

SUMMARY

This utility procedure establishes methods and processes for implementing <u>Utility Standard</u> <u>SAFE-3001S</u>, <u>"Contractor Safety Standard,"</u> and the other standards and procedures referenced in this document.

Level of Use: Informational Use

TARGET AUDIENCE

This procedure applies to the following personnel:

- PG&E employees overseeing electric transmission line (T-Line) and substation contracted work.
- Contractors performing T-Line or substation work on behalf of the following lines of business (LOBs):
 - Vegetation management
 - Corporate security
 - Corporate real estate strategy and services (CRESS)
 - Facilities maintenance operations (FMO)
 - Information technology (IT)

Contractors can follow the LOB's procedure, if it meets the minimum requirements set forth in this document.

SAFETY

This procedure supports <u>Utility Standard SAFE-3001S</u>. Adherence to <u>SAFE-3001S</u> promotes safety by ensuring that:

- All contractors and subcontractors performing high- and medium-risk work are prequalified before performing work.
- An executed contract is in place before starting work.
- Contractor safety requirements are included in the contract.
- Safety hazards have been identified, planned for, and mitigated.
- PG&E and the contractor have provided adequate oversight for the scheduled work.



BEFORE YOU START

COMPARE the publication date AND version number of this procedure with the most recently published electronic version to verify that it is current.

READ AND UNDERSTAND <u>Utility Standard SAFE-3001S</u> AND the <u>Reference Documents</u> cited in this procedure.

NOTE

The roles and responsibilities described in this procedure should **not** be considered all inclusive.

SEE <u>Appendix A, "Contractor Safety – Roles and Responsibilities Matrix,"</u> on Page 15 of this procedure, for a quick reference of the tasks performed during all phases of construction.

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PROCEDURE STEPS

1 Preconstruction

The following are the PG&E and contractor roles and responsibilities during the preconstruction phase of a project for high- and medium-risk work:

- 1.1 Supply chain or authorized procurement representatives (<u>SAFE-3001S</u>, Section 2.4) have the following responsibilities:
 - 1. ENSURE a well-defined scope of work is included in the contract.
 - EVALUATE AND SELECT contractors, based on the prequalification requirements in <u>SAFE-3001S</u>, by ensuring that contractors and subcontractors identified on Exhibit 1 in the contract who are performing medium- or high-risk work are prequalified in ISNetworld (ISN) with an A or B grade.
 - VERIFY that contractors have completed PG&E's Safety Prequalification Contracted Administrator-ISN process before starting work. In emergency/emergent work situations, REFER to <u>SAFE-3001S</u>.



- 1.1 (continued)
 - 4. VERIFY that contractors have established criteria to meet or exceed PG&E's minimum field oversight requirements described in <u>SAFE-3001S</u>.
 - 5. SUBMIT variance requests for contractors that do not meet PG&E's prequalification criteria, per <u>SAFE-3001S</u>, Section 3.
- 1.2 Work Supervisor
 - 1. A work supervisor is a designated individual, typically a supervisor, authorized to make decisions impacting safety, scheduling, production, and project costs.
 - a. Directors and managers may authorize others, such as project managers or engineers, to fill the role of a work supervisor.
 - 2. Work supervisors have the following responsibilities:
 - a. DETERMINE appropriate contractor oversight for the project, considering (at a minimum) the following items:
 - The scope of the work and associated risk.
 - PG&E policies, standards, and procedures.
 - The potential for hazard exposure to PG&E employees, contractors, and the public.
 - The frequency of documented field safety observations in accordance with the guidelines in <u>Table 3</u> on Page 10 in this procedure.
 - Conditions required by <u>Utility Procedure SAFE-3001P-11, "Contractor</u> <u>Safety Pre-Qualification Variance Request Procedure."</u>
 - Remoteness of the worksite.
 - Site access.
 - The available local knowledge regarding operational issues.
 - Other site-specific information.
 - b. PERFORM contractor observations.
 - (1) The level of contractor oversight required is set forth in <u>Table 1, "Site</u> <u>Representatives,"</u> on Page 4.



