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Mr. Terence Eng, P.E.
Program Manager, Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Ave, 2nd Floor
San Francisco, CA 94102

Dear Mr. Eng:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a **General Order (G.O.) 112-F Comprehensive Operation and Maintenance Inspection of Southern California Gas Company (SoCalGas)'s NW South Coast Distribution Districts** (Inspection Unit) on May 3 through May 7 and May 10 through May 14, 2021, for calendar years 2017 through 2020. SED conducted records review and field inspection of pipeline facilities in the Crenshaw and Santa Monica Distribution Districts.

SED's staff identified two (2) probable violations of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, and noted two (2) areas of concern which are described in the attached "Post-Inspection Written Preliminary Findings". Attached is SoCalGas' written response.

Please contact Troy A. Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,

Troy A. Bauer
Pipeline Safety and Compliance Manager

CC:
Gwen Marelli, SoCalGas
Molla Mohammad Ali, SED
Mahmoud Intably, SED
Kan-Wai Tong, SED
Wilson Lule, SED
Claudia Almengor, SED

2021 South Coast Distribution Area Inspection
5/03/2021 to 5/14/2021

Notice of Probable Violation(s):

1. Pipeline Inspection (Field)

Question Title: Atmospheric Corrosion Monitoring
Question: Is pipe that is exposed to atmospheric corrosion protected?
References: 192.481(b), (192.481 (c), 192.479 (a), 192.479 (b), 192.479 (c))
Assets Covered: Northwest – South Coast (87039 (56))

Issue Summary: During the field inspection of the South Coast facilities, SED observed that exposed pipe at/or near [redacted] Mulholland Dr., Los Angeles had cracked pipe wrap and showed signs of atmospheric corrosion at several spots.

49 CFR §192.479 Atmospheric Corrosion Control, Item (b) states:

"*Coating material must be suitable for the prevention of atmospheric corrosion.*"

SED finds SoCalGas in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.479(b) for failing to adequately protect its pipeline from atmospheric corrosion.

SoCalGas Response & Corrective Actions:
SoCalGas acknowledges that the wrap on this service was cracked and sent a crew out to re-wrap the pipe on 09/16/21 on order 5200002797780. The picture below shows the completed work:

SoCalGas disagrees with SED's statement that the pipe showed signs of atmospheric corrosion. The pipe was found to have surface rust that was addressed by re-wrapping the pipe.

2. Generic Questions (Aboveground pipe supports)

Question: Generic question – Does above ground pipe have enough supports to prevent undue stress on pipe?
References: 192.161(a), 192.161(b) and 192.361(d)
Assets Covered: Northwest - South Coast (87039 (56))

Issue Summary: During field inspection of SoCalGas' South Coast facilities, SED staff observed that an above ground 3/4-inch diameter and 60 feet long service line, at/or near [redacted] Mulholland drive, Los Angeles was unsupported, and bent at one end to align the pipe to the sloping topography.

49 CFR, Part 192 §192.161 Supports and Anchors, Item (b) states:

"*Each exposed pipeline must have enough supports or anchors to protect the exposed pipe joints from the maximum end force caused by internal pressure and any additional forces caused by temperature expansion or contraction or by the weight of the pipe and its contents.*"

SED finds SoCalGas in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.161(b) for failing to provide enough supports or anchors to prevent undue strain on the pipeline and its associated equipment.

SoCalGas Response & Corrective Actions:
SoCalGas acknowledges that the service at [redacted] Mulholland Dr. is unsupported. SoCalGas' Engineering department is providing a design recommendation for pipeline supports and it is anticipated that a design will be completed by mid-October 2021. At the same time, SoCalGas is assessing replacing the exposed portion of the service as a long-term solution. As soon as these designs and assessments are completed, and permits are obtained, SoCalGas will expedite the implementation of the selected solution(s).

Concerns:

1. Records: Operations and Maintenance

Question Title: Valve maintenance Distribution Lines
Question: Do records indicate proper inspection of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable?

References: 192.603(b) (192.747(a), 192.747(b))

Assets Covered: Northwest - South Coast (87039 (56))

Issue Summary: Valve #3750-04 in Santa Monica District and Valve 3702A-15 in Crenshaw District were both found "*Hard to Operate*" in their annual inspections in 2017. SoCalGas did not inspect them quarterly as required by their procedure 184.16. SoCalGas discovered this issue in its internal audit and revised its process so that "*Hard to Operate*" valves will be automatically generated in the

quarterly inspection reports in SAP. SED is aware that this will no longer be an issue but wanted to note the finding for the record.

SoCalGas Response & Corrective Actions:
SoCalGas acknowledges that these valves were not initially placed on a quarterly inspection cycle as required by Gas Standard 184.16. At the time, "*hard to operate*" valves like these were monitored through exception reports, and follow-up inspection orders were manually generated by a clerk.

Since then, SoCalGas has automated the "*hard to operate*" valve follow up order via SAP, which eliminated the need to create the quarterly inspection orders manually. Gas Standard 184.16 has been updated to state:

"SAP will automatically issue a quarterly inspection order until the valve is no longer classified as 'Hard to Operate' and is identified 'Satisfactory'."

2. Pipeline Field Inspection: Pipeline Inspection (Field)

Question Title: Customer Meters and regulator protection
Question: Are meters and service regulators being protected from damage consistent with the requirements of 192.355?

References: 192.351 (192.355(a), 192.355(b), 192.355(c))

Assets Covered: Northwest - South Coast (87039 (56))

Issue Summary: Meters and service regulators located at [redacted] & [redacted] 55th Place, [redacted] 57th St, are exposed to vehicular traffic. Also, a Meter-Set-assembly (MSA) at 3564 Federal Ave, Los Angeles, located in a pit (curb box) was partially buried in the dirt. To ensure that MSAs and service regulators are protected from vehicular traffic damage, SoCalGas should take appropriate actions, repair, and maintain the facilities to demonstrate compliance with Title 49 CFR, Part 192 Sections 192.353(a) & Part 192.355(b)(3).

SoCalGas Response & Corrective Actions:
SoCalGas acknowledges that the meter and service regulator located at [redacted] W. 55th Street, which is SoCalGas's address of record, not [redacted] 55th Place, was exposed to vehicular traffic. A meter guard was installed at [redacted] W. 55th St. on 05/26/21, on order 540000452392. A picture of the meter guard is shown below:

SoCalGas would disagree with SED's assessment that the meter set assembly at [redacted] W. 55th, which is SoCalGas' address of record, not [redacted] 55th Place, is exposed to vehicular traffic. The meter set assembly is an underset on a side of the house with no vehicular or pedestrian traffic in the area. A picture of the meter set assembly location is shown below:

SoCalGas acknowledges that the meter and service regulator located at [redacted] 57th Street was exposed to vehicular traffic. A meter guard was installed at [redacted] 57th St. on 05/13/21, on order 540000452295. A picture of the meter guard is shown below:

In reference to the meter set assembly at [redacted] Federal Ave., the excess dirt was removed by the employee who encountered it during the inspection. In addition, SoCalGas Engineering has determined that a meter made of cast iron or aluminum with a specialized (rubber) coating can be in direct contact with dirt, including up to, or just below, bottom of the index (to the point that the index is not affected by the dirt), or just below the connection components, whichever is lower, in the most extreme case. Use of these meters in curb meter boxes also allows for the meter to sit directly on the soil, thus eliminating the potential for stress to be applied to the service and customer houseline piping.