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May 13, 2020

Mr. Terence Eng
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 (CPUC) submitted a Notice of Probable Violation (NOPV) to San Diego Gas & Electric (SDG&E) related to its investigation of the Department of Transportation reportable incident #1268754, which occurred on August 22, 2019. Attached is SDG&E's written response to SED's NOPV.

Please contact Troy A. Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to be 'T. Bauer', is written over a horizontal blue line.

Troy A. Bauer
Pipeline Safety & Compliance Manager

CC:
Mahmoud Intably, SED
Kan-Wai Tong, SED
Claudia Almengor, SED

DOT Reportable Incident (#1268754) that occurred on August 22, 2019

1) General Order 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, Section 192.605 states in part:

General. Each operator shall prepare and follow for each pipeline a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. The manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

1.1 SDG&E's Gas Standard G8123 Underground Service Alert and Temporary Markings, Section 6.3 states in part:

"If there is any confusion with the USA ticket information or delineation has not been provided at the ticket location, then the locator will contact the excavator to accomplish the following:

6.3.2. Obtain from the excavator a clear description of where the marks are needed."

During an SED interview with SDG&E on September 10, 2019, an SDG&E employee stated he found no delineation marks in the proposed excavation area. Based on his understanding of the description of the location provided on the USA ticket, he located and marked some of SDG&E's facilities but failed to locate and mark the 1 ¼-inch steel gas service line. In addition, he stated that he did not contact the excavator to obtain a clear description of where the marks were needed. SED found SDG&E failed to follow its Gas Standard G8123, Section 6.3 which required the operator to contact the excavator to determine the extent and location of the excavation and to obtain a clear description of where the marks were needed. Therefore, SED finds SDG&E in violation of 192.605(a) for failure to follow its own Gas Standard.

SED found one (1) instance in which the SDG&E employee failed to follow and comply with the requirement stated in SDG&E Gas Standard and thus 192.605(a). Therefore, SED found SDG&E committed a total of one (1) violation of General Order 112-F, which incorporates Title 49 CFR, Part 192 by reference.

SDG&E Response:

SDG&E disagrees with SED's assessment that SDG&E failed to follow its Gas Standard G8123, Underground Service Alert and Temporary Markings, Section 6.3 based on the following investigation and facts. On August 22, 2019 a Naton Engineering excavation crew damaged an SDG&E service line causing a gas leak. Investigation of the damage site showed no visible delineation. The site did have utility mark outs provided by Cable, Pipe & Leak, a private marking company, based on flags with their company name (See Image 9 below). No SDG&E or Utiliquest employee marked this location. During the damage investigation it was found that Naton Engineering indicated their work was

covered under USA Ticket #A1912341234 (Images 1 and 2 below). This claim by Naton Engineering was determined to be incorrect. Instead, the ticket that covered the area of the damage was actually USA Ticket #A191060668 (Images 5 and 6 below). The USA Ticket #A191060668 was not Naton Engineering's ticket and had expired on July 4, 2019 well before Naton Engineering damaged the service.

In SDG&E's post incident investigation Naton Engineering provided USA Ticket #A1912341234 and claimed their excavation was authorized under the USA Ticket #A1912341234. Delineations for USA Ticket #A191341234 were provided under the initials "PBG" for Naton Engineering's general contractor, Pacific Building Group. (Please see Images 1, 2, 7, 8 and 9 below for pictures showing USA Ticket #A1912341234 detail report and "PBG" delineations). Thus, the Utiliquest employee did not need to communicate with the excavator as he marked according to "PBG" delineations and USA Ticket #A191341234 information. Naton Engineering damaged the gas service line more than 300 feet from the work location as described on USA Ticket #A191341234 and the delineations under "PBG" (See Images 3 and 4 below).

In preparation to respond to SED's Notice of Probable Violation, SDG&E investigated USA tickets in the general area of [REDACTED] requested by the general contractor, Pacific Building Group (PBG). It was discovered that Pacific Building Group had requested USA Ticket #A191060668 applicable to the area where the damage occurred. USA Ticket #A191060668 was requested on April 16, 2019, then was renewed twice, and finally expired on July 4, 2019. This ticket was not valid on the day of the subject damage incident occurring on August 22, 2019. Naton Engineering themselves did not have a valid USA ticket for the area where they were excavating, and where the incident occurred. As the post incident interview indicates Naton Engineering construction plans did not show a 1 ¼-inch steel gas service. Please note that the information related to the gas and electric facilities in those plans were neither requested from nor provided by SDG&E. SDG&E did not, nor were they requested to, review those plans for accuracy.

