

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



May 26, 2023

GI-2023-04-SCG-61-02

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) SE Desert Valley Distribution Area (Inspection Unit)** on April 10 through 14, 2023 and April 17, 2023. 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 January 1, 2018 through December 31, 2022 and field inspections of SoCalGas' pipeline facilities in El Centro, Blythe, Palm Desert, and Yucca Valley districts. SED's staff also reviewed the implementation of SoCalGas' Operator Qualification program, which included field observation of randomly selected individuals performing covered tasks.

SED staff did not identify any probable violations of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, but 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 receipt of this letter indicating the measures 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 Jordan Lin, Utilities Engineer, at (213) 248-5023 or by email at JRN@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
Pipeline Safety and Compliance
Southern California Gas Company
555 West 5th Street
Los Angeles, CA 90013

Larry Andrews, Emergency Strategy & Operations Manager
Southern California Gas Company
555 West 5th Street
Los Angeles, CA 90013

Mahmoud Intably, PE
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Kan-Wai Tong, PE
Senior Utilities Engineer (Supervisor)
Gas Safety and Reliability Branch
Safety and Enforcement Division

Jordan Lin
Utilities Engineer
Gas Safety and Reliability Branch
Safety and Enforcement Division

Claudia Almengor
Associate Governmental Program Analyst
Gas Safety and Reliability Branch
Safety and Enforcement Division

Post-Inspection Written Preliminary Findings

Date of Transmittal: 05/25/2023

Dates of Inspection: 04/10/2023 to 04/14/2023 and 04/17/2023

Operator: SOUTHERN CALIFORNIA GAS CO

Operator ID: 18484 (primary)

Inspection Systems: El Centro, Blythe, Palm Desert, and Yucca Valley Distribution Districts

Assets (Unit IDs) with results in this report: Southeast - Desert Valley (87044)

System Type: GD

Inspection Name: SoCalGas SE Distribution - Desert Valley

Lead Inspector: Jordan Lin

Operator Representative: Austin Walker, James Cervantes

Unsatisfactory Results

No Preliminary Findings.

Concerns

Facilities and Storage: Facilities General (FS.FG)

1. Question Title, ID	Vault Inspection, FS.FG.VAULTINSPECT.O
Question	4. Are inspections of selected vaults with internal volume =200 cubic feet (5.66 cubic meters) housing pressure regulating/limiting equipment adequate?
References	192.749(a) (192.749(b), 192.749(c), 192.749(d))
Assets Covered	Southeast - Desert Valley (87044 (61))
Issue Summary	Title 49, CFR Part192, 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).

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

2. Question Title, ID	Distribution Leakage Surveys, MO.RW.DISTPATROLLEAKAGE.R (also presented in: PD.RW)
Question	11. Do records indicate distribution leakage surveys were conducted as required?
References	192.603(b) (192.723(a), 192.723(b))
Assets Covered	Southeast - Desert Valley (87044 (61))
Issue Summary	Title 49, CFR Part192, §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).

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

3. Question Title, ID	Cathodic Protection Monitoring Criteria, TD.CPMONITOR.MONITORCRITERIA.O
Question	3. Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?
References	192.465(a) (192.463(b), 192.463(c), 192.463(a))
Assets Covered	Southeast - Desert Valley (87044 (61))
Issue Summary	Title 49, CFR Part192, 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:
 - o Read Point "U" measured - 0.773 volt.
 - o Read Point "Q" measured - 0.840 volt.
 - o Read Point "T" measured - 0.786 volt.
- CP package YUC23 with -0.850 volt criterion, had the following pipe-to-soil reads:
 - o Read point "A" measured -0.832 volt.
 - o Read Point "D" measured -0.849 volt.
 - o 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).