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January 13, 2017

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 General Order (G.O.) 112 Comprehensive review and inspection of the Sempra Energy Utilities' Operation and Maintenance (O&M) Procedures that included the Southern California Gas Company's (SoCalGas) Gas Standards and Procedures and San Diego Gas and Electric Company' Standards and Procedures on January 11-15, 2016. SED staff reviewed both companies' written O&M procedures pursuant to G.O. 112, Reference Title 49, Code of Federal Regulations (49 CFR), Parts 191 and 192.

SED staff noted one probable violation and made seven recommendations for SoCalGas. Attached is SoCalGas' written response and corrective actions.

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

Sincerely,


Troy A. Bauer

CC: Mahmoud (Steve) Intably, SED/GSRB
Matthewson Epuna, SED/GSRB
Kan Wai Tong, SED/GSRB,

ATTACHMENTS

ATTACHMENT 1
Response to Probable Violation

Title 49 CFR Part 192, Section §192.727 Abandonment or deactivation of facilities

§192.727 Abandonment or deactivation of facilities states:

“(a) Each operator shall conduct abandonment or deactivation of pipelines in accordance with the requirements of this section.

“(b) Each pipeline abandoned in place must be disconnected from all sources and supplies of gas; purged of gas; in the case of offshore pipelines, filled with water or inert materials; and sealed at the ends. However, the pipeline need not be purged when the volume of gas is so small that there is no potential hazard.”

SoCalGas Gas Standard 184.0080 Abandonment of Gas Services and Gas Light Tap Assemblies did not address the service line purging requirement. SED noted that SCG Gas Standard 184.0080 did not address purging of service lines. Therefore, SoCalGas is in violation of General Order 112-F¹, Reference Title 49 CFR, Part 192, Section §192.727(a)(b).

Response:

SoCalGas Gas Standard 184.0080, Abandonment of Gas Services and Gas Light Tap Assemblies, has been modified to clearly specify when purging is required when abandoning services.

An outside consultant with expertise in this area of risk performed an analysis to determine “when the volume of gas is so small that there is no potential hazard” as stated in Title 49 CFR, Part 192, Section 192.727(b). The analysis concluded that pipelines 1-inch and less in diameter, and 100 feet or less in length, do not present a potential hazard if not purged of gas, and therefore can be abandoned without purging in accordance with Section 192.727(b). All other services that do not meet this criteria will be purged prior to abandonment. The following language and table have been added to SoCalGas Gas Standard 184.0080 to specify when purging is required:

4.2. Purging of service lines:

See Table below for Abandoned Service Lines purging requirements:

Nominal Diameter	100 ft. in Length or less	Greater than 100 ft. in Length
≤ 1" (less than or equal to 1")	Not Required	Yes*
>1"	Yes*	Yes*

*Purging shall be in accordance with **Standard 182.0160, Purging Pipelines and Components**

Attachment 2
Response to Concerns and Recommendations

SoCalGas Gas Standard 184.0085 Abandonment or Inactivation of Gas Distribution Pipelines, Section 4.1 Abandon mains and supply lines, 4.1.5 “*Purging pipeline of gas in accordance with SCG Gas Standard 182.0160 Purging pipelines and Components*” and in the same section under Note: “*Purging may be omitted when the volume of gas is so small that there is no potential hazard*”. SED noted that SoCalGas Gas Standard 184.0085 parallel the regulation and did not justify (by theory or study the practice) why certain service lines are purged and not others during the abandonment or inactivation of service. SED recommends that SoCalGas apply sound and best practices in determining the purging requirement for the service lines.

Response:

SoCalGas Gas Standard 184.0085 has been modified to clearly define when purging of distribution lines is required prior to abandonment. An outside consultant with expertise in this area of risk performed an analytical study and determined when the volume of gas is so small that there is no potential hazard per 192.727(b). The results of this study, as indicated in the above issue, determined that pipe segments with diameters 1-inch and less that are a maximum of 100 feet long do not present a potential hazard. All other distribution pipelines to be abandoned that do not meet these criteria will be purged. Gas Standard 184.0085 now specifies the purging requirements as copied below:

4.1.5 Purging Requirements for Abandoned Distribution Lines: (See Table 1)

Purging Requirements for Abandoned Distribution Lines		
Nominal Diameter	100 ft. in Length or	Greater than 100 ft. in
≤ 1” (less than or equal to	Purging Not Required	Yes*
> 1” (Greater than 1”)	Yes*	Yes*

TABLE 1

*Purging shall be in accordance with SoCalGas Gas Standard 182.0160 Purging Pipelines and Components.

