

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 8, 2022

Non-DOT completed in Q2-2022

Rodger Schwecke,  
Senior Vice President and Chief Infrastructure Officer  
Southern California Gas Company  
555 West 5<sup>th</sup> Street, GT21C3  
Los Angeles, CA 90013

Dear Mr. Schwecke,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) reviewed San Diego Gas and Electric Company (SDG&E)'s response letter dated August 5, 2022, addressing one (1) probable violation identified by SED during its investigation of Non-DOT reportable incident that occurred on April 28, 2022.

Attached is a summary of SED's investigation findings, SDG&E's response to SED's findings, and SED's evaluation of SDG&E's response to the probable violations.

This letter serves as official closure and any matters that are being considered for enforcement will be processed through the Commission's Citation Program or formal proceeding.

Thank you for your cooperation in this investigation. If you have any questions, please contact Mohammad Ali, Senior Utilities Engineer (Supervisor), at (916) 928-2109 or by email at [ma5@cpuc.ca.gov](mailto:ma5@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Mahmoud Intably".

Mahmoud (Steve) Intably, P.E.  
Program and Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

cc: See next page

Alex Hughes, Manager  
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## **Non-DOT Reportable Incident occurred on April 28, 2022**

### **Identified Probable Violation**

#### **1. G.O. 112-F, Reference Title 49 CFR, Part 192, §192.614(c)(5) states:**

(c) *“The damage prevention program required by paragraph (a) of this section must, at a minimum...*

*(5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.”*

On April 28, 2022, at approximately 1245 hours, SDG&E was notified of a third-party contractor, Schilling Paradise, struck a 0.75-inch steel gas stub with a mini excavator at 4020 44th St, San Diego, San Diego County. This resulted in release of gas into the atmosphere, service interruption, and damage to the gas lines. There were no injuries, fatalities, or third-party damage reported as a result of this incident. This incident was reported to the CPUC due to release of gas and major media coverage. Based on the investigation, SED found that Schilling Paradise had a valid USA ticket at the time of the incident and SDG&E failed to locate and field mark its subsurface installation (0.75-inch steel gas stub) within the area of excavation activity before the start of excavation. Therefore, SED found SDG&E in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, § 192.614(c)(5).

#### **SDG&E’s Response & Corrective Actions:**

##### **Response:**

SDG&E acknowledges that the company locator did not provide an accurate field mark of the one-foot-long stub within the area of excavation. All other subsurface installations were marked within the area of excavation.

##### **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. The damaged stub was removed from service on Work Order 510000882722 and the GIS map was updated to reflect accurate information.

The locate and mark team has discussed this incident and performed a refresher with all locators on utilizing all available resources when difficult-to-locate subsurface installations such as one foot stubs need to be marked per measurement.

##### **SED’s Conclusion:**

SED has reviewed SDG&E’s response and accepts the proposed investigations and corrective actions taken. SED acknowledges that the proposed corrective actions will promote and foster strong safety culture, and sufficiently address the probable violations. SED recommends no fines or penalty be imposed at this time.