

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 1, 2023,

GI-2023-07-SCG-42-15

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

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) reviewed Southern California Gas Company's (SoCalGas)' response letter, dated October 26, 2023, that addressed one (1) area of concern identified during the **General Order (G.O.)112-F Comprehensive Operation and Maintenance Inspection of SoCalGas' Honor Rancho Natural Gas Storage Field (Inspection Unit)**, starting July 24 through July 28 of 2023.

Attached is a summary of SED's inspection findings, SoCalGas' responses to SED's findings, and SED's evaluation of SoCalGas' responses to the findings.

This letter serves as an official closure of SED's 2023 Comprehensive Operation and Maintenance Inspection of SoCalGas' Inspection Unit. Any matters that may be considered for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this inspection. If you have any questions, please contact Randy Holter, Senior Utilities Engineer (Specialist), at (213) 576-7153 or by email at [randy.holter@cpuc.ca.gov](mailto:randy.holter@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Mahmoud Intably".

Mahmoud Intably, PE  
Program and Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

Attachments: see Post-Inspection Written Preliminary Findings  
cc: see next page.

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Safety and Enforcement Division

# Post-Inspection Written Preliminary Findings

**Dates of Inspection:** July 24 - July 28 of 2023

**Operator:** SOUTHERN CALIFORNIA GAS CO

**Operator ID:** 18484 (primary)

**Inspection Systems:** Honor Rancho Natural Gas Storage Facilities

**Assets (Unit IDs) with results in this report:** Honor Rancho (88720)

**System Type:** GT

**Inspection Name:** Honor Rancho NGS Facility

**Lead Inspector:** Randy Holter

**Operator Representative:** Austin Walker

## Unsatisfactory Results

No Preliminary Findings.

## 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),  
192.9(f)(1), 192.453, 192.491)

Assets Covered Honor Rancho (88720)

Issue Summary **Result Issue Summary (required):**

Title 49 CFR, Part 192, §192.479(a) states in part:

*"Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, ....", and*

Title 49 CFR, Part 192, §192.479(b) states,

*“Coating material must be suitable for the prevention of atmospheric corrosion.”*

During the field inspection on 7/26/23, at HR-SE3-04.0A-P, SED observed signs of atmospheric corrosion on an above ground pipeline at the pipe elbow and at the soil-to-air interface, with visible damage to the pipe wrappings (deteriorated).

SED recommends that SoCalGas takes the appropriate corrective action to clean and coat the pipe elbow and to re-wrap the pipe at the soil-to-air interface with suitable material to ensure compliance with Title 49 CFR, Part 192, §192.479(a)&(b).

**SoCalGas’ Response and Remedial Action:**

SoCalGas corrected the area in concern by cleaning, stripping, and repainting the pipe and by re-wrapping the pipe at the pipe to soil interface. The Maximo work order documenting the completion of this work is #8417052.

**SED’s Conclusion:**

SED reviewed SoCalGas’ work order #8417052, completed on 8/24/2023, along with photos showing the remediation including repainting the pipe and re-wrapping the pipe at the pipe to soil interface to protect the pipe from atmospheric corrosion. Therefore, SED considers this concern completed. **No further response is required by SoCalGas.**