

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 13, 2020

G20190822-2888

Mr. Rodger Schwecke, Senior Vice President
Gas Transmission, Storage & Engineering
San Diego Gas and Electric Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submits the following Notice of Probable Violation (NOPV) letter as part of its investigation of the Department of Transportation (DOT) reportable incident (DOT#1268754) that occurred on August 22, 2019, in San Diego, CA. This incident resulted in property damage to a San Diego Gas and Electric (SDG&E) facility (1 1/4-inch steel gas service line) and cost of gas released in the amount of \$5,917, and a customer claim for loss of business revenue of \$429,846.

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

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. The 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.

1.1 SDG&E's Gas Standard G8123 Underground Service Alert and Temporary Markings, Section 6.3 states in part:

*"If there is any confusion with the USA ticket information or delineation has not been provided at the ticket location, then the locator will contact the excavator to accomplish the following:
6.3.2. Obtain from the excavator a clear description of where the marks are needed."*

During an SED interview with SDG&E on September 10, 2019, an SDG&E employee stated he found no delineation marks in the proposed excavation area. Based on his understanding of the description of the location provided on the USA ticket, he located and marked some of SDG&E's facilities but failed to locate and mark the 1 1/4-inch steel gas service line. In addition, he stated that he did not contact the excavator to obtain a clear description of where the marks were needed. SED found SDG&E failed to follow its Gas Standard G8123, Section 6.3 which required the operator to contact the excavator to determine the extent and location of the excavation and to obtain a clear description of where the marks were needed. Therefore, SED finds SDG&E in violation of 192.605(a) for failure to follow its own Gas Standard.

SED found one (1) instance in which the SDG&E employee failed to follow and comply with the requirement stated in SDG&E Gas Standard and thus 192.605(a). Therefore, SED found SDG&E

committed a total of one (1) violation of General Order 112-F, which incorporates Title 49 CFR, Part 192 by reference.

Within 30 days, please provide your response to the violation listed in this letter.

If you have any questions, please contact Desmond Lew, Senior Utilities Engineer, at (213) 576-7020 or by email at DL4@cpuc.ca.gov.

Sincerely,



Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

cc: Troy Bauer, Manager
Pipeline Safety and Compliance
Southern California Gas Company
555 West 5th Street
Los Angeles, CA 90013

Mahmoud Intably
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Kan-Wai Tong
Senior Utilities Engineer (Supervisor)
Gas Safety and Reliability Branch
Safety and Enforcement Division

Claudia Almengor
Associate Governmental Program Analyst
Gas Safety and Reliability Branch
Safety and Enforcement Division