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April 24, 2020

Mr. Terence Eng
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Ave, 2nd Floor
San Francisco, CA 94102

Dear Mr. Eng:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) submitted a Notice of Probable Violation (NOPV) to the Southern California Gas Company (SoCalGas) related to its investigation of the Department of Transpiration reportable incident #1263704 which occurred on November 11, 2019. Attached is SoCalGas' written response to SED's NOPV.

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, appearing to be "Troy A. Bauer", with a stylized flourish at the end.

Troy A. Bauer
Pipeline Safety & Compliance Manager

CC:
Mahmoud Intably, SED
Kan-Wai Tong, SED
Claudia Almengor, SED

DOT Reportable Incident (#1263704) that occurred on November 11, 2019

1) General Order 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, Section 192.614 states in part:

(a) Except as provided in paragraphs (d) and (e) of this section, each operator of a buried pipeline must carry out, in accordance with this section, a written program to prevent damage to that pipeline from excavation activities. For the purposes of this section, the term "excavation activities" includes excavation, blasting, boring, tunneling, backfilling, the removal of aboveground structures by either explosive or mechanical means, and other earthmoving operations.

...

And,

(c)(5) "The damage prevention program required by paragraph (a) of this section must, at a minimum...Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins."

During an SED interview with SoCalGas on November 18, 2019, a SoCalGas employee stated he misread the location on the USA ticket and cleared it without conducting a field visit to provide for temporary marking of SoCalGas buried pipelines (a four-inch steel main and a one-inch steel service). SED found SoCalGas failed to provide temporary markings of its buried pipelines in the area of excavation activity. Therefore, SED finds SoCalGas in violation of 192.614 for failure to carry out a written program which requires providing temporary markings of its buried pipelines in the area of excavation.

SED found one (1) instance in which the SoCalGas employee failed to provide for temporary markings of its buried pipelines and thus violated General Order 112-F, Reference Title 49 CFR, Part 192, Section 192.614.

SoCalGas Response:

SoCalGas agrees that the employee failed to provide temporary marking on the one-inch steel service. However, SoCalGas disagrees with SED's conclusion that the employee failed to provide temporary marking of the four-inch steel main. While the service was within the boundaries of the USA ticket description, the main was not, so it did not need to be marked. The USA ticket called for temporary marking in private property only. The steel main was in public property, and not covered within the parameters of the USA ticket. The Kor-Terra Ticket # W928800740GVIS states: (NO STREETS WITHIN WORK AREA).

SoCalGas Corrective Action:

The responsible employee acknowledged that he misread the address in the USA ticket. When he looked at SoCalGas' GIS system, there were no gas facilities in the area where he believed the work was being performed. Thus, the employee felt that a field visit was not warranted.

The employee's Locate & Mark qualification was suspended pending the investigation and additional training.

The employee's training records and Locate & Mark history were reviewed. No training anomalies were discovered, and there were no other mismark/fail to mark incidents in the employee's local (12 month) personnel file.

The employee was provided additional training and was re-Op Qualified on 12/03/2019.

The Distribution management team met on 01/07/2020 to review the incident in depth and discuss how future incidents could be prevented.

This incident was shared with other operating Districts in safety huddles as part of SoCalGas' safety program and continuous improvements to review and raise awareness of incidents across the workforce and service territory.