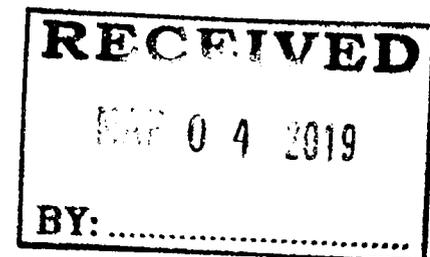


CITY OF
LONG BEACH
ENERGY RESOURCES



2400 EAST SPRING STREET • LONG BEACH, CA 90806
(562) 570-2000 • www.longbeach.gov

CERTIFIED MAIL RETURN RECEIPT REQUESTED

March 4, 2019

Mr. Chris Hoidel
Acting Director, Western Region
PHMSA, Office of Pipeline Safety
12300 W. Dakota Ave., Suite 110
Lakewood, Colorado 80228

Re: CPF 5-2019-0009M

Dear Mr. Hoidel:

The City of Long Beach Energy Resources Department (LBER), formerly identified as Long Beach Gas & Oil, has received your February 7, 2019 letter regarding NOTICE OF AMENDMENT (NOA), resulting from the July 16 through 20, 2018 Pipeline Hazardous Materials Safety Administration (PHMSA) Inspection of LBER procedures for operations and maintenance (O&M) of its natural gas distribution system.

In accordance with Title 49 Code of Federal Regulations (CFR) 190.237 [Amendment of plans or procedures], LBER is providing the following response to PHMSA's alleged inadequacies within LBER's plans or procedures. This letter is to identify the CPUC inadequacies and recognize the three Probable Violations referred in the **CPF 5-2019-0010W WARNING LETTER**.

In order to fully and completely respond to the allegations of inadequacy in our Emergency Response Plan (ERP), a comprehensive revision is being undertaken.

Item 1 - §192.605(b) ["Maintenance and normal operations."]:

"The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations."

Item 1 - §192.605 (b)(2) ["Controlling corrosion in accordance with the operations and maintenance..."]:

"Specifically, the O&M Manual failed to address how to compensate for voltage (IR) drop or the use of the 100 millivolt shift criteria, when determining the adequacy of the cathodic protection being provided to buried metallic pipelines."

"LBER failed to clearly define what constitutes separately protected short sections of mains or transmission lines, or separately protected service lines."

LBER Response:

Pursuant to the Proposed Compliance Order, LBER will establish adequate procedures in our Operations Manual that defines our Corrosion program regarding the above issues. We will submit the required documentation in support of The Operations Manual (O&M), section Maintenance-4.0 Corrosion within 180 days of the final order.

Item 2 - §192.615(a)(3) ["Prompt and effective response to a notice of each type of emergency..."]:

"LBER did not establish adequate written procedures in their Emergency Response Plan (ERP) to demonstrate LBER has a prompt and effective response to a notice of emergency."

"Emergency Procedures During Normal Working Hours," failed to explain in sufficient detail how it would effectuate a prompt and effective response, with the availability of personnel, and to respond 24/7 (after normal working hours and weekends) to a gas emergency."

LBER Response:

Pursuant to the Proposed Compliance Order, LBER will submit the required documentation in support of a revised Emergency Response Plan that displays our prompt and effective response in detail within 180 days of the final order.

Item 3 - §192.615(a)(4) ["The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency"]:

LBER did not establish adequate written procedures that ensures the availability of personnel, equipment, tools and materials from all City departments, as needed at the scene of an emergency, during normal working hours and outside normal working hours/weekends.

LBER Response:

Pursuant to the Proposed Compliance Order, LBER will establish new written procedures on the availability of our personnel, equipment and tools in a revised Emergency Response Plan within 180 days of the final order.

In addition, three items were noted in the February 7, 2019 letter as warnings. LBER has initiated corrective actions to remedy the PHMSA findings.

PHMSA, Office of Pipeline Safety
March 4, 2019
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LBER respectfully submits this response for your consideration in relation to the issues identified in the Notice of Amendment.

Should you have any questions on this matter, please do not hesitate to contact me at (562) 570-2001.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Dowell". The signature is written in a cursive style with a large initial "R" and a long, sweeping underline.

Robert Dowell
Director