

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 18, 2022

GI-2022-06-SCG-63-02ABC

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 SE Inland South Distribution Area (Inspection Unit)** on June 13 through June 17, 2022. 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. The inspection included a review of SoCalGas' records from calendar years 2018 to 2021 and field inspections of pipeline facilities in the Murrieta and Ramona Distribution Districts. SED's staff also reviewed the implementation of the Operator Qualification program, which included field observation of randomly selected individuals performing covered tasks.

SED's staff identified two (2) probable violations of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, and noted three (3) areas of concern which are described in the attached "Post-Inspection Written Preliminary Findings".

Please provide a written response within 30 days of your receipt of this letter indicating the measures taken by SoCalGas to address the violation and concerns noted in the "Post-Inspection Written Preliminary Findings".

Thank you for your cooperation in this inspection. If you have any questions, please contact Gordon Huang, Utilities Engineer, at (213) 503-5083 or by email at ghg@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

cc: Alex Hughes, SoCalGas
Gwen Marelli, SoCalGas
Mahmoud (Steve) Intably, SED/GSRB
Kan-Wai Tong, SED/GSRB
Gordon Huang, SED/GSRB
Claudia Almengor, SED/GSRB

Post-Inspection Written Preliminary Findings

Dates of Inspection: 6/13/2022 – 6/17/2022

Operator: SOUTHERN CALIFORNIA GAS CO

Operator ID: 18484 (primary)

Inspection Systems: Murrieta, Ramona Distribution Districts

Assets (Unit IDs) with results in this report: Southeast - Inland South (87046)

System Type: GD

Inspection Name: SoCalGas SE Distribution - Inland South

Lead Inspector: Gordon Huang

Operator Representative: Edwin Baires

Unsatisfactory Results

Design and Construction : Meters, Service Regulators, and Service Lines (DC.METERREGSVC)

Question Title, ID Customer Meters and Regulator Location, DC.METERREGSVC.CUSTOMETERREGLOC.O

Question 1. Are meters and service regulators being located consistent with the requirements of 192.353?

References 192.351 (192.353(a), 192.353(b), 192.353(c), 192.353(d))

Assets Covered Southeast - Inland South (87046 (63))

Issue Summary On June 15, 2022, during a field inspection for aboveground corrosion, SED found the Meter Set Assemblies (MSAs) located at [REDACTED] Menifee were subject to but missing protection against vehicular damage. In addition, on June 16, 2022, during a field inspection for gas leak survey (Map RCO4134), SED found the MSA located at [REDACTED] Perris that was also subject to but missing protection against vehicular damage.

Therefore, SED finds SoCalGas to be in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.353(a).

Update 1: On June 28, 2022, SoCalGas' response stating that bollards and meter guards were installed at [REDACTED] Menifee and [REDACTED] Perris, respectively. Pictures and a supporting document were provided as evidence of SoCalGas' remediation efforts. SED has reviewed SoCalGas' response and accepts the remediation that it has articulated and implemented. No further response is required by SoCalGas.

Time-Dependent Threats : External Corrosion - CP Monitoring (TD.CPMONITOR)

Question Title, ID Cathodic Protection Monitoring, TD.CPMONITOR.TEST.R

Question 4. Do records adequately document cathodic protection monitoring tests have occurred as required?

References 192.491(c) (192.465(a))

Assets Covered Southeast - Inland South (87046 (63))

Issue Summary During record reviews, SED identified several separately protected short sections of mains or services (CP10) assets where SoCalGas did not monitor in a timely manner: (i) GD.INL.RMN.SH.00280425, (ii) GD.INL.RMN.SH.00280426, (iii) GD.INL.RMN.SH.00094115, (iv) GD.INL.RMN.SH.00094127.

1. SoCalGas took monitoring readings from CP10 assets (i)(ii) in 2005 and migrated to a different Atlas sheet. SoCalGas took monitoring readings in 2018.
2. SoCalGas never read CP10 (iii)(iv) prior to 2021;

Though services (i)(ii) and (iv) are currently abandoned, SoCalGas failed to conduct cathodic protection monitoring on the forementioned assets in a timely manner such that their entire systems were tested in each 10-year period. Therefore, SED finds SoCalGas to be in violation of G.O. 112-F, Title 49 CFR, Reference Part 192, §192.465(a).

Concerns

Maintenance and Operations : Gas Pipeline Maintenance (MO.GM)

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

Question 16. 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 - Inland South (87046 (63))

Issue Summary SoCalGas was unable to provide specific calibration records for equipment used in joining plastic pipe by heat fusion for Work Order #2041732202. SoCalGas personnel only assumed its crew used adequate equipment to perform the heat fusion joints but could not provide any records to show what equipment was used for any joints. Therefore, SED recommends SoCalGas to add a section in each work order to record the heat fusion equipment and their maintenance/calibration history where applicable.

