

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 29, 2024

GI-2024-06-SCG-68-02

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)'s NW Central Coast Distribution Area (Inspection Unit)** on June 10, through June 14, 2024, and June 17, 2024. 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, 2020, through December 31, 2023, and field inspections of SoCalGas' pipeline facilities in Santa Barbara, Ventura-Oxnard and Simi 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 identified zero (0) probable violations of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, and noted one (1) area of concern which is described in the attached "Post-Inspection Written Preliminary Findings".

Prior to this inspection letter, SoCalGas provided adequate responses to each concern. Therefore, this letter also serves as an official closure of the 2024 Comprehensive Operation and Maintenance Inspection of SoCalGas NW Central Coast Natural Gas Distribution Area Districts.

Thank you for your cooperation in this inspection. If you have any questions, please contact Randy Holter PE, Senior Utilities Engineer, at (818) 821-4309 or by email at [randy.holter@cpuc.ca.gov](mailto:randy.holter@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, which appears to read "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: Next page

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Claudia Almengor  
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Gas Safety and Reliability Branch  
Safety and Enforcement Division

## Post-Inspection Written Preliminary Findings

**Dates of Inspection:** June 10 – 14, 2024

**Operator:** SOUTHERN CALIFORNIA GAS CO

**Operator ID:** 18484 (primary)

**Inspection Systems:** Santa Barbara, Ventura-Oxnard, Simi Valley

**Assets (Unit IDs) with results in this report:** Central Coast (87051)

**System Type:** GD

**Inspection Name:** SoCalGas Distribution NW Central Coast

**Lead Inspector:** Randy Holter

**Operator Representative:** Linda Baker

### Unsatisfactory Results

*No Preliminary Findings.*

### Concerns

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

Question Title, Correction of Corrosion Control Deficiencies, TD.CPMONITOR.DEFICIENCY.R  
ID

Question 13. Do records adequately document actions taken to correct any identified deficiencies in corrosion control?

References 192.491(c) (192.465(d))

Assets Covered Northwest - Central Coast (87051 (68))

Issue Summary: SED reviewed SoCalGas' cathodic protection (CP) records and found pipe-to-soil (P/S) Work Orders were out of tolerance (low P/S read) from its -0.850 volts criterion:

Separately protected service lines (CP10%) Assets Work Orders out of tolerance (low P/S read) from its -0.850 volts criterion (Calendar year 2020):

1. GD.NOR.SMV.SH.00310702 00310702 [REDACTED] AVE NEWBURY PARK CP10 Maint Reads 520002315859 100017278600 -0.310 V -0.310 V
2. GD.NOR.SMV.SH.00310758 00310758 [REDACTED] PL NEWBURY PARK CP10 CGI Follow Up Read 520002397583 100017965744 -0.550 V -0.550 V
3. GD.NOR.SMV.SH.00310758 00310758 [REDACTED] PL NEWBURY PARK CP10 Maint Reads 520002315857 100017280452 0.000 V 0.000 V
4. GD.NOR.SMV.SH.00310762 00310762 [REDACTED] PL NEWBURY PARK CP10 Maint Reads 520002315858 100017280448 -0.520 V -0.520 V

5. GD.NOR.SMV.SH.00310818 00310818 [REDACTED] CT NEWBURY PARK CP10 Maint Reads 520002315861 100017278588 -0.340 V -0.340 V
6. GD.NOR.SMV.SH.00310882 00310882 [REDACTED] AVE NEWBURY PARK CP10 Maint Reads 520002315854 100017278844 -0.350 V -0.350 V
7. GD.NOR.SMV.SH.00310883 00310883 [REDACTED] AVE NEWBURY PARK CP10 Maint Reads 520002315854 100017278845 -0.590 V -0.590 V

CP10% Assets Work Orders out of tolerance (low P/S read) from its -0.850 volts criterion (Calendar year 2021):

