

Electric Quality Verification Distribution Audit Procedure

SUMMARY

This procedure describes how Electric Quality Verification Distribution (EQVD – hereinafter, QVD) under Electric Operations Quality Management (EOQM) performs audits for systematic examination of activities supporting compliance to PG&E, North American Reliability Corporation (NERC), Western Electric Coordinating Council (WECC), California Public Utilities Commission (CPUC), and California Independent System Operator (CAISO) standards.

This procedure covers the QVD audit process from the initiation of the audit to the publishing of the final audit report.

Level of Use: Informational Use

TARGET AUDIENCE

All Quality Management (QM) QVD employees involved in audit activities.

SAFETY

Follow all applicable safety procedures throughout the audit process.

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PROCEDURE STEPS

1 Preparation Phase

1.1 Audit Initiation

1. QVD Supervisor or Quality Management (QM) Manager INITIATE audit from annual audit schedule or by direct request from senior leadership team.

1.2 Appointment of Audit Team

1. QVD Supervisor or QM Manager ASSIGN audit(s) AND CHOOSE Audit Lead and Team based on the following criteria:

- Audit experience
- Audit certifications
- Ability to best lead audit
- Competency in audit and quality principles
- Subject matter expertise

1.3 Audit Notification

1. Lead Specialist or QVD Supervisor CREATE introductory e-mail based on the Introductory Email Template which could include background, regulation, and tentative schedule. (See Email Template from most recent audit.)
2. Lead Specialist SEND draft introductory e-mail to QVD Supervisor.
3. QVD Supervisor SEND introductory e-mail to Audit Client, QM Leadership, and QVD Specialists.

1.4 Entrance Meeting

1. QVD Supervisor SCHEDULE Audit Entrance Meeting OR BYPASS the Entrance Meeting AND SEND an Entrance Meeting Email.

- a. IF choosing to send an Entrance Meeting Email,

THEN ENSURE:

- Approval from QM Manager and QM Director is obtained
- Entrance Meeting email template is used ([QVD Entrance Meeting Template.pptx](#))

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1.4 (continued)

- Entrance Meeting email is sent to Audit Client key stakeholders
- QM Director, QM Manager, QVD Analyst, and QVD personnel are copied
- b. Audit Lead or delegate SCHEDULE Audit Entrance Meeting to discuss the Audit Plan with the Audit Client. Invitees may include the following roles:
 - Audit client
 - QM Leadership
 - Process owner (where identified)
 - Auditee's Manager
 - Auditee's Director (or higher level)

1.5 Drafting Audit Plan

1. Working with Audit Client or delegate, Audit Lead or delegate, and QVD Supervisor, REFINE initial audit scope AND DRAFT purpose/objectives to reach agreement and common understanding.
 - a. Audit Scope
 - (1) DETERMINE Audit Scope by considering the following:
 - Lines of Business, Divisions, Districts, etc.
 - PG&E Policies, Standards, Procedures, Bulletins, etc.
 - Compliance standards
 - Physical assets
 - Field reviews
 - Records (paper and electronic)
 - Databases or software
 - Follow up on Corrective Actions (CAs) from prior audits
 - Timeframe

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1.5 (continued)

- (2) DEFINE what is not in scope.
- b. Audit Purpose and Objectives
 - (1) DEFINE what is to be accomplished by the audit. For example:
 - EVALUATE a group's conformance to a standard or procedure
 - ASSESS effectiveness and efficiency of a process
 - REVIEW field conditions and practices
 - COLLECT data to confirm improvement of a process
 - CONFIRM changes made because of CAs
2. Audit Client or delegate, QVD Supervisor and the designated Audit Team member(s) DISCUSS the following additional items:
 - a. Preliminary Schedule considerations
 - Availability of resources, people, and assets
 - Target date for completion
 - Conflicts with other organizations and regulatory bodies
 - b. Feasibility considering:
 - Availability of adequate resources
 - Adequate cooperation and participation by auditee
 - Sufficient information to properly plan audit
 - Accessibility of assets
 - c. Logistics considering:
 - Need for escorts or Qualified Electrical Workers (QEWs) and collective bargaining issues, if required
 - Environmental and Safety considerations
 - Travel, Finance, & Expense Standard Reviews

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1.5 (continued)

- Refer to Reference Documents: Supplemental References Table
- Access to databases or software (passwords, authorizations, etc.)
1.5.2.c. (continued)
- Access to secondary resources (auditable related data – ex: plat maps, mobile applications access, SAP documentation, etc.)
- Field conditions (Examples: driving accessibility, gate keys, customer permission, etc.)
- Situational awareness
- Availability of office space and materials for the Audit Team
- Resources to address CAs

1.6 Drafting Audit Plan and Beginning Audit Preparation

1. Audit Team FINALIZE draft Audit Plan AND INCLUDE:

- Header information (requester, Audit Lead, date, etc.)
- Audit scope and objective
- Audit criteria and reference documents (standards, procedures, bulletins, job aids, etc.)
- Preliminary audit dates and locations to be audited
- Audit Team member roles
- Preliminary list of records, databases, and physical assets to be audited
- Sampling methodology
- Plan for analysis of collected data
- List of CAs from prior audits to be reviewed (if in scope for audit)

2. Audit Team REVIEW the Audit Plan with the QVD Supervisor AND MAKE necessary updates based on review.

3. Audit Team PREPARE audit by doing the following:

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1.6 (continued)

- OBTAIN guidance documents, including applicable procedures, standards, job aids, and bulletins
- DEVELOP preliminary checklists and sampling plans
- BEGIN logistics planning to consider travel, accommodations, access to databases and facilities

1.7 Recording of milestone dates and progress in the QM Weekly Task Tracking Sheet

1. Designated Audit Team member PERFORM the following tasks throughout the project:

- Data collection checklists
- Log sheets
- Sampling plans
- Diagrams
- Process maps (flowcharts)
- Interview questions

2 Performance Phase

2.1 Pre-audit QVD Specialist Training (preferably in person / face-to-face)

1. QVD Supervisors and designated Audit Team Member(s) PREPARE the QVD Specialist to conduct the audit AND INCLUDE the following:

- Background information for audit
- Purpose of audit
- Scope of the audit
 - Definition of what is in scope
 - Definition of what is out of scope
- Tools and resources
- Sampling parameters
- Time frame

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2.1 (continued)

- QVD Area assignments
- Audit details

2.2 Holding Entrance Meeting or sending Entrance Meeting Email

1. Audit Team:

- a. COMMUNICATE audit plan during Entrance Meeting.
- b. RECORD attendance as evidence of the meeting:
 - Hard copy or
 - Electronic data, such as rosters or email invites
- c. INCLUDE the agenda items, such as:
 - Functional Area (FA) Point Contact and required attendees
 - Facility safety requirements
 - Introductions
 - Overview of audit process, including roles and responsibilities
 - Review of audit plan including audit scope and objectives
 - Review of audit dates, times, and places
 - Confirmation of QVD communications including frequency
 - Confirmation of logistics including access to documents, databases, facilities, and people
 - Special field and office safety requirements and personal protective equipment (PPE) considerations
 - Projected date for Exit Meeting
 - Auditee questions
 - Significant changes to process, facilities, or organizations
- d. STORE Entrance Meeting materials in the appropriate area.

