Troy A. Bauer
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7/3/2019

Dennis Lee, P.E.
Program & Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Dear Mr. Lee:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112, Operation and Maintenance Inspection of Southern California Gas Company's (SoCalGas) Mountain Pass Distribution Area from April 8, 2019 to April 19, 2019. The inspection included a review of both companies' written O&M procedures pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (CFR), Parts 191, 192 and 193

SED staff identified 2 probable violations and 5 areas of concern. Attached are Southern California Gas Company's (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:
Gordon Kuo, SED
Mahmoud Intably, SED
Kan-Wai Tong, SED
Claudia Almengor, SED

2019 SoCalGas Mountain Pass Distribution Area
4/8/2019 to 4/19/2019

Notice of Probable Violations

1. During the field inspection of valve #41-095 at Ramsey St / Woodland Ave, Banning, SED found that the valve was a steel gate valve. According to SCG's records on SCG's employee Mobile Data Terminal (MDT), it showed a 2-inch plastic gate valve with 7 turns to fully close the valve and the employee used the information on the MDT to perform the inspection. Subsequently, SCG's crew contacted Gas Engineering Department and confirmed that the valve is a 2-inch steel gate valve. SED found that SCG failed to update the valve information on its MDT and make it available to its crew during inspection. Therefore, SCG is in violation of G.O. 112-F, Reference Title 49 CFR Part 192, §192.605(a) and §192.605(b) (3).

   Response:

   SoCalGas confirmed that valve #41-095 was incorrectly identified in the SAP Asset Maintenance and Inspection system. As a result, the incorrect valve type was sent over to the MDT via CLICK mobile.

   Corrective Action:

   Immediately upon discovery of this discrepancy, SAP was corrected to change the valve attributes to reflect it is a steel gate valve. An SAP screen shot of valve attributes reflecting correct information is provided in the **Appendix**.

   SoCalGas recognizes the need to continuously develop tools and reports to help identify discrepancies within SAP. One effort recently completed was adding a link in the Enterprise Geographical Information System (EGIS) to all the valves that are listed in SAP. The effort added the valve's SAP equipment number to the pipeline attributes. SoCalGas will explore utilizing this tool identify discrepancies between the EGIS pipe type versus the valve material type listed in SAP.

2. During the field inspection of valve #41-163-7 at N. Hathaway St / Morongo Road, Banning, SED found that the MDT did not specify the number of turns needed to exercise the valve, resulting in a postponement of the valve inspection. SED found that SCG failed to provide its employee with the necessary instructions to perform the inspection. Therefore, SCG is in violation of G.O. 112-F, Reference Title 49 CFR Part 192, §192.605(a) and §192.605(b) (3).

   Response:

   Based on the information in the system, the crew had the available information to complete the order per Gas Standard 184.16 / *Valve Inspection and Maintenance – Distribution* section 4.2.2 GEAR OPERATED. Full valve operation is not conducted during the inspection. Thus, SoCalGas contends the number of turns needed to fully operate a valve is not required to complete the inspection . In the

event that a valve would need to be fully operated, the number of turns would be captured by the crew and documented. An SAP screen shot of valve attributes is provided in the **Appendix**.

SoCalGas records, as well as notes from the 2019 Mtn. Pass CPUC SED inspection, indicate the correct valve number located at N. Hathaway St./Morongo Rd. is #41-167-3. The valve is identified as a 4" gear operated ball valve.

Concerns

3. During the field inspection of SCG's Electric Pressure Monitoring system (EPM) at site ID#41291, SED found that SCG's Gas Standard 185.0466 Engineering Electronics Recorder and EPX-Installation, Inspecting and Calibration, Sections 16.12 and 16.13 did not provide adequate instructions on how to use the new instrument to perform inspection/testing on the EPM. SED recommends that SCG take the necessary steps to review/revise its Gas Standard to address SED's concern.

   Response:

   SoCalGas agrees with SED's recommendation to edit Gas Standard 185.0466.

