

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 14, 2020

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

SUBJECT: Notice of Gas Incident Violations for San Diego Gas and Electric (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 the Second (2nd) Quarter of 2019. This letter serves as notification to you that as a result of our investigations, SED found SDG&E in violation of the following:

1. **Title 49 CFR §192.353(a) states in part:**
“(a) Each meter and service regulator, whether inside or outside a building, must be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage that may be anticipated.”
2. **Title 49 CFR §192.605(a) states in part:**
“(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.”
3. **Title 49 CFR §192.614(c)(5) states in part:**
*“(c) The damage prevention program required by paragraph (a) of this section must, at a minimum...
(5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.”*
4. **California Government Code (CGC) 4216.3(a)(1)(A) states in part:**
*“Unless the excavator and operator mutually agree to a later start date and time, or otherwise agree to the sequence and timeframe in which the operator will locate and field mark, an operator shall do one of the following before the legal excavation start date and time:
(i) Locate and field mark within the area delineated for excavation and, where multiple subsurface installations of the same type are known to exist together, mark the number of subsurface installations.
(ii) To the extent and degree of accuracy that the information is available, provide information to an excavator where the operator’s active or inactive subsurface installations are located.”*

The summary of the identified violation is listed in 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 violation.

For any questions, please contact Kan-Wai Tong at (213) 576-5700 or by email at Kan-Wai.Tong@cpuc.ca.gov.

Sincerely,



Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

CC: Troy Bauer / SoCalGas
Matt Epuna / SED-GSRB
Mahmoud Intabli / SED-GSRB
Kan-Wai Tong / SED-GSRB
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ATTACHMENT: List of Incidents with Probable Violations

Attachment A
List of Incidents with Probable Violations

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Finding	Code Violation(s)
G20180202-2490	2/1/2018	[REDACTED] San Diego	SDG&E	Man General Engineering	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 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.	49 CFR §192.614(c)(5), CGC 4216.3(a)(1)(A)
G20180428-2537	4/28/2018	[REDACTED] La Jolla	SDG&E	N/A	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.	49 CFR §192.353(a), 49 CFR §192.605(a)