

1.1 Introduction

1.1.1 Purpose and Objectives

The PG&E Gas Operator Qualification Plan outlines the company's responsibilities and procedures to ensure that it has a qualified workforce and that its operations comply with relevant Federal Pipeline Safety Regulations.

In compliance with Sections 106 and 205 of the Pipeline Safety Act of 1992 and Section Four of the Accountable Pipeline Safety and Partnership Act of 1996, the U.S. Department of Transportation (DOT) through its Research and Special Programs Administration (RSPA) adopted regulations requiring that all individuals who operate and maintain pipeline facilities:

- be qualified to operate and maintain the pipeline facilities, and
- have the ability to recognize and react appropriately to abnormal operating conditions that may indicate a dangerous situation or a condition exceeding design limits.

These regulations are in Title 49 Code of Federal Regulations (CFR) Part 192 Subpart N.

To ensure its compliance with these regulations, PG&E has adopted this DOT Gas Operator Qualification Plan (referred to as the plan). The company will make its employees and other individuals who may perform tasks covered under the regulations set forth in 49 CFR Part 192 Subpart N aware of the regulatory requirements and the contents of this plan. This plan and its exhibits identify relevant operating and maintenance tasks (covered tasks), provide guidance for achieving compliance with the requirements of 49 CFR Part 192 Subpart N, and establish qualification methods for performing covered tasks on a gas pipeline facility.

1.1.2 Definitions

Abnormal Operating Condition: a condition identified by the operator that may indicate a malfunction of a component or a deviation from normal operations that may indicate an operating condition that could exceed design limits or result in hazard(s) to persons, property, or the environment.

Covered Task: a task that is:

- performed on a pipeline facility;
- an operations or maintenance task; on a pipeline facility;
- performed pursuant to a requirement in 49 CFR Part 192 or Part 195; and
- affects the operation or integrity of the pipeline.

CFS: Customer *Field* Service.

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Incident: any of the following events as defined in 49 CFR Part 191.3:

1. An event that involves a release of gas from a pipeline or of liquefied natural gas or gas from an LNG facility and
 - (i) a death, or personal injury necessitating in-patient hospitalization; or
 - (ii) estimated property damage including cost of gas lost, of the operator or others, or both, of \$50,000 or more.
2. An event that results in an emergency shutdown of an LNG facility.
3. An event that is significant, in the judgment of the operator, even though it did not meet the criteria of paragraphs (1) or (2).

Individual: an employee of PG&E or of an affiliated or unaffiliated entity who, on behalf of the company, performs one or more covered tasks.

LGOQPC: Local Gas Operator Qualification Plan Coordinator.

Local Operating Department (for M&C): a division or multiple divisions within a service area.

Local Operating Department (for CFS): an area or multiple areas within a service area.

M&C: Maintenance, and Construction.

Operator: owner of gas pipeline facilities, e.g., Pacific Gas and Electric Company.

Pipeline Facility: all parts of those physical facilities, owned and operated by the company, through which gas moves in the course of transportation, including distribution, transmission, and gathering lines.

Qualified Individual: a worker who has been evaluated and is able to properly perform a covered task(s), and recognize and react to abnormal operating conditions that may be encountered during the performance of the covered task(s).

SGOQPC: System Gas Operator Qualification Plan Coordinator. (Individual will be an employee in UO Engineering and Planning or PG&E Learning Academy.)

Task: series of actions leading to a meaningful outcome.

Subtask: series of steps (activities) that by themselves does not lead to a meaningful outcome.

UO: Utility Operations.

SIG: System Integrity Group

CGPC: Company Gas Plan Coordinator

LGEPCC: Local Gas Emergency Plan Coordinator

1.1.3 Covered Tasks

PG&E conducted a job task analysis of activities performed on its pipeline facilities. A four-part test (set forth in 49 CFR Part 192.801) was used for each of the identified activities to determine which activities were covered tasks.

1. Is the task performed on a pipeline facility?
2. Is the task an operations or maintenance task?
3. Is the task performed as a requirement of 49 CFR Part 192?
4. Does the task affect the operation or integrity of the pipeline?

