

December 18, 2023

**Advice Letter No. 4806-G/7036-E**

Sidney Bob Dietz II  
Director, Regulatory Relations  
c/o Megan Lawson  
300 Lakeside Drive  
Oakland, CA 94612

**SUBJECT: Pacific Gas and Electric Company's Advice Letter, Pursuant to D. 23-05-009, Ordering Paragraph 3**

Dear Sidney Bob Dietz II:

On May 19, 2023, the Commission issued D.23-05-009, closed Investigation (I.) 15-08-019, and adopted Safety Policy Division's (SPD) Modified Staff Report. The Modified Staff Report provides a plan for tracking (13) recommendations from the 2017 NorthStar Report on PG&E's safety culture and the 2019 First Update of the NorthStar Report. SPD selected recommendations for further monitoring that met one or more of the following criteria: 1) the recommendation would have a tangible impact on safety outcomes, as advised by NorthStar or as determined by SPD review; 2) the recommendation was marked as incomplete or not implemented within NorthStar's 2021 Final Update Report; and 3) the recommendation was not being monitored or tracked through other Commission oversight efforts.

D. 23-05-009 states<sup>1</sup> that in its review and disposition of the Advice Letter, SPD will determine if any recommendations can be closed out and marked complete based on PG&E's responses to the initial data requests. Following the review of Advice 4806-G/7036-E submitted by PG&E on October 2, 2023, SPD determined that the following recommendations can be closed out and marked as complete:

- U-6
- X-8 and X-9
- XI-4

Per D. 23-05-009, PG&E will continue to respond to the questions corresponding to each recommendation not marked complete by the Director of SPD for any follow-up data requests or questions through a semi-annual Advice Letter to the SPD. Even though PGE's subsequent semi-annual Advice Letter is not due until March 29, 2024, SPD recommends that PG&E respond to the attached data request for the recommendations marked as incomplete by January 12, 2024. This will allow SPD to address the outstanding recommendations promptly.

The following recommendations are still marked as incomplete:

- IV-1 and IV-5

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<sup>1</sup> See D.23-05-009, Section 4. Next Steps: No. 2, pg. 32

- VII-7
- XI-1

Sincerely,

A handwritten signature in black ink, appearing to read "Danjel Bout", with a long horizontal flourish extending to the right.

Danjel Bout  
Director for Safety Policy Division



October 2, 2023

**Advice 4806-G/7036-E**

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

**Subject: Pacific Gas and Electric Company's Advice Letter, Pursuant to D. 23-05-009, Ordering Paragraph 4**

**Purpose**

Pacific Gas and Electric Company (PG&E) hereby submits this Tier 1 Advice Letter ("AL") in compliance with California Public Utilities Commission ("CPUC") Decision ("D.") 23-05-009, Ordering Paragraph (OP) 4. This OP requires that, after the disposition of the first Advice Letter to the Safety Policy Division (SPD), PG&E must continue to respond to the questions corresponding to each recommendation that is not marked complete by the Director of Safety Policy Division or any follow-up data requests or questions through a semi-annual Advice Letter to the SPD, filed by the last business day of March and September unless otherwise directed by the Commission.

**Background**

On May 19, 2023, the CPUC issued D.23-05-009, closing Investigation (I.) 15-08-019 and adopting SPD's Modified Staff Report, dated April 2023. The Modified Staff Report provides a plan for tracking 13 recommendations from the 2017 NorthStar Report on PG&E's safety culture and 2019 First Update of the NorthStar Report. SPD selected recommendations for further monitoring that met one or more of the following criteria: 1) the recommendation could have a tangible impact on safety outcomes, as advised by NorthStar or as determined by SPD review; 2) the recommendation was marked as incomplete or not implemented within NorthStar's 2021 Final Update Report; and 3) the recommendation was not being monitored or tracked through other Commission oversight efforts.

On July 18, 2023, PG&E filed its first Advice Letter, Advice 4777-G/6993-E, to comply with OP 3 of D. 23-05-009, which requires that:

*No later than 60 days after the issuance of this decision, Pacific Gas and Electric Company must file an Advice Letter to the Safety Policy Division that includes responses to the data requests corresponding to the recommendations included in the Safety Policy Division Modified Staff Report, dated April 2023, attached to decision as Attachment A.*

Following disposition of the first AL, D.23-05-009, OP 4 requires that:

*After the disposition of the first Advice Letter to the Safety Policy Division (SPD), PG&E must continue to respond to the questions corresponding to each recommendation that is not marked complete by the Director of Safety Policy Division or any follow-up data requests or questions through a semi-annual Advice Letter to the SPD, filed by the last business day of March and September unless otherwise directed by the Commission.*

Following its review of Advice 4777-G/6993-E, SPD issued a disposition letter closing five recommendations and leaving eight recommendations marked incomplete. On August 31, 2023, the SPD issued a data request for the incomplete recommendations, to be answered by PG&E in a subsequent AL.

### **Discussion**

Included as Attachment A to this AL are responses to SPD's August 31, 2023, data request.

### **Protests**

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than **October 23, 2023**, which is 21 days after the date of this submittal<sup>1</sup>. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

Sidney Bob Dietz II  
Director, Regulatory Relations  
c/o Megan Lawson  
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name and e-mail address of the protestant; and

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<sup>1</sup> Pursuant to Rule 1.5 of General Order 96-B, PG&E requests to extend the protest period by one additional day because twenty days following submission of this advice letter is Sunday, October 22, 2023.

statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

### **Effective Date**

PG&E requests that this **Tier 1** advice submittal become effective upon date of submittal, which is **October 2, 2023**.

### **Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service lists for I.15-08-019 and R.21-10-001. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

          /S/          

Sidney Bob Dietz II  
Director, Regulatory Relations  
CPUC Communications

cc: Service List I.15-08-019 and R.21-10-001



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (U 39 M)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Stuart Rubio

Phone #: 279-789-6210

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: stuart.rubio@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
 PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4806-G/7036-E

Tier Designation: 1

Subject of AL: Pacific Gas and Electric Company's Advice Letter, Pursuant to D. 23-05-009, Ordering Paragraph 4

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.23-05-009

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested?  Yes  No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes  No

Requested effective date: 10/2/23

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

<sup>1</sup>Discuss in AL if more space is needed.

**Protests and correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

California Public Utilities Commission  
Energy Division Tariff Unit Email:  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson  
Title: Director, Regulatory Relations  
Utility/Entity Name: Pacific Gas and Electric Company  
  
Telephone (xxx) xxx-xxxx: (415)973-2093  
Facsimile (xxx) xxx-xxxx:  
Email: PGETariffs@pge.com

Contact Name:  
Title:  
Utility/Entity Name:  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

CPUC  
Energy Division Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

Clear Form

**ATTACHMENT A**  
**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)**  
**RESPONSES TO SAFETY POLICY DIVISION'S DATA REQUESTS FOR**  
**ON-GOING MONITORING**  
**IN COMPLIANCE WITH CPUC DECISION 23-05-009**  
**SUBMITTED ON OCTOBER 2, 2023**

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Advice Letter 4777-G/6993-E**  
**Data Response**

PG&E Data Request No.:	ED_002		
PG&E File Name:	PGE_AdviceLetter_4777-G/6993-E_DR_ED_002		
Request Date:	August 31, 2023	Requester DR No.:	002
Date Sent:	October 2, 2023	Requesting Party:	CPUC - Safety and Policy Division
PG&E Witness:		Requester:	Oge Enyinwa

**QUESTION 1**

NorthStar Recommendation U-6

- a) Provide detailed information on what organizational changes were made for the two scenarios when PG&E had only the CSRO position and when it split the role into the CSO and CRO roles.
- b) Provide an organizational chart showcasing the previous and current versions of the role changes.
- c) Why did PG&E think it necessary to split the CSRO position again?
- d) What are PG&E's future plans for the CRO and CSO positions? Does PG&E plan to keep both separate or consolidated?
- e) Does PG&E intend to keep both positions separate going forward?
- f) What is PG&E doing to mitigate the risks that result from frequent organizational changes and reporting structures?

**RESPONSE TO QUESTION 1**

- a) The key organizational changes when splitting the joint Chief Safety and Risk Officer (CSRO) position into separate Chief Safety Officer (CSO) and Chief Risk Officer (CRO) positions were twofold:
  - 1. Moving the CSO position and the Safety organization to Operations so that the CSO, Dr. Matt Hayes, reports directly to the Chief Operating Officer (COO), Sumeet Singh. Mr. Singh formerly held the joint CSRO position before being elevated to COO. Structuring the organization in this manner allows the Safety organization to be closer to the work being performed and promotes both efficiencies and accountability. It also allows us to embed safety culture and ownership with the teams performing—and who are closest to—the work. Additionally, the Training organization was also moved under Safety, as safety and training go hand-in-hand and benefit from this connection. Before being appointed CSO, Dr. Hayes was formerly Vice President, Enterprise Health & Safety. Dr. Hayes is an excellent fit for the position of CSO, as he has over 20 years of professional experience and brings substantial expertise

in both safety and training, with a nuclear power background. His experience includes over seven years at PG&E, over four years at Southern California Edison, and over six years in the United States Navy.

2. Joining the CRO position and the Risk organization with the Ethics and Compliance organization so that the CRO, Alex Vallejo, reports directly to the General Counsel and Chief Ethics & Compliance Officer, John Simon. This change creates organizational autonomy between Risk and Operations, allowing Risk to exercise appropriate independence and functional separation to effectively manage enterprise risk holistically and cross-functionally across the enterprise. Additionally, connecting risk, compliance, and ethics brings organizational synergies due to the interconnected nature of each of these areas. Before being appointed CRO, Mr. Vallejo held the position of Vice President, Compliance & Ethics and Deputy General Counsel. Mr. Vallejo's professional experience makes him particularly well-suited for the position of CRO, as he has developed significant expertise in risk, compliance, and ethics in his 13 years at PG&E. Mr. Vallejo joined PG&E shortly after the San Bruno explosion and supported Gas Operations' turnaround and multi-year risk reduction efforts. He also led the risk and compliance functions in Customer Care and oversaw all aspects of the company's court-appointed federal monitorship, the scope of which centered on overseeing PG&E's operational effectiveness and risk-informed decision making processes.
- b) Please see attachment "*PGE Org\_20230228\_CSRO structure.pdf*" for an organizational chart depicting the organization during the period when the CSO and CRO positions were combined. Please see attachment "*PGE Org\_20230831\_CSRO\_CRO structure.pdf*" for a current organizational chart, which depicts the organization with the CSO and CRO positions separated.
  - c) PG&E determined it was necessary to split the CSRO positions because the individual who held the joint CSRO position, Sumeet Singh, was elevated to COO. Mr. Singh's background and experience made him uniquely suited to holding this joint position. Once Mr. Singh was elevated to COO, it was determined that the best path forward was to separate the positions again. This separation plays to the strengths and experiences of Dr. Hayes and Mr. Vallejo and allows for synergies based on this new organizational structure, as described in subpart (a) above.
  - d) PG&E's future plans for the CRO and CSO positions are to keep these two positions separate. This will play to the strengths of PG&E's Chief Risk Officer and Chief Safety Officer and allow these functions to continue to evolve and improve.
  - e) Yes, PG&E intends to keep both positions separate going forward. However, PG&E will continue to be nimble and execute organizational changes in the future, if needed.
  - f) To mitigate the risks resulting from frequent organizational changes and reporting structures, PG&E is being thoughtful and purposeful about all structural change within the organization. While there is a danger in over-frequent organizational change, there is also a danger in failing to adapt to changing operational needs and circumstances. Therefore, PG&E is focused on striking the correct balance between stability and evolution. PG&E continues to focus on its strengths while also planning

for the future and the changing risk and safety issues that the company will face. PG&E and the entire utility industry are undergoing rapid change, and PG&E will address these changes holistically as a company, in a coordinated and unified manner.

## **QUESTION 2**

### NorthStar Recommendations IV-1 and IV-5

Provide training curriculums for the CRO and CSO positions. Where applicable, include the training frequency and renewal requirements.

## **RESPONSE TO QUESTION 2**

Please see attachment “Profile Training CSO and CSO.pdf” for the current training profiles of PG&E’s CRO, Alex Vallejo, and CSO, Matt Hayes. Additionally, please see attachment “Additional Training CSO\_redacted.pdf” which includes additional safety training Dr. Hayes received through PG&E’s Diablo Canyon Power Plant training program.

Note, confidential employee information has been redacted from the attachments provided with this response.

## **QUESTION 3**

### NorthStar Recommendation VII-7

- a) Provide detailed explanations showing how the maturity scores for Plays 2 and 3 of 77% and 42% were calculated. Include a copy of the metrics.
- b) Provide a detailed explanation for the maturity score of 42% for Play 3, Problem-Solving, compared with 77% for Play 2, Operating Reviews.
- c) PG&E’s response to Data Request No 1, VII-7 (b) states,<sup>1</sup> “Over 30 PPS are completed or currently active.” What is the timeline for these completed 30 PPS?

## **RESPONSE TO QUESTION 3**

- a) The maturity scores were based on the enterprise-wide Lean Adoption Maturity Self-Assessment that was administered April and May of 2023. The Lean Adoption Maturity Self-Assessment was created based on our Lean Maturity Model for Plays 1 through 5. A series of self-assessment questions were created to assess an individual leader’s lean maturity. The self-assessment was targeted at co-workers who were in a leadership position (Supervisor level and beyond), totaling around 4,300 employees, and ending up with a participation rate of 99.6%. The intent of this assessment was to identify areas where progress was made and where additional

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<sup>1</sup> See PG&E’s AL 4777-G/6993-E, Attachment A: Response to Data Request VII-7, pg. 7.

progress was needed. This type of assessment is considered to be a best practice when implementing a significant organizational change, such as the implementation of a new operating system, in a large, distributed organization such as PG&E.

For Play 2, there are a total of 11 questions that were used to calculate the 77% adoption rate. For Play 3, there are a total of 2 questions that were used to calculate the 42% adoption rate. The specific questions and scoring methodology used to calculate the adoption percentages for Play 2 and Play 3 are provided below.

#### Questions for Play 2:

1. Are all required attendees / delegates present?
2. Do your Operating Reviews start on time?
3. Do your Operating Reviews have a structured flow by following an agenda?
4. Do you lead your Operating Reviews and use exception-based reporting?
5. Do you refrain your team from detailed problem solving during Operating Reviews?
6. Are you engaged during Operating Review discussions?
7. Is your team engaged during Operating Review discussions?
8. Do you provide feedback to the team for escalations / updates?
9. Do you review the Action Sheet with your team?
10. Do you ask open ended questions?
11. Do your Operating Reviews end on time?

The available response for all the questions above are the following selections:

- No / Never = 0 points
- Somewhat / Sometime = 1 point
- Yes / Always = 2 points

#### Questions for Play 3:

1. Are you able to lead a Problem-Solving session?

The available response for this question are the following selections:

- No, I defer to the Lean Coaches to lead = 0 points
- Yes, but with Lean Coach assistance = 1 point
- Yes, I can lead without any coaching assistance = 2 points

2. Do you follow-up on completed problems and ensure that the implementation & analysis was effective?

The available response for this question are the following selections:

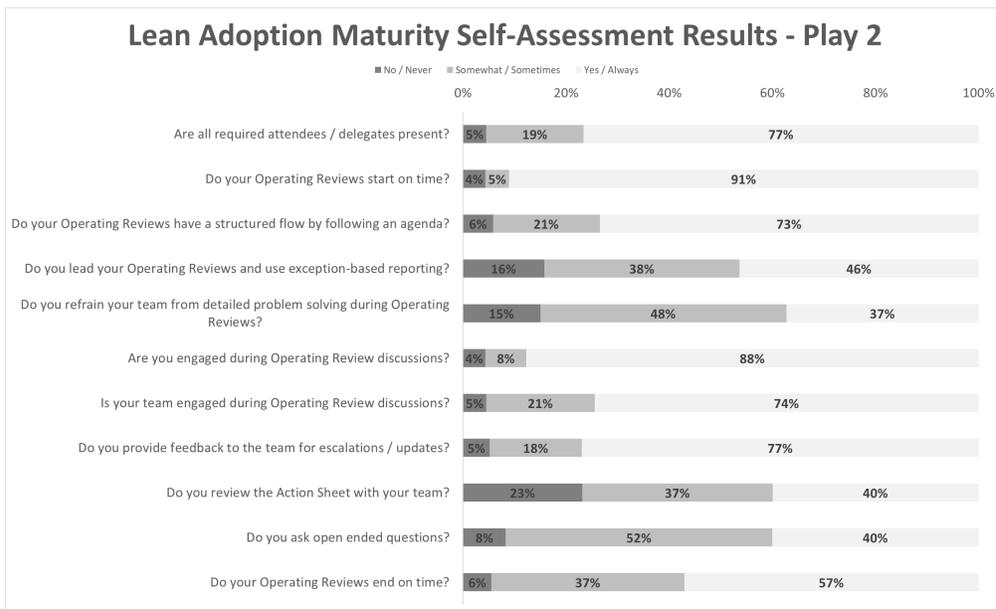
- No / Never = 0 points
- Somewhat / Sometime = 1 point
- Yes / Always = 2 points

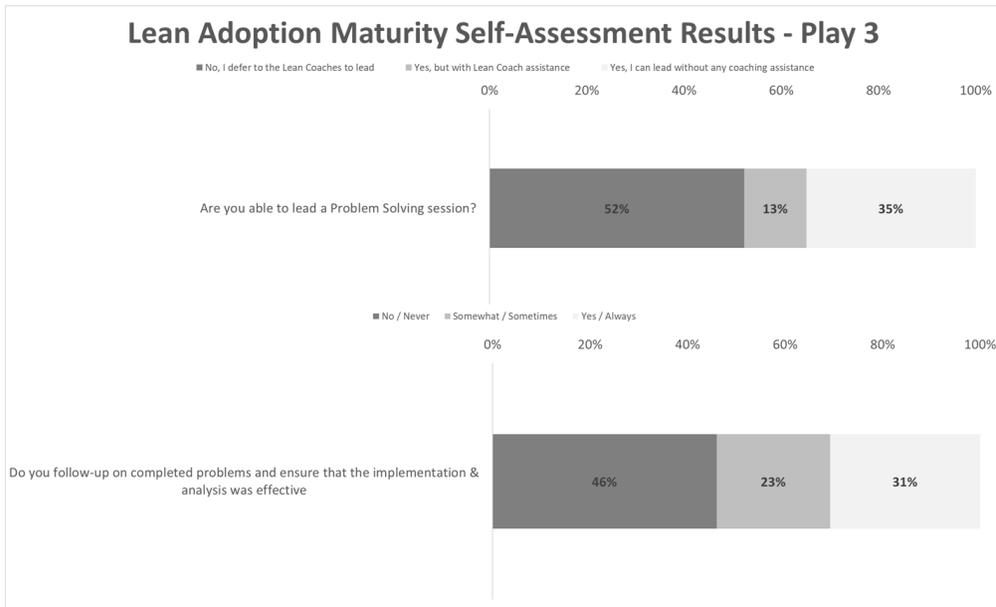
**The Maturity Percentage = The Sum of Total Participant Points / The Sum of Total Possible Participant Points**

Play 2 = 73,264 Points based on Co-Workers Selection / 94,578 Total Possible Points Based on Co-Workers Participation = 77%

Play 3 = 7,189 Points based on Co-Workers Selection / 17,196 Total Possible Points Based on Co-Workers Participation = 42%

- b) As stated in the previous response, maturity scores for Play 2 and Play 3 were determined by our co-workers' self-assessment responses. For Play 2, the majority of the respondents are confident complying with our Operating Review guidelines and the self-assessment rating reflects that. For Play 3, more than half of the respondents feel they need additional support for problem solving, which either requires someone outside of their team to lead them or assist them in problem solving. The specific scores for each of the questions in self-assessment survey for Play 2 and Play 3 are provided below, and provide greater detail behind the adoption percentages.





- c) We have 13 completed Practical Problem Solving (PPS). Depending on the complexity of the PPS, the timeline can range from three to 11 months to complete, with an average completion time of seven months. The remaining PPS are still active.

**QUESTION 4**

NorthStar Recommendations X-8 and X-9

- a) PG&E’s response to Data Request No. 1, X-8 & X-9 states:<sup>2</sup>

“A summary of causes and corrective actions is shared with the broad organization via a daily communication that goes out to the entire organization daily. This is a requirement that is tracked and audited to ensure that it happens. This requirement has been in place for many years and remains in place today.”

NorthStar’s Recommendations X-8 & X-9 state,<sup>3</sup> “Provide a summary to all employees for the cause and corrective actions taken/to be taken once an incident investigation is complete (Apparent Cause Evaluation [ACE]/RCE). All PG&E employees are notified via email within 24 hours of the incident providing a brief summary of the incident. There is no such requirement for closure. NorthStar’s review of safety-related communications to all employees evidenced the initial notification and the lack of any commensurate notification upon completion of the investigation.”

Provide detailed descriptions of the procedure PG&E had before NorthStar’s

<sup>2</sup> See PG&E’s AL 4777-G/6993-E, Attachment A: Response to Data Request X-8 & X-9, pg. 10.  
<sup>3</sup> See PG&E’s AL 4777-G/6993-E, Attachment A: NorthStar Recommendations X-8 & X-9, pg. 9.

recommendations and what is currently in place.

b) PG&E's response to Data Requests X-8 & X-9 states:<sup>4</sup>

"We have also reinstated Cause Evaluator refresher training for Cause Evaluators, Leads, and Sponsors."

What cadence has PG&E re-instituted for taking the Cause Evaluator refresher training for the Cause Evaluators, Leads, and Sponsors roles?

#### RESPONSE TO QUESTION 4

a) The original guidance for communication related to causes and corrective actions resulting from incident investigations was contained in line of business specific procedures that were identical. As an example, see Appendix B, Root Cause Evaluation Communication Schedule, GOV-6102P-05, Power Generation Cause Evaluation, Revision 0, effective June 22, 2016. A copy of GOV-6102P-05 is attached to this response for reference as "GOV-6102P-05\_Rev 0\_Redacted.pdf."

The scope of communication was specific to only serious injuries and fatalities and distribution was limited to the line of business where the event took place and through a verbal presentation.

Instructions included providing a summary of the report and presenting it to the line of business leadership for verification of the Cause Evaluation team's findings, corrective actions and lessons learned.

At minimum, the summary would contain the following information:

- Brief Description of Incident
- Causal Analysis
- Corrective Actions
- Lessons Learned
- Effectiveness Review Plan.

The current requirement to communicate the results of serious incident or fatality evaluation or investigation is captured in Utility Standard: SAFE-1004S, Revision Safety Incident Notification & Response Management, Attachment 10 Rev 0, *Serious Incident Response, and Investigation Communication Protocol* (published March 8, 2022). A copy of SAFE-1004S, Attachment 10 is attached to this response for reference as "SAFE-1004S+Att.10\_SIF Rev 0.pdf."

SAFE-1004S states the following:

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<sup>4</sup> See PG&E's AL 4777-G/6993-E, Attachment A: Response to Data Request X-8 & X-9, pg. 10.

A closing summary that communicates the serious incident investigation team's findings, corrective actions, and lessons learned to PG&E employees.

At minimum, the communication is to be distributed via email to all PG&E Employees and contains the following information:

- Brief Description of Incident
  - Causal Evaluation
  - Corrective Actions
  - Lessons Learned.
- b) Per GOV-6102S Enterprise Cause Evaluation Standard, Revision 6 (published May 25, 2023) cause evaluators are required to take a refresher course every two years. A copy of GOV-6102S is attached to this response for reference as "GOV-6102S Rev 06\_Redacted.pdf."

Refresher for leaders and sponsors is based on cause evaluation programmatic changes. When change management analysis indicates the need to refresh/retrain team leads and sponsors, then refresher training will be conducted. This is a best practice based in the nuclear power industry that PG&E has adopted.

Note, employee names have been redacted from the attachments provided with this response.

## **QUESTION 5**

### NorthStar Recommendation XI-1

- a) Why has the number of assessors decreased from seven in 2018 to three in 2022?
- b) Why have yearly assessments decreased from 182 in 2018 to 10 in 2022?
- c) What happens when there is non-compliance with the requirements as specified in Utility Standard: SAFE-3001S Contractor Safety Standard despite further evaluations and interventions?

## **RESPONSE TO QUESTION 5**

- a) Four assessors left the organization and the positions were not backfilled until 2023. Today, more than sixty assessors perform these compliance assessments, including a fully committed director, a communications manager, a project manager, and six safety managers dedicated to contractor safety. This collaborative team identifies and assesses contractor safety risks and opportunities, creates contractor safety standards, procedures, and processes necessary to deliver results, and, in partnership with functional area and regional contractor safety teams, takes actions to continually improve PG&E's contractor safety performance to achieve intended outcomes.

- b) As stated above, PG&E's Enterprise Contractor Safety department did not have the organizational capacity to support the expected number of assessments and instead focused on Management and Organizational Assessments (MOAs). The MOA process is a contractor approval process for contractors that are new to PG&E, those that have been in business less than three years, or existing contractors that have been identified as increasing their headcount significantly, reflecting rapid company growth. This process ensures that PG&E's Contractor Safety has independently evaluated those contractors achieving a passing grade in ISNetwork (ISN) when a contractor has been identified as New in Business (NIB) or having Rapid Growth. The process includes assessing the contractor's management staff, organizational structure, proposed spans of control, relevant work experience, employee training plans, implementation plans, and reference checks. Additionally, for rapid growth companies, it evaluates the contractor's capacity to respond to the increased headcount by factoring in any additional safety measures to accommodate.
- c) If, after further evaluations and interventions, non-compliance with the requirements as specified in Utility Standard: SAFE-3001S Contractor Safety Standard continues, several actions may be taken, depending upon the issue(s). First, a submission will be entered into the enterprise-wide Corrective Action Program (ECAP). The purpose of ECAP is to identify, resolve, and track nonconformities and opportunities for improvement. The level of response to a problem, issue, concern, or opportunity for improvement depends on the level of associated risk, considering the impact on the risk factors of safety, the environment, compliance, reliability, reputation, and financial performance. PG&E's ECAP team evaluates every submission and involves a cross-functional team, including contractor leadership, should it be warranted, to review the issue and prevent a reoccurrence.

Depending upon the severity of the issue, PG&E may implement a Contractor Safety Quality Assurance Review (CSQAR), which is a detailed assessment of the Contractor's safety program implementation and field safety performance. The process includes a desktop review, safety culture survey, barrier analysis, and PG&E and contractor leadership engagement. PG&E may, at any time, choose to issue a contractor safety stand-down and/or probation order. The focus is always on the elimination of serious injuries and fatalities. Implementation of the CSQAR program has yielded outstanding results. Since its inception, PG&E has noted a reduction in SIF and Non-SIF incidents among companies that have completed the process. Written safety programs have improved, particularly driving safety programs. Onboarding has improved, as well as knowledge and skill assessments. Field safety oversight has improved, including subcontractor oversight, and PG&E's collaboration, communication, and partnership have been strengthened with contract partners. As of the time of filing, we completed CSQARs with our 19 top at-risk contract companies, based on SIF performance. Since completing the CSQARs, there has been a 77% reduction in SIF events among these 19 companies (from 39 events prior to CSQAR to 9 events post-CSQAR).

## QUESTION 6

NorthStar Recommendation XI-4

Provide a copy of the Enterprise Contractor Safety Standard, Revision 6.

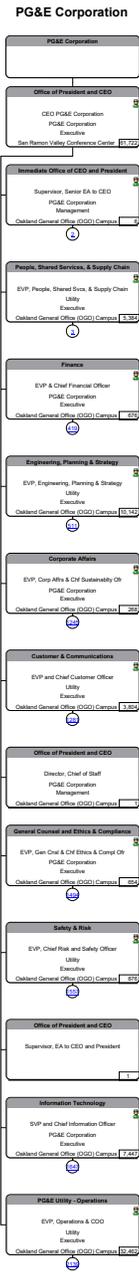
**RESPONSE TO QUESTION 6**

Please see attachment "SAFE-3001S Enterprise Contractor Safety Management Standard\_Rev6\_redacted.pdf" for a copy of the Enterprise Contractor Safety Standard, Revision 6.

Note, employee names have been redacted from the attachment provided with this response.

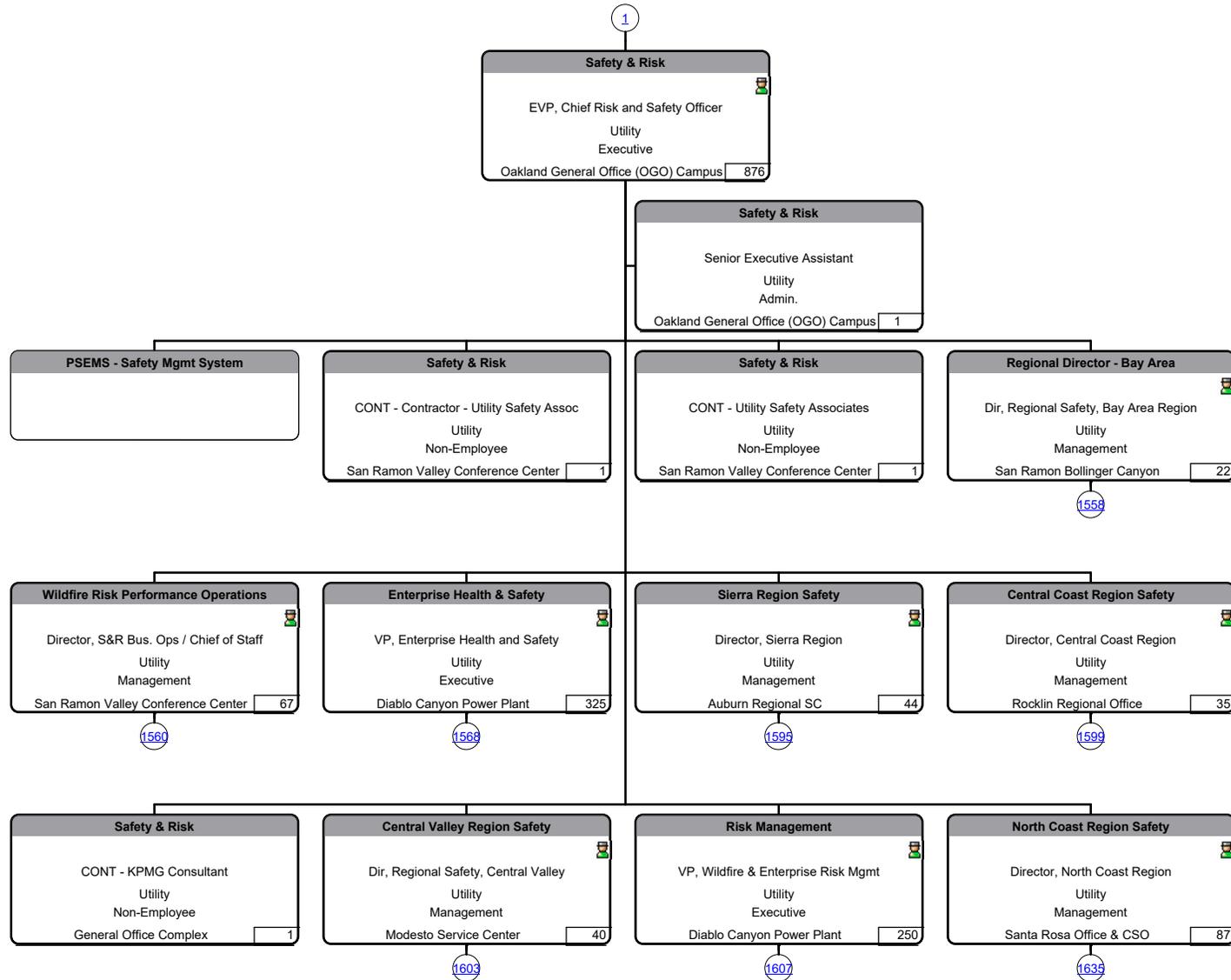
## **Attachment**

PGE Org\_20230228\_CSRO structure.pdf



# Safety & Risk

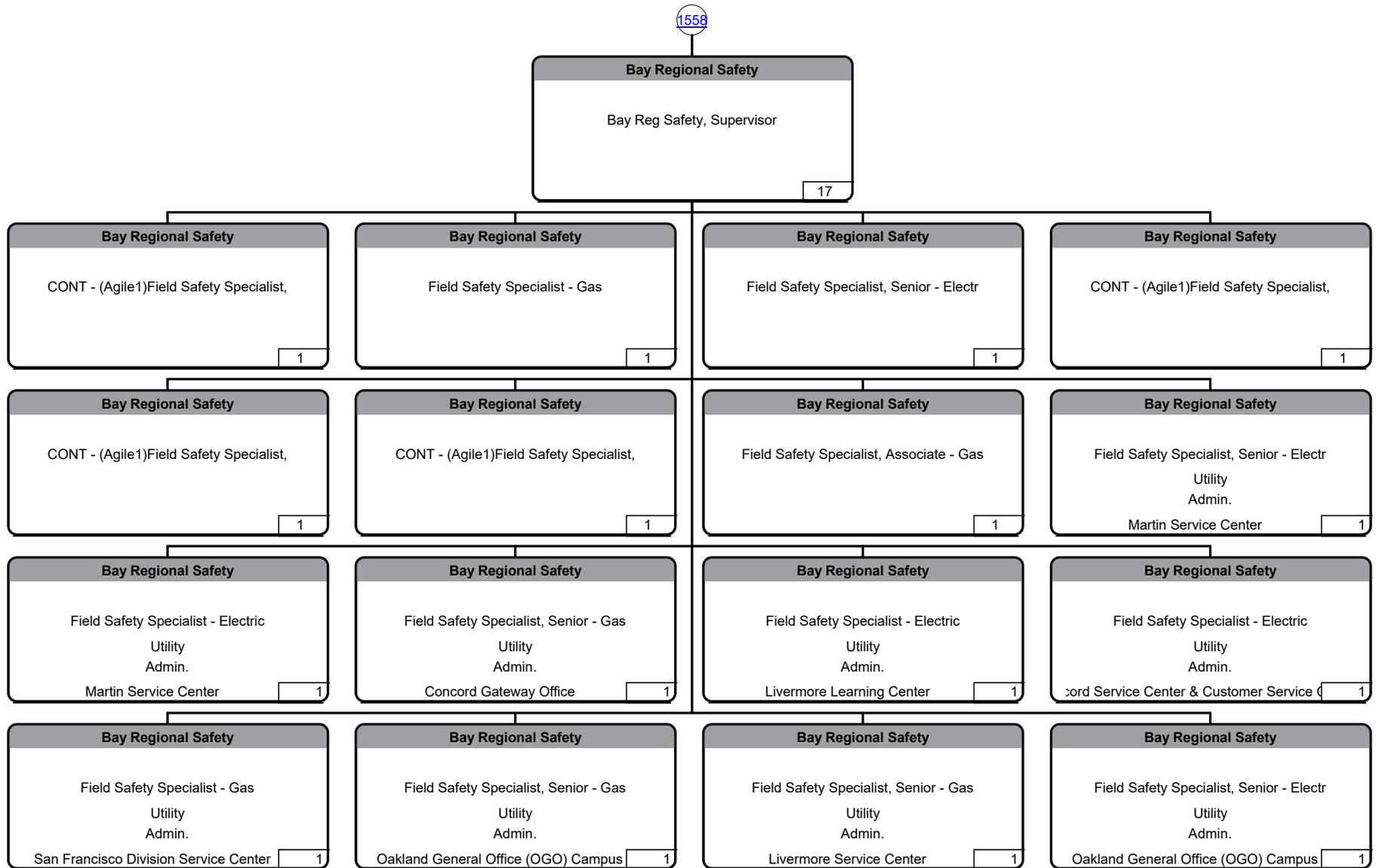
## Safety & Risk



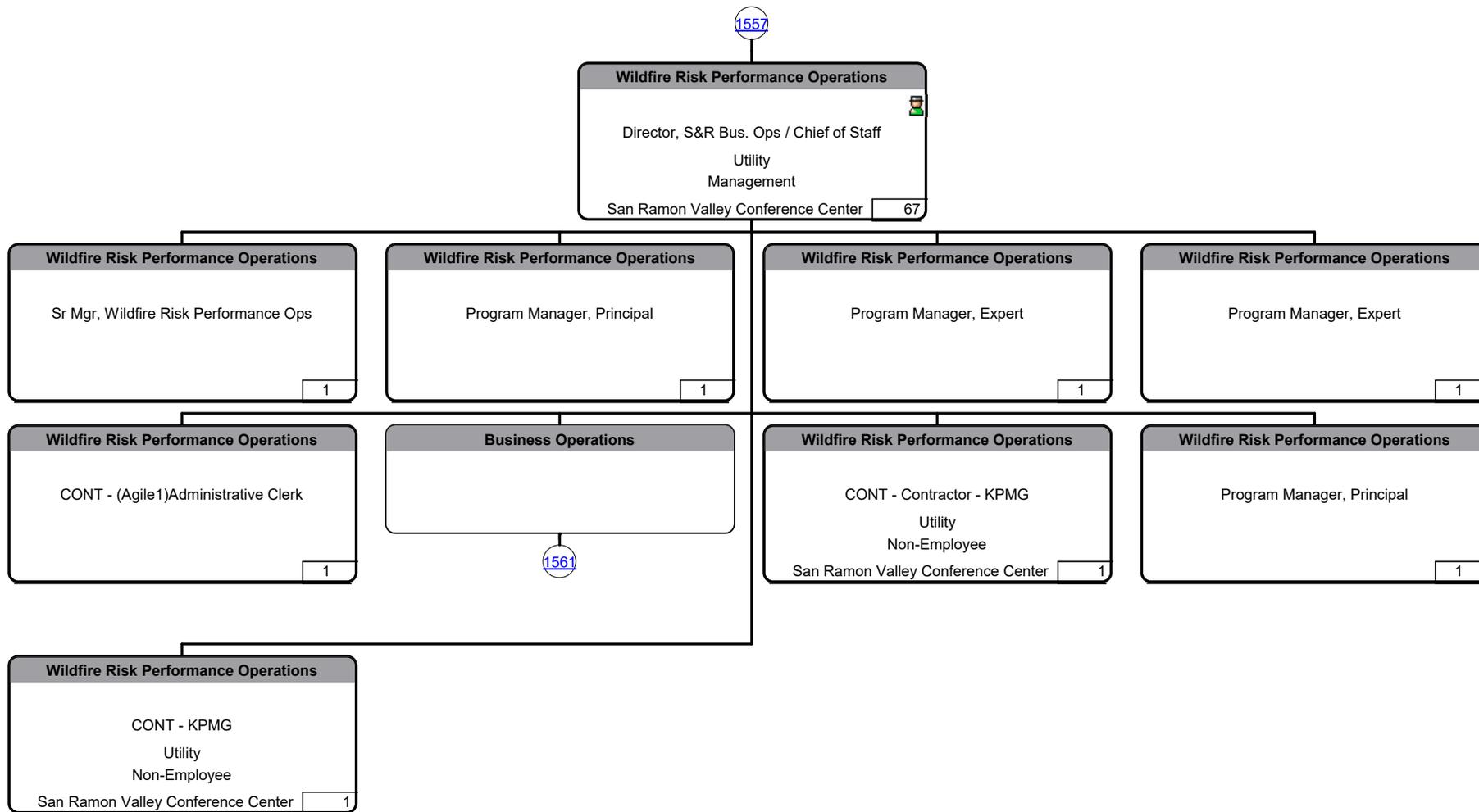


# Bay Regional Safety

1559

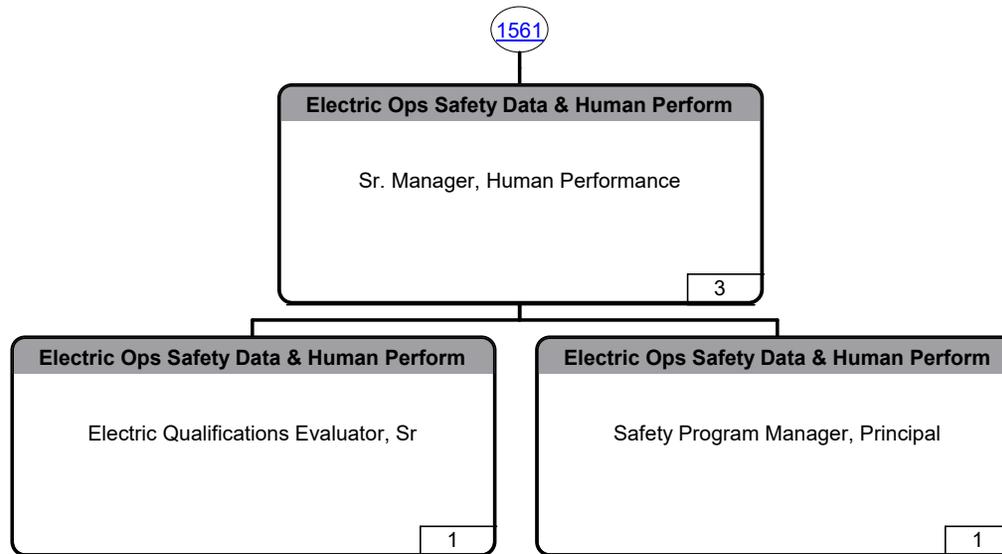


### Wildfire Risk Performance Operations

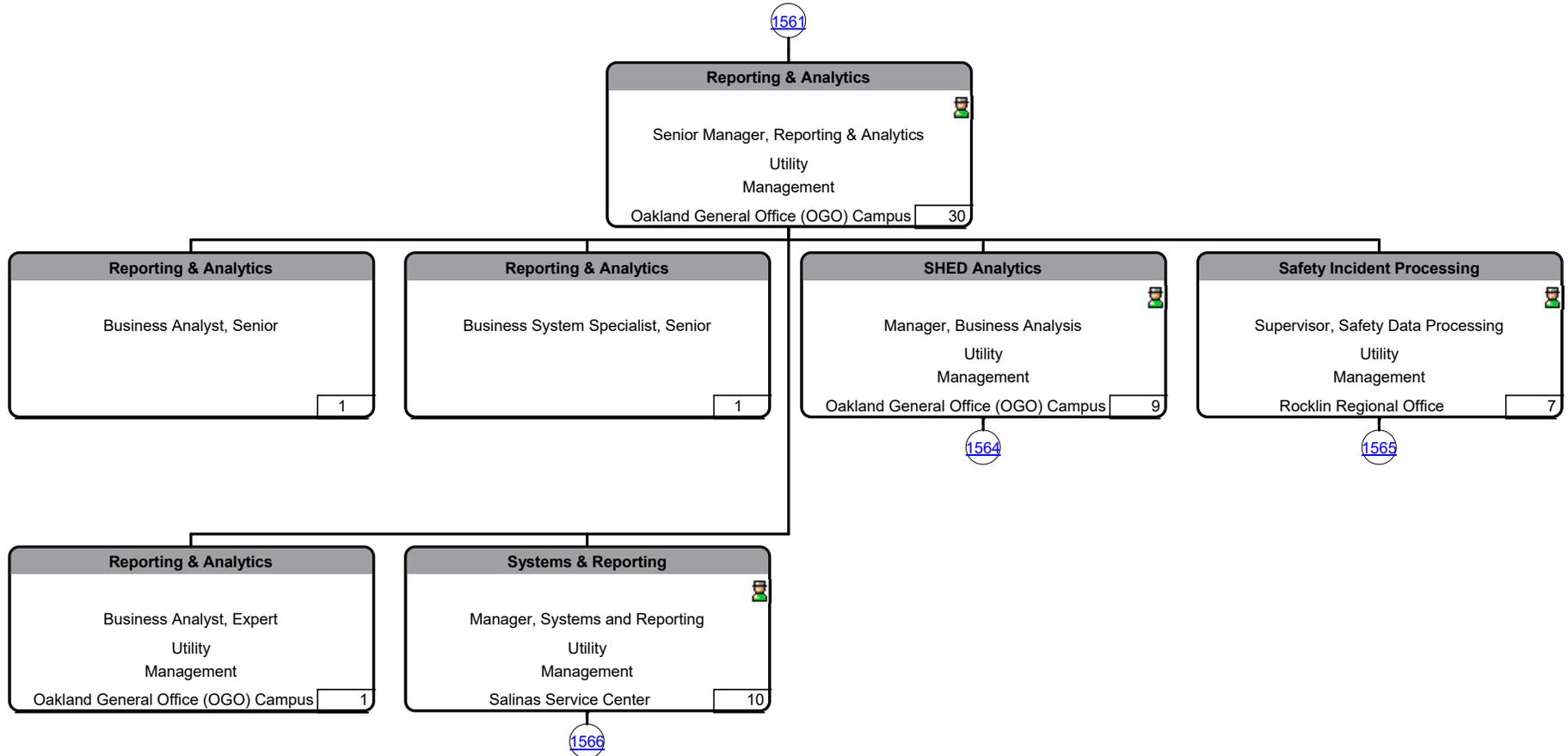




## Electric Ops Safety Data & Human Perform

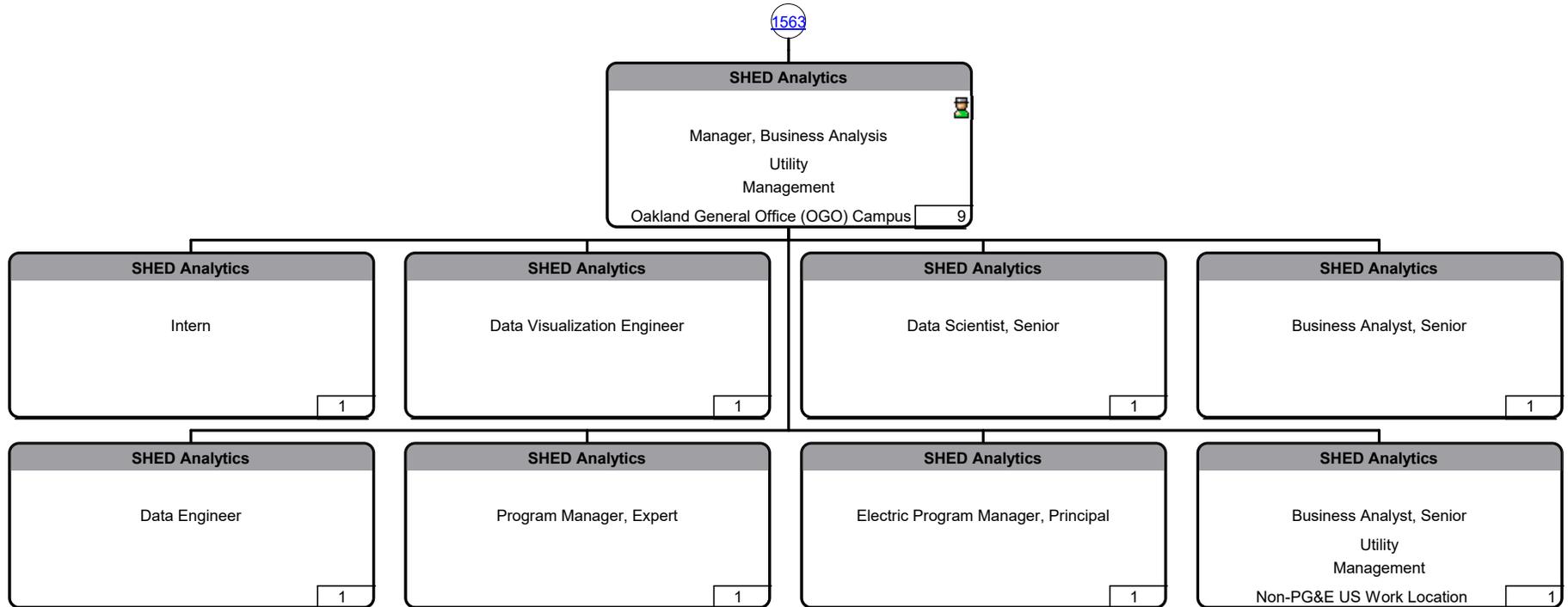


# Reporting & Analytics

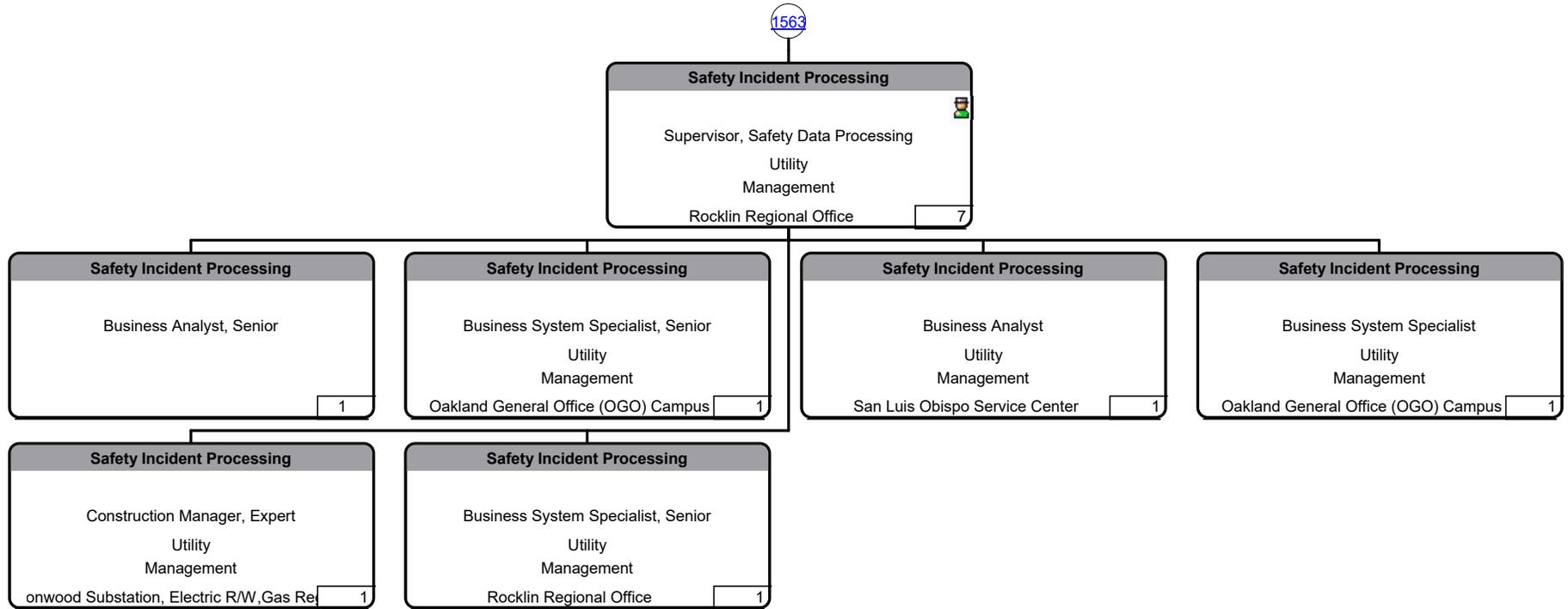


# SHED Analytics

1563

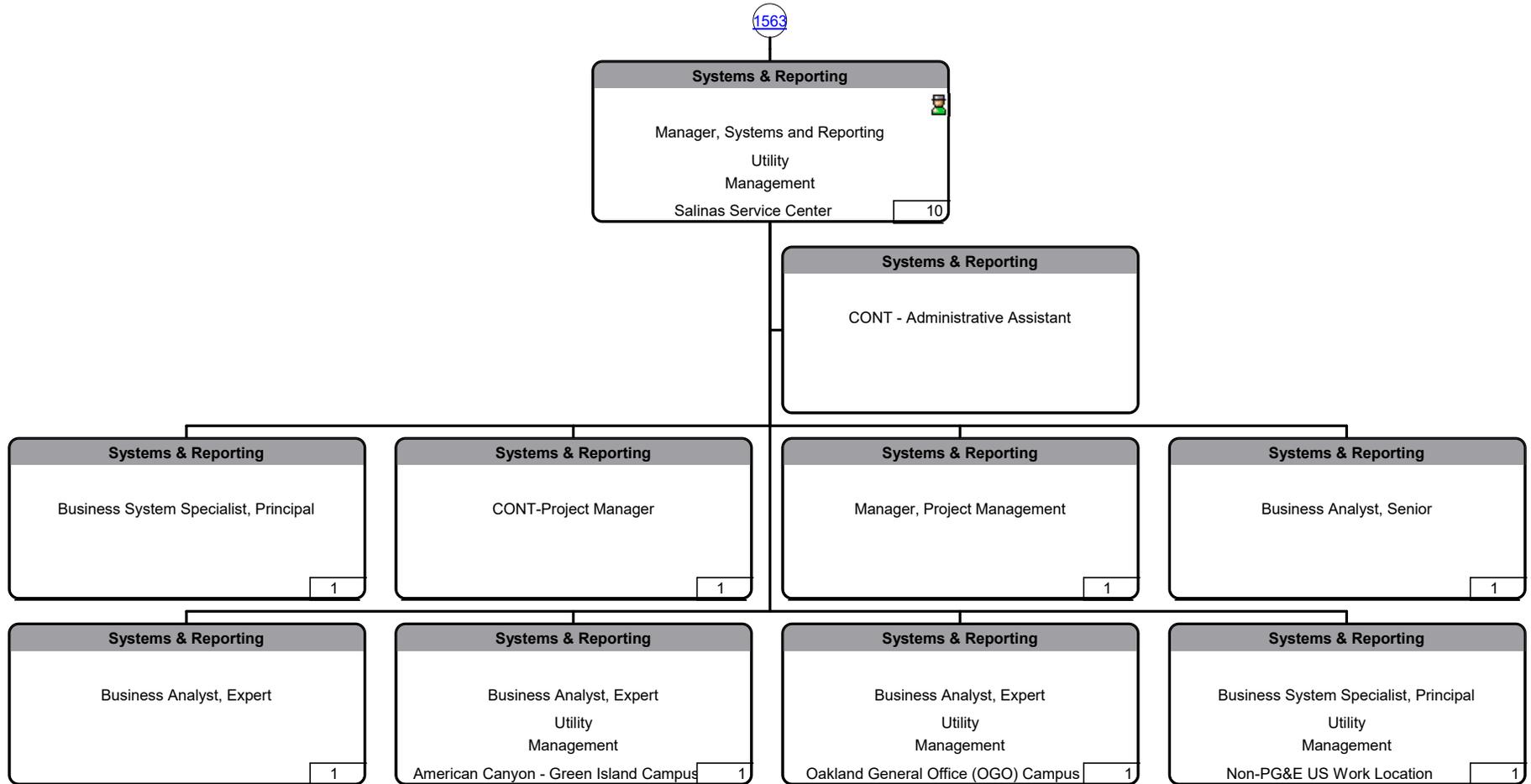


### Safety Incident Processing

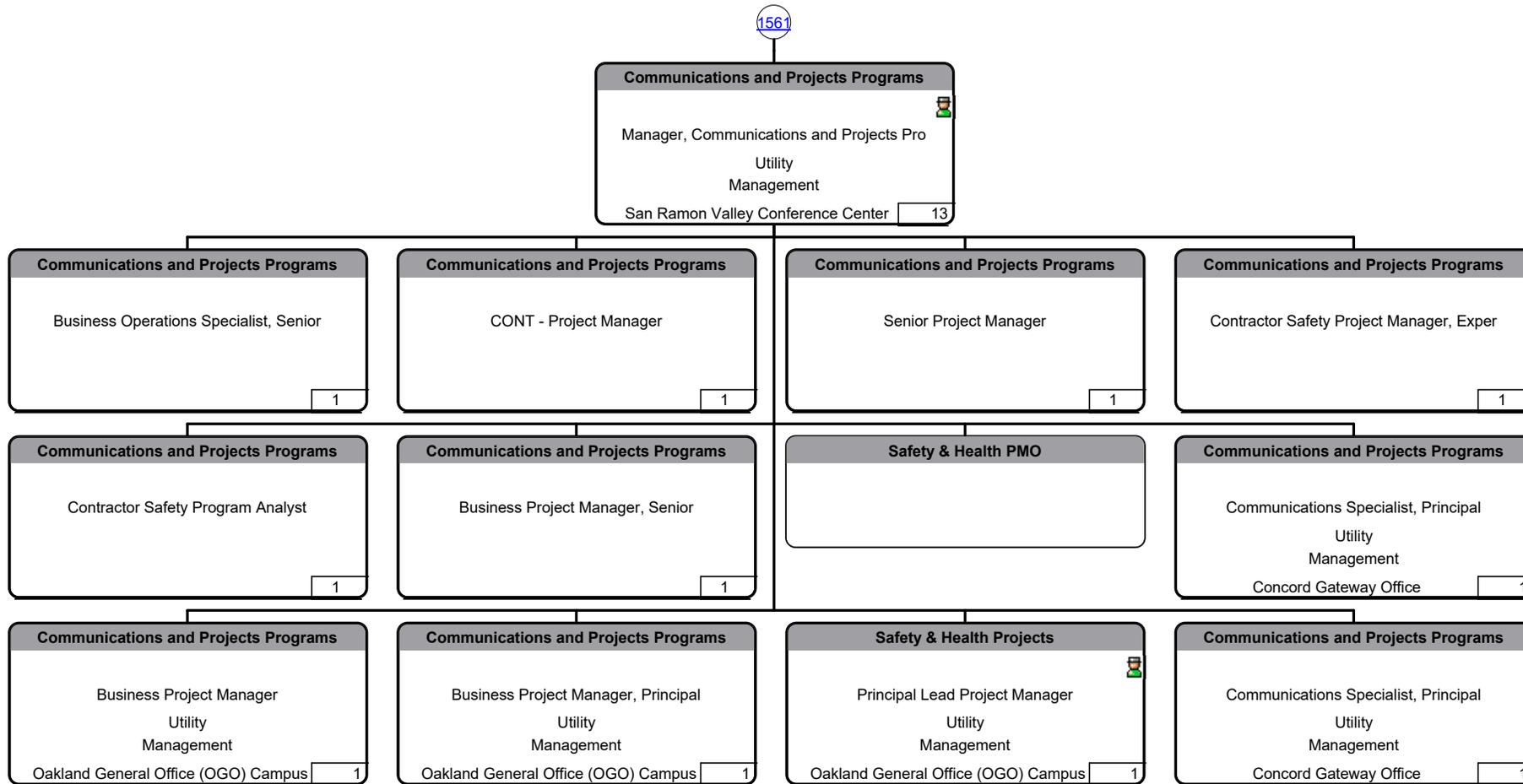


# Systems & Reporting

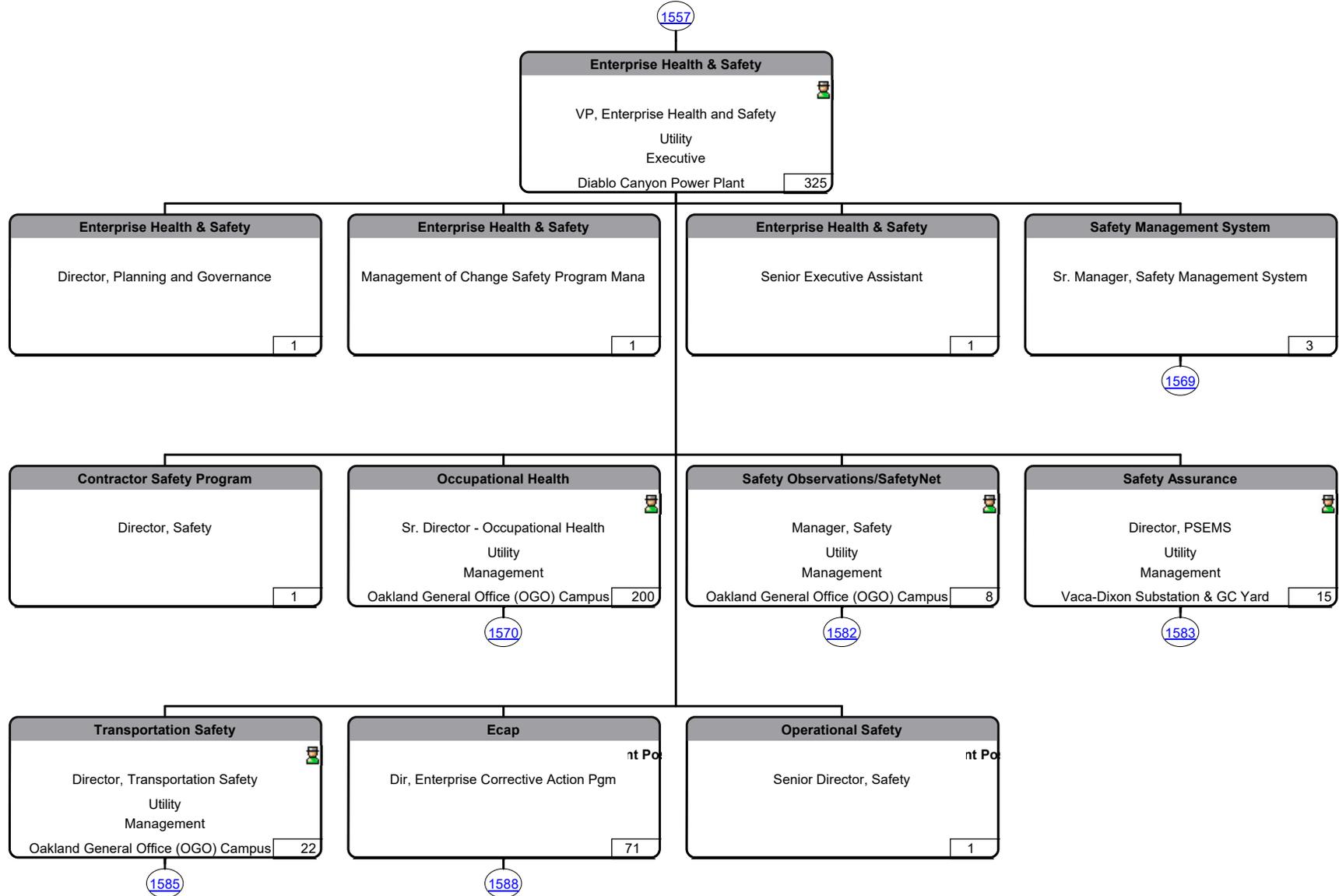
1563



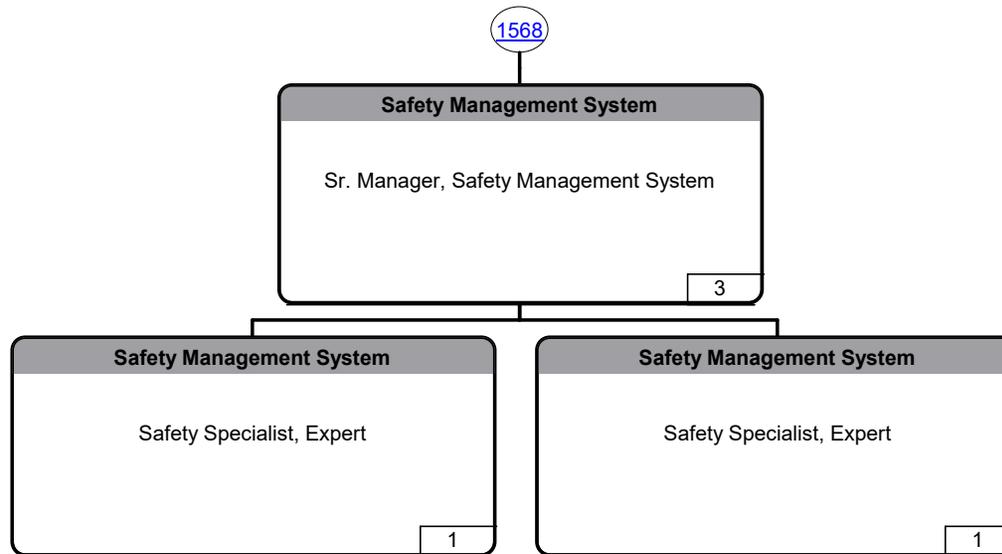
# Communications and Projects Programs



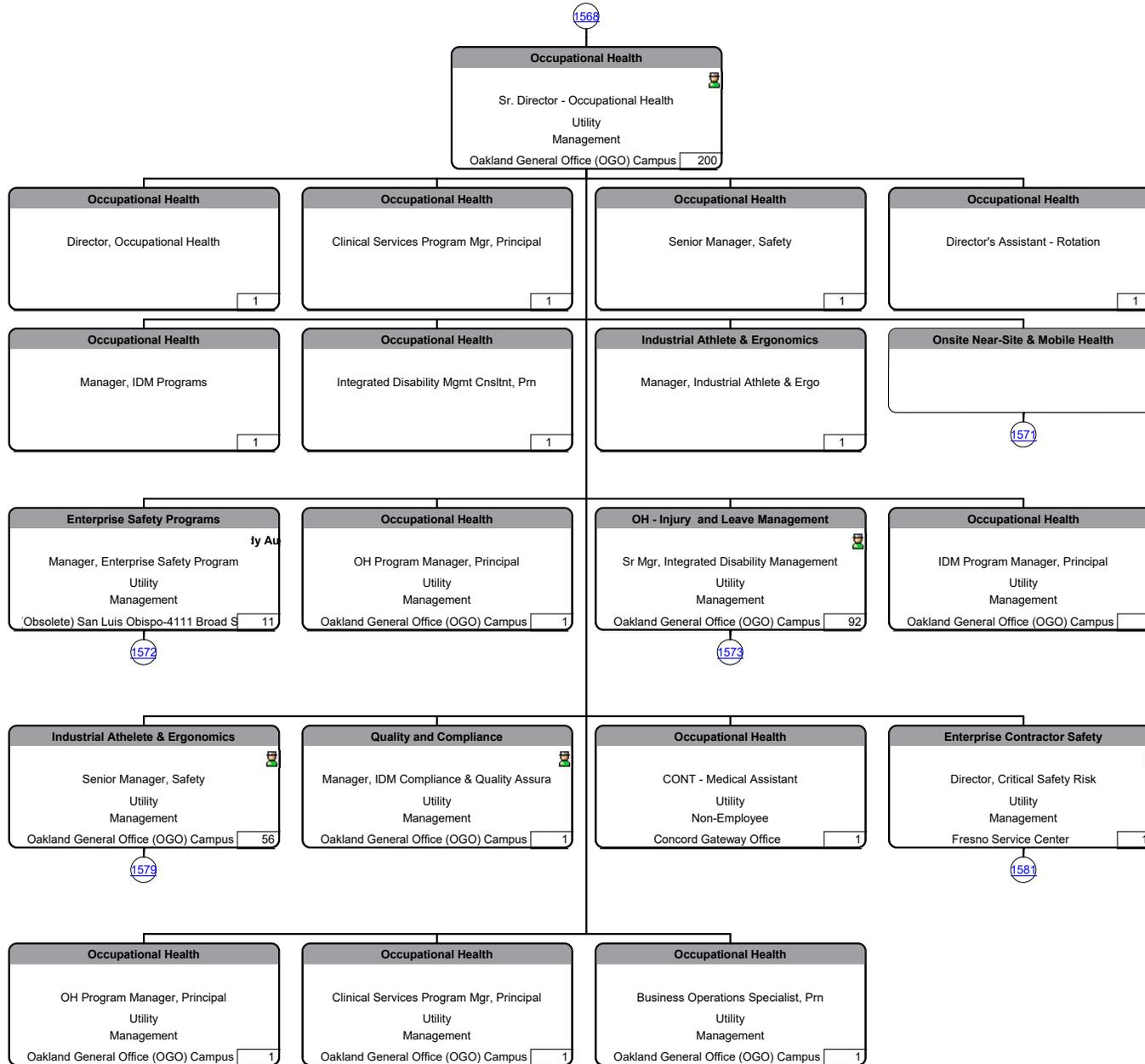
# Enterprise Health & Safety



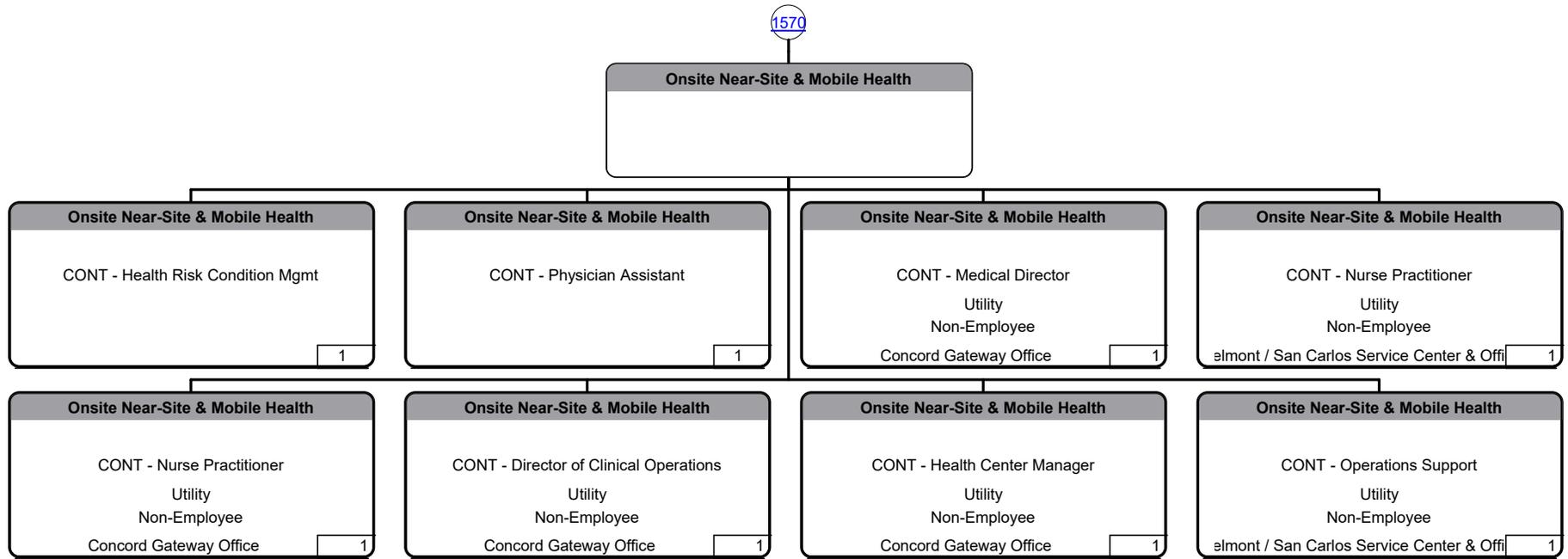
# Safety Management System



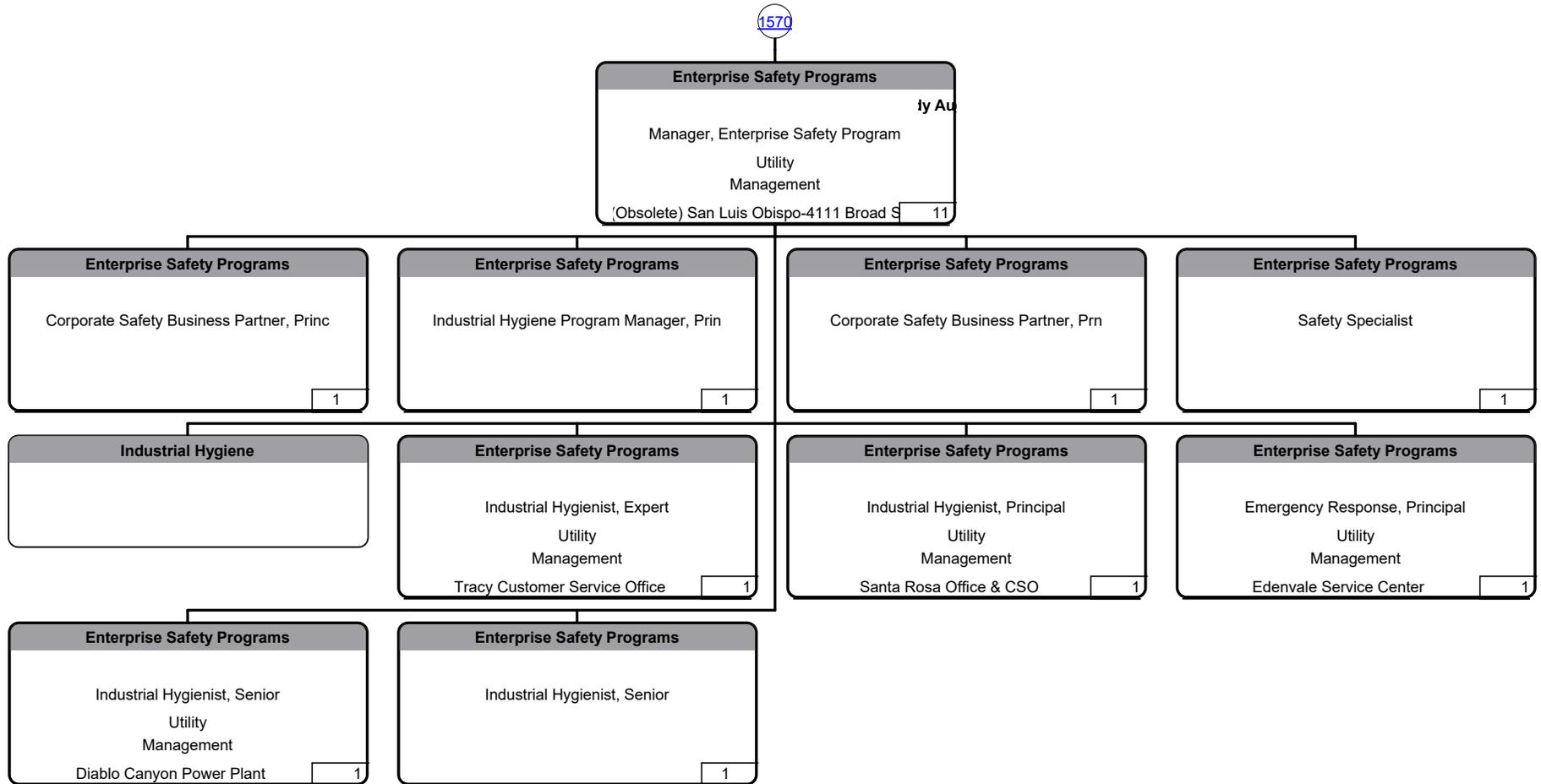
# Occupational Health



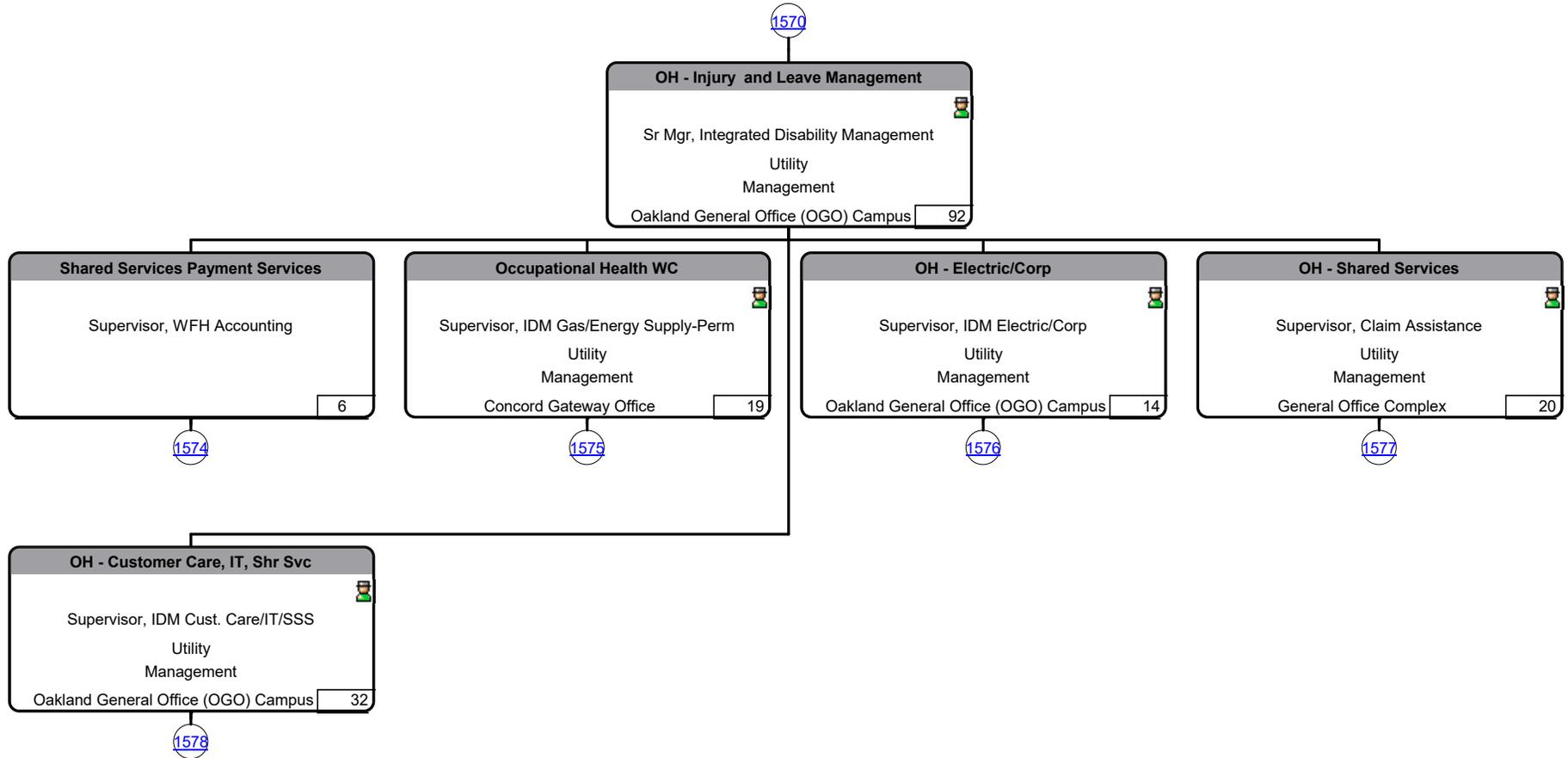
## Onsite Near-Site & Mobile Health



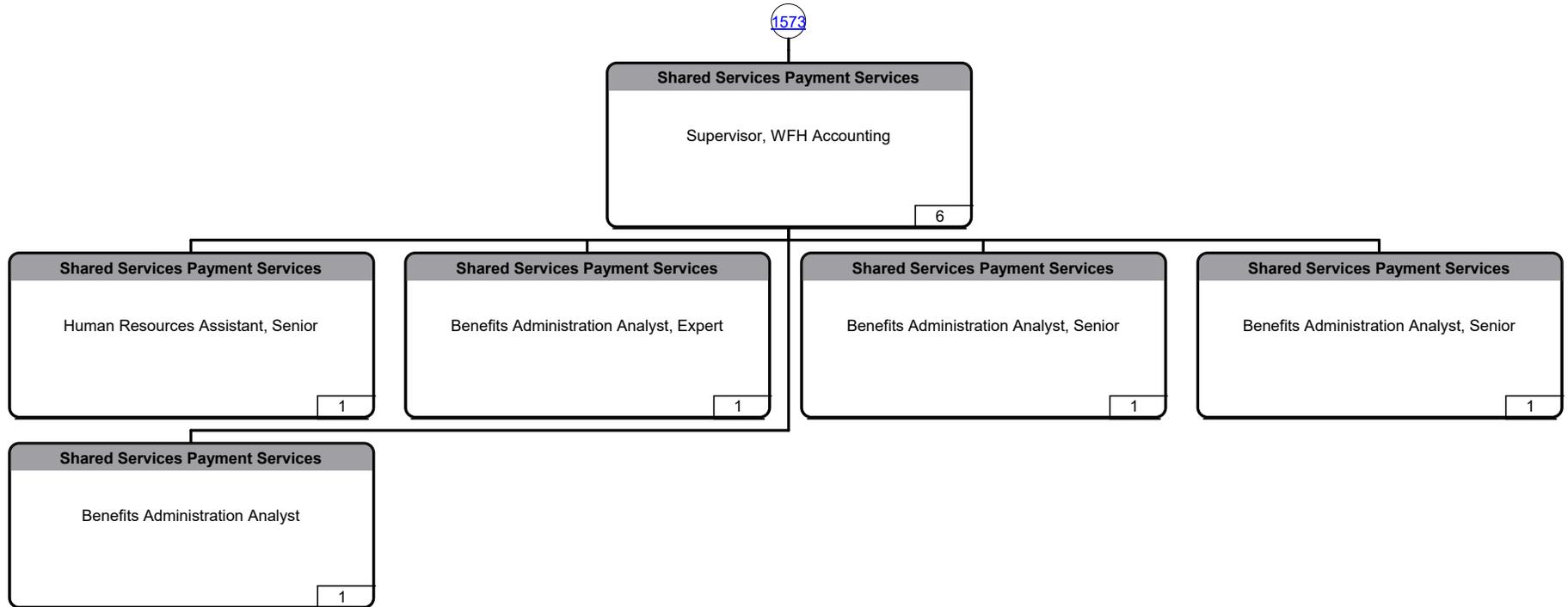
# Enterprise Safety Programs



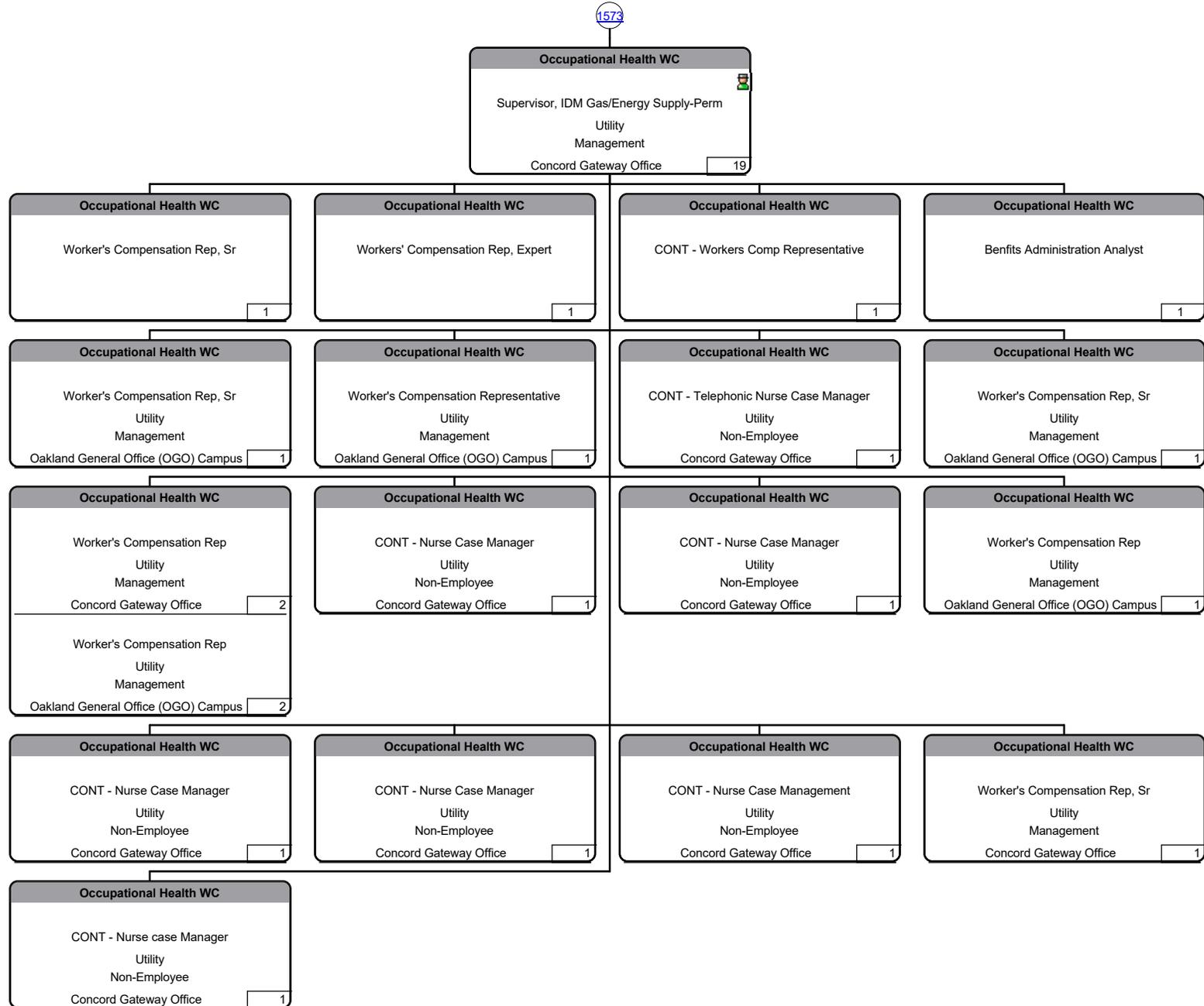
# OH - Injury and Leave Management



### Shared Services Payment Services

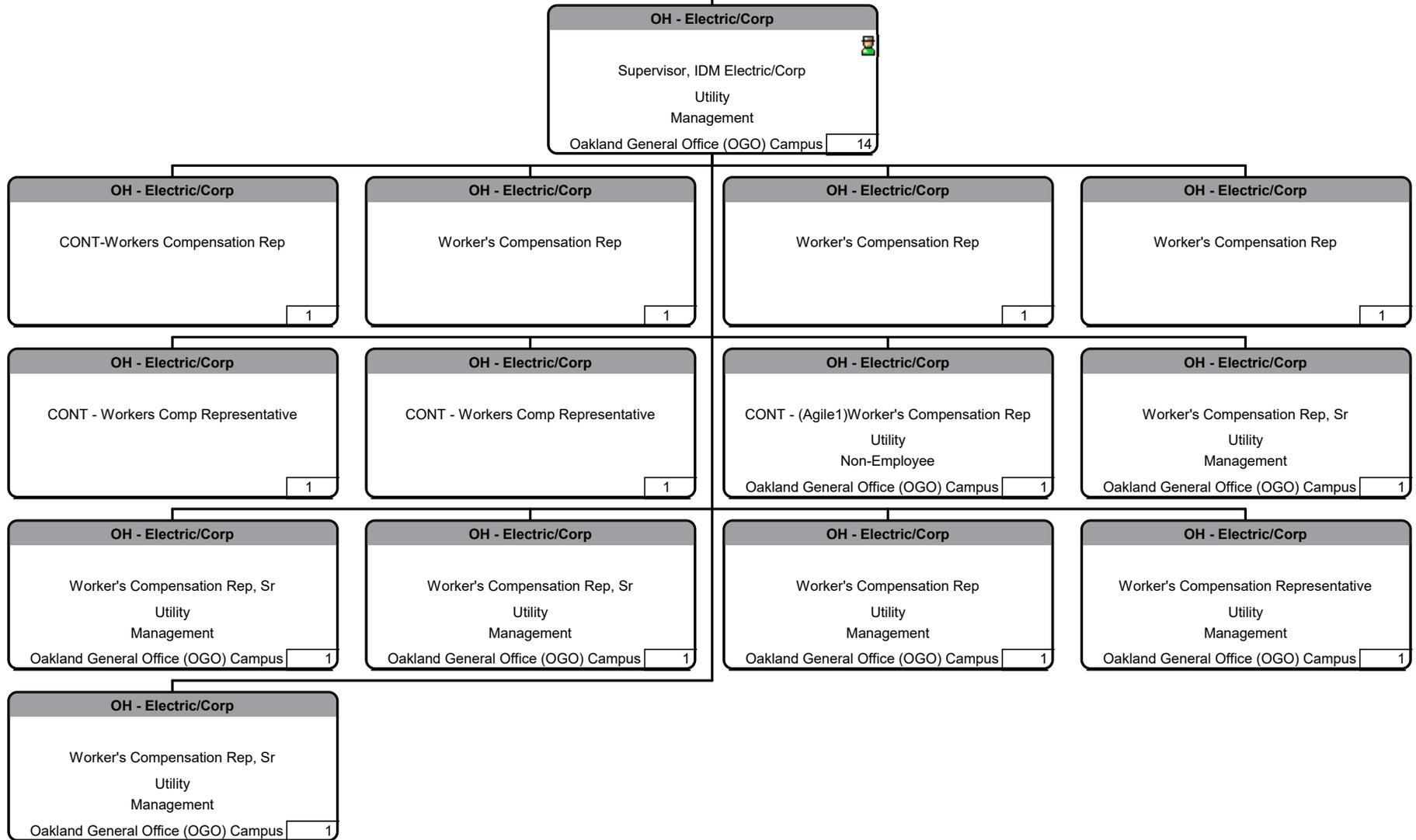


# Occupational Health WC



# OH - Electric/Corp

1573



# OH - Shared Services

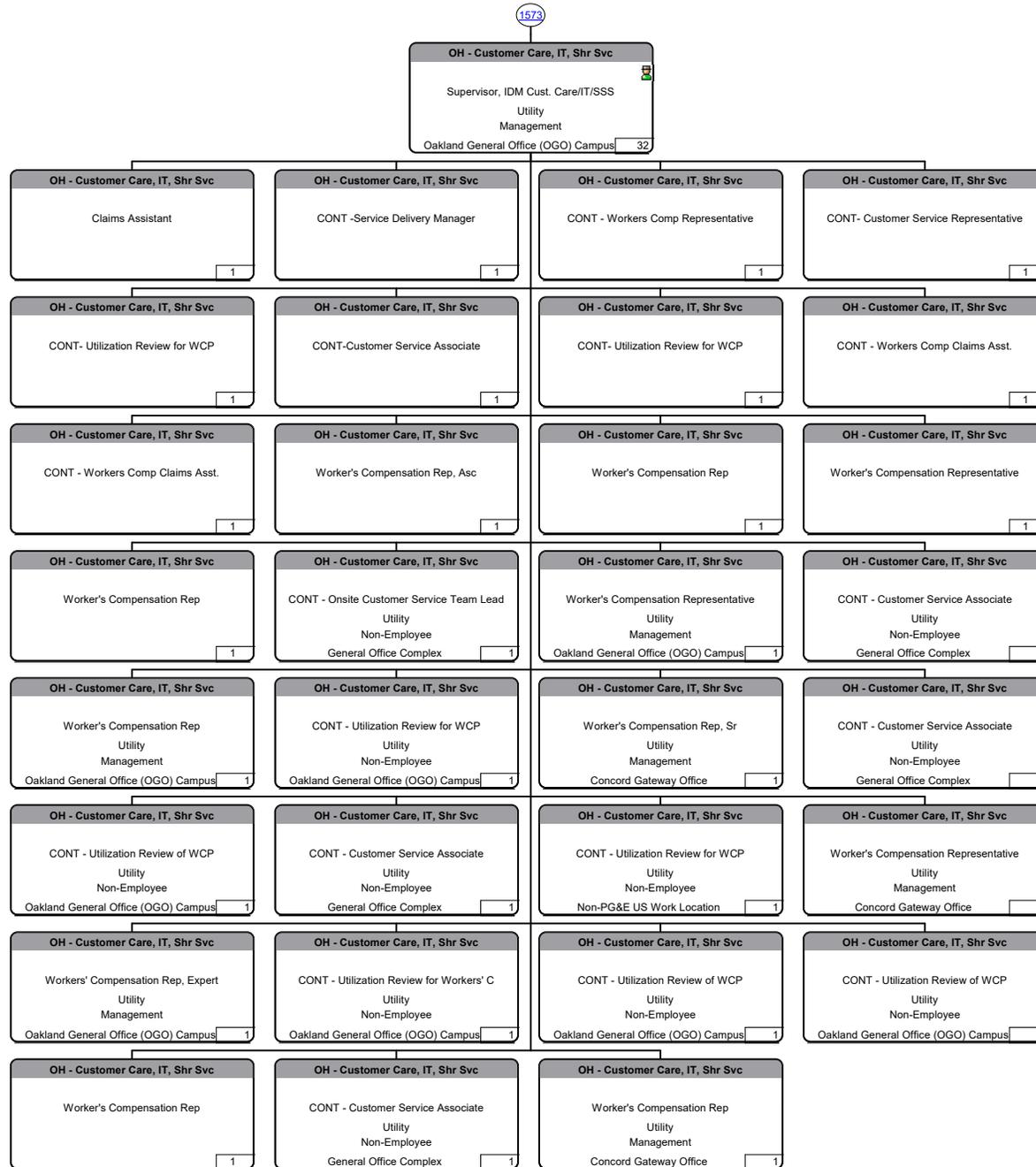
1573

**OH - Shared Services**

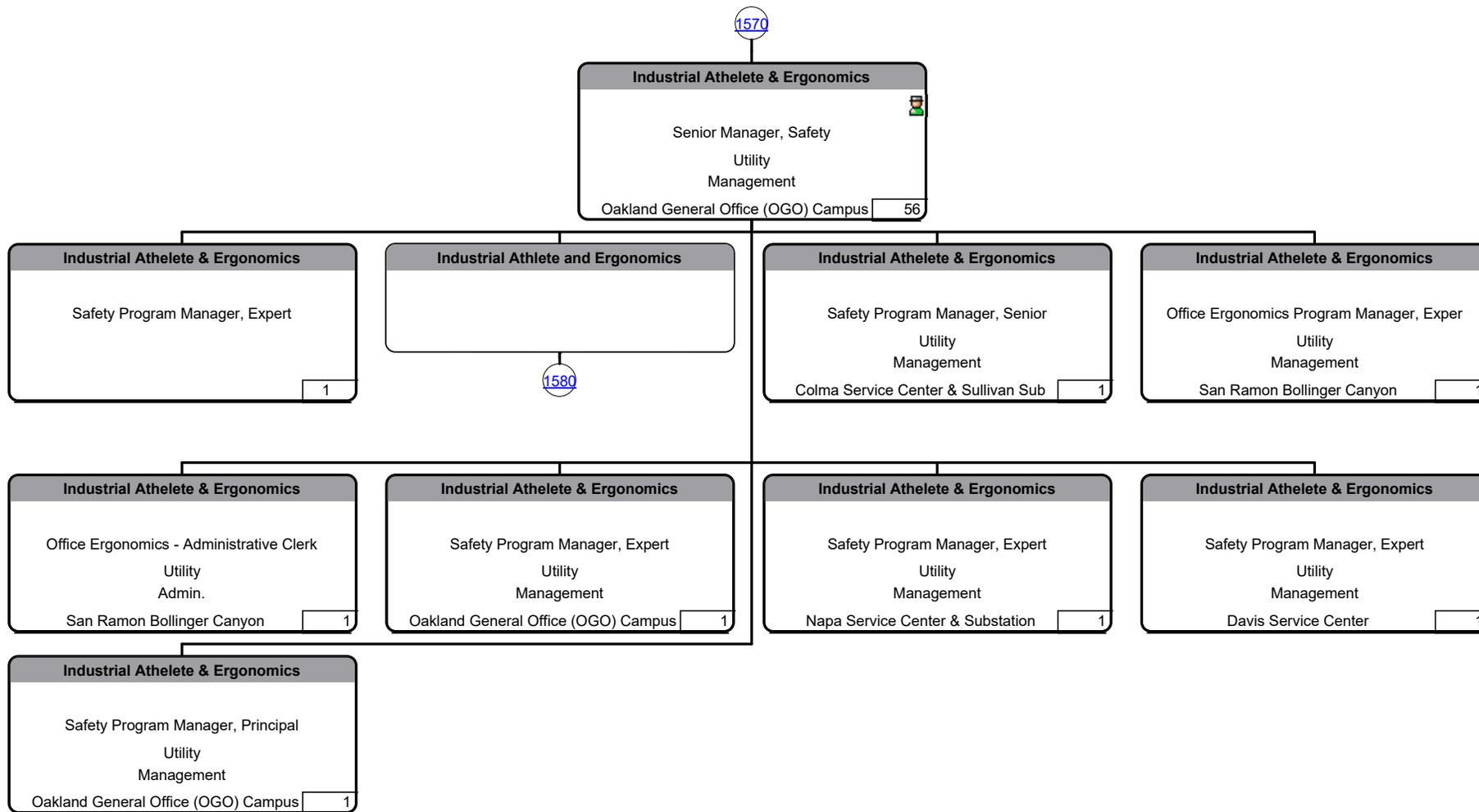
Supervisor, Claim Assistance  
Utility  
Management  
General Office Complex 20



