

June 20, 2019

Mr. Dennis Lee, PE  
Program & Project Supervisor Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

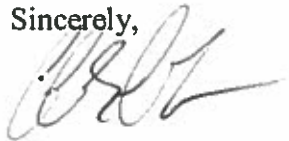
Re: GI-2019-03-SCE-70-03-05-07-09  
Southern California Edison Response to CPUC General Order 112 Inspection of  
Southern California Edison, Catalina Island's Emergency Management Program

Dear Mr. Lee:

As you are aware, on March 18-22, 2019, the California Public Utilities Commission's Safety and Enforcement Division (SED) conducted an inspection of Southern California Edison Company's (SCE) compliance with General Order (GO) 112-F relating to Catalina Island's Emergency Management Program for the years 2015-2018. This letter is response to your May 21, 2019 letter notifying SCE of the inspection result and requesting SCE's response with updates or corrective actions within 30 days of receipt of that letter. 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 of Public Awareness Program (PAP), Distribution Integrity Management Program (DIMP), and Operator Qualification (OQ) Program. SED reviewed SCE's Operation and Maintenance (O&M) Plan and conducted field inspection of pipeline facilities, which included field observation of randomly selected individuals performing covered tasks.

During the inspection, SED staff identified two probable violations, listed areas of concern, and made various recommendations. After the inspection, SCE took actions to correct or address all of these issues. Below, SCE has prepared a response to the items identified by SED as "concerns and recommendations" noted in your May 21, 2019 letter in Attachment A. In some cases, SCE has provided information of the corrective action by including the revised Standard Procedure, pictures, etc., which is found in Attachments B thru J.

Sincerely,



Colin Cushnie

cc: Jim Buerkle

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**Attachments:**

**Attachment A - *SCE Response Document.docx***  
**Attachment B – *SP 421 Valve Inspection Reports; SP-421 Valve Inspection 2019***  
**Attachment C – *SP-413A Patrol Report – Support Pics.pdf***  
**Attachment D – *SP-405 Notifying Reporting and Responding 2019.pdf; Form 431C.pdf***  
**Attachment E – *Catalina Gas Distribution Map.pdf***  
**Attachment F – *PAP Section 5.4 Update.pdf; Avalon CA Census.html***  
**Attachment G – *Annex C – 2018 Annual Internal Self-Assessment.pdf***  
**Attachment H – *PAP Section 5.1 Update.pdf***  
**Attachment I – *SP-414 Petroleum Gas Mains Service Lines; Form 431-C***  
**Attachment J – *OPQ Section 2.6 Evaluation Standards Update.pdf***