If all four answers to the above questions were YES, then the activity is a covered task.

A list of covered tasks is available in Part IV of this plan.

1.1.4 Plan Requirements

Each operator shall have and follow a written qualification plan. The plan shall:

- a) identify covered tasks
 - b) ensure that individuals performing covered tasks are qualified
 - c) ensure that non-qualified individuals performing a covered task are supervised by a qualified individual
 - d) include a process to determine if an individual's performance contributed to an incident as defined in 49 CFR Part 191 and Utility Operations Standard S0355
 - e) include a process to evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task
 - f) communicate changes that affect covered tasks to individuals performing those tasks
 - g) identify those covered tasks and the required intervals for qualification
 - h) identify record keeping requirements necessary for compliance
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1.1.5 Qualification Plan Milestone Dates

- Work performance history review may be used as a sole evaluation method for qualification of individuals who were performing a covered task on a regular basis prior to August 27, 1999.
 - The Operator Qualification Rule effective date is October 26, 1999.
 - Each operator must have a written qualification plan in place by April 27, 2001.
 - Each operator must have completed covered task qualifications by October 28, 2002.
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1.1.6 Scope of Plan

The scope of the gas operator qualification plan applies to Utility Operations and HR Learning Services.

1.1.7 Plan Distribution

The holders of the PG&E Gas Operator Qualification Plan include:

- VP–*Energy Delivery*
 - VP– *Gas Transmission & Distribution*
 - VP–*Engineering & Planning*
 - VP–*Customer Field Service*
 - VP–*Human Resource*
 - Directors for Area OM&C, Gas Distribution & Technical Services, Gas System Maintenance & Technical Support, Gas System Operations, Gas Engineering & Planning, Customer Service–Field Service Delivery
 - *PG&E Learning Academy* Manager–Transmission & Distribution Delivery, Team Lead–Gas Transmission & Distribution
 - System Gas Operator Qualification Plan Coordinator (SGOQPC)
 - Local Gas Operator Qualification Plan Coordinators (LGOQPC)
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1.1.8 Plan Development and Updates

This section defines the departments and individuals responsible for the Gas Operator Qualification Plan and its maintenance and updates. (Reference Sections 1.7 and 1.8)

1.1.9 General Office Responsibility

Vice President–*Energy Delivery*, Vice President–*Gas Transmission & Distribution*, and Vice President–*Customer Field Service* are charged with the authority and responsibility for the gas operator qualification plan and with the qualifying and training of gas personnel performing covered tasks on pipeline facilities.

Vice President–*Engineering and Planning* is charged with the authority and responsibility of developing the PG&E Gas Operator Qualification Plan.

Vice President–*Human Resources* is charged with the authority and responsibility of developing and maintaining the PG&E Gas Operator Qualification Plan database and ensuring that appropriate training is developed for maintaining qualifications under the Operator Qualification Plan.

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Director—Gas Distribution & Technical Services appoints a company System Gas Operator Qualification Plan Coordinator.

SGOQPC maintains the PG&E Gas Operator Qualification Plan and its policies on a company level. The SGOQPC responsibilities include:

- reviewing the plan periodically and update it as needed
- providing coordination between the LGOQPCs and the CGPC
- providing system status reports
- ensuring proper documentation is recorded in database(s)

1.1.10 Local Responsibility

Directors for Area M&C, Field Service Delivery, Customer Field Service, Gas System Maintenance & Technical Support, and Gas System Operations are responsible for the qualification and training of gas employees performing covered tasks on pipeline facilities in their organizations. They will contact HR Learning Services for qualifying, re-qualifying, and training individuals to maintain sufficient qualified individuals to perform covered tasks on pipeline facilities. They will appoint a Local Gas Operator Qualification Plan Coordinator(s) (LGOQPC) to maintain the plan in their local operating department(s).

Appointment of the LGOQPC(s) is to be documented in Part V of the plan's reference documents.