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2.2 (continued)

- Distribution (QVD) – Controlled Documents folder on the shared drive
- e. USE “QVD Corrective Actions Job Aid”, as needed.
 - See [RISK-6501P-05-JA01 Quality Verification Distribution \(QVD\) Corrective Actions Job Aid](#)

2.3 Audit Activities

1. Audit Team:

- a. BEGIN collecting information relevant to the audit scope and objectives by:
 - Scheduling and conducting interviews
 - Reviewing to understand the guidance documents (procedures, standards, etc.)
 - Examining evidence and performing possible site reviews and comparing them to the audit criteria.
 - Using corresponding field guides, such as **RISK-6301P-Att04, “QVD Construction Field Guide”**
- b. IF any hazards are encountered during the performance of an audit,
THEN REPORT immediately, following appropriate protocol (911, corporate security, QVD Supervisor, etc.).
- c. USE only objective evidence.
- d. CONDUCT weekly Audit Team nonconformance review (via Microsoft Teams or in person).
 - Mandatory attendees: All Distribution personnel who are performing current audit
 - FOLLOW [Non-Conformance Review Call Process](#)
 - REVIEW each QVD Specialist’s nonconformance findings for the previous week AND:
 - PRESENT
 - GATHER input

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- GAIN Team consensus

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2.3 (continued)

- DECIDE AND ANNOUNCE
- e. ENTER all nonconformances into the Corrective Action Program (CAP).
 - To enter a nonconformance into the CAP, USE [RISK-6501P-05-JA01 Quality Verification Distribution \(QVD\) Corrective Actions Job Aid](#).
 - COMMUNICATE with FA Supervisor on a weekly basis regarding field and document findings
 - ENSURE alignment for all nonconformances BEFORE assigning the CAP to the FA
- f. Audit Team KEEP the QM Manager and QVD Supervisor informed of the progress of the audit and information may include the following:
 - Status of audit activities
 - Audit non-conformances, observations, potential findings, and significant issues
 - Obstacles, concerns, or schedule changes
 - QVD Supervisor or designee communicates weekly update to the Audit Client

2.4 Audit Communications

1. Weekly Communication Schedule for Quality Verification (QV) Specialists
 - a. Week (1) Example:
 - (1) **AUDIT** orders Monday through Thursday
 - (2) **PULLS** Excel Report on Friday
 - b. Week (2) Example - Monday:
 - (1) QV Team **REVIEWS** Non-Conformance Report / Findings from Week 1
 - (2) QV TEAM **REVISES/UPDATES** and/or makes **CORRECTIONS** in Audit Checklists from Week 1
 - c. Week (2) Example - Wednesday:

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2.4 (continued)

- (1) Quality Support (QS) Analyst **FINALIZES** reporting in Power BI Dashboard, Non-Conformance Photo Links.
 - (2) QS Analyst **SENDS** previous week's preliminary results email to all participants identified within the QVD & QVT entrance email.
 - (3) **NOTE:** This begins the 7-day calibration period for the Functional Area receiving the results/responsible for the nonconformances.
- d. Week (3) Example – Wednesday:
- (1) Once the email is **SENT** on Wednesday of Week 3 by the QS Analyst, all "preliminary findings" from previous week become a final finding.

3 Analysis Phase

3.1 Analyzing the data

1. Audit Team:
 - a. As the objective of the analysis, **CONVERT** data into useful information.
 - b. **LOOK** for patterns in the data that indicate how well the area under focus in the audit complies with the audit standards.

NOTE

The type of data analysis the Audit Team uses depends on the type of information collected during the audit.

- Quantitative Data is numerical data that can have mathematical techniques applied, such as averages (mean, mode, median) and standard deviation.
- Qualitative Data is descriptive and can come from interviews, questionnaires, customer complaints. Analysis of qualitative data can often be subjective and may require interpretation from the audit team.

- c. **OPTIONALLY PERFORM** data analysis on data from a variety of sources, including:
 - Checklists
 - Interview information
 - Data obtained from database system of records (such as SAP)

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3.1 (continued)

- Process maps if applicable
- d. USE charts and graphs to aid in the understanding of the data and to clearly communicate the information.
- e. Depending on the type of data collected, **OPTIONALLY CHOOSE** from the following types of charts or graphs to clarify the message of the information:
 - Bar Charts
 - Histograms
 - Pie Charts
 - Line Graphs
 - Scatter Charts
 - Pareto Charts
- f. **DETERMINE** if there are issues to report by comparing audit evidence against the audit criteria, which may include verifying information with the following individuals:
 - Subject Matter Experts
 - Interviewees
 - Compliance Experts
- g. USE [RISK-6501P-05 Att.2 QVD Risk Significance Matrix: H-M-L](#) to identify the risk significance of each nonconformance based on:
 - Impact of equipment, failure, or exposure to hazard
 - Probability of equipment, failure, or exposure
 - Impact of record error
 - Degree of record importance
- h. **CALCULATE** overall compliance score by number of defects divided by the number of opportunities for a defect, known from Lean Six Sigma as Defects per Opportunity (DPO).

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3.1 (continued)

- A defect, also known as a nonconformance (NC), is an audit finding that represents a violation of a policy, procedure, or standard.
 - Opportunities, in relation to defects, are areas within an asset where a defect could be produced (the chance to commit errors).
 - DPO and compliance score are calculated by dividing the total number of defects into the total number of opportunities for an asset. This produces a defect rate % which is then deducted from 100% to determine the overall compliance score.
 - (1) Equation: $100\% - (D \div O) = \text{Compliance \%}$
 - (2) For Construction audits: the number of opportunities is the applicable section of the Construction Completion Standards Checklist (CCSC) used to audit the asset.
 - (3) For Inspection audits: the number of opportunities is the applicable section of the overhead and underground inspection job aids for Compliance Inspectors.
- i. When the analysis phase is complete based on the objectives of the audit, BEGIN PREPARATION of the Exit Meeting materials.

