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10/12/2017

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) North Coast Distribution from June 26, 2017 to June 30, 2017. The inspection included a review of records for the period January 1, 2013 through December 31, 2016. A representative sample of SoCalGas' facilities and right-of-way were also inspected. 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 2 areas of concern. 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:
Kelly Dolcini, GSRB-SF
Dennis Lee, GSRB

**2017 SoCalGas North Coast Distribution
6/26/2017 to 6/30/2017**

SUMMARY OF INSPECTION FINDINGS

I. Probable Violations

None.

II. Areas of Concern and Recommendations

1. Title 49 CFR §192.463 External corrosion control: Cathodic protection states in part:

“(a) Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in appendix D of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.”

During the inspection, SCG personnel found low pipe-to-soil potentials at the following locations:

- | | |
|---|--------|
| a. 561 ALISAL, SOLVANG 93463-2666 | -483mV |
| b. 608 CENTRAL, SANTA MARIA 93454-5713 | -755mV |
| c. 199 2 ND , TEMPLETON 93465-5316 | -738mV |
| d. 720 GOUGH, TEMPLETON 93465-5004 | -748mV |
| e. 258 VIA RAMONA, PASO ROBLES 93446-3529 | -505mV |

RESPONSE:

SoCalGas has provided an update to the above referenced locations in the tables below. All of these locations have been brought into tolerance.

Table 1 CP Areas

Area	Location	District	Audit Read	Date Read Up	Lower Limit	Up Read	Remediation
HR248	608 Central, Santa Maria	Santa Maria	-0.755V	07/07/2017	-.0850V	-1.331V	Increased rectifier current to Area

Table 2 CP 10% Test Points

CP 10% Location	District	Audit Read	Date Read Up	Up Read	Remediation
561 Alisal, Solvang	Santa Maria	-0.483V	09/19/2017	-1.210V	Installed 1 lb anode.
199 2 nd , Templeton	Templeton	-0.738V	09/19/2017	-1.208V	Installed 1 lb anode.
720 Gough, Templeton	Templeton	-0.748V	09/19/2017	-1.535V	Installed 1 lb anode.
258 Via Ramona, Paso Robles	Templeton	-0.505V	09/19/2017	-1.735V	Installed 1 lb anode.

2. Title 29 CFR §192.355(b) Customer meters and regulators: Protection from damage. This code section states:

(b) Service regulator vents and relief vents. Service regulator vents and relief vents must terminate outdoors, and the outdoor terminal must—

- (1) Be rain and insect resistant;
- (2) Be located at a place where gas from the vent can escape freely into the atmosphere and away from any opening into the building; and
- (3) Be protected from damage caused by submergence in areas where flooding may occur.

While doing field work at 219 West Chapel St., Santa Maria, SED staff noted that there was an enclosure around a meter set that generated concern about proper venting per 192.355(b). Because of this concern, SoCal Gas staff drilled a vent hole into the top of the wood structure during the week of the inspection. No response is necessary.

RESPONSE:

As stated above, no response is necessary.