OH - Customer Care, IT, Shr Svc  
 OH - Customer Care, IT, Shr Svc



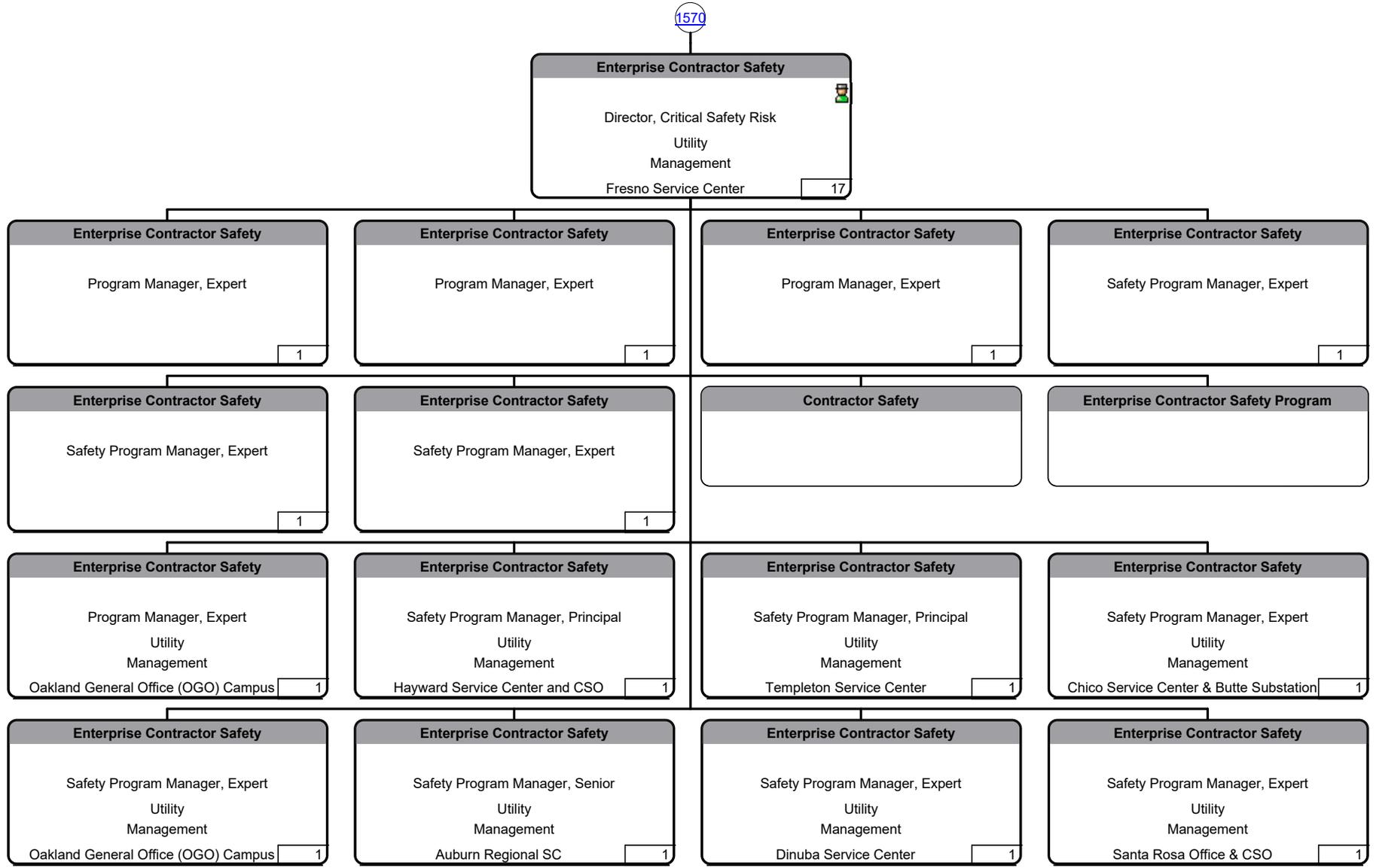
### Industrial Athlete & Ergonomics



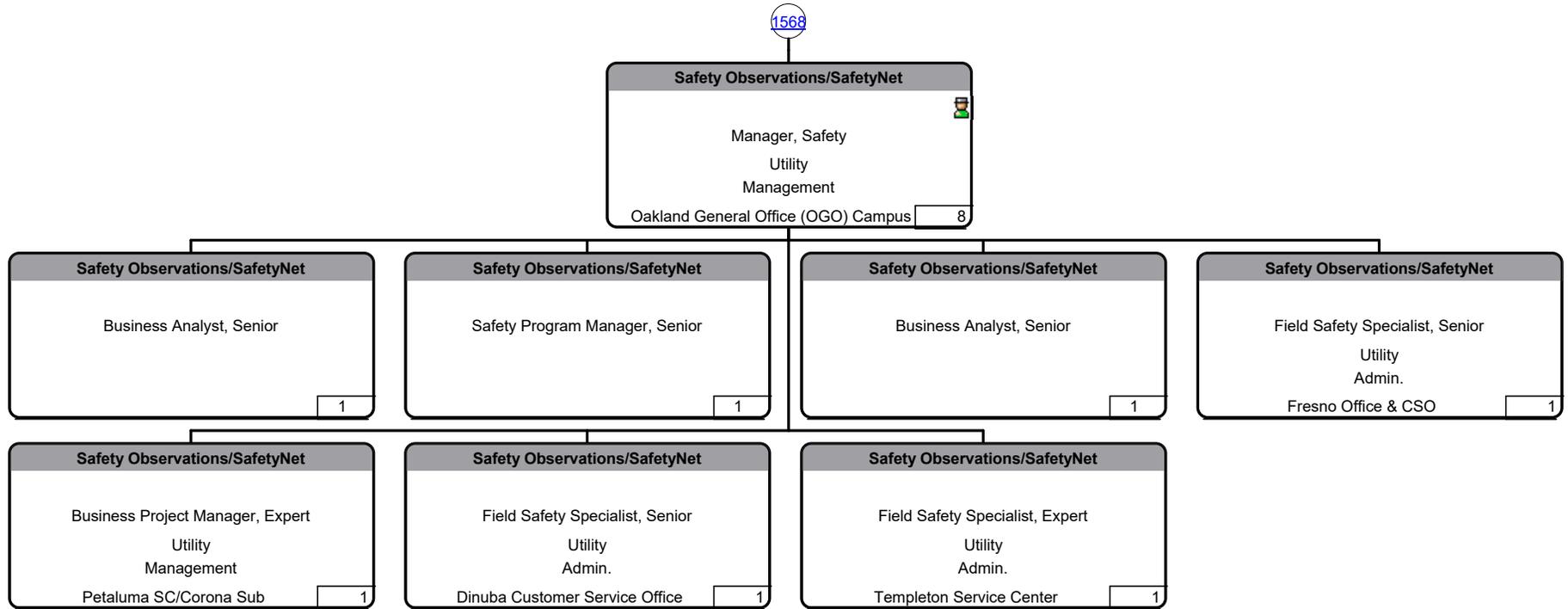


# Enterprise Contractor Safety

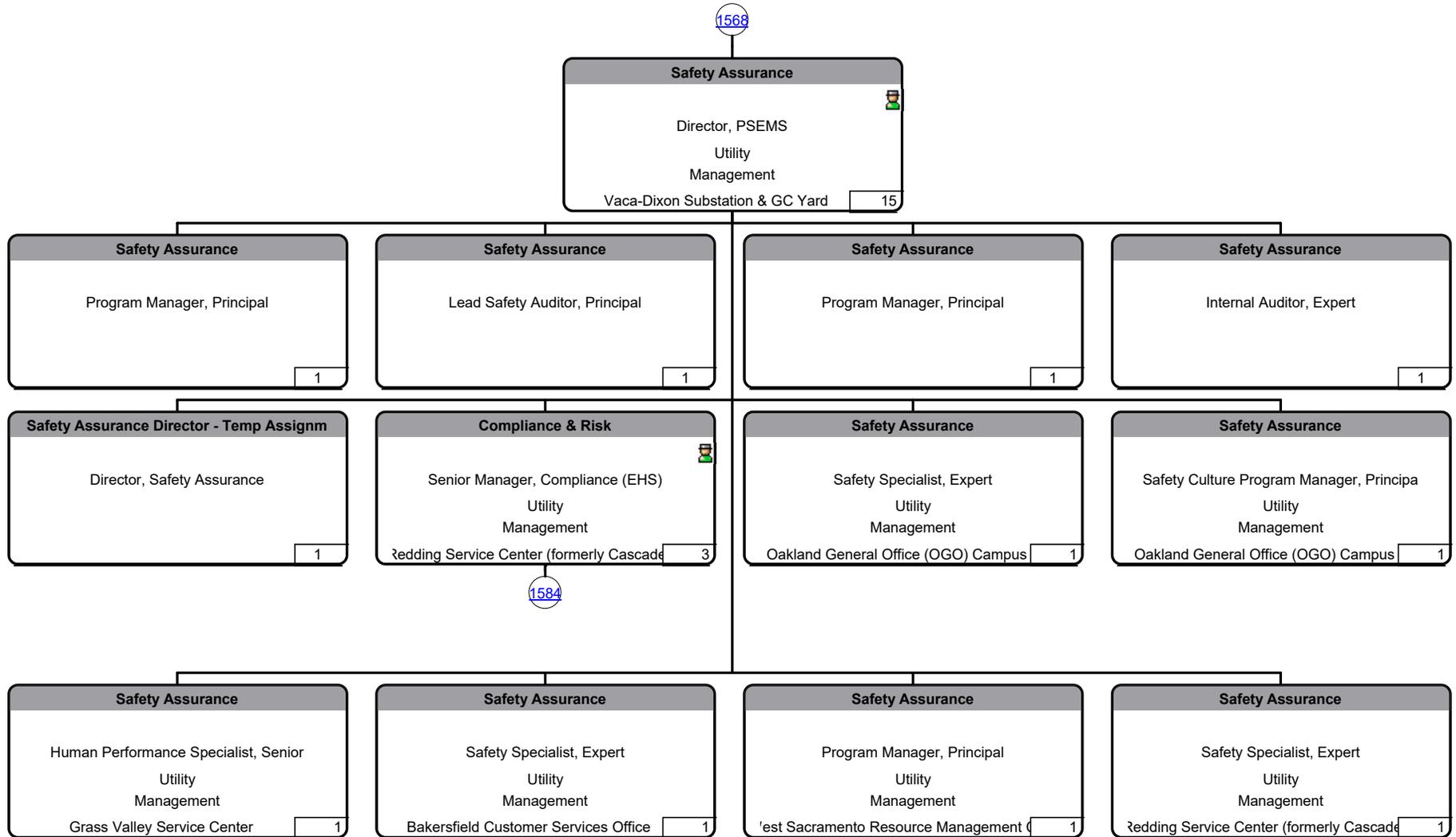
1570



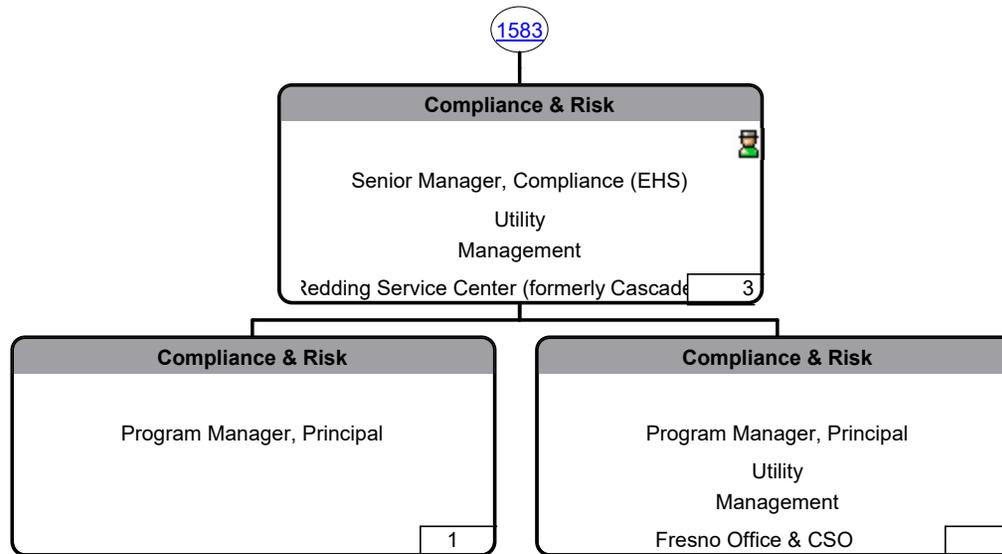
### Safety Observations/SafetyNet



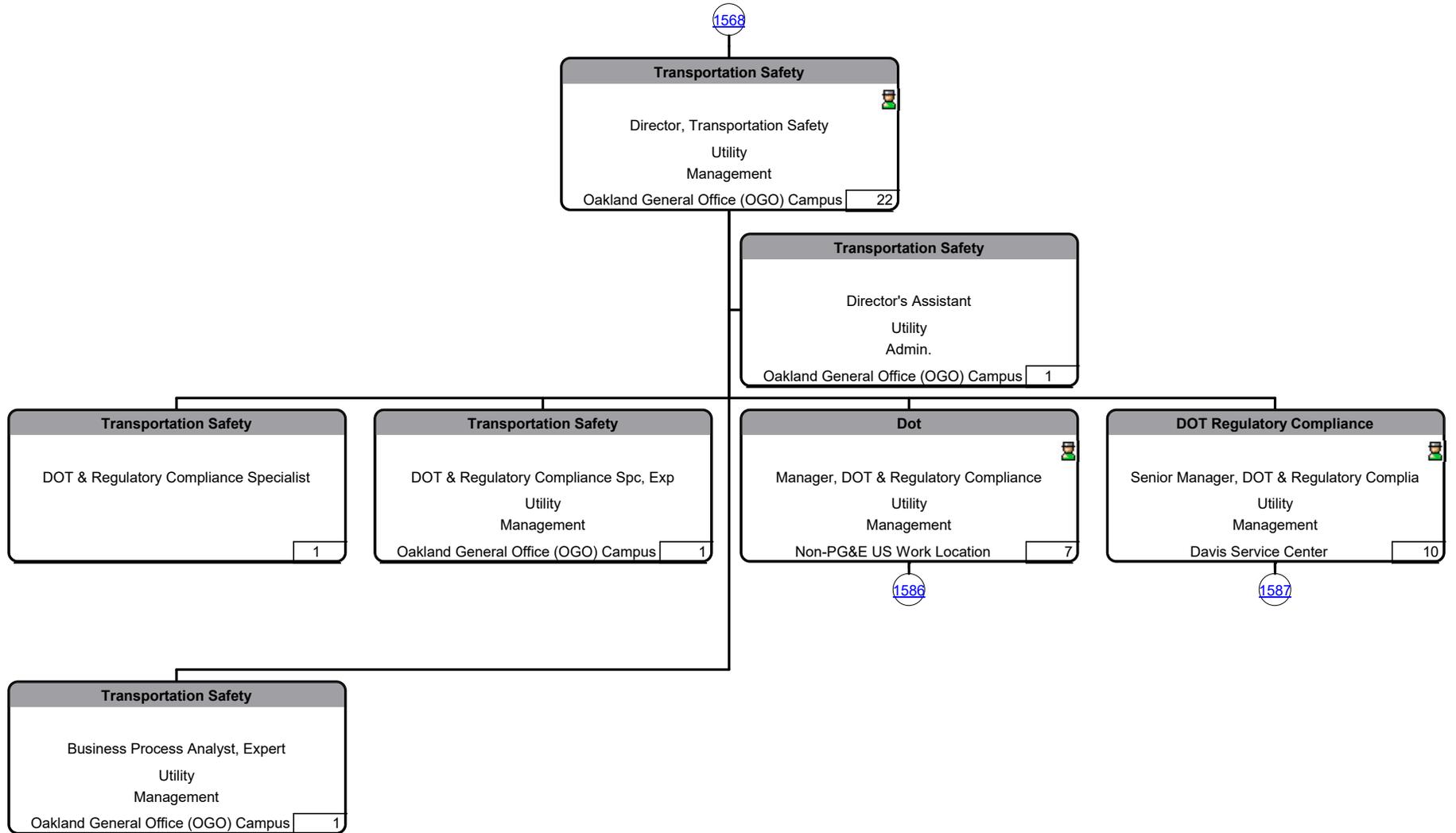
# Safety Assurance

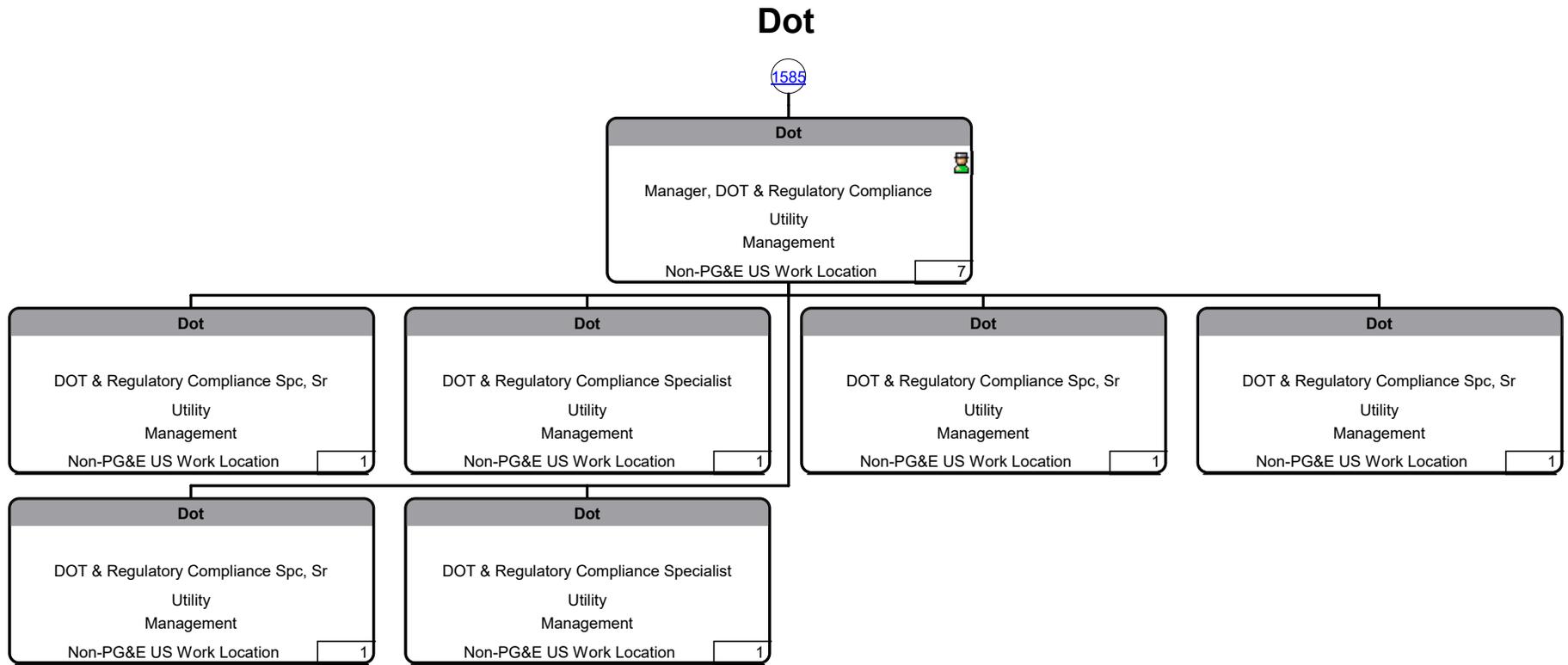


# Compliance & Risk

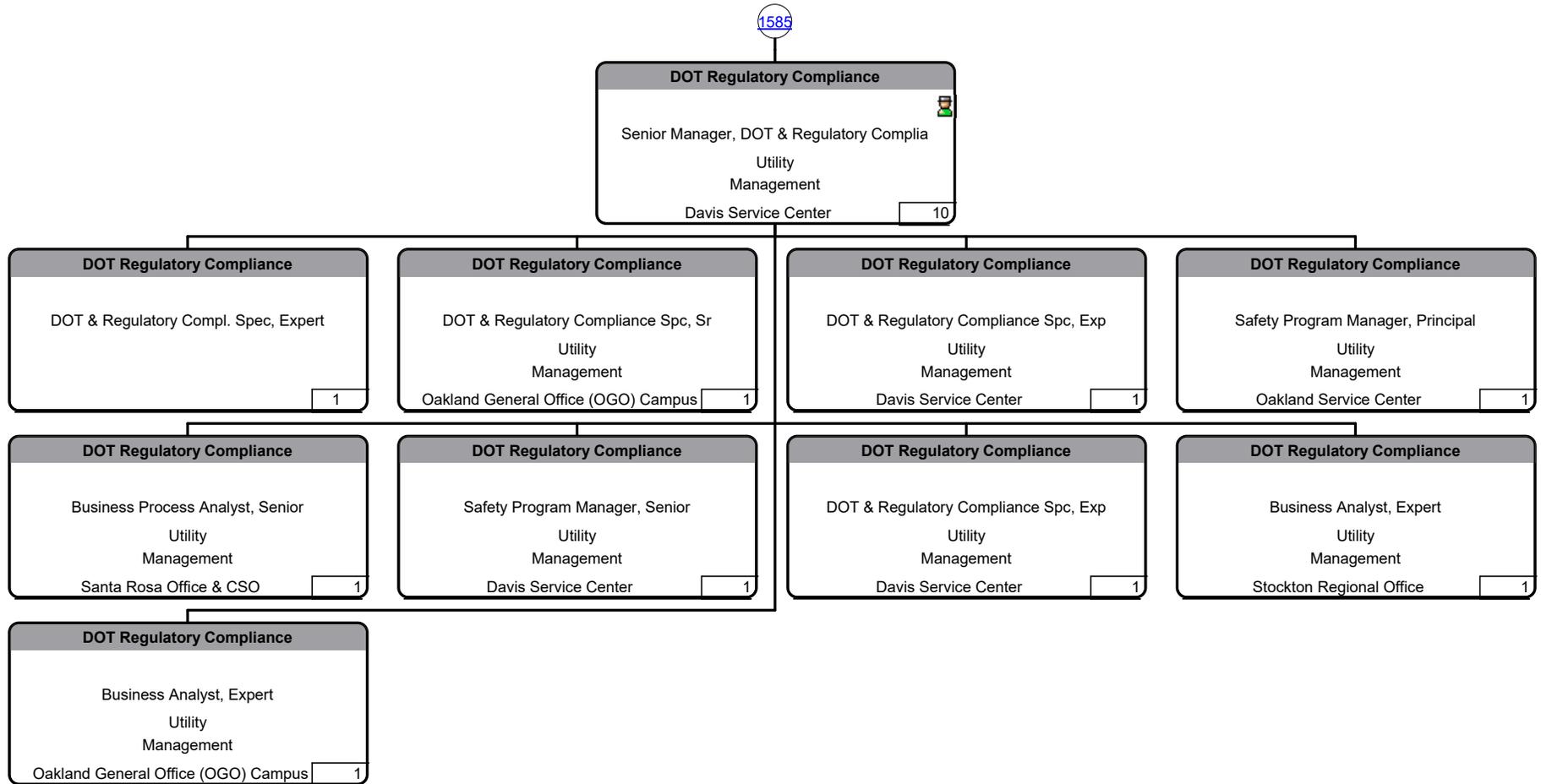


# Transportation Safety

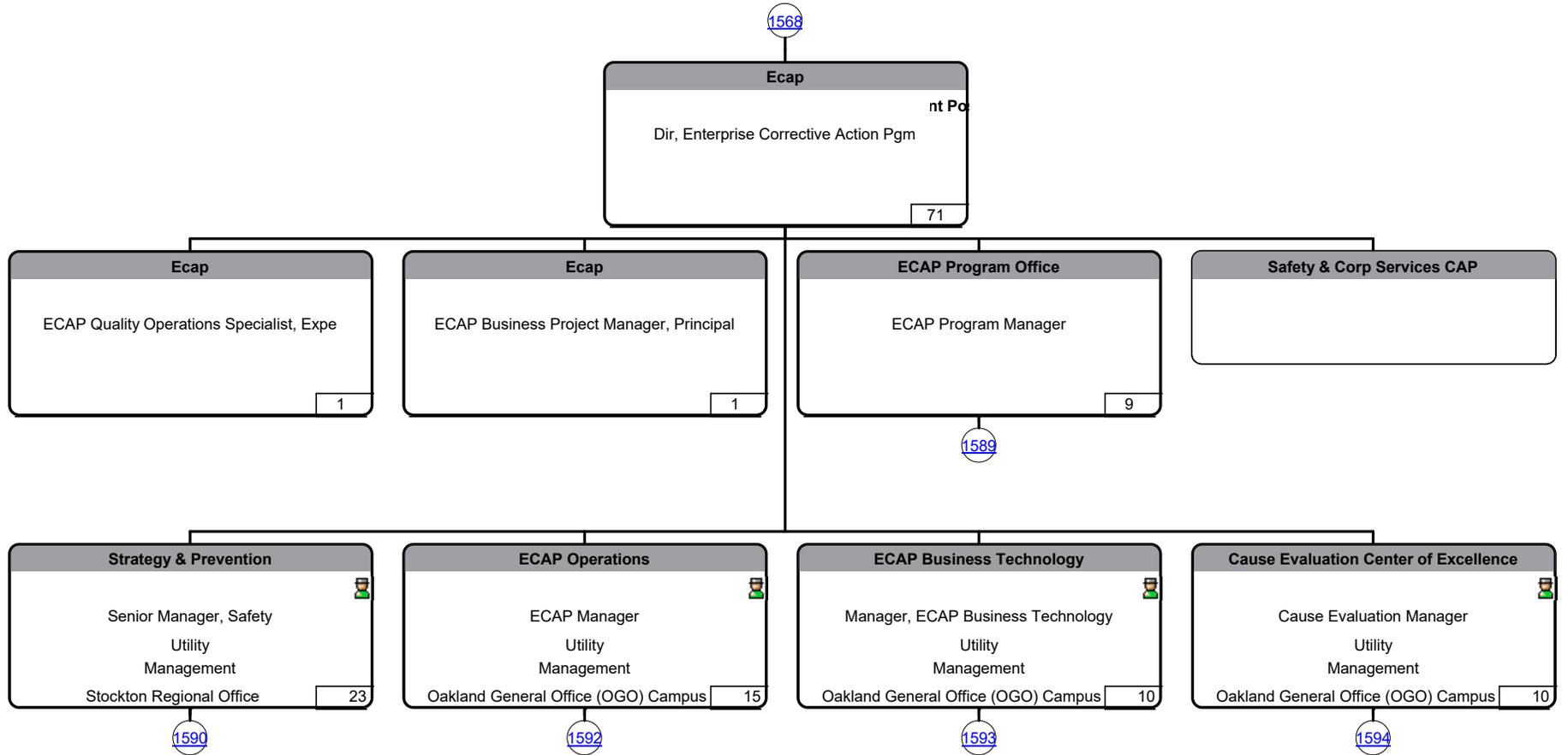




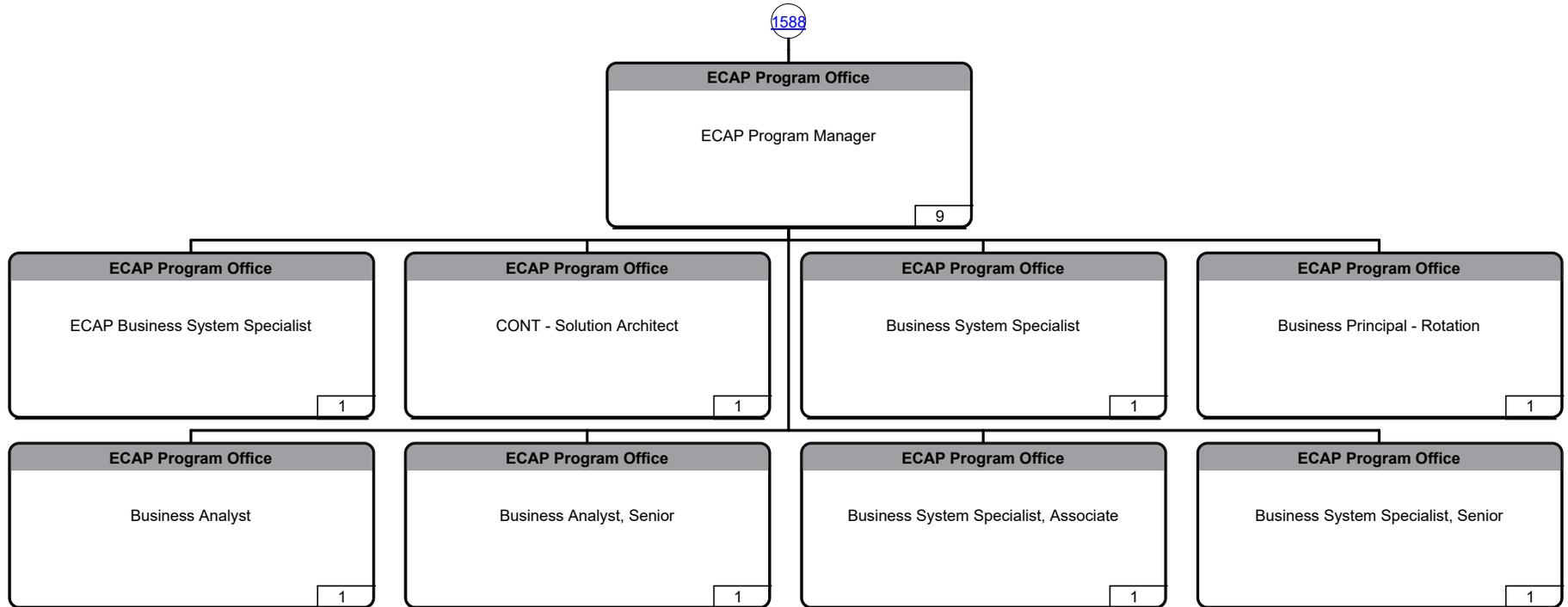
# DOT Regulatory Compliance



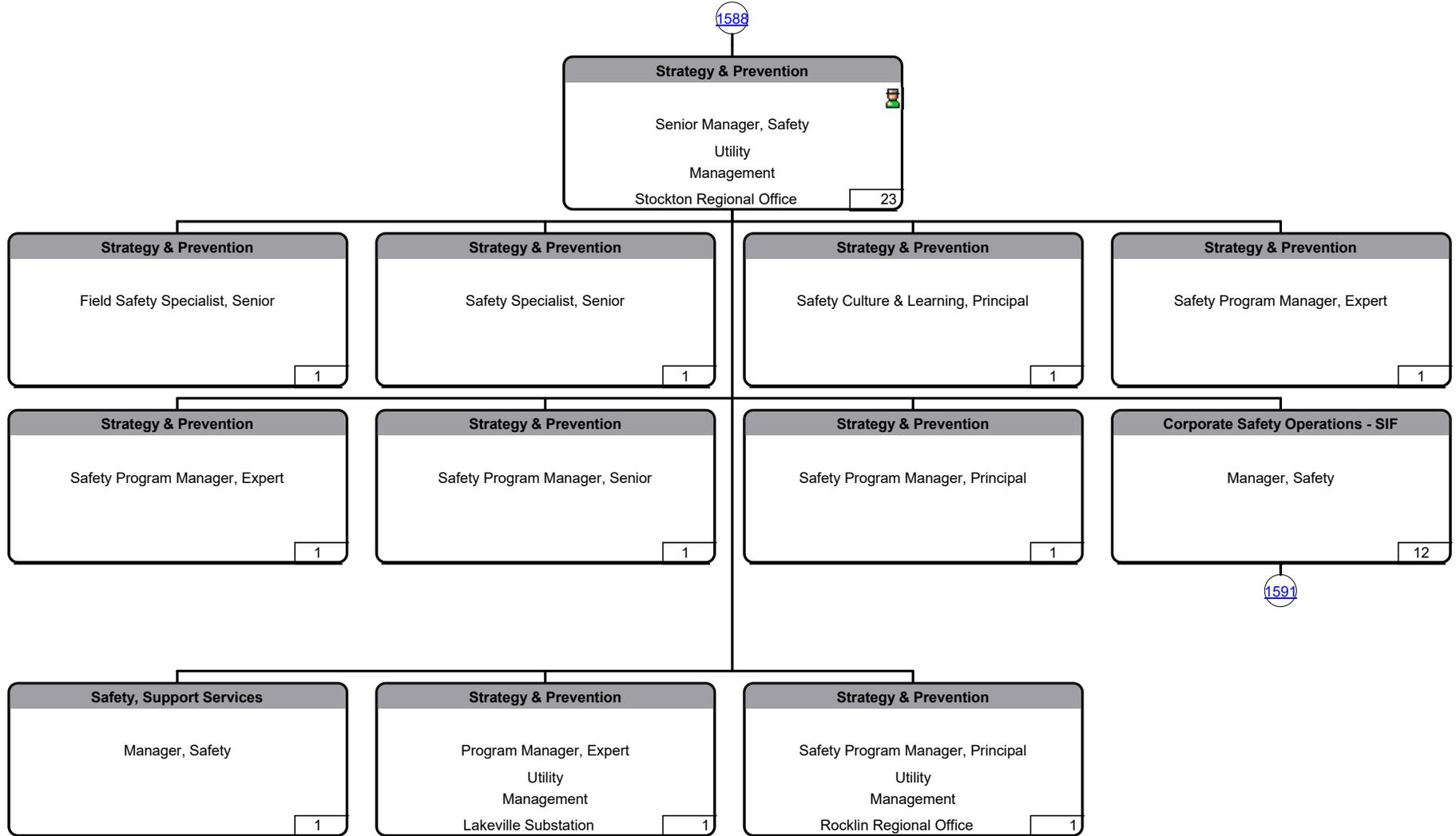
# Ecap



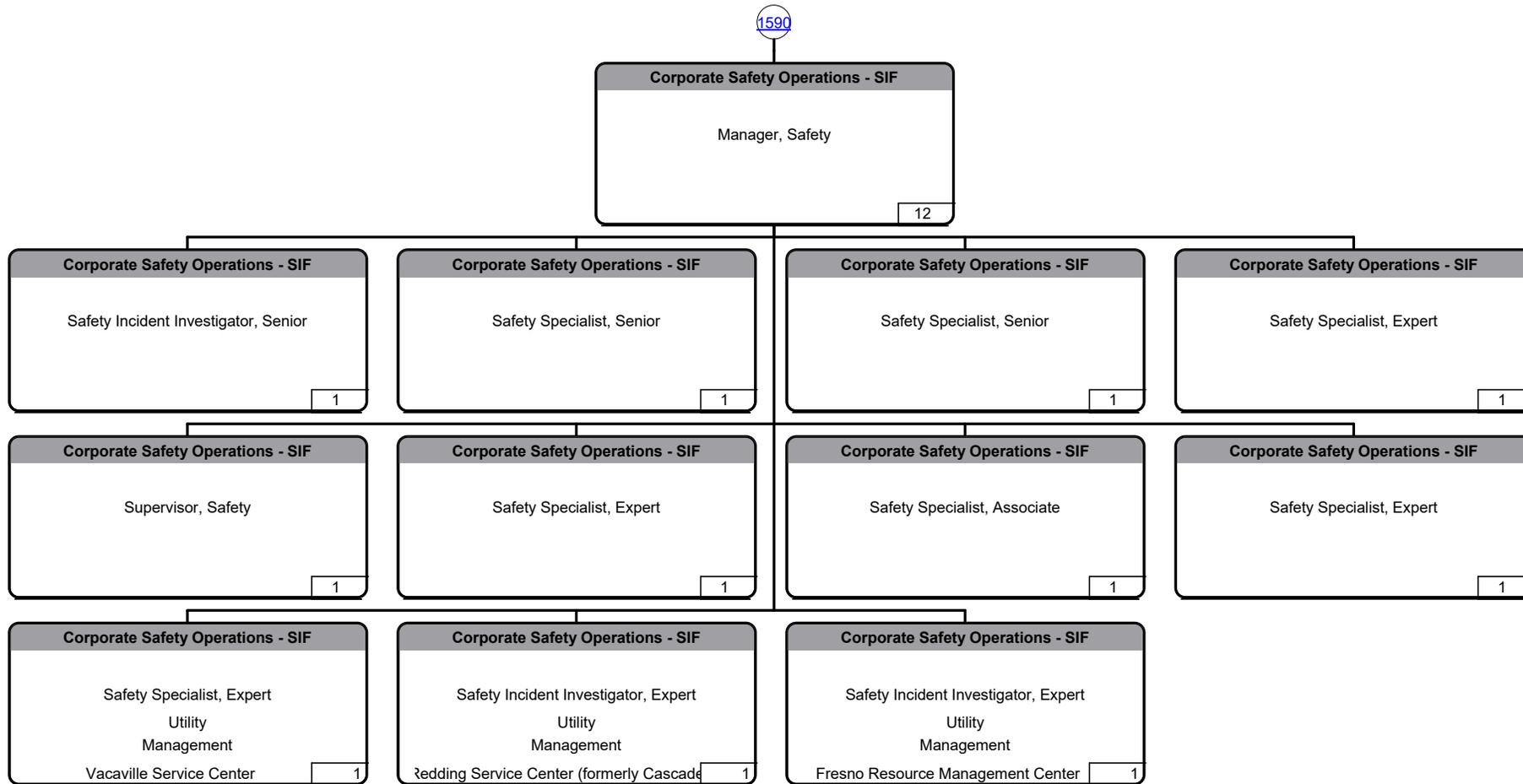
# ECAP Program Office



# Strategy & Prevention

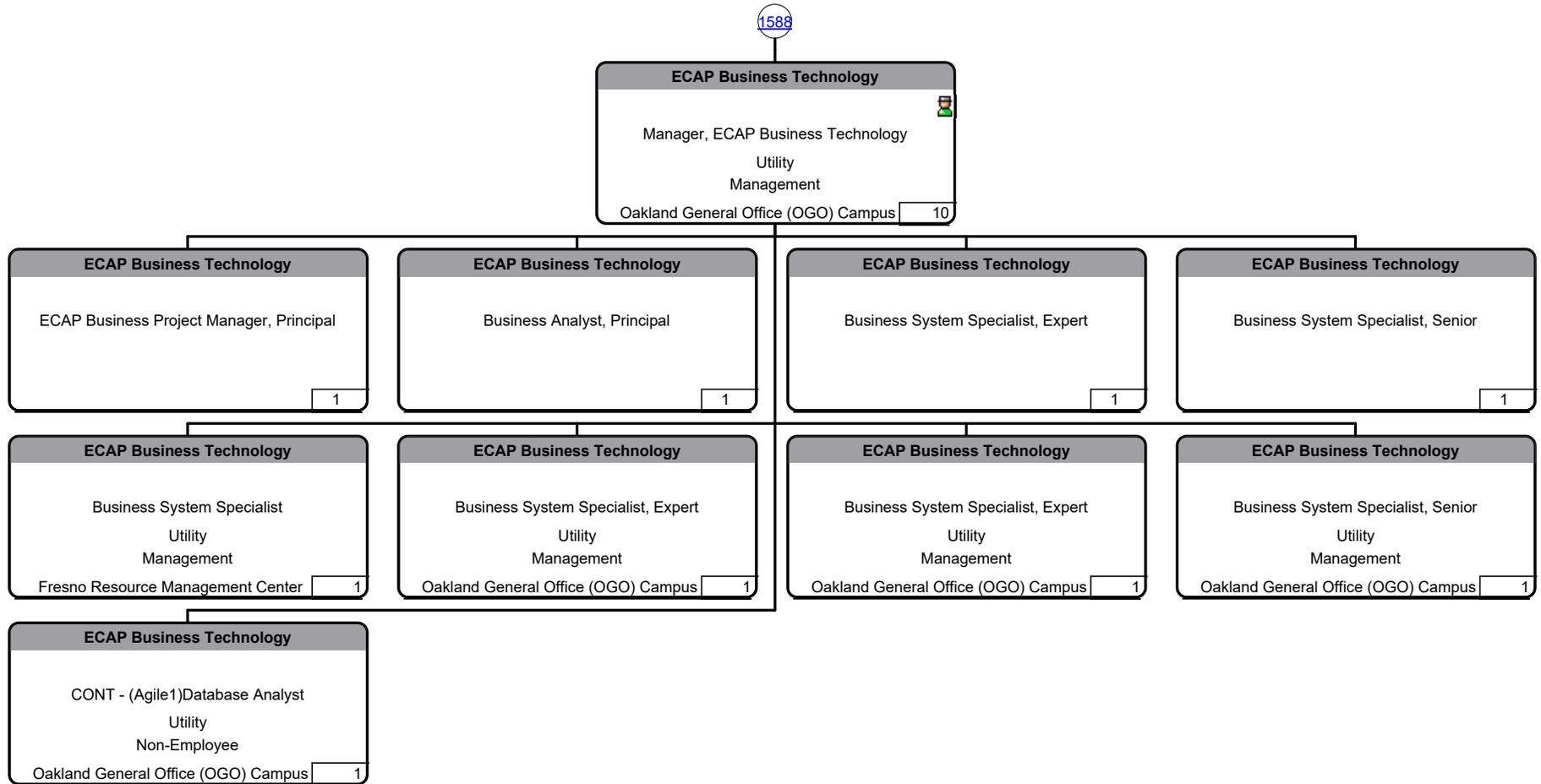


### Corporate Safety Operations - SIF

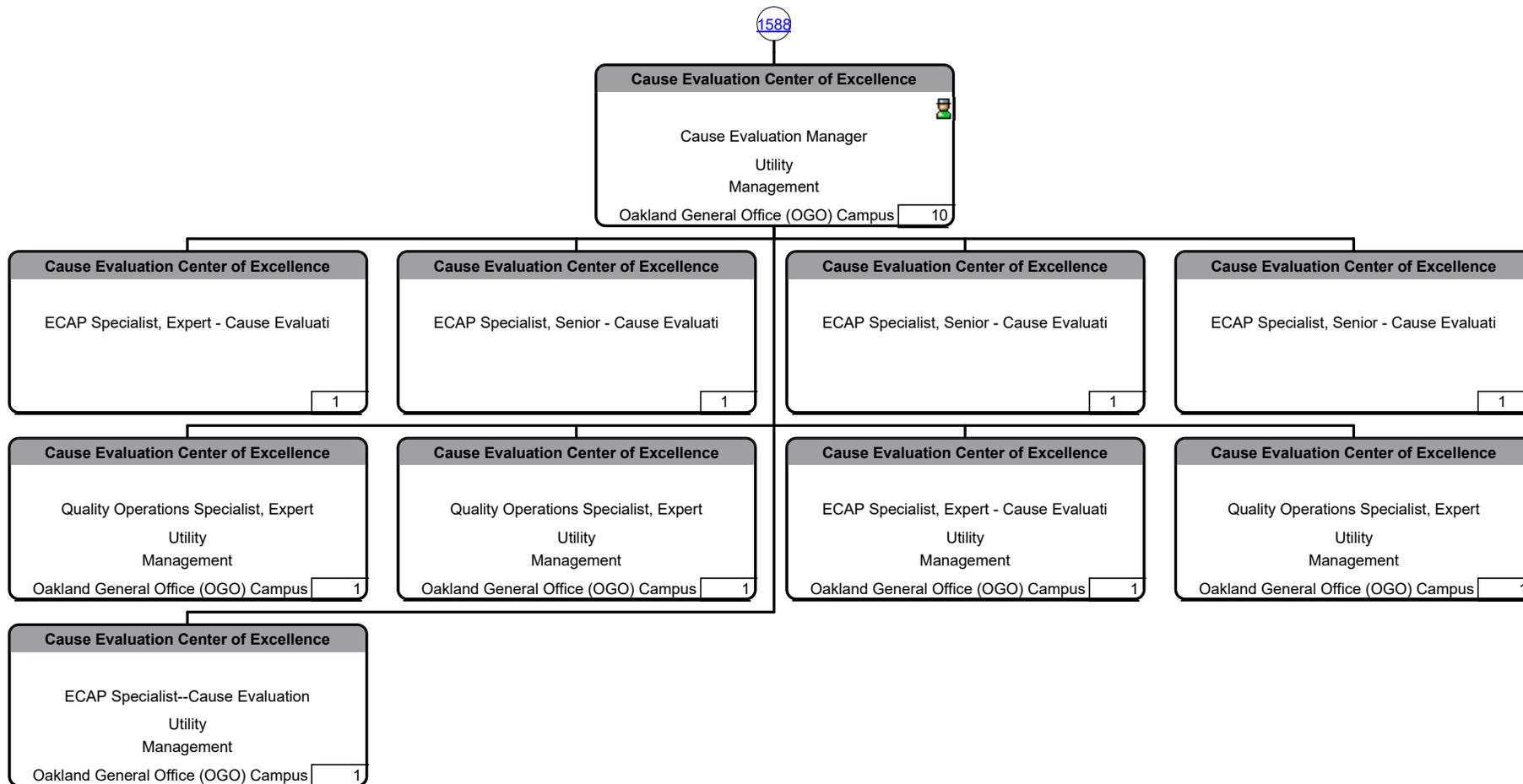




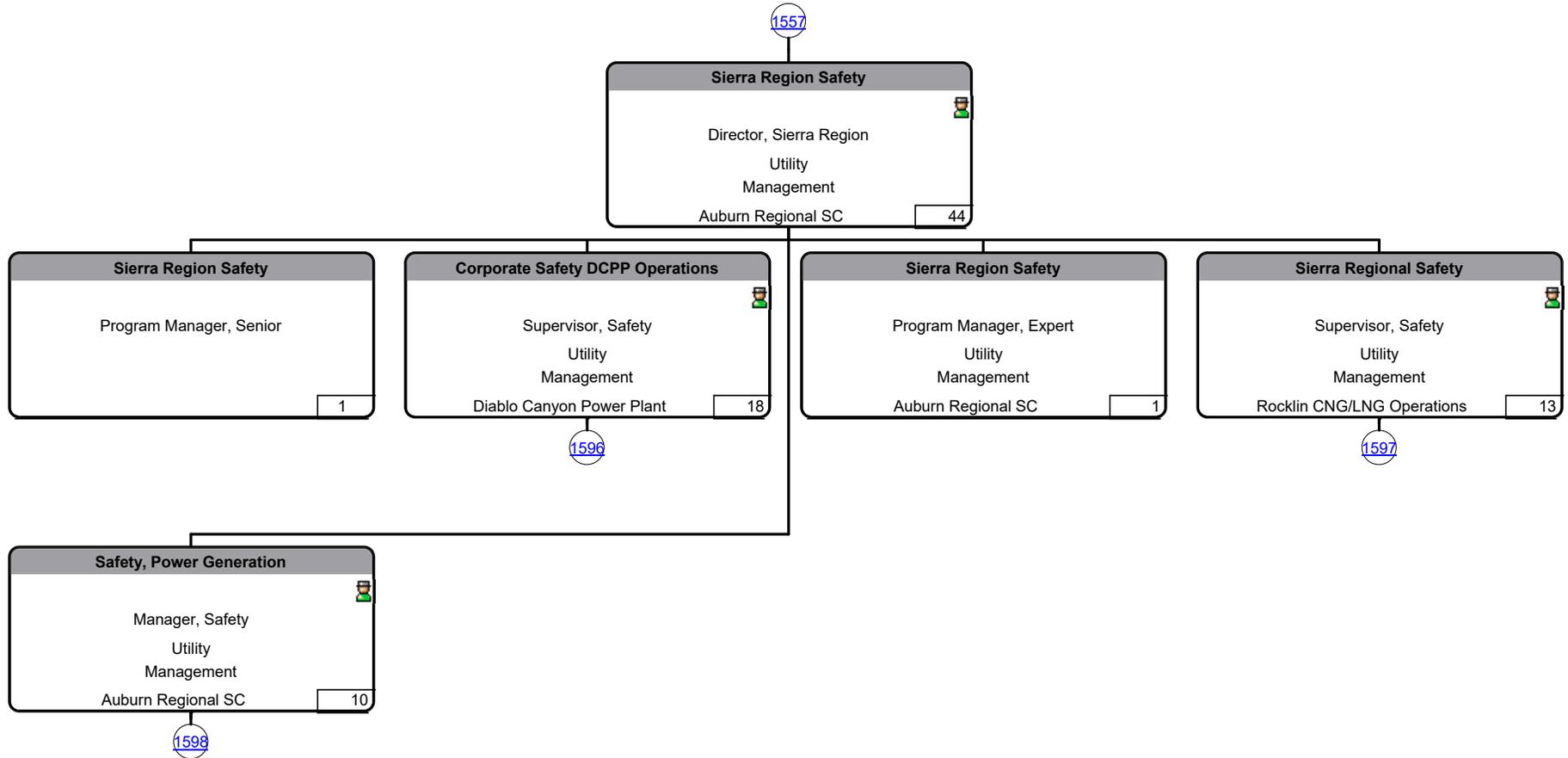
# ECAP Business Technology



### Cause Evaluation Center of Excellence

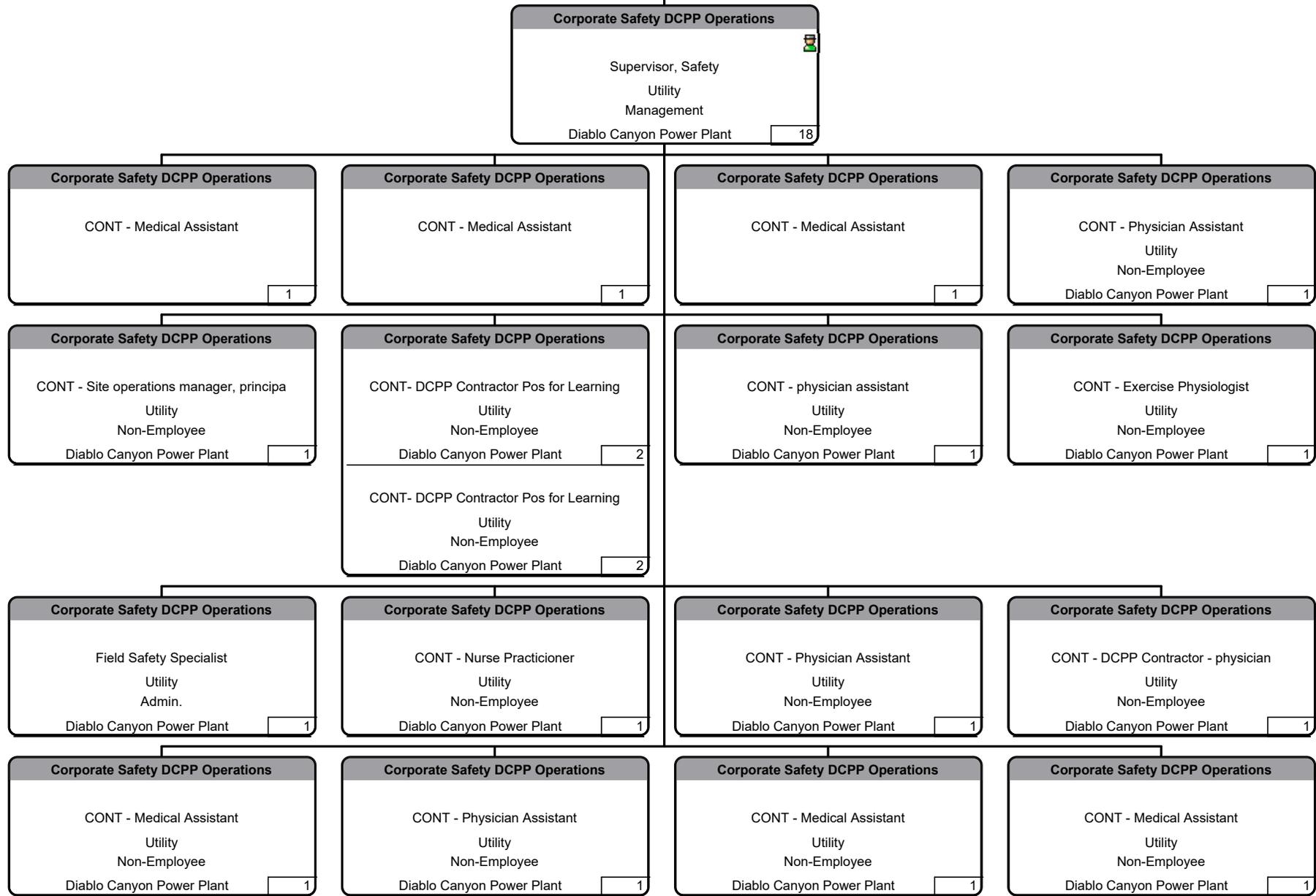


# Sierra Region Safety

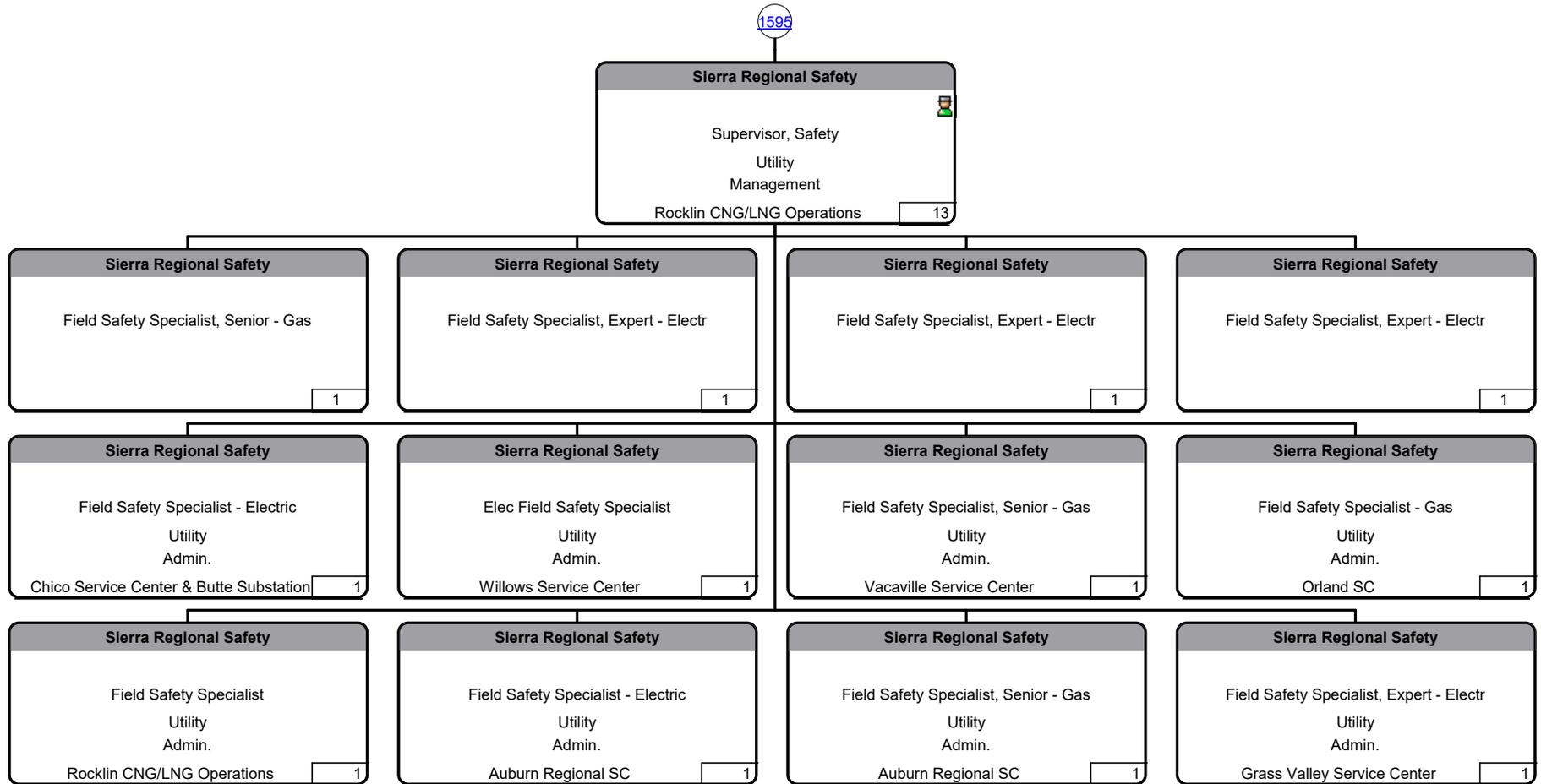


# Corporate Safety DCPD Operations

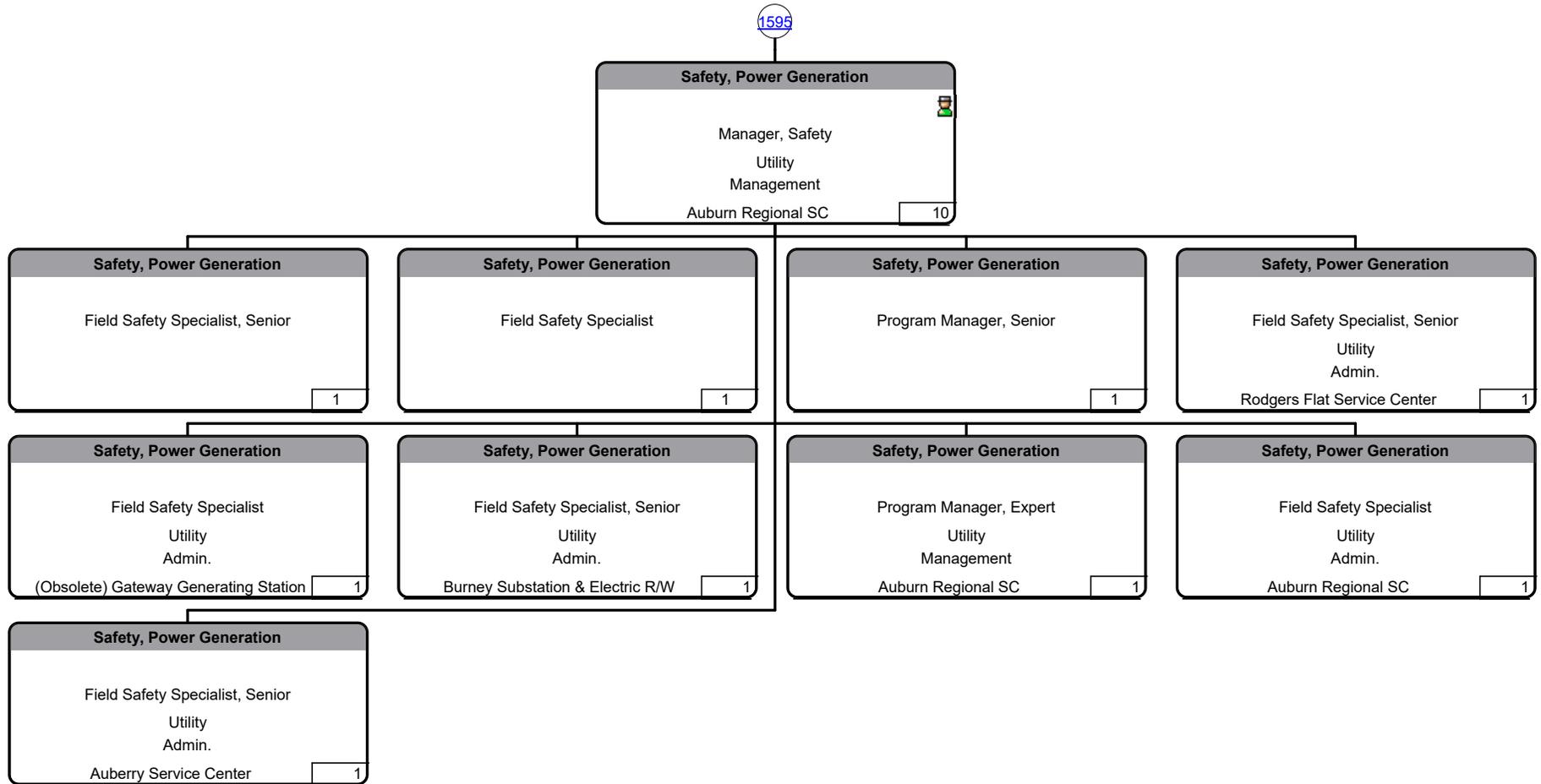
1595



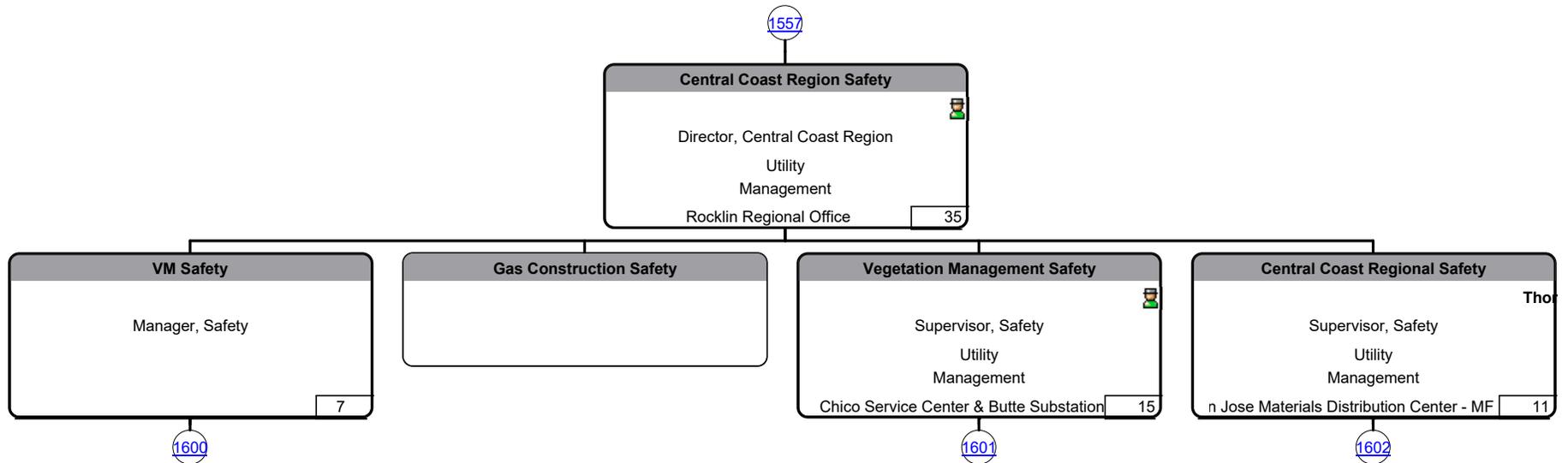
# Sierra Regional Safety



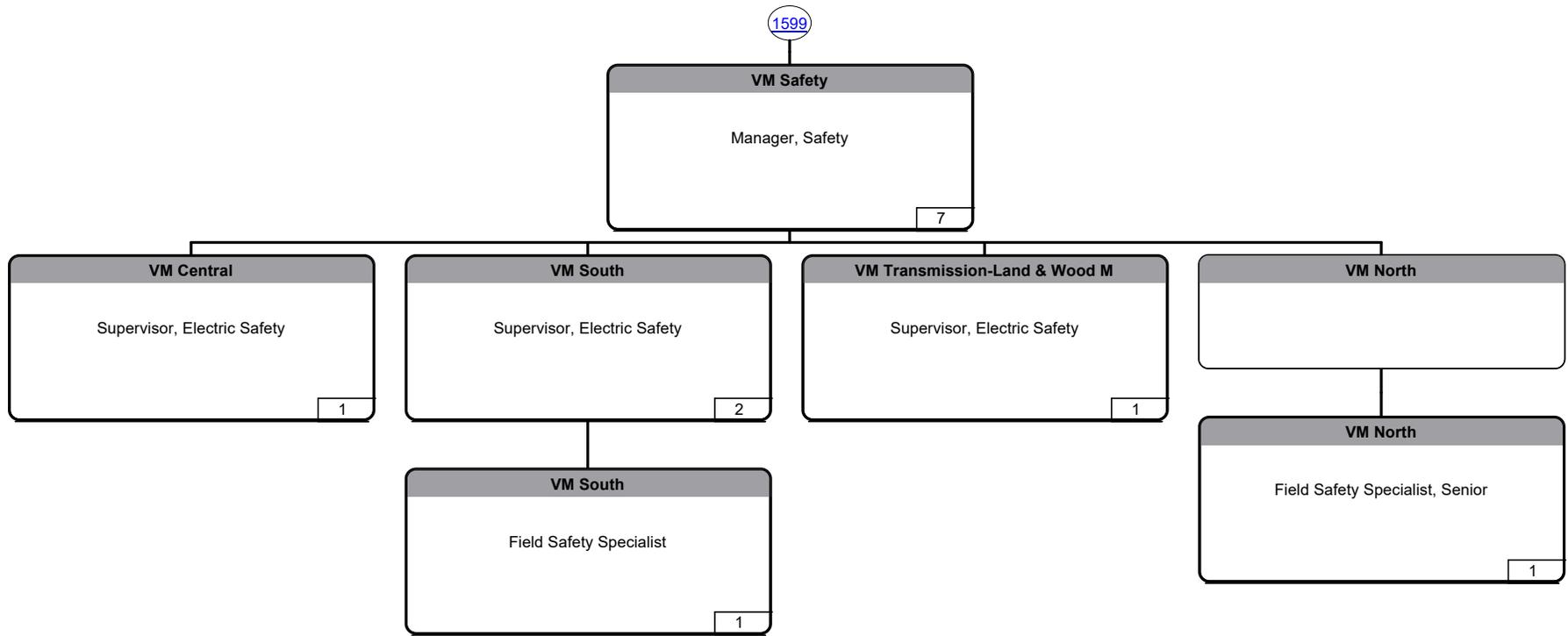
### Safety, Power Generation



### Central Coast Region Safety

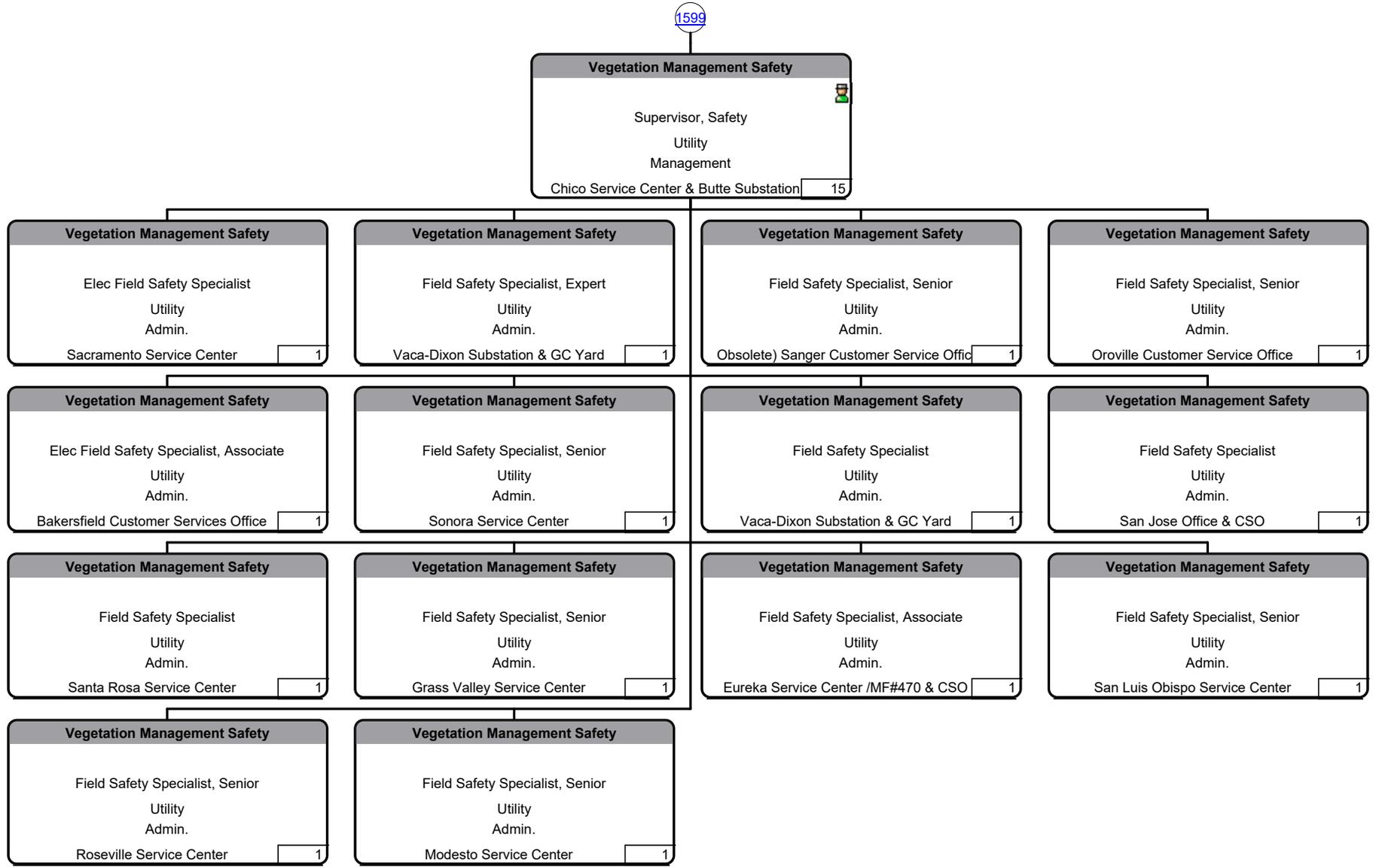


# VM Safety

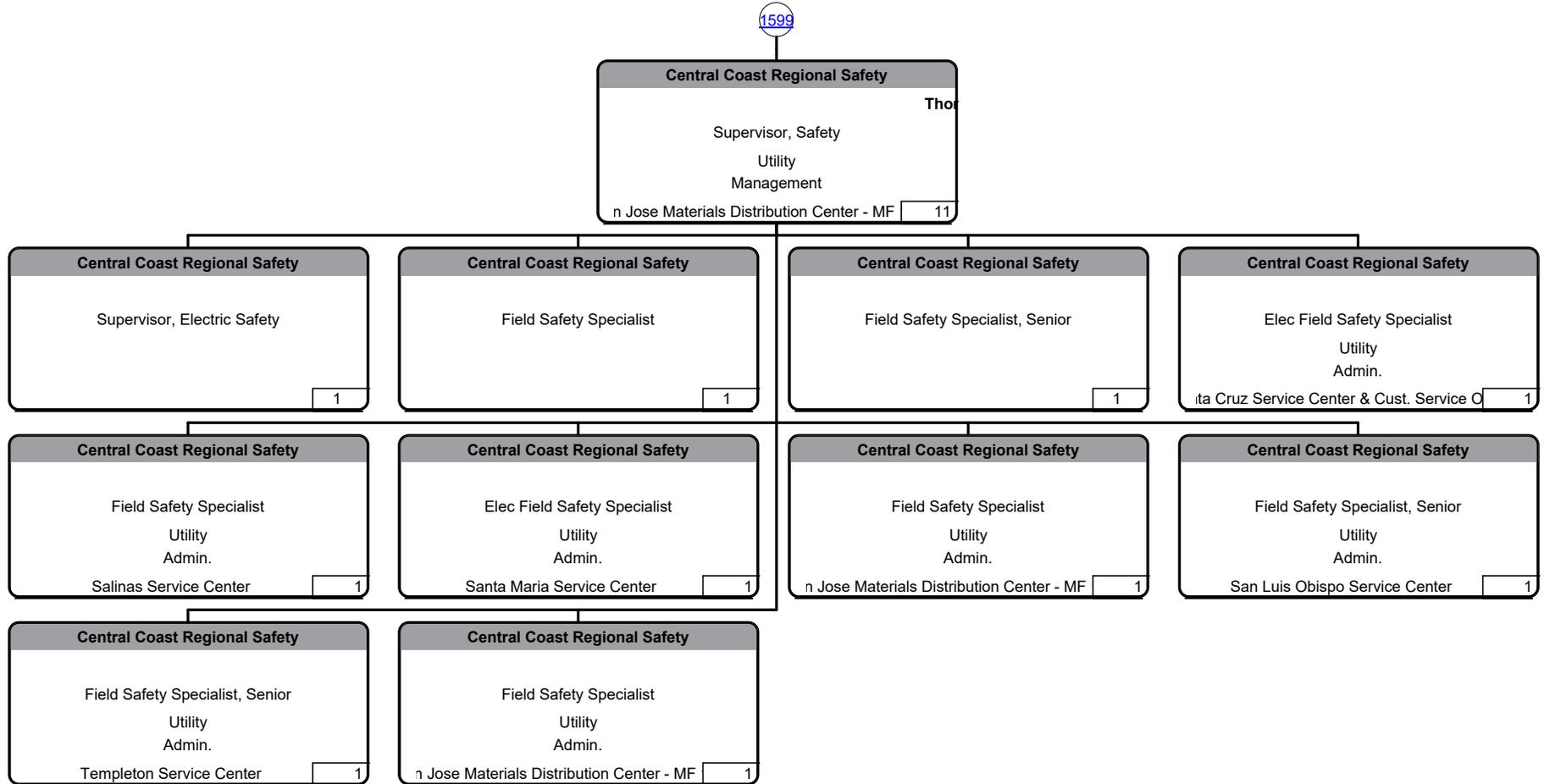


# Vegetation Management Safety

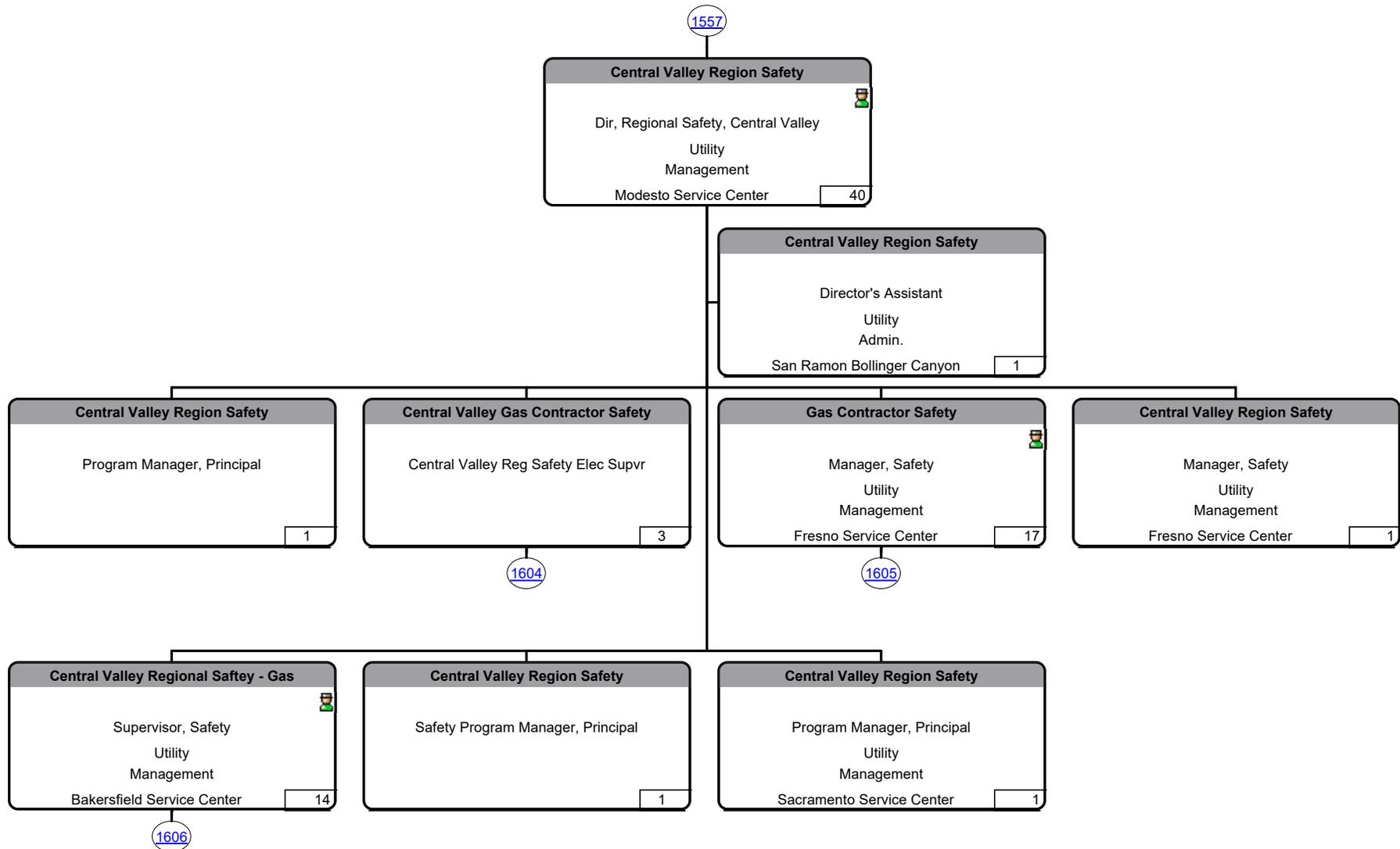
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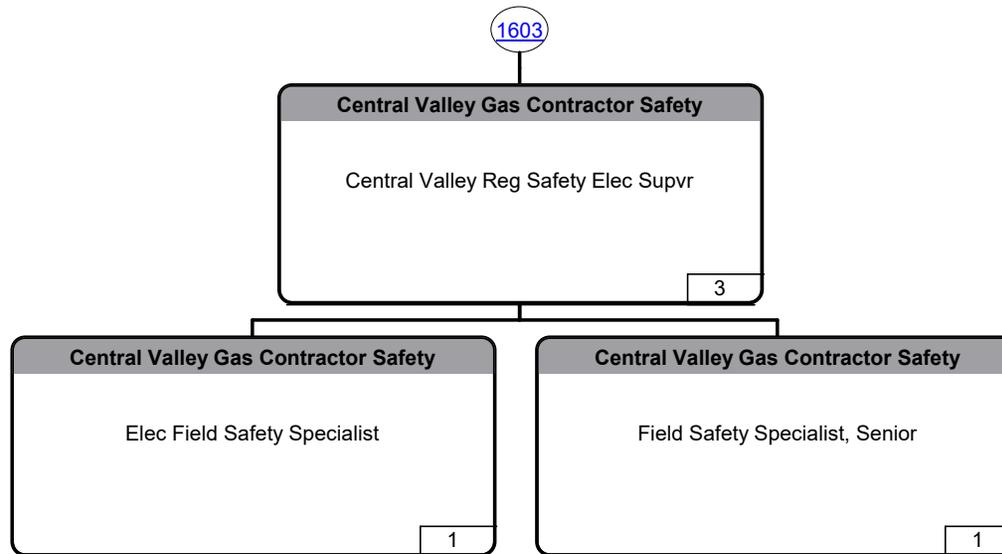
### Central Coast Regional Safety



# Central Valley Region Safety

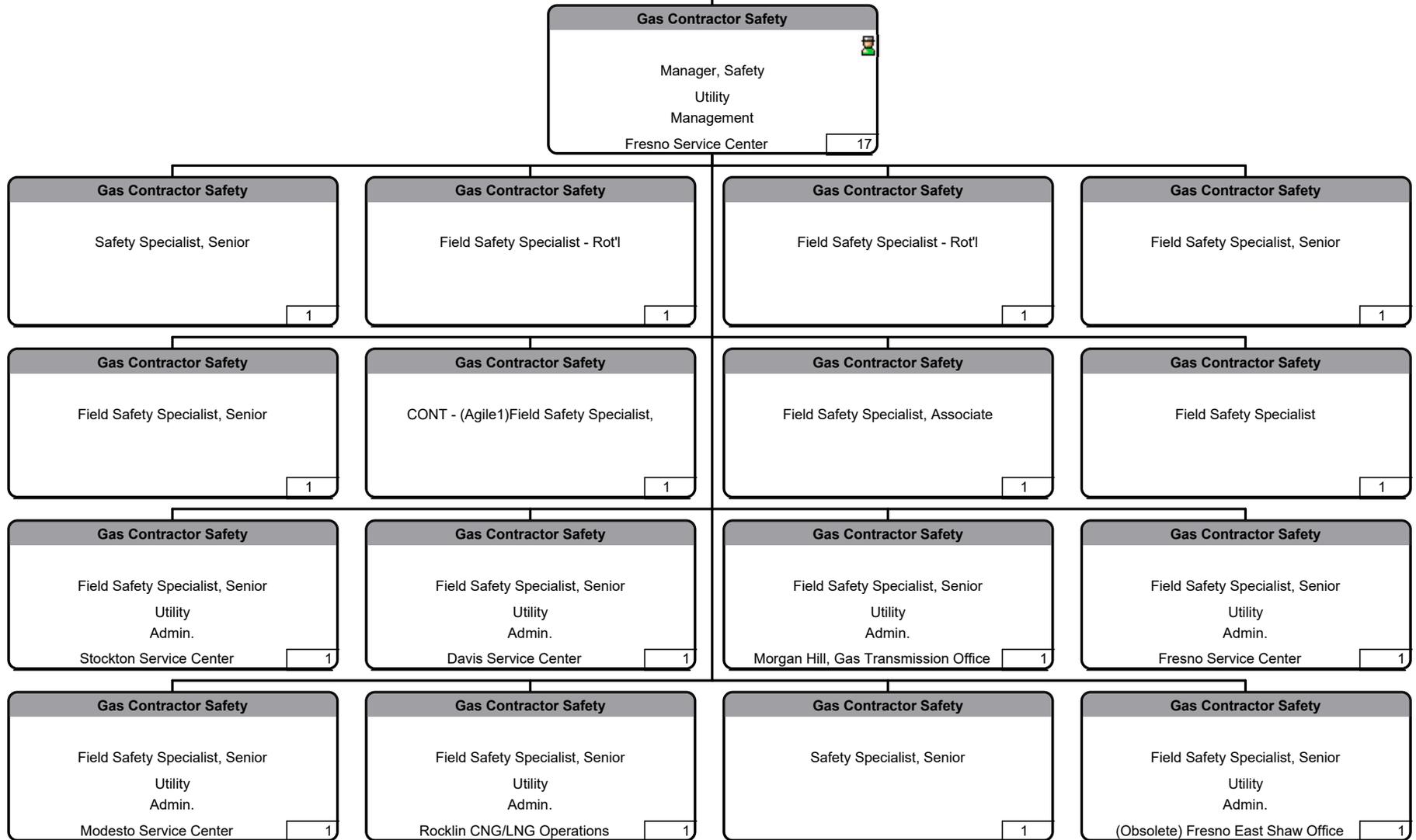


# Central Valley Gas Contractor Safety



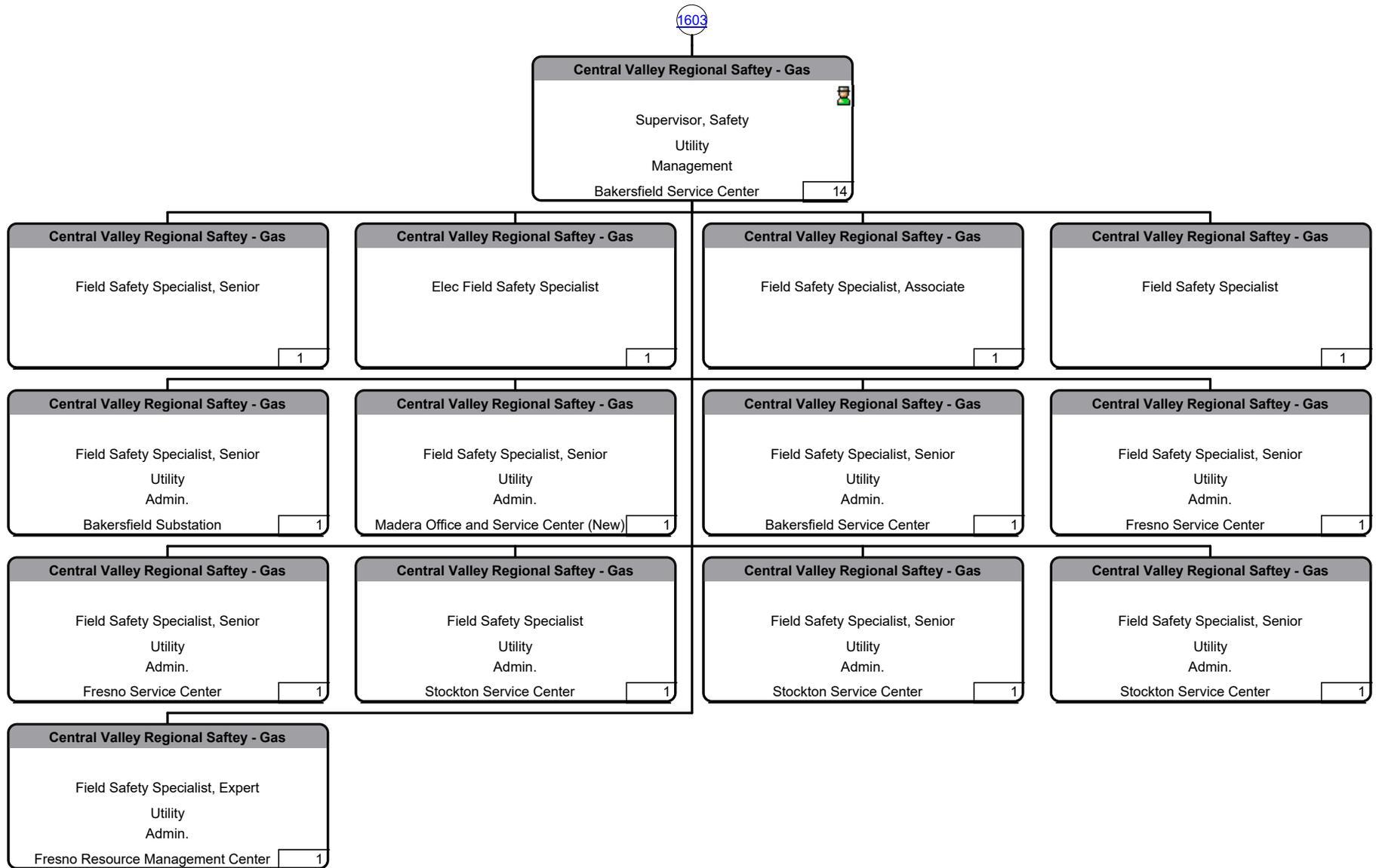
# Gas Contractor Safety

1603

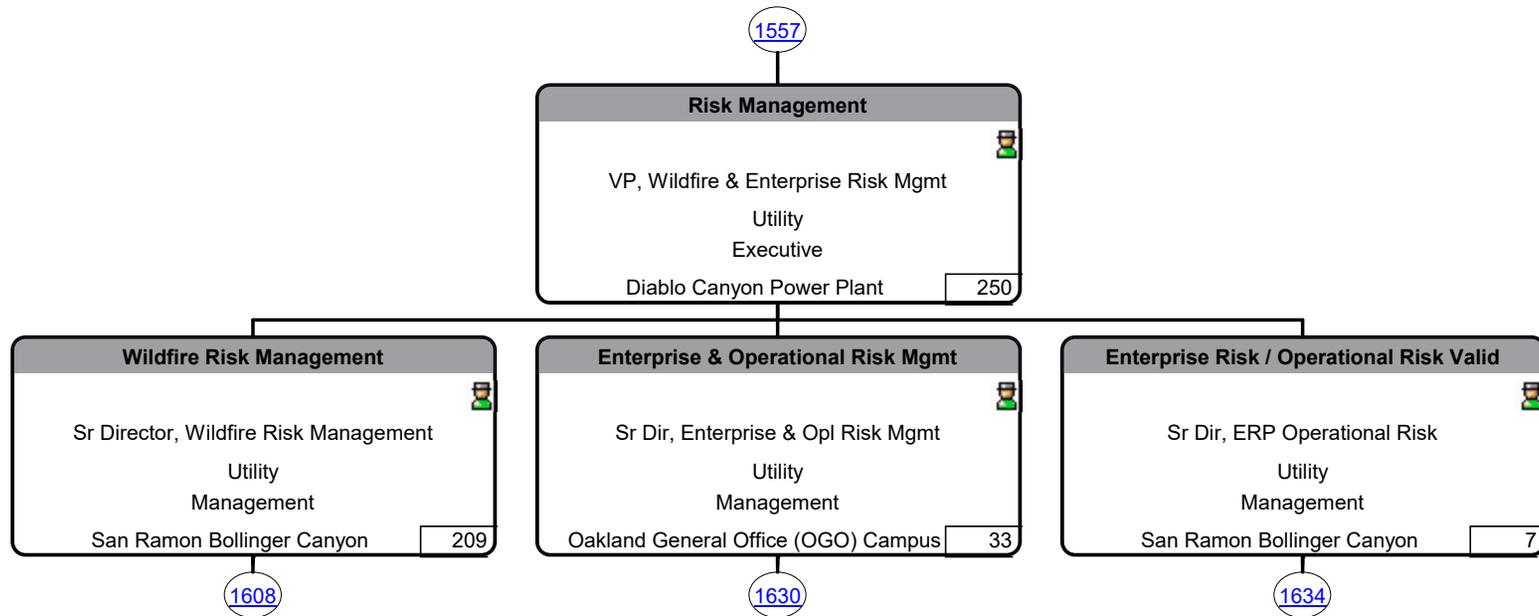


# Central Valley Regional Saftey - Gas

1603

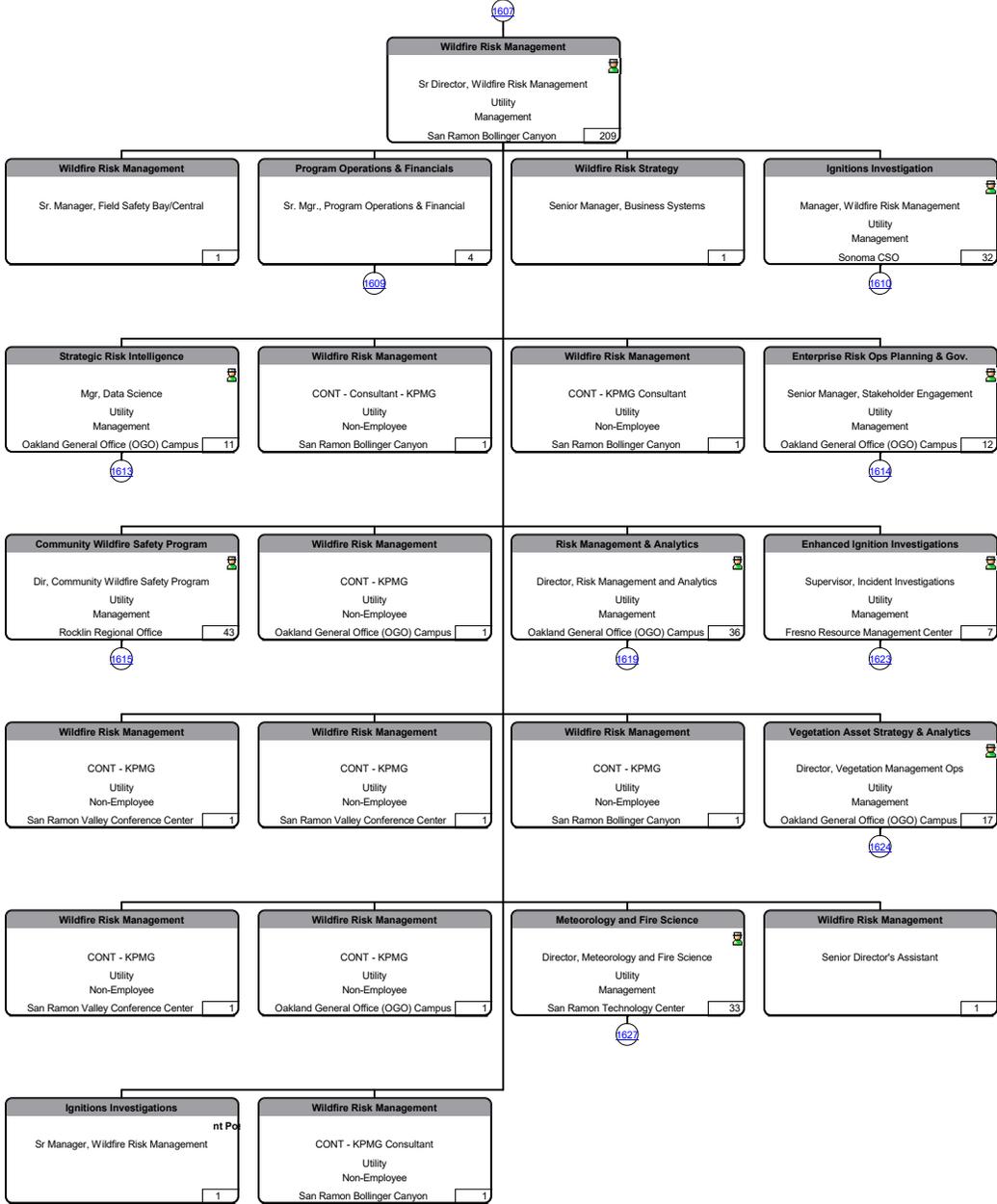


# Risk Management

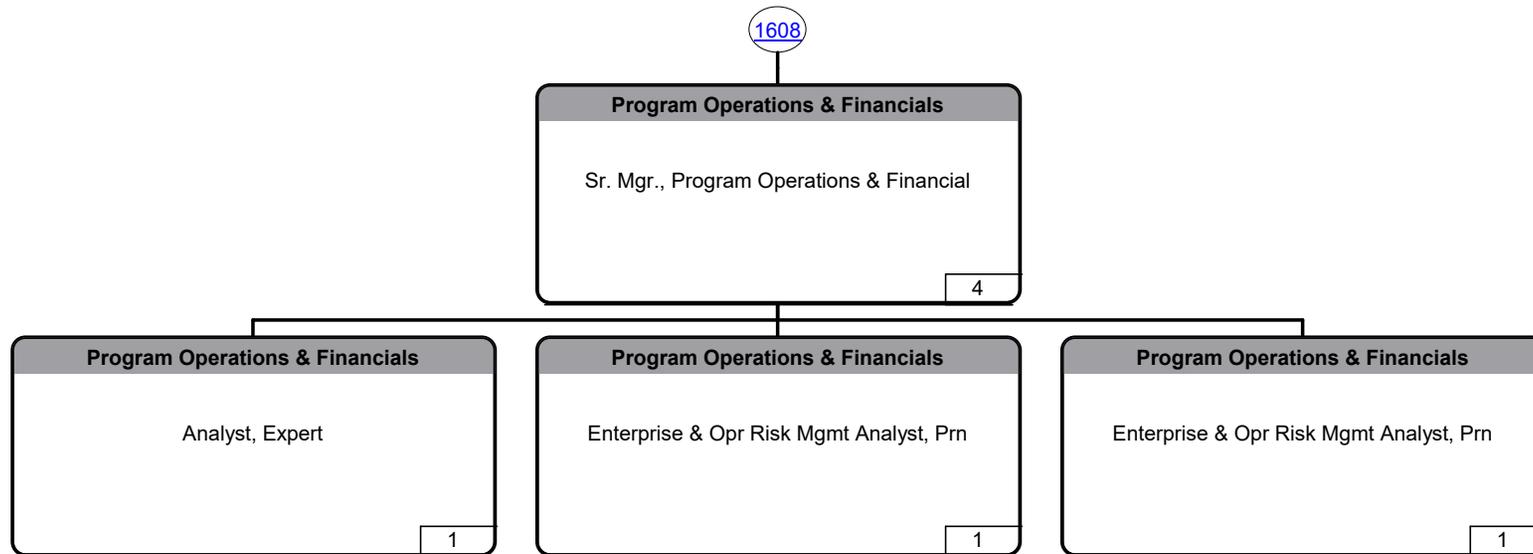


# Wildfire Risk Management

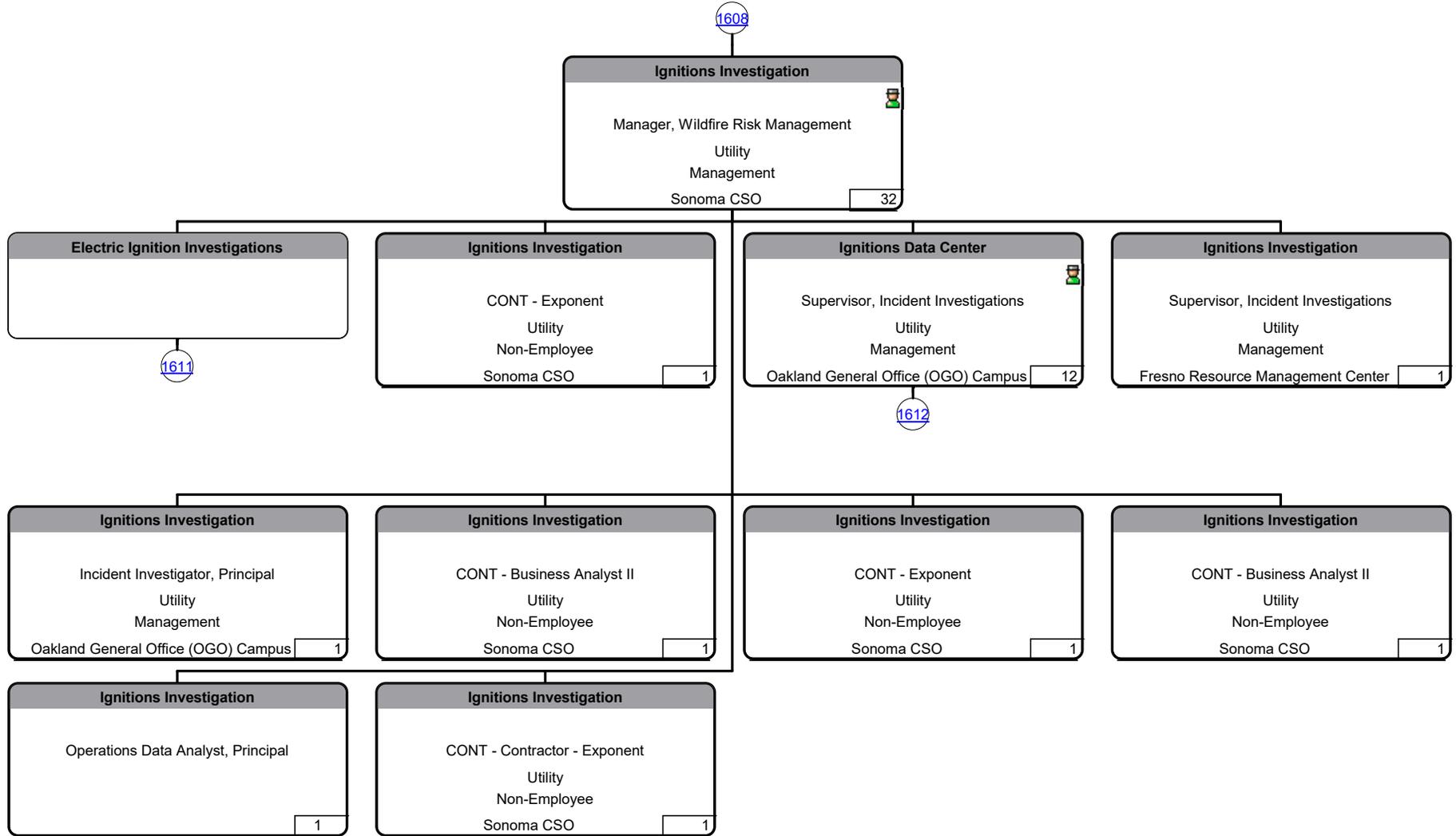
## Wildfire Risk Management



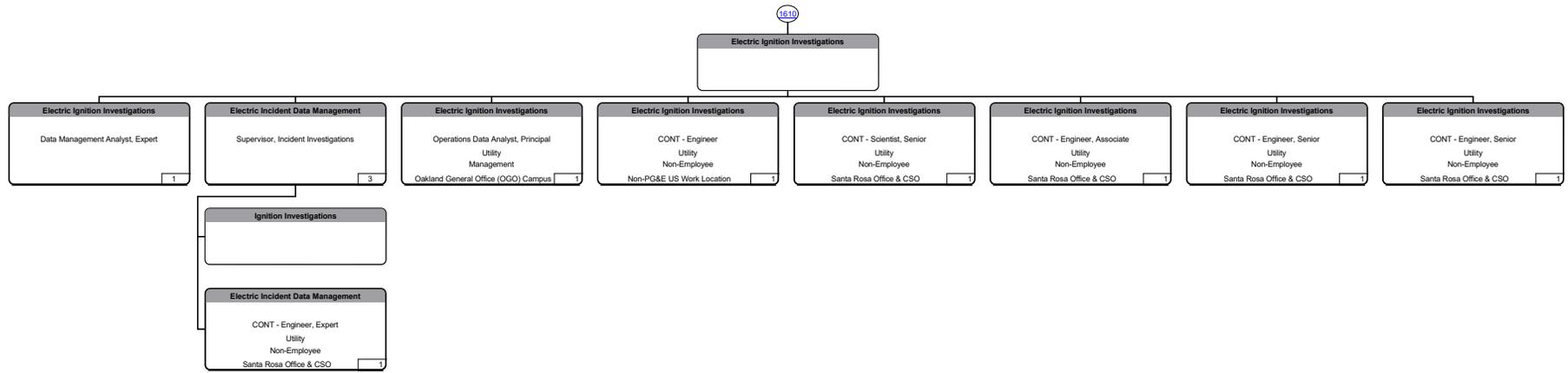
## Program Operations & Financials



# Ignitions Investigation

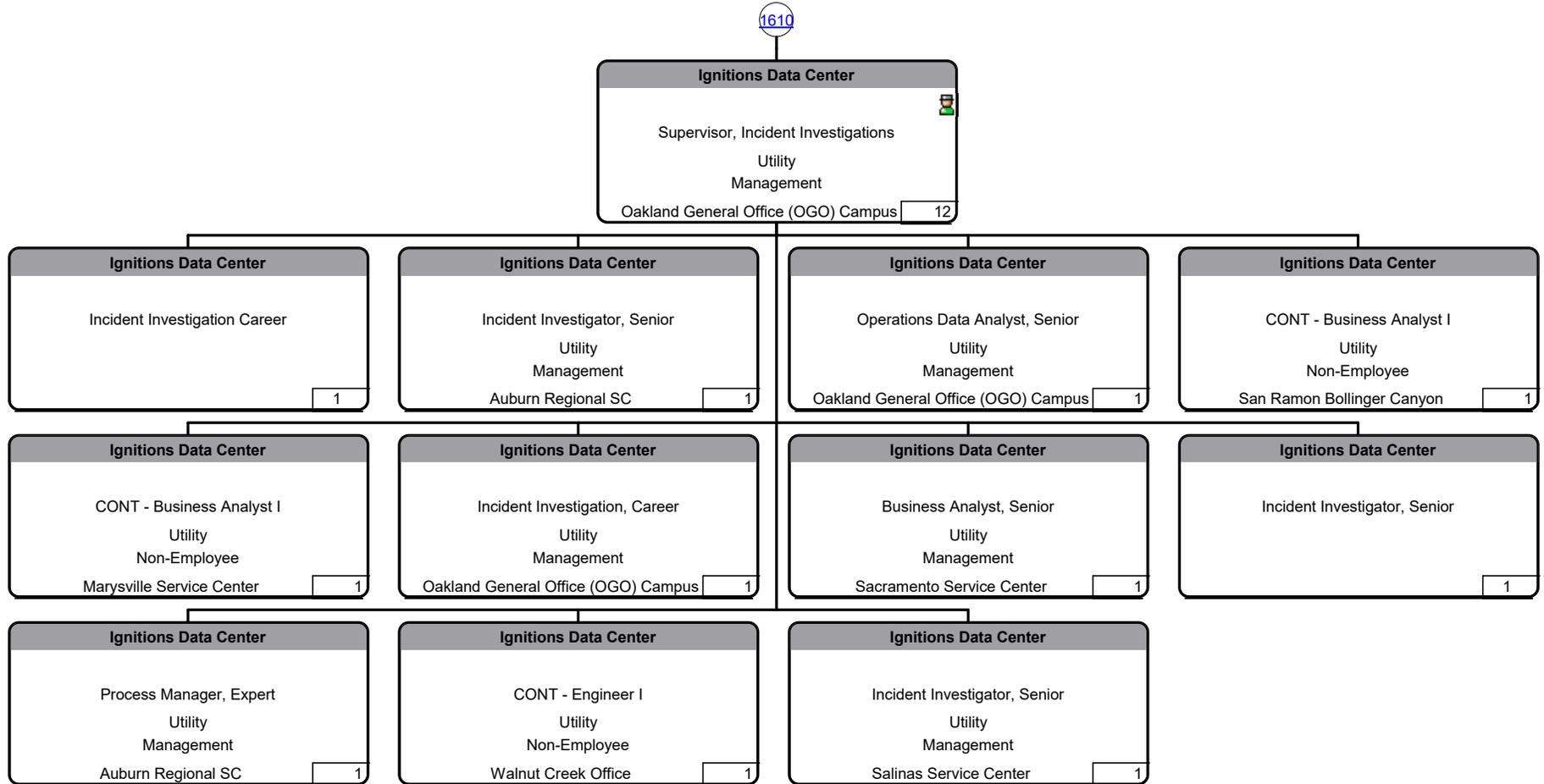


Electric Ignition Investigations

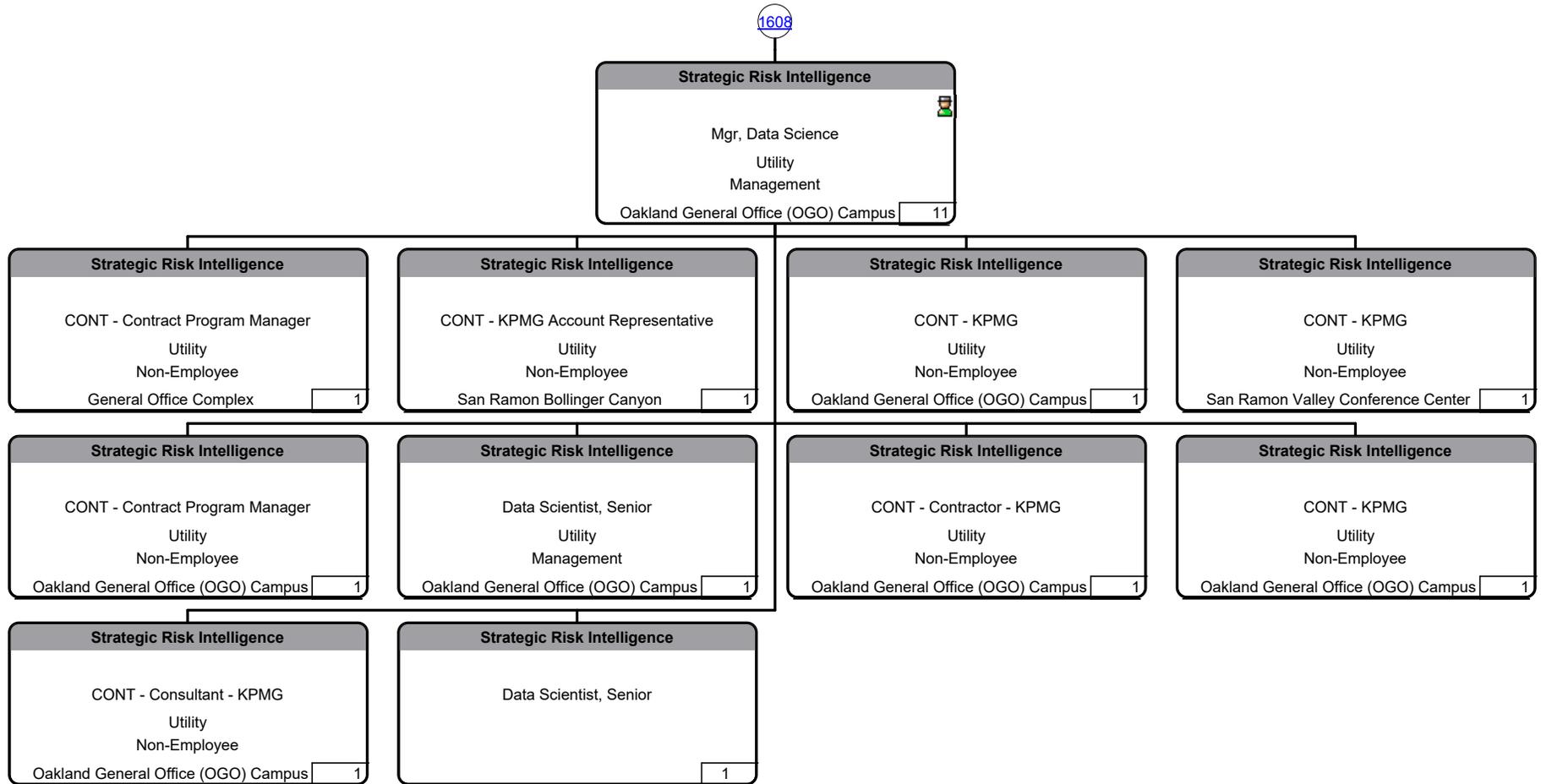


# Ignitions Data Center

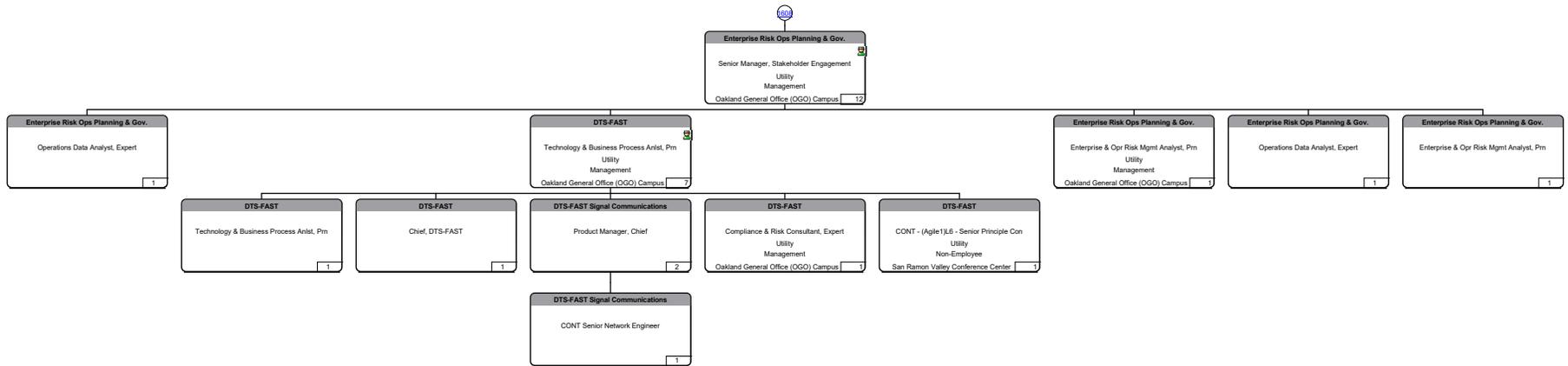
1610



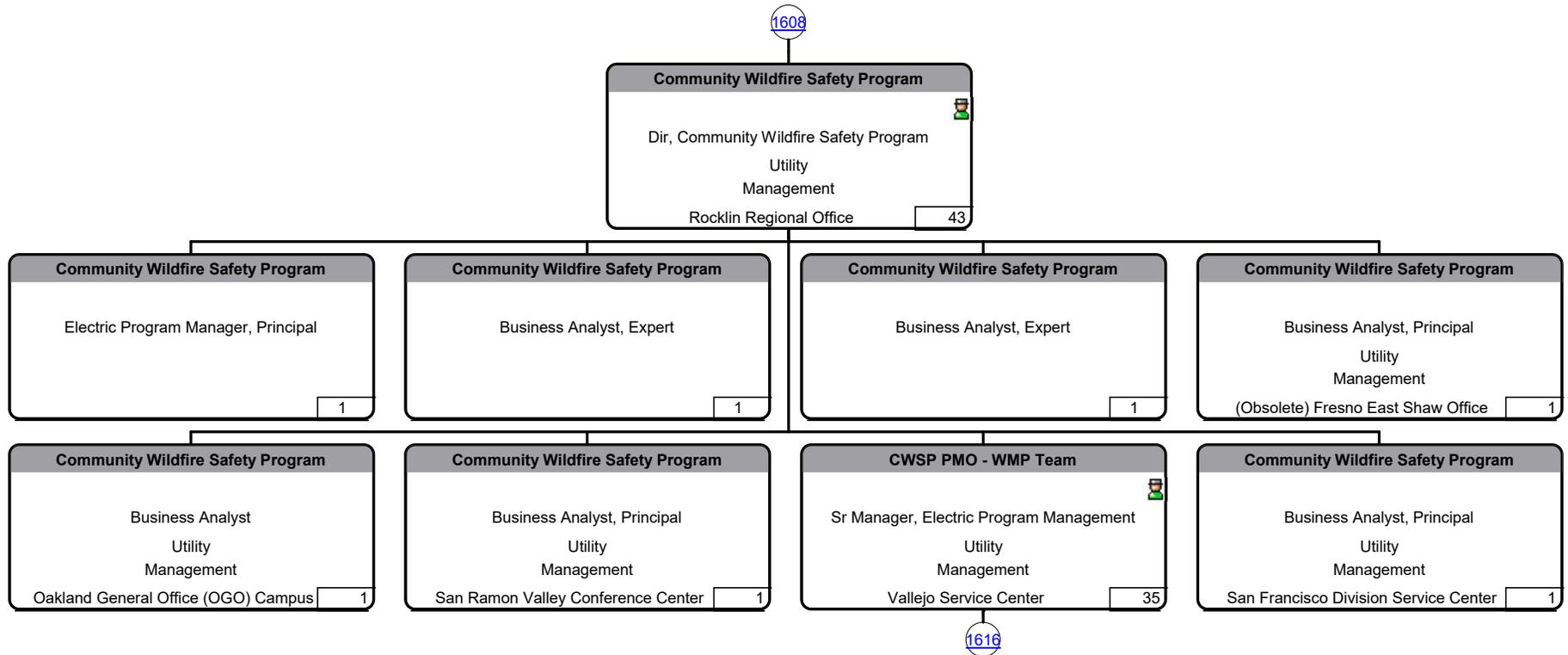
# Strategic Risk Intelligence



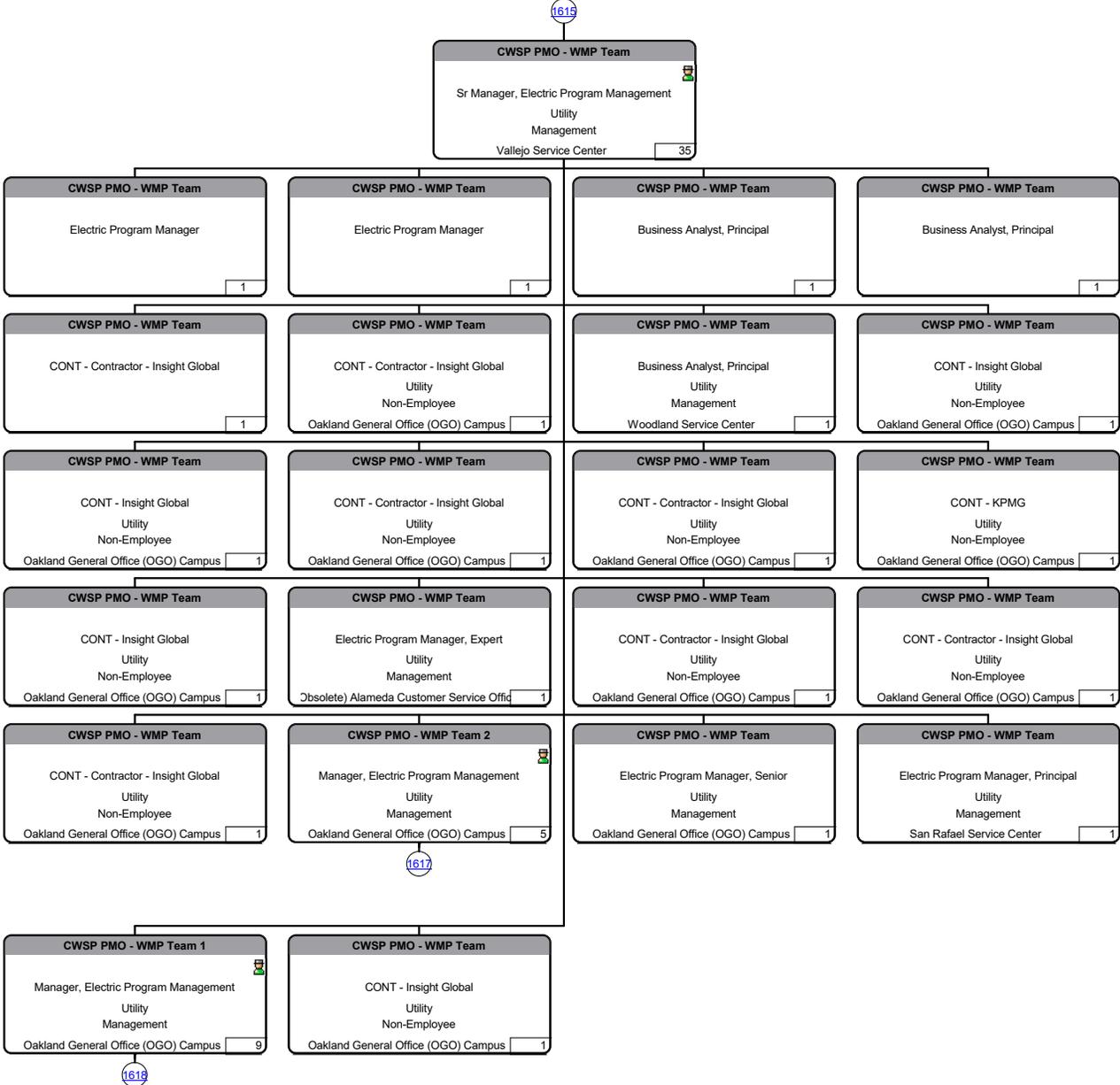
Enterprise Risk Ops Planning & Gov.



