# Inspection Time



An Overview to CPUC Natural Gas and Propane Inspections

## How Are Inspections Scheduled?

- Inspections are performed on a maximum 5-year frequency.
- Starting in 2013, inspection frequency will be risk-based with a maximum 7-year frequency.
- Inspectors pick the parks that have gone the longest without an inspection.
- A letter is mailed to the park operator and park. The letter states:
  - Day and time for the inspection
  - Name of the Inspector
  - The inspector's phone number
  - The required records needed for the inspection
- Call the Inspector and verify the appointment time and park representative that will meet them.
- Inspection can occur without park representative present, but this should be avoided.

## Inspection Notice

STATE OF CALIFORNIA

PUBLIC UTILITIES COMMISSION SCE VAN NEESAVENUE SAN FRANCISCO, CA. 9+102-3256





August 12, 2009

3043 / 09-0103

NEWPORT PACIFIC 17300 RED HILL AVE., #280 IRVINE, CA 92714-5643

Dear Mobilehome Park Operator:

As required by State Law and Public Utilities Code Chapter 4, Section 4352, engineer(s) from the Utilities Safety Branch of the California Public Utilities Commission will be conducting an onsite inspection of your natural gas distribution system.

Inspector: Aimee Dalusong

Location: TAHOE VERDE M/H PARK

Between 8:00am and 9:30am on September 14, 2009

Please have a representative with the following records pertaining to the gas system available for review on the day of the inspection:

- 1. Operation and Maintenance Plan
- 2. Emergency Plan
- 3. Operator Qualification Plan
- 4. These maintenance records for the past 5 years:
  - a) Gas Leak Survey
  - b) Key Valve Maintenance
  - c) Cathodic Protection (Rectifier and pipe-to-soil reads)
  - d) Patrolling
  - e) Odorization
- 5. Map of the natural gas system
- 6. Leak Repair Records

Please inform residents of the inspection by posting the enclosed notice at a place where it will be visible to all residents.

Upon receipt of this letter, please contact me at (415) 703-2055 to confirm the date, time, name of the representative, and meeting location on the day of the inspection.

### Sincerely,

Aimee Dalusong Utilities Engineer Utilities Safety and Reliability Branch Consumer Protection and Safety Division

## Inspection Notice

STATE OF CALIFORNIA

PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA \$4102-3298





## NOTICE

PARK: TAHOE VERDE M/H PARK

DATE: September 14, 2009

TIME: Between 8:00am and 9:30am

AS REQUIRED BY STATE LAW, ONE OR MORE ENGINEERS FROM THE CONSUMER SERVICES DIVISION OF THE CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC) WILL BE CONDUCTING AN INSPECTION OF THE NATURAL GAS DISTRIBUTION SYSTEM AT THIS LOCATION ON THE ABOVE DATE AND TIME. THE RESIDENTS ARE REQUESTED TO KEEP DOGS AND/OR OTHER ANIMALS AWAY FROM THE NATURAL GAS RISERS AND/OR SUBMETERS ON THE DAY OF THE INSPECTION. THE ENGINEER(S) CAN BE IDENTIFIED BY A OFFICIAL CPUC PHOTO IDENTIFICATION CARD. THANK YOU FOR YOUR COOPERATION ON THIS MATTER.

## Preparing for the Inspection

- Make sure you have the following, at the audit:
  - Operation & Maintenance Plan
  - Emergency Plan
  - 5 years of Maintenance Records
  - Operator Qualification Plan
  - Public Awareness Plan
  - DIMP Plan
  - Map of the Gas System

### Meters are accessible

- Dogs are tied up
- Meters are not covered



## What do Inspectors look for?

- No mystery, inspectors are looking for non-compliances with:
  - Federal and state gas pipeline safety laws (49 CFR, Part 192 and GO 112-E)
- Park has a written plan for, and is following its:



- Operation and Maintenance Plan
- Emergency Plan
- Operator Qualification Plan
- PAP and semi-annual notices to customers
- DIMP

