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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)

**REPLY COMMENTS OF  
SOUTHWEST GAS CORPORATION  
(U 905 G)  
TO THE COMMISSION'S  
PROPOSED DECISION DETERMINE MAXIMUM ALLOWABLE OPERATING  
PRESSURE METHODOLOGY AND REQUIRING FILING OF NATURAL GAS  
TRANSMISSION PIPELINE REPLACEMENT OR TESTING IMPLEMENTATION PLANS**

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

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

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

8 **REPLY COMMENTS**  
9 **OF**  
10 **SOUTHWEST GAS CORPORATION (U 905 G)**  
11 **ON THE PROPOSED DECISION**

12 Southwest Gas Corporation hereby submits the following reply comments to the  
13 Proposed Decision of the California Public Utilities Commission ("Commission").

14 Southwest Gas is a natural gas local distribution company that serves over 182,000  
15 customers in California. The Company owns and operates approximately 15 miles of  
16 intrastate transmission pipelines, 3,114 miles of distribution mains and 2,452 miles of  
17 services in California. Southwest Gas has completed a thorough review of MAOP records  
18 for the 15 miles of intrastate transmission pipelines, as indicated in our response dated  
19 January 21, 2011, to the Commission's request regarding the implementation of the NTSB's  
20 Recommendation P-10-7. Based upon that review, Southwest Gas estimates that  
21 approximately seven miles of transmission pipelines would be subject to the Proposed  
22 Decision's requirement for a Natural Gas Transmission Pipeline Comprehensive Pressure  
23 Testing Plan ("Implementation Plan").

24 Southwest Gas fully supports the Commission's interest in maintaining and carefully  
25 monitoring the pipeline infrastructure to ensure safe and reliable delivery. Southwest Gas  
26 also supports smart modernization, new technologies and sharing information among  
27 operators, emergency responders, the public and the Commission to enhance pipeline  
28 safety. Southwest Gas offers the following in response to the comments that were filed in  
response to the Proposed Decision.

1 **Prioritization and Track Process**

2 Southwest Gas supports the proposal to prioritize the initiatives identified in the  
3 January 24, 2011 OIR. Specifically, Southwest Gas supports the proposed schedule  
4 discussing at the June 2, 2011 Pre-Hearing Conference to establish separate tracks in this  
5 proceeding – beginning with the development of implementation plans solely responsive to  
6 the National Transportation Safety Board (“NTSB”) safety recommendations. Southwest  
7 Gas is also supportive of conducting a separate prehearing conference for Track 2  
8 following the release of the final NTSB report.

9 **Alternatives to Pressure Testing**

10 Southwest Gas supports the proposal to allow utilities to include in their  
11 Implementation Plans requests for authorization to utilize other alternatives to pressure  
12 testing. Southwest Gas understands that such alternatives will be explored and discussed  
13 in further detail during the technical workshops tentatively scheduled for June 22-23, 2011.  
14 The use of alternative inspection technologies, if feasible, may provide an equal or greater  
15 level of integrity assessment as compared to pressure testing for certain threats. In  
16 addition, the use of such tools may be more economical for the benefit of natural gas  
17 customers.

18 **Ratemaking Consideration**

19 Southwest Gas appreciates the Commission’s recognition and interest in pursuing  
20 both interim changes, by permitting utilities to include rate proposals in their respective  
21 Implementation Plans, and the pursuit of broader policy changes in this OIR to align  
22 ratemaking policies, practices, and incentives to better reflect safety concerns and ensure  
23 ongoing commitments to public safety.

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**III.  
CONCLUSION**

Southwest Gas appreciates the opportunity to provide reply comments and continues to look forward to actively working with the Commission and the other utilities in addressing the issues posed in this proceeding.

Dated this 6<sup>th</sup> day of June, 2011, at Las Vegas, Nevada.

SOUTHWEST GAS CORPORATION

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