

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 28, 2024

GI-2024-03-SDGE-48-01

Mr. Rodger Schwecke
Senior Vice President and Chief Infrastructure Officer
San Diego Gas & Electric
555 West 5th Street, GT21C3
Los Angeles, CA 90013

Dear Mr. Schwecke:

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. SED used the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety's "Inspection Assistant Form" as a reference guide to conduct the inspection. 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's staff did not identify any probable violations of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, but noted one (1) area of concern which is described in the attached "Post-Inspection Written Preliminary Findings".

Please provide a written response within 30 days of your receipt of this letter indicating the measures taken by SDG&E to address the concerns noted in the "Post-Inspection Written Preliminary Findings".

Thank you for your cooperation in this inspection. If you have any questions, please contact Jesus Reyes at (213) 264-9087 or by email at JEY@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, reading "Terence Eng", is positioned above the typed name and title.

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

Attachments: see Post-Inspection Written Preliminary Findings
cc: see next page.

Alex Hughes, Pipeline Safety and Risk Mitigation Manager
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Claudia Almengor
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Gas Safety and Reliability Branch
Safety and Enforcement Division

Post-Inspection Written Preliminary Findings

Dates of Inspection: 03/11/2024 to 03/15/2024 and 03/18/2024 to 03/22/2024

Operator: SAN DIEGO GAS & ELECTRIC CO

Operator ID: 18112 (primary)

Inspection Systems: Miramar Transmission District and transmission assets in Beach Cities, Construction Metro, Eastern, North Coast Distribution districts

Assets (Unit IDs) with results in this report: Miramar Transmission Area (87058)

System Type: GT

Inspection Name: SDG&E Transmission- Miramar

Lead Inspector: Jesus Reyes

Operator Representative: Austin Walker, James Cervantes, Carlos Chavez

Unsatisfactory Results

No Preliminary Findings.

Concerns

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

Question Title, ID Abnormal Operations, MO.GOABNORMAL.ABNORMAL.R

Question2. 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: Title 49, CFR Part 192, Section 192.605(a) states:

"Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response...."

SDG&E Gas Standard T8167 Valve Inspection and Maintenance-Transmission, Section 4.3.1 states:

"Valve casings and/or boxes found to be damaged or inaccessible are repaired or raised as soon as practical."

During records review of SDG&E Miramar Transmission Area, SED found that transmission line valve #1164 had a valve casing/box with a broken lid and frame since SDG&E's 2020 valve inspection.

According to SDG&E, it is awaiting permits to make repairs to the lid and frame. SDG&E is expected to complete the repair in Q4 2024.

SED recommends SDG&E to provide a copy of the work order repair completion and photos of the newly installed lid and frame.