

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 8, 2021

Non-DOT 2020 Q2-Q3

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

Dear Mr. Schwecke,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) reviewed Southern California Gas Company (SoCalGas)'s response letter dated June 15, 2021, addressing two (2) violations identified by SED during its investigation of non-DOT reportable incidents that occurred during January 13, 2020, through February 3, 2020.

Attached is a summary of SED's investigation findings, SoCalGas's response to SED's findings, and SED's evaluation of SoCalGas's response to the probable violations.

This letter serves as official closure and any matters that are being considered for enforcement will be processed through the Commission's Citation Program or formal proceeding.

Thank you for your cooperation in these investigations. If you have any questions, please contact Molla Mohammad Ali, Senior Utilities Engineer (Supervisor), at (916) 928-2109 or by email at [ma5@cpuc.ca.gov](mailto:ma5@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Mahmoud Intably".

Mahmoud (Steve) Intably, P.E.  
Program and Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

Attachment

cc: See next page

Troy Bauer, Manager  
Pipeline Safety and Compliance  
Southern California Gas Company  
555 West 5<sup>th</sup> Street  
Los Angeles, CA 90013

Gwen Marelli, Senior Director  
Safety Management Systems  
Southern California Gas Company  
555 West 5<sup>th</sup> Street  
Los Angeles, CA 90013

Jason Corsey, Chief of Investigations  
California Dig Safe Board  
2251 Harvard Street Suite 400  
Sacramento, CA 95815

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

Kan-Wai Tong, P.E.  
Senior Utilities Engineer (Supervisor)  
Safety and Enforcement Division

M. Mohammad Ali, Ph.D., PE  
Senior Utilities Engineer (Supervisor)  
Safety and Enforcement Division

Claudia Almengor  
Associate Governmental Program Analyst  
Safety and Enforcement Division

## **Non-DOT Reportable Incidents**

### **Identified Probable Violations**

#### **1. General Order (G.O.) 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, §192.605(a) states in part:**

*(a) “General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response....”*

On January 13, 2020, at approximately 0755 hours, SoCalGas was notified of an under-pressure event at 2100 E. Cross Ave., Tulare that resulted in service interruption to 18 customers for approximately 26.5 hours. On January 8, 2020, SoCalGas’s crew was performing an annual inspection (to check and service) on a distribution plug valve # 38-543-150. SoCalGas’ crew encountered an Abnormal Operating Condition (AOC) (hard to operate) while exercising the valve and failed to return the valve to its original position “As Found” condition (fully open position) resulting in an under-pressure event and service interruption to SoCalGas customers. SED investigation found that SoCalGas’ crew failed to follow SoCalGas’ Gas Standard 184.16 – Valve Inspection and Maintenance – Distribution, §4.2 to return the valve to the “As Found” condition (fully open position). Therefore, SED finds SoCalGas in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a) for failure to follow Gas Standard 184.16 to return the valve to the “As Found” condition (fully open position) after completing the annual inspection.

#### **SoCalGas’ Response:**

SoCalGas acknowledges that Valve 38-543-150 was left in a closed or semi-closed position after the valve inspection on January 8, 2020, which resulted in low pressures and service interruption to customers.

#### **SoCalGas Corrective Actions:**

After the under-pressure incident and resulting investigation, SoCalGas suspended the OpQual for the employee who inspected the valve on January 8, 2020.

In addition, another employee and supervision conducted a visual inspection of the valve after the incident, and no issues were found. The valve indicators were clearly visible.

On February 12, 2020, SoCalGas held a huddle with Distribution field supervisors across the company to discuss some recent events involving valves, including this under-pressure event, so that others could learn from them. During the huddle, the Gas Standard on Valve Inspection and Maintenance for Distribution was reviewed, and important points from the standard were emphasized.

#### **SED’s Conclusion:**

SED has reviewed SoCalGas’ response and accepts the corrective actions that it has articulated and implemented. SED appreciates SoCalGas’ meeting with Distribution field supervisors discussing this under-pressure and other events involving valves; and reviewing Gas Standard on Valve Inspection and Maintenance for Distribution. SED has opted not to impose a fine at this time. However, SED will review the records of the corrective action during future inspections.

**2. General Order (G.O.) 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, §192.614(c)(5) states in part:**

(c) *“The damage prevention program required by paragraph (a) of this section must, at a minimum...*

*(5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.”*

On February 3, 2020, at approximately 1130 hours, Crown Engineering, (a third-party contractor) was performing boring operations to install communications line when the boring tool damaged a SoCalGas' 6-inch plastic gas main resulting in an unintentional release of natural gas into the atmosphere. There were no fatalities, injuries, fire, or service interruption reported as the result of this incident. SED investigation found that SoCalGas failed to locate and mark the 6-inch plastic gas main within the delineated area heading East crossing Jewetta Ave. North of Olive Dr. Bakersfield, thus in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, 192.614(c)(5).

**SoCalGas' Response:**

SoCalGas acknowledges that it did not locate and mark approximately 15 feet of its six-inch gas main within the delineated area of the excavation. SoCalGas's employee marked over one mile of mains and services within the large delineation area. After passing through the intersection to capture the main running north to south on Jewetta Ave., however, the employee forgot to return to the intersection to locate and mark the main crossing Jewetta Ave on Olive Dr.

**SoCalGas Corrective Actions:**

SoCalGas disqualified the employee's locate and mark operator qualification elements after the incident. He was re-evaluated and re-qualified before performing additional locate and mark activities. In addition, supervision held a counseling session with the employee to stress the importance of accurately locating and marking all gas facilities within a delineated area. This incident was shared with the district work group. In connection therewith, employees were reminded of the importance of following company policies to prevent excavation damage.

**SED's Conclusion:**

SED has reviewed SoCalGas' response and accepts the corrective actions that it has articulated and implemented. SED has opted not to impose a fine at this time. SED recognizes SoCalGas' efforts and measures taken to address the violation and prevent recurrence of such events. However, to enhance safety practices for temporary marking of the subsurface installations, SED recommends SoCalGas to follow California Underground Facilities Safe Excavation Board (CUFSEB) recommendation dated August 21, 2021 and have the employee and/or others responsible for the locate and mark program attend CUFSEB's remote educational course.