



BEFORE THE

**FILED**

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

04-11-11  
04:59 PM

Order Instituting Rulemaking )  
on the Commission's Own Motion )  
to Adopt New Safety and Reliability Regulations ) R. 11-02-019  
for Natural Gas Transmission and Distribution Pipelines )  
and Related Ratemaking Mechanisms. )

**COMMENTS OF THE UTILITY WORKERS UNION OF AMERICA (UWUA),  
LOCALS 132, 483, 522  
Representing Employees at Southern California Gas Company,  
on R.11-02-019, Gas Safety Rulemaking**

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April 11, 2011

**COMMENTS OF THE UTILITY WORKERS UNION OF AMERICA (UWUA),  
LOCALS 132, 483, 522  
Representing Employees at Southern California Gas Company,  
on R.11-02-019, Gas Safety Rulemaking**

On February 24, 2011 the Commission issued its order initiating this rulemaking (February 24 Order) and began a process that promises to transform the approach by California's gas utilities and their employees to providing the public with safe and effective natural gas service.

There are nearly 4400 UWUA members working at Southern California, in Local Unions 132, 483 and 522. UWUA Members (hereafter collectively UWUA) intend to participate vigorously in this proceeding, focusing on issues of system safety and quality of service to the public. In so doing they both represent their interests as residential consumers and carry out the principles of the UWUA Constitution and their local union by-laws:

We are an organization of men and women of every race, religion, age, and ethnicity, who are committed to a society where all workers and their families live and work with dignity; where there is an economic and political mandate for a more equitable distribution of the nation's wealth for all those performing useful service to society; where workers have a collective voice and power at the workplace; where economic well being is achieved for our members and all workers; where work is satisfying and fairly rewarded....

To accomplish these goals we commit to:

...

*Participate in regulatory, legislative, legal and electoral proceedings to protect the interests of consumers and the public (including our members) in reliable, safe and environmentally sound utilities at affordable, just and reasonable costs.* UWUA Constitution, Preamble

In this regard UWUA fully supports the Commission's decision to include both transmission and distribution system safety in this proceeding. The gas delivery system is a seamless network of pipes, devices and people that provides a service deemed essential by California's Constitution and laws. The safe delivery of gas to

customers at their meter and the provision of after-meter services that enable customers to use gas safely in their homes, schools, hospitals and businesses are essential elements of the service that consumers and the public expect.

### **I. Overview**

UWUA supports and advocates the Commission’s call for creation of a system-wide safety culture that provides an opportunity for the represented employees who operate and maintain the system every day to participate fully and pro-actively in the development and implementation of safe practices and procedures for the protection of the public interest. UWUA intends to make California’s statutory three-cornered public interest construct – patrons, employees and the public – meaningful for all stakeholders.<sup>1</sup> UWUA will make proposals to improve system safety and service throughout the industry, identifying both underlying strengths to build on and new programs to improve possible weaknesses. UWUA will make proposals to improve the flow of information both in the proceeding at hand and in ongoing gas system safety procedures within the company and at the Commission. Transparency in system operations and a culture of self-improvement and self-correction that seeks proactively to identify risks and prevent harm before it happens should be the common goal of workers, managers and regulators.

In the February 24 Order the Commission described its objectives in the proceeding:

A. Provide the Public with a means to make their views known to this Commission. (Section 4.)

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<sup>1</sup> Pub. Util. Code section 451 provides in pertinent part:

... Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities, ..., as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.

...

....

C. Develop and adopt safety-related changes to the Commission's regulation of natural gas transmission and distribution pipelines, including requirements for construction, especially shut-off valves, maintenance, inspections, operation, record retention, ratemaking, and the application of penalties. (Section 6.)

D. Consider ways that this Commission can undertake a comprehensive risk assessment for all natural gas pipelines regulated by this Commission, and possibly for other industries that the Commission regulates. (Section 7.)

