



## **SOUTHWEST GAS CORPORATION**

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

April 18, 2019

*Via Email and U.S. Mail*

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

**SUBJECT: General Order (G.O.) 112-F Inspection of Southwest Gas Company's Operation and Maintenance Procedures and Emergency Response Programs**

Dear Mr. Bruno:

Southwest Gas Corporation (Southwest Gas or Company) respectfully submits the enclosed response to your letter dated March 20, 2019, regarding a G.O. 112-F review and inspection of the Company's Operation and Maintenance (O&M) Procedures and its Emergency Response Program (ER) conducted January 28-31, 2019 in which Safety and Enforcement Division (SED) identified two recommendations.

Should you have any questions, please feel free to contact me.

Sincerely,

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

js/lb

cc: Kevin Lang  
Brad Harris  
Valerie Ontiveroz  
Kan Wai Tong, CPUC  
Matthewson Epuna, CPUC  
Michelle Wei, CPUC



## **INSPECTION SUMMARY**

The Safety and Enforcement Division (SED) of the California Public Utilities Commission staff reviewed SWG's written O&M procedures pursuant to G.O. 112-F, Reference Title 49, Code of Federal Regulations (CFR), Parts 191, 192 and 193 and used Pipeline and Hazardous Material Safety Administration's (PHMSA) Inspection Assistant (IA) as a referenced guide to conduct the inspection.

### **Recommendation #1**

While reviewing the Appendices for SWG's Emergency Plan, SED noted that the format and information contained in the Appendices differed from division to division. For example, Appendix B should contain a "list of tools, equipment, and materials available for response to emergencies" (Emergency Plan, Section 11.2.1). Each of the three divisions that operate in California included a parts list. However, Needles/Bullhead City also included a list of emergency equipment that is housed on each of their types of vehicles and Southern California included a list of vehicles and their capabilities. Appendix C is to be a "list of vehicles, mobile and fixed communications equipment, available for emergencies" (Emergency Plan, Section 11.3.1). Some divisions listed only radio and communication information, while others also included a list of vehicles. SED recommends that SWG to standardize these forms company-wide, or at least state-wide, in order to ensure that each appendix contains uniform and appropriate information to the particular document.

**Southwest Gas Response:** Southwest Gas agrees with SED's recommendation and is in the process of developing standardized appendices. The new appendices will be completed and in place by September 30, 2019.

### **Recommendation #2**

Procedures in the Emergency Response Plan, Section 18 addresses liaison with Public Officials/Emergency Response Agencies. Section 18.1.1 states that the requirements for the liaison with public officials and emergency response agencies is in the Public Awareness Program Manual, Section 9. These procedures sufficiently address the procedures for maintaining liaison with first responders. However, in the California Safety Plan required by CA PU Code 961, the note in Section 3.2.1.1 states: "Fire departments that have attended a Division/District sponsored liaison event within the current calendar year ... are exempt from further provisions contained within this section." SWG stated that these liaison events are the public utilities meeting that are held annually in each of their divisions. SED disagrees that the public liaison meetings would meet the full extent of the requirements of the communications with the first responders. The public liaison meetings are very general and don't fully explore all the safety information that SWG should communicate with the fire department (ex. how to deal with natural gas fires etc.). SED acknowledges that SWG appears to be attempting to reach each fire department regardless of whether or not they attended a liaison meeting



but believes that this language should not be included in the California Safety Plan. SWG agreed that they will remove this note from its Safety Plan.

**Southwest Gas Response:** Southwest Gas agrees with SED's recommendation and has revised its California Safety Plan (Plan). The revised Plan was provided to the Commission as part of the GO 112F Annual Reporting submittal, as such a copy is not included with this response. The revision goes into effect April 30, 2019.