

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 29, 2023

GI-2023-10-SCG-40-09-18

GI-2023-10-SDG-53-09-18

Mr. Rodger Schwecke, Senior Vice President
Gas Transmission, Storage & Engineering
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 conducted a **General Order 112-F Inspection of the Distribution Integrity Management Programs (DIMP)** of Southern California Gas Company (SoCalGas) and San Diego Gas and Electric Company (SDG&E) on October 17 through 19, 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. During the inspection, SED reviewed DIMP implementation, changes to the DIMP, and sample DIMP projects conducted in 2020. In addition, SED followed up on remedial efforts initiated by SoCalGas' & SDG&E's DIMP in response to SED's previous DIMP inspections in 2021 and 2022.

SED's staff identified zero (0) probable violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, and noted six (6) areas of concern which are described in the attached "Post-Inspection Written Preliminary Findings".

Please provide a written response within 30 days of your receipt of this letter indicating the measures taken by SoCalGas and SDG&E to address the concerns noted in the "Post-Inspection Written Preliminary Findings".

Thank you for your cooperation in this inspection. If you have any questions, please contact Gordon Huang, Utilities Engineer, at (213) 503-5083 or by email at ghg@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng".

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

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

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Post-Inspection Written Preliminary Findings

Dates of Inspection: 10/17-19/2023

Operators: SOUTHERN CALIFORNIA GAS CO and San Diego Gas & Electric CO

Operator IDs: 18484 (SoCalGas) 18112 (SDG&E)

Inspection Systems: Distribution Integrity Management Program (DIMP)

Assets (Unit IDs) with results in this report: (88391); (88390)

System Type: GD

Inspection Name: SoCalGas & SDG&E DIMP Inspection

Lead Inspector: Gordon Huang

Operator Representative: Austin Walker

Unsatisfactory Results

No Preliminary Findings.

Concerns

Generic Questions : Generic Questions (GENERIC.GENERIC)

1. Question Generic Question, GENERIC.GENERIC.GENPROCEDURE.P
Title, ID
Question 2. Generic question - please provide context in result notes.

References N/A

Assets Covered (88391), (88390)

Issue Summary SED discussed with SoCalGas and SDG&E their progress in addressing items raised in the 2021 and 2022 DIMP inspections. Among other items, SED acknowledged the ongoing research and efforts made by SoCalGas and SDG&E in the following initiatives:

- (i) recording plastic pipe joining information (2021 & 2022)
- (ii) training improvements for documenting pressure test results (2022)
- (iii) roles and responsibilities for ensuring Traceable Verifiable and Complete (TVC) pressure test data during closeout (2022)

SoCalGas and SDG&E noted that the associated efforts may take additional time to implement or are in the preliminary stages given the scope and stakeholder groups involved.

SED acknowledges these ongoing efforts and requests a status update on these initiatives following transmittal of SED's inspection report.

Gas Distribution Integrity Management: Knowledge of the System (GDIM.KN)

2. Question System Knowledge - Information Needed, GDIM.RA.INFONEEDS.P
Title, ID

Question 3. Do the procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?

References 192.1007(a)(3)

Assets Covered (88391), (88390)

Issue Summary Title 49, CFR Part 192, Section 192.1007(a)(3) states:

"Identify additional information needed and provide a plan for gaining that information over time through normal activities conducted on the pipeline (for example, design, construction, operations or maintenance activities)."

SoCalGas/SDG&E Distribution Integrity Management Plan, Part 2 (DIMP.2) - System Knowledge, page 4, Data Management, states:

"...the available data will be used to identify threats and to evaluate risk. To the extent possible, this information will be collected as part of normal activities, but if needed, new procedures or activities will be developed and put into practice. Specifically, the existence of undetermined data will drive review and improvement of the data collection processes and documented in the PAAR database."

However, these "data collection processes" are not defined or elaborated in its DIMP.2. It is unclear whether these relate to the data repositories mentioned earlier in its DIMP.2 and DIMP.C, data collection through "normal activities", or other sources. SED recommends that SoCalGas and SDG&E revise DIMP.2 to clarify and elaborate its data collection processes mentioned in its DIMP.2.

Gas Distribution Integrity Management: Identify Threats (GDIM.TH)

3. Question Identify Threats - Outside Sources, GDIM.RA.OUTSIDESOURCES.P
Title, ID

Question 3. Do the procedures consider, in addition to the operator's own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?

References 192.1007(b)

Assets Covered (88391), (88390)

Issue Summary Title 49, CFR Part 192, Section 192.1007(b) states, in part:

"An operator must consider reasonably available information to identify existing and potential threats."

SoCalGas/SDG&E Distribution Integrity Management Plan, Part 3 (DIMP.3) - Threat Identification, page 6 states, "Potential threats may be identified during field investigations,

from near misses, NTSB Reports, PHMSA Advisory Bulletins, Industry Incidents, and/or M&I activities." On page 14, records associated with threat identification include "...industry reports that were reviewed to identify new potential threats".

Following the 2020 inspection, SED had recommended that SoCalGas and SDG&E include additional available sources of knowledge to identify potential threats from trade associations and other operators. These include Gas Piping Technology Committee (GPTC), American Gas Association (AGA), Gas Technology Institute (GTI), Midwest Energy Association (MEA), Southern Gas Association (SGA), Northeast Gas Association (NGA), Western Energy Institute (WEI), other operators' best practices, etc. These sources may present information in the form of conference/workshop presentations, white papers, case studies, etc.

