

ALJ-274 Process

SoCalGas and SDG&E

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August 1, 2013



Southern
California
Gas Company



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Purpose

- To summarize SoCalGas' and SDG&E's approach to implementing Resolution ALJ-274.
 - Avenues for Reporting to SED
 - Self-Reporting and Citation Reporting
 - ALJ-274 Timeline
 - Reporting Process
- Recommended Changes to ALJ-274

Avenues for Reporting to SED

1

Reporting per Part 191

A

Incident Reports

B

Safety Related Conditions

2

Reports Provided During Audits

3

Ad-hoc and Routine Reports

4

ALJ-274 Self-Reports



SDGE

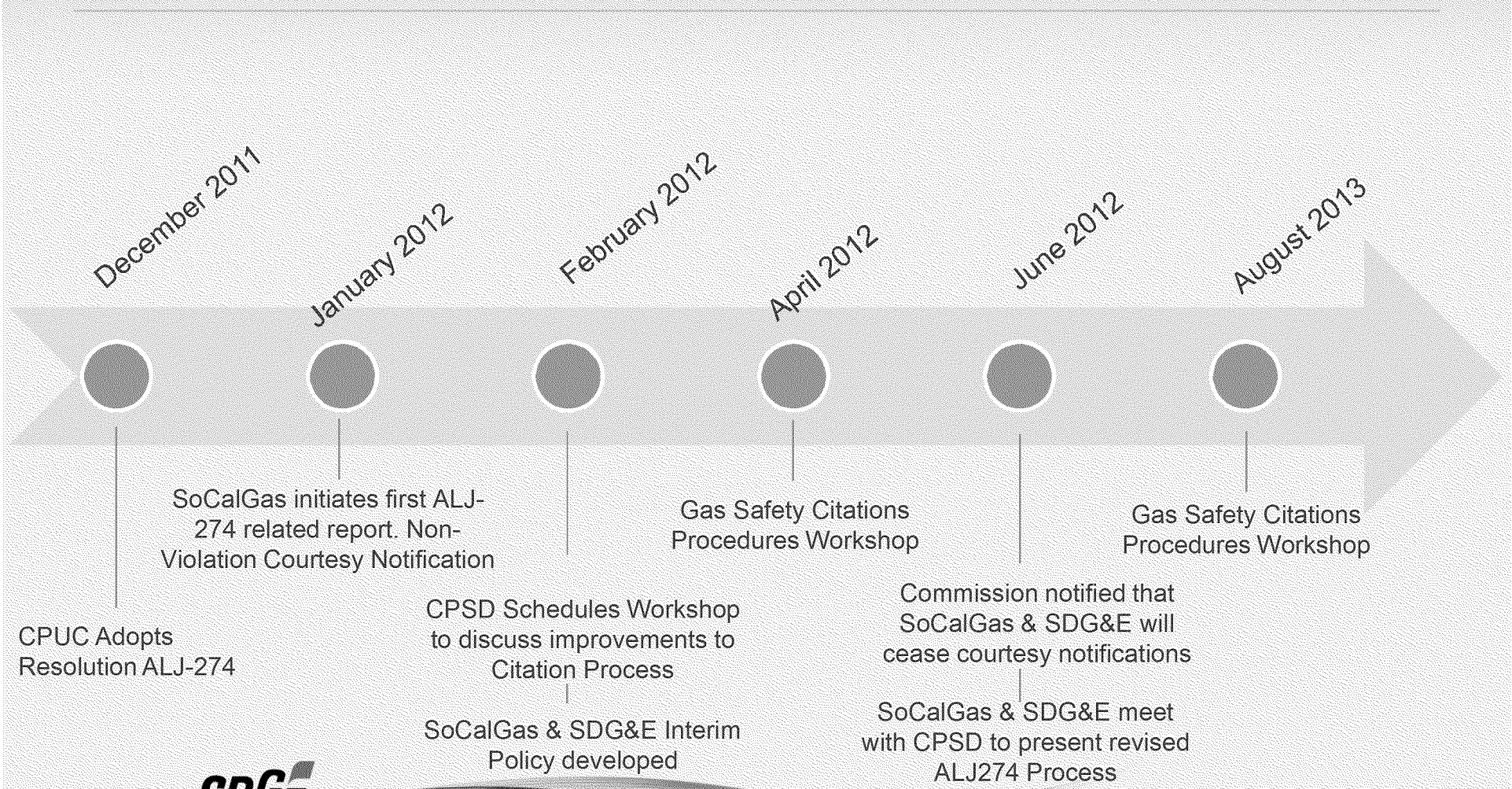
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Self-Reporting and Citation Reporting

- » ALJ274 Process includes both self reporting and citation reporting
- » City and County Notifications
 - Reporting duplication when a self-reported event leads to citation
 - Reports need to be made within 10 calendar days