1. GD.NOR.SBR.SH.02700016 02700016 [REDACTED] RD SPC 129 SANTA BARBARA CP10 Maint Reads 520002566969 100019185363 -0.780 V -0.780 V
2. GD.NOR.SBR.SH.02700121 02700121 [REDACTED] RD SPC 235 SANTA BARBARA CP10 Maint Reads 520002566970 100019185354 -0.710 V -0.710 V
3. GD.NOR.SBR.SH.00328549 00328549 [REDACTED] CARPINTERIA CP10 Maint Reads 520002735469 100020168044 -0.690 V -0.690 V
4. GD.NOR.SBR.SH.00328549 00328549 [REDACTED] CARPINTERIA CP10 Maint Reads 520002566883 100019178431 -0.630 V -0.630 V
5. GD.NOR.SBR.SH.00328899 00328899 [REDACTED] CARPINTERIA CP10 Maint Reads 520002566926 100019184425 -0.560 V -0.560 V
6. GD.NOR.SBR.SH.00142962 00142962 [REDACTED] DR CARPINTERIA CP10 Maint Reads 520002566898 100019185859 -0.540 V -0.540 V
7. GD.NOR.SBR.SH.00143043 00143043 [REDACTED] DR CARPINTERIA CP10 Maint Reads 520002566898 100019185712 -0.530 V -0.530 V
8. GD.NOR.SBR.SH.00143111 00143111 [REDACTED] LN CARPINTERIA CP10 Maint Reads 520002566900 100019185830 -0.530 V -0.530 V
9. GD.NOR.SBR.SH.02700710 02700710 [REDACTED] RD SANTA BARBARA CP10 Maint Reads 520002566992 100019183714 -0.460 V -0.460 V
10. GD.NOR.SBR.SH.02522398 02522398 [REDACTED] DR SANTA BARBARA CP10 Maint Reads 520002566953 100019180914 -0.450 V -0.450 V

CP10% Assets Work Orders out of tolerance (low P/S read) from its -0.850 volts criterion (Calendar year 2022):

1. GD.NOR.OXN.SH.03420613 03420613 [REDACTED] CT CAMARILLO CP10 CGI Follow Up Read 520003119442 100022224666 -0.770 V -0.770 V
2. GD.NOR.OXN.SH.00511630 00511630 [REDACTED] LN VENTURA CP10 CGI Follow Up Read 520003057307 100021911602 -0.640 V -0.640 V
3. GD.NOR.OXN.SH.00139410 00139410 [REDACTED] DR FILLMORE CP10 Maint Reads 520002889550 100021217268 -0.620 V -0.620 V
4. GD.NOR.OXN.SH.03420899 03420899 [REDACTED] PL CAMARILLO CP10 CGI Follow Up Read 520003120508 100022230287 -0.550 V -0.550 V
5. GD.NOR.OXN.SH.00139840 00139840 [REDACTED] ST FILLMORE CP10 Maint Reads 520002881336 100021097864 -0.400 V -0.400 V
6. GD.NOR.OXN.SH.00141192 00141192 [REDACTED] LN VENTURA CP10 CGI Follow Up Read 520003077291 100022017088 -0.240 V -0.240 V

7. GD.NOR.OXN.SH.00139308 00139308 [REDACTED] ST FILLMORE  
CP10 Maint Reads 520002881381 100021093564 -0.010 V -0.010 V

CP Areas out of tolerance (low P/S read) from its -0.850 volts criterion > than 200 days:

1. GD.NOR.OXN.CP.VCO1137\_1\_A VCO1137-1-A
2. GD.NOR.SMV.CP.VCO3932\_1\_D VCO3932-1-D
3. GD.NOR.OXN.CP.HP 083 HP 083
4. GD.NOR.OXN.CP.HP 468 HP 468
5. GD.NOR.SBR.CP.HM 063 HM 063

SoCalGas CP Areas out of tolerance (low P/S read) from its -0.850 volts criterion ≤ than 200 days:

1. HM 435 (field area down - not checked)
2. HM 003; (field read Equipment #600153036)

**Title 49 CFR, Part 192, Section 192.465(d) states in part:**

*“Each operator must promptly correct any deficiencies indicated by the inspection and testing required by paragraphs (a) through (c) of this section.”*

