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11/29/21  
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BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop Safety  
Culture Assessments for Electric and Natural Gas  
Utilities.

Rulemaking 21-10-001  
(Filed October 7, 2021)

**JOINT OPENING COMMENTS OF WILD GOOSE STORAGE, LLC, LODI GAS  
STORAGE, L.L.C., AND GILL RANCH STORAGE ON R.21-10-001**

MICHAEL B. DAY  
MEGAN J. SOMOGYI  
DOWNEY BRAND LLP  
455 Market Street, Suite 1500  
San Francisco, California 94105  
Telephone: 415.848.4800  
Facsimile: 415.848.4801  
Email: [mday@downeybrand.com](mailto:mday@downeybrand.com)  
Email: [msomogyi@downeybrand.com](mailto:msomogyi@downeybrand.com)

Attorneys for Wild Goose Storage, LLC and  
Lodi Gas Storage, L.L.C.

Date: November 29, 2021

PATRICK FERGUSON  
ANNA FERO  
Davis Wright Tremaine LLP  
505 Montgomery Street, Suite 800  
San Francisco, CA 94111-6533  
Tel. (415) 276-6500  
Fax. (415) 276-6599  
Email: [patrickferguson@dwt.com](mailto:patrickferguson@dwt.com)  
Email: [annafero@dwt.com](mailto:annafero@dwt.com)

Attorneys for Gill Ranch Storage

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In accordance with the preliminary schedule set forth in Rulemaking 21-10-001, Wild Goose Storage, LLC (“Wild Goose”), Lodi Gas Storage, L.L.C. (“Lodi”), and Gill Ranch Storage (“GRS”) (collectively the “Joint Storage Parties”) submit their joint opening comments on the Rulemaking.<sup>1</sup> The Joint Storage Parties agree with the Commission that it is crucial for electric and gas utilities to have robust safety cultures. The Joint Storage Parties already perform an annual safety culture assessment for their respective facilities and operations at the Commission’s direction, in addition to complying with a number of annual federal and state safety reporting requirements. If the Commission determines that a safety culture assessment should be adopted for all independent natural gas storage providers (“ISP”), that framework should be designed with the ISPs’ ongoing best practices and existing obligations in mind.

**I. OPENING COMMENTS**

Wild Goose and Lodi already have a Commission-mandated safety culture plan and assessment process.<sup>2</sup> The Commission directed Wild Goose and Lodi to develop and implement

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<sup>1</sup> R.21-10-001 set the due date for opening comments 45 days after the Rulemaking was adopted. In his November 9, 2021 email to the service list, ALJ Rizzo confirmed that parties should count from the October 13, 2021 issuance date of the OIR; 45 days from October 7 is Saturday, November 27; in accordance with Rule 1.15, comments are due the next business day. These comments are timely filed.

<sup>2</sup> D.18-10-029, pp. 12–13.

a safety culture plan focused on meeting and exceeding regulatory requirements and promoting continuous safety improvement, as part of a 2018 refinancing application.<sup>3</sup> The Commission found that the proposed refinancing transaction would provide sufficient funds to ensure safe and reliable service, but the Commission also determined that it was reasonable to direct Wild Goose and Lodi to develop a safety culture plan.<sup>4</sup> Wild Goose and Lodi developed the required plan and submitted it to Energy Division via a Tier 1 Advice Letter, as directed. Since the development and implementation of their safety culture plan, Wild Goose and Lodi have successfully undertaken a safety culture assessment survey as required under the plan and are creating action items from the survey. The survey, which asks respondents to answer on a scale of 1 to 5 their level of agreement or disagreement with the survey statements, is sent out to all employees and contractors on an annual basis.<sup>5</sup>

GRS is also subject to safety culture conditions, as established in settlement agreement between the Office of the Safety Advocate (“OSA”) and GRS.<sup>6</sup> Pursuant to that settlement agreement, GRS has (1) designated a Chief Safety Accountability Officer, who maintains GRS’ safety management system and controls human and financial resources; (2) expanded its Pipeline Management system to create a comprehensive safety management system for the entire Gill Ranch Facility; (3) created a Safety Council to inform organization-wide safety risk decision-making and to propose initiatives for mitigating risk; and (4) adopted a resolution confirming GRS’ commitment to safety as the highest priority of the operations at the Gill Ranch Facility.<sup>7</sup>

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<sup>3</sup> *Id.* at p. 13.

<sup>4</sup> *Id.* at pp. 12–13.

<sup>5</sup> Attachment A, Employee and Contractor Survey Questions.

<sup>6</sup> D.18-05-010.

<sup>7</sup> D.18-15-010, pp. 8-10; Settlement Agreement, Section IV.B.

GRS conducts periodic safety culture assessments no less frequently than every two years and reports results of the assessments to the Energy Division and OSA annually.<sup>8</sup>

In D.18-10-029, the Commission observed that it has also already required PG&E to implement a safety culture program, and that it might in the future consider opening a rulemaking to evaluate whether other natural gas utilities should be required to have safety management procedures and a safety culture plan<sup>9</sup>; it appears that R.21-10-001 is that proceeding. If the Commission determines that a new safety culture framework should be established for all ISPs, the Joint Storage Parties request that the new framework replace the preexisting safety culture assessment requirements, to avoid duplicative or conflicting obligations.

