

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 5, 2023

Mr. Jerry Schmitz, Vice President  
Southwest Gas Corporation  
P.O. Box 98510, LVA-581  
Las Vegas, NV 89193-8510

**SUBJECT: Closure letter for Notice of Probable Violations for Non-DOT Reportable incident (Non-DOT NOPV) issued during the First Quarter of 2023, Q1-2023.**

Dear Mr. Schmitz,

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) reviewed Southwest Gas Corporation's (SWG) response dated May 3, 2023, to address SED's Notice of Probable Violation Report sent to SWG on April 5, 2023. The Notice of Probable Violation Report is regarding an incident that occurred on December 11, 2021.

This letter serves as an official closure of the **Q1-2023 Non-DOT NOPV** letter for incident G20211213-3305 in Hesperia. If you have any questions, please contact Mohammad Ali at (916) 928-2109 or by email at ma5@cpuc.ca.gov.

Sincerely,

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

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

CC: Laurie Brown / SWG  
Mohammad Ali / SED-GSRB  
Terence Eng / SED-GSRB

## **SUMMARY OF INVESTIGATION FINDINGS**

**SED Findings: SED identified 3 probable violations as described below:**

**1. Title 49 Code of Federal Regulations, §192.605(a) states in part:**

*“(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.”*

**2. Title 49 Code of Federal Regulations, Part 192, §192.603(b) states in part:**

*“(b) Each operator shall keep records necessary to administer the procedures established under § 192.603.”*

**3. General Order 112-F, Subpart B – Reports, § 122.2(b)(2) states in part:**

*“(b) In the event of an incident listed in 122.2(a) above, an Operator shall go to the Commission’s website, select the link to the page for reporting emergencies and follow the instructions thereon. If internet access is unavailable, the Operator may report using the backup telephone system.*

*2. If the Operator is notified of the incident outside of its normal working hours, the report should be made as soon as practicable but no longer than 4 hours after the Operator is aware of the incident and its personnel are on the scene.”*

### **SED Investigative Findings:**

On December 11, 2021, at approximately 1220 hours, a Southwest Gas (SWG) service line was inadvertently isolated resulting in a service interruption. SED’s investigation found that the incident was caused by inaccurate mapping per SWG’s procedure, inadequate records which were provided to contractor crew, and an inadequate site review per SWG procedure. Furthermore, SWG failed to report the incident timely in accordance with General Order (GO) 112-F. Therefore, SED finds that SWG is in probable violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, §§192.603(b), 192.605(a), and GO 112-F, §122.2 (b)(2).

### **Southwest Gas Response:**

Southwest Gas acknowledges that its contractor received inadequate records. As discussed in the Company’s 30-day follow up report and data request responses, Southwest Gas discovered that the new service installation had not yet been posted to the Company’s Field Smart mapping system and the Division’s Energy Solutions personnel incorrectly mapped the proposed work by omitting symbology when generating the new service work order. These circumstances contributed to the exclusion of a service tie-over during the main replacement project. Southwest Gas further discovered that its contractor failed to compare documentation with electronic locates per the Company’s confirmatory line locate procedures.

In light of these identified issues, the Company performed several corrective actions to prevent or minimize the potential for recurrence. First, the Company disqualified three contract employees for the Locate Underground Pipeline task. These contract employees were requalified in January 2022. Next, the Division re-trained its Energy Solutions personnel on correctly mapping new business work requests to help ensure accurate placement of new project symbology in the Company's mapping system to alert users of the potential presence of newly installed facilities. Furthermore, the Division enhanced its pre-construction preparations process. In addition to the identified project, any new business or replaced/reinstated service lines within the project area are reviewed to verify installation status. Finally, the Division implemented a pre-construction job-walk as part of the Job Site Assessment process to ensure the crew has a high level of awareness of current job site conditions including potential discrepancies that may exist compared to the design drawings.

Southwest Gas acknowledges there was a delay in reporting the under-pressure event due to a training issue. As discussed in previous data request responses, the onsite Southwest Gas Inspector sent a text to his supervisor advising of the incident at the time of the event, Saturday, December 11, 2021. However, the supervisor was not on call that weekend and was not aware of the incident until the supervisor turned on his phone the following Monday morning. The supervisor immediately notified management of the unplanned outage, which led to an immediate investigation to confirm the details, resulting in a notification to the CPUC. As a follow up to this event, the Division provided training to appropriate Division personnel to ensure Company personnel contact the on-call supervisor after hours and on weekends.

**SED's Conclusion:**

Upon review of SWG's response, SED agrees that SWG performed several corrective actions by disqualifying contract employees, re-training Energy Solutions personnel, and enhancing pre-construction preparations process to prevent or minimize recurrence.