

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 13, 2022

GI-2022-10-SWG-33-02ABC

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

Dear Mr. Schmitz:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a **General Order (G.O.)112-F Comprehensive Operation and Maintenance Inspection of Southwest Gas Corporation's (SWG) Needles Natural Gas Distribution District (Inspection Unit)**, on October 24 through October 28 of 2022 for calendar years 2018 through 2021. SED used the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety's "Inspection Assistant Form" as a reference guide to conduct the inspection. SED reviewed records and conducted field inspections of SWG pipeline facilities in the Needles distribution district within the Inspection Unit. Also, SED's staff reviewed SWG's Inspection Unit Operator Qualification program, which included field observations of randomly selected individuals performing covered tasks.

SED's staff identified zero (0) violations of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, and identified two (2) areas of concern which are described in the attached "Post-Inspection Written Preliminary Findings".

At the end of this inspection, SWG provided adequate response to each concern item. Therefore, this letter also serves as official closure of the 2022 Comprehensive Operation and Maintenance Inspection of SWG Needles Natural Gas Distribution District.

Thank you for your cooperation in this inspection. If you have any questions, please contact Jordan Lin, Utilities Engineer, at (213) 248-5023 or by email at jordan.lin@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

Attachments: see Post-Inspection Written Preliminary Findings
cc: see next page

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Post-Inspection Written Preliminary Findings

Date of Transmittal: 12/09/2022

Dates of Inspection: 10/24/22 – 10/28/22

Operator: SOUTHWEST GAS CORP

Operator ID: 18536 (primary)

Inspection Systems: Needles District

Assets (Unit IDs) with results in this report: Needles District (87484)

System Type: GD

Inspection Name: SWG: Needles

Lead Inspector: Jordan Lin

Operator Representative: Laurie Brown

Unsatisfactory Results

No Preliminary Findings.

Concerns

Records: Operations And Maintenance (PRR.OM)

Question Title, ID Distribution Leakage Surveys, MO.RW.DISTPATROLLEAKAGE.R

Question 20. Do records indicate distribution leakage surveys were conducted as required?

References 192.603(b) (192.723(a), 192.723(b))

Assets Covered Needles District (87484 (33))

Issue Summary SED reviewed SWG's leak survey records (WR # 4156826; 3964395;3964422) and where a leak had been found during each of the surveys. Further review concluded that the leaks were on the customer's side and SWG notified their customer service team of the leaks. However, the leak survey records have no documentation showing that the leaks were found to be on the customer's side and was taken care of by SWG's customer service team. SED recommends that SWG update their work management system to allow better communication between their systems. This would allow documentation to clearly show where the leak was found and who holds responsibility for its repair.

10/28/22 - During the close out meeting for this inspection, SWG provided a response to this concern. SWG stated that they had recently updated its customer system and is in the process of updating its work management system, which may allow better communication between the two systems and may help to document if leaks discovered during leak survey are the operator's side or customer's side. SWG also

provided this same response in an email on 10/28/2022. SED acknowledges SWG's response to this concern and considers this concern closed.

Generic Questions: Generic Questions (GENERIC.GENERIC)

Question Title, ID Generic Question, GENERIC.GENERIC.GENRECORD.R

Question 3. Generic question - please provide context in result notes.

References N/A

Assets Covered Needles District (87484 (33))

Issue Summary During the records review of Pipe to Soil reads, SED came across several records where the completion crew was not shown on the work order. SWG responded stating this is due to an issue with the work management system and printing of reports as the crew does not exist when the order is reviewed in the system. SED suggests that SWG look into this issue and correct it in their system so future printed records do not have this issue.

10/28/2022 - During the close out meeting for this inspection, SWG provided a response to this concern. SWG stated that their system does record the employees who worked on these orders, but their printing process fails to print the completion crew onto the work orders. SWG also has stated that the employees who worked on the job have their identification code at the bottom of the page, which also acts as confirmation as to who worked on the job. SWG also provided this same response in an email on 10/28/2022. SED acknowledges SWG's response to this concern and considers this concern closed.