

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 12, 2025

GI-2025-09-SWG-30-09

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

SUBJECT: 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.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records that SED inspected during the inspection. SED discovered three concerns during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by SWG to address the finding noted in the Summary.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Terence Eng".

Terence Eng, P.E.  
Program Manager  
Gas Safety and Reliability Branch Safety  
and Enforcement Division

Enclosure: Summary of Inspection Findings

cc:

Brooke Bachmann, Southwest Gas Company  
Dennis Lee, 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.

# 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.

# 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.