

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 21, 2021

GI-2021-08-SCG-40-09
GI-2021-08-SDG-53-09

Mr. Rodger Schwecke, Senior Vice President
Gas Transmission, Storage & Engineering
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

SUBJECT: General Order (GO) 112-F Gas Inspection of Southern California Gas Company, and San Diego Gas and Electric Company Distribution Integrity Management Program (DIMP) - Follow up and review of DIMP Projects

Dear Mr. Schwecke,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112-F inspection of Distribution Integrity Management Program (DIMP) of SEMPRA (Southern California Gas Company, SCG and San Diego Gas and Electric Company, SDG&E). The Inspection entailed follow-up and review of DIMP projects, and took place between August 16-20 and 23-27, 2021.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records that SED inspected during the inspection. SED discovered six concerns during the inspection which are outlined in the Summary.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by SEMPRA to address the concerns noted in the Summary.

If you have any questions, please contact Sikandar Khatri at (415) 703-2565 or by email at Sikandar.Khatri@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

Enclosure: Summary of Inspection Findings

cc:

Troy Bauer, Manager, Southern California Gas Company
Dennis Lee, SED
Claudia Almengor, SED

Summary of Inspection Findings

Dates of Inspection: August 16-20 and 23-27, 2021

Operator: SEMPRA (Southern California Gas Company, SCG and San Diego Gas and Electric Company, SDG&E)

Operator IDs: 18484 (primary) 18112

Inspection Systems: Distribution Integrity Management Program (DIMP)

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

System Type: GD

Inspection Name: SEMPRA DIMP 2021 Inspection

Lead Inspector: Sikandar Khatri

Operator Representative: Austin Walker, Sr. Pipeline Safety & Compliance Advisor

Unsatisfactory Results

No Preliminary Findings.

Concerns

Design and Construction : Construction (DC.CO)

(1) Question 5. Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285?

References 192.285(d) (192.285(a), 192.285(b), 192.285(c), 192.807(a), 192.807(b))

Assets Covered 88391, 88390 (Multi Unit)

Issue Summary SED reviewed a sample of construction documents of DIMP distribution projects. The information on plastic joiners and type of joints was available on "General Service Order, GSO" for services, however, SEMPRA (Southern California Gas Company, SCG and San Diego Gas and Electric Company, SDG&E) mentioned that for distribution mains projects, there is no form available, and only record is the "Completion Sketch". SED did not find this information on these sketches. On an inquiry, SEMPRA provided the names of foreman and a crew member who worked on a project (Construction Planning and Design, CPD Order: 540000014889), however, it was not clear who made the joints. Complete and accurate information is important for the integrity of the gas pipelines; therefore, SED recommends recording this information either on "Completion Sketch" or in other forms for retrieval when necessary.

Gas Distribution Integrity Management : Records Required to be Kept (GDIM.RC)

(2) Question 3. Has the operator maintained the required records?

References 192.1011

Assets Covered 88391, 88390 (Multi Unit)

Issue Summary (1) Southern California Gas Company, SCG has "Completion Sketch" for DREAMS (Distribution Risk Evaluation and Monitoring System) projects (this also applies to other distribution projects). The completion sketch has information about 'depth of cover' in the title block. For example, for project, CPD Order 540000014889, it says 'Install main with at least 36" cover below gutterflow'. SCG explained that it means that at least a depth of cover of 36" is maintained. However, as the "Completion Sketch" serves as a final and complete record showing the final conditions, SCG's language should indicate confirming that the pipeline has been installed as planned. Therefore, 'ed' must be added at the end of "install" to read it as 'installed main with at least 36" ...' to verify that the required cover has been maintained.

(2) For San Diego Gas and Electric Company, SDG&E, there is no "Completion Sketch", and the operator mentioned that the depth of cover is indicated in the form of trench details on construction drawings (Issue for Construction, IFC designs). SED would like to emphasize that the 'trench sketch' is the guideline/instructions for the project crew. Final depth of cover should be recorded either on as-built sketch or in another appropriate document.

(3) While reviewing GIPP (Gas Infrastructure Protection Project) projects (Gas Network Node numbers, GNN#1958154700, GNN# 2012150500, and GNN# 624289300), SCG was not able to provide assessment results of inspections, stating that ever changing updates to Java have made the tool glitchy. SED recommends that the DIMP team should investigate this issue as to what caused the tool to become glitchy to prevent further loss of records in the future.

Gas Distribution Integrity Management : GDIM Implementation (GDIM.IMPL)

(3) Question 7. Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed?

References 192.1007(a)

Assets Covered 88391, 88390 (Multi Unit)

Issue Summary The "leak Repair Form" used by the operator was discussed during the DIMP 2020 Inspection, and SED expressed concern on some issues. SEMPRA provided an update that a committee has been formed which will look into improvements to the form and this committee is and will continue to meet regularly to consider and make improvements.

During this Inspection, it was discussed and agreed that SEMPRA will send SED a quarterly summary of the meetings of this Committee held during each quarter outlining the issues discussed, solutions considered, the discussions held and actions and implementation steps and timelines, and any other relevant information. SED will request minutes of a particular meeting, as needed.

In addition, SEMPRA should provide information on actions taken addressing *separately each item* that was pointed out in DIMP 2020 Inspection. While improvements can be continuously made, these items should be addressed immediately. For the sake of reference, these observations are reproduced here:

(1) There was no "Equipment Failure" category

(2) The "Outside Force Damage Category" listed the options which should be under "Excavation Damage" such as 1st Party, 2nd Party and 3rd Party Damages. SEMPRRA should create separate category for "Excavation Damages".

(3) The "Outside Force Damage" category should have options like Vehicular Damage, Vandalism, and others as appropriate

(4) The "others" threat category has an option "Valve Stem Leak" which is better suited to be listed under "Equipment Failure". The threats coming from "Risk Model" under "Others" category should be closely scrutinized manually, and if they are better suited to other primary threat categories, then those be listed under appropriate category and changes should be made accordingly to the Leak Repair Form. The "Others" threat category should have least possible options possible.

Training and Qualification : OQ Protocol 9 (TQ.PROT9)

(4) Question 3. Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.

References 192.801(a) (192.809(a))

Assets Covered 88391, 88390 (Multi Unit)

Issue Summary Operator Qualification (OQ) records for personnel were available and those provided were checked. However, two programs i.e., DRIP (Distribution Riser Inspection Project) and GIPP (Gas Infrastructure Protection Project) employ Inspectors who perform the inspections required for these projects. DRIP is a SCG project and GIPP is currently for SCG only, and SDG&E part has already been completed. SED inquired about qualification and competency of the inspectors who perform the inspections and provide input and recommendation for mitigation. The operator was not able to provide any process or set standard procedure for competency of inspector for the tasks performed. The goals of these programs are to determine the unsatisfactory conditions and pipeline integrity related risk that could cause hazard to persons, property, or the environment. The operator also stated that these programs reference or follow the operation's procedures; DRIP (Procedure 184.0121) and GIPP (Procedures, 185.0001, 185.0002 and 185.0008).

Since, the DRIP and GIPP inspectors are using above mentioned procedures and these projects are pipeline integrity related, therefore the inspectors should be evaluated and trained for their competency to perform these tasks. SCG should ensure that these inspectors have the required qualifications by developing the detailed training/guidance manual encompassing all functions they perform and train the current and future inspectors accordingly. This should be accomplished within three months from the date of this letter. All training material and proof of imparting the training should be formally documented and retained.