

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

October 19, 2023

GI-2023-07-SCG-40-10

Mr. Rodger Schwecke  
Senior Vice President and Chief Infrastructure Officer  
Southern California Gas Company  
555 West 5th Street, GT21C3  
Los Angeles, CA 90013

**Subject: G.O. 112-F Compliance Inspection of SoCalGas CRM program**

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) conducted a General Order (G.O.) 112-F Inspection of Southern California Gas Company (SoCalGas)'s Control Room Management (CRM) program on July 10 through 14, 2023. SED staff reviewed SoCalGas' written CRM procedures and related records for calendar years 2019 through 2022 and conducted field observations of SoCalGas' primary and back-up control rooms, pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (CFR), Parts 191 and 192. During the inspection, SED's staff used the Pipeline and Hazardous Materials Safety Administration's (PHMSA) Inspection Assistance (IA) system as a reference guide.

SED's staff did not identify any probable violations of G.O. 112-F but noted eleven (11) areas of concern, which are described in the attached "Post-Inspection Written Preliminary Findings" report. On August 25, 2023, SoCalGas provided its responses to address the 11 concerns that SED noted. SED completed its review of the responses that SoCalGas provided.

Since SoCalGas provided a response and adequately addressed the 11 concerns that SED noted, this letter will serve as both the inspection letter and the official closure letter of the 2023 Inspection of SoCalGas' CRM program.

If you have any questions, please contact Sann Naing, Senior Utilities Engineer (Specialist) at (213) 266-4723 or by email at sn1@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng".

Terence Eng, P.E.  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

CC: Sann Naing, SED/GSRB  
Matthewson Epuna, SED/GSRB  
Claudia Almengor, SED/GSRB  
Alex Hughes, SCG

# Post-Inspection Written Preliminary Findings

**Dates of Inspection:** 7/10/2023 to 7/14/2023

**Operator:** SOUTHERN CALIFORNIA GAS CO

**Operator IDs:** 18484 (primary) 18112

**Inspection Systems:** SoCalGas Control Room Management program

**Assets (Unit IDs) with results in this report:** SoCalGas CRMP (88388 88389)

**System Type:** GT

**Inspection Name:** 2023 SCG CRM

**Lead Inspector:** Sann Naing

**Operator Representative:** Austin Walker

## Unsatisfactory Results

**No Preliminary Findings.**

## Concerns

### CRM, SCADA, and Leak Detection : CRM Roles and Responsibilities (CR.CRMRR)

Question Title, ID Roles and Responsibilities, CR.CRMRR.RESPONSIBLE.P

Question 1. Are there clear processes to describe each controller's physical domain of responsibility for pipelines and other facility assets?

References 192.631(b)

Assets Covered SoCalGas CRMP (SCG CRM)

Issue Summary During its inspection, SED observed Southern California Gas Company's (SoCalGas) primary control room had one (1) qualified Control Room Supervisor and two (2) qualified Controllers. However, SoCalGas' current CRM Plan, Roles, Authorities, and Responsibilities Procedure for Control Room Personnel (Last revised on 5/24/2023) defines the roles and responsibilities for gas Control Supervisor and Controller, but it does not define each controller's specific roles and responsibilities when there are 2 or more Controllers in a control room.

SoCalGas Control Room Management (CRM) team explained that it requires one control room supervisor and one controller on-duty at any given point in time and the company is in the process of expanding the staffing and operations to three operators on-duty at any given point in time (1 supervisor and 2 controllers). The SoCalGas' CRM team stated and presented to SED's staff a written draft of the CRM Procedures to define the roles and responsibilities of each Controller when the control room is staffed with 2 or more controllers. SoCalGas also stated that

its controller at each control console has the control capability on entire pipeline assets that its control room controls.

SED recommended SoCalGas to finalize the draft and make it effective to eliminate the possible confusion on control activities during normal, abnormal, and/or emergency conditions.

