

**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)**

**CALIFORNIA SAFETY PLAN  
OF  
SOUTHWEST GAS CORPORATION  
(U 905 G)**

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6 **OF**  
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9 **Introduction and Brief Background**

10 1. Southwest Gas Corporation (Southwest Gas or Company) respectfully submits to  
11 the California Public Utilities Commission (Commission) its California Safety Plan (Plan) in  
12 compliance with the Decision Amending Scope of Rulemaking 11-02-019 and Adding  
Respondents, dated April 20, 2012 (D.12-04-010).

13 2. In February 2011, the Commission opened Rulemaking 11-02-019 to coordinate  
14 pipeline safety efforts, obtain public input, and propose any necessary rule and/or policy  
15 changes.<sup>1</sup>

16 3. In October 2011, the California Legislature passed Senate Bill (SB) 705, which  
17 was subsequently codified as Sections 961 and 963 of the California Public Utilities Code. The  
18 regulations require, among other things, that each gas corporation operating in California  
19 develop a plan for the "safe and reliable operation of its commission-regulated gas pipeline  
20 facilities. . .subject to approval, modification and adequate funding by the commission."<sup>2</sup> The

21  
22  
23  
24 <sup>1</sup> D12-04-010. at pg.8-9.

<sup>2</sup> Pub. Util. Code §961(b)(1).

1 Commission must review and accept, modify or reject each utility’s plan by December 31,  
2 2012.<sup>3</sup>

3 4. In D.12-04-010, the Commission addressed the requirements of Public Utilities  
4 Code §§961 and 963 by requiring all California gas system operators to file a safety plan no later  
5 than June 29, 2012. Through the safety plans, operators must demonstrate how they address  
6 each element of Public Utilities Code §§961 and 963.<sup>4</sup>

7 **Southwest Gas’ California Safety Plan**

8 5. Attached hereto and incorporated herein as Exhibit “A” is Southwest Gas’  
9 California Safety Plan.

10 6. In accordance with Public Utilities Code §961(e) and D.12-04-010, the Company  
11 distributed the Plan to applicable employees and contractors, and provided an opportunity for  
12 questions, comments and feedback. Attached hereto and incorporated herein as Exhibit “B” is a  
13 log reflecting the questions and comments received by the Company, along with information on  
14 the Company’s disposition of the questions and comments, and the Company’s rationale for such  
15 disposition.

16 **Summary and Conclusion**

17 7. Based upon the foregoing, and in response to D.12-04-010, Southwest Gas  
18 respectfully requests that the Commission approve its Plan on or before December 31, 2012.

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23 <sup>3</sup> Id. at §961(b)(2).

24 <sup>4</sup> D12-04-010. at p.17.



# **Exhibit A**



# CALIFORNIA SAFETY PLAN

Prepared By:  
Approved By:  
Issue Date:  
Effective Date:  
Superseded Date:

Gas Operations Support Staff  
Jerry Schmitz  
06/29/12  
07/29/12  
Original

## California Safety Plan

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# CALIFORNIA SAFETY PLAN

Prepared By: Gas Operations Support Staff  
 Approved By: Jerry Schmitz  
 Issue Date: 06/29/12  
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## 1. PURPOSE AND SCOPE

### 1.1 OUR COMMITMENT TO SAFETY – “YOUR SAFETY, OUR PRIORITY”

1.1.1 Southwest Gas is dedicated to providing safe and reliable natural gas service. The safety of our workforce, customers and communities is the top priority of Southwest Gas. While we believe we have an excellent safety record, we continuously strive to improve our operations by evaluating industry best practices, and by considering the lessons learned from pipeline incidents across the country.

1.1.2 In order to protect people and property, our goal is to identify and resolve potential problems before they occur. The reliability of our pipeline systems is ensured through proper design, safe construction practices, comprehensive integrity management programs, improvement projects, and routine inspection and maintenance. All this is managed by maintaining a knowledgeable and qualified workforce through continuous education, training, and participation in industry activities.

