

SAFE-3004S

Enterprise Contractor SIF Cause Evaluation Standard

Audience: PG&E Contract Partners and External Parties



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SAFE-3004S

Enterprise Contractor SIF Cause Evaluation Standard

Presentation Overview:

- SAFE-3004S Purpose and Intent
- Overview of Cause Evaluation Process
- Contractor Expectations
- Contractor Resources
- CARB Review
- EFRs



Utility Standard: 3004S
Publication Date: 07/11/2025 Rev: 2

Enterprise Contractor SIF Cause Evaluation Standard

SUMMARY

This standard is intended to provide a high-level guide for PG&E personnel overseeing contract partners through the investigative and reporting process for Serious Injury and Fatality (SIF) -level incidents involving contract partners, as defined by the Edison Electric Institute (EEI) Safety Classification & Learning Model (SCL).

It applies to cause evaluations (CEs) which must be documented in the Enterprise Corrective Action Program (ECAP). The purpose of the CE is to identify causes of performance gaps and reduce or eliminate the likelihood for reoccurrence of serious safety events.

TARGET AUDIENCE

PG&E personnel responsible or accountable for supporting and/or overseeing contract partner(s).

Personnel responsible for supporting the related incident management PG&E processes.

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SAFE-3004S Purpose & Intent

Enterprise Contractor SIF Cause Evaluation Standard

- Prior to 2024, PG&E lead all SIF Incident Investigations, including Contractor-related incidents
- Beginning in July 2024, all Contractor SIF Investigations began following the new SAFE-3004S: Enterprise Contractor SIF Cause Evaluation Standard
- **Key Change:** Contractors became the responsible party for the investigation and reporting process with SIF incidents

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SAFE-3004S Purpose & Intent

Enterprise Contractor SIF Cause Evaluation Standard

- SAFE-3004S outlines the entire SIF Cause Evaluation Process for Contract Partners and PG&E Parties, including:
 - Roles & Responsibilities
 - Incident Reporting Requirements
 - Timeline & Flowchart for Cause Evaluation Process
 - What Cause Evaluation Type is required
 - CARB Review requirements
 - Effectiveness Review Requirements and follow up Corrective Action Items
- [SAFE-3004S](#) can be found on the external [PG&E Enterprise Contractor Safety Webpage](#).
- Additional resources are available on internal PG&E Contractor Safety SharePoint sites, and can be shared upon request:
 - SAFE-3004S Flowchart
 - RCE/ACE Template

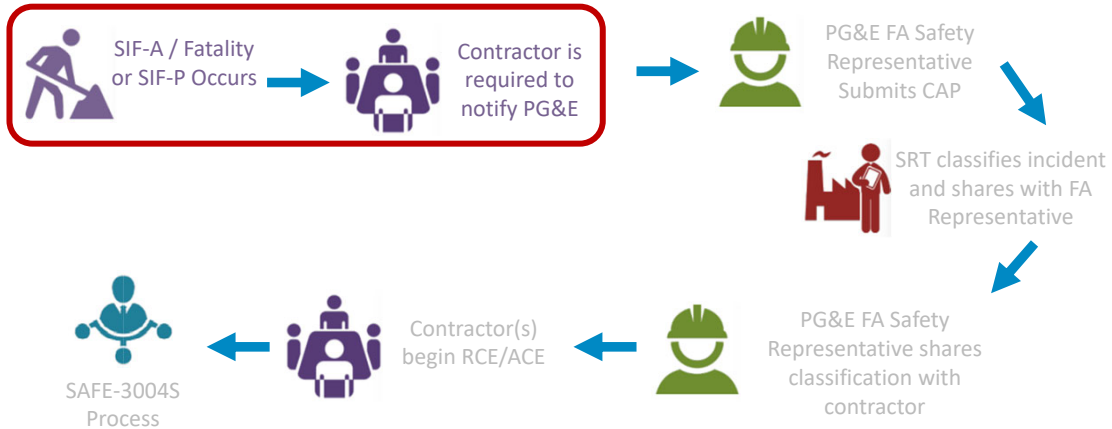
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SAFE-3004S Overview

Let's focus on when a SIF-A / Fatality or SIF-P Occurs...



