



Alex Hughes
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November 10, 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 Inspection of Southern California Gas Company's (SoCalGas) Damage Prevention Program (DPP) and Public Awareness Program (PAP) on August 7 through 14, 2023. SED staff reviewed SoCalGas' written programs, procedures, and associated records regarding its DPP for the period 2019 through 2022 and its PAP records for the period 2018 through 2022. In addition, SED staff conducted field observations of SoCalGas' pipeline locate and mark activities.

SED staff noted two (2) areas of concern. Below 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", with a long horizontal flourish extending to the right.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

CC:

Larry Andrews, SoCalGas
Sann Naing, SED/GSRB
Matthewson Epuna, SED/GSRB
Claudia Almengor, SED/GSRB

2023 SoCalGas Damage Prevention Program and Public Awareness Program Audit Response

Concern:

Public Awareness and Damage Prevention : Damage Prevention (PD.DP)

1) Question Title, ID	Documented Damage Prevention Program - TPD, PD.DP.TPD.P
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	SoCalGas (88388 (40A))
Issue Summary	<p>SoCalGas uses the number of damages per 1,000 USA tickets as one of its key observations in its internal annual Public Awareness Program audits. This parameter is used as one of the criteria by the Damage Prevention (DP) industry to measure the effectiveness of the DP program. The industry uses the data reported by the operators in their PHMSA annual reports. While it is good practice to look at this data, it is also important that the data used for this evaluation be consistent and accurate. SED noted that SoCalGas’ 2022 Public Awareness Program annual report showed the total damages in 2022 to be 2545 while SoCalGas’ annual PHMSA report (Form F7100-1) shows the total number of damages to be 2791. In addition, SoCalGas’ annual report Form F7100-1 showed that, in 2022, SoCalGas received total of 1,104,907 tickets, but SoCalGas’ ticket list for 2022, which was provided to SED during the inspection, showed total of 1,105,808.</p> <p>Furthermore, during review of SoCalGas’ annually reported data, SED noted that the damaged percentage related to “Locating Practices Not Sufficient” (percentage of total excavation damages) for 2022 has increased to 10% from 9% in 2021.</p> <p>SED recommends that SoCalGas review and evaluate its records and data to identify the inaccuracies in its data. Also, SED recommends that SoCalGas drive the improvements in the identified areas.</p> <p>On September 11, 2023, SoCalGas provided the following response:</p> <p style="padding-left: 40px;"><i>“SoCalGas will evaluate data sources to verify consistency, accuracy and opportunities for further improvement.”</i></p> <p>SED would like to request a status update on SoCalGas’ identification data deficiencies noted in SED’s inspection findings.</p>

Response:

SoCalGas is currently evaluating the data sources and will correct the discrepancies to improve the consistency and accuracy in the 2024 report.

Concern:

Public Awareness and Damage Prevention : Damage Prevention (PD.DP)

2) Question Title, ID	Damage Prevention Program, PD.DP.PDPROGRAM.R
Question	7. Does the damage prevention program meet minimum requirements specified in 192.614(c)?
References	192.614(c)
Assets Covered	SoCalGas (88388 (40A))
Issue Summary	<p>SoCalGas gas standard procedure, 184.0200 Underground Service Alert and Temporary Marking, Section 4.6.20 states:</p> <p><i>"If previous company marks are visible within the delineated excavation location, the locator must attempt to verify those marks are accurate. Marks found to be inaccurate must be concealed. For example: Inaccurate marks on asphalt may be concealed with black paint. Notify supervisor if previous location marks for the same USA ticket appear to be marked at incorrect location."</i></p> <p>During the 2019 inspection of SoCalGas' Damage Prevention program, SED expressed its continued concern with SoCalGas' Damage Prevention program procedure, as currently written. The procedure did not have a process to capture and document inaccuracies. Without such a process, it will be difficult to determine the root cause of actual issues and how to remediate them. SED recommends that SoCalGas establish a process to follow and document the outcome that may pinpoint the root causes of inaccurate pipeline markings.</p> <p>On September 11, 2023, SoCalGas provided the following response:</p> <p><i>"SoCalGas will develop a written process within its gas standard. SoCalGas will provide a copy of the gas standard once it is updated."</i></p> <p>SED would like to request a status update on SoCalGas' effort to develop a written process within its gas standard.</p>

Response:

SoCalGas is currently reviewing the Gas Standard 184.0200, *Underground Service Alert and Temporary Marking* section 4.6.20 pertaining to incorrect markings found. Updates to Gas Standard 184.0200 will be completed by Q1 2024.