

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 28, 2025

Mr. Darrell Hall ([dhall@calichestorage.com](mailto:dhall@calichestorage.com))  
Vice President of Operations Central Valley Gas Storage  
919 Milam St  
Houston, TX 77002

GI-2024-12-CVS-39-08

SUBJECT: General Order 112-F Transmission Integrity Management Program (TIMP) Inspection of  
Central Valley Gas Storage (CVGS)

Dear Mr. Hall:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Paul Penney and Kai Cheung conducted a General Order 112-F inspection of the CVGS Transmission Integrity Management Program (TIMP) on December 16, 2024. The inspection included a review of records related to High Consequence Area (HCA) identification, as well as records related to the new Part 192 requirements for Moderate Consequence Areas (MCAs).

As identified during the records review, CVGS does an HCA analysis on a yearly basis using Method 1. As of the date of this audit, CVGS has not identified any areas along its transmission line that meet the definition of an HCA but has identified one MCA. Therefore, CVGS is subject to CFR 49, Part 192 requirements related to MCAs going forward.

No response to the audit letter is necessary. Thank you for your cooperation with this safety inspection.

If you have any questions, please contact Paul Penney at (415) 703-1817 or by email at [Paul.Penney@cpuc.ca.gov](mailto:Paul.Penney@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Terence Eng".

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

cc: Dennis Lee, SED  
Kai Cheung, SED  
Claudia Almengor, SED  
Amy Johnson, Director of Regulatory, CVGS ([ajohnson@calichestorage.com](mailto:ajohnson@calichestorage.com))  
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