


California ISO
Shaping a Renewed Future

Illness and Injury Prevention Program

	Health and Safety	Adopted	8/2001
		Version No.	3.0
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ILLNESS AND INJURY PREVENTION PROGRAM		Distribution Restriction: ISO INTERNAL USE ONLY	

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Letter from the President and CEO

It is the policy of the California Independent System Operator Corporation to provide a safe and healthy workplace for all employees and guests of the ISO. The ISO has established and implemented a safety program to help provide a safe and healthy workplace. For everyone's benefit, all ISO personnel need to adhere to the policies and procedures of the program and conduct their work in a safe, responsible manner.

Accident prevention is of primary importance in all aspects of our jobs. Preventing injury is a primary objective at all levels of our company, and management at all levels must make safety an integral part of their regular job functions. It is the duty of all ISO personnel to accept and follow established safety policies and procedures, and to maintain a clean and safe workplace.

Every effort will be made to provide adequate training to ISO personnel. However, if there's ever any doubt about how to do a job or task safely, ask a knowledgeable, qualified person for assistance before resuming your work.

ISO personnel are expected to assist management in accident prevention activities. Any potentially unsafe conditions and all on-the-job injuries must be reported promptly to the injured employee's Manager.


Every injury that occurs on the job, even a slight cut or strain, must be reported. Under no circumstances, except emergency trips to the hospital, should an employee leave the work site without reporting an injury.

When injury incidents occur, everyone is hurt. Please help the ISO maintain a safe working environment by always thinking "safety first."

Thank you for your participation and support.



Steve Berberich
President and Chief Executive Officer
Illness and Injury Prevention Program

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1. Overview

1.1 Objective

The objective of the Safety Department is to implement a health and safety program that will reduce the number of work-related injuries and illnesses to an absolute minimum. Our goal is zero accidents and injuries. We will strive to surpass the best practices and benchmarks of peers in our industry, and in the workplace as a whole.

1.2 Safety and Health Policy

Local, state and federal laws, as well as company policy, make the health and safety of ISO personnel the first consideration in our business. Health and safety are vital to every aspect of the operation, and it is every employee's responsibility to ensure both, at all levels. It is also the obligation and responsibility of the ISO to comply with all laws related to the health and safety of ISO employees and guests.


1.3 Work Conditions

We must constantly be aware of conditions in all work areas that can produce or lead to injuries. ISO employees will never be required to do a job that's known to be unsafe, or harmful to one's health. Cooperation in detecting potential hazards, reporting dangerous conditions and limiting workplace risks is the duty of every employee. Employees must inform their supervisor immediately of any such situation beyond their ability or authority to correct. ISO employees will not be disciplined or suffer any retaliation for reporting in good faith a safety violation or potential hazard.

2. Safety Roles and Responsibilities

2.1 Safety Coordinator

The Safety Coordinator is responsible for developing and administering the ISO's health and safety program, and reports to the Manager of Campus Operations. All levels of ISO Management are expected to fully support the Safety Coordinator. Job duties of the Safety Coordinator will include, but are not limited to, supplementing the *Illness and Injury Prevention Program (IIPP)* by establishing workplace objectives and safety recognition programs, working with all government officials in both accident investigation and safety inspection procedures, encouraging reporting of unsafe conditions, and promoting a safe workplace.

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2.2 Safety Committee

The ISO Safety Committee is comprised of employee and management representatives. It functions as part of the Emergency Response Team. The Safety Committee's primary mandate is to maintain a safe and healthy working environment at all levels of the organization, investigate accidents and their causes, prescribe preventive measures, and advise and educate ISO personnel about safe work practices.

2.3 Directors and Managers


Directors and Managers have a pivotal role in the establishment and success of the ISO's IIPP. They have the responsibility for implementing the IIPP within their departments. Directors and Managers must identify and be familiar with safety and health hazards to which their employees are exposed, the potential consequences of those hazards, and the procedures required for minimizing risks while maintaining a safe workplace. Directors and Managers are duty-bound to convey this information to their employees, and are obligated to promptly report all incidents and workplace hazards to the Safety Coordinator.

3. Participation and Compliance

3.1 Employee Agreement to Participate

A safe and healthy workplace is among the ISO's highest priorities. All ISO personnel are expected to use safe work practices at all times. While the ISO cannot anticipate every workplace hazard, the following general principals should serve as a guide for ISO personnel:

- Always be safety conscious
- Know the safety procedures and responsibilities related to your job
- Discuss safety situations with the Safety Coordinator
- Attend all required safety training and safety meetings
- Read all posters and warnings
- Listen to instructions carefully
- Use safe workplace practices
- Participate in accident investigations as requested
- Accept responsibility for the safety of yourself and others
- Maintain all required documentation

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As a condition of employment with the ISO, employees must read this IIPP and know where to find an updated copy. If you do not understand any part of the IIPP, it is your duty to ask your Manager or the Safety Coordinator for assistance and further explanation.

