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May 10, 2023

Mr. Terence Eng
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: General Order (GO) 112-F Gas Inspection of PG&E's Operator Qualification Program

Dear Mr. Eng:

Pacific Gas and Electric Company (PG&E) submits this response to the SED's inspection report stemming from the inspection of PG&E's Operator Qualification (OQ) Program. The inspection took place between January 23-27, 2023, and on February 21, 2023. On April 10, 2023, the SED submitted their inspection report and identified six (6) concerns; below is PG&E's response to the SED inspection report.

Please contact [REDACTED] for any questions you may have regarding this response.

Concerns 1 and 2: Training and Qualification: Operator Qualification (TQ.OQ)

Question Title, ID: Operator Qualification Plan and Covered Tasks, TQ.OQ.OQPLAN.P

Question: Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?

References: 192.805(a) (192.801(b))

Issue Summary 1:

(1) The title of Operation Qualification (OQ) tasks should be indicative of the scope of the work for which these are intended for, not a general title. For example, the title for OQ task, OQ-0103 is "Operations and Maintenance" The "Task Guidance" description is, "This task includes the inspection and repair of cast iron".

PG&E shall review, and also analyze any similar occurrences for all other OQ tasks and take remedial measures, as needed.

PG&E's Response: A review of the task list was completed in February 2023, and 50 OQ titles have been updated, which is reflected in Attachment 1.

Issue Summary 2:

(2) TD-4008S Rev 4d, section 2.4(5) states, "OQ manager may recognize and accept the qualifications of a contract company's qualification program if the program complies with all applicable provisions of 49 CFR §192, subpart N".

The statement above should also include California Public Utilities Commission's (CPUC) General Order 112-F.

PG&E's Response: We accept the recommendation to add GO-112F to section 2.4.5 of TD-4008S. The updated document was published on March 15, 2023, and becomes effective on June 1, 2023. TD-4008S Rev 4e is provided as Attachment 2.

Concern 3: Training and Qualification: Operator Qualification (TQ.OO)

Question Title, ID: Reevaluation Intervals for Covered Tasks, TQ.OO.REEVALINTERVAL.P

Question: Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?

References: 192.805(g)

Issue Summary 3:

PG&E changed reevaluation intervals from 3 years to 5 years for a number of OQ tasks. PG&E sent an update to CPUC through a letter dated 9/2/2020.

PG&E Standard TD-4008S Rev d section 2.3 (3) addresses the re-evaluation of employees for OQ tasks. During the inspection, PG&E explained that re-evaluation occurs on a quarterly basis. For example, if an individual was qualified for a covered task on February 20, 2019, and the task has a three-year re-evaluation interval, according to PG&E's current practice, he/she will have until the end of March 2022 to take re-qualification evaluation. This means the individual will be "un-qualified" from February 20, 2022, until he/she takes re-evaluation that can happen until March 31, 2022.

Therefore, PG&E shall make sure that re-qualification evaluation must be taken by the due date or if the quarterly system is used in PG&E; then in the quarter prior to the expiration date, i.e., in previous case by December 31, 2021.

PG&E's Response: PG&E updated the OQ expiration interval in 2021, changing it from the end of the year to the end of the quarter. Prior to the change, personnel had up to an additional year to requalify for a task. The update significantly reduced the duration of the requalification interval. In the example above, the individual who passed the OQ evaluation on February 20, 2019, was not "un-qualified" from February 20, 2022, through March 31, 2022. Rather, the individual's qualification is valid until March 31, 2022, which is the end of the quarter in year 3 and was therefore "qualified" until March 31, 2022.

Concerns 4 and 5: Training and Qualification: Operator Qualification (TQ.OO)

Question Title, ID: Reevaluation Intervals for Covered Tasks, TQ.OO.REEVALINTERVAL.P

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

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

Issue Summary 4:

(1) SED reviewed PG&E's Standard TD-4008S Rev 4d, Section 2.2(3) which states that there are two methods of evaluation; 'Written' and the 'Performance' which includes Observation by Simulation, Oral Evaluation, and Observation during on-the-job performance, not to be used as sole method of evaluation.

(a) During the inspection, SED noted that several current OQ tasks requiring hands-on skills have only 'written' assessment. Some examples are: OQ-0101, OQ-0102, OQ-0103, OQ-0206 and OQ-0212.

PG&E's Response: PG&E reviewed the OQ task examples identified by SED as well as the entire task list to confirm whether the method of evaluation for each task should be written, performance, or both. It was determined that for tasks with performance only evaluations, skills are best evaluated through only a performance exam. For tasks with written only evaluations, it was determined that skills are best evaluated through knowledge comprehension. The table below outlines PG&E's comments based on the review of

the five identified examples for which it was determined that a written assessment remain the only requirement.

OQ Code	Task Name	Comments
OQ-0101	Bell Joints and Spigot Seals	Gas Operations replaces cast iron if found not repaired. Not adding a Performance Exam (PE) component.
OQ-0102	Protect Cast Iron Pipeline	Gas Operations replaces cast iron if found not repaired. Not adding a PE component.
OQ-0103	Operations and Maintenance	Gas Operations replaces cast iron if found not repaired. Not adding a PE component.
OQ-0206	Abandon/Deactivate	Difficult to recreate hands on work for a PE.
OQ-0212	Install Pipe in Bore	Too difficult to simulate the task.

