



## SOUTHWEST GAS CORPORATION

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

August 19, 2016

Kenneth Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
320 West 4<sup>th</sup> Street, Suite 500  
Los Angeles, CA 90013

**Subject: Southwest Gas Corporation response to Summary of Inspection Findings from General Order 112 Inspection of the Southern California Division conducted October 19-23, 2015.**

Dear Mr. Bruno:

Southwest Gas Corporation respectfully submits the following response to the Summary of Inspection Findings dated July 22, 2016. The response and accompanying attachments address one (1) Probable Violation, and one (1) Area of Concern and Recommendation identified by SED during the inspection.

We appreciate SED's consideration of this matter. Please do not hesitate to contact me if there are any questions or concerns.

Sincerely,

cc: A. Podoreanu (CPUC)  
K. Tong (CPUC)  
C. Mazzeo (SWG)  
E. Trombley (SWG)  
K. Lang (SWG)  
L. Brown (SWG)  
V. Ontiveroz (SWG)  
M. Clausell (SWG)



## 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.

### Southwest Gas Response

Both of the above-referenced segments are operating safely. Southwest Gas acknowledges that documentation is not available for the separately protected steel section at 28222 Waterman in District 11 (11CIS0087903, installed in 1975) between 1975 and 2013. The Company also acknowledges that documentation is not available for the separately protected steel section at 42641 Willow Avenue in District 13 (13CIS0088421, installed in 1977) between 1977 and 2013. The segment in District 11 was replaced with polyethylene (PE) pipe October 22, 2015, and the segment in District 13 was replaced with PE August 27, 2015. Accordingly, Southwest Gas does not believe any further actions are necessary with respect to these steel sections.



**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.

**Southwest Gas Response**

Southwest Gas discovered a pipe-to-soil read of -775mV (-0.775V) at 13491 Tioga Road on October 19, 2015. On November 11, 2015, the Company remediated this issue by installing three (20#) anodes. The pipe-to-soil read was -1.33V following the installation – which falls within the acceptable range (-0.850V to -2.500V) set forth in the Company’s Operations Manual.