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November 22, 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 Comprehensive Operation and Maintenance Inspection of Southern California Gas Company (SoCalGas)'s NW Mid City Los Angeles Distribution Area (Inspection Unit)** on August 21 through 25, 2023, and August 28, 2023. SED used the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety's "Inspection Assistant Form" as a reference guide to conduct the inspection. The inspection included a review of SoCalGas' records from calendar years 2019 to 2022 and field inspections of pipeline facilities in the Belvedere, Hollywood, and Juanita Distribution Districts.

SED staff noted eight (8) 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", written over a light blue grid background.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

CC:

Larry Andrews, SoCalGas
Mahmoud Intably, SED/GSRB
Kan-Wai Tong, SED/GSRB
Gordon Huang, SED/GSRB
Claudia Almengor, SED/GSRB

2023 SoCalGas Mid-City LA Distribution Audit Response

Concern(s):

Maintenance and Operations: Gas Pipeline Odorization (MO.GOODOR)

1. Question Title, ID	Odorization of Gas, MO.GOODOR.ODORIZE.P
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	Northwest - Mid City LA (87040 (57))
Issue Summary	<p>Title 49 CFR, §192.605(b)(1) states, in part:</p> <p style="text-align: center;"><i>"The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.</i></p> <p style="text-align: center;"><i>(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part."</i></p> <p>In relation to odor testing activities observed in the inspection, SED reviewed SoCalGas' Gas Standard (GS) 189.005 "Operation of Odorometer". §3.2.7 mentions checking for gas leaks after connecting the odorometer to the sample line and prior to the test.</p> <p>However, the GS does not mention checking for leaks after the test has been concluded and following restoration of the sample connection site. SED notes that SoCalGas has conducted soap testing following odor testing as a best practice in several occasions.</p> <p>Therefore, SED recommends SoCalGas to revise GS 189.005 to include checking for leaks (e.g., soap testing) after odor testing to ensure safe operation of the pipeline system.</p>

Response:

SoCalGas supports the performance of safety checks after disturbing fittings. SoCalGas will update 189.005 to reflect the best practice of soap testing following the odor testing.

Maintenance and Operations: Gas Pipeline Odorization (MO.GOODOR)

2. Question Title, ID	Odorization of Gas, MO.GOODOR.ODORIZE.O
Question	3. Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable?
References	192.625(a) (192.625(c), 192.625(d), 192.625(e), 192.625(f))
Assets Covered	Northwest - Mid City LA (87040 (57))
Issue Summary	<p>During a field inspection on August 25, 2023, in the Hollywood District near the Cedars-Sinai Medical Center, SED observed SoCalGas personnel performing an odor test inspection to determine whether the odor level of gas in the system is readily detectable at one-fifth of the lower explosive limit. The process consisted of two steps in SoCalGas Gas Standard (GS) 189.005 "Operation of Odorometer", Section 3.3.1 "First Readily Detectable Odor Level" and Section 3.3.2 "Odor Intensity at 0.9% Gas in Air". After SoCalGas personnel completed the first step of the process, SED asked the testing personnel questions regarding the second step (validation of odor at 0.9% gas in air). This involved adjusting the rotameter's position per the % Gas in Odorometer Effluent chart. However, the testing personnel was unable to clearly describe the process. When SED then asked at which rotameter position the metal float should be set for the validation test, the testing personnel referred to the first readily detectable odor level test parameters.</p>

	<p>While other factors such as confidence and site accessibility may have impacted the testing personnel performance, SED recommended during the exit meeting on August 28, 2023, that SoCalGas provide additional coaching or refreshers to improve the quality of the odorant test inspection.</p> <p>On September 20, 2023, SoCalGas stated that a review of GS 189.005 was conducted with Hollywood district employees in relation to this concern. SED requests that a record of this session be provided for review. In addition, SED requests that SoCalGas employee ID [REDACTED]'s operator qualification record from 2019 to the present be provided to confirm requalification following the inspection.</p>
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Response:

Gas Standard 189.005 was reviewed with the three employees from Hollywood Base who perform odor intensity tests, and that review was documented on a 5300. A copy of the 5300 has been saved on the PS&C/CPUC SharePoint site. The requested Operator Qualification documentation has also been saved on the PS&C/CPUC SharePoint site.

