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November 1, 2019

Mr. Dennis Lee  
Program & Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Ave, 2nd Floor  
San Francisco, CA 94102

Dear Mr. Lee:

Attached are SoCalGas's written responses to the Safety and Enforcement Division's (SED) investigation for DOT #1252045 reportable incident that occurred on July 15, 2019. The SED investigation found that Southern California Gas Company's (SoCalGas) employees failed to follow and comply with the requirement in SoCalGas' Gas Standards.

Please contact [REDACTED] at [REDACTED] if you have any questions or need additional information.

Sincerely,

[REDACTED]

[REDACTED]  
[REDACTED]

cc: Claudia Almengor, SED  
Mahmoud Intably, SED  
Kan-Wai Tong, SED  
Rodger Schwecke, SoCalGas

## Incident Investigation that occurred on July 15, 2019

### 1) General Order 112-F, Reference Title 49 CFR, Part 192, §192.605(a)

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 SC03G'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).

**Response:**

SoCalGas commenced an investigation immediately following the incident. The ongoing investigation involves two separate inquiries: (1) the cause of the explosion; and (2) the adequacy of our current processes, procedures, and standards. The investigation has reached the preliminary conclusion that the cause of the explosion was damage to a [REDACTED] service pipe which occurred while a third-party contractor installed a grounding rod, piercing the service line and resulting in a leak and migration of gas into the residence. We have confirmed that a USA mark-out was required but not requested prior to the start of the work. In addition, as part of our investigation we identified Gas Standards 183.03 Field Guidelines - Emergency Incident Distribution/Customer Service and 184.0245 Leak Investigation which have been revised to enhance clarity and promote understanding by employees who respond to the types of incidents as outlined fully below.

**Corrective Actions:**

SoCalGas has revised the identified Gas Standards 183.03 Field Guidelines - Emergency Incident Distribution/Customer Service and 184.0245 Leak Investigation and published two Information Bulletins to add clarity to the procedures. The changes are listed in the attached Information Bulletins. In addition, these bulletins were reviewed by impacted management and non-management operations personnel.

Furthermore, situational training exercises have been added to SoCalGas' Centralized training curriculum for both Distribution and Customer Service employees. Finally, annual situational training exercises will be conducted at the districts with both Distribution and Customer Service departments to reinforce continued understanding of the procedures and requirements related to emergency incident response applicable gas standards.

**Attachments (2)**

SCG CUSTOMER SERVICE FIELD		Information Bulletin No. CSF190805	
Subject: Field Guidelines - Emergency Incident Distribution/Customer Service			
Publish Date: 08-21-19	Due Date: 08-30-19	NOP Code:	IBSC0294
Responsible Person: [REDACTED]		Phone: [REDACTED]	

**IMPACTED ORGANIZATIONS:** SoCalGas Customer Service Field Operations, Operations Training

**FIELD ACTION:**

**By COB 08-30-2019, District Management must discuss this Information Bulletin with impacted Management and Field Employees; all employees will complete their LMS assignment to document the Bulletin review**

**Note:** This Information Bulletin is an update to and replaces Information [Bulletin CSF190805](#) published on August 5, 2019.

**PURPOSE:**

- To clarify the procedure for when and how the First Qualified Employee on scene of an emergency incident transfers the emergency response responsibilities to another qualified employee.
- To reiterate and clarify the procedure for Company employees responding to emergency incidents involving escaping gas from a leak, line break, or damage (hit lines)
- To reiterate and clarify that incidents involving damaged company facilities, also known as “hit lines,” are defined as Emergency Incidents and must be addressed following the policies and procedures described in [GS 183.03](#)
- To clarify the procedure for the First Qualified Employee on scene of an emergency incident, including:
  - How to determine whether gas has migrated into surrounding building(s); and
  - Precautions to take when gas has migrated into surrounding building(s)
- To reiterate the procedure for communication with Fire and/or Police Departments on scene by Trained and Qualified Employees when responding to emergency incidents
- To reiterate and clarify the procedure for Trained and Qualified response crews when responding to emergency incidents, including:
  - Immediately assessing the potential hazards of the escaping gas;
  - Reviewing the status of the incident with the responsible Company employee on the scene; and
  - Proceeding with the safest method available when controlling escaping gas

