

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 4, 2024

GI-2024-09-SDGE-53-07

Mr. Rodger Schwecke
Senior Vice President and Chief Infrastructure Officer
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

Dear Mr. Schwecke:

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** on September 16 through 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 identified zero (0) probable violations of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, and noted one (1) area of concern which is described in the attached "Post-Inspection Written Preliminary Findings".

Please provide a written response within 30 days of your receipt of this letter indicating the measures taken by SDG&E to address the violation and concerns noted in the "Post-Inspection Written Preliminary Findings".

Thank you for your cooperation in this inspection. If you have any questions, please contact Gordon Kuo, Senior Utilities Engineer, at (213) 618-5263 or by email at gk2@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Terence Eng". The signature is fluid and cursive, written over a white background.

Terence Eng, P.E.
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

cc: See next page.

Alex Hughes, Pipeline Safety and Risk Mitigation Manager
Pipeline Safety and Compliance
Southern California Gas Company
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Senior Utilities Engineer
Gas Safety and Reliability Branch
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Claudia Almengor
Associate Governmental Program Analyst
Gas Safety and Reliability Branch
Safety and Enforcement Division

Post-Inspection Written Preliminary Findings

Dates of Inspection: 09/16/2024 - 09/20/2024

Operator: SAN DIEGO GAS & ELECTRIC CO

Operator ID: 18112 (primary)

Inspection Systems: GT & GD

Assets (Unit IDs) with results in this report: San Diego Gas and Electric Operator Qualification ()

System Type: GT & GD

Inspection Name: SDG&E Operator Qualification Program - 2024

Lead Inspector: Gordon Kuo

Operator Representative: Edwin Baires, Austin Walker, Sandie To

Unsatisfactory Results

No Preliminary Findings.

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.