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July 27, 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 audit of San Diego Gas and Electric Company's (SDG&E) Anti-Drug and Alcohol Misuse Prevention Programs from October 17 - 20, 2016. The audit included a review of SDG&E's records from calendar years 2013 through 2015. In addition, SED staff also inspected two contractor collection sites and observed specimen collections at SDG&E's Metro and Beach Cities bases.

SED staff identified one recommendation. Attached are 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:
Michelle Wei, SED/GSRB
Kan Wai Tong, SED/GSRB

ATTACHMENT

Summary of Inspection Findings
2016 SDG&E Anti-Drug and Alcohol Misuse Prevention Program Inspection
October 17-20, 2016

SED Recommendations

During the review of the Substance Abuse Professional (SAP) qualification records, SED noted that SDG&E did not maintain its own copy of the necessary documents to demonstrate that the SAP currently met all the requirements of 49 CFR Part 40, Section 40.281. SDG&E stated that if needed, it will request the needed documents from the SAP. However, SED recommends that SDG&E maintain a copy of the SAP's credentials, basic knowledge, qualification training, and continuing education on file.

RESPONSE:

Although the Substance Abuse Professional's (SAP's) refresher qualification training certificates were provided to the CPUC prior to the audit, and although 49 CFR Part 40, Section 40.281 pertains to the SAP and requires the SAP to be in compliance, SDG&E began to maintain a copy of all SAP credentials immediately after the audit, including but not limited to applicable licenses such as Marriage and Family Therapy (MFT) or Masters in Social Work (MSW). SDG&E will review annually to ensure a current copy of SAP's qualification training and continuing education is on file.