

Gas Operator Qualification Justification Process

The Process

Subject Matter Expert's Consensus A Committee was selected consisting of individuals from Operations, Maintenance and Construction (Local Operating Departments), Gas Distribution and Technical Services, Customer Field Services, California Gas Transmission and Learning Services for the purpose of determining subtasks for task identified by the IUWG Committee. This Committee was also responsible for identifying enablers for subtasks that were identified.

Process The Committee used an exhaustive process at several meetings to produce, edit and create the final list of tasks/subtasks enablers. The experience of frontline supervisors, trainers, managers, superintendents, and specialists were extremely critical in reaching consensus as a Committee.

The following components were necessary in determining enablers for the critical analysis:

- work assignments
- Company Standards and Practices
- job definitions
- DOT references
- Company/Union Contractual Agreements

SMEs See actual document for list of SMEs.

InterUtility Work Group Consensus (Basic Plan – Part IV Appendices) The IUWG (Inter-Utility Working Group) Committee refers to the tasks in this document as potential covered tasks, because each operator is responsible for identifying the covered tasks in its own respective system. As such, the tasks identified herein must be reviewed by each IUWG Member and modified as necessary to be consistent with the tasks performed, the components that make up each separate gas system, the degree of specialization of each work force, and the manner in which work is assigned.

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The Process, Continued

IUW Committee Members

Below are IUWG the Committee Members who assisted in developing a consensus covered task list as identified in the Appendix "A" of the Gas Operator Qualification Basic Plan. The Committee met over several dates to reach consensus and came to an understanding that each member may later modify the attached covered task list.

San Diego Gas and Electric Company	Pacific Gas and Electric Company	City of Palo Alto
City of Long Beach	SoCal Gas	Southwest Gas
Sacramento Municipal Utility District	Avista	

Guidelines

The Committee relied on the guidance in the Preamble to the Rule in applying the four-part test to the tasks as follows:

- Performed on a pipeline facility
- Is an operations or maintenance task,
- Is performed as a requirement of this part,
- Affects the operation or integrity of the pipeline

Company Basic Plan Intervals

**Operator
Qualification
Frequency**

(Basic Plan
1.2.2)

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

**Established
Intervals**

(Basic Plan
1.2.6)

Subsequent re-qualification intervals for all covered tasks shall not exceed five (5) years for each covered task.

Incidents

(Basic Plan
1.5)

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 S0335, local supervision will initiate an investigation of that individual's qualification to perform that covered task with assistance from HR Learning Services and/or the appropriate functional department as needed.

Also, under the DOT Drug Free Pipeline Act, employees are also subject to incident review whenever it is suspected that their performance may be a contributing factor in the unplanned release on natural gas or when certain financial or injury criteria are met.

Subsequent Frequency Support

Frequency Supporting Process

In determining subsequent re-qualification frequency, consideration was given to the following areas of support for field organizations performing covered tasks:

- SGOQPC (System Gas Operator Qualification Plan Coordinator)
- LGOQPC (Local Gas Operator Qualification Plan Coordinator)
- Field Audits
- Annual Review
- Verification of Qualified Individuals
- Employee/Management responsibilities
- Availability of reference materials
- Job Aids designed for a specific task
- Covered task work in non-covered task situations
- OJT Support
- Training Resources
- The Company Gas Emergency Response Requirements
- Abnormal Operating Conditions
- Supervisory expertise
- DOT Drug Free Pipeline Act Criteria
- Code of Safe Work Practices

Audits Schedule and Responsibility

(Basic Plan 1.1.11)

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.

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Subsequent Frequency Support, Continued

Annual Review 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:

(Basic Plan 1.1.12)

HR Learning Services care of [REDACTED] Room B101, 3301 Crow Canyon Rd., San Ramon, CA.

CGT mail to the System Integrity Group care of [REDACTED] GSM&TS, 375 N. Wiget Ln., Walnut Creek, CA.

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

Verification Process As outlined in the Company Gas OQ Plan under Section 1.6.1 “Verification of Qualified Individuals” local supervision, HR Learning Services, 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.

(Basic Plan 1.6)

Employee / Management Responsibilities **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.

(Basic Plan 1.1.10)

It is also the employee’s responsibility to know which tasks they are *not* qualified to perform. All department managers, superintendents and 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).

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Subsequent Frequency Support, Continued

Reference Materials / Sources

All employees and managers have available to them the following reference material and sources to assist them in the performance of covered tasks:

- Gas Standards and Specifications.
- Gas Maintenance Manual
- Company Standard Practices
- Company Policies and Procedures
- Code of Safe Work Practices
- Job Aids designed for a specific task
- Instruction design material
- Gas Distribution and Technical Services
- HR-Learning Services
- Engineering – Local Estimating and Mapping

Covered task work in non-covered task situations

Many tasks are performed in non-covered situations when the gas facility is either physically separated or new or reconstruction is underway. Thus, ample opportunity exists to maintain both knowledge and skill necessary to perform the work. Examples of this work are:

- New business construction
- Reconstruction
- Locating for reconstruction outside of USA requirements
- Fabrication and testing regulation station components

Training Services

Learning Services' has a core of instructors with field experience and is available to assist employees in developing and maintaining the appropriate knowledge and skill needed to complete covered tasks.

