



SOUTHWEST GAS CORPORATION

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

January 10, 2019

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

SUBJECT: General Order 112-E Inspection of Southwest Gas Corporation's Public Awareness and Emergency Response Programs

Dear Mr. Bruno:

Southwest Gas Corporation (Southwest Gas or Company) respectfully submits the attached response to SED's Summary of Inspection Findings letter for the General Order 112-E Inspection of Southwest Gas Corporation's Public Awareness and Emergency Response Programs conducted October 15-18, 2018.

We appreciate Staff's consideration of this matter and look forward to discussing any questions or concerns that you may have.

Sincerely,

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

Attachment

cc:	Jose Esparza, Jr.	Matthewson Epuna, CPUC
	Kevin Lang	Kan Wai Tong, CPUC
	Valerie Ontiveroz	Michelle Wei, CPUC
	Claudia Almengor, CPUC	



SUMMARY OF INSPECTION FINDINGS

Areas of Concern / Observations / Recommendations

Topical Content (OQ, PA, CRM): Public Awareness Program Effectiveness (MISCTOPICS.PUBAWARE)

Question Text Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

References 192.616(g) (API RP 1162 Section 2.3.1)

Assets Covered GI-2018-10-SWG04-05 (SWG PAP)

Issue Summary In SWG's Public Awareness Plan the last paragraph of the Preface specifically states that the "...materials will be provided in other languages understood by a significant number and concentration of the non-English speaking population..." and that the most current US census is used to determine non-English speaking population. SED agrees that this meets the requirements of the code. However, we would also encourage you to include your stated threshold percentage for including an alternate language as well a listing of the other languages that you currently use in your materials so that your plan better reflects your process.

Southwest Gas Response:

Southwest Gas appreciates SED's recommendation and has revised its Public Awareness Program to include its threshold percentage for providing materials in other languages, along with stating the languages currently being used in materials. The revised section of the Public Awareness Program's Preface is provided below. The revised Public Awareness Plan is effective January 31, 2019.

Public Awareness Program, Preface, paragraph 3:

"PA Programs will be conducted in all service areas of the Company. Materials will be provided in English and other languages commonly understood by at least 10 percent of the population. Within the Southwest Gas service territory, Spanish is the only language that meets that threshold. The most current U.S. census or other means will be used to determine non-English speaking population."