1.2 (continued)

Table 1.	Site Re	epresentatives
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Site Representative Assignment Guidelines*			
Project Type	Site Representative Type**	Required Approvals	
Medium-risk activities	Competent site representative.		
Single high-risk activity	Competent site representative trained in the specific high-risk activity.		
Multiple high-risk activities	Multiple competent site representatives can be used. If the task is specialized, a qualified site representative trained in that specific task or work method must be used.	Work Supervisor	

The work supervisor must approve any deviation from the guidelines in this <u>Table 1</u>.

- ** If the qualified site representative is not trained in all high-risk activities at the project, the work supervisor and safety representative must collaborate and assign additional site representatives to address any remaining high-risk activities.
- c. Safety plans are required for high-risk work activities.
 - (1) The T-Line and substation contractor safety teams REVIEW AND APPROVE Programmatic Safety Plans (PSPs) in ISN annually.
 - (2) The T-Line and substation contractor safety teams REVIEW AND APPROVE all Project Specific Safety Plans (PSSPs). The safety teams may ENGAGE work supervisors, construction managers and other subject matter experts (SMEs) to ensure all identified hazards are properly mitigated in the PSSP.
 - (3) The T-Line and substation work supervisors VERIFY the contractor's safety plan has been approved before the contractor begins any high-risk work activities.
 - (4) All personnel approving safety plans must MEET the minimum requirements specified in <u>SAFE-3001S</u>, "Contractor Safety Standard."
- d. VERIFY that contracted work is monitored by PG&E representatives or third-party experts qualified to perform such work.
 - (1) IF the complexities of the work dictates,

THEN supervisors may ASSIGN safety personnel to provide additional oversight in addition to the PG&E site representative.



1.2 (continued)

- e. PROMOTE a safe work environment by ensuring that the contractor and project team clearly understand the roles and responsibilities related to their scope of work:
 - (1) VERIFY that contractors have access to the appropriate policies, standards, and procedures applicable to the work to which they are assigned.
- f. ENSURE that the contractor conducts a thorough initial tailboard (project kick-off meeting) before starting physical high-risk work activities.
- 1.3 Site Representative/Inspector
 - 1. The site representative/inspector is a designated PG&E or contract employee assigned by the work supervisor (or designee) and has the following responsibilities:
 - a. OVERSEE the safety of contractors performing work on PG&E facilities.
 - b. READ AND UNDERSTAND any conditions placed on the work by the contractor's PSSP for high-risk work.
 - c. HAVE proper training, knowledge, and experience to perform their duties.
 - 2. Site representatives/inspectors are classified in <u>Table 2</u> on Page 6.



1.3 (continued)

Table 2. Site Representative Classifications

Competent Site Representative		
Description	 Can identify existing and predictable hazards in surroundings or work conditions that are unsanitary or dangerous. 	
	 Has training, knowledge, or experience related to the scheduled work and knowledge of appropriate mitigation measures for the associated hazards. 	
	 May have formal training to identify and mitigate hazards associated with specific high-risk activities. 	
	Has familiarity with <u>SAFE-3001S</u> .	
	Has familiarity with appropriate personal protective equipment (PPE).	
	Has training on specific high-risk activities under observation.	
	Has training or experience providing oversight to contractors.	
Typical Job Titles	Contractor or PG&E inspector.	
	Safety representative.	
	Qualified electrical worker (QEW).	
Qualified Site Represe	Qualified Site Representative	
Description	Has all required items available for competent site representative.	
	 Has formal training to identify and mitigate hazards associated with specific high-risk activities. 	
	Has formal training in the work being performed.	
Typical Job Titles	 Demolition/explosive expert, commercial diver, helicopter expert (for substation only). 	

- 1.4 Site representatives/inspectors have the following responsibilities:
 - 1. VERIFY that construction work conforms with contract conditions and safety standards.
 - 2. ATTEND the contractor's project kick-off meeting for high-risk work.
 - 3. VERIFY at the project kick-off that contract employees have valid ISN badges.
 - 4. ENSURE that contractors hold daily safety tailboards.
 - 5. ENSURE that contractor tailboards include, at a minimum, the following information and documentation:
 - Local knowledge and information regarding site-specific safety considerations.
 - Scope of the work.
 - Drawings, specifications, standards, policies, and/or procedures applicable to the work.



