



**Alex Hughes**  
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June 27, 2024

Mr. Terence Eng, P.E.,  
Program Manager, 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. Eng:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a **General Order (G.O.) 112-F Comprehensive Operation and Maintenance Inspection of San Diego Gas & Electric (SDG&E)'s Miramar Transmission Area (Inspection Unit)** on March 11 through 15, 2024 and March 18 through 22, 2024. The inspection included a review of Inspection Unit's operation and maintenance records for 2020 through 2023, and a field inspection of a representative sample of the Inspection Unit's facilities. SED's staff also reviewed the implementation of SDG&E's Operator Qualification program, which included field observation of randomly selected individuals performing covered tasks.

SED staff did not identify any probable violation of G.O. 112-F, Reference Title 49 CFR, Parts 192, but noted one (1) areas of concern.

Please contact Alex Hughes at (213) 671-1344 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", with a stylized flourish extending to the right.

Alex Hughes  
Pipeline Safety and Risk Mitigation Manager

CC:

Larry Andrews, SoCalGas  
Mahmoud Intably, GSRB  
Kan-Wai Tong, GSRB  
Jesus Reyes, GSRB  
Claudia Almengor, GSRB

## 2024 SDG&E Miramar Transmission Audit Response

### Concern(s):

#### Maintenance and Operations: Gas Pipeline Abnormal Operations (MO.GOABNORMAL)

1. Question Title, ID	Abnormal Operations, MO.GOABNORMAL.ABNORMAL.R
Question	Did personnel respond to indications of abnormal operations as required by the process?
References	192.605(a) (192.605(c)(1))
Assets Covered	Transmission (87058 (48))
Issue Summary	<p><b>Issue Summary: Title 49, CFR Part 192, Section 192.605(a) states:</b></p> <p><i>"Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response...."</i></p> <p><b>SDG&amp;E Gas Standard T8167 Valve Inspection and Maintenance-Transmission, Section 4.3.1 states:</b></p> <p><i>"Valve casings and/or boxes found to be damaged or inaccessible are repaired or raised as soon as practical."</i></p> <p>During records review of SDG&amp;E Miramar Transmission Area, SED found that transmission line valve #1164 had a valve casing/box with a broken lid and frame since SDG&amp;E's 2020 valve inspection.</p> <p>According to SDG&amp;E, it is awaiting permits to make repairs to the lid and frame. SDG&amp;E is expected to complete the repair in Q4 2024.</p> <p>SED recommends SDG&amp;E to provide a copy of the work order repair completion and photos of the newly installed lid and frame.</p>

### Response:

SDG&E has replaced the broken lid and frame for Valve #1164 under work order #300000712078.