

OFFICE OF ENERGY INFRASTRUCTURE SAFETY

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November 8, 2021

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Subject: Office of Energy Infrastructure Safety Issuance of Liberty Utilities' 2021 Safety Culture

Assessment per Public Utilities Code Sections 8389(d)(4)

Dear Mr. Parrillo:

Enclosed is the 2021 Safety Culture Assessment (SCA) report for Liberty Utilities (CalPeco Electric), LLC, (Liberty) conducted by DEKRA on behalf of the Office of Energy Infrastructure Safety (Energy Safety) in fulfillment of Public Utilities Code Section 8389(d)(4). This is the first annual SCA under this statute and as such provides a baseline for future comparison. Energy Safety will use the SCA reports to assess safety culture outcomes over time and incorporate continuous learning into the SCA process.

Energy Safety provided a draft of the report to Liberty on October 27, 2021, for factual review and correction. On November 5, 2021, Liberty confirmed that it would not be providing any written response to this draft report.

Liberty can satisfy the "good standing" requirement in Public Utilities Code Section 8389(e)(2) by agreeing to implement all of the findings (including recommendations for improvement) of its most recent SCA. This may be done by submitting a letter to this effect via E-Filing on the 2021 Safety Culture Assessments docket (Docket #2021-SCAs).¹

Sincerely,

Melissa Semcer

Melissa Semcer Program Manager, Electric Safety Policy Division Office of Energy Infrastructure Safety

¹ The 2021 Safety Culture Assessments docket can be accessed at https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2021-SCAs.

cc:

Caroline Thomas Jacobs, Director, Office of Energy Infrastructure Safety

Sara Moore, Wildfire Safety Analyst, Office of Energy Infrastructure Safety

Service List for Docket #2021-SCAs

SAFETY CULTURE ASSESSMENT



LIBERTY UTILITIES NOVEMBER 2021



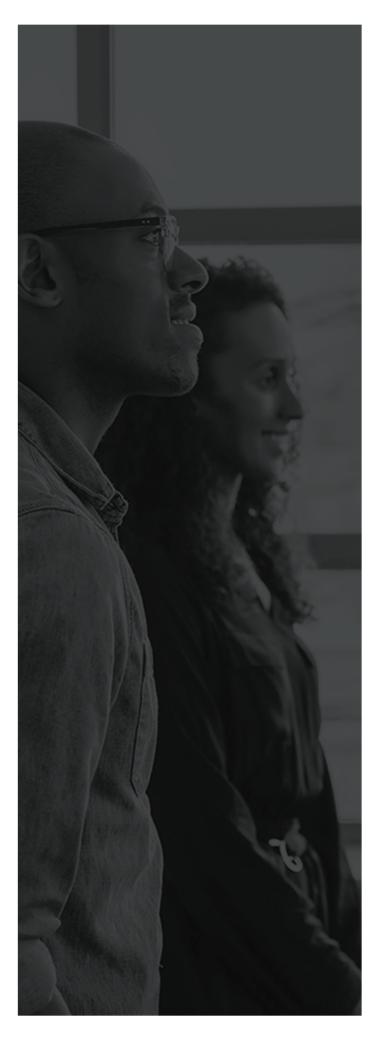


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1. Executive Summary

In 2019, California Assembly Bill 1054 added an annual safety culture assessment requirement to the Public Utilities Code. Public Utilities Code Section 8389(d)(4) requires the California Public Utilities Commission (Commission or CPUC), in consultation with the Wildfire Safety Division—as of July 1, 2021, now the Office of Energy Infrastructure Safety (Energy Safety), a new department under the California Natural Resources Agency—to develop a process for an annual Safety Culture Assessment for each electrical corporation. The annual Safety Culture Assessment process (approved by the Commission in 2020 in Resolution WSD-011) includes a workforce survey, a management self-assessment, submission of supporting documentation, and interviews. Not all components apply to all electrical corporations. Energy Safety required small and multi-jurisdictional electrical corporations, including Liberty Utilities (Liberty), to participate in the workforce survey and submit supporting documentation including its safety culture objectives for the next 12 months and three years and also its summary of lessons learned from the previous 12 months for the Safety Culture Assessment. Energy Safety contracted with DEKRA Services, Inc., (DEKRA) to conduct the inaugural 2021 annual Safety Culture Assessment for each electrical corporation. The Safety Culture Assessments took place in May and June 2021. In the course of these assessments the safety culture of Liberty Utilities was assessed with respect to both personal and wildfire safety.

Liberty Utilities has a strong wildfire and personal safety culture safety. Scores on the 30-statement workforce survey are among the highest across the electrical utilities surveyed. Furthermore, Liberty Utilities has put in place several safety culture objectives for the next year and the following three years that should ensure continued progress.

