



## **SOUTHWEST GAS CORPORATION**

Jerome T. Schmitz, P.E., Vice President, Engineering Staff

March 15, 2023

Mr. Terence Eng  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

**SUBJECT: General Order (G.O.) 112-F Inspection of Southwest Gas Company's Operation and Maintenance Procedures and Emergency Response Program Updates**

Dear Mr. Eng,

Southwest Gas Corporation (Southwest Gas or Company) respectfully submits the attached response to the Summary of Inspection Findings of SED's General Order 112-F inspection of the Company's Operations and Maintenance Procedures and Emergency Response Program updates, which was conducted between January 23 and January 27, 2023.

Southwest Gas appreciates Staff's consideration of this matter. Please do not hesitate to contact me if there are any questions or concerns.

Sincerely,

Jerome T. Schmitz, P.E.  
Vice President, Engineering Staff

cc: Kevin Lang  
Valerie Ontiveroz  
Dennis Lee, CPUC  
Victor Muller, CPUC

Jason R. McMillan, CPUC  
Matthewson Epuna, CPUC  
Claudia Almengor, CPUC



## Post-Inspection Written Findings

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**Date of Transmittal:** 02/06/2023

**Dates of Inspection:** 1/23/2023-1/27/2023

**Operator:** SOUTHWEST GAS CORP

**Operator ID:** 18536 (primary)

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

**System Type:** GD

**Inspection Name:** 2023 Southwest Gas (SWG) O&M/ER Updates (Distribution)

**Lead Inspector:** Victor Muller

**Operator Representative:** Laurie Brown

## Unsatisfactory Results

**No Preliminary Findings.**

## Concerns

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

Question Title, ID Distribution Leakage Surveys, MO.RW.DISTLEAKAGE.P (also presented in: PD.RW)

Question 10. Does the process require distribution system leakage surveys to be conducted?

References 192.723(a) (192.723(b))

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

Issue Summary California General Order (GO) 112F, subpart 143.2(c)(1) states, "Each Operator must reevaluate Grade 3 leaks during the next scheduled survey, or within fifteen months of the reporting date, whichever occurs first. Thereafter, the leak must be



reevaluated every calendar year, not to exceed 15 months until the leak is repaired, regraded or no longer results in a reading."

Section 1.6.5 of SWG's Office of Pipeline Safety (OPS) - Leak Survey Procedure provides SWG's standards for follow-up on aboveground Grade 3 leaks stating, "Class 3 leaks must be repaired within 12 months, not to exceed 15 months, from the date of discovery".

SWG has no reevaluation procedures for aboveground Grade 3 leaks. Therefore, SWG's procedures should require the repair of any aboveground Grade 3 leaks before a reevaluation would be required by GO-112F. A survey could be scheduled or may be required by Title 49 CFR Part 192 to be completed, prior to 15 months after the discovery of an aboveground Grade 3 leak. SED recommends that SWG revise section 1.6.5 of SWG's OPS - Leak Survey Procedure to ensure that a reevaluation required by GO 112F, subpart 143.2(c)(1) is not missed.

### Southwest Gas Response:

Southwest Gas acknowledges SED's recommendation and is currently reviewing the Leak Survey Procedure, Section 1.6.5, for revision to include a reevaluation requirement to ensure compliance with GO 112F. A revision to the procedure will be included in the third quarter Operations Manual release in September 2023.