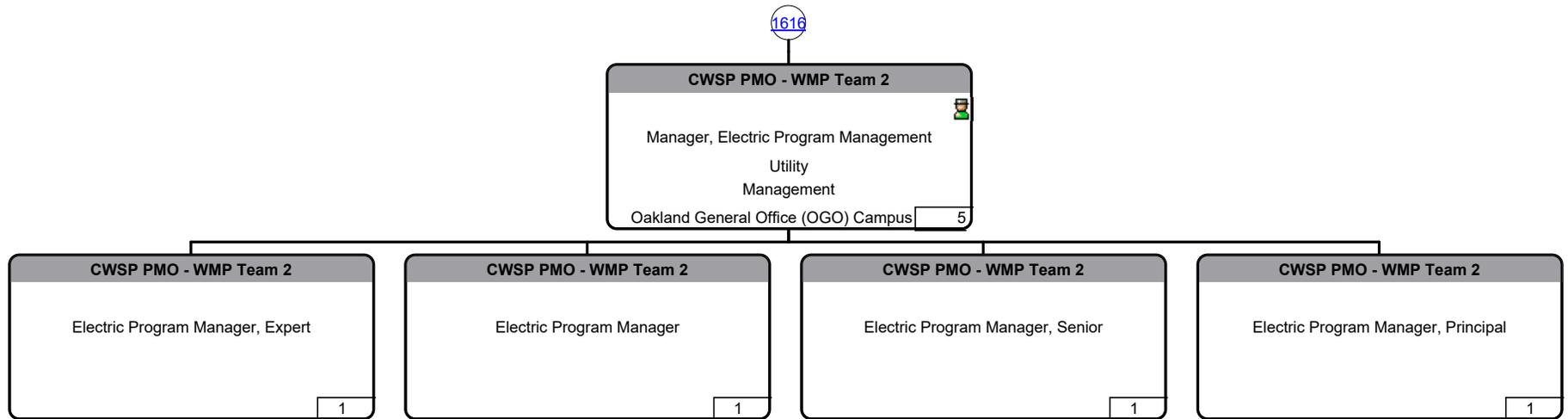
## Community Wildfire Safety Program



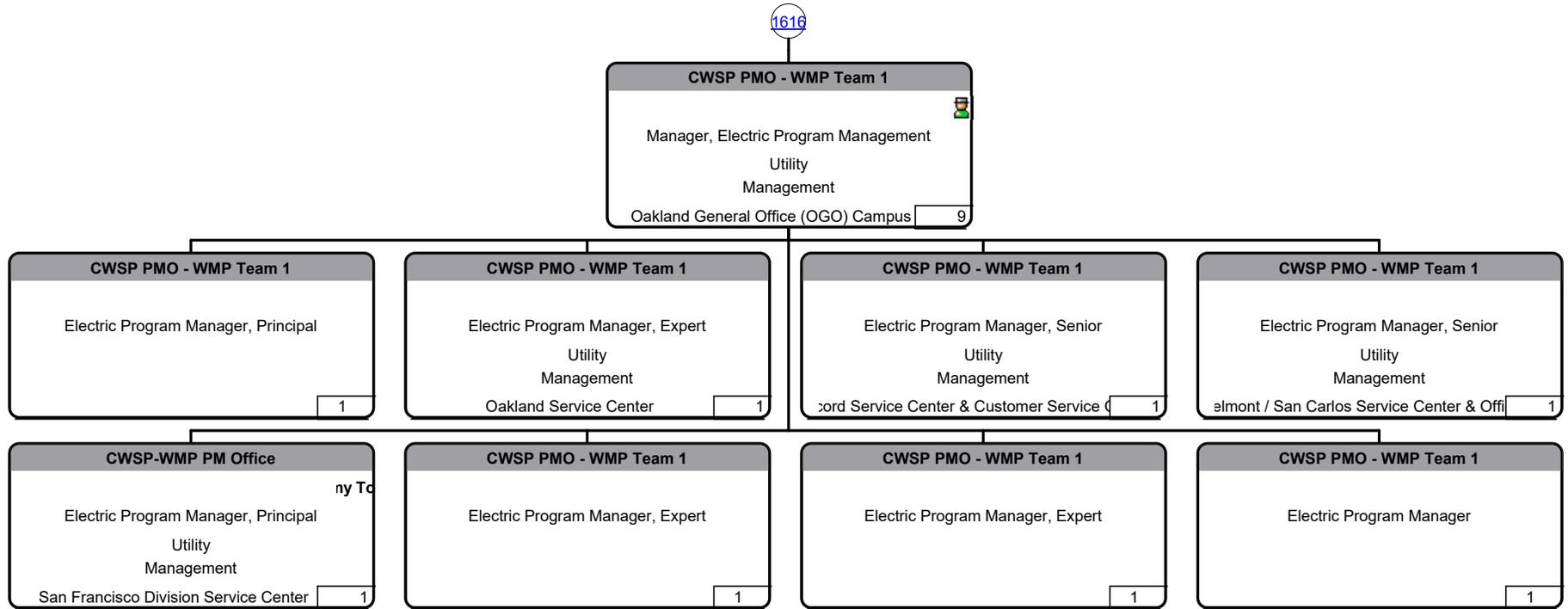
CWSP PMO - WMP Team  
**CWSP PMO - WMP Team**



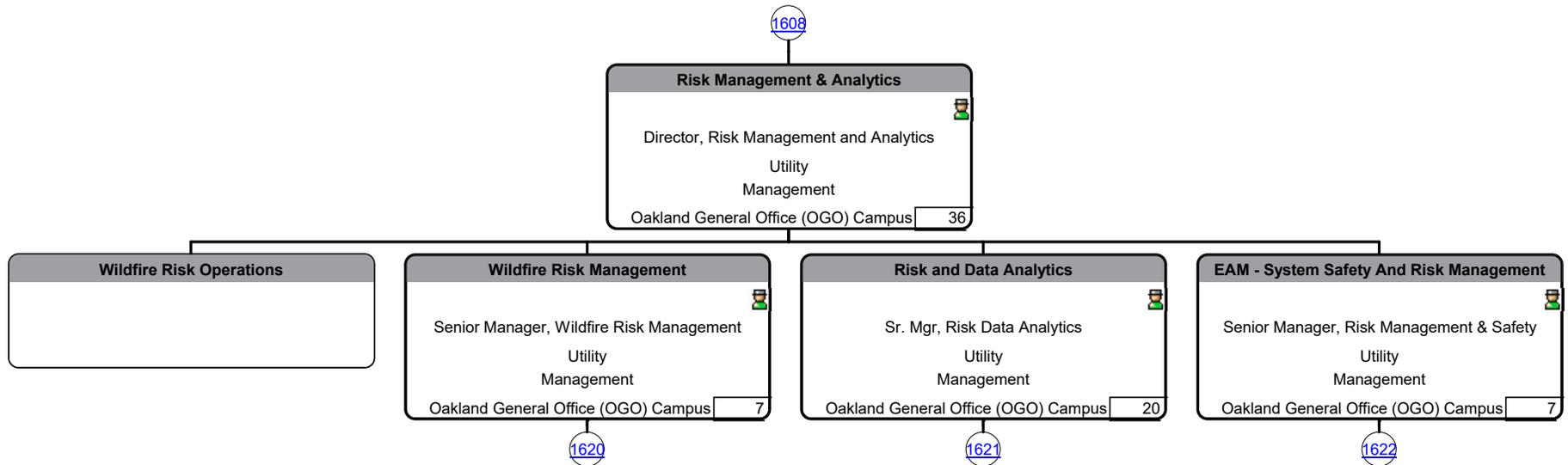
### CWSP PMO - WMP Team 2



### CWSP PMO - WMP Team 1

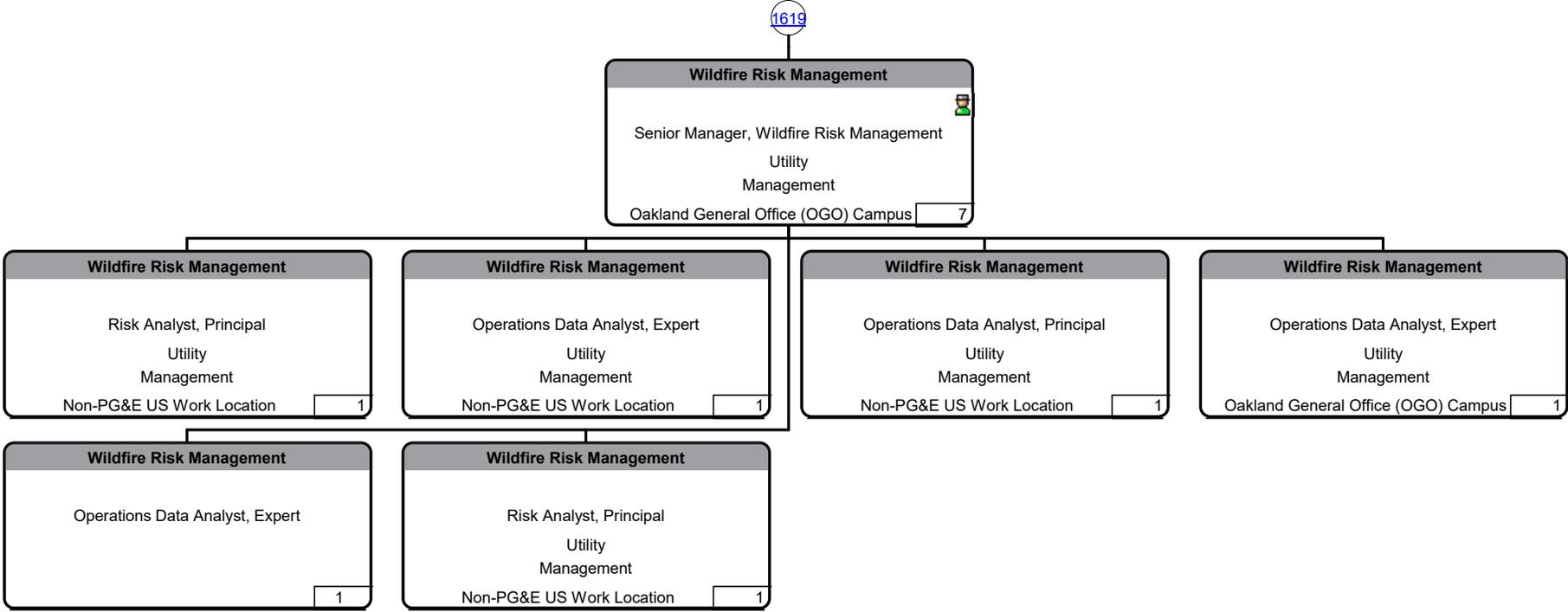


### Risk Management & Analytics



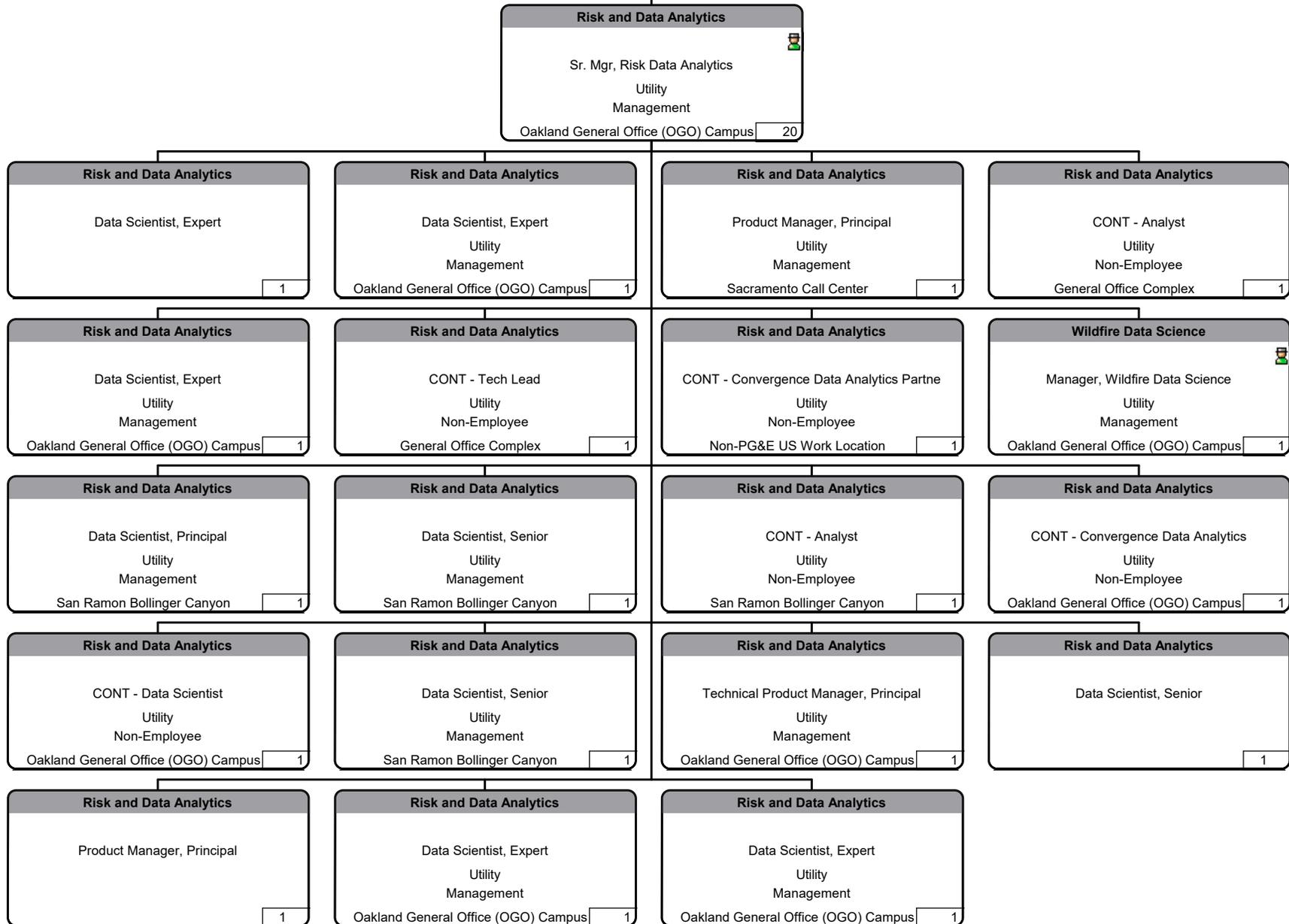
# Wildfire Risk Management

1619

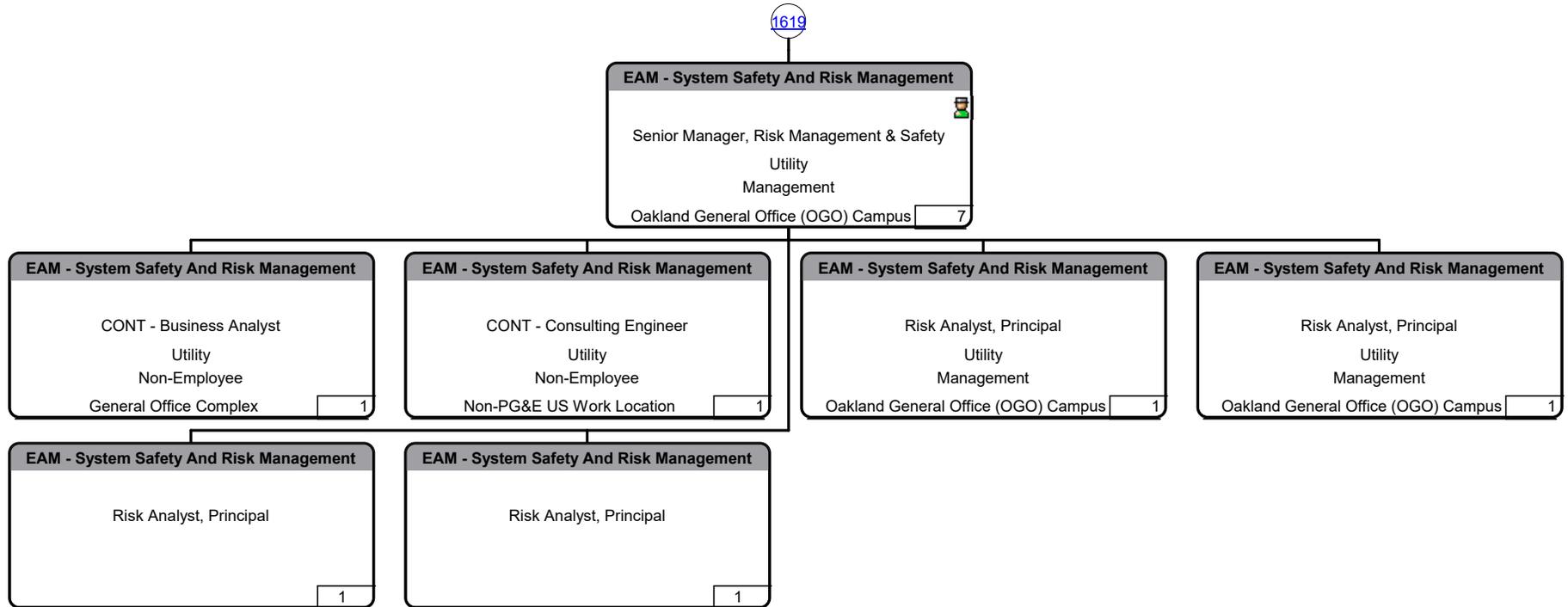


# Risk and Data Analytics

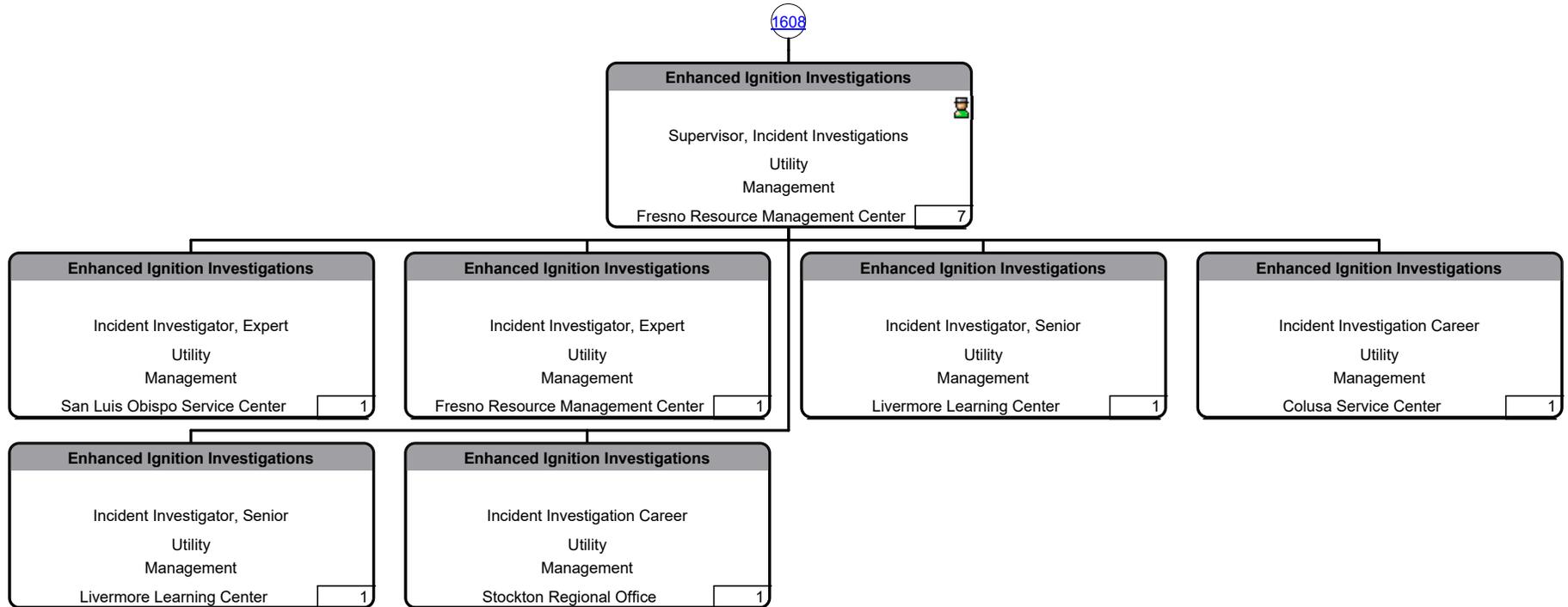
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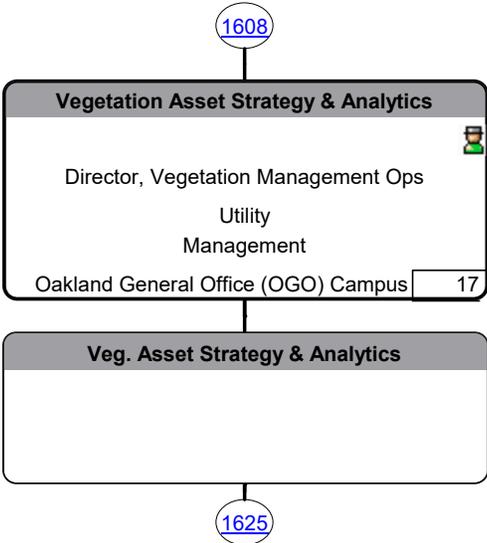
### EAM - System Safety And Risk Management



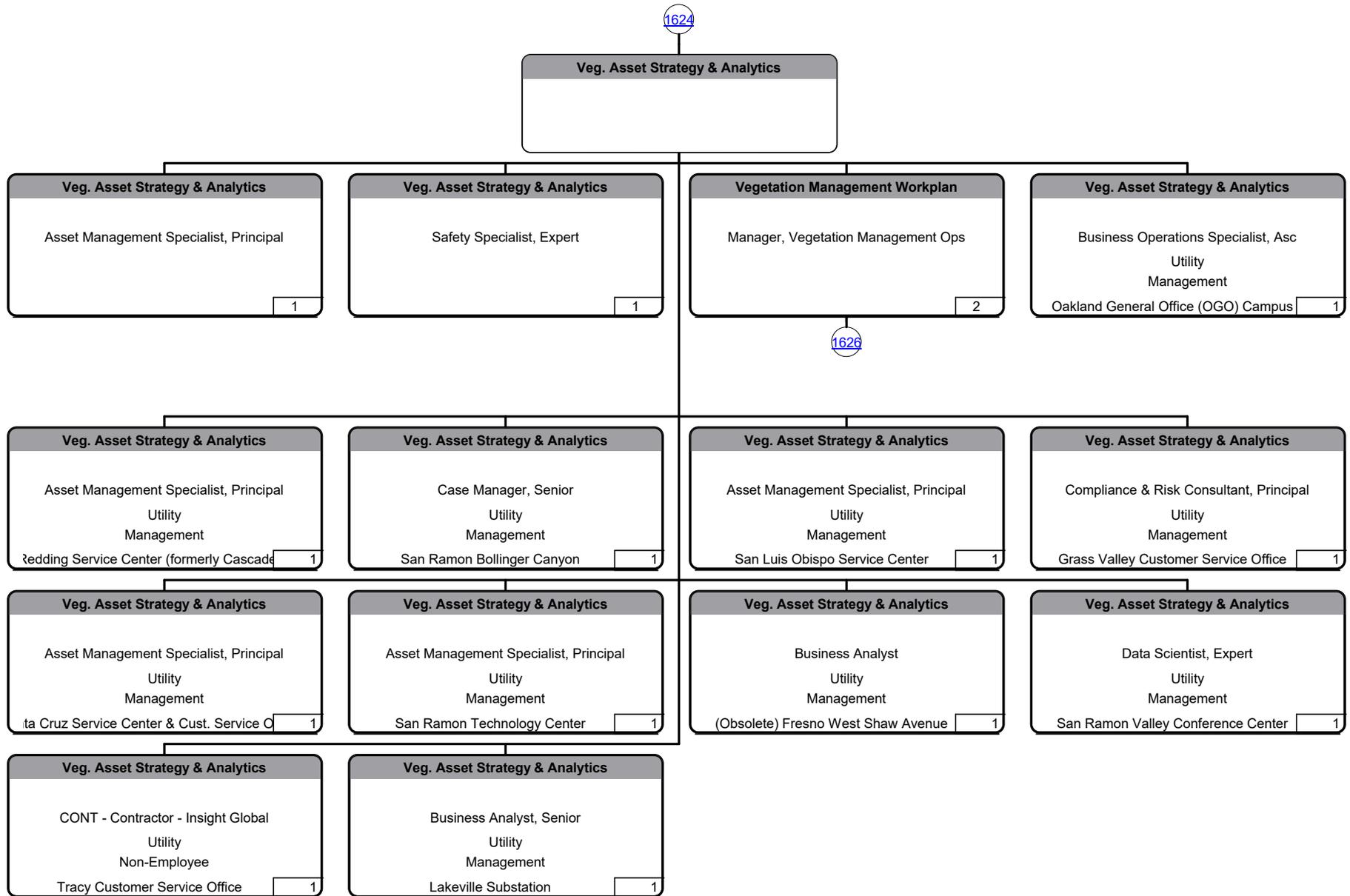
# Enhanced Ignition Investigations



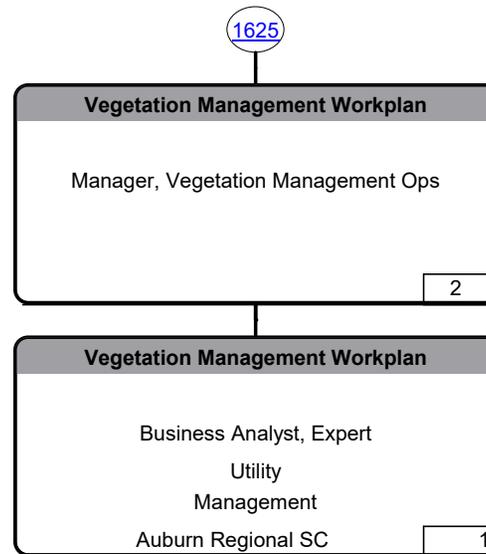
# Vegetation Asset Strategy & Analytics



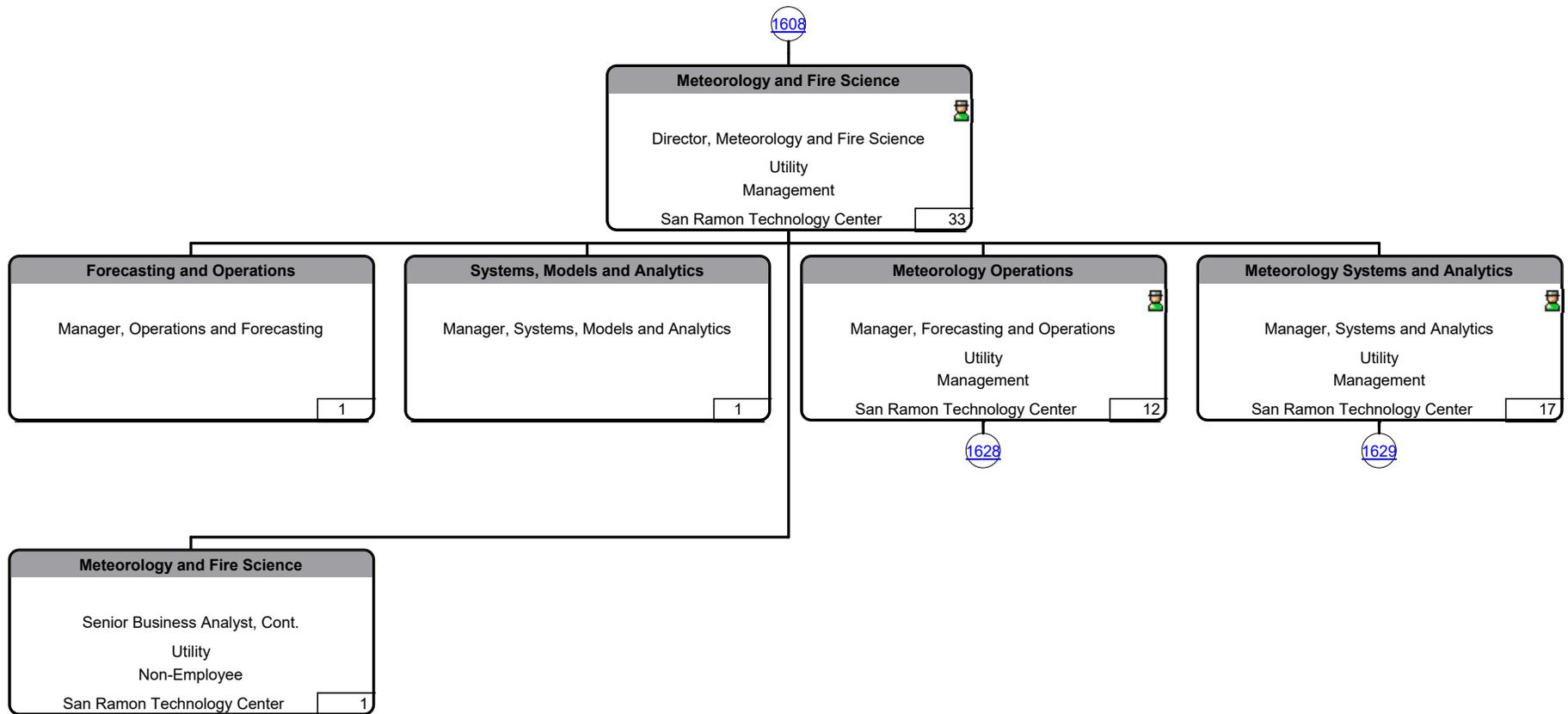
# Veg. Asset Strategy & Analytics



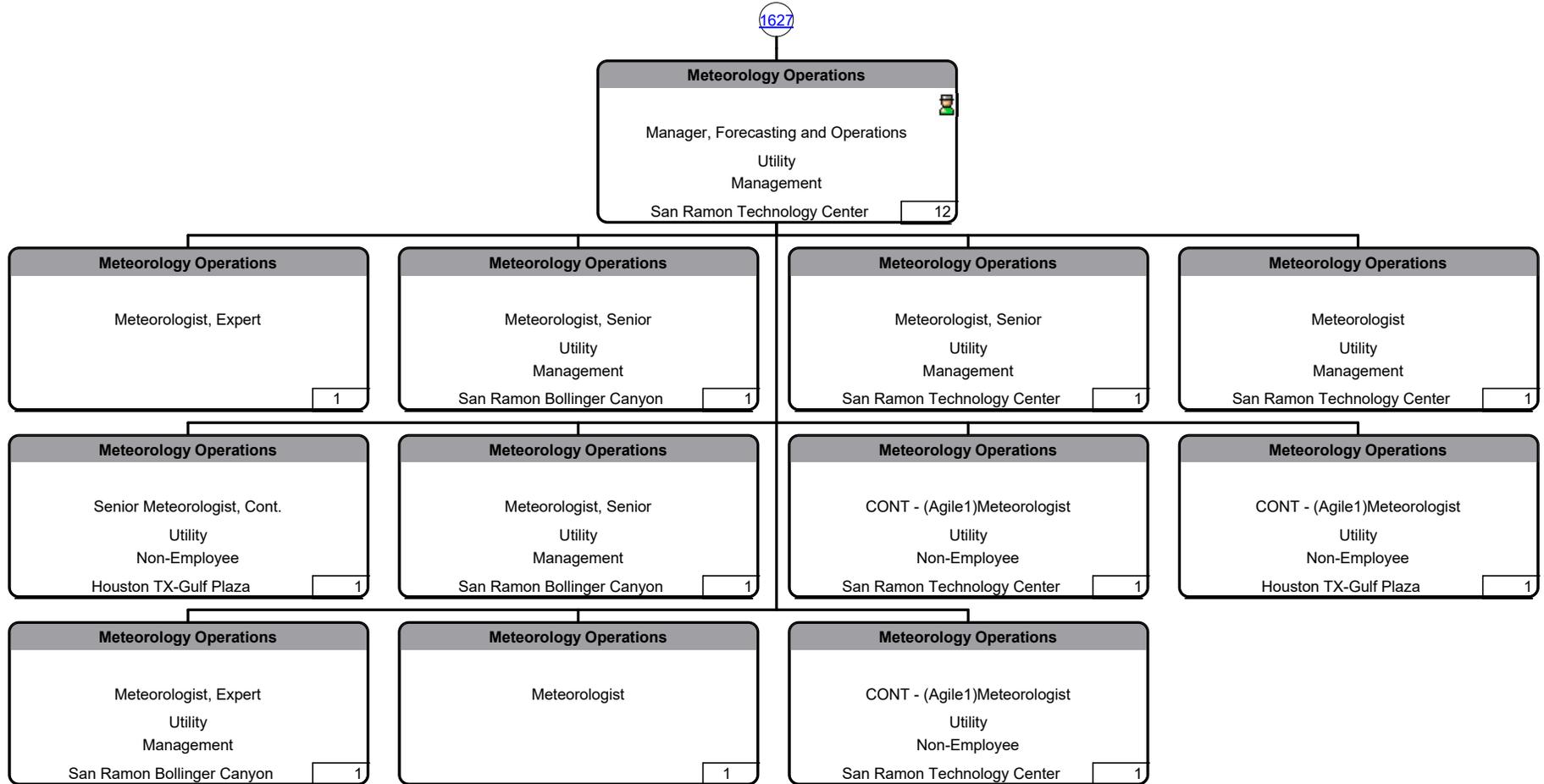
## Vegetation Management Workplan



# Meteorology and Fire Science

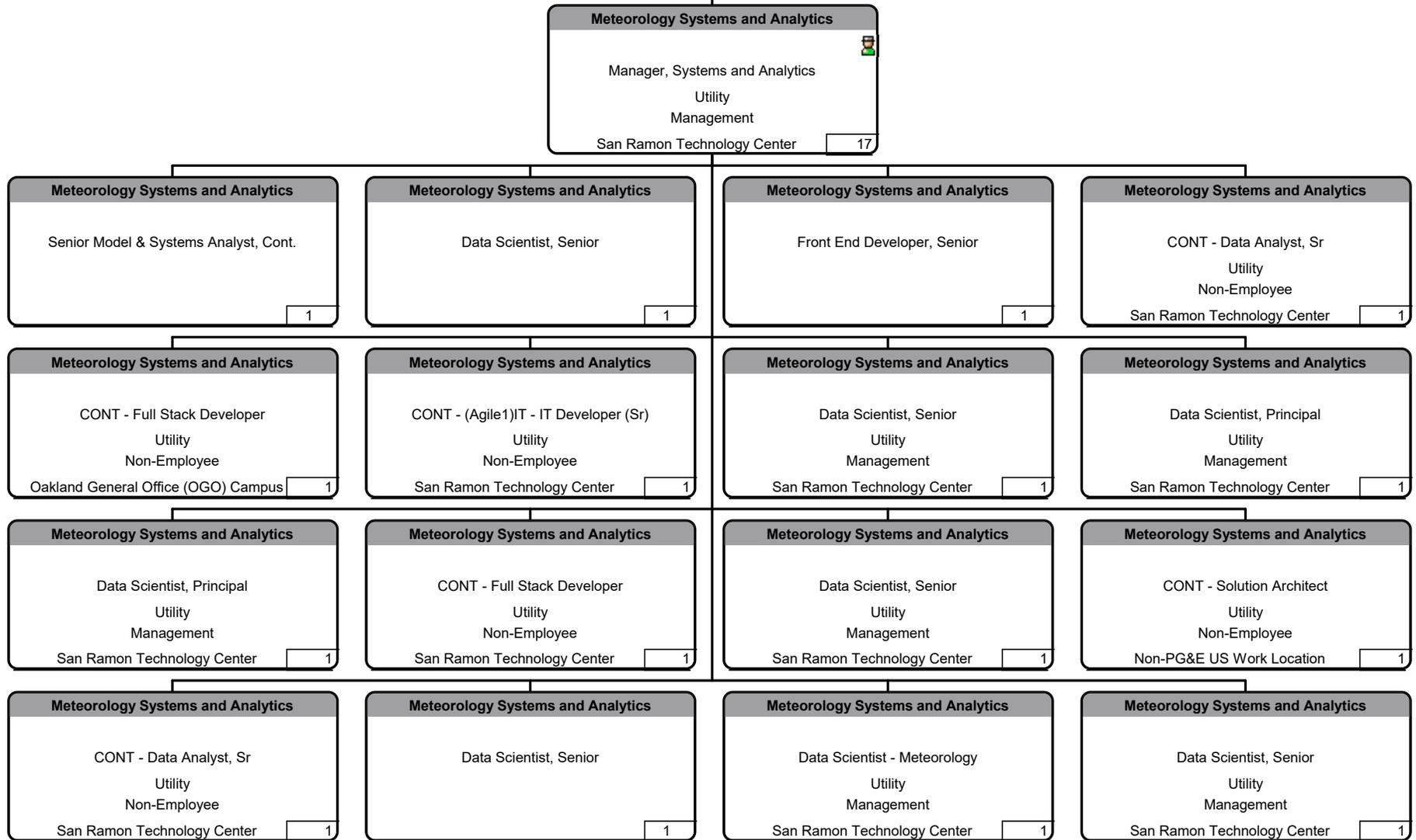


# Meteorology Operations

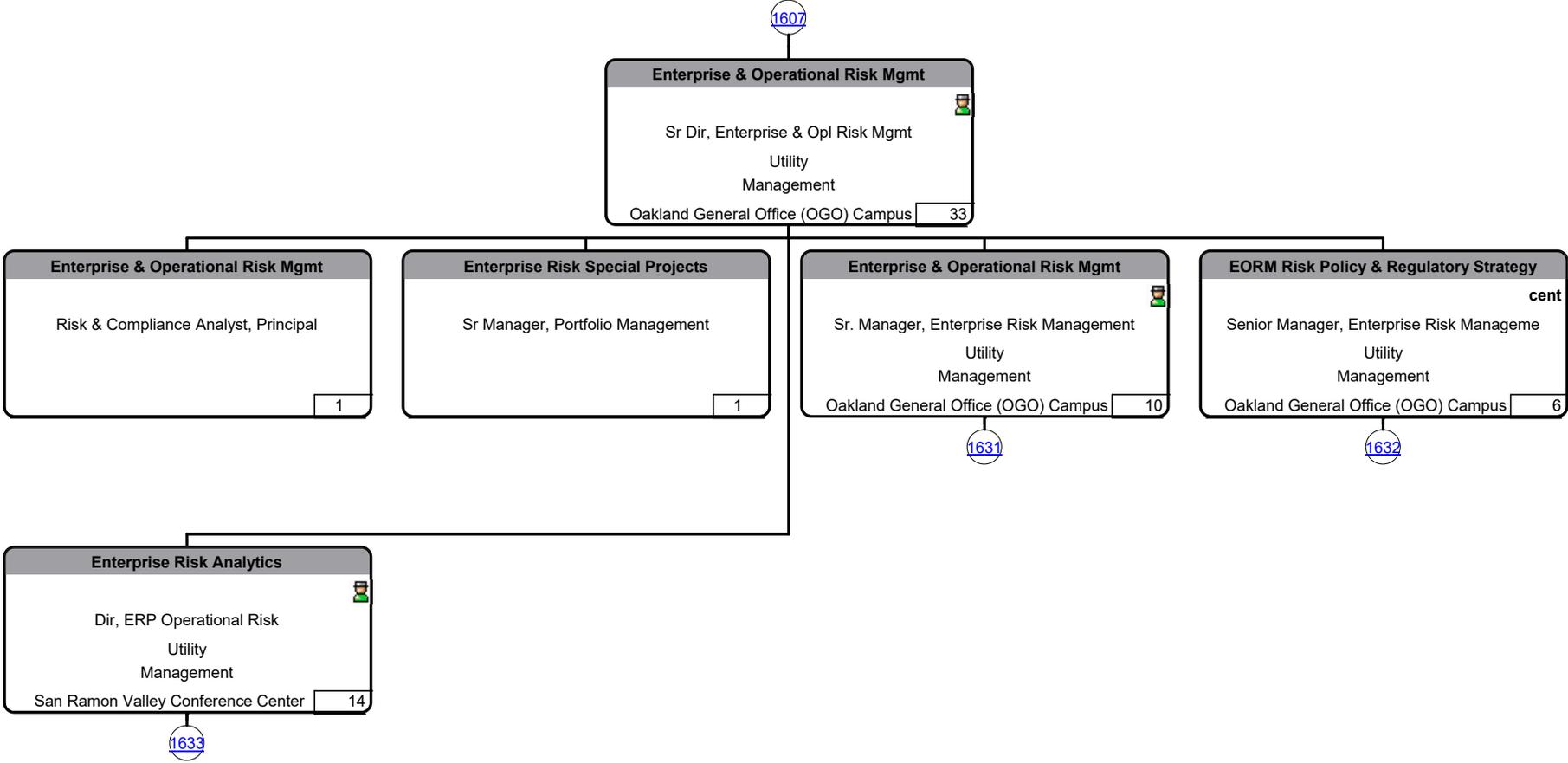


# Meteorology Systems and Analytics

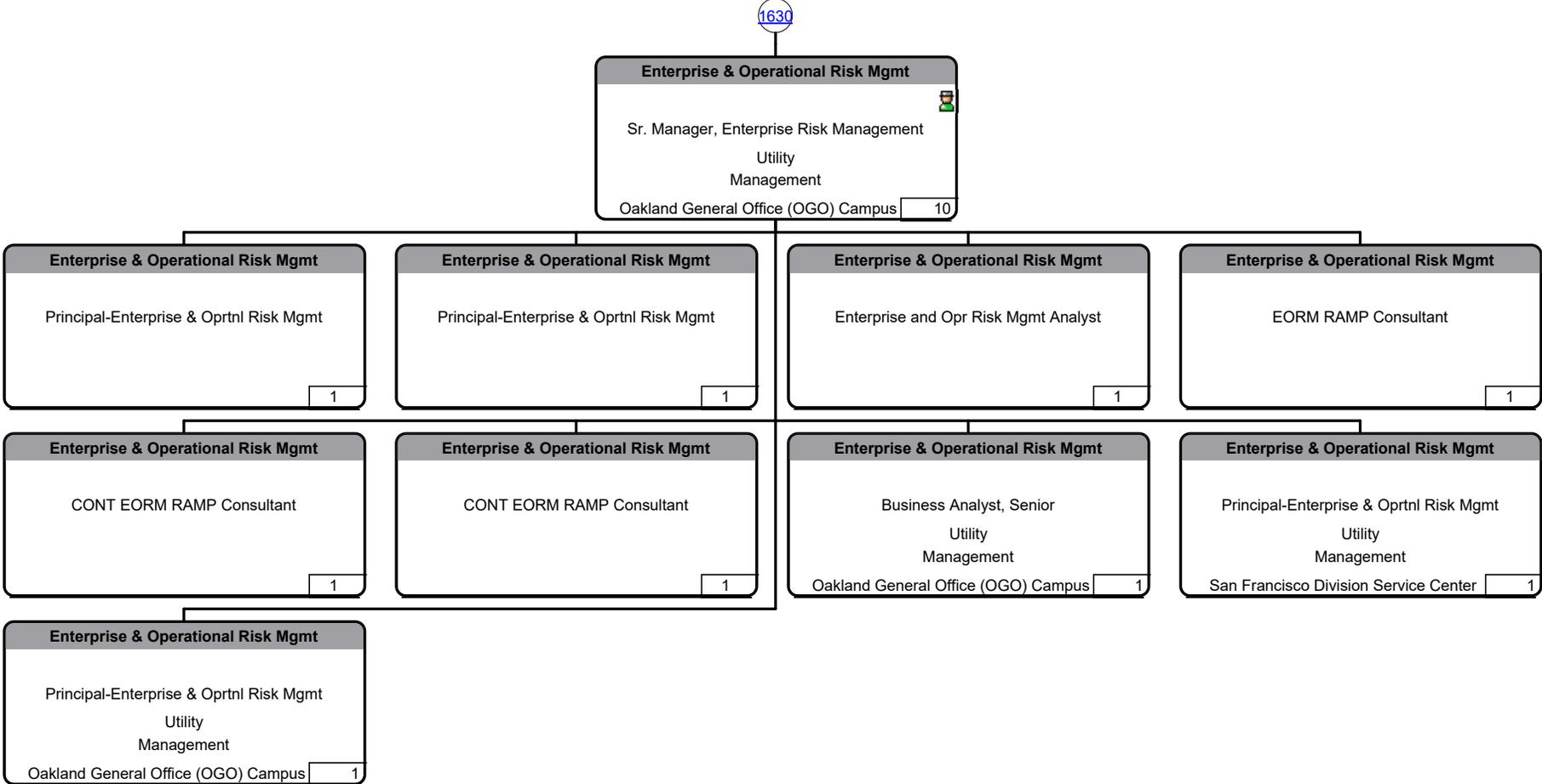
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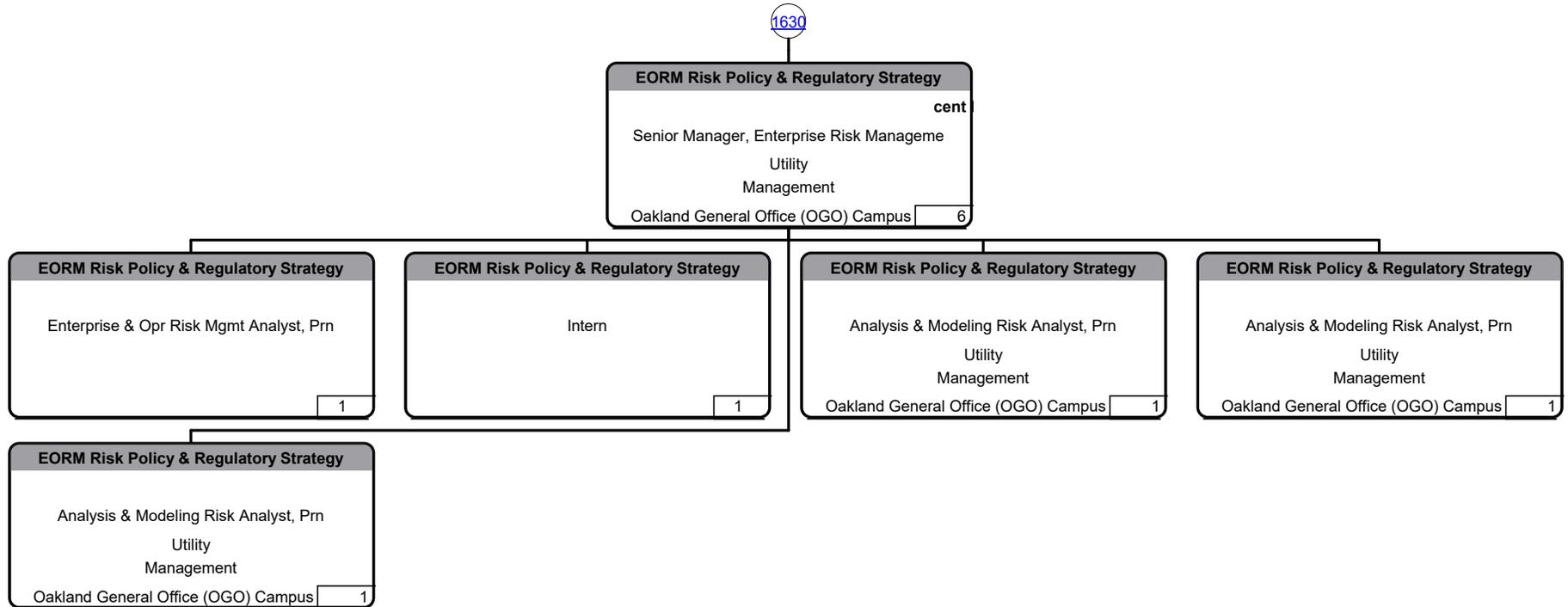
# Enterprise & Operational Risk Mgmt



### Enterprise & Operational Risk Mgmt



## EORM Risk Policy & Regulatory Strategy

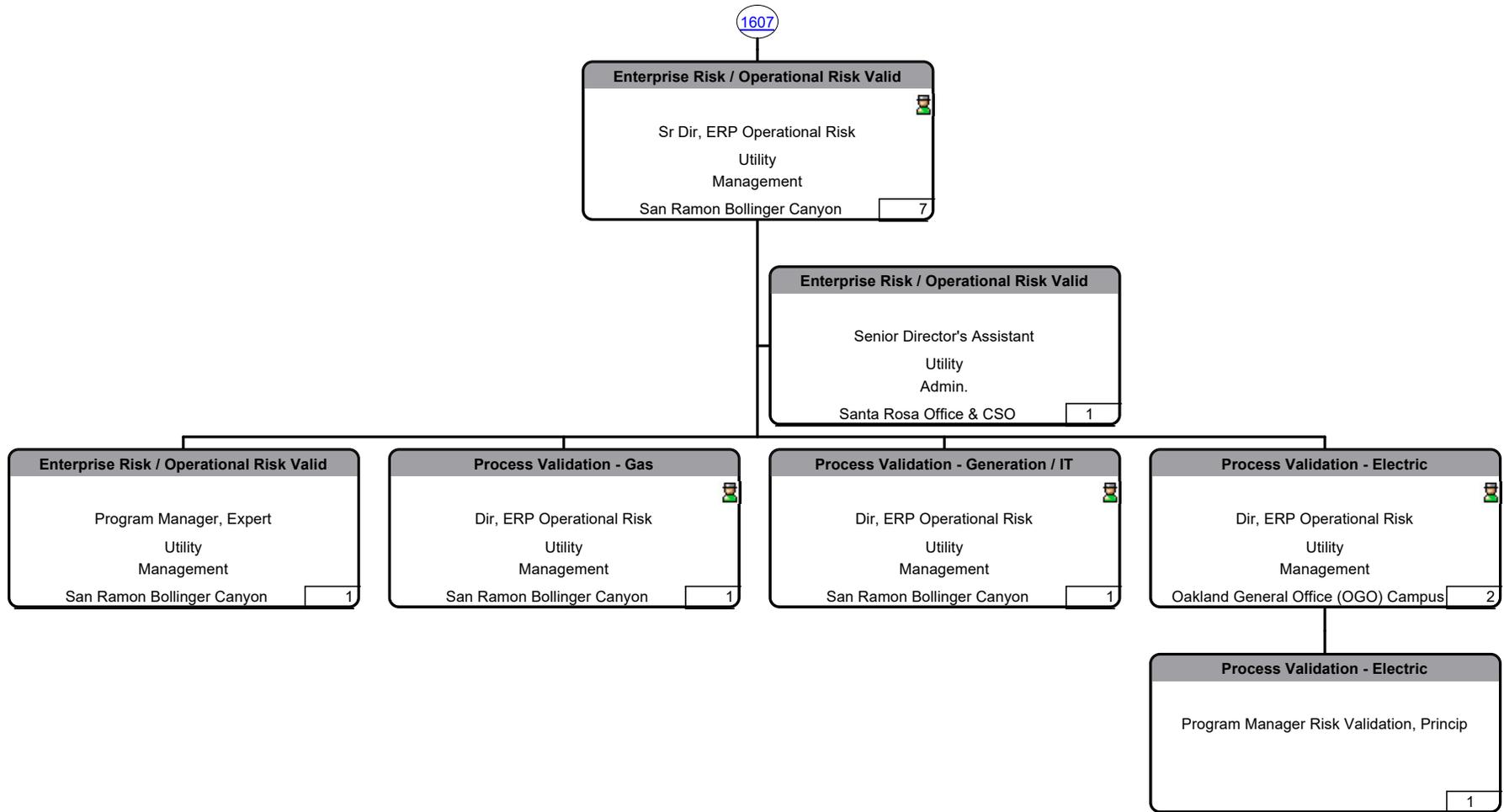


# Enterprise Risk Analytics

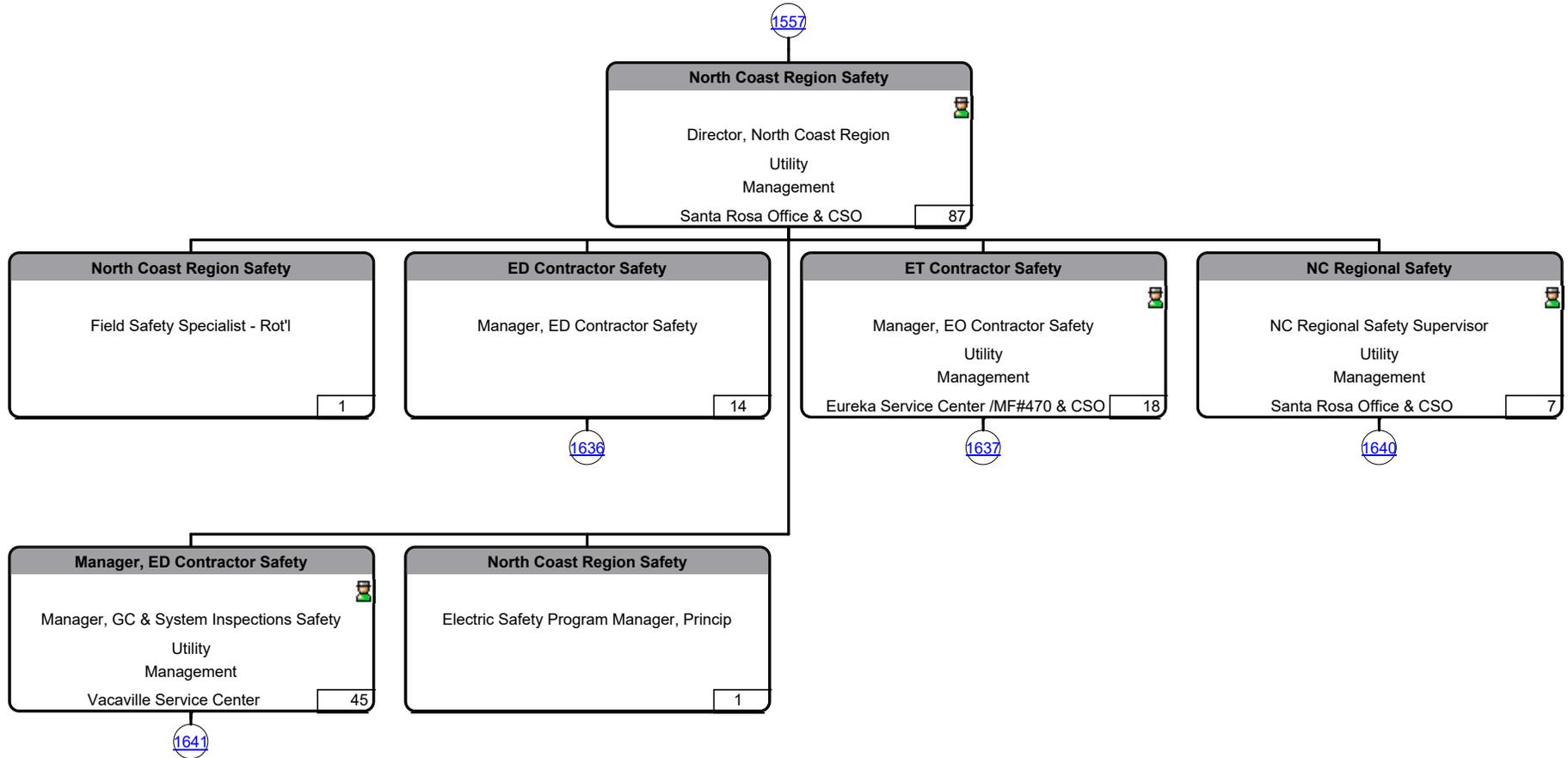
## Enterprise Risk Analytics



### Enterprise Risk / Operational Risk Valid

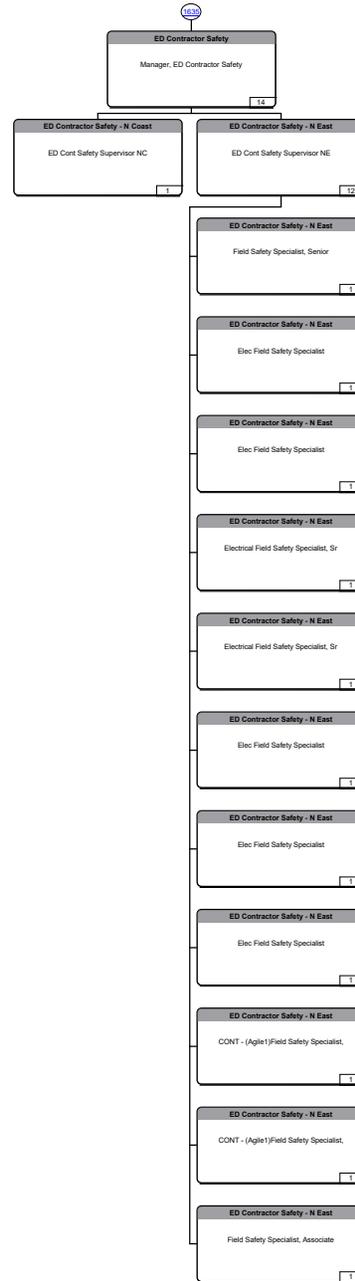


# North Coast Region Safety

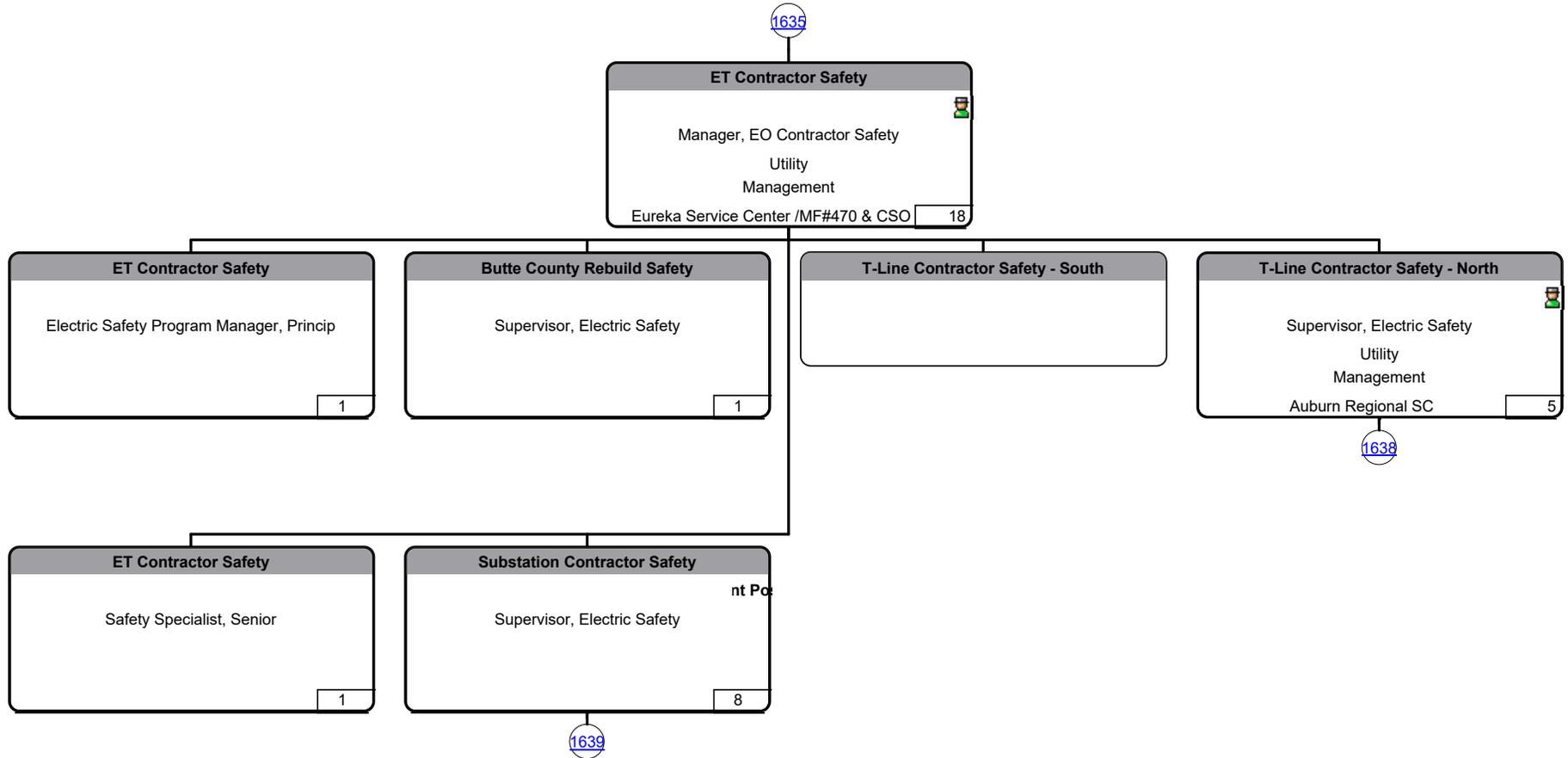


# ED Contractor Safety

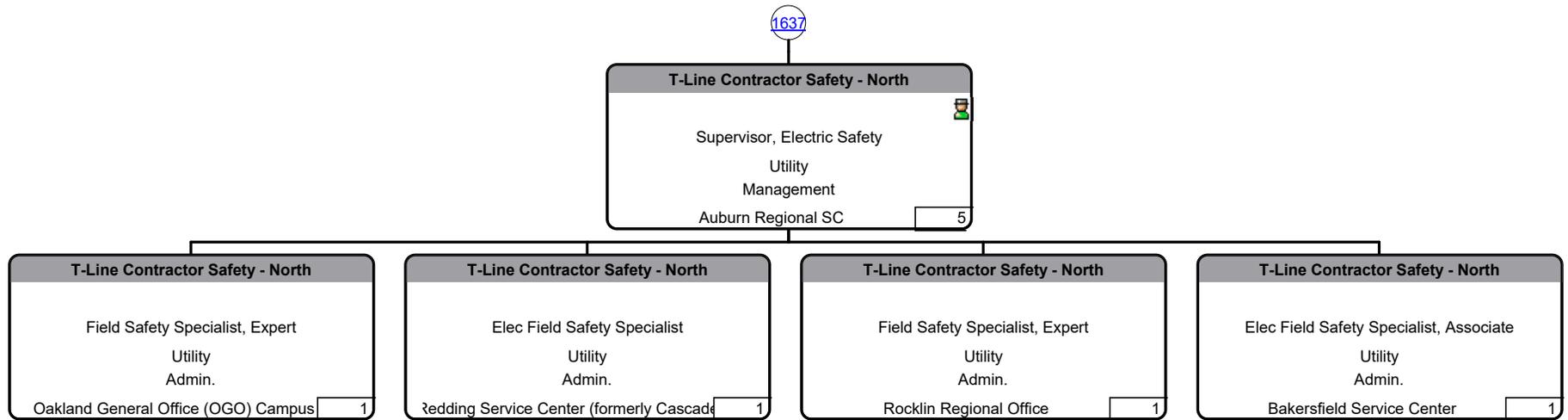
## ED Contractor Safety



# ET Contractor Safety

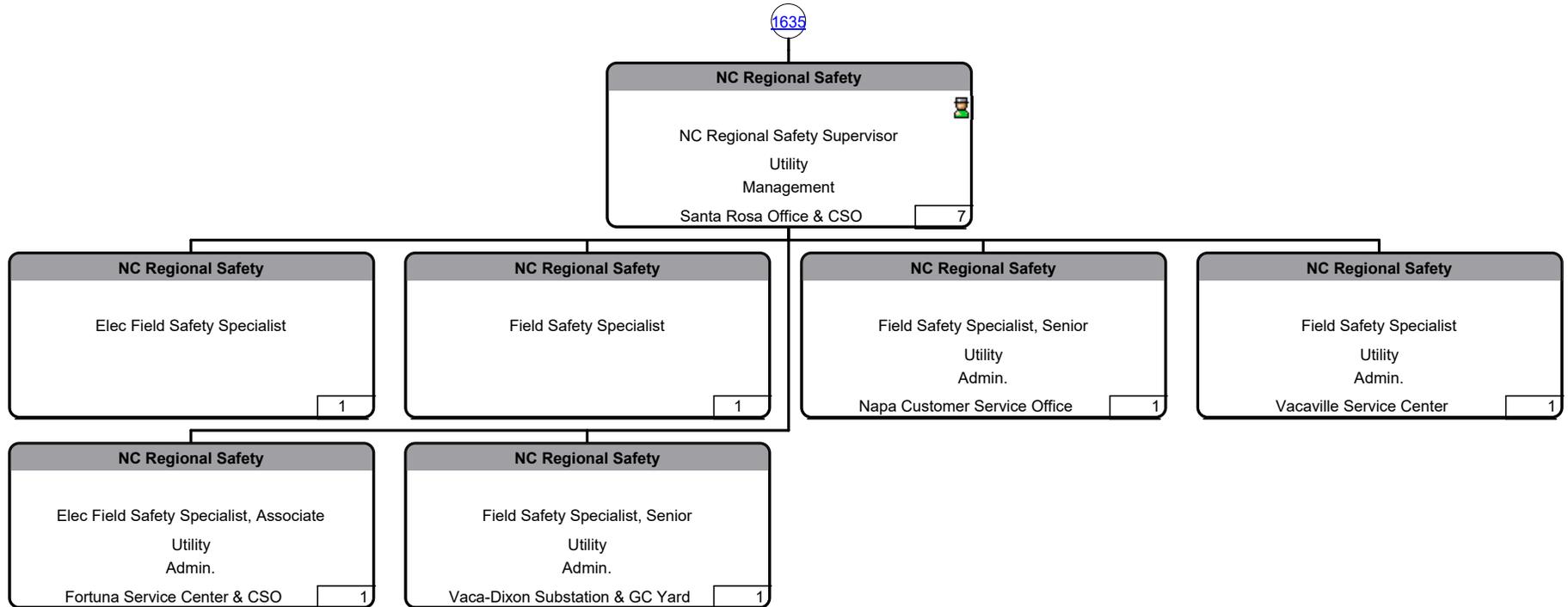


### T-Line Contractor Safety - North

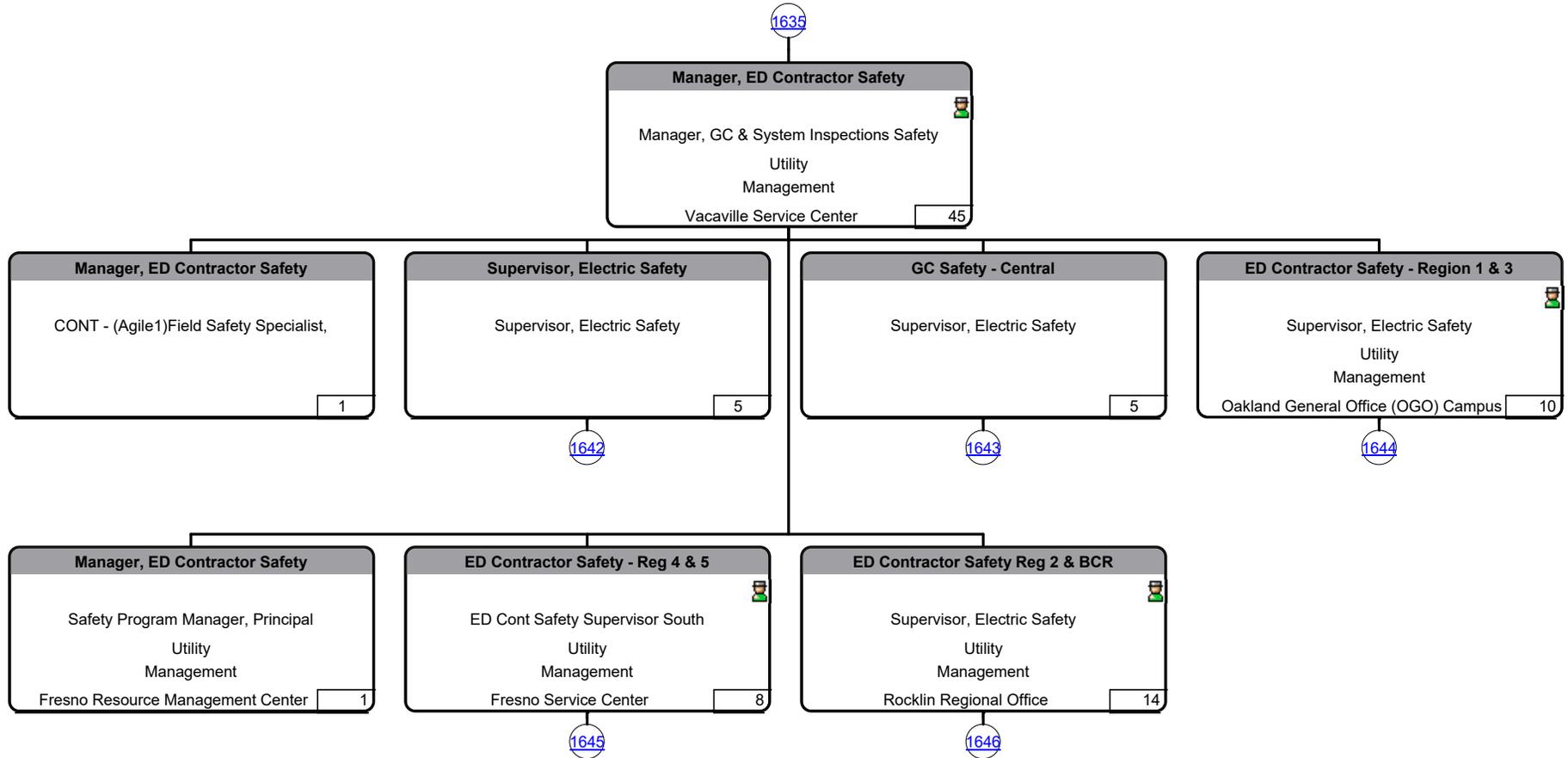




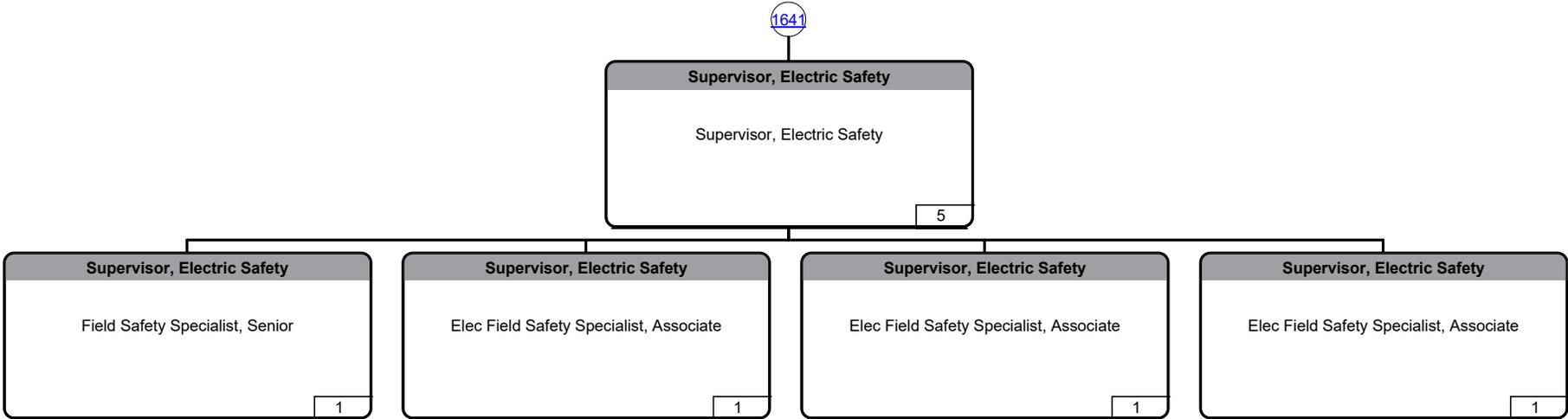
# NC Regional Safety



### Manager, ED Contractor Safety

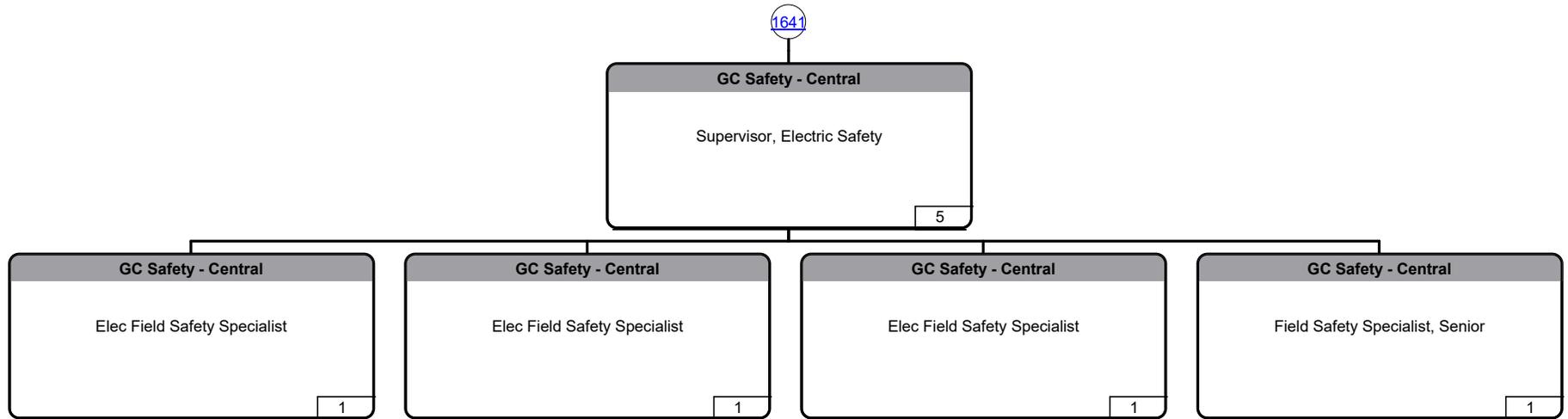


### Supervisor, Electric Safety

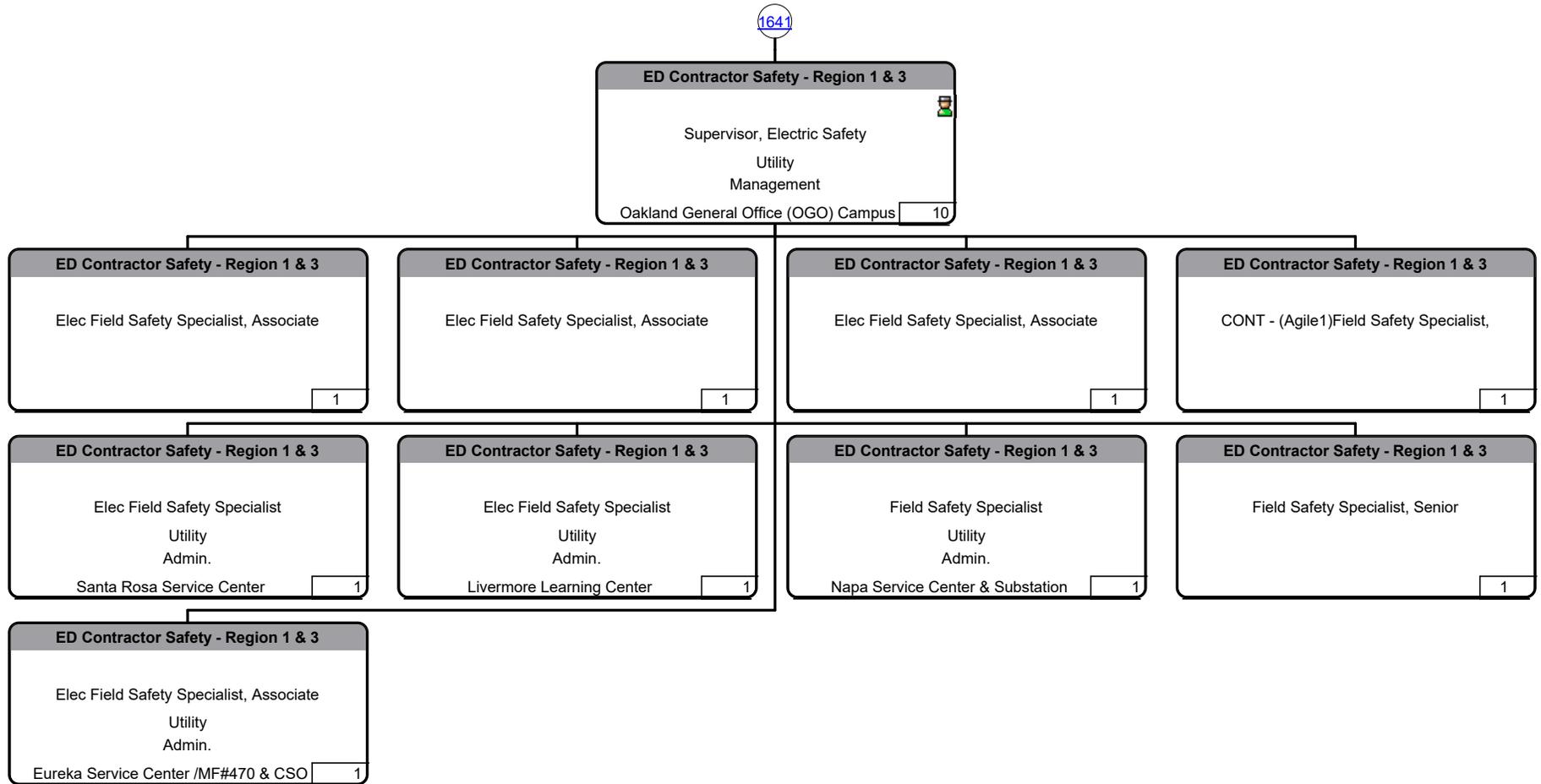


### GC Safety - Central

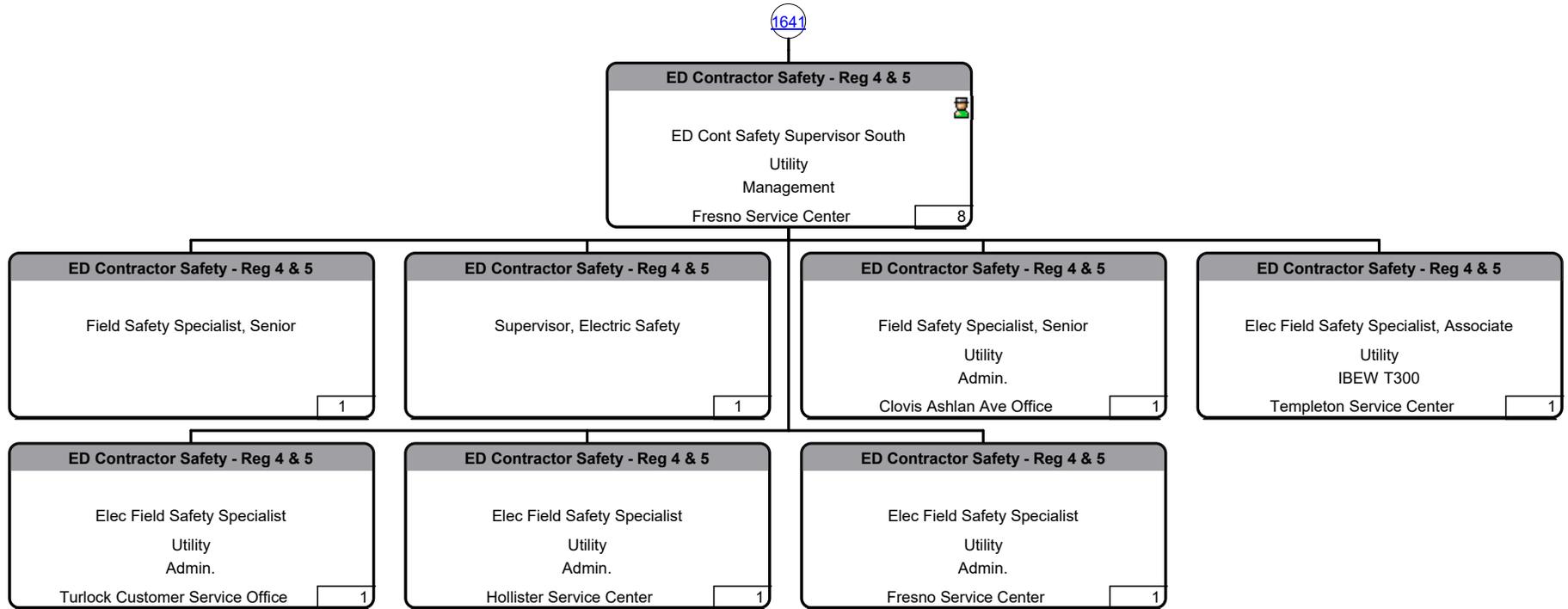
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## ED Contractor Safety - Region 1 & 3

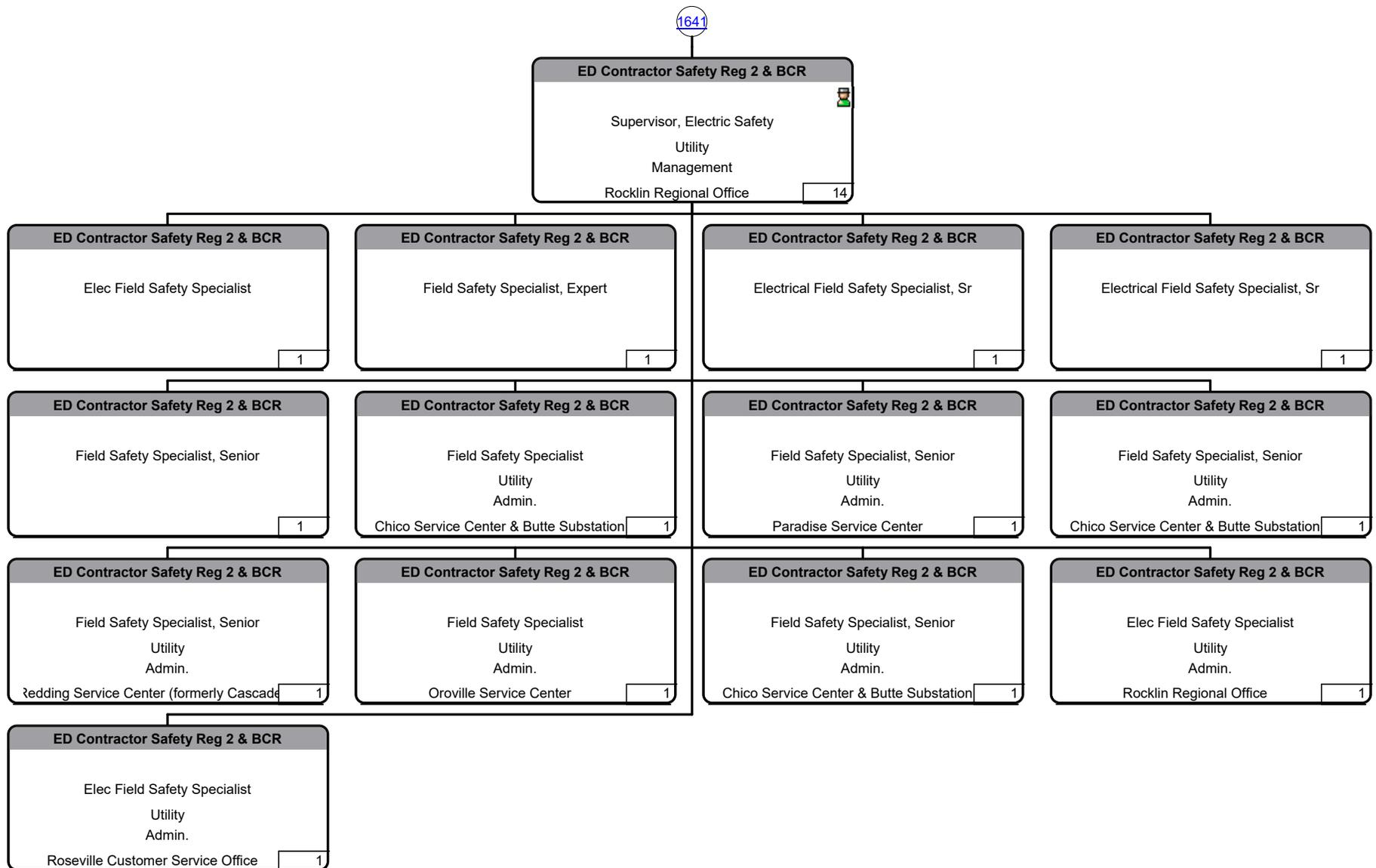


### ED Contractor Safety - Reg 4 & 5



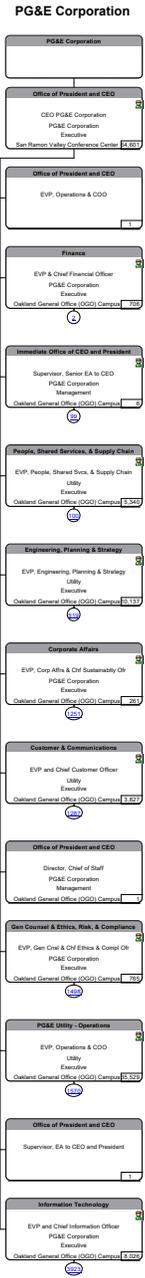
# ED Contractor Safety Reg 2 & BCR

(164)

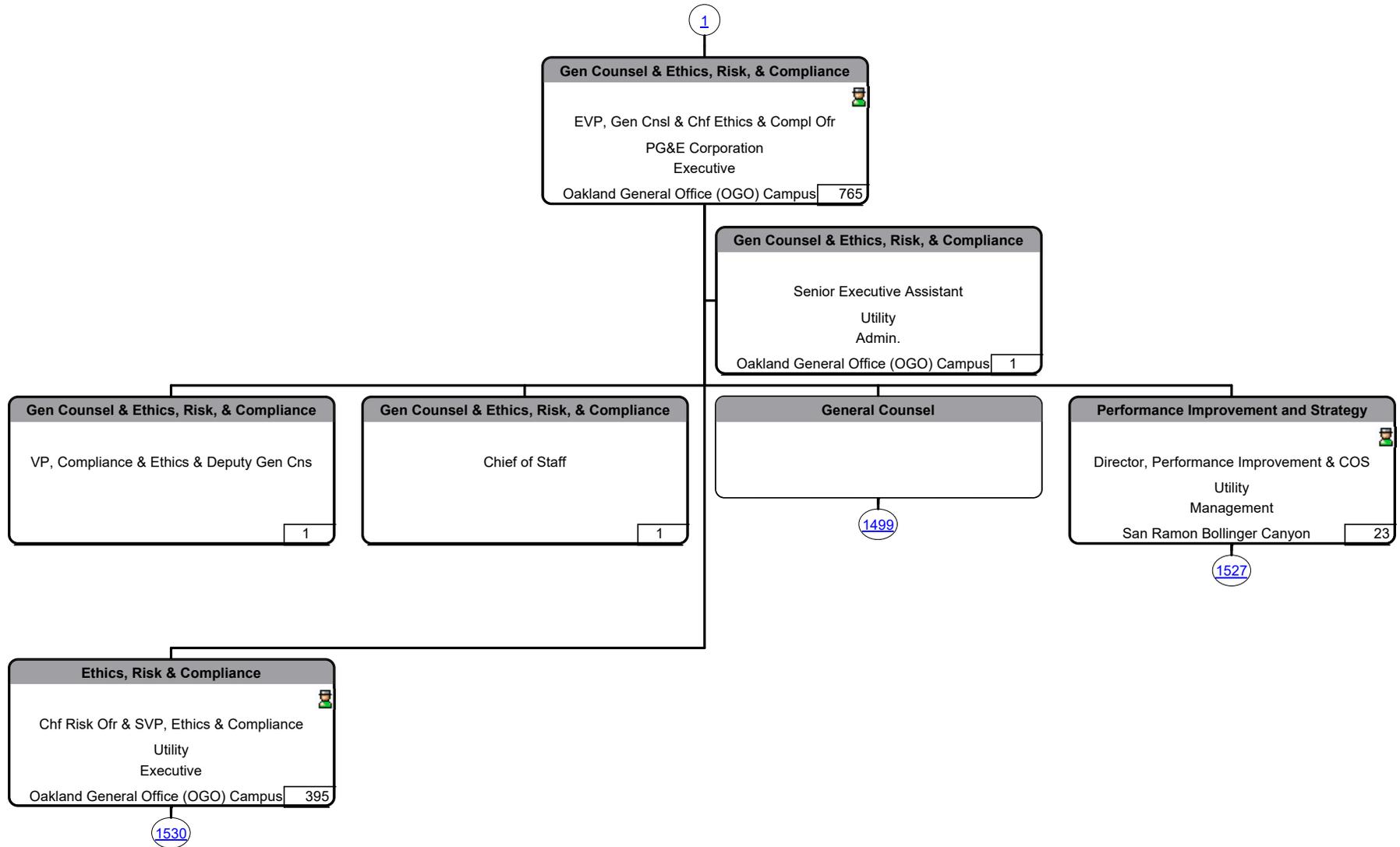


## **Attachment**

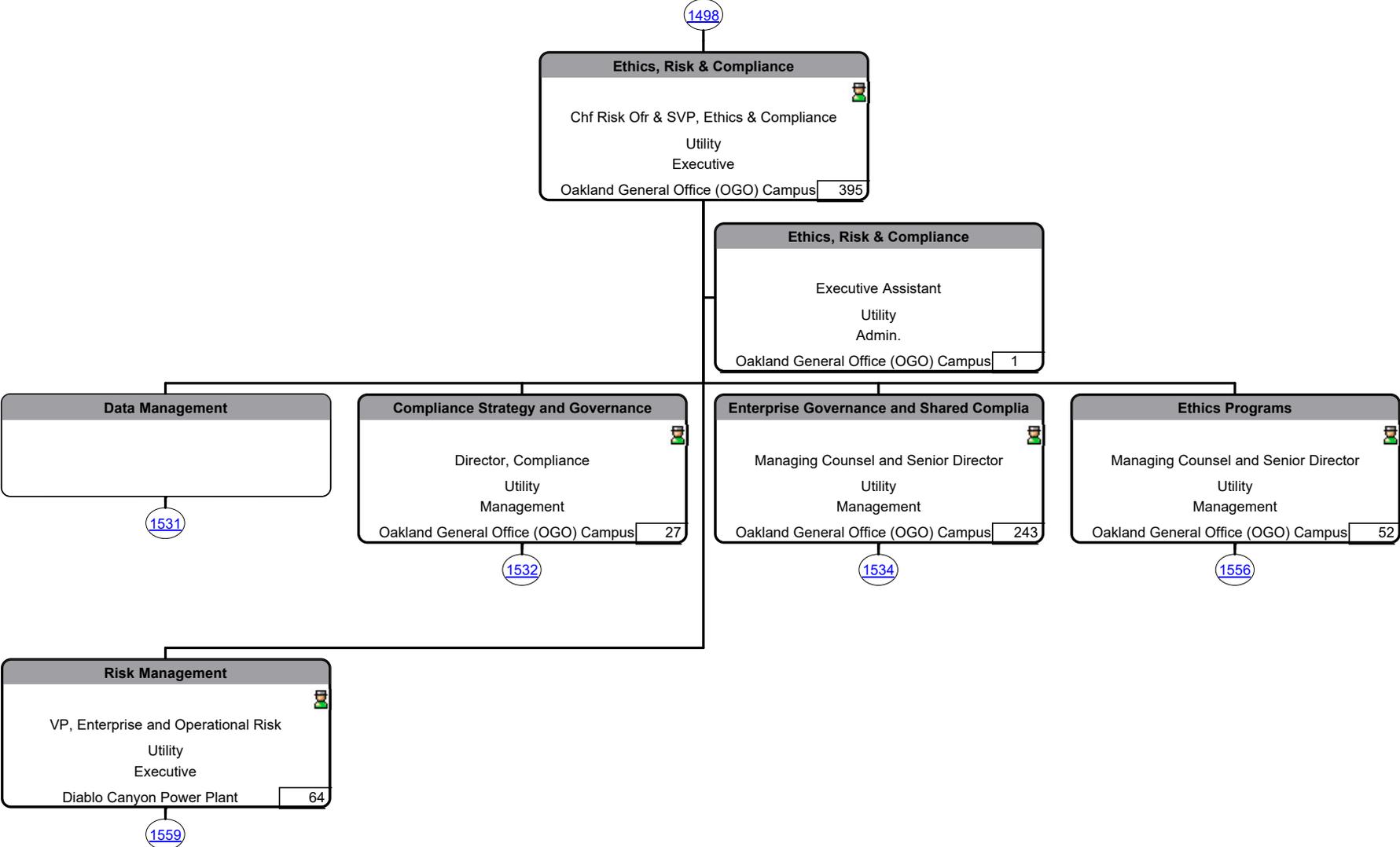
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# Gen Counsel & Ethics, Risk, & Compliance