4 Reporting Phase

4.1 Audit Team PREPARE AND SCHEDULE Exit Meeting

1. QVD Supervisor can optionally bypass the Exit Meeting by sending an Exit Meeting email instead. If this option is chosen, ENSURE:
 - Prior approval from QM Manager and QM Director is obtained
 - Exit Meeting email template is used ([QVD Exit Meeting Template.pptx](#))
 - Exit Meeting email is sent to Audit Client key stakeholders
 - QM Director, QM Manager, QVD Analyst, and QVD personnel are all copied on the Exit Meeting email
2. IF conducting an Exit Meeting is chosen instead of sending an Exit Meeting email:
THEN:
 - Lead Specialist GENERATE Exit Meeting agenda

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4.1 (continued)

- Audit Team PREPARE Exit Meeting presentation, which may include:
 - Purpose of meeting, desired outcome, required attendees
 - Audit Team, purpose, scope, objectives
 - Tier definition
 - Issues as described in RISK-6501S [Electric Operations Quality Management Standard](#)
 - Next Steps
 - Process Maturity Model
 - Appendices
- Lead Specialist VERIFY delivery AND/OR acceptance of issues with Audit Client.

4.2 Review of Exit Meeting materials by QVD and QM Manager

1. Before providing to QVD Supervisor for review, Audit Team members REVIEW Exit Meeting materials.
2. QVD Supervisor REVIEW AND APPROVE Exit Meeting materials.
 - a. IF the QVD Supervisor asks for revision of material,
THEN PROVIDE comments AND RETURN to Audit Team for changes.
 - b. IF the QVD Supervisor approves the material,
THEN FORWARD Exit Meeting material to QM Manager
3. QM Manager REVIEW the Exit Meeting material.
4. Audit Team ALLOW 2 days for QM Manager to review.
 - a. IF the QM Manager asks for revision of material,
THEN MAKE revision OR JUSTIFY not revising AND RETURN to Audit Team for changes.
 - b. Once the QM Manager approves the material, the Exit Meeting can be held.

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4.3 Exit Meeting

1. QM Manager CONDUCT Exit Meeting to communicate audit results.
 - a. In Exit Meeting, DISCUSS:
 - Introductions
 - Formal appreciation to auditee
 - Presentation of Exit Meeting materials
 - Clarification of audit results and conclusions
2. RETAIN attendance record as evidence of meeting.
3. STORE Exit Meeting materials in the appropriate area.
 - Distribution (QVD) – Controlled Documents folder on the shared drive

4.4 Review of Exit Meeting Materials by Audit Client

1. Audit Lead ALLOW seven calendar days for Audit Client and Client Team to review all the audit materials and to provide the Audit Lead with issues, comments, or recommended changes.
 - a. IF Audit Client determines there are issues,

THEN DISCUSS with Audit Lead for resolution.

NOTE

Seven calendar days is an expectation. If more time is needed, the client will be granted a reasonable extension on approval from the QM Manager.

4.5 Discussion and Resolution of Issues

1. Audit Lead PROVIDE opportunity to Audit Client to present additional evidence that was not identified during the audit or to clarify requirements.
 - a. IF the Exit Meeting material is found to be inaccurate,

THEN Audit Lead CHANGE Exit Meeting material as needed AND COMMUNICATE changes to Audit Team.
 - b. IF Audit Client has not requested clarification or additional evidence within the waiting period,

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4.5 (continued)

THEN MOVE to complete the final audit report.

4.6 Completion of Audit Final Report

1. Audit Team COMPLETE Audit Report using [RISK-6501P-05 Att.3 Audit Final Report Template](#)
2. Lead Specialist CREATE a PDF copy of the Audit Report AND PLACE both the PDF and Word versions into the controlled documents folder:
 - Distribution (QVD) – Controlled Documents folder on the shared drive

4.7 Publication of Audit Final Report

1. Lead Specialist SEND the audit final report to all identified parties in the QM and Audit Client organizations.

4.8 Audit Records Retention

1. Audit Lead ENSURE required audit records are in controlled document folders on the shared drive, including the following mandatory audit records:
 - Entrance Meeting Materials (to include attendance roster)
 - Exit Meeting Materials (to include attendance roster)
 - Audit Final Report

END of Instructions

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DEFINITIONS

Annual Audit Plan: A document created at the beginning of each year to identify focus areas for the coming year's audits. This plan is the result of collaboration between EO QM and Electric Operations departments.

Audit: Independent, documented, and planned activity performed by independent auditing organization. Audit assesses a work process to objectively evaluate the effectiveness of internal controls in managing all aspects of risks and ensuring compliance with policies, standards, procedures, and/or applicable legal and regulatory requirements.

Audit Client: The audit requester and the related organization, group, or person being audited.

Audit Schedule: A document describing the rolling 12-month audit schedule.

Audit Team: Consists of Lead Specialist and additional team members assigned to a particular audit.

Audit Team Lead: A qualified Specialist who assists Supervisors with organizing audit phases.

Criteria: Set of specific requirements against which auditor tests and evaluates information collected as part of audit process. Audit criteria may include, but are not limited to organizational objectives, policies, practices, and procedures; industry and other standards; and legislative or regulatory requirements.

Compliance: Adherence to policies, plans, procedures, laws, regulations, and commitments.

Corrective Action (CA): Action taken to resolve finding OR issue by implementing changes or controls to prevent recurrence.

Defect / Nonconformance (NC): An audit finding that represents a violation of a policy, procedure or standard.

Findings: Results from the evaluation of collected audit evidence against audit criteria.

Noncompliance: An audit finding that represents a violation of a legal or regulatory requirement.

Objective: Statement of what is to be accomplished by an audit.

Observation: An audit condition that represents a concern that is not a violation of a policy, procedure, standard, or other applicable legal or regulatory requirement. Observations are usually an opportunity for improvement.

Opportunity: In relation to defect is any area within an asset where a defect/NC could be produced (where there is a chance to commit errors).

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Positive Practice: A method to convey best practices or novel solutions to challenges that should be highlighted to management for possible use in other groups, divisions, or organizations.

Risk Ranking Field

- **High Significance (Immediate):** An audit finding that represents a noncompliance with an internal standard, procedure, or other guidance document, or with a legal or regulatory requirement, and which represents an immediate safety or system reliability concern.
- **Medium Significance (Not Immediate):** An audit finding that represents a noncompliance with an internal standard, procedure, or other guidance document, or with a legal or regulatory requirement, and which represents a potential safety or system reliability concern but does not pose an immediate threat.
- **Low Significance (Best Practice):** An audit finding that represents a noncompliance with an internal standard or external regulatory requirement but does not represent a potential safety or system reliability concern. (This may include observations and areas for improvement.)