## **Inspection Form**

ype of Inspection: MHP Propane CPUC ID:		ection Report	
	HCD ID:	Inspection Date:	
Entity Name:	Tel	lephone:	
Spaces Served: Natural Gas / Propane Supplier:			
Replacements / expansions since last audit? Yes No	Replacement / ex	xpansion date:	
Requirements	Circle one	Comments	
1. O&M Plan within compliance - 192.605(b)	Y N		
2. O&M Plan reviewed and/or updated annually - 192.605(a)	Y N		
3. Current map of the distribution system - 192.605(b)(3)	Y N		
I. O&M Plan being followed - 192.13(c)	Y N		
Written Emergency Plan within compliance - 192.615(a)	Y N		
. Public Awareness Program within compliance - 192.616	Y N		
. Is Cathodic Protection (CP) installed? If CP is not installed, explain why	Y N		
B. CP system test/survey conducted as required - 192.465(a)	Y N N/A		
Rectifier(s) monitored / maintained within compliance - 192.465(b)	Y N N/A		
Prompt action taken to correct CP deficiencies - 192.465(d)	Y N N/A		
Leak surveys conducted as required - 192.723 or O&M Plan 192.13(c)	YN		
2. Emergency (key) valves maintained - 192.747(a) or O&M Plan-192.13(c)	Y N		_
Is there a written Operator Qualification Program? (Fill out OPS OQ Form)	YN		
Annual Report Current - PU Code 4354 (MHP), PU Code 4454 (Propane)	Y N		
<ul> <li>Propane surcharge payment current - PU Code 4458</li> </ul>	Y N N/A		
dditional violations or comments:			
CPUC Representative Operator Repres	entative (print)	Operator Representative's Signal	ture
			ture
Instructions: If a violation has been cited, please submit to the days of receipt of this report. Mail your response to:		plan for remedial action within 30	ture
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Form MHP-11 contains 4 parts:

- Park Information
- 15 Yes/No Question
- Additional Violations
- What to do if a violation is cited

### **Last Part of Inspection Form**

CPUC Representative	Repesentative (print name)	Representative's Signature		
Instructions: If a violation has been cited, please submit to the Commission your plan for remedial action within 30				
days of receipt of this report. Mail your response to:				
CPUC	CPUC	CPUC		
Attention: CPUC Representative	Attention: CPUC Representative	Attention: CPUC Representative		
505 Van Ness Ave., Room 2-D	515 L Street, Suite 1119	320 West 4th Street, Suite 500		
San Francisco, CA 94102	Sacramento, CA 95814	Los Angeles, CA 90013		
California Public Utilities Code sections 4357 (MHP) and 4457 (Propane) provide that a violation of the rules or orders				
of the Commission is a misdemeanor punishable by a fine up to \$1,000/day, not to exceed \$200,000 for a single				
violation or a series of related violations.				
Distribute: Original - CPUC	Green - Owner/Operator	Yellow - Staff		

- The Engineer will direct the park representative that the park has 30 days to submit a remedial action plan (in writing).
  - The Park must correct all violations noted by the inspector, but all violations do not have to be corrected within the 30 days.
  - The engineer will evaluate the response, contact you with follow up questions or comments, and finally close the inspection.

## Failure to Correct Violations

If the park fails to correct any of the violations noted during the inspection the park is subject to fines.



## CPUC Rulemaking (R.11-02-018)

- In 2011, the CPUC opened R.11-02-018 to examine what the CPUC can and should do to encourage replacement of gas and electric master-meter/submeter systems in mobilehome parks by direct utility service (i.e., SoCalGas, SDG&E, SCE, PG&E, Southwest Gas, Pacific Corp.,etc.)
- This proceeding is underway, with hearings to be held soon; however, no decision has yet been rendered by the CPUC
- This topic being covered by another WMA presenter during this convention.

Any Questions?

