



Alex Hughes
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May 10, 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 comprehensive and full review inspection of San Diego Gas and Electric Company (SDG&E)'s Operation & Maintenance Procedures and Emergency Plan (OME Procedures Inspection)** on January 23 through 27 and January 30 through February 1, 2023. SED staff reviewed SDG&E's written OME procedures pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (CFR), Parts 191 & 192, and used the Pipeline and Hazardous Materials Safety Administration's (PHMSA) Inspection Assistance (IA) as a reference guide to conduct this inspection.

SED staff did not identify any probable violations of G.O. 112-F, Reference Title 49 CFR, Parts 191& 192, but noted seven (7) areas of concern within the Transmission and Distribution Procedures. Attached are SDG&E's written responses.

Please contact Alex Hughes at (949)697-2539 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", is written over a light blue rectangular background.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

CC:

Larry Andrews, SoCalGas
Mahmoud Intably, GSRB
Kan-Wai Tong, GSRB
Gordon Huang, GSRB
Claudia Almengor, GSRB

2023 SDG&E O&M Procedures and Emergency Plan Audit Response

Concern:

Assessment and Repair : Repair Methods and Practices (AR.RMP)

Question Title, ID	Safety While Making Repairs, AR.RMP.SAFETY.P
Question	1. Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?
References	192.605(b)(9) (192.713(b))
Assets Covered	SDG&E's Main Office Inspection - Distribution (88390 (53B))
Issue Summary	Following review of SDG&E Gas Standard (GS) G8365 - Respiratory Protection Program, SED recommends incorporating considerations for ensuring PPE is worn and checked with fit test compatibility during employee fit testing on the part of supervisors and employees. SDG&E clarified its process in DR-19 (received 1/31/2023) and proposed its revised procedural language. SED requests that the revised procedures be submitted for review after SDG&E has completed its revisions.

Response:

The revision was to be made to the SoCalGas GS 104.06 to align with the SDG&E Gas Standard G8365. The updated gas standard, 104.06, has been published and is available in the CPUC Gas Standard Library.

Concern:

Maintenance and Operations : Verification of Materials Properties (MO.RECONFMATV)

Question Title, ID	Material Verification - Line Pipe Program, MO.RECONFMATV.PROGRAM.P
Question	1. What is the process (or program) for determining and collecting material verification records for line pipe to meet the requirements of §§ 192.619(a)(4), 192.624, 192.607, and 192.712?
References	192.607 (192.613, 192.619, 192.624, 192.632, 192.712)
Assets Covered	SDG&E's Main Office Inspection - Distribution (88390 (53B))
Issue Summary	SED's review of SDG&E Gas Standards (GS) G7002 - Material Traceability for High-Pressure Systems prompted multiple inquiries regarding SDG&E's Material Traceability process and program, organizational tasks and responsibilities, and other

	minor documentation observations. These inquiries were relayed under DR-05 sent on 1/23/2023. As of 2/1/2023, SDG&E's response remains pending. SED requests that its inquiries be responded to and addressed by SDG&E, with procedural revisions where necessary, within a timely manner.
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Response:

Response to DR-05 was provided on 2/3/2023. The updated gas standard, G7002, has been published and is available in the CPUC Gas Standard Library.

Concern:

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

Question Title, ID	Cathodic Protection Criteria, TD.CPMONITOR.MONITORCRITERIA.P
Question	1. Does the process require CP monitoring criteria to be used that is acceptable?
References	192.605(b)(2) (192.463(a), 192.463(c))
Assets Covered	SDG&E's Main Office Inspection - Distribution (88390 (53B))
Issue Summary	<p>SED's review of SDG&E Standards (GS) G8002 - 100mV Polarization Criteria found minor instances where its written procedure did not align with its intended work processes:</p> <p>1) In §5.5.3.7, the procedure discusses taking measurements of the depolarized read to confirm the 100 mV criteria and requires that this be “repeated yearly”.</p> <p>2) In §§5.3.6.1 and 5.6.1, the procedure state close interval survey (CIS) may be performed on Transmission Lines, Distribution Supply Lines, and Storage Lines while establishing a 100mV polarization criteria. However, in §5.6.2, the procedure then requires a CIS to be performed for these pipeline facilities.</p> <p>SDG&E clarified in DR-15 (received 1/26/2023) the process incongruities and proposed its revised procedural language. SED requests that the revised procedures be submitted for review after SDG&E has completed its revisions.</p>

Response:

The updated gas standard will be published by the end of the month and will be made available in the CPUC Gas Standard library by June 1st, 2023.

