



2023 Gas Safety Plan

Our Mission is to build the cleanest, safest, most innovative energy company in America



March 15, 2023



Cedric L. Williams
Chief Safety Officer
555 W. 5th Street, M.L GCT 18A1
Los Angeles, CA 90013-1011

March 15, 2023

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 2023 Gas Safety Plan

Dear Mr. Zhang:

Southern California Gas Company (SoCalGas) is pleased to submit our 2023 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, safety is a core value and is at the foundation of everything we do. This commitment to safety is embedded in our culture and dedicated employees who work to safely and reliably operate the gas system to serve our customers.

SoCalGas' safety culture fosters a work environment where employees at all levels, work locations, and departments are empowered to continuously enhance the safety of our operations. Just as importantly, our culture and practices encourage employees to raise safety concerns including to "Stop The Job" if someone is ever concerned with the safety implications of a particular situation. Very simply, our employees take pride in their work and ownership for safety.

While a strong safety culture exists at SoCalGas today, we are committed to continuously enhancing the maturity of our culture. 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, a concerted effort to foster learning and further improve company safety culture and systems.

Additions and updates to the 2023 Gas Safety Plan are summarized in the table attached to this letter, and only those portions of the Gas Safety Plan that have new or have changed elements are attached. Please contact Alex Hughes at (949) 697-2539 or AHughes@SoCalGas.com if you have any questions regarding our submission.

Sincerely,

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

Cedric L. Williams

Chief Safety Officer

INTERNAL

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"> • Added relevant definitions • Updated SMS org chart to reflect current organization • Added Safety Forward section
Chapter 2- Senior Management Team Commitment to Safety	
Chapter 3 - Plan Development & Implementation	
Chapter 4 - 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 5 – Emergency Response	<ul style="list-style-type: none"> • Updated the Incident Response section • Updated the Training section • Updated the Communication and Stakeholder Outreach • Updated the Mutual Assistance Support
Chapter 6 – State and Federal Regulations	<ul style="list-style-type: none"> • Updated Figures A and B section • Beyond Regulatory compliance name changed to Beyond State and Federal Regulations
Chapter 7 – Continuing Operations	<ul style="list-style-type: none"> • Updated Safe and Reliable Storage and Transportation section • Updated Risk Management section
Chapter 8 – Emerging Issues	<ul style="list-style-type: none"> • Updated SoCalGas Monitoring of Emerging Issues section • Updated SB 1371 “Natural Gas Leakage Abatement” section • Updated Climate Change Adaption and Resiliency and name changed to Energy Resiliency • Enhanced Use of Satellite and Aerial Monitoring for Damage Assessments name change to Enhanced Use of Aerial Technologies for Leak Survey and Emissions Detection and updated section • Updated Pipeline and Hazardous Material Safety Administration (PHMSA) Regulations section. • Updated CalGEM Regulations section
Appendix - Safety Policy Documents	<ul style="list-style-type: none"> • Updated appendix

Table of Contents

I.	<i>INTRODUCTION</i>	5
1.	PUBLIC UTILITIES CODE SECTIONS 961, 963, 956.5 AND CPUC DECISION 12-04-010	5
2.	PURPOSE	6
3.	GAS SAFETY PLAN STRUCTURE	6
4.	SAFETY MANAGEMENT SYSTEM	6
5.	SAFETY FORWARD	8
6.	PROGRAM REVIEW AND MODIFICATIONS	9
II.	<i>SENIOR MANAGEMENT TEAM COMMITMENT TO SAFETY</i>	10
1.	INTRODUCTION	10
2.	SAFETY VALUES	10
III.	<i>PLAN DEVELOPMENT AND IMPLEMENTATION</i>	12
1.	STATE DIRECTIVES TO SUPPORT WORKFORCE PARTICIPATION	12
2.	SOCALGAS EMPLOYEE SAFETY PLAN CONTRIBUTION PROCESS	12
3.	EXTERNAL STAKEHOLDER SAFETY PLAN CONTRIBUTION PROCESS	14
IV.	<i>SAFETY SYSTEMS</i>	16
1.	SAFETY SYSTEMS AND CALIFORNIA PUBLIC UTILITIES CODE SECTIONS 961(d)(1) and (d)(2)	16
2.	TRANSMISSION INTEGRITY MANAGEMENT PROGRAM	17
3.	DISTRIBUTION INTEGRITY MANAGEMENT PROGRAM	18
4.	STORAGE INTEGRITY MANAGEMENT PROGRAM	19
5.	FACILITIES INTEGRITY MANAGEMENT PROGRAM	20
6.	OPERATION AND MAINTENANCE PLAN	20
7.	PIPELINE SAFETY ENHANCEMENT PLAN	21
V.	<i>EMERGENCY RESPONSE</i>	22
1.	EMERGENCY RESPONSE AND CALIFORNIA PUBLIC UTILITIES CODE SECTIONS 961(d)(5), (d)(6) and (d)(8)	22
2.	SOCALGAS' COMPREHENSIVE APPROACH TO EMERGENCY RESPONSE	22
3.	THE GAS EMERGENCY MANAGEMENT PREPAREDNESS AND RESPONSE POLICY	25
VI.	<i>STATE AND FEDERAL REGULATIONS</i>	27
1.	STATE AND FEDERAL REGULATIONS AND CALIFORNIA PUBLIC UTILITIES CODE SECTIONS 961(c), (d)(7), and (d)(9)	27
2.	REGULATORY OVERSIGHT	27
3.	COMPLIANCE WITH GENERAL ORDER 112-F	28
4.	BEYOND STATE AND FEDERAL REGULATIONS	29
VII.	<i>CONTINUING OPERATIONS</i>	33

1. CONTINUING OPERATIONS AND CALIFORNIA PUBLIC UTILITIES CODE SECTION 963 (b)(3) AND SECTIONS 961 (d)(3), (d)(4), and (d)(10)	33
2. SAFE AND RELIABLE STORAGE AND TRANSPORTATION	33
3. SOCALGAS WORKFORCE SIZE, TRAINING AND QUALIFICATIONS	34
3.1. Workforce Size.....	34
3.2. Field Operations Training	35
3.3. Qualification of Pipeline Personnel	36
4. DRUG AND ALCOHOL MISUSE PREVENTION PLAN	37
5. RISK MANAGEMENT	37
6. ADDRESSING THE COVID-19 PANDEMIC	38
VIII. EMERGING ISSUES	40
1. EMERGING ISSUES AND CALIFORNIA PUBLIC UTILITIES CODE § 961 (d)(11)	40
2. SOCALGAS MONITORING OF EMERGING ISSUES	40
3. COLLABORATION WITH REGULATORY AGENCIES	40
GAS SAFETY PLAN APPENDIX	50
Policy Document – Safety Plan Matrix	51

I. INTRODUCTION

This Gas Safety Plan conveys the safety commitment of SoCalGas' Senior Management Team, sets forth all the safety plans, programs, policies, standards, and procedures that are designed to support that commitment, and describes the Company's comprehensive Safety Management System (SMS) framework. The Gas Safety Plan and the SMS Plan are the foundational documents that communicate SoCalGas' safety commitment. 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' safety focus includes public safety,¹ system safety,² employee safety,³ and contractor safety.⁴ The Safety Plan and the 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.

