



2024 Gas Safety Plan

Our mission is to build the cleanest, safest, and most innovative energy infrastructure company in America



March 15, 2024



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March 15, 2024

Mr. James Zhang, Utilities Engineer
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue, 2nd Floor
San Francisco, CA 94102

Re: Southern California Gas Company 2024 Gas Safety Plan

Dear Mr. Zhang:

Southern California Gas Company (SoCalGas) is pleased to submit our 2024 Gas Safety Plan (Safety Plan). The Safety Plan summarizes our overarching strategy and approach to safety and affirms SoCalGas' commitment to the safety of our system, customers, employees, contractors, and the communities we serve.

At SoCalGas, we are committed to building the safest energy infrastructure company in America, where safety is foundational to every aspect of our enterprise, in pursuit of a world class safety culture. We know this requires leadership commitment and the commitment of our dedicated employees who work to safely and reliably operate the gas system to serve our customers.

To advance these commitments, SoCalGas works to foster an environment where employees at all levels, work locations, and departments are empowered to continuously enhance the safety of our operations; and encouraged to raise safety concerns including being empowered to "Stop the Job" if someone is ever concerned with the safety implications of a particular condition or activity. We take pride in our work and ownership for safety.

We are committed to continuously enhancing the maturity of our culture and approach to safety. To that end, SoCalGas has implemented a comprehensive safety management system (SMS) consistent with American Petroleum Institute Recommended Practice 1173 (API RP 1173) and is engaged in continuous learning and improvement through Safety Forward,¹ a concerted effort to foster learning and further improve company safety culture and systems.

Additions and updates to the 2024 Gas Safety Plan are summarized in the table attached to this letter and highlighted in yellow below. Please contact Alex Hughes at (213) 671-1344 or AHughes@SoCalGas.com if you have any questions regarding our submission.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cedric L. Williams".

Cedric L. Williams
Chief Safety Officer

¹ SoCalGas has integrated many of its safety learning and improvement efforts into Safety Forward, an internally branded set of actions that have been consolidated to enable better integration, alignment, and impact.

The table below summarizes the portions of the 2023 Gas Safety Plan that are new or have changed, and are included with this submission:

Chapter	New or Changed Element
Chapter 1- Introduction	<ul style="list-style-type: none"> • Updated the Introduction • Deleted Chapter 2 and incorporated the content throughout the plan
Chapter 2 - Plan Development & Implementation	
Chapter 3 - Safety Systems	<ul style="list-style-type: none"> • Updated Transmission Integrity Management Program section • Updated Distribution Integrity Management Program section • Updated Facilities Integrity Management Program section • Updated Pipeline Safety Enhancement Plan Program section
Chapter 4 - Emergency Response	<ul style="list-style-type: none"> • Updated The Gas Emergency Management Preparedness and Response Policy
Chapter 5 - State and Federal Regulations	<ul style="list-style-type: none"> • Updated Figures A and B • Beyond Regulatory Compliance name changed to Beyond State and Federal Regulations
Chapter 6 - Continuing Operations	<ul style="list-style-type: none"> • Updated Risk Management section • Created a Physical Security Section • Created a Cybersecurity Section
Chapter 7 - Emerging Issues	<ul style="list-style-type: none"> • Updated SB 1371 "Natural Gas Leakage Abatement" section • Updated Senate Bill 840 (R.13-02-008) - Biomethane Injection into Common Carrier Gas Pipelines, Renewable Gas Connections and Hydrogen Blending • Updated Enhanced Use of Satellite and Aerial Monitoring for Damage • Updated Pipeline and Hazardous Material Safety Administration • Updated SB 551 Cost Estimate Regulations • Created new section on Long Term Gas Planning OIR
Appendix - Safety Policy Documents	<ul style="list-style-type: none"> • Updated appendix

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SENIOR MANAGEMENT TEAM COMMITMENT TO SAFETY	SoCALGAS: SP.2-SC
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I. INTRODUCTION

SoCalGas defines safety as the presence of controls for known hazards, actions to anticipate and guard against unknown hazards, and the commitment to continuously improve our ability to recognize and mitigate hazards. Safety requires strong ongoing leadership commitment and active engagement and ownership from all employees. SoCalGas focuses on safety through the lenses of public safety,² infrastructure safety,³ employee safety,⁴ and contractor safety.⁵ This safety focus is the foundation of our business and helps to organize effort around our fundamental core safety value. The Company’s tradition of safety spans more than 150 years and is the basis for company programs, policies, procedures, guidelines, and best practices. In other words, safety is what we do, as people and as an organization.

SoCalGas is committed to fostering a culture where leadership sets the example, cultivates psychological safety, and models the behaviors expected of all employees.⁶ SoCalGas’ leadership team is committed to championing people, doing the right thing, shaping the future, and executing on operational excellence. SoCalGas’ safety-focused culture and supporting organizational structure enable the Company to be proactive and accountable for the safe delivery of natural gas and associated business operations.

The Company continuously fosters a work environment where employees and contractors are encouraged to raise gas infrastructure, customer, public, and personal safety concerns and offer suggestions for improvement. SoCalGas Leadership and all levels of management have the authority, accountability, and responsibility to appropriately support, implement, and oversee the elements of safety throughout the organization. This includes all aspects of safety relevant to SoCalGas’ business, including public, infrastructure, employee, and contractor safety. Leaders demonstrate their commitment to enhancing safety performance by communicating and promoting across their organizations the importance of safety, SoCalGas’ safety culture, and responsibility to enhance our approach to safety.

This Gas Safety Plan conveys the safety commitment of SoCalGas’ Senior Management Team, sets forth the safety plans, programs, policies, standards, and procedures that are designed to support that commitment. To align these actions, SoCalGas is also continuing to advance and evolve a comprehensive Safety Management System (SMS) framework that supports and enhances SoCalGas’ longstanding commitment to safety by facilitating the deliberate and intentional integration of our safety systems and processes. The SoCalGas SMS framework is designed to further integrate SoCalGas’ learning and continuous improvement efforts through structured, company-wide processes and systems. This system is embedded in every action and advances the

² Safety systems and processes focused on protection of our customers' and the public (i.e., Emergency Management, Environmental Safety, Customer Data Privacy, Accessibility, and protection of the public from harm caused by our operations or our assets).

³ Safety systems and processes associated with the design, construction, operation, inspection and maintenance of SoCalGas' infrastructure.

⁴ Safety systems and processes focused on the health and safety of our employees. This includes safety policies, programs and training.

⁵ Safety systems and processes focused on the safety and protection of our contractors and subcontractors who provide services to support SoCalGas assets and operations.

⁶ All executives with on-call responsibility are required to receive National Incident Management System (NIMS) Incident Command System (ICS) 100 and 200 certifications and operational executives are required to be Occupational Safety and Health Administration (OSHA) – 10 Hour certified.

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safe and reliable delivery of service to our customers – from employee training to the installation, operation, and maintenance of our utility infrastructure – and touches all areas of safety, including public safety, infrastructure safety, employee safety, and contractor safety. The Gas Safety Plan and SMS Plan are the foundational documents that communicate SoCalGas’ safety commitment. The Gas Safety Plan and SMS Plan detail SoCalGas’ practices to advance and enhance a comprehensive approach to safety through hazard identification, hazard and risk controls and mitigations, continuous learning and improvement, leadership commitment, and employee engagement.

SoCalGas’s approach to safety is built on the company’s value and commitment to continuous improvement, which encourages the endless pursuit of opportunities to learn and improve. Accordingly, both the Gas Safety Plan and SMS Plan are living documents, which evolve and change as SoCalGas refines, changes, and improves its safety culture, practices, policies, and procedures. To advance this continuous learning and improvement approach, SoCalGas is engaged in efforts to further understand, learn, and improve its safety culture and approach to safety through an initiative known as Safety Forward. Safety Forward advances safety through a cross-functional team of executive sponsors and initiative leads who provide leadership to advance understanding, reflection and awareness, build trust, and foster psychological safety.

1. PUBLIC UTILITIES CODE SECTIONS 961, 963, 956.5 AND CPUC DECISION 12-04-010

California Senate Bill 705 was signed into law on October 7, 2011, and codified as California Public Utilities Code sections 961 and 963. Section 961 requires each gas corporation in California to develop a plan for the safe and reliable operation of its gas pipeline facilities and the California Public Utilities Commission (Commission or CPUC) to accept, modify, or reject the plan by year-end 2012. Section 963, among other things, establishes that it is the policy of the State that the Commission and each gas corporation place safety of the public and gas corporation employees as the top priority.

On April 19, 2012, the Commission approved Decision (D.)12-04-010, which amended the scope of the Commission’s Pipeline Safety Rulemaking (R.) 11-02-019 to include complying with the requirements of Public Utilities Code sections 961 and 963. The Commission directed each of the State’s gas corporations to submit a proposed natural gas system operator safety plan, with documentation of the workforce comment process described in the decision, by June 29, 2012.

In addition to Public Utilities Code sections 961 and 963, this Gas Safety Plan addresses the requirements of Assembly Bill 56, chaptered on October 7, 2011, which codified Public Utilities Code section 956.5. Section 956.5 requires operators to review, at least once each calendar year, emergency contingency plans with local fire departments having jurisdiction over the area where intrastate transmission and distribution lines are located.

2. PURPOSE

According to the Commission, “the rationale for developing a gas safety plan is to motivate a gas utility to reflect upon its existing methods and for it to change, to optimize, or to enhance the existing methods... and the lessons learned from the San Bruno incident, as appropriate, to ensure that the gas utility has a prudent plan in place to protect public safety and worker safety.”⁷ The gas system operator safety plans are to convey the “Executive Officer’s” safety performance expectations, policy principles, and goals/objectives for a gas utility’s safety performance.

SoCalGas has designed its Gas Safety Plan to satisfy each of these directives, and furthermore to implement “the policy of the state that the commission and each gas corporation place safety of the public and gas corporation employees as the top priority.”^{5F8}

3. GAS SAFETY PLAN STRUCTURE

Public Utilities Code sections 961 and 963 require that the gas system operator safety plans establish how the utility will achieve certain specified goals, and the Commission has organized these goals into five overall categories: (1) safety systems, (2) emergency response, (3) state and federal regulations, (4) continuing operations, and (5) emerging issues. This Gas Safety Plan follows this organizational structure as outlined by the Commission and is divided into sections corresponding to these five categories, with each section representing a required Gas Safety Plan element or other significant element or aspect of the Gas Safety Plan. The requirements of Section 956.5 are addressed within the category of emergency response.

SoCalGas has numerous safety programs, plans, and procedures in place that address specified infrastructure or areas of company activity. The intent of the Gas Safety Plan is to provide an overview that encompasses all the plans, programs, and policies, as well as affirm SoCalGas’ commitment to safety.

The Appendix provides a listing of the safety program components discussed in the Gas Safety Plan.

4. PROGRAM REVIEW AND MODIFICATIONS

Public Utilities Code section 961 establishes that gas corporations shall periodically review and update their gas system operator safety plans. This Gas Safety Plan shall be reviewed at an annual frequency period not to exceed 15 months. The program owners must provide justification for any deviation from this review schedule.

⁷ D.12-04-010 at 19.

⁸ Pub. Util. Code section 963.

GAS SAFETY PLAN

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All components of this Gas Safety Plan must be reviewed and updated per the schedule below:

Document Type	Review Cycle
Gas Safety Plan	Annually (not to exceed 15 months)
SMS Company Operations Standard	At least every 5 years
Gas Standards	At least every 5 years
Transmission Integrity Management Program	At least annually
O&M	At least annually
Control Room Management	At least annually
Storage Integrity Management Program	Annually (not to exceed 15 months)
Distribution Integrity Management Program	At least every 5 years
Form Instructions	Every 5 years
Environmental	Every 5 years
Information Bulletins	At least annually

If changes are needed, they shall be made as soon as practicable through the Request to Publish⁹ process, and not deferred until the next scheduled review.

⁹ PP01.040 Submitting a Revised Company Operations Standard for Publication.

II. PLAN DEVELOPMENT AND IMPLEMENTATION

1. STATE DIRECTIVES TO SUPPORT WORKFORCE PARTICIPATION

In D.12-04-010, the Commission identified the topic of workforce participation in plan development to meet the requirements of Public Utilities Code section 961(e). This section requires that the Gas Safety Plan achieve the following:

The commission and gas corporation shall provide opportunities for meaningful, substantial, and ongoing participation by the gas corporation workforce in the development and implementation of the plan, with the objective of developing an industry wide culture of safety that will minimize accidents, explosions, fires, and dangerous conditions for the protection of the public and the gas corporation workforce.

To comply with Section 961(e) directives and General Order 112-F Subpart G Section 301, the Commission has explained that natural gas system operators need to take the following actions:

1. The operator must make its safety plan available to its workforce, and provide for comments and suggestions from the workforce;
2. Gas system operators shall retain a log of the comments and suggestions, including the disposition of the comment or suggestion, with a summary of the rationale for the disposition;
3. Gas system operators shall also inform their employees that any employee who perceives a breach of safety requirements may inform the Commission of the breach, and that the Commission will keep the identity of the employee confidential; and
4. Each gas operator shall provide its workforce with the address of the Director of the Commission's Consumer Protection and Enforcement Division and the designation "Safety Breach Notification from Gas System Operator Employee-Confidentiality Requested" to seek confidential treatment.

2. SOCALGAS EMPLOYEE AND CONTRACTOR SAFETY ENGAGEMENT PROCESS

SoCalGas recognizes that all employees are knowledgeable, important internal stakeholders and safety leaders. Commitment to safety is strongly reinforced by the senior management team, and cascades through all levels of the organization. Employee and stakeholder engagement is critical to learning from our employees about challenges and improvement opportunities, and providing clarity to employees, so that policies, goals, objectives, and procedures are understood and can be followed.

Employees play a critical role in SoCalGas' safety and have been an important contributor to developing this Gas Safety Plan. Employees raising concerns to management and making recommendations for safety are necessary elements for continuous improvement as this enables the Company to gather safety-related input from its employees.

GASSAFETY PLAN

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To promote a culture of trust and increase the likelihood of reporting known or potential safety risks, the Company is committed to enabling employee participation in the continuous improvement of this Gas Safety Plan. The Gas Safety Plan is posted on the Company intranet site and is accessible to all employees and is reviewed and updated annually. The intranet site includes a summary of the plan content, a link to the document, hotline phone number and address for direct notification to the CPUC, and an electronic form for submitting pipeline and occupational safety risks and ideas for improvement. One of the main purposes of the site is to provide employees a venue for reporting issues outside of the typical supervisor-reporting relationship. Employees can also make reports anonymously and are encouraged to communicate in whatever manner they are most comfortable.

Company communications have been set up to remind employees of the availability of the Gas Safety Plan, how to provide feedback on the Plan, and the importance of reporting known issues and improvement ideas. The importance of reporting safety risks is also included in employee training course materials.

Employee feedback, suggestions, and recommendations are necessary to mitigate risk and enhance safety through continuous improvement. This is accomplished through multiple platforms and processes to gather and analyze employee safety feedback.¹⁰ These include:

- The Injury & Illness Prevention Program (IIPP) encourages employees to identify risks and elevate them to management.
- Near misses, stop the jobs, and good catches submitted by employees, as well as safety incidents incurred during the week are shared with employee teams at regularly scheduled safety meetings. Employees are encouraged to raise issues or concerns related to their work so these can be addressed and used as learning and continuous improvement opportunities with the broader work group. Employees can submit Stop the Job/Near Miss/Good Catch reports and Safety suggestions directly to their supervisors, in writing, by phone or online.
- Quarterly employee dialogues and WE Lead tours offer opportunities for in-person discussions between frontline employees and SoCalGas executives regarding safety and other concerns.
- Meetings and dialogues sessions where employees and local safety committees meet with the Executive Safety Council (ESC) and the Advisory Safety Council (ASC) provide important means for senior leadership to hear directly from frontline employees on safety issues.
- Employee led safety moments and presentations at the ESC, ASC and other safety meetings provide opportunities to better understand employees' safety priorities and perspectives.
- Learning Teams as well as Event Learnings involve frontline employees in understanding and improving work processes and gain insights directly from those performing work to enhance safety and continuously improve.
- Annual Safety Congresses and District Safety Standdowns across the service territory.
- Quarterly meeting with the CSO, Union Leadership and other Safety Leadership to discuss safety efforts including the review of this Gas Safety Plan.

