



## 2026 Gas Safety Plan

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



March 15, 2026



**Cedric L. Williams**  
Chief Safety Officer  
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March 15, 2026

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

Re: Southern California Gas Company 2026 Gas Safety Plan

Dear Mr. Zhang:

Southern California Gas Company (SoCalGas) is pleased to submit our 2026 Gas Safety Plan (Safety Plan) pursuant to Decision 12-04-010. 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 promote safe and reliable gas service to our customers. Simply put, safety defines us both individually and organizationally.

SoCalGas strives to create an environment where employees at all levels, across all work locations and departments, are empowered to continuously improve the safety of our operations. Employees are encouraged to raise safety concerns and to stop the job whenever a condition, system, or activity poses potential safety risks. We take pride in our work, and we take ownership of safety, every day, and in every task.

We are committed to continuously advancing the maturity of our culture and our overall approach to safety. To support this commitment, SoCalGas has implemented a Safety Management System (SMS) aligned with American Petroleum Institute Recommended Practice 1173 (API RP 1173). We embrace continuous learning and improvement to strengthen both our company safety culture and the systems that support it.

Additions and updates to the 2025 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](mailto:AHughes@SoCalGas.com) if you have any questions regarding this submission.

Sincerely,

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

Cedric L. Williams  
Chief Safety Officer

The table below summarizes the portions of the 2026 Gas Safety Plan that are new or have changed, and are included with this submission:

<b>Chapter</b>	<b>New or Changed Element</b>
Chapter 1- Introduction	<ul style="list-style-type: none"> <li>• Updated the Introduction</li> </ul>
Chapter 2 - Advancing Safety Through Workforce Engagement & Collaboration	<ul style="list-style-type: none"> <li>• Renamed Chapter 2</li> </ul>
Chapter 3 –Advancing Safety Through Safety Systems	<ul style="list-style-type: none"> <li>• Renamed Chapter 3</li> <li>• Added Safety Management System section to introduction</li> <li>• Remove Facilities Integrity Management Program section</li> <li>• Updated Pipeline Safety Enhancement Plan Program section</li> <li>• Remove section from Control Room Management Plan</li> </ul>
Chapter 4 – Emergency Preparedness and Response	<ul style="list-style-type: none"> <li>• Renamed Chapter 4</li> <li>• Updated Gas Emergency Management Preparedness and Response Policy section</li> </ul>
Chapter 5 – State and Federal Regulations	<ul style="list-style-type: none"> <li>• Updated Figures A and B, to tables A and B</li> <li>• Updated Beyond Regulatory Compliance section retitled Beyond State and Federal Regulations</li> </ul>
Chapter 6 –Continuing Operations	<ul style="list-style-type: none"> <li>• Updated 2.2 Field Operations Training</li> <li>• Updated Cybersecurity section</li> </ul>
Chapter 7 – Emerging Issues	<ul style="list-style-type: none"> <li>• Removed bullet points in section 3</li> <li>• Updated Climate Change Adaptation OIR</li> <li>• Updated &amp; New Title Advanced Integration of Satellite and Aerial Technologies for Infrastructure Damage Assessment</li> <li>• Updated &amp; New Title Deployment of Aerial Methane Detection Technologies for Leak Survey and Emissions Monitoring</li> <li>• Updated Senate Bill 840</li> <li>• Updated Pipeline and Hazardous Material Safety Administration Regulations</li> </ul>
Appendix - Safety Policy Documents	<ul style="list-style-type: none"> <li>• Updated Appendix</li> </ul>

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## I. INTRODUCTION

This Gas Safety Plan reflects SoCalGas's shared commitment to the safety of our employees, the public, gas infrastructure, and our contractors. The Safety Plan brings together the practices, programs, policies, and standards that guide how we operate safely and responsibly every day. The plan provides an overview of the systems and efforts that support our safety culture, and it reinforces our collective dedication to learning, improving, and maintaining the integrity of our gas infrastructure.

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,<sup>1</sup> public safety,<sup>2</sup> infrastructure safety,<sup>3</sup> and contractor safety.<sup>4</sup> The focus on safety is the foundation of our business and shapes how we organize our efforts around our core safety value. Our commitment spans more than 150 years and informs the programs, policies, procedures, guidelines, and best practices that guide our work today.

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 priorities we foster a safety culture grounded in our North Star, *Safer Together*. *Safer Together* promotes open communication, curiosity about how we can improve, a commitment to safety excellence, and collaboration across teams and departments.<sup>5</sup>

To align our actions, SoCalGas is advancing a comprehensive Safety Management System (SMS) that integrates our safety systems and processes. This system supports continuous learning and improvement while enhancing the safe and reliable delivery of service to our customers. The Gas Safety Plan

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<sup>1</sup> Safety systems and processes focused on the health and safety of our employees. This includes safety policies, programs and training.

<sup>2</sup> Safety systems and processes focused on protection of our customers and the public (e.g., 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).

<sup>3</sup> Safety systems and processes associated with the design, construction, operation, inspection and maintenance of SoCalGas's infrastructure.