Although industry incident reports are a valuable source of industry knowledge, they are not the only ones. SED recommends SoCalGas and SDG&E to consider incorporating these other sources when identifying potential threats. In addition, SED recommends SoCalGas and SDG&E to revise its DIMP.3 to reference other external industry sources used and include recordkeeping requirements for information gained from those sources.

4. Question Identify Threats - Threats Considered, GDIM.RA.THREATCATEGORIES.P
Title, ID

Question 4. In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline?

References 192.1007(b)

Assets Covered (88391), (88390)

Issue Summary SED discussed with SoCalGas and SDG&E about the status, including currently active and near completion, of various Programs/Activities Addressing Risk (PAARs). Beyond the Sewer Lateral Inspection Project (SLIP) and Distribution Risk Evaluation & Monitoring System (DREAMS), SoCalGas and SDG&E have initiated other programs to address other threats such as the Daisy Chain Riser Replacement and First Stage Regulation programs. Although SoCalGas and SDG&E are in the process of pursuing and addressing these other identified system-specific threats, SoCalGas/SDG&E Distribution Integrity Management Plan, Part 3 (DIMP.3) - Threat Identification does not discuss or mention these other threats.

SED recommends SoCalGas and SDG&E to revise the Potential Threats section of DIMP.3 "Threat Identification" on pages 6 and 7 to reference SoCalGas' and SDG&E's PAARs when addressing these other identified system-specific threats.

Gas Distribution Integrity Management : Evaluate and Rank Risk (GDIM.RR)

5. Question Rank Risk - Methodology, GDIM.RA.RISKRANKING.P
Title, ID

Question 1. Do the procedures contain the method(s) and/or a model used to determine the relative importance of each threat and estimate and rank the risks posed?

References 192.1007(c)

Assets Covered (88391), (88390)

Issue Summary Title 49, CFR Part 192, Section 192.1007(c) states, in part:

"An operator must evaluate the risks associated with its distribution pipeline. In this evaluation, the operator must determine the relative importance of each threat and estimate and rank the risks posed to its pipeline..."

SoCalGas/SDG&E Distribution Integrity Management Plan, Part 4 (DIMP.4) - Evaluate and Rank Risk, pages 3 through 8 describe the general methodology of calculating risk, total risk, average risk per leak, use of weight factors, weight factor rationalization, and annual risk ranking validation. The process as outlined in DIMP.4 involves quantitative (pressure, number of repairs) and qualitative data (leak location, leak cause). In addition, a DIMP Risk

& Threat Steering Committee composed of relevant subject-matter experts that meet to discuss and coordinate risk ranking, remediation, and threat strategy on an annual basis.

However, during the inspection, SoCalGas and SDG&E stated that their Integrity Risk Strategy and Threat & Risk Assessment work groups have transitioned from the weight-based assessment model to their current Quantitative Risk Assessment (QRA) model since 2022. Other procedures such as SoCalGas Gas Standard (GS) 167.0262 and 167.0266 (SDG&E common documents D8141 and G8256 respectively) refer to the new evaluation process. However, this transition nor the QRA model are mentioned or described in DIMP.4.

SED requests SoCalGas and SDG&E to explain why the QRA model was not mentioned or described in DIMP.4. In addition, SED recommends SoCalGas and SDG&E to revise its DIMP.4 and related documents where needed to comprehensively describe its current QRA model (i.e., input parameters, risk modelling software, segment definition, input/output data repositories, and other necessary model information).

Gas Distribution Integrity Management : Measure Performance and Evaluate Effectiveness (GDIM.EV)

6. Question Measure Performance - Measure Effectiveness, GDIM.QA.MEASUREEFFECTIVENESS.P
Title, ID

Question 5. When measures are required to reduce risk, does the plan provide/describe what type and/or what specific performance measures will be used to measure effectiveness?

References 192.1007(e)

Assets Covered (88391), (88390)

Issue Summary Title 49, CFR Part 192, Section 192.1007(e) states, in part:

"(1) Develop and monitor performance measures from an established baseline to evaluate the effectiveness of its IM program. An operator must consider the results of its performance monitoring in periodically re-evaluating the threats and risks. These performance measures must include the following:

"...(vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program in controlling each identified threat."

SoCalGas/SDG&E Distribution Integrity Management Plan, Part 5 (DIMP.5) - Identify and Implement Measures to Address Risk, page 4 states program/activity-specific performance measures are developed for each Program/Activity to Address Risk (PAAR). These key performance indicators are categorized as leading (quality control) or lagging (quality assurance) indicators to measure performance and proper implementation.

DIMP.6 - Measure Performance, Monitor Results, and Evaluate Effectiveness discusses SoCalGas' and SDG&E's methodology to measure performance, monitor results, and evaluate the effectiveness of their DIMP and PAARs in further detail. However, there is no reference or mention of describing said PAAR-specific performance measures or other metrics which assess each program's effectiveness. SED recommends SoCalGas and SDG&E to include references to each PAAR's performance measure and metric as appropriate to each program in DIMP.5 & DIMP.6.