**PHMSA Interpretation #PI-89-006 states in part:**

*“The definition of “prompt” will vary with the circumstances. Enforcement should be sought only when the investigator is convinced that corrective action was unreasonably delayed. Investigator must state why he determined the delay to be unreasonable.*

*The operator should be required to have procedures (per 192.453) for responding to deficiencies found by the required monitoring. Those procedures should include as a minimum:*

- 1. A time frame for evaluating data and determining a course of action.*
- 2. A time frame for any new installation to be operational and Cathodic Protection to be in the adequate range.*

*These time frames should give consideration to the population density and environmental concerns of the area that could potentially be affected by released product. They may also consider climatic conditions, availability of material, workloads, and an estimate of a relative rate of detrimental corrosion. As a rule of thumb, the OPS would expect that, under normal conditions, the operator should have the evaluations and decisions made and action started within a few months, (proportionally less where required monitoring is less than a year or where deficiencies could result in an immediate hazard to the public), and correction completed by the time of the next scheduled monitoring. If the operator has no procedure for promptly responding and deficiencies exist, it is a violation of 192.465(d). If you can demonstrate that the operator's established time frame for action is inadequate, you may cite him for a violation or proceed with a notice of amendment or both.”*

**SoCalGas Gas Standard 186.0135 Operation and Maintenance of Cathodic Protection Facilities, Section 1. Policy and Scope, Subsection 1.4 states:**

*“Any deviations from Company standards discovered during monitoring shall be corrected and require prompt remedial action. See Standard 186.02, Inspection of Exposed Pipe, for additional remedial requirements.*

*1.4.1. The Company should commence the troubleshooting process within 30 days, but commencement shall not exceed 60 days, starting from the date the area was determined to be out of tolerance.*

*1.4.2. Any identified problems after troubleshooting shall be included when determining a remediation plan as soon as practicable. Deficiency corrections should be remedied by the time of the next scheduled annual monitoring.*

*1.4.3. Any remediation plan that includes corrective actions outside of the next scheduled annual monitoring or goes beyond 15 months for CP10 isolated mains/services requires escalation to manager.*

*1.4.4. Escalation and Notification Requirements for Out-of-Tolerance Situations (Effective from 7/6/2015)*

- *The operating Region/organization CP supervisor is responsible for reviewing the CP area out-of-tolerance list every month.*
- *The supervisor is responsible for reviewing, agreeing with, and/or identifying further action(s) if any area remains out of tolerance for longer than 9 months (274 days).*
- *The operating Region/organization manager responsible for CP compliance shall be notified if any area remains out of tolerance for longer than 12 months (365 days). The manager is responsible for reviewing and evaluating the supervisor’s identified action(s).*
- *Once an area has been out of tolerance for over 12 months (365 days), a quarterly update shall go to the supervisor, manager, and director for review and comment. This update is an ongoing requirement until the issue is corrected and the supervisor, manager, and director have been notified.*

**Note:** If permits are delaying corrective actions, contact Pipeline Safety and Compliance for California Public Utilities Commission (CPUC) assistance to obtain permits from applicable agency.

- *The operating Region/organization CP supervisor is responsible for notifying the manager and director when an escalated area has been remedied*

During the Inspection Unit Exit Meeting, SED requested for SoCalGas to verify that SoCalGas Operations took prompt remedial action and followed its Gas Standard to remediate the out-of-tolerance (low CP reads), CP Areas and CP10% listed above. Records should show actions were taken to bring the out-of-tolerance (low CP reads), CP Areas and CP10% listed above to adequate levels of protection for controlling external corrosion of district steel distribution gas pipelines.

