



Alex Hughes
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September 15, 2023

Mr. Mahmoud (Steve) Intably, P.E.,
Program and Project Supervisor,
Gas Safety and Reliability Branch,
Safety and Enforcement Division,
California Public Utilities Commission,
320 W. Fourth Street, Suite 500
Los Angeles, CA 90013

Dear Mr. Intably:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) submitted the following Notice of Probable Violations (NOPVs) for Non-DOT reportable incident investigations completed in Q2 of 2023.

Below is San Diego Gas & Electric's (SDG&E's) written response.

Please contact Alex Hughes at (213) 671-1344 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", is written over a light blue rectangular background.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

CC:

Larry Andrews, SoCalGas
Terence Eng, GSRB
M. Mohammad Ali, SED
Kan-Wai Tong, SED
Sann Naing, SED
Gordon Huang, SED
Jordan Lin, SED
Claudia Almengor, SED

2023 SDGE 2nd Quarter Non-DOT Incident Investigation Response

Violation:

G.O. 112-F, Reference Title 49 CFR, Part 192, §§192.603(b), 192.605(b)(3), 192.614(c)(5) and 192.723(b)(1).

Address: Magnolia Ave & Kenney St. Santee, CA County: San Diego

On August 1, 2022, at approximately 1045 hours, a third-party contractor struck a SDG&E ¾-inch steel gas service stub resulting in a release of gas and damage to the pipe. SED's investigation found that the SDG&E failed to:

- Keep records necessary to administer the procedures established under §192.605. Thus, in violation of G.O. 112-F, Reference, Title 49 CFR, Part 192, §192.603(b).
- Making construction records, maps, and operating history available to appropriate operating personnel, provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins. Thus, in violation of G.O. 112-F, Reference, Title 49 CFR, Part 192, §192.605(b)(3).
- Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins. Thus, in violation of G.O. 112-F, Reference, Title 49 CFR, Part 192, §192.614(c)(5).
- Conduct a leakage survey at intervals not exceeding 15 months, but at least once each calendar year. Thus, in violation of G.O. 112-F, Reference, Title 49 CFR, Part 192, §192.723(b)(1).

Response & Actions:

Response:

SDG&E prioritizes public and employee safety and is dedicated to learning from any incident that may stem from its work activities. After conducting the investigation, SDG&E acknowledged that the ¾" stub was inaccurately recorded in our mapping system. However, the ¾" steel stub was not temporarily marked due to the inaccurate mapping record but due to the missing delineation of the excavated area. The company locator notified the third-party contractor about missing delineation and requested the excavator to properly delineate the area to be excavated. The third-party contractor did not delineate the area prior to conducting an excavation and damaging the ¾" service stub.

Also, SDG&E did perform all required leak surveys in this location according to the applicable requirements. When a leak survey of the gas main was conducted, this ¾" short stub that was connected to the gas main was within range of the leakage mitigation vehicle's optical methane leak detection equipment. However, SDG&E does not have sufficient records to prove that the ¾" stub was leak surveyed due to the ¾" stub not being shown on the leak survey map.

Corrective Action:

- The damaged section of the stub was removed from service under WO# 510000898767.

- SDG&E GIS was updated to show the remaining portion of the stub.
- The ¾” steel stub has been leak surveyed by Leakage Mitigation as of 11/19/2022, with no leaks found.
- SDG&E Damage Prevention team had a discussion with the third-party contractor concerning the abidance of Underground Service Alert requirements.
- SDG&E has a new Map Update Request process for reporting and correcting “as found” GIS discrepancies. All impacted organizations have been trained in the new process.

Violation:

G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a)

Address: 530 S. 38th St., San Diego, CA County: San Diego

On November 10, 2022, at approximately 1320 hours, SDG&E’s crew was saw cutting a concrete pavement at a street crossing for a gas main and service replacement project when the saw struck and damaged a 2-inch steel gas main, resulting in natural gas release into the atmosphere. There were no injuries, fatalities, or ignition. SED investigation found that the incident was caused by SDG&E crew’s failure to follow SDG&E’s Gas Standard G7451, reference CGC, §4216 requiring excavator to use hand tools within the tolerance zone to determine the exact location of the 2-inch steel gas main before using any power-driven tools and use care when using power driven tools to prevent damage to the subsurface installations within the tolerance zone. Therefore, SED found SDG&E in violations of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a).

Response & Actions:

Response:

SDG&E values the safety of the public and its employees and strives to learn from any incident that may stem from its work activities. SDG&E acknowledges that the crew did not use reasonable care to prevent damage to the 2-inch steel main when operating power-driven tools while removing the existing asphalt pavement to commence potholing activities within the tolerance zone.

Corrective Action:

- The damaged section of the gas main was replaced under work order #5300007232.
- Supervision has reviewed Gas Standard G7451 with the gas crew involved in this incident and emphasized the importance of using care when removing existing pavement and using hand tools within the tolerance zone to determine the exact location of the subsurface installation.

- The incident was shared and discussed with all applicable company employees to share lessons learned.
- SDG&E management will continue emphasizing the importance of exercising caution while performing construction activities, such as removing asphalt and concrete when excavating near underground facilities.
- Management will continue to annually review GS G7451 Prevention of Damage to Subsurface Installations with affected employees to reinforce precautions that shall be taken during construction activities to prevent damage to underground facilities.

Violation:

G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a)

Address: 4727 Silent Knoll Dr., Fallbrook, CA County: San Diego

On January 18, 2023, at approximately 0958 hours, SDG&E discovered an under-pressure event after an annual valve inspection. This resulted in a service interruption. SED found that the incident was caused by SDG&E's employees failing to:

- Remove dirt/debris from the valve box to verify the open starting position of the valve by locating the valve position indicator on the valve stem.
- Turn the valve counterclockwise toward the stop to verify that the valve is full open.
- Mark the starting position of the valve.
- Verify if the valve has a little or no movement before hitting the stop. In addition, the employees failed to report the condition to his/her Responsible Supervisor immediately.

In addition, the lack of clarity in the SDG&E's GS for the "worn-out valve stops" may have contributed to this incident. Furthermore, SED recommends SDG&E to requalify the employees involved in this incident to ensure they adhere to SDG&E's GS D8167.

Based on the aforementioned items, SED finds SDG&E in violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, §192.605(a).

Response & Actions:

Response:

SDG&E values the safety of the public and its employees and strives to learn from any incident that may stem from its work activities. SDG&E acknowledges that the technician did not accurately verify the open starting position of the valve prior to conducting the valve inspection, therefore relying on the paint markings inside the valve casing to determine the starting position.

Corrective Actions:

- Pipeline Operation supervision has reviewed gas standard D8167 with the Technician and reiterated the importance of verifying the valve's starting position before commencing the inspection.
- This incident was shared and reviewed with the entire Pipeline Operation department to stress the importance of following all critical steps prior to and during the valve inspection, and that supervision should be notified when abnormal operating conditions are discovered.
- SDG&E's engineering team is actively evaluating potential remediation options for this valve and has recommended it be removed from the critical valve program.
- SDG&E will update the Gas Standard D8167 to provide clear directions to process valves with worn-out stops, similar to the Inoperable Valve workflow.