¹⁰ Concerns are also reported via the Ethics & Compliance Helpline. Safety related issues are flagged for prioritization.

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SoCalGas values employee input and acts with expediency to consider input received. For example, when SoCalGas employees identify hazards such as contractors excavating without properly locating underground utilities or the presence of a hazardous atmosphere or electricity in a work area, they report a “Stop the Job” or “Near Miss”. A Near Miss report is when an individual identifies an incident(s) where no injury, illness or damage occurred but there was the potential for injury, illness, or damage. A Stop the Job report is when someone encounters an unsafe condition or action or is uncertain on how to perform a job and stops work before endangering themselves or others. Additionally, SoCalGas employees report Good Catches. A Good Catch is the report of an observation, event, or situation that has the potential to cause injury, illness, or damage, but did not occur thanks to timely intervention by an engaged employee or the presence of an effective control. The reporting and sharing of these events and observations provide learning opportunities that help prevent incidents and foster organizational awareness and learning. SoCalGas recognizes that learning is key to improvement and incident prevention, and endeavors to identify systemic improvements with attention to culture, management systems, process conditions, and human factors.

When an employee takes the time to submit a near miss, stop the job, or good catch, SoCalGas engages in a systematic and comprehensive review processes. Each report is logged in the Company’s Safety Information Management System (SIMS) for review, follow-up (if necessary) and sharing with employees across the Company. SoCalGas’s objective is to conduct evaluations thoroughly and timely consistent with the Company’s commitment to continuous improvement. Sometimes this means that an issue may require more time to resolve as enhancements are planned and implemented. Suggestions are reviewed to determine how they might reduce risk and improve safety. This helps us go beyond meeting regulatory requirements to proactively implementing effective, industry leading practices in safety.

Contractor Safety Engagement

An additional element of the SMS stakeholder engagement is to promote safety related engagement and dialogues between our contractor partners and the business units within the company. These efforts take the form of job planning, compliance reporting, jobsite inspections and performance data which provide trends and analysis for identifying operational safety concerns in support of continuous improvement. The following platforms allow for contractor safety engagement and dialogues:

- Annual Contractor Safety Congress
- Contractor Performance Response Team
- Contractor Safety Program
- Form #4211 – Contractor Field Safety Observations
- Gas Safety Observations, formerly submitted through SOAR system
- Job Site-Specific Safety Plan (JSSP)
- Quarterly Pipeline Contractor Meetings

3. EXTERNAL STAKEHOLDER ENGAGEMENT

SoCalGas manages engagement with external stakeholders through its Public Awareness Plan.¹¹ The goal of the Public Awareness Plan is to enhance safety through improved public awareness and to comply with Federal Regulations 49 CFR 192.616 and 196.12. SoCalGas supports a more informed

¹¹ PA-1 Public Awareness Plan

PLAN DEVELOPMENT & IMPLEMENTATION	SO CAL GAS: SP.3-SC
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public who will contribute to a reduction in pipeline emergencies and releases. The plan has executive sponsors, who endorse and provide the necessary resources to achieve its goals and objectives.

The primary objectives of the Public Awareness Plan are to:

- Enhance safety through increased public awareness and knowledge;
- Reduce third party damage to pipeline facilities; and
- Provide better understanding of pipeline emergency response.

These objectives are achieved by educating the public on:

- The existence and purpose of pipelines;
- Use of a one-call notification system prior to excavation and other damage prevention activities;
- Possible hazards associated with unintended releases from a pipeline facility;
- Physical indications that such a release may have occurred; and
- Steps that should be taken for safety in the event of a pipeline release and procedures to report such an event.

The plan follows the guidance provided in the American Petroleum Institute Recommended Practice (API RP) 1162 – Public Awareness Programs for Pipeline Operators. Specifically, the plan identifies the audiences to be considered for targeted communications, the frequency of messages, the messages to be delivered to each audience, and the methods and vehicles for delivering the messages. Furthermore, SoCalGas has specific measures to evaluate the effectiveness of our program and materials. It identifies communications for sharing pipeline safety risk information with those residing near the pipelines and defines a mechanism whereby the public can report safety risk issues to SoCalGas. It includes:

- Affected Public
- Excavators
- Public Officials
- First Responders/Emergency Officials

External stakeholders that are not covered by the Public Awareness Plan are the regulatory agencies who oversee SoCalGas in various safety areas, such as pipeline safety, employee safety, and public safety. These include the CPUC, Department of Transportation (DOT)/ Pipeline and Hazardous Materials Safety Administration (PHMSA), Cal OSHA, Environmental Protection Agency (EPA), Underground Safety Board (USB), Air Quality Management District (AQMD) and California Geologic Energy Management Division (CalGEM). SoCalGas engages with these regulatory agencies through its Regulatory Affairs organization, Environmental Services organization, SMS organization, and various other engineering, integrity, and operations organizations.

III. SAFETY SYSTEMS

1. SAFETY SYSTEMS AND CALIFORNIA PUBLIC UTILITIES CODE SECTIONS 961(d)(1) and (d)(2)

In D.12-04-010, the Commission identified the topic of safety systems to meet the requirements in California Public Utilities Code sections 961(d)(1) and (d)(2). These sections require that the Gas Safety Plan achieves the following:

- Identify and minimize hazards and systemic risks in order to minimize accidents, explosions, fires, and dangerous conditions, and protect the public and gas corporation workforce. Section 961(d)(1).
- Identify the safety-related systems that will be deployed to minimize hazards, including adequate documentation of the commission-regulated gas pipeline facility history and capability. Section 961(d)(2).

SoCalGas has a number of plans and programs that identify and minimize hazards and systemic risks in pipeline infrastructure and promote personnel, system, environmental, and public safety. Chapter 5 below, covers SoCalGas' emergency response programs, which identify our public safety systems. These plans and programs are an integral part of our approach to safety including the following:

- Transmission Integrity Management Program (TIMP)
- Distribution Integrity Management Program (DIMP)
- Storage Integrity Management Program (SIMP)
- Facilities Integrity Management Program (FIMP)
- Operation and Maintenance Plan
- Pipeline Safety Enhancement Plan (PSEP)
- Control Room Management Plan
- Gas Safety Enhancement Programs (GSEP)

The pipeline integrity management programs, TIMP and DIMP, were established in accordance with 49 Code of Federal Regulations (CFR) Part 192, Subparts O, P, and A, to address safety-related risks on the natural gas system. Included in these risk assessments are lessons learned from internal and external gas pipeline incidents. Risk assessments are reviewed at least annually, and updated as warranted, using data and information gained from operations and maintenance, inspection and testing, integrity-related work, and incident investigations. SoCalGas also implemented its PSEP to further enhance the safety of its transmission infrastructure. SIMP was established to mitigate safety-related risks associated with gas storage through programmatic risk management to enhance and validate storage well integrity. Consistent with its commitment to continuous improvement and to further enhance safety, the Company developed a FIMP framework to mitigate safety-related risks associated with transmission, distribution, and aboveground storage facilities. The Gas Safety Enhancement Programs continue to be developed and established in response to various safety-related rulemakings from PHMSA (e.g., Gas Transmission Safety Rule [GTSR], Valve Rule).

2. TRANSMISSION INTEGRITY MANAGEMENT PROGRAM

The Transmission Integrity Management Program (TIMP) was developed in 2004 in accordance with the requirements of Subpart O – “Gas Transmission Pipeline Integrity Management” of Part 192 of Title 49 of the CFR and is an ongoing program that is continuously reviewed and improved.

TIMP is designed to provide assessments and integrity improvements on transmission pipelines, as defined by the DOT, in high consequence areas (HCAs) by outlining responsible parties, timelines for each process element, and incorporating lessons learned. Processes are aimed at identifying threats through data gathering and routine testing, assessing material integrity, and determining preventative and mitigative actions for those threats.

As part of TIMP, information concerning the transmission pipeline infrastructure, such as its operating, environmental, and performance history, is integrated into a broad evaluation of the pipeline. This information is analyzed for each pipeline segment and is used to develop specific integrity-related work plans that are applied at recurring intervals no greater than seven years.

The risk evaluations for DOT-Transmission segments in the scope of TIMP are designed to improve safety performance and are conducted per the schedule in TIMP risk assessment requirements. Pursuant to Subpart O, SoCalGas may use several assessment methods to evaluate pipelines in its system, including in-line inspections (ILI), pressure testing, and direct assessment. ILI is SoCalGas’s preferred assessment method because it provides the most comprehensive set of data regarding the condition of the assessed pipeline. Of the total transmission pipelines in the SoCalGas system, approximately 2327 miles (~69%) are evaluated using ILI methods. These pipeline assessments support the safe operation of the transmission system by enhancing the efficiency and effectiveness of risk mitigation and preventative maintenance measures including corrosion control and the damage prevention programs.

SoCalGas implements TIMP in accordance with our written plan: a collection of internal policy documents that detail how the safety and integrity of our transmission pipeline system is managed and improved. The written TIMP plan also outlines procedures and processes to address each required program element and referenced industry standards (e.g., API RP 1173, ASME B31.8S and NACE SP0502-2010).

In response to major pipeline incidents (e.g., San Bruno rupture), the Protecting our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2016 was signed into law on June 22, 2016. This lawmaking strengthened PHMSA’s safety authority and included provisions to drive new regulations focused on enhancing pipeline safety. To date, PHMSA has published three new regulations that have impacted the TIMP:

- The Gas Transmission Safety Rule (GTSR) Part 1 titled “Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments” was issued on October 1, 2019, and took effect on July 1, 2020. In response to the changes of 49 CFR Part 192, Subpart O, SoCalGas enhanced TIMP accordingly. Additionally, under TIMP, SoCalGas has expanded assessments to additional segments located outside High Consequence Area (HCA) in accordance with 49 C.F.R. § 192.710 and developed a Material Properties & Attributes Verification Plan in accordance with 49 C.F.R § 192.607 to support new pipeline analysis requirements.

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- PHMSA also amended 49 C.F.R. Parts 192 and 195 through the “Pipeline Safety: Requirement of Valve Installation and Minimum Rupture Detection Standards” final rule, which was published on April 8, 2022 and took effect on October 5, 2022. A risk analysis for each safety-related condition or incident discovered through the TIMP, which must occur within three months of occurrence, as well as an annual risk analysis not to exceed 15 months, have been added to the TIMP; these analyses evaluate the appropriateness of installing Rupture Mitigation Valves (RMVs) on DOT-T pipeline segments.
- The GTSR Part 2, titled “Safety of Gas Transmission Pipelines: Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, and Other Related Amendments,” was published August 24, 2022, and took effect on May 24, 2023. The TIMP written plan was updated to address the changes to Subpart M (Maintenance) and Subpart O (Gas Transmission Pipeline Integrity Management) that enhance data gathering for risk assessments and strengthen the repair requirements for integrity assessments.

3. DISTRIBUTION INTEGRITY MANAGEMENT PROGRAM

The Distribution Integrity Management Program (DIMP) is designed to sustain a safe and reliable gas supply and delivery system by maintaining gas distribution system integrity. It is an ongoing program developed in accordance with the requirements of Subpart P – “Gas Distribution Pipeline Integrity Management” of Part 192 of Title 49 of the Code of Federal Regulations, which became effective February 12, 2010. The program’s purpose is to improve safety through the identification and reduction of pipeline integrity risks on distribution pipelines. Continuous improvement elements are integrated into the program using data and risk management to drive prioritization of activities.

SoCalGas' DIMP focuses on the continuous identification and evaluation of existing and potential threats using a data-driven and risk-informed approach to develop measures designed to reduce both the likelihood and consequences of pipeline failures. Specifically, SoCalGas continuously improves its system knowledge, evaluates, and ranks risk, implements programs to address risk, measures performance, monitors result, evaluates the effectiveness of risk reducing programs or activities, conducts periodic evaluation, implements improvements, and reports results.

SoCalGas’ DIMP plan requires the integration of data from many sources for analysis, and the resulting program activities based upon that analysis. The written plan and related procedures identify and prescribe activities to enhance safety by minimizing systemic and localized risks to SoCalGas’s distribution system and documenting relevant system information. In 2022, the DIMP teams began the implementation of improvements to the safety-based vintage pipeline replacement activities, addressing specific threats on distribution medium pressure mains, such as corrosion for steel mains and construction defect, material failure/defect, natural cause, prior pinch, and tree root damage for plastic mains. Using a combination of internal SoCalGas datasets and external publicly available data sources, the program is shifting from using relative risk analysis to segment-specific quantitative risk results to inform replacement activities.

SoCalGas’ DIMP is reviewed, at minimum, every five calendar years as part of the continual improvement process, as well as in response to changing conditions or new regulatory requirements.

4. STORAGE INTEGRITY MANAGEMENT PROGRAM

The Storage Integrity Management Program (SIMP) was proposed by SoCalGas in 2014 and approved by the CPUC and established in 2016. SIMP complies with CalGEM regulations as defined in 14 California Code of Regulations (CCR) §1726, PHMSA regulations as defined in 49 CFR § 192.12, as well as applicable industry standards.

The purpose of SIMP is to manage well, reservoir, and surface asset integrity, assess risks and threats, and mitigate potential storage well and reservoir safety and/or integrity issues. SIMP was designed to accomplish this by capturing information on the condition of our storage wells, reservoirs, and surface assets and developing models that assist in prioritizing risk mitigation, which can include activities such as:

- Streamlining data collection, data management, and maintenance of associated records;
- Identifying threats and performing risk assessments;
- Developing and implementing preventative and mitigative measures; and
- Conducting integrity assessments and mitigations.

SIMP identifies potential threats and hazards to well and reservoir integrity; assesses risks based on potential severity and estimated likelihood of occurrence of each threat; identifies the preventive and monitoring processes employed to mitigate the risk associated with each threat; and, specifies a process for periodic review and reassessment of the risk assessment and prevention protocols.

The SIMP written plan is divided into chapters, with each chapter representing a required element or other significant function of SIMP. The SIMP plan focuses on storage wells (and includes other wells that penetrate the storage reservoir) and reservoirs and provides a framework to manage the functional integrity of design, construction, operation, modification, maintenance, monitoring, and documentation practices.

Storage design, construction, operation, and maintenance include activities to support risk management, site security and safety, emergency preparedness, and procedural documentation and training to embed human and organizational competence in the management of storage facilities.

SoCalGas' SIMP is reviewed annually, not to exceed 15 months, as well as in response to changing conditions or new regulatory requirements.

5. FACILITIES INTEGRITY MANAGEMENT PROGRAM

SoCalGas' Facilities Integrity Management Program (FIMP) is based on industry recommended guidelines and practices. The program includes certain piping, vessel and tank mechanical integrity inspections at aboveground natural gas storage facilities, transmission compressor stations and pressure limiting stations, SB 1383 renewable natural gas facilities, and natural gas vehicle fueling stations. Activities included in the program go beyond regulatory requirements and are not duplicative of other existing integrity management programs.

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Through the FIMP, the Company incorporates integrity management principles, continuous improvement and industry best practices to facility equipment to reduce risks and promote safety, sustainability and operational excellence.

6. OPERATION AND MAINTENANCE PLAN

SoCalGas' Operation and Maintenance (O&M) plan is a compendium of over 175 policies designed to comprehensively address the safe operation and maintenance of our facilities pursuant to the requirements of 49 C.F.R. § 192.605 "Procedural manual for operations, maintenance, and emergencies." This O&M plan includes policies that address, but are not limited to:

- Operating, maintaining, and repairing the pipeline and its components;
- Controlling corrosion;
- Availability of construction records, maps, and operating history;
- Start up and shut down of the pipeline;
- Maintenance and operation of compressor stations;
- Operator Qualification;
- Review of procedures to determine effectiveness and adequacy;
- Safety procedures for excavation; and
- Control room management.

