



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

1200 New Jersey Avenue SE
Washington DC 20590

2009 Natural Gas State Program Evaluation

for

CALIFORNIA PUBLIC UTILITIES COMMISSION

Document Legend

PART:

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2009 Natural Gas State Program Evaluation -- CY 2009
Natural Gas

State Agency: California

Agency Status:

Date of Visit: 10/25/2010 - 10/29/2010

Agency Representative: Raffy Stepanian, Program Manager

Sunil Shori, Utilities Engineer

Michael Robertson, Gas Section (Los Angeles)

Matthewson Epuna, Utilities Engineer

PHMSA Representative: Glynn Blanton, DOT/PHMSA State Programs

Tom Finch, DOT/PHMSA Western Region CATS Manager

Commission Chairman to whom follow up letter is to be sent:

Name/Title: Michael R. Peevey, President

Agency: California Public Utilities Commission

Address: 505 Van Ness Avenue

City/State/Zip: San Francisco, California 94102-3298

Rating:

60105(a): Yes **60106(a):** No **Interstate Agent:** No

INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2009 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART F):

The field inspection form used will allow different areas of emphasis to be considered for each question. Question 13 is provided for scoring field observation areas. In completing PART F, the PHMSA representative should include a written summary which thoroughly documents the inspection.

Scoring Summary

PARTS		Possible Points	Points Scored
A	General Program Qualifications	26	26
B	Inspections and Compliance - Procedures/Records/Performance	25	25
C	Interstate Agent States	0	0
D	Incident Investigations	7	7
E	Damage Prevention Initiatives	9	9
F	Field Inspection	12	12
G	PHMSA Initiatives - Strategic Plan	10	9.5
H	Miscellaneous	3	3
I	Program Initiatives	9	9
TOTALS		101	100.5
State Rating			99.5

PART A - General Program Qualifications

Points(MAX) Score

- | | | | |
|----------|--|-------------------------------------|---|
| 1 | Did the state submit complete and accurate information on the attachments to its most current 60105(a) Certification/60106 (a) Agreement? (NOTE: PHMSA Representative to verify certification/agreement attachments by reviewing appropriate state documentation. Score a deficiency in any one area as "needs improvement". Attachment numbers appear in parenthesis) Previous Question A.1, Items a-h worth 1 point each
Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2 | 8 | 8 |
| <hr/> | | | |
| a. | State Jurisdiction and agent status over gas facilities (1) | <input checked="" type="checkbox"/> | |
| b. | Total state inspection activity (2) | <input checked="" type="checkbox"/> | |
| c. | Gas facilities subject to state safety jurisdiction (3) | <input checked="" type="checkbox"/> | |
| d. | Gas pipeline incidents (4) | <input checked="" type="checkbox"/> | |
| e. | State compliance actions (5) | <input checked="" type="checkbox"/> | |
| f. | State record maintenance and reporting (6) | <input checked="" type="checkbox"/> | |
| g. | State employees directly involved in the gas pipeline safety program (7) | <input checked="" type="checkbox"/> | |
| h. | State compliance with Federal requirements (8) | <input checked="" type="checkbox"/> | |

SLR Notes:

Yes. Information reviewed in the 2010 Natural Gas Certification attachment 1 was found to lack information on current status or action being taken to obtain authority in note section. Attachments 2 & 3 are correct with inspection units and activities. All incident reports were submitted, information on cause codes were entered correctly. Compliance information on attachment 5 was correct with number of violations found and corrected. Training requirements for pipeline safety staff members meets the requirements of the guidelines. All federal regulations have been adopted in accordance with the three year requirement. We noted the maximum penalties amount is not the same as DOT. CA PUC may fine up to any level if it deems appropriate starting at \$500/day up to \$20,000/day per violation. Each day the violation continues is considerate a separate and distinct violation. Master-meter and propane operators can be fined \$1,000/day for each day a violation continues, but not to exceed \$200,000 for a single violation or related series of violations.

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| 2 | Did the state have an adequate mechanism to receive operator reporting of incidents to ensure state compliance with 60105(a) Certification/60106(a) Agreement requirements (fatality, injury requiring hospitalization, property damage exceeding \$50,000 - Mechanism should include receiving "after hours" reports)? (Chapter 6) Previous Question A.2
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes. This is address in the Utilities Safety and Reliability Branch (USRB) Incident investigation Procedure Manual on pages 5 & 6.

- | | | | |
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| 3 | Has the state held a pipeline safety TQ seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but T&Q could not provide, indicate date of state request for seminar. Seminars must be held at least once every 3 calendar years.) (Chapter 8.5) Previous Question A.4
Yes = 2 No = 0 | 2 | 2 |
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SLR Notes:

Last seminar held on April 1-4, 2008 in Stockton and San Bernardino, CA. CA PUC plans to hold a TQ seminar in 2011 and have requested this seminar from TQ staff members.

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| 4 | Were pipeline safety program files well-organized and accessible?(NOTE: This also includes electronic files) (Chapter 5) Previous Question A.5
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes, a review of file folders and electronic data indicated the information on operators and other relative action by the PUC was up to date and well organized. All hard copy files of each inspection performed by staff members are maintained in the Northern (San Francisco) and Southern (Los Angeles) offices in a security location.

