

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 22, 2016

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

GI-2015-08-SEM40-05

**Subject: General Order (G.O.) 112<sup>1</sup> Inspection of Southern California Gas Company's and San Diego Gas & Electric Company's (collectively referred to as Sempra Energy Utilities) Public Awareness Program**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112<sup>1</sup> Inspection of Southern California Gas Company's (SCG) and San Diego Gas & Electric Company's (SDG&E) (collectively known as Sempra Energy Utilities (Sempra)) Public Awareness Program (PAP) on August 4-6, 2015. During the inspection, SED staff used the Pipeline and Hazardous Materials Safety Administration (PHMSA) Public Awareness Program Effectiveness Form (Form 21) as a reference guide to conduct the inspection.

SED staff did not identify any probable violations of G.O. 112<sup>1</sup>, Reference Title 49 Code of Federal Regulations (CFR), Part 192 Section 192.616. However, SED made four recommendations described in the enclosed "Summary of Inspection Findings".

Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by Sempra. Pursuant to Commission Resolution ALJ-274, SED staff has the authority to issue citations for each violation discussed during the inspection.

If you have any questions, please contact Michelle Wei, at (213) 620-2780.

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  
Jeff Koskie, 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  
2015 Sempra PAP Inspection  
August 4-6, 2015**

**SED's Recommendations**

**1. Audit Observation Identified in Protocol 1.04, Stakeholder Audience Identification  
Reference: Title 49 CFR, Part 192 Section 192.616(f)**

Protocol 1.04 states:

*“Does the operator’s program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?”*

Title 49 CFR, Part 192 Section 192.616(f) states:

*“The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas.”*

Sempra’s PAP Plan has adequate methods to identify the individual stakeholders in the four affected stakeholder audience groups. During the discussion of the addition of the Borrego Springs LNG facility to its PAP plan, Sempra stated that it liaisons with the local Fire Department and the mobile home park’s office manager since most of the Park’s residents do not live at the park year-round. SED recommended that Sempra identify a medium to deliver the messages directly to each home in the park, perhaps in winter when most of the residents are in the park.

**2. Audit Observation Identified in Protocol 2.03, Messages on Pipeline Facility Locations  
Reference: Title 49 CFR, Part 192 Section 192.616(e)**

Protocol 2.03 states:

*“Did the operator develop and deliver messages to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?”*

Title 49 CFR, Part 192 Section 192.616(e) states:

*“The program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.”*

Sempra delivered messages to the affected entities noted in 49 CFR, Part 192 Section 192.616(e). In the 2012 PAP Inspection Letter, SED recommended that Sempra target its messaging to schools about their responsibilities to maintain their master-metered distribution pipeline or buried yard gas pipeline systems. Sempra responded to the recommendation by including messages regarding these types of systems in their mailings to schools. However, SED is concerned that Sempra’s messages were too general and that schools’ personnel may dismiss the

messages as being non applicable. SED recommends that Sempra identify schools have master-metered distribution pipeline or buried yard gas pipeline and provide refined targeted messages to those schools.

### **3. Audit Observation Identified in Protocol 4.03, Measure Percentage of Stakeholders Reached**

**Reference: Title 49 CFR, Part 192 Section 192.616(c)**

Protocol 4.03 states:

*“Did the operator determine the percentage of the individual or entities actually reached within the target audience within all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?”*

Title 49 CFR, Part 192 Section 192.616(c) states:

*“The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.”*

Sempra determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences for all of its surveys. During the inspection, Sempra explained its processes if the level of response did not meet its 10% threshold for estimating the percentage of individuals or entities actually reached within each intended stakeholder audience group. However, Sempra’s PAP plan did not address the processes for estimating the percentage of individuals or entities reached in sufficient detail. SED recommends that Sempra address this in its PAP Plan, including the methods and types of surveys it will conduct, as it explained to SED during the inspection.

### **4. Audit Observation Identified in Protocol 4.06, Measure Bottom-Line Results**

**Reference: Title 49 CFR, Part 192 Section 192.616(c)**

Protocol 4.06 states:

*“In evaluating its public awareness program effectiveness, did the operator attempt to measure bottom-line results of its program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? Did the operator consider other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines? If not, did the operator provide justification in its program or procedural manual?”*

Title 49 CFR, Part 192 Section 192.616(f) states:

*“The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its*

*program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.”*

Sempra did not near misses data. SED recommends that Sempra monitor, track, trend, and integrate the near miss data into its PAP program. If Sempra tracks and trend the near miss data, it can target its messages to the individuals/entities that are most likely to damage its pipeline.