

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 9, 2023

Non-DOT completed in Q1-2023

Rodger Schwecke,
Senior Vice President and Chief Infrastructure Officer
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

Dear Mr. Schwecke,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) reviewed Southern California Gas Company (SoCalGas)'s response letter dated August 4, 2023, addressing one (1) probable violation identified by SED during its investigation of Non-DOT reportable incident that occurred on August 6, 2021.

Attached is a summary of SED's investigation finding, SoCalGas' response to SED's finding, and SED's evaluation of SoCalGas' response to the probable violation.

This letter serves as official closure of this incident and any matters that are being considered for enforcement will be processed through the Commission's Citation Program or formal proceeding.

Thank you for your cooperation in this investigation. If you have any questions, please contact Molla Mohammad Ali, Senior Utilities Engineer (Supervisor), at (916) 928-2109 or by email at ma5@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Mahmoud Intably".

Mahmoud (Steve) Intably, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

cc: See next page

Alex Hughes, Pipeline Safety and Risk Mitigation Manager
Pipeline Safety and Compliance
Southern California Gas Company
555 West 5th Street
Los Angeles, CA 90013

Larry Andrews, Emergency Strategy & Operations Manager
Southern California Gas Company
555 West 5th Street
Los Angeles, CA 90013

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

M. Mohammad Ali, Ph.D., P.E.
Senior Utilities Engineer (Supervisor)
Gas Safety and Reliability Branch
Safety and Enforcement Division

Matthewson Epuna
Program and Project Supervisor (Regional)
Gas Safety and Reliability Branch
Safety and Enforcement Division

Sann Naing, P.E.
Sr. Utilities Engineer
Gas Safety and Reliability Branch
Safety and Enforcement Division

Claudia Almengor
Associate Governmental Program Analyst
Gas Safety and Reliability Branch
Safety and Enforcement Division

Non-DOT Reportable Incident on August 6, 2021

Identified Probable Violation

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

“(a)Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is ...”

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 (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 found SoCalGas in violation 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 verify 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.

SED’s Conclusion:

SED has reviewed SoCalGas’ response and disagree with SoCalGas’ statement that the new Low-Flow service regulator (Assets ID# 1021-0.00-1-6) and Low-Flow monitor regulator (Asset ID# 1020-5.73-1-7) at Los Alamitos PLS were inspected and tested in accordance with Title 49 CFR §192.739(a)(3) for 2018 to 2021 because SoCalGas failed to produce records supporting that it had inspected and tested them for set pressures to control at the correct pressures per its GS 223.0345. However, SED accepts the corrective action that SoCalGas has articulated and implemented. Furthermore, SED directs SoCalGas to keep the necessary records of its annual test pressures for the Low-Flow service regulator and Low-Flow monitor regulator that demonstrate compliance with Title 49 CFR, Part 192, §192.739(a)(3) and SoCalGas’ GS 223.0345. Moreover, SED may verify the corrective actions during future inspections.

SED was aware that there was no prior occurrence of a similar incident at this regulator station. In addition, SoCalGas took corrective actions as soon as it realized the issue. SED has opted not to impose a fine or penalty at this time.