E. Consider available options for the Commission to better align ratemaking policies, practices, and incentives to elevate safety considerations, and maintain utility management focus on the "nuts and bolts" details of prudent utility operations. (Section 8.)

...

G. Consider if we need further rules or other protection for whistleblowers to inform the Commission of safety hazards. (Section 10.)

In *Part II, Creating and Institutionalizing a Safety Culture*, UWUA will describe its focus on Item C (Order Section 6, changes to the safety regulations that embody a safety culture); Item D (Order Section 7, systemic risk assessment); and Item G (Order Section 10, protection for communications to the Commission), with a comprehensive proposal to map system hazards proactively and develop a plan to eliminate them, or mitigate those that cannot be eliminated. In *Part III, Process*, UWUA will outline a proposal for workshops as the best way to bring to the Commission both its national experience with safety programs and the knowledge and insights of the workers on the SoCal Gas property, Item A ( Order Section 4, public process). UWUA will also suggest an approach to managing the relationship between this proceeding and the SCG General Rate Case, A.10-12-006 consolidated with the GRC of San Diego Gas and Electric, A, 10-12-005, Item E (Order Section 8, aligning ratemaking policies to elevate safety considerations). The Items identified for additional comment by the Assigned Commissioner in Assigned

Commissioner Ruling dated March 24, 2011 (March 24 ACR) will address in Part II.B *Safety Plan* (Items 2.1 and 2.4) and II.C *Transparency Principles* (Items 2.2 and 2.3).

## **II. Creating and Institutionalizing a Safety Culture**

**A. Safety Culture.** The Commission has stated in the February 24 Order that its goal is to establish rules and policies that accord safety of gas utility operations the highest level of priority.

“We must ensure that our gas utilities recognize that mere compliance is not enough. Safe pipeline operations must begin with utility management and the culture it creates in the workrooms and field crews of the utility. The pipeline operators must have a corporate ethic and workplace culture that places safety as their first responsibility.”  
(emphasis added)

For UWUA establishing the elements of an effective safety culture entails a recognition that gas pipelines are essential facilities providing a critical and essential good to the California public. The gas business requires the safe transportation and delivery of a dangerous, combustible substance. Safety for the public and the workers is of paramount importance. From our perspective the safety culture in the gas business entails a philosophy about workplace and public safety where:

- Gas pipelines are essential facilities providing a critical and essential good to the California public. The gas business requires the safe transportation and delivery of a dangerous, combustible substance. Safety for the public and the workers is of paramount importance.
- Unsafe conditions and practices are identified proactively and eliminated or minimized through implementation of a systems approach to safety that engages all employees of the utility including both management and labor. Protecting workers and the public involves every aspect of the Company’s operations, not just pipelines.
- Systems of Safety is not an abstract concept; identifying failed systems of safety is a first step in making real safety fixes. It requires worker

empowerment and leadership in problem solving, identifying and addressing safety issues and proposing solutions. Integrating continuous opportunities for training, skill development and transmission, and collaborative problem solving is an essential feature of a systems approach to safety.

- Clearly written procedures, with periodic review and revision based on worker experience and feedback, and an expectation of procedure compliance are essential elements of a systems approach to safety.
- Safety events are addressed through root cause and incident analysis, not disciplinary action; the emphasis is on strengthening the system of safety, *not* blaming the individual.
- The safety culture should recognize the values of mutual respect, sharing of responsibility and power, and collective collaborative work among all employees of the gas business, both management and labor.
- In our industry safety and service levels are intimately intertwined. The goal is consistently utilizing our experience and knowledge, tools and training to create a safe, injury-free and event-free environment for workers and the public. This entails re-establishing performance levels and metrics that have historically prevailed in the industry.

