

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 21, 2024

GI-2024-09-LGS-37-03-04-10

Mathieu Fournier, VP of Eng/Ops ([Mathieu.Fournier@rockpointgs.com](mailto:Mathieu.Fournier@rockpointgs.com))  
Lodi Gas Storage, LLC  
400, 607 – 8th Avenue S.W.  
Calgary, Alberta, Canada T2P 0A7

SUBJECT: SED's Inspection/Closure letter for the General Order (GO) 112-F Inspection of Lodi Gas Storage

Dear Mr. Fournier:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112-F inspection of Lodi Gas Storage (LGS) during September 09 – September 20, 2024. The inspection included a review of the Operations and Maintenance Plan (O&M), Emergency Plan (EP), Public Awareness Program (PAP), and Control Room Management Program (CRM).

SED has identified two violations and six concerns which are described in the "Post-Inspection Written Findings". SED's findings are noted in the Attached Post-Inspection Written Findings (Summary) section of this letter. The Summary reflects only those plans, procedures and records that SED inspected during the inspection. LGS provided response on October 18, 2024. This letter serves as the official closure of the 2024 (GO) 112-F Inspection of Lodi Gas Storage.

If you have any questions, please contact James Zhang at (415) 603-1310 or by email at [James.Zhang@cpuc.ca.gov](mailto:James.Zhang@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:

Andy Anderson, WGS ([andy.anderson@rockpointgs.com](mailto:andy.anderson@rockpointgs.com))  
Greg Clark, WGS ([greg.clark@rockpointgs.com](mailto:greg.clark@rockpointgs.com))  
Claudia Almengor, SED  
Terence Eng, SED

# Post-Inspection Written Findings

**Dates of Inspection:** 9/9/2024 – 9/20/2024

**Operator:** LODI GAS STORAGE, LLC

**Operator ID:** 31697 (primary)

**Inspection Systems:** GT

**Assets (Unit IDs) with results in this report:** Lodi Gas Storage (86920)

**System Type:** GT

**Inspection Name:** 2024 LGS CRM

**Lead Inspector:** James Zhang

**Operator Representative:** Greg Clark

## Unsatisfactory Results

### CRM, SCADA, and Leak Detection: CRM Roles and Responsibilities (CR.CRMRR)

Question Title, Shift Change Process - Documentation,  
ID CR.CRMRR.HANDOVERDOC.R

Question 14. Are there records that document the hand-over of responsibility, document the time the actual hand-over of responsibility occurs, and the key information and topics that were communicated during the hand-over?

References 192.631(b)(4) (192.631(c)(5))

Assets Covered Lodi Gas Storage (86920 (37))

Issue Summary SED reviewed LGS shift change forms, and we found that the forms were missing numerous records or found to be problematic, such as inconsistent on-duty, off duty date, time, and personnel on LGS shift change form(s) in the month of April 2022. Therefore, LGS is in violation of 192.631(b). LGS shall ensure that all necessary documentation (forms, permits, checklists, reports, and other records) for compliance with the CRM rule is accurately documented, completed and retained, for at least a period of five years.

## **LGS 10/18/2024 Response:**

Lodi Gas Storage endeavors to document controller shift-changes in compliance with the CRM rule and shall improve in this area.

### **SED's Conclusion:**

SED has reviewed LGS 10/18/2024 response and accepted the corrective actions. SED may also verify if adequate records or documentation is achieved by LGS when conducting field inspection in the future.

## **CRM, SCADA, and Leak Detection: Change Management (CR.CRMCMGT)**

Question Title, Coordination of Field Changes, CR.CRMCMGT.FIELDCHANGES.R  
ID

Question 6. Do records indicate field personnel and SCADA support personnel contacted the control room when making field changes (e.g., operating a valve, O&M inspections/calibrations, RTU/PLC modifications) that affect control room operations?

References 192.631(f)(2)

Assets Covered Lodi Gas Storage (86920 (37))

Issue Summary SED reviewed LGS CRM records, and we found that several records, such as LGS emergency valve inspection report, work authorization permit, etc... for 2022 – 2023 did not demonstrate that efforts were coordinated with the control room when making field changes. Therefore, LGS is in violation of 192.631(f). LGS shall ensure that all necessary documentation (forms, permits, checklists, reports, and other records) for compliance with the CRM rule is accurately documented, completed and retained, for at least a period of five years.

