

Contractor Safety Management



STANDARD	Effective Date	January 4, 2021		
	Supersedes	Contractor Safety Management Standard v7		
	Document ID <i>(For Admin Use Only)</i>	SCE-EHS-SAFETY-ST-2	Version <i>(For Admin Use Only)</i>	8

1.0 STANDARD STATEMENT

Southern California Edison (SCE) is committed to the safety and health of its employees, Contractors, and the public. The purpose of this standard is to establish SCE safety-related requirements for SCE personnel conducting company business with Contractors and Subcontractors. The goal of SCE's Contractor Safety Management program is to eliminate worker serious injuries and fatalities. As such, this standard sets the expectation that all stakeholders ensure tasks/activities with potential for serious injuries and fatalities are properly identified and mitigated.

1.1 Safety Performance Policy:

At its sole discretion, SCE can immediately suspend or terminate a contract and/or suspend or discontinue work of a Contractor/Subcontractor due to poor or noncompliant safety performance and/or failure to adhere to SCE's governing policies, procedures, and regulations.

2.0 APPLICABILITY

This standard applies to all SCE employees performing Contractor management functions, including Contractor qualification, monitoring, and evaluation. This standard establishes minimum Contractor safety requirements and clear responsibilities for SCE employees engaged in Contractor management. Employees supervising or directing Supplemental Workers who perform Contractor Management functions must ensure the Supplemental Workers adhere to the applicable provisions of this standard when performing work for the Company.

While the entirety of this standard applies to Safety Tier 1 contract work performed at SCE, only the following sections apply to Tier 2 contract work:

- a. Section 1.1 Safety Performance Policy
- b. Section 3.1.1 Tier Determinations
- c. Section 3.5 Procurement of Safety Tier 1 and Safety Tier 2 Contracts
- d. Section 3.6.2 Safety Tier 2 Contractor Orientation Requirements
- e. Section 3.10.1 Incident reporting
- f. Section 3.12 Recordkeeping, Item e
- g. Appendix A: Tier Classification

In addition to following this standard, you must follow the [Use of Company-Owned, Contract and Chartered Aircraft Policy](#) for all contracted, subcontracted, and chartered aircraft operations performed for SCE.

For this standard, the term "Contractor" is used to denote both Prime Contractors (Contractor who has a contract with SCE for a scope of work/project and has the full responsibility for its completion) and Subcontractors (Contractor who has a contract with the Prime Contractor to perform a portion of the work/project) unless otherwise stated.

The entirety of this Contractor Safety Standard will become effective January 4, 2021 with the exception of the following:

- a. All approved HASP and CHOC documents from 2020 must be updated by March 31, 2021 using the revised forms which will become available January 4, 2021
- b. The Safety Professional Requirement for Safety Tier 1 HR Contractors becomes effective March 31, 2021
- c. Automated External Defibrillator (AEDs) Requirement for work in proximity to high voltage lines or facilities becomes effective July 1, 2021
- d. Leader Safety Culture Training Requirement becomes effective on Dec. 1, 2021

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3.0 STANDARD DETAIL

3.1 Safety Qualification Requirements for Safety Tier 1 Contractors

3.1.1 Tier Determination

Compliance with this standard requires differentiating between contracted work that is classified as Safety Tier 1 or Safety Tier 2. SCE classifies as Safety Tier 1 work activities that, without the implementation of appropriate safety measures, are potentially hazardous or life-threatening. SCE classifies as Tier 2 work as routine contractual work that is not typically considered hazardous. Distinguishing between the categories does not mean that Tier 2 contracted work is risk-free, but only that the scope of work is lower risk. For the purposes of this standard, Contractors conducting any Safety Tier 1 work will be referred to as Safety Tier 1 Contractors. Contractors conducting only Safety Tier 2 work will be referred to as Safety Tier 2 Contractors.

The Edison Representative determines the tier level of work to be contracted using [Appendix A: Safety Tier Classification Guide](#) and must include the tier on the initial communication or purchase requisition that is submitted to Supply Management. The Edison Representative can contact Edison Safety for additional guidance on appropriate tier classification as needed.

3.1.2 Third Party Administrator (TPA) Safety Tier 1 Contractor Performance, Program Review, and Monitoring

SCE retains a Third-Party Administrator (TPA) to conduct safety review and qualification of all Safety Tier 1 Contractors prior to their conducting Safety Tier 1 work for SCE. ISNetworld (ISN) currently serves as SCE's TPA.

3.1.2.1 TPA Registration and Information Submittal

The Edison Representative or Delegate must ensure Safety Tier 1 Contractors establish an account with SCE's TPA and furnish all necessary information to meet safety qualification requirements prior to conducting Safety Tier 1 work. All Contractors (with the exception of governmental agencies) receiving purchase orders for Safety Tier 1 work must have undergone TPA review and qualification regardless of whether the Safety Tier 1 work is conducted themselves or by Safety Tier 1 Subcontractors. All Edison Representatives and Delegates for Safety Tier 1 Contractors must register with ISN to gain access to the TPA system.

3.1.2.2 TPA Safety Tier 1 Safety Performance and Programs Review

The TPA reviews and scores Safety Tier 1 Contractors on safety performance, programs, and culture. The actual grading criteria details can be found within the TPA system. SCE has designed the TPA grading criteria to emphasize the elimination of all serious injuries and fatalities. Any Contractor who experienced a fatality within the last three years automatically receives a TPA grade of C and must have an SCE-approved [Conditional Contractor Plan](#) to reach Conditional Status (as outlined in section 3.1.2.7 below). Details on the three major areas included in the TPA review:

- a. **Safety Performance** data include, but are not limited to: Total Recordable Incident Rate; Days Away, Restricted, and Transferred (DART) Rate; Experience Modification Rate (EMR); fatality history; Actual Life Threatening/Life Altering Incidents on SCE property, Occupational Safety and Health Administration (OSHA) repeat citation history; and serious public incidents
- b. **Programs** are reviewed against all applicable local, state, and federal regulations with which Contractors are required to comply, including but not limited to California and federal OSHA regulations. Safety Tier 1 Contractors may request an exemption from submission and TPA review of a safety program covering work which they or their subcontractors do not conduct for SCE. The

requests will be reviewed and approved by the Edison Representative and Edison Safety

- c. **Safety Culture** practices are assessed by the TPA and include activities such as: holding regular employee safety team meetings, close-call reporting, and incident evaluation policies

3.1.2.3 TPA Scoring and Classification

The TPA review results in a grade of A, B, C (including C-SCE Review Required), or F for the Contractor. After the initial review and during the ongoing monitoring of Safety Tier 1 safety performance and programs, the Contractor is classified into one of three categories:

- a. **Qualified Contractors** have an A or B grade because they meet or exceed SCE-established standards for safety performance and programs. They are approved to perform Safety Tier 1 work at SCE
- b. **Conditional Contractors** are Contractors with a grade of C that have an SCE-approved [Conditional Contractor Plan](#) (Refer to Section 3.1.2.7 for details). These Contractors' historic safety performance may be below SCE and/or industry standard and may have scored low in safety culture, but they are qualified to perform work at SCE under the condition that additional mitigation procedures contained in a Conditional Contractor Plan are in place to correct previously identified deficiencies
- c. **Unqualified Contractors** have an F grade as they do not meet SCE and/or industry standards for safety programs and/or safety performance. Contractors having C grades are also classified as Unqualified Contractors if they do not have SCE-approved Conditional Contractor Plans. Unqualified Contractors cannot perform any Safety Tier 1 work for SCE

3.1.2.4 TPA Monitoring and Grade Changes

The TPA monitors the safety performance data of Safety Tier 1 Contractors and periodically revalidates their safety programs to track changes in their TPA grades and classification status. Changes in TPA grades and classification status must be monitored by Contractors and Edison Representatives. The Edison Representative must work with the Contractor to respond to grade changes and ensure the Contractor achieves Qualified status or Conditional status with an approved [Conditional Contractor Plan](#) within the following time frames:

- a. If the TPA grade of a Qualified Contractor changes to a C or an F due to expired programs, expired program exemption requests, or non-submission of performance data such as EMR, the Contractor must submit necessary items to TPA for review and achieve Qualified status as soon as possible but no later than 30 calendar days of the grade change
- b. Contractors whose grade changes to C due to changes in safety performance or safety culture must prepare a Conditional Contractor Plan. The plan should be submitted to SCE within 15 calendar days of the grade change. The Edison representative will review the plan and obtain approval as soon as possible but no later than 30 calendar days of the grade change
- c. Conditional Contractors whose Conditional Contractor Plans have expired must obtain approval of a revised Conditional Contractor Plan as soon as possible but no later than 30 calendar days of the expiration date

In some instances, OUs can request additional time beyond 30 calendar days to obtain approval of a Conditional Contractor Plan should more time be needed to ensure the Contractor develops a robust plan. The Edison Representative must review and obtain approval of the plan as soon as possible, but no later than 30 calendar days after the grade change. It is recommended that a draft version of the Conditional Contractor Plan be submitted to the Edison Representative within 15 calendar days of a grade change. If more than 30 days is required to get a final Conditional Contractor Plan signed by the Directors, before the deadline, the Edison Representative/OU can request additional time for review and revision of the plan by submitting the Conditional Contractor Extension Request Form to

Edison Safety. The request must be reviewed for approval by the OU Director and the Director of Edison Safety. Contractors not achieving Qualified status or Conditional status with an approved Conditional Contractor Plan within 30 calendar days of status change cannot conduct Safety Tier 1 work unless an extension has been granted.

3.1.2.5 Grade Adjustment Process

Contractor TPA grades/scores may be adjusted by Edison Safety based on the conditions described below. Grade adjustments may be requested by Edison Safety, Edison Representatives, or Contractors using the Contractor Safety Points Request Form. Any grade adjustment must be approved by the Director of Edison Safety. For incidents involving Subcontractors, grades of Prime Contractors may also be impacted.

Grades may be lowered as a result of:

- a. Fatalities or Serious Willful or Repeat OSHA citations in the last three years
- b. Recent Actual or Potential Life Threatening or Life Altering (LT/LA) Incidents and High Energy Significant Injury or Fatality (HSIF), Low Energy Significant Injury or Fatality (LSIF), Potential Significant Injury or Fatality (PSIF) incidents
- c. Supply Management control stage or corrective action plans
- d. Multiple at-risk observations occurring while working for SCE
- e. Inadequate subcontractor oversight and management
- f. Failure to address safety issues/requirements once identified
- g. Other safety issues as determined by SCE

Grades may be raised for:

- a. Contractors with work hours under 50,000 per year whose grades have been negatively impacted by minor injuries (note: no points can be added to a Contractor grade if the Contractor averages over 50,000 work hours in the last three years or has had any fatalities/actual life threatening/life altering incidents in the last three years)
- b. Contractors demonstrating exemplary safety leadership as determined by Edison Safety and Supply Management
- c. Incidents involving a fatality that occurred through no fault of the contractor (e.g., third-party vehicle accident)
- d. Other circumstances evaluated by SCE on a case-by-case basis

3.1.2.6 Expedited Safety Review

The [Expedited Safety Review](#) is used when Safety Tier 1 Contractors are needed for emergency purposes, such as an asset failure or natural disasters. In these cases, SCE may use the Expedited Safety Review process for qualifying the Contractor. This will occur in parallel with the normal process of the TPA's review of the Contractor. This process will not be used to circumvent or replace existing processes or for scopes of work other than for an emergency condition that requires expedited onboarding. The OU Director, in collaboration with the Edison Representative and Edison Safety, shall initiate contact with Supply Management to invoke the Expedited Safety Review procedure using the Expedited Safety Review Checklist. Once the OU VP/SVP has approved the Expedited Safety Review Checklist, it is to be routed to the VP over Edison Safety for consideration.