This approach to developing a safety culture is consistent with best practices in the nuclear industry and with best practices at other gas utilities. The UWUA has provided leadership in safety culture development and offers programs at the national level for worker/management cooperation and worker empowerment in the safety area.<sup>2</sup> A successful systems approach to safety requires a high degree of commitment and involvement by utility senior management and the full engagement of both union and management at all levels in an atmosphere of mutual respect in order to empower employees to create and maintain a safe environment for the public. Articulating the expectation and describing the principles must be accompanied by concrete measures of implementation.

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<sup>2</sup> See below at fn. 3 on page 14, *Section III.A. Workshops*, for a list of utilities that work with the UWUA Systems of Safety program.

**B. Safety Plan.** Institutionalizing a safety culture based on a systems approach to safety is best accomplished by developing a forward-looking plan that is the basis for holding the pipeline operator accountable and measuring progress in eliminating and mitigating identified hazards. The elements of the plan should include at a minimum:

- identifying and eliminating hazards and systemic risks in order to prevent accidents, explosions, fires, and dangerous conditions and protect the public and its employees;
- identifying the safety-related systems that will be deployed to eliminate or mitigate hazards, including adequate documentation of gas plant history and capability;
- providing adequate storage and transportation capacity to safely deliver gas to all customers consistent with rules authorized by the commission governing core and noncore reliability and curtailment, including provisions for expansion, replacement, preventive maintenance and reactive maintenance including repair of gas plant;
- providing for effective patrol and inspection of the gas plant to detect leaks and other compromised facility conditions and to effect timely repairs;
- providing for appropriate and effective system controls, both equipment and personnel procedures, to limit the damage from accidents, explosions, fires and dangerous conditions;
- providing timely response to customer and employee reports of leaks and other hazardous conditions and emergency events, including disconnect/reconnect and pilot-lighting procedures;
- establishing appropriate protocols for determining maximum allowable operating pressures on relevant pipeline segments, including all necessary

documentation affecting calculation of maximum allowable operating pressures;

- preparing for, preventing or minimizing damage from, and responding to earthquakes, fires, storms and other major events;
- ensuring adequate numbers of properly trained gas corporation employees to carry out these activities;
- exceeding the minimum standards for safe design, construction, installation, operation and maintenance of gas transmission and distribution facilities prescribed by regulations issued by the US Department of Transportation in 49 CFR Part 192.

The safety plan would begin with the hazard mapping, a comprehensive and proactive approach to answering the Commission's existential questions underlying the "systemic risk assessment" topic: "...'what else is out there?' and 'what can we do to prevent another tragedy from unexpected sources?'" (February 24 Order, Paragraph 7)

The February 24 Order appears to focus on aging transmission infrastructure and to prioritize hazards of large and potentially catastrophic magnitudes. In other words, are there other San Brunos. Rancho Cordovas and Allentowns ? Beginning to answer this question involves steps such as the Commission has undertaken with PG&E in response to San Bruno – (1) review of documentation of the characteristics and capacities of existing physical infrastructure to establish solid baseline data as a foundation for operating procedures that permits a degree of confidence; (2) articulating improved patrol, inspection, testing and documentation practices in the field – more frequent, more thorough and more completely documented – implementing them effectively and ensuring continuity over time. (3) Once the physical deficiencies and hazards are mapped, a program for eliminating the identified hazards and managing the risks associated with hazards that cannot be immediately eliminated must be developed.

These procedural steps affecting physical characteristics of the pipeline system should be undertaken uniformly for all pipeline operators, as the Assigned Commissioner suggests in the March 24 ACR, Items 2.1 (operational limitation on certain pre-1970 pipes where surveillance may have lagged) and 2.4 (enhanced inspection procedures for pipes with certain physical characteristics where pressures may be frequently increased to MAOP). Items 2.1 and 2.4 are examples of generic hazards that the Commission has identified, but which may differ in frequency and severity among the utilities. Requiring development of a utility-specific plan, including procedures to identify the specific hazards associated with old pipe (Item 2.1) and strategic cycling of pressures in certain potentially compromised pipe (Item 2.4) will permit the Commission to oversee a proactive approach to eliminating these hazards among others, while preserving to each utility the ability to identify and manage risks associated with the physical plant.