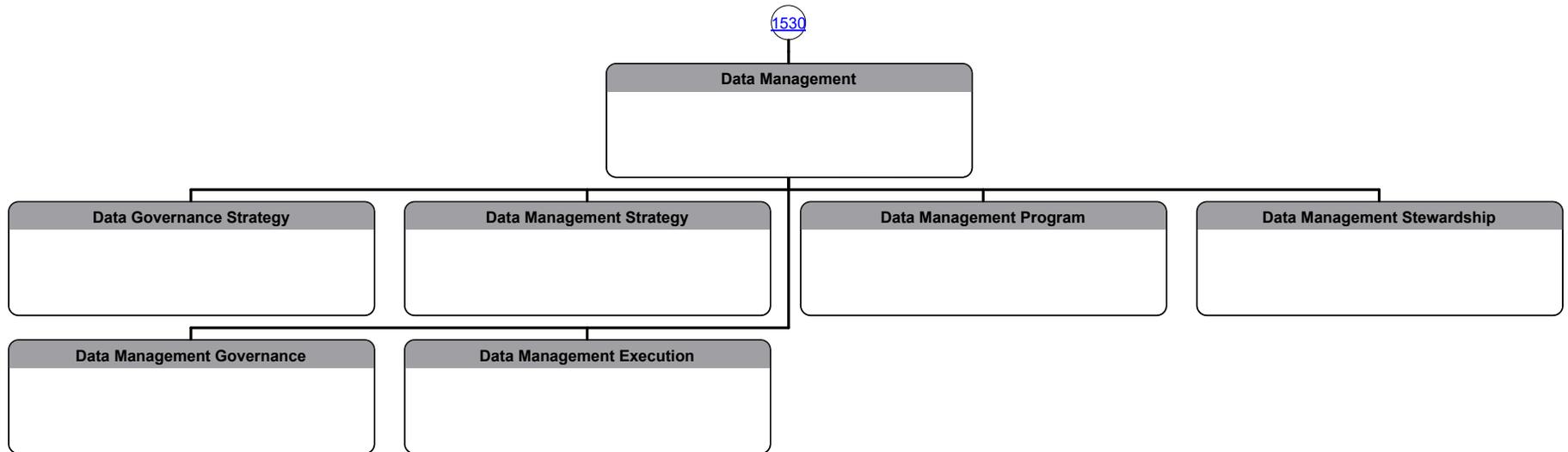


# Ethics, Risk & Compliance

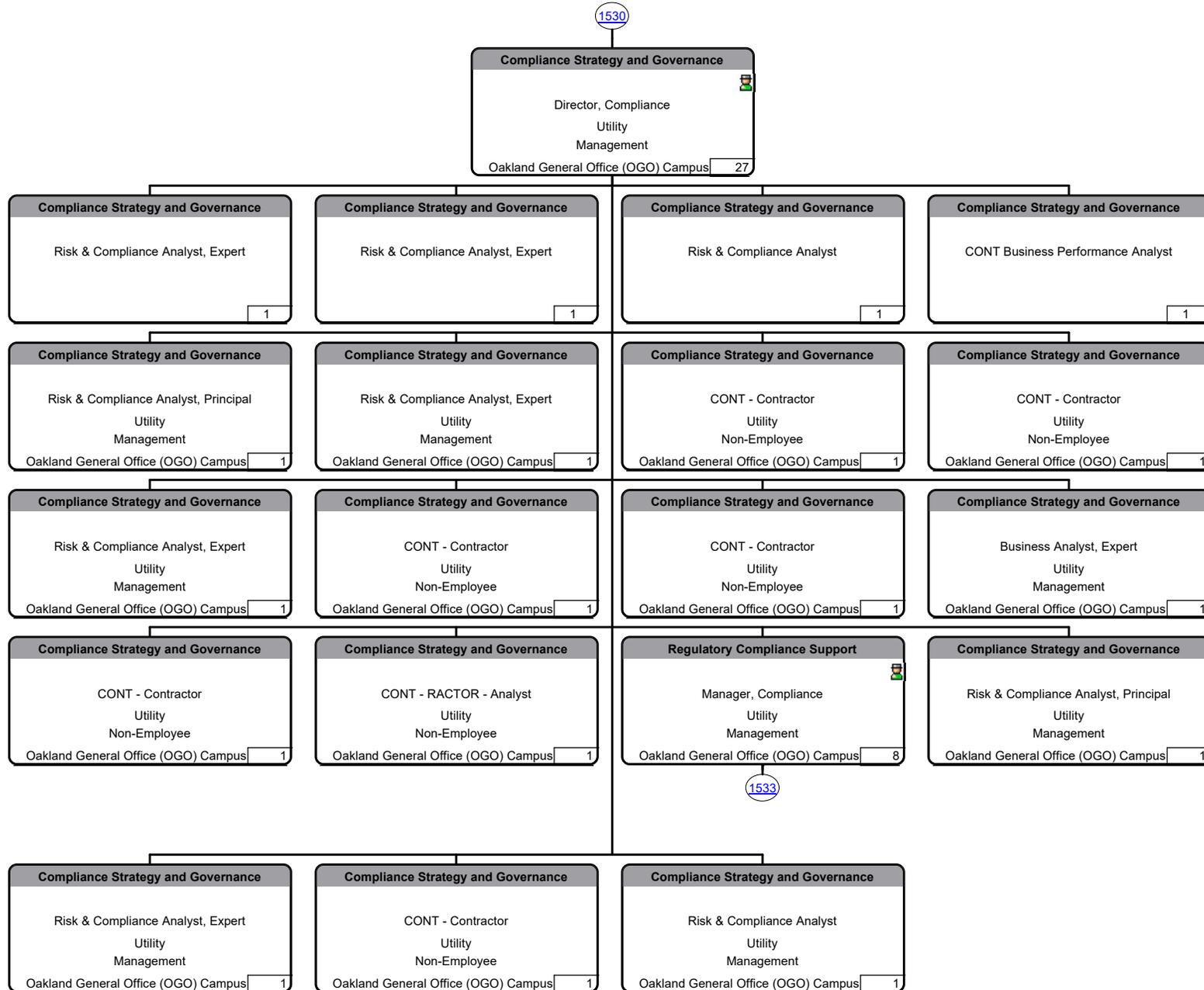


# Data Management

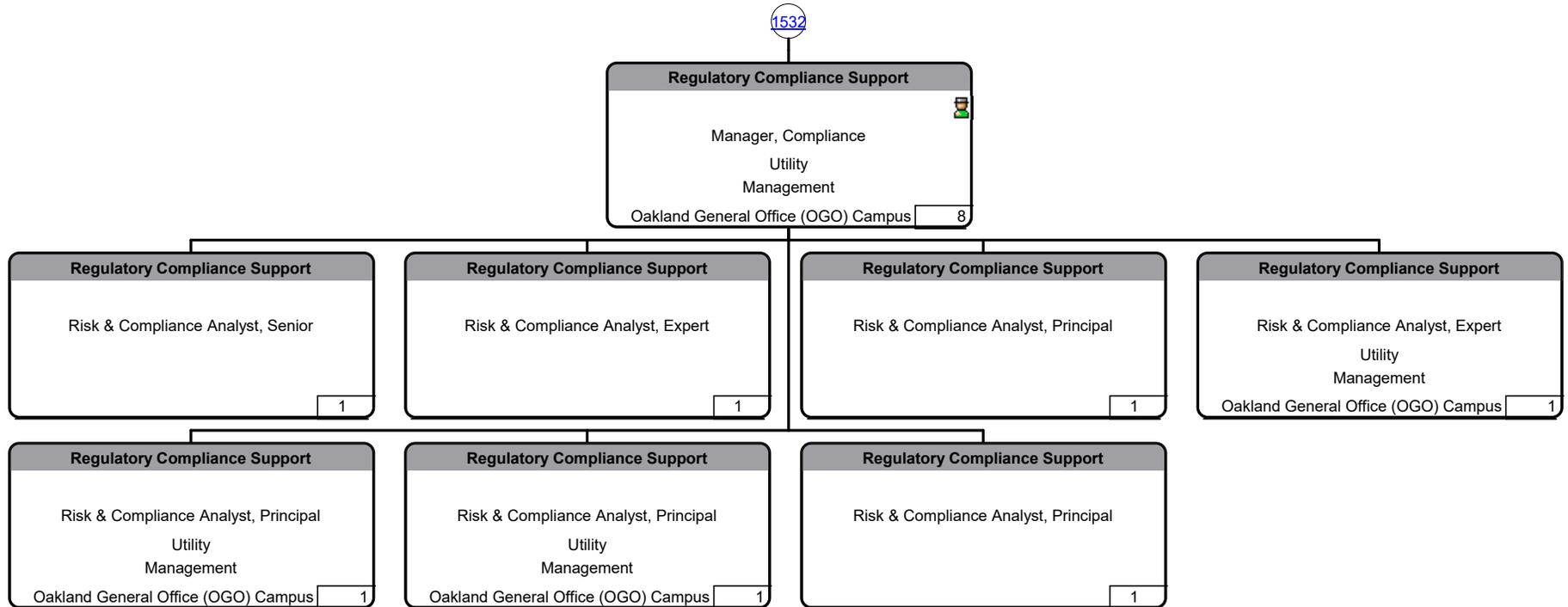
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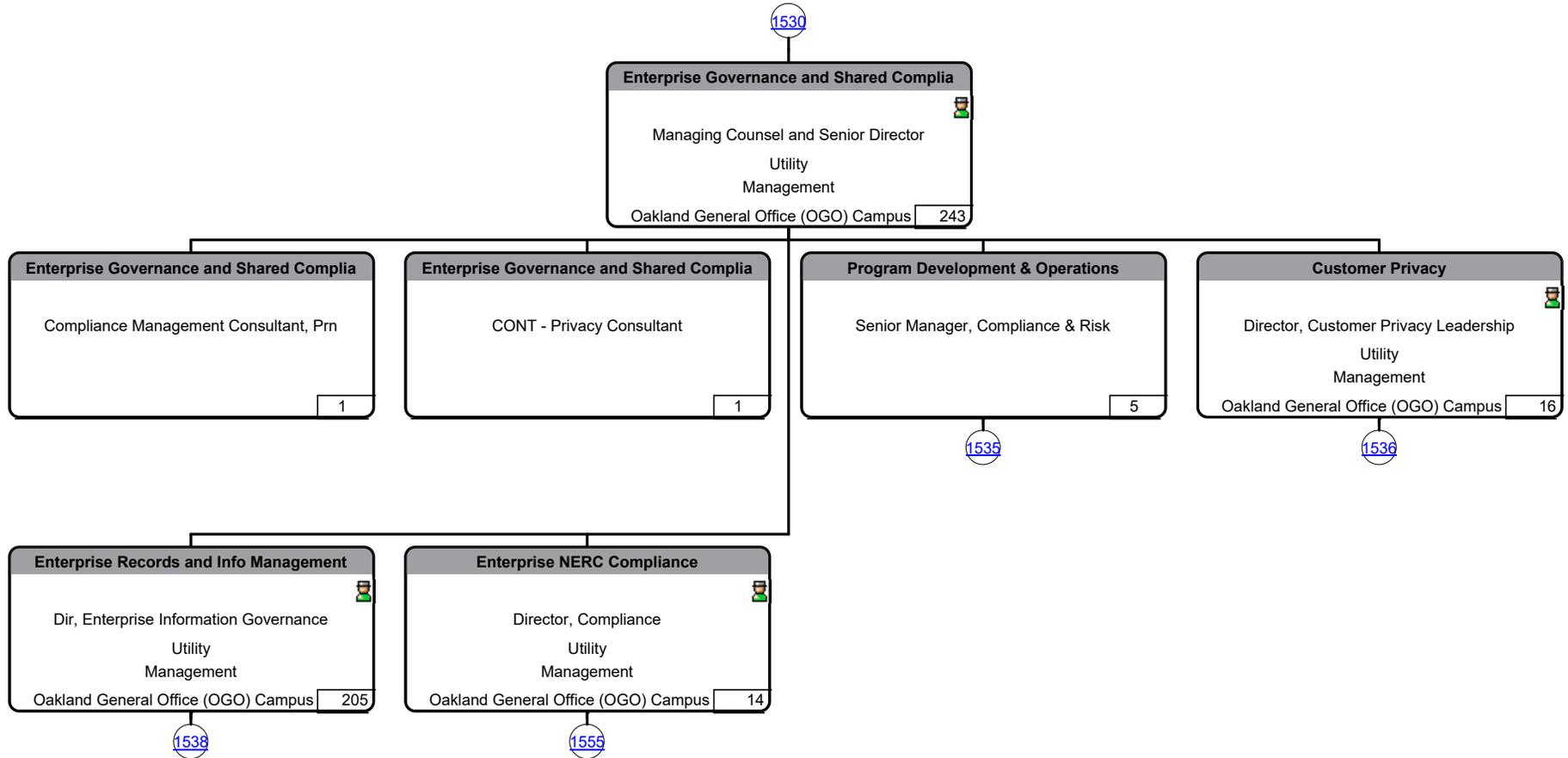
### Compliance Strategy and Governance



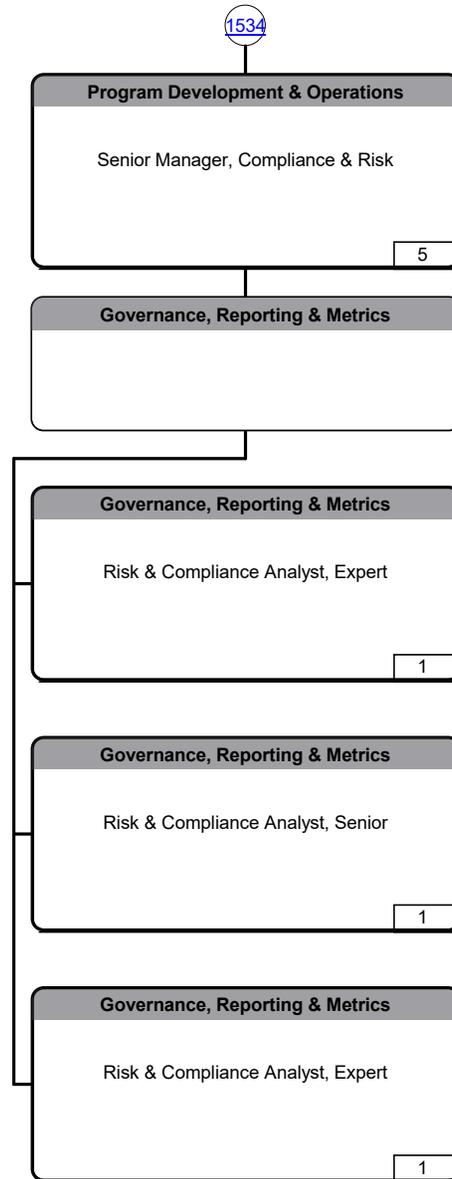
# Regulatory Compliance Support



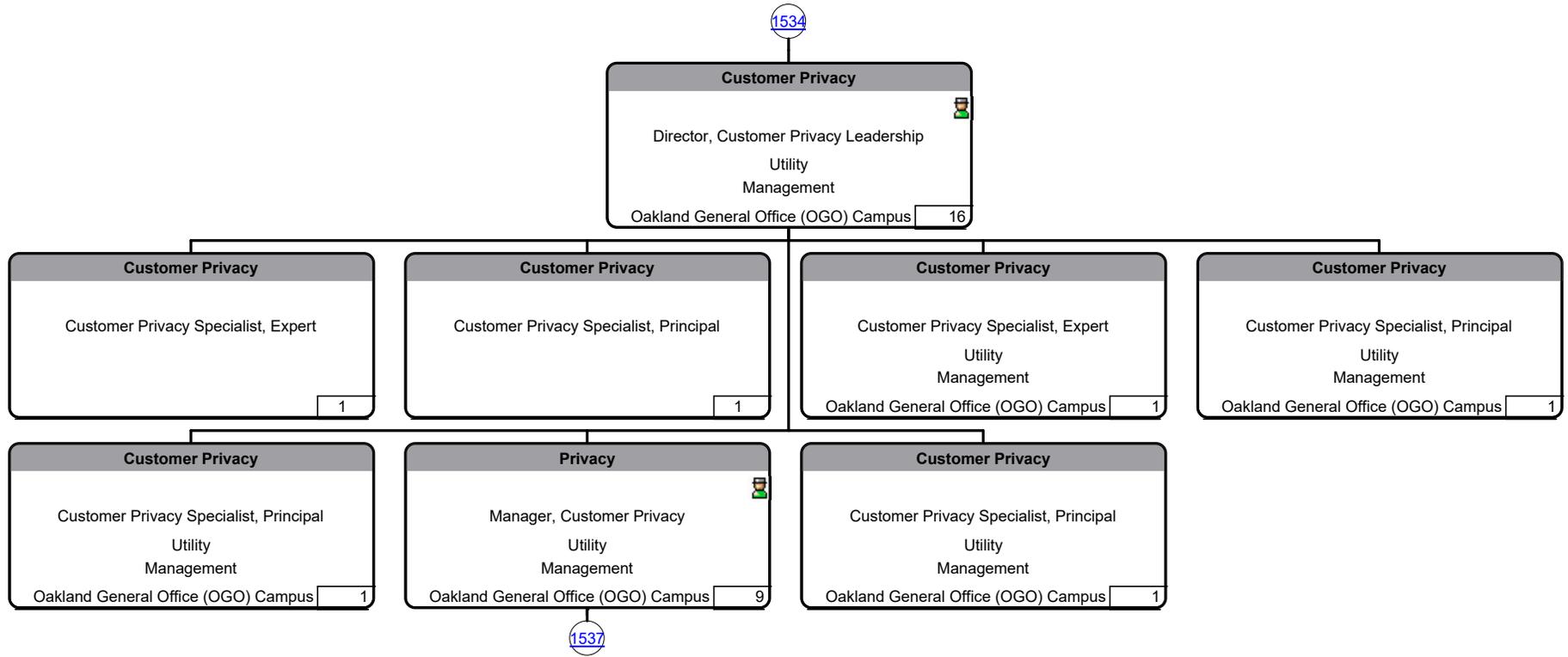
# Enterprise Governance and Shared Complia



# Program Development & Operations

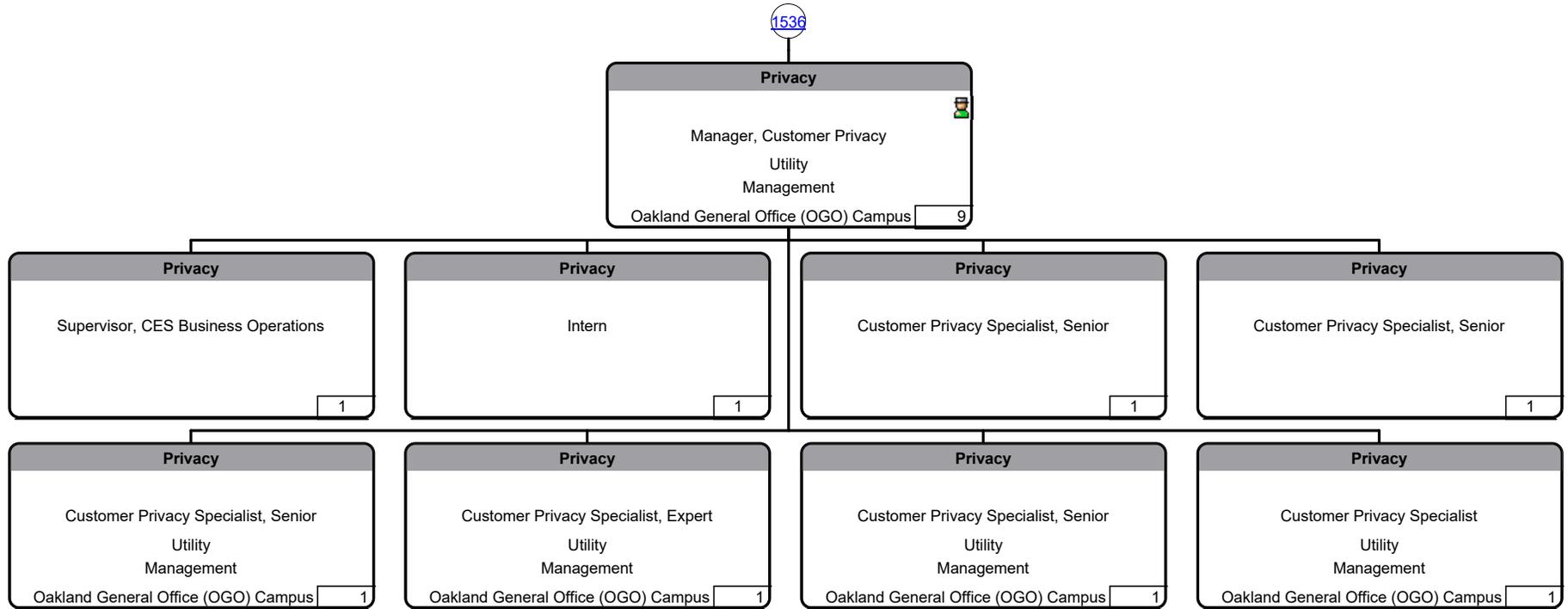


# Customer Privacy

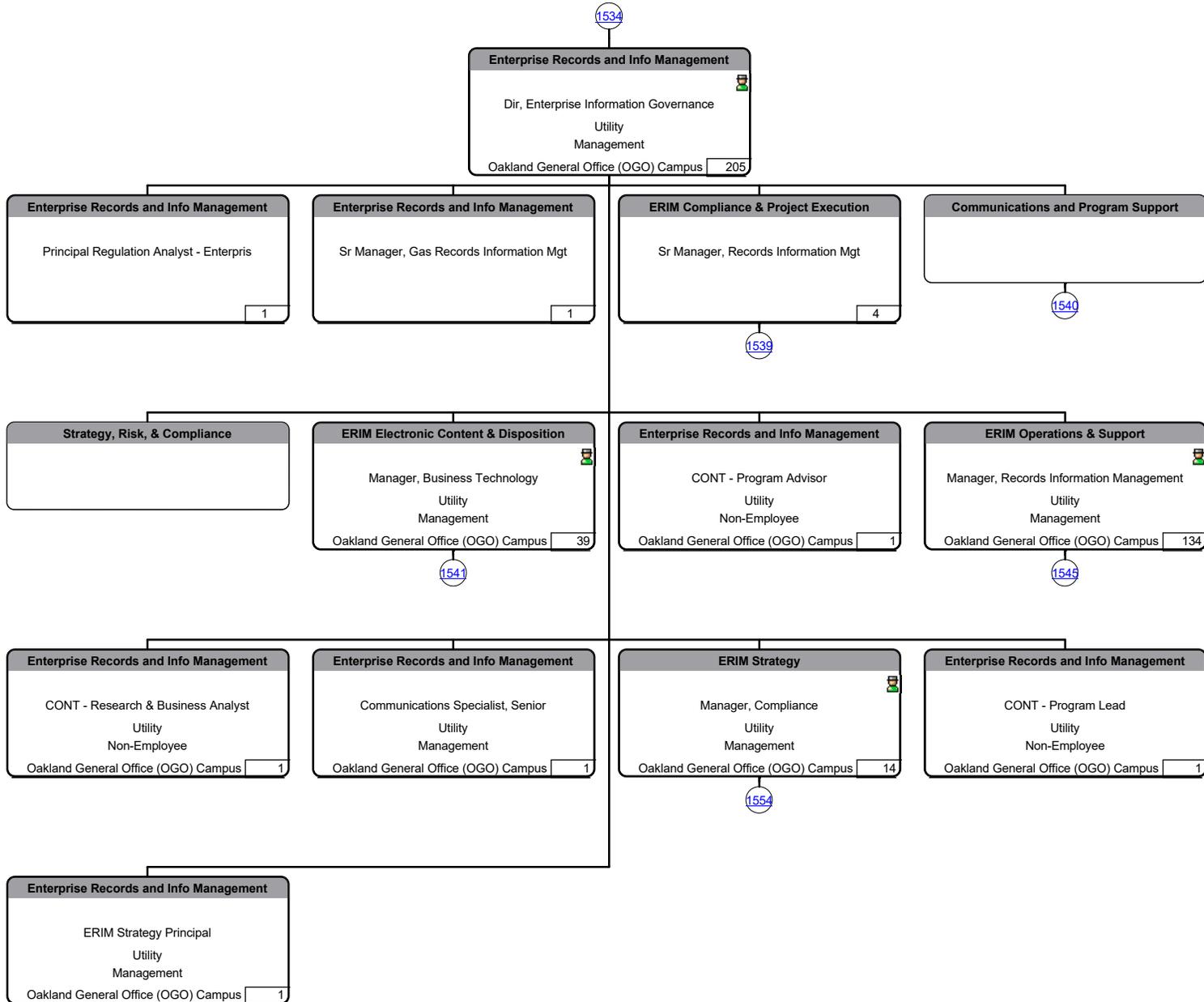


# Privacy

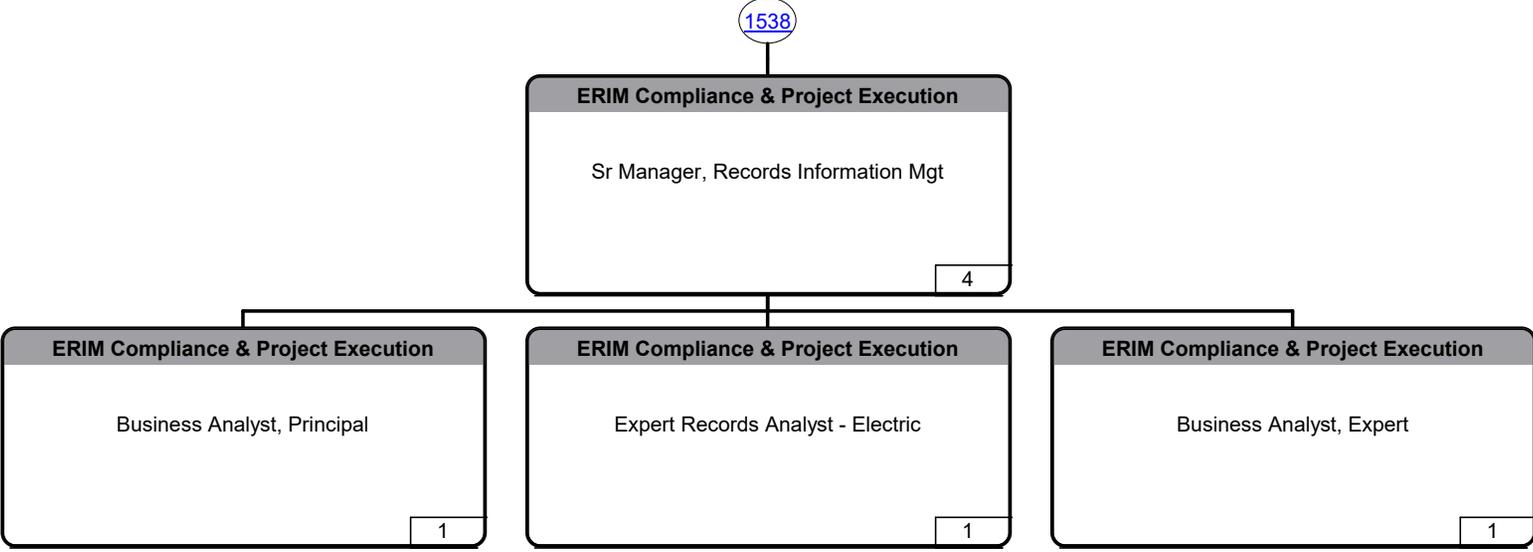
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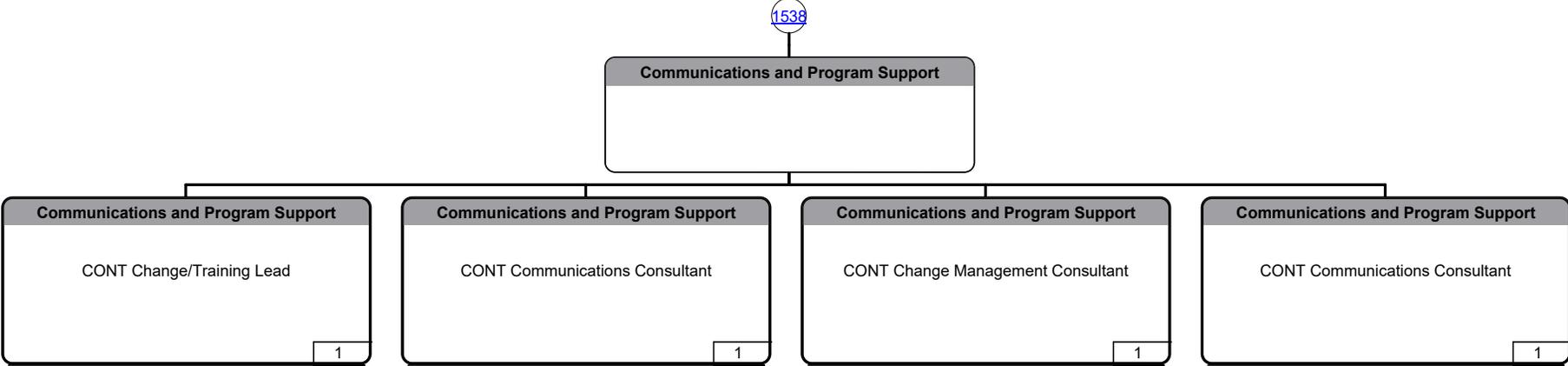
Enterprise Records and Info Management  
**Enterprise Records and Info Management**



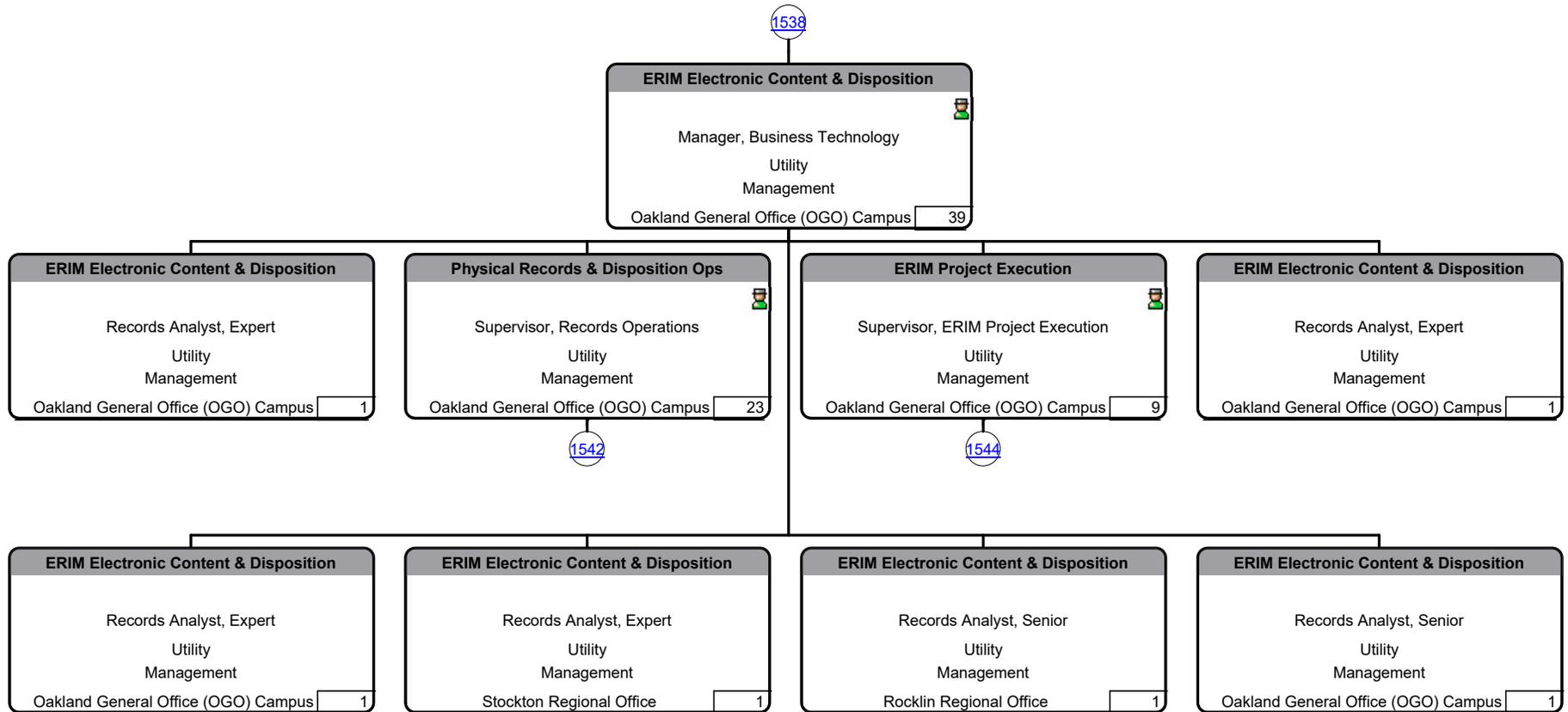
# ERIM Compliance & Project Execution



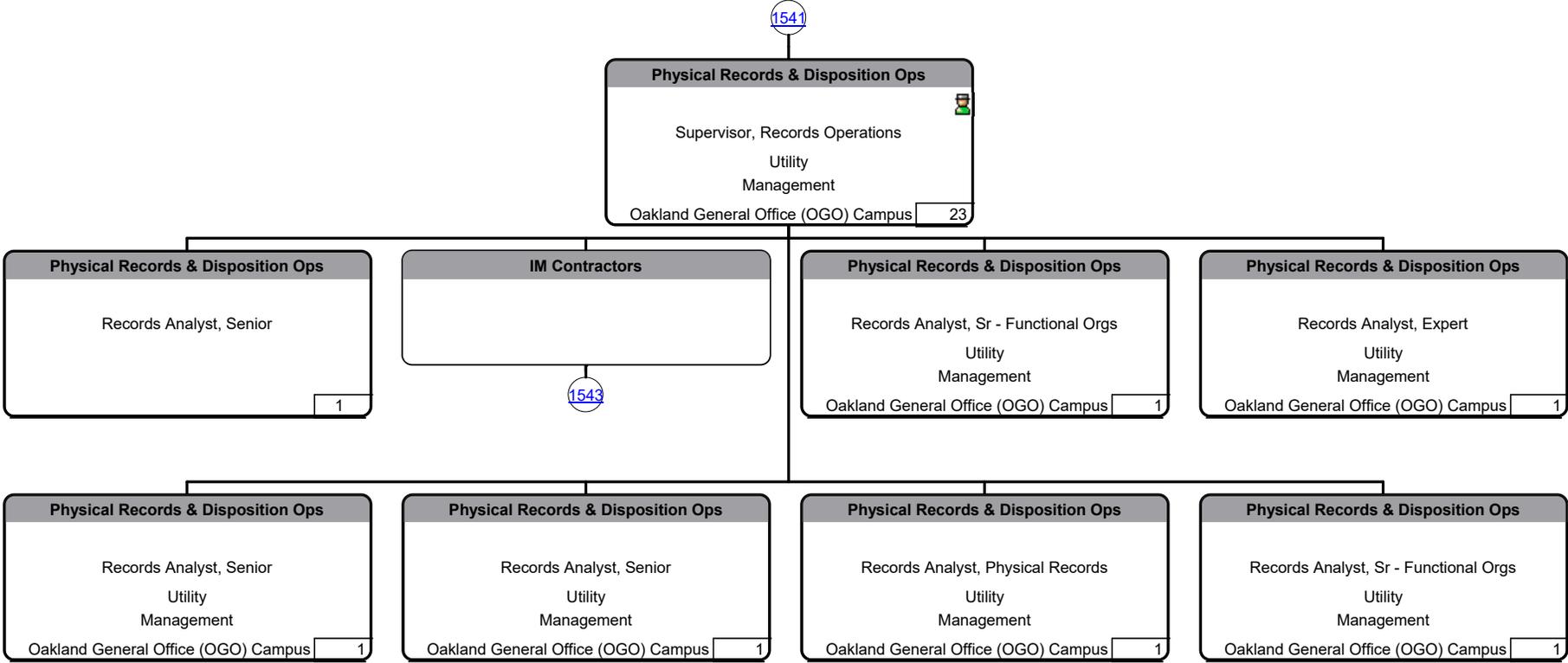
### Communications and Program Support



## ERIM Electronic Content & Disposition

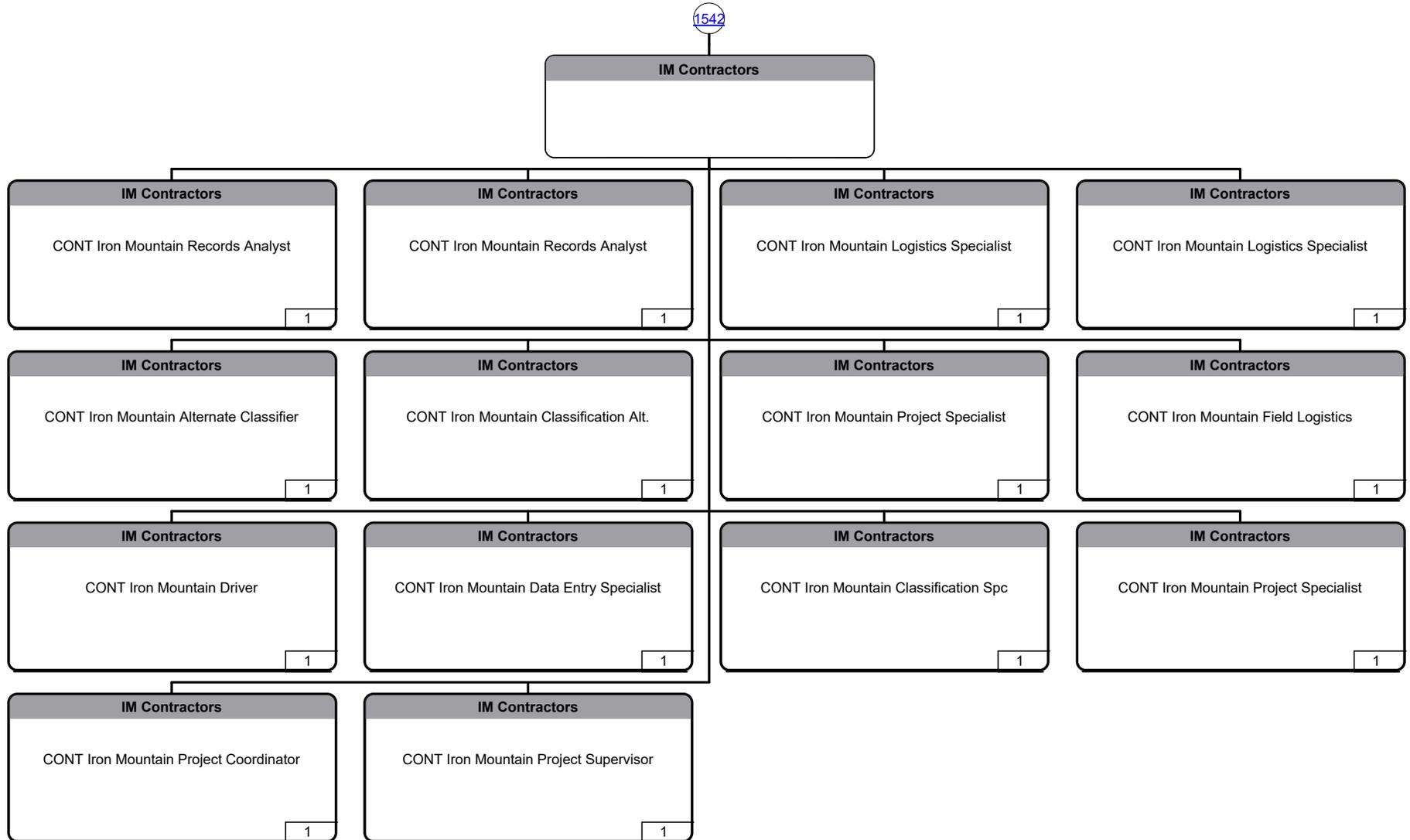


### Physical Records & Disposition Ops

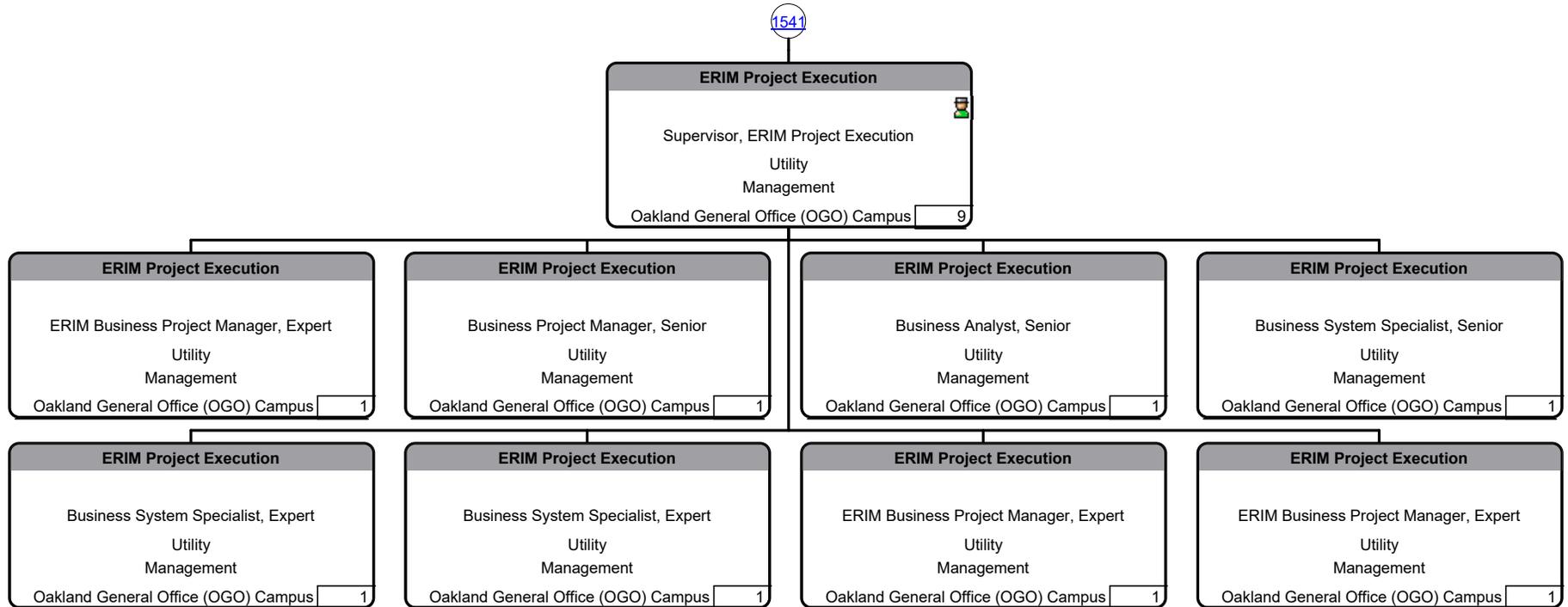


# IM Contractors

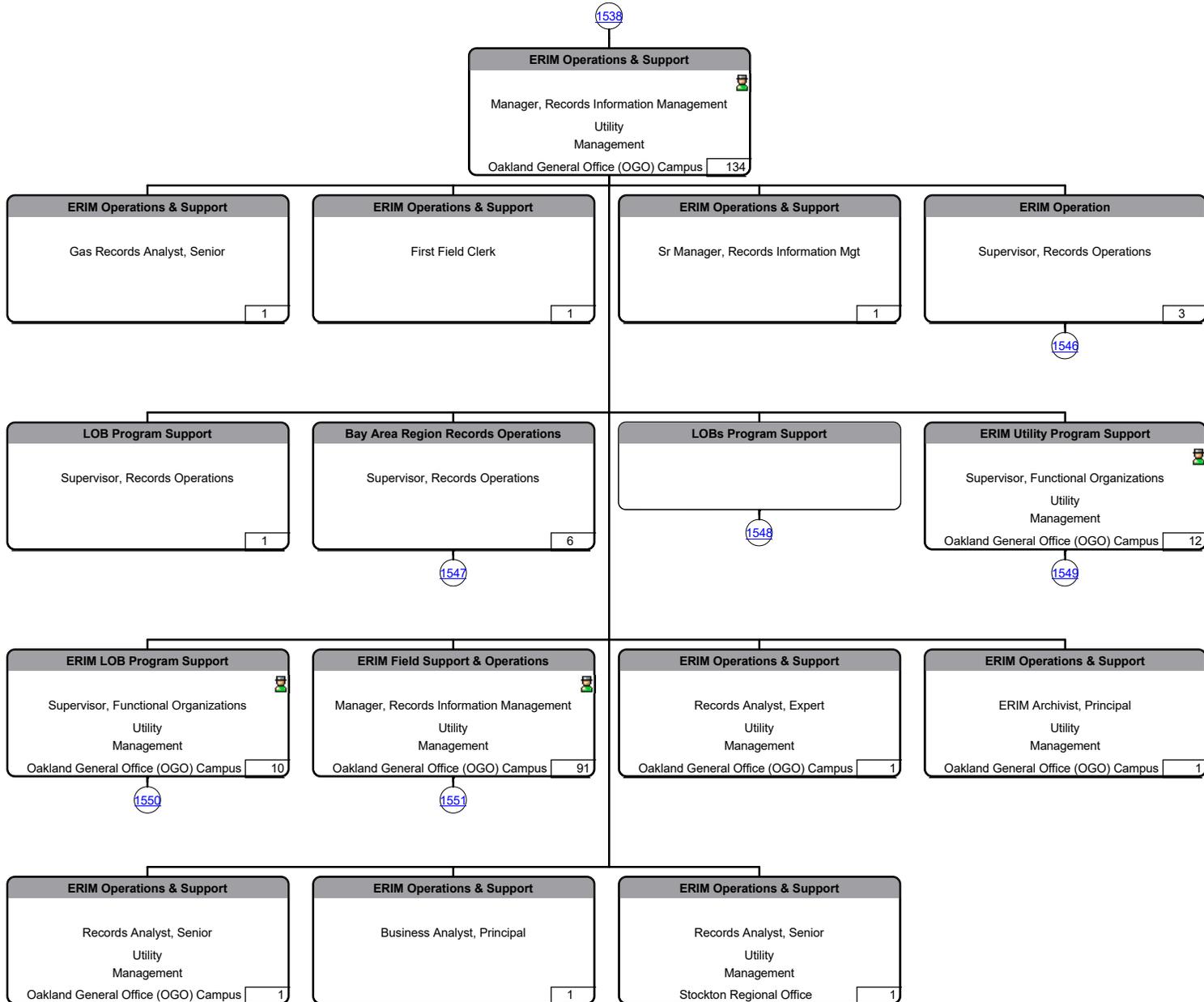
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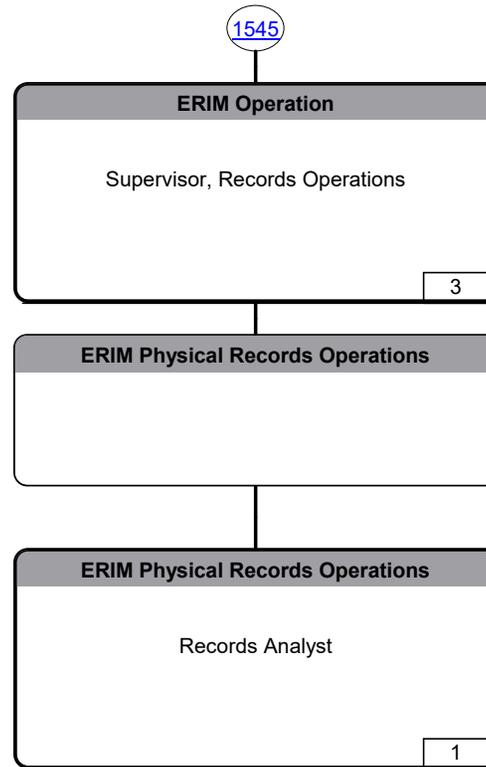
# ERIM Project Execution



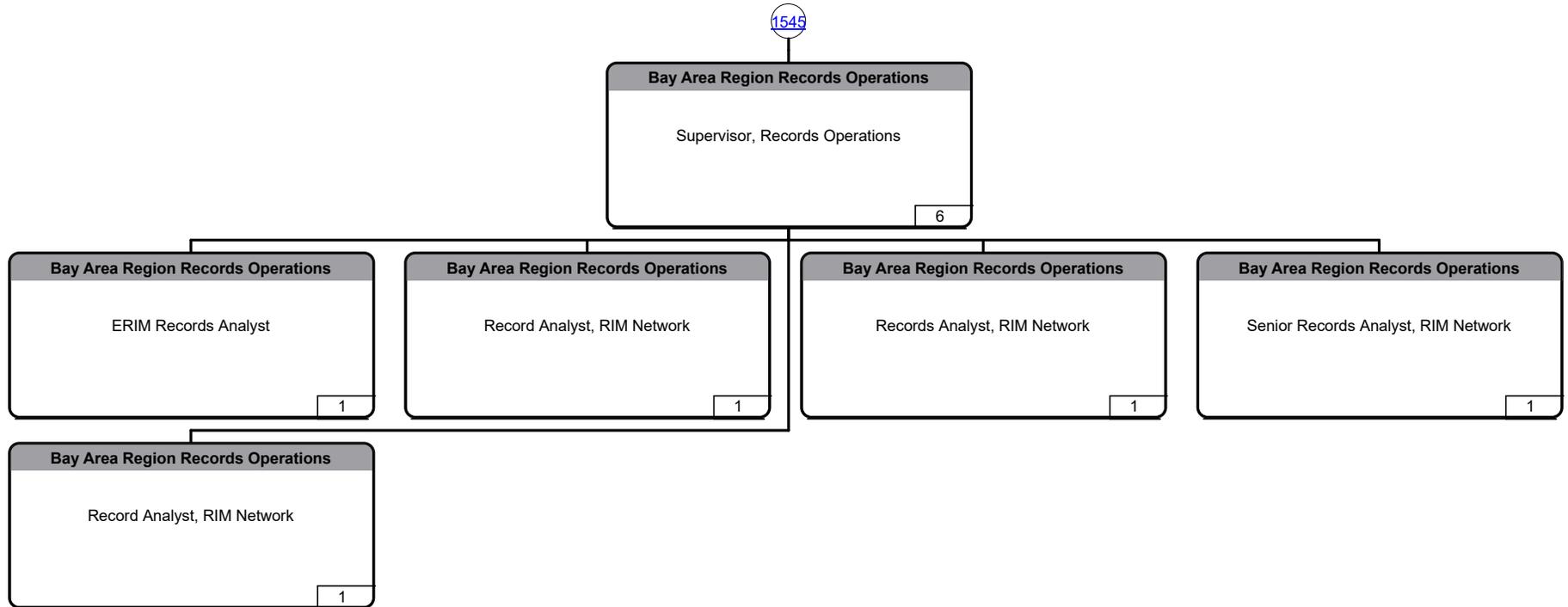
# ERIM Operations & Support



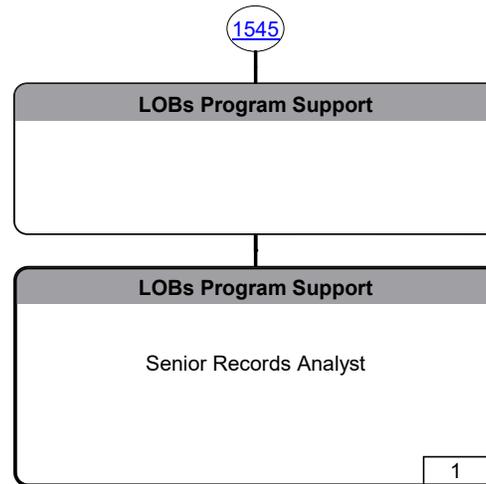
# ERIM Operation



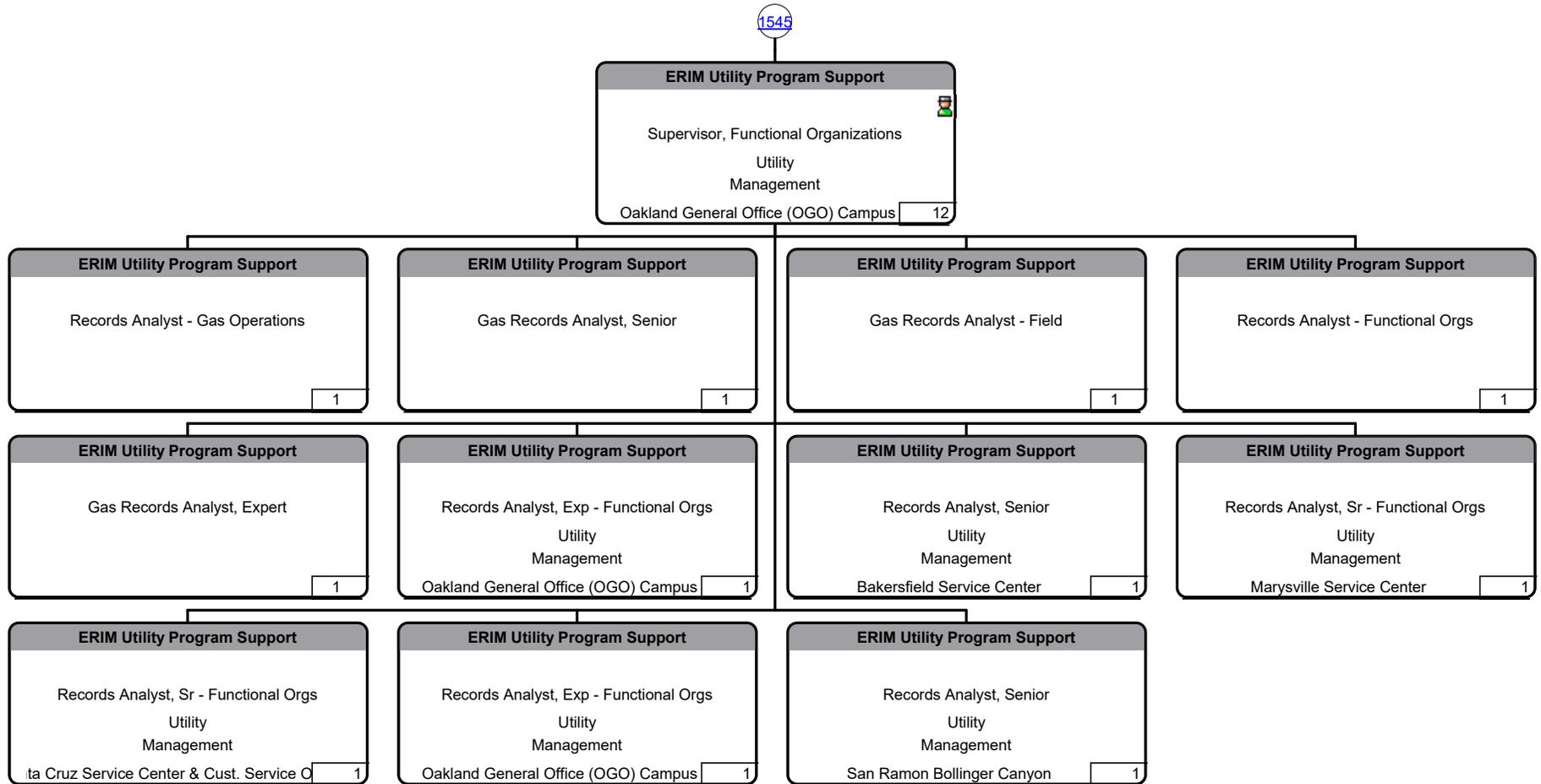
### Bay Area Region Records Operations



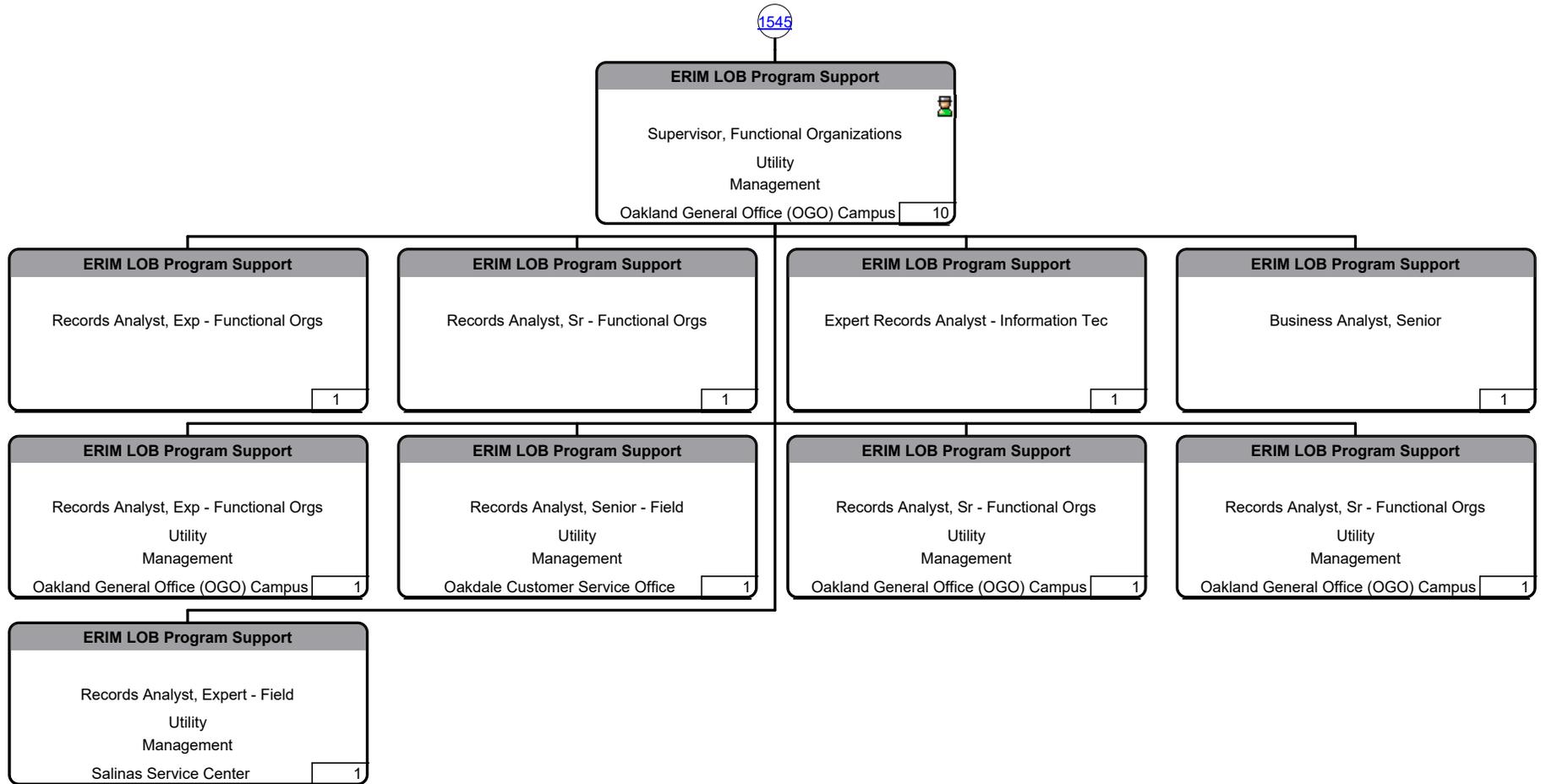
## LOBs Program Support



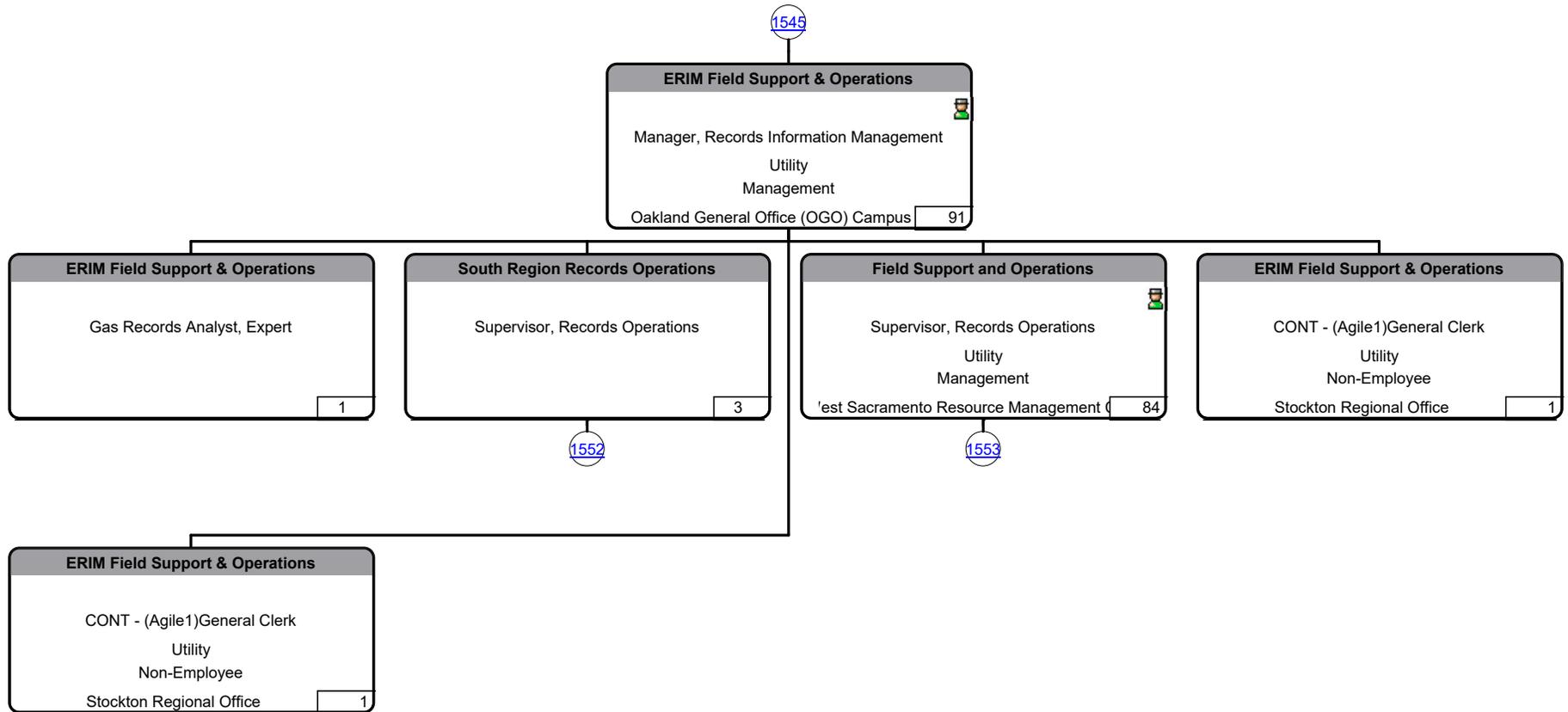
## ERIM Utility Program Support



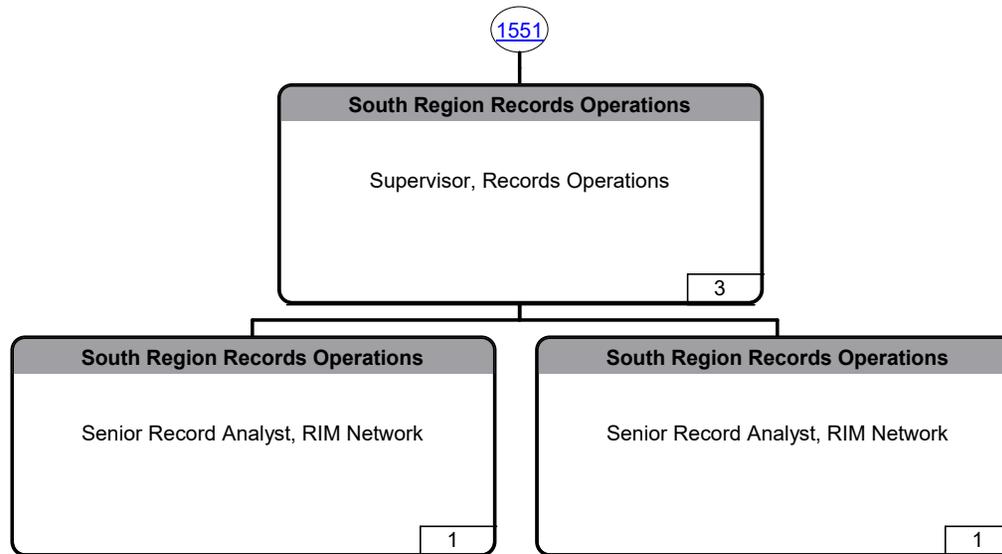
# ERIM LOB Program Support



### ERIM Field Support & Operations



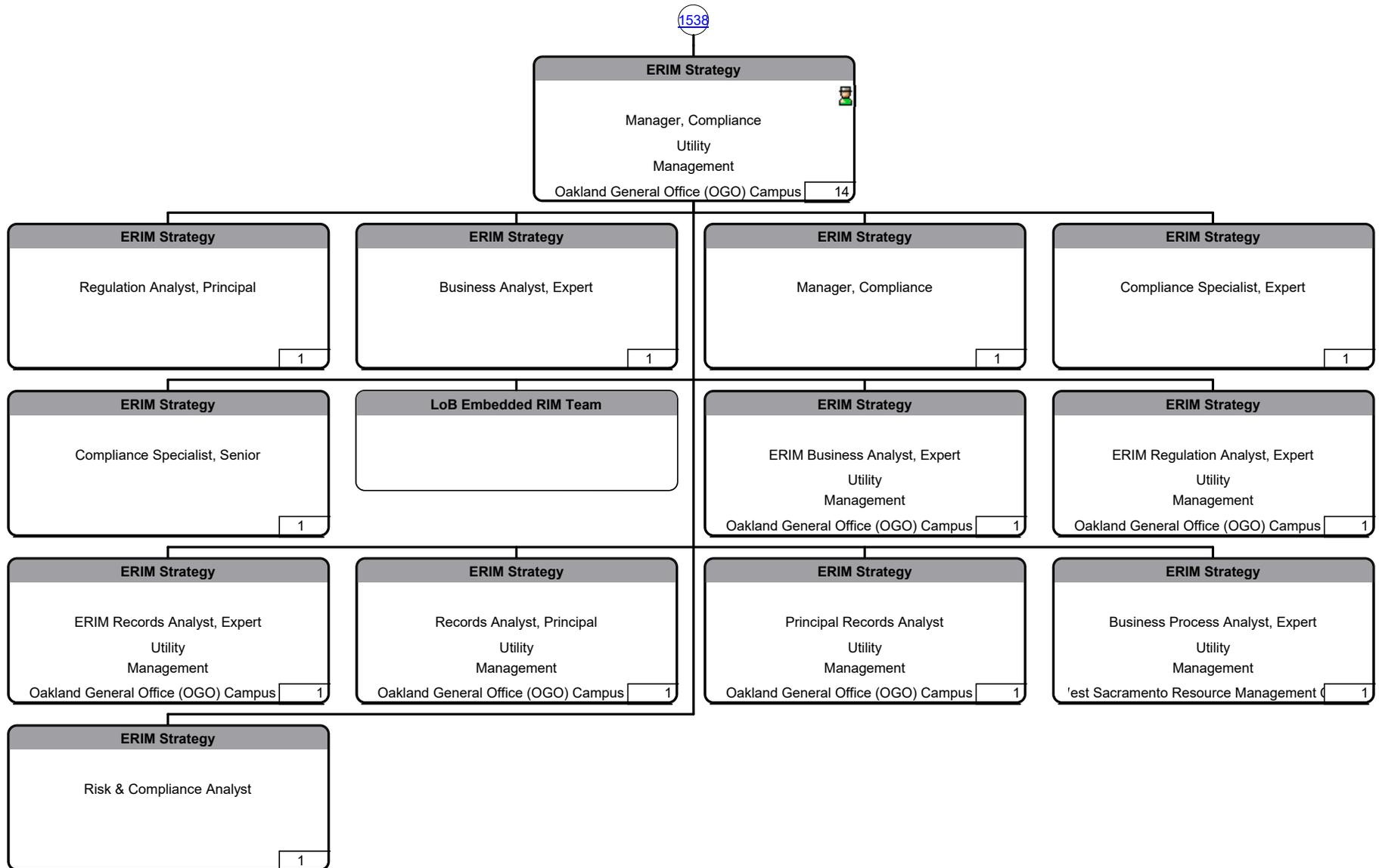
## South Region Records Operations



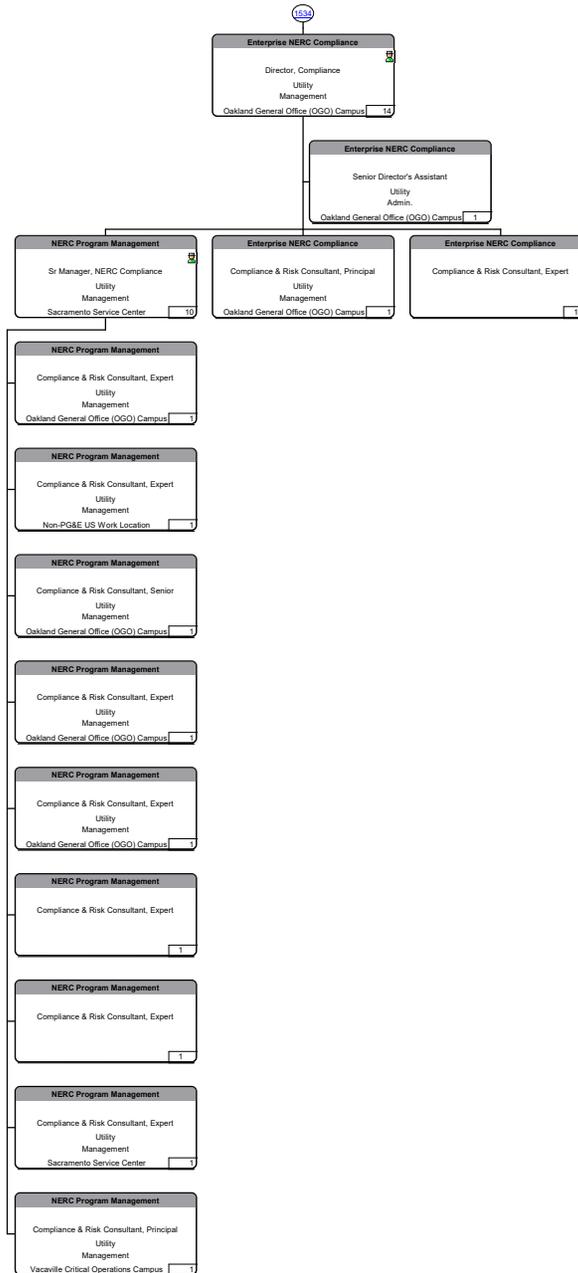


# ERIM Strategy

1539



## Enterprise NERC Compliance



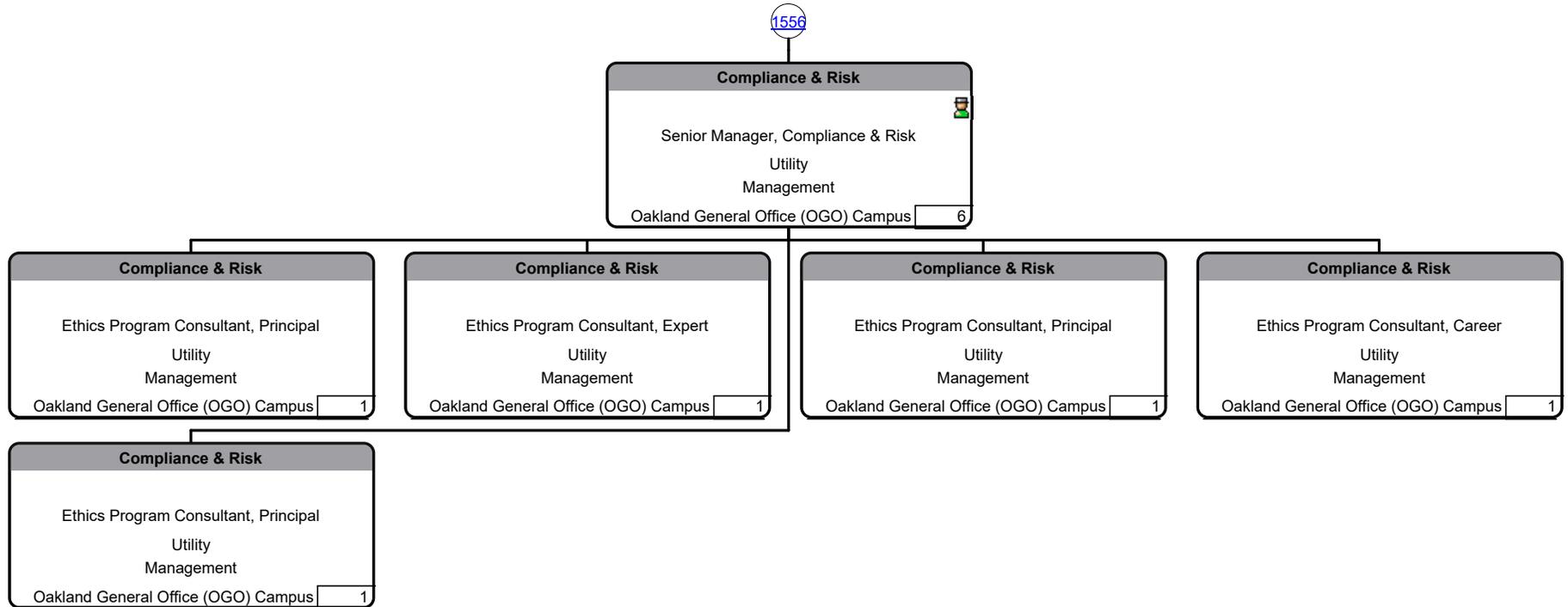
# Ethics Programs

## Ethics Programs

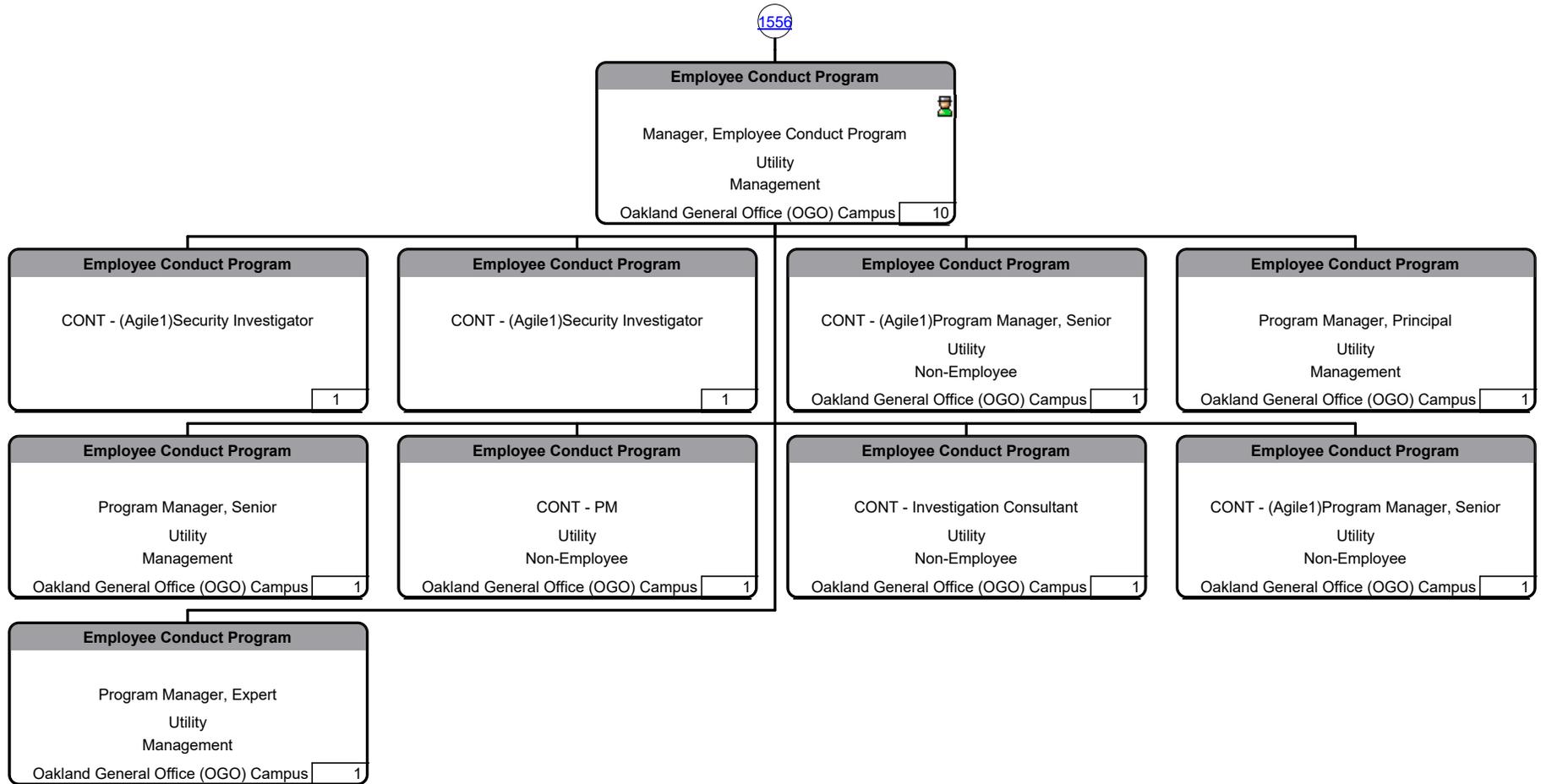


# Compliance & Risk

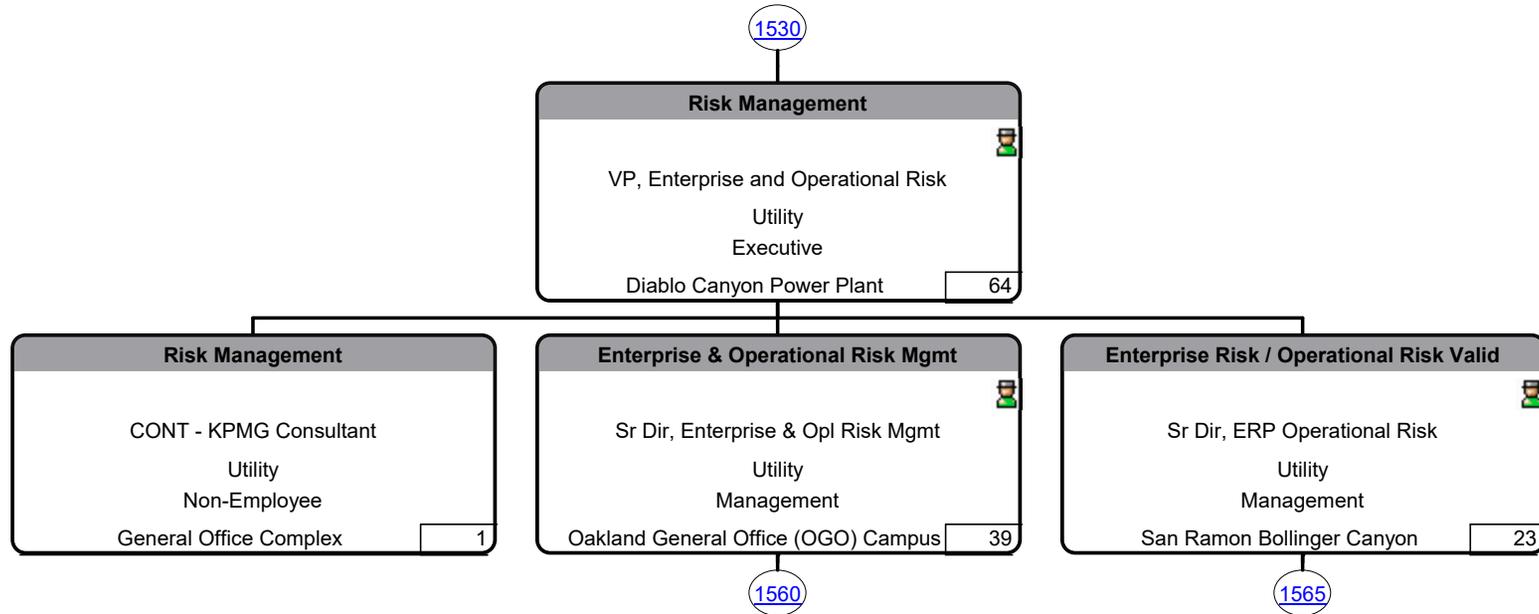
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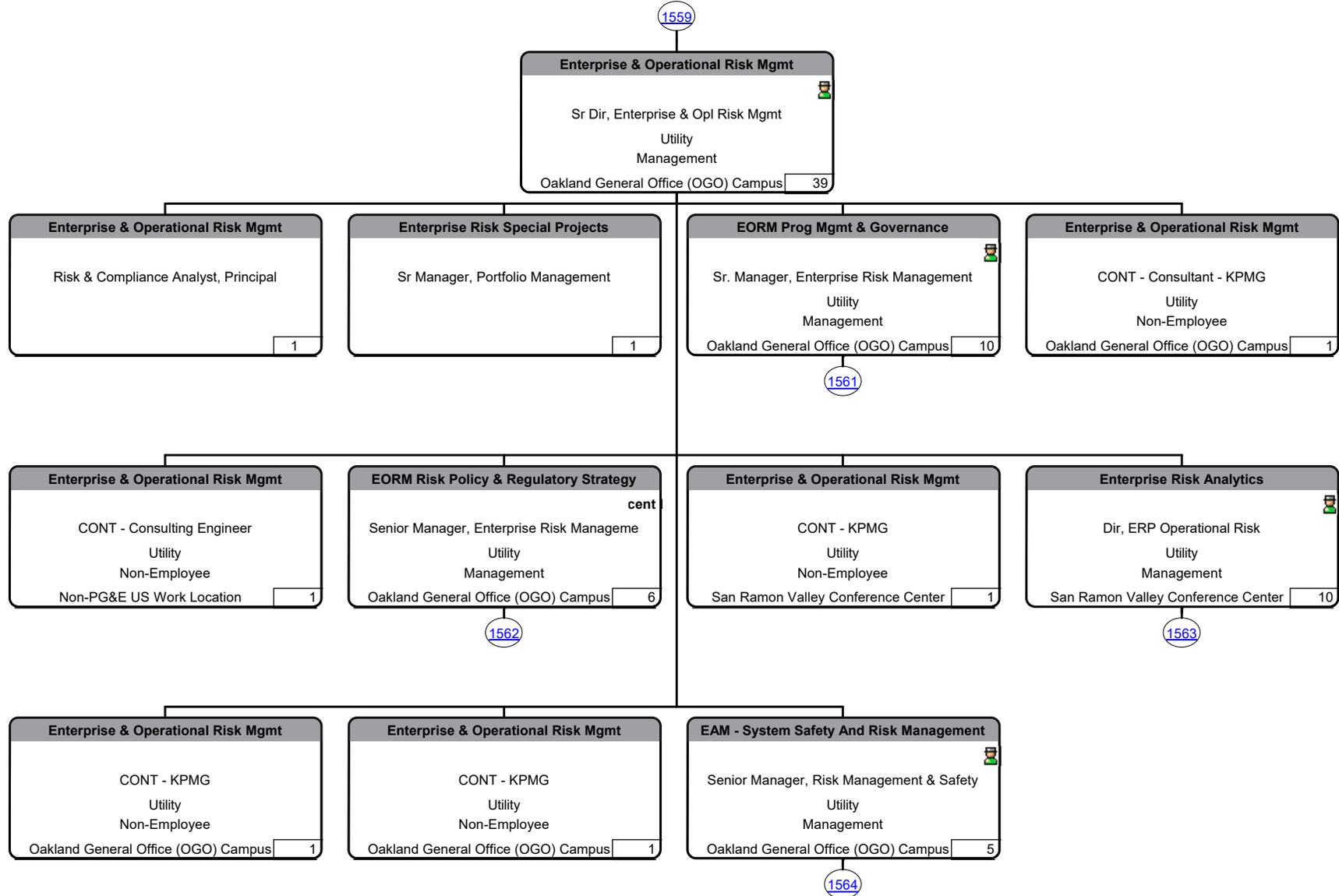
# Employee Conduct Program



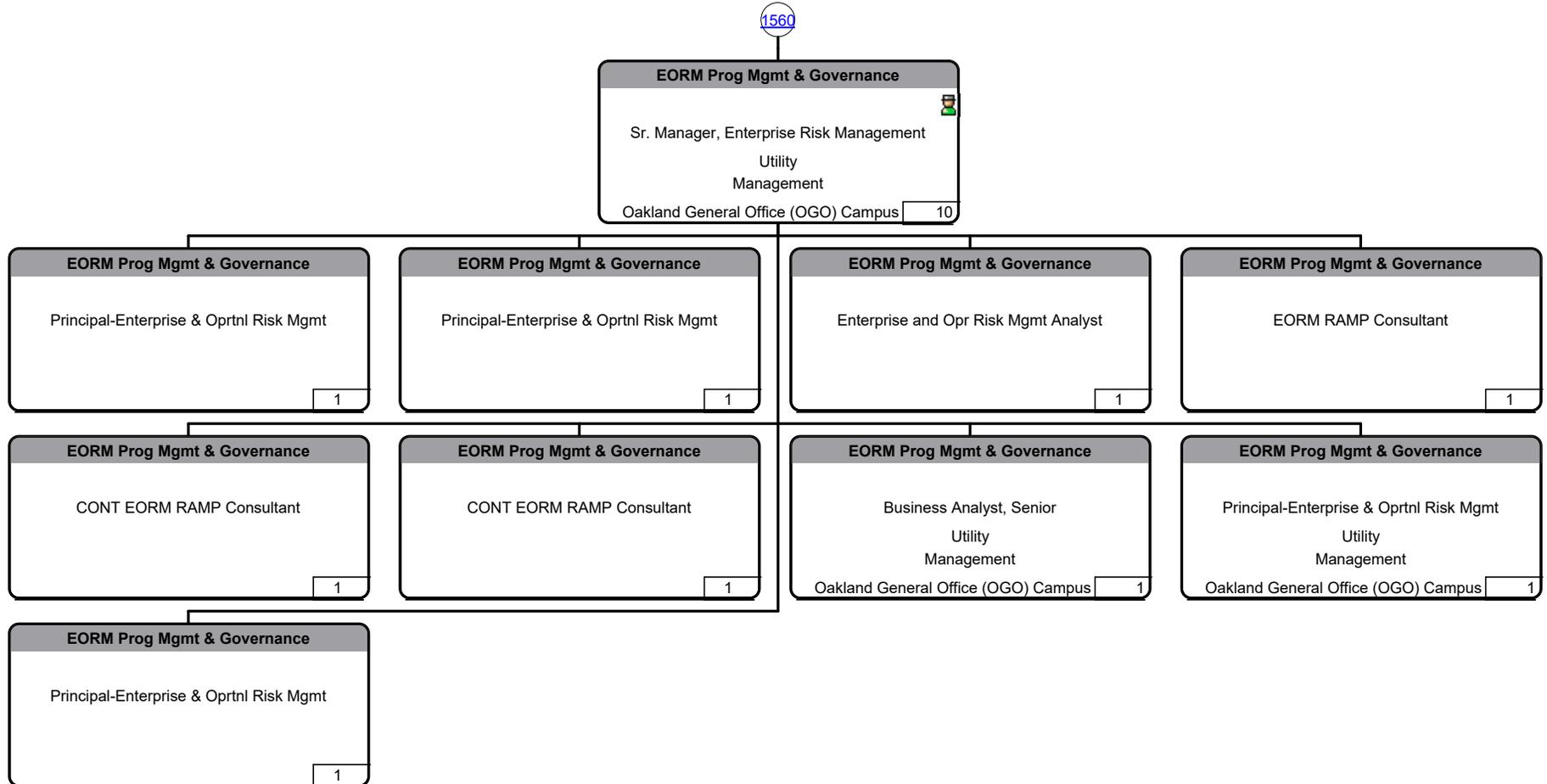
# Risk Management



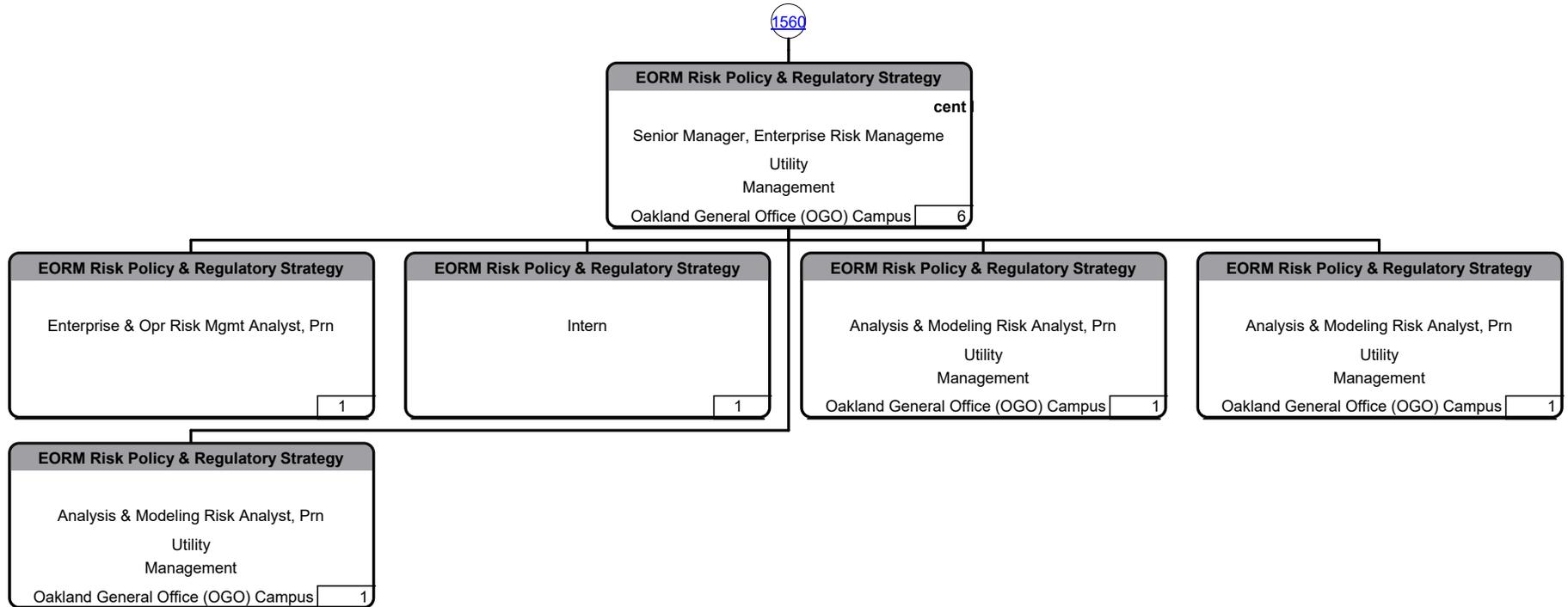
# Enterprise & Operational Risk Mgmt



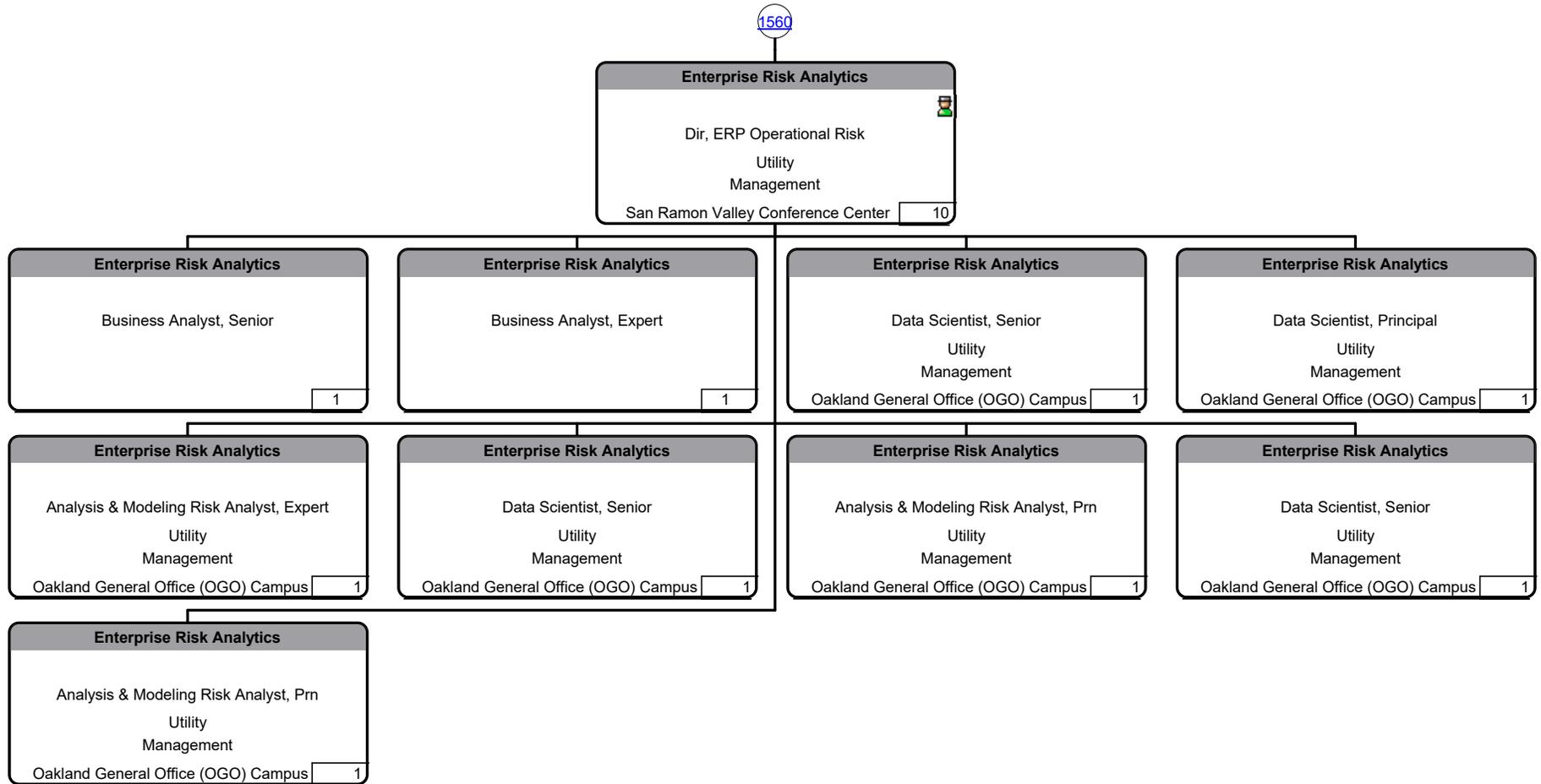
## EORM Prog Mgmt & Governance



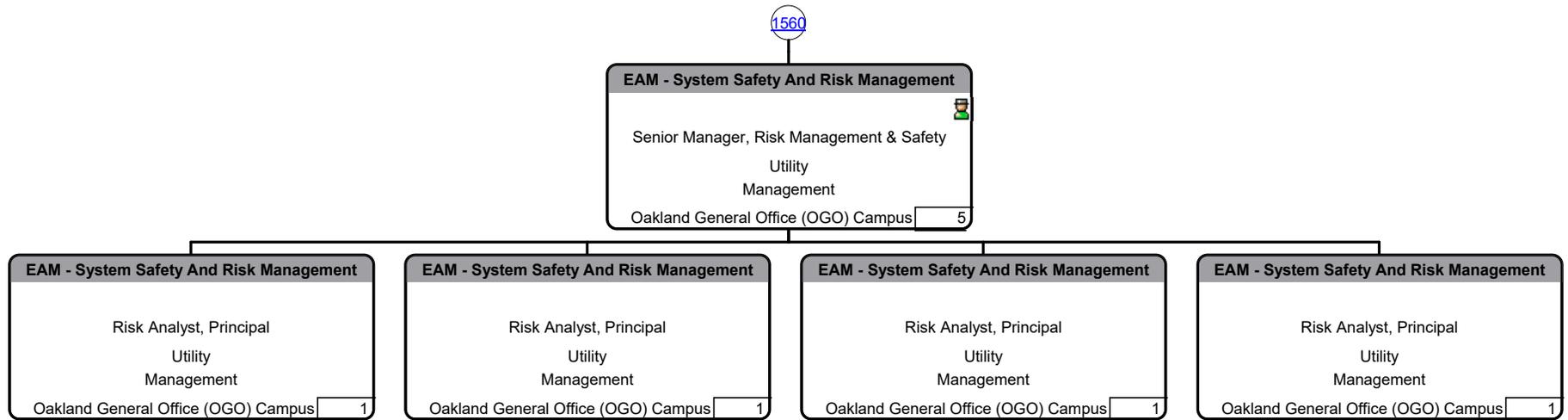
### EORM Risk Policy & Regulatory Strategy



