

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 12, 2017

GI-2017-05-SCG-52-01C

Jimmie Cho, Senior Vice President
Gas Operations and System Integrity
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

SUBJECT: General Order 112 Inspection of SoCalGas Transmission Coastal Area

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112¹ inspection of Southern California Gas Company's (SoCalGas) Transmission Coastal Area (Inspection Unit) from May 1 through 5, 2017. The inspection included a review of the Inspection Unit's Patrolling, Leakage Survey and Odorant records for calendar years 2013 through 2016 and field inspections of pipeline facilities in the Goleta and Ventura Transmission 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 one probable violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192. SED also noted two concerns as described in the attached "Summary of Inspection Findings".

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by SoCalGas to address the violation and concerns noted in the Summary of Inspection Findings. If you have any questions, please contact Shuai "James" Zhang at (415) 603-1310 or by email at james.zhang@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

cc: Troy Bauer, SoCalGas/Pipeline Safety & Compliance
Terence Eng, SED
Kan Wai Tong, SED

¹ General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 15-06-044.

Summary of Inspection Findings

2017 SoCalGas Transmission Coastal Area - Inspection Unit (Goleta and Ventura) May 1 - 5, 2017

I. SED Identified Probable Violation

1. Title 49 CFR § 192.481(a) states:

*“Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:
Onshore: At least once every 3 calendar years, but with intervals not exceeding 39 months.”*

During SED’s record review of Bridge and Span compliance inspection, SED noted that SoCalGas did not complete a compliance span inspection of L-404@ M.P. 28.32 Rock Hill on 5/13/2013 (Work Order #5187451) because the span was inaccessible due to poison oak. The previous inspection of the span was completed on 5/24/2010 (Work Order #3906141). SoCalGas inspected the span next on 3/9/2016 (Work Order #6048843), nearly 6 years after its previous inspection. Therefore, SCG is in violation of General Order 112-F, Reference Title 49 CFR, Part 192, Section §192.481(a).

II. Areas of Concerns and Recommendations

1. While performing a field inspection along L-37 @ M.P. 24.98, SoCalGas noted a line marker was missing. A SoCalGas technician indicated that he would replace a new line marker and mark “No” in the Bridge & Span Inspection Checklist when asked “Are there any markers missing...?”. The technician should have marked it as “Yes” on the checklist due to its as-found condition and then state corrective action on the checklist (i.e. missing line marker replaced during inspection). SED recommends that SoCalGas technicians record the as-found condition and corrective actions while conducting operation and maintenance activities.
2. SED inspected a span on L-404 @ M.P. 11.05 (Darling Rd & Wells) and noted that the top half of the span was covered by a metal casing while the bottom half being exposed to the atmosphere. One end of the casing seemed to be very close or touching the span pipeline. SED recommends SoCalGas assess the conditions and determine if it is a shorted casing.