Local Gas Operator Qualification Plan Coordinator is responsible for:

- developing the local operator qualification plan
- monitoring the plan implementation and progress
- maintaining the local aspects of the plan and its appendices
- adding and/or removing personnel from the covered tasks list
- continually reviewing and updating the local plan as changes dictate
- ensuring coordination with *PG&E Learning Academy* or their respective functional departments for qualifying, re-qualifying, and training of personnel within the particular area
- reporting results to the SGOQPC
- submitting documentation to *PG&E Learning Academy* for entry into the appropriate database
- maintaining copies of the qualifications
- coordinating qualification activities between supervisors
- coordinate activities with the LGEPC (Emergency 212 Call-Out List)

All employees are responsible for knowing and understanding the gas operator qualification plan. All employees are also responsible for performing without supervision *only* those covered tasks for which they have been qualified under this plan. Refer to section 1.4 of the plan for non-qualified individuals.

It is also the employee's responsibility to know which tasks they are, *and are not*, qualified to perform.

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All employees (including hiring hall) are also responsible for communicating to local supervision any significant changes that affect covered tasks they are assigned to perform.

All department managers/superintendents/supervisors share the responsibility to ensure that the skill evaluations have been completed for the employees with gas covered task responsibilities in their areas and that the evaluations were properly documented. The department managers/superintendents/supervisors are also responsible for developing any skill deficiencies found during the gas operator qualification evaluation(s).

1.1.11 Audit Schedule and Responsibility

The System Gas Operator Qualification Program Coordinator will maintain a list of all Local Gas Operator Qualification Plan Coordinators. The SGOQPC will audit the LGOQPC annually, or more often if needed, to verify all copies of the plan are up to date and to initiate changes if any copies are not up to date.

The annual audit shall be documented. The LGOQPC must notify the director responsible for the plan when the annual review is completed. The report shall include audit findings and an action plan to correct any deficiencies.

1.1.12 Annual Review and Responsibility

The Local Gas Operator Qualification Plan Coordinator/Local Supervision will at a minimum annually review the list of covered tasks and subtasks with covered and non-covered employees. The annual review shall be documented on an original signed roster and mailed to:

- *PG&E Learning Academy* care of [REDACTED] Room B101, 3301 Crow Canyon Rd., San Ramon, CA.

The annual review may occur in conjunction with tailboards, gas emergency training or any other forms of group communication.

1.1.12.1 Appendix

- Gas OQ Annual Review Job Aid

This Appendix can be found in Part V – Reference Documents

1.1.13 Mutual Assistance Agreements and Memorandums of Understanding

Local agreements that may impact gas operator qualification requirements of this plan are located in Part 1, Basic Plan 2.6 of the Company Gas Emergency Plan.

1.1.13.1 External Utilities

PG&E has established mutual assistance agreements with other utility companies. These agreements are maintained by the Distribution Operations Department and implemented through the Operations Control Center (see section 3.2.3 of the Company Gas Emergency Plan).

Local operating departments may have local agreements with utilities in their area. Include such agreements in Part 1, Basic Plan 2.6 of the Company Gas Emergency Plan. If mutual assistance is needed for the performance of a covered task, local operating departments must ensure that personnel are qualified to perform the identified covered task(s).

1.1.13.2 Mutual Assistance

Local operating departments that have arrangements with local government and emergency response agencies for mutual aid during gas emergencies should document those agreements. Include any such agreements in Part 1, Basic Plan 2.6 of the Company Gas Emergency Plan.

1.1.13.3 Mergers & Acquisitions

If applicable, PG&E will follow procedures and options outlined in Part I, Section 1.9 of the OQ Basic Plan regarding evaluations and qualifications of individuals.

1.1.14 Plan Appendices (Part IV)

Covered Tasks Identification Process

Utility OQ Tasks and Subtasks List

Covered Subtask Identification Process

List of OQ Plan Holders and Coordinators

Annual Review Roster (Intranet)

OQ Contractors Requirements

Contractors Flow Chart

Covered Task Change Review

Covered Task Addition Review

Gas OQ Justification Process

Gas OQ Annual Review Job Aid

Established Interval Chart

1.2 Evaluation and Qualification Process

1.2.1 Qualification Evaluation

Skill levels for employees involved in performing covered tasks on pipeline facilities must be assessed per the operator qualification performance evaluation outlined in Part II of this plan.