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

<sup>5</sup> 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 continuous learning and improvement, 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](https://www.socalgas.com/sites/default/files/2024-09/Attachment_1_SoCalGas_Revised_SafetyCulture_Improvement_Plan_PDFA.pdf)

highlights our SMS framework which is foundational to our approach to hazard identification, risk control, continuous learning, leadership commitment, and employee engagement.

## **1. 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 the organizational structure outlined above. The Appendix provides a listing of the safety program components discussed in the Gas Safety Plan.

## **2. 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. 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 anonymously, and an electronic form for submitting pipeline and occupational safety risks and ideas for improvement. A main purpose 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.<sup>6</sup> These include:

- The Injury & Illness Prevention Program (IIPP) and the Safety Manual for Employees encourage employees to identify risks and elevate them to management.
- Employees are encouraged to report good catches<sup>7</sup>, near misses,<sup>8</sup> and stop-the-jobs.<sup>9</sup> These employee reports, as well as safety incidents incurred during the week, are reviewed by the Safety Organization, 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)<sup>10</sup> 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)<sup>11</sup> 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<sup>12</sup>, as well as Event Learnings<sup>13</sup>, include frontline employees to foster broader understanding, improve work processes, and gain insights directly from those performing work to enhance safety and continuously improve.

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<sup>6</sup> Concerns are also reported via the Ethics & Compliance Helpline. Safety related issues are flagged for prioritization.

<sup>7</sup> 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.

<sup>8</sup> In 2020, SoCalGas established an independent Advisory Safety Council to engage the perspectives of external experts as part of our safety journey.

<sup>9</sup> PA-1 Public Awareness Plan.

<sup>10</sup> 84 FR 52180 – “Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments”.

<sup>11</sup> 49 CFR § 192.710(a).

<sup>12</sup> Learning Teams: A collaborative method that brings together frontline employees and experts to understand how work is actually performed. Learning Teams identify system influences and operational realities to improve processes proactively and enhance safety and reliability.

<sup>13</sup> Event Learning Process: A structured, standardized approach for analyzing operational events to understand what happened, why it occurred, and how to prevent recurrence.

- Annual Employee and Contractor Safety Congresses and District Safety Standdowns across the service territory.
- Meetings between the Chief Safety Officer (CSO), Union Leadership and other safety leaders.
- The Company's Management of Change process provides a means to obtain employee review and feedback on proposed changes.

In addition, SoCalGas engages with our contractor stakeholders to identify 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.

## **2. CULTIVATING PUBLIC SAFETY BY FOSTERING PUBLIC AWARENESS**

SoCalGas cultivates public safety through its Public Awareness Plan.<sup>14</sup> The goal of the Public Awareness Plan is to enhance safety by increasing awareness of the presence of pipelines. 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, 1<sup>st</sup> edition. 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

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<sup>14</sup> PA-1 Public Awareness Plan

SoCalGas. It includes:

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

### III. ADVANCING SAFETY THROUGH SAFETY SYSTEMS

#### 3. SAFETY MANAGEMENT SYSTEM

SoCalGas's Safety Management System (SMS) is a structured, company-wide framework that integrates established roles, responsibilities, policies, procedures, meetings, and practices to manage safety comprehensively and systematically. By consolidating these elements into a single risk-based system, the SMS provides rigor, accountability, and continuous improvement in the way SoCalGas identifies and mitigates potential hazards and risks. The goal of the SMS is to strengthen our safety culture and enhance the safety of employees, the public, our infrastructure, and contractors. The SMS also helps prevent or reduce the likelihood and consequences of unintended incidents or injuries. The SMS sets the foundation for how safety is managed across the organization and aligns with the ten elements outlined in American Petroleum Institute Recommended Practice 1173 (API RP 1173).

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:

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 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 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.
Operation and Maintenance (O&M) Plan	The O&M plan is a collection of policies designed to comprehensively address the safe operation and maintenance of SoCalGas facilities.
Pipeline Safety Enhancement Plan (PSEP)	PSEP was established in response to a Commission rulemaking (later codified as Public Utilities Code §§ 957 and 958), that mandated operators to: strength test or replace transmission pipelines that have not been adequately tested or for which traceable, verifiable and complete records of a strength test are not available; retrofit transmission pipelines to accommodate

Gas Safety Enhancement Programs (GSEP)	inline inspection; and install automated valves. <sup>15</sup>
Control Room Management Plan (CRMP)	The GSEP are safety-related programs developed and established in response to various safety-related regulations effectuated by PHMSA (e.g., GTSR, Valve Rule). CRMP was 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.

#### 4. 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 pipeline segments located in 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 GTSR,<sup>16</sup> the TIMP is designed to assess and enhance the integrity of transmission pipelines in HCAs and other applicable areas such as Moderate Consequence Areas (MCAs) under 49 CFR §192.710<sup>17</sup> through the identification and evaluation of threats, assessment of material integrity, 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 located 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. The GTSR Part 2 expanded threat identification, corrosion control standards, and integrity assessment requirements, which now require operators to use additional diagnostic tools, enhanced inspection methods, and improved monitoring capabilities to identify and evaluate system threats more comprehensively. 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 supports 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 reviewed and improved to maintain effectiveness in managing pipeline safety.

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<sup>15</sup> As of 2025, all identified segments have been strength tested or replaced and will continue to be evaluated under the GSEP.

