Gas Safety Excellence Policy

Pacific Gas and Electric Company (PG&E or Company) is committed to the safe, reliable, affordable, and clean operation and management of its gas transmission and distribution system for its employees, contractors, customers, and the public. Gas Operations has developed a safety management system, Gas Safety Excellence (GSE), which is based on three pillars: Asset Management, Safety Culture, and Process Safety. This system complies with:

- Corporate Policy SAFE-01, “Enterprise Safety Management System Policy”
- PAS 55/ISO 55001, industry-recognized standards for asset management
- The American Petroleum Institute (API) Recommended Practice (API RP) 1173 specification for pipeline safety management
- The American Chemistry Council’s Responsible Care Management System Certification, RC14001, a global standard combining the elements of ISO 14001 and Responsible Care’s guiding principles, associated with improving process safety and impact on the environment, health, safety and security (EHS&S)

This safety management system helps to proactively manage PG&E’s safety culture, the condition of gas assets, the identification and reduction of operational and enterprise risk, and the continued support of processes and procedures related to process safety, employee and contractor safety, security, communications, emergency response, and environmental stewardship.

This framework includes the following operating principles, aspirations, approach, and expectations:

- Fostering a “safety first” culture where employees and contractors understand the vision, strategic plans, and the role they play in meeting PG&E’s objectives
- Creating an environment where employees and contractors feel empowered to report and raise safety and compliance issues by using a non-punitive, self-reporting corrective action system, or other means
- Understanding the criticality and condition of assets, mitigating associated risks, and managing system performance at an affordable cost over the life cycle of gas assets
- Complying with legal, regulatory, and other requirements, including applicable EHS&S laws and regulations through systems to identify these requirements, determine applicability, implement programs, and assess compliance
• Applying asset management and process safety principles to manage assets throughout their life cycle to protect employees, contractors, the public, the environment, and property

• Implementing proactive environmental stewardship and protection with the intent of reducing methane emissions and preventing other pollution to preserve the environment for the health, productivity, and enjoyment of future generations

• Communicating our business operations and potential risks, both internally and externally, to promote openness and transparency with our stakeholders

• Maintaining and making accessible to all relevant users accurate, traceable, verifiable, and complete asset information, including all data and records

• Maintaining up-to-date documentation (such as standards, procedures, and as-built documents) to manage gas assets throughout their life cycle, and ensuring updates to documentation are effectively communicated

• Verifying that employees, contractors, and subcontractors are competent, trained, and qualified to design, construct, manage, operate, maintain, and retire assets, and that they understand their critical role in applying our safety management system

• Assessing and managing all major changes to assets, processes, organizations, and technologies to manage risk and deliver safe, reliable, affordable, and clean service

• Establishing and maintaining appropriate Key Performance Indicators that measure progress against line-of-sight goals

• Investigating and analyzing safety-related incidents to determine root causes, developing corrective actions, and conducting quality reviews as appropriate

• Regularly benchmarking the safety management system performance internally and externally, and using the findings for continual improvement

• Maintaining the safety management system in accordance with SAFE-01, PAS 55, ISO 55001, API RP 1173, and RC14001

This policy directs PG&E Gas Operations to develop and maintain a safety management system aligned with the requirements of all elements of GSE (including PAS 55, ISO 55001, API RP 1173, and RC14001 standards), and to continually review and improve this system to assure that it remains suitable, adequate, and effective. In addition, this policy provides the structure to continue our journey to becoming the safest, most reliable, affordable, and cleanest gas company in the nation.