



SOUTHWEST GAS CORPORATION

Jerome T. Schmitz, P.E., Vice President/Engineering

July 21, 2016

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 West 4th Street, Suite 500
Los Angeles, CA 90013

Subject: General Order 112-E Inspection of Southwest Gas Corporation's Southern California Division, Northern Nevada Division, and Southern Nevada Division, Public Awareness Plan, August 11-13, 2015

Dear Mr. Bruno:

Southwest Gas Corporation (Southwest Gas or Company) respectfully submits the attached response to the SED Summary of Inspection Findings letter for the General Order 112-E inspection of Southwest Gas' Southern California Division, Northern Nevada Division, and Southern Nevada Division, Public Awareness Plan dated June 22, 2016.

We appreciate Staff's consideration of this matter and look forward to discussing any questions or concerns that you may have.

Sincerely,

cc: M. Wei (CPUC)
K. Tong (CPUC)
C. Mazzeo (SWG)
E. Trombley (SWG)
K. Lang (SWG)
L. Brown (SWG)
V. Ontiveroz (SWG)



SUMMARY OF INSPECTION FINDINGS

A. SED Recommendations

PHMSA Form 21, Section 4.03 – Measure Percentage of Stakeholders Reached

SED staff had a discussion with SWG staff concerning tracking of returned mails. SED noted that SWG does not track its mailings to affected public and emergency responders stakeholders to ensure that the targeted stakeholders received its mailings and used the associated data to determine percentage of its messaging reach. SED agrees that the affected public stakeholder group is too large to practically institute this practice. However, SED recommends that SWG implement a tracking mechanism for emergency responders and public official stakeholder groups so that SWG is able to demonstrate that it has complied with the required messaging and mailings.

Southwest Gas Response

Southwest Gas appreciates SED's recommendation, but would like to clarify that its mailings are tracked to determine the percentage delivered for each mailing as outlined in Section 8.3, Determining Percentage of Mailings Delivered of the Company's Public Awareness Plan. As noted by Staff, Southwest Gas does not track its mailings to ensure that the targeted stakeholder "received" its mailing. Rather, Southwest Gas considers its mailings (sent by *USPS Bulk Mail*) to have been "received" unless the mailing is returned. As such, Southwest Gas tracks and logs the quantity of the return mail for each audience group, which in turn is subtracted from the total mailings sent. The result is then used to determine the percentage of mailings delivered to the affected public, public officials, and emergency response stakeholders. Attached is a report for the 2015 Public Awareness mailings.



Percentage Mailed Workshop for 2015 Public Awareness Mailings

Company	Project	Month	Year	Original List Quantity	Didn't pass National Change of Address (NCOA) Certification	Returned mail	Pieces delivered	% mailed
SWG	Excavators	Oct.	2015	227,342	363	1	226,978	99.84%
SWG	Emergency Responders	Aug.	2015	2,406	5	0	2,401	99.79%
SWG	Public Officials	Sept.	2015	3,435	15	0	3,420	99.56%
SWG	SLIP	Feb.	2015	75,205	847	0	74,358	98.87%
SWG	Working Around Pipelines	Nov.	2015	226,845	0	0	226,845	100.00%