

Pacific Gas and Electric
77 Beale St.
San Francisco, CA 94105

March 31, 2017

David Thomas
California Occupational Safety and Health Standards Board
2520 Venture Oaks Way, Suite 350
Sacramento, CA 95833

Subject: Proposed Rule Heat Illness Prevention in Indoor Places of Employment

Dear Chairman Thomas and Members of the Board:

Pacific Gas and Electric (PG&E) is committed to public, employee and contractor safety and health. PG&E welcomes the opportunity to comment on the proposed rule by partnering with the Standards Board on improvements in workplace safety. We have offered the comments below for OSHSB consideration.

Title 8 Section 3203 already requires hazard identification and mitigation. PG&E received a citation in 2012 at one of our facilities under Section 3203 for not formally addressing an indoor heat exposure. The abatement accepted by Cal/OSHA was a revision to our Heat Illness Prevention Standard written for compliance to Section 3395 "Heat Illness" to include indoor as well as outside exposures (just adding the word indoor).

Consideration must be given to the risks to employers and employees when there are varying regulations addressing the same exposure concern. A large population in the Construction Industry spends significant time both indoors and outdoors. The risk in having two Heat Illness regulations far outweighs any perceived benefit.

Therefore, PG&E recommends relying on 3203 as the means of enforcement (as we were previously cited under), or revising Section 3395 to include all places of employment or outdoor and indoor places of employment.

As for the economic impacts, PG&E feels there is not enough information available to analyze for economic impact to our organization.

Sincerely,

Christina Juarez, CIH

Pacific Gas and Electric (PG&E)

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