Corporation Procedure: GOV-2001P-01
Publication Date: 07/12/2010 Rev: 0

Guidance Document Development and Maintenance Procedure

Summary

This procedure describes how to write, review, approve, cancel, and communicate all guidance documents (policies, standards, procedures, and bulletins, unless documents are specifically exempted from this framework¹) issued by PG&E Corporation and its affiliates and subsidiaries, including Pacific Gas and Electric Company (together, PG&E).

Level of Use: Information Use

Target Audience

This procedure applies to anyone who writes and/or maintains PG&E guidance

documents.²

Safety NA

Before You Start Before writing a guidance document, first read and understand GOV-2001S.

"Guidance Documents Standard" and attend Guidance Document Author training or be working at the direction of someone who has completed the

training.

¹ This procedure does **not** apply to documents issued by the nuclear generation organization, which are structured to address **Nuclear** Regulatory Commission license requirements.

² Guidance documents produced by specific departments for limited audiences are not exempt. Authors of such documents also must follow the instructions provided in this procedure.



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Procedure Steps

1 Getting Started

- 1.1 Guidance documents typically are created or updated when processes or tasks need to be completed in a specific way, usually to ensure compliance, or to communicate to a broad audience "what-to-do" or "how-to-do-it" information.
- 1.2 In some cases, guidance documents are presented together in a manual or with other supporting documents. Such manuals are not considered "guidance documents" subject to this procedure, and may include job aids, numbered documents, forms, drawings, and/or specifications. While they are not considered "guidance documents", manuals may be numbered as noted in COV-20015-02, "Guidance Occument Numberical Fracedure."
- 1.3 Job aids, however, due to their widespread use across the enterprise, are subject to specific requirements as noted in the Definitions section of this procedure and <u>GOV-20018-05.13-ob-Aid Development Procedure.</u>
- 1.4 The process owner is the person who has the ultimate responsibility for a process and has the authority and ability to make necessary changes to that process.

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1.5 The process owner identifies the need for a guidance document and assigns the guidance document author (author). The process owner may or may not be the guidance document owner (owner) or guidance document approver (approver). (See Attachment 1 of GOV-2003S "Guidence Cocuments Standard," to determine the minimum approval level for each type of guidance document).

The Guidance Document Development Process Map, Appendix 1, provides a broad overview 1.6 of the process for writing, reviewing, approving, and issuing guidance documents.

2 Revisions

- 2.1 Minor Revisions: A minor revision generally is limited to administrative changes including changes to format, spelling, dates, references, code numbers, forms, department names, or document contact or document owner information.
 - The author and owner determine how much stakeholder involvement is needed for minor revisions.
 - 2. The original approver approves, or may delegate authority to approve, minor revisions.
 - 3. The author and owner determine if the minor revisions need to be communicated to other organizations within PG&E, and how that communication should take place.
- 2.2 Major Revisions: Any revision that is beyond the scope of a minor revision is considered to be a major revision. A major revision changes the intent, scope, or application of an existing guidance document, and usually involves new, modified, or deleted content. Major revisions include significant changes to content that affect safety, health, compliance, or reliability.
 - A guidance document undergoing a major revision must be updated as if it were a new guidance document, following the process steps detailed within this procedure.

3 Analysis

- The author first completes GOV-2001S-F01, "Goldance Document Analysis Form" 3.1 (GDA), with input as needed from any subject matter expert (SME) and/or the document owner, before starting to write the first draft of the guidance document. This will help the author adequately consider all aspects of the guidance writing process and the impact the document may have on the target audience and the company.
- 3.2 A GDA is not required when writing bulletins.
- 3.3 The author updates the GDA as needed throughout the writing process and circulates the GDA along with drafts of the guidance document during stakeholder reviews.

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4 Selecting a Guidance Document Type

4.1 The author chooses the type of document that best suits the content he or she wishes to provide. (Review the definitions of policy, standard, procedure, and bulletin provided in Attachment 1 of GOV-2001S, "Guidence Documents Standard!.)

NOTE

In some cases, it may seem easier to write a bulletin or a narrowly written, department-centric procedure just to "get something out there." Keep in mind, though, for tasks or processes that also occur in other areas of PG&E, it may be more efficient in the long run to write a single guidance document that addresses the needs of multiple organizations.

5 Initial Stakeholder Discussions

- 5.1 The author contacts potential stakeholders and key management personnel³ to discuss the following:
 - The proposed scope and content of the guidance document,
 - The target audience,
 - The reasons for writing the guidance document and what impact it may have,
 - Others who should be involved in the process (SMEs from substantially affected organizations), and
 - How the guidance document will be communicated and enforced.

To ensure consistency among policies, Compliance and Ethics is a key stakeholder during the development of any PG&E policy sponsored by an officer or officer governance forum.

5.2 The author finalizes the stakeholder group based on these discussions and updates the GDA accordingly.

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⁹ Key management personnel are supervisors, managers, directors, and/or officers whose organization or business functions will be substantially affected by the guidance document.

