

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 8, 2019

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

GI-2018-10-SWG-05

RE: SED Closure Letter for the General Order (G.O.) 112-F Inspection of Southwest Gas Company's Public Awareness 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 January 10, 2019 regarding the findings identified in the G.O. 112-F inspection of SWG's Public Awareness and Emergency Response Programs (Inspection Unit) on October 15-18, 2018.

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 2018 G.O. 112-F inspection of the Public Awareness and Emergency Response Programs.

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 and 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: October 15-18, 2018

Operator: SOUTHWEST GAS CORP

Operator ID: 18536 (primary)

Inspection Systems: Public Awareness Program and Emergency Response Program

Assets (Unit IDs): GI-2018-10-SWG04-05 (88373)

System Type: GD

Inspection Name: SWG PAP

Lead Inspector: Michelle Wei

Operator Representative: Laurie Brown

Unsatisfactory Results

No Preliminary Findings.

Concerns

Topical Content (OO, PA, CRM) : Public Awareness Program Effectiveness (MISCTOPICS.PUBAWARE)

Question Text Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

References 192.616(g) (API RP 1162 Section 2.3.1)

Assets Covered GI-2018-10-SWG04-05 (SWG PAP)

Issue Summary In SWG's Public Awareness Plan the last paragraph of the Preface specifically states that the "...materials will be provided in other languages understood by a significant number and concentration of the non-English speaking population..." and that the most current US census is used to determine non-English speaking population. SED agrees that this meets the requirements of the code. However, we would also encourage you to include your stated threshold percentage for including an alternate language as well a listing of the other languages that you currently use in your materials so that your plan better reflects your process.

SWG's Response:

Southwest Gas appreciates SED's recommendation and has revised its Public Awareness Program to include its threshold percentage for providing materials in other languages, along with stating the languages currently being used in materials. The revised section of the Public

Awareness Program's Preface is provided below. The revised Public Awareness Plan is effective January 31, 2019.

“PA Programs will be conducted in all service areas of the Company. Materials will be provided in English and other languages commonly understood by at least 10 percent of the population. Within the Southwest Gas service territory, Spanish is the only language that meets that threshold. The most current U.S. census or other means will be used to determine non-English speaking population.”

SED's Conclusion:

SED has reviewed SDG&E'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.