

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

In the Matter of the Request of the Division of Public Utilities for Enforcement Action Under the Natural Gas Pipeline Safety Act against Questar Gas Company)) DOCKET NO. 07-057-04
In the Matter of the Miscellaneous Correspondence and Reports Regarding Gas Utility Services; 2014)) DOCKET NO. 14-999-02
ORDER ON SAFETY TRAINING REPORTING

ISSUED: August 18, 2014

On January 21, 2014, Questar Gas Company (“Questar” or “Questar Gas”) filed a Confidential Semi-Annual Safety Training Report (“Report”) with the Public Service Commission of Utah (“Commission”). Pursuant to the Commission’s November 20, 2008, Order Approving Settlement Stipulation (“Stipulation”) in Docket No. 07-057-04 (“Order”), the Report presents a summary of the safety training activities conducted by Questar in 2013.

On April 17, 2014, the Commission issued an action request to the Division of Public Utilities (“Division”) requesting a review and evaluation of the Report for compliance with the Order. On July 11, 2014, the Division filed a response to the action request.

DIVISION COMMENTS

The Division’s July 11, 2014, action request response includes a review of the provisions of the Stipulation. With the exception of the requirement to file semi-annual safety training reports, the Division concludes Questar has complied with the provisions of the Stipulation, albeit later than the Division expected for some requirements.

Paragraph 14 of the Stipulation requires Questar to increase the total number of safety training hours it provides to its employees in total by 10 percent in 2008 over the hours provided to its employees in 2006. Pertaining to the semi-annual training reporting requirement specified in Paragraph 17 of the Stipulation, the Division observes reports for the second half of 2009, 2010, and 2011, were not filed with the Commission, however, that data has since been provided to the Division. The Division maintains the reports filed in 2008, 2009, 2012, and 2013, demonstrate Questar's training levels increased from 2006 as required. Therefore, the Division concludes the semi-annual safety training report is no longer relevant.

The Division, however, believes the intent of the Order pertaining to the semi-annual safety training report was for Questar to provide information to the Commission and the Division demonstrating it was training its operational employees properly and completely. For this purpose, the Division states the current reports are inadequate and incomplete. In addition, the Division observes the training hours in the Report are understated by nearly 10,000 hours that were apparently lost, miscalculated, or mischaracterized. The Division also observes that areas of training vary from year to year and notes other inconsistencies in the level of training provided to its operations employees.

The Division notes it does not currently use the general information contained in the Report, instead relying on its Pipeline Safety Section to monitor Questar's compliance with federal safety training requirements. For Questar to demonstrate proper and complete training of its employees, the Division believes it would be reasonable for Questar to produce a more detailed report including training statistics such as attendance rosters including the date and location of training, names of presenters, and topics discussed.

In summary, the Division maintains the semi-annual safety training report fulfilled its stated purpose of demonstrating Questar's training levels increased from 2006. Further, the Division does not use the general information contained within the report to determine adherence with safety training requirements. Therefore, the Division recommends elimination of the semi-annual safety training report requirement contained in the Stipulation.

DISCUSSION

We cannot overstate the importance of Questar's training and awareness activities with regard to the safety of both Questar's employees and the public. We recognize and commend Questar's safety training and awareness efforts, its contributions to the Blue Stakes program, and its efforts at exceeding minimum regulatory requirements and prevailing industry practices. Based on the concerns of the Division, we request that Questar provide some additional information.

First, the Division mentions several areas in which Questar failed to fulfill Stipulation requirements or took longer than the Division expected to fulfill certain conditions. We request that Questar respond to these issues raised by the Division and explain the processes it uses to ensure timeliness of compliance.

Second, the Division discusses the lack of specificity of detail in the Report. We refer to Paragraph 17 of the Stipulation which states the semi-annual safety training reports, "will explain the types and hours of training conducted both in-house at Questar Gas and in conjunction with the Blue Stakes Center of Utah." We find the level of detail in the report adequate based upon Paragraph 17; however, we note that many of the activities listed in the report could be classified as safety awareness rather than safety training. While both are

important, it is unclear how Questar distinguishes the former from the latter. We therefore request that Questar file an explanation of how it provides and tracks, on an individual basis, safety training necessary to demonstrate compliance with all U.S. Department of Transportation requirements, Occupational Safety and Hazard Administration training, and any other safety training requirements. This should include any applicable computer-based training.

Third, we are concerned by the Division's conclusion that the training referenced in the Report is in error by over 10,000 hours. We direct Questar to file a corrected report or an explanation if Questar disagrees with the Division's conclusion.

Fourth, the Report states Questar is required by the Department of Transportation to review its operating procedures once every three years. We note this requirement may contradict 49 C.F.R. 192.605(a), incorporated by U.C.A. § 54-13-2 and R746-409, which requires a procedural manual for operations, maintenance, and emergencies to be reviewed and updated by a pipeline operator at intervals not exceeding 15 months, but at least once each calendar year. We request that Questar file an amended report correcting or explaining the apparent discrepancy.

Finally, the Division recommends elimination of the semi-annual safety training reporting requirement. We request that Questar respond to this recommendation.

ORDER

Questar shall file the above information within 45 days of the date of this Order.

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DATED at Salt Lake City, Utah, this 18th day of August, 2014.

/s/ Ron Allen, Chairman

/s/ David R. Clark, Commissioner

/s/ Thad LeVar, Commissioner

Attest:

/s/ Gary L. Widerburg
Commission Secretary

DW#259808

CERTIFICATE OF SERVICE

I CERTIFY that on the 18th day of August, 2014, a true and correct copy of the foregoing was delivered upon the following as indicated below:

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