

# **CORPORATE ENVIRONMENTAL, HEALTH AND SAFETY PROCEDURE**

**CEHSP A32.00 – Rules We Live By**

**Revision Date: 3/30/2022**

**Effective Date: 5/4/2022**

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## **1.0 PURPOSE**

This procedure establishes a consistent approach to communicating and reinforcing the importance of following critical safety work practices designed to protect employees, contractors, and the public.

## **2.0 APPLICABILITY**

This Corporate Environmental, Health and Safety Procedure (CEHSP) applies to all Con Edison employees and contractor employees .

## **3.0 INTRODUCTION**

There are safety and operational procedures specifically designed to protect against the potential for significant injury due to energy sources (e.g., electricity, gas, steam, or falling from an elevation) that must be controlled. Operating groups that work with these energy sources have identified Rules We Live By (RWLB). RWLB are work procedures or safety requirements that, if not followed, could result in a severe injury or fatality or create a significant risk to employees, contractors, or members of the public. When attending classes at -The Learning Center, the RWLB associated with a given activity of an operating department apply.

## **4.0 COMPLIANCE REQUIREMENTS**

### **4.1 RULES WE LIVE BY IDENTIFICATION, TRAINING, AND REPORTING**

#### **4.1.1 IDENTIFICATION**

When work tasks require the safe control of energy sources, the operating organization must identify procedures to control or mitigate the effect to the employee, fellow employees, contractor

employees, and the public. Operating organizations must consider lessons learned from previous incidents in the identification process.

If an organization changes a RWLB, the organization must notify the EH&S Director, Health and Safety of the change before the change is implemented.

#### **4.1.2 TRAINING AND COMMUNICATION**

Each operating organization is responsible for ensuring its employees are trained in the RWLB. This training includes:

- Providing each employee in the organization with OJT training on the RWLB.
- Reinforcing the organization's RWLB and associated procedures in skills training.
- Reinforcing the organization's RWLB in job briefings.
- Incorporating the organization's RWLB into the scope of safety field observations and inspections.

When contractor work practices involve RWLB, contractor employees will be trained on the applicable RWLB, reporting procedure, and consequences. The operating organization must communicate the applicable RWLB to contractor management and ensure the RWLB are incorporated in the eHASP. The contractor supervisor will be required to train their affected employees, including subcontractor employees, before they begin work.

#### **4.1.3 REPORTING AND INVESTIGATION**

If a RWLB violation is suspected or observed, all work must stop immediately.

If a non-supervisory employee believes a RWLB may have been violated, that employee must stop the involved work task immediately and report the situation to the supervisor of the employee who committed the alleged violation. If the supervisor of the employee who committed the alleged violation is not available, the employee must notify a supervisor in same department of the employee who committed the alleged violation or a supervisor in their department.

If a supervisor observes a RWLB being violated, that supervisor must stop the involved work task immediately.

Once work is stopped, the supervisor, the person who identified the alleged RWLB violation (if different), the employee who committed the alleged RWLB violation, and any other necessary persons (e.g., crew members or other supervisors who witnessed the alleged RWLB violation) must meet to discuss the alleged RWLB violation.

- If after discussing the alleged RWLB violation, everyone involved agrees that there is no RWLB violation, work can proceed.
- If after discussing the alleged violation, everyone involved agrees that there is a RWLB violation or if there is disagreement whether there is a RWLB violation, the supervisor must contact the EH&S representative to obtain assistance in resolving the alleged RWLB violation.

- If the EH&S representative cannot be reached, the job cannot continue until EH&S has addressed the issue. The operating organization can contact the EH&S Control Desk to assist in contacting another EH&S representative.

Once notified of the potential RWLB violation, the EH&S representative must respond in person to the location of the potential RWLB violation. The EH&S Representative must also notify the EH&S Director, Health and Safety of the potential RWLB violation as soon as possible after being contacted by the supervisor, but in no case later than when the EH&S Representative arrives at the location.

- The EH&S representative will act as the authority (expert) on health and safety rules, regulations, and procedures and will determine whether there has been a RWLB violation.
- If the EH&S representative cannot determine whether there has been a RWLB violation, the EH&S representative must contact a Subject Matter Expert (SME) from other areas of the company, including Engineering, EH&S Safety, or Operations, to assist help make a determination.
- The number of people involved in reviewing the allegations and making the RWLB determination should be kept to the minimum required to resolve the issue. The employee who observed the alleged violation should be included in the discussions to the extent necessary to ensure there is a clear understanding of the facts involved.
- If the EH&S Representative cannot make a determination (e.g., conflicting information or the alleged RWLB is not identified before work has stopped), then the EH&S Representative must notify the operating organization's supervisor that their organization must conduct a fact finding investigation.
- Once the operating organization identifies the facts, they must inform the EH&S Representative of their findings, and the EH&S representative will then make a determination.
- Once the EH&S representative understands all the issues involved in the alleged violation, the EH&S representative will determine whether there is a RWLB violation.
- The EH&S Representative will determine whether there is a RWLB violation as soon as practicable after understanding all the information, but no more than five business days after being notified of the alleged RWLB violation, unless additional fact finding by the organization is necessary. Based on the circumstances and complexity of the incident, the EH&S Director, Health and Safety may grant an extension of time.
- If additional fact finding by the organization is necessary for the EH&S Representative to make a determination, the EH&S Representative will determine whether there is a RWLB violation as soon as practicable after understanding all the information, but no more than five business days after receipt of the information from the organization. Based on the circumstances and complexity of the incident, the EH&S Director, Health and Safety may grant an extension of time.
- The EH&S representative must lead a close-out discussion with all parties involved, using three-way communication and ensuring that each party involved understands the determination.

