

Contractor Safety Oversight Procedure – Gas Operations

SUMMARY

This utility procedure establishes Pacific Gas and Electric Company (PG&E or Company) gas operations processes for managing the safety of contractors performing work on PG&E natural gas facilities and other applicable standards and procedures referenced in this document. This procedure does not cover the following key elements of contractor oversight:

- Specification adherence
- Quality control
- Final documentation

Level of Use: Informational Use

TARGET AUDIENCE

PG&E personnel who manage and oversee contracted and subcontracted work at PG&E Gas facilities, including work supervisors, inspectors, contract administrators, engineers, and other employees responsible for contractor oversight.

SAFETY

Every PG&E employee is responsible for maintaining the safety of the public, of PG&E team members, and contractors. This utility procedure supports and is governed by [SAFE-3001S](#), "[Contractor Safety Standard](#)." Adherence to this standard improves safety by ensuring the following:

- Contractors and subcontractors are prequalified before performing work.
- Contractor safety requirements have been included in the contract.
- An executed contract is in place before starting work.
- Safety hazards have been identified, planned for, and mitigated.

BEFORE YOU START

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

Before completing the instructions and tasks in this procedure, PG&E personnel must read and understand [SAFE-3001S](#) and the other reference documents listed.

Read this entire procedure before implementing it.

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PROCEDURE STEPS

1 Overview

- 1.1 This Contractor Safety Oversight Program for gas operations is scalable according to project size and risk.
- 1.2 Each gas leader must assess the project risk before hiring the contractor and determine the suitable level of oversight.
- 1.3 Large projects are typically those which are greater than \$1 million in contractor costs, more complicated than routine work, or high and medium risk projects.
- 1.4 Section 7 provides guidance on smaller high or medium risk projects (\$1 million or less in contractor costs).
- 1.5 This procedure is applicable only to contractors performing high and medium risk field work as matrixed in [SAFE-3001S](#).
- 1.6 Contractors and subcontractors performing low risk work are exempt from this procedure.
- 1.7 More communication regarding safety concerns is better than less communication.
- 1.8 See Table 1, “Risk and Oversight Matrix”.

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Table 1: Risk and Oversight Matrix – Publication Date 09/08/2017

Risk Category	Examples of Work Scopes or Work Activities	Primary Triggers
Low Risk	<ul style="list-style-type: none"> Consulting, classroom training Office engineering, design, inspection (limited to no direct exposure to site hazards) Project Management Office (PMO) services Basic landscaping services such as lawn mowing, trimming, and pruning (no trenching) Material delivery off PG&E premises (Shipping) Transportation of materials (limited to Material Handling off-site to PG&E premises) Unarmed security services 	<ul style="list-style-type: none"> Performs NO work activities covered in the Medium/High risk definitions Does NOT require ANY of the pre-requisites covered in the Medium/High risk definitions Does NOT require Occupational Safety and Health Administration (OSHA) safety and health programs to address specific criteria identified below under high and medium risk definitions, including any OSHA required training, to mitigate task and location specific hazards
Medium Risk	<ul style="list-style-type: none"> Excavating and trenching under 4 feet (excluding hand digging within 2 feet of depth) Geotechnical investigation, potholing, drilling, boring, horizontal directional drilling (HDD) Surveying, field inspection, construction management, engineering, design services that require specialized PPE Material Handling (on/off loading materials using mechanical electric or pneumatic equipment) Bulk hazardous chemicals transport and handling Compressed natural gas (CNG) / liquefied natural gas (LNG) handling 	<ul style="list-style-type: none"> Requires OSHA safety and health programs, including OSHA required training, to mitigate task and location specific hazards Work requires advanced or specialized PPE, beyond hard hat, safety boots, safety glasses and reflective vest (Examples: personal fall arrest/restraint system, respirator, SCBA, rubber gloves, ear plugs/hearing protection, Flame Resistant (FR) clothing, Electrical Hazard (EH) boots, Energy Control Locks, Tyvek suit, etc.) Work requires specialized training, formal training, licensing, certification or qualification (Examples: HVAC, Industrial Lift Truck, Permit Required Confined Space Training, Fall Protection Training, Crane Operator certification, pest control applicators license, FERC/NERC training, HAZWOPPER, etc.)
High Risk	<ul style="list-style-type: none"> Excavation and trenching beyond 4 feet (includes hand digging) Heavy equipment operation (crane, fork lift, front loader, backhoe, bobcat, bucket truck, aerial lift, boom lift, skidder) Underwater diving operations Aviation operations (helicopter, fixed wing) Demolition / blasting / explosive work Utility tree trimming, clearance work, vegetation management Hazardous waste disposal/treatment/transportation, contaminated soil, asbestos, lead, etc. General construction activities such as framing, sawing, cutting, welding, boring, blasting, coating, grinding, roofing, commercial painting using specialized equipment, electrical/gas installation, scaffolding, civil Traffic control flagging Pesticide, herbicide application Armed security services Welding and/or hot tapping of gas lines Electrical work Conductor stringing / sagging removal Fault protection / grounding Radiological handling activities 	<ul style="list-style-type: none"> Work <u>directly</u> exposes contract employee(s) to the hazards associated with the other work (Examples: Suspended load spotters, aggregate haulers where delivery of materials requires material handling or site hazard exposure, heavy equipment is in operation, traffic control flaggers)

