



# **SOUTHWEST GAS CORPORATION**

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

February 11, 2020

*Via Email and U.S. Mail*

Dennis Lee  
Program and Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
State of California Public Utilities Commission  
505 Van Ness Avenue, Suite 500  
San Francisco, CA 94102

**SUBJECT: Southwest Gas Response – Notice of Gas Incident Violation for Southwest Gas Corporation**

Dear Mr. Lee:

Southwest Gas Corporation (Southwest Gas or Company) respectfully submits the enclosed response to SED's Notice of Probable Violation (NOPV) letter dated January 14, 2020 for a non-DOT reportable incident at Chippewa Street/Iroquois Circle in South Lake Tahoe that occurred on September 28, 2018.

We appreciate Staff's consideration of the attached response to the probable violation and look forward to discussing any questions or concerns that you may have with the Company's response.

Sincerely,



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

cc: Brad Harris  
Kevin Lang  
Catherine Mazzeo

Valerie Ontiveroz  
Terence Eng (CPUC)  
Mohammad Ali (CPUC)



The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) submits the following Notice Of Probable Violations (NOPV) for non-DOT reportable incident investigations completed in the First (1st) Quarter of 2019.

**Title 49 Code of Federal Regulations (CFR) §192.605(b)(1) states in part:**

*“(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.”*

*“(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.”*

**List of Incident(s) with Probable Violation(s)**

PUC ID	Date	Address	Utility	Third Party Entity	Investigative Findings	Code Violation(s)
G20180928-2351	9/28/2018	Chippewa St./Iroquois Circle, South Lake Tahoe	SWG	NA	A SWG contractor performing a 2 inch Aldyl-A gas main replacement work on 9/28/2018 incorrectly thought that the mains were two-way fed and did not tie in to remaining one-way line resulting in an outage for 8 hours and affected 88 customers. SED found SWG in violation of 49 CFR §192.605(b)(1) for failure to follow SWG’s Main and Service Installation procedure as detailed in drawing # 16_3535360.	49 CFR §192.605(b)(1)

**Southwest Gas Response:**

Southwest Gas acknowledges that its contractor did not follow the Company’s Main and Service Installation procedure. This incident occurred during the installation of a new 2-inch PE main between [REDACTED] and the intersection of Chippewa and Pawnee. The new main was correctly installed but the contractor mistakenly assumed that the system was two-way fed and failed to contact the Company for flow verification prior to removing the bypass equipment. As such, the crew did not tie-in to the remaining one-way line, resulting in the under-pressure event and customer outage.

As the Company noted in its 30-day Follow-up Report (PHMSA Form 7100.1), two contractors and one Company employee were disqualified and retrained as a result of this incident. Further, in an effort to reduce the likelihood of future incidents of this nature, Southwest Gas reviewed its Operations Manual and developed a specific Pipeline Bypass Operations procedure. This new procedure was included in the Company’s September 2019 Operations Manual release. A copy is provided as Attachment 1 to this response.