

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 27, 2019

G20190715-2857-MAI

Mr. Rodger Schwecke, Senior Vice President
Gas Transmission, Storage & Engineering
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

SUBJECT: Notice of Gas Incident Violations for Southern California Gas Company (SCG)

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submits the following Notice of Probable Violations (NOPV) for DOT #1252045 reportable incident investigation that occurred on July 15, 2019. SED found that SCG's employees failed to follow and comply with the requirement in SCG's Gas Standards. This letter serves as notification to you that as a result of SED's investigation, SCG was in violation of the followings rules and regulations:

1. General Order 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. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted."

1.1 SCG's Gas Standard 183.03, Field Guidelines-Emergency Incident Distribution/Customer Service requires the following:

- Section 4.1 addressing public safety, employee safety, protection of property
- Section 4.2 requires SCG's employee to conduct on site evaluation of potential hazards to life and property resulting from escaping gas.
- Section 4.2.2 requires SCG's employee to establish communications with fire and/or police departments on the scene as soon as possible.
- Section 4.2.5 requires SCG's employee to determine if the concentration of escaping gas is sufficient to make ignition a possibility, especially in or under structures, whether from underground migration or air movement, check and monitor perimeter of the area hazard
- Section 4.2.6 requires SCG's employee to evacuate and restrict people from any hazardous area, particularly buildings, if the concentration of gas indicates ignition is a possibility.
- Section 4.2.13 requires SCG's employee to maintain surveillance of uncontrolled

escaping gas using approved combustible gas indicator to minimize the potential hazard to the general public until assistance arrives.

- Section 4.3.1 requires SCG's response crew up on arrival at the scene to immediately assess the potential hazards of escaping gas. The response crew leader shall review the status of the incident with the responsible company employee on the scene or perform the action and evaluation.
- Section 4.3.2.3 requires SCG's employee to wear appropriate respiratory protective equipment and Gas Extraction Suit if gas was blowing freely when the crew planning to control the gas at the point of discharge.

1.2 SCG's Gas Standard 184.0245 Leak Investigation, requires SCG's employee conducting leak investigation to do the following:

- Section 1.3 requires SCG's employee to immediately conduct an on-site evaluation of hazards in the area.
- Section 4.1.1.1, if customer is not present, SCG's employee is required to leave Form 2001 - Customer Communication Tag – Distribution

1.3 SCG's Gas Standard 142.02 Leak Investigation – Customer Service, Section 9.1, requires SCG's Customer Service Field personnel to use a company approved combustible gas indicator device while approaching any gas leak, to both determine and monitor the atmosphere to ensure customer and employee safety

SED found that SCG's employees failed to follow and comply with the requirement in SCG's Gas Standards. In addition, SED found that SCG's employees failed to communicate (poor communication) with each other, firefighter first responder, evaluate, and monitor site, coordinate/communicate with SCG, address the magnitude of the incident, and the hazardous condition. Therefore, SED found SCG in violation of General Order 112-F, Reference Title 49 CFR, Part 192, Section 192.605(a).

The summary of the identified violations are listed in Attachment A of this letter. Please provide a written response within 30 days of the date of this letter indicating the measures taken by SCG to address the violation. Pursuant to Commission Decision 16-09-055, SED staff has the authority to issue citations for each violation found.

If you have any questions, please contact Mahmoud (Steve) Intably at (213) 576-7016 or email: Mahmoud.intably@cpuc.ca.gov.

Sincerely,



Dennis Lee, P.E.
Program & Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

cc: [REDACTED] Sempra Energy Utilities
Kan-Wai Tong, SED
Claudia Almengor, SED

Attachment A
Incident with Probable Violations

| PUC ID | Date | Address | Utility | Third Party Entity | Investigative Findings | Code Violation(s) |
|----------------|-----------|---|---------|--------------------|--|---|
| G20190715-2857 | 7/15/2019 | <div style="background-color: black; width: 150px; height: 15px; margin-bottom: 5px;"></div> Murrieta, Riverside County, CA | SCG | N/A | 1. SED found that SCG's employees failed to follow and comply with the requirement in SCG's Gas Standards (total of three Gas Standards were violated) | 1. GO112-F, referenced 49 CFR, Part 192, Section 192.605(a) |