

# Enterprise Corrective Action Program Procedure

## SUMMARY

This utility procedure establishes the requirements for the enterprise-wide Corrective Action Program (CAP) process across lines of business (LOBs) at PG&E.

The purpose of CAP is to identify, evaluate, resolve, and track actual or potential issues, problems, failures, nonconformities, concerns, and opportunities for improvement (collectively, CAP issues) based on probability of occurrence. CAP is a risk-informed, risk-driven process by which the organization learns from equipment, programmatic, organizational, human performance issues and successes.

This procedure provides the framework to ensure personnel (collectively, employees and non-employees) concerns, process issues, unsafe conditions, operability issues, compliance and quality issues are promptly identified, evaluated, and either corrected or accepted as is.

The development and maintenance of the nuclear generation CAP process is governed by program guidance documents that specifically address Nuclear Regulatory Commission and nuclear insurer requirements. See Inter-Departmental Administrative Procedure (IDAP) OM7.ID1, "Problem Identification and Resolution" for specific guidance.

Level of Use: Informational Use

## TARGET AUDIENCE

This procedure applies to all personnel engaged in the enterprise-wide CAP when performing work under PG&E procedures and governance processes.

See Utility Standard GOV-6101S, "Enterprise Corrective Action Program Standard", section 4 for CAP Roles and Responsibilities.

## SAFETY

Following the requirements of this procedure demonstrates each LOB's commitment to PG&E's goal of improving employee, contractor, and public safety.

## BEFORE YOU START

COMPARE the publication date and version number on your working copy of the document against the published version in the Guidance Document Library to verify that it is current.

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### PROCEDURE STEPS

#### 1 Identify and Submit CAP Issue

##### 1.1 Initiator

1. SUBMIT only one issue per submission.
  - a. Each submission should only address one specific topic.
    - (1) SEE Utility Standard GOV-6101S Appendix A, “Example of Issues to Report”.
  - b. Existing PG&E reporting solutions should continue to be used as intended.
    - (1) SEE Utility Standard GOV-6101S Appendix B, “Other Reporting Solutions”.
  - c. REPORT an issue as soon as practical.
  - d. REPORT an issue, even if it is resolved, for tracking and trend analysis.

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- e. IF there is doubt about the need to submit an issue:  
THEN SUBMIT the issue.

**NOTE**

CONTACT the LOB CAP team for assistance if sensitive or protected information must be included in the CAP issue prior to issue submission.

2. Do not enter any of the following information in an issue:
- a. Inappropriate language or content PER [Utility Manual CDT-1001M, "Code of Conduct for Employees"](#).
  - b. Personally Identifiable Information (PII) PER [Utility Standard GOV-8001S "Privacy Standard"](#).
  - c. Employee Record Information PER [Utility Standard HR-2001S, "Employee Files and Records Standard"](#).
  - d. Confidential or Restricted information PER [Utility Standard IT-5302S, "Information Classification and Protection Standard"](#).
  - e. Protected Health Information (PHI) PER [Utility Manual HR-1106M, "PG&E HIPAA Privacy Manual"](#).
  - f. Conduct Discipline PER [Utility Standard HR-5001S, "Conduct Discipline Standard for Support, Professional, and Leadership Employees"](#).
3. REPORT the issue using one of the following methods:
- a. CAP Website, "Submit an Issue" found at <http://CAP/>.
  - b. CAP mobile solutions (CAP App and CAP Full Site).
  - c. CAP Helpline at [REDACTED]
  - d. CAP Help Desk Email [REDACTED]@pge.com)
  - e. Fill out CAP issue paper submission form (See GOV-6101S, "Enterprise Corrective Action Program Standard", Attachment 1, "Issue Paper Form") and route through company mail to the address on the bottom of the form.
  - f. SAP utilizing:
    - (1) All users: "[REDACTED]" transaction code
    - (2) Gas personnel: "[REDACTED]" transaction code

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- (3) Power Generation personnel: "██████████" transaction code
4. IDENTIFY the organization best suited to take ownership of the issue.
5. ENTER a brief title to describe the issue.
6. ENTER a detailed description of the issue, including:
  - a. What and where is the issue?
    - (1) DESCRIBE the issue as clearly and concisely as possible, including the process of what should have occurred, any applicable guidance document(s), deviation from those document(s), and any potential or known consequences.
    - (2) PROVIDE the location of the issue when pertinent to the issue.
  - b. Who should be assigned to address this issue?
    - (1) RECORD the department or title of the individual who should be assigned to address the issue, if known.
  - c. How might this issue be avoided or solved?
    - (1) EXPLAIN what may have caused the issue, and the basis for the assumption, and provide any suggestions or information on how the issue could be resolved, if known.
    - (2) DOCUMENT immediate and completed actions taken, if any.
7. PROVIDE enough information to allow for appropriate issue follow up and assignment.

**NOTE**

SEE 1.12 above for guidance on information that should not be included in the CAP issue.

8. IF supporting documents or evidence such as photographs, procedures, or other documentation (i.e. gas map correction form, etc.) can provide understanding and / or assistance with resolving the issue:  
  
THEN ATTACH the supporting document(s) or evidence to the issue.
9. COMPLETE any additional fields if information is known (example: issue type, subtype division/district, etc.).
10. REQUEST the issue owner to contact the Initiator prior to issue closure, if desired.

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### NOTE

Anonymous Initiators will need to save the CAP issue number generated on submission to track submission results as they will NOT receive status email updates, follow-up questions or access to rate their satisfaction on how the CAP issue was closed.

11. WHEN reporting an issue anonymously, ‘  
  
THEN the initiator must INCLUDE enough descriptive information so that appropriate follow-up action can be taken.

## 2 Review, Categorize, and Risk Assess

### 2.1 LOB CAP Specialist

1. REVIEW CAP issue submissions within two business days of receipt.
  - a. Exceptions to this requirement must be approved by the LOB CAP process owner.
2. ENSURE the issue has enough information, facts, and descriptive detail to allow reviewers to understand and follow-up on the issue.
  - a. IF additional information is needed to support risk assessment or assignment of the issue:  
  
THEN OBTAIN the information AND UPDATE the CAP issue.
  - b. IF unable to obtain additional issue information:  
  
THEN USE LOB CAP specialist and CRT judgment for issue review.
3. IF there are multiple CAP submissions for initial identification of the same issue,  
  
THEN the LOB CAP team and/or the CRT may recommend that the issues be combined, and subsequent issues be closed or to the reference issue.
4. IF the issue submission has any inappropriate information as defined in step 1.12 above,  
  
THEN one or more of the following may occur:
  - a. TRANSFER the issue to the appropriate reporting solution for disposition
    - (1) EDIT the information from the CAP system
    - (2) CLOSE the issue to the other reporting solution PER step 2.6 below.

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- b. OR EDIT the inappropriate information while leaving the intent of the issue intact,
    - c. OR APPLY the “Protected” status to the issue in the CAP system.
  5. PREPARE the CRT meeting agenda and CRT package.
  6. DISTRIBUTE the CRT meeting agenda and CRT report to attending CRT members.
  7. PUBLISH the CRT meeting agenda and CRT package to the LOB CAP website or otherwise make them available to CRT for review.

### 2.2 LOB CAP Specialist and/or LOB CRT Member

1. REVIEW the CRT meeting agenda and CRT Report in preparation for the CRT meeting.
2. REVIEW each CAP issue in the CRT report for understanding, including:
  - a. Issue Title and Description.
  - b. Any additional information provided.
  - c. Any actions created.
  - d. Any attachments included.
  - e. IF additional information is required,  
THEN contact the issue initiator.
3. ASSIGN a CAP risk level using CRT judgement and Safety or Quality management personnel recommendations.
  - a. USE Appendix A, CAP Risk Matrix Tool
  - b. USE Appendix B, Operational Risk Determination Decision Tree
  - c. USE Appendix H, Severity Level Examples by LOB
  - d. Safety personnel can recommend the risk level of issues related to safety incidents, observations or other assessments.
  - e. Quality Management (QM) personnel can recommend the risk level of issues from official compliance oversight activities (i.e. audits, tests, inspections, assessments) submitted by QM.