Equally important to the development of a safety culture are the human factors that impact safety. This is especially true for California, where a problem of aging infrastructure is universally acknowledged. The continued performance of potentially fatigued physical equipment and material often depends on the judgment and performance of the employees who operate and maintain it. The public benefits from a trained, skilled, motivated, and well-equipped force of workers, who are fully engaged in all of the issues involved in operating and maintaining the plant and equipment with which they are entrusted. Robust interaction among labor, management and regulators about the behavior of that system and the most efficient and effective ways to keep it safe is the best assurance that consumers will get the service they need at an affordable just and reasonable rate.

In this respect safety practice can build on programs that already exist for addressing workplace safety, particularly the development of clear procedures for performing work safely and efficiently and the development of a culture of

procedure compliance. Hazard mapping and hazard elimination should focus on factors that undermine procedure compliance, including scheduling of work orders, employee assignment completion and compliance with procedures in the field including documentation, and the use of independent contractors where direct observation of compliance may be attenuated and irregular, and where re-working may be necessary.

From the public safety standpoint, hazard mapping should begin at the customer level, with identifying and eliminating conditions and practices that may cause explosions, fires, illness or other forms of injury or damage due to defective equipment, facilities, procedures or other conditions including customer misuse or error. This might include improved leak detection and response, pilot lighting and other assistance with appliances, more timely connection and reconnection services (especially during the heating season), more effective and responsive customer service call handling. Focusing exclusively on the high pressure system such as the one that exploded in San Bruno may miss a ongoing problems at the distribution and customer service levels – both actual events causing injury and damage and near misses, which may be most instructive in identifying and evaluating hazards and avoiding damage.

The important point is that hazard mapping and elimination is an ongoing, continuous and interactive approach of proactively identifying hazards. It is not a one-time snapshot, but an integral part of the safety culture that asks continuously “how can this hazard be eliminated before it causes injury or damage,” with full participation and input from the employees.

The plan would be submitted to the Commission for initial approval and would be regularly reviewed and subject to compliance audit. This is not inconsistent with federal pipeline integrity requirements, but would apply to both transmission and distribution including customer services beyond the reach of federal authority. This requirement would apply to all pipeline operators. The

safety plan would be submitted to and approved by the Commission, whose continuous oversight and review would be a significant form of accountability.

### **C. Transparency of the Safety Commitment for Government Agencies**

A systems approach to safety requires removing obstacles to reporting of safety issues, both compliance and non-compliance, to regulators and enforcement agencies. The goal is a cooperative proactive approach to safety that avoids damage before it happens, replacing a reactive, blame-fixing approach to damage that might have been prevented. UWUA proposes a regular and consistent flow of communication among utility managers, employees and government agencies, in accordance with the following principles:

- Gas pipelines are essential facilities providing a critical and essential good to the California public. Safe operation is of paramount importance for employees of the utility and for the consuming public who live in proximity to gas transport and delivery facilities.
- There should be regular institutionalized channels of communications among the three sets of safety stakeholders with direct responsibility for operation – (1) utility managers with operational responsibilities including inspection, monitoring and remediation including repair and replacement; (2) utility employees performing transmission, distribution and field service functions; (3) government agency investigative and enforcement personnel – to enable them to carry out their respective roles in assuring that gas pipeline facilities are operated and maintained in a safe and effective manner for the benefit of the public and consumers of gas service..
- Utility employees through their bargaining representatives should participate fully and equally in development, implementation, interpretation and modification of programs for protecting the safety of the public and of employees, recognizing that in the gas industry all operation and

maintenance programs have implications for safety. They should participate in presentations to agencies having approval authority and should be present when enforcement authorities come on the property to inspect or observe utility operation, maintenance, construction or other activities.

- Utility employees through their bargaining representatives should have established channels of communication at regular intervals independent of management with public agencies having regulatory and enforcement responsibility.