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 that each gas corporation in California develop a plan for the safe and reliable operation of its gas pipeline facility and requires that the California Public Utilities Commission (Commission or CPUC) 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.

¹ 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).

² Safety systems and processes associated with the design, construction, operation, inspection and maintenance of SoCalGas' infrastructure.

³ Safety systems and processes focused on the health and safety of our employees. This includes safety policies, programs and training.

⁴ Safety systems and processes focused on the safety and protection of our contractors and subcontractors who provide services to support SoCalGas assets and operations.

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.”⁵ 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.”⁶ This Gas Safety Plan also addresses the ongoing advancement of its SMS. SoCalGas’ company-wide implementation of a comprehensive SMS framework further integrates safety learning and continuous improvement efforts that builds upon the existing strong safety culture.

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 and to advancing a comprehensive SMS framework.

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

4. SAFETY MANAGEMENT SYSTEM

The SoCalGas SMS is a framework that supports and enhances SoCalGas’ longstanding commitment to safety. It touches all areas of safety, including public safety, system safety, employee safety, and contractor safety. SMS is a collection of structured, company-wide processes and systems with effective risk-based decision-making for daily business functions. This system is embedded in every action and is foundational to the Company for the safe and reliable delivery of service to our customers – from employee training to the installation, operation, and maintenance of our utility infrastructure.

To further demonstrate SoCalGas’ commitment to safety, a Chief Safety Officer role was established in 2019 and further refined in 2021. SoCalGas’ SMS organization reports directly to the Chief Safety Officer as depicted below in Figure 1.

⁵ D.12-04-010 at 19.

⁶ Pub. Util. Code section 963.

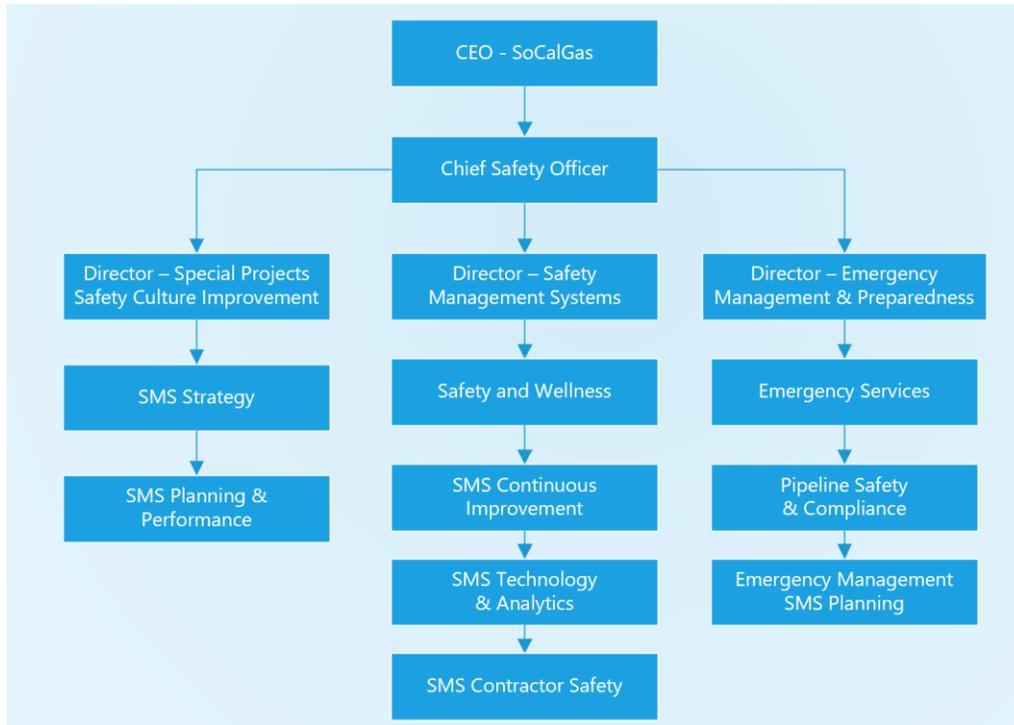


Figure 1: SoCalGas' SMS Organization

The purpose of the SMS organization is to continuously evolve and improve SoCalGas' SMS and approach to safety. The core of that approach is based on SoCalGas' seven Safety Values:

1. Leadership Commitment
2. Risk Management
3. Employee and Stakeholder Engagement
4. Competence, Awareness and Training
5. Emergency Preparedness and Response
6. Safety and Compliance Assurance
7. Continuous Improvement

These Safety Values are actualized through the Plan-Do-Check-Act model depicted below in Figure 2. Our SMS is about being more deliberate and intentional about integrating our safety systems and processes. The Company's goal is to continuously strengthen our safety culture by living these values.

INTRODUCTION	SoCALGAS: SP.1-SC
---------------------	--------------------------



Figure 2: SoCalGas’ Integrated Plan-Do-Check-Act Model

SoCalGas’ journey of developing its SMS began more than a decade ago when it first implemented a management system related to safety and environmental compliance, the Environmental & Safety Compliance Management Program (ESCMP). ESCMP is conceptually based on the International Standards Organization (ISO) 14001 Environmental Management Systems standard and includes safety components that are unique to SoCalGas. SoCalGas’ integrity management programs are another element of SMS that were instituted to manage and enhance the integrity of our system.

These programs have been refined, improved, matured and are in place companywide. SoCalGas has leveraged this knowledge and experience to create its SMS to further enhance safe operations, strengthen our safety culture, improve safety performance, and build capacity to be safe, and reduce risk to the public, employees, contractors, and the system.

5. SAFETY FORWARD

SoCalGas’s approach to safety is built on the company’s value and commitment to continuous improvement, which encourages seeking opportunities to learn and improve. In 2022, SoCalGas engaged in efforts to further understand, learn, and improve its safety culture through Safety Forward, which is based on learnings, observations, and recommendations contained in the independent Safety Culture Assessment of SoCalGas and Sempra Energy, A Report by Evolving Energy Consortium.

Safety Forward builds upon SoCalGas’ strong safety foundation to achieve and maintain SoCalGas’ safety culture vision: a culture that embraces learning, improvement, and risk mitigation as core aspects of our shared duty to protect the public, the environment, our system, and employees. Through employee dialogues, collaboration, and self-reflection, Safety Forward is designed to enhance company safety culture by:

- Broadening focus on public, system, employee, and contractor safety;

INTRODUCTION	SoCALGAS: SP.1-SC
---------------------	--------------------------

- Collaborating with and empowering employees to better manage risk;
- Critically reviewing our current systems, processes, resources, and procedures for opportunities to strengthen and improve;
- Enhancing learning as individuals, as teams, and as a company.

To support this comprehensive effort, SoCalGas identified a cross-functional team of executive sponsors and initiative leads to provide leadership to Safety Forward workstreams and initiatives. SoCalGas has launched several foundational learning and engagement efforts as part of Safety Forward to support understanding, reflection, and awareness; and build trust and psychological safety.

6. 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.

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
TIMP O&M Control Room Management	At least annually
SIMP	Annually (not to exceed 15 months)
DIMP	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 Publish⁷ process, and not deferred until the next scheduled review.

