

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 10, 2019

GI-2019-03-SCE-70-03-05-07-09

Mr. Colin E. Cushnie, Vice President
Energy Procurement and Management
Southern California Edison
2244 Walnut Grove Ave,
Rosemead, CA 91770

SUBJECT: SED's Closure Letter for General Order (G.O.) 112-F O&M Comprehensive, OQ, PAP and DIMP Inspection of Southern California Edison's Petroleum Gas Pipelines in Catalina Island

Dear Mr. Cushnie:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Southern California Edison's (SCE) response letter dated June 20, 2019 that addressed two (2) violations and fourteen (14) recommendations identified during General Order 112-F inspection of SCE's Petroleum Gas Pipeline Operation and Maintenance (O & M) Plan, Operator Qualification (OQ) Program, Public Awareness Program (PAP), Distribution Integrity Management Program (DIMP) inspections conducted on March 18 - 22, 2019.

Attached is a summary of SED's inspection findings, SCE's responses to SED's findings, and SED's evaluation of SCE's responses to the findings.

This letter serves as the official closure of the 2019 **O&M Comprehensive, OQ, PAP and DIMP** Inspections of SCE's Petroleum Gas Pipeline in Catalina Island. Any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this inspection. If you have questions, please contact Durga Shrestha, at (213) 576-5763 or by e-mail at ds3@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mahmoud Intably".

Mahmoud (Steve) Intably, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

cc: Claudia Almengor, SED
Kan-Wai Tong, SED (Kwt@cpuc.ca.gov)
Dennis Lee, SED (Dml@cpuc.ca.gov)

**Summary of Inspection Findings
2019 SCE's Petroleum Gas Pipeline Inspection
March 18 – March 22, 2019**

I. SED Identified Probable Violations

1. Title 49 Code of Federal Regulation (CFR), Part 192, §192.605 Procedural manual for operations, maintenance, and emergencies

§192.605(a) General states in part:

“(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.”

Title 49 CFR Part 192, §192.747 Valve maintenance: Distribution systems

§192.747(a) Valve maintenance: Distribution systems states in part:

“(a) Each valve, the use of which may be necessary for the safe operation of a distribution system, must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year.”

General Order No. 112-F, Subpart C, §143.3 Valve Maintenance states in part:

“Each valve, the use of which may be necessary for the safe operation of a distribution system, must be inspected, serviced, lubricated (where required) and partially operated at intervals not exceeding 15 months, but at least once each calendar year.”

SCE's Gas Standard 421 did not require a PE valve that is necessary for the safe operation of a distribution system to be inspected, serviced, and partially operated.

Valve No.	Location
80	Bird Park Housing parking lot (Plastic)
81	South of valve #80 (Plastic)
82	South of valve #81 (Plastic)
83	South of valve #81 (Plastic)
89	Triana Spare Main - CLOSED (Plastic)
90	Triana End of Main - charged (Plastic)
91	Triana End of Spare Main (Plastic)
92	Triana, feeds Buildings 4 & 5 (Plastic)
93	Triana, feeds Buildings 1 & 3 (Plastic)
94	Triana, feeds Building 2 (Plastic)
97	Wrigley Drive, South of Clemente (Plastic)

SCE has a total of 11 PE valves (listed in the table above) that are required to be inspected in accordance with SCE's Gas Standard 421. During the field inspection of SCE's PE valves that are necessary for the safe operation of the distribution system, SED staff observed that SCE's employees failed to check, service, and partially operate the PE valve # 93 to ensure that

it is operable. Therefore, SED found SCE in violation of G.O. 112-F, Section 143.3, Reference Title 49 CFR, Part 192, §192.605 (a) and §192.747(a).

SCE's Response:

SCE has updated Standard and Procedure (SP) 421 – Valve Inspection to comply with the requirements of General Order No. 112-F, Subpart C, §143.3 Valve Maintenance. The 11 plastic valves identified by the SED have been inspected, serviced and partially operated per GO 112-F, Subpart C, § 143.3 Valve Maintenance.
(Attachment B – *SP421 Valve Inspection Reports.pdf*, *SP-421 Valve inspection 2019.pdf*)

SED's Conclusion:

SED has reviewed SCE's response. SED also reviewed and accepted the corrective measures SCE has taken to address its inspection deficiency. Therefore, SED opted not to impose a fine or penalty since SCE has taken the appropriate remedial actions. However, SED may verify the implementation of the corrective actions in future inspections.