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- f. CAP issue risk may also be determined based on another documented company program or process that establishes risk for specific program or process related issues.
4. DOCUMENT the rationale used to determine the recommended CAP risk level.
5. REVIEW AND UPDATE the CAP issue type and sub-type as appropriate.
6. REVIEW AND UPDATE any additional fields as appropriate.
  - a. IDENTIFY attributes to CAP issue, if known or as applicable.
7. RECOMMEND an evaluation type considering the assignment on the level of associated risk to safety, reliability, financial impact, compliance, environment, and reputation.
  - a. SEE the following for additional guidance when recommending an evaluation type:
    - (1) [Utility Standard SAFE-1100S, "Serious Injury and Fatality \(SIF\) Standard."](#)
    - (2) [Utility Standard SAFE-1004S, "Safety Incident Notification and Response Management Standard"](#)
    - (3) Appendix E, Gas Operations Event Classification Matrix,
    - (4) Appendix F, Electric Operations Incidents and CE Type,
    - (5) Appendix G, Power Generation Events and CE Types

### NOTE

1. For issues that do not meet the criteria for serious safety incident (SSI), serious injury or fatality-actual (SIF-Actual) or serious injury or fatality-potential (SIF-Potential), evaluation type is determined by LOB management, LOB CAP team, LOB CRT team or the issue owners.
2. Cause evaluations are only required for issues that meet Safety criteria as described above. For all other CAP issues, including high and medium risk, a work group evaluation (WGE) or close to trend (CTRD) are acceptable evaluation types.

- b. Root Cause Evaluation (RCE)
  - (1) ASSIGN to all Serious Safety Incident (SSI) PER [Utility Standard SAFE-1004S, "Safety Incident Notification and Response Management Standard"](#).

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- (2) ASSIGN to all SIF-Actual incidents PER [Utility Standard SAFE-1100S, "Serious Injury and Fatality \(SIF\) Standard."](#)
- c. Apparent Cause Evaluation (ACE)
  - (1) ASSIGN to all SIF-Potential incidents PER [Utility Standard SAFE-1100S, "Serious Injury and Fatality \(SIF\) Standard"](#).
- d. Common Cause Evaluation (CCE)
  - (1) ASSIGN to identify common underlying elements between different, unique, but similar causes, issues or incidents.
- e. Work Group Evaluation (WGE)
  - (1) ASSIGN to an issue to perform a logical evaluation, not rising to the rigor of a CE, that requires a logical evaluation be performed to identify reasonable corrective or preventive actions needed to resolve an issue.
- f. Effectiveness Review
  - (1) ASSIGN only to issues created to implement an existing cause evaluation's effectiveness review plan.
  - (2) SEE [Utility Procedure GOV-6102P-06, "Cause Evaluation Process Procedure"](#) for guidance on when an effectiveness review plan is required.
- g. Close to Trend (CTRD)
  - (1) ASSIGN when the issue addressed in the CAP issue does not require any additional action or response.
  - (2) CLOSE issue and DOCUMENT basis for closure or allow the issue owner to validate as CTRD and close.

8. IDENTIFY potential trends.

9. IDENTIFY potential Eagle Eye Award candidates.

### 2.3 CRT Meeting

- 1. MEET on a basis defined by the LOB CAP process owner to review CRT packet.
- 2. GAIN CONSENSUS on pre-identified information from step 2.22.2 above.

### 2.4 LOB CAP Specialists Post-CRT



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1. UPDATE CAP issues reviewed during CRT meeting with any changes recommended by CRT.
  - a. INCLUDE risk rationale
  - b. INCLUDE justification for evaluation type selected
  - c. DOCUMENT any additional comments supporting the changes made during CRT.
2. IF during the CRT meeting the CRT members are unable to establish ownership of a CAP issue within the LOB organization, THEN:
  - a. PLACE the issue on hold for further follow-up.
  - b. INITIATE an issue transfer between LOB (See section 2.5), as needed.
3. DISTRIBUTE the CRT materials, as needed.

### 2.5 LOB CAP Specialist – Transfer Issue to another Organization (LOB)

1. IF the CRT recommends that an issue be owned by a different organization:
  - a. DOCUMENT the organization that should own the issue.
  - b. EXPLAIN why the organization suggested should own the issue.
  - c. INITIATE an organization transfer in the CAP system.
2. IF the transfer request is not accepted,  
  
THEN CONSULT with the LOB SMEs and other LOB CAP teams to identify appropriate ownership
  - a. INITIATE a new transfer in the CAP system, if needed.  
  
OR
  - b. PLACE the issue on hold pending additional information

### 2.6 Transfer Issues to other reporting solution

**NOTE**

SEE [GOV-6101S Appendix B, "Other Reporting Solutions"](#) for examples of other reporting solutions that should not be submitted to CAP.

1. Issues that will be transferred to another reporting solution should first be transferred to the organization that owns the other reporting solution.

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2. The LOB CAP specialist, issue owner or process designee will PERFORM the following:
  - a. INFORM the CAP initiator of the status of the CAP issue.
  - b. SUBMIT the issue from CAP into the appropriate reporting solution to address the issue.
  - c. ENSURE the issue is traceable in the new reporting solution.
  - d. DOCUMENT the new reporting solution
  - e. DOCUMENT the new issue tracking reference value.
  - f. CHANGE status of the CAP issue to “Other Reporting Solution”.
  - g. CLOSE the CAP issue.

### 2.7 Escalation Process

1. IF the CRT team is unable to establish ownership of a CAP issue within the LOB organization or another LOB via the transfer process within one week following the CRT review, THEN:
  - a. PLACE the issue on hold.
  - b. NOTIFY the LOB CAP process owner.

**NOTE**

The decision to escalate the issue ownership discussion to the executive leadership team is based on agreement between the LOB CAP Process Owner, associated LOB management team member(s) and/or enterprise CAP director.

2. ESCALATE issue ownership agreement discussion to the LOB management team.
  - a. SCHEDULE discussions or meetings with managers, directors, CAP initiator and any company officer (as needed) that is associated with the issue.
  - b. INCLUDE stakeholder procedures related to the issue.
  - c. CONSIDER including the enterprise CAP manager or director in discussions or meetings to achieve final ownership.
  - d. DETERMINE ownership for the CAP issue.
3. IF issue ownership is not achieved by the LOB management team,  
THEN ESCALATE issue ownership discussion to the LOB executive leadership team.

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- a. SCHEDULE discussion or meeting with the executive leadership team or designated alternates.
- b. ESTABLISH ownership for the CAP issue.

### 3 Accepting and Assigning the CAP Issue

3.1 The Department Owner is responsible for accepting and assigning the CAP issue.

1. REVIEW the issue within five business days of the CRT assignment.
2. IF the issue was assigned to the appropriate department, THEN:
  - a. REVIEW the existing issue owner assignment OR
  - b. ASSIGN the CAP issue to the appropriate issue owner by entering the LAN ID of the CAP issue owner.
  - c. ACCEPT the issue.
3. IF the CAP issue assignment is not accepted, THEN:
  - a. DOCUMENT the justification as why the CAP issue does not belong to the department
  - b. NOTIFY the LOB CAP team for reassignment.

3.2 The Issue Owner is responsible for REVIEWING the CAP issue AND IDENTIFYING any classification changes.

1. IF the CAP issue requires a change in risk level THEN:
  - a. NOTIFY the LOB CAP team process owner for approval to adjust the risk level.
  - b. DOCUMENT the justification as to why the CAP issue risk level needs to change and recommended risk level within the CAP issue.
2. IF the CAP issue requires a change in evaluation type, THEN
  - a. REFER to
    - (1) [Utility Standard GOV-6102S, "Enterprise Cause Evaluation Standard"](#)
    - (2) [Utility Standard SAFE-1100S, "Serious Injury and Fatality \(SIF\) Standard."](#)
    - (3) [UTILITY Standard SAFE-1004S, "Safety Incident Notification and Response Management Standard".](#)

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- b. NOTIFY the LOB CAP team process owner for approval to adjust the evaluation type.
    - c. DOCUMENT the justification as to why the CAP issue evaluation type needs to change and the recommended evaluation type within the CAP issue.
  3. REVIEW the CAP issue description for understanding.
    - a. IF additional information is required ,  
THEN CONTACT the initiator, if known.
  4. REVIEW the issue due date AND DETERMINE if the CAP Issue requires a due date change.
    - a. Issues may remain in an overdue status.
    - b. Issues can be closed with an overdue due date.
  5. IF the issue requires a due date change,  
THEN SEE subsection 7 below.

### 4 Perform an Evaluation

#### 4.1 Issue Owner

1. FOR high-risk issues,
  - a. DEVELOP AND IMPLEMENT interim actions within 8-24 hours
    - (1) Interim actions must mitigate the risk of the issue until the cause evaluation and corrective actions are completed.
  - b. DOCUMENT the action(s) in the CAP issue.
2. IF an RCE, ACE, CCE, WGE or Effectiveness Review has been assigned, THEN:
  - a. PERFORM the evaluation PER [Utility Procedure GOV-6102P-06, "Enterprise Cause Evaluation Process Procedure"](#).
3. IF close to trend is assigned:
  - a. VERIFY that no further action is required to address the issue.
  - b. COMPLETE issue per section 5.11 below.
4. IF an extent of condition has been recommended, THEN

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- a. EVALUATE the extent of condition to determine if the identified issue exists, or may exist, with other processes, human performance or equipment as described in [Utility Manual GOV-6102M, "Cause Evaluation Manual"](#).
- b. DOCUMENT the findings, causes, and corrective or preventive actions as required by [Utility Procedure GOV-6102S, "Enterprise Cause Evaluation Standard"](#).

