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SoCalGas

2025 Gas Safety Plan

Safe, Reliable, and Affordable energy delivery today.
Ready for tomorrow.

March 15, 2025

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

March 15, 2025

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 2025 Gas Safety Plan

Dear Mr. Zhang:

Southern California Gas Company (SoCalGas) is pleased to submit our 2025 Gas Safety Plan (Safety Plan). The Safety Plan summarizes our overarching strategy and approach to safety and affirms SoCalGas's commitment to the safety of our employees, the public, our infrastructure, and our contractors.

At SoCalGas, we are dedicated to delivering safe, reliable, and affordable energy. Safety is foundational to our operations, requiring commitment from our leaders, employees, and contractors to ensure gas is delivered safely and reliably to our customers. Simply put, safety defines us both individually and organizationally.

SoCalGas aims to create an environment where employees at all levels, work locations, and departments are encouraged to continuously improve the safety of our operations. Employees are urged to raise safety concerns and stop the job if there are any safety implications associated with a condition, system, or activity. We take pride in our work and we take ownership for safety.

We are committed to continuously enhancing the maturity of our culture and approach to safety. To that end, SoCalGas implements a safety management system (SMS) consistent with American Petroleum Institute Recommended Practice 1173 (API RP 1173) and is engaged in continuous learning and improvement to enhance company safety culture and systems.

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

Sincerely,

Cedric L. Williams
Chief Safety Officer

The table below summarizes the portions of the 2024 Gas Safety Plan that are new or have changed, and are included with this submission:

Chapter	New or Changed Element
Chapter 1- Introduction	• Updated the Introduction
Chapter 2 - Advancing Safety Through Workforce Engagement & Collaboration	• Renamed Chapter 2
Chapter 3 – Advancing Safety Through Safety Systems	• Renamed Chapter 3 • 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 • Added Safety Management System section • Updated Gas Safety Enhancement Programs section • Added Control Room Management Plan section
Chapter 4 – Emergency Preparedness and Response	• Renamed Chapter 4 • Updated Gas Emergency Management Preparedness and Response Policy section
Chapter 5 – State and Federal Regulations	• Updated Figures A and B • Beyond Regulatory Compliance section retitled Beyond State and Federal Regulations
Chapter 6 – Continuing Operations	• Updated Risk Management section • Updated Physical Security section • Updated Cybersecurity section
Chapter 7 – Emerging Issues	• Updated SB 1371 Natural Gas Leakage Abatement title to Natural Gas Emission Reductions • Updated Senate Bill 840 (R.13-02-008) – Biomethane Injection into Common Carrier Gas Pipelines, Renewable Gas Connections and Hydrogen Blending section • Updated Pipeline and Hazardous Material Safety Administration section • Updated Long Term Gas Planning OIR section
Appendix - Safety Policy Documents	• Updated Appendix

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I. INTRODUCTION

This Gas Safety Plan conveys the commitment of SoCalGas's Senior Management Team and outlines the safety plans, programs, policies, standards, and procedures designed to support that commitment. SoCalGas implements and continuously improves upon numerous safety programs, and this plan provides an overview of these efforts and affirms our dedication to safety.

SoCalGas defines safety as the presence of controls for known hazards, actions to anticipate and guard against unknown hazards, and the commitment to continuously improve our ability to recognize and mitigate hazards. Safety requires strong ongoing leadership commitment and active engagement and ownership from all employees. SoCalGas focuses on safety through the lenses of employee safety,[1] public safety,[2] infrastructure safety,[3] and contractor safety.[4] This safety focus is the foundation of our business and helps to organize our efforts around our fundamental core safety value. The Company's tradition of safety spans more than 150 years and is the basis for company programs, policies, procedures, guidelines, and best practices. In other words, safety is who we are, as people and as an organization.

We are committed to safety as foundational to every aspect of our enterprise and central to our vision, mission, and values.

- **Vision:** Delivering energy with purpose – Delivering safe and reliable energy is where we start, not where we end. We deliver our energy with purpose.
- **Mission:** Safe, reliable, and affordable energy delivery today. Ready for tomorrow.
- **Values:** Do the right thing; Champion people; Shape the future

To advance these goals and objectives, we foster a safety culture in alignment with our North Star, *Safer Together*. *Safer Together* advances open communication, curiosity about how we can improve, a commitment to safety success, and collaboration across teams and departments.[5]

[1] Safety systems and processes focused on the health and safety of our employees. This includes safety policies, programs and training.
[2] Safety systems and processes focused on protection of our customers and the public (*i.e.*, emergency management, environmental safety, customer data privacy, accessibility, protection of the public from harm caused by our operations or our assets, and the safety of vulnerable populations).
[3] Safety systems and processes associated with the design, construction, operation, inspection and maintenance of SoCalGas's infrastructure.
[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.
[5] SoCalGas's approach to safety is built upon the company's commitment to continuous improvement, which encourages the endless pursuit of opportunities to learn and improve. To advance this continuous learning and improvement approach, SoCalGas is engaged in efforts to further understand, learn, and improve our safety culture and approach to safety as part of the Safety Culture Improvement Plan filed with the Commission in September of 2024. Available at: https://www.socalgas.com/sites/default/files/2024-09/Attachment_1_SoCalGas_Revised_SafetyCulture_Improvement_Plan_PDFA.pdf

To align our actions, SoCalGas is advancing a comprehensive Safety Management System (SMS) framework that integrates our safety systems and processes. This system supports continuous learning and improvement, enhancing the safe and reliable delivery of service to our customers. The Gas Safety Plan and SMS framework are foundational efforts to detail and align our practices for hazard identification, risk control, continuous learning, leadership commitment, and employee engagement.

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

California Public Utilities Code sections 961 and 963 require each gas corporation in California to develop a plan for the safe and reliable operation of its gas pipeline facilities, subject to approval, modification, and adequate funding by the California Public Utilities Commission (CPUC or the Commission).[6] "In a hierarchy of gas utility documents that communicate its safety program, this gas safety plan is at the top. It conveys the Executive Officer's safety performance expectations, policy principles, and goals/objectives for the gas utility's safety performance."[7] As explained by the Commission, "[t]he 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, using the elements promulgated by [statute] 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."[8]

To comply with the provisions of section 961, operators must "provide opportunities for meaningful, substantial, and ongoing participation by the gas corporation workforce in the development of the implementation 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."[9] In addition, gas system operators must inform their employees that any employee who perceives a breach of safety requirements may inform the CPUC of the breach, and the CPUC will keep the identity of the individual confidential.[10]

Section 956.5 of the California Public Utilities Code requires operators to meet, at least once each year, with each local fire department that has fire suppression responsibilities in the areas where their pipelines are located, to review contingency plans for emergencies involving those pipelines.

2. GAS SAFETY PLAN STRUCTURE

To organize the detailed directives of Public Utilities Code sections 961, 963, and 956.5, the Commission grouped the requirements into five overall topics: (1) safety systems, (2) emergency response, (3) state and federal regulations, (4) continuing operations, and (5) emerging issues. This Gas Safety Plan follows this

[6] See D.12-04-010 at 15 (citing Pub. Util. Code §§ 961 and 963.
[7] D.12-04-010 at 19.
[8] Id at 19.
[9] D.12-04-010 (*quoting* Pub. Util. Code § 963(e)).
[10] Id at 20.

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

3. PLAN REVIEW AND MODIFICATIONS

Public Utilities Code section 961 directs the Commission to require each gas operator to 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.

II. ADVANCING SAFETY THROUGH WORKFORCE ENGAGEMENT AND COLLABORATION

1. STATE DIRECTIVES TO SUPPORT WORKFORCE PARTICIPATION

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

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

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

1. The operator must make its safety plan available to its workforce, and provide for comments and suggestions from the workforce;

2. Gas system operators shall retain a log of the comments and suggestions, including the disposition of the comment or suggestion, with a summary of the rationale for the disposition;

3. Gas system operators shall also inform their employees that any employee who perceives a breach of safety requirements may inform the Commission of the breach, and that the Commission will keep the identity of the employee confidential; and

4. Each gas operator shall provide its workforce with the address of the Director of the Commission's Consumer Protection and Enforcement Division and the designation "Safety Breach Notification from Gas System Operator Employee–Confidentiality Requested" to seek confidential treatment.

2. SOCALGAS EMPLOYEE AND CONTRACTOR SAFETY ENGAGEMENT PROCESS

SoCalGas recognizes that employees are knowledgeable stakeholders and essential safety leaders. Employee and stakeholder engagement is critical to learning about challenges and improvement opportunities, and providing clarity to employees, so that policies, goals, objectives, and procedures are readily understood, effectively implemented, and continuously enhanced.

SoCalGas seeks employee participation to support continuous improvement of this Gas Safety Plan in several ways. First, the Gas Safety Plan is posted on the Company intranet site and is accessible to all employees. The intranet site includes a summary of the plan content, a link to the document, the phone number and address for direct notification to the CPUC of safety concerns in an anonymous manner, and an electronic form for submitting pipeline and occupational safety risks and ideas for improvement. One of the main purposes of the

site is to provide employees a venue for reporting issues outside of the typical supervisor-reporting relationship. Employees can also make reports anonymously and are encouraged to communicate in whatever manner they are most comfortable.

Second, company communications are disseminated to remind employees of the availability of the Gas Safety Plan, how to provide feedback on the Plan, and the importance of reporting known issues and improvement ideas. The importance of reporting safety risks is also included in employee training course materials.