Risk Ranking Records: Nonconformances identified during documentation audits will be prioritized individually based on risk and regulatory standard ranking. Determining factors may include impact to Bulk Electrical System, impact of exposure to hazard such as ignition source, potential for injury, nature of injury or property damage, risk of exposure to the public, workers, or employees, and all Regulatory conditions or infractions

Scope: Statement defining audit extent and boundary of audit such as divisions, districts, groups, or work centers to be covered.

Specialist: A Qualified Electrical Worker (QEW) who meets and adheres to the requirements and qualifications referenced in Appendix D below.

IMPLEMENTATION RESPONSIBILITIES

The document owner publishes this procedure to the Guidance Document Library (GDL).

GOVERNING DOCUMENT

RISK-6501S [Electric Operations Quality Management Standard](#)

COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

Records and Information Management:

Information or records generated by this procedure must be managed in accordance with the Enterprise Records and Information (ERIM) program Policy, Standards and Enterprise Records Retention Schedule (ERRS). REFER [GOV-7101S, "Enterprise Records and](#)

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[Information Management Standard](#) and related standards.

Management of records includes, but is not limited to:

- Integrity
- Storage
- Retention and Disposition
- Classification and Protection

REFERENCE DOCUMENTS

Developmental References:

- ASQ’s Foundations in Quality, Certified Quality Auditor, 1998
- International Standard, ISO 19011, Guidelines for quality and/or environmental management systems auditing, 2002

Supplemental References:

Driving Standard / Procedure #	Driving Standard / Procedure Title
SAFE-1002S	Motor Vehicle Safety Standard
SAFE-1004S	Safety Incident Notification and Response Management
SAFE-1018S	Phone-free Driving Standard
TRAN-1002S	Requirements for Driving a Company Vehicle
TRAN-1003S	Business Use of Personal Vehicles
TRAN-1003S Att 2	Att.2 - Division/Dept Director Authorization (DDA) (Form 62-3765)
Travel & Finance Standard/Procedure #	Travel & Finance Standard / Procedure Title
FIN-2210S	Employee Business Expenses and Travel Standard
FIN-2210P-01	Arranging Travel and Reimbursing Business Expenses Procedure
	Travel Program Website

APPENDICES

[Appendix A, Overhead and Underground Missed Inspection Process](#)

[Appendix B, Real Time Audit Process](#)

[Appendix C, Front Line Supervisor Ride-A-Longs](#)

[Appendix D, QVD Specialist Qualifications and Job Description](#)

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[Appendix E, QVD NC Call Book: Updating and Maintaining](#)

[Appendix F, QVD Process Flow Chart](#)

[Appendix G, Quality Verification Overtime and Presentation/Meeting Request Guidance \(Requesting/Approving OT and Presentation/Meeting Requests\)](#)

ATTACHMENTS

[RISK-6501P-05-JA01 Quality Verification Distribution \(QVD\) Corrective Actions Job Aid](#)

[RISK-6501P-05 Att.2 QVD Risk Significance Matrix: H-M-L](#)

[RISK-6501P-05 Att.3 Audit Final Report Template](#)

[RISK-6501P-05 Att.4 QVD Construction Field Guides](#)

DOCUMENT REVISION

RISK-6301P-12, "Electric Quality Verification Distribution Audit Procedure", 02/12/2024, Rev. 3.

DOCUMENT APPROVER

[REDACTED], Director, Quality Management

DOCUMENT OWNER

[REDACTED], Director, Quality Management

DOCUMENT CONTACT

[REDACTED], Supervisor, Electric, QVD, North/South

REVISION NOTES

Where?	What Changed?	Who?	When?
Appendices	Added Appendix G, "Quality Verification Overtime and Presentation/Meeting Request Guidance (Requesting/Approving OT and Presentation/Meeting Requests)"	[REDACTED]	2-29-2024

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Appendix A, Overhead and Underground Missed Inspection Process

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Target Audience Electric Quality Verification Distribution Supervisors and Specialists

Intent of Process To describe the steps to take when it is suspected that assets were not inspected during a review of a G.O. 165 Compliance Inspection. This process is not intended to identify situations related to the quality of a completed inspection.

1. Scope

- a. Completed Overhead and Underground (OH & UG) inspections
- b. Documentation review that includes all map package contents
- c. Location review

2. Definitions

- a. *Suspect* - 2 or more of the OH or 1 or more of the UG characteristics exist leading to question if an inspection was performed as stated. Requires additional investigation to determine a confirmed suspect conclusion.
- b. *Missed* - Facility was obviously not inspected due to the lack of evidence or the high volume of maintenance conditions not addressed at the location.

3. Initiating Event - Facilities reported as inspected that exhibit one or more of the following characteristics:

a. Overhead (OH)

- i. Facility on map not highlighted
- ii. Minor work not completed as stated
- iii. Compelling abnormal or excessive regulatory conditions not addressed or identified
- iv. Access issues that would make it very difficult to get to location

b. Underground (UG)

- i. Facility on map not highlighted
- ii. Paved or built over facilities
- iii. Excessive debris outside facilities, vents are full
- iv. Dense vegetation in front of/on top of facilities
- v. Excessive debris inside facilities
- vi. Missing inspection sticker
- vii. Compelling abnormal or excessive regulatory conditions not addressed or identified
- viii. Access issues that would make it very difficult to get to location

4. Suspect Location (OH and UG)

- a. Taking into consideration the Map California Public Utilities Commission (CPUC) due date and as soon as practical, the QV Specialist will review the prescribed number of facilities below to verify the location was missed. These facilities will be in addition to the QV Specialist's predetermined unit count for the map.

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Appendix A, Overhead and Underground Missed Inspection Process

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- i. **OH** - 4 additional facilities, 2 on either side of the suspect location if they can be safely accessed
 - ii. **UG** - 2 additional facilities, 1 on either side of the suspect location if they can be safely accessed
 - b. Once a missed inspection is verified by the QV Specialist; Notify the QV Supervisor and the Compliance Supervisor via phone call followed up by an email with the following information:
 - i. OH/UG map number
 - ii. Date map inspected, units on map
 - iii. Date suspect facility was identified and name of QV Specialist who identified it
 - iv. CPUC due date on map
 - v. Name of inspector and LAN ID
 - vi. Summary of the assets verified in relation to the missed inspection. *Example:*
 - UG Map #: C1801
 - Map Date: 8/15/19, 95 Units
 - Found by: Specialist Name (Lan ID) on 10/28/19
 - Map CPUC Due Date: 12/31/19
 - Inspected by: Inspector Name (Lan ID)
 - Missed Inspection: Subsurface SW-1234 was not highlighted on UG map C1801. A field review found that there was no inspection sticker in the enclosure. Each of the facilities on either side of this location had the current year inspection sticker and appeared to have been inspected.