USA Ticket #A191060668 states the following as work location:

X/ST1: ZOO PL
W/SIDE OF ZOO DR AT APPROX 257FT S/E OF ZOO PL WITHIN THE SAN
DIEGO ZOO **ALT CONTACT IS [REDACTED] AT [REDACTED] ** ** NO
MARKS NEEDED** [emphasis added] **PLEASE CALL [REDACTED] AT [REDACTED]
UPON ARRIVAL OR IF YOU HAVE ANY QUESTIONS** **DELINEATED WITH
PBG/USA**

On April 18, 2019, Utiliquest's notes show "called [REDACTED] with no answer".

On April 19, 2019, Utiliquest's notes show "Called and spoke with site contact [REDACTED] Site phone [REDACTED] who confirmed that work was only being done inside the San Diego Zoo. No sdge, gas, sdge electric, cox or att-d within zoo."

Therefore, the Utiliquest employee did adhere to the request made on the USA Ticket #A191060668 by calling and did follow company procedures. The location where the incident occurred was not covered by USA Tickets #A191341234 (300' from excavation site) and USA Ticket #A191060668 was expired and no longer valid on the date of the incident caused by Naton Engineering.

Ticket Detail Report

Ticket Number A191341234



Locate Request For SDG01

Ticket Number	Message Type	Previous Ticket	Sequence
A191341234	RNEW NORM POLY	N/A	124

Work Information

Work Address	OLD GLOBE WAY SAN DIEGO, CA SAN DIEGO	Intersection	VILLAGE PL
		Duration	N/A
Work Date	8/6/2019 10:07:00 AM	Expiration Date	9/3/2019 11:59:00 PM
Nature of Work	DEMO OF BLDGS & CLEAR/GRUB OF VEGETATION	Explosives	No
White Paint	Yes	Right of Way	No
Mapsco	N/A	Boring	No
Done For	PACIFIC BUILDING GROUP	Legal Given	No
Meet Date	N/A	Mobile ID	CMU01
Project	No	Map No	N/A
Status	COMPLETED	Zone ID	CM01
Depth	N/A	Map Ref	N/A
Transmit Date	8/6/2019 10:07:38 AM	Due Date	8/6/2019 10:07:00 AM
Original Call Date	8/6/2019 10:07:00 AM	Assigned Date	8/6/2019 11:11:58 AM
Send Date	N/A	Work to Begin Date	8/6/2019 10:07:00 AM

Image 1: USA Ticket #A191341234 was done for Pacific Building Group (PBG).

Company Information

NATON ENGINEERING		Contact	Contact Phone
[REDACTED]		[REDACTED]	[REDACTED]
		Contact Email	
Company Phone	Company Fax	N/A	
760-731-9000	N/A	Callback	
Alt Contact	Alt Phone	N/A	
N/A	N/A		

Location Points

LATLONG	32.73307500000	-117.14972200000	DIG BOX
LATLONG	32.73364400000	-117.14718500000	DIG BOX
LATLONG	32.73259300000	-117.14694900000	DIG BOX
LATLONG	32.73202500000	-117.14948700000	DIG BOX

Additional Members

ATTDSOUTH BPOC COX01 NEXTGLAVE N SDG01 SND01

Image 2: USA Ticket #A191341234 Detail Report that shows Naton Engineering as a requestor and work to be completed for Pacific Building Group.



Image 3: Picture taken on Old Globe Way facing North at intersection of Village Place on May 17, 2019 during mark out. PGB USA mark stenciled to left of light post. This

picture is for Naton Engineering's USA Ticket #A1912341234, which is approximately 300 feet from incident area.