Third, employee feedback, suggestions, and recommendations with respect to safety are sought through multiple platforms and processes to gather and analyze employee safety feedback.[11] These include:

- The Injury & Illness Prevention Program (IIPP) encourages employees to identify risks and elevate them to management.
- Employees are encouraged to report near misses,[12] stop the jobs,[13] and good catches.[14] These employee reports, as well as safety incidents incurred during the week, are posted on SoCalGas's intranet site and distributed by e-mail to be shared with employees at regularly scheduled meetings.
- Employee dialogues and executive base visits offer opportunities for in-person dialogue between frontline employees and SoCalGas executives.
- Engagement surveys and other localized and company-wide survey efforts to gather employee feedback and perceptions.
- Town Halls to share and engage on safety topics and seek input, feedback, and suggestions from employees.
- Meetings and dialogue sessions where employees and local safety committees meet with Executive Safety Council (ESC)[15] members provide important opportunities for senior leadership to hear directly from frontline employees on safety issues.
- Meeting and dialogue sessions where employees meet directly with Advisory Safety Council (ASC)[16] members outside the presence of company leadership provide an opportunity for randomly selected employees to meet with independent safety leaders and experts to ask questions and raise concerns in a confidential manner outside the presence of their leadership.
- Learning Teams as well as Event Learnings include frontline employees to foster broader understanding, improve work processes, and gain insights directly from those performing work to enhance safety and continuously improve.

[11] Concerns are also reported via the Ethics & Compliance Helpline. Safety related issues are flagged for prioritization.
[12] A Near Miss report is when an individual identifies an incident(s) where no injury, illness or damage occurred but there was the potential for injury, illness, or damage.
[13] A Stop the Job report is when someone encounters an unsafe condition or action or is uncertain on how to perform a job and stops work before endangering themselves or others
[14] A Good Catch is the report of an observation, event, or situation that has the potential to cause injury, illness, or damage, but did not occur thanks to timely intervention by an engaged employee or the presence of an effective control
[15] SoCalGas's Executive Safety Council (ESC) provides safety oversight and executive interactions with employees over safety matters. The ESC meets at various operating locations to engage with represented employees, supervisors, and managers associated with an operating district or a region. Employee dialogue sessions are held to provide a forum for employees to share feedback and executives to listen and learn. Issues brought up are discussed and resolved during the dialogue session or carried forward as action items for later resolution, with follow up to the employees who made the suggestion.
[16] In 2020, SoCalGas established an independent Advisory Safety Council to engage the perspectives of external experts as part of our safety journey.

- Annual Employee and Contractor Safety Congresses and District Safety Standdowns across the service territory.
- Meetings between the CSO, Union Leadership and other safety leaders.

In addition, SoCalGas engages with our contractor stakeholders to identify continuous improvement opportunities through safety-related engagements and dialogues. These include meetings focused on job planning, compliance reporting, jobsite inspections and performance data which provide trends and analysis for identifying operational safety concerns in support of continuous improvement.

The reporting and sharing of questions, events, suggestions, and observations provide learning opportunities that help prevent incidents and foster organizational awareness and learning. SoCalGas recognizes that learning is key to improvement and incident prevention, and endeavors to identify systemic improvements with attention to culture, management systems, process conditions, and human factors.

3. CULTIVATING PUBLIC SAFETY BY FOSTERING PUBLIC AWARENESS

SoCalGas cultivates public safety through its Public Awareness Plan.[17] The goal of the Public Awareness Plan is to enhance safety by providing opportunities for exchange of ideas. The plan has executive sponsors, who endorse and provide the necessary resources to achieve the objectives of:

- Enhancing safety through increased public awareness and knowledge sharing;
- Reducing third party damage to pipeline infrastructure; and
- Facilitating greater understanding of effective 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

[17] PA-1 Public Awareness Plan

- Public Officials
- First Responders/Emergency Officials

III. ADVANCING SAFETY THROUGH SAFETY SYSTEMS

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

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

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

SoCalGas implements numerous plans and programs that identify and minimize hazards and systemic risks in pipeline infrastructure and promote employee, contractor, system, environmental, and public safety. These plans and programs are an integral part of our approach to safety and include the following:

Safety Management System (SMS)	SoCalGas established a comprehensive Safety Management System (SMS), consistent with American Petroleum Institute (API) Recommend Practice 1173.
Transmission Integrity Management Program (TIMP)	The TIMP was established in accordance with 49 Code of Federal Regulations (CFR) Part 192, Subpart O, to address safety-related risks on SoCalGas's natural gas transmission system.
Distribution Integrity Management Program (DIMP)	The DIMP was established in accordance with 49 CFR Part 192, Subpart P to address safety-related risks on SoCalGas's natural gas distribution system.
Storage Integrity Management Program (SIMP)	The SIMP was established to mitigate safety-related risks associated with SoCalGas's gas storage system through programmatic risk management processes that comply with 49 CFR § 192.12.
Facilities Integrity Management Program (FIMP)	A FIMP framework was established to mitigate safety-related risks associated with transmission, distribution, and aboveground storage facilities not included in the preceding integrity management programs.
Operation and Maintenance Plan	The Operation and Maintenance (O&M) plan is a compendium of policies designed to comprehensively address the safe operation and maintenance of SoCalGas facilities.
Pipeline Safety Enhancement Plan (PSEP)	The PSEP was established in response to a Commission rulemaking (later codified as Public Utilities Code §§ 957 and 958), that mandated operators to address: transmission pipelines that have not been adequately tested or for which reliable records are not available; pre-1946 pipe that cannot be assess using in-line inspection tools; and valve infrastructure enhancements.

Gas Safety Enhancement Programs (GSEP)	The GSEP are safety-related programs developed and established in response to various safety-related regulations effectuated by PHMSA (e.g., Gas Transmission Safety Rule [GTSR], Valve Rule).
Control Room Management Plan (CRMP)	The CRMP is established in accordance with 49 CFR §192.631 to address safety requirements for controllers, control rooms, and SCADA systems used to remotely monitor and control pipeline operations.

2. SAFETY MANAGEMENT SYSTEM

SoCalGas's Safety Management System (SMS) is a collection of structured, company-wide processes, consolidated into a single system, to provide a risk-based approach to operations though established accountabilities, responsibilities, and continuous improvement. The intent of the SMS is to comprehensively define elements that identify and add rigor, accountabilities, and assurance to the ways risks are managed and to help prevent or mitigate the likelihood and consequences of an unintended incident or injury. The SMS sets the framework for the way safety is managed, aligned with the ten elements outlined in American Petroleum Institute, Recommended Practice 1173.

3. TRANSMISSION INTEGRITY MANAGEMENT PROGRAM

The Transmission Integrity Management Program (TIMP) was developed to enhance pipeline safety through regular assessments and risk mitigation on transmission pipelines, particularly those in high consequence areas (HCAs). Initially developed in 2004 to comply with Subpart O of Part 192 of Title 49 of the CFR and more recently updated to comply with 49 CFR § 192.710, which was newly incorporated through Part 1 of the Gas Transmission Safety Rule,[18] the TIMP is designed to assess and enhance the integrity of transmission pipelines in HCAs and other applicable areas[19] through the identification and evaluation of threats, assessment of material integrity, and determination and implementation of preventive and mitigative actions.

The TIMP integrates information about each transmission pipeline's physical, operating, environmental, and performance history into a comprehensive evaluation. This evaluation is used to develop specific integrity-related assessments and is conducted at intervals no greater than seven years for pipelines in HCAs and no greater than ten years for pipelines subject to 49 CFR § 192.710.

Risk evaluations and subsequent integrity activities for transmission pipeline segments under the TIMP are designed to identify and address safety concerns and are conducted in accordance with federal requirements. SoCalGas uses several methods to assess pipelines, including in-line inspections (ILI), pressure testing, and direct assessment, with ILI being the preferred method due to its generation of comprehensive data sets pertaining to the pipe segments. TIMP assessments support the safe operation of the transmission system through recurring assessment and remediation of pipelines, as well as the incorporation of preventive and mitigative measures, including corrosion control and damage prevention. The TIMP is continuously reviewed and improved to maintain its effectiveness in managing pipeline safety.

[18] 84 FR 52180 – "Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments"
[19] 49 CFR § 192.710(a)

4. DISTRIBUTION INTEGRITY MANAGEMENT PROGRAM

The Distribution Integrity Management Program (DIMP), initially developed in 2010, complies with Subpart P of Part 192 of Title 49 of the CFR. The DIMP is designed to enhance distribution pipeline safety by identifying threats, evaluating and ranking risks, and developing measures to reduce risks on the system.

SoCalGas integrates data from various sources for risk analysis and uses a data-driven approach to develop measures that reduce the likelihood and consequences of distribution pipeline failures. SoCalGas also measures the performance of the DIMP, continually evaluating its effectiveness, and implements improvements as appropriate. In 2024, the DIMP team completed the implementation of a segment-specific quantitative risk assessment methodology to prioritize replacement of higher risk pipeline segments, reducing risk associated with steel and plastic mains by addressing threats such as corrosion and manufacturing defects I

5. STORAGE INTEGRITY MANAGEMENT PROGRAM

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

The SIMP is designed to enhance the safety and integrity of storage wells and reservoirs through recurring assessments of risks and threats and mitigation of potential safety issues. SoCalGas gathers and integrates information on the condition of storage assets and develops models to prioritize risk mitigation. SIMP activities include streamlining data collection, identifying threats, performing risk evaluations, developing preventive measures, and conducting integrity assessments. Related storage activities support risk management, site security, safety, emergency preparedness, and procedural documentation and training to ensure competence in managing storage facilities.

