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November 03, 2021

Mr. Mahmoud (Steve) Intably, P.E.,  
Program and Project Supervisor, Gas Safety and Reliability Branch,  
Safety and Enforcement Division,  
California Public Utilities Commission,  
320 W. Fourth Street, Suite 500  
Los Angeles, CA 90013

Dear Mr. Intably:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) submitted the attached Notice of Probable Violations (NOPV) for Non-DOT reportable incident investigations completed in Q3 of 2021.

Attached are San Diego Gas and Electric's (SDG&E's) written responses.

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, consisting of a stylized, cursive name with a long horizontal line extending to the right.

Troy A. Bauer  
Pipeline Safety and Compliance Manager

CC:

Gwen Marelli, SoCalGas  
Terence Eng, SED  
Molla Mohammad Ali, SED  
Kan-Wai Tong, SED  
Claudia Almengor, SED

**Non-DOT reportable incident investigations completed in Q3 of 2021**

**Notice of Probable Violation(s):**

**1: G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a) and §192.614(c)(5).**

<b>PUC ID</b>	<b>Date</b>	<b>Address</b>	<b>Utility</b>	<b>Third Party Entity</b>	<b>Investigative Finding</b>	<b>Code Violation(s)</b>
<b>G 20210305-3182</b>	<b>3/5/2021</b>	<b>████ 32nd Street, San Diego, San Diego County</b>	<b>SDG&amp;E</b>	<b>N/A</b>	<b>SEE BELOW</b>	<b>G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a) and §192.614(c)(5).</b>

On March 5, 2021, at approximately 0811 hours, SDG&E’s contractor, SE Pipeline Construction (SE Pipeline) was excavating using a backhoe when it damaged an SDG&E’s 1-inch steel drip line, causing an unintentional release of natural gas into the atmosphere and a service interruption to 19 customers for approximately 17 hours. There were no fatalities, injuries, or fire reported as the result of this incident.

SED found that:

- SDG&E’s employee failed to use hand tools within the tolerance zone to determine the exact location of the 1-inch steel drip line as required by its Gas Standard G7451, §1.1. Therefore, SDG&E is in violation of §192.605(a) for not following its Gas Standard G7451, §1.1
- SDG&E’s employee failed to provide accurate temporary field marking for the 1-inch steel drip line and temporary field marking for the 12-inch steel drip pan. Therefore, SDG&E is in violation of §192.614(c)(5) for failure to provide temporary marking of its buried pipelines in the area of excavation.

**SDG&E Response & Actions:**

SDG&E values the safety of the public and strives to learn from any incident. SDG&E acknowledges SED’s evaluation of the incident on 3/5/2021 at █████ 32nd St. in San Diego

SDG&E investigated the incident to determine why it occurred, who was responsible, and what actions to take next. On 3/19/2021, SDG&E and SE Pipeline Construction representatives had a meeting to discuss the incident, mitigation measures, and expectations moving forward. SE Pipeline agreed with the SDGE Investigation Team’s findings and recommendations. SE Pipeline provided detailed corrective measures with a schedule for completion of training for employees companywide.

- When potholing by hand and utilities are not found, SE Pipeline will ensure remarks are called in for clarification.
- At no time will mechanized equipment be used to excavate without first verifying all substructures in the area.
- SE Pipeline had an all-hands employee safety stand down on March 9, 2021, to go over the SDG&E Gas Standard G7451, Golden Shovel, and California Code 4216.
- On March 16, 2021, all SE Pipeline employees (gas division) received a refresher on the Gold Shovel program

SDG&E understands the importance of accurate field marking for potholing prior to excavation to verify utility accuracy. SDG&E acknowledges that the temporary markings of some components of the oil drip were not accurate. The locator could not accurately locate all drip line components because, historically, some oil drip locations and configurations were not consistently captured on legacy facility maps. As a result, SDGE is removing select oil drips as part of the 2019 GRC approved RAMP (Risk Assessment Mitigation Program).

**Corrective Actions:**

- Internal communications were sent to all impacted groups. The communications clarified the generic purpose and historic design variations of oil drip lines, and provided an explanation of the risks associated with the removal of these facilities.
- Locate & mark supervision communicated the general schematic and concept of an oil drip line with all company locators during their safety meeting.

**2: G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a)**

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Finding	Code Violation(s)
G20210329-3198	3/29/2021	████ Merritt Blvd., La Mesa, San Diego County	SDG&E	N/A	See Below	G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a)
<p>On March 29, 2021, at approximately 1344 hours, SDG&amp;E crews struck their own 3/4-inch steel service with a backhoe at █████ Merritt Blvd, La Mesa when they were excavating to install new gas service line. SED’s investigation found that this dig-in incident was caused by SDG&amp;E failing to follow the SDG&amp;E’s Gas Standard, G7451, § 4.3.3.1, and expose the properly marked SDG&amp;E gas service line with hand tools prior to using power-driven excavation equipment within the tolerance zone. Therefore, SED finds SDG&amp;E in violations §192.605 (a) for not following its Gas Standard G7451§ 4.3.3.1.</p>						

**SDG&E Response & Actions:**

SDG&E values the safety of the public and our employees and strives to learn from any incident. SDG&E disagrees with SED’s assessment that SDG&E failed to follow gas standard G7451 while excavating. On 3/29/2021, an SDG&E crew was potholing the existing ¾ inch service at █████ Merritt Blvd. in La Mesa. While removing the existing pavement with a backhoe, the crew damaged a shallow service that was 2 inches below the asphalt. The crew was required to pothole the existing ¾ inch service to locate underground facilities per GS G7451 section 4.3.3.3.1, which states: *Pothole all marked subsurface installation locations with hand tools within the tolerance zone. The tolerance zone hand excavating requirement is measured from the edge of the subsurface installation, as indicated by the owners and/or operators’ markings.* Also, section 1.1. of the gas standard G7451 states: *Company and Company Contractor personnel performing excavation and/or construction activities must follow all State of California Regulations (I.e., California Government Code, Title 1, Division 5, Chapter 3.1, Section 4216) to prevent damage to subsurface installations. California Code 4216.4(2)(B) states: An*

*excavator may use power-operated or boring equipment for the removal of any existing pavement only if there is no known surface installation contained in the pavement.*

Corrective Actions:

- The incident was shared and discussed with all applicable company employees in order to share lessons learned
- SDG&E management will continue emphasizing the importance of exercising caution while performing construction activities like removing asphalt and concrete when excavating near underground facilities.
- Management will continue to annually review GS G7451 Prevention of Damage to Subsurface Installations with affected employees to reinforce precautions are taken during construction activities to prevent damage to underground facilities.