### 5 Resolving an Issue

**NOTE**

SEE step 1.12 above for guidance on information that should not be included in the CAP issue.

#### 5.1 Issue Owner

1. IF the assigned issue should be close to trend,  
THEN ENSURE the following steps are performed and recorded in the CAP system:
  - a. DOCUMENT the basis for close to trend
  - b. COMMUNICATE the decision to the issue initiator.
  - c. CONTACT the LOB CAP team to request a status change.

**NOTE**

Low risk and level 5 issues that do not require additional action can be closed by the issue owner with justification for closure.

2. SEE [Utility Procedure GOV-6102P-06, "Enterprise Cause Evaluation Process Procedure"](#) for guidance on performing a CAP evaluation and resolving the CAP issue.
3. IF actions are generated,  
THEN ENSURE each action includes:
  - a. Action title and the detailed description.
  - b. Action owner's LAN ID and department.
  - c. Planned start date and planned finish date.
4. VERIFY the issue's due date is realistic and achievable for the developed action plan(s).
  - a. Action due dates can NOT exceed the issue due date.

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- b. UPDATE the issue due date as necessary PER subsection 7 below.

### 5.2 Action Owner

1. COMPLETE the actions assigned by the issue owner.
2. IF the agreed action due date needs to be extended:  
THEN CONTACT the issue owner to AUTHORIZE the extension.
3. DOCUMENT the actions taken in the CAP system.
  - a. ENSURE that the documentation is detailed enough to provide justification of completion. INCLUDE:
    - (1) A detailed closure statement of the actions taken to address the issue.
    - (2) The date the action was completed.
  - b. PROVIDE a reference to any documents that detail the actions taken, when applicable.
    - (1) SEE Appendix D, Closure Documentation Guidance for Corrective Actions for recommended information to include when closing actions.
4. REVIEW action taken with the issue owner for agreement.
5. COMPLETE the action in the CAP system.

### 5.3 Issue Owner - Verify Completion of Corrective Actions

1. REVIEW the action(s) completed by the action owner.
2. VERIFY that the action(s) are complete and appropriately documented,
3. ENSURE inappropriate information is not included in the action per step 1.12 above.
4. VERIFY that supporting references such as photographs, revised procedures, or other documentation are attached to the issue, or otherwise traceable.
5. IF the action does not meet action assignment requirements,  
THEN INITIATE a new CAP action.

### 5.4 Issue Owner – Complete the Issue

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### NOTE

CAP issues cannot be closed until all CAP Actions have been completed.

1. ENSURE justification is documented if no action is taken, and/or if the issue owner determines that the issue will not be resolved at this time.
2. ENSURE there are traceable references that can be retrieved by others for high and medium risk issues.
3. ENSURE inappropriate information is not included in the action (SEE step 1.12 above).
4. CONTACT the initiator to discuss the closure and actions taken, if requested.
5. CLOSE the CAP issue in the CAP system.

### 6 Long Term Corrective Actions (LTCAs)

6.1 To be classified as an LTCA, the required action completion time to resolve the CAP issue should be projected to exceed 180 calendar days and one or more of the following criteria must be met:

1. A system or power outage is required to implement corrective action(s).
2. A long lead time is projected to manufacture or procure parts.
3. A design change per applicable design change process is required.
4. Training will take multiple training cycles to complete.
5. A significant programmatic change is required.
6. Actions depend upon a submittal that requires government agency response or approval.
7. PG&E processes reject authorization of funds in the current fiscal year.
8. Other actions that may be designated by the LOB director or above.

### NOTE

LTCAs approval does not need to escalate beyond the director unless required by another process.

6.2 LTCA should be approved by the director or above in the issue owner's organization and LOB CAP process owner.

1. Interim actions must be in place and documented in the CAP issue.

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2. DOCUMENT approval and rationale supporting the LTCA designation in the CAP issue (REFER to step 6.1 above).

- 6.3 IF a CAP issue has been recommended for LTCA designation:

THEN CONTACT the LOB CAP team.

### 7 Due Date assignments and changes.

- 7.1 IDENTIFY the appropriate issue due date.

1. The Issue Owner should

- a. DISCUSS the CAP issue with the applicable stakeholders, for example:

- (1) Department Owner
- (2) Cause Evaluator
- (3) Action Owner(s)
- (4) CAP Specialist(s)
- (5) LOB Leadership

- b. DETERMINE the time required to evaluate the issue, if appropriate.
- c. DETERMINE the time required to complete all actions.
- d. CONSIDER other on-going or upcoming work and priorities which may impact timely closure of the CAP issue.
- e. ENSURE the selected due date is realistic.
- f. ENSURE the selected due date is timely.

- (1) IF issue resolution requires significant time to complete,

THEN consider creating interim actions to mitigate risks until corrective actions can be put in place.

- 7.2 REVIEW due date extension approval criteria

1. The issue owner must DETERMINE the age of the CAP issue based on the Issue Submission date.
2. For Issues submitted less than or up to 45 days of submission,



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THEN the CAP issue due date change must be APPROVED AND DOCUMENTED as follows:

- a. High and Medium Risk Issues:
  - (1) Due dates set 1 - 180 days from initiation require no approval.
  - (2) Due dates set 181 - 365 days from initiation require manager approval.
  - (3) Due dates requested beyond 365 days from initiation require director approval.
- b. Low Risk and Level 5 Issues:
  - (1) Due dates set 1 - 365 days from initiation require no approval.
  - (2) Due dates set 366 - 730 days from initiation require manager approval.
  - (3) Due dates requested beyond 730 days from initiation require director approval.

3. FOR issues submitted more than 45 days of submission,

THEN the LOB SVP must approve due date changes for all CAP issues.

- a. IF the LOB does not have an SVP

THEN the LOB EVP must approve the due date change.

### 7.3 Requesting an approval

1. UPDATE the CAP issue with the requested due date change AND PROVIDE the following:
  - a. Current Due Date
  - b. Proposed Due Date
  - c. Background of the issue
  - d. Justification for the new due date

### 7.4 Due Date extension approval

1. The LOB SVP or EVP is responsible for REVIEWING AND RESPONDING to all due date extension requests.
  - a. This responsibility CANNOT be delegated to another individual.

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2. The LOB SVP or EVP must REVIEW the due date extension request within 7 days of request submission.
  - a. UPDATE the assigned CAP action with approval or disapproval.
  - b. PROVIDE additional feedback or comments in the action description field.
    - (1) IF the request was disapproved,  
THEN additional feedback or comments are required.

### 7.5 Documenting the new due date

1. IF the request was approved,  
THEN the CAP system will automatically update the issue due date.
2. IF the request was not approved,  
THEN the issue due date will remain unchanged.

## 8 Quality Closure Review (QCR)

### 8.1 LOB CAP Team

1. REVIEW CAP issues completed each month for quality.

#### NOTE

Any portion of CAP issues not predesignated for QCR by the review minimum and other management review process will be randomly selected.

- a. REVIEW, at a minimum:
  - (1) 100% high risk issues
  - (2) 100% medium risk issues
  - (3) 50% low risk issues
  - (4) Level-5 issues do not require QCR.
2. VERIFY issues meet quality closure review criteria (SEE Appendix C, Quality Closure Criteria for CAP Issues)
  - a. Issue is well defined.
  - b. Extent of condition is considered, when applicable.

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- c. Issue is not closed to a promise.
  - d. Actions taken are clearly documented.
  - e. Justification is provided if no action is taken.
3. DOCUMENT QCR results by adding the appropriate attribute code(s) to the CAP issue.
4. IF closure is not satisfactory:
  - a. INFORM the issue owner that closure was unsatisfactory.
  - b. RE-OPEN the CAP issue, if required.
  - c. EXTEND the issue due date to allow issue owner to take necessary action as needed.

### 9 Effectiveness Review

- 9.1 REFER to [Utility Procedure GOV-6102P-06, "Enterprise Cause Evaluation Process Procedure"](#).

### 10 Trending

#### 10.1 LOB CAP Team

1. PERFORM periodic review of CAP issues on a frequency defined by the LOB CAP process owner.
2. PROVIDE results to management, which should include the following information:
  - a. The time frame being reviewed.
  - b. A list of potential or actual adverse trends that warrant attention.
  - c. A summary statement documenting the results of the review.
3. INITIATE a new CAP issue if needed to address potential adverse trends.

### END of Instructions

### DEFINITIONS

Refer to the "Definitions" section of [Utility Standard GOV-6101S, "Enterprise Corrective Action Program Standard"](#) and [Utility Standard GOV-6102S, "Enterprise Cause Evaluation Standard"](#).

