

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 10, 2021

GI-2021-05-SCG-56-02-ABC

Mr. Rodger Schwecke  
Senior Vice President and Chief Infrastructure Officer  
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 (G.O.) 112-F Comprehensive Operation and Maintenance Inspection of Southern California Gas Company (SoCalGas)'s NW South Coast Distribution Districts** (Inspection Unit) on May 3 through May 7 and May 10 through May 14, 2021, for calendar years 2017 through 2020. SED conducted records review and field inspection of pipeline facilities in the Crenshaw and Santa Monica Distribution Districts.

SED's staff identified two (2) probable violations of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, and noted two (2) 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 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 Wilson Lule, Utilities Engineer, at (213) 392-4965 or by email at [wkl@cpuc.ca.gov](mailto:wkl@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

cc: Troy Bauer, SoCalGas  
Gwen Marelli, SoCalGas  
Mohammad M Ali, SED/GSRB  
Kan-Wai Tong, SED/GSRB  
Claudia Almengor, SED/GSRB

# Post-Inspection Written Preliminary Findings

**Date of Transmittal:** 07/19/2021

**Dates of Inspection:** May 03-14, 2021

**Operator:** SOUTHERN CALIFORNIA GAS CO

**Operator ID:** 18484 (primary)

**Inspection Systems:** Crenshaw and Santa Monica Districts

**Assets (Unit IDs) with results in this report:** Northwest - South Coast (87039)

**System Type:** GD

**Inspection Name:** 2021 SED NW SOUTH COAST DISTRIBUTION AUDIT

**Lead Inspector:** Wilson Lule

**Operator Representative:** Alex Hughes, James Cervantes

## Probable Violations

### 1. Pipeline Inspection (Field)

Question Title: Atmospheric Corrosion Monitoring

Question: Is pipe that is exposed to atmospheric corrosion protected?

References: 192.481(b), (192.481 (c), 192.479 (a), 192.479 (b), 192.479 (c))

Assets Covered: Northwest – South Coast (87039 (56))

Issue Summary: During the field inspection of the South Coast facilities, SED observed that exposed pipe at/or near ██████████ Mulholland Dr, Los Angeles had cracked pipe wrap and showed signs of atmospheric corrosion at several spots.

49 CFR §192.479 Atmospheric Corrosion Control, Item (b) states:

*"Coating material must be suitable for the prevention of atmospheric corrosion."*

SED finds SoCalGas in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.479(b) for failing to adequately protect its pipeline from atmospheric corrosion.

## 2. Generic Questions: Generic Questions (Aboveground pipe supports)

Question: Generic question – Does above ground pipe have enough supports to prevent undue stress on pipe?

References: 192.161(a), 192.161(b) and 192.361(d)

Assets Covered: Northwest - South Coast (87039 (56))

Issue Summary: During field inspection of SoCalGas' South Coast facilities, SED staff observed that an above ground 3/4-inch diameter and 60 feet long service line, at/or near ██████ Mulholland drive, Los Angeles was unsupported, and bent at one end to align the pipe to the sloping topography.

49 CFR, Part 192 §192.161 Supports and Anchors, Item (b) states:

*"Each exposed pipeline must have enough supports or anchors to protect the exposed pipe joints from the maximum end force caused by internal pressure and any additional forces caused by temperature expansion or contraction or by the weight of the pipe and its contents."*

SED finds SoCalGas in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.161(b) for failing to provide enough supports or anchors to prevent undue strain on the pipeline and its associated equipment.

## Concerns

### 1. Records: Operations and Maintenance

Question Title: Valve maintenance Distribution Lines

Question: Do records indicate proper inspection of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable?

References: 192.603(b) (192.747(a), 192.747(b))

Assets Covered: Northwest - South Coast (87039 (56))

Issue Summary: Valve #3750-04 in Santa Monica District and Valve 3702A-15 in Crenshaw District were both found "Hard to Operate" in their annual inspections in 2017. SoCalGas did not inspect them quarterly as required by their procedure 184.16. SoCalGas discovered this issue in its internal audit and revised its process so that "Hard to Operate" valves will be automatically generated in the quarterly inspection reports in SAP. SED is aware that this will no longer be an issue but wanted to note the finding for the record.

## 2. Pipeline Field Inspection: Pipeline Inspection (Field)

Question Title: Customer Meters and regulator protection

Question: Are meters and service regulators being protected from damage consistent with the requirements of 192.355?

References: 192.351 (192.355(a), 192.355(b), 192.355(c))

Assets Covered: Northwest - South Coast (87039 (56))

Issue Summary: Meters and service regulators located at ■■■ & ■■■ 55th Place, ■■■■ 57th St, are exposed to vehicular traffic. Also, a Meter-Set-assembly (MSA) at 3564 Federal Ave, Los Angeles, located in a pit (curb box) was partially buried in the dirt. To ensure that MSAs and service regulators are protected from vehicular traffic damage, SoCalGas should take appropriate actions, repair, and maintain the facilities to demonstrate compliance with Title 49 CFR, Part 192 Sections 192.353(a) & Part 192.355(b)(3).