1.1.3 We also strive to build, maintain and enhance our partnerships with public safety and emergency response agencies within the communities we serve. These partnerships help to ensure immediate and effective emergency response in the event of a natural gas related incident.

1.1.4 Southwest Gas participates in various regional and national organizations focused on improving pipeline safety such as the American Gas Association (AGA), Plastic Pipe Database Committee (PPDC), Gas Piping Technology Committee (GPTC), Common Ground Alliance (CGA) and the Western Energy Institute (WEI). A complete list of organizations is provided in Appendix A.

1.1.5 We have developed this Safety Plan to help communicate how our various policies, procedures, standards, and manuals support our commitment to safety. The continued commitment to safety depends not only on knowledge, skills and work performance, but on the identification of potential issues and the swift and specific reaction to any emergency situation that may arise.

### 1.2 REGULATION REQUIREMENTS

1.2.1 Southwest Gas Corporation (Company) will utilize this California Safety Plan (Plan) to comply with the California Public Utility Commission (CPUC) requirements set forth in R.11-02-019 and the mandates of Senate Bill (SB) 705 as codified in the California Public Utilities Code Sections 961 and 963:

Plan	California Safety – Purpose and Scope	Sec-Pg 1-1
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- 1.2.1.1 The Company shall implement and utilize its Plan upon CPUC approval. The Plan will clearly document and define Company policies and procedures related to:
- **Safety Systems** *{CA Public Utilities Code § 961(d)(1)(2)}* are those policies and procedures that identify and minimize hazard and system risk.
  - **Emergency Response** *{CA Public Utilities Code § 961(d)(5)(6)(8)}* are those policies and procedures that limit the damage from accidents, provide for timely response to reports of leaks, hazardous conditions, and emergency events and prepare for and respond to earthquakes and other major events.
  - **State and Federal Pipeline Regulations** *{CA Public Utilities Code § 961(d)(7)(9),(c)}* establish a minimum baseline for pipeline safety in the United States. Each state either adopts these minimum standards or establishes a higher standard for those natural gas operators within their jurisdiction.
  - **Continuing Operations** *{CA Public Utilities Code § 961(b)(3),(d)(3)(4)(10)}* are those that ensure the safety of the public and Company employees, provide for adequate system storage and transportation capacity to safely and reliably deliver gas to all customers, provide for effective patrol and inspection to detect leaks, and to ensure an adequately sized, qualified and properly trained Company workforce.
  - **Emerging Industry Issues** *{CA Public Utilities Code § 961 (d)(11)}* are any additional matters that the CPUC or Company determines should be included in this Plan.
- 1.2.1.2 The Company shall periodically review and update the Plan.
- 1.2.1.3 The Plan shall be consistent with federal pipeline safety statutes as set forth in Chapter 601 of Subtitle VIII of Title 49 of the United States Code and the regulations adopted by the United States Department of Transportation pursuant to those statutes and best practices in the natural gas industry.
- 1.2.1.4 The Plan shall set forth how the Company will implement the Plan.
- 1.2.1.5 The Company shall provide opportunities for meaningful, substantial, and ongoing participation by the Company workforce in the development and implementation of the Plan, with the objective of developing an industry wide culture of safety to minimize the likelihood of accidents, explosions, fires, and dangerous conditions for the protection of the public and the Company’s workforce.