Applying these transparency principles, the suggestion in Item 2.3 of the March 24 ACR that all safety-related conditions be reported, including those corrected by repair or replacement, would be appropriate in a revised section 122.2(d) in G0112-E. This would accomplish three things. (1) It would advance the understanding that safe operation of the gas system is a process that entails constant vigilance and proactive intervention and thus increase public confidence in its safety; (2) it would improve regulators' knowledge and understanding of the condition of particular pipe segments; (3) it would enhance the ability of regulators to account for safety-related utility expenditures.

Item 2.2 of the March 24 ACR requests comment on expanding immediate and quarterly notification where pressures exceed MAOP. The transparency principles would suggest that these incidents – near misses where risk increased but damage did not ensue -- be reported, be subjected to root cause analysis and result in actions to eliminate or mitigate the hazards identified. Quarterly (or perhaps more frequent) reporting of near misses involving excessive pressures is essential in the hazard mapping and mitigation process.

Immediate notification poses different issues, closely tied to emergency response. A near miss need not be reported immediately. However, prompt notification to authorities including emergency responders of increasing pressures, particularly if uncontrolled by pressure regulating or limiting devices, may be

appropriate as an anticipatory measure. An immediate notification rule should be focused on coordinating communications and alerts among potentially affected responder agencies.

### **III. Procedural Issues**

#### **A. Workshops**

In response to UWUA's proposal to utilize the workshop technique in the consolidated GRC proceeding in its Prehearing Conference Statement, the Commission's Scoping Memo in that case invited UWUA to make a workshop proposal in this proceeding.

The Utility Workers Union of America (UWUA) proposed that workshops be held in this proceeding to discuss safety-related programs and costs associated with: the aging natural gas transmission and distribution lines; restoration of after-meter services; enhancing customer communication and response systems. We decline to schedule these kinds of workshops at this point in this proceeding given the resource constraints of the Commission staff and the parties. The Commission just opened a new Order Instituting Rulemaking on February 24, 2011 into new statewide safety and reliability regulations for natural gas pipelines. The input of the UWUA on safety concerns may be more appropriate for that proceeding. A.10-12-005/006, Scoping Memo at p. 12

Workshops offer an important opportunity for developing information of value to the Commission's decision-making process for policy issues, by facilitating recorded/reported interaction among informed party representatives unmediated by the stiff conventions of pre-filed testimony and cross-examination. The direct give-and-take of experts with shared knowledge but possibly differing perspectives, priorities and values can be very instructive in a case such as this one where the commission, utility operators and workers, utility management, and utility service users are facing new challenges that profoundly implicate received ways of doing business.

The workshop approach can also be viewed as promoting the transparency and openness that is essential to creating a true culture of safety. Getting away from the litigation-derived conventions of strategic gaming of information withholding and disclosure in this rulemaking can provide both a model and an experiential introduction to the sort of constructive interactions that would characterize a safety culture.

UWUA proposes five workshops, covering what appear to be the most important areas in developing a safety culture in which all levels of the industry are equally engaged and committed. These workshops would focus on the human factors involved in creating and maintaining safe delivery of natural gas to the public.

#### WORKSHOP 1 – SYSTEMS APPROACH TO SAFETY

The UWUA has a national safety program, Systems of Safety, that facilitates labor-management cooperation in the creation of an effective safety culture in work settings that involve special hazards to employees and the public, particularly the nuclear and natural gas industries.<sup>3</sup> Systems of Safety has two fundamental and completely integrated elements:

- A systems approach to proactive identification and elimination of hazards
- A training program based on the small group activity method (SGAM) that promotes active engagement by employees and managers in safety and a sense of ownership and responsibility for safe practices in the workplace

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<sup>3</sup> UWUA along with its union colleagues in the utility industry such as the IBEW and the Teamsters, works with the following companies among others in promoting the systems approach to safety and the SGAM approach to worker/management safety culture training: Entergy (New York, Massachusetts, Michigan, Vermont); First Energy (Ohio); Con Edison (New York); DTE (Michigan), Peoples Gas (Illinois); Bay State Gas (Massachusetts); Dominion Resources (Massachusetts, Ohio, Pennsylvania); Allegheny Power (Pennsylvania, West Virginia). Southern California Edison has recently instituted a comprehensive safety training program implementing Systems of Safety in cooperation with UWUA and its Local 246.

and the field.