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2 Roles and Responsibilities

2.1 This section describes the roles and responsibilities for the Contractor Safety Oversight Program.

2.2 Table 2 describes PG&E site representatives.

Table 2: Contractor Safety Oversight Program Responsibilities

Personnel	Description	Qualifications	Typical Job Titles	Responsibilities
Competent Site Representative	<ul style="list-style-type: none"> Personnel filling this role may include, but are not limited, to construction manager, lead inspector, construction supervisor, or construction working foreman. Directors and managers may authorize others (delegates), such as project managers or engineers, to fill the role of a PG&E site representative Ensures that PG&E-specific safety considerations have been communicated to the contractor before implementing the contract work. 	<ul style="list-style-type: none"> Capable of identifying existing and predictable hazards in the surroundings or working conditions that are unsanitary or dangerous Has training, knowledge, or experience related to the work to be performed and knowledge of the appropriate mitigation measures for the associated hazards. May have formal training to identify and mitigate hazards associated with specific high risk activities. Familiar with managing contractor safety for operations Familiar with SAFE-3001S Familiar with SAFE-1005S, "Personal Protective Equipment (PPE) Standard" Familiar with RISK-1002S, "Visitor Access Control Standard" Familiar with Cal/OSHA safety regulations and requirements 	<ul style="list-style-type: none"> Inspector (including contract inspectors) Construction and/or maintenance crew lead 	<ul style="list-style-type: none"> SELECTS the project team DETERMINES the level of contractor oversight needed. This process includes the: <ul style="list-style-type: none"> Scope of work and associated risks Potential for hazard exposure to anyone on or near the job Conditions required by SAFE-3001S. Worksite location Site access Environmental stewardship Available local knowledge regarding operational issues Other site-specific information In conjunction with the resource manager, the regional construction manager, or supervisor, DETERMINES the size and make-up of the field oversight staff according to the project size and risk level of the project hazards PROMOTES a safe work environment by ensuring that the contractor and the project team, at a minimum, clearly understand the roles and responsibilities related to: <ul style="list-style-type: none"> Reviewing drawings Identifying known hazards Communicating policies, standards, and procedures applicable to the work PROVIDES timely notification to management and the safety team about any safety issues ENSURES that a thorough initial tailboard is conducted by the contractor using the Site Specific Safety Plan (SSSP) and Job-site Safety Analysis (JSSA)

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Personnel	Description	Qualifications	Typical Job Titles	Responsibilities
Qualified Site Representative	Same as Competent Site Representative	<ul style="list-style-type: none"> Has formal training to identify and mitigate hazards associated with specific high-risk activities Has formal training in risk evaluation, safety management, and incident cause evaluation per Utility Standard GOV-6102S, "Enterprise Causal Evaluation." 	<ul style="list-style-type: none"> Inspector (including contract inspectors) 	<ul style="list-style-type: none"> Same as Competent Site Representative

2.3 Contractor Representatives and PG&E Safety Representative

- See Table 3.

Table 3: Contractor Representatives and PG&E Safety Representative

Representative	Description / Responsibilities
Contractor Representative and Contractor Safety Representative	<ul style="list-style-type: none"> Safety representative is anyone the prime contractor appoints as responsible for the health and safety of all personnel within the contractor's area of control. Either representative ensures compliance with PG&E and regulatory requirements specific to a facility, location, and site. Contractor must review and understand the roles and responsibilities outlined in the contract documents and the contractor's safety plan.
PG&E Safety Representative	<ul style="list-style-type: none"> Typically, a member of the Safety, Health, & Environment (SH&E) organization or Gas construction organization, (e.g. safety specialist) Responsibilities are outlined in SAFE-3001S and include: <ul style="list-style-type: none"> Ensuring required conditions for contractors/subcontractors are communicated to the project team. Compliance measures are in place. Support for this activity is typically provided by corporate contractor safety, Gas operations contracts, and/or sourcing.