1.4 (continued)

- Proper electrical clearances required to safely de-energize and isolate electrical equipment.
- Hazards identified and mitigated by PG&E.
- Hazards identified and mitigated by the contractor.
- Work stoppage criteria.
- Emergency Action Plan.
- 6. PROVIDE contractor access to PG&E-restricted areas.
- 7. WALKDOWN clearance points, when applicable.
- 8. ENSURE that PG&E safety requirements are communicated to and acknowledged by contractors before starting work.
- 9. ENSURE that the contractor's approved PSSP for high-risk work is onsite.
- 10. VERIFY that subcontractors are identified on the PSSP and, if performing medium or high-risk work, that they are prequalified in ISN with an A or B grade.
- 1.5 Contractor

Before contractors or subcontractors start work on PG&E facilities, the contractor must CONFIRM that all field contractors and subcontractors have met the following prerequisites:

- 1. SATISFIED the requirements of <u>SAFE-3001S</u>.
- 2. PROVIDED appropriate documentation that a field orientation has been completed by site personnel.
- 3. ENSURED that field contract employees and subcontract employees have ISN badges and that they have completed all required training.
- 4. SUBMITTED a contractor PSSP to PG&E for all high-risk work (and PG&E personnel familiar with the work have approved the plan).
 - a. The contractor's PSSP must include, at a minimum, the following information:
 - An Emergency Action Plan.
 - Identification of hazards and mitigations applicable to the work scope.
 - Specific licenses/certifications required to perform work tasks.



1.5 (continued)

- Identification of all subcontractors.
- Documentation of review of PSSP by all site personnel.
- Documentation of changes identified in the field and approved by PG&E.
- Method for promptly notifying the PG&E site representative/inspector of all safety incidents that occur while working on PG&E assets, including any injury or medical emergency.
- 5. ENSURED a project kick-off meeting was held to review the PSSP.
- 6. PERFORMED a hazard analysis before starting work.
- 7. COMMUNICATED known or potential hazards to their field employees before starting work.
- 8. PERFORMED site safety observations.

2 Construction

The following are the roles and responsibilities during the construction phase of the project for high- and medium-risk work:

- 2.1 The supply chain or authorized procurement representative (<u>SAFE-3001S</u>, Section 2.4) PARTNERS with the LOB representative, safety personnel, or other SME before issuing significant changes to the work.
- 2.2 Work Supervisor
 - 1. ENSURE that competent personnel familiar with job hazards and safety requirements are assigned to monitor contractor and subcontractor safety for medium-risk work.
 - 2. ENSURE that qualified personnel are assigned to monitor high-risk activities where the competent person is trained in that specific activity (except for work involving a single high-risk activity where the competent person is trained in that activity).
 - 3. ENSURE that appropriate PG&E and contractor personnel are present during tailboards.
 - 4. PROVIDE timely notifications regarding any safety issues.
 - 5. ENSURE all serious injury and fatality (SIF) incidents are investigated using causal analysis methodologies, per <u>Utility Standard GOV-6102S</u>, "Enterprise Cause Evaluation Standard."



2.2 (continued)

- a. REFERENCE <u>Utility Procedure GOV-6102P-06</u>, "Enterprise Cause Evaluation <u>Process Procedure</u>," for additional details.
- ENSURE corrective actions are developed and implemented for all SIF incidents, per GOV-6102S.
 - a. REFERENCE <u>GOV-6102P-06</u> for additional details.
- 7. ENSURE that the site representative/inspector performs safety observations in accordance with <u>Table 3</u> on Page 10.
- 2.3 Site Representative/Inspector
 - 1. CONDUCT AND DOCUMENT field safety observations to verify compliance with applicable safety requirements.

NOTE

<u>Table 3</u> defines field safety risk categories and observation requirements for medium- and high-risk jobs.