UWUA proposes a workshop led by its National Safety Director John Devlin on Systems of Safety that could cover the following topics: developing a company-wide commitment to safety; proactive hazard mapping; root cause analysis of safety incidents when they occur; systems of safety for eliminating hazards and mitigating hazards that cannot be eliminated. Appendix A is an excerpt from potential workshop materials describing the elements of a systems approach to safety.

### WORKSHOP 2 – TRANSMISSION SAFETY ISSUES

UWUA suggests a workshop to address transmission and storage human factor issues that could include the following topics, without limitation:

- The status of inspection and maintenance programs for the high pressure system;
- Appropriate crew sizes to accomplish operation and maintenance work safely and effectively;
- The importance of clearly written procedures and procedure compliance when working with high pressure pipelines;
- The importance of employee training and ways of improving skill acquisition and transmittal from experienced workers to less experienced workers;
- Procedures for documentation of pipeline segments, including repair and replacement as well as new construction.

### WORKSHOP 3 – DISTRIBUTION SAFETY ISSUES

UWUA suggests a workshop to address distribution (low pressure) human factor issues that could include the following topics, without limitation:

- standards for timely response for accomplishing field work orders, including leak surveys and repairs of detected or reported leaks;
- standards for timely response to safety-related customer service calls, including connections and turn-ons;

- the importance of clearly written procedures and procedure compliance;
- appropriate crew sizes to accomplish operation and maintenance work safely and effectively and in a timely and responsive manner;
- the importance of employee training and ways of improving skill acquisition and transmittal from experienced workers to less experienced workers;
- procedures for documentation of pipeline segments, including repair and replacement as well as new construction.

#### WORKSHOP 4 – CUSTOMER SERVICE AND RESPONSE

UWUA suggests a workshop on customer service and response that would focus on call center procedures and staffing, with the objective of reducing call answer times and expediting service orders.

#### WORKSHOP 5 – AGING PLANT

UWUA suggests a workshop on the importance of preventive maintenance as a mitigation measure for unreplaced aging plant, in both the transmission and distribution segments of the industry.

UWUA will work with SCG representatives and witnesses; with commission staff including – in addition to DRA – CPSD and Energy Division; and with parties such as TURN and Disability Rights Advocates to structure and conduct the workshops and prepare workshop reports for the commissioners. UWUA suggest scheduling the workshops in August in Southern California, at the CPUC offices in Los Angeles.

### **B. Ratemaking and Cost Recovery**

The Sempra Companies (SCG and SDG&E) have general rate case proceedings moving concurrently with this safety proceeding. GRCs are typically the venue for

considering ratemaking policy. UWUA considers this rulemaking proceeding to be focused on ongoing development and review of safety programs, the costs and rate implications of which would be developed in the GRC. In this regard this docket R.11-02-019 should be managed generally in a manner comparable to the proceeding implementing the powerplant operation and maintenance standards directed by Pub. Util. Code 761.3, Stats. 2002, Second Ex. Session, ch. 19, which eventuated in GO 167. That proceeding brought owners, managers, labor and experts together to develop substantive procedures and programs for managing powerplant availability under the supervision of a specially constituted Committee and ultimately the Commission, without directly addressing rates and costs for jurisdictional utilities.<sup>4</sup>

This general approach suggests that this rulemaking proceeding be phased, with the first phase (Phase 1) being focused on the development of the safety culture and the direct programmatic implications of the safety culture. Phase 1 could proceed concurrently with the GRC timetable for development of public and intervenor testimony in the GRC, which would be informed by the developments in Phase 1.<sup>5</sup> The second phase (Phase 2) of the proceeding would be the forum for development of safety plans, including the process for systemic risk analysis (hazard mapping) and hazard elimination and mitigation and would proceed in 2012.