No review is necessary should a catastrophic or significant incident occur that requires mutual aid and the emergency sharing of resources across service territory boundaries.

3.1.2.7 Conditional Contractor Requirements

When a Safety Tier 1 Contractor receives a TPA C grade, the Contractor, in collaboration with the Edison Representative, must develop a safety improvement plan using the [Conditional Contractor Plan Form](#). The Conditional Contractor Plan must be submitted to Edison Safety for initial review. Once reviewed, the Edison Representative must request

approval from the Operating Unit (OU) Director. Upon OU Director approval, the Edison Representative must submit the plan to the Edison Safety Director for review and approval.

Prime Contractors are responsible for ensuring their Subcontractors who have a TPA C grade develop a Conditional Contractor Plan. Prime Contractors shall work with the Edison Representative to obtain the approval of the plan by the OU Director and Director of Edison Safety prior to the Subcontractor with a TPA C grade performing Safety Tier 1 work.

Conditional Contractors conducting Safety Tier 1 work for more than one OU are required to have Conditional Contractor Plans approved for each line of work enabling each OU Director to approve the contractor for use in their organizational unit. Approved Conditional Contractor Plans are good for up to one calendar year. Prior to expiration, the Edison Representative must ensure that the Contractor has updated their previously approved Conditional Contractor Plan prior to requesting an approval extension.

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Edison Representatives or Delegates must ensure Conditional Contractors:

- a. Conduct at least two field safety observations per month of each crew conducting work for SCE
- b. Submit quarterly reports to SCE by the 15th of the month after the end of a quarter using the [Conditional Contractor Quarterly Report Form](#)

Edison Representatives or Delegates must review the Conditional Contractor Quarterly Report form to assess whether the Contractor has met its Conditional Contractor Plan requirements and follow up with the Contractor as needed.

3.2 Subcontractor Management Responsibilities

Prime Contractors are responsible for their Subcontractors' work and safety performance at all times when carrying out work for SCE, including ensuring the completion of Safety Prequalification, Safety Orientation, safety observations, incident reporting, and cause evaluations. These requirements are included in the Contractor Handbook & Orientation Checklist (CHOC). During Contractor Orientation, the Contractor Representative must use the CHOC to confirm these requirements have been met and the Edison Representative must review the CHOC to verify compliance with these requirements before work begins.

3.2.1 Safety Prequalification by TPA

Safety Tier 1 Subcontractors must undergo the same qualification process as Safety Tier 1 Prime Contractors (refer to Section 3.1 for details) and achieve Qualified Contractor status or Conditional Contractor status before conducting Safety Tier 1 work, regardless of the work duration. Edison Representatives must ensure:

- a. Safety Tier 1 Prime Contractors notify and receive approval from the Edison Representative of their intention to use Safety Tier 1 Subcontractors before commencement of Tier 1 work by a Subcontractor. (Refer to Section 3.2.1 for details). Failure to notify the Edison Representative of the use of a Subcontractor constitutes a material breach of contract by the Prime Contractor
- b. Safety Tier 1 Prime Contractors use only Qualified or approved Conditional Subcontractors to conduct Safety Tier 1 work
- c. Safety Tier 1 Prime Contractors register their use of Tier 1 Subcontractors in the TPA system (currently ISN SubTracker)
- d. Safety Tier 1 Prime Contractors monitor Subcontractor ISN grades to ensure Subcontractors maintain Qualified status or Conditional Status with an approved Conditional Contractor Plan
- e. Edison Representatives must also monitor Subcontractor ISN grades and disqualify a Subcontractor with an unacceptable grade and where the sponsoring Contractor has failed to take the required follow up actions
- f. Safety Tier 1 Prime Contractors maintain up-to-date Hazard Assessment and Safety Plan (HASP) and Contractor Handbook & Orientation Checklist (CHOC) to accurately reflect the list of current subcontractors. The updated document must be uploaded into the TPA system

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- g. Safety Tier 1 Prime Contractors update the Worker and Subcontractor Orientation sections of the HASP & CHOC and ensure the proposed steps include the requirements specified by SCE and those each company employs to ensure they are training and qualifying their workforce
- h. Safety Tier 1 Prime Contractors develop procedures for conducting observations and managing the performance of their subcontractors, including incident management.
- i. Safety Tier 1 Prime Contractors use only approved Subcontractors technically qualified by SCE Aircraft Operations consistent with the Use of Company Owned, Contract and Chartered Aircraft Policy for aircraft operations performed for SCE.

3.2.2 Prime Contractor Safety Review of Subcontractors

In addition to ensuring Safety Tier 1 Subcontractors achieve qualified status in the TPA grading, Prime Contractors must conduct their own safety review of Subcontractors. The review must include a review of hazards associated with the work to be performed and of the Subcontractor's mitigation measures to address those hazards.

3.2.3 Safety Orientation

Prime Contractors must conduct a Contractor Safety Orientation for all Subcontractors prior to the start of work. Refer to Section 3.6 for details.

3.2.4 Safety Observations

Safety Tier 1 Prime Contractors must conduct monthly field observations for each of their Subcontractor crews while actively conducting SCE work on their behalf. Refer to Section 3.4.4 for additional details on this requirement.

3.2.5 Incident Reporting and Cause Evaluation

Prime Contractors must ensure all Subcontractor safety incidents are reported and evaluated as specified in the HS Handbook for Contractors, including all injuries (including low-level incidents such as sprains and strains and those that require first aid), crew-caused circuit interruptions, close calls, and property damage incidents.

3.2.6 Prime Contractor TPA Grade Impacts for Subcontractor Performance

Prime Contractors will have their TPA grades/scores lowered as a result of Subcontractor incidents where the Prime Contractor has not adequately fulfilled the requirements above.

3.3 Safety Tier 1 Higher-Risk (HR) Contractors

3.3.1 Safety Tier 1 Higher-Risk (HR) Contractors are those Contractors who perform work for SCE that are subject to serious injuries or fatalities if behaviors and/or work practices deviate from established safety protocols and best practices. Safety Tier 1 HR Contractors are those who performing work types that have historically experienced a higher volume and severity of incidents on SCE property. Safety Tier 1 HR Contractors include any Contractor directly involved with the following SCE scopes of work:

- a. High Voltage Electric Transmission and Distribution work, including civil and electrical scopes of work
- b. Substation Construction and Maintenance work
- c. Vegetation Management operations including Line Clearance Tree Trimming, Hazard Tree Removal, and other similar scopes of work
- d. All Aircraft Operations Including Helicopter Operations
- e. General Contractor, owner engineer, and EPC-type contractors involved with the management/oversight of Safety Tier 1 HR contractors

3.3.2 Procurement of Safety Tier 1 HR Contracts Only

Edison Representatives and Supply Management must coordinate with Edison Safety for the lifecycle of the procurement process, including the development of the request for proposal (RFP), project specifications, job aids, and scoring criteria. Edison Safety must support the request by providing

information and feedback to support the procurement process, including providing guidance for safety requirements, supporting job walks, evaluating and scoring bidder responses, and supporting the selection process.

3.3.3 Critical Observable Actions Requirement

For Safety Tier 1 HR Contractors, SCE and our Contractors partnered together to identify Critical Observable Actions (COAs) in an effort to reduce serious injuries and fatalities. COAs are defined as those observable mitigation measures that protect against primary hazards that can lead to serious injuries and fatalities. COAs have been identified for the following work scopes: Vegetation Management, Bulk Transmission, Distribution Electrical, Substation Construction, and Underground Civil. COAs will continue to be developed over time. SCE has integrated COAs into Safety Tier 1 HR HASP template documents as base-level mitigation in an effort to eliminate serious injuries and fatalities. Contractors are required to accept these COAs and train their workforce to these expectations. This requirement is included in the Contractor Handbook & Orientation Checklist (CHOC). During Contractor Orientation, the Contractor Representative shall use the CHOC to confirm these requirements have been met, and the Edison Representative shall review to CHOC with the Contractor Representative to verify compliance with these requirements, prior to the start of work.

3.3.4 Automated External Defibrillators (AEDs) Requirement

Safety Tier 1 HR Contractors working on or near energized high-voltage lines or equipment (e.g., Vegetation Management Contractors conducting Line Clearance work) shall require each crew to have an automated external defibrillator (AED) onsite by July 1, 2021 when conducting work on or near energized high-voltage electrical equipment. Safety Tier 1 HR Contractors must train their employees working on or near energized high-voltage lines or equipment on AED use. This requirement is included in the Contractor Handbook & Orientation Checklist (CHOC). During Contractor Orientation, the Contractor Representative must use the CHOC to confirm this requirement has been met, and the Edison Representative must review to CHOC with the Contractor Representative to verify compliance with this requirements, prior to the start of work.

3.3.5 Safety Professional Requirement

For Safety Tier 1 HR Contractors, a minimum of one dedicated Safety Professional per 30 employees (including prime and sub-contractor personnel) shall be available and actively supporting operations as specified below in Section 3.4.2. This requirement is included in the Contractor Handbook & Orientation Checklist (CHOC). During Contractor Orientation, the Contractor Representative shall use the CHOC to confirm this requirement has been met, and the Edison Representative shall review to CHOC with the Contractor Representative to verify compliance with this requirements, prior to the start of work.

3.3.6 Safety Observation Requirements

Safety Tier 1 HR Contractors shall conduct and document a minimum of two observations per crew each month (including prime and subcontractor employees) as specified below in Section 3.4.4.

3.4 General Contractor Requirements

Below are general requirements for SCE Contractors. These requirements are included in the Contractor Handbook & Orientation Checklist (CHOC). During Contractor Orientation, the Contractor Representative shall use the CHOC to confirm these requirements have been met, and the Edison Representative must review to CHOC with the Contractor Representative to verify compliance with these requirements, prior to the start of work.

3.4.1 Onsite Supervisor Requirement

Safety Tier 1 Contractors must provide a supervisor/person in charge who is responsible for the general work area for Safety Tier 1 work at any jobsite involving more than one worker. This person must ensure:

- a. Rules/policies pertaining to the job are followed
- b. Safe work practices are utilized

- c. Risks and hazards associated with the job are identified, discussed, and mitigated prior to commencing work

While the supervisor/person in charge is expected to identify and correct any unsafe work practices or other performance deficiencies which may occur, Contractor employees are not required to be in the line of sight of supervisors at all times. During Field Safety Observations, the Edison Representative must verify compliance with this requirement.

3.4.2 Safety Professional Requirement

Safety Professionals are a required for Safety Tier 1 Contractors when working on SCE property:

- a. For Safety Tier 1 Contractors, a minimum of one dedicated Safety Professional per 50 employees (including prime and sub-contractor personnel) shall be available and actively supporting operations
- b. For Safety Tier 1 HR Contractors, a minimum of one dedicated Safety Professional per 30 employees (including prime and sub-contractor personnel) must be available and actively supporting operations

SCE may require additional Safety Professionals should the size, geographic location, and complexity of the work warrant additional support. Edison and Contractor Representatives must align on the required Safety Professionals that will be provided by the Safety Tier 1 Contractor before work begins, throughout the contract period, during extended work hours, and any time additional personnel are added to the workforce to support SCE's operational needs.

