



Florida City Gas Operator Qualification Written Plan

Developed to ensure a qualified workforce in
compliance with 49 CFR Part 192, Subpart N

Covering:

- Florida City Gas

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Overview

Overview. The U.S. Department of Transportation regulations require operators to develop and maintain a written qualification program for individuals performing Covered Tasks. These regulations are detailed in Title 49 CFR 192, Subpart N: Qualification of Pipeline Personnel and are commonly known as Operator Qualification (OQ). The regulations are intended to promote safety and minimize human error by having qualified personnel who are able to perform work tasks safely and recognize and react to abnormal operating conditions.

The following documentation is the Operator Qualification (OQ) Plan for Florida City Gas, a subsidiary of Nextera Energy Inc. as of July 29, 2018.

This plan outlines the protocols which the operator will use to comply with minimum federal pipeline safety regulations as defined in 49 CFR Part 192, Subpart N. The plan is designed to ensure a qualified workforce with the goal of reducing the probability and consequence of incidents on the operator's pipeline facilities that may be caused by human error.

The plan will also ensure that all employees and contractors performing covered tasks for the operator have satisfied the requirements stated herein and are qualified to perform such covered tasks. The covered tasks will include such tasks as are currently identified and included in this plan and those tasks that might be added in subsequent modifications to the plan.

The qualification plan applies to all individuals (employees and contractors) who perform covered tasks on behalf of the operator.

Effective Date of the Plan. The effective date of the plan is April 27, 2001, with verification of the qualification of persons performing identified covered tasks to be in place no later than October 28, 2002.

Sources. The information contained herein is assembled from data gathered from the following sources:

- Florida City Gas
- DOT Final Rule, 49 CFR Part 192, Subpart N, published August 27, 1999

Program Responsibilities

Reference: 192.605 (a), 192.805 (d), 192.805 (e)

Operator Qualification Administrator. The Operator Qualification Administrator will have the following responsibilities:

1. Act as liaison with internal and external entities, including contractors and regulatory bodies.
2. Ensure qualification of operator and contractor employees on designated covered tasks.
3. Maintain and update the operator's qualification plan. In accordance with Part 192.605 (a), Florida City Gas' OQ written plan will be reviewed at intervals not exceeding 15 months, but at least once each calendar year.
4. Develop methods of qualifying individuals on various covered tasks.
5. Maintain an updated list of covered tasks.
6. Maintain qualification data.
7. Communicate changes that may impact how a covered task is performed.
8. Provide or coordinate the provision of training workshops for evaluators to ensure objectivity and consistency.

Operator Qualification Task Committee. This ad-hoc committee will be chaired by the Operator Qualification Administrator and will have the following responsibilities:

- Periodic reviews of the plan to ensure compliance by employees and contractors
- Identify new operating procedures, policies, regulations, equipment, pipeline material, processes etc., that may affect covered tasks and the qualification of individuals performing them
- Determine qualification requirements of covered tasks and methods of evaluation

The committee may include but not be limited to at least one representative from each department that is responsible for the following: operations or maintenance activities, engineering activities and training activities. It may also include other members as needed based on their expertise and the needs of the committee.

Field Operations Responsibilities. Field Operations management and supervision will be responsible to do the following:

1. Identify which employees perform designated covered tasks.
2. Ensure that covered tasks are only performed by qualified operator or contractor employees or are directed and observed by an individual who is qualified and can take corrective action immediately if necessary.
3. Maintain qualification records according to established requirements.

4. Administer appropriate evaluations for qualification to perform covered tasks when required.
5. Enter evaluation results in tracking system.
6. Determine if an individual remains qualified to perform a task based on the requirements of sections 192.805(d) (Performance Contributing to an Incident) or 192.805(e) (Reasonable Cause to Verify Qualification).
7. Monitor employee qualifications and assign work tasks to maintain compliance.

Evaluators. The evaluator shall be the sole individual to determine if an individual has successfully completed a performance type evaluation.

Evaluators shall be selected based on technical knowledge and capability to ascertain an individual's Knowledge, Skill and Ability (KSA's) during the evaluation and recognize and react to an Abnormal Operating Condition (AOC).

Such evaluators will be responsible for the following:

1. Evaluate the qualification of individuals performing covered tasks.
2. Document evaluation results in tracking system.
3. Ensure notification of management regarding training needs to ensure operator and contractor employees have the knowledge and skills necessary to perform designated covered tasks.
4. Notify supervision if an employee(s) unsuccessfully completes an evaluation.

Program Effectiveness

The Operator Qualification Administrator performs a number of activities that provide feedback related to program effectiveness. The following are some of the activities:

- **Operator Qualification Task Committee:**

This ad-hoc committee consisting of internal and external subject matter experts provides feedback to Operator Qualification Administrator regarding potential program changes. This is described in [Program Responsibilities](#).

- **Reasonable Cause to Verify Qualification:**

Data is collected concerning events which result in disqualification of employees. This is described in [Reasonable Cause to Verify Qualification](#).

- **Audits:**

Florida City Gas, through various means, conducts field reviews of employee job performance and OQ evaluator performance. This is described in [OQ Audits](#).

- **OQ Plan Review:**

Operator Qualification Administrator periodically reviews and modifies the Florida City Gas Operator Qualification written plan to ensure the plan is kept current with internal and external requirements. This is described in [Program Responsibilities](#).

- **Corrective Action Plan and Implementation:**

Any nonconformance with regulatory requirements or Company standards or procedures identified from audits or plan review will have one or combination of corrective actions that will address the issue and prevent it from reoccurring in the future.

Some corrective actions may include:

- Updating procedures to provide additional detail and guidance
- Providing additional training for individuals
- Implementing additional safety barriers (equipment, process steps, job briefings, OQ)
- Developing additional Performance Metrics
- Introducing new technology to reduce human error
- Disciplinary action

OQ Audits

The following elements outline the audit process for the Florida City Gas operator qualification plan:

An audit of OQ records and simulated props will be performed at each Florida City Gas facility. The audit will take place as part of a scheduled rotation of Florida City Gas Company facilities.

An audit of OQ records and simulated props will be performed at all Florida City Gas contractor locations. The audits will take place as part of a scheduled rotation of all Florida City Gas contractors.

