



A  Sempra Energy utility



A  Sempra Energy utility®

Troy A. Bauer
*Pipeline Safety and Compliance
Manager*
555 W. Fifth Street, MLGT-11A6
Los Angeles, CA 90013
Phone: 909-376-7208

September 7, 2018

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

Re: November 2017 and March 2018 Construction Safety Assurance Inspections
of SoCalGas and SDG&E's PSEP

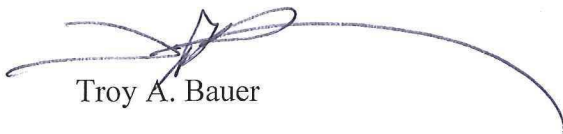
Dear Mr. Bruno:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order (G.O.) 112-F Construction Safety Assurance Inspections of Southern California Gas Company's (SoCalGas) and San Diego Gas and Electric Company's (SDG&E) Pipeline Safety Enhancement Plan (PSEP). From November 13 through 17, 2017, SED's staff reviewed SoCalGas and SDG&E's construction records for the PSEP projects that have been completed. In addition, from March 19 through 23, 2018, SED's staff conducted material traceability records review and field verification of SoCalGas and SDG&E's PSEP construction projects.

SED's staff made one recommendation and requested a written response to that recommendation within thirty days. Attached are SoCalGas and SDG&E's 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: Ha Nguyen, SED/GSRB
Matthewson Epuna, SED/GSRB
Kelly Dolcini, SED/GSRB

ATTACHMENTS

Summary of Inspection Findings
Pipeline Safety Enhancement Program Inspection
November 13-17, 2017 and March 19-23, 2018

SED's Recommendation

SED reviewed construction records of completed PSEP projects and field verification of selected projects to validate if Sempra has conducted Quality Assurance (QA) and Quality Control (QC) monitoring and inspections as outlined in its PSEP Standard Procedures SP-1101 (Quality Plan for PSEP). SED recommends that Sempra conduct and document all unannounced field inspections of all its PSEP construction projects in order to verify that all construction activities and processes are performed in accordance with the spirit and letters of the QA/QC Plan.

RESPONSE:

SoCalGas and SDG&E support SED's recommendation to conduct and document unannounced field inspections in addition to the announced field inspections they already conduct. The Gas Compliance Quality Management (GCQM) will select, prioritize and conduct unannounced field quality assessments based on the PSEP Construction 30-Day Look Ahead Schedule. GCQM will select projects that are actively in construction and have daily observable covered tasks as listed in the construction activities column in the PSEP Construction 30-Day Look Ahead Schedule. Unannounced PSEP field inspections will be conducted without prior notice given to the respective Construction Manager. Projects will be assessed using the standardized PSEP Field Quality Assessment template which is documented digitally. PSEP Standard Procedures SP-1101 will be revised to provide for this procedure.