Attachment 3
Response to Concerns and Recommendations

SoCalGas Gas Standard 223.0345 Pressure Relief/Pressure Limiting Devices, Testing/Inspection, Section 13.2.1 requires SoCalGas employees to take steps without delay to adjust, repair, replace or install additional devices as appropriate if a relieving device or signaling device tests indicate deviations that are unsafe. SED recommends that SoCalGas review and revise its Gas Standard 223.0345 to use manufacturer's recommended tolerance for the pressure relief and pressure limiting devices and address "unsafe deviation".

Response:

SoCalGas will accept SED's recommendation on revising Gas Standard 223.0345 Section 13.2.1 to use manufacturer's recommended tolerance for positive shut off on pressure relief and signaling devices to address and clarify "Unsafe deviation". Typical manufacturer tolerance for positive shut off on relief device is to be within 10% of set pressure. This tolerance level will be incorporated into Section 13.2.1 of Gas Standard 223.0345.

Attachment 4
Response to Concerns and Recommendations

SoCalGas Gas Standard 223.0215 Valve Inspection and Maintenance – Transmission Section 4.6 requires SoCalGas employees to partially operate the valve manually and/or pneumatically. Section 4.7 requires SoCalGas employees if the valve is equipped with a hydraulic actuator, to verify hydraulic fluid level (within manufacturer specified range). It appeared that SoCalGas' Gas Standard did not address all the operating modes the valves may be subjected in the field. SED recommends that SoCalGas review its valve inspection and testing procedure and apply the manufacturer's valve inspection recommendations. .

Response:

Currently valves within the scope of CFR 192.745(a) are operated using at least one operating mode in order to verify valve functionality. In order to better capture the different operating modes, Section 4.6 of Gas Standard 223.0215 will be updated to include hydraulic operation as a mode of operation. SoCalGas will review valve inspection and maintenance standard and update as required to enhance our current activities.

Attachment 5
Response to Concerns and Recommendations

SoCalGas Gas Standard 223.0130 Abandonment, Conversion and Reinstatement of Transmission Pipelines, Section 4.15 addresses the conversion of a steel transmission pipeline. Title 49 CFR Part 192, Section 192.14 Conversion to service subject to this part addresses a steel pipeline previously used in service not subject to this part qualifies for use under this part if the operator prepare and follow a written procedure to carry out Section §192.14 requirements. SED recommends that SoCalGas revise its Gas Standard 223.0130 to include all steel pipelines (transmission and distribution pipelines).

Response:

SoCalGas appreciates SED's recommendation. However, SoCalGas does not at this time anticipate converting distribution pipelines to gas service in accordance with Section 192.14. If the Company's position changes on this matter, a Gas Standard will then be written to address conversion to distribution service.

Attachment 6
Response to Concerns and Recommendations

SoCalGas Gas Standard 223.0315 Operation and Maintenance of generator Units-Transmission and Storage Operations, Section 4.2 addresses Start-Up and Section 4.5 addresses Shutting Down process for gas compressor units as required by Title 49 CFR Part 192, Section §192.605(b)(7) “*Starting, Operating and shutting down gas compressor units*”. The Document Profile Summary did not cite Section §192.605(b)(7). SED recommends that SoCalGas revise its Gas Standard 223.0315 to include the applicable regulation.

Response:

SoCalGas Gas Standard 223.0315 was revised per SED’s recommendation and published on 1/28/16.

Attachment 7
Response to Concerns and Recommendations

SoCalGas Gas Standard 223.0325 Main Centrifugal Gas Compressor Unit Operation addresses the Start-Up and Shutting Down operation. The Document Profile Summary Section did not cite §192.605(b)(6) that addresses purging before returning to service. SED recommends that SoCalGas revise its Gas Standard 223.0325 to include the applicable regulation.

Response:

SoCalGas Gas Standard 223.0325 was revised per SED's recommendation and published on 1/26/16.

Attachment 8
Response to Concerns and Recommendations

SoCalGas Gas Standard 223.0275 “Main Reciprocating Gas Compressor Unit Operation-Transmission and Storage Operations under Purpose” references Title 49 CFR Part 192, Section §192.729 but this section cited does not exist. SED recommends that SoCalGas revise its Gas Standard 223.0275 to reference the appropriate Section of Title 49 CFR Part 192.

Response:

SoCalGas Gas Standard 223.0275 was revised per SED’s recommendation and published on 1/25/16.