PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



October 7, 2021

Non-DOT completed in Q3 of 2021

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

**SUBJECT:** Notice of Non-DOT Gas Incident Violations for Southern California Gas Company (SoCalGas)

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) submits the following Notice of Probable Violations (NOPV) for Non-DOT reportable incident investigations completed in Q3 of 2021. This letter serves as notification to you that as a result of our investigations, SED found SoCalGas in violation of the following:

#### 1. <u>General Order (GO) 112-F, Reference Title 49 Code of Federal Regulations</u> (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....."

# 1.1 SoCalGas' 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."

## 1.2 SoCalGas' 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."

### 2. <u>GO 112-F, Reference Title 49 CFR, Part 192, §192.614(c)(5) states:</u>

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

#### 3. <u>GO 112-F, §122.2(b)(1), states:</u>

"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."

The summary of the identified violations is listed in Attachment A of this letter. Please provide a written response within 30 days of receipt of this letter indicating the measures taken by SoCalGas to address the violations noted in the "Attachment A" of this letter.

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

Sincerely,

Normail Stoll

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

Attachment A

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

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

M. Mohammad Ali, Ph.D., P.E. Senior Utilities Engineer (Supervisor) Gas Safety and Reliability Branch Safety and Enforcement Division

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

Claudia Almengor Associate Governmental Program Analyst Gas Safety and Reliability Branch Safety and Enforcement Division

### <u>Attachment A</u> List of Incidents with Probable Violations

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Finding	Code Violation(s)
G20200929-3217	9/29/2020	128 S. Camino Los Banos, San Jacinto, Riverside County	SoCalGas	v	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 GO 112-F, §122.2 (b)(1) for reporting this incident longer than the 2-hour limit.	GO 112-F, §122.2(b)(1).

G20210505-3216	5/5/2021	1171 Village Dr.,	SoCalGas	MGE	On May 5, 2021, at approximately 1110 hours, SoCalGas	GO 112-F,
G20210505-3216	5/5/2021	1171 Village Dr., Santa Maria, Santa Barbara County	SoCalGas	MGE Underground	<ul> <li>became aware that MGE Underground (MGE), a third-party contractor's backhoe struck a SoCalGas' <sup>1</sup>/<sub>2</sub>-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:</li> <li>MGE did have a valid USA ticket at the time of the incident.</li> <li>SoCalGas' Line Locator failed to locate and field mark SoCalGas <sup>1</sup>/<sub>2</sub>-inch PE lateral tee stub in the area of excavation activity, thus in violation of §192.604(c)(5).</li> <li>SoCalGas' <sup>1</sup>/<sub>2</sub>-inch PE lateral tee stub location and additional actions must be taken by the Distribution</li> </ul>	GO 112-F, Reference Title 49 CFR, Part 192, §192.604(c)(5) and §192.605(a)
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					• SoCalGas 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.	