2. Title 49 CFR Part 192, §192.707 Line markers for mains and transmission lines.

§192.707(c) Pipelines above ground states in part:

(c) Pipelines above ground. Line markers must be placed and maintained along each section of a main and transmission line that is located above ground in an area accessible to the public.

§192.707(d) Marker Warning states in part:

(d) Marker warning. The following must be written legibly on a background of sharply contrasting color on each line marker:

(1) The word "Warning," "Caution," or "Danger" followed by the words "Gas (or name of gas transported) Pipeline" all of which, except for markers in heavily developed urban areas, must be in letters at least 1 inch (25 millimeters) high with ¼ inch (6.4 millimeters) stroke.

(2) The name of the operator and telephone number (including area code) where the operator can be reached at all times.

During the field inspection of SCE's aboveground pipelines, SED observed a section of main line located between Upper East Terrace Road and Middle East Terrace Road, in an area accessible to the public, did not have a line marker. Therefore, SCE is in violation of G.O. 112-F, Reference Title 49 CFR Part 192, §192.707(c).

SCE's Response:

SCE has buried the gas main that was exposed during an adjacent Avalon City saltwater system leak. SCE covered our exposed gas main and placed temporary line markers using flags, barricades, barricade tape and pipeline markers until final restoration was made by the City of Avalon on June 12, 2019. SCE will place permanent pipeline markers at the street crossings between Wrigley Road to Lower East Terrace Road and underground pipeline markers on the

hillside along the route of the pipeline. The temporary barricades, pipe markers and barricade tape will remain in place until the permanent signage is installed.
(Attachment C – SP-413A Patrol Report – Support Pics.pdf)

SED's Conclusion:

SED has reviewed SCE's response and accepts SCE's proposed and implemented corrective actions to address the issues. SED also instructs SCE to inform SED when SCE completes the proposed corrective actions. SED may verify the implementation of the corrective actions in future inspections.

II. Concerns

1. Title 49 CFR, Part 192, §192.605 (a) Procedural manual for operations, maintenance, and emergencies.

§192.605(a) General states in part:

"(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."

a) SCE's Gas Standard SP 421, Section 4.4 states, in part:

"Verify the valve type and manufacture."

During the record review, SED staff found that SCE's Valve Inspection Report (VIR) did not include the valve's material information. In addition, some entries in the report were missing/left blank. SED recommends that SCE review/revise its VIR to address SED's concern and to ensure that its employees complete the VIR accordingly.

SCE's Response:

SCE has updated SP 421 – Valve Inspection Maintenance and Repair, Section 4.4 to require documentation of the type of valve, either steel or plastic and ball or plug and the manufacture name if known or accessible. This update will be incorporated in our July 2019 SP Review with Catalina gas personnel. (Attachment B – SP-421 Valve inspection 2019.pdf)

SED's Conclusion:

SED has reviewed SCE's response. SED also reviewed and accepted the corrective measures SCE has taken. However, SED may review the implementation of these stated actions during future inspections.

b) SCE's Gas Standard SP 421 Section 3 states, in part:

"Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve or valves, for isolating line sections."

SCE's Gas Standard did not clearly define "inoperable" valve. SED recommends that SCE review/revise its procedure to address SED's concern.

SCE's Response:

SCE has added in SP 421, Section 2.0 Key Definitions "Inoperable Valve" as a valve that cannot be exercised successfully by two technicians. SCE also included the definition of an "Inoperable Valve" in SP 421, Section 4.23. This update will be incorporated in our July 2019 SP Review with Catalina gas personnel. (Attachment B – *SP-421 Valve inspection 2019.pdf*)

SED's Conclusion:

SED has reviewed SCE's response. SED also reviewed and accepted the corrective measures SCE has taken. However, SED may review the implementation of these stated actions during future inspections.