<sup>16</sup> 84 FR 52180 – “Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments.”

<sup>17</sup> 49 CFR § 192.710(a).

## **5. 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 2025, 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 pipelines by addressing threats such as corrosion and manufacturing defects.

## **6. 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 which incorporates, by reference, API RP 1171, Functional Integrity of Natural Gas Storage in Depleted Hydrocarbon Reservoirs and Aquifer Reservoirs, 2<sup>nd</sup> edition., as well as applicable industry standards. The SIMP is currently being updated to incorporate additional safety measures, including the development of well control plans, as required by SB 463 which updated CCR § 1726.

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 safeguard competence in managing storage facilities.

## **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 CFR §192.605, "Procedural manual for operations, maintenance, and emergencies." and industry recommended guidelines and practices. These O&M policies include, but are not limited to, various processes such as :

- Operating, maintaining, and repairing the pipeline and its components;
- Controlling corrosion on pipelines and surface facility equipment;
- 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.
- Maintenance of electrical equipment in accordance with National Fire Protection (NFPA) 70B

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 proactively updated throughout the year in response to evolving regulations, technological advancements, and other drivers of operational improvement.

Each Gas Standard referenced within the O&M plan undergoes a comprehensive functional review by the Responsible Person (RP) at least once every five years to align with the CFR. 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, annual refresher training is provided to all operations personnel to reinforce awareness of critical safety policies and procedures.

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 not 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; and
- Enhancement of valve infrastructure through the retrofit of existing valves and installation of additional remotely operated 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 reauthorizations. Current rules that have taken effect and driven incremental safety enhancements include the following:

- **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.<sup>18</sup>

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<sup>18</sup> 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.

- **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 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 undertaken a multi-year Control Center Modernization (CCM) program designed to accelerate operational improvements and safety enhancements with a primary objective to expand its 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. CCM initiatives include:

- Constructing a modernized gas operations control center facility with expanded functionality such as:
  - A larger control room with robust data visualization capabilities.
  - Increased server/storage space.
  - A SCADA simulator for operational training.
  - Enhanced fatigue mitigation countermeasures such as a circadian lighting system, sleep rooms and a gym.
- 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:
  - Upgraded SCADA system to improve stability, security, and functionality for control room operations.
  - Developing an extensive electronic logging system to support situational awareness, enhance shift turnover, as well as 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 efforts, Gas Control processes continue to be improved, enhancing the safety and efficiency across SoCalGas operations.

## **IV. EMERGENCY PREPAREDNESS AND RESPONSE**

### **1. SOCALGAS'S COMPREHENSIVE APPROACH TO EMERGENCY RESPONSE**

SoCalGas employs a comprehensive emergency response approach, continually refining its programs, policies, standards, and procedures to address leaks, hazardous conditions, and emergencies such as earthquakes, fires, and mudslides. This integrated strategy encompasses communication, preparedness, incident response, training, outreach, and mutual assistance, and supporting a proactive and coordinated approach to safety.

SoCalGas utilizes a centralized watch desk concept to support enterprise-level situational awareness of emerging events and real-time incidents that may impact employees, the public, infrastructure, and contractors. The watch desk is staffed 24 hours a day 7 days a week and analyzes evolving information from internal and external sources while facilitating proactive coordination, notification, and response across appropriate functional areas. Preparedness and response activities are governed by 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 California Utilities Emergency Association (CUEA) and the American Gas Association (AGA), reinforcing a systematic approach to emergency preparedness.

## **2. 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 CFR §§ 192.613 and 192.615. It outlines how the Company prepares for and responds to emergencies by using the FEMA ICS framework, supported by annual training for identified emergency responders that include ICS FEMA 100/200, ICS Role-Specific instruction, Message Center Reporting, use of the Emergency Responder Handbook, and participation in exercises and tabletops. This structured SMS approach enables continuous improvement as lessons are captured and integrated following emergency events.

This plan covers the following emergency response elements:

- Prevention and Protection
- Preparedness
- Response
- Recovery
- Enabling Technologies

## **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 code requirements. The code requirements 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 3 and the Emergency Response Plan described in Chapter 4 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. SoCalGas maintains its pipelines and facilities in accordance with these requirements.

#### 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)
- GTI Energy (formerly, 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

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

**Table A: List of In-Process Activities from Industry Group Participation**

<b>Current Activities</b>	<b>Implementation Type &amp; Responsible Organization</b>
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/Gas Distribution
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
Research, Develop and Demonstrate technologies leveraging aircraft systems (crewed and uncrewed), 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.	In Progress Research and Materials Strategic Programs
Edison Electric Institute’s (EEI) development of a Safety Classification and Learning (SCL) Model to track Serious Injury and Fatality (SIF) Potential and promote learning and improvement	In Progress Safety Management Systems

**Table B** identifies examples of activities that SoCalGas has implemented as a regular and routine element of our operations. Many of the activities are processes 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.