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Responsibilities

Contractor is Required to Notify PG&E

- Each PG&E functional area has a different incident notification process – which shall remain in place
- Contractors are typically required to:
 - Provide informal PG&E notification within 1hr
 - Provide formal notification of incident within 8hr (with confirmed information)

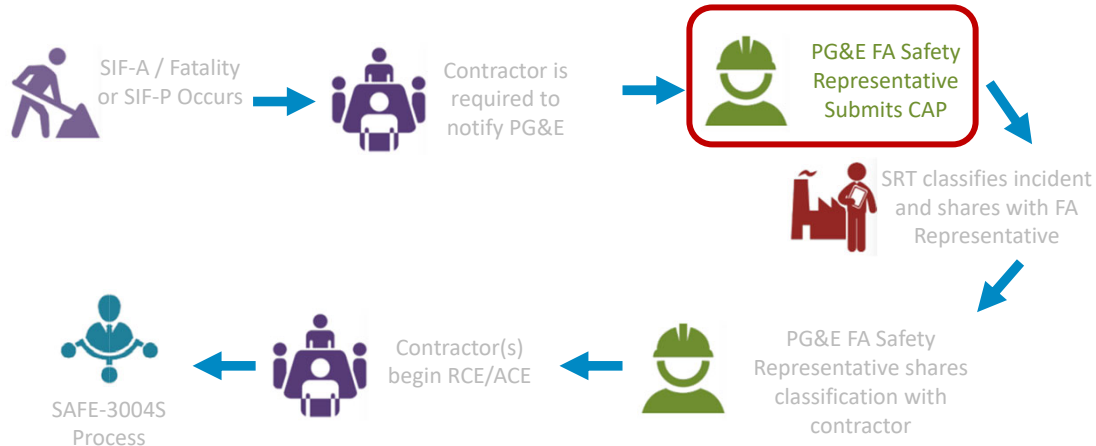
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Let's focus on when a SIF-A / Fatality or SIF-P Occurs...



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Responsibilities

PG&E FA Safety Champion Submits CAP

- The FA Safety Representative (usually the FA Safety Champions) is accountable for ensuring appropriate contractor incidents are input into CAP
- Only incidents that include exposure to High Energy, or with the potential to be SIF-A or SIF-P classified, are entered to PG&E's CAP Tool
 - PG&E Safety Representatives to support when there are questions on high energy exposure or proximity, and err on the side of caution with incident reporting
- The FA Safety Representative will coordinate with the appropriate internal PG&E and Contractor teams to gather initial incident data

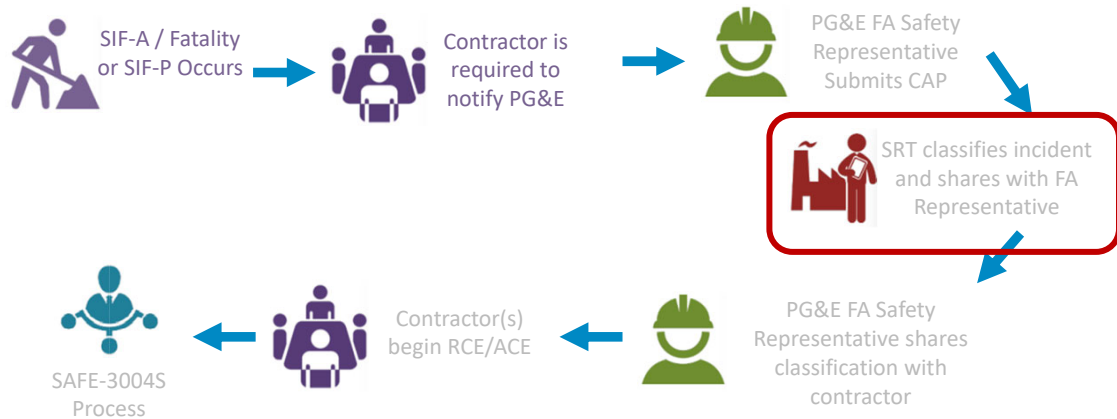
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Let's focus on when a SIF-A / Fatality or SIF-P Occurs...