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| 5 | Did state records and discussions with the state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? (Chapter 4.1, Chapter 8.1) Previous Question A.6
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Yes, Raffy Stepanian, Program Manager and Sunil Shori, Utilities Engineer have many years of experience in pipeline safety and understand the requirements in submitting grant application and year-end payment agreements to PHMSA. This represents over twenty years of experience in pipeline safety.

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| 6 | Did the state respond in writing within 60 days to the requested items in the Chairman's letter following the Region's last program evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8
Yes = 1 No = 0 | 1 | 1 |
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SLR Notes:

No response was required in letter to Chairman dated February 11, 2010.

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| 7 | What actions, if necessary, did the State initiate as a result of issues raised in the Chairperson's letter from the previous year? Did actions correct or address deficiencies from previous year's evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8/A.9
Yes = 1 No = 0 | 1 | 1 |
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SLR Notes:

No response was required in letter to Chairman dated February 11, 2010.

Personnel and Qualifications

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|----------|--|---|---|
| 8 | Has each inspector fulfilled the 3 year TQ training requirement? If No, has the state been granted a waiver regarding TQ courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all TQ courses, but are in a program which will achieve the completion of all applicable courses within 3 years of taking first course (5 years to successfully complete), or if a waiver has been granted by the applicable Region Director for the state, please answer yes.) (Chapter 4.4) Previous Question A.10
Yes = 3 No = 0 | 3 | 3 |
|----------|--|---|---|

SLR Notes:

Yes, all CA PUC pipeline safety engineers have completed the required training within the 3 year time period.

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|----------|--|-----------|-----------|
| 9 | Brief Description of Non-TQ training Activities:
Info Only = No Points

For State Personnel:
Staff member George Carter attended three ASME B31Q meetings being held in Dallas, TX on March 23, 2009, Denver Co on June 22, 2009 and Nashville, TN on October 19, 2009.

For Operators:
Two Mobil Home Park seminars were held in Fresno and San Diego, CA during calendar year 2009. The number of participants who attended the seminar in Fresno, CA was thirty-two and the number attended in San Diego was sixty-three.

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:
CA PUC staff attended several CGA Regional & USA North meetings on damage prevention. | Info Only | Info Only |
|----------|--|-----------|-----------|

SLR Notes:

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|-----------|---|---|---|
| 10 | Did the lead inspectors complete all required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections? (Chapter 4.4.1) Previous Question A.12
Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

SLR Notes:

Yes, all staff members have completed the OQ courses.

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| 11 | Did the lead inspectors complete all required TQ Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.13
Yes = 1 No = 0 | 1 | 1 |
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SLR Notes:

Yes, the following individuals have completed the IMP course: Sunil Shori, Mathewson Epuna, Dennis Lee and Kan Wai Tong.

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| 12 | Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.12
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
787.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 9.16 = 2015.75

Ratio: A / B
787.00 / 2015.75 = 0.39

If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
Points = 5 | 5 | 5 |
|-----------|--|---|---|

SLR Notes:

A. Total Inspection Person Days (Attachment 2) = 787

B. Total Inspection Person Days Charged to the program (220*Number of Inspection person years (Attachment 7) =2015.75

Formula: Ratio = A/B = 787/2015.75946 = 0.39

Rule:- (If Ratio >=.38 then points = 5 else Points = 0.)

Thus Points = 5 Yes, The resulting ratio is 0.39 which exceeds the minimum ratio of 0.38, thus a five point score is awarded.

13 Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe) Previous Info Only Info Only
Question B.13

Info Only = No Points

SLR Notes:

Yes, CA PUC has decided to split the Utilities Safety and Reliability Branch into two separate sections. One section will be the Gas Section and the other will be the Electric Section. The Gas Section will be responsible for performing natural gas safety inspection on those facilities under the CA PUC jurisdiction. Nine engineers will be assigned to the Gas Section and the remaining engineers will be working in the Electric Section. This change will simplify for the accounting, training and personnel who will be performing natural gas safety inspections. In June, 2010, the organization has also requested four new positions be appropriated and assigned to the Gas Section in their 2011-2012 financial budget request.

14 Part-A General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 26

Total possible points for this section: 26



PART B - Inspections and Compliance - Procedures/Records/ Performance

Points(MAX) Score

Inspection Procedures

- 1** Does the State have a written inspection plan to complete the following? (all types of operators including LNG) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG 6.5 6.5
Yes = 6.5 No = 0 Needs Improvement = 50% Deduction
- | | | | | |
|---|---|--------------------------------------|--------------------------|---|
| a | Standard Inspections (Including LNG) (Max points = 2) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | IMP Inspections (Including DIMP) (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | OQ Inspections (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | Damage Prevention (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e | On-Site Operator Training (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f | Construction Inspections (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| g | Incident/Accident Investigations (Max points = 1) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| h | Compliance Follow-up (Max points = 1) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

Yes, Item a; California Public Utilities Commission Gas Pipeline Safety Program General Order 112-E Gas safety audit and compliance inspections (GO112-E Procedures Manual), Section II & III pages 5- 7. Item b; GO112-E Procedures Manual) Section 2-a, page 5. Item c; Section 2-A, page 5. Item d; Section II & III pages 5-7. Item e; this is performed during the standard inspection, pages 5-7. Item f; Section 2-a, page 5. Item g; CA PUC Incident Investigation Procedure Manual covers all these areas. Item h; Section 5, page 13.

