

AUC Consultant Review of the AltaGas Utilities Inc. (AUI) Emergency Management Guide and Emergency Management Plan

Recommendations and AUI Management Responses

I. CSA-Z1600-08 Review – Table 1

4.4.6 Records Management

EMG 1.8 “documents shall be properly retained” no indication of procedure for document retention.

Management Response (a)

AUI will complete Appendix E with excerpts from ADM-057 - Records Retention and Disposition Schedule.

Please refer to Appendix 1- ADM-057 - Records Retention and Disposition Schedule.

Note: EMP Appendix “E” not complete.

Management Response (b)

AUI uses an electronic Workforce Management System (Maximo) to collect all Emergency Response records. Please see Appendix 6 for an example of a Maximo Report which is indicative of the forms used to collect Emergency Response data.

No evidence of a records index.

Management Response (c)

Please refer to Appendix 1- ADM-057 Records Retention and Disposition Schedule, Section 10.0.

6.2 Resource Management

EMP Section 6.0 provides consideration of examples but does not provide for specific resources needed to ensure appropriate response for the identified hazards.

Management Response (a)

AUI maintains a list of Internal and External resources in a network database accessible to all AUI employees. Please refer to Appendix 2 – District Emergency Contacts for a copy of the Leduc Region data, which is representative of the data for all AUI operating regions.

EMG 1.7 makes reference to “Emergency Reporting Card” document not provided or reviewed.

Management Response (b)

See Appendix 3 - AUI Emergency Reporting Chain Card.

6.3 Mutual Aid/Mutual Assistance

No evidence of mutual aid agreement

Management Response

AUI has a Mutual Aid Agreement with all Canadian Gas Association members. Please refer to Appendix 4 - CGA Mutual Assistance Agreement 2009.

6.6 Communications and Warning

No evidence of EMP Appendix F

No evidence of methods or procedures of Crisis Communications Group.

Management Response (a)

See Appendix 5 – Crisis Communications Matrix.

Guidelines for communication systems other than cellular or land phones.

Management Response (b)

Section 3.10 of the Plan includes loss of cellular and landline communication guidelines. AUI also maintains satellite phones in key locations for use in remote areas or when other communication methods fail.

No evidence of methods or procedures of “appropriate public information actions.”

Physical communication resources are referenced as guidelines only and may not physically exist.

Management Response (c)

AUI assures the AUC it has physical communication resources, as evidence by the phone numbers listed on its District Emergency Contacts and Emergency Reporting Chain Card. See Appendix 2 and 3.

No evidence of methods or procedures for public warning.

No evidence of policy, method or procedures for public awareness program.

Management Response (d)

AUI will add procedures for public awareness and public warning to its EMP, and also provide appropriate instructions and contact information on its website and social media accounts during emergency events.

II. CSA-Z731-03 – Table 2

4.8 Resources

EMP Section 6.0 provides consideration of examples but does not provide for specific resources needed to ensure appropriate response for the identified hazards.

Management Response

AUI maintains a list of Internal and External resources in a network database accessible to all AUI employees. Please refer to Appendix 2 – District Emergency Contacts for a copy of the Leduc Region data, which is representative of the data for all AUI operating regions. AUI will expand its District

Emergency Contacts list to include, where available, contact information for the examples provided in EMP Section 6.0.

4.10 Mutual Aid Agreement

No evidence of mutual aid agreement

Management Response

AUI has a Mutual Aid Agreement with all Canadian Gas Association members. Please refer to Appendix 4 - CGA Mutual Assistance Agreement 2009.

4.11 Contact List

EMP Section 6.0 provides consideration of examples but does not provide for specific resource names and contacts needed to ensure appropriate response for the identified hazards.

Management Response

Please refer to Management Response under 4.8 Resources above.

4.12 Communication System

No evidence of EMP Appendix F

No evidence of methods or procedures of Crisis Communications Group.

Management Response

Please refer to Management Response (a) under 6.6 Communications and Warning above.

Guidelines for communication systems other than cellular or land phones.

Management Response

Please refer to Management Response (b) under 6.6 Communications and Warning above.

4.13 Public Education and Information

No evidence of methods or procedures of “appropriate public information actions.”