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### IMPLEMENTATION RESPONSIBILITIES

ECAP manager ENSURES this procedure complies with [Utility Standard GOV-6101S, "Enterprise Corrective Action Program Standard"](#),

LOB CAP process owners ENSURE that their employees are aware of and comply with the requirements of this procedure.

Employee(s) identified and held accountable by the organization for fulfilling specific responsibilities described in this procedure may DELEGATE their responsibilities to others; however, they are accountable for the final results.

### GOVERNING DOCUMENT

[Utility Standard GOV-6101S, "Enterprise Corrective Action Program Standard"](#).

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

### COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

#### Regulatory Commitments

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

#### Records and Information Management:

Information or records generated by this procedure must be managed in accordance with the Enterprise Records and Information (ERIM) program Policy, Standards and Enterprise Records Retention Schedule (ERRS). SEE Utility Standard [GOV-7101S, "Enterprise Records and Information Management Standard"](#) and related standards. Management of records includes, but is not limited to:

- Integrity
- Storage
- Retention and Disposition
- Classification and Protection

### REFERENCE DOCUMENTS

#### Developmental References:

- Corporation Policy GOV-01, "Records Management Policy"
- [Utility Standard GOV-6101S, "Enterprise Corrective Action Program Standard"](#)
- [Utility Standard GOV-6102S, "Enterprise Cause Evaluation Standard"](#)

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- Utility Standard SAFE-1004S, “Serious Incident Investigation Standard”
- Utility Standard SAFE-1100S, “Serious Injury and Fatality (SIF) Program Standard”
- [Utility Procedure GOV-6102P-06, “Enterprise Cause Evaluation Process Procedure”](#)

### Supplemental References:

- Utility Standard GOV-8001S, “Privacy Standard”
- Utility Standard IT-5302S, “Information Classification and Protection Standard”
- [Utility Manual GOV-6102M, “Cause Evaluation Manual”](#)

### APPENDICES

Appendix A, CAP Risk Matrix Tool

Appendix B, Operational Risk Determination Decision Tree

Appendix C, Quality Closure Criteria for CAP Issues

Appendix D, Closure Documentation Guidance for Corrective Actions

Appendix E, Gas Operations Event Classification Matrix

Appendix F, Electric Operations Incidents and CE Type

Appendix G, Power Generation Events and CE Types

Appendix H, Severity Level Examples by LOB

### ATTACHMENTS

N/A

### DOCUMENT REVISION

GOV-6101S-B001, “CAP Due Date Extension Process Bulletin”

### DOCUMENT APPROVER

██████████, Director, Enterprise Corrective Action Program.

### DOCUMENT OWNER

██████████, Manager, Enterprise Corrective Action Program

### DOCUMENT CONTACT

██████████, Manager, Enterprise Corrective Action Program

## Enterprise Corrective Action Program Procedure

### REVISION NOTES

Where?	What Changed?
1.11.a	New reference to GOV-6101S Appendix A
1.11.b	New reference to GOV-6101S Appendix B
1.12	Updated formatting
	Inserted hyperlinks
2.1	Removed note.
2.13	Removed option to cancel issue
2.2	Added detailed steps for CAP team and CRT members to review issues
2.41	Include new steps to document risk rationale, CE justification and additional comments to support CRT recommendations.
2.61	New note referencing GOV-6101S, Appendix B
2.62	Added additional steps for transferring an issue to another reporting solution.
2.71	Time requirement to escalate reduced to 1 week.
3.1	Removed note stating issue will be automatically accepted.
3.12	Changed formatting
3.2	New step specifying Issue Owner responsibilities
3.22	Added references to see when requesting an evaluation type change.
3.22.b	New step
3.22.c	New step
3.23	New step
3.25	Removed details for due date extension approval. Refer to section 7 instead.
4.11.a	Removed "mitigating action".
4.12	Refer to GOV-6101P-06.
4.14	Changed to state what to do if an extent of condition has been recommended without mentioning who makes the recommendation.
5.11	New instructions for resolving issues which are close to trend.
<b>Error! Reference source not found.</b>	Removed detailed instructions for resolving issue based on CE type. Now refers to GOV-6101P-06 for further information.
5.23.b	Add reference to Appendix D. Removed information that is already captured in appendix D.
7	New section. Contains information previously found in GOV-6101S-B001.
Appendix A, CAP Risk Matrix Tool	New appendix. Replaced previous Appendix A (Examples of issues to report)
Appendix B, Operational Risk Determination Decision Tree	New appendix. Replaces previous Appendix B (Other Reporting Solutions)

## Enterprise Corrective Action Program Procedure

Appendix C, Quality Closure Criteria for CAP Issues	Updated quantity for review.
Appendix E, Gas Operations Event Classification Matrix	Updated appendix with new matrix.
Appendix F, Electric Operations Incidents and CE Type	New appendix.
Appendix G, Power Generation Events and CE Types	New appendix.
Appendix H, Severity Level Examples by LOB	New appendix.

## Enterprise Corrective Action Program Procedure



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**Appendix A, CAP Risk Matrix Tool**  
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SEVERITY	FREQUENCY →	D	C	B	A
		Rare Once every 10+ years	Possible Once every 2-10 years	Likely 1 - 3 times per year	Almost Certain > 3 times per year
1	<b>Catastrophic</b> - One of the following <u>should be considered</u> : 1. Fatality or Serious Injury (SIF Actual) or Employee injury requiring 24-hour hospitalization (other than observation) 2. Catastrophic damage to critical asset(s) 3. Widespread loss of service 4. Financial loss ≥ \$50M 5. Pipeline or facility shut down by regulatory agency 6. Catastrophic environmental effect 7. Extended national / international media coverage 8. Beyond self-report capabilities (Compliance issue)	High	High	High	High
2	<b>Major</b> - One of the following <u>should be considered</u> : 1. Lost Time Injury or many minor injuries or SIF Potential 2. Major damage to critical asset(s) 3. Limited loss of service 4. Financial loss ≥ \$5M 5. Regulatory penalty/legal action results in fine within financial loss range, NOV-1 6. Widespread environmental effect 7. Extended state media coverage 8. Significant recurring program, process or compliance gap	Medium	Medium	High	High
3	<b>Moderate</b> - One of the following <u>should be considered</u> : 1. Recordable Injury or few minor injuries or Significant Safety Concern 2. Damage/degradation of critical asset(s) 3. Threat to continuity of service 4. Financial loss ≥ \$500K 5. Warning letter, audit results in fine within financial loss range, NOV-2 6. Localized environmental effect 7. Local / Limited state media coverage issue 8. Systemic recurring program, process or compliance gap	Low	Medium	Medium	High
4	<b>Minor</b> - One of the following <u>should be considered</u> : 1. First Aid or Safety Concern or Near Hit 2. Limited or no damage to assets 3. No threat to continuity of service 4. Financial loss ≥ \$50K 5. Self-reported Inspection, Audit, or QC Finding or Regulator identified violations with no fines or penalties. 6. Limited or no environmental effect 7. Limited local or no media coverage 8. Potential recurring program, process or compliance gap	Low	Low	Low	Low
5	<b>Nominal</b> - One of following <u>suggested or tracked</u> : 1. Safety 2. Asset / Equipment 3. Reliability 4. Affordability 5. Compliance 6. Environmental 7. Customer / Government Relations 8. Business Related / Other / Project Management	<b>Level 5 issues are items which may need to be addressed but typically have nominal impact to safety, reliability, compliance, quality, environmental or finance. These include improvement suggestions, business issues, and tracking work activities all not requiring a risk determination.</b>			

**Severity Level 1 – Catastrophic:** Event results in catastrophic impact and a repeat occurrence cannot be tolerated. Presents high risk and consequences to safety and reliability

**Severity Level 2 – Major:** Event results in major impact, and a repeat occurrence either must be minimized or cannot be tolerated. The event or finding presents/potentially presents high risk and consequences to safety and reliability.

**Severity Level 3 – Moderate:** Event results in moderate impact and a repeat occurrence must be minimized. The event or finding presents/potentially presents medium risk and consequences to safety and reliability.

