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PUBLIC UTILITIES COMMISSION

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SENT VIA E-MAIL

August 11, 2025

Ms. Jennifer L. Homendy
National Transportation Safety Board
Chairman
490 L'Enfant Plaza, SW,
Washington, DC 20594
Email Response to - ExecutiveSecretariat@ntsb.gov

Re: April 8, 2025, Letter Regarding UGI Corporation Natural Gas-Fueled Explosion and Fire, West Reading, Pennsylvania, March 24, 2023, NTSB/PIR-25/01 and Safety Recommendation P-25-5

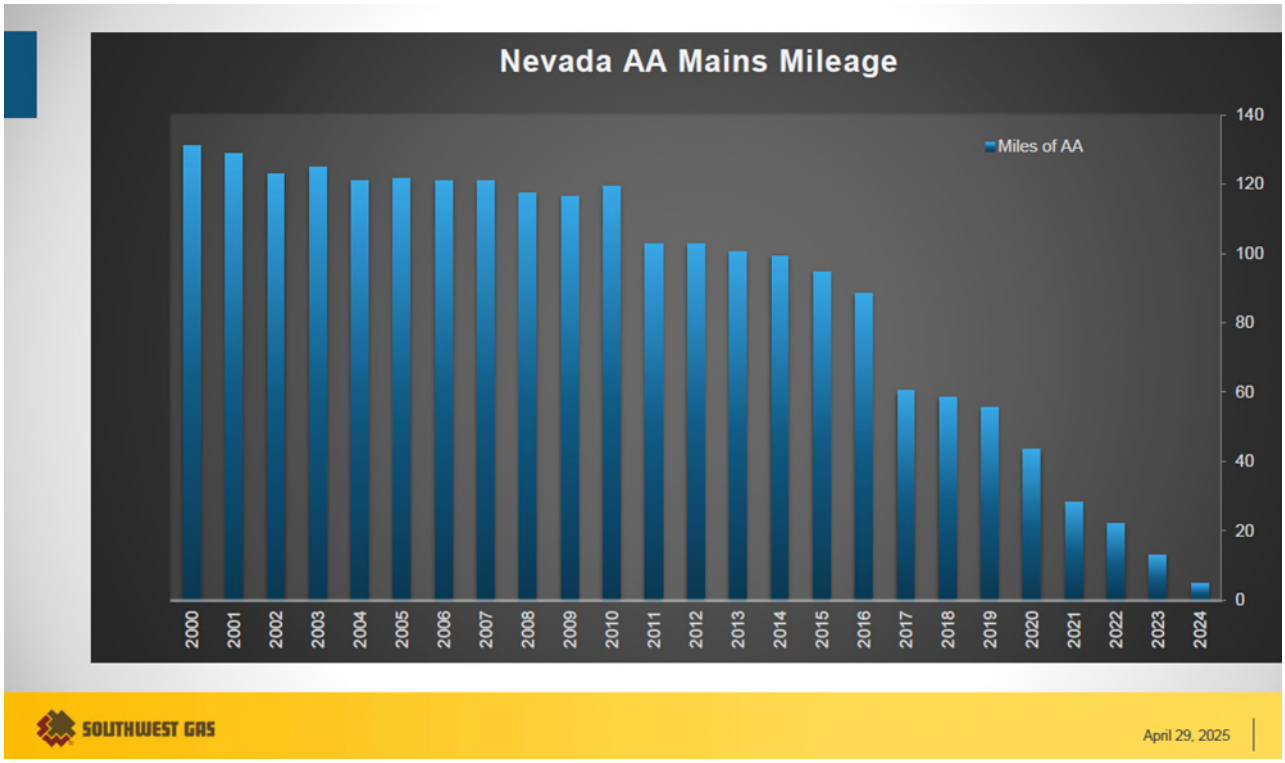
Dear Ms. Homendy:

On April 8, 2025, a letter was sent to Governor Lombardo, regarding information and recommendations arising from the National Transportation Safety Board's (NTSB) investigation into the UGI Natural Gas Explosion Incident that occurred on March 24, 2023, in West Reading, PA. Governor Lombardo has since forwarded this letter to the Nevada Public Utilities Commission ("PUCN") for a response.

Pipeline safety remains a top priority for Nevada. The State has long recognized the risks associated with Aldyl A natural gas pipelines. In 2011, the PUCN approved an accelerated pipeline replacement program authorizing Nevada's largest natural gas distribution operator, Southwest Gas Corporation, to begin replacing all early-vintage plastic pipes, including all Aldyl A pipe mains and services.

As the graph below illustrates, in 2010, Southwest Gas operated more than 120 miles of Aldyl A pipe mains in Nevada. By the end of 2024, that number had been reduced to fewer than five miles. All remaining Aldyl A pipelines are scheduled for replacement by the end of 2025,[1] at which point there will be no known Aldyl A pipe remaining in active operation within Nevada's natural gas distribution system.

[1] The same applies for Aldyl A pipeline services; these service lines will also be fully replaced by the end of 2025.



In addition to the accelerated pipeline replacement work, in 2021, Nevada became the first state in the nation to adopt an annual natural gas leak detection and survey regulation, significantly advancing pipeline safety. Adopted by the PUCN in Docket No. 19-09011, this regulation mandates that every 49 CFR 192 jurisdictional intrastate natural gas and propane pipeline operating in Nevada be leak-surveyed every year. This requirement applies regardless of pipe type, vintage or age, size, or location. Importantly, the regulation requires the use of an electronic detection instrument for these surveys. Visual inspections alone, such as identifying dead vegetation, are no longer permitted. This state requirement marks a major improvement over the current federal standard in 49 CFR 192.723, which only requires a leak survey every five years.

By increasing the frequency and reliability of leak detection, Nevada's regulation helps to ensure that leaks are identified and addressed more quickly. This improves public safety and efficiency and reduces environmental risk. The benefits of this proactive approach have been presented at numerous regulatory forums. A presentation highlighting these advantages is available on the PUCN's website and can be viewed here: https://www.youtube.com/watch?v=SFMmKdDENYE.

The NTSB also recommended:

"Require the installation of natural gas alarms that meet the specifications of National Fire Protection Association 715 in businesses, residences, and other buildings where people congregate that could be affected by a natural gas leak."

In response, Nevada's key stakeholders, including PUCN Staff, Southwest Gas, and NV Energy (the state's other major utility) have initiated discussions regarding the feasibility of a pilot program. This program would involve installing natural gas detection alarms in select high-occupancy buildings and monitoring the performance of these devices. It is essential that the functionality, reliability, longevity, and public acceptance of the devices be evaluated, along with other key data points, before a statewide mandate for their installation in all new and existing homes and buildings will be considered.

The PUCN greatly values its relationship with the NTSB and sincerely appreciates the thoughtful safety recommendations outlined in your April 8, 2025, letter.

Sincerely,

Stephanie Mullen
Executive Director

Paul Maguire
Manager, Engineering Division

cc: Tim Robb, Director of Strategic Initiatives & Homeland Security Advisor, trobb@gov.nv.gov
Hayley Williamson, PUCN Chair, hwilliamson@puc.nv.gov
Brett D. Compston, Nevada's Emergency Manager/Homeland Security Chief, b.compston@dem.nv.gov
Anne-Marie Cuneo, PUCN Director of Regulatory Operations, amcuneo@puc.nv.gov
Neil Pascual, PUCN Regulatory Engineer & Pipeline Safety Program Manager, npascual@puc.nv.gov)