

# Mutual Assistance Agreements Preparing in Advance for OQ Issues

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# Outline

- Mutual Assistance Agreements
- Code Requirements
- PHMSA Enforcement Guidance
- Challenges
- Active Agreements
- Recent Activity
- Discussion / Questions



# Mutual Assistance Agreements (MAA)

- What are they?
  - Agreements to either request or receive assistance
  - Governs the interactions of the Parties
    - Preparation and Mobilization of resources
    - Deactivation of Assistance
  - Clearly defines the obligations of the Parties
    - Costs
    - Payment
    - Liability
    - Audit and Arbitration
    - **Operator Qualifications**
    - Food and Lodging



# Mutual Assistance Agreements

- What's Not Covered:
  - When, or extent of Assistance
  - Non-Emergency Work Stoppages
  - Internal logistics



# MAA Operator Qualifications

- “Any Requesting Party for whom an OQ Program is required should pre-screen the other Parties to this Agreement to determine which Parties have compatible regulatory agency accepted programs and may therefore be contacted for assistance.”



# Code Requirements

- 49 CFR 192.805 – Operator Qualification Program
  - The program shall include provisions to:
    - (b) Ensure through evaluation that individuals performing covered tasks are qualified;
    - (c) Allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified;



# PHMSA OQ Enforcement Guidance

- Examples of a Probable Violation
  - An individual from another entity that performed covered tasks on behalf of the operator was not evaluated and qualified consistent with the operator's program requirements.
  - Operators do not review other programs from mutual assistance partners and qualifications for tasks to be performed during emergencies, to ensure consistency with their program requirements.



# SWG Operator Qualification Plan

- The Company may accept qualifications obtained under the OQ program of other operators and/or contractors with which the Company has a written Mutual Assistance Agreement, or when the following conditions have been met:
  - OQ program complies with 49 Part 192.801-809
  - The standards used for qualification are acceptable to the Company
  - A documented audit has been conducted of the operators program



# Challenges

- Consistency
- Administration of the Party's OQ plans

Quarterly reports to include:

- Emp ID# and names of qualified individuals
- Identification of covered tasks each individual is qualified to perform (cross referenced to Companies' covered task numbering system)
- Date(s) of current qualifications
- Identification of the method(s) by which the individual was qualified
- Dates(s) of re-qualification due



# Active Agreements

- SWG is party to the following agreements
  - California Utilities Emergency Association (CUEA)
    - 9 Parties to the Agreement
  - Western Region Mutual Assistance Agreement (WRMAA)
    - 35 Parties to the Agreement



# MAA Recent Activity

- Functional Exercise (WRMAA) – Sept. 29, 2010
- Goals & Objectives
  - Ensure understanding of the assistance process
  - Effectively activate the WRMAA
  - Identify improvements to the activation process
    - Operator Qualifications



# MAA Recent Activity (Continued)

- Activation of CUEA – Sept. 28, 2010
  - PGE – Requesting Parting
    - CPUC Leak Survey Mandate
  - Southwest – Assisting Party
    - 13 Employees
    - OQ Evaluations conducted prior to providing Leak Survey Assistance



Discussion / Questions?

