

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 31, 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".

Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by West Coast Gas to address the concerns noted in the "Post-Inspection Written Findings".

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

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng".

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

Enclosure: Post-Inspection Written Findings

CC: see next page

Ray Czahar  
Chief Financial Officer  
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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.

# 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.