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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 G.O. 112, Operation and Maintenance Inspection of Southern California Gas Company's (SoCalGas) Mountain Pass Distribution Area from October 2, 2017 to 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 1 probable violation and 1 area 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:  
Aimee Cauguiran, SED  
Kan Wai Tong, SED  
Kelly Dolcini, SED

## **Summary of Inspection Findings**

### **I. Probable Violations**

#### **A. SoCalGas 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 SoCalGas, 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 SoCalGas 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, SoCalGas' Inspection Unit is in violation of G.O. 112-F, Reference Title 49 CFR, Part 192 §192.353(a).

#### **RESPONSE:**

SoCalGas initiated work orders for the installation of meter guards at the aforementioned locations.

#### **CORRECTIVE ACTION:**

SoCalGas executed work orders and installed meter guards at;

- 1772 Miranda Lane, Beaumont (SAP #54-207190)
- 1785 Miranda Lane, Beaumont (SAP #54-207930)
- 856 Liam Way, Beaumont (SAP #54-207966)

The Abnormal Operating Condition policy, as well as Gas Standard 185.0008 / *Meter Guard Installation Requirements*, was reviewed with the Beaumont field employees to reinforce the importance of identifying and reporting AOCs found at the Meter Set Assembly (MSA).

In addition to Gas Operations and Customer Field employee's being required to inspect MSA's for AOC's, SoCalGas recently implemented the Meter Set Assembly (MSA) Inspection Program. The program's sole purpose is to provide a thorough MSA inspection process; including verifying the MSA is not susceptible to vehicular damage per DOT requirements. Included in the training for the Meter Inspection Representative (MIR) is the review of Gas Standard 185.0228 *Meter Set Assembly Inspections – Section 7 / Meter Protections*.

### **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 SoCalGas' 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 SoCalGas 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.

### **RESPONSE:**

SoCalGas disagrees with these two SED recommendations for a couple of reasons. First, SoCalGas currently complies with Title 49 CFR, Part 192 §192.707(c) which states in part:

*"Pipelines aboveground. Line markers must be placed and maintained along each section of a main and transmission line that is located aboveground in an area accessible to the public".*

In addition, SoCalGas employees are provided the training and tools necessary for them to properly identify our assets. Furthermore, if a SoCalGas employee is not comfortable that he/she can properly complete an inspection, they are trained to "stop-the-job" and request assistance from another employee or their immediate supervisor. For these reasons, SoCalGas does not believe that these two recommendations should be adopted.