



Alex Hughes
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December 28, 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 Inspection of Southern California Gas Company's (SoCalGas)' Anti-Drug and Alcohol Prevention Program (Inspection Unit) on October 9 through October 11, 2023. SED staff reviewed SoCalGas' written procedures and conducted a field observation pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (CFR), Parts 199 and 40. The inspection also included a review of SoCalGas' records from the calendar years 2019 to 2022.

SED staff noted one (1) area of concern. Below is SoCalGas' 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", with a long horizontal flourish extending to the right.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

CC:

Larry Andrews, SoCalGas
Mahmoud Intably, SED/GSRB
Kan-Wai Tong, SED/GSRB
Randy Holter, SED/GSRB
Claudia Almengor, SED/GSRB

2023 SoCalGas Anti-Drug and Alcohol Prevention Program Audit Response

Concern:

Drug and Alcohol : Alcohol Misuse Prevention Program (DA.ALCOHOL)

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| Question Title, ID | BAT/STT Alcohol Screening Test Reports, DA.ALCOHOL.SCREENINGTEST.P |
| Question | 11. Does the process ensure that alcohol screening test results are reported as required to the DER? |
| References | 40.247(a) |
| Assets Covered | SoCalGas - DA - T - Procedures (Procedures (40A)) |
| Issue Summary | <p>SED reviewed SoCalGas' <i>Drug and Alcohol Misuse Prevention Program Plan</i> (Plan), SECTION XII. ALCOHOL TESTING AND EQUIPMENT, Test procedure, which states in part: <i>"If the screening test result is an alcohol concentration of less than 0.02, no further testing is authorized, and there is no DOT action to be taken."</i></p> <p>and Plan SECTION XIII. BREATH ALCOHOL TECHNICIAN (BAT) GUIDANCE, BREATH ALCOHOL TESTING PROCEDURES, D. Screening Test procedure, which states:</p> <ol style="list-style-type: none"> 1. <i>Step one requires the BAT to complete employee information (employee name, employee ID number, driver's license or social security number, employer address and telephone number) and the test type.</i> 2. <i>Step two requires the employee to sign the form or logbook certifying the information provided is true and correct. Failure to sign or initial shall not be considered a refusal to be tested and the BAT shall note the employee's failure to sign or initial in the remarks section.</i> 3. <i>After the BAT attaches an individually sealed mouthpiece (opened in view of the employee) to the EBT, the BAT shall instruct the employee to blow forcefully into the mouthpiece until the EBT indicates adequate breath has been obtained.</i> 4. <i>The EBT may print the results on the Alcohol Testing Form and the BAT shall show the employee the results displayed on the EBT. If results are not printed on the Form, the BAT will affix to the Form the test printout using a method that will provide clear evidence of removal.</i> 5. <i>If the result of the screening test is an alcohol concentration of .02 or greater, a confirmation test shall be performed."</i> <p>Title 49 CFR Part 40 §40.247(a) states:</p> <p><i>"If the test result is an alcohol concentration of less than 0.02, as the BAT or STT, you must do the following:</i></p> |

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| | <p><i>(1) Sign and date Step 3 of the ATF; and</i> <i>(2) Transmit the result to the DER in a confidential manner, as provided in § 40.255.”</i></p> <p>The Plan failed to reference Title 49 CFR, Part 40, §40.247(a) and that the BAT or STT must sign and date Step 3 of the ATF, then transmit the result to the DER in a confidential manner if the alcohol screening test result is an alcohol concentration of less than 0.02. SED recommends that SoCalGas to reference in its Plan, Title 49 CFR, Part 40, §40.247(a), that alcohol screening test results must be signed, dated, and transmitted to the DER in a confidential manner, as provided in § 40.255.</p> |
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Response & Actions:

SoCalGas will make the recommended change to the Plan and will provide an updated copy to SED by Friday, January 12, 2024.