

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

October 10, 2023,

GI-2023-02-SCG-54

Mr. Rodger Schwecke  
Senior Vice President and Chief Infrastructure Officer  
Southern California Gas Company  
555 West 5th Street, GT21C3  
Los Angeles, CA 90013

SUBJECT: SED's Closure Letter for General Order (GO)112-F Gas Inspection of SCG's San Joaquin Valley Transmission Inspection Unit

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Southern California Gas Company (SoCalGas) response letter dated June 16, 2023. The letter addressed the findings identified during the General Order (G.O) 112-F inspection of SoCalGas' San Joaquin Valley Transmission Area conducted on February 6 through 10, 2023 and February 13 through 17, 2023.

Attached is a summary of the inspection findings documented by SED, SoCalGas' response to the findings, and SED's evaluation of SoCalGas' response to each identified Area of Concern.

This letter serves as the official closure of the 2023 GO 112-F Comprehensive Operation and Maintenance Inspections of SoCalGas' San Joaquin Valley Transmission Area.

Thank you for your cooperation in this inspection. If you have any questions, please contact Wilson Lule at (213) 392-4965 or by email at [wkl@cpuc.ca.gov](mailto:wkl@cpuc.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Matthewson Epuna".

Matthewson Epuna  
Program & Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

CC: Alex Hughes, SoCalGas, Kan Wai Tong, SED/GSRB, Molla Mohammad Ali, SED/GSRB, Claudia Almengor, SED/GSRB, Matthewson Epuna, SED/GSRB.

## Summary of Inspection

### 2023 SoCalGas San Joaquin Valley Transmission Inspection February 06 –10 & 13-17, 2023

#### Concerns:

#### **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 Title 49, CFR Part 192, Section 192:479(a) states that; *"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."*

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.

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).

#### Response:

SoCalGas addressed the remediation for valve 45-163-5 and the adjacent pipeline on February 16, 2023, and February 27, 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".

#### SED's Conclusion:

SED has reviewed SoCalGas' response and accepts the corrective actions that have been implemented. SED may verify the completion of corrective actions in the field during future inspections.

## 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 Title 49 CFR, Part 192, §192.465 (a) states that: "*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.*"

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.

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).

### **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.

### **SED's Conclusion:**

SED has reviewed SoCalGas' response and accepts the corrective actions that have been implemented. SED may verify the completion of corrective actions in the field during future inspections.