

Contractor Safety Requirements for Work Performed on Behalf of PG&E

SUMMARY

This document defines PG&E's minimum Contractor Safety Program requirements for contractors (see definition) and subcontractors (see definition) performing work (see definition) for PG&E within the scope of this document.

This document establishes the current, official contractor safety requirements aligned with SAFE-3001S, "Enterprise Contractor Safety Management Standard," for use in contracts and contractor-facing documents.

This document does not establish requirements for all work situations. Additional or different requirements may apply based on the Scope of Work (SOW), work location, asset ownership, contract terms, regulatory requirements, or PG&E Functional Area requirements.

Contractors must comply with this document when performing work within its scope. Contractors must also comply with applicable laws, regulations, contract requirements, and any additional safety requirements established by PG&E or the applicable PG&E Functional Area (FA).

Contractors are responsible for understanding and following the requirements that apply to their work before work begins and while work is performed. If requirements appear to conflict or are unclear, contractors must contact the applicable PG&E FA (see definition) before starting or continuing the affected work. Failure to meet applicable safety requirements may result in PG&E action allowed by the contract, including stopping work (see definition), removal from work, suspension, termination, or other contract remedies.

TARGET AUDIENCE

This document applies to contractors and subcontractors performing work for PG&E when this document is included in the contract, referenced by PG&E, or otherwise identified as applicable by PG&E.

Contractor Safety Requirements for Work Performed on Behalf of PG&E**TABLE OF CONTENTS**

<u>SUBSECTION</u>	<u>TITLE</u>	<u>PAGE</u>
1	Contractor Responsibilities	3
2	Contractor Safety Prequalification Requirements.....	3
3	Contractor Safety Plan Requirements	4
4	Contractor Job Hazard Analysis and Hazard Communication Requirements	5
5	Contractor Safety Observation and Oversight Requirements	5
6	Fit For Duty/ Drug & Alcohol	5
7	Personal Protective Equipment (PPE) Requirements	6
8	Contractor Incident Management and Corrective Action Requirements	6
9	Motor Vehicle Safety Requirements	6
10	Subcontractor Requirements and Performance Management	7

Contractor Safety Requirements for Work Performed on Behalf of PG&E

REQUIREMENTS

1 Contractor Responsibilities

- 1.1 Contractors are responsible for the safety of their employees, subcontractors, agents, and other personnel performing work on their behalf.
1. Contractors are responsible for directing, supervising, training, and controlling their workforce and means and methods of work.
 2. Contractors must perform work safely AND in compliance with applicable laws, regulations, contract requirements, this document, and any additional safety requirements established by PG&E or the applicable PG&E FA.
 3. Contractors must identify hazards (see definition) associated with the work and establish, maintain, and update appropriate hazard controls (see definition) before and during work.
 4. Contractors must ensure workers meet applicable training and qualification requirements before performing assigned work.
 5. Contractors must ensure subcontractors comply with applicable safety requirements.

2 Contractor Safety Prequalification Requirements

- 2.1 This section applies to contractors performing medium-risk work (see definition) or high-risk work (see definition) when PG&E prequalification is required.
- 2.2 PG&E Prequalification Requirements
1. Contractors must NOT start or continue work requiring prequalification UNLESS applicable prequalification requirements are satisfied OR another authorization has been approved by PG&E.
 2. Contractors performing medium-risk work or high-risk work must:
 - a. Complete the ISNetWorld (ISN) prequalification (see definition) process for PG&E.
 - b. Achieve and maintain an ISN grade of A or B.
 - c. Maintain accurate, complete, and current information in ISN.
 - d. Submit required safety programs, safety performance information, incident history, OSHA records, required attestations, and other documentation required to establish or maintain qualification.

Contractor Safety Requirements for Work Performed on Behalf of PG&E

2.2 (continued)

- e. Carry an ISN identification badge or have access to an electronic ID AND present it to PG&E upon request.
- f. Report contractor workforce and safety performance information in ISN in accordance with PG&E Prequalification requirements.