The LGOQPC shall include the location and custodian of individual skill and development evaluations in Part V of the plan's reference documents.

1.2.2 Operator Qualification Frequency

Any employee whose job requires that they perform covered tasks on pipelines must be re-qualified as outlined in Part II of this plan. The qualification evaluation may be completed in one or more field visits. *PG&E Learning Academy* and/or the appropriate functional department will conduct the qualification evaluation.

1.2.2.1 Appendix

- Gas OQ Justification Process

This Appendix can be found in Part V – Reference Documents

1.2.3 Evaluation of Qualifications

An individual's qualification to perform a covered task will be evaluated using one or more of the evaluation methods identified in this plan.

1.2.4 Evaluator Criteria

Using the Operator Qualification Job Performance Forms, the evaluator must be able to assess the knowledge and skill level of the participant who will be performing covered tasks on gas pipeline facilities. Only designated personnel from the local operating department, appropriate functional departments, and/or *PG&E Learning Academy* will evaluate personnel under the PG&E Gas Operator Qualification Plan.

Note

The Operator Qualification Rule does not require that the evaluator be qualified to perform the covered task. He or she, through knowledge or experience, must only be able to.

- ascertain participant's ability to perform a covered task, and
- substantiate an individual's ability to recognize and react appropriately to abnormal operating conditions that might occur while performing the task.

1.2.5 Evaluation Methods

Evaluation is defined as a process, established and documented by the operator, to determine an individual's ability to perform a covered task. Evaluation methods and qualification criteria applied to a covered task will vary from task to task and classification to classification. The evaluation method chosen for any specific covered task will include one or more of the following:

1. written examination
 2. oral examination
 3. work performance history review (transitional only)
 4. observation during:
 - (a) performance on the job
 - (b) on-the-job training
 - (c) simulation
 5. other forms of assessment (audits, skill blocks, etc.)
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1.2.6 Evaluation Interval Criteria

The criteria below are applied to each covered task and classification to determine the appropriate evaluation frequency for that task.

1. repetitive nature
2. level of risk
3. complexity
4. existence of checks and balances, such as:
 - (a) checklists; written plans
 - (b) follow-up actions
 - (c) audits
 - (d) job aids
5. regulatory requirements
6. Gas Standards and Specification materials
7. written materials
8. work performance history
9. observation during:
 - (a) performance on the job
 - (b) simulation
 - (c) other form
10. OJT support

1.2.6.1 Established Intervals

Re-qualification intervals for all covered tasks shall not exceed five (5) years for each covered task. (Chart can be found in Part IV – Plan Appendices.)

1.3 Qualification Categories

1.3.1 Transitional Qualification (*NO LONGER APPLICABLE*)

The transitional qualification is qualification of individuals who performed one or more covered tasks on a regular basis prior to August 27, 1999. For those individuals who did not perform the tasks, refer to section 2.1.2.

1.3.1.1 Transitional Period

The transition period for the company is April 1, 2001 to October 28, 2002.

1.3.1.2 Method of Qualification Evaluation

Work Performance History Review (WPHR) may be used as the primary evaluation method *only* during the transitional period of qualification. The Alternate Method may be used to supplement the WPHR or as a stand-alone qualification method, refer to Part III, Transitional Qualification. (See section 1.9 for contractors' requirements.)

1.3.1.3 Failure to Qualify

Should an employee not qualify under the transitional qualification requirements above, he or she will be given an opportunity to obtain the appropriate knowledge and skill through:

- formal training by *PG&E Learning Academy*
- structured on-the-job training (OJT) designed by *PG&E Learning Academy*
- OJT mentoring by a qualified person

Upon successful completion of one or more of the knowledge/skill building tools listed above, the individual will re-qualify using performance-based qualification methods the same as an initial qualification (see next section).

An individual shall be given three opportunities to qualify/re-qualify with a maximum 30-day interval between each attempt.

1.3.2 Initial Qualification

Initial qualification is the qualification of individuals who did not perform a particular covered task on a regular basis prior to August 27, 1999.

1.3.2.1 Method of Qualification Evaluation

Performance-based qualification evaluation is used for the initial qualification. *PG&E Learning Academy* will provide the appropriate testing document for qualifications under this requirement.