Safety Professionals must have the following experience:

- a. A minimum of five years' experience supporting or leading safety programs
- b. A minimum of two years' experience in the industry they are responsible for overseeing
- c. It is preferred that at least one Safety Professional have qualifications and credentials that directly relate to the work they are supporting (e.g., Safety Professionals supporting Vegetation Management operations should have safety certification for Vegetation Management)

Safety Professionals must provide dedicated safety support for the work awarded within the contract scope. Expectations for Safety Professionals include:

- a. The management of work practices and procedures that directly support the elimination of Serious Injuries and Fatalities
- b. Coordination of efforts to ensure compliance with all applicable rules and procedures
- c. Coordinating the execution of SCE's Handbook for Contractor expectations with a focus on:
 - a. Orientation for all employee and subcontractors on commitments made in the executed HASP and CHOC in addition to all other company policies and procedures put in place to validate employee capabilities, training, and onboarding
 - b. Coordinating and conducting field safety observations and subsequent corrective actions
 - c. Managing opportunities to improve work practices and procedures
 - d. Incident management and reporting requirements

3.4.3 New Employee Supervision and Training Requirement

Contractors must have a plan to train and provide additional supervisory oversight for newly hired workers conducting Safety Tier 1 work during their first six months of employment and for workers during the first six months following assignment to a new role (e.g., newly promoted lineman, supervisor, etc.). This plan must include an orientation training and periodic ongoing formal training in relevant topics for all employees.

3.4.4 Safety Observation Program Requirement

All Safety Tier 1 Contractors working for SCE must maintain a Safety Observation Program. Safety Tier 1 Contractors must implement this program by July 1, 2021. This includes Safety Tier 1 Contractors who worked less than 25,000 hours per year for SCE who previously were not required to have a Safety Observation Program.

The program must be designed for the Contractor to conduct regular field observations of their employees and Subcontractors conducting SCE work. Contractors must develop and implement processes for their leadership to review their observation data and address adverse conditions/observation trends. The program must include the ability to electronically track and trend observation data. These data must be maintained and made available in electronic format to SCE upon request, including: the number of observers and observations, observation details, corrective actions taken, top safe behaviors, and top at-risk behaviors.

Safety observation frequency:

- a. Safety Tier 1 Contractors must conduct and document a minimum of one observation per crew each month (including prime and subcontractor employees)
- b. Safety Tier 1 HR Contractors shall conduct and document a minimum of two observations per crew each month (including prime and subcontractor employees)

Prime Contractors must enter observation data into ISN's Site Tracker module as detailed in Section 3.10.3.

3.4.5 Tailboard Requirement

Before work begins each day, Contractors must conduct a Tailboard meeting. A Tailboard means a Tailboard conference, pre-job briefing, tailgate meeting, job procedure discussion, or talking the job over before beginning work to ensure all supervisors and members of each crew involved thoroughly understand the job to be performed and the method of accomplishing it in a safe manner. Before the start of each job, after lunch, and after other breaks, and in the event the scope of the job changes, every crew leader must ensure all involved personnel come together and outline the proper work procedure to be followed in such a manner that each Contractor employee understands:

- a. Detailed work plan
- b. Critical steps of the job
- c. Their role and responsibilities
- d. Other employees' roles and responsibilities
- e. Hazards and associated mitigation measures to complete the work safely, including specific identification of any task/activity that has potential for a serious injury or fatality
- f. Required personal protective equipment
- g. Emergency action plan
- h. Their responsibility to Stop Work should conditions become unsafe

At worksites with more than one worker, the Tailboard discussion shall be documented in a written Tailboard form that is signed by all workers onsite and posted at the work location. Visitors, before entering the work site, and new workers, prior to the start of their work, shall be briefed by Contractors on the content of the Tailboard to make them aware of the hazards and mitigations associated with the work. Edison Representatives or Delegates shall verify the Tailboard Requirement is met during Field Safety Observations (Refer to Section 3.4.4 for details).

A signed copy of the HASP and CHOC must be available with the tailboard at the worksite for crew and/or visitor to review upon request. HASP and CHOC hard copies or electronic versions are acceptable as long as the crew or visitors can easily reference these documents.

3.4.6 Leader Safety Culture Training Requirement

All Safety Tier 1 Contractors who have worked or plan to work at least 25,000 hours/year for SCE must implement a Leader Safety Culture Training course for all of its leaders (including management, foremen, and supervisors) overseeing employees conducting Safety Tier 1 work for SCE by Dec. 1,

2021. Existing leaders must be trained by Dec. 1, 2021, and training plans to train new leadership shall be implemented by this date. New leaders shall be trained within six months of being placed in a leader role. Topics that should be included in the training are:

- a. The role of a leader in building and sustaining a strong safety culture
 - a. Leveraging leader influence
 - b. Internal leadership frame and impact on team dynamics
- b. Personal safety ownership – Understand personal motivation for investing in safe work practices (what are we staying safe for rather than from), how to develop an attitude and mindset to take control of personal safety, and the importance of connecting personal safety value with personal why for leadership
- c. Personal cognitive techniques to assess and manage risk — establish a connection between personal cognitive tools and existing tools/work practices (e.g., Human Performance)
- d. Techniques to improve communication with peers and colleagues
- e. The importance of speaking up
- f. Understand sphere of influence and control
- g. Learning over blame — How to evaluate incidents with a focus on learning (not blame) and how to implement programmatic and systematic improvements to reduce the risk of the same event recurring
- h. Leadership tools to align attitudes, behaviors, and results, including safety observations, recognition, modeling, and coaching

3.4.7 Stop Work Responsibility Requirement

Contractors must ensure all employees and Subcontractor personnel are trained and fully understand that they have a responsibility to immediately stop work any time unsafe conditions or behaviors are observed until the job can be completed safely.

3.4.8 Fitness for Duty Requirement

Contractors must have a Fitness for Duty (FFD) policy and ensure employees are trained on FFD policies. The policy shall include FFD testing following all incidents involving SIFs, an injury to a third party, significant loss of power to customers, or significant property damage.

3.5 Procurement of Safety Tier 1 and Safety Tier 2 Contracts

3.5.1 SCE Contractor Handbook and Orientation Checklist (CHOC)

For all Safety Tier 1 and Tier 2 contracts, the Edison Representative must initiate the Contractor Handbook and Orientation Checklist (CHOC) as part of the request for proposal (RFP) and provide the most current version of the SCE Handbook for Contractors. Bidders are required to review the Handbook for Contractors and execute the CHOC as evidence confirming that they understand SCE's expectations during the procurement process. Additionally, bidders are required to fully outline their planned approach to orientation, training, and management of their employees and subcontractors to ensure they have proper orientation and understand the expectations while working on SCE property.

Upon award of a contract, the successful bidder must participate in a Contractor Orientation and review the HS Handbook for Contractors with the Edison Representative completing the execution of the CHOC (Refer to Section 3.5.1 for details). The orientation and CHOC review provide opportunities for questions and dialogue regarding expectations of Contractors performing work for SCE. The Edison Representative or Delegate must ensure the SCE CHOC is signed by the Prime Contractor Representative as well as Subcontractor Representatives. The Edison Representative must sign the Checklist after conducting Contractor Orientation. Safety Tier 1 contractors are required to upload the fully executed CHOC into their TPA account.

3.5.2 SCE Contractor Hazard Assessment and Safety Plan (HASP)

For all scopes of Safety Tier 1 work, including Source Contracts, the Edison Representative must initiate the HASP by completing step 1 of the instructions and ensuring that it is provided in the request for proposal (RFP) so the hazards associated with the work and applicable SCE plans and

programs are clear to bidders. The initiation of the HASP and execution of step 1 identifies the scope of work, applicable SCE plans and programs, and known hazards, and, in some cases, it will list prepopulated Critical Observable Actions (COAs). All bidders must review the HASP, confirm the hazards, and populate the mitigation measures for SCE's review per the plan instructions. The HASP also has other key elements such as a list of key personnel, safety roles and responsibilities, proposed subcontractors, employee and subcontractor management procedures, tailboard protocols, and PPE requirements, among other critical elements essential to the safe execution of the work. The HASP must be completely filled out by the bidders for SCE's review and consideration in the bidding process.

Upon award of work, successful Prime Contractors must update the HASP as needed and submit it to the Edison Representative for review. The Contractor Representative and Edison Representative must both sign the HASP once both representatives are fully aligned on the content of the plan. The Contractor Representative and Edison Representative must review the HASP and update (and re-sign) the plan annually or as needed. Examples of changes that require updates to the plan include:

- a. Introducing new work activities
- b. Introduction of new hazards
- c. Changes to mitigation measures
- d. Change in key personnel
- e. Change in subcontractors
- f. Addition of major plans and programs
- g. Other critical changes as determined by SCE

For Source Prime Contractors, a single HASP may be used for multiple regions/purchase orders if:

- a. The plan applies to the work scope being performed
- b. Associated hazards/mitigations are the same
- c. Key personnel remain consistent

OU must perform ongoing, periodic reviews of HASPs for their Safety Tier 1 contracted work to ensure the documents are updated and annual reviews have taken place.

If any elements of the HASP change, updates must be made by the Prime Contractor, reviewed, and signed by both the Prime Contractor Representative and Edison Representative. The Prime Contractor must then upload the updated SCE Contractor HASP into the TPA system within 10 business days.

3.5.3 Critical Observable Actions (COA) HASP Templates

For Safety Tier 1 HR Contractors, Edison Safety has prepared HASP documents with Critical Observable Actions embedded into the mitigation measures as base-level mitigation expectations while working on SCE property. Edison Representatives must ensure these templates are used for all Safety Tier 1 HR contracts.

3.6 Safety Tier 1 and Safety Tier 2 Contractor Orientation Requirements

3.6.1 Safety Tier 1 Orientation

Before Safety Tier 1 Prime Contractor's start of work, the Edison Representative or Delegate must ensure a Contractor Orientation is performed in collaboration with the Prime Contractor by ensuring the full execution of the most recent version of the following:

- a. SCE Contractor Hazard Assessment and Safety Plan
- b. SCE Contractor Handbook and Orientation Checklist

For each scope of work or source contract, an Orientation must be conducted. Prime Contractor Representatives and the Edison Representative must work together to ensure these documents are completed and signed by the Edison Representative, the Prime Contractor Representative, and all Subcontractor Representatives before work begins.

The Prime Contractor Representative must conduct a Contractor Orientation for their crews, including Subcontractors (including Safety Tier 2 Subcontractors), as well as any new employees/Subcontractors that begin work on the project after the original Contractor Orientation. A signed copy of the SCE Contractor Hazard Assessment and Safety Plan and the SCE Contractor Handbook and Orientation Checklist shall be available upon request and retained by all crews while conducting Safety Tier 1 work for SCE. Additionally, for each scope of work, the Edison Representative shall ensure the Prime Contractor Representative uploads copies of the completed/signed SCE Contractor Hazard Assessment and Safety Plan and the SCE Contractor Handbook and Orientation Checklist into the TPA system within 10 business days of the Contractor Orientation.

3.6.2 Safety Tier 2 Orientation

Before a Safety Tier 2 Prime Contractor begins work, the Edison Representative or Delegate must ensure a Contractor Orientation is performed in collaboration with the Prime Contractor by ensuring the development/review of the following:

- a. SCE Contractor Handbook and Orientation Checklist

Prime Contractor Representatives and Edison Representative must work together to ensure this document is completed and signed by the Edison Representative, the Prime Contractor Representative, and all Subcontractor Representatives prior to the start of work. The Prime Contractor Representative must conduct a Contractor Orientation for their crews, including Subcontractors, as well as any new employees/Subcontractors that begin work on the project after the original Contractor Orientation. The Prime Contractor must maintain a signed copy of the SCE Contractor Handbook and Orientation Checklist at the Contractor's office or job site.