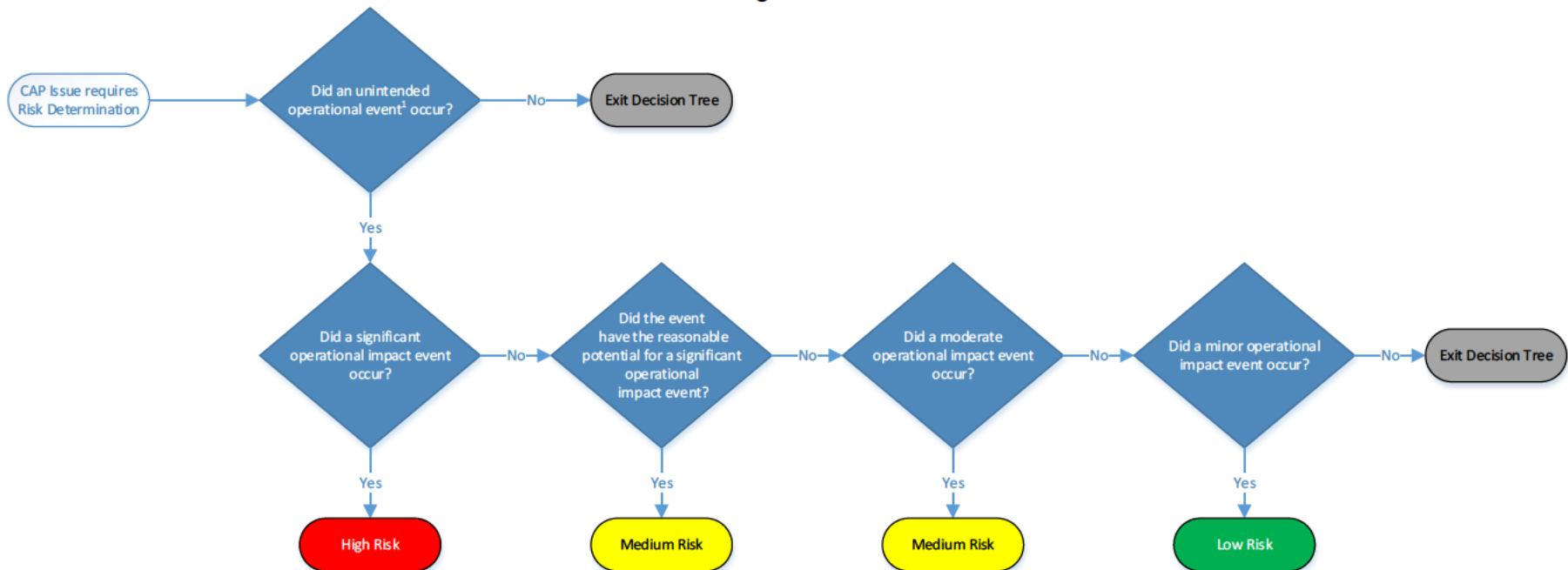
**Severity Level 4 – Minor:** Event results in minor impact and a repeat occurrence can be tolerated. The event or finding presents/potentially presents low risk and consequences to safety and reliability.

**Severity Level 5 – Nominal:** Level 5 issues are items that may need to be addressed but typically have nominal impact to the company. These issues may include improvement suggestions, administrative issues, and tracking work activities that do not require risk determination.

**Enterprise Corrective Action Program Procedure**

**Appendix B, Operational Risk Determination Decision Tree**

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<sup>1</sup> An unintended operational event is an unforeseen event that impacted or has the potential to impact the following:

- the safety of the public or our workforce
- the integrity of PG&E's assets
- the reliability of energy delivery
- our financial performance
- our compliance with standards and regulations
- damage to the environment
- the company's reputation.

## Enterprise Corrective Action Program Procedure

### Appendix C, Quality Closure Criteria for CAP Issues

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#### QUALITY CLOSURE CRITERIA FOR CAP ISSUES

Each month, 100% of high risk issues, 100% of medium risk issues, and 50% of low risk issues are reviewed for quality closure by the LOB CAP teams. The following section describes the criteria utilized by CAP team members to determine quality CAP issue closure. The criteria are specified in GOV-6101S, "Enterprise Corrective Action Program Standard."

1. Issue is well defined.

The issue being resolved is clearly stated in the issue description/long text.

2. The extent of condition is considered, if applicable.

For issues where there is a reasonable probability that the issue exists and poses a risk in other areas, an extent of condition analysis should be performed.

The extent of condition examines the extent to which the actual condition exists, or may exist, with other equipment, processes, or human performance. The results of this analysis should be documented in the issue description/long text. Justification should be provided if an extent of condition analysis is not conducted.

#### **NOTE**

Issues being documented, tracked and managed in another recognized program can be closed to another reporting solution. Closure documentation of the issue should include the name of the program the issue is being tracked in, as well as a traceable reference number generated from the new reporting solution.

3. The issue is not closed to a promise.

Corrective actions cannot be closed to a future completion target. Actions are considered outstanding until the action has been performed. All corrective actions must be completed at time of issue closure. Completed issues in CAP documenting another company approved solutioning process and unique identifier for tracking is acceptable.

4. Actions taken are clearly documented.

Actions taken to address the issue should be clearly documented in either the action description field, or in the issue description/long text field. This includes a description of the action, the outcome upon action completion, the position title of the individual performing the action and the date the action was completed. Supporting evidence such as photographs, revised procedures, or other documentation should be attached to the issue.

## Enterprise Corrective Action Program Procedure

### Appendix C, Quality Closure Criteria for CAP Issues

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5. Justification is provided if no action is taken.

If the conclusion of the issue evaluation is that the issue cannot or will not be addressed, provide a detailed explanation and supporting evidence for how this conclusion was reached.

## Enterprise Corrective Action Program Procedure

### Appendix D, Closure Documentation Guidance for Corrective Actions

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#### **CLOSURE DOCUMENTATION GUIDANCE FOR CORRECTIVE ACTIONS**

Closure documentation of corrective actions should have a closure statement that explains what action was taken, and how that action meets the intent and requirement of the corrective action. Document only the actions taken to address the corrective action, DO NOT include information such as additional enhancements not related to the actual corrective action description.

References to records archived should have the complete unique document number of the record in the closure documentation for traceability so it can be retrieved by the reviewer. The closure statement should identify the specific plan, standard, procedure or work order step that implements the corrective action.

Closure documentation, including attachments, entered in CAP should not contain personal or confidential information.

- IF identified, such information will be redacted
- OR the issue marked as “protected” in the CAP system

#### **NOTE**

When reviewing the issue or actions for closure, the issue owner should include the CAP issue initiator, if possible, as part of the process to ensure that the actions taken have addressed the issue.

#### **RECOMMENDED OBJECTIVE EVIDENCE FOR CORRECTIVE ACTION CLOSURES**

There can be supporting documentation that provides objective evidence that the action was completed as written such as roster sheets, training materials, email communications, project records, procedure excerpts, etc.

Documents provided as objective evidence can be attached in.pdf format to the specific action they satisfy. Documents as objective evidence should contain the following:

- A file name or document title
- Issue number so it is traceable to the issue.
- A scanned copy of the document page(s) with the information highlighted or bubbled.
- Final signatures, approvals and dates.

A draft document is not evidence of closure.

**Enterprise Corrective Action Program Procedure**

**Appendix E, Gas Operations Event Classification Matrix**  
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Gas Event Classification Matrix						
UNINTENDED OPERATIONAL EVENTS <sup>1</sup>						
Investigation Level <i>May be escalated or deescalated by Leadership as necessary</i>	PIPELINE HIT, RUPTURE, or EXPLOSION	PRESSURE EVENTS (Over and Under Pressure)	OTHER LOSS OF CONTAINMENT EVENTS	OTHER OPERATIONAL EVENTS	SAFETY	OTHER QUALITY/COMPLIANCE EVENTS
Significant Operational Events <i>Root Cause Evaluation (RCE)</i>	<ul style="list-style-type: none"> <li>Transmission pipeline damage with loss of containment</li> </ul>	<ul style="list-style-type: none"> <li>Overpressure event with loss of containment or overpressure event that impacts over 200 customers</li> <li>Loss of service to over 2000 customers</li> </ul>	<ul style="list-style-type: none"> <li>Explosion or fire due to loss of containment that impacts PG&amp;E's or customer's property (i.e. house explosion)</li> </ul>	<ul style="list-style-type: none"> <li>Loss of odorant (outside of regulatory limits) at customer lines</li> <li>Loss of system wide visibility (SCADA)</li> <li>Other events that significantly impact the safety, reliability, or integrity of the pipeline system</li> </ul>	<ul style="list-style-type: none"> <li>SIF-Actual Events<sup>3</sup></li> <li>Serious injury or fatality to the public due to gas asset failure or operational change</li> </ul>	<ul style="list-style-type: none"> <li>No new event types defined</li> </ul>
Moderate Operational Events <i>Apparent Cause Evaluation (ACE)</i>	<ul style="list-style-type: none"> <li>Transmission pipeline damage with no loss of containment</li> <li>Distribution asset loss of containment resulting in fire</li> </ul>	<ul style="list-style-type: none"> <li>Large overpressure event with NO loss of containment<sup>2</sup></li> <li>Unintentional loss of service to 200-2000 customers (excludes non-at-fault dig-ins)</li> <li>Reasonable potential loss of service to over 2000 customers (i.e. unintended closure of valves, blockage in pipeline)</li> </ul>	<ul style="list-style-type: none"> <li>Significant gas accumulation within explosive limit due to loss of containment without appropriate safeguards</li> <li>Other loss of containment events (i.e. lube oil, pipeline liquids) with moderate impact</li> </ul>	<ul style="list-style-type: none"> <li>Loss of odorant (outside of internal limits) at customer lines</li> <li>Potential loss of system wide visibility (SCADA)</li> <li>Over-odorization of gas resulting in an increase in customer odor calls</li> <li>Loss of visibility to multiple mountain tops (SCADA) for 4 hrs or more</li> <li>Other events that had the reasonable potential to significantly impact the safety, reliability, or integrity of the pipeline system</li> </ul>	<ul style="list-style-type: none"> <li>SIF-Potential Events<sup>3</sup></li> <li>Potential for serious injury or fatality to the public due to gas asset failure or operational change</li> </ul>	<ul style="list-style-type: none"> <li>Mandated self-reports</li> <li>NOV and NOPV findings requiring ACE as determined by regulatory compliance</li> </ul>
Minor Operational Events <i>Work Group Evaluation (WGE)</i>	<ul style="list-style-type: none"> <li>At-fault dig-in on a distribution asset without fire or explosion</li> </ul>	<ul style="list-style-type: none"> <li>Small overpressure event or near-hit overpressure event<sup>2</sup></li> <li>Loss of service to less than 200 customers (excludes non-at-fault dig-in)</li> </ul>	<ul style="list-style-type: none"> <li>Loss of containment with low likelihood of fire or explosion</li> </ul>	<ul style="list-style-type: none"> <li>Crossbore created during construction or maintenance activities</li> </ul>	<ul style="list-style-type: none"> <li>Non-SIF injuries</li> </ul>	<ul style="list-style-type: none"> <li>High Quality Assurance Findings</li> <li>Self-reported non-conformances</li> <li>NOV findings</li> </ul>