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1.4 Non-Qualified Individuals

1.4.1 When Non-Qualified Individuals May Perform a Covered Task

The company permits non-qualified individuals to perform covered tasks under certain circumstances, including but not limited to, the non-qualified individual's participation in on-the-job training or when working as part of a crew. *However, under any circumstances, all of the following conditions must be met:*

- A qualified individual is assigned to direct and observe non-qualified individual(s) during the performance of a covered task.
 - A qualified individual is able to take immediate corrective actions when necessary.
 - The ratio of non-qualified individuals to a qualified individual is kept to a minimum. (For ratios, use existing crew structures per Company/Union Labor Agreement.)
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1.5 Contributing to an Incident

1.5.1 Performance Contributing to an Incident

If there is reason to believe that an individual's performance of a covered task contributed to an incident, as defined under 49 CFR Part 191 (as amended) and Utility Operations Standard *S4413*, local supervision will initiate an investigation of that individual's qualification to perform that covered task with assistance from *PG&E Learning Academy* and/or the appropriate functional department as needed.

1.5.2 Determining if an Individual Needs to be Evaluated

In accordance with company policy and procedures, an investigation will be initiated for any incident defined by this plan. If in the course of that investigation the company concludes that there is reason to believe that the individual's performance of the covered task contributed to the incident, that individual's qualification to perform that covered task will be evaluated. The evaluator(s) will evaluate the individual in accordance with this gas operator qualification plan.

The Safety, Health and Claims (SH&C) intranet site has procedures and a form available to assist with conducting the investigation and performing root cause analysis. Refer to SH&C 202 "Incident Notification, Investigation, and Analysis Procedure."

1.6 Verification of Qualified Individuals

1.6.1 Reasonable Cause to Verify Qualification

Local supervision, *PG&E Learning Academy*, and/or the appropriate functional department will evaluate an individual if there is reason to believe that he or she is no longer qualified to perform a covered task. Concerns regarding an individual's ability to perform a covered task may be prompted by a number of circumstances and reported to local supervision, *PG&E Learning Academy*, and/or the appropriate functional department by any person.

1.6.2 Possible Reasons to Verify an Individual's Qualification(s)

- loss of motor skills, vision, impairment, etc.
 - physical impairment that prevents the individual from performing covered tasks with reasonable accommodation as required by the American's With Disabilities Act
 - statement from the employee
 - prolonged period of non-performance of the covered tasks
 - unsatisfactory performance
 - complaints received
 - fitness for duty concerns
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1.6.3 Determining if an Individual Needs to be Evaluated

Local supervision will initiate an investigation of an individual's qualification to perform a covered task with assistance from *PG&E Learning Academy* and/or the appropriate functional department as needed. The purpose of initiating an investigation is to determine if reasonable cause exists to evaluate an individual's qualification to perform the covered task(s) in question.

If the investigation findings show there is reason to believe an individual is no longer qualified to perform a covered task, that individual's performance of that covered task will be evaluated. The investigation findings shall be documented and distributed to local supervision, *PG&E Learning Academy*, and/or the appropriate functional department for further action.

1.6.4 Removal of Qualification

The qualification of an individual will be removed from the Training Server database and off the Covered Task List for such items as:

- employee is no longer qualified
 - individual is no longer assigned to perform the covered task (promotion, temporary assignment, leave of absence, etc.)
 - removal for other reasons
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1.6.5 Reinstatement of Qualification

The qualification of an individual may be reinstated under the following conditions:

1. when an employee returns to a classification requiring him or her to perform a covered task, and
 2. the individual's ability to perform the covered task has been evaluated consistent with the evaluation process outlined in this plan.
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1.7 Covered Task Changes

1.7.1 Communicate Changes

Gas Distribution & Technical Services will be responsible for communicating any changes to a covered task to the directors, managers/superintendents/supervisors, *PG&E Learning Academy*, and other functional departments.

Directors, managers/superintendents/supervisors, *PG&E Learning Academy*, and other functional departments will communicate such changes to the individuals who perform that covered task.

