



SOUTHWEST GAS CORPORATION

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

July 27, 2017

Mr. Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 West 4th Street, Suite 500
Los Angeles, CA 90013

Subject: General Order 112F Inspection of Southwest Gas Corporation Emergency Management Program

Dear Mr. Bruno,

Southwest Gas Corporation respectfully submits the following response to the Safety Enforcement Division's (SED) Summary of Inspection Findings dated June 27, 2017. The response addresses the Probable Violation identified by SED during the inspection.

We appreciate SED's consideration of this matter. Please do not hesitate to contact me if there are any questions or concerns.

Sincerely,

cc: M. Epuna (CPUC)
D. Lee (CPUC)
C. Mazzeo
K. Lang
V. Ontiveroz



SUMMARY OF INSPECTION FINDINGS

I. Probable Violations

1. Title 49 CFR §192.616 states in part:

“(b) The operator's program must follow the general program recommendations of API RP 1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.”

API Recommended Practice 1162, First Edition, December 2003, Section 2.3.2 Emergency Responder Liaison Activities (49 CFR Parts 192.615 and 195.402) states:

“These regulations require that operators establish and maintain liaison with fire, police and other appropriate public officials and coordinate with them on emergency exercises or drills and actual responses during emergency.”

SED reviewed emergency exercise or drill documentation for the Northern Nevada and Southern California Divisions as follows:

Table 1. Summary of Emergency Exercises

Northern Nevada Division	Southern California Division
2015 District 14, 15 & 23 Emergency Response Drill	2015 SCD Emergency Exercise in Victorville
2015 District 16 & 23 Emergency Response Drill	

The documentation reviewed by SED for emergency exercises listed in Table 1 did not indicate that the Southern California Division coordinated with fire, police and other appropriated public officials on emergency exercises or drills.

SWG provided additional documentation which demonstrated the Northern Nevada Division participated in the North Tahoe – Truckee Joint Emergency Tabletop/Functional Exercise and coordinated with fire, police and other public officials.

SWG is in violation of Title 49 CFR §192.616 because it failed to coordinate with fire, police and other appropriate public officials on emergency exercises or drills in the Southern California Division.



Southwest Gas Response

Southwest Gas agrees that including emergency responders in drills or tabletop emergency exercises is valuable. Southwest Gas routinely engages with first responders in its California service territory, and does participate in joint emergency response training and exercises. Recent examples include a Utility Strike Demonstration (San Bernardino), a Shake-Out Scenario (Cajon Pass), and Emergency Response Tabletop Exercises (Truckee). The Company also participates in fire and police department training in its California service territory which includes, among other things, discussion of segments of the Company's Emergency Plan Manual (EPM), emergency notifications, and response protocol. To further enhance this effort, Southwest Gas is initiating the development and implementation of new procedures, which will take effect in January 2018, to organize or attend at least one coordinated drill or exercise each year.

Consistent with 49 CFR §192.616, Southwest Gas' Public Awareness Program follows the "general program recommendations"¹ associated with a Baseline Public Awareness Program in all respects, including but not limited to program objectives, target audiences, message development and delivery, program evaluation, and recordkeeping. Further, Southwest Gas understands that conducting joint tabletop exercises or other emergency drills with emergency responders is characterized by API RP 1162 as supplemental program activity.² As supplemental activities, these drills or exercises exceed the general API RP 1162 Baseline Public Awareness Program recommendations referenced in the Code; therefore, Southwest Gas submits that no 49 CFR §192.616 violation occurred.

While API RP 1162, Section 2.3.2 summarizes the regulatory requirements related to 49 CFR §192.615 for the purposes of "developing a framework for Public Awareness Programs",³ it does not reflect the actual language found in 49 CFR §192.615(a)(8). Southwest Gas acknowledges that 49 CFR §192.615(a)(8) requires operators to have an emergency plan that provides for, "[n]otifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency." The Company fulfills this Code requirement by sharing its planned response to an emergency, as detailed in its EPM, with emergency responders during annual liaison meetings. The Company complies with the requirement to coordinate actual responses during emergencies through Section 4.2.7 of its EPM.

As noted above, Southwest Gas recognizes and appreciates the value that comes from partnering with first responders on emergency exercises or drills, and will be developing and implementing new procedures to ensure that coordinated activities occur once each year.

¹ 49 CFR 192.616(b).

² API RP 1162 (2003), Table2-1.

³ API RP 1162 (2003), Section 2.