3.7 Field Monitoring

3.7.1 Field Safety Observations

The Edison Representative or Delegate must perform Field Safety Observations for Safety Tier 1 Contractors to confirm that work is carried out in a safe manner. The SCE HASP and CHOC must be referenced to review the risks and hazards associated with the work and guide appropriate safety behaviors based on work being performed and to develop an understanding of the contract agreements. Delegates conducting observations may be SCE employees or Supplemental Workers. The Edison Representative must review the [HASP](#) and [CHOC](#) with Delegate so that the Delegate is knowledgeable of the Contractor's work scope and hazards/mitigation measures associated with the work. The Edison Representative or Delegate performing the observation must document their findings in the SCE Safety Observation Tool within five (5) business days of completion.

3.7.1.1 Frequency

The Edison Representative must ensure Field Safety Observations are completed at least once per month for all active Qualified Safety Tier 1 Contractors per scope of work. Observations must be performed at least twice per month for Safety Tier 1 HR Contractors, for Conditional Contractors, or when one or more of the following high-risk criteria are present:

- a. When a Contractor is new to SCE or is performing a type of work at SCE for the first time
- b. After an Actual or Potential Life Threatening/Life Altering incident
- c. After a regulatory visit that resulted in a safety violation

The twice monthly Field Safety Observations must be performed for at least six months. If additional Actual or Potential Life Threatening/Life Altering incidents or safety violations occur during this period, twice monthly observations must be continued for an additional six months.

No observations are required if Contractors are not actively working for SCE. For Contractors intermittently working for SCE on a non-consistent basis or conducting short-term work, the Edison Representative or Delegate must consult with Edison Safety on the appropriate

frequency of observation. Edison Representatives or Delegates must share observation results with contractors and reinforce the Contractor's responsibility to ensure corrective actions are taken to correct at-risk observations.

3.7.1.2 At-Risk Observations

Unmitigated hazards must be addressed immediately, and Stop Work must be invoked if an imminent risk to workers or the public is present. The Edison Representative or Delegate must immediately communicate safety concerns to the Contractor and establish a timeline for compliance with the terms and conditions of the contract when necessary. If the Contractor does not remedy the situation to SCE's satisfaction, the Edison Representative, Edison Safety, OU leadership, and Supply Management must determine whether the contract should be suspended or terminated, per the Safety Performance Policy.

3.7.1.3 Multiple At-Risk Observations/Safety Issues

If a Contractor has multiple at-risk observations or safety issues, a review team consisting of Edison Safety, Supply Management, and the OU, can be formed to review the observations/issues and to determine appropriate actions, including placing the Contractor on Conditional Status or suspending/terminating the Contractor per the Safety Performance Policy. The review must be initiated by Edison Safety, Supply Management, or the OU.

3.7.2 Contractor Safety Quality Assurance Review

Edison Safety must direct Contractor Safety Quality Assurance Reviews (CSQARs) to be performed on a sampling of Safety Tier 1 Contractors. A CSQAR is an onsite and detailed assessment of the Contractor's safety program implementation and field performance. The process includes a desktop review, field observations, and leadership engagement. Any observed unmitigated hazards must be addressed immediately and escalated if necessary. Safety concerns or issues identified must be documented and communicated to the Contractor and the Edison Representative with an action plan for compliance and mitigation of any concerns or issues. Each year the number of CSQARs to be performed that year is determined by the Director of Edison Safety. Contractors conducting higher-risk work, having higher worker hours, and experiencing recent safety performance issues (e.g., Conditional Contractors) are prioritized to undergo a CSQAR. Edison Safety maintains all documentation associated with the performance of CSQARs.

3.8 Contractor Safety Forums

OUs with active Safety Tier 1 Contractors must ensure Contractor Safety Forums with SCE personnel and active Safety Tier 1 Contractors are held at least once per year and must maintain documentation (e.g., attendance sheets, agendas) of each forum. The purpose of the forums is to discuss relevant safety issues and maintain open lines of communication to ensure mutual safe work efforts. The OUs must organize the forums, with OU Directors or Principal Managers facilitating the discussion, and must cover, at minimum:

- a. Best practices and industry challenges
- b. Contractor safety expectations and requirements, including the reinforcement of roles and responsibilities pertaining to this standard
- c. Lessons learned from incidents

3.9 OU Contractor Safety Advocates (CSA)

OUs with active Safety Tier 1 Contractors must establish a point of contact (referred to as an OU Contractor Safety Advocate) to partner with Supply Management and Edison Safety to help the OU fulfill the Contractor Safety requirements in this Standard and increase OU leadership's visibility to OU compliance with this standard and trends in their Contractors' safety performance. The OU CSA with the assistance of Edison Safety and Supply Management must:

- a. Monitor and maintain OU compliance with Contractor Safety Management responsibilities
- b. Be a resource to OU Edison Representatives and Contractors in their group on safety oversight practices, accountability, and risk management
- c. Oversee OU completion of Edison-specific documents and contractor orientations
- d. Support ISN grade compliance, including any Conditional Contractor Plans (CCPs)

- e. Oversee timely monthly reporting of hours and worker incidents by prime contractors for their group
- f. Help ensure all worker incidents are reported to Edison Safety and that Edison Representatives complete follow-up
- g. Review OU completion of Safety Observations and incident trends for follow-up

3.10 Incident Management

3.10.1 Incident Reporting

The Edison Representative or Delegate must ensure all Contractor safety incidents, while working for SCE, are reported and evaluated as stipulated in the HS Handbook for Contractors, including all injuries (including low-level incidents such as sprains and strains and those that require first aid), crew-caused circuit interruptions, close calls, and property damage incidents. The Edison Representative or Delegate must ensure the following:

- a. Notifications are made regarding defined California Public Utilities Commission (CPUC), OSHA, and Serious Injury Incidents to the Watch Office immediately at (626) 812-4286. Contractors must confirm by email to the Edison Representative or Delegate that this has been completed
- b. The Contractor has completed all notification and report requirements within the allotted timeframes as described in the Contractor Notification and Reporting Requirement section in the HS Handbook for Contractors. Contractors must confirm by email to the Edison Representative or Delegate that this has been completed
- c. All accidents which may involve the Company resulting in personal injuries to, or death of, non-employees must be reported immediately by the first employee having knowledge of the incident by the fastest means of communication to the Watch Office
- d. Within two business days of receipt of the Initial, 5-day and 60-day reports, the Edison Representative must review the Contractor Incident and Evaluation Report Form for accuracy/completeness and request revisions as needed
- e. Upon acceptance of all Contractor reports (including Initial, 5-day and 60-day reports), the Edison Representative must send the report to the following distribution lists:
 - a. SCE Contractor Safety (ContractorSafetyIncidentReporting@sce.com) (All Incidents)
 - b. CCIIncidentReporting@sce.com (Circuit Interruptions only)
 - c. GOTSPILL@sce.com (Hazardous Materials Spills only)
- f. The Edison Representative must follow the instructions on the Contractor Incident and Evaluation Report on entering the Contractor Initial, 5-day and 60-day reports into SCE's incident management software system (i.e., EHSync) within one business day
- g. SCE Claims Department is consulted on sharing/gathering of further information. If advised to do so, the Edison Representative advises the Contractor to add any new details and resubmit the Initial Report, 5-Day, and 60-Day reports as well as any supporting documentation, photographs, etc.
- h. The Contractor has a Corrective Action tracking system to track Corrective Actions from cause evaluations (as required for 60-day reports) and provide data to SCE upon request

3.10.2 Contractor Significant Safety Event Communication

OU leadership will determine whether a Contractor incident is a Significant Safety Event and should be shared with SCE employees and Contractors. Within two business days of a Contractor Significant Safety Event, the OU distributes an internal communication to its employees with preliminary details and key takeaways. As soon as possible, but within two business days of the OU communication, Edison Safety must email this information to Safety Tier 1 Contractors with the expectation that Contractors will share it with their personnel to prevent the same type of incident/injury from repeating.

3.10.3 Monthly Safety Data Reporting

The Edison Representative or Delegate shall ensure Safety Tier 1 Prime Contractors report summary safety data for the previous month into the TPA system (ISN Site Tracker) by 15th of the month as

stipulated in the HS Handbook for Contractors. Data required to be submitted include, but are not limited to:

- a. Hours worked on SCE projects
- b. Number of OSHA Recordable and DART incidents for both Prime Contractors and their Subcontractors while working on SCE projects
- c. Safety Observation data

Contractors must maintain appropriate systems to meet the Monthly Safety Data Reporting requirements. Should an incident be classified as an OSHA Recordable or DART injury after a Contractor initially reports the incident as non-recordable, the Contractor must update the injury classification in the TPA monthly safety data reporting system within three business days. Additionally, Contractors must provide additional information on reported hours and incidents requested by SCE to conduct quality assurance audits on the reported data. Failure to meet Monthly Safety Data Reporting requirements will result in TPA grade penalties and could result in suspension or termination of a contract per SCE's Safety Performance Policy.

3.10.4 Serious Incident and Fatality Incident Review

3.10.4.1 Incident Review Team

Following a Serious Injury or Fatality — e.g., Actual Life Threatening/Life Altering (LT/LA) or High Energy or Fatality (HSIF) or Low Energy Serious Injury or Fatality Incident (LSIF) — the OU must gather an Incident Review Team with leadership from the OU, Supply Management, and Edison Safety to:

- a. Review the incident
- b. Review the Contractor's response to the incident (e.g., cause evaluation, corrective actions, etc.) and the Contractor's general safety performance
- c. Determine appropriate actions, including immediate assignment of Conditional Contractor Status, conducting a CSQAR, or potentially off boarding the Contractor

When there is a Potential LT/LA incident, or Potential Serious Injury or Fatality (PSIF), an Incident Review Team is formed. The Incident Review Team must include the following participants:

- a. For an incident involving a fatality: Directors from the OU, Supply Management, and Edison Safety along with representatives from these groups
- b. For Actual and select Potential LT/LA Incidents or HSIF, LSIF or selected PSIF: Principal or senior managers from the OU, Supply Management, and Edison Safety along with representatives from these groups

The OU must hold initial and follow-up meetings with OU leadership, Supply Management, and Edison Safety leadership to review the incident and associated incident cause evaluations and to determine next steps/actions, including:

- a. Initial Incident Review Call: Within 24 hours of a Contractor fatality or two business days of incident classified as an Actual LT/LA incident, HSIF, or LSIF (and selected Potential LT/LA incidents or selected PSIF), the OU must hold an Initial Incident Review call
- b. 5-Day Follow-up Report Call: Within five business days of receipt of the 5-day follow-up report, the OU must hold a call to review the 5-day report
- c. 60-Day Follow-up Report Call: Within five business days of receipt of the 60-day follow-up report, the OU must hold a call to review the 60-day report
- d. Incident Status Check: At approximately six months from the incident, the OU must reconvene the Incident Review Team to assess the status of the Contractor and determine if any additional actions are needed to ensure the Contractor has taken adequate steps to improve their safety performance

3.10.4.2 Contractor Management Review Committee

Edison Safety convenes a Contractor Management Review Committee (MRC) to review the cause evaluation reports associated with Actual LT/LA incidents, select Potential LT/LA incidents, and HSIF, LSIF, and PSIF incidents. The purpose of the review is to ensure that the cause evaluations adequately identify, analyze, and resolve physical and behavioral conditions that led to the incident. These include organizational and programmatic issues that caused or contributed to an incident. The MRC also reviews associated corrective actions taken to improve the Contractor's safety and reliability performance. The MRC can include employees from Edison Safety, Supply Management, and the OU. A Contractor Representative may be requested to attend.