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2.4 Project Team

1. The project team may consist of personnel from operations, maintenance, engineering, project management, transmission and distribution (T&D) construction, inspection, or others as needed.
2. ANYONE working on the site has the authority and responsibility to stop work if unsafe conditions develop.
 - All project team members may view Construction Onboarding Modules 1, 2, and 3 in Veriforce.
3. The project team:
 - a. Identifies institutional knowledge of the facilities related to the work.
 - b. Provides input in identifying the risks associated with the specific project work.
 - c. Identifies applicable PG&E-specific policies and procedures to follow.
 - d. Provides engineering review to support safe project implementation.
 - e. Responds in a timely manner to requests and is accountable for their commitments and deliverables.
 - f. Clarifies PG&E versus contractor scope.

2.5 Management

1. Gas operations directors, managers, and supervisors in each organization utilizing contractors endorse and support gas operation's application of this utility procedure as well as [SAFE-3001S](#).
2. Additional specific responsibilities include:
 - a. Participating in pre-construction safety meetings as appropriate.
 - b. Providing an avenue for escalation of safety issues.

2.6 Contractor

1. PG&E contractors are responsible for their Site-Specific Safety Plans (SSSPs) or Programmatic Safety Plans (PSPs) and safety processes.
2. Safety may not be compromised for any reason at any time.
3. Contractor must aim for zero safety-related incidents, including, but not limited to the following:

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2.6.3 (continued)

- Zero Notices of Violations (city, county, state or federal environmental regulations)
 - Zero motor vehicle incidents
 - Zero public safety-related incidents
 - Zero injuries to personnel working at the site that result in a Recordable Incident or Lost Work Day
 - Zero gas dig-ins, gas releases, or interruptions of service
4. Contractors must ensure all their employees and subcontractor personnel understand that they:
- Have the authority to “Stop Work” due to any unsafe work processes or hazards or sub-standard quality work.
 - Will not, in any way, adversely affect the requestor’s work status or job security (i.e., they will be protected from any/all potential retribution) for stopping work.2.6 (continued)
5. The contractor’s SSSP or PSP must fulfill PG&E safety program requirements cited in the Master Service Agreement and CWA Safety Documents, including, but not limited to:
- MSA Specification #13024 (March 15, 2009)
 - MSA Attachment 2-General Conditions (June 22, 2009)
 - Safety document titled “Excavation Procedures for Damage Prevention – TD-4412P-05” (if excavating)
 - Safety document titled “Site-Specific Safety Plan” or “Programmatic Safety Plan”
6. A SSSP or PSP must be completed by High Risk Contractor. SSSPs are for large contractor projects with limited PG&E oversight. PSPs are for contractors typically working as a sub-contractor to a PG&E crew performing routine tasks.
7. Contractor may only mobilize or start work until AFTER:
- a. Submitting an SSSP or PSP to the appropriate PG&E construction or maintenance and construction (M&C) and to the Gas construction safety department management teams per instructions in the “Submittals” paragraph of the Project Specific Information section of the contract

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2.6.7 (continued)

- b. The SSSP or PSP has been reviewed and approved by PG&E's construction or M&C and safety department management teams.
8. Should a safety incident occur, the contractor must notify PG&E staff **in the following order**:
 - a. Construction manager/On-site PG&E Person In Charge (Supervisor or Foremen)
 - b. Regional construction manager (if applicable)
 - c. Gas division safety manager
 - d. Safety Specialist
 - e. Project manager
9. IF the contractor has any questions regarding PG&E safety procedures and/or safety requirements,

THEN the contractor must contact the PG&E construction or M&C representative for guidance and clarifications.
10. PG&E's primary point of contact (POC) for both technical and safety-related matters must be the PG&E construction manager, or the appropriate general construction (GC) or M&C representative.
11. The contractor must maintain records at the job site as described in the SSSP.
12. SSSP Submittal Requirements:
 - a. SSSP must be submitted and approved prior to start of the work in the field.
 - Instructions for uploading safety plans and downloading PG&E safety requirement documents from the Unifier system are defined in PSI Attachment entitled "Access Instructions for PG&E Unifier Document Management System."
 - b. Contractors will brief all of their personnel and sub-contractors on the SSSP and required mitigation methods, including updating same personnel on all plan changes.
 - c. Continuously update the SSSP throughout the course of the project, as required, to identify new hazards and incorporate new safety-related activities.

