

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 18, 2024

ConstD-20231215-58-1

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

Dear Mr. Schwecke:

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. This letter serves as a **Notice of Probable Violation to SoCalGas** for the violations identified by SED during this inspection. The details of the violations are itemized below:

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.”

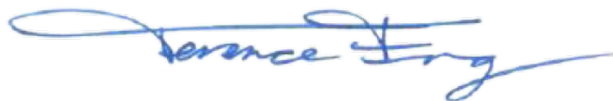
During SED’s field inspection with SoCalGas’ contractor (NPL Construction Company), SED found that the contractor had already exposed the pre-existing service (½-inch plastic insert into ¾-inch steel) and installed a section of the new service (½-inch PE) via pneumatic bore. However, the contractor did 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.

Within 30 days, please provide your response to each of the violations listed in this letter. If you have any questions, please contact Gordon Huang, Utilities Engineer, at (213) 503-5083 or by email: ghg@cpuc.ca.gov

Sincerely,



Terence Eng, P.E.
Program Manager
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cc: See next page

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