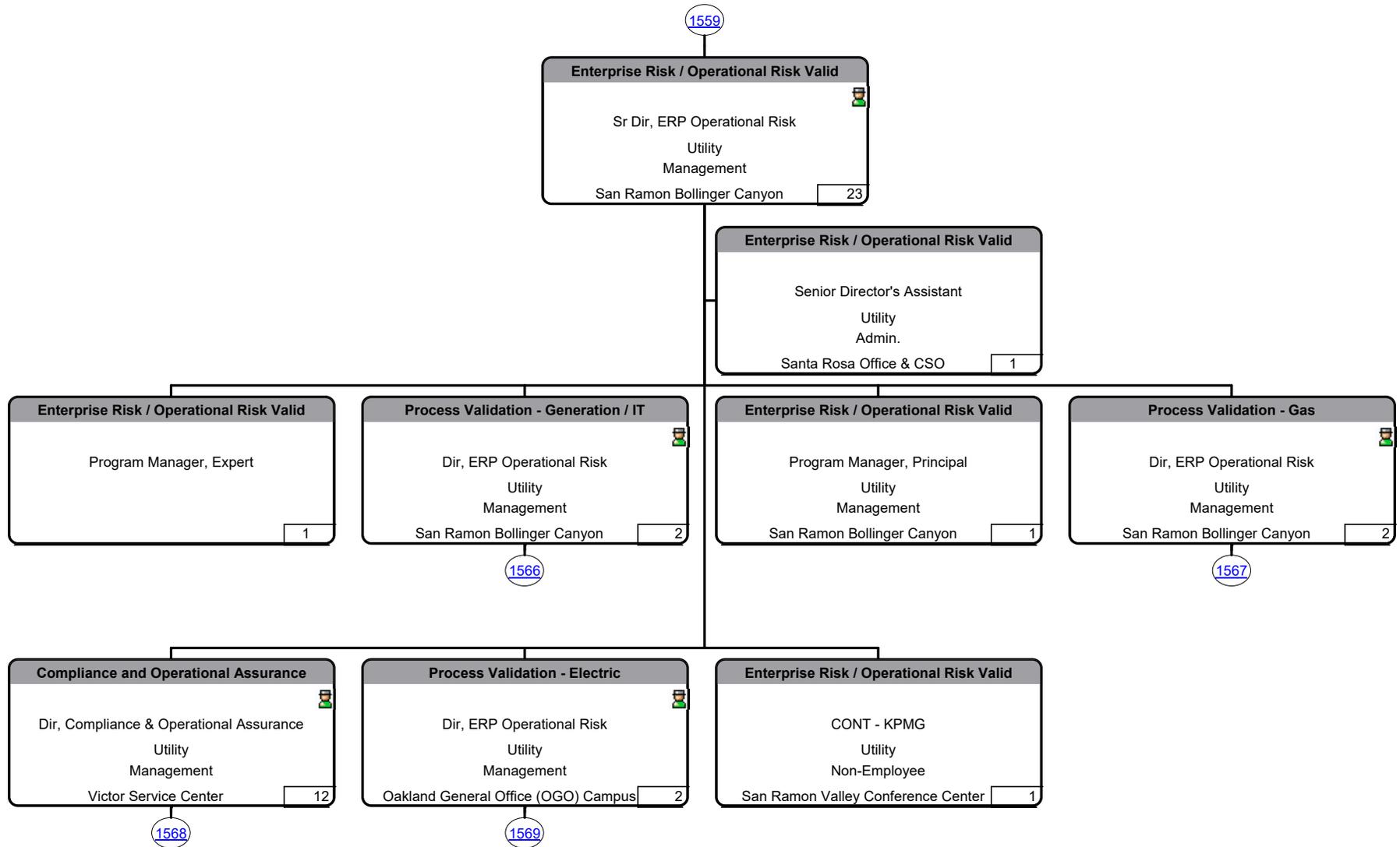
# Enterprise Risk Analytics



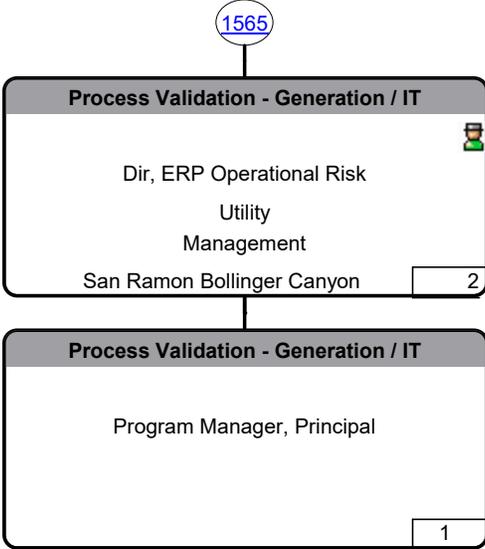
### EAM - System Safety And Risk Management



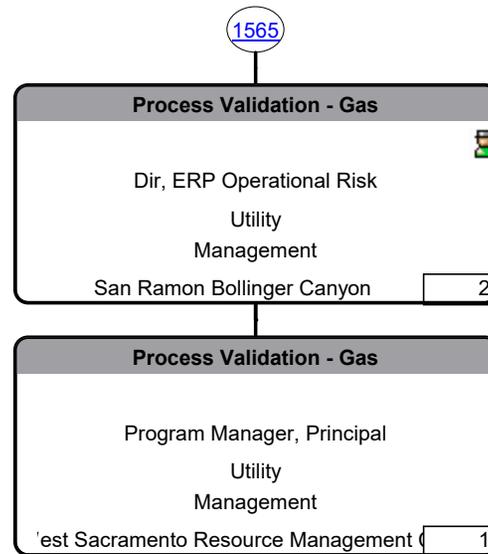
# Enterprise Risk / Operational Risk Valid



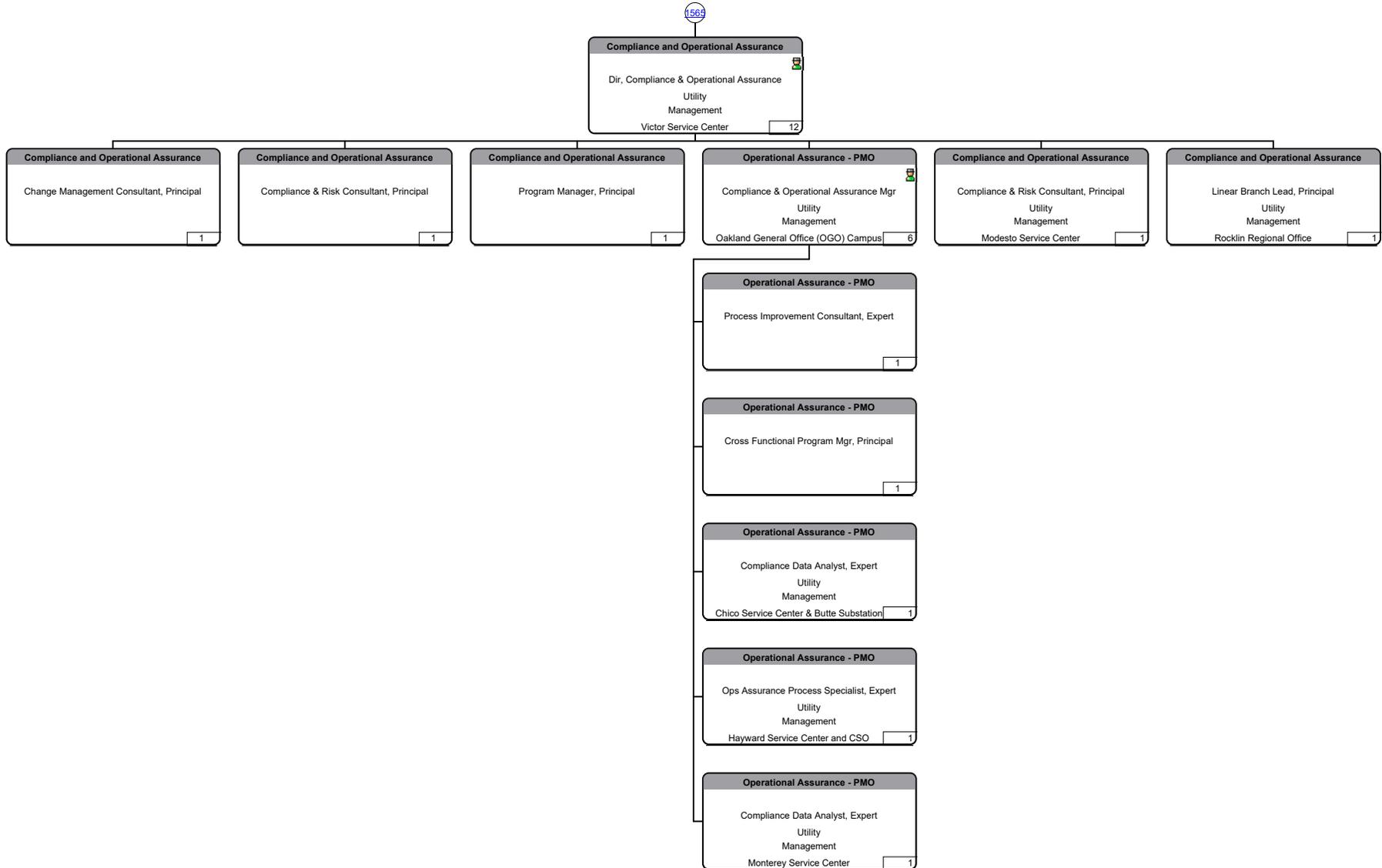
# Process Validation - Generation / IT



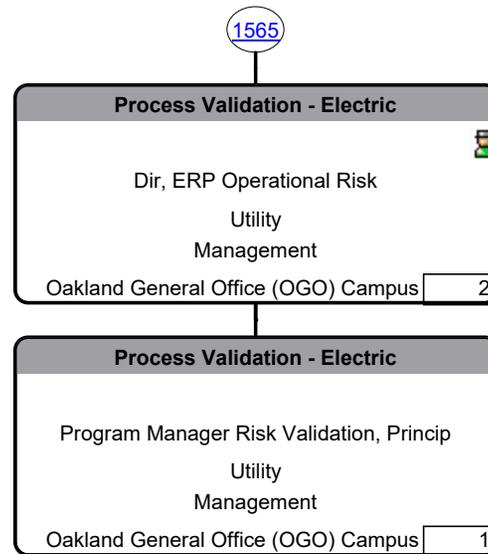
## Process Validation - Gas



### Compliance and Operational Assurance

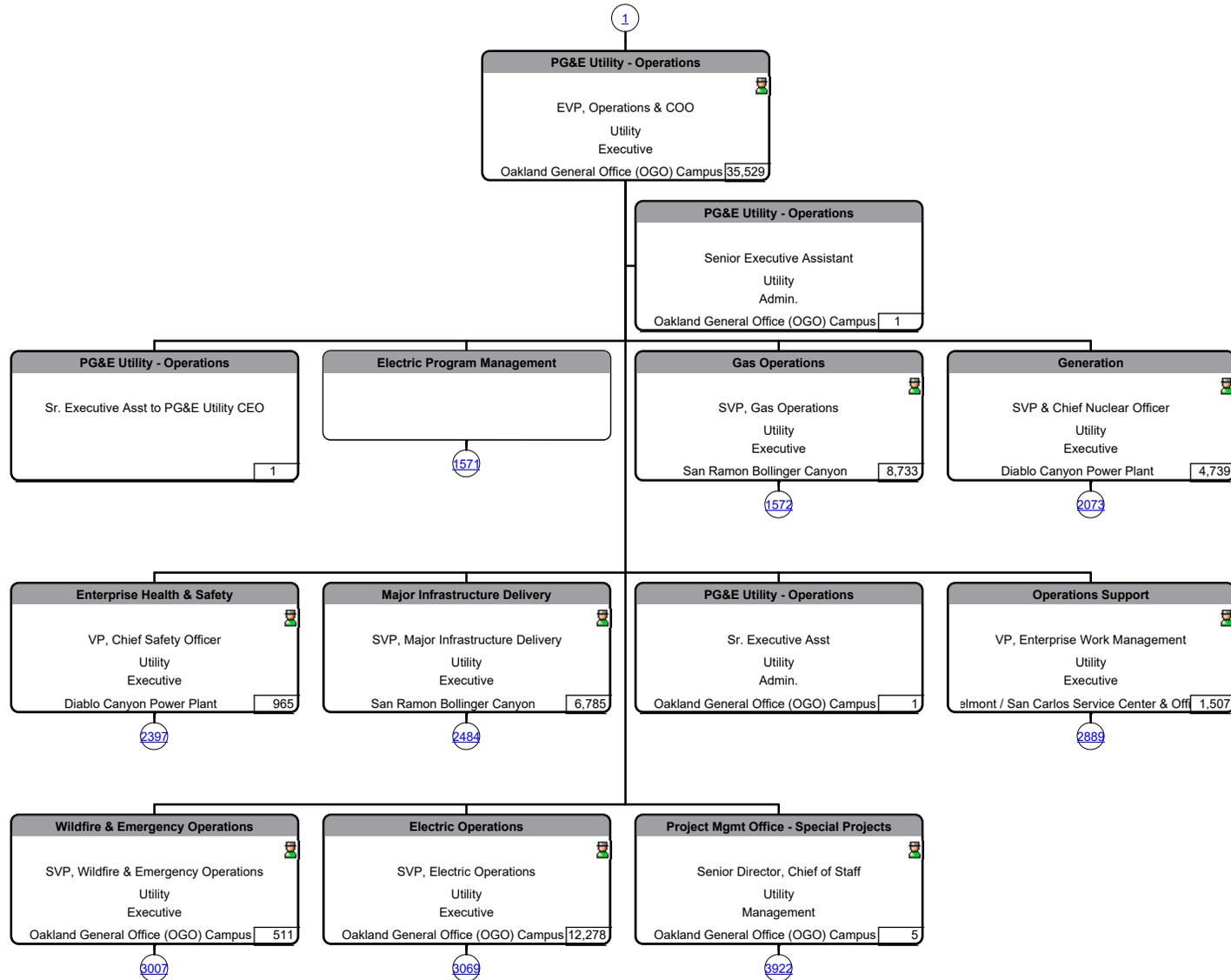


## Process Validation - Electric

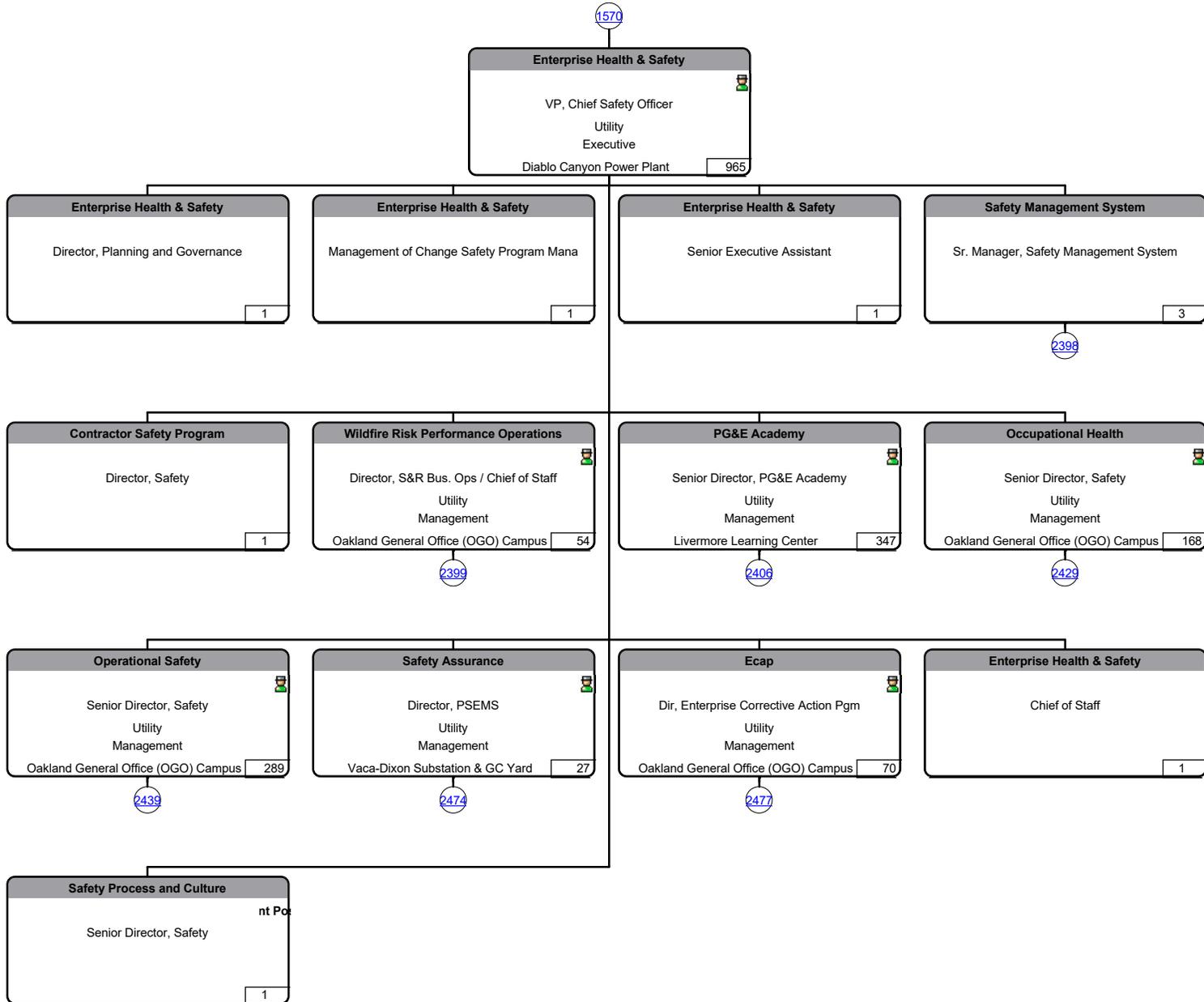


PG&E Utility - Operations  
**PG&E Utility - Operations**

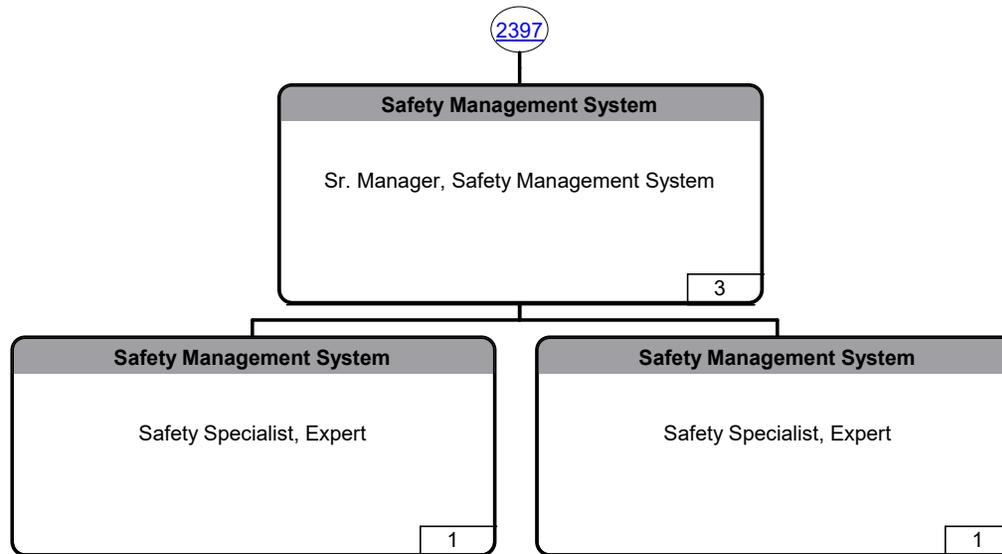
PG&E Organization as of 08/31/2023



# Enterprise Health & Safety

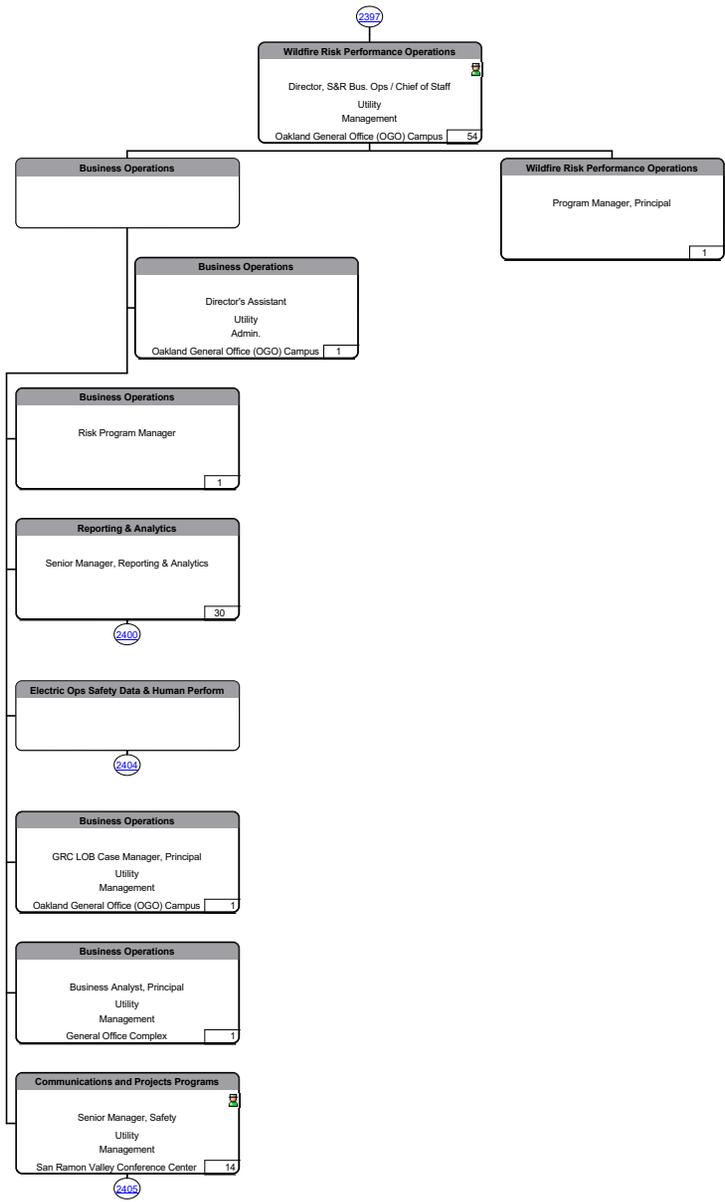


# Safety Management System

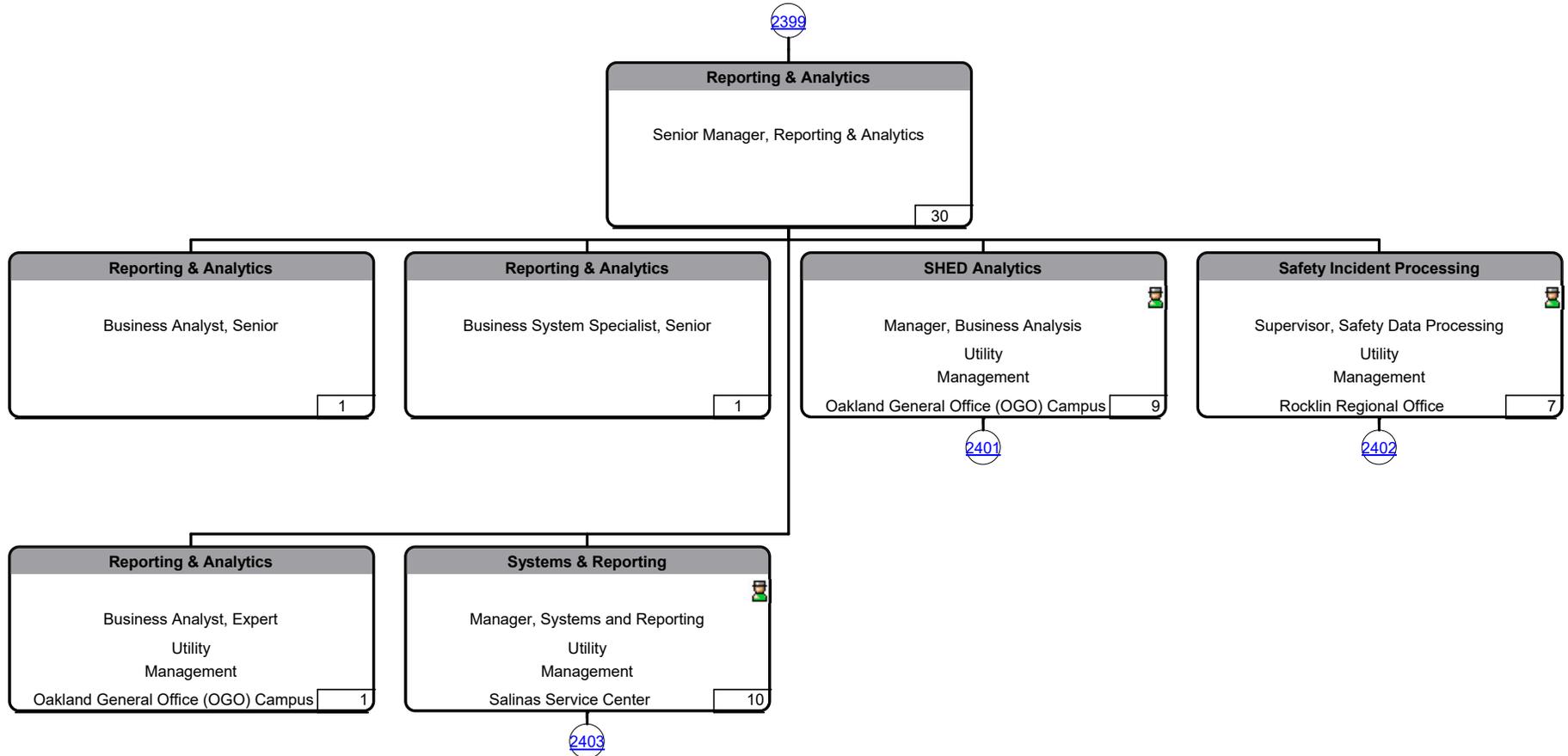


# Wildfire Risk Performance Operations

## Wildfire Risk Performance Operations

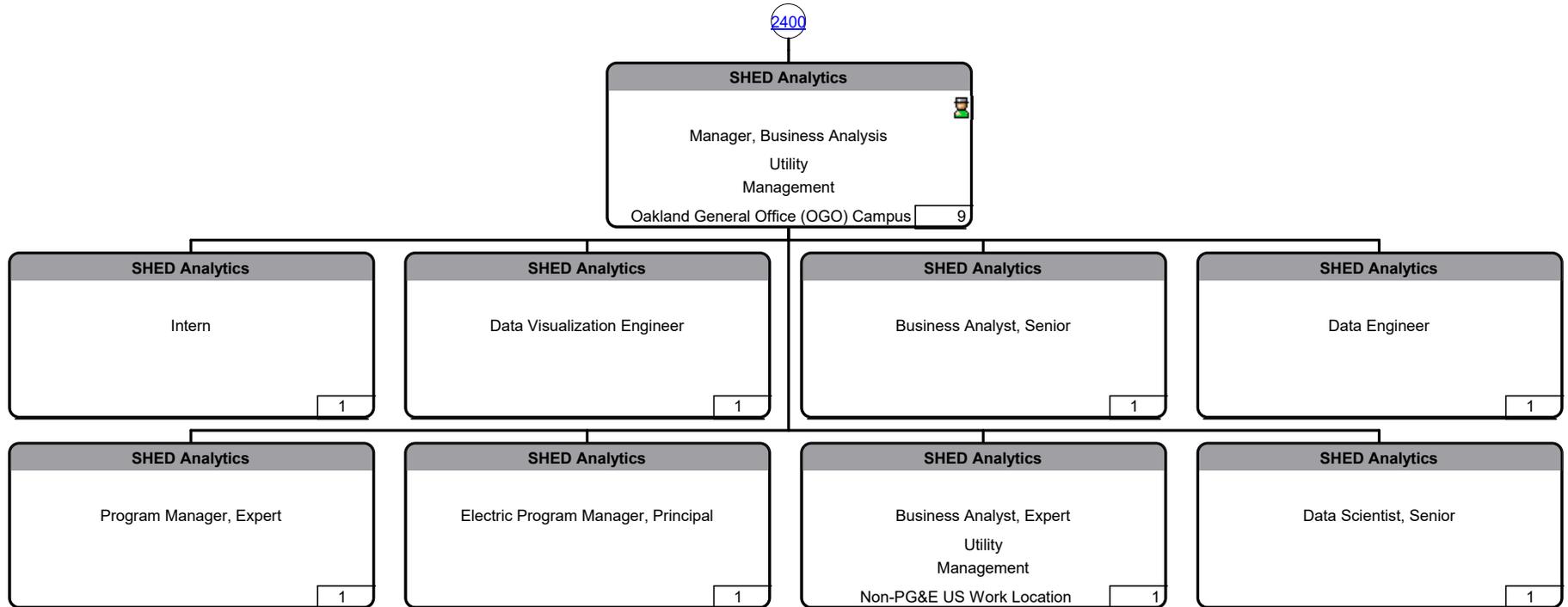


# Reporting & Analytics

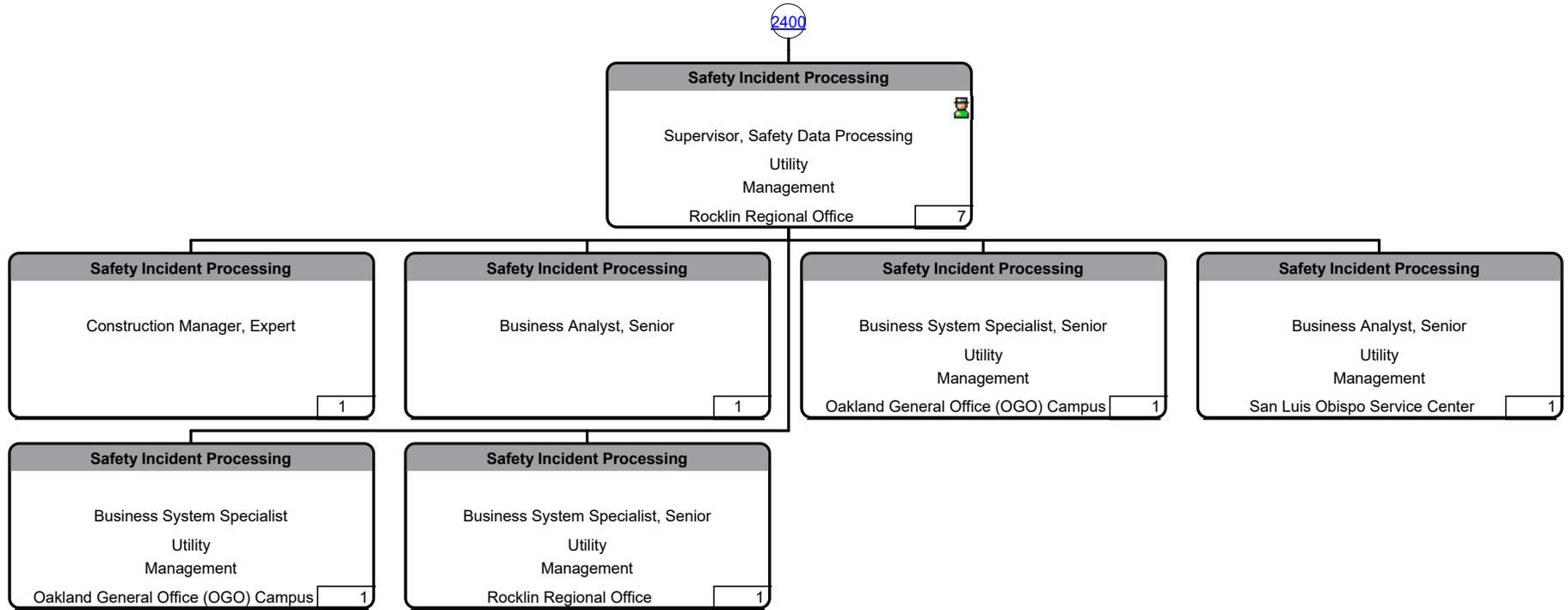


# SHED Analytics

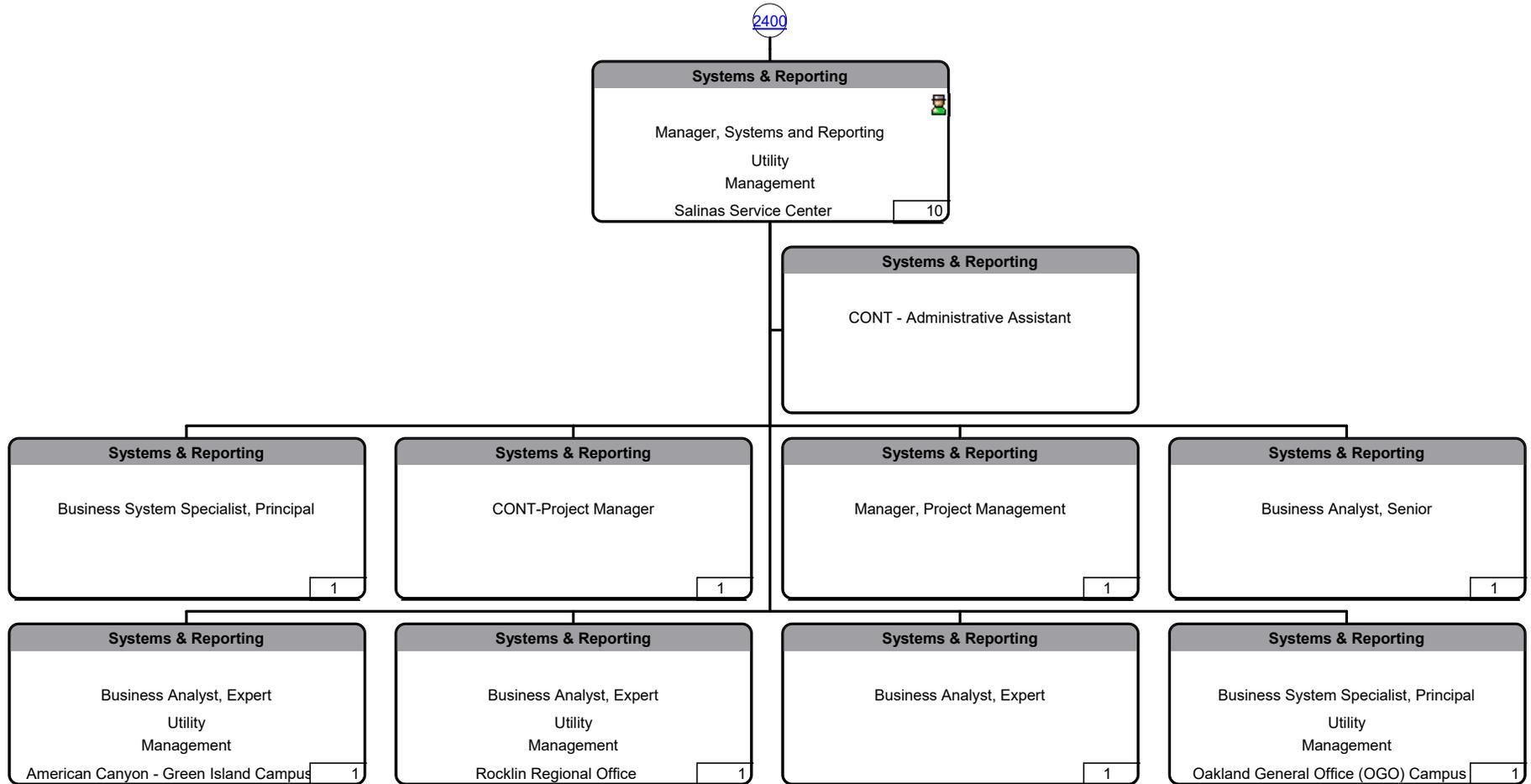
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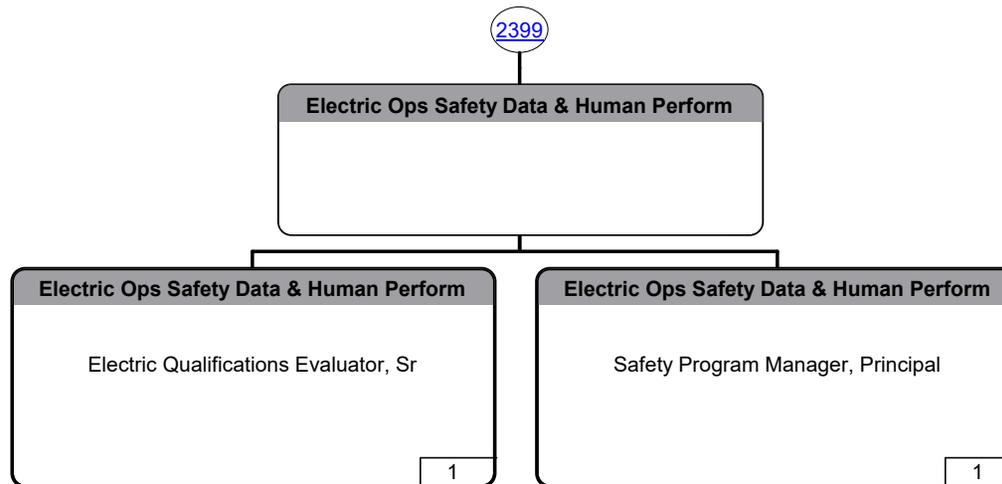
# Safety Incident Processing



# Systems & Reporting

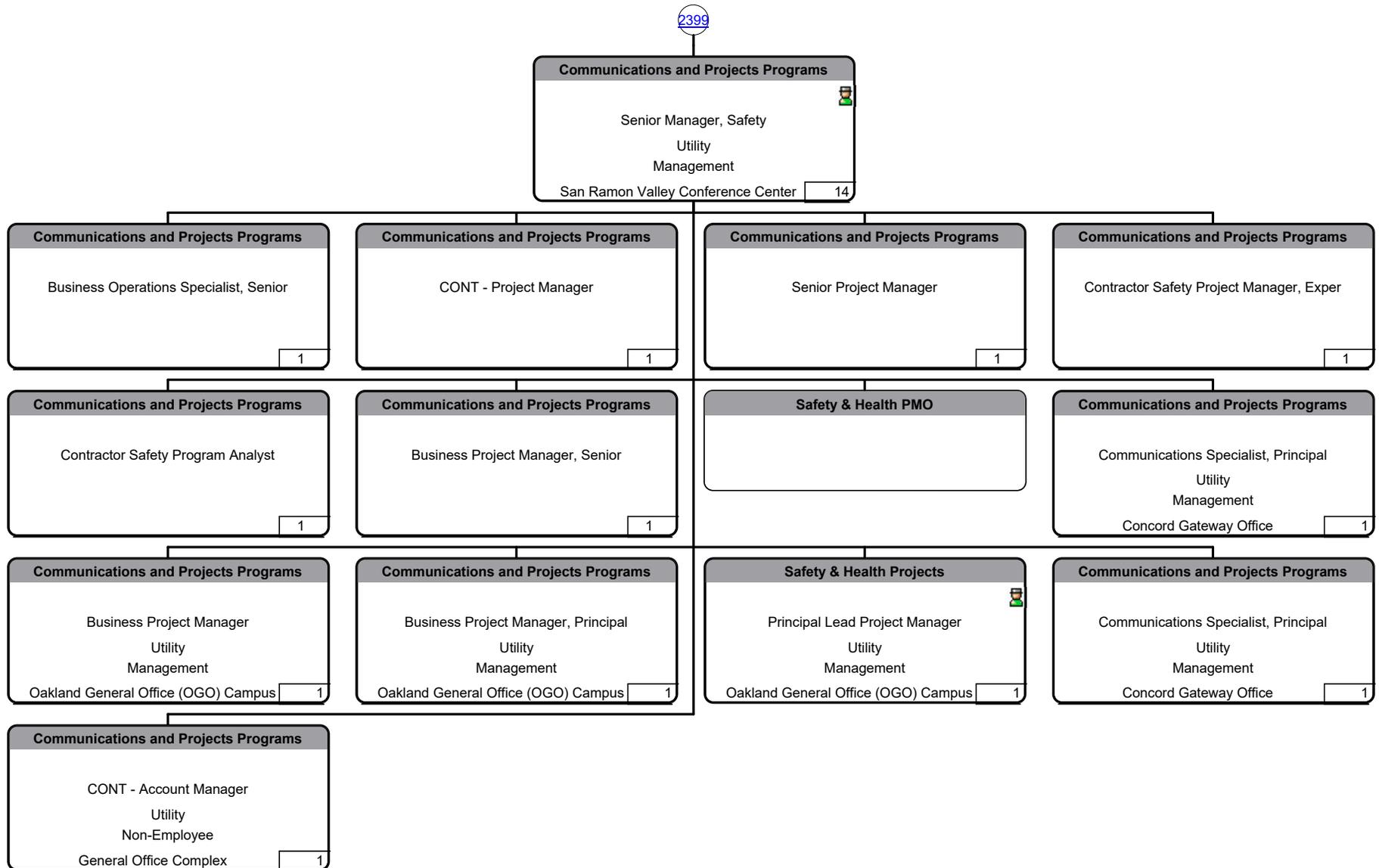


## Electric Ops Safety Data & Human Perform

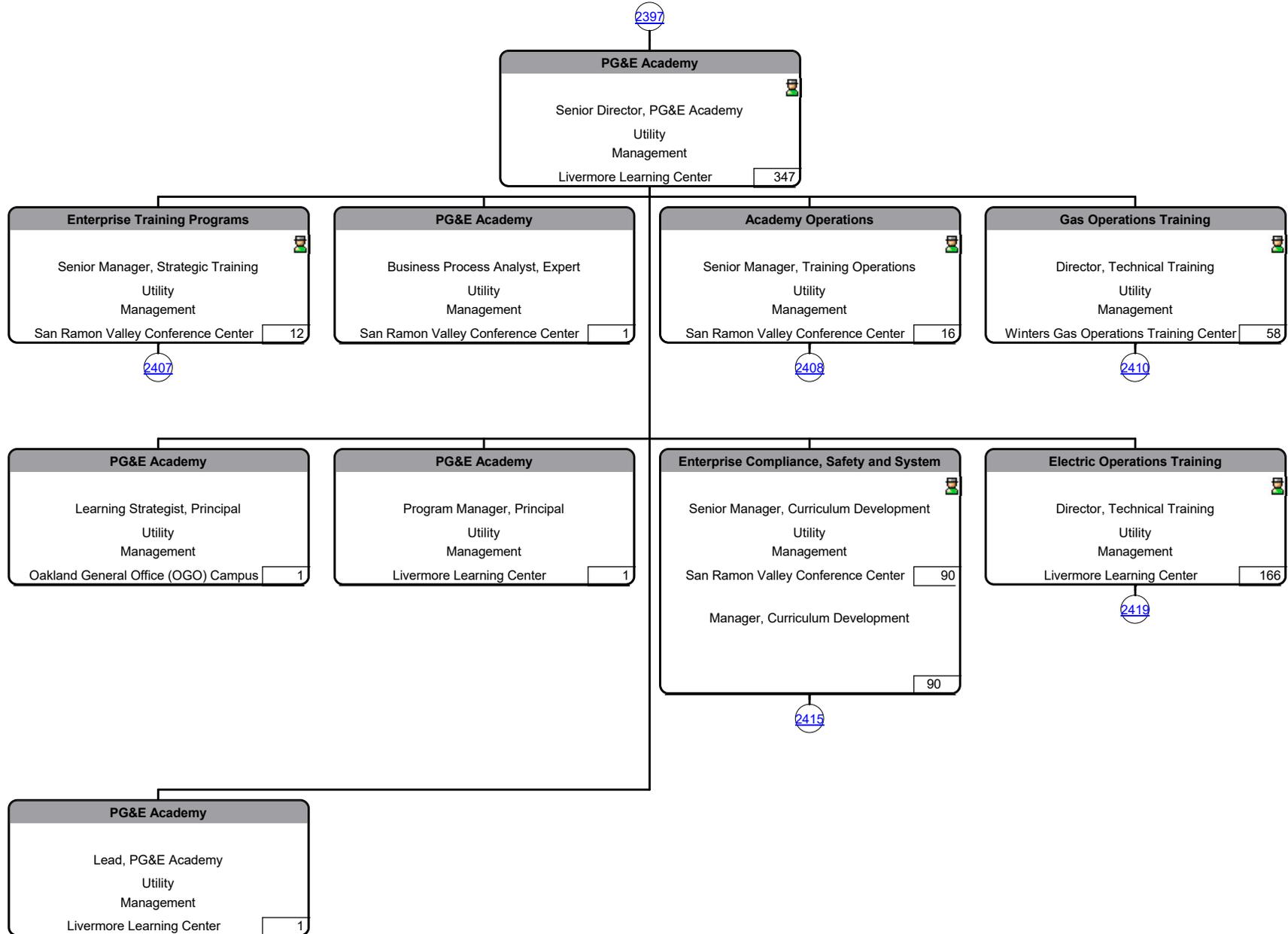


# Communications and Projects Programs

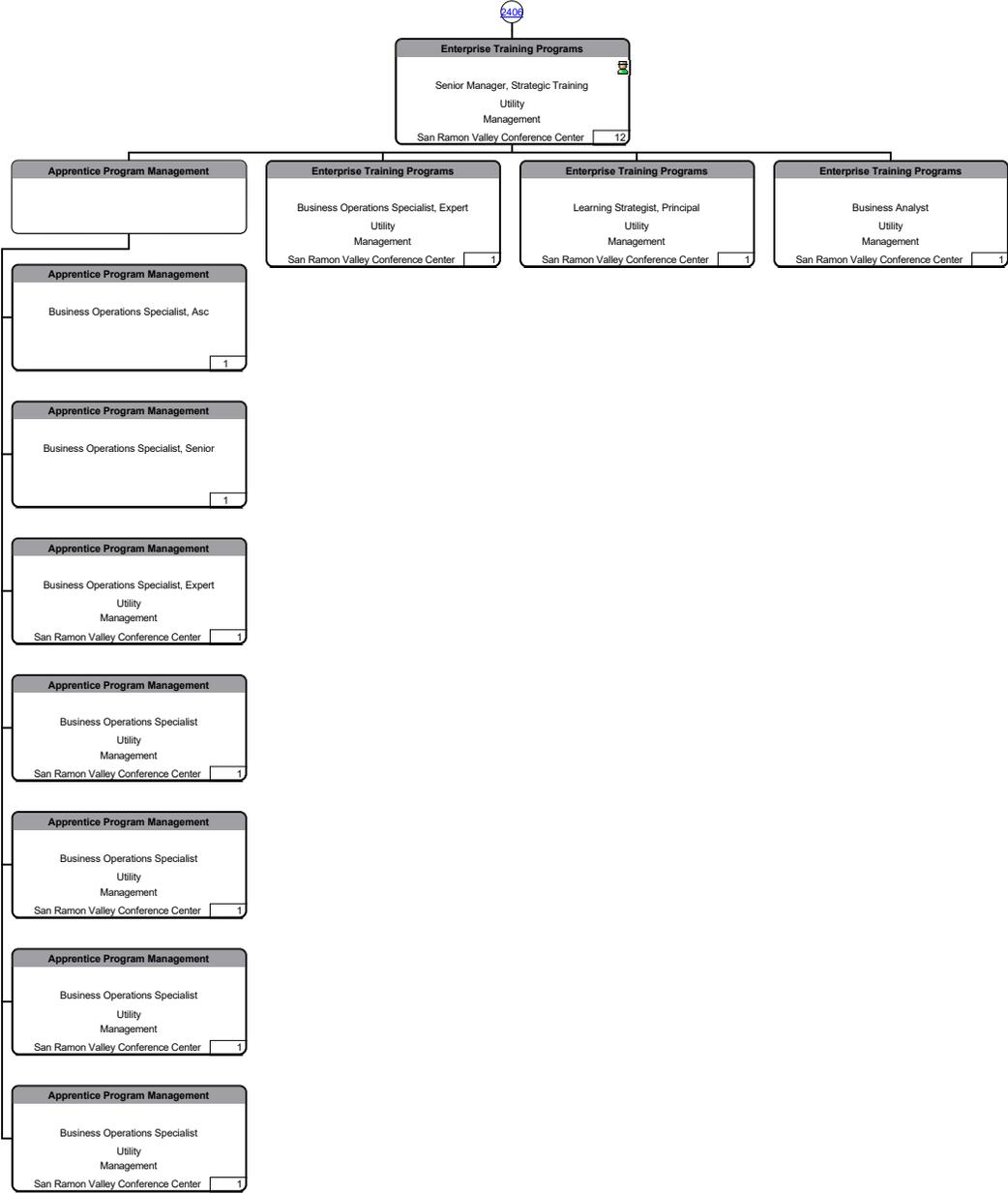
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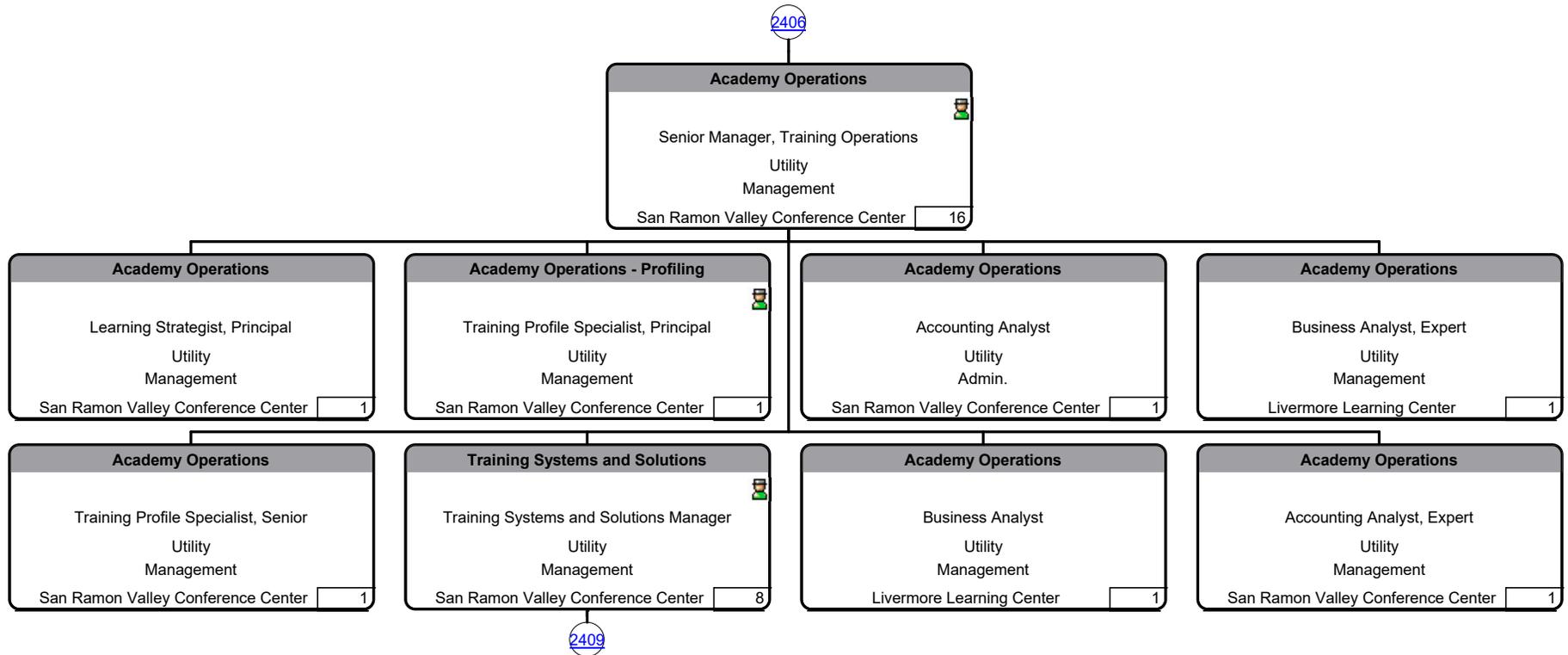
# PG&E Academy



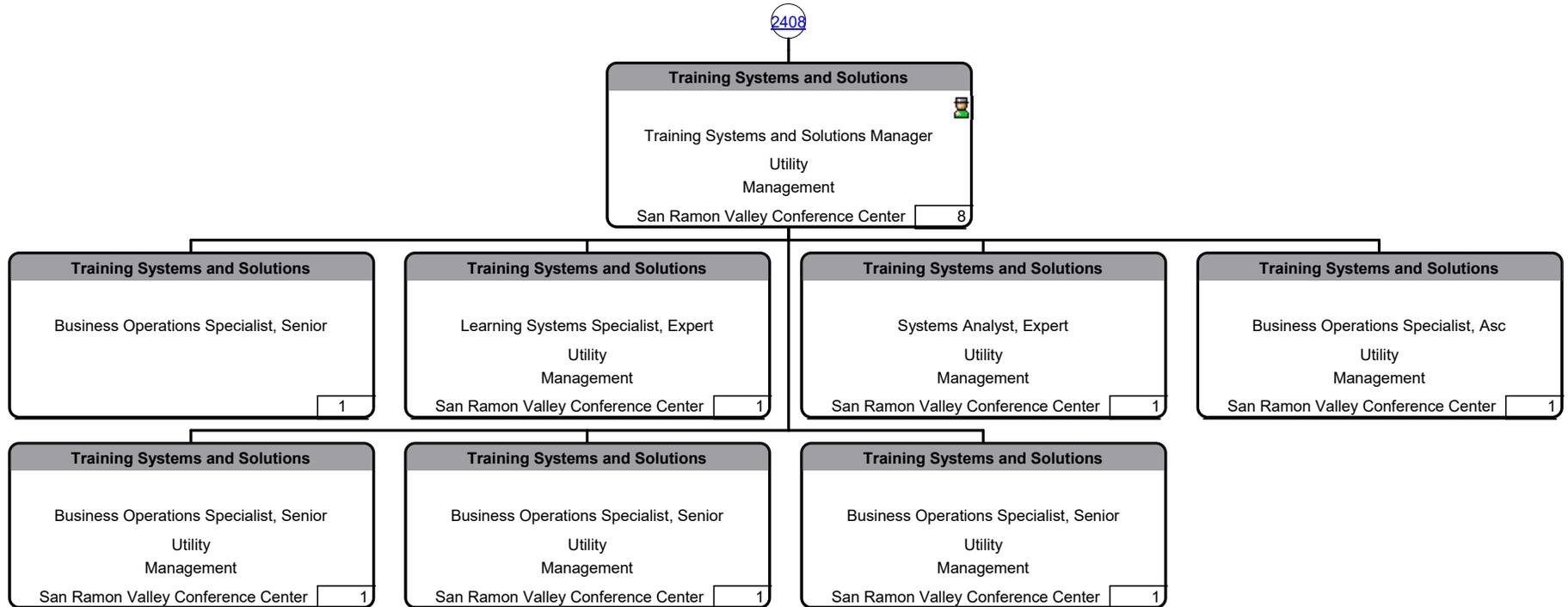
# Enterprise Training Programs Enterprise Training Programs



# Academy Operations

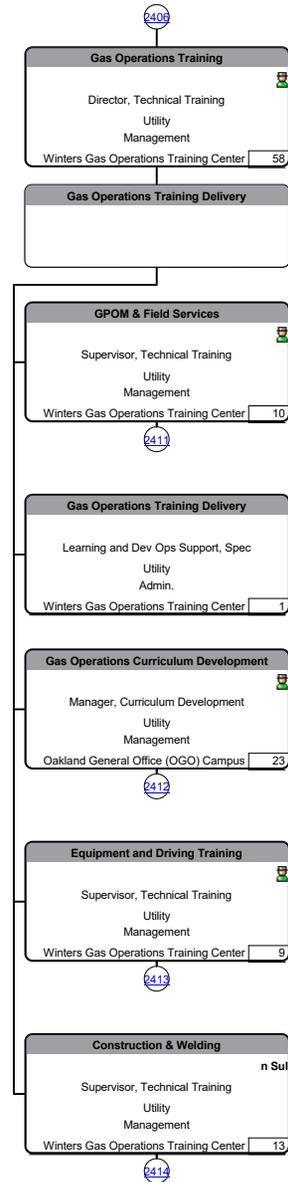


# Training Systems and Solutions

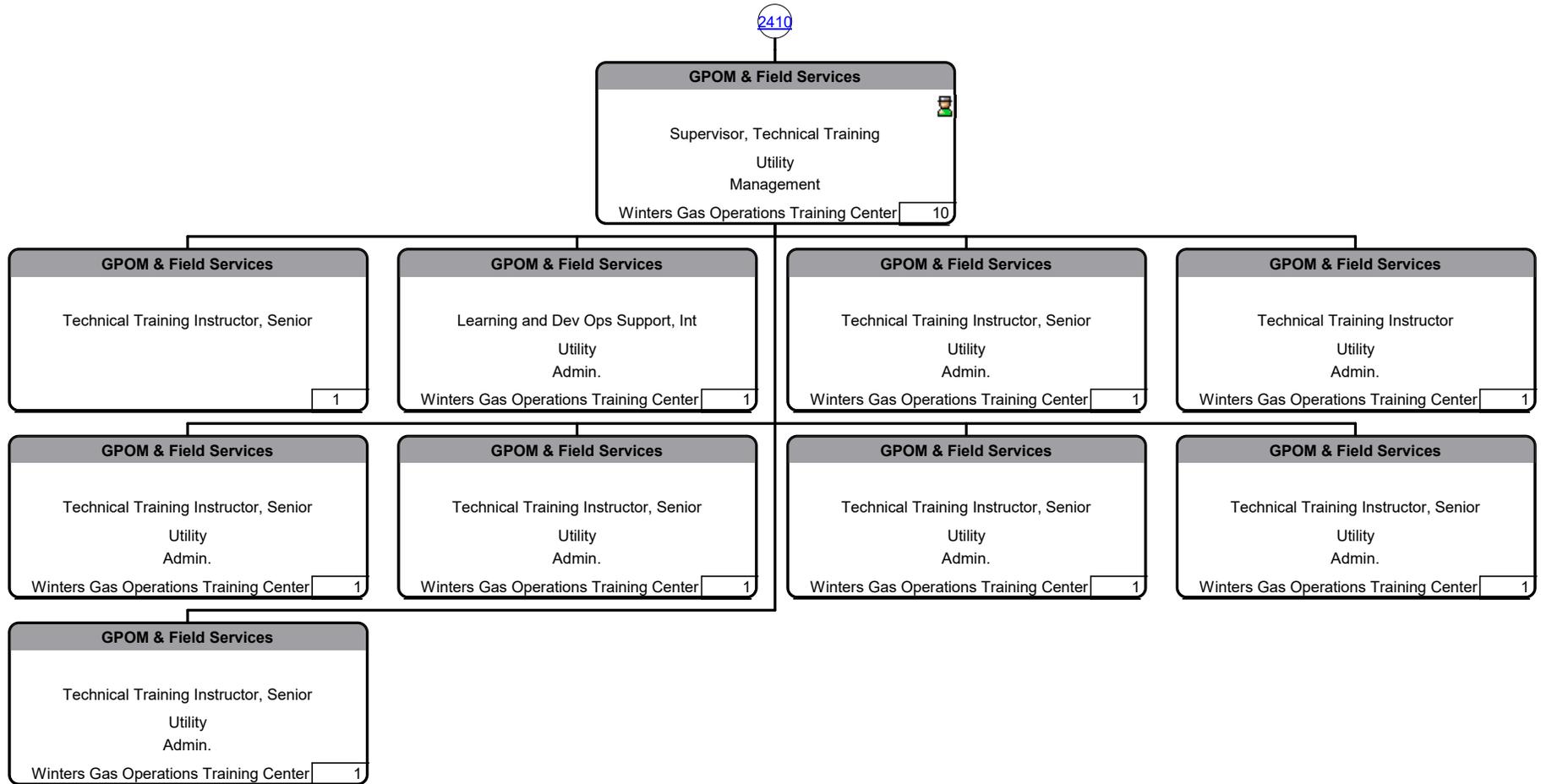


# Gas Operations Training

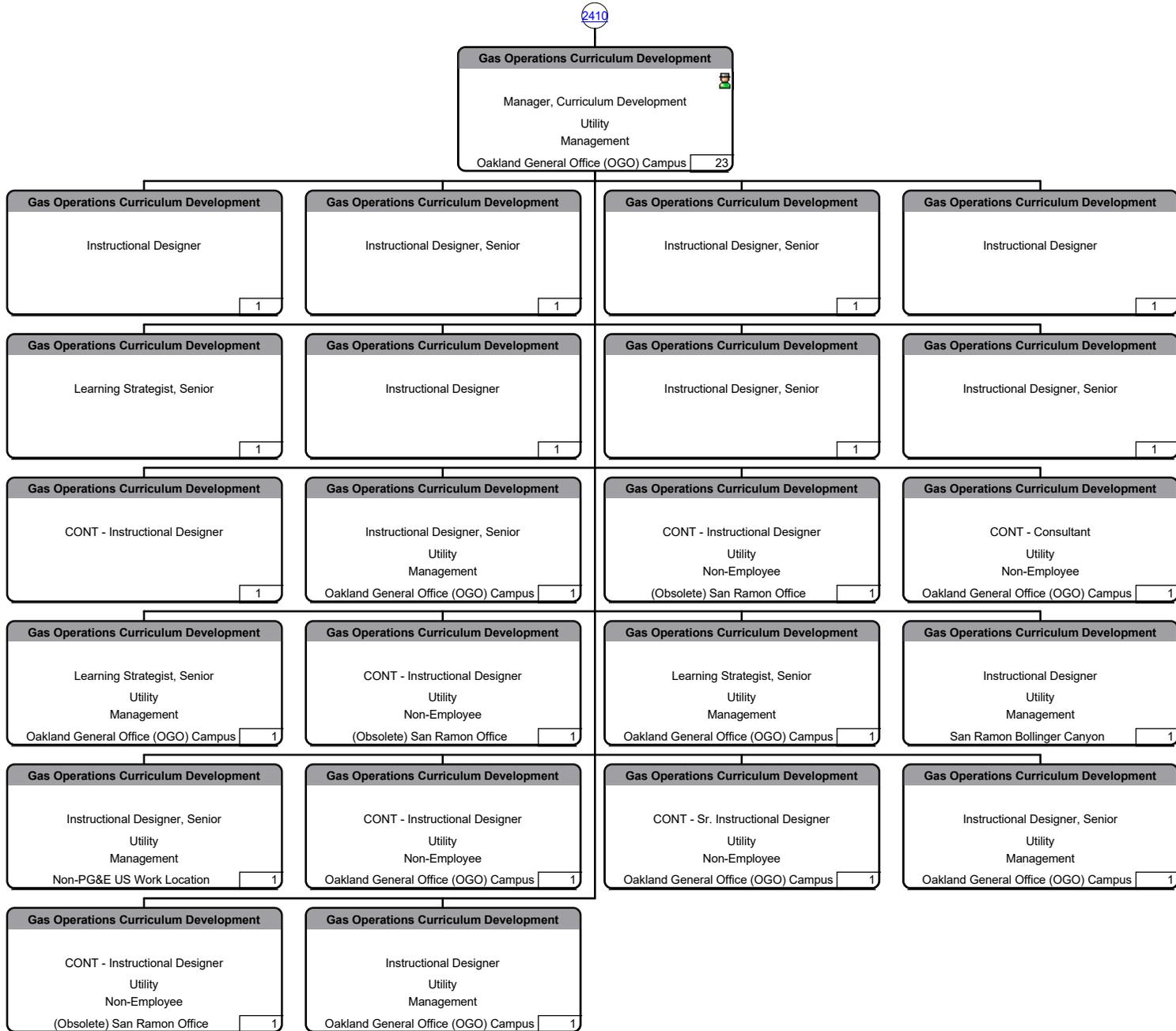
## Gas Operations Training



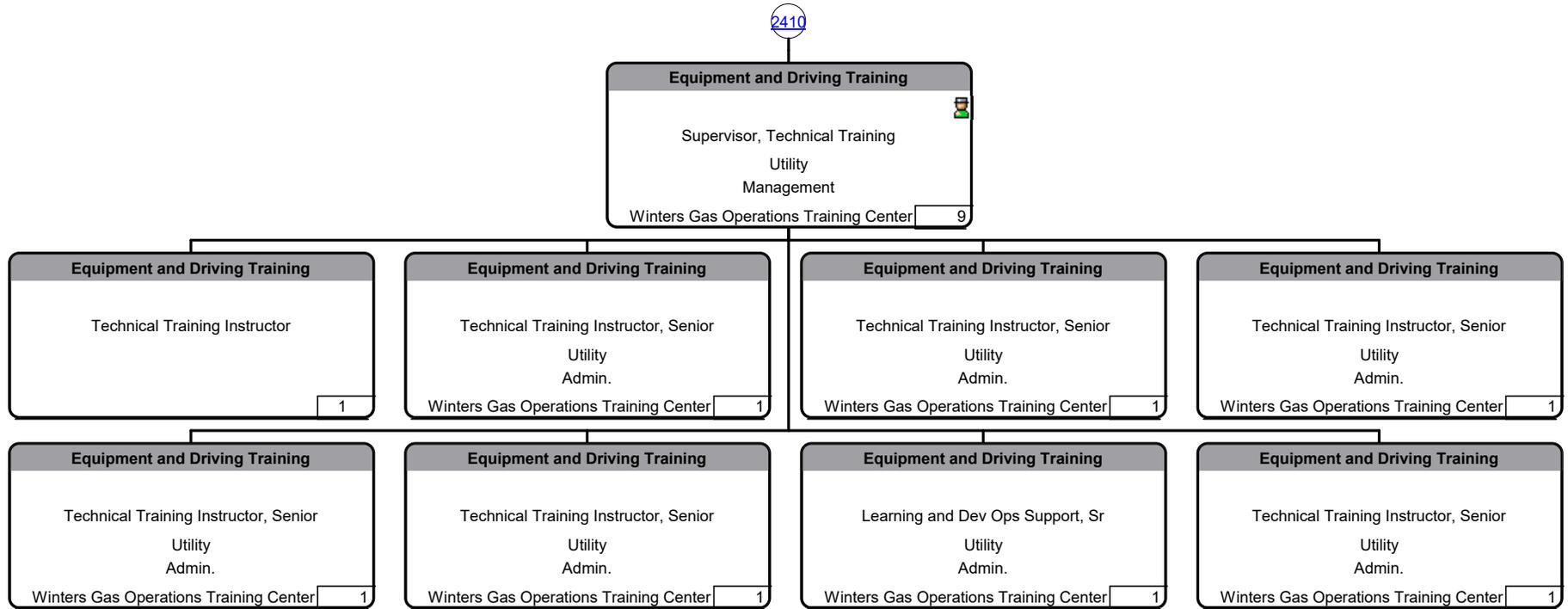
### GPOM & Field Services



Gas Operations Curriculum Development  
**Gas Operations Curriculum Development**

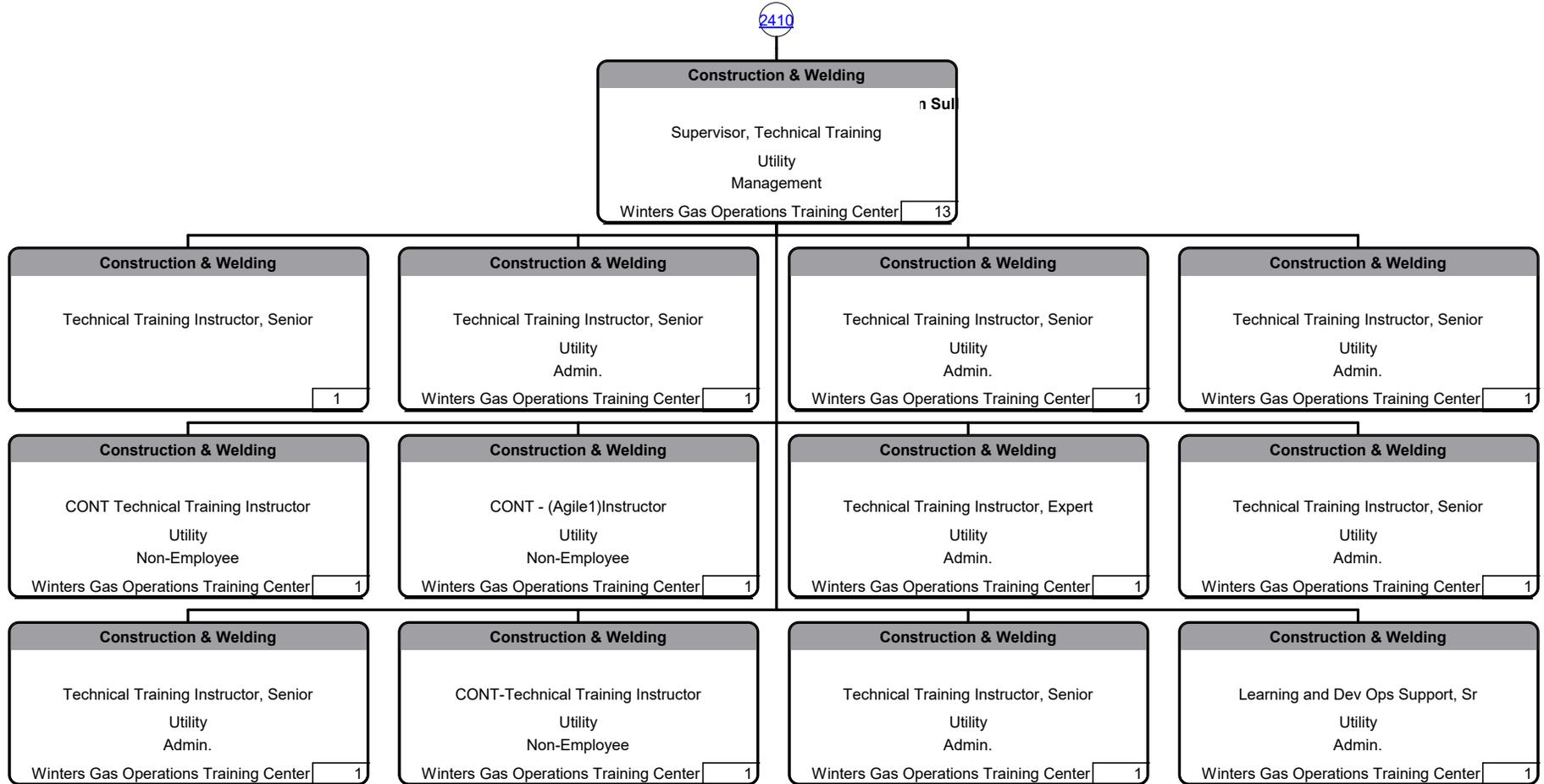


# Equipment and Driving Training

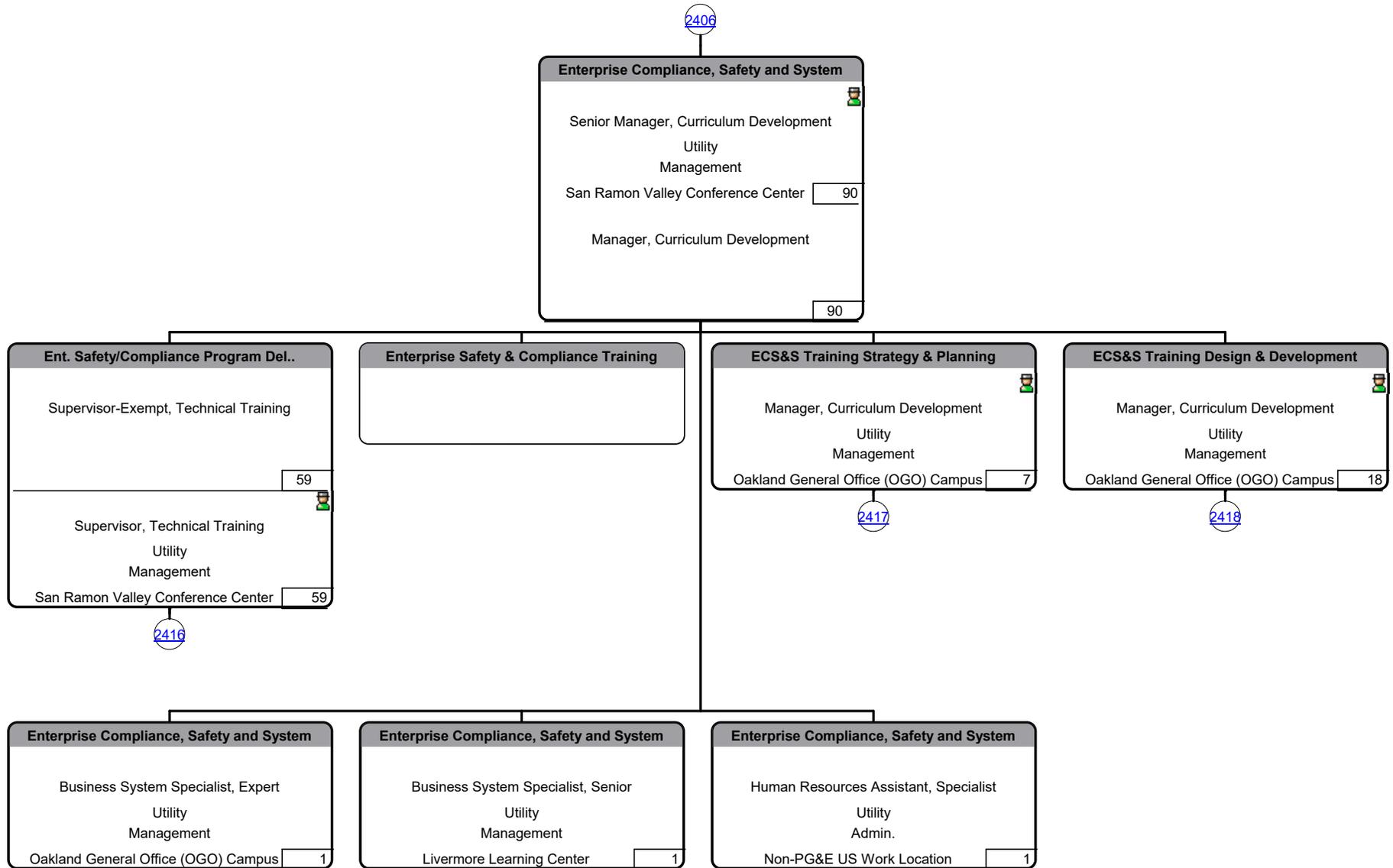


# Construction & Welding

2410

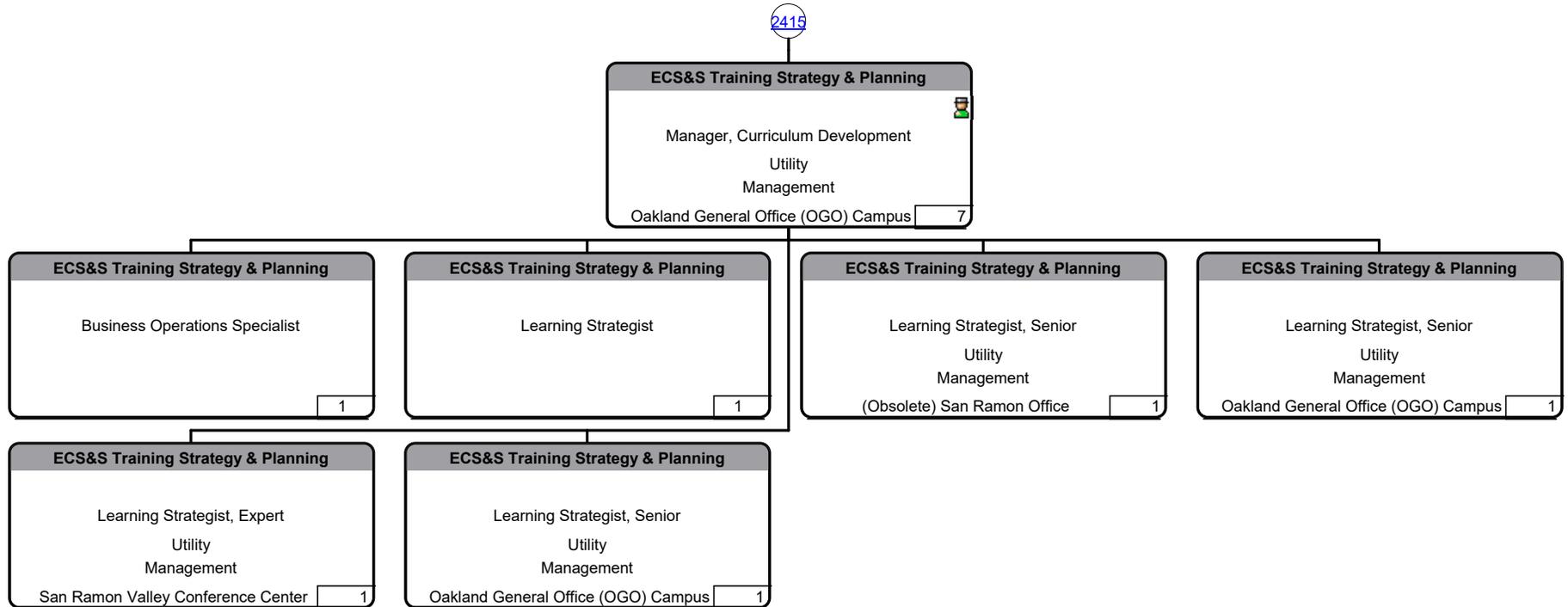


# Enterprise Compliance, Safety and System

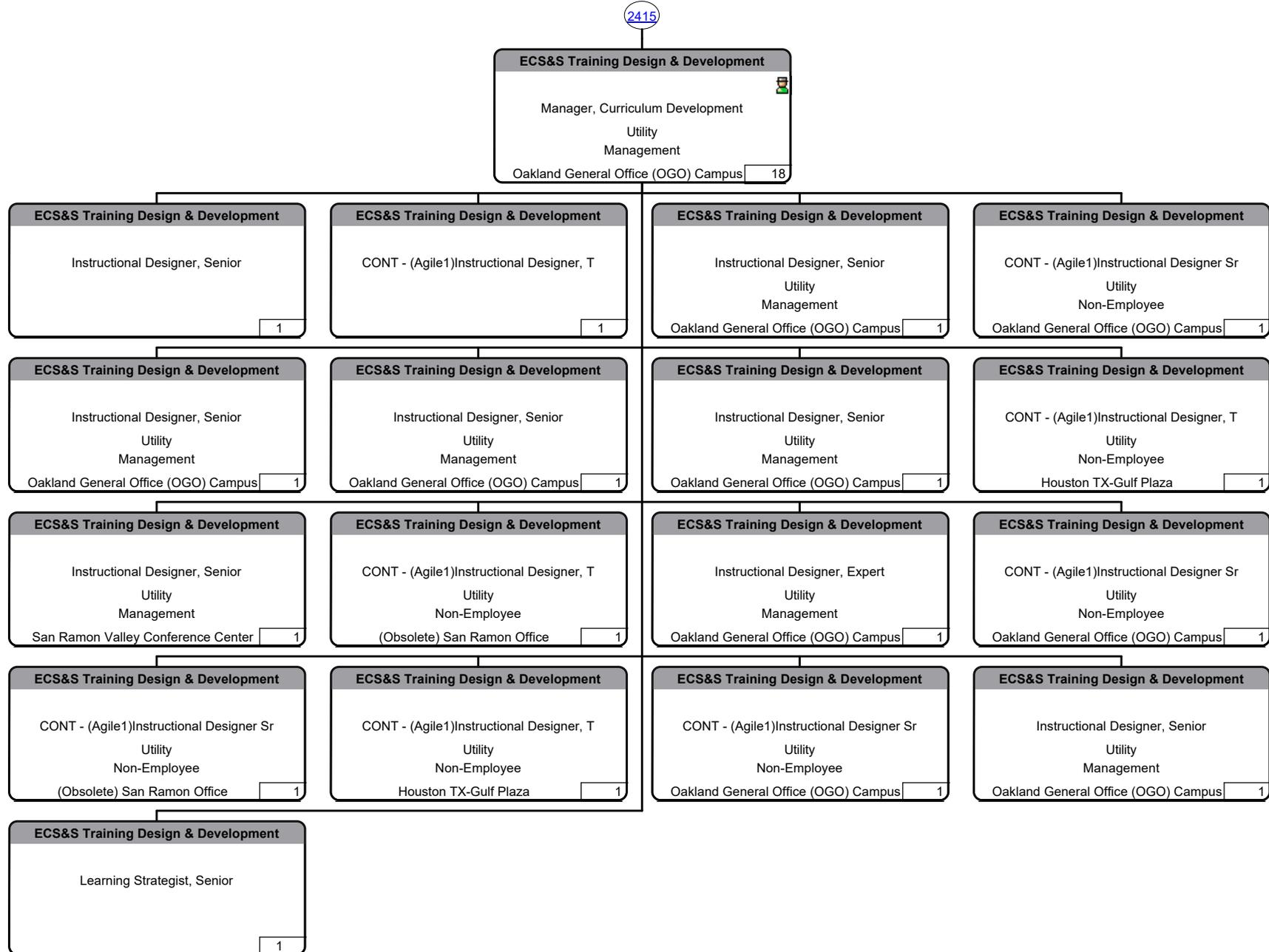




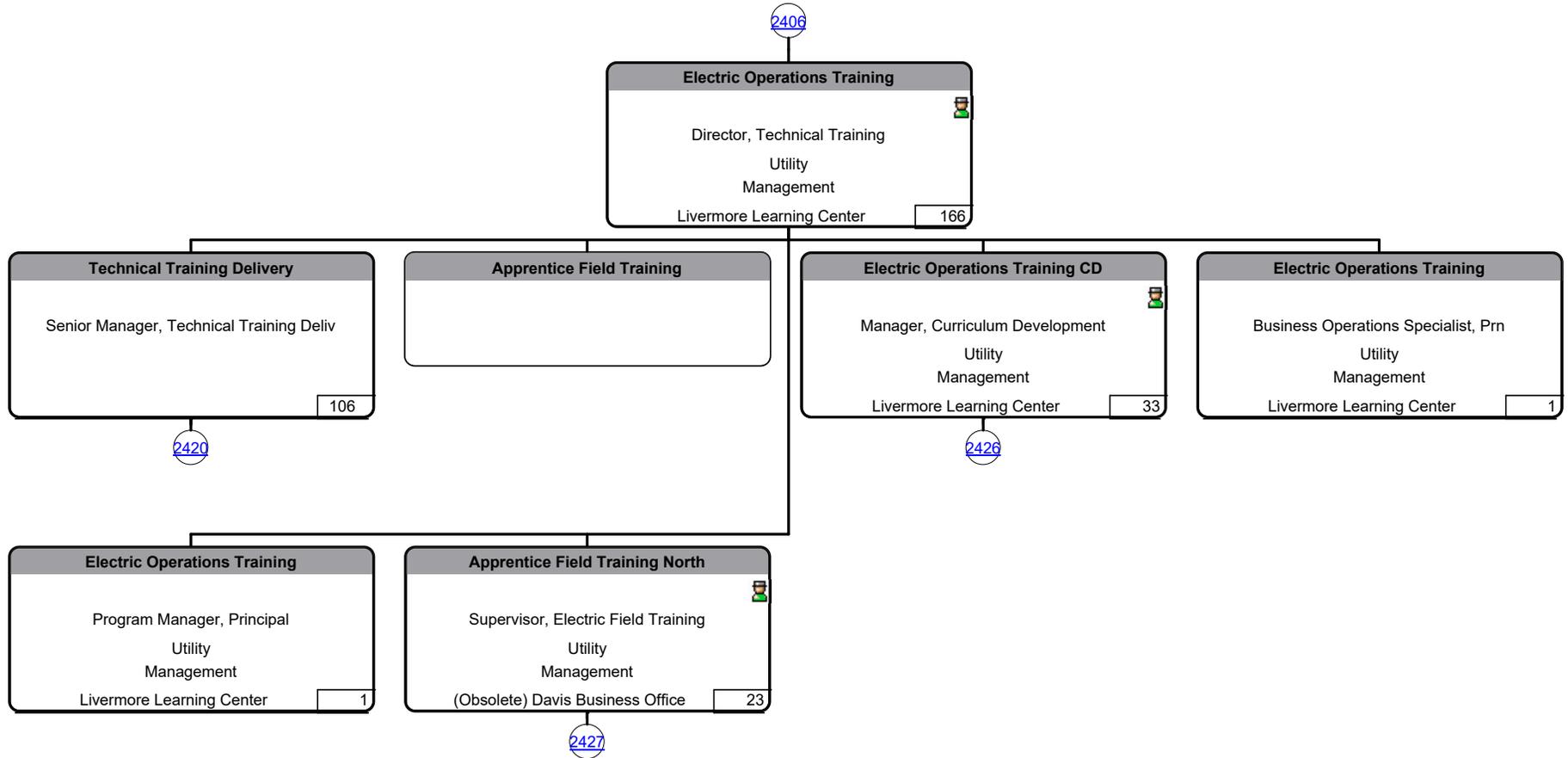
## ECS&S Training Strategy & Planning



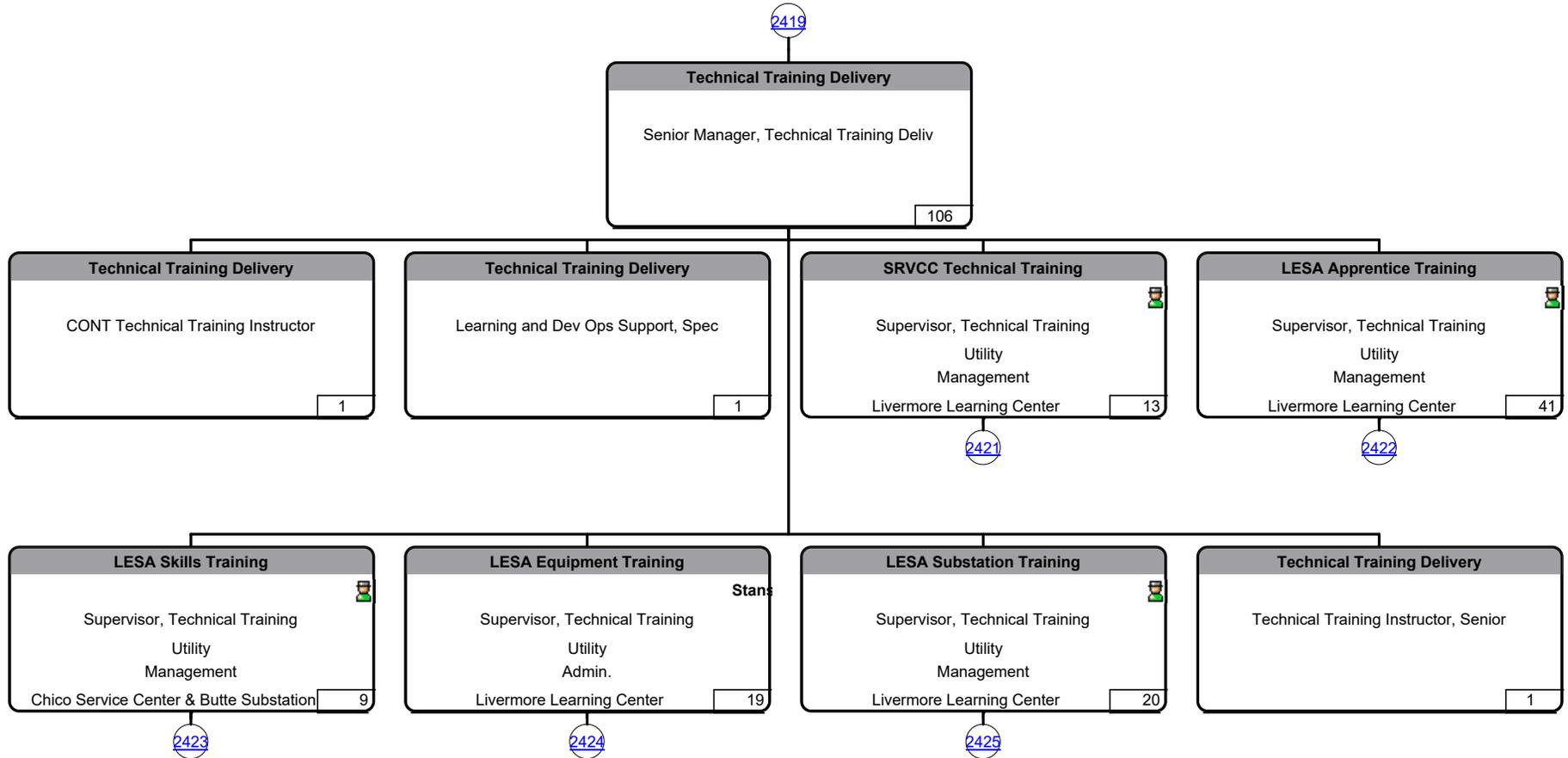
# ECS&S Training Design & Development



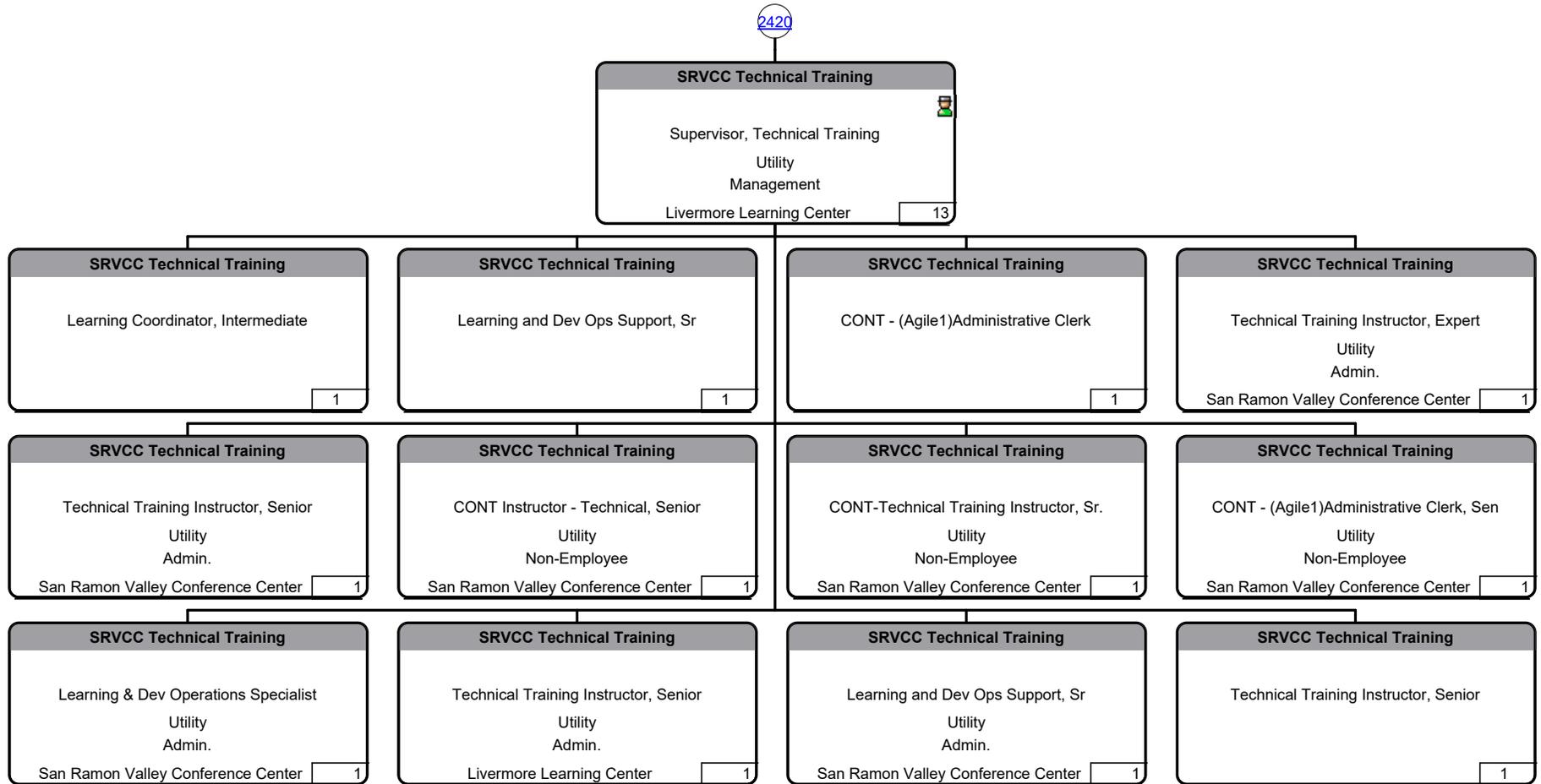
# Electric Operations Training



# Technical Training Delivery



# SRVCC Technical Training



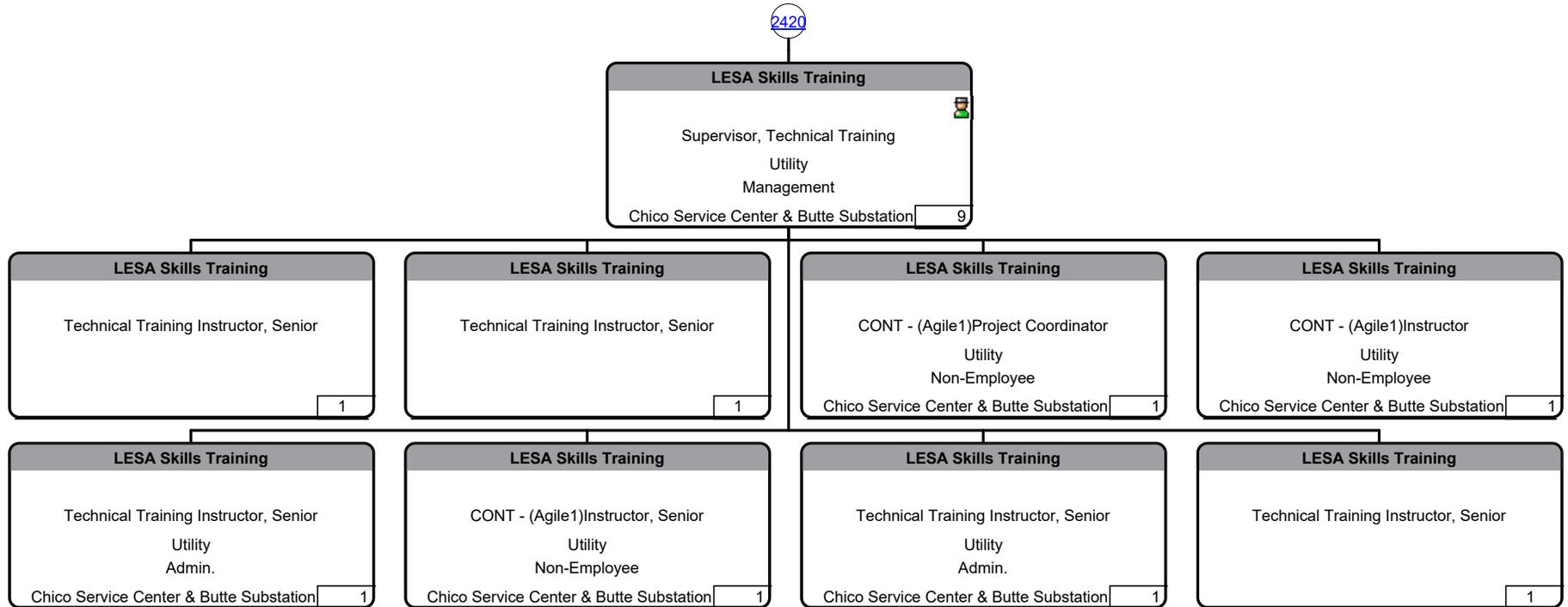
# LESA Apprentice Training

## LESA Apprentice Training



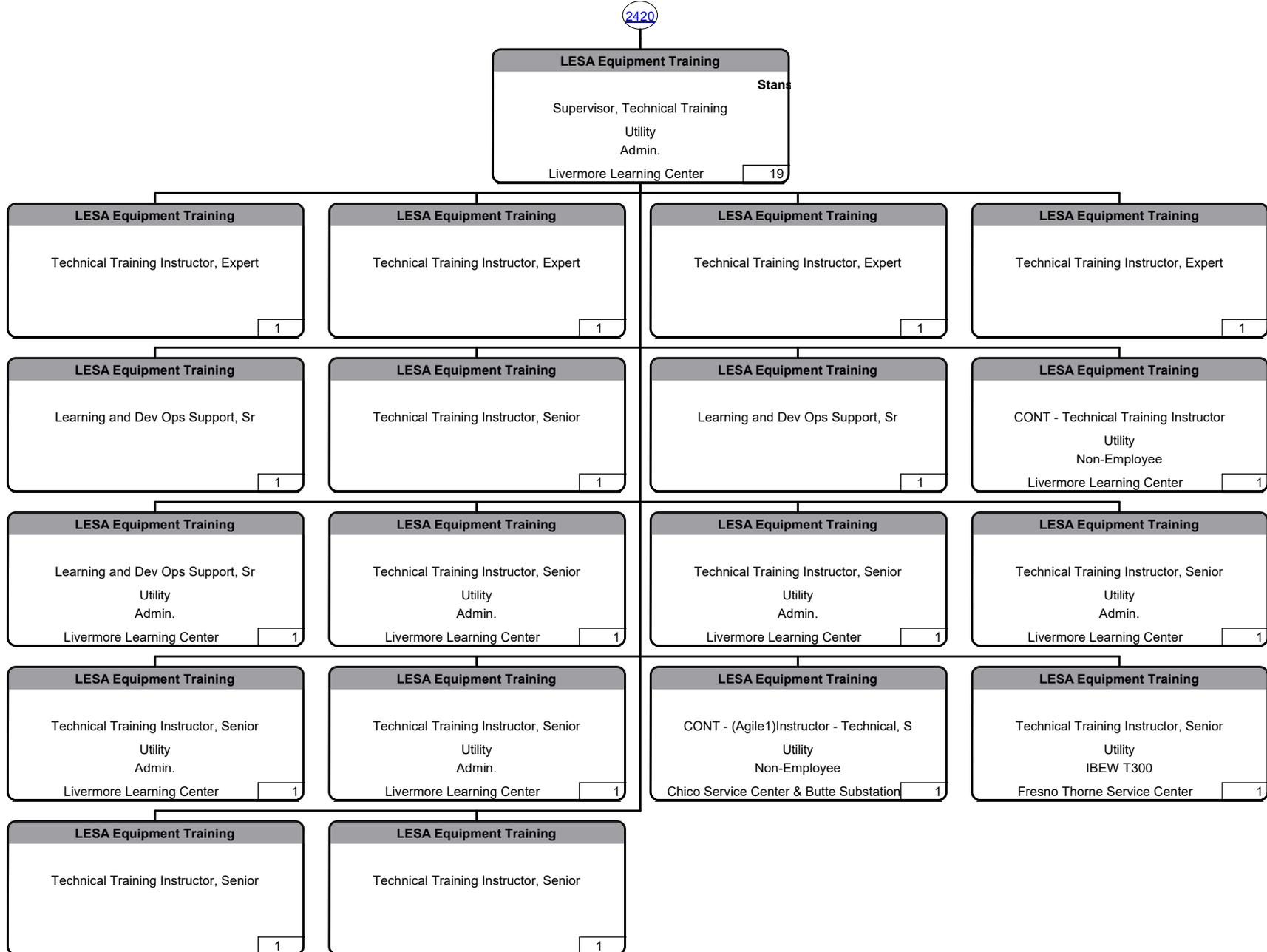
# LESA Skills Training

2420



# LESA Equipment Training

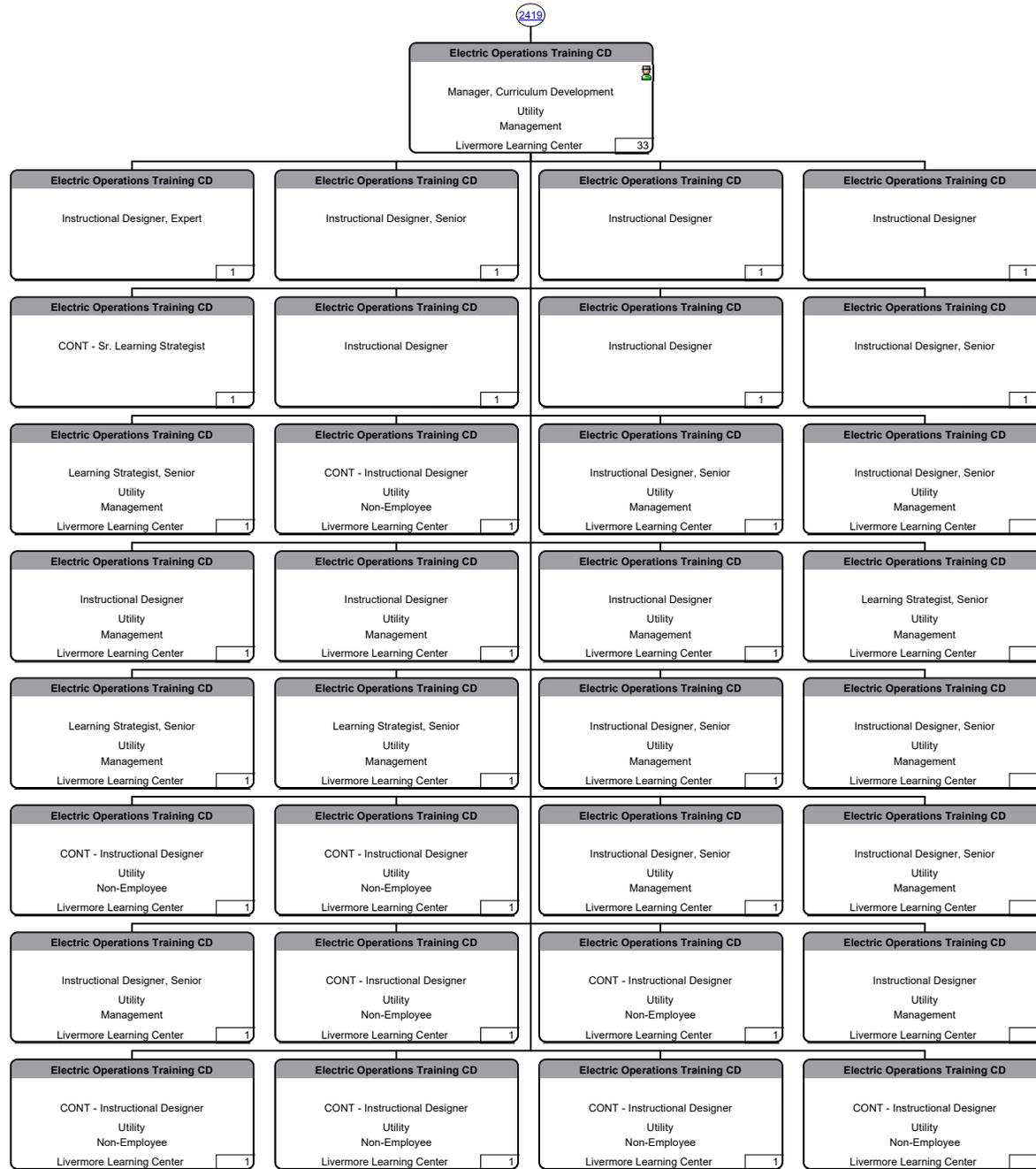
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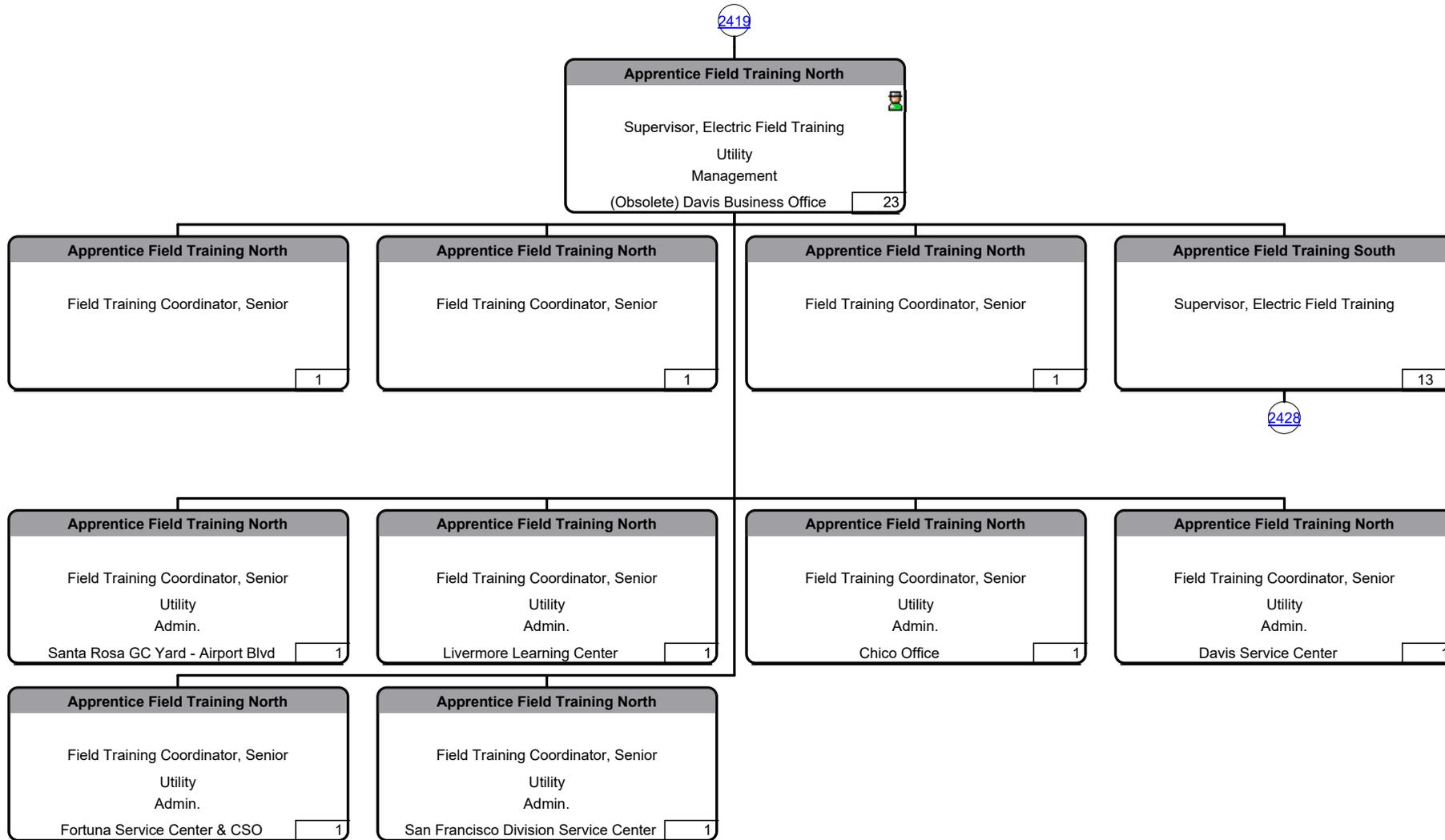


