

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 22, 2025,

G20231216-3638-DOT Initial #1395201

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

Email: nnavin@socalgas.com

Dear Mr. Navin:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) reviewed the Southern California Gas Company's (SoCalGas) response-letter dated August 26, 2025, presenting two (2) resolved and addressing one (1) probable violation identified by SED during its investigation of DOT reportable incident (DOT) Initial #1395201 that occurred on March 29, 2024, near [REDACTED] 10th Street E, Palmdale, in Los Angeles County, CA.

On October 10, 2025, SED clarified its findings by presenting one (1) resolved and addressing two (2) probable violations and providing additional details below. On December 1, 2025, SoCalGas and the CPUC SED held a virtual meeting and discussed the potential findings. SoCalGas' December 08, 2025, responses are written below.

SED's investigation found that an active SoCalGas subsurface 1-inch steel stub was struck by a third-party contractor and was not located by SoCalGas in the field because the SoCalGas Geographic Information System (GIS) plans did not show it on the GIS map.

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 letter and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

If you have any questions, please contact Randy Holter (Senior Utilities Engineer – Specialist), by phone at (818) 821-4309 or by email at rh3@cpuc.ca.gov.

Sincerely,

Mahmoud Intably, PE
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

cc: See next page

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DOT Incident Investigation #1395201
03/29/2024

Notice of Probable Violations:

- 1. General Order (G.O.) 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, §192.605(b)(3) states, in part (June 4, 2025):**

“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 steel 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 (July 1, 2025):

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 steel 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*(August 1, 2025):

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 near [REDACTED] 10th St E. Therefore, there is no probable violation on this item*.

***SED’s Addendum to Prior Conclusion, Clarification and Response (October 10, 2025):**

The SoCalGas GIS Gas Asset Map record shows “ST”, Service Tee connected to SL32-60ST pipe, shown near [REDACTED] 10th St E, Palmdale. However, the SoCalGas GIS map did not show another active 1-inch steel stub that was struck by the third-party contractor near [REDACTED] 10th St E, Palmdale. Therefore, SED is withdrawing its prior conclusion to clarify that the initial violation remains, and corrective action is required. See Item 3 and Appendixes.

SoCalGas Response (December 8, 2025):

See consolidated SoCalGas Response to item #3 below.

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 violation if service Tees, stubs, fittings or components that are protruding as much as 12 inches beyond visible piping are properly implemented into SoCalGas construction records, maps, and operating history. To address this item, SoCalGas has provided its consolidated response in item #3 below and SED will periodically monitor plans and actions of SoCalGas' GIS Mapping Policy to develop the process for mapping abandonment fittings carrying gas and attached to mainline pipes. SED recommends no fine or penalty be imposed at this time. However, SED may review the implementation of the stated corrective actions during future inspections.

2. G.O. 112-F, Reference Title 49 CFR, Part 192, § 192.727(b) states, in part (June 4, 2025):

“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 (July 1, 2025):

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 (August 1, 2025):

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.

SED's Conclusion:

SED has reviewed SoCalGas's response and found it acceptable. SED recommends no fine or penalty be imposed at this time.

During the course of this investigation, new information emerged, SED updated its initial findings and provided the following additional details:

3. California Government Code (CGC) §4216(a) states, in part (August 1, 2025):

“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 (August 26, 2025):

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.

SED's Conclusion (October 10, 2025):

SED finds that the incident investigation records show that the third-party excavator used hand tools before using any power-driven excavation or boring equipment within the tolerance zone (ref. CGC §4216.4.(a)(1); see Appendix 1). The third-party excavator did locate a “ST” service stub (noted on the SoCalGas GIS plans; Appendix 3) ten feet north of the HPDSM pipe locator potholes and located abandoned lateral steel service lines, separated approximately 10 feet across the street near [REDACTED] 10th St E, Palmdale. Because of this, the third-party excavator felt its crews were clear to carefully use a backhoe on March 29, 2024, with a spotter from his crew. Once the 10-inch HPDSM pipe was exposed, third-party excavator switched back to the backhoe to excavate.

The SoCalGas Stand-by stated that the 1-inch steel stub on the 10-inch HPDSM pipe that was struck was not located and explained to the third-party excavator because the SoCalGas GIS plans do not show it on the map (see Appendix 3). The active 1-inch steel stub was struck by the third-party excavator near [REDACTED] 10th St E, Palmdale. However, the SoCalGas GIS map shows an “ST”, service stub near 37516 10th St E, Palmdale.

