



Troy A. Bauer
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November 02, 2021

Mr. Mahmoud (Steve) Intably, P.E.,
Program and Project Supervisor, Gas Safety and Reliability Branch,
Safety and Enforcement Division,
California Public Utilities Commission,
320 W. Fourth Street, Suite 500
Los Angeles, CA 90013

Dear Mr. Intably:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) submitted the attached Notice of Probable Violations (NOPV) for Non-DOT reportable incident investigations completed in Q3 of 2021.

Attached are Southern California Gas Company's (SoCalGas') 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 blue ink, consisting of a stylized, scribbled name followed by a long horizontal line extending to the right.

Troy A. Bauer
Pipeline Safety and Compliance Manager

CC:

Gwen Marelli, SoCalGas
Terence Eng, SED
Molla Mohammad Ali, SED
Kan-Wai Tong, SED
Claudia Almengor, SED

Non-DOT reportable incident investigations completed in Q3 of 2021

Notice of Probable Violation(s):

1: GO 112-F, §122.2(b)(1)

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Finding	Code Violation(s)
G20200929-3217	9/29/2020	128 S. Camino Los Banos, San Jacinto, Riverside County	SoCalGas	AAA Paving Co.	See Below	GO 112-F, §122.2(b)(1).

On September 29, 2020, at approximately 0900 hours, a third-party contractor, AAA Paving Co, damaged a SoCalGas 3-inch steel main with a grader, resulting in damage to the main, unintentional release of gas, and a service interruption. SED’s investigation found that the incident was caused by a third-party contractor failing to expose the 3-inch SoCalGas steel gas main with hand tools before using a grader. However, SoCalGas did not report this incident to the CPUC until 1413 hours when it had already received 10 odor reports from its customers by 1126 hours on September 29, 2020. Therefore, SED finds SoCalGas in violation of GO 112-F, §122.2 (b)(1) for reporting this incident longer than the 2-hour limit.

SoCalGas Response & Actions:

SoCalGas disagrees that a violation has occurred. This event never reached the threshold of 10 or more calls, meeting the required reporting trigger of GO112-F section 122.2. After the April 2021 Leadership meeting with SED, SoCalGas began rescinding area odor/public attention reports that, in the end, did not meet the criteria, as is the case with this event. Had this process been in place at the time of this incident, we would have requested to rescind this one, as further investigation has revealed we did not have 10 calls that were actually tied to the odor and damage. There were initially 3 calls indicating there was a broken gas line, and one later call related to the odor from the damage, for a total of 4. Other calls that were not close to or related to this event were originally counted, which led to a total of 10. Those were found to be associated with pilot outages and a sewage spill.

At times, SoCalGas, in an effort to be compliant with the regulations, will report incidents and events before the reporting requirements have been met. In this case, the event was reported prior to actually meeting the triggers of GO112-F section 122.2, *“Incidents which have either attracted public attention...”*. GO112F defines public attention as *“any event that escalates to a level that initiates calls/complaints concerning a common safety concern being submitted to an Operator from 10 or more individuals...”*. Further, in an effort to remain compliant with the reporting requirements, SoCalGas now initiates the internal notifications when 8 calls are suspected of meeting the criteria. This practice will alert those with the regulatory reporting responsibility of a potential reportable event before the compliance requirements are met. This is an effort to allow initiation of the reporting to remain compliant. If an event is reported, and later deemed to have not met required reporting triggers, it will be rescinded.

2: GO 112-F, Reference Title 49 CFR, Part 192, §192.604(c)(5) and §192.605(a)

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Finding	Code Violation(s)
G20210505-3216	5/5/2021	1171 Village Dr., Santa Maria, Santa Barbara County	SoCalGas	MGE Underground	See Below	GO 112-F, Reference Title 49 CFR, Part 192, §192.604(c)(5) and §192.605(a)

On May 5, 2021, at approximately 1110 hours, SoCalGas became aware that MGE Underground (MGE), a third-party contractor’s backhoe struck a SoCalGas’ ½-inch PE lateral tee stub at 1171 Village Dr., in Santa Maria, Santa Barbara County. The incident caused an unintended release of gas into the atmosphere. There were no injuries, fatalities, or property damage reported as the result of this incident. The incident was reported to the CPUC when SoCalGas became aware of media coverage. SED found that:

- MGE did have a valid USA ticket at the time of the incident.
- SoCalGas’ Line Locator failed to locate and field mark SoCalGas’ ½-inch PE lateral tee stub in the area of excavation activity, thus in violation of §192.604(c)(5).
- SoCalGas Line Locator failed to contact SoCalGas District Management to inform them that he could not verify SoCalGas’ ½-inch PE lateral tee stub location and additional actions must be taken by the Distribution District to find the exact location. Therefore, SoCalGas is in violation of §192.605(a) for not following its Gas Standard 184.0200, §4.6.9.2.

SoCalGas Line Locator failed to document his attempt to contact MGE to inform them why the DigAlert B211180143 ticket was not marked complete and did not select the applicable EPR Codes that best match the issues. Therefore, SoCalGas is in violation of §192.605(a) for not following its Gas Standard 184.0200, §4.8.1.

SoCalGas Response & Actions:

SoCalGas acknowledges that it failed to locate and mark the half-inch plastic stub at 1171 Village Dr., Santa Maria. The employee working on that USA ticket was not able to find the stub with his locator. The employee then failed to notify management that the stub could not be located, and he did not properly document his actions or issues on the USA ticket.

SoCalGas suspended this employee’s locate and mark operator qualification elements, and he was subsequently re-trained and re-qualified. The employee was counselled on the importance of accurately locating and marking facilities and re-reviewed the Locate and Mark Gas Standard 184.0200. The incident was reviewed with the work group, and employees were reminded of the importance of accurately locating and marking facilities and following procedure.

The repair on 05/05/2021 abandoned the stub, and GIS has been updated to reflect that change. In addition, the abandoned stub information has been updated in Service History.