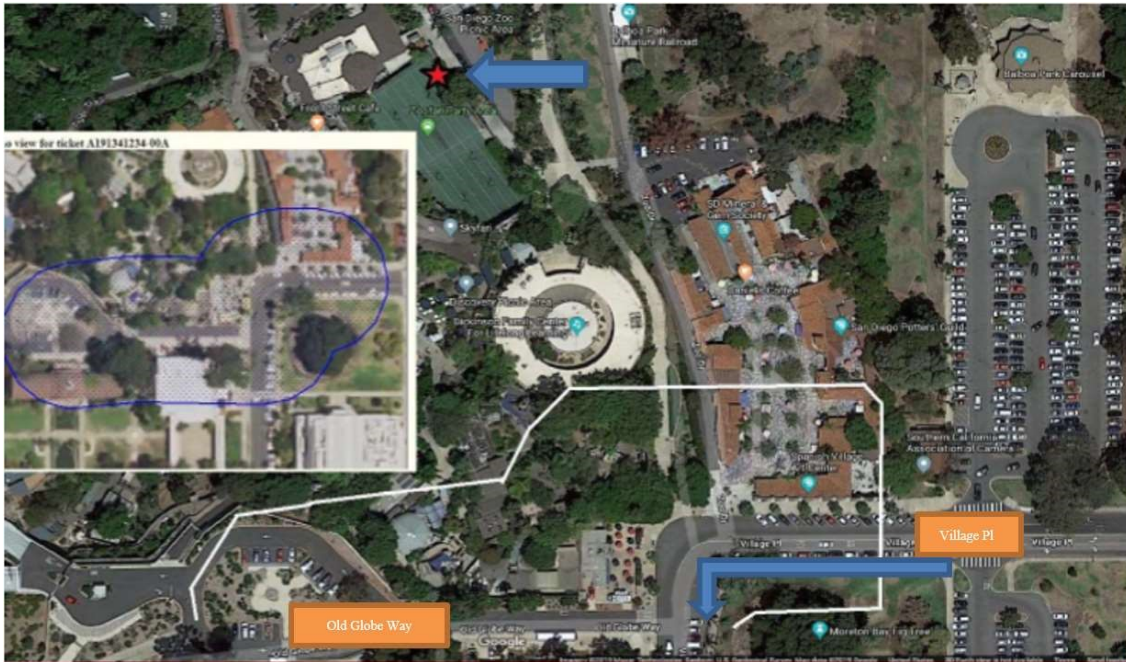


Image 4: Depicts area covered by Naton Engineering's USA Ticket #A1912341234 which notes work location: Old Globe Way Intersection: Village Pl. (the boxed area) The Red Star is the approximate damage location, about 300 feet north from boxed area.

Ticket Detail Report

Ticket Number A191060668



Locate Request For SDG01

Ticket Number	Message Type	Previous Ticket	Sequence
A191060668	RNEW NORM POLY	N/A	125

Work Information

Work Address	ZOO DR SAN DIEGO, CA SAN DIEGO	Intersection	ZOO PL
		Duration	N/A
Work Date	6/6/2019 10:31:00 AM	Expiration Date	7/4/2019 11:59:00 PM
Nature of Work	NEW CONST	Explosives	No
White Paint	Yes	Right of Way	No
Mapsco	N/A	Boring	No
Done For	SAN DIEGO ZOO	Legal Given	No
Meet Date	N/A	Mobile ID	CMU01
Project	No	Map No	N/A
Status	COMPLETED	Zone ID	CM01
Depth	N/A	Map Ref	N/A
Transmit Date	6/6/2019 10:33:55 AM	Due Date	6/6/2019 10:31:00 AM
Original Call Date	6/6/2019 10:31:00 AM	Assigned Date	6/6/2019 10:35:20 AM
Send Date	N/A	Work to Begin Date	6/6/2019 10:31:00 AM

Work Location

X/ST1: ZOO PL
 W/SIDE OF ZOO DR AT APPROX 257FT S/E OF ZOO PL WITHIN THE SAN DIEGO ZOO **ALT CONTACT IS [REDACTED] AT [REDACTED] * **NO MARKS NEEDED** **PLEASE CALL [REDACTED] AT [REDACTED] UPON ARRIVAL OR IF YOU HAVE ANY QUESTIONS** **DELINEATED WITH PBG/USA**
 1 YEAR: N BORING: N STREET/SIDEWALK: Y VACUUM: N EXPLOSIVES: N

Company Information

PACIFIC BUILDING GROUP

9752 ASPEN CREEK CT SUITE 150
SAN DIEGO, CA 92126

Contact

[REDACTED]

Contact Phone

[REDACTED]

Contact Email

Company Phone

[REDACTED]

Company Fax

N/A

N/A

Callback

Alt Contact

N/A

Alt Phone

N/A

N/A

Location Points

LATLONG	32.73503100000	-117.14899600000	DIG BOX
LATLONG	32.73487300000	-117.14804700000	DIG BOX
LATLONG	32.73407000000	-117.14818000000	DIG BOX
LATLONG	32.73422800000	-117.14913000000	DIG BOX

Additional Members

ATTD SOUTH BPOC SDG01 SND01

Image 5: USA Ticket #A191060668 Detail Report that shows Pacific Building Group as a requestor, work to be completed for San Diego Zoo, the note "NO MARKS NEEDED" and direction to contact [REDACTED] upon arrival.

