

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 5, 2023

GI-2023-03-SCE-70-03-04-05-06-07-09

Ms. Jill Anderson
(Jill.C.Anderson@sce.com)
Executive Vice President of Operations
Southern California Edison Company
2244 Walnut Grove Ave
Rosemead, CA 91770

SUBJECT: General Order 112-F Operation and Maintenance Comprehensive Gas Inspection of Southern California Edison's Petroleum Gas Pipeline in Catalina Island

Dear Ms. Anderson:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) reviewed Southern California Edison Company (SCE) response letter and attachments, dated June 23, 2023, addressing two (2) of four (4) remaining **General Order (G.O.) 112-F Comprehensive Operation and Maintenance Inspection of Southern California Edison Catalina Petroleum Gas Pipeline (SCE Catalina LPG)'s City of Avalon Distribution System** (Inspection Unit) Concerns. The Inspection Unit was conducted on March 20 through March 24, and March 28 of 2023 for SCE Catalina LPG operations calendar years 2019 through 2022. SED reviewed and accepted prior SCE post-inspection responses to two (2) other Inspection Unit Concerns, as stated in SED's May 26, 2023, "SED Inspection Report".

Attached is a summary of all SED's inspection findings, SCE's responses to SED's findings, and SED's evaluation of SCE's responses to the findings.

This letter serves as an official closure of SED's 2023 G.O.112-F Comprehensive Operation and Maintenance Inspection of SCE's Inspection Unit. Any matters that are being considered for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this inspection. If you have any questions, please contact Randy Holter, Senior Utilities Engineer-Specialist, at (213) 576-7153 or by email at randy.holter@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

Attachments: see Post-Inspection Written Preliminary Findings
cc: see next page.

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Attachment

Post-Inspection Written Preliminary Findings

Date of Transmittal: 05/18/2023

Dates of Inspection: Mar 20-24, 2023

Operator: SOUTHERN CALIFORNIA EDISON CO

Operator ID: 18480 (primary)

Inspection Systems: SCE LPG Distribution System at Avalon, Catalina Island

Assets (Unit IDs) with results in this report: Catalina Island (87037)

System Type: GD

Inspection Name: SCE Catalina LPG System - Avalon

Lead Inspector: Randy Holter

Operator Representative: Traci Degnan – SCE Catalina LPG Compliance Advisor

Unsatisfactory Results:

No Preliminary Findings.

Concerns:

Procedures: Damage Prevention Program (PRO.SUBLDAMAGEPREVENT)

1. Question Title, Documented Damage Prevention Program – TPD, PD.DP.TPD.P ID

Question 4. Does the process specify how reports of Third-Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?

References 192.614(c)(1)

Assets Covered Catalina Island (87037 (70))

Issue Summary SED reviewed SCE Catalina LPG’s Standard Procedure (SP)-430, Section 9.0 that states in part:

“SCE will maintain a list of excavators performing routine excavation activities within the SCE Catalina operating territory. SCE will update the list by obtaining the ticket requests from Dig Alert from the previous

2 years. SCE will review use this information to identify new active excavators and remove those who are no longer performing excavation activities on Catalina Island. This list of excavators will be included in our annual Dig Alert Contractor Safety Awareness Seminar.”

Title 49 CFR, Part 192, §192.614(c)(1) and §192.614(c)(1) states:

- “(1) Include the identity, on a current basis, of persons who normally engage in excavation activities in the area in which the pipeline is located.*
- (2) Provides for notification of the public in the vicinity of the pipeline and actual notification of the persons identified in paragraph (c)(1) of this section of the following as often as needed to make them aware of the damage prevention program:*
 - (i) The program's existence and purpose; and*
 - (ii) How to learn the location of underground pipelines before excavation activities are begun.”*

California Government Code (CGC), §4216.2(f) states in part:

“A record of all notifications by an excavator or operator to the regional notification center shall be maintained for a period of not less than three years.”

SED recommends SCE Catalina LPG maintain a *record of all notifications by an excavator or operator to the regional notification for a period of not less than three years (instead of two).”*

SCE’s Response and Remedial Action:

On May 3, 2023, 2023, with an email, SCE Catalina LPG provided SED with the following response:

“SCE Catalina LPG has updated SP-430, Section 9.0 – Annual Update of Dig Alert Information, to obtain the ticket request for Dig Alert from the previous 3 years instead of 2 years to ensure SCE includes all potential excavators in the area, even if they are not frequent excavators in the distribution area.

