



Lodi Gas Storage, L.L.C.
A Rockpoint Gas Storage Company
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July 12, 2023

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue, 2nd Floor
San Francisco, CA 94102-3298
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VIA ELECTRONIC MAIL

RE: General Order 112-F Inspection of Lodi Gas Storage

Dear Mr. Eng:

Lodi Gas Storage, L.L.C. (LGS) submits this written response to the Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission). On behalf of the SED, Randy Fienberg and Kai Cheung conducted a General Order 112-F inspection of LGS from April 24, 2023, through April 28, 2023. The inspection findings identified by SED were provided to LGS on June 13, 2023. LGS addresses the inspection findings as noted by SED in the “Post-Inspection Written Preliminary Findings” in the following enclosed documents:

- **Attachment #1** – LGS Responses to “Post-Inspection Written Preliminary Findings”
- **Attachment #2** – Excerpt from LGS Emergency Response Plan highlighting revisions to address cyber attacks

If you have any questions, or require more information, please contact me at greg.clark@rockpointgs.com or at (209) 368-9277.

Sincerely,

p.p. 

Gregory N. Clark
Senior Compliance Manager

Enclosures

cc: File #S3.03
C. Almengor (claudia.almengor@cpuc.ca.gov)
R. Fienberg (randy.fienberg@cpuc.ca.gov)
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A. Anderson, M. Fournier, H. Gold, K. Peterson (via e-mail)



Post-Inspection Written Preliminary Findings

Concerns

1. Emergency Preparedness and Response: Emergency Response (EP.ERG)

Question 8. Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, operational failure (including cyber-attacks), or a natural disaster?

References 192.615(a) (192.615(a)(3), 192.615(a)(11), 192.615(b)(1))

LGS's Emergency Response Plan does not include cyber-attacks as a type of emergency.

LGS Response:

LGS has updated its Emergency Response Plan (ERP) to include cyber-attacks as a type of emergency. Please see Attachment #2.

2. Time-Dependent Threats: Atmospheric Corrosion (TD.ATM)

Question 5. Is pipe that is exposed to atmospheric corrosion protected?

References 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), 192,481(d))

During field observation, SED noted surface corrosion and disbonded coating on the Wagenet inlet piping at the Birds Landing metering site.

LGS Response:

Lodi Gas Storage inspects and evaluates its pipelines for atmospheric corrosion in accordance with 49 CFR 192.481. As a point of clarification, the surface corrosion identified by SED was located on the Wagenet inlet piping at the Kirby Hills compressor station and it shall be properly mitigated.



7.11 Cyber Attacks

Identify

- **Identify** that you have been subjected to a possible cyber attack

Sound the Alarm

- **Call** Rockpoint IT department immediately and report your observations/findings

Secure the System

- **Follow** the directions provided by the IT department

Assess the Hazard

IT Department:

- **Assess** the issue identified
- **Determine** the criticality and escalate as required
- **Follow** the Incident Response Workflow (below)