**Table B: List of Implemented Safety Activities**

<b>Implemented Activities</b>	<b>Implementation Type &amp; Responsible Organization</b>
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
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
Under the DIMP, identify distribution assets where increased leak surveys may be appropriate.	Adopted Integrity Management
Geohazard assessment and winter planning where increased geohazard risks are identified.	Adopted Integrity Management and Gas Operations Services
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
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

<b>Implemented Activities</b>	<b>Implementation Type &amp; Responsible Organization</b>
Install Optical Pipeline Monitoring on all new or replacement pipeline segments that meet the applicable size criteria and operational standards. This system will enable remote real-time monitoring of potential leaks, identification of non-native or unusual ground movements, and detection of third-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
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
Launch 811 Ambassador program that 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 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. SAFE AND RELIABLE STORAGE AND TRANSPORTATION**

SoCalGas has designed its integrated gas transmission, distribution, and storage systems to meet Commission standards for both core and noncore customers. The system is designed to provide continuous service to the forecasted demand of core customers (generally residential and small commercial) forecasted demand during a 1-in-35-year peak day event, during which noncore service is curtailed, and to the forecasted demand of all customers 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 forecasted 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 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 and gas storage infrastructure, improve safety, and comply with regulatory and environmental regulations.

## **2. SOCALGAS WORKFORCE SIZE, TRAINING AND QUALIFICATIONS**

### **2.1. 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 frequently assessed to develop hiring and employee development plans, supporting system safety and reliability.

Contractors are used as needed, complying with collective bargaining agreements. They undergo training and meet safety compliance requirements, monitored through SAP Fieldglass and SoCalGas leadership to facilitate adherence to company standards.

### **2.2. 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 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, proficient, 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 participates in industry forums to align training activities with regulations and to identify 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 2026, SoCalGas will continue offering Leadership Catalyst—launched in 2024—as an open enrollment program designed to support all leaders in strengthening our safety culture and fostering a continuous learning mindset. Additionally, an adapted version of Leadership Catalyst will be introduced in Q2 2026 for all individual contributors, extending the program’s key messages and reinforcing our shared commitment to growth and excellence.

### 2.3. 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 employee 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.

Contractor 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.

## 3. 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 drug and alcohol test on file before their first performance of safety-sensitive functions and are entered into the contractor’s random testing pool.

## 4. RISK MANAGEMENT

### 4.1. 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 assessment. 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 consequences 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).

#### 4.2. Enterprise Asset Management

SoCalGas executes 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 data-driven, risk-informed value framework for long-term strategy on all assets across the enterprise.

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 goal of broadening the program to cover enterprise-wide assets. The program follows a maturity model to improve asset data intake, 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.

### 5. 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 standards. 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
- Leadership & Event Protection
- 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 remediation as part of a continuous improvement strategy for risk mitigation.

## 6. CYBERSECURITY

The Sempra California Cybersecurity Department oversees the management of cybersecurity risks for both Information Technology (IT) and Operational Technology (OT).

The services provided by the Cybersecurity Department focus on maintaining and improving the company's security posture amid increasing cybersecurity threats. Cybersecurity supports technology innovations and enhancements within the business by reducing the likelihood and potential impact of cybersecurity incidents across all business areas within SoCalGas, SDG&E<sup>19</sup>, and the Corporate Center while balancing costs and applying prioritized risk management. Additionally, the department supports enterprise cybersecurity capabilities such as delivering cybersecurity training and awareness to all users to enable them to perform their functions safely, reliably, and securely.

The Cybersecurity program includes the following functional areas: Cybersecurity Strategy, Portfolio and Governance; Cybersecurity Architecture and Engineering; Cybersecurity Governance and Risk Management; Cybersecurity Operations and Compliance; Cybersecurity Threat Detection and Response; and Enterprise Identity Services.

The Cybersecurity program utilizes cybersecurity and risk management frameworks, including but not limited to the NIST Cybersecurity Framework (CSF), Center for Internet Security (CIS Controls), NIST SP 800-53, MITRE ATT&CK framework, and the Transportation Security Administration (TSA) Security Directive Pipeline-2021-02F Pipeline Cybersecurity Mitigation Actions, Contingency Planning, and Testing. Additionally, the Companies comply with applicable laws and regulations at both the state and federal levels.

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<sup>19</sup> While this Safety Plan is focused on SoCalGas, the cybersecurity organization, personnel, and technologies that support SoCalGas are shared across Sempra California, including SDG&E and the Corporate Center. This shared and standardized approach ensures consistent application of industry standards and helps reduce cyber risk across all Sempra California companies.

## **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 of 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 and regulatory groups as well as news and trade publications.

### **3. COLLABORATION WITH REGULATORY AGENCIES**

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

#### **Safety Culture Order Instituting Rulemaking (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, the CPUC, and stakeholders. SoCalGas continues to participate and collaborate with the CPUC and stakeholders to foster advancements in safety culture. SoCalGas will monitor Phase 2 (small multi-jurisdiction utilities and the independent gas storage operators) of the Rulemaking for any potential items that will impact the large IOUs assessments or the framework established by the CPUC.

#### **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 remains an industry leader in developing and applying new methods and 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
- Capture of natural gas released during pipeline replacement or safety maintenance and testing, allowing 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 in support of California’s decarbonization goals, while continuing to provide safe, reliable and affordable 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, landslides, flooding, and debris flows) 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. The utility emergency response team also uses 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 the energy transition, and to better identify potential vulnerabilities and opportunities to enhance resiliency for gas infrastructure.

