

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 5, 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 (CPUC) reviewed San Diego Gas and Electric Company (SDG&E)'s response letter, dated December 3, 2024, that addressed zero (0) probable violations, and one (1) areas of concern identified during the **General Order (G.O.)112-F Inspection of San Diego Gas and Electric Company (SDG&E)'s Operator Qualification (OQ) Program**. Attached is a summary of SED's inspection findings, SDG&E's responses to SED's findings, and SED's evaluation of SDG&E's responses to the findings.

This letter serves as an official closure of the 2024 Inspection of San Diego Gas and Electric Company (SDG&E)'s Operator Qualification (OQ) Program. Any matters that are being considered for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

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](mailto:gk2@cpuc.ca.gov).

Sincerely,

Mahmoud Intably, PE  
Program and Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

cc: See next page.

Alex Hughes, Pipeline Safety and Risk Mitigation Manager  
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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.

**SDG&E's 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.

**SED's Conclusion:**

SED has reviewed SDG&E's response and SED requests SDG&E to provide monthly updates with a target completion date until the integration of SDG&E's terminology is implemented.