

2017 Annual Report

Alpine Natural Gas Operating Company No. 1, LLC.

Gas Safety Plan Annual Submittal

In partial fulfillment of General Order 112 -F Subsection 123.2

By:

Michael Lamond, CFO

Date: 3/23/2017

The following data have been prepared to comply with G.O. 112-F Section 123.2 and 123.3 Information by Michael Lamond, CFO and the facts contained in the information are true and correct to the best knowledge of the officer, above.

(a-e) Number of gas leaks repaired...

Response:

Alpine provides, Appendix 4 from SED's 2016 Data Request, as an attachment to answer this information. No incidence of where the facilities MAOP was exceeded.

(f) Number of employees...

Response:

Alpine has 2 full time qualified operators.

(g) Metrics to be tracked per 49 CFR part 192.945(a)

Response:

Subpart O does not apply to Alpine as it is not a transmission operator. Alpine is gas distribution only.

(h) Excavation Damage Prevention Related Data

Response:

No damages from homeowners.
4 excavation dig ins to customer service lines by Contractors,
less than \$500.00 in damages.

(i) Lost and Unaccountable for Gas

Response:

Alpine's 2016 LUAF was 1.6%

(j) Public Liaison Activities

Response: One scheduled and One performed December 22, 2016
Invited; Calaveras Sheriffs Office, Public Works and Calaveras
County Consolidated Fire Department
Attended: All but Calaveras County Public Works

(k) Gas Safety Plan

Response: Alpine filed its Gas Safety Plan in June 2013 it is
provided as an attachment.

Alpine Natural Gas

Rulemaking (R.) 15-01-008 to Adopt Rules and Procedures Governing Commission Regulated Natural Gas Pipelines and Facilities to Reduce Natural Gas Leaks Consistent with Senate Bill 1371, Leno.
and in Response to Data Request [Company Name] R15-01-008 2016 May Report

3/22/2017
Appendix 4 Rev. 4/4/16

Pursuant to SB 1371, Leno - Natural gas leakage abatement, the California Public Utilities Commission (CPUC) requests that the following information be transmitted to the CPUC and the State Air Resources Board (ARB):
Note - Definitions in Data Request [Company Name] R15-01-008 2016 May Report

The following questions in the above mentioned data requests are answered using the spreadsheets in this Appendix (#4):

- (2) A List of new graded gas leaks discovered, tracked by geographic location in a Geographic Information System (GIS) or best equivalent, by grade, component or equipment, pipe size, schedule and material, pressure, age, date discovered and annual volume of gas leaked for each, by month, from January 1st through December 31st of the previous calendar year.
- (3) List of graded gas leaks repaired, tracked by geographic location in a Geographic Information System (GIS) or best equivalent, by month, from January 1st through December 31st of the previous calendar year. Include the grade, component or equipment, pipe size, schedule and material, pressure, age, date discovered, date of repair, annual volume of gas leaked for each and the number of days from the time the leak was discovered until the date of repair.
- (4) List of ALL open graded leaks, regardless of when they were found, tracked by geographic location in a Geographic Information System (GIS) or best equivalent, that are being monitored or are scheduled to be repaired, by month, from January 1st through December 31st of the previous calendar year. Include the grade, component or equipment, pipe size, schedule and material, pressure, age, date discovered, scheduled date of repair, and annual volume of methane leaked for each.

Response:

Distribution Main & Service Pipeline Damage (3rd party dig-ins, natural disasters, etc.):

ID	Geographic Location	Damage Type	Pipe Classification	Pipe Material	Pipe Schedule	Pipe Size (nominal)	Pipe Age (months)	Pressure (psi)	Leak Above Ground or Below Ground	Discovery Date (MM/DD/YY)	Time call received (24 Hr Clock)	Time condition made safe-shutoff	Permanent Repair Date (MM/DD/YY)	Number of Days Until Repair (Days)	Repair Date (MM/DD/YY)	Number of Days	Emission Factor or Engineering Estimate	Repair less than 14 days	Explanatory Notes / Comments
01/02/16	95252	E	DB	P.E.		3/4"	2	42 psig	1 Above Gr	01/02/16	11:30	11:50	01/02/16	0	01/02/16	0	0.0089	Yes	3rd party excavation no USA ticket
05/12/16	95252	E	DB	P.E.		3/4"	181	42 psig	1 Below Gr	05/12/16	10:50	11:05	05/12/16	0	05/12/16	0	0.0089	Yes	3rd party excavation no USA ticket
08/16/16	95252	E	DB	P.E.		3/4"	170	42 psig	1 Below Gr	08/16/16	14:26	14:40	08/16/15	0	08/16/16	0	0.0089	Yes	3rd party excavation no USA ticket
11/09/16	95252	E	DB	P.E.		3/4"	147	42 psig	1 Below Gr	11/09/16	10:39	10:50	11/09/16	0	11/09/16	0	0.0089	Yes	3rd party excavation no USA ticket

NOTICE: This report is required by 49 CFR Part 191. Failure to report can result in a civil penalty not to exceed 100,000 for each violation for each day that such violation persists except that the maximum civil penalty shall not exceed \$1,000,000 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 5/31/2018



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

Initial Date Submitted:

02/09/2017

Form Type:

INITIAL

Date Submitted:

**ANNUAL REPORT FOR
CALENDAR YEAR 2016
GAS DISTRIBUTION SYSTEM**

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0629. Public reporting for this collection of information is estimated to be approximately 16 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Important: Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at <http://www.phmsa.dot.gov/pipeline/library/forms>.

PART A - OPERATOR INFORMATION

(DOT use only)

20176289-30536

1. Name of Operator	ALPINE NATURAL GAS
2. LOCATION OF OFFICE (WHERE ADDITIONAL INFORMATION MAY BE OBTAINED)	
2a. Street Address	15 St. Andrews Rd. Suite 7 P.O. Box 550
2b. City and County	Valley Springs
2c. State	CA
2d. Zip Code	95252
3. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER	31515
4. HEADQUARTERS NAME & ADDRESS	
4a. Street Address	15 ST ANDREWS RD #7
4b. City and County	VALLEY SPRINGS ,US
4c. State	CA
4d. Zip Code	95252
5. STATE IN WHICH SYSTEM OPERATES	CA
6. THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP (Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.)	
Natural Gas	
7. THIS REPORT PERTAINS TO THE FOLLOWING TYPE OF OPERATOR (Select Type of Operator based on the structure of the company included in this OPID for which this report is being submitted.):	
Privately Owned	

PART B - SYSTEM DESCRIPTION

1.GENERAL

	STEEL				PLASTIC	CAST/ WROUGHT IRON	DUCTILE IRON	COPPER	OTHER	RECONDITION ED CAST IRON	SYSTEM TOTAL
	UNPROTECTED		CATHODICALLY PROTECTED								
	BARE	COATED	BARE	COATED							
MILES OF MAIN	0	0	0	0.01	37.44	0	0	0	0		37.45
NO. OF SERVICES	0	0	0	0	1559	0	0	0	0		1559

