

DOT Gas Operator Qualification Program Talking Points

1. Why does PG&E have to develop another program with all the existing mandated training requirements?

The Operator Qualification (OQ) Program is being developed and implemented to comply with the new Subpart N in Title 49 Code of Federal Regulations (CFR) Part 192 (a.k.a. OQ Rule).

2. How did PG&E develop a written plan to comply with the regulation?

- Through alignment with other utilities in California, an Inter-Utility Working Group (IUWG) was established to identify issues and also to help provide a measure of consistency among the California utilities in ensuring compliance with the OQ Rule.
- A Utility Operator Qualification Committee (UOQC) was formed at PG&E to develop a plan to comply with the new Rule. Members of this committee are representatives of key stakeholder organizations (OM&C, CGT, CFS, SH&C, E&P, HR) impacted by the OQ Rule. Feedback and input from working groups of the impacted organizations assisted in developing the plan.

3. When will the OQ Plan take place?

- The OQ Rule requires a written plan be in place by April 27, 2001. Evaluation and qualification of individuals performing covered tasks needs to be completed by October 28, 2002.
- The timeline for OM&C:
 - Finalize Development of the OQ Plan - February 2001
 - Communicate OQ Plan - March through May 2001
 - Implement OQ Plan - May 2001 through January 2002

4. What OM&C resources are going to be required for implementation?

- Each Area will need to identify an individual that can commit fulltime (3-6 months) to coordinate and assist with the implementation of the OQ Plan. These individuals will be named Local Gas Operator Qualification Plan Coordinators (LGOQPC). These individuals are responsible for developing, monitoring, maintaining, and coordinating the local OQ Plans under the direction and support of the System Gas Operator Qualification Plan Coordinator (SGOQPC) and Area Directors. After the transitional qualifications are complete, the time demands on the LGOQPC will be reduced.
- First Line Supervisors (FLS) will be responsible for evaluating and qualifying their employees who perform covered tasks. If the FLS does not have the knowledge and/or background to perform the evaluations, other Area FLS's should be used. HRLS's instructors and E&P Distribution Specialists are available for special situations.
- The UOQC will be providing training for the LGOQPC's and the First Line Supervisors for maintaining the local aspects of the plan. An Evaluators Manual

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will provide guidelines for FLS to help ensure consistency in evaluations and compliance.

5. Who will be ensuring consistency and compliance of this OQ Plan?

- The implementation and communication plan is designed to ensure all OM&C gas employees, supervisors, superintendents, and directors are aware of the plan and their responsibilities.
- The LGOQPC will monitor compliance and consistency within the Area and the SGOQPC will monitor system compliance and consistency. Monthly status reports will be generated from Area monthly status reports through the implementation period. Thereafter, each Area LGOQPC will monitor ongoing compliance on a less frequent basis. This will continue to be evaluated as the program matures.
- All OM&C gas employees and supervisors are responsible for knowing and understanding the gas operator qualification plan. This includes not only knowing what covered tasks they are qualified to perform, but just as important, which covered task they are NOT qualified to perform.
- Annual reviews of the plan will be required for ALL OM&C gas employees and supervisors, even if they do not perform any covered tasks. It is important for each gas employee to understand the plan and know what covered tasks they are qualified to perform and, which covered task they are NOT qualified to perform.

6. What is the difference between initial, transitional, and subsequent qualification?

- "Transitional" qualification is for individuals who have been performing a covered task on a regular basis prior to April 27, 1999. Work performance history review may be used as the sole evaluation method for this type of qualification.
- "Initial" qualification is for individuals who were not performing a covered task on a regular basis prior to April 27, 1999.
- "Subsequent" qualification means evaluation of an individuals qualification after the transitional or initial qualification at the interval established by the operator.

7. What happens to individuals who do not qualify to perform a covered task?

- Should an individual not qualify, they will be given an opportunity to obtain the appropriate knowledge and skill through formal training, structured on-the-job training (OJT) designed by HR Learning Services, or OJT mentoring by a qualified person.
- A non-qualified individual may perform a covered task as long as a qualified individual is assigned to direct and observe the employee during the performance of the covered task.