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April 13, 2017

Mr. Ken Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
320 W. Fourth Street, Suite 500  
Los Angeles, CA 90013

Dear Mr. Bruno:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F Inspection of Sempra Energy Utility's Operator Qualification Program Unit on August 22 through September 1, 2016. This inspection unit includes the Southern California Gas Company's (SoCalGas) and San Diego Gas and Electric Company's (SDG&E) operator qualification programs. The inspection included a review of the Inspection Unit's OQ program records for calendar years 2013 through 2015 and observed Sempra Energy Utility's employees performing covered tasks on pipeline facility at "Situation City" training facility in Pico Rivera, CA and at "Skill City" training facility in Mission Valley, CA. SED staff also conducted field observation of randomly selected individuals performing covered tasks.

SED staff made five recommendations. Attached are SoCalGas and SDG&E's written responses.

Please contact Troy A. Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,

Troy A. Bauer

CC: Mahmoud (Steve) Intably, SED/GSRB  
Matthewson Epuna, SED/GSRB  
Kan Wai Tong, SED/GSRB,

ATTACHMENTS

**ATTACHMENT 1**  
**Response to Probable Violation**

1. SCG's Gas Standard 167.0100 Operator Qualification Program and SDG&E's Gas Standard G8113 Operator Qualification Program, Appendix A "Covered Task List for Company Employees" addresses all the operation and maintenance activities that meets the "four part test" in §192.801(b). The OQ program is designed to ensure that all individuals working on Sempra Energy Utility's DOT-regulated pipeline facilities are OQ-qualified to perform specific covered tasks listed in Appendix A. Some of the covered tasks are complex in nature and describes broad area of expertise. SED recommends that Sempra Energy Utility should review industry practices to evaluate its Covered Tasks List and see if it is more beneficial to break up a covered task into sub-task groups or a create a separate new covered task in order to effectively assign evaluation requirements.

**RESPONSE:**

SoCalGas and SDG&E acknowledge this recommendation for the activities that meet the four-part criteria in §192.801(b). SoCalGas and SDG&E have identified covered tasks by comparing all work activities associated with the installation, construction, operations, and maintenance of natural gas facilities with the four-part criteria in §192.801(b). We will continue to review tasks in Appendix A using the guidance of B31Q to further evaluate tasks to determine if it's more beneficial to break up covered tasks into sub-tasks or create additional task.

2. SCG's Gas Standard 167.0100 and SDG&E's Gas Standard G8113, Appendix B, "Abnormal Operating Conditions" (AOCs), contain examples of generic AOCs that employees must be able to recognize and react. Some of the covered tasks listed in Sempra energy Utility Operation Qualification program only identified generic abnormal operating conditions (AOCs) but did not include provisions that identified task-specific AOCs for a specific covered task. FAQ 4.3 requires operators to identify both task-specific and generic AOCs. SED recommends that Sempra Energy Utility review and revise its procedure to include both task-specific and generic AOCs.

**RESPONSE:**

SoCalGas and SDG&E acknowledge this recommendation. SoCalGas and SDG&E are addressing task specific Abnormal Operator Conditions (AOCs) within our Operator Qualification content. SoCalGas and SDG&E will continue to review and develop this process.

3. SCG's Gas Procedure 167.0100 Appendix B "Abnormal Operating Conditions" (AOCs) provided examples of abnormal operating conditions that employees must recognize but it does not address the required reactions to the AOCs. SED recommends that Sempra Energy Utility review and revise its procedure to include the required reactions to the AOCs.

**RESPONSE:**

SoCalGas and SDG&E acknowledge this recommendation. SoCalGas and SDG&E require individuals, as part of each task's qualification criteria, to appropriately recognize and react to abnormal operating conditions (AOCs). We will continue to review and identify task specific AOC's, responses to those identified AOC's and remedial actions.

4. Sempra Energy Utility should keep appropriate documentation to justify or the basis for the re-qualification frequency/interval for each covered task. The appropriate documentation/ record must reflect the relevant factors including the complexity, criticality, and the frequency of performance of the covered task.

**RESPONSE:**

SoCalGas and SDG&E acknowledge this recommendation. We are currently reviewing a process for implementation.

5. SED reviewed Gas Standard 184.09 for the test ID: 22201-02-5.2 and identified deficiencies in the training module. The training module did not sufficiently address the standby process in accordance with the Gas Standard 184.09, Section 6. SED recommends that Sempra Energy Utility incorporate the standby process into the training module. In addition, Sempra Energy Utility should ensure that knowledge tests are consistent with Operation and Maintenance (O&M) procedure or operator practices.

**RESPONSE:**

SoCalGas and SDG&E acknowledge this recommendation. We are in the process of working with our training department to address this recommendation.