⁷ PP01.040 Submitting a Revised Company Operations Standard for Publication
Copyright ©2012-2023 Southern California Gas Company. All rights reserved.

II. SENIOR MANAGEMENT TEAM COMMITMENT TO SAFETY

1. INTRODUCTION

SoCalGas focuses on safety through the lenses of public safety, system safety, employee safety, and contractor safety. This safety focus is the foundation of our business and helps to organize effort around our fundamental core 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.

SoCalGas is committed to fostering a culture where leadership sets the example, cultivates psychological safety, and models the behaviors expected of all employees. SoCalGas' leadership team is committed to championing people, doing the right thing, shaping the future, and executing on operational excellence. 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.

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, as further described below.

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 safety, system safety, employee safety, and contractor safety. They demonstrate leadership commitment to enhancing safety performance by communicating and modeling to their organizations the importance of safety, SoCalGas' safety values, and responsibility to enhance our approach to safety.

2. SAFETY VALUES

SoCalGas has developed Safety Values and integrated them throughout our SMS to improve and enhance safety through our people, policies, procedures, and programs. Our focus is to make sure the values translate into and guide what employees do every day. It is a living set of policies and documents that embodies the Company's values.

1. Leadership Commitment

SoCalGas leadership is fully committed to safety as a core value. SoCalGas’ Executive Leadership is responsible for overseeing reported safety concerns and promoting a strong, positive safety culture and an environment of trust that includes empowering employees to identify risks and to “Stop the Job” when necessary.

2. Risk Management

SoCalGas manages risk through a structured, increasingly data-driven approach that identifies threats and hazards, assesses and prioritizes risks, implements mitigation efforts, and engages in assessments and reviews to understand risk mitigation effectiveness.

3. Employee and Stakeholder Engagement

SoCalGas encourages and expects employees to take ownership for safety, actively engage in safety practices, and openly share and receive information with one another, our contractors, and external stakeholders to continuously enhance our safety practices.

4. Competence, Awareness and Training

SoCalGas is committed to providing employees the proper tools, resources, training, and oversight to promote safe operations. This includes training tailored to specific roles and educating employees on why our training, policies, and procedures are important to safety.

5. Emergency Preparedness and Response

SoCalGas maintains readiness to promptly respond to emergency incidents and events through an Incident Command System that incorporates response planning, training and equipping of personnel, and coordination with first responders and external stakeholders.

6. Safety and Compliance Assurance

SoCalGas maintains operational policies and procedures that document safety practices, standards and compliance with applicable regulations and follows a “management of change” process to structure change when new policies and procedures are implemented.

7. Continuous Improvement

SoCalGas strives to continuously improve and strengthen its safety performance and culture by setting clear and measurable goals, assessing safety performance through audits and self-assessments, inviting employee feedback, and applying lessons learned from incidents and near-miss events. SoCalGas also learns from and shares safety best practices among peer gas utilities and best-in-class companies in other industries.

These Safety Values are Company policy. Each SoCalGas officer embraces and endorses the Company’s commitment to safety and supports the SMS.

III. 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 SAFETY PLAN CONTRIBUTION PROCESS

When it comes to safety, all SoCalGas employees are important internal stakeholders. Communication begins with senior management through our leadership commitment and cascades to all employee levels. The seven Safety Values that are the foundation of the SMS include a specific value dedicated to employee and stakeholder engagement, which is critical to providing clarity to employees, so that policies, goals, objectives, and procedures are understood.

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 for continuous improvement as this enables the Company to gather safety-related input from its employees.

To promote a culture of trust and increase the likelihood of reporting known safety risks, the Company is committed to enabling its employees to participate in the continuous improvement of this Gas Safety Plan. The Gas Safety Plan is posted on the Company intranet site for ready access by 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 hierarchy. Employees can also make reports anonymously.

Periodic employee reminder updates are made through Company communication channels to remind employees of the site's availability and the importance of reporting known issues and improvement ideas. The importance of reporting safety risks is included in employee training course materials.

SoCalGas expects employees to identify risks and elevate them to management pursuant to the Injury & Illness Prevention Program (IIPP). 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.⁸ These include:

- Regularly scheduled meetings with employees to gather input and make sure we are addressing issues or concerns related to our commitment to safety;
- Access to an online safety suggestion box for non-emergency and nonurgent safety related suggestions, ideas and/or concerns;
- Submission of suggestions via written notification, online, or by phone;
- Utilizing the online platform Safety Observation and Reporting (SOAR), company employees as well as contractor employees can submit a safety suggestion;
- Regular employee local safety committee meetings, including Executive Safety Council meetings; and
- Annual Safety Congresses and District Safety Standdowns across our entire service territory.

SoCalGas takes the inputs received seriously and acts with expediency in the investigation of input received. For example, SoCalGas employees report Near Misses and Stop-the-Jobs to identify incidents where no injury, illness or damage occurred but there was the potential for injury, illness, or damage (Near Miss) and 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 (Stop the Job). 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

⁸ Concerns are also reported via the Ethics & Compliance Helpline. Safety related issues are flagged for prioritization.

PLAN DEVELOPMENT & IMPLEMENTATION	SoCALGAS: SP.3-SC
--	--------------------------

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.

SoCalGas strives to make determinations of evaluations quickly; however, the objective is to complete a thorough evaluation consistent with the Company's commitment to continuous improvement. This means that an issue may not be resolved for some time as enhancements are planned and implemented. Every suggestion is reviewed to determine how it reduces risk and improves safety. This helps us go beyond meeting regulatory requirements to proactively creating industry leading practices in safety.

Employees and contractors are periodically reminded and encouraged through various communication channels to submit input through this process to support the Company's goal of capturing ideas and suggestions related to safety.

Contractor Engagement

An important element of the SMS stakeholder engagement is including feedback from contractors who have direct knowledge of operations and supporting activities. Contractor input is highly valued and critical to supporting continuous improvement, which is addressed through the following platforms:

- SOAR
- Gold Shovel Standard⁹
- ISNetwork (ISN)
- Veriforce
- Contractor Safety Program
- Contractor Safety Manual
- Capital Project Outreach
- Quarterly Contractor Meetings
- Annual Contractor Safety Congress

3. EXTERNAL STAKEHOLDER SAFETY PLAN CONTRIBUTION PROCESS

SoCalGas manages engagement with external stakeholders through its Public Awareness Plan.¹⁰ 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 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:

⁹ The Gold Shovel program has been acquired by the Common Ground Alliance (CGA) and the CGA has indicated that it will be building a new program called Damage Prevention Institute (DPI) to which the contractors in Gold Shovel will be transferred. See <https://dpi.commongroundalliance.com/FAQs>.

¹⁰ PA-1 Public Awareness Plan

PLAN DEVELOPMENT & IMPLEMENTATION	SoCALGAS: SP.3-SC
--	--------------------------

- 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

The only key 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), Dig Safe Board, 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, and various departments within the SMS organization.