# Electric Operations Training CD

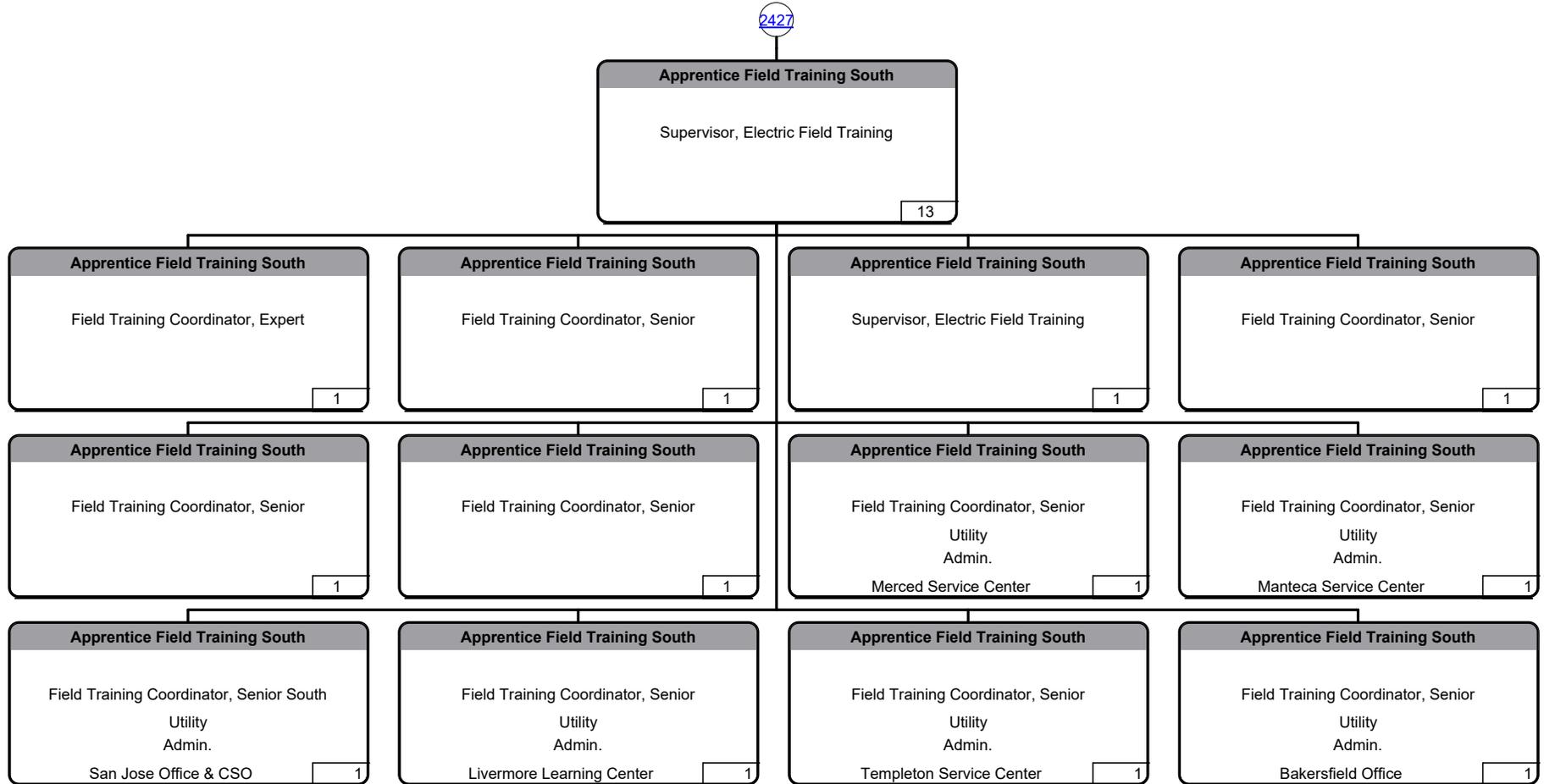
## Electric Operations Training CD



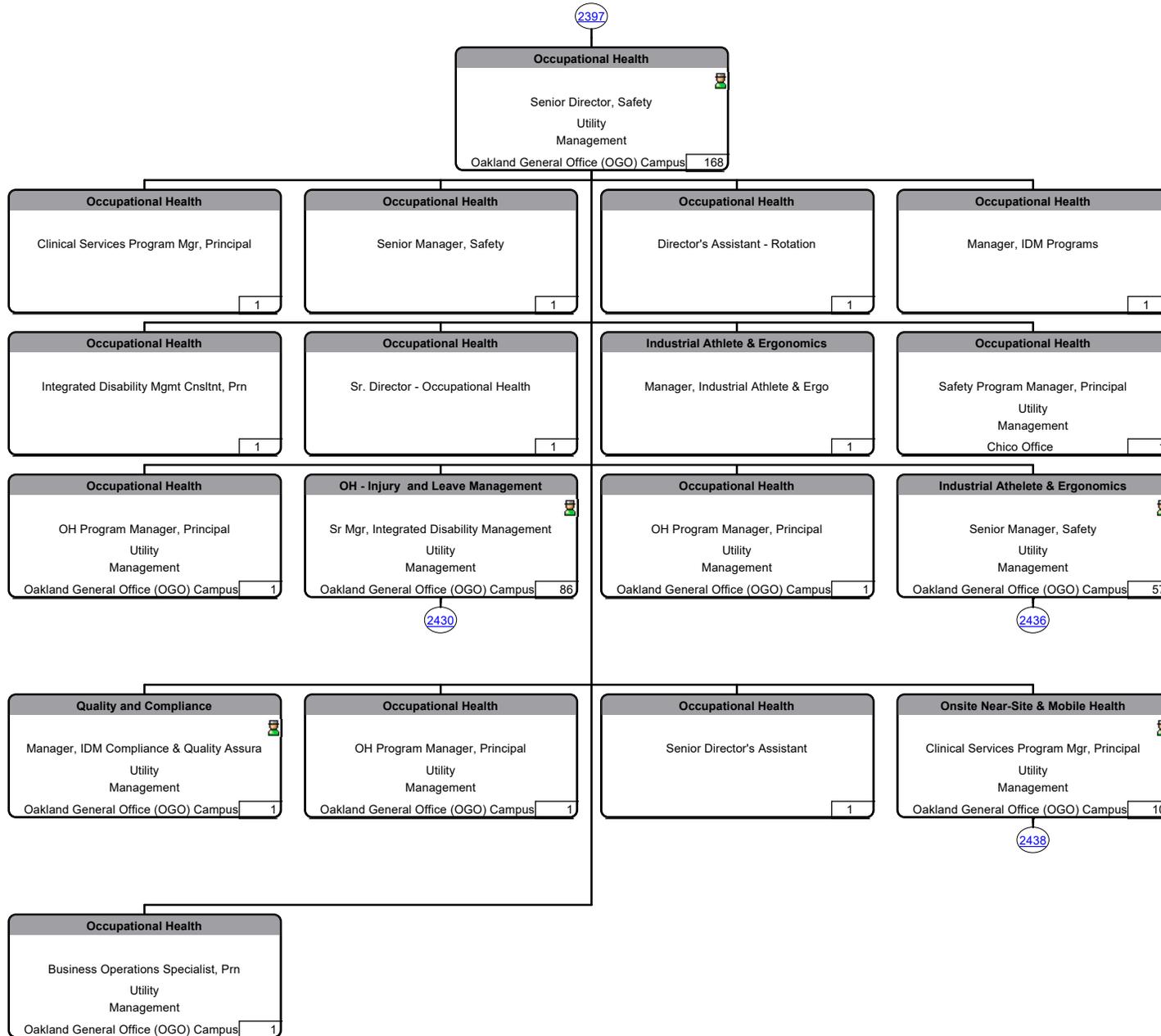
# Apprentice Field Training North



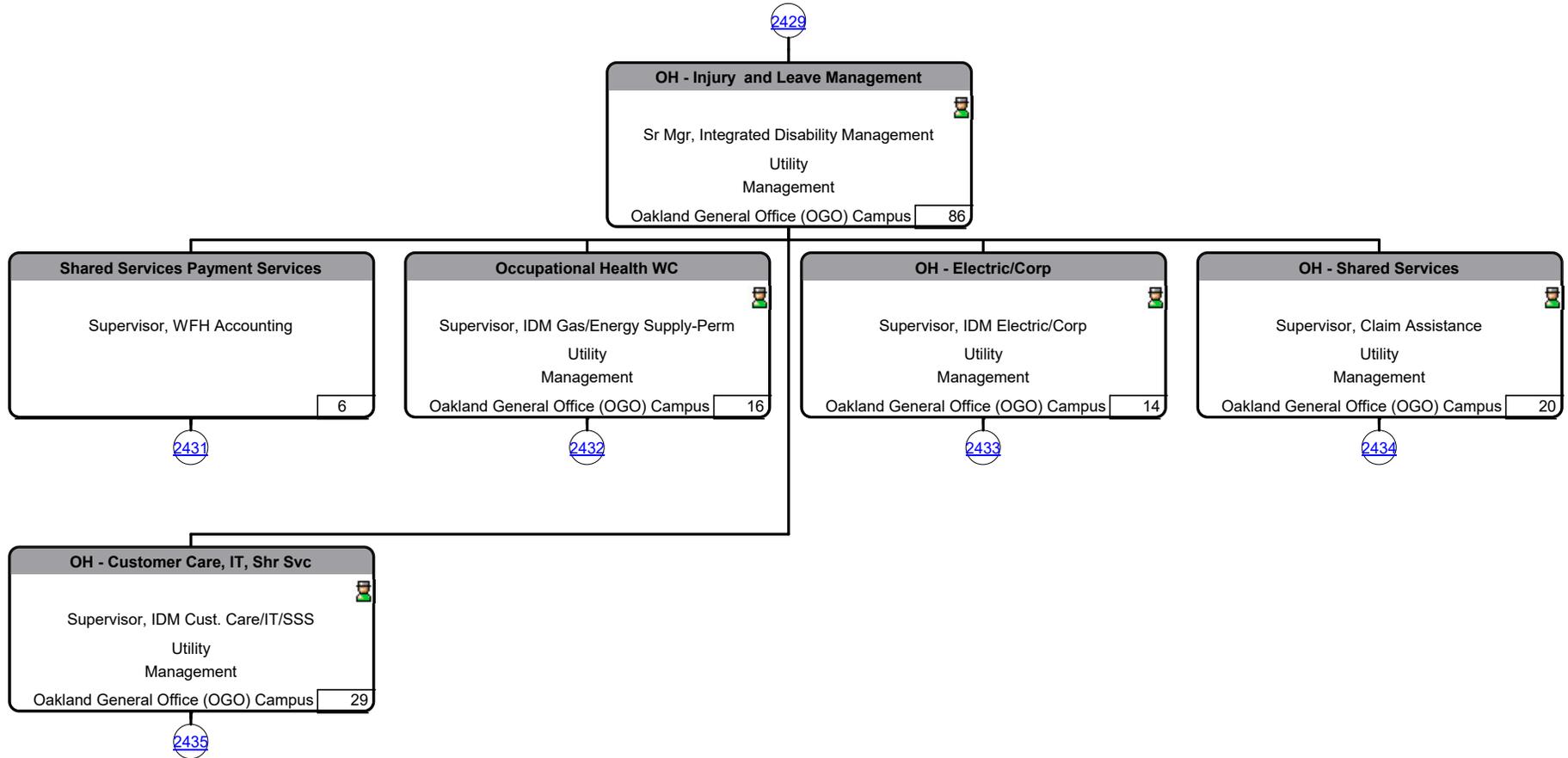
# Apprentice Field Training South



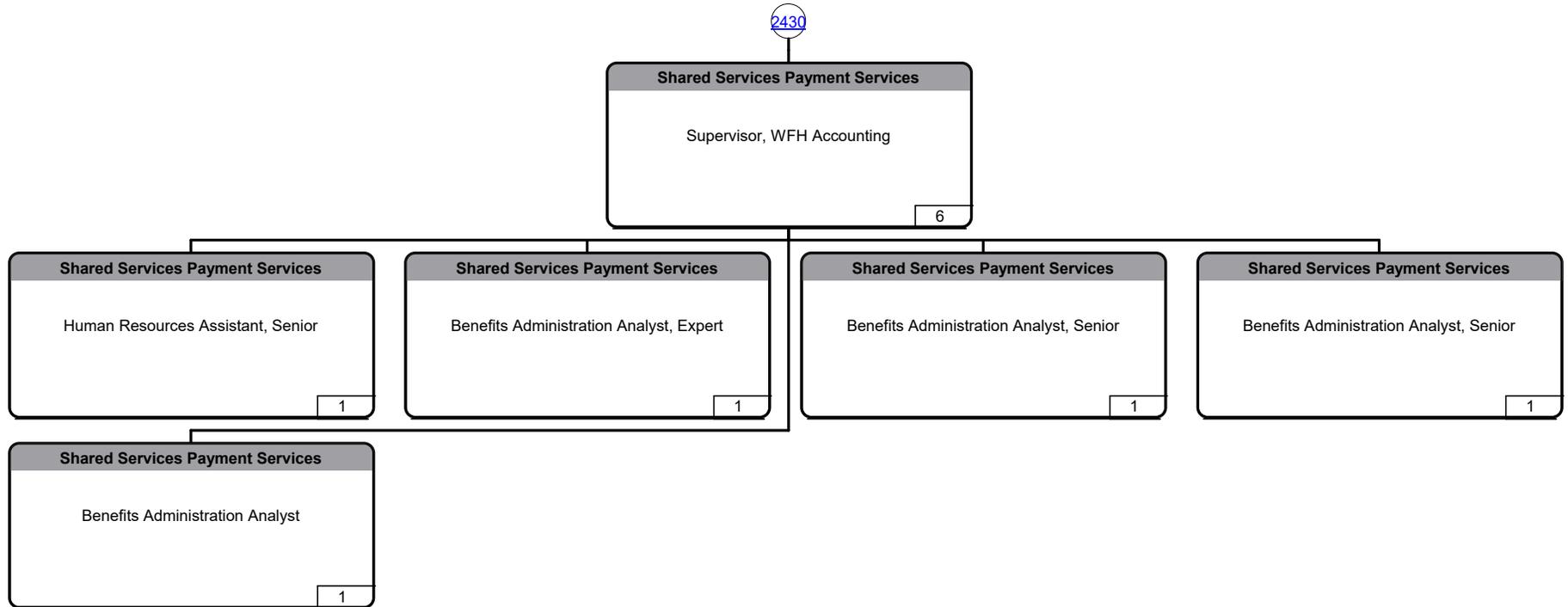
# Occupational Health



# OH - Injury and Leave Management

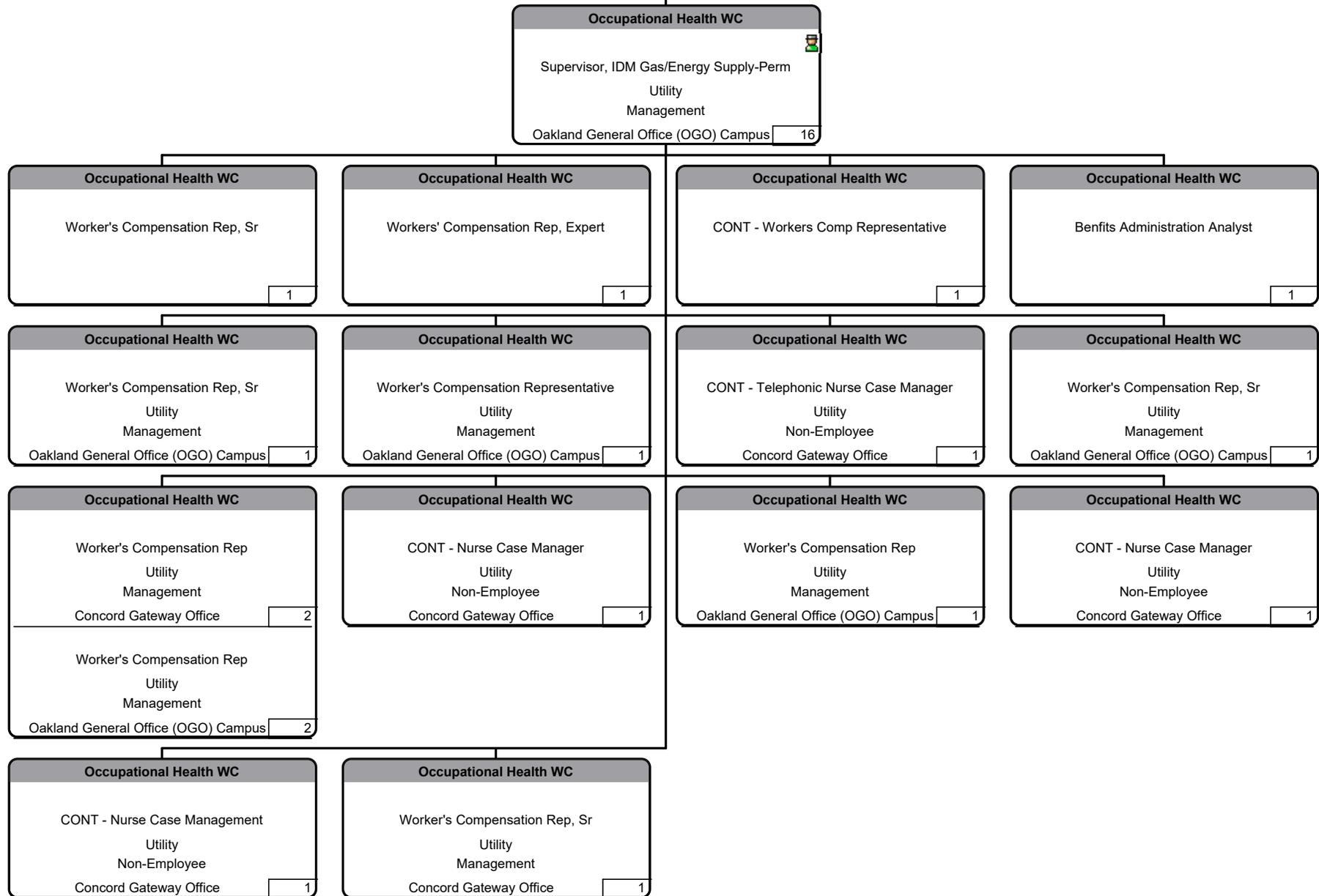


### Shared Services Payment Services



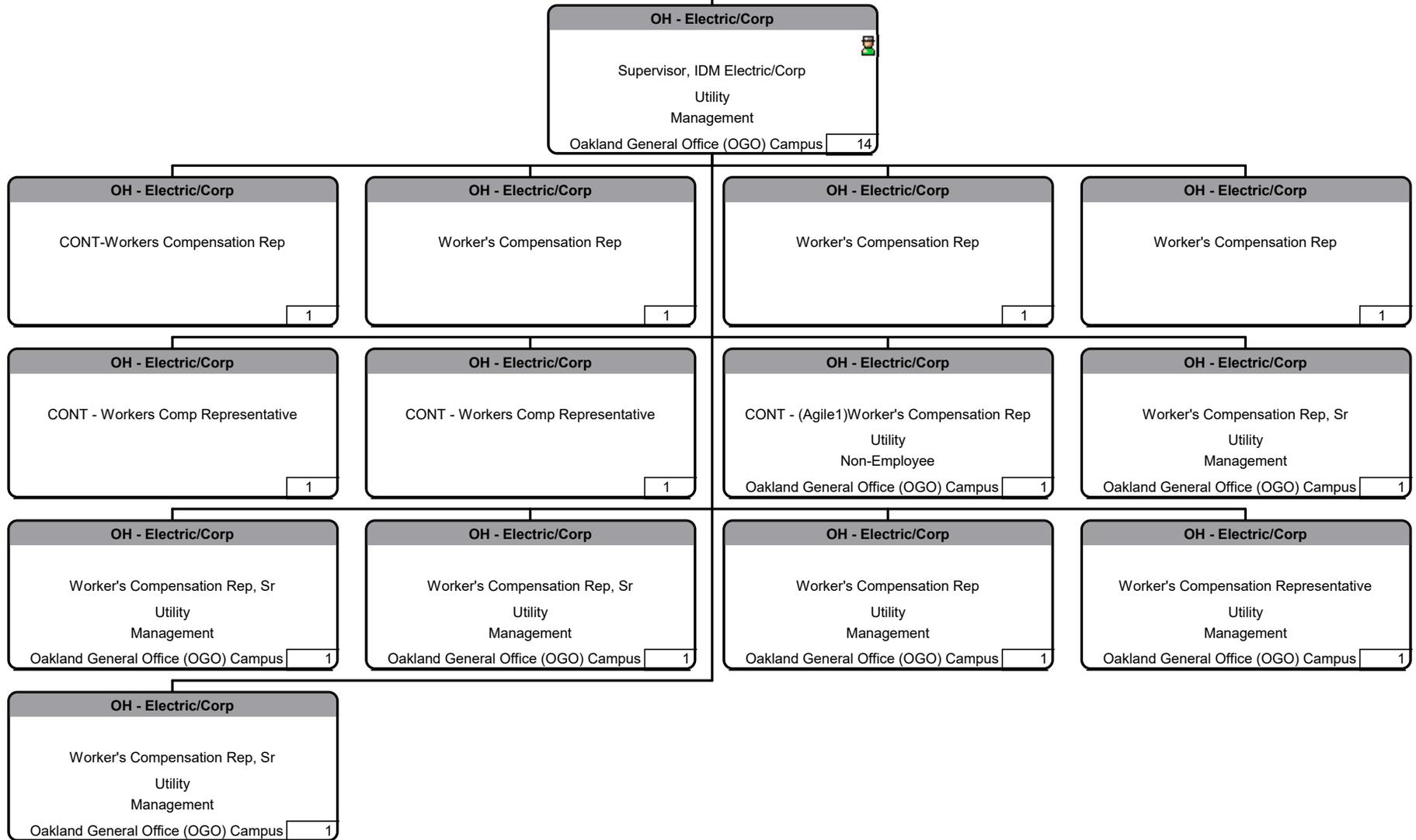
# Occupational Health WC

2430



# OH - Electric/Corp

2430



# OH - Shared Services

2430

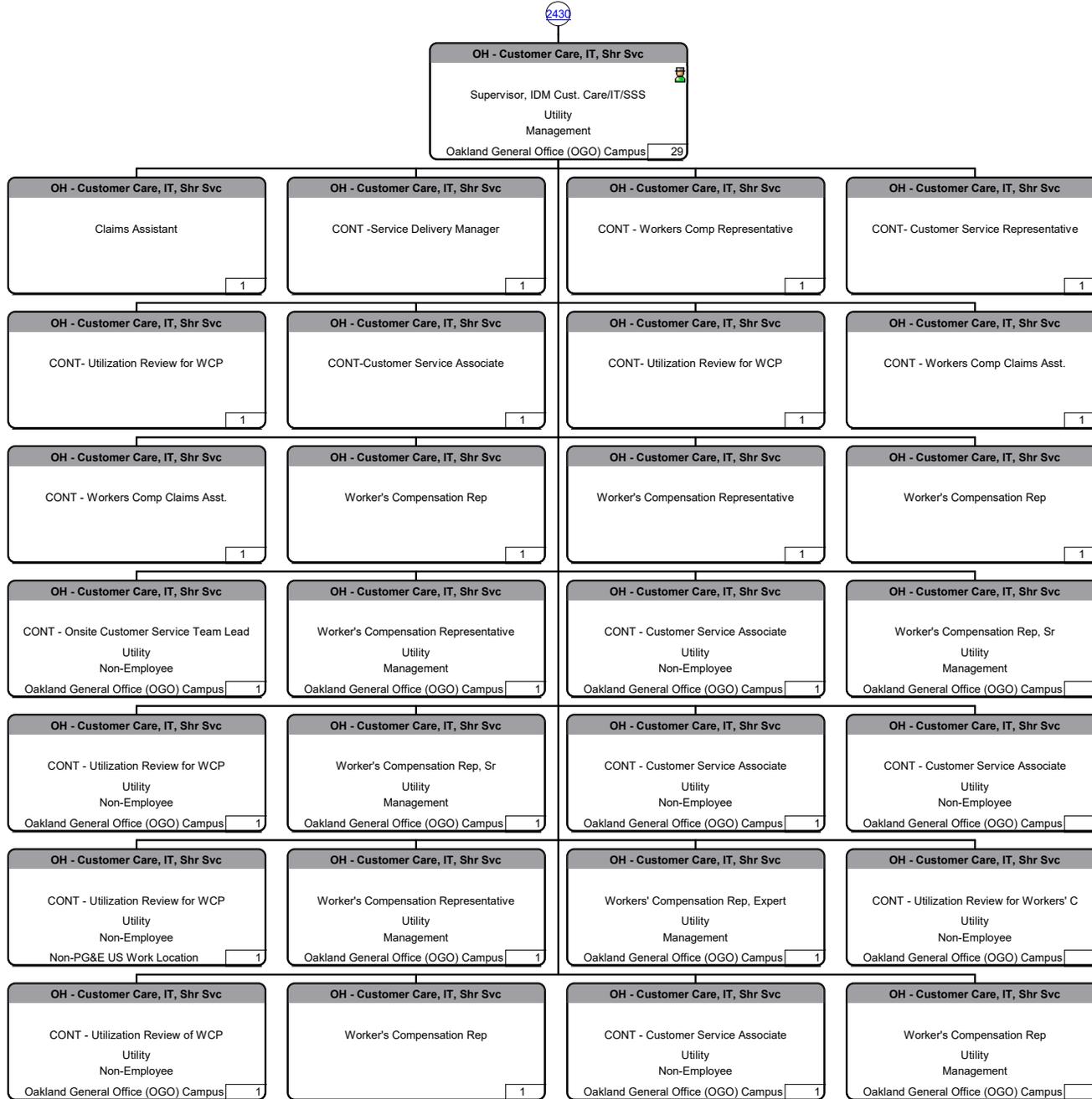
**OH - Shared Services**

Supervisor, Claim Assistance  
Utility  
Management

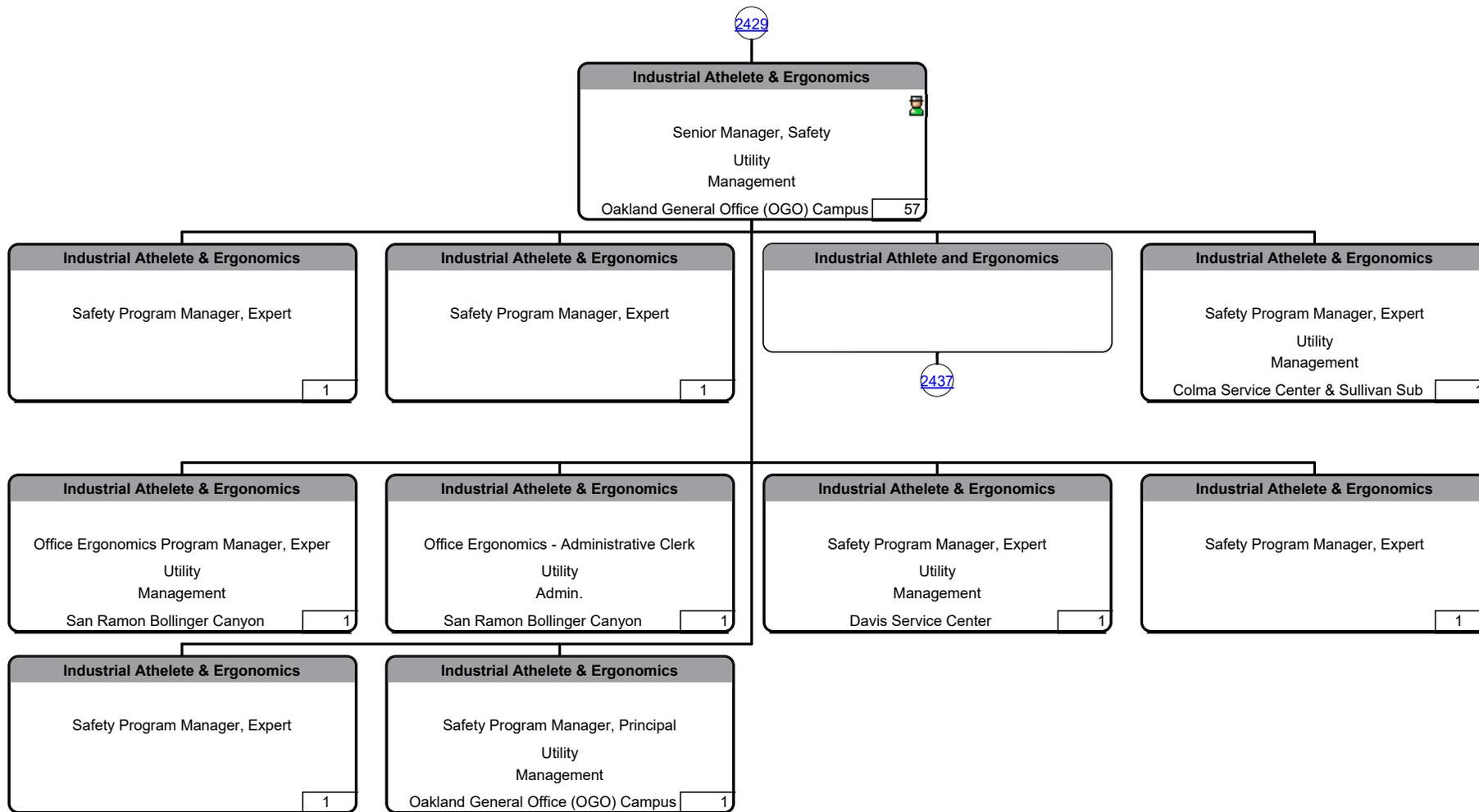
Oakland General Office (OGO) Campus 20



OH - Customer Care, IT, Shr Svc  
 OH - Customer Care, IT, Shr Svc

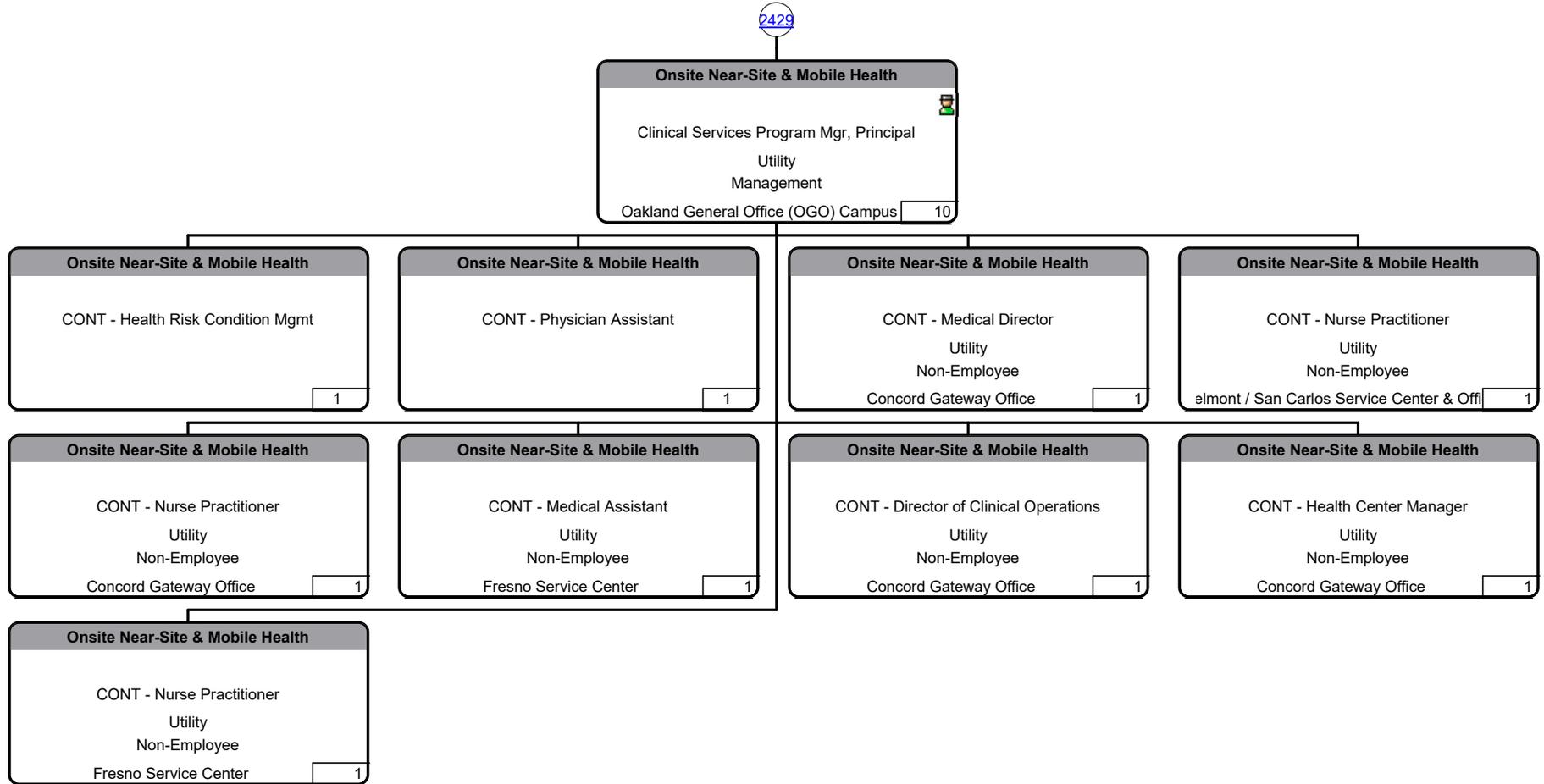


### Industrial Athlete & Ergonomics

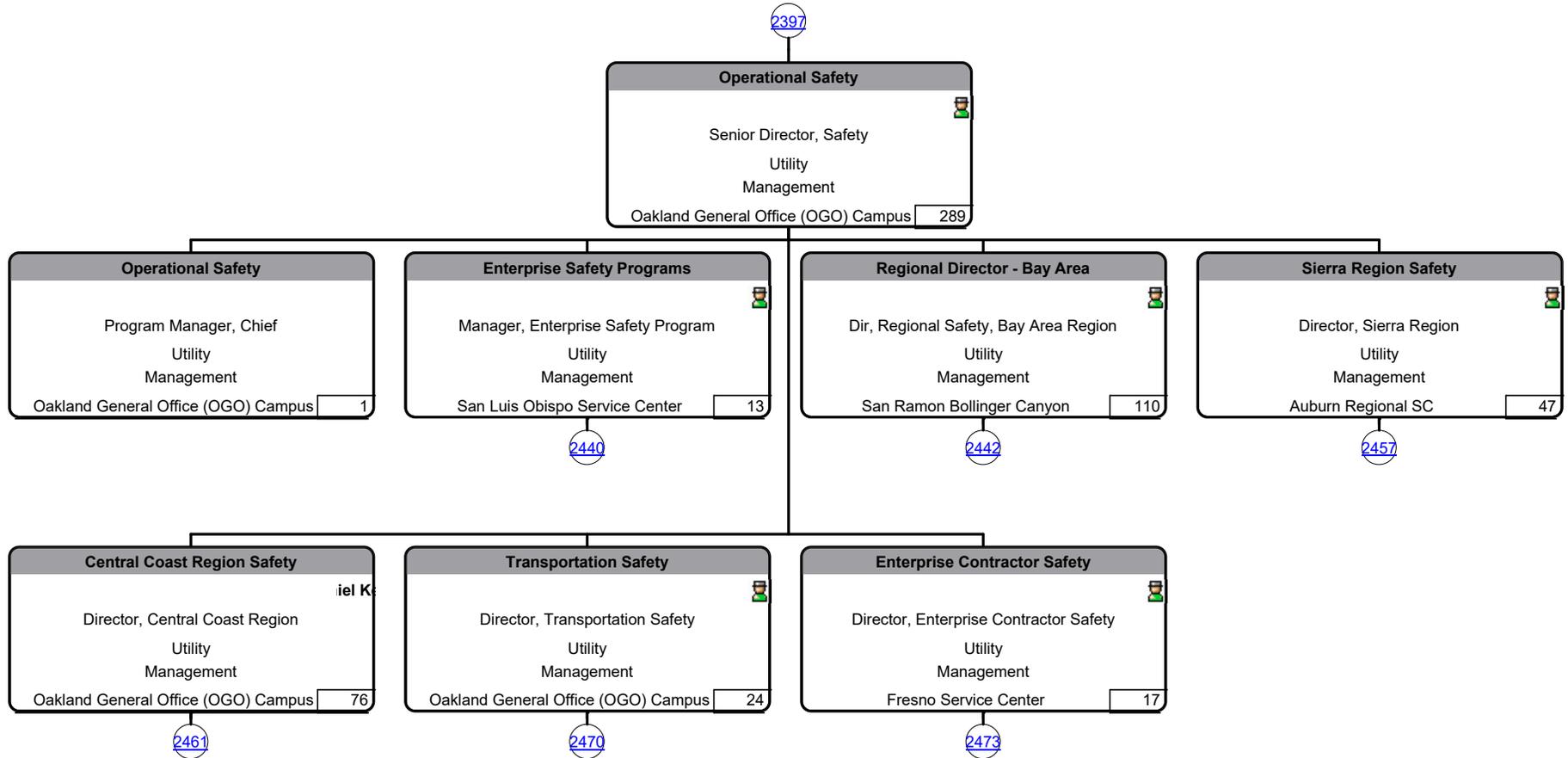




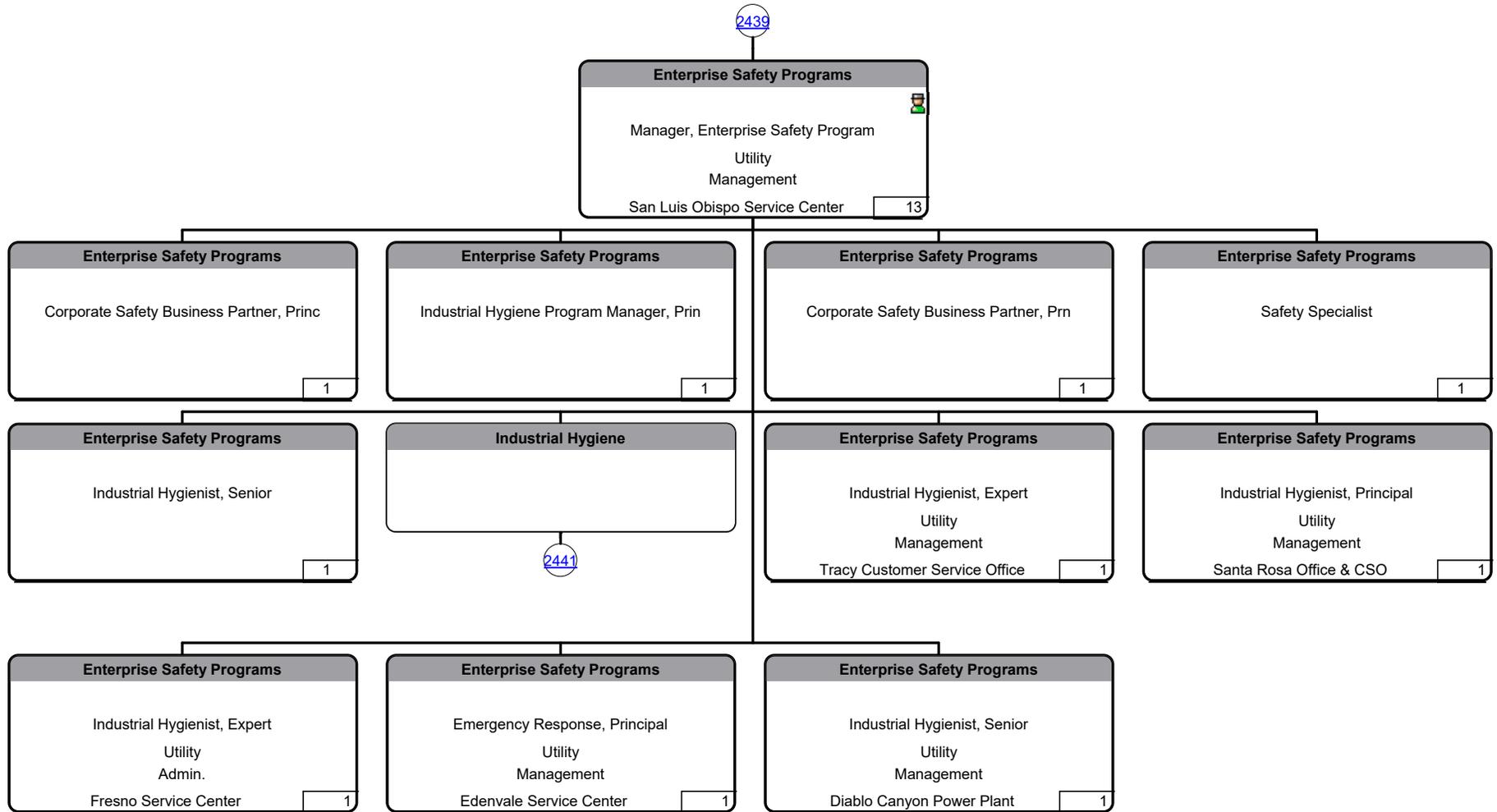
### Onsite Near-Site & Mobile Health



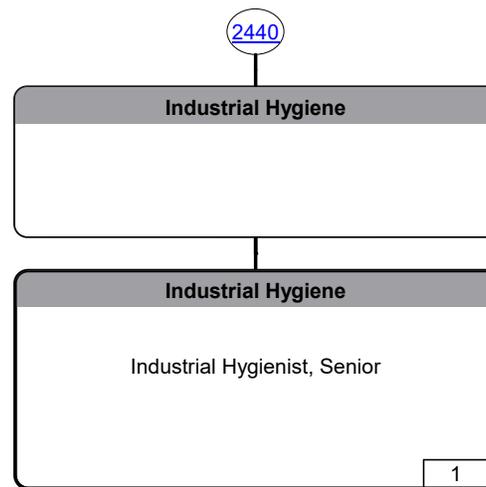
# Operational Safety



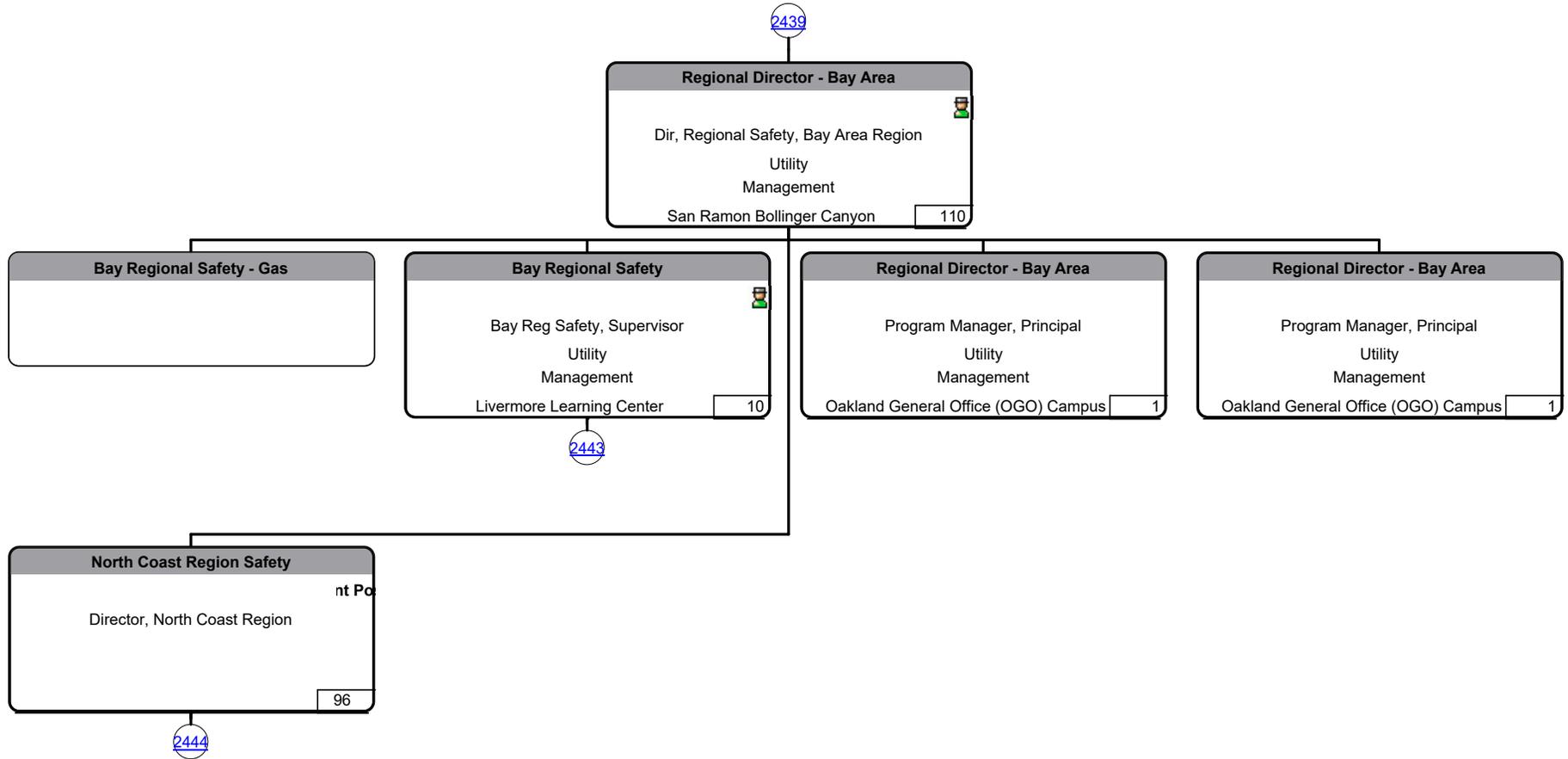
# Enterprise Safety Programs



## Industrial Hygiene

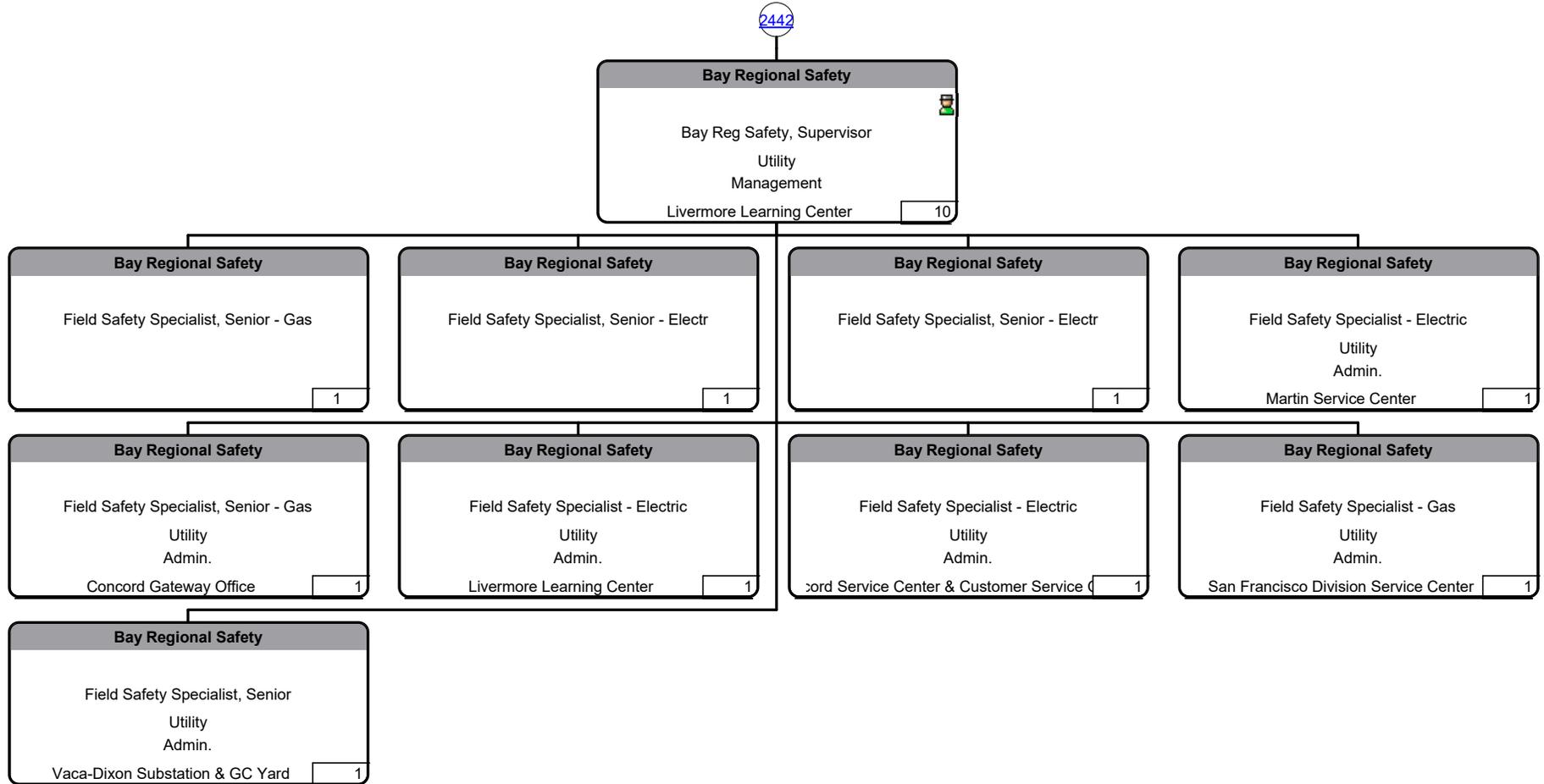


### Regional Director - Bay Area

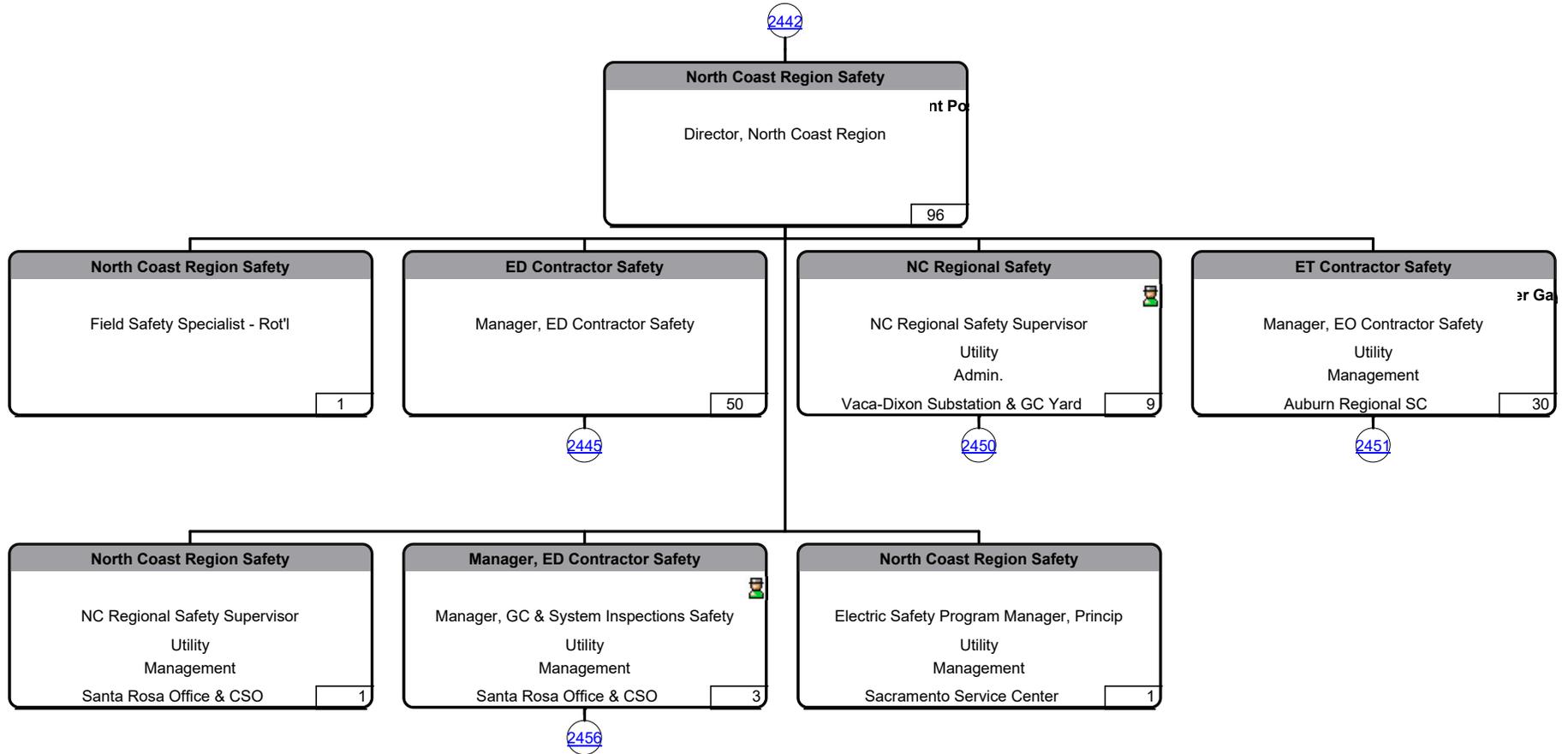


### Bay Regional Safety

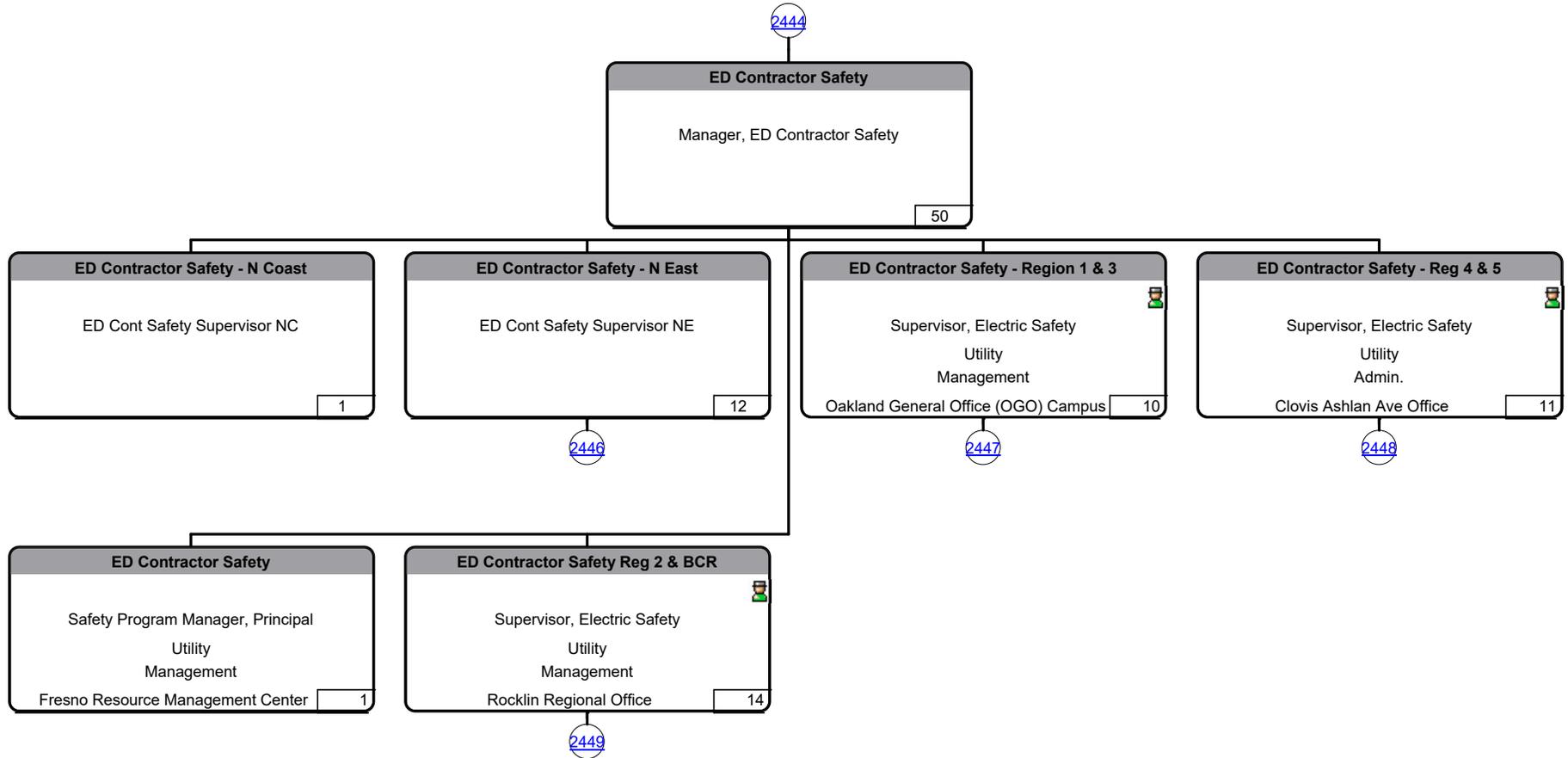
2442



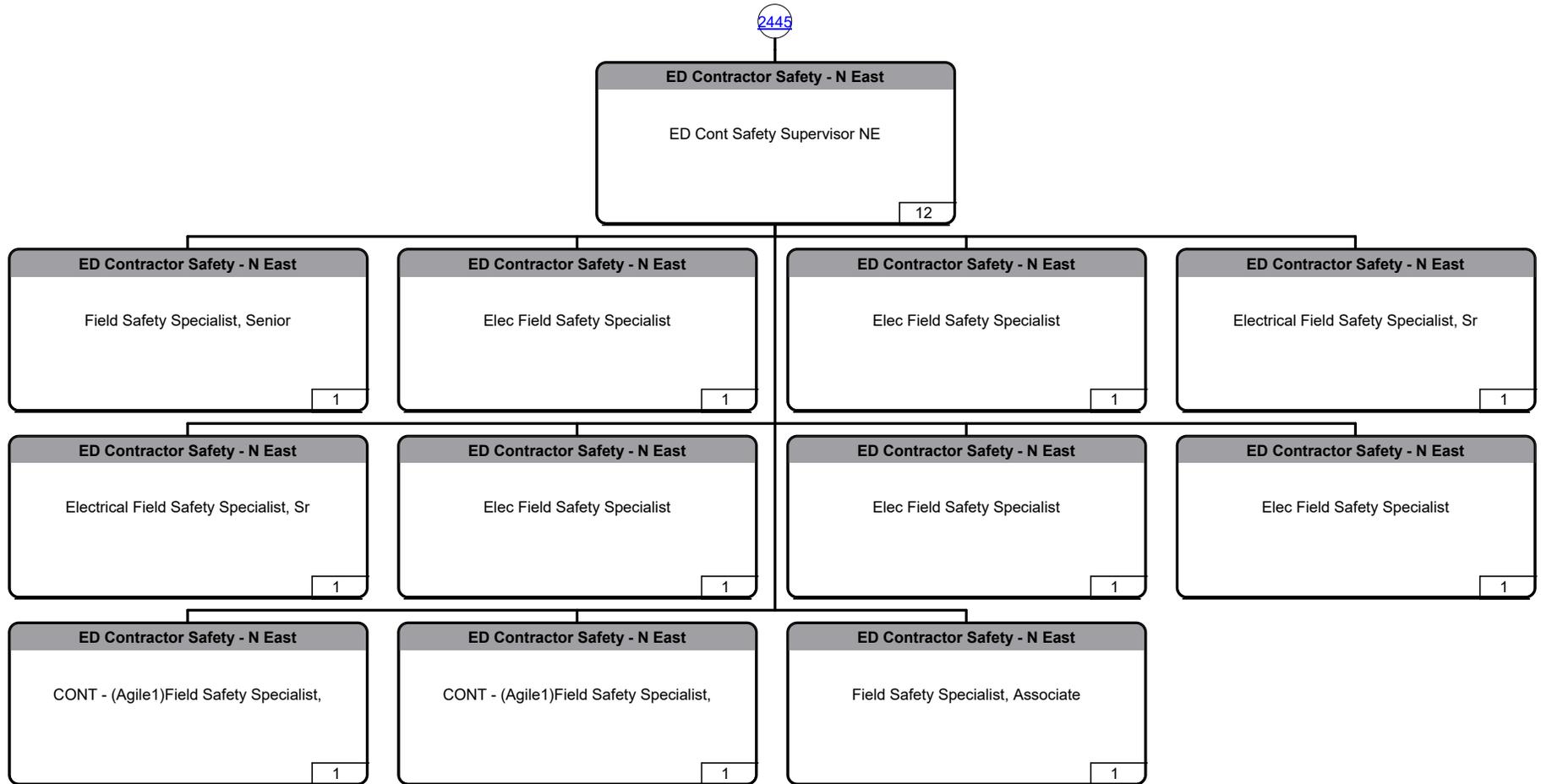
# North Coast Region Safety



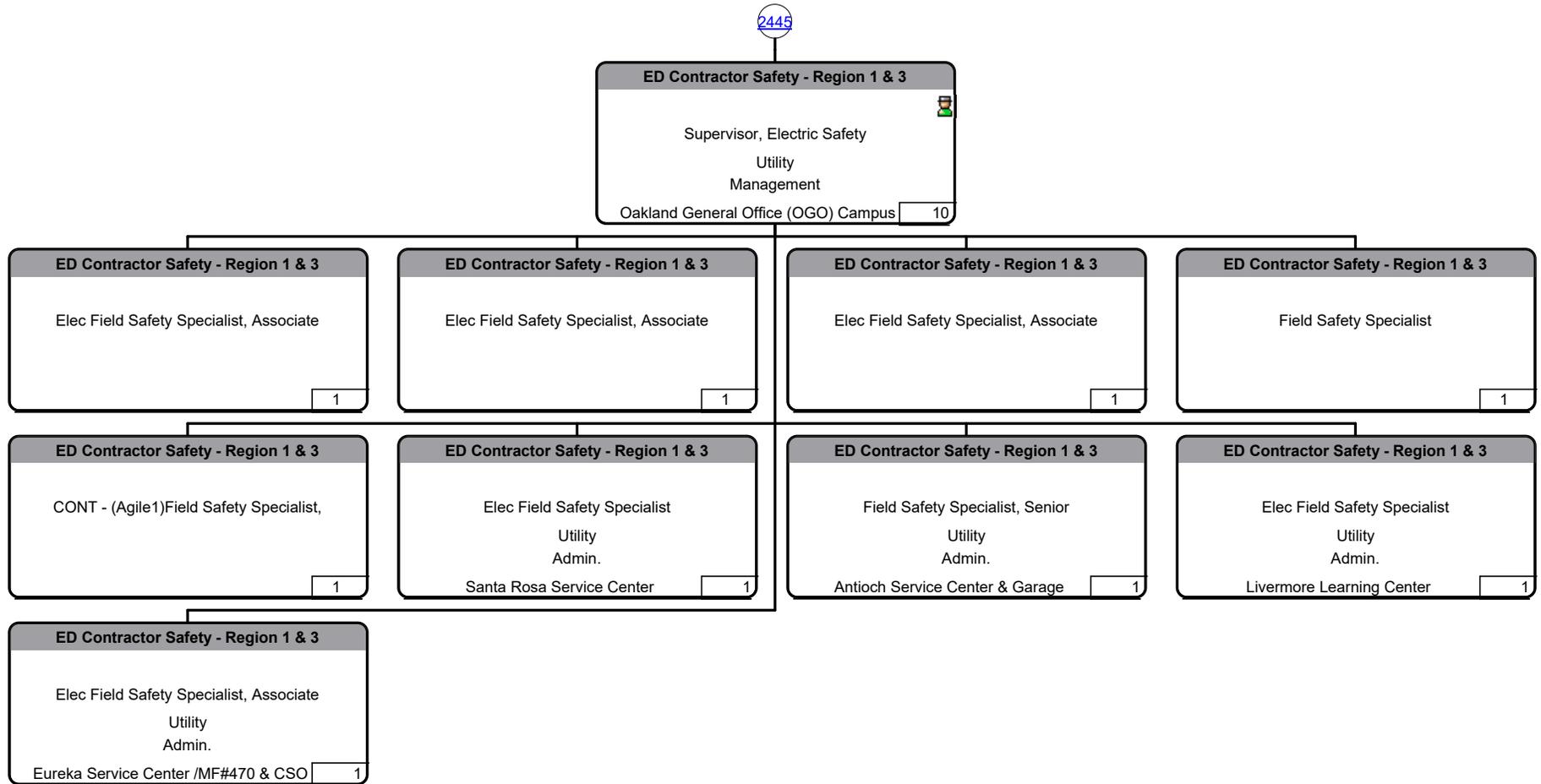
# ED Contractor Safety



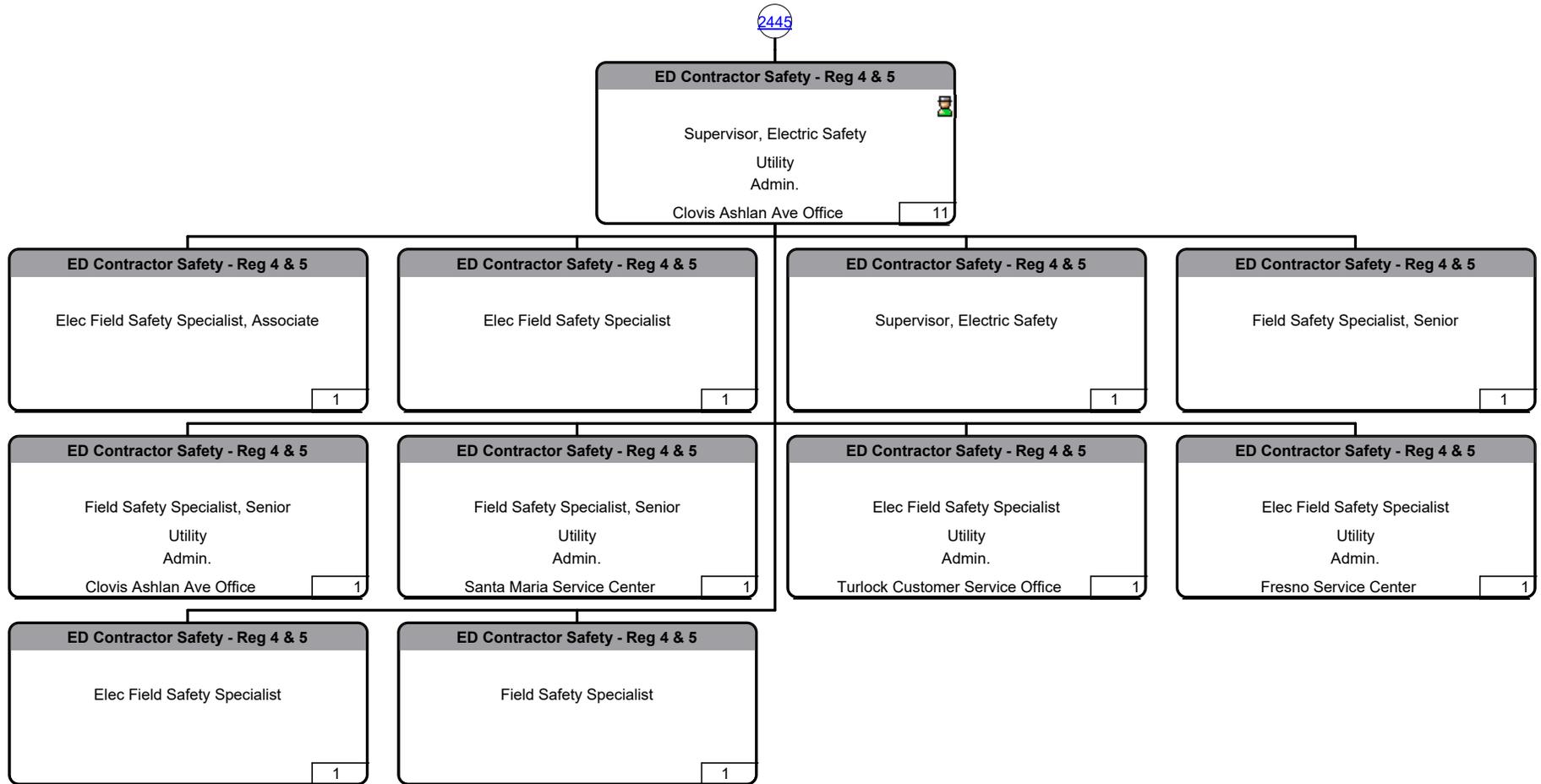
### ED Contractor Safety - N East



## ED Contractor Safety - Region 1 & 3

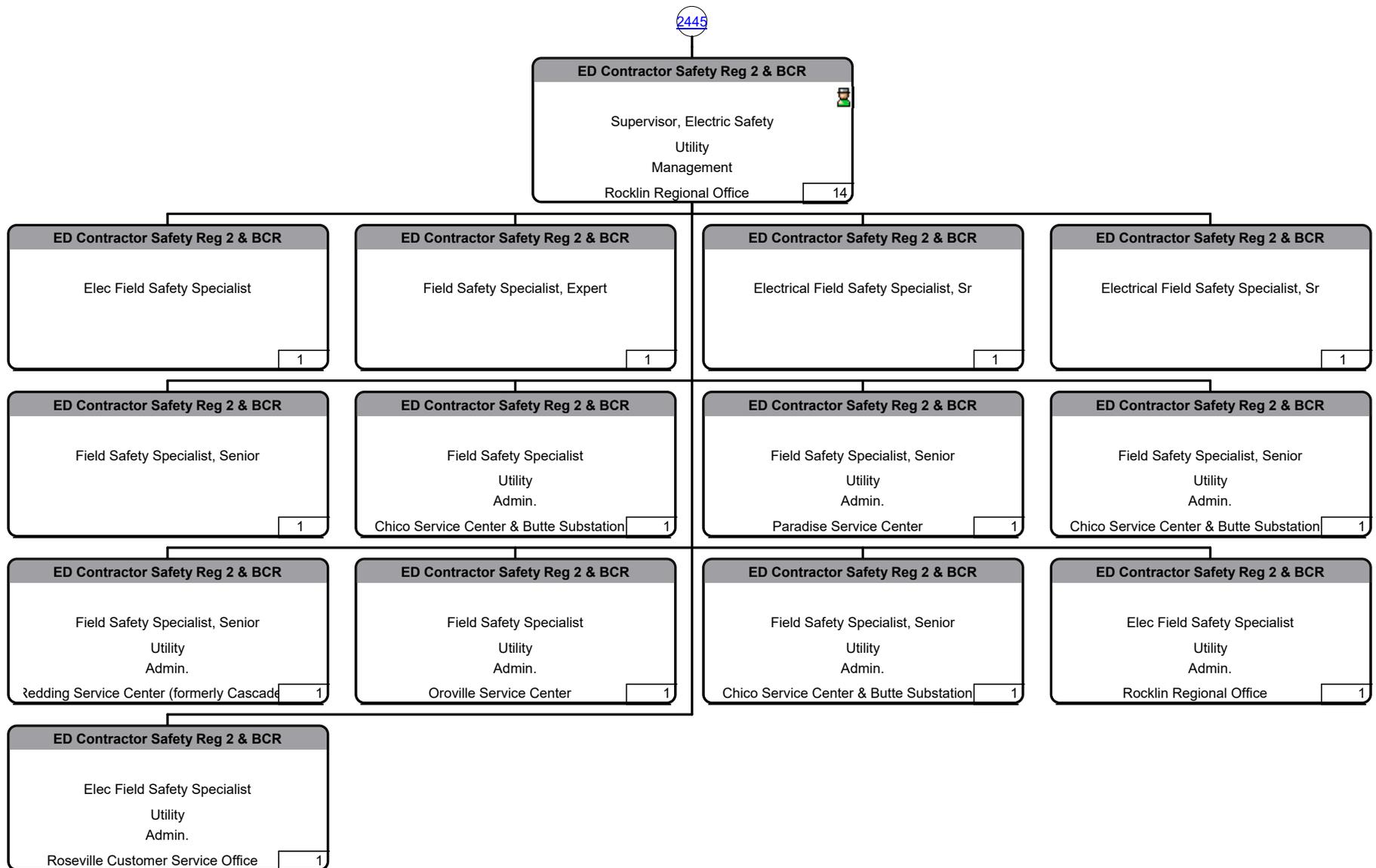


### ED Contractor Safety - Reg 4 & 5



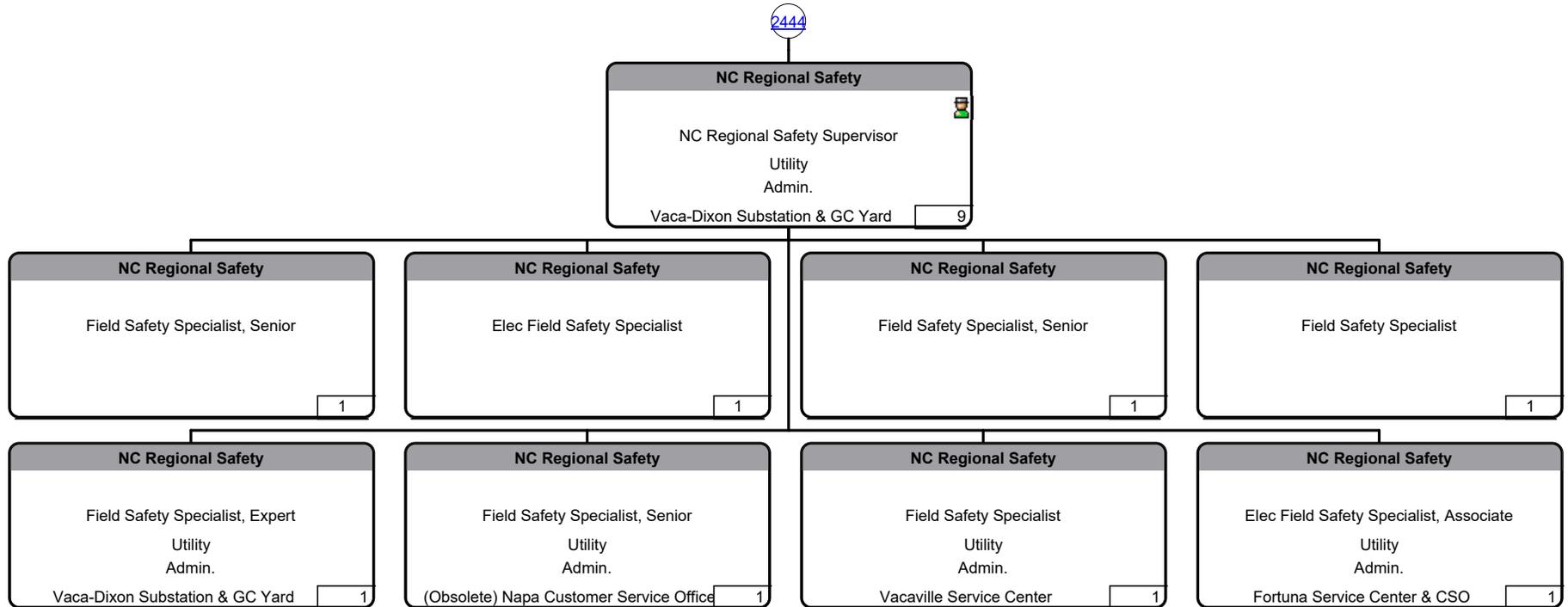
# ED Contractor Safety Reg 2 & BCR

2449

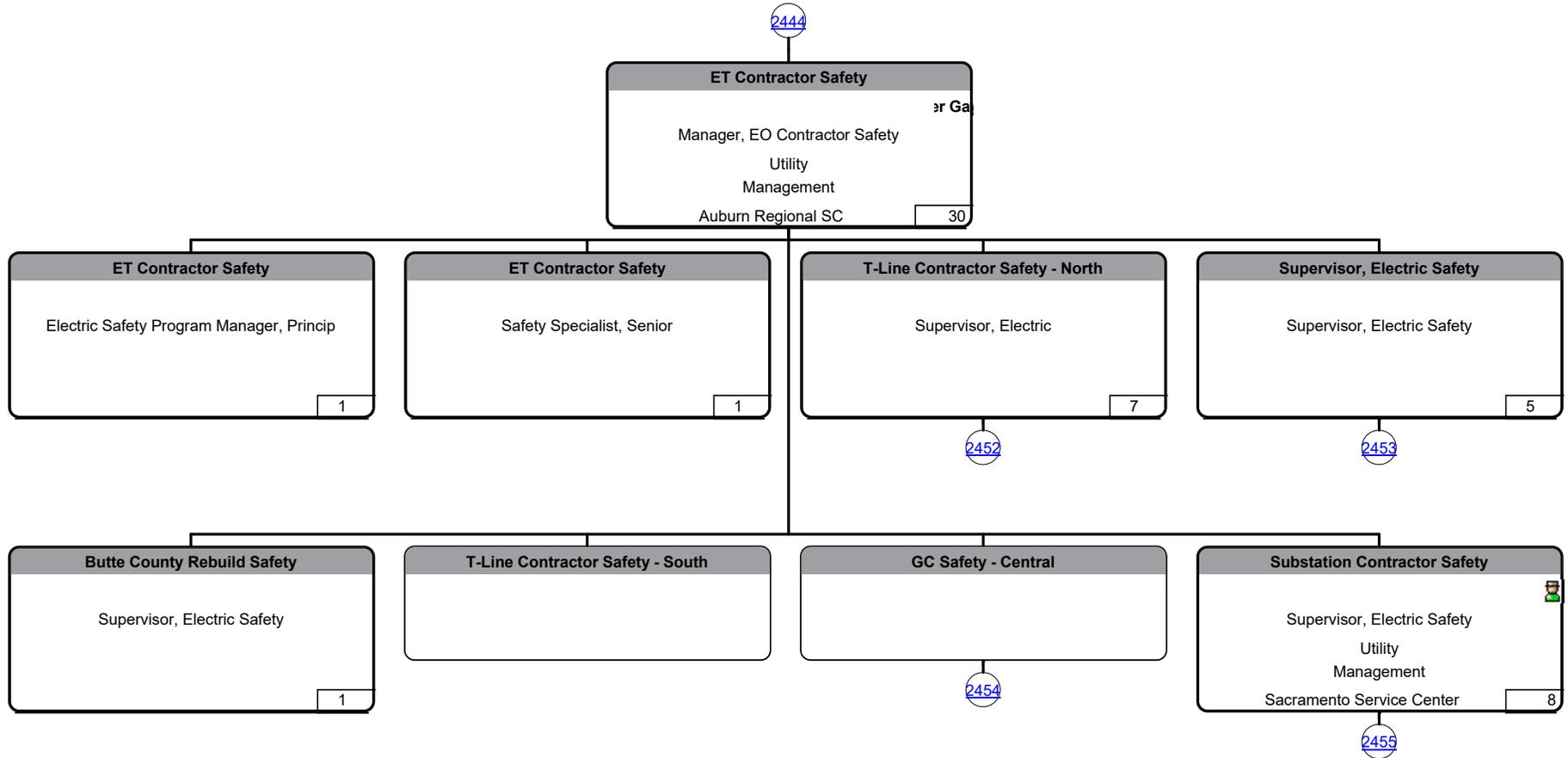


# NC Regional Safety

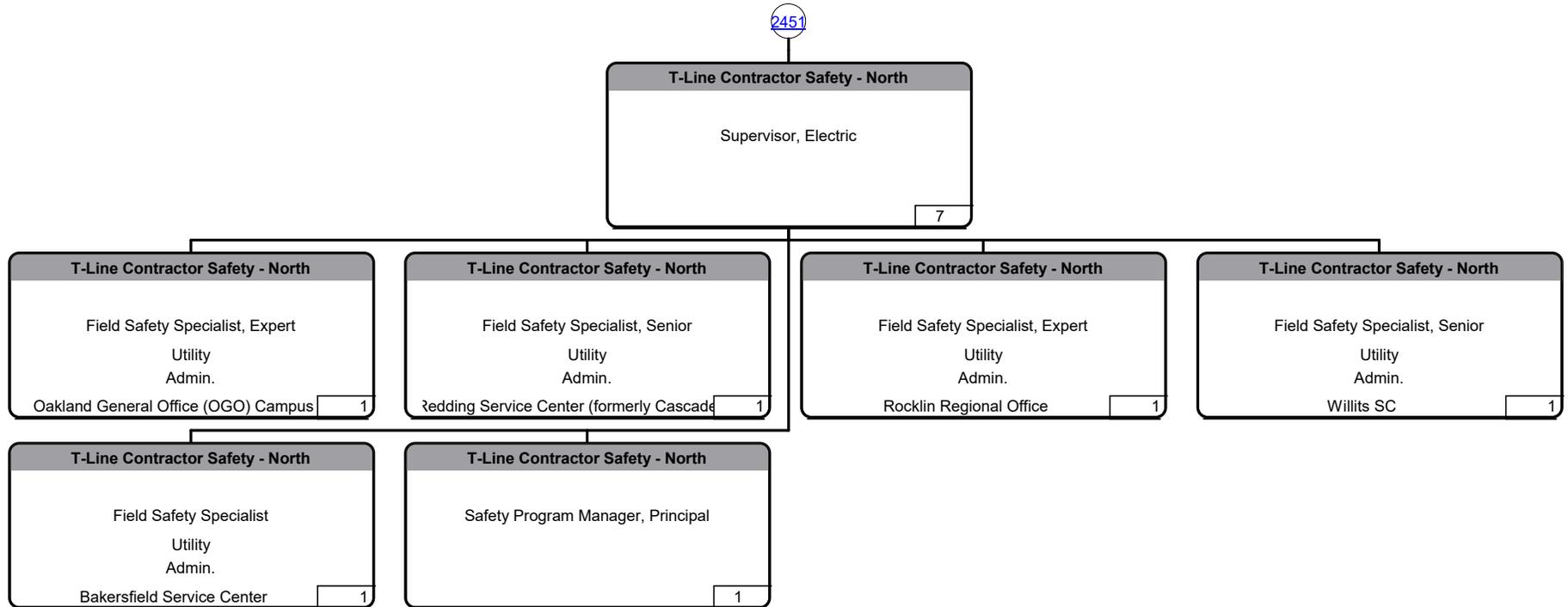
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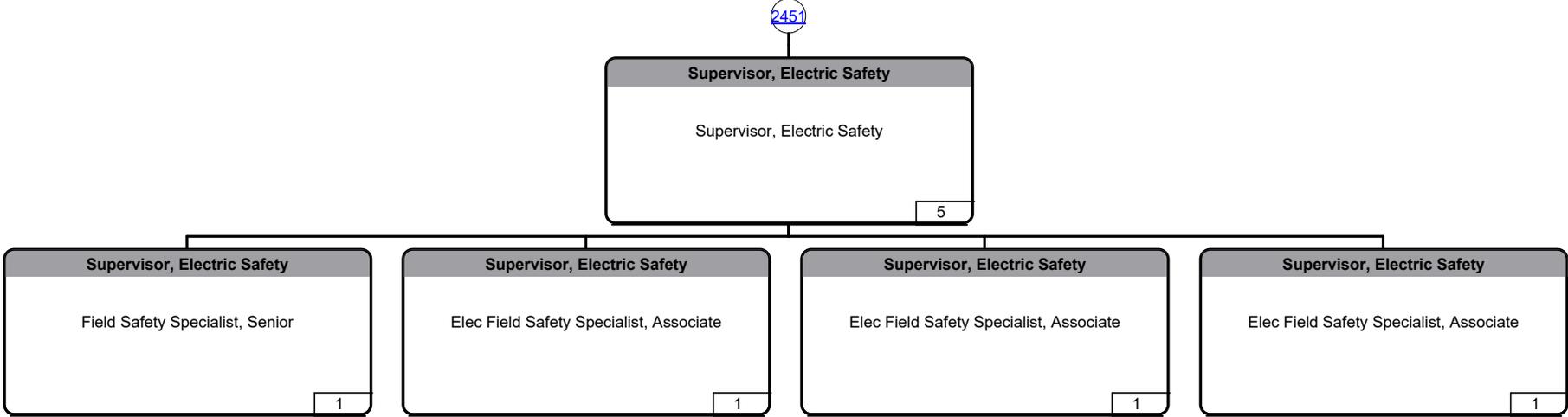
# ET Contractor Safety



### T-Line Contractor Safety - North

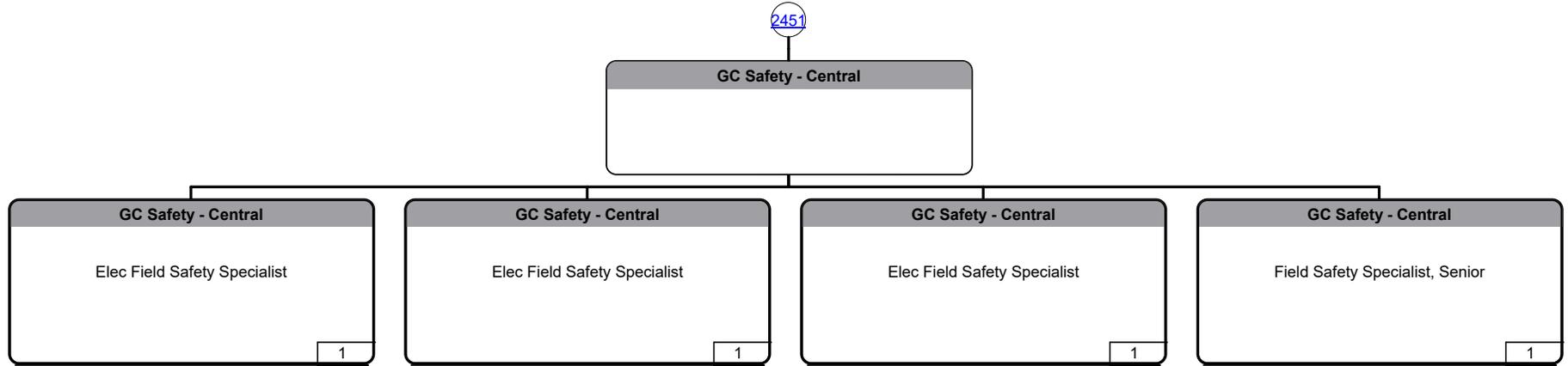


### Supervisor, Electric Safety

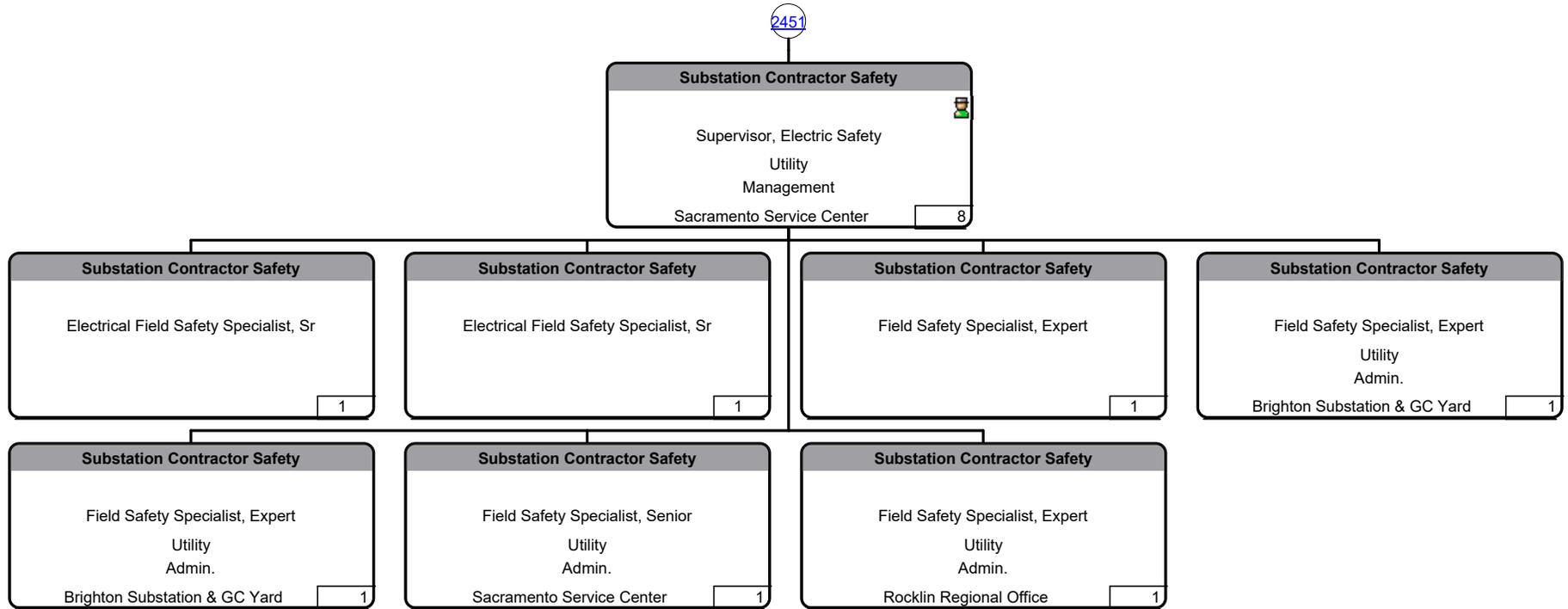


### GC Safety - Central

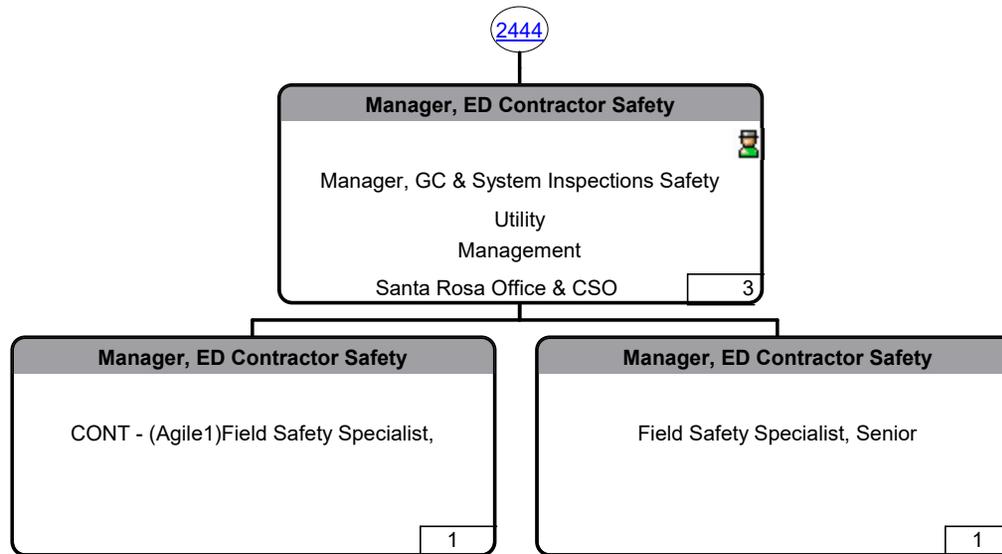
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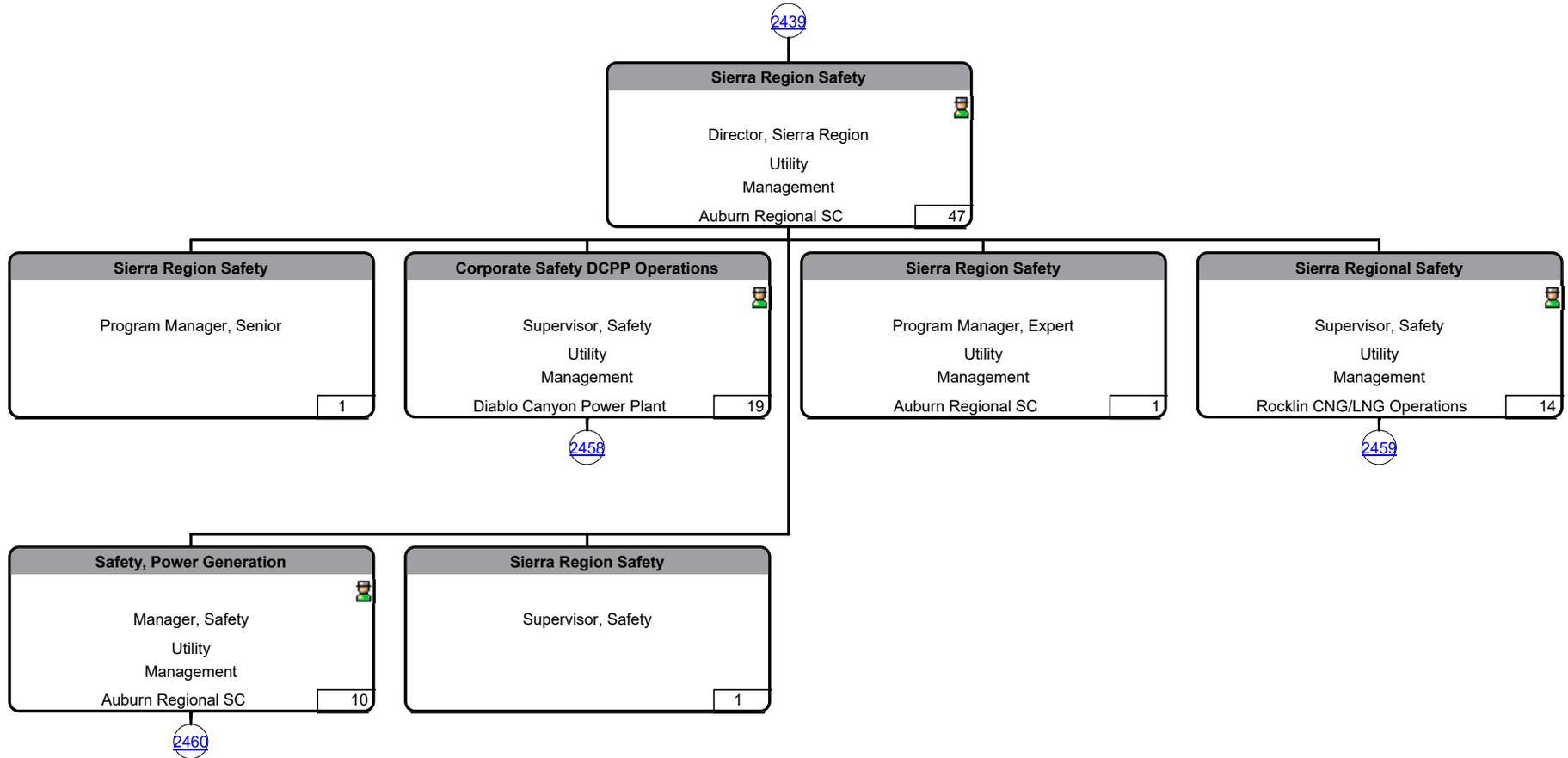
### Substation Contractor Safety



