PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



February 28, 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: General Order (G.O.) 112 Operation and Maintenance Inspection of Southern California Gas Company's Patrolling & Leak Surveying Facilities in the Basin Transmission Area

Dear Mr. Cho:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Joel Tran, Andy Chau, and Monica Robledo conducted a General Order 112 inspection of Southern California Gas Company's (SoCalGas) Basin Area Transmission (Inspection Unit) from February 6-10, 2017.¹ The inspection included a review of the Inspection Unit's operation and maintenance records for the years 2013 through 2016, and a field inspection of a representative sample of the Inspection Units' facilities. SED staff also reviewed the Inspection Unit's operator qualification records, which included a field observation of randomly selected individuals performing covered tasks.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by SoCalGas to address the observations noted in the Summary.

If you have any questions, please contact Joel Tran at (415) 515-3442 or by email at joel.tran@cpuc.ca.gov.

Sincerely,

Kuneth A. Br

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

Enclosure: Summary of Inspection Findings

cc: Troy Bauer, SoCalGas (TBauer@semprautilities.com) Dennis Lee, SED (dennis.lee@cpuc.ca.gov) Terence Eng, SED (terence.eng@cpuc.ca.gov)

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

SUMMARY OF INSPECTION FINDINGS

I. Potential Violations

SED did not find any violations.

II. Areas of Concern

- 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.

Please provide to SED what SoCalGas plans to do to address this issue and to prevent recurrence.

- 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

Please provide to SED what SoCalGas plans to do to investigate this issue and to prevent recurrence.