



Alex Hughes
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June 6, 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 (SoCalGas) San Joaquin Valley Transmission** on February 6 through February 10 and February 13 through February 17, 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 Taft, Saticoy, Valencia, Bakersfield, & Visalia districts.

SED staff did not identify any probable violations of G.O. 112-F, Reference Title 49 CFR, Parts 191& 192, but noted two (2) areas of concern. Attached are SoCalGas' written responses.

Please contact Alex Hughes at (949)697-2539 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, GSRB
Kan-Wai Tong, GSRB
Molla Mohammad Ali, GSRB
Matthewson Epuna, GSRB
Claudia Almengor, GSRB

2023 SoCalGas San Joaquin Valley Transmission Audit Response

Concern(s):

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	Northwest - San Joaquin Valley (87048 (65))
Issue Summary	<p>Title 49, CFR Part 192, Section 192:479(a) states that; <i>"Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section."</i></p> <p>During field inspections on 2/10/2023 in Valencia district, SED observed that valve 45-163-5, and the pipeline adjacent to the valve had atmospheric corrosion.</p> <p>SoCalGas must take appropriate action to ensure that portions of the pipeline that are exposed to the atmosphere are cleaned and coated, to ensure compliance with Title 49, CFR Part 192, Section 192:479(a).</p>

Response:

SoCalGas addressed the remediation for Valve 45-163-5 and the adjacent pipeline on February 16, 2023 and February 17, 2023 under work order 5200003298550. Pictures of the completed remediation were provided to SED on February 23, 2023. Copies of the pictures and the work order are available in the CPUC SharePoint site under San Joaquin Valley Transmission Audit folder "Valve 45-163-5 Remediation".

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

Question Title, ID	Cathodic Protection 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(a), 192.463(b), 192.463(c), Part 192, Appendix D)
Assets Covered	Northwest - San Joaquin Valley (87048 (65))
Issue Summary	<p>Title 49 CFR, Part 192, §192.465 (a) states that: <i>"Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of § 192.463."</i></p>

	<p>During field inspection on 2/13/2022 in Bakersfield district, SoCalGas recorded a pipe to soil read of -0.699V at the read point 7042-1.</p> <p>SoCalGas must take appropriate action to ensure that CP pipe-to-soil reads are within the tolerance for the established CP criteria, to ensure compliance with Title 49 CFR, Part 192, §192.465 (a).</p>
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Response:

Cathodic Protection Area RS 7042-1 was brought into tolerance with a read of -1.390 Volts on March 3, 2023 by bonding it to an adjacent protected line. A copy of the work order was provided to SED on March 13, 2023.