

PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 29, 2023

GI-2023-11-SWG-32-01

Jerry Schmitz  
Vice President/Engineering  
Southwest Gas Corporation  
8360 South Durango Road  
Las Vegas, NV 89113

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 Southwest Gas Corporation's (SWG) Victorville Natural Gas Transmission District (Inspection Unit)**, on November 13 through November 17, 2023. 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. The inspection included a review of SWG's records from January 1, 2019, through December 31, 2022 and field inspections of SWG's pipeline facilities in Victorville district. SED's staff also reviewed the implementation of SWG's Operator Qualification program, which included field observation of randomly selected individuals performing covered tasks.

SED staff identified zero (0) probable violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, and noted one (1) area of concern which is described in the attached "Post-Inspection Written Preliminary Findings".

At the end of this inspection, SWG provided adequate response to the concern item. Therefore, this letter also serves as official closure of the 2023 Comprehensive Operation and Maintenance Inspection of SWG Victorville Natural Gas Transmission 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 [JRN@cpuc.ca.gov](mailto:JRN@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.

SWG Victorville Transmission

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# Post-Inspection Written Preliminary Findings

**Dates of Inspection:** 11/13/23 – 11/17/23

**Operator:** SOUTHWEST GAS CORP

**Operator ID:** 18536 (primary)

**Inspection Systems:** Victorville District

**Assets (Unit IDs) with results in this report:** SWG - Transmission (88674)

**System Type:** GT

**Inspection Name:** Southwest Gas Transmission - Victorville

**Lead Inspector:** Jordan Lin

**Operator Representative:** Laurie Brown

## Unsatisfactory Results

**No Preliminary Findings.**

## Concerns

### Maintenance and Operations: ROW Markers, Patrols, Leakage Survey and Monitoring (MO.RW)

Question Title, ID Placement of ROW Markers, MO.RW.ROWMARKER.O (also presented in: PD.RW)

Question 3. Are line markers placed and maintained as required?

References 192.707(a) (192.707(b), 192.707(c), 192.707(d), 192.9(d), 192.9(e))

Assets Covered SWG - Transmission (88674 (98))

Issue Summary Title 49, CFR Part192, Section 192.707(d)(2) states:

*"The name of the operator and the telephone number (including area code) where the operator can be reached at all times..."*

SWG patrolling procedure section 2.1.3 states:

*"Line Markers shall display a company approved emergency phone number."*

On November 16, 2023, during a field inspection of SWG's facilities on Gasline Road, in the city of Victorville, SED observed a line marker, on a chain linked fence around SWG's Tap SA ID 12TPB5000279, had inactive phone number (██████████). According to SWG's patrolling record (WR# 4510280), the area was last patrolled on October 5, 2022, but SWG's employee failed to address the inactive phone number on the line marker.

SED recommends that SWG take the appropriate corrective actions to ensure the line marker has a valid 24-hour phone number responded to by SWG's personnel for compliance with Title 49 CFR, Part 192, §192.707(d)(2).

On November 17, 2023, SWG emailed SED some photographs of a new line marker with a new phone number. SED has reviewed SWG's response and accepts the corrective action that it has articulated and implemented. SED has called the new phone number (██████████) and reached SWG emergency response personnel and confirmed that the new number is active. SED acknowledges SWG's response to this concern and considers this concern to be closed.