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## 1.3 OBJECTIVES

1.3.1 The Company will convey its pipeline safety performance expectations, policy principles, and goals/objectives through the following actions:

- 1.3.1.1 Protect people and property by identifying and minimizing hazards and systemic risks in order to minimize the likelihood of accidents, explosions, fires, and dangerous conditions.  
*{CA Public Utilities Code § 961(d)(1)}*
- 1.3.1.2 Identify and implement improvements to pipeline safety systems that may be deployed to minimize hazards, including adequate documentation of gas pipeline facility history and capability.  
*{CA Public Utilities Code § 961(d)(2)}*
- 1.3.1.3 Provide adequate transportation capacity to reliably and safely deliver gas to all customers consistent with rules authorized by the CPUC governing core and noncore reliability and curtailment, including provisions for expansion, replacement, preventative maintenance, and reactive maintenance and repair of gas piping facilities.  
*{CA Public Utilities Code § 961(d)(3)}*
- 1.3.1.4 Perform effective patrols and inspections of gas pipeline facilities to detect leaks and other compromised facility conditions and make timely repairs.  
*{CA Public Utilities Code § 961(d)(4)}*
- 1.3.1.5 Provide appropriate and effective system controls, with respect to both equipment and personnel procedures, to limit the likelihood of damage from accidents, explosions, fires, and dangerous conditions.  
*{CA Public Utilities Code § 961(d)(5)}*
- 1.3.1.6 Provide timely response to customer and employee reports of leaks or abnormal operating conditions and emergency events.  
*{CA Public Utilities Code § 961(d)(6)}*
- 1.3.1.7 Include appropriate protocols for determining maximum allowable operating pressures for transmission pipeline segments.  
*{CA Public Utilities Code § 961(d)(7)}*
- 1.3.1.8 Prepare for and respond to earthquakes and other major events to minimize damage.  
*{CA Public Utilities Code § 961(d)(8)}*



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1.3.1.9 Meet or exceed the minimum standards for safe design, construction, installation, operation, and maintenance of gas transmission and distribution facilities prescribed by regulations issued by the United States Department of Transportation in Part 192 (commencing with Section 192.1) of Title 49 of the Code of Federal Regulations.

*{CA Public Utilities Code § 961(d)(9)}*

Ensure an adequately sized, qualified, and properly trained gas corporation workforce to carry out the Plan. *{CA Public Utilities Code § 961(d)(10)}*

1.3.1.10 Any additional matter that the CPUC determines should be included in the Plan. *{CA Public Utilities Code § 961(d)(11)}*

## 1.4 APPLICABILITY, IMPLEMENTATION AND REVISION

1.4.1 This Plan applies to all Company and contractor personnel who perform emergency response activities in the Company’s California service territories. This includes, but is not limited to field employees, field supervision and management, dispatch, gas controllers, and contractors.

1.4.2 This Plan will be effective upon CPUC approval. Implementation of the Plan is through application of reference documents which address all of the elements set forth in the regulation. Initial implementation will occur through specific overview training with all affected personnel identified in the Plan. Training will be documented in accordance with Company guidelines. Annual review of the Plan will occur with the affected personnel through Block Training. Training for new hires will occur during the orientation training as the existing referenced Company policies, procedures, programs and plans are reviewed.

1.4.3 The Plan references other existing Company policies, procedures, programs and plans. These referenced documents are reviewed annually and updated as needed. The Plan will be reviewed annually in conjunction with these referenced documents. In addition, the Plan will be revised based upon changes to regulatory requirements, policies or procedural changes, editorial changes or as determined by the Company.



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## 2. PLAN PROVISIONS

This Plan embodies the policies and procedures specified in the Company’s manuals, plans and programs listed below as well as the Natural Gas Transmission Pipeline Comprehensive Pressure Testing Implementation Plan (Implementation Plan).

