

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

March 7, 2024,

ConstD-20231215-58-1

Mr. Rodger Schwecke, Senior Vice President  
Gas Transmission, Storage & Engineering  
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 Southern California Gas Company (SoCalGas)'s response letter dated February 16, 2024, addressing two probable violations identified by SED during its inspection of a gas service replacement including the tapping to a SoCalGas' 6-inch steel gas main in the vicinity of 482 Vineyard Pl, Pasadena, Los Angeles County on December 15, 2023.

Attached is a summary of SED's investigation findings, and SoCalGas's responses to SED's findings, and SED's evaluation of SoCalGas's responses to the probable violations.

This letter serves as an official closure letter and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this investigation. If you have any questions, contact Kan-Wai Tong, Senior Utilities Engineer Supervisor, at 213-576-5700 or by email: [kwt@cpuc.ca.gov](mailto:kwt@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

Attachment: West View 1, East View, West View 2  
cc: See next page

Alex Hughes, Pipeline Safety and Risk Mitigation Manager  
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**2023 SoCalGas Distribution Inspection**  
**12/15/2023 at 482 Vineyard Pl, Pasadena, Los Angeles County**

**Identified Probable Violations:**

1. G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, Section 192.605(a) General states in part:

*“Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.”*

SoCalGas’ Gas Standard 184.0200, Underground Service Alert and Temporary Marking, Section 4.6, “Temporary Marking of Company Subsurface Installations” states in part:

*“4.6.10. Ensure and verify the location of all Company subsurface installations within the delineated area using:*

- *Use an approved locating instrument*
- *Use the most up-to-date copies of Company records, such as GIS maps, as-builts and drawings as additional resource information, and*
- *Use service history data to assist in the determination and placement of accurate surface markings for mapped and unmapped services, service stubs, or service cutbacks”*

2. G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, Section 192.614(c)(5) states in part:

*“Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.”*

During SED’s field inspection with SoCalGas’ contractor (NPL Construction Company), SED found that the contractor had already exposed the pre-existing service (½-inch plastic insert into ¾-inch steel) and installed a section of the new service (½-inch PE) via pneumatic bore. However, the contractor did not locate and mark the pre-existing 6-inch steel gas main prior to excavation within their delineated area because the locating equipment did not generate strong enough signal to confirm the location of the main. In addition, the contractor did not use other records, such as GIS maps, as-builts and drawings as additional resource information to mark the main prior to excavation either.

Consequently, SED found one (1) instance in which SoCalGas’ contractor failed to follow and comply with the requirements stated in SoCalGas’ Gas Standard 184.0200 and thus 192.605(a), and one (1) instance in which SoCalGas’ contractor failed to comply with 192.614(c)(5) for not providing temporary marking for its underground facilities prior to excavation. Therefore, SED found that SoCalGas committed a total of two (2) violations of General Order 112-F which incorporates Title 49 CFR Part 192 by reference.

**SoCalGas Response:**

SoCalGas acknowledges on 12/15/2023, SED visited and inspected a multi-phased service replacement at 482 Vineyard Place, Pasadena CA. During SED’s visit the contractor was working the initial phase.

During the inspection, SED issued a violation because SoCalGas' contractor failed to locate and mark the gas main. Per Gas Standard 184.0200, CFR 192.605(a), and CFR 192.614(c)(5), the contractor was not required to locate and mark the gas main because it was not in proximity of the "excavation activity" per CFR 192.614(c)(5) which states: "provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins". The contractor located and provided reference marks of the service line that was in the "excavation activity" per Gas Standard 184.0200.

Because the gas main was outside of the contractor's excavation activity, Gas Standard 184.0200 and CFR sections 192.605(a) and 192.614(c)(5) do not apply.

**SED's conclusion:**

SED has reviewed SoCalGas's responses and respectfully disagrees with SoCalGas' conclusion.

SED acknowledges that while SoCalGas' gas main was not in the immediate proximity of the excavation activity occurring on the customer property lot for the service line on the day of the inspection, it was nonetheless within the delineated area.

**Additional clarification to SED conclusion:**

- SoCalGas' Gas Standard 184.0200 Section 4.6.10, Section 4.6.2 of the same Gas Standard further clarifies that:

*"When Company subsurface installations may be involved in the work area, a locator must respond to the request as soon as practical, but no later than the legal excavation start date and time see definition Section 3.14."*

- Gas Standard 184.0200, Section 3.14 states, in part:

*"Legal excavation start date and time – means two working days, not including the date of notification, unless the excavator specifies a later date and time, which must not be more than 14 calendar days from the date of notification..."*

- Gas Standard 184.0200, Section 3.16 states, in part:

*"Mutual Agreement – ... Mutual agreement must be reached prior to the initial legal excavation start date and time and documented in KorTerra for each USA ticket."*

Therefore, per SoCalGas' Gas Standard 184.0200, SoCalGas must have ensured and verified the location of all subsurface installations within the delineated area, including its pre-existing service and 6-inch gas main, by providing temporary USA markings as soon as practical, but no later than two working days, from the date of the USA ticket, numbered B233340650G4QM, requested on November 30, 2023, by the SoCalGas' contractor (NPL). The same USA ticket indicates "12/04/23 17:01" as the legal start date and time while "facility info provided. NPL" is noted in the completion section. At the time of the incident, the maximum 14-day extension had already elapsed, and no SoCalGas documentation shows any mutual agreement was discussed and documented in its KorTerra.

Furthermore, SED's photographs of the site show that the SoCalGas' 6-inch gas main was within the contractor's delineated area on the public road. Please see the attached photos below. Per SoCalGas' Gas Standard 184.0200, the gas main must be located and marked within the delineated area. Thus, Gas Standard 184.0200 and CFR sections 192.605(a) and 192.614(c)(5) would apply.

SED recommends no fine, or penalty be imposed at this time. However, SED requests SoCalGas to develop corrective actions to prevent reoccurrence of similar violations and provide proof of the corrective actions.

## Attachments



**Photo 1. West View 1 (pre-existing white delineation and added SoCalGas' yellow marking)**



**Photo 2. East View (pre-existing white delineation and customer property)**



**Photo 3. West View 2 (other pre-existing underground utilities' markings)**