



Alex Hughes
Pipeline Safety and Risk Mitigation Manager
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May 5, 2022

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 investigation completed in Q1 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 rectangular background.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

CC:

Gwen Marelli, SoCalGas
Terence Eng, SED
Molla Mohammad Ali, SED
Kan-Wai Tong, SED
Gordon Kuo, SED
Claudia Almengor, SED

NOPV Non-DOT reportable incidents SoCalGas Q1-2022

Notice of Probable Violation:

G.O. 112-F, Reference Title 49 CFR, Part 192, §§192.605(a) and 192.614(c)(5)

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Finding	Code Violation(s)
G 20210714-3240	7/14/2021	Intersection of Washington Street & Shrimp Lane, in Winchester, Riverside County	SoCalGas	Pauley Construction	See Below	G.O. 112-F, Reference Title 49 CFR, Part 192, §§192.605(a) and 192.614(c)(5).
<p>On July 14, 2021, at approximately 0805 hours, a third-party contractor, Pauley Construction, struck a SoCalGas 2-inch plastic gas main line with a mini excavator, resulting in damage to the gas main and a release of natural gas into the atmosphere. SED's investigation found that the incident was caused by SoCalGas failing to provide temporary marking for the gas main line as required by a valid USA ticket prior to excavation. Therefore, SED found SoCalGas in violations of G.O. 112-F, Reference Title 49 CFR, Part 192, §§ 192.605(a) and 192.614(c)(5).</p>						

SoCalGas 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 7/14/2021 at the intersection on Shrimp Lane, west of Washington Street in the City of Winchester, CA was the result of the SoCalGas company locator not following **Gas Standard GS 184.0200 – *Underground Service Alert and Temporary Markings*** for temporary markings of Company subsurface installations on the ticket A211610956.

Corrective Actions:

- SoCalGas 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.
- Through the investigation, it was revealed that the locate and mark employee needed additional training to be aware that he or she could obtain available construction drawings that were attached to a Work-In-Progress/Notification Polygon in GIS, which depicts recent construction activities.
- As part of project execution, the Company initiates a Work-in-Progress/Notification Polygon during the planning phase. Once planning is complete, construction drawings are attached to the polygon in GIS and made available for viewing as an attached pdf. The documents remain attached to the polygon while the project is in construction and throughout the closeout phase of the project until final posting. This practice allows for field personnel to have access to construction drawings of new projects that are

spatially referenced in GIS while the capital project is being completed in the field and/or is being fully incorporated into the Company's records during the close out process.

- The employee received refresher training on the GS 184.0200 – *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.
- To address the potential for other existing field personnel who may need supplemental training, Info Bulletin 2154, *Viewing WIP Cloud and Notification Polygon Maps While Performing Locate and Mark* was issued on 11/15/21, providing step-by-step guidance on how to obtain construction drawings when there is a Work-In-Progress/Notification Polygon in GIS. Training was completed for qualified field employees on 12/01/21.
- Formalized Training reviewed the locate and mark curriculum to enhance training for new locate personnel on the procedure to obtain construction drawing attached to the WIP/notification polygon in GIS.