On August 25, 2023, SoCalGas provided the following response to SED:

*"SoCalGas agrees with the SED recommendation to finalize its draft of the Control Room Management Plan, Section 2, Part 1, Roles and Responsibilities, which defines the roles and responsibilities of operators when 4 consoles (1 supervisor, 3 controllers) are being utilized during a control room shift. Per the 8/11/2023 draft, Controller #1 has the primary responsibility to control and maintain the integrity of the entire Gas Transmission and Distribution systems equipped with SCADA telemetry capability during normal, abnormal, and emergency conditions. Controller #2 and Controller #3 are responsible for secondary non-operational activities such as answering phones, closing logs, completing alarm reconciliation analyses, preparing routine reports, training, etc.). However, Controller #2 and Controller #3 may assist with Controller #1 responsibilities when system conditions warrant it provided they obtain approval from the Gas Control Supervisor beforehand. In such cases, the Supervisor will be responsible for assigning specific primary operational tasks to Controller #2 and Controller #3 as to avoid possible confusion over control room responsibilities. In all circumstances during a shift, Controller #2 and Controller #3 will work closely with and maintain continuous communication with Controller #1 and the Gas Control Supervisor to ensure that the pipeline system operates smoothly.*

*To prepare for this, Gas Control plans to conduct a 30-day implementation trial run of the policy draft to identify potential opportunities for policy improvement. After this trial run has been completed, the policy draft will be finalized for publication in the 4<sup>th</sup> quarter of 2023."*

SED reviewed SoCalGas' response and accepts the proposed plan to define each controller's respective roles and responsibilities when SoCalGas uses two or more Controllers in a control room. No further response is required from SoCalGas at this time. However, SED may review SoCalGas' revised procedure for Roles and Responsibilities of controllers during future inspections.

Question Title, ID Shift Change Process - Documentation, CR.CRMRR.HANDOVERDOC.R

Question 14. Are there records that document the hand-over of responsibility, document the time the actual hand-over of responsibility occurs, and the key information and topics that were communicated during the hand-over?

References 192.631(b)(4) (192.631(c)(5))

Assets Covered SoCalGas CRMP (SCG CRM)

Issue Summary SoCalGas CRM Plan, Control Room Shift Turnover procedure (last revised on 2/7/2023) requires that the outgoing and incoming personnel both approve shift turnover report, which was logged in the J5 system (SoCalGas' Electronic Logging Software). However, during review of shift turnover summary (Handover logbook, a spreadsheet generated from J5), SED noted some conflicting data information. For example, while a shift turnover status is shown as "complete", incoming and outgoing personnel columns in the report were shown as "Not Approved".

SoCalGas' CRM team said that it was J5 system's technical issue causing false information and was able to provide actual shift turnover records, which showed both incoming and outgoing personnel's approvals. For consistent and accurate data information in records, SED recommended that SoCalGas remediate data reporting/generating issues, such as the J5 turnover summary log issue.

On August 25, 2023, SoCalGas provided the following response to SED:

*"In response to the SED recommendation to remediate the inaccurate data extracted from the J5 electronic logging system, SoCalGas has implemented a new procedure to manually download every actual shift turnover report as a PDF and save the reports on Gas Control's internal servers as an official record. The instructions for completing this process have been added to the "Hours of Service Review – Best Practices" document referenced in the Control Room Management Plan, Section 4, Part 1, Gas Control Schedule Policy. In addition,*

*SoCalGas has retroactively downloaded and saved every shift turnover report that was generated in J5 since its implementation date (10/15/2019 to present)."*

SED reviewed SoCalGas' response and accepts its proposed new procedure and corrective actions that it has articulated and implemented. No further response is required from SoCalGas at this time. However, SED may review SoCalGas' updated procedures and related records on this area during future inspections.

## **CRM, SCADA, and Leak Detection : Supervisory Control and Data Acquisition (CR.SCADA)**

Question Title, ID SCADA API RP 1165 Human Factors, CR.SCADA.1165HUMANFACTORS.O

Question 3. Has section 4 of API RP 1165 regarding human factors engineering been implemented?