- c) During the field inspection, SED observed valve casing for valve No. 23, was filled with sand/dirt. SCE's Gas Standard did not include an instruction/steps to address the sand/dirt in the valve casing prior to inspect, service, and partially operate the valve. SED recommends that SCE review/revise its procedure to address SED's concern.

SCE's Response:

SCE has included in SP 421, Section 4.2 to include steps to remove sand/dirt from the valve casing using cleanout tongs, blowing out box with compressor, or vacuum. This update will be incorporated in our July 2019 SP Review with Catalina gas personnel. (Attachment B – *SP-421 Valve Inspection 2019.pdf*)

SED's Conclusion:

SED has reviewed SCE's response. SED also reviewed and accepted the corrective measures SCE has taken. However, SED may review the implementation of these stated actions during future inspections.

- d) SCE's Gas Standard SP 405 Section 4.1.8.1.1 states in part:

"Repair and/or replacement records for mains and services shall be retained for the life of the facility."

SCE's Gas Standard SP 405 Section 4.1.8.1.3 states in part:

"Catalina Gas Operations will retain completed Form 431C for 6 years plus the current year."

SCE's Form 431C contains information related to pipeline materials and repairs. SED recommends that SCE review/revise its procedure to ensure Form 431C retained for as long as facility is in active service.

SCE's Response:

SCE has updated SP-405, Sections 4.1.8.1.3 to reference SP-431 for the record retention schedule of Form 431-C, which has been updated to reflect the "Life of Facility". This update will be incorporated in our July 2019 SP Review with Catalina gas personnel. (Attachment D – *SP-405 Notifying Reporting and Responding 2019.pdf; Form 431C.pdf*)

SED's Conclusion:

SED has reviewed SCE's response. SED also reviewed and accepted the corrective measures SCE has taken. However, SED may review the implementation of this stated action during future inspections.

2. Title 49 CFR, Part 192, §192.605 Procedure manual for operations, maintenance, and emergency

§192.605(b)(3) Maintenance and normal operations states in part:

"Making construction records, maps, and operating history available to appropriate operating personnel"

During the record review, SED staff found that SCE's Gas Distribution System's map did not include the location of valves numbered 95, 96, & 97. In addition, valve number 46 was shown at two different locations on the Gas Distribution System's map. SED recommends that SCE review/revise its Gas Distribution System's map to address SED's concern.

SCE's Response:

SCE has updated the Gas Distribution System Map to include valves 95, 96 and 97. Valve 46 was determined to be a duplicate valve and was removed from the map. Updated maps have been distributed to the Catalina gas personnel. (Attachment E – *Catalina Gas Distribution Map.pdf*)

SED's Conclusion:

SED reviewed the updated map and accepted the corrective measures SCE has taken. However, SED may review the implementation of these stated actions during future inspections.

Post-Inspection Written Preliminary Findings (DIMP, OQ, and PAP)

Unsatisfactory Results

No Preliminary Findings.

Concerns

Records: Operations and Maintenance (PRR.OM)

1. Question: Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?
- Text: commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?
- References: 192.616(g) (API RP 1162 Section 2.3.1)
- Assets Covered: Catalina Island (87037 (70))
- Issue Summary: During the records review, SED staff found that SCE did not have supporting documents showing that Spanish language is commonly understood by a significant number of non-English speaking population in its operation's area. SED recommends that SCE conduct a census/survey to determine other languages commonly understood by a significant number of non-English speaking population in its operation's area and provide its customers with a PAP brochure written in that language(s).

SCE's Response:

SCE updated Public Awareness Program, Section 5.4 – Public Awareness Messages to include that Spanish is the significant non-English population of Avalon, CA. SCE obtained this information from the United States Census Bureau, 2010 report and will continue to use them as their source for census data. The next Census Report is due out in 2020 and will be reviewed for any changes. This data will be included as an attachment to the Public Awareness Program. (*Attachment F – PAP Section 5.4 Update.pdf; Avalon CA Census.html*)

SED's Conclusion:

SED has reviewed SCE's response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.

