



SOUTHWEST GAS CORPORATION

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

September 13, 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 (G.O.) 112 Inspection of Southwest Gas Corporation, South and North Lake Tahoe and Truckee, Districts 14, 15 and 16, Summary Letter

Dear Mr. Bruno,

Southwest Gas Corporation (Southwest Gas or Company) respectfully submits the attached response to the "Summary of Inspection Findings" (Summary) issued by the Safety and Enforcement Division (SED) on August 14, 2017, with respect to its General Order 112 Inspection of Southwest Gas Corporation, South and North Lake Tahoe and Truckee, Districts 14, 15 and 16, on June 20-23, 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)
A. Cauguiran (CPUC)
K. Dolcini (CPUC)
K. Lang
C. Mazzeo
V. Ontiveroz



A. Areas of Concern, Observations, and Recommendations

1. On 6/21/2017 and 6/22/2017, SED observed SWG employees perform odorant sniff tests in each district of the SWG Division. On each occasion, the SWG employees did not leak Check the supply line connection to the Odorometer instrument (instrument). A leak on or near the gas connection to the instrument could potentially influence the accuracy of the sniff test. SED recommends SWG consider soap testing the natural gas connection to the instrument to ensure no leaks are influencing the results of the sniff test.

Southwest Gas Response:

Southwest Gas will revise its Operations Manual to require that the natural gas supply line connection be checked for leakage prior to starting the odorant test. The method for conducting the leak check will also be included. The revision will be included in the next scheduled Operations Manual release scheduled for December 2017.