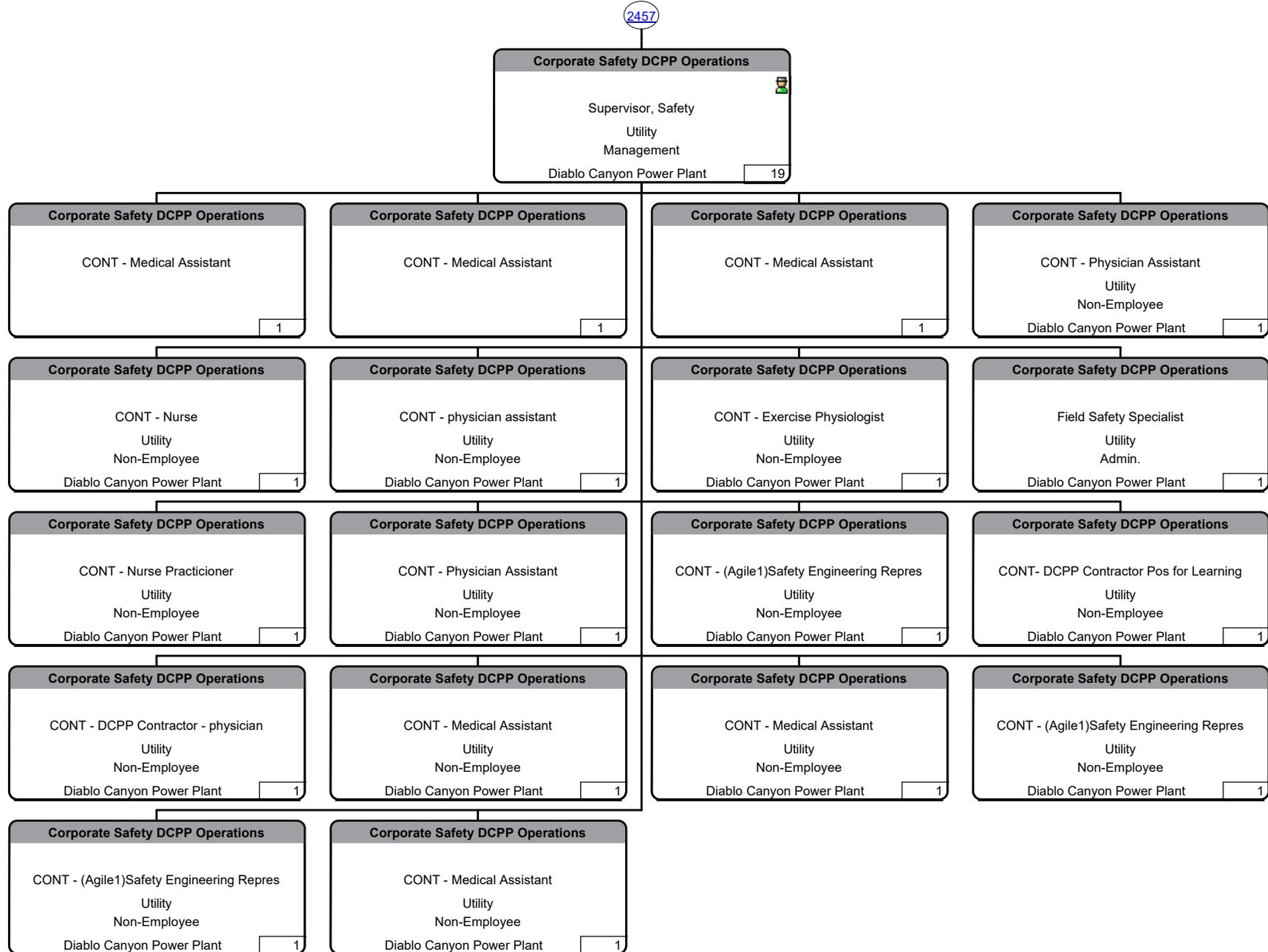
## Manager, ED Contractor Safety



# Sierra Region Safety

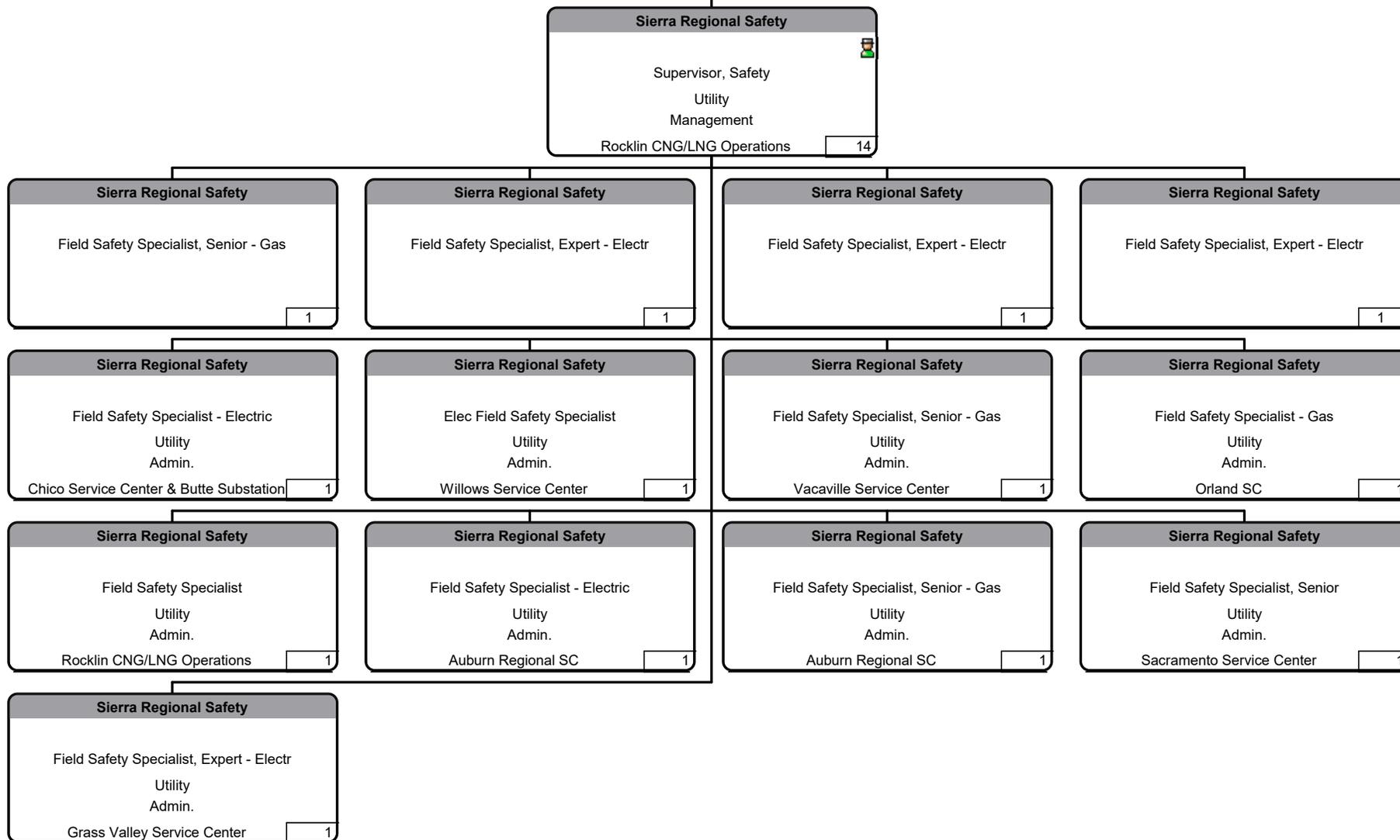


# Corporate Safety DCPD Operations

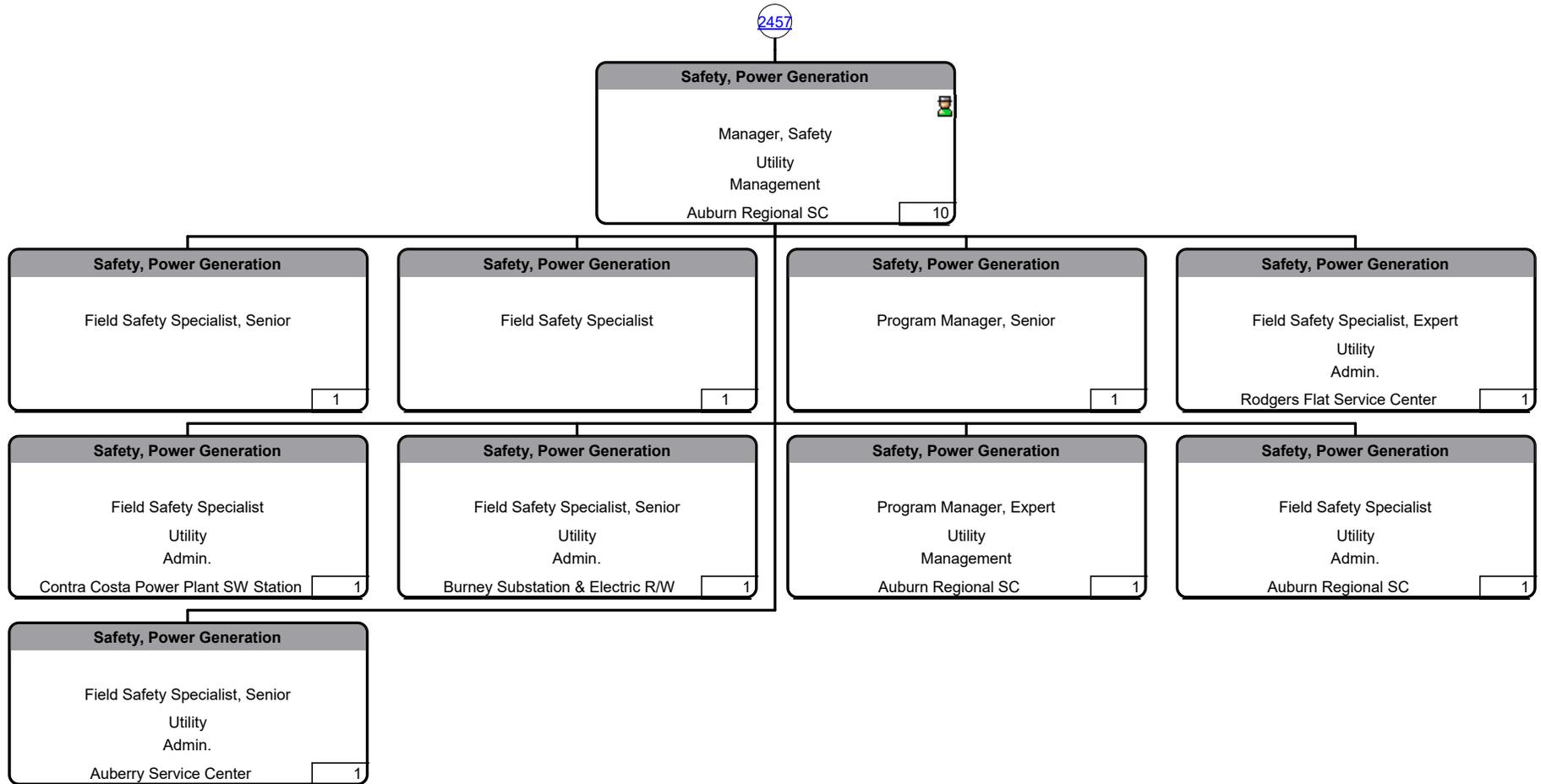


# Sierra Regional Safety

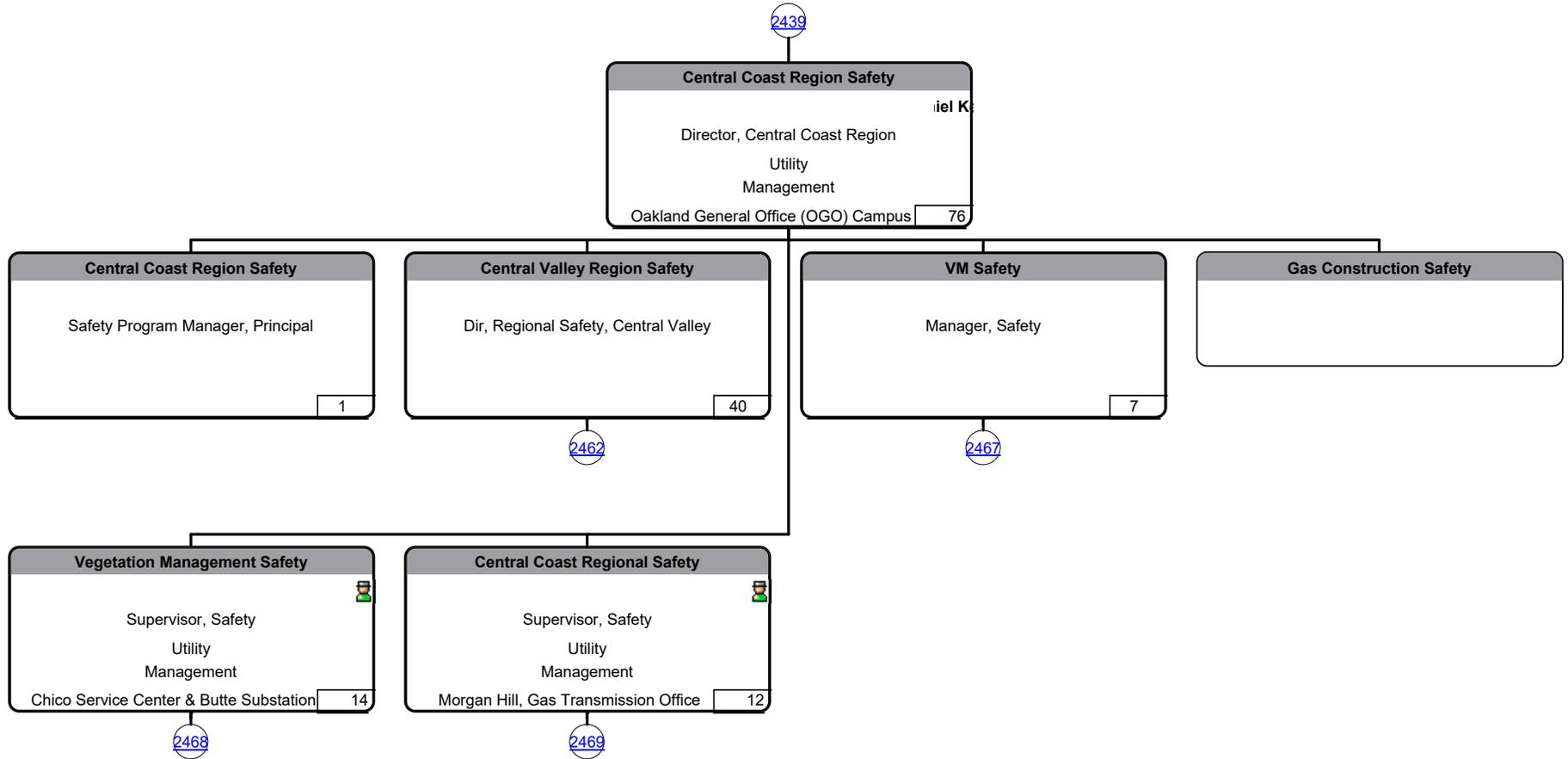
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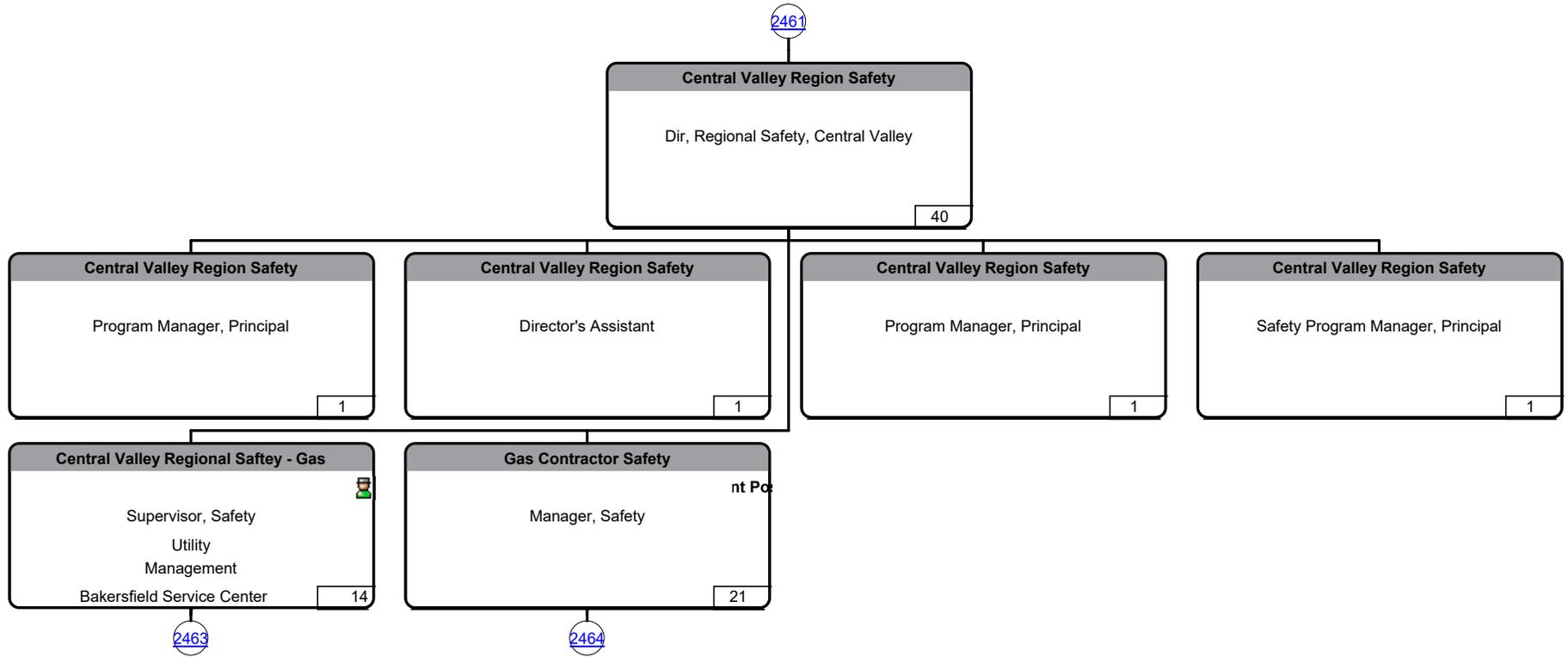
### Safety, Power Generation



### Central Coast Region Safety

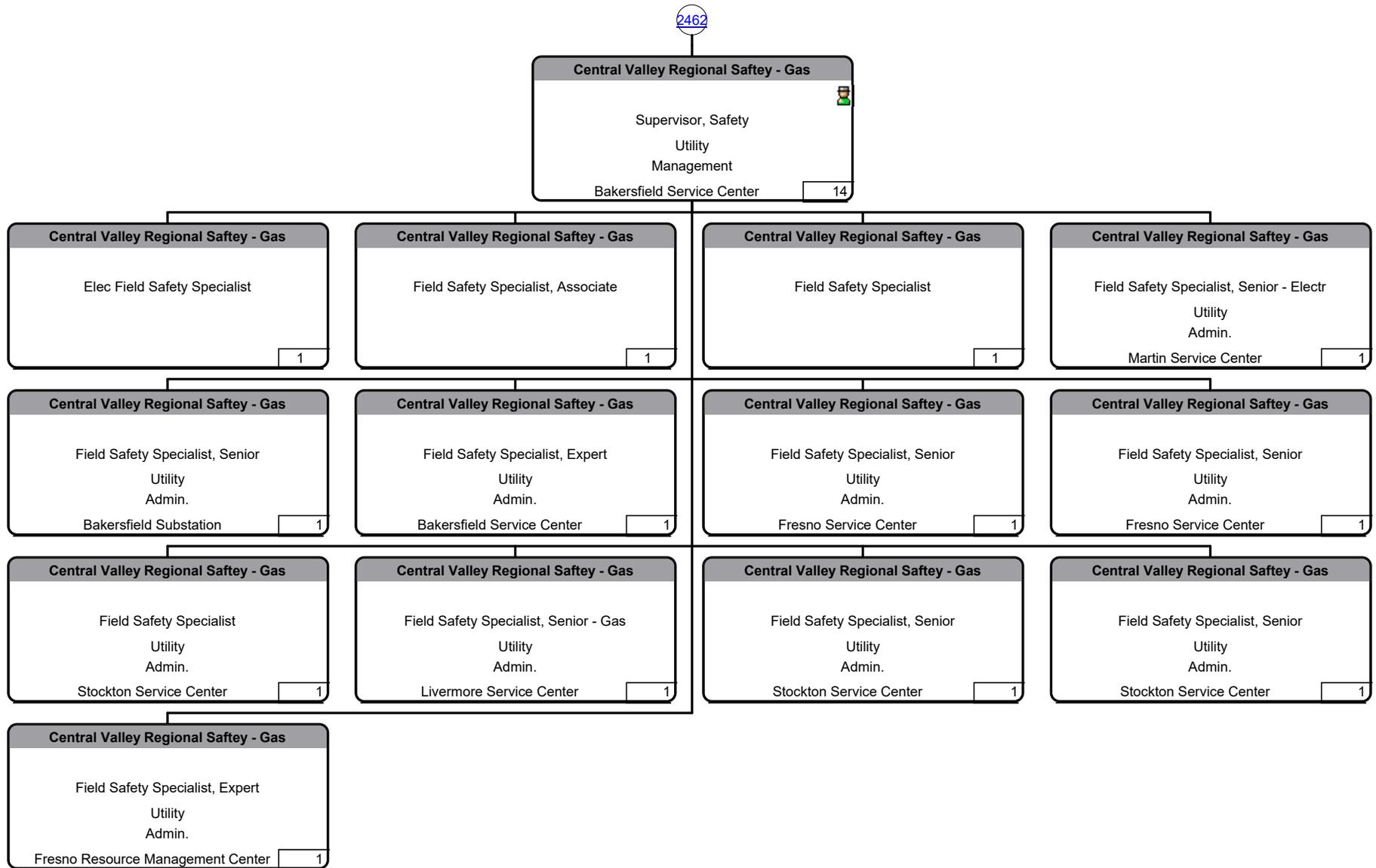


# Central Valley Region Safety

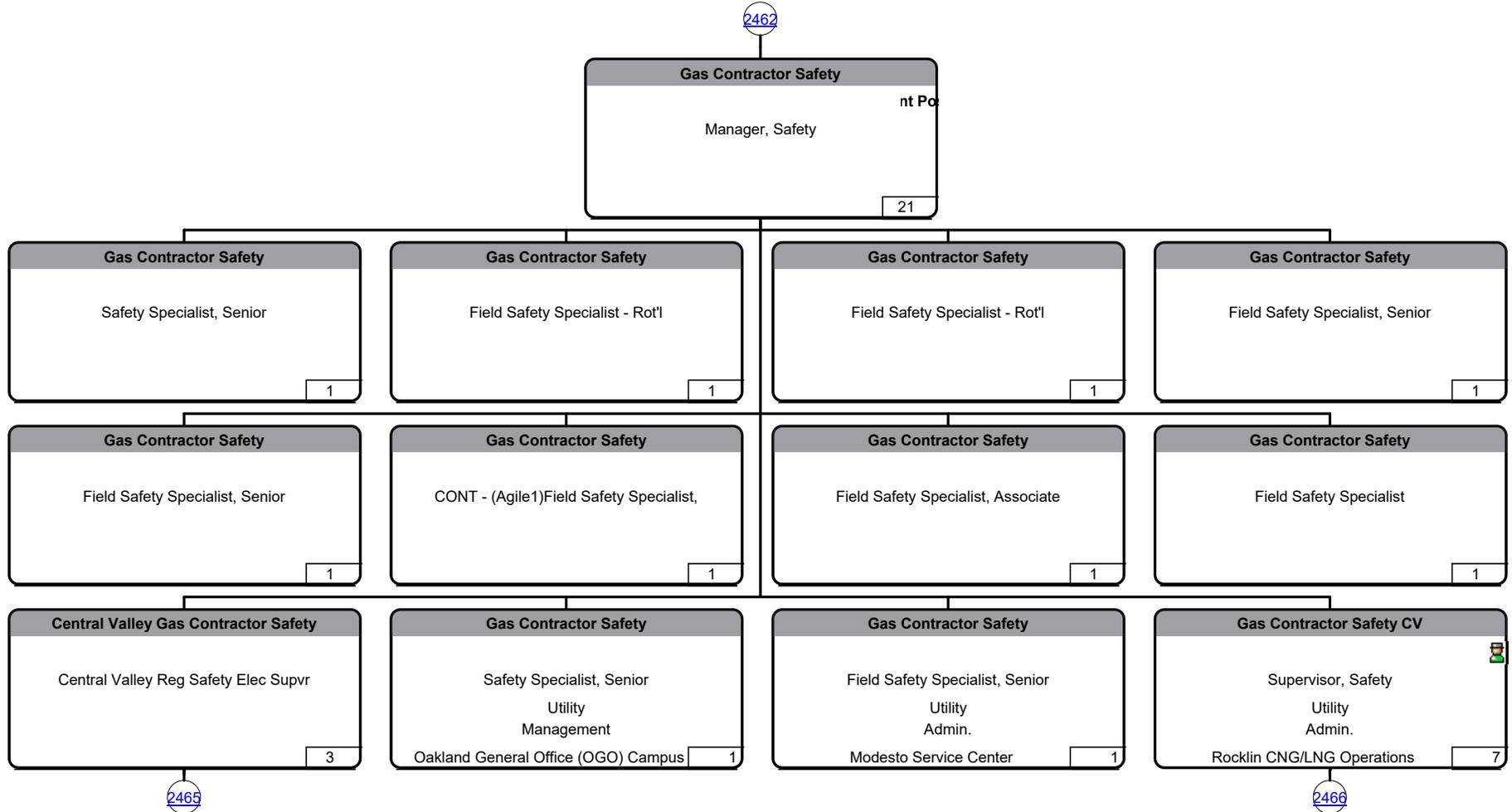


# Central Valley Regional Saftey - Gas

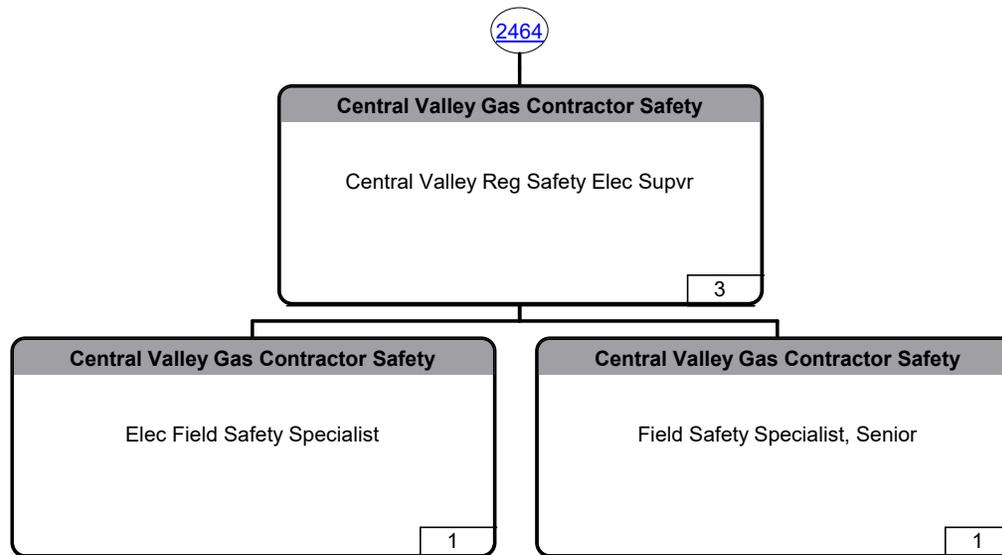
2462



# Gas Contractor Safety

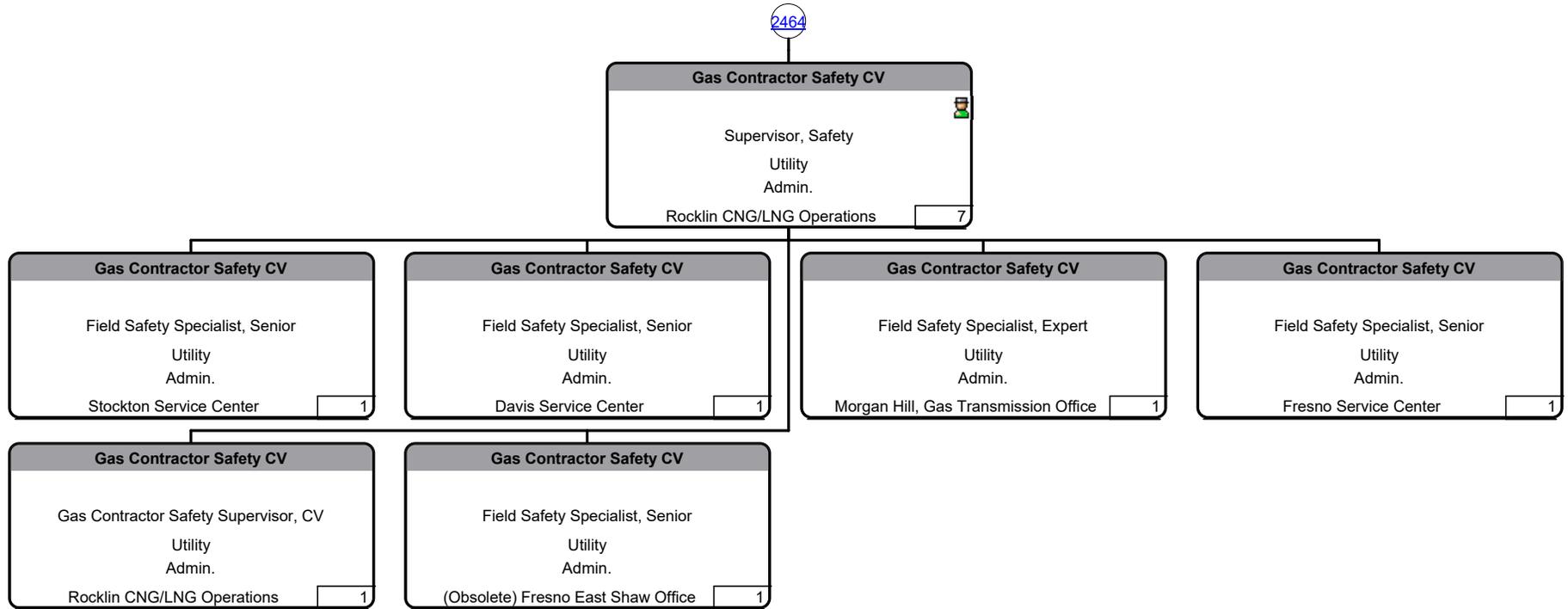


## Central Valley Gas Contractor Safety

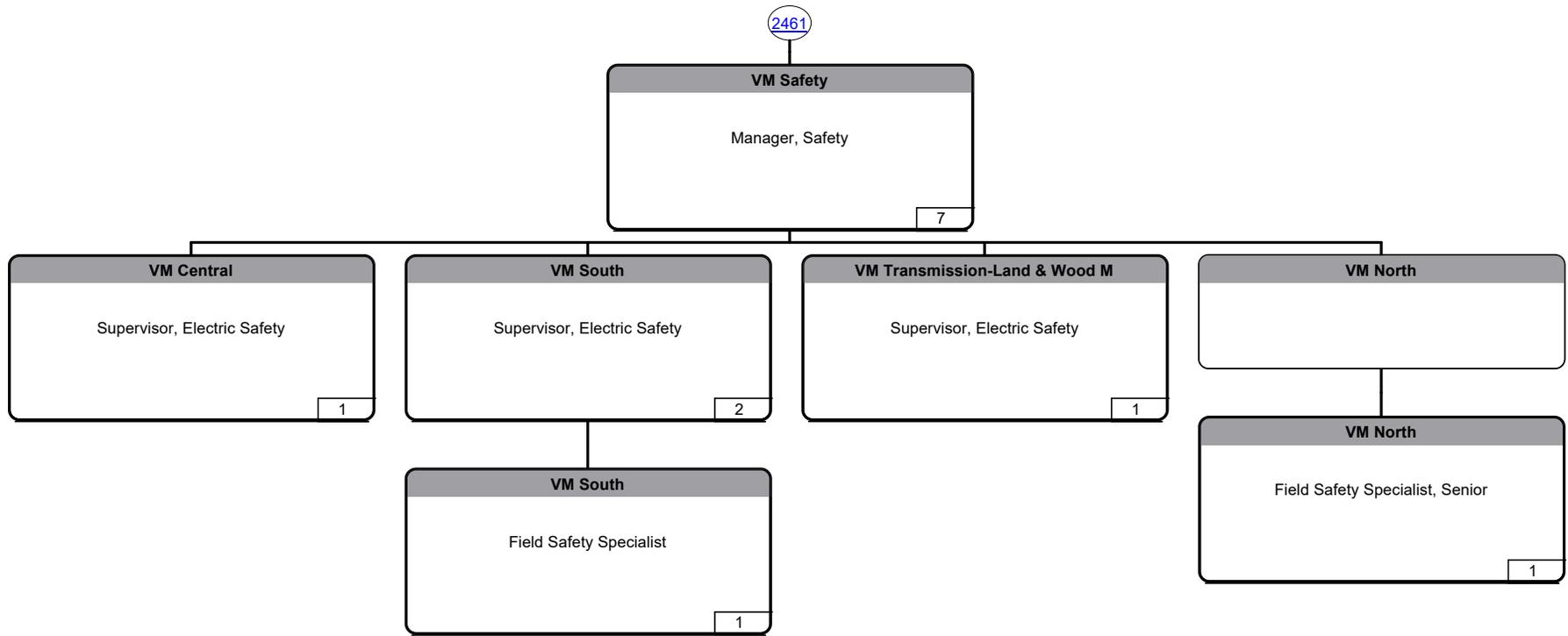


### Gas Contractor Safety CV

2464

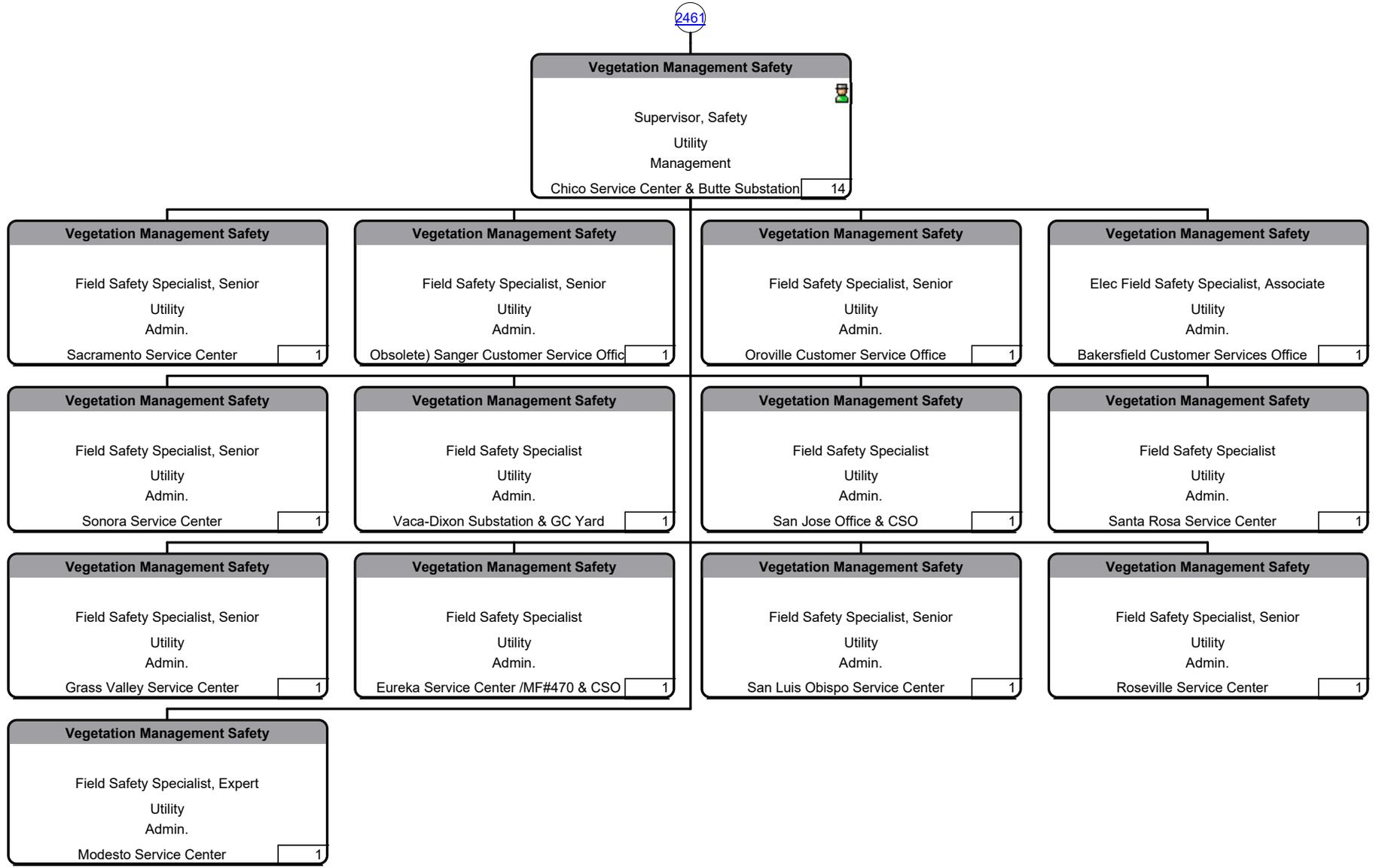


# VM Safety

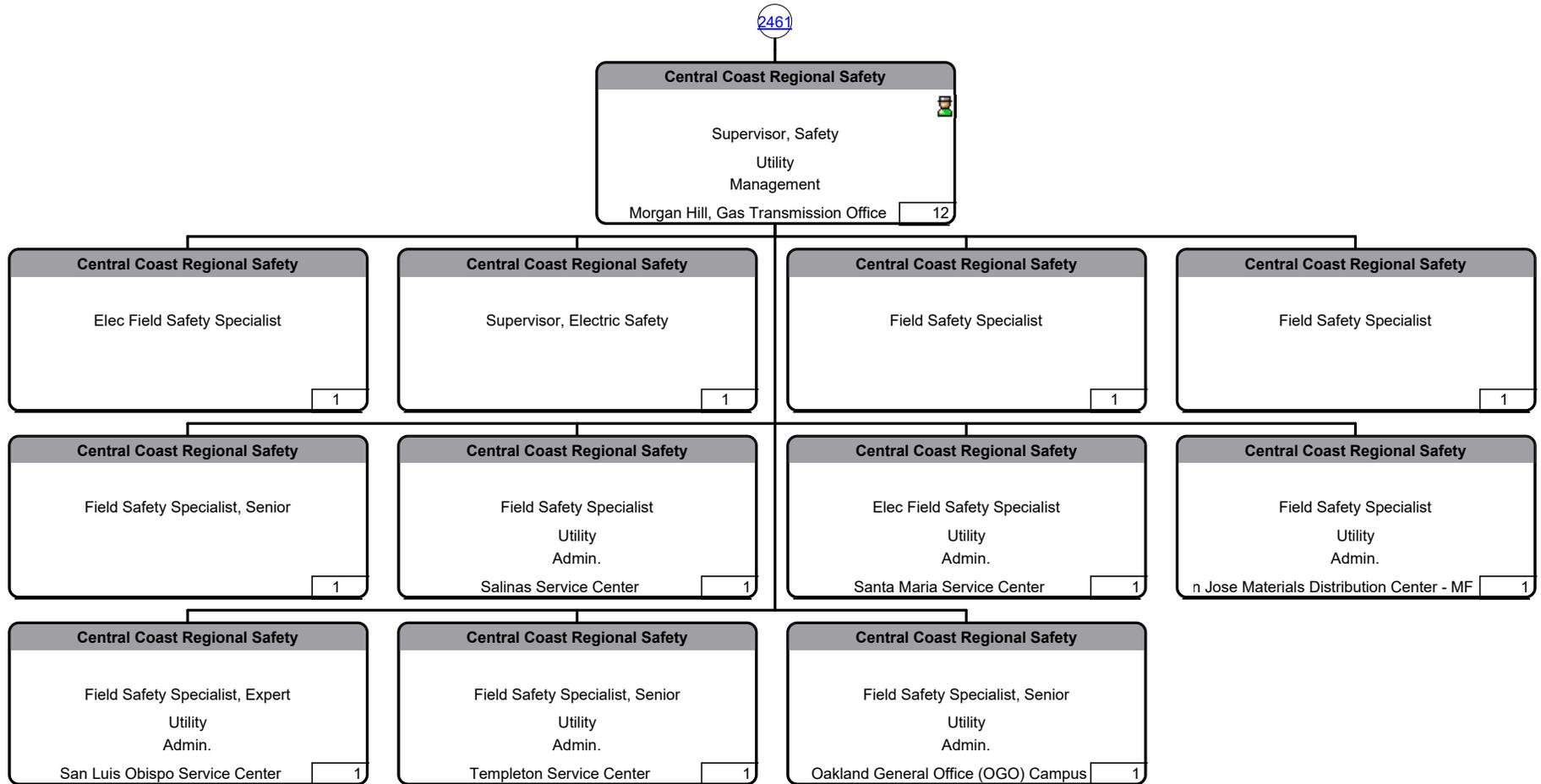


# Vegetation Management Safety

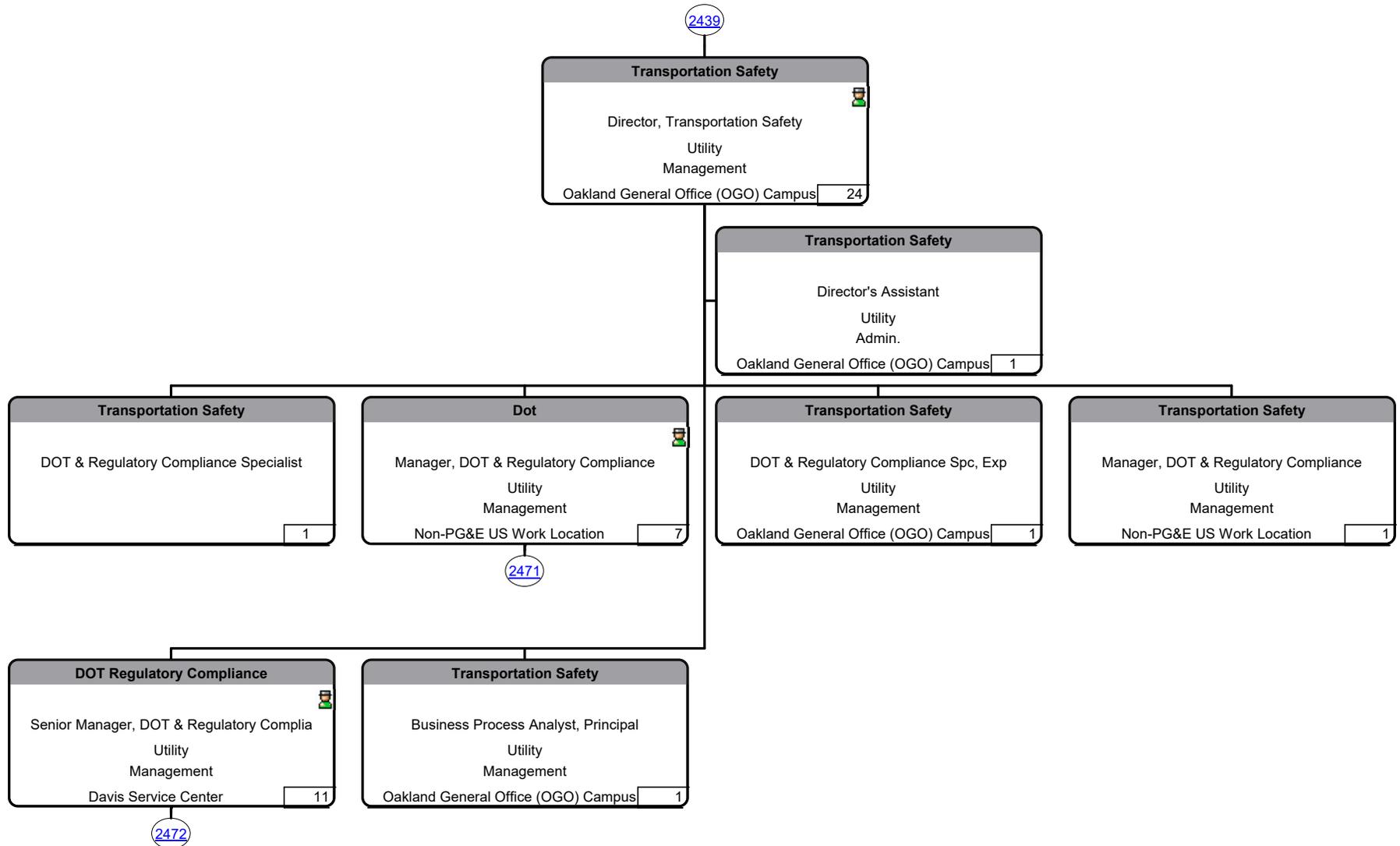
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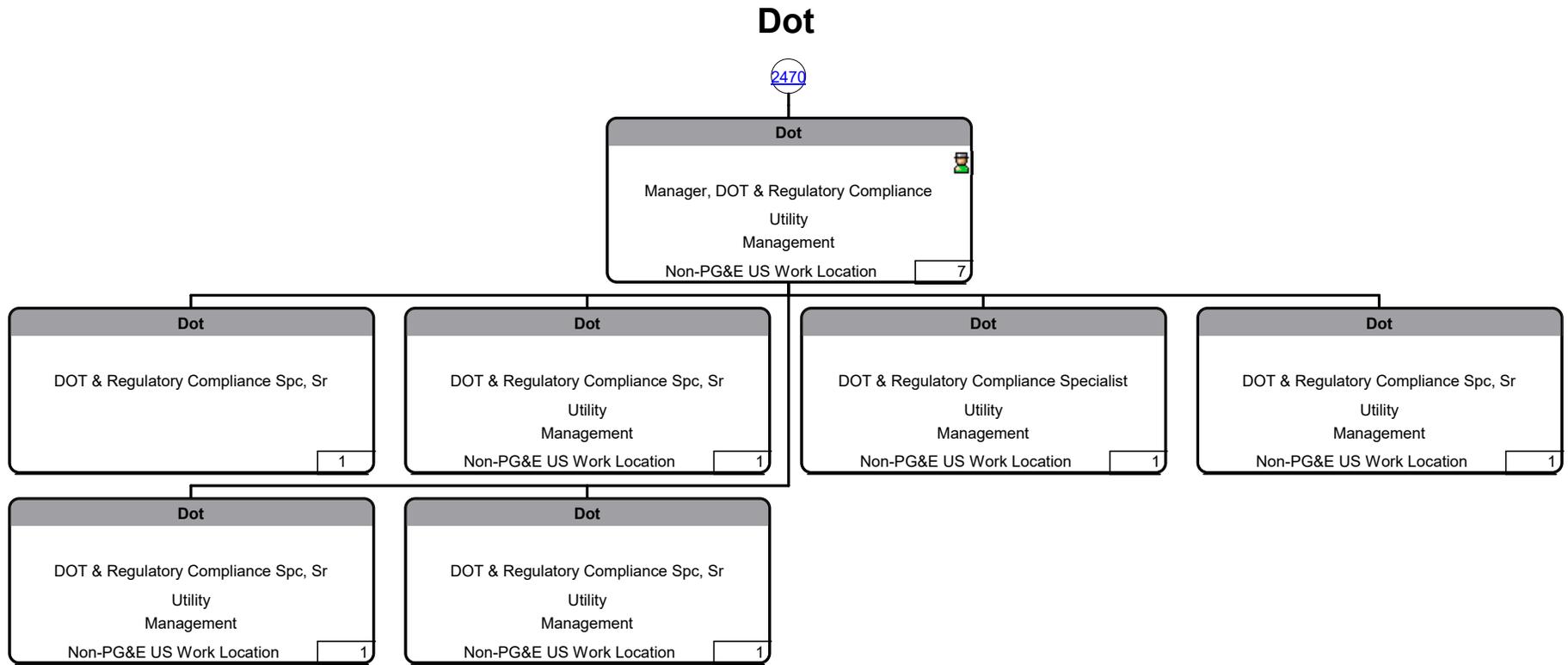


## Central Coast Regional Safety

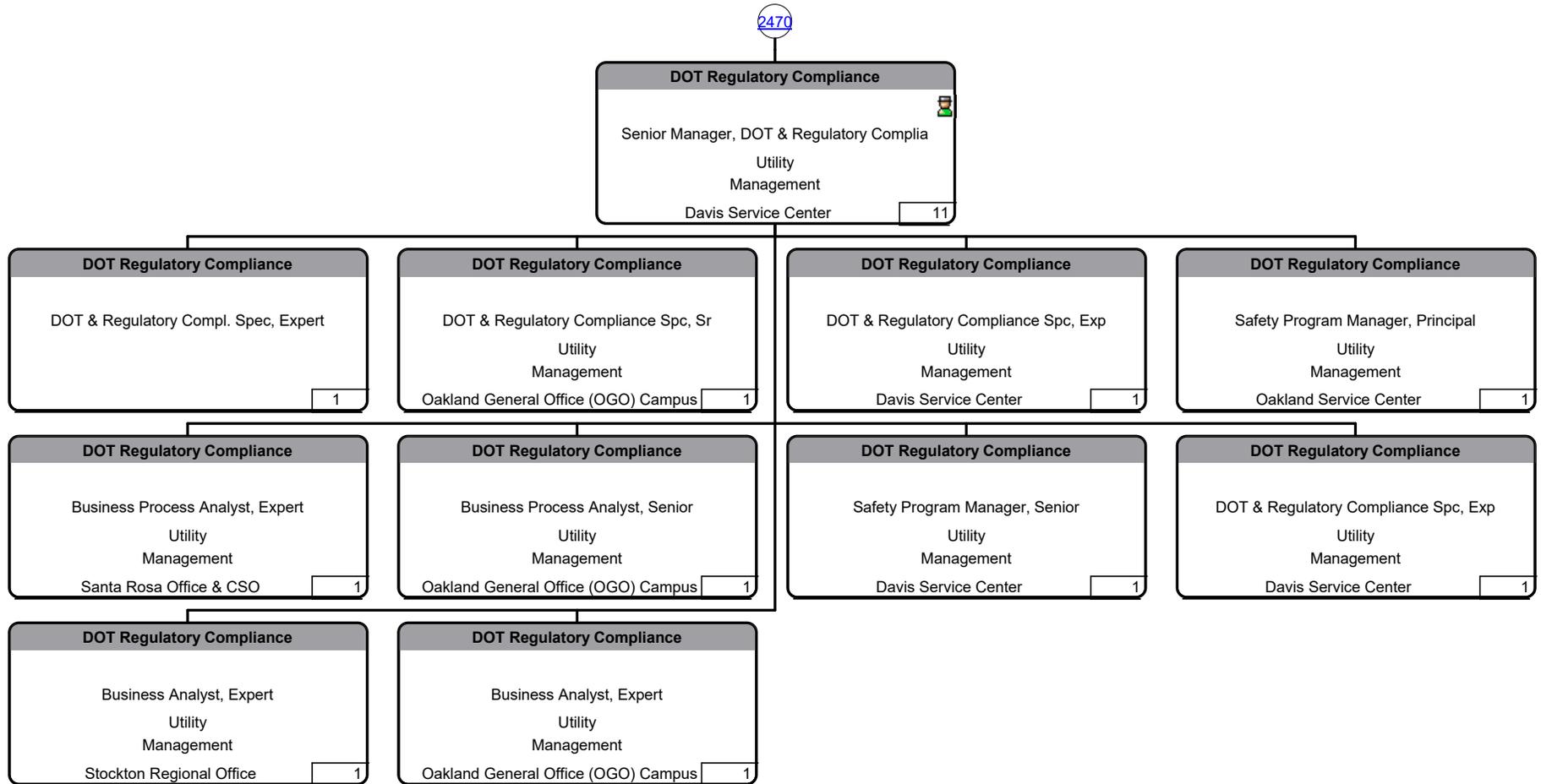


# Transportation Safety



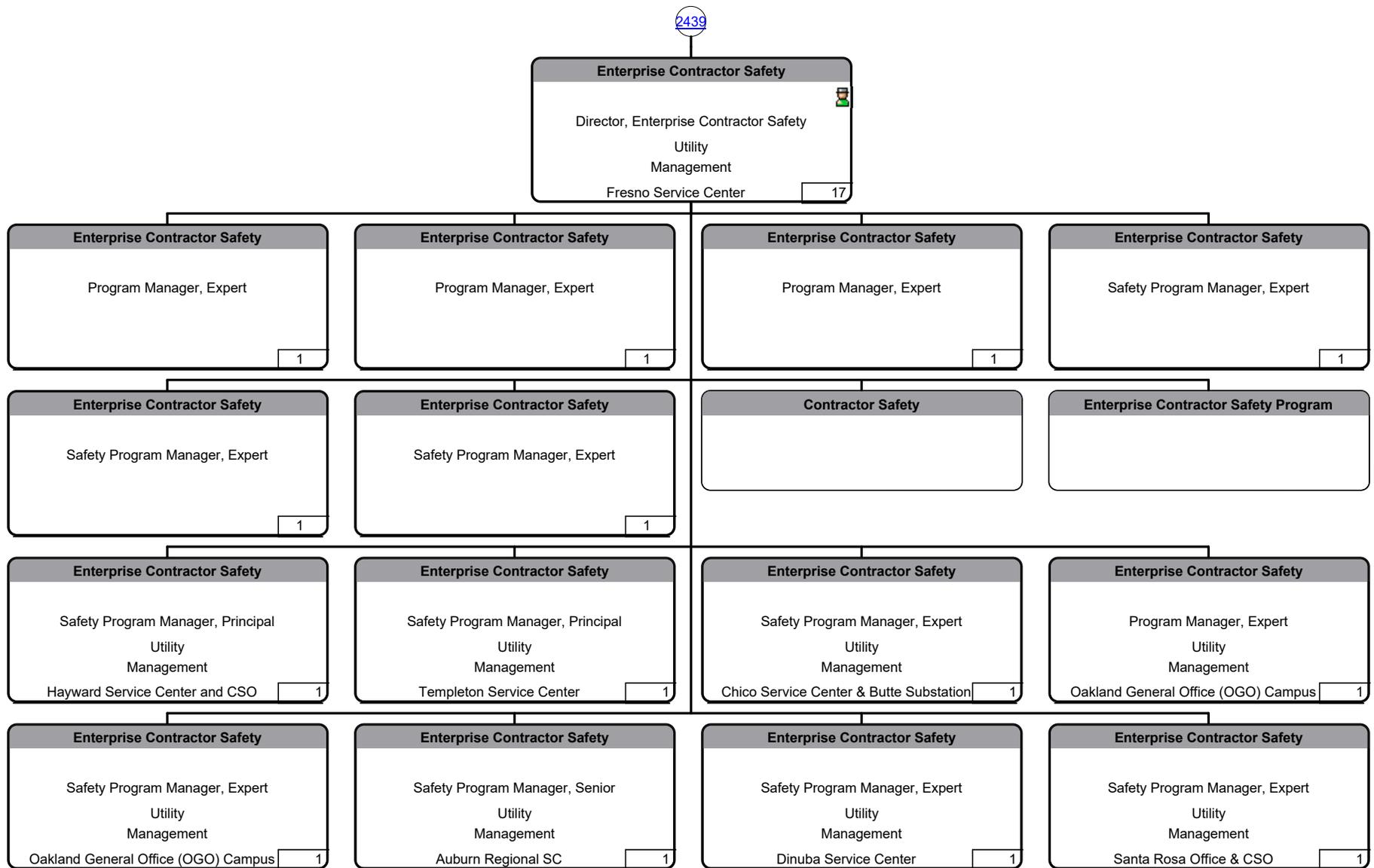


# DOT Regulatory Compliance



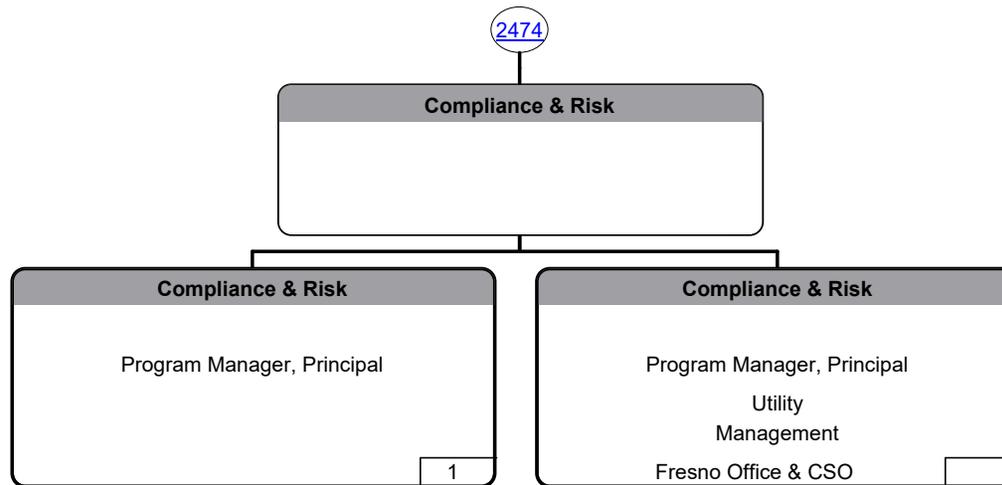
# Enterprise Contractor Safety

2439

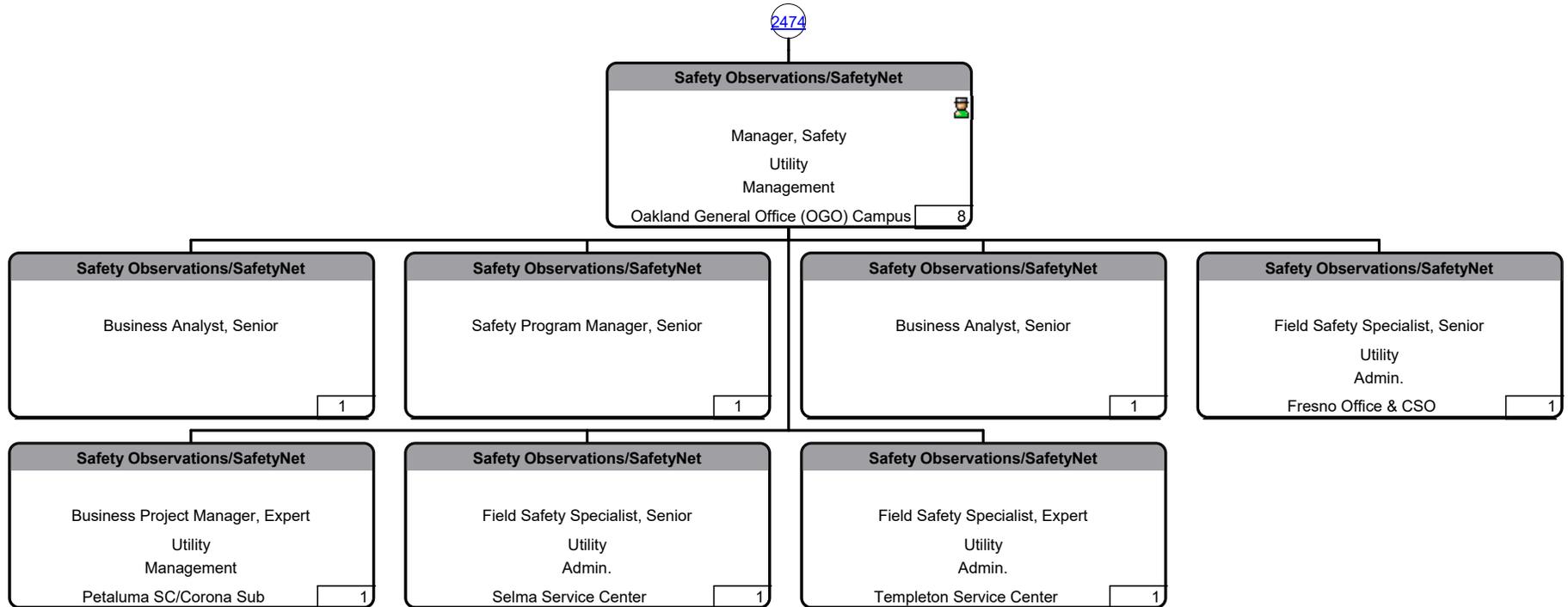




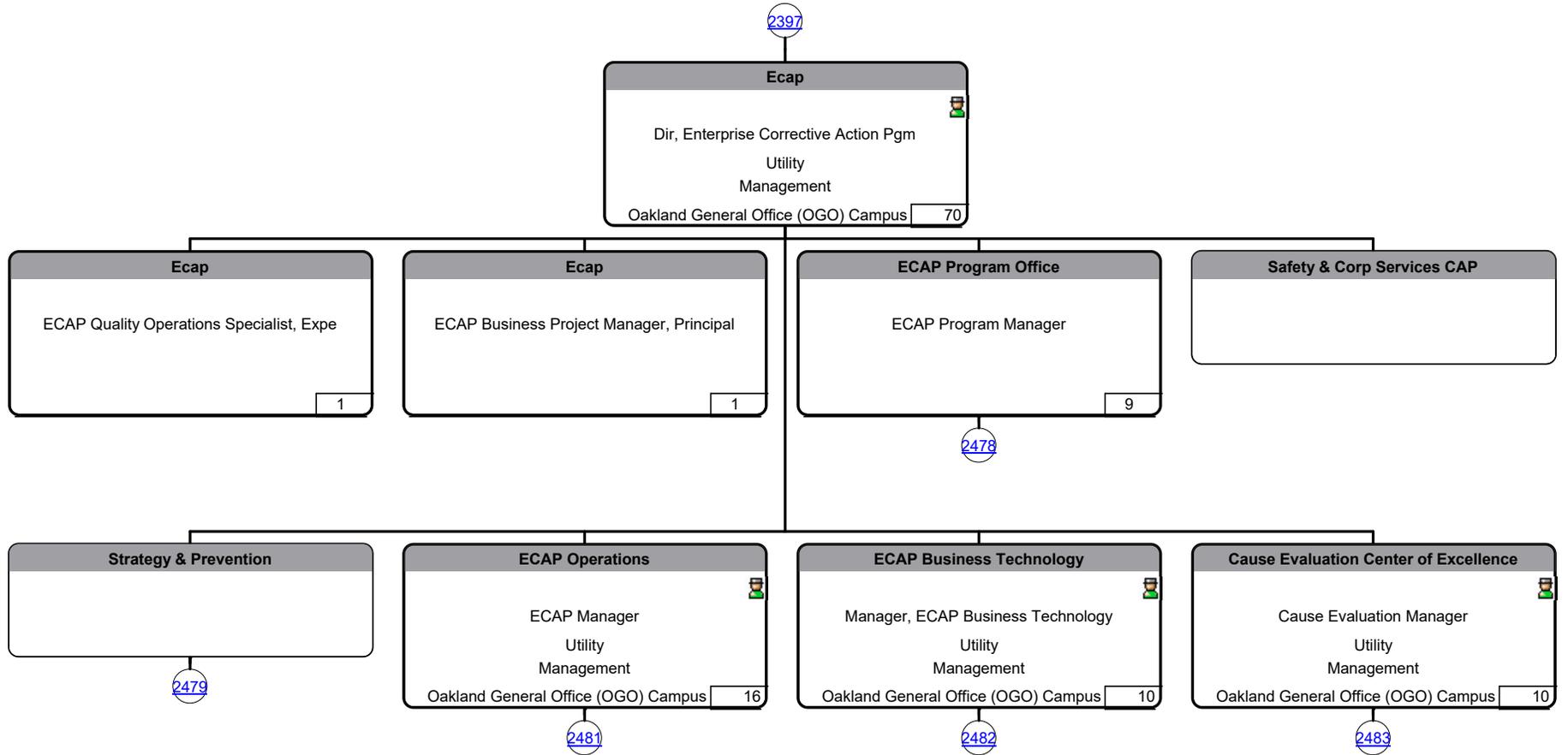
# Compliance & Risk



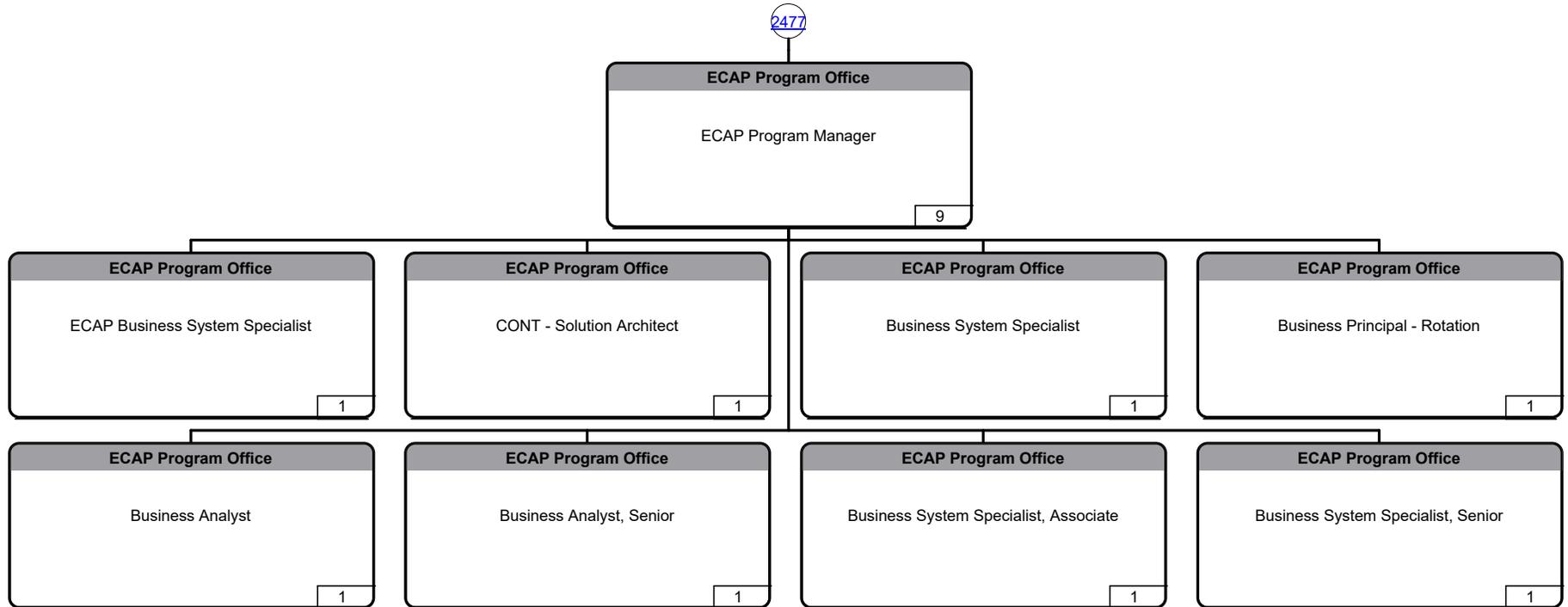
### Safety Observations/SafetyNet



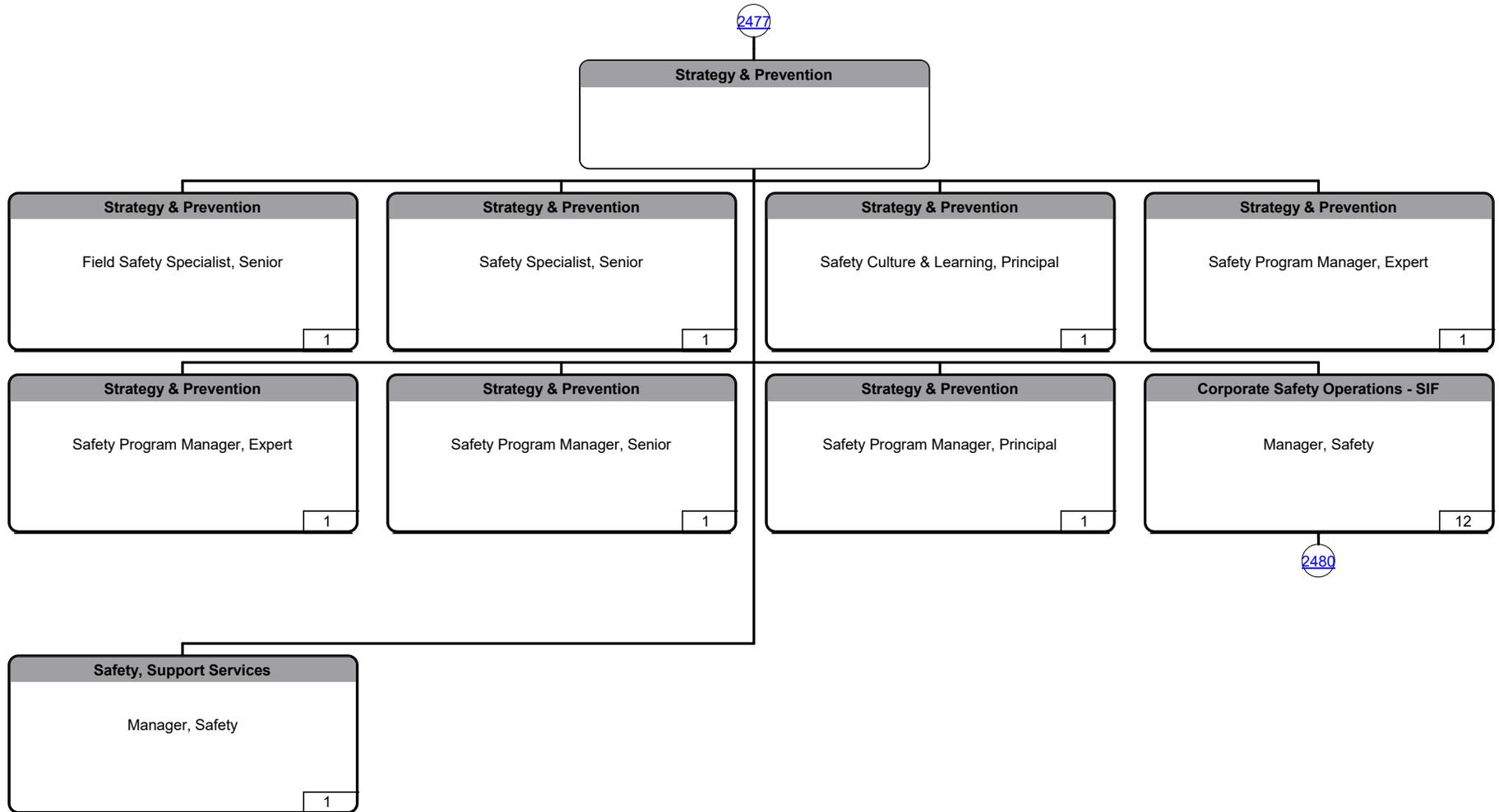
# Ecap



# ECAP Program Office



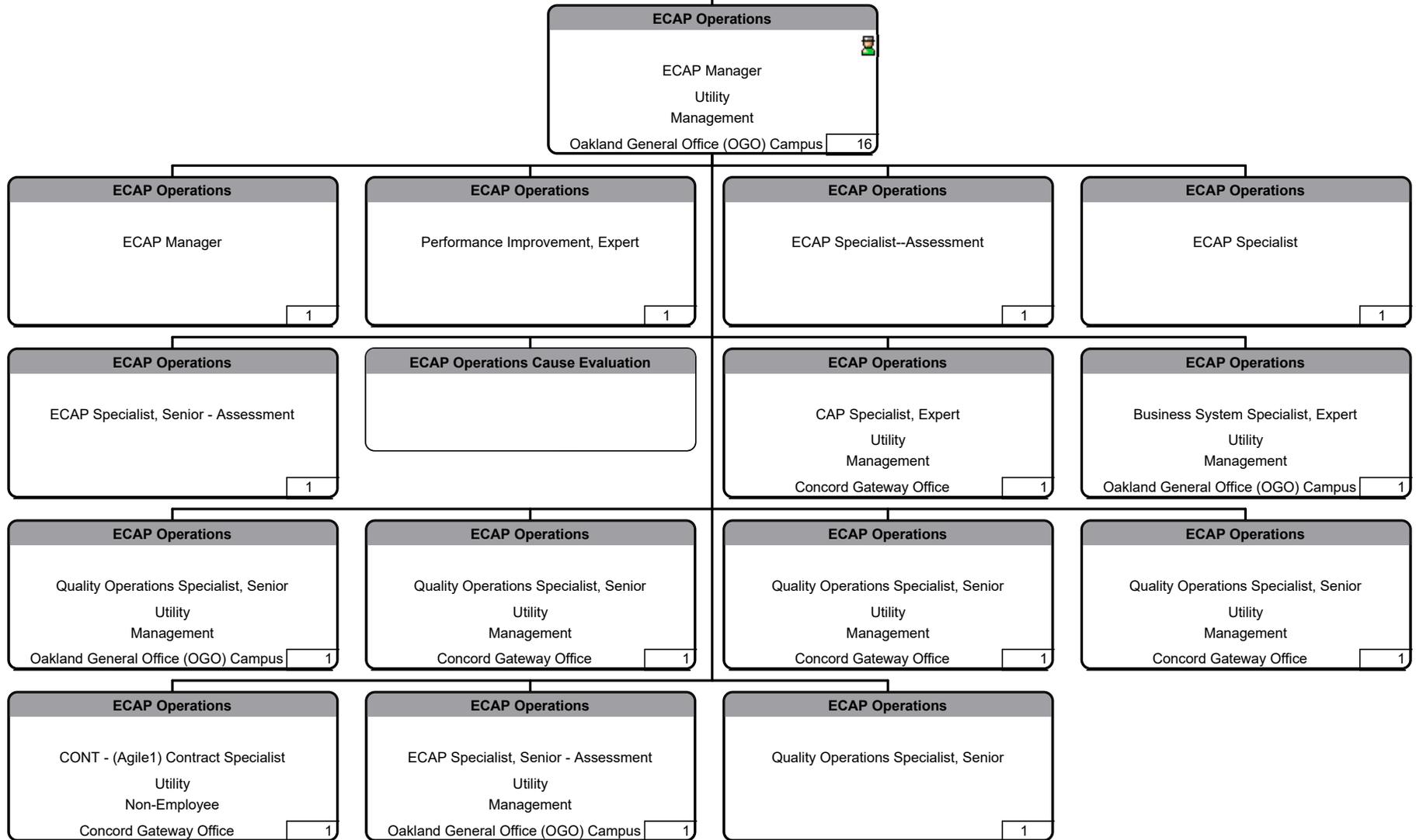
# Strategy & Prevention



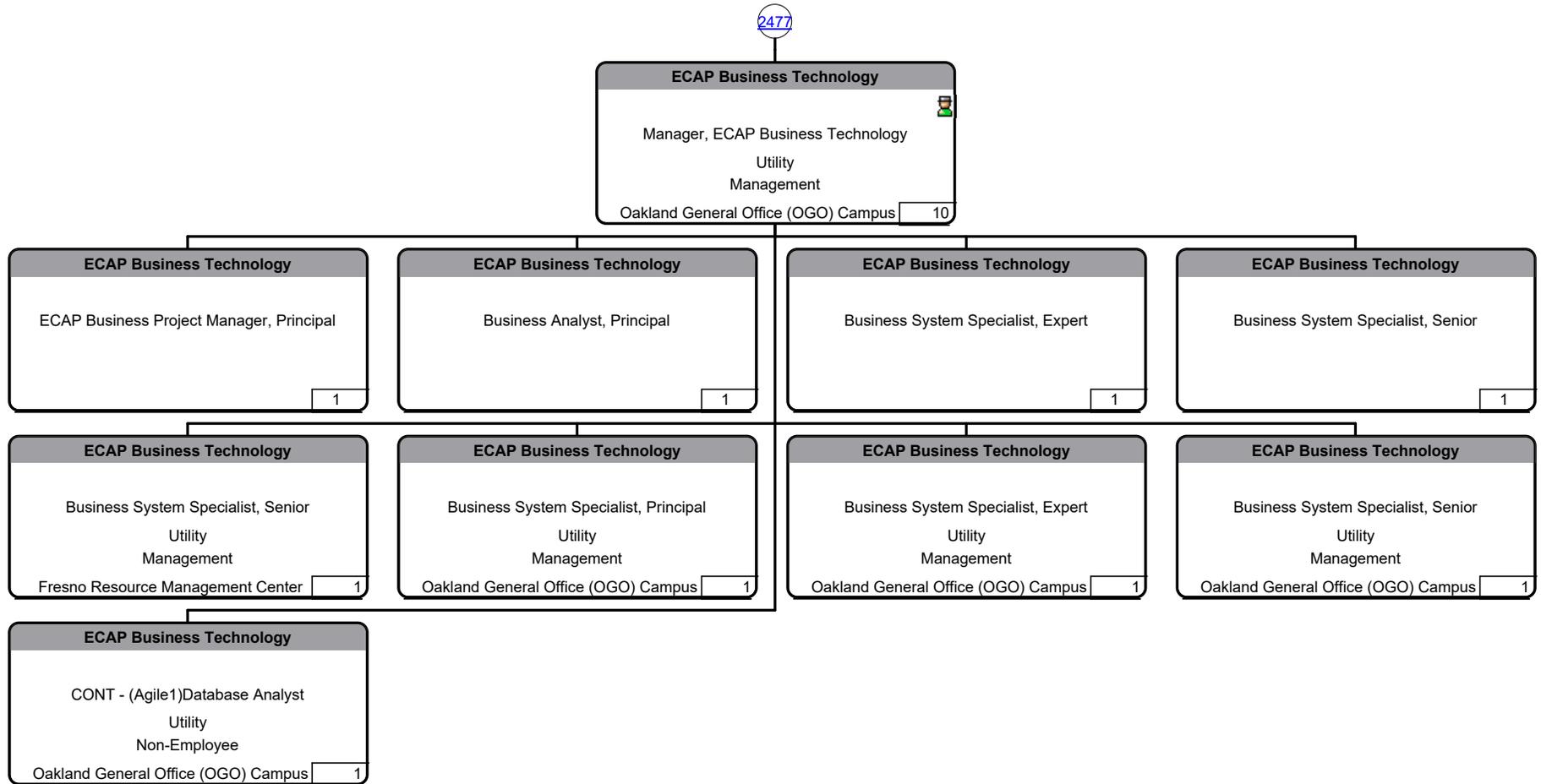


# ECAP Operations

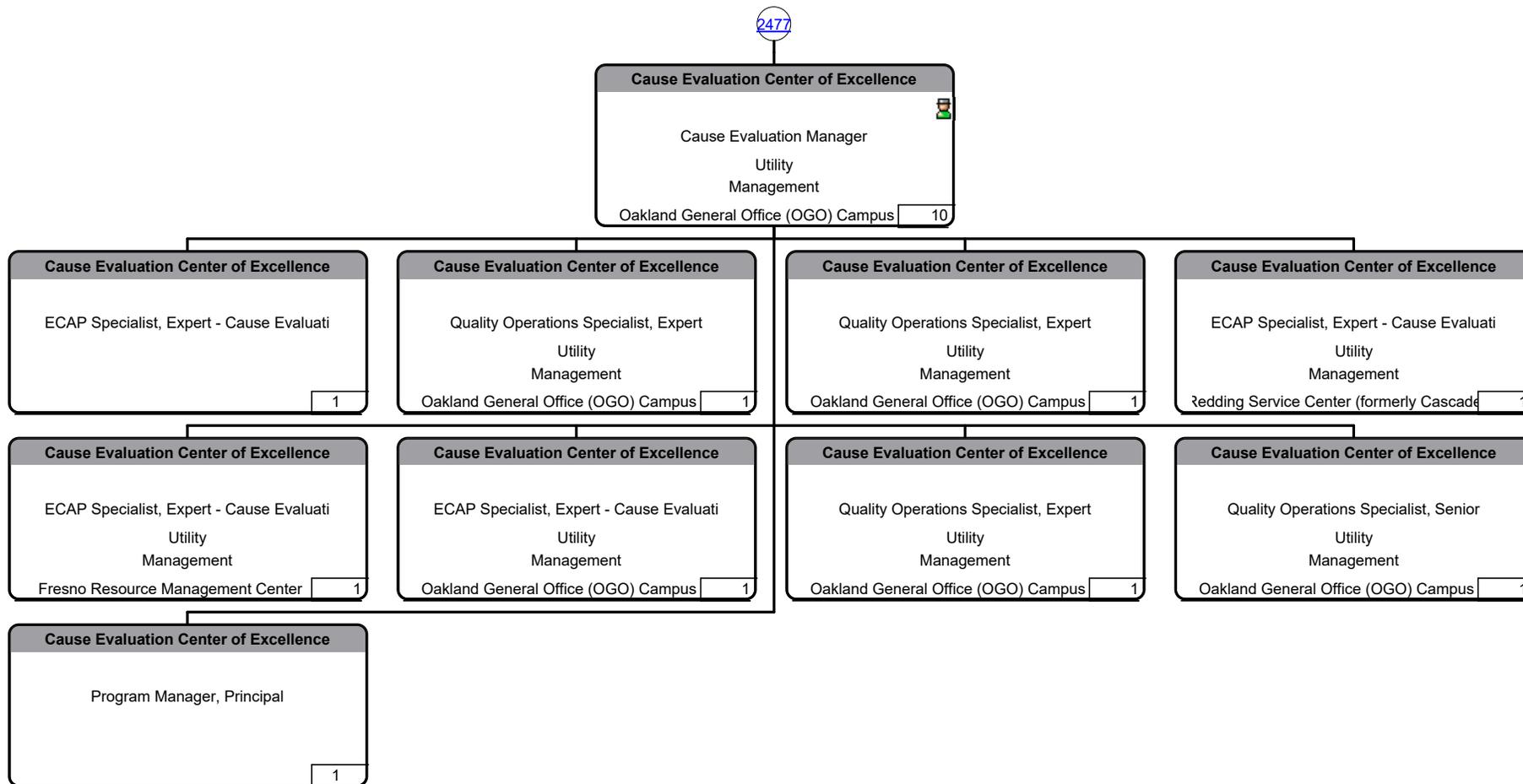
2477



# ECAP Business Technology



### Cause Evaluation Center of Excellence



## **Attachment**

Profile Training CSO and CSO.pdf

Learner Name	Training Assignmnt Code	Training Assgmnmt Title	Frequency	Requirement Category/Driver
Matthew Hayes (CSO)	CORP-9047WBT	Records & Information Management	annual	External Obligation
Matthew Hayes	ISEC-9023WBT	2023 Security & Privacy Awareness	annual	External Obligation
Matthew Hayes	CORP-0373WBT	2023 Code of Conduct Training	annual	External Obligation
Matthew Hayes	CORP-0501WBT	Sexual Harassment Prevention (WBT)	biennial	External Obligation
Matthew Hayes	SAFE-0409WBT	Office Ergonomics - Annual	annual	External Obligation
Matthew Hayes	CORP-9192WBT	Active Shooter	one-time	Business Priority
Matthew Hayes	CORP-0314	2023 Ethics & Compliance Annual Training	annual	External Obligation
Matthew Hayes	SAFE-0120WBT	COVID-19 Protocols	one-time	External Obligation
Matthew Hayes	SAFE-3002WBT	Wildfire Smoke Exposure Protection	one-time	External Obligation
Matthew Hayes	CORP-6050WBT	Introduction to CAP	one-time	Internal Policy
Matthew Hayes	CORP-3000WBT	Enhanced Oversight Leader Training	one-time	Business Priority
Matthew Hayes	CORP-9123WBT	Interviewing and Hiring	biennial	External Obligation
Matthew Hayes	TECH-0081WBT	MVS - Driving Expectations and New Laws	annual	Internal Policy
Matthew Hayes	CORP-9100WBT	Communicating with the CPUC	annual	External Obligation
Matthew Hayes	SAFE-1554WBT	Life Safety Training	annual	External Obligation
Matthew Hayes	SAFE-1500WBT	Hazard Communication	triennial	External Obligation
Matthew Hayes	ENVR-9028WBT	Environmental Leadership	triennial	Internal Policy
Matthew Hayes	SAFE-1491CRT	Pers Protective Devices & Equip CRT- OII	annual	External Obligation
Alejandro Vallejo (CRO)	SAFE-1500WBT	Hazard Communication	triennial	External Obligation
Alejandro Vallejo	CORP-9047WBT	Records & Information Management	annual	External Obligation
Alejandro Vallejo	ISEC-9023WBT	2023 Security & Privacy Awareness	annual	External Obligation
Alejandro Vallejo	CORP-0373WBT	2023 Code of Conduct Training	annual	External Obligation
Alejandro Vallejo	SAFE-0120WBT	COVID-19 Protocols	one-time	External Obligation
Alejandro Vallejo	CORP-6050WBT	Introduction to CAP	one-time	Internal Policy
Alejandro Vallejo	CORP-0314	2023 Ethics & Compliance Annual Training	annual	External Obligation
Alejandro Vallejo	SAFE-3002WBT	Wildfire Smoke Exposure Protection	one-time	External Obligation
Alejandro Vallejo	CORP-3000WBT	Enhanced Oversight Leader Training	one-time	Business Priority
Alejandro Vallejo	SAFE-1554WBT	Life Safety Training	annual	External Obligation
Alejandro Vallejo	CORP-9100WBT	Communicating with the CPUC	annual	External Obligation
Alejandro Vallejo	CORP-9192WBT	Active Shooter	one-time	Business Priority
Alejandro Vallejo	SAFE-0409WBT	Office Ergonomics - Annual	annual	External Obligation
Alejandro Vallejo	CORP-0501WBT	Sexual Harassment Prevention (WBT)	biennial	External Obligation
Alejandro Vallejo	CORP-9123WBT	Interviewing and Hiring	biennial	External Obligation
Alejandro Vallejo	TECH-0081WBT	MVS - Driving Expectations and New Laws	annual	Internal Policy
Alejandro Vallejo	CORP-9124WBT	Privacy Awareness	annual	External Obligation
Alejandro Vallejo	ENVR-9028WBT	Environmental Leadership	triennial	Internal Policy
Alejandro Vallejo	TECH-9164CRT	Distracted and Defensive Driving Cert	annual	Internal Policy

## **Attachment**

Additional Training CSO\_redacted.pdf

# PG&E Qualification Status Transcript

Report Date: 09/25/2023

Transcript Date: 09/25/2023

Employee	LAN ID	Code	Name	Quali- fied	Status	Profile Type	Date Obtained	Expiration Date
Matthew Hayes		SGI	DC-SEC - SAFEGUARDS INFORMATION	Yes	Met	Work Preventative	---	12/16/2023
Matthew Hayes		SGI100R	DC-SEC - SAFEGUARDS INFO (REQUAL)	Yes	Met	Work Preventative	11/17/2022	12/16/2023
Matthew Hayes		SGI100Q	DC-SEC - SAFEGUARD INFO QUAL SIG	Yes	Met	Work Preventative	11/17/2022	12/31/9999
Matthew Hayes		SGI100I	DC-SEC - SAFEGUARDS INFO (INITIAL)	Yes	Met	Work Preventative	11/17/2022	12/31/9999
Matthew Hayes		COG SUP VIS	DC- VALIDATE OR AUTH VISITOR ACCESS	Yes	Met	Work Preventative	---	12/29/2023
Matthew Hayes		COGSUP101	DC-COGNIZANT SUPERVISOR TRAINING	Yes	Met	Work Preventative	12/30/2022	12/29/2023
Matthew Hayes		STACCESS	DC-COG SUP SHORT TERM ACCESS	Yes	Met	Work Preventative	01/11/2018	12/31/9999
Matthew Hayes		GTR2	DC-SUP GENERAL TRAIN REQ DCPD STAFF	Yes	Met	Administrative	---	12/29/2023
Matthew Hayes		LSATSOER0901	DC-RISK ASSESSMENT & PROTECTED POSTINGS	Yes	Met	Administrative	12/30/2022	12/29/2023
Matthew Hayes		CORP-0501WBT	Sexual Harassment Prevention	Yes	Met	Administrative	02/22/2022	02/21/2024
Matthew Hayes		CORP-3000WBT	Enhanced Oversight Leader Trg (30Min)	Yes	Met	Administrative	03/29/2023	03/28/2024
Matthew Hayes		SAFE-1503WBT	Fire Danger Precautions	Yes	Met	Administrative	03/29/2023	05/15/2024
Matthew Hayes		SAFE-0409WBT	Office Ergonomics WBT	Yes	Met	Administrative	05/30/2023	05/30/2024
Matthew Hayes		SAFE-0731WBT	Hearing Conservation	Yes	Met	Administrative	08/09/2023	08/09/2024
Matthew Hayes		GPAASITE	DC- SITE SPECIFIC SUPPLEMENTAL SITE	Yes	Met	Administrative	09/11/2023	09/10/2024
Matthew Hayes		TECH-9162WBT	Defensive Driving-Small Vehicles	Yes	Met	Administrative	01/03/2023	01/03/2025
Matthew Hayes		ENVR-9028WBT	Environmental Leadership	Yes	Met	Administrative	03/24/2022	03/24/2025
Matthew Hayes		CORP-9123WBT	The PGE Compliant Hiring Training	Yes	Met	Administrative	08/09/2023	08/08/2025
Matthew Hayes		TECH-9164WBT	Distracted Driving	Yes	Met	Administrative	01/02/2023	01/02/2026
Matthew Hayes		JITTSISIP101	DC-SISIP AREA OWNERS & MANAGERS RESP.	Yes	Met	Administrative	03/28/2016	03/27/2115
Matthew Hayes		CORP-0373WBT	2023 Code of Conduct Training (45Min)	Yes	Met	Administrative	03/29/2023	12/31/9999
Matthew Hayes		CORP-0314	2023 Ethics & Compliance Annual Training	Yes	Met	Administrative	06/13/2023	12/31/9999
Matthew Hayes		ISEC-9023WBT	2023 Security & Privacy Awareness(45Min)	Yes	Met	Administrative	03/28/2023	12/31/9999
Matthew Hayes		CORP-9192WBT	Active Shooter	Yes	Met	Administrative	05/16/2016	12/31/9999
Matthew Hayes		SAFE-0120WBT	COVID-19 Protocols	Yes	Met	Administrative	09/09/2020	12/31/9999
Matthew Hayes		JFGNL	DC- NEW LEADER JOB FAMILIARIZATION GUIDE	Yes	Met	Administrative	06/12/2020	12/31/9999
Matthew Hayes		GPAAHHR	DC- SITE SPECIFIC SUPPLEMENTAL HHR	Yes	Met	Administrative	01/03/2017	12/31/9999
Matthew Hayes		GPSF143	DC-BASE STATION OPERATOR LICENSE (RADIO)	Yes	Met	Administrative	04/06/2016	12/31/9999
Matthew Hayes		GCHKQUALS	DC-CHECKING QUALIFICATIONS	Yes	Met	Administrative	03/24/2016	12/31/9999
Matthew Hayes		LSATITCAP101	DC-CORRECTIVE ACTION PROGRAM OVERVIEW	Yes	Met	Administrative	04/11/2016	12/31/9999

Matthew Hayes	JITTL2302	DC-ELT Lean Training	Yes	Met	Administrative	03/28/2023	12/31/9999
Matthew Hayes	FSSESE	DC-EMERGENCY EYEWASH & SHOWER EQUIPMENT	Yes	Met	Administrative	04/06/2016	12/31/9999
Matthew Hayes	LDFLT	DC-FACILITATIVE LEADERSHIP TRAINING	Yes	Met	Administrative	05/31/2016	12/31/9999
Matthew Hayes	FRCARE	DC-FR CLOTHING CARE AND MAINTENANCE	Yes	Met	Administrative	08/11/2021	12/31/9999
Matthew Hayes	JITTFD23	DC-Fitness For Duty Changes 2023	Yes	Met	Administrative	09/17/2023	12/31/9999
Matthew Hayes	CYBERSEC002	DC-GENERIC CYBER SECURITY AWARENESS	Yes	Met	Administrative	03/30/2016	12/31/9999
Matthew Hayes	CCS11	DC-PEER TO PEER COACHING	Yes	Met	Administrative	05/31/2016	12/31/9999
Matthew Hayes	CORP-9947WBT	DCPP - RIM	Yes	Met	Administrative	07/05/2023	12/31/9999
Matthew Hayes	FSSFALL	GENERIC FALL PROTECTION	Yes	Met	Administrative	03/24/2016	12/31/9999
Matthew Hayes	GHPES101	GENERIC HU FULL COLLECTION	Yes	Met	Administrative	03/24/2016	12/31/9999
Matthew Hayes	MG0900	GENERIC MATERIAL HANDLING	Yes	Met	Administrative	04/11/2016	12/31/9999
Matthew Hayes	SAFE-0615WBT	Heat Illness Prevention Training	Yes	Met	Administrative	03/30/2016	12/31/9999
Matthew Hayes	SAFE-3002WBT	Wildfire Smoke Protection	Yes	Met	Administrative	09/17/2019	12/31/9999
Matthew Hayes	COG SUP	DC-VALIDATE OR AUTHORIZE UNESC ACCESS	Yes	Met	Work Preventative	- - -	12/29/2023
Matthew Hayes	COGSUP101	DC-COGNIZANT SUPERVISOR TRAINING	Yes	Met	Work Preventative	12/30/2022	12/29/2023
Matthew Hayes	LTACCESS	DC-COG SUP LONG TERM ACCESS	Yes	Met	Work Preventative	01/11/2018	12/31/9999
Matthew Hayes	FFDSUP	DC-GET - FITNESS-FOR-DUTY SUPERVISOR	Yes	Met	Work Preventative	- - -	01/03/2024
Matthew Hayes	GFFDSUPFATR	DC-FATIGUE MANAGEMENT FOR SUP. (REQUAL)	Yes	Met	Work Preventative	01/04/2023	01/03/2024
Matthew Hayes	GFFD100R	DC-GET - FITNESS FOR DUTY REQUAL	Yes	Met	Work Preventative	01/05/2023	01/04/2024
Matthew Hayes	GFFD100I	DC-GET - FITNESS FOR DUTY INITIAL	Yes	Met	Work Preventative	01/05/2023	01/04/2025
Matthew Hayes	GPAA100NR	DC-GENERIC PLANT ACCESS TRNG UTIL REQ	Yes	Met	Work Preventative	03/01/2021	02/28/2025
Matthew Hayes	GPAA100V	DC-REINVESTIGATION TRAIN ACT.	Yes	Met	Work Preventative	04/07/2022	04/06/2027
Matthew Hayes	GPAA100N	DC-GENERIC PLANT ACCESS TRNG UTIL INI	Yes	Met	Work Preventative	03/01/2021	02/29/2028
Matthew Hayes	GFFDSUPFATI	DC-FATIGUE MANAGEMENT FOR SUP (INITIAL)	Yes	Met	Work Preventative	03/24/2016	12/31/9999
Matthew Hayes	GPAA100QD	DC-UNESCORTED ACCESS: PROT & VITAL AREAS	Yes	Met	Work Preventative	03/23/2016	12/31/9999
Matthew Hayes	PAA	DC-UNESCORTED ACCESS TO THE DCPA PA	Yes	Met	Work Preventative	- - -	01/04/2024
Matthew Hayes	GFFD100R	DC-GET - FITNESS FOR DUTY REQUAL	Yes	Met	Work Preventative	01/05/2023	01/04/2024
Matthew Hayes	GFFD100I	DC-GET - FITNESS FOR DUTY INITIAL	Yes	Met	Work Preventative	01/05/2023	01/04/2025
Matthew Hayes	GPAA100NR	DC-GENERIC PLANT ACCESS TRNG UTIL REQ	Yes	Met	Work Preventative	03/01/2021	02/28/2025
Matthew Hayes	GPAA100V	DC-REINVESTIGATION TRAIN ACT.	Yes	Met	Work Preventative	04/07/2022	04/06/2027
Matthew Hayes	GPAA100N	DC-GENERIC PLANT ACCESS TRNG UTIL INI	Yes	Met	Work Preventative	03/01/2021	02/29/2028
Matthew Hayes	GPAA100QD	DC-UNESCORTED ACCESS: PROT & VITAL AREAS	Yes	Met	Work Preventative	03/23/2016	12/31/9999
Matthew Hayes	CORP-3000WBT	Enhanced Oversight Leader Trg	Yes	Met	Administrative	- - -	03/28/2024
Matthew Hayes	CORP-3000WBT	Enhanced Oversight Leader Trg (30Min)	Yes	Met	Administrative	03/29/2023	03/28/2024
Matthew Hayes	SAFE-1503	Fire Danger Precautions	Yes	Met	Administrative	- - -	05/15/2024
Matthew Hayes	SAFE-1503WBT	Fire Danger Precautions	Yes	Met	Administrative	03/29/2023	05/15/2024
Matthew Hayes	GTR-CORP	DC- CORPORATE GENERAL TRAINING REQ	Yes	Met	Administrative	- - -	05/30/2024
Matthew Hayes	SAFE-0409WBT	Office Ergonomics WBT	Yes	Met	Administrative	05/30/2023	05/30/2024

Matthew Hayes		SAFE-0731WBT	Hearing Conservation	Yes	Met	Administrative	08/09/2023	08/09/2024
Matthew Hayes		TECH-9162WBT	Defensive Driving-Small Vehicles	Yes	Met	Administrative	01/03/2023	01/03/2025
Matthew Hayes		ENVR-9028WBT	Environmental Leadership	Yes	Met	Administrative	03/24/2022	03/24/2025
Matthew Hayes		TECH-9164WBT	Distracted Driving	Yes	Met	Administrative	01/02/2023	01/02/2026
Matthew Hayes		CORP-0373WBT	2023 Code of Conduct Training (45Min)	Yes	Met	Administrative	03/29/2023	12/31/9999
Matthew Hayes		CORP-0314	2023 Ethics & Compliance Annual Training	Yes	Met	Administrative	06/13/2023	12/31/9999
Matthew Hayes		ISEC-9023WBT	2023 Security & Privacy Awareness(45Min)	Yes	Met	Administrative	03/28/2023	12/31/9999
Matthew Hayes		CORP-9192WBT	Active Shooter	Yes	Met	Administrative	05/16/2016	12/31/9999
Matthew Hayes		SAFE-0120WBT	COVID-19 Protocols	Yes	Met	Administrative	09/09/2020	12/31/9999
Matthew Hayes		CORP-9947WBT	DCPP - RIM	Yes	Met	Administrative	07/05/2023	12/31/9999
Matthew Hayes		SAFE-3002WBT	Wildfire Smoke Protection	Yes	Met	Administrative	09/17/2019	12/31/9999
Matthew Hayes		GHPE102	DC-HUMAN PERFORMANCE AND SAFETY TRAINING	Yes	Met	Administrative	---	07/31/2024
Matthew Hayes		GHPE102	DC-HUMAN PERFORMANCE AND SAFETY TRAINING	Yes	Met	Administrative	08/01/2022	07/31/2024
Matthew Hayes		CORP-TECH	Motor Vehicle Safety Training	Yes	Met	Administrative	---	01/03/2025
Matthew Hayes		TECH-9162WBT	Defensive Driving-Small Vehicles	Yes	Met	Administrative	01/03/2023	01/03/2025
Matthew Hayes		TECH-9164WBT	Distracted Driving	Yes	Met	Administrative	01/02/2023	01/02/2026
Matthew Hayes		RAD WORKER	DC-FULLY QUAL RAD CONTROLLED AREA ACCESS	Yes	Met	Work Preventative	---	02/28/2025
Matthew Hayes		GRPA400NR	DC-GENERIC RADIATION WRKER TRNG UTIL RQL	Yes	Met	Work Preventative	03/01/2021	02/28/2025
Matthew Hayes		GRPA400N	DC-GENERIC RADIATION WRKER TRNG UTIL INI	Yes	Met	Work Preventative	03/01/2021	02/29/2028
Matthew Hayes		GABC100	DC-DOS - WHOLE BODY COUNT	Yes	Met	Work Preventative	03/22/2016	12/31/9999
Matthew Hayes		GRPC700I	DC-GET - PROTECTIVE CLOTHING (INITIAL)	Yes	Met	Work Preventative	03/24/2016	12/31/9999
Matthew Hayes		GRCAQ	DC-RAD WORKER FILE REVIEW	Yes	Met	Work Preventative	03/23/2016	12/31/9999
Matthew Hayes		CORPHIRING	PGE COMPLIANT HIRING TRAINING	Yes	Met	Administrative	---	08/08/2025
Matthew Hayes		CORP-9123WBT	The PGE Compliant Hiring Training	Yes	Met	Administrative	08/09/2023	08/08/2025
Matthew Hayes		COMP-ETHICS	COMPLIANCE AND ETHICS	Yes	Met	Administrative	---	12/31/9999
Matthew Hayes		CORP-0314	2023 Ethics & Compliance Annual Training	Yes	Met	Administrative	06/13/2023	12/31/9999
Matthew Hayes		COVID-19	COVID-19 Protocols	Yes	Met	Administrative	---	12/31/9999
Matthew Hayes		SAFE-0120WBT	COVID-19 Protocols	Yes	Met	Administrative	09/09/2020	12/31/9999
Matthew Hayes		DCPPSQAWBT	DC - SQA General Awareness	Yes	Met	Administrative	---	12/31/9999
Matthew Hayes		DCPPSQAWBT	DC-DCPP SQA General Awareness	Yes	Met	Administrative	08/29/2016	12/31/9999
Matthew Hayes		CODE-CONDUCT	DC- CORPORATE CODE OF CONDUCT	Yes	Met	Administrative	---	12/31/9999
Matthew Hayes		CORP-0373WBT	2023 Code of Conduct Training (45Min)	Yes	Met	Administrative	03/29/2023	12/31/9999
Matthew Hayes		ANSI 402-18	DC-ANSI 3.1-1978 RESP INDEPEND REV.	Yes	Met	Work Preventative	---	12/31/9999
Matthew Hayes		ANS 402-18	DC-ANSI 3.1-1978 SUPV RESP INDEPEND REV.	Yes	Met	Work Preventative	07/19/2018	12/31/9999
Matthew Hayes		ANSI 402-17	DC-ANSI 3.1-1978 SEC 4.7.2 STAFF SPECIAL	Yes	Met	Work Preventative	---	12/31/9999
Matthew Hayes		ANS 402-17	DC-ANSI 3.1-1978 NQS STAFF SPECIALISTS	Yes	Met	Work Preventative	09/26/2016	12/31/9999
Matthew Hayes		ANSI 402-19	DC-ANSI 3.1-1981 DIR OF RAD PROTECTION	Yes	Met	Work Preventative	---	12/31/9999
Matthew Hayes		ANS 402-19	DC-ANSI 3.1-1981 DIR OF RAD PROTECTION	Yes	Met	Work Preventative	09/15/2016	12/31/9999

Matthew Hayes	ANSI 402-01	DC-ANSI/ANS 3.-1978 PLANT MANAGER	Yes	Met	Work Preventative	---	12/31/9999
Matthew Hayes	ANS 402-01	DC-ANSI /ANS 3.-1978 PLANT MANAGERS	Yes	Met	Work Preventative	01/07/2022	12/31/9999
Matthew Hayes	ANSI 402-06	DC-ANSI/ANS 3.1-1978 SUP NOT REQ NRC LIC	Yes	Met	Work Preventative	---	12/31/9999
Matthew Hayes	ANS 402-06	DC-ANSI/ANS 3.1-1978 SUP NOT REQ NRC LIC	Yes	Met	Work Preventative	04/11/2016	12/31/9999
Matthew Hayes	JFGCARB	DC-CARB MEMBER JFG	Yes	Met	Administrative	---	12/31/9999
Matthew Hayes	LSATITACE	DC-APPARENT CAUSE EVALUATIONS	Yes	Met	Administrative	04/02/2018	12/31/9999
Matthew Hayes	JFGCARB	DC-CARB MEMBER JFG	Yes	Met	Administrative	06/20/2018	12/31/9999
Matthew Hayes	CEAPPQ	DC-CAUSE EVALUATION APPROVER	Yes	Met	Administrative	04/03/2018	12/31/9999
Matthew Hayes	RCAPPRQ	DC-ROOT CAUSE APPROVER	Yes	Met	Administrative	06/07/2018	12/31/9999
Matthew Hayes	CEAPPQ	DC-CAUSE EVALUATION APPROVER	Yes	Met	Work Preventative	---	12/31/9999
Matthew Hayes	LSATITACE	DC-APPARENT CAUSE EVALUATIONS	Yes	Met	Work Preventative	04/02/2018	12/31/9999
Matthew Hayes	CEAPPQ	DC-CAUSE EVALUATION APPROVER	Yes	Met	Work Preventative	04/03/2018	12/31/9999
Matthew Hayes	QP	DC-ELECTRICAL SAFETY - QUALIFIED PERSON	Yes	Met	Work Preventative	---	12/31/9999
Matthew Hayes	ME000400	GENERAL ELECTRICAL SAFETY OVERVIEW	Yes	Met	Work Preventative	03/31/2016	12/31/9999
Matthew Hayes	EROMENTORQ	DC-ERO Mentoring Qualification	Yes	Met	Administrative	---	12/31/9999
Matthew Hayes	EROMENTOR	DC-ERO MENTORING	Yes	Met	Administrative	05/23/2018	12/31/9999
Matthew Hayes	FRCARE	DC-FR CLOTHING CARE AND MAINTENANCE	Yes	Met	Administrative	---	12/31/9999
Matthew Hayes	FRCARE	DC-FR CLOTHING CARE AND MAINTENANCE	Yes	Met	Administrative	08/11/2021	12/31/9999
Matthew Hayes	JITTFD23	DC-Fitness For Duty Changes 2023	Yes	Met	Administrative	---	12/31/9999
Matthew Hayes	JITTFD23	DC-Fitness For Duty Changes 2023	Yes	Met	Administrative	09/17/2023	12/31/9999
Matthew Hayes	PRITR	DC-PLANT MANAGER DESIGNATED ITR	Yes	Met	Work Preventative	---	12/31/9999
Matthew Hayes	LSATTB0503	DC-NCR2180, UNEXPECTED RCS LEVEL CHANGE	Yes	Met	Work Preventative	06/14/2016	12/31/9999
Matthew Hayes	TPRO03	DC-NORMAL REVISIONS XPRS/OTSCS/ECS	Yes	Met	Work Preventative	06/14/2016	12/31/9999
Matthew Hayes	PRITR	DC-PLANT MGR DESIGNATED ITR QUAL SIG	Yes	Met	Work Preventative	10/03/2016	12/31/9999
Matthew Hayes	TPRO01	DC-PROC - INTRODUCTION TO PROCEDURES	Yes	Met	Work Preventative	06/14/2016	12/31/9999
Matthew Hayes	TPRO02	DC-PROC - TRAINING AND QUAL REQUIREMENTS	Yes	Met	Work Preventative	06/14/2016	12/31/9999
Matthew Hayes	TPROC	DC-PROC. SPONSOR/PREPARER QUAL SIG	Yes	Met	Work Preventative	06/14/2016	12/31/9999
Matthew Hayes	PAOTH	DC-PROC-APP STP/NOT EPIP/OPS SECT WRK	Yes	Met	Work Preventative	---	12/31/9999
Matthew Hayes	PAOTH	DC-PROC-APPROVE PROC INCLUDING STP'S	Yes	Met	Work Preventative	11/30/2016	12/31/9999
Matthew Hayes	PASRO	DC-PROC-PLNT MGR DESIG TO APP ALL PROC	Yes	Met	Work Preventative	---	12/31/9999
Matthew Hayes	PASRO	DC-PLT MGR DESIG. TO APPROVE PROC	Yes	Met	Work Preventative	07/19/2018	12/31/9999
Matthew Hayes	TPROC	DC-PROCEDURE SPONSOR AND/OR PREPARER	Yes	Met	Work Preventative	---	12/31/9999
Matthew Hayes	LSATTB0503	DC-NCR2180, UNEXPECTED RCS LEVEL CHANGE	Yes	Met	Work Preventative	06/14/2016	12/31/9999
Matthew Hayes	TPRO03	DC-NORMAL REVISIONS XPRS/OTSCS/ECS	Yes	Met	Work Preventative	06/14/2016	12/31/9999
Matthew Hayes	TPRO01	DC-PROC - INTRODUCTION TO PROCEDURES	Yes	Met	Work Preventative	06/14/2016	12/31/9999
Matthew Hayes	TPRO02	DC-PROC - TRAINING AND QUAL REQUIREMENTS	Yes	Met	Work Preventative	06/14/2016	12/31/9999
Matthew Hayes	TPROC	DC-PROC. SPONSOR/PREPARER QUAL SIG	Yes	Met	Work Preventative	06/14/2016	12/31/9999
Matthew Hayes	REC-MGMT	DC-RECORDS & INFO MANAGEMENT COMPLIANCE	Yes	Met	Administrative	---	12/31/9999

Matthew Hayes		CORP-9947WBT	DCPP - RIM	Yes	Met	Administrative	07/05/2023	12/31/9999
Matthew Hayes		RCAPPRQ	DC-ROOT CAUSE APPROVER	Yes	Met	Work Preventative	- - -	12/31/9999
Matthew Hayes		LSATITACE	DC-APPARENT CAUSE EVALUATIONS	Yes	Met	Work Preventative	04/02/2018	12/31/9999
Matthew Hayes		RCAPPRQ	DC-ROOT CAUSE APPROVER	Yes	Met	Work Preventative	06/07/2018	12/31/9999
Matthew Hayes		INFOSECURITY	INFORMATION SECURITY & PRIVACY AWARENESS	Yes	Met	Administrative	- - -	12/31/9999
Matthew Hayes		ISEC-9023WBT	2023 Security & Privacy Awareness(45Min)	Yes	Met	Administrative	03/28/2023	12/31/9999
Matthew Hayes		LEAN-OP	PG&E Lean Operating System	Yes	Met	Administrative	- - -	12/31/9999
Matthew Hayes		CORE-9032WBT	Intro to Lean Operating System (60Min)	Yes	Met	Administrative	07/01/2021	12/31/9999
Matthew Hayes		CORE-9031VL	Lean 4-Basic Plays Workshop	Yes	Met	Administrative	03/28/2023	12/31/9999

## **Attachment**

GOV-6102P-05\_Rev 0\_Redacted.pdf

## Power Generation Cause Evaluation Procedure

### SUMMARY

This utility procedure describes the Enterprise Cause Evaluation process for the Power Generation line of business at Pacific Gas and Electric Company (PG&E).