6. FACILITIES INTEGRITY MANAGEMENT PROGRAM

The Facilities Integrity Management Program (FIMP) was developed and implemented based on industry recommended guidelines and practices to enhance the safety of SoCalGas infrastructure not directly addressed under existing integrity management programs. The program includes electrical equipment inspections and mechanical integrity inspections on identified piping, vessels and tanks at aboveground natural gas storage facilities, transmission compressor stations and pressure limiting stations, renewable natural gas facilities, and natural gas vehicle fueling stations. The program also includes electrical equipment inspections at aboveground natural gas storage facilities and transmission compressor stations.

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

7. OPERATION AND MAINTENANCE PLAN

SoCalGas's Operation and Maintenance (O&M) plan comprises over 175 policies designed to address the

safe operation and maintenance of our facilities, in accordance with 49 C.F.R. §192.605, "Procedural manual for operations, maintenance, and emergencies." These policies include, but are not limited to, various processes, such as pipeline operation, corrosion control, record availability, pipeline startup and shutdown, compressor station maintenance, operator qualification, procedure review, excavation safety, and control room management.

This O&M plan includes policies that address, but are not limited to:

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

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

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

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

8. PIPELINE SAFETY ENHANCEMENT PLAN

In 2011, the CPUC 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 in accordance with modern safety standards. In response, SoCalGas and San Diego Gas & Electric Company (SDG&E) submitted their Pipeline Safety Enhancement Plan (PSEP). PSEP is a systematic effort to test or replace transmission pipelines that do not have sufficient documentation of a pressure test to at least 1.25 times the Maximum Allowable Operating Pressure (MAOP). PSEP employs a risk-based prioritization methodology and includes replacement of pre-1946 pipe that cannot be assessed using in-line inspection tools, and enhancement of valve infrastructure.

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

PSEP's key elements include:

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

PSEP also includes measures to enhance the pipeline system through retrofitting pipelines and valves with existing and emerging technologies to provide advance warning of a potential pipeline failure and decrease the time to identify, investigate, prevent, remediate, or manage the effects of such an event. SoCalGas is continuing to progress the implementation of PSEP through the application of prudent oversight, project execution, and proactive cost management measures.

9. GAS SAFETY ENHANCEMENT PROGRAMS

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

- **Pipeline Safety: Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments Final Rule**
  PHMSA published the final rule on October 1, 2019. With various parts taking effect July 1, 2020, and July 1, 2021, the rule strengthened record-keeping requirements and added entirely new sections to the code that require operators to reconfirm pipeline maximum allowable operating pressure (MAOP) for pipeline segments without traceable, verifiable, and complete records; establish an opportunistic material properties and attributes verification procedure; and expand integrity assessment requirements beyond segments in HCAs. Requirements associated with and/or impacting the TIMP are discussed in section III.3. of this plan. Additionally, SoCalGas proposed an Integrated Safety Enhancement Plan (ISEP) in the TY 2024 GRC application to incorporate the MAOP reconfirmation requirements of this rule with the directive of Ordering Paragraph 15 of D.19-09-

051.[20]

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

- **Pipeline Safety: Requirement of Valve Installation and Minimum Rupture Detection Standards Final Rule**
  PHMSA published a final rule on April 8, 2022, which went into effect on October 5, 2022. The rule requires operators to install rupture mitigation valves (RMVs) on newly constructed or "entirely replaced" transmission pipeline segments with diameters of six inches or greater and perform risk analyses annually to identify RMV installation opportunities. Additionally, the rule requires operators to strengthen incident investigation requirements and establish procedures for rupture identification and response measures, as discussed in Section IV of this plan.

10. CONTROL ROOM MANAGEMENT PLAN

On December 3, 2009, PHMSA published the Control Room Management/Human Factors final rule in the Federal Register as 49 CFR §192.631, *Control Room Management*, which went into effect on February 1, 2010. These safety regulations prescribe safety requirements for controllers, control rooms, and SCADA systems used to remotely monitor and control pipeline operations.

In response, SoCalGas submitted its Control Room Management Plan (CRMP) in 2010 to comply with 49 CFR §192.631. The CRMP aims to enhance the performance reliability of operator personnel that control pipeline operations by:

- Defining the roles and responsibilities of controllers and providing controllers with the necessary information, training, and processes to fulfill these responsibilities.
- Implementing methods to prevent and manage controller fatigue according to an established fatigue management plan.
- Managing SCADA alarms and controller workloads according to an established alarm management plan.
- Integrating human factors management into SCADA systems.
- Testing backup SCADA systems and internal communication plans periodically to verify effectiveness of procedures and equipment if an emergency involving loss of SCADA system

[20] See D.19-09-051 at 780 wherein the CPUC ordered SoCalGas to file a re-testing implementation plan for transmission pipeline segments that were strength tested in accordance with then-applicable pressure testing standards for which records do not satisfy the requirements of 49 CFR §192.619 (modern strength testing standards). The re-testing plan was ordered to include six elements, including the identification of pipelines for which SoCalGas recommends or does not recommend a re-test (or electing not to re-test) and an evaluation by an independent engineer that SoCalGas's proposed determination of which pipelines to re-test or not re-test reflects reasonable engineering judgment.

functions occur.
- Assuring control room considerations are taken into account when changing pipeline equipment or configurations.
- Reviewing reportable incidents or accidents to determine whether control room actions contributed to the event.
- Developing team training that provides controllers, and those who operationally collaborate with control room personnel, the skills necessary to address conditions that could occur in any operational mode (normal, abnormal, or emergency conditions).

The CRMP is reviewed annually and is updated throughout the year based on new regulations, revised company policies, internal and external audits, and other items that drive improvement. Training programs are also reviewed and updated in the same timeframe, so employees are aware of and perform tasks safely and according to the current requirements.

In addition to this, SoCalGas has pursued its Control Center Modernization (CCM) project designed to drive operational improvements and safety enhancements by developing a comprehensive, real-time view of the overall gas system by further digitalizing and integrating the company's Distribution, Transmission, and Storage gas networks through enhanced remote monitoring, control, and analytic capabilities across all assets. CCM initiatives include the following:

- Building a new and modernized gas operations control center facility with expanded functionality such as:
  - A larger control room with robust data visualization capabilities.
  - Increased server/storage needs.
  - A SCADA simulator for operational training.
- Expanding Gas Control's remote monitoring and control capabilities by integrating the following Pipeline Facility assets into the SCADA system:
  - Distribution Regulator Stations.
  - Electronic Pressure Monitors that monitor Distribution Pressure Zones and Pressure Districts.
  - Fiber Optic Cables along select pipeline to identify third party intrusion, leaks, and ground subsidence.
  - Methane Sensors installed in "High Consequence Areas" to identify potential leaks and pipeline ruptures.
- Enhancing control room technological capabilities such as
  - Upgrading the SCADA system to improve stability, security, and functionality for control room operations.
  - Developing an extensive electronic logging system to support operational and compliance requirements.
- Developing an advanced data analytics platform that leverages machine learning and artificial intelligence capabilities to increase situational intelligence of the gas pipeline system. Increasing Gas Control and SCADA department staffing to accommodate the additional monitoring responsibilities and system maintenance of new technologies.

Through these and other CCM enhancements, Gas Control processes will be modernized, enhancing the safety and efficiency across SoCalGas operations.

IV. EMERGENCY PREPAREDNESS AND 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'S COMPREHENSIVE APPROACH TO EMERGENCY RESPONSE

SoCalGas employs a comprehensive emergency response approach, continually refining programs, policies, standards, and procedures to address leaks, hazardous conditions, and emergencies like earthquakes, fires, or mudslides. This holistic strategy includes communication, preparedness, incident response, training, outreach, and mutual assistance, fostering a proactive and coordinated approach to safety.

SoCalGas uses Emergency Management communications for swift response and awareness, with industry leading outage and threat detection software providing alerts for events impacting employees, customers, or facilities. Written plans, including the Emergency Management Preparedness and Response Policy, guide employees to respond safely and prioritize protection. Business Continuity Plans support operational stability during and after emergencies.

SoCalGas follows the FEMA Incident Command System (ICS) for effective communication, coordination, and cooperation within the company and with external agencies. Regular emergency preparedness exercises and drills, involving external agencies, validate plans and identify improvement opportunities. The effectiveness of the response is evaluated through continuous improvement surveys and after-action reports.

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

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

3. THE GAS EMERGENCY MANAGEMENT PREPAREDNESS AND RESPONSE POLICY

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 infrastructure 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 practices detailed in API 1173, and complies with the Public Utilities Code sections 961(d)(5), (6) and (8), as well as the emergency response procedures required by 49 C.F.R. §§ 192.613 and 192.615. It documents how the Company prepares and responds to emergencies by using the Plan-Do-Check-Act (PDCA) cycle for continuous improvement of our processes.