It is unclear, however, how the measures supporting the safety culture objectives will be implemented to improve wildfire safety. This is important because the method of implementation will determine whether the measures supporting the objectives will meaningfully advance the safety culture. Consider, for example, the Safety Observations objective, where annual safety observation targets have been set for different levels of leadership (e.g., 24 observations each per year for field supervisors/managers). To achieve these targets, frontline supervisors need the communication and feedback skills required to conduct safety observations that engage employees on wildfire-related topics. For example, frontline supervisors need the skills to encourage suggestions for improving wildfire hazard mitigation. These discussions can positively shape the safety culture and can have a long-lasting positive impact on the workforce. The challenge lies in ensuring the frontline supervisors are equipped to conduct the observations consistently and effectively.

Furthermore, Liberty Utilities needs to increase its capacity for organizational learning. Therefore, to address gaps in the safety culture, Liberty Utilities should act on the following recommendations:



- 1. Ensure the target for safety observations by field supervisors and managers is met and quarterly operations field team meetings are held as planned to improve employee engagement on wildfire hazards and address safety culture gaps.
- 2. Strengthen employee and supervisor training to incorporate human performance reliability skills and techniques.

Implementing these recommendations should enable Liberty Utilities to continue advancing its already-strong wildfire and personal safety culture. A detailed narrative on the information collected through the workforce survey, supporting documentation, and the corresponding assessment and findings is provided below.



2. Overview

Assembly Bill 1054, signed by Governor Newsom in July 2019, states that "[b]y December 1, 2020, and annually thereafter, the [California Public Utilities Commission], after consultation with the [Wildfire Safety Division], shall adopt and approve [...] [a] process for the division to conduct annual safety culture assessments for each electrical corporation" (Public Utilities Code Section 8389[d][4]).¹

On November 30, 2020, the California Public Utilities Commission (Commission or CPUC) issued its approval for a process for conducting annual safety culture assessments for each electrical corporation in Resolution WSD-011.² On January 22, 2021, the Wildfire Safety Division (WSD) at the CPUC published the Safety Culture Assessment (SCA) Requirements of Electrical Corporations (2021 Requirements).³ The 2021 Requirements set out the key components of the SCA process: a workforce survey, a management self-assessment, submission of supporting documentation, and interviews. The 2021 Requirements also provide guidance as to which components apply to which electrical corporations.

The first SCA under Public Utilities Code Section 8389(d)(4) took place in May and June 2021 under the WSD's direction. On July 1, 2021, the WSD transitioned to the Office of Energy Infrastructure Safety (Energy Safety), a new department under the California Natural Resources Agency. The first SCA reports are being issued under the direction of Energy Safety.⁴

⁴ Pursuant to Public Utilities Code Section 326(b), on July 1, 2021, the WSD transitioned from the CPUC into the Office of Energy Infrastructure Safety (Energy Safety) under the California Natural Resources Agency. Energy Safety "is the successor to" and "is vested with all of the duties, powers, and responsibilities of the Wildfire Safety Division" (Government Code Section 15475). WSD is used to describe the work of the WSD prior to July 1, 2021. Energy Safety is used to describe the work of Energy Safety beginning on July 1, 2021. Any references to WSD action post July 1, 2021, or to Energy Safety action prior to July 1, 2021, are inadvertent and should be interpreted as the actions of WSD or Energy Safety as appropriate.



¹ The full text of Pub. Util. Section 8389 can be found here: https://leginfo.legislature.ca.gov/faces/codes displaySection.xhtml?sectionNum=8389.&lawCode=PUC (accessed July 16, 2021).

² Resolution WSD-011 "Resolution implementing the requirements of Public Utilities Code Sections 8389(d)(1), (2) and (4), related to catastrophic wildfire caused by electrical corporations subject to the Commission's regulatory authority," dated November 19, 2020, and issued November 30, 2020: https://energysafety.ca.gov/wp-content/uploads/docs/misc/docket/352490594.pdf (accessed August 18, 2021). Also see the attachments to WSD-011, including Attachment 4 "Annual Safety Culture Assessment Process Proposal," dated November 2020: https://energysafety.ca.gov/wp-content/uploads/docs/wmp-2021/docs/352460864.pdf (accessed August 18, 2021).

³ Safety Culture Assessment: Requirements of Electrical Corporations (published Jan. 22, 2021, accessed July 16, 2021): https://energysafety.ca.gov/wp-content/uploads/docs/safety-culture-assessments/wsd-safety-culture-assessment-requirements-final-20210122.pdf.