Evaluator performance audits will be conducted periodically at all Florida City Gas and contractor facilities.

Additional audits will be conducted periodically by Company representatives to ensure employees and contractors are performing covered tasks according to the Florida City Gas Operations Procedure Manual (OPM) and OQ qualification procedures.

Veriforce is the vendor for storing Florida City Gas OQ records which continuously conducts audits of documentation submitted as well as verifications of employee and contractor qualifications.

Reports will be periodically generated and reviewed as a part of the audit process for maintaining qualification compliance.

Operator Qualification Administrator will retain results of all OQ audits conducted within the department. OQ-related audits conducted by other Company departments will also be available for review upon request.

Training

Florida City Gas has mandated that all individuals (employees and contractors) shall receive a Self-Study/Training guide prior to an OQ evaluation based on the following:

- Initial qualification 72 hours minimum prior to being evaluated
- Subsequent re-qualifications 24 hours minimum prior to being evaluated

These minimum periods of study are not required if relevant instructor-led training is provided prior to administration of the OQ evaluation.

Training for new Florida City Gas employees and contractor employees shall be provided in order to allow employees the opportunity to gain the knowledge, skills and ability to successfully complete the covered task evaluation.

Types of training may include, but are not limited to:

- Self-Training/Study Guides
- Instructor-Led Training (ILT)
- Computer Based training (CBT)
- On the Job training (OJT)
- Other types of training that may not be identified, but approved by Operator Qualification Administrator prior to acceptance.

Additional training may be provided for individuals who have demonstrated difficulty in successfully completing the evaluations or have had a Reasonable Cause completed against their qualification(s).

Definitions

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

Construction: Work performed to establish a new pipeline. This definition includes pipeline system expansion that extends service to a new customer or increases capacity for existing customers.

Corrective Action is an improvement or series of improvements to Company's business processes and procedures to correct the root cause(s) of a nonconformance and to prevent their recurrence. It is the mechanism that drives continuous improvement.

Covered Task: An activity identified by the operator that meets the four-part criteria established by 49 CFR Part 192, Subpart N and Florida City Gas. The established criteria are:

- Is performed on a pipeline facility
- Is an operations, maintenance or new construction task
- Is performed as a requirement of 49 CFR Part 192
- Affects the operation or integrity of the pipeline

Direct and Observe: The process by which a qualified individual oversees the work activities of a non-qualified individual(s) and is able to take immediate corrective action when necessary.

Evaluation: A process established and documented by the operator, to determine an individual's ability to perform a covered task by any of the following:

- a. written examination (including computer-based)
- b. oral examination
- c. computer-based training (CBT)
- d. work performance history review

Note: work performance history review may not be used as a sole evaluation method after October 28, 2002

- e. observation during
 - a. performance on the job
 - b. on-the-job training (OJT)

Note: observation of on-the-job performance may not be used as the sole evaluation method after December 16, 2004

- f. simulation (classroom, on-the-job, or computer)
- g. other forms of assessment

Incident: The following definition appears in 49 CFR Part 191.3. Incident means any of the following events:

1. An event that involves release of gas from a pipeline, or of liquefied natural gas, liquefied petroleum gas, refrigerant gas, or gas from an LNG facility, and that results in one or more of the following consequences:
 - i. A death, or personal injury necessitating in-patient hospitalization;
 - ii. Estimated property damage of \$50,000 or more, including loss to the operator and others, or both, but excluding cost of gas lost;
 - iii. Unintentional estimated gas loss of three million cubic feet or more;
2. An event that results in an emergency shutdown of an LNG facility. Activation of an emergency shutdown system for reasons other than an actual emergency does not constitute an incident.
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) of this definition.
4. In Florida:
 - i. Caused estimated damage to the property of the operator, or others, or both, of a total of \$10,000 or more.
 - ii. Required taking of any segment of transmission pipeline out of service.
 - iii. Resulted in gas igniting.
 - iv. The Company shall immediately report to the Commission any distribution system-related accident or failure which interrupts service to either 10% or more of its meters or 500 or more meters.
 - v. The Company need not give notice of an event that met only the criteria of (ii) or (iii) above, if it occurred solely as a result of, or in connection with, planned or routine maintenance or construction.

Initial Qualification: Qualification at any time of individuals who were not performing a covered task on a regular basis prior to the effective date of the rule.

Integrity of the Pipeline: The pipeline's ability to operate safely and to withstand stresses imposed upon it during operation.

Maintenance: Work performed on an existing pipeline to ensure the continued use and serviceability of existing pipelines.

Mutual Assistance: Pipeline operator personnel assistance (aid) provided to another pipeline operator in the performance of covered tasks.

Non-Qualified: A term that denotes an individual who has not been evaluated **or** has been evaluated but is not qualified for a specific covered task due to the inability to perform both the specific covered task and to recognize and react to the abnormal operating condition(s) associated with that task.

Pipeline: All parts of those physical facilities through which gas moves in transportation, including pipe, valves, and other appurtenance attached to pipe, compressor units, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies.

Pipeline facility: New and existing pipelines, rights-of-way, and any equipment, facility or building used in the transportation of gas or in the treatment of gas during the course of transportation.

Qualified: A term that denotes an individual who has been evaluated and can perform assigned covered tasks and recognize and react to abnormal operating conditions.

Significant Change: A change in operational procedures, regulations or equipment that warrants an immediate notification and re-qualification of all individuals qualified to perform the affected covered task.

Span of Control: The number of nonqualified individuals who can perform a task under the direction and observation of a qualified individual, expressed as a ratio: qualified to non-qualified personnel.

Subsequent Qualification: Qualification of an individual performing a covered task after transitional or initial qualification at intervals established by the operator.

Transitional Qualification: Qualification of an individual who was performing covered tasks on a regular basis prior to the effective date of the Final Rule on October 26, 1999.

Work Performance History Review: A review of existing records for documentation of an individual's past satisfactory performance of a covered task(s), verification that the individual's work performance history contains no indications of substandard work or involvement in an incident caused by an error in performing a covered task, and verification that the individual has successfully performed the covered task on a regular basis prior to the effective date of the Final Rule on October 26, 1999.