In addition to the Joint Storage Parties' existing Commission-mandated safety culture frameworks, there are specific issues relevant to ISPs set forth in the Order Instituting Rulemaking that merit being addressed by the Joint Storage Parties. The Joint Storage Parties reserve the right to address additional issues in reply comments.

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<sup>8</sup> D.18-15-010, pp. 8-10; Settlement Agreement, Section IV.B.

<sup>9</sup> D.18-10-019, pp. 13-14.

2. **What should be included within the framework of conducting safety culture assessments of electric and gas utilities and gas storage operators? For example, should the scope of safety culture assessments include a review of: organizational management behaviors, governance rules related to organizational safety prioritization, and safety reporting and compliance? Please address the scope of the utility safety culture assessments; the process, frequency, and schedule for conducting these assessments; and what other elements should be considered within the framework.**

The Joint Storage Parties believe the elements of their current safety culture practices encompass the items identified above and promote a safe and supportive working environment for all employees and contractors.

Wild Goose and Lodi's current safety culture plan, which is administered by their parent company, Rockpoint Gas Storage ("Rockpoint"), for all of the gas storage entities in its family, encompasses the substantive areas of organization and management commitment, perceived supervisor competence, accident and near-miss reporting behaviors, clear lines of communication, health and safety trust, usability of safety procedures, and resources for health and safety.<sup>10</sup> A safety culture survey is conducted annually, and action plans are created to address any concerns raised in the survey responses. Rockpoint also has in place a Health, Safety & Environmental Policy ("HSE"),<sup>11</sup> which confirms Rockpoint's commitment to protecting the health and safety of everyone working for them and/or at their worksites; Rockpoint's commitment to the HSE Policy is renewed yearly by the CEO, and the Policy is distributed to all work sites to be posted on the premises.

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<sup>10</sup> Attachment B, Rockpoint Gas Storage Safety Culture Plan.

<sup>11</sup> Attachment C, Rockpoint Gas Storage Health, Safety & Environmental Policy.

Gill Ranch's current safety culture plan and HSE Policy encompass the same substantive attributes as Rockpoint's. As described above, GRS conducts safety culture assessments no less than every two years, to help identify strengths, weaknesses and areas for growth.<sup>12</sup>

The Joint Storage Parties request that the Commission allow them to continue operating under their current safety culture plans and HSE Policies, instead of creating a separate, and likely duplicative, safety culture assessment requirement for ISPs. GRS is a relatively new facility and, as recognized by Commissioner Rechtschaffen, has not had problems and has not identified any safety issues.<sup>13</sup> Wild Goose and Lodi, and all of the storage facilities in the Rockpoint family, have excellent track records of safe and reliable operation; this success is due to Rockpoint's longstanding and robust safety culture.

**5. Should the Commission adopt the process and framework developed through this Order to oversee safety culture assessments of gas utilities and gas storage operators, in addition to electrical corporations as required by SB 901?**

It is not necessary for the Commission to adopt additional processes or frameworks to oversee safety culture assessments of independent gas storage providers. ISPs have excellent track records of safe and reliable operations—unlike the large electric utilities, whose chronic infrastructure failures led to the catastrophic wildfires of 2017 and 2018, which, in turn, gave rise to SB 901 and its requirement for regular safety culture assessments. Moreover, the Joint Storage Parties already conduct Commission-mandated periodic safety culture assessments and operate in accordance with established HSE Policies.

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<sup>12</sup> See D.18-05-010, p. 10.

<sup>13</sup> CPUC Decision Conference, May 10, 2018 (*see*: [http://www.adminmonitor.com/ca/cpuc/voting\\_meeting/20180510/](http://www.adminmonitor.com/ca/cpuc/voting_meeting/20180510/) at 59:20 to 1:01:12).

As part of their ongoing safe operations, ISPs are subject to a number of annual safety and operations reporting requirements that allow the Commission, and other state and federal agencies, to keep abreast of the ISPs' operations and safety practices. These are summarized in the following table:

<b>Report</b>	<b>Reference</b>	<b>Frequency</b>	<b>Description</b>
CPUC Quarterly Summary Report	GO 112-F, 122.2(d)	January/April/July/October. By the 30 <sup>th</sup> of each listed month for the preceding quarter.	A summary of all CPUC reportable and non-reportable incidents which occurred in the preceding quarter that meet the criteria of 122.2(d).
CPUC Annual Report	GO 112-F, 123.2(a)-(j)	Annually by March 15	A report containing information to demonstrate to the CPUC and the public an Operator's efforts towards minimizing the risk from system leaks and failures. Report is comprised of an MS Excel file with worksheets to address each of the requirements within GO 112-F (a) through (j).
Natural Gas Transmission Pipeline Annual Report	PHMSA Form 7100.2-1	Annually by March 15	A report containing gas transmission pipeline performance measures. Report is comprised of detailed information for all jurisdictional transmission pipelines (e.g., volume transported, HCA miles, integrity inspections).
Underground Natural Gas Storage Facility Annual Report	PHMSA Form 7100.4-1	Annually by March 15	A report containing underground natural gas storage facility performance measures. Report is comprised of detailed information for each storage reservoir (e.g., volumes, flow, maintenance).
DIRT facility event reporting	CA Code 4216.6	Annually by March 31	Damage Information Reporting Tool (DIRT) report contains metrics for pipeline events, near misses, and damages.
CPUC/CARB Methane Leakage Abatement Report	SB 1371	Annually by June 15	A report detailing methane leaks and associated greenhouse gas emissions. Report is comprised of detailed MS Excel files broken down by emission source and type.

CPUC Natural Gas Safety Plan	GO 112-F, 123.2(k)	Annually by March 15	Comprehensive plan for the safe and reliable operations of gas pipeline facilities. CPUC Natural Gas Safety Plan includes many attachments; most other compliance manuals are included (e.g. Emergency Response Plan, Integrity Management Plan, Operations and Maintenance Plan).
Hazardous Materials Business Plan (provided to the Certified Unified Program Agency (CUPA) for each facility <sup>14</sup> )	40 CFR § 370	Annually by January 15 (Lodi) / March 1 (Wild Goose)	Plan with the purpose of preventing or minimizing damage to public health and safety from a release or threatened release of hazardous materials. Plan includes an inventory of hazardous materials, site maps, emergency plan, and training program.
Annual Summary of Injuries and Illnesses	OSHA Form 300	Annually by February 1	Form contains information relating to employee health and tracks work-related injuries and illnesses.

Between the ISPs' existing safety culture assessments and their annual operational and safety reporting obligations, the Commission has a significant amount of oversight—and insight—of the safety of the ISPs' facilities, operations, cultures, and practices. If the Commission decides to adopt a new safety culture assessment for all ISPs in this proceeding, the framework should be designed with reference to the ISPs' existing safety programs, reporting obligations, and operations. Any new safety culture framework should replace existing safety culture assessment requirements to avoid duplicative obligations, and the new framework should not be more onerous than the assessment and reporting obligations currently in place.

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<sup>14</sup> For example, Lodi's CUPA is the San Joaquin County Environmental Health Department.



6. **Should the Commission adopt the same or different safety culture assessment process, requirements, and timeline for large electric and gas investor-owned utilities, small and multi-jurisdictional electric and gas utilities, and gas storage operators, or should these vary? How should the Commission ensure that the safety culture assessment process provides adequate, consistent, and persistent guidance without being overly prescriptive or too broad.**

The Commission should adopt different processes, requirements, and timelines for the large utilities, small and multi-jurisdictional utilities, and gas storage operators. The large investor-owned utilities' operations and facilities are drastically different from those of the ISPs or smaller utilities, and the safety culture frameworks must be tailored to the specific utility or storage provider. The large gas distribution utilities have thousands of miles of natural gas distribution and transmission lines in both urban and rural settings. In addition, many of the pipelines and wells utilized by PG&E and SoCalGas are many decades old, and were not originally designed for the multiple injection and withdrawal cycles required of a gas storage field. Managing such a network of facilities requires a massive organizational effort to construct, document, maintain, inspect and repair. In contrast, ISPs possess only a limited number of wells, and far less extensive pipeline systems, which are used only for connecting wells to compressor stations and interconnecting the compressor stations to the larger utility transmission systems. In addition, the ISPs' facilities are far newer, with wells, pipelines and compressors that were specifically sized and built to serve the needs of a gas storage facility. Clearly, the effort required to safely operate such systems is a different order of magnitude from that of the large gas distribution facilities.

Accordingly, the Commission should allow the ISPs to continue operating under their existing safety culture frameworks; creating an additional assessment framework for ISPs would be duplicative. Requiring the ISPs to comply with safety frameworks designed to address the far

larger and more complex gas distribution utility systems would be unnecessarily complex and inefficient.

The Commission should monitor the effectiveness of the ISPs safety culture frameworks by comparing the goals of those plans with the results provided by the extensive reporting systems already in place. The Commission should look for increases in accidents, leaks, near-misses, etc., as an indication that a utility's safety culture framework needs to be carefully reassessed. In the absence of a significant number of negative incidents, there is no reason for the Commission require more than to simply ensure ongoing compliance with the approved safety culture framework.

## **II. CONCLUSION**

The Joint Storage Parties support the Commission's goal of ensuring that electric and gas service providers operate safely and maintain robust safety cultures. The Commission has already directed the Joint Storage Parties to develop the safety culture framework contemplated for other entities in this proceeding, and the Joint Storage Parties have developed and implemented such frameworks. Not only do the Joint Storage Parties have existing safety culture plans and assessment processes, but they have a number of annual reporting obligations that provide the Commission and other regulatory agencies with insight into, and oversight of, the Joint Storage Parties' operations and safety practices. If the Commission decides that additional or new safety culture obligations should be adopted for all of the ISPs, those requirements should be created with the ISP's existing safety records, safety practices, and safety obligations in mind, and should replace any preexisting obligations to avoid duplication.

