

West Coast Gas Company Inc.

9203 Beatty Drive, Sacramento, CA 95826

916-364-4100 / Fax 916-364-4200

Email: westgas@aol.com / www.westcoastgas.com

18 May 2020

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 May 12, 2020

Dear Mr. Eng,

Following is West Coast Gas Company Inc.'s response to the SED findings for the GO 112-F Inspection which occurred on May 4 through May 8, 2020.

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:

Victor Muller, SED

Dmitriy Lysak, SED

Dennis Lee, SED

Claudia Almengor, SED

Raymond Czahar, WCG

Cynthia Morris, WCG

Post-Inspection Written Preliminary Findings

Date of Transmittal: 05/12/2020

Dates of Inspection: 5/4/2020-5/8/2020

Operator: WEST COAST GAS CO INC

Operator ID: 31267 (primary)

Inspection Systems: WCG OQ and DIMP Programs

Assets (Unit IDs): West Coast Gas (88675)

System Type: GD

Inspection Name: WCG DIMP & OQ

Lead Inspector: Victor Muller

Operator Representative: Mark Williams

Unsatisfactory Results

Topical Content (OQ, PA, CRM): Operator Qualification (MISCTOPICS.OPTRQUAL)

Question Text Are records maintained for changes that affect covered tasks and significant OQ plan changes?

References 192.805(i) (192.805(f))

Assets Covered West Coast Gas (88675 (34))

Issue Summary The WCG's OQ plan defines Significant Changes on page 4 as follows:

Significant Changes Means the following as it related to the Plan:

- 1) *Wholesale changes to the program*
- 2) *Change in evaluation methods, i.e. performance and written to written only*
- 3) *Increases in evaluation intervals, i.e. from 1 to 5 years*
- 4) *Increasing span of control ratios*
- 3) *Removal of covered tasks, not including combining covered tasks*

WCG's OQ plan states on page 23:

Significant Plan written program changes should be identified and have the appropriate regulatory agency notified once the changes of the program have been reviewed and approved by the Operations Manager. When directed by the Operations Manager, the Office Manager will transmit the revised Plan to the CPUC San Francisco headquarters office as follows...

Title 49 CFR §192.805(i) states:

(i) After December 16, 2004, notify the Administrator or a state agency participating under 49 U.S.C. Chapter 601 if the operator significantly modifies the program after the administrator or state agency has verified that it complies with this section. Notifications to PHMSA may be submitted by electronic mail to InformationResourcesManager@dot.gov, or by mail to ATTN: Information Resources Manager DOT/PHMSA/OPS, East Building, 2nd Floor, E22-321, New Jersey Avenue SE., Washington, DC 20590

The install tracer wire, Squeeze off pipe (PE plastic) and, Repair/tie in polyethylene pipe tasks changed from 1 year to 5 year reevaluation intervals in the 7/11/2017 update to WCG's OQ plan. These changes constitute significant changes as defined by WCG's OQ plan and should have been reported to SED as required by both Title 49 CFR §192.805(i) and WCG's OQ plan. SED finds WCG in violation of Title 49 CFR §192.805(i) for failure to report significant modification to WCG's operator qualification program.

WCG'S RESPONSE

West Coast Gas Company Inc. would like to thank the SED for conducting the audit by email and conference calls. We found this to be an effective way of communicating during this current situation.

WCG has updated is binder cover to reflect the need for communicating changes to the CPUC, see attachment A.

WCG has also updated its OQ 01 Page 4 to reflect the need for communicating changes to the CPUC, see attachment B.

WCG is committed to improving its OQ Plan and any further significant changes will be communicated to the CPUC at

Program Manager, Gas Safety & Reliability Branch, Safety & Enforcement Division, California Public Utilities Commission, 5050 Van Ness Avenue, San Francisco, CA 94102.



WEST COAST GAS
INCORPORATED

OPERATOR

QUALIFICATION

PLAN

05.18.2020

Significant changes need to be submitted to the CPUC



WEST COAST GAS
INCORPORATED

Operator Qualification Plan

| | |
|----------------------|-------------------------------|
| REVISION DATE | OQ 1 |
| May 18, 2020 | Supersedes All Previous Dates |

INTRODUCTION TO OPERATOR QUALIFICATION

Qualified

Means that an individual has been evaluated and has passed an evaluation and:

- 1) Can perform assigned covered tasks
- 2) Can recognize and react to abnormal operating conditions that may be encountered while performing a particular covered task
- 3) Demonstrate technical knowledge required to perform the covered task.
 - a) Demonstrate technical skills required to perform the covered task
 - b) Meet the physical abilities required to perform the specific covered task
- 4) Compliance documentation is completed.

Safety or Integrity

Means the reliable condition of a pipeline facility (operationally sound or having the ability to withstand stresses imposed) affected by any operation, maintenance or construction task, and/or an emergency response.

Significant Changes

Means the following as it related to the Plan:

- 1) Wholesale changes to the program
- 2) Change in evaluation methods, i.e. performance and written to written only
- 3) Increases in evaluation intervals, i.e. from 1 to 5 years
- 4) Increasing span of control ratios

- 5) Removal of covered tasks, not including combining covered tasks

Significant changes are to be submitted to CPUC.

Refer to: OQ 8, Communicating Covered Task Changes, paragraph "COMMUNICATING SIGNIFICANT PLAN CHANGES TO STATE AGENCY".

Skill

Means the ability to perform mental and physical activities acquired or developed through training or experience.

PERSONNEL AND RESPONSIBILITIES

Operations Manager

The Operations Manager is responsible for the total administration of this Plan, which includes:

- 1) Maintenance of the complete OQ Plan, including material incorporated by reference
- 2) Distribution of up-to-date copies of the Plan to appropriate personnel
- 3) Provision of the Plan available for inspection by authorized agents of regulatory agencies
- 4) Assurance that all milestones, periodic evaluation intervals, etc. are conducted as specified in this Plan
- 5) Notification to all company employees in advance of the date that an employee's current qualification will expire
- 6) Scheduling evaluations