## **Climate Change Adaptation OIR**

Utilities have been building resilience and redundancy into infrastructure investments from an overall safety and reliability perspective for decades. Projected increases in climate change and extreme weather events pose growing risks to utility infrastructure, operations, and services. Consequently, climate adaptation will need to be further integrated into utility planning.

SoCalGas is continuing to further the process of integrating climate change adaptation into utility

planning processes in alignment with Commission direction.<sup>20</sup> SoCalGas's Climate Adaptation Vulnerability Assessment (CAVA) addresses the requirements of the Climate Change Adaptation OIR and incorporates industry best practices for assessing physical climate risks. The methodology uses forward-looking climate science information applied to the gas system to derive climate change risk. The CAVA identifies assets more susceptible to climate hazards and sets out options for adaptation measures. In its future CAVA (due in 2028), SoCalGas will continue to explore ways to integrate climate exposure data and vulnerability analysis into its quantitative risk models.<sup>21</sup> Additionally, SoCalGas has and continues to perform robust engagement with Disadvantaged and Vulnerable Communities (DVCs)<sup>22</sup> to empower and support these communities in building resilience.

### **Advanced Integration of Satellite and Aerial Technologies for Infrastructure Damage Assessment**

SoCalGas employs a comprehensive satellite monitoring program year-round to capture high-resolution pre- and post-event imagery of regions affected by wildfires, seismic activity, or ground displacement. These satellite datasets are integrated with internal Geographic Information System (GIS) layers and infrastructure schematics to proactively identify and assess potential impacts to critical assets, particularly during wildfire season and periods of heightened hydrological activity.

In parallel, SoCalGas has institutionalized the use of both crewed aircraft and Uncrewed Aerial Systems (UAS), including Uncrewed Aerial Vehicles (UAVs or drones), to enhance situational awareness. These platforms capture ultra-high-definition aerial imagery and generate detailed 3D topographic models using advanced Light Detection and Ranging (LiDAR) technology. This capability significantly improves the accuracy and efficiency of post-incident damage assessments across challenging terrain and remote locations.

### **Deployment of Aerial Methane Detection Technologies for Leak Survey and Emissions Monitoring**

To augment its leak detection and emissions monitoring capabilities, SoCalGas utilizes sophisticated methane sensing technologies deployed from both crewed aircraft and UAV platforms. These airborne systems leverage the latest advancements in remote gas detection, enabling wide-area surveys and targeted patrols in operational environments where ground access is limited or poses safety risks.

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<sup>20</sup> See R.18-04-019. Order Instituting Rulemaking (OIR) to Consider Strategies and Guidance for Climate Change Adaptation; R.20-07-013, Risk-Based Decision-Making Framework; R.24-09-012. Long-Term Gas Planning.

<sup>21</sup> SPD's RAMP Report recommends that: "1. Quantification of climate risk was not required in these filings, but SDG&E and SoCalGas should continue to work toward incorporating quantified climate risk elements in future RAMP filings. 2. SDG&E and SoCalGas should include in future climate change adaptation RAMP chapters a list of the assets that were included in their respective CAVA but omitted from RAMP risk chapters due to RDF prioritization criteria." RAMP Report at page 188.

<sup>22</sup> As defined by D.20-08-046, a DVC consists of: "The 25% highest scoring census tracts according to the California Communities Environmental Health Screening Tool (CalEnviroScreen); all California tribal lands; census tracts with median household incomes less than 60% of state median income; and census tracts that score in the highest 5% of Pollution Burden within CalEnviroScreen but do not receive an overall CalEnviroScreen score due to unreliable public health and socioeconomic data."

These aerial detection systems are instrumental in identifying fugitive methane emissions with high precision, supporting SoCalGas's commitment to safety, regulatory compliance, and environmental stewardship. Oversight of all aviation operations, including adherence to Federal Aviation Administration (FAA) regulations and local ordinances governing drone usage, is managed by the Aviation Services department.

In addition to advancing emissions monitoring and reduction objectives, the use of aerial detection technologies provides measurable benefits that directly support system safety. By enabling early identification of leaks that may not be readily detectable through traditional or less frequent inspection methods, these technologies support a preventative approach to risk management rather than a reactive response. Proactive detection and timely mitigation reduce the likelihood that small leaks escalate into larger safety hazards, thereby enhancing protection for the public, employees, and surrounding communities.

Early intervention also limits prolonged gas losses, supporting system efficiency, and contributing to customer affordability. Compared to reliance on lagging indicators or less sophisticated detection tools, advanced aerial monitoring improves situational awareness, reduces the duration of undetected conditions, and strengthens SoCalGas's ability to address safety risks before they manifest as higher-consequence events.

### **Optical Pipeline Monitoring System for Pipeline Damage Prevention and Leak Detection**

SoCalGas installed Optical Pipeline Monitoring Systems (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 at locations in Santa Barbara County, Kern County, Riverside County, and along sections of pipeline in Ventura County. SoCalGas will continue to expand 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 operational dairy farm producer sites.

SoCalGas is also 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 safety best practices.

