

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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July 27, 2023

Mathieu Fournier
Vice President, Operations
Rockpoint Gas Storage
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GI-2023-04-WGS-36-01ABC

SUBJECT: SED's Closure Letter for General Order 112-F Gas Inspection of Wild Goose Storage

Dear Mr. Fournier:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) reviewed Wild Goose Storage (WGS) response letter dated June 23, 2023 for the findings identified during the General Order 112-F inspection of WGS plans, records, and facilities from April 10 to 14, 2023.

A summary of the inspection findings documented by the SED, WGS' response to our findings, and SED's evaluation of PG&E's response taken for each identified Violation and Area of Concern and Recommendation is attached.

This letter serves as the official closure for this portion of the 2023 GO 112-F Inspection of WGS 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 Anthony Phu at (916) 713-4136 or by email at anthony.phu@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 Preliminary Findings

cc: Greg Clark, Rockpoint Gas Storage (greg.clark@rockpointgs.com)
Andy Anderson, Rockpoint Gas Storage (andy.anderson@rockpointgs.com)
Grant Bozarth, Rockpoint Gas Storage (grant.bozarth@rockpointgs.com)
Jason McMillan, CPUC Gas Safety and Reliability Branch
Claudia Almengor, CPUC Gas Safety and Reliability Branch
Anthony Phu, CPUC Gas Safety and Reliability Branch
Terence Eng, CPUC Gas Safety and Reliability Branch

Post-Inspection Written Preliminary Findings

Dates of Inspection: 04/10/2023 – 04/14/2023

Operator: WILD GOOSE STORAGE LLC

Operator ID: 31287 (primary)

Inspection Systems: Wild Goose Storage Compressor Station & Pipeline ROW

Assets (Unit IDs) with results in this report: Wild Goose Storage (88673)

System Type: GT

Inspection Name: 2023 Wild Goose Storage (Comprehensive Standard Transmission)

Lead Inspector: Anthony Phu

Operator Representative: Greg Clark

Unsatisfactory Results

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

Question Text 21. Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?

References 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)

Assets Covered Wild Goose Storage (88673 (36))

Issue Summary 49 CFR §192.615(c) states that "Each operator must establish and maintain liaison with the appropriate public safety answering point (i.e., 9-1-1 emergency call center) where direct access to a 9-1-1 emergency call center is available from the location of the pipeline, as well as fire, police, and other public officials."

WGS did not establish a documented ongoing relationship with emergency and public officials during the 2020-2022 period. Therefore, WGS is in violation of 49 CFR §192.615(c).

WGS' Response WGS is committed to maintaining liaison with the local public emergency responders including fire, police, and other public officials. Prior to the pandemic, Wild Goose Storage ensured that direct, in-person liaison was performed. During the pandemic, (May 2020 – December 2022) it was decided, to ensure safety and health of our operations staff and that of the emergency responders, to replace the in-person contact with a mailout that requested the same information be provided and then returned to WGS. The number of returned responses was deemed insufficient during this audit. As the pandemic is now over, WGS has resumed in-person liaison activities.

SED Conclusion SED has reviewed WGS' response and accepts the corrective actions that it has articulated and implemented. SED has opted not to impose a fine or penalty at this time.