Manual/Program/Plan	CA Public Utilities Code	R.11-02-019 Topic
Operations Manual (OPM)	CA Public Utilities Code § 961(d)(1)-(9), § 963(b)(3)	Safety Systems Emergency Response State and Federal Regulations Continuing Operations
Distribution Integrity Management Program (DIMP)	CA Public Utilities Code § 961(d)(1)(2)(9), § 963(b)(3)	Safety Systems State and Federal Regulations Continuing Operations
Transmission Integrity Management Program (TRIMP)	CA Public Utilities Code § 961(d)(1)(2)(9), § 963(b)(3)	Safety Systems State and Federal Regulations Continuing Operations
Damage Prevention Program (DPP)	CA Public Utilities Code § 961(c), (d)(1)(2)(9)	Safety Systems State and Federal Regulations
Public Awareness Program (PA)	CA Public Utilities Code § 961(d)(1)(2)(5)(9)	Safety Systems Emergency Response State and Federal Regulations
Emergency Plan Manual (EPM)	CA Public Utilities Code § 961(d)(2)(5)(6)(8)(9)	Safety Systems Emergency Response State and Federal Regulations
Control Room Management Plan (CRMP)	CA Public Utilities Code § 961(d)(1)(2)(5)	Safety Systems Emergency Response
Operator Qualification Plan (OQ)	CA Public Utilities Code § 961(c),(d)(10)	State and Federal Regulations Continuing Operations
Safety Manual	CA Public Utilities Code § 961(d)(1)(2)(5)(10)	Safety Systems Emergency Response Continuing Operations
Customer Service Manual (CSM)	CA Public Utilities Code § 961(d)(1)(2)(4)(5)(6)(9), § 963(b)(3)	Safety Systems Emergency Response State and Federal Regulations Continuing Operations
Material Specifications	CA Public Utilities Code § 961(d)(1)(2)(9)	Safety Systems State and Federal Regulations
Environmental Manual	CA Public Utilities Code § 961(d)(1)(2)(9)(10), § 963(b)(3)	Emergency Response State and Federal Regulations Continuing Operations
Dispatch Manual	CA Public Utilities Code § 961(d)(1)(2)(5)(6)(8)(9), § 963(b)(3)	Safety Systems Emergency Response State and Federal Regulations
Drug and Alcohol Plan (D&A)	CA Public Utilities Code § 961(c),(d)(10)	State and Federal Regulations Continuing Operations

Note: The manuals/programs/plans listed above may be accessed from the SWG Manuals folder on the desktop, the Online Manuals link on the SWG InfoNet, the SWGCommon (L:) drive and the SFTP website (Filezilla).



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## 2.1 OPERATIONS MANUAL

2.1.1 The Operations Manual contains policies and procedures for the operations and maintenance plan of the Company’s natural gas facilities. This manual meets or exceeds the requirements set forth in U.S. Department of Transportation regulation *Title 49 CFR Part 192*. The Company operates in Arizona, California and Nevada. The policies and procedures included in the Operations Manual also meet or exceed the requirements for pipeline safety in each state.

2.1.2 The Operations Manual provides policies and procedures for leak survey, leak detection, patrolling requirements, emergency response requirements, identification of abnormal and unusual operating conditions, corrosion control requirements, measurement and control requirements, design standards, mapping standards and general operational standards for transmission and distribution facilities.

### 2.1.3 Distribution Integrity Management Program

- The Company’s Distribution Integrity Management Program (DIMP) is a risk-based process to gather and evaluate information about distribution pipelines and to prioritize and implement actions based on that information to ensure the safety and integrity of distribution facilities.
- The Company has utilized some form of distribution integrity since the mid-1980’s prior to the federally mandated requirement set forth in U.S. Department of Transportation regulation *Title 49 CFR Part 192, Subpart P – Gas Distribution Pipeline Integrity Management*. DIMP is managed by a centralized group within the Company, applies to all Company distribution facilities, and includes Subject Matter Experts (SME) from the various operating workgroups. Regular updates are provided to Executive Management on the status and progress of this program. DIMP is incorporated into the Company’s Operations Manual.

### 2.1.4 Transmission Integrity Management Program

- The Company developed its Transmission Integrity Management Program (TRIMP) to comply with the requirements of the U.S. Department of Transportation regulation *Title 49 CFR Part 192, Subpart O – Gas Transmission Pipeline Integrity Management*. TRIMP is designed to ensure the integrity of gas transmission pipelines located where a leak or rupture could do the most harm. TRIMP addresses pipelines that could affect high consequence areas (HCAs).



