

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 18, 2023

Non-DOT NOPV Q2-2023

Mr. Rodger Schwecke
Senior Vice President and Chief Infrastructure Officer
San Diego Gas and Electric Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

SUBJECT: Notice of Non-DOT Gas Incident Violations for San Diego Gas & Electric Company (SDG&E)

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submits the following Notice of Probable Violations (NOPV) for Non-DOT reportable incident investigations completed in Q2-2023. This letter serves as notification to you that as a result of our investigations, SED found SDG&E in violations of the following:

1. **General Order (G.O.) 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, §192.603(b) states:**

“Each operator shall keep records necessary to administer the procedures established under § 192.605.”

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

“General. Each operator shall prepare and follow for each pipeline a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.”

I. SDG&E’s Gas Standard (GS) D8167 Distribution Valves - Operation, Maintenance, and Inspection, § 4.1.5 states:

“Check the valve box for dirt and/or debris. Remove dirt/debris and dispose of properly.” And

II. §4.2.1.2 states in part:

“When inspecting a quarter-turn valve, verify the open starting position of the valve by locating the valve position indicator on the valve stem,”

- III. SDG&E's Gas Standard GS D8167 Distribution Valves - Operation, Maintenance, and Inspection, §4.2.1.3 states:

“Attempt to turn the valve counterclockwise towards the stop to verify that the valve is fully open.”

- IV. SDG&E's Gas Standard GS D8167 Distribution Valves - Operation, Maintenance, and Inspection, § 4.2.1.3.1 states:

“Mark the starting position on the pavement, valve stand, or other suitable location. If the casing is not in the paving, mark a suitable starting position as field conditions dictate (i.e., earth or grass).”

- V. SDG&E's GS D8167 Distribution Valves - Operation, Maintenance, and Inspection, §4.2.1.3.2 states:

“The valve should have a little or no movement before hitting the stop. If the valve continues to turn, stop turning the valve, and return the valve to the original position. The employee performing the inspection will report the condition to his/her Responsible Supervisor immediately.”

3. **G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(b)(3) states:**

“Making construction records, maps, and operating history available to appropriate operating personnel.”

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

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

5. **G.O. 112-F, Reference Title 49 CFR, Part 192, §192.723(b)(1) states:**

“A leakage survey with leak detector equipment must be conducted in business districts, including tests of the atmosphere in gas, electric, telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at other locations providing an opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year.”

6. **SDG&E Gas Standard G7451 – Company and Company-Contractor Damage Prevention Excavation Requirements, § 1.1 states:**

“Company and Company Contractor personnel performing excavation and/or construction activities must follow all State of California Regulations (i. e. California Government Code, Title 1, Division 5, Chapter 3.1, § 4216) to prevent damage to subsurface installations.”

I. **California Government Code (CGC), § 4216.4(a)(1) states in part:**

“Determining exact location of subsurface installations-(a)(1) Except as provided in paragraph (2), if an excavation is within the tolerance zone of a subsurface installation, the excavator shall determine the exact location of the subsurface installations in conflict with the excavation using hand tools before using any power-driven excavation or boring

equipment within the tolerance zone of the subsurface installations. In all cases the excavator shall use reasonable care to prevent damaging subsurface installations.” and

II. § 4216.4(a)(2)(B) states:

“An excavator may use power-operated or boring equipment for removal of any existing pavement only if there is no known subsurface installation contained in the pavement.”

The summary of the identified violations is listed in the Attachment A of this letter. Please provide a written response within 30 days of the date of this letter indicating the measures taken by SDG&E to address the violations noted in “Attachment A” of this letter.

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

Sincerely,



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Attachment

cc: See next page

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Attachment A
List of Incidents with Probable Violations

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Finding	Code Violation(s)
G 20220801-3413	8/1/2022	Magnolia Ave & Kenney St. Santee, CA County: San Diego	SDG&E	Amazon Valley Engineering, LLC	<p>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:</p> <ul style="list-style-type: none"> • 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). 	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).

G 20221110-3455	11/10/2022	530 S. 38th St., San Diego, CA County: San Diego	SDG&E	N/A	<p>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).</p>	G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a)
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G 20230118-3484	1/18/2023	4727 Silent Knoll Dr., Fallbrook, CA County: San Diego	SDG&E	N/A	<p>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:</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>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).</p>	G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a)
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