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November 3, 2023

Mr. Terence Eng, P.E.,  
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 conducted a General Order (G.O). 112-F Transmission Construction Inspection of SDG&E facilities on August 7, 2023. The activities involved inspection of production girth welding of joints of a new Line 1600 (L1600) segment, non-destructive testing of welds, and coating inspection of approved girth welds, in the general area of Marine Corps Air Station (MCAS) North, in Miramar, San Diego County.

SED staff identified one (1) probable violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations, Part 192. Below is SDG&E's written response.

Please contact Alex Hughes at (213) 671-1344 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  
Matthewson Epuna, GSRB  
Molla Mohammad Ali, GSRB  
Claudia Almengor, GSRB  
Wilson Lule, GSRB

## 2023 SDGE L1600 MCAS North CPUC Field Inspection Response

### Violation:

#### General Order (GO) 112-F Reference Title 49 CFR, Part 192, §192.605 (a)

#### 1. General Order (GO) 112-F Reference Title 49 CFR, Part 192, §192.605 (a) States in Part:

*“(a) Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency responses...Appropriate parts of the manual must be kept at the location where operations and maintenance activities are conducted.”*

During the field inspection, SED staff asked the SDG&E welding inspector for a copy of the welding procedure. The inspector told SED that the welding procedure was on the iPad. SED asked to see the procedure; however, the welding inspector blamed a network issue for not being able to access the procedure on the iPad. Furthermore, the welding inspector could not produce a printed copy of the procedure.

SDG&E’s welding inspector did not have access to the Welding Procedure (SMAW 6) at the construction site where operations and maintenance activities were conducted. Therefore, SED finds SDG&E in violation of General Order 112-F, Reference Title 49 CFR, Part 192 §192.605(a).

### Response:

SDG&E disputes the Safety & Enforcement Division’s (SED’s) finding that SDG&E’s Line 1600 welding inspector did not have access to the Welding Procedure (SMAW 6) at the construction site. Per PHMSA Operations & Maintenance Enforcement Guidance Part 192 Subparts L and M (7-21-2017 edition) for 192.605, *“The manuals can be made available to operations personnel as hard-copy or computer-based documents but must be accessible at locations where operations and maintenance activities are conducted. If the operations and procedures manual(s) are computer based, the operator must provide a means to access the procedures in the event of computer failure.”*. SDG&E had an approved written plan, and it was accessible electronically by the welding inspector during the field inspection. Since the welding inspector was having network issues with his iPad, which contained the applicable welding procedures, he called his on-site coworker to obtain the procedures, via mobile phone email. Welding work was not taking place during this period. The welding procedures were quickly obtained via mobile phone, produced for the CPUC inspector to view, and work was allowed to resume. Per PHMSA, paper or electronic versions of procedures and standards are acceptable.

**Corrective Actions:**

Even though SDG&E disputes SED's finding given that the welding inspector was able to produce the procedure, SDG&E has nevertheless taken proactive measures by providing refresher training to Line 1600 project personnel regarding accessing welding procedures (and all Gas Standards) while in the field, when there is potential for network issues. The refresher training included instructions on how to access the procedures and standards and who to contact when experiencing technical difficulties with work devices. The SDG&E inspectors understand how to access and download standards directly to their work devices when they will be working in areas where network connectivity could be an issue.

This event was shared and discussed with all applicable employees to share lessons learned.