   Corrective Action:

   SoCalGas Gas Standard 185.0466 / *Mercury Electronic Recorder and ERX – Installing, Inspecting and Calibration* has been edited to add new AM MTU language into section 15. SoCalGas still utilizes EPM's that have not been advanced to the AMI network and are currently on a land line or Verizon wireless network; therefore sections 16.2 of the Gas Standard remains unchanged. The enhanced description of MTU/DCU captures the base description and function of the wireless AM MTU Network as it applies to the EPM's. The Gas Standard is scheduled for publication on August 2019.

4. During field inspection, SED observed that the rectifier CAB REC 1 had two CP monitoring test stations that were not in compliance with -0.850 V criteria. SED recommends that SCG take remedial actions to address SED's concern.

Response:

SoCalGas agrees that read points "E" and "D" were identified as reading out-of-tolerance on April 16, 2019.

Asset # Location ID	Read Point	Type Area (Mag or Imp)	Read	Results
CAB REC 1	A	Imp	51.05 V	Within Tolerance
	B	Imp	0.156 A	Within Tolerance
	F	Imp	-0.871	Within Tolerance
	E	Imp	-0.718	Out of Tolerance
	D	Imp	-0.827	Out of Tolerance

Corrective Action:

SoCalGas began troubleshooting CAB REC 1 on April 17, 2019. During troubleshooting activity, it was determined that a new anode bed was required. SAP Notification #30146087 was initiated, and a new anode bed was installed on May 13-14, 2019. The new anodes were tied into the rectifier on May 15, 2019 and the area was allowed to polarize. On May 22, 2019 the Cathodic Protection (CP) area was read within tolerance with the following reads being recorded:

Asset # Location ID	**Read Point**	**Read**
CAB REC 1	A	13.83 V
	B	0.480 A
	F	-1.331
	E	-1.103
	D	-1.427
	C	-1.258
	J	-1.216
	I	-1.253
	H	-1.127
	G	-1.215

5. During the field inspection, SED observed that an aboveground customer Meter Set Assembly (MSA) -Aluminum case meters was touching/in contact with dirt at test station location's CVLY7 CP point read A and at 35438 Wildwood Canyon Rd. SCG's Gas Standard 185.0001 Condition/Location of Meter Installation and Report of Inaccessible/Removed Meters, Section 3.7 requires this potentially hazard condition to be addressed and corrected. SED recommends that SCG take remedial action to address SED's concern.

Response:

Condition/Location of Meter Installation and Report of Inaccessible/Removed Meters is SoCalGas standard 140.04, which is a Meter Reading Gas Standard and is not a required Gas Standard for Gas Operations.

According to SoCalGas CP records, as well as notes from the 2019 Mtn. Pass CPUC SED inspection, the correct address for CVLY7 read point "A" is 38961 Lewis Ct. in Cherry Valley. Additionally, Gas Standard 185.0001 is titled *Meter Location* **and not** *Condition/Location of Meter Installation and Report of Inaccessible/Removed Meters* as referenced by SED. Additionally, Gas Standard 185.001 makes no reference to MSAs in contact with the ground.

Corrective Action:

SoCalGas acknowledges that CP employees conducting field activities that involve observing a customer above ground MSAs should understand the need to identify, report and when possible correct a potential unsatisfactory condition. SoCalGas will share this information with Gas Operations System Protection employees system wide. A SoCalGas technician immediately cleared the dirt from below the MSA during the inspection.

6. During the field inspection, SED observed SCG's employee performing a leak survey. SED made him aware of an MSA touching/in contact with dirt. In addition, he failed to take the necessary steps to the address this condition as an AOC described in SCG's Gas Standard 223.0100, Leakage Surveys, Section 7, that requires a leak surveyor to issue order for corrective actions. SED recommends that SCG take the necessary steps to ensure its employees adhere to its Gas Standards when performing O&M activities.

Response:

SoCalGas disagrees with SED's interpretation that the employee failed to follow GS 223.0100 / *Leakage Surveys* Section 7- **Records**. There is no reference to a requirement to issue a follow-up order within this section of the Gas Standard. Section 7 of the identified Gas Standard references the records to be documented as it relates to leaks identified during the leak survey, completing the leak survey order in the Mobile Data Terminal (MDT), instructions for completing the paper survey map, and record retention requirements for leakage survey. The SoCalGas technician successfully completed the leakage survey via his MDT and successfully documented the leak survey on the paper map.

