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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)**

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1 **BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

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

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6 **OPENING COMMENTS**
7 **OF**
8 **SOUTHWEST GAS CORPORATION**
9 **(U 905 G)**

9 On February 24, 2011, the California Public Utilities Commission ("Commission")
10 issued an Order Instituting Rulemaking ("OIR") on the Commission's Own Motion to Adopt
11 New Safety and Reliability Regulations for Natural Gas Transmission and Distribution
12 Pipelines and Related Ratemaking Mechanisms in an effort to establish a new model of
13 natural gas pipeline safety regulation applicable to all California pipelines. The Commission
14 requested that parties file opening comments on or before April 11, 2011.¹

15 Southwest Gas Corporation is a named respondent in this proceeding, and in
16 accordance with Rule 6.2 of the Commission's Rules of Practice and Procedure, hereby
17 submits opening comments concerning the issues contained in the OIR, a copy of which is
18 included herewith as Exhibit A.

19 Southwest Gas appreciates the opportunity to provide comments and looks
20 forward to actively working with the Commission and other utilities in addressing the topics
21 identified in this proceeding.

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28 ¹ This deadline was later extended to April 13, 2011 per the April 7, 2011 Assigned Commissioner's Ruling revising the schedule for filing comments on the OIR *et al.*

1 Dated this 13th day of April, 2011, at Las Vegas, Nevada.

2 SOUTHWEST GAS CORPORATION

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EXHIBIT A

**OPENING COMMENTS OF
SOUTHWEST GAS CORPORATION**

Southwest Gas is a natural gas local distribution company that serves over 182,000 customers in California. Southwest Gas owns and operates about 14.5 miles of intrastate transmission pipelines, 3,114 miles of distribution mains and 2,452 miles of services in California.

In this rulemaking, the Commission proposes to adopt revised or new safety and reliability regulations for natural gas transmission and distribution pipelines, and related ratemaking mechanisms. Southwest Gas fully supports the Commission’s interest in maintaining and carefully monitoring pipeline infrastructure to ensure safe and reliable delivery. Southwest Gas also supports smart modernization, new technologies and sharing information among operators, emergency responders, the public and the Commission to enhance pipeline safety. However, Southwest Gas notes that there are several initiatives currently underway that are likely to affect federal pipeline safety rules in the near future. First there are several significant Bills under discussion in Congress regarding Pipeline Safety Reauthorization. Each of these proposed Bills require substantive changes to Federal pipeline safety regulations. Secondly there is the National Transportation Safety Board (NTSB) and Pipeline and Hazardous Materials Safety Administration (PHMSA) investigation of the San Bruno, California incident – both of which are noted in the OIR. If the NTSB maintains its typical format, its final report will draw conclusions as to the root cause(s) of the incident and then will make recommendations to several stakeholders, most likely PHMSA, the Commission, and PG&E (if not all pipeline operators). It is reasonable to assume that those recommendations will include proposed changes to both federal and state pipeline safety regulations. Finally, there are the Commission's own efforts, through the Independent Review Panel (Panel), to determine the root cause(s) of the San Bruno incident and to explore the Commission's regulatory and enforcement processes. The Commission recognizes that these other initiatives are currently underway and that there is a relationship between them and this OIR. In fact, the Commission’s charge to its Panel is “...to make a technical assessment of the events surrounding the

1 San Bruno incident, determine the root causes, and offer recommendations for action by
2 the Commission to best ensure such an accident is not repeated elsewhere.” In light of
3 these parallel initiatives, Southwest Gas is concerned that they have the potential to
4 overlap, and possibly conflict with one another. Given the anticipated release of the
5 Panel’s findings in May or June and the results of the NTSB final investigation expected in
6 the Fall, Southwest Gas recommends that the Commission consider developing this
7 rulemaking in phases, with the first phase to begin with the consideration of the final NTSB
8 report – to help ensure a coordinated effort and to avoid overlap and conflict among these
9 initiatives.

10 Southwest Gas also offers the following comments and observations on several
11 specific topics raised in the OIR:

12 • **Comprehensive Catastrophic Risk Assessment.**

13 Southwest Gas believes the transmission and distribution integrity management
14 regulations and procedures, which are the result of many years of experience and
15 knowledge, are adequate. Southwest Gas further believes that operators are in the best
16 position to perform risk assessments on their pipelines. The Commission has oversight of
17 the operators’ assessments through its regulatory responsibilities. Southwest Gas firmly
18 believes that an operator should be responsible for its own system with prudent oversight
19 by the regulatory agency.

