

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 10, 2022,

Non-DOT completed in Q3-2022

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 November 9, 2022, addressing two (2) probable violations identified by SED during its investigation of Non-DOT reportable incidents that occurred on September 9, 2021, in the city of Chula Vista and April 6, 2022, in the city of El Cajon, in San Diego County.

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 these investigations. 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 that reads "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 on September 9, 2021 and April 6, 2022

Identified Probable Violations

1. **G.O. 112-F, Reference Title 49 Code of Federal Regulations, Part 192, §192.605(b)(3) states in part:**

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(3) Making construction records, maps, and operating history available to appropriate operating personnel.”

On September 9, 2021, at approximately 1555 hours, an SDG&E aboveground distribution regulator station malfunctioned resulting in a service interruption. SED’s investigation found that the incident was caused by unauthorized persons tampering with a regulator station valve. During the investigation, SED found a discrepancy in SDG&E’s regulator station design records, where in an upstream branch valve was not shown in RS 1344 regulator station diagram. Therefore, SED finds SDG&E to be in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(b)(3).

SDG&E’s Response:

SDG&E acknowledges that the reg station 1344 diagram did not include a ¼" appurtenance valve.

Corrective Actions:

SDG&E has updated the diagram to include the ¼” appurtenance valve. Pipeline Operations Supervision reviewed Gas Standard G8159 - Distribution Pressure Regulating and Monitoring Station & Vault - Inspection, Maintenance, and Settings, with all Pipeline Operations Regulator Technicians and stressed the importance of verifying the station schematic is correct and reporting discrepancies.

SED’s Conclusion:

SED has reviewed SDG&E’s response and accepts the corrective actions taken. SED acknowledges that the proposed corrective actions sufficiently address the probable violation. SED recommends no fines or penalty be imposed at this time.

2. **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 April 6, 2022, at around 1317 hours, a third-party contractor, HHS Construction, struck an SDG&E 1/2-inch plastic service line with a horizontal boring machine, resulting in damage to the service line, release of natural gas into the atmosphere and a service interruption. SED's investigation found that the incident was caused by SDG&E failing to make the construction maps/records available to its locator and provide the temporary markings for the service line as required by a valid USA ticket prior to the excavation. Therefore, SED finds SDG&E in violations of G.O. 112-F, Reference Title 49 CFR, Part 192, Sections 192.605(b)(3) and 192.614 (c)(5).

SDG&E's Response:

SDG&E acknowledges that the company locator did not provide an accurate field mark of the 1/2" service line within the area of excavation.

Corrective Actions:

The damaged segment of service was repaired on Work Order 530000274953 and the GIS map was updated to reflect the most current information.

SDG&E has a new Map Update Request process for reporting and correcting as-found GIS discrepancies. All impacted organizations have been trained in the new process. Organization have been trained in the new process.

SED's Conclusion:

SED has reviewed SDG&E's response and accepts the proposed investigations and corrective actions taken. 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.