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Responsibilities

FA SRT classifies incident and shares with FA Representative

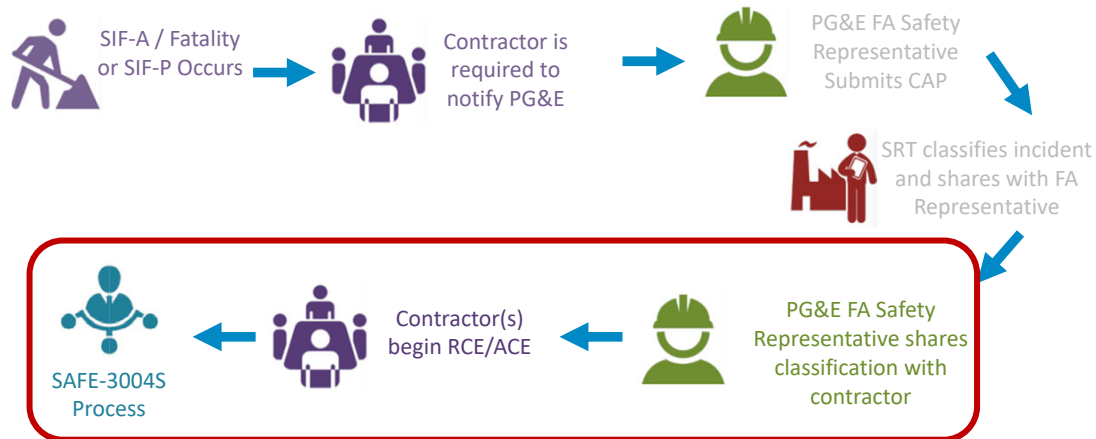
- The PG&E SIF Review Team (SRT) will review the incident for High Energy Exposure
 - If determined to be a SIF-A/Fatality: RCE Required
 - If determined to be a SIF-P: ACE Required
 - Not SIF events will follow Functional Area review processes, as applicable

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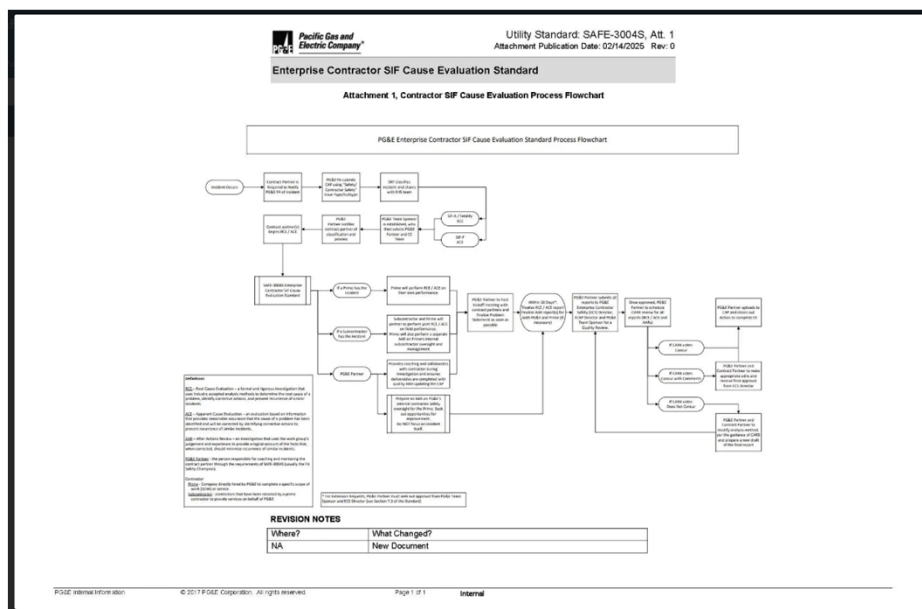
Let's focus on when a SIF-A / Fatality Occurs...



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SAFE-3004S Overview – Full Flowchart



- While dense, SAFE-3004S Attachment 1 lists every step for PG&E and the Contractor to complete, from Incident Reporting to Effectiveness Review

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SAFE-3004S Expectations



Contractor Expectation

- The contractor shall be the responsible party for generating all draft and final reports.
- SAFE-3004S Section 5 details the specific requirements of both the ACE and RCE reports. **Report template examples provided upon request.**
- Contractor shall also be open and communicative with the PG&E Partner **and participate and cooperate in PG&E's oversight AAR as requested.**

PG&E Partner (Safety Representative)

