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TO: California State Senate, Subcommittee on Gas, Electric, and Transportation Safety of the Committee on Energy, Utilities and Communications

FROM: Carl Weimer, Special Projects Advisor, Pipeline Safety Trust

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Comments for the October 13, 2020 hearing on Gas Safety Retrospective: Decade Since San Bruno

Chairman Hill and members of the committee, we appreciate the opportunity to comment on this timely topic.

The Pipeline Safety Trust was formed as part of the legal settlement by the federal courts for the 1999 pipeline tragedy in Bellingham, Washington where the failure of a pipeline released nearly a quarter million gallons of gasoline into a salmon stream. When the gasoline ignited three young men and two boys playing in a park were killed, and every living thing in that salmon stream for the two miles that stream flowed through our city to the ocean was killed. Since that time the Pipeline Safety Trust has tried to live up to the instructions from the court to hold both pipeline companies and regulators accountable, and work with whoever we can find to improve the safety of pipelines in this country. That is why we are providing these short comments in the hope they can help you in your similar quest, and to thank you for your efforts of the past ten years.

One thing we have learned since the tragedy in our own community is that pipeline tragedies are still too frequent. We have appeared in front of Congress numerous times after other tragedies and pleaded for better regulations, and that state and federal regulators be given more resources and authority. Unfortunately, at the federal level the pipeline safety statutes are undermined by clauses that make it difficult, or outright prohibit passing rules that would help prevent tragedies such as San Bruno. At the federal level passing requirements for NTSB recommendations such as automated shutoff valves is nearly impossible due to unique cost-benefit analysis requirements that favors keeping costs to pipeline companies low while discounting possible tragic effects on communities if a failure were to occur. The federal statutes also prohibit new rules from requiring a change to the physical construction or design of a pipeline that already exists at the time the new rules are released.

Fortunately, states can pass stronger regulations on the intrastate pipelines they oversee, and we are very pleased with the efforts in California that now require automated shutoff valves, better risk analysis, verification of operating pressures based on real information, leak repairs, etc. Thank you for accomplishing for the people of California what the federal government has failed to do for the rest of the country.

We also are pleased with your push to clearly measure pipeline company's implementation of safety management systems and the associated safety culture of companies. These are difficult things to measure, but we support your efforts to find metrics that will indicate whether companies are truly operating more safely, or if they are just investing in good sounding public relations hype. In the years just before the San Bruno tragedy PG&E was often spotlighted as a progressive safely run company, but the explosion and fires in San Bruno exposed the truth that PG&E had some serious deficiencies, and the regulators appear to have been fooled by the hype and failed to identify and correct the deficiencies before the tragedy occurred.

With that in mind, below we would like to share the two charts pulled from PHMSA's data yesterday that show while the state has implemented many very exciting and progressive rules, the largest natural gas companies in the state still have a ways to go to turn around what the public sees as the most important safety metric of them all – a reduction in the number of pipeline failures impacting people and the environment. The charts below provide a comparison between PG&E and Sothern California Gas with other similar sized pipeline companies in the country, and as you will see these comparative metrics show that both companies have room for improvement in the critical metric of significant pipeline incidents compared to the oft claimed goal of zero incidents, and even compared with many of their peers natural gas pipeline companies. If the companies, or their regulators, cannot explain these troubling metrics, some of which are trending in the wrong direction, then we would suggest their risk analysis, and safety programs have still not been completely corrected.

Gas Transmission Significant Incidents per 1000 Miles – Operators with 5,000 or more miles*						
Data Source: US DOT Pipeline and Hazardous Materials Safety Administration - 10/11/20						
Operator ID	Operator Name	10 Year Average (incidents per 1,000 miles)	5 Year Average (incidents per 1,000 miles)	10 Year Significant Incident Count	5 Year Significant Incident Count	2019 Miles
15007	PACIFIC GAS & ELECTRIC CO	0.57	0.58	35	19	6,498
602	ENABLE GAS TRANSMISSION, LLC	0.38	0.44	23	13	5,890
2616	COLUMBIA GAS TRANSMISSION, LLC	0.27	0.36	29	19	10,732
19570	TRANSCONTINENTAL GAS PIPE LINE COMPANY	0.28	0.36	23	15	8,574
31711	SOUTHERN STAR CENTRAL GAS PIPELINE, INC	0.36	0.34	21	10	5,805
19160	TENNESSEE GAS PIPELINE COMPANY	0.31	0.34	37	20	11,761
19235	TEXAS EASTERN TRANSMISSION, LP	0.20	0.31	17	13	8,408
31728	GULF SOUTH PIPELINE COMPANY, LLC	0.30	0.30	20	10	6,512
19270	TEXAS GAS TRANSMISSION, LLC	0.23	0.27	14	8	5,949
13120	NATURAL GAS PIPELINE CO OF AMERICA (KMI)	0.14	0.22	13	10	9,045
18484	SOUTHERN CALIFORNIA GAS COMPANY	0.26	0.17	9	3	3,385
405	ANR PIPELINE CO	0.20	0.15	19	7	9,255
18516	SOUTHERN NATURAL GAS CO	0.16	0.14	11	5	7,009
2564	COLORADO INTERSTATE GAS CO	0.13	0.13	8	4	6,155
13750	NORTHERN NATURAL GAS CO	0.16	0.12	23	9	14,672
32099	ENERGY TRANSFER COMPANY	0.13	0.11	9	4	7,751
5304	FLORIDA GAS TRANSMISSION CO	0.19	0.07	10	2	5,350
31978	ATMOS PIPELINE - TEXAS	0.07	0.07	4	2	5,684
15105	PANHANDLE EASTERN PIPELINE CO	0.10	0.06	6	2	6,336
4280	EL PASO NATURAL GAS CO	0.09	0.06	9	3	10,123