This procedure also establishes the requirements of the Cause Evaluation (CE) process and identifies the steps required to perform various forms of cause evaluation. Correctly performed cause evaluation is an essential function within PG&E's Corrective Action Program (CAP) and compliance with this procedure will ensure proper reporting.

Cause evaluation is a structured process used to determine, document and communicate the cause or reason why an incident, issue or failure occurred. CEs are necessary to identify the cause of the incident, issue or failure, to prevent or reduce the severity or probability of recurrence and to apply continuous improvement.

Level of Use: Informational Use

### TARGET AUDIENCE

This procedure applies to all Power Generation employees and their contractors who are required to participate in a formal cause evaluation for incidents, issues, or failures with the Power Generation line of business.

### SAFETY

Adherence to this procedure demonstrates Power Generation's commitment to PG&E's goal for improving employee, contractor, and public safety.

### BEFORE YOU START

- 1.1 COMPARE the publication date and version number on your working copy of the document against the published version in the Guidance Document Library to verify that it is current.
- 1.2 BE FAMILIAR WITH (and REVIEW as needed) [GOV-6102S, "Enterprise Causal Evaluation Standard."](#)
- 1.3 BE AWARE OF (and REVIEW as needed) the following documents:
  - [SAFE-1004S, "Serious Safety Incident Investigation Standard."](#)
  - [GOV-6101S, "Enterprise Corrective Action Program Standard."](#)
- 1.4 Definitions for the Cause Evaluation process or the Corrective Action Program can be found in the definitions section of [GOV-6101S, "Enterprise Corrective Action Program Standard."](#)
- 1.5 Roles and responsibilities for the Cause Evaluation process or the Corrective Action Program can be found in section 2 (Roles and Responsibilities) of [GOV-6101S, "Enterprise Corrective Action Program Standard."](#)

## Power Generation Cause Evaluation Procedure

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### PROCEDURE STEPS

#### NOTE

On high severity issues, an extent of condition should be performed and the appropriate immediate corrective actions to prevent recurrence should be implemented before performing the cause evaluation.

#### 1 Cause Evaluations (CEs)

1.1 Cause evaluations are categorized as Root Cause Evaluations (RCE), Apparent Cause Evaluations (ACE) or Work Group Evaluations (WGE).

1. For issues processed through the Power Generation Corrective Action Program the CAP Issue Review Team (CRT) will recommend the type of cause evaluation to be performed.

1.2 Root Cause Evaluation (RCE)

1. A root cause evaluation is a formal and rigorous investigation that uses industry-accepted analysis methods to determine the root cause(s) of a problem. The RCE identifies required corrective actions that prevent, or reduce the likelihood of a recurrence of the problem for the same or similar root cause(s).

2. A root cause evaluation is a significant commitment of time and resources and will be used for all high severity incidents, and may be used for less significant incidents where the commitment of time and resources can be justified to prevent recurrence.

## Power Generation Cause Evaluation Procedure

### 1.2 (continued)

3. A root cause evaluation will be performed by a qualified cause evaluator, as determined by PG&E's Cause Evaluation (CE) training program in accordance with [GOV-6102S, "Enterprise Causal Evaluation Standard."](#)
4. A root cause evaluation will be approved by the Power Generation Corrective Action Review Board (CARB).

### 1.3 Apparent Cause Evaluation (ACE)

1. An apparent cause evaluation is an evaluation based on readily available information that provides reasonable assurance that the cause of a problem is determined and will be corrected.
2. USE an apparent cause evaluation when management determines a formal but less rigorous cause determination is necessary.

### 1.4 Work Group Evaluation (WGE)

1. A work group evaluation is an evaluation based on the work group's experience, knowledge, and understanding of the associated risks and their ability to determine that the cause of a problem is identified and will be corrected or improved.
2. USE a work group evaluation when management determines an informal cause determination process will reduce the risk and likelihood of recurrence.

## 2 Applicability of Cause Evaluations

### 2.1 PERFORM a Root Cause Evaluation (RCE) when directed by:

1. The requirements of [Utility Standard SAFE-1004S, "Serious Safety Incident Investigation Standard."](#)
2. The requirements of [Utility Standard GOV-6101S, "Enterprise Corrective Action Program Standard."](#)
3. A Power Generation Senior Director and:
  - a. Agreed to by the Power Generation CAP Manager.

### 2.2 PERFORM an Apparent Cause Evaluation (ACE) when directed by:

1. The requirements of [Utility Standard GOV-6101S, "Enterprise Corrective Action Program Standard."](#)
2. A Power Generation Manager or above.

## Power Generation Cause Evaluation Procedure

2.2 (continued)

### NOTE

When the ACE will be performed and prepared by a qualified cause evaluator from the Power Generation CAP Team, concurrence will be required from the Power Generation CAP Manager and the ACE will be approved by the CARB.

2.3 PERFORM a Work Group Evaluation (WGE) when directed by:

1. The requirements of [Utility Standard GOV-6101S, "Enterprise Corrective Action Program Standard."](#)
2. A Power Generation Supervisor or above.

### 3 Root Cause Evaluation (RCE)

3.1 PROCESS root cause evaluations per the recommended Root Cause Evaluation Process Timeline in Appendix A, Root Cause Evaluation Process Timeline.

3.2 COMMUNICATE root cause evaluation status AND current factual information per the timeline in the Root Cause Evaluation Communication Schedule in Appendix B, Root Cause Evaluation Communication Schedule.

3.3 DOCUMENT root cause evaluation findings and recommendations on the approved Root Cause Report Template found on the Power Generation CAP web page.

3.4 Overview (issue identification, notification of Power Generation leadership)

1. ASSIGN RCE Sponsor:
  - a. Power Generation Senior Director or above for fatality
  - b. Director for less serious issues
  - c. The sponsor is responsible for assigning a RCE Lead and ensuring the RCE Team is staffed appropriately, verifying the corrective actions are assigned and completed, overseeing the effectiveness review, and approving all RCE documents.
  - d. The sponsor has ultimate responsibility for the final outcome of all mitigation activities including cause analysis, corrective actions, deliverables and any recommendations from the Law Department review.
2. Members of the RCE team are responsible to document issues requiring cause evaluation in the Power Generation system of record.

## Power Generation Cause Evaluation Procedure

### 3.5 ASSEMBLE RCE Team.

1. Primary RCE Team Members and requirements:
  - a. All team members must be trained on the fundamentals of cause evaluations.
  - b. Team lead:
    - Director for Serious Safety Incidents (SSIs)
    - Manager for other incidents
    - The lead is assigned by the RCE sponsor and is responsible for validating the initial significance level assessment, communicating the plan, establishing the scope of the evaluation, assembling the RCE Team, and ensuring the standard process timeline and communication protocol is followed.
  - c. Cause Evaluation Specialist:
    - Must be qualified to perform RCEs as determined by PG&E's CE training program in accordance with [GOV-6102S, "Enterprise Causal Evaluation Standard."](#)
    - Is responsible to ensure adherence to the requirements of this procedure and [Utility Standard, GOV-6102S, "Enterprise Causal Evaluation Standard"](#), when performing RCEs.
2. Support RCE Team Members and requirements.
  - a. All support team members must receive the appropriate ad-hoc web-based training within 3 days of joining the team.
  - b. Subject Matter Expert(s) (SMEs)
  - c. Legal Consultation
  - d. Safety Representative for safety issues
  - e. Optional members include representatives from: Regulatory Compliance, Learning Services, PG&E Academy, Emergency Preparedness, Corporate Security, Applied Technology Services (ATS), or other line of business (LOB), where appropriate.

## Power Generation Cause Evaluation Procedure

### 3.6 DEFINE the Problem AND Methodologies.

1. DEVELOP a charter to document:
  - a. The problem statement: DESCRIBE the unwanted, unacceptable or undesired condition (event).
  - b. DEFINE the investigation scope, organizational boundaries, timelines, AND key milestones of the investigation.
  - c. DETERMINE the investigative methodology or methodologies to be used. SEE Table 1, PG&E Preferred RCE Methodologies below.

**Table 1. PG&E Preferred RCE Methodologies**

<b>PG&amp;E Preferred Methodologies</b>	<b>Methodology Description</b>
Comparative Time Line	Provides a tabular, chronological presentation of evidence and other event-related information.
Hazard Barrier	Identifies what is encouraging people to behave in specified desired manners.
Fault Tree (Cause & Effect)	Provides a failure analysis of the undesired state of a system being analyzed using a system of logical thought to combine a series of lower-level events.
Factor Tree	An organization chart representing the chains of factors affecting a particular consequence. The tree starts with the consequence and continues through the direct factors and intermediate factors down to the deepest identifiable underlying factor.
Modified Management Oversight and Risk Tree (MORT)	A comprehensive analytical process that provides a method for structuring an investigation, determining the causal factors and root cause(s) of an incident.
Human Factored Analysis & Classification System (HFACS)	A method designed to identify factors that influence task performance. Not intended as a standalone tool but included with another method for human factor related events.

### 3.7 PERFORM Cause Evaluation.

1. RCE team DETERMINES root AND contributing cause(s).
  - a. USE the preferred methodology, from Table 1 above, based on issue type.
2. DOCUMENT the findings and cause(s) in the Power Generation system of record.

## Power Generation Cause Evaluation Procedure

- 3.8 PREPARE the Report.
  1. SUMMARIZE the findings AND assumptions related to the investigation.
  2. DETERMINE corrective actions.
  3. REFER to the approved Root Cause Report Template found on the Power Generation CAP web page.
- 3.9 APPROVE the Report.
  1. The Corrective Action Review Board (CARB) REVIEWS the final RCE Report Including:
    - a. The findings.
    - b. The causes.
    - c. The correction actions.
  2. The RCE Sponsor APPROVES the final RCE Report.
- 3.10 ASSIGN Corrective Actions (track/monitor the status of actions).
  1. DOCUMENT and TRACK Corrective Actions in the Power Generation system of record.
  2. ASSIGN actions to manager level employees.
  3. NEGOTIATE due dates that are reasonable and achievable with the implementing organization.
  4. MONITOR action status.
- 3.11 COMMUNICATE Cause Evaluation Results.
  1. REFER to Appendix B, Root Cause Evaluation Communication Schedule, for RCE communication schedule.
  2. Once the RCE findings, cause(s) and corrective actions have been approved, ATTACH the RCE final report to the Issue or Event created to support the RCE in the Power Generation system of record.
- 3.12 ESTABLISH Effectiveness Review Plan.
  1. DEVELOP a plan during the RCE process to verify achieving the intended or expected results after the implementation of corrective actions.
    - a. ESTABLISH methods to verify actions met the desired outcome.

## Power Generation Cause Evaluation Procedure

### 3.12.1 (continued)

- b. ESTABLISH attributes for monitoring and evaluation.
- c. ESTABLISH success criteria.
- d. DETERMINE the time frame to perform the review (typically no more than 6 months after the completion of the last corrective action).
- e. DOCUMENT and TRACK effectiveness reviews in the Power Generation system of record.

## 4 Apparent Cause Evaluation (ACE)

4.1 The correct use of an Apparent Cause Evaluation (ACE) when completing cause evaluation provides assurance that the cause of a problem, failure or event will be accurately determined and the appropriate corrective actions identified. This simplified form of cause analysis enables Power Generation personnel to complete a CE with readily available facts, and a minimum of supplemental data, evaluation techniques and time.

1. An apparent cause explains why a problem occurred. ACE uses the evaluator's judgment and experience to provide a logical account of the facts that identify the likely cause(s), that when corrected, should minimize recurrence.
2. While the ACE process is streamlined as compared to the more rigorous RCE process, key elements (outlined in [Sections 4.4 – 4.9](#) below) must be included for the evaluation to be considered complete.

4.2 The use of an ACE differs from a more thorough RCE in the following ways:

1. ACE is used for incidents expected to occur, and when the consequences of problem recurrence, while not wanted, are acceptable by design. An example would be normal wicket gate shear pin breakage or a unit relay from a lightning or bird strike.
2. ACE may also be used for incidents that are random in nature, and would not reasonably be expected to occur again. An example is a plane crashing into a canal.
3. ACE is appropriate for incidents with consequences not related to adverse trends. Examples would be random equipment malfunction, a shaft seal packing failure, and the operation of a field ground relay.
4. ACE is appropriate for minor human performance events that do not result in injury, or damage to property, equipment or the environment.

## Power Generation Cause Evaluation Procedure

### 4.3 DOCUMENT ACE findings AND recommendations.

1. The ACE may be documented on the approved Apparent Cause Report Template found on the Power Generation CAP web page or may be documented directly into the Power Generation system of record.

#### NOTE

When the ACE will be performed and prepared by a qualified cause evaluator from the Power Generation CAP Team the report is documented on the approved ACE Report Template and is approved by the CARB.

### 4.4 ASSIGN ACE Lead:

1. The ACE Lead should be an individual who is familiar with the issue, can perform the investigation, and can analyze the results to determine cause(s) and corrective action(s).
2. The ACE Lead is responsible for documenting issues requiring cause evaluation in the Power Generation system of record.
3. The ACE lead does not require any formal qualification to perform the required duties.

### 4.5 DEFINE the Problem and Methodologies:

1. The problem statement should identify the standard and the deviation from the standard that occurred.

### 4.6 PERFORM Cause Evaluation (DETERMINE apparent cause AND contributing cause[s]).

1. USE the preferred methodology, from [Table 1](#) on Page 6, based on issue type.
2. The analysis / evaluation must include:
  - a. A detailed description of the incident and statement of all the known relevant facts.

## Power Generation Cause Evaluation Procedure

### 4.6.2 (continued)

- b. Identification of information or assumptions that are unknown or missing. This is required for the incident to be completely explained. Available records should be considered such as:
- Event logs.
  - Procedures and work packages.
  - Test plans & Inspection reports.
  - Vendor manuals, Drawings and specifications.
  - Equipment history records.
  - Chart recordings.
  - Plant operator readings.
  - Design standard information.
  - Photographs of failure site.
  - Industry bulletins.
  - Operating experience.
- c. Interviews of personnel involved. The evaluator must INTERVIEW personnel involved in the incident as soon as practical.
- (1) IF more than one person is involved in the event, the interviews should be conducted individually.
  - (2) FOCUS on what happened, how it happened, why it happened, and what should be done to correct the problem, not to find fault or blame.
- d. WHEN all the incident facts are understood, DETERMINE the apparent cause of the event.
- (1) The apparent cause will be a logical outcome of the description of the incident. Frequently, apparent causes are determined by repeatedly asking and answering "WHY?" about the actions and occurrences that directly resulted in the incident, beginning with the undesirable consequence.

## Power Generation Cause Evaluation Procedure

### 4.6.2 (continued)

- e. To validate the apparent cause(s), ASK:
- Would elimination of this cause effectively minimize the potential that this event could happen again?
  - Are the apparent cause(s) supported by the facts?
  - Is it reasonable to conclude that the problem would not have occurred if the apparent cause(s) were not present?

### 4.7 PREPARE the Report.

1. DETERMINE apparent AND contributing cause(s).
2. DETERMINE corrective actions.
3. The findings, cause(s) and corrective actions must be approved by the Power Generation Manager or above responsible for the ACE that was performed.
4. DOCUMENT the findings AND cause(s) in the Power Generation system of record.
5. Once the ACE findings, cause(s) and corrective actions have been approved, ATTACH the final report, when developed, to the Issue or Event created to support the evaluation in the Power Generation system of record.

### 4.8 ASSIGN Corrective Actions (track/monitor action status).

1. DOCUMENT and TRACK corrective actions in the Power Generation system of record.
2. ASSIGN actions to manager or supervisor level employees.
3. NEGOTIATE due dates that are reasonable and achievable with the implementing organization.
4. MONITOR corrective action status.

## Power Generation Cause Evaluation Procedure

### 4.9 ESTABLISH Effectiveness Review Plan, when determined by the ACE Lead.

#### NOTE

Although the performance of an ACE does not require an effectiveness review there are times when the issue and corrective action(s) dictate that the review will provide value and assurance that the actions were adequate to minimize recurrence or severity.

1. DEVELOP a plan during the ACE process to verify achieving the intended or expected results after the implementation of corrective actions.
  - a. ESTABLISH methods to verify actions met the desired outcome.
  - b. ESTABLISH attributes for monitoring and evaluation.
  - c. ESTABLISH success criteria.
  - d. DETERMINE the time frame to perform the review (typically no more than 6 months after the completion of the last corrective action).
  - e. DOCUMENT and TRACK effectiveness reviews in the Power Generation system of record.

## 5 Work Group Evaluation (WGE)

5.1 The use of a Work Group Evaluation (WGE) when analyzing a problem provides a method to accurately determine the cause of a problem, failure or event and identify the appropriate corrective actions. This simplified form of cause analysis enables Power Generation personnel to complete an evaluation within their own work group without formal documentation or cause evaluation expertise.

1. A cause explains why a problem occurred. WGE uses the work group's judgment and experience to provide a logical account of the facts that identify the likely cause(s), that when corrected, should minimize recurrence.
2. While the WGE is an informal process, key elements (outlined in Sections 5.3 -5.4 below) must be included for the evaluation to be considered complete.

5.2 Work group evaluation findings and recommendations are not formally documented in a report.

### 5.3 ASSIGN WGE Lead:

1. The WGE Lead should be an individual who is familiar with the issue, can lead the discussion, and facilitate the work group to determine cause(s) and corrective action(s).

## Power Generation Cause Evaluation Procedure

### 5.3 (continued)

2. The WGE Lead is responsible for documenting issues requiring evaluation in the Power Generation system of record.

### 5.4 PERFORM Cause Evaluation.

1. DETERMINE cause(s).
2. DETERMINE corrective actions.
3. ASSIGN corrective actions.
4. DOCUMENT and TRACK findings, cause(s), corrective actions in the Power Generation system of record.

### END of Instructions

### DEFINITIONS

NA

### IMPLEMENTATION RESPONSIBILITIES

The Power Generation Operations Senior Director is responsible for approving, revising, and distributing this procedure.

The Power Generation CAP Manager is responsible for developing this procedure in alignment with the Enterprise Causal Evaluation Standard, identifying their employees to support implementation and sustaining this procedure.

The Power Generation managers are responsible for ensuring that their employees are aware of and comply with the requirements of this procedure.

Employee(s) identified and held accountable by the organization for fulfilling specific responsibilities may delegate their responsibilities to others; however, the individual(s) identified is accountable for the result.

### GOVERNING DOCUMENT

[Utility Standard GOV-6102S, "Enterprise Causal Evaluation Standard"](#)

### COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

Kern OII Settlement Agreement

## Power Generation Cause Evaluation Procedure

### REFERENCE DOCUMENTS

**Developmental References:**

- [Utility Standard SAFE-1004S, "Serious Incident Investigation Standard"](#)
- [Utility Standard GOV-6101S, "Enterprise Corrective Action Program Standard"](#)

**Supplemental References:**

NA

### APPENDICES

- Appendix A, Root Cause Evaluation Process Timeline
- Appendix B, Root Cause Evaluation Communication Schedule

### ATTACHMENTS

NA

### DOCUMENT REVISION

NA

### DOCUMENT APPROVER

████████████████████ – Power Generation Operations

### DOCUMENT OWNER

████████████████████ - Power Generation Technical Services

### DOCUMENT CONTACT

████████████████████ - Power Generation Corrective Action Program

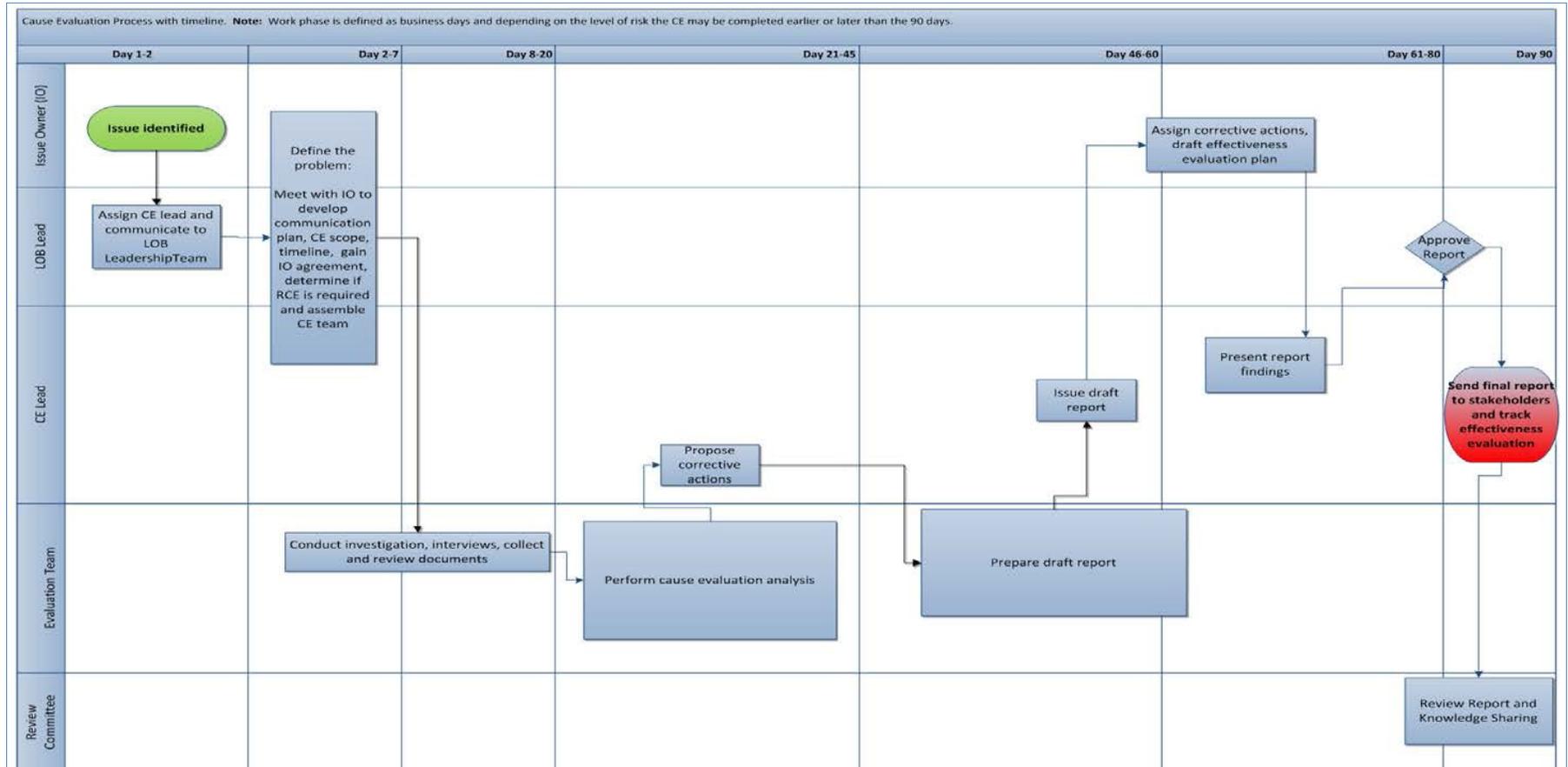
### REVISION NOTES

Where?	What Changed?
NA	New procedure

# Power Generation Cause Evaluation Procedure

## Appendix A, Root Cause Evaluation Process Timeline

Page 1 of 1



## Power Generation Cause Evaluation Procedure

### Appendix B, Root Cause Evaluation Communication Schedule

Page 1 of 1

Communication	Type	Purpose	Accountable Author(s)	Timeframe	Target Audience
<b>Preliminary Internal Notification (Limited)</b>	Email	A communication sent to a limited group of PG&E personnel that need to respond immediately following an incident. This notification is under Attorney-client privilege. At minimum, the notification contains the following information: <ul style="list-style-type: none"> <li>• Brief Description of Incident</li> <li>• Status of Injured Employee(s)</li> <li>• Medical Center Information</li> <li>• Individuals and/or Organizations that have been notified of the incident</li> <li>• Actions Taken by PG&amp;E</li> </ul>	Issue Owner	Within 48 Hours of Incident	<ul style="list-style-type: none"> <li>• Power Generation Leadership</li> <li>• Safety Department Leadership</li> <li>• Law Department</li> <li>• Workforce Health and Productivity</li> <li>• Employee Assistance Program</li> <li>• Manager of Injured Employee</li> <li>• Labor Relations (as needed)</li> <li>• Emergency Management (as needed)</li> </ul>
<b>Interim Report (Limited)</b>	Electronic Document	An organized, detailed compilation of the CE team's work. This report serves as the central document tracking all team actions performed to ensure that a quality Cause Evaluation was completed. This document is under Attorney-client privilege. At minimum, the report contains the following information: <ul style="list-style-type: none"> <li>• Executive Summary/Introduction</li> <li>• History/Background</li> <li>• Incident Time line and Description of Incident</li> <li>• Root Cause</li> <li>• Corrective Actions</li> <li>• Lessons Learned</li> <li>• Details of Information Gathered for Analysis</li> </ul>	CE Lead	Within 60 Days of Incident	<ul style="list-style-type: none"> <li>• Power Generation Leadership</li> <li>• Safety Department</li> <li>• Law Department</li> <li>• CE Review Committee</li> </ul>
<b>Presentation of Findings &amp; Corrective Actions</b>	Presentation	Summary of the Final Internal (Limited) Report that is presented to the Power Generation Corrective Action Review Board for verification of the CE team's findings, corrective actions and lessons learned. At minimum, the summary contains the following information: <ul style="list-style-type: none"> <li>• Brief Description of Incident</li> <li>• Cause Analysis</li> <li>• Corrective Actions</li> <li>• Lessons Learned</li> <li>• Effectiveness Review Plan</li> </ul>	CE Lead	Within 90 Days of Incident	<ul style="list-style-type: none"> <li>• Power Generation Leadership</li> <li>• Safety Department</li> <li>• Law Department</li> <li>• Corrective Action Review Board</li> </ul>

## **Attachment**

SAFE-1004S+Att.10\_SIF Rev 0.pdf

**Attachment 10 Rev 0, Serious Incident Response and  
Investigation Communication Protocol Page 1 of 2**

Communication	Type	Purpose	Accountable Author(s)	Timeframe	Target Audience
Notification of incident to Emergency Services (911)	Call	Receive assistance from Emergency Services.  At a minimum, the notification contains the following information: <ul style="list-style-type: none"> <li>Brief description of incident</li> <li>Status of injured person(s)</li> </ul>	<ul style="list-style-type: none"> <li>Impacted Employee or Employee with Impacted Employee</li> </ul>	Immediately after incident	<ul style="list-style-type: none"> <li>Emergency Services</li> </ul>
Notification of incident to Supervisor	Call	Notify Supervisor of incident.  At a minimum, the notification contains the following information: <ul style="list-style-type: none"> <li>Brief description of the incident</li> <li>Status of injured person(s)</li> <li>Medical Center name/location/phone number</li> <li>Individuals and/or organization that have been notified of the incident</li> <li>Action taken by PG&amp;E</li> </ul>	<ul style="list-style-type: none"> <li>Impacted Employee or Employee with Impacted Employee</li> </ul>	Immediately after incident	<ul style="list-style-type: none"> <li>Caller's Supervisor</li> </ul>
Notification of incident to Safety and Health Report Line (415-973-8700)	Call	Notify Safety and Health of incident.  At a minimum, the notification contains the following information: <ul style="list-style-type: none"> <li>Brief description of the incident</li> <li>Status of injured person(s)</li> <li>Medical Center name/location/phone number</li> <li>Individuals and/or organization that have been notified of the incident</li> <li>Action taken by PG&amp;E</li> </ul>	<ul style="list-style-type: none"> <li>Impacted Employee, or</li> <li>Employee with Impacted Employee, or</li> <li>Supervisor</li> </ul>	Immediately after incident	<ul style="list-style-type: none"> <li>Safety and Health Report Line Representative</li> </ul>
Preliminary Internal Notification via Safety and Health Report Line	Email	Notify a limited group of PG&E personnel that need to respond immediately following an incident. This notification is under Attorney-client privilege.  At a minimum, the notification contains the following information: <ul style="list-style-type: none"> <li>Brief description of incident</li> <li>Status of injured person(s)</li> <li>Medical Center name/location/phone number</li> <li>Individuals and/or organizations that have been notified of the incident</li> <li>Actions taken by PG&amp;E</li> </ul>	<ul style="list-style-type: none"> <li>Safety Report Line Representative</li> </ul>	Immediately after the incident	<ul style="list-style-type: none"> <li>Safety and Health Senior Management</li> <li>Safety and Health Senior Management direct reports</li> <li>Safety and Health ELT</li> <li>Safety Business Partners (All)</li> <li>Safety Specialists (All)</li> <li>Safety Investigation Team (All)</li> <li>Labor Representatives Leadership</li> <li>Sr. Director, Labor Relations</li> <li>Sr. Director, Law</li> <li>Corporate Relations Senior Management</li> <li>Corporate Relations Safety Lead</li> <li>Supervisor/Manager/Director/VP of injured person/ LOB Safety Lead</li> </ul>
Notification of incident to Nurse Report Line	Call	Notify Nurse Report Line representatives in order to start worker's comp process	<ul style="list-style-type: none"> <li>Safety Report Line Representative</li> </ul>	Within 24 hours of incident	<ul style="list-style-type: none"> <li>Nurse Report Line Representative</li> </ul>
Notification of incident to Senior Officer team	Email	Notify Senior Officer team of incident.	<ul style="list-style-type: none"> <li>Safety and Health Senior Management</li> </ul>	Within 2 hours of incident	<ul style="list-style-type: none"> <li>Senior Officer Team</li> </ul>
Notification to assigned Safety	Email	Notify LOB Safety Lead and Safety and Health Safety Lead of their assignment	<ul style="list-style-type: none"> <li>LOB Senior Management</li> <li>Safety and Health Senior Management</li> </ul>	Within 4 hours of	<ul style="list-style-type: none"> <li>LOB Safety Lead</li> <li>Safety and Health Safety Lead</li> </ul>

**Attachment 10, Serious Incident Response and Investigation  
Communication Protocol Page 2 of 2**

<b>Incident Leads</b>				incident	
<b>Preliminary Internal All-Employee Communication</b>	Email	<p>Communicate the initial facts of the incident to PG&amp;E employees.</p> <p>At minimum, the summary contains the following information:</p> <ul style="list-style-type: none"> <li>Brief Description of Incident</li> <li>Development of Serious Incident Investigation Team</li> <li>Actions Taken by PG&amp;E</li> </ul>	<ul style="list-style-type: none"> <li>Safety and Health Senior Management</li> </ul> <p>Reviewers: Communications Senior Management, General Counsel Senior Management, Affected LOB Senior Management</p>	Within 24 hours of incident	<ul style="list-style-type: none"> <li>All PG&amp;E Employees</li> </ul>
<b>Preliminary Board of Directors Communication</b>	Email	<p>Communicate the initial facts of the incident to PG&amp;E Board of Directors.</p> <p>At minimum, the summary contains the following information:</p> <ul style="list-style-type: none"> <li>Brief Description of Incident</li> <li>Development of Serious Incident Investigation Team</li> <li>Actions Taken by PG&amp;E</li> </ul>	<ul style="list-style-type: none"> <li>President and COO</li> </ul> <p>Reviewers: Communications Senior Management, General Counsel Senior Management, Safety and Health Senior Management, Affected LOB Senior Management, Corporate Secretary</p>	Within 24 hours of incident	<ul style="list-style-type: none"> <li>PG&amp;E Board of Directors</li> </ul>
<b>Final Report</b>	Email	<p>An organized, detailed compilation of the serious incident investigation team's work. This report serves as the central document tracking all team actions performed to ensure that a quality incident analysis was completed.</p> <p>At minimum, the report contains the following information:</p> <ul style="list-style-type: none"> <li>Executive Summary/Introduction</li> <li>History/Background</li> <li>Incident Timeline</li> <li>Detailed Description of Incident</li> <li>Findings</li> <li>Recommendations</li> <li>Corrective Actions</li> <li>Lessons Learned</li> </ul>	<ul style="list-style-type: none"> <li>LOB Senior Management</li> </ul> <p>Reviewers: Safety and Health Senior Management, Affected LOB Senior Management, Law Director</p>	Within 30-45 days of incident	<ul style="list-style-type: none"> <li>Safety and Health Senior Management</li> <li>LOB Executive Leadership</li> </ul>
<b>Presentation of Findings &amp; Corrective Actions</b>	Presentation	<p>Summary of the Final Internal Report is presented by the LOB CE Lead to the LOB Corrective Actions Review Board and Senior Leadership for verification of the incident investigation team's findings, corrective actions and lessons learned.</p> <p>At minimum, the summary contains the following information:</p> <ul style="list-style-type: none"> <li>Brief Description of Incident</li> <li>Causal Evaluation</li> <li>Corrective Actions</li> <li>Lessons Learned</li> <li>Effectiveness Review Plan</li> </ul>	<ul style="list-style-type: none"> <li>LOB Senior Management</li> </ul> <p>Reviewers: Safety and Health Director, Communications Director, Law Director</p>	Within 45-60 days of incident	<ul style="list-style-type: none"> <li>Senior Officer Team via Safety Committee</li> <li>Corrective Action Review Board</li> </ul>
<b>Final Internal/External Communication</b>	Email	<p>A closing summary that communicates the serious incident investigation team's findings, corrective actions, and lessons learned to PG&amp;E employees.</p> <p>At minimum, the communication contains the following information:</p> <ul style="list-style-type: none"> <li>Brief Description of Incident</li> <li>Causal Evaluation</li> <li>Corrective Actions</li> <li>Lessons Learned</li> </ul>	<ul style="list-style-type: none"> <li>LOB Senior Management</li> <li>Safety and Health Senior Management</li> </ul> <p>Reviewers: Communications Senior Management, General Counsel Senior Management, Affected LOB Senior Management, Safety and Health Senior Management</p>	Within 45-60 days of incident	<ul style="list-style-type: none"> <li>All PG&amp;E Employees</li> <li>Contractor Workforce</li> </ul>

## **Attachment**

GOV-6102S Rev 06\_Redacted.pdf

# Enterprise Cause Evaluation Standard

## SUMMARY

This standard describes the requirements, roles, and responsibilities covering the Cause Evaluation (CE) process. It applies to the cause evaluations documented in the Corrective Action Program and conducted by PG&E Corporation (Corporation) and its controlled subsidiaries, including Pacific Gas and Electric Company (Utility) (together, PG&E), except for nuclear power generation organization documents. Nuclear Regulatory Commission license requirements apply to nuclear power generation documents.

This standard also governs, in part, other documents that provide instruction about work, such as manuals and job aids.

The purpose of PG&E’s Cause Evaluation process is to produce cause evaluations on work related safety, compliance, quality, and equipment performance issues that do the following:

- Promptly identify causes of performance gaps
- Reduce opportunity for recurrence of serious safety incident
- Improve performance and safety outcomes through the implementation of corrective actions.

The Kern Oil settlement of July 2015 requires PG&E implement a Cause Evaluation program and perform Root Cause Evaluations (RCE). Definitions and procedural guidance pertaining to SSI can be found in [“SAFE-1004S Safety Incident Notification and Response Management Standard”](#).

## TARGET AUDIENCE

This standard applies to PG&E employees and non-employee coworkers involved in writing, reviewing, approving, or managing PG&E cause evaluations and the other documents covered by this standard.

## TABLE OF CONTENTS

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## Enterprise Cause Evaluation Standard

### REQUIREMENTS

#### 1 Objective

- 1.1 The objective of this standard is to establish a framework governing the timing, delivery, and documentation of Cause Evaluations (CEs) relating to work related safety, compliance, quality, and performance issues, to prevent or minimize the probability of recurrence, and to apply continuous improvement measures.

#### Note

The CPUC (California Public Utilities Commission) or its SED (Safety and Enforcement Division) may direct PG&E to undertake any level of CE for any incident.

#### 2 Applicability

- 2.1 This standard is applicable to all cause evaluations including Work Group Evaluations (WGE), Common Cause Evaluations (CCE), Apparent Cause Evaluations (ACE), Root Cause Evaluations (RCE), and Effectiveness Reviews (EFFR).

#### 3 Process Overview

- 3.1 The CE process enables the evaluation and resolution of issues entered in the CAP by ensuring a structured process is used to determine, document, and communicate the cause(s) and corrective action(s) for an incident, issue, or error.
- 3.2 Refer to GOV-6102P-06 "[Cause Evaluation Procedure](#)" and GOV-6102M "[Cause Evaluation Manual](#)" for guidance completing each type of cause evaluation.
- CEs use various analysis methods and tools (i.e., Human Factors Analysis and Classification System, Barrier Analysis, Comparative Timeline, Factor Tree Analysis, Simple Problem Solving) to identify the underlying causes that led to an incident.
  - Utilization of the analysis methods and tools to be used is at management's discretion or at the direction of California Public Utilities Commission (CPUC) or CPUC's Safety and Enforcement Division's (SED) direction.
1. The CE type designated by the CAP Review Team (CRT) can be escalated to a more rigorous CE type should the Sponsor, Issue Owner or Corrective Action Review Board (CARB) determine that there is a need for additional rigor.
  2. The CE type designated by the CRT can be de-escalated to a less rigorous CE type with the approval of the issue Sponsor, CARB Chairperson and ECAP Director.

## Enterprise Cause Evaluation Standard

3. Instructions on the de-escalation of a SIF incident must follow instructions located in "[Attachment 1 Request to De-escalate a SIF Classification](#)," 1100P-01, "Serious Injury and Fatality (SIF) Procedure".

### 3.3 Work Group Evaluation (WGE)

1. The cause evaluation process can be used for WGEs assigned to address incidents and issues related to safety, quality, compliance, and performance issues as determined by the Functional Area (FA).
2. Evaluation completion timeframe is at the discretion of the Issue Owner and in accordance with GOV-6101P-08, "[Corrective Action Program Procedure](#)".

### 3.4 Common Cause Evaluation (CCE)

1. CCEs may be assigned to address same or similar incidents or conditions as determined by the FA.
2. The CCE process identifies corrective actions (CA) to address underlying elements for common failures by implementing changes and/or controls.
3. Must be completed per GOV-6102P-06 "[Cause Evaluation Procedure](#)".

### 3.5 Apparent Cause Evaluation (ACE)

1. Assigned per GOV-6101P-08 "[Corrective Action Program Procedure](#)" AND SAFE-1100S "[Serious Injury and Fatality \(SIF\) Standard](#)".
2. Identifies corrective actions (CA) to reduce the likelihood of an identified problem and resolve a finding or issue by implementing changes and/or controls.
3. Must be completed per GOV-6102P-06 "[Cause Evaluation Procedure](#)".

### 3.6 Root Cause Evaluation (RCE)

1. Assigned per GOV-6101P-08 [Corrective Action Program Procedure](#) AND SAFE-1100S [Serious Injury and Fatality \(SIF\) Standard](#):
2. Identifies Corrective Actions to Preclude Recurrence (CAPR) to prevent the problem from recurring because of a same or similar root cause/failure mechanism by implementing changes and/or controls.
3. Must be completed per GOV-6102P-06 "[Cause Evaluation Procedure](#)".

### 3.7 Effectiveness Review Evaluation (EFFR)

1. EFFRs verify the intended or expected results of CAPR and/or CA were achieved after implementation.

## Enterprise Cause Evaluation Standard

2. EFRs must be completed within the timeframe specified in the Effectiveness Review Plan.
3. EFRs must be reviewed and approved by FA CARB.

### 3.8 Training Requirements

1. Cause Evaluators performing RCE, ACE or CCE evaluations must meet the following training requirements:
  - a. CORP-6010WBT Introduction to Cause Evaluation
  - b. ECAP Cause Evaluation Team Member Roles and Responsibilities
    - (1) MUST be complete within 30 calendar days of being made available
  - c. Cause Evaluation Training - can be satisfied with any of the following:
    - CORP-6011, ECAP Cause Evaluation Training
    - Legacy Training (ECAP-01, ECAP-02, & ECAP-03)
    - Cause Evaluation Preparer Qualification (CEPREPQ)
  - d. ECAP CE Qualification OJT
    - (1) MUST be complete within one year of being made available
2. Cause Evaluation Team Leads are required to complete:
  - a. CORP-6010WBT, Introduction to Cause Evaluation
  - b. CORP-6013WBT, Cause Evaluation for Leaders
  - c. ECAP Cause Evaluation Team Members Roles and Responsibilities Training
    - (1) MUST be complete within 30 calendar days of being made available
3. Cause Evaluation Sponsors are required to complete:
  - a. CORP-6010WBT, Introduction to Cause Evaluation
  - b. CORP-6013WBT, Cause Evaluation for Leaders
  - c. ECAP Cause Evaluation Team Members Roles and Responsibilities Training
    - (1) MUST be complete within 30 calendar days of being made available
4. CARB Members are required to complete:
  - a. CORP-6010WBT, Introduction to Cause Evaluation

## Enterprise Cause Evaluation Standard

- b. CORP-6013WBT, Cause Evaluation for Leaders
- c. ECAP CARB Member Yearly Training
5. The Enterprise Cause Evaluation Process Owner must maintain a list of qualified cause evaluator personnel and post it on the Enterprise Corrective Action Program (ECAP) website to reference.
6. Qualified Cause Evaluators are required to renew their qualification every two years by:
  - a. Attending annual Cause Evaluator Refresher training AND
  - b. Leading a cause evaluationOR
  - c. Passing a test demonstrating understanding of CE requirements, concepts, and use of analytical tools.
7. Failure to maintain Cause Evaluator Qualification will result in loss of qualification.

### 3.9 Communications

1. Evaluations for SIF issues must follow the communications protocols outlined in Enterprise Safety and Health communication protocol in accordance with
  - SAFE-1004S, "[Safety Incident and Response Management](#)".
  - SAFE-1100S, "[Serious Injury and Fatality \(SIF\) Standard](#)".

## 4 Roles and Responsibilities

### 4.1 Enterprise CE Process Owner

1. Serves as chair of the Cross Functional CE Review Committee (CFCERC) in accordance with Kern OII.
2. Oversees the development and execution of cause evaluation training.
3. Oversees the CE process data verifications as described in GOV-6102P-06 "[Cause Evaluation Procedure](#)".

### 4.2 Sponsor

1. Provides overall leadership to the cause evaluation or cause evaluation team.
2. Secures the necessary resources to investigate and resolve the problem being investigated.

## Enterprise Cause Evaluation Standard

3. Ensures the analysis proceeds in a timely manner.

### 4.3 Team Lead / Issue Owner

1. Conducts the cause evaluation in accordance with GOV-6102P-06 "[Cause Evaluation Procedure](#)".
2. Ensures the SIF Response Investigation Communication Protocol is adhered to per SAFE-1004S, "[Safety Incident Notification and Response Management Standard](#)".

### 4.4 CE Team

1. Responsible for conducting cause evaluations per GOV-6102P-06 "[Cause Evaluation Procedure](#)".

### 4.5 Cause Evaluator

1. Acts as Subject Matter Expert (SME) in the Cause Evaluation process.
2. Responsible for ensuring the CE process is followed per GOV-6102P-06, "[Enterprise Cause Evaluation Procedure](#)".

### 4.6 Corrective Action Review Board (CARB)

1. Provide oversight, review, and approval of all RCEs, ACEs, CCEs and, EFRs.
2. Approves the Charter and Problem Statement for all RCE's.
3. Responsible for ensuring the CE process is followed per GOV-6102P-06, "[Enterprise Cause Evaluation Procedure](#)".

### 4.7 Functional Area CAP Manager

1. Responsible to ensure implementation and compliance to the standard within their responsible FA.

## 5 Records

- 5.1 CAP issues and associated records must be retained per GOV-7101S "[Enterprise Records and Information Standard](#)".

### END of Requirements

## DEFINITIONS

**Cause:** A condition such as an action, error, omission, or trigger that produces an unwanted incident and explains why it occurred.

## Enterprise Cause Evaluation Standard

- **Root Cause:** The cause identified during a Root Cause Evaluation (RCE). If corrected, it would preclude the event from recurring.
- **Apparent Cause:** The cause identified during an Apparent Cause Evaluation (ACE). If corrected, it would reduce the likelihood of the event recurring.
- **Common Cause:** Common underlying elements among three or more different, unique, but similar events or issues. The underlying elements may be anything from a common failure mechanism to a common cause that may or may not require further investigations. A single cause or combination of causes that has been identified as causing or contributing to same or similar events.

**Cause Evaluation (CE):** A structured process used to determine, document, and communicate the cause or reason how and/or why an incident, issue or error occurred.

- **Work Group Evaluation (WGE):** A WGE uses the work group's judgment and experience to provide a logical account of the facts that identify the likely cause(s) that, when corrected, should minimize recurrence.
- **Common Cause Evaluation (CCE):** An analysis method used to identify common underlying elements among three or more different, unique, but similar events or issues. The underlying elements may be anything from a common failure mechanism to a common cause that may or may not require further investigations.
- **Apparent Cause Evaluation (ACE):** An evaluation based on data and information pertinent to the evaluation that provides reasonable assurance that the cause of a problem is determined and will be corrected.
- **Root Cause Evaluation (RCE):** A formal and rigorous investigation that uses industry-accepted analysis methods to determine the root cause(s) of a problem. The RCE identifies required corrective actions that prevent or reduce the likelihood of a recurrence of the problem for the same or similar root cause(s).

**Corrective Action Review Board (CARB):** A senior level management board in each FA that provides oversight for review of SIF Actual and SIF Potential RCE and ACE cause evaluations. Includes FA representatives from Regulatory Compliance & Quality Assurance, Safety, Asset Strategy, Operations, and CAP.

**Corrective Action:** (1) A solution meant to reduce or eliminate an identified problem, including any action taken to resolve a finding or issue by implementing changes or controls to preclude recurrence. (2) Restores an unacceptable or adverse condition to an acceptable condition or capability.

**Corrective Action to Preclude Recurrence (CAPR):** An action taken to preclude an issue from occurring again (or minimize its likelihood) because of the same failure mechanism.

**Effectiveness Review Evaluation:** A documented review to determine that the intended or expected results were achieved after implementation of corrective actions and confirm that new problems or unintended consequences were not introduced by implementation of the actions.

**Effectiveness Review Plan:** A plan created during the CE process to verify that the intended or expected results were achieved after implementation of corrective actions. The plan

## Enterprise Cause Evaluation Standard

includes the following: methods used to verify the actions met the desired outcome, attributes to be monitored and evaluated, success criteria, and expected timeline to perform the effectiveness review.

**Human Factors Analysis and Classification System (HFACS):** A human error framework designed to systematically examine underlying human causal factors and to improve accident investigations focused on four levels of failure: 1) Unsafe Acts, 2) Preconditions for Unsafe Acts, 3) Unsafe Supervision, and 4) Organizational Influences.

**Issue:** An unwanted or undesired condition adverse to safety, quality, or performance. This can also be an improvement opportunity.

**Incident:** An unplanned sequence of events that results in or could result in undesirable consequences related to safety, reliability, and affordability.

**Serious Injury or Fatality Actual (SIF Actual):** A work-related high-energy incident from work at or for PG&E resulting in any of the following to employees, contractors, or directly supervised contractors:

- A fatality – work related fatal injury or illness.
- A life-threatening injury or illness that required immediate life-preserving action that if not applied immediately would likely have resulted in the death of that person.
- A life-altering injury or illness that resulted in a permanent and significant loss of a major body part or organ function.

**Serious Injury or Fatality Potential (SIF Potential):** A high-energy incident in the absence of a direct control where a fatality or life-threatening or altering injury is not sustained.

**Subject Matter Expert (SME):** Individual with knowledge and experience in the functional area of work being investigated for the incident or issue.

### IMPLEMENTATION RESPONSIBILITIES

Each officer and director are responsible for implementing the Enterprise Cause Evaluation Standard within their organization. Directors, managers, and supervisors are responsible for communicating the standard to all employees and ensuring that their employees understand and properly implement the requirements of this standard.

Internal Audit (IA) conducts periodic reviews of the investigation process in accordance with the approved annual IA schedule.

### GOVERNING DOCUMENT

[GOV-03, Corrective Action Program Policy](#)

### COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

#### Records and Information Management:

PG&E records are company assets that must be managed with integrity to ensure authenticity and reliability. Each Line of Business (LOB) must manage Records and Information in accordance with the Enterprise Records and Information (ERIM) Policy, Standards and

## Enterprise Cause Evaluation Standard

Enterprise Records Retention Schedule (ERRS). Each Line of Business (LOB) is also responsible for ensuring records are complete, accurate, verifiable and can be retrieved upon request. Refer to [GOV-7101S, "Enterprise Records and Information Management Standard"](#) for further records management guidance or contact ERIM at [Enterprise\\_RIM@pge.com](mailto:Enterprise_RIM@pge.com)."

Kern OII Decision Approving Settlement Agreement, Decision 15-07-014 July 23, 2015

### REFERENCE DOCUMENTS

#### Developmental References:

NA

#### Supplemental References:

- GOV-6101S, "[Corrective Action Program Standard](#)"
- GOV-6101P-08, "[Corrective Action Program Procedure](#)"
- GOV-6102P-06, "[Enterprise Cause Evaluation Process Procedure](#)"
- GOV-6102M, "[Cause Evaluation Manual](#)"
- SAFE-1004S, "[Safety Incident Notification and Response Management Standard](#)"
- SAFE-1100S, "[Serious Injury and Fatality \(SIF\) Standard](#)"
- SAFE-1100M, "[SIF Response and Cause Evaluation Manual](#)"
- GOV-7101S, "[Enterprise Records and Information Management Standard](#)"
- Inter-Departmental Administrative Procedure (IDAP) OM7.ID3, "Root Cause Evaluation"
- Inter-Departmental Administrative Procedure (IDAP) OM7.ID4, "Cause Evaluations"

### APPENDICES

- Appendix A, Table 1: Cause Evaluation Team Training Requirements Matrix

### ATTACHMENTS

- Attachment 1, "[Corrective Action Review Board \(CARB\) Charter](#)"
- Attachment 2, "[Cause Evaluation Review Sheet](#)"

### DOCUMENT REVISION

GOV-6102S Rev. 5

### DOCUMENT APPROVER

 Director, Enterprise Corrective Action Program (Executive CAP Sponsor)

## Enterprise Cause Evaluation Standard

### DOCUMENT OWNER

[REDACTED], Enterprise Corrective Action Program, Cause Evaluations (CE Process Owner)

### DOCUMENT CONTACT

[REDACTED], Enterprise Corrective Action Program, Cause Evaluations (CE Process Owner)

### REVISION NOTES

Where?	What Changed?
3.2	Added Simple Problem Solving to list of CE analysis methods and tools.
3.3 – 3.6	Rearranged the listing of CE types to align with order presented in Procedure (WGE, CCE, ACE, RCE)
3.5	Removed SIF-P/Non-SIF differentiation creating a single ACE process
3.6	Removed SIF-P/Non-SIF differentiation creating a single RCE process
3.3 – 3.6	Moved timelines to Procedure
3.8.1	Added CORP-6010, CE Roles and Responsibilities and Yearly CE Refresher training as requirements to being a trained CE (through CE Qual OJT). Also added DCPD CE qualification of CEPREPQ for CE qualified equivalent and point to procedure for CE qualification process.
Definitions	Updated SIF definitions to align with SAFE-1004S
3.8.2.c	Added “MUST be complete within 30 calendar days of being made available”
3.8.3	Added CORP-6010, CORP-6013, CE Roles and Responsibilities for CE Team Leads
3.8.3.c	Added “MUST be complete within 30 calendar days of being made available”
3.8.4	Added CORP-6010, CORP-6013, CE Roles and Responsibilities and CORP-6011 Cause Evaluation training for CE Sponsors
3.8.5	Added CORP-6010, CORP-6013, Yearly ECAP CARB Refresher training and CORP-6011 Cause Evaluation Training for CARB members
3.8.7	Require qualified CEs to renew their qualification every two years by: attending annual CE refresher training AND leading a cause evaluation OR passing a test.
Table 1 CE Team Training Requirements Matrix	Updated to reflect updated training requirements listed in Appendix A
4.6	Clarified that CARB provide oversight, review and approval of all RCEs, ACEs, CCEs and EFRs.

## Enterprise Cause Evaluation Standard

	Added requirement that CARB ensure CE Process is followed according to procedure.
4.7	Added requirement that FA CAP Manager ensure CE Process is followed according to procedure.

## Enterprise Cause Evaluation Standard

### Appendix A, Cause Evaluation Team Training Requirements Matrix

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Training Course	RCE / ACE / CCE Sponsor	RCE / ACE / CCE Team Lead	Cause Evaluator RCE / ACE / CCE	CARB Members
CORP-6010WBT, Introduction to Cause Evaluation	Required	Required	Required	Required
CORP-6013WBT, ECAP Cause Evaluation Training for Leaders	Required	Required	Recommended	Required
ECAP Cause Evaluation Team Member Roles and Responsibilities Training	Required	Required	Required	Recommended
ECAP CE Qual OJT	N/A	N/A	Required	N/A
ECAP Cause Evaluator Yearly Refresher Training	Recommended	Recommended	Required	Recommended
ECAP CARB Member Yearly Training	Recommended	Recommended	Recommended	Required
Cause Evaluation Training (1 from below) <ul style="list-style-type: none"> <li>• CORP-6011, ECAP Cause Evaluation Training</li> <li>• Legacy Training (ECAP-01, ECAP-02, &amp; ECAP-03)</li> <li>• Cause Evaluation Preparer Qualification (CEPREPQ)</li> </ul>	Recommended	Recommended	Required	Recommended

## **Attachment**

SAFE-3001S Enterprise Contractor Safety Management  
Standard\_Rev6\_redacted.pdf

# Enterprise Contractor Safety Management Standard

## SUMMARY

This Standard establishes the minimum requirements for contract partner safety management and ensures that health and safety expectations associated with the work performed on behalf of PG&E are understood and communicated.

Pacific Gas & Electric (PG&E), as the hiring company and asset owner, has a primary interest in protecting PG&E coworkers, contract partners, and the public from personal injury. Therefore, this standard fulfills the compliance requirements as agreed to in California Public Utilities Commission (CPUC) Decision 15-07-014 July 23, 2015.

## TARGET AUDIENCE

PG&E utility coworkers that manage contracts and oversee the work of contract partners (at any tier) as defined as “medium” and “high” risk, which perform work activities on behalf of PG&E on either PG&E-owned, or customer-owned sites and assets.

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## REQUIREMENTS

### 1 Contractor Partner Safety Program Scope

- 1.1 Contract partners defined as performing “medium” or “high” risk work types must meet PG&E prequalification requirements identified in [Attachment 1, “Contract partner Safety Prequalification Criteria,”](#) before commencing medium and high-risk work activities, which will be evaluated.
- 1.2 Agencies, entities, or contract partners that are not subject to the Enterprise Contractor Safety Management Standard requirements:
  1. Individual Augmented or contingent staffing contract partners working under the direct supervision of PG&E.
  2. Vendors, suppliers, manufacturers, professional services (e.g., engineering, design, etc.) contracted by PG&E to provide goods and services to PG&E where the work being performed is not on PG&E property or within PG&E’s right of way and not related to the maintenance and construction of PG&E infrastructure.

## Enterprise Contractor Safety Management Standard

- a. **Exception:** When PG&E has been awarded work as a Prime Contractor, whereas PG&E subcontracts work to other pre-qualified contractors.
3. Tribal entities that perform work as Native American Monitors for cultural resource management purposes.
4. Other utilities, governmental entities, and applicant installers (or their contract partners) that have the right under Commission decisions and rules, pursuant to tariffs, or under easement/license, franchise, service, or other agreements to perform work on PG&E facilities (joint pole/trench agreements, Work Requested by Others (WRO) projects, franchise/Community-Based Organization agreements).
- 1.3 PG&E personnel or designees responsible for overseeing contract partners must understand the risk definitions identified in [Attachment 2, "Enterprise Contractor Safety Risk Matrix."](#)
  1. These definitions must be considered as guidelines.
  2. These definitions are not all-inclusive.
  3. Project work activities must be reviewed by whom independently to assess risk during the project planning phase.
    - a. Review should include an evaluation as to whether using current industry best practices.
    - b. Functional Area (FA) to assess the level of risk accurately.
    - c. Review and update that risk assessment annually during contract performance to ensure accuracy.
- 1.4 Contracts/Agreements must identify PG&E's safety expectations and applicable safety keys.
- 1.5 All PG&E coworkers who manage contracts, execute contracts, purchase third-party services or oversee contract partner work must be properly (per employee's job function) profiled for CCSP Orientation Training/SAFE-0102.
- 1.6 At any tier, all contract partners and their subcontract partner(s) must provide and use appropriate personal protective equipment (PPE) as required per California Code of Regulations, Title 8, Section 3380, and PG&E's regulatory requirements specific to the hazards of the related task.
- 1.7 All records must be retained to provide evidence of compliance with external compliance requirements or commitments and internal requirements. Refer to [GOV-7101S, "Enterprise Records and Information Management Standard,"](#) for the definition of a record.
- 1.8 PG&E personnel or designees responsible for overseeing contracted work within the scope of this standard must manage all contracted work per the requirements herein and their FA-specific contract partner safety oversight procedure.

## Enterprise Contractor Safety Management Standard

- 1.9 PG&E personnel or designees responsible for overseeing contracted work activities defined as medium or high-risk must ensure contract partners are effectively identifying, planning, eliminating, or controlling work hazards that may impact the safety or health of the Company or contract partner coworkers and members of the public.
- 1.10 PG&E must evaluate the safety data for contract partners that are not pre-qualified when they are being considered for PG&E work through the Request for Proposal (RFP) process.
1. In RFPs (Request for Proposal), contract partners are required to provide year-to-date safety and injury data, including data regarding Serious Safety Incidents affecting the public.
    - a. Reference [Attachment 1, "Contract partner Safety Prequalification Criteria."](#)
    - b. Since industry-wide data regarding Serious Safety Incidents affecting the public are not available, PG&E will evaluate such data qualitatively to evaluate where the contract partner should be disqualified from consideration or if additional safety mitigation measures should be required. After hiring an independent contract partner, PG&E will require the contract partner to update coworker and public safety data annually. PG&E will require that bidders and contract partners attest to the accuracy of safety data. PG&E will require a contract partner to become pre-qualified through ISNetwork (ISN) as a condition of any contract award for medium or high-risk work.
- 1.11 Every PG&E contract partner is required to ensure its own workforce is trained and qualified to perform the work for which the coworkers were hired. The contract partner must also provide the appropriate PPE, tools, and equipment associated with each coworker's job scope, along with the required training.
- 1.12 PG&E may require contract partners to adhere to PG&E specific standards and procedures when the required work practices are "above and beyond" or "different than" current regulatory requirements and the requirements of the contract partners' own standards and procedures. In such cases, PG&E is obligated to inform and train contract partners where necessary.
- 1.13 PG&E will inform and where necessary train contract partners to hazards or risk unique/specific to PG&E premises, equipment, facilities that are known to PG&E but unknown to a contract partner prior to performing work.

## 2 Roles & Responsibilities

**NOTE**

The following roles and responsibilities should NOT be considered all-inclusive.

- 2.1 Contract partners must:

## Enterprise Contractor Safety Management Standard

1. Perform all work, and cause all subcontract partners, at all tiers, to perform all applicable work as specified in contract terms and conditions. Refer to [Contract partner Safety Program Contract Requirements](#) included in all contracts for medium and high-risk work. The contract terms and conditions include, but are not limited to:
  - a. Contract partner must not allow any subcontract partner to start any work for which prequalification is required without first obtaining written approval from PG&E that the subcontract partner has satisfied PG&E's prequalification requirements.
  - b. Contract partner recognizes and agrees that safety is paramount in performing any work for PG&E, regardless of the risk level. Contract partner must perform all work safely, in compliance with PG&E's Contract partner Safety Program, Contract partner's safety program, and any additional safety standards, procedures, rules, or requirements outlined in the Contract, and hold their subcontract partners (at all tiers) to the same high standards.
  - c. Provide subcontract partners with PG&E's Contract partner Safety Program requirements and ensure subcontract partner compliance.
2. Prime contract partners evaluate the safety performance of all subcontract partners performing any active work during the given calendar year.
3. Safety performance evaluations must include the following minimum performance evaluation criteria:
  - a. Worksite hazard mitigation
  - b. Training and qualifications compliance
  - c. Work site safety performance (observations)
  - d. Safety incident and injury prevention and reporting
  - e. Development and implementation of a PG&E-approved safety plan
  - f. Speak Up and Stop Work Authority
  - g. Wildfire Prevention and Mitigation
4. Prime contract partners may use a repository of their choosing, but records must be retained and provided to PG&E upon request.
5. Evaluation records may be requested due to safety performance and at PG&E's discretion.
6. Adhere to PG&E's Phone-Free Driving Policy (See Section 3, PG&E Phone-Free Driving Policy)

## Enterprise Contractor Safety Management Standard

### 2.2 Functional Areas (FA) must:

1. Endorse and support the enterprise-wide application of SAFE- 3001S, Enterprise Contractor Safety Management Standard.
2. Develop Contract partner Safety Oversight Procedures, which must be housed within the Guidance Document Library under Public and Third-Party Safety, specifically SAFE-3001S, "Enterprise Contractor Safety Management Standard," and be consistent in its naming convention to align with SAFE-3001S (i.e., SAFE-3001P-XX).
3. Contract partner Safety Oversight Procedures must provide guidelines for the following:
  - a. Determining the level of contract partner oversight, establishing the frequency of safety observations, and entering observations into SafetyNet or the FA-established tool.
  - b. Ensure a schedule is developed for safety observations before beginning medium and high-risk work activities.
  - c. Ensure contract partners provide the appropriate levels of safety oversight for their work and that of their subcontract partners at any tier.
  - d. Ensure PG&E provides the appropriate level of safety observations for all contracted work including subcontracted work that is geographically remote from their primary contract partner.
  - e. Be approved by the respective FA Director Sponsor initially and for any procedure revisions to ensure alignment with the requirements herein.
  - f. Define the process for the FA to actively monitor the ISN status of their contract partners and subcontract partners.
  - g. Define requirements for scanning ISN badges to field-verify contract partner prequalification and required coworker training.
  - h. Define requirements that all contract partners complete the Corporate Contract partner Safety Awareness training course (SAFE-0101) before commencement of work.
  - i. Identify Safety Plan Approver roles, responsibilities, and qualification to include the requirements as outlined in SAFE-3001P-20, ["Enterprise Contractor Safety Plan Management Procedure."](#)
  - j. For high-risk work, the oversight procedure must address how to determine whether PG&E will assign its own onsite safety personnel or safety contractor, which must have an understanding of high energy exposure(s) and what controls must be in place.

## Enterprise Contractor Safety Management Standard

- k. Ensure contract partners understand and adhere to PG&E's Phone-Free Driving Policy (See Section 3, PG&E Phone-Free Driving Policy).
4. FA's Contract partner Safety Oversight Procedures must be reviewed for accuracy annually and revised as needed to incorporate any revisions to SAFE-3001S, "Enterprise Contractor Safety Management Standard."
5. Mandate compliance with SAFE-3001S, "Enterprise Contractor Safety Management Standard," and the FA Contract partner Safety Oversight Procedure requirements.
6. Develop, communicate, and implement clearly defined roles and responsibilities specific to the organizational structure and unique operational needs to ensure compliance with this standard.
7. Ensure Contract partner Safety Oversight Procedures' requirements are adhered to throughout contracted work, even when there may be project management overlap between one or more FAs.
8. Coordinate with Enterprise Health & Safety (EHS) on the required compliance assessments being performed for their respective areas and provide all necessary documentation within the period requested.
9. Identify and communicate PG&E-specific hazards to the contract partner to assist in planning their work efficiently.
10. Support Supply Chain or authorized procurement representative with the evaluation and selection of contract partners based on the prequalification requirements of this standard.
11. Partner with the appropriate safety representative(s) or independent party expert before commencing work to determine:
  - a. Applicable PG&E requirements.
  - b. Regulatory requirements.
  - c. Appropriate controls to eliminate or mitigate hazards specific to the SOW.
  - d. Contract partners and their subcontract partners (at any tier) have fully completed the prequalification process and received an A or B grade before commencing work.
  - e. If applicable, partner with Supply Chain or authorized procurement representative to formally submit a [SAFE-3001P-11, "Contractor Safety Prequalification Variance Request Procedure"](#) or an [SAFE-3001P-12, "Emergent Work Request"](#).
12. Ensure PG&E safety requirements and expectations have been communicated and acknowledged by the contract partner before commencing work activities.

## Enterprise Contractor Safety Management Standard

13. Verify contract partners have performed a daily JHA (Job Hazard Analysis) specific to the SOW for identifying and communicating known or potential hazards to their coworkers or other potentially impacted workforces before commencing work.
  - a. Require the contract partner provide a safety plan for all high-risk work that fully addresses the scope-specific work to be performed.
  - b. Contractors and Subcontractors must complete their own daily JHAs and Pre-Job Safety Briefings prior to commencing work. Definitions and expectations of JHAs and Pre-Job Safety Briefings are outlined in [SAFE-3001P-20, "Enterprise Contractor Safety Plan Management Procedure."](#)
14. Ensure all safety plans are completed as outlined in [SAFE-3001P-20, "Enterprise Contractor Safety Plan Management Procedure."](#)
  - a. The safety plan must address:
    - The SOW to be performed.
    - Training qualifications necessary to perform the work.
    - Staffing plans for safety professionals that will provide oversight, if applicable.
15. Monitor the work, conduct, and record safety observations per frequency as defined in the FA oversight procedures. (The SafetyNet tool is available to use at the FA's discretion if no other tool has been established.)
16. Before commencement of work by the contract partner, the FA will:
  - a. Validate contract partners and subcontract partners (at any tier) performing medium and high-risk work are prequalified (A or B grade) in ISN.
  - b. Confirm the contract partner and subcontract partner/s comply with the ISN badging and training requirements.
  - c. Ensure contract partners and subcontract partners have completed the Corporate Contract partner Safety Awareness training course (SAFE-0101), as well as any other PG&E required training.
  - d. Review and approve the safety plan, including contract partner safety personnel qualifications as applicable, per [SAFE-3001P-20, "Enterprise Contractor Safety Plan Management Procedure."](#)
  - e. Establish requirements and process for the FA to perform quality assurance review and approval of contract partner's safety plans.

## Enterprise Contractor Safety Management Standard

- f. Establish requirements for implementing site safety controls at work sites to ensure all visitors, contract partners, sub-contract partners, PG&E coworkers, and members of the public are informed of hazards and controls required for the work location before commencement of work.
  - g. Perform a safety analysis to evaluate whether additional safety mitigations are required, including whether to assign PG&E onsite safety personnel (or safety consultants).
  - h. Ensure personnel familiar with the job hazards and safety requirements specific to the SOW are assigned to monitor contract partner safety compliance.
17. Partner with Supply Chain or authorized procurement representative, Corporate Safety, or other subject matter experts to ensure compliance with this standard, before making significant changes to the SOW.
18. Ensure all contract partner-related Serious Safety Incidents or Serious Injury and Fatalities (SIFs) are reported.
- a. A contract partner fatality, serious injury or illness, inpatient hospitalization, permanent disfigurement, loss of any bodily member, electrical contact or flash requiring medical attention, systemic incident, serious concealed danger, or use of emergency services must be reported by the FA representative to the Safety Helpline at (415) 973-8700, Option 1.
  - b. Reference [SAFE-1002S, "Motor Vehicle Safety Standard"](#) for an event involving a PG&E coworker or Contract partner in an owned, leased, rented, or a personal vehicle being operated for PG&E business, which results in damage to any property or vehicles; injury to any coworker, contract partner, or 3rd party; or fatality to any coworker, contract partner, or 3rd. party.
19. Validate that corrective actions have been developed and implemented for all Serious Incidents or Serious Injury and Fatality (SIF) per [GOV-6103S, "Enterprise Contractor Cause Evaluation Standard."](#)
20. Ensure lessons learned are communicated to PG&E and contract partner personnel.
21. Collaborate to ensure all Serious Safety Incidents, Serious Injury and Fatality (SIF) incidents are investigated using causal analysis methodologies per [GOV-6103S, "Enterprise Contractor Cause Evaluation Standard."](#)
22. Monitor process improvements, progress against contract partner safety requirements, and communicate FA process gaps, in a timely manner, to FA leadership for correction.
23. Ensure process metrics or milestones are being met and appropriate actions to improve performance are initiated.

## Enterprise Contractor Safety Management Standard

24. While FA representatives must evaluate the safety performance of every prime contract partner, prime contract partners must evaluate the safety performance of every subcontract partner performing any active work during the given calendar year and include the same minimum performance evaluation criteria. (Refer to Section 2.1.2.)
25. Contract partner Safety Performance Evaluations must be completed in ISN for the applicable ISN Site using the appropriate Protocol (ISN evaluation form).
  - a. Programmatic contracts require a Contract partner Safety Performance Evaluation at the conclusion of the contracted work or at least once every calendar year.
  - b. Project-specific contracts require one Contract partner Safety Performance Evaluation at the completion of the named project, including projects that extend beyond the calendar year.
26. If the prime contract partner has both a programmatic and a project-specific contract, the named project would be treated as one of the contract partner's multiple projects, and only one safety evaluation is required at the end of the calendar year.
27. Potential ISN grade impact will be based on an average of all evaluations submitted within the prior 12-months.
28. Contract partner Safety Performance Evaluations will be factored in when determining future award contracts.
29. At a minimum, performance evaluation criteria must assess the contract partner's overall safety performance for the project, including contract partner controlled:
  - a. Work site hazard mitigation.
  - b. Training and qualifications compliance.
  - c. Work site safety performance (observations).
  - d. Safety incident and injury prevention and reporting.
  - e. Development and implementation of a PG&E approved safety plan.
  - f. Speak Up and Stop Work Authority.
  - g. Wildfire Prevention and Mitigation.
  - h. Effectiveness in managing the safety performance of their subcontract partners, at all tiers, if applicable.
30. Contract partner Safety Forums are intended to enhance the client-contract partner relationship and create mutual ownership and responsibility of safety goals.

## Enterprise Contractor Safety Management Standard

31. Forums are to be conducted at least quarterly and must include prime contract partners that have active multi-year agreements.
32. Forums may be in-person or remote, or a combination of both.
33. The agenda must include PG&E specific safety topics, sharing lessons learned, and performance feedback.
34. Required topics for inclusion include:
  - PG&E Specific Safety Topics (applicable Keys to Life).
  - Lessons Learned based on observations and incidents.
  - Contract partner safety performance (Leading / Lagging Indicators).
  - Focus areas for improvement (Leading / Lagging Indicators).
35. Suggested topics for inclusion include:
  - Best practices.
  - Subcontract partner management.
  - PG&E safety plan management.
  - Safety & Security (i.e., disgruntled customers, acts of violence).
  - Wildfire risk mitigation.
  - Incident reporting and Cause Evaluation Expectations.
  - Driving Safety.
  - Safety Culture.
  - Safety Leadership.
  - Training / Operator Qualifications.
  - Fitness for Duty.
  - ISN Grade Impacts (how to avoid them and recover).
36. For assistance in completing, viewing, or editing an evaluation within ISN, see [Attachment 3. "How to Complete and View/Edit an Evaluation Report."](#)

## Enterprise Contractor Safety Management Standard

37. IF a contract partner's safety performance is experiencing a significant adverse trend and warrants a pause or work stoppage, then review and initiate [SAFE-3001P-24, "Enterprise Contractor Safety Stand Down and Probation Procedure"](#).
38. If a FA undergoes a re-organization, ensure all supporting positions are staffed appropriately and knowledge transfer occurs to safeguard the requirements as set forth in the Enterprise Contractor Safety Standard.

### 2.3 Supply Chain or authorized procurement representatives must:

1. Ensure applicable contract partners have fully completed the prequalification requirement before contract award.
  - a. If circumstances will not allow compliance with prequalification requirements, then reference [SAFE-3001P-11, "Contract partner Safety Prequalification Variance Request Procedure."](#)
2. Ensure contractual agreements include PG&E contract partner safety requirements and compliance expectations.
3. Supply Chain, Contract Management, or authorized procurement representatives support the FA during the contract partner evaluation and selection process.

### 2.4 EH&S must:

1. Oversee the development, maintenance, and continual improvement of the Enterprise Contractor Safety Management Standard.
2. Communicate this standard to the appropriate FA stakeholders.
3. Partner with the FA and Supply Chain or authorized procurement representatives to formally submit a [Contract partner Safety Prequalification Variance Request \(SAFE-3001P-11\)](#) or an [Emergent Work Request \(SAFE-3001P-12\)](#).
4. Assist as a subject matter expert for identifying job specific hazards and the appropriate elimination or control methods.
5. Provide subject matter expertise for interpreting applicable PG&E and regulatory standards, rules, codes, or industry best practices.
6. Perform assessments on the implementation of the FA contract partner oversight procedures to validate compliance with the requirements therein, including assessing the contract partner's safe work performance.
  - a. The field portion of the assessments may be performed unannounced.
7. Perform assessments on contract partners that have been in business less than 3 years and those that have had a significant increase in headcount.

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- a. Refer to [SAFE-3001P-19, "Enterprise Contractor Management Organizational Assessment \(MOA\) Procedure"](#) for additional information.
8. Perform additional field safety observations independent of the FA observations as deemed appropriate between the FA and EH&S.
9. Provide governance over the processes for flagging problematic contract partners and sharing lessons learned from contract partner related safety incidents.
10. Manage the ISN contract and govern the requirements for prequalification criteria.
11. If the FA commits to partnering with the contract partner to rectify the grade immediately, EH&S may grant permission for contract partners to continue to work, for no longer than 30 days, with a negative grade impact in ISN.
  - a. The temporary approval (grace period) is only applicable to the following circumstances:
    - Failure to submit the annual Experience Modification Rate document
    - Failure to acknowledge any of the required Attestation Forms (i.e., Data, Training)
    - Failure to respond to a Management and Organizational Assessment (MOA) request
    - Failure to receive a full 100% score on their Written Safety Programs
  - b. The 30-day grace period would not include a negative grade impact that is beyond a temporary nature which includes:
    - Unsatisfactory Safety, Health and Environmental (SHE) Statistics including poor safety performance for the past 3 years (Total Recordable Incident Rate [TRIR], Days Away, Restricted, Transferred [DART]).
    - Unsatisfactory SHE Statistics including (Occupational Safety and Health Administration [OSHA]) Citations/Violations for the past 3 years.
    - Unsatisfactory SHE Statistics including serious injury/fatality involving a coworker or member of the public for the past 3 years.
12. Schedule Contract partner Safety Leadership/Engagement Annual Forums with our internal stakeholders to communicate Enterprise Contractor Safety projects.
13. Identify the top high-risk contract partners who are experiencing an adverse trend in safety performance to determine if a Contract partner Safety Quality Assurance Review (CSQAR) should be undertaken.

## Enterprise Contractor Safety Management Standard

14. Monitor ISN grade changes and evaluate contract partner profiles as needed.

2.5 EOC/REC/OEC Safety Officer must:

1. Prequalify a contractor if needed during an emergency activation but is not pre-qualified in ISN. The Safety Officer assigned to the EOC/REC/OEC must review the contractor's Injury Illness Prevention Program (IIPP), to ensure all 8 elements are met per Title 8 Cal/OSHA. This is the minimum requirement to be met before the utilization of the contractor to perform work for PG&E during Emergency Operations.
2. The IIPP must be a written plan that includes procedures which are put into practice. The elements required are:
  - Management commitment/assignment of responsibilities
  - Safety communications system with employees
  - System for assuring employee compliance with safe work practices
  - Scheduled inspections/evaluation system
  - Accident investigation
  - Procedures for correcting unsafe/unhealthy conditions
  - Safety and health training and instruction; and
  - Recordkeeping and documentation

**NOTE**

[DOSH - Guide to Developing Your Workplace Injury and Illness Prevention \(ca.gov\)](https://www.dir.ca.gov/dosh/dosh_publications/dosh-guide-to-developing-your-workplace-injury-and-illness-prevention-ca.gov)

3. The Safety Officer must ensure that the contractor is adequately onboarded and that the contractor has identified all the relevant high energy hazards and implemented the necessary controls to perform the work safely.

2.6 ISN (Safety Prequalification Contracted Third Party Administrator) must:

1. Prequalify contract partners to PG&E safety criteria. (See [Attachment 1, "Contract partner Safety Prequalification Criteria."](#))
2. Perform written safety program audits to ensure compliance with regulatory standards and PG&E requirements.
3. Maintain, as a system of record, all program-related documents, evaluations, and files uploaded into the ISN system.

## Enterprise Contractor Safety Management Standard

### 3 PG&E Phone-Free Driving Policy

#### 3.1 Prohibited Uses of Cell Phones, Hand-Held, and Hands-Free/Bluetooth® Devices:

1. California law prohibits the writing, sending, or reading of text-based communications (email, text messages, instant messages, GPS) while driving a motor vehicle.
2. While California law allows drivers 18 years and older to use hands-free phones while driving, PG&E coworkers and contract partners are prohibited from using hands-free phones, including Bluetooth® Devices (Smart Watch, etc.) or other wired earpieces while driving on PG&E Business. Specifically, all coworkers and contract partners may NOT use Cellular phones or other Bluetooth® Devices while driving to:
  - Make voice calls
  - Answer voice calls
  - Listen to or participate in conference calls
  - Call or listen to voicemail messages
  - Send voice-activated texts
  - Program or set any device's GPS or mapping services
  - Access other programs

#### 3.2 Permissible Uses of Cell Phones, Hand-Held, and Hands-Free/Bluetooth® Devices:

- Cellular Phones, Hand-Held, and Hands-Free/Bluetooth® Devices may be used while safely and legally parked.
- Cellular Phones may be used as a GPS, provided the course is set prior to the trip or departure from the vehicle's parked location.
  - a. Any changes that require physical interaction with the device will only be conducted after being safely and legally parked in the vehicle.
- All Cellular Phones or electronic wireless communication devices used for GPS must be mounted and secured in accordance with applicable state laws. (See California Vehicle Code section 23123.5 and 26708.)

#### 3.3 Emergencies

## Enterprise Contractor Safety Management Standard

1. In the event of an emergency, coworkers and contract partners may use a Cellular Phone and/or Bluetooth® Device while the vehicle is in motion to make an emergency call to a law enforcement agency, a medical provider, the fire department, or other emergency service provider agencies.
  2. Contract partners and coworkers may use their Cellular Phones and Bluetooth® Devices during an operational emergency as determined by SAFE-3001S,
- 3.4 Two-Way Radios:
1. Two-way radios installed in personally owned, contract partner-owned, or leased vehicles may be used while driving by coworkers and contract partners whose job duties require them.
    - a. Conversations should be limited to dispatch purposes and emergency response activities.
  2. Two-way radios must not be used for direct dialing another user.
    - a. Two-way radios are permissible on group talk frequencies.

### END of Requirements

## DEFINITIONS

**Bluetooth® Device:** Smart technology wireless communications system intended to replace the cables connecting many types of devices, from mobile phones and headsets to hear monitors and medical equipment. Examples may include but are not limited to earpieces, headphones, car systems, smart watches, etc. Bluetooth devices are included under “Hands-Free Devices.”

**Cellular Phone:** A portable telephone that uses wireless cellular technology to send and receive phone signals.

**Company:** Refers to the PG&E Company, as the utility wholly owned by PG&E Corporation.

**Company Business:** Any situation where a coworker can be paid or reimbursed for mileage, participating in PG&E business-related call or meeting, or reviewing a PG&E or contract company communication (whether or not being paid).

**Contract partner:** Company directly hired by PG&E to complete a specific SOW or service. This term also applies to all subcontract partners, at any tier, which have been retained by a primary PG&E contract partner to provide a service for PG&E related project work. Additionally, the term “subcontract partner” may include an individual, a group of workers (crew), equipment or other items used on a PG&E facility, project, or assets.

**Contract partner Safety Forum:** A valuable gathering for the purpose of discussing PG&E specific safety topics, sharing lessons learned, performance feedback, typically involving a panel of presenters and often including audience participation.

## Enterprise Contractor Safety Management Standard

**Contract partner Safety Quality Assurance Review (CSQAR):** A detailed assessment of the contract partner's safety program implementation, safety culture and field safety performance. The process includes a desktop review, safety culture survey, barrier analysis and leadership engagement.

**Covered Devices:** This standard applies to the use of any hand-held portable, or vehicle-installed electronic device or system, including but not limited to cell phones, smartphones, tablets, laptops, global positioning/navigation system devices (GPS), video systems, and two-way radios.

**Enterprise Contractor Safety (ECS):** The team charged with overseeing the Enterprise Contractor Safety program and communicating the requirements to the FAs. ECS is found within the Enterprise Health and Safety department.

**Emergent Work:** Unplanned/unscheduled contract medium/high-risk services required to immediately support critical project work which cannot be acquired through normal procurement processes. Situations do NOT include routine work activities and immediate project work required due to lack of planning.

**Hand-Held Devices:** Drivers are prohibited from using a hand-held device while driving a vehicle. Prohibited activities include but are not limited to talking, texting, listening, reading messages, typing, dialing, setting up a wireless connection, programming a GPS, watching a video/DVD, talking on a two-way radio, searching for a phone number or other information, etc.

**Hands-Free Devices:** The use of hands-free Covered Devices while driving a vehicle may be permitted by local law; however, it is prohibited by PG&E. Visual / Manual tasks performed on hands-free devices, including but not limited to dialing, typing, reading messages, setting up a wireless connection, programming a GPS, watching a video/DVD, and searching for a phone number or other information, are strictly prohibited while driving a vehicle, and must instead be accomplished when the vehicle is parked in a safe location.

**High Risk Contract partners:** As defined by Attachment 2, "Enterprise Contractor Safety Risk Matrix."

**Independent Party Expert:** Consulting subject matter expert (SME) with authority and expertise in a particular area or work activity not readily available within PG&E's existing personnel. They may have specialized education, experience, qualifications, or certifications required to oversee the work activities being performed.

**Life-Altering Injury:** An acute injury that resulted in a permanent and significant loss of a major body part or organ function that permanently changes or disables that person's normal life activity.

**Life-Threatening Injury:** An acute injury that required immediate life-preserving rescue action, and if not applied immediately would have resulted in the death of that person.

## Enterprise Contractor Safety Management Standard

**Line of Business (FA) Representative or Designee:** Individual assigned as the primary interface with the contract partner to coordinate and oversee a specific SOW performed by the contract partner.

**Low Risk Contract partner:** As defined by Attachment 2, “Enterprise Contractor Safety Risk Matrix.”

**Medium Risk Contract partner:** As defined by Attachment 2, “Enterprise Contractor Safety Risk Matrix.”

**Prime Contract partner:** Company directly hired by PG&E to complete a specific Scope of Work or service.

**Program:** Multiple projects, across multiple locations which are managed and delivered as a single package.

**Programmatic Contract:** An agreement between PG&E and a contract partner to complete multiple projects within a set time, such as during a one-year period. Programmatic projects may support one or more programs. The contract partner may be directed to perform various projects, and the projects may be unrelated.

**Project:** A specific, singular endeavor to deliver a tangible output. A project may be a stand-alone effort, or it may be part of an overarching program. A project is typically referred to as a ‘job’ (i.e., pole replacement, a Rule 20), and work is typically performed at one location.

**Project-Specific Contract:** An agreement between PG&E and a contract partner to complete a single project, regardless of size or scope, including a formal project bundle. The contract scope is limited to the project or projects named in the contract. An additional contract or contracts would be required for the contract partner to perform other projects.

**Safety Plan:** Detailed safety plan created to eliminate and/or mitigate specific job site environmental, health and safety hazards associated with the SOW.

**Safety Prequalification Contracted Administrator:** ISNetwork is the contracted vendor responsible for safety prequalification for in-scope contract partners.

**Safety Representative:** Individual(s) responsible for the health and safety of all personnel within their designated area of control and vested with the decision-making authority for ensuring compliance with PG&E and regulatory requirements.

**Scope of Work (SOW):** A scope of work contains a detailed description of service, project, or program work activities.

**SIF Actual:** Per [SAFE-1100S, “Serious Injury and Fatality \(SIF\) Standard,”](#) a work-related high-energy incident from work at or for PG&E resulting in any of the following to coworkers, contract partners, or directly supervised contract partners:

- A fatality – work related fatal injury or illness;

## Enterprise Contractor Safety Management Standard

- A life-threatening injury or illness that required immediate life-preserving action that if not applied immediately would have resulted in the death of that person;
- A life-altering injury or illness that resulted in a permanent and significant loss of a major body part or organ function.

**SIF Potential:** Per [SAFE-1100S, "Serious Injury and Fatality \(SIF\) Standard,"](#) a high-energy incident in the absence of a direct control where a fatality or life-threatening or altering injury is not sustained.

**Subcontract partner:** Subcontract partners are contract partners that have been retained by a prime contract partner to provide services on behalf of PG&E.

**Tier:** A prime contractor is directly hired by PG&E to complete a specific SOW or service. A first-tier contractor is directly hired by the prime contractor. A second-tier contractor is directly hired by the first-tier contractor. A third-tier contractor is directly hired by the second-tier contractor, and so forth. All, but the prime contractor directly hired by PG&E are subcontractors to PG&E.

### IMPLEMENTATION RESPONSIBILITIES

PG&E's Enterprise Health & Safety organization is responsible for:

- Overseeing the development and ongoing maintenance of the Enterprise Contract Safety Management Standard
- Communicating this standard to the appropriate audience within PG&E.

### GOVERNING DOCUMENT

NA

### COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

#### Records and Information Management:

PG&E records are company assets that must be managed with integrity to ensure authenticity and reliability. Each Line of Business (LOB) must manage Records and Information in accordance with the Enterprise Records and Information (ERIM) Policy, Standards and Enterprise Records Retention Schedule (ERRS). Each Line of Business (LOB) is also responsible for ensuring records are complete, accurate, verifiable and can be retrieved upon request. Refer to [GOV-7101S, "Enterprise Records and Information Management Standard"](#) for further records management guidance or contact ERIM at [Enterprise\\_RIM@pge.com](mailto:Enterprise_RIM@pge.com).

[California Public Utilities Commission Decision 15-07-014 July 23, 2015](#)

[California Code of Regulations, Title 8, Section 3380](#)

## Enterprise Contractor Safety Management Standard

### REFERENCE DOCUMENTS

#### Developmental References:

- Diablo Canyon Power Plant: Interdepartmental Administrative Procedure
- [LAW-2001S, "Contracting Requirements Standard"](#)
- [GOV-6102S, "Enterprise Cause Evaluation Standard"](#)
- [Supplier Code of Conduct](#)

#### Supplemental References:

- [Contract partner Safety Program Contract Requirements](#)
- [GOV-6103S, "Enterprise Contractor Cause Evaluation Standard"](#)
- [GOV-7101S, "Enterprise Records and Information Management Standard"](#)
- [SAFE-1002S, "Motor Vehicle Safety Standard"](#)
- [SAFE-3001P-11, "Contract partner Safety Prequalification Variance Request Procedure"](#)
- [SAFE-3001P-12, "Emergent Work Request Procedure"](#)
- [SAFE-3001P-19, "Enterprise Contractor Management Organizational Assessment \(MOA\) Procedure"](#)
- [SAFE-3001P-24, "Enterprise Contractor Safety Stand Down and Probation Procedure"](#)
- [SAFE-3001P-20, "Enterprise Contractor Safety Plan Management Procedure"](#)
- California Vehicle Code section 23123 - Driving a motor vehicle using a wireless telephone.
- California Vehicle Code section 23123.5 - Driving a motor vehicle while writing, sending, or reading text-based communication.
- California Vehicle Code section 26708 – Global Positioning System (GPS) mounting

### APPENDICES

NA

# Enterprise Contractor Safety Management Standard

## ATTACHMENTS

[Attachment 1, Contract partner Safety Prequalification Criteria](#)

[Attachment 2, Enterprise Contractor Safety Risk Matrix](#)

[Attachment 3, How to Complete and View/Edit an Evaluation Report](#)

## DOCUMENT REVISION

This document supersedes SAFE-3001S, Contract Safety Standard, Rev. 5

## DOCUMENT APPROVER

██████████, Director, Enterprise Contractor Safety

## DOCUMENT OWNER

██████████, Director, Enterprise Contractor Safety

## DOCUMENT CONTACT

██████████, Safety Program Manager, Enterprise Contractor Safety

██████████, Safety Program Manager, Enterprise Contractor Safety

## REVISION NOTES

Where?	What Changed?
Title	Added "Management" to title
Section 1.6	Added CCR Title 8, Section 3380, PPE (Personal Protective Equipment) requirements
Section 1.2.2	Added – Vendors, suppliers, manufacturers, professional services (e.g. engineering design) contracted by PG&E to provide goods and services to PG&E where the work being performed is not on PG&E property or within PG&E's right of way and not related to the maintenance and construction of PG&E infrastructure.
Section 1.2.2.a.	Added – Exception: When PG&E has been awarded work as a Prime Contractor, whereas PG&E subcontracts work to other pre-qualified contractors.
Section 1.11	Added – Every PG&E contract partner is required to ensure its own workforce is trained and qualified to perform the work for which the coworkers were hired.
Section 1.12	Added – PG&E may require contract partners to adhere to PG&E specific standards and procedures when the required work practices are "above and beyond" or "different than" current regulatory requirements and the requirements of the contract partners' own standards and

## Enterprise Contractor Safety Management Standard

	procedures. In such cases, PG&E is obligated to inform and train contract partners where necessary.
Section 1.13	Added – PG&E will inform and where necessary train contract partners to hazards or risk unique/specific to PG&E premises, equipment, facilities that are known to PG&E but unknown to a contract partner prior to performing work.
Section 1.7	Added reference to GOV 7101S, Records Management Standard
Section 2.2.28	Added reference that the Contract partner Safety Performance Evaluations will be factored in when determining future award contracts
Section 2.2.38	Added – If a FA undergoes a re-organization, ensure all supporting potions are staffed appropriately and knowledge transfer occurs to safeguard the requirements as set forth in the Enterprise Contractor Safety Standard
Section 2.2.7	Added- The FA contract owner must ensure their procedure requirements are adhered to throughout the course of work for the contract partner, even when there may be project management overlap between one or more FA's
Section 2.3.18.b	Added SAFE-1002S, Motor Vehicle Safety Standard
Section 2.2.25 - 2.2.29	Incorporated Utility Bulletins SAFE-3001S-B002 and SAFE-3001S-B003
Section 2.2.36	Incorporated Attachment 3, Contract partner Safety Standard- Post-Job Evaluations Job Aid, How to Complete and View/Edit an Evaluation Report
Section 2.4.12	Changed Contract partner Safety Leadership/Engagement Forums from quarterly to annual.
Section 2.4.13	Added- Contract partner Safety Quality Assurance Review (CSQAR)
Section 2.5	Added – EOC/REC/OEC responsibilities during Emergency Operations
Section-Definitions	Added-Additional definitions - "Cellular Phone," "Bluetooth© Device," "Company Business," "Covered Devices," "Hand-Held Devices," "Hands-Free Devices"
Document Stewardship	Updated Approver from Diane Thurman to Jack Suehiro and Owner/Contact from Keith Newsome to Kristin Hollinger and Janet Hashimoto
Table of Contents	Added – "Phone Policy"
Section 3.0	Added -- 3.1-3.4; "Prohibited Uses of Cell Phones", "Hand-Held, and Hands-Free/Bluetooth© Devices", "Permissible Uses of Cell Phones", "Hand-Held, and Hands-Free/Bluetooth© Devices", "Emergencies", and "Two-Way Radios"
Supplemental Resources	Added – CA Vehicle Code sections 23123, 23123.5, and 26708

**PG&E Gas and Electric  
Advice Submittal List  
General Order 96-B, Section IV**

AT&T  
Albion Power Company

Alta Power Group, LLC  
Anderson & Poole

Atlas ReFuel  
BART

Barkovich & Yap, Inc.  
Braun Blaising Smith Wynne, P.C.  
California Community Choice Association  
California Cotton Ginners & Growers Assn  
California Energy Commission

California Hub for Energy Efficiency  
Financing

California Alternative Energy and  
Advanced Transportation Financing  
Authority  
California Public Utilities Commission  
Calpine

Cameron-Daniel, P.C.  
Casner, Steve  
Center for Biological Diversity

Chevron Pipeline and Power  
City of Palo Alto

City of San Jose  
Clean Power Research  
Coast Economic Consulting  
Commercial Energy  
Crossborder Energy  
Crown Road Energy, LLC  
Davis Wright Tremaine LLP  
Day Carter Murphy

Dept of General Services  
Don Pickett & Associates, Inc.  
Douglass & Liddell  
Downey Brand LLP  
Dish Wireless L.L.C.

East Bay Community Energy Ellison  
Schneider & Harris LLP

Electrical Power Systems, Inc.  
Fresno  
Engineers and Scientists of California

GenOn Energy, Inc.  
Green Power Institute  
Hanna & Morton  
ICF

iCommLaw  
International Power Technology  
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin  
Kelly Group  
Ken Bohn Consulting  
Keyes & Fox LLP  
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated  
Waste Management Task Force  
MRW & Associates  
Manatt Phelps Phillips  
Marin Energy Authority  
McClintock IP  
McKenzie & Associates

Modesto Irrigation District  
NRG Solar

OnGrid Solar  
Pacific Gas and Electric Company  
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

Redwood Coast Energy Authority  
Regulatory & Cogeneration Service, Inc.

Resource Innovations

SCD Energy Solutions  
San Diego Gas & Electric Company

SPURR  
San Francisco Water Power and Sewer  
Sempra Utilities

Sierra Telephone Company, Inc.  
Southern California Edison Company  
Southern California Gas Company  
Spark Energy  
Sun Light & Power  
Sunshine Design  
Stoel Rives LLP

Tecogen, Inc.  
TerraVerde Renewable Partners  
Tiger Natural Gas, Inc.

TransCanada  
Utility Cost Management  
Utility Power Solutions  
Water and Energy Consulting Wellhead  
Electric Company  
Western Manufactured Housing  
Communities Association (WMA)  
Yep Energy