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2.6.12 (continued)

- d. All costs associated with mitigating site safety hazards and implementing required safety requirements per the SSSP must be included in the contractor's project proposal price.
13. PSP Submittal Requirements:
 - a. PSP must be submitted and approved prior to start of the work in the field.
 - ISN will send all High Risk Contractors a PSP template that must be uploaded to ISN for PG&E review.
 - b. PSP will include Leadership commitments, contact information; typical hazards associated with their work and mitigation measures to address the hazards.
 - c. PSP must be reviewed and approved on an annual basis by the responsible LOB department that uses the contractor the most.
 14. The PG&E LOB Safety Department staff will:
 - Periodically check to ensure job sites are safe and to verify that the contractors are adhering to their SSSP or PSP.
 - Provide the contractor's management team with a site inspection summary that includes a list of any safety program shortcomings noted during the site check.
 - The summary will include guidance regarding corrective and preventive actions the contractor must immediately implement to correct noted shortcomings.
 15. The contractor must:
 - a. Include comprehensive incident analysis with corrective and preventive action report.
 - b. Notify the PG&E LOB Safety Management team, in writing, when all required actions have been completed.
 - c. Report significant safety-related incidents/events is shown in Table 4.

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2.6 (continued)

Table 4: Report requirements for significant safety-related incidents/events

Safety-Related Event	Verbal Reporting Time Deadline	Written Report Deadline
Death/Injury of site workers or public person	Immediately	24 hours
Near-Hit Incidents	24 hours	24 hours
Gas Line Strike or Damage	Immediately call Gas Control GT North – 800-811-4111 GT South – 800-547-5995 GD – Bay Area – 925-244-4202 GD – Central Coast – 925-244-4203 GD – Central Valley – 925.244-4204 GD – North – 925-244-4201	24 hours
Discovery and Mitigation Methods of Newly Identified Site Hazards	72 hours	5 work days
Damage to Public or Private Property	Immediately	24 hours

16. The prime contractor is responsible for any work done over due to contractor or sub-contractor negligence, unsafe work procedures, or faulty materials/workmanship.
17. The contractor must write emergency plans, if applicable to the work, to cover actions required for:
 - Emergency Medical Care
 - Excavation/Trench Rescue (i.e., “Cave-Ins”)
 - Confined Space Plan
 - HAZMAT Spill Response Plan
18. Each of above emergency plans must meet federal, state, and local requirements.
19. Emergency plans for items (b), (c), and (d) above will be kept at the contractor’s on-site office for review by PG&E management staff.
20. Site emergency plans must include the names and contact information for key contractor and PG&E personnel as shown in the PG&E site safety plan format.

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2.6 (continued)

21. Stop Work Authority

- Any PG&E or contractor employee on any project site is granted the right to stop any unsafe or sub-standard quality work.
- This stop work authority must be clearly communicated to every worker via the onboarding process.

NOTE

Contract Precedence—Conflict in Safety Requirements.

Any PG&E safety requirements cited in the Project-Specific Information sheet or Unifier System Safety Requirement documents supersede those in the MSA agreements.

3 Managing Contractor Safety on Larger Projects (> \$1M in Contractor Costs)

3.1 Pre-Construction

1. Contract management (CM) (see [SAFE-3001S](#), Sections 2.2. through 2.26)
 - a. Creates a well-defined scope of work to aid with job hazard assessments.
 - b. Supports supply chain personnel OR an authorized PG&E procurement representative to evaluate and select contractors, based on pre-qualification requirements in [SAFE-3001S](#).
 - c. Partners with safety representative OR a third-party expert to establish PG&E requirements, regulatory requirements, and control measures to eliminate or mitigate hazards specific to the job before starting work.
 - d. Verifies that contractors have:
 - Completed PG&E's pre-qualification process before starting work. In emergency/emergent work situations (see [SAFE-3001S](#), Section 4).
 - Established criteria to meet or exceed PG&E's minimum field oversight expectations (see [SAFE-3001S, Appendix A, "Risk and Oversight Matrix"](#)) and have also completed PG&E's pre-qualification process before starting work.

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3.1.1 (continued)

- e. Partners with supply chain personnel OR authorized PG&E procurement representative to submit a Governance Request for contractors/subcontractors that **do not** meet PG&E's pre-qualification safety criteria (see [SAFE-3001S](#)).
2. Gas Operations PMO, Construction Management (CM), and Contracts in collaboration with sourcing ASSIST in determining the type of contract, identifying vendors, scheduling, and developing the contract package.