In response to the CPUC's directive, on March 1st, 2024, SoCalGas, SDG&E, Southwest Gas, and PG&E (all four gas-IOUs) proposed hydrogen blending demonstrations, which are still being considered by the CPUC. Moreover, since that time, much additional research, demonstration, and operationalization have occurred in the United States and around the world that support advancing consideration of a low-level renewable hydrogen injection standard. Assuming consistency with the direction given by the CPUC on advancing hydrogen blending, 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 into its system.

SoCalGas's safety efforts for its hydrogen blending demonstration projects involve 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.<sup>23</sup>

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, which is in the process of reauthorization. The PIPES Act of 2020 included 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
- Strengthened safety regulations covering local gas distribution systems

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<sup>23</sup> D.24-12-074, Ordering Paragraph 10(e)

- 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

Drafts of the bill that will reauthorize the PIPES Act <sup>24</sup> indicate that Congress will also prioritize the following enhancements:

- Update safety rules for above-ground storage tanks that are currently in use
- Enhance operators’ ability to test new technologies in real world situations
- Guard against risks associated with pipelines constructed of composite materials
- Strengthen state “call-before-you-dig” programs
- Address the safety of CO2 and hydrogen pipelines
- Make cybersecurity requirements permanent to prevent attacks like the Colonial Pipeline hack in 2021
- Address aging plastic components known to fail and land movement caused by landslides and earthquakes
- Mitigation of Geological hazards through evaluation reports and potential subsequent regulation for identified threats
- Recommendations on Maximum Allowable Operating Pressure record requirements for reconfirmation
- Review and update methodology for Potential Impact Radius calculations

Examples of new and upcoming rulemakings include:

Rulemaking	Description
“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. <ul style="list-style-type: none"> <li>• 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.</li> </ul>

<sup>24</sup> House of Representative Bill H.R.5301 [Text - H.R.5301 - 119th Congress \(2025-2026\): PIPES Act of 2025 | Congress.gov | Library of Congress](https://www.congress.gov/bills/119/house/5301/text/all/2025-01-01) & Senate Bill S.2975 [Text - S.2975 - 119th Congress \(2025-2026\): PIPELINE Safety Act of 2025 | Congress.gov | Library of Congress](https://www.congress.gov/bills/119/senate/2975/text/all/2025-01-01)

	<ul style="list-style-type: none"> <li>• The alternative set of requirements would apply only to those pipeline segments that have changed class location following the effective date of the rulemaking.</li> <li>• 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.</li> </ul>
“Carbon Dioxide and Hazardous Liquid Pipelines” Rulemaking	PHMSA issued a pre-publication of the NPRM on January 17 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. <sup>25</sup> During this rulemaking, PHMSA will consider whether applying the minimum safety standards of 49 CFR Part 195, which apply to the transportation of carbon dioxide in the liquid state, will ensure safety.
“Geohazard and Aging Infrastructure Mitigation” Rulemaking	PHMSA issued an Advisory Bulletin reminding operators of gas and hazardous liquid pipelines of risks posed by earth movement and geological hazards. The bulletin emphasizes monitoring terrain stability, climate-related changes, and implementing preventive measures under 49 CFR 192.935 and 195.452. Operators are urged to conduct geohazard risk assessments, design pipelines to withstand external loads, and develop site-specific mitigation plans. These actions aim to prevent failures caused by landslides, subsidence, flooding, and earthquakes. The proposed PIPES Act of 2025 <sup>26</sup> (pending action by Congress) is looking to enforce addressing risks from land movement (e.g., landslides, earthquakes) and replace aging plastic components known to fail. Includes enhanced monitoring and emergency preparedness measures.
“Cybersecurity Requirements” Rulemaking	PHMSA, in coordination with TSA, is moving to make cybersecurity requirements permanent for pipeline operators. While no NPRM has been published yet, the proposed PIPES Act of 2025 directs TSA to codify standards introduced after the Colonial Pipeline incident. Operators will need to implement robust cybersecurity programs, conduct vulnerability assessments, and comply with reporting protocols to protect against malicious cyber campaigns.
“Excavation Damage Prevention” Rulemaking	PHMSA enforces excavation damage prevention requirements under 49 CFR Part 196. The existing rule establishes minimum standards for excavators, mandates participation in one-call systems, and outlines enforcement processes for states with inadequate programs. The proposed PIPES Act 2025 is expected to strengthen these requirements by adopting Common Ground Alliance best practices,

<sup>25</sup> 90 FR 8249

<sup>26</sup> House of Representative Bill H.R.5301 [Text - H.R.5301 - 119th Congress \(2025-2026\): PIPES Act of 2025 | Congress.gov | Library of Congress](#) & Senate Bill S.2975 [Text - S.2975 - 119th Congress \(2025-2026\): PIPELINE Safety Act of 2025 | Congress.gov | Library of Congress](#)

	increasing penalties, and enhancing federal oversight where state enforcement is lacking.
“Above-Ground Storage Tanks” Rulemaking	The proposed PIPES Act of 2025 directs PHMSA to revise regulations for in-service breakout tanks under 49 CFR Part 195 to allow risk-based inspection intervals instead of prescriptive annual inspections. PHMSA published an ANPRM on May 21, 2025 seeking input on aligning tank inspection requirements with API Std 653 and modernizing corrosion control techniques.
“Testing New Technologies” Rulemaking	The proposed PIPES Act of 2025 authorizes PHMSA to enhance operators’ ability to test innovative technologies in real-world conditions by streamlining special permit processes and incorporating updated industry standards. PHMSA’s Periodic Standards Update II Final Rule (Aug 21, 2025) incorporated 19 new technical standards to encourage innovation and reduce compliance burdens.
“Composite Materials” Rulemaking	Section 214 of the proposed PIPES Act of 2025 requires PHMSA to study risks associated with pipelines constructed of composite materials and report findings to Congress. This study will inform future rulemaking to address design, integrity management, and failure modes unique to composite pipelines.