IV. 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 achieve 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. As noted in Chapter III, Sections 2 and 3, our safety programs cover SoCalGas employees, contractors, customers, and the public as part of our safety systems. Additionally, 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

The pipeline integrity management programs (*i.e.*, TIMP, DIMP) were established, in accordance with 49 CFR Part 192, Subparts O, P, and A, to address safety-related risks on the natural gas system. SoCalGas also implemented its Pipeline Safety Enhancement Plan (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 is developing a FIMP to mitigate safety-related risks associated with transmission facilities, aboveground storage facilities and Natural Gas Vehicle (NGV) fueling facilities.

Risk to operations related from loss of experienced and knowledgeable employees is managed through multiple methods, including working with local management to develop succession plans for critical job functions, and is continuously evaluated and improved upon to further enhance safety. This is further addressed in Chapter VII, Section 3 - SoCalGas Workforce Size, Training and Qualifications.

2. TRANSMISSION INTEGRITY MANAGEMENT PROGRAM

The Transmission Integrity Management Program (TIMP) was developed in 2004 in accordance with the requirements of the Department of Transportation’s (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA), Subpart O – “Gas Transmission Pipeline Integrity Management” of Part 192 of Title 49 of the Code of Federal Regulations and is an ongoing program. SoCalGas’ TIMP is continuously reviewed and improved.

TIMP is designed to provide assessments and integrity improvements on transmission pipelines 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 action steps for those threats.

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

The risk evaluations for DOT-Transmission segments in the scope of the 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’ preferred assessment method where applicable because it provides the most comprehensive set of data regarding the condition of the assessed pipeline. For pipelines in the SoCalGas system that require assessment, approximately 1205 miles (~89%) are planned to be evaluated using ILI methods. These pipeline assessments support the safe operation of the transmission pipeline by enhancing the efficiency of 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 safety, and the integrity of our transmission pipeline system is managed, enhanced, 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).

PHMSA’s final rule amending 49 C.F.R. Parts 191 and 192 Pipeline Safety: Safety of Gas Transmission and Gathering Pipelines (“GTGS Rulemaking”):

- 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 the TIMP accordingly. Additionally, under the TIMP, SoCalGas has expanded assessments to additional outside-of-High Consequence Area (HCA) segments 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 requirement.
- The GTSR Part 2, titled “Safety of Gas Transmission Pipelines: Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, and Other Related Amendments” includes amendments to 49 CFR Part 192, Subpart A (General – Definitions and Management of Change), Subpart I (Requirements for Corrosion Control), Subpart L (Operations – Extreme Weather Events), Subpart M (Maintenance) and Subpart O (Gas Transmission Pipeline Integrity Management), and was published August 24, 2022 and will take into effect on May 24, 2023.

PHMSA also amended 49 C.F.R. Parts 192, 195, “Pipeline Safety: Requirement of Valve Installation and Minimum Rupture Detection Standards” was published on April 8, 2022, and took effect on October 5, 2022. This will involve new notification processes of “potential ruptures,” installation requirements of “Rupture Mitigation Valves,” and annual risk analysis not to exceed 15 months.

3. DISTRIBUTION INTEGRITY MANAGEMENT PROGRAM

The Distribution Integrity Management Program (DIMP) is designed to create a safe and reliable natural gas supply and delivery system by maintaining gas distribution system integrity. Continuous improvement elements are integrated into the program using data and risk identification to drive prioritization of activities. It is an ongoing program that was developed in accordance with the requirements of the Department of Transportation’s (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA), 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 by having operators identify and reduce pipeline integrity risks on distribution pipelines.

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, it gathers system knowledge, evaluates and ranks risk, implements programs to address risk, measures performance, monitors results, 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 subsequent undertakings 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’ distribution system and documenting relevant system information. In 2022, DIMP implemented

SAFETY SYSTEMS	SoCALGAS: SP.4-SC
-----------------------	--------------------------

improvements to its safety-based vintage pipeline replacement program addressing specific threats on distribution medium pressure mains; corrosion for steel mains and construction defect, material failure/defect, natural cause, prior pinch, and tree root damage for plastic mains. The program now utilizes a segment-specific quantitative risk analysis, moving from a relative risk analysis, using a combination of internal SoCalGas datasets and external publicly available data sources.

SoCalGas' DIMP is reviewed, at minimum, every five calendar years as part of the periodic improvement process, with modifications being made as necessary.

4. STORAGE INTEGRITY MANAGEMENT PROGRAM

The Storage Integrity Management Program (SIMP) was proposed by SoCalGas in 2014, approved by the CPUC, and established in 2016 to enhance safety and mitigate risks and validate and enhance well, reservoir, and surface asset integrity using enhanced risk management activities, processes, and procedures. SIMP activities comply with CalGEM regulations as defined in 14 California Code of Regulations (CCR) §1726, the Department of Transportation's (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) regulations as defined in 49 CFR 192.12, Subpart A, as well as applicable industry standards.

The purpose of SIMP is to manage well, reservoir, and surface assets integrity, assess risks and threats, and mitigate potential storage well 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 such activities 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.

The 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 the SIMP and calls for storage assets to be generally addressed in three categories: (1) Wells, (2) Reservoir, and (3) Surface Assets. The SIMP plan focuses on storage wells (and includes other wells that penetrate the storage reservoir), reservoir, and fluid management for 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, and in response to changing conditions or new regulatory requirements.

5. FACILITIES INTEGRITY MANAGEMENT PROGRAM

SoCalGas is developing a Facilities Integrity Management Program (FIMP) to provide a comprehensive, systematic, and integrated approach for managing and enhancing the safety and integrity of facilities and associated equipment. This program includes equipment at Aboveground Natural Gas Storage facilities, Transmission facilities such as compressor stations and pressure limiting stations, renewable natural gas facilities, and natural gas vehicle fueling stations. The FIMP is based on principles published by the Canadian Energy Pipeline Association (CEPA) and the Pipeline Research Council International (PRCI).

The FIMP differs from other integrity management programs as the type of equipment covered by the program varies substantially (e.g., vessels, tanks, piping of different materials/grades, electrical equipment, rotating equipment such as pumps and compressors). Through FIMP, the Company will develop and implement comprehensive inspection programs and incorporate integrity management principles and industry best practices to facilities' equipment to reduce risks and promote safety, sustainability and operational excellence. SoCalGas proposed FIMP as a new program in its 2024 General Rate Case (GRC). Pilot activities, currently underway, are expected to be integrated and expanded on from 2024 onwards.

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:

- 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;
- 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

SAFETY SYSTEMS	SoCALGAS: SP.4-SC
-----------------------	--------------------------

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 rulemaking (R.)11-02-019 which resulted in a subsequent decision, 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.

In response, SoCalGas and SDG&E submitted their Pipeline Safety Enhancement Plan (PSEP). The 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 the PSEP are to: (1) enhance public, system, employee, and contractor 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.

The 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 potential pipeline failure and decrease the time to identify, investigate, prevent, remediate, or manage the effects of such an event.

V. 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 implements and continuously improves several programs, policies, standards, and procedures to safely respond to emergencies. These activities and procedures were created to limit impacts from accidents and provide timely response to customer and employee reports of leaks, hazardous conditions, and emergency events such as earthquakes, fires, and/or mudslides.