- This person shall be the point of contact with the Contractor
- They are to collaborate closely with the contractor / CE team to ensure work quality and deliverables are up to PG&E expectations
- They will also keep the CAP issues updated / closed out
- Complete an AAR (After Action Report) for all Contractor Cause Evaluations



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SAFE-3004S Process



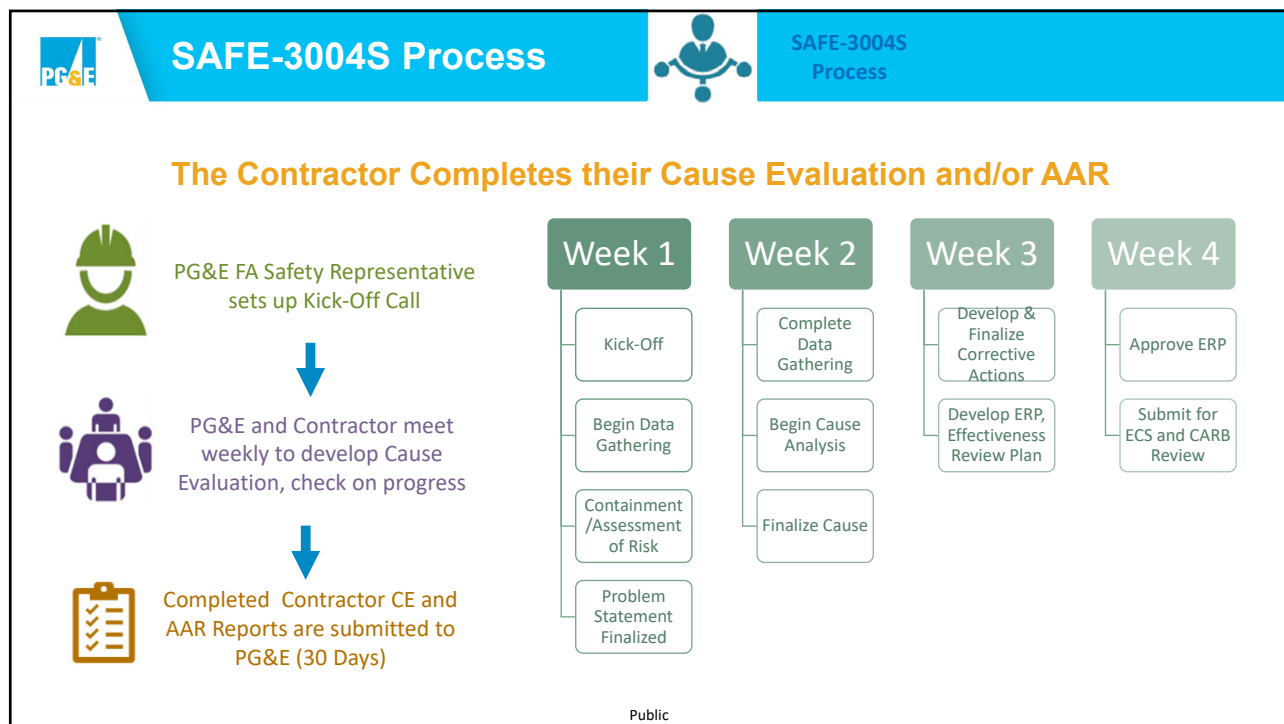
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Contractor(s) begin Cause Evaluation for SIF Incidents

