

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



March 22, 2023

Non-DOT completed in Q2-2022

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

SUBJECT: Notice of Non-DOT Gas Incident Violation for San Diego Gas & Electric Company (SDG&E)

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submits the following Notice of Probable Violations (NOPV) for Non-DOT reportable incident that occurred on November 29, 2021, at 10373 Azuzaga St., in San Diego, CA. This incident resulted in service interruption to 128 customers and in property damage to SDG&E including gas release was \$15,925.

1. **General Order (GO)112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, Section 192.605(a) states:**

"Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."

SDG&E Gas Standard G8123 – Underground Service Alert and Temporary Marking states, in part:

"4.6.9. Ensure and verify the location of all Company subsurface installations within the delineated area using:

-Use an approved locating instrument.

-Use the most up-to-date copies of Company records, such as GIS maps, as-builts and drawings as additional resource information.

4.6.9.2. If locator signal, maps, or records cannot verify Company owned subsurface installation locations, advise Distribution Regions or Transmission Management. Distribution Regions or Transmission Management must take additional actions [...] to find its exact location."

SED investigation found that the Gas Distribution Locator failed to follow SDG&E's Gas Standard G8123, Section 4.6.9.2 to advise the distribution regions to take additional actions to find the exact location of the 2-inch plastic gas main. Therefore, SED finds SDG&E in violation of GO 112-F, Reference, Title 49 CFR, Part 192, Section 192.605(a).

SDG&E Gas Standard 7257 – Tracer Wire Installation for Polyethylene, requires two and three wire connections to have its stripped wire ends be crimped together with an approved Sta-Kon connector and the connections be sealed with Aquaseal and tape (Section 7257.1 F).

SED's investigation found that the tracer wire installer failed to follow SDG&E Gas Standard 7257, Section 7257.1F resulting in the tracer wires becoming disbonded and impacting SDG&E's efforts to locate the 2-inch plastic gas main. Therefore, SED finds SDG&E in violation of GO 112-F, Reference, Title 49 CFR, Part 192, Section 192.605(a).

2. GO 112-F, Reference Title 49 CFR, Part 192, Section 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.”

SDG&E failed to provide field markings of the involved SDG&E 2-inch plastic gas main although the substructure lay within the area delineated for excavation. Therefore, SED finds SDG&E in violation of 112-F, Reference Title 49 CFR, Part 192, Section 192.614(c)(5).

Please provide a written response within 30 days of receipt of this letter indicating the measures taken by SDG&E to address the violations noted in this letter.

Thank you for your cooperation in this investigation. 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,



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

cc: See next page

Alex Hughes, Manager
Pipeline Safety and Compliance
Southern California Gas Company
555 West 5th Street
Los Angeles, CA 90013

Neena Master, Emergency Management Director
Emergency Management and Preparedness
Southern California Gas Company
555 West 5th 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

Gordon Huang
Utilities Engineer
Gas Safety and Reliability Branch
Safety and Enforcement Division

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