

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



GI-2018-08-SEM-40-08

October 2, 2018

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

**SUBJECT:** General Order 112-F Inspection of the Southern California Gas Company's and San Diego Gas and Electric Company's Gas Transmission Pipeline Integrity Management Program (TIMP).

Dear Mr. Cho:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Paul Penney, Mahmoud Intably and Ha Nguyen conducted a General Order 112-F inspection of SEMPRA's Transmission Integrity Management Program (TIMP) on August 6-10, 2018. The inspection included a review of procedures and records related to the TIMP protocols D and G.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter. The Summary reflects only those procedures and records that SED inspected during the inspection.

Please provide a written response within 30 days of your receipt of this letter indicating measures taken by Sempra to address the findings noted in the Summary. This letter can be considered the audit letter and close out letter. As discussed below, SEMPRA has already added the appropriate language the ECDA plan.

If you have any questions, please call Paul Penney at (415) 703-1817.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno, Program Manager  
Safety and Enforcement Division

cc: Mamoud Intably, SED  
Ha Nguyen, SED  
Nadia Hang, Sempra  
Matt Epuna, SED  
Kan-Wai Tong, SED  
Kelly Dolcini, SED

## Summary of Inspection Findings

### Violation Identified in Protocol Area D: DA Plan

#### Protocol D.02.b. states:

**D.02.c.** Verify that the operator complies with all requirements for appropriate indirect inspection **tools selection:** [NACE SP0502-2008, Section 3.4, NACE SP0502-2008, Table 2, and 192.925(b)(1)(ii)]

- i. A minimum of 2 complementary tools must be selected such that the strengths of one tool compensate for the limitations of the other tool. (Note: The operator must consider whether more than two indirect inspection tools are needed to reliably detect corrosion activity.)
- ii. Tools are able to assess and reliably detect corrosion activity and/or coating holidays.
- iii. Verify that the operator documents the basis for its tool selection.
- iv. If the operator utilizes an indirect inspection method not listed in NACE SP0502-2008, Appendix A, verify that the operator justifies and documents the method's applicability, validation basis, equipment used, application procedure, and utilization of data. [§192.925(b)(1)(ii)]

#### Issue Identified

**Violation:** For Roman numeral iv above, the language in Section 3.9.2 references Section 7 of the exception process; the language is general in nature. The language in SEMPRA's plan needs to incorporate the specific language in 192.925(b)(1)(ii). This language states:

*(ii) The basis on which an operator selects at least two different, but complementary indirect assessment tools to assess each ECDA Region. If an operator utilizes an indirect inspection method that is not discussed in Appendix A of NACE SP0502, the operator must demonstrate the applicability, validation basis, equipment used, application procedure, and utilization of data for the inspection method.*

During the audit, SEMPRA personnel revised the ECDA plan, and incorporated this language. Please provide a copy of SEMPRA's final revision of the language.