DATED: November 29, 2021

Respectfully submitted,

DOWNEY BRAND LLP

By:   
MICHAEL B. DAY

Attorneys for Wild Goose Storage, LLC and Lodi  
Gas Storage, L.L.C.

DAVIS WRIGHT TREMAINE LLP  
PATRICK FERGUSON  
505 Montgomery Street, Suite 800  
San Francisco, CA 94111-6533  
Tel. (415) 276-6500  
Fax (415) 276-6599  
Email: [patrickferguson@dwt.com](mailto:patrickferguson@dwt.com)

Attorneys for Gill Ranch Storage

## **ATTACHMENT A**



# Safety Culture

## Employee Feedback Survey

### Organizational and Management Commitment

1. Rockpoint Management demonstrate through their actions that safety is a top priority at Rockpoint.
2. Rockpoint Management actively support applying best practices across different areas of the business.
3. Employees at Rockpoint feel comfortable flagging safety concerns to Management
4. Good ideas are adopted at Rockpoint regardless of who suggest them.
5. Conditions at Rockpoint make it safe to challenge the status quo.
6. There is a sense of optimism within my work group about Rockpoint's future
7. I feel that my work contributes to Rockpoint's success
8. I get recognition for doing my job safely.

### Perceived Supervisor Competence

9. I have access to coaching or guidance on how to perform specific tasks safely.
10. My supervisor acts promptly to correct safety issues
11. My supervisor insists that safety rules are carefully followed even if it means that work is slowed down.

### Accident and Near Miss Reporting Behaviors

12. In my work group, we use mistakes as an opportunity to learn and improve
13. I have the knowledge and experience to recognize and identify hazards in my workplace.
14. People in my work group report injuries and incidents, no matter how minor.
15. The near misses that occur in my work group are reported to my supervisor.

### Clear Lines of Communications

16. I can safely share my thoughts, concerns, and opinions with my supervisor.
17. I feel comfortable discussing safety issues with my supervisor.
18. My supervisor communicates useful information to employees.
19. Rockpoint has tools in place that enable employees to easily share information.
20. Management provides a clear direction for Rockpoint staff.



# Safety Culture

## Employee Feedback Survey

### Health and Safety Trust

21. I am proud to work for Rockpoint
22. I am willing to give extra effort to help Rockpoint meet its goals
23. I feel free to stop my work if I believe conditions are unsafe.
24. I understand and adhere to Rockpoint's Safety Policy and Code of Conduct.
25. My work group values diverse perspectives.
26. I am aware of how to report safety concerns or observed misconduct at Rockpoint.
27. Unsafe behavior is not tolerated in my work group.
28. Acting ethically and with integrity in my work group takes priority over achieving business results.
29. I can report unsafe behavior or practices without fear of retaliation at Rockpoint.
30. Rockpoint responds quickly and consistently to proven unsafe behavior.

### Usability of Safety Procedures

31. My work group follows safe work practices without taking short cuts.
32. The work processes and procedures I have available enable me to perform my tasks safely.
33. The people I work with cooperate to get the job done.
34. Roles and responsibilities within my work group are clear.
35. Work is prioritized effectively within my work group.

### Resources for Health and Safety

36. I have enough information to do my job well.
37. I feel that I am adequately trained and competent to perform my tasks.
38. I have properly designed and maintained equipment and tools available.
39. There are enough guards, barriers and signage in place at my workplace.
40. I have the personal protective equipment (PPE) needed to perform my work safely.
41. I see people in different departments and groups collaborating with one another.
42. Processes in my work group are well-organized and efficient.
43. I have the authority to respond to imminent safety issues without seeking approvals.
44. I have the authority to make decisions that improve the quality of my work.



# Safety Culture

## Contractor Feedback Survey

1. Rockpoint demonstrate through their actions that safety is a top priority.
2. Rockpoint actively support applying best practices.
3. We feel comfortable flagging safety concerns to Rockpoint.
4. Good ideas are adopted at Rockpoint regardless of who suggest them.
5. Conditions at Rockpoint make it safe to challenge the status quo.
6. We get recognition for doing our job safely.
7. Rockpoint acts promptly to correct safety issues
8. Rockpoint insists that safety rules are carefully followed even if it means that work is slowed down.
9. Rockpoint provides proper site orientation and job safety analysis to recognize and identify hazards in its workplace.
10. Rockpoint encourages to report injuries and incidents, no matter how minor.
11. We feel free to stop work if we believe conditions are unsafe.
12. We understand and adhere to Rockpoint's Safety Policy and Code of Conduct.
13. Unsafe behavior is not tolerated at Rockpoint.
14. I can report unsafe behavior or practices without fear of retaliation at Rockpoint.