**SoCalGas Responses and SED Responses to SoCalGas**

On July 3, 2024, SoCalGas provided SED with corrective actions and project status updates to noted concerns

- **SoCalGas Responses - CP10% - Calendar year 2020:**

On July 3, 2024, SoCalGas provided SED with corrective actions and project status updates to separately protected service lines (CP10%) Assets Work Orders out of tolerance (low P/S read) from its -0.850 volts criterion (Calendar year 2020):

1. GD.NOR.SMV.SH.00310702 00310702 [REDACTED] AVE  
NEWBURY PARK CP10 Maint Reads 520002315859 100017278600 - 0.310 V -0.310 V  
SoCalGas Response: No longer a CP10 – Replacement Work Order (WO)# 540000403698.
2. GD.NOR.SMV.SH.00310758 00310758 [REDACTED] PL NEWBURY PARK CP10 CGI Follow Up Read 520002397583 100017965744 -0.550 V -0.550 V  
SoCalGas Response: No longer a CP10 – Replacement WO#540000575260.
3. GD.NOR.SMV.SH.00310758 00310758 [REDACTED] PL NEWBURY PARK CP10 Maint Reads 520002315857 100017280452 0.000 V 0.000 V  
SoCalGas Response: Same as above [No longer a CP10 – Replacement WO#540000575260].
4. GD.NOR.SMV.SH.00310762 00310762 [REDACTED] PL NEWBURY PARK CP10 Maint Reads 520002315858 100017280448 -0.520 V -0.520 V  
SoCalGas Response: No longer a CP10 – Replacement WO#540000575260.
5. GD.NOR.SMV.SH.00310818 00310818 [REDACTED] CT NEWBURY PARK CP10 Maint Reads 520002315861 100017278588 - 0.340 V -0.340 V  
SoCalGas Response: No longer a CP10 - Replacement WO#540000517570.
6. GD.NOR.SMV.SH.00310882 00310882 [REDACTED] AVE NEWBURY PARK CP10 Maint Reads 520002315854 100017278844 - 0.350 V -0.350 V  
SoCalGas Response: No longer a CP10 – Replacement WO#540000416962.
7. GD.NOR.SMV.SH.00310883 00310883 [REDACTED] AVE NEWBURY PARK CP10 Maint Reads 520002315854 100017278845 - 0.590 V -0.590 V  
SoCalGas Response: No longer a CP10 – Replacement WO#540000416962.

**SED Response - CP10% - Calendar year 2020:**

SED has reviewed SoCalGas' above CP10% - 2020 responses which show the individual work order activities and accepts the corrective actions that have been performed as adequate. SED considers these issues to be closed.

- **SoCalGas Responses - CP10% - Calendar year 2021:**

On July 3, 2024, SoCalGas provided SED with corrective actions and project status updates to CP10% Assets Work Orders out of tolerance (low P/S read) from its -0.850 volts criterion (Calendar year 2021):

