

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 17, 2017

Jimmie Cho, Senior Vice President
Gas Operations and System Integrity
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

GI-2017-08-SDG46-03B

Subject: General Order (G.O.) 112¹ Operation and Maintenance Inspection of San Diego Gas and Electric Company's Patrolling and Leakage Surveys in the South Distribution Region

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F, Operation and Maintenance Inspection of San Diego Gas and Electric Company's (SDG&E) patrolling and leakage survey processes in the South Distribution Region (Inspection Unit) on August 28 through September 1, 2017. The inspection included a review of the Inspection Unit's leak survey and patrolling records for calendar years 2013 to 2016 and field inspections of pipeline facilities in the Beach Cities, Eastern, and Metro districts. Also, SED staff reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff made four recommendations during the course of this inspection, which are described in the enclosed "Summary of Inspection Findings". SED staff did not identify any probable violations.

Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by SDG&E.

If you have any questions, please contact Michelle Wei, at (213) 620-2780 or by email: miw@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

CC: Michelle Wei, SED/GSRB
Troy Bauer, Sempra
Kan Wai Tong, SED/GSRB

1. General Order 112-F was adopted by the Commission on June 25, 2015 via 15-06-044

Summary of Inspection Findings
2017 SDG&E - South Distribution Inspection
August 28 – September 1, 2017

SED Concerns and Recommendations

1. SDG&E's practice for leak survey records is to have the leak survey technician maintain his or her records on one map while working in the field ("truck map") and thereafter transfer all notes to a clean copy of the map in the office ("office map"). SED reviewed the office maps and noted some instances where some pipelines appeared not to have been surveyed because they were not marked as complete. However, upon review of the truck map, the pipelines were marked as completed. Therefore, SED recommends that SDG&E enhance its quality assurance program and make sure the details of the work documents are transferred to the official records.
2. SDG&E's Gas Standard procedure G8145 "Leakage Surveys", section 10.1.1.1 states that "The Gas Patroller is required to bracket the completed area(s) and/or segments they surveyed for that day on the Leakage Survey map using a blue pen." During record review, SED noted that SDG&E's employees instead drew a bubble around all the pipes that they completed the survey for that day. While both methods of documentation are similar, SED recommends that SDG&E have its Gas Patrollers comply with the instructions in Section 10 of the G8145.
3. During record review, SED noted that there were several instances where follow up work was necessary after an inspection order but no such work was documented. Upon further investigation, SED noted that SDG&E had employed contractors to remediate the conditions found but had not documented it in the original work order. SDG&E was able to provide supplemental documentation to show that the follow up work was completed, but SED recommends that SDG&E develop a system so that all remedial work can be traced from the original work orders.
4. SED completed a field inspection of BS-47 in the Beach Cities District. BS-47 is a short section of aboveground pipe on a dirt hillside. There is no foot traffic in that area, but SED is concerned that earth movement on the hillside may damage the pipeline. Therefore, SED recommends that SDG&E change the inspection frequency from annual to quarterly for BS-47 to ensure that the condition of the pipeline remains stable.