

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 11, 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: 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 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 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 violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192. However, SED noted **two** areas of concern. These are described in the attached "**Post-Inspection Written Preliminary Findings**". Please provide a written response within 30 days of receipt of this letter, indicating the measures SoCalGas took to address the noted concerns.

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.

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng". The signature is stylized with a large, sweeping initial "T" and a long, horizontal flourish extending to the right.

Terence Eng, P.E
Program Manager
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, Matthewson Epuna, 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 Title 49, CFR Part 192, Section 192.745 (b) states that, *"Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve."*

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.

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 Title 49, CFR Part 192, Section 192.479(a) states that; *“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.”*

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).

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