

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 10, 2024,

SI2023-208

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

Dear Mr. Schwecke:

**SUBJECT:** Southern California Gas Company (SoCalGas) Self-Identified Potential Violation to California Public Utilities Commission (CPUC) that occurred on January 4, 2023, at [REDACTED] Main Street, Delano, California.

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) reviewed Southern California Gas Company's (SoCalGas) response letter dated April 16, 2024, addressing one (1) probable violation identified by SED during its investigation of Self-Identified Potential Violation (SIPV) that occurred on January 4, 2023.

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

This letter serves as official closure 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 Randy Holter, Senior Utilities Engineer-Specialist, at (213) 821-4309 or by email at [randy.holter@cpuc.ca.gov](mailto:randy.holter@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Mahmoud Intably".

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

Attachment "A"

cc: See next page

[REDACTED], Pipeline Safety and Risk Mitigation Manager  
Pipeline Safety and Compliance  
Southern California Gas Company  
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Los Angeles, CA 90013

[REDACTED], Emergency Strategy & Operations Manager  
Southern California Gas Company  
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Terence Eng, P.E.  
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Claudia Almengor  
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## **Self-Identified Potential Violation occurred on January 4, 2023**

### **Identified Probable Violation**

1. **Resolution ALJ-274, Order Instituting Rulemaking 14-05-013, Decision 18-05-023, Appendix A, Rules - Procedures and Appeal Process Procedures; Applicable to Gas Corporations' and Electrical Corporations' Facility Violations; I. Citation Procedures, G. Self-Identified and Self-Corrected Potential Violations, states in part:**

*"2. .... If a gas or electrical corporation voluntarily provides notification of such potential violations to Commission Staff under Rules I.G.3.b.ii and iii, and I.G.3.c.ii and iii, it must do so within 30 days of self-identification of the potential violation. ..."*

2. **Resolution ALJ-274, Order Instituting Rulemaking 14-05-013, Decision 16-09-055, Conclusions of Law, states in part:**

*"21. The gas safety citation program's notification requirement to local officials of self-identified potential violations is modified and should apply to both the gas and electric safety citation programs. Under the modified rule, we will not require the utility to notify city and county officials of a self-identified potential violation unless Staff requires such notification. If Staff so requires, the utility must notify the city and county officials of a potential violation as soon as reasonable and necessary, and no later than 10 days after Staff gives the utility such notice. ...."*

### **SoCalGas's Response**

#### **1. SoCalGas' Corrective Action**

SoCalGas puts public, employee, contractor, and infrastructure safety as its top priority and is dedicated to learning from any event that may occur because of its work activities.

SoCalGas recognizes the need to perform timely reporting. In this case SoCalGas's reporting did not meet Company expectations. To address this, and the original non-compliant event, SoCalGas implemented a variety of corrective actions to prevent reoccurrence and reinforce existing processes. These corrective actions are listed below:

- **Job Suspension:** In January 2023, the SoCalGas GIPP Department initiated a "stop the job" for all construction by ECI crews until a full investigation was performed. This immediate action helped prevent any further safety concerns.
- **Employee Documentation:** SoCalGas submitted the Company required Veriforce® documentation for the two ECI employees involved, to address and record the individual employees' performances. Moving forward, both employee profiles were flagged in case they were to find employment with a different contractor that could potentially perform construction for SoCalGas.

- **Site Inspections:** In Q1, 2023, SoCalGas compiled a list of seven (7) locations that were completed during the time the involved foreman was working in his lead role with no direct oversight from ECI Management or GIPP Inspectors. SoCalGas inspected and leak surveyed the seven (7) locations, and no additional damage or leakage was found.

## **2. SoCalGas' Process Review and Training:**

SoCalGas reviewed its processes and procedures to address the length of time it took for the Pipeline Safety & Compliance department to be made aware, for reporting purposes, of the self-identified potential violation. Under the current process, SoCalGas reviews self-identified potential violations and determines if the potential non-compliance event meets the criteria of CPUC's Gas and Electric Safety Citation Program, before submitting within the required timeframe. If the self-identified potential violation does not meet the criteria, SoCalGas submits a Monthly Exception Report to the SED detailing other minor self-identified non-compliance events. The report is submitted via email to the SED on the 15th of each month.