This plan covers the following emergency response elements:

- Prevention and Protection
  - Curtailment Process
- Preparedness
  - Policies and Procedures
  - Exercises and Drills
  - Training
  - Business Continuity Planning
  - Facility Emergency Action and Fire Prevention Plan
  - Emergency Food and Water
  - External Stakeholders' Engagement Outreach
- Response
  - Emergency Management Response Organization
  - Emergency Management Communications
  - Emergency Operations Centers
  - On-Call Responsibilities
  - Watch Desk
  - Employee Reporting Instructions During Natural Disasters or Major Emergencies
  - Mutual Assistance
  - Potential Emergency Threats and Hazardous Conditions
- Recovery
  - After Action reports
  - Post-Event Debriefs
- Enabling Technologies

With PHMSA's amendment to 49 CFR Part 192 through the "Pipeline Safety: Requirement of Valve Installation and Minimum Rupture Detection Standards" final rule on April 8, 2022, ER-1 has been updated to increase coordination with emergency response agencies to enhance public safety and minimize

environmental impacts of pipeline ruptures. Additionally, in alignment with the amendments to 49 CFR § 192.613, ER-1 includes procedures for the following activities following an extreme weather event or natural disaster that has the likelihood of damage to pipeline facilities.

V. STATE AND FEDERAL REGULATIONS

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

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

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

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

2. REGULATORY OVERSIGHT

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

California's rules for gas transmission and distribution piping systems are specified in General Order 112-F, which incorporates 49 CFR Parts 191, 192, 193, and 199.

SoCalGas's storage wells are also operated under PHMSA and CalGEM regulations. CalGEM, certified by PHMSA, handles inspection and enforcement of natural gas storage.

This Gas Safety Plan and related documents align with General Order 112-F and the applicable parts of Title 49 of the CFR. SoCalGas's gas standards, including O&M procedures, are developed to maintain and improve safety, complying with federal and state regulations. Both the Pipeline Safety & Compliance team and the Integrity Management & Strategic Planning team monitor and track changes to legislation and regulations, coordinating the implementation of new requirements.

SoCalGas stays current with regulations by monitoring legislative activities and participating in industry associations like the American Gas Association (AGA). The company updates procedures, standards, and audit programs, maintaining required documentation to demonstrate compliance.

SoCalGas will continue to comply with regulations, identifying, evaluating, and reducing system risk through continuous safety enhancements.

3. COMPLIANCE WITH GENERAL ORDER 112-F

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

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

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

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's transmission and distribution pipelines and facilities are to be constructed in accordance with these requirements.

3.3 Installation: 49 CFR Part 192, Subpart H specifies the minimum requirements for the installation of distribution service lines, service regulators, and customer meters. These requirements include specifications pertaining to the location of this infrastructure, protection from damage, and valve requirements. SoCalGas's service lines, service regulators, and customer meters are to be installed in accordance with these requirements.

3.4 Maintenance: 49 CFR Part 192, Subparts M and I specify the minimum requirements for the maintenance of transmission and distribution pipe facilities along with the associated corrosion protection facilities. Maintenance activities include the patrolling of pipeline, performing leakage surveys, monitoring performance of corrosion protection systems, making repairs, inspection and testing of pressure limiting and regulating equipment, and valve and vault inspection and upkeep. SoCalGas maintains its pipelines and facilities in accordance with these requirements.

3.5 Operations: 49 CFR Part 192, Subparts L and K specify the minimum requirements for the operation of

transmission and distribution pipeline facilities. Operational activities are included in the O&M plan described in Chapter 4 and included the Emergency Response Plan described in Chapter 5 of this Gas Safety Plan. The operation of the pipeline also includes requirements for a public awareness program, damage prevention program, control room management procedures, odorization of gas, identification of changes in population density along certain transmission lines, and the determination of maximum allowable operating pressure, including requirements for increasing the maximum allowable operating pressure.

4. BEYOND STATE AND FEDERAL REGULATIONS

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

Table 1: List of Industry Participation

- American Gas Association
- Gas Piping Technology Committee
- Center for Hydrogen Safety
- American National Standards Institute
- The American Petroleum Institute
- American Society of Civil Engineers
- The American Society of Mechanical Engineers technical committees (B31Q, B31.3 B31.8, B31)
- California Accidental Release Prevention (CAL ARP) seismic committee
- California Regional Common Ground Alliance
- California Utilities Emergency Association
- Common Ground Alliance
- Dig Alert (Southern California one-call)
- The Gas Technology Institute
- Inter-Utility Coordination Committee
- Inter-Utility Working group
- The Association for Materials Protection and Performance
- NYSEARCH – National Gas RD&D
- USA North 811 (Northern California and Nevada one-call)
- Pipeline Association for Public Awareness
- Pipeline Research Council International
- The Western Energy Institute
- Construction Safety Research Alliance

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

Figure A: List of Activities from Industry Group Participation

Current Activities	
Industry Actions	**Implementation Type & Responsible Organization**
Residential Methane Detection (RMD) pilot has completed the deployment of approximately 400 methane sensors utilizing SoCalGas's Advanced Meter communication systems to provide alarms and other notifications when methane-in-air- concentration levels exceed the pre-set acceptable limits at the installation site	In progress Gas Engineering/Customer Services
Research, Develop and Demonstrate technologies leveraging aircraft systems (manned and unmanned), to conduct various types of Pipeline/Facility inspections and/or surveys to improve safety in remote or difficult-to-access pipeline segments or as incremental activities.	On-going Research and Materials Strategic Programs
Mature material manufacturer assessments by enhancing the methodology and centralizing the process behind manufacturer selection to promote consistency, improve material traceability, and reduce risk.	In Progress Gas Engineering – Material Quality Management
Mature the TIMP Direct Examination process to produce results compatible with an Engineering Critical Analysis approach to defect assessment.	In Progress Integrity Management
Edison Electric Institute's (EEI) development of a Safety Classification and Learning (SCL) Model to track SIF Potential and promote learning and improvement	On-going Safety Management Systems

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

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 outreach and engagement	Adopted Gas Operations - Policies Tools & Strategies

Industry Actions	Implementation Type & Responsible Organization
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 the DIMP, evaluate risk associated with trenchless pipeline techniques and implement initiatives to mitigate risks.	Adopted Sewer Lateral Inspection Program Gas Operations Support
Under the DIMP, identify distribution assets where increased leak surveys may be appropriate.	Adopted Integrity Management
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 Integrity Management
Incorporate an Incident Command System (ICS) type of structure into emergency response protocols.	Adopted Emergency Management
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 updated meter set protection practices including improved data management.	Adopted Gas Infrastructure Protection Program (GIPP) Gas Operations Support
Upgrades for aging equipment used to locate underground pipelines and facilities have been purchased and deployed. The standardized training has been developed and completed.	Adopted Gas Operations Services
Utilize algorithms in SoCalGas's 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
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

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Industry Actions	Implementation Type & Responsible Organization
Computer program to evaluate surface loads on buried pipes was validated by PRCI field tests. Program is used to evaluate temporary and permanent loads on our buried pipes.	Adopted Gas Engineering
Computer program to evaluate lifting pipe along a trench to ensure the pipe is not being overstressed during installation.	Adopted (for special cases) Gas Engineering
Computer Program to evaluate piping stresses at river crossings.	Adopted Gas Engineering
811 Ambassador program empowers all employees with the knowledge and an efficient process to report a worksite that may not have an 811 ticket. Each report is investigated by the Damage Prevention team and jobs are stopped when unsafe excavation is confirmed thus preventing an excavation damage to the pipeline.	Adopted System Wide
Engineering deliverables that meet certain criteria for DOT-T pipelines and non-standard measurement, regulation, and control designs shall be prepared under the responsible charge of a Professional Engineer (P.E).	Adopted Gas Engineering, Transmission, Construction, Distribution, Storage

VI. CONTINUING OPERATIONS

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

In D.12-04-010, the Commission identified the topic of "continuing operations" to meet the requirements in Public Utilities sections 963(b)(3) and 961 (d)(3), (d)(4), and (d)(10). These sections require that SoCalGas's 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 transmission, distribution, and storage system to meet Commission standards for both core and noncore customers. The system is designed to provide continuous service to core customers' forecast demand during a 1-in-35-year peak day event, during which noncore service is curtailed, and to all customers' forecast demand during a 1-in-10-year cold day event. The transmission system is also designed and operated to maintain sufficient receipt capacity for interstate gas supplies under a 1-in-10-year cold-and-dry year annual average forecast of demand.

The Gas Transmission Planning and Distribution Engineering departments monitor customer demand using service requests and long-term demand forecasts. Detailed hydraulic models are used to evaluate capacity and identify necessary improvements, especially during peak winter usage. Changes in demand are assessed against CPUC-mandated standards, and capacity deficiencies are addressed through Commission-approved means, expanding system capacities (transmission, distribution, and/or storage) as necessary.

SoCalGas's Utility Gas System Operator continuously monitors the system throughout the day and maintains system reliability and integrity per SoCalGas Gas Rule No. 41. This rule outlines the responsibilities of various SoCalGas departments that contribute to system operation and reliability.

SoCalGas will continue its operating and maintenance activities, making capital investments to support the pipeline system, enhance storage operations, improve safety, and comply with regulatory and environmental regulations.

3. SOCALGAS WORKFORCE SIZE, TRAINING AND QUALIFICATIONS

3.1. Workforce Size

SoCalGas considers multiple factors to determine appropriate staffing levels for the safety and reliability of its gas delivery system. This involves workforce planning, knowledge transfer, training, and succession planning.

Annual baseline staffing levels are set during the business planning process, with a mix of employees and contractors to address work demand variability. Management evaluates workforce needs against safety, compliance, maintenance, and construction obligations. If needs arise, local managers can request additional resources, which are addressed through the resource allocation process. Staffing levels are verified by monitoring performance metrics and workloads.