END of Instructions

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Appendix B, Real Time Audit Process

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SUMMARY

Improve compliance with PG&E Construction Standards and General Orders 95/128.

Assist supervisors and crews in improving quality of work, driving consistency, and minimizing risk to public and employee safety.

Reduce the number of nonconformances found by outside agencies.

PROCEDURE STEPS

1 Sampling

1.1 Audit 1 supervisor and crew in each of the 19 divisions.

2 Preparation Phase

2.1 Quality Verification Specialist (QVS) randomly SELECT 1 supervisor in each division 3 – 4 weeks prior to the audit.

2.2 QVS CONTACT the randomly selected supervisor in each division to schedule a day for the audit.

2.3 QVS has the option to pair up with another QVS during this audit.

2.4 Construction supervisor and QVS AGREE upon the job to audit.

2.5 QVS REVIEW the job / location AND IDENTIFY all applicable standards that need to be followed for that specific job / location prior to the field audit date.

2.6 QVS REVIEW the applicable CCSC form to identify any additional items that will need to be addressed at that location prior to the field audit date.

2.7 QVS MAKE copies of all applicable standards OR HAVE an electronic version available to review with the crew if the need arises.

2.8 Prior to the field audit, the division superintendent and QVS FACILITATE a meeting with the crews in the yard to be audited to discuss the purpose and desired outcome of the audit.

3 Audit Phase

3.1 Construction supervisor and QVS BE PRESENT at the location with the crew during the field tailboard briefing.

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Appendix B, Real Time Audit Process

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1. IF the supervisor is unable to attend,

THEN QVS RESCHEDULE.
2. IF the crew is resistant to the audit,

THEN QVS LEAVE the location AND RESCHEDULE a different location and / or crew with supervisor.
- 3.2 Construction supervisor and QVS TALK to crew about the required standards, material to be used, and additional work from the CCSC form that needs to be addressed.
- 3.3 QVS VALIDATE that the crew is in possession of the current Overhead and Underground (OH & UG) Construction Standard Manuals (hard copies or electronic versions – either are acceptable).
- 3.4 IF the crew does not possess the current revisions,

THEN QVS CREATE a nonconformance.
- 3.5 Construction supervisor and QVS REMAIN onsite throughout the entirety of the job to answer any questions the crew may have and to provide any feedback.
- 3.6 Construction supervisor PROVIDE all directions to the crew.
 1. QVS DOES NOT DIRECT the crew in any way.
 2. DO NOT ISSUE Nonconformances for work conducted.
- 3.7 At the end of the job, the location will be built in accordance with PG&E construction standards.

4 Reporting Phase

- 4.1 QVS TAKE before and after photos of the work location AND UPLOAD them to the Enterprise Corrective Action Program (ECAP).
- 4.2 QVS ENTER the location into ECAP.
 1. DOCUMENT standards used by creating an observation and document standards in comments.
 2. DOCUMENT any feedback given as an observation; nonconformances will not be issued for work conducted.

Electric Quality Verification Distribution Audit Procedure

Appendix B, Real Time Audit Process

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3. IF the crew is not in possession of current revisions of the OH & UG Construction Standard Manuals,

THEN create a nonconformance Action Item in CAP AND ASSIGN to the Supervisor of the crew.
- 4.3 Construction supervisor and QVS PROVIDE feedback to the crew at the end of the job. The crew will also have an opportunity to provide feedback to the supervisor and QVS.
 1. QVS DOCUMENT any feedback from the crew or supervisor as an observation in ECAP
- 4.4 IF more feedback is given by the crew after QV departs:

THEN:
 1. Construction supervisor SEND an email with the crew's feedback, comments, or concerns to the QVS.
 2. QVS DOCUMENT the feedback, comments, or concerns as an observation in ECAP.
- 4.5 AT the end of the audit, QVS SHARE the results of the real time audit with the Directors and Sr. Director.

END of Instructions

Electric Quality Verification Distribution Audit Procedure

Appendix C, Front Line Supervisor Ride-A-Longs

Page 1 of 2

SUMMARY

The purpose of the ride-a-long is to foster a stronger partnership with Quality Verification (QV), to provide an educational opportunity for the Supervisors, and to recalibrate the line of business understanding of our rules using the expertise of the QV Specialist (QVS).

Accompanying the QVS during the field audits will also allow us to immediately address any findings through the creation of Electric Compliance (EC) notifications.

Building our facilities to a high standard and free of infractions is a critical responsibility for our workgroup to maintain public and employee safety.

PROCEDURE STEPS

1 Roles and Responsibilities (Preparation Phase)

1.1 QVD Specialist

1. Communicate to the of Functional Area (FA) Supervisor which days the audit will take place.
2. Extend an invitation to the Supervisor/delegate to participate in a ride-a-long

1.2 FA Supervisor

1. Schedule a day to ride with QVD Specialist

2 Roles and Responsibilities (Audit Phase)

2.1 QVD Specialist

1. Explain the details of the QV Audit Process to the FA Supervisor: (Field location & Documentation)
2. Gain alignment on any nonconformance(s) found during the audit
3. Discuss any recent changes to all applicable standards
4. Discuss clarifications to all applicable standards

2.2 FA Supervisor

1. Gain alignment on any nonconformance(s) found during the audit

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Appendix C, Front Line Supervisor Ride-A-Longs

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2. Discuss any recent changes to all applicable standards
3. Discuss clarifications to all applicable standards

3 Roles and Responsibilities Results Phase

3.1 QVD Analyst

1. Record the number of ride-a-longs completed by each QVD Specialist
2. Report what the participation rate was to the FA during the exit meeting presentation

END of Instructions

Electric Quality Verification Distribution Audit Procedure

Appendix D, QVD Specialist Qualifications and Job Description

Page 1 of 7

SUMMARY

This procedure describes the Quality Verification Distribution (QVD) Specialist qualifications for performing quality audits of PG&E Electrical Distribution Assets.

This procedure covers the minimum and desired qualifications for the Specialist roles of Senior and Expert within QVD.

Level of Use: Informational

TARGET AUDIENCE

All Quality Management QVD employees involved in audit activities.