Furthermore, an Abnormal Operation Condition (AOC) was not at issue. Section 4.11 / ***Abnormal Operating Conditions*** of Gas Standard 223.0100 references that a meter that is "buried" in earth is an AOC. The meter observed during the audit was not "buried" at the time of the inspection and was only observed to be "touching" the bottom of the meter.

Corrective Action:

SoCalGas does acknowledge that the survey technician could take note of these types of conditions to prevent the meter from potentially becoming buried in the future. The individual technician, and the San Bernardino gas operations employees, were reminded of their responsibilities in recognizing and reporting AOCs while conducting leak surveys per Gas Standard 223.0100 Section 4.11. Additionally, SAP work order #5200002068733 was issued for the address of 35451 Wildwood Canyon to raise the meter. This work was completed on April 18, 2019. See picture attached in **Appendix.**

7. During the field inspection, SED observed that vault #1312 had cracks on the concrete walls within a regulating station. In addition, the vault's cover/lid had a broken spring support. SCG's Gas Standard 223.0210, Vault Maintenance and Inspection, Section 4.6, requires employees to contact the Mechanical, Civil and Structural Design Group in Engineering Design to assess the integrity of the structural condition of the vault for such conditions. SED recommends that SCG take remedial actions to address SED's concerns.

Response:

SoCalGas recognized the conditions identified by SED. However, the conditions identified within the vault were considered minor cracks and did not warrant contacting the Mechanical, Civil and Structural Design Group in Engineering Design. There was no exposed rebar or presence of large crushed concrete, as provided in Section 4.6:

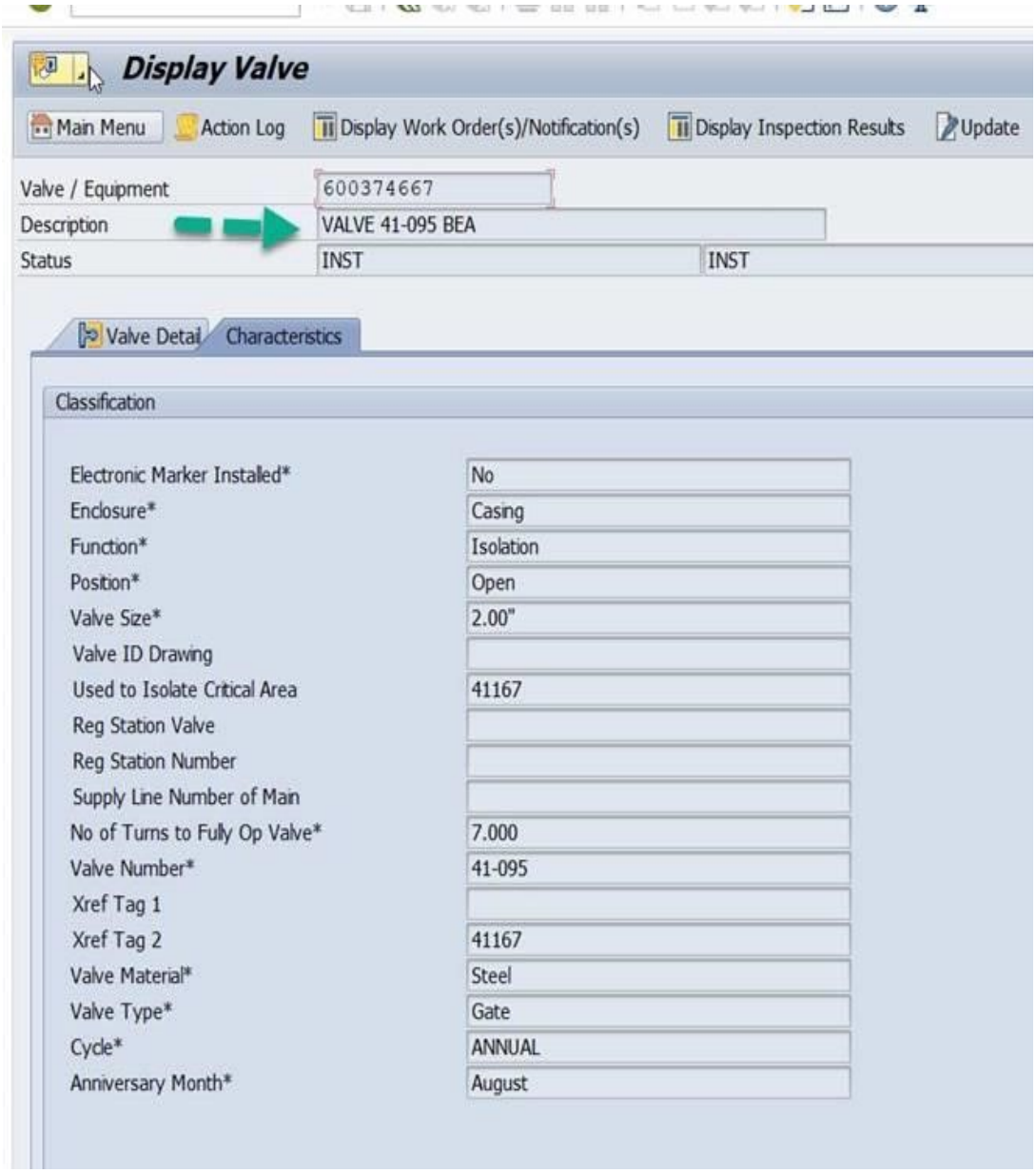
> 4.6. Check structural condition of vault, including cracks, crumbling concrete, crushed concrete, exposed rebar or evidence of foundation settlement or rood deformation. If there is any exposed rebar or large crushed concrete, contact the Mechanical, Civil and Structural Design Group in Engineering Design.