- 2. STOP activities that are unsafe, could adversely affect the environment, or are not in compliance with design drawings, specifications, or permit conditions.
- 3. ENSURE any deviation from the approved safety plan or Job Site Safety Analysis (JSSA)/Job Hazard Analysis (JHA) is authorized by PG&E and documented on the PSSP change log.
- 4. ENSURE all contractor and subcontractor work at the jobsite is documented in the PSSP (for high-risk work) and that they have met the PG&E prequalification requirements.
- 5. ENSURE on-site contractors have active ISN badges by performing periodic field verifications.
- 6. ACT as the responsible liaison for documenting and confirming resolution of safety infractions or issues and communicating them to PG&E leadership.
- 7. COMMUNICATE safety issues to the work supervisor, in accordance with PG&E's safety reporting requirements.
- 8. COLLECT project-related documentation.



2.3 (continued)

- 9. Actively PARTICIPATE in daily tailboard meetings (led by the contractor) to ensure that the following actions are performed, and safety is planned for the day, as appropriate:
 - The contractor's JSSA/JHA addresses all foreseeable hazards associated with the activities planned for the day.
 - Changed conditions are identified and documented in the contractor's PSSP for high-risk work.
 - Changes to the contractor's proposed methods are identified and addressed in the contractor's PSSP for high-risk work.
 - The contractor's PSSP is followed throughout the project for high-risk work.
 - Best practices are discussed.

Table 3. Field Safety Observations

Field Safety Observations – Frequency Requirements		
Risk	Work Description	How Often?
High	Tasks that meet the criteria for high risk for substation, per <u>Attachment 1, "Substation Contractor Safety Risk Assessment –</u> <u>Decision Tree,"</u> and for T-Line, per <u>Attachment 2, "T-Line Contractor</u> <u>Safety Risk Assessment – Decision Tree."</u>	1 per week per job
Medium	Tasks that meet the criteria for medium risk for substation, per <u>Attachment 1</u> , and for T-Line, per <u>Attachment 2</u> .	1 per month per job

2.4 Contractor Safety Specialist

- 1. ENSURE the site representative/inspector has a clear understanding of their role in safety compliance and support the site representative, as needed.
- 2. ENSURE that contractors that actively perform work for the LOB remain in good standing with ISN by initiating an "Owner Client Dashboard Grade Change Notification" in ISN.
- 3. PROVIDE work plan schedules to the Corporate Contractor Safety Team on a monthly basis for medium- or high-risk projects.
- 2.5 Contractor Requirements

Contractors have the following responsibilities during the construction phase of the project (includes <u>SAFE-3001S</u>, Section 2.1):



2.5 (continued)

- 1. ENSURE that all worksite visitors, contractors, sub-contractors, PG&E employees, and members of the public are informed of hazards and controls required for the work location before starting work, when applicable.
- 2. ENSURE the approved PSSP is on the jobsite for high-risk work.
 - a. IF the approved PSSP is not on the jobsite,

THEN work cannot be performed until the PSSP is at the jobsite.

- 3. USE JSSA/JHA methods to identify and communicate known or potential hazards to their employees, other potentially impacted workforces, and the public before starting work.
 - a. The responsible PG&E employee or designee must REVIEW AND APPROVE any deviation from the contractor's work plan or hazard control methods.
 - b. DOCUMENT any changes to the PSSP for high-risk work, using the PSSP Change Log.
- 4. Continuously OVERSEE their employees and other workers under their direct control to ensure those workers comply with PG&E and regulatory safety requirements.
- 5. REPORT any safety incidents to the PG&E site representative as soon as practical.
- 6. DISCUSS best practices.

