

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 22, 2017

GI-2017-10-SCG-62-02C

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
Mountain Pass Distribution Area**

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 (SCG) Mountain Pass Distribution Area (Inspection Unit) on October 2 through October 6, 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 San Bernardino, Beaumont, and Rim 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 one concern 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 SCG to address the violation and the concern noted in the Summary of Inspection Findings. If you have any questions, please contact Jason R. McMillan at (916) 928-2271 or by email at jason.mcmillan@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, SCG/Pipeline Safety & Compliance
Aimee Cauguiran, 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

A. SCG Internal Audit Findings

No exceptions were listed within the San Bernardino, Beaumont, or Rim Districts.

B. SED Findings

Title 49 CFR, Part 192 §192.353(a) states in part:

“Each meter and service regulator, whether inside or outside a building, must be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage that may be anticipated.”

During the field portion of the inspection, SED observed the following meter set assemblies (MSAs) at three different addresses (within the same leak survey map) that were unprotected from possible vehicular damage:

- 1772 Miranda Lane, Beaumont
- 1785 Miranda Lane, Beaumont
- 856 Liam Way, Beaumont.

According to SCG, the MSAs were installed on 06/04/2004, 01/15/2014, and 07/17/2004 respectively.

Two of these MSAs were installed more than ten years ago, and SCG should have identified the need for protection of the MSA through their continuing surveillance program. All three MSAs were located in areas susceptible to vehicular damage and thus required protection upon installation. Therefore, this SCG’s Inspection Unit is in violation of G.O. 112-F, Reference Title 49 CFR, Part 192 §192.353(a).

II. Areas of Concerns and Recommendations

During the field portion of the inspection, SED observed a distribution pipe span under a bridge (span B01) which was not marked with any identification along the exposed pipe. This span ran alongside several other exposed pipes of various utilities, and looked very similar to them. SED reviewed SCG’s Procedure 184.12: “Inspection of Pipelines on Bridges and Spans” and noted that labeling or stenciling on the pipe is not part of the “Bridge Inspection Criteria and Required Actions.” SED’s concern is that in areas where the gas pipeline runs parallel to other utility lines, confusion may occur and utility workers could erroneously inspect, or possibly perform work on, the wrong line. SED recommends marking the exposed pipe span with some type of identification, or label, to reduce the possibility of a utility worker confusing it for another type of line. Furthermore, SED recommends that SCG incorporate a requirement to inspect exposed distribution pipes for identification or

markings on the pipe itself, especially in places where the pipe is in close proximity to other utility lines, or in areas where the pipeline markers may not be visible.