



Alex Hughes
Pipeline Safety & Risk Mitigation Manager
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May 5, 2023

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 following Notice of Probable Violation (NOPV) for a Non-DOT reportable incident investigation completed in Q1 of 2023.

Below is San Diego Gas & Electric's (SDG&E's) written response.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", is written over a light blue rectangular background.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

cc: Larry Andrews, SoCalGas
Terence Eng, GSRB
M. Mohammad Ali, SED
Kan-Wai Tong, SED
Jordan Neumayer, SED
Claudia Almengor, SED

2023 SDGE 1st Quarter Non-DOT Incident Investigation Response

Violation:

G.O. 112-F, Reference Title 49 CFR, Part 192, §192.353(a)

On October 15th, 2022, at approximately 1014 hours, a vehicle struck an SDG&E meter set assembly (MSA) resulting in a release of natural gas into the atmosphere, service interruption, and damage to the MSA. SED's investigation found that the incident was caused by SDG&E failing to protect its MSA subject to vehicular damage prior to the incident. Therefore, SDG&E is in violation of G.O, 112-F, Reference Title 49 of Code of Federal Regulation (CFR), Part 192, § 192.353(a).

Response:

- SDG&E strives to learn from any incident, in order to ensure the safety of the public and our employees. SDG&E acknowledges the meter set assembly located within a potential vehicular parking area was not adequately protected to prevent vehicular damage.

Corrective Actions:

- The meter set assembly location was evaluated, and protection has been installed, per Work Order #530000297109.
- SDG&E investigated the incident to determine why it occurred, who was responsible, and what actions to take next.
- Leakage Mitigation supervision reviewed the gas standard D7115 – *Barricades for Gas Meters* with all patrollers and emphasized the importance of reporting locations requiring protection in accordance with the gas standard.
- The incident was shared and discussed with all applicable company employees to stress the importance of properly reporting and remediating abnormal operating conditions.