## **ATTACHMENT B**



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**ROCKPOINT GAS STORAGE**

**SAFETY CULTURE PLAN**

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**ROCKPOINT**

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G A S   S T O R A G E

TABLE OF CONTENTS

**INTRODUCTION .....3**

**1.0 SAFETY CULTURE INITIAL AND RECURRING ASSESSMENTS .....4**

**2.0 DOCUMENTATION OF SAFETY POLICIES / PROGRAM .....5**

**3.0 LEADERSHIP .....5**

**4.0 EMPLOYEE INPUT.....7**

**5.0 TRAINING .....7**

**6.0 INCIDENT REPORTING / DOCUMENTATION .....8**

**7.0 CONTRACTOR SAFETY .....8**

**8.0 MANAGEMENT SIGNATURE AND AUTHORITY .....9**

**9.0 VERSION LOG.....9**

## INTRODUCTION

### Foreword

We at Rockpoint Gas Storage (Rockpoint) are committed to working in a responsible manner, one that prioritizes the wellbeing and protection of our workers, the public and the environment.

Rockpoint believes that the health, safety and wellbeing of our employees, contractors, customers and the public are the highest priority. It is our goal and objective to operate our business in such a way as to prevent harm to people and to protect the environment. We will comply with all applicable health, safety and environmental laws and regulations. It is the expectation that all workers, on Rockpoint work sites, adhere to company health, safety and environmental practices as well as applicable government laws and regulations. We will not jeopardize or compromise our HSE principles for profit or production.

Rockpoint's Safety Culture Plan (this Plan) is a component of the comprehensive safety management programs in place at Rockpoint. The objective and scope of the Safety Culture Plan are detailed below.

### Objective of the Safety Culture Plan

This Plan has for objective to develop a safety culture that focuses on meeting and exceeding regulatory requirements and promoting continuous safety improvement.

A positive safety culture is essential to an organization's safety performance. Safety culture is the collective set of attitudes, values, norms, beliefs and practices that a company employees and contractor personnel share with respect to risk and safety. A positive safety culture is one where employees and contractor personnel collaborate; have positive attitudes towards compliance (meeting and exceeding minimum standards); feel responsible for public safety, and protection of the environment, for each other's safety, and for the health of the organization, and fundamentally believe in non-punitive reporting.

Maintaining a positive safety culture requires continual diligence throughout the company to address issues including complacency, fear of reprisal, over confidence, and normalization of deviance. This Plan sets action items to assess and improve the following indicators of a positive safety culture:

- Embraces safety (personnel, public, and assets) as a core value;
- Assures everyone understands the organization's safety goals;
- Fosters a systematic consideration of risk, including what can go wrong;
- Inspires, enables, and nurtures change when necessary;
- Allocates adequate resources to assure individuals can successfully accomplish their safety management system responsibilities;
- Encourages employee engagement and ownership;
- Fosters mutual trust at all levels, with open and honest communication;
- Promotes a questioning and learning environment;
- Reinforces positive behaviors and why they are important;

- Encourages two-way conversations about learnings and commits to apply them throughout the organization; and
- Encourages non-punitive reporting and assures timely response to reported issues.

### **Scope of the Safety Culture Plan**

This Plan is not meant to create duplication with the other compliance plans already required by regulations, but to lay out the over-arching principles and action items to be implemented to create and continuously nurture a positive safety culture within Rockpoint Gas Storage.

This Plan applies to all employees and contractors operating, maintaining and managing the underground gas storage assets (UGS assets) operated within the Rockpoint Gas Storage group of companies. For greater certainty, the following assets are covered by this Plan:

- AECO Gas Storage Partnership
- Warwick Gas Storage, LP
- Lodi Gas Storage, LLC
- Wild Goose Storage, LLC
- Salt Plains Storage, LLC

## **1.0 Safety Culture Initial and Recurring Assessments**

Rockpoint Gas Storage will utilize a survey as a method of assessing the overall health of the safety climate within the organization and identify areas of opportunity to improve focus and commitment to safety.

Items covered in the survey (Appendix B) include the following:

- Organization and Management Commitment
- Perceived Supervisor Competence
- Accident and Near Miss Reporting Behaviors
- Clear Lines of Communication
- Health and Safety Trust
- Usability of Safety Procedures
- Resources for Health and Safety

The results of the surveys are to be reviewed by the Corporate Safety Officer and Upper Management to identify opportunities for improvement, establish action items, person responsible, and set target dates for completion.

### **Action Items:**

1. The Safety Culture Survey is to be initially developed and sent out within a year of this Plan being implemented, and annually thereafter, and the results are to be reviewed by Upper Management within 60 days from the date of issue.
2. Upper Management will identify any concerns in the responses and put together an action plan to address them with expected completion dates.
3. Aggregated response data will be shared with staff within 90 days from the date of issue.



