

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 20, 2017

Mr. 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-2017-07-SCG-57-02C

**Subject: SED Closure Letter for the General Order (G.O.) 112 Inspection of Southern California Gas Company's Mid-City LA Region (Inspection Unit)**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Southern California Gas Company's (SoCalGas) response letter dated September 29, 2017 that addressed one probable violation and three areas of concern identified during the G.O. 112<sup>1</sup> Inspection of SoCalGas' Mid-City LA Region (Inspection Unit) from July 10, 2017 to July 14, 2017.

Attached is a summary of SED's inspection findings, SoCalGas' responses to SED's findings, and SED's evaluation of SoCalGas' response to the identified probable violation and areas of concern.

This letter serves as an official closure of the 2017 G.O. 112 Inspection of SoCalGas' Mid-City LA Region.

If you have any questions, please contact Shuai "James" Zhang at (415) 603-1310 or email at james.zhang@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee". The signature is fluid and cursive.

Dennis Lee, P.E.  
Program and Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

CC: Troy A. Bauer, Sempra Energy Utility  
Terence Eng, SED/GSRB  
Kan Wai Tong, SED/GSRB  
Matthewson Epuna, SED/GSRB  
Kenneth Bruno, SED/GSRB  
Kelly Dolcini, SED/GSRB

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

**Summary of Inspection Findings**  
**2017 SoCalGas Mid-City LA Region – Inspection Unit**  
**(Belvedere, Juanita and Hollywood)**  
**July 10-14, 2017**

**I. SED Identified Probable Violation**

1. Title 49 CFR § 192.13 states:

*“(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.”*

SoCalGas’ Gas Standard 189.005, Operation of Odorometer, Section 4.1 states:

*“The odorometer should be sent to Capital Tool Repair at Pico Rivera (ML SC721A) every two years for calibration....”*

On July 12, 2017, SED staff noted that a SoCalGas employee conducted an odorant intensity testing at 337 N. 3<sup>rd</sup> Street, Montebello, with a Bacharach odorometer (CT 68064) that had an expired calibration date of June 29, 2017. The calibration for this odorometer had been expired by 13 days. Therefore, SoCalGas is in violation of Title 49 CFR, §192.13(c) for failing to adhere to its procedure.

**RESPONSE:**

SoCalGas consents to this finding. The current calibration date was expired on the odorometer (68064) used. SoCalGas did issue another order on the same day for a second test to be completed with equipment that was within its calibration. The reads were the same and no issues were found. The odorometer (68064) was sent to our instrument shop to be calibrated. When completed there were no issues found with the unit. The Gas Standard was reviewed with the employee with emphasis on checking the calibration of machines prior to using them.

**CORRECTIVE ACTION:**

SoCalGas is considering enhancements to safeguard against future occurrences. The proposed solution is to require the calibration date to be entered onto the electronic or paper orders. This would then require the employee to check and record the calibration on each inspection. For the electronic order, the program would not allow the order to be completed if the calibration date is not current.

**SED’s CONCLUSION:**

SED has reviewed SoCalGas’ response and has opted not to impose a fine or penalty since SoCalGas has created necessary corrective actions and the violation did not create any hazardous conditions for the public and utility employees. However, recurrence of the same violation in the future may result in an enforcement action.

**II. Areas of Concern and Recommendations**

1. During the field inspection, SoCalGas identified a code 3 leak at 5555 Washington Blvd, Los Angeles. Please provide SED an update on this leak.

**RESPONSE:**

The code 3 Leak order has been entered into SAP and placed onto the appropriate re-evaluation and repair cycles. Orders to address those required actions will be automatically

processed through the SAP and Click systems. No further orders to repair have been issued since this code 3 was identified. We will continue to address this leak as per our standards.

**SED's CONCLUSION:**

SED has reviewed SoCalGas' response and may review the implementation of the proposed corrective actions during future inspections.

2. While performing a patrolling inspection in the field, SED discovered that the Inspection Unit had installed small size line markers (curb markers) in the vicinity of its underground transmission line along Eastern Ave in the city of Commerce. The font and stroke sizes of the words on the line markers were smaller than what is required in Title 49 CFR, Part 192, Section 192.707 (d) (1). SED noticed that the transmission line involved was installed in an industrial area with vehicular traffic, and a full-size line marker was not impractical to install. SoCalGas claimed that the area was a Class 3 location, and all Class 3 locations can be deemed as "heavily developed urban areas", thus full size line markers need not be installed. SED believes SoCalGas should make its best effort to install full-size line markers near lines in the interest of public safety, where practical. Therefore, SED recommends SoCalGas reconsider revising its procedure to redefine "heavily developed urban area."

**RESPONSE:**

Title [49 CFR, Part 192, Section 192.707 \(d\) \(1\)](#) states that line marker lettering is not required to be standard size for "heavily developed urban areas". The Company Gas Standard defines "heavily developed urban areas" as Class 3 and 4 locations. However, the Gas Standard does not limit these locations to using only curb markers, but instead allows the operating base to assess whether curb markers are more practical than other marker types for the given situation. SoCalGas will review our policy to determine if changes are warranted.

**SED's CONCLUSION:**

SED has reviewed SoCalGas' response and may review the implementation of the proposed corrective actions during future inspections.

3. During the field inspection, SED inspected some emergency equipment and materials in the storage area in Belvedere district. SED observed some 2", 4", and 6" pre-tested polyethylene (PE) pipes with removable labels stored with other untested pipes. To avoid potential mix-ups with the removable labels, SED recommends SoCalGas secure the pre-tested and tested pipes in separate locations.

**RESPONSE:**

SoCalGas agrees with SED's recommendation and will store pre-tested pipes separated and away from untested pipes. SoCalGas is also looking for potential solutions for permanent marking of the pre-test pipes that is not removable and will not impair the usability and integrity of the pipe for fusions.

**SED's CONCLUSION:**

SED has reviewed SoCalGas' response and may review the implementation of the proposed corrective actions during future inspections.