

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 10, 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: 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 conducted a General Order 112-F inspection of Southwest Gas Company's (SWG), Distribution Integrity Management Program (DIMP) between September 20-24 and September 27 – October 1, 2021. The Inspection entailed follow-up and review of DIMP projects.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records that SED inspected during the inspection. SED discovered one concern during the inspection which is outlined in the Summary.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by SWG to address the concern noted in the Summary.

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 "Terence Eng".

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

cc:

Laurie Brown, Southwest Gas Company
Dennis Lee, 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.