

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



December 29, 2023

GI-2023-11-SWG-32-02

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 Distribution 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 Big Bear, Barstow, and Victorville districts. 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 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 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 Distribution

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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: Dist (Barstow, Victorville, Big Bear) (89837)

System Type: GD

Inspection Name: Southwest Gas Distribution - 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 13. Are line markers placed and maintained as required?

References 192.707(a) (192.707(b), 192.707(d), CGA Best Practices, v4.0, Practice 2-5, CGA Best Practices, v4.0, Practice 4-20)

Assets Covered Dist (Barstow, Victorville, Big Bear) (89837 (32))

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 Apple Valley Road, in the city of Apple Valley, SED observed a line marker at SWG's 850 read point, 12dcp0000004 CID 230, had inactive phone number (██████████). According to SWG's cathodic protection record (WR# 4412504), the crew conducted a cathodic protection pipe to soil read on April 11, 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 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.