The present SCA process is intended to be complementary to, and not a replacement for, ongoing work to improve safety culture at each electrical corporation. Energy Safety seeks to develop a longitudinal view of safety culture across electrical corporations to identify best practices and relative gaps, along with an understanding of each electrical corporation's relative strengths and weaknesses. Ultimately, Energy Safety seeks to assess safety outcomes over time and incorporate continuous learning into the assessment process.⁵

Different components of the SCA target different parts of the electrical corporation's workforce, and different components apply to different types of electrical corporations (see Section 2.1 below). The workforce survey is intended to target electrical corporation employees (including frontline workers and supervisors) and contractors who are engaged in wildfire hazard mitigation activities, for example workers performing vegetation management or installing system hardening infrastructure. 6 The management self-assessment and supporting documentation components are intended to be completed by electrical corporation employees capable of: evaluating the corporation's presently employed practices and capabilities regarding safety, identifying a target level on the four-point scale for each question by the end of 2022 based on wildfire mitigation and safety initiatives planned in the coming year, and describing its plan to realize that target.⁷ The interview component is intended to support the workforce survey and management self-assessment by asking additional questions of those who may have participated in those components for further context. The interviews are intended to help DEKRA interpret the results of the survey and selfassessment more accurately and better identify the priority areas that electrical corporations should focus on improving.8

2.1 Components of the SCA

As stated above, the key components of the SCA are a workforce survey, a management self-assessment, submission of supporting documentation, and interviews. Not every component applies to every electrical corporation. An overview of the SCA components, together with guidance on which electrical corporations must complete each SCA component, is below. Note that electrical corporations are categorized as follows for this purpose:

⁸ Safety Culture Assessment: Requirements of Electrical Corporations (2021), p. 35.



⁵ Safety Culture Assessment: Requirements of Electrical Corporations (2021), p. 3.

⁶ Safety Culture Assessment: Requirements of Electrical Corporations (2021), p. 8.

⁷ Safety Culture Assessment: Requirements of Electrical Corporations (2021), p. 14.

- Large electrical corporations ("Large IOUs"⁹): Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE).
- Small and multi-jurisdictional electrical corporations ("SMJUs"¹⁰): Liberty Utilities (CalPeco), PacifiCorp, Bear Valley Electric Service, Inc.
- Independent transmission operators ("ITOs"): Horizon West Transmission, Trans Bay Cable.

SCA requirements	Electrical corporations that must complete this requirement
Workforce survey	Large IOUs, SMJUs
Management self-assessment and plan summary	Large IOUs
Supporting documentation Section 1: Safety culture objectives	Large IOUs, SMJUs, ITOs
Supporting documentation Section 2: Summary of lessons learned	Large IOUs, SMJUs, ITOs
Supporting documentation Section 3: Summary plan for the following year	Large IOUs
Supporting documentation Section 4: Documentation to support responses to the management self-assessment	Large IOUs
Interviews	To be determined by Energy Safety upon review of submissions
Observational visits	To be determined by Energy Safety upon review of submissions

⁹ IOU: investor-owned utility.

¹⁰ SMJUs: small and multi-jurisdictional utilities.



2.2 Framework for the SCA

The abovementioned components of the SCA (a workforce survey, a management self-assessment, submission of supporting documentation, and interviews) all inform the SCA findings. The SCA components are designed to be administered annually such that progress on the SCA can be measured over time. This is the inaugural assessment and will provide the baseline for evaluating progress in future years. Figure 1 below shows the elements of the organization's safety culture and foundation assessed by different components of the SCA.

The workforce survey component was designed to evaluate leadership's influence on the safety culture and the impact that it has on worker behavior. This was supplemented with follow-up interviews of frontline employees and supervisors. The management self-assessment component was designed to evaluate the organizational sustaining and safety enabling systems that undergird and reinforce every safety culture. In addition, the self-assessment measured the electrical corporation's approach to governance of its safety culture. The self-assessment was also supplemented by a focus group comprised of electrical corporation staff members who participated in the organization's self-assessment responses.

Direct drivers of outcomes External factors Leadership influence Workforce behavior **Culture:** Advocating for workforce Raising concerns Measured through Prioritizing safety Performing reliably workforce survey Outcomes Leading by example Taking responsibility Working interface • Work being done; who is doing it Covered by Wildfire Mitigation Plan evaluation and compliance Organizational Foundation Management **Organizational** decisions Self-Assessment Safety enabling Wildfire mitigation initiatives Board Executive

Figure 1. Framework for the Safety Culture Assessment

Source: Resolution WSD-011 Attachment 4 "Annual Safety Culture Assessment Process Proposal" (2020), p. 9.



2.3 Survey Data Collected

The first stage of the SCA process is a workforce survey. The workforce survey is comprised of 30 statements rated on a five-point Likert Scale¹¹ from Strongly Disagree to Strongly Agree. The 30 statements were originally sourced from DEKRA's validated safety culture instrument, called the Organizational Culture Diagnostic Instrument (OCDI).¹² The OCDI statements were then cut and modified to (a) reduce the size of the survey and (b) ensure the SCA survey questions covered aspects of wildfire hazard mitigation pertinent to the SCA. The survey statements are all framed in a positive light (e.g., "managers treat workers with respect"), so agreement with any statement can be considered an indication of better performance by the corporation. The statements were constructed in this way to avoid respondent misinterpretation or coding errors and to improve the interpretation of the survey results.¹³

The 30 workforce survey questions fell into one of three categories: wildfire, safety, and culture. Nine questions specifically asked about the electrical corporation's safety culture with regard to wildfire (e.g., "our management acts quickly to address wildfire hazards"), eleven questions specifically asked about personal safety (e.g., "pausing work for hazards and safety concerns is viewed positively"), and ten questions asked about workplace culture in general (e.g., "the company cares about my opinions").