* Southern California Gas has fewer transmission miles than these other companies, and is shown for comparison

Gas Distribution Significant Incidents per million Miles – Operators with 25,000 or more miles						
Data Source: US DOT Pipeline and Hazardous Materials Safety Administration - 10/11/20						
Operator ID	Operator Name	10 Year Average (incidents per million miles)	5 Year Average (incidents per million miles)	10 Year Incident Count	5 Year Incident Count	2019 Miles
31348	ATMOS ENERGY CORPORATION - MID-TEX	56.88	78.78	24	17	46,817.75
2596	COLUMBIA GAS OF OHIO INC	45.48	66.95	19	14	42,084.47
2748	CONSUMERS ENERGY CO	49.08	62.27	25	16	52,070.81
12408	DTE GAS COMPANY	40.41	60.16	16	12	40,760.61
15007	PACIFIC GAS & ELECTRIC CO	47.48	51.85	37	20	77,152.85
792	ATLANTA GAS LIGHT CO	32.71	46.15	21	15	66,084.84
18484	SOUTHERN CALIFORNIA GAS CO	31.88	45.58	32	23	101,486.40
15931	PUBLIC SERVICE CO OF COLORADO	37.81	40.12	13	7	35,297.40
22189	PUGET SOUND ENERGY	31.38	38.91	8	5	26,142.47
12350	CENTERPOINT ENERGY MINNESOTA GAS	31.7	30.92	8	4	26,159.50
15359	BLACK HILLS ENERGY	30.25	29.94	8	5	41,247.00
22182	WASHINGTON GAS LIGHT CO	26.08	29.35	7	4	27,657.41
15952	PUBLIC SERVICE ELECTRIC & GAS CO	40.27	28.44	14	5	35,283.58
12876	DOMINION ENERGY UTAH/WYOMING/IDAHO	13.51	27.02	4	4	29,847.54
32513	AMEREN ILLINOIS COMPANY	16.59	26.36	5	4	31,190.16
18536	SOUTHWEST GAS CORP	16.80	25.97	9	7	54,784.70
15518	PIEDMONT NATURAL GAS CO INC	11.30	22.60	5	5	44,785.62
603	CENTERPOINT ENERGY RESOURCES CORP.	16.96	19.5	5	3	31,118.50
13710	NORTHERN ILLINOIS GAS CO	20.48	15.82	13	5	63,508.97
4499	CENTERPOINT ENERGY RESOURCES CORP	15.45	14.81	10	5	68,497.20
4060	DOMINION ENERGY OHIO	25.64	12.85	8	2	31,121.83
13730	NORTHERN INDIANA PUBLIC SERVICE CO	8.99	5.84	3	1	34,392.93

Finally we would like to leave you with an additional idea that we think has been greatly overlooked over the past decade. The people of California have lost trust in some of your pipeline companies and also in the state’s ability to adequately regulate those companies to ensure public safety. While we applaud so many of the nationally leading efforts that the state legislature, pipeline companies, and regulators in California have undertaken since the San Bruno tragedy, public trust will be hard to rebuild without a clearly independent, knowledgeable group that represents the public interest. Such a group could provide some public review, voice and accountability to the California pipeline safety system. The CPUC Office of Safety Advocate was a good step in this direction, but it sunset far too soon, and it is still unclear to us how that work will move forward under new CPUC organizations. We believe even a more independent voice for public safety in the form of a well chosen and staffed citizen advisory committee, or a well funded safety organization similar to the Pipeline Safety Trust but focused on the ample California safety issues, would be the quickest way to rebuild public trust. A small percentage of the hundreds of millions of dollars being spent because of safety failures could fund such an effort to provide accountability to rebuild trust and push for continuous movement toward even safer pipelines.

If you have any questions regarding our comments, or if we can be of assistance in any way, please let us know.