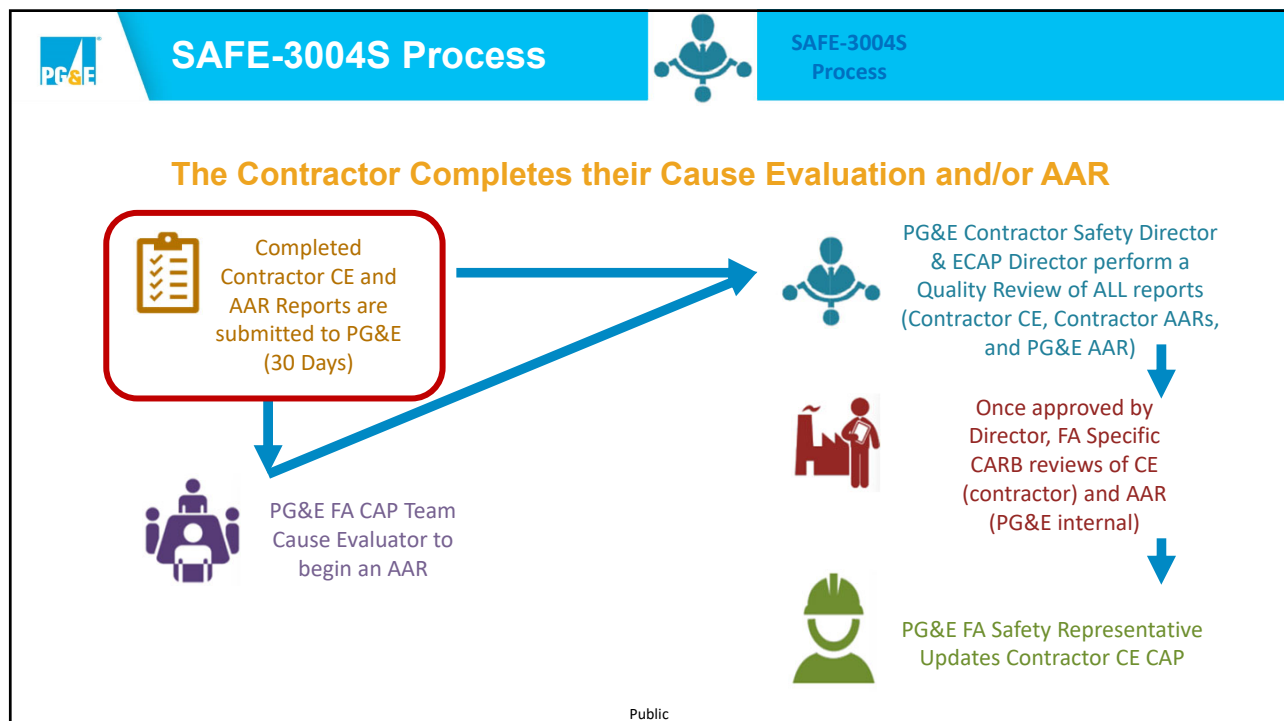
- If the Prime Contractor's actions led to a SIF incident:
 - The Prime shall perform the Cause Evaluation on themselves
 - PG&E completes AAR
- If a Subcontractor's actions led to a SIF incident:
 - The Prime and Subcontractor shall partner perform the Cause Evaluation
 - PG&E and Prime Complete AARs

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Process

Additional Flowchart Steps

1. Contractor Cause Evaluations must be complete and submitted for initial quality review within 30 days of SRT SIF classification
2. Cause Evaluations must include ERPs (Effectiveness Review Plans) to outline future steps for continued safety performance

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Process

The Contractor Completes their Cause Evaluation and/or AAR



Completed
Contractor CE and
AAR Reports are
submitted to PG&E
(30 Days)



PG&E FA CAP Team
Cause Evaluator to
begin an AAR



PG&E Contractor Safety Director
& ECAP Director perform a
Quality Review of ALL reports
(Contractor CE, Contractor AARs,
and PG&E AAR)



Once approved by
Director, FA Specific
CARB reviews of CE
(contractor) and AAR
(PG&E internal)



PG&E FA Safety Representative
Updates Contractor CE CAP

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Process

Contractor attend CARB Review Meeting to report on Cause Evaluation

- Following the completion and Quality Review of the CE, Contract Partners are required to report out on their CE findings at a PG&E CARB Meeting (Corrective Action Review Board)
 - CARB Meetings generally occur 1-2 weeks after completion/Quality Review
 - CARB Meetings give PG&E Safety Experts an opportunity to ask questions on the incident, CE analysis methods, and the Contractor's proposed Corrective Actions
 - CARB will either Concur, Concur with Comments, or Not Concur (send back for significant edits)
 - "Concur" ~ No Edits Required
 - "Concur With Comments" ~ Minor edits required before considered complete
 - "Not Concur" ~ Significant edits required before considered complete

