

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 9, 2017

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

GI-2016-04-SEM40-10

Subject: General Order (G.O.) 112¹ Inspection of Southern California Gas Company's and San Diego Gas and Electric Company's Control Room Management Program

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112¹ Inspection of Southern California Gas Company's and San Diego Gas and Electric Company's Control Room Management Program (CRM) on April 25-28, 2016. The two companies are referred to as Sempra Energy Utilities (Sempra).

SED used the Federal Pipeline and Hazardous Materials Safety Administration (PHMSA) CRM Form 03-01-2012 as a reference guideline to conduct the audit. SED staff made one recommendation and had one concern during the course of this inspection, which are 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 SCG. If you have any questions, please contact Michelle Wei, at (213) 620-2780 or by email: miw@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

CC: Michelle Wei, SED/GSRB
Troy Bauer, 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
2016 Control Room Management Inspection
April 25-28, 2016

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.

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.