2.3 Scope of Prequalification

- 1. Prequalification requirements apply to contractors and subcontractors performing medium-risk work or high-risk work when required by PG&E.
- 2. The assigned risk classification is based on the highest-risk work performed under the contract, including work performed by subcontractors.

2.4 Ongoing Compliance

- 1. Contractors must maintain compliance with applicable prequalification requirements and provide supporting information to PG&E upon request.

3 Contractor Safety Plan Requirements

3.1 Safety Plan Requirement

- 1. Contractors must submit a safety plan (see definition) before work starts for high-risk work and when required by PG&E.
- 2. The safety plan must address the SOW (see definition), identify hazards, and define the hazard controls required to perform the work safely.
- 3. Contractors must receive PG&E approval of the safety plan before work begins.
- 4. Contractors must perform work in accordance with the approved safety plan and established hazard controls.

3.2 Scope Changes

- 1. Contractors must review and update the safety plan when changes occur that affect the SOW, identified hazards, or hazard controls.
- 2. Updated safety plans must be submitted to PG&E when approval is required.

Contractor Safety Requirements for Work Performed on Behalf of PG&E

4 Contractor Job Hazard Analysis and Hazard Communication Requirements

- 4.1 Contractors must identify hazards associated with the work before work begins AND when work conditions change.
1. Contractors must establish and communicate the hazard controls required to perform the work safely.
 2. Contractors must ensure workers understand the work being performed, associated hazards, required hazard controls, and applicable safety requirements before performing affected work.
 3. Contractors must update hazard identification and communication activities when the SOW, work conditions, hazards, or hazard controls change.
 4. Contractors must stop affected work when hazards are not identified, hazard controls are not in place or required hazard controls are not being followed.

5 Contractor Safety Observation and Oversight Requirements

- 5.1 Contractors must provide safety oversight appropriate to the SOW, hazards, and risk associated with the work.
- 5.2 Contractors must provide a Designated Safety Representative when the SOW, associated hazards, or work risk indicate that dedicated safety oversight is necessary to effectively implement and maintain hazard controls.
1. Contractors must perform and document safety observations of their workforce and subcontractor workforce to verify hazard controls are implemented, AND safety requirements are being followed.
 2. Contractors must take appropriate action when unsafe conditions, unsafe behaviors, or deficiencies in hazard controls are identified.
 3. Contractors must ensure personnel performing safety oversight understand the work, associated hazards, and applicable hazard controls.
 4. Contractors must cooperate with PG&E safety oversight and safety engagement activities when requested by PG&E.

6 Fit-For-Duty / Drug and Alcohol

- 6.1 Contractors must maintain a fit-for-duty and Drug and Alcohol Program (see definition) for workers performing work within the scope of this document.
1. Contractors must make fit-for-duty and Drug and Alcohol Program records available to PG&E upon request.

Contractor Safety Requirements for Work Performed on Behalf of PG&E

6.1 (continued)

2. Contractors must comply with all applicable federal, state, and local laws and regulations, including Department of Transportation (DOT) requirements when applicable.

7 Personal Protective Equipment (PPE) Requirements

7.1 Personal Protective Equipment

1. Contractors must provide and confirm that workers use required Personal Protective Equipment (PPE) based on regulatory requirements, the safety plan, and the identified hazards.

8 Contractor Incident Management and Corrective Action Requirements

8.1 Contractors must report all safety Incidents to PG&E.

1. This includes incidents (see definition) involving workers, the public, or property damage.
2. Contractors must immediately report Incidents that resulted in or had the potential to result in a Serious Injury or Fatality (SIF) (see definition).

8.2 Contractors must investigate safety incidents appropriate to the severity and potential consequences of the incident and provide investigation results or supporting information to PG&E when requested.

8.3 Contractors must identify and implement corrective actions appropriate to the incident and associated hazards.

8.4 Contractors must stop work immediately if an incident creates unsafe conditions or hazards are not controlled.

1. Work must not resume until Hazards are addressed and Controls are in place.

8.5 Contractors must cooperate with PG&E during incident reviews AND provide information and records (see definition) as requested.

