PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

August 20, 2016



GI-2015-02-SCG54-01A

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

Subject: General Order (G.O.) 112-FOperation and Maintenance Inspection of Southern California Gas Company Facilities in the West-SJV Transmission Area

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F Operation and Maintenance Inspection of Southern California Gas Company's (SCG) West San Joaquin Valley Transmission Area (Inspection Unit) Cathodic Protection (CP) Facilities on February 9-13, 2015. The inspection included a review of the Inspection Unit's cathodic protection and odorant records for calendar years 2013 and 2014 and random field inspections of pipeline facilities in the Taft and Valencia Transmission Districts. SED staff also reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff did not identify any probable violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192. However, SED noted concerns as described in the attached "Summary of Inspection Findings".

If you have any questions, please contact Randy Holter, at (213) 576-7153.

Sincerely, Kuneth A.B

Kenneth Bruno Program Manager Gas Safety and Reliability Branch Safety and Enforcement Division

CC: Randy Holter, SED/GSRB Matthewson Epuna, SED/GSRB Jeff Koskie, Sempra

Summary of Inspection Findings

SCG West SJV Transmission Inspection February 9-13, 2015

I. Concerns and Recommendations Summary

- 1. SED records review for the Inspection Unit noted that SoCalGas' facilities maps did not list or show all ETS, bonds, jumpers, rectifier stations regardless of status. SED recommends SoCalGas perform comprehensive mapping enhancements to identify all transmission pipeline facilities, regardless of active status. Please provide SED with an update of SoCalGas records procedures to address this concern.
- 2. During a 2/10/2015 field visit at L-103, Taft-112 odor monitoring site, SED observed the Technician not soap testing (using soap spray, in this case) joints before and after use of odorometer for testing. Checks for leaks all along testing tool and connecting parts should be completed before during and after testing equipment is connected. Please provide SED a record of training review for this employee regarding SoCalGas' Gas standard leak integrity for this covered task.
- 3. During a 2/12/2015 field visit at odor test station 103.117, SED observed SoCalGas field technician, Hawkins, eating in the field vehicle just before his odor test work activity. Please provide SED a record of training review for this individual pertaining to SoCalGas' Gas Standard on personal preparedness for this covered task.
- 4. During a 2/12/2015 field visit at test station 225.0.00-5, SED observed a SoCalGas field bond jumper abandoned but not sealed for atmospheric corrosion. Provide SED a work order, update and photo(s) of the remediation at this location.
- 5. SoCalGas' Gas Standard GS186.0135, Section 4.3.4.5 directs personnel to use procedures to "… verify and document the proper operation of …output meters at impressed current stations. Verification can be done by …. Calibrating voltage and amperage meters with approved instruments…" SED recommends that SoCalGas specify the secondary field gauges that may be used when permanent meters are not functional and the required calibration and maintenance procedures specified for those instruments.
- 6. During a 2/12/2015 field visit to North Coles Levee station, SED noted a 4-inch, ANSI 300 butterfly valve rated at 720psig operating on a section of L225 at designed MAOP of 771psig. SED understands the pipe pressure for this segment has been lowered to operate at or below 720psig until a permanent repair installed. Please provide SED the documentation that shows SoCalGas completed permanent remediation work.