Mutual Assistance

In the event of major natural disasters or other emergencies, an operator may require assistance from employees or contractors/subcontractors of another operator. These individuals may be required to perform Covered Tasks. To allow such mutual assistance without violating Title 49 CFR 192, Subpart N, as well as applicable state regulations:

Florida City Gas will review the OQ plan(s) from other entities and approve the scope and qualification processes used to ensure the operator's OQ plan meets Florida City Gas' OQ plan and procedures prior to any individuals performing a covered task. All individuals that are providing mutual assistance will work under directed and observed guidance of a qualified individual until such time that Florida City Gas approves the operator's or vendor's OQ plan and qualification procedures.

In the event that Florida City Gas provides mutual assistance to other operators, the operator shall enter into an agreement indicating that Florida City Gas' OQ plan has been reviewed and find it acceptable to the standards of their OQ plan in advance of any covered task functions being performed on their pipeline. All Florida City Gas employees who may be called upon to provide mutual assistance shall be directed and observed by a qualified individual until such time that Florida City Gas' OQ plan is approved by the operator having jurisdiction over the pipeline.

Mergers and Acquisitions

As part of a merger or acquisition of another gas operator that operates under 49 CFR Part 192 by Florida City Gas, prior to the integration of OQ programs there shall be a review and comparison of its Operator Qualification (OQ) plan to ensure that at a minimum it meets or exceeds that of Florida City Gas' OQ plan. The review process will include verifying qualification processes for all covered tasks, covered task list, documentation process for qualifications, training, record keeping and all other relevant components related to the OQ plan.

If, during the review of the operator's OQ plan, there are identified deficiencies in its plan, all deficiencies will be addressed prior to the integration of the OQ programs.

After a merger or acquisition has been completed, if the Company determines the OQ programs will be integrated, the operator's employees will be required to re-qualify under Florida City Gas' OQ program within a designated time frame.

Florida City Gas will revise its OQ program and covered task list to add any needed covered task of the merged or acquired operator if they do not already exist in Florida City Gas' covered task list and the OQ programs will be integrated.

Identify Covered Tasks

Reference: 192.805(a)

The operator has identified covered tasks which may be performed on its pipeline facilities. The four-part criteria used to identify the covered tasks are as follows:

1. Performed on a pipeline facility.
2. Is an operations, maintenance or new construction task.
3. Is performed as a requirement of 49 CFR Part 192, Subpart N.
4. Affects the operation or integrity of the pipeline.

Modifications to the covered task list may be made at the discretion of the operator.

The operator will notify each contractor of any covered tasks, as identified by the operator and defined in 49 CFR Part 192, Subpart N, that are a part of work activities performed by the contractor on behalf of the operator. The notification will provide that these covered tasks can only be performed by an individual who is qualified, or who is direct and observed by an individual who is qualified to perform the covered tasks and who can recognize and react to abnormal operating conditions.

Although Subpart N of Title 49 CFR Part 192 does not specifically address new construction activities as a Covered Task, Florida City Gas believes it is sound practice to require that construction activities be performed by qualified personnel and subsequently construction of pipelines, including construction or repair activities associated with the maintenance of such pipelines, is considered a Covered Task by Florida City Gas.

Covered tasks are identified in [Appendix A](#).

Evaluation of Qualifications

Reference: 192.805(b), 192.809

Types of Qualifications

The OQ rule defines three types of qualifications. They are transitional, initial, and subsequent.

Transitional Qualification – Qualification of individuals who were performing one or more covered tasks on a regular basis prior to the effective date of the rule (October 26, 1999), and who will be qualified prior to October 28, 2002.

Initial Qualification – Qualification of individuals who were not performing a covered task on a regular basis prior to the effective date of the rule (October 26, 1999).

Subsequent Qualification – Evaluation of an individual's qualifications after transitional or initial qualification at the interval established by the operator.

Methods of Evaluation

Each individual who is expected to perform a covered task will be evaluated using one or any combination of the following methods.

- Written examination (including computer-based)
- Oral examination (including virtual web-based meeting software)
- Computer-based training (CBT)
- On-the-job training (OJT)
- Simulation (classroom, on-the-job, or computer)
- Other forms of assessment
- Work performance history review
Note: work performance history review may not be used as a sole evaluation method after October 28, 2002
- Observation during performance on-the-job, with evaluator interaction
Note: observation of on-the-job performance may not be used as the sole evaluation method after December 16, 2004

Evaluations will be used to verify whether the individual has the knowledge and skills to perform the covered tasks and to recognize and react to abnormal operating conditions.

- All performance evaluations are conducted as a one-on-one evaluation.

- Non-performance evaluations (written) may be given in a classroom type setting with multiple evaluations of a single task being conducted at one time.

Each covered task hands-on evaluation contains questions relating to the requirements of that specific task. This segment of the evaluation is communicated verbally (orally) to individuals being evaluated. Therefore, all evaluations **excluding written evaluations** will be considered to include oral examination as part of the overall method of evaluation.

Oral examination is a written examination administered orally. Written evaluations **shall not** be administered orally **unless** there is a literacy issue involved. If a written evaluation must be administered orally, Operator Qualification Administrator shall be notified by E-Mail prior to the evaluation being administered. This E-Mail shall be addressed to the Operator Qualification E-Mail box FCGOperatorQualification@nexteraenergy.com or Sergey.Peschanyy@nexteraenergy.com.

Observation of on-the-job performance may not be used as the sole method of evaluation after December 16, 2004

Work performance history may be used as a sole evaluation method for individuals performing covered tasks prior to October 26, 1999.

Work performance history may not be used as the sole qualification method after October 28, 2002

Should Florida City Gas decide to use work performance history it may only be used as an enhancement to other evaluation methods as appropriate.

Florida City Gas requires all individuals to be qualified through the established evaluation methods of its OQ plan.

Evaluators. Evaluators are those individuals who evaluate the performance of the individuals who are expected to perform and obtain qualification(s) for a covered task(s) if conducting evaluations on the job. The operator will ensure that its evaluators:

- Have adequate knowledge of the task(s) to determine an individual's ability to properly perform covered tasks;
- Have adequate knowledge of the task(s) to determine an individual's ability to recognize and react to abnormal operating conditions that might be encountered while performing those tasks; and are objective and fair in their evaluations of individuals.
- Are qualified in the task(s) if conducting on the job evaluations or re-evaluations.