2.MILES OF MAINS IN SYSTEM AT END OF YEAR											
MATERIAL	UNKNOWN	2" OR LESS	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8" THRU 12"	OVER 12"	SYSTEM TOTALS				
STEEL	0	0.001	0.009	0	0	0	.01				
DUCTILE IRON	0	0	0	0	0	0	0				
COPPER	0	0	0	0	0	0	0				
CAST/WROUGHT IRON	0	0	0	0	0	0	0				
PLASTIC PVC	0	0	0	0	0	0	0				
PLASTIC PE	0	28.21	3.57	5.655	0	0	37.435				
PLASTIC ABS	0	0	0	0	0	0	0				
PLASTIC OTHER	0	0	0	0	0	0	0				
OTHER	0	0	0	0	0	0	0				
RECONDITIONED CAST IRON	0	0	0	0	0	0	0				
TOTAL	0	28.211	3.579	5.655	0	0	37.445				
Describe Other Material:											
3.NUMBER OF SERVICES IN SYSTEM AT END OF YEAR											
					AVERAGE SERVICE LENGTH: 92.33						
MATERIAL	UNKNOWN	1" OR LESS	OVER 1" THRU 2"	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8"	SYSTEM TOTALS				
STEEL	0	0	0	0	0	0	0				
DUCTILE IRON	0	0	0	0	0	0	0				
COPPER	0	0	0	0	0	0	0				
CAST/WROUGHT IRON	0	0	0	0	0	0	0				
PLASTIC PVC	0	0	0	0	0	0	0				
PLASTIC PE	0	1559	0	0	0	0	1559				
PLASTIC ABS	0	0	0	0	0	0	0				
PLASTIC OTHER	0	0	0	0	0	0	0				
OTHER	0	0	0	0	0	0	0				
RECONDITIONED CAST IRON	0	0	0	0	0	0	0				
TOTAL	0	1559	0	0	0	0	1559				
Describe Other Material:											
4.MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION											
	UNKNOWN	PRE-1940	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000-2009	2010-2019	TOTAL

MILES OF MAIN	0	0	0	0	0	0	0	0	0	33.65	3.80	37.45
NUMBER OF SERVICES	0	0	0	0	0	0	0	0	0	1249	310	1559

PART C - TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING THE YEAR

CAUSE OF LEAK	MAINS		SERVICES	
	TOTAL	HAZARDOUS	TOTAL	HAZARDOUS
CORROSION FAILURE	0	0	0	0
NATURAL FORCE DAMAGE	0	0	0	0
EXCAVATION DAMAGE	0	0	4	4
OTHER OUTSIDE FORCE DAMAGE	0	0	0	0
PIPE, WELD OR JOINT FAILURE	0	0	0	0
EQUIPMENT FAILURE	0	0	0	0
INCORRECT OPERATIONS	0	0	0	0
OTHER CAUSE	0	0	0	0

NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR : 0

PART D - EXCAVATION DAMAGE

PART E-EXCESS FLOW VALUE(EFV) DATA

1. TOTAL NUMBER OF EXCAVATION DAMAGES BY APPARENT ROOT CAUSE: 4

NUMBER OF EFV'S INSTALLED THIS CALENDER YEAR ON SINGLE FAMILY RESIDENTIAL SERVICES: 18

- a. One-Call Notification Practices Not Sufficient: 4
- b. Locating Practices Not Sufficient: _____
- c. Excavation Practices Not Sufficient: _____
- d. Other: _____

ESTIMATED NUMBER OF EFV'S IN THE SYSTEM AT THE END OF YEAR: 239

2. NUMBER OF EXCAVATION TICKETS : 261

PART F - LEAKS ON FEDERAL LAND

PART G-PERCENT OF UNACCOUNTED FOR GAS

TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED TO REPAIR: 0

UNACCOUNTED FOR GAS AS A PERCENT OF TOTAL INPUT FOR THE 12 MONTHS ENDING JUNE 30 OF THE REPORTING YEAR.

INPUT FOR YEAR ENDING 6/30: 1.6%

PART H - ADDITIONAL INFORMATION

PART I - PREPARER

Michael Lamond, operator (Preparer's Name and Title)	<u>(209) 772-3006</u> (Area Code and Telephone Number)
mike@alpinenaturalgas.com (Preparer's email address)	<u>(209) 772-3008</u> (Area Code and Facsimile Number)



Procedural Manual for Operations, Maintenance and Emergencies

Integrity Management	Approval Date 3/2/2012
Revision date: 4/01/13	Supercedes: 3/2/2012

ALPINE NATURAL GAS

Appendix R-5

ANNUAL LOG FOR I.M. PERFORMANCE MEASUREMMENT DATA

YEAR OF DATA	# HAZARDOUS LEAKS		# LEAKS CAUSED BY EXCAVATION		# of Excavation Tickets	# of Leaks Repaired	# of Hazardous Repaired		SUMMARY OF MODIFICATIONS to Alpine's Leak Management Plan	Performance Data Evaluated by
							Steel	P.E		
DATE EVALUATED	Service Lines	Main Line	USA ticket	No USA Ticket	Total #					
2016										
2-1-2017	4	0	None	4		4	0	4	Policies Modified or Created: No Any additional Measures needed to 6 in 2015 No ↓ 4 in 2016 Are Performance Measurements Effective? All four Exc. in 2016 By Contractors 3 of 4 from outside area (country)	M Lamond
Comments:										



Procedural Manual for Operations, Maintenance and Emergencies

Integrity Management	Approval Date 3/2/2012
Revision date: 4/01/13	Supercedes: 3/2/2012

ALPINE NATURAL GAS

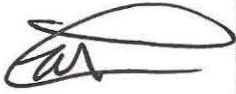
Appendix R-4

MECHANICAL FITTING FAILURE LOG

“Mechanical fitting” means a mechanical device used to connect sections of pipe. The term Mechanical fitting” applies only to:

- a. Stab Type fittings (e.g. Elster Permasert, Constab type couplers);
- b. Nut Follower Type;
- c. Bolted Type fittings;
- d. Other Compression Type fittings.

If, this failure caused a “Hazardous (Class 1) Leak” then a PHMSA FORM 7100.1-2 MUST ALSO BE COMPLETED FOR EACH FAILURE AND REPORTED AND REPORTED BY MARCH 15 OF THE FOLLOWING CALENDAR YEAR. (Form 7100.1-2 is not required if there were no leaks during the reporting year)

<u>DATE FAILED</u>	<u>DESCRIPTION OF MECHANICAL FITTING</u>	<u>SUMMARY OF FAILURE</u>	<u>INVESTIGATED BY</u>
2018	None	No PHMSA 7100.1-2 Report	

None Reported 2016

CALIFORNIA PUBLIC UTILITIES COMMISSION

Report of Gas Leak or Interruption*

CPUC File No. 420 INITIAL

Part I: CPUC CONTACT INFORMATION

Operator: _____ CPUC Contact: Name _____ Recorder FAX
Contact Person _____ Date _____ Time: (24hr) _____
CPUC Information Request: Written Report Sketch/Photo FD Report
Phone: _____ DOT Notified - Yes No DOT Report Number: _____

Part II: INCIDENT DETAILS

Incident Location Incident Time Reported to the Operator
City/County: _____ Date _____ Time: (24hr) _____
Address/Location: _____ Time: (24hr) _____ Reported by: _____

Reason(s) for Reporting (check all that apply)

Gas leak associated with: Emergency action required:
Death PA OP Condition Media Coverage Traffic Rerouted Area Blocked Off Building Evacuated
Injury \$\$Damage UP Condition
Service Interruption Operator Judgment Other Emergency actions (describe) _____
Transmission Line Test Failure Required Transmission Line Shutdown Release of Gas > 3 MMCF

Incident Cause Dig In Fire/Explosion Construction Defect Material Failure Corrosion Vehicle Impact Suicide
UNKNOWN - MORE INFORMATION TO FOLLOW Other (describe) _____

Escaping Gas Involvement (check all that apply) Leak Only Fire Explosion None

Gas Equipment Affected (check all that apply)

Specification of Failed Equipment

Injuries and Fatalities

Main Regulator Meter Valve Material Steel Cast Iron None
Service Line Controls Service Riser Plastic Copper Injuries _____ Fatalities _____
Customer Facility Transmission Line Other Company: () ()
Other (describe) _____ Pipe Size _in _____ Operating _____ Other: () ()
MAOP ___psig _____ Pressure ___psig _____

Dig In Information

Estimated Damage

USA notification required: Yes No Name of Excavator: _____ Damage to gas facilities: \$()
USA notified: Yes No Excavator Contact Person: _____ Other damage involving gas: \$()
Facilities properly marked: Yes No Phone: _____ Total: \$()

