

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 6, 2020

Rodger Schwecke, Senior Vice President
Gas Operations and System Integrity
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

SUBJECT: Closure letter for Notice of Probable Violations for SDG&E Non-DOT (NOPV Non-DOT) Reportable incidents issued during the period of 2019-Q2.

Dear Mr. Schwecke,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) has reviewed the San Diego Gas and Electric Company's (SDG&E) responses of February 13, 2020 to the Notice of Probable Violation forwarded to SDG&E on January 14, 2020 for incidents that occurred during the quarter Q2 of 2019.

A summary of findings documented by SED, SDG&E's responses to SED's findings, and SED's evaluation and conclusion of SDG&E's responses taken for each finding is attached with this letter.

This letter serves as an official closure of the **2019 Q2 Non-DOT NOPV** letter for incidents G20180202-2490 in San Diego and G2018-2437 in La Jolla, and any matters that are being recommended for enforcement will be processed through the Commission's Citation program or a formal proceeding. Pursuant to Commission Decision 16-09-055, SED has the authority to issue citations for each violation found.

If you have any questions, please contact Mohammad Ali at (916) 928-2109 or by email at ma5@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

CC: Troy Bauer / SoCalGas
Matt Epuna / SED-GSRB
Mahmoud Intably / SED-GSRB
Kan-Wai Tong / SED-GSRB
Mohammad Ali / SED-GSRB

SUMMARY OF INVESTIGATION FINDINGS

SED Findings: SED identified 2 probable violations as described below:

I. In the NOPV letter dated 1/14/2020, the first violation SED found was that SDG&E violated **49 CFR §192.614(c)(5)** and California Government Code (CGC) **4216.3(a)(1)(A)** as shown below:

1. Title 49 CFR §192.614(c)(5) states in part:

“(c) The damage prevention program required by paragraph (a) of this section must, at a minimum...

(5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.”

2. California Government Code (CGC) 4216.3(a)(1)(A) states in part:

“Unless the excavator and operator mutually agree to a later start date and time, or otherwise agree to the sequence and timeframe in which the operator will locate and field mark, an operator shall do one of the following before the legal excavation start date and time:

(i) Locate and field mark within the area delineated for excavation and, where multiple subsurface installations of the same type are known to exist together, mark the number of subsurface installations.

(ii) To the extent and degree of accuracy that the information is available, provide information to an excavator where the operator’s active or inactive subsurface installations are located.”

On 2/1/2018, a third-party contractor struck and damaged an unmarked 1.25-inch plastic service stub while doing directional boring.

Based on the information gathered, the SDG&E GIS map incorrectly showed the location of the service stub, and the pipeline locator did not produce signal in the field to indicate presence of the stub. SED found SDG&E in violation of 49 CFR §192.614(c)(5) and California Government Code Section 4216.3(a)(1)(A)

SDG&E Response:

SDG&E acknowledges that in this instance the Geographic Information System (GIS) map did not correctly show the location of the service stub. Upon investigation, SDG&E concluded that the stub in question was not correctly mapped in the as-built (‘as constructed’) documentation created by the construction crew when this work was completed several years ago. Consequently, when the as-built drawing data was transferred into the GIS mapping system it maintained the inaccurate location of the stub, and therefore the locator was unaware of its existence. The as-built mapping process has been reviewed and includes supervision oversight and review for as-built map preparation and completion prior to submittal for digitizing into the GIS mapping system. This incident appears to be an isolated event. Nevertheless, SDG&E will continue to monitor the process with supervision oversight to identify improvement opportunities and mitigate this risk.

A GIS mapping update was submitted to correct the error, which included position tie downs to the property line (PL), shortening the stub to five feet in length and adding a “locating ball” to the end of the stub.

SED’s Conclusion:

Upon review of SDG&E’s response, SED agrees that SDG&E adopted the corrective actions by updating SED has reviewed SDG&E’s response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.

II. In the NOPV letter dated 1/14/2020, the second violation SED found was that SDG&E violated **49 CFR §192.353(a)** and **49 CFR §192.605(a)** as shown below.

1. **Title 49 CFR §192.353(a) states in part:**

“(a) Each meter and service regulator, whether inside or outside a building, must be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage that may be anticipated.”

2. **Title 49 CFR §192.605(a) states in part:**

“(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.”

On 4/28/2018, a vehicle struck a meter set assembly (MSA) in an alley resulting in a gas release and interruption of service to 33 customers.

Based on the information gathered, SED found SDG&E in violation of 49 CFR §192.353(a) for failure to protect its gas meter. SED also points out that current SDG&E standard G8145 includes “MSA protection” as an AOC that, if identified, will require issuance of a corrective order.

SDG&E Response:

SDG&E disagrees with the SED assessment that the meter in question was unprotected or identifiable as an Abnormal Operating Condition (AOC). The meter in question is positioned with concrete block walls in close proximity on two sides and located at the base of a stairway leading to a residence (as shown in the photos provided below). Based on this positioning, the meter was considered protected.

Post Incident Installation of Meter Warning Device



Corrective Actions:

SDG&E management will continue to emphasize the importance of the gas standard G8145, Leakage Surveys, Section 4.12.1, “Issue Follow up orders to investigate and correct any AOC’s encountered,” focusing particularly on Section 4.12.1.10 - “When MSA protection (barricades or barriers) are required per gas standard D7115, Barricades for Gas Meter Sets.” In addition, the gas standard D7115 will be updated to provide clarification on when to identify an exposure to vehicular traffic. An information bulletin will be circulated to communicate and reinforce the importance of reporting AOCs while performing leakage surveys/atmospheric corrosion inspections, focusing on instances related to ensuring MSAs are protected as required, per gas standard D7115.

SED’s Conclusion:

SED has reviewed SDG&E’s response and accepts the proposed corrective actions. However, SED disagrees with SDG&E’s narrative that the meter located at [REDACTED], City of La Jolla, San Diego was positioned with concrete block walls and protected. SED’s staff visited the site and talked to the property owner who stated that a meter protection was installed after the meter was hit by a vehicle. SED acknowledges that the proposed corrective actions will sufficiently address the probable violation. SED recommends that no fine or penalty be imposed since the violation did not create any hazardous conditions for the public or utility employees. However, SED may review the implementation of these stated corrective actions during future inspections.