



## **SOUTHWEST GAS CORPORATION**

James F. Wunderlin, P.E., Senior Vice President/Engineering & Business Operations and  
Technology Support

September 16, 2009

Ms. Ginger Lemay  
Office of Information Technology, TSA-11  
Transportation Security Administration  
601 South 12<sup>th</sup> Street  
Arlington, VA 20598-6011

**SUBJECT: Southwest Gas Corporation's Comments on the Transportation Security  
Administration Intent to Request Approval From OMB of One New Public  
Collection of Information: Pipeline Operator Security Information**

Dear Ms. Lemay:

Southwest Gas Corporation (Southwest) herein submits its comments on the Transportation Security Administration's (TSA) Intent to Request Approval from OMB of One New Public Collection of Information: Pipeline Operator Security Information.

Southwest is a natural gas local distribution company that serves over 1.8 million customers in Arizona, California and Nevada. Southwest owns and operates 1,007 miles of interstate and intrastate transmission pipelines and 29,663 miles of distribution mains. In addition, Southwest owns a subsidiary, Paiute Pipeline Company (Paiute), which operates an interstate pipeline and a liquefied natural gas (LNG) facility in Nevada. Southwest is also an active member of the American Gas Association (AGA).

### **Southwest General Comments**

In general, Southwest appreciates and supports the goal of TSA to establish a basis for the voluntary submission of pipeline operator security manager contact information to TSA's Pipeline Security Division and the reporting of security incident data to the Transportation Security Operation Center (TSOC).

Southwest herein submits a few additional specific comments for TSA's consideration:

- Southwest believes that the submission of pipeline security incident data to TSOC should remain voluntary as indicated in the Federal Register notice. Southwest, like most other operators, is already under many Federal and State reporting requirements by numerous agencies including the Department of Transportation and state public utility commissions. If TSA were to ever consider making these reporting requirements mandatory, Southwest recommends that TSA first consider using data already submitted under existing Federal and State reporting requirements.

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- Southwest, like other operators, has worked hard to develop working relationships and reporting initiatives with Anti/Counterterrorism Fusion Centers (i.e. Silver Shield), police, fire, FBI/JTTF, and local emergency planning committees, etc. and strongly suggests that TSA consider integrating itself into these existing interagency initiatives. Considering that the Anti/Counterterrorism Fusion Centers have been charged with maximizing intelligence exchange and integrating local, regional, state and federal criminal trends for crimes of all types, it may be possible for TSA to glean the requested data from these centers in lieu of collecting the information separately.
- Operators like Southwest are getting overwhelmed with responding to multiple requests for reporting pipeline safety/security events to agencies such as the police, FBI/JTTF, fire, state emergency agencies, state homeland security agencies, local emergency planning committees, FERC, and Anti/Counterterrorism Fusion Centers. Consequently, Southwest recommends for the sake of efficiency, that the existing National Response Center (NRC) reporting system be considered as a possible solution as a means to collectively capture initial reporting information.

If you have any questions, please feel free to contact me by telephone at (702) 876-7112 or by email at [james.wunderlin@swgas.com](mailto:james.wunderlin@swgas.com).

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "J.F. Wunderlin".