

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 19, 2021

Non-DOT 2021-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 November 2, 2021, addressing three (3) violations identified by SED during its investigation of Non-DOT reportable incidents that occurred during September 29, 2020, through May 5, 2021.

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

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## **Non-DOT Reportable Incidents**

### **Probable Violations**

#### **1. General Order (G.O.)112-F, §122.2(b)(1), states:**

*“If the Operator is notified of the incident during its normal working hours, the report should be made as soon as practicable but no longer than 2 hours after the Operator is aware of the incident and its personnel are on the scene.”*

On September 29, 2020, at approximately 0900 hours, a third-party contractor, AAA Paving Co, damaged a SoCalGas 3-inch steel main with a grader, resulting in damage to the main, unintentional release of gas, and a service interruption. SED’s investigation found that the incident was caused by a third-party contractor failing to expose the 3-inch SoCalGas steel gas main with hand tools before using a grader. However, SoCalGas did not report this incident to the CPUC until 1413 hours when it had already received 10 odor reports from its customers by 1126 hours on September 29, 2020. Therefore, SED finds SoCalGas in violation of G.O. 112-F, §122.2 (b)(1) for reporting this incident longer than the 2-hour limit.

#### **SoCalGas’s Response & Actions:**

SoCalGas disagrees that a violation has occurred. This event never reached the threshold of 10 or more calls, meeting the required reporting trigger of G.O.112-F section 122.2. After the April 2021 Leadership meeting with SED, SoCalGas began rescinding area odor/public attention reports that, in the end, did not meet the criteria, as is the case with this event. Had this process been in place at the time of this incident, we would have requested to rescind this one, as further investigation has revealed we did not have 10 calls that were actually tied to the odor and damage. There were initially 3 calls indicating there was a broken gas line, and one later call related to the odor from the damage, for a total of 4. Other calls that were not close to or related to this event were originally counted, which led to a total of 10. Those were found to be associated with pilot outages and a sewage spill.

At times, SoCalGas, in an effort to be compliant with the regulations, will report incidents and events before the reporting requirements have been met. In this case, the event was reported prior to actually meeting the triggers of G.O.112-F section 122.2, *“Incidents which have either attracted public attention...”*. G.O.112-F defines public attention as *“any event that escalates to a level that initiates calls/complaints concerning a common safety concern being submitted to an Operator from 10 or more individuals...”*. Further, in an effort to remain compliant with the reporting requirements, SoCalGas now initiates the internal notifications when 8 calls are suspected of meeting the criteria. This practice will alert those with the regulatory reporting responsibility of a potential reportable event before the compliance requirements are met. This is an effort to allow initiation of the reporting to remain compliant. If an event is reported, and later deemed to have not met required reporting triggers, it will be rescinded.

#### **SED’s Conclusion:**

SED has reviewed SoCalGas’s response. During investigation, SED observed that, at the time of the incident, SoCalGas believed the 10 calls had to be counted towards the reporting requirements.

However, based on G.O. 112-F, section 122.2 (a) (2), the incident had to be reported in a timely manner. The section does not allow the operator to wait and confirm if those calls have to do with their facilities. SoCalGas's report was made late to the CPUC based on the G.O. 112-F threshold and the violation remains. However, SED accepts the explanation and has opted not to impose a fine at this time.

**2. 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. For transmission lines, the manual must also include procedures for handling abnormal operations.....”*

**2.1 SoCalGas's Gas Standard 184.0200, Underground Service Alert and Temporary Marking, §4.6.9.2 states:**

*“If locator signal, maps, or printed records cannot verify Company owned subsurface installation locations, advise Distribution Regions or Transmission District Management. Distribution Regions or Transmission Districts must take additional actions, such as using the Jameson Lines Tracer tool, or potholing the subsurface installation to find its exact location.”*

**2.2 SoCalGas's Gas Standard 184.0200, Underground Service Alert and Temporary Marking, §4.8.1 states:**

*“The following steps must be followed when an excavator cannot be reached for resolution to complete a USA ticket:*

- *Before the due date and time of the ticket attempt to contact the excavator.*
  - *If the ticket cannot be marked, then document attempt to contact excavator and why the ticket was not marked and select the applicable EPR that best matches the issue, see the EPR Code in Section 4.10.”*

**3. G.O. 112-F, Reference Title 49 CFR, Part 192, §192.614(c)(5) states:**

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

On May 5, 2021, at approximately 1110 hours, SoCalGas became aware that MGE Underground (MGE), a third-party contractor's backhoe struck a SoCalGas's ½-inch PE lateral tee stub at 1171 Village Dr., in Santa Maria, Santa Barbara County. The incident caused an unintended release of gas into the atmosphere. There were no injuries, fatalities, or property damage reported as the result of this incident. The incident was reported to the CPUC when SoCalGas became aware of media coverage. SED found that:

- MGE did have a valid USA ticket at the time of the incident.

- SoCalGas's Line Locator failed to locate and field mark SoCalGas's ½-inch PE lateral tee stub in the area of excavation activity, thus in violation of §192.604(c)(5).
- SoCalGas Line Locator failed to contact SoCalGas District Management to inform them that he could not verify SoCalGas's ½-inch PE lateral tee stub location and additional actions must be taken by the Distribution District to find the exact location. Therefore, SoCalGas is in violation of §192.605(a) for not following its Gas Standard 184.0200, §4.6.9.2.

SoCalGas's Line Locator failed to document his attempt to contact MGE to inform them why the DigAlert B211180143 ticket was not marked complete and did not select the applicable EPR Codes that best match the issues. Therefore, SoCalGas is in violation of §192.605(a) for not following its Gas Standard 184.0200, §4.8.1 and §192.604(c)(5) for not locating and field marking SoCalGas's 1/2-inch PE lateral tee stub.

### **SoCalGas's Response & Actions:**

SoCalGas acknowledges that it failed to locate and mark the half-inch plastic stub at 1171 Village Dr., Santa Maria. The employee working on that USA ticket was not able to find the stub with his locator. The employee then failed to notify management that the stub could not be located, and he did not properly document his actions or issues on the USA ticket.

SoCalGas suspended this employee's locate and mark operator qualification elements, and he was subsequently re-trained and re-qualified. The employee was counselled on the importance of accurately locating and marking facilities and re-reviewed the Locate and Mark Gas Standard 184.0200. The incident was reviewed with the work group, and employees were reminded of the importance of accurately locating and marking facilities and following procedure.

The repair on 05/05/2021 abandoned the stub, and GIS has been updated to reflect that change. In addition, the abandoned stub information has been updated in Service History.

### **SED's Conclusion:**

SED has reviewed SoCalGas's response and accepts the corrective actions that it has articulated and implemented in suspending, re-training and requalifying the employee failed to locate and mark plastic stub. SED has opted not to impose a fine at this time. SED recognizes SoCalGas's efforts and measures taken to address the violation and prevent recurrence of such events. Therefore, SED accepts SoCalGas's explanation and has opted not to impose a fine at this time.