



SOUTHWEST GAS CORPORATION

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

May 2, 2023

Via Email

Mr. Matthewson Epuna
Program and Project Supervisor
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: Notice of Gas Incident Probable Violation for Southwest Gas Corporation in Q-1 2023

Dear Mr. Epuna,

Southwest Gas Corporation (Southwest Gas or Company) respectfully submits the enclosed response to your letter dated April 5, 2023. The Safety and Enforcement Division (SED) of the California Public Utilities Commission (Commission) set Notice of Probable Violations (NOPV) for non-DOT reportable incident investigations completed in the first quarter of 2023 (Q1-2023).

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: Sam Grandlienard
Vincent Vitatoo
Kevin Lang
Valerie Ontiveroz

Terence Eng, CPUC
Gordon Huang, CPUC
Mohammad Ali, CPUC



**SOUTHWEST GAS CORPORATION RESPONSE TO
NOTICE OF GAS INCIDENT PROBABLE VIOLATION FOR
NON-DOT REPORTABLE INVESTIGATIONS IN Q-1 2023**

Probable Violations

1. 17830 Bascom Street, Hesperia, San Bernardino County; **CPUC ID # G202112133146**

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 a 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 reoccurrence. 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.