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- TRIMP is managed by a centralized group within the Company and incorporates Subject Matter Experts (SME) from the various operating workgroups. Regular updates are provided to Executive Management on the status and progress of this program. All Company transmission facilities fall within the scope of TRIMP. TRIMP is incorporated into the Company’s Operations Manual.

## 2.1.5 Damage Prevention Program

- The Company’s Damage Prevention Program (DPP) utilizes a proactive, comprehensive and progressive approach to comply with all state and federal laws and regulations, federal and state formal and informal goals and initiatives related to damage prevention. The Company is active in industry organizations, One-Call centers, stakeholder groups and public forums to work collaboratively with the public, excavators, emergency responders and regulatory agencies to optimize opportunities for the success of the DPP.
- The Company is committed to designing, constructing, operating, and maintaining its pipelines in a manner that ensures long-term safety and product reliability to the public, its customers, contractors, and employees. This includes minimizing service interruptions and negative impacts caused by excavation damage. To this end the Company has committed and will continue to commit, the necessary resources to maintain and enhance its DPP. DPP is incorporated into the Company’s Operations Manual.

## 2.1.6 Public Awareness Program

- The Company developed a Public Awareness Program (PA) to comply with the American Petroleum Institute (API) recommended practice RP1162. The purpose of the PA is to raise the community’s awareness of pipelines and pipeline safety. The PA applies to the natural gas distribution and transmission pipelines and facilities owned and operated by the Company. The PA also includes requirements from U.S. Department of Transportation regulation *Title 49 CFR Parts 192.605, 192.614, 192.615, and 192.616* to enhance messages, methods, procedures, and documentation. PAs are conducted in all service areas of the Company and are conducted, as necessary, in other languages commonly understood by a significant number and concentration of the non-English speaking population in the service territory. The PA is incorporated into the Company’s Operations Manual.



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## 2.2 EMERGENCY PLAN MANUAL

2.2.1 When any emergency arises that affects the normal, safe distribution of gas to customers, it is essential that a predetermined course of action and the means necessary to accomplish these actions be immediately taken to protect employees, contractors, the public, public property, and Company facilities. The Company's Emergency Plan Manual (EPM) describes the procedures and policies for accomplishing these objectives. All personnel are trained, drilled, and critiqued on emergency preparedness in order to maintain effective and timely responses to natural gas related emergencies. The EPM is considered part of the Company's Operations Manual.

## 2.3 CONTROL ROOM MANAGEMENT PLAN

2.3.1 The Company developed its Control Room Management Plan (CRMP) to address all documented Pipeline and Hazardous Materials Safety Administration (PHMSA) requirements as stated in the Pipeline Safety: Control Room/Human Factors, U.S. Department of Transportation regulation *Title 49 CFR Parts 192 and 195*. The Company has implemented a portion of CRMP through policies and procedures and will implement the remainder of the policies and procedures by August, 1, 2012 in accordance with PHMSA's control room management rule.

2.3.2 The Company's control room management policies and procedures are contained in the Company's Operations Manual in the Gas Control Department Policy and Procedure section. The Gas Control Department Policy and Procedure sections provide the processes to ensure that Company gas controllers are adequately trained and will provide effective responses during normal, unusual and abnormal operating conditions. The Company will ensure that all Gas Controllers maintain up-to-date knowledge of these processes and procedures. The CRMP applies to any Gas Controller who works in a control room monitoring and controlling all or part of a pipeline system via a Supervisory Control and Data Acquisition (SCADA) system.



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## 2.4 OPERATOR QUALIFICATION PLAN

2.4.1 The Operator Qualification (OQ) plan was developed and implemented to comply with U.S. Department of Transportation regulation *Title 49 CFR Part 192, Subpart N – Qualification of Pipeline Personnel*. The Company’s OQ plan defines covered tasks and the required qualifications for all work that meets the four-part test: (1) The activity is performed on a pipeline facility, (2) The activity is an operations or maintenance task, (3) The activity is performed as a requirement of *Title 49 CFR Part 192*, and (4) The activity affects the operation or integrity of the pipeline. The Company administers the OQ plan for all approved contractors and Company employees that perform work for the Company on its pipeline facilities. The OQ plan is incorporated by reference in the Company’s Operations Manual.