References 192.631(c)(1)

Assets Covered SoCalGas CRMP (SCG CRM)

Issue Summary API RP 1165 Recommended Practice for Pipeline SCADA Displays, Section 4 Human Factors Engineering Considerations in Display Design states in part:

*"Displays should be designed to provide optimum transfer of information to the user. Information should be presented simply and consistently, in a well-organized manner, and in expected locations. Generally speaking, displays should have an orderly and clutter-free appearance, a simple way to navigate through the system, and obvious indications of interrelationships."*

On July 11, 2023, SED observed the remote desktop view of the SCADA display used by SoCalGas CRM personnel and noted that, when controllers are viewing the SCADA display on their laptops, the display/text is very condensed and hard to read. In addition, the ability to navigate the display is difficult due to the controller not being able to view the entire display in its entirety. SED recommends SoCalGas consider looking into how the CRM personnel can easily view and navigate the SCADA display while using a laptop.

In addition, SED noted that the SCADA font sizes appeared to be somewhat small on the SCADA screen selection list and header buttons on its native resolution/aspect ratio during observations at the back-up control room on July 13, 2023. SED recommended SoCalGas consider looking into increasing the font sizes on the SCADA display in order to make the displays easier to read.

On August 25, 2023, SoCalGas provided the following response:

*"In response to the SED recommendation to look into how controllers can easily view and navigate SCADA screens while using a laptop, SoCalGas investigated this and found the display issues were caused by a laptop's default display setting which was set at a 200% zoom. When the display setting was adjusted to 100%, the SCADA screens displayed on the laptop computer monitor were less condensed, were easier to read, and were displayed in their entirety. This was tested successfully on both older and newer laptop models. To address this issue moving forward, SoCalGas has updated the Control Room Management Plan, Section 3, Part 1, Implementing SCADA Requirements of API 1165, to include instructions on adjusting laptop display settings. Gas Control personnel were also notified of these instructions."*

*In response to the SED recommendation that the font size is too small on the SCADA screen menu buttons and screen selection lists, SoCalGas will increase the font size within the SCADA menu buttons and screen selection lists by using text abbreviations and increasing the size of menu button object displays. These actions will make the embedded text easier to read by circumventing the "shrink to fit" feature used in the SCADA HMI system, a feature designed to reduce font size so text fits within an object display. This action item is slated for completion in the 4th quarter of 2023."*

SED reviewed SoCalGas' response and accepts its proposed corrective actions that it has articulated and implemented. No further response is required from SoCalGas at this time. However, SED may review SoCalGas' updated procedures and revisit these areas during future inspections.

Question Title, ID SCADA Display Objects, CR.SCADA.DISPLAYOBJECTS.O

Question 4. Has section 8 of API RP 1165 regarding display object characteristics been implemented?

References 192.631(c)(1)

Assets Covered SoCalGas CRMP (SCG CRM)

Issue Summary API RP 1165 Recommended Practice for Pipeline SCADA Displays, Section 8.2.3 Meaning of Colors states in part:

*"When a particular color has multiple meanings it loses both its attention-getting quality and may lead to confusion or controller error, especially under stress. Therefore, selected colors should be consistent across all types of displays"*

On July 11, 2023, SED observed the remote desktop view of the SCADA display used by SoCalGas CRM personnel and noted that the color legend located at the top of the SCADA display had three items labeled with the same color. The abbreviated category menu items OPS, RTU scan, and SDG&E all used the same shade of blue as an identifying color. SED recommended that SoCalGas consider using different identifying colors for different items, as possible, to avoid confusion.

On August 25, 2023, SoCalGas provided the following response:

*"In response to the SED recommendation to consider selecting different identifying background colors for the OPS, RTU Scan, and SDG&E menu display buttons, SoCalGas will keep the SDG&E menu button as dark blue and will select different contrasting colors for the OPS and RTU Scan menu buttons. The background colors to be used will also be different than the other menu button colors that are already in use within the SCADA HMI system. This action item is slated for completion in the 4<sup>th</sup> quarter of 2023."*

SED reviewed SoCalGas' response and accepts its proposed corrective actions that it has articulated and implemented. No further response is required from SoCalGas at this time. However, SED may review and verify the changes during future inspections.

