

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

November 2, 2022

GI-2022-09-SCG-62-02ABC

Mr. Rodger Schwecke
Senior Vice President and Chief Infrastructure Officer
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a **General Order (G.O.)112-F Comprehensive Operation and Maintenance Inspection of Southern California Gas Company (SoCalGas)'s Southeast Mountain Pass Natural Gas Distribution Districts (Inspection Unit)**, starting September 19 through September 23 of 2022 for calendar years 2019 through 2021 and additionally, calendar years 2017 through 2018 for Fontana distribution district. 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 reviewed records and conducted field inspections of SoCalGas pipeline facilities in the Beaumont, Fontana, Rimforest and San Bernardino distribution districts within the Inspection Unit. Also, SED's staff reviewed SoCalGas' Inspection Unit Operator Qualification program, which included field observations of randomly selected individuals performing covered tasks.

SED's staff identified zero (0) violations of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, and identified two (2) areas of concern which are described in the attached "Post-Inspection Written Preliminary Findings".

Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by SoCalGas to address the concerns noted in the "Post-Inspection Written Preliminary Findings".

Thank you for your cooperation in this inspection. If you have any questions, please contact Randy Holter, Senior Utilities Engineer (Specialist), at (213) 576-7153 or by email at randy.holter@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng".

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Attachments: see Post-Inspection Written Preliminary Findings
cc: see next page

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Safety and Enforcement Division

Post-Inspection Written Preliminary Findings

Date of Transmittal: 10/31/2022

Dates of Inspection: September 19 - 23, 2022

Operator: SOUTHERN CALIFORNIA GAS CO

Operator ID: 18484 (primary)

Inspection Systems: SoCalGas Distribution **Area:** Southeast - Mountain Pass - Operations and Maintenance records review, and Beaumont, Fontana, Rimforest and San Bernardino field procedures observations.

Assets (Unit IDs) with results in this report: D: Southeast - Mountain Pass (87045)

System Type: GT

Inspection Name: SoCalGas Distribution: SE - Mountain Pass - 2022

Lead Inspector: Randy Holter PE

Operator Representative: Edwin Baires, Frank Santa Cruz

Unsatisfactory Results

No Preliminary Findings.

Concerns

Records: Operations and Maintenance (PRR.OM)

Question Title, ID Maintenance of Equipment Used in Joining of Plastic Pipe by Heat Fusion, MO.GM.EQUIPPLASTICJOINT.R

Question 36. Do records indicate equipment used in joining plastic pipe by heat fusion was maintained in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?

References 192.603(b) (192.756)

Assets Covered Southeast - Mountain Pass (87045 (62))

Issue Summary During Mountain Pass Area baseline records review, SoCalGas records did not indicate whether equipment used in joining plastic pipe by heat fusion was maintained in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce

acceptable joints. Specifically, there were no calibration records associated with Project Notification (PN) # 2041620932.

SED stated its concern to SoCalGas, as 192.603(b) requires records of all procedures listed in 192.605 including 192.756.

Per SoCalGas, there are no requirements for taking pictures or other methods of capturing and maintaining records of equipment used in joining plastic pipe by heat fusion. While SoCalGas and SED acknowledge that SoCalGas Gas Standard 184.0130 requires employees to use approved and calibrated IR thermometers, SED notes there is no method outlined in the written procedures to keep track of which IR thermometer was used for a given project.

Without the ability to track IR thermometers used in each construction project, the IR thermometers' calibration records cannot be provided for review. Accordingly, IR thermometer calibration records were not provided for review during the inspection for projects such as PN # 2041620932.

SED requested in data request DR-019 for SoCalGas to provide maintenance records of the equipment used in joining plastic pipe by heat fusion in accordance with the manufacturer's recommended practices for PN # 2041620932.

SCG responded to SED DR-019, stating:

“SoCalGas continues to explore both interim and longer- term solutions to capture information related to plastic joiners and type of joints. Identifying and selecting a viable solution includes many considerations. Some of which include technology reviews, training requirements, changes/impacts to current workforce procedures, overall risk analysis, deployment options and system sustainability with increased data entry/storage. Another key discussion topic revolves around data security/accuracy being that non-SoCalGas/SDG&E employees (contractors) who perform these tasks, will also be involved with this new solution. SoCalGas/SDG&E will continue our discovery and planning efforts and report back with a status update to SED by end of year (2022)”.

SED recommends SoCalGas to develop and implement record keeping requirements to identify and record specific information (e.g., capital tool number, calibration date) for calibrated equipment used in any given plastic pipe joining project, such as an additional or modified project form for matching said equipment to specific PN plastic pipe joining records or another set of PN records.

Pipeline Field Inspection: Pipeline Inspection (Field) (FR.FIELDPIPE)

Question Title, ID Atmospheric Corrosion Monitoring, TD.ATM.ATMCORRODEINSP.O

Question 27. Do field observations indicate that pipe exposed to atmospheric corrosion is properly coated?

References 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), 192.481(d))

Assets Covered Southeast - Mountain Pass (87045 (62))

Issue Summary During Fontana District pipeline span survey on September 23, 2022 @ South Mount Vernon Bridge 205, Colton, SED observed atmospheric corrosion at distance in various locations at pipe supports. The pipe supports appeared to be loose or not in contact with the pipe. SoCalGas field technician stated to SED that he inspected the span six months ago and submitted a Pipeline Condition Maintenance Report (PCMR) to initiate remediation work.

Title 49 CFR, Part 192, §192.481(c) states:

(b) During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under dis-bonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water

(c) If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by § 192.479.

Title 49 CFR, Part 192, §192.479(a) states in part:

Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere,

Per SoCalGas Gas Standard (GS) 184.12 – Inspection of Aboveground Pipelines and Pipelines on Bridges and Spans, Section 1.2.1.1, Distribution pipeline spans, pipe supported on bridges, above ground (or jacketed) pipelines, and all other exposed pipeline (as installed) are inspected for atmospheric corrosion once every two (2) calendar years. Distribution Field Supervisors will review all inspection information when any condition is found by a “yes” answer on the “Bridge and Span Inspection Checklist” (Section 2.4.1.), generate and follow up any maintenance or repair work noted during the inspection, and ensure remedial action (Section 2.7) work orders and follow up orders as required. All orders for any remedial action must be issued within 30 days and completed within 90 days (Section 2.8).

SED requests SoCalGas provide a remediation plan to address work order anomalies identified in last two inspections of its pipelines on South Mount Vernon Bridge 205. Further, SED requests SoCalGas provide inspection checklists, repair orders for remedial action and completion documentation for South Mount Vernon bridge 205.