20 • **Ratemaking and Other Incentives for Prudent Utility Operations**

21 As noted in the OIR, any effort to pursue the stated primary objectives, including
22 increasing infrastructure replacement or retrofitting existing facilities must take into account
23 ratemaking and other incentives for prudent utility operations, including customer impact
24 and the appropriate cost-recovery mechanism.

25 • **Local Emergency and Disaster Preparedness**

26 Southwest Gas welcomes Commission involvement in the Public Education
27 Program, especially to strongly encourage first-responders to attend periodic liaison
28 meetings. Natural gas transmission and distribution operators are required by federal

1 regulation to hold such meetings with local first-responders, but have no authority to
2 ensure their attendance. Southwest Gas agrees that designated utility contacts are
3 important. Southwest Gas does not recommend that an operator provide special tools to
4 emergency responders or local authorities to operate the pipeline system in an emergency.
5 Southwest Gas' experience has been that training provided to emergency response
6 persons in conjunction with training of its own crews and use of the Incident Command
7 System is the best approach to be prepared for such events.

- 8 • **Proceeding Category and Need for Hearing.**

9 Based upon the definitions provided in Rule 1.3, specifically Rule 1.3(d) and 1.3(e),
10 it is unclear to Southwest Gas why this proceeding was determined to be ratesetting in
11 nature, as opposed to quasi-legislative. Perhaps certain aspects of this proceeding should
12 be carved out of this OIR and set for their own quasi-legislative proceeding pursuant to
13 Rule 1.3(d) – namely several of the topics identified in Attachment B to the OIR.

14 **Attachment A -** 15 **Proposed Rules for Immediate Implementation**

16 Southwest Gas offers the following comments in regard to Attachment A –
17 Proposed Rules for Immediate Implementation. As noted above, Southwest Gas
18 encourages the Commission to wait until the results of the NTSB final report are known
19 and the current Pipeline Safety reauthorization is complete before considering these
20 proposed rules for all operators. Notwithstanding, Southwest Gas provides the following
21 comments.

22 **1. Section 145**

23 Section 145 applies specifically to Pacific Gas and Electric. Should the scope of
24 this section change, Southwest Gas respectfully requests to reserve its right to comment
25 on the proposed change at that time.
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1 **2. Proposed Revisions to Reporting Requirements in General Order 112-E,**
2 **Section 122.2.**

3 **A. Section 122.2(a)1.i**

4 Southwest Gas recommends that the new PHMSA definition of incidents in 49 CFR
5 191.3 be used in order to provide consistency between GO 112E and the federal
6 regulation.

7 **B. Section 122.2(a)4**

8 The term “under-pressure” should be defined to clarify between acceptable and
9 unacceptable pressures, as pressures may fluctuate throughout the year as a result of
10 varying gas demands. Furthermore, the phrase “any other event” needs clarification as
11 well because an operator may choose to shut down a portion or all of a pipeline to facilitate
12 normal construction and maintenance activities. Absent clarification, this would likely result
13 in burdensome documentation and reporting requirements.

14 **C. Section 122.2(d)5**

15 Southwest Gas recommends that Section 122.2(d)5 should be consistent with
16 Section 122.2(a)3 by including similar language regarding “plus the allowable limitations.”
17 Furthermore, both of these references should be consistent in the context of 49 CFR
18 192.201.

19 **D. Section 122.2(d)6**

20 Please refer to the comments in refer to Section 122.2(a)4, as Southwest Gas
21 maintains the same concern.

22 **E. Section 125.4(b)**

23 This Section presupposes that only casing and/or bridging are acceptable methods
24 to address locations where minimum cover will be less than specified in §192.327.
25 Southwest Gas recommends that Section 125.4(b) also provide for other methods to
26 alleviate minimum cover concerns. Southwest Gas suggests the following language
27 “...reasons for the casing, bridging, or other methods as appropriately designed, where the
28 minimum cover will be less than specified in §192.327.”

1 192.615(b) (3), which the Commission has adopted in GO 112E. This regulation requires
2 an operator to: “[R]eview employee activities to determine whether the procedures were
3 effectively followed in each emergency.”

4 **4. Requirement for the gas quality monitoring**

5 Southwest Gas encourages the Commission to consider the fact that 49 CFR Part
6 192, Subpart I and Subpart O require monitoring for internal corrosion. As such, a new
7 rule requiring a program to monitor, analyze, and prevent liquid intrusion and sulfur buildup
8 in its pipeline system may not be necessary to ensure against equipment failure.