3 **Post-Construction**

The following are the roles and responsibilities during the post-construction phase of the project for high- and medium-risk work:

- 3.1 Work Supervisor
 - 1. APPRAISE the contractor's job performance by completing a post-job performance appraisal in ISN after completing the work.
 - 2. For multi-year contracts, SUBMIT post-job performance appraisals at least annually.
 - 3. ENSURE that appropriate project-related documentation is properly maintained/filed.
 - a. Final project-related documentation includes, but is not limited to, the following:
 - Contractor PSSP for high-risk work



3.1 (continued)

- Safety incident analyses/root cause analyses, including corrective actions
- Field safety observation documentation
- Contractor's Post-Job Performance Appraisal in ISN
- 3.2 Contractor Safety Specialist
 - 1. ENSURE that the appropriate LOBs host an annual Contractor Safety Forum with primary contractors to discuss events, lessons learned, and performance feedback.

END of Instructions

DEFINITIONS

Contractor: A company directly hired by PG&E to complete a specific scope of work or service. References to "contractor" in this document include all subcontracted resources.

Contractor safety variance process: Supplemental internal safety performance review process defined in <u>SAFE-3001S</u> for contractors or subcontractors that **do not** meet established PG&E safety criteria.

Medium and high risk: Risk categories defined in <u>Attachment 2, "T-Line Contractor Safety</u> <u>Risk Assessment – Decision Tree."</u>

Project Specific Safety Plan (PSSP): Detailed safety plan created by the contractor to eliminate or mitigate specific jobsite environmental, health, and safety hazards associated with the work.

Serious safety incident: An incident resulting in a life-threatening or life-altering injury or fatality to the public, employees, or contractors from work or caused by a failure or malfunction of PG&E facilities.

Stop work: The deliberate act of halting work to eliminate or effectively control an unsafe work condition, practice, or behavior.



IMPLEMENTATION RESPONSIBILITIES

Electric transmission directors and managers are responsible for communicating and implementing this procedure.

Electric transmission directors, managers, and supervisors are responsible for the following:

- Endorsing and supporting the implementation of this procedure, as well as <u>SAFE-3001S</u>.
- Participating in preconstruction safety meetings, as appropriate.
- Providing an avenue for escalating safety issues.

GOVERNING DOCUMENT

Utility Standard SAFE-3001S, "Contractor Safety Standard"

COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

Cal/OSHA Title 8 Regulations

CPUC Decision 15-07-014, dated July 23, 2015

REFERENCE DOCUMENTS

Developmental References:

Utility Procedure GOV-6102P-06, "Enterprise Cause Evaluation Process Procedure"

<u>Utility Procedure SAFE-3001P-11, "Contractor Safety Pre-Qualification Variance Request</u> <u>Procedure"</u>

Utility Standard GOV-6102S, "Enterprise Cause Evaluation Standard"

Supplemental References:

NA

APPENDICES

Appendix A, "Contractor Safety – Roles and Responsibilities Matrix"

ATTACHMENTS

Attachment 1, "Substation Contractor Safety Risk Assessment – Decision Tree"

Attachment 2, "T-Line Contractor Safety Risk Assessment – Decision Tree"



DOCUMENT RECISION

This utility procedure cancels and supersedes Utility Procedure TD-1952P-01, "Electric Transmission Contractor Safety Procedure," Rev. 1, dated 06/29/2019.

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REVISION NOTES

Where?	What Changed?
Throughout Document	Updated references and hyperlinks.
Section 1.2.2.c	Added bullet item (4), as follows: "All personnel approving safety plans must MEET the minimum requirements specified in <u>SAFE-3001S</u> , <u>'Contractor Safety Standard.'"</u>



Appendix A, Contractor Safety – Roles and Responsibilities Matrix

(Page 1 of 3)

