

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 7, 2024,

GI-2024-05-SCG-52-01ABC

Mr. Rodger Schwecke,  
Senior Vice President and Chief Infrastructure Officer  
Southern California Gas Company  
555 West 5th Street, GT21C3  
Los Angeles, CA 90013

**SUBJECT: SED's Closure Letter for General Order 112-F Gas Inspection of Southern California Gas Company's Coastal Transmission Area Inspection Unit**

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Southern California Gas Company's (SoCalGas) response letter dated October 3, 2024. The letter addressed the findings identified during the General Order (GO) 112-F inspection of SoCalGas' Coastal Transmission Area that was conducted on May 6-10 and 13-17, 2024.

Attached is a summary of the inspection findings documented by SED, SoCalGas' response to the findings, and SED's evaluation of SoCalGas' response to each identified area of concern.

This letter serves as the official closure of the 2024 G.O.112-F Comprehensive Operation and Maintenance Inspection of SoCalGas' Coastal Transmission Area.

Thank you for your cooperation in this inspection. If you have any questions, please contact Wilson Lule at (213) 392-4965 or by email at [wkl@cpuc.ca.gov](mailto:wkl@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthewson Epuna".

Matthewson Epuna  
Program & Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

CC: Larry Andrews, SoCalGas, Kan Wai Tong, SED/GSRB, Molla Mohammad Ali, SED/GSRB, Claudia Almengor, SED/GSRB, Terence Eng, SED/GSRB.

# Post-Inspection Written Preliminary Findings

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**Date of Transmittal:** 07/17/2024

**Dates of Inspection:** May 6 to 10 and May 13 to 17, 2024

**Operator:** SOUTHERN CALIFORNIA GAS CO.

**Operator ID:** 18484 (primary)

**Inspection Systems:** Gas Transmission

**Assets (Unit IDs) with results in this report:** T: Coastal (87055)

**System Type:** GT

**Inspection Name:** SoCalGas-Transmission Coastal

**Lead Inspector:** Wilson Lule

**Operator Representative:** Edwin Baires

## Unsatisfactory Result

**No Preliminary Findings.**

## 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      | <p>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></p> <p>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.</p> <p>SoCalGas must take appropriate action to ensure that it maintains sufficient hydraulic fluid in its hydraulic valves.</p> |

**SoCalGas Response:**

As previously provided, SoCalGas agreed with the concern that there was inadequate hydraulic fluid. However, SoCalGas personnel were 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.

**SED's Conclusion:**

SED has reviewed SoCalGas' response and accepts the corrective actions that SoCalGas implemented. SED may verify the completion of corrective actions in the field during future inspections.

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

|                    |  |
|--------------------|--|
| Question Title, ID | Atmospheric Corrosion Monitoring, TD.ATM.ATMCORRODEINSP. 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      | <p>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></p> <p>During field inspection on 5/8/2024, SED observed that SoCalGas' bridge span on Line 1004, MP 8.35, had indications of atmospheric corrosion.</p> <p>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).</p> |

**SoCalGas 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.

**SED's Conclusion:**

SED has reviewed SoCalGas' response and accepts the corrective actions that SoCalGas implemented. SED may verify the completion of corrective actions in the field during future inspections.