

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

October 11, 2023

GI-2023-08-SCG-40-05-14

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

**Subject: G.O. 112-F Compliance Inspection of SoCalGas' DPP and PAP**

Dear Mr. Schwecke:

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's (SoCalGas) Damage Prevention Program (DPP) and Public Awareness Program (PAP) on August 7 through 14, 2023. SED staff reviewed SoCalGas' written programs, procedures, and associated records regarding its DPP for the period 2019 through 2022 and its PAP records for the period 2018 through 2022. In addition, SED staff conducted field observations of SoCalGas' pipeline locate and mark activities. SED utilized the Pipeline and Hazardous Materials Safety Administration's (PHMSA) Inspection Assistance (IA) software as a reference guide for this inspection.

SED's staff did not identify any probable violations of G.O. 112-F. However, SED's staff noted two (2) areas of concern, which are described in the attached "Post-Inspection Written Preliminary Findings" report.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by SoCalGas to address the concerns noted in the SED's Summary of Inspection Findings.

If you have any questions, please contact Sann Naing, Senior Utilities Engineer (Specialist) at (213) 266-4723 or by email at [sn1@cpuc.ca.gov](mailto:sn1@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: Sann Naing, SED/GSRB  
Matthewson Epuna, SED/GSRB  
Claudia Almengor, SED/GSRB  
Alex Hughes, SCG

# Post-Inspection Written Preliminary Findings

**Dates of Inspection:** August 7-14, 2023

**Operator:** SOUTHERN CALIFORNIA GAS CO

**Operator ID:** 18484 (primary)

**Inspection Systems:** SoCalGas Damage Prevention and Public Awareness Programs

**Assets (Unit IDs) with results in this report:** SoCalGas (88388 88391)

**System Type:** GT & GD

**Inspection Name:** 2023 SCG DP and PA

**Lead Inspector:** Sann Naing

**Operator Representative:** Edwin Baires

## Unsatisfactory Results

**No Preliminary Findings.**

## Concerns

### Public Awareness and Damage Prevention : Damage Prevention (PD.DP)

- 1) Question Title, Documented Damage Prevention Program - TPD, PD.DP.TPD.P ID

Question 4. Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?

References 192.614(c)(1)

Assets Covered SoCalGas (88388 (40A))

Issue Summary SoCalGas uses the number of damages per 1,000 USA tickets as one of its key observations in its internal annual Public Awareness Program audits. This parameter is used as one of the criteria by the Damage Prevention (DP) industry to measure the effectiveness of the DP program. The industry uses the data reported by the operators in their PHMSA annual reports. While it is good practice to look at this data, it is also important that the data used for this evaluation be consistent and accurate. SED noted that SoCalGas' 2022 Public Awareness Program annual report showed the total damages in 2022 to be 2545 while SoCalGas' annual PHMSA report (Form F7100-1) shows the total number of damages to be 2791. In addition, SoCalGas' annual report Form F7100-1 showed that, in 2022, SoCalGas received total of 1,104,907 tickets, but SoCalGas' ticket list for 2022, which was provided to SED during the inspection, showed total of 1,105,808.

Furthermore, during review of SoCalGas' annually reported data, SED noted that the damaged percentage related to "Locating Practices Not Sufficient" (percentage of total excavation damages) for 2022 has increased to 10% from 9% in 2021.

SED recommends that SoCalGas review and evaluate its records and data to identify the inaccuracies in its data. Also, SED recommends that SoCalGas drive the improvements in the identified areas.

On September 11, 2023, SoCalGas provided the following response:

*"SoCalGas will evaluate data sources to verify consistency, accuracy and opportunities for further improvement."*

SED would like to request a status update on SoCalGas' identification data deficiencies noted in SED's inspection findings.

2) Question Title, Damage Prevention Program, PD.DP.PDPROGRAM.R  
ID

Question 7. Does the damage prevention program meet minimum requirements specified in 192.614(c)?

References 192.614(c)

Assets Covered SoCalGas (88388 (40A))

Issue Summary SoCalGas gas standard procedure, 184.0200 Underground Service Alert and Temporary Marking, Section 4.6.20 states:

*"If previous company marks are visible within the delineated excavation location, the locator must attempt to verify those marks are accurate. Marks found to be inaccurate must be concealed. For example: Inaccurate marks on asphalt may be concealed with black paint. Notify supervisor if previous location marks for the same USA ticket appear to be marked at incorrect location."*

During the 2019 inspection of SoCalGas' Damage Prevention program, SED expressed its continued concern with SoCalGas' Damage Prevention program procedure, as currently written. The procedure did not have a process to capture and document inaccuracies. Without such a process, it will be difficult to determine the root cause of actual issues and how to remediate them. SED recommends that SoCalGas establish a process to follow and document the outcome that may pinpoint the root causes of inaccurate pipeline markings.

On September 11, 2023, SoCalGas provided the following response:

*"SoCalGas will develop a written process within its gas standard. SoCalGas will provide a copy of the gas standard once it is updated."*

SED would like to request a status update on SoCalGas' effort to develop a written process within its gas standard.