Management Response (a)

AUI uses bill stuffers, bill messages, newspapers, its website, social media channels, face-to-face meetings with digging contractors, and training sessions with municipal agencies and emergency responders to educate and inform the public as well as specific emergency personnel. AUI will create a formal guidance document as part of a formal public education program.

Physical communication resources are referenced as guidelines

Management Response (b)

Please refer to Management Response (c) under 6.6 Communications and Warning above.

No evidence of methods or procedures for public warning.

No evidence of policy, method or procedures for public awareness program.

Management Response (c)

Please refer to Management Response (d) under 6.6 Communications and Warning above.

No evidence of EMP Appendix F

Management Response (d)

Please refer to Management Response (a) under 6.6 Communications and Warning above.

5.2 Emergency Response Records

Note: EMP Appendix “E” Forms not complete.

Management Response (a)

Please see Management Response (b) under 4.4.6 Records Management above.

Document and Records Management Procedure referenced but not provided for review.

Management Response (b)

Please see Management Response (a) under 4.4.6 Records Management above.

EMG 1.8 Procedures or documentation of activation details, resource mobilization, notification/reporting and debriefing records not provided for review.

Management Response (c)

AUI will create a notification/reporting/debriefing form to be included in EMP Appendix E.

5.4.2 Activation of the ERP

EMG 5.4 Regional “call lists” not provided for review

Management Response

Please refer to Appendix 7 - 2014 On Call Schedule and Appendix 2 - Leduc District Emergency Contacts. These examples from the Leduc Operating Region are indicative of AUI schedules and on-call lists for all AUI Operating Regions.

5.4.3 Situational Assessment

EMG 5.4 Regional “call lists” not provided for review

Management Response

See Management Response to 5.4.2 above.

5.4.4 Action Plan

Guidelines on requirements of action plans to be developed at time of emergency

Management Response

AUI recognizes each emergency situation is unique; therefore it has included in its EMP twenty-two examples of potential emergency scenarios, and assessed the risk in each case using a Hazard and Risk Vulnerability Assessment (HRVA). These twenty-two examples provide general guidelines which will, in most cases, be modified to suit individual emergencies and develop a specific action plan for each incident.

5.4.5 Resource Mobilization

Guidelines on communications. No references to personnel, equipment and information required to effectively respond to an emergency.

Management Response

As described in the Management Response to 5.4.4 above, each emergency situation is unique. AUI has a comprehensive list of personnel and equipment, both internal and external, available for dispatch in emergencies, and the Incident Commander is tasked with assigning resources as required. Please refer Appendix 2 – District Emergency Contact List and AUI’s Emergency Management Guide.

5.4.6 Notification and Reporting

Internal Notification – AUI Reporting Chain Card not provided for review.

External Notification – no procedures detailing specific information on reporting

Management Response

AUI’s Emergency Reporting Chain Card (Appendix 3) contains instructions on both internal and external reporting requirements.

5.4.9 Public Communications

No evidence of EMP Appendix F

No evidence of methods or procedures of Crisis Communications Group.

Management Response

See Appendix 5 – Crisis Communications Matrix.

5.4.11 End of Emergency

To be determined by Senior Management

Management Response

AUI's Emergency Management Guide describes the steps taken in declaring an emergency terminated. AUI will include similar language in its EMP.

5.5 Review and Debriefing

Guidelines, no evidence of policies, methods or procedures

Management Response

AUI will create a notification/reporting/debriefing form to be included in EMP Appendix E.

6.2 Equipment Inspection and Maintenance

No evidence of policy, method or procedure

Management Response

AUI has Standard Practices for the inspection and maintenance of its emergency response equipment, including gas detection devices, Self-Contained Breathing Apparatus (SCBA), fire extinguishers, respirators, etc. A sample of inspection and maintenance forms is included in Appendix 8.

6.3 Exercises

Guidelines, no evidence of policy, method or procedure

Management Response

AUI's Standard Practice Manual, Section 10 – Emergency Planning and Response, requires semi-annual Emergency Response training in all operating districts – see Appendix 9. Appendix 10 is a record of AUI's 2013 Emergency Preparedness Exercises, and a schedule for 2014 events. Appendix 11 is an example of an emergency exercise AUI organized in conjunction with other utilities and the City of Leduc Emergency Services.

