



SOUTHWEST GAS CORPORATION

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

November 22, 2023

Via Email

Mr. Terence Eng, P.E.
Program Manager
State of California Public Utilities Commission
Gas Safety and Reliability Branch
Safety and Enforcement Division
505 Van Ness Avenue
San Francisco, CA 94102-3298

RE: GO 112-F Compliance Inspection of Southwest Gas's DPP, PAP and ERP programs

Dear Mr. Eng,

Southwest Gas Corporation (Southwest Gas or Company) respectfully submits the enclosed response to your letter dated October 27, 2023. The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) conducted an inspection of the Damage Prevention Program (DPP), Public Awareness Program (PAP), and Emergency Response Program (ERP) programs July 24 – 28, 2023 including field observations of Southwest Gas's pipeline locate and mark activities.

Southwest Gas appreciates Staff's consideration of this matter. Please do not hesitate to contact me if there are any questions or concerns.

Sincerely,

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

cc: Kevin Lang
Shane Thacker
Valerie Ontiveros

Matthewson Epuna, CPUC
Claudia Almengor, CPUC
Sann Naing, CPUC



Post-Inspection Written Preliminary Findings

Dates of Inspection: July 24-28, 2023

Operator: SOUTHWEST GAS CORP

Operator ID: 18536 (primary)

Inspection Systems: DPP, ER, and PAP

Assets (Unit IDs) with results in this report: Main Office (Specialized Inspections) (88373)

System Type: GD

Inspection Name: 2023 SWG DP, PA and ER

Lead Inspector: Sann Naing

Operator Representative: Laurie Brown

Unsatisfactory Results

No Preliminary Findings.

Concerns

Emergency Preparedness and Response : Emergency Response (EP.ERG)

Question Title, ID Receiving Notices, EP.ERG.NOTICES.P

Question 1. Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?



References 192.615(a)(1)

Assets Covered Main Office (Specialized Inspections) (88373 (30))

Issue Summary Southwest Gas Corporation (SWG)’s Emergency Plan Manual (Issue date: 06/01/2023), Section 3 describes emergency calls, which are to be dispatched, and procedures for employees receiving the notifications to coordinate with callers. However, SWG neither stated in its manual whether or not the operator can be contacted at any hour of the day to receive notifications of a pipeline system emergency, nor did it list the operator’s contact phone number.

During SED’s discussion with SWG’s compliance team, SWG stated that it has a designated number and that SWG’s staff responds appropriately to the emergency calls 24/7. SED recommends that SWG should include the stated information and the process in its written plan.

Southwest Gas Response:

Southwest Gas acknowledges SED’s recommendation to include a statement that the Company responds to emergency calls 24/7 with its phone number and the process. Southwest Gas respectfully disagrees with this recommendation as the Emergency Plan Manual is written as an internal document for the Company’s emergency response procedures and information and is not available to the public. Southwest Gas already makes its emergency number available to the public in a variety of ways, including, but not limited to, through its public facing website, social media posts, radio public service announcements, brochures and flyers mailed or emailed to customers, and on Company facility signage.

Regarding the process, Southwest Gas already has a process outlined in Section 3 Receiving Emergency Calls in its Emergency Plan. This section directs Company employees on the information to obtain from the caller and the instructions to give the caller when receiving emergency calls.

Public Awareness and Damage Prevention : Damage Prevention (PD.DP)

Question Title, ID Documented Damage Prevention Program – TPD, PD.DP.TPD.P

Question 4. Does the process specify how reports of Third-Party Activity and names of associated contractors or excavators are input back into



the mail-outs and communications with excavators along the system?

References 192.614I(1)

Assets Covered Main Office (Specialized Inspections) (88373 (30))

Issue Summary SWG stated that it composes an excavator notification mail-out list to notify contractors of SWG’s damage prevention program. SWG also stated that the list includes all excavators who requested the excavation notifications to One-Call centers in SWG gas pipeline service territories. SWG confirmed that excavators stay on the list indefinitely and they are taken off the list only when SWG becomes aware that an excavator is out of business (i.e. getting return mails from those particular excavators). However, SWG needs to improve its record keeping regarding excavator notifications. During review of SWG’s excavator related records, SED noted the following:

1. An excavator, [REDACTED], who damaged SWG gas pipeline at [REDACTED], Victorville on 07/28/2021 was still listed in SWG’s 2022 excavator mailing list as having no address (Unknown) despite the fact the excavator’s actual address was listed in SWG’s Damage Cause Database (DCD) 304 Report (SWG Record ID 40612).
2. An excavator, [REDACTED], had an excavation notification ticket (A212211129) for a project on [REDACTED] Apple Valley, CA 92307 in August 2021, that was not in the SWG’s 2022 actual mailing list. Based on the address of the project, the excavation was within the SWG pipeline service territory.
3. SWG maintains separate excavator notification tickets for each district in its California service territories which are comprised of Needles, Northern California, and Southern California districts. SED noted that there were discrepancies between the combined total tickets from all three districts and SWG’s reported ticket count in its PHMSA annual reports. For 2022, as an example, SWG’s combined three districts total ticket number was 61345 while its PHMSA annual reported number was 61483. SWG explained that it uses the data from One-Call centers for annual reporting, while, on the other hand, it uses the internal ticket management system (Irthnet) data for district ticket counts. SED recommends that SWG identify the cause of the data discrepancies and remediate it.



Southwest Gas Response:

Southwest Gas respectively acknowledges SED’s comments and recommendations related to its excavators mailing list and excavator notification ticket numbers. Southwest Gas has reviewed its internal processes and will be implementing additional steps to confirm excavator addresses are added to the excavator mailing list when entered into the Company’s Damage Cause Database (DCD).

Southwest Gas has added [REDACTED] physical address in the Company’s database, and they will be included in the 2024 annual mailings, as well as all eblasts going forward. Southwest Gas confirmed that [REDACTED] email address was included in the database, and they did receive the 2022 annual excavator mailing as part of an eblast. Additionally, they were included in the supplemental collaborative excavator mailing Southwest Gas participates in with the Pipeline Association for Public Awareness (PAPA).

Southwest Gas confirmed that [REDACTED] physical address was added to the excavator mailing list in April 2023 and was included in the 2023 annual mailing. Southwest Gas confirmed that [REDACTED] email address was included in the database, and they did receive the 2022 annual excavator mailing as part of an eblast. Additionally, they were included in the supplemental collaborative excavator mailing Southwest Gas participates in with PAPA.

Regarding SED’s recommendation to identify the cause of the data discrepancy between the One-Call Center’s data and Southwest Gas’s internal ticket management system (IRTH) and remediate it. Southwest Gas is aware that data discrepancies can occur if filters (ticket types, codes, etc.) are set to pull data from IRTH differ from One-Call Center criteria. The Company would like to note that its database of record for compliance reporting (PHMSA Reporting, GO 112F Reporting, etc.) is the One-Call Center’s data. However, Southwest Gas will review One-Call Center ticket report criteria with IRTH ticket report criteria to determine data discrepancies and remediation feasibility. SWG will continue to utilize One-Call Center data for compliance reporting to ensure long term consistency and data accuracy directly from the original source.