Question Title, ID Point-to-Point Verification Extent, CR.SCADA.POINTVERIFYEXTENT.R

Question 13. Do records demonstrate adequate thoroughness of the point-to-point verification?

References 192.631(c)(2)

Assets Covered SoCalGas CRMP (SCG CRM)

Issue Summary SoCalGas CRM Plan, Appendix 2: Verification/Validation between Field and SCADA Operating Screens (last revised on 5/4/2023), Section 2 requires verifying unit of measure for points being verified. During review of SoCalGas Point to Point (P2P) verification records, SED noted that the SCADA values and field values in the records do not show units of measure associated with them. SED suggested SoCalGas show the units of data in its records that were being verified.

On August 25, 2023, SoCalGas provided the following response:

*"SoCalGas agrees with the SED recommendation to verify units-of-measure in its records while performing point-to-point verifications. As such, SoCalGas will update the point-to-point verification SCADA screen with the following information fields: a textbox identifying the unit-of-measure being used, and a verification checkbox that confirms the unit-of-measure used is correct. In addition, a unit-of-measure column will be added to the SCADA point-to-point verification database to capture this information within Gas Control's records. This action item is slated for completion in the 4<sup>th</sup> quarter of 2023."*

SED reviewed SoCalGas' response and accepts its proposed corrective actions that it has articulated and implemented. No further response is required from SoCalGas at this time. However, SED may review and verify the changes during future inspections.

## **CRM, SCADA, and Leak Detection : Fatigue Management (CR.CRMFM)**

Question Title, ID Fatigue Quantification, CR.CRMFM.FATIGUEQUANTIFY.P

Question 3. Do processes require that the potential contribution of controller fatigue to incidents and accidents be quantified during investigations?

References 192.631(d)

Assets Covered SoCalGas CRMP (SCG CRM)

Issue Summary SoCalGas CRM Plan, Reviewing of Reportable Incidents procedure (last revised on 6/6/2023) requires the use of the "Incident Review" form to identify and record pertinent cause and effect information about reportable incidents. On the Incident Review Form 2023 (last revised on 5/8/2023), there are several fields and form appendices pertaining to potential controller fatigue. Per conversations with CRM Senior Compliance Advisor, this includes gathering information from on-shift controllers through the Incident Review Form 2023 - Controller Fatigue Survey.

1. SED recommended including or referencing this process and procedures in the SoCalGas' Control Room Fatigue Mitigation - Procedure and Practices.
2. In addition, SED recommended that SoCalGas include in its written procedure the practice of Reviewing of Reportable Incidents to administer the on-shift controllers Incident Review Form - Controller Fatigue Survey. While this is the practice used by Gas Control/ Operations as explained by CRM team, it is not currently written in the procedure itself.

On August 25, 2023, SoCalGas provided the following response:

*"SoCalGas agrees with the SED recommendation to include a reference to the Incident Review investigation process within the SoCalGas Fatigue Management Plan. As such, SoCalGas has updated the Control Room Management Plan, Section 4, Part 2, Fatigue Management Plan, to include a link to the Incident Review process as defined in CRMP Section 7, Part 1, Operating Experience.*

*SoCalGas also agrees with the SED recommendation to include instructions for administering the Incident Review Controller Fatigue Survey during an incident review. As such, SoCalGas has updated the Control Room Management Plan, Section 7, Part 1, Operating Experience, to include these instructions."*

SED reviewed SoCalGas' response and accepts its proposed corrective actions that it has articulated and implemented. No further response is required from SoCalGas at this time. However, SED may review SoCalGas' updated procedures during future inspections.

Question Title, ID Number of Qualified Controllers, CR.CRMFM.CONTROLLERNUMBERS.O

Question 17. Do operations include a sufficient number of qualified controllers?

