



# SOUTHWEST GAS CORPORATION

December 8, 2021

*Via Email*

Mr. Terence Eng, P.E.  
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 (GO) 112-F Gas Inspection of Southwest Gas Company's Distribution Integrity Management Program (DIMP) - Follow up and review of DIMP Projects**

Dear Mr. Eng,

Southwest Gas Corporation (Southwest Gas or Company) respectfully submits the attached response to the Safety and Enforcement Division (SED) of the California Public Utilities Commission regarding the SED's Summary of Inspection Findings of General Order 112-F inspection of the Company's Distribution Integrity Management Program conducted between September 20-24, 2021 and September 27 - October 1, 2021.

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

/sms

cc: Brad Harris  
Chris Sohus  
Kevin Lang

Valerie Ontiveroz  
Dennis Lee, CPUC  
Claudia Almengor, CPUC



## 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.

**Southwest Gas Response:**

Southwest Gas appreciates SED’s recommendation and is currently reviewing its as-built and work order processes for Distribution Main projects to determine the best method to document the installed minimum depth of cover. Once this review is completed, Southwest Gas will update its procedures and/or work orders to capture documentation verifying the minimum depth of cover for the project on new design projects going forward.