



April 28, 2016

Mr. Saurabh Vasudeva
U.S. Department of Transportation
PHMSA
Office of Acquisition Services (PHA-30)
1200 New Jersey Avenue, SE, E22-305
Washington, D.C. 20590

Ms. Karen Lynch
U.S. Department of Transportation
PHMSA
Office of Pipeline Safety (PHP-20)
1200 New Jersey Avenue, SE, E22-230
Washington, D.C. 20590

Dear Mr. Vasudeva and Ms. Lynch,

On behalf of the BlueGreen Alliance Foundation (BGAF), I'm pleased to submit a progress report for the \$88,600 technical assistance grant awarded September 18, 2015 (DTPH5615GPPT02).

The primary goal of BGAF's RECAP California project is to educate labor and community partner organizations about pipeline safety – especially those directly linked to the gas sector – and to engage them in collaborative efforts to improve the identification and prevention of hazardous conditions.

Since October 2015, we have engaged in the following activities based upon the parameters established in the grant agreement:

1) Assure that members of BGAF's community/environmental partners and of BGAF's labor partners are aware of pipeline safety issues.

Beginning in October 2015 to the present, BGAF conducted outreach to state-based community, environmental and labor partners to include the district and local members of the Utility Workers Union of America (UWUA - employing approximately 4,000 gas sector workers at the Southern California Gas/So Cal Gas utility), International Brotherhood of Electrical Workers (IBEW - employing approximately 16,000 gas sector workers at the Pacific Gas & Electric/PG&E gas utility), United Association (UA - Plumbers, Pipefitters, Welders and Service Techs Union), Environmental Defense Fund (EDF), Sierra Club, Natural Resources Defense Council (NRDC), and others. This has been carried out via presentations, meetings and fact sheets outlining characteristics of California's distribution gas system, and potential repair and inspection remedies made possible by the Gas Pipeline Leak Repair and Emissions Reduction Act ('pipeline repair act').

In 2014, Governor Brown signed the pipeline repair act (also referred to its bill number, SB 1371) into law. The act compels the California Public Utility Commission (CPUC) to determine and



implement best practices for leak identification, repair, and avoidance, as well as better accounting of the climate change impact of natural gas leaks occurring throughout the distribution systems carrying gas under throughout California's cities and communities. It also gives the CPUC the authority to develop ratemaking mechanisms to fund needed repair and replacement activities.

2) Build awareness about and capacity for key constituents to identify how they can mitigate potentially hazardous conditions.

It is in the interest of workers, communities and policymakers to improve pipeline education, and broaden the base of support for pipeline safety in order to advance solutions that make natural gas systems safe. For union members in the natural gas sector, they are the 'first and worst' exposed to safety and health hazards; for communities, workers, and families, reducing the risk of damage to the environment and workplaces from explosions, air pollution and climate change impacts from natural gas leaks is a clear benefit.

BGAF convened the partners identified in section 1 to A) develop jointly-agreed upon best practices (to include more frequent pipeline inspection, improved leak classification, requiring repair in addition to leak monitoring, and improved training and safety programs), B) apprise additional stakeholders of the relevance of these practices in advancing safety and C) advance these priorities during public proceedings related to the implementation of the pipeline repair act. Key dates encompassing these activities include:

- Project kickoff - November 2015/San Francisco and San Ramon, CA. Key participants included representatives of the Utility Workers Union of America, International Brotherhood of Electrical Workers, and Environmental Defense Fund
- EPA Natural Gas Star Distribution Implementation Workshop – November 2015/Pittsburgh PA
- Pipeline Safety Trust annual meeting – November 2015/New Orleans, LA
- Best practices development meeting – December 2015/Palm Springs, CA. Second convening for representatives of the Utility Workers Union of America, International Brotherhood of Electrical Workers, and Environmental Defense Fund
- California Public Utilities Commission best practices workshop – January 2016/San Francisco, CA. Key participants include representatives/staff among the UWUA, IBEW, EDF, PG&E, So Cal Gas, Sempra Energy, Southwest Energy, Wild Goose, City of Long Beach, California Air Resources Board (CARB), CPUC
- Education and outreach phase – February 2016-present, statewide. To date more than 40 state-based groups and public officials have been engaged in meetings and ongoing education and outreach with the project team, including but not limited to: City and County of Los Angeles, City of Santa Monica, City of Garden Grove, City of Tustin,



Coalition for Clean Air, Union of Concerned Scientists, Communication Workers of America, Physicians for Social Responsibility and more.

3) Develop, propose and implement labor-community-business hazard prevention strategies in communities adjacent to distribution pipelines.

Through the project term to date, the team has identified in particular four critical best practices that warrant attention/inclusion in California leak repair policies:

- Prioritizing replacement of Aldyl-A plastic and bare steel gas mains. These mains are much more prone to leakage than advanced materials currently available for gas distribution; bare steel pipes are estimated to be 57 times more prone to leakage than protected steel mains, and Aldyl-A plastic mains often become brittle and crack well short of their anticipated service life.
- The immediate replacement of anodeless (AL) risers in less than good repair (i.e. leaking, swollen, or showing noticeable corrosion). These conditions indicate risers have lost their capacity to hold normal gas pressures and may be leaking. AL risers are typically located next to the foundation of homes, schools, hospitals and other residential and public buildings. Because they are located above a shut off or safety valve, a leak cannot be easily turned off, releasing gas within the vicinity of these buildings and serving as potential sources of ignition.
- A third of reported leaks by the public involve a Meter Set Assembly (MSA). These devices regulate and measure the volume of natural gas delivered to customers, and like risers, MSAs are typically located above ground and adjacent to the foundations of homes, schools, hospitals and other residential and public buildings. Moving forward, reported MSA leaks are recommended to be repaired the same day/within 24 hours of discovery.
- The age of the energy sector workforce is increasing much more rapidly than other sectors in the economy, a trend prevalent in California and many other states. To ensure the newer/younger generation of gas workers gains from the experience and knowledge of the previous generation before their retirement, gas utilities should incorporate comprehensive, formal training and mentorship programs that transfer best practices regarding maintenance, leak repair and keeping the public safe.

These priorities have been advanced in education efforts during the outreach phase of the project (February 2016 to present). Next steps in the collaborative process are to comprehensively quantify these best practices and identify paths forward to implementation. Materials developed to date have been disseminated to partner groups via roundtable discussions, in-person briefings, websites/blogs and email. These efforts will continue with these and additional audiences through the duration of the grant period.



The final report – synthesizing research, assessment of conditions, and recommended actions – will draw heavily from the ongoing collaborative model and is expected to be completed and widely distributed by the end of the grant period.

A broad campaign to engage community stakeholders, industry and policymakers is underway. To date, more than 40 state-based workforce, community, public health, environment & environmental justice groups, public works officials, city council members/mayors, state (and federal) policymakers, and utilities have been briefed on the progress of the CPUC's implementation of the pipeline repair act, ways these parties can engage the CPUC and public to advance safety goals, and the potential for identified best practices to improve safety.

If you have questions regarding our work to date, please don't hesitate to contact me at (202) 706-6908 or robm@bluegreenalliance.org.

Thank you again for enabling the BlueGreen Alliance Foundation to help educate our partners, policymakers, and the public about the natural gas distribution pipeline system in California. We look forward to sharing our continued progress at the conclusion of the grant period.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob McCulloch".

Rob McCulloch
Director, Infrastructure Programs