Examples of additional rulemakings under consideration 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 17, 2025, but promptly withdrew the rule as a result of the Regulatory Freeze Pending Review executive order. <sup>27</sup> SoCalGas continues to monitor activity related to this rulemaking.
“Safety of Gas Distribution Pipelines and Other Pipeline	The “Pipeline Safety: Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives” NPRM was issued by PHMSA on August 24, 2023. PHMSA is proposing regulatory amendments that will

<sup>27</sup> 90 FR 8249

<p>Safety Initiatives” Rulemaking</p>	<p>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.</p> <p>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.</p>
<p>“Pipeline Operational Status” Rulemaking</p>	<p>PHMSA will issue an NPRM addressing risk-based regulations for idled pipes including requirements for allowing idled pipelines to resume operations.</p>

**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:

<p>SB 463 Chemical Inventory and Root Cause Analysis Regulations</p>	<p>CalGEM’s SB 463 regulations went into effect July 1, 2025 and require 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 and emergency response planning such as the development of well control plans.</p>
<p>Public Health Regulations</p>	<p>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.</p>

<p>SB 1137 Health Protection Zones</p>	<p>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. Permanent regulations will be effective July 1, 2026.</p>
<p>SB 551: Cost Estimate Regulations for Oil and Gas Operations</p>	<p>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.</p>
<p>AB-1866: Oil and Gas Idle Wells</p>	<p>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 went into effect on January 1, 2025.</p>

## **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.”<sup>28</sup> 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 well as interim actions.

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<sup>28</sup> Order Instituting Rulemaking R. 20-01-007 - <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M325/K641/325641802.PDF>.

## VIII. 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.

### 1. 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

<b>Gas Safety Plan Chapter</b>					
<b>Policy</b>	<b>Title</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>
142.1189	Premise Access				X
142.5660	Purging Gas Meters and Customer Houelines	X		X	X
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
167.0011	Traditional In-Line Inspection Pigging Procedure	X	X		
167.0012	Robotic In-Line Inspection (ILI) Pigging Procedure	X	X		
167.0100	Operator Qualification Program	X		X	X
167.0125	Self-Audit Guidelines - Pipeline Integrity Program	X			
167.0133	PI-Ex Pigging Tray	X	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	Transmission Pipeline Assessment 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
167.0231	Corrosion Monitoring	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			

<b>Gas Safety Plan Chapter</b>					
<b>Policy</b>	<b>Title</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>
167.0245	Global Positioning System (GPS) Process	X			
167.0246	GPS Control Survey	X			
167.0247	Aboveground Survey Plan	X			X
167.0248	Alternating Current Attenuation Survey	X			X
167.0249	Close Interval Survey	X			X
167.0250	Voltage Gradient Survey	X			
167.0251	Soil Resistivity Survey	X			
167.0252	Inspection of Cased Pipe	X			
167.0260	Optical Cable Installation for Optical Pipeline Monitoring (OPM)	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
182.0053	PFP Analysis of Cracks & Crack-like Defects	X		X	X

<b>Gas Safety Plan Chapter</b>					
<b>Policy</b>	<b>Title</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>
182.0055	Identification of Steel Pipe and Butt Weld Fittings	X		X	X
182.0056	Material Traceability for High-Pressure Systems	X		X	X
182.0060	Service Riser Locations	X			
182.0064	Maximum Allowable Operating Pressure (MAOP) Reconfirmation	X		X	X
182.0070	Angles and Bends in Steel Piping			X	X
182.0080	Casing Assemblies - Steel Carrier Pipe	X		X	X
182.0085	Pipe End Closures				X
182.0087	Inspection of Pipeline Cable-Suspension Bridges	X		X	
182.0090	Designs for Pipelines in Bridges	X		X	X
182.0093	Wear Pads and Bands for Steel Gas Piping	X		X	X
182.0125	Steel Service Design - 60 psig or less				X
182.0130	Steel Service Design 61-1000 PSIG			X	X
182.0140	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
182.0158	Engineering Critical Assessment (ECA) Procedure	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
183.0112	Gas Transmission Off Hour On-Call Procedures	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

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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
183.0177	Earthquake Response Procedure - Pipeline Facilities	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
184.0051	Backfill and Compaction Method (City of LA Version)			X	X
184.0055	Backfill and Compaction Method (non-City of LA Version)			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
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 - 3/4-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			

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184.0195	Regulator Control Piping, Settings, and Component Numbering	X		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	
184.0378	T.D. Williamson (TDW) T-101b/T-101b-XL Drilling Machines	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	
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	X		X	X