Evaluators are prohibited from conducting evaluations involving their relatives.

Externally-Qualified Individuals: Individuals qualified to perform covered tasks through an external organization's OQ program may be allowed to perform those covered tasks on Company facilities as a qualified individual if the following criteria are met:

- The external OQ program is reviewed and its procedures are determined to be acceptable to Company standards by the Operator Qualification Administrator.
- Documentation is provided to Florida City Gas that the individual's certifications under the external program are in compliance at the time covered tasks are being performed.
- If the covered task being performed is not already an identified Florida City Gas OQ covered task, it will be added to the Florida City Gas OQ covered task list.
- If the Company observes reasonable cause to verify the individual's qualification, this fact will be communicated to the external OQ program's administrator and the individual will stop performing the covered task on Company facilities until their qualification status has been established.
- Veriforce Operator Qualification Common Covered Tasks have been reviewed and have been found acceptable in conjunction with Company approved operating procedures.

Non-Qualified Individuals

Reference: 192.805(c)

Non-qualified individuals **may** be used to perform covered tasks provided they are directed and observed by a qualified individual while performing those tasks. All new employees that have not had the evaluations and qualifications shall work under the directions and observance of a qualified individual until they have successfully completed the covered task evaluation. For purposes of this plan, direct and observed means that a qualified individual must be at the work site, be able to recognize and react to an abnormal operating condition and be able to take immediate corrective action.

All qualified individuals who will be performing direct observance of non-qualified individuals must remain in direct visual and verbal contact at all times and be able to verbally communicate in an effective manner to all non-qualified individuals being directed and observed by them.

The qualified individual must have the following responsibilities and authorities:

- a) The responsibility to intervene if the task is being performed improperly and the ability to take immediate corrective action if necessary
- b) Complete responsibility for proper and safe performance of the Covered Task by the non-qualified individual
- c) The authority to dismiss the non-qualified individual from performing a particular Covered Task due to inability to perform the Covered Task as directed
- d) The responsibility to consider the following before allowing a non-qualified individual to perform a Covered Task under direction and observation:
 - (1) External factors, such as weather, noise, ground conditions, and obstructions
 - (2) Span of control requirements
 - (3) Circumstances unique to the non-qualified individual, such as training, experience, and any prior work performed under direction and observation.

The maximum ratio of non-qualified to qualified individuals for each covered task is listed in [Appendix A](#) of this plan.

Performance Contributing to an Incident

Reference: 192.805(d)

If an operator has reason to believe that an individual's performance of a Covered Task contributed to an incident as defined in Title 49 CFR Part 191, Section 191.3, the individual must be evaluated prior to continuing the performance of the Covered Task.

If during the investigation, it is determined that incident occurred as a result of the performance of any Covered Task(s), the Operator should perform the following:

- a) Identify the Covered Task(s) being performed prior to the incident and the person(s) performing the Covered Task.
- b) Confirm that each person's Operator Qualification status is current. If an individual is not currently qualified, the Operator shall determine the name of the Qualified Person who was supervising the non-qualified individual performing the task and/or determine why this situation existed.
- c) Review the Covered Task for deficiencies that may have contributed to the incident. These may include but are not limited to review of the qualification evaluation method, procedures, processes, and training. Any deficiencies discovered by the review should be remedied as soon as reasonably possible and communicated in accordance with "Management of Change" Section.
- d) If no deficiencies are identified in Section (c) above, any individual(s) performing the Covered Task *and* directly involved in the incident shall not continue to perform the Covered Task unless Section (e) below has been completed.
- e) The Operator shall provide the opportunity for the individual to re-establish his/her qualifications to perform the Covered Task. This can be accomplished by using one or more of the evaluation methods listed in "Evaluation of Qualifications" Section. If the individual passes the evaluation, he/she shall be permitted to continue to perform the Covered Task. If the individual does not pass the evaluation, the individual shall be considered non-qualified.
The individual shall not perform the covered task(s) unless he or she is directed and observed by a qualified individual or until he or she has successfully re-qualified for the covered task(s) involved. An individual who has been disqualified due to a Special Cause may be re-evaluated in accordance with the plan after a minimum **24-hour period**.

Any required re-evaluation will be made a part of the individual's qualification records.

Reasonable Cause to Verify Qualification

Reference: 192.805(e)

An operator is required to evaluate an individual or group of individuals if that operator has reason to believe the individual(s) is no longer qualified to perform a Covered Task.

Upon the determination of reasonable cause, the operator will investigate an individual's ability to perform a covered task.

Such causes may include but not be limited to:

- Change in an individual's physical abilities related to performance of the covered task.
- Documented statement(s) from the individual or other person(s) relative to the individual's inability to perform the covered task.
- Prolonged period of non-performance of the covered task.
Florida City Gas' OQ written plan identifies "prolonged period of non-performance of the covered task" as a reasonable cause to verify qualification of an individual. A period of 12 to 15 consecutive months defines a prolonged period. Therefore, individuals who do not perform a specific task in a 12 to 15 consecutive month period may be evaluated in accordance with the plan or shall be removed from the list of qualified individuals for that task. **Local management will be responsible for monitoring and ensuring compliance with this section.**
- Documented unsatisfactory performance of the covered task.

If during the investigation it is determined that the actions, probable actions or the physical ability of an individual may have contributed to the Special Cause, Florida City Gas shall immediately suspend the individual's qualifications for the identified covered task(s) involved in the incident or other reasonable cause situation. The individual shall not perform the covered task(s) unless he or she is directed and observed by a qualified individual or until he or she has successfully re-qualified for the covered task(s) involved. An individual who has been removed due to a Special Cause may be re-evaluated in accordance with the plan after a minimum **24-hour** period.

Additional training or retraining may be provided for individuals who have had a Reasonable Cause completed against their qualification(s) prior to re-qualifying.

A Special Cause Verification Form (SCVF) shall be used to document any special cause that may disqualify an individual from performing a covered task.

Operator Qualification Administrator will determine if other possible causes (outside of those identified above) may exist are within the scope of Florida City Gas' OQ written plan. Additional documentation as needed or if requested should be transmitted along with the SCVF to Operator Qualification Administrator.

