

**PACIFIC GAS AND ELECTRIC COMPANY
Gas Pipeline Safety OIR
Rulemaking 11 -02-019
Data Response**

PG&E Data Request No.:	LocalUnions246and342_001-01		
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Request Date:	August 5, 2011	Requester DR No.:	001
Date Sent:	August 11, 2011	Requesting Party:	Local Unions 246 and 342
PG&E Witness:	Todd Hogenson	Requester:	Jack Davis

SUBJECT: QUALITY CONTROL

QUESTION 1- PG&E IMPLEMENTATION PLAN

A. CONTRACTORS

1. Who will they be, how will they be chosen and how will they be pre-qualified?

B. WELDERS, JOURNEYMEN AND HELPERS ON GAS PIPELINE WORK

2. What will PG&E do to ascertain and confirm those workers' qualifications and abilities?
3. How will PG&E ensure that those workers have been properly trained?
 - 4.1 What are the qualifications PG&E requires of those workers?
 - 4.2 We would like to discuss PG&E's testing protocols and how they relate to pipeline-industry testing standards.

C. LABOR SUPPLY

5. What will PG&E do to obtain enough qualified gas pipeline welders, journeymen, helpers and other needed workers?

D. MATERIALS SPECIFICATIONS

6. What material specifications will PG&E prescribe to ensure pipeline integrity and safety?

7. What will PG&E do (or have contractors do) to ensure that the materials delivered conform to specifications and purchase orders?

ANSWER 1

A. CONTRACTORS

1. The IBEW Local 1245 and PG&E recognize that peak work is best accomplished through the use of hiring hall employees or contracting. For work to be accomplished under the Implementation Plan, the Company may contract work (1) when needed specialized skills or specialized equipment are not available and, (2) when peak workloads require a temporary increase in the Company's forces with subsequent lay-off of such additional forces.

All construction work normally and historically performed by the bargaining unit will be normally performed by a contractor signatory to an agreement with IBEW Local 1245 covering the work in question. The Company may contract work to a contractor who is signatory to a union other than IBEW Local 1245 or to a non-signatory contractor, if the effect of contracting does not dispense the services of employees who are engaged in maintenance, operating or construction work. All contractors will pay employees prevailing wage as defined by California Labor Code Part 7, Chapter 1, Article 2, Section 1770, 1773 and 1773.1.

The company will ensure that all individuals performing DOT OQ covered tasks will be in compliance with the Operator Qualification Rule. All contracts will state this requirement. A review of all contractors' operator qualification plans will occur along with spot checks for compliance at random job sites.

B. WELDERS, JOURNEYMEN AND HELPERS ON GAS PIPELINEWORK

2. All welding is performed in accordance with 49 CFR Part 192 operator qualifications, API Standard 1104, and PG&E Gas Standards. All welders must pass the PG&E welding qualification testing (with annual re-testing) to maintain welding certifications for the PG&E system.

Federal regulations require all pipeline operators, including PG&E, to develop and maintain a written qualification program for individuals performing any activity on a pipeline performed as a requirement of the code of federal regulations that affects the operation or integrity of the pipeline. This ensures a qualified workforce reducing the probability and consequence of incidents caused by human error. PG&E is responsible for all individuals working on its pipeline systems, including PG&E employees, International Brotherhood of Electrical Workers (IBEW) union hiring hall, and contract personnel. PG&E uses a written test and performance-based evaluations when qualifying personnel for its operator qualification program.

3. PG&E requires contractors and subcontractors to provide copies of the below listed documents to verify qualifications under both the DOT Operator Qualification Rule and PG&E's DOT Operator Qualification Plan.

- Contractor's and/or subcontractor's Qualification Plan
- A certification of compliance with DOT Operator Qualification Guidelines (dated and signed)
- Certifications of performance based testing

Pacific Gas & Electric Company may also require all or any of the following:

- Require contractor and subcontractor personnel to qualify Company's Plan
- Require only lead personnel be qualified, or the entire crew be qualified, and
- Copy of qualification documents (Written and/or Performance Based)

All contract work is inspected by a 3rd party or PG&E knowledgeable pipeline inspector in the areas of work being conducted by Contractor to monitor & maintain OQ records until job completion.

- 4.1 All gas transmission maintenance, construction, and operations positions need to maintain OQ or be directly observed by a qualified employee to perform any covered task on the PG&E gas transmission system.
- 4.2 PG&E's testing protocols for welders relate to pipeline-industry testing standards as follows. Per the CFR part 192, operators qualify welders in accordance with API 1104 or ASME Section IX. API 1104 is the industry standard for liquid or gas petroleum piping. PG&E welder qualification tests are conducted in accordance to API 1104 section 6.3 on 12.750" pipe for the PG&E previously qualified cellulosic electrode and low hydrogen electrode welding processes. PG&E can qualify a welder in accordance with API 1104 section 6.2 for a single qualification test, if the welder is only making single weld types.

C. LABOR SUPPLY

5. PG&E has an active program with community colleges which have a welding education program that is providing job opportunities for 1 to 20 apprentice welders per graduating class for the last few years. In addition to this, PG&E has internal opportunities for increasing head count of experienced journeyman welders. PG&E is also using its existing pipeline contractor's to supply supplemental welders for PG&E construction crews or contract construction crews.

D. MATERIALS SPECIFICATIONS

6. All materials are manufactured, tested, shipped, and inspected in accordance with API Standard 5L, PG&E Gas Standards, and 49 CFR Part 192.
7. All materials for gas construction use are purchased and supplied by PG&E for PG&E or contracted construction crews. All material transfers to a contractor are inspected by a materials lead person or inspector to ensure the contractor takes receipt of the correct material in good condition.