- After the close-out discussion, the EH&S Representative must complete the RWLB Determination Report provided in Attachment 1.
- The EH&S Representative must distribute the RWLB Determination Report to the EH&S Director, Health and Safety, the supervisor, the person who identified the RWLB violation (if different), the employee who committed the RWLB violation, and the General Manager or Director of the employee who committed the RWLB violation.
- If the General Manager or Director of the employee who committed the RWLB violation disagrees with the EH&S Representative's determination, the General Manager or Director can appeal the determination to the EH&S Director, Health and Safety within three business days of receiving the Determination Report.
- If the determination is appealed, the EH&S Director, Health and Safety will decide whether there is a RWLB violation. The EH&S Director, Health and Safety's decision is final. (Attachment 2 is a Flowchart of the RWLB process)
- Only EH&S is authorized to make a positive RWLB determination.
- EH&S Operations is responsible to update the KPI reporting system on EH&S Central with the RWLB information.

## 4.2 VIOLATION OF A RWLB

A violation of a RWLB will result in significant consequences. The operating organization in which the RWLB violation occurred will be responsible for determining the discipline.

Any employee who witnesses a violation of a RWLB and does not stop the work and report the violation will also be considered to have violated the RWLB.

If a company contractor or sub-contractor violates a RWLB, the operating organization with contractor oversight must submit an action line.

The operating organization must notify the EH&S Director, Health and Safety after acting on the violation.

## 5.0 DEFINITIONS

**Con Edison employee:** This includes all management and union employees.

**Contractor employee:** This includes employees working for a contractor company hired by Con Edison, subcontractors, and per-diem contractor employees.

## REVISION HISTORY

<u>Revision Date</u>	<u>Revision #</u>	<u>Summary of Change</u>	<u>Author</u>
1/21/14	2013 Annual Review	<i>CEHSP A32.00.01 RWLB - Table:</i> Permits, Electric Ops – Added language to clarify that entry for work in structures containing d-faulted feeders is permissible after associated source equipment has been de-energized.	G. Slintak
4/23/14	2013, Revision 1	<i>CEHSP A32.00.01 RWLB - Table:</i> Adjusted high hazard PPE rule as applied to Gas Operations in response to 4/22 request. Change clarifies the attachment point for use of PPE (previously associated with “blowing gas,” a subjective term).	G. Slintak
5/16/14	2	Combined ‘CEHSP A32.00 – Rules We Live By’ and ‘CEHSP A32.00.01 – Rules We Live By Table’ into one document. The table will be an attachment to the procedure.	S. Ng
12/31/14	2014 Annual Review Rev. 3	Edits to reflect organization changes. Minor changes to clarify rules.	W. Capune
12/21/15	2015 Annual Review Rev. 4	Edits to reflect organizational changes in Shared Services. Customer Operations adopted the same language as Electric Operations for High Hazard PPE.	W. Capune
04/06/18	Annual Review Rev. 5	No changes requested. Removed the year (2016) from the RWLB Table. Additional editorial comments added by G.Slintak.	W. Capune
03/18/21	6	Removed reference to the Time Out procedure and outlined the determination process	McFarland
3/08/22	7	Inserted new rule for Customer Operations which requires proper testing of meters.	McFarland
3/30/22	8	Clarified requirements for notifications to EHS Safety and RWLB determination process  Added Determination Report template  Added “RWLB Process” flow chart  Added requirement for reporting through KPI System	E. Dessen M. McFarland T. McGee

