

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 22, 2024

Mark Williams, President
West Coast Gas
9203 Beatty Drive
Sacramento, CA 95826

GI-2024-06-WCG-07-09

Subject: General Order (G.O.) 112-F Inspection of West Coast Gas' Operator Qualification and Distribution Integrity Management Programs

Dear Mr. Williams:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F review and inspection of West Coast Gas's (WCG) updates to their Operator Qualification (OQ) Procedures and Distribution Integrity Management Programs (DIMP) Programs between June 17 to June 21, 2024. SED staff reviewed WCG's written OQ and DIMP procedures pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (CFR), Parts 191 and 192 and used Pipeline and Hazardous Material Safety Administration's (PHMSA) Inspection Assistant (IA) as a reference guide to conduct the inspection.

SED's staff noted two (2) areas of concern which are described in the attached "Post-Inspection Written Findings".

WCG responded to SED's concerns on August 29, 2024; SED reviewed and accepts the responses. This letter serves as the official closure of the 2024 GO 112-F inspection of WCG's OQ Procedures and DIMP Programs.

If you have any questions, please contact Matthew Shaffer (916) 969-9334 or by email at matthew.shaffer@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee". The signature is fluid and cursive, with the first name "Dennis" and last name "Lee" clearly distinguishable.

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Findings

CC: see next page

Ray Czahar
Chief Financial Officer
West Coast Gas

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Jason R. McMillan
Senior Utilities Engineer (Supervisor)
Safety and Enforcement Division

Matthew Shaffer
Utilities Engineer
Safety and Enforcement Division

Post-Inspection Written Findings

Dates of Inspection: 06/17/2024 – 06/21/2024

Operator: WEST COAST GAS CO INC

Operator ID: 31267 (primary)

Inspection Systems: Mather Residential, Mather Commercial, Castle, and Herlong

Assets (Unit IDs) with results in this report: West Coast Gas (88675)

System Type: GD

Inspection Name: 2024 WCG OQ & DIMP

Lead Inspector: Matthew Shaffer

Operator Representative: Mark Williams

Concerns

Training and Qualification : Operator Qualification (TQ.OQ)

Question Title, ID Qualification Records for Personnel Performing Covered Tasks, TQ.OQ.RECORDS.R

Question 11. Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?

References 192.807

Assets Covered West Coast Gas (88675 (34))

Issue Summary SED reviewed WCG's qualification records from 1/1/2021 to 12/30/2023 including Form OQ 1.3 Joining of Plastic Pipe Butt Heat Fusion Manual, Form OQ 1.4 Joining of Plastic Pipe Electrofusion, and Form OQ 1.5 Joining of Plastic Pipe Socket Heat Fusion for the five employees that were employed between the beginning of 2021 to the end of 2023. Form OQ 1.5 was incomplete for one employee. The form was signed and dated, but the box indicating pass or fail was left blank. This omission is a single instance, and based on interviews with WCG, SED believes it is a documentation error, rather than a violation of the Title 49, Code of Federal Regulations (CFR), Part 192.

SED requests that WCG update their training records to accurately reflect all completed OQ training by WCG employees.

WCG Response: WCG has updated their records to accurately reflect all completed OQ training by WCG Employees.

SED Conclusion: SED has reviewed the response from WCG and determined that the response sufficiently addresses SED's concern.

Gas Distribution Integrity Management : Periodic Evaluation (GDIM.PE)

Question Title, ID Periodic Evaluation - Requirements, GDIM.CA.PERIODICEVAL.P

Question 1. Do the procedures for periodic evaluation include all of the requirements of §192.1007(f)?

References 192.1007(f)

Assets Covered West Coast Gas (88675 (34))

Issue Summary SED reviewed WCG's DIMP plans for Castle, Mather Residential, and Mather Commercial and found that Chapter 8 PERIODIC EVALUATION AND IMPROVEMENT does not indicate the re-evaluation period for the DIMP.

SED reviewed WCG's DIMP plans for Herlong and found that Chapter 8 PERIODIC EVALUATION AND IMPROVEMENT indicates that the re-evaluation period is five years, which meets the requirements of CFR 192.1007(f).

WCG has been performing re-evaluations of all systems at the adequate intervals listed in the Herlong Plan.

SED requests that WCG update their DIMP plans for Castle, Mather Residential, Mather Commercial to match the language in the Herlong Plan, and reflect the correct periodic evaluation of the DIMP plans.

WCG Response: During WCG's re-evaluation of the DIMP programs, we will input language that matches the Herlong Plan.

SED Conclusion: SED has reviewed the response from WCG and determined that the response sufficiently addresses SED's concern.