Management of Change (MOC)

Reference 192.805(f), 192.805(i)

This section establishes provisions for communicating information on significant changes to the OQ Program in accordance with Title 49 CFR Part 192, Section 192.805(f) and 192.805(i).

Some changes may impact how a covered task is performed. These changes may include but are not limited to the following:

- Modifications to operator policies or procedures;
- Changes in state or federal regulations;
- Utilization of new equipment, materials, and/or technology;
- OQ Plan continuous improvement efforts (regulatory audit findings, QA/QC findings, and company internal audit assessments, etc.) and
- New information from equipment or product manufacturers.

When changes are identified, they must be evaluated to determine their significance.

Rating the impact of change

Low

Medium

High

Low impact requires no documentation change communication which may include changes made to the OQ program or covered task qualification process which have no or little impact such as grammatical additions or corrections.

Medium impact requires documented notification to affected individuals before change is implemented. Changes may include revisions to administrative procedures, evaluation methods, company procedures or other items that may affect the implementation of the qualification program, but do not require training or reevaluation of qualified individuals.

High impact requires documented communication of change to affected individuals before the change is implemented. High impact changes are those that affect the knowledge or skills required to perform a covered task or the knowledge to implement qualification requirements. Affected individual may have to be trained or re-qualified on high impact changes.

When appropriate, the operator will communicate changes in verbal, written or electronic format to individuals performing covered tasks. All communication of changes will be accompanied by appropriate written documentation that the affected individuals have received notification of the changes.

When significant changes occur that impact specific covered tasks, additional qualification requirements will be addressed, including if necessary the requalification of individuals performing the specific covered tasks.

Revisions will be documented and on file with Operator Qualification Administrator. Changes to any part of the OQ program will be communicated to responsible individuals and evaluators. Changes will be identified by revision dates on appropriate documentation. All originals and revisions will be retained by Operator Qualification Administrator.

All applicable state or federal regulatory agencies will receive written notification (electronically or via regular mail) of significant changes made to Florida City Gas' OQ plan. A communication of change document summary will also be sent along with the updated plan identifying changes or updates.

Evaluation Intervals

Reference: 192.805(g)

Evaluation intervals for covered tasks were determined by the operator and are based on the following criteria:

- Difficulty / Complexity of the Covered Task
 - (1) High
 - (2) Medium
 - (3) Low
- Importance / Level of Risk or consequences of improper performance of the Covered Task
 - (1) High
 - (2) Medium
 - (3) Low
- Frequency of performing the Covered Task
 - (1) High – 0-6 months
 - (2) Medium – 6-12 months
 - (3) Low – 12 or more months
- Statutory requirements

A Difficulty, Importance, Frequency (DIF) scale was used to determine the re-evaluation interval for Florida City Gas' covered tasks. In addition to DIF scale rating average, some tasks may have qualification interval modified to a more frequent cycle based on Subject Matter Expert knowledge and Company experience.

Task Number	Task Name	Difficulty/Complexity of Task	Importance / Level of Risk	Frequency of Performance	Rating Average	Qualification Intervals/Year
001A	Abandonment and Deactivation of Facilities	2	2	2	2	5
001B	Abandonment and Deactivation of Facilities (service line not in use)	2	2	2	2	5
001C	Abandonment and Deactivation of Facilities (service line not in use) X-Pander Pipeline Plug	2	2	2	2	5
001SUBA	Pipeline Shutdown, Startup or Pressure Change Plastic	2	3	3	2.6	5
001SUBB	Pipeline Shutdown, Startup or Pressure Change Steel	2	2	2	2	5
001SUBC	Pipeline Shutdown, Startup or Pressure Change Cast Iron	3	3	1	2.3	5
003A	Cathodic protection testing (pipe-to-soil)	2	3	1	2	3

003B	Cathodic protection testing (pipe-to-soil) Survey Contractors	2	3	1	2	3
004A	Damage Prevention Inspection	1	2	1	1.3	1
004B	Damage Prevention Inspection (Excavation)	1	2	1	1.3	1
005A	External Corrosion Control: corrosion control - atmospheric	3	3	1	2.3	5
005B	External Corrosion Control: corrosion control - Atmospheric Meter Sets	3	3	1	2.3	5
005C	External Corrosion Control: corrosion control - Atmospheric Survey Contractors	3	3	1	2.3	5
006A	External Corrosion Control: evaluation of exposed pipe	2	3	1	2	3
007A	External Corrosion Control: Operation of Short Locator, Tinker and Razor Pipe Detector (PD)	3	3	1	2.3	5
007B	External Corrosion Control: Operation of Short Locator, Radiodetection Pipeline Current Mapper (PCM)	3	3	1	2.3	5
007C	Operation of Current Interrupter	1	2	2	1.6	3
007D	Conducting Interference Testing	1	2	2	1.6	3
007E	Rectifier Inspection and Operation	1	2	2	1.6	3
007F	Electrical Isolation Testing	1	2	2	1.6	3
007G	Inspecting for a Shorted Casing	1	2	2	1.6	3
008A	External Corrosion Control: Inspection and Application of Coating	1	2	2	1.6	3
008B	External Corrosion Control: Inspection and Application of Coating Epoxy Coating	1	2	2	1.6	3
008C	External Corrosion Control: Inspection and Application of Coating Composite Wrap	1	2	2	1.6	3
008D	Inspection of Coating by Jeeping	2	2	1	1.6	3
008E	Inspection and Application of Composite Wrap (Clock Spring Composite Wrap)	1	1	1	1	1
008F	Inspection and Application of Composite Wrap (Clock Spring Contour Composite Wrap)	1	1	1	1	1
008G	Inspection and Application of Composite Wrap (Black Diamond Composite Wrap)	1	1	1	1	1
009A	External Corrosion Control: Installing Test Leads (Test Stations)	2	2	3	2.3	5
009B	Installation of Zinc Ribbon for AC Mitigation	2	2	3	2.3	5
018A	EFV Installation	2	2	2	2	5
019A	Hazard Control	2	2	2	2	5
020A	Increase System Pressure (Uprating)	1	1	3	1.6	3
021A	Inspection of Plastic Pipe	3	2	1	2	5
022A	Inspection of Steel Pipe	3	2	1	2	5
023A	Installation and Maintenance of Line Markers	3	2	2	2.3	5
024A	Installation of Customers' Meters and Regulators	2	2	1	1.6	3