Employees in safety-sensitive positions are trained for emergencies and cross-trained for flexibility. Workforce requirements are assessed continuously to develop hiring and development plans, ensuring system safety and reliability.

Contractors are used as needed, complying with collective bargaining agreements. They undergo training and meet compliance requirements, monitored through ISNetworld to ensure they adhere to company standards

3.2. Field Operations Training

Field Operations Training classes introduce new employees to SoCalGas's culture and safety practices. Follow-up refresher training classes are available to all employees. These classes reinforce the importance of safety for all training employees, emphasizing that safety is everyone's responsibility. Employees are encouraged to take the initiative and Stop the Job if they have any safety concerns. The primary goal is to develop a skilled, competent, and safety-focused workforce. Additionally, employees are given opportunities to ask questions and provide feedback on the effectiveness of the training.

Training courses, varying from two to 12 weeks, are facilitated by a centralized team of subject matter experts, and rooted in Gas Standards. They include Operator Qualification tasks as required by 49 CFR Part 192, with documentation closely monitored and employees re-trained as needed. Emergency response training is provided for relevant classifications, ensuring employees understand guidelines and procedures.

SoCalGas engages in industry forums to ensure training activities comply with regulations and to discover new training opportunities. Training materials are regularly updated, incorporating root causes of safety incidents and near-miss investigations to improve overall safety.

Supervisors receive extensive training to support safety operations and a healthy safety culture. New supervisors complete a five-month onboarding program, including the Safety Essentials for Supervisors course. In 2025, front-line supervisors will expand leadership development through Leadership Catalyst (established in 2024), a one-day experience focused on building a healthy safety culture and advancing a learning mindset.

3.3. Qualification of Pipeline Personnel

The purpose of Operator Qualification is to support the safe transport of hazardous gases through our pipelines. Gas pipeline operators must have a written Operator Qualification program to comply with Subpart N of Part 192 of Title 49 of the CFR. This program applies to all individuals performing covered tasks, whether they are employees, contractors, or subcontractors.

Employees must be trained, initially qualified, and re-qualified every three or five years, depending on the task. SoCalGas records evaluation results to demonstrate employees' knowledge, skills, and abilities. Employees who do not pass are re-trained and re-qualified before performing the task again. Evaluations can also occur due to significant errors during operations. All employees performing covered tasks must be qualified.

Contractors' knowledge, training, and skills must also meet job requirements. An external vendor, a leader in regulatory compliance, provides training, testing, Operator Qualification, and record retention for our pipeline contractors.

4. DRUG AND ALCOHOL MISUSE PREVENTION PLAN

The purpose of the Drug and Alcohol Misuse Prevention Plan is to reduce accidents associated with the use of controlled substances and alcohol, thereby minimizing fatalities, injuries, and property damage. The Company’s plan and policies aim to enhance safety, prevent accidents, and comply with state and federal regulations.

Employees performing DOT-covered functions, 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.

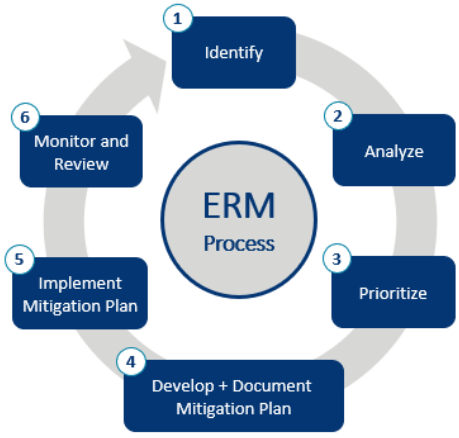
5. RISK MANAGEMENT

5.1. Enterprise Risk Management

SoCalGas’s Enterprise Risk Management Framework (ERM), modeled after International Organization for Standardization (ISO) Standard 31000, is designed to create and protect long-term value for our customers, employees, shareholders, and the communities we serve. The ERM Framework incorporates a formalized governance structure to integrate and align risk management practices across the enterprise and foster appropriate communication and collaboration throughout the Company. Both leadership and subject matter expert input is incorporated into the ERM Framework to drive risk-informed business decisions and resource allocations, and monitor identified and emerging risks and mitigation plans to foster continuous improvement and achieve Company objectives.

This governance structure supports the implementation of various qualitative and quantitative risk assessment processes and tools for risk analysis. A key component is the six-step ERM Risk Assessment process summarized in the figure below, which the Company utilizes to effectively identify, prioritize, manage, mitigate, and monitor enterprise risks. The prioritization of enterprise risks is based on an

assessment of the likelihood of the risk event occurring, the potential consequence of the risk event and controls or mitigations in place to either prevent the occurrence of the event or mitigate the consequences should the event occur.



The Risk Management department is integral to this process, working in close collaboration with senior leadership, management, and employees to proactively identify potential threats and opportunities, assess and prioritize risks, implement mitigation efforts, and engage in assessments and reviews to advance risk mitigation effectiveness. This collaborative approach enables the results of the risk management process to inform decision-making and resource planning across the organization.

Effective risk management practices reinforce a strong and positive safety culture and are integral to SoCalGas's thoughtful and measured approach to adopting risk management structures and processes at all levels. This commitment continually advances the development of a risk-aware culture, as the ERM practices and processes are actively utilized by various operational and functional departments to identify safety risks, thereby serving as a critical component of SoCalGas's Safety Management System (SMS).

5.2. Enterprise Asset Management

SoCalGas implements an Enterprise Asset Management (EAM) program that consolidates, cleanses and geospatially aligns asset data to build capabilities around asset analytics and decision making through advanced technologies, business process changes and improved definition around roles and responsibilities. This program increases the knowledge and accountability of asset owners through a more robust and comprehensive operating model that aligns to SoCalGas's strategic objectives. This operating model is designed to support a risk-informed value framework to operationalize data-driven long-range operations strategy on all assets across the enterprise. EAM is intended to improve safety, integrity, transparency, and availability of asset records by integrating asset data for advanced analytics and leveraging reliable asset data for data-driven asset investment management.

SoCalGas has implemented a technology solution for data–driven, risk-informed asset investment management (AIM). The AIM program progression focuses on building the technology to support a selected group of asset types with the aim of broadening the program to cover enterprise-wide assets. The program follows a maturity model to improve asset data ingestion, data quality and consistency on project valuation processes. The technology utilizes a common value framework that aligns business decisions on

assets with SoCalGas strategic objectives. It achieves this by standardizing metrics to a common scale, monetizing risk reduction, and quantifying benefits gained. Furthermore, the implementation of asset investment management technology and changes in business processes enable long-term, multiyear capital planning by utilizing a benefit-cost ratio approach to justify current and future investments.

6. PHYSICAL SECURITY

As a result of growing security threats and the evolving sophistication of adversary attacks, the physical security program is regularly assessed to validate strategic direction and improve alignment with current industry best practices. Our Corporate Security team works collaboratively with the SoCalGas Safety program to mitigate potential physical threats and maintain a safe work environment. Physical security is designed to protect personnel and physical assets. Corporate Security supports the SoCalGas mission by assisting in the management of physical security risks, enabling risk informed decisions, and proactively adapting to evolving threats and changing business needs. Corporate Security is responsible for the development and management of physical security programs and policies, including physical security controls, security assessments, investigations, and workplace violence mitigation.

Key responsibilities include:

- Investigations
- Access Management
- Regulatory Compliance
- Emergency Response
- Facility Monitoring
- Contract Guard Services
- Security Training
- Security Reviews & Vulnerability Assessments
- Risk & Intelligence Analysis
- Law Enforcement Liaison

Assessments and improvements occur through participation in security events, including detailed discussions and site-specific tabletop exercises, GridEx, the American Gas Association, and the US Department of Homeland Security's Transportation Security Administration. Under closely supervised conditions, these discussions and simulations identify opportunities for improvement that have been prioritized for mediation as part of a continuous improvement strategy for risk mitigation.

7. CYBERSECURITY

The Cybersecurity department oversees the management of cybersecurity risks for both Information Technology (IT) and Operational Technologies (OT).

The services provided by the Cybersecurity organization are focused on maintaining and improving the Company's security posture in an environment of increasing threat capabilities. Cybersecurity continues to support technology innovations and enhancements within the business by reducing both the likelihood and potential impact of cybersecurity incidents to all business areas within SoCalGas, SDG&E, and Corporate Center while balancing costs and applying prioritized risk management. Additionally, the department supports enterprise cybersecurity capabilities and provides cybersecurity training and awareness to all users so that they can perform their functions safely, reliably, and securely.

CONTINUING OPERATIONS	SOCALGAS: SP.6-SC

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

The Cybersecurity program utilizes cybersecurity and risk management frameworks, including but not limited to the NIST Cyber Security Framework (CSF), Center for Internet Security (CIS-20), NIST 800-53, and MITRE ATT&CK framework. Additionally, the Companies comply with applicable laws and regulations both at the State and Federal level.

VII. EMERGING ISSUES

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

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

2. SOCALGAS MONITORING OF EMERGING ISSUES

SoCalGas stays current on emerging issues within the industry through active participation in industry associations, review of PHMSA advisory bulletins, and open communication with legislative, regulatory groups as well as news and trade publications.