Through Emergency Management communications, the Company provides quick response and awareness to internal and external stakeholders which enhances the response from field operation groups. SoCalGas has also implemented the use of external tools such as Data Capable® to assist with awareness of incidents and situational monitoring. This system provides alerts and notifications of significant events (*e.g.*, fires, earthquakes, and planned demonstrations) that may affect or impact SoCalGas employees, customers, and/or facilities.

EMERGENCY RESPONSE	SoCALGAS: SP.5-SC
---------------------------	--------------------------

SoCalGas prepares and maintains written plans and standards that address emergency or natural disaster situations, including a Gas Emergency Management Preparedness and Response Policy, which is described in further detail in the following section. As part of these plans and standards, employees are trained and equipped to:

- Respond safely and promptly;
- Direct their actions toward protecting people first and then property;
- Maintain gas service to customers where possible; and
- Restore the affected pipeline system and Company operations to normal status following an emergency or disaster.

These plans and standards may include written gas-handling plans, alternative gas handling plans and various considerations when performing gas handling/pressure control such as the operation of critical valves, control equipment and instrumentation.

Employees are to adhere to these plans and standards when performing these duties and to take precautions to prevent outages, over-pressurization, errors in mapping or planning, and other safety concerns.

Employees performing specified tasks must be trained on the policies and procedures to complete their duties safely. Business Continuity Plans address continuity planning to support organizational stability in the event of a major business disruption so critical functions can continue during and after an emergency with minimal disruption.

SoCalGas has an extensive on-call/call-out structure to respond to incidents at any time, throughout the year; and it includes employees at all levels from field personnel to executives.

Incident Response

During an activation for incident response, SoCalGas' Emergency Management framework is modeled after the Federal Emergency Management Agency (FEMA) Incident Command System (ICS), which allows for a multi-level emergency response organization. The ICS is a nationally recognized, standardized approach to incident management that provides responders with an integrated organizational structure that matches the complexities and demands of the incident and can expand or contract to meet incident needs.

Integrating the ICS structure outlines communication standards for inter-functional (e.g., Transmission, Distribution, and Customer Services Field) and inter-agency (e.g., fire, police, and emergency officials) cooperation during an emergency incident and responsibilities within the Company to facilitate a coordinated response with partnering agencies.

The categorization of the incident determines the level of support and resources in response. SoCalGas responds immediately to emergencies in coordination with first responders as needed. Processes are in place when customers contact 911 if they suspect an emergency related to natural gas. First responders have direct contact channels with SoCalGas Emergency Management and Dispatch to receive needed support in response to an incident. Non-emergency conditions that may be potentially hazardous are evaluated based upon the information reported to the Company.

Training

SoCalGas conducts regular emergency preparedness exercises and drills to promote employee proficiency in emergency assignments, validate the effectiveness of its emergency plans, and identify continuous improvement opportunities. These exercises may include external agencies and cover a wide range of emergencies, including threats to employees/contractors, public, and pipeline safety.

The effectiveness of the response is evaluated following these emergency preparedness exercises and drills via an after-action report, which includes an improvement plan where strengths and lessons learned are identified, and continuous improvement opportunities are implemented. This may include enhancements to policies, plans, procedures, or processes and training.

Also, SoCalGas emergency responders must complete the required FEMA training consistent with their assigned responsibilities. This training may include ICS and/or first responder training for field management personnel who respond to emergencies.

Communication and Stakeholder Outreach

SoCalGas conducts a robust outreach program with first responders on a routine basis to educate first responders (e.g., fire, police, and emergency officials) on how to safely respond to natural gas related incidents and to establish local contact between SoCalGas Field Operations departments and first responders.

Company Emergency Management and Regional Public Affairs staff meet with first responders to discuss pipeline safety and communication. These first responders are invited to participate in Company drills and exercises as participants and/or observers.

SoCalGas' service territory encompasses twelve counties, each with designated emergency County Coordinators. Annually, a representative from Emergency Management or a delegate will meet with each County Coordinator to discuss pipeline safety and awareness.

SoCalGas maintains a public awareness program to inform and educate customers, affected public, pertinent public officials and municipal staff, and persons engaged in excavation-related activities about the prevention and recognition of gas pipeline emergencies. This program also includes the process for reporting an incident to SoCalGas and the appropriate public officials including first responders.

Mutual Assistance Support

Mutual assistance advances and supports safety by structuring how organizations can provide support and assistance to maintain utility service during an emergency incident. Signatories to a mutual assistance agreement (MAA) may receive and provide assistance in the form of personnel and equipment to aid in restoring and/or maintaining utility service when such service has been disrupted by natural disasters, equipment malfunctions, accidents, sabotage, or any other occurrence for which emergency assistance is deemed to be necessary.

Participation in MAA's is seen as a critical component of the Federal National Incident Management System (NIMS), which is intended to provide a systematic approach to guide governments at all

EMERGENCY RESPONSE	SoCALGAS: SP.5-SC
---------------------------	--------------------------

levels, non-governmental organizations, and the private sector in collaborative emergency preparedness and response activities.

The Company maintains MAAs with utilities and municipalities (such as the City of Long Beach, Pacific Gas and Electric Company, San Diego Gas & Electric Company), and various non-profit organizations including the American Gas Association (AGA), California Utilities Emergency Association (CUEA), Northeast Gas Association (NGA), and Western Region Mutual Assistance Group (WRMAG).

These agreements cover the rights and obligations of those who respond to requests for assistance and guidelines concerning the work of personnel involved in the response.

Mutual Aid Regions are established under the Emergency Services Act by the Governor. Six Mutual Aid Regions, numbered I-VI, have been established within California. Each Region is also designated into three Administrative Regions designated as Coastal Region, Inland Region, and Southern Region.

A requesting utility experiencing a major emergency and in need of the Company's assistance may make a request for assistance. Emergency Management facilitates and coordinates the activation of mutual assistance with the approval of the Executive Officer On-Call, and/or an authorized Officer of the Company.

Emergency Management keeps a copy of each MAA on file and maintains checklists and other documents regarding requests for mutual assistance.

Based on the request, the appropriate level of leadership participates in and reviews the scheduling and findings of emergency preparedness activities.

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

3. THE GAS EMERGENCY MANAGEMENT PREPAREDNESS AND RESPONSE POLICY

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. section 192.615. It also 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

EMERGENCY RESPONSE	SoCALGAS: SP.5-SC
---------------------------	--------------------------

- 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
- 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

VI. 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 regulatory, 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 the Commission's 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 the Commission's General Order 112-F.

SoCalGas' storage wells are operated and maintained primarily pursuant to PHMSA regulations at the federal level, and California's Geologic Energy Management Division (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.

STATE AND FEDERAL REGULATIONS	SOCALGAS: SP.6-SC
--------------------------------------	--------------------------

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

SoCalGas' 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 new laws, rules, and regulations, the departments of Pipeline Safety and Compliance and Integrity Management and Strategic Planning 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 documents 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 the 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

STATE AND FEDERAL REGULATIONS	SoCALGAS: SP.6-SC
--------------------------------------	--------------------------

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.

