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August 26, 2025

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 St, Suite 500
Los Angeles, CA 90013

Dear Mr. Intably:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) reviewed the Southern California Gas Company (SoCalGas) response-letter dated July 3, 2025, addressing two (2) probable violations identified by SED during its investigation of DOT reportable incident (DOT) Initial #1395201) that occurred on March 29, 2024, at ██████████ 10th Street E., Palmdale, in Los Angeles County, CA. In light of the new information provided by SoCalGas, SED updated its initial findings.

Below is SoCalGas' written response.

Please contact ██████████ at (213) 671-1344 if you have any questions or need additional information.

Sincerely,

██████████
██████████

Pipeline Safety and Risk Mitigation Manager

CC:

██████████, SoCalGas
Terence Eng, SED/GSRB
Randy Holter, SED/GSRB
Claudia Almengor, GSRB

2024 SoCalGas DOT#1395201 Incident Investigation Response

Violation(s):

1. **General Order (G.O.) 112-F, Rule 101.2, which incorporates Title 49 of the Code of Federal Regulations (49 CFR), Parts 191, 192, 193, and 199, and the following regulations:**

Title 49 CFR 192, § 192.605(b)(3), which states, in part:

“Making construction records, maps, and operating history available to appropriate operating personnel.”

SoCalGas failed to make current construction records, maps, and operating history of the 1-inch stub connected to the 10-inch SL32-60ST pipe available to appropriate operating personnel. Therefore, SED finds SoCalGas in violation of G.O.112-F, Rule 101.2, and Title 49 CFR, Part 192, § 192.605(b)(3).

SoCalGas Response & Actions:

SoCalGas disagrees that there was a violation of G.O.112-F, Rule 101.2, and Title 49 CFR, Part 192, § 192.605(b)(3). At the time of the incident, the 1-inch stub in question was accurately represented as an active facility within the GIS system. A copy of the GIS map indicating the stub’s presence was provided to SED on April 29, 2024, in the attachment *Preset Data Request - [REDACTED] 10th St E Palmdale LA.*

SED’s conclusion:

In light of the new information provided by SoCalGas, SED agrees that SoCalGas provided the GIS Gas Asset Map record of the subsurface installations affected in this incident. The SoCalGas GIS Gas Asset Map record shows the 10-inch SL32-60ST pipe laying parallel in the 10th St E. roadway and the 1-inch stub Service Tee connected to SL32-60ST pipe, shown at approximately [REDACTED] 10th St E. Therefore, there is no probable violation on this item. See SED NOPV 3.

2. **G.O. 112-F, Reference Title 49 CFR, Part 192, § 192.727(b) states, in part:**

“Each pipeline abandoned in place must be disconnected from all sources and supplies of gas; purged of gas”

SoCalGas misidentified the 1-inch steel stub as “abandoned”. The evidence shows that the 1-inch stub carried source gas because the stub was not physically separated from its source of gas and was still physically connected to its source of gas: the 10-inch SL32-60ST pipe. SED found that SoCalGas did not include and identify the active gas carrying 1-inch stub on its GIS mapping system. Therefore, SED found SoCalGas in violation of G.O.112-F, Rule 101.2, and Title 49 CFR, Part 192, § 192.727(b).

SoCalGas Response & Actions:

SoCalGas disagrees that there was a violation of G.O.112-F, Rule 101.2, and Title 49 CFR, Part 192, § 192.727(b). At the time of the incident, the 1-inch stub in question was accurately represented as an active facility within the GIS system. A copy of the GIS map indicating the stub's presence was provided to SED on April 29, 2024, in the attachment *Preset Data Request - [REDACTED] 10th St E Palmdale LA*.

SED's Conclusion:

In light of the new information provided by SoCalGas, SED agrees that at the time of the incident, the 1-inch steel stub in question was accurately represented as an active facility "ST", within the SoCalGas GIS system. During the course of this investigation, SoCalGas referred to the 1-inch steel stub as "abandoned". Additional details came to light that SoCalGas records did not use this term to identify the 1-inch stub. The term "abandoned" was used to reference other subsurface abandoned facilities in the course of investigation interviews and record responses. Therefore, there is no probable violation on this item. See SED NOPV 3.

During the course of this investigation, new information has emerged, SED is updating its initial findings and providing the following additional details:

3. California Government Code (CGC) §4216(a) states, in part:

"Active subsurface installation" means a subsurface installation currently in use or currently carrying service."

CGC §4216(a)(1)(A)(ii) states, in part:

"To the extent and degree of accuracy that the information is available, provide information to an excavator where the operator's active or inactive subsurface installations are located."

G.O. 112-F, Reference Title 49 CFR, Part 192, § 192.727(c)(5) states, in part:

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

According to SoCalGas emails, (received by SED on 7/30/25 and 7/25/25) and witness interviews (conducted by SED on 4/19/2025), SoCalGas failed to provide markings for the 1-inch steel stub in the area of excavation activity before the excavator's activity began. Therefore, SED finds SoCalGas in violation of G.O.112-F, Reference Title 49 CFR, Part 192, § 192.614(c)(5). In addition, SED finds SoCalGas in violation of CGC §4216(a)(1)(A)(ii) for failure to provide information to the excavator on the location of the 1-inch steel stub.

SoCalGas Response & Actions:

SoCalGas respectfully disagrees with SED's finding that it violated G.O.112-F, Reference Title 49 CFR, Part 192, § 192.614(c)(5), and California Government Code § 4216.3(a)(1)(A)(ii) in connection with the marking of a 1-inch steel stub prior to excavation activity.

SoCalGas maintains that it complied with the requirements of 49 CFR § 192.614(c)(5). The main was accurately marked prior to excavation. According to SoCalGas Standard GS 184.0080 – Abandonment of Gas Services and Repairs/Abandonments of Gas Light Tap Assemblies, section 4.1.3.5 states:

“Note: All fittings and stubs will be considered part of the main after service is abandoned.”

Per the gas standard, the 1-inch steel service tee in question is considered part of the main and was therefore included in the markings provided. While SoCalGas recognizes the importance of thorough identification, it is not practical to mark every individual service tee connected to a main, where the gas service has been abandoned. Similarly, water utilities and other operators refrain from marking such protrusions. Therefore, it is important to note that California law 4216.4(a)(2) requires the excavator to expose the facility with hand tools before using any power operated equipment. This ensures anything that may be protruding from the main within the tolerance zone is discovered and exposed to prevent damage. This incident could have been prevented if the excavator followed the requirements of hand exposing the main before using power equipment.

California Government Code § 4216.3(a)(1)(A) requires operators to perform one of three actions, outlined in subsections (i) through (iii), prior to the legal excavation start date and time. SoCalGas fulfilled subsection (i) by accurately marking the main within the area delineated for excavation. As the remaining service tee is considered part of the main, its location was inherently included in the markings. Accordingly, subsection (ii) was not applicable, and SoCalGas was not required to provide separate information on said tee.

SoCalGas asserts that it acted in accordance with both federal and state regulations. However, SoCalGas remains committed to continuous improvement and, as part of our safety assurance measures, SoCalGas will seek opportunities to educate third-party contractors about potential fittings attached to gas mains that may be encountered during excavation activities.