## **2.0 Documentation of Safety Policies / Program**

Rockpoint Gas Storage has in place a Health, Safety & Environmental Policy. This policy confirms Rockpoint's commitment to protecting the health and safety of everyone working for them and/or at their work sites. Commitment to the policy is renewed yearly by the Chief Executive Officer of Rockpoint Gas Storage, who reviews and signs the policy, and distributes it to all work sites, to be posted on the premises. The current policy is included in Appendix B.

Rockpoint develops clear safety goals and objectives, both at the corporate and personal level. Achievement of these goals impacts compensation.

### **Action Items:**

4. Annual review and renewed commitment to Rockpoint's Health, Safety & Environmental Policy. Distribute the renewed policy to all work sites to be posted on the premises.
5. Set yearly corporate and personal goals and objectives related to safety performance.

## **3.0 Leadership**

Rockpoint's safety culture hinges on the leadership provided by management. From the President & CEO down through the vice president of Engineering & Operations and mid-level managers; safety is a priority.

Upper and mid-level management overseeing operation and maintenance of Rockpoint's UGS assets are required to take safety training related to the work that they perform or manage. Representation from upper and mid-level management is required at a significant number of safety related activities, such as conference calls, meetings and site inspections.

For the purpose of implementing this Plan, Rockpoint appoints a Corporate Safety Officer. The roles and responsibilities of the Corporate Safety Officer are described below.

### **Upper Management**

For the purpose of this Plan, Upper Management at Rockpoint Gas Storage consists of the corporate executives responsible for operation and maintenance of the UGS assets. Upper Management shall lead and demonstrate its commitment to the development, implementation, continuous improvement, and evaluation of the maturity of its safety management system by:

- Promoting a positive safety culture and leading by example;
- Establishing and maintaining policies, goals, and objectives that promote safety;
- Ensuring that the elements set forth in this Plan are in place, with clear accountability for implementation and with a clear connection between objectives and day-to-day activities;
- Leading a resource allocation process that includes safety as a priority;
- Appointing a Corporate Safety Officer who reports directly to Upper Management.

### **Mid-Level Management**

Mid-Level Management at Rockpoint Gas Storage consists of the leaders at each UGS worksites and managing engineering and operations staff at Rockpoint's head office. Mid-Level Management shall:

- Promote a positive safety culture and lead by example;
- Establish, implement, evaluate, and improve processes, procedures, systems, and training to meet policies, goals and objectives;
- Ensure there is a clear connection between objectives and day-to-day work activities, including those needed to meet the requirements of this safety culture plan;

#### **Corporate Safety Officer**

The Manager of Environment, Health & Safety for Rockpoint Gas Storage acts as the Corporate Safety Officer. The roles and responsibilities of the Corporate Safety Officer are:

- Reports to Upper Management (Vice President, Engineering & Operations);
- Responsible for the development and implementation of the Environment, Health & Safety programs within the Rockpoint Gas Storage platform, including the Safety Culture Plan;
- Promote a positive safety culture and lead by example;
- Participate in the budgeting process to ensure adequate resources are allocated to safety programs.

#### **Action Items:**

6. Upper Management and Mid-Level Management are required to take safety training. The Corporate Safety Officer shall ensure that Management receive training as per the Safety Culture Plan training matrix schedule.
7. Representation from Upper Management and Mid-Level Management shall be required in quarterly Environment, Health & Safety conference calls with the UGS work sites. These conference calls shall include the leaders from each of the UGS work sites managed by Rockpoint Gas Storage and promote sharing of experiences and practices.
8. Representatives from Upper Management and Mid-Level Management shall visit the work sites for the purpose of promoting safety. The visits shall include specific activities such as: participating in safety inspections, performing task observations, participating in safety meetings, etc. These visits shall be documented.
9. Appointment of the Corporate Safety Officer shall be confirmed annually, at the time of the budgeting exercise. Participation of the Corporate Officer in the budgeting exercise shall be documented.

## 4.0 Employee Input

Rockpoint management will review the annual safety culture survey results. Management is tasked with identifying any items of concern found in the survey results and acting on them in a timely manner. Trending of the annual surveys will also be performed to identify any potential issues or concerns that may be developing as well as to evaluate the success of new safety initiatives.

In addition to the safety culture survey, employees are also encouraged to provide their inputs through several means at their disposition, such as: 1) reporting of hazards, near misses and incidents at any time using forms provided for that purpose, 2) provide input at the safety meetings held at each work site, 3) provide input at the quarterly conference call between all work sites and Upper Management, 4) provide input anonymously with the reporting hotline.

### Action Items:

10. Upper Management will identify any concerns in the survey responses and put together an action plan to address them with expected completion dates.
11. Employees to be reminded of the several means for them to provide inputs and share best practices, in the form of an annual promotional communication.

## 5.0 Training

Rockpoint has developed and uses training matrices that highlight the various training requirements based upon the individual's roles and responsibilities. It is not within the scope of this Plan to re-iterate the training already required by regulation in the different jurisdictions where Rockpoint operates. This Plan sets safety related training aimed at strengthening safety culture and to be followed by employees and contractors involved in operation and maintenance of the UGS assets.

