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November 10, 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 San Diego Gas and Electric Company's (SDG&E) Damage Prevention Program (DPP) and Public Awareness Program (PAP) on August 7 to 14, 2023. SED staff reviewed SDG&E's written programs, procedures, and associated records for the DPP for the period 2019 through 2022 and the PAP records for the period 2018 through 2022. In addition, SED's staff conducted field observations of SDG&E's pipeline locate and mark activities.

SED staff noted two (2) areas of concern. Below are SDG&E's written responses.

Please contact Alex Hughes at (213) 671-1344 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", is written over a light blue rectangular background.

Alex Hughes  
Pipeline Safety and Risk Mitigation Manager

CC:

Larry Andrews, SoCalGas  
Sann Naing, SED/GSRB  
Matthewson Epuna, SED/GSRB  
Claudia Almengor, SED/GSRB

## 2023 SDG&E Damage Prevention Program and Public Awareness Program Audit Response

**Concern:**

**Public Awareness and Damage Prevention : Damage Prevention (PD.DP)**

1) Question Title, ID	Documented Damage Prevention Program - TPD, PD.DP.TPD.P
Question	4. Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?
References	192.614(c)(1)
Assets Covered	SDG&E (87058 (48))
Issue Summary	<p>SDG&amp;E uses the number of damages per 1,000 USA tickets as one of key observations in its internal annual Public Awareness Program audits. This parameter is used as one of the criteria by the Damage Prevention (DP) industry to measure the effectiveness of the DP program. The industry uses the data reported by the operators in their PHMSA annual reports. While it is good practice to look at this data, it is also important that the data used for this evaluation be consistent and accurate. SED noted that SDG&amp;E's 2022 Public Awareness Program annual report showed the total damages in 2022 to be 246 while SDG&amp;E's annual PHMSA report (Form F7100-1) showed the total number of damages to be 302.</p> <p>Furthermore, review of the SDG&amp;E's annually reported data, SED noted that the damaged percentage related to "Locating Practices Not Sufficient" criterion (percentage of total excavation damages) has consistently increased in recent years, from 1% in 2019 to 5% in 2022 (2% - 2020 and 3% - 2021 respectively).</p> <p>SED recommends that SDG&amp;E review and evaluate its records and data to identify the inaccuracies in its data. Also, SED recommends that SDG&amp;E drive the improvements in identified areas.</p> <p>On September 11, 2023, SDG&amp;E provided the following response:</p> <p style="padding-left: 40px;"><i>"SDG&amp;E will evaluate data sources to verify consistency, accuracy and opportunities for further improvement."</i></p> <p>SED would like to request a status update on SDG&amp;E's identification of data deficiencies noted in SED's inspection findings.</p>

**Response:**

SDG&E is currently evaluating the data sources and will correct the discrepancies to improve the consistency and accuracy in the 2024 report.

**Concern:**

**Public Awareness and Damage Prevention : Damage Prevention (PD.DP)**

2) Question Title, ID	Damage Prevention Program, PD.DP.PDPROGRAM.R
Question	7. Does the damage prevention program meet minimum requirements specified in 192.614(c)?
References	192.614(c)
Assets Covered	SDG&E (87058 (48))
Issue Summary	<p>SDG&amp;E gas standard procedure, G8123 - Underground Service Alert and Temporary Marking, Section 4.6.19 states:</p> <p><i>"If previous company marks are visible within the delineated excavation location, the locator must attempt to verify those marks are accurate. Marks found to be inaccurate must be concealed. For example: Inaccurate marks on asphalt may be concealed with black paint. Notify supervisor if previous location marks for the same USA ticket appear to be marked at incorrect location."</i></p> <p>During the 2019 inspection of SDG&amp;E's Damage Prevention program, SED expressed its continued concern that SDG&amp;E's program procedure, as currently written. The procedure did not have a process to capture and document inaccuracies. Without such a process, it will be difficult to determine the root cause of actual issues and how to remediate it and prevent recurrence. SED recommends that SDG&amp;E establish a process to follow and document the outcome that may pinpoint the root causes of the inaccurate pipeline markings.</p> <p>On September 11, 2023, SDG&amp;E provided the following response:</p> <p><i>"SDG&amp;E will develop a written process within its gas standard. SDG&amp;E will provide a copy of the gas standard once it is updated."</i></p> <p>SED would like to request a status update on SDG&amp;E's effort to develop a written process within its gas standard.</p>

**Response:**

SDG&E is currently reviewing the Gas Standard G8123, *Underground Service Alert and Temporary Marking* section 4.6.19 pertaining to incorrect markings found. Updates to Gas Standard G8123 will be completed by Q1 2024.