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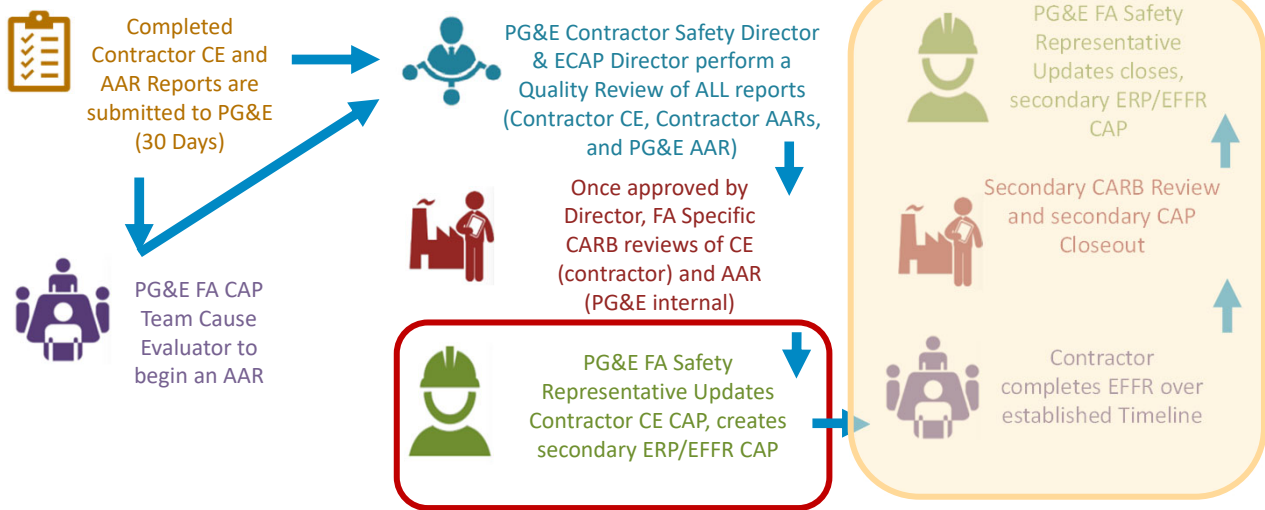


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Process

Next Steps: Secondary CAP, ERPs, and EFRs



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Secondary CAP and ERP

- Once CARB concurs with the Cause Evaluation and Effectiveness Review Plan, the PG&E Safety Representative will close out the Contractor SIF CAP
- PG&E Safety Representative will open a new CAP (linking the old CAP) with the ERP (Effectiveness Review Plan) to track future corrective actions
 - ERPs generally span 6-12 months after the initial CAP closeout to track completion of corrective action items

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Next Steps: Secondary CAP, ERPs, and EFRs



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Secondary CAP, ERP, and EFR

- At the completion of the ERP timeframe, Contract Partners will attend another CARB Review Meeting to report on their EFR and action items
- CARB can Concur, Concur with Comments, or Not Concur (send back for significant edits)
- Once CARB has concurred, PG&E Safety Representative to close out CAP
- SAFE-3004S Process is considered complete

Reminder: ERP (Effectiveness Review Plan) is the plan of how we will evaluate effectiveness. EFR (Effectiveness Review) is the actual quantitative review where effectiveness is measured.

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Contractor Resources

- Contract Partners without in-house Safety Professionals or Cause Evaluation Experts can leverage third-party companies to assist as needed
- SAFE-3004S Appendix B lists resources, templates, and analysis tool definitions for additional information if performing Cause Evaluations in-house

Appendix B, Cause Evaluation References and Resources for Contractors

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Refer to the following resources to develop an understanding of the required elements in CE. Note, the resources provide general information without specific instruction or endorsement from PG&E or its affiliates.

Bibliography	Author/Link
Root Cause Analysis Handbook, A Guide to Efficient and Effective Incident Investigation. ABS Consulting.	Lee N. Vanden Heuvel, Donald K Lorenzo, Laura O. Jackson, Walther E. Hanson, James J. Rooney, and David A Walker
Root Cause Analysis, Second Edition – The Core of Problem Solving and Corrective Action	Duke Okes
A Human Error Approach to Aviation Accident Analysis, The Human Factors Analysis and Classification (HFACS) System	Douglas A. Wiegmann and Scott A. Shappell
Harvard Business School Online Root Cause Analysis: What it is & How To Perform One	Root Cause Analysis: What It Is & How to Perform One HBS Online
Root Cause Analysis	Root cause analysis - Wikipedia
Cause Evaluation References/Templates, Training/Resources	Author/Link
WD Associates®	Cause Evaluation (teamwd.com)
Exponent®	Accident & Failure Investigation Exponent

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Questions or Comments

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