



Alex Hughes
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March 24, 2023

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:
Neena Master, SoCalGas
Terence Eng, SED
Mohammad Ali, SED
Michelle Wei, SED
Claudia Almengor, SED

2022 SoCalGas 2nd Quarter Non-DOT Incident Investigation Response 2

Violation:

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

On September 23, 2021, at approximately 0955 hours, a third-party contractor JFL Electric Inc. struck SoCalGas' 4-inch steel gas main while boring. This resulted in damage to the SoCalGas' 4-inch steel gas main release of gas, and service interruption to 11 customers for 22 hours. 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 service interruption. SED's investigation found that this incident was caused by SoCalGas failing to locate and field mark its subsurface installations (4-inch steel gas main) within the area of excavation. Therefore, SED find SoCalGas in violation of GO 112-F, Reference Title 49 CFR, Part 192, Section 192.614(c)(5).

Response:

SoCalGas puts public, contractor, 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 continually strives to improve processes and has investigated this incident.

Based upon our understanding of what occurred, SoCalGas disagrees that it was in violation of GO-112F, Federal Code Title 49 CFR, Part 192.614(c)(5) or its applicable gas standards. 49 CFR 192.614(b) states: "An operator may comply with any of the requirements of paragraph (c) of this section through participation in a public service program, such as a one-call system..." California's One-Call rules are set forth at Government Code section 4216.2.

SoCalGas' investigation reveals that the contractor failed to provide delineation of the area to be excavated, as required by California Government Code 4216.2 (a). This is a requirement so utility operators know where a proposed excavation activity will occur. Since the contractor failed to provide delineation, the SoCalGas locator who responded appropriately requested that the contractor delineate the proposed excavation site and resubmit a USA ticket before performing excavation activities, as allowed by California Governmental Code 4216.2 (a). Code 4216.2 (a), states, "If the area is not delineated, an operator may, at the operator's discretion, choose not to locate and field mark until the area to be excavated has been delineated".

Unfortunately, the contractor did not delineate the site or re-submit for a USA ticket per Gov Code 4215.2(a). Instead, it attempted to bore without proper field markings, which led to the damage. Based on the above, SoCalGas believes that its actions related to this incident met all applicable codes and respectfully requests that SED reconsider its finding of a violation related to this incident.