**PROCEDURE OVERVIEW:**

- The First Qualified Employee dispatched to the scene of an emergency incident must perform each of the following steps:
  - Immediately conduct an onsite evaluation of the potential hazards to life and property resulting from escaping gas
  - Establish communications with fire and police departments on the scene as soon as possible
  - Determine the area limit where gas is present and make a perimeter check using a Company approved Combustible Gas Indicator (CGI) to determine if gas has

migrated into substructures or surrounding buildings, either through the ground or through the air

- Note: Leak indications of 60% LEL (2.7% Volume Gas) or greater detected at the outside wall or foundation of the surrounding building(s) must be treated as if gas has migrated underground into the building
- Note: Atmospheric readings of 20% LEL (0.9 % Volume Gas) or greater detected inside of buildings or structures requires evacuation of people and restrict entry into the premises

- 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
- Evacuate and restrict people from any hazardous areas, including buildings or structures, if the concentration of gas indicates ignition is a possibility. In addition:
  - Determine the need for rerouting or blocking of vehicular and pedestrian traffic
  - Use Evacuation Tape (Stock Code N399372) to delineate the potentially hazardous area from adjacent safe areas
  - Seek to eliminate and keep sources of ignition from restricted areas.
  - Check and periodically monitor perimeters of the area of hazard to determine if gas is migrating into surrounding buildings until escaping gas is controlled and conditions are no longer hazardous

**Note:** Additional follow up is required until indications under a building or tunnel, at the outside wall of a building, or where gas could potentially migrate to an outside wall of a building have diminished to a sustained level below 4,500 PPM or 10% LEL, see [GS 184.0245, Leak Investigation](#).

- The First Qualified Employee may transfer the action and hazard assessment responsibilities identified in section 4.2 of [GS 183.03](#) and reiterated above in this Information Bulletin to another qualified employee on scene only after:
  - Verbally confirming which of the requirements from [GS 183.03](#) he or she has taken with the relieving qualified employee, including what actions are still needed;
  - The relieving qualified employee on scene has verbally acknowledged what still needs to be completed, and assumed the emergency response responsibilities; and
  - The relieving qualified employee verbally relieved the First Qualified Employee.
- When the incident complexity exceeds the capabilities of the First Qualified Employee or is expected to exceed his or her capabilities, the First Qualified Employee must immediately request assistance from Dispatch for a more qualified employee.
- Emergency incidents involving damaged company facilities, also referred to as “hit lines,” must be investigated and repaired in accordance with the policies and procedure defined in [GS 183.03 Field Guidelines - Emergency Incident Distribution /Customer Service](#)
- If gas indications are noted and they reach a level of greater than 60% LEL (2.7% Volume Gas) (in the area that work will be performed), appropriate respiratory protective equipment and Gas Extraction Suit™ are required in the remote/weld hole. See [GS 166.0076, Working in Flammable Atmospheres](#)
- Control of gas at the point of discharge may only be considered after all control options have been exhausted and the following conditions have been met:

- Appropriate respiratory protective equipment and Gas Extraction Suit™ with all required personal protective equipment must be used
- The gas is blowing freely into the atmosphere, the work can be performed safely, and the escaping gas can safely be controlled with approved tools and equipment. This equipment may include, but is not limited to, clamps, various approved steel squeezing devices, various approved polyethylene PE squeezing devices, etc.

GS 183.03 *Field Guidelines - Emergency Incident Distribution/Customer Service* and GS 184.0245 *Leak Investigation* will be updated and published to provide clarification and guidance when responding to emergency incidents.

**REFERENCE(S):**

GS 183.03 *Field Guidelines - Emergency Incident Distribution /Customer Service*

GS 184.0245 *Leak Investigation*

GS 166.0076, *Working in Flammable Atmospheres*

If you have any questions or concerns, please contact [REDACTED] - Technical Advisor at [REDACTED], or email at [REDACTED]

NOTE: Do not alter or add any content from this page down; the following content is automatically generated.  
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Subject: <b>REVISED</b> Field Guidelines - Emergency Incident Distribution / Customer Service			
Publish Date: 08/22/2019	Due Date: 08/30/2019	NOP Code:	IBSC0351
Responsible Person: [REDACTED]		Phone: [REDACTED]	

IMPACTED ORGANIZATIONS: Gas Operations Distribution, Transmission, Operations Training, Customer Service

