

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 30, 2017

GI-2017-07-SCG-57-02C

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.) 112¹ Inspection of Southern California Gas Company's
Mid-City LA Region**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112¹ inspection of Southern California Gas Company's (SoCalGas) Mid-City LA Region (Inspection Unit) on July 10 through 14, 2017. The inspection included a review of the Inspection Unit's Patrolling, Leakage Survey, and Odorant records for calendar years 2013 through 2016 and field inspections of pipeline facilities in the Belvedere, Juanita and Hollywood 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 identified one probable violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192. SED also noted three concerns as described in the attached "Summary of Inspection Findings".

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by SoCalGas to address the violation and concerns noted in the Summary of Inspection Findings. If you have any questions, please contact Shuai "James" Zhang at (415) 603-1310 or by email at james.zhang@cpuc.ca.gov.

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: Troy Bauer, SoCalGas/Pipeline Safety & Compliance
Terence Eng, SED
Kan Wai Tong, SED
Kelly Dolcini, SED

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

Summary of Inspection Findings

I. Probable Violations

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. 3rd 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.

II. Areas of Concerns 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.
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”.
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.