

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 28, 2023

GI-2023-10-SCG-40-06

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 Inspection of Southern California Gas Company's (SoCalGas) Anti-Drug and Alcohol Prevention Program (Inspection Unit) on October 9 through October 11, 2023. SED staff reviewed SoCalGas' written procedures and conducted a field observation pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (CFR), Parts 199 and 40. The inspection also included a review of SoCalGas' records from the calendar years 2019 to 2022.

SED's staff used the Pipeline and Hazardous Materials Safety Administration's (PHMSA), Office of Pipeline Safety's "Inspection Assistance" (IA) as a reference guide to conduct this inspection.

SED's staff did not identify any probable violations of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Parts 199 and 40, but noted one (1) area 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](mailto: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.

Alex Hughes, Pipeline Safety and Risk Mitigation Manager  
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Claudia Almengor  
Associate Governmental Program Analyst  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

# Post-Inspection Written Preliminary Findings

**Date of Transmittal:** 11/27/2023

**Dates of Inspection:** October 9 to October 11, 2023

**Operator:** SOUTHERN CALIFORNIA GAS CO (SoCalGas)

**Operator ID:** 18484 (primary)

**Inspection Systems:** Anti-Drug and Alcohol Prevention Program

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

SoCalGas' Main Office Inspection – Transmission (88388) 40A

SoCalGas' Main Office Inspection – Distribution (88391) 40B

**System Type:** DA

**Inspection Name:** SoCalGas Drug & Alcohol 2023

**Lead Inspector:** Randy Holter

**Operator Representative:** Edwin Baires, Linda Baker, Carlos Chavez

## Unsatisfactory Results

### No Preliminary Findings.

## Concerns

### **Drug and Alcohol : Alcohol Misuse Prevention Program (DA.ALCOHOL)**

Question Title, ID BAT/STT Alcohol Screening Test Reports,  
DA.ALCOHOL.SCREENINGTEST.P

Question 11. Does the process ensure that alcohol screening test results are reported as required to the DER?

References 40.247(a)

Assets Covered SoCalGas - DA - T - Procedures (Procedures (40A))

Issue Summary SED reviewed SoCalGas' *Drug and Alcohol Misuse Prevention Program Plan* (Plan), SECTION XII. ALCOHOL TESTING AND EQUIPMENT, Test procedure, which states in part:

*"If the screening test result is an alcohol concentration of less than 0.02, no further testing is authorized, and there is no DOT action to be taken."*

and Plan SECTION XIII. BREATH ALCOHOL TECHNICIAN (BAT) GUIDANCE, BREATH ALCOHOL TESTING PROCEDURES, D. Screening Test procedure, which states:

- “1. Step one requires the BAT to complete employee information (employee name, employee ID number, driver’s license or social security number, employer address and telephone number) and the test type.*
- 2. Step two requires the employee to sign the form or logbook certifying the information provided is true and correct. Failure to sign or initial shall not be considered a refusal to be tested and the BAT shall note the employee's failure to sign or initial in the remarks section.*
- 3. After the BAT attaches an individually sealed mouthpiece (opened in view of the employee) to the EBT, the BAT shall instruct the employee to blow forcefully into the mouthpiece until the EBT indicates adequate breath has been obtained.*
- 4. The EBT may print the results on the Alcohol Testing Form and the BAT shall show the employee the results displayed on the EBT. If results are not printed on the Form, the BAT will affix to the Form the test printout using a method that will provide clear evidence of removal.*
- 5. If the result of the screening test is an alcohol concentration of .02 or greater, a confirmation test shall be performed.”*

Title 49 CFR Part 40 §40.247(a) states:

*“If the test result is an alcohol concentration of less than 0.02, as the BAT or STT, you must do the following:*

- (1) Sign and date Step 3 of the ATF; and*
- (2) Transmit the result to the DER in a confidential manner, as provided in § 40.255.”*

The Plan failed to reference Title 49 CFR, Part 40, §40.247(a) and that the BAT or STT must sign and date Step 3 of the ATF, then transmit the result to the DER in a confidential manner if the alcohol screening test result is an alcohol concentration of less than 0.02. SED recommends that SoCalGas to reference in its Plan, Title 49 CFR, Part 40, §40.247(a), that alcohol screening test results must be signed, dated, and transmitted to the DER in a confidential manner, as provided in § 40.255.