- 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’ 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

STATE AND FEDERAL REGULATIONS	SOCALGAS: SP.6-SC
--------------------------------------	--------------------------

- American National Standards Institute
- The American Petroleum Institute
- The American Society of Mechanical Engineers technical committees (B31Q, B31.8, B31)
- 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
- Pipeline SMS
- 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
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

STATE AND FEDERAL REGULATIONS	SOCALGAS: SP.6-SC
--------------------------------------	--------------------------

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. The other activities are one-time events that were completed and are noted as “completed”.

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
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

GAS SAFETY PLAN

STATE AND FEDERAL REGULATIONS	SOCALGAS: SP.6-SC
Industry Actions	Implementation Type & Responsible Organization
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
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

VII. 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: socalgas-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 make sure 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 integrity 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 contracts are maintained with qualified service providers to complete work and address variability

CONTINUING OPERATIONS	SoCALGAS: SP.7-SC
------------------------------	--------------------------

in work demand throughout the year. As part of the planning process, management reviews its projected workforce to adequately fulfill safety, compliance, maintenance, and construction obligations. If local management cannot fulfill these obligations, they raise the need as part of the resource allocation and funding process. During the year, as resource vacancies occur or as work levels significantly change, local management reassesses the need for the workforce and submits a request 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.

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 an annual planning exercise) to develop hiring and development plans and budgets to supplement or replenish the workforce as necessary to sustain the safety and integrity of its system.

The Company uses contractors, as necessary and in compliance with bargaining agreements, so that sufficient overall resources are deployed to address maintenance and construction. SoCalGas requires that contractor employees 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 with the ability 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.

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 on 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 and Bakersfield.

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

CONTINUING OPERATIONS	SOCALGAS: SP.7-SC
------------------------------	--------------------------

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.

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 class 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.

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 Code of Federal Regulations 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' 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 reassessed 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.

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, has

CONTINUING OPERATIONS	SoCALGAS: SP.7-SC
------------------------------	--------------------------

been retained to provide 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 misuse of 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.



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, 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 is developing an Enterprise Asset Management (EAM) program, which will align 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. EAM is intended to improve safety, integrity, transparency, and availability of pipeline asset records by integrating asset data for advanced analytics within an asset investment planning tool. By integrating pipeline asset data with risk modeling, SoCalGas is developing an operating model to support a risk-based value framework to operationalize a risk-informed operations strategy.

6. ADDRESSING THE COVID-19 PANDEMIC

In March 2020, SoCalGas activated its Emergency Operations Center (ECO) in response to the unprecedented challenges of the COVID-19 pandemic. To align with city, county, and state emergency entities, SoCalGas utilized the Incident Command System (ICS) structure to establish the objectives below to provide a coordinated response and common operating picture to internal and external stakeholders.

Due to the duration of this health event, SoCalGas EOC has maintained an activation for over 1050 days and was deactivated on February 28, 2023, aligning with the end of the Governor's emergency order. The goals of our COVID-19 response have remained consistent as follows:

1. Health and Safety - Protect the health and safety of our employees, contractors, and the communities we serve
2. Essential Operations - Maintain safe operation of the gas system
3. Communication - Provide information to employees, contractors, customers, and stakeholders

Using the ICS framework and setting clear objectives, SoCalGas was able to effectively develop and implement updated health and safety policies and procedures based on federal, state, and local pandemic guidelines. Our policies and procedures consist of: Quarantine and Notification protocols, COVID-19 Safety Playbook, Health Screening Questions, Face Covering Requirements, Social

GAS SAFETY PLAN

CONTINUING OPERATIONS	SoCALGAS: SP.7-SC
------------------------------	--------------------------

Distance Guidance, Safety Practices for Construction Sites and, Entered Work Orders. These safety policies and procedures mitigate risk and support the safety of our employees, contractors, and communities we serve.

Additional reinforcement of COVID-19 health and safety protocols included safety messages and signage throughout each facility. The signage provides reminders to adhere to the protocols and of the importance of physical distancing, wearing face coverings, handwashing, personal hygiene, and the location of safety supplies. All facilities are stocked with additional supplies, including disposable face coverings, tissues, and hand sanitizer. Water distribution systems and heaters are proactively monitored and maintained with new replacement filters. Heating and cooling systems have been serviced, and new filters with higher filtration levels have been installed. Air circulation has also been optimized and fully serviced. Lastly, enhanced daily cleaning protocols are in use at every occupied facility, including our bases and branch offices. Each location is stocked with additional supplies to clean individual workstations and equipment.

In 2020 and 2021, approximately 50% of the SoCalGas workforce worked in a home-based environment while adjusting to new health and safety protocols. In 2022, with purposeful safeguards in place, SoCalGas introduced a hybrid model for its workforce. SoCalGas continuously monitors federal, state, and local agencies for any updates or changes to pandemic guidelines.

INTERIM

VIII. 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 include 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.

SoCalGas is continuing to address the emerging issues of the grandfathering of provisions in Title 49 of the Code of Federal Regulation (49 CFR) Part 192 as discussed in Chapter 4 of this Gas Safety Plan, along with the newly implemented requirements for MAOP reconfirmation, repair criteria, Integrity Management improvements, cathodic protection, management of change, and rupture mitigation, under the GTSR.

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
- Optic System for Pipeline Damage Prevention and Leak Detection
- Renewable Gas Connections and Hydrogen Blending
- Material Traceability
- Proposed modifications to PHMSA Regulations
- Proposed revisions to CalGEM Regulations
- Professional Engineering oversight policy resulting from Columbia Gas Merrimack Valley Incident

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 in addressing this important issue that could have a significant impact on safety for utilities and operators in the State.

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 submitted to the Commission, in March 2022. Upon the Commission’s approval, implementation of the activities for each best practice, outlined in the Compliance Plan, will begin in 2023 and will continue 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 optic 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. SoCalGas has repaired over 18,480 incremental non-hazardous leaks since beginning the Leak Abatement Program and will continue to reduce the leak inventory and leak repair timeframes.

Energy Resiliency

Energy Resilience addresses the risk to natural gas infrastructure and the natural gas system from both climate change related events themselves 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.

EMERGING ISSUES

SOCALGAS: SP.8-SC

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 can be 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.

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 Company transitions to a decarbonized state. 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 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.

SMS encourages operators to use the results of their risk assessments to continue to drive down the likelihood of asset-related safety incidents and events.

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 to identify potential impacted infrastructure due to the winter/rain season.

Also, SoCalGas has implemented the use of aerial drones that provide high-definition aerial imagery and three-dimensional topographic modeling to support damage assessments in these types of incidents.