Nevertheless, given the announced scope of R.11-02-019 and the intense interest in the rate implications of the San Bruno explosion, this proceeding can, and probably should, provide high-level policy guidance on ratemaking and revenue implications for safety-related programs at an early enough time to be effective in the consolidated Sempra rate case proceeding and in offset proceedings for

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<sup>4</sup> C.f., D.04-05-018 in R.02-11-039, Section E.3.d., page 29 ff.

<sup>5</sup> Programs developed in the first and second phases would also lend themselves to rate treatment in offset proceedings. Given the recent interest in one-way balancing accounts (c.f., SB 780 (Padilla) and other specific rate treatments, offset proceedings that track developing safety program and plans might be particularly appropriate.

transmission and distribution cost recovery for other utilities. UWUA suggests that the Commission adopt the following principles on an expedited basis in this proceeding.

- The commission should ensure that each gas corporation has sufficient revenues to implement safety plans and programs effectively. All revenues received by the gas corporation that are authorized by the commission for safety plans and programs should be expended by the gas corporation only for the purposes authorized by the commission.
- The commission should prevent ratepayers from directly or indirectly subsidizing unreasonable or imprudent actions by gas corporations, including specifically:
  - (1) The Commission should not require ratepayers to pay for and should not include in rates any revenues that recover, directly or indirectly, costs incurred in connection with
    - (A) data gathering and evaluation work necessitated by inadequate historical compliance with any applicable state or federal standards for record-keeping or by the utility's failure to observe reasonable record-keeping and data maintenance practices;
    - (B) inspection work (including retrofitting and smart pigging) necessitated by unreasonable reliance on faulty records and/or inadequate data concerning pipeline characteristics;
    - (C) maintenance work necessitated by deferral of maintenance or other activities forecast and authorized in prior rate cases.
  - (2) In any proceeding addressing utility recovery of costs (expense and capital) for investments in pipeline reliability, including but not limited to installation of new transmission pipeline valves or other pressure control systems and the replacement of transmission pipe, the Commission should ensure that:

(A) Any such investments are supported by a cost/benefit analysis that considers alternatives to promote safety of the pipeline system;

(B) The adopted ratemaking fairly accounts for any prior failure of the gas corporation to carry out its obligation to safely construct, operate and maintain its gas plant.

- The Commission should dedicate sufficient resources to effectively oversee the implementation of safety plans and programs approved the Commission, including review of documentation, timely inspections, repairs, and responses to abate or address hazardous conditions. The Commission's budget should reflect the Commission's best judgment about sufficient resources.

### **CONCLUSION**

For the foregoing reasons, UWUA requests that the Commission adopt UWUA's substantive and procedural proposals to begin the creation of an effective and thorough-going culture of safety in the gas industry in California.

Respectfully submitted,

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**APPENDIX A:**

**SYSTEMS OF SAFETY**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing document

**COMMENTS OF THE UTILITY WORKERS UNION OF AMERICA (UWUA),  
LOCALS 132, 483, 522  
Representing Employees at Southern California Gas Company,  
on R.11-02-019, Gas Safety Rulemaking**

A copy was served as follows:

[X] **BY E-MAIL:** I sent a true copy via e-mail to all known parties of record in R. 11-02-019 who have provided e-mail addresses, as shown on the website of the California Public Utilities Commission, updated last on April 8, 2011, accessed April 11, 2011. [http://docs.cpuc.ca.gov/published/service\\_lists/R1102019\\_79735.htm](http://docs.cpuc.ca.gov/published/service_lists/R1102019_79735.htm) (names attached)

on the **14<sup>th</sup>** day of **April, 2011**.

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