9 Motor Vehicle Safety Requirements

9.1 Driving Safety Program

1. Maintain a Driving Safety Program (see definition) for workers who operate vehicles for PG&E work.

Contractor Safety Requirements for Work Performed on Behalf of PG&E

9.1 (continued)

2. Contractors must comply with:
 - a. PG&E's Contractor Motor Vehicle Safety requirements when operating vehicles for PG&E work, which includes phone-free driving requirements.

9.2 Driver Requirements

1. Maintain a valid driver license for vehicles used for PG&E work.
2. Follow applicable traffic laws and regulatory requirements.

9.3 Incident Reporting

1. Notify PG&E when a worker receives a vehicle-related violation or citation while performing PG&E work.
2. Contractors must report motor vehicle incidents (see definition) to PG&E as soon as possible and no later than 8 hours after the occurrence.

10 Subcontractor Requirements

10.1 Prime contractors are responsible for the safety performance of subcontractors performing work on their behalf.

1. Contractors must provide subcontractors with applicable safety requirements AND ensure those requirements are communicated and followed.
2. Contractors must ensure subcontractors comply with applicable contract requirements, safety requirements, and regulatory requirements.
3. Contractors must ensure subcontractor work is performed in accordance with applicable hazard controls and safety requirements.
4. Contractors must apply the safety oversight requirements in Section 5 to subcontractor work.
5. Contractors must ensure subcontractor safety incidents are reported in accordance with applicable contract requirements and PG&E requirements.
6. Contractors must take appropriate action when subcontractor safety deficiencies are identified.

Contractor Safety Requirements for Work Performed on Behalf of PG&E

11 Records Requirements

- 11.1 Contractors must maintain records necessary to demonstrate compliance with applicable safety requirements, contract requirements, and regulatory requirements.
- 11.2 Contractors must provide records and supporting information requested by PG&E to verify compliance with applicable requirements.

12 PG&E Rights and Authority

- 12.1 PG&E may review, confirm, and audit contractor compliance with these requirements.
 - 1. PG&E has the right to stop work, require additional controls, or take corrective action (see definition) if safety requirements are NOT met.
 - 2. PG&E may suspend, terminate, or restrict work due to safety non-compliance.

END of Requirements

Contractor Safety Requirements for Work Performed on Behalf of PG&E

DEFINITIONS

Contractor: A company hired by PG&E to perform Work. This includes the Prime Contractor and Subcontractors at any tier performing Work that is subject to SAFE-3001S requirements.

Corrective Action: A measure taken to eliminate, control, or prevent the recurrence of a hazard, unsafe condition, unsafe behavior, incident, or noncompliance with safety requirements.

Driving Safety Program: A Contractor program that defines requirements, Controls, and processes to ensure safe operation of vehicles during PG&E Work.

Drug and Alcohol Program: A Contractor program used to manage drug and alcohol requirements that apply to workers performing Work within the scope of this document.

Fit for Duty: A worker's ability to safely perform assigned Work without impairment from fatigue, illness, injury, drugs, alcohol, or any other condition that could affect the worker's ability to perform the Work safely.

Functional Area (FA): The PG&E workgroup that enforces the contract terms, receives the direct benefit of the contract, and serves as the Contractor's primary PG&E organization for contract management and Work oversight.

Hazard: Anything with the potential to cause harm to people, property, or the environment.

Hazard Control: A specific action or measure used to eliminate a hazard or reduce risk.

High-Energy Hazard: A Hazard with the potential to release significant energy and cause serious injury or fatality.

High-Risk Work: Work that involves High-Energy Hazards with the potential to cause serious injury or fatality and requires a Safety Plan.

Incident: Any unplanned event that results in, or could result in, injury, illness, or damage.

ISNetworld (ISN): PG&E's third-party system used to manage Contractor Prequalification, safety data, and performance.