Preconstruction (Phase I)		
Role	RESPONSIBILITIES	
Supply chain or authorized procurement representative	 ENSURE a well-defined scope of work is included in the contract. EVALUATE AND SELECT contractors, based on the prequalification requirements in <u>SAFE-3001S</u>. VERIFY that contractors have completed PG&E's prequalification process before starting work. In emergency/emergent work situations, REFER to <u>SAFE-3001S</u>, Section 4. VERIFY that contractors have established criteria to meet or exceed PG&E's minimum field oversight expectations (described in <u>SAFE-3001S</u>, Appendix A, "Risk Matrix – Definition and Examples"). 	
	 SUBMIT variance requests for contractors that do not meet PG&E's pre-qualification criteria, per <u>SAFE-3001S</u>, Section 3. 	
Work supervisor	DETERMINE the appropriate level AND frequency of contractor oversight required.	
	 ENSURE the contractor's PSSP has been reviewed and approved before commencing high-risk activities. 	
	• VERIFY that contracted work is monitored by PG&E employees (or third-party experts) qualified to perform such work.	
	PROMOTE a safe work environment.	
	ENSURE that the contractor conducts an initial tailboard (project kick-off meeting).	
Site representative/ inspector	• VERIFY that construction work conforms to contract conditions and safety standards.	
	ATTEND the contractor's project kick-off meeting.	
	 VERIFY at project kick-off that contract employees working onsite have valid ISN badges. 	
	• ENSURE that contractors hold daily safety tailboards. PROVIDE contractors access to PG&E-restricted areas.	
	WALKDOWN clearance points, when applicable.	
	ENSURE contractor's approved PSSP is onsite.	
	• VERIFY that subcontractors are identified on the PSSP and if performing medium or high-risk work, that they are prequalified in ISN with an A or B grade.	



Appendix A, Contractor Safety – Roles and Responsibilities Matrix

(Page 2 of 3)

Preconstruction (Phase I) continued	
Role	RESPONSIBILITIES
Contractors	• SATISFY <u>SAFE-3001S</u> requirements.
	 PROVIDE appropriate documentation that the field orientation was completed by site personnel.
	• SUBMIT a contractor PSSP for all high-risk work.
	 PERFORM a hazard analysis AND COMMUNICATE known or potential hazards to their employees before starting work.
	 ENSURE field contract employees and sub-contract employees have ISN badges and have completed all required training.
	PERFORM site safety observations

Construction (Phase II)	
Role	RESPONSIBILITIES
Supply chain or authorized procurement representative	 PARTNER with LOB representative, safety personnel, OR SME before issuing significant changes to the work.
Work supervisor	• ENSURE competent personnel familiar with job hazards and safety requirements are assigned to monitor contractor and subcontractor safety for medium-risk work activities, and qualified personnel are assigned to monitor high-risk work activities (except for work involving a single high-risk activity where the competent person is trained in that activity).
	• ENSURE PG&E personnel and contractors are present during tailboards.
	APPROVE contractor's PSSP before starting high-risk work.
	PROVIDE timely notifications regarding any safety issues.
	ENSURE all serious safety issues are investigated.
	• ENSURE corrective actions are implemented for all serious safety incidents.
	ENSURE site representatives/inspectors perform safety observations.



Appendix A, Contractor Safety – Roles and Responsibilities Matrix

(Page 3 of 3)

Construction (Phase II) continued		
Role	RESPONSIBILITIES	
Site representative/ inspector	 CONDUCT AND DOCUMENT field safety observations. HALT unsafe activities. ENSURE any deviations from the approved safety plan are documented on the PSSP change log. ENSURE all contractors and subcontractors performing work at the jobsite are documented in the PSSP and that they have met the PG&E prequalification requirements. DOCUMENT safety issues AND COMMUNICATE them to PG&E leadership. 	
	 Actively PARTICIPATE in daily tailboards (led by the contractor). ENSURE contractor's PSSP is adhered to throughout the project. 	
Contractors	 ENSURE approved PSSP is on the jobsite. DOCUMENT any changes to the PSSP using the PSSP Change Log. USE JSSA/JHA methods to identify and communicate hazards to their employees, other impacted workforces, and the public. (PG&E must review and approve any deviation from the contractor's work plan/hazard control methods.) Continuously OVERSEE their employees and other workers under the contractor's direct control to ensure compliance with safety regulations. 	
	REPORT any safety incidents to the PG&E site representative.DISCUSS best practices.	

Post-Construction (Phase III)		
Role	RESPONSIBILITIES	
Work supervisor	COMPLETE AND SUBMIT contractor Post-Job Performance Appraisal in ISN upon completion of work, or annually.	
	ENSURE project-related documentation is properly maintained/filed.	