## **LGS 10/18/2024 Response:**

Lodi Gas Storage endeavors to document changes that could affect control room operations are coordinated with control room personnel in compliance with the CRM rule and shall improve in this area.

### **SED's Conclusion:**

SED has reviewed LGS 10/18/2024 response and accepted the corrective actions. SED may also verify if adequate records or documentation is achieved by LGS when conducting field inspection in the future.

# Concerns

## CRM, SCADA, and Leak Detection: Change Management (CR.CRMCMGT)

Question Title, Controller Participation in System Changes,  
ID CR.CRMCMGT.CONTROLLERPARTICIPATE.P

Question 2. Are control room representative(s) required to participate in meetings where changes that could directly or indirectly affect the hydraulic performance or configuration of the pipeline (including routine maintenance and repairs) are being considered, designed and implemented?

References 192.631(f)(1) (192.631(f)(3))

Assets Covered Lodi Gas Storage (86920 (37))

Issue Summary CFR 49 Part 192.631(f)(3) states: "Seek control room or control room management participation in planning prior to implementation of significant pipeline hydraulic or configuration changes."

SED reviewed the below Lodi Gas Storage's documents and noted that the O&M Manual, Procedure 17, Section 11.4(3) only states in part "MOC (Management of Change) Coordinator will coordinate the entire review process, including arranging review meetings with subject matter experts (if applicable)." However, the Control Room Management Plan (CRMP) and Appendix E do not contain adequate processes that control room representative(s) required to participate in meetings where changes that could directly or indirectly affect the hydraulic performance or configuration of the pipeline (including routine maintenance and repairs) are being considered, designed and implemented.

### Documents:

1. Control Room Management Plan (CRMP), Section 6-Change Management (page#16-17)
2. CRMP, Appendix E SCADA and Communication Procedures (page#57-77)
3. Operations and Maintenance Manual, Procedure 17.11-Management of Change (page#461-468)

### **LGS 10/18/2024 Response:**

LGS has updated Section 6 of the LGS Control Room Management Plan to address control room participation during change management. Please see Attachment #2.

### **SED's Conclusion:**

SED has reviewed LGS 10/18/2024 response and accepted the corrective actions.

Question Title, Emergency Contact with Control Room,  
ID CR.CRMCMGT.EMERGENCYCONTACT.P

Question 4. Is there a process requiring field personnel and SCADA support personnel to contact the control room when emergency conditions exist?

References 192.631(f)(2)

Assets Covered Lodi Gas Storage (86920 (37))

Issue Summary CFR 49, Part 192.631(f)(2) require its field personnel to contact the control room when emergency conditions exist and when making field changes that affect control room operations.

SED reviewed the below LGS's documents and noted that LGS's Emergency Response Plan, Emergency Notifications Flow Chart (Page#74) indicates that the incident is reported to control room operator or on-call operator by 1. System Alarm, 2. Rockpoint personnel (including 1. Emergency Response Team (ERT), Incident Command Team (ICT), and Crisis Management Team (CMT) (page#88-#91)), 3. Third Party. LGS's ERT should include process requires field personnel and SCADA support personnel to contact the control room when emergency conditions exist.

Documents:

- Control Room Management Plan (CRMP) and Appendix C (Refer to LGS Manuals)
- Operation and Maintenance (O&M) Manual
- Emergency Response Plan ---Section 7 (page#140-#147)

**LGS 10/18/2024 Response:**

LGS has updated Emergency Notifications Flow Chart located within its Emergency Response Plan to explicitly require that field personnel and SCADA support personnel contact the control room when emergency conditions exist in accordance with §192.631(f)(2). Please see Attachment #3.

**SED's Conclusion:**

SED has reviewed LGS 10/18/2024 response and accepted the corrective actions.

**CRM, SCADA, and Leak Detection: Training (CR.CRMTRAIN)**

Question Title, Control Room Team Training - Personnel,  
ID CR.CRMTRAIN.TEAMTRAINPERSONNEL.P

Question 14. Do processes establish who, regardless of location, operationally collaborates with control room personnel?

