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Mr. Kenneth Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
506 Van Ness Avenue  
San Francisco, CA 94102-3298

Dear Mr. Bruno:

The staff of the Safety and Enforcement Division (SED) conducted a General Order (GO) 112-E compliance inspection of Southern California Gas Company's (SoCalGas) Basin Transmission Area facilities on February 2-6, 2015. The inspection included a review of the cathodic protection and odorant records for calendar years 2013 and 2014 and random field inspections of pipeline facilities in the Brea, Olympic, and Saticoy Transmission districts. SED also reviewed SoCalGas' Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff identified one potential violation of GO 112-E Reference Title 49 Code of Federal Regulations, Part 192 and one issue of concern, making a recommendation associated with the issue. Attached is SoCalGas' written response and corrective actions.

Please feel free to contact me at (213) 305-8660, if you have any questions or need additional information.

Sincerely,

W. Jeff Koskie  
Pipeline Safety and Compliance Manager

Attachments

Attachment 1  
Response to Inspection Observations

A. Inspection Identified a Probable Violation of Subpart M, Maintenance, G.O. 112-E,  
Title 49 CFR Part 192, §192.456(d) External Corrosion Control: Monitoring

**Title 49 CFR Part 192, Section 192.465(d) – External Corrosion Control: Monitoring**

*“Each operator shall take prompt remedial action to correct any deficiencies as indicated by the monitoring.”*

SED discovered that the Inspection Unit did not create a follow up work order to address a high casing read outside tolerances on Work Order #5147205 (point 1016-8.150-C) dated March 8, 2013. Further investigation found that this read was likely a mis-read, as the routine read a year later on February 19, 2014 indicated within tolerances. Since SCG did not promptly address the high casing read, SED found SCG in violation of Title 49 CFR Part 192, Section 192.465(d). However, SED acknowledges that the new QA/QC process instituted by SCG in 2014 would have caught this error and will likely prevent similar errors in the future.

**Response To Item A**

SoCalGas disagrees with the determination by SED. Regulatory requirements neither mandate the application of cathodic protection on casings nor require monitoring of casings.

The casing read was found to be a misread over the upper limit for carrier pipe, not casing protection, and was an error by the operator personnel. This read did not indicate a deficiency on the carrier pipe cathodic protection. The next read and previous historical reads verify this finding. The casing’s cathodic protection had no deficiencies, according to historical monitoring, and needed no remedial action. Reads on the associated carrier pipe at this location (Line 1016) were within tolerance.

## **Attachment 2**

### **Response to Areas of Concern**

#### **A. Areas of Concern Identified with Odor Intensity Test Reports**

During review of Odor Intensity Test Reports, SED found several test reports where instrument numbers (CT #) were recorded incorrectly on the odorant records. Some numbers were transposed or reversed (e.g. for CT 74452, the numbers were recorded as 54472 or 74472) while others were completely wrong (e.g. no instrument records were found for CT 46137). SED recommends that SCG emphasize the importance of accurate records with its field crews and their supervisors, so that the correct instrument numbers can be tracked and referenced for calibration and maintenance history.

#### **Response To Item A**

SoCalGas agrees with the recommendation by the SED and will emphasize the importance of accurate records to its operator personnel.