Recovery from Incident

Public Agencies on Scene

Customer Outage

Co Personnel on Scene () () Media Police Customers out of service ()
Gas flow stopped () () Fire Ambulance Customer-hours outage ()
Service restored () () Service will be restored upon completion of repairs and at the request of the customer

Part III: CPUC INVESTIGATION

Is further investigation warranted? Yes No Signature of CPUC Engineer _____
Date incident investigated: _____ Field report attached? Yes No CPUC Inspector: _____

Alpine Natural Gas
15 St. Andrews Rd. Ste. # 7
P.O. Box 550

* The information contained in this report is provided solely for the confidential use of the Commission and its staff and is not open to public inspection (PUC GO 66-C, Public Utilities Code, Sections 315 and 583)



ALPINE NATURAL GAS

Procedural Manual for Operations, Maintenance and Emergencies

Form 615-4	Approval Date: 07/15/04
Revision date: 12/21/16	Supercedes: None

Emergency Response Agency Liaison Record

DATE	ATTENDEE NAME (PLEASE PRINT)	ATTENDEE SIGNATURE	ADDRESS	PHONE NUMBER	COMPANY/GROUP REPRESENTED
12-22	RYAN L. HAMRE		6501 JENNY LIND ROAD VALLEY SPRINGS, CA 95252	(209) 217-6491	CALAVERAS CONSOLIDATED FPD
12-22	Mike hamre			772-3006	Alpine Natural Gas
12-22	WADE WHITNEY	W. Whitney	1045 JEFF TUTTLE DR. SAN ANTONIO, CA	754-2897	Calaveras S/O DES
12-22	Luke Frey			772-3006	alpine Natural gas
12-22	Matt Helm	Matt Helm	Headed meeting	772-3006	Alpine Natural gas
		Public Works	was invited to conf-meet but was not present		



www.calcofire.org

CALAVERAS CONSOLIDATED FIRE

RYAN HAMRE
Fire Marshal
6501 Jenny Lind Road
Valley Springs, CA 95252
Office (209) 786-2227
Fax (209) 920-4306
rhamre@calcofire.org

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission's Own Motion to Adopt New
Safety and Reliability Regulations for Natural
Gas Transmission and Distribution Pipelines
and Related Ratemaking Mechanisms.

Rulemaking 11-02-019
(Filed February 24, 2011)

NATURAL GAS SYSTEM OPERATOR SAFETY PLAN
OF ALPINE NATURAL GAS OPERATING COMPANY NO.1, LLC (909G)

Michael Lamond, COO
Alpine Natural Gas Operating Company No. 1, LLC
15 St. Andrews Rd. Suite 7
P.O. Box 550 Valley Springs, CA 95252
Telephone: (209) 772-3006 Facsimile: (209) 772-3008
Email: anginc@goldrush.com

Dated: June 28, 2013

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission's Own Motion to Adopt New
Safety and Reliability Regulations for Natural
Gas Transmission and Distribution Pipelines
and Related Ratemaking Mechanisms.

Rulemaking 11-02-019
(Filed February 24, 2011)

NATURAL GAS SYSTEM OPERATOR
CALIFORNIA SAFETY PLAN OF ALPINE
NATURAL GAS OPERATING COMPANY NO. 1,
LLC (909G)

In accordance with Ordering Paragraph 5 of Decision 12-04-020 of the California Public Utilities Commission (Commission) and Section 961(b) of the California Public Utilities Code, Alpine Natural Gas Operating Company No. 1, LLC (Alpine) submits its Natural Gas System Operator Revised California Safety Plan (Safety Plan).

I. INTRODUCTION

1. Alpine Natural Gas Operating Company No.1, LLC (ANG) respectfully submits to the California Public Utilities Commission (Commission) its Revised CA Safety Plan (Safety Plan) in compliance with the Decision Amending Scope of Rulemaking 11-02-019 and Adding Respondents, dated April 20, 2012 (D.12-04-010).

2. In February 2011, the Commission opened Rulemaking 11-02-019 to coordinate pipeline safety efforts, obtain public input, and propose any necessary rule and/or policy changes.¹

3. In October 2011, the California Legislature passed Senate Bill (SB) 705, which was subsequently codified as Sections 961 and 963 of the California Public Utilities Code. The regulations require, among other things, that each gas corporation operating in California develop a plan for the “safe and reliable operation of its commission-regulated gas pipeline facilities subject to approval, modification and adequate funding by the commission.”

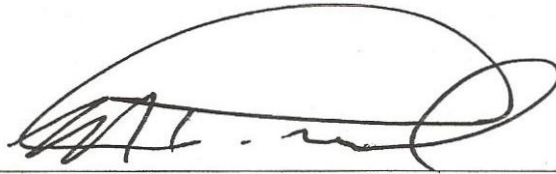
¹D.12-04-010. at p.8-9.

The Commission must review and accept, modify or reject each utility's plan by December 31, 2012.³

4. In D.12-04-010, the Commission addressed the requirements of Public Utilities Code §§961 and 963 by requiring all California gas system operators to file a safety plan no later than June 29, 2012. Through the safety plans, operators must demonstrate how they address each element of Public Utilities Code §§961 and 963.⁴

5. Attached hereto and incorporated herein is Alpine Natural Gas Operating Company No. 1, LLC Revised CA Safety Plan. Included in the Plan document and in compliance with Ordering Paragraph 3(OP) of Commission Decision 12-12-009 is the letter confirming review by the staff of the Gas Safety and Reliability Branch (GSRB), Gas Engineering and Compliance Section (GECS) authorizing ANG to file its Revised CA Safety Plan. Also attached is a separate Table of Alpine Natural Gas' Safety Plan Changes Summary.

Respectfully submitted June 28, 2013 at Valley Springs, California.



Michael Lamond, COO
Alpine Natural Gas Operating Company No. 1, LLC
15 St. Andrews Rd. Suite 7
P.O. Box 550 Valley Springs, CA 95252
Telephone: (209) 772-3006 Facsimile: (209) 772-3008
Email: anginc@goldrush.com

² Public. Util. Code §961(b)(1); Id. at §961(b)(2).

³ ANG initially submitted the required Safety Plan in June 29, 2012; CPUC staff subsequently required revisions to the original submittal and the Safety Plan attached hereto, as revised, has been deemed by Commission staff to be compliant with relevant Commission orders.

⁴ D.12-04-010 at p. 17.



**ALPINE NATURAL GAS
OPERATING COMPANY NO. ONE, LLC**

NATURAL GAS SYSTEM OPERATOR

SAFETY PLAN

Plan Effective Date

June 29, 2012

Revision Date

June 24, 2013

ALPINE NATURAL GAS OPERATING COMPANY NO. 1, LLC (ANG)

SAFETY PLAN

I. PURPOSE AND SCOPE 3

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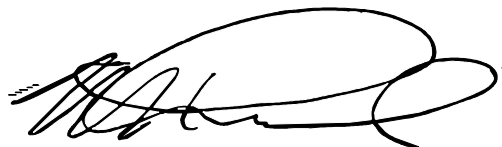
VIII. APPENDICES OF REFERENCE PLANS (A-E).....29

ANG SAFETY PLAN

I. PURPOSE

A. OUR COMMITMENT TO SAFETY

1. ANG management is committed to maintaining a safe and reliable natural gas distribution system for our; customers and their property, employees and the public. Michael Lamond, Chief Operating Officer (COO) has clearly stated in Alpine's Operations and Equipment Manual (OME), in the section "General" and Employee Safety Manual (ESM) along with this document that safety is the top priority of ANG.
2. We continuously strive to improve our operations by acquiring new technology and equipment and through continuous employee training.
3. In order to protect people and property, ANG is proactive in identifying and resolving potential problems before they occur. The reliability of our distribution systems is ensured through proper design, safe construction practices, integrity management programs, routine patrolling, inspection, maintenance, and through improvement projects.
4. We have developed this Safety Plan to help communicate how our various operations policies and procedures support our commitment to safety. The continued commitment to safety depends not only on knowledge, skills and work performance, but on the identification of potential issues and the swift and specific reaction to any emergency situation that may arise.
5. We are proud of our safe operating history. We continue to strive to maintain this history that does not include gas emergencies that have resulted in injuries or loss of life.