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
- Natural Gas Emissions Reductions
- Energy Resiliency
- Climate Change
- Enhanced Use of Satellite and Aerial Monitoring for Damage Assessments
- Optical Pipeline Monitoring System for Pipeline Damage Prevention and Leak Detection
- Renewable Gas Connections, and Hydrogen Blending
- Proposed modifications to PHMSA Regulations
- Proposed revisions to CalGEM Regulations
- Long-term Gas Planning OIR

Safety Culture OIR

As part of a Rulemaking (R.21-10-001) the CPUC approved a Safety Culture Assessment framework in January of 2025, which includes a comprehensive assessment of each IOU's safety culture, conducted once every four years, and an annual self-evaluation in the three intervening years to monitor improvement. The comprehensive assessments will be conducted by a third-party independent evaluator. The self-evaluations will be conducted by the individual utility. Also adopted is a utility safety culture working group to foster collaboration and enhance safety culture improvement efforts between IOU's, CPUC, and stakeholders. SoCalGas continues to participate and collaborate with the CPUC and stakeholders to foster advancements in safety culture.

Natural Gas Emissions Reductions

SoCalGas has a longstanding commitment to reducing natural gas emissions. The company 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 special optical cable that detects methane leaks and third-party damage to pipelines;
- Use of "point" sensors that can identify leaks before they can be detected 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.

Energy Resiliency

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

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

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

SoCalGas continues to conduct research to understand possible impacts to its system during extreme events and to better identify potential vulnerabilities and opportunities to enhance resiliency for the gas infrastructure.

Climate Change

On April 26, 2018, the California Public Utilities Commission (CPUC) initiated the Order Instituting

Rulemaking (OIR) R.18-04-019 to consider strategies and guidance on climate change adaptation for energy utilities and promoted efforts to ensure the provision of reliable and resilient service to customers particularly to disadvantaged and vulnerable communities (DVCs). California investor-owned utilities (IOUs) are required to conduct a Climate Adaptation Vulnerability Assessment (CAVA) and a Community Engagement Plan (CEP) every four years, at a minimum, and their analyses must reflect the best available science. The Proposed Decision (D.20-08-046) was issued in September 2020.

On August 1, 2024, the CPUC issued a decision to update climate change adaptation modeling requirements and refine the climate adaptation and vulnerability assessments. It established the Shared Socioeconomic Pathway (SSP) greenhouse gas emissions scenario 3-7.0 as the reference scenario for energy utility use in the CAVA, adopted the Global Warming Level approach as the basis of CAVA planning in lieu of the targeted years approach, and updated the timing of CAVA submittal for the next cycle. The first CAVA report will be filed at the same time as the utility's Risk Assessment and Mitigation Phase (RAMP) application. Moving forward the CAVA will be filed a year in advance of the RAMP application filing and every four years thereafter. CAVA will be used to inform RAMP and the GRC. SoCalGas submitted its Community Engagement Plan (CEP) in 2024, and will submit its CAVA in 2025 and its General Rate Case (GRC) documentation in 2026. The present SoCalGas CAVA addresses the requirements of the CPUC Climate Adaptation OIR rulings and industry best practices for assessing physical climate risks. The methodology uses forward-looking climate science information applied to the gas system, and relies on a combination of climate exposure, infrastructure sensitivity, vulnerability, and adaptative capacity scores to derive climate change risk scores. The results of CAVA serve primarily to identify assets at moderate- to high-risk to climate hazards that could impact safe and reliable service and identify adaptation options that may be considered.

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 and/or ground movement. These images, paired with internal Geographic Information System (GIS) data and infrastructure maps, help identify potential impacted infrastructure due to the winter/rainy season. SoCalGas has also implemented the use of Unmanned Aerial Vehicles (UAVs, aka drones) that provide high-definition aerial imagery and three-dimensional topographic modeling to support damage assessments in these types of incidents.

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

Optical Pipeline Monitoring System for Pipeline Damage Prevention and Leak Detection

SoCalGas installed Optical Pipeline Monitoring System (OPM) to enhance and support safety by helping to identify potential leaks, ground subsidence, and help prevent third party dig-ins by detecting vibration from encroachments. The system has been installed in the San Joaquin Valley, at certain creek crossing locations in Santa Barbara County and along sections of pipeline in San Bernardino County. SoCalGas will continue to install optics and expand on this program as construction projects that meet certain requirements are developed.

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

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

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

SoCalGas is also on the forefront of exploring various methods of introducing hydrogen blends into its gas system while maintaining safety and reliability. SoCalGas is an active member of the Center for Hydrogen Safety (CHS), a global non-profit dedicated to promoting hydrogen safety and best practices. SoCalGas's involvement consists of chairing the hydrogen-natural gas blending working group within CHS, whose efforts include developing best safety practices of blending for industry.

Efforts will continue to focus on research and development and demonstration projects to fully understand hydrogen blends in a natural gas pipeline system for the development of a Hydrogen Injection Standard, as requested by the CPUC as part of the Biomethane OIR-Phase 4 Ruling. On March 1st, 2024, SoCalGas, SDG&E, Southwest Gas, and PG&E (all four gas-IOUs) filed an amended application which proposed hydrogen blending demonstrations from 5-20% hydrogen by volume in (1) isolated polyethylene plastic distribution pipeline systems, and (2) isolated mixed material (steel and plastic) distribution systems within SoCalGas's, SDG&E's, and Southwest Gas' respective territories. The amended application also included (1) a hydrogen blending demonstration project from 0.1% to 5% hydrogen by volume in a simulated open portion of the SoCalGas's distribution system, and (2) a hydrogen blending demonstration in a transmission system test loop in PG&E's service territory. The proposed hydrogen blending demonstration projects, if approved, will generate crucial information and knowledge with the goal of informing the development of a safe hydrogen injection standard for the state. In addition to the development of the hydrogen injection standard, SoCalGas will review and update relevant standards, procedures and specifications for operational readiness in preparation for the demonstration projects, and for introduction of hydrogen blending in its system.

SoCalGas's safety efforts for its hydrogen blending demonstration projects involves initiating, implementing, and completing protocols such as providing hydrogen safety education for personnel directly or indirectly associated with the projects and developing any necessary emergency response plans. Furthermore, safety assessments are conducted along with testing, leak surveys and methane/hydrogen monitoring. Mitigation measures are also incorporated throughout the process and are very effective in safe-guarding hydrogen-blending projects.

Pipeline and Hazardous Material Safety Administration (PHMSA) Regulations

As significant and new federal safety regulations develop, SoCalGas continues to provide regulatory input

to assist in effective implementation and desired outcomes that affirms SoCalGas's commitment to safety. In conjunction with new PHMSA regulations, SoCalGas has been authorized to establish the Gas Safety Enhancement Programs Memorandum Account (GSEPMA) to record incremental, substantial, and non-speculative costs imposed by PHMSA's amendments to the CFR.[21]

These new regulations are focused on improving pipeline safety and integrity throughout the country and are primarily driven by the "Protecting our Infrastructure of Pipelines Enhancing Safety" (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 respond to incidents
- 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
- New regulations for idled natural or other gas transmission and hazardous liquid pipelines

Examples of significant new and upcoming rulemakings include:

"Leak Detection and Repair" Rulemaking	The "Pipeline Safety: Gas Pipeline Leak Detection and Repair" Notice of Proposed Rule Making (NPRM) was issued by PHMSA on May 5, 2023. In response to the PIPES Act of 2020 and in support of the Biden-Harris Administration's U.S. Methane Emissions Reduction Action Plan, the proposed regulatory amendments in the Gas Pipeline Leak Detection and Repair Rule are intended to reduce both intentional and unintentional greenhouse gas emissions. Operators must develop an advanced leak detection program (ALDP) with a list of leak detection technologies and practices re-evaluated on a periodic basis. This includes leak grading and repair criteria, increased leakage survey and patrolling frequency, failure investigation requirements, and design, configuration, and maintenance requirements to eliminate leaks and minimize releases of gas. Additional regulatory revisions emphasize public safety and environmental safety from all hazards. PHMSA submitted a pre-publication of the final rule on January 17th 2025, but promptly withdrew the rule as a result of the Regulatory Freeze Pending Review executive order.[22] SoCalGas continues to monitor activity related to this rulemaking.
"Safety of Gas Distribution Pipelines and	The "Pipeline Safety: Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives" NPRM was issued by PHMSA on August 24,

[21] D.24-12-074, Ordering Paragraph 10(e)
[22] 90 FR 8249

Other Pipeline Safety Initiatives" Rulemaking	2023. PHMSA is proposing regulatory amendments that will require operators of gas distribution pipelines to update their DIMP; emergency response plans; operations and maintenance manuals, including the expansion of MOC to the distribution system and associated activities, as well as the introduction of traceable, verifiable, and complete record-keeping for distribution pipeline systems; and other safety practices. These proposals implement provisions of the Leonel Rondon Pipeline Safety Act—part of the PIPES Act of 2020—and a National Transportation Safety Board (NTSB) recommendation directed toward preventing catastrophic incidents resulting from over-pressurization of low-pressure gas distribution systems similar to that which occurred on a gas distribution pipeline system in Merrimack Valley on September 13, 2018. The rule would take effect 12 months after publication.
"Pipeline Safety: Class Location Change" Rulemaking	PHMSA anticipates publishing the "Pipeline Safety: Class Location Change" final rule to add an alternative set of requirements operators may use when implementing integrity management principles where the class location of a pipeline segment has changed from a Class 1 location to a Class 3 location. • Operators would be required to notify PHMSA if they use integrity management activities to manage pipeline segments that have changed from a Class 1 to a Class 3 location. • The alternative set of requirements would apply only to those pipeline segments that have changed class location following the effective date of the rulemaking. • A Class 1 to Class 3 location segment would be defined as a High Consequence Area segment and subject to 49 CFR Part 192, Subpart O.
"Pipeline Operational Status" Rulemaking	PHMSA will issue an NPRM addressing risk-based regulations for idled pipes including requirements for allowing idled pipelines to resume operations.
"Carbon Dioxide and Hazardous Liquid Pipelines" Rulemaking	PHMSA issued a pre-publication of the NPRM on January 17th 2025, addressing regulations for the transportation of carbon dioxide pipelines in a gaseous state. However, the NPRM was promptly withdrawn as a result of the Regulatory Freeze Pending Review executive order.[23] During this rulemaking, PHMSA will consider whether applying the minimum safety standards of 49 C.F.R, Part 195, which apply to the transportation of carbon dioxide in the liquid state, will ensure safety.