024B	Installation of Customers' Meters and Regulators (Meter Express)	2	2	1	1.6	3
025A	Installation of Plastic Pipe	2	2	1	1.6	3
025B	Installation of Plastic Pipe (Boring Process)	2	2	1	1.6	3
026A	Installation of Steel Pipe	2	2	1	1.6	3
027A	Installation of Support and Anchors	1	2	2	1.6	3
028A	Installing, Operating, Inspecting & Testing Pressure Limiting Devices	1	2	2	1.6	3
028B	Installing, Operating, Inspecting & Testing Pressure Limiting Devices (Residential and Commercial)	1	2	2	1.6	3
028C	Residential Regulators and Building Wall regulator Stations	1	2	2	1.6	3
028D	SCADA Pressure Control	1	2	2	1.6	3
029A	Internal Corrosion Control	2	2	2	2	5
030A	Joining Plastic and Steel Pipe by Mechanical Means	2	1	1	1.3	1
032A	Leak investigation	1	1	1	1	1
032B	Leak Investigation Propane	1	1	1	1	1
032C	Leak Investigation (Survey Contractors)	1	1	1	1	1
032D	Inside Leak Investigation	1	1	1	1	1
032E	Above Ground Leak Investigation and Repair	1	1	1	1	1
032F	Leak Investigation Medium BTU Landfill Gas Pipelines	1	1	1	1	1
032G	Leak Investigation Including GPS Tracking	1	1	1	1	1
033A	Leak Repair: Includes Use of Pit Depth Gauge	1	1	1	1	1
033B	Leak Repairs Above Ground Leak Repair Including Replacement of Service Valve	1	1	1	1	1
033C	Leak Repairs Above Ground Leak Repair Excluding Replacement of Service Valve	1	1	1	1	1
033D	Leak Repairs Medium BTU Landfill Gas Pipelines	1	1	1	1	1
033E	Leak Repairs Above Ground Leak Repair by Tightening (Survey Contractor)	1	1	1	1	1
034A	Leak Survey	2	2	1	1.6	3
034B	Leak Survey Propane	2	2	1	1.6	3
034C	Leak Survey (Survey Contractors)	2	2	1	1.6	3
034D	Leak Survey Medium BTU Landfill Gas Pipelines	2	2	1	1.6	3
037A	Nondestructive Testing of Welds	1	1	2	1.3	1
038A	O&M of Cast Iron Pipe	1	2	3	2	5
039A	O&M of Copper Pipe	1	2	3	2	3
040A	O&M of Propane Air Peak Shaving Facilities	1	2	2	1.6	3
041A	Odorant Sampling Odorator	1	2	2	1.6	3
041B	Odorant Sampling Odorometer	1	2	2	1.6	3
041C	Odorant Sampling DETEX DX 1000GL	1	2	2	1.6	3

041D	Odorant Sampling Medium BTU Landfill Gas Pipelines	1	2	2	1.6	3
042A	Operation of pipeline components by system control	2	2	1	1.6	3
042B	Operation of Pipeline Components by System Control (Compressor Station)	2	2	1	1.6	3
043A	Patrolling Pipelines	3	2	2	2.3	5
043B	Patrolling Pipelines Aerial	3	2	2	2.3	5
043C	Patrolling Pipelines (Under Water)	3	2	2	2.3	5
044AA	Pipe Locating and Marking All Conventional Equipment	2	1	1	1.3	1
044L	Pipe Locating and Marking (Generic GPR)	2	1	1	1.3	1
044M	Pipe Locating and Marking (Gas Tracker)	2	1	1	1.3	1
045A	Pressure Testing Lines	2	2	1	1.6	3
046A	Purging of Pipelines	2	2	1	1.6	3
046B	Purging of Pipelines Propane	2	2	1	1.6	3
046C	Purging of Pipelines Service Riser	2	2	1	1.6	3
046D	Purging of Pipelines Medium BTU Landfill Gas Pipeline	2	2	1	1.6	3
051A	Tapping Steel Pipe 1/2"-2 1/2"	1	2	2	1.6	3
051B	Tapping Plastic Pipe	1	2	2	1.6	3
051C	Tapping Steel Pipe 3" and Above	1	2	2	1.6	3
051D	Tapping Self-Tapping	1	2	2	1.6	3
051E	Tapping Cast Iron	1	2	2	1.6	3
052A	Valve Inspection	2	2	2	2	5
053A	Vault Inspection and Maintenance	1	1	2	1.3	1
055A	Visual Inspection of Joining Materials other than Welding Heat Fusion	2	1	1	1.3	1
055B	Visual Inspection of Joining Materials other than Welding Electrofusion	2	1	1	1.3	1
056A	Welding	2	1	1	1.3	1
057A	Odorization	2	1	2	1.6	3
058A	Inspection of Copper Pipe	3	2	3	2.6	5
059A	Abnormal Operating Conditions AOCs	2	1	2	1.6	3
060A	Start Up and Shutdown of Compressor Station	2	2	1	1.6	3
061A	Drilling and Tapping of Meter Casing	3	1	3	2.6	5
062A	SCADA RTU Maintenance and Installation	2	1	2	1.6	3

Evaluation intervals for subsequent qualification are included in [Appendix A](#).

At Operator Qualification Administrator discretion evaluation intervals may be extended if personnel are affected by a severe environmental event like a hurricane, tornado, or any pandemic disease which are interfering with normal operations and typical resources availability.

Record Keeping

Reference: 192.807

The operator will ensure maintenance of qualification-related records through one or more of the following methods:

- Paper
- Electronic
- Any other appropriate formats

Qualification records will include, but are not limited to:

- Identification of qualified individuals (individual's name)
- Identification of the covered tasks the individual is qualified to perform
- Date(s) of current qualification, and
- Qualification method(s)

Records supporting an individual's current qualifications will be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks will be retained for a period of five years after subsequent evaluation or the individual is no longer required to be qualified in task.

The official OQ-related records for Florida City Gas employees and contractors will be maintained by the Operator Qualification Administrator in Veriforce. Company Field Operations and Contractors will maintain a copy of the evaluations they have conducted in accordance with the OQ written plan. The Operator Qualification Administrator will provide required documentation to internal, external and regulatory bodies as required.

