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June 15, 2021

Mr. Mahmoud (Steve) Intably, P.E.
Program and Project Supervisor, Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 W. Fourth Street, Suite 500
Los Angeles, CA 90013

Dear Mr. Intably:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) submitted the attached Notice of Probable Violations (NOPV) for Non-DOT reportable incident investigations completed in Q2 and Q3 of 2020.

Attached are Southern California Gas Company's (SoCalGas') written responses.

Please contact Troy A. Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Troy A. Bauer".

Troy A. Bauer
Pipeline Safety and Compliance Manager

CC: Gwen Marelli / SoCalGas
Terence Eng / SED-GSRB
M. Mohammad Ali / SED-GSRB
Kan-Wai Tong / SED-GSRB
Claudia Almengor / SED-GSRB

Attachment A
List of Incidents with Probable Violations

PUC ID	Date	Address	Utility	Third Party Entity	Code Violation(s)
G 20200113-2975	1/13/2020	2100 E Cross Ave, Tulare, Tulare County	SoCalGas	N/A	G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605 (a).

Investigative Finding

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 (full 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 (full 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.

PUC ID	Date	Address	Utility	Third Party Entity	Code Violation(s)
G20200203-2998	02/03/2020	11200 Olive Drive, Bakersfield, Kern County	SoCalGas	Crown Engineering	G.O. 112-F, Reference Title 49 CFR, Part 192, §192.614(c)(5).

Investigative Finding

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 resulted of this incident. SED investigation found that SoCalGas failed to locate and mark the 6-inch plastic gas main within the delignated 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.