Reporting: Regulatory Reporting (Traditional) (RPT.RR)

3. Question Title, ID	Immediate Reporting: Incidents, RPT.RR.IMMEDREPORT.R
Question	3. Do records indicate immediate notifications of incidents were made in accordance with 191.5?
References	191.5(a) (191.7(a), 191.7(d))
Assets Covered	Northwest - Mid City LA (87040 (57))
Issue Summary	<p>SED reviewed SoCalGas' initial PHMSA F 7100.1 report No. 20200021-33327 filed on 2/12/2020 in response to an incident identified on 1/13/2020 at 0943 hours (Part A, Items 4, 17). The report indicates that SoCalGas notified the National Response Center (NRC) on 1/14/2020 at 0904 hours (Part A, Item 7). In addition, SoCalGas notified SED of this incident on 1/14/2020 at 0921 hours.</p> <p>Title 49 Code of Federal Regulation (CFR), Part 191, §191.5(a) states "At the earliest practicable moment following discovery, but no later than one hour after confirmed discovery, each operator must give notice in accordance with paragraph (b) of this section of each incident as defined in § 191.3."</p> <p>Code of Federal Regulation (CFR), Part 191, §191.3 defines "Confirmed Discovery" as "when it can be reasonably determined, based on information available to the operator at the time a reportable event has occurred, even if only based on a preliminary evaluation."</p> <p>On October 23, 2023, SoCalGas stated that it determined the incident could potentially meet the reporting criteria at the time of the NRC notification on 1/14/2020 at 0904 hours. SoCalGas stated that as a best practice, it reports incidents to the DOT before estimated costs are finalized.</p> <p>SED recommends SoCalGas to ensure cost estimates are determined in a timely manner for future incidents which may meet DOT reporting criteria.</p>

Response:

As stated on October 23, 2023, it is SoCalGas' practice to report incidents to the DOT that could meet the reporting criteria of estimated property damages well before the estimated costs are finalized. This is to ensure SoCalGas does not miss the DOT reporting window of one hour. Therefore, incidents are being reported upon confirmed discovery as defined in 191.3. In the case of the incident on 1/13/2020, the initial preliminary evaluation determined the incident to not be potentially reportable. It wasn't until 1/14/2020 at approximately 0904 hours that SoCalGas was able to reasonably determine reportable criteria may possibly be met. SoCalGas reported the incident to the DOT based on information at that time, within the reporting window, per 191.5(a).

To further ensure reporting requirements are met in a timely manner, as of June 2022, SoCalGas deployed the Emergency Management Watch Desk, who are responsible for analyzing and investigating all potentially reportable events 24/7/365.

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

4. Question Title, ID	Cathodic Protection Monitoring Criteria, TD.CPMONITOR.MONITORCRITERIA.R
Question	2. Do records document that the CP monitoring criteria used was acceptable?
References	192.491(c) (192.463(a))
Assets Covered	Northwest - Mid City LA (87040 (57))
Issue Summary	<p>SoCalGas' Gas Standard (GS) 186.0005, Cathodic Protection - Mixed Piping System, Section 5.3.2.1 states:</p> <p><i>"Any facility found during routine CP10 monitoring shall require remediation if the pipe to soil measurement is below -0.900 volts DC, in order to prevent possible loss of protection for the facility during the 10-year monitoring interval. The required remediation action shall be completed."</i></p> <p>During records review of SoCalGas separately protected short sections of steel pipe (CP10), SED found clerical errors regarding the following CP10 mains' lower cathodic protection (CP) monitoring limit: TCEN060-13, T DOW022-1, TLA3025-3, TLA3032-2, THOL101-14, and TPAL018-1. Some CP documents stated the lower limit was -0.850 Volts while other documents stated -0.900 Volts instead.</p> <p>During the exit meeting on August 28, 2023, SED requested that SoCalGas ensure its gas standard is followed.</p> <p>On September 20, 2023, SoCalGas stated that it had reviewed all CP10 mains' monitoring limit to ensure the -900 millivolt (-0.900 Volts) limit is upheld in accordance with GS 186.0005. In addition, its System Protection Clerks have been assigned to review GS 186.0005. SED requests SoCalGas to provide documents demonstrating SoCalGas' efforts to address this finding as articulated (e.g., training records for System Protection Clerks).</p>

Response:

SoCalGas reviewed all CP10 read tolerances system-wide, and adjusted the minimum tolerance to be -900mV where needed. This effort was completed on 08/31/23. For any of these CP10s where the last read was between -850mV and -900mV, an order has been generated to go back out and address the out-of-tolerance reads.

