

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 9, 2023,

GI-2022-04-SCG-44-15

Mr. 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 (CPUC) reviewed Southern California Gas Company (SoCalGas)'s response letter dated August 12, 2022, that addressed one (1) area of concern identified during **General Order (G.O.) 112-F Comprehensive Operations and Maintenance Inspection of Southern California Gas Company (SoCalGas)'s Goleta Storage Facility** conducted from April 18 through 22, 2022.

Attached is a summary of SED's inspection findings, SoCalGas' responses to SED's findings, and SED's evaluation of SoCalGas' responses to the findings.

This letter serves as the official closure of the 2022 Comprehensive Operation and Maintenance Inspection of SoCalGas' Goleta Storage Facility.

Thank you for your cooperation in this inspection. If you have any questions, please contact Wilson Lule, Utilities Engineer, at (213) 392-4965 or by email at wkl@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "ME" or similar initials.

Matthewson Epuna
Program & Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

CC: Alex Hughes, SoCalGas
Kan Wai Tong, SED/GSRB
Molla Mohammad Ali, SED/GSRB
Claudia Almengor, SED/GSRB

Post-Inspection Written Preliminary Findings

Date of Transmittal: 04/26/2022

Dates of Inspection: 4/18-22/2022

Operator: SOUTHERN CALIFORNIA GAS CO

Operator ID: 18484 (primary)

Inspection Systems: Gas Transmission

Assets (Unit IDs) with results in this report: Goleta - Storage Facility (87077)

System Type: GT

Inspection Name: Goleta Gas Storage Audit

Lead Inspector: Wilson Lule

Operator Representative: Austin Walker & Edwin Baires

Unsatisfactory Results

No Preliminary Findings.

Concerns

Time-Dependent Threats: External Corrosion - Cathodic Protection (TD.CP)

Question Title, ID	Isolation from Other Metallic Structures, TD.CP.ELECISOLATE. O
Question	14. Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?
References	192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))
Assets Covered	87077
Issue Summary	<p>In the work order #7399927, Line 5026-AN, pipe to soil reading at More 1 Well location was shown as 0.001 volt, which should be within 0.85 and 2.0 volts. A pipe-to-soil (PS) taken during a later field visit to this location read -719 mV. SoCalGas indicated that this location was abandoned. However, CP readings (of -719mV) at the point indicated that the pipe may still be electrically connected to the system.</p> <p>SoCalGas should take appropriate steps to demonstrate that the abandoned line is electrically isolated from the Cathodic Protection System or provide documentation to show that the 719mV is the native pipe to soil read of Line 5026-AN.</p>

SoCalGas' Response:

Yes, measures are performed to ensure electrical isolation, however electrical isolation is not applicable in this instance because the More 1 kill lines were not abandoned or removed as noted below on follow up work order #7459776, nor were they electrically isolated from the cathodic protection system at the time of the audit in April 2022. The More 1 kill lines remain in service and are part of the cathodic protection system.

The follow-up Maximo work order #7459776 created on October 13, 2020, indicates that pipe at this location has been removed/abandoned. There was pipe removed from this area; however, it was not associated with the More 1 well as noted in the work order but was associated with Goleta 1 well location and its piping. The Goleta 1 well kill lines which were removed along with all the other piping during abandonment of Goleta 1 well. A temporary rig on site may have prevented further investigation to confirm field observations.

On October 14, 2020; a CP read of -0.001V (-1mV) was recorded on Maximo work order #7399927 for GOL-5026~0.28-P. This -1mV value is not an actual reading. It is a method in which we denote inaccessibility to a location. This process is an acceptable work practice per the gas standard noted below. While completing work related to the original work order #7399927 the employee was not able to access the More 1 well location due to a temporary rig on site as noted above.

Gas Standard 186.0135 (Section 4.3.1.1.) states: *Record a read of -0.001V for a test point and -0.001A for a bond read found to be paved over, missing, damaged or otherwise inaccessible and unreadable.*

This generates a troubleshoot order used to track the identification, repair, or change of the monitoring location. Issue MAXIMO follow-up order to correct deficiency.

The recorded pipe-to-soil (PS) reading of -0.719V (-719mV) was taken on the associated kill lines for More 1 well location on April 20, 2022, during the CPUC field observations. SoCalGas has taken the following actions to correct the out-of-tolerance CP read at the More 1 well location:

- Installed a sacrificial anode for the More 1 well kill lines
- Replaced the existing bond box at More 1 well location with a new CP bond box
- Recorded a pipe-to-soil (PS) CP read for the More 1 well kill lines, -1.699V (-1,699mV)
 - *This data was previously communicated to the CPUC on July 5, 2022*
- Recorded a current read of 1.8A at the More 1 well casing
 - *This data was previously communicated to the CPUC on July 5, 2022*

SED Response:

SED has reviewed SoCalGas' response and accepts the corrective action that it has articulated and implemented.