SoCalGas recognizes the need for continuous refresher training(sic). Therefore, an internal self-reporting process refresher training plan has been developed and implemented. The following course code has been created, *STUGS853- Natural Gas & Electric Safety Citation Program - SCG & SDGE*.

As of January 2024, this training is being conducted alongside the annual SoCalGas Message Center Report (MCR) training(sic) to increase awareness to all employees who have reporting requirements. Besides the five (5) trainings already completed with the MCR trainings, Pipeline Safety & Compliance also conducted six (6) training presentations at various internal departmental meetings and fourteen trainings at recent 2nd party contractor quarterly meetings. Additionally, updates have been made to Gas Standard 183.09, *Reporting Requirements for CPUC Citations and Self-reported Possible Violations*, for process efficiencies and awareness of the available training.

These corrective actions demonstrate SoCalGas's commitment to safety, compliance, and continuous improvement. SoCalGas has taken serious steps to address the violation, prevent future occurrences, and maintain the safety of our operations.

### **SED's Conclusion:**

Pursuant to the Public Utilities Code §2104.5, §2107, §2108, CPUC Resolution ALJ-274, and Decision D.16-09-055 issued September 29, 2016, regarding *R.14-05-013, Order Instituting Rulemaking on the Commission's Natural Gas and Electric Safety Citation Programs*, the SED has considered various factors in investigation of this SIPVR.

#### **1. Regarding SoCalGas' Corrective Actions:**

SED has reviewed SoCalGas's response and determined the remedial actions taken and articulated by SoCalGas are appropriate to the case as presented. SED has opted not to impose a fine or penalty at this time. SED requests SoCalGas to continue to monitor and maintain contractor employee records, qualifications, and flag employee profiles.

2. Regarding **SoCalGas' Process Review and Training:**

SED has reviewed SoCalGas's response and determined the remedial actions taken and articulated by SoCalGas are appropriate to the case as presented. SED has opted not to impose a fine or penalty at this time. SED requests SoCalGas to provide a copy of SoCalGas Gas Standard 183.09, *Reporting Requirements for CPUC Citations and Self-reported Possible Violations*.

**Attachment A**  
**Self-Identified Probable Violation**

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Finding	Code Violation(s)
SI2023-208	1/4/2023	<div style="display: inline-block; width: 30px; height: 15px; background-color: black; vertical-align: middle;"></div> Main Street, Delano CA County: Kern	SoCalGas	N/A	<p>On October 13, 2023, SoCalGas self-reported to the California Public Utilities Commission’s Safety and Enforcement Division (SED), an incident that triggered a potential violation report (PVR) under the California Public Utilities Commission’s Gas and Electric Safety Citation Program and SoCalGas’s Gas Standard 183.09, Reporting Requirements for CPUC Citations and Self-Reported Possible [Potential] Violations.</p> <p>SED’s investigation found that SoCalGas failed to notify the SED of this potential violation within 30 days as specified in R.ALJ-274, OIR.14-05-013, D.18-05-023, Appendix A, Rules - Procedures and Appeal Process Procedures; Applicable to Gas Corporations’ and Electrical Corporations’ Facility Violations; I. Citation Procedures, G. Self-Identified and Self-Corrected Potential Violations, Item 2; and SED’s investigation found that SoCalGas delayed its self-reporting for over nine (9) months, an extended period of time that precluded SED from making an informed decision to require SoCalGas to notify city and county officials, per R.ALJ-274, OIR.14-05-013, D.16-09-055, Conclusions of Law, Item 21.</p>	Public Utilities Code §2104.5, §2107, and §2108, Reference ALJ-274, OIR 14-05-013, D.18-05-023 and D.16-09-055