

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 19, 2018

Jimmie Cho, Senior Vice President  
Customer Service & Distribution Operations  
Southern California Gas Company  
555 West 5<sup>th</sup> Street, GT21C3  
Los Angeles, CA 90013

**GI-2018-04-SCG-61**

**Subject: SED Closure letter for General Order (G.O.) 112-F Comprehensive Operation and Maintenance Inspection of Southern California Gas Company's Desert Valley Distribution Region**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F Comprehensive Operation and Maintenance Inspection of Southern California Gas Company's (SCG) Desert Valley Distribution Region (Inspection Unit) on April 02 – 13, 2018 for calendar years 2015 thru 2017. SED used the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety's "Inspection Assistant Form" as a reference guide to conduct the inspection. SED conducted field inspections of pipeline facilities in the Palm Desert, El Centro and Yucca Valley Distribution districts within the Inspection Unit. SED's staff also reviewed the Operator Qualification program, which included field observation of randomly selected individuals performing covered tasks.

A summary of the inspection findings documented by the SED, SCG's response to the findings, and SED's evaluation of SCG's response to all findings are outlined in the attached "Summary of Inspection Findings."

This letter serves as the official closure of the 2018 Comprehensive O&M Inspection of facilities in SCG's Desert Valley Distribution Region.

Thank you for your cooperation in this inspection. If you have questions, please contact Durga Shrestha, at (213) 576-5763 or by e-mail at [ds3@cpuc.ca.gov](mailto:ds3@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee". The signature is fluid and cursive, with the first name "Dennis" and last name "Lee" clearly distinguishable.

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

CC: Durga Shrestha, SED/GSRB; Kan Wai Tong, SED/GSRB; Kelly Dolcini, SED/GSRB;  
Kenneth Bruno, SED/GSRB; Troy Bauer, Semptra

**Summary of Inspection Findings**  
**2018 SCG's Desert Valley Distribution Inspection**  
**April 02 - 13, 2018**

**I. SED Identified Probable Violations**

**Title 49 CFR, Part 192, Section 192.13 What general requirements apply to pipelines regulated under this part?**

*“(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.”*

During the field inspection of SCG's leak detection survey program, SED staff noted a discrepancy on SCG's gas facilities records on the survey Map PWE-109 at 9878 Sundown Trail, Morongo Valley, CA. According to SCG's service history record ID #21561792, its customer (MSA #12051487) receives natural gas supply from SCG's HP supply line 41-54. However, a SCG's employee showed SED staff a GIS map on his MDT that showed the aforementioned MSA received natural gas from its Transmission Line 6916. The SCG's Inspection Unit confirmed that the GIS map was outdated. SED noted that the operator's GIS Map was not modified as accordingly. Therefore, SCG is in probable violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Sections 192.13(c).

**SCG's RESPONSE:**

SoCalGas' official record for services is its SAP *Service History* database. In this case, SoCalGas had documented its service information accurately thus meeting its obligation under 192.13.

In 2012, to integrate its various datasets, SoCalGas copied its Service History information into its GIS system and began actively integrating data from its SAP Service History database into GIS as updates occur. In the case of the service at 9878 Sundown Trail, Morongo Valley, CA, the editor depicted the connection of the service inaccurately during the 2012 data conversion and it was not caught by the quality control process at the time; nor were there any field reports indicating that the error was detected.

SoCalGas continues to look for ways to improve the integration of GIS with our official service records. When potential discrepancies are indicated in the field, our current system has avenues to report the condition for investigation and correction as appropriate.

**CORRECTIVE ACTIONS:**

SoCalGas recognized this discrepancy and the GIS records were updated on May 4, 2018 to accurately reflect the service being supplied from supply line 41-54.

**SED's Conclusion:**

SED has reviewed SCG's response and accepts the proposed corrective actions. SED acknowledges that the proposed corrective actions will sufficiently address the aforementioned violation. However, SED may review the implementation of these stated corrective actions during future inspections.