6.7 Audit

No evidence of policy, method or procedure

Management Response

AUI is in the process of combining all Safety and Environment manuals into one comprehensive EOH&S Management System Manual. Audit requirements are contained as indicated in Appendix 12 – EOH&S Audits.

III. AER Directive 071 Review – Table 3

2.1 Corporate-Level ERP Requirements, 2

Key licensee Contacts: EMP references “Emergency Reporting Chain Card” documentation not provided or verified.

Management Response (a)

Please refer to Appendix 3 - AUI Emergency Reporting Chain Card.

Communications Plan: EMP reference “AltaGas’ Crisis Communication Matrix” documentation not provided or verified

Management Response (b)

See Appendix 5 – Crisis Communications Matrix.

Activation of a Reception Centre: No evidence of policy, method or procedure

Management Response (c)

AUI operates approximately 22,000 km’s of natural gas pipelines in 90 communities across Alberta; approximately 1,500 km’s of which operate above 700 kPa and are relevant to this review. In all of its service territories AUI maintains close relationships with local municipal and emergency response officials, and will support the establishment of local reception centres if and when required. It is anticipated these centres will be schools or community halls, but the nature of the emergency, the availability of local municipal facilities, and the direction of local municipal officials will determine the resources used.

AUI will add verbiage to its EMP detailing the establishment of reception centres.

2.1 Corporate-Level ERP Requirements, 4

24 Hour Emergency Number: No evidence of policy, method or procedure

Management Response

AUI has a 24-hour Emergency Number published in local white and yellow pages, on its web site, on customer bills, and on its Emergency Reporting Chain Card. For reference, the number is 1-866-222-2068. This number will be included in AUI’s EMP.

2.1.1 Assessment Matrix for Classifying Incidents, 5, 6

EMP references “Directive 71 Assessment Matrix” documentation not provided or verified.

EMP and EMP also reference Table 1 “Determining Level of Incident or Emergency”

Table 1 and AER Directive 71 Assessment Matrix are not aligned.

No evidence of policy, method or procedure

Management Response

See Appendix 13 – AER Directive 071; AUI will include this in EMP Appendix G. AUI’s Incident Classification provided in EMP Section 1.2 Levels of Incident Table 1 describes the method AUI uses to classify an incident. This method has been used by AUI and its predecessors for decades, and is, in AUI’s opinion, not inconsistent with the AER method in Directive 71. The AER method uses a risk assessment matrix to determine a level of emergency, levels 1 through 3, with 1 being a low level emergency and 3 being a high level emergency. This is consistent with AUI’s classification.

2.1.2 Communications Planning

EMP reference “AltaGas’ Crisis Communication Matrix” documentation not provided or verified

Management Response

See Appendix 5 – Crisis Communications Matrix.

2.1.5 Reception Centre

No evidence of policy, method or procedure

Management Response

Please refer to Management Response (c) in 2.1 Corporate-Level ERP Requirements, 2 above.

5.1 Assessment Matrix for Classifying Incidents

EMP references “Directive 71 Assessment Matrix” documentation not provided or verified.

EMP and EMP also reference Table 1 “Determining Level of Incident or Emergency”

Table 1 and AER Directive 71 Assessment Matrix are not aligned.

Management Response

See Appendix 13 – AER Directive 071; AUI will include this in EMP Appendix G. AUI’s Incident Classification provided in EMP Section 1.2 Levels of Incident Table 1 describes the method AUI uses to classify an incident. This method has been used by AUI and its predecessors for decades, and is, in AUI’s opinion, not inconsistent with the AER method in Directive 71. The AER method uses a risk assessment matrix to determine a level of emergency, levels 1 through 3, with 1 being a low level emergency and 3 being a high level emergency. This is consistent with AUI’s classification.

