

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 22, 2016

GI-2015-10-SWG-32- 02A

Jerry Schmitz  
Vice President/Engineering  
Southwest Gas Corporation  
P.O. Box 98510, LVA-581  
Las Vegas, NV 89193-8510

SUBJECT: General Order 112 Inspection of Southwest Gas Corporation, Southern California Division

Dear Mr. Schmitz:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission, conducted a General Order 112<sup>1</sup> inspection of Southwest Gas Corporation (SWG) from October 19 through 23, 2015. The inspection included a review of corrosion control records for the period of 2013 through 2014. A representative sample of SWG facilities and the right of way were also inspected.

A Summary of Inspection Findings (Summary), which contains probable violations and areas of concerns and recommendations identified by SED staff, is included as an attachment to this letter.

Please provide a written response indicating the measures taken by SWG to address the probable violations and areas of concerns and recommendations within 30 days from the date of this letter. SED will notify SWG of the enforcement actions it plans to take in regard to each of the violations found during the inspection, pursuant to Commission Resolution ALJ-274, after it has an opportunity to review SWG's response to the findings included in the Summary.

If you have any questions, please contact Alin Podoreanu at (916) 928-2552 or by email at [alin.podoreanu@cpuc.ca.gov](mailto:alin.podoreanu@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

cc: Laurie Brown, SWG Administrator/Staff Compliance  
Michael Clausell, Manager/Engineering

<sup>1</sup> General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 15-06-044.

## SUMMARY OF INSPECTION FINDINGS

### **A. Probable Violations**

1. Title 49 Code of Federal Regulations (CFR) §192.465 (a) states:

*“Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of §192.463. However, if tests at those intervals are impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.”*

- a. SED reviewed external corrosion control monitoring records for separately protected steel sections. Construction records indicated that the steel section at 28222 Waterman (11CIS0087903) in District 11 was installed in 1975. SWG failed to provide records to demonstrate it monitored this separately protected steel section in accordance with Title 49 CFR §192.465(a) between 1975 and 2013.
- b. SED reviewed external corrosion control monitoring records for separately protected steel sections. Construction records indicated that the steel section at 42641 Willow Avenue (13CIS0088421) in District 13 was installed in 1977. SWG failed to provide records and demonstrate it monitored this separately protected steel section in accordance with Title 49 CFR §192.465(a) between 1977 and 2013.

SWG is therefore in violation of Title 49 CFR §192.465 (a). Please advise SED whether the aforementioned steel sections are safe to operate and if further action is necessary.

### **B. Areas of Concern and Recommendations**

1. Title 49 Code of Federal Regulations (CFR) §192.463(a) states:

*“Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in Appendix D of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.”*

During the field inspection, SWG discovered a pipe-to-soil potential of -775mV at 13491 Tioga Road, Apple Valley, CA. This level of protection may not meet the applicable criteria contained in Appendix D of Part 192. Please provide the SWG’s plan for corrective action.