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January 29, 2014

Brigadier General Jack Hagan, Director
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue, Room 2005
San Francisco, CA 94102-3298

Re: Significant Modifications to PG&E's Operator Qualification Program

Dear Brigadier General Hagan:

Per Title 49 Code of Federal Regulations (CFR) §192.805(i), PG&E is notifying the Safety and Enforcement Division (SED) of significant modifications to the Company's Operator Qualification (OQ) Program.

Effective January 1, 2014, the improvements to PG&E's OQ Program include:

- Replacement of Utility Standard S4450 and PG&E's OQ Basic Plan with Utility Standard TD-4008S and six supporting utility procedures. The new standard and procedures are included as attachments to this notification.
- Reduction in the subsequent OQ evaluation interval from five years to three years.
- Defined the span of control as a maximum of 1:1. This requires assignment of not more than one unqualified person to be directed and observed by a qualified person performing a covered task.
- Retained a 3rd-party compliance evaluator to conduct contractor evaluations and document management.
- Expansion of qualifications for pressure testing:
 - Leak testing facilities at operating pressure
 - Pressure testing facilities that will operate below 100 psig (leak testing)
 - Pressure testing facilities that will operate at or above 100 psig (strength testing)
- Consolidation of the pipeline patrolling qualification into one task for both transmission and distribution pipeline patrols.
- Elimination of one leak survey task and addition of another due to changes in leak survey equipment utilized.
- Expansion of the list of covered tasks to include two new emergency response OQs specific to main line valves.
 - Automated main line valve emergency response
 - Distribution main line valve immediate response

The following modifications are now underway and will continue to be worked on throughout 2014:

- Assurance that evaluation methods include Abnormal Operating Condition (AOC) recognition and reaction.
- Creation of a new process for providing scripted performance evaluations. These scripts are being developed specific to each Record of Evaluation. The scripts consist of questions for the evaluator to ask, and acceptable answers that the individual being evaluated needs to convey for each performance criteria. This will add consistency to performance-based evaluations.

Please contact [Redacted] at [Redacted] or [Redacted] for any additional questions you may have regarding this notification.

Sincerely,

/S/
Bill Gibson
Director, Codes and Standards

cc: Dennis Lee, CPUC
Liza Malashenko, CPUC
Mike Robertson, CPUC

[Redacted]
Laura Doll, PG&E
Shilpa Ramaiya, PG&E
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Attachments