California Geologic Energy Management Division (CalGEM) Regulations

In the last year, CalGEM enacted new regulations and a number of rulemakings which are currently underway impacting underground storage as described below:

SB 463 Chemical	CalGEM published the notice of proposed rulemaking action for SB463:

[23] 90 FR 8249

Inventory and Root Cause Analysis Regulations	Chemical Inventory and Root Cause Analysis Regulations in April 2024, which initiated a public comment period that ended on June 5, 2024. Following the initial comment period, CalGEM sent a public notice to interested parties regarding modifications to the text of the proposed regulations, leading to a 15-day public comment period that concluded on September 20, 2024.The regulations address the Senate Bill 463 (Stern, 2019) requirement for operators of gas storage wells to provide a complete chemical inventory of all chemical constituents in the materials that may be emitted in the event of a reportable leak. In addition, these regulations identify additional mitigation activities for well integrity. It is anticipated that the rulemaking process will be completed in 2025.
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. The public comment period for the draft Public Health Rule regulations closed on December 21, 2021. In July 2024, the final report by the Public Health Science Advisory panel has been released. It is unknown if this rulemaking will apply to Underground Storage fields. The formal rulemaking schedule has not been announced at this time.
SB 1137 Health Protection Zones	CalGEM submitted emergency rulemaking action to the Office of Administrative Law on December 28, 2022, to address the Senate Bill 1137 (Gonzalez, 2022) requirement that prohibits the issuance of well permits and the construction and operation of new production facilities within a health protection zone of 3,200 feet from a sensitive receptor. In addition, the bill establishes strict engineering controls to be implemented by existing operations within the health protection zone. The regulatory language excludes underground gas storage wells and attendant production facilities from compliance with the requirements related to Health Protection Zones. The 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. Senate Bill 1137 (SB 1137) was initially stayed due to a referendum challenge, which was certified on February 3, 2023, temporarily halting the implementation of SB 1137. However, on June 27, 2024, the proponent of the referendum withdrew it, resulting in the stay being lifted. Consequently, the provisions of SB 1137 and the emergency regulations adopted by CalGEM on January 6, 2023, became effective again on June 28, 2024.
SB 551: Cost Estimate Regulations for Oil and Gas Operations	The Cost Estimate Regulations for Oil and Gas Operations rulemaking process began in August 2023 and the regulations took effect on October 1, 2024. The regulations implement statutory reporting requirements to better understand the full costs associated with end-of-life remediation of an operator's assets. The regulations will require operators to submit cost estimate reports for plugging and abandoning wells, production facilities decommissioning, and site remediation. Operators must use methods established by CalGEM for their cost estimates. The deadline to submit initial cost estimate reports for operators who produced more than 3.5 barrels per day per well (including idle wells) in 2021, and those assessed

	under specific Public Resources Code sections for 2021, is July 1, 2026. After the initial submission, updates are required at least once every five years.
AB-1866: Oil and Gas Idle Wells	Assembly Bill 1866: Oil and Gas idle wells revises existing regulations on the management of idle oil and gas wells, increasing fees and expanding requirements for well management and elimination. This bill amends the text in section 3206 and 3206.3 of the Publics Resources Code. The bill was chaptered on September 26, 2024 and will be effective on January 1, 2025.

Long-term Gas Planning OIR

The Order Instituting Rulemaking to Establish Policies, Processes, and Rules to Ensure Safe and Reliable Gas Systems in California and Perform Long-Term Gas System Planning (Long-term Gas System Planning OIR, R.20-01-007), was opened in January 2020 to "respond to past and prospective events that together will require changes to certain policies, processes, and rules that govern the natural gas utilities in California. With respect to past events, several operational issues in Southern California prompt the Commission to reconsider the reliability and compliance standards for gas public utilities. Over the next 25 years, state and municipal laws concerning greenhouse gas emissions will result in the replacement of gas-fueled technologies and, in turn, reduce the demand for natural gas."[24]

The Commission issued a successor OIR for Long-Term Gas Planning, R.24-09-012 in September 2024. This proceeding intends to continue to address the gas system transition including long-term considerations for gas system planning processes as long as interim actions.

[24] Order Instituting Rulemaking R. 20-01-007 - https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M325/K641/325641802.PDF.

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's commitment to safety. The following matrix is a guide to the documents making up these plans, programs, and policies. Documents have been identified by their policy number and title and cross-referenced to the Gas Safety Plan chapter.

Policy Document – Safety Plan Matrix

Gas Safety Plan Chapter					
Policy	**Title**	**4**	**5**	**6**	**7**
100.0152	Self-Audit Requirements - Gas Measurement (Distribution, Transmission & Storage)	X		X	X
104.0001	Environmental Training	X			
104.0017	Pipeline Liquids - Field Handling	X			
104.0030	Hazardous Waste Shipping		X		
104.0040	Hazardous Material Shipping		X		
104.0095	Hydrogen Sulfide Lead Acetate Tape Analyzer Maintenance				X
104.0150	Proposition 65 Compliance		X		X
104.02	Notification Requirements for Release/Spill Events		X		
104.0210	Industrial Waste Discharge to Sanitary Sewer				X
104.0231	Water Discharges from Construction, Operations, and Maintenance Activities			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	Manufacturer Approval and Quality Audit Standard	X			
107.0293	RMLD - Remote Methane Leak Detector				X
107.0296	Sensit G2 Multigas Detector and SMART-CAL Equipment Operations and Maintenance Procedures				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 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 Houselines	X		X	X

Gas Safety Plan Chapter					
Policy	**Title**	**4**	**5**	**6**	**7**
151.0010	Environmental and other External Agency Inspections, Search Warrants, and Internal Notifications	X			
166.0015	Fire Prevention and Protection - Transmission and Storage	X		X	
166.0025	Prevention of Accidental Ignition of Natural Gas	X	X	X	
166.0032	Low-Voltage Electrical Safety Program				X
166.0076	Working in Flammable Atmospheres	X		X	
166.0077	Confined Space Operations	X			
166.09	Heat Illness Prevention Program				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 and Evaluation	X			
167.0204	TIMP Risk Assessment	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	Response to Conditions Discovered on Transmission Pipelines	X	X	X	X
167.0236	Analysis of Assessment Findings	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			

Gas Safety Plan Chapter					
Policy	**Title**	**4**	**5**	**6**	**7**
167.0252	Inspection of Cased Pipe	X			
167.0260	Fiber Optic Cable Installation for Pipeline Monitoring	X			X
167.04	Contractor Safety Program	X			X
167.0266	DREAMS Replacement Strategy	X		X	
167.09	Safety Management System	X	X	X	X
167.15	Hot Work Permit Program	X			
167.30	Lead and Metals in Surface Coatings and Other Sources: 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	Predicted Failure Pressure Analysis for Corrosion Metal Loss	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 Riser Locations	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

Gas Safety Plan Chapter					
Policy	**Title**	**4**	**5**	**6**	**7**
182.0140	Polyethylene Plastic Pipe - General Application Requirements	X		X	X
182.0148	Casing Assemblies - Plastic Carrier Pipe	X		X	X
182.0150	Polyethylene (PE) Service Selection Guide	X		X	X
182.0160	Purging Pipelines and Components	X		X	
182.0161	Purging Operations – Minimum Distance Between Purging-Stack and Ignition Sources	X		X	X
182.0162	Locking and Tagging 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
183.0116	Gas Control Telemetry Equipped Pipeline Rupture Identification and Response	X		X	X
183.0120	Emergency Outage Procedure	X	X	X	
183.0130	Materials and Supplies for Emergency Situations	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	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 PHMSA	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	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 Repairs/Abandonments of 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

Gas Safety Plan Chapter					
Policy	**Title**	**4**	**5**	**6**	**7**
184.0100	Inserting Polyethylene (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 Head Adapter - ¾-Inch			X	X
184.0115	Tapping/Stopping Polyethylene (PE) Fittings	X			
184.0120	Service Risers for Polyethylene (PE) Installations			X	X
184.0121	Service Riser Integrity Observations and/or Inspection	X			
184.0123	Composite Coating Repair for Anodeless Risers	X			
184.0124	Coring Anodeless (AL) Risers for Mini Riser Vault (MRV) Installations	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, Service Saddle Repair, and Mechanical Tapping Tee Inspection				X
184.0245	Leak Investigation		X		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	Hot/Cold Squeezing and Reopening Steel Mains and Steel Services	X			
184.0335	Steel Pipe Squeezers 6 through 12-inch	X	X		X
184.0340	Squeezing Polyethylene (PE) Pipe ½ through 8-inch	X			
184.0355	Pressure Control Machines - 2" Through 12"	X		X	
184.0360	Pressure Limitations and Related Equipment for Pressure Control Fittings 2-Inches and Smaller	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	2, 3, and 4-Inch Top Half Fittings				X
184.0447	Handling and Storage of Polyethylene (PE) Material	X		X	
184.0450	Pressure Control - Completion Plugs and Bushings ¾” – 1 ¼”	X		X	
184.0451	Pressure Control: Completion Machine H-17045	X		X	

