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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, Operation and Maintenance Inspection of San Diego Gas & Electric Company's (SDG&E) Patrolling and Leakage Surveys in the South Distribution Region from August 28, 2017 to September 1, 2017. The inspection included a review of the Inspection Unit's leak survey and patrolling records for calendar years 2013 through 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 identified 4 recommendations. Attached are SDG&E's written responses.

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

Sincerely,



Troy A. Bauer

CC:  
Michelle Wei, SED/GSRB  
Kan Wai Tong, SED/GSRB

**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.

**RESPONSE:** SDG&E's current QA/QC process, as of 2017, includes review of the truck map and office map to ensure all information is transferred accurately. Once reviewed, the Supervisor stamps the office map and enters "QC (Quality Control) By" and "Date" information on the map. Both maps are maintained according to established record retention schedules with the office map in Miramar and the truck map at an offsite storage facility.

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.

**RESPONSE:** SDG&E employees that perform compliance Leak Surveys are being trained on how to "bracket" sections of a survey map as they complete them. All employees are expected to begin "bracketing" maps in accordance with SED's recommendation in the fourth quarter of 2017.

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.

**RESPONSE:**

Follow-up remediation work is often assigned to other groups within SDG&E or to contractors. The systems used by these other organizations cannot always interface and communicate with the SAP Maintenance and Inspection platform. Notes can be, and generally are, entered into the SAP work order in a manner that aids in locating the follow-up work documentation. As noted by SED, SDG&E was able to provide documentation to show the completed work, albeit through a manual process that may involve searching other systems. SDG&E will continue to look for ways to improve this process.

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.

**RESPONSE:** BS-47 has been placed on a permanent quarterly inspection cycle. Additionally, Technical Services will review this location for a possible longer-term solution such as a relocation.