

APPENDIX B



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December 7, 2020

Via Electronic Mail

Terrence Eng, P.E.
Program Manager, Gas Safety & Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: SoCalGas Request for Stay of Enforcement of Identified Compliance Activities to Support Continued Safe and Reliable Service During COVID-19 Pandemic

Mr. Eng,

This letter serves as follow up to a meeting held on November 16, 2020 between SoCalGas, the Commission's Safety and Enforcement Division (SED), the Commission's Legal Division, and the Pipeline and Hazardous Materials Safety Administration (PHMSA), regarding SoCalGas' request for extension of time to comply with certain activities as a proactive measure to help mitigate the potential impacts associated with the COVID-19 pandemic. SoCalGas appreciates the consideration and continued dialogue concerning this request, as it looks to create the operational flexibility that is needed during these unprecedented times; especially as California has seen COVID-19 cases rise more acutely in the recent months.

On October 8, 2020 SoCalGas received a letter from the Commission (the October 8th Letter) granting, with conditions, our request for waiver of specific activities identified in Attachment 1 of this letter. Condition 4 of the October 8th Letter requires that SoCalGas submit to SED a monthly report providing information and details for each of the activities that have been delayed. On November 6, 2020 SoCalGas provided its first report to the SED indicating that no activities have been impacted or delayed thus far. As required, the next report will be submitted on December 7, 2020.

Following the issuance of the October 8th Letter, the Commission's Legal Division requested a meeting with SoCalGas, SED, and PHMSA to further discuss the waiver request. During this meeting, we reviewed and discussed the compliance activities and their respective 49 CFR Part 192 code requirements with Mr. Steve Nanney from PHMSA. These code requirements are identified in Attachment 2 of this letter. SoCalGas described each activity and provided justification for each of the code sections that was associated with the respective compliance activity where a waiver was being requested.

After this review, the parties agreed that not all the Code sections for which SoCalGas had originally requested a waiver should be included in the waiver request. Therefore, SoCalGas respectfully submits the revised list of activities and their corresponding 49 CFR Part 192 code requirements in Attachment 3 for SED's and PHMSA's consideration.

As agreed in the meeting, we are providing the list annotated so the changes being requested now can be readily identified. Further, after additional review it was determined that pipeline drip inspections previously identified and included in the request does not have frequency requirements in the CFR, and therefore are being struck from the request accordingly. This inspection frequency has been established by internal SoCalGas procedures and our exception processes will be used to document and report any compliance deviations in accordance with §192.605(a).

As previously mentioned, SoCalGas continues to complete compliance activities within the required timelines and is not reporting any inability to meet those timelines today. The requested deferral(s), if needed, would not exceed three months, and could be done without introducing a new safety or reliability risk while providing the flexibility to adapt quickly should significant impacts suddenly arise and enabling us to prioritize critical safety and reliability work.

We will continue to communicate with and advise SED of COVID-19 workforce impacts should they occur, including additional requests for specific enforcement relief from SED in the future. Thank you again for your collaboration and continued consideration of our request.

Sincerely,

A handwritten signature in blue ink that reads "Rodger R. Schwecke". The signature is fluid and cursive, with the first name being the most prominent.

Rodger R. Schwecke
Senior Vice President – Gas Operations & Construction

SOUTHERN CALIFORNIA GAS COMPANY

cc:

Rachel Peterson, Acting Executive Director
Lee Palmer, Director, Safety Enforcement Division
Matt Epuna, Program & Project Supervisor, Gas Safety & Reliability Branch
Dennis Lee, Program & Project Supervisor, Gas Safety & Reliability Branch
Steve Intably, Program & Project Supervisor, Gas Safety & Reliability Branch

ATTACHMENT 1

Category	Compliance Activities
2	Above Ground Non-Hazardous Leaks
2	Bridge & Span Inspections
2	Cathodic Protection Inspections, Reads and Troubleshooting
2	Code 3 Leaks (Coming due)
2	Electronic Pressure Monitor Inspections
2	Meter Inspections
2	Pipeline Drip Inspections
2	Pipeline Patrol Inspections
2	Pressure Safety Valve and Relief Valve Inspections
2	Regulator Station/Pressure Liming Station/First Stage Regulator Station Inspections
2	Unstable Earth inspections
2	Valve Inspections

ATTACHMENT 2

Category	Compliance Activities	Applicable CFR Code
2	Above Ground Non-Hazardous Leaks	192.605, 192.703, 192.709
2	Bridge & Span Inspections	192.317, 192.481, 192.613, 192.707, 192.917
2	Cathodic Protection Inspections, Reads and Troubleshooting	192.463, 192.465, 192.467, 192.469, 192.471, 192.473, 192.491, 192.613
2	Code 3 Leaks (Coming due)	192.605, 192.703, 192.709, 192.720
2	Electronic Pressure Monitor Inspections	192.605, 192.739, 192.740, 192.741
2	Meter Inspections	192.353, 192.355, 192.357, 192.461, 192.481
2	Pipeline Drip Inspections	192.477, 192.927
2	Pipeline Patrol Inspections	192.613, 192.705, 192.706, 192.707, 192.721, 192.723
2	Pressure Safety Valve and Relief Valve Inspections	192.605, 192.731, 192.739, 192.741, 192.743
2	Regulator Station/Pressure Liming Station/First Stage Regulator Station Inspections	192.605, 192.739, 192.740, 192.741, 192.743
2	Unstable Earth inspections	192.481, 192.605, 192.609, 192.613, 192.705, 192.709, 192.721
2	Valve Inspections	192.605, 192.709, 192.745, 192.747

ATTACHMENT 3

Category	Compliance Activities	Applicable CFR Code
2	Above Ground Non-Hazardous Leaks	GO112F 143.2(b)(1)(2)(3) 192.605 192.703 192.709
2	Bridge & Span Inspections	192.481(a) 192.317 192.613 192.707 192.917
2	Cathodic Protection Inspections, Reads and Troubleshooting	192.465 (a)(b)(c) 192.467 192.469 192.471 192.473 192.491 192.613 192.463
2	Code 3 Leaks (Coming due)	GO112F 143.2(c)(1) 192.605 192.703 192.709 192.720
2	Electronic Pressure Monitor Inspections	192.605 192.739(a) 192.740 192.744
2	Meter Inspections	192.481(a) 192.353 192.355 192.357 192.461
2	Pipeline Drip Inspections	192.477 192.927
2	Pipeline Patrol Inspections	192.705(a)(b) 192.721(a)(b)(1)(2) 192.613 192.706 192.707 192.723
2	Pressure Safety Valve and Relief Valve Inspections	192.739(a) 192.743(a) 192.605 192.734 192.744
2	Regulator Station/Pressure Liming Station/First Stage Regulator Station Inspections	192.739(a) 192.605 192.740 192.744

Category	Compliance Activities	Applicable CFR Code
		192.743
2	Unstable Earth inspections	192.705(a)(b) 192.721(a)(b)(1)(2) 192.484 192.605 192.609 192.613 192.709
2	Valve Inspections	192.745(a) 192.747(a) 192.605 192.709