

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 9, 2024,

Non-DOT completed in Q2-2022

Rodger Schwecke,
Senior Vice President and Chief, Infrastructure Office
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

SUBJECT: Closure letter of Non-DOT Gas Incident Violation for San Diego Gas and Electric Company (SDG&E).

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 April 21, 2023, addressing two (2) probable violations identified by SED during its investigation of Non-DOT reportable incident that occurred on November 29, 2021.

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.

Sincerely,

A handwritten signature in blue ink that reads "Mahmoud Intably".

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

cc: See next page.

Alex Hughes, Manager
Pipeline Safety and Compliance
Southern California Gas Company

Larry Andrews, Emergency Strategy & Operations Manager
Emergency Management and Preparedness
Southern California Gas Company
555 West 5th Street
Los Angeles, CA 90013

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public utilities Commission

Kan-Wai Tong, P.E.
Senior Utilities Engineer (Supervisor)
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public utilities Commission

Molla Mohammad Ali, Ph.D., P.E.
Senior Utilities Engineer (Supervisor)
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public utilities Commission

Gordon Huang
Utilities Engineer
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public utilities Commission

Claudia Almengor
Associate Governmental Program Analyst
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public utilities Commission

Non-DOT Reportable Incident occurred on November 29, 2021

Identified Probable Violations

1. General Order (GO)112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, Section 192.605(a) states:

“Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.”

i. SDG&E Gas Standard G8123 – Underground Service Alert and Temporary Marking states, in part:

“4.6.9. Ensure and verify the location of all Company subsurface installations within the delineated area using:

- Use an approved locating instrument.*
- Use the most up-to-date copies of Company records, such as GIS maps, as-builts and drawings as additional resource information.*

4.6.9.2. If locator signal, maps, or records cannot verify Company owned subsurface installation locations, advise Distribution Regions or Transmission Management. Distribution Regions or Transmission Management must take additional actions [...] to find its exact location.”

SED investigation found that the Gas Distribution Locator failed to follow SDG&E’s Gas Standard G8123, Section 4.6.9.2 to advise the distribution regions to take additional actions to find the exact location of the 2-inch plastic gas main. Therefore, SED finds SDG&E in violation of GO 112-F, Reference, Title 49 CFR, Part 192, Section 192.605(a).

SDG&E’s Response:

SDG&E acknowledges that the company locator did not provide an accurate field mark of the 2” plastic gas main within the area of excavation, due to the tracer wire issue.

Corrective Actions:

- The employee was given coaching for failure to follow Policy/Procedures resulting in a “No Marks” incident.
- The employee has received refresher training on the Gas Standard G8123 - *Underground Service Alert and Temporary Markings* and on a locator’s responsibilities.
- The locate and mark team has discussed this incident and performed a refresher with all locators on utilizing all available resources when there are difficult-to-locate subsurface installations.

SED’s Conclusions:

SED has reviewed SDG&E’s response and determined the remedial actions taken and articulated by SDG&E are appropriate to the case as presented. SED has opted not to impose

a fine or penalty at this time. SED requests SDG&E to provide copies of the locators' refresher training records for retention.

- ii. **SDG&E Gas Standard 7257 – Tracer Wire Installation for Polyethylene**, requires two and three wire connections to have its stripped wire ends be crimped together with an approved Sta-Kon connector and the connections be sealed with Aquaseal and tape (Section 7257.1 F).

SED's investigation found that the tracer wire installer failed to follow SDG&E Gas Standard 7257, Section 7257.1F resulting in the tracer wires becoming disbonded and impacting SDG&E's efforts to locate the 2-inch plastic gas main. Therefore, SED finds SDG&E in violation of GO 112-F, Reference, Title 49 CFR, Part 192, Section 192.605(a).

SDG&E's Response:

SDG&E is unable to acknowledge nor deny SED's conclusion that the tracer wire installer failed to follow SDG&E Gas Standard 7257, Section 7257.1F, resulting in the tracer wires becoming disconnected and impacting SDG&E's efforts to locate the 2-inch plastic gas main. According to the original installation work order #1394340 - 1989, the crew installed insulated copper tracer wire. However, amidst the investigation, SDG&E found several segments of non-insulated tracer wire upstream and downstream of the damaged section of the 2-inch plastic gas main. It is presumable that the originally installed insulated tracer wire may have been damaged by a third-party excavator between 1989 and 2021, and replaced with a non-insulated non-company-approved tracer wire, without consulting SDG&E.

SDG&E prioritizes public and employee safety and is dedicated to learning from any incident that may stem from its work activities. Upon conducting the investigation, SDG&E located the tracer wire fault and completed repairs under work order 530000271158 on April 11, 2022. SDG&E is currently evaluating the area surrounding this incident to determine if other segments of tracer wire must be replaced with the company-approved insulated tracer wire to allow locating of the underground facilities (Notification #300000520912).

SED's Conclusions:

SED reviewed and acknowledged the plausibility of SDG&E's hypothetical. SED has also reviewed the remedial actions taken and articulated by SDG&E and determined they are appropriate to the case as presented. SED has opted not to impose a fine or penalty at this time. SED requests SDG&E to provide a status update on its tracer wire evaluation of surrounding pipe segments articulated in its response (Notification # 300000520912). When the evaluation has been concluded, SED requests SDG&E to share its findings and conclusions.

2. GO 112-F, Reference Title 49 CFR, Part 192, Section 192.614(C)(5) states:

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

SDG&E failed to provide field markings of the involved SDG&E 2-inch plastic gas main although the substructure lay within the area delineated for excavation. Therefore, SED finds SDG&E in violation of 112-F, Reference Title 49 CFR, Part 192, Section 192.614(c)(5).

SDG&E's Response

Please refer to response #1

SED's Conclusion:

SED has reviewed SDG&E's response and determined the remedial actions taken and articulated by SDG&E are appropriate to the case as presented. SED has opted not to impose a fine or penalty at this time. SED requests SDG&E to provide copies of the locators' refresher training records for retention.