SoCalGas
A Sempra Energy utility

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Los Angeles, CA 90013
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April 1, 2020

Mr. Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Ave, 2nd Floor
San Francisco, CA 94102

Dear Mr. Eng:

Attached are SoCalGas's written responses to the Safety and Enforcement Division's (SED) March 2, 2020 revised Notice of Probably Violations (NOPV) related to investigation for DOT #1252045 reportable incident that occurred on July 15, 2019.

Please contact me at [redacted] if you have any questions or need additional information.

Sincerely,

[redacted]

cc: Claudia Almengor, SED
Mahmoud Intably, SED
Kan-Wai Tong, SED
[redacted], SoCalGas

Incident Investigation that occurred on July 15, 2019

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

"Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted."

1.1 SoCalGas' Gas Standard 183.03, Field Guidelines-Emergency Incident Distribution/Customer Service requires the following:

A. *Section 4.1.1.1, Factors in Determining Field Action, Public Safety requires SoCalGas' employees to restrict people from any hazardous area or buildings and maintain proper liaison with police and fire department*.

During SED interviews with SoCalGas, SoCalGas employees stated they did not restrict people from any hazardous area or buildings and did not tell the Fire Department to restrict people from going into the buildings. SED found that SoCalGas failed to restrict people from any hazardous area or buildings and maintain proper liaison with police and fire department. Therefore, SED finds SoCalGas in violation of 192.605(a) for not following its own procedure.

B. *Section 4.2.1 requires SoCalGas' employees to immediately conduct an on-site evaluation of the potential hazards to life and property resulting from escaping* gas.

During SED interviews with SoCalGas, SoCalGas employees acknowledged they did not conduct an on-site evaluation of the potential hazards to life and property resulting from escaping gas. SoCalGas failed to conduct an on-site evaluation of the potential hazards to life and property resulting from escaping gas to determine the extent of the gas leak and take the necessary steps to protect life and property. Therefore, SED finds SoCalGas in violation of 192.605(a) for not following its own procedure.

C. *Section 4.2.5 requires SoCalGas' employees to determine if the concentration of escaping gas is sufficient to make ignition a possibility, especially in or under structures, whether from underground migration or air movement, and to check and monitor perimeters of the area hazard.*

During SED interviews with SoCalGas, SoCalGas employees acknowledged not doing a gas migration survey. Absent a gas migration survey, the concentration of escaping gas was unknown, and the possibility of ignition was unknown. SED found that SoCalGas failed to determine if the concentration of escaping gas was sufficient to make ignition a possibility. Therefore, SED finds SoCalGas in violation of 192.605(a) for not following its own procedure.

D. *Section 4.2.13 requires SoCalGas' employees to maintain surveillance of uncontrolled escaping gas using an approved combustible gas detector to minimize the potential hazard to the general public until assistance arrives.*

During SED interviews with SoCalGas, SoCalGas employees stated they did not use any approved combustible gas detector to maintain surveillance of uncontrolled escaping to minimize the potential hazard to the general public until assistance arrived. Therefore, SED finds SoCalGas in violation of 192.605(a) for not following its own procedure.

E. *Section 4.3.1 requires SoCalGas' response crew upon arrival at the scene to immediately assess the potential hazards of escaping gas. The response crew leader shall review the status of the incident with the responsible company employee on the scene or perform the action and evaluation procedures.*

During SED interviews with SoCalGas, SoCalGas employees stated that the response crew arrived on the scene but did not assess the potential hazards of escaping gas. Furthermore, the crew leader did not review the status of the incident with the response crew. Rather, the response crew left shortly after the arrival of the crew leader. SED found that the response crew leader failed to review the status of the incident with the responsible company employee on the scene or perform the action and evaluation procedures. Therefore, SED finds SoCalGas in violation of 192.605(a) for not following its own procedure.

F. *Section 4.3.2.3 requires SoCalGas' employee to wear appropriate respiratory protective equipment and Gas Extraction Suit if gas was blowing freely when the crew is planning to control the gas at the point of discharge.*

During SED interviews with SoCalGas, SoCalGas' employees acknowledged not using respiratory protective equipment and a Gas Extraction Suit. SED found that SoCalGas failed to follow SoCalGas' Gas Standard to wear respiratory protective equipment and Gas Extraction Suit while trying to control the blowing gas at the point of discharge. Therefore, SED finds SoCalGas in violation of 192.605(a) for not following its own procedure.