- 2** Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1) Previous Question B.2, items a-d are worth .5 point each 2 2
Yes = 2 No = 0 Needs Improvement = 50% Deduction
- | | | | | |
|---|--|--------------------------------------|--------------------------|---|
| a | Length of time since last inspection | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | History of Operator/unit and/or location (including leakage , incident and compliance history) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | Type of activity being undertaken by operator (construction etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | For large operators, rotation of locations inspected | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

Yes, this information is contained in CA PUC GO112-E Procedures Manual , scheduling inspections, page 5 and Mobile Home Procedures Manual, section 2, page 4-6.

Inspection Performance

- 3** Did the state inspect all types of operators and inspection units in accordance with time intervals established in its written procedures? (Chapter 5.1) Previous Question B.3 2 2
Yes = 2 No = 0

SLR Notes:

Yes, all systems were inspected in accordance with the CA PUC inspection requirements and their guidelines.

- 4** Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.4 1 1
Yes = 1 No = 0

SLR Notes:

Yes, CA PUC uses the federal forms for their inspection program.

- 5** Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.5 1 1
Yes = 1 No = 0

SLR Notes:

Yes, a review of all inspection forms performed in the San Francisco office indicated all forms were complete.

- 6** Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.6 .5 .5
Yes = .5 No = 0

SLR Notes:

Yes, one safety related report was submitted and followed up on by staff members in 2009. The location of the safety related report was in the City of Woodland Hills, CA. The operator was Southern California Gas Company.

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| 7 | Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Previous Question B.7 | .5 | .5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

Yes, only PG&E has cast iron pipe in the State of California. The total number of cast iron in the state is approximately 150 miles. CA PUC staff reviews PG&E company's procedures during their O&M audits.

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| 8 | Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Previous Question B.8 | .5 | .5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

Yes, this is accomplished during the Operations, Maintenance and Emergency Response (OM&E) audit. The O&M audit is performed annually and only for larger natural gas operators.

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| 9 | Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Previous Question B.9 | .5 | .5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

Yes, this is reviewed and performed during the staff's Operations, Maintenance and Emergency Response (OM&E) audit.

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|-----------|--|---|---|
| 10 | Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? (NTSB) Previous Question B.10 | 1 | 1 |
| | Yes = 1 No = 0 | | |

SLR Notes:

Yes. All California natural gas operators are required to report damages that occur on their systems to the CA PUC. This is accomplished by a dollar amount and a quarterly reporting requirement. This reporting is above the current incident reporting requirements under the pipeline safety regulations. See CA PUC General Order 112-E, Subpart B, Section 122, "Gas Incident Reports".

Compliance - 60105(a) States

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|-----------|---|---|---|
| 11 | Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.14 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

Yes, a review of database and program files indicate all probable violations were sufficiently documented.

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|-----------|---|---|---|
| 12 | Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question D(1).1 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

Yes, California Public Utilities Commission Gas Pipeline Safety Program General Order 112-E Gas safety audit and compliance inspections (GO112-E Procedures Manual), Section 4, page 12.

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|-----------|--|---|---|
| 13 | Does the state have written procedures to notify an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(4)) Previous Question D (1).2 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

Yes, California Public Utilities Commission Gas Pipeline Safety Program General Order 112-E Gas safety audit and compliance inspections (GO112-E Procedures Manual), Section 4, page 12.

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| 14 | Does the state have a written procedure for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(5)) Previous Question D(1).3 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

Yes, California Public Utilities Commission Gas Pipeline Safety Program General Order 112-E Gas safety audit and compliance inspections (GO112-E Procedures Manual), Section 4 C, page 13.

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|-----------|--|---|---|
| 15 | Has the State issued compliance actions for all probable violations discovered? (Note : PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation) Previous Question D(1).4 | 1 | 1 |
| | Yes = 1 No = 0 | | |

SLR Notes:

Yes, California Public Utilities Commission Gas Pipeline Safety Program General Order 112-E Gas safety audit and compliance inspections (GO112-E Procedures Manual), Section 4, page 12.

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| 16 | Did the state follow its written procedures for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? Previous Question D(1).5 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

Yes, California Public Utilities Commission Gas Pipeline Safety Program General Order 112-E Gas safety audit and compliance inspections (GO112-E Procedures Manual), Section 4 C, page 13.

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|-----------|---|---|---|
| 17 | If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (check each states enforcement procedures) Previous Question D(1).6 | 1 | 1 |
| | No = 0 Yes = 1 | | |

SLR Notes:

Yes, California Public Utilities Commission Gas Pipeline Safety Program General Order 112-E Gas safety audit and compliance inspections (GO112-E Procedures Manual), Section 5, page 13.