References 192.631(d)

Assets Covered SoCalGas CRMP (SCG CRM)

Issue Summary During discussions with SoCalGas CRM team, SED was made aware that SoCalGas was in the process of training additional on-shift controllers to sufficiently cover 3 operators on shift at any given time. Based on the Minimum Control Room Staffing Analysis 2023 SoCalGas conducted, SoCalGas currently has 15 on-shift operator qualified controllers, with 5 additional controllers in training as of March 15, 2023. The CRM team verified that the supplemental on-shift operator qualified controllers in training remained the same on July 13, 2023. SoCalGas stated that it requires 2 operators on-duty at any given point in time, so at minimum there are always 2 consoles in use, which requires 12 on-shift operators to be considered fully staffed per its minimum staffing analysis. SoCalGas indicated that it is in the process of expanding the staffing and operations to 3 operator qualified controllers on-duty at any given time (1 supervisor and 2 controllers). As such, to meet its upcoming operational capabilities for 3 consoles, SoCalGas will need 17 on-shift operator qualified controllers.

SED requested the update (including projections) on Gas Control's training progress and staffing status (e.g., roster) of on-shift operator qualified controllers.

On August 25, 2023, SoCalGas provided the following response:

*"In response to the SED request for an update on Gas Control's training progress of new hire controllers, 4 prospective controllers are tentatively scheduled to finish the 9 online training modules in gas control operations by the end of July 2023, and in turn, begin their "On-the-job" on-shift training in August 2023. Prospective controllers are expected to participate in this training element for approximately 3 to 4 months before taking the operator qualification test in Task 04.02, Remotely starting, operating, shutting down gas compressor units, valves, or pipelines. As such, it is expected for the 4 prospective controllers to*

become operator qualified by December 2023. Gas Control also has 1 prospective controller who started the "On-the-job" training element in 2022, however, they have been on extended medical leave. Currently there is no definitive timeline on when they will return to work to resume their training.

In response to the SED request for a roster of on-shift operator qualified controllers, see the following list of on-shift operators who are operator qualified in Task 04.02, and the employees who are currently in training to be operator qualified in Task 04.02.

On-Shift Operator Qualified Controllers

1. Employee ID: [REDACTED], Gas Control Supervisor
2. Employee ID: [REDACTED], Gas Control Supervisor
3. Employee ID: [REDACTED], Gas Control Supervisor
4. Employee ID: [REDACTED], Gas Control Supervisor
5. Employee ID: [REDACTED], Gas Control Supervisor
6. Employee ID: [REDACTED], System Gas Controller
7. Employee ID: [REDACTED], System Gas Controller
8. Employee ID: [REDACTED], System Gas Controller
9. Employee ID: [REDACTED], System Gas Controller
10. Employee ID: [REDACTED], System Gas Controller
11. Employee ID: [REDACTED], System Gas Controller
12. Employee ID: [REDACTED], System Gas Controller
13. Employee ID: [REDACTED], System Gas Controller
14. Employee ID: [REDACTED], System Gas Controller
15. Employee ID: [REDACTED], System Gas Controller

Prospective Controllers

16. Employee ID: [REDACTED], System Gas Controller
17. Employee ID: [REDACTED], System Gas Controller
18. Employee ID: [REDACTED], System Gas Controller
19. Employee ID: [REDACTED], System Gas Controller
20. Employee ID: [REDACTED], System Gas Controller

SED reviewed SoCalGas' response and no further response is required from SoCalGas at this time. However, SED may review SoCalGas' employment of control room personnel during future inspections.

Question Title, ID Deviations from HOS Limits, CR.CRMFM.HOSDEVIATIONS.P

Question 21. Is there a formal process for approving deviations from the maximum HOS limits?