The O&M plan is reviewed annually to verify that the included policies and procedures remain in compliance with the requirements of the relevant sections of Title 49 of the Code of Federal Regulations. These policies and procedures are updated throughout the year in response to new information or regulations, technology, or other items that drive improvement.

Individual documents referenced by the O&M plan undergo full functional reviews at least every five years. Training programs are reviewed in the same timeframe as associated gas standards, so employees are aware of and perform tasks safely and according to the current requirements. To help employees remain safe and knowledgeable of critical policies and procedures, including those related to safety, SoCalGas provides annual review training for all operations employees.

The documents referenced by the O&M plan comprehensively address the safe operations and maintenance of our facilities, identify and prescribe activities whose purpose is to minimize risks, and document its history through meeting and documenting code/regulation compliance, promoting safety and operational excellence, and minimizing the potential for and consequences associated with unplanned events such as equipment failure or operator error.

7. PIPELINE SAFETY ENHANCEMENT PLAN

In 2011, the CPUC issued D.11-06-017 in R.11-02-019, which ordered all California natural gas transmission pipeline operators to prepare and file implementation plans to replace or pressure test all transmission pipelines that have not been adequately tested or for which reliable records are not available. These requirements were later codified as Public Utilities Code sections 957 and 958.

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In response, SoCalGas and SDG&E submitted their Pipeline Safety Enhancement Plan (PSEP). PSEP is a systematic effort to test or replace transmission pipelines that do not have sufficient documentation of a pressure test to at least 1.25 times the Maximum Allowable Operating Pressure (MAOP). PSEP employs a risk-based prioritization methodology and includes replacement of pre-1946 pipe that cannot be assessed using in-line inspection tools, and enhancement of valve infrastructure.

The primary objectives of PSEP are to: (1) enhance public safety; (2) comply with Commission directives; (3) minimize customer impacts; and (4) maximize the cost effectiveness of safety investments.

PSEP’s key elements include:

- Criteria (Decision Tree) to determine whether to test or replace transmission pipelines that do not have sufficient documentation of a pressure test to at least 1.25 times the Maximum Allowable Operating Pressure (MAOP)
- A two-phased approach and prioritization of pipelines operated in more populated areas (Phase 1) ahead of pipelines in less populated areas (Phase 2)
- Replacement of pipelines installed prior to 1946 that cannot be assessed using in-line inspection tools, i.e., “non-piggable” pipelines (Phase 1B)
- Interim safety enhancement measures
- Enhancement of valve infrastructure through the retrofit of existing valves and installation of additional remote control and automated shutoff valves.

PSEP also includes measures to enhance the pipeline system beyond those required by the Commission through retrofitting pipelines and valves with existing and emerging technologies to provide advance warning of a potential pipeline failure and decrease the time to identify, investigate, prevent, remediate, or manage the effects of such an event.

8. GAS SAFETY ENHANCEMENT PROGRAMS

In SoCalGas’ TY 2024 GRC, SoCalGas proposed a portfolio of gas safety enhancement programs designed to comply with new PHMSA rulemakings resulting from the PIPES Act of 2011 and successive acts. Current rules that have taken effect and driven incremental safety enhancements include the “Pipeline Safety: Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments,” “Pipeline Safety: Safety of Gas Transmission Pipelines: Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, and Other Related Amendments,” and “Pipeline Safety: Requirement of Valve Installation and Minimum Rupture Detection Standards” final rules.

“Pipeline Safety: Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments” Rulemaking

PHMSA published the final rule on October 1, 2019. With various parts taking effect July 1, 2020 and July 1, 2021, the rule strengthened record-keeping requirements and added entirely new sections to the code, requires operators to reconfirm pipeline maximum allowable operating pressure (MAOP) for pipeline segments without traceable, verifiable, and complete records; establishes an opportunistic material properties and attributes verification procedure; and expands integrity assessment

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requirements beyond segments in high consequence areas. Requirements associated with and/or impacting TIMP are discussed in section IV.2. of this plan. Additionally, SoCalGas proposed an integrated safety enhancement plan (ISEP) in the TY 2024 GRC application that would reconfirm MAOP of pipeline segments not included in the approved PSEP.

“Safety of Gas Transmission Pipelines: Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, and Other Related Amendments” Rulemaking
PHMSA published a final rule on August 24, 2022, which took effect May 24, 2023, with a limited enforcement discretion order extending the effective date of changes associated with various sections to February 24, 2024. The rule added new requirements for pipeline segments in HCAs and non-HCAs that impact TIMP (Section IV.2.) as well as requirements that enhance the safety of transmission pipelines through increased corrosion control, extreme weather event response measures, and expanded management of change activities.

“Amendments to Parts 192 and 195 to require Valve Installation and Minimum Rupture Detection Standards” Rulemaking

PHMSA published a final rule on April 8, 2022, which went into effect on October 5, 2022. The rule requires operators to install rupture mitigation valves (RMVs) on newly constructed or “entirely replaced” transmission pipeline segments with diameters of six inches or greater and perform risk analyses annually to identify RMV installation opportunities. Additionally, the rule requires operators to strengthen incident investigation requirements and establish procedures for rupture identification and response measures, which are discussed in more detail in Section V of this plan.

IV. EMERGENCY RESPONSE

1. EMERGENCY RESPONSE AND CALIFORNIA PUBLIC UTILITIES CODE SECTIONS 961(d)(5), (d)(6) and (d)(8)

In D.12-04-010, the Commission identified the topic of emergency response to meet the requirements of Public Utilities Code sections 961(d)(5), (d)(6) and (d)(8). These sections require the Gas Safety Plan to:

- Provide for appropriate and effective system controls, with respect to both equipment and personnel procedures, to limit the damage from accidents, explosions, fires, and dangerous conditions.” Section 961(d)(5).
- Provide timely response to customer and employee reports of leaks and other hazardous conditions and emergency events, including disconnection, reconnection, and pilot-lighting procedures.” Section 961(d)(6).
- Prepare for, minimize damage from, and respond to, earthquakes and other major events.” Section 961(d)(8).

In addition, the Gas Safety Plan addresses the requirements of Assembly Bill 56, chaptered on October 7, 2011, which codified Public Utilities Code section 956.5 that states:

- Owners and operators of intrastate transmission and distribution lines, at least once each calendar year, shall meet with each local fire department having fire suppression responsibilities in the area where those lines are located to discuss and review contingency plans for emergencies involving the intrastate transmission and distribution lines within the jurisdiction of the local fire department.

2. SOCALGAS' COMPREHENSIVE APPROACH TO EMERGENCY RESPONSE

SoCalGas employs a robust approach to emergency response, continually refining programs, policies, standards, and procedures. These measures aim to promptly address leaks, hazardous conditions, and emergency events like earthquakes, fires, or mudslides, minimizing impacts. SoCalGas' comprehensive emergency response strategy encompasses communication, preparedness, incident response, training, outreach, and mutual assistance, fostering a proactive and coordinated approach to safety.

Communication and Monitoring

SoCalGas uses Emergency Management communications for swift response and awareness to internal and external stakeholders. External tools, such as Data Capable®, enhance incident awareness, providing alerts for events impacting employees, customers, or facilities.

Preparedness and Training

SoCalGas maintains written plans, including the Gas Emergency Management Preparedness and Response Policy, ensuring employees are trained to respond safely and prioritize people and property protection. Business Continuity Plans support operational stability during and after emergencies.

Incident Response

During incidents, SoCalGas follows the Federal Emergency Management Agency (FEMA) Incident Command System (ICS) to facilitate a multi-level emergency response organization. The ICS structure ensures effective communication and cooperation within the company and with external agencies.

Training and Evaluation

Regular emergency preparedness exercises and drills, involving external agencies, validate plans and identify improvement opportunities. The effectiveness of the response is evaluated through continuous improvement surveys or after-action reports.

Communication and Outreach

SoCalGas conducts routine outreach with first responders, educating them on safe responses to natural gas incidents. The company maintains a public awareness program, informing customers, public officials, and excavation-related personnel about recognizing and preventing gas pipeline emergencies.

Mutual Assistance Support

Participation in mutual assistance agreements (MAAs) with utilities, municipalities, and non-profit organizations ensures collaborative emergency response efforts. SoCalGas maintains MAAs with entities like Pacific Gas and Electric Company and the American Gas Association, reinforcing a systematic approach to emergency preparedness.

3. THE GAS EMERGENCY MANAGEMENT PREPAREDNESS AND RESPONSE POLICY

4.

The Gas Emergency Management Preparedness and Response Policy (ER-1) is designed to create a framework for the protection of our employees, contractors, the public, and our system in the event of a major emergency related to gas pipeline operations safety, health, and environmental protection processes.

The ER-1 documents how SoCalGas aligns with the emergency response requirements specified by SMS and complies with the Public Utilities Code sections 961(d)(5), (6) and (8), as well as the emergency response procedures required by 49 C.F.R. §§ 192.613 and 192.615. It documents how the Company prepares and responds to emergencies by using the Plan-Do-Check-Act (PDCA) cycle for continuous improvement of our processes.

This plan covers the following emergency response elements:

- Prevention and Protection
 - Curtailment Process
- Preparedness
 - Policies and Procedures
 - Exercises and Drills
 - Training
 - Business Continuity Planning
 - Facility Emergency Action and Fire Prevention Plan
 - Emergency Food and Water
 - External Stakeholders' Engagement Outreach

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- Response
 - Emergency Management Response Organization
 - Emergency Management Communications
 - Emergency Operations Centers
 - On-Call Responsibilities
 - Watch Desk
 - Employee Reporting Instructions During Natural Disasters or Major Emergencies
 - Mutual Assistance
 - Potential Emergency Threats and Hazardous Conditions
- Recovery
 - After Action reports
 - Post-Event Debriefs
- Enabling Technologies

With PHMSA’s amendment to 49 CFR Part 192 through the “Pipeline Safety: Requirement of Valve Installation and Minimum Rupture Detection Standards” final rule on April 8, 2022, ER-1 has been updated to increase coordination with emergency response agencies to enhance public safety and minimize environmental impacts of pipeline ruptures. Additionally, in alignment with the amendments to 49 CFR § 192.613, ER-1 includes procedures for the following activities following an extreme weather event or natural disaster that has the likelihood of damage to pipeline facilities:

- Consideration of the nature of the extreme weather event, physical characteristics, operating conditions, location, and prior history in determining the scope of initial inspections
- Communicating with the PHMSA Region Director if the inspection cannot commence within 72 hours after the area can be safely accessed
- Remedial actions for the safe operation of the pipeline based on the inspection which includes but is not limited to:
 - (i) Reducing the operating pressure or shutting down the pipeline
 - (ii) Modifying, repairing, or replacing any damaged pipeline facilities
 - (iii) Preventing, mitigating, or eliminating any unsafe conditions in the pipeline right-of-way
 - (iv) Performing additional patrols, surveys, tests, or inspections
 - (v) Implementing emergency response activities with federal, state, or local personnel
 - (vi) Notifying affected communities of the steps that can be taken to support public safety.

V. STATE AND FEDERAL REGULATIONS

1. STATE AND FEDERAL REGULATIONS AND CALIFORNIA PUBLIC UTILITIES CODE SECTIONS 961(c), (d)(7), and (d)(9)

In D.12-04-010, the Commission identified the topic of state and federal regulations to meet the requirements of Public Utilities Code sections 961(c), (d)(7) and (d)(9). These sections require that the Gas Safety Plan achieve the following:

- The plan developed, approved, and implemented pursuant to subdivision (b) shall be consistent with best practices in the gas industry and with federal pipeline safety statutes as set forth in Chapter 601 (commencing with Section 60101) of Subtitle VIII of Title 49 of the United States Code and the regulations adopted by the United States Department of Transportation pursuant to those statutes. Section 961(c).
- Include appropriate protocols for determining maximum allowable operating pressures on relevant pipeline segments, including all necessary documentation affecting the calculation of maximum allowable operating pressures. Section 961(d)(7).
- Meet or exceed the minimum standards for safe design, construction, installation, operation, and maintenance of gas transmission and distribution facilities prescribed by regulations issued by the United States Department of Transportation in Part 192 (commencing with Section 192.1) of Title 49 of the Code of Federal Regulations. Section 961(d)(9).

This chapter describes how SoCalGas safely designs, constructs, installs, operates, and maintains gas transmission and distribution facilities in compliance with these directives.

2. REGULATORY OVERSIGHT

SoCalGas' transmission and distribution pipelines and facilities are operated and maintained primarily pursuant to PHMSA regulations at the federal level, and Commission regulations and requirements at the state level. The Commission is a state partner of PHMSA and is certified by PHMSA for the intrastate regulation, inspection, and enforcement responsibilities of the transportation of natural gas.

California's rules governing the design, construction, testing, operation, and maintenance of gas transmission and distribution piping systems are specified in General Order 112-F.

Title 49 of the Code of Federal Regulations (49 CFR), Parts 191, 192, 193, and 199, which govern the design, construction, testing, operation, and maintenance of Gas Piping Systems are incorporated into General Order 112-F.

SoCalGas' storage wells are operated and maintained primarily pursuant to PHMSA regulations at the federal level, and CalGEM regulations and requirements at the state level. CalGEM is a state partner of PHMSA and is certified (via 60106 Agreement) by PHMSA for inspection responsibilities of federal regulations.

This Gas Safety Plan and related documents remain consistent with General Order 112-F, and the applicable Parts of Title 49 of the Code of Federal Regulations.

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SoCalGas's gas standards, including O&M procedures, are developed to maintain and continuously improve safety, and comply with federal and state pipeline safety regulations. To meet the requirements of new laws, rules, and regulations, SoCalGas' Pipeline Safety & Compliance and Integrity Management & Strategic Planning teams collectively work to monitor and track changes to legislation and regulatory requirements. When new regulations are adopted, the departments coordinate the implementation of new requirements and document them so that policies, standards, practices, and training materials are updated, as appropriate.

SoCalGas also stays current with regulations and requirements by monitoring legislative and regulatory activities and participating in industry associations, such as the American Gas Association (AGA). As an example, some of the past and current activities SoCalGas has initiated from its participation in industry organizations can be seen in Figures A and B, at the end of this chapter.

The Company also updates procedures, standards and audit programs and keeps required documentation (*e.g.*, leak survey records, patrols, cathodic protection reads, meter and regulation inspection forms, test data, and other documents) for a specified time period to demonstrate compliance.

SoCalGas will continue to comply with applicable regulations and requirements with a focus on continuing to reduce the overall system risk through a process of continuous safety enhancements by identifying, evaluating, and reducing pipeline integrity risks for its gas system.

3. COMPLIANCE WITH GENERAL ORDER 112-F

In accordance with General Order 112-F and, by incorporation, 49 CFR Part 192, SoCalGas has implemented and follows policies, procedures, and programs that govern the design, construction, testing, installation, operation, maintenance, and determination of maximum allowable operating pressure for gas transmission and distribution facilities. These policies, procedures, and programs are updated in a timely manner, as appropriate, in response to changes in regulation, safety advisories, and other safety information.

The individual procedures, policies and programs associated with this Section are listed in the Appendix.

These policies, procedures and programs have been developed to promote safety and comply with the code requirements and are summarized as follows:

- 3.1 Design: 49 CFR Part 192, Subparts B, C, and D specify the minimum requirements for material selection and design of pipe and pipeline components. SoCalGas' transmission and distribution pipelines and facilities are designed with approved materials that have sufficient wall thickness and/or adequate protection to withstand anticipated external pressures and loads that will be imposed on the pipe after installation. The pipelines and facilities are also designed with materials of sufficient strength to contain internal pressures plus appropriate design and/or safety factors. Components, including valves, flanges, and fittings meet the minimum prescribed requirements specified in the regulations. The design also includes pressure relief or other protective devices to prevent accidental over-pressurization as further described in the maintenance section. SoCalGas implements defined procurement processes that facilitate materials traceability.

