

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 14, 2020

Mr. Rodger Schwecke, Senior Vice President
Gas Transmission, Storage & Engineering
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

SUBJECT: Notice of Gas Incident Violations for Southern California Gas Company (SCG)

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submits the following Notice Of Probable Violations (NOPV) for non-DOT reportable incident investigations completed as of the Second (2nd) Quarter of 2019. This letter serves as notification to you that as a result of our investigations, SED found SCG in violation of the following:

1. Title 49 CFR §192.195 states in part:

“(a) General requirements. Except as provided in §192.197, each pipeline that is connected to a gas source so that the maximum allowable operating pressure could be exceeded as the result of a pressure control failure or of some other type of failure, must have pressure relieving or pressure limiting devices that meet the requirements of §§192.199 and 192.201.

(b) Additional requirements for distribution systems. Each distribution system that is supplied from a source of gas that is at a higher pressure than the maximum allowable operating pressure for the system must—

- (1) Have pressure regulation devices capable of meeting the pressure, load, and other service conditions that will be experienced in normal operation of the system, and that could be activated in the event of failure of some portion of the system; and*
- (2) Be designed so as to prevent accidental overpressuring.”*

2. Title 49 CFR §192.201(a)(1) states in part:

“(a) Each pressure relief station or pressure limiting station or group of those stations installed to protect a pipeline must have enough capacity, and must be set to operate, to insure the following:

- (1) In a low pressure distribution system, the pressure may not cause the unsafe operation of any connected and properly adjusted gas utilization equipment.”*

3. Title 49 CFR §192.605(a) states in part:

“(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.”

4. Title 49 CFR §192.614(c)(5) states in part:

“(c) The damage prevention program required by paragraph (a) of this section must, at a minimum...

(5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.”

5. General Order 112-F Section 122.2(b)(2) states in part:

“If the operator is notified of the incident outside of its normal working hours, the report should be made as soon as practicable but no longer than 4 hours after the Operator is aware of the incident and its personnel are on the scene.”

6. California Government Code (CGC) 4216.3(a)(1)(A) states in part:

“Unless the excavator and operator mutually agree to a later start date and time, or otherwise agree to the sequence and timeframe in which the operator will locate and field mark, an operator shall do one of the following before the legal excavation start date and time:

(i) Locate and field mark within the area delineated for excavation and, where multiple subsurface installations of the same type are known to exist together, mark the number of subsurface installations.

(ii) To the extent and degree of accuracy that the information is available, provide information to an excavator where the operator’s active or inactive subsurface installations are located.”

7. California Government Code (CGC) 4216.4(a)(1) states in part:

“Except as provided in paragraph (2), if an excavation is within the tolerance zone of a subsurface installation, the excavator shall determine the exact location of the subsurface installations in conflict with the excavation using hand tools before using any power-driven excavation or boring equipment within the tolerance zone of the subsurface installations. In all cases the excavator shall use reasonable care to prevent damaging subsurface installations.”

The summary of the identified violation is listed in Attachment A of this letter. Please provide a written response within 30 days of the date of this letter indicating the measures taken by SCG to address the violation.

For any questions, please contact Kan-Wai Tong at (213) 576-5700 or by email at Kan-Wai.Tong@cpuc.ca.gov.

Sincerely,





Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

CC: Troy Bauer / SoCalGas
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ATTACHMENT: List of Incidents with Probable Violations

Attachment A
List of Incidents with Probable Violations

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Finding	Code Violation(s)
G20170124-2151	01/24/2017	[REDACTED] Newport Beach	SCG	La Strada Pipeline, Inc.	On 01/24/2017, a third-party contractor struck a plastic gas stub, resulting in an unintentional release of gas. The contractor had valid USA tickets (A63620018, A63620019). Based on the information gathered, the GIS showed the location of the stub; however, the SCG locator was unable to get a signal on the stub, misinterpreted it as abandoned, and did not mark the subsurface facility. Therefore, SED found SCG in violation of 49 CFR §192.614(c)(5) and California Government Code Section 4216.3 (a)(1)(A) for failing to provide temporary markings of its subsurface facilities.	49 CFR §192.614(c)(5), CGC 4216.3(a)(1)(A)

