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August 30, 2017

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

Dear Mr. Bruno:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112, Operation and Maintenance Inspection of Sempra Energy Utilities (Sempra Utilities) Producer Injection Sites from June 5 – 9 and June 12 – 16, 2017:

The inspection included a review of the Producer Injection site's Gas Chromatograph (GC) Monitor – Calibration/Inspection, Hydrogen Sulfide (H₂S) Monitor - Calibration/Inspection, Oxygen Monitor – Calibration/Inspection, Odorant Injector Inspection, Shut-in (Latching and Unlatching) records for calendar years 2013 thru 2016 and field inspections of the facilities within the selected Producer Sites. SED staff also reviewed the Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff identified and noted one area of concern. 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:
Durga Shrestha, SED/GSRB
Kelly Dolcini, SED/GSRB
Kan Wai Tong, SED/GSRB

**Summary of Inspection Findings
2017 Sempra's Transmission Producer Sites Inspection
June 05 - 16, 2017**

Concerns, Observations and Recommendation

During field inspection, SED noted that the Districts did not maintain Identification (ID) Drawings of its assets at "Producer Sites". Typically, Sempra Utilities will have an ID Drawing at regulator station to help their employees identify the different assets present at the site. Sempra Utilities stated that ID drawings were not required since the locations were not regulator stations and if there was any confusion about which assets to operate their employees would contact their supervisor. Due to the complex piping configurations at producer sites, SED recommends that Sempra Utilities generate and maintain an updated ID Drawings of its assets at producer sites to facilitate efficient producer site inspection.

RESPONSE:

SoCalGas and SDG&E agree with SED's recommendations to update Identification Drawings for its producer sites. SoCalGas and SDG&E are in the process of updating the drawings for each producer site. The drawings are being updated as work is completed for maintenance or regulatory reasons.