Contractors

The Company will verify that all individuals performing covered tasks, including contractor or subcontractor employees, are qualified according to the provisions set forth in this plan. The operator may, at its discretion, accept the provisions of a contractor's plan. Contractors shall make available, upon request, written records of their employees' qualifications. At a minimum, these records shall include:

- Identification of qualified individual(s)
- Identification of covered task(s) each individual(s) is qualified to perform
- Date of qualification for specified tasks
- Method of evaluation used to qualify the individual
- Name of individual and organization who evaluated each individual
- Contractors qualifying under the Florida City Gas OQ plan may perform work on all Florida City Gas facilities regardless of the region in which the evaluation was conducted

Florida City Gas requires that contractor/sub-contractor employees be qualified regardless of whether performing a new construction or maintenance task identified as a covered task under Florida City Gas' OQ plan.

The contractor or subcontractor shall provide any additional information requested by the operator pertaining to the qualification of individuals performing covered tasks on the operator's pipeline facility. The operator identifies the covered tasks.

A Contractor employee shall wait a minimum of 24 hours before attempting to retake a failed evaluation.

Span of Control

One covered task at a time shall be directed and observed by a qualified individual of a non-qualified individual(s) performing the covered task.

Individuals shall refer to the span of control document to define the number of individuals a qualified individual may direct and observe on a specific task.

Qualified individuals must also give due consideration to elements such as the weather when determining the number of individuals that can be directed and observed at a given time.

Span of control is only allowed for the following:

- New company or contractor employees not yet qualified
- Individuals moving into a new position which would require other covered task qualifications not yet obtained at the time of position change
- Individuals who have become disqualified due to Special Cause

Span of Control guidelines are identified and included in [Appendix A](#).

Appendix A Covered Task List

Covered Task List	Qualification Intervals/Yr	Span of Control Maximum Number
001A Abandonment and deactivation of facilities	5 NTE 63 months	3
001B Abandonment and deactivation of facilities (service lines not in use)	5 NTE 63 months	3
001C Abandonment and deactivation of facilities (service lines not in use) X-Pander Pipeline Plug	5 NTE 63 months	3
001SUBA Pipeline Shutdown, Plastic and Steel Pipe by Use of Squeezers	5 NTE 63 months	3
001SUBB Pipeline Shutdown by Use of Stopping Equipment	5 NTE 63 months	3
001SUBC Pipeline Shutdown, Cast Iron	5 NTE 63 months	3
003A Cathodic Protection Testing (Pipe-To-Soil)	3 NTE 39 months	2
003B Cathodic Protection Testing (Pipe-To-Soil)-Survey Contractors	3 NTE 39 months	2
004A Damage Prevention Inspection	1 NTE 15 months	3
004B Damage Prevention Inspection (Excavation)	1 NTE 15 months	3
005A ECC: Corrosion control – atmospheric	5 NTE 63 months	3
005B ECC: Corrosion control – atmospheric meter sets	5 NTE 63 months	3
005C ECC: Corrosion control – atmospheric	5 NTE 63 months	3
006A ECC: Corrosion control - evaluation of exposed pipe	3 NTE 39 months	3
007A ECC: Operation of Short Locator, Tinker and Razor Pipe Detector (PD)	5 NTE 63 months	2
007B ECC: Operation of Short Locator, Radiodetection Pipeline Current Mapper (PCM)	5 NTE 63 months	2
007C Operation of Current Interrupter	3 NTE 39 months	2
007D Conducting Interference Testing	3 NTE 39 months	2
007E Rectifier Inspection and Operation	3 NTE 39 months	2
007F Electrical Isolation Testing	3 NTE 39 months	2
007G Inspecting for a Shorted Casing	3 NTE 39 months	2
008A ECC: Corrosion control - inspection and application of coating	3 NTE 39 months	4
008B inspection and application of coating Epoxy Coating	3 NTE 39 months	4
008C inspection and application of coating Composite Wrap (Res-Q Composite Wrap)	3 NTE 39 months	4
008D Inspection of Coating by Jeeping	3 NTE 39 months	2
008E Inspection and Application of Composite Wrap (Clock Spring Composite Wrap)	1 NTE 15 months	0*

008F Inspection and Application of Composite Wrap (Clock Spring Contour Composite Wrap)	1 NTE 15 months	0*
008G Inspection and Application of Composite Wrap (Black Diamond Composite Wrap)	1 NTE 15 months	0*
009A ECC: Corrosion control – installing test leads	5 NTE 63 months	3
009B Installation of Zinc Ribbon for AC Mitigation	5 NTE 63 months	3
018A EFV installation	5 NTE 63 months	0*
019A Hazard control	5 NTE 63 months	3
020A Increase system pressure (uprating)	3 NTE 39 months	3
021A Inspection of plastic pipe	5 NTE 63 months	3
022A Inspection of steel pipe	5 NTE 63 months	3
023A Installation and maintenance of line markers	5 NTE 63 months	3
024A Installation of customers’ meters and regulators	3 NTE 39 months	2
024B Installation of customers’ meters and regulators – meter express (prefabricated)	3 NTE 39 months	2
025A Installation of plastic pipe	3 NTE 39 months	4
025B Installation of plastic pipe (Boring Process)	3 NTE 39 months	4
026A Installation of steel pipe	3 NTE 39 months	4
027A Installation of support and anchors	3 NTE 39 months	4
028A Installing, operating, inspecting and testing pressure limiting devices Regulator Stations	3 NTE 39 months	3
028B Installing, operating, inspecting and testing pressure limiting devices Residential and Commercial	3 NTE 39 months	3
028C Residential Regulators and Building Wall Regulator Stations	3 NTE 39 months	3
028D SCADA Pressure Control	3 NTE 39 months	3
029A Internal corrosion control	5 NTE 63 months	3
030A Joining plastic and Steel Pipe by Mechanical Means	1 NTE 15 months	0**
032A Leak investigation	1 NTE 15 months	2
032B Leak investigation Propane	1 NTE 15 months	2
032C Leak investigation (Survey contractors)	1 NTE 15 months	2
032D Inside Leak Investigation	1 NTE 15 months	2
032E Above Ground Leak Investigation and Repair	1 NTE 15 months	2
032F Leak Investigation Medium BTU Landfill Gas Pipelines	1 NTE 15 months	2
032G Leak Investigation Including GPS Tracking	1 NTE 15 months	2
033A Leak repairs: Includes Use of Pit Depth Gauge	1 NTE 15 months	3
033B Leak repairs: Above Ground Leak Repair Including Replacement of Service Valve	1 NTE 15 months	3
033C Leak repairs: Above Ground Leak Repair Excluding Replacement of Service Valve	1 NTE 15 months	3
033D Leak Repairs: Medium BTU Landfill Gas Pipelines	1 NTE 15 months	3

