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10/27/2017

Mr. Ken Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 W. Fourth Street, Suite 500
Los Angeles, CA 90013

Dear Mr. Bruno:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112, Operation and Maintenance Inspection of Southern California Gas Company's (SoCalGas) G.O. 112-F Comprehensive Operation and Maintenance Inspection of Southern California Gas Company's (SoCalGas) San Gabriel Valley Area (Inspection Unit) from July 31, 2017 to August 4, 2017. The inspection included a review of the Inspection Unit's Patrolling, Leakage Survey, and Odorant records for calendar years 2013, 2014, 2015, and 2016; Corrosion Control records for calendar years 2015 and 2016; Regulator Stations, Vaults, and Valves for calendar year 2016; Safety-Related Condition Reports for calendar years 2014, 2015, and 2016; and field inspections of pipeline facilities in the Alhambra, Pasadena, and City of Industry Distribution Districts. SED's staff also reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff identified 2 probable violations. Attached are Southern California Gas Company's (SoCalGas) written responses.

Please contact Troy A. Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,



Troy A. Bauer

CC:
Ha Nguyen, SED/GSRB
Matthewson Epuna, SED/GSRB
Sophia Ngo-Conn, SED/GSRB

Summary of Inspection Findings

**2017 SoCalGas San Gabriel Valley Distribution Area - Inspection Unit
(Alhambra, Pasadena, and City of Industry)
July 31 – August 4, 2017**

SED Identified Probable Violations

1. Title 49 Code of Federal Regulations (CFR), Part 192 §192.13 What general requirements apply to pipelines regulated under this part?

§192.13 What general requirements apply to pipelines regulated under this part 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 (GS) 223.0100 – Leakage Survey §10.2.1.4 states in part:

“All below ground leaks are noted in red and marked with an “X...”

During record review, SED noted that SoCalGas discovered a Code 3 gas leak in 2014 and appropriately marked it with an X in its 2014 leak survey map (LA 720-4). However, the Inspection Unit failed to mark the Code 3 leak with an X on the map during its 2015 annual re-evaluation of Code 3 gas leaks that were not repaired, as required by its GS 223.0100 section 10.2.1.4. Therefore, SoCalGas is in violation of General Order 112-F, Reference Title 49 CFR, Part 192 §192.13(c).

RESPONSE:

SoCalGas acknowledges that the employee failed to mark the pre-existing leak per Gas Standard 223.0100. It was demonstrated during SED’s inspection that although the employee failed to mark the pre-existing leak, the employee had identified a Code 1 leak during the same inspection and that he documented the leak correctly per Gas Standard 223.0100.

CORRECTIVE ACTION:

SoCalGas conducted a random audit of leak survey maps that the identified employee had previously completed. This audit consisted of a review of 7 maps/orders that the employee had worked. The audit revealed the employee had documented new and existing leaks correctly.

Leak Survey Order#	FLOC	LEAKS FOUND/DOCUMENTED
520001045689	GD.ORC.ALH.MP.LA5882	1 EXISTING, 1 NEW
520001069607	GD.ORC.ALH.MP.LA3610	1 EXISTING, 1 NEW
520001068456	GD.ORC.ALH.MP.LA3621	1 EXISTING
520001021194	GD.ORC.ALH.MP.LA5913	2 NEW
520000997593	GD.ORC.ALH.MP.PAS1322	2 NEW
520000941929	GD.ORD.ALH.MP.LA3665	2 NEW
520001021201	GD.ORC.ALH.MP.LA3615	2 NEW

The identified employee is currently in a new position and still maintains Leak Survey operator qualification. The employee was counseled on his actions and provided a review of Gas Standard 223.0100. In addition, SoCalGas confirmed with Operations Training that properly identifying new and existing leaks per GS 223.0100 is part of the training curriculum.

Currently, and at the time the leak survey was conducted in 2015, SoCalGas leakage department issues the technicians “shop papers” with the leak survey maps. The “shop papers” identify existing leaks on the associated leak survey map and are a tool provided to the field to assist the technicians in identifying and referencing existing leaks. The “shop papers” are also a tool utilized to prevent the duplication of leaks.

In addition to the “shop papers”, and as part of SoCalGas continuing to expand the technological capabilities of our Geographic Information System (GIS), existing Code 2 and Code 3 (Steel and Plastic) leak locations were added the leak survey maps during our production update that occurred May 18, 2017.

Title 49 CFR, Part 192 §192.706 – Transmission lines: Leakage surveys

§192.706 Transmission lines: Leakage surveys states:

“Leakage surveys of a transmission line must be conducted at intervals not exceeding 15 months, but at least once each calendar year. However, in the case of a transmission line.....”

SED noted that approximately 1000 feet of Line SL31-08-F that was defined as transmission line (operating over 20% SMYS on map LA 593-20) was not leaked survey in accordance with leakage survey requirements for transmission pipelines during the calendar year 2014. Therefore, SoCalGas is in violation of General Order 112-F, Reference Title 49 CFR, Part 192 §192.706.

RESPONSE:

SoCalGas acknowledges that the annual 2014 inspection for 927 feet of High Pressure (HP) pipeline on SL 31-08-F was not performed within the 15-month compliance inspection cycle. SoCalGas’ investigation revealed that this segment of pipe was not captured on the 2014 leak survey inspection map due to an edit that had been made to the SAP Functional Location (FLOC) boundary which caused the eGIS auto-updater to incorrectly assign the segment of pipeline to GD.ORB.PAS.MP.LA05934 which had an overlapping boundary with GD.ORB.PAS.MP.LA05932 (LA 593-20). The segment of pipeline was surveyed on January 22, 2015 and no leakage findings or safety issues were detected during the leak survey inspection on this section of pipeline.

CORRECTIVE ACTION:

On 6/26/2014, the eGIS auto-updater logic was updated to address this potential error where Leak Survey Area (LSA) boundaries overlap. In addition, SoCalGas identified the need for a quality control (QC) tool to be added to the eGIS editor's process that runs whenever the editor makes a change in eGIS the QC tool highlights to an eGIS editor if the proposed change has affected the FLOC assignment. This added QC tool was implemented to address the type of issue identified on SL 31-08-F. Work was also performed to identify where this auto-updater may have impacted FLOC assignments and corrections were completed. This review was completed in December of 2014. Furthermore, leakage clerks were made aware of the issue and as an added step, they perform audits of the boundary of the leak survey map to identify if segments may have moved between FLOCs that may have been missed during clean-up efforts.

At the time of the update, communication was provided by the Leakage Supervisors to the Leakage Clerks addressing the need to minimize the window between eGIS update initiation and approval by the Leakage Supervisors. They were also made aware and trained to address the possible compliance gaps that can be created when requesting the movement of segments between Leak Survey Areas.