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February 13, 2020

Mr. Dennis Lee
Program & Project Supervisor
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. Lee:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submitted the attached Notice Of Probable Violations (NOPV) for non-Department of Transportation (DOT) reportable incident investigations completed as of the Second (2nd) Quarter of 2019.

Attached are San Diego Gas & Electric Company's (SDG&E's) written responses.

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 read "Troy A. Bauer", with a stylized flourish at the end.

Troy A. Bauer
Pipeline Safety and Compliance Manager

CC: Rodger Schwecke / SoCalGas
Matt Epuna / SED-GSRB
Mahmoud Intably / SED-GSRB
Kan-Wai Tong / SED-GSRB
Mohammad Ali / SED-GSRB
Terence Eng / SED-GSRB

Attachment A
List of Incidents with Probable Violations

PUC ID	Date	Address	Utility	Third Party Entity	Code Violation(s)
G20180202-2490	02/01/2018	██████████ San Diego	SDG&E	Man General Engineering	49 CFR §192.614(c)(5), CGC 4216.3(a)(1)(A)
Investigative Finding					
On 2/1/2018, a third-party contractor struck and damaged an unmarked 1.25-inch plastic service stub while doing directional boring. Based on the information gathered, the SDG&E GIS map incorrectly showed the location of the service stub, and the pipeline locator did not produce a signal in the field to indicate presence of the stub. SED found SDG&E in violation of 49 CFR §192.614(c)(5) and California Government Code Section 4216.3(a)(1)(A) for failure to provide temporary markings for its subsurface facilities.					

SDG&E Response:

SDG&E acknowledges that in this instance the Geographic Information System (GIS) map did not correctly show the location of the service stub. Upon investigation, SDG&E concluded that the stub in question was not correctly mapped in the as-built ('as constructed') documentation created by the construction crew when this work was completed several years ago. Consequently, when the as-built drawing data was transferred into the GIS mapping system it maintained the inaccurate location of the stub, and therefore the locator was unaware of its existence. The as-built mapping process has been reviewed and includes supervision oversight and review for as-built map preparation and completion prior to submittal for digitizing into the GIS mapping system. This incident appears to be an isolated event. Nevertheless, SDG&E will continue to monitor the process with supervision oversight to identify improvement opportunities and mitigate this risk.

Corrective Actions:

A GIS mapping update was submitted to correct the error, which included position tie downs to the property line (PL), shortening the stub to five feet in length and adding a "locating ball" to the end of the stub.

PUC ID	Date	Address	Utility	Third Party Entity	Code Violation(s)
G20180428-2537	04/28/2018	██████████ La Jolla	SDG&E	N/A	49 CFR §192.353(a), 49 CFR §192.605(a)
Investigative Finding On 4/28/2018, a vehicle struck a meter set assembly (“MSA”) in an alley resulting in a gas release and interruption of service to 33 customers. Based on the information gathered, SED found SDG&E in violation of 49 CFR §192.353(a) for failure to protect its gas meter. SED also points out that current SDG&E standard G8145 includes “MSA protection” as an AOC that, if identified, will require issuance of a corrective order.					

SDG&E Response:

SDG&E disagrees with the SED assessment that the meter in question was unprotected or identifiable as an Abnormal Operating Condition (AOC). The meter in question is positioned with concrete block walls in close proximity on two sides and located at the base of a stairway leading to a residence (as shown in the photos provided below). Based on this positioning, the meter was considered protected.

Corrective Actions:

SDG&E management will continue to emphasize the importance of the gas standard G8145, Leakage Surveys, Section 4.12.1, “Issue Follow up orders to investigate and correct any AOC’s encountered,” focusing particularly on Section 4.12.1.10 - “When MSA protection (barricades or barriers) are required per gas standard D7115, Barricades for Gas Meter Sets.” In addition, the gas standard D7115 will be updated to provide clarification on when to identify an exposure to vehicular traffic. An information bulletin will be circulated to communicate and reinforce the importance of reporting AOCs while performing leakage surveys/atmospheric corrosion inspections, focusing on instances related to ensuring MSAs are protected as required, per gas standard D7115.

Post Incident Installation of Meter Warning Device