B. REGULATION REQUIREMENTS

1. ANG's Safety Plan (Plan) was prepared in order to comply with the California Public Utility Commission (CPUC) requirements as set forth in R.11-02-019 and the mandates of Senate Bill (SB) 705 as codified in the California Public Utilities Code Sections 961 and 963:
 - a. The Company shall implement and utilize its Plan upon CPUC approval. The Plan will clearly document and define Company policies and procedures related to the Commissions five topics identified in 11-02-019 section 2.6 as:

Safety Systems {CA Public Utilities Code § 961(d)(1)(2)} are those policies and procedures that identify and minimize hazard and system risk.

Emergency Response {CA Public Utilities Code § 961(d)(5)(6)(8)} are those policies and procedures that limit the damage from accidents, provide for timely response to reports of leaks, hazardous conditions, and emergency events and prepare for and respond to earthquakes and other major events.

State and Federal Regulations {CA Public Utilities Code §961(d)(7)(9),(c)} establish a minimum baseline for pipeline safety in the United States.

Continuing Operations {CA Public Utilities Code §961(b)(3),(d)(3)(4)(10)} are those that ensure the safety of the public and Company employees, provide for transportation capacity to safely and reliably deliver gas to all customers, provide for effective patrol and inspection to detect leaks, and to ensure an adequately sized, qualified and properly trained Company workforce.

Emerging Industry Issues {CA Public Utilities Code § 961 (d)(11)} are any additional matters that the CPUC or Company determines should be included in this Plan.
 - b. The Company shall periodically review and update the Plan. Alpine will review and or revise the plan annually not to exceed 15 months.
 - c. The Plan shall be consistent with federal pipeline safety statutes as set forth in Chapter 601 of Subtitle VIII of Title 49 of the United States Code and the regulations and the best practices in the natural gas industry.

DOT CFR 49 changes PHMSA Bulletins are received and reviewed by the COO for the purpose of updating where appropriate this safety plan.

- d. The Plan shall set forth how the Company will implement the Plan.
- e. The Company shall provide opportunities for ongoing participation by the Company's workforce in the development and implementation of the Plan, with the objective of creating a culture of safety within the Company and to minimize the potential for accidents, explosions, fires, and dangerous conditions.

The safety plan was developed by the small workforce of Alpine that consists of Michael Lamond, two Qualified Pipeline Operators and two part time customer service employees. The plan was developed, discussed and implemented during periodic staff meetings. The plan development continues to be an ongoing topic until the final approval at which time the annual review will provide staff to participate in plan improvements and or revisions.

- 2. ANG's original system design was performed and installed by qualified pipeline experts in 1999-2000. Subsequent facility installation and operations are performed by Qualified Operators with industry "Best Practices" as guidance. Alpine's ongoing training and implementation of operations policies are guided by various industry organizations including; American Public Gas Association, Midwest Energy Association, Common Ground Alliance as well as guidance bulletins from DOT-PHMSA and the CPUC.

ANG's system Administrator is charged with the ongoing monitoring of regulatory changes. In addition, the Administrator's commitment to quality improvement and safety is demonstrated by continuous evaluation of company procedures and operational performance.

Periodic meetings and discussions are conducted by the Alpine workforce to continually improve operations and procedures. ANG's core belief is that regulatory compliance and operational improvements leads the company to achieve its goal to provide a safe reliable natural gas distribution system.

C. OBJECTIVES

The Company will implement its Safety Plan to comply with elements of R. 11-02-019

1. **{CA Public Utilities Code § 961(d) (1)}**

Protect people and property by identifying and minimizing hazards and risks in order to minimize the likelihood of accidents, explosions, fires, and dangerous conditions.

Alpine's Distribution Integrity Management Plan (DIMP) addressed the identifying of risks and hazards. To summarize; the greatest threat or hazard to Alpines System is a Leak on the system that could lead to accidental ignition (DIMP: Chapters 5, Risk Assessment and & 6, Measures to Address Risk).

Alpine employees are trained and responsible for the safety practices outline in ANG's Employee Safety Manual. OQ employees are able to perform operational tasks by understanding the Safety Manual, the DIMP plan and the specific knowledge of Alpine's OME procedures to operate a safe reliable distribution system. Also mastery of the covered tasks in the OQ plan (see OQ plan, Attachment A-2 "Covered Tasks and Identified Abnormal Operating Conditions"(AOC's)), provides the expertise necessary to perform the tasks safely and appropriately.

The primary procedure to protect people and property is through Alpines Public Awareness Plan, OME procedure 614. The Plans four objectives are:

- a. To educate gas customers and non-gas customers living and or working near Alpine Natural Gas distribution system to recognize the odor of natural gas and how to react if they believe there is a natural gas leak.
- b. To increase the awareness of the affected public and key stakeholders in the Alpine distribution service area of the presence of buried natural gas facilities.
- c. To assist excavators in understanding the measures to be taken to avoid third party damage to buried natural gas facilities and how to respond properly if they cause damage to Alpine Natural Gas facilities.
- d. To assist Fire, Police and other emergency response agencies that may assist Alpine Natural Gas during a natural gas emergency, of the proper actions(s) to be taken in response to a release of natural gas or other natural gas emergency.

Alpine's customer service procedures provide communication regarding important natural gas and natural gas emergencies information (OME Appendix A-3, & E) to all new customers. In addition, this information is provided bi-annually to all customers and annually to non-customers within Alpine's distribution area.

Additional processes in place to minimize this hazard are described in Alpine's OME, DIMP, Damage Prevention Plan (PAP, 614 & 614-B) Appendix B-7 & C-1, Emergency Plan (EP, 615) and the Operator Qualification Plan (OQ). Specific prevention processes include; Leak Survey OME 723, Cathodic Protection (OME Sections; 465,455,481,487-B, 475 & 475B), Valve

maintenance (OME Sections; 747, 747-B, 201 & 365) and locating and marking pipeline (OME Sections; 707, 321-E & 614-C).

Additional OME procedures to protect people and property include; Customer Service procedures OME Appendix A-1, E, OME Section 605-B-11, Leak Investigation 615-A, Leak Testing at Operating Pressure 503, System Patrolling 721, Public Awareness Plan OME 616, Damage Prevention Plan 614-A & 614-B, Continuing Surveillance 613, Odorization 625 and Safety Related Conditions Reporting 605-D.

2. ***{CA Public Utilities Code § 961(d) (2)}***

Identify and implement improvements to pipeline safety systems that may be deployed to minimize hazards, including adequate documentation of gas pipeline facility history and capability.

Alpine's DIMP plan(Chapter 3) and construction records (Service Line Construction and or Main Line Construction Records or similar, OME Section 303) provide the historical as well as new installation data necessary that may be needed to implement future improvements considered as a result of periodic performance review of plans and operations (OME Sections General, General 5 & System Design 619-621 .

New technology and training are considered and added to Alpine's operation where appropriate as part of managements OME, DIMP, and OQ Plan periodic review.

3. ***{CA Public Utilities Code § 961(d) (3)}***

Provide adequate transportation and storage capacity to reliably and safely deliver gas to all customers consistent with rules authorized by the CPUC governing core and noncore reliability and curtailment, including provisions for expansion, replacement, preventative maintenance, and reactive maintenance and repair of gas piping facilities.

Alpine receives its gas supply via a gas transportation agreement with PG&E. Alpine does not store gas only provides to its customers via its distribution system. Ongoing monitoring of regulator station pressure as well as periodic measurement of pressure at the systems terminal end help insure adequate operating pressures throughout (OME Sections General, 739-A, 741,509 & 201).