1= An unintended operational event is defined as an event resulting from work at/for PG&E involving gas assets that impacted or had the potential to impact the following: the safety of the public or our workforce (employees and contractors); the integrity of gas assets; the reliability of gas delivery; normal operations of the gas system; compliance with standards and regulations. \*Does not include 3<sup>rd</sup> party at-fault events or natural disasters.

2 = Small and large overpressure events are defined by FIMP.

3 = All workforce serious injuries or fatalities actual and potentials are determined using process and definitions in SAFE-1100S. Serious injuries are life-threatening or life-altering injuries.

## Enterprise Corrective Action Program Procedure

### Appendix F, Electric Operations Incidents and CE Type

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**NOTE**

Per Electric Incident Investigations: For wildfire incidents, an "Event Analysis Report" is performed which follows the cause evaluation methodology but is NOT a cause evaluation

Incidents	CE Type
NOV & Self-Report	ACE/WGE
Non-Compliance (severe)	RCE by request

## Enterprise Corrective Action Program Procedure

### Appendix G, Power Generation Events and CE Types

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#### NOTE

The events and risks below are general recommendations. The Power Generation CARB maintains discretion to initiate various Cause Evaluations as deemed appropriate.

#### High Risk – Root Cause Evaluation (RCE)

- Major equipment failure resulting in a prolonged unplanned generation outage
- Regulatory Notice of Violation (NOV) resulting in significant fines or legal action
- Significant hazardous chemical release with environmental impacts
- Catastrophic dam structure failure causing major flooding/damage

#### High/Medium Risk – Apparent Cause Evaluation

- Equipment failure resulting in limited unplanned generation outage
- Regulatory Notice of Violation (NOV) with no fines or penalties
- Uncontrolled hazardous chemical release with moderate environmental impact
- Temporary loss of SCADA/Telemetry with minimal impact to operations



## Enterprise Corrective Action Program Procedure

### Appendix H, Severity Level Examples by LOB

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This table should be utilized as a guide for determination and assignment of severity levels. This is not intended to be an all-encompassing list of issues.

Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
<b>Category 1 - Safety</b>				
1. SIF event	1. Potential SIF event 2. Trend in recordable injuries (>X recordable injuries per 10,000 hours worked) 3. SPMVI	1. Recordable Injury 2. Trend in First Aid Injuries (>X first aid injuries per 10,000 hours worked) 3. PMVI	1. First Aid Injury 2. Personnel not using proper PPE.	

## Enterprise Corrective Action Program Procedure

### Appendix H, Severity Level Examples by LOB

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Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
<b>Category 2 – Gas Operations</b>				
<ol style="list-style-type: none"> <li>1. SIF-Actual Events or Serious injury or fatality to the public due to gas asset failure or operational change</li> <li>2. Loss of containment, with ignition and explosion resulting in public safety issue</li> <li>3. Loss of service to over 2000 customers</li> <li>4. Requires significant funding, redirection of current budget. \$50M or more and/or board of director approval, GRC inclusion.</li> <li>5. Regulatory violation resulting in company impact and fines, legal action over \$1M</li> </ol>	<ol style="list-style-type: none"> <li>1. SIF-Potential Events or Potential for serious injury or fatality to the public due to gas asset failure or operational change</li> <li>2. Overpressure event with loss of containment or overpressure event that impacts over 200 customers or transmission pipeline damage with loss of containment with no ignition or distribution asset loss of containment resulting in fire.</li> </ol>	<ol style="list-style-type: none"> <li>1. Recordable injury or few minor injuries or significant safety concern</li> <li>2. Small overpressure event or near-hit overpressure event or At-fault dig-in on a distribution asset without fire or explosion</li> <li>3. Unintentional loss of service to less than 200 customers (excludes dig-in or dig-in/leak response related)</li> <li>4. Financial impact between \$500K and \$5M</li> </ol>	<ol style="list-style-type: none"> <li>1. First Aid Injury or Safety Concerns; Ergo concerns, PPE issues.</li> <li>2. Limited or no damage to assets or potential asset impact; damaged pipeline markers, shallow distribution services, OP Near Hit, meter protection, overbuilds, cathodic protection issues, paved over valves.</li> <li>3. Minor project changes that could impact return to operation date</li> <li>4. Cost overrun of &lt;\$50k; Error in cost accounting;</li> </ol>	<p>Enhancement / betterment CAPs that may need to be addressed but typically have no significant impact to safety, reliability, compliance, quality, environmental or finance.</p> <p>These include improvement suggestions, business issues, and tracking work activities all not requiring a risk determination.</p>

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### Appendix H, Severity Level Examples by LOB

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Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
<b>Category 2 – Gas Operations</b>				
<p>6. Environmental Event with substantial negative impacts requiring long term remediation and public health impacts (i.e. Natural gas reservoir well failure).</p> <p>7. National Media (*GO will rarely use this due to #1-#5 will likely trigger the media event).</p> <p>8. Other events that significantly impact the safety, reliability, or integrity of the pipeline system.</p>	<p>3. Unintentional loss of service to 200-2000 customers (excludes dig-in or dig-in/leak response related) or reasonable potential loss of service to over 2000 customers (i.e. unintended closure of valves, blockage in pipeline).</p> <p>4. Financial impact between \$5M and \$50M and within GO budget control.</p> <p>5. Regulatory/Compliance issue related to GO only. Notice of violation. Significant impact to compliance confidence, risk, and reputation (i.e. loss of odorant outside of internal limits)</p>	<p>5. Mandated self-reports. Warning letter Minor impact to compliance confidence, risk, and reputation</p> <p>6. Environmental event with localized impact</p> <p>7. Local media coverage.</p>	<p>5. Self report or regulatory findings with no fines or penalties; records issues including map corrections, audit findings, missed maintenance, ATF field design change, HCA/Ground patrol.</p> <p>6. Hazardous materials not secured properly, incomplete or faded labeling, minor housekeeping remediation not requiring reporting.</p> <p>7. Customer complaints posted on social media; local official makes public statements critical of PG&amp;E.</p>	

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### Appendix H, Severity Level Examples by LOB

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Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
<b>Category 2 – Gas Operations</b>				
	<ul style="list-style-type: none"> <li>6. Environmental event with negative impacts requiring remediation and limited public health impacts (i.e. spills and releases within PG&amp;E facility.</li> <li>7. State/Regional media coverage.</li> <li>8. Other events that had the reasonable potential to significantly impact the safety, reliability, or integrity of the pipeline system where barriers or controls were missing.</li> </ul>		<ul style="list-style-type: none"> <li>8. Guidance documents are unclear, conflicting, or out of date. Additional findings from CEs.</li> </ul>	