## 2.5 SAFETY MANUAL & ACCIDENT PREVENTION PROGRAM

2.5.1 The Company maintains a comprehensive employee safety program that Company employees are trained in and are encouraged to support. As part of the program, the Company has developed the Safety Policies and Procedures contained in the Safety Manual, and has also developed a written Accident Prevention Program. These publications outline the safety responsibilities of all employees, including general safety rules and specific safety requirements. All employees are encouraged to read them carefully, become familiar with them and strictly adhere to all safety rules and procedures that apply to their job. Work standards and procedures have been established with each employee’s safety in mind. In addition, the Company provides each employee with the proper tools and equipment to do their job safely, as well as personal protective equipment to use without hesitation. The employee safety program meets or exceeds the requirements for occupational safety regulatory compliance in each state.

## 2.6 CUSTOMER SERVICE MANUAL

2.6.1 The Customer Service Manual (CSM) contains policies and procedures for the operations and maintenance plan of the Company’s natural gas above ground facilities and customer’s piping and appliances.

2.6.2 The CSM provides policies and procedures for turning on and off gas service to commercial and residential customers, appliance service, leak investigation, leak detection equipment, carbon monoxide investigation, emergency response requirements, identification of abnormal and unusual operating conditions, customer service, hot change device and usage, pressure testing, purging, meter set assembly, and appliance service bulletins. Components of the CSM are included throughout the Operations Manual and other referenced manuals.

Plan	California Safety – Plan Provisions	Sec-Pg 2-5
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## 2.7 MATERIAL SPECIFICATIONS

2.7.1 The Company’s Material Specifications denote the requirements that must be met for all natural gas carrying components utilized within the Company’s natural gas infrastructure. These specifications include the material; applicable standards (national, federal or other), terminology, materials and manufacturing standards, material performance requirements, dimensions and tolerances, inspection, certification, Material Safety Data Sheet (MSDS) information, product marking and labeling, packaging, stock classification descriptions, and approved manufacturers or product suppliers.

## 2.8 ENVIRONMENTAL MANUAL

2.8.1 The Environmental Manual contains policies and procedures to ensure the personal safety of employees, contractors, customers and communities from environmental hazards related to the operations and maintenance activities of the Company’s natural gas facilities. The manual meets or exceeds the requirements set forth by the U.S. Environmental Protection Agency in 40 CFR. The Company operates in Arizona, California and Nevada. The policies and procedures also meet or exceed the requirements for environmental compliance in each state.

## 2.9 DISPATCH MANUAL

2.9.1 The Dispatch Manual contains policies and procedures for the issuance, scheduling and logging of Company orders to field personnel. This manual includes radio transmission procedures, order execution and prioritization, exchange of information between the office and field, receiving emergency phone calls and responding personnel to emergency conditions. Components of the Dispatch Manual are included throughout the Operations Manual and other referenced manuals.

## 2.10 DRUG AND ALCOHOL PLAN

2.10.1 The Company's Anti-Drug and Alcohol Misuse Prevention (D&A) Plan provides policies, procedures, and protocols for drug and alcohol testing of individuals who perform Department of Transportation (DOT) safety-sensitive operations, maintenance, or emergency response functions on natural gas facilities. The Company's D&A Plan meets or exceeds the requirements set forth in U.S. DOT regulation *Title 49 CFR Parts 199 and 40*. The Company operates in Arizona, California and Nevada. The policies and procedures included in the D&A Plan also meet or exceed the requirements for DOT D&A testing in each state.