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- 3.2 Construction: 49 CFR Part 192, Subparts E, F, G and J specify the minimum requirements for the construction and testing of transmission and distribution facilities, including the welding and joining of pipe and components as well as the protection of pipe and facilities from hazards such as unstable soil, landslides, and other hazards that may cause the pipe to move or sustain abnormal loads. SoCalGas’ transmission and distribution pipelines and facilities are to be constructed in accordance with these requirements.
- 3.3 Installation: 49 CFR Part 192, Subpart H specifies the minimum requirements for the installation of distribution service lines, service regulators, and customer meters. These requirements include specifications pertaining to the location of this infrastructure, protection from damage, and valve requirements. SoCalGas’s service lines, service regulators, and customer meters are to be installed in accordance with these requirements.
- 3.4 Maintenance: 49 CFR Part 192, Subparts M and I specify the minimum requirements for the maintenance of transmission and distribution pipe facilities along with the associated corrosion protection facilities. Maintenance activities include the patrolling of pipeline, performing leakage surveys, monitoring performance of corrosion protection systems, making repairs, inspection and testing of pressure limiting and regulating equipment, and valve and vault inspection and upkeep. SoCalGas maintains its pipelines and facilities in accordance with these requirements.
- 3.5 Operations: 49 CFR Part 192, Subparts L and K specify the minimum requirements for the operation of transmission and distribution pipeline facilities. Operational activities are included in the O&M plan described in Chapter 4 and included the Emergency Response Plan described in Chapter 5 of this Gas Safety Plan. The operation of the pipeline also includes requirements for a public awareness program, damage prevention program, control room management procedures, odorization of gas, identification of changes in population density along certain transmission lines, and the determination of maximum allowable operating pressure, including requirements for increasing the maximum allowable operating pressure.

4. BEYOND STATE AND FEDERAL REGULATIONS

SoCalGas stays current on emerging issues within the industry through active participation in industry associations to identify continuous improvement opportunities and enhance safety beyond current regulatory requirements. Table 1 identifies a non-exhaustive list of industry groups in which SoCalGas participates.

Table 1: List of Industry Participation

- American Gas Association
- Gas Piping Technology Committee
- Center for Hydrogen Safety
- American National Standards Institute
- The American Petroleum Institute
- American Society of Civil Engineers
- The American Society of Mechanical Engineers technical committees (B31Q, B31.3 B31.8, B31)
- California Accidental Release Prevention (CAL ARP) seismic committee

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- California Regional Common Ground Alliance
- California Utilities Emergency Association
- Common Ground Alliance
- Dig Alert (Southern California one-call)
- The Gas Technology Institute
- Inter-Utility Coordination Committee
- Inter-Utility Working group
- The Association for Materials Protection and Performance
- NYSEARCH – National Gas RD&D
- USA North 811 (Northern California and Nevada one-call)
- Pipeline Association for Public Awareness
- Pipeline Research Council International
- The Western Energy Institute
- Construction Safety Research Alliance

Figure A identifies examples of activities that SoCalGas is in the process of implementing as a result of its participation in industry groups.

Figure A: List of Activities from Industry Group Participation

Current Activities	
Industry Actions	Implementation Type & Responsible Organization
Residential Methane Detection (RMD) pilot program to use SoCalGas' Advanced Meter communications system to provide alarming and other notification when measured methane-in air- concentration levels exceed pre-set acceptable limits at a monitoring site.	In progress Gas Engineering/Customer Services
Research, Develop and Demonstrate technologies leveraging aircraft systems (manned and unmanned), to conduct various types of Pipeline/Facility inspections and/or surveys to improve safety in remote or difficult-to-access pipeline segments or as incremental activities.	On-going Research and Materials Strategic Programs
Mature material manufacturer assessments by enhancing the methodology and centralizing the process behind manufacturer selection to promote consistency, improve material traceability, and reduce risk.	In Progress Gas Engineering – Material Quality Management
Mature the TIMP Direct Examination process to produce results compatible with an Engineering Critical Analysis approach to defect assessment.	In Progress Integrity Management
Edison Electric Institute's (EEI) development of a Safety Classification and Learning (SCL) Model to track SIF Potential and promote learning and improvement	On-going Safety Management Systems

Figure B identifies examples of activities that SoCalGas has implemented as a result of its participation in industry groups. Most of the activities are processes that have been initiated and implemented as a regular and routine element of SoCalGas' operations. Activities within the past five years, noted as "adopted" have been incorporated as part of the normal course of business.

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Figure B

Industry Actions	Implementation Type & Responsible Organization
Develop technology to electronically track leak survey routes and map the location of found leaks with spatial coordinates and link other data such as level of leakage found.	Adopted Gas Operations - Policies Tools & Strategies
Implement a system that links geographic information systems (GIS) with locate and mark data from KorTerra (a ticket management software) to rank the highest risk Underground Service Alert (USA) tickets for prioritized routing and monitoring.	Adopted Gas Operations - Policies Tools & Strategies
Review and revise as necessary established construction procedures to provide for appropriate (risk-based) oversight of contractor installed pipeline facilities.	Adopted Gas Operation Services
Under DIMP, evaluate risk associated with trenchless pipeline techniques and implement initiatives to mitigate risks.	Adopted Sewer Lateral Inspection Program Gas Operations Support
Under DIMP, identify distribution assets where increased leak surveys may be appropriate.	Adopted Pipeline Integrity
Extend Operator Qualification program to include tasks related to new main and service line construction.	Adopted Pipeline Safety & Compliance
Expand excess flow valve (EFV) installation beyond single family residential homes.	Adopted Pipeline Integrity
Incorporate an Incident Command System (ICS) type of structure into emergency response protocols.	Adopted Emergency Services
Extend transmission integrity management principles outside of High Consequence Areas (HCAs) using a risk-based approach.	Adopted Pipeline Integrity
Implement applicable portions of AGA's technical guidance documents: 1) Oversight of new construction tasks to ensure quality; 2) Ways to improve engagement between operators and excavators.	Adopted Gas Operations Services
Begin risk-based evaluation on the use of Automatic Shutoff Valves (ASVs), Remote Controlled Valves (RCVs) or equivalent technology on transmission block valves in HCAs.	Adopted Gas Engineering
Implement appropriate meter set protection practices identified through the Best Practices Program.	Adopted Gas Infrastructure Protection Program (GIPP) Gas Operations Support
Upgrades for aging equipment used to locate underground pipelines and facilities have been purchased and deployed. The standardized training has been developed and completed.	Adopted Gas Operations Services
Utilize algorithms in SoCalGas' Advanced Meter program that detect subtle changes in consumption and leaks on the customer side of the meter. These algorithms also find water leaks from excessive natural gas consumption on water heaters.	Adopted Advanced Meter

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Industry Actions	Implementation Type & Responsible Organization
Under DIMP Distribution Risk Evaluation and Monitoring System (DREAMS), increased construction oversight to ensure safety, quality, and monitor construction progress of medium pressure main and service replacements.	Adopted DIMP DREAMS
Install Optical Pipeline Monitoring on all new or replacement pipelines one mile or more in length, at least 12 inches in diameter and intended to operate at or above 20 percent of their specified minimum yield strength. Will allow for remote monitoring of potential leaks in real time, identification of non-native ground movements and 3rd party intrusions.	Adopted Gas Engineering
Utilize in-the-ditch Non-Destructive Examination methodology to determine pipe attributes by performing tests on the external surface of the pipe.	Adopted Integrity Management
Implement Threat Identification process for identification and prioritization of pipe segments where Stress Corrosion Cracking (SCC) may be a threat.	Adopted Integrity Management & Strategic Planning
Computer program to evaluate surface loads on buried pipes was validated by PRCI field tests. Program is used to evaluate temporary and permanent loads on our buried pipes.	Adopted Gas Engineering
Computer program to evaluate lifting pipe along a trench to ensure the pipe is not being overstressed during installation.	Adopted (for special cases) Gas Engineering
Computer Program to evaluate piping stresses at river crossings.	Adopted Gas Engineering

VI. CONTINUING OPERATIONS

1. CONTINUING OPERATIONS AND CALIFORNIA PUBLIC UTILITIES CODE SECTION 963 (b)(3) AND SECTIONS 961 (d)(3), (d)(4), and (d)(10)

In D.12-04-010, the Commission identified the topic of “continuing operations” to meet the requirements in Public Utilities sections 963(b)(3) and 961 (d)(3), (d)(4), and (d)(10). These sections require that SoCalGas’ Gas Safety Plan achieve the following:

- It is the policy of the state that the commission and each gas corporation place safety of the public and gas corporation employees as the top priority. The commission shall take all reasonable and appropriate actions necessary to carry out the safety priority policy of this paragraph consistent with the principle of just and reasonable cost-based rates. Section 963(b)(3).
- Provide adequate storage and transportation capacity to reliably and safely deliver gas to all customers consistent with rules authorized by the commission governing core and noncore reliability and curtailment, including provisions for expansion, replacement, preventive maintenance, and reactive maintenance and repair of its commission-regulated gas pipeline facility. Section 961(d)(3).
- Provide for effective patrol and inspection of the commission-regulated gas pipeline facility to detect leaks and other compromised facility conditions and to effect timely repairs. Section 961(d)(4).
- Ensure an adequately sized, qualified, and properly trained gas corporation workforce to carry out the plan. Section 961(d)(10).

2. SAFE AND RELIABLE STORAGE AND TRANSPORTATION

SoCalGas has designed its integrated gas transportation, distribution, and storage system to meet design standards established by the Commission for gas service including to core and noncore customers. The SoCalGas gas system is designed to provide continuous service to core customers during a 1-in-35-year peak day condition, under which noncore transportation service is curtailed. The system is also designed to provide for continuous forecasted noncore transportation and core service under a 1-in-10-year cold day condition, and to maintain adequate backbone capacity to meet the average day in a 1-in-10 year cold-and-dry year. SoCalGas utilizes detailed hydraulic models of the gas system to evaluate its capacity to meet these design standards and identify improvements as necessary. The conditions for the design standards are expected to occur during the peak winter operating season when core customers’ gas usage is the greatest.

Information about transportation and storage capacities are available through the ENVOY electronic bulletin board. The ENVOY bulletin board is located at: socialgas-envoy.com.

In accordance with SoCalGas’ policies, the Gas Transmission Planning and Distribution Region Engineering departments continuously monitor customer demand on SoCalGas’ transmission and distribution system using both actual customer service requests and a long-term demand forecast. Any changes in customer demand are evaluated against the appropriate CPUC-mandated design standards for service to assess that adequate capacity is available. Depending upon the customer class, SoCalGas has a variety of Commission-approved means to address capacity deficiencies. When a deficiency is identified, possible solutions are considered, evaluated, and implemented according to SoCalGas rules and tariffs.

Additionally, in D.06-09-039, the Commission established a common design standard for SoCalGas and Pacific Gas and Electric Company (PG&E) for “slack capacity,” or reserve margin, on their backbone transmission systems. Per this decision, the Gas Transmission Planning Department shall “plan and maintain intrastate natural gas backbone transmission systems sufficient to serve all system demand on an average day in a one-in-ten cold and dry-hydroelectric year.” D.06-09-039 at 184 (Ordering Paragraph No. 1). In July 2022, CPUC Decision D. 22-01-007 established a Citation Program, requiring gas corporations to maintain adequate backbone capacity to meet the average day in a 1-in-10 cold and dry year standard established by D.06-09-039, or incur daily penalties of \$50,000/day for each day beyond nine months that it remains out of compliance, and subject to an increase of \$75,000/day penalties beyond twelve months that it remains out of compliance.

SoCalGas shall expand storage capacity and operational capability (inventory, injection and withdrawal) in the event the SoCalGas/SDG&E core customer reliability is in jeopardy without such an expansion.

Finally, SoCalGas continuously monitors its system to meet current customer demand. Per SoCalGas Rule 41, Utility System Operation, the mission of the Utility Gas System Operator is to maintain system reliability and integrity. This rule provides information on the responsibilities performed to maintain system reliability by each of the SoCalGas departments that contribute to the System Operator function.

SoCalGas will continue to perform operating and maintenance activities and make capital investments to support the Company's pipeline system, maintain and enhance the operational efficiency and responsiveness of storage operations, and comply with applicable regulatory and environmental regulations.

3. SOCALGAS WORKFORCE SIZE, TRAINING AND QUALIFICATIONS

3.1. Workforce Size

SoCalGas takes into consideration multiple factors in determining appropriate staffing levels to preserve the safety and reliability of its gas delivery system and public safety. In connection with this process, SoCalGas engages in several resource planning activities, including workforce planning, knowledge transfer, training, and succession planning.

Annual baseline employee staffing levels are determined during the annual business planning process and a combination of workforce and contracts are maintained with qualified service providers to complete work and address variability in work demand throughout the year. As part of the planning process, management evaluates projected workforce against safety, compliance, maintenance, and construction obligations. If the projected workforce cannot fulfill these obligations, local managers raise the needs, and they are addressed as part of the resource allocation and funding process. This process is repeated throughout the year as resource vacancies occur or as work levels significantly change, offering local managers an immediate path to authorization to fill the vacancies or add to staff. Resource allocation decisions consider both employee levels and contractor availability. Verification of appropriate staffing levels is determined by monitoring specified performance metrics and workloads.

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Employees in safety-sensitive positions are trained to handle emergencies. Employees are cross trained as appropriate, in various assignments, to perform a variety of duties that allow a flexible workforce to meet sudden changes in work demands. The Company assesses its workforce requirements on an ongoing basis (such as through an annual planning exercise and as needed throughout the year) to develop hiring and development plans and budgets to supplement or replenish the workforce as necessary to sustain the safety and reliability of its system.

The Company uses contractors, as necessary and in compliance with collective bargaining agreements, so that sufficient overall resources are deployed to address maintenance and construction. SoCalGas requires that contractors undergo training and meet specific compliance requirements to perform work on Company pipelines and facilities, including compliance with Operator Qualification. Contractors are monitored so that they perform their responsibilities consistent with Company standards and contract requirements. Contractors are further monitored through ISNetwork, a third-party contractor compliance company.

3.2. Field Operations Training

Field Operations Training classes are often a new employee's first glimpse into the Company's culture and approach to safety. It is Field Operations Training's mission to instill the idea that safety is the responsibility of every individual, and that all employees are empowered to Stop the Job anytime safety is in question. Further, Field Operations Training has the opportunity to influence employees at multiple stages of their career as they return to training to prepare for new roles and additional responsibility. Field Operations Training's goal is to produce a skilled, competent, and safety-focused workforce. Employees are given an opportunity to ask questions and provide feedback about training effectiveness.

Training courses are delivered to each function/classification in all field job progressions and vary from two to seven weeks for entry-level positions, and up to 12 weeks for progression positions. Courses are taught utilizing various training methods and are foundationally rooted in our Gas Standards. The courses are delivered by instructors from a centralized Field Operations Training and Development team. These instructors convey consistent safety messages and confirm the understanding of the classroom training by observing employees performing simulated field situations at SoCalGas' training complex or centers in Pico Rivera, Bakersfield, and soon to include San Bernardino.

Integrated in the training courses are the Operator Qualification tasks, as required by 49 CFR Part 192. The documentation for these qualifications and records are closely monitored and employees are re-trained, re-qualified or updated whenever significant changes occur in a task regulation or when they are required to re-qualify as prescribed by PHMSA.

Emergency response is covered within the training courses for classifications that have any activities or functions in this area. The classifications include Lead Construction Technician, Industrial Services Technician, Commercial Services Technician, Energy Technician Residential and Distribution, Construction Technician, Pipeline Technician, and Dispatch Specialist. Employees are required to annually review policies and procedures so that they understand emergency response guidelines and procedures, including when to contact Corporate Security to address certain threats.

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SoCalGas has a training curriculum that tests employees’ skills in identifying and repairing gas leaks and other real-life emergency situations through simulation exercises. These exercises are also included in first responder training. In addition, the Company implemented a technical skills training course to help employees new to management become more effective in addressing these situations as supervisors and managers.

As part of the Company’s continuing education effort, a hands-on training course for supervisors on high-pressure gas pipeline work has been developed and is being taught to new supervisors.

SoCalGas participates in industry forums, validates that training activities are consistent with regulatory requirements, and identifies when new training opportunities exist.