9 **5. Test requirements for pipelines operating below 100 psig and service lines**

10 Southwest Gas encourages the Commission to consider the existing testing
11 requirement in 49 CFR 192.511 prior to proposing a new rule. In addition, Southwest Gas
12 suggests that the pressure test requirements be defined for pipelines 60 psig and under,
13 for which most distribution systems are designed, or for pipelines over 60 psig, and not
14 make the breakpoint at 100 psig, which would be consistent with the requirement in
15 Government Code 4216(e) for a “High priority subsurface installation.”

16 **6. Clearance between gas pipelines and other subsurface structures**

17 As noted in the Staff’s rationale, GO 128 applies to construction of underground
18 electric supply and communication systems. This is an example of changes to a regulation
19 that may affect other non-gas utilities and for which a separate rulemaking may be more
20 appropriate. In addition, the Commission should also consider clearance requirements for
21 other utilities, such as “wet” utilities, as well as “design” considerations for clearance before
22 any work is done in the field.

23 **7. Incorporating One-Call Law requirements for marking underground facilities**

24 Southwest Gas operates gas pipeline facilities in Arizona, California, and Nevada.
25 Both Arizona and Nevada have aggressive enforcement programs in excavation damage,
26 which Southwest Gas believes have resulted in significant declines in the damages per
27 1,000 notification tickets. Southwest Gas supports strengthening the Commission’s
28 excavation damage program and is supportive of the Commission taking an active role in

1 the local and regional activities promoting damage prevention, including enforcement. All
2 subsurface facilities, regardless of private or public ownership, should be subject to the
3 excavation damage laws and regulations without any exemptions. Southwest Gas firmly
4 believes that exemptions in Government Code §§4216.1 and 4216.8 should be eliminated,
5 and that enforcement action alone would greatly improve prevention of excavation
6 damage. Southwest Gas also recommends that an enforcement process is better handled
7 through a Commission or peer-review procedure (as in Oregon), rather than involving the
8 offices of district attorneys or the Attorney General. In addition, requiring operators to
9 provide stand-by service to excavators during excavations around high pressure pipe is a
10 damage prevention practice that is very effective.

11 **8. Report Cathodic Protection (CP) deficiencies and provide a timetable for**
12 **remedial actions**

13 Many deficiencies that cause a CP system to be down can be resolved in six
14 months or less. However, replacement or reconditioning of pipe, or replacement or
15 addition of an anode ground bed will often take more than six months to address right-of-
16 way or environmental requirements if one or both of these are needed to restore a CP
17 system to required levels. Accordingly, it is important that appropriate timeframes are
18 established for such remedial actions to be completed, but specific exceptions should also
19 be allowed to be addressed through action plans. As with other documentation, the action
20 plans would be available for inspectors to review. Southwest Gas encourages the
21 Commission to consider these issues when it prepares draft rules.

22 **9. Cover requirements for transmission lines**

23 Southwest Gas encourages the Commission to consider the continuing surveillance
24 and patrolling requirements of 49 CFR Part 192, and the integrity management program
25 requirements under 49 CFR Part 192 Subpart O, where cover is considered in relative risk
26 assessments processes when drafting the rules. In addition, as noted above, an effective
27 damage prevention program should provide for operator standby surveillance of
28 excavations around high-pressure pipeline facilities.

1 **10. Reporting problems associated with mechanical/compression fittings**

2 Southwest Gas encourages the Commission to consider the fact that the Advisory
3 Bulletin (ADB-08-02) referred to in the rationale has effectively been superseded by the
4 Distribution Integrity Management Program (DIMP) rule (49 CFR Part P) and the new
5 reporting requirements. As a result, PHMSA now requires all mechanical fitting failures that
6 result in hazardous leaks to be reported annually (see Form PHMSA F7100.1-2
7 Mechanical Fitting Failures and associated instructions). Furthermore, 49 CFR §192.617
8 requires Investigation of Failures for the purpose of determining causes of the failure and
9 minimizing the possibility or recurrence.

10 **11. Assessment of existing Meter Set Assemblies (MSA) and other pipeline**
11 **components to protect them from excessive snow and ice loading**

12 Southwest Gas generally supports this effort, as its current practice follows a similar
13 requirement. However, Southwest Gas encourages the Commission to consider the
14 potential issues pertaining to ownership of the protective barrier and future maintenance of
15 the protective barriers on private property, which Southwest Gas believes should continue
16 to be the customer's ownership and responsibility.

17 **12. Require operators to identify threats along their pipelines and come up with a**
18 **plan to mitigate the threats, including research and development (192.919)**

19 Southwest Gas encourages the Commission to consider the requirements and
20 conditions of 49 CFR Subpart O (Gas Transmission Pipeline Integrity Management) prior
21 to proposing a new rule on this topic. The Commission has already adopted the federal
22 regulations and should make sure there is no conflict with existing requirements, meanings
23 or definitions.



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