



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

March 27, 2025

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

Re: Docket No. PHMSA-2025-0009

Dear Mr. Eng:

On January 31, 2025, pursuant to 49 United States Code (U.S.C.) 60118(d), the Pipeline and Hazardous Materials Safety Administration (PHMSA) received a notification from the California Public Utilities Commission (CPUC) granting a waiver of 49 Code of Federal Regulations (CFR) 192.53, 192.55, 192.105, 192.107, 192.109, 192.111, 192.113, 192.144, 192.149, 192.150, 192.463, and 192.619 to Rockpoint LODI Gas Storage, LLC (Rockpoint). This waiver allows Rockpoint to use FlexSteel pipes to remediate a 12.75-inch steel diameter inter-facility natural gas pipeline, that was originally constructed in 2002. This waiver applies to Rockpoint's Site 6 Pipeline in the LODI Gas Storage facility totaling 4,118 feet (0.78 miles) in San Joaquin County, California.

CPUC issued the State waiver to Rockpoint in accordance with General Order (GO) No. 112-F, "State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems."¹ GO 112-F supplements the Federal pipeline safety regulations, specifically 49 CFR Parts 191, 192, 193, and 199. Section 101.3 of GO 112-F allows for a utility, in special circumstances, to submit an application to waive compliance with specific rules in accordance with section 3(e) of the Natural Gas Pipeline Safety Act of 1968.

Rockpoint submitted its request to CPUC for waiver in accordance with 49 U.S.C. 60118(d). Rockpoint's request included the following information addressing the PHMSA criteria:

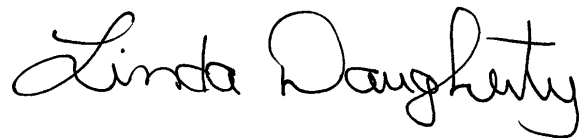
¹ <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M556/K069/556069635.pdf>

- This State waiver is not applicable for Class 3 and 4 locations, high consequence areas (HCA), or for Class 2 to 3 location increases per 49 CFR 192.611. Therefore, if the class location changes, Rockpoint will be required to remove and replace this portion of FlexSteel pipe with 49 CFR Part 192 compliant steel pipe or FlexSteel applicable to the new class location.
- The FlexSteel segment will not tap, branch, or split pipe without the use of the appropriate FlexSteel manufactured fittings for the appropriate application.
- Rockpoint provided data confirming that the pipe design and construction met acceptable PHMSA criteria.
- The proposed State waiver area crosses flat to low-lying slope and is not subject to any known geohazards.
- The segment has no history of pressure test failures and was last tested on October 31, 2001.
- The segment has 36-inch depth of cover and will use the retired 12.75-inch pipeline as a casing to protect the FlexSteel from excavation damage.
- There are no reportable incidents for the proposed State waiver segment.
- Rockpoint must treat this State waiver segment as if the entire segment is a covered segment in an HCA and must develop and follow an integrity management program in accordance with the requirements of 49 CFR Part 192, Subpart O.

Pursuant to 49 U.S.C. 60118(d), PHMSA does not object to the issuance of this waiver by the CPUC for Rockpoint's pipeline as submitted. PHMSA requests that a copy of CPUC's final waiver to Rockpoint be forwarded to PHMSA within 30 days of issuance.

If you wish to discuss this or any other pipeline safety matter, my staff would be pleased to assist you. Please contact Max Kieba, Director of Engineering and Research Division at 202-493-0595, for technical matters.

Sincerely,

A handwritten signature in black ink that reads "Linda Daugherty". The signature is written in a cursive, flowing style.

Linda Daugherty,
Acting Associate Administrator for Pipeline Safety