



Alex Hughes
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August 5, 2022

Mr. Mahmoud (Steve) Intably, P.E.,
Program and Project Supervisor, Gas Safety and Reliability Branch,
Safety and Enforcement Division,
California Public Utilities Commission,
320 W. Fourth Street, Suite 500
Los Angeles, CA 90013

Dear Mr. Intably:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) submitted the following Notice of Probable Violations (NOPV) for Non-DOT reportable incident investigations completed in Q3 of 2022.

Below is the San Diego Gas & Electric (SDG&E) written response.

Please contact Alex Hughes at (949)697-2539 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", is written over a light gray rectangular background.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

CC:

Gwen Marelli, SoCalGas
Terence Eng, SED
Mohammad Ali, SED
Kan-Wai Tong, SED
Gordon Huang, SED
Gordon Kuo, SED
Claudia Almengor, SED

2022 SDGE 3rd Quarter Non-DOT Incident Investigation Response

Violation(s):

PUC ID	Date	Address	Utility	Third Party Entity	Code Violation(s)
G20210909-3264	9/9/2021	2001 Main St., Chula Vista, CA. County: San Diego	SDG&E	N/A	G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(b)(3)
<p>On September 9, 2021, at approximately 1555 hours, an SDG&E aboveground distribution regulator station malfunctioned resulting in a service interruption. SED's investigation found that the incident was caused by unauthorized persons tampering with a regulator station valve. During the investigation, SED found a discrepancy in SDG&E's regulator station design records, where in an upstream branch valve was not shown in RS 1344 regulator station diagram. Therefore, SED finds SDG&E to be in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(b)(3).</p>					

Response:

SDG&E acknowledges that the reg station 1344 diagram did not include a 1/4" appurtenance valve.

Corrective Actions:

·SDG&E has updated the diagram to include the 1/4" appurtenance valve.

·Pipeline Operations Supervision reviewed Gas Standard G8159 - Distribution Pressure Regulating and Monitoring Station & Vault - Inspection, Maintenance, and Settings, with all Pipeline Operations Regulator Technicians and stressed the importance of verifying the station schematic is correct and reporting discrepancies.

PUC ID	Date	Address	Utility	Third Party Entity	Code Violation(s)
G20220406-3363	4/6/2022	1130 Emerald Ave, El Cajon, County: San Diego	SDG&E	HHS Construction	G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(b)(3) and §192.614(c)(5)

On April 6, 2022, at around 1317 hours, a third-party contractor, HHS Construction, struck an SDG&E 1/2-inch plastic service line with a horizontal boring machine, resulting in damage to the service line, release of natural gas into the atmosphere and a service interruption. SED's investigation found that the incident was caused by SDG&E failing to make the construction maps/records available to its locator and provide the temporary markings for the service line as required by a valid USA ticket prior to the excavation. Therefore, SED finds SDG&E in violations of G.O. 112-F, Reference Title 49 CFR, Part 192, Sections 192.605(b)(3) and 192.614(c)(5).

Response:

SDG&E acknowledges that the company locator did not provide an accurate field mark of the 1/2" service line within the area of excavation.

Corrective Actions:

- The damaged segment of service was repaired on Work Order 530000274953 and the GIS map was updated to reflect the most current information.

- SDG&E has a new Map Update Request process for reporting and correcting as-found GIS discrepancies. All impacted organizations have been trained in the new process.