

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 18, 2021

Non-DOT 2021-Q3

Rodger Schwecke,  
Senior Vice President and Chief Infrastructure Officer  
Southern California Gas Company  
555 West 5<sup>th</sup> Street, GT21C3  
Los Angeles, CA 90013

Dear Mr. Schwecke,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) reviewed San Diego Gas and Electric Company (SDG&E)'s response letter dated November 3, 2021, addressing three (3) probable violations identified by SED during its investigation of Non-DOT reportable incidents that occurred during March 5 through March 29, 2021.

Attached is a summary of SED's investigation findings, SDG&E's response to SED's findings, and SED's evaluation of SDG&E's response to the probable violations.

This letter serves as official closure and any matters that are being considered for enforcement will be processed through the Commission's Citation Program or formal proceeding.

Thank you for your cooperation in this investigation. If you have any questions, please contact Mohammad Ali, Senior Utilities Engineer (Supervisor), at (916) 928-2109 or by email at [ma5@cpuc.ca.gov](mailto:ma5@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Mahmoud Intably".

Mahmoud (Steve) Intably, P.E.  
Program and Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

cc: See next page

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## Non-DOT Reportable Incidents -From March 5 through 29, 2021

### Identified Probable Violations

#### **1. General Order (G.O.) 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, §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. For transmission lines, the manual must also include procedures for handling abnormal operations.....”*

- a. SDG&E’s Gas Standard G7451 “Company and Company-Contractor Damage Prevention Excavation Requirements” Section 4.3.3.1 states:

*“Pothole all marked subsurface installation locations with hand tools within the tolerance zone. The tolerance zone hand excavating requirement is measured from the edge of the subsurface installation, as indicated by the owners and/or operators’ markings.”*

#### **2. G.O. 112-F, Reference Title 49 CFR, Part 192, §192.614(c)(5) states:**

*“(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.”*

On March 5, 2021, at approximately 0811 hours, SDG&E’s contractor, SE Pipeline Construction (SE Pipeline) was excavating using a backhoe when it damaged an SDG&E’s 1-inch steel drip line, causing an unintentional release of natural gas into the atmosphere and a service interruption to 19 customers for approximately 17 hours. There were no fatalities, injuries, or fire reported as the result of this incident.

SED found that:

- SDG&E’s employee failed to use hand tools within the tolerance zone to determine the exact location of the 1-inch steel drip line as required by its Gas Standard G7451, §1.1. Therefore, SDG&E is in violation of §192.605(a) for not following its Gas Standard G7451, §1.1
- SDG&E’s employee failed to provide accurate temporary field marking for the 1-inch steel drip line and temporary field marking for the 12-inch steel drip pan. Therefore, SDG&E is in violation of §192.614(c)(5) for failure to provide temporary marking of its buried pipelines in the area of excavation.

#### **SDG&E’s Response & Corrective Actions:**

SDG&E values the safety of the public and strives to learn from any incident. SDG&E acknowledges SED’s evaluation of the incident on 3/5/2021 at [REDACTED] 32nd St. in San Diego

SDG&E investigated the incident to determine why it occurred, who was responsible, and what actions to take next. On 3/19/2021, SDG&E and SE Pipeline Construction representatives had a meeting to discuss the incident, mitigation measures, and expectations moving forward. SE Pipeline agreed with the SDGE Investigation Team's findings and recommendations. SE Pipeline provided detailed corrective measures with a schedule for completion of training for employees companywide.

- When potholing by hand and utilities are not found, SE Pipeline will ensure remarks are called in for clarification.
- At no time will mechanized equipment be used to excavate without first verifying all substructures in the area.
- SE Pipeline had an all-hands employee safety stand down on March 9, 2021, to go over the SDG&E Gas Standard G7451, Golden Shovel, and California Code 4216.
- On March 16, 2021, all SE Pipeline employees (gas division) received a refresher on the Gold Shovel program

SDG&E understands the importance of accurate field marking for potholing prior to excavation to verify utility accuracy. SDG&E acknowledges that the temporary markings of some components of the oil drip were not accurate. The locator could not accurately locate all drip line components because, historically, some oil drip locations and configurations were not consistently captured on legacy facility maps. As a result, SDGE is removing select oil drips as part of the 2019 GRC approved RAMP (Risk Assessment Mitigation Program).