It is management's responsibility to respond immediately to all scenarios either catastrophic or non-catastrophic, that would negatively impact the

integrity and reliability of the system. Management actively works with its gas suppliers and agents to restore any major disruption in gas flow. OME procedures including the Emergency Plan 615, Record Keeping 709 provide the processes that help assure system integrity and proper operating pressures.

Alpine's distribution system's Regulator Station allows for manual by-pass of the Regulator Station so as to not interrupt service to customers, "Manual Valve Operation- Regulator By-Pass OME 201. In addition the system has multiple main line valves that allow specific isolation of gas delivery to a particular location during Valve maintenance OME 747 or Emergency Plan 615.

4. ***{CA Public Utilities Code § 961(d) (4)}***

Perform effective patrols and inspections of gas pipeline facilities to detect leaks and other compromised facility conditions and make timely repairs.

Alpine's DIMP, OQ, OME including Valve Maintenance 747-B and 365, Regulator Station Inspection and Maintenance 739-A, 739- B, 739-C, 741 & 465 as well as Leak surveys 723, Inside Gas Leaks 615-A, Continuing Surveillance 613 & System Patrolling 721 all are ongoing processes that assist Alpine in identifying Abnormal Operating Conditions (AOC, see OQ Plan) and provide a road map to remedial activities.

5. ***{CA Public Utilities Code § 961(d) (5)}***

Provide appropriate and effective system controls, with respect to both equipment and personnel procedures, to limit the likelihood of damage from accidents, explosions, fires, and dangerous conditions.

System Design specifies appropriate MAOP (OME Section Design Construction MAOP 619-621) & OME Section "General" provides a system summary. Ongoing monitoring of this pressure assures effective control Form 739-A & 741. Future expansion considerations must always address the design criteria of the system and it's MAOP.

System control added after initial design and construction were the use of excess flow valves on all service lines installed after February 2010 (Excess Flow Valves OME Sections 381-383. Also, the installation of an additional Regulator Station, carbon steel ball Valve, located on the outlet side of the Regulator Station, to assist and improve our "Lock Up" Procedure. These are examples of an improvement that

would serve to limit damages from an abnormal condition such as exceeding MAOP, as a result of operations.

Leak Survey Procedure 723 utilizes the GPTC Leak Classification system as a guideline, generally though all leaks are at time of discovery repaired, however, if the Leak Classification allows for a repair to be scheduled at a later date the operator may defer the repair according to the procedure Leak Survey 723.

Alpine's Emergency Plan (OME Section 615) provides the procedures to be followed in the event of an emergency that would affect control of the system.

6. **{CA Public Utilities Code § 961(d) (6)}**

Provide timely response to customer and employee reports of leaks or abnormal operating conditions and emergency events.

Alpines OME procedures outline Alpine's quick response to all leak or odor calls immediately upon report Customer Service 605-B-11, Inside Gas Leaks 615-A, Appendix B-2, A-3 & E. Damage Prevention 614-a & 614-B, Valve Opening and Closing 747 & 365 Additionally, the quick repair of any leak or odor detected during investigation (Leak Investigation OME Section 617 and Joining of Threaded Pipe OME Section 273) we believe only enhances ANG's ability to maintain a safe reliable distribution system.

ANG's Leak reports are reviewed and had been determined to historically be minimal, however by category the primary types are excavation and threaded pipe leaks on homeowners own piping.

- a) The process of promoting our Preventative Awareness Plan (PAP) has improved Damage Prevention and subsequently we see a decrease in leaks caused by excavation activities.
- b) In an effort to assure safety and provide convenience for our customer's, leaks found on a customer's own pipe, ANG developed an alternative to red-tagging the meter and shutting off the gas until the customer makes the necessary repairs. The customer has an opportunity to request in writing that ANG make the repairs that correct the leak on a customers threaded pipe OME Section 273. ANG believes, by augmenting the repair process, their customer's communication of potential gas leaks is improved.

Annual Review of Leak Data and Reporting see Integrity Management Plan OME Section 1005 allows management to monitor trends and areas in need of improvement regarding incidence of gas leak reporting.

7. **{CA Public Utilities Code § 961(d) (7)}**

Include appropriate protocols for determining maximum allowable operating pressures for pipeline segments.

Alpine's distribution system is controlled by a single regulator station. The only steel in the system is in the Regulator Station and the two feet of steel pipe where it exits the underground vault. Under Federal Regulation 49 CFR § 192 the MAOP was designed at 60 psig. All main line pipe downstream, approximately 34 miles, is of Polyethylene Pipe (P.E.). The largest main is 6" in diameter. Alpine's normal operating pressure of the distribution system is currently 45 psig.

Alpine records and maintains all documents (Record Keeping OME Section 709). Hard copy retention of all pressure recordings and inspections provide for the continuous monitoring of the gas systems OME Section, MAOP 619-621 and ongoing Maintenance OME procedures (such as; Regulator Station Pressures and Operation 739-A, 739-B, 739-C, 741, Cathodic Protection 465, Leak Survey 723, System Patrolling 721 and Line Markers 707).

This documented history and our Operator Qualification Plan provides evidence of a safe reliable distribution system.

8. **{CA Public Utilities Code § 961(d) (8)}**

Prepare for and respond to earthquakes and other major events to minimize damage.

Alpine's various plans OME (including Leak Survey Section 723), PAP, OQ, and Emergency Plan OME Section 615 contain procedures that provide for; the ongoing monitoring, response to and subsequent remediation or repairs required for any event that impacts or potentially impacts Alpine's distribution system.

Key components of Alpine's Emergency Plan (OME 615) include:

- Receiving, Identifying and Classifying Emergency Notices
- A potential versus an Actual Emergency Notice
- Instructions to Callers
- Prompt and Effective Response by Alpine's workforce
- Notifying Fire, Law Enforcement and other Public Officials
- Reporting Requirements
- Minor Gas leak Field Response
- Major Gas Leak Field Response

Leaks Inside Buildings
Fires/Explosions
Media Notification/Inquiries
Natural Disasters, Earthquake, Wildfire
Gathering Emergency Data
Post-Emergency Review
Annual Plan Review & Employee Training

9. **{CA Public Utilities Code § 961(d) (9)}**

Meet or exceed the minimum standards for safe design, construction, installation, operation, and maintenance of gas transmission and distribution facilities prescribed by regulations issued by the United States Department of Transportation in Part 192 (commencing with Section 192.1) of Title 49 of the Code of Federal Regulations as well as the CPUC Safety Division.

The DIMP plan addressed the design and ongoing monitoring of the distribution system the following OME Sections pertain to compliance with this regulation:

Safe Design: Design-Constr. MAOP, General

Construction: 303

Installation: Customer Meters; 355, 357, 359, P.E. Pipe 319-321, Pipe Joining 281-285, Tapping Pipelines Under Pressure 627

Operations & Maintenance: Repair of Damaged Pipeline 703, Prevention of Accidental Ignition 751, System Patrolling 721, Leak Test 503, Pipe Squeeze Off 605-B, Pipeline Repair 605-B-1, PAP 616, Leak Survey 723, Pipeline Locating 321-E & 614-C, Integrity Management Plan OME 1005 including Appendix R-4, R-5 & R-6.

This includes ANG's compliance with new and future recommendations from the CPUC via G.O. 112-E Safety Audits.

10. **{CA Public Utilities Code § 961(d) (10)}**

Ensure an adequately sized, qualified, and properly trained gas corporation workforce to carry out the Plan.

Federal Regulation 49 CFR Subpart N requires an Operator Qualification Plan. The OQ Plan requires ongoing training and periodic skills competency evaluation to provide that the requirements of a Qualified Pipeline Operator under this Sub-part N are met.