NOTE

The steps required to ensure a safe work environment vary depending on the unique circumstances of each job. Factors to consider include:

- Work scope
- Location
- Available knowledge
- Potential exposure and risk associated with the work and PG&E assets

3. The project team completes the following pre-construction activities:
 - a. Defines the scope of work and the applicable PG&E policies, procedures, standards, permits, and drawings for inclusion in the contract package.
 - b. Issues and utilizes the following documents to oversee the contract work:
Discipline-specific "Contractor Safety Checklists" (Attachments 1 – 6)
 - c. Confirms if any proposed contractors or subcontractors have conditional approval to perform work per [SAFE-3001S](#).
 - d. Provides applicable conditions for approval per [SAFE-3001S](#) to site representative before starting work.
 - e. Ensures an SSSP is developed and available to the site representative before starting work.

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3.1.3.e (continued)

NOTE

Items (1) and (2) below are not all-inclusive nor do they replace the contractor's own safety program.

PG&E may share safety information with a contractor to protect PG&E personnel, contractor employees, the general public, and property from injury and damage.

Contractors are independent agents and must plan and conduct the work to safeguard persons and property.

- The discipline-specific JSSA/SSSP must be filled out and communicated at a tailboard with the contractor and PG&E employees involved in the work before starting physical work.
 - The SSSP identifies potential hazards or issues that could be encountered in performing the work.
4. Contractors are responsible for the following:
- a. Safely performing work.
 - PG&E remains responsible at all times for ensuring compliance with applicable California Public Utilities Commission safety rules and regulations.
 - b. Before contractors or subcontractors start work on PG&E facilities, the PG&E site representative must confirm that the contractor and subcontractors have completed the following:
 - All contractor employees and their sub-contractors have completed and passed Contractor Onboarding Modules 1.0, 2.0, and 3.0 in Veriforce.
 - A contractor SSSP has been submitted to and accepted by PG&E, which includes, at a minimum, the following:
 - Plan to implement all work in accordance with all local, state, federal, and PG&E-specific safety regulations.
 - Before starting work, contractors must identify work tasks, associated hazards, and actions to be taken by the contractor to prevent injuries.

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- Contractor is required to communicate and ensure adherence to applicable policies, standards, procedures, specifications, drawings, and conditions of the contract.
- Plan to immediately notify the PG&E site representative of any injury or medical emergency that occurs while on PG&E property.
- Contractor must provide a written incident report within 24 to 72 hours including a causal analysis as defined in this document.
- Prior to commencement of work, the PG&E safety representative and PG&E site representative:
 - Review the adequacy of the safety plan, including contractor safety personnel qualifications where applicable.
 - Perform a safety assessment to evaluate whether additional safety mitigations are required.
 - IF the project team determines that additional expertise is required,

THEN PG&E will engage third-party experts to perform the analysis.

3.2 Pre-Construction Safety Meeting/Safety Kick-Off

1. For all major construction projects that are led by an outside contractor, the PG&E site representative will participate in the pre-construction safety meeting before a contractor mobilizes to the project site.
 - a. Meeting includes the PG&E project team that is responsible for contractor oversight.
 - b. Contractor keeps and manages sign-in sheets for this kick-off meeting. The attendees for this meeting include the following:
 - Contractor and their sub-contractors
 - Project manager
 - PG&E site representative
 - PG&E safety specialist

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3.2.1.b (continued)

- Area project engineering supervisor
 - Representative from PG&E's Corporate Contractor Safety group (optional)
 - Director of project execution and the manager of project engineering (optional)
- c. The agenda for the kick-off meeting must include, but is not limited to:
- Reviewing the daily JSSA requirements.
 - Discussing roles and responsibilities for each team member.
 - Discussing construction safety risks and how they will be mitigated.
 - Reviewing and verifying a communication plan relative to safety.
 - Creating field work notifications and an emergency response plan.

4 Construction

4.1 Construction Oversight

The PG&E site representative:

- a. Observes the contractor's adherence to contractor's safety plan, daily JSSA, and general safe practices.
- b. IF the PG&E site representative OBSERVES unsafe practices or a violation of the contractor's safety plan or JSSA,

THEN the PG&E site representative STOPS the activity or all work on the project if necessary, until the contractor develops and implements corrective actions and communicates corrective actions to the on-site team.

NOTE

It is everyone's responsibility to escalate a safety concern if they believe corrective actions have not properly addressed safety concerns.