References 192.631(h)(6)

Assets Covered Lodi Gas Storage (86920 (37))

Issue Summary CRF 49 Part 192.631(h)(6) states: "Control room team training and exercises that include both controllers and other individuals, defined by the operator, who would reasonably be expected to operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations. Operators must comply with the team training requirements under this paragraph by no later than January 23, 2018."

SED reviewed Lodi Gas Storage's Control Room Management Plan (CRMP), Appendix D -Qualified Controllers Training (page#43-56) and noted that Lodi Gas Storage updated the Control Room Team Training requirements under Section 2.8 (page#61-52); however, all written language is direct from the PHMSA Control Room Management Frequently Asked Questions (FAQs) H.05, H.06, H.07, H.08, H.09, and J.06.

**LGS 10/18/2024 Response:**

LGS has updated Section 2.8 (Control Room Team Training) in Appendix D of the LGS Control Room Management Plan. Please see Attachment #4.

**SED's Conclusion:**

SED has reviewed LGS 10/18/2024 response and accepted the corrective actions.

Question Title, Control Room Team Training - Frequency,  
ID CR.CRMTRAIN.TEAMTRAINFREQ.P

Question 15. Do processes define the frequency of new and recurring team training?

References 192.631(h)(6)

Assets Covered Lodi Gas Storage (86920 (37))

Issue Summary CRF 49 Part 192.631(h)(6) states: "Control room team training and exercises that include both controllers and other individuals, defined by the operator, who would reasonably be expected to operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations. Operators must comply with the team training requirements under this paragraph by no later than January 23, 2018."

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Question Title, Control Room Team Training - Completeness,  
ID CR.CRMTRAIN.TEAMTRAINCOMPLETE.P

Question 16. Do processes address all operational modes and operational collaboration/control?

References 192.631(h)(6) (ADB-2014-02)

Assets Covered Lodi Gas Storage (86920 (37))

Issue Summary CRF 49 Part 192.631(h)(6) states: "Control room team training and exercises that include both controllers and other individuals, defined by the operator, who would reasonably be expected to operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations. Operators must comply with the team training requirements under this paragraph by no later than January 23, 2018."

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**SED's Conclusion:**

SED has reviewed LGS 10/18/2024 response and accepted the corrective actions.

Question Title, Control Room Team Training - Operational Experience,  
ID CR.CRMTRAIN.TEAMTRAINEXPERIENCE.P

Question 17. Do processes include incorporation of lessons learned from actual historical events and other oil-gas industry events?

References 192.631(h)(6)

Assets Covered Lodi Gas Storage (86920 (37))

Issue Summary CRF 49 Part 192.631(h)(6) states: "Control room team training and exercises that include both controllers and other individuals, defined by the operator, who would reasonably be expected to

operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations. Operators must comply with the team training requirements under this paragraph by no later than January 23, 2018."

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# Post-Inspection Written Findings

**Dates of Inspection:** 09/09/2024 – 09/20/2024

**Operator:** LODI GAS STORAGE, LLC

**Operator ID:** 31697 (primary)

**Inspection Systems:** GT

**Assets (Unit IDs) with results in this report:**

**System Type:** GT

**Inspection Name:** 2024 LGS OM&E Plan

**Lead Inspector:** James Zhang

**Operator Representative:** Greg Clark

## Unsatisfactory Results

*No Preliminary Findings.*

## Concerns

*No Preliminary Concerns.*

# Post-Inspection Written Findings

**Dates of Inspection:** 09/09/2024 – 09/20/2024

**Operator:** LODI GAS STORAGE, LLC

**Operator ID:** 31697 (primary)

**Inspection Systems:** GT

**Assets (Unit IDs) with results in this report:**

**System Type:** GT

**Inspection Name:** 2024 LGS Public Awareness Program

**Lead Inspector:** James Zhang

**Operator Representative:** Greg Clark

## Unsatisfactory Results

*No Preliminary Findings.*

## Concerns

*No Preliminary Concerns.*