



**Lodi Gas Storage, L.L.C.**  
**A Rockpoint Gas Storage Company**  
PO Box 230, Acampo CA 95220-0230  
T 209.36839277 F 209.368.9276  
rockpointgs.com

May 18, 2022

Terence Eng, P.E.  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue, 2<sup>nd</sup> Floor  
San Francisco, CA 94102-3298  
[terence.eng@cpuc.ca.gov](mailto:terence.eng@cpuc.ca.gov)

*VIA ELECTRONIC MAIL*

**RE: Operator Qualification and Anti-Drug & Alcohol Misuse Program Inspections  
of Lodi Gas Storage**

Dear Mr. Eng:

Lodi Gas Storage, L.L.C. (LGS) submits this written response to the Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission). On behalf of the SED, Victor Muller, Anthony Phu, James Zhang, and Andrea Garcia Ruvalcaba conducted a General Order 112-F inspection of LGS's Operator Qualification and Anti-Drug & Alcohol Misuse programs from February 28, 2022 through March 4, 2022. The inspection findings identified by SED were provided to LGS on April 18, 2022. LGS addresses the inspection findings as noted by SED in the "Post-Inspection Written Preliminary Findings" in the following enclosed documents:

- **Attachment #1** – LGS Responses to "Post-Inspection Written Preliminary Findings"
- **Attachment #2** – Excerpts from Anti-Drug and Alcohol Misuse Plan highlighting revisions to address EAP methods, procedures, and updated EAP provider
- **Attachment #3** – Excerpt from Anti-Drug and Alcohol Misuse Plan highlighting revisions to address priority of testing
- **Attachment #4** – Excerpt from Anti-Drug and Alcohol Misuse Plan highlighting revisions to address reporting of test results (MIS)
- **Attachment #5** – Excerpt from Anti-Drug and Alcohol Misuse Plan highlighting revisions to address reasonable cause drug testing and reasonable suspicion alcohol testing
- **Attachment #6** – Excerpt from Anti-Drug and Alcohol Misuse Plan highlighting revisions to address reporting of drug test results

If you have any questions, or require more information, please contact me at [greg.clark@rockpointgs.com](mailto:greg.clark@rockpointgs.com) or at (209) 368-9277 x21.

Sincerely,



Gregory N. Clark  
Compliance Manager

Enclosures

cc: File #S3.03  
C. Almengor ([claudia.almengor@cpuc.ca.gov](mailto:claudia.almengor@cpuc.ca.gov))  
J. McMillan ([jason.mcmillan@cpuc.ca.gov](mailto:jason.mcmillan@cpuc.ca.gov))  
V. Muller ([victor.muller@cpuc.ca.gov](mailto:victor.muller@cpuc.ca.gov))  
D. Lee ([dennis.lee@cpuc.ca.gov](mailto:dennis.lee@cpuc.ca.gov))  
A. Anderson, M. Fournier, K. Peterson (via e-mail)