

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 22, 2017

GI-2017-11-SWG30-06

Jerry Schmitz (jerry.schmitz@swgas.com)
Vice President/Engineering
Southwest Gas Corporation
P. O. Box 98510, LVA-581
Las Vegas, NV 89193-8510

SUBJECT: General Order 112-F Gas Inspection of Southwest Gas Corporation's Anti-Drug and Alcohol Misuse Prevention Programs

Dear Mr. Schmitz:

The Safety Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F inspection of Southwest Gas Corporation's (SWG) Anti-Drug and Alcohol Misuse Prevention Programs from November 6 through 9, 2017. SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular written procedures that SED reviewed during the inspection.

SED staff made two recommendations during the course of this inspection, which are described in the enclosed "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.

If you have any questions, please contact Alula Gebremedhin at (415) 703-1816 or by email at ag5@cpuc.ca.gov.

Sincerely,

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

Kenneth Bruno
Program Manager
Safety and Enforcement Division, CPUC

cc:

Erich Trombley, Southwest Gas
Laurie Brown, Southwest Gas
Dennis Lee, SED
Matt Epuna, SED
Kan-Wai Tong, SED
Kelly Dolcini, SED

SUMMARY OF INSPECTION FINDINGS

A. SED Findings

SED found no violations.

B. Areas of Concern / Observations / Recommendations

1. During record review, SED reviewed SWG's audits of their collection sites. In 2013, SWG had conducted audits of all of their collection sites. Since then, they have relied on AWSI (their third party administrator) to conduct audits on their behalf. However, AWSI does not conduct a review of all collection sites, but rather selects a portion of them each year on a sampling basis. Furthermore, AWSI's audit pool includes all of the collection sites that their members, in the whole country, might use, and not just the ones used by SWG.

Therefore, in order that SWG may be assured that their collection sites meet PHMSA requirements, SED recommends that SWG conduct these audits themselves on a regular basis or to closely monitor their collection sites have been audited by AWSI.

2. During record review, SED noted two items in SWG's plan (Appendix B – Designated Personnel and Service Agents) that was not up-to-date.

- I. SWG lists Quest Laboratories Headquarters in Lenexa, KS as their drug testing laboratory. However, upon further review, the actual location for the sample analysis is the Quest Laboratory in West Hills, CA. SED is required to verify that the drug testing laboratory is certified by the Department of Health and Human Services.

Therefore, SED recommends that SWG list the West Hills location as their laboratory of record in their plan.

- II. AWSI informed us that the source for referring Substance Abuse Professionals (SAPs) was no longer in business. SWG had not realized this because they do not often require the services of an SAP. However, SWG's plan needs to accurately reflect the process by which their employees would be referred to an SAP.

Therefore, this source needs to be updated.