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Mr. Mahmoud (Steve) Intably, P.E.  
Program and Project Supervisor, Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Dear Mr. Intably:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) submitted the attached Notice of Probable Violations (NOPV) for non-Department of Transportation (DOT) reportable incident investigations completed in year 2021.

Attached are San Diego Gas & Electric Company's (SDG&E) written responses.

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

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'T' and 'A' followed by a horizontal line.

Troy A. Bauer  
Pipeline Safety and Compliance Manager

CC: Gwen Marelli / SoCalGas  
Terence Eng / SED-GSRB  
Mahmoud (Steve) Intably / SED-GSRB  
M. Mohammad Ali / SED-GSRB  
Kan-Wai Tong / SED-GSRB  
Claudia Almengor / SED-GSRB

**Attachment A**  
**List of Incidents with Probable Violations**

<b>PUC ID</b>	<b>Date</b>	<b>Address</b>	<b>Utility</b>	<b>Third Party Entity</b>	<b>Code Violation(s)</b>
G20201110-3141	11/10/2020	█████ Redwood Street, San Diego	SDG&E	Lekos Electric	G.O. 112-F, Reference Title 49 CFR, Part 192, §192.614(c)(5).
<p><b>Investigative Finding</b></p> <p>On November 10, 2020, at approximately 1000 hours, a third-party contractor, Lekos Electric, struck an SDG&amp;E' 1½ -inch steel gas main with a wheel trencher while trenching for traffic light signals. This resulted in release of gas into the atmosphere, service interruption, and damage to the gas main. There were no injuries, fatalities, or third-party damage reported as the result of this incident. This incident was reported to the CPUC due to release of gas and major media coverage. SED's investigation found that the incident was caused by SDG&amp;E's failure to locate and field mark its 1½ -inch steel gas main within the area of excavation activity before the start of excavations (as described in a valid USA ticket). Therefore, SED finds SDG&amp;E in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.614(c)(5) for failure to provide for temporary marking of its buried pipeline within the area delineated for excavation.</p>					

**Response:**

- SDG&E puts public and employee safety as its top priority and is dedicated to learning from any incident that may occur as a result of its work activities. SDG&E acknowledges that the incident on 11/10/2020 at █████ Redwood Street in San Diego was the result of our company locator not following the Gas Standard G8123 – *Underground Service Alert and Temporary Markings* for temporary markings of Company subsurface installations on the ticket request A201541254.

**Corrective Actions:**

- SDG&E conducted a full investigation of this incident to determine the cause of the incident, who was responsible, what actions to take next, and what lessons could be learned from it.
- Due to an oversight, the employee failed to locate and mark the entire delineated area as prescribed in G8123.
- SDG&E temporarily suspended the locate and mark operator qualification of the employee who was responsible for completing the ticket. Previous tickets that were completed by this employee were reviewed for completeness and accuracy. No other errors or discrepancies were identified.
- On 11/17/2020, after the investigation was completed, the employee was given a warning for Failure to Follow Policy/Procedures in not verifying the delineated work area prior to marking out the Dig Alert Ticket.

- The employee has received refresher training on the Gas Standard G8123 – *Underground Service Alert and Temporary Markings* and a locator’s responsibilities which includes, but is not limited to, detailed reviews of each ticket to ensure all markings are being performed for the entirety of the requested delineated area of excavation. SDG&E reinstated the employee’s locate and mark operator qualification on 11/17/2020.
- This event was shared with all company locators at SDG&E, as well as the Quality Assurance team. While sharing this incident with employees, supervision stressed the importance of utilizing all available resources when conducting locate and mark tickets. This includes a thorough review of the assigned ticket request to validate the area of excavation, a walk-through of the entire job site to confirm the encompassed area that has been delineated, and if necessary, the ability to contact the ticket requestor should they have any questions about the extent of the requested area of excavation.