## **II. Concerns, Observations and Recommendation**

### **Title 49 CFR, Part 192, Section 192.463 (a) External corrosion control: Cathodic protection.**

*“Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in [Appendix D](#) of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.”*

During the field inspections of CP facilities, SED observed that the pipe-to-soil reads at the following locations as shown in the table were out of tolerance (low P/S reads) from its -0.850 volts criteria:

Area	Point	District	Read, V
RAM REC 1	G	Palm Desert	-0.394
RAM REC 1	D	Palm Desert	-0.424
IND WEL REC 3	E	Palm Desert	-0.786
IND WEL REC 3	H	Palm Desert	-0.796
BRA REC 10	L	El Centro	-0.803
BRA REC 10	M	El Centro	-0.686
BRA REC 10	J	El Centro	-0.613
BRA REC 10	K1	El Centro	-0.676
BRA REC 10	O	El Centro	-0.701

Also, the following 10% test points were out of tolerance from the -0.85 volts criterion:

CP10 ID	District	Read, V
71384	Palm Desert	-0.603
71499	Palm Desert	-0.364
6658309	EL Centro	-0.842
6658314	El Centro	-0.829

SED recommends that SCG take prompt remedial actions to correct these corrosion control deficiencies.

### **SCG's RESPONSE:**

SCG conducted troubleshooting/remediation actions upon identification of the deficiencies. Status of locations is as follows;

Area	Point	District	Read, V	UP Read	UP Date	SCG Comments
RAM REC1	G	Palm Desert	-0.394	Pending	Pending	SoCalGas commenced troubleshooting activity and identified a short creating a high current drain on a service. WO 54/256329 issued to replace high drain service. Start date of 7/2/18
RAM REC1	D	Palm Desert	-0.424	Pending	Pending	

IND WEL REC 3	E	Palm Desert	-0.786	-0.916	4/10/2018	Watered anode bed, area responded. 52/1813072
IND WEL REC 3	H	Palm Desert	-0.796	-0.929	4/10/2018	
BRA REC 10	L	El Centro	-0.803	N/A	N/A	100mV polarization shift area, lower tolerance -0.447. SoCalGas audit notes indicate this location was <b>not read during the SED inspection.</b>
BRA REC 10	I	El Centro	-0.802	-0.802	4/10/2018	100mV polarization shift area, lower tolerance -0.433, <b>read UP</b> on audit, may have been confused with Point L
BRA REC 10	M	El Centro	-0.686	-0.687	4/10/2018	100mV polarization shift area, lower tolerance -0.429, <b>read UP</b> on audit
BRA REC 10	J	El Centro	-0.613	-0.613	4/10/2018	100mV polarization shift area, lower tolerance -0.452, <b>read UP</b> on audit
BRA REC 10	K1	El Centro	-0.676	-0.676	4/10/2018	100mV polarization shift area, lower tolerance -0.425, <b>read UP</b> on audit
BRA REC 10	O	El Centro	-0.701	-0.701	4/10/2018	100mV polarization shift area, lower tolerance -0.526, <b>read UP</b> on audit

CP10 Location	District	Read, V	UP Read	UP Date	SCG Comments
71384 Hwy 111, Rancho Mirage	Palm Desert	-0.603	-1.435	4/5/2018	Found loose clamp holding Anode Wire. Installed new Anode and Clamp.
71499 Estellita Dr., Rancho Mirage	Palm Desert	-0.364	-1.244	4/5/2018	Installed Anode
195 E. Main St., Heber	El Centro	-0.842	N/A	N/A	Service replaced 6/1/18.
162 E. Main St., Heber	El Centro	-0.829	Pending	Pending	Read was -.839 per audit notes. Service to be replaced. WO 54/253946 on contractor line-up with start date of 8/20/18

For the locations identified as 'Pending' above, SoCalGas will provide a status update to SED once construction activity has been completed.

**SED's Conclusion:**

SED has reviewed and accepted actions taken by SCG.