

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 4, 2021

GI-2021-02-SCG-58-02ABC

Mr. Rodger Schwecke, Senior Vice President
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 San Gabriel Valley Distribution Area** (Inspection Unit) on February 22 through March 5, 2021 for calendar years 2017 through 2020. 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. SED conducted records review and field inspections of pipeline facilities at Alhambra, Azusa, City of Industry and Pasadena Distribution districts. SED's staff also reviewed the implementation of the Operator Qualification program, which included field observation of randomly selected individuals performing covered tasks.

SED conducted remote records review on February 22 through February 23 and in-person records review on February 24 and March 5 of this Inspection Unit. In addition, SED conducted field inspections of pipeline facilities on February 25 through 26, March 1 through 4, and concluded its audit with a remote closing meeting on March 5.

SED's staff identified one (1) violation and six (6) areas of concern of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, which are described in the attached "Post-Inspection Written Preliminary Findings".

Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by SoCalGas to address the violation and the concerns noted in the "Post-Inspection Written Preliminary Findings".

If you have any questions, please contact Gordon Kuo, Utilities Engineer, at (213) 618-5263 or by email at GK2@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Terence Eng".

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Attachment

cc: See next page

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Gordon Kuo
Utilities Engineer
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Claudia Almengor
Associate Governmental Program Analyst
Gas Safety and Reliability Branch
Safety and Enforcement Division

Post-Inspection Written Preliminary Findings

Date of Transmittal: 04/13/2021

Dates of Inspection: 2/22/21 – 2/26/21, 3/1/21 – 3/5/21

Operator: SOUTHERN CALIFORNIA GAS CO

Operator ID: 18484 (primary)

Inspection Systems: 87041 (58)

Assets (Unit IDs) with results in this report: Southeast - San Gabriel Valley (87041)

System Type: GD

Inspection Name: 2021 SCG San Gabriel Valley Distribution

Lead Inspector: Gordon Kuo

Operator Representative: Gordon Kuo, Gordon Huang

Unsatisfactory Results

Records: Operations And Maintenance (PRR.OM)

Question 24. Do records indicate proper inspection of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable?

References 192.603(b) (192.747(a), 192.747(b))

Assets Covered Southeast - San Gabriel Valley (87041 (58))

Issue Summary During records review, SED found that the Valve 31-08-C-1 was not inspected between 6/1/2017 and 6/1/2019 which created a 24-month time gap between the last two inspections. Since the inspection interval of this valve exceeds 15 months, SED finds SoCalGas in violation of Part 192, §192.747(a).

Concerns

Records: Corrosion Control (PRR.CORROSION)

Question 5. Do records adequately document cathodic protection monitoring tests have occurred as required?

References 192.491(c) (192.465(a))

Assets Covered Southeast - San Gabriel Valley (87041 (58))

Issue Summary During records review, SED found that the CP10 WO#520002592078 with Service ID 02785338 executed on 2/11/2021, the 'As Found' and 'As Left' reads for the section of pipeline were both '-.87'

volts. The condition was noted as 'CP10 Read Up'. SoCalGas' Gas Standard 186.0005 Cathodic Protection – Mixed Piping System, §5.3.2.1 states:

"Any facility found during routine CP10 monitoring shall require remediation if the pipe to soil measurement is below -0.900 Volts DC, in order to prevent possible loss of protection for the facility during the 10-year monitoring interval. The required remediation action shall be completed."

However, SoCalGas considered the -.87 V adequate and did not remedial the conditions under WO# 520002592078.

SED requests that SoCalGas confirm the 'As Left' read value and explain why no remediation was performed on this CP10 location.

Records: Operations And Maintenance (PRR.OM)

Question 2. Are construction records, maps and operating history available to appropriate operating personnel?

References 192.605(a) (192.605(b)(3))

Assets Covered Southeast - San Gabriel Valley (87041 (58))

Issue Summary During the field inspection on February 26, 2021, SED observed SoCalGas crews performing a valve inspection on a gate valve, Valve #31036. SED found that SoCalGas' SAP records stated the incorrect number of turns in order to fully close the valve. Even though a routine valve inspection does not require the full operation, the correct operation information, e.g. number of turns to close a valve, needs to be stated in SoCalGas' SAP records and provided to the crew to confirm the full operation in case of emergency.

SED recommends that SoCalGas review its SAP records to ensure that the correct number of turns is recorded for its gate valve and provided to its crews at the work locations.

Pipeline Field Inspection: Pipeline Inspection (Field) (FR.FIELDPIPE)

Question 4. Are meters and service regulators being located consistent with the requirements of 192.353?

References 192.351 (192.353(a), 192.353(b), 192.353(c), 192.353(d))

Assets Covered Southeast - San Gabriel Valley (87041 (58))

Issue Summary During the field inspection in Pasadena district on 2/25/2021 SED observed four locations where vehicular damage to the meter and/or service regulated may be anticipated. SoCalGas stated that they have identified the condition and have queued the affected MSAs for remediation per their response to SED's data request received on March 4, 2021.

SED acknowledges SoCalGas is addressing those MSA protection deficiencies at this time. However, SED requests a follow up regarding SoCalGas' remediation efforts.

<u>Address</u>	<u>Condition</u>
████ Morningside St, Pasadena	Guardrail
████ Morningside St, Pasadena	Guardrail
████ Morningside St, Pasadena	Guardrail
████ Morningside St, Pasadena	Guardrail

Question 6. Are meters and service regulators being installed consistent with the requirements of 192.357?

References 192.351 (192.357(a), 192.357(b), 192.357(c), 192.357(d))

Assets Covered Southeast - San Gabriel Valley (87041 (58))

Issue Summary During the field inspection on 2/25/2021, SED observed a gas meter at the address of █████ Melville Dr. Pasadena with a relieving regulator in an enclosed space was not vented directly to the outside

through piping, e.g. regulator not venting out of crawl space. SoCalGas has acknowledged this item is currently being looked at for remediation.

SED requests that SoCalGas provide an update regarding the remediation efforts for that item.

Question 25. 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))

Assets Covered Southeast - San Gabriel Valley (87041 (58))

Issue Summary During the bridge and span inspection of bridge B1075 in Alhambra district on March 4, 2021, SED observed that B1075 was not wrapped and was experiencing light atmospheric corrosion on both the northern and southern ends.

SED recommends SoCalGas to take a remedial action to address SED's finding.

Question 31. Are line markers placed and maintained as required?

References 192.707(a) (192.707(b), 192.707(d), CGA Best Practices, v4.0, Practice 2-5, CGA Best Practices, v4.0, Practice 4-20)

Assets Covered Southeast - San Gabriel Valley (87041 (58))

Issue Summary During the bridge and span inspection of B2722 and B2722-A in Pomona on March 4, 2021, SED observed that the pipeline marker pucks on the west end of the railroad grade separation were found to be either taped or painted over, rendering the marker information illegible. Per SoCalGas LCT, the City of Industry district will follow-up on remediating the marker pucks. SED also observed the LCT enter its remediation as an "action required" item into the work order for B2722 (520002507834).

SED requests a status update and photo confirmation showing the remediations of the line marker issues for both above ground pipelines, B2722 and B2722-A (WO# 520002507836).