1.2 SoCalGas' Gas Standard 184.0245 Leak Investigation, requires SoCalGas' employees conducting leak investigation to do the following:

- *Section 4.1.1.1 requires SoCalGas' employees to leave Form 2001 - Customer Communication Tag – Distribution if the customer is not present.*

During SED interviews with SoCalGas, SoCalGas employees stated they knocked on the customer's door, received no response, and did not leave Form 2001 Customer Communication Tag at the door. The tag was designed to alert tenants of an existing potentially hazardous condition and advise them to contact SoCalGas' employees for assistance prior to access the buildings. SoCalGas failed to complete and leave Form 2001 – Customer Communication Tag - Distribution at the resident's house. Therefore, SED finds SoCalGas in violation of 192.605(a) for not following its own procedure.

SED found seven (7) instances in which SoCalGas employees failed to follow and comply with the

requirement in SoCalGas' Gas Standards and thus violated General Order 112-F, Reference Title 49 CFR, Part 192, Section 192.605(a).

SoCalGas Response:

As mentioned in our November 1, 2019 response, we conducted an extensive investigation of the incident, which resulted in revisions to the impacted gas standards identified in the revised NOPV. We believe that our November 1, 2019 response addresses the issues that are listed in this NOPV. Therefore, we have provided our original November 1, 2019 response and corrective action again below as well as our additional response and corrective action, dated April 1, 2020, to address the revised NOPV.

Response (November 1, 2019):

SoCalGas commenced an investigation immediately following the incident. The ongoing investigation involves two separate inquiries: (1) the cause of the explosion; and (2) the adequacy of our current processes, procedures, and standards. The investigation has reached the preliminary conclusion that the cause of the explosion was damage to a [redacted] service pipe which occurred while a third-party contractor installed a grounding rod, piercing the service line and resulting in a leak and migration of gas into the residence. We have confirmed that a USA mark-out was required but not requested prior to the start of the work. In addition, as part of our investigation we identified Gas Standards 183.03 Field Guidelines - Emergency Incident Distribution/Customer Service and 184.0245 Leak Investigation which have been revised to enhance clarity and promote understanding by employees who respond to the types of incidents as outlined fully below.

Additional Response (April 1, 2020):

Upon the arrival of the Energy Technician-Residential (ETR) at the residence, he immediately spoke with the fire department as part of his on-site evaluation, who informed him that the solar company had hit the line. He continued his evaluation by knocking on the resident's front door and determining that the resident was not home. The ETR also spoke with the contractor regarding the damaged line and clamped the meter. Because the meter had been shut off, it was understood that there was no supply of the gas into the residence. The use of the combustible gas detector was not used because the gas was already blowing (venting to atmosphere). Furthermore, given that the resident was not home and the leak was outside, site restriction was deemed unnecessary. The contractors had also ceased working, therefore additional area restriction was not needed.

When the Energy Technician-Distribution (ETD) arrived at the site, the ETR communicated and reviewed the status of the incident and provided him with documentation regarding the damage. The ETD performed an on-site evaluation by reviewing the incident documentation and assessing the damage. Subsequently, the ETD spoke with the contractor regarding the incident. Based on his experience, he assessed that it was a hit line.

Once the construction crew, composed of two Lead Construction Technicians (LCT), arrived, they conducted an on-site evaluation and determined it was a small leak, outside the home and venting to atmosphere. Further, because a clamshell locking device was installed on the service valve, the gas was interrupted from going inside the house. An LCT communicated with the fire department regarding the status of the scene. At no point did the fire department determine

that restricting individuals at the site was necessary.

Corrective Actions (November 1, 2019):

SoCalGas has revised the identified Gas Standards 183.03 Field Guidelines - Emergency Incident Distribution/Customer Service and 184.0245 Leak Investigation and published two Information Bulletins to add clarity to the procedures. The changes are listed in the attached Information Bulletins. In addition, these bulletins were reviewed by impacted management and non-management operations personnel.