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|-----------|---|---|---|
| 18 | Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question D(1).7 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

Yes, a review in the electronic database indicated all probable violations are issued and tracked for compliance until the violations have been corrected. CA PUC allows the operators forty-five to ninety days to correct the violation.

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| 19 | Were compliance actions sent to a company officer? (manager or board member if municipal/government system) (Chapter 5.1(4)) Previous Question D(1).8 | .5 | .5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

Yes, a review of the electronic database and file folders for calendar year 2009 indicated all compliance action correspondence is being sent to the company officers. This procedure needs to be written and included in the GO112-E Procedures Manual.

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| 20 | Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question D(1).9 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

Yes, GO112-E Procedures Manual, Section 4C, page 13.

Compliance - 60106(a) States

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|-----------|--|---|----|
| 21 | Did the state use the current federal inspection form(s)? Previous Question D(2).1 | 1 | NA |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

N/A

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|-----------|---|---|----|
| 22 | Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2 | 1 | NA |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

N/A

23	Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(2).3 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

N/A

24	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(2).4 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

N/A

25	Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(2).5 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

N/A

26	Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Previous Question D(2).6 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

N/A

27	Part B: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only
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SLR Notes:

See question 19 pertaining to recommendations.

Total points scored for this section: 25
Total possible points for this section: 25



PART C - Interstate Agent States

Points(MAX) Score

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| 1 | Did the state use the current federal inspection form(s)? Previous Question D(3).1
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
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SLR Notes:

The California Public Utilities Commission is not an Interstate Agent.

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| 2 | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? Previous Question D(3).2
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
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SLR Notes:

The California Public Utilities Commission is not an Interstate Agent.

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| 3 | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? Previous Question D(3).3
Yes = 1 No = 0 | 1 | NA |
|----------|--|---|----|

SLR Notes:

The California Public Utilities Commission is not an Interstate Agent.

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| 4 | Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(3).4
Yes = 1 No = 0 | 1 | NA |
|----------|---|---|----|

SLR Notes:

The California Public Utilities Commission is not an Interstate Agent.

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|----------|--|---|----|
| 5 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(3).5
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

The California Public Utilities Commission is not an Interstate Agent.

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| 6 | Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(3).6
Yes = 1 No = 0 | 1 | NA |
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SLR Notes:

The California Public Utilities Commission is not an Interstate Agent.

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| 7 | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? Previous Question D(3).7
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
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SLR Notes:

The California Public Utilities Commission is not an Interstate Agent.

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|----------|---|-----------|-----------|
| 8 | Part C: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

The California Public Utilities Commission is not an Interstate Agent.

Total points scored for this section: 0
Total possible points for this section: 0

PART D - Incident Investigations

Points(MAX) Score

- | | | | |
|----------|--|---|---|
| 1 | Are state personnel following the procedures for Federal/State cooperation in case of an incident? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6.1) Previous Question E.1
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. All procedures have been followed for Federal/State cooperation during all reportable incidents during calendar year 2009. This was confirmed by PHMSA Western Region Office.

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|----------|---|----|----|
| 2 | Are state personnel familiar with the jurisdictional authority and Memorandum of Understanding between NTSB and PHMSA? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6 ? Appendix D) Previous Question E.2
Yes = .5 No = 0 | .5 | .5 |
|----------|---|----|----|

SLR Notes:

Yes, Sunil Shori response, "the memorandum of understanding is located in the Guidelines for States Participating in the Pipeline Safety".

- | | | | |
|----------|--|---|---|
| 3 | Did the state keep adequate records of incident notifications received? Previous Question E.3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes, CA PUC keeps telephonic incident reports in an electronic data base program located on the commission's computer system. All incident reports submitted in attachment 4 of the 2010 Certification document was checked and verified as complete and accurate.

- | | | | |
|----------|--|---|---|
| 4 | If an onsite investigation of an incident was not made, did the state obtain sufficient information by other means to determine the facts and support the decision not to go on-site? Previous Question E.4
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes, all incidents reported by the operators are investigated and maintained in the CA PUC incident database.

- | | | | |
|----------|---|--------------------------------------|--|
| 5 | Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question E.5, comprehensive question worth 2 points total
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| a. | Observations and Document Review | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Contributing Factors | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c. | Recommendations to prevent recurrences where appropriate | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

SLR Notes:

Yes, a review of five incident reports completed by CA PUC staff indicated the investigations were thorough and conclusions were made in an acceptable manner.

- | | | | |
|----------|---|---|---|
| 6 | Did the state initiate enforcement action for violations found during any incident investigation(s)? Previous Question E.6 Variation
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes, a review of the incident reports and letters indicated adequate enforcement action was taken when a violation was cited by CA PUC.

- | | | | |
|----------|--|----|-----|
| 7 | Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate annual report data from operators concerning incidents/accidents and investigate discrepancies) (Chapter 6) Previous Question E.7/E.8
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes. California Public Utilities Commission has responded to the PHMSA Western Region within one to two days of an accident or information pertaining to incident reports or other follow-up information requested.

