

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 18, 2013

Bret Lane, Senior Vice-President
Southern California Gas Company
Gas Operations and System Integrity
555 W. Fifth Street, GT21C3
Los Angeles, CA 90013

GA2013-35

**SUBJECT: General Order (GO) 112-E Audit of Southern California Gas Company's
(SoCalGas) East Region Transmission**

Dear Mr. Lane:

The staff of the Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a GO 112-E audit of SoCalGas' East Region Transmission (Region) from April 8 – 19, 2013. The inspection included a review of the Region's records and field activities throughout the period of April 2012 – March 2013. SED staff also reviewed SoCalGas' operator qualification records and included field observations of randomly selected individuals performing covered tasks. SED's findings and recommendations are noted in the "Summary of Inspection Findings and Recommendations" (Summary).

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by SoCalGas to address the probable violation and recommendations noted in the Summary. Pursuant to Commission Resolution ALJ-274, SED staff has the authority to issue citations for each violation found during the audit. SED will notify SoCalGas of the enforcement action it plans to take after it reviews SoCalGas' audit response.

If you have any questions, please contact Jerry Palo Jr. at (213) 576-5719.

Sincerely,

A handwritten signature in blue ink that reads "Michael Robertson".

Michael Robertson, P.E.
Program Manager
Gas Safety & Reliability Branch
Safety and Enforcement Division (SED)

cc: Jerry Palo Jr., SED/GSRB

Summary of Inspection Findings & Recommendations

GO 112-E inspection of Southern California Gas Company East Area Transmission Region April 8 – 19, 2013

Findings

Title 49 Code of Federal Regulations (CFR) §192.751 – Prevention of accidental ignition, states:

Each operator shall take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion, including the following:

- (a) When a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided.*
- (b) Gas or electric welding or cutting may not be performed on pipe or pipe components that contain a combustible mixture of gas and air in the area of work.*
- (c) Post warning signs, where appropriate.*

SED conducted an inspection of mainline valves on Line 6916 and observed a SoCalGas Region employee light a cigarette within 20 feet of valve station 140.42 - 0 in Cabazon and inside valve station 120.00 in 29 Palms. Per SoCalGas procedure 166.015, Section 4.2, company personnel must control sources of ignition, not limited to cigarettes, within transmission and storage facilities. Smoking is prohibited inside the valve station in 29 Palms and within 50 feet outside the valve station in Cabazon. **Therefore, SoCalGas is in violation of GO 112-E, Reference Title 49 CFR Part §192.751**

Recommendations

1. SED observed the right-of-way for Line 2000 near Cabazon and noted several damaged pipeline markers. The pipeline markers were located between milepost (MP) 135.22 – MP153.98. The Region needs to install new pipeline markers at these locations at the earliest convenience.
2. SED observed the field testing of the audio and visual alarms of Compressor Plant 2 in Blythe station and found the alarms to be inaudible. In addition, the visual alarms outside the station blended with the sunlight, further reducing their visibility. SED recommends that SoCalGas upgrade the audio and visual alarms for Compressor Plant 2 in Blythe Station.
3. SED recommends that SoCalGas modify its procedures to clarify the operation of transmission crossover and bypass valves. SED recommends adding a guideline of station valve conditions in SoCalGas FCD 223.0215.
4. SED recommends improving the communication protocol between Baja Norte and SoCalGas regarding delivery of natural gas at Blythe station from Baja Norte. SED observed several recorded high-alarms across the valve connecting both pipelines.