



SENT VIA EMAIL, and CERTIFIED MAIL, RETURN RECEIPT REQUESTED

December 22, 2023

Dustin Hubbard
Director, Western Region, Office of Pipeline Safety
Pipeline and Hazardous Material Safety Administration
12300 W. Dakota Avenue, Suite 110
Lakewood, CO 80228

Re: Notice of Amendment; CPF 5-2023-051-NOA

Dear Mr. Hubbard:

This letter responds to the Pipeline and Hazardous Material Safety Administration's (PHMSA) Notice of Amendment (CPF 5-2023-051-NOA) dated October 27, 2023, resulting from the PHMSA inspection conducted by the California Public Utilities Commission (CPUC) on August 15 through August 19, 2022.

The CPA has responded and amended its Operation, Inspection, and Maintenance Manual procedures, pursuant to section 190.206, "Amendment of plans or procedures", regarding the following items identified in PHMSA's CPF 5-2023-051-NOA Notice of Amendment:

Item 1. 192.605 Procedural manual for operations, maintenance, and emergencies.

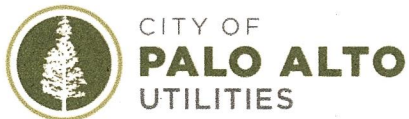
- (1) CPA's procedures were inadequate to ensure the safe operations of a pipeline facility. Specifically, CPA's Operations and Maintenance (O&M) manual does not contain procedures for the maintenance and calibration of equipment used in joining plastic pipe.

CPA Response (Item 1):

The CPA's Operations, Inspection, and Maintenance Manual (O&M) identifies who is qualified to perform fusions and how often those individuals are qualified, but it does not address that fusion equipment will be maintained and calibrated in accordance with the manufacturer's recommendation.

The CPA has amended O&M section 4.8 (Plastic Fusion Procedure) to include maintenance and calibration requirements per the manufacturer's recommendation of fusion equipment and a reference to Appendix A09 (Plastic Fusion Equipment Maintenance & Calibration) (See amended O&M section 4.8, enclosed).

Item 2. 192.616 – Public Awareness



- (1) CPA's procedures were inadequate to ensure the safe operations of a pipeline facility. Specifically, the CPA Public Awareness Program fails to consider or define use of relevant factors listed in API RP 1162 Section 6.2 IBR2. CPA must amend its Public Awareness Program to consider and define use of relevant factors listed in API RP 1162 Section 6.2.

CPA Response (Item 2):

The CPA develops its Public Awareness Plan and performs subsequent periodic program evaluations that assess relevant factors included in Section 6.2 of API 1162 along the pipeline route to consider what components of the Public Awareness Plan should be enhanced.

The CPA has amended its Public Awareness Plan to describe the CPA's consideration of the factors in Section 6.2 of API 1162. (See the subsection titled "Enhanced Outreach Factors" in the amended Public Awareness Plan, enclosed).

In response to the items listed in PHMSA's CPF 5-2023-051-NOA Notice of Amendment, CPA has made the foregoing amendments to the O&M. All amendments are reflected in the documents enclosed.

Please do not hesitate to contact me at 650-496-6981 or Dean.Batchelor@cityofpaloalto.org if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Dean Batchelor". The signature is fluid and cursive, with a long horizontal line extending from the end.

Dean Batchelor
Director of Utilities