

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 26, 2025

G20250320-3827-DOT

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

Dear Mr. Navin:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submits the following Notice of Probable Violation (NOPV) letter as part of its investigation of the Department of Transportation (DOT) reportable incident (DOT Initial #1426420) that occurred on March 20, 2025, at the intersection of W Esplanade Ave and S State St, San Jacinto, in Riverside County, CA. A subcontractor hired by SoCalGas was operating a backhoe during excavation when it struck a 1-inch diameter, 3-inch-long nipple welded to the top of an 8-inch diameter High Pressure Distribution Gas Main, SL41-17 resulting in the release of natural gas into the atmosphere. The cost of the property damage, emergency response, and release of natural gas was approximately \$335,432. This letter serves as a notification that as a result of SED's investigation, SoCalGas is in probable violation of the following regulations:

1. California Government Code (CGC) 4216.4(a)(1):

"Except as provided in paragraph (2), if an excavation is within the tolerance zone of a subsurface installation, the excavator shall determine the exact location of the subsurface installations in conflict with the excavation using hand tools before using any power-driven excavation or boring equipment within the tolerance zone of the subsurface installations."

SoCalGas failed to expose SL41-17 with hand tools before using power-drive excavation tools. SL41-17 was within the tolerance zone of 24 inches on each side of the markings. While SoCalGas did pothole the Medium Pressure Gas Pipeline (MPGP), they did not pothole SL41-17 at the same location. SoCalGas allowed the use of a backhoe within the tolerance zone, leading to contact damage with the 1-inch diameter, 3-inch-long nipple welded to the top of SL41-17. Therefore, SoCalGas is in probable violation of CGC § 4216.4(a)(1) for failing to determine the exact location of the subsurface installation in conflict with the excavation using hand tools before using any power-driven excavation or boring equipment within the tolerance zone of the subsurface installations.

2. Title 49 Code of Federal Regulations (CFR) Part 192.605(b)(3):

"Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities [...] [The manual must include procedures for]...[m]aking construction records, maps, and operating history available to appropriate operating personnel."

SoCalGas's relevant manual, SoCalGas Gas Standard (GS) 192.0010, Preparation of Construction Sketches, Section 4.28 states: "For construction purposes, list minor fittings such as abandoned nipples, when it is not obvious that they are required." However, SoCalGas stated in its response that, "The damaged nipple is a minor fitting typically used in conjunction with pressure control fittings. In this case the AB nipple was installed near an 8"x6" oversized pressure control fitting. Because the oversized 8"x6" pressure control fitting was near the location of the damage, it is reasonable and obvious to expect a minor fitting, such as a nipple, to be present with this installation as well."

However, it is not reasonable and obvious that the long nipple was required to be on the SL41-17, so it should have been listed on the construction sketch. None of the seven people who were working at the site at the time of the incident (five Teichert employees, one SoCalGas Stand-by person, and one Sharps Backhoe employee) anticipated that a 1-inch diameter, 3-inch-long nipple was welded to the top of SL41-17. Moreover, the SoCalGas GS does not state that it is reasonable to expect long nipples next to a pressure control fitting. SoCalGas did not provide any supporting documentation that its employees or contractors should be aware of long nipples co-located with pressure control fittings. For these reasons, SED finds that it was not obvious that the long nipple was required in that location of SL4-71, and the long nipple should have been included on the construction map. Therefore, SED finds SoCalGas in probable violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR) Part 192.605(b)(3) for failure to make accurate construction records, maps, and operating history available to appropriate operating personnel, including the existence of the nipple on its construction map.

3. Title 49 Code of Federal Regulations (CFR) Part 192.605(a) states:

"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."

SoCalGas did not follow its procedures as listed below.

- a. SoCalGas GS 184.09, Section 4.3.1.5 states: "Stand-by and provide guidance while potholing is taking place. Hand digging across the entire tolerance zone down to the depth of the planned excavation plus an additional 18-inches of depth is permitted in lieu of finding the exact location of the high priority subsurface installation."

The Stand-by did not provide guidance to expose SL41-17 by hand digging. SL41-17 was at the same depth and 12 inches away from the MGP, which is within 24 inches of the tolerance zone. Therefore, SED finds SoCalGas in probable violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR) Part 192.605(a) for failure to provide guidance to hand dig, as required by its GS.

- b. SoCalGas GS 184.09, Section 4.3.1.14 states:

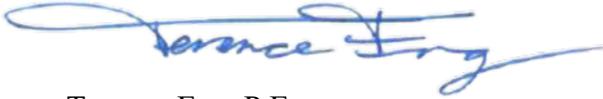
"Report indications and instances where Company subsurface installations are or may become endangered to the excavator's supervisor and the project inspector of the agency responsible for the work."

The Stand-by failed to identify the danger/potential threat of using heavy equipment too close to SoCalGas' underground facilities and to communicate these threats with Teichert and Sharps Backhoe's management. Therefore, SED finds SoCalGas in probable violation of G.O.

112-F, Reference Title 49 Code of Federal Regulations (CFR) Part 192.605(a) for failure to report/communicate these indications/instances with the excavator's supervisor.

Within 30 days of the date of this letter, please provide your response to the probable violations identified in this letter. If you have any questions, please contact Gordon Kuo (Senior Utilities Engineer – Specialist), by phone at (213) 618-5263 or by email at gk2@cpuc.ca.gov.

Sincerely,



Terence Eng, P.E.
Program Manager
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cc:

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