Hazard	Electric Operations	Central Operations	Gas Operations	Customer Operations	Utility Shared Services
Verify Dead/Lockout-Tag Out	Properly test or spear to ensure that electric equipment, cable, or wire is "dead" as required regardless of voltage, before beginning dead work activities.	Properly test or verify that equipment is de-energized, isolated and protected prior to initiating dead work activities.		Conduct required testing, following the proper procedure for work on metering equipment	Properly lock out/tag out equipment before beginning work on the equipment. (when not intentionally live and PPE is required)
Permits (Operating, D-faults)	Enter D-Fault tagged structures only when authorized by the operating authority to perform feeder processing, or to perform work after all D-faults have been identified and de-energized.	<ul style="list-style-type: none"> <li>Only perform work that is within the authorized scope of work as listed on the work permit.</li> <li>Do not change the status of a piece of equipment that has a Stop Tag applied to it.</li> <li>Follow the sequence of an operating order.</li> </ul>		Do not enter a structure that has been classified and tagged as a D-fault.	Only perform work that is within the authorized scope of work as listed on the work permit
Atmospheric Testing	<ul style="list-style-type: none"> <li>Perform air monitoring and ventilate as required for entry and work in an enclosed space or a permit-required confined space.</li> <li>For excavations greater than 4 feet in depth the atmosphere shall be tested prior to entry or when the excavation is not already occupied.</li> </ul>	<ul style="list-style-type: none"> <li>Perform air monitoring and ventilate as required for entry and work in an enclosed space or a permit-required confined space.</li> <li>For excavations greater than 4 feet in depth the atmosphere shall be tested prior to entry or when the excavation is not already occupied.</li> </ul>	<ul style="list-style-type: none"> <li>Perform air monitoring and ventilate as required for entry and work in an enclosed space or a permit-required confined space.</li> <li>For excavations greater than 4 feet in depth the atmosphere shall be tested prior to entry or when the excavation is not already occupied.</li> </ul>	Perform air monitoring and ventilate as required for entry and work in an enclosed space or a permit-required confined space.	Perform air monitoring and ventilate as required for entry and work in an enclosed space or a permit-required confined space.
Rescue/Retrieval	Entrant and attendant are required to wear rescue harness when working in enclosed spaces.	Entrant and attendant are required to wear rescue harness when working in enclosed spaces.	Entrant and attendant working in enclosed spaces shall wear rescue harnesses, when required.	Entrant and attendant are required to wear rescue harness when working in enclosed spaces.	Entrant and attendant are required to wear rescue harness when working in enclosed spaces
High Hazard Energy PPE	<ul style="list-style-type: none"> <li>Use fall protection equipment as required.</li> <li>Use appropriate rubber gloves with protective gauntlets, rubber sleeves, fire retardant clothing and eye/protection face shield as required for the electrical hazard.</li> </ul>	<ul style="list-style-type: none"> <li>Use fall protection equipment as required.</li> <li>Use appropriate rubber gloves, rubber sleeves, fire retardant clothing, and eye protection/face shield as required for the electrical hazard.</li> <li>In Steam Distribution, use appropriate water resistant coveralls and face shields before disconnecting any piping from the dead side of the trap valve up to and including the trap inlet valves and trap bypass valve. These coveralls and face shields must be worn until all piping is reconnected.</li> </ul>	<ul style="list-style-type: none"> <li>Use fall protection equipment as required.</li> <li>Wear airline respirator, FR coveralls, Fr hood &amp; FR gloves or liners as required by IP-42</li> </ul>	<ul style="list-style-type: none"> <li>Use fall protection equipment as required.</li> <li>Use appropriate rubber gloves with protective gauntlets, rubber sleeves, fire retardant clothing, and eye protection/face shield as required for electrical hazard.</li> <li>Do not come into contact or move a downed or low hanging utility wire while performing Site Safety or Damage Assessment work</li> </ul>	<ul style="list-style-type: none"> <li>Use fall protection equipment as required</li> <li>Use the appropriate rubber gloves, rubber sleeves, fire retardant clothing, and eye protection/face shield as required for the electrical hazard</li> </ul>
Sheeting/Shoring		Ensure that excavations five feet or deeper are properly sheeted and shored before anyone enters.	Ensure that excavations five feet or deeper are properly sheeted and shored before anyone enters.		
Gas Piping Integrity Test			Perform an integrity test before a customer turn-on.	Perform an integrity test before a customer turn-on.	
Securing Loads					Reels over 5,000lbs (individually or when bundled together) are secured per NYS Metal Coil requirements

## ATTACHMENT 1

# Rules We Live By Determination Report

**EH&S Representative** \_\_\_\_\_

**Determination Date** \_\_\_\_\_

**RWLB Determination**  Yes  No

**RWLB Hazard** [Check all that apply]

- |  |  |
|--|--|
| <input type="checkbox"/> Verify Dead/Lockout-Tag Out | <input type="checkbox"/> Permits (Operating, D-faults) |
| <input type="checkbox"/> Atmospheric Testing         | <input type="checkbox"/> Rescue/Retrieval              |
| <input type="checkbox"/> High Hazard Energy PPE      | <input type="checkbox"/> Sheeting/Shoring              |
| <input type="checkbox"/> Gas Piping Integrity Test   | <input type="checkbox"/> Securing Loads                |

**Employee(s) Information**

**Name** \_\_\_\_\_ **ID** \_\_\_\_\_

**Name** \_\_\_\_\_ **ID** \_\_\_\_\_

**Name** \_\_\_\_\_ **ID** \_\_\_\_\_

**Organization(s)** [Check all that apply]

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Electric Operations | <input type="checkbox"/> Central Operations     | <input type="checkbox"/> Gas Operations |
| <input type="checkbox"/> Customer Operations | <input type="checkbox"/> Utility Shared Service |   |
| <input type="checkbox"/> Contractor          |   |   |

**Incident Information**

**Date** \_\_\_\_\_ **Time** \_\_\_\_\_

**Location** \_\_\_\_\_

**Work task** \_\_\_\_\_  
\_\_\_\_\_

**RWLB violation (briefly describe)**

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**Comments**

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## ATTACHMENT 2

### RWLB PROCESS FLOWCHART