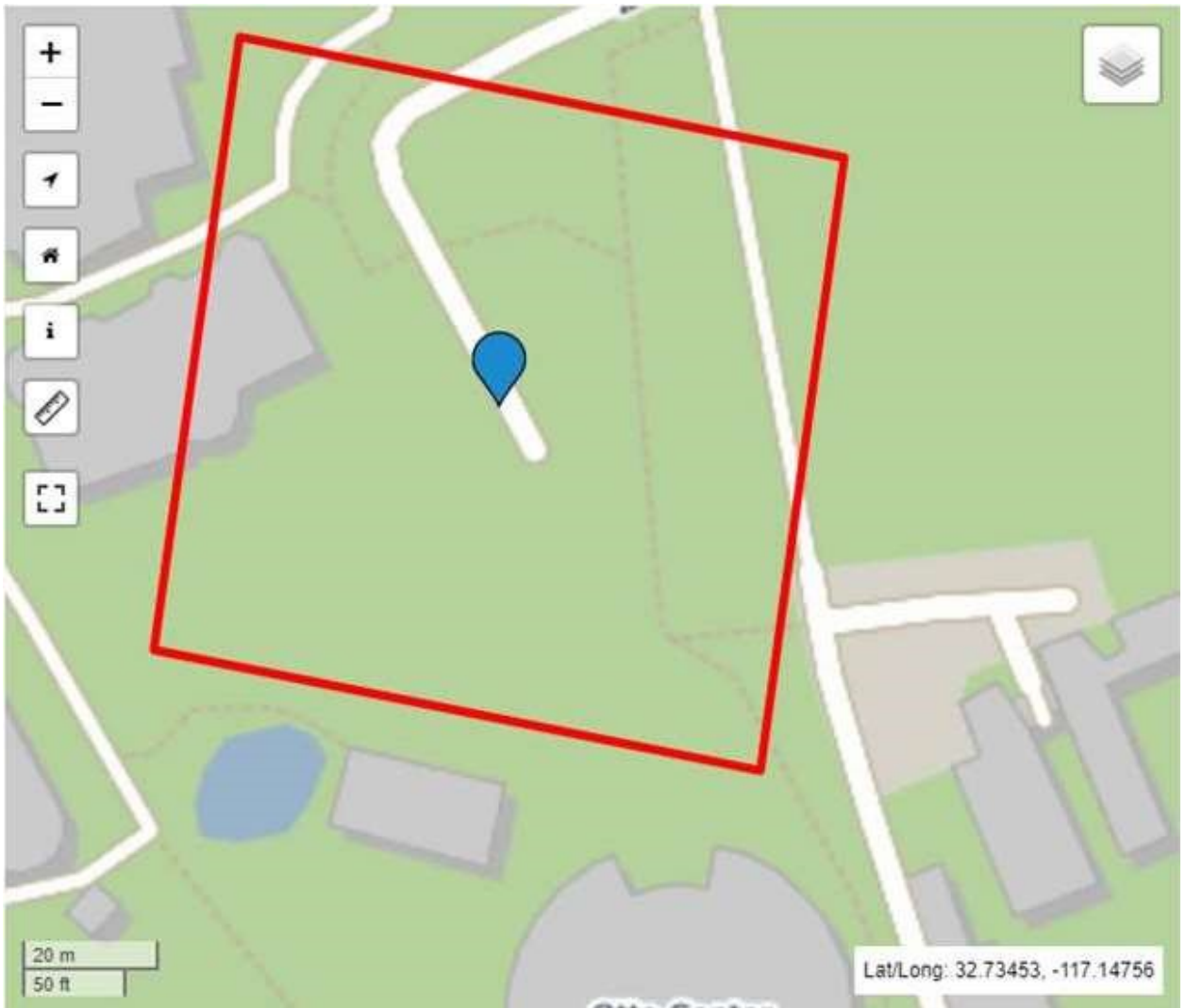


Image 6: Depicts area covered by PBG's expired USA Ticket #A191060668. Damage occurred in this area.



Image 7: Marks in area described on expired USA Ticket #A191060668 believed to be provided by Cable, Pipe and Leak locating employees.



Image 8: Flags in area described on expired USA Ticket #A191060668 labeled Cable, Pipe and Leak.



Image 9: Close up of Cable, Pipe and Leak Flag.