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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 General Order 112 inspection of Southern California Gas Company's (SoCalGas) Desert Valley Region (Inspection Unit) on October 23 through 27, 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 Palm Desert, El Centro/Blythe and Yucca Valley 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 1 probable violation and 6 Observations. 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:
Aimee Caguiran, SED
Kan Wai Tong, SED
James Zhang, SED
Kelly Dolcini, SED

Summary of Inspection Findings

I. Probable Violations

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

“A leak survey with leak detector equipment must be conducted in business districts, including tests of the atmosphere in gas, electric, telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at other locations providing an opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year.”

During SED’s records review of Compliance Leak Survey (1 year), SED found that SoCalGas had not conducted a leak survey aforementioned at least once each calendar year, but not exceeding 15 months, in the following instances:

Table 1: SoCalGas Desert Valley Compliance Leak Survey (1 year)

SAP ID	District	Atlas	Type	Previous leak survey date mm/dd/yy	Next leak survey date mm/dd/yy	Days late
GD.INL.PMD.MP.GI0023B12	Palm Desert	GI 23 B12	1 year	05/01/15	08/10/16	10
GD.INL.PMD.MP.GI0004E18	Palm Desert	GI 04 E18	1 year	07/01/14	01/22/16	112

Therefore, SoCalGas is in violation of Title 49 CFR, §192.723(b)(1).

RESPONSE:

SoCalGas investigated each of the identified instances above and identified the following;

GI0023B12 - This location and discrepancy was identified by leakage clerical while working on a GIS/SAP leak survey footage comparison report. The clerk identified that approximately 1,072' of main had not been surveyed since May 2015. Investigation at that time revealed that the 4" High Pressure steel installed in 2003 had formerly been assigned to Palm Desert District map GI24B12. Subsequent system upgrades converted the pipeline over to GI23B12 in December of 2014 and a maintenance plan was not created on the new map. Upon discovery of the discrepancy a maintenance plan was created and a leak survey order was issued (52/1396478). 1,072' of main was surveyed on August 10, 2016. No leaks were found.

GI0004E18 - This particular leak survey relates to a ½” tap on Transmission Line 2000 at milepost 123.64. SoCalGas investigation revealed that this tap was abandoned in 1972; therefore, no leak survey was required. During the audit, SoCalGas had not completed its investigation of the taps existence. SoCalGas had upon notification of the potential existence of this tap manually created the leak survey orders to ensure leak survey was completed while the investigation continued. An automated maintenance plan was not created in SAP pending the investigation. Through continued research efforts between Gas Operations and Transmission, Transmission was able to provide documentation demonstrating that the tap had been abandoned in April 1972. See attached PDF.

CORRECTIVE ACTIONS:

SoCalGas takes pipeline safety and compliance very seriously and is actively involved in updating state-of-the-art tools such as the System Applications Products (SAP) and Enterprise Geographic Information System (eGIS). SoCalGas recognizes that the GIS mapping system has areas of continuous improvement and that there are instances where the legacy information which was imported needs editing and the field must recognize and report data request. SoCalGas has developed an online process where stakeholders can submit requests to update the leak survey maps and FLOC id used to coordinate work with the company's work management systems.

SoCalGas continues to recognize the need to continue to develop tools and reports to help identify discrepancies between SAP and GIS. Our effort to address the concerns raised in this audit is demonstrated by our implementation of a report to capture potential GIS and SAP discrepancies. One such report was created in 2016 which identifies leak survey pipe footage discrepancies between GIS and SAP Functional Locations (FLOCS). This report is utilized by leakage clerical to validate that all "mapped" pipe in GIS is related to a leak survey cycle.

II. Areas of Concerns/Observations/Recommendations

During SED's field visits, SED made the following observations:

1. A new leak was observed at the MSA fitting at 74050 Scholor Lane West, Palm Desert
2. A new leak was observed in a valve box at 909 First St., Calexico
3. Two meters were found in contact with the ground at 35450 Mexico Way, Thousand Palms
4. Atmospheric corrosion was observed on the meter set at 71990 Sunnyslope Drive, Twentynine Palms
5. The regulator vent is within 3 feet of the window at 72008 Sunnyslope Drive, Twentynine Palms
6. The regulator vent is within 3 feet of the house air ventilation inlet/outlet at 6045 Cahuilla Ave, Twentynine Palms

As of 11/13/2017, SoCalGas has addressed all of the observations above and provided SED with the records of corrective actions. There are no further actions required from SoCalGas at this time. This serves as a record of SED's observation.

RESPONSE:

None required.