5.4 Equipment List

No evidence of policy, method or procedure

Management Response

As described in the Management Response to 5.4.4 above, each emergency situation is unique. AUI has a comprehensive list of personnel and equipment, both internal and external, available for dispatch in emergencies, and the Incident Commander is tasked with assigning resources as required. Please refer Appendix 2 – District Emergency Contact List and AUI’s Emergency Management Guide. Each AUI Emergency Responder is assigned a truck with a complete tool and equipment complement, and each of AUI’s regions has a Construction and Maintenance Crew outfitted with heavy work equipment and various other specialty tools. See Appendix 14 for a list of typical tools and equipment on hand and readily available. In addition, AUI utilizes various external resources which are identified in Appendix 2.

5.5 Mutual Aid Understandings

No evidence of policy, method or procedure

Management Response

Please see Management Response to 6.3 Mutual Aid/Mutual Assistance.

5.6 Telephone Lists

EMP reference “AltaGas’ Crisis Communication Matrix” documentation not provided or verified

Management Response (a)

See Appendix 5 – Crisis Communications Matrix.

EMP references “Emergency Reporting Chain Card” documentation not provided or verified

Management Response (b)

See Appendix 3 - AUI Emergency Reporting Chain Card.

EMG 5.4 Regional “call lists” not provided for review

Guidelines for requirements, specific information including phone numbers not provided.

Management Response (c)

See Management Response to 6.2 Resource Management and 4.8 Resources above.

5.8 Communications Planning

EMP reference “AltaGas’ Crisis Communication Matrix” documentation not provided or verified

Management Response (a)

See Appendix 5 – Crisis Communications Matrix.

EMP references “Emergency Reporting Chain Card” documentation not provided or verified

Management Response (b)

See Appendix 3 - AUI Emergency Reporting Chain Card.

EMG 5.4 Regional “call lists” not provided for review

Management Response (c)

See Management Response 6.2 Resource Management above.

Overlapping ERP Alignment: No evidence of policy, method or procedure

Management Response

AUI does not own or operate any facilities described below, and consequently does not have, or is required to have, overlapping ERP alignment.

If there are separate ERPs for a gathering system that is tied into the sour operations facility, HVP pipeline, or cavern storage facility, then all the licensees must ensure that their ERPs have a bridging paragraph outlining what emergency communication will take place between the parties in the event of an emergency. The sour operations, HVP pipeline, or cavern storage facility ERP bridging paragraph refers to the other ERPs and vice versa.

5.9 Responsibilities of Personnel

Positions identified Names and Contact not provided

Management Response (a)

AUI has a comprehensive Emergency Reporting Chain Card which identifies key personnel and two or three phone numbers for each individual. Further, AUI maintains organizational charts and a comprehensive contact list for all employees. However most important in Emergency Response is the requirement to have competent personnel ready and able to respond to emergency calls. Individuals may change given the competitive labour market in Alberta, but AUI maintains a presence of competent personnel in 16 service locations across the Province, on call 24-7, with supervisor and management support on-call 24-7 also.

EMP reference “AltaGas’ Crisis Communication Matrix” documentation not provided or verified

Management Response (b)

See Appendix 5 – Crisis Communications Matrix.

EMP references “Emergency Reporting Chain Card” documentation not provided or verified

Management Response (c)

See Appendix 3 - AUI Emergency Reporting Chain Card.

EMG 5.4 Regional “call lists” not provided for review

Management Response (d)

See Management Response 6.2 Resource Management above.

5.11 Record Keeping

Note: EMP Appendix “E” Forms not complete.

Management Response

See Management Response (b) to 4.4.6 Records Management above.

EMG 1.8 Document and Records Management Procedure referenced but not provided for review.

Management Response

See Management Response (a) to 4.4.6 Records Management above.

EMG 1.8 Procedures or documentation of activation details, resource mobilization, notification/reporting and debriefing records not provided for review.

Management Response

See Management Response (c) to 5.2 Emergency Response Records.

5.12 Reception Centre

No evidence of policy, method or procedure

Management Response

Please refer to Management Response (c) in 2.1 Corporate-Level ERP Requirements, 2 above.

5.13 Downgrading and Stand-Down of Emergency Levels

No evidence of policy, method or procedure

Management Response

See Management Response to 5.4.11 End of Emergency above.

