

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 22, 2023

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

GI-2023-10-GRS-38-05

**Subject: 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 conducted a G.O. 112-F review and inspection of Gil Ranch Storage's (GRS) Damage Prevention (DP) and Public Awareness (PAP) Programs between October 16 and October 20, 2023. SED staff reviewed GRS's written DP and PAP procedures and records pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (CFR), Parts 191, and 192 and used the Pipeline and Hazardous Material Safety Administration's (PHMSA) Inspection Assistant (IA) as a reference guide to conduct the inspection.

SED's findings are noted in the Post-Inspection Written Preliminary Findings (Summary) which is enclosed with this letter. SED identified two (2) concerns during this inspection. These findings reflect only those procedures and records that SED inspected during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by GRS to address the concerns noted in the Summary.

If you have any questions, please contact Victor Muller at (415) 940-4352 or by email at [victor.muller@cpuc.ca.gov](mailto:victor.muller@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng".

Terence Eng, P.E.  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

CC: Timothy Morgan, RegSafe ([timothy.morgan@regsafe.com](mailto:timothy.morgan@regsafe.com))  
Victor Muller, SED/GSRB  
Jason McMillan, 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.

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.