Training to be followed as per this Plan includes:

- General safety awareness and safety management training;
- Training on the regulations applicable to Rockpoint operations;
- Training on the plans and procedures in place at Rockpoint;

### Action Items:

12. Track employee compliance to Safety Culture Plan training matrix annually.
13. Review Safety Culture Plan training content annually to verify adequacy and update if required.



## 6.0 Incident Reporting / Documentation

Rockpoint Gas Storage utilizes a consistent system across its UGS platform to report: 1) hazards identification, 2) near misses, 3) incidents. Reporting is strongly encouraged, and these reports are shared across the organization.

Incident investigation uses the *DNV Systematic Cause Analysis Technique* (SCAT) for root cause analysis. This root cause analysis method is both easy to use and effective and used extensively throughout the oil and gas industry. By identifying these root causes, Rockpoint can properly address them to prevent or reduce the likelihood of future incidents. All reported incidents are kept on record. Each incident report contains an executive summary of the incident and corrective actions taken to help prevent future occurrences.

Rockpoint continuously promotes and encourages the reporting of hazards, near-misses and incidents. In addition to sharing every incident report across the organization, a summary of these are shared throughout via HSE Scorecards. They are also reviewed during the safety meetings at the work sites, and the quarterly conference call with Upper Management and all work sites.

### Action Items:

14. Share incident reports across Rockpoint's UGS platform as they become available.
15. Look back at hazards, near misses and incidents during safety meetings and quarterly conference calls. Ensure proper learnings and closure are attained.

## 7.0 Contractor Safety

Management of contractor starts with Rockpoint's Procurement Policy. As per this policy, contractors working on the UGS work sites are required to be registered in Rockpoint's contractor management system and be in good standing.

When contractors come to Rockpoint's work sites, safety training tailored for contractors is provided by Rockpoint. Contractor workers are required to undertake both a corporate safety orientation as well as a site-specific orientation to ensure they are made aware of hazards that may be present on our worksites as well as our general safety rules and expectations. During these orientations, Rockpoint learns about what hazards the contractor will be introducing to the worksite. This allows the Rockpoint operations staff to determine what measures will need to be implemented to ensure the safety of the contractors as well as our own workers and the public.

Contractors working on a Rockpoint site may be subject to random audits that are designed to verify that they abide to the required safety practices.

### Action Items:

16. Identify and include most frequent contractors in the safety culture survey. The feedback from these contractors shall be included in the safety culture assessment.
17. Rockpoint's contractor management system is to be consulted by the project managers before bringing contractors to the work site.




18. Contractor personnel safety training is to be performed systematically and documented when contractors are coming to the work sites.
19. Contractor spot check audits are to be performed by Rockpoint employees on a representative sample of all safe work permits issued in a year.

## 8.0 Management Signature and Authority

### MANAGEMENT SIGNATURE and AUTHORITY

I, Simon Dupere, President and CEO, give authorization to conduct and complete the necessary requirements as outlined in this document and hereby approve the Rockpoint Gas Storage Safety Culture Plan.



Simon Dupere, President and CEO

October 25, 2019  
Date

## 9.0 Version Log

Version Number	Effective Date	Review By:	Approved By:
Version 1	October 25, 2019	Harold Gold Mathieu Fournier Simon Dupere	Simon Dupere

# Appendix A

## Action Item Summary Listing

## Action Item Summary List

Item No.	Description	Frequency
1	The Safety Culture Survey is to be initially developed and sent out within a year of this Plan being implemented, and annually thereafter, and the results are to be reviewed by Upper Management within 60 days from the date of issue.	Annually
2	Upper Management will identify any concerns in the responses and put together an action plan to address them with expected completion dates.	Annually
3	Aggregated response data will be shared with staff within 90 days from the date of issue.	Annually
4	Annual review and renewed commitment to Rockpoint's Health, Safety & Environmental Policy. Distribute the renewed policy to all work sites to be posted on the premises.	Annually
5	Set yearly corporate and personal goals and objectives related to safety performance.	Annually
6	Upper Management and Mid-Level Management are required to take safety training. The Corporate Safety Officer shall ensure that Management receive training as per the Safety Culture Plan training matrix schedule.	Annually
7	Representation from Upper Management and Mid-Level Management shall be required in quarterly Environment, Health & Safety conference calls with the UGS work sites. These conference calls shall include the leaders from each of the UGS work sites managed by Rockpoint Gas Storage and promote sharing of experiences and practices.	Annually
8	Representatives from Upper Management and Mid-Level Management shall visit the work sites for the purpose of promoting safety. The visits shall include specific activities such as: participating in safety inspections, performing task observations, participating in safety meetings, etc. These visits shall be documented.	Annually
9	Appointment of the Corporate Safety Officer shall be confirmed annually, at the time of the budgeting exercise. Participation of the Corporate Officer in the budgeting exercise shall be documented.	Annually
10	Upper Management will identify any concerns in the survey responses and put together an action plan to address them with expected completion dates.	Annually
11	Employees to be reminded of the several means for them to provide inputs and share best practices, in the form of an annual promotional communication.	Annually

