



Bill Gibson  
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March 16, 2012

Ms. Michelle Cooke, Director  
Consumer Protection and Safety Division  
California Public Utilities Commission  
505 Van Ness Avenue, Room 2005  
San Francisco, CA 94102-3298

Re: CPUC Resolution ALJ-274 Self-Identified Non-Compliance Notification  
Unqualified Employee Performing Service Repairs in Sacramento County

Dear Ms. Cooke:

Pursuant to Resolution ALJ-274, PG&E is providing notification of a self-identified non-compliance issue regarding an employee who used a valve changer while performing service valve repair work without being properly qualified or supervised.

On March 8, 2012, a PG&E Gas Distribution Supervisor's review of employee work records discovered that a Sacramento Division Gas Construction Fieldman performed 11 gas service valve repairs between February 4, 2012 and February 29, 2012 utilizing service valve changer equipment without being qualified per PG&E's Operator Qualification (OQ) Plan. The use of the service valve changer without proper training and qualification could result in an unintentional release of gas and possible employee injury.

Personnel performing maintenance or operations activities on gas facilities without proper qualifications is not in compliance with 49 CFR 192.805(b), which states, "*Each operator shall have and follow a written qualification program. The program shall include provisions to...Ensure through evaluation that individuals performing covered tasks are qualified.*"

As a result of the supervisor's discovery, qualified PG&E personnel inspected the 11 service locations where the unqualified Fieldman performed the service valve repair work. The gas facilities at these 11 locations were confirmed to be installed and sealed properly. In addition, PG&E confirmed that this employee has been trained, evaluated, and qualified for other repair tasks per PG&E's OQ Plan.

All gas department personnel are given annual refresher OQ training, which includes notification of what OQ sub-tasks the personnel are, and are not, qualified to perform. As a result of this discovery, the employee has received the list of sub-tasks that he is currently qualified for and has been reminded that he can only perform work that he is

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qualified for. The employee will be given training on the use of the service valve changer equipment, and upon the successful completion of the evaluation process, will be qualified for this sub-task per PG&E's OQ Plan.

PG&E will notify the local authorities for the City of Rancho Cordova and the County of Sacramento where the affected services are located and will provide confirmation of notification as a supplement to this letter.

Please contact Redacted for any additional questions you may have regarding this notification.

Sincerely,



Bill Gibson  
Director, Regulatory Compliance and Support

cc: Julie Halligan, CPUC  
Mike Robertson, CPUC  
Sunil Shori, CPUC  
Dennis Lee, CPUC

Redacted  
Shilpa Ramaiya, PG&E  
Frances Yee, PG&E