A change may be significant enough to require changes to the qualification process or additional evaluations of the individual. These changes may include but are not limited to:

- modifications to company policies or procedures
- changes in state or federal regulations
- use of new equipment and/or technology
- new information from equipment or product provider

1.7.1.1 Appendices

- Covered Task Change Review
- Covered Task Addition Review

These Appendices can be found in Part V – Reference Documents

1.7.2 Communication Process

Any significant changes affecting a covered task will be communicated to the *individual(s) performing that task as soon as reasonably possible.*

Changes to Policies/Procedures, and Communication of Change

Changes in Company or local operating methods or the use of new equipment are evaluated to determine the impact on covered tasks. At a minimum, the evaluation will determine:

1. *if a current covered task is affected,*
2. *if a new covered task is created,*
3. *what changes are necessary to the qualification materials, and,*
4. *the method for communicating the change to the appropriate employees.*

If a significant change/modification is made to PG&E's Operator Qualification Plan, PG&E will notify the CPUC of the change/modification.

1.7.2.1 Employee Responsibilities

All employees (including hiring hall) are also responsible for communicating to local supervision any significant changes that affect covered tasks they are assigned to perform.

Note

Any group gathering/meeting in regards to Operator Qualification shall be documented.

1.8 Record Keeping

1.8.1 Record Keeping Responsibilities

M&C, *Energy Delivery, Gas Transmission & Distribution*, *Customer Field Service*, and *PG&E Learning Academy* will ensure records demonstrating an individual's qualification to perform a covered task will be maintained, at a central location or at multiple locations, using one or more of the following methods:

- electronic qualification results
- hard copy of qualification results
- other appropriate methods

PG&E Learning Academy will record qualification results in the Training Server database for M&C and *Customer Field Service*.

1.8.2 Record Keeping Requirements

Qualification records will contain:

- covered task
 - method(s) of evaluation
 - date qualification completed
 - name and social security number of individual being qualified
 - PCC
 - area
 - qualification type (transitional, initial, or subsequent)
 - qualification period
 - tasks and sub-tasks objective
 - evaluator name and signature
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1.8.3 Record Retention

Records of an individual's current qualifications must be maintained while the individual is performing covered tasks for which he or she is qualified. After an individual is evaluated for subsequent qualification, the prior qualification record must be retained for a minimum of five years.

When an individual is no longer performing covered tasks, the qualification record must be retained for a minimum of five years.

1.9 Contractors

1.9.1 Contractors

The company will ensure that all individuals performing 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.

The Company may accept qualifications obtained under the programs of other operators or contractors when the following conditions have been met:

1. *the program complies with all provisions of 49 CFR Subpart N,*
2. *the standards used for qualification are acceptable to the Company, or*
3. *documented training is conducted on and by Company-specific procedures before initiating work activities.*

The Company may accept certifications (qualification) of individuals received from nationally recognized agencies, such as, but not limited to:

1. *American Society of Non-destructive Testing (ASND)*
2. *NACE International (formerly National Association of Corrosion Engineers)*
3. *Pacific Gas & Electric Company will at its option, require 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)

1.9.1.1 Applicant Installed Facilities (Option II)

Applicant installed facilities would normally not be covered under the Operator Qualification Rule. The installation of these facilities does not meet the four-part test for determining a covered task (see section 1.1.3).

1.9.1.2 Appendices

- DOT OQ Contractor Requirements (Supplement to Basic Plan 1.9)
- Contractors Flow Chart

These Appendices can be found in Part IV – Plan Appendices

1.9.2 Contractor Verification

Gas Distribution and Technical Services in conjunction with General Services and the Law Department will develop and maintain a clause on Operator Qualification for inclusion in contracts with contractors who perform covered tasks. Gas Distribution and Technical Services will distribute the clause to the contract administrators for inclusion in contracts.

Each functional department and/or *PG&E Learning Academy* will be responsible for the contractor verification process when contractors are used for work covered under this plan.

1.9.3 Record Keeping

Contractors must maintain records on personnel performing covered tasks as defined in Record Keeping in section 1.8. PG&E shall have the right to review such records and receive copies upon request.