Time-Dependent Threats : Atmospheric Corrosion (TD.ATM)

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

Question 3. Do records document inspection of aboveground pipe for atmospheric corrosion?

References 192.491(c) (192.481(a), 192.481(b), 192.481(c))

Assets Covered Southeast - Inland South (87046 (63))

Issue Summary During the record reviews, SED discovered that the following MSA's aboveground corrosion inspection records (e.g., Operations & Maintenance Orders (OMOs), Gas Service Orders (GSOs), etc.) were missing:

District	Work Order (WO)	Location	Gas Network Node (GNN)
MUR	0281492914	██████████ LAKE ELSINORE	674236200
MUR	0168189998	██████████ LAKE ELSINORE CA 92530	1241237400
RAM	1568861504	██████████ MENIFEE CA 92585	1092577500
RAM	0658022514	██████████ HEMET CA 92543	1542257600

Update 1: On 6/28/22 and 7/29/22, SoCalGas responded to SED's DR-016 and provided DART and As-Built Smart Form records for the requested MSAs. SED has reviewed SoCalGas' response and accepts the records that show the compliance of this code section. No further response is required by SoCalGas.

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

Question 4. 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))

Assets Covered Southeast - Inland South (87046 (63))

Issue Summary 1) During the inspection of Span S205 in the Murrieta district on 6/15/22, SED and SoCalGas Energy Technician - Distribution (ETD) 49297 observed tape wrap damage on the S/E end of the span. SED requested SoCalGas to follow up on the observed conditions and provide (i) remediation records (e.g., OMO, MMO, etc.) and (ii) pictures of the remediated conditions.

Update 1: Per SoCalGas' response dated 6/28/22, SoCalGas rewrapped the damaged tape wrap on 6/22/22 per WO 520003080238.

SED has reviewed SoCalGas' responses and accepts the corrective actions that it has articulated and implemented. SED may elect to re-evaluate these findings in future inspections and/or compliance activities. No further response is required by SoCalGas.

2) SED was unable to field confirm some Ramona-Hemet and both Murrieta Meter Set Assemblies (MSAs) due to access/logistical issues. Subsequently, SED requested SoCalGas to complete the inspections and provide supporting documents, e.g. reports, pictures, etc, for their findings:

Update 1: Per SoCalGas' responses dated 6/28/22, 7/29/22, 8/18/22, and 8/29/22, SoCalGas completed the inspections on all requested MSAs and addressed their findings as follows:

- A bollard was installed at [REDACTED] Menifee on 6/20/22.
- A meter guard was installed at [REDACTED] Hemet on 7/20/22 per WO 540000510961.
- Residential Meter Protection Program (RMPP) determined on 6/20/22 that the MSA at [REDACTED] Lake Elsinore is not located near a driveway/roadway.
- RMPP determined on 8/29/22 that the MSA at [REDACTED] Lake Elsinore did not require a meter guard based on (i) customer refusal and (ii) driveway usage for storage purposes only.

SED has reviewed SoCalGas' responses and accepts the corrective actions that it has articulated and implemented. SED may elect to re-evaluate these findings in future inspections and/or compliance activities. No further response is required by SoCalGas.

3) During aboveground corrosion inspections on 6/15/22 at [REDACTED] Menifee, SED and SoCalGas observed the wax pad was missing and aboveground corrosion had developed on the meter riser. SED requested SoCalGas to follow up on the observed conditions and provide (i) remediation records (e.g., OMO, GSO, SAP WO, etc.) and (ii) pictures of the remediated condition.

Update 1: Per SoCalGas' response dated 6/28/22, SoCalGas investigated this issue on 6/20/22, applied new wax coating and repainted the meter riser per WO 1167822720.

SED has reviewed SoCalGas' responses and accepts the corrective actions that it has articulated and implemented. SED may elect to re-evaluate these findings in future inspections and/or compliance activities. No further response is required by SoCalGas.

4) During leak survey inspections on 6/16/22 of Riverside County (RCO) 2469 in the Ramona district, SED and SoCalGas observed uncoated and signs of corrosion on some MSAs, e.g. [REDACTED]. SED requested SoCalGas to demonstrate by test, investigation, or experience appropriate to the environment of the pipeline that the corrosion observed on the meter sets was within compliance of §192.479 and SoCalGas Gas Standard (GS) 185.0228 and 185.0305.

Update 1: Per SoCalGas' response dated 7/12/22, SoCalGas confirmed that MSAs GNN 11013506 ([REDACTED]), 11025949 ([REDACTED]), and 10563148 ([REDACTED]) were recoated on 6/16/22 per WO# 1577381621, 1420475824, and 206061258.

SED has reviewed SoCalGas' responses and accepts the corrective actions that it has articulated and implemented. SED may elect to re-evaluate these findings in future inspections and/or compliance activities. No further response is required by SoCalGas.