Contractors must address all feedback from the Contractor MRC, and Prime Contractors are responsible for ensuring their Subcontractors address all Contractor MRC feedback for Subcontractor Incidents. The Edison Representative or Delegate is responsible for engaging the Contractor, sharing information related to the specific incidents under review, and ensuring Contractor action items are completed.

3.10.5 60-Day Report Deadline Extension/Late Reports

Contractors may request additional time to complete a thorough cause evaluation and 60-Day Report by requesting and receiving an extension from the OU Directors and the Edison Safety Director. Extension requests must be submitted to the OU Director and Edison Safety Director, before the due date of the 60-Day Report. Contractors who have not received an extension are subject to immediate stop work for not submitting 60-Day Reports by the established deadline and are not permitted to return to work until their 60-Day report is reviewed and passed by the MRC.

3.11 Training

The Contractor Safety Management Standard computer-based training (CBT) is required training for Edison Representatives and employees identified by OU leadership as having responsibilities related to Contractor safety. Edison Representatives who are new to the role or functioning in a temporary capacity managing Safety Tier 1 contracts must take the Contractor Safety Management Standard CBT course within 30 calendar days of their placement date. After initial implementation of this standard, Edison Representatives who manage Safety Tier 1 contracts and Supply Management staff must be trained to this standard on a biennial basis in conjunction with the Principles of Contract Management CBT schedule.

3.12 Recordkeeping

All Contractor Safety Management records must be kept in accordance with the [SCE's Record Retention Schedule](#).

The TPA retains the following:

- a. Contractor safety performance and program data and information
- b. Contractor grade and classification information
- c. [Conditional Contractor Plans \(CCPs\)](#)
- d. Signed copies of Contractor Orientation Forms for Safety Tier 1 Prime Contractors (including HASP and CHOC)

Supply Management retains documentation and approval from Expedited Safety Review Checklist.

Edison Safety retains documentation associated with CSQARs and the MRC.

Edison Representatives retain the following documents in the project records in accordance with existing contract documentation requirements:

- a. Signed copies of the Contractor Orientation Forms
- b. [Conditional Contractor Plans](#)
- c. Expedited Safety Review Checklist

4.0 ROLES AND RESPONSIBILITIES

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The Roles and Responsibilities Section supplements this standard and the processes described above in Section 3.0 by providing a list of responsibilities by Contractor safety management function. It is not intended to be referenced in place of the standard processes detailed above.

4.1 OU Leadership

- a. Ensures the requirements of this standard are fully implemented in their OU
- b. (OU Director) Approves/denies [Conditional Contractor Plans](#)
- c. (OU Director) Initiates contact with the Supply Management Director to initiate the Expedited Safety Review [Checklist](#) procedure, if necessary
- d. (OU Director and OU VP) Collaborates with Edison Safety Director and VP over Edison Safety to review and approve/deny requests for Expedited Safety Review
- e. Ensures that the Contractor Orientation for Safety Tier 1 Contractors and Field Monitoring requirements described in the Contractor Safety Management Standard are carried out following the approval of an Expedited Safety Review
- f. Ensures at least one forum for Safety Tier 1 Contractors is held annually and leads the discussion
- g. The Edison Representative, Edison Safety, OU leadership, and Supply Management must determine whether the contract must be suspended or terminated, per the Safety Performance Policy, when the Contractor does not remedy unmitigated hazards found during field safety observations to SCE's satisfaction
- h. Establish a point of contact (referred to as an OU Contractor Safety Advocate) to partner with Supply Management and Edison Safety to help the OU fulfill the Contractor Safety requirements in this Standard and increase OU leadership's visibility to OU compliance with this standard and trends in their Contractors' safety performance
- i. Identifies OU employees who have responsibilities related to Contractor safety that are required to take the Contractor Safety Management Standard CBT
- j. Provides necessary support to Edison Representatives to be able to successfully carry out their roles and responsibilities as described in this standard
- k. Participates in a team to review and assess Contractors having multiple at-risk observations or safety issues
- l. Participates in SCE cause evaluations of Contractor incidents and the Management Review Committee as needed to review and provide feedback on Contractor cause evaluation reports
- m. Determines whether a Contractor incident is a Significant Safety Event and must be shared with SCE employees and Contractors
- n. Distributes an internal communication to its employees with details on Contractor Significant Safety Events and lessons learned within two business days of the incident
- o. Convenes an Incident Review Team with leadership from the OU, Supply Management, and Edison Safety 1) to review Actual and Potential LT/LA, HSIF, LSIF and PSIF incidents, the Contractor's response to the incident (e.g., cause evaluation, corrective actions, etc.), and the Contractor's general safety performance and 2) to determine appropriate actions including potentially off-boarding the Contractor
- p. Participates in the Management Review Committee and reviews and provides feedback on Contractor performed cause evaluations

4.2 Edison Representatives of Safety Tier 1 Contractors

4.2.1 Qualification Requirements for Safety Tier 1 Contractors

- a. Identify tier level of work to be performed on the initial purchase requisition
- b. (For Safety Tier 1 HR Contracts) In conjunction with Supply Management, coordinate with Edison Safety for the lifecycle of the procurement process, including the development of the request for proposal (RFP), project specifications, job aids, and scoring criteria
- c. Initiate the Contractor Handbook and Orientation Checklist (CHOC) as part of the request for proposal (RFP) and provide the most current version of the SCE Handbook for Contractors
- d. Register with ISN to gain access to the TPA system

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- e. Monitor changes in TPA grades and classification status for their Safety Tier 1 contractor(s)
- f. Ensure that an SCE Contractor Hazard Assessment and Safety Plan of Safety Tier 1 project work is initiated and included in the request for proposal (RFP) so the hazards associated with the work known to SCE at the time the RFP is issued are clear to the bidders
- g. Review the Hazard Assessment and Safety Plan and update (and re-sign) the plan annually or as needed
- h. Review and sign updated Hazard Assessment and Safety Plans
- i. Ensure Critical Observable Actions (COA) HASP templates are used for all Safety Tier 1 HR contracts. (See Section 3.5.3)
- j. Ensure Safety Tier 1 Contractors establish an account with SCE's TPA and furnish all necessary information to meet safety qualification requirements before conducting Safety Tier 1 work
- k. Ensure Safety Tier 1 Prime Contractors notify SCE of their intention to use Safety Tier 1 Subcontractors
- l. Ensure Prime Contractors utilize only Qualified or Conditional Subcontractors to conduct Safety Tier 1 work
- m. Ensure Prime Contractors register their use of Safety Tier 1 Subcontractors in the TPA system (ISN SubTracker)
- n. Ensure Safety Tier 1 Prime Contractors monitor Subcontractor ISN grades to ensure Subcontracts maintain Qualified status or Conditional Status with an approved [Conditional Contractor Plan](#)
- o. Ensure Safety Tier 1 Prime Contractors maintain up-to-date Hazard Assessment and Safety Plan (HASP) and SCE Contractor Handbook and Orientation Checklist (CHOC) to accurately reflect the list of current subcontractors. The updated document must be uploaded into the TPA system
- p. Ensure Safety Tier 1 Prime Contractors update the Worker and Subcontractor Orientation sections of the HASP & CHOC and ensure the proposed steps include the requirements specified by SCE and those each company employs to ensure they are training and qualifying their workforce
- q. Ensure Safety Tier 1 Prime Contractors develop procedures for conducting observations and managing the performance of their subcontractors, including incident management
- r. Ensure Safety Tier 1 Prime Contractors use only approved Subcontractors technically qualified by SCE Aircraft Operations consistent with the Use of Company Owned, Contract and Chartered Aircraft Policy for aircraft operations performed for SCE
- s. Ensure Safety Tier 1 Contractors with TPA C grades develop [Conditional Contractor Plans](#) and collaborate with Supply Management and Edison Safety to receive approval of the plans from the OU Director, the Edison Safety Director 30 days of a grade change or request and receive approval from the OU Director and Edison Safety Director for an extension if additional time is needed to ensure the Contractor develops a robust Conditional Contractor Plan
- t. Ensure that the Contractor has updated their previously approved [Conditional Contractor Plans](#) prior to requesting an approval extension if an extension is required beyond the standard one-year approved period
- u. Review and approve Contractor TPA program review exemption requests in conjunction with the Edison Safety
- v. Collaborate with the Contractor Representative during an Expedited Safety Review [Checklist](#) to develop an SCE Contractor Hazard Assessment and Safety Plan to identify and ensure mitigation of the hazards associated with the work to be performed
- w. Ensure that they or a Delegate are onsite at all times while the work is being performed following an Expedited Safety Review to ensure rules/policies pertaining to the job are followed, safe work practices are utilized, and that risks and hazards associated with the job are identified, discussed, and mitigated before work begins
- x. Ensure Conditional Contractors conduct a minimum of one field safety observation of each crew conducting work for SCE per month

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- y. Ensure Conditional Contractors submit quarterly reports to SCE on progress implementing the plan (including the number of safety observations, safety team meetings, and safety stand-downs conducted with their employees conducting SCE work) and review the Conditional Contractor Quarterly Report to assess whether the Contractor has met its Conditional Contractor Plan Requirements and follow up with the Contractor as needed
- z. Verify Prime Contractors fulfill Subcontractor Management Responsibilities including requirements for Subcontractor Safety Prequalification, Prime Contractor Safety Review of Subcontractors, Safety Orientation, Safety Observation, Incident Reporting and Cause Evaluation
 - aa. Ensure Contractors meet Onsite Supervisor, Safety Professional, New Employee Supervision and Training, Safety Observation Program, Tailboard, Safety Culture Training, Critical Observable Actions, Stop Work Responsibility, AED, and Fitness for Duty requirements if applicable
 - bb. (Safety Tier 1 HR Contractors) Verify Safety Tier 1 HR Contractors meet the Automated External Defibrillator requirement specified in Section 3.3.4
 - cc. Verify that the Contractor has a plan to train and provide additional supervisory oversight for newly hired workers conducting Safety Tier 1 work during their first six months of employment and for workers during the first six months following assignment to a new role
 - dd. For all scopes of Safety Tier 1 HS work, provide a list of SCE plans and programs as base-level expectations and guidance documents that apply to the work for the contractor's review and consideration (See Section 3.5.4 for details)