Database Security

All Operator Qualification data is centrally managed by one person, reviewed for accuracy, filed and inputted into the Company official database called "Training Server". Paper documents are currently being maintained for the immediate future.

OJT Support

Most of the frontline supervisors progressed from journey-level positions and have the technical knowledge; field experience expertise to assist employees who are performing covered tasks.

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Subsequent Frequency Support, Continued

Company Gas Emergency Plan

As part of its emergency Plan, Pacific Gas and Electric Company requires both covered and non-covered employees to receive annual emergency response training and have their knowledge and skill level assessed as outlined below. Covered and non-covered employees also participate in annual drills and exercises.

- Each employee in OM&C and FSD are required to receive four (4) hours of Annual procedural training (Exception – Call Center requirements is one (1) hour.
- All are required to have annual knowledge based assessment by local supervision
- All are required to have knowledge and skill Co-Assessments every 5th year
- Drills – Each frontline supervisor’s group with gas emergency responsibilities must conduct and review one drill per year.
- Exercises - Each frontline supervisor’s group with gas emergency responsibilities must conduct and review one exercise per year.

Abnormal Operating Conditions

A list of abnormal operating conditions have been developed to assist covered employees in the performance of covered tasks and is reviewed and updated annually, then tailboard with covered and non-covered employees annually or as needed.

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Subsequent Qualification Process

**Summary
Frequency
Justification –
Task Level**

In determining tasks, Pacific Gas and Electric Company working with the InterUtility Working Group (IUWG) which consists of eight (8) utilities/Municipalities in California and Nevada by consensus recommended a five (5) year maximum subsequent qualification frequency. The five (5) year subsequent frequency recommendation is at both the task and subtask level. The recommendation follows after much painstaking discussions and considerations of such issues as;

**References
Basic Plan Part
IV Plan
Appendices**

- Field support
- Functional Support
- Training
- Field Audits
- Supervisory Experience
- Incident Reviews, etc.

Given the support available in each of the areas listed above and the supervisor's right/responsibility to require re-qualification whenever concern exists about the individual's ability to perform the task and the incident review process, the five (5) year maximum subsequent frequency was agreed.

Also, by consensus, each Utility/Municipal will determine the frequency for Subtask based on its internal operating procedures and performance development support.

**Summary
Frequency
Justification
Subtask Level**

Similarly to determining tasks frequencies, Pacific Gas and Electric Company used 59 subject matter experts from its:

- Line Organizations
- Functional Departments, and
- HR-Learning Services

**References
Basic Plan Part
IV Plan
Appendices**

To assist in determining subsequent frequency qualification intervals for subtasks. Again, using consensus developed over many meetings and factoring in field support to line organizations in the form of field audits, Gas Standards and Specifications, training, job aids and task and subtask repetition along with the Code of Safe Work Practices and general industry information on qualification intervals, the group of SMEs determined that a five (5) year subsequent qualification is also appropriate at the subtask level.

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Subsequent Qualification Process, Continued

Summary	Additionally, SMEs also built into the process the ability for local
Frequency	management to review qualifications at any time there is reason to suspect
Justification	that the desired performance is not meeting the desired outcome. Also, a
Subtask Level,	process is also set in place to annually review covered tasks with both
Continued	covered and non-covered employees and document.
References	
Basic Plan Part	Furthermore, under the Company Gas Emergency Plan, emergency
IV Plan	procedural training and performance reviews of employees who respond to
Appendices	gas emergencies are done annually and documented.

Industry Requalifying Information

Industry Interval Standards

Requalifying intervals depend upon the nature of content. Items that must be performed from memory and are not practiced frequently are likely to undergo some forgetting and recertification / requalification is required.

The time interval between requalification can be determined by trail and error.

If...	Then...
Everyone recertifies / requalifies OK...	Add 33% to the length of interval*
Only a few fail to recertify / requalify	Leave time interval unchanged
More than a few fail to recertify / requalify	Subtract 20% for the length of interval

Requalification Reasons

Requalify periodically but only under these circumstances:

- For any task / process / operation that requires requalification and is infrequently performed
- For any task / process / operation that has been significantly changed
- As possible response to indications that an employee is deviating from prescribed procedures
- When required by law, regulation, policy or agreement

*Five-year subsequent qualification as defined in the Operator Qualification Basic Plan.