10 Spill Cooperative Response Plans

Quantum Murray Emergency Response Spill Program not reviewed.

Management Response

Please see Appendix 15 - Quantum Murray Contract.

10.3.2 Spill Response Equipment Requirements

No evidence of policy, method or procedure

Management Response

See Appendix 16 - Environment Management Practices Section 8.5 – Release Response and Reporting.

11.1.1 Assessment Matrix for Classifying Incidents

EMP references “Directive 71 Assessment Matrix” documentation not provided or verified.

EMP and EMP also reference Table 1 “Determining Level of Incident or Emergency”

Table 1 and AER Directive 71 Assessment Matrix are not aligned.

Management Response (a)

See Management Response to 5.1 Assessment Matrix for Classifying Incidents.

AUI’s communication process with regulators not reviewed

Management Response (b)

The requirement to report to the appropriate regulatory authority is described in AUI’s Standard Practice Manual, part 6.2 of Section 10.1 Emergency Planning and Response. See Appendix 17.

11.1.2 Communications Planning

EMP reference “AltaGas’ Crisis Communication Matrix” documentation not provided or verified

Management Response (a)

See Appendix 5 – Crisis Communications Matrix.

EMP references “Emergency Reporting Chain Card” documentation not provided or verified

Management Response (b)

See Appendix 3 - AUI Emergency Reporting Chain Card.

EMG 5.4 Regional “call lists” not provided for review

Management Response (c)

See Management Response 6.2 Resource Management above.

Information available to the public: No evidence of policy, method or procedure

Management Response (d)

AUI will include language in its EMP to ensure information is made available in accordance with AER Directive 71, Appendix 17.

Downgrading and Stand-down of Emergency Levels: AUI’s communication process with regulators not reviewed

Management Response (e)

In section 5.3 of the EMG AUI identifies the need for Regulator Notification. The process is described in greater detail in AUI’s Standard Practice Manual, part 6.2 of Section 10.1 Emergency Planning and Response. See Appendix 17. AUI will revise the EMG to include a more detailed process for communicating the downgrading and stand-down of emergencies.

14.2 Assessment Matrix for Classifying Incidents

EMP references “Directive 71 Assessment Matrix” documentation not provided or verified.

EMP and EMG also reference Table 1 “Determining Level of Incident or Emergency”

Table 1 and AER Directive 71 Assessment Matrix are not aligned.

Management Response (a)

See Management Response to 5.1 Assessment Matrix for Classifying Incidents.

AUI’s communication process with regulators not reviewed

Management Response (b)

See Management Response (e) in 11.1.2 Communications Planning above.

14.4 Equipment Location and Calibration

General guides for sourcing resources

Management Response

See Management Response to 6.2 Equipment Inspection and Maintenance and 5.4 Equipment List above.

14.5 Communications Planning

AUI's communication process with regulators not reviewed

Management Response (a)

See Management Response (e) in 11.1.2 Communications Planning above.

Information available to the public: No evidence of policy, method or procedure

Management Response (b)

See Management Response (d) to 11.1.2 Communications Planning.

Downgrading and Stand-down of Emergency Levels: AUI's communication process with regulators not reviewed

Management Response (c)

See Management Response (e) in 11.1.2 Communications Planning above.

14.6 Plan Management Process

Directive 71 requires semi-annual review

Management Response

See Appendix 18 – Management Review (draft).

14.8 Reception Centre

No evidence of policy, method or procedure

Management Response

Please refer to Management Response (c) in 2.1 Corporate-Level ERP Requirements, 2 above.

14.9 Training Sessions

No evidence of annual tabletop or major exercises every three years.

Management Response (a)

Please see Management Response to 6.3 – Exercises above.

No evidence of notification to AER

Management Response (b)

AUI will revise its Standard Practice Manual, Section 10 – Emergency Planning and Response to include notification requirements.

14.11 Record Keeping

No evidence of policy, method or procedure

Management Response

Please refer to Appendix 1- ADM-057 Records Retention and Disposition Schedule.

16 Member of an Oil Spill Cooperative

Quantum Murray Emergency Response Spill Program not reviewed.

Management Response

See Appendix 15 – Quantum Murray Contract.
