

Enterprise Records and Information Management Standard

SUMMARY

This standard establishes requirements for Records and Information, roles, and responsibilities for managing and governing Records and Information at PG&E corporation and its subsidiaries, including Pacific Gas and Electric Company (together, PG&E).

This standard applies to Records and Information created, modified, utilized, maintained, stored, archived, retrieved, transmitted and disposed of during the course of PG&E business, regardless of format.

For guidance on specific enterprise Records and Information Management (ERIM) program requirements refer to the following ERIM Standards:

- GOV-7102S, "Third-Party Management of PG&E Contractor Documents"
- GOV-7103S, "Enterprise Records and Information Management Disposition Standard"
- GOV-7104S, "Enterprise Records and Information Management Physical Records Standard"
- GOV-7105S, "Enterprise Records and Information Management Digitizing Physical Records Standard"
- GOV-7106S, "Enterprise Records and Information Management Mission-Critical (Vital) and Business-Critical Records Standard"
- GOV-7109S, "Enterprise Records and Information Management Minimum Systems Requirements Standard"
- GOV-7112S, "Enterprise Records and Information Management Corporate Archives Standard"
- GOV-7113S, "ERIM Electronic Information Management Standard"
- GOV-7114S, "Management of Copies: Maps, Drawings, Manuals, and Guidance Documents"
- GOV-7115S, "Electronic Communications Retention Standard"
- GOV-7116S, "PG&E Recording of Meetings Standard"

TARGET AUDIENCE

All PG&E employees and non-employee workers (together, personnel), including the Board of Directors who create and manage PG&E Records and Information.

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REQUIREMENTS**1 Overview**

Records and Information are created every day by business operations at PG&E regardless of format.

1.1 Information is a collection of Data that has been given value through analysis, interpretation, or compilation in a meaningful form. Information may be deemed a Record or a Non-Record.

1.2 A Record is a sub-set of information that is created, received, or maintained which documents business:

- Actions
- Transactions
- Decisions (including supporting documentation)
- Contractual, Legal, or Regulatory requirements or obligations
- PG&E Policies, Standards, and Procedures

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1.3 Records and Information can exist in a variety of formats, including but not limited to:

- Paper/Physical documents
- Emails
- Electronic documents (e.g., Microsoft Word documents, PDFs, spreadsheets, etc.)
- CAD files
- Data in databases
- Audio/Video files
- Photographs
- Microfilm

1.4 Non-Record:

A Non-Record refers to information that does not meet the definition of a Record. Examples of Non-Records include the following (in no particular order):

- Extra copies of Records (also called a “convenience file” or “convenience copy”)
- Drafts or preliminary versions prior to final version
- Catalogs, trade publications or similar reference material
- Blank forms or templates

2 Ownership

- 2.1 PG&E owns all Records and Information created, received and or used in the course of conducting business. All Information pertaining to PG&E’s business, no matter where they are located, are considered the property of PG&E.
- 2.2 PG&E reserves the right to access and review the content of any Records and Information created, stored, transmitted, or received using PG&E computers, devices, network systems or other resources. Employees and/or non-employee workers have no expectation to privacy in the content they create. REFER to GOV-8001S, “Privacy Standard”.

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- 2.3 External entities and third parties with custody and/or control of PG&E Records and Information MUST protect, preserve, and maintain information in accordance with relevant PG&E Standards. It is the responsibility of the LOB engaging a vendor or contractor to ensure that PG&E Records and Information held or managed by the vendor or contractor is handled in accordance with this Standard and the Enterprise Records Retention Schedule (ERRS). At the end of the relationship with the vendor or contractor, the business is responsible for ensuring the transfer of PG&E Records and Information back to PG&E. REFER to GOV-7102S, "Third Party Management of Contractor Documents Standard".

3 Line of Business (LOB) Responsibility and Accountability

- 3.1 Each LOB is accountable for managing PG&E Information and Records with integrity to ensure authenticity, reliability, and availability.
1. Information and Records should not be abandoned e.g., left in place, and MUST be managed (e.g., new owner identified, transferred, dispositioned, etc.) before a department move, an employee job change, or an employee departure.
 2. When Information and Records are determined missing or damaged, the business MUST remediate the Information and/or Records and any applicable processes.

