



SOUTHWEST GAS CORPORATION

November 10, 2021

Via Email

Mr. Matthewson Epuna
Program and Project Supervisor
State of California Public Utilities Commission
Gas Safety and Reliability Branch
Safety and Enforcement Division
505 Van Ness Avenue
San Francisco, CA 94102-3298

Re: Notice of Gas Incident Violation for Southwest Gas Corporation in Q-3 2021

Dear Mr. Epuna,

Southwest Gas Corporation (Southwest Gas or Company) respectfully submits the enclosed response to your letter dated October 11, 2021. The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) sent Notice of Probable Violations (NOPV) for non-DOT reportable incident investigations completed in the third quarter of 2021 (Q3-2021).

Southwest Gas appreciates Staff's consideration of this matter. Please do not hesitate to contact me if there are any questions or concerns.

Sincerely,

Jerome T. Schmitz, P.E.
Vice President, Engineering Staff

cc: Amy Timperley Valerie Ontiveroz
Brad Harris Mohammad Ali, CPUC
Catherine Mazzeo Terence Eng, CPUC
Kevin Lang



**SOUTHWEST GAS CORPORATION RESPONSES TO
NOTICE OF GAS INCIDENT VIOLATIONS FOR
NON-DOT REPORTABLE INVESTIGATIONS IN Q-3 2021**

Probable Violations

1. ■ 1st Street, Barstow, San Bernardino County; CPUC ID #G20201120-3146

SED Investigative Findings:

On November 19, 2020, at approximately 0925 hours, a Southwest Gas (SWG) construction inspector reported no gas pressure in its service line when revisiting its recent construction project. SED's investigation found that the incident was caused by a malfunctioned SWG's 2-inch PE EFV installed on a new service line. This subsequently led to an unplanned service outage to one commercial customer. Additionally, since SWG failed to report the incident to SED in a timely manner, SED finds SWG in violation of General Order (GO) 112-F, §122.2(b)(1).

Southwest Gas Response:

Southwest Gas acknowledges that a 2-inch PE EFV appeared to malfunction. However, the EFV was submitted to the Company's Lab for a material investigation. The Lab could not duplicate any malfunction. Southwest Gas believes that this was an anomaly, as the Company has installed thousands of EFV's without any issue. The EFV reset when tested in the Lab. The debris found in the EFV at the time of examination was not significant enough to prevent the EFV from resetting. Additional information indicates that a more likely scenario is that the EFV most likely was not given enough time to reset prior to commissioning the service. Company procedures and training are being revised to provide guidance on timing for reset on the larger EFVs which will be included in the Company's March 31, 2022 manual release. The new EFV worked properly during installation and relight was completed without further issue. Regarding the delayed reporting, the situation was immediately reported to Division Construction Supervision, but unfortunately the Duty Manager On-Call delayed in making the notification until the next day. As a reminder to all Duty Managers, and to help prevent a reoccurrence, refresher training was provided to all Southern California Division Duty Managers on March 30, 2021.



2. [REDACTED] Kendall Road, Lucerne Valley, San Bernardino County; CPUC ID #G20201121-3147

SED Investigative Findings:

On November 21, 2020, at approximately 2054 hours, a Southwest Gas (SWG) customer's natural gas service was interrupted. SED's investigation found that the incident was caused by SWG's contractor, Arizona Pipeline, failing to follow SWG's procedures in purging a SWG service line at the end of an installation. This resulted in the unplanned service outage. Therefore, SED finds SWG in violation of General Order (GO) 112-F, Reference Title 49 Code of Federal Regulations, Part 192, Section 192.605(a).

Southwest Gas Response:

Southwest Gas acknowledges that its contractor failed to follow proper purging procedures which resulted in an under-pressure situation causing one unplanned service outage. As discussed in the Company's data request response dated December 8, 2020, the contract employee was disqualified, retrained, and requalified. In addition, all contract foremen working in the Southern California Division received refresher training on December 1, 2020. A copy of the training sign-in sheet, along with the contract employee's disqualification/requalification records, were provided to SED on July 26, 2021 as part of a data request response.

3. [REDACTED] Kendall Road, Lucerne Valley, San Bernardino County; CPUC ID #G20201215-3159

SED Investigative Findings:

On December 15, 2020, at approximately 1720 hours, Southwest Gas Corporation (SWG) received a call of no gas at [REDACTED] Kendall Road, Lucerne Valley. There were no injuries, fatalities, fire, or third-party damage reported as a result of this incident. Safety and Enforcement Division (SED) investigation found that the incident was caused by SWG failing to follow its Operations Manual, Posting Procedure, Section 1.4.2.1 by not placing the service on the construction plans provided to its contractor, Arizona Pipeline Company (APL). Therefore, SED finds SWG in violation of General Order (GO) 112-F, Reference Title 49 of Code of Federal Regulations (CFR), Part 192, §192.605(b)(3) for failure to make construction records available to appropriate operating personnel.

Southwest Gas Response:

Southwest Gas acknowledges that the under-pressure situation was due to its contractor receiving construction drawings that did not depict a new installed service line.



Southwest Gas made construction records available to its contractor by providing the project design and access to the Company's construction records and mapping system. However, due to a delay in posting, the new installed service had not been added to these systems. The Company provided information on previous data requests that showed the new service was installed in January 2020, with the as-built being received by Division GIS in April 2020. The new replacement project was being designed which caused the service to be left off the design that was provided to the contractor. Southwest Gas implemented several initiatives over the past 18 months to improve its posting process to shorten posting times and identify work performed in the area of other projects to ensure the appropriate personnel has access to the most current information.

4. ■■■ Chateau Way, Barstow, San Bernardino County; CPUC ID #G20210413-3207

SED Investigative Findings:

On April 13, 2021, at approximately 0905 hours, Southwest Gas Corporation (SWG) received a call of no gas at ■■■ Chateau Way, Barstow. There were no injuries, fatalities, fire, or third-party damage reported as the result of this incident. Safety and Enforcement Division (SED) investigation found that the incident was caused by SWG's contractor, Arizona Pipeline Company (APL) failing to follow SWG's Operations Manual, Abandonment Procedure, Section 1.1.2, confirming feed location. Therefore, SED finds SWG's contractor, APL in violation of General Order (GO) 112-F, Reference Title 49 of Code of Federal Regulations (CFR), Part 192, §192.605(a) for failure to follow SWG's Operation Manual, Abandonment Procedure.

Southwest Gas Response:

Southwest Gas acknowledges that its contractor failed to perform a confirmatory locate on an active riser while performing a stub abandonment resulting in an under-pressure situation and an unplanned outage of an active service. The Company, as noted in its 30-day follow up report which was submitted on May 10, 2021, disqualified two contractor personnel on task OQ-1291 Locate Underground Pipelines, for failure to conduct a confirmatory locate. Both individuals were retrained and requalified for this task in May 2021.