Furthermore, situational training exercises have been added to SoCalGas' Centralized training curriculum for both Distribution and Customer Service employees. Finally, annual situational training exercises will be conducted at the districts with both Distribution and Customer Service departments to reinforce continued understanding of the procedures and requirements related to emergency incident response applicable gas standards.

Additional Corrective Actions (April 1, 2020):

SoCalGas Gas Operations and Customer Service employees have reviewed the updated Company Operations Standard 183.03 (Emergency Incident Distribution/Customer Service).

Attachments (2)

SCG CUSTOMER SERVICE FIELD		Information Bulletin No.	CSF190805
Subject:	**Field Guidelines - Emergency Incident Distribution/Customer Service**		
Publish Date: 08-21-19	Due Date: 08-30-19	NOP Code:	IBSC0294
Responsible Person: [redacted]		Phone:	[redacted]

IMPACTED ORGANIZATIONS: **SoCalGas Customer Service Field Operations, Operations Training**

FIELD ACTION:

By COB 08-30-2019, District Management must discuss this Information Bulletin with impacted Management and Field Employees; all employees will complete their LMS assignment to document the Bulletin review

Note: This Information Bulletin is an update to and replaces Information Bulletin CSF190805 published on August 5, 2019.

PURPOSE:

- To clarify the procedure for when and how the First Qualified Employee on scene of an emergency incident transfers the emergency response responsibilities to another qualified employee.
- To reiterate and clarify the procedure for Company employees responding to emergency incidents involving escaping gas from a leak, line break, or damage (hit lines)
- To reiterate and clarify that incidents involving damaged company facilities, also known as "hit lines," are defined as Emergency Incidents and must be addressed following the policies and procedures described in GS 183.03
- To clarify the procedure for the First Qualified Employee on scene of an emergency incident, including:
    - How to determine whether gas has migrated into surrounding building(s); and
    - Precautions to take when gas has migrated into surrounding building(s)
- To reiterate the procedure for communication with Fire and/or Police Departments on scene by Trained and Qualified Employees when responding to emergency incidents
- To reiterate and clarify the procedure for Trained and Qualified response crews when responding to emergency incidents, including:
    - Immediately assessing the potential hazards of the escaping gas;
    - Reviewing the status of the incident with the responsible Company employee on the scene; and
    - Proceeding with the safest method available when controlling escaping gas

PROCEDURE OVERVIEW:

- The First Qualified Employee dispatched to the scene of an emergency incident must perform each of the following steps:
    - Immediately conduct an onsite evaluation of the potential hazards to life and property resulting from escaping gas
    - Establish communications with fire and police departments on the scene as soon as possible
    - Determine the area limit where gas is present and make a perimeter check using a Company approved Combustible Gas Indicator (CGI) to determine if gas has

migrated into substructures or surrounding buildings, either through the ground or through the air

- **Note: Leak indications of 60% LEL (2.7% Volume Gas) or greater detected at the outside wall or foundation of the surrounding building(s) must be treated as if gas has migrated underground into the building**
- **Note: Atmospheric readings of 20% LEL (0.9 % Volume Gas) or greater detected inside of buildings or structures requires evacuation of people and restrict entry into the premises**

    - Determine if the concentration of escaping gas is sufficient to make ignition a possibility, especially in or under structures, whether from underground migration or air movement
    - Evacuate and restrict people from any hazardous areas, including buildings or structures, if the concentration of gas indicates ignition is a possibility. In addition:
        - Determine the need for rerouting or blocking of vehicular and pedestrian traffic
        - Use Evacuation Tape (Stock Code N399372) to delineate the potentially hazardous area from adjacent safe areas
        - Seek to eliminate and keep sources of ignition from restricted areas.
        - Check and periodically monitor perimeters of the area of hazard to determine if gas is migrating into surrounding buildings until escaping gas is controlled and conditions are no longer hazardous

Note: Additional follow up is required until indications under a building or tunnel, at the outside wall of a building, or where gas could potentially migrate to an outside wall of a building have diminished to a sustained level below 4,500 PPM or 10% LEL, see GS 184.0245, *Leak Investigation.*