NOTE

Self-reporting of non-conformance issues is required by certain agencies. The LOB is accountable and responsible to ensure compliance with these mandatory requirements. For guidance on when to self-report missing or damaged records, see GOV-1030S, "Self-Reporting Standard".

- 3.2 Each LOB is accountable for creating and maintaining Records that are complete, accurate, and verifiable.
- All LOB personnel are responsible for creating and maintaining Records that are complete, accurate, and verifiable
- 3.3 Each LOB is accountable for creating Record and Information Management (RIM) processes and/or including documented RIM components into existing Business processes that comply with ERIM Policy, Standards, and ERRS. Contact ERIM at Enterprise_RIM@pge.com for assistance if needed.
- 3.4 Each LOB is accountable for assigning individuals responsible for the day-to-day management of LOB Records.

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- 3.5 Each LOB is accountable for the completeness and accuracy of the LOB's Records within the PG&E Record Inventory.

NOTE

While ERIM is responsible for the day-to-day management of Records stored at PG&E's offsite storage facility, the LOB remains accountable for such records.

- 3.6 ERIM is accountable and responsible for managing PG&E Information and Records through their remaining lifecycle in the case of orphaned records (e.g., defunct or dissolved business function).

4 Retention and Disposition

- 4.1 The Enterprise Records Retention Schedule (ERRS) is the authoritative source that identifies PG&E's Records by category, indicating the length of time (retention period) they must be kept to satisfy legal and regulatory requirements and operational and business needs. See Attachment 1 – Enterprise Records Retention Schedule and Attachment 2 – Enterprise Records Retention Schedule-Nuclear to this Standard.
- 4.2 Disposition is the final action taken per the retention schedule or end of lifecycle of a Record or Information, including a Non-Record, which can include destruction, transfer to a third-party, or permanent preservation (archival). REFER to GOV-7103S, "Enterprise Records and Information Management Disposition Standard".

5 Storage and Accessibility

- 5.1 Physical Records **MUST** be stored on-site at PG&E owned or leased premises or in an ERIM approved off-site storage facility to ensure the accessibility, security, and physical integrity of the Records. REFER to GOV-7104S, "ERIM Physical Records Standard".
- 5.2 Physical Records created and in use at a remote location or removed from a PG&E facility to a remote location **MUST** be returned to a PG&E facility as soon as the Record is no longer needed to perform the business operation. REFER to GOV-7104S, "ERIM Physical Records Standard."
- 5.3 Electronic Records **MUST** be stored on PG&E approved devices, network systems, or approved third-party network systems unless otherwise mandated by a regulatory agency or law. REFER to GOV-7113S, "ERIM Electronic Information Management Standard".
- 5.4 Electronic Records **MUST** be stored in a format that is accessible and readable for the life of the Record. IF the Record requires special equipment or software to read the file, THEN, the special equipment or software **MUST** be available to read the file.

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6 Protection and Disclosure

- 6.1 Records MUST be protected and access restricted based on their assigned information classification level. REFER to IT-5302S, "Information Classification and Protection Standard".
- 6.2 Records MUST NOT be disclosed to outside parties (other than to PG&E's authorized contractors, vendors, suppliers, consultants, and agents who need access to such Records for the performance of their services to PG&E) except upon proper authorization by the Company pursuant to the applicable Policies and Standards governing such disclosure, or pursuant to a court order or subpoena or other applicable law. REFER to company Policies and Standards that apply to such disclosure, including, but not limited to, GOV-7102S, "Third-Party Management of PG&E Contractor Documents", IT-5302S, "Information Classification and Protection Standard", GOV-8001S "Customer Privacy Standard" and PG&E's Employee Code of Conduct.
- 6.3 Any subpoena, court order, or warrant received by PG&E personnel regarding the release of PG&E Records MUST be directed to the Law Department at LawSubpoenaDesk@pge.com prior to the release of any Records. REFER to LAW-1001P-01, "Service of Legal Papers Procedure".

