

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission's Own Motion to Adopt New
Safety and Reliability Regulations for
Natural Gas Transmission and Distribution
Pipelines and Related Ratemaking
Mechanisms.

Rulemaking 11-02-019
(Filed February 24, 2011)

**OPENING COMMENTS
OF
SOUTHWEST GAS CORPORATION (U 905 G)
REGARDING THE REPORT OF THE INDEPENDENT REVIEW PANEL
ON THE SAN BRUNO INCIDENT**

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10 **ON THE SAN BRUNO INCIDENT**

11 On June 8, 2011, the Report of the Independent Review Panel (IRP) - San Bruno
12 Explosion (Report) that was prepared for the California Public Utilities Commission (CPUC
13 or Commission) was released. Through the Scoping Memo and Ruling of the Assigned
14 Commissioner issued on June 16, 2011, parties were advised of the opportunity to file
15 comments on or before July 15, 2011, regarding the IRP Report. Southwest Gas
16 Corporation (Southwest Gas or Company) has reviewed the IRP Report, and submits the
17 opening comments attached hereto as Exhibit A.

18 Southwest Gas appreciates the opportunity to provide comments on the IRP Report
19 and will continue to participate in this proceeding.

20 Dated this 15th day of July, 2011, at Las Vegas, Nevada.

21 **SOUTHWEST GAS CORPORATION**

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1 **EXHIBIT A**

2 **COMMENTS**

3 **I.**

4 **INTRODUCTION**

5 In developing the Report, representatives of the IRP visited Southwest Gas to
6 obtain insight on its management structure and operations related to transmission integrity
7 management. This was a welcomed opportunity as Southwest Gas has worked diligently
8 in establishing and refining its integrity management processes and procedures over the
9 years, particularly since the federal transmission integrity management regulations went
10 into effect in 2003. Southwest Gas has reviewed the IRP Report and submits the following
11 Comments regarding the recommendations to the Commission contained in the Report.

12 **II.**

13 **DISCUSSION**

14 Southwest Gas believes that many of the recommendations contained in the Report
15 are meritorious. Some of the recommendations, however, may be unnecessary given that
16 enforcing existing integrity management regulations and utilizing current regulatory
17 oversight mechanisms can accomplish the same objectives intended by the
18 recommendations. Specific examples are provided below, referenced by recommendation
19 number (to the CPUC).

20 1.15 *Recommendations, Page 30: Advise relevant lawmakers of the information*
21 *contained in Appendix L regarding the complex issues associated with*
22 *automatic shutoff and remote valves and request sponsors suspend*
23 *legislative proposals that would require the use of such valves until such*
time as the detailed plans of the utilities for integrity management have
been reviewed and approved by the CPUC.

24 Southwest Gas fully supports this recommendation.

25 6.3.3.1 *The CPUC should develop a plan and scope for future annual California*
26 *utility initiated independent integrity management program audits. The*
27 *results of these audits should be used to provide a basis for future CPUC*
28 *performance based audits on a three-year basis.*

1 Current federal transmission integrity management regulations require operators to
2 continually review their programs for improvement, but provide flexibility in how the review is
3 conducted. Southwest Gas believes that a utility-initiated independent audit is but one
4 approach to address a continual review, but the audit should not be utilized as a tool for the
5 Commission. The Commission has existing tools for evaluating operator programs, namely
6 the training, protocols, forms, FAQs, and incident and leak data, provided by the Pipeline
7 and Hazardous Materials Administration (PHMSA). The Commission can utilize these
8 resources in conjunction with information obtained from its own inspections of operators'
9 integrity programs, to develop performance-based audits.

10 6.3.3.3 *The CPUC should consider requiring the major regulated utilities operating in*
11 *the State of California to submit the results of the independent integrity*
12 *management audits as part of their respective rate case processes.*

13 As mentioned in the comment to 6.3.3.1, the independent audit is but one approach to
14 address a continual review of an operator's integrity management program. Operators
15 should be allowed to allocate resources and conduct independent audits at intervals most
16 beneficial to ensuring the quality of their respective programs.

17 6.3.3.6 *To raise the profile of the audits among all the stakeholders, add the*
18 *following requirements to the safety and pipeline integrity audits of the*
19 *utilities that includes the following features: (1) posting of audit findings and*
20 *company responses on the CPUC's website; (2) use of a "plain English"*
21 *standard to be applied for both staff and operators in the development of*
22 *their findings and responses, respectively; and (3) a certification by senior*
23 *management of the operator that parallels that certification now required of*
24 *corporate financial statements pursuant to Sarbanes-Oxley.*

25 Regarding the certification in item (3), it is unclear as to what is being certified by senior
26 management. If it is certification that an audit has been conducted or that certain processes
27 were followed, then this can likely be supported. However, Southwest Gas notes that
28 existing federal integrity management regulations require that programs specify roles and
responsibilities for the implementation and oversight of the processes and procedures
involved. This recommendation appears to be redundant in light of the existing code
requirements.

1 6.7.3.1 *The CPUC should seek to align its pipeline enforcement authority with that*
2 *of the State Fire Marshal's by providing the CPSD staff with additional*
3 *enforcement tools modeled on those of the OSFM and the best from other*
4 *states.*

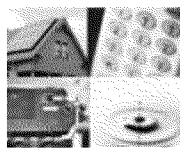
4 Based on the information provided, the potential impact of this change is unclear; therefore,
5 Southwest Gas cannot comment at this time. Southwest Gas suggests that if the
6 Commission seeks to adopt this recommendation, it should provide specific information as
7 to the "additional enforcement tools" to be implemented, and allow the parties an
8 opportunity for further comment.

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this day served the foregoing OPENING COMMENTS
3 OF SOUTHWEST GAS CORPORATION (U 905 G) REGARDING THE REPORT OF THE
4 INDEPENDENT REVIEW PANEL ON THE SAN BRUNO INCIDENT upon the individuals
5 on the established service list in proceeding R.11-02-019 by electronic mail (email) service.
6 Those individuals without an email address were served by regular, first-class mail.

7 Dated this 15th day of July, 2011 at Las Vegas, Nevada.

8
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