- The First Qualified Employee may transfer the action and hazard assessment responsibilities identified in section 4.2 of GS 183.03 and reiterated above in this Information Bulletin to another qualified employee on scene only after:
    - Verbally confirming which of the requirements from GS 183.03 he or she has taken with the relieving qualified employee, including what actions are still needed;
    - The relieving qualified employee on scene has verbally acknowledged what still needs to be completed, and assumed the emergency response responsibilities; and
    - The relieving qualified employee verbally relieved the First Qualified Employee.
- When the incident complexity exceeds the capabilities of the First Qualified Employee or is expected to exceed his or her capabilities, the First Qualified Employee must immediately request assistance from Dispatch for a more qualified employee.
- Emergency incidents involving damaged company facilities, also referred to as "hit lines," must be investigated and repaired in accordance with the policies and procedure defined in GS 183.03 Field Guidelines - Emergency Incident Distribution /Customer Service
- If gas indications are noted and they reach a level of greater than 60% LEL (2.7% Volume Gas) (in the area that work will be performed), appropriate respiratory protective equipment and Gas Extraction Suit™ are required in the remote/weld hole. See GS 166.0076, Working in Flammable Atmospheres
- Control of gas at the point of discharge may only be considered after all control options have been exhausted and the following conditions have been met:

- Appropriate respiratory protective equipment and Gas Extraction Suit™ with all required personal protective equipment must be used
- The gas is blowing freely into the atmosphere, the work can be performed safely, and the escaping gas can safely be controlled with approved tools and equipment. This equipment may include, but is not limited to, clamps, various approved steel squeezing devices, various approved polyethylene PE squeezing devices, etc.

GS 183.03 *Field Guidelines - Emergency Incident Distribution/Customer Service* and GS 184.0245 *Leak Investigation* will be updated and published to provide clarification and guidance when responding to emergency incidents.

REFERENCE(S):

GS 183.03 *Field Guidelines - Emergency Incident Distribution /Customer Service*
GS 184.0245 *Leak Investigation*
GS 166.0076, *Working in Flammable Atmospheres*

If you have any questions or concerns, please contact [redacted] - Technical Advisor at [redacted], or email at [redacted]

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Brief: provide clarification on the hand-off requirements for the First Qualified Employee when transferring action and evaluation responsibilities to another qualified employee.

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SCG DISTRIBUTION OPERATIONS		Information Bulletin No.		INFO-1948
Subject:	**REVISED Field Guidelines - Emergency Incident Distribution / Customer Service**			
Publish Date: **08/22/2019**		Due Date: **08/30/2019**	NOP Code:	IBSC0351
Responsible Person: [redacted]			Phone:	[redacted]

IMPACTED ORGANIZATIONS: Gas Operations Distribution, Transmission, Operations Training, Customer Service

ACTION REQUIRED:

District Management must discuss this Info Bulletin with impacted Management and Field Employees and document using Form 5300 by COB 08-30-2019.

Note: This Information Bulletin is an update to and replaces Information Bulletin No. INFO-1948 published on August 5, 2019.

PURPOSE:

- To clarify the procedure for when and how the First Qualified Employee on scene of an emergency incident transfers the emergency response responsibilities to another qualified employee.
- To reiterate and clarify the procedure for Company employees responding to emergency incidents involving escaping gas from a leak, line break, or damage (hit lines).
- To reiterate and clarify that incidents involving damaged company facilities, also known as "hit lines," are defined as Emergency Incidents and must be addressed following the policies and procedures described in GS 183.03, *Field Guidelines - Emergency Incident Distribution /Customer Service.*
- To clarify the procedure for the First Qualified Employee on scene of an emergency incident, including:
  - How to determine whether gas has migrated into surrounding building(s); and
  - Precautions to take when gas has migrated into surrounding building(s)
- To reiterate the procedure for communication with Fire and/or Police Departments on scene by Trained and Qualified Employees when responding to emergency incidents.
- To reiterate and clarify the procedure for Trained and Qualified response crews when responding to emergency incidents, including:
  - Immediately assessing the potential hazards of the escaping gas;
  - Reviewing the status of the incident with the responsible Company employee on the scene; and
  - Proceeding with the safest method available when controlling escaping gas.

PROCEDURE OVERVIEW:

- The First Qualified Employee dispatched to the scene of an emergency incident must perform each of the following steps:
  - Immediately conduct an onsite evaluation of the potential hazards to life and property resulting from escaping gas.

