



SOUTHWEST GAS CORPORATION

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

December 20, 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 Gas Inspection of Southwest Gas Corporation's Anti-Drug and Alcohol Misuse Prevention Program

Dear Mr. Bruno,

Southwest Gas Corporation (Southwest Gas or Company) respectfully submits the attached response to the "Summary of Inspection Findings" issued by the Safety and Enforcement Division (SED) on November 22, 2017, with respect to its General Order 112F Inspection of Southwest Gas Corporation's Anti-Drug and Alcohol Misuse Prevention Program conducted November 6-9, 2017.

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

Sincerely,

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



B. Areas of Concern / Observations / Recommendations

1. During record review, SED reviewed SWG's audits of their collection sites. In 2013, SWG had conducted audits of all of their collection sites. Since then, they have relied on AWSI (their third party administrator) to conduct audits on their behalf. However, AWSI does not conduct a review of all collection sites, but rather selects a portion of them each year on a sampling basis. Furthermore, AWSI's audit pool includes all of the collection sites that their members, in the whole country, might use, and not just the ones used by SWG.

Therefore, in order that SWG may be assured that their collection sites meet PHMSA requirements, SED recommends that SWG conduct these audits themselves on a regular basis or to closely monitor their collection sites have been audited by AWSI.

Southwest Gas Response:

Southwest Gas appreciates SED's recommendation. Southwest Gas will continue to work with AWSI to closely monitor the review of the Company's collection sites and will perform regular reviews for those sites not covered by AWSI.

2. During record review, SED noted two items in SWG's plan (Appendix B – Designated Personnel and Service Agents) that was not up-to-date.
 - I. SWG lists Quest Laboratories Headquarters in Lenexa, KS as their drug testing laboratory. However, upon further review, the actual location for the sample analysis is the Quest Laboratory in West Hills, CA. SED is required to verify that the drug testing laboratory is certified by the Department of Health and Human Services.

Therefore, SED recommends that SWG list the West Hills location as their laboratory of record in their plan.

Southwest Gas Response:

Southwest Gas appreciates SED's recommendation. However, the Company's reference to the Quest Laboratories' headquarters in Lenexa, Kansas as the testing laboratory of record is intentional. The Lenexa location dictates which regional facility receives samples from the collection site. Southwest Gas suspects that the West Hills laboratory may receive most of its samples for analysis, however, it may not be the only laboratory that is utilized for every sample. Although the Company believes it is appropriate to continue listing the Lenexa, Kansas location as the testing laboratory of record, it understands the importance of ensuring that the laboratory being utilized is certified by the Department of Health and Human Services (HHS). Attached is a copy of the *State List of HHS Certified*

General Order 112F Gas Inspection of Southwest Gas Corporation's Anti-Drug and Alcohol Misuse Prevention Program

Page 3 of 3



Laboratories and Instrumented Initial Testing Facilities, which lists all Quest Laboratory locations, including the West Hills location, as certified laboratories.

- II. AWSI informed us that the source for referring Substance Abuse Professionals (SAPs) was no longer in business. SWG had not realized this because they do not often require the services of an SAP. However, SWG's plan needs to accurately reflect the process by which their employees would be referred to an SAP.

Therefore, this source needs to be updated.

Southwest Gas Response:

Southwest Gas agrees with SED's recommendation and has updated its plan to reflect the current contact for referring employees to a SAP.