

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 21, 2021

GI-2020-08-SCG-40-04

Rodger Schwecke, Senior Vice President  
Southern California Gas Company  
Gas Operations and System Integrity  
555 W 5<sup>th</sup> Street, GT21C3  
Los Angeles, CA 90013

**RE: SED Closure Letter for the General Order (G.O.) 112-F Inspection of Southern California Gas Company's Emergency Response Program**

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Southern California Gas Company's (SCG) response letter dated November 23, 2020 for the findings identified during the G.O. 112-F Inspection of the Emergency Response Program. This inspection of the operator's Emergency Response Program was conducted from August 3-7, 2020. SED reviewed records remotely during this inspection due to COVID-19 and California Governor Newsom's Executive Order N-33-20 ("Safer at Home, Stay at Home"), shelter in place, and social distancing guidelines.

A summary of the inspection findings documented by the SED, the operator's response to the findings, and SED's evaluation of the operator's response for each finding is outlined in SED's summary of inspection findings.

This letter serves as the official closure of the 2020 Emergency Response Inspection.

Thank you for your cooperation in this inspection. If you have any questions, please contact Michelle Wei at (213) 620-2780 or by e-mail at [miw@cpuc.ca.gov](mailto:miw@cpuc.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Matthewson Epuna", written over a circular stamp or seal.

Matthewson Epuna  
Program & Project Supervisor  
Gas Safety & Reliability Branch  
Safety and Enforcement Division

CC: Troy Bauer, SCG  
Kan Wai Tong, GSRB/SED  
Claudia Almengor, GSRB/SED  
Michelle Wei, GSRB/SED  
Terence Eng, GSRB/SED

## Summary of Inspection Findings 2020 Emergency Response Inspection

**Dates of Inspection:** August 3-7, 2020

**Operator:** SOUTHERN CALIFORNIA GAS CO

**Operator ID:** 18484 (primary)

**Inspection Systems:** SCG Emergency Response Program

**Assets (Unit IDs):** GI-2020-08-SCG-40-04

**System Type:** GT

**Inspection Name:** SCG Emergency Response Program

**Lead Inspector:** Michelle Wei

**Operator Representative:** Alex Hughes, Austin Walker

## Unsatisfactory Results

*No Preliminary Findings.*

## Concerns

### A. Emergency Preparedness and Response : Emergency Response (EP.ERG)

Question Text Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?

References 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)

Assets Covered GI-2020-08-SCG-40-04 (SCG ER)

Issue Summary SED reviewed records of SCG liaison with first responders throughout their service territory. While SCG does record if a first responder declines to meet with them for the annual informational meeting, they do not record the attempts to meet with these parties or to invite them to emergency exercises. SED recommends that SCG document each attempt that they make to reach out to a first responder or agency so that they can show that they made their best effort to communicate with them.

### Operator's Response:

The Emergency Management organization acknowledges SED's recommendation and will take the below corrective action measures to better enhance our program as we know having a comprehensive documentation and record keeping system in place is important.

**Operator's Corrective Action:**

Emergency Management (EM) plans to implement the following enhancements to their documentation process:

- EM will document cold calling stating whether participant accepted, declined or received no response regarding participating in exercises and drills. EM will also send a follow up email with an attached delivery and read receipt confirming the response received.
- EM will document all participants in exercises/drills through a sign-in sheet all attendees are required to fill out.
- EM will conduct surveys anonymously to solicit feedback for strengths and areas of opportunity.
- After emergency exercises, EM will compose all data to produce an After-Action Report/Improvement Plan, documenting the following:
  - Exercise Name, Exercise Date and Time, Scope, Participants, Strengths, Areas of Improvement, Analysis, Improvement Plan

All documentation will be stored on the SharePoint platform or other designated repository platforms.

**SED's Conclusion:**

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