## Enterprise Corrective Action Program Procedure

### Appendix H, Severity Level Examples by LOB

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Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
<b>Category 3 - Electric Operations</b>				
<ol style="list-style-type: none"> <li>1. Fatality or Serious Injury (SIF Actual) or employee injury requiring 24-hour hospitalization (other than observation)</li> <li>2. Major electrical asset failure causing outage impacting more than 10,000 customer or customer minutes</li> <li>3. Workforce caused unintended outage (not following procedures/switching error) affecting more than 1000 customers or more</li> <li>4. Equipment failure or human cause leading to an ignition (plus spread).</li> </ol>	<ol style="list-style-type: none"> <li>1. Lost Time injury or minor injuries or SIF Potential</li> <li>2. Major electrical asset failure causing outage impacting between 10,000 and 1,000 customers or customer minutes</li> <li>3. Workforce caused unintended outage (not following procedures/ switching error) affecting 1000 - 500 customers</li> <li>4. Equipment failure or human cause leading to an ignition (no spread)</li> <li>5. Uncontrolled release of energy of any electrical equipment not impacting public safety</li> </ol>	<ol style="list-style-type: none"> <li>1. Recordable injury or few minor injuries or significant safety concern</li> <li>2. Electrical failure causing outage impacting 1-999 customer or customer minutes</li> <li>3. Workforce caused unintended outage (not following procedures/ switching error) affecting less than 500 customers</li> <li>4. Organization revision of enterprise guidance or job procedures</li> <li>5. Potential non-compliance event (not following procedures)</li> <li>6. Financial impact between \$500K and \$5M</li> </ol>	<ol style="list-style-type: none"> <li>1. First Aid or Safety Concern or Near Hit</li> <li>2. Limited or no damage to electrical assets</li> <li>3. Workforce caused unintended outage (not following procedures/ switching error) not affecting any customers</li> <li>4. Self-reported Inspection, Audit or QC Finding or Regulator</li> <li>5. Financial Impact between \$50K and \$500K</li> <li>6. Environmental event with localized impact that is immediately correctable or contained within small area.</li> </ol>	<p>Enhancement / betterment CAPs that may need to be addressed but typically have no significant impact to safety, reliability, compliance, quality, environmental or finance.</p> <p>These include improvement suggestions, business issues, and tracking work activities all not requiring a risk determination.</p>

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### Appendix H, Severity Level Examples by LOB

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Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
<b>Category 3 - Electric Operations</b>				
5. Uncontrolled release of energy of any electrical equipment impacting public safety 6. Requires revision of enterprise guidance or job procedures 7. Event that results in a self- report/NOV 8. Root Cause CAPRs and CAs transferred from another LOB CAP system. 9. Loss of SCADA that impacts PSPS, Wildfire mitigation efforts, or 500KV transmission operability 10. Major leak or spill beyond utility right-of-way	6. Electric Operations revision of enterprise guidance or job procedures 7. Loss of SCADA that impacts the ability to remotely monitor and control equipment but does not impact PSPS, Wildfire mitigation efforts, or 500kv transmission operability 8. Minor leak or spill beyond utility right-of-way 9. Non-conformance/ non-compliance event 10. Financial impact between \$5M and \$50M and within EO budget control.	7. Environmental event with localized impact requiring remediation of a few months. 8. Large fire: A fire that burns 300 or more acres but does not meet the definition of a Destructive or Catastrophic fire	7. Small fire: A fire that burns fewer than 300 acres	

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### Appendix H, Severity Level Examples by LOB

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Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
<b>Category 3 - Electric Operations</b>				
11. Requires significant funding, redirection of current budget. \$50M or more and/or board of director approval, GRC inclusion. 12. Environmental Event with substantial negative impacts requiring long term remediation (minimum of 2 years) and public health impacts. 13. Catastrophic fire: A fire that destroys 100 or more structures and results in a serious injury or fatality.	11. Environmental event with negative impacts requiring remediation (more than a few months and up to 2 years) and limited public health impacts. 12. Destructive Fire: A fire that destroys 100 or more structures but does not result in a serious injury or fatality			

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### Appendix H, Severity Level Examples by LOB

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Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
<b>Category 4 - Information Technology</b>				
1. Catastrophic or enterprise-wide loss of Tier 1 or Tier 2 systems. The duration of the event would also be used to determine severity.	1. Major or business-unit loss of Tier 1 or Tier 2 systems. The duration of the event would also be used to determine severity.	1. Moderate or regional loss of Tier 1 or Tier 2 systems. The duration of the event would also be used to determine severity.	1. Minor or localized loss of Tier 1 or Tier 2 or Tier 3 systems. The duration of the event would also be used to determine severity.	1. Nominal loss of Tier 3 or lower systems. The duration of the event would also be used to determine severity.



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### Appendix H, Severity Level Examples by LOB

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Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
<b>Category 5 – Power Generation</b>				
Enterprise Impacting	PG-ALL Impacting	PG – Regional/Local Impacting	Program/Process Improvements – General	Tracking,Trending, Routine/Recurring
1. Safety - Significant safety/public safety concern with enterprise impacts (e.g. Dam failure requiring evacuation, road closures, high media attention, and multi-agency emergency response. Emergency Operations Center - EOC and/or EAP – emergency action plan, triggered).	1. Safety – Significant to PG but without implications across enterprise (e.g. roads, fences, vandalism). 2. Assets – Failures limited to PG only impacts. 3. Reliability -Mis operations originating with PG but with Transmission or Distribution op consequences of a significant (but not CASIO or WECC) level.	1. Safety/First Aid – Lost time injury or requiring medical attention beyond First Aid. 2. Asset – Failure of an asset or system requiring a project-level effort for repair or replacement. Local storm or fire related events. 3. Service/Reliability – Events leading to a forced or unplanned outage status with CAISO. System protection other operating systems malfunctions.	1. Safety - Bug bite; Poor Lighting in work area; unsatisfactory housekeeping. Failure to comply with or misunderstanding of safety rule, PPE. Missing hazard tape or other control. Manageable fix-its from audit findings. Incomplete JSA/JHA. 2. Asset - Limited damage or degradation of system component. 3. Service/Reliability - Changes to project plan causing rework	1.

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### Appendix H, Severity Level Examples by LOB

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Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
<b>Category 5 – Power Generation</b>				
Enterprise Impacting	PG-ALL Impacting	PG – Regional/Local Impacting	Program/Process Improvements – General	Tracking, Trending, Routine/Recurring
2. Assets - Catastrophic failure of major generating equipment or management or protection system (generator, turbine, transformer, valve, spillway, penstock, IT). 3. Reliability - System, state, or western states grid blackout (black start conditions). 4. Financial - Requires significant funding, redirection of current budget over \$5M Utility Standard PM-1004S* – Project and Program Delegation of Authority Standard	4. Financial – Under 5M and within PG Op & Main budget control per PM-1004s* 5. Regulatory/Compliance related to PG only. Notice of violation. Significant impact to compliance confidence, risk, and reputation. Puts operating license at risk. 6. Environmental – Spills and releases with PG EOC impacts, (e.g. floods, landslides, instream releases impacting a region or regions within PG).	4. Financial- 200K – 1M financial loss 5. Regulatory/Compliance- regulatory violation that carries no fines or delay in operations. 6. Environmental – Minor environmental incident or violation that requires reporting but that can be remediated quickly. i.e. oil spill under 10 gallons, Stormwater Turbidity, etc.	4. Regulatory/Compliance - Incomplete regulatory submittal requiring rework; improper record-keeping methods; unclear signage. 5. Environmental - Hazardous materials not secured properly, incomplete or faded labeling, minor housekeeping remediation not requiring reporting. Minor fix-it's from audit findings.	

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Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
<b>Category 5 – Power Generation</b>				
Enterprise Impacting	PG-ALL Impacting	PG – Regional/Local Impacting	Program/Process Improvements – General	Tracking, Trending, Routine/Recurring
5. Regulatory - Resulting in company impact and fines, legal action over 1M 6. Environmental - Event with substantial negative impacts requiring long term remediation and public health impacts. 7. Media - National Media (*PG will rarely use this due to #1-#5 will likely trigger the media event). 8. EOC CAP with immediate impact. Requires revision of enterprise (policies, standards, procedures, organizational structure, management).	7. Media – State/Regional coverage. 8. Program/Process - EOC CAP with PG impact. Requires revision of enterprise (policies, standards, procedures, organizational structure, management).	7. Media – Negative press in local/regional newspaper or TV station (excluding “Letters to the Editor”) 8. Program/Process – Improvement to process would lead to lower cost, more efficiency, or higher reliability.	6. Media/Gov’t Relations - Customer complaints posted on social media; local official makes public statements critical of PG&E. 7. Program/Process - Guidance documents are unclear, conflicting, or out of date. Additional findings from CEs.	