ELECTRIC QVD SPECIALIST, SENIOR QUALIFICATIONS

A. Education

1. Minimum
 - a. High School Diploma or
 - b. GED – General Education Development
2. Desired
 - a. Degree in job-related discipline or equivalent experience

B. License/Certification

1. Minimum
 - a. QEW-Qualified Electrical Worker certification
 - b. CA Class C License, or equivalent
2. Desired
 - a. ASQ-American Society for Quality CQA-Certified Quality Auditor certification
 - b. ASQ-American Society for Quality Improvement Specialist certification

C. Experience

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Appendix D, QVD Specialist Qualifications and Job Description

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1. Minimum
 - a. 1 year, Leadership Experience, job related, (Crew Foreman, Safety, etc.).
 - b. 5 years, Electrical Lineman Experience
2. Desired
 - a. Experience at PG&E, job related
 - c. 1 year, Quality Assurance/QVD Experience

D. Knowledge, Skills, Abilities, and Competencies

1. Minimum
 - a. Ability to travel up to 25 percent of working time
 - b. Knowledge of electric distribution systems concepts, methods, best practices, techniques, and regulatory requirements as needed to perform at the job level
 - c. Basic computer skills (Microsoft Office familiarity)
 - (1) Knowledge of Microsoft Office products – for example, Excel, Word, PowerPoint, and Access – as needed to perform at the job level
 - (2) Ability to send/receive emails
 - (3) Ability to read, search, and work in Microsoft Excel
 - d. Knowledge of CPUC General Orders (95, 128, 165)
 - (1) Understand the difference between the three and know how to navigate them
 - (2) Knowledge of relevant federal, state, and local construction codes and standards as needed to perform at the job level
 - e. Familiarity with Adobe Reader/Acrobat
 - (1) Ability to search and navigate a .pdf file
 - f. Ability to pay attention to details, be careful about details and thorough in completing work tasks

2. Desired

Electric Quality Verification Distribution Audit Procedure

Appendix D, QVD Specialist Qualifications and Job Description

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- a. Competency in developing and delivering multi-mode communications that convey a clear understanding of the unique needs of different audiences
- b. Knowledge of RCA (Root Cause Analysis) theories, concepts, methods, best practices, and techniques as needed to perform at the job level
- c. Knowledge of other relevant federal, state, and local regulations and laws – for example, FERC, NERC, and CAISO – as needed to perform at the job level
- d. Competency in planning and prioritizing work to meet commitments aligned with organizational goals
- e. Competency in making sense of complex, high quantity, and sometimes contradictory, information to effectively solve problems
- f. Knowledge of electric transmission systems concepts, methods, best practices, techniques, and regulatory requirements as needed to perform at the job level
- g. Competency in building partnerships and working collaboratively with others to meet shared objectives

ELECTRIC QVD SPECIALIST, EXPERT QUALIFICATIONS

(In addition to the qualifications for the QVD Specialist, Senior)

A. License/Certification

1. Desired

a Within 1 year of becoming an Expert:

- (1) ASQ-American Society for Quality CQA (Certified Quality Auditor) certification (or)
- (2) ASQ-American Society for Quality Improvement Specialist certificate

B. Experience

1. Minimum

a 1-year, Electric QVD Experience

C. Knowledge, Skills, Abilities, and Competencies

Electric Quality Verification Distribution Audit Procedure

Appendix D, QVD Specialist Qualifications and Job Description

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1. Minimum
 - a Competency in planning and prioritizing work to meet commitments aligned with organizational goals
 - b Knowledge of the top 10 nonconformance findings for Electric Distribution
 - (1) Competency regarding where to find the correlating Internal Standards associated with each nonconformance
 - c Knowledge of Internal PG&E Construction Standards, Overhead and Underground
 - (1) Competency regarding where to find the correlating Internal Standards associated with each nonconformance
 - d Knowledge of Internal PG&E Inspection Manual and Electric Distribution Preventive Maintenance (EDPM) Manual
 - (1) Competency regarding where to find the correlating Internal Standards associated with each nonconformance

D. Supplemental

1. Minimum
 - a Ability to travel up to 50 percent of working time
 - b Ability to act as an audit lead once every year/every other year depending on number of Experts in the Organization
 - c Ability to assist QVD Supervisor with the following:
 - (1) Reviewing and/or updating QVD Standard, Processes, and Training
 - (2) Facilitating QVD Team Trainings
 - (3) Providing Quality reviews of QVD Specialist Senior audits/work
 - (4) Mentoring new hires to the QVD Team and existing QVD Specialist Seniors

End of Qualifications

Electric Quality Verification Distribution Audit Procedure

Appendix D, QVD Specialist Qualifications and Job Description

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ELECTRIC QVD SPECIALIST JOB DESCRIPTION

TARGET AUDIENCE

QVD Supervisors who post new QVD Specialist positions/requisitions.

B. Instructions to post Job Description

1. Request a copy of the current job description from Human Resources (HR) and/or the job requisition recruiter.
2. Ensure the job description information received from HR adheres to the remaining information below of Appendix D.

Position Summary

The Electric Distribution Quality Verification (QV) Specialist conducts field assessments on PG&E's electric distribution facilities. These work assessments focus on verifying the quality of:

- Overhead (OH) and underground (UG) inspections as required by GO 165.
- Construction work performed by division construction crews in conjunction with emergency and planned Electric Corrective (EC) notifications to ensure facilities are repaired/constructed per the requirements of PG&E Construction Standards.
- Compliance Inspection and Construction supervisors completed work verification of the inspectors and crews.

Job Responsibilities

- Works independently, utilizing advanced knowledge of electric utility regulatory general orders to complete deep reviews and analysis of the construction work, uncovers complex findings and root causes and prepare comprehensive recommendations for leadership.
- Partners with division leaders on identifying root causes, trends, process improvements and in implementing solutions.
- Provides assistance and coaching to lower-level peers, including on the job training for new Senior Specialists. May handle questions regarding more complex verification situations. Acts as a technical resource for PS&R and construction field supervisors.
- Validates quality of completed work by construction crews and compliance inspectors using advanced knowledge of construction standards and general orders. Leads cross-division special projects or initiatives. Is the go-to lead and subject-matter expert.