EMERGING ISSUES

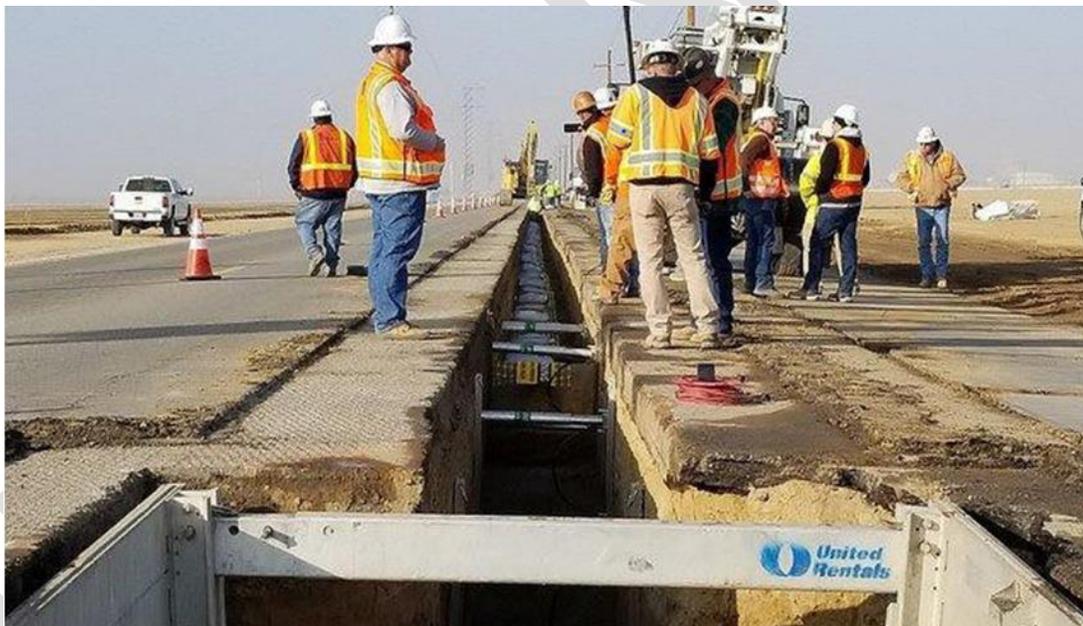
SOCALGAS: SP.8-SC

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



Work gets underway on laying fiber optic cable

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 focused on preparing its system and standards for Renewable Natural Gas, which

EMERGING ISSUES	SOCALGAS: SP.8-SC
------------------------	--------------------------

have been successfully implemented with the production of RNG at the four SB 1383 Dairy Farm pilots in the San Joaquin Valley, for example. 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 connected 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. Efforts will continue to focus on research + development and demonstration projects to fully understand hydrogen blend in a natural gas pipeline system for the development of 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, currently pending before the Commission, 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. 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, review and updates of standards, procedures and specifications for operational readiness in preparation for the introduction of hydrogen blending in our system.

Material Traceability

SoCalGas has implemented an SAP-based material traceability system for tracking pipe, valves, fitting and equipment (PVFE) from the manufacturer to procurement, construction, project closeout and through retirement. The initial phase is focused on large-sized high pressure PVFE and will expand to include the relevant utility PVFE portfolio of materials. In addition, a standardized tracking and traceability level system has been established to aid in verifying that the material traceability requirements for each material are documented and centralized in respective material specifications (MSPs).

Material traceability is the ability to verify the history, installed location, and application of material identification, such as markings, and the retention of records. To validate material traceability, verification points and business controls are utilized for the typical quality management aspects of material procurement and installation. Such verification points and business controls include material inspection, goods receipt and release, fabrication, and performance testing, staging and reconciliation (i.e., return to inventory, scrap, or transfer).

SoCalGas is also one of the first utilities in the nation to expand this effort to include material traceability on Complex Facilities, where these are defined as non-linear assets of all mediums such as compressors, turbines, underground storage, wellheads and other skid assemblies that may also include linear (pipe) and critical auxiliary components. Critical auxiliary components include any component that is critical to the function of high pressure PVFE and would not be able to function without, which may or may not be pressure bearing and may host other mediums (e.g., oil, water, glycol, and electricity) besides natural gas.

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 Rules and Regulations Memorandum Account (GRRMA) to record incremental, substantial, and non-speculative costs imposed by certain amendments by the PHMSA to (1) 49 C.F.R. Parts 191, 192, Pipeline Safety: Safety of Gas Transmission and Gathering Pipelines (GTGS Rulemaking) and (2) 49 C.F.R. Parts 192, 195, Pipeline Safety: Valve Installation and Minimum Rupture Detection Standards (Valve Rule). These new regulations are focused on improving pipeline safety and integrity throughout the U.S.

Examples of significant new or expected upcoming regulations include:

“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.

“Safety of Gas Transmission Pipelines: Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, and Other Related Amendments” Rulemaking

PHMSA published the final rule on August 24, 2022 that added new requirements for pipeline segments in High Consequence Areas (HCA) and non-HCA. Effective May 24, 2023, the applicability of the following summarized requirements is currently taking place:

- Repair criteria (HCA and non-HCA)
- Inspections following extreme events
- Safety features on ILI launchers and receivers

EMERGING ISSUES	SOCALGAS: SP.8-SC
------------------------	--------------------------

- Management of change
- Corrosion control
- Integrity management clarifications
- Strengthened assessment requirements

The final rule establishes new standards for identifying threats, potential failures, and worst-case scenarios from an initial failure through conclusion of an incident. Based in part on recommendations from the National Transportation Safety Board, the rule:

- Imposes new Management of Change process requirements to, for example, avoid a situation where a substandard segment of pipe was substituted without proper authorization;
- Strengthens Integrity Management requirements, including identifying and evaluating all potential threats to pipelines;
- Bolsters corrosion control standards to include surveys for interference of corrosion protection, internal and external corrosion monitoring, and corrosion protection testing;
- Institutes new requirements for inspections after extreme weather events; and expands criteria and expedites timelines for pipeline repairs.

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

PHMSA published the final rule on April 8, 2022 to meet a congressional mandate calling for the installation of Rupture Mitigation Valves (RMV), which are defined as remote-control valves (RCV), automatic shutoff valves (ASV), or equivalent technology, on all newly constructed and entirely replaced gas transmission and hazardous liquid lines. Effective October 5, 2022, these new regulatory requirements include:

- Installation of RMV on pipeline segments with diameter of 6 inches or greater that are newly constructed or “entirely replaced” after April 10, 2023 (“entirely replaced” is defined as replacing two or more miles, in the aggregate, of any contiguous five miles of pipeline during a 24-month period);
- Installation of RMV if risk assessment shows that an RMV is an efficient means to protect an HCA;
- Valve spacing requirements specific for RMV;
- Specifying RMV shutoff capability and methods (isolate ruptured segment as soon as practicable but within 30 min of rupture identification);
- Requiring RMV operational monitoring and maintenance;
- Establishing procedures for rupture identification and response;
- Establishing procedures for notifying and maintaining communication with public safety answering point (i.e., 9-1-1 emergency call center or public safety coordinating agency) following receipt or observation of a potential rupture event; and
- Strengthen incident investigation requirements.

“Pipeline Safety: Class Location Change” Rulemaking

PHMSA is proposing to add an alternative set of requirements operators could 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 IM 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

California Geologic Energy Management Division (CalGEM) Regulations

CalGEM did not enact any new regulations impacting underground storage. The Chemical Inventory and Root Cause Analysis pre-rulemaking regulations initiated in 2021 are currently in draft form and CalGEM expects to publish the final rule in Q1 of 2023. The applicability of the Public Health pre-rulemaking is unknown at this time. The Health Protection Zones proposed emergency regulations is under the Office of Administrative Law review as of December 28, 2022, with an intended effective date no later than January 7, 2023. However, the adoption of the regulations is pending based on the results of the referendum effort to repeal SB 1137.

