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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 San Diego Gas and Electric Company (SDG&E)'s Operator Qualification (OQ) Program** from September 16 through September 20, 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 SDGE's Operator Qualification procedures and records from January 1, 2020, through December 31, 2023, and field inspections of training facility/classes at SDG&E Base in Kearny Mesa.

SED staff did not identify any probable violation of G.O. 112-F, Reference Title 49 CFR, Parts 192, but noted one (1) areas of concern.

Below is SDG&E's 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", is written over a light blue grid background.

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 SDG&E Operator Qualification Program Audit Response

Concerns:

Training and Qualification : Operator Qualification (TQ.OQ)

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 San Diego Gas and Electric Operator Qualification (SDGE 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)."

SDG&E Gas Standard G8113 Operator Qualification System, Section 3.8 states:

"Evaluation: as applicable 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 a knowledge check and a performance skill check.

3.8.1. Knowledge Check:

3.8.1.1. Written examination (may be paper, electronic or web based)

3.8.1.2. Oral examination (e.g., AOC oral/verbal exam)

3.8.2. Performance Skill Check:

3.8.2.1. Observation during on-the-job performance.

3.8.2.2. Observation during on-the-job training.

3.8.2.3. Observation during task simulation (e.g., using props or augmented reality).

3.8.2.4. 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 SDG&E's contractor qualification records for Aegeus, EEI, Henkels, and Prime. The Qualification documentation of covered tasks use vague terms such as "observation & oral exam", "certificate & observation", "exam", and "knowledge/performance". "Observation" may refer to any of the observation methods under Section 3.8.2. "knowledge/performance" may refer to any of the knowledge methods under Section 3.8.1 and performance methods under Section 3.8.2. "Exam" may refer to any examination methods under Section 3.8.1. SED recommends SDG&E to be specific to which "knowledge/performance", "observation" and "oral exam/observation" the individual qualified under to ensure consistency in qualification records documentation for the covered tasks.

On October 14, 2024, SDG&E provided SED with an update stating that:

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

SED requests SDG&E to provide SED with monthly updates until the integration of SDG&E's terminology is implemented.

Response:

SDG&E 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 SDG&E to explore if the changes can be made; and if possible, when a target date can be achieved.