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Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
<b>Category 6 - Finance</b>				
<ol style="list-style-type: none"> <li>1. Violation from a Regulatory agency (local, state, or federal) for non-compliance (financial or legal) with either which incurs a fine and/or financial penalty. Examples include violation from the SEC, IRS.</li> <li>2. OSHA Violation (safety), multiple in one year.</li> <li>3. SOX Control Violation – severe deficiency, based on intention to fraud (the Company - reported to the External auditors and the Board) (SOX also has a threshold matrix of classification by deficiency level of control, significant, material).</li> </ol>	<ol style="list-style-type: none"> <li>1. Re-filing of any reports with a regulatory agency with potential fine or penalty (either self-report, or agency requests).</li> <li>2. SOX Control Deficiency – severe deficiency, based on unintentional error/ requires report to internal auditors and the Board)</li> </ol>	<ol style="list-style-type: none"> <li>1. Any filing or activity related to financial or legal, with the potential to result in a known penalty or fine. External Regulatory identified Non-compliance: SOX violation.</li> <li>2. SOX Significant – deficiency, based on unintentional error, based on financial level for income statement or balance sheet. The SOX team developed the criteria.</li> </ol>	<ol style="list-style-type: none"> <li>1. Internal Policies and Procedures non-compliance: 2 or more occurrences.</li> <li>2. SOX – failed/deficiency</li> </ol>	<ol style="list-style-type: none"> <li>1. Internal policies and procedures non-compliance, one occurrence in a year.</li> <li>2. Process Improvement (e. g. suggestions for system change to Finance applications)</li> <li>3. Updating a GDM to clarify a procedure or standard</li> <li>4. Providing information on how a process works (e.g. submitting time, resolving a payroll error)</li> <li>5. SOX pass with deficiencies (SOX control was basically followed, but improvements to the control or evidence is identified).</li> </ol>

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Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
<b>Category 7 – Aviation</b>				
1. Aircraft has accident that results in serious injury or fatality or substantial damage to aircraft. Any event that would result in NTSB investigation. SIFA	1. Aircraft incident that meets reporting criteria to NTSB. Helicopter Rotor Strike, Helicopter dropped load at receiving site. Foreign object damage to aircraft, SIFP	1. Aircraft occurrence that results in unplanned landing, Mechanical issue inflight causing diversion. FAA reportable for UAV, Bird strike inflight with minor damage	1. UAV contact with fixed objects	

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Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
Category 8 - CRESS				
<ol style="list-style-type: none"> <li>1. Catastrophic disaster at a mission critical site leaving the facility inaccessible for all. Recovery time: months.</li> <li>2. Catastrophic power loss and back-up power failure at a mission critical site.</li> </ol>	<ol style="list-style-type: none"> <li>1. Significant damage to a mission critical site from a disaster, leaving the facility inaccessible for occupants, but accessible to Building personnel &amp; structural engineers. Recovery time: weeks.</li> <li>2. Significant impact from power loss &amp; back-up power failure at a mission critical site.</li> </ol>	<ol style="list-style-type: none"> <li>1. Mission Critical or Business Critical site damaged from event – earthquake, contained fire, etc., but still accessible to facilities personnel and structural engineers.</li> <li>2. Potential power loss and back-up power failure, including potential data loss. Recovery time: hours or days.</li> <li>3. Hazardous spill of Facilities' stored chemicals or fuel into storm drains, and clean-up.</li> </ol>	<ol style="list-style-type: none"> <li>1. Mission Critical or Business Critical site damaged from event – earthquake, contained fire, etc., but still accessible to all.</li> <li>2. Potential power loss and back-up power engaged, including potential data loss. Recovery time: hours.</li> <li>3. Hazardous spill of Facilities' stored chemicals or fuel but contained onsite, and clean-up.</li> <li>4. General Building Maintenance – Plumbing, Electrical, Flooring, Lighting, Painting, Janitorial, HVAC, General Repairs</li> </ol>	<p>Facilities maintenance suggestions, complaints, quality of service, questions.</p>

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Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
<b>Category 9 – Customer Care/Physical Security</b>				
<ol style="list-style-type: none"> <li>1. SIF Event</li> <li>2. Actual NERC-CIP data loss</li> <li>3. Customer data breach</li> <li>4. Catastrophic disaster at a mission critical site leaving the facility inaccessible for Customer Service and Customer Operations. Recovery time: days.</li> <li>5. Catastrophic power loss and back-up power failure at a mission critical site.</li> </ol>	<ol style="list-style-type: none"> <li>1. Potential SIF</li> <li>2. Potential NERC-CIP data loss</li> <li>3. Threat of physical harm to field personnel</li> <li>4. Unauthorized access to critical sites</li> </ol>	<ol style="list-style-type: none"> <li>1. Unauthorized access to physical non-critical sites.</li> <li>2. Interactions at site locations where law enforcement involvement is required.</li> </ol>	<ol style="list-style-type: none"> <li>1. First Aid Safety Concern or Near Hit – No loss of work time.</li> <li>2. Regulatory/Audit findings that are late or incorrect.</li> </ol>	<ol style="list-style-type: none"> <li>1. Process improvement suggestions.</li> <li>2. Near hits</li> </ol>

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Severity Level 1 Catastrophic	Severity Level 2 Major	Severity Level 3 Moderate	Severity Level 4 Minor	Severity Level 5 Nominal
<b>Category - 10 Strategy &amp; Policy</b>				
<ol style="list-style-type: none"> <li>SIF Event</li> <li>Catastrophic (system wide) damage to UOG or PPA generation resulting in CAISO Market disruption.</li> <li>Financial impact greater than &gt; \$50M</li> <li>Catastrophic UOG or PPA shutdowns due to regulatory, external agency or Level 4 Emergency Event.</li> <li>Widespread loss of customer load due to Wildfire, PSPS, Winter Storms resulting in loss of generation or load, disruption to CAISO Market.</li> </ol>	<ol style="list-style-type: none"> <li>Potential SIF Event</li> <li>Significant (multi-unit) damage to UOG or PPA generation potentially resulting in CAISO Market disruption.</li> <li>Financial impact greater than &gt; \$5M</li> <li>Major UOG or PPA shutdowns due to regulatory, external agency or Level 3 Emergency Event. NOV-1</li> <li>Significant loss of customer load due to loss of transmission or distribution due to a Wildfire, PSPS, Winter Storms resulting in loss of generation or load, potential disruption to CAISO Market.</li> </ol>	<ol style="list-style-type: none"> <li>Recordable (moderate) Injury – DART, OSHA. Loss of work time.</li> <li>Localized (individual unit) damage to UOG or PPA generation resulting in potential CAISO Market disruption.</li> <li>Financial impact greater than &gt; \$500K (non-payments to contracts or agencies) – potentially based on a regulatory audit or finding.</li> <li>Warning Letter - Actual or Non-Compliance event resulting in notification from Regulatory Agency. NOV-2</li> </ol>	<ol style="list-style-type: none"> <li>First Aid Safety Concern or Near Hit – No loss of work time.</li> <li>Financial impact greater than &gt; \$50K (non-payments to contracts or agencies)</li> <li>Self-reported – Regulatory Audit Findings / Supplemental Regulatory Filings.</li> <li>Guidance Documents Standards Out of Date.</li> <li>Contract or Regulatory Payment Errors – Human Factor</li> <li>Compliance - Late or incorrect Regulatory Reports or Filings – Findings.</li> </ol>	<ol style="list-style-type: none"> <li>Safety – BCP or Group Emergency Plans out of date.</li> <li>Internal Compliance Issue – Non-Regulatory</li> <li>Advice Letter Filings</li> <li>Guidance Document Process or Procedures Out of Date.</li> <li>Contract or Regulatory Payment Errors – Technical.</li> <li>Late or incorrect Regulatory Reports or Filings – Non-Findings.</li> </ol>



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<b>Category - 10 Strategy &amp; Policy</b>				
<p>6. Compliance - Inability to respond to any CAISO dispatches during Market Warning or Alert categories resulting in a violation or fine reaching the level of bullet #3.</p>	<p>6. Compliance - Inability to respond to some CAISO dispatches during Market Warning or Alert categories resulting in a violation or fine reaching the level of bullet #3.</p>	<p>5. Localized Wildfire, PSPS, Winter Storm resulting in potential loss of generation or load, disruption to CAISO Market.</p> <p>6. Compliance - Technical disruptions resulting in the Inability to respond to CAISO dispatches resulting in a violation or fine reaching the level of bullet #3.</p>		

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<b>Category 11 - Transportation</b>				
1. Mechanical Failure resulting in SIF (e.g., wheel off, brake failure, etc.) 2. System/Server unavailable resulting in unavailability of data needed to operate fleet	1. External Agency NOV or fine 2. System Issues related to data integrity	1. CHP Vehicle Maintenance Violations 2. Asset lacking proper equipment/tools.	1. Telematic Device Troubleshooting 2. Compliance Program Finding	1. Vehicle Modification Request Inadequate vehicle lighting