On 08/22/23, training was assigned to all System Protection Clerks to review Gas Standard 186.005. The due date for the training was 09/05/23, and all clerks completed the training. In addition, this training (NOP00475) has been added to the annual training plan for the clerks. The completed training records and the updated annual training plan have been made available through the PS&C/CPUC SharePoint site.

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

5. Question Title, ID	Cathodic Protection Monitoring Criteria, TD.CPMONITOR.MONITORCRITERIA.O
Question	3. Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?
References	192.465(a) (192.463(b), 192.463(c), 192.463(a))
Assets Covered	Northwest - Mid City LA (87040 (57))

Issue Summary	<p>Title 49, CFR Part 192, Section 192.463(a) states:</p> <p><i>"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."</i></p> <p>During the field inspection on August 25, 2023, SED observed CP package SL 33-12-1 (-0.850 volt criterion) had the following pipe-to-soil read deficiencies:</p> <ul style="list-style-type: none"> o Read Point "L" measured -0.715 volt. o Read Point "X" measured -0.762 volt. <p>During the exit meeting on August 28, 2023, SED recommended SoCalGas follow its GS 186.0135 "Operation and maintenance of Cathodic Protection Facilities" and take the necessary corrective measures to restore the cathodic protection to the above CP package to ensure compliance with Title 49, CFR Part 192, §192.463(a).</p> <p>On September 20, 2023, SoCalGas provided follow up work orders 520003478634 and 520003494375 from its plan of remedial actions. SED requests SoCalGas to provide updates every 3 months until closure of the deficiencies.</p>
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Response:

SoCalGas is actively troubleshooting Cathodic Protection Area SL 33-12-1. An above ground electrical short has been found and cleared, and a damaged bond has been repaired; however, the area remains out of tolerance, so troubleshooting activities continue. As requested, SoCalGas will provide updates to SED every three months until the area has been brought into tolerance.

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

6. Question Title, ID	Cathodic Protection Monitoring, TD.CPMONITOR.TEST.R															
Question	5. Do records adequately document cathodic protection monitoring tests have occurred as required?															
References	192.491(c) (192.465(a))															
Assets Covered	Northwest - Mid City LA (87040 (57))															
Issue Summary	<p>SoCalGas' Gas Standard (GS) 186.0005, Cathodic Protection - Mixed Piping System, Section 5.3.2.1 states:</p> <p><i>"Any facility found during routine CP10 monitoring shall require remediation if the pipe to soil measurement is below -0.900 volts DC, in order to prevent possible loss of protection for the facility during the 10-year monitoring interval. The required remediation action shall be completed."</i></p> <p>During records review of SoCalGas' CP10 service read records, several services' "as left" readings were found to be below (less negative than) -0.900 volts:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 60%;">Service ID</th> <th style="width: 40%;">Year</th> </tr> </thead> <tbody> <tr> <td>00003879</td> <td>2019</td> </tr> <tr> <td>00184923</td> <td>2019</td> </tr> <tr> <td>00555555</td> <td>2019</td> </tr> <tr> <td>00555599</td> <td>2019</td> </tr> <tr> <td>00556092</td> <td>2019</td> </tr> <tr> <td>00556110</td> <td>2019</td> </tr> </tbody> </table>		Service ID	Year	00003879	2019	00184923	2019	00555555	2019	00555599	2019	00556092	2019	00556110	2019
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00003879	2019															
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	01835924	2019
	02019852	2019
	03967241	2019
	21235699	2019
	21283735	2019
	00011951	2019
	01661614	2019
	01843749	2019
	02566200	2019
	02566541	2019
	02749578	2019
	03472695	2019
	21761030	2019
	00919106	2020
	02742417	2020
	02742433	2020
	02567340	2020
	50039051	2021
	00187505	2021
	02748340	2021
SED requests SoCalGas to provide records demonstrating CP remediation of the above services per GS 186.0005.		

