

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 24, 2019

Jerry Schmitz
Vice President, Engineering
Southwest Gas Corporation
P.O. Box 98510, LVA-581
Las Vegas, NV 89193-8510

GI-2019-01-SWG-30-03-04

RE: SED Closure Letter for the General Order (G.O.) 112-F Inspection of Southwest Gas Company's Operation and Maintenance Procedures and Emergency Response Programs

Dear Mr. Schmitz:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Southwest Gas Company's (SWG) response letter dated April 18, 2019 regarding the findings identified in the G.O. 112-F inspection of SWG's Operation and Maintenance (O&M) Procedures and its Emergency Response Program (ER) (Inspection Unit) on January 28-31, 2019.

A summary of the inspection findings documented by the SED, SWG's response to the findings, and SED's evaluation of SWG's response for each finding is outlined in SED's summary of inspection findings.

This letter serves as the official closure of the 2019 G.O. 112-F inspection of the O&M and ER Programs and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program.

Thank you for your cooperation in this inspection. If you have any questions, please contact Michelle Wei at (213) 620-2780 or by e-mail at miw@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthewson Epuna".

Matthewson Epuna
Program & Project Supervisor
Gas Safety & Reliability Branch
Safety and Enforcement Division

CC: Laurie Brown, SWG
Kan Wai Tong, GSRB/SED
Claudia Almengor, GSRB/SED

Summary of Inspection Findings

Dates of Inspection: January 28-31, 2019

Operator: SOUTHWEST GAS CORP

Operator ID: 18536 (primary)

Inspection Systems: Operation and Maintenance Plans (updated since January 1, 2017) and Emergency Response Program

Assets (Unit IDs): GI-2019-01-SWG-30-03-04 (88373)

System Type: GD

Inspection Name: SWG OM&E

Lead Inspector: Michelle Wei

Operator Representative: Laurie Brown

Unsatisfactory Results

No Preliminary Findings.

Concerns

Procedures : Emergency (PRO.SUBLEMERGOPS)

1. Question Does the process include procedures for ensuring the availability
Text of personnel, equipment, tools, and materials as needed at the
scene of an emergency?

References 192.615(a) (192.615(a)(4))

Assets Covered GI-2019-01-SWG-30-03-04 (SWG OM&E)

Issue Summary While reviewing the Appendices for SWG's Emergency Plan, SED noted that the format and information contained in each differed from division to division. For example, Appendix B should contain a "list of tools, equipment, and materials available for response to emergencies" (Emergency Plan, Section 11.2.1). Each of the three divisions that operate in California included a parts list. However, Needles/Bullhead City also included a list of emergency equipment that is housed on each of their types of vehicles and Southern

California included a list of vehicles and their capabilities. Appendix C is to be a "list of vehicles, mobile and fixed communications equipment, available for emergencies" (Emergency Plan, Section 11.3.1). Some divisions listed only radio and communication information, while others also included a list of vehicles. SED recommends that SWG to standardize these forms company-wide, or at least state-wide, in order to ensure that each appendix contains uniform and appropriate information to the particular document.

SWG's Response:

Southwest Gas agrees with SED's recommendation and is in the process of developing standardized appendices. The new appendices will be completed and in place by September 30, 2019.

SED's Conclusion:

SED has reviewed SWG's response and accepts the corrective actions that it has articulated and implemented. SED may review the records of the corrective action during future inspections.

2. Question Does the process include steps for establishing and maintaining Text liaison with appropriate fire, police and other public officials and utility owners?

References 192.615(c) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)

Assets Covered GI-2019-01-SWG-30-03-04 (SWG OM&E)

Issue Summary Procedures in the Emergency Response Plan, Section 18 addresses liaison with Public Officials/Emergency Response Agencies. Section 18.1.1 states that the requirements for the liaison with public officials and emergency response agencies is in the Public Awareness Program Manual, Section 9. These procedures sufficiently address the procedures for maintaining liaison with first responders.

However, in the California Safety Plan required by CA PU Code 961, the note in Section 3.2.1.1 says "Fire departments that have attended a Division/District sponsored liaison event within the current calendar year ... are exempt from further provisions contained within this section." SWG stated that these liaison events are the public utilities meeting that are held annually in each of their divisions. SED disagrees that the public liaison meetings would meet the full extent of the requirements of the communications with the first responders. The public liaison meetings are very general and don't fully explore all the safety information that SWG should communicate with the fire

department (ex. how to deal with natural gas fires etc.). SED acknowledges that SWG appears to be attempting to reach each fire department regardless of whether or not they attended a liaison meeting, but believes that this language should not be included in the California Safety Plan.

SWG agreed that they will remove this note from the Safety Plan.

SWG's Response:

Southwest Gas agrees with SED's recommendation and has revised its California Safety Plan (Plan). The revised Plan was provided to the Commission as part of the GO 112F Annual Reporting submittal, as such a copy is not included with this response. The revision goes into effect April 30, 2019.

SED's Conclusion:

SED has reviewed SWG's response and accepts the corrective actions that it has articulated and implemented. SED may review the records of the corrective action during future inspection