

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 9, 2022

Non-DOT completed in Q1-2022

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 (Commission) reviewed Southern California Gas Company (SoCalGas)'s response letter dated May 5, 2022, addressing the probable violations identified by SED during its investigation of Non-DOT reportable incident that occurred on July 14, 2021.

Attached is a summary of SED's investigation findings, SoCalGas's response to SED's findings, and SED's evaluation of SoCalGas's response to the probable violations.

This letter serves as official closure and any matters that are being considered for enforcement will be processed through the Commission's Citation Program or formal proceeding.

Thank you for your cooperation in this investigation. If you have any questions, please contact Mohammad Ali, Senior Utilities Engineer (Supervisor), at (916) 928-2109 or by email at ma5@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Mahmoud Intably".

Mahmoud (Steve) Intably, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

cc: See next page

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Non-DOT Reportable Incident on July 14, 2021
Identified Probable Violations

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

“(a) 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.....”

2. G.O. 112-F, Reference Title 49 CFR, Part 192, §192.614(c)(5) states:

“(c) The damage prevention program required by paragraph (a) of this section must, at a minimum:

(5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.”

On July 14, 2021, at approximately 0805 hours, a third-party contractor, Pauley Construction, struck a SoCalGas 2-inch plastic gas main line with a mini excavator, resulting in damage to the gas main and a release of natural gas into the atmosphere. SED’s investigation found that the incident was caused by SoCalGas failing to provide temporary marking for the gas main line as required by a valid USA ticket prior to excavation. Therefore, SED found SoCalGas in violations of G.O. 112-F, Reference Title 49 CFR, Part 192, §§ 192.605(a) and 192.614(c)(5).

SoCalGas Response & Actions:

SoCalGas puts public and employee safety as its top priority and is dedicated to learning from any incident that may occur as a result of its work activities. SoCalGas acknowledges that the incident on 7/14/2021 at the intersection on Shrimp Lane, west of Washington Street in the City of Winchester, CA was the result of the SoCalGas company locator not following **Gas Standard GS 184.0200 – Underground Service Alert and Temporary Markings** for temporary markings of Company subsurface installations on the ticket A211610956.

Corrective Actions:

- SoCalGas conducted a full investigation of this incident to determine the cause of the incident, who was responsible, what actions to take next, and what lessons could be learned from it.
- Through the investigation, it was revealed that the locate and mark employee needed additional training to be aware that he or she could obtain available construction drawings that were attached to a Work-In-Progress/Notification Polygon in GIS, which depicts recent construction activities.
- As part of project execution, the Company initiates a Work-in-Progress/Notification Polygon during the planning phase. Once planning is complete, construction drawings are attached to the polygon in GIS and made available for viewing as an attached pdf. The documents remain attached to the polygon while the project is in construction and throughout the closeout phase

of the project until final posting. This practice allows for field personnel to have access to construction drawings of new projects that are spatially referenced in GIS while the capital project is being completed in the field and/or is being fully incorporated into the Company's records during the close out process.

- The employee received refresher training on the GS 184.0200 – *Underground Service Alert and Temporary Markings* and a locator's responsibilities which includes, but is not limited to, detailed reviews of each ticket to ensure all markings are being performed for the entirety of the requested delineated area of excavation.
- To address the potential for other existing field personnel who may need supplemental training, Info Bulletin 2154, *Viewing WIP Cloud and Notification Polygon Maps While Performing Locate and Mark* was issued on 11/15/21, providing step-by-step guidance on how to obtain construction drawings when there is a Work-In-Progress/Notification Polygon in GIS. Training was completed for qualified field employees on 12/01/21.
- Formalized Training reviewed the locate and mark curriculum to enhance training for new locate personnel on the procedure to obtain construction drawing attached to the WIP/notification polygon in GIS.

SED's Conclusion:

SED has reviewed SoCalGas's response and accepts the proposed corrective actions. SED acknowledges that the proposed corrective actions will promote and foster strong safety culture, and sufficiently address the probable violations. SED recommends no fines or penalty be imposed at this time.