SoCalGas Data Response Emails (Appendix 2) show that SoCalGas was not able to locate “any service history regarding abandonment”. SED maintains that there was a historical SoCalGas abandonment event, likely at the time the new distribution line was installed in 10th St E, Palmdale, and parallel to the 10-inch HPDSM pipe. The 1-inch steel stub remained as an active subsurface installation and should have been incorporated into the SoCalGas GIS plans at the same time the [REDACTED] 10th St E, Palmdale “ST” service stub was noted on the GIS plans. The unnoted service stub near [REDACTED] 10th St E, Palmdale is the 1-inch steel stub that was struck by the third-party contractor because it was not located and marked by the SoCalGas stand-by, because it was not made available on the SoCalGas personnel on the GIS map.

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), and GIS maps, 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 concludes that the initial violation remains, and corrective action is required.

SoCalGas Response (December 8, 2025):

- Indeed, California Government Code §4216.4 mandates hand excavation within the "tolerance zone", defined in California Government Code §4216(u) as 24 inches on either side of the buried facility, to avoid damage. It is widely recognized in the industry that this required hand excavation is necessary to provide a margin of error for the actual location of the facility and to account for any fittings, service tees, stubs, etc. that may be attached thereto. Here, SoCalGas accurately identified and marked the existence of the 10-inch HPDSM pipe. The contractor struck the 1” tee with a backhoe while excavating in the

tolerance zone for that marking. In fact, the 1” tee was on the top side of that 10-inch HPDSM pipe. Had the contractor used the reasonable care to avoid damaging subsurface installations required under California Government Code §4216.4(a)(1), it should have exposed the entire surface of the 10-inch HPDSM pipe by hand before using power equipment. Doing so would have revealed the foreseeable protruding stub and avoided the incident. There is no applicable exception allowing the contractor to do otherwise. Further, as previously noted, under California Government Code §4216.3(a)(1)(A) i-iii, SoCalGas was required to take one of three actions to locate and mark its subsurface installations, one of which, item (i), is to locate and field mark, within the area delineated for excavation, its subsurface facilities. It is not disputed that SoCalGas did that. The other two actions, items ii and iii, were alternative options, not additional requirements, and thus have no applicability.

- Current locating technologies cannot detect small protrusions from the main, so relying on the markings based on them to provide a complete picture of all subsurface facilities creates a false sense of comfort and safety. This limitation underscores the importance of §4216.4’s requirement to fully expose the facility by hand before proceeding with mechanical excavation, thereby mitigating risk. As with all underground infrastructure, third-party excavators should not assume that pipelines and conduits are perfectly cylindrical or free of protrusions.
- SoCalGas maintains that all applicable regulations (49 CFR 192, GO112F, CA GC 4216, and Common Ground Alliance (CGA) Best Practices), on our part, were followed.

Commitment to Continuous Improvement in Damage Prevention and Excavation Safety:

- The SoCalGas Damage Prevention team is developing an automated electronic response system through DigAlert®. When a potential conflict is identified within a work area, third-party excavators will receive a message such as: “Per CA Government Code §4216, use ~~ONLY~~* hand tools to fully expose the pipe before powered excavation within the tolerance zone. Gas pipelines may include short, unmarked fittings or components beyond visible piping.” This message reinforces the legal requirement to hand-excavate within the tolerance zone and highlights the possibility of unmarked pipeline features that could pose a risk during mechanical excavation. [*removed by SoCalGas in 12/17/2025 email to SED]
- Following the discussion with the CPUC Safety and Enforcement Division (SED) on December 1, 2025, SoCalGas will:
 - Review the GIS Mapping Policy to clarify the process for mapping abandonment fittings going forward.
 - Review the Employee Stand-by policy for opportunities to identify areas for improvement in risk mitigation.

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 violation. SED will periodically monitor plans and actions of SoCalGas' Commitment to Continuous Improvement in Damage Prevention and Excavation Safety Policy to develop an automated electronic response system through DigAlert® when a potential pipe protrusion conflict is identified within a work area. SED recommends no fine or penalty be imposed at this time. However, SED may review the implementation of the stated corrective actions during future inspections.

APPENDIXES

Appendix 1 – Investigation Interviews

On April 19, 2024, 0700 hours, SED interviewed SoCalGas' stand-by employee, Stand-by-29, over the telephone.