- c. Communicates the safety issue per PG&E's safety reporting requirements.
- d. Actively participates in the daily tailboard meetings led by the contractor to ensure that:

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4.1.d (continued)

- Safety is planned for the day.
- The contractor's JSSA addresses all foreseeable hazards associated with the activities planned for the day.

The discipline-specific SSSP is used as a reference to identify potential hazards that must be addressed.

- Changed conditions are identified and addressed in the contractor's safety plan.
- Best practices are discussed and incorporated.

4.2 Field Safety Observations

1. The worksite team participates in periodic field safety observation to be supported by the PG&E safety representative.
2. The PG&E site representative notifies the PG&E safety representative of the project construction schedule before construction begins.
3. The PG&E safety representative:
 - a. Develops the field safety observation criteria.
 - b. Determines the frequency of field safety observations, considering the risks associated with the scope of work per [SAFE-3001S](#).
4. After completing the field safety observation, the PG&E site representative and the PG&E safety representative REVIEW the results of the field safety observation with contractor's site representative.
5. PG&E may require the contractor to develop an action plan to address any field safety observation issues, especially if they are significant or systemic issues.
6. The contractor site representative CAPTURES best practices and SHARES them with the contractor team for implementation.
7. The PG&E safety representative DOCUMENTS the contractor's completion of action items resulting from the field safety observation.

5 Post-Construction

- 5.1 The PG&E site representative ENSURES that the Contractor Performance Evaluation Form is completed for major projects and is uploaded to Unifier.

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5.1 (continued)

- The form must be completed in a timely manner at the completion of construction activities on major projects, or annually for multi-year projects.

5.2 Post-construction lessons learned meeting is conducted and documented in Unifier on major projects.

5.3 All contractor performance must be entered into ISN. The frequency is determined by the business unit, but must be done annually at a minimum.

6 Documentation

6.1 The PG&E safety representative collects all safety related documentation and includes it in the final inspection report to be filed on the shared drive and Unifier.

6.2 The final safety-related documentation must include, but is not limited to, the following:

- Site Specific Safety Plan
- Documentation of all certifications and qualifications for site personnel
- Safety incident analysis reports
- Safety Quality Good Catch Forms (near- hit)
- Daily tailboards and JSSAs
- Field safety observation documentation
- Contractor Project Specific Performance Evaluations (see Attachment 5)

6.3 The PG&E safety representative ENSURES that the appropriate safety-related documentation is properly filed.

6.4 Recordkeeping

- Retain records per the record retention schedule.

7 Managing Contractor Safety on Smaller Projects (< \$1M in Contractor Costs) or Sub-Contractors supporting Maintenance and Construction Operations

7.1 Minimum Requirements

1. On smaller projects, the Gas responsible leader (director, manager, superintendent, and supervisor) overseeing the work ensures the following minimum requirements are met:

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7.1.1 (Continued)

- a. The scope of work is clearly defined for all parties through the Contract Work Authorization (CWA) or Blanket Purchase Order (BPO).
- b. Qualified, trained contractors are selected.
- c. Safety hazards are identified and communicated effectively between all parties involved through a tailboard or review of the contractor's PSP.
- d. Contractors develop, implement, and adhere to comprehensive safety plans that address the unique challenges of working on PG&E's natural gas facilities.
- e. Proper job safety oversight is provided.

7.2 Specific Requirements

1. The responsible Gas leader reviews each project to determine the specific level of oversight according to project risk.

NOTE

All of the processes and forms used for larger projects may also be used for smaller projects. Variations of these forms may be used to document risk identification and mitigation measures and to demonstrate that all of the above minimum requirements (Section 6.1, 1 through 5) have been met.

2. At a minimum, the responsible Gas leader ensures the following:
 - a. The job scope is understood by all parties.
 - The contractor's scope of work is clearly defined, including distinguishing between contractor's responsibilities and PG&E's responsibilities.
 - The contractor's field supervision clearly understands this scope of work prior to start of contractor field activities.
 - The scope of work must be clearly communicated and understood as part of project kick off meeting if one occurs or at a minimum as part of the JSSA.
 - b. Qualified, trained contractors are selected.
 - Only PG&E approved contractors may perform the work.
 -

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7.2.2 (Continued)