OME Review & Revision 605-A-1 and O&M Work Review 605-B-8 gives management opportunity to review size and qualifications of the workforce.

11. **{CA Public Utilities Code § 961(d) (11)}**

Include any additional matters that the CPUC determines should be included in the Plan.

New Regulatory matters and or issues are reviewed by management in a timely fashion and then communicated to staff. Any operational changes required are then developed and implemented see (OME Section “General”).

12. **{CA Public Utilities Code § 963(b) (3)} and § 961(c) & (e)**

Place safety of the public and employees as the top priority; take all reasonable and appropriate actions consistent with the principle of just and reasonable cost-based rates.

Employees are expected to work according to the guidelines for safety as put forth in all plans and manuals including the Employee Safety Manual. Employees participated in the Safety Plan development as well as all others. Periodic Staff meetings provide a forum where operations are actively discussed and revisions or changes are developed. See Integrity Management Plan OME Section 1005.

Safety concerns (Safety Related Conditions/Reporting OME Section 605-D) that employees have for either themselves, fellow workers, customers or the public can be communicated either in the Staff meeting forum or privately without fear of reprisal from management see (DIMP Chapter “General”).

Industry Best Practices are adhered to during operations and training. PHMSA guidelines and other regulatory guidelines are reviewed and changes to operations are developed and implemented as appropriate. Employees and Administrator actively evaluate operations to strive for continuous improvement and achieve goal of running a safe reliable natural gas distribution company.

D. APPLICABILITY, IMPLEMENTATION AND REVISION

1. This Plan applies to all Company and contractor personnel who perform covered tasks. This includes, but is not limited to field employees, field supervision, and contractors.
2. ANG’s Plan will be effective upon CPUC approval. Implementation of the Plan is through application of reference documents which address all of the elements set forth in the regulation. Initial implementation will occur through specific overview training with all affected personnel identified in the Plan. Training will be documented in accordance with DOT and CPUC guidelines. Annual review of the Plan will involve Company management and affected covered employees. Each new employee will receive training on the purpose, scope and detailed policies and procedures contained in the ANG Plan.
3. The Plan references other existing Company policies, procedures, programs and

plans. These referenced documents are reviewed annually and updated as needed. The Plan will be reviewed annually in conjunction with these referenced documents. In addition, the Plan will be revised based upon changes to regulatory requirements, policies or procedural changes, editorial changes or as determined by the Company.

II. PLAN PROVISIONS

ANG Manual/Program/Plan	CA Public Utilities Code	R.11-02-019 Topic
Operations Manual (OME) Employee Safety Manual(ESM)	<i>CA Public Utilities Code § 961(d)(1)-(9), § 963(b)(3)</i>	Safety Systems Emergency Response State and Federal Regulations Continuing Operations
Distribution Integrity Management Program (DIMP) & See OME 1005	<i>CA Public Utilities Code § 961(d)(1)(2)(9), § 963(b)(3)</i>	Safety Systems State and Federal Regulations Continuing Operations
Damage Prevention Program (DPP) See OME- Section 614	<i>CA Public Utilities Code § 961(c), (d)(1)(2)(9)</i>	Safety Systems State and Federal Regulations
Public Awareness Program (PAP) See OME- Section 616	<i>CA Public Utilities Code § 961(d)(1)(2)(5)(9)</i>	Safety Systems Emergency Response State and Federal Regulations
Emergency Plan (EPM) See OME- Section 615	<i>CA Public Utilities Code § 961(d)(2)(5)(6)(8)(9)</i>	Safety Systems Emergency Response State and Federal Regulations
Operator Qualification Plan (OQ)	<i>CA Public Utilities Code § 961(c),(d)(10)</i>	State and Federal Regulations Continuing Operations
Drug and Alcohol Plan (D&A)	<i>CA Public Utilities Code § 961(c),(d)(10)</i>	State and Federal Regulations Continuing

The ANG Safety Plan embodies the policies and procedures specified in ANG’s manuals, plans and programs listed above and references CA PUC code section to these plans in the Table. Additionally, the specific provisions of the Plan are cross referenced to the Alpine OME procedure number to illustrate compliance to each CA PUC Code section in the Table below:

<u>PUC Code Section</u>	<u>Operations, Maintenance and Emergencies (OME) Description</u>	<u>Procedure Section #</u>	<u>Additional Plans that address compliance</u>
§ 961(b)(3)	Integrity Management Plan Safety Related Conditions/Reporting	1005 General 605-D	Safety Plan, Employee Safety Manual (ESM) Operator Qualification Plan (OQ), Safety Injury Prevention Plan, Drug & Alcohol Plan
§ 961(b)(4)			Safety Plan ESM
§ 961(c)	Damage Prevention Plan	614-A&B	Safety Plan OQ Plan Drug & Alcohol Plan
§ 961(d)(1)	Customer Service Customer Service Odor & Leak Calls Leak Investigation	Appendices A1, A3 & E 605-B-11 615-A	DIMP QQ Plan

	Leak Test at Operating Pressure Leak Survey System Patrolling Public Awareness Plan Damage Prevention Plan Cathodic Protection Valve Maintenance Squeeze off Plastic Pipe Line Markers Continuing Surveillance Odorization Safety Related Conditions/Reporting Locating Underground Pipeline	503 723 721 616 614-A & 614-B 465, 455, 481,487-B, 475 & B 747, 747-B, 201 & 365 605-B 707 613 625 605-D 321-E & 614-C	
§ 961(d)(2)	System Summary Determination of Class Design-Constr. MAOP Construction, pre-tested pipe	General General 5 619-621 303	DIMP
§ 961(d)(3)	System Summary Regulator Station Maintenance Record Keeping	General 739A, 741, 509 & 201 709	DIMP
§ 961(d)(4)	Regulator Station Maintenance Valve Maintenance Leak Surveys Continuing Surveillance System Patrolling	739 A-C, 741, 465 747-B & 365 723 613 721	DIMP
§ 961(d)(5)	MAOP Excess Flow Valves System Summary	619-621 381-383 General	DIMP
§ 961(d)(6)	Damage Prevention Customer Service Joining of Threaded pipe Investigation of Failures	614-A&B 605-B-11 App. A1, A3 & E 273 617	DIMP
§ 961(d)(7)	Record Keeping Regulator Station Maintenance MAOP	709 739 A-C, 741, 465 619-621	DIMP
§ 961(d)(8)	Emergency Plan	615	DIMP
§ 961(d)(9)	Installation of Customer Meters Installation of P.E. Pipe Pipe Joining Procedures Tapping Pipelines under Pressure Repair of Damage Pipeline Prevention of Accidental Ignition System Patrolling Leak Test Pipe Squeeze off Pipeline Repair Public Awareness Plan Leak Survey Pipeline Locating	355, 357 & 359 319-21 281-285 627 703 751 721 503 605-B 605-B-1 616 723 321-E & 614-C	DIMP OQ Plan
§ 961(d)(10)	OME Review & Revision O&M Work Review General	605-A-1 605-B8	Safety Plan
§ 961(d)(11)	System Summary	General	DIMP
§ 961(e)	System Summary Integrity Management Plan Safety Related Conditions/Reporting	General 1005 General 605-D	ALL

A. OPERATIONS MAINTENANCE AND EMERGENCIES (OME) MANUAL

1. ANG's Operations, Maintenance and Emergencies Manual (OME) contains policies and procedures for the operations and maintenance of the

Company's distribution system meeting or exceeding the minimum standards set forth in U.S. Department of Transportation regulation Title 49 CFR Part 192.

2. The Operations Manual contains procedures for leak surveys, leak detection, patrolling requirements, emergency response requirements, identification of abnormal and unusual operating conditions, corrosion control requirements, measurement and control requirements, design standards, and general operational standards for CG's distribution facilities.

