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March 18<sup>th</sup>, 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

SUBJECT: SDG&E responses - General Order (G.O.) 112-F Compliance Inspection of San Diego Gas and Electric Company's Borrego Springs Liquid Natural Gas Facility

Dear Mr. Eng:

The Safety Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F inspection of San Diego Gas and Electric Company's (SDG&E) Borrego Springs Liquid Natural Gas (LNG) Facility and associated Roadrunner Springs Community gas distribution system on October 26 through 28, 2021. The inspection included a review of SDG&E's records from calendar years 2018 to 2020. SED staff reviewed SDG&E's written procedures and conducted a field observation pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (CFR), Parts 191, 192, and 193.

SED staff identified six (6) concerns on the LNG portion of the inspection. Five (5) concerns indicated no further response required from SDG&E.

Attached is SDG&E's written response to the remaining SED inspection finding.

Please contact Alex Hughes at (949)697 2539 if you have any questions or need additional information.

Sincerely,

Troy A. Bauer  
Pipeline Safety and Compliance Manager

CC:

Gwen Marelli, SoCalGas  
Matthewson Epuna, SED  
Kan Wai Tong, SED  
Michelle Wei, SED  
Claudia Almengor, SED

## **Concern:**

### **Records: Operating (PRR.OPS)**

Question. Do records show that LNG transfers were conducted in accordance with requirements?

References: 193.2513(a) (193.2513(b))

Assets Covered: Borrego Springs LNG (87076 (45))

### **Issue Summary:**

During the 2018 inspection SED recommended that the transfer and fill forms be updated to include a summary of the necessary steps taken to help ensure that employees were verifying that each step of the process was followed. SDG&E created these new forms and submitted them for review in 2018 and SED approved them. However, upon reviewing the 2018-2020 records during this inspections SED noted that SDG&E was not using the new forms. SED is concerned that SDG&E is not using the improved forms.

During the audit, SDG&E stated that the intention was to transfer these forms to a virtual format. On December 1, 2021, SDG&E provided a copy of the planned virtual forms that are similar to the new forms. SED agreed that the virtual forms, as shown would meet the intent of the original recommendation. However, SED would still like SDG&E to respond and explain its rationale for using the old forms and the timeline for switching to the virtual ones.

## **Response & Actions:**

### **Response:**

SDG&E agrees with SED's findings that we did not use the new transfer and fill forms consistently since the updated version was created post audit in 2018. There were different versions of those forms available to the field personnel and the need to use updated forms were inconsistently communicated to technicians.

### **Actions:**

A new management process has been implemented to ensure all future updates to forms are communicated efficiently. SDG&E converted the SED agreed version of the forms to a digital format accessible from a mobile application and started using the virtual forms exclusively in January of 2021. Technicians performing these activities at Borrego were trained to use the mobile application and are instructed to only use the virtual version of the updated forms. Beginning January 2021, Supervision is only accepting electronic versions of SED-approved forms for review and will no longer accept paper versions.