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March 30th, 2017

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 inspection of Southern California Gas Company's (SoCalGas) Basin Area Transmission (Inspection Unit) from February 6-10, 2017. 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 staff noted two areas of concern. Attached are SoCalGas' written responses and corrective actions.

Please contact Troy Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,

Troy A. Bauer

cc: Dennis Lee, SED/GSRB
Terence Eng, SED/GSRB
Matthewson Epuna, SED/GSRB
Kan Wai Tong, SED/GSRB
Joel Tran, SED/GSRB

Attachment 1
Response to Areas of Concerns

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.

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.

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.

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.