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April 7, 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 a G.O. 112 Inspection of Southern California Gas Company's (SoCalGas) and San Diego Gas and Electric Company's (SDG&E) Control Room Management Program (CRM) on April 25-28, 2016.

SED staff made one recommendation and had one concern during the course of this inspection. Attached are SoCalGas and SDG&E's written responses 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: Michelle Wei, SED/GSRB
Kan Wai Tong, SED/GSRB

ATTACHMENT

Attachment 1
SED Recommendations and Concerns

1. Issues Identified in Inspection Question D2-3 Fatigue Mitigation, Reference Title 49, Code of Federal Regulations (CFR) Part 192.605(a)

CRM Form Question D2-3 states:

Is the effectiveness of the fatigue education program reviewed at least once each calendar year, not to exceed 15 months?

Title 49 CFR Part 192.605(a) requires:

“Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response... This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year...”

SED reviewed Sempra’s documentation pertaining to their annual review and documentation of the results. SED has no concern with the review period, since Sempra is currently following the regulation, but SED recommends that Sempra add an “Evaluation of Effectiveness” section to the review document. SED recommends that Sempra document the review process and their conclusions regarding the program’s effectiveness in a better manner.

RESPONSE:

SoCalGas and SDG&E agree with the SED’s recommendation and have made the following addition to page 6 of Control Room Mitigation Procedure and Practices:

“Controllers/Supervisors/Dispatchers receive a survey after annual fatigue mitigation training rating the effectiveness of the training. The results are entered into a matrix that is reviewed annually, not to exceed 15 months by the Gas Control Advisor. The Gas Control Advisor will also conduct an annual review and analysis of fatigue related absences to identify any potential deficiencies in the fatigue education program. The education program will be revised accordingly.”

2. Issues Identified in Inspection Question J1-1 Documentation

CRM Form Question J1-1 states:

Does the operator have and implement records management procedures that are adequate to assure records sufficient to demonstrate compliance with the CRM rule?

During record review, SED discovered and notified the operator that they had a missing shift change form in their supervisor records. Sempra uses the shift change forms to document the “handshake” between the outgoing and incoming controllers to ensure that all information that needs to be passed on is communicated. Sempra was able to demonstrate via other records that the handshake did occur at that particular shift turnover. However, Sempra’s procedure specifies that these documents will be retained for one year. Although Sempra was able to demonstrate compliance, they failed to produce the shift change form for SED. SED is concerned about the loss of documentation and requests that Sempra review its program to avoid reoccurrence of similar mistakes.

RESPONSE:

SoCalGas and SDG&E conducted Controller/Supervisor/Dispatcher refresher training to verify that the control room employees understand the shift change process and documentation. SoCalGas and SDG&E are currently reviewing their program and developing process improvements to address this concern. Improvements may include, but are not limited to, additional digital logging of the shift change, and centralized electronic shift change systems.