4.2.2 Contractor Orientation for Safety Tier 1 Contractors

- a. Participate in a Contractor Orientation and review the HS Handbook for Contractors with the Contractor
- b. Ensure a Contractor Orientation is performed before work begins on a project by a Safety Tier 1 Contractor
- c. Ensure that an [SCE Contractor Hazard Assessment and Safety Plan](#) of the Safety Tier 1 project work is completed and conduct an annual review of the SCE Contractor Hazard Assessment and Safety Plan
- d. Sign the HASP once both the Contractor Representative and the Edison Representative are fully aligned on the content of the plan
- e. Ensure a review of the [SCE Contractor Handbook and Orientation Checklist](#) is completed
- f. Ensure the [SCE Contractor Handbook and Orientation Checklist](#) is signed by the Prime Contractor Representative as well as Subcontractor Representatives
- g. Sign the [SCE Contractor Handbook and Orientation Checklist](#) after conducting Contractor Orientation
- h. Work together with the Prime Contractor Representatives to ensure the [SCE Contractor Hazard Assessment and Safety Plan and SCE Contractor Handbook and Orientation Checklist](#) are completed and signed by the Edison Representative, the Prime Contractor Representative, and all Subcontractors' Representatives prior to the start of work
- i. Ensure that Contractors identify whether a Tier 1 Subcontractor will be needed to complete a project during the orientation process
- j. Ensure the Onsite Supervisor Requirement is reviewed with the Safety Tier 1 Contractor during the orientation process
- k. Ensure that the Safety Professional Requirement is reviewed with the Safety Tier 1 Contractor Representative during the orientation process and monitored for compliance during Field Safety Observations
- l. Ensure the SCE Contractor Hazard Assessment and Safety Plan, and the SCE Contractor Handbook and Orientation Checklist are archived in project records
- m. Ensure Safety Tier 1 Contractor uploads copies of the completed/signed SCE Contractor Hazard Assessment and Safety Plan and the SCE Contractor Handbook and Orientation Checklist into the TPA system within 10 business days of the Contractor Orientation

- n. Verify Contractors have Stop Work Responsibility procedures in place and training has occurred during the Contractor Orientation process
- o. Verify Contractors meet the Fitness for Duty policy requirement during the Contractor Orientation process. See Section 3.4.8 for details

4.2.3 Contractor Orientation for Safety Tier 2 Contractors

- a. Ensure a Contractor Orientation is performed before work begins on a project by a Safety Tier 2 Contractor
- b. Ensure the Prime Contractor conducts a Contractor Orientation for their crews including Subcontractors, as well as any new employees/Subcontractors that begin work on the project after the original Contractor Orientation
- c. Ensure the development/review of the SCE Contractor Handbook and Orientation Checklist
- d. Work together with the Prime Contractor Representatives to ensure the SCE Contractor Handbook and Orientation Checklist is completed and signed by the Edison Representative, the Prime Contractor Representative, and all Subcontractors' Representatives before work begins

4.2.4 Field Monitoring

- a. Ensure that Field Safety Observations are performed for Safety Tier 1 Contractors following the frequency stipulated in Section 3.7.1.1
- b. Ensure that Field Safety Observations are documented and submitted within five business days of completion in the SCE Safety Observation Tool
- c. Ensure that during Field Safety Observations, safety concerns are communicated to the Contractor Representative and addressed or escalated as needed
- d. Unmitigated hazards must be addressed immediately, and Stop Work must be invoked if an imminent risk to workers or the public is present
- e. Share Field Safety Observation results with Contractors and reinforce the Contractor's responsibility to ensure corrective actions are taken to correct at-risk observations
- f. If the Contractor does not remedy unmitigated hazards found during field safety observations to SCE's satisfaction, the Edison Representative, Edison Safety, OU leadership, and Supply Management must determine whether the contract must be suspended or terminated, per the Safety Performance Policy
- g. Review the [SCE Contractor Hazard Assessment and Safety Plan](#) with Delegate, if applicable, to help them become knowledgeable of the Contractor's work scope and hazards/mitigation measures associated with the work

4.2.5 Incident Reporting and Cause Evaluation Requirements

- a. Ensure that Contractor safety incidents are submitted as well as any additionally required documentation as stipulated in the Section 3.10.1
- b. Ensure Safety Tier 1 Prime Contractors report summary safety data for the previous month into the TPA system (ISN Site Tracker) by 15th of the month as specified in the HS Handbook for Contractors
- c. Engage the Contractor, sharing information related to the specific incidents under review and ensuring Contractor action items are completed

4.2.6 Training

- a. Complete the Contractor Safety Management Standard CBT on a biennial basis along with the Principles of Contract Management CBT schedule
- b. Complete the Contractor Safety Management Standard CBT within 30 days of hire date when Edison Representatives are new to the role or assigned a temporary role

4.2.7 Recordkeeping

- a. Retain documents in the project records in accordance with Section 3.12 of this standard and with existing contract documentation requirements

4.3 Safety Tier 1 Contractors

4.3.1 Qualification Requirements for Safety Tier 1 Contractors/Subcontractors

- a. Establish an account with SCE's TPA (ISN) and furnish all necessary information to meet safety qualification requirements prior to conducting Safety Tier 1 work
- b. (Bidders) Review the Handbook for Contractors and execute the CHOC as evidence confirming of understanding SCE's expectations during the procurement process
- c. (Bidders) Fully outline planned approach to orientation, training, and management of employees and subcontractors to ensure proper orientation and understanding of the expectations while working on SCE property
- d. (Bidders) Review the [Hazard Assessment and Safety Plan](#), confirm the hazards, and populate the mitigation measures for SCE's review per the plan instructions. Fully fill out the HASP for SCE's review and consideration in the bidding process
- e. (Bidders) Evaluate SCE plans and programs provided by the Edison Representative as minimum requirements while working on SCE property and either develop safety plans and programs that meet or exceed the SCE-provided documents or implement the plans as written. (See Section 3.5.4 for details)
- f. List the provided SCE plans and programs on the HASP and update as additional plans and programs and procedures are provided for the life of the contract. (See Section 3.5.4 for details)
- g. Upon successful bid, participate in a Contractor Orientation and review the HS Handbook for Contractors with the Edison Representative completing the execution of the CHOC
- h. Upon successful bid, update the [Hazard Assessment and Safety Plan](#) as needed and submit it to the Edison Representative for review
- i. Review the [Hazard Assessment and Safety Plan](#) and update (and re-sign) the plan annually or as needed
- j. Sign the HASP once both the Contractor Representative and the Edison Representative are fully aligned on the content of the plan
- k. Review the [Hazard Assessment and Safety Plan](#) and update (and re-sign) the plan annually or as needed
- l. Update the [Hazard Assessment and Safety Plan](#) if any elements change.
- m. Review and sign updated [Hazard Assessment and Safety Plans](#)
- n. Upload updated and signed [Hazard Assessment and Safety Plans](#) to the TPA system
- o. (Safety Tier 1 HR Contractors) Use the Critical Observable Actions (COA) HASP templates (see Section 3.5.3)
- p. Undergo TPA review and qualification regardless of whether the Safety Tier 1 work is conducted themselves or by Safety Tier 1 Subcontractors
- q. Monitor changes in TPA grades and classification status
- r. Develop a safety improvement plan in collaboration with the Edison Representative using [Conditional Contractor Plan](#) form when receiving a TPA grade of C and obtain SCE approval of the plan
- s. (Prime Contractors) Ensure their Subcontractors which have a TPA C grade develop a [Conditional Contractor Plan](#)
- t. Comply with all applicable local, state, and federal regulations as well as any additional requirements stipulated by SCE such as those in SCE's safety standards and programs
- u. Ensure a Contractor Safety Professional is onsite at all times while the work is being performed following an [Expedited Safety Review Checklist](#) to ensure rules/policies pertaining to the job are followed, safe work practices are utilized, and that risks and hazards associated with the job are identified, discussed, and mitigated prior to commencing work
- v. Submit necessary items to TPA for review and achieve Qualified Contractor or Conditional status as soon as possible but no later than 30 calendar days of grade change if the TPA grade of Contractor changes to a C or an F due to expired programs, expired program exemption requests, expired Conditional Contractor Plans, or non-submission of performance data such as EMR
- w. Develop and submit an acceptable Conditional Contractor Plan to the Edison Representative so that it is approved as soon as possible, but no later than 15 calendar

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days after a grade change to C due to safety performance unless an extension is granted by SCE, and submit quarterly reports to SCE on progress implementing the plan (including the number of safety observations, safety team meetings, and safety stand-downs conducted with their employees conducting SCE work)

- x. Implement a Safety Observation Program with the ability to track and trend observation data
- y. (Prime Contractors) Fulfill Subcontractor Management Responsibilities including requirements for Subcontractor Safety Prequalification, Prime Contractor Safety Review of Subcontractors, Safety Orientation, Safety Observation, Incident Reporting, and Cause Evaluation
- z. (Prime Contractors) Conduct safety review of Subcontractors which must include a review of hazards associated with the work to be performed and of the Subcontractor's mitigation measures to address those hazards
- aa. Meet Onsite Supervisor, Safety Professional, New Employee Supervision and Training, Safety Observation Program, Tailboard, Safety Culture Training, Critical Observable Actions, Stop Work Responsibility, AED, and Fitness for Duty requirements as applicable
- bb. (Safety Tier 1 HR Contractors) Require each crew to have an automated external defibrillator (AED) onsite by July 1, 2021 when conducting work on or near energized high-voltage electrical equipment
- cc. (Safety Tier 1 HR Contractors) Train their employees working on or near energized high-voltage lines or equipment on AED use
- dd. Provide a supervisor/person in charge who is responsible for the general work area for Safety Tier 1 work at any jobsite involving more than one worker. This person must ensure rules/policies pertaining to the job are followed, safety work practices are utilized, and risks and hazards associated with the job are identified, discussed, and mitigated before beginning work
- ee. A minimum of one dedicated Safety Professional per 50 employees (including prime and sub-contractor personnel) must be available and actively supporting operations
- ff. (Safety Tier 1 HR Contractors) A minimum of one dedicated Safety Professional per 30 employees (including prime and sub-contractor personnel) must be available and actively supporting operations
- gg. (Safety Professionals) Meet the requirements for Safety Professionals established in Section 3.4.2
- hh. (Safety Professionals) Manage work practices and procedures that directly support the elimination of Serious Injuries and Fatalities
- ii. (Safety Professionals) Coordinate efforts to ensure compliance with all applicable rules and procedures
- jj. (Safety Professionals) Coordinate the execution of SCE's Handbook of Contractor expectations, referring to Section 3.4.2 for more details
- kk. (Safety Tier 1 HR Contractors who have worked or plan to work at least 25,000 hours/year for SCE) Implement a Leader Safety Culture Training course for all of its leaders (including management, foremen, and supervisors) overseeing employees conducting Safety Tier 1 work for SCE by Dec. 1, 2021. See Section 3.4.6 for details

4.3.2 Contractor Orientation for Safety Tier 1 Contractors

- a. (Prime Contractors) Conduct a Contractor Orientation for their employees and any Subcontractors at the start of a project and for other employees and Subcontractors that begin work on the project after the original Contractor Orientation
- b. (Safety Tier 1 HR Contractors) If working within a scope of work for which SCE has developed Critical Observable Actions (COAs), accept these COAs and train their workforce to these expectations during onboarding and orientation processes while working for Southern California Edison
- c. (Contractor Representatives) Collaborate with Edison Representatives to develop an [SCE Contractor Hazard Assessment and Safety Plan](#) to identify and ensure mitigation of the hazards associated with the work to be performed