2. Question: Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?
- Text: petroleum gas system operator has met the requirements of Part 192?
- References: 192.616(j) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)
- Assets Covered: Catalina Island (87037 (70))

Issue Summary SCE's Public Awareness Program Manual, Section 9.1, Assess Program Implementation states in part:

"SCE Catalina Gas Compliance Manager will conduct an annual internal self-assessment using the template from RP 1162 (Annex C)

API RP 1162 Section 2.7 (Step 12) requires the implementation of continuous improvement. Program changes based on results of an evaluation to improve effectiveness should be implemented and documented.

During the records review, SED staff found that the annual self-assessment of PAP did not have a formal written report showing the implementation of continuous improvement of PAP. SED recommends that SCE review/revise its PAP to address SED concern.

SCE's Response:

SCE completed an internal self-assessment for year 2018 on April 3, 2019 using RP 1162, Annex C (Annual Internal Self-Assessment) to document the annual program self-assessment and will maintain this form to affirm completion of this requirement.
(Attachment G – Annex C - 2018 Annual Internal Self-Assessment.pdf)

SED's Conclusion:

SED has reviewed SCE's response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.

Topical Content (OQ, PA, CRM): Public Awareness Program Effectiveness (MISCTOPICS.PUBAWARE)

3. Question Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?
Text
References 192.616(e) (192.616(f))
Assets Covered Catalina Island (87037 (70))
Issue Summary §192.616(e) states in part:

"The program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations"

SCE's Public Awareness Program Manual, Section 5.1 requires information on pipeline facility locations to be developed and delivered to affected municipalities, businesses, and residents.

During the records review, SED staff found that SCE did not provide the supporting document showing that information on pipeline facility locations

were shared/delivered to affected school districts. SED recommends that SCE review/revise its PAP to address SED concern.

SCE's Response:

SCE has added School Districts to the list of Public Awareness Stakeholders Audience in Section 5.1 of the Public Awareness Program.

SCE has invited the school district in the past and will continue to include the school district to the Annual Gas Safety Tabletop/Drill exercise where the SCE Emergency Response Plan is reviewed. This review includes a map of the Catalina Gas Pipeline Facility locations. (Attachment H – *PAP Section 5.1 Update.pdf*)

SED's Conclusion:

SED has reviewed SCE's response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.

(Repeated 1)

Question Text: Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

References: 192.616(g) (API RP 1162 Section 2.3.1)

Assets Covered: Catalina Island (87037 (70))

Issue Summary: During the records review, SED staff found that SCE did not have supporting documents showing that Spanish language is commonly understood by a significant number of non-English speaking population in its operation's area. SED recommends that SCE conduct a census/survey to determine other languages commonly understood by a significant number of non-English speaking population in its operation's area and provide its customers with a PAP brochure written in that language(s).

SCE's Response: Repeat of Question 1:

SCE updated Public Awareness Program, Section 5.4 – Public Awareness Messages to include that Spanish is the significant non-English population of Avalon, CA. SCE obtained this information from the United States Census Bureau, 2010 report and will continue to use them as their source for census data. The next Census Report is due out in 2020 and will be reviewed for any changes. This data will be included as an attachment to the Public Awareness Program. (Attachment F – *PAP Section 5.4 Update.pdf; Avalon CA Census.html*)

SED's Conclusion:

SED has reviewed SCE's response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.

4. Question Has an audit or review of the operator's program implementation been performed annually since the program was developed?
- Text
- References 192.616(c) (192.616(i), API RP 1162 Section 8.3)
- Assets Covered Catalina Island (87037 (70))
- Issue Summary API RP 1162 Section 8.3 requires the Operator to complete an annual audit or review of whether the program has been developed and implemented according to Recommended Practice Guidelines. Sample questions are included which the operator should use in auditing the program implementation process. One of three methodologies should be used from 1) internal working group; 2) third party; or 3) Regulatory inspections.

During the records review, SED staff found that SCE did not have the supporting document showing that PAP was reviewed and implemented in accordance with Recommended Practice Guidelines. SED recommends that SED review/revise its PAP to address SED concern.

