

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 8, 2024

Richard Gonzalez (rgonzalez@gillranchstorage.com)
Chief Operating Officer
Gill Ranch Storage, LLC
16300 Avenue 3
Madera, CA 93637

GI-2023-10-GRS-38-05

Subject: Closure Letter for the General Order (G.O.) 112-F Inspection of Gill Ranch Storage's Damage Prevention & Public Awareness Programs

Dear Mr. Gonzalez:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) reviewed Gil Ranch Storage's (GRS) response letter dated January 18, 2024, regarding the findings identified during the General Order 112-F inspection of GRS's Damage Prevention (DP) and Public Awareness (PA) Programs between October 16 and October 20, 2023.

A summary of the inspection findings documented by SED, GRS's response to the findings, and SED's evaluation of the identified Areas of Concern are attached.

This letter serves as the official closure of the 2023 GO 112-F inspection of GRS's DP and PA programs updates and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this inspection. If you have any questions, please contact Victor Muller at (415) 940-4352 or by email at victor.muller@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Findings

CC: Timothy Morgan, RegSafe (timothy.morgan@regsafe.com)
Victor Muller, SED/GSRB
Jason McMillan, SED/GSRB
Terence Eng, SED/GSRB
Claudia Almengor, SED/GSRB

Post-Inspection Written Findings

Dates of Inspection: 10/16/2023 – 10/20/2023

Operator: GILL RANCH STORAGE LLC

Operator ID: 32549 (primary)

Inspection Systems: Gill Ranch Storage Pipeline Facilities

Assets (Unit IDs) with results in this report: Gill Ranch Storage (86919)

System Type: GT

Inspection Name: 2023 GRS PAP & DP

Lead Inspector: Victor Muller

Operator Representative: Timothy Morgan

A. Public Awareness and Damage Prevention : Public Awareness (PD.PA)

Question Title, ID Evaluation Plan, PD.PA.EVALPLAN.P

Question 1. Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?

References 192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)

Result Concern

Assets Covered Gill Ranch Storage (86919 (38))

Issue Summary Section 8.4.4 of API RP 1162 states in part:

"As a baseline, the operator should track the number of incidents and consequences caused by third-party excavators. This should include reported near misses..."

Section 8.4 of API RP 1162 establishes requirements for measuring public awareness program effectiveness. SED reviewed GRS documentation showing the tracking of near miss data. This data was not included in GRS's 2022 4-year effectiveness evaluation.

SED recommends that near miss data be included in future public awareness program effectiveness evaluation documents to maintain compliance with section 8.4.4 of API RP 1162.

GRS's Response As mentioned in the "Issue Summary" above, GRS does already track near misses as part of its Safety Management System metrics. GRS will incorporate this data into its next 4-year effectiveness evaluation to be completed no later than 2026.

SED's Conclusion SED has reviewed the response from GRS and determined that the corrective actions articulated by GRS sufficiently address SED's concern. SED may review GRS's revisions for compliance with GO 112F during future inspections.

Question Title, ID Program Changes and Improvements, PD.PA.PROGRAMIMPROVE.R

Question 2. Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?

References 192.616(c) (API RP 1162 Section 8.3)

Result Concern

Assets Covered Gill Ranch Storage (86919 (38))

Issue Summary During this inspection, GRS provided evidence that they had made multiple efforts to reach out to public officials but had not received meaningful feedback from any members of the stakeholder group. GRS's 2022 4-year effectiveness survey stated that GRS had received no survey responses from public officials. GRS stated in the Finding/Corrective Actions section of the report that, "In the future, Gill Ranch will increase outreach with Public Officials, and emphasize the importance of the information for continual improvement of safety and public knowledge at Gill Ranch."

SED recommends that GRS write and implement specific and actionable plans to increase outreach to public officials to ensure that this finding from their 4-year effectiveness survey is addressed by program improvements.

GRS's Response GRS has historically mailed its 4-year effectiveness surveys to all stakeholder groups (including Public Officials). In an effort to receive better feedback from the Public Officials group, GRS will attempt to collect survey responses in future effectiveness evaluations via an initial mailing (as it has done historically), and for those Public Officials for which a response is not received, attempt to visit them in person to secure a response. This attempt to meet with Public Officials in person shall be documented on the GRS Public Awareness Meeting form. GRS will update its 2022 4-year effectiveness report in the "Finding/Corrective Actions" section to reflect this commitment.

SED's Conclusion SED has reviewed the response from GRS and determined that the corrective actions articulated by GRS sufficiently address SED's concern. SED may review GRS's implementation of these corrective actions for compliance with GO 112F during future inspections.