Island Energy
energy solutions for Mare Island

22 March 2024

Mr. Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
US Department of Transportation
12300 W. Dakota Ave.
Lakewood, CO 80228

Subject: 2023 Island Energy CPUC / DOT Gas Distribution System Audit

Regarding: Notice of Amendment dated March 4, 2024
CPF 5-2024-012-NOA

Dear Mr. Hubbard,

Island Energy is in receipt of and has reviewed the subject "Notice of Amendment", which is included here for reference as Attachment A.

In summary:

On July 10th through 26th, 2023, representatives of the California Public Utilities Commission (CPUC) on behalf of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected the Pittsburg Power Company (Island Energy) natural gas distribution system (Island Energy) on Mare Island in Vallejo, California.

As a result of the inspection, PHMSA identified what it determined to be inadequacies within Island Energy's gas system plans or procedures. Our responses follow:

1. **§ 192.16 Customer Notification.**

   The identified issue was that the current Customer Notification form did not contain language advising the customer of their obligation to monitor and repair their facilities as might be needed, and to locate facilities prior to excavation.

   The current notification form does contain such language and is attached as Exhibit 1-1. However, we have expanded and revised the form to provide additional clarity on the Customer's responsibilities for Customer facilities. The revised form is attached as Exhibit 1-2.

2. **§ 192.281 Plastic Pipe.**

1) It was identified that within the O&M Manual butt-fusion weld steps were included, but the use of a "facing tool" was not mentioned. Island Energy does employ a calibrated facing tool for plastic pipe butt-fusion welds as a standard practice.

   O&M Manual section 30.5.4 has been revised to include a specific reference to the application of a calibrated facing tool when performing-butt fusion welds and is included here as Exhibit 2-1.

2) It is noted that O&M Manual section 30.5.7 did not provide information on the electrofusion process itself.

   O&M Manual section 30.5.7 has been updated to include an explanation of the electrofusion process:

   "Electrofusion is a method of joining MDPE, HDPE and other plastic pipes using special fittings that have built-in electric heating elements which are used to melt and weld the joint together.

   The pipes to be joined are cleaned, faced and inserted into the electrofusion fitting (with a temporary clamp if required) and a voltage (typically 40v) is applied for a fixed time depending on the pipe fitting in use. The built in heater coils then melt the inside of the fitting and the outside of the pipe wall, which weld together producing a very strong homogeneous joint. The assembly is then left to cool for a specified time – usually when cool to the touch."

   Refer to Exhibit 2-2 for the O&M Manual section 30.5.7 update.

3. **§ 192.513 Test Requirements For Plastic Pipe.**

Island Energy's plastic pipe test requirements state that plastic pipe will be tested at not less than 60psig. As Island Energy's gas system's maximum allowable operating pressure (MAOP) is 50psig, testing at 60psig is inconsistent with § 192.513.

O&M Manual section 18.5.2 has been corrected to reflect a plastic pipe test pressure of 1.5 x MOAP, or 75psig. Refer to Exhibit 3-1.

4. **§ 192.605 Procedural Manual For Operations, Maintenance and Emergencies.**

The identified issue is that Island Energy's O&M Manual did not contain procedures for the maintenance and calibration of equipment used in joining plastic pipe by heat fusion.

Island Energy has added the following procedural language to our O&M Manual section 30.5.8. Refer to Exhibit 2-2.

"Electrofusion Machine Maintenance

Upon each use, the electrofusion device and its appurtenances will be inspected for loose connections, damaged or frayed wires, and processor unit operability. Should a maintenance item be identified, it is to be remedied prior to device operation (i.e., cable, connector replacement or other).

Electrofusion Machine Calibration

Island Energy employs electrofusion devices that provide the operator with control screen notifications when the control unit (electrofusion processor) is due for calibration.

The electrofusion processor control unit will then be sent to a certified electrofusion calibration vendor, and a calibration report will be issued. In addition to the electrofusion processor device notification, the certification report will include notice of next calibration – typically two (2) years. The report is to be retained and filed, and the next expected certification date is to be placed on the recurring maintenance calendar."

Please contact me directly with any questions or should PHMSA require additional information.

Sincerely,

Douglas W. Buchanan

Douglas W. Buchanan, PE
Power Company Manager
Pittsburg Power Company – Island Energy

Phone: (925) 252-4185
Email: dougbuchanan@pittsburgca.gov

Cc: Garrett Evans