Corrective Action:

SoCalGas takes the safety of their employees and assets very seriously and SAP Work Order 540000329706 was initiated to replace the vault lids and repair the crack on the vault wall. On June 10, 2019 a third-party construction crew replaced the lids and patched the vault wall. Pictures of completed work can be found in the **Appendix**.

Appendix

Valve 41-095 SAP Attributes



Display Valve

Main Menu | Action Log | Display Work Order(s)/Notification(s) | Display Inspection Results | Update

Valve / Equipment	600374667	
Description	VALVE 41-095 BEA	
Status	INST	INST

Valve Detail | Characteristics

Classification

Electronic Marker Installed*	No
Enclosure*	Casing
Function*	Isolation
Position*	Open
Valve Size*	2.00"
Valve ID Drawing	
Used to Isolate Critical Area	41167
Reg Station Valve	
Reg Station Number	
Supply Line Number of Main	
No of Turns to Fully Op Valve*	7.000
Valve Number*	41-095
Xref Tag 1	
Xref Tag 2	41167
Valve Material*	Steel
Valve Type*	Gate
Cycle*	ANNUAL
Anniversary Month*	August

Valve 41-167-3 SAP Attributes

Display Valve

Main Menu | Action Log | Display Work Order(s)/Notification(s) | Display Inspection

Valve / Equipment	602863765	
Description	VALVE 41-167-3 BEA	
Status	INST	INST

Valve Detail | Characteristics

Classification

Electronic Marker Installed*	No
Enclosure*	Other
Function*	Supply Line - Non Critical
Position*	TBD
Valve Size*	4.00"
Valve ID Drawing	
Used to Isolate Critical Area	
Reg Station Valve	
Reg Station Number	
Supply Line Number of Main	41-167
No of Turns to Fully Op Valve*	
Valve Number*	41-167-3
Xref Tag 1	
Xref Tag 2	
Valve Material*	Steel
Valve Type*	Ball
Cycle*	ANNUAL
Anniversary Month*	February

38961 Lewis Ct. / Dirt cleared from below MSA

<u>35451 Wildwood Canyon / Raised MSA</u>

ID #1312 – New lids and patched walls