References 192.631(d)(4)

Assets Covered SoCalGas CRMP (SCG CRM)

Issue Summary SoCalGas CRM Plan, Shift Rotations / On-Call Assignments and Procedure (last revised on 5/30/2023) attempts to address the process for approving deviations from the maximum Hours of Service (HOS) limits. However, a reference to additional information on "Managing Fatigue during Hours of Service Deviations" on pages 7-9 directs the reader to a hyperlink. The hyperlink directs the reader to the "Extraordinary or Emergency situations" section, instead of "Managing Fatigue during Hours of Service Deviations" section. SED requested that SoCalGas verify the reference and ensure the hyperlink works as it was intended to clarify the context of procedure.

In addition, if the CRM Plan and HOS Deviation Justification Form is meant to document all cases of HOS deviations as described under the HOS deviations process (pgs. 7-9), the reference to the form should be for the entire document, not only under the Extraordinary or Emergency situations section.

On August 25, 2023, SoCalGas provided the following response:

*"SoCalGas agrees with the SED recommendation to revise the reference text and hyperlink within the Control Room Management Plan, Section 4, Part 1, Gas Control Schedule Policy. As such, the section titled "Extraordinary or Emergency Situations" has been retitled "Tracking Hours of Service." In addition, this section of the CRMP has been reorganized so hours of service guidelines are explained within this section. Furthermore, subtitles such as "Monitoring HOS", "Approving HOS Deviations", "Managing Fatigue During HOS Deviations" and "Documenting HOS Deviations" were added within this section for clarity. Lastly, it was verified that the referenced hyperlink directs readers to the subsection titled "Managing Fatigue During Hours of Service Deviations"."*

SED reviewed SoCalGas' response and accepts its proposed corrective actions that it has articulated and implemented. No further response is required from SoCalGas at this time. However, SED may review SoCalGas' updated procedures during future inspections.

## **CRM, SCADA, and Leak Detection : Alarm Management (CR.CRMAM)**

Question Title, ID Monitoring Work Load, CR.CRMAM.WORKLOADMONITORING.P

Question 15. Is the process of monitoring and analyzing general activity comprehensive?

References 192.631(e)(5)

Assets Covered SoCalGas CRMP (SCG CRM)

Issue Summary SoCalGas CRM Plan, SCADA - Gas Control Operations Room Alarm Management Plan and Philosophy procedure (Last revised on 6/7/2023), Workload time analysis, Section D indicated that Key Performance Indicator (KPI) data will be extracted from the operating data base from July 1 to July 31. However, per review of SoCalGas Workload Analysis template data (2/6/2023), SED noted that, in practice, the Workload Analysis draws data from a sample set composed of January, April, and July alarm data. SED recommended revising the procedure to match current practice requirements.

On August 25, 2023, SoCalGas provided the following response:

*"SoCalGas agrees with the SED recommendation to revise the Control Room Management Plan, Section 5, Part 1, Appendix 8, Workload Analysis Procedure, to include sample sets from January and April when reviewing Key Performance Indicator data. As such, SoCalGas has updated this procedure to include this expanded dataset."*

SED reviewed SoCalGas' response and accepts its proposed corrective actions that it has articulated and implemented. No further response is required from SoCalGas at this time. However, SED may review SoCalGas' updated procedures during future inspections.

Question Title, ID Alarm Deficiency Resolution, CR.CRMAM.DEFICIENCIES.P

Question 18. Is there a process to address how deficiencies found in implementing 192.631(e)(1) through 192.631(e)(5) will be resolved?

References 192.631(e)(6)

Assets Covered SoCalGas CRMP (SCG CRM)

Issue Summary 1. SoCalGas CRM Plan, SCADA - Gas Control Operations Room Alarm Management Plan and Philosophy procedure (last revised on 6/7/2023), Gas Control Management Responsibilities section requires an annual review of the entire alarm process and alarm management document. This review documents records "any document improvement, revision, or deficiencies found" in the Alarm Management Review Template. However, the current version of the Alarm Management Review Template (last revised on 1/27/2023) does not include a form section or field to identify and record the deficiencies found.

SED recommended SoCalGas to incorporate a section/field identifying and addressing deficiencies found in implementing the alarm management plan.