033E Leak Repairs: Above Ground Leak Repair by Tightening (Survey Contractor)	1 NTE 15 months	3
034A Leak survey	3 NTE 39 months	2
034B Leak survey Propane	3 NTE 39 months	2
034C Leak survey (Survey Contractors)	3 NTE 39 months	2
034D Leak Survey Medium BTU Landfill Gas Pipelines	3 NTE 39 months	2
037A Nondestructive testing of welds	1 NTE 15 months	0*
038A O&M of cast iron pipe	5 NTE 63 months	3
039A O&M of copper pipe	3 NTE 39 months	3
040A O&M of propane air peak shaving facilities	3 NTE 39 months	3
041A Odorant Sampling Odorator	3 NTE 39 months	2
041B Odorant Sampling Odorometer	3 NTE 39 months	2
041C Odorant Sampling DETEX DX 1000GL	3 NTE 39 months	2
041D Odorant Sampling Medium BTU Landfill Gas Pipeline	3 NTE 39 months	2
042A Operation of pipeline components by system control	3 NTE 39 months	1
042B Operation of pipeline components by system control (Compressor Station)	3 NTE 39 months	1
043A Patrolling pipelines	5 NTE 63 months	3
043B Patrolling pipelines Aerial	5 NTE 63 months	3
043C Patrolling pipelines (Under Water)	5 NTE 63 month	3
044AA Pipe locating and marking All Conventional Equipment	1 NTE 15 months	3
044L Pipe locating and marking (Generic GPR)	1 NTE 15 months	3
044M Pipe locating and marking (Gas Tracker)	1 NTE 15 months	3
045A Pressure testing lines	3 NTE 39 months	3
046A Purging of pipelines	3 NTE 39 months	3
046B Purging of pipelines Propane	3 NTE 39 months	3
046C Purging of pipelines Service Riser	3 NTE 39 months	3
046D Purging of Pipelines Medium BTU Landfill Gas Pipeline	3 NTE 39 months	3
051A Tapping Steel Pipe ½” to 2½”	3 NTE 39 months	0*
051B Tapping Plastic Pipe	3 NTE 39 months	0*
051C Tapping Steel Pipe 3” and above	3 NTE 39 months	0*
051D Tapping Self-Tapping	3 NTE 39 months	0*
051E Tapping Cast Iron Pipe	3 NTE 39 months	0*
052A Valve Inspection	5 NTE 63 months	3
053A Vault inspection and maintenance	1 NTE 15 months	3
055A Visual inspection of joining materials others than welding Heat Fusion	1 NTE 15 months	0**
055B Visual inspection of joining materials others than welding Electrofusion	1 NTE 15 months	0**

056A Welding	1 NTE 15 months	0**
057A Odorization	3 NTE 39 months	3
058A Inspection of Copper Pipe	5 NTE 63 months	3
059A Generic Abnormal Operating Conditions	3 NTE 39 months	3
060A Start Up and Shutdown of Compressor Station	3 NTE 39 months	2
061A Drilling and Tapping of Meter Casing	5 NTE 63 months	2
062A SCADA RTU Maintenance and Installation	3 NTE 39 months	2

NTE = not to exceed

The evaluation intervals will be administered as follows:

- Annual evaluation intervals: Evaluation will occur once every calendar year not to exceed 15 months or the calendar year.
- 3-year evaluation intervals: Evaluations will occur once every third calendar year not to exceed 39 months or the calendar year.
- 5-year evaluation intervals: Evaluation will occur once every fifth calendar year not to exceed 63 months or the calendar year.

Span of Control

Span of control is defined as the maximum number of non-qualified individuals performing an identified covered task that a qualified individual may directly observe.

*Cannot be performed under direct observation; all individuals performing this task must be OQ qualified

**All individuals performing this task must be OQ qualified and must also possess a joining qualification (49 CFR Part 192 regulatory requirements).

Veriforce Operator Qualification Common Covered Tasks have been reviewed and found to be acceptable equivalents for FCG Covered tasks. Refer to Operator Qualifications Administrator for equivalency matrix and applicability.

Appendix B Generic Abnormal Operating Conditions

Abnormal Operating Conditions have been identified by the operator as conditions that an individual performing a covered task may encounter.

1. Escaping Gas – Any unplanned, uncontrolled escape of gas during the performance of a covered task.
2. Fire or Explosion – The uncontrolled ignition of gas while performing a covered task.
3. No Gas – Unplanned absence of gas caused by numerous factors including, but not limited to, inadvertent shut down (water, severed line, etc.) while performing a covered task.
4. Excessive Pressure – Pressure that exceeds the operating limits of the gas system while performing a covered task.
5. Inadequate Pressure – Pressure that falls below the normal operating requirements of the gas system during the performance of a covered task.
6. Improper Odorization – Excessive or inadequate odorization of a gas system while performing a covered task.
7. Environmental Incident – Uncontrolled spill or release of environmentally hazardous materials during the performance of a covered task.
8. Atmospheric Changes – Loss of a safe atmosphere while performing a covered task.
9. Damage to Facilities – Any damage to a pipeline component that occurs during the performance of a covered task.
10. Component Failure – Failure of a component of the pipeline to perform in the manner for which it was designed.
11. Exposed Facility – The unplanned exposure of facilities due to construction activity, washout, or any other circumstance.
12. Unmarked Facilities – Recognition of the presence of unmarked gas facilities in a construction area.
13. Stray Current – The presence of unintended electrical current on a pipeline facility
14. Improper Venting – Venting terminates inside or in a place where gas could accumulate, vent piping too small or clogged.