#### **Corrective Actions:**

- Internal communications were sent to all impacted groups. The communications clarified the generic purpose and historic design variations of oil drip lines and provided an explanation of the risks associated with the removal of these facilities.
- Locate & mark supervision communicated the general schematic and concept of an oil drip line with all company locators during their safety meeting.

#### **SED's Conclusion:**

SED has reviewed SDG&E's response and accepts the proposed corrective actions. SED acknowledges that the proposed corrective actions will promote and foster strong safety culture, and sufficiently address the probable violations. SED recommends no fines or penalty be imposed at this time.

#### **3. G.O. 112-F, Reference Title 49 CFR, Part 192, §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. For transmission lines, the manual must also include procedures for handling abnormal operations.....”*

- a. SDG&E's Gas Standard G7451 “Company and Company-Contractor Damage Prevention Excavation Requirements” Section 4.3.3.1 states:

*“Pothole all marked subsurface installation locations with hand tools within the tolerance zone. The tolerance zone hand excavating requirement is measured from the edge of the subsurface installation, as indicated by the owners and/or operators’ markings.”*

On March 29, 2021, at approximately 1344 hours, SDG&E crews struck their own 3/4-inch steel service with a backhoe at [REDACTED] Merritt Blvd, La Mesa, when they were excavating to install new gas service line. SED’s investigation found that this dig-in incident was caused by SDG&E failing to follow the SDG&E’s Gas Standard, G7451, § 4.3.3.1, and expose the properly marked SDG&E gas service line with hand tools prior to using power-driven excavation equipment within the tolerance zone. Therefore, SED finds SDG&E in violations §192.605 (a) for not following its Gas Standard G7451§ 4.3.3.1.

### **SDG&E Response & Corrective Actions:**

SDG&E values the safety of the public and our employees and strives to learn from any incident. SDG&E disagrees with SED’s assessment that SDG&E failed to follow gas standard G7451 while excavating. On 3/29/2021, an SDG&E crew was potholing the existing 3/4 inch service at [REDACTED] Merritt Blvd. in La Mesa. While removing the existing pavement with a backhoe, the crew damaged a shallow service that was 2 inches below the asphalt. The crew was required to pothole the existing 3/4 inch service to locate underground facilities per GS G7451 section 4.3.3.3.1, which states: *Pothole all marked subsurface installation locations with hand tools within the tolerance zone. The tolerance zone hand excavating requirement is measured from the edge of the subsurface installation, as indicated by the owners and/or operators’ markings.* Also, section 1.1. of the gas standard G7451 states: *Company and Company Contractor personnel performing excavation and/or construction activities must follow all State of California Regulations (I.e., California Government Code, Title 1, Division 5, Chapter 3.1, Section 4216) to prevent damage to subsurface installations. California Code 4216.4(2)(B) states: An excavator may use power-operated or boring equipment for the removal of any existing pavement only if there is no known surface installation contained in the pavement.*

### **Corrective Actions:**

- The incident was shared and discussed with all applicable company employees in order to share lessons learned
- SDG&E management will continue emphasizing the importance of exercising caution while performing construction activities like removing asphalt and concrete when excavating near underground facilities.
- Management will continue to annually review GS G7451 Prevention of Damage to Subsurface Installations with affected employees to reinforce precautions are taken during construction activities to prevent damage to underground facilities.

### **SED’s Conclusion:**

SED has reviewed SDG&E’s response and accepts the proposed corrective actions. SED acknowledges that the proposed corrective actions will promote and foster strong safety culture, and sufficiently address the probable violations. SED recommends no fines or penalty be imposed at this time. However, SED may review the implementation of the stated corrective actions during future procedures review.