

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 26, 2017

GI-2016-06-SEM-40-04

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

SUBJECT: General Order 112 Inspection of Southern California Gas Company Emergency Management Program

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112¹ and CA Public Utilities Code Sections 950, 955, 956, 956.5 inspection of Southern California Gas Company (SCG) from November 7 - 10, 2016. The inspection included review of emergency management procedures and a sample of 2015 records for distribution and transmission systems.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter.

Please provide a written response indicating the measures taken by SCG to address the probable violations and the areas of concern and recommendations within 30 days from the date of this letter.

If you have any questions, please contact Alin Podoreanu at (916) 928-2552 or by email at alin.podoreanu@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: Troy Bauer, Pipeline Safety & Compliance
Nadia Hang, Pipeline Safety & Compliance
Kelly Dolcini, SED
Terence Eng, SED

¹ General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 15-06-044.

SUMMARY OF INSPECTION FINDINGS

I. Probable Violations

1. Title 49 CFR 192.615 Emergency Plans states:

“(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

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 2nd 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

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).

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).

II. Areas of Concern and Recommendations (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.