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6 Development

- 6.1 The author determines what level of management must approve the guidance document (see <u>Attachment 1 of GOV-2001S. "Guidance Documents Standard"</u>).
- 6.2 The author sends the GDA to the approver with a copy to key management personnel, as appropriate. This allows the approver and any key management personnel to intervene if necessary, e.g., when the proposed guidance document is too narrow in scope or if its implementation will be cost prohibitive.
- 6.3 After receiving the approver's authorization to proceed, the author circulates the GDA to the stakeholder group for comment.
- 6.4 The author then uses the approved template and guidance provided in <u>GCV-2901P-03. "Guidance Document Willing Style Procedure"</u> to write the first draft of the guidance document.

NOTE

Templates may not be modified or customized in any way.

- 6.5 The author uses <u>GOV-2001P-02</u>, <u>"Guidance Document Numbering Procedure"</u> to choose a unique number, not already in use, for the guidance document.
- 6.6 If needed, the author uses <u>GOV-2001S-802</u>, <u>'Guidance Document Tariboard Form</u>,'⁴ to write an employee communication describing the guidance document and its effect on the organization.
- 6.7 The author sends (or posts on a central SharePoint site) the draft guidance document, the updated GDA, and the draft Guidance Document Tailboard (if used), for stakeholder group review and comment. Comments may be captured using "track changes" features or other suitable means. To ensure the template macros are not corrupted through inexpert editing, the author may retain a "master" copy of the draft and enter only accepted edits on the master. Another alternative is to send or post only a .pdf format (Adobe) copy of the draft for review.
- 6.8 The author continues to refine the draft until a reasonable consensus among the stakeholders is achieved.

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⁴ Use of PG&E's Five Minute Meeting template is restricted to communications coordinated through Corporate Affairs.

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7 Stakeholder Responsibilities

- 7.1 Stakeholders are responsible for speaking on behalf of the interest(s) they represent. Members of the stakeholder group review the draft and supporting documents and comment whether:
 - The GDA is complete, thorough, and accurate, documents a thorough review of other documents to ensure consistency, and specifies reasonable controls to monitor compliance.
 - The draft guidance document is clear, concise, and provides meaningful, correct, and needed information to the target audience.
 - The draft Guidance Document Tailboard (if used) adequately explains the guidance document and reasonably anticipates questions that the target audience may have.
- 7.2 Members of the stakeholder group provide all comments to the author.

8 Key Management Review

- 8.1 The author works with the stakeholder group to ensure the final draft guidance document and supporting documents are reviewed with key management personnel.
- 8.2 The author considers all feedback and revises the guidance document as needed.

9 Final Approval

- 9.1 The author ensures the final guidance document and supporting documents are routed to the owner and approver for approval. Authors may use PG&E's electronic document routing system (EDRS) to route the documents.
- 9.2 If the guidance document is a policy, the following additional review procedures apply:
 - The author sends the policy to Compliance and Ethics (C&E) before final officer approval.
 - C&E reviews all policies and associated GDAs to ensure policies continue to conform
 to the template and other requirements of this standard. C&E completes this review
 within five business days of receipt of the policy and provides guidance to the guidance
 document author about the remaining steps necessary for approval.

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3. Upon approval by an officer or officer governance forum, the Chief Risk and Audit Officer, or his or her designee, communicates the policy to officers and their chiefs of staff. This is intended to inform the officer team of the new or revised policy and the interests that were represented during policy development. Officers are not responsible for formally reviewing and approving the policy details. If wider communication of the policy is needed, the approver then implements his or her communication plan to the wider audience.

10 Posting

10.1 The author ensures the final guidance document and the Guidance Document Tailboard (if used) are posted in Guidance Document Library on the PG&E Intranet within five business days of being approved (see GOM-2001P-00, 'Posting Guidance Documents Procedure) for instructions).

11 Publication Date

- 11.1 The effective date of the guidance document is the same date as the publication date unless otherwise stated in an accompanying Guidance Document Tailboard or GDA.
- 11.2 Once the guidance document is effective, the guidance document owner or his or her designee ensures the communication plan listed in the GDA is implemented and begins monitoring for compliance.

12 Maintenance

- 12.1 The document owner sets the review period for the guidance document. This review period must be at least once every five calendar years, not to exceed 63 months to the date the guidance document was last posted.
- All attachments and appendices referenced in the guidance document must be reviewed either before or at the same time as the scheduled review date of the guidance document itself. The guidance document approver is responsible for approving any changes to attachments and appendices associated with the guidance document.
- 12.3 If the guidance document is a bulletin, the document owner (or his or her designee) ensures the information is placed in its permanent location by the date specified on the bulletin.

13 Cancelling a Guidance Document

- 13.1 Before a guidance document is cancelled, the document owner, or his or her designee, identifies impacted documents and processes and notifies affected parties as needed.
- 13.2 The document owner, or his or her designee, ensures the guidance document is removed from the Guidance Document Library.