1. SoCalGas Response: GD.NOR.SBR.SH.02700016 02700016 340 OLD MILL RD SPC [REDACTED] CP10 Maint Reads 520002566969 100019185363 -0.780 V -0.780 V  
SoCalGas Response: No issues, read back up on 9/9/21: -1.650 – Read back up under WO#520002619096.
2. GD.NOR.SBR.SH.02700121 02700121 [REDACTED] RD SPC 235 SANTA BARBARA CP10 Maint Reads 520002566970 100019185354 - 0.710 V -0.710 V  
SoCalGas Response: No issues, read back up on 9/9/21: -1.250 – Read back up under WO#520002639028.
3. GD.NOR.SBR.SH.00328549 00328549 [REDACTED] CARPINTERIA CP10 Maint Reads 520002735469 100020168044 -0.690 V -0.690 V  
SoCalGas Response: No issues, read back up on 9/17/21: -1.140 – Read back up. under WO#520002796715
4. GD.NOR.SBR.SH.00328549 00328549 [REDACTED] CARPINTERIA CP10 Maint Reads 520002566883 100019178431 -0.630 V -0.630 V  
SoCalGas Response: Same as above [SoCalGas Response: No issues, read back up on 9/17/21: -1.140 – Read back up].
5. GD.NOR.SBR.SH.00328899 00328899 [REDACTED] CARPINTERIA CP10 Maint Reads 520002566926 100019184425 -0.560 V -0.560 V  
SoCalGas Response: No longer a CP10 – Plastic inserted in 1989 with riser adapter, no more steel, plastic main.
6. GD.NOR.SBR.SH.00142962 00142962 [REDACTED] DR CARPINTERIA CP10 Maint Reads 520002566898 100019185859 -0.540 V -0.540 V  
SoCalGas Response: No longer a CP10 – Replacement WO#540000524128
7. GD.NOR.SBR.SH.00143043 00143043 [REDACTED] DR CARPINTERIA CP10 Maint Reads 520002566898 100019185712 -0.530 V -0.530 V  
SoCalGas Response: No issues, read back up on 9/9/21: -1.510 – Read back up under WO#520002596356
8. GD.NOR.SBR.SH.00143111 00143111 [REDACTED] LN CARPINTERIA CP10 Maint Reads 520002566900 100019185830 -0.530 V -0.530 V  
SoCalGas Response: No longer a CP10 – verified by field inspection on 09/09/2021
9. GD.NOR.SBR.SH.02700710 02700710 [REDACTED] RD SANTA BARBARA CP10 Maint Reads 520002566992 100019183714 -0.460 V - 0.460 V  
SoCalGas Response: No issues, read back up on 11/11/21: -1.410 – Read back up under WO#520002654935
10. GD.NOR.SBR.SH.02522398 02522398 [REDACTED] DR SANTA BARBARA CP10 Maint Reads 520002566953 100019180914 -0.450 V - 0.450 V  
SoCalGas Response: No issues, read back up on 9/13/21: -1.490 – Read back up under WO#520002654903.

**SED Response - CP10% - Calendar year 2021:**



SED has reviewed SoCalGas' above CP10% - 2021 responses which show the individual work order activities and SED accepts the corrective actions that have been performed as adequate. SED considers these issues to be closed.

- **SoCalGas Responses - CP10% - Calendar year 2022:**

On July 3, 2024, SoCalGas provided SED with corrective actions and project status updates to CP10% Assets Work Orders out of tolerance (low P/S read) from its -0.850 volts criterion (Calendar year 2022):

1. GD.NOR.OXN.SH.03420613 03420613 [REDACTED] CT CAMARILLO  
CP10 CGI Follow Up Read 520003119442 100022224666 -0.770 V -0.770 V  
SoCalGas Response: Order WO#520003874219; up read (-1.50).
2. GD.NOR.OXN.SH.00511630 00511630 [REDACTED] LN VENTURA  
CP10 CGI Follow Up Read 520003057307 100021911602 -0.640 V -0.640 V  
SoCalGas Response: No issues, read back up on 9/28/22: -1.130 – Read back up under WO#520003143530.
3. GD.NOR.OXN.SH.00139410 00139410 [REDACTED] DR  
FILLMORE CP10 Maint Reads 520002889550 100021217268 -0.620 V - 0.620 V  
SoCalGas Response: No longer a CP10 – Replacement WO#540000524461.
4. GD.NOR.OXN.SH.03420899 03420899 [REDACTED] PL CAMARILLO  
CP10 CGI Follow Up Read 520003120508 100022230287 -0.550 V -0.550 V  
SoCalGas Response: WO#520003874139; up read (-1.40).
5. GD.NOR.OXN.SH.00139840 00139840 [REDACTED] EMAN ST FILLMORE  
CP10 Maint Reads 520002881336 100021097864 -0.400 V -0.400 V  
SoCalGas Response: No longer a CP10 – Replacement WO#540000527093.
6. GD.NOR.OXN.SH.00141192 00141192 [REDACTED] LN VENTURA  
CP10 CGI Follow Up Read 520003077291 100022017088 -0.240 V -0.240 V  
SoCalGas Response: No longer a CP10 – Replacement WO#540000567380.
7. GD.NOR.OXN.SH.00139308 00139308 [REDACTED] ST  
FILLMORE CP10 Maint Reads 520002881381 100021093564 -0.010 V - 0.010 V  
SoCalGas Response: No longer a CP10 – Replacement WO#540000518152.