- This requirement specifically includes contractors with an acceptable status in ISN and Gold Shovel Program (if contractor performs excavation activities).
- Governance may be required for contractors with sub-par grades in ISN or Gold Shovel.
- c. Safety hazards are identified and communicated effectively to all parties involved.
 - This includes specifically holding a project kick off meeting or, at a minimum, a JSSA and tailboard, to review:
 - The project scope of work.
 - All hazards associated with the work.
 - Permit conditions.
 - Applicable PG&E safety policies.
 - The PG&E SSSP, if one has been prepared for the project.
 - The emergency response plan.
 - Place special emphasis on:
 - The right and obligation to stop unsafe work.
 - Requirements for completing and documenting a JSSA and holding safety tailboards with the entire job crew on a daily basis, at the start of the shift, or more frequently whenever conditions change. **NOTE:** For contractors transporting hazardous materials (for example, LNG/CNG), refer to attachment 7 for guidance.
 - The requirement to keep records of all projects and JSSA/safety tailboards and make them available to PG&E if requested.
 - An emergency response plan for each project, including providing closest medical facility and jobsite address. This notification may take the form of a white board placard on the back of a crew truck.

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7.2.2 (Continued)

- The obligation to report all safety incidents as outlined in Table 3 above including Attachment.4, “Incident Report Form.”
 - The requirements of the “Emergency Notification,” process (Table 4) and the communication of Gas Control Emergency phone numbers for reporting any dig -ins or gas leaks.
 - The requirement that appropriate personnel on-boarding is completed and documented as determined by the responsible Gas leader. This can include a kick-off project tailboard to on-board contractors. On-line on-boarding, a video or job-walk prior to the start of work are all acceptable means of on-boarding a contractor to discuss the specific hazards associated with the project or task.
- d. Contractors:
- Develop, implement, and adhere to comprehensive safety plans that address the unique challenges of working on PG&E’s natural gas facilities.
 - Conduct a JSSA and safety tailboard with all construction personnel at a minimum once daily at the beginning of every shift or whenever conditions change.
 - Retain all projects’ JSSAs/safety tailboards onsite during the project and for a minimum of 36 months after the project is completed. These records will be made available to PG&E personnel whenever requested.
3. Ensures proper job safety oversight is provided.
- a. The responsible Gas leader:
- Provides adequate job safety oversight depending on project risk and duration
 - This oversight may include, as needed, full time safety oversight or may include regular, spot, or random individual jobsite, job bundles, or program visits as determined on a case by case basis.
 - Visits worksites and performs regular or randomized safety observations suitable for the work performed. At a minimum, these observations ensure:

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7.3 (Continued)

- Adequate JSSAs are completed daily/per shift and are followed by the contractor(s). NOTE: For contractors transporting hazardous materials (for example, LNG/CNG), refer to attachment 7 for guidance.
- All applicable safety policies are being followed, including Cal/OSHA and PG&E policies as well as the SSSP if one exists.
- An excavation competent person is on site 100% of time anytime excavation work is being performed or personnel are working inside excavations.
- The field visit and safety observation is documented in a suitable tool. PG&E Guardian tool, Attachment 4, or other suitable tools may be used for this purpose.
- A suitable Contractor Performance Evaluation (Attachment 5) is conducted, documented, and shared with the contractor at the end of each project or group/bundle of small jobs or other suitable interval.

For groups of smaller jobs, one contractor evaluation per region per quarter is suggested.

- Verifies an adequate emergency plan exists.
- Confirms that field employees understand the emergency plan

8 Managing Transportation of LNG/CNG or other Hazardous Materials

8.1 Projects over or under \$1M apply to LNG/CNG operations.

1. Section 8 pertains to the oversight requirements related to transporting LNG/CNG to worksites and other locations.

8.2 Requirements for completing and documenting a JSSA and conducting a tailboard are required for all transport operations. For more details refer to attachment 7 – JSSA Matrix for LNG/CNG transportation operations.

END of Instructions

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DEFINITIONS

Causal Analysis – An evaluation of all factors that contributed to an incident. There may be one or more causal factors, and each factor must be analyzed to determine why that causal factor occurred. Elements that may be considered include, but are not limited to the following: personnel/staffing, leadership, equipment, environment, policies, and procedures. A causal analysis does not necessarily lead to a single root cause, but should generate corrective actions to address each causal factor.

Competent Site Representative – A designated individual, typically a supervisor or regional construction manager, authorized to make decisions impacting safety, schedule, production, and project costs.

Contractor – A company directly hired by PG&E to complete a specific scope of work or service. Throughout this document, references to contractor include all subcontracted resources.

Contractor Site-Specific Safety Plan (SSSP) – Detailed safety plan created by the contractor to eliminate or mitigate specific job site environmental, health, and safety hazards associated with the scope of work. In this document, the SSSP is referred to as the “contractor safety plan.”

High Risk Contractors – Contractors or subcontractors performing work that directly exposes their employees to PG&E systems, assets, or processes associated with Power Generation, Gas or Electric transmission or distribution operations. This term also includes contractors whose work requires any of the following:

- Bodily entry into a confined space or hazardous environment.
- Applying lockout/tagout (LOTO) devices as part of hazardous energy control
- Working at a height that requires the use of fall arresting equipment
- Entering an excavation greater than 4 feet deep
- Demolition activities
- The use of explosive devices
- Commercial diving
- Aviation services
- Vegetative management beyond weed control
- Handling or transporting hazardous chemicals.

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Job-Site Safety Analysis (JSSA) – Identifying hazards, evaluate and prioritize the hazards for control, select appropriate controls, and evaluate the controls for any given job task to improve work practices and promote a safe work environment.

Low-Risk Contractor – Contractors or subcontractors NOT working on or exposed to any hazards associated with Power Generation, Gas or Electric transmission or distribution processes or process-related equipment or working within designated construction areas. These contractors are exempt from this utility procedure and its standard. Work requires minimal advance planning, preparation, formal training, or work controls.

Medium Risk Contractor– Contractor whose work requires advanced planning, preparation, formal training, work controls, and audit/oversight, or specialized personal protective equipment (PPE) beyond hardhat, safety glasses, safety toed footwear or high visibility vests. Contractors or subcontractors that do NOT meet the definition of high or low risk

Near-Hit – An unplanned event that did not result in injury to employees, contractors, or the public, and did not result in damage to Company assets

Examples of near hits include potential

- Disruption of service
- Personal safety or hazardous conditions, such as driving

PG&E Safety Representative – PG&E individual recognized by degree, certification, knowledge, or experience as a health and safety subject matter expert (SME) who has decision-making authority for ensuring safety compliance.

Responsible Gas Leader –The PG&E Gas director, manager, superintendent, supervisor, or his delegate who the work is being performed for and/or who has been appointed to oversee the work.

Safety and Quality Good Catch – A proactive approach to identify safety or quality issues that include stopping any unsafe or non-quality work or activity and coaching a fellow team member

Stop Work – Deliberate act of stopping work to eliminate or effectively control unsafe work or sub-standard quality work, practice, or behavior.

IMPLEMENTATION RESPONSIBILITIES

Directors and managers/ superintendents in Gas operations are responsible for communicating and implementing this procedure within their respective organizations and for ensuring it is being adhered to going forward.

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GOVERNING DOCUMENT

[SAFE-3001S, “Contractor Safety Standard”](#)

COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

Cal/OSHA Title 8 Regulations

REFERENCE DOCUMENTS

Developmental References:

Cal/OSHA [Form 301, “Injury and Illness Incident Report”](#)

[LAW-2001S, “Contracting Requirements Standards”](#)

PG&E’s [Code of Safe Practices](#)

PG&E’s [Hazard Reference Guide for Contract Work](#)

PG&E’s [Procurement Manual](#)

[SAFE-1001S, “Safety and Health Program Standard”](#)

[TD-4412P-05 – Excavation Procedures for Damage Prevention](#)

Supplemental References:

N/A

APPENDICES

Appendix A, “Process Map”

ATTACHMENTS

Attachment 1, [“Site Specific Safety Plan Template”](#)

Attachment 2, [“Incident Report Form”](#)

Attachment 3, [“Good Catch/Quality Catch/Near Hit”](#)

Attachment 4, [“Sample Safety Checklist/Observation Form”](#)

Attachment 5, [“Sample Contractor Project Specific Performance Evaluation”](#)

Attachment 6, [“Sample Lessons Learned Form”](#)

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Attachment 7, "[JSSA Matrix for LNG/CNG transportation operations](#)"

DOCUMENT REVISION

NA

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REVISION NOTES

Where?	What Changed?
TOC	Added Sub Contractor reference for M&C ops and added Section 8 for LNG/CNG guidance
Table 1	Updated the Risk and Oversight Matrix
Section 2.6.5 - 8	Removed redundant language captured in other sections of the procedure. (SSSP development)
Section 2.6.10 – 2.6.17	Added Programmatic Safety Plan term and definition throughout the procedure starting at Section 2.6.10.
Attachment 7	Added Att 7 to address LNG/CNG transporting hazard material JSSA requirements
Section 8	Added Section 8 Managing Transportation of LNG/CNG or other Hazardous Material requirements for documenting JSSAs and Tailboards.
Document Owner	Changed document owner to Kcammee Vreman

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Appendix A, Process Map

