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December 3, 2024

Mr. Terence Eng, P.E.,  
Program Manager, Gas Safety and Reliability Branch,  
Safety and Enforcement Division,  
California Public Utilities Commission,  
505 Van Ness Ave, 2nd Floor  
San Francisco, CA 94102

Dear Mr. Eng:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a **General Order (G.O) 112-F inspection of Southern California Gas Company's (SoCalGas) Operator Qualification (OQ) Program** from September 9 through September 13, 2024. SED used the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety's "Inspection Assistant Form" as a reference guide to conduct the inspection. The inspection included a review of SoCalGas' Operator Qualification procedures and records from January 1, 2020, through December 31, 2023, and field inspections of training facility/classes at SoCalGas Base in Pico Rivera.

SED staff did not identify any probable violation of G.O. 112-F, Reference Title 49 CFR, Parts 192, but noted two (2) areas of concern.

Below is SoCalGas' written response.

Please contact Alex Hughes at (213) 671-1344 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Hughes", with a long horizontal flourish extending to the right.

Alex Hughes  
Pipeline Safety and Risk Mitigation Manager

CC:

Larry Andrews, SoCalGas  
Mahmoud Intably, GSRB  
Kan Wai Tong, GSRB  
Gordon Kuo, GSRB  
Claudia Almengor, GSRB

# 2024 SoCalGas Operator Qualification Program Audit Response

## Concerns:

### Training and Qualification : Operator Qualification (TQ.OQ)

#### 1. Question Title, ID Evaluation Methods, TQ.OQ.EVALMETHOD.P

Question 4. Are evaluation methods established and documented appropriate to each covered task?

References 192.805(b) (192.803, 192.809(d), 192.809(e))

Assets Covered Southern California Gas Operator Qualification (SoCalGas OQ)

Issue Summary Title 49, CFR Part 192, Section 192.805(b) states:

*"Ensure through evaluation that individuals performing covered tasks are qualified"*

Title 49, CFR Part 192, Section 192.803 states:

*"Evaluation means a process, established and documented by the operator, to determine an individual's ability to perform a covered task by any of the following:*

- (a) Written examination;*
- (b) Oral examination;*
- (c) Work performance history review;*
- (d) Observation during:*

- (1) Performance on the job,*
- (2) On the job training, or*
- (3) Simulations.*

- (e) Other forms of assessment."*

SoCalGas Gas Standard 167.0100 Operator Qualification Program, Section 3.8 states:

*"Evaluation: as applied to OQ program, a process established and documented by the Company, to Determine an individual 's knowledge, skill, and ability to perform a covered task. The evaluation must include at least one knowledge check and at least one performance check:*

#### *3.8.1 Knowledge Check:*

- Written examination (may be paper, electronic or web based), or*
- Oral examination (e.g. AOC oral/verbal exam).*

#### *3.8.2 Performance Skill Check:*

- Observation during on-the-job performance,*
- Observation during on-the-job training,*
- Observation during task simulation (e.g. using props or augmented reality),*  
*and*
- Other forms of assessment (e.g. Welder requalification per 49 CFR part 192 subpart E, API 1104 and Plastic Pipe Joiners must be evaluated in accordance with 49 CFR part 192 subpart F)."*

SED reviewed SoCalGas' Gas Standard 167.0100, Section 3.8.2 "Performance Skill Check" that requires an individual to be qualified under all the bullet points in "Performance Skill Check" due to the fact that SoCalGas is using "and" at the end of the third bullet point. SED reviewed SoCalGas' contractor ARB qualification records and found that the contractor was qualified under "Performance Skill Check". SED asked SoCalGas which one of the four bullet points under 3.8.2 this referred to. SoCalGas responded that the "and" stated in the third bullet point of the procedure refers to the aspect that this means the procedure required all bullet points under the "Performance Skill Check" to be done in order to meet Section 3.8.2

"Performance Skill Check" requirement. This contrasts earlier provided records of SoCalGas employees, who were shown in their records to have a single "Performance Skill Check" method done in their qualification records.

SED recommends SoCalGas to modify Section 3.8.2 to clarify that the "Performance Skill Check" does not require all the bullet points to be used to confirm an individual's qualification.

On October 14, 2024, SED received SoCalGas response stating that:

*"editorial changes have been made to Gas Standard 167.0100. In Sections 3.8.1 and 3.8.2, the word "and" has been replaced with an "or". With this new wording, the revised procedures state that only one knowledge and one performance check is required from many options."*

SED has reviewed SoCalGas' response and accepts the corrective actions that it has articulated and implemented. However, SED may review the effectiveness of SoCalGas' corrective actions during future inspections.

2. Question Title, ID Contractor Qualification, TQ.OQ.OQCONTRACTOR.R

Question 5. Are adequate records containing the required elements maintained for contractor personnel?

References 192.807(a) (192.807(b))

Assets Covered Southern California Gas Operator Qualification (SoCalGas OQ)

Issue Summary Title 49, CFR Part 192, Section 192.807(a)(4) states in part:

*"Each operator shall maintain records that demonstrate compliance with this subpart.*

*(a) Qualification records shall include:*

*(4) Qualification method(s)."*

SoCalGas Gas Standard 167.0100 Operator Qualification System, Section 3.8 states:

*"Evaluation: as applied to OQ program, a process established and documented by the Company, to Determine an individual 's knowledge, skill, and ability to perform a covered task. The evaluation must include at least one knowledge check and at least one performance Check:*

*3.8.1 Knowledge Check:*

- *Written examination (may be paper, electronic or web based), or*
- *Oral examination (e.g. AOC oral/verbal exam).*

*3.8.2 Performance Skill Check:*

- *Observation during on-the-job performance,*
- *Observation during on-the-job training,*
- *Observation during task simulation (e.g. using props or augmented reality), and*
- *Other forms of assessment (e.g. Welder requalification per 49 CFR part 192 subpart E, API 1104 and Plastic Pipe Joiners must be evaluated in accordance with 49 CFR part 192 subpart F)."*

SED reviewed SoCalGas' ARB contractor qualification records for employee ID# 203529. The qualification method for the covered task SCSD-01.04-0801 stated "knowledge/performance" and the qualification method for the covered tasks SCSD-01.07-1071 and 704 stated "oral exam/observation" without specifying which category of "knowledge/performance" and "oral exam/observation" the individual qualified under for the covered tasks. Therefore, SED found that the evaluation method and the qualification records to be inconsistent for the covered tasks. SED recommends SoCalGas to be specific to which "knowledge/performance" and "oral exam/observation" the individual qualified under to ensure consistency in qualification records documentation for the covered tasks.

On October 14, 2024, SoCalGas provided SED with an update stating that:

*"SoCalGas is working with their 3rd party vendor to determine the feasibility of modifying their platform to be more in line with SoCalGas's terminology, with an update being provided in December 2024."*

SED requests SoCalGas to provide SED with monthly updates until the integration of SoCalGas' terminology is implemented.

### **Response:**

SoCalGas has engaged our third-party vendor, Veriforce, to determine if they can provide the same granularity of qualification data that we have in our system of record (SAP). Veriforce has taken this request under consideration and will be working with SoCalGas to explore if the changes can be made; and if possible, when a target date can be achieved.