



CITY ADMINISTRATION DEPARTMENT
4305 Santa Fe Avenue, Vernon, California 90058
Telephone (323) 583-8811

February 25, 2022

Via E-Mail

Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 West Dakota Avenue, Suite 110
Lakewood, CO 80228

Subject: Response to Notice of Amendments 5-2021-052 and 5-2021-053

Dear Mr. Hubbard:

The City of Vernon (Vernon) would like to respond to the items listed in the Notices of Amendment (NOA) 5-2021-052 and 5-2021-053, dated December 17, 2021 and reissued on February 17, 2022 with a response deadline of February 25, 2022.

After completion of the California Public Utilities Commission (CPUC) audit performed in October of 2020, Vernon took action to update the Gas Transmission and Distribution Operations and Maintenance (O&M) manuals based on information noted during the audit, and the preliminary findings provided by CPUC. This includes rectification of the items that were noted in the aforementioned NOA's provided to Vernon in late 2021/early 2022.

NOA CPF 5-2021-052 (Gas Distribution)

Item 1: Customer Notification Process

Vernon updated its Public Awareness Plan (PA Plan), with a final revision date of February 2022. Specifically, Vernon modified Section 4 of the PA Plan to provide clarity for written public notification to new customers at least one time as required in §49 CFR 192.16. Included in the PA Plan in the Appendix is a copy of the customer notification, which includes information specific to customer requirements per §49 CFR 192.16(b). These documents are included as Appendix A to this letter.

Exclusively Industrial

Item 2: Maximum Allowable Operating Pressure Establishment

Vernon updated its primary O&M Manual in March of 2021 to include the requirements for establishment of an MAOP for both its distribution and transmission systems. The O&M Manual provides, in Section 7, a description of both the transmission and distribution systems, current MAOP, and additional information on each of the assets. Non-substantive revisions to the O&M Manual were made in September 2021. Vernon has established their MAOP based on pressure testing in accordance with 49 CFR 192.619(a)(2) and does not utilize an alternate MAOP. Vernon has developed MAOP reconfirmation procedures and is currently finalizing a review of existing documentation to determine if reconfirmation will be required for the transmission line segment of the Vernon system.

Section 7 of the most recent version of the O&M Manual, as well as the Vernon Gas MAOP Procedure (COV-OIM-031) dated September 2021 is provided as Appendix B to this letter.

Item 3: Startup and Shutdown of Distribution Piping

Vernon updated its O&M procedures to include a revised procedure for the startup and shutdown of the gas distribution system. This procedure can be found in Gas Pipeline Normal Startup and Shutdown procedure (COV-OIM-013, dated September 2021).

This procedure is included as Appendix C to this letter.

NOA CPF 5-2021-053 (Gas Transmission)**Item 1: Maximum Allowable Operating Pressure**

Vernon updated its primary O&M Manual in March of 2021 to include the requirements for establishment of an MAOP for both its distribution and transmission systems. The O&M Manual provides, in Section 7, a description of both the transmission and distribution systems, current MAOP, and additional information on each of the assets. Non-substantive revisions to the O&M Manual were made in September 2021. Vernon has established their MAOP based on pressure testing in accordance with 49 CFR 192.619(a)(2) and does not utilize an alternate MAOP. Vernon has developed MAOP reconfirmation procedures and is currently finalizing a review of existing documentation to determine if reconfirmation will be required for the transmission line segment of the Vernon system.

Section 7 of the most recent version of the O&M Manual, as well as the Vernon Gas MAOP Procedure (COV-OIM-031) dated September 2021 is provided as Appendix B to this letter.

Item 2: Confirmation of MAOP of a Pipeline Segment due to Class Change

Vernon updated its O&M procedures to clarify the requirement for the confirmation or revision of the MAOP of a pipeline segment within 24 months of the identification of a class change. This

requirement can be found in Section 4.3 of the Vernon Gas Pipeline Class Location Survey and Determination procedure (COV-OIM-026, dated September 2021).

A copy of this procedure is included as Appendix D to this letter.

The City of Vernon Gas Division appreciates the opportunity to respond to the preliminary Notice of Amendment findings, and requests consideration for each of the findings as per the information above. Please contact Dan Cordova, Gas Superintendent at dcordova@cityofvernon.org for any questions or concerns. Thank you.

Regards,

A handwritten signature in blue ink, appearing to read "Carlos R. Fandino, Jr.", is positioned above the printed name.

Carlos R. Fandino, Jr.
City Administrator

Attachments: Appendices A-D

c: Angela Kimmey, Deputy City Administrator
Dan Cordova, Gas Superintendent
Todd Dusenberry, Assistant General Manager
Jason Dunphy, General Engineer, PHMSA