2. In addition, further discussion with the Senior Compliance Advisor found that the Alarm management review date records the timeframe of the review period rather than when the review was conducted. While demarcating the review period is necessary in establishing the scope of the annual review, the information (captured in practice) does not demonstrate whether the review is being conducted per the written process (i.e., procedure, template).

SED recommended that the Alarm Management Annual Review Record Template should be revised to more clearly differentiate between the time frame/scope of the review and the start (and/or completion) of the review itself.

On August 25, 2023, SoCalGas provided the following response:

*"SoCalGas agrees with the SED recommendation to revise the Alarm Management Review*



*Template to include a form section that identifies deficiencies found. As such, Gas Control has updated this template to include a section that identifies deficiencies found in the alarm management program along with the date these deficiencies are found.*

*SoCalGas also agrees with the SED recommendation to revise the Alarm Management Review Template to clearly differentiate between the timeframe/scope of the review and the start and completion dates of the formal review. As such, Gas Control has updated this template to include the following line items that are to be filled in by the reviewer: "Timeframe under Review", "Start of Review", and "Completion of Review".*

SED reviewed SoCalGas' response and accepts its proposed corrective actions that it has articulated and implemented. No further response is required from SoCalGas at this time. However, SED may review SoCalGas' updated procedures during future inspections.

## **CRM, SCADA, and Leak Detection : Training (CR.CRMTRAIN)**

Question Title, ID Control Room Team Training - Exercises, CR.CRMTRAIN.TEAMTRAINEXERCISE.R

Question 18. Do records indicate that training exercises were adequate and involved at least one qualified controller?

References 192.631(h)(6)

Assets Covered SoCalGas CRMP (SCG CRM)

Issue Summary SoCalGas CRM Plan, Training Guidelines procedure (Last revised on 5/24/2023) states that team training and exercises include both controllers and other individuals who would reasonably be expected to operationally collaborate with control room personnel during normal, abnormal, or emergency situations. SoCalGas also identified the other individuals in its Guidelines document as well. Team training materials consist of live training presentations, live training table-top exercises, and virtual self-paced training presentations.

During discussion with SoCalGas' CRM team, SED learned that training information and invitations are sent out to all individuals involved in gas control operations, the training was conducted in accordance with its guidelines, and the attendance was recorded. SoCalGas should compare the list of individuals invited to the list of attendees to ensure that all identified individuals completed the required trainings and exercises. SoCalGas' CRM must ensure all control room personnel and other individuals who would reasonably be expected to operationally collaborate with control room personnel complete the required trainings and exercises. The CRM program should track these metrics.

On August 25, 2023, SoCalGas provided the following response:

*"In response to the SED recommendation that the CRM program should be tracking training completion of all individuals who are identified to take Gas Control's Team Training program, per the SoCalGas Code of Business Conduct employees are required to complete compliance training and to acknowledge understanding of policy. Those with leadership roles, such as direct supervisors, have the added responsibility to ensure that the people who report to them understand the Company's expectations for legally compliant and ethical behavior. Given this, it is the responsibility of an employee's direct supervisor to ensure employees complete their assigned training which includes Gas Control's Team Training elements.*

*With that noted, Gas Control recognizes this supervisor responsibility outlined within corporate governance is not clearly defined within the Control Room Management Plan. As such, the CRMP will specify this responsibility as well as provide a link to Sempra's Code of Business Conduct.*

*In addition, if any identified employee does not attend one of the five scheduled live Team Training Exercises, the Gas Control Compliance and Training Department will identify those employees and assign the Team Training Exercise as a self-paced virtual module for employees to review and acknowledge understanding on the company's Learning Management System. The details explaining this process will be added to the Control Room Management Plan, Section 8, Part 1, Training Guidelines."*

SED reviewed SoCalGas' response and accepts its proposed corrective actions that it has articulated and implemented. No further response is required from SoCalGas at this time. However, SED may review SoCalGas' updated procedures during future inspections.