OME 614-A, B & C DAMAGE PREVENTION PROGRAM

"Call Before You Dig" USA North "811" call center along with a vigilant program to monitor all excavators is the key to prevent damage to underground distribution facilities. ANG has an aggressive program to monitor all excavations within its service territory and to continuously inform its customers to the dangers of excavating on their property without first utilizing USA North's one call system to request all utilities to line locate underground facilities prior to any excavation.

The Company is committed to designing, constructing, operating, and maintaining its pipelines in a manner that ensures long term safety and product reliability to the public, its customers, contractors, and employees. This includes minimizing service interruptions and negative impacts caused by excavation damage.

OME 616 PUBLIC AWARENESS PROGRAM

The Company developed a Public Awareness Program to comply with the American Petroleum Institute (API) recommended practice RP1162. ANG's Public Awareness Program includes requirements from U.S. Department of Transportation regulation Title 49 CFR Parts 192.605, 192.614, 192.615, and 192.616 to enhance messages, methods, procedures, and documentation.

OME 615 EMERGENCY PLAN

When any emergency arises that affects the normal, safe distribution of gas to customers, it is essential that a predetermined course of action and the means necessary to accomplish these actions be immediately taken to protect customers and their property, employees, contractors, first responders and the public in general. ANG's Emergency Response Plan describes the procedures and

policies for accomplishing these objectives. All personnel are trained, drilled, and critiqued on emergency preparedness in order to maintain effective and timely responses to natural gas related emergencies.

B. DISTRIBUTION INTEGRITY MANAGEMENT PROGRAM

The Company's Distribution Integrity Management Program (DIMP) is based on a risk based process that attempts to identify and prioritize the risks in order to insure the safety and integrity of ANG's distribution systems.

ANG acquired and uses a web based DIMP analysis program called SHRIMP. SHRIMP was developed by the American Public Gas Association predominately for small natural gas distribution entities.

C. OPERATOR QUALIFICATION PLAN

The Operator Qualification (OQ) plan was developed and implemented to comply with U.S. Department of Transportation regulation Title 49 CFR Part 192, Subpart N ± Qualification of Pipeline Personnel. ANG's Operator Qualification plan identifies covered employees and defines covered tasks and the required qualifications for all work that meets the four-part test: (1) The activity is performed on a distribution facility, (2) The activity is an operations or maintenance task, (3) The activity is performed as a requirement of Title 49 CFR Part 192, and (4) The activity affects the operation or integrity of the pipeline. The Company administers the OQ plan for all approved contractors and Company employees that perform work for the Company on its distribution facilities.

D. EMPLOYEE SAFETY MANUAL

The Company maintains a comprehensive employee safety program for covered employees. As part of the program, the Company has developed the Safety Policies and Procedures contained in the Employee Safety Manual (ESM), and has also developed a written Accident Prevention Program (IIPP). These publications outline the safety responsibilities of all employees, including general safety rules and specific safety requirements. All employees are encouraged to read them carefully, become familiar with them and strictly adhere to all safety rules and procedures that apply to their job.

In addition, the Company provides each employee with the proper tools and equipment to do their job safely, as well as personal protective equipment to use without hesitation. The employee safety program meets or exceeds the requirements for occupational safety regulatory compliance.

E. GAS PIPE FUSION MANUAL AND OTHER MATERIAL REFERENCE GUIDES

1. Components of the Gas Pipe Fusion Manual and Reference Guide are included throughout the Operations Manual. This Manual serves as an appendix to ANG's Operations Manual.
2. The Company's Material Specifications denote the requirements that must be met for all natural gas carrying components utilized in ANG's distribution system. These specifications include the material; applicable standards (national, federal or other), terminology, materials and manufacturing standards, material performance requirements, dimensions and tolerances, inspection, certification, Material Safety Data Sheet (MSDS) information, product marking and labeling, packaging, stock classification descriptions, and approved manufacturers or product suppliers.

F. DRUG AND ALCOHOL PLAN

The Company's Drug and Alcohol (D&A) Plan provides policies, procedures, and protocols for drug and alcohol testing of individuals who perform covered tasks including operations, maintenance, or emergency response functions on natural gas facilities. The Company retains an outside testing laboratory that conducts drug tests of all ANG's employees who perform covered tasks.

III. EMPLOYEE SAFETY AND WORK PROCESS

Any employee or contractor who perceives a breach of safety requirements is authorized to stop work immediately and communicate the breach to their management. Additionally, employees are required to report immediately any regulatory violations, suspected regulatory violations, or potentially harmful or dangerous.

Management places Safety as top priority and will take all reasonable and appropriate actions consistent with the principle of just and reasonable cost-based rates see Safety Related Conditions/Reporting OME Section 605-D.

IV. PLAN REVIEW REQUIREMENTS

This Plan will be distributed to all affected personnel via hard copy access. Personnel are encouraged to actively evaluate the effectiveness and provide feedback, where applicable, on all sections of the Plan as well as through regular manual, policy and procedure review processes. Management along

with OQ and Customer Service staff will conduct periodic plan review annually but not to exceed every 15 months.

ALPINE'S ANNUAL SAFETY PLAN REVIEW

Plan Year Reviewed 2016

Date Reviewed 2-1-17

Were there any fires, earthquakes, explosions, floods or other natural or man-made disasters to report? Y/N

Do the policies and procedures adequately address the elements of Alpine's Safety Plan: Y/N

Were there any safety issues that affected the system, the public or employees that required review: Y/N

If Yes please describe: _____

How many safety issues or occurrences in the calendar year: _____

What was the total cost to remediate the safety issues \$ 25,000.00

Does the Administrator determine that the size of the staff is/was adequate: Y/N

Are there training issues to address? Y/N

Is it determined that meaningful ongoing employee participation was provided? Y/N

Notes, comments or suggested revisions:

Reviewed by: Michael Lamond 

Name	Initials	Name	Initials
<u>Julie Perry</u>	<u>JL</u>		
<u>Matt Hill</u>	<u>MH</u>		

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 27, 2013

Subject: Filing of Gas Safety Plans

Dear Mr. Lamond,

The Safety and Enforcement Division, Gas Safety and Reliability Branch (GSRB) has reviewed the revisions made to Alpine Natural Gas Operating Company's (ANG) Safety Plan to resolve all deficiencies per the requirements of Ordering Paragraph 3 (OP.3) of Commission Decision 12-12-009.

Based on its review, GSRB believes the revisions adequately address the deficiencies and that ANG may now file its revised Safety Plan. As a reminder, a separate table summarizing the changes made with the following information must be included in the final filing:

PU Code section	Requirement	GSRB's initial review of Safety Plan if it complies with this Section of the PU Code (Y or N)	GSRB Reviewer's Comments during the initial review	Specific section in the REVISED Safety Plan that addresses revisions made to meet the PU Code Section	Summary of the REVISED Safety Plan that addresses this PU Code Section
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Should you have any questions related to this matter, please contact at Aimee Cauguiran at (415) 703-2055 or by e-mail at (aimee.cauguiran@cpuc.ca.gov).

Sincerely,

Michael Robertson, Program Manager
Gas Safety and Reliability Branch

PU Code Section	Requirement	GECS's Initial Review of Safety Plan if it complies with this section of the PU Code (Y or N)	GSRB Reviewer's Comments to support the "No" conclusions of his/her review	Specific area of Alpine Natural Gas' (ANG) Safety Plan that addresses this PU Code Section	Summary of the Revised Safety Plan that addresses this PU Code Section
<u>Sec. 961 Subdivision (b)</u>					
-3	Each gas corporation shall implement its approved plan	N	The person listed in ANG's plan did not sign.	I.B.1.a & I.A. & I.C.12	ANG's Safety Plan was prepared in order to comply with the CPUC requirements as set forth in R.11-02-09 and mandates of Senate bill (SB) 705 as codified in the CPUC Code Sections 961 and 963. a.) The company shall implement and utilize its plan upon CPUC approval. A signature line was added.
-4	The commission shall require each gas corporation to periodically review and update the plan	N	The safety plan did not specify how often it will be reviewed and updated.	I.B.1.b	The company shall periodically review and update the plan. Added Alpine will review and or revise the plan the plan annually not to exceed 15 months.

