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Replaces: Record Retention and Disposal, USP 4 (10/01/06)

Page 1 of 5

Objective: *To explain:*

- (1) *The responsibility for retaining records and*
- (2) *The disposal of records when they no longer are needed for legal or business purposes.*

Related Utility Policy:	<i>Records Policy, section (1)(b)</i>
Originator:	Vice President, Corporate Governance and Corporate Secretary
Business Risks Involved:	<p>Failing to keep records for periods required by law, regulation, or sound business practices may expose the utility to fines and civil or criminal prosecution and prevent the utility from defending itself or pursuing legal remedies to disputes.</p> <p>Keeping records beyond periods required by law, regulation, or sound business practices may burden the utility with unnecessary storage costs.</p>
Responsibility for Monitoring Compliance:	Each officer ensures that records in his or her organization are retained as required by law, regulation, or sound business practices and are disposed of properly at the end of appropriate retention periods. The Corporate Secretary Department administers the Record Retention Program, responds to questions, and provides consultation when requested.
Definitions:	<p>To erase electronic media is to remove or de-fragment recorded matter stored on hard disks, diskettes, magnetic tapes, etc., so that it cannot be recovered.</p> <p>Records include all memoranda, documents, correspondence, or other forms of tangible information storage (including photographs, microfilm, microfiche, video tapes, electronic media, sound recordings, etc.). Records include, but are not limited to, deeds, contracts, minute books, corporate seals, financial and accounting documents, and other documents relating to asset ownership,</p>



Major Steps:

a. How are record retention periods determined?

contractual obligations, or corporate governance.

Officers ensure that their organizations adhere to record retention periods set by relevant laws and regulations (see the *Federal and State Retention Guidelines* on the Record Retention Intranet web site). They may set longer retention periods than legally are required in order to meet administrative, operating, or claims-related needs. However, they should minimize such additional requirements to control storage costs.

b. Where are retention schedules kept?

The *Guide to Record Retention* is available from the Records Center and is on the [Record Retention Intranet web site](#).

Officers may add records to the *Guide to Record Retention* by forwarding a list to the Records Center for posting on the [Record Retention web site](#). The list must specify the exact title of the record, the form or report number (if applicable), and all essential retention period information.

Note: Retention periods in the *Guide to Record Retention* are valid only as of the date issued. Additional retention may be necessary to comply with new or changed legal or regulatory requirements effective after issuance of the *Guide*.

c. Who retains records?

Officers retain records under their care for the appropriate periods, ensuring that information is classified, labeled, and protected in accordance with appropriate utility standard practices and procedures. (Refer to the "See Also" section.) They retain active records locally and may send inactive records with long retention periods to the Records Center or another storage facility. For example, computer tapes may be sent to the Fairfield Information and Operations Center for long-term storage.

d. How do I send records to the Records Center?

See the *Shipping Records* procedures on the [Record Retention web site](#). The records transmittal form also is on the web site.

e. How do I retrieve records from the Records Center?

See the *Requesting Records* procedures on the Record Retention web site.

f. How do I send or retrieve records from other storage facilities?

Each storage facility supervisor establishes procedures for sending records to that specific storage facility and retrieving records from it.



g. What happens at the end of the retention period?

When records at the Records Center or other storage facility become eligible for disposal, the storage facility supervisor submits a list to the appropriate officer or director. He or she must confirm with the storage facility supervisor within 30 days of the date of the notice that the records should be destroyed. The officer or director also must specify the length of time and reason for any additional retention period.

Officers are responsible for establishing procedures to ensure that locally stored hard copy and electronic records are not retained beyond the appropriate retention periods.

h. How are records disposed of?

1) Hard copy records, including paper, microfilm, and photographs.

All records classified as "PG&E Confidential Information," "PG&E Privileged Information," or "Licensed Information" must be destroyed by shredding, witnessed by a utility representative. For example, customer information and contracts fall into the category of PG&E Confidential Information.¹

To the extent possible, records classified as "PG&E Public Information" or "PG&E Internal Use Information" should be recycled by a recycling firm.¹ Non-recyclable media may be discarded in the trash.

Duplicate records should be destroyed, recycled, or discarded, as appropriate, as soon as they have served their intended purpose and proper retention of the original document has been verified (e.g., receipt of the Records Transmittal from the Records Center or other storage facility).

To destroy records located in the General Office complex, contact the Facilities Management Office to create a work order to request a confidential shred bin.

2) Electronic records

"PG&E Confidential Information," "PG&E Privileged Information," and "Licensed Information" must be erased from electronic media in accordance with *Protection of Computer Resources and Electronic Information*, USP 9, and *Protecting Electronic Confidential Information*, issued by Information Systems Technology Services.

¹ Refer to *Classification and Legal Protection of Information*, USP 8, for guidance on the classification of utility information.



i. Are there special requirements for different types of records?

(Pressing the "delete" key does not erase information from electronic media.)

Electronic media that contains only "PG&E Public Information" or "PG&E Internal Use Information" may be overwritten or discarded in the trash, as appropriate.

Accounting records: Officers share retention responsibility with the Controller. Keep accounting records relating to additions or retirements from Federal Licensed Projects and the establishment of related amortization reserves until the Controller authorizes disposal.

Contracts: Send the original of every short-form and long-form contract to the Purchasing Department, Contract Scanning, N5D, San Francisco. These contracts are available electronically to authorized persons throughout the utility.

Environmental records: Document retention periods vary considerably. Before disposal, the responsible officer must ensure that all statutory and regulatory requirements for document retention have been satisfied. (When in doubt, consult with Environmental Services or the Law Department.)

Nuclear records: Follow regulatory requirements and the utility's nuclear policies and procedures.

Subsidiary company records: Retain these records separately from those of the utility and other companies, but in a manner comparable to similar utility files and records.

See Also:

1. Documents available through the Records Center:
 - *Federal and State Retention Guidelines* (also available on the [Record Retention web site](#))
 - *Guide to Record Retention* (also available on the [Record Retention web site](#))
 - Departmental index of records in storage
2. Utility Standard Practices:
 - *Classification and Legal Protection of Information*, USP 8
 - *Protection of Computer Resources and Electronic Information*, USP 9
 - *Service of Legal Papers*, USP 15



3. Record Retention Intranet web site (Under Work Resources, Internal Services, Records Retention)
4. Procedure:
 - Protecting Electronic Confidential Information (available on the Information Systems Technology Services Intranet web site under "Information Systems Security")

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