Training course materials are updated on a regular basis. Root causes of safety incidents, findings and near miss investigations are a significant part of course discussion/instruction in order to sustain and improve overall employee, system, and public safety.

In addition to field operations training, supervisors receive extensive training to support safety operations and a healthy safety culture. All new supervisors are required to complete the New Supervisor Onboarding Program, a holistic 5-month training curriculum that includes the Safety Essentials for Supervisors course. Additionally, in 2024, front line field supervisors will begin expanding leadership development efforts through Leadership Catalyst, a one-day leadership experience highlighting the leader’s role in building a healthy safety culture. Leadership Catalyst is designed to equip participants with tools to cultivate a high-performance team environment, build safety capacity, and advance a learning mindset.

3.3. Qualification of Pipeline Personnel

The purpose of Operator Qualification is to assure safety in the transport of hazardous gases through our pipelines. Gas pipeline operators are required to have a written Operator Qualification program to establish compliance policies for the DOT Operator Qualification Program as required by Subpart N – “Qualification of Pipeline Personnel” of Part 192 of Title 49 of the CFR to qualify employees and contractors performing DOT-covered tasks. The Company’s Operator Qualification Program applies to individuals who perform covered tasks, whether they are employed by the Company, a contractor, a sub-contractor or any other entity performing covered tasks on behalf of the Company. Such programs are reviewed by the Operator Qualification department prior to performing work on pipelines or pipeline facilities.

The Operator Qualification Program requires that employees are trained, initially qualified and subsequently re-qualified every three or five years depending on the task. SoCalGas’s training frequency conforms to these requirements and the results of the evaluations are recorded -- demonstrating employees’ knowledge of and skills and abilities in accordance with the job requirements, and that they are qualified to perform the required tasks. Employees that do not pass are not authorized to perform that activity until they have been successfully re-trained and re-qualified. Furthermore, employees are evaluated at any time due to cause, such as significant errors during operations activities on pipeline assets. Essentially, any employee who performs a covered task—ranging from meter readers to customer services, distribution, storage, and transmission field personnel—must be qualified to perform Operator Qualification tasks.

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The Operator Qualification Program also requires that contractors’ knowledge, training and skills conform to the job requirements and that they are qualified to perform the required tasks. An external vendor, who is one of the nation’s leaders in regulatory compliance for Operator Qualification, provides training, testing, Operator Qualification, and record retention for our pipeline contractors.

4. DRUG AND ALCOHOL MISUSE PREVENTION PLAN

The purpose of the Drug and Alcohol Misuse Prevention Plan is to prevent accidents that could result from the use of controlled substances and alcohol, thereby reducing fatalities, injuries, and property damage. The Company’s plan and policies are designed to promote safety, accomplish the above accident prevention objective, and comply with state and federal law.

If performing DOT-covered functions, employees undergo pre-employment drug and alcohol testing and are entered into the random drug testing program. Contractors are also required to have a Drug and Alcohol Misuse Prevention Program or work with a third-party to enforce the program in compliance with DOT regulations, specifically, 49 CFR Parts 40, 199 and/or 382. Contractors are required to make sure their employees have a negative pre-employment test on file before their first performance of safety-sensitive functions and are entered in the contractor’s random testing pool.

5. RISK MANAGEMENT

SoCalGas has developed an integrated risk management process based on the internationally recognized risk management standard, International Organization for Standardization (ISO) 31000. Key objectives of the Enterprise Risk Management (ERM) process are to inform Leadership about enterprise risks and their evolution, to connect risk management activities with decisional procedures and company strategy, and to assure risk management activities are effectively incorporated into the Company’s objectives, processes, and activities.

In pursuit of these objectives, SoCalGas has adopted a six-step process to identify, analyze, prioritize, manage and monitor risks. Prioritization is based on an assessment of overall risk impact, probability of occurrence, and level of control. SoCalGas has a dedicated Risk Management organization to facilitate implementation of this process by employees throughout the Company.



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The effectiveness of risk management depends on its integration into the governance of the organization, including decision-making. This requires strong leadership commitment and support from stakeholders. SoCalGas’ ERM framework incorporates a formalized governance structure to integrate and align risk management practices across the enterprise and drive appropriate communication and collaboration across the enterprise—so that both leadership and subject matter expert input is incorporated into the framework on a continuous basis and so that outputs of the risk management process inform decision-making and resource planning across the enterprise.

SoCalGas organizations (Risk Management, SMS, Operations, and others) collaborate to discuss risk management, mitigation progress and effectiveness, the SMS policies and framework, and the continuous improvement of the SMS and ERM frameworks to promote effective safety and risk management practices across the enterprise. The SMS Plan leverages the Company’s risk management framework to establish priorities and objectives and focus SMS resources. Further, the Risk Management and SMS organizations partner on key risk management initiatives to enhance employee, contractor, customer, public, and infrastructure safety. SoCalGas continues to enhance its SMS by further integrating risk, safety, and asset management activities.

SoCalGas has an Enterprise Asset Management (EAM) program, that aligns asset data to build capabilities through advanced technologies and analytics to increase the knowledge and accountability of asset owners through a more robust and comprehensive operating model. This operating model will support a risk-informed value framework to operationalize data-driven long-range operations strategy on all assets across the enterprise. EAM is intended to improve safety, integrity, transparency, and availability of asset records by integrating asset data for advanced analytics within an asset investment planning tool.

SoCalGas has implemented a technology solution for data-driven, risk-informed asset investment planning (AIP). The AIP program progression focuses on building the technology to support a selected group of asset types with the aim of broadening the program to cover enterprise-wide assets. The program follows a maturity model to improve asset data ingestion, data quality and consistency on project valuation processes.

In addition to AIP, SoCalGas’s EAM organization is in the process of building an integrated Data Foundation and Governance program to consolidate asset information in a common data lake. These efforts have allowed for automated, streamlined processes around data collection, and increased the usability and quality of pipeline data. As the program advances, these data sets can then be utilized as inputs into the AIP tool for improved data driven asset level decisions.

EAM will aim to apply a broader range of factors beyond safety and provide a holistic view to asset lifecycle planning and generate data-driven end- to-end asset plans. Starting with Transmission and Distribution assets, SoCalGas’ EAM efforts will aim to integrate additional health indices into analytics and decision-making processes to further expand current asset plans and allow for long-range asset planning across the enterprise.

6. Physical Security

As a result of continued security threats and the evolving sophistication of adversary attacks, the physical security program is regularly assessed to validate strategic direction and improve alignment with current industry best practices. As a key partner, Corporate Security works collaboratively with the SoCalGas Safety program to mitigate potential physical threats and maintain a safe work environment. The physical security is designed to protect personnel and physical assets. Corporate

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Security supports the SoCalGas mission by assisting in the management of physical security risks, enabling risk informed decisions, and proactively adapting to evolving threats and changing business needs. Corporate Security is responsible for the development and management of physical security programs and policies, including physical security controls, security assessments, investigations, and workplace violence mitigation.

Key responsibilities include:

- **Investigations** - Corporate Security Agents investigate hundreds of incidents each year, including burglary, theft, vandalism, suspicious activity, and workplace violence.
- **Access Management** - Corporate Security manages access control and badging for SDG&E and SoCalGas including close to 5,000 electronically controlled access points.
- **Regulatory Compliance** – Corporate Security supports compliance with physical security regulations, standards, and guidelines affecting gas and electric critical infrastructure.
- **Emergency Response** – Corporate Security representatives are first responders for security matters.
- **Facility Monitoring** – The Corporate Security Operations Center (CSOC) monitors company facilities and alarm events to detect and respond to security threats, helping to ensure the safety of employees and assets. Using advanced technology, the CSOC identifies suspicious activity, enabling prompt risk assessment and mitigation.
- **Contract Guard Services** - Oversight of more than 150 guards at SDG&E and SoCalGas facilities.
- **Security Training** - Several training opportunities are offered to employees and external entities focusing on physical security awareness, active shooter, travel safety, situational awareness, and others.
- **Security Reviews & Vulnerability Assessments** – Corporate Security Agents perform site security reviews to identify security vulnerabilities and recommend mitigations.
- **Risk & Intelligence Analysis** – The Risk & Intelligence Program anticipates, identifies, and assesses threats and provides actionable strategic and tactical intelligence to mitigate and reduce risk.
- **Law Enforcement Liaison** – Corporate Security maintains close working relationships with international, federal, state, and local public safety and intelligence agencies to assist with investigations, emergency planning and response, and to receive information regarding security threats.
- Assessments and improvements occur through participation in security events, including detailed discussions and site-specific tabletop exercises, GridEx, the American Gas Association, and the US Department of Homeland Security’s Transportation Security Administration. Under closely supervised conditions, these discussions and simulations identify opportunities for improvement that have been prioritized for mediation as part of a continuous improvement strategy for risk mitigation.

7. Cybersecurity

At the Southern California Gas Company (SoCalGas) and SDG&E (the Companies), we recognize the paramount importance of cybersecurity. Our mission is to provide safe and reliable delivery of electric and gas services to our customers, including critical infrastructure providers within our Southern California service territory. This encompasses financial services, telecommunication providers, and other utilities. Our service area spans millions of people, major cities, bustling ports, critical military bases, and numerous defense contractors and small businesses.

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The Cybersecurity department is responsible for cybersecurity risk management of the information and operational technologies for the Companies.

The Cybersecurity organization’s services are dedicated to safeguarding and enhancing the Company’s security stance in an evolving landscape of heightened threat capabilities. Our efforts contribute to technological advancements and improvements across the business while effectively mitigating the likelihood and impact of cybersecurity incidents. We achieve this balance by managing costs and applying risk management priorities. Furthermore, our department fosters enterprise-wide cybersecurity capabilities so that all users can execute their functions securely, reliably, and with safety awareness.

The Cybersecurity program includes the following areas: Cybersecurity Operations, Governance & Risk Management; Cyber Threat Intelligence & Vulnerability Management; Incident Response; Cybersecurity Program Office; Cybersecurity Engineering and Consulting; and Security Awareness.

The cybersecurity processes are largely designed and assessed based on the National Institute of Standards and Technology Cybersecurity Framework and the DOE’s Cybersecurity Capability Maturity Model standards. While our processes are not designed to specifically meet any such technical standards, specifications, or requirements, we use these standards as a guide to help us identify, assess, and manage cybersecurity risks relevant to our business. Additionally, the Companies comply with applicable laws and regulations both at the state and federal level.

VII. EMERGING ISSUES

1. EMERGING ISSUES AND CALIFORNIA PUBLIC UTILITIES CODE § 961 (d)(11)

In D.12-04-010, the Commission identified the topic of emerging issues to meet the requirements Public Utilities section 961(d)(11). This section requires that the Gas Safety Plan includes any additional matter that the commission determines should be included in the plan.

2. SOCALGAS MONITORING OF EMERGING ISSUES

SoCalGas stays current on emerging issues within the industry through active participation in industry associations, review of PHMSA advisory bulletins, and open communication with legislative, regulatory groups as well as news and trade publications. Chapter 6 of this Gas Safety Plan identifies on-going safety enhancement actions and SoCalGas’ targeted date of implementation.

3. COLLABORATION WITH REGULATORY AGENCIES

SoCalGas will continue to work in collaboration with the Commission and other regulatory authorities and stay abreast of industry best practices, to address those emerging issues that are not yet covered by this Gas Safety Plan.

- Safety Culture OIR
- Senate Bill 1371 “Natural Gas Leakage Abatement”
- Energy Resiliency
- Enhanced Use of Satellite and Aerial Monitoring for Damage Assessments
- Optical Pipeline Monitoring System for Pipeline Damage Prevention and Leak Detection
- Renewable Gas Connections, and Hydrogen Blending
- Proposed modifications to PHMSA Regulations
- Proposed revisions to CalGEM Regulations
- Professional Engineering oversight policy resulting from Columbia Gas Merrimack Valley Incident
- Long-term Gas Planning OIR

Safety Culture OIR

In October of 2021, the CPUC issued Order Instituting Rulemaking 21-10-001 (OIR) to develop and adopt a safety culture assessment framework and identify the structure, elements, and process necessary to drive each regulated investor-owned electric and natural gas utility and gas storage operator to establish and continuously improve their organization-wide safety culture. Accordingly, this OIR provides guidance on the form and content of the safety culture assessments for regulated electric and natural gas investor-owned utilities (IOU) and gas storage operators, provides a venue for a review of organizational safety culture as an organization, and will determine a process for ongoing review and refinement of their safety culture assessments in future years and implementation of related changes and improvements. SoCalGas continues to participate and collaborate with the CPUC and stakeholders to foster advancements in each IOU’s safety culture.

Senate Bill 1371 “Natural Gas Leakage Abatement”

Senate Bill (SB) 1371 requires the adoption of rules and procedures to reduce methane emission from Commission-regulated natural gas pipeline facilities consistent with Public Utilities Code section 961(d) and 49 CFR section 192.703(c). SoCalGas’ 2022 Leak Abatement Compliance Plan and accompanying Advice Letter were approved by the Commission, in June 2023, authorizing the implementation of the activities for each best practice, outlined in the Compliance Plan, for execution through 2024.

SoCalGas continues to improve and evolve its approach to leak abatement and is an industry leader in the development of new methods and use of new technologies that enable the Company to reduce natural gas emissions. Some of these include:

- Improvement of the accuracy of emissions estimating and reporting;
- Development of Company-specific emissions factors;
- Use of infrared cameras to check for leaks after new pipelines are installed;
- Use of special optical cable that detects methane leaks and third-party damage to pipelines;
- Use of infrared “point” sensors that can detect leaks before they can be smelled by people;
- Use of aerial platforms, such as helicopters and drones, equipped with advanced emission detection technologies to spot emissions from above;
- Incorporation of algorithms that use our Advanced Meter system to identify unusual levels of natural gas consumption that indicate a leak at customers’ homes or businesses; and
- Capture of natural gas released during pipeline replacement or safety maintenance and testing, allowing for gas to be saved for later use while eliminating emissions that would otherwise occur.

As reported in 2022, based on the data collected in 2021, SoCalGas reduced its methane emissions by 37% from 2015 levels. This surpasses the State’s 2025 compliance requirement of 20% reduction four years earlier than mandated. Since initiating the Leak Abatement Program, SoCalGas has successfully mitigated more than 26,000 non-hazardous leaks and will continue to address these leaks in a timely manner upon their detection.

Energy Resiliency

Energy Resilience addresses the risk to natural gas infrastructure and the natural gas system from both climate change related events and the need to transition natural gas infrastructure to a carbon neutral state, while continuing to provide safe and reliable service and energy resiliency to Southern California.

Energy interdependence and climate-related events increase the need for energy resiliency. Natural gas infrastructure and natural gas system risks resulting from climate change related events can be event driven (acute) or longer-term shifts (chronic) in climate patterns. These risks include but are not limited to direct damage to assets and indirect impacts from supply chain disruption. Organizations may also be impacted by water availability, sourcing, and quality; extreme temperature changes affecting organizations’ premises (land erosion), operations, supply chain, transport needs, and employee safety.

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Transitioning the existing gas infrastructure and delivery system to achieve carbon neutrality will require physical changes to the natural gas system as well as technological innovation. This will require significant investment to maintain the safety, reliability and resilience of existing infrastructure, while simultaneously investing in new technology and retrofitting existing infrastructure to accommodate alternative energy sources.

Several safety initiatives are underway at SoCalGas to address both the direct impacts to gas infrastructure caused by climate change (including drought, wildfires, and mudslides) and the challenge of maintaining the safety, reliability and resilience of existing infrastructure as the State’s energy system decarbonizes. SoCalGas utilizes its Advanced Meter network to support emergency services during catastrophic events such as mudslides, wildfires, and earthquakes, as well as to proactively detect leaks downstream of the meter and protect core customers. SoCalGas has used meter response and meter throughput data to identify possible impacted areas during an event. The utility emergency response team was also able to use this information to partner with first responders to support search-and-rescue activities.

