

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

July 5, 2017

GI-2017-04-SDG-48-01C

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

**Subject: General Order (G.O.) 112 Operation and Maintenance Inspection of San Diego Gas and Electric Company's Transmission Patrolling & Leak Surveying Facilities**

Dear Mr. Cho:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Joel Tran, Alula Gebremedhin, Gordon Kuo, and Monica Robledo conducted a General Order 112 inspection of San Diego Gas and Electric Company's (SDG&E) Transmission facilities (Inspection Unit) from April 24-28, 2017.<sup>1</sup> The inspection included a review of the Inspection Unit's operation and maintenance records for the years 2013 through 2016, and a field inspection of a representative sample of the Inspection Units' facilities. SED staff also reviewed the Inspection Unit's operator qualification records, which included a field observation of randomly selected individuals performing covered tasks.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter.

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

If you have any questions, please contact Joel Tran at (415) 515-3442 or by email at [joel.tran@cpuc.ca.gov](mailto:joel.tran@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, Sempra ([TBauer@semprautilities.com](mailto:TBauer@semprautilities.com))  
Kelly Dolcini, SED ([kelly.dolcini@cpuc.ca.gov](mailto:kelly.dolcini@cpuc.ca.gov))  
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<sup>1</sup> General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 15-06-044.

## SUMMARY OF INSPECTION FINDINGS

### I. Probable Violations

1. Title 49 CFR §192.5 states:

(a) *“This section classifies pipeline locations for purposes of this part. The following criteria apply to classifications under this section.*

...

(2) *Each separate dwelling unit in a multiple dwelling unit building is counted as a separate building intended for human occupancy.*

...

(b) *Except as provided in paragraph (c) of this section, pipeline locations are classified as follows:*

...

(4) *A Class 4 location is any class location unit where buildings with four or more stories above ground are prevalent.”*

During SED’s review of Class Location Survey records, SED noted a location (HCA Map 1600\_30) where SDG&E had discovered the construction of a major residential building. The complex, Casa Mira View (9800 Mira Lee Way), consists of all five story buildings and SDG&E first discovered the new construction during an annual Class Location Survey on 2/28/2013. SDG&E classified this area as a Class 3 location.

On 3/6/2014, SDG&E’s Class Location Survey noted *“465 dwelling units have been built so far and a total of 2167 will be built by the end of the project. Phase 1 should be fully occupied by the end of 2014.”* SDG&E still classified this area as a Class 3 location.

On 3/16/2015, SDG&E’s Class Location Survey noted *“810 dwelling units have been built and occupied so far and a total of 2167 will be built by the end of the project. Phase 1 is fully occupied. Phase 2 will begin being occupied in Q3 2015.”* SDG&E still classified this area as a Class 3 location.

On 3/17/ 2016, SDG&E’s Class Location Survey noted *“1200 units have been built and occupied so far and a total of 2167 will be built by the end of the project. Phase 2 is 50% occupied.”* SDG&E still classified this area as a Class 3 location.

On 4/27/17, SED conducted a field visit of the area and found that buildings with four or more stories above ground are prevalent. SDG&E failed to classify the residential building complex as a Class 4 location, and is therefore in violation of §192.5(b)(4).

## **II. Recommendations**

1. During SED's field inspection of Leakage Surveys, SED noted that conditions of the terrain along the pipeline can vary drastically, where the pipeline may alternate between over and under a paved surface. Each of SDG&E's Leakage Surveying tools (OMD, DP-IR, etc.) has its own advantages and disadvantages, depending on terrain and weather conditions. However, this information is not documented, which may result in Leak Surveyors attempting to use a tool that is disadvantageous to use. Leak Surveyors currently make a determination of which tool to use for each situation based on experience.

SED recommends documenting the ideal tool(s) to be used on each Leakage Surveying map so that Leak Surveyors can reference the maps to be advised of the best tool(s) to use.