DEKRA instructed the electrical corporation to share the survey with all classifications of employees directly involved in wildfire mitigation. Based on that instruction, the electrical corporation selected the classifications of employees that would receive the survey.

DEKRA (via Liberty Utilities) administered the workforce survey using both electronic and paper surveys to ensure all levels of Liberty employees and contractors had an ample opportunity to complete the survey. Liberty Utilities distributed the survey on May 11, 2021. Participants had 11 working days to respond (the survey closed on May 25, 2021). A total of 65 employees responded to the survey out of a base population of 70 employees working on wildfire mitigation, a response rate of 93 percent. In addition, DEKRA received survey responses from eight Liberty Utilities contractor employees out of out of a population base of 91 employees of Liberty Utilities contractors, a response rate of 9 percent.

¹³ See the following research article evaluating the effects of using positively and negatively worded survey statements: Sauro and Lewis (May 2011), "When Designing Usability Questionnaires, Does It Hurt to Be Positive?" Proceedings of the SIGCHI Conference on Human Factors in Computing Systems, https://measuringu.com/wp-content/uploads/2017/07/sauro_lewisCHI2011.pdf (accessed August 23, 2021).



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¹¹ A Likert scale is a rating system commonly used in questionnaires and survey research to measure people's attitudes, perceptions, and opinions. For more information, see: https://www.questionpro.com/blog/what-is-likert-scale/ (accessed July 28, 2021).

¹² For more information about the OCDI see: https://www.dekra.us/en/organizational-safety-reliability/ocdi/ (accessed July 28, 2021).

2.4 Supporting Documentation Collected

In addition to the workforce survey (described above), Energy Safety required small and multi-jurisdictional electrical corporations, including Liberty Utilities, to submit the following supporting documentation:

- 1. Safety culture objectives for the next 12 months.
- 2. Safety culture objectives for the next three years.
- A description of lessons learned since the most recent Safety Culture Assessment.¹⁴

Small and multi-jurisdictional electrical corporations were not required to participate in any interviews or observational visits in 2021.

The documentation submitted by Liberty Utilities is included in Section 6 of this report.

2.5 Next Steps in the Assessment Process

This is the first annual Safety Culture Assessment under Public Utilities Code Section 8389(d)(4) and as such provides a baseline for future comparison. Following the publication of this report, Liberty Utilities may agree to implement its findings to demonstrate "good standing" per Public Utilities Code Section 8389(e)(2).¹⁵

https://leginfo.legislature.ca.gov/faces/codes displaySection.xhtml?sectionNum=8389.&lawCode=PUC).



¹⁴ As 2021 is the first year of the annual Safety Culture Assessment under Public Utilities Code Section 8389(d)(4), the electrical corporation was asked to evaluate lessons learned since its "most recent" safety culture assessment (if any), and specifically to: "[d]escribe how the electrical corporation's objectives and priorities with respect to safety culture have evolved over the past year. Outline any major themes and lessons learned over the past 12 months and subsequent actions taken. If you have not completed a safety culture assessment in over three years, consider your safety culture as it exists today and describe the major themes that exist today." (See Section 6.4 "Lessons Learned" below for more information.)

¹⁵ Pub. Util. Section 8389(e)(2), "The electrical corporation is in good standing, which can be satisfied by the electrical corporation having agreed to implement the findings of its most recent safety culture assessment, if applicable" (accessed July 16, 2021):

3. Findings

3.1 Strengths

3.1.1 Liberty Utilities has a positive organizational culture that includes wildfire and personal safety.

As noted above, the 30 statements on the workforce survey fell into one of three categories: wildfire, safety, and culture. Liberty's average survey scores were high in all three categories (4.25, 4.23, and 4.31, respectively, on a five-point scale; see Section 6.1.1). In response to the statement "Managers treat workers with respect," 87 percent of respondents either "strongly" or "somewhat" agreed, and 89 percent "strongly" or "somewhat" agreed with the statement "My supervisor would use whatever power he/she has to help me out." Also, 94 percent of respondents "strongly" or "somewhat" agreed with the statement "People in my work group treat each other with respect."

Other positive aspects of the corporation's foundational culture are also evident in the workforce survey in responses related to wildfire and personal safety. For example, 95 percent of respondents "strongly" or "somewhat" agreed with the statements "Protecting the community from wildfire hazards is a high priority with management" and "I feel comfortable discussing wildfire hazards with my supervisor." Additionally, 89 percent "strongly" or "somewhat" agreed with the statement "Wildfire and personal safety concerns are communicated openly" and 86 percent "strongly" or "somewhat" agreed with the statement "My workgroup follows procedures to control workplace and wildfire hazards."

