

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

PG&E Data Request No.:	LocalUnions246-342_002-04		
PG&E File Name:	GasPipelineSafetyOIR_DR_LocalUnions246-342_002-Q04		
Request Date:	January 3, 2012	Requester DR No.:	002
Date Sent:	January 17, 2012	Requesting Party:	Plumbers/Pipe Fitters/Steamfitters Local Unions 246/342
PG&E Responder:	Redacted	Requester:	Sarah Grossman-Swenson

QUESTION 4

Please provide all documents that constitute, report or describe PG&E's "written qualification program for persons administering welding tests performing any and all activities on a [PG&E] pipeline that affects the operation or integrity of the pipeline" referred to in PG&E's Answer 1.B.2, dated August 11, 2011, to U.A. Locals 246 and 342's Data Request of August 5, 2011.

ANSWER 4

As per the agreement reached by counsel during a telephone conference on January 5, 2012, PG&E will provide the applicable operator qualification document in response to this request. PG&E is not obligated to provide other documents that "report or describe" the qualifications.

There is no Operator Qualification for administering weld testing as testing welders falls under 49 CFR 192 Subpart E, not Subpart N (for which Operator Qualifications are required). Weld testing for company employees and contractors are administered by an internal centralized work group. Individuals administering weld tests are, or have been, qualified welders per API 1104 and possess the skills required based on training, education, experience, and in some cases examination such as American Welding Society (AWS), Certified Welding Inspector (CWI).