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February 16, 2024

Mr. Terence Eng, P.E.,
Program Manager, Gas Safety and Reliability Branch,
Safety and Enforcement Division,
California Public Utilities Commission,
505 Van Ness Ave, 2nd Floor
San Francisco, CA 94102

Dear Mr. Eng:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order (G.O.) 112-F Distribution Construction Inspection of Southern California Gas Company (SoCalGas) facilities on December 15, 2023. The Distribution Construction Inspection involved a gas service replacement including the tapping to a SoCalGas 6-inch steel gas main in the vicinity of 482 Vineyard Pl, Pasadena, Los Angeles County.

SED's staff identified two (2) probable violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192. Below is SoCalGas's written response.

Please contact Alex Hughes at (213) 671-1344 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", with a long horizontal flourish extending to the right.

Alex Hughes
Pipeline Safety and Risk Mitigation Manager

CC:

Larry Andrews, SoCalGas
Mahmoud Intably, SED/GSRB
Kan-Wai Tong, SED/GSRB
Gordon Huang, SED/GSRB
Claudia Almengor, SED/GSRB

2023 SoCalGas Distribution Inspection 482 Vineyard Pl, Pasadena Response

Violations:

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

“Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.”

SoCalGas’ Gas Standard 184.0200, Underground Service Alert and Temporary Marking, Section 4.6, “Temporary Marking of Company Subsurface Installations” states in part:

“4.6.10. 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, and*
- *Use service history data to assist in the determination and placement of accurate surface markings for mapped and unmapped services, service stubs, or service cutbacks”*

2. G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, Section 192.614(c)(5) states in part:

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

During SED’s field inspection with SoCalGas’ contractor (NPL Construction Company), SED found that the contractor had already exposed the pre-existing service (½-inch plastic insert into ¾-inch steel) and installed a section of the new service (½-inch PE) via pneumatic bore. However, the contractor did not locate and mark the pre-existing 6-inch steel gas main prior to excavation within their delineated area because the locating equipment did not generate strong enough signal to confirm the location of the main. In addition, the contractor did not use other records, such as GIS maps, as-builts and drawings as additional resource information to mark the main prior to excavation either.

Consequently, SED found one (1) instance in which SoCalGas’ contractor failed to follow and comply with the requirements stated in SoCalGas’ Gas Standard 184.0200 and thus 192.605(a), and one (1) instance in which SoCalGas’ contractor failed to comply with 192.614(c)(5) for not providing temporary marking for its underground facilities prior to excavation. Therefore, SED found that SoCalGas committed a total of two (2) violations of General Order 112-F which incorporates Title 49 CFR Part 192 by reference.

Response:

SoCalGas puts public and employee safety as its top priority and is committed to learning and improving its processes and procedures.

SoCalGas acknowledges on 12/15/2023, SED visited and inspected a multi-phased service replacement at 482 Vineyard Place, Pasadena CA. During SED's visit the contractor was working the initial phase.

During the inspection, SED issued a violation because SoCalGas' contractor failed to locate and mark the gas main. Per Gas Standard 184.0200, CFR 192.605(a), and CFR 192.614(c)(5), the contractor was not required to locate and mark the gas main because it was not in proximity of the "excavation activity" per CFR 192.614(C)(5) which states: "provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins". The contractor located and provided reference marks of the service line that was in the "excavation activity" per Gas Standard 184.0200.

Because the gas main was outside of the contractor's excavation activity, Gas Standard 184.0200 and CFR sections 192.605(a) and 192.614(c)(5) do not apply.