



Alex Hughes
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August 4, 2023

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 investigation completed in Q1 of 2023.

Below is Southern California Gas' (SoCalGas') written response.

Please contact Alex Hughes at (213)671-1344 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", with a long horizontal flourish extending to the right.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

CC:

Larry Andrews, SoCalGas
Terence Eng, GSRB
Molla Mohammad Ali, GSRB
Sann Naing, GSRB
Claudia Almengor, GSRB

2023 SoCalGas 1st Quarter Non-DOT Incident Investigation

Violation:

G.O. 112-F, Reference Title 49 CFR, Part 192, §192.739(a).

On August 6, 2021, at approximately 0028 hours, an over-pressurization event occurred on SoCalGas' natural gas transmission pipelines, L1021 & L1022 at downstream of SoCalGas' Los Alamitos Pressure Limiting Station (The PLS) that supplies natural gas to a single large volume customer, AES Los Alamitos power generating plant. The Over-pressure was caused by the failures of regulators on the Low-Flow regulation run, which is one of three pressure regulation runs at the PLS. There was no impact or service interruption to the customer as the stepdown regulators, downstream of the PLS, regulated the pressure to the customer. SoCalGas' investigation revealed oily liquids in pilot control gas lines of service and monitor regulators on the Low-Flow run. SED's investigation found that SoCalGas did not add the Low-Flow regulators to the MAXIMO, the SoCalGas' computerized maintenance management system since they were replaced with new Mooney regulators in August 2017. Consequently, SoCalGas missed annual compliance inspections and tests on those regulators. Therefore, SED finds SoCalGas in violations of General Order (G.O.) 112-F, Reference Title 49 Code of Federal Regulations (49 CFR), §192.739(a) for not performing inspections and tests of the Los Alamitos PLS's Low-Flow regulators at intervals not exceeding 15 months, but at least once each calendar year for 2018 to 2021.

SoCalGas Response:

SoCalGas agrees that the Low Flow Mooney regulators were not entered into Maximo until 2021 and that SoCalGas did not record on the work orders the "as found" and "as left" readings for the Low Flow Mooney regulators as required by GS 223.0345. SoCalGas disagrees with the SED determination that SoCalGas did not inspect the Low Flow Mooney regulators. The failure to record the "as found" and "as left" readings was a clerical error. Each work order was signed off by the field technicians which verifies that the equipment was inspected and tested at the station. SoCalGas has changed the procedure for updating Maximo, by updating Gas Standard 223.0375 and requiring a form 3995 from project teams when changes are made to assets. The changes were initiated in September 2019, after the changes were made at Los Alamitos station. The Low Flow Mooney regulators were added to Maximo in 2021.