

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 27, 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-2016-12-SEM40-06

Subject: General Order (G.O.) 112¹ Compliance Inspection of Southern California Gas Company's Anti-Drug and Alcohol Misuse Prevention Programs

Dear Mr. Cho:

The Safety Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112¹ audit of Southern California Gas Company's (SCG) Anti-Drug and Alcohol Misuse Prevention Programs on December 5-8, 2016. The audit included a review of the SCG's records from calendar years 2013 to 2015. In addition, SED staff inspected three contractor collection sites and observed specimen collections at SCG's Downey, San Dimas, and Saticoy bases.

SED staff made one recommendation during the course of this inspection, which is 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 SCG Anti-Drug and Alcohol Misuse Prevention Program Inspection
December 5-8, 2016

SED Recommendations

During record review, SED noted three instances where the Substance Abuse Professional's (SAP) recommendations for a follow up drug testing schedule were not followed. Typically, if the employee is not terminated after a positive drug or alcohol test, they will undergo some kind of treatment program. After successful completion of the treatment program, if the SAP determines that they are safe to return to work, then the SAP will recommend a schedule for the employee's follow up testing.

In the cases identified, the schedules were not followed due to an administrative error. An SCG employee scheduled the follow up tests with the intent that the employee being tested could not determine a pattern for his/her follow up tests, which led to the employees being tested less frequently than recommended. The three cases still met the requirements of 49 CFR 199.105(f) which states that a minimum of six follow up tests are to be conducted in the first 12 months following the covered employee's return to duty. While unpredictability is an important factor in drug testing, it is also important that the employee have a sufficient number of follow up tests. Therefore, SED recommends that SCG follow the SAP's testing recommendations unless they have a compelling reason to do otherwise.