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ELECTRIC POWER INTERRUPTIONS AND EMPLOYEE SAFETY

California employers, as electric utility customers, have always faced the risk of periodic electric power interruptions due to various factors, such as weather, individual transmission line failures, individual transformer failures, and operational factors. The current electric power supply shortage has only increased the likelihood that individual customers will experience electric power interruptions, and, therefore, does not represent a new workplace hazard for California employers.

Employers are always required to anticipate the consequences of an electric power interruption where employee safety is dependent on the non-interruption of power. The current supply shortage serves as a reminder that employers should inspect and review their facilities, operations, processes, systems and procedures to determine whether hazards could arise from power interruptions and to ensure that their emergency procedures are adequate to address them.

The extent to which employee safety issues are raised by the prospect of a power interruption is dependent on the specific circumstances of each employer. Fire suppression, emergency communications, lockout-tagout, ventilation, temperature control, illumination and elevator safety are just a few examples of the facilities, operations, processes, systems and procedures that could be adversely affected by power interruptions.

Where such interruptions can create a hazard to employees, California's Injury and Illness Prevention (IIP) Program requirements, found at Title 8, California Code of Regulations (CCR), Section 3203, obligate employers to evaluate the hazard posed (8 CCR 3203(a)(4)), and to adopt corrective methods or procedures (8 CCR 3203(a)(6)), to protect their employees. It is the employer's responsibility to make hazard assessment determinations and to establish, implement and maintain procedures for employee safety during an electric power interruption of whatever origin.

In addition to the general requirements that apply to all employers under 8 CCR 3203, there are other more detailed requirements relative to power interruptions found in Title 8 standards that may be applicable in specific employment settings, e.g., Process Safety Management (8 CCR 5189), Confined Space Entry (8 CCR 5156 through 5158), Emergency Procedures (8 CCR 3220) and various other Title 8 standards.

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