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October 10, 2024

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 Inspection of Southern California Gas Company's (SoCalGas) Northwest-San Fernando Valley Natural Gas Distribution system Area** on July 15 thru 19, and July 22, 2024. This Area inspection covered SoCalGas' Canoga, Glendale, and Saticoy Distribution districts. The inspection included the review of SoCalGas' records for calendar years 2020 through 2023 and field inspections of selected pipeline facilities within the inspection area.

SED's staff identified one (1) probable violation of G.O. 112-F and noted one (1) area of concern.

Below is SoCalGas' written response.

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 stylized flourish extending to the right.

Alex Hughes  
Pipeline Safety and Risk Mitigation Manager

CC:  
Larry Andrews, SoCalGas  
Matthewson Epuna, SED/GSRB  
Sann Naing, SED/GSRB  
Claudia Almengor, SED/GSRB

## 2024 SoCalGas San Fernando Valley Distribution Audit Response

### Violation:

#### Time-Dependent Threats: Atmospheric Corrosion (TD.ATM)

§192.481(a) partially states:

*“Each operator must inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:*

<i><b>Pipeline type:</b></i>	<i><b>Then the frequency of inspection is:</b></i>
<i>(1) Onshore other than a Service Line</i>	<i>At least once every 3 calendar years, but with intervals not exceeding 39 months.</i>

*“*

SoCalGas installed the pipeline span **SKL72** (Function location: GD.NOR.SAT.BS.SKL72) in its Saticoy distribution district in August 2017. However, this span was never entered into the company’ inspection work management system. Consequently, SoCalGas failed to conduct the required 3-year Bridge and Span inspections from 2017 through 2023.

On August 7, 2024, SoCalGas provided the following information:

*“SoCalGas recognizes the need to perform timely inspections. In this case SoCalGas notified the commission in May 2024 of the missing inspection in the companies monthly Exception Self-Report. To address the missing inspections, and the original non-compliant event, SoCalGas made the corrective actions as below:*

*·System Update: In May of 2024, the SoCalGas Saticoy Distribution supervision reviewed installation records of the asset and concluded the asset did not appear in the districts Bridge and Span inspection list. Once found, the asset has been added to SoCalGas’s SAP system for future inspection.*

*·Site Inspections: In May when SoCalGas was made aware of the missing inspections. SoCalGas supervision dispatched a distribution crew to do a comprehensive inspection on the asset. Inspection revealed no Abnormal Operating Conditions, (AOCs).”*

SED reviewed the information that SoCalGas provided and acknowledged SoCalGas’ corrective action after it identified the error. However, SED believes that understanding the cause of the process failure and remediating the root cause of the failure is a better way to prevent reoccurrence. SED requests that SoCalGas investigate the reason for the process failure (entering a new pipeline span into its inspection work management program). SED request that SoCalGas provide its investigation result and prevention plan.

**SoCalGas Response & Actions:**

This span was installed in 2017 by a team dedicated to high-pressure pipeline projects that reside outside of Distribution. SoCalGas recognized that handoff of information between this department and Distribution Operations had gaps. As such, Gas Standard 192.0026, Records Management for High Pressure Project Closeout, was established on 9/1/2023. This standard requires that the project owner provide the asset owner with redline mark-ups and asset change forms. The recommended timeline is 90 days after the date of operation or sooner. The process improvements established in this new Gas Standard help prevent situations like this from occurring. In this case this project was performed before the updated process had been implemented.

SoCalGas will look at other projects performed by this high-pressure workgroup from this time period to identify if any other span had similar deficiencies. If so, SoCalGas will mitigate as appropriate.

**Concern:****Time-Dependent Threats: Atmospheric Corrosion (TD.ATM)**

During field inspection on 7/17/2024, SED visited the sites where a SoCalGas' field crew was performing the Bridge Span inspections and observed evidence of atmospheric corrosion on the pipeline span supports (BS) **BKJ21** (Functional location: GD.NOR.CNP.BS.BKJ21). The Span-**BKJ21** is underneath a bridge over the Los Angeles River and uses the hanger supports, hanging from the bottom of bridge. SoCalGas' inspection crew correctly identified evidence of atmospheric corrosion on the pipeline hanger and documented it in the inspection report. SoCalGas indicated that it created a work order: 520003937709 on 7/18/2024, for the remediation of this inspection finding.

On August 7, 2024, SoCalGas provided the following additional information:

*"SoCalGas agrees with SED's observation and has been begun taking remedial actions. Bridge And Span SAP inspection order 520003936454 was created and completed on June 17, 2024, noting an abnormal operation condition (AOC) of corrosion and pipe supports. A follow up SAP order, 520003937709, was created for remediation of the AOCs on July 18, 2024. Work has begun to acquire appropriate permits to work in the wash from local and state municipalities. SoCalGas does not have the proper, safe, approved scaffolding to access the pipeline. Once an approved scaffold design is available, SoCalGas will begin remediation on the span."*

SED requests that SoCalGas provide status update in its 30-day written response.

**Response & Actions:**

Remediation order 520003937709 has been completed. Light surface rust on the supports was cleared, and the supports were painted. Photos of the repairs have been provided to SED.