SCE's Response:

SCE uses two of the three methodologies (internal working group and third party, Section 9.0 – Evaluation of Public Awareness Program) to conduct the annual audit of the Public Awareness Program. SCE will implement the use of RP 1162 Annex C to formally capture that the Public Awareness Program was reviewed, revised and implemented in accordance with Recommended Practice Guidelines.
(Attachment G – *Annex C - 2018 Annual Internal Self-Assessment.pdf*)

SED's Conclusion:

SED has reviewed SCE's response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.

5. Question Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?
- Text
- References 192.616(c) (192.616(i), API RP 1162 Section 8.3)
- Assets Covered Catalina Island (87037 (70))
- Issue Summary §192.616(i) states in part:

"The operator program documentation and evaluation results must be available for periodic review by appropriate regulatory agencies"

SCE's Public Awareness Program Manual, Section 9.1, Assess Program Implementation states in part:

“SCE Catalina Gas Compliance Manager will conduct an annual internal self-assessment using the template from RP 1162 (Annex C)”

API RP 1162 Section 2.7 (Step 12) requires the implementation of continuous improvement. Program changes based on results of an evaluation to improve effectiveness should be implemented and documented.

During the records review, SED staff found that the annual self-assessment of PAP did not have a formal written report showing the implementation of continuous improvement of PAP. SED recommends that SCE review/revise its PAP to address SED concern.

SCE’s Response: Repeat of Question 2:

SCE completed an internal self-assessment for year 2018 on April 3, 2019 using RP 1162, Annex C (Annual Internal Self-Assessment) to document the annual program self-assessment and will maintain this form to affirm completion of this requirement.

(Attachment G – Annex C - 2018 Annual Internal Self-Assessment.pdf)

SED’s Conclusion:

SED has reviewed SCE’s response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.

6. Question Text Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?
- References 192.616(c) (API RP 1162 Section 8.3)
- Assets Covered Catalina Island (87037 (70))
- Issue Summary API RP 1162 Section 8.3 requires the Operator to complete an annual audit or review of whether the program has been developed and implemented according to Recommended Practice Guidelines. Sample questions are included which the operator should use in auditing the program implementation process. One of three methodologies should be used from 1) internal working group; 2) third party; or 3) Regulatory inspections.

During the records review, SED staff found that SCE did not have the supporting document showing that PAP was reviewed and implemented in accordance with Recommended Practice Guidelines. SED recommends that SED review/revise its PAP to address SED concern.

SCE’s Response: Repeat of Question 4:

SCE uses two of the three methodologies (internal working group and third party, Section 9.0 – Evaluation of Public Awareness Program) to conduct the annual audit of the Public Awareness Program. SCE will implement the use of RP 1162 Annex C to formally capture that the Public Awareness Program was reviewed, revised and implemented in accordance with Recommended Practice Guidelines.

SED's Conclusion:

SED has reviewed SCE's response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.

(Repeated 1)

Question Text Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?

References 192.616(j) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)

Assets Covered Catalina Island (87037 (70))

Issue Summary SCE's Public Awareness Program Manual, Section 9.1, Assess Program Implementation states in part:

"SCE Catalina Gas Compliance Manager will conduct an annual internal self-assessment using the template from RP 1162 (Annex C)

API RP 1162 Section 2.7 (Step 12) requires the implementation of continuous improvement. Program changes based on results of an evaluation to improve effectiveness should be implemented and documented.

During the records review, SED staff found that the annual self-assessment of PAP did not have a formal written report showing the implementation of continuous improvement of PAP. SED recommends that SCE review/revise its PAP to address SED concern.

SCE's Response: Repeat of Question 2 & 5:

SCE completed an internal self-assessment for year 2018 on April 3, 2019 using RP 1162, Annex C (Annual Internal Self-Assessment) to document the annual program self-assessment and will maintain this form to affirm completion of this requirement.

(Attachment G – Annex C - 2018 Annual Internal Self-Assessment.pdf)

SED's Conclusion:

SED has reviewed SCE's response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.

Generic Questions: Generic Questions (GENERIC.GENERIC)

Question Text Generic question - please provide context in result notes.