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Appendix D, QVD Specialist Qualifications and Job Description

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- Facilitates post verification review meetings. Summarizes and presents complex findings to leaders. Uses advanced communication skills to determine appropriate content for target audience. Conveys findings and recommendations seeking buy in on recommendations. Develops new methods for communicating issues, concerns, and best practices.
- Performs additional audit, quality verification and/or validation activities to support compliance with GO 165, 95 and 128 or to support other regulatory audit requirements.
- Understands, demonstrates and coaches lower-level peers on all company and regulatory safety practices and requirements.
- Responsible for resolving gaps between external requirements and internal standards.
- Establishes new processes for emergent quality verification audit requests.
- Leads tailboard discussions with Compliance Inspectors and Construction Crews within all divisions.
- Facilitates updates to Call book with new calls that requires research of General Orders and Construction Standards.
- Conducts quality verification audits in Divisions where a Specialist has vacated.

Qualifications

Minimum:

- High School Diploma or GED
- Seven (7) years of total relevant experience
- Valid CA Driver's License
- Qualified Electrical Worker (QEW)
- Completion of a federal or state sanctioned apprenticeship with approved supporting documentation (e.g., IBEW Journeyman A Ticket) and/or union, non-union, or union-affiliated sponsored apprenticeship or equivalent experience
- Ability to travel 50% of the time within the PG&E service territory

Desired:

- Bachelor's Degree in job-related discipline or equivalent experience

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Appendix D, QVD Specialist Qualifications and Job Description

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- Excellent communication skills
- Strong attention to detail and organizational skills
- Advanced knowledge of General Orders 165, 95, and 128
- Excellent understanding of the Electric Distribution Preventive Maintenance Program
- Advanced knowledge of the requirements of the OH and UG Construction Manual
- Strong data analysis and reporting skills
- Advanced Microsoft Outlook, Excel, and Word skills; proficiency with PowerPoint
- Excellent teamwork and collaboration skills
- Broad knowledge of root cause investigation methods and techniques
- Previous PG&E experience as a Compliance Inspector, Journey Lineman, Field Engineer Technician, M&C Coordinator, or Quality Specialist
- ASQ Certified Quality Specialist or equivalent
- ASQ Certified Quality Improvement Specialist

End of Job Description

Electric Quality Verification Distribution Audit Procedure

Appendix E, QVD NC Call Book: Updating and Maintaining

Page 1 of 5

SUMMARY

This procedure describes the process for updating and maintaining the Electric Quality Verification Distribution (QVD) nonconformance (NC) Call Book.

Level of Use: Instructional and informational

TARGET AUDIENCE

All Quality Management QVD employees involved in audit activities.

1 DEFINITIONS

- 1.1 Call Book – a Microsoft Excel master reference file used to document and electronically store types of QVD audit-related NC calls
- 1.2 Call Code – the alpha-numeric code assigned to a specific NC call code
- 1.3 Call Code Request – the designated sheet or tab in the Excel workbook used to request or propose a new NC call
- 1.4 Call Description – specific verbiage describing the exact details of the NC finding/call
- 1.5 Call Theme – a category designation assigned to each NC call to enable grouping of related NC calls, typically used for the reporting phase
- 1.6 Call Type – DR, OH, UG, or Other (see acronym list below for call type definitions)
- 1.7 Reference – the specific standard/policy/procedure or series thereof, assigned to each NC call to enable legitimization of the NC call
- 1.8 Serial # – the chronological numeric designation of a specific NC call code
- 1.9 Acronyms found in or related to the Call Book:
 1. ACSR – Aluminum Conductor Steel Reinforced: A type of wire/conductor used at PG&E and other utilities
 2. AWAC – Alumoweld-Aluminum Conductor: A type of secondary service wire/conductor used at PG&E and other utilities

Electric Quality Verification Distribution Audit Procedure

Appendix E, QVD NC Call Book: Updating and Maintaining

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3. CPUC – California Public Utilities Commission: The State Agency that regulates how utility work is performed within the state of California
4. DB – Direct Burial cable
5. DR – Documentation Record: used to identify all QVD document/record type NC calls
6. EC – Electric Corrective: A type of notification created and stored in SAP to document repair work needed for a specific electric distribution asset
7. EDPM – Electric Distribution Preventive Maintenance manual: PG&E’s internal document for inspection standards and requirements
8. EM – Emergency Work
9. ER – Electric Reliability: A type of notification created and stored in SAP to document repair work needed for a specific electric distribution asset
10. FDA – Facility Damage Action: The code used for electric notifications to classify the type of repair work needed for the specified asset
11. GO – General Order: refers to specific CPUC regulatory electric construction and inspection requirements
12. IF – Idle Facility: A code used to designate electric assets/facilities as idle or not in use
13. KV or kV – Kilovolt or 1,000 volts
14. LAN ID – Local Area Network Identification: A unique 4-digit code used to identify PG&E employees
15. NC – Nonconformance: An audit finding that represents a violation of a policy, procedure, or standard
16. NCOA – Notification Completed on Arrival: A code used when cancelling a notification
17. NC – Nonconformance: An audit finding that represents a violation of a policy, procedure, or standard
18. NCOA – Notification Completed on Arrival: A code used when cancelling a notification
19. NOCR – No Compelling or Regulatory Condition Exists: A code used when cancelling a notification

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Appendix E, QVD NC Call Book: Updating and Maintaining

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20. OBS – Observation: used to identify all QVD audit conditions that represent a concern that is not a violation of a policy, procedure, standard, or other applicable legal or regulatory requirement; observations are typically an opportunity for improvement
21. OCM – Overhead Construction Manual: PG&E’s internal document for OH construction standards and requirements
22. OH – Overhead: used to identify all QVD Overhead/above ground type NC calls
23. P/I – Patrols/Inspection
24. PVC – Polyvinyl Chloride: a type of plastic used for pipes that carry wire/conductor.
25. SAP – Systems Applications and Products: a widely-used enterprise resource planning (ERP) software; SAP creates a centralized system for PG&E that enables every department to access and share common data to create a better work environment for employees
26. SCADA – Supervisory Control and Data Acquisition: a type of control system designed to collect data from industrial equipment
27. UCM – Underground Construction Manual: PG&E’s internal document for UG construction standards and requirements
28. UG – Underground: used to identify all QVD underground type NC calls

2 Updating Instructions

2.1 Required Approval

1. The call book **MUST NOT** be updated or edited unless prior approval is received from the QVD Supervisor or Lead Specialist designated to manage the call book
2. Any update or modification, no matter how minor, **MUST** be recorded in the “Version History Tab”

2.2 Editing the File

1. The call book **SHALL** be updated annually (at a minimum)
 - a. The QVD Supervisor or Lead Specialist designated to manage the call book may schedule more frequent updates as needed
2. **DO NOT** work/edit the master SharePoint version of the file

