

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 10, 2023

GI-2023-04-SCG-51

Mr. Rodger Schwecke, Senior Vice President
Gas Transmission, Storage & Engineering
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 Southern California Gas Company's Basin Transmission Area Inspection Unit

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Southern California Gas Company's (SoCalGas) response letter dated August 16, 2023. The letter addressed the findings identified during the General Order (GO) 112-F inspection of SoCalGas' Basin Transmission Area that was conducted on April 17 to 21, 2023 and April 24 to 28, 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 Probable Violation.

This letter serves as the official closure of the 2023 GO 112-F Comprehensive Operation and Maintenance Inspection of SoCalGas' Basin 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.

Sincerely,

A handwritten signature in blue 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 Findings:
2023 SoCalGas Basin Transmission Area Inspection
April 17 –21 & 24-28, 2023**

Probable Violation:

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	T: Basin (87054 (51))
Issue Summary	<p>Title 49, CFR Part 192, Section 192.481(c) states that; <i>"If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by § 192.479."</i></p> <p>During field inspections on 4/20/2023, SED observed the following deficiencies:</p> <ol style="list-style-type: none"> 1. Appearance of pipe coating degradation, with evidence of chipped paint and atmospheric corrosion throughout the entire length of the Bridge Span (Span L1026 MP 26.80). <p>SoCalGas' follow up work order 5439469 was issued on October 26, 2019, for remediation of substandard conditions that were noted on the Bridge and span L1026 MP 26.80.</p> <ol style="list-style-type: none"> 2. Appearance of pipe coating degradation, with evidence of chipped paint and atmospheric corrosion at the base of the Bridge and Span L7677 MP 3.82. <p>SoCalGas had not completed remediation by the time of the SED's inspection, or by the next inspection due date after initial discovery. Therefore, SED finds SoCalGas in violation of Title 49, CFR Part 192, Section 192.481(c), for failure to provide protection against corrosion as required by §192.479.</p>

Response:

1. SoCalGas agrees that span L1026 MP 26.80 did not have the coating remediated at the time of SED's inspection in 2023. However, SoCalGas had previously identified the AOCs (abnormal operating conditions) for span L1026 MP26.80 on a routine Bridge & Span work order. When the AOCs were identified, SoCalGas created a follow up work order to correct the AOCs. The exemption for the Coastal Commission permit was granted and environmental clearance has been received. SoCalGas is currently waiting for scaffolding design approval before construction can begin. Construction is expected to begin in January 2024 with the pipeline isolation scheduled for February 2024.

SoCalGas does not have the proper, safe, approved scaffolding to access the pipeline. Once an approved scaffold design is available, SoCalGas will begin remediation on the span. Additionally, the pipeline upstream and

downstream of the span is within tolerance on their bi-monthly and annual CP reads, providing cathodic protection against corrosion per 49 CFR 192.463.

2. The span location listed in the audit letter "Line 7677 MP 3.82" does not exist. SoCalGas assumes the location described in the audit letter is L767 MP2.26 which was the span that was visited on Line 767 that day. SoCalGas disagrees with this determination. The AOCs (abnormal operating conditions) that were found during the SED audit which occurred on April 24, 2023, were first observed on that day. The AOCs observed during the audit were graffiti and one small coating spot on the pipeline with missing coating. The last documented day that this location was inspected was in November 2022 during a Pipeline Patrol order. The Bridge & Span inspection for L767 MP2.26 was completed on March 30, 2022. On neither the Pipeline Patrol order nor the Bridge & Span order were there any AOCs present. A follow up work order was created when the AOCs were observed on April 24, 2023, and repairs were completed on June 9, 2023.

SED's Conclusion:

To SoCalGas Response 1:

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.

To SoCalGas Response 2:

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.