



Alex Hughes
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April 21, 2023

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 Q2 of 2022.

Below is San Diego Gas & Electric's (SDG&E's) 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 blue rectangular background.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

cc: Larry Andrews, SoCalGas
Terence Eng, GSRB
M. Mohammad Ali, SED
Kan-Wai Tong, SED
Gordon Huang, SED
Claudia Almengor, SED

2022 SDGE 2nd Quarter Non-DOT Incident Investigation Response 2

Violation:

General Order (GO)112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, Section 192.605(a)

SDG&E Gas Standard G8123 – Underground Service Alert and Temporary Marking states, in part:

“4.6.9. Ensure and verify the location of all Company subsurface installations within the delineated area using:

-Use an approved locating instrument.

-Use the most up-to-date copies of Company records, such as GIS maps, as-builts and drawings as additional resource information.

4.6.9.2. If locator signal, maps, or records cannot verify Company owned subsurface installation locations, advise Distribution Regions or Transmission Management. Distribution Regions or Transmission Management must take additional actions [...] to find its exact location.”

SED investigation found that the Gas Distribution Locator failed to follow SDG&E’s Gas Standard G8123, Section 4.6.9.2 to advise the distribution regions to take additional actions to find the exact location of the 2-inch plastic gas main. Therefore, SED finds SDG&E in violation of GO 112-F, Reference, Title 49 CFR, Part 192, Section 192.605(a).

Response:

SDG&E acknowledges that the company locator did not provide an accurate field mark of the 2” plastic gas main within the area of excavation, due to the tracer wire issue.

Corrective Actions:

- The employee was given coaching for failure to follow Policy/Procedures resulting in a “No Marks” incident.
- The employee has received refresher training on the Gas Standard G8123 - *Underground Service Alert and Temporary Markings* and on a locator’s responsibilities.
- The locate and mark team has discussed this incident and performed a refresher with all locators on utilizing all available resources when there are difficult-to-locate subsurface installations.

Violation:

General Order (GO)112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, Section 192.605(a)

SDG&E Gas Standard 7257 – Tracer Wire Installation for Polyethylene, requires two and three wire connections to have its stripped wire ends be crimped together with an approved Sta-Kon connector and the connections be sealed with Aquaseal and tape (Section 7257.1 F).

SED's investigation found that the tracer wire installer failed to follow SDG&E Gas Standard 7257, Section 7257.1F resulting in the tracer wires becoming disbonded and impacting SDG&E's efforts to locate the 2-inch plastic gas main. Therefore, SED finds SDG&E in violation of GO 112-F, Reference, Title 49 CFR, Part 192, Section 192.605(a).

Response:

SDG&E is unable to acknowledge nor deny SED's conclusion that the tracer wire installer failed to follow SDG&E Gas Standard 7257, Section 7257.1F, resulting in the tracer wires becoming disconnected and impacting SDG&E's efforts to locate the 2-inch plastic gas main.

According to the original installation work order #1394340 - 1989, the crew installed insulated copper tracer wire. However, amidst the investigation, SDG&E found several segments of non-insulated tracer wire upstream and downstream of the damaged section of the 2-inch plastic gas main. It is presumable that the originally installed insulated tracer wire may have been damaged by a third-party excavator between 1989 and 2021, and replaced with a non-insulated non-company-approved tracer wire, without consulting SDG&E.

SDG&E prioritizes public and employee safety and is dedicated to learning from any incident that may stem from its work activities. Upon conducting the investigation, SDG&E located the tracer wire fault and completed repairs under work order 530000271158 on April 11, 2022. SDG&E is currently evaluating the area surrounding this incident to determine if other segments of tracer wire must be replaced with the company-approved insulated tracer wire to allow locating of the underground facilities (Notification #300000520912).

Violation:

GO 112-F, Reference Title 49 CFR, Part 192, Section 192.614(C)(5)

“Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.”

SDG&E failed to provide field markings of the involved SDG&E 2-inch plastic gas main although the substructure lay within the area delineated for excavation. Therefore, SED finds SDG&E in violation of 112-F, Reference Title 49 CFR, Part 192, Section 192.614(c)(5).

Response & Actions:

Response:

Please refer to response #1