SED’s Conclusion:

SED has reviewed SCE Catalina LPG’s response and accepts the corrective action that it has articulated and implemented. However, SED may verify the corrective action during future inspections.

Procedures: Emergency (PRO.SUBLEMERGOPS)

2. Question Title, Incident Investigation Actions, EP.ERG.INCIDENTACTIONS.P
ID

Question 11. Does the process include procedures for beginning action under 192.617, if applicable, as soon after the end of the emergency as possible?

References 192.615(a) (192.615(a)(10))

Assets Covered Catalina Island (87037 (70))

Issue Summary SED reviewed SCE Catalina LPG's Emergency Response Plan, Section 2.19 Training and Post-Incident Review section states in part:

"SCE Catalina LPG gas utility staff should conduct an After-Action Review (AAR) of significant incidents and responses with an emphasis on response methods, strategies, management, and related information with the intent on strengthening team capability and performance. This process is outlined in Standard Procedure 415 Accident and Failure Investigation of SCE's Catalina Gas Operations and Maintenance Manual."

SED also reviewed the SCE Catalina LPG's SP-415 Accident and Failure Investigation.

Title 49 CFR, Part 192, §192.617 Investigation of failures.

"Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence."

Title 49 CFR, Part 192, §192.615 (a) states in part:

"Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

(10) Beginning action under § 192.617, if applicable, as soon after the end of the emergency as possible."

SCE Catalina LPG's Attachment 415-A Failure Investigation/Follow-up after Emergency form, page 1 of 9 does not specify its terms for "...as soon after the end of the emergency as possible."

To clarify SCE Catalina LPG's Attachment 415-A, definition, and expectations for "Beginning action under § 192.617...", SED recommends that SCE Catalina LPG's provide procedures for establishing "End of Emergency, and/or Site Made Safe" definitions, and add expected "Beginning Action" timeline to Form 415-A.

SCE's Response and Remedial Action:

SCE updated Standard Procedure 415 – Accident and Failure Investigation, Section 1.0 Key Definitions to include definitions for “Site Made Safe/End of Emergency” and “Specimen”.

Section 3.0 – After-Action Review (AAR) has been updated to include verbiage that states an AAR will be conducted as soon after the emergency as possible for analyzing accidents and failures. Section 3.1 has been added to include Investigation of Failure and Incident Procedure, including Response to Failure, Data Collection, Investigation, Specimen Collection and Testing and Analysis.

Attachment 415-A has been reformatted to the changes made to Section 3.1 and to include a “Beginning Action Timeline”.

Attachment SP-415 – Accident and Failure Investigation

SED's Conclusion:

SED has reviewed SCE Catalina LPG's response and accepts the corrective action that it has articulated and implemented. However, SED may verify the corrective actions during future inspections.

Procedures: Odorization of Gas (PRO.SUBLODOR)

3. Question Title, Odorization of Gas, MO.GOODOR.ODORIZE.P ID

Question 1. Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with 192.625?

References 192.605(b)(1) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))

Assets Covered Catalina Island (87037 (70))

Issue Summary SED reviewed SCE Catalina LPG's SP- 409, which outlines the activities performed to ensure that the propane in the petroleum gas pipeline distribution system contains the proper concentration of odorant.

Title 49 CFR, Part 192, § 192.625 states in part:

“(c) In the concentrations in which it is used, the odorant in combustible gases must comply with the following:

(1) The odorant may not be deleterious to persons, materials, or pipe.

(2) The products of combustion from the odorant may not be toxic when breathed nor may they be corrosive or harmful to those materials to which the products of combustion will be exposed.”

