

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 15, 2021

GI-2020-09-SDGE-53-07

Mr. Rodger Schwecke, Senior Vice President
Gas Transmission, Storage & Engineering
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) conducted a **General Order (G.O.) 112-F Inspection of San Diego Gas and Electric Company (SDG&E)'s Operator Qualification (OQ) Program** on October 5 through 9, 2020 for calendar years 2016 through 2019.

SED conducted a remote review of SDG&E's OQ program procedures and records due to COVID-19 and California Governor Newsom's Executive Order N-33-20 shelter in place and social distancing guidelines ("Safer at Home, Stay at Home").

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 official closure of the 2020 GO 112-F Inspection of SDG&E's Operator Qualification Program.

Thank you for your cooperation in this inspection. If you have any questions, please contact James Zhang, at (415) 603-1310 or by email at JZ3@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Attachment

cc: See next page

Troy Bauer, Manager
Pipeline Safety and Compliance
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Associate Governmental Program Analyst
Safety and Enforcement Division

Post-Inspection Written Findings

Dates of Inspection: 10/05/2020 – 10/09/2020

Operator: SAN DIEGO GAS & ELECTRIC CO

Operator ID: 18112 (primary)

Inspection Systems: GT & GD

Assets (Unit IDs): San Diego Gas & Electric Operator Qualification ()

System Type: GT & GD

Inspection Name: 2020 San Diego Gas & Electric Operator Qualification

Lead Inspector: James Zhang

Operator Representative: Alex Hughes

Unsatisfactory Results

No Preliminary Findings.

Concerns

Training and Qualification : Operator Qualification (TQ.OQ)

Question Text Does the OQ plan require other entities that perform covered tasks on behalf of the operator to be qualified?

References 192.805(b) (192.805(c), 192.805(d), 192.805(e), 192.805(f))

Assets Covered San Diego Gas & Electric Operator Qualification (SDG&E OQ)

Issue Summary On October 8, 2020, SED and SDG&E discussed the review process for Assisting Parties (AP) standards used in the qualification of AP personnel. SDG&E stated that the review process would involve SDG&E's OQ Department to consult with subject matter experts (SMEs) in assessing the acceptability of AP standards. While the intent of this process is as written, the details of how this review process is not elaborated upon as written in Gas Standard G8113.

Of chief concern to SED is the matter of properly evaluating AP personnel with regards to SDG&E's benchmark for qualification. While AP personnel may have general knowledge, skills, and abilities

to be qualified through the AP's evaluation process, this does not automatically entail AP personnel as having been evaluated through SDG&E's process. For comparison, contractors are qualified through a training and evaluation process run by SDG&E's OQ vendor, Veriforce, as elaborated upon under G8113 § 4.7.5. AP personnel, on the other hand, are trained on SDG&E standards but not evaluated based on SDG&E evaluation process as written in G8113 § 3.8.

**SDG&E's
Response**

SDG&E has revised Gas Standard G8113, which includes added verbiage to section 4.8.1 9 (Mutual Assistance) stating, *"If the requirements in Section 4.8.1 are not met, the company will require evaluations for the Mutual Assistance employees to meet requirements of Section 4.1 within Gas Standard G8113."*

As stated in Section 4.1, training, as appropriate, is provided to the individuals performing covered tasks. Evaluation methods are used to evaluate an individual's knowledge, skills, and ability to perform the safe operation of pipeline facilities. The requirements of the knowledge and performance exams are identified.

An evaluator from SDG&E's Operator Qualification Department (SME) is identified as one with technical knowledge and capability to ascertain an individual's ability to perform a covered task as well as an individual's ability to recognize and react to abnormal operating conditions. The SDG&E's Operator Qualification subject matter experts (SMEs) will assess the acceptability of AP standards when Mutual Assistance is required.

**SED's
Conclusion**

SED has reviewed SDG&E's response and accepts the corrective actions that it has articulated and implemented. However, SED may review the records of the corrective action during future inspections.