- | | | | |
|----------|---|-----------|-----------|
| 8 | Part D: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

Total points scored for this section: 7
Total possible points for this section: 7



PART E - Damage Prevention Initiatives

Points(MAX) Score

- | | | | |
|----------|--|---|---|
| 1 | Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies? Previous Question B.11
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Yes, this is checked during the Operations, Maintenance and Emergency Plan inspection. The CA PUC using PHMSA forms 1 & 2, Standard Inspection Plan of Gas Distribution and Gas Transmission Pipeline, check this item under section entitled Damage Prevention Program Procedures.

- | | | | |
|----------|--|---|---|
| 2 | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? New 2008
Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Yes, this is checked during the standard inspection or incident investigations performed by CA PUC staff on all operators. Additionally, each member checks the operator's records on a sample basis to insure requests for locate were responded to correctly and timely.

- | | | | |
|----------|---|---|---|
| 3 | Did the state encourage and promote the adoption of the Common Ground Alliance Best Practices document to its regulated companies as a means of reducing damages to all underground facilities? Previous Question A.7
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Yes, California Public Utilities Commission has been working with organizations in promoting best practices to adoption of the Common Ground Alliance Best Practices Version 7 document in areas to improve their state damage prevention. This action is conducted at California CGA Meetings and committee discussions.

- | | | | |
|----------|---|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? New 2008
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes, CA PUC has a requirement that all operators have to submit quarterly summary reports on the damages that occur on their systems. This information is posted in a CA PUC Damage Prevention database program. This information is reviewed quarterly and is being considered by the agency as a base for risk assessment of operators.

- | | | | |
|----------|--|---|---|
| 5 | Did the state review operators' records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617?
Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Yes, this is reviewed in the incident database program.

- | | | | |
|----------|---|-----------|-----------|
| 6 | Part E: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

Total points scored for this section: 9
Total possible points for this section: 9

PART F - Field Inspection

Points(MAX) Score

- | | | | |
|----------|--|-----------|-----------|
| 1 | Operator, Inspector, Location, Date and PHMSA Representative | Info Only | Info Only |
| | Info Only = No Points | | |

Name of Operator Inspected:

Redwood Mobile Estates

Name of State Inspector(s) Observed:

Dennis Lee, Utilities Engineer

Location of Inspection:

City of Redwood, California

Date of Inspection:

October 27, 2010

Name of PHMSA Representative:

Glynn Blanton, PHMSA State Programs, Tom Finch, PHMSA Western Region

SLR Notes:

Sunil Shori Utilities Engineer and Tom Finch, PHMSA Western Region was present during the inspection visit. A standard inspection and records review was performed in the Redwood Mobile Estates office.

- | | | | |
|----------|---|---|---|
| 2 | Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? New 2008 | 1 | 1 |
| | Yes = 1 No = 0 | | |

SLR Notes:

Yes, Redwood Mobile Estates was notified by letter from the California Public Utilities Commission about the scheduled inspection on October 18, 2010.

- | | | | |
|----------|--|---|---|
| 3 | Did the inspector use an acceptable inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) Previous Question F.2 | 2 | 2 |
| | Yes = 2 No = 0 | | |

SLR Notes:

Yes, Dennis Lee used the California Public Utilities Commission Mobilehome Park Gas/Propane System Inspection Report form.

- | | | | |
|----------|--|---|---|
| 4 | Did the inspector thoroughly document results of the inspection? Previous Question F.3 | 2 | 2 |
| | Yes = 2 No = 0 | | |

SLR Notes:

Yes, Dennis Lee, Utilities Engineer was very thorough in the review of the operator's records and the performance of the operator's facilities. In this regard, he reviewed the operator's meter sets, valve locations, master meter regulator station, and obtained cathodic protection readings at the inlet and outlet side of the master meter station. Several areas of concerns were found and noted in the inspection form.

- | | | | |
|----------|---|---|---|
| 5 | Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, pyrometer, soap spray, CGI, etc.) New 2008 | 1 | 1 |
| | Yes = 1 No = 0 | | |

SLR Notes:

Yes, Dennis Lee requested at the start of the inspection review to see the operator's tools and equipment used to maintain the system.

- | | | | |
|----------|---|-----------|-----------|
| 6 | What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) New 2008 | Info Only | Info Only |
| | Info Only = No Points | | |

SLR Notes:

Master Meter Inspection was performed.

- | | | | |
|----------|--|-------------------------------------|---|
| 7 | Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total | 2 | 2 |
| | Yes = 2 No = 0 Needs Improvement = 1 | | |
| | a. Procedures | <input checked="" type="checkbox"/> | |
| | b. Records | <input checked="" type="checkbox"/> | |
| | c. Field Activities/Facilities | <input checked="" type="checkbox"/> | |

d. Other (Please Comment)

☐

SLR Notes:

Yes. Dennis Lee reviewed the operator's procedures, records and conducted a field activity review of the entire system.