SoCalGas continues to conduct research to understand possible impacts to its system during extreme events such as the recent wildfires in California or the hurricanes and floods in other parts of the country to better identify potential vulnerabilities and opportunities to enhance resiliency for the natural gas infrastructure. In addition, SoCalGas has initiated the process of performing a climate change vulnerability assessment consistent with the Commission’s directives in the Climate Change Adaptation Order Instituting Rulemaking (OIR). The vulnerability assessment for the Climate Change Adaptation OIR focuses on climate risk, specifically temperature, sea-level, wildfire, precipitation, and cascading impacts, to utility operations, services, and assets.

Enhanced Use of Satellite and Aerial Monitoring for Damage Assessments

Throughout the year SoCalGas uses its satellite monitoring program to provide before-and-after images of areas impacted by wildfire. These images, paired with internal Geographic Information System (GIS) data and infrastructure maps, help identify potential impacted infrastructure due to the winter/rain season.

SoCalGas has also implemented the use of Unmanned Aerial Vehicles (UAVs, aka drones) that provide high-definition aerial imagery and three-dimensional topographic modeling to support damage assessments in these types of incidents.

Enhanced Use of Aerial Technologies for Leak Survey and Emissions Detection

SoCalGas uses state-of-the-art methane detection technologies from both manned and unmanned (drone) aerial platforms to facilitate leak survey and to detect methane emissions in operating environments that pose safety hazards to employees and locations where ground-based access is limited or constrained. The Aviation Services department oversees aviation-related activities and compliance with FAA safety regulations and local ordinances governing use of drones.

Optical Pipeline Monitoring System for Pipeline Damage Prevention and Leak Detection

SoCalGas installed Optical Pipeline Monitoring System (OPM) to enhance and support safety by helping to identify potential leaks, ground subsidence, and help prevent third party dig-ins by detecting vibration from encroachments. The pilot system has been installed in the San Joaquin Valley and at certain creek crossing locations in Santa Barbara County. SoCalGas will continue to

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install optics and expand on this program as construction projects that meet certain requirements are developed.

Senate Bill 840 (R.13-02-008) - Biomethane Injection into Common Carrier Gas Pipelines, Renewable Gas Connections and Hydrogen Blending

SoCalGas supports increasing interconnections to the gas system from renewable gas sources. SoCalGas has been an active and committed partner in advancing recent CPUC filings and legislative initiatives that allow biogas from various sources and within specific gas quality thresholds to connect to its gas infrastructure.

SoCalGas has prepared its system and standards for renewable natural gas (RNG) and is now accepting the production of RNG at the four SB 1383 Dairy Farm pilots in the San Joaquin Valley. These Dairy Farm pilots are an investment in reducing GHG emissions in California by capturing methane that, historically, would be released into the atmosphere. Additionally, SoCalGas has interconnected four more Dairy Farm producers to its gas infrastructure since the completion of SB1383 Dairy Farm pilot sites totaling eight dairy farm producer sites that are operational.

SoCalGas is also on the forefront of exploring various methods of introducing hydrogen blending into its gas system while maintaining safety and reliability. SoCalGas' tradition of safety spans more than 150 years, transcending into the application of hydrogen blending and the basis for company programs, policies, procedures, guidelines, and best practices. SoCalGas is an active member of the Center for Hydrogen Safety (CHS), a global non-profit dedicated to promoting hydrogen safety and best practices. SoCalGas's involvement consists of chairing the hydrogen-natural gas blending working group within CHS, whose efforts include developing best safety practices of blending for industry. SoCalGas's safety efforts for its hydrogen blending demonstration projects involves initiating, implementing, and completing protocols such as providing hydrogen safety education for personnel directly or indirectly associated with the projects and developing any necessary emergency response plans. Furthermore, safety assessments are conducted along with testing, leak surveys and methane/hydrogen monitoring. Mitigation measures are also incorporated throughout the process and are very effective in safe-guarding hydrogen-blending projects.

Efforts will continue to focus on research and development and demonstration projects to fully understand hydrogen blends in a natural gas pipeline system for the development of a Hydrogen Injection Standard, as requested by the CPUC as part of the Biomethane OIR-Phase 4 Ruling. On September 8, 2022, SDG&E, SoCalGas and Southwest Gas submitted a Joint Application to Establish Hydrogen Blending Projects. This Application proposes the creation of live hydrogen blending demonstration projects by each utility. The projects would consist of blending hydrogen in (1) isolated polyethylene plastic, and (2) isolated mixed material (steel and plastic) distribution systems within each Applicants' respective service territories. Subsequent to the filing of this application, the CPUC issued D.22-12-057 directing SoCalGas, San Diego Gas and Electric, Southwest Gas, and Pacific Gas and Electric to file an application within two (2) years proposing hydrogen blending pilot projects or amending an existing application to incorporate requirements of the decision.¹² Therefore, all four gas-IOUs will be filing an amended application in Q1 of 2024 that will (1) propose an additional hydrogen blending demonstration project from 0.1% to 5% hydrogen by volume in an open system in SoCalGas' service territory, (2) propose an additional hydrogen blending demonstration in a transmission system test loop in PG&E's service territory,

¹² D-22-12-057, OP7

and (3) highlight the stakeholder engagement activities required by D.22-12-057. This amended application will also consist of hydrogen blending demonstrations in (1) isolated polyethylene plastic, and (2) isolated mixed material (steel and plastic) distribution systems within SoCalGas’s, SDG&E’s, and Southwest Gas’ respective territories. The proposed hydrogen blending demonstration projects, if approved, will generate crucial information and knowledge with the ultimate goal of informing the development of a safe hydrogen injection standard for the state. In addition to the development of the hydrogen injection standard, SoCalGas will review and update our standards, procedures and specifications for operational readiness in preparation for the introduction of hydrogen blending in our system.

Pipeline and Hazardous Material Safety Administration (PHMSA) Regulations

As significant and new federal safety regulations develop, SoCalGas continues to provide input to assist in effective implementation and desired outcomes that affirms SoCalGas’ commitment to safety and implementing SMS. In conjunction with these new PHMSA regulations, SoCalGas has requested authorization to establish the Gas Safety Enhancement Programs Balancing Account (GSEPBA) to record incremental, substantial, and non-speculative costs imposed by amendments by PHMSA to the CFR.

These new regulations are focused on improving pipeline safety and integrity throughout the U.S and primarily driven by the “Protecting our Infrastructure of Pipelines Enhancing Safety” (PIPES) Act: Reauthorization Bill. On December 27, 2020, the President signed into law the PIPES Act of 2020. The PIPES Act includes several significant enhancements intended to advance PHMSA’s programs addressing public safety and the environment. Some of these enhancements include:

- Updates to PHMSA’s leak detection and repair and class location change regulations to enhance public safety while minimizing methane emissions
- Increased funding to federal and state pipeline safety regulatory agencies and new PHMSA workforce development requirements
- Requirements for operator updates to DIMP plans, emergency response plans, and O&M plans to address over-pressurization and incident response
- Modernized safety regulations covering LNG export facilities and authorization for a new National Center of Excellence for LNG Safety
- Strengthened safety regulations covering local gas distribution systems
- Initiation of a leak detection and repair program requirement
- New grant funding for emergency responders, public safety advocates, and community groups
- Requires Final Rule for Pipeline Safety Gas Transmission and Gathering Pipelines to be issued within 90 days of enactment
- New regulations for idled natural or other gas transmission and hazardous liquid pipelines

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Examples of significant new and upcoming rulemakings include:

“Leak Detection and Repair” Rulemaking

The “Pipeline Safety: Gas Pipeline Leak Detection and Repair” Notice of Proposed Rule Making (NPRM) was issued by PHMSA on May 5, 2023. In response to the PIPES Act of 2020 and in support of the Biden-Harris Administration’s U.S. Methane Emissions Reduction Action Plan, the proposed regulatory amendments in the Gas Pipeline Leak Detection and Repair Rule are intended to reduce both intentional and unintentional greenhouse gas emissions. Operators must develop an advanced leak detection program (ALDP) with a list of leak detection technologies and practices re-evaluated on a periodic basis. This includes leak grading and repair criteria, increased leakage survey and patrolling frequency, failure investigation requirements, and design, configuration, and maintenance requirements to eliminate leaks and minimize releases of gas. Additional regulatory revisions emphasize public safety and environmental safety from all hazards.

PHMSA anticipates publishing the final rule by March 2024, with the rule taking effect six months later.

“Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives” Rulemaking

The “Pipeline Safety: Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives” NPRM was issued by PHMSA on August 24, 2023. PHMSA is proposing regulatory amendments that will require operators of gas distribution pipelines to update their DIMP; emergency response plans; operations and maintenance manuals, including the expansion of MOC to the distribution system and associated activities, as well as the introduction of traceable, verifiable, and complete record-keeping for distribution pipeline systems; and other safety practices.

These proposals implement provisions of the Leonel Rondon Pipeline Safety Act—part of the PIPES Act of 2020—and a National Transportation Safety Board (NTSB) recommendation directed toward preventing catastrophic incidents resulting from over-pressurization of low-pressure gas distribution systems similar to that which occurred on a gas distribution pipeline system in Merrimack Valley on September 13, 2018.

PHMSA anticipates publishing the final rule in May 2024, with the rule taking effect 12 months later.

“Pipeline Safety: Class Location Change” Rulemaking

PHMSA anticipates publishing the “Pipeline Safety: Class Location Change” final rule in December of 2024 to add an alternative set of requirements operators may use when implementing integrity management principles where the class location of a pipeline segment has changed from a Class 1 location to a Class 3 location.

- Operators would be required to notify PHMSA if they use integrity management activities to manage pipeline segments that have changed from a Class 1 to a Class 3 location.
- The alternative set of requirements would apply only to those pipeline segments that have changed class location following the effective date of the rulemaking.
- A Class 1 to Class 3 location segment would be defined as a High Consequence Area segment and subject to 49 CFR Part 192, Subpart O.

“Pipeline Operational Status” Rulemaking

PHMSA will issue a NPRM addressing risk-based regulations for idled pipe including requirements for allowing idled pipelines to resume operations.

“Carbon Dioxide and Hazardous Liquid Pipelines” Rulemaking

PHMSA will issue a NPRM addressing regulations for the transportation of carbon dioxide pipeline in a gaseous state. PHMSA will consider whether applying the minimum safety standards of 49 C.F.R., Part 195, which apply to the transportation of carbon dioxide in the liquid state, will ensure safety.

California Geologic Energy Management Division (CalGEM) Regulations

In the last year, CalGEM did not enact any new regulations impacting underground storage. However, there are a number of rulemakings that have been initiated as described below:

SB 463 Chemical Inventory and Root Cause Analysis Regulations

The Chemical Inventory and Root Cause Analysis pre-rulemaking regulations initiated in 2021 are currently in draft form. The regulations address the Senate Bill 463 (Stern, 2019) requirement that the operator of a gas storage well provide a complete chemical inventory of the materials, of any phase, that may be emitted from the gas storage well in the event of a reportable leak. In addition, these regulations identify specific mitigation activities, including cathodic protection, well-specific well control plans, and the reporting of off-normal occurrences. CalGEM has yet to start the formal rulemaking process and anticipates it will take another year or more before final rules are in effect.

Public Health Regulations

This regulation updates public health and safety protections for communities near oil and gas production operations. This process began in response to a November 2019 directive by Governor Gavin Newsom and has resulted in a preliminary draft rule. It is unknown if this rulemaking will apply to Underground Storage fields. The formal rulemaking schedule has not been announced at this time.

SB 1137 Health Protection Zones

CalGEM submitted emergency rulemaking action to the Office of Administrative Law on December 28, 2022, to address the Senate Bill 1137 (Gonzalez, 2022) requirement that prohibits the issuance of well permits and the construction and operation of new oil and gas production facilities within a health protection zone of 3,200 feet from a sensitive receptor. In addition, the bill establishes strict engineering controls to be implemented by existing operations within the health protection zone. The regulatory language excludes underground gas storage wells and attendant production facilities from compliance with the requirements related to Health Protection Zones. The rulemaking process was monitored to confirm that the exemption language related to underground storage operations was maintained and more clearly defined. The new statutory provisions, authorized under Article 4.6 of PUC §3288, that allows CalGEM to adopt emergency regulations became effective on January 1, 2023. CalGEM’s SB1137 First Emergency Implementation Regulations became effective on January 6, 2023. However, opponents initiated a referendum challenge to the bill. As of February 3, 2023, the implementation of SB 1137’s statutory provisions are stayed, by operation of law, until the referendum challenge has been resolved by a vote of the electorate. As a result, CalGEM’s SB 1137 First Emergency Implementation Regulations are also suspended while the SB 1137 statutory provisions remain stayed.

SB 551 Cost Estimate Regulations

The Cost Estimate Regulations rulemaking process was initiated in August 2023 and proposed regulations are currently in draft form. The proposed regulations would implement statutory reporting requirements to better understand the full costs associated with end-of-life remediation of an operator’s assets. This regulation will require operators to submit a report of total estimated costs related to plugging and abandoning wells and decommissioning attendant facilities, including any needed site remediation. Operators must use CalGEM established criteria for their cost estimates. The initial report could be due as early as January 1, 2025, or later by July 1, 2026. The 45-day public comment period ended on October 4, 2023. The applicability to Underground Storage fields is unknown at this time.

Professional Engineering Oversight Policy

On November 14, 2018, the National Transportation Safety Board (NTSB) issued its accident investigation findings for the September 2018 Columbia Gas natural gas pipeline accident in Merrimack Valley, Massachusetts. Their report included a recommendation ([P-19-16](#)) to thirty-one States (including California) to eliminate the public utility exemption for Professional Engineer (PE) review and approval of natural gas facility designs. The report states in part, “The seal of a P.E. should be required on all public utility engineering plans to reduce the likelihood of accidents...”. The NTSB also made a safety recommendation to Columbia Gas stating, “revise the engineering plan and constructability review process to ensure accuracy, completeness, and correctness, and that the documents or plans be sealed by a professional engineer.”

The State of California maintains exemptions regarding PE approval for public utility and industrial work. The Business and Professions Code, Section 6704(a), provides who may use engineer titles, “In order to safeguard life, health, property, and public welfare, no person shall practice civil, electrical, or mechanical engineering unless appropriately licensed or specifically exempt from licensure under this chapter, and only persons licensed under this chapter shall be entitled to take and use the titles consulting engineer, professional engineer, or registered engineer...”. As a result of the incident, NTSB issued a safety recommendation in their report to “eliminate the professional engineer licensure exemption for public utility work and require a professional engineer’s seal on public utility engineering drawings.”

In the spirit of continuous improvement to enhance and promote engineering design safety and oversight, the Company adopted the NTSB recommendations to implement PE seal/stamping requirements that consider project complexity and risk. In that light, the Company developed a framework that was implemented on January 1, 2021, to identify critical facility issued-for-construction (IFC) designs that must be reviewed, approved, and sealed by a licensed PE. A new Company Operations Standard was published on June 1, 2021 providing the guidelines, requirements, and criteria for the application of the PE’s approval signature and seal on qualifying engineering documents that are prepared by either internal Company engineers or external engineering contractors. A Professional Engineering Governance intranet site is available to support impacted organizations and employees.

Long-term Gas Planning OIR

The Order Instituting Rulemaking to Establish Policies, Processes, and Rules to Ensure Safe and Reliable Gas Systems in California and Perform Long-Term Gas System Planning (Long-term Gas System Planning OIR, R.20-01-007), was opened in January 2020 to “respond to past and prospective events that together will require changes to certain policies, processes, and rules that govern the natural gas utilities in California. With respect to past events, several operational issues in Southern California prompt the Commission to reconsider the reliability and compliance standards for gas public utilities. Over the next 25 years, state and municipal laws concerning greenhouse gas emissions will result in the replacement of gas-fueled technologies and, in turn, reduce the demand for natural gas.”¹³

On February 22, 2024, a Draft Scoping Memo for Phase 3 of this proceeding was issued for comment. Based on information to date, Phase 3 of this proceeding may include development of policies that can impact and inform SoCalGas’ Gas Safety Plan, including policies related to “What are the medium- to long-term options for reducing gas system costs and avoiding stranded assets while maintaining reliability, safety, and gas commodity cost containment?”¹⁴ as well as workforce issues and other considerations for long-term system planning.

