

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 29, 2018

**GI-2018-04-SDG&E45**

Jimmie Cho, Senior Vice President  
Southern California Gas Company  
Gas Operations and System Integrity  
555 W 5<sup>th</sup> Street, GT21C3  
Los Angeles, CA 90013

**Subject: SED Closure Letter for the General Order (G.O.) 112-F Comprehensive Operation and Maintenance Inspection of San Diego Gas & Electric Company's Borrego Springs Liquefied Natural Gas (LNG) Facility**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed San Diego Gas and Electric Company's (SDG&E) response letter dated August 20, 2018 for the findings identified during the G.O. 112-F Comprehensive Operation and Maintenance (O&M) Inspection. This inspection of SDG&E's Borrego Springs Liquefied Natural Gas Facility (Inspection Unit) was conducted from April 24-26, 2018.

A summary of the inspection findings documented by the SED, SDG&E's response to the findings, and SED's evaluation of SDG&E's response for each finding is outlined in SED's summary of inspection findings.

This letter serves as the official closure of the 2018 O&M Inspection of SDG&E's Borrego Springs LNG facilities and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program.

Thank you for your cooperation in this inspection. Please contact Michelle Wei at (213) 620-2780 or by e-mail at [miw@cpuc.ca.gov](mailto:miw@cpuc.ca.gov) if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthewson Epuna".

Matthewson Epuna  
Program and Project Supervisor, Gas Safety & Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

CC: Troy Bauer, SDG&E, Kan Wai Tong, GSRB/SED, Kenneth Bruno, GSRB/SED, Claudia Almengor, GSRB/SED, Kelly Dolcini, GSRB/SED

**Summary of Inspection Findings**  
**2018 SDG&E Borrego Springs LNG**  
**April 24-26, 2018**

**I. SED's Recommendations**

1. SDG&E must comply with several different points of regulation when refilling the LNG tanks at the facility. SED noted that while SDG&E has adequate procedures in place to address these regulations, the record keeping process is only a sign off sheet that assumes the many steps were followed correctly. In contrast, the facility site inspection has a checklist showing all the points that an employee would need to review to make it a complete inspection and helps ensure that he or she does not miss anything. SED recommends that SDG&E develop a record keeping method so that the employee can be assured that no safety steps were missed during the filling or transfer process as well as being better able to demonstrate to SED that necessary steps were followed.

**SDG&E's Response:**

SDG&E agrees with SED's recommendation for a checklist form, as noted above, and has developed checklists for LNG fill and LNG transfer activities that will serve as records. The new checklist forms were shared with the lead SED auditor in July 2018. SDG&E will begin using the new checklist forms in August 2018. These records will be maintained at the SDG&E Miramar facility and available for SED's review at future inspections.

**SED's Conclusion:**

SED has reviewed SDG&E's response and accepts the proposed corrective actions. SED acknowledges that the proposed corrective actions will sufficiently address the aforementioned recommendation. However, SED may review the implementation of these stated corrective actions during future inspections.