



Troy A. Bauer
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April 14, 2021

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 Comprehensive Review and Inspection of San Diego Gas and Electric Company (SDG&E)'s Operation and Maintenance (O&M) Procedures** on January 11 through January 15, 2021. SED staff reviewed SDG&E's written O&M procedures pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (CFR), Parts 191 & 192, and used Pipeline and Hazardous Materials Safety Administration (PHMSA)'s Inspection Assistance (IA) as a reference guide to conduct the inspection.

SED staff identified four (4) areas of concern. Attached are SDG&E' written responses.

Please contact Troy A. Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Troy A. Bauer".

Troy A. Bauer
Pipeline Safety and Compliance Manager

CC:
Gwen Marelli, SoCalGas
Mahmoud Intably, SED
Kan-Wai Tong, SED
Desmond Lew, SED
Claudia Almengor, SED

**2021 SDG&E Operation and Maintenance Audit
01/11/2021 to 11/15/2021**

Concern(s)

1. Title 49 CFR Part 192, §192.505(d) - Strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of SMYS states:

“For fabricated units and short sections of pipe, for which a post installation test is impractical, a preinstallation strength test must be conducted by maintaining the pressure for at least 4 hours.”

SDG&E's Gas Standard (GS) G7361, Pipeline Testing Requirements, §4.2.2, states in part:

“Horizontally Directionally Drilled (HDD) pipe where a post-installed pressure test failure would be difficult to locate, repair or replace, shall be pretested for a minimum test duration of 4 hours at the planned post-construction hold pressure if the pipe segment will be operating at 30% SMYS or greater.”

SED recommends SDG&E revise this section to be consistent with the language stated in the regulation and to remove any ambiguity or misconception of the meaning that includes addressing:

- “short sections of pipe” and
- “a preinstallation strength test must be conducted”

SDG&E Response:

A post-installation pressure test is required for all HDDs as stated in GS7361. For clarity's sake, we added the following changes to GS7361 Section 4.2.2: The term “*planned hold post-construction pressure*” has been changed to “*planned hold post-installation test pressure;*” and the statement was revised to clarify the need for a post-installation pressure test, “*Regardless of whether a pre-test is completed, a post-installation pressure test is required to be performed that meets the requirements in Table 2.*”

Section 4.2.1 addresses the pressure test requirements for “short sections of pipe” which meets the requirements of 192.505 (d).

2. SED reviewed SDG&E's Gas Standard (GS) G8141, Pipeline Markers for compliance in the course of this inspection. §2.3 of the GS states:

"The installation and maintenance of pipeline markers must be conducted by trained personnel familiar with the location and operation of the pipeline."

While trained personnel may be knowledgeable in installing and maintaining pipeline, unless they have been qualified, they cannot perform the covered task “maintaining line markers for buried main and transmission”. SED recommends SDG&E to revise §2.3 to replace “trained personnel” with “qualified personnel” and to ensure consistency with §6 Operator Qualification Covered Tasks, Covered Task 08.02 – Title 49 CFR, Part 192, §192.707 Maintaining line markers for buried main and transmission lines.

SDG&E Response:

In September 2020 the Gas Standard G8141 section 2.3 was updated to state as follows:

*2.3. The installation and maintenance of pipeline markers must be conducted by **qualified** and trained personnel familiar with the location and operation of the pipeline.*

3. Title 49 CFR Part 192, §192.505(d) - Strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of SMYS states:

“For fabricated units and short sections of pipe, for which a post installation test is impractical, a preinstallation strength test must be conducted by maintaining the pressure for at least 4 hours.”

SDG&E's Gas Standard (GS) G7361, Pipeline Testing Requirements, §4.2.2, states in part:

“Horizontally Directionally Drilled (HDD) pipe where a post-installed pressure test failure would be difficult to locate, repair or replace, shall be pretested for a minimum test duration of 4 hours at the planned post-construction hold pressure if the pipe segment will be operating at 30% SMYS or greater.”

SED recommends SDG&E revise this section to be consistent with the language stated in the regulation and to remove any ambiguity or misconception of the meaning that includes addressing:

- “short sections of pipe” and
- “a preinstallation strength test must be conducted”

SDG&E Response:

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