¹³ Order Instituting Rulemaking R. 20-01-007 - <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M325/K641/325641802.PDF>.

¹⁴ February 22, 2024, Assigned Commissioner’s Ruling Scheduling Phase 3 Prehearing Conference and Providing Joint Agency Staff Gas Transition White Paper and Draft Phase 3 Scope and Schedule for Party Comment at 20 - <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M526/K067/526067752.PDF>.

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GAS SAFETY PLAN APPENDIX

1.1. In Decision D.12-04-010, the Commission stated gas operator safety plans “may reference existing components or include Exhibits or Attachments that cross-reference to other existing utility documentation[.]” *Id.* at 19. SoCalGas has numerous existing safety programs, plans, and procedures in place that address specified infrastructure or areas of company activity. This Gas Safety Plan provides an overview that encompasses the plans, programs, and policies referenced in this document and affirm SoCalGas’ commitment to safety. The following matrix is a guide to the documents making up these plans, programs, and policies. Documents have been identified by their policy number and title and cross-referenced to the Gas Safety Plan chapter.

Policy Document – Safety Plan Matrix

Gas Safety Plan Chapter					
Policy	Title	4	5	6	7
01.010-COM	Emergency Incidents/Local Instructions		X		
10.010-COM	BRP - Dispatch/ARSO		X		
10.020-COM	BRP - Customer Services, Distribution, and Meter & Regulation		X		
100.0152	Self-Audit Requirements - Gas Measurement (Distribution, Transmission & Storage)	X		X	X
104.0001	Environmental Training	X			
104.0017	Pipeline Liquids - Field Handling	X			
104.0030	Hazardous Waste Shipping		X		
104.0040	Hazardous Material Shipping		X		
104.0095	Hydrogen Sulfide Lead Acetate Tape Analyzer Maintenance				X
104.0150	Proposition 65 Compliance		X		X
104.02	Notification Requirements for Release/Spill Events		X		
104.0210	Industrial Waste Discharge to Sanitary Sewer				X
104.0220	Hydrostatic Test Water Management			X	X
104.06	Respiratory Protection Program	X		X	X
104.071	Draeger Pac® 7000 Personal Gas Monitor				X
106.0063	Fire Extinguishing Equipment				X
107.0004	Material Evaluation and Implementation	X			
107.0293	RMLD - Remote Methane Leak Detector				X
107.0296	Sensit G2 Multigas Detector and SMART-CAL Equipment Operations and Maintenance Procedures				X
140.04	Condition/Location of Meter Installations and Report of Inaccessible/Removed Meters	X		X	
142.0060	Service Policy				X
142.0065	Meter Set - Meter Turn-On	X		X	
142.0075	Closing Meters - Methods and Procedures	X		X	
142.01	Order Completion Schedule and Priority Scheduling	X	X	X	
142.0146	Fumigation Close and Back-On Orders				X

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Gas Safety Plan Chapter					
Policy	Title	4	5	6	7
142.02	Leak Investigation - Customer Service	X		X	
142.0275	Back Flow Protection - Regulators and Check Valves			X	X
142.1189	Premise Access				X
142.5660	Purging Gas Meters and Customer Houelines	X		X	X
151.0010	Environmental Inspections, Search Warrants, and Internal Notifications	X			
166.0015	Fire Prevention and Protection - Transmission and Storage	X		X	
166.0025	Prevention of Accidental Ignition of Natural Gas	X	X	X	
166.0032	Low-Voltage Electrical Safety Program				X
166.0076	Working in Flammable Atmospheres	X		X	
166.0077	Confined Space Operations	X			
166.09	Heat Illness Prevention for Outdoor Work				X
167.0100	Operator Qualification Program	X		X	X
167.0125	Self-Audit Guidelines - Pipeline Integrity Program	X			
167.0200	Data Gathering and Integration	X	X	X	X
167.0203	Threat Identification	X			
167.0204	Risk Assessment of High Consequence Areas	X			
167.0207	TIMP Risk Algorithm	X			
167.0208	Baseline and Reassessment Plan	X			
167.0209	External Corrosion Direct Assessment Procedure	X			
167.0210	In-Line Inspection Procedure	X	X		
167.0211	Bellhole Inspection Requirements	X		X	X
167.0212	Casing Wax Fill	X		X	X
167.0214	Preventive and Mitigative Measures	X			X
167.0215	Continual Evaluation	X			X
167.0216	Stress Corrosion Cracking Direct Assessment Procedure	X			
167.0217	Supplemental Data Determination	X			
167.0218	Pipeline Cleaning Standard	X			
167.0220	In-Line Inspection Surveys Standard	X			
167.0224	Dry Gas - Internal Corrosion Direct Assessment	X			
167.0229	Internal Corrosion Management Plan	X		X	X
167.0230	Internal Corrosion Design and Construction Considerations	X		X	X
167.0232	Field Sampling and Analysis of Liquids and Solids/Sludge	X			
167.0233	Corrosion Coupon Installation and Removal	X		X	X
167.0235	Immediate Repair Conditions - Transmission Pipelines	X	X	X	X
167.0236	Scheduling Remediation	X			
167.0240	Assessment of Pipeline Integrity Using Guided Wave UT	X			
167.0245	Global Positioning System (GPS) Process	X			
167.0246	GPS Control Survey	X			
167.0247	Aboveground Survey Plan	X			X

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Gas Safety Plan Chapter					
Policy	Title	4	5	6	7
167.0248	Alternating Current Attenuation Survey	X			X
167.0249	Close Interval Survey	X			X
167.0250	Voltage Gradient Survey	X			
167.0251	Soil Resistivity Survey	X			
167.0252	Inspection of Cased Pipe	X			
167.0260	Fiber Optic Cable Installation for Pipeline Monitoring	X			X
167.04	Contractor Safety Program	X			X
167.09	SMS Company Operations Standard	X	X	X	X
167.15	Hot Work Permit Program	X			
167.30	Lead and Metals in Surface Coatings: Hazard Compliance Program		X		
180.0005	Steel Pipe - Selection Requirements	X		X	X
180.0010	Steel Butt-Weld Fittings - Selection Guide	X		X	X
180.0015	Wedding Bands, Reinforcing Sleeves and Canopies – Selection Guide	X		X	X
180.0020	Flanges - Selection, Torque and Installation Requirements	X		X	X
180.0030	Branch Connection, Steel - Selection Guide	X		X	X
180.0035	Leak Repair Clamps and Sleeves - Selection Guide	X		X	
180.0040	Pressure Control Fittings - Selection Guide	X			X
180.0045	PE Reinforcing Sleeves - Selection Guide, Application and Installation	X		X	
180.005	Steel Pipe Yield, Design Properties and Design Pressure Tables	X			
180.0050	Control Piping			X	X
180.0085	Valve Usage and Selection Guide	X		X	X
180.0090	Valve Casing Assembly - Selection Guide				X
180.0100	Prefabricated Vaults - Design and Selection Guide	X		X	X
182.0010	Request for Pipeline Engineering Assistance	X		X	X
182.0020	Electrical Facilities in Hazardous Areas			X	X
182.0040	Changing Maximum Allowable Operating Pressure and Maximum Operating Pressure	X		X	X
182.005	Service Pipe and Excess Flow Valve Sizing				X
182.0050	MAOP Evaluation of Corroded Pipe	X		X	X
182.0052	Welding Inspector Operator Qualification	X		X	X
182.0055	Identification of Steel Pipe and Butt Weld Fittings	X		X	X
182.0060	Service Risers	X			
182.0070	Angles and Bends in Steel Piping			X	X
182.0080	Casing Assemblies - Steel Carrier Pipe	X		X	X
182.0085	Pipe End Closures				X
182.0087	Inspection of Pipeline Cable-Suspension Bridges	X		X	
182.0090	Designs for Pipelines in Bridges	X		X	X
182.0093	Wear Pads and Bands for Steel Gas Piping	X		X	X

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Gas Safety Plan Chapter					
Policy	Title	4	5	6	7
182.0125	Steel Service Design - 60 psig or less				X
182.0130	Steel Service Design 61-1000 PSIG			X	X
182.0140	Casing Assemblies - Plastic Carrier Pipe	X		X	X
182.0148	Casing Assemblies - Plastic Carrier Pipe	X		X	X
182.0150	Polyethylene (PE) Service Selection Guide	X		X	X
182.0160	Purging Pipelines and Components	X		X	
182.0161	Purging Operations – Minimum Distance Between Purging-Stack and Ignition Sources	X		X	X
182.0162	Purging and Locking Service Risers	X		X	X
182.0165	Tap Requirements	X		X	X
182.0170	Strength Testing - High Pressure Pipelines and Facilities	X		X	X
182.0185	Pressure Terminology and Establishment of Pressure Levels for Piping	X		X	X
182.0190	Class Location - Determination and Changes	X		X	X
182.0200	Design Factors for Steel Piping Systems	X		X	X
183.0030	Contact with Fire and Police Departments and Public Agencies	X	X	X	
183.01	Shutdown Procedures and Isolation Area Establishment for Distribution Pipeline Facilities	X	X	X	X
183.0100	Emergency Incident Notifying	X	X		
183.0110	Field Procedure - Emergency Incidents Transmission	X	X	X	X
183.0120	Emergency Outage Procedure	X	X	X	
183.0130	Materials and Supplies for Emergency Situations	X	X	X	
183.0160	Dispatch Office - Message Center Reports	X	X	X	X
183.03	Field Guidelines - Emergency Incident Distribution / Customer Service	X	X	X	X
183.05	Message Center Reporting (MCR)	X	X	X	
183.06	Region Reports of Safety-Related Pipeline Conditions	X	X	X	X
183.07	Pipeline Incident Reports to CPUC and PHMSA; National Transportation Safety Board (NTSB) Accident Investigation	X	X		X
183.08	Pipeline Safety Reports and Notifications to CPUC and DOT	X	X	X	X
184.001	Planning of Distribution Pipeline Projects	X			
184.0016	Main Construction Project Routing	X			
184.0031	Pressure Monitoring of Distribution Systems	X		X	X
184.0035	Regulator Station Design and Planning			X	X
184.0050	General Construction Requirements for Distribution Mains			X	X
184.0055	Hand Backfill and Compaction Method			X	X
184.0060	General Construction Requirements for Distribution Service Lines	X		X	X
184.0075	Evaluation and Disposition of Inactive Services	X		X	
184.0080	Abandonment of Gas Services and Gas Light Tap Assemblies	X		X	X
184.0085	Abandonment or Inactivation of Gas Distribution Pipelines	X		X	X

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Policy	Title	4	5	6	7	
184.0090	Valve Selection and Installation - Services			X	X	
184.0100	Inserting PE Pipe - Service Replacement			X	X	
184.0105	Polyethylene (PE) Pipe Inserted – Main in Metal Casing			X	X	
184.011	Notification of Excavation and Construction Activities – Assembly Bill Number 1937/ PUC Code 955.5			X	X	
184.0110	Inserting PE Pipe - Service Riser Adapter			X	X	
184.0115	Tapping/ Stopping PE Fittings	X				
184.0120	Service Risers for Polyethylene (PE) Installations			X	X	
184.0121	Service Riser Integrity Observations and/or Inspection	X				
184.0123	Composite Coating Repair for Anodeless Risers	X				
184.0124	Coring for Mini Riser Vault (MRV) Installation	X				
184.0125	Tracer Wire Installation for Polyethylene (PE) Pipe Installations			X	X	
184.0130	Polyethylene Heater - Temperature Measurement and Adjustment	X			X	
184.0150	Leak Testing of Distribution Piping with MAOP <= 60 PSIG	X		X	X	
184.0170	Trenchless Construction Methods	X		X	X	
184.0175	Company and Company-Contractor Damage Prevention Excavation Requirements	X				
184.0200	Underground Service Alert and Temporary Marking	X		X		
184.0225	Leak Repair Methods for Steel Distribution Pipelines	X				
184.0235	Polyethylene (PE) Pipe Repair	X		X	X	
184.0240	Polyethylene (PE) Tapping Tee and Service Saddle Repair				X	
184.0245	Leak Investigation - Distribution		X		X	
184.0250	Halt Tool - Gas Emergency Leak Clamp		X			
184.0275	Inspection Schedule - Regulator Station, Power Generating Plant Regulation Equipment Requirements	X		X		
184.03	Replacement Criteria for Distribution Mains and Services	X		X		
184.0300	Squeezing and Reopening Mains and Services	X				
184.0335	Steel Pipe Squeezers 6" through 12"	X	X		X	
184.0340	Squeezing Polyethylene (PE) Pipe - 1/2" Through 8"	X				
184.0355	Pressure Control Machines - 2" Through 12"	X		X		
184.0360	Pressure Control - Fittings 2" and Under Pressure Limitations and Related Equipment	X		X		
184.0366	Pressure Control: Drilling Operations For DH-5 Drilling Machine	X		X		
184.0368	Pressure Control - TD Williamson Unit1200					X
184.0370	Pressure Control: Drilling Operations For D-5 Drilling Machine	X		X		
184.04	Supply Line Identification and Records	X		X		
184.0415	Pressure Control - Bottom Outlet Stoppers - 4" Through 12"	X		X		
184.0443	Pressure Control - 2", 3" and 4" Top Half Fitting					X
184.0447	Handling and Storage of Polyethylene (PE) Material	X		X		
184.0450	Pressure Control - Completion Plugs 3/4" - 1-1/4"	X		X		

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Policy	Title	4	5	6	7
184.0451	Pressure Control: Completion Machine H-17045	X		X	
184.0463	Pressure Control: H-17145 Completion Machine	X		X	
184.0480	Pressure Control - Completion Plugs	X		X	
184.0575	Pressure Control: Stop Standard 2" Service Tee With D-5 Machine	X		X	
184.0585	Remove 1" Street Ell from a Service Clamp - Install a 1" Threaded Both Ends (TBE) Nipple in Clamp	X		X	
184.0590	Pressure Control Qualification Requirements	X		X	
184.06	Gas-Handling and Pressure Control	X		X	
184.09	Prevention of Excavation Damage to Company Facilities	X		X	X
184.12	Inspection of Pipelines on Bridges and Spans	X		X	X
184.16	Valve Inspection and Maintenance - Distribution	X		X	X
184.17	Temporary LNG Facility	X			X
185.0001	Meter Locations	X		X	X
185.0005	Curb Meter Box - Installation Requirements				X
185.0007	Curb Meter Box Installation			X	X
185.0008	Meter Guard - Installation Requirements	X		X	X
185.0010	MSA Standard Designs and Selection Chart				X
185.02	Pressure Regulation - Residential and Commercial	X		X	X
185.0228	Meter Set Assembly Inspections	X		X	X
185.0287	Over-Pressure/Under-Pressure Protection - Maintenance, Installation and Settings	X		X	X
185.0300	MSA - Installing, Rebuilding and Inspections	X		X	X
185.0310	Inspection Schedules - Measurement and Regulation Equipment, PLC's, Recording Gauges, Vaults and Filters	X		X	X
185.0559	Terms and Definitions				
185.0560	Pressure Regulation Overpressure Protection				X
186.0002	Design and Application of Cathodic Protection	X		X	X
186.0005	Cathodic Protection - Mixed Piping System	X		X	X
186.0015	Condition Assessment of Unprotected Distribution Steel Piping	X		X	
186.0035	Criteria for Cathodic Protection	X		X	X
186.0036	100mV Polarization Criteria	X		X	X
186.0040	Magnesium Anodes for Corrosion Control	X		X	X
186.005	Cathodic Protection - Instruments and Testing Equipment	X			
186.0052	Copper Sulfate Electrode	X			
186.006	Selection and Installation of Rectifiers and Impressed Current Anodes	X			X
186.0070	Insulating MSA's	X		X	
186.0075	Electrical Test Stations & Bond Assembly	X		X	X
186.0090	Corrosion Control of Underground Hazardous Substance Storage Tanks				X

