

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 8, 2024,

Non-DOT completed in Q3-2023

Rodger Schwecke,
Senior Vice President and Chief Infrastructure Officer
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

SUBJECT: Closure letter of Non-DOT Gas Incident Violation for Southern California Gas Company (SoCalGas)

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 December 27, 2023, addressing SED's request to provide proof of implementation of corrective actions for the probable violation identified by SED during its investigation of Non-DOT reportable incident that occurred on February 17, 2023.

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

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 Molla Mohammad Ali, Senior Utilities Engineer (Supervisor), at (415) 471-9289 or by email at ma5@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mahmoud Intably".

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

cc: See next page

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

Larry Andrews, Emergency Strategy & Operations Manager
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

Jordan Neumayer,
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

Non-DOT Reportable Incident on February 17, 2023

Identified Probable Violation

1. G.O. 112-F, Reference Title 49 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.”

On February 17, 2023, at approximately 0921 hours, SoCalGas received multiple customer calls of gas pilot outages due to an under-pressure event affecting 165 customers for approximately 78 hours. SED’s investigation found that the incident was caused by SoCalGas’ failure to develop an adequate procedure/plan articulating the downstream valves positions, to maintain gas supply to the customers served by its transmission pipe, L2000 via regulating station, ID 1343E, during pressure restoration activities on L2000. Therefore, SED finds SoCalGas in violation of General Order (G.O.) 112-F, Reference Title 49 CFR, Part 192, §192.605(a) for failing to prepare an adequate written procedure/plan for the maintenance activities on its L2000 prior to the incident.

Response:

SoCalGas puts public and employee safety as its top priority and is dedicated to learning from all incidents. SoCalGas acknowledges that the incident On February 17, 2023, was the result of human factors causing the written procedure and execution to not be at the level that we expect for reliable service.

Corrective Actions:

Based upon its internal review of the incident, SoCalGas has identified the following improvements:

- Better highlight in our existing procedures the need for verification of current valve position.
- Stakeholder workgroups will more closely communicate when implementing valving procedures.
- Project planning teams, for maintenance and operation projects, will provide project stakeholders notification of completed pre and post project activities related to valve positions.
- Operations personnel will notify engineering when Notice of Shutdowns (NOS) are applicable and post job activities are completed.
- Engineering will develop guidance for monitoring pressure onsite while closing valves.

SED’s Conclusion:

SED has reviewed SoCalGas’ response and agrees with the corrective actions. SED requests copies of any documents (Standards, procedures, etc.) that are updated as a result of this violation. SED recommends no fines or penalties be imposed at this moment.

SoCalGas’ Follow Up Response:

SoCalGas has updated Gas Standard 184.06, section 4.5.4, to clearly state the valves used in the gas handling procedure must have their current position verified and documented as well as on the Distribution Engineering valve procedures template. See Attachment_1_Gas Standard 184.06, Gas-

Handling and Pressure control, and Attachment_2_Distribution Engineering Valve Procedures. The updates implemented to Gas Standard 184.06 and the Distribution Engineering Valve Procedures template will ensure Stakeholder workgroups, planning teams, and operations personnel continue to follow best practices to closely communicate and notify stakeholders about pre and post project activities. Updates to Form 3506, Notice of Shutdown/ Operational Deviation was updated on 5/1/2023, which clarified instructions on submitting notifications. Finally, Gas Engineering has completed guidance for monitoring pressure onsite, and instructions have been included in the updated GS 184.06, section 4.5.8.3. All attachments are available in the PS&C/CPUC SharePoint for review.

SED's Conclusion:

SED has reviewed the updated documents and procedures provided by SoCalGas and accepts the corrective actions. SED acknowledges that the corrective actions will promote and foster strong safety culture, and sufficiently address the probable violations. SED recommends no fine or penalty be imposed at this time. However, SED may review the implementation of the stated corrective actions during future inspections.