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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-F Comprehensive Operation and Maintenance Inspection of Southern California Gas Company's (SoCalGas) 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, Yucca Valley and Blythe Distribution districts within the Inspection Unit.

SED staff identified one probable violation and noted one area of concern. Attached are 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:	Matt Epuna	SED/GSRB
	Kan Wai Tong	SED/GSRB
	Durga Shrestha	SED/GSRB
	Kelly Dolcini	SED/GSRB

**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 The SCG's Inspection Unit confirmed that the GIS map was outdated.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).

RESPONSE:

SoCalGas' official records 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.

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.

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	
IND WEL REC 3	H	Palm Desert	-0.796	-0.929	4/10/2018	Watered anode bed, area responded. 52/1813072
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 not read during the SED inspection.
BRA REC 10	I	El Centro	-0.802	-0.802	4/10/2018	100mV polarization shift area, lower tolerance -0.433, read UP 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, read UP on audit
BRA REC 10	J	El Centro	-0.613	-0.613	4/10/2018	100mV polarization shift area, lower tolerance -0.452, read UP on audit
BRA REC 10	K1	El Centro	-0.676	-0.676	4/10/2018	100mV polarization shift area, lower tolerance -0.425, read UP on audit
BRA REC 10	O	El Centro	-0.701	-0.701	4/10/2018	100mV polarization shift area, lower tolerance -0.526, read UP 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.