Item No.	Description	Frequency
12	Track employee compliance to Safety Culture Plan training matrix annually.	Annually
13	Review Safety Culture Plan training content annually to verify adequacy and update if required.	Annually
14	Share incident reports across Rockpoint's UGS platform as they become available.	Continuous
15	Look back at hazards, near misses and incidents during safety meetings and quarterly conference calls. Ensure proper learnings and closure are attained.	Continuous
16	Identify and include most frequent contractors in the safety culture survey. The feedback from these contractors shall be included in the safety culture assessment.	Annually
17	Rockpoint's contractor management system is to be consulted by the project managers before bringing contractors to the work site.	Continuous
18	Contractor personnel safety training is to be performed systematically and documented when contractors are coming to the work sites.	Continuous
19	Contractor spot check audits are to be performed by Rockpoint employees on a representative sample of all safe work permits issued in a year.	Continuous

# **Appendix B**

## **Rockpoint Gas Storage**

### **Health, Safety & Environmental**

### **Policy**



## HEALTH, SAFETY & ENVIRONMENTAL POLICY

### HSE Commitment

We at Rockpoint Gas Storage (Rockpoint) are committed to working in a responsible manner, one that promotes the well-being and protection of our workers, the public and the environment.

We will operate our facilities to the highest standard, one that respects the health and safety of our employees, contractors, customers, communities and the environment in which we operate. Rockpoint will ensure that:

- Compliance with Health, Safety and Environmental rules and regulations come first, regardless of the magnitude or urgency of the job.
- Personnel are available to provide the resources and guidance necessary for continuous improvement to health, safety and environmental procedures.
- Our employees are provided with the tools and training necessary to allow them to conduct their work in a healthy, safe and environmentally productive manner.

### HSE Principles

Rockpoint believes that the health, safety and well being of our employees, contractors, customers and the public take precedence. It is our goal and objective to operate our business in such a way as to prevent harm to people and to protect the environment. We will comply with all applicable health, safety & environmental laws and regulations. It is the expectation that all workers, on Rockpoint work sites, adhere to company health, safety and environmental practices as well as applicable government laws and regulations. We will not jeopardize or compromise our HSE Principles for profit or production.

### Health and Safety

- Every worker employed on a Rockpoint work site has the right to a healthy and safe environment.
- Rockpoint embraces a 100% compliant healthy and safe culture and places the protection of people from injury above all other management considerations.
- Prior to the commencement of work, safe work procedures shall be developed, reviewed by all affected workers and adhered to.
- Personal Protective Equipment is made available and must be used.

### Environment

- Rockpoint is committed to responsible stewardship of the environment at our worksites, as appropriate for our industry.
- As part of ongoing efforts to protect the environment, Rockpoint will comply with environment regulations and agreements to continuously improve our environment management practices.
- Rockpoint will take steps to improve environmental protection, use sustainable business processes and practices that minimize waste, prevent pollution, and dispose of waste safely and responsibly.
- Our facilities will be operated in an environmentally friendly and socially responsible manner and to reduce waste, emissions and discharges from our operations.

The success of the Rockpoint Health, Safety & Environmental program depends on the adherence and cooperation of all Rockpoint employees and contractors. We must all strive to protect the health and safety of ourselves, fellow workers, general public and the environment.

*No job is so important that we cannot take the time to do it safely.*

A handwritten signature in black ink, appearing to read 'Simon Dupéré', is written over a horizontal line.

Simon Dupéré  
President & Chief Executive Officer  
Rockpoint Gas Storage  
March 2019

## **ATTACHMENT C**





# HEALTH, SAFETY & ENVIRONMENTAL POLICY

## HSE Commitment

We at Rockpoint Gas Storage (Rockpoint) are committed to working in a responsible manner, one that prioritizes the well-being and protection of our workers, the public and the environment.

We will operate our facilities in a manner that respects the health and safety of our employees, contractors, customers, communities and the environment in which we operate. Rockpoint will ensure that:

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- Personnel are available to provide the resources and guidance necessary for continuous improvement to health, safety and environmental procedures.
- Our employees are provided with the tools and training necessary to allow them to conduct their work in a healthy, safe and environmentally productive manner.

## HSE Principles

Rockpoint believes that the health, safety and wellbeing of our employees, contractors, customers and the public are the highest priority. It is our goal and objective to operate our business in such a way as to prevent harm to people and to protect the environment. We will comply with all applicable health, safety and environmental laws and regulations. It is the expectation that all workers, on Rockpoint work sites, adhere to company health, safety and environmental practices as well as applicable government laws and regulations. We will not jeopardize or compromise our HSE principles for profit or production.

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***No job is so important that we cannot take the time to do it safely.***

**Tobias (Toby) McKenna**  
**Chief Executive Officer**  
**Rockpoint Gas Storage**  
**December 2020**