

West Coast Gas Company Inc.

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29 August 2024

Terence Eng, PE
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Response to SED Audit Letter dated July 31, 2024

Dear Mr. Eng,

Following is West Coast Gas Company Inc.'s response to the SED findings for the GO 112-F Inspection which occurred between June 17 through June 24, 2024.

If you have any questions, please feel free to contact me at 916-364-4100, Monday through Friday, 7 am to 3:30 pm.

Sincerely,

Mark Williams

Mark Williams
President

cc:

Jason McMillan, SED
Matthew Shaffer, SED
Dennis Lee, SED
Claudia Almengor, SED
Cynthia Morris, WCG
Chad LeBlanc, WCG

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.

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.