

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 11, 2019

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

GI-2019-07-SEM40-10

Subject: General Order (G.O.) 112-F Inspection of Southern California Gas Company's and San Diego Gas and Electric Company's Control Room Management Program

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F Inspection of Southern California Gas Company's (SCG) and San Diego Gas and Electric Company's (SDG&E) Control Room Management Program (CRM) on August 23-25, 2019 and inspected related records for calendar years 2016-2018. Herein, the two companies are referred to jointly as "the operator". SED used the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety's "Inspection Assistant Form" as a reference guide to conduct the inspection.

SED's staff noted two areas of concerns which are 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 and SDG&E.

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 "Dennis Lee". The signature is fluid and cursive, with the first name "Dennis" and last name "Lee" clearly distinguishable.

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

CC: Michelle Wei, SED/GSRB
Troy Bauer, SCG
Kan Wai Tong, SED/GSRB
Claudia Almengor, SED/GSRB
Matthewson Epuna, SED/GSRB

Summary of Inspection Findings 2019 Control Room Management Inspection

Dates of Inspection: August 23-25, 2019

Operator: SCG and SDG&E

Operator IDs: 18484 (primary) 18112

Inspection Systems: Control Room Management Program

Assets (Unit IDs): GI-2019-07-SEM-40-10 (88388 88389)

System Type: GT

Inspection Name: Sempra CRM

Lead Inspector: Michelle Wei

Operator Representative: Alex Hughes, Pipeline Safety and Compliance

Unsatisfactory Results

No Preliminary Findings.

Concerns

A. CRM, SCADA, and Leak Detection : Fatigue Management (CR.CRMFM)

Question Text Are there scheduled periods of time-off that are at least one hour longer than 8 hours plus commute time or is there a documented technical basis to show that shift lengths and schedule rotations are adequate to provide controllers off-duty time sufficient to achieve 8 hours of continuous sleep?

References 192.631(d)(1)

Assets Covered GI-2019-07-SEM-40-10 (Sempra CRM)

Issue Summary One controller has a 1.5-2 hour commute which would not provide him 8 hours of continuous sleep plus some personal time as recommended in this section. SED discussed this issue with SCG and SDG&E and was informed that the controller has been trained and is well-aware of his limits and has used available resources in the past in order to prevent fatigue. SED has discussed this issue with PHMSA and agreed that this controller has the knowledge to balance the long commute and long work hours. However, SED recommends that SCG and SDG&E should make two changes to the control room practices. First, going forward, SCG and SDG&E should require that a newly hired controller does not live more than an hour away from the control room. Second, and more importantly, SCG and SDG&E should require controllers to document fatigue countermeasures when they are used. This is not to say that every time a controller stands up or gets coffee they need to record it, but any time they are using any of the fatigue countermeasures to actively combat sleep they should make a record of when and what they did. In the future this will allow the operator to determine if their fatigue mitigation training is effective and being implemented. Also to evaluate specific cases like these to see if the long commute has an effect on the controller's ability to perform his tasks adequately.

B. CRM, SCADA, and Leak Detection : Training (CR.CRMTRAIN)

Question Text Do records indicate that training exercises were adequate and involved at least one qualified controller?

References 192.631(h)(6)

Assets Covered GI-2019-07-SEM-40-10 (Semptra CRM)

Issue Summary Team training exercises are intended to have a focus on practicing effective communication while in a stressful situation. These exercises are to include all parties that would reasonably be expected to collaborate with control room personnel during an abnormal operating condition. SED has reviewed the training records provided by the operator and believes that it addresses emergency response, but do not sufficiently address exercise or effective communication strategies. Please provide response how the control room group intends to address the requirements of this code section going forward.