However, the review of the full task list resulted in five additional OQ tasks for which PG&E will be adding a written assessment to the task, resulting in the need for both written and performance evaluations.

OQ Code	Task Name
OQ-0201	Mechanical repairs - steel 60 psig or less
OQ-0209	Field Services (FS) Mechanical Repair
OQ-0306	Pipe-to-soil reads
OQ-2504	Install Large Commercial and Industrial Meters
OQ-2505	Large Meter: Maintenance

(b) In addition, for OQ-0210 (pipe squeezing steel 2" thru 8"), the task guidance states that the academy training is recommended but not mandatory. This also needs to be reviewed to determine the actual need. Therefore, PG&E should review all OQ tasks listed in the document "OQ task list-Guide to Qual_12_22-2022" (QG-4008) to determine appropriate method(s) of evaluation for each task i.e., 'written', 'performance', or 'both', and the justification should be included in the said document.

PG&E should also review the training needs for each task, as indicated for OQ-0210 in (b) above and for all other OQ tasks. The required training for each task should also be included in QG-4008 with the justification if no training is required.

PG&E’s Response: All of the current OQ tasks’ training requirements were assessed by the OQ team, and a training column was added to QG-4008. Information regarding OQs with mandatory pre-requisite training requirements can be found in the training column, which can be seen on page 1 of Attachment 3.

Issue Summary 5:

(2) On 6/13/22, PG&E informed the CPUC, via a letter, that it has changed its passing score for ‘written exam’ from 100% to 80%, however, the passing score for “performance” exam remains 100%. However, there is no PG&E standard/procedure that includes the passing scores. PG&E also apprised that if an individual who is taking OQ evaluation receives a passing score (80% or above for written exam), he/she is provided at least ten minutes to review the correct answers for missed or wrong answers. It was also mentioned that if the individual does not achieve a passing score, he/she can have a maximum of three attempts (including both written and performance, if applicable) to pass. If there are three failures, the individual has to wait 30 days before retesting. All of this information together with any other details should be formalized and documented in a PG&E procedure.

PG&E's Response: The OQ team reviewed and accepted the recommendation to include passing score information in the OQ program document, TD-4008S section 2.2.3, provided as Attachment 2. Information on allowable test attempts and the mandatory 30-day waiting period after the third failed attempt is already documented in the Utility Procedure, TD-4008P-03 section 2.2, provided as Attachment 4, and we have also added a reference to allowable attempts in TD-4008S. TD-4008P-03 Revision 2d was published on February 15, 2023, and became effective on May 1, 2023.

Concern 6: Training and Qualification: Qualification of Personnel – Specific Requirements (O and M Construction) (TQ.QUOMCONST)

Question Title, ID: Qualification of Personnel Making Joints in Plastic Pipelines, TQ.QUOMCONST.PLASTIC.P

Question: Does the process require personnel making joints in plastic pipelines be qualified?

References: 192.285(a) (192.285(d), 192.805(b), 192.285(c))

Issue Summary 6:

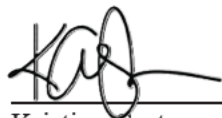
SED reviewed PG&E's D-34, "Qualifications for Joining Polyethylene Pipe" and QG-4008, "Guide to Operator Qualification," and found that the requalification requirement in these documents was written in a different way compared with 49 Code of Federal Regulations (CFR) 192.285©. In these PG&E documents, PG&E requires an individual to re-qualify every 15 months not exceeding 2 calendar years. However, 49 CFR 192.285(c) states that "A person must be re-qualified under an applicable procedure once each calendar year at intervals not exceeding 15 months, or after any production joint is found unacceptable by testing under §192.513."

According to PG&E, 49 CFR 192.285(c) was rewritten in these documents to clarify the plastic qualification interval from the perspective of when a person's current qualification would expire. Instead of saying an individual needs to be qualified every calendar year not to exceed 15 months, it was rephrased by PG&E to communicate their current qualification would expire after 15 months not exceeding the second calendar year.



SED is concerned that PG&E's current wording on the requalification requirement could be confused as the maximum interval being two calendar years or 24 months. To eliminate confusion, PG&E has updated its procedure to align more with the wording from 49 CFR 192.285(c), and the procedure is currently awaiting publishing approval. D-34 will be superseded by TD-4171S. QG-4008 will be updated once the procedure, TD-4171S, has been published.

PG&E's Response: PG&E has recently updated document D-34. As part of this update, we have revised the definition of PE connection qualification intervals to align with the regulatory code requirements as stipulated in 49 CFR 192.285(c). The document number for "Qualification for Joining PE pipe" has been updated from D-34 to TD-4171S. TD-4171S, provided as Attachment 5, was published on February 15, 2023, and became effective May 1, 2023.

Sincerely,



Kristina Castrence
Director, Gas Regulatory & Risk

Cc: Dennis Lee, SED
Claudia Almengor, SED
Sikandar Khatri, SED
 PG&E
 PG&E