



Alex Hughes
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Mr. Mahmoud (Steve) Intably, P.E.,
Program and Project Supervisor, Gas Safety and Reliability Branch,
Safety and Enforcement Division,
California Public Utilities Commission,
320 W. Fourth Street, Suite 500
Los Angeles, CA 90013

Dear Mr. Intably:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) submitted the following Notice of Probable Violations (NOPV) for Non-DOT reportable incident investigations completed in Q2 of 2022.

Below is the Southern California Gas Company's (SoCalGas's) written response.

Please contact Alex Hughes at (949)697-2539 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", written over a light blue grid background.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

CC:

Gwen Marelli, SoCalGas
Terence Eng, SED
Mohammad Ali, SED
Kan-Wai Tong, SED
Wilson Lule, SED
Jordan Lin, SED
Claudia Almengor, SED

2022 SoCalGas 2nd Quarter Non-DOT Incident Investigation Response

Violation:

G.O. 112-F, Reference Title 49 CFR, Part 192, § 192.614(c)(5)

On March 25, 2022, at about 1515 hours, a third-party contractor, Media Communications Company struck SoCalGas' 2-inch plastic gas main and a ½-inch plastic service line with a wheel trencher while installing underground communication lines. This resulted in release of natural gas into the atmosphere, service interruption, and damage to the gas lines. 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 natural gas and major media coverage. SED's investigation found that the incident was caused by SoCalGas failing to locate and field mark its subsurface installations (2-inch plastic gas main and ½-inch plastic gas service line) within the area of excavation activity before the start of excavation. Therefore, SED found SoCalGas in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, § 192.614(c)(5).

Response:

SoCalGas 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. SoCalGas acknowledges that the incident on March 25, 2022, at 2020 E. Joyce Drive in Palm Springs, CA was the result of Company records being insufficiently accurate. We continually strive to improve our process. Listed below are our findings and corrective actions for this incident.

Corrective Actions:

SoCalGas investigated the incident to determine the cause, who was responsible, what actions to take next, and what lessons could be learned.

The locate and mark employee had difficulty getting a proper signal at the tie-in location and used measurements to locate the tie-in and service.

The excavator, who was using a boring machine that was parked at 2040 E. Joyce Way, hit the small main cross over at the tie-in location along with the proximate service that was located at 2020 E. Joyce Way. Post incident field validation revealed that the Company records denoting the service and tie-over location were inaccurate.

Updates to service history and mapping records were initiated and are currently underway through a mapping update request (MUR 197804).

The locate and mark team has discussed this incident and performed a refresher with all locators on utilizing all available resources when difficult-to-locate subsurface installations

Violation:

G.O. 112-F, Reference Title 49 CFR, Part 192, §192.614(c)(5)

On February 8, 2022, at approximately 1655 hours, a third-party contractor, Nobest Inc. struck a SoCalGas 2-inch steel gas main with a backhoe. This incident resulted in a release of natural gas, damage to the gas main, and a service interruption. SED's investigation found that the incident was caused by SoCalGas failing to locate and field mark its subsurface installation (2-inch steel gas main) within the area of excavation activity before the start of excavation. Therefore, SED found SoCalGas in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.614(c)(5).

Response:

SoCalGas 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. SoCalGas acknowledges that the incident on February 8, 2022, at 2213 Florida Street, Huntington Beach, CA was the result of SoCalGas' locate and mark personnel not following Gas **Standard GS 184.0200 – *Underground Service Alert and Temporary Markings*** for temporary markings of Company subsurface installations.

Corrective Actions:

SoCalGas investigated the incident to determine the cause, who was responsible, what additional actions may be needed and any lessons that could be learned.

Through the investigation, it was revealed that the locate and mark employee did not follow Company procedure and failed to mark Company facilities. This occurred based upon the field locator's understanding of the proposed depth of excavation based upon conversations with the excavator.

The locator should have followed Company procedure and marked the Company facilities instead of determining there was no conflict.

The local management team provided training on **GS 184.0200 – *Underground Service Alert and Temporary Markings to the employee*** and other locate and mark personnel at the base.

To address the potential for a similar situation occurring across the Company, **Info Bulletin 2222, *No Depth Exemptions when Completing USA Tickets*** was published on 3/15/22. The bulletin clarifies that locator and mark personnel must not complete tickets as no conflict based upon depth of excavation. Training based upon the Info Bulletin was completed for qualified field employees on **IBSC0520** on 4/1/22.