

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 14, 2020

Jerry Schmitz
Vice President, Engineering
Southwest Gas Corporation
5241 Spring Mountain Road
Las Vegas, NV 89193-8510

GI-2020-06-SWG-30-07

Subject: SED's Closure Letter for the General Order (G.O.) 112-F Inspection of Southwest Gas Company's Operator Qualification Program

Dear Mr. Schmitz:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Southwest Gas Company's (SWG or "The Company") response letter dated July 6, 2020 for the findings identified during the G.O. 112-F Inspection of Southwest Gas Company's (SWG) Operator Qualification (OQ) Program on June 1-5, 2020.

A summary of the inspection findings documented by the SED, SWG's response to our findings, and SED's evaluation of SWG's response taken for each identified Violation is attached.

This letter serves as the official closure of the 2020 GO 112-F Inspection of SWG's OQ Program and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this inspection. If you have any questions, please contact Joel Tran at (415) 515-3442 or by email at Joel.Tran@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Terence Eng".

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

CC: Laurie Brown, SWG
Joel Tran, SED/GSRB
Dennis Lee, SED/GSRB
Kelly Dolcini, SED/GSRB
Claudia Almengor, SED/GSRB

Post-Inspection Written Preliminary Findings

Dates of Inspection: 6/1/2020 – 6/5/2020

Operator: SOUTHWEST GAS CORP

Operator ID: 18536

Inspection Systems: Operator Qualification Program

Assets (Unit IDs): Main Office (Specialized Inspections) (88373)

System Type: GT

Inspection Name: Southwest Gas Operator Qualification

Lead Inspector: Joel Tran

Operator Representative: Laurie Brown

Unsatisfactory Results

Generic Questions : Generic Questions (GENERIC.GENERIC)

Question Text Generic question

References 192.805

Assets Covered Main Office (Specialized Inspections) (88373 (30))

Issue Summary 192.805 states "Each operator shall have and follow a written qualification program."

While reviewing qualification records for Corrosion Specialists, SED noted one employee, Jeff E Shurley (OQ/PJQ Number: SWG12832), who was not re-qualified in 2016 for the *OQ-Damage Prevention During Excavation* covered task. Although Mr. Shurley did not perform any excavation activities during the calendar year 2016, Southwest Gas' Operator Qualification Plan requires Corrosion Specialists to be qualified once a year for this covered task. Mr. Shurley was qualified on 4/21/2015 with a subsequent re-qualification on 5/3/2017, missing the 2016 re-qualification.

SWG Response Southwest Gas acknowledges that one of its Corrosion Specialists' OQ-Damage Prevention During Excavation lapsed from January 1, 2017 to May 3, 2017, based on the requirements for his job position. During the inspection, the Company acknowledged the lapse and confirmed that the specialist had not performed any excavation activities during the lapsed period.

Since 2017, the Company has implemented several internal processes to help ensure lapses in OQ training/requalifications do not occur, as discussed during the inspection these include the following actions. The Company's Learning Management System (LMS) has been programmed to provide automated notifications to Company supervisors and individual employee 15 days prior to the expiration of an employees' operator qualification, if no action is taken by 7 days prior to the expiration date emails are automatically sent daily until the requalification is recorded. At this same time, the Operator Qualifications Program

Administrator is also notified of the pending expiration dates and takes actions, such as contacting the supervisor, the employee, and the Company's Division Based Trainer to determine why requalification training has not been completed. Furthermore, the Operator Qualification Plan Team has implemented a bi-monthly report of upcoming OQ expiration dates, which is provided to supervisors to help plan and schedule their employees for upcoming requalification training.

CPUC Conclusion SED reviewed the response from SWG and determined that SWG's remedial actions sufficiently address this violation. SED has opted not to impose a fine or penalty at this time.

Concerns

No Preliminary Concerns.