**SED Response - CP10% - Calendar year 2022:**

SED has reviewed SoCalGas' above CP10% - 2022 responses which show the individual work order activities and SED accepts the corrective actions that have been performed. SED considers these issues to be closed.

- **SoCalGas Responses - Areas Out of Tolerance > 200 Days:**

On July 3, 2024, SoCalGas provided SED with corrective actions and project status updates for CP Areas out of tolerance (low P/S read) from its -0.850 volts criterion equal or greater than 200 days:

1. GD.NOR.OXN.CP.VCO1137\_1\_A VCO1137-1-A  
SoCalGas Response: The Contractor is in planning to reroute the damaged structure wires to the rectifier.

2. GD.NOR.SMV.CP.VCO3932\_1\_D VCO3932-1-D  
SoCalGas Response: Awaiting Cal-Trans permitting for the installation of the broken ETS wire.
3. GD.NOR.OXN.CP.HP 083 HP 083  
SoCalGas Response: Area read up 5/24/24. On September 25, 2023, SoCalGas initiated a WO to install replacement ECS. However, due to the changes in the City of Oxnard's permitting process for subcontractors, there was a significant delay in obtaining the necessary permits. As a result, the installation task was reassigned from the subcontractor to the company's internal crew. The permit was finally granted in May 2024. Following this, the company crew successfully installed the anodes on May 21, 2024. The area was subsequently inspected with the results of the area read up on May 24, 2024.
4. GD.NOR.OXN.CP.HP 468 HP 468  
SoCalGas Response: Area current deficient pending planning for additional anodes install. On January 23, 2024, SoCalGas scheduled the installation of an additional ECS. This was successfully installed in the designated area on May 28, 2024. The process took longer than expected due to the lengthy permitting process in the City of Oxnard. However, the newly installed ECS did not produce sufficient current to bring the area up, likely a result of adverse soil conditions. To rectify this situation, SPS will strategize the placement of another ECS during the upcoming site visit.
5. GD.NOR.SBR.CP.HM 063 HM 063  
SoCalGas Response: Area current deficient pending permitting for planned anodes install. The troubleshooting process commenced on November 20, 2023. After numerous visits and with the assistance of the Lead SPS, a challenging short circuit was successfully identified and rectified by April 10, 2024. Following the resolution of the short circuit, it was discovered that the area was deficient in current. Consequently, a WO was issued during the subsequent site visit on May 13, 2024, to replace the anodes of the ECS #2, subject to the necessary permits. A revised TCP was submitted to the City of Goleta on June 10, 2024.

**SED Response - Areas Out of Tolerance > 200 Days:**

SED has reviewed SoCalGas' above Areas Out of Tolerance greater than 200 Days responses which show the individual work order plan of activities and SED accepts the corrective plan or corrective actions that have been performed as adequate. SED considers these issues to be closed.

- **SoCalGas Responses - Areas Out of Tolerance ( $\leq$  200 Days):**

On July 3, 2024, SoCalGas provided SED with corrective actions and project status updates for CP Areas out of tolerance (low P/S read) from its -0.850 volts criterion less than or equal to than 200 days:

1. HM 435 (field area down - not checked)  
SoCalGas Response: Area had no low reads during CPUC field inspection 06/12/24. Read point B was -1.738V, Rectifier Volts 6.4V (5.0 – 7.0); Rectifier Amps 5.4A (4.8 – 6.9).
2. HM 003; (field read Equipment #600153036) Area low reads found during CPUC inspection on 06/12/24.  
SoCalGas Response: Started troubleshooting 06/17/24.

**SED Response - Areas Out of Tolerance ( $\leq 200$  Days):**

SED has reviewed SoCalGas' above Areas Out of Tolerance  $\leq 200$  Days responses which show the individual work order plan of activities and SED accepts the corrective plan or corrective actions that have been performed as adequate.

SED considers these issues to be closed. SED may review the effectiveness and adequacy of the corrective actions as required and may conduct field verification inspections in future audits.