7 Holds

- 7.1 A Hold (Legal Hold or Business Hold) suspends the disposition of Records and Non-Records pursuant to the ERRS or other relevant standards. During the time that a hold is in place, Records or Non-Records that are within the scope of the hold MUST NOT be destroyed, even if they met the retention period in accordance with the ERRS. For questions about Legal Hold contact DiscoveryTeam@pge.com; for questions about Business Hold, contact Enterprise_RIM@pge.com.
- 7.2 Individuals who have received a legal hold notice from the Law Department are accountable and responsible for complying with the legal hold per the instructions provided by Law. If any individual has received a legal hold notice from Law and has further questions, contact: DiscoveryTeam@pge.com.
- 7.3 Any PG&E employee or non-employee worker, including the Board of Directors, who is aware of a reasonably anticipated or pending audit, investigation, inspection, or litigation, MUST NOT alter, falsify, mutilate, cover up, dispose of, or destroy Records and Non-Records in any format, whether paper, sample, graphic, electronic, photo, print or any other format related to the matter being investigated or litigated even if a Hold Notice has not yet been sent.

8 Exiting Personnel

- 8.1 Upon an employee or non-employee worker's departure from PG&E, or transfer to a new position, the individual and their supervisor MUST review all Information (physical or electronic) generated, retained, and used by the departing individual to identify company Records or Non-Records with long-term business value. Sources that should be reviewed include but are not limited to: One drive, Email, Hard Drives, paper documents, etc. REFER to HR-2030F-01, "Departing Personnel Checklist Procedure and Forms".

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- 8.2 If Records are identified during the review process, they MUST be managed in accordance with the ERRS and GOV-7103S "ERIM Disposition Standard". The department is responsible and accountable for the Records they have created, and the Records should not move with transferring employees.
- 8.3 If the exiting employee or non-employee worker is subject to a Legal Hold, the exiting individual and their supervisor must identify and review any Records or Non-Records to determine if they are subject to a Legal Hold(s). Any Records or Non-Records subject to a Legal Hold MUST NOT be destroyed. If the exiting employee has any Records or Non-Records that are subject to a Legal Hold, contact the DiscoveryTeam@pge.com.
- 8.4 Any physical (e.g., paper) Non-Records identified through the review process that are not subject to Legal Hold MUST be destroyed by placing the document(s) in a PG&E approved shred bin.

9 Compliance

- 9.1 ERIM can perform a compliance assessment on any PG&E work process subject to ERIM Standards at any time. LOBs are required to participate at ERIM's request. ERIM schedules and performs the compliance assessments.
- 9.2 All LOBs are accountable and responsible for tagging appropriate Regulations with the Records and Information Management (RIM) Area of Compliance (AOC) within the MetricStream system. The LOB MUST document RIM regulations using the RIM AOC when updating, entering, or migrating new compliance regulations in MetricStream that have a Record component. For updating RIM regulations with the Records Management attribute in MetricStream, Refer to [RISK-4107P-01-JA07, "Regulatory RIM Requirements Compliance Management Job Aid"](#).

END of Requirements

DEFINITIONS

Business Hold: A temporary hold on the destruction of relevant Records and Information needed for the purposes of a business project, audit, or other activity that takes precedence over regularly scheduled disposition per the defined retention period in the ERRS.

Data: Data refers to the raw facts or figures that form the building blocks of information.

Disposition: For a record or non-record, the final action taken per the retention schedule or end of lifecycle, which can include destruction, transfer to a 3rd party, or permanent preservation (archival).

Enterprise Records Retention Schedule (ERRS): The ERRS is the authoritative source that identifies PG&E's Records by category, indicating the length of time (retention period) they must be kept to satisfy legal and regulatory requirements, operational and business needs.

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Information: Information is a collection of data that has been given value through analysis, interpretations or compilations in a meaningful form. Information may be deemed a record or a non-record.

