

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 25, 2022

Non-DOT completed in Q1-2021

Rodger Schwecke,
Senior Vice President and Chief Infrastructure Officer
Southern California Gas Company
555 West 5th 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 June 14, 2021, addressing one (1) probable violation identified by SED during its investigation of Non-DOT reportable incidents that occurred in November 10, 2020.

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 violation.

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.

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 Incident in November 2020

Identified Probable Violation

1. General Order (G.O.) 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, §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.”

On November 10, 2020, at approximately 1000 hours, a third-party contractor, Lekos Electric, struck an SDG&E’ 1½ -inch steel gas main with a wheel trencher while trenching for traffic light signals. This resulted in release of gas into the atmosphere, service interruption, and damage to the gas main. There were no injuries, fatalities, or third-party damage reported as the result of this incident. This incident was reported to the CPUC due to release of gas and major media coverage. SED’s investigation found that the incident was caused by SDG&E’s failure to locate, and field mark its 1½ -inch steel gas main within the area of excavation activity before the start of excavations (as described in a valid USA ticket). Therefore, SED finds SDG&E in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.614(c)(5) for failure to provide for temporary marking of its buried pipeline within the area delineated for excavation.

SDG&E’s Response:

SDG&E puts public and employee safety as its top priority and is dedicated to learning from any incident that may occur as a result of its work activities. SDG&E acknowledges that the incident on 11/10/2020 at [REDACTED] Redwood Street in San Diego was the result of our company locator not following the Gas Standard G8123 – *Underground Service Alert and Temporary Markings* for temporary markings of Company subsurface installations on the ticket request A201541254.s

Corrective Actions:

- SDG&E conducted a full investigation of this incident to determine the cause of the incident, who was responsible, what actions to take next, and what lessons could be learned from it.
- Due to an oversight, the employee failed to locate and mark the entire delineated area as prescribed in G8123.
- SDG&E temporarily suspended the locate and mark operator qualification of the employee who was responsible for completing the ticket. Previous tickets that were completed by this employee were reviewed for completeness and accuracy. No other errors or discrepancies were identified.
- On 11/17/2020, after the investigation was completed, the employee was given a warning for Failure to Follow Policy/Procedures in not verifying the delineated work area prior to marking out the Dig Alert Ticket.
- The employee has received refresher training on the Gas Standard G8123 – *Underground Service Alert and Temporary Markings* and a locator’s responsibilities which includes, but is not limited to, detailed reviews of each ticket to ensure all markings are being performed for the entirety of the requested delineated area of excavation. SDG&E reinstated the employee’s locate and mark operator qualification on 11/17/2020.

- This event was shared with all company locators at SDG&E, as well as the Quality Assurance team. While sharing this incident with employees, supervision stressed the importance of utilizing all available resources when conducting locate and mark tickets. This includes a thorough review of the assigned ticket request to validate the area of excavation, a walk-through of the entire job site to confirm the encompassed area that has been delineated, and if necessary, the ability to contact the ticket requestor should they have any questions about the extent of the requested area of excavation.

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 violation. 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.