References N/A

Assets Covered Catalina Island (87037 (70))

Issue Summary **A. Title 49 CFR, Part 192, §192.1007 What are the required elements of an integrity management plan?**

a) §192.1007(a)(1) Knowledge states in part:

“Identify the characteristics of the pipeline’s design and operations and the environmental factors that are necessary to assess the applicable threats and risks to its gas distribution pipelines”

SCE has 0.52 miles of plastic PE pipelines in its gas distribution system. SCE did not have traceable, verifiable, and complete records to identify the characteristics of the pipeline’s design, and the installation date to assess the applicable threats and risks to its gas distribution pipelines. SED recommends that SCE review/revise its Integrity Management (IM) Plan to address SED’s concern.

SCE’s Response:

In the Distribution Integrity Management Plan (DIMP), SCE references SP-414 – Petroleum Gas Mains and Service Lines, to address Aldyl-A pipe on the Catalina Gas Distribution System. SCE has updated SP-414 to require the use of Form 431-C to capture physical markings on any pipeline installed or removed.
(Attachment I – *SP-414 Pet Gas mains Service Lines 2019.pdf; Form 431-C*)

SED’s Conclusion:

SED has reviewed SCE’s response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.

b) §192.1007(a)(3) Knowledge states in part:

“Identify additional information needed and provide a plan for gaining that information over time through normal activities conducted on the pipeline (for example, design, construction, operations or maintenance activities)”.

SCE’s IM plan Chapter 3, Knowledge of the distribution system reference chapter 11, Section 11.1 - implementation plan, to gain the needed information over time through normal activities. Section 11.1-C specifies the steps needed to collect additional information to fill gap, but it did not specifically show the mechanisms or procedures to collect the missing information.

During IM Plan review, SED staff found that SCE’s IM Plan did not have the mechanism to identify the type of plastic PE used in its gas

distribution system. SCE's Form 431-C did not address the excavation damage in detail such as information about USA ticket, incorrect marking, human error, procedure related issue, training related issue, etc.

SED recommends that SCE implement a robust program to capture and address the missing data. In addition, SED recommends that SCE review/revise Form 431-C to include the additional information needed to be captured during O&M activities to identify the missing data. Furthermore, SED recommends that SCE implement QA/QC to ensure that its field personnel collect/capture the necessary data when completing Form 431-C.

SCE's Response:

SCE is creating a robust program for gathering pipeline pedigree data. SCE has updated Form 431-C to address the gaps identified by the SED during the recent audit. This will also include a new Technical Instruction document on completing the updated form and a data management process to maintain the data.

(Attachment I – *SP-414 Pet Gas mains Service Lines 2019.pdf; Form 431-C*)

SED's Conclusion:

SED has reviewed SCE's response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.

c) During IM Plan review, SED found that SCE did not have an Additional/Accelerated (A/A) Actions to address excavation damage and mitigate the threat associated with excavation damage. SED recommends that SCE review/revise its IM Plan to address SED's concern.

SCE's Response:

SCE will include more details in the DIMP to address the Additional/Accelerated Actions. SCE will include causes for excavation damage to include "Incorrect Marking", "Human Error", "Procedure Issue", "Training Issue" and "Not Following One-Call Laws" in order to better mitigate these threats. This information has also be added to the new Form 431-C. (Attachment I – *SP-414 Pet Gas mains Service Lines 2019.pdf; Form 431-C*)

SED's Conclusion:

SED has reviewed SCE's response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.

B. Title 49 CFR, Part 192, §192.805 Qualification Program

During the records review, SED found that SCE's operator Qualification (OQ) Program did not address the number of times an individual can be re-evaluated after he/she failed to pass the evaluation process. In addition, if re-evaluation is offered, SCE should require the individual to go through a "cooling off" period following a failure to pass the evaluation. SED recommends that SCE review/revise its OQ program to require individual to go through a "cooling off" period following a failure to pass the evaluation. See PHMSA FAQ OQ 2.11.

SCE's Response:

SCE has updated Section 2.6 – Evaluation Standards of the Operator Qualification Plan to include a more detailed timeline to include a "cool-off" period and number of attempts that can be made before having to complete additional retraining and performance evaluations to be eligible to be requalified. (Attachment J – *OPQ Section 2.6 Evaluation Stand*

SED's Conclusion:

SED has reviewed SCE's response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.