

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 20, 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

Subject: 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 conducted a G.O. 112-F review and inspection of Southwest Gas Company's (SWG) Operation and Maintenance (O&M) Procedures updated on January 1, 2017 and its Emergency Response Program (ER) updated on January 28-31, 2019. SED staff reviewed SWG's written O&M procedures pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (CFR), Parts 191, 192 and 193 and used Pipeline and Hazardous Material Safety Administration's (PHMSA) Inspection Assistant (IA) as a reference guide to conduct the inspection.

SED's staff had two recommendations which is described in the enclosed "Summary of Inspection Findings".

Please provide a written response within 30 days of your receipt of this letter indicating the measures taken by SWG to address the observations noted in the Summary of Inspection Findings.

If you have any questions, please contact Michelle Wei, at (213) 620-2780 or by email: miw@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

CC: Michelle Wei, SED/GSRB

Laurie Brown, SWG, Kan Wai Tong, SED/GSRB, Matthewson Epuna, SED/GSRB

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 Text Does the process include procedures for ensuring the availability 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 the Appendices 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.

2. Question Text Does the process include steps for establishing and maintaining 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 states: "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 its Safety Plan.