Electric Quality Verification Distribution Audit Procedure

Appendix E, QVD NC Call Book: Updating and Maintaining

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3. Download an external copy of the file to perform the update/edits needed
4. Typical annual edits include but are not limited to:
 - a. Adding/removing specific NC call codes
 - b. Updating NC call references
 - (1) All references MUST be as specific as possible
 - c. Correcting typos, duplicate calls, or other errors
 - (1) IF any type of edit was made
 - (2) THEN the one who made the edit MUST record their name and date the edit was made in the designated section of the call book
5. Once all edits have been made, upload the new file, and archive the old file

3 Electronic Storage Location

- 3.1 Electronically store the current/updated revision of the call book in the appropriate [QVD SharePoint](#) folder designated by the QVD Supervisor or Lead Specialist designated to manage the call book

4 New Call Code Request

- 4.1 Before making a new request, VERIFY there is not an existing or similar call
- 4.2 If requesting a modification, include the original Call Code
- 4.3 In the Supporting Documents column: include reference manuals, document numbers, pages, drawing numbers, notes, and tables; all supporting document references MUST be as specific as possible
- 4.4 NOTIFY by email QVD Supervisor AND Lead Specialist designated to manage the call book
- 4.5 QVD Supervisor or Lead Specialist designated to manage the call book will then:
 1. Review the proposed/requested change
 2. Approve/Reject the change
 - a. If rejected, justification must be given to the one who proposed the change

Electric Quality Verification Distribution Audit Procedure

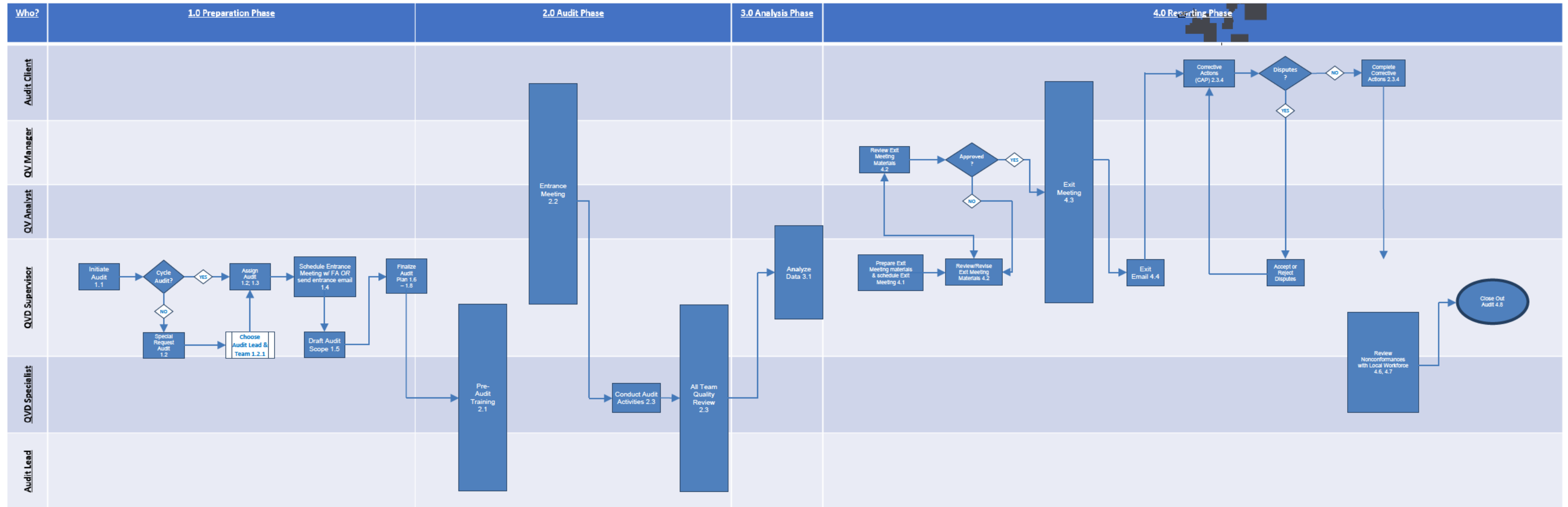
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- 4.6 Make approved change
- 4.7 Update the “Lead Entry Area” with the details of the change
- 4.8 Notify the requestor of the status and details of the change

End of Appendix E

Electric Quality Verification Distribution Audit Procedure

Appendix F, QVD Process Flow Chart
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Electric Quality Verification Distribution Audit Procedure

Appendix G, Quality Verification Overtime and Presentation/Meeting Request Guidance (Requesting/Approving OT and Presentation/Meeting Requests)

Page 1 of 1

NOTES:

1. Overtime (OT) is reserved for field work only. It is not intended for any record keeping, training, data entry, or similar office related activities/computer work.
2. All OT requests must be emailed to both/all QVD Supervisors.

Same Day Overtime (OT)

- Typically, OT is not permitted during a normal working day.
- An attempt should be made to complete all work and travel within the normal daily work schedules:
 - 4/10 schedule = 4 days of 10 hours each day, Friday is RDO (Regular Day Off)
 - 9/80 schedule = 4 days of 9 hours, Friday on is 8 hours, every other Friday RDO
 - 5/8 schedule = 5 days of 8 hours each day

EXCEPTIONS:

Unplanned Overtime

- On occasion, QVD Personnel may be granted permission to work OT on their normal workday if it makes economic sense to do so and is approved by the QVD Supervisor and QM Manager.
 - Example 1: The QVD employee has 1-2 locations left in the division to audit, the end of the day is approaching, and finishing up that day will save an extra trip to the field the following workday.
 - Example 2: The QVD employee has finished their field work and its near end of day for their normal shift. The employee may be granted permission to drive home on OT as opposed to staying another night in a hotel.

Pre-Arranged Overtime

- Pre-Arranged is working on an RDO.
- To be determined by QM Manager, Sr. Manager, or Sr. Director.

Public Safety Power Shutoff (PSPS) type events are typically R&Rs, so no OT

Major Events (Fire, storm, etc.)

- Occasionally QVD personnel have been asked to help assist in major events.
 - To be determined by QM Manager, Sr. Manager, or Sr. Director.

Not qualified for OT:

Presentation/Meeting Requests

- All requests to conduct a presentation or attend a meeting must have prior approval from QVD Supervisors and QM Manager.
 - QVD Personnel emails their supervisor with a request to conduct a presentation or attend a meeting.
 - QVD Supervisor to reply to e-mail request with approval or rejection.
 - If OT will be required for presentation, meeting, or travel, state the number of hours needed.
 - All OT requests will be evaluated and approved/rejected by the QM Manager.