3.2 Compliance

Directors, Managers and the Safety Coordinator are obligated to ensure all safety and health policies are clearly communicated and understood by ISO personnel. To ensure personnel compliance, the ISO:


- Conducts safety orientations for new employees
- Recognizes employees that perform above and beyond ISO safety policies
- Distributes company-wide safety e-mails and prominently displays written updates and notices
- Conducts periodic safety meetings
- Provides required safety training to applicable personnel
- Enables anonymous reporting through the “Code of Conduct Reporting Tool”
- Disciplines personnel for failure to comply with safety policies

3.3 Consequences of Non-Participation

Personnel who purposefully or willfully fail to comply with the established policies and procedures outlined in this manual or the *Health and Safety Process Manual* will be subject to disciplinary action, up to and including termination.

4. Operating Safety Procedures

All employees and contractors working for the ISO are required to follow the safety procedures covered in the *Health and Safety Process Manual*. The Safety Coordinator regularly reviews safety practices and develops safety procedures on an ongoing basis, and updates the *Health and Safety Process Manual* as appropriate.

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5. Safety Training and Communication

5.1 Overview

ISO policy, as well as local, state and federal law, requires that ISO personnel and guests receive appropriate health and safety training and emergency information. Directors and Managers are responsible for ensuring that ISO personnel and guests under their supervision receive this training so they are fully informed about possible occupational health hazards and know how to work or visit safely.

5.2 Training


Training will include the ISO's health and safety orientation for new employees, as well as any additional training specific to potential hazards on the job; employees must complete this training before they can work unsupervised.

Training and educational information will be provided when:

- The IIPP is materially revised
- Employees are initially hired
- Employees are given new job assignments where training has not been provided
- A new hazard in the workplace is recognized
- An employee is found in violation of the ISO Health and Safety Process Manual
- As needed, for any other reason deemed necessary

5.3 Communication

Communication of safety-related topics and training will be carried out through various methods. Safety training will be conducted in a classroom setting, or through informational handouts and updates. Employees receiving safety training will be required to attest that they understand all information provided to them, and sign documentation to that effect. All safety training documents will be maintained by the Human Resources Department. Other safety-related information may be disseminated by members of the Safety Committee, sent out in company-wide e-mails and provided to all employees in the form of a quarterly newsletter. The Safety Coordinator will periodically review all safety-related information for relevance and accuracy.

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6. Hazard Identification and Abatement

6.1 Workplace Inspections

Inspections of the Folsom and Alhambra ISO sites will be performed quarterly by the Safety Coordinator, or other appropriate safety personnel working under his or her authority. Inspections will also take place when:

- New potential hazards are introduced into the ISO workplace, such as new materials or equipment
- New or previously unidentified hazards are recognized
- Occupational injuries or illnesses occur
- Workplace conditions warrant an inspection

Hazard identification and abatement records will be maintained by the Safety Coordinator for a period of not less than three years. The Safety Coordinator will also conduct periodic walkthroughs of the ISO facilities and properties.

6.2 Abatement of Unsafe Conditions


It is extremely important that unsafe conditions, once recognized, be corrected as quickly as possible. The Safety Coordinator is responsible for overseeing and documenting the abatement of unsafe conditions.

7. Incident Investigation

7.1 Incident Investigation

The Safety Coordinator is responsible for completing a thorough investigation of all unsafe or potentially unsafe events that occur at the ISO. If appropriate, the Safety Coordinator shall submit the results of each investigation in writing to the Manager of Campus Operations and Vice President of Human Resources. Investigation reports may be released to others as needed.

If the incident results in serious injury, illness or death, the California Division of Occupational Safety and Health (DOSH) and ISO attorneys will be notified as soon as possible after the occurrence, and no longer than eight hours after the ISO has knowledge of the incident, or would have knowledge with diligent inquiry. All investigations pursuant to the directions of legal counsel will be protected by all applicable privileges.

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7.2 Reporting an Injury Incident

Every injury sustained while performing ISO job duties requiring more than a Band-Aid, no matter how minor, must be reported to the employee's Manager and the Safety Coordinator. It is the employee's responsibility to notify his or her manager and the Safety Coordinator of the injury or illness and any treatment received. Once an injury has been reported to a Manager, the Manager is responsible for completing a Report of Incident Form, available in the *Health and Safety Manual*, and submitting it to the Safety Coordinator.

7.3 Procedure


When an unsafe condition has been identified or an accident has occurred:

1. The Safety Coordinator will investigate the incident scene as soon as possible. If necessary, the Safety Coordinator will enlist the help of outside consultants to assist in an investigation.
2. Injured workers and witnesses may be interviewed.
3. The scene and surrounding area will be examined for additional factors associated with the incident.
4. Corrective action will be taken to prevent the accident from happening again.
5. All findings will be recorded by the Safety Coordinator.
6. The Safety Coordinator will coordinate with local, state or federal agencies as appropriate.