- | | | | |
|----------|---|---|---|
| 8 | Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Liaison will document reasons if unacceptable) Previous Question F.8
Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Yes, Dennis Lee demonstrated an adequate knowledge of the pipeline safety regulations and the California Public Utilities Commission's rules.

- | | | | |
|----------|--|---|---|
| 9 | Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) Previous Question F.10
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes, an exit interview was performed by Dennis Lee with Maria Martinez, Park Manager, Redwood Mobile Estates after the inspection was completed.

- | | | | |
|-----------|--|---|---|
| 10 | During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question F.11
Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

Yes, several probable violations were found, noted and discussed with the operator during the exit interview. The operator was provided a copy of the violations found and an action plan to be provided to the California Public Utilities Commission on steps that will be taken to correct the violations.

- | | | | |
|-----------|---|-----------|-----------|
| 11 | What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

Observed several meter sets that were not installed correctly, found numerous service lines that were not cathodically protected from corrosion, failure to install pipeline markers along the gas main, and failure to repair leaks found during the most recently performed leakage survey.

- | | | | |
|-----------|--|-----------|-----------|
| 12 | Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

SLR Notes:

No best practices were found or observed that could be shared with other states during the field inspection.

- | | | | |
|-----------|--|-------------------------------------|-----------|
| 13 | Field Observation Areas Observed (check all that apply)
Info Only = No Points | Info Only | Info Only |
| | a. Abandonment | <input type="checkbox"/> | |
| | b. Abnormal Operations | <input type="checkbox"/> | |
| | c. Break-Out Tanks | <input type="checkbox"/> | |
| | d. Compressor or Pump Stations | <input type="checkbox"/> | |
| | e. Change in Class Location | <input type="checkbox"/> | |
| | f. Casings | <input type="checkbox"/> | |
| | g. Cathodic Protection | <input checked="" type="checkbox"/> | |
| | h. Cast-iron Replacement | <input type="checkbox"/> | |
| | i. Damage Prevention | <input type="checkbox"/> | |
| | j. Deactivation | <input type="checkbox"/> | |
| | k. Emergency Procedures | <input checked="" type="checkbox"/> | |
| | l. Inspection of Right-of-Way | <input type="checkbox"/> | |
| | m. Line Markers | <input checked="" type="checkbox"/> | |
| | n. Liaison with Public Officials | <input checked="" type="checkbox"/> | |
| | o. Leak Surveys | <input checked="" type="checkbox"/> | |
| | p. MOP | <input type="checkbox"/> | |
| | q. MAOP | <input type="checkbox"/> | |

r.	Moving Pipe	<input type="checkbox"/>
s.	New Construction	<input type="checkbox"/>
t.	Navigable Waterway Crossings	<input type="checkbox"/>
u.	Odorization	<input checked="" type="checkbox"/>
v.	Overpressure Safety Devices	<input checked="" type="checkbox"/>
w.	Plastic Pipe Installation	<input type="checkbox"/>
x.	Public Education	<input checked="" type="checkbox"/>
y.	Purging	<input type="checkbox"/>
z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input type="checkbox"/>
B.	Signs	<input type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input checked="" type="checkbox"/>
E.	Vault Maintenance	<input type="checkbox"/>
F.	Welding	<input type="checkbox"/>
G.	OQ - Operator Qualification	<input checked="" type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input type="checkbox"/>
J.	Other	<input type="checkbox"/>

SLR Notes:

This was a very thorough and detailed review of the operator's facilities.

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

This was a very thorough and detailed review of the operator's facilities.

Total points scored for this section: 12
Total possible points for this section: 12



PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

Risk base Inspections - Targeting High Risk Areas

- | | | | |
|----------|---|-----|-----|
| 1 | Does state have process to identify high risk inspection units?
Yes = 1.5 No = 0 | 1.5 | 1.5 |
|----------|---|-----|-----|

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

History of Individual Operator units (leakage, incident and compliance history, etc.)

Threats - (Excavation Damage, Corrosion, Natural Forces, Other Outside Forces, Material or Welds, Equipment, Operations, Other)

SLR Notes:

Yes, California Public Utilities Commission's Criteria in section 2, scheduling inspections page 5, addresses several of these threats. However, additional language or a process needs to be reviewed and considered in the GO112-E Procedures Manual. The items to be reviewed are miles of HCA's, population density, geographic area, threats which include corrosion, material, welding, and other.

- | | | | |
|----------|--|----|-----|
| 2 | Are inspection units broken down appropriately? (see definitions in Guidelines)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes. Inspection units are broken down using the guidelines for states participating in the pipeline safety program and other information available to them for the operators that have jurisdiction authority over.

- | | | | |
|----------|--|-----------|-----------|
| 3 | Consideration of operators DIMP Plan? (if available and pending rulemaking)
Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

SLR Notes:

Yes, staff members have been contacted by a few operators inquiring about the DIMP rule and proposed plan.

- | | | | |
|----------|--|----|---|
| 4 | Does state inspection process target high risk areas?
Yes = .5 No = 0 | .5 | 0 |
|----------|--|----|---|

SLR Notes:

No. Risk ranking has been considered but will be included in the GO112-E Procedures Manual.