Other responses on the survey indicate a culture that supports safety and personal responsibility: all respondents "strongly" or "somewhat" agreed with the statement "I take responsibility for the safety of myself and others in my work area." Furthermore, 95 percent of respondents "strongly" or "somewhat" agreed with the statement "If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor."

Contractor employees responding to the survey rated Liberty's safety culture even more highly. Eight of the 73 survey respondents were contractor employees, and they consistently rated the statements on the survey higher than Liberty's full-time employees (see Section 6.1.2).

3.1.2 Liberty has planned specific educational and field engagement safety culture objectives for the next 12 months.

Liberty's safety culture objectives for the next 12 months are heavily focused on education and engagement of field employees on safety culture via training, observations, quarterly team meetings, and "safety moments" (that is, moments before



the job begins when critical safety concerns can be discussed, planned for, and controlled).

Education and training should set the stage for the desired behavior change, but these tools must be reinforced in the work environment to ensure the desired skills transfer from the classroom to the job site. Liberty provides support for this transfer to occur by setting specific targets for supervisor observations of the workforce. These observations paired with feedback, coaching, and safety moments are powerful tools for bringing about desired changes in workplace behavior. Education and training will be augmented by quarterly team meetings and bi-weekly leadership meetings designed to review and resolve safety issues and share lessons learned to avoid the recurrence of incidents in the future.

3.2 Opportunities

3.2.1 The 12-month leadership engagement safety culture objectives do not directly address wildfire hazards or detail how these objectives will be implemented.

Most of Liberty's six 12-month safety culture objectives include components intended to increase frontline supervisor engagement in safety, including a new target for safety observations (with a target of 24 observations a year for field supervisors/managers) (see Section 6.2.1). However, it is unclear to what extent the activities associated with the 12-month objectives (a) incorporate wildfire safety topics and issues or (b) will be conducted in ways to improve the safety culture.

Only 52 percent of respondents "strongly" or "somewhat" agreed to the survey statement "I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them" which is the lowest endorsed statement on the survey. The supervisor safety observations need to incorporate wildfire hazards so that the field conversations go beyond personal safety to address the wildfire hazards as well.

Secondly, the 12-month objectives do not detail how these leadership safety activities will be conducted. Managers who use the observations to catch people doing something wrong and punish them can do long-term harm to the organizational culture. Managers need to conduct the observations in a way that engages in two-way discussions with employees about wildfire and safety hazards, challenges, and ideas for improvement.

3.2.2 Liberty Utilities needs to improve its ability to learn from errors organizationally, particularly for field business units.

Organizations that set up workers for success, adapt to changes, and learn from mistakes are organizations that equip workers with the right tools for the job, allow workers to focus on one task at a time and report mistakes so learning can occur, and respond quickly when problems occur. These characteristics are addressed in several



statements on the workforce survey, including "People report mistakes they make, even if others do not notice them," "People focus on one task at a time and avoid distractions," "People have the ability to respond and correct problems and errors before they get out of control," and "We have the right tools for the job."

However, scores on these statements are among the lowest-rated statements for Liberty. Only 55 percent of respondents "strongly" or "somewhat" agreed with the statement "People focus on one task at a time and avoid distractions" and only 62 percent "strongly" or "somewhat" agreed with the statement "People report mistakes they make, even if others do not notice them." Furthermore, for those working in the field in Project Construction or Transmission/Distribution Operations, the statement "We have the right tools for the job" was among the lowest scores on the survey (3.60 and 3.73, respectively, see 6.1.2). Project Construction and Transmission/Distribution Operations respondents also rated the statement "People have the ability to respond and correct problems and errors before they get out of control" among the lowest on the survey (3.40 and 3.81, respectively).

Improving survey scores on these statements would indicate Liberty Utilities' safety culture is becoming one that takes a systems approach to setting up workers for success, adapting to changes, and learning from mistakes across the organization.



4. Recommendations

4.1 Ensure the supervisor safety observation target is met and quarterly operations field team meetings are held to improve employee engagement on wildfire hazards and address safety culture gaps

To support its 12-month safety culture objectives, Liberty Utilities has set a target for safety observations by field supervisors/managers and is planning quarterly operations field team meetings to improve the organization's wildfire and personal safety culture. These actions could have a considerable impact in raising the profile of wildfire hazard issues, opening the lines of communication with employees, and addressing gaps identified in the survey.

These actions focus on leadership engagement with employees in the field on issues of wildfire and personal safety. However, the quality of the interactions between frontline supervisors and frontline workforce will determine the success of these measures. How supervisors conduct observations and meetings is critical. Liberty's senior leadership should set clear expectations for these interactions, provide training for supervisors in communication skills, and ensure that supervisors are coached to support the transfer of skills learned in training to the field context.