Concern:

Generic Question, GENERIC.GENERIC.GENPROCEDURE.P

Question Title, ID	Generic Question, GENERIC.GENERIC.GENPROCEDURE.P
Question	1. Generic question - please provide context in result notes.
References	N/A
Assets Covered	SDG&E's Main Office Inspection - Distribution (88390 (53B))
Issue Summary	<p>SED recommends revising the following SDG&E Gas Standards</p> <ol style="list-style-type: none">1) Please consider incorporating the following references to the Gas Standards:<ol style="list-style-type: none">i) 49 CFR §192.453 for §2 of GS G8001ii) SDG&E GS G8029 in §6 of the GS G8001 (similarly to SDG&E GS G8003).2) Please consider defining the following terms in the Gas Standards:<ol style="list-style-type: none">i) "Pigtail" in GS D72473) Please consider the following process-specific revisions in the Gas Standards:<ol style="list-style-type: none">i) Specify the minimum distance between the service valve and bypass connection in GS D7247ii) Replace or revise Figures 1 and 2 in D7247 to emphasize the 1-inch elevation between the manufacturer red line from the final grade in GS D72474) For 49 CFR §192.313 - Bends and Elbows, §192.313(a)(1) states "a bend must not impair the serviceability of the pipe". SDG&E Gas Standard (GS) G7821 §1.5.1 mentions verifying that pipeline serviceability shall not be impacted during roping operations. This Code requirement includes field bends produced by roping, but is also broader in scope beyond roping. SDG&E acknowledged SED's finding (2/1/2023) and, per DR-22, proposes to revise the procedural language to better align with §192.313(a)(1). SED requests that the revised procedures be submitted for review after SDG&E has completed its revisions

Response:

For items 1) i-ii), The updated gas standard will be published by the end of the month and will be made available in the CPUC Gas Standard library by June 1st, 2023.

For items 2) i) and 3) i-ii), The updated gas standard, D7247, has been published and is available in the CPUC Gas Standard Library.

For item 4), The updated gas standard, G7821, has been published and is available in the CPUC Gas Standard Library.

Concern:

Cathodic Protection Monitoring Criteria, TD.CPMONITOR.MONITORCRITERIA.P

Question Title, ID	Miter joints, DC.WELDPROCEDURE.MITERJOINT.P
Question	4. Does the process prohibit the use of certain miter joints as required by 192.233?
References	192.303 (192.233(a), 192.233(b), 192.233(c))
Assets Covered	SDG&E's Main Office Inspection - Distribution (88390 (53B))
Issue Summary	<p>SED's review of SDG&E Gas Standard (GS) G7821 - Angles and Bends in Steel Piping prompted several inquiries and recommendations to better align SDG&E's process with §192.233 requirements (DR-22, 26).</p> <p>1. SDG&E GS D7247 -Service Risers for Polyethylene (PE) Installations §4.10.2.2 allows transition fittings to be mitered 45 degrees to fit field conditions as a last resort. The Figure 9 appears to depict a 90 degree joint. However, the verbiage does not explicitly prohibit the miter joint to deflect the pipe more than 90 degrees per §192.233. SED recommends SDG&E to revise GS D7247 to include this requirement.</p> <p>2. In addition, SED recommends SDG&E to include references to §192.233 in D7247 per Section 4.10.2.2.</p>

Response:

The updated gas standard, D7247, has been published and is available in the CPUC Gas Standard Library.

Concern:

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

Question Title, ID	Cathodic Protection Monitoring Criteria, TD.CPMONITOR.MONITORCRITERIA.P
Question	1. Does the process require CP monitoring criteria to be used that is acceptable?
References	192.605(b)(2) (192.463(a), 192.463(c))
Assets Covered	SDG&E's Main Office Inspection - Distribution (88390 (53B))

Issue Summary	<p>SED's review of SDG&E Standards (GS) G8002 - 100mV Polarization Criteria found minor instances where its written procedure did not align with its intended work processes:</p> <p>1) In §5.5.3.7, the procedure discusses taking measurements of the depolarized read to confirm the 100 mV criteria and requires that this be “repeated yearly”.</p> <p>2) In §§5.3.6.1 and 5.6.1, the procedure state close interval survey (CIS) may be performed on Transmission Lines, Distribution Supply Lines, and Storage Lines while establishing a 100mV polarization criteria. However, in §5.6.2, the procedure then requires a CIS to be performed for these pipeline facilities.</p> <p>SDG&E clarified in DR-15 (received 1/26/2023) the process incongruities and proposed its revised procedural language. SED requests that the revised procedures be submitted for review after SDG&E has completed its revisions.</p>
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Concern:

Generic Question, GENERIC.GENERIC.GENPROCEDURE.P

Question Title, ID	Generic Question, GENERIC.GENERIC.GENPROCEDURE.P
Question	2. Generic question - please provide context in result notes.
References	N/A
Assets Covered	SDG&E's Main Office Inspection - Distribution (88390 (53B))
Issue Summary	<p>SED recommends revising the following SDG&E Gas Standards</p> <p>1) Please consider incorporating the following references to the Gas Standards:</p> <ul style="list-style-type: none"> i) 49 CFR §192.453 for §2 of GS G8001 ii) SDG&E GS G8029 in §6 of the GS G8001 (similarly to SDG&E GS G8003). <p>2) Please consider defining the following terms in the Gas Standards:</p> <ul style="list-style-type: none"> i) "Pigtail" in GS D7247 <p>3) Please consider the following process-specific revisions in the Gas Standards:</p> <ul style="list-style-type: none"> i) Specify the minimum distance between the service valve and bypass connection in GS D7247 ii) Replace or revise Figures 1 and 2 in D7247 to emphasize the 1-inch elevation between the manufacturer red line from the final grade in GS D7247 <p>4) For 49 CFR §192.313 - Bends and Elbows, §192.313(a)(1) states "a bend must not impair the serviceability of the pipe". SDG&E Gas Standard (GS) G7821 §1.5.1 mentions verifying that pipeline serviceability shall not be impacted during roping operations. This Code requirement includes field bends produced by roping, but is</p>

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