Job Hazard Analysis (JHA): A task-specific review of job steps, Hazards, and Controls completed before and during Work.

Low-Risk Work (Out of Scope): Work that does not involve significant Hazard exposure but still requires safe work practices.

Medium-Risk Work: Work that exposes workers to Hazards that could result in serious injury but at lower energy levels than High-Risk Work.

Contractor Safety Requirements for Work Performed on Behalf of PG&E

Motor Vehicle Incident: An event involving a vehicle used for PG&E Work that results in injury, property damage, vehicle damage, or another reportable event.

Out-of-Scope Contractor: A Contractor or Subcontractor performing Work that is not subject to the requirements of SAFE-3001S based on the assigned Risk Classification or applicability of the Work.

Prequalification: The process Contractors must complete in ISN to demonstrate they meet PG&E safety requirements before starting Work.

Prime Contractor: A company hired directly by PG&E to perform Work under a contract with PG&E. The Prime Contractor is responsible for ensuring that Subcontractors performing Work on its behalf comply with applicable safety requirements.

Records: Documents and information maintained to demonstrate compliance with applicable requirements.

Risk Classification: The assigned level of risk (Low, Medium, or High) for the Work, based on Hazards and potential for serious injury.

Safety Engagement: PG&E's approach to evaluating safety performance through field observations focused on Hazard Controls instead of behavior alone.

Safety Oversight: The process of monitoring Work to ensure Hazards are identified, controls are in place, and safety requirements are followed.

Safety Plan: A documented plan that identifies Hazards and defines Controls required to perform the Work safely.

Scope of Work (SOW): The defined Work activities, services, or project requirements that the Contractor is hired to perform.

Serious Injury and Fatality (SIF): An Incident that results in a fatality or a life-threatening or life-altering injury.

Stop-Work Authority: The requirement and right to immediately Stop Work when unsafe conditions exist or safety requirements are not met.

Subcontractor: A company hired by another Contractor to perform Work on behalf of PG&E.

Work: Activities or services performed by a Contractor or Subcontractor on behalf of PG&E.

IMPLEMENTATION RESPONSIBILITIES

Contractors are responsible for complying with these requirements, ensuring Subcontractor compliance, and maintaining records to demonstrate compliance with Work performed within the scope of this document.

Contractor Safety Requirements for Work Performed on Behalf of PG&E

GOVERNING DOCUMENT

SAFE-01, "PG&E Safety Excellence Policy"

COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

Information and Records Management:

PG&E Data, Information, and Records are company assets that must be traceable, verifiable, accurate, and complete and can be retrieved upon request. Functional Areas are responsible for complying with the Information & Records Governance Policy, Standards, and the Information and Records Retention Schedule.

Contractors must perform Work in a manner that supports PG&E's commitment to preventing serious injuries and fatalities and maintaining compliance with regulatory requirements, including CPUC Decision 15-07-014.

Contractors must comply with all applicable PG&E safety requirements, including this document, contractual obligations, and applicable laws and regulations.

Failure to comply with these requirements may result in corrective action, stop-work, or removal from the Work.

REFERENCE DOCUMENTS

None

APPENDICES

None

ATTACHMENTS

None

DOCUMENT RESCISSION

This document replaces the previously utilized contractor safety requirements document referenced in contracts as "Based on SAFE-3001S." The previous document was not published in the Guidance Document Library (GDL) and is no longer in use.

DOCUMENT APPROVER

Paul Bury, Senior Director, Operational Safety

DOCUMENT OWNER

Michael Arklind, Senior Manager, Enterprise Contractor Safety

Contractor Safety Requirements for Work Performed on Behalf of PG&E

DOCUMENT CONTACT

Michael Arklind, Senior Manager, Enterprise Contractor Safety

REVISION NOTES

Where?	What Changed?
Entire document	Initial release. Establishes contractor safety program requirements aligned with SAFE-3001S and replaces a previously utilized, non-governed document.