PU Code Section	Requirement	GECS's Initial Review of Safety Plan if it complies with this section of the PU Code (Y or N)	GSRB Reviewer's Comments to support the "No" conclusions of his/her review	Specific area of Alpine Natural Gas' (ANG) Safety Plan that addresses this PU Code Section	Summary of the Revised Safety Plan that addresses this PU Code Section
Sec. 961 Subdivision (c)	The plan developed, approved, and implemented pursuant to subdivision (b) shall be consistent with best practices in the gas industry and with federal pipeline safety statutes as set forth in Chapter 601 (commencing with Section 60101) of Subtitle VIII of Title 49 of the United States Code and the regulations adopted by the United States Department of Transportation pursuant to those statutes.	N	Safety Plan did not provide details on the specific process(es).	I.B.1.c	The Plan shall be consistent with federal pipeline safety statutes as set forth in Chapter 601 of Subtitle VIII of Title 49 of the United States Code and the regulations and the best practices in the natural gas industry. DOT CFR 49 changes PHMSA Bulletins are received and reviewed by the COO for the purpose of updating where appropriate this safety plan.
		Y	No issue identified at this time	I.D.3	The plan will be revised based upon changes to regulatory requirements, policies or procedural changes, editorial changes or as determined by the company
Sec. 961 Subdivision (d)					

PU Code Section	Requirement	GECS's Initial Review of Safety Plan if it complies with this section of the PU Code (Y or N)	GSRB Reviewer's Comments to support the "No" conclusions of his/her review	Specific area of Alpine Natural Gas' (ANG) Safety Plan that addresses this PU Code Section	Summary of the Revised Safety Plan that addresses this PU Code Section
-1	Identify and minimize hazards and systemic risks in order to minimize accidents, explosions, fires, and dangerous conditions, and protect the public and the gas corporation workforce.	N	The safety plan did not specify or reference the processes and procedures.	I.C.1	Specifies the specific OME section and discusses the process as to how the PU code is addressed.
-2	Identify the safety-related systems that will be deployed to minimize hazards, including adequate documentation of the commission-regulated gas pipeline facility history and capability.	N	The safety plan did not specify the processes and procedures.	I.C.2	Specifies the specific OME section and discusses the process as to how the PU code is addressed.

PU Code Section	Requirement	GECS's Initial Review of Safety Plan if it complies with this section of the PU Code (Y or N)	GSRB Reviewer's Comments to support the "No" conclusions of his/her review	Specific area of Alpine Natural Gas' (ANG) Safety Plan that addresses this PU Code Section	Summary of the Revised Safety Plan that addresses this PU Code Section
-3	Provide adequate storage and transportation capacity to reliably and safely deliver gas to all customers consistent with rules authorized by the commission governing core and noncore replacement, preventive maintenance, and reactive maintenance and repair of its commission-regulated gas pipeline facility.	N	The safety plan did not describe the process for monitoring to provide the adequate pressure and capacity.	I.C.3	Specifies the specific OME section and discusses the process as to how the PU code is addressed.
-4	Provide for effective patrol and inspection of the commission-regulated gas pipeline facility to detect leaks and other compromised facility conditions and to effect timely repairs.	N	The safety plan did not specify or reference the processes and procedures.	I.C.4	Specifies the specific OME section and discusses the process as to how the PU code is addressed.

PU Code Section	Requirement	GECS's Initial Review of Safety Plan if it complies with this section of the PU Code (Y or N)	GSRB Reviewer's Comments to support the "No" conclusions of his/her review	Specific area of Alpine Natural Gas' (ANG) Safety Plan that addresses this PU Code Section	Summary of the Revised Safety Plan that addresses this PU Code Section
-5	Provide for appropriate and effective system controls, with respect to both equipment and personnel procedures, to limit the damage from accidents, explosions, fires, and dangerous conditions.	N	The safety plan did not describe the process, and specific section of the referenced plans were not stated.	I.C.5 . And II	Specifies the specific OME section and discusses the process as to how the PU code is addressed.
-6	Provide timely response to customer and employee reports of leaks and other hazardous conditions and emergency events, including disconnection, reconnection, and pilot-lighting procedures.	N	The safety plan did not address disconnection, reconnection, and pilot-lighting procedures. Also, the plan did not describe the processes and specific sections of the referenced plans were not stated.	I.C.6	Specifies the specific OME section and discusses the process as to how the PU code is addressed.

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-7	Include appropriate protocols for determining maximum allowable operating pressures on relevant pipeline segments, including all necessary documentation affecting the calculation of maximum allowable operating pressures.	N	The safety plan did not address all necessary documentation affecting the calculation of maximum allowable operating pressures. Also, the plan did not describe the processes for confirming and establishing the MAOP and specific sections of the referenced plans were not stated.	I.C.7	Specifies the specific OME section and discusses the process as to how the PU code is addressed. Alpine's distribution system is controlled by a single regulator station. The only steel in the system is in the Regulator Station and the two feet of steel pipe where it exits the underground vault. Under Federal Regulation 49 CFR § 192 the MAOP was designed at 60 psig. All main line pipe downstream, approximately 34 miles, is of Polyethylene Pipe (P.E.). The largest main is 6" in diameter. Alpine's normal operating pressure of the distribution system is currently 45 psig.
-8	Prepare for, or minimize damage from, and respond to, earthquakes and other major events.	N	The safety plan did not describe the process and specific section of the referenced plans were not stated.	I.C.8	Specifies the specific OME section and discusses the process as to how the PU code is addressed. Key components of the Emergency Plan are listed.

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-9	Meet or exceed the minimum standards for safe design, construction, installation, operation, and maintenance of gas transmission and distribution facilities prescribed by regulations issued by the United States Department of Transportation in Part 192 (commencing with Section 192.1) of Title 49 of the Code of Federal Regulations.	N	The ANG safety plan did not provide a signed statement from a company officer regarding how the operator ensures it meets this requirement.	I.C.9	The DIMP plan addressed the design and ongoing monitoring of the distribution system the following OME Sections pertain to compliance with this regulation: Specifies the specific OME section and discusses the process as to how the PU code is addressed.
-10 and Sec. 963 Subdivision (b)(3)	Ensure an adequately sized, qualified, and properly trained gas corporation workforce to carry out the plan.	N	The ANG safety plan did not provide a signed statement from a company officer regarding how the operator ensures the adequacy of its workforce nor did the safety plan provide any processes or procedures for meeting this requirement.	I.C.10	Specifies the specific OME section and discusses the process as to how the PU code is addressed. OME Review & Revision 605-A-1 and O&M Work Review 605-B-8 gives management opportunity to review size and qualifications of the workforce.

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-11	Any additional matter that the commission determines should be included in the plan.	N	Did not meet criterion	I.C.11	Specifies the specific OME section and discusses the process as to how the PU code is addressed. OME Review & Revision 605-A-1 and O&M Work Review 605-B-8 gives management opportunity to review size and qualifications of the workforce. New Regulatory matters and or issues are reviewed by management in a timely fashion and then communicated to staff. Any operational changes required are then developed and implemented see (OME Section "General").
Section 961 Subdivision (e)	The commission and gas corporation shall provide opportunities for meaningful, substantial, and ongoing participation by the gas corporation workforce in the development and implementation of the plan, with the objective of developing an industry wide culture of safety that will minimize accidents, explosions, fires, and dangerous conditions for the protection of the public and the gas corporation workforce.	N	ANG's Safety Plan did not provide any processes or procedures for complying with this requirement.	I.C.12	Employees participated in the Safety Plan development. Periodic Staff meetings provide a forum where operations are actively discussed and revisions or changes are developed. See Integrity Management Plan OME Section 1005.