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- 13.3 If the guidance document is a policy and the sponsoring officer or officer governance forum determines that the policy is no longer needed, with the concurrence of the approving officer, the policy's author notifies appropriate stakeholders, including C&E, of the intent to cancel the policy. Absent any objections, the Chief Risk and Audit Officer, or his or her designee, communicates the policy cancellation to officers and their chiefs of staff.
- 13.4 The sponsoring officer and policy's author determine to what extent formal communication of the policy cancellation is needed, and work with the appropriate parties to develop any such communication.
- 13.5 C&E coordinates removal of the policy from the Guidance Document Library and ensures a copy of the canceled policy is retained.
- 14 When One Guidance Document Supersedes Another
- 14.1 The author may use EDRS to send a copy of the old superseded guidance document and a copy of the new guidance document to the approver. Once the approver approves the new document, the old one is effectively cancelled, except as described below.
- 14.2 A guidance document approved by one level of management cannot be cancelled by a lower level of management. For example, if an officer approved a standard, a director may not cancel it. The director may approve the new document, but the officer must authorize the cancellation of the prior document.

END of Instructions

Guidance Document Development and Maintenance Procedure

Definitions

Attachment: A separate document referred to in a guidance document that must be published in its native format, may be revised independent of the guidance document (for example, a job aid or form), may be shared by multiple documents, or may need to be stored separately for some other reason.

Appendix: Supplemental information that is included at the end of a guidance document, embedded within the same file. Typically, the information in an appendix is needed whenever the guidance document is used; the information usually does not change more frequently than the guidance document itself.

Form: A printed or typed document with blank spaces for insertion of required or requested information.

Guidance Document: A generic term for one of the four types of documents that provide instruction about specific subjects, processes, or work activities. The four types of guidance documents are "policies," "standards," "procedures," and "bulletins," each of which goes through a formal development and approval process.

Guidance Document Analysis: A form the guidance document author uses in the planning stages of writing a guidance document. The form is intended to ensure that the author carefully considers all aspects of writing and issuing the guidance document before beginning to write.

Guidance Document Tailboard: The approved document used to communicate a new or revised guidance document to a target audience.

Job aid: A device or tool (such as instruction card, memory jogger, wall chart, or pictorial representation) that provides quick access to information needed to perform a specific, single task. A job aid never is a "stand-alone" resource. It supports and is formally associated with a standard, procedure, or manual; it illustrates or elaborates on a step or set of steps within. It does not summarize, replace, or interpret a standard, procedure, or manual. Refer to GOV-2001Pg-05.136b-Aid Development Procedure. for more information.

Manual: A collection of guidance information and associated documentation packaged together, which includes a table of contents.

Numbered Document: Specific minimum construction or engineering instruction, practice, and/or best practice method required to meet regulatory requirements and Company policies. Numbered Documents refer to documents such as electric engineering construction documents and gas standards and specifications, but do not include engineering standards and design standards that are created and maintained by the Substation Engineering and Electric Transmission Line Engineering departments.

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Sponsoring Officer: The officer whose area of responsibility most closely aligns with a policy subject. He or she designates a policy author and shepherds the policy through the approval process and implementation.

Implementation Responsibilities

Process owners are responsible for ensuring guidance documents are written and maintained in accordance with this procedure.

Guidance document authors are responsible for writing guidance documents in accordance with this procedure.

Governing Document

GOV-01, "Guidance Occument Policy"

GOV-2001S, 'Guidence Decuments Standard'

Compliance Requirement/ Regulatory Commitment

NΑ

Reference Documents

Developmental References:

NΑ

Supplemental References:

GOV-2001F-02, "Guidance Document Numbering Procedure".

GOV-2001P-03, "Guidence Document Writing Style Procedure"

GOV-2001P-04, (Procedure Use and Adherence Procedure)

GOV 2001P-05. (Job Aid Development Procedure)

GOV 2001P-06, "Posting Guidanes Documents Procedure"

GOV-2001 S-F01, "Guidanca Document Analysia Form"

GOV-200 (S-F02, 'Guidance Document Taliboard Form'

Guidance Document templates and template instructions in the Author Tools

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Guidance:Docun	nent Development and Maintenance Procedure
	section of the Guidance Document Library
Appendix	Appendix 1: Guidance Document Development Process Map
Attachments	N A
Document Recision	NA
Approved By	Stephen Cairns, Vice President, Internal Audit & Compliance, PG&E Corporation
Document Owner	Megan Janis Director, Compliance and Ethics
Document Contacts	Manager, Compliance and Ethics Compliance Consultant, Compliance and Ethics
Revision Notes	
Where?	What Changed?
NA	This is a new document.



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APPENDIX 1: GUIDANCE DOCUMENT DEVELOPMENT PROCESS MAP

