

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 27, 2017

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

**GI-2016-01-SCG50-01B**

**Subject: General Order (G.O.) 112<sup>1</sup> Operation and Maintenance Inspection of Southern California Gas Company's Valves, Pressure Regulation and Overpressure Protection Facilities in the South Desert Transmission Area**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112<sup>1</sup> Operation and Maintenance Inspection of Southern California Gas Company's (SCG) Valves, Pressure Regulation and Overpressure Protection Facilities in the South Desert Transmission Area (Inspection Unit) on January 25-29, 2016. The inspection included a review of the Inspection Unit's Valves, Pressure Regulation, Overpressure Protection, and Welding records for calendar years 2013, 2014 and 2015 and field inspections of transmission pipeline facilities in the Beaumont and Blythe districts. SED staff also reviewed Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff identified three areas of concern which are described in the attached "Summary of Inspection Findings".

Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by SCG to address the concerns noted in the "Summary of Inspection Findings". If you have any questions, please contact Durga Shrestha, at (213) 576-5763.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

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

CC: Durga Shrestha, SED/GSRB, Kan Wai Tong, SED/GSRB  
Troy Bauer, Sempra

<sup>1</sup> General Order 112-F was adopted by the Commission on June 25, 2015 via 15-06-044

**Summary of Inspection Findings**  
**2016 SCG's South Desert Transmission Inspection**  
**January 25-29, 2016**

**I. SED Identified Probable Violation**

None

**II. Concerns and Recommendations**

1. SCG's Gas Transmission Work Order Number 5886294 showed that SCG's employee inspected the valve #6900-34.51-12 on August 17, 2015 with no comment. During the field inspection on January 28, 2016, SED's staff observed the valve was in "closed" position even though the operator believed it should indicate normally open. The schematic available at the station also showed that the valve should be in "normally closed" position. Please explain if there was any event that caused this valve to be changed from "normally open" to "normally close".
2. On January 28, 2016, SCG's Field Operation Supervisor for Transmission, stated that Transmission Pipeline Specialists (Transmission Valve Operators) were not trained to operate the transmission main valves using pneumatic actuator. He also stated that the Transmission Pipeline Specialists exercised the transmission valves using only the hydraulic actuator during its annual compliance inspection whenever the valve has both pneumatic and hydraulic actuator controller system. On the same day, a SCG's technician was unable to operate the valve #6900-34.51-17 which had only pneumatic actuator system, instead he requested the Instrument Specialist to operate the valve. When asked, the technician replied that he was unable to operate the valve with the pneumatic actuator, which confirmed the supervisor's statement. However, SED's staff noticed that this valve was last inspected by the same technician on August 17, 2015, but no comment recorded in the SCG Gas Transmission Work Order (Number 5886294). Please explain how the last valve inspection was completed by someone who could not operate the valve's pneumatic actuator system.
3. On January 28, 2016, SED's staff at Morongo Pressure Limiting Station on Line 6916 observed SCG's employee replaced a dirty filter from regulator with a different size filter and started putting the system back into service. SED's staff pointed the difference in the filter sizes and the SCG's employee inserted an identical sized filter and returned the system back into service safely. SED recommends SCG evaluate its employees' performance to determine the effectiveness of its procedures.