

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 7, 2021

Non-DOT completed in Q3 of 2021

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

**SUBJECT:** Notice of Non-DOT Gas Incident Violations for San Diego Gas and Electric Co. (SDG&E)

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) submits the following Notice of Probable Violations (NOPV) for Non-DOT reportable incident investigations completed in Q3 of 2021. This letter serves as notification to you that as a result of our investigations, SED found SDG&E in violation of the following:

**1. General Order (GO) 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, §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. For transmission lines, the manual must also include procedures for handling abnormal operations.....”*

**1.1 SDG&E Gas Standard G7451 – Prevention of Damage to Subsurface Installations, §1.1 states:**

*“The Company and Company Contractor personnel performing excavation and/or construction activities shall follow all State of California Regulations (i.e. California Government Code, Title 1, Division 5, Chapter 3.1, Section 4216) to prevent damage to subsurface installations.”*

**1.2 California Government Code (CGC), §4216.4(a)(1) states in part:**

*“If an excavation is within the tolerance zone of a subsurface installation, the excavator shall determine the exact location of the subsurface installations in conflict with the excavation using hand tools before using any power-driven excavation or boring equipment within the tolerance zone of the subsurface installations. In all cases the excavator shall use reasonable care to prevent damaging subsurface installations.”*

1.3 **SDG&E Gas Standard G7451 – Prevention of Damage to Subsurface Installations, §6.3.3.1 states:**

*“Pothole all marked subsurface installation locations with hand tools within the tolerance zone. The tolerance zone hand excavating requirement is measured from the edge of the subsurface installation, as indicated by the owners and/or operators’ markings.”*

2 **GO 112-F, Reference Title 49 CFR, Part 192, §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.”*

The summary of the identified violations is listed in Attachment A of this letter. Please provide a written response within 30 days of receipt of this letter indicating the measures taken by SDG&E to address the violations noted in the “Attachment A” of this letter.

Thank you for cooperation in these investigations. If you have any questions, please contact M. Mohammad Ali, Senior Utilities Engineer (Supervisor) at (916) 928-2109 or by email at [ma5@cpuc.ca.gov](mailto:ma5@cpuc.ca.gov).

Sincerely,



Mahmoud (Steve) Intably, P.E.  
Program and Project Supervisor  
Gas Safety and Reliability Branch  
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Attachment A

cc: See next page

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**Attachment A**  
**List of Incidents with Probable Violations**

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Finding	Code Violation(s)
G 20210305-3182	3/5/2021	<div style="background-color: black; width: 20px; height: 15px; display: inline-block; vertical-align: middle;"></div> 32 <sup>nd</sup> Street, San Diego, San Diego County	SDG&E	N/A	<p>On March 5, 2021, at approximately 0811 hours, SDG&amp;E’s contractor, SE Pipeline Construction (SE Pipeline) was excavating using a backhoe when it damaged an SDG&amp;E’s 1-inch steel drip line, causing an unintentional release of natural gas into the atmosphere and a service interruption to 19 customers for approximately 17 hours. There were no fatalities, injuries, or fire reported as the result of this incident. SED found that:</p> <ul style="list-style-type: none"> <li>• SDG&amp;E’s employee failed to use hand tools within the tolerance zone to determine the exact location of the 1-inch steel drip line as required by its Gas Standard G7451, §1.1. Therefore, SDG&amp;E is in violation of §192.605(a) for not following its Gas Standard G7451, §1.1</li> <li>• SDG&amp;E’s employee failed to provide accurate temporary field marking for the 1-inch steel drip line and temporary field marking for the 12-inch steel drip pan. Therefore, SDG&amp;E is in violation of §192.614(c)(5) for failure to provide temporary marking of its buried pipelines in the area of excavation.</li> </ul>	G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a) and §192.614(c)(5).

G20210329-3198	3/29/2021	████ Merritt Blvd., La Mesa, San Diego County	SDG&E	N/A	On March 29, 2021, at approximately 1344 hours, SDG&E crews struck their own 3/4-inch steel service with a backhoe at █████ Merritt Blvd, La Mesa when they were excavating to install new gas service line. SED's investigation found that this dig-in incident was caused by SDG&E failing to follow the SDG&E's Gas Standard, G7451, § 4.3.3.1, and expose the properly marked SDG&E gas service line with hand tools prior to using power-driven excavation equipment within the tolerance zone. Therefore, SED finds SDG&E in violations §192.605 (a) for not following its Gas Standard G7451§ 4.3.3.1.	G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a)
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