## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

April 3, 2017

Jerry Schmitz
Vice President Engineering

Southwest Gas Corporation P. O. Box 93510, LVA-581

Las Vegas, NV 89193-8510



GI-2016-10-SWG32-01B-02B

Subject: General Order (G.O.) 112<sup>1</sup> Operation and Maintenance Inspection of Southwest Gas Corporation's Southern California Division Gas Transmission and Distribution System for Valves, Pressure Regulation and Overpressure Protection Facilities

Dear Mr. Schmitz:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order (G.O.) 112<sup>1</sup> Operation and Maintenance Inspection of Southwest Gas Corporation's (SWG) Valves, Pressure Regulation and Overpressure Protection Facilities in the Southern California Division (Inspection Unit) on October 10-14, 2016. The inspection included a review of the Inspection Unit's Transmission and Distribution Valves, Pressure Regulation, Overpressure Protection, and welding records for calendar years 2013, 2014 and 2015 and field inspections of pipeline facilities in the Victorville, Barstow and Big Bear Lake districts. SED's staff also reviewed Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED's staff identified one probable violation of G.O. 112<sup>1</sup>, Reference Title 49 Code of Federal Regulations (CFR), Part 192 described in the attached "Summary of Inspection Findings".

Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by SWG to address the probable violation noted in the "Summary of Inspection Findings". If you have any questions, please contact Durga Shrestha, at (213) 576-5763.

Sincerely,

Kenneth Bruno

Program Manager

Gas Safety and Reliability Branch

Kuneth A. B.

Safety and Enforcement Division

CC: Durga Shrestha, SED/GSRB, Kan Wai Tong, SED/GSRB

Laurie Brown, SWG

<sup>1</sup> General Order 112-F was adopted by the Commission on June 25, 2015 via 15-06-044

## Summary of Inspection Findings 2016 SWG Victorville Division Gas Transmission & Distribution System Inspection October 10-14, 2016

## **SED Identified Probable Violation**

Title 49 CFR, Part 192, Section 192.605 Procedural manual for operations, maintenance, and emergencies.

§192.605(b) Procedural manual for operations, maintenance, and emergencies states in part:

- (b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
  - (3) Making construction records, maps, and operating history available to appropriate operating personnel."

On October 12, 2016, SED's staff noted that the Relief Valve Station ID 11DS10026421 on First Ave, Barstow, CA, did not have station layout drawing on-site. SWG's employee tried locating the station layout in his computer and but was unable to locate one. The employee called SWG's engineering department and, eventually, was able to obtain information on the control valve operating sequence. The unavailability of station layout drawing on-site may lead to incorrect identification and, ultimately, to an incorrect operation. SWG failed to make the station drawing available to operating personnel, therefore, SWG is in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, Section 192.605(b)(3).