- Observation: Liberty Utilities has set a target for frontline supervisor safety
 observations and is planning to hold quarterly field team meetings to improve the safety
 culture. These measures can address gaps in the safety culture if frontline supervisors
 are able to demonstrate effective communication skills, integrate wildfire hazard topics
 into their observations and meetings, and ensure key individual contributor groups are
 heard.
- Goal of Recommendation: Ensure the supervisor safety observations and quarterly
 operations field team meetings improve employee engagement on wildfire hazards and
 address safety culture gaps.
- Verification Method: In next year's assessment provide a description of how these
 measures were implemented and monitored for quality. Progress should be evident in
 increased positivity in response to the statements "I am regularly asked for my ideas
 and suggestions about wildfire hazards and ways to address them" and "The company
 cares about my opinions" on the 2022 workforce survey.

Liberty Utilities can advance its safety culture with the effective and sustained implementation of these measures.



4.2 Strengthen employee and supervisor training to incorporate human performance reliability skills and techniques

In its 12-month safety culture objectives, Liberty Utilities is focusing employee education on the company's wildfire mitigation efforts, which is necessary and valuable. Education and training efforts can be bolstered (perhaps as a three-year objective) to incorporate human performance reliability concepts and techniques to help Liberty advance toward becoming a learning organization.¹⁶

- **Observation:** Some of Liberty Utilities' lowest scoring statements on the workforce survey were those focusing on setting workers up for success, organizational adaptability, and learning from mistakes, such as "People report mistakes they make, even if others do not notice them," "People focus on one task at a time and avoid distractions," "People have the ability to respond and correct problems and errors before they get out of control," and "We have the right tools for the job." The scores were particularly low for the statement "People focus on one task at a time and avoid distractions" among field-based employees in Project Construction and Transmission/Distribution Operations.
- **Goal of Recommendation:** Augmenting the current employee education and training curriculum by introducing human performance reliability techniques can help Liberty Utilities advance toward becoming a learning organization.
- Verification Method: In next year's assessment provide a description of how the
 employee education was augmented with human performance reliability concepts and
 techniques. Progress should be evident in increased positivity in response to the
 statements "People focus on one task at a time and avoid distractions" and "People
 report mistakes they make, even if others do not notice them" on the 2022 workforce
 survey.

As supervisors and employees gain a better understanding of how mistakes occur, their focus shifts from laying blame to (a) identifying where there is variability in current work processes, (b) implementing failsafe¹⁷ interventions to ensure that consequences are controlled when error occurs, and (c) using lessons learned from mistakes to enhance learning across the organization.

¹⁷ Failsafe: here, a system or plan that comes into operation if something goes wrong or that is put in place to prevent such an occurrence.



¹⁶ Learning Organization: here, an organization skilled at creating, acquiring, and transferring knowledge, and at modifying its behavior to reflect new knowledge and insights.

5. Conclusion

This report provides the findings from Liberty Utility's first Safety Culture Assessment under Public Utilities Code Section 8389(d)(4). It gives Energy Safety a baseline measurement of Liberty Utilities' current safety culture for future comparison. Following the publication of this report, Liberty Utilities may agree to implement its findings to demonstrate "good standing" per Public Utilities Code Section 8389(e)(2).

This process is intended to be complementary to, and not a replacement for, ongoing work to improve safety culture at Liberty Utilities. Energy Safety seeks to develop a longitudinal view of safety culture across electrical corporations to identify best practices and relative gaps, along with an understanding of Liberty Utilities' relative strengths and weaknesses. As stated above, Energy Safety ultimately seeks to assess safety culture outcomes over time and incorporate continuous learning into the SCA process.¹⁸

¹⁸ Safety Culture Assessment: Requirements of Electrical Corporations (2021), p. 3.



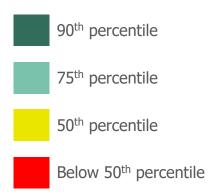
6. Data Attachments

6.1 Workforce Survey Results

The results for the Workforce Survey are displayed on the following pages. In the tables in 6.1.2 "Results by Demographic Questions" and 6.1.3 "Results by Tenure and Level in the Organization" below, the data in the "Null" column represent results from respondents who chose not to respond to the demographic question. For example, in 6.1.2, there were 5 respondents who did not indicate their Level on the survey.

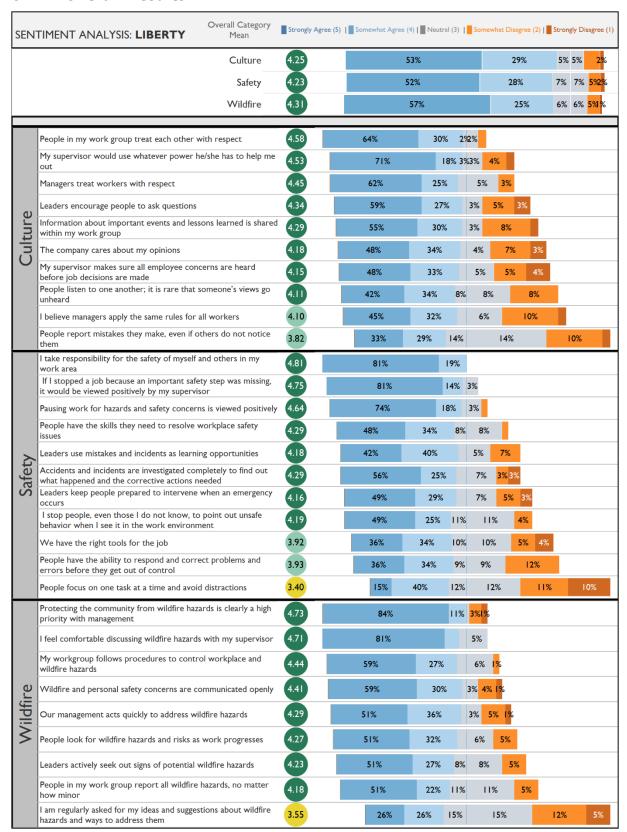
Results are only displayed if a demographic category has five or more responses to protect anonymity.

