



Alex Hughes
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September 28, 2022

Mr. Terence Eng, P.E.,
Program Manager, Gas Safety and Reliability Branch,
Safety and Enforcement Division,
California Public Utilities Commission,
505 Van Ness Ave, 2nd Floor
San Francisco, CA 94102

Dear Mr. Eng:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order (G.O.) 112-F Comprehensive Operation and Maintenance Inspection of Southern California Gas Company (SoCalGas)'s NW San Joaquin Valley Distribution Area (Inspection Unit) on May 2 through May 6, 2022. SED used the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety's "Inspection Assistant Form" as a reference guide to conduct the inspection. The inspection included a review of SoCalGas' records from calendar years 2018 to 2021 and field inspections of pipeline facilities in the Bakersfield, Hanford, Porterville, and Visalia Distribution Districts. SED's staff also reviewed the implementation of the Operator Qualification program, which included field observation of randomly selected individuals performing covered tasks.

SED staff identified nine (9) areas of concern. Attached are SoCalGas' written responses.

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", with a long horizontal flourish extending to the right.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

CC:

Gwen Marelli, SoCalGas
Gordon Kuo, SED/GSRB
Kan-Wai Tong, SED/GSRB
Mahmoud (Steve) Intably, SED/GSRB
Claudia Almengor, SED/GSRB

2022 SoCalGas San Joaquin Valley Audit Response

Violation(s)

None

Concern(s)

1. Records: Operations and Maintenance (PRR.OM)

Question: 36. Do records indicate equipment used in joining plastic pipe by heat fusion was maintained in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?

References: 192.603(b) (192.756)

Assets Covered: Northwest - San Joaquin Valley (87048 (65))

Issue Summary: Per SoCalGas, there are no requirements for taking pictures or other methods of capturing and maintaining records of equipment used in joining plastic pipe by heat fusion. While SoCalGas and SED acknowledge that GS 184.0130 requires employees to use approved and calibrated IR thermometers, there is no method outlined in the written procedures to keep track of which IR thermometer was used for a given project. Without the ability to track IR thermometers used in a given construction project, the IR thermometers' calibration records cannot be provided for review. Accordingly, IR thermometer calibration records were not provided for review during the inspection for projects such as Notification# 2040914037.

SED recommends SoCalGas to develop and implement record keeping requirements to identify and record specific information (e.g. Capital Tool number, calibration date) for calibrated equipment used in any given plastic pipe joining such as an additional form for plastic pipe joining records or another set of work records

Response & Actions:

SoCalGas is exploring both interim and longer-term solutions to capture information related to plastic joiners and type of joints, and is evaluating what types of data to capture, such as capital tools used. Identifying and selecting a viable solution includes many considerations. Some of which include: technology reviews, training requirements, changes/impacts to current workforce procedures, overall risk analysis, deployment options and system sustainability with increased data entry/storage. Another key discussion topic revolves around data security/accuracy because non SoCalGas employees (contractors) who perform these tasks will also be involved with this new solution. SoCalGas will continue the analysis and planning efforts and report back with a status update to SED by end of year (2022).

2. Pipeline Field Inspection: Pipeline Inspection (Field) (FR.FIELDPIPE)

Question: 17. Do field observations confirm impressed current sources are properly maintained and are functioning properly?

References: 192.465(b)

Assets Covered: Northwest - San Joaquin Valley (87048 (65))

Issue Summary: On 5/5/2022, SED observed a field inspection of SoCalGas' cathodic protection systems. SED found that read point M00 of cathodic protection area (CPA) SL563-003 was -0.544 V, which was less negative than the -0.850 V requirement listed in Appendix D to 49 CFR Part 192. SoCalGas was able to raise the read to -0.719 V after adjusting its rectifier settings. After further diagnosis of the rectifier anodes by SoCalGas on 5/11/2022, SoCalGas planned to install a new deep well anode pit to bolster the cathodic protection current for the CPA. SED requests a copy of the work plan and/or work progress from SoCalGas regarding its permanent remediation of this cathodic protection deficiency for future reference.

Response & Actions:

Please note that the name of the cathodic protection area visited on 05/05/2022 was SL563-006, and the measurement taken at Read Point M00 was -0.507 V. M00 is a 100mV polarization read point, and the read tolerance limit is -0.544 V.

This area was brought into tolerance on 05/12/2022, after a technician adjusted the rectifier settings, and the measurement taken at Read Point M00 was -0.719V. In addition to adjusting the existing rectifier settings, SoCalGas is also planning a new deep well as a long-term solution. Planning is in progress, and the notification number for the project is 2042158856.

3. Pipeline Field Inspection: Pipeline Inspection (Field) (FR.FIELDPIPE)

Question: 22. Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?

References: 192.473(a)

Assets Covered: Northwest - San Joaquin Valley (87048 (65))

Issue Summary: On 5/4/2022, SED observed that SoCalGas CPA SL 151-2 in the Bakersfield district, which contains a critical interference bond, was found to be down. SED requests SoCalGas to promptly take remedial actions for this CPA.

Response & Actions:

Cathodic Protection Area SL151-2 was brought into tolerance on 06/24/2022, after installing an anode for supplemental current.

4. Generic Questions: Generic Questions (GENERIC.GENERIC)

Question: 1. Generic question - please provide context in result notes.

References: N/A

Assets Covered: Northwest - San Joaquin Valley (87048 (65))

Issue Summary: 1. During several leak surveys, SED observed the discovery of several leaks at the following addresses. Please provide the follow-up work orders for these leaks.

- [REDACTED] Lemoore (Leak survey map 99-52)

- [REDACTED] Lemoore (Leak survey map 99-52)

- [REDACTED] Lemoore (Leak survey map 99-52)

- [REDACTED] Porterville (Leak survey map 72-89)

- [REDACTED] Porterville (Leak survey map 72-89)

2. On 5/4/22, M&R field personnel were unable to fault two GMI units used at DRS ID 6297 and field tested at EPM ID 44003 in the Bakersfield district. On 5/6/22, SoCalGas stated both GMI Gasurveyors used by SoCalGas employees 63912 and 57526 (Tag 117970) were unable to show fault while conducting glove test and sent to Pico for further examination. SED would like to request a brief update on SoCalGas' findings and whether the condition encountered were caused by an isolated or systemic cause.

Response & Actions:

1. All of the leaks identified have been repaired. Below are the leak repair dates and order numbers:

- [REDACTED] Lemoore was repaired on 05/05/2022 on order 1576193476.

- [REDACTED] Lemoore was repaired on 05/05/2022 on order 2101379711.

- [REDACTED] Lemoore was repaired on 09/01/2022 on order 520003147370.

- [REDACTED] Porterville was repaired on 07/22/2022 on order 520002836510.

- [REDACTED] Porterville was repaired on 06/07/2022 on order 520002836512.

2. GMI units were sent to the instrument shop for inspection. One of the units (117967) was cleaned, had the pump resealed, and was calibrated on 05/25/2022. The other unit (117970) had a new pump installed and was calibrated on 05/25/2022. Both units have been working properly since.