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Policy	**Title**	**4**	**5**	**6**	**7**
184.0463	Pressure Control: H-17145 Completion Machine	X		X	
184.0480	Pressure Control - Completion Plugs	X		X	
184.0575	Pressure Control: Stop Standard 2" Service Tee With D-5 Machine	X		X	
184.0585	Remove 1" Street Ell from a Service Clamp - Install a 1" Threaded Both Ends (TBE) Nipple in Clamp	X		X	
184.0590	Pressure Control Qualification Requirements	X		X	
184.06	Gas-Handling and Pressure Control	X		X	
184.09	Prevention of 3rd Party Excavator and Company Contractor Excavation Damage to Company Subsurface Installations	X		X	X
184.12	Inspection of Aboveground Pipelines and Pipelines on Bridges and Spans	X		X	X
184.16	Distribution Valves - Operation, Maintenance, and Inspection	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	Gas Distribution 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
186.0035	Criteria for Cathodic Protection	X		X	X
186.0036	100mV Polarization Criteria	X		X	X
186.0040	Galvanic 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 Guideline for Below Ground	X		X	X

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	Corrosion Control				
186.0102	External Surface Preparation, Field Application and Repairs 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	External Surface Preparation and Coating Application for Above Ground Piping and Steel Components	X			X
186.0108	External Surface Preparation and Coating Application for Steel Tanks and Vessels (New & Refurbished)	X		X	
186.0109	Internal Surface Preparation and Coating Application for Tanks, Vessels & Drip Legs (New & Refurbished)	X		X	
186.0110	Field Tape Wrapping Requirements	X		X	X
186.0111	External Surface Preparation and Field Application of Grease Wrap	X		X	X
186.0117	External Surface Preparation and Coating Application 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	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	Consideration for Cathodic Protection on Well Casings				X
186.225	Design and Application of Cathodic Protection on Well Casings				X
186.226	Effectiveness of Cathodic Protection for Well Casings				X
186.227	Well 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 through 4-inch	X			X
187.0138	PE Saddle Fusions	X		X	X
187.0140	Transition Fittings	X			
187.0145	Polyethylene Valve Installations And Valve Box Assemblies For			X	X

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Policy	**Title**	**4**	**5**	**6**	**7**
	Polyethylene (PE) Pipe				
187.0146	Excess Flow Valve (EFV) - Installation and Operation	X		X	X
187.0155	Butt Fusing 2", 3" and 4" PE Pipe (Manual Machines)	X		X	X
187.0158	4", 6" and 8" Polyethylene (PE) Butt Fusion (Hydraulic Machines)	X		X	X
187.0170	Connect Copper Wire to Steel Pipe - Pin Brazing, Thermite Welding and Braze Welding Processes				X
187.0175	Inspection and Testing of Welds on Company Steel Piping	X		X	X
187.0180	Qualification and Re-Qualification of Welders	X		X	X
187.0181	Qualification of Personnel - Polyethylene Pipe Joiners	X		X	X
187.0200	Radiographic Examination API 1104			X	X
187.0210	Service Connections to Steel Pipelines			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
191.0025	Inspection and Scoring of Construction Work	X		X	X
191.01	Investigation of Accidents and Pipeline Failures	X	X	X	X
192.0010	Preparation of Construction Sketches	X			
192.0020	Field As-Built Requirements and Completion Sketch Preparation			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 High and Moderate Consequence Area Identification	X			
192.0212	On-Boarding of New Pipeline Construction Contractors	X			X
1957	Gas Stub Tag		X		
203.007	Pipeline Patrol and Unstable Earth Self Audit	X		X	
203.008	Pipelines on Bridges and Spans Self-Audit	X		X	
203.016	Leak Survey Self-Audit	X		X	
203.017	Valve Inspections and Maintenance Self-Audit	X		X	
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 Uprated Pipelines and Pressure Test Failures of Pipelines	X	X		
223.0002	Minimum Trench Requirements for Transmission Pipelines	X		X	X

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Policy	**Title**	**4**	**5**	**6**	**7**
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	Event Learning Process (ELP)		X		X
223.0065	Pipeline Patrol and Unstable Earth Inspections	X		X	X
223.0075	Pipeline Markers	X		X	X
223.0095	External and Internal Transmission Pipeline Inspection	X		X	X
223.0100	Leakage Surveys	X		X	X
223.0103	Aerial Leakage Surveys	X		X	X
223.0104	Optical Methane Detector Operation and Maintenance				X
223.0106	Updating of Pipeline Patrol Maps	X		X	X
223.0125	Below Ground Leakage Coding 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 and Reporting	X		X	
223.0177	Ultrasonic Thickness Examination for Materials	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 Imperfections on Steel Pressure Pipelines 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 Facility Valves	X			
223.0275	Main Reciprocating Gas Compressor Unit Operation – Transmission and Storage Operations	X		X	X

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Policy	**Title**	**4**	**5**	**6**	**7**
223.0280	Main Reciprocating Gas Compressor Maintenance – Transmission and Storage Operations	X		X	X
223.0315	Operation and Maintenance of Generator Units - Transmission and Storage Operations	X		X	X
223.0325	Main Centrifugal Gas Compressor Unit Operation	X		X	
223.0330	Main Centrifugal Gas Compressor Unit Maintenance	X		X	
223.0345	Pressure Relief/Pressure Limiting Devices, Testing/Inspection	X		X	X
223.0375	MAXIMO - Transmission and Storage Operations	X			X
223.0400	Gas Detectors in Compressor Stations	X		X	X
223.0410	Requirements for Designing Pipelines to Accommodate Smart Pigs	X		X	X
223.0415	Pipeline and Related Definitions	X		X	X
224.0000	Testing and Inspection of Safety Valves and Wellhead Valves				X
224.0015	Security and Accounting - Underground Storage Field Production Fluids				X
224.0030	Well Kill and Loading				X
224.010	Flow Erosion Monitoring and Assessment				X
224.02	Operation of Underground Storage Wells				X
224.023	Wireline and Slickline				X
224.05	Blowout Prevention Equipment				X
224.055	Well Unload				X
224.070	Gas Inventory Assessment in Underground Storage Reservoirs				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
224.112	Emergency Preparedness and Response Effectiveness - Storage Wells and Reservoirs	X	X	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

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224.119	Pressure Monitoring - Storage Wells and Reservoirs				X
224.120	Storage Field Interaction with Gas Control				X
224.121	Field Procedure - Emergency Incidents Storage				X
2849	Construction Inspection Report				X
3084	Corrosion Tests General Data Sheet	X			
3222	Design Data Sheet (DDS)	X		X	X
3506	Notice of Shutdown / Operational Deviation	X		X	
40-00	Polyethylene Pipe and Tubing				X
4090	100mV Polarization Form	X			
4091	Wax Casing Data Collection Form	X			
41-06.1	Pipe - Steel, Grades B through X65				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			

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Policy	**Title**	**4**	**5**	**6**	**7**
CCM.1	Introduction	X			
CCM.10	Site Specific Plans	X			
CCM.11	Record Keeping	X			
CCM.4	Roles, Responsibilities, and Required Qualifications	X			
CCM.5	External Corrosion Control Requirements	X			
CCM.6	Examination of Exposed Buried Pipe	X			
CCM.7	Internal Corrosion Control Requirements	X			
CCM.8	Atmospheric Corrosion Control Requirements	X			
CCM.A	Terms, Definitions and Acronyms	X			
CRMP1	Control Room Management Plan	X		X	
CRMP6	Gas Control Management of Change	X		X	
DIMP1	Introduction	X			
DIMP2	System Knowledge	X			
DIMP3	Threat Identification	X			
DIMP4	Evaluate and Rank Risk	X			
DIMP5	Identify and Implement Measures to Address Risk	X			
DIMP6	Measure Performance, Monitor Results and Evaluate Effectiveness	X			
DIMP8	Periodic Evaluation and Improvement	X			
DIMP9	Report Results	X			
DIMPA	Terms, Definitions and Acronyms	X			
ER-1	Gas Emergency Management Preparedness and Response Policy	X	X	X	
F4-1	Threat Evaluation Form	X			
F8-1	Transmission Pipeline 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	IIPP-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

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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.12	SIMP Assessment Plan	X			
SIMP.13	Regulatory Interaction	X			
SIMP.14	Communications Plan	X			
SIMP.15	Emergency Response Plan	X			
SIMP.2	Data Collection and Management	X			
SIMP.3	Threat Identification and Risk Assessment	X			
SIMP.4	Integrity Assessment and Remediation	X			
SIMP.5	Preventive and Mitigative Measures	X			
SIMP.6	Management of Change	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	Response to Assessment Findings and Repairs	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 & MCA Identification	X			
TIMP.4	Data Gathering and Integration	X			
TIMP.5	Threat Identification, Threat Evaluation, and Risk Assessment	X			
TIMP.8	Assessment Plan	X			
TIMP.9	Integrity Assessments	X			
TIMP.A	Terms, Definitions and Acronyms	X			

GAS SAFETY PLAN APPENDIX	SOCALGAS: SP.8-SC

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