**ACTION REQUIRED:**

**District Management must discuss this Info Bulletin with impacted Management and Field Employees and document using Form 5300 by COB 08-30-2019.**

**Note: This Information Bulletin is an update to and replaces Information Bulletin No. INFO-1948 published on August 5, 2019.**

**PURPOSE:**

- To clarify the procedure for when and how the First Qualified Employee on scene of an emergency incident transfers the emergency response responsibilities to another qualified employee.
- To reiterate and clarify the procedure for Company employees responding to emergency incidents involving escaping gas from a leak, line break, or damage (hit lines).
- To reiterate and clarify that incidents involving damaged company facilities, also known as “hit lines,” are defined as Emergency Incidents and must be addressed following the policies and procedures described in [GS 183.03](#), *Field Guidelines - Emergency Incident Distribution /Customer Service*.
- To clarify the procedure for the First Qualified Employee on scene of an emergency incident, including:
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  - Immediately assessing the potential hazards of the escaping gas;
  - Reviewing the status of the incident with the responsible Company employee on the scene; and
  - Proceeding with the safest method available when controlling escaping gas.

**PROCEDURE OVERVIEW:**

- The First Qualified Employee dispatched to the scene of an emergency incident must perform each of the following steps:
  - Immediately conduct an onsite evaluation of the potential hazards to life and property resulting from escaping gas.



- Establish communications with fire and police departments on the scene as soon as possible.
- Determine the area limit where gas is present and make a perimeter check using a Company approved Combustible Gas Indicator (CGI) to determine if gas has migrated into substructures or surrounding buildings, either through the ground or through the air.

**Note: Leak indications of 60% LEL (2.7% Volume Gas) or greater detected at the outside wall or foundation of the surrounding building(s) must be treated as if gas has migrated underground into the building.**

**Note: Atmospheric readings of 20% LEL (0.9 % Volume Gas) or greater detected inside of buildings or structures requires evacuation of people and restrict entry into the premises.**

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- Evacuate and restrict people from any hazardous areas, including buildings or structures, if the concentration of gas indicates ignition is a possibility. In addition:
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  - Use Evacuation Tape (Stock Code N399372) to delineate the potentially hazardous area from adjacent safe areas.
- Seek to eliminate and keep sources of ignition from restricted areas.
- Check and periodically monitor perimeters of the area of hazard to determine if gas is migrating into surrounding buildings until escaping gas is controlled and conditions are no longer hazardous.

**Note: Additional follow up is required until indications under a building or tunnel, at the outside wall of a building, or where gas could potentially migrate to an outside wall of a building have diminished to a sustained level below 4,500 PPM or 10% LEL, see [GS 184.0245](#), *Leak Investigation*.**

- The First Qualified Employee may transfer the action and hazard assessment responsibilities identified in section 4.2 of [GS 183.03](#), *Field Guidelines - Emergency Incident Distribution /Customer Service* and reiterated above in this Information Bulletin to another qualified employee on scene only after:
  - Verbally confirming which of the requirements from [GS 183.03](#), *Field Guidelines - Emergency Incident Distribution /Customer Service* he or she has taken with the relieving qualified employee, including what actions are still needed;
  - The relieving qualified employee on scene has verbally acknowledged what still needs to be completed, and assumed the emergency response responsibilities; and
  - The relieving qualified employee verbally relieved the First Qualified Employee.
- When the incident complexity exceeds the capabilities of the First Qualified Employee or is expected to exceed his or her capabilities, the First Qualified Employee must immediately request assistance from Dispatch for a more qualified employee.
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  - The gas is blowing freely into the atmosphere, the work can be performed safely, and the escaping gas can safely be controlled with approved tools and equipment. This equipment may include, but is not limited to, clamps, various approved steel squeezing devices, various approved polyethylene PE squeezing devices, etc.

[GS 183.03](#), *Field Guidelines - Emergency Incident Distribution /Customer Service* and [GS 184.0245](#), *Leak Investigation* will be updated and published to provide clarification and guidance when responding to emergency incidents. If you have any questions or concerns, please contact [REDACTED] - Technical Advisor at [REDACTED], or email at [REDACTED]

**REFERENCES:**

[GS 183.03](#), *Field Guidelines - Emergency Incident Distribution /Customer Service*

[GS 184.0245](#), *Leak Investigation*

[GS 166.0076](#), *Working in Flammable Atmospheres*

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