SB 463 Chemical Inventory and Root Cause Analysis Regulations

This regulation addresses 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 expects to publish the final rule in Q1 of 2023.

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 is scheduled to begin in Summer 2022.

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

EMERGING ISSUES

SOCALGAS: SP.8-SC

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.

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.

The NTSB found that requiring a licensed professional engineer (PE) to seal plans would illustrate that the plans had been approved by an accredited professional with the requisite skills, knowledge, and experience to provide a comprehensive review. Following the Merrimack Valley incident, the NTSB issued urgent recommendations to the State of Massachusetts and NiSource (the parent Company of Columbia Gas) related to professional engineer review and seal/stamping

EMERGING ISSUES	SOCALGAS: SP.8-SC
------------------------	--------------------------

requirements. Both the State of Massachusetts and NiSource developed requirements for PE review that consider project complexity and risk. These changes were found to be acceptable by the NTSB.

Consistent with these models, the Company requires PE review and sealing of the following types of natural gas pipeline work based upon the complexity and relative risk of the work being performed:

Design work for new or replaced DOT-defined transmission pipelines and related facilities

- DOT-T pipelines >100 feet in length
- Taps from an existing DOT-T pipeline to another pipeline
- In-line inspection (ILI) launcher or receiver

Design work for non-standard measurement, regulation & control (MRC) facilities

- Customer Meter Set Assemblies (MSAs) >4" & >60 psig
- Special design district regulator stations
- Pressure limiting stations
- Metering stations
- Producer interconnection points of receipt facilities
- Automated Shut-Off Valves (ASV) and Remote-Control Valves (RCV)

Additionally, qualifying standard and non-standard civil engineering designs in conjunction with all piping and MRC facilities operated by Transmission, Distribution, or Storage Operations requires PE oversight by a licensed civil engineer.

The Company Operations Standard also provides guidelines on the following:

- Modifications to sealed engineering documents prior to or during the course of construction,
- Modifying the work of one PE by another PE
- Signing and sealing of architectural and land surveying work
- Contractor-prepared engineering documents
- Tracking and reconciliation of sealed engineering documents

The policy further incorporates facility designs that are required to be sealed by a PE by an authority having jurisdiction (AHJ) such as a city or municipality, such as traffic control plans. Pre-existing PE approval protocols that were previously established by the Company are also addressed in the new Company Operations Standard. SoCalGas will continue to participate in ongoing dialogues and workshops with the SED as the effort to explore overall state best practices continue.

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.

INTERNAL

EMERGING ISSUES	SOCALGAS: SP.8-SC
------------------------	--------------------------

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		
104.0085	PCB Spill Clean-up and Decontamination		X		
104.0087	Crude Oil Contamination by PCB				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
107.0324	General Operating Instructions for the Metrotech® Model 480B Pipe and Cable Locator - "Split Box"	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
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			

GAS SAFETY PLAN

EMERGING ISSUES
SOCALGAS: SP.8-SC

Gas Safety Plan Chapter						
Policy	Title	4	5	6	7	
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
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

GAS SAFETY PLAN

EMERGING ISSUES
SOCALGAS: SP.8-SC

Gas Safety Plan Chapter						
Policy	Title	4	5	6	7	
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
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		

GAS SAFETY PLAN

EMERGING ISSUES
SOCALGAS: SP.8-SC

Gas Safety Plan Chapter					
Policy	Title	4	5	6	7
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
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			

GAS SAFETY PLAN

EMERGING ISSUES

SOCALGAS: SP.8-SC

Gas Safety Plan Chapter						
Policy	Title	4	5	6	7	
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		
184.0451	Pressure Control: Completion Machine H-17045	X		X		
184.0455	Pressure Control - DH-5 Machine 2" and 3" Insert/Extract	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		

GAS SAFETY PLAN

EMERGING ISSUES
SOCALGAS: SP.8-SC

Gas Safety Plan Chapter					
Policy	Title	4	5	6	7
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
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	

GAS SAFETY PLAN

EMERGING ISSUES
SOCALGAS: SP.8-SC

Gas Safety Plan Chapter						
Policy	Title	4	5	6	7	
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	
187.0140	Transition Fittings	X				
187.0145	Value 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	

GAS SAFETY PLAN

EMERGING ISSUES
SOCALGAS: SP.8-SC

Gas Safety Plan Chapter						
Policy	Title	4	5	6	7	
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			
203.005	Self-Audit Guidelines - Distribution	X		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				
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	

GAS SAFETY PLAN

EMERGING ISSUES
SOCALGAS: SP.8-SC

Gas Safety Plan Chapter						
Policy	Title	4	5	6	7	
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	
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	

GAS SAFETY PLAN

EMERGING ISSUES
SOCALGAS: SP.8-SC

Gas Safety Plan Chapter						
Policy	Title	4	5	6	7	
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
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				

GAS SAFETY PLAN

EMERGING ISSUES

SOCALGAS: SP.8-SC

Gas Safety Plan Chapter						
Policy	Title	4	5	6	7	
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
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				

GAS SAFETY PLAN

EMERGING ISSUES
SOCALGAS: SP.8-SC

Gas Safety Plan Chapter						
Policy	Title	4	5	6	7	
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
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				

GAS SAFETY PLAN

EMERGING ISSUES	SOCALGAS: SP.8-SC
------------------------	--------------------------

Gas Safety Plan Chapter						
Policy	Title	4	5	6	7	
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				

GAS SAFETY PLAN

EMERGING ISSUES

SOCALGAS: SP.8-SC

NOTE: Do not alter or add any content from this page down; the following content is automatically generated.

Brief: Annual Review per California Public Utilities Code Sections 961 and 963 for year 2023.

Document Profile Summary	
Responsible Person:	Bailey, Gary
Published On:	3/31/2023
Last Full Review Completed On:	
Document Status:	Active
Doc Type:	MANUALS
Category (Prior FCD system only):	
If Merged, Merged To Document Number:	
Utility:	SoCalGas
Department:	Safety & Health
Number of Common Document (if applicable):	
Confidential Sections:	
Contains OPQUAL Covered Task:	No
Part of SoCalGas O&M Plan:	No
Part of SDG&E O&M Plan:	No
Last O&M Review date:	
Writer:	Bailey, Gary
O&M 49 CFR Codes & Impacted Sections of Document:	
Part of Non-O&M Parts 191-193 Plan:	No
Non-O&M 49 CFR Codes & Impacted Sections of Document:	
Part of Distribution IMP (DIMP):	No
Part of Transmission IMP (TIMP):	No
Part of Storage IMP (SIMP):	No
Impacts GO112F:	Yes
GO112F Codes & Impacted Sections of Document:	123.2: (k) Entire Doc
Impacts GO58A:	No
GO58A Codes & Impacted Sections of Document:	
Impacts GO58B:	No
GO58B Codes & Impacted Sections of Document:	
Part of CA PUC:	Yes
CA PUC Codes & Impacted Sections of Document:	961: Entire Doc
Impacts New Business Construction:	No
Indices/Binders in Which Document is Filed:	OSP
NOP Learning Module (LM) Training Code:	NOP01986