- d. (Source Contractors) Develop and submit an SCE Contractor Hazard Assessment and Safety Plan for Source Contractors at the start of the contract, and review the SCE Contractor Hazard Assessment and Safety Plan annually and update as needed
- e. Work together with the Edison Representative to ensure the [SCE Contractor Hazard Assessment and Safety Plan and SCE Contractor Handbook and Orientation Checklist](#) are completed and signed by the Edison Representative, the Prime Contractor Representative, and all Subcontractors' Representatives prior to the start of work
- f. Upload copies of the completed/signed SCE Contractor Hazard Assessment and Safety Plan and the [SCE Contractor Handbook and Orientation Checklist](#) into the TPA system within 10 business days of the Contractor Orientation
- g. Upload the updated SCE Contractor Hazard Assessment and Safety Plan in the TPA system after the annual review for Source Contractors
- h. Provide management and supervisory oversight of Contractor employees
- i. Provide safety oversight of the work being performed
- j. (Prime Contractors) Ensure a signed copy of the SCE Contractor Hazard Assessment and Safety Plan and the SCE Contractor Handbook and Orientation Checklist is retained by all crews while conducting Safety Tier 1 work for SCE
- k. Be responsible for the Subcontractor and their work performance at all times when carrying out work for SCE
- l. Provide notice to the Edison Representative of intention to use a Subcontractor before work begins by the Subcontractor
- m. Register their use of Subcontractors in the TPA system (ISN SubTracker)
- n. Utilize only Qualified or Conditional Subcontractors to conduct Safety Tier 1 work
- o. Safety Tier 1 Prime Contractors register their use of Tier 1 Subcontractors in the TPA system (currently ISN SubTracker)
- p. (Prime Contractors) Monitor Subcontractor ISN grades to ensure Subcontractors maintain Qualified status or Conditional Status with an approved [Conditional Contractor Plan](#)
- q. (Prime Contractors) Maintain up-to-date [Hazard Assessment and Safety Plan](#) (HASP) and [SCE Contractor Handbook and Orientation Checklist](#) (CHOC) to accurately reflect the list of current subcontractors. The updated document shall be uploaded into the TPA system
- r. (Prime Contractors) Update the Worker and Subcontractor Orientation sections of the HASP & CHOC and ensure the proposed steps include the requirements stipulated by SCE and those each company employs to ensure they are training and qualifying their workforce.
- s. (Prime Contractors) Develop procedures for conducting observations and managing the performance of their subcontractors, including incident management
- t. (Prime Contractors) Use only approved Subcontractors for aircraft operations performed for SCE who are technically qualified by SCE Aircraft Operations consistent with the [Use of Company Owned, Contract and Chartered Aircraft Policy](#)
- u. Verify during the Contractor Orientation process that the onsite supervision requirements in Section 3.4.1 will be met
- v. Ensure the Onsite Supervisor Requirement that Safety Tier 1 Contractors provide an onsite supervisor/person responsible for all Safety Tier 1 work is met
- w. Provide a dedicated, competent Safety Professional when the number of their Contractor employees conducting Safety Tier 1 work for SCE exceeds 50 personnel
- x. Ensure that where Safety Tier 1 projects exceed 50 employees at one general work location, a dedicated Safety Professional is maintained in support of the work, and collaboration with the Edison Representative occurs to determine the number of Safety Professionals needed to support Safety Tier 1 projects exceeding 100 employees
- y. Ensure development and implementation of a plan to provide additional supervisory oversight for newly hired workers during their first six months of employment and for workers during the first six months following assignment to a new role (e.g., newly promoted lineman, supervisor, etc.)

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- z. Develop and maintain a formal training program which at a minimum includes orientation training for newly hired employees and periodic continuing training in relevant topics for all employees
- aa. Conduct Tailboard meetings with all workers at job sites. Tailboard must meet the requirements found in Section 3.4.5
- bb. Ensure all employees and Subcontractor employees are trained that they have a responsibility to immediately stop work any time unsafe conditions or behaviors are observed until the job can be completed safely
- cc. Have a Fitness for Duty (FFD) policy and ensure employees are trained on FFD policies. The policy shall include FFD testing following all incidents involving SIFs, an injury to a third party, significant loss of power to customers, or significant property damage

4.3.3 Field Monitoring

- a. Implement a Safety Observation Program by July 1, 2021
- b. Conduct at minimum of one observation per crew each month (including prime and subcontractor employees)
- c. (Safety Tier 1 HR Contractors) conduct and document a minimum of two observations per crew each month (including prime and subcontractor employees)
- d. (Prime Safety Tier 1 Contractors) Enter observation data into ISN's Site Tracker
- e. Take action to mitigate any hazards, risks, or safety concerns identified and communicated by SCE during Field Safety Observations or by any other method to ensure safe work practices of the Contractor
- f. Collaborate with SCE personnel by providing requested documentation and answering relevant questions during CSQARs
- g. (Conditional Contractors) Conduct at least two field safety observation of each crew conducting Safety Tier 1 work for SCE per month
- h. (Conditional Contractors) Submit quarterly reports to SCE by the 15th of the month after the end of a quarter using the [Conditional Contractor Quarterly Report form](#)
- i. (Prime Contractors) Conduct monthly field observations for each of their Subcontractor crews while actively conducting SCE work on their behalf. Refer to Section 3.4.4 for additional details on this requirement

4.3.4 Contractor Safety Forums

- a. Attend and participate in Contractor Safety Forums as directed and organized by OU leadership

4.3.5 Incident Reporting and Cause Evaluation Requirements

- a. Ensure that Contractor safety incidents are reported and evaluated as well as complete additionally required documentation as stipulated in the HS Handbook for Contractors or by SCE
- b. (Prime Contractors) Ensure all Subcontractor safety incidents are reported and evaluated as stipulated in the HS Handbook for Contractors, including all injuries (including low-level incidents such as sprains and strains and those that require first aid), crew-caused circuit interruptions, close calls, and property damage incidents
- c. Report summary safety data for the previous month into the TPA system (ISN Site Tracker) by 15th of the month
- d. Update the injury classification in the TPA monthly safety data reporting system within three business days should an incident be classified as an OSHA Recordable or DART injury after it is initially reported as non-recordable
- e. Provide additional information on reported hours and incidents requested by SCE to conduct quality assurance audits on the reported data
- f. Address all feedback on Contractor incident cause evaluations from the Contractor MRC
- g. (Prime Contractors) Ensure Subcontractors address all Contractor MRC feedback for Subcontractor Incidents

4.4 Edison Safety – Contractor Safety Management

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- a. Governs and maintains the Contractor Safety Management Standard and oversees its implementation
- b. Governs and maintains the HS Handbook for Contractors, job aids, and other documents associated with this standard
- c. (For Safety Tier 1 HR Contracts) Coordinates with Edison Representatives and Supply Management for the lifecycle of the procurement process, including the development of the request for proposal (RFP), project specifications, job aids, and scoring criteria
- d. (For Safety Tier 1 HR Contracts) Support the request for proposal (RFP) by providing information and feedback to support the procurement process, including providing guidance for safety requirements, supporting job walks, evaluating and scoring bidder responses, and supporting the selection process
- e. Must verify during Field Safety Observations that Contractors are meeting the onsite supervision requirement (Section 3.4.1)
- f. Verifies the Tailboard Requirement is met during Field Safety Observations
- g. Serves as Edison Representative for the TPA
- h. (Edison Safety Director) Approves/denies [Conditional Contractor Plans](#)
- i. (Edison Safety Director) Approves/denies Contractor grade adjustments requested via the Contractor [Safety Points Request Form](#)
- j. Provides expertise in the event of an [Expedited Safety Review Checklist](#)
- k. (Edison Safety Director and VP over Edison Safety) Collaborate with OU Director and OU VP to review and approve/deny requests for Expedited Safety Reviews and the associated Hazard Assessment and Safety Plan
- l. Provides assistance to Edison Representatives in determining tier level of work that the Contractor will perform that is to be included on the initial purchase requisition
- m. Provides assistance as needed to Edison Representatives in identifying safety requirements pertaining to the scope of work that are above and beyond California OSHA, Federal OSHA, and other regulatory requirements that are to be included on the initial purchase requisition for Safety Tier 1 Contractors
- n. Ensures that CSQARs are performed
- o. (Edison Safety Director) Each year determine the number of CSQARs to be performed that year
- p. Retains documentation associated with the performance of CSQARs
- q. Any unmitigated hazards observed during CSQARs must be addressed immediately and escalated when necessary
- r. Partner with the OU Contractor Safety Advocate and Supply Management to help the OU fulfill the Contractor Safety requirements in this Standard and increase OU leadership's visibility to OU compliance with this standard and trends in their Contractors' safety performance
- s. Reviews and approves Contractor TPA program review exemption requests in coordination with the Edison Representative
- t. Reviews this standard and its components at least once every three years per the program review schedule and updates this standard as necessary
- u. Participates in a team to review and assess Contractors having multiple at-risk observations or safety issues
- v. If the Contractor does not remedy unmitigated hazards found during field safety observations to SCE's satisfaction, the Edison Representative, Edison Safety, OU leadership, and Supply Management must determine whether the contract should be suspended or terminated, per the Safety Performance Policy
- w. Distributes an email communication to Safety Tier 1 Contractors with details and lessons learned from Contractor Significant Safety Events within two business days of OU communication
- x. Participates in a team to review and assess Contractors having multiple at-risk observations or safety issues
- y. Participates in the Management Review Committee and reviews and provides feedback on Contractor performed cause evaluations
- z. Maintains documents associated with the Management Review Committee
- aa. Participates in Incident Review Team 1) to review Actual and Potential LT/LA, HSIF, LSIF and PSIF incidents, the Contractor's response to the incident (e.g., cause evaluation, corrective actions, etc.), and the Contractor's general safety performance and 2) to determine appropriate actions, including potentially off-boarding the Contractor

- bb. Provides oversight of Contractor safety performance data and information collected for and in collaboration with the TPA

4.5 Supply Management

- a. (For Safety Tier 1 HR Contracts) In conjunction with Edison Representatives, coordinate with Edison Safety for the lifecycle of the procurement process, including the development of the request for proposal (RFP), project specifications, job aids, and scoring criteria
- b. Provides oversight of Contractor safety performance data and information collected for and in collaboration with the TPA
- c. Provides oversight of the Contractor qualification and classification processes
- d. Works with the Edison Representatives to ensure Contractors are compliant with TPA requirements.
- e. Oversees the collaboration with the Edison Representative and Contractor Representative to develop a [Conditional Contractor Plan](#) for Contractors with a TPA C grade
- f. Assists the OU in carrying out the Safety Performance Policy, when necessary
- g. (Supply Management Director) Works with the OU to carry out the [Expedited Safety Review Checklist](#) procedure
- h. Retains documentation and approval from Expedited Safety Review Checklist
- i. When the Contractor does not remedy unmitigated hazards found during field safety observations to SCE's satisfaction, the Edison Representative, Edison Safety, OU leadership, and Supply Management must determine whether the contract must be suspended or terminated, per the Safety Performance Policy
- j. Participates in a team to review and assess Contractors having multiple at-risk observations or safety issues
- k. Partners with the OU Contractor Safety Advocate and Edison Safety to help the OU fulfill the Contractor Safety requirements in this Standard and increase OU leadership's visibility to OU compliance with this standard and trends in their Contractors' safety performance
- l. Participates in Incident Review Team 1) to review Actual and Potential LT/LA, HSIF, LSIF and PSIF incidents, the Contractor's response to the incident (e.g., cause evaluation, corrective actions, etc.), and the Contractor's general safety performance and 2) to determine appropriate actions including potentially off-boarding the Contractor
- m. Participates in the Management Review Committee and reviews and provides feedback on Contractor performed cause evaluations
- n. Administer Contractor monthly safety data reporting processes in the TPA system (ISN Site Tracker)

4.6 Third Party Administrator (TPA)

- a. Conducts safety review and qualification of all Safety Tier 1 Contractors prior to their conducting Safety Tier 1 work for SCE
- b. Reviews and scores Safety Tier 1 Contractors on safety performance, programs, and culture
- c. Collects relevant Safety Tier 1 Contractor safety data and programs
- d. Reviews Safety Tier 1 Contractor safety data and programs and grades the Contractor based on the review
- e. Maintains the Safety Tier 1 Contractor qualification information
- f. Monitors the Safety Tier 1 Contractor classifications on an ongoing basis and communicates changes to SCE and the Contractor
- g. Provides results of the review to Contractor
- h. Retains Contractor safety performance and program data and information
- i. Retains Contractor classification information
- j. Retains [Conditional Contractor Plans](#)
- k. Retains signed copies of Contractor Orientation Forms for Safety Tier 1 Prime Contractors (including HASP and CHOC)

5.0 DEFINITIONS

The Definitions section defines specific terms used in the document. A definition is needed if a universally accepted definition of a common term has a different meaning or a company-specific meaning when read in context of the procedure.

