

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 3, 2025

GI-2025-04-SWG-30-06

Mr. Kevin Lang (kevin.lang@swgas.com)
Vice President Engineering Staff
Southwest Gas Corporation
8360 South Durango Road
Las Vegas, NV 89113

Subject: General Order (G.O.) 112-F Compliance Inspection of Southwest Gas Corporation's Anti-Drug and Alcohol Prevention Program

Dear Mr. Lang:

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 Prevention Program (D&A Program)** on April 21 through 25, 2025. SED staff reviewed SWG's written D & A Program and conducted a field observation pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (CFR), Parts 199 and 40. The inspection also included a review of SWG's D&A records from calendar years 2021 through 2024. SED used the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety's "Inspection Assistant Form" (IA) as a reference guide to conduct the inspection.

SED staff identified two (2) areas of concern which are described in the enclosed "Post-Inspection written Preliminary Findings".

Please provide a written response within 30 days of your receipt of this letter indicating the measures taken by SWG to address the areas of concern noted.

Thank you for your cooperation in this inspection. If you have any questions, please contact Gordon Kuo, at (213) 618-5263 or by email: gk2@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng".

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

Attachments: see Post-Inspection Written Preliminary Findings
cc: see next page

Laurie Brown
Administrator/Compliance, Engineering Services
Southwest Gas Corporation
8360 South Durango Road
Las Vegas, NV 89113
Laurie.brown@swgas.com

Mahmoud (Steve) Intably, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Gordon Kuo, P.E.
Senior Utilities Engineer, Specialist
Gas Safety and Reliability Branch
Safety and Enforcement Division

Claudia Almengor
Associate Governmental Program Analyst
Gas Safety and Reliability Branch
Safety and Enforcement Division

Post-Inspection Written Preliminary Findings

Dates of Inspection: 4/21/25-4/25/25

Operator: SOUTHWEST GAS CORP

Operator ID: 18536 (primary)

Inspection Systems: Anti-Drug and Alcohol Prevention Program

Assets (Unit IDs) with results in this report: GI-2025-04-SWG-30-06 (88373)

System Type: DA

Inspection Name: SWG D&A 2025 Inspection

Lead Inspector: Gordon Kuo

Operator Representative: Laurie Brown

Unsatisfactory Results

No Preliminary Findings.

Concerns

Drug and Alcohol : Anti-Drug Program (DA.DRUG)

1. Question Title, MRO Drug Test Reports to the Operator, DA.DRUG.MROTESTREPORTS.P ID

Question 11. Does the process ensure the MRO reports all drug test results to the DER as required?

References 199.109(d) (Part 40 Subpart G, 40.345(a), 40.345(b), 40.345(c), 40.355(b), 40.355(c))

Assets Covered GI-2025-04-SWG-30-06 (SWG Drug and Alcohol)

Issue Summary Title 49 CFR §40.345(a) states:

"In every case, you must ensure that, in transmitting information to employers, you meet all requirements (e.g., concerning confidentiality and timing) that would apply if the service agent originating the information (e.g., an MRO or collector) sent the information directly to the employer. For example, if you transmit drug testing results from MROs to DERs, you

must transmit each drug test result to the DER in compliance with the MRO requirements set forth in § 40.167"

Title 49 CFR §40.167(b) states:

"You must transmit to the DER on the same day the MRO verifies the result or the next business day all verified positive test results, results requiring an immediate collection under direct observation, adulterated or substituted specimen results, and other refusals to test."

Title 49 CFR §40.167(c) states:

"You must transmit the MRO's report(s) of verified tests to the DER so that the DER receives it within two days of verification by the MRO."

The Southwest Gas Drug and Alcohol Policy Section XVII, Subsection G states:

"All drug test results will be reported to the Company DER in a confidential and timely manner."

SWG's D&A Policy requires that all drug test results be reported to the Company DER in a "timely manner". To ensure consistency with the above regulations, SED recommends SWG to include the above set time limit in its D&A Policy so that the positive results are transmitted to the DER "on the same day" the MRO verified the result or by the "next business day" for all verified tests result. In addition, SED recommends that SWG to include the above set time limit in its D&A Policy so that the DER must receive the MRO's report(s) of verified tests "within two days" of verification by the MRO.

Drug and Alcohol : Alcohol Misuse Prevention Program (DA.ALCOHOL)

2. Question Title, BAT Alcohol Confirmation Test Reports, DA.ALCOHOL.CONFIRMATIONTEST.P
ID

Question 12. Does the process ensure that alcohol confirmation test results are reported as required to the DER?

References 40.255(a) (40.355(d))

Assets Covered GI-2025-04-SWG-30-06 (SWG Drug and Alcohol)

Issue Summary Title 49 CFR §40.255(a)(5) states in part:

"(a) After the EBT has printed the result of an alcohol confirmation test, you must, as the BAT, take the following additional steps:

(5) Immediately transmit the result directly to the DER in a confidential manner."

SWG's Anti-Drug and Alcohol Misuse Prevention Policy, Section XIII.H states in Part:

"If the alcohol confirmation test result is lower than 0.02, nothing further is required of the employee. If the alcohol confirmation test result is 0.02 or higher, the BAT will immediately transmit the result directly to the DER in a confidential manner."

SWG's Anti-Drug and Alcohol Misuse Prevention Policy, Section XIII.H requires the BAT to report the result of 0.02 or higher to the DER, but it requires no further action if the test result is 0.02 or lower. Title 49 CFR §40.255(a)(5) requires all alcohol confirmation test results to be reported to the DER. SED recommends that SWG amend Section XIII.H of its Anti-Drug and Alcohol Misuse Prevention Policy to correctly reflect the requirements set forth in Title 49 CFR §40.255(a)(5).