

From: Malashenko, Elizaveta I.  
Sent: 9/13/2013 5:13:37 PM  
To: Doll, Laura (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=LRDD);  
Redacted  
Cc:  
Bcc:  
Subject: FW: Important Reminder: Job Site Safety

Laura and Reda,

Please see below the reminder of job site safety policy that I have just sent to CPUC and BV staff. There are some requirements that apply to PG&E, specifically what to do when safety procedures or directions are not being followed. Please ensure that these requirements are well understood by field employees, particularly by site supervisor or similar responsible parties. Please report all instances where CPUC staff or CPUC contractors perform actions that are not safe or do not follow safety related direction.

Let me know if you have any questions or concerns.

Regards,

Liza

**From:** Malashenko, Elizaveta I.  
**Sent:** Friday, September 13, 2013 5:01 PM  
**To:** SED Gas Safety & Reliability Branch  
**Cc:** Hagan, Jack (Brigadier General – CA)  
**Subject:** Important Reminder: Job Site Safety  
**Importance:** High

**All visitors to utility work sites, including CPUC inspectors and CPUC contractors performing work under contract with the CPUC, must adhere to safety procedures of the utility at all times.**

The purpose of this memo is to remind everyone of the importance of following safety procedures on job sites. In particular, this memo outlines specific requirements and procedures for those performing inspection and audit work on Pacific Gas and Electric (PG&E) projects. PG&E has requested for the job site safety procedure requirements to be re-communicated to all who visit the job sites and those requirements are articulated here.

**Everyone must adhere to the following:**

- All visitors to job sites must notify the site supervisor, or similar responsible party, of their presence and purpose on the site. The correct person is usually the lead inspector or construction manager. On PG&E Pipeline Safety Enhancement Plan (PSEP) projects, the lead inspector or construction manager will likely be a PG&E contractor from Canus or Tusla.
- All visitors must notify the site supervisor, or similar responsible party, of their presence daily. In other words, the notification requirement applies to ongoing projects where inspectors come back day after day.
- All visitors to PG&E job sites must review the site specific safety plan (or Job Safety Analysis) and confirm in writing that they have understood these requirements by signing the sign-in sheet.
- All visitors must follow the safety related direction of the onsite supervisor at all times, with no exceptions.

**What to do in cases of immediate safety threat:**

- Everyone has the right and obligation to “throw in the safety flag” in cases of imminent threat to safety. Anyone who believes that the situation is unsafe can direct for work to be stopped immediately until the safety concern is addressed.
- In a case where work was stopped for a safety reason, CPUC senior management must be notified immediately. Everyone should work with their direct supervisors to know how to contact SED Director or the next most senior person available.
- SED will inquire into all reported cases where work was stopped to address a safety concern. Evidence must be preserved and steps taken to document exactly what has occurred.

### **What to do in cases of concern with utility directions or procedure:**

- The inspectors must follow safety related directions from utility staff. In cases of immediate threat to safety, work should be stopped. In all other cases, inspectors should collect evidence and document their findings and address them later as appropriate.
- When appropriate, the inspectors should state their concern with procedure or activity to utility site supervisor or similar responsible party. When appropriate, notify utility of a possible violation if one potentially took place.
- The inspectors should note their concern in the appropriate audit or inspection report.
- Inspectors should work with their supervisors to communicate concerns up the management chain, as appropriate.
- If an inspector feels that a utility is using safety procedure to purposefully limit the ability of the inspector to perform an auditing function, the inspector must raise the concern to his supervisor or manager. In the field, the inspector must continue to follow safety related directions from the utility, even if the inspector believes them to be unreasonably restraining.

### **Procedure for utility in cases where visitors do not follow safety instructions:**

- The utility onsite supervisor, or similar responsible party, has the right to accompany visitors at all times if there is a reasonable concern regarding the ability of the individual to safely navigate the site and the ongoing construction activities.
- If a visitor does not follow utility safety related direction and/or performs actions that are deemed by the utility as unsafe, the utility may ask the individual to leave the job site.
  - In a case where a utility site supervisor, or similar responsible party, asks an inspector to leave a job site for a safety reason, the individual should leave the job site and immediately notify SED Director and Deputy Director or the next most senior person available. The utility must similarly immediately notify SED Director and Deputy Director or the next most senior person available.
- In a situation where an individual is not following utility safety related direction, including refusing to leave the site, utility may need to stop work until the safety situation is resolved.

- Utility should report all cases where a CPUC inspector or CPUC contractor failed to follow safety related directions. Utility should provide any supporting evidence possible, including related photographs or statements from witnesses.
- SED will inquire into all reported cases where an individual failed to follow utility safety procedure or directions.

If you have any questions with the job site safety policy outlined above, please contact me directly.

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***Elizaveta Malashenko***

Deputy Director

Office of Utility Safety and Reliability

Safety and Enforcement Division

California Public Utilities Commission

Phone: 415-703-2274

E-mail: [elizaveta.malashenko@cpuc.ca.gov](mailto:elizaveta.malashenko@cpuc.ca.gov)