ALJ-274 Timeline



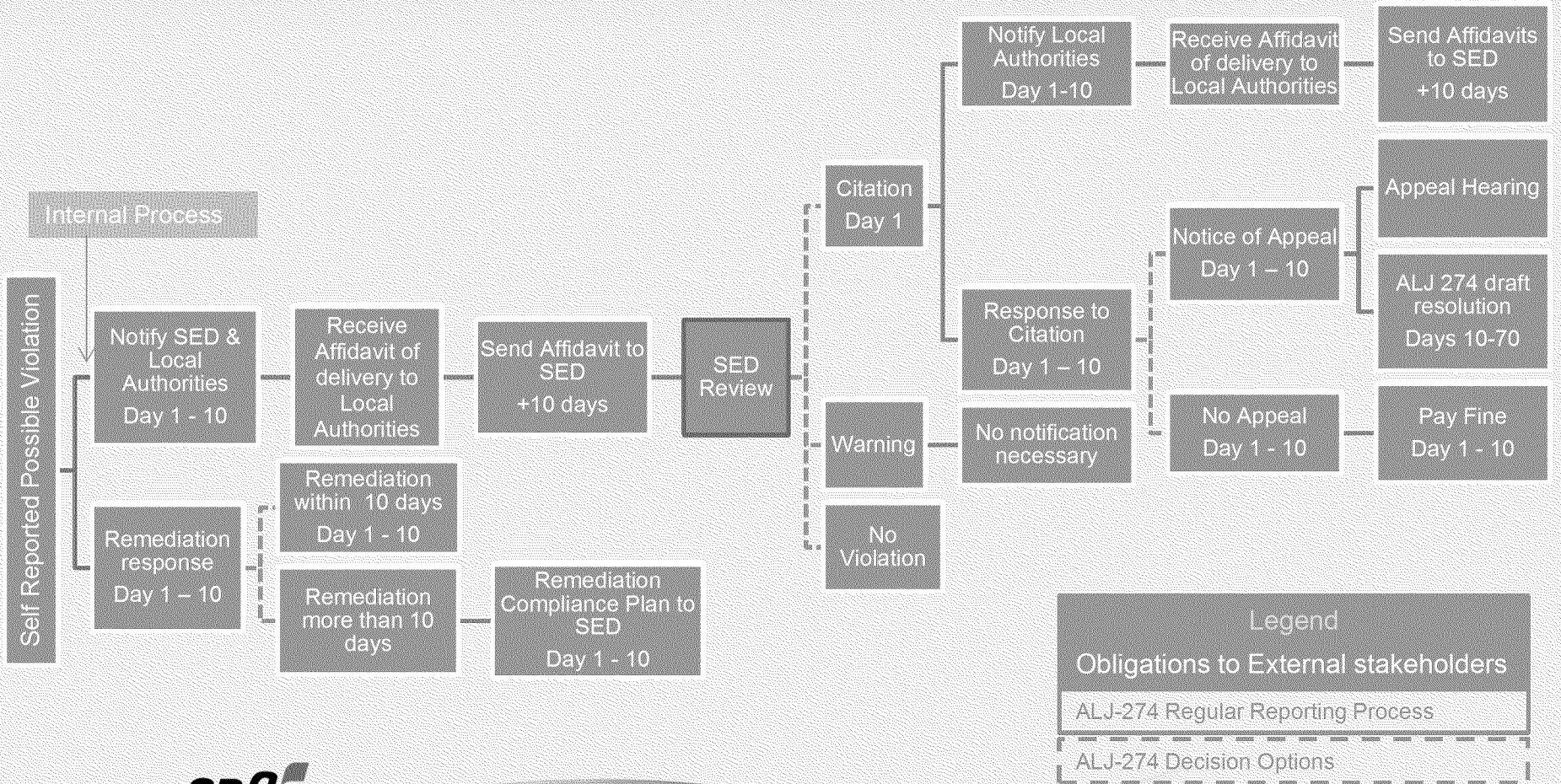
ALJ-274 Reporting Process

SoCalGas and SDG&E Self Report the following events when caused by a possible violation:

- A safety related condition (SRC), even if this condition has been corrected within 10 days of discovery and is not reportable per 49 CFR 191.
- A hazardous condition
- Other circumstance deemed significant



Self-Reported Possible Violation



Recommended Changes

Self- Reporting

- Encourage reporting transparency
 - Provide benefit or credit if escalates to a citation
- Provide criteria for notifying Local Authorities
- Use of declaration instead of affidavit
- Define 10 day window to be 10 business days

Citation

- Implement warning and cure period prior to monetary citation
- For citation event, initiated by a self-report
 - Provide a monetary credit
- Limit citation authority of staff
 - Cap on dollar amount
 - A continuous violation should be considered a single violation
 - Limit delegation authority to Director of SED
- Use of declaration instead of affidavit
- Define 10 day window to be 10 business days
- Consistent with PHMSA model

Questions?



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