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Gas Safety Plan Chapter					
Policy	Title	4	5	6	7
186.0100	Approved Protective Coatings for Below Ground Corrosion Control	X		X	X
186.0102	Field Application of Fusion Bonded Epoxy to Joints and Field Repair of Fusion Bonded Epoxy Coating	X		X	X
186.0103	External Surface Preparation and Field Applied Coatings for Buried Pipelines	X		X	X
186.0104	Surface Preparation and Coating for Above Ground Piping and Steel Components	X			X
186.0108	External Surface Preparation and Coating Application for Steel Tanks and Vessels (New & Refurbished)	X		X	
186.0109	Internal Coating of Tanks, Vessels, & Drip Legs	X		X	
186.0110	Field Tape Wrapping Requirements	X		X	X
186.0111	Field Application of Grease Coating	X		X	X
186.0117	External Surface Preparation and Shop-Applied Coating for High Corrosion Service Areas	X		X	X
186.0120	Interference - Stray Electrical Current	X		X	X
186.0121	Requirements for Installing Gas Pipelines in or adjacent to Sloping Terrain	X		X	X
186.0135	Operation and Maintenance of Cathodic Protection Facilities	X		X	X
186.0170	Record Keeping - Corrosion Control	X		X	X
186.0180	Cathodic Protection Test Orders - Monitoring Isolated Facilities	X		X	
186.0190	Induced High Voltage Alternating Current (HVAC) on Pipelines				X
186.02	Cathodic Protection - Inspection of Exposed Pipe	X		X	X
186.06	Cathodic Protection - Electrical Isolation	X		X	X
186.07	Hot Line Insulating Sleeves	X		X	
186.09	Cathodic Protection - Casings	X		X	X
186.224	Well Production Casing – Determination and Need for Cathodic Protection				X
186.225	Design and Application of Cathodic Protection – Well Production Casings				X
186.226	Determination of Effective Cathodic Protection on Well Production Casings				X
186.227	Well Production Casing Potential and Polarization Profiles				X
187.0050	Cutting into Gas Mains, MSAs and Abandoned Substructures - Safety Precautions	X			X
187.0055	General Welding Requirements	X		X	X
187.0056	Welding Field Guide	X		X	X
187.0103	Purging Pipelines Using Air Movers for Cold Tie Operations	X		X	X
187.0120	Fusing Socket Connections - Polyethylene (PE) Pipe	X		X	X
187.0125	Electrofusion Process - General Instructions	X			X
187.0126	Magic Box - 2"-4"	X			X
187.0138	PE Saddle Fusions	X		X	X

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Gas Safety Plan Chapter					
Policy	Title	4	5	6	7
187.0140	Transition Fittings	X			
187.0145	Valve Installation and Valve Box Assemblies for Polyethylene			X	X
187.0146	Excess Flow Valve (EFV) - Installation and Operation	X		X	X
187.0155	Butt Fusing 2", 3" and 4" PE Pipe (Manual Machines)	X		X	X
187.0158	4", 6" and 8" Polyethylene (PE) Butt Fusion (Hydraulic Machines)	X		X	X
187.0170	Connect Copper Wire to Steel Pipe - Pin Brazing, Thermite Welding and Braze Welding Processes				X
187.0175	Inspection and Testing of Welds on Company Steel Piping	X		X	X
187.0180	Qualification and Re-Qualification of Welders	X		X	X
187.0181	Qualification of Personnel - Polyethylene Pipe Joiners	X		X	X
187.0200	Radiographic Examination API 1104			X	X
187.0210	Service-To-Main Connection (SMC)			X	X
188.0001	Standard Specification for Natural and Substitute Fuel Gases	X		X	
189.0001	Odorization	X		X	X
189.0002	ODORIZATION-YZ NJEX Odorant Injection System Maintenance				X
189.0010	Supplemental Odorization of Gas at Border Stations	X		X	
189.005	Operation of Odorometer				X
189.0056	Odor Conditioning of New Customer-Owned Pipelines - Size 4 Meter (AC630) and Larger				X
189.01	Odorization - Roles and Responsibilities				X
190	Operator Qualification Task Change Communication	X		X	
191.0025	Scoring of Construction Work Inspected	X		X	X
191.01	Investigation of Accidents and Pipeline Failures	X	X	X	X
191.0210	Qualification of New Construction Contractors	X			X
192.0010	Preparation of Construction Sketches	X			
192.0020	Preparation of Completion Sketch			X	
192.0025	GIS Maintenance Requirements for High Pressure Gas Lines	X			X
192.0026	Records Management for High Pressure Project Closeout	X			X
192.0030	Completion Drawing Set Requirements for High Pressure Pipelines	X			X
192.0100	Archiving of High-Pressure Records in PDMS	X			X
192.02	Procedure for HCA Segment Identification	X			
1957	Gas Stub Tag		X		
203.007	Pipeline Patrol and Unstable Earth Self Audit	X		X	
203.008	Pipelines on Bridges and Spans Self-Audit	X		X	
203.016	Leak Survey Self-Audit	X		X	
203.017	Valve Inspections and Maintenance Self-Audit	X		X	
2110	Management of Change for Gas Standards Related to Integrity Management Programs	X			
2111	Management of Change - Request & Approval	X			
2112	Pipeline Database Update	X			

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Policy	Title	4	5	6	7
2120	Pipeline Feature Data Collection	X			
223.0001	CPUC and PHMSA Notification of Major New and Upgraded Pipelines and Pressure Test Failures of Pipelines	X	X		
223.0002	Minimum Trench Requirements for Transmission Pipelines	X		X	X
223.0003	General Construction Requirements - Steel Transmission System			X	X
223.0030	Failure Analysis Process for Gas Systems	X		X	X
223.0031	Abnormal Operations - Transmission	X	X	X	
223.0032	Incident Evaluation Process on Gas Systems		X		X
223.0065	Pipeline Patrol and Unstable Earth Inspections	X		X	X
223.0075	Pipeline Markers	X		X	X
223.0095	External and Internal Transmission Pipeline Inspection	X		X	X
223.0100	Leakage Surveys	X		X	X
223.0103	Aerial Leakage Surveys	X		X	X
223.0104	Optical Methane Detector Operation and Maintenance				X
223.0106	Updating of Pipeline Patrol Maps	X		X	X
223.0125	Leakage Classification and Mitigation Schedules	X		X	X
223.0126	Above Ground Leakage Classification and Mitigation Schedules	X		X	X
223.0130	Abandonment, Conversion and Reinstatement of Transmission Pipelines	X		X	X
223.0140	Excavating, Shoring and Sloping	X		X	
223.0145	Planning Shutdowns for Transmission and Storage	X	X	X	X
223.0155	Planning Pipeline Blowdowns	X		X	
223.0177	Measurement of Remaining Wall Thickness	X			
223.0180	Repair of Defects in Steel Pressure Piping	X		X	X
223.0181	Repair of Defects on Operating Pipelines Using Abandon Nipple				X
223.0183	Repair of Defects on an Operating Pipeline by Grinding	X			X
223.0185	Repair Leak on an Operating Pipeline with Band or Sleeve	X			
223.0188	Epoxy Grouted Non-Leaking Steel Sleeve Repairs - Above and Below Ground Piping	X			
223.0190	Repair of Non-Leaking Defects on an Operating Pipeline with a Band or Sleeve	X			X
223.0210	Vault Maintenance and Inspection	X		X	
223.0215	Valve Inspection and Maintenance - Transmission	X		X	X
223.0223	Valve Automation	X		X	X
223.0230	Identification Numbers for Pipeline Valves - Transmission	X		X	
223.0233	Transmission Line Identification and Records	X			
223.0240	Compressor Station Emergency Shutdown Systems	X		X	
223.0250	Compressor Station Equipment - Isolation and Purging for Maintenance or Alterations	X		X	
223.0255	Testing and Maintaining Compressor Station Emergency Shutdown Systems	X		X	X

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Policy	Title	4	5	6	7
223.0265	Identification Numbers for Station Valves	X			
223.0275	Main Reciprocating Gas Compressor Unit Operation – Transmission and Storage Operations	X		X	X
223.0280	Main Reciprocating Gas Compressor Maintenance – Transmission and Storage Operations	X		X	X
223.0315	Operation and Maintenance of Generator Units - Transmission and Storage Operations	X		X	X
223.0325	Main Centrifugal Gas Compressor Unit Operation	X		X	
223.0330	Main Centrifugal Gas Compressor Unit Maintenance	X		X	
223.0345	Pressure Relief/Pressure Limiting Devices, Testing/Inspection	X		X	X
223.0375	MAXIMO - Transmission and Storage Operations	X			X
223.0400	Gas Detectors in Compressor Stations	X		X	X
223.0410	Requirements for Designing Pipelines to Accommodate Smart Pigs	X		X	X
223.0415	Pipeline and Related Definitions	X		X	X
224.0000	Testing and Inspection of Safety Valves and Wellhead Valves				X
224.0015	Security and Accounting - Underground Storage Field Production Fluids				X
224.0030	Well Kill and Loading				X
224.010	Flow Erosion Monitoring and Assessment				X
224.02	Operation of Underground Storage Wells				X
224.023	Wireline and Slickline				X
224.05	Blowout Prevention Equipment				X
224.055	Well Unload				X
224.070	Reservoir Integrity and Inventory Assessment				X
224.101	Storage Well Design				X
224.102	Drilling Storage Wells				X
224.103	Well Workover				X
224.104	Well Isolation				X
224.105	Coiled Tubing				X
224.106	Casing and Tubing Inspection Field Procedure				X
224.107	Blowout Contingency Plan				X
224.108	Well and Reservoir Record Keeping				X
224.109	Abnormal Operating Conditions - Underground Storage				X
224.110	Wellsite Security and Safety				X
224.111	Training - Storage Wells and Reservoir				X
224.113	Gas Sampling - Underground Storage				X
224.114	Geological and Engineering Design				X
224.115	Inspection of Third-Party Wells				X
224.116	Nonconformance – Storage Wells and Reservoirs				X
224.117	Start-Up, Commissioning, and Decommissioning - Storage Wells and Reservoirs				X

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224.118	Plugged Well Inspections				X
224.119	Pressure Monitoring - Storage Wells and Reservoirs				X
224.120	Storage Field Interaction with Gas Control				X
224.121	Field Procedure - Emergency Incidents Storage				X
2849	Construction Inspection Report				X
3084	Corrosion Tests General Data Sheet	X			
3222	Design Data Sheet (DDS)	X		X	X
3506	Notice of Shutdown / Operational Deviation	X		X	
40-00	Polyethylene Pipe and Tubing				X
4090	100mV Polarization Form	X			
4091	Wax Casing Data Collection Form	X			
41-06.1	Pipe - Steel, Grades B through X70				X
50-15	Pipe Nipples				X
52-65	Fittings - Threaded, Malleable Iron				X
52-80	Couplings - Electrofusion, Polyethylene				X
52-81	Fittings, Socket & Saddle, Polyethylene Heat Fusion				X
52-82	FITTINGS, BUTT TYPE, POLYETHYLENE HEAT FUSION				X
52-96	Fittings - Butt Weld Steel				X
5330	Operating and Maintenance Order (OMO)	X			
54-17	Flanges and Flanged Fittings				X
54-17.1	Cast Iron Flanges				X
56-40	Stop Cocks				X
56-50	Steel to Plastic Transition Fittings				X
56-70.1	Risers - Service, Anodeless				X
56-70.16	Riser - Service Head Adapter				X
57-15	Canopies, High Pressure				X
58-08	Excess Flow Valve Assemblies				X
58-10	Valves - Thermoplastic				X
58-15.2	Valves; Ball, Steel Floating				X
58-70	Valves - Plug, Lubricated, Positive Shut-Off				X
58-82	Valves - Ball, Steel, Trunnion Mounted				X
58-96.6	Valve - Relief, Large				X
677-1	Pipeline Condition and Maintenance Report	X			
70-45	Regulator - Service, Standard Pressure				X
70-47	Regulators - High Pressure Spring Loaded				X
76-72	Odorant - 50/50 TBM/THT	X			
76-73	Thiophane Odorant	X			
76-95	Pressure Vessels				X
78-01	Meters - Diaphragm				X

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Policy	Title	4	5	6	7
78-02	Meters - Rotary				X
ACF	Assessment Completion Form	X			
CCM.1	Introduction	X			
CCM.10	Site Specific Plans	X			
CCM.11	Record Keeping	X			
CCM.4	Roles, Responsibilities, and Required Qualifications	X			
CCM.5	External Corrosion Control Requirements	X			
CCM.6	Examination of Exposed Buried Pipe	X			
CCM.7	Internal Corrosion Control Requirements	X			
CCM.8	Atmospheric Corrosion Control Requirements	X			
CCM.A	Terms, Definitions and Acronyms	X			
CRMP1	Control Room Management Plan	X		X	
CRMP6	Gas Control Management of Change	X		X	
DIMP1	Introduction	X			
DIMP2	System Knowledge	X			
DIMP3	Threat Identification	X			
DIMP4	Evaluate and Rank Risk	X			
DIMP5	Identify and Implement Measures to Address Risk	X			
DIMP6	Measure Performance, Monitor Results and Evaluate Effectiveness	X			
DIMP8	Periodic Evaluation and Improvement	X			
DIMP9	Report Results	X			
DIMPA	Terms, Definitions and Acronyms	X			
ER-1	Gas Emergency Management Preparedness and Response Policy	X	X	X	
F4-1	Threat Evaluation Form	X			
F8-1	Baseline Assessment Plan Revisions Log	X			
GC1	Gas Control Emergency Plan	X			
IIPP.01	IIPP-Table of Contents				X
IIPP.02	IIPP-Introduction				X
IIPP.1	Injury and Illness Prevention Program				X
IIPP.10	IIPP-Safety Meetings				X
IIPP.11	IIPP-Best Safety Practices				X
IIPP.12	IIPP-Southern California Gas Company Drug and Alcohol Misuse Prevention Program Plan				X
IIPP.2	IIPP-Supervisor Responsibilities				X
IIPP.3	IIPP-Records				X
IIPP.4	IIPP-Employee Responsibilities				X
IIPP.5	IIPP-Communications				X
IIPP.6	IIPP-Corrective Actions				X
IIPP.7	IIPP-Appendices				X
IIPP.8	IIPP-Local Safety Plans				X

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Policy	Title	4	5	6	7
PA-1	Public Awareness Plan		X		X
PP01.002	Management of Company Operations Standards - Definitions				X
PP02.005	Material Code Request Guidelines	X			
PP02.018	Material Tracking and Traceability Levels	X			
PP02.019	Material Quality Assurance (QA) – Procedures and Guidelines	X			
QUALPROG	Quality Program Manual for Owner-User Inspection of Air Tanks				X
SIMP.1	Introduction				X
SIMP.10	Procedures and Training				X
SIMP.11	Minimizing Environmental and Safety Risks				X
SIMP.14	Communications Plan	X			
SIMP.15	Emergency Response Plan	X			
SIMP.2	Data Collection and Management	X			
SIMP.3	Threat Identification and Risk Assessment	X			
SIMP.4	Integrity Assessment and Remediation	X			
SIMP.5	Preventive and Mitigative Measures	X			
SIMP.8	Quality Assurance Plan	X			
SIMP.9	Records Management Plan	X			
TIMP.0	Table of Contents	X			
TIMP.1	Introduction	X			
TIMP.10	Remediation	X			
TIMP.11	Minimizing Environmental and Safety Risks	X			
TIMP.12	Preventive and Mitigative Measures	X			
TIMP.13	Continual Evaluation	X			
TIMP.14	Management of Change	X			
TIMP.15	Quality Assurance Plan	X			
TIMP.16	Record Keeping	X			
TIMP.17	Performance Plan	X		X	
TIMP.19	Communications Plan	X			
TIMP.20	Regulatory Interaction	X			
TIMP.3	HCA Identification	X			
TIMP.4	Data Gathering and Integration	X			
TIMP.5	Threat and Risk Assessment	X			
TIMP.8	Baseline Assessment Plan	X			
TIMP.9	Integrity Assessments	X			
TIMP.A	Terms, Definitions and Acronyms	X			

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