



Troy A. Bauer  
*Pipeline Safety and Compliance  
Manager*  
555 W. Fifth Street, MLGT-11A6  
Los Angeles, CA 90013  
Phone: 909-376-7208

January 6, 2017

Mr. Ken Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
320 W. Fourth Street, Suite 500  
Los Angeles, CA 90013

Dear Mr. Bruno:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112 inspection of San Diego Gas and Electric's (SDG&E) North Region (North Coast and North East) on September 19-23, 2016. The inspection included a review of the district regulator station, pipeline welding projects, and emergency valve maintenance records for the period of January 1, 2013 through December 31, 2015, as well as a representative field sample of those facilities. SED staff also reviewed the Region's operator qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff noted one probable violation and noted one recommendation. Attached is SDG&E's written response and corrective actions.

Please contact Troy A. Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,

  
Troy A. Bauer

CC: Fred Hanes / SED-GSRB  
Kan-Wai Tong / SED-GSRB  
Matt Epuna / SED-GSRB

ATTACHMENTS

**ATTACHMENT 1**  
**Response to Probable Violation**

Title 49 CFR §192.739(a) states in part: *“Each pressure limiting station, relief device (except rupture discs), and pressure regulation station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests...”*

SED reviewed the maintenance records and noted one instance of a missed date for Regulator Station 0112 in 2014. The 12-month maintenance was due on January 29, 2014, but the inspection was performed on May 7, 2014. The inspection date exceeded the 15 month allowance by 6 days, excluding weekend days.

SDG&E is in violation of 49 CFR §192.739 (a).

**Response:**

SDG&E agrees that District Regulator Station #0112 received its 2014 annual inspection 6 days beyond the compliance due date. The May 7, 2014 inspection results indicated the station was in good working order.

SDG&E’s Meter and Regulation (M&R) Staff has been working on the development of enhanced M&R reports to include work order tracking capabilities for District Regulator Station (DRS) schedules. This report will be enhanced to include the last actual inspection date, which will allow the local management team to monitor stations that may be nearing their compliance deadlines. Initial M&R reports are scheduled to be deployed in January 2017 and the enhancement will be added in time for the January 2017 deployment.

SDG&E will train Local Supervision and clerical support employees on how to run and monitor these new reports. In addition, SDG&E will stress the need for employees to monitor the new reports to avoid late inspections.

## Attachment 2

### Response to Concerns and Recommendations

#### Irrigation water flooding vaults

SED noted that some of the regulator station vaults and valve enclosures trapped landscape irrigation run-off water without drainage. SDG&E typically schedule vacuum trucks to drain the vaults with known drainage flooding.

Although, SED did not observe atmospheric corrosion on the equipment in the vaults sampled during the inspection, but noted that the flooding is frequently due to regular irrigation of nearby landscape. The equipment was completely submerged in the flood water, which prevents maintenance activities until the water is removed, and could possibly affect equipment performance.

SDG&E is aware of the stations that are routinely flooded and has established the practice of contracting with a vacuum truck service to remove the water shortly before scheduled maintenance work.

SED noted that 49 CFR §192.189 (a) states: "Each vault must be designed so as to minimize the entrance of water". While it is likely the initial vault design minimized entrance of water, subsequent operating experience shows that water entrance is not minimized.

SED recommends that SDG&E consider modifications to these enclosures to prevent submersion of the equipment.

#### **Response:**

SDG&E is assessing several possible solutions to address standing water in solid bottom vaults, such as coring a rock filled drainage hole in the bottom of the vaults. Once the available options have been evaluated, SDG&E will move forward to address stations identified as having water in vault issues.