Use of Data to Help Drive Program Priority and Inspections

- | | | | |
|----------|--|----|-----|
| 5 | Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, California Public Utilities Commission uses the quarterly incident data as a method to use to track the effectiveness of their state's damage prevention efforts.

- | | | | |
|----------|---|----|-----|
| 6 | Has state reviewed data on Operator Annual reports for accuracy?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes, this is reviewed as the reports are filed by the operator and prior to and during the inspections.

- | | | | |
|----------|--|----|-----|
| 7 | Has state analyzed annual report data for trends and operator issues?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, this is reviewed during the filing of the annual reports.

- | | | | |
|----------|---|----|-----|
| 8 | Has state reviewed data on Incident/Accident reports for accuracy?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes, this is reviewed as the incident report is submitted by the operator. If information is not complete or inaccurate on the report, the on-call engineer will

9	Does state do evaluation of effectiveness of program based on data? (i.e. performance measures, trends, etc.)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, this is accomplished through the branch's semi-annual reports submitted by the program manger to the Division Director.

10	Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections? Previous Question B.15	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, this was initially accomplished by two engineers assigned to enter the operator qualification inspection results into the web based database. Agency is trying to enter the remaining reports in a timely manner by allowing all staff members access to the database program.

11	Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? Previous Question B.16	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, they responded to the IMDB.

12	Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, Lodi and Wild Goose, now Niska Gas Company, IMP Federal Protocols results were uploaded into the IMDB database in calendar year 2009.

13	Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? Previous Question B.18	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, operators are currently providing information to CA PUC including actions to correct any safety concerns.

14	Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission?	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, this is reviewed with the transmission operator during the OM&E inspection. Staff members use the PHMSA inspection form during their review of the operator's facilities.

Accident/Incident Investigation Learning and Sharing Lessons Learned

15	Has state shared lessons learned from incidents/accidents? (i.e. NAPSRS meetings and communications)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, information on incidents and accidents are presented at the annual NAPSRS Western Region Meetings and during NAPSRS Board of Director's conference calls. The agency also makes available information on their inspection program and results on the agency's web site.

16	Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, they participate in all NAPSRS and data committees seeking information on data regarding accidents.

17	Does state have incident/accident criteria for conducting root cause analysis?	Info Only	Info Only
	Info Only = No Points		

SLR Notes:

Yes, as a part of their investigative process they conduct a root cause analysis were it is appropriate.

18 Does state conduct root cause analysis on incidents/accidents in state?

Info Only Info Only

Info Only = No Points

SLR Notes:

Yes, as a part of their investigative process they conduct a root cause analysis. Root cause analysis training has been provided to their staff by an outside contractor.

19 Has state participated on root cause analysis training? (can also be on wait list)

.5

0.5

Yes = .5 No = 0

SLR Notes:

Yes, Root cause analysis training has been provided to their staff by an outside contractor and they are currently wait listed to attend the TQ training course in Oklahoma City, OK in 2011.

Transparency - Communication with Stakeholders

20 Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.)

.5

0.5

Yes = .5 No = 0

SLR Notes:

Yes, this is accomplished through California Regional CGA and USA North Call center meeting participation, bulletins send to all small operators on public awareness issues and other associated organizations dealing with pipeline safety matters.

21 Does state share enforcement data with public? (Website, newsletters, docket access, etc.)

.5

0.5

Yes = .5 No = 0

SLR Notes:

Yes, CA PUC enforcement data is posted on the agency's website, open dockets for any proceedings and other commission agenda items.

22 Part G: General Comments/Regional Observations

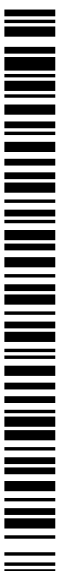
Info Only Info Only

Info Only = No Points

SLR Notes:

See questions 1 & 4 pertaining to recommendations or loss of points.

Total points scored for this section: 9.5
Total possible points for this section: 10



PART H - Miscellaneous

Points(MAX) Score

- | | | | |
|----------|---|----|-----|
| 1 | What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPSR Activities and Participation, etc.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Staff continued to work with the California Regional CGA in the development of an enforcement model for damage prevention, efforts have been made in the development of legislation to transfer master meter systems back under the control of the utility company in the area of where the master meter system is located and they continue to use their enforcement authority to reduce the number of violations cited against the mobile home operators. Additionally, the agency held two seminars for the mobile home park operators and larger number of participants attend the meeting than in previous years.

- | | | | |
|----------|--|----|-----|
| 2 | What legislative or program initiatives are taking place/planned in the state, past, present, and future? (Describe initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

CA PUC administrative rules are in the process of being updated to include changes in construction, reporting and revision of sections that are outdated, and necessary modifications to Subpart E and F of General Order No. 112-E. CA PUC staff is requesting enhancement of statistic data from investor public utilities on their system inspection units to obtain more information about the risk, threats and operation of the system.

