

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 10, 2022

Non-DOT Q3-2022

Mr. Rodger Schwecke
Senior Vice President and Chief Infrastructure Officer
San Diego Gas and Electric Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

SUBJECT: Notice of Non-DOT Gas Incident Violation for San Diego Gas & Electric Company (SDG&E)

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submits the following Notice of Probable Violations (NOPV) for non-DOT reportable incident investigations completed in Q3-2022. This letter serves as notification to you that as a result of our investigations, SED found SDG&E in violations of the following:

1. General Order (G.O.) 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, §192.614(c)(5) states in part:

- (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."*

2. G.O. 112-F, Reference Title 49 Code of Federal Regulations, Part 192, §192.605(b)(3) states in part:

- (b) *Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.*
(3) *Making construction records, maps, and operating history available to appropriate operating personnel."*

The summary of the identified violations is listed in the Attachment A of this letter. Please provide a written response within 30 days of the date of this letter indicating the measures taken by SDG&E to address the violations noted in the "Attachment A" of this letter.

Thank you for your cooperation in this investigation. If you have any questions, please contact M. 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

Attachment
cc: See next page

Alex Hughes, Manager
Pipeline Safety and Compliance
Southern California Gas Company
555 West 5th Street
Los Angeles, CA 90013

Daniel Rendler, Senior Director
Safety Management Systems
Southern California Gas Company
555 West 5th Street
Los Angeles, CA 90013

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

M. Mohammad Ali, Ph.D., P.E.
Senior Utilities Engineer (Supervisor)
Gas Safety and Reliability Branch
Safety and Enforcement Division

Kan-Wai Tong, P.E.
Senior Utilities Engineer (Supervisor)
Gas Safety and Reliability Branch
Safety and Enforcement Division

Gordon Huang
Utilities Engineer
Gas Safety and Reliability Branch
Safety and Enforcement Division

Gordon Kuo, P.E.
Utilities Engineer
Gas Safety and Reliability Branch
Safety and Enforcement Division

Claudia Almengor
Associate Governmental Program Analyst
Gas Safety and Reliability Branch
Safety and Enforcement Division

Attachment A
List of Incidents with Probable Violations

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Finding	Code Violation(s)
G20210909-3264	9/9/2021	2001 Main St., Chula Vista, CA. County: San Diego	SDG&E	N/A	On September 9, 2021, at approximately 1555 hours, an SDG&E aboveground distribution regulator station malfunctioned resulting in a service interruption. SED's investigation found that the incident was caused by unauthorized persons tampering with a regulator station valve. During the investigation, SED found a discrepancy in SDG&E's regulator station design records, where in an upstream branch valve was not shown in RS 1344 regulator station diagram. Therefore, SED finds SDG&E to be in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(b)(3).	G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(b)(3)
G20220406-3363	4/6/2022	1130 Emerald Ave, El Cajon, County: San Diego	SDG&E	HHS Construction	On April 6, 2022, at around 1317 hours, a third-party contractor, HHS Construction, struck an SDG&E 1/2-inch plastic service line with a horizontal boring machine, resulting in damage to the service line, release of natural gas into the atmosphere and a service interruption. SED's investigation found that the incident was caused by SDG&E failing to make the construction maps/records available to its locator and provide the temporary markings for the service line as required by a valid USA ticket prior to the excavation. Therefore, SED finds SDG&E in violations of G.O. 112-F, Reference Title 49 CFR, Part 192, Sections 192.605(b)(3) and 192.614(c)(5).	G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(b)(3) and §192.614(c)(5)