



Alex Hughes
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August 5, 2022

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 following Notice of Probable Violations (NOPV) for Non-DOT reportable incident investigations completed in Q2 of 2022.

Below is the San Diego Gas & Electric (SDG&E) written response.

Please contact Alex Hughes at (949)697-2539 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", is written over a light gray rectangular background.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

CC:

Gwen Marelli, SoCalGas
Terence Eng, SED
Mohammad Ali, SED
Kan-Wai Tong, SED
Wilson Lule, SED
Jordan Lin, SED
Claudia Almengor, SED

2022 SDGE 2nd Quarter Non-DOT Incident Investigation Response

Violation:

G.O. 112-F, Reference Title 49 CFR, Part 192, § 192.614(c)(5)

On April 28th, 2022, at approximately 1245 hours, SDG&E was notified of a third-party contractor, Schilling Paradise, struck a 0.75-inch steel gas stub with a mini excavator at 4020 44th St, San Diego, San Diego County. This resulted in release of gas into the atmosphere, service interruption, and damage to the gas lines. There were no injuries, fatalities, or third-party damage reported as a result of this incident. This incident was reported to the CPUC due to release of gas and major media coverage. Based on the investigation, SED found that Schilling Paradise had a valid USA ticket at the time of the incident and SDG&E failed to locate and field mark its subsurface installation (0.75-inch steel gas stub) within the area of excavation activity before the start of excavation. Therefore, SED found SDG&E in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, § 192.614(c)(5).

Response:

SDG&E acknowledges that the company locator did not provide an accurate field mark of the one-foot-long stub within the area of excavation. All other subsurface installations were marked within the area of excavation.

Corrective Actions:

SDG&E conducted a full investigation of this incident to determine the cause of the incident, who was responsible, what actions to take next, and what lessons could be learned from it.

The damaged stub was removed from service on Work Order 510000882722 and the GIS map was updated to reflect accurate information.

The locate and mark team has discussed this incident and performed a refresher with all locators on utilizing all available resources when difficult-to-locate subsurface installations such as one-foot stubs need to be marked per measurement.