According to SoCalGas' Stand-by-29 employee, he was guiding the third-party contractor, Patriot, per USA ticket A240650046G27T. Patriot was excavating a 25-inch water main pipeline trench parallel to the SoCalGas 10-inch HPDSM pipe in the street. The Stand-by-29 confirmed the appropriate utility location markings were accurately completed and confirmed them before Patriot excavation crews began to excavate the third-party trench.

Stand-by-29 stated Patriot's crews used hand tools to expose SoCalGas' 10-inch HPDSM pipe when the backhoe excavator bucket approached within 24-inches of SoCalGas' 10-inch HPDSM pipe. Stand-by-29 stated Patriot crews switched to hand tools and located the pipe by excavating a bench in the soil and exposed the 10-inch HPDSM pipe. Once the 10-inch HPDSM pipe was exposed, Patriot switched back to the backhoe to excavate.

Stand-by-29 stated that he was aware of an abandoned gas service line because the Patriot operators had found them when they were excavating across the street. The SoCalGas map shows a separate and parallel SoCalGas main line, approximately 20 feet away which provides service connections to the abandoned 10-inch HPDSM pipe services.

Stand-by-29 stated that the 1-inch steel stub on the 10-inch HPDSM pipe that was struck was not located because the SoCalGas GIS plans do not show it on the map.

On June 29, 2024, 1440 hours, SED interviewed by telephone, the third-party contractor, Patriot, who struck the SoCalGas 1-inch steel stub with the backhoe excavator bucket:

The Patriot superintendent had been in communication with SoCalGas Stand-by-29 prior to the incident and on March 26, 2024. In the interview, Patriot's superintendent stated that he had a discussion with SoCalGas' Stand-by-29 on March 28, 2024, regarding the abandoned lateral and the possible existence of a matching 1-inch steel stub on the 10-inch HPDSM pipe. Patriot's superintendent stated he attempted to locate the lateral 1-inch steel stub "ST" on the 10-inch HPDSM pipe but was not able to locate it after several potholes and there was no note of it on the SoCalGas plans. Patriot did locate another service stub approximately ten feet north of the abandoned lateral, steel service lines, separated approximately 10 feet across the street. Because of this, Patriot felt clear to carefully using a backhoe on March 29, 2024, with a spotter from his crew.

Patriot stated they were operating in the tolerance zone without guidance from the SoCalGas stand-by because they thought they were clear of damage due to a pothole locating the 10-inch HPDSM pipe less than 10-feet away and locating a different service stub 10 feet away, north, near [REDACTED] 10th St E, Palmdale. Patriot crews were not aware of the abandoned 1-inch steel stub location near [REDACTED] 10th St E, Palmdale when they used the hand tools nor when they were using the backhoe to excavate.

Appendix 2 – Data Response Emails

SoCalGas submitted April 5, 2024, data response to SED March 31, 2024, data request. SoCalGas response to SED question 2 is as follows:

2. Date the T was abandoned and the method of abandonment.

a. SoCalGas cannot locate any service history regarding abandonment. Abandonment method - Tee was capped and abandoned.

SoCalGas refers to the T (stub) as “abandoned”. SED notes that the stub, when it was struck, was not *disconnected from all sources and supplies of gas*” per 49 CFR, Part 192, § 192.727 Abandonment or deactivation of facilities because the stub was connected to the active the 10-inch HPDSM pipe and both carried natural gas at the time of the incident.

Appendix 3 – SoCalGas GIS Map

On April 19, 2024, 0700 hours, SED interviewed SoCalGas’ stand-by employee, Stand-by-29, over the telephone.

Stand-by-29 stated that the 1-inch steel stub on the 10-inch HPDSM pipe was not located because the SoCalGas GIS plans do not show it on the map.

