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August 16, 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 (CPUC) conducted a **General Order (G.O.) 112-F comprehensive and full review inspection of Southern California Gas Company (SoCalGas)'s Basin Transmission Area** on April 17 through 21 and April 24 through April 28, 2023. SED staff conducted field inspections of a representative sample of SoCalGas facilities in the Basin Transmission Area. SED staff also reviewed the Basin Transmission Area's operator qualification records, which included field observation of randomly selected individuals performing covered tasks. SED staff used the Pipeline and Hazardous Materials Safety Administration's (PHMSA) Inspection Assistance (IA) as a reference guide to conduct this inspection.

SED's staff identified **one** probable violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192. Attached are SoCalGas written responses.

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", written over a light blue rectangular background.

Alex Hughes  
Pipeline Safety and Risk Mitigation Manager

CC:

Kan-Wai Tong, GSRB  
Molla Mohammad Ali, GSRB  
Claudia Almengor, GSRB  
Matthewson Epuna, GSRB

## 2023 SoCalGas Basin Transmission Audit Response

**Notice of Probable Violation:**

**Time-Dependent Threats: Atmospheric Corrosion (TD.ATM)**

Question Title, ID	Atmospheric Corrosion Monitoring, TD.ATM.ATMCORRODEINSP. O
Question	5. Is pipe that is exposed to atmospheric corrosion protected?
References	192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), 192.481(d))
Assets Covered	T: Basin (87054 (51))
Issue Summary	<p>Title 49, CFR Part 192, Section 192.481(c) states that; <i>"If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by § 192. 479."</i></p> <p>During field inspections on 4/20/2023, SED observed the following deficiencies:</p> <ol style="list-style-type: none"> <li>1. Appearance of pipe coating degradation, with evidence of chipped paint and atmospheric corrosion throughout the entire length of the Bridge Span (<b>Span L1026 MP 26.80</b>).</li> </ol> <p>SoCalGas' follow up work order <b>5439469</b> was issued on October 26, 2019, for remediation of substandard conditions that were noted on the Bridge and span <b>L1026 MP 26.80</b>.</p> <ol style="list-style-type: none"> <li>2. Appearance of pipe coating degradation, with evidence of chipped paint and atmospheric corrosion at the base of the Bridge and Span <b>L7677 MP 3.82</b>.</li> </ol> <p>SoCalGas had not completed remediation by the time of the SED's inspection, or by the next inspection due date after initial discovery. Therefore, SED finds SoCalGas in violation of Title 49, CFR Part 192, Section 192.481(c), for failure to provide protection against corrosion as required by §192.479.</p>

**Response:**

1. SoCalGas agrees that span L1026 MP 26.80 did not have the coating remediated at the time of SED's inspection in 2023. However, SoCalGas had previously identified the AOCs (abnormal operating conditions) for span L1026 MP26.80 on a routine Bridge & Span work order. When the AOCs were identified, SoCalGas created a follow up work order to correct the AOCs. The exemption for the Coastal Commission permit was granted and environmental clearance has been received. SoCalGas is currently waiting for scaffolding design approval before construction can begin. Construction is expected to begin in January 2024 with the pipeline isolation scheduled for February 2024.

SoCalGas does not have the proper, safe, approved scaffolding to access the pipeline. Once an approved scaffold design is available, SoCalGas will begin remediation on the span. Additionally, the pipeline upstream and downstream of the span is within tolerance on their bi-monthly and annual CP reads, providing cathodic protection against corrosion per 49 CFR 192.463.

2. The span location listed in the closure letter "Line 7677 MP 3.82" does not exist. SoCalGas assumes the location described in the closure letter is L767 MP2.26 which was the span that was visited on Line 767 that day. SoCalGas disagrees with this determination. The AOCs (abnormal operating conditions) that were found during the SED audit which occurred on April 24, 2023, were first observed on that day. The AOCs observed during the audit were graffiti and one small coating spot on the pipeline with missing coating. The last documented day that this location was inspected was in November 2022 during a Pipeline Patrol order. The Bridge & Span inspection for L767 MP2.26 was completed on March 30, 2022. On neither the Pipeline Patrol order nor the Bridge & Span order were there any AOCs present. A follow up work order was created when the AOCs were observed on April 24, 2023, and repairs were completed on June 9, 2023