

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 22, 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-2017-09-SCG67-03C

**Subject: General Order (G.O.) 112-F Operation and Maintenance Inspection of Southern California Gas Company's Leakage Surveys program in the North Valley Distribution Region**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F, Operation and Maintenance Inspection of Southern California Gas Company's (SCG) leakage survey and patrolling programs in the North Valley Distribution Region (Inspection Unit) on September 11-15, 2017. The inspection included a review of the Inspection Unit's leak survey, odorant, and patrolling records for calendar years 2013 to 2016 and field inspections of pipeline facilities in the Lancaster, Bradford, and Valencia districts. Also, SED's staff reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED's staff identified two violations and the Inspection Unit reported one violation which are both described in the enclosed "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.

If you have any questions, please contact Kan-Wai Tong at (213) 576-5700 (or by email at [kwat@cpuc.ca.gov](mailto:kwat@cpuc.ca.gov)) or Desmond Lew, at (213) 576-7020 (or by email at [dl4@cpuc.ca.gov](mailto:dl4@cpuc.ca.gov)).

Sincerely,

A handwritten signature in blue ink, reading "Kenneth A. Bruno", is positioned above a rectangular area that appears to be a stamp or a placeholder for a signature.

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

CC: Troy Bauer, Sempra  
Matthewson Epuna, SED/GSRB  
Kan-Wai Tong, SED/GSRB  
Desmond Lew, SED/GSRB

**Summary of Inspection Findings  
2017 SCG Valley North Distribution Inspection  
September 11-15, 2017**

**I. SCG's Identified Violations**

SED reviewed the SCG self reported violations consisting of sections of pipe which were on a five year leak survey schedule relating to pipe under cathodic protection, but were not cathodically protected and should have been under a three year leak survey schedule. SCG provided work orders and leak survey results to show immediate attention to address the issue and take remedial action. SCG is in violation of General Order 112-F, Reference Title 49 CFR, Part §192.723 (b) (2).

**II. SED's Identified Probable Violations**

1. Title 49 CFR §192.605(a) states in part:

*“Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities ....”*

SCG's Gas Standard 189.0005 Operation of Odorometer, Sections 3.2.6 and 3.3.2 states in part:

*“3.2.6 Connect the sample line to the Odorometer. Check for and fix any gas leaks to avoid odor interference with the test....”*

And

*“3.3.2 Odor Intensity at 0.9% Gas in Air....”*

During SED's field inspection at SCG Valencia District, SED observed an odorant intensity test performed by a SCG technician per SCG's GAS STANDARD 189.005 at 19527 Goldstream Way, Newhall (ID 235). However, the technician did not perform the two steps stated above as per SCG Gas Standard 189.005, Sections 3.2.6 and 3.3.2. When questioned, the technician acknowledged not following the procedures in the Gas Standard. Therefore, SCG is in violation of General Order 112-F, Reference Title 49 CFR, Part §192.605(a).

2. Title 49 CFR §192.723 (b) (1) states in part:

*“A leakage survey with leak detector equipment must be conducted in business districts...at intervals not exceeding 15 months, but at least once each calendar year.”*

SCG Standard 223.0100 Leakage Surveys, Section 6.4 states in part:

*“6.4 If during the survey, the leak surveyor identifies land uses that could potentially trigger a business district determination that is not currently depicted upon the leak survey map; they should identify this location for further evaluation...”*

During SED's records review of two Leak Survey Maps (LA 1061 and LA 1062), SED observed that a gas main, installed on Sayre Street between De Garmo Avenue and Glenoaks Boulevard, had two different leak survey cycles. These Leak Survey Maps prior to 2014 showed the portion of the gas main southwesterly of De Haven Avenue and northeasterly of De Garmo Avenue having a three-year leak survey frequency and the portion of the gas main northeasterly of De Haven Avenue and southwesterly of Glenoaks Avenue having a one-year leak survey frequency. The Leak Survey Maps after 2014 showed the entire pipeline to be a one-year leak survey frequency.

These Leak Survey Maps indicated that both portions of the gas main were installed in the same proximity of a nearby business area and should be assigned the one-year leak survey cycle. Therefore, SCG is in violation of General Order 112-F, Reference Title 49 CFR, Part §192.723 (b) (1).