

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 9, 2026

GI-2025-09-SWG-30-09

Kevin Lang
Vice President, Engineering Staff
Southwest Gas Corporation
8360 South Durango Road
Las Vegas, NV 89113

SUBJECT: SED Closure Letter - General Order (GO) 112-F Gas Inspection of Southwest Gas Company - Distribution Integrity Management Program, DIMP

Dear Mr. Lang,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112-F inspection of the Distribution Integrity Management Program (DIMP) of Southwest Gas Company's (SWG) Gas Distribution System in the State of California. The inspection took place from September 8-12 and 15-19, 2025.

A summary of the inspection findings documented by SED, SWG's response to our findings, and SED's evaluation of SWG's response taken for each identified finding is attached.

This letter serves as the official closure of the 2025 GO 112-F inspection of SWG's Distribution Integrity Management Program (DIMP).

If you have any questions, please contact Sikandar Khatri at (415) 703-2565 or by email at Sikandar.Khatri@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Closure letter

cc:

Brooke Bachmann, Southwest Gas Company
Terence Eng, SED
Claudia Almengor, SED

Summary of Inspection Findings

Dates of Inspection: September 8-12 and 15-19, 2025

Operator: SOUTHWEST GAS CORP

Operator ID: 18536 (primary)

Inspection Systems: Distribution

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

System Type: GD

Inspection Name: 2025 - SWG DIMP Inspection

Lead Inspector: Sikandar Khatri

Operator Representative: Brooke Bachmann

Unsatisfactory Results

No Preliminary Findings.

Concerns

Gas Distribution Integrity Management : Plan Implementation (GDIM.IM)

Question Title, ID Plan Implementation - Data Sources, GDIM.RA.SOURCES.P

Question 2. Do the procedures identify or reference the appropriate sources used to determine certain characteristics (e.g., Design, Operating Conditions, Operating Environmental Factors) necessary to assess the threats and risks to the pipeline?

References 192.1007(a)(1)

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

Issue Summary SED reviewed SWG's DIMP Plan. Section 5.1.1 of the DIMP Plan states that SWG utilizes its knowledge of its pipelines, including physical make-up and components and the operating and maintenance history to determine threats and assess risk. The additional examples and a list of sources used are provided in section 5.1.3 and Table 2: DIMP Records Summary.

One column in DIMP Table 2 has the title "Extent of Missing Records" and it has entries either "Unknown" or "None". The term "Unknown" indicates that SWG does not know how many records are missing. It is understandable that SWG may not have all information but should know the extent of missing records. Therefore, SWG should revisit the title of column "Extent of Missing Records" or entry "Unknown" to reflect the actual status.

SWG's Response:

Southwest Gas acknowledges SED's recommendation to revise the Operations Manual, Distribution Integrity Management Plan, Table 2, to address the title of columns "Extent of

Missing Records” or entry “Unknown” to reflect the actual status of the records. Southwest Gas will conduct a review of Table 2 to confirm that the language used is consistent and clearly conveys the intent of the table in relation to 49 CFR Part 192, Subpart P requirements.

The review and any associated updates will be completed by September 30, 2026.

SED’s Response:

SED has reviewed the response and accepted the same.

Gas Distribution Integrity Management : Knowledge of the System (GDIM.KN)

Question Title, ID System Knowledge - Information Considered, GDIM.RA.INFORMATION.P

Question 1. Do the procedures require the consideration of information gained from past design, operations, and maintenance (e.g., O&M activities, field surveys, One-Call system information, excavation damage, etc.)?

References 192.1007(a)(2)

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

Issue Summary SED reviewed SWG's DIMP Plan. Section 5.1.3.1 of the DIMP Plan states that the Company uses information from the records indicating pipe type, miles of main, number of services, leak history, damage history, corrosion control records, patrolling records, continuing surveillance, maintenance history, and incident records when determining threats and assessing risk.

Section 5.1.3.1 lists the length of mains (in miles), but for services only the number of services is mentioned and the characteristics such as length, diameter etc. are missing, which are important for threat and risk assessment. During discussion, SWG staff mentioned that it is to align with Annual DOT report terminology (Distribution form 7100.1-1). The DIMP Plan requirements do not restrict only the use of Annual DOT Reporting terminology. SWG should revise the language in this paragraph to reflect the important parameters of the mains and services which are used for threat and risk analysis.

SWG’s Response:

Southwest Gas respectfully acknowledges SED’s recommendation to revise Section 5.1.3.1 of the Operations Manual, Distribution Integrity Management Plan, to include language specifying the parameters of mains and services used in threat and risk analysis. Southwest Gas will update this section to explicitly include service mileage, which is an input in the Company’s annual Leak Rate Analysis where threat trends for various pipeline material families are analyzed. Updates to this section will be completed by September 30, 2026.

SED’s Response:

SED has reviewed the response and accepted the same.

Gas Distribution Integrity Management : Records Required to be Kept (GDIM.RC)

Question Title, ID Records - Requirements, GDIM.QA.RECORDREQUIREMENTS.P

Question 1. Are there procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?

References 192.1011

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

Issue Summary SWG's DIMP Plan, section 13 "Document and Record Retention" outlines the records that will be retained by System Integrity for at least ten years.

However, the Code section §192.1011 uses the language 'maintain records' whereas SWG's DIMP Plan section 13 uses the word 'retain'. SWG should use the word "maintain" as referred into the Title 49 Code of Federal Regulations §192.1011.

SWG's Response:

Southwest Gas acknowledges SED's recommendation and has updated Section 13 of the Distribution Integrity Management Plan to replace the term "retain" with "maintain," in accordance with Title 49 CFR §192.1011. This revision will take effect on January 31, 2026.

SED's Response:

SED has reviewed the response and accepted the same.