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April 26, 2017

Mr. Ken Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
320 W. Fourth Street, Suite 500  
Los Angeles, CA 90013

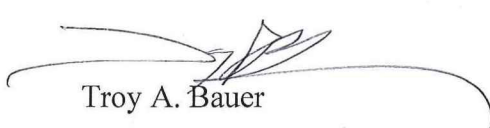
Dear Mr. Bruno:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112 Operation and Maintenance Inspection of Southern California Gas Company's (SoCalGas) Valves, Pressure Regulation and Overpressure Protection Facilities in the South Desert Transmission Area (Inspection Unit) from January 25-29, 2016. The inspection included a review of the Inspection Unit's Valves, Pressure Regulation, Overpressure Protection, and Welding records for calendar years 2013, 2014 and 2015 and field inspections of transmission pipeline facilities in the Beaumont and Blythe districts. SED staff also reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff identified three areas of concern during the course of this inspection. Attached is SoCalGas' response.

Please contact Troy A. Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,

  
Troy A. Bauer

CC: Durga Shrestha, SED/GSRB  
Kan Wai Tong, SED/GSRB

ATTACHMENTS

## **Transmission South Desert~ Blythe and Beaumont**

**January, 2016**

### **CPUC Audit - Response**

1. SoCalGas's Gas Transmission Work Order Number 5886294 showed that SoCalGas's employee inspected the valve #6900-34.51-12 on August 17, 2015 with no comment. During the field inspection on January 28, 2016, SED's staff observed the valve was in "closed" position even though the operator believed it should indicate normally open. The schematic available at the station also showed that the valve should be in "normally closed" position. Please explain if there was any event that caused this valve to be changed from "normally open" to "normally close".

### **RESPONSE:**

**Valve 6900-34.51-12 is "normally open," however when SED arrived at the location the valve 6900-34.51-12 was observed to be in the "closed" position. The valve was closed temporarily due to upstream pipeline construction on Line 1027. The schematic at this location shows this valve as normally open.**

2. On January 28, 2016, SoCalGas's Field Operation Supervisor for Transmission, stated that Transmission Pipeline Specialists (Transmission Valve Operators) were not trained to operate the transmission main valves using pneumatic actuator. He also stated that the Transmission Pipeline Specialists exercised the transmission valves using only the hydraulic actuator during its annual compliance inspection whenever the valve has both pneumatic and hydraulic actuator controller system. On the same day, a SoCalGas's technician was unable to operate the valve #6900-34.51-17 which had only pneumatic actuator system, instead he requested the Instrument Specialist to operate the valve. When asked, the technician replied that he was unable to operate the valve with the pneumatic actuator, which confirmed the supervisor's statement. However, SED's staff noticed that this valve was last inspected by the same technician on August 17, 2015, but no comment recorded in the SoCalGas Gas Transmission Work Order (Number 5886294). Please explain how the last valve inspection was completed by someone who could not operate the valve's pneumatic actuator system.

### **RESPONSE:**

**SoCalGas disagrees that the employee was unable to operate valve 6900-34.51-17's pneumatic actuator system. SoCalGas employee stated to SED that he does not normally operate valves pneumatically but he is properly operator-qualified to perform valve inspections.**

**During the 2015 inspection, the SoCalGas employee onsite was qualified, and he was also accompanied by two other qualified SoCalGas personnel. It is also an acceptable practice that if employees come across equipment that they do not routinely work with, they contact their peers or supervisor for assistance.**

**On the final day of this audit, the SoCalGas technician was asked to return to the site and operate valve 6900-34.51-17 using its pneumatic actuator system. At this time the employee demonstrated the ability to operate the valve without assistance.**

3. On January 28, 2016, SED's staff at Morongo Pressure Limiting Station on Line 6916 observed SoCalGas's employee replaced a dirty filter from regulator with a different size filter and started putting the system back into service. SED's staff pointed the difference in the filter sizes and the SoCalGas's employee inserted an identical sized filter and returned the system back into service safely. SED recommends SoCalGas evaluate its employees' performance to determine the effectiveness of its procedures.

**RESPONSE:**

**SoCalGas understands SED's recommendation and will review the applicable Gas Standard inspection requirements with affected Gas Transmission Department employees.**