8. Employee Health Services

8.1 Workers' Compensation and Employee Assistance Program

The ISO provides worker's compensation insurance benefits as required by law. The Human Resources Leave of Absence and Worker's Compensation Administrator handles all claims, and acts as the contact between the ISO and the Third Party Administrator. The ISO also offers confidential assistance in resolving personal problems such as alcoholism, drug abuse, emotional disturbances and legal, marital, or

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financial difficulties. Employees may seek this assistance through the ISO Employee Assistance Program (EAP). More information regarding the EAP can be found in the new hire orientation packet and in the Human Resources office.

8.2 Occupational Injury and Illness

An occupational injury or illness is one that results from a work accident or a harmful exposure in the work environment. In most cases, the employee will be referred to his or her private physician, a selected specialist, or a hospital emergency room. In the event that a patient cannot be moved from the site of the injury, appropriate medical personnel will be called. The ISO employs the use of an Automated External Defibrillator (AED) with trained personnel for sudden cardiac arrest. No injured or ill persons, regardless of employment status, will be denied first aid or referral to medical resources in the community.


8.3 Transitional Duty and Return to Work

When it is practical, the ISO will provide temporary work assignments (known as “transitional duty”) for employees who have recovered from a work-related injury or illness but are unable to immediately perform their regular duties. The Human Resources department is responsible for communicating with the employee’s Manager and determining the appropriate transitional work duty. Human Resources will communicate with the Third Party Administrator regarding worker’s compensation information and maintain worker’s compensation paperwork. Managers are responsible for working with Human Resources in determining appropriate transitional work duties.

9. Record Keeping

The Safety Coordinator shall maintain copies of all accident investigations, inspection records and certification of employee safety training. A written report will be maintained on each accident, injury or on-the-job illness requiring medical treatment. A record of each Occupational Safety and Health Administration (OSHA)-recordable injury or illness should be recorded on the OSHA 300 Log form, with supplemental records of each injury recorded on the OSHA 301 Form.

Every year, the OSHA 300A Form, which provides a summary of all reported injuries or illnesses, will be posted in areas accessible by all employees no later than February 1, and will remain posted until April 30. The Safety Coordinator is responsible for maintaining these records for five years, in accordance with the ISO’s *Record Retention Policy*.

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10. Emergency Response

10.1 Safety Coordinator

When possible, the Safety Coordinator will respond to all medical and safety-related emergencies or incidents. If the incident becomes a corporate-wide event and the Incident Management Team is activated, the Safety Coordinator will report to the Incident Commander and assume the responsibilities outlined in the ISO's *Incident Management Plan*. If warranted, the Safety Coordinator will initiate an investigation following an incident and follow-up with any compliance or reporting requirements.

10.2 Floor Wardens


Floor Wardens are designated personnel who assist other employees and serve as exit guides during evacuations in the event of an emergency. All Floor Wardens must attend initial and annual training to maintain their Floor Warden status. Floor Wardens are responsible for knowing all exit and fire extinguisher locations in their respective buildings, and informing personnel in their zones about evacuation routes and assembly locations. In the event of an emergency evacuation, Floor Wardens help assure that all personnel evacuate the premises safely. Once evacuation is completed, Floor Wardens will check into the Command Post for further instruction. Floor Warden activities are managed by the Campus Operations Department.

10.3 Physical Security

The Security Department uses standard operating procedures known as Post Orders, which cover both daily operations and a number of pre-conceived emergencies.

Current Post Orders contain procedures for bomb threats, fire emergencies, evacuation procedures, medical emergencies, violent crimes and other emergencies. The Security Department's primary responsibilities during an emergency and evacuation are scene management, and ensuring employees do not re-enter any building before the "all clear" signal has been given.

The Manager of Campus Operations is responsible for the activities of the physical security team.

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10.4 First Aid Response

ISO security personnel are trained and equipped to provide first aid at a basic life support level. In addition to providing first aid medical attention, ISO security personnel are trained to use an automated external defibrillator (AED) in the event someone suffers sudden cardiac arrest. The ISO maintains AED's on both the Folsom and Alhambra Campuses. To request first aid, ISO personnel should dial extension 2303 or 9-911. Additional communications resources specific to each campus may be available.

10.5 First Aid Cabinets

First aid medical cabinets are located in the ISO's break areas, storage rooms and mail room. The first aid cabinets contain basic first aid supplies such as bandages, burn cream, antiseptic wipes and personal protective barriers such as safety glasses, face shields and latex-free nitrile gloves. The first aid cabinets also contain over-the-counter medications for sore throat, pain and headaches. The ISO strongly recommends that those considering the use of any over-the-counter medication consult their physician before doing so. The supplies in the first aid cabinet should be used for emergencies only.


11. Contractors

11.1 Supervisor Responsibility

ISO Managers, Directors and Executive Team Members are responsible for supplying contractors with all appropriate information, as well as all paperwork that needs the contractor's signature, before contractors commence work at the ISO. Failure to provide all necessary information and paperwork could result in a delay of the work start date.

11.2 Contractor Responsibility

All contractors working for the ISO are required to comply with the written policies and procedures of the ISO's *Illness and Injury Prevention Program, Health and Safety Process Manual*, and all local, state and federal safety standards. Failure to comply with ISO safety policies, procedures or other applicable laws while on the job may result in the termination of the contract between the ISO and the contractor.

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12. Ergonomics

12.1 Overview

The ISO will supply its personnel with the equipment and training necessary to promote a safe and ergonomic work place. Training and equipment will be supplied at no cost to the employee. If an employee is suffering from Musculoskeletal Disorder (MSD), reasonable accommodations will be made, when possible, so that the employee may continue his or her duties. If time off from the work place is required under the advice of a medical physician because of MSD, time off will be granted to the employee in accordance with state worker's compensation laws and state and federal employment laws.


12.2 Ergonomic Standard

The ISO will provide adjustable workstations to help prevent injuries associated with repetitive motion and long-term positioning or posture. Equipment used to meet the standard will include fully adjustable, appropriately fitted chairs, height-adjustable work surfaces, and moveable keyboard and mouse trays.

Additional equipment, if needed, may include footrests, trackball mice, telephone headsets, anti-glare screen covers, task lighting and document holders. If specialized equipment is needed based on an ergonomic evaluation or a physician's recommendation, the ISO will provide reasonable accommodation. Contractors should contact their employer if they need specialized equipment not covered in this standard.

12.3 Evaluations

When an employee reports ergonomic risks, or when such risks are identified through an ergonomic evaluation, the ISO will provide reasonable accommodations to reduce, minimize or eliminate those risks by issuing appropriate equipment, or putting proper safeguards in place. Contractors are not eligible for ergonomic evaluations performed by the ISO. However, contractors are entitled to a workspace that meets the ISO ergonomic standard. If a contractor is experiencing discomfort, the Safety Coordinator will verify that the contractor's workstation meets the standard.

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13. Fire Prevention and Life Safety

13.1 Fire Extinguishers

Fire extinguishers are provided in various locations throughout the ISO's offices. All Extinguishers at the ISO are suitable for Class A, B and C fires.

While quick, safe use of a fire extinguisher in an emergency situation may stop a fire before it spreads and becomes uncontrollable, employees are not obligated to extinguish a fire if one occurs.

13.2 Exits


All exits from ISO buildings are to remain clear of obstructions at all times. Main corridors of all ISO buildings are not to be used for storage, either on a temporary or permanent basis, and must remain clear "wall to wall." All exit walkways and paths from any office space will not be any less than 34 inches wide, unless specified by design.

All exits will be marked with a sign. For instances where the location of the nearest exit is not immediately apparent, the ISO will place a sign marked "Exit" with an arrow pointing toward the nearest way out. Every exit sign shall be suitably illuminated by a reliable light source.

13.3 Fire Prevention

Fires, like other types of accidents, are largely preventable. It is important to know what the potential fire hazards are in your area. Below is a list of common causes of fires.

- Overloaded circuits, unsafe wiring and defective extension cords
- Appliances such as heating plates and other heating devices left unattended when on
- Unattended cooking
- Not using an ashtray or improperly disposing of ashes into regular trash cans
- Improper use, handling or storage of flammable liquid
- Poor housekeeping which results in the accumulation of combustibles such as paper boxes and flammable liquids
- Improper use of welding or soldering equipment

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Different combustibles are associated with different classes of fire. Ordinary combustibles such as paper and wood, liquid combustibles such as grease and gasoline, and combustibles from an electrical source, such as a circuit breaker, cause class A, B, and C fires, respectively. Class D fires are the result of combustible metals, such as magnesium, and occur most often in a laboratory environment.

ISO fire extinguishers are designed to handle class A, B and C fires. Because combustible metals are not typically found in the ISO workplace, the ISO does not use class D fire extinguishers.

14. Hazard Communication

14.1 Overview

The *OSHA Hazard Communications Standard* mandates that employers conduct a comprehensive evaluation of potential chemical hazards in the workplace, inform employees of those hazards, and provide information for taking appropriate protective measures to avoid or limit exposure to such hazards.

The ISO does not produce or store chemicals in large quantities. However, ISO personnel have both a need and a right to know the hazards and identities of any chemicals to which they could be exposed while working.

The ISO follows the *OSHA Hazard Communications Standard* to provide such notification, when necessary.