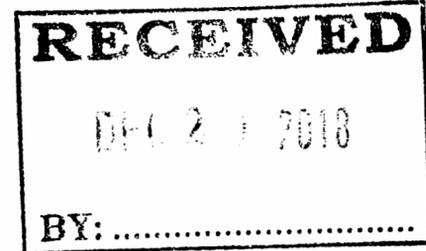




SOUTHWEST GAS CORPORATION



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

December 20, 2018

Ms. Kim West
Director, Western Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

RE: CPF 5-2018-1008W

Dear Ms. West:

Southwest Gas Transmission Company (SGTC or Company) is in receipt of your November 19, 2018 Warning Letter regarding a records review performed by the Arizona Corporation Commission (ACC) in April 2017, pursuant to Chapter 601 of 49 United States Code.

Your letter alleges one probable violation of 49 CFR 192.805, and states:

The ACC representative reviewed the OQ records and discovered that the Control Room Supervisor did not have the proper qualifications according to the procedures and covered task list. During discussions with Control Room personnel, it was disclosed that the Control Room Supervisors are not being OQ qualified on the covered tasks listed above. Based on this information, SGTC was not following its OQ Program.

SGTC acknowledges that the Covered Task list contained as Appendix D of its Operator Qualification (OQ) Plan at the time of the ACC Audit listed the same covered tasks for both the Control Room Supervisor as well as the Gas Control Technician job classifications. The Company's covered task list provides a list of activities that have been identified and approved by the Company as being covered tasks pursuant to 49 CFR Part 192.801(b). Although the Gas Control Supervisor job classification was listed as requiring the covered tasks of OQ-7700 SCADA OQ/Monitoring, OQ-7710 SCADA OQ/Starting, OQ-7720 SCADA OQ/Operating, OQ-7730 SCADA OQ/Shutting Down, OQ-7740 SCADA/Alarm Management, OQ-7750 SCADA OQ/Opening and Closing Valves, OQ-7760 SCADA OQ/AOC, and OQ-7770 SCADA OQ/Communications Plan for Manual Operations, the Gas Control Supervisor job classifications do not perform these covered tasks.

The Company's OQ Plan was revised in June 2017 to clarify that these covered tasks do not apply to the Gas Control Supervisor job classification. A copy of the Covered Task List for Gas Control, which reflects these revisions, is provided as **Attachment 1**.



Should you have any questions, please do not hesitate to contact me.

Sincerely,

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

Revised: 07/24/17															
LMS Item #	16657	17890	17891	16716	16717	16718	16719	16720	16721	16722	16723	16794	16795	16796	17277
Evaluation Method Initial: W=Written, O=Oral, P=Practical	P	P	P	W/O	W/O	W/O	W/O	W/O	W/O	W/O	W/O	P & W/O	P & W/O	P & W/O	P & W/O
Evaluation Method Subsequent	P	P	P	W/O	W/O	W/O	W/O	W/O	W/O	W/O	W/O	P & W/O	P & W/O	P & W/O	P & W/O
Span of Control	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1	1:1
Frequency	*1	*1	*1	5	5	5	5	5	5	5	5	5	5	5	5
	QQ-7611 Sure-Lock All Pro	QQ-7621 Subsite 830RT	QQ-7631 Subsite Accuvue	QQ-7700 SCADA OQ/Monitoring	QQ-7710 SCADA OQ/Starting	QQ-7720 SCADA OQ/Operating	QQ-7730 SCADA OQ/Shutting Down	QQ-7740 SCADA OQ/Alarm Management	QQ-7750 SCADA OQ/Opening & Closing Valves	QQ-7760 SCADA OQ/AOC	QQ-7770 SCADA OQ/Communication Plan for Manual Operation	QQ-8000 Station Bypassing	QQ-8011 Method II Station Bypassing	QQ-8021 M&C AOCs	QQ-8100 Odorizer Wick Type Odorizer Inspection, Testing, Preventative and Corrective Maint

Gas Controllers

Gas Control Technician				5	5	5	5	5	5	5	5				
Supervisor Gas Control															
Supervisor Instrument and Control															

NOTE:
Notations are explained on the last page