

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

March 12, 2024

GI-2023-07-SWG-30-04-05-06

Mr. Jerry Schmitz  
Vice President, Engineering  
Southwest Gas Corporation  
8360 South Durango Road  
Las Vegas, NV 89113

**Subject: SED Closure letter for G.O. 112-F Compliance Inspection of SWG's DPP, PAP, and ERP programs**

Dear Mr. Schmitz:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) reviewed Southwest Gas Corporation's (SWG) response letter, dated November 22, 2023, that addressed two (2) areas of concern, identified during SED's inspection of SWG's Damage Prevention Program (DPP), Public Awareness Program (PAP), and Emergency Response Program (ERP) on July 24 through 28 of 2023.

Attached is a summary of SED's inspection findings, SWG's response to SED's findings, and SED's evaluation of SWG's response to the findings.

This letter serves as the official closure of the 2023 G.O. 112-F Inspection of SWG's DPP, PAP, and ERP programs.

If you have any questions, please contact Sann Naing, Senior Utilities Engineer (Specialist), at (213) 266-4723 or by email at [sn1@cpuc.ca.gov](mailto:sn1@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthewson Epuna".

Matthewson Epuna  
Program & Project Supervisor  
Gas Safety & Reliability Branch  
Safety and Enforcement Division

CC: Sann Naing, SED/GSRB  
Laurie Brown, SWG  
Terence Eng, SED/GSRB  
Claudia Almengor, SED/GSRB

# 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 emergency calls 24/7. SED recommends that SWG should include the stated information and the process in its written plan.

**SWG's 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.

**SED's Conclusion:**

SED has reviewed SWG's response and accepts SWG's explanation.

## **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 192.614(c)(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.

**SWG's 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.

**SED's Conclusion:**

SED accepts SWG's stated remedial action/plan and acknowledges that the proposed actions will promote data accuracy as well as meaningful analysis of data related to pipeline damage and the improvement of the operator's damage prevention program.