

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 27, 2021

GI-2021-09-SWG-30-09

Jerry Schmitz
Vice President, Engineering
Southwest Gas Corporation
5241 Spring Mountain Road
Las Vegas, NV 89193-8510

SUBJECT: Closure letter for General Order (GO) 112-F Gas Inspection of Southwest Gas Company's Distribution Integrity Management Program (DIMP) – Follow up and review of DIMP Projects

Dear Mr. Schmitz,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission has reviewed response of Southwest Gas Corporation (SWG) dated December 8, 2021, for the findings identified during the General Order (GO) 112-F inspection of its Distribution Integrity Management Program (DIMP). The Inspection was conducted between September 20-24 and September 27 – October 1, 2021.

Included is SED's evaluation of SWG's response for identified Areas of Concern/Recommendations.

This letter serves as the official closure of the 2021 GO 112-F Inspection of SWG's Distribution Integrity Management Program.

Thank you for your cooperation in this inspection. If you have any questions, please contact Sikandar Khatri at (415) 703-2565 or by email at Sikandar.Khatri@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

cc:

Laurie Brown, Southwest Gas Company
Terence Eng, SED
Claudia Almengor, SED

Summary of Inspection Findings

Dates of Inspection: September 20-24 and September 27 – October 1, 2021

Operator: SOUTHWEST GAS CORP

Operator ID: 18536 (primary)

Inspection Systems: Distribution Integrity Management Program (DIMP)

Assets (Unit IDs) with results in this report: Main Office (Specialized Inspections) (88373)

System Type: GD

Inspection Name: SWG DIMP 2021

Lead Inspector: Sikandar Khatri

Operator Representative: Laurie Brown, Administrator/Compliance, Engineering Services

Unsatisfactory Results

No Preliminary Findings.

Concerns

Gas Distribution Integrity Management : Records Required to be Kept (GDIM.RC)

Question 3. Has the operator maintained the required records?

References 192.1011

Assets Covered Main Office (Specialized Inspections) (88373 (30))

Issue Summary A sample of DIMP (Distribution Integrity Management Program) related replacement project records were reviewed. The documents "WR Work Activity" (WR stands for Work Request) and "As-builts" were provided which do not list information about the "depth of cover" for mains. This was discussed with Southwest Gas (SWG) staff who mentioned that this is covered under the response "Yes" on the statement "SWG Standards Met" on "WR Work Activity" document. The "depth of cover" is an important parameter for gas pipelines, SWG documents it for service and transmission lines. SED recommends documenting "depth of cover" for mains on an appropriate document such as "As-builts" or "WR Work Activity". This could be either in the form of "longitudinal profile" showing depth of cover along the length of main or a statement verifying the minimum depth of cover of so many inches was maintained throughout the length of the main.

Southwest Gas Corporation (SWG) Response:

Southwest Gas appreciates SED's recommendation and is currently reviewing its as-built and work order processes for Distribution Main projects to determine the best method to document the installed minimum depth of cover. Once this review is completed, Southwest Gas will update its procedures and/or work orders to capture documentation verifying the minimum depth of cover for the project on new design projects going forward.

SED's Conclusion:

SED has reviewed SWG's response and will follow up on it in the next DIMP Inspection.