Plan	California Safety – Plan Provisions	Sec-Pg 2-6
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## 2.11 NATURAL GAS TRANSMISSION PIPELINE COMPREHENSIVE PRESSURE TESTING IMPLEMENTATION PLAN

2.11.1 The Company filed its Implementation Plan with the CPUC on August 26, 2011, in compliance with Decision (D.)11-06-017. The Implementation Plan is currently pending approval.



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## 3. SYSTEM CAPACITY AND RELIABILITY COMMITMENT

3.1.1 The Company owns and operates commission regulated distribution and transmission pipeline facilities to provide service to core and noncore customers. The Company does not own and/or operate storage facilities regulated by the Commission. The Company designs and operates the distribution and transmission pipeline facilities consistent with rules authorized by the CPUC governing core and noncore reliability and curtailment, including provisions for expansion, replacement, preventative maintenance, and reactive maintenance and repair of gas piping facilities.

Plan	California Safety – System Capacity and Reliability Commitment	Sec-Pg 3-1
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## 4. EMPLOYEE SAFETY AND WORK PROCESS

- 4.1.1 Any employee or contractor who perceives a breach of safety requirements is authorized to stop work immediately and communicate the breach to their management. Additionally, employees are required to report immediately any regulatory violations, suspected regulatory violations, or potentially harmful or dangerous conditions to a supervisor, the General Counsel, the Company’s Human Resources Department or the Southwest Gas Ethics Line (866-230-3579). The Company prohibits retaliation or retribution against any employee who in good faith submits a report under this policy. If requested by the employee, the identity of the employee will be kept confidential. Employees and contractors can submit safety concerns or concerns regarding this Plan to their management or through the Company’s Human Resources Department.
- 4.1.2 Employees and contractors can also contact the California Public Utilities Commission’s Consumer Safety and Protection Division to report suspected breaches of safety requirements. Reports to the California Public Utilities Commission’s Consumer Safety and Protection Division should be addressed to the Director of the California Public Utilities Commission’s Consumer Safety and Protection Division, 505 Van Ness Avenue, San Francisco, CA 94102.
- 4.1.3 If requested by the employee or contractor, the Director of the California Public Utilities Commission’s Consumer Safety and Protection Division will keep the identity of the employee/contractor confidential. If the employee or contractor desires that their identity remain confidential, contacts made to the Director of the California Public Utilities Commission’s Consumer Safety and Protection Division must be designated “Safety Breach Notification from Gas System Operator Employee – Confidentiality Requested.”



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## 5. PLAN REVIEW REQUIREMENTS

5.1.1 This Plan will be available to all affected personnel through the existing electronic manual distribution. Personnel are encouraged to actively evaluate the effectiveness and provide feedback, where applicable, on all sections of the Plan as well as through regular manual, policy and procedure review processes.



# CALIFORNIA SAFETY PLAN

Prepared By:  
Approved By:  
Issue Date:  
Effective Date:  
Superseded Date:

Gas Operations Support Staff  
Jerry Schmitz  
06/29/12  
07/29/12  
Original

## 6. APPENDIX A – NATURAL GAS INDUSTRY PARTICIPATION

- The American Gas Association (AGA)
  - Best Practices committee
  - Corrosion Control committee
  - Distribution Construction & Maintenance committee (DC&M)
  - Distribution and Transmission Engineering committee (DTE)
  - Distribution Integrity Management Steering Group
  - Environmental Matters committee
  - Environmental Regulatory Action committee (ERAC)
  - Executive committee
  - Operations Safety Regulatory Action committee (OSRAC)
  - Operations Section Managing committee
  - Pipeline Integrity Task Group
  - Plastic Materials committee
  - Safety and Occupational Health committee
  - Security committee
  - SOS Program
  - Utility and Customer Field Services committee (U&CFS)
- American National Standards Institute (ANSI) Z380.1 Gas Piping and Technology Committee (GPTC)
- The American Petroleum Institute (API) 5L & API 1104 technical committees
- American Society for Quality
- American Welding Society
- The Arizona Utility Group (AUG)
- Arizona Blue Stake
- Arizona Common Ground Alliance Partnership
- The American Society of Mechanical Engineers (ASME) B31Q technical committee
- The American Society of Mechanical Engineers (ASME) B31.8 technical committee



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Two handwritten signatures in black ink, one appearing to be "JS" and the other a circular mark.