- | | | | |
|----------|--|----|-----|
| 3 | Any Risk Reduction Accomplishments/Projects? (i.e. Cast iron replacement projects, bare steel, third-party damage reductions, etc.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, CA PUC has directed PG&E to reduce their cast iron pipelines and copper service lines. In this regard, PG&E in 2009 removed 27.4 miles of cast iron mains and 5,629 copper services in their service areas. CA PUC continues to monitor the meter protection program that PG&E is performing to protect outside meter sets from being damaged. In 2009, PG&E resolved 554 meter protection locations and performed 176 corrective actions.

- | | | | |
|----------|--|---|---|
| 4 | Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA?
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes, they responded to all request from NAPSR and PHMSA on survey and other relative information.

- | | | | |
|----------|---|----|-----|
| 5 | Sharing Best Practices with Other States - (General Program)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes, information requested from Colorado Public Utilities Commission and Washington State pertaining to material used by the operators in their state was provided.

- | | | | |
|----------|---|-----------|-----------|
| 6 | Part H: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

Total points scored for this section: 3
Total possible points for this section: 3

PART I - Program Initiatives

Points(MAX) Score

Drug and Alcohol Testing (49 CFR Part 199)

- | | | | |
|----------|---|---|---|
| 1 | Has the state verified that operators have drug and alcohol testing programs?
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes, this is accomplished during the Drug and Alcohol inspection performed on the operator with PHMSA forms.

- | | | | |
|----------|--|----|-----|
| 2 | Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, this is reviewed during the audit review of the operator. CA PUC uses the PHMSA form for their review of the operator.

- | | | | |
|----------|---|----|-----|
| 3 | Is the state verifying that any positive tests are responded to in accordance with the operator's program?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes, this is reviewed during the audit and if a positive test was found information on how the item was corrected is checked.

Qualification of Pipeline Personnel (49 CFR Part 192 Subpart N)

- | | | | |
|----------|---|---|---|
| 4 | Has the state verified that operators have a written qualification program?
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes, all operators were reviewed in 2009 for compliance with the OQ requirement.

- | | | | |
|----------|--|----|-----|
| 5 | Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, a review of their files indicated operators were checked for compliance with PHMSA rules and regulation on the operator qualification program.

- | | | | |
|----------|--|----|-----|
| 6 | Is the state verifying that persons who perform covered tasks for the operator are qualified in accordance with the operator's program?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, this is accomplished during the standard inspection performed on all operators.

- | | | | |
|----------|--|----|-----|
| 7 | Is the state verifying that persons who perform covered task for the operator are requalified at the intervals specified in the operator's program?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, this is accomplished during the standard inspection performed on all operators.

Gas Transmission Pipeline Integrity Management (49 CFR Part 192 Subpart O)

- | | | | |
|----------|--|---|---|
| 8 | Has the state verified that all operators with transmission pipelines have either adopted an integrity management program (IMP), or have properly determined that one is not required?
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes, this was accomplished in two stages. The first stage was an informal meeting with the company officials. The second stage was a complete audit of each operator who has an integrity management program.

- | | | | |
|----------|--|----|-----|
| 9 | Has the state verified that in determining whether a plan is required, the operator correctly calculated the potential impact radii and properly applied the definition of a high consequence area?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, the state verified that the operator had correctly calculated the potential impact radii during the complete audit performed. They continue to meet and discuss this item and other items during their normal inspection reviews.

- | | | | |
|-----------|---|----|-----|
| 10 | Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan)
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|---|----|-----|

SLR Notes:

Yes, the state verified that their operators, except Southwest Gas Company, have complied with Subpart O during their inspection reviews. Southwest Gas Company's program has been reviewed by their staff members during a mutual meeting with PHMSA, Arizona Corporation Commission and Nevada Public Service Commission.

- | | | | |
|-----------|--|----|-----|
| 11 | Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, including that they are being done in the manner and schedule called for in its IMP?
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

Yes, the state is monitoring the operators' progress in completing the IMP requirements as indicated in their inspection report documentation.

- | | | | |
|-----------|--|----|-----|
| 12 | Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs?
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

Yes, this is checked during their IM audit and other field inspection verification.

Public Awareness (49 CFR Section 192.616)

- | | | | |
|-----------|--|----|-----|
| 13 | Has the state verified that each operator has developed a continuing public awareness program? (due date was 6/20/06 for most operators, 6/20/07 for certain very small operators, 6/13/08 for master meters)
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

Yes, this was checked by staff members as the operator submitted their results into the Clearinghouse.

- | | | | |
|-----------|--|----|-----|
| 14 | Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)?
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

Yes, CA PUC verified this information through the Clearinghouse and performed a follow-up with the operator via the standard inspection review.

- | | | | |
|-----------|--|----|-----|
| 15 | Is the state verifying that operators are conducting the public awareness activities called for in its program?
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

Yes, CA PUC uses the PHMSA inspection form to verify that the operator is conducting the public awareness activities.

- | | | | |
|-----------|---|-----------|-----------|
| 16 | Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162?
Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

Yes, discussions have been conducted with operators about this item but CA PUC is waiting for PHMSA to provide a method to effectively measure this item.

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| 17 | Part I: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

Total points scored for this section: 9
Total possible points for this section: 9