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	Excavation Damage to Company Subsurface Installations				
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
184.21	Curb Valve Inspections on Distribution Services	X		X	X
185.0001	Meter Locations	X		X	X
185.0002	Meter Set Assembly Damage Protection Guidelines	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
186.0012	Corrosion Definitions, Terms and Acronyms	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	Reference Electrodes	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
186.0092	AC Current Density Monitoring	X		X	X
186.0100	Approved Protective Coatings Guideline for Below Ground Corrosion Control	X		X	X
186.0102	External Surface Preparation, Field Application and Repairs of Fusion Bonded Epoxy Coating	X		X	X

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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
186.0123	Indirect Coating Assessments	X		X	X
186.0135	Operation and Maintenance of Cathodic Protection Facilities	X		X	X
186.0143	Internal Corrosion Mitigation for Hydrotesting	X		X	X
186.0170	Record Keeping - Corrosion Control	X		X	X
186.0171	AC Safety and AC Corrosion Threats	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

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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 Polyethylene (PE) Pipe			X	X
187.0146	Excess Flow Valve (EFV) - Installation and Operation	X		X	X
187.0155	Butt Fusing 2", 3" and 4" PE Pipe (Manual Machines)	X		X	X
187.0158	4", 6" and 8" Polyethylene (PE) Butt Fusion (Hydraulic Machines)	X		X	X
187.0170	Connect Copper Wire to Steel Pipe - Pin Brazing, Thermite Welding and Braze Welding Processes				X
187.0175	Inspection and Testing of Welds on Company Steel Piping	X		X	X
187.0180	Qualification and Re-Qualification of Welders	X		X	X
187.0181	Qualification of Personnel - Polyethylene Pipe Joiners	X		X	X
187.0200	Radiographic Examination API 1104			X	X
187.0210	Service 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
191.0212	On-Boarding of New Pipeline Construction Contractors	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			
1957	Gas Stub Tag		X		

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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 Upgraded Pipelines and Pressure Test Failures of Pipelines	X	X		
223.0002	Minimum Trench Requirements for Transmission Pipelines	X		X	X
223.0003	General Construction Requirements - Steel Transmission System			X	X
223.0030	Failure Analysis Process for Gas Systems	X		X	X
223.0031	Abnormal Operations - Transmission	X	X	X	
223.0032	Event Learning Process (ELP)		X		X
223.0052	Quality Management Leak Survey Assessments	X		X	X
223.0054	Quality Management Locate and Mark Assessments	X		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			

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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	
223.0247	Tag Naming Standard	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
223.0275	Main Reciprocating Gas Compressor Unit Operation – Transmission and Storage Operations	X		X	X
223.0280	Main Reciprocating Gas Compressor Maintenance – Transmission and Storage Operations	X		X	X
223.0315	Operation and Maintenance of Generator Units - Transmission and Storage Operations	X		X	X
223.0325	Main Centrifugal Gas Compressor Unit Operation	X		X	
223.0330	Main Centrifugal Gas Compressor Unit Maintenance	X		X	
223.0345	Pressure Relief/Pressure Limiting Devices, Testing/Inspection	X		X	X
223.0375	MAXIMO - Transmission and Storage Operations	X			X
223.0400	Gas Detectors in Compressor Stations	X		X	X
223.0410	Requirements for Designing Pipelines to Accommodate Smart Pigs	X		X	X
223.0415	Pipeline and Related Definitions	X		X	X
224.0000	Testing and Inspection of Safety Valves and Wellhead Valves				X
224.0015	Security and Accounting - Underground Storage Field Production Fluids				X
224.0030	Well Kill and Loading				X
224.010	Flow Erosion Monitoring and Assessment				X
224.02	Operation of Underground Storage Wells				X
224.023	Wireline and Slickline				X
224.05	Blowout Prevention Equipment				X
224.055	Well Unload				X
224.070	Gas Inventory Assessment in Underground Storage Reservoirs				X

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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	
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	

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54-17.1	Cast Iron Flanges				X
56-40	Stop Cocks				X
56-50	Steel to Plastic Transition Fittings				X
56-70.1	Risers - Service, Anodeless				X
56-70.16	Riser - Service Head Adapter				X
57-15	Canopies, High Pressure				X
58-08	Excess Flow Valve Assemblies				X
58-10	Valves - Thermoplastic				X
58-15.2	Valves; Ball, Steel Floating				X
58-70	Valves - Plug, Lubricated, Positive Shut-Off				X
58-82	Valves - Ball, Steel, Trunnion Mounted				X
58-96.6	Valve - Relief, Large				X
677-1	Pipeline Condition and Maintenance Report	X			
70-45	Regulator - Service, Standard Pressure				X
70-47	Regulators - High Pressure Spring Loaded				X
76-72	Odorant - 50/50 TBM/THT	X			
76-73	Thiophane Odorant	X			
76-95	Pressure Vessels				X
78-01	Meters - Diaphragm				X
78-02	Meters - Rotary				X
ACF	Assessment Completion Form	X			
CCM.1	The Storage Corrosion Control Manual	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			

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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
PP01.001	Management of Company Operations Standards				X
PP02.018	Material Tracking and Traceability Levels	X			
PP02.019	Material Quality Assurance (QA) – Procedures and Guidelines	X			
QUALPRO G	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			

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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			

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