- Establish communications with fire and police departments on the scene as soon as possible.
- Determine the area limit where gas is present and make a perimeter check using a Company approved Combustible Gas Indicator (CGI) to determine if gas has migrated into substructures or surrounding buildings, either through the ground or through the air.

Note:	**Leak indications of 60% LEL (2.7% Volume Gas) or greater detected at the outside wall or foundation of the surrounding building(s) must be treated as if gas has migrated underground into the building.**

Note:	**Atmospheric readings of 20% LEL (0.9 % Volume Gas) or greater detected inside of buildings or structures requires evacuation of people and restrict entry into the premises.**

- Determine if the concentration of escaping gas is sufficient to make ignition a possibility, especially in or under structures, whether from underground migration or air movement.
- Evacuate and restrict people from any hazardous areas, including buildings or structures, if the concentration of gas indicates ignition is a possibility. In addition:
  - Determine the need for rerouting or blocking of vehicular and pedestrian traffic.
  - Use Evacuation Tape (Stock Code N399372) to delineate the potentially hazardous area from adjacent safe areas.
- Seek to eliminate and keep sources of ignition from restricted areas.
- Check and periodically monitor perimeters of the area of hazard to determine if gas is migrating into surrounding buildings until escaping gas is controlled and conditions are no longer hazardous.

Note:	Additional follow up is required until indications under a building or tunnel, at the outside wall of a building, or where gas could potentially migrate to an outside wall of a building have diminished to a sustained level below 4,500 PPM or 10% LEL, see GS 184.0245, *Leak Investigation*.

- The First Qualified Employee may transfer the action and hazard assessment responsibilities identified in section 4.2 of GS 183.03, *Field Guidelines - Emergency Incident Distribution /Customer Service* and reiterated above in this Information Bulletin to another qualified employee on scene only after:
  - Verbally confirming which of the requirements from GS 183.03, *Field Guidelines - Emergency Incident Distribution /Customer Service* he or she has taken with the relieving qualified employee, including what actions are still needed;
  - The relieving qualified employee on scene has verbally acknowledged what still needs to be completed, and assumed the emergency response responsibilities; and
  - The relieving qualified employee verbally relieved the First Qualified Employee.
- When the incident complexity exceeds the capabilities of the First Qualified Employee or is expected to exceed his or her capabilities, the First Qualified Employee must immediately request assistance from Dispatch for a more qualified employee.
- Emergency incidents involving damaged company facilities, also referred to as "hit lines," must be investigated and repaired in accordance with the policies and procedure defined in GS 183.03, *Field Guidelines - Emergency Incident Distribution /Customer Service.*

- If gas indications are noted and they reach a level of greater than 60% LEL (2.7% Volume Gas) (in the area that work will be performed), appropriate respiratory protective equipment and Gas Extraction Suit™ are required in the remote/weld hole. See **GS 166.0076,** *Working in Flammable Atmospheres*.
- Control of gas at the point of discharge may only be considered after all control options have been exhausted and the following conditions have been met:
    - Appropriate respiratory protective equipment and Gas Extraction Suit™ with all required personal protective equipment must be used
    - The gas is blowing freely into the atmosphere, the work can be performed safely, and the escaping gas can safely be controlled with approved tools and equipment. This equipment may include, but is not limited to, clamps, various approved steel squeezing devices, various approved polyethylene PE squeezing devices, etc.

GS 183.03, *Field Guidelines - Emergency Incident Distribution /Customer Service* and **GS 184.0245,** *Leak Investigation* will be updated and published to provide clarification and guidance when responding to emergency incidents. If you have any questions or concerns, please contact [redacted] - Technical Advisor at [redacted], or email at [redacted]

REFERENCES:

GS 183.03, *Field Guidelines - Emergency Incident Distribution /Customer Service*

GS 184.0245, *Leak Investigation*

GS 166.0076, *Working in Flammable Atmospheres*

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Non-O&M 49 CFR Codes & Impacted Sections of Document	
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Part of Transmission IMP (TIMP)	No
Part of Storage IMP (SIMP)	No
Impacts GO112F	No
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Impacts Underground Gas Storage Projects (DOGGR)	No
14 CCR Codes & Impacted Sections of Document	
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