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August 4, 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 Operation and Maintenance Inspection of Southern California Gas Company (SoCalGas)'s NW Harbor Corridor Distribution Area (Inspection Unit)** on May 8 through 12, 2023 and May 15, 2023. SED staff reviewed maintenance activities records for the period of January 1, 2018 through December 31, 2022, and field inspections of a representative sample of the SoCalGas' facilities in Huntington Park, Compton, San Pedro and 182nd districts.

SED staff identified one (1) probable violation of G.O. 112-F, Reference Title 49 CFR, Parts 191& 192, and four (4) 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
Mahmoud Intably, GSRB
Kan-Wai Tong, GSRB
Gordon Kuo, GSRB
Claudia Almengor, GSRB

2023 SoCalGas Harbor Corridor Distribution Audit Response

Violation:

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

Title 49, CFR Part 192, §192.481(a) states in part:

“Each operator must inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:

<i>Pipeline type:</i>	<i>Then the frequency of inspection is:</i>
<i>(1) Onshore other than a Service Line</i>	<i>At least once every 3 calendar years, but with intervals not exceeding 39 months.</i>

During records review of SoCalGas’ inspections of aboveground pipe for atmospheric corrosion, SED found that SoCalGas did not inspect and evaluate aboveground pipe asset #B-17 within the required 39-month window. SoCalGas personnel stated that they were unable to gain access to inspect the aboveground pipe due to a permitting requirement.

SoCalGas stated that the permit was approved only recently to gain access to inspect and evaluate the asset #B-17. According to SoCalGas’ records, the last inspection of the asset #B-17 was completed prior to 2020. SED urges SoCalGas to be proactive in obtaining the necessary permits to meet inspection interval requirements. SED found SoCalGas in violation of §192.481(a) for its failure to inspect aboveground pipe asset #B-17 for atmospheric corrosion within the required interval.

SoCalGas Response & Actions:

Asset B17 was inspected on July 10th, 2023 (order# 52/3395021). No abnormal operating conditions were found during the inspection. SoCalGas worked with the city and has established a permitting process to ensure access to the asset as needed for inspection. Additionally, flood control has provided SoCalGas with keys for future access to the asset.

Concern:

Time-Dependent Threats: External Corrosion - CP Monitoring (TD.CPMONITOR)

Title 49, CFR Part 192, Section 192.463(a) states that:

"Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in appendix D of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria."

During the field inspection on May 12, 2023, SED observed the following Cathodic Protection (CP) packages with -0.850 volt criterion had the following pipe to soil reads:

- CP package CO413-9:
 - Read point "F" measured -0.835 volt.
 - Read point "C" measured -0.756 volt.
 - Read point "D" measured -0.775 volt.
- CP package CO162W-7, read point "I" measured -0.764 volt.
- CP package LA3223-3, read point "M" measured -0.826 volt.

SED recommends SoCalGas follow its Gas Standard 186.0135 "Operation and maintenance of Cathodic Protection Facilities" and take the necessary corrective measures to restore cathodic protection to the above CP packages to ensure compliance with Title 49, CFR Part 192, §192.463(a).

On June 14, 2023, SoCalGas provided SED troubleshooting Service Orders #520003394011, #520003392865, and #520003394587 for the downed CP areas. SED requests SoCalGas provide an update on the troubleshooting Service Orders.

SoCalGas Response & Actions:

Cathodic Protection Area C0162W-7 was brought into tolerance on 7/14/2023 after the installation of four magnesium anode orders, 540000532702, 540000532704, 540000532705, and 540000532707.

The other two areas remain out of tolerance, and SoCalGas is actively working on troubleshooting and remediation. C0413W-9 is currently polarizing after checking the area for electrical shorts and adjusting the rectifier output. Supplemental anodes are being planned for LA 3223-3.

Concern:

Generic Questions: Generic Questions (GENERIC.GENERIC)

Title 49, CFR Part 192, § Code 192.161(c) states:

"Each support or anchor on an exposed pipeline must be made of durable, noncombustible material..."

During the field inspection in San Pedro district on May 10, 2023, SED observed an exposed pipeline supported by wooden planks. SoCalGas stated that the wooden planks were treated wood and thus non-flammable, but has not provided supporting documents. SED requests SoCalGas to provide supporting documents showing that the wooden planks are made of durable, noncombustible material or remediate and replace the wooden planks with supports made of durable and noncombustible material.

On June 14, 2023, SoCalGas responded that a remediation plan for this unstable earth is currently in progress. SoCalGas also provided the preliminary designs of the replacement concrete supports. SED requests SoCalGas provide an update on the remediation process.

SoCalGas Response & Actions:

SoCalGas continues to plan the remediation for this unstable earth with the replacement of all wooden supports with concrete supports. The final design of the concrete supports was completed on July 3rd, 2023.