SED noted that SCE Catalina LPG currently does not have any process in its

procedures to ensure the odorant in its system is not deleterious to persons, materials, or pipe. SCE Catalina LPG's team explained that it already receives odorized propane from its propane supplier(s). SED recommends SCE Catalina LPG establish a process to ensure *the odorant is not deleterious to persons, materials, or pipe.*

SCE's Response and Remedial Action:

On May 3 and May 4, 2023, SCE Catalina LPG provided the following responses via email:

1. *Revised its procedure SP-409 to require receiving written verification from their gas source that the gas has the proper odorant and*
2. *Conducting periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable.*

SED's Conclusion:

SED has reviewed SCE Catalina LPG's response and accepts the corrective action that it has articulated and implemented. However, SED may verify the corrective action during future inspections.

Records: Operations and Maintenance (PRR.OM)

4. Question Title, Odorization of Gas, MO.GOODOR.ODORIZE.R
ID

Question 16. Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?

References 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))

Assets Covered Catalina Island (87037 (70))

Issue Summary SCE Catalina LPG's SP- 409 - Monitoring and Verification of Petroleum Gas Odorization (Revised April 2023), Section 4.0 Propane Odorization Program states in part:

“According to federal regulations, the odor must be readily detectable when the propane concentration in air is at 0.42% (one-fifth LEL) or less. The LEL of propane in air is 2.1%...”

SED reviewed SCE Catalina LPG's odorant test records for 2019 through 2022. In its 5/12/2022 test record for Bird Park Road test station, SCE Catalina LPG's crew reported odorant level in the gas to be 19%. In a similar test record on 9/15/22, SCE reported an odorant level of 20%. SCE Catalina LPG's management stated that these numbers were meant to be 0.19% and 0.20% respectively; the crews made data input errors.

SED recommends SCE Catalina LPG ensure its crews understand the requirement of odorant level in the gas so that at a concentration in air of one-fifth of the lower explosive limit, the gas is readily detectable by a person with a normal sense of smell as required by 49 CFR §192.625 (a) and ensure accurate recording on the inspection forms.

In addition, SP 409, Section 4.0 states, in part:

“Using a portable odor concentration analyzer, the coordinator will conduct quarterly sampling to confirm that the propane is readily detectable by smell at this concentration.”

In SED’s review of 2020 test record for SCE Catalina LPG’s Bird Park Road test station, SED noted that SCE Catalina LPG crew conducted an odorant test on 4/17/2020 and subsequent inspection on 9/22/2020, more than 5 months later. Similarly, in 2021, SCE crew conducted a test on 4/5/2021 and conducted a subsequent test on 9/2/2021. SED recommends SCE Catalina LPG revise its procedures to include a time interval tolerance (e.g., *intervals not exceeding 4 ½ months, but at least four times each calendar year*) to ensure that it is conducting the quarterly odorant tests at more consistent intervals.

SCE’s Response and Remedial Action:

SCE conducted a training session with gas personnel on 5/3/23 to discuss the Odorator Inspection Form and to ensure operators understood the requirement of odorant level in the gas so that at a concentration in air of one-fifth of the lower explosive limit, the gas is readily detectable by a person with a normal sense of smell. Also discussed the proper data logging of the readings with understanding as to the decimal point and the importance of what it means and what actions to take when there is an abnormal reading.

Although there is no specific timeframe requirement for performing the odorant tests, i.e., Title 49 192.625 (f) (2) - *Conducting periodic “sniff” tests at the extremities of the system to confirm that the gas contains odorant*, SCE will continue to perform odorant tests on a frequent interval, not to exceed 4 ½ months, but at least 4 times a year.

To ensure the odorant testing does not exceed the 4 ½ month timeframe, SCE will set up a notification system via SAP and EHSync to remind crews when this item is due and will require a formal close out of the item with the date it was performed.

4.0 Propane Odorization Program

According to federal regulations, the odor must be readily detectable when the propane concentration in air is at 0.42% (one-fifth LEL) or

less. The LEL of propane in air is 2.1%. Using a portable odor concentration analyzer, the coordinator will conduct sampling in intervals not exceeding 4 ½ months, but at least four times each calendar year to confirm that the propane is readily detectable by smell at this concentration. The results of the field sampling shall be recorded on the Field Odor Verification Form as presented in Attachment 409-B.

Attachment: Training Roster 5/3/23

Attachment: SP-409

SED's Conclusion:

SED has reviewed SCE Catalina LPG's response and accepts the corrective action that it has articulated and implemented. However, SED may verify the corrective actions during future inspections.