The colors assigned to average scale scores correspond to percentile scores based on the typical distribution of scores across DEKRA clients evaluating comparable statements using a survey instrument as follows:





6.1.1 Overall Results





6.1.2 Results by Demographic Questions

SURVEY RESULTS by DEMOGRAPHIC: LIBERTY		EMPLOY	EE TYPE	LE,	√EL
LEGEND		Full Time Employee	Contractor	Manager	Individual Contributor
■ High 4.1+ ■ Med High 3.65-4.1 ■ Medium 3.3-3.65 ■ Low <3.3	73	65	8	20	41
Culture Average	4.25	4.24	4.41	4.41	4.11
I believe managers apply the same rules for all workers	4.10	4.05	4.50	4.15	3.93
Information about important events and lessons learned is shared within my work group	4.29	4.26	4.50	4.20	4.22
Leaders encourage people to ask questions	4.34	4.35	4.25	4.45	4.24
Managers treat workers with respect	4.45	4.43	4.63	4.75	4.24
My supervisor makes sure all employee concerns are heard before job decisions are made	4.15	4.11	4.50	4.50	3.88
My supervisor would use whatever power he/she has to help me out	4.53	4.52	4.63	4.50	4.49
People in my work group treat each other with respect	4.58	4.57	4.63	4.75	4.46
People listen to one another; it is rare that someone's views go unheard	4.11	4.09	4.25	4.35	3.88
People report mistakes they make, even if others do not notice them	3.82	3.83	3.75	3.80	3.88
The company cares about my opinions	4.18	4.14	4.50	4.60	3.88
Safety Average	4.23	4.22	4.36	4.33	4.12
Accidents & incidents are investigated completely	4.29	4.31	4.13	4.35	4.22
I stop people to point out unsafe behavior when I see it	4.19	4.18	4.25	4.05	4.20
I take responsibility for the safety of myself and others in my work area	4.81	4.82	4.75	4.90	4.76
Leaders keep people prepared to intervene when an emergency occurs	4.16	4.15	4.25	4.60	3.93
Leaders use mistakes and incidents as learning opportunities	4.18	4.15	4.38	4.25	4.07
Pausing work for hazards and safety concerns is viewed positively	4.64	4.62	4.88	4.70	4.54
People focus on one task at a time and avoid distractions	3.40	3.37	3.63	3.55	3.22
People have the ability to respond and correct problems and errors before they get out of control	3.93	3.88	4.38	4.05	3.71
People have the skills they need to resolve workplace safety issues	4.29	4.32	4.00	4.35	4.32
Stopping a job because a safety step is missing, is viewed positively by my supervisor	4.75	4.74	4.88	4.85	4.66
We have the right tools for the job	3.92	3.85	4.50	4.00	3.73
Wildfire Average	4.31	4.31	4.29	4.56	4.16
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.55	3.57	3.38	4.20	3.24
I feel comfortable discussing wildfire hazards with my supervisor	4.71	4.71	4.75	5.00	4.54
Leaders actively seek out signs of potential wildfire hazards	4.23	4.25	4.13	4.60	4.05
My workgroup follows procedures to control workplace and wildfire hazards	4.44	4.42	4.63	4.55	4.29
Our management acts quickly to address wildfire hazards	4.29	4.32	4.00	4.70	4.07
People in my work group report all wildfire hazards, no matter how minor	4.18	4.17	4.25	4.30	4.10
People look for wildfire hazards and risks as work progresses	4.27	4.28	4.25	4.30	4.24
Protecting the community from wildfire hazards is clearly a high priority with management	4.73	4.74	4.63	4.95	4.61
Wildfire and personal safety concerns are communicated openly	4.41	4.38	4.63	4.45	4.29