Response:

As stated in a prior response, as part of the process of correcting the minimum tolerances for CP10s, follow-up orders have been generated to go back out to the services where the last read was between -850mV and -900mV. The table below shows the follow-up order numbers or records updates for the identified CP10 services.

Service ID	Year	Follow-Up Order Number / Remediation / Record Update
00003879	2019	520003547488
00184923	2019	520003539508
00555555	2019	Record corrected to reflect that service is not a CP10. Service was replaced on order 540000414301 on 10/13/20.
00555599	2019	520003539508
00556092	2019	520003539524
00556110	2019	520003539524
01835924	2019	520003539525
02019852	2019	520003539508
03967241	2019	520003539524
21235699	2019	520003539529
21283735	2019	520003539525
00011951	2019	520003539530
01661614	2019	520003539531

01843749	2019	520003539532
02566200	2019	520003539533
02566541	2019	520003539512
02749578	2019	520003539510
03472695	2019	520003539510
21761030	2019	Record corrected to reflect that service is not a CP10. Service is a fittings-only branch.
00919106	2020	520003539501
02742417	2020	520003539258
02742433	2020	520003539258
02567340	2020	Record corrected to reflect that service is not a CP10. Service was abandoned on order 540000426241 on 05/01/21.
50039051	2021	520003539399
00187505	2021	520003539509
02748340	2021	Record corrected to reflect that service is not a CP10. AL riser was installed on order 540000485491 on 12/16/21.

Note that due to bundling of work, some of the CP10 services share the same remediation order numbers.

Training and Qualification: Qualification of Personnel - Specific Requirements (TQ.QU)

7. Question Title, ID	Corrosion Control Personnel Qualification, TQ.QU.CORROSION.R
Question	2. Do records indicate qualification of personnel implementing pipeline corrosion control methods?
References	192.453 (192.807(a), 192.807(b))
Assets Covered	Northwest - Mid City LA (87040 (57))
Issue Summary	<p>During records review of SoCalGas qualification records of SoCalGas' personnel implementing pipeline corrosion control, SED found that the following employees with IDs# were not listed in the historical Operator Qualification (OQ) spreadsheet SoCalGas provided during the audit:</p> <ul style="list-style-type: none"> · ID [REDACTED] · ID [REDACTED] · ID [REDACTED] · ID [REDACTED] <p>SED requests SoCalGas to provide SED the OQ records for the above personnel.</p>

Response:

SoCalGas provided the requested Operator Qualification records to SED on 10/26/23 in response to Data Request DR-30.

Generic Questions : Generic Questions (GENERIC.GENERIC)

1. Question Title, ID	Generic Question, GENERIC.GENERIC.GENOBERVE.O
Question	1. Generic question - please provide context in result notes.
References	N/A
Assets Covered	Northwest - Mid City LA (87040 (57))

Issue Summary	<p>Title 49, CFR Part 192, Section 192.161(b) states: "Each exposed pipeline must have enough supports or anchors to protect the exposed pipe joints from the maximum end force caused by internal pressure and any additional forces caused by temperature expansion or contraction or by the weight of the pipe and its contents."</p> <p>During the field inspection on August 24, 2023 in Juanita District, SED observed that the bridge & span (GD.PAC.JNT.BS.BMM27) was missing a support bracket for both pipelines. According to SoCalGas' Gas Standard (GS) 184.12, Inspection of Aboveground Pipeline and Pipelines on Bridge and Spans, Appendix A, Bridge Inspection Criteria and Required Actions, "Are there any pipe supports, bent, broken, loose, or missing?" shall be, "Repair or replace damaged supports from normal wear. Otherwise contact Planning and Engineering for evaluation".</p> <p>During the inspection, SoCalGas did not provide any documentation of attempts to complete this remedial action for this missing bridge & span supports. SED believes that the brackets had been missing for some time due to the homogenous color throughout the pipelines. During the exit meeting on August 28, 2023, SED recommended SoCalGas to address the observed condition.</p> <p>On September 20, 2023, SoCalGas provided a follow up work order and photos showing the support brackets had been installed for both pipelines. As a result, SED has determined that SoCalGas' response is satisfactory and considers this item to be closed.</p>
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