G20170926-2364	09/26/2017	 West Hollywood	SCG	N/A	<p>On 09/26/2017, a SCG technician was inspecting the first-stage regulator (FSR) of a regulator station and noticed that the FSR was installed missing required sensing lines, resulting in an over-pressurization of its downstream piping. Further investigation revealed that the FSR was installed by a contractor, and that the sensing lines requiring leak test would be SCG's responsibility. Due to miscommunication between the SCG groups in charge of installation and in charge of operating regulator stations, the FSR was given permission to start operating in November 2016, without installation of sensing lines being completed. Based on SED's investigation, this incident was caused by lack of coordination between SoCalGas and its contractor. This led to the FSR operating without proper overpressure protection for about 10 months, leading to the downstream piping experiencing MAOP exceedance during this period. Therefore, SED found SCG in violation of 49 CFR §192.195 & 192.201(a)(2).</p>	49 CFR §192.195, 49 CFR §192.201(a)(2)
G20180103-2471	01/03/2018	 Laguna Niguel	SCG	Paulus Engineering	<p>On 01/03/2018, SCG received area odor complaints in Laguna Niguel. The source of odor was a natural gas leak from its punctured 2-inch plastic gas main struck by a third party contractor. SED found that the incident was caused by SCG failing to provide accurate temporary markings of its gas main as described in a valid USA ticket. Therefore, SCG is in violation of 49 CFR §192.614(c)(5) and California Government Code Section 4216.3 (a)(1)(A).</p>	49 CFR §192.614(c)(5), CGC 4216.3(a)(1)(A)

G20180408-2522	04/09/2018	[REDACTED], Fullerton	SCG	City of Fullerton Water District	On 04/09/2018, the City of Fullerton Water District struck and damaged a SCG 2-inch plastic gas main while excavating for a water valve replacement, resulting in a gas release into the atmosphere. SED found that the incident was caused by SCG failing to provide accurate temporary markings of its gas main in response to the USA ticket. Therefore, SCG is in violation of 49 CFR §192.614(c)(5) and California Government Code Section 4216.3(a)(1)(A).	49 CFR §192.614(c)(5), CGC 4216.3(a)(1)(A)
G20180730-2625	07/30/2018	[REDACTED], Huntington Beach	SCG	N/A	On 07/29/2018, SCG received 27 odor complaint calls. SCG crew investigated the area odor per their standard procedures GS 142.02 & 142.1961. SCG's investigation found no leaks suspected on their gas facilities, and instead suspects that the source of the odor was from the offshore drilling rigs. SCG filed its incident report to SED the following day at 1138 hours, which was 19 hours post-incident. Due to the incident occurring outside of normal business hours, SED finds that SCG violated GO 112-F Section 122.2(b)(2).	GO 112-F Section 122.2(b)(2)

G20190109-2746	1/18/2019	[REDACTED] Fontana	SCG	N/A	On 1/8/2019, SCG received odor complaint calls around [REDACTED], Fontana. SCG crew investigated the area odor per their standard procedures GS 142.02 & 142.1961. SCG's investigation found no leaks suspected on their gas facilities, and instead suspects that the source of the odor was from the offshore drilling rigs. SCG filed its incident report to SED the following day at 1729 hours, which was 22 hours post-discovery. Due to the incident occurring outside of normal business hours, SED finds that SCG violated GO 112-F Section 122.2(b)(2).	GO 112-F Section 122.2(b)(2)
G20190314-2772	3/14/2019	Dusty Drive and 69 th Street, Santa Clarita	SCG	Doty Brothers	On 3/14/2019, a contractor working for SCG struck and damaged a ¾-inch steel high pressure supply line with a backhoe causing a release of gas. Based on the information gathered, the SCG contractor failed to follow SCG's procedure to dig and pot hole using hand tools to locate marked subsurface facilities prior to using power-driven equipment. SED found SCG in violation of 49 CFR §192.605(a) and California Government Code Section 4216.4(a)(1).	49 CFR §192.605(a), CGC 4216.4(a)(1)