

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 2, 2020

G20190715-2857

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

**SUBJECT: Notice of Gas Incident Violations for Southern California Gas Company (SoCalGas)**

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submits the following revised Notice of Probable Violations (NOPV) letter as part of its investigation of the DOT reportable incident (DOT #1252045) that occurred on July 15, 2019 in Murrieta, CA. The incident resulted in one fatality and one injury requiring in-patient hospitalization. This revised NOPV letter is to provide clarity to SED's letter dated September 27, 2019.

**1. General Order 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. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.”*

**1.1 SoCalGas' Gas Standard 183.03, Field Guidelines-Emergency Incident Distribution/Customer Service requires the following:**

- A. *Section 4.1.1.1, Factors in Determining Field Action, Public Safety requires SoCalGas' employees to restrict people from any hazardous area or buildings and maintain proper liaison with police and fire department.*

During SED interviews with SoCalGas, SoCalGas employees stated they did not restrict people from any hazardous area or buildings and did not tell the Fire Department to restrict people from going into the buildings. SED found that SoCalGas failed to restrict people from any hazardous area or buildings and maintain proper liaison with police and fire department. Therefore, SED finds SoCalGas in violation of 192.605(a) for not following its own procedure.

- B. *Section 4.2.1 requires SoCalGas' employees to immediately conduct an on-site evaluation of the potential hazards to life and property resulting from escaping gas.*

During SED interviews with SoCalGas, SoCalGas employees acknowledged they did not conduct an on-site evaluation of the potential hazards to life and property resulting from escaping gas. SoCalGas failed to conduct an on-site evaluation of the potential hazards to life and property resulting from escaping gas to determine the extent of the gas leak and take the necessary steps to protect life and property. Therefore, SED finds SoCalGas in violation of 192.605(a) for not following its own procedure.

- C. *Section 4.2.5 requires SoCalGas' employees to determine if the concentration of escaping gas is sufficient to make ignition a possibility, especially in or under structures, whether from underground migration or air movement, and to check and monitor perimeters of the area hazard.*

During SED interviews with SoCalGas, SoCalGas employees acknowledged not doing a gas migration survey. Absent a gas migration survey, the concentration of escaping gas was unknown, and the possibility of ignition was unknown. SED found that SoCalGas failed to determine if the concentration of escaping gas was sufficient to make ignition a possibility. Therefore, SED finds SoCalGas in violation of 192.605(a) for not following its own procedure.

- D. *Section 4.2.13 requires SoCalGas' employees to maintain surveillance of uncontrolled escaping gas using an approved combustible gas detector to minimize the potential hazard to the general public until assistance arrives.*

During SED interviews with SoCalGas, SoCalGas employees stated they did not use any approved combustible gas detector to maintain surveillance of uncontrolled escaping to minimize the potential hazard to the general public until assistance arrived. Therefore, SED finds SoCalGas in violation of 192.605(a) for not following its own procedure.

- E. *Section 4.3.1 requires SoCalGas' response crew upon arrival at the scene to immediately assess the potential hazards of escaping gas. The response crew leader shall review the status of the incident with the responsible company employee on the scene or perform the action and evaluation procedures.*

During SED interviews with SoCalGas, SoCalGas employees stated that the response crew arrived on the scene but did not assess the potential hazards of escaping gas. Furthermore, the crew leader did not review the status of the incident with the response crew. Rather, the response crew left shortly after the arrival of the crew leader. SED found that the response crew leader failed to review the status of the incident with the responsible company employee on the scene or perform the action and evaluation procedures. Therefore, SED finds SoCalGas in violation of 192.605(a) for not following its own procedure.

- F. *Section 4.3.2.3 requires SoCalGas' employee to wear appropriate respiratory protective equipment and Gas Extraction Suit if gas was blowing freely when the crew is planning to control the gas at the point of discharge.*

During SED interviews with SoCalGas, SoCalGas' employees acknowledged not using respiratory protective equipment and a Gas Extraction Suit. SED found that SoCalGas failed to follow SoCalGas' Gas Standard to wear respiratory protective equipment and Gas Extraction Suit while trying to control the blowing gas at the point of discharge. Therefore, SED finds SoCalGas in violation of 192.605(a) for not following its own

procedure.

1.2 SoCalGas' Gas Standard 184.0245 Leak Investigation, requires SoCalGas' employees conducting leak investigation to do the following:

A. *Section 4.1.1.1 requires SoCalGas' employees to leave Form 2001 - Customer Communication Tag – Distribution if the customer is not present.*

During SED interviews with SoCalGas, SoCalGas employees stated they knocked on the customer's door, received no response, and did not leave Form 2001 Customer Communication Tag at the door. The tag was designed to alert tenants of an existing potentially hazardous condition and advise them to contact SoCalGas' employees for assistance prior to access the buildings. SoCalGas failed to complete and leave Form 2001 – Customer Communication Tag - Distribution at the resident's house. Therefore, SED finds SoCalGas in violation of 192.605(a) for not following its own procedure.

SED found seven (7) instances in which SoCalGas employees failed to follow and comply with the requirement in SoCalGas' Gas Standards and thus violated General Order 112-F, Reference Title 49 CFR, Part 192, Section 192.605(a).

Within 30 days, please provide your response to each of the violations listed in this letter.

If you have any questions, please contact Mahmoud (Steve) Intably at (213) 576-7016 or email: Mahmoud.intably@cpuc.ca.gov.

Sincerely,



Terence Eng, P.E.  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

cc: [REDACTED], Sempra Energy Utilities  
Mahmoud Intably, SED  
Kan-Wai Tong, SED  
Claudia Almengor, SED