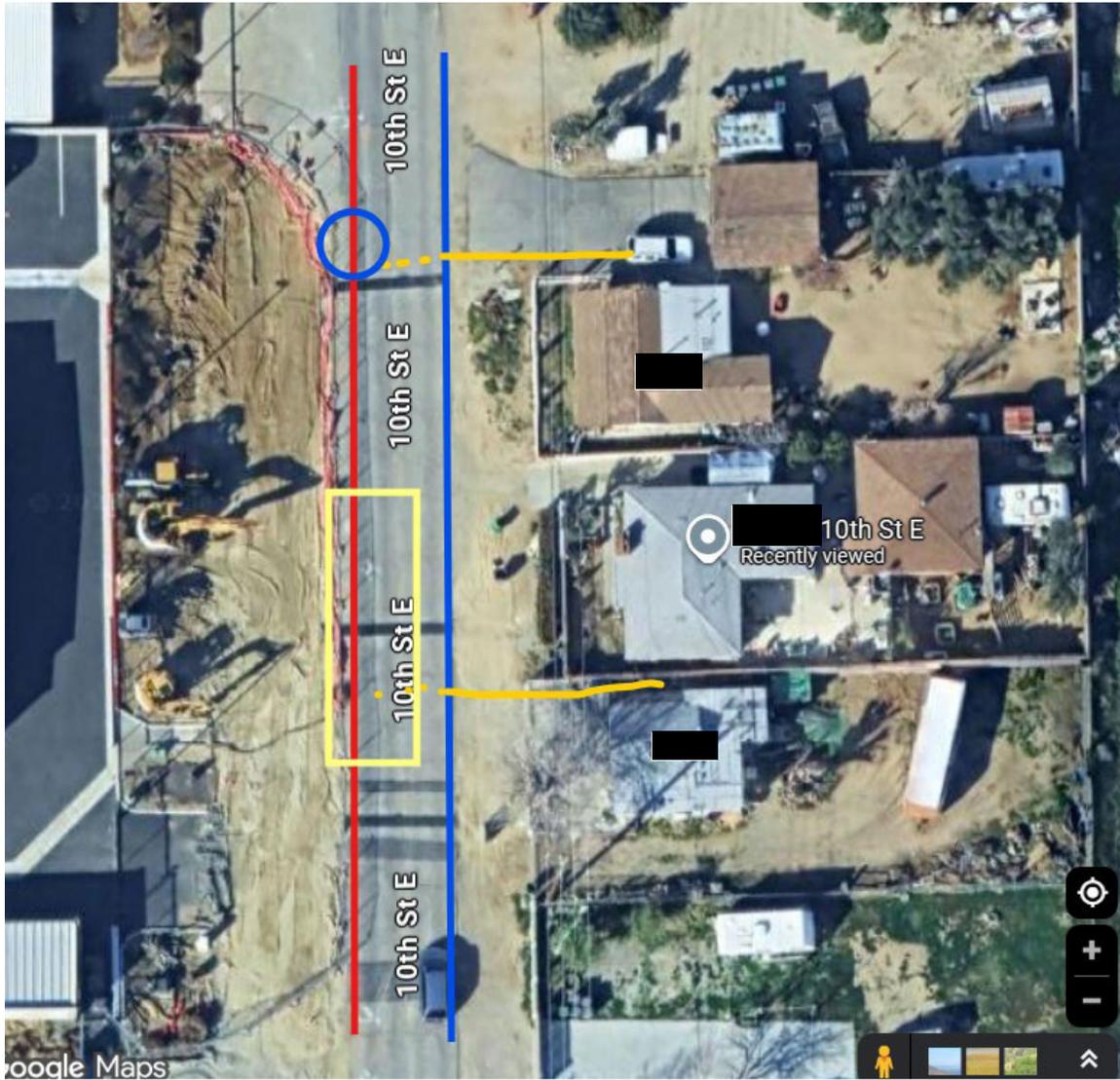
On June 29, 2024, at approximately 1440 hours, SED conducted an interview over the telephone with the third-party contractor, Patriot, who struck the SoCalGas 1-inch stub with the backhoe excavator bucket:

Patriot stated that they were operating within the tolerance zone without guidance from the SoCalGas stand-by because they thought they were clear of potential damage due to a pothole locating the 10-inch HPDSM pipe less than 10-feet away and locating the “ST” service tee, north, near [REDACTED] 10th St E, Palmdale. Patriot crews were not aware of the abandoned 1-inch steel stub location near [REDACTED] 10th St E, Palmdale, when they used the hand tools nor when they were using the backhoe to excavate.

[See maps starting next page]

The active 1-inch service stub was struck by Patriot near [REDACTED] 10th St E, Palmdale (yellow rectangle)

However, the SoCalGas GIS map shows a “ST” service stub (blue circle) near [REDACTED] 10th St E, Palmdale, close to where (orange) service line connected to old (red) main and connects to new (blue line) main.



[See GIS next page]

SoCalGas GIS shows the Service T (blue circle) that was located by Patriot with tools near [REDACTED] **10th St E, Palmdale.**

However, SoCalGas GIS does not show the active 1-inch steel stub (yellow rectangle) that was struck near [REDACTED] **10th St E, Palmdale.**

