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June 23, 2023

Mr. Terence Eng, P.E.,
Program Manager, Gas Safety and Reliability Branch,
Safety and Enforcement Division,
California Public Utilities Commission,
505 Van Ness Ave, 2nd Floor
San Francisco, CA 94102

Dear Mr. Eng:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) conducted a **General Order (G.O) 112-F inspection of Southern California Gas Company (SoCalGas) SE Desert Valley Distribution Area (Inspection Unit)** on April 10 through 14, 2023 and April 17, 2023. SED staff reviewed maintenance activities records for the period of January 1, 2018 through December 31, 2022, and field inspections of a representative sample of the SoCalGas' facilities in El Centro, Blythe, Palm Desert, and Yucca Valley districts.

SED staff did not identify any probable violations of G.O. 112-F, Reference Title 49 CFR, Parts 191& 192, but noted three (3) areas of concern. Please find SoCalGas' written responses below.

Please contact Alex Hughes at (213) 671-1344 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", with a long horizontal flourish extending to the right.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

CC:

Larry Andrews, SoCalGas
Mahmoud Intably, GSRB
Kan-Wai Tong, GSRB
Jordan Lin, GSRB
Claudia Almengor, GSRB

2023 SoCalGas Desert Valley Distribution Audit Response

Concern 1: Facilities and Storage: Facilities General (FS.FG)

Title 49, CFR Part 192, Section 192.749(a) states that:

"Each vault housing pressure regulating and pressure limiting equipment, and having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more, must be inspected at intervals not exceeding 15 months, but at least once each calendar year, to determine that it is in good physical condition and adequately ventilated."

SoCalGas Gas standard (GS) 223.0210 "Vault maintenance and inspection", Section 4.5 states:

"Check structural condition of the 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."

During the field inspection on April 14, 2023, SED observed vaults housing pressure regulating station (ID #0208) had large cracks and crushed concrete.

SED requests SoCalGas to contact the Mechanical, Civil and Structural Design Group in Engineering Design to assess the vaults' condition and take the necessary steps to ensure compliance with Title 49, CFR Part 192, Section 192.749(a).

SoCalGas Response:

On June 5, 2023, representatives from the Mechanical, Civil and Structural Design Group visited Regulator Station ID#0208IE. The final recommendation is pending. Based upon these finding, any recommended replacement or repairs will be evaluated and appropriate mitigative measures taken.

Concern 2: Maintenance and Operations: ROW Markers, Patrols, Leakage Survey and Monitoring (MO.RW)

Title 49, CFR Part 192, §192.723(b)(2) states:

"A leakage survey with leak detector equipment must be conducted outside business districts as frequently as necessary, but at least once every 5 calendar years at intervals not exceeding 63 months. However, for cathodically unprotected distribution lines subject to § 192.465(e) on which electrical surveys for corrosion are impractical, a leakage survey must be conducted at least once every 3 calendar years at intervals not exceeding 39 months."

During the field inspection on April 13, 2023, SED observed SoCalGas' employee performing a leakage survey at the intersection of Desert View Road and Paradise Way, Riverside County for compliance with §192.723 "Distribution Systems Leakage Survey", in accordance with SoCalGas Gas Standard 223.0100 "Leakage Surveys" and found a gas leak in the middle of the intersection. SoCalGas' employee coded the leak in accordance with SoCalGas Gas Standard 223.0126 "Above Ground leak Classification and Mitigation Schedules" and contacted dispatch for further investigation. SED requests SoCalGas to provide SED with a copy of its investigation in accordance with SoCalGas Gas Standard 184.0245 "Leak Investigation" including the leak Repair Order (Form 4050).

SoCalGas Response:

On April 13, 2023, SED observed a leak surveyor performing steps for leak survey. A new leak was found and later repaired on April 18, 2023. As requested, the order with the leak investigation and repair information is in the SoCalGas/CPUC SharePoint site.

Concern 3: Time-Dependent Threats: External Corrosion - CP Monitoring (TD.CPMONITOR)

Title 49, CFR Part 192, Section 192.463(a) states that:

"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 inspection on April 13 & 14, 2023, SED observed the following:

- Cathodic Protection (CP) Package RAM-13 with 100 millivolts polarization shift criterion and -0.485 volt minimum had pipe-to-soil read of -0.440 volt at Read Point B.
- CP package PSP REC3 with -0.85 volt criterion had the following pipe-to-soil reads:
 - Read Point "U" measured - 0.773 volt.
 - Read Point "Q" measured - 0.840 volt.
 - Read Point "T" measured - 0.786 volt.
- CP package YUC23 with -0.850 volt criterion, had the following pipe-to-soil reads:
 - Read point "A" measured -0.832 volt.
 - Read Point "D" measured -0.849 volt.
 - Read Point "G" measured -0.816 Volt.

SED recommends SoCalGas follow its GS 186.0135 "Operation and maintenance of Cathodic Protection Facilities" and take the necessary corrective measures to restore cathodic protection to the above CP packages to ensure compliance with Title 49, CFR Part 192, §192.463(a).

SoCalGas Response & Actions:

SoCalGas monitors its cathodic protection areas for satisfactory operations. When needed the Company will take actions to address unsatisfactory conditions such as out-of-tolerance conditions which were found during the audit. This process is outlined per Gas Standard, 186.0135, "Operations & Maintenance of Cathodic Protection Facilities."

Listed below is the status of the cathodic protection areas found out of tolerance on 4/14/2023 during the Audit:

CP Area Ram13 - Troubleshooting found no shorts but the area was deficient in current. Orders have been issued to install new anodes. The expected installation date is 6/30/2023.

CP Area PSP Rec3 - Troubleshooting of the area identified several above ground shorts that were cleared. The area was brought back within tolerance on 5/25/23.

CP Area Yuc 23 - Troubleshooting revealed that the area has depleted anodes. SoCalGas is applying for permits and work will be conducted when they are received. The estimated completion date is 9/2/2023.