- The American Society of Mechanical Engineers (AMSE) B31 standards committee
- California Regional Common Ground Alliance (CRCGA)
  - Legislative and Regulatory Committee
- California Utilities Emergency Association (CUEA)
- Common Ground Alliance (CGA)
- Dig Alert (Southern California One Call)
- The Gas Technology Institute (GTI)
- Inter-Utility Coordination Committee (IUCC)
- Inter-Utility Working Group (IUWG)
- National Association of Corrosion Engineers (NACE)
- Nevada Regional Common Ground Alliance (NRCGA)
- NYSEARCH - Natural Gas RD&D
- Operations Technology Development (OTD)
- The Plastic Pipe Database Committee (PPDC)
- USA North (Northern California and Nevada One Call)
- The Western Energy Institute (WEI)

# **Exhibit B**

# CALIFORNIA SAFETY PLAN COMMENTS & SUGGESTIONS

SECTION	COMMENT/SUGGESTION	DISPOSITION
1.4	<p>Are other Divisions of Southwest Gas required to review this plan?</p>	<p>No Plan changes required. As set forth in Section 1.4, this Plan applies to all Company and contractor personnel that perform emergency response activities in the Company’s California service territories. This response was communicated to the inquiring employee/department.</p>
1.4	<p>Are other utilities required to have this plan?</p>	<p>No Plan changes required. This Plan is required per California Public Utilities Code for all natural gas corporations within the State of California that fall under jurisdiction of the California Public Utilities Commission (CPUC). This response was communicated to the inquiring employee/department.</p>
2.2	<p>Does this plan allow the CPUC to see our employee’s personal addresses within our Emergency Plan?</p>	<p>No Plan changes required. Section 11.1.4 of the Emergency Plan Manual requires “Each Division / District or Gas Operations / Paiute Pipeline must maintain a current list of personnel available to respond to emergency situations in Appendix “A” of this plan.” However, the section of the Plan that contains employee’s personal information is maintained by the division or district and is not incorporated into the published Company Emergency Plan Manual. This response was communicated to the inquiring</p>



employee/departement.

1.2 So basically this plan covers what has already been implemented here at Southwest Gas? No Plan changes required. As set forth in Section 1.1, the purpose of the Plan is to communicate how the Company's various policies, procedures, standards, and manuals support its commitment to safety. This response was communicated to the inquiring employee/departement.

General Why are we doing this, we have complied with this for the last 40 years? No Plan changes required. As set forth in Section 1.2, the Plan was created in compliance with California Public Utilities Commission (CPUC) requirements set forth in R.11-02-019 and California Public Utilities Code Sections 961 and 963. This response was communicated to the inquiring employee/departement.

1.3.1.9/CA What is an "adequate" size?

Pub. Util. Code No Plan changes required. The term "adequate" is not defined specifically in the regulation. Southwest Gas interprets this term to mean a workforce that is sufficient to satisfy the requirements of its policies and procedures and the needs of our customers.

§961(d)(11)

This response was communicated to the inquiring employee/departement.

2.3 What is "Control Room Management?"

No Plan changes required. As set forth in Section 2.3 of the Plan, Control Room Management is a plan developed to meet federal requirements for operators of the

Company's Supervisory Control and Data Acquisition (SCADA) system. The SCADA system has the capabilities to remotely monitor and control all or part of a pipeline system. This may include, but is not limited to remote pressure monitoring, system performance, and valve operation. The Company's SCADA system is controlled by the Gas Control department. This response was communicated to the inquiring employee/department.

3.1.1 Add in "/or" for clarification. This suggestion was added into the Plan.

1.2 Because we mention this we should also mention the California Regional Common Ground Alliance - Legislative and Regulatory Committee.