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Actual and Potential LT/LA Incidents: Incidents including any one of the following incident types:

- a. Actual Life Threatening (LT) - Requires immediate life-preserving rescue action that, if not applied, would likely result in the death of the person, and will usually require external emergency response to provide life-sustaining support. Includes fatalities
- b. Actual Life Altering (LA) - Results in a permanent and significant loss of a major body part or organ function; permanent changes, long-term impairment, or disability to normal life activity
- c. Potential LT or LA- Had circumstances been different by one or two factors, there is a high probability the outcome could have become a Life Threatening or Life Altering incident

SCE is moving from the LT/LA Model of classification of injuries to the EEI Safety Classification and Learning Model (HSIF, LSIF, PSIF) in 2021. New classifications include:

- a. **High Energy Serious Injury and Fatality (HSIF):** Incident with a release of high energy in the absence of a direct control where a serious injury is sustained
- b. **Low Energy Serious Injury and Fatality (LSIF):** Incident with a release of low energy in the absence of a direct control where a serious injury is sustained
- c. **Potential Serious Injury and Fatality (PSIF):** Incident with a release of high energy in the absence of a direct control where a serious injury is not sustained

Close Call: Incidents where no personal injury was sustained, but where given a slight shift in time or position, injury easily could have occurred.

Contractor: The party entering into a contract to perform work for SCE. This term also includes the Contractor's agent, person, or persons authorized to represent the Contractor, such as the Contractor's superintendent or foreman. For this standard, the term "Contractor" is used to denote both Prime Contractors and Subcontractors unless otherwise stated. Additionally, the term "Contractor" excludes other types of Supplemental Workers such as Contingent Workers, Consultants, and Professional Services.

Conditional Contractors: Safety Tier 1 Contractors who, following safety performance and program review by the TPA, exhibit areas in their historic safety performance that may be below SCE and/or industry standard and may have scored low in safety culture but are qualified to perform work at SCE with the condition that additional mitigation procedures contained in a [Conditional Contractor Plan](#) are in place to correct previously identified deficiencies.

Conditional Contractor Plan: A documented safety improvement plan that supports the review and approval/denial for a Conditional Contractor/Subcontractor to perform work at SCE. When a Contractor/Subcontractor is categorized as Conditional, the Contractor, in collaboration with the Edison Representative, must develop a safety improvement plan using the [Conditional Contractor Plan Form for approval by the OU Director and the Edison Safety Director](#).

Contractor Handbook and Orientation Checklist: A document that is used during the Orientation process for the Edison Representative and the Contractor to review the safety requirements in the HS Handbook for Contractors and to document the Contractor's understanding and acknowledgement of these requirements.

Contractor Representative: The Contractor employee named in the contract or appointed by the Contractor to act on behalf of the Contractor.

Contractor Safety Advocate: An OU point of contact who partners with Supply Management and Edison Safety to help the OU fulfill the Contractor Safety Management requirements in this standard and to increase OU leadership's visibility to OU compliance with this standard and trends in their Contractors' safety performance so that follow-up action can be taken as needed.

Contractor Safety Quality Assurance Review (CSQAR): A CSQAR is an onsite and detailed assessment of the Contractor's safety program implementation and field performance. The process includes a desktop review, field observations, and leadership engagement with a focus on the elimination of serious injuries and fatalities.

Critical Observable Actions (COAs): Visible actions or conditions that must be true to mitigate existing or potential Primary Hazards that can lead to serious injuries or fatalities.

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Delegate (of Edison Representative): An Edison employee or Supplemental Worker designated by the Edison Representative who is familiar with the contract work being performed and trained to act as an SCE point of contact for the contracted work.

Edison Representative: An SCE employee responsible for managing the work performed under a contract. The Edison Representative may designate a trained SCE point of contact as a Delegate Edison Representative who is familiar with the contract work being performed.

Hazard Assessment and Safety Plan (HASP): A tool for Edison Representatives to collaborate with Contractor leadership to document hazard awareness and mitigation plans before any Safety Tier 1 work begins. The assessment identifies potential health and safety issues and hazard mitigation associated with the project/work scope, and the project/work locations known to SCE at the time the RFP is issued, and the Contractor's plans to mitigate those hazards.

ISNetworld (ISN): SCE's third-party administrator (TPA) which conducts safety qualification of all Safety Tier 1 Contractors, collects monthly safety data submissions by Contractors, and maintains a repository for contractor safety documentation.

Job Hazard Analysis (JHA): A process-based document that identifies the critical steps of commonly performed tasks. In evaluating these steps, the potential hazards and recommended hazard mitigation are identified. Note: The JHA is different from the Tailboard.

Qualified Contractors: Safety Tier 1 Contractors who, following safety performance and program review by the TPA, meet or exceed SCE established standards for safety performance and programs and are approved to perform Safety Tier 1 work at SCE.

Primary Hazard: A hazard that has the potential to cause serious injury or death.

Prime Contractor: The Contractor who has a contract with SCE for a scope of work/project and has the full responsibility for its completion. A Prime Contractor may employ and manage one or more Subcontractors to carry out specific parts of the contract.

Safety Professional: A certified safety employee whose responsibility is solely that of ensuring safe work practices and compliance with safety and health regulations.

Significant Safety Event: A Significant Safety Event is used to describe an incident determined by the OU that should be communicated to its employees for lessons learned and can be any one of the following:

- a. Actual Life Threatening (LT) or HSIF or LSIF
- b. Actual Life Altering (LA) or HSIF or LSIF
- c. Potential LT or LA or PSIF

Site Tracker: The ISNetworld reporting tool used by Prime Contractors to report monthly hours worked and safety performance data for themselves and their subcontractors.

Source Contractor: A contractor who performs repetitive project work under an agreement that lasts for an extended period of time.

Stop Work: The principle that all employees and Contractors take personal responsibility to STOP WORK when they observe hazardous conditions or unsafe actions so that the unsafe conditions/actions can be mitigated.

Subcontractors: A business or person hired by a Contractor to carry out specific parts of a contract for SCE as part of a larger project.

Sub Tracker: The ISNetworld tool that documents the associations between Subcontractors and Prime Contractors performing work for SCE.

Supplemental Workers: Refer to the Supplemental Workers Policy for the definition.

Tailboard: A conference, a pre-job briefing, a tailgate meeting, a job procedure discussion, or talking the job over before starting to work to ensure all supervisors and members of each crew involved thoroughly understand the job to be performed and the method of accomplishing it in a safe manner. Note: The Tailboard is different from the JHA.

Third Party Administrator (TPA): A professional service provider contracted by SCE to evaluate contractor safety performance and programs on behalf of SCE.

Safety Tier 1: A designation assigned to contracted work activities that are high risk and, without implementation of appropriate safety measures, are potentially hazardous or life threatening.

Safety Tier 2: A designation assigned to contracted work activities that are lower risk or routine in nature and not typically considered hazardous.

Unqualified Contractors: A Safety Tier 1 Contractor who, following safety performance and program review by the TPA, does not meet SCE and/or industry standards for safety performance and/or safety programs and cannot perform work at SCE. Unqualified Contractors include those with a TPA grade of F and those with a grade of C without an SCE-approved Conditional Contractor Plan.

6.0 REFERENCES

External References

None

Internal References

[Company-Owned, Contract and Chartered Aircraft Standard HS Handbook for Contractors \(SCE-EHS-SAFETY-HB-1\)](#)

7.0 KEY CONTACTS

Edison Contractor Safety: ContractorSafety@sce.com

Edison
HelpLine
Seek advice | Report concerns

1-800-877-7089

www.EdisonHelpLine.com

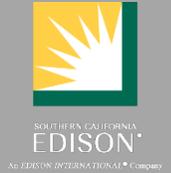
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Appendix A: Safety Tier Classification



The purpose of this document is to provide guidance on the Safety Tier Classification of contract work. The two Safety Tier Classifications are as follows:

Safety Tier 1 – A designation assigned to contracted work activities that are high risk and, without implementation of appropriate safety measures, are potentially hazardous or life threatening.

Safety Tier 1 Higher-Risk – Safety Tier 1 Higher-Risk (HR) Contractors are Safety Tier 1 contractors who perform work for SCE that are subject to serious injuries or fatalities if behaviors and/or work practices deviate from established safety protocols and best practices. Safety Tier 1 HR contractors are those performing work scopes that have historically experienced a higher volume and severity of incidents on SCE property.

Safety Tier 2 – A designation assigned to contracted work activities that are lower risk or routine in nature and not typically considered hazardous. (Examples include non-boom type concrete pumping, biological monitoring, use of small power tools, janitorial work, etc.)

If the contractual work includes any of the following, it is considered **Safety Tier 1**:

- a. Operations above six feet that require the use of fall protection system(s)
- b. Welding and cutting operations
- c. Electrical work and work involving installation, operation, or maintenance of an electrical system circuit, or line, with the exception of changing light bulbs and equipment that can be serviced while unplugged
- d. Work requiring hazardous energy control and lock-out, tag-out procedures
- e. Work that involves cranes, hoisting, and rigging
- f. Work involving the loading/unloading of trucks and trailers using power equipment
 - i. NOTE: drivers must not be involved with the loading, unloading of equipment with the exception of load securement. If they are actively engaged in the loading process, then they shall also be considered Safety Tier 1 Contractors
- g. All aircraft operations to perform lifting and hoisting
- h. Work involving air operations (e.g., aircraft utilized for LiDAR and unmanned drones)
- i. Work involving operation of heavy equipment
- j. Tree work including maintenance and removal operations that require the use of aerial lifts
- k. Confined space activities
- l. Radiographic testing or any activity that could generate ionizing radiation
- m. Roofing work
- n. Demolition work
- o. Excavation or other work that requires a dig permit
- p. Work that may require permitting from Cal/OSHA or other regulatory agencies
- q. Work requiring the use of explosives
- r. Work that may involve lead-based paint or asbestos-containing materials
- s. Work involving hazardous material use, transport, or disposal (to include refrigerants)
- t. Work involving environmental/hazardous material cleanup and decontamination
- u. Work that requires the installation, operation, or maintenance of the electrical system
- v. Work covered by the Construction Safety Orders and or Fed OSHA Construction Standards

Safety Tier 1 HR contractors include any Contractor directly involved with the following SCE operations:

- a. High Voltage Electric Transmission and Distribution Contractors, including civil and electrical scopes of work

- b. Substation Construction and Maintenance Contracts
- c. Vegetation Management operations, including Line Clearance Tree Trimming, Hazard Tree Removal, and other similar scopes of work
- d. All Aircraft Operations including Helicopter Operations
- e. General contractors, owner engineer, and EPC-type contractors

This list is not all-inclusive. Contact Edison Safety for additional guidance as needed.

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