

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 8, 2016

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

GI-2016-09-SDG-47-02B

SUBJECT: General Order 112 Gas Audit of San Diego North Region

Dear Mr. Cho:

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.<sup>1</sup> The inspection included a review of 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's findings are noted in the enclosed Summary of Inspection Findings (Summary). The Summary reflects only those particular records and facilities that SED inspected during this audit.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by SDG&E to address the violations and observations noted in the Summary.

If you have any questions, please contact Fred Hanes at (415) 703-5264 or by email at [fred.hanes@cpuc.ca.gov](mailto:fred.hanes@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

cc: Troy Bauer, Pipeline Safety and Compliance, SoCalGas  
Nadia Hang, Pipeline Safety and Compliance, SoCalGas

<sup>1</sup> General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 156-06-044.

## SUMMARY OF INSPECTION FINDINGS

### **I. Probable Violations**

*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).

### **II. Areas of Concern/ Observations/ Recommendations**

#### **A. 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 frequent due to the regular irrigation of the nearby landscape. The equipment was completely submerged in the flood water t, which prevented 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. .