Legal Hold: The process by which PG&E meets its duty to preserve information (including records and non-records) due to a pending or anticipated lawsuit, legal proceeding, or investigation, as required by law.

Non-Record: Information that does not meet the definition of a record such as: drafts, copies of records, drafts, catalogues, trade publications or similar reference materials, blank forms or templates.

Record: A record is defined as information, regardless of format, that is created, received, and maintained which document business actions, transactions, decisions, and/or contractual, legal, or regulatory obligations.

IMPLEMENTATION RESPONSIBILITIES

ERIM will:

- Provide advice and services to the LOBs to support compliance with this Standard.
- Assist in identifying adequate security and controls to support appropriate access to Records, including the approved off-site storage vendor.
- Facilitate timely and efficient retrieval of Records from PG&E approved off-site storage.
- Coordinate the disposition of Records based on retention periods as defined in the ERRS.
- Facilitate the review and revisions of the ERRS.
- Perform compliance assessments and monitor compliance for the ERIM Policy and referenced ERIM Standards.
- Develop and maintain the web-based Records & Information Management training.
- Maintain the ERIM Policy, Standards, Procedures, and ERRS.

LOB will:

- Develop, implement, and execute business processes to achieve compliance with ERIM requirements.
- Facilitate awareness of ERIM Policy, Standards, Procedures, and the ERRS.
- Collaborate with ERIM in support of Enterprise Records and Information initiatives.

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Law Department will:

- Provide legal support to ERIM, as appropriate.
- Initiate, manage, release, and provide legal guidance regarding legal holds.
- Conduct legal hold review and analysis of Records to be disposed.

IT will:

- Provide appropriate tools to implement the functionality necessary to support this standard.
- Provide appropriate security, internal controls, and tools for controlled, role-based access to protect electronic Records from unauthorized access and data alteration.
- Provide for appropriate back-up and recovery of electronic Records and Information.

GOVERNING DOCUMENT

[GOV-01, Enterprise Records and Information Management Policy](#)

COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

The California Public Utilities Commission, Internal Revenue Service, Securities and Exchange Commission ("SEC"), and other government regulatory agencies have established guidelines for maintaining specific, identified records. To ensure that PG&E complies with these requirements, record types identified by specific regulations and the number of years that records need to be maintained from the point of creation to the final disposition are set forth in the PG&E ERRS that accompany this Standard.

REFERENCE DOCUMENTS

Supplemental References:

- GOV-7102S, "Third-Party Management of PG&E Contractor Documents"
- GOV-7103S, "Enterprise Records and Information Management Disposition Standard"
- GOV-7104S, "Enterprise Records and Information Management Physical Records Standard"
- GOV-7105S, "Enterprise Records and Information Management Imaging Standard"
- GOV-7106S, "Enterprise Records and Information Management Mission-Critical (Vital) and Business-Critical Records Standard"

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- GOV-7109S, "Enterprise Records and Information Management Minimum System Requirements Standard"
- GOV-7113S, "ERIM Electronic Information Management Standard"
- GOV-8001S, "Privacy Standard"
- HR-2030F-01, "Departing Personnel Checklist Procedure and Forms"
- IT-5302S, "Information Classification and Protection Standard"
- ARMA International Generally Accepted Recordkeeping Principles[®]
- Glossary of Records Management and Information Governance Terms - ARMA International TR22-2016, which can be found on the ERIM Website.

APPENDICES

NA

ATTACHMENTS

- Attachment 1 – Enterprise Records Retention Schedule
- Attachment 2 – Enterprise Records Retention Schedule-Nuclear

DOCUMENT REVISION

NA

DOCUMENT APPROVER

██████████, Director, Enterprise Information Governance

DOCUMENT OWNER

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REVISION NOTES

Where?	What Changed?
Section 3	Revised 3.1 and added 3.1.1, 3.1.2, and Note to incorporate information from Section 9 Abandoned, Missing, or Damaged Records

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Section 5	Inserted new 5.2 and renumbered following sections
Section 9	Removed and incorporated content into Section 3 (see above change to Section 3)