

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 15, 2017

GI-2017-02-SCG-51-01C

Jimmie Cho, Senior Vice President  
Gas Operations and System Integrity  
Southern California Gas Company  
555 West 5th Street, GT21C3  
Los Angeles, CA 90013

**SUBJECT: Safety and Enforcement Division Closure Letter for the General Order 112  
Inspection of Basin Area Transmission Patrolling & Leak Surveying Facilities of  
Southern California Gas Company**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Southern California Gas Company's (SoCalGas) response letter dated March 30, 2017 for the findings identified during the General Order (GO) 112<sup>1</sup> inspection of SoCalGas Basin Area Transmission which was conducted from February 6-10, 2017.

A summary of the inspection findings documented by the SED, SoCalGas' response to SED findings, and SED's evaluation of SoCalGas' response taken for each finding are outlined for each identified violation, concern and recommendation.

This letter serves as the official closure of the 2017 SoCalGas Basin Area Transmission safety inspection and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this audit. Please contact Joel Tran at (415) 515-3442 or by email at joel.tran@cpuc.ca.gov if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.  
Program and Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

cc: Troy Bauer, SoCalGas (TBauer@semprautilities.com)  
Kenneth Bruno, SED (kenneth.bruno@cpuc.ca.gov)  
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Kelly Dolcini, SED (kelly.dolcini@cpuc.ca.gov)

<sup>1</sup> General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 15-06-044.

## **I. Potential Violations**

SED did not find any violations.

## **II. Areas of Concern**

### **AOC-1**

During SED's review of Patrolling and Leak Surveying records, SED noted a location where additional pipeline markers were required to be installed and no corrective action was taken. However, it was determined during SED's inspection that the additional pipeline markers were installed on the same date as the patrolling.

- Work Order #5912327, Line 1228.2-East. On 10/16/2015, a patrol/leak survey inspection with notes stating "Pipeline Marker Maintenance needed in various locations thru out the pipeline."

SoCalGas should have recorded the installation of the pipeline markers for recordkeeping purposes.

### **SoCalGas Response:**

SoCalGas investigated the observations identified by SED, and found that Patrol and leak survey work order #5912327 had indicated a need for additional line markers on Line 1228.2- East. Although the markers were installed the same date as the inspection order, comments and documentation indicating that the follow up work was completed on the original work order were not noted.

SoCalGas has taken the SED's recommendation into consideration and in order to prevent a recurrence, local management at each District will communicate with employees the requirement to properly document all work completed on the appropriate work order.

### **SED's Conclusion:**

SED will check in future inspections to ensure that SoCalGas has indeed remediated these issues.

### **AOC-2**

During SED's record review of Bridge and Span maintenance records, SED noted four Work Orders created on May 28, 2013 on which an employee indicated follow up maintenance was required (coating is damaged and in need of maintenance). However, upon supervisor review it was determined that work for these spans was already completed in 2012 (Work Order Authorization #25248), when the spans in question were recoated with paint. The 2014 inspection revealed no issues with the coating. SoCalGas stated that they did not know why the employee indicated that work was required in 2013. The employee is currently on disability leave, so he/she cannot be reached for an interview.

- Work Order #5203376
- Work Order #5203269
- Work Order #5203203
- Work Order #5203194

**SoCalGas Response:**

During the 2017 SoCalGas Basin audit, SED verified and agreed that the spans in question required no follow-up work and no abnormal operating conditions (AOCs) were present during the inspection. SoCalGas has taken the SED's recommendation into consideration and in order to prevent a recurrence, local management at each District will communicate with employees the requirement to properly document all work completed on the appropriate work order.

**SED's Conclusion:**

SED will check in future inspections to ensure that SoCalGas has indeed remediated this issue.