



**Alex Hughes**  
Pipeline Safety & Risk Mitigation Manager  
1981 W Lugonia Ave -MLREDL1Z  
Redlands CA 92374  
213-671-1344  
AHughes@SoCalGas.com

October 3, 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 conducted a **General Order (G.O) 112-F inspection of Southern California Gas Company's (SoCalGas) Coastal Transmission Area (Inspection Unit)** from May 6 thru 10, 2024 and May 13 thru 17, 2024. The inspection included a review of the Inspection Unit's maintenance activity records for the period of January 1, 2020, through December 31, 2023. In addition, SED conducted field inspections of representative samples of SoCalGas facilities in the Coastal Transmission Area. SED staff 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 violation of G.O. 112-F, Reference Title 49 CFR, Parts 192, but noted two (2) areas 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 long horizontal flourish extending to the right.

Alex Hughes  
Pipeline Safety and Risk Mitigation Manager

CC:

Larry Andrews, SoCalGas  
Kan Wai Tong, GSRB  
Molla Mohammad Ali, GSRB  
Matthewson Epuna, GSRB  
Claudia Almengor, GSRB

## 2024 SoCalGas Coastal Transmission Audit Response

### Concerns:

#### Maintenance and Operations: Gas Pipeline Maintenance (MO.GM)

Question Title, ID	Valve Maintenance Transmission Lines, MO.GM.VALVEINSPECT. O
Question	11. Are field inspection and partial operation of transmission line valves adequate?
References	192.745(a) (192.745(b))
Assets Covered	2024 SCG Transmission Coastal Audit (18484)
Issue Summary	Title 49, CFR Part 192, Section 192.745 (b) states that, <i>"Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve."</i> During field inspections on May 9, 2024, SoCalGas personnel failed to hydraulically operate valve 406-5.35- V-0 (Ventura) due to inadequate hydraulic fluid. SoCalGas must take appropriate action to ensure that it maintains sufficient hydraulic fluid in its hydraulic valves.

### Response:

As previously provided, SoCalGas agreed with the concern that there was inadequate hydraulic fluid. However, SoCalGas personnel was able to operate the valve per the code requirement. The hydraulic fluid maintenance was remediated on May 10, 2024, and documented on Maximo work order #8623004.

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

Question Title, ID	Atmospheric Corrosion Monitoring, TD.ATM.ATMCORRODEINS. O
Question	5. Is pipe that is exposed to atmospheric corrosion protected?
References	192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), 192.481(d), 192.9(f)(1), 192.453, 192.491)
Assets Covered	2024 SCG Transmission Coastal Audit (18484)
Issue Summary	Title 49, CFR Part 192, Section 192.479(a) states that; <i>"Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section."</i>

During field inspection on 5/8/2024, SED observed that SoCalGas' bridge span on Line 1004, MP 8.35, had indications of atmospheric corrosion.

SoCalGas must take appropriate action to ensure that portions of the pipeline that are exposed to the atmosphere are cleaned and coated to ensure compliance with Title 49 CFR Part 192, Section 192.479(a).

**Response:**

The L1004 span located at mile post 8.35 was inspected and there was no corrosion found, just small areas of surface rust and coating deterioration. The identified areas were cleaned, and the span was painted in the identified areas and documented on Maximo work order #8364777.