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July 27, 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 General Order 112 Inspection and CA Public Utilities Code Section 950, 955, 956, 956.5 of Southern California Gas Company's (SCG) Emergency Management Program from November 7 - 10, 2016. The inspection included a review of emergency management procedures and a sample of 2015 records of distribution and transmission systems.

SED staff identified two possible violations and one areas of concern. Attached are SoCalGas written responses.

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

Sincerely,

Troy A. Bauer 

CC:  
Kelly Dolcini, SED  
Terence Eng, SED

ATTACHMENT

## SUMMARY OF INSPECTION FINDINGS

### **I. Probable Violations**

#### **1. TITLE 49 CFR 192.615 EMERGENCY PLANS STATES:**

- i. “(c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to: (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency; (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency; (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.”*
- a. Police:*
  - i. SCG Procedure “04.020-N -Police & Sheriff Departments” and “04.020-OC - Police & Sheriff Departments – Non-Emergency Contact Numbers” contain law enforcement contact listings for SCG’s service territory. SCG regions are organized into operational districts, with each district listing multiple law enforcement agencies at the local, county and state level as possible responding agencies. For example, the Azusa District lists ten local police departments and one county sheriff department as contact agencies. In addition, the California Highway Patrol can also respond to an emergency in the district. SCG provided SED with 2015 liaising records for the 2<sup>nd</sup> Annual Lunch & Learn event held on September 17, 2015 in Anaheim, CA. SED reviewed these records and determined that SCG established liaison with some of the law enforcement agencies in its service territory. The records provided did not demonstrate that SCG liaised with all law enforcement agencies listed in *SCG Procedure 04.020-N and 04.020-OC*. SCG is therefore in violation of Title 49 CFR 192.615 (c)(1) through (c)(4).*
- b. Other Public Officials*
  - i. SCG explained to SED that it uses a third-party vendor who handles public awareness messaging to establish and maintain liaison with other public officials by emailing brochures to public officials. SCG failed to demonstrate it met the requirements of Title 49 CFR 192.615 (c)(1) and (c)(4). Specifically, the email process and documentation failed to demonstrate how SCG learns the responsibility and resources of each government organization that may respond to a gas pipeline emergency and demonstrate that SCG plans how the operator and officials can engage in mutual assistance to minimize hazards to life and property. SCG is therefore in violation of Title 49 CFR 192.615 (c)(1) and (c)(4).*

#### **SoCalGas Response:**

*1.a. & 1.b. SoCalGas acknowledges CPUC finding.*

#### **Corrective Action:**

*SoCalGas has initiated a comprehensive review and enhancement initiative in 2017 of its existing first responder outreach program to incorporate outreach to law enforcement agencies and other public officials to enhance compliance with Title 49 CFR 192.615 (c)(1) through (c)(4). As part of this ongoing initiative, SoCalGas has implemented additional programmatic outreach plans that includes the assignment of additional resources and outreach activities throughout the SoCalGas service territory.*

**2. TITLE 49 CFR §192.616 STATES IN PART:**

*“(b) The operator's program must follow the general program recommendations of API RP 1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.”*

API Recommended Practice 1162, First Edition, December 2003, Section 2.3.2  
Emergency Responder Liaison Activities (49 CFR Parts 192.615 and 195.402) states:

*“These regulations require that operators establish and maintain liaison with fire, police and other appropriate public officials and coordinate with them on emergency exercises or drills and actual responses during emergency.”*

SCG's service territory is organized into two regions - the Northwest and Southeast Region. The Northwest Region extends approximately from Visalia to San Pedro and from San Luis Obispo to Glendale/Lancaster and is broken up into 8 areas. The Southeast Region extends approximately from Pasadena to El Centro and from Downey to Blythe and is broken into 7 areas. Each area has three to four operational districts. SCG's service territory also includes transmission regions such as North Desert Transmission which includes assets in the Needles and Victorville areas.

The emergency exercise and tabletop exercise documentation reviewed by SED indicated that SCG held an annual functional exercise on 9/16/2015 and the joint tabletop exercise with SDG&E on 6/29/2015. These exercises included participation from Los Angeles City Fire, Los Angeles County Fire, Joint Regional Intelligence Center and the Federal Bureau of Investigations for the annual functional exercise and San Diego County Office of Emergency Services for the joint tabletop exercise.

The documentation reviewed by SED did not demonstrate that SCG coordinated with fire, police and other appropriate public officials on emergency exercises or drills throughout its service territory. SCG is therefore in violation of Title 49 CFR §192.616 (b).

**SoCalGas Response:**

*SoCalGas acknowledges CPUC area of concern.*

**Corrective Action:**

*SoCalGas has initiated a comprehensive review of its existing program to expand emergency exercises/table top to local fire, police, and appropriate public officials (as reference to question 1 and 2). As part of the re-evaluation of the program, SoCalGas has taken into consideration the frequency of the exercises/table top as part of this program enhancement.*

**3. Areas of Concern (AOCs):**

**AOC 1**

SED recommends that SCG establish a frequency to perform emergency exercises or tabletops in each of its 15 areas and coordinate with local fire, police and appropriate public officials on these exercises or tabletops.

**SoCalGas Response:**

*SoCalGas acknowledges CPUC area of concern.*

**Corrective Action:**

*SoCalGas will re-evaluate the existing program to expand emergency exercises/table top to local fire, police, and appropriate public officials (as reference to question 1 and 2). As part of the re-evaluation of the program, SoCalGas will also take into consideration the frequency of the exercises/table top when enhancing the program.*