

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans
Rulemaking 18-10-007
Data Response

PG&E Data Request No.:	CalAdvocates_037-Q02		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_037-Q02		
Request Date:	February 11, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-03
Date Sent:	February 17, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

The following questions relate to PG&E's responses to data request CalAdvocates-PGE-R1810007-32.

QUESTION 02

- a) Please explain PG&E's current processes for disseminating procedures and revisions of procedures to contractors.
- b) Please explain PG&E's current processes for ensuring a contractor is following the correct procedure (e.g., routine audits, meetings with contractor staff, routine training, etc.).
- c) Please provide copies of any memoranda, procedures, or process documents that outline the processes discussed in Questions 2(a) and 2(b).

ANSWER 02

PG&E understands that this question is in the context of the Pole Test & Treat Program and thus this response addresses contractor work on electric distribution facilities. This response does not address other programs related to transmission facilities, substations or vegetation management. Some of these other non-electric distribution programs are addressed in separate data requests included in this data request set.

- a) With regard to electric distribution facilities, PG&E's agreements with contractors require that the contractor follow certain safety rules and PG&E building and construction requirements. Specific Conditions 6603 Ver. 2.5 - Electric Overhead, Underground, and Civil Construction (Specific Conditions), which is incorporated into PG&E's agreements, lists out what procedures and/or standards are to be used when carrying out specific work such as excavating, installing, replacing, modifying, undergrounding and upgrading of overhead and underground electric distribution facilities and underground conduit performed on behalf of PG&E and/or Joint Parties. Please see *"WildfireMitigationPlans_DR_CalAdvocates_037-Q02-Atch01_CONF.pdf"* which is a copy of the Specific Conditions. The Specific Conditions include provisions regarding direct access to PG&E's Technical Information Library which includes PG&E procedures (see Specific Conditions §2) as well lists of specific procedures, rules, and safety requirements incorporated into the Agreement (see Specific Conditions §3). The Specific Conditions also require that contractors "obtain, review and comply with the latest version of each document" incorporated into the Specific Conditions, including relevant PG&E

procedures as well as CPUC General orders and contractor safety standards. See Specific Conditions, § 2.1.4 and §3.1 (incorporating PG&E procedures). The Specific Conditions specify that the contractor is responsible for making sure that they are using the most current procedures. PG&E generally does not dictate to a contractor what work methods the contractor uses to accomplish its contractual commitments. There are limited cases where PG&E requires contractors to follow PG&E work methods. In these cases, we share updates via written notification (email) and on regularly held conference calls. If needed, in-person training can be scheduled on a case-by-case basis.

- b) With regard to electric distribution facilities, while PG&E does not dictate what work methods the contractors use to accomplish a task, PG&E performs multiple types of job site observations that observe work methods. These include: (1) safety audits which are performed by Enterprise Health and Safety; and (2) job oversight duties performed by a PG&E representative who assists in facilitating the job completion. PG&E also performs field safety observations of contract crews and will provide corrective coaching if specific procedures are not followed. These observations are documented in the SafetyNet observation program.
- c) PG&E objects to the request for “any” memoranda, procedures, or process documents as overbroad and burdensome. Subject to and without waiving this objection, with regard to electric distribution facilities, please refer below for documents that outline the processes discussed in the responses to Questions 2(a) and 2(b), as well as for examples of communications held with contractors regarding work procedures and revisions or updates to procedures.
 - 1. Specific Conditions 6603 Ver. 2.5 - Electric Overhead, Underground, and Civil Construction This document lists out what procedures and/or standards are to be used when carrying out work related to specific conditions related to excavating, installing, replacing, modifying, undergrounding and upgrading of overhead and underground electric facilities and underground conduit performed on behalf of PG&E and/or Joint Parties. Please see *“WildfireMitigationPlans_DR_CalAdvocates_037-Q02-Atch01_CONF.pdf.”*
 - 2. SAFE-3001S – Standard establishes minimum requirements for contractor safety management and ensures that health and safety expectations associated with the work performed on behalf of PG&E are understood and communicated. Please see *“WildfireMitigationPlans_DR_CalAdvocates_037-Q02-Atch02_CONF.pdf.”* This safety standard is expressly incorporated into the Specific Conditions. See Specific Conditions, §3.1.
 - 3. California Safety Manual Code of Safe Work Practices Accident Prevention Rules (Red Book) includes accident prevention rules outlined by the State of California. Please see *“WildfireMitigationPlans_DR_CalAdvocates_037-Q02-Atch03.pdf.”*
 - 4. Please see *“WildfireMitigationPlans_DR_CalAdvocates_037-Q02-Atch04_CONF.pdf”*, *“WildfireMitigationPlans_DR_CalAdvocates_037-Q02-Atch05_CONF.pdf”*, *“WildfireMitigationPlans_DR_CalAdvocates_037-Q02-*

Atch06_CONF.zip, “*WildfireMitigationPlans_DR_CalAdvocates_037-Q02-Atch07_CONF.zip*”, and “*WildfireMitigationPlans_DR_CalAdvocates_037-Q02-Atch08_CONF.zip*” for examples of conference calls held with contractors regarding electric distribution contractor safety and communication of PG&E work procedures to contractor in response to work procedure errors.