

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 8, 2022

Non-DOT completed in Q2-2022

Rodger Schwecke,
Senior Vice President and Chief Infrastructure Officer
Southern California Gas Company
555 West 5th 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 August 5, 2022, addressing two (2) probable violations identified by SED during its investigation of Non-DOT reportable incidents that occurred on March 25, 2022 and February 8, 2022.

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 this investigation. If you have any questions, please contact Mohammad Ali, Senior Utilities Engineer (Supervisor), at (916) 928-2109 or by email at 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

cc: See next page

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Non-DOT Reportable Incidents occurred on March 25, and February 8, 2022
Identified Probable Violations

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

“(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 March 25, 2022, at about 1515 hours, a third-party contractor, Media Communications Company struck SoCalGas’ 2-inch plastic gas main and a ½-inch plastic service line with a wheel trencher while installing underground communication lines. This resulted in release of natural gas into the atmosphere, service interruption, and damage to the gas lines. There were no injuries, fatalities, or third-party damage reported as the result of this incident. This incident was reported to the CPUC due to release of natural gas and major media coverage. SED’s investigation found that the incident was caused by SoCalGas failing to locate and field mark its subsurface installations (2-inch plastic gas main and ½-inch plastic gas service line) within the area of excavation activity before the start of excavation. Therefore, SED found SoCalGas in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, § 192.614(c)(5).

SoCalGas’s Response & Corrective Actions:

Response:

SoCalGas puts public and employee safety as its top priority and is dedicated to learning from any incident that may occur as a result of its work activities. SoCalGas acknowledges that the incident on March 25, 2022, at 2020 E. Joyce Drive in Palm Springs, CA was the result of Company records being insufficiently accurate. We continually strive to improve our process. Listed below are our findings and corrective actions for this incident.

Corrective Actions:

SoCalGas investigated the incident to determine the cause, who was responsible, what actions to take next, and what lessons could be learned.

The locate and mark employee had difficulty getting a proper signal at the tie-in location and used measurements to locate the tie-in and service.

The excavator, who was using a boring machine that was parked at 2040 E. Joyce Way, hit the small main cross over at the tie-in location along with the proximate service that was located at 2020 E. Joyce Way. Post incident field validation revealed that the Company records denoting the service and tie-over location were inaccurate.

Updates to service history and mapping records were initiated and are currently underway through a mapping update request (MUR 197804).

The locate and mark team has discussed this incident and performed a refresher with all locators on utilizing all available resources when difficult-to-locate subsurface installations

SED's Conclusion:

SED has reviewed SoCalGas's response and accepts the proposed corrective actions. SED acknowledges that the proposed corrective actions will promote and foster strong safety culture, and sufficiently address the probable violations. SED recommends no fines or penalty be imposed at this time.

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

“(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 8, 2022, at approximately 1655 hours, a third-party contractor, Nobest Inc. struck a SoCalGas 2-inch steel gas main with a backhoe. This incident resulted in a release of natural gas, damage to the gas main, and a service interruption. SED's investigation found that the incident was caused by SoCalGas failing to locate and field mark its subsurface installation (2-inch steel gas main) within the area of excavation activity before the start of excavation. Therefore, SED found SoCalGas in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.614(c)(5).

SoCalGas's Response & Corrective Actions:

Response:

SoCalGas puts public and employee safety as its top priority and is dedicated to learning from any incident that may occur as a result of its work activities. SoCalGas acknowledges that the incident on February 8, 2022, at 2213 Florida Street, Huntington Beach, CA was the result of SoCalGas' locate and mark personnel not following Gas Standard GS 184.0200 – Underground Service Alert and Temporary Markings for temporary markings of Company subsurface installations.

Corrective Actions:

SoCalGas investigated the incident to determine the cause, who was responsible, what additional actions may be needed and any lessons that could be learned.

Through the investigation, it was revealed that the locate and mark employee did not follow Company procedure and failed to mark Company facilities. This occurred based upon the field locator's understanding of the proposed depth of excavation based upon conversations with the excavator.

The locator should have followed Company procedure and marked the Company facilities instead of determining there was no conflict.

The local management team provided training on GS 184.0200 – Underground Service Alert and Temporary Markings to the employee and other locate and mark personnel at the base.

To address the potential for a similar situation occurring across the Company, Info Bulletin 2222, No Depth Exemptions when Completing USA Tickets was published on 3/15/22. The bulletin clarifies that locator and mark personnel must not complete tickets as no conflict based upon depth of excavation. Training based upon the Info Bulletin was completed for qualified field employees on IBSC0520 on 4/1/22.

SED's Conclusion:

SED has reviewed SoCalGas's response and accepts the proposed corrective actions. SED acknowledges that the proposed corrective actions will promote and foster strong safety culture, and sufficiently address the probable violations. SED recommends no fines or penalty be imposed at this time.