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WILDFIRE HAZARD ACTIVITIES: LIBERTY		Community engagement	Grid operations	Monitoring weather for wildfire risk	PSPS initiation and re-	Vegetation assessment and	PSPS risk	Wildfire data collection and tracking	Wildfire emergency planning and	Other
	and repair (14	13	15	energization	mitigation	17	21	preparation 18	20
High 4.1+ ■ Med High 3.65-4.1 Medium 3.3-3.65 Low <3.3	19				12	16	17			20
Culture Average	3.87	4.53	4.14	4.30	4.53	4.37	4.24	4.32	4.46	4.15
I believe managers apply the same rules for all workers	3.84	4.36	4.15	4.20	4.08	4.56	4.18	4.14	4.17	4.00
Information about important events and lessons learned is shared within my work group	3.89	4.71	4.23	4.73	4.75	4.69	4.35	4.52	4.67	4.00
Leaders encourage people to ask questions	3.74	4.57	4.08	4.07	4.58	4.13	3.94	4.48	4.50	4.35
Managers treat workers with respect	4.26	4.64	4.31	4.60	4.75	4.69	4.71	4.62	4.56	4.40
My supervisor makes sure all employee concerns are heard before job decisions are made	3.74	4.50	3.92	4.20	4.67	4.38	4.29	4.33	4.44	4.00
My supervisor would use whatever power he/she has to help me out	4.16	4.64	4.15	4.47	4.83	4.56	4.53	4.57	4.56	4.25
People in my work group treat each other with respect	4.21	4.71	4.46	4.53	4.75	4.56	4.59	4.57	4.61	4.60
People listen to one another; it is rare that someone's views go unheard	3.63	4.57	4.08	4.07	4.25	4.25	4.06	4.19	4.39	4.00
People report mistakes they make, even if others do not notice them	3.47	4.14	3.92	4.07	4.17	3.81	3.71	3.71	4.17	3.55
The company cares about my opinions	3.74	4.43	4.08	4.07	4.42	4.06	4.06	4.10	4.50	4.30
Safety Average	4.09	4.53	4.10	4.35	4.47	4.27	4.24	4.31	4.54	4.19
Accidents & incidents are investigated completely	4.00	4.57	4.00	4.33	4.50	4.38	4.12	4.43	4.56	4.20
I stop people to point out unsafe behavior when I see it	4.21	4.43	4.46	4.27	4.42	4.00	4.12	4.14	4.39	4.15
I take responsibility for the safety of myself and others in my work area	4.89	4.93	4.85	4.73	5.00	4.81	4.94	4.90	4.94	4.75
Leaders keep people prepared to intervene when an emergency occurs	3.89	4.29	3.92	4.40	4.33	4.00	4.53	4.57	4.56	4.30
Leaders use mistakes and incidents as learning opportunities	3.68	4.36	3.92	4.20	4.42	4.31	4.06	4.33	4.56	4.10
Pausing work for hazards and safety concerns is viewed positively	4.63	4.79	4.31	4.67	4.83	4.56	4.76	4.71	4.72	4.65
People focus on one task at a time and avoid distractions	3.21	3.93	3.15	3.60	3.92	3.50	3.24	3.29	4.00	3.15
People have the ability to respond and correct problems and errors before they get out of contro	3.63	4.57	3.77	4.27	4.17	4.19	3.82	3.86	4.39	3.75
People have the skills they need to resolve workplace safety issues	4.11	4.57	4.23	4.47	4.67	4.19	4.24	4.43	4.56	4.30
Stopping a job because a safety step is missing, is viewed positively by my supervisor	4.79	4.93	4.69	4.80	5.00	4.81	4.88	4.86	4.89	4.65
We have the right tools for the job	3.89	4.50	3.77	4.13	3.92	4.19	3.88	3.86	4.33	4.05
Wildfire Average	4.15	4.58	4.26	4.50	4.59	4.40	4.51	4.53	4.72	4.24
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.32	3.79	3.69	4.00	3.83	3.75	4.35	4.00	4.22	3.35
I feel comfortable discussing wildfire hazards with my supervisor	4.63	4.86	4.69	4.87	5.00	4.81	5.00	5.00	4.94	4.65
Leaders actively seek out signs of potential wildfire hazards	4.00	4.43	4.08	4.47	4.50	4.25	4.53	4.57	4.78	4.30
My workgroup follows procedures to control workplace and wildfire hazards	4.26	4.79	4.46	4.60	4.67	4.50	4.35	4.52	4.67	4.30
Our management acts quickly to address wildfire hazards	4.00	4.57	4.00	4.33	4.58	4.25	4.59	4.62	4.89	4.35
People in my work group report all wildfire hazards, no matter how minor	4.16	4.57	4.23	4.40	4.33	4.25	4.12	4.29	4.56	4.05
People look for wildfire hazards and risks as work progresses	4.21	4.57	4.23	4.47	4.75	4.50	4.29	4.38	4.72	4.10
Protecting the community from wildfire hazards is clearly a high priority with management	4.47	4.71	4.54	4.53	4.92	4.69	4.76	4.76	5.00	4.80
Wildfire and personal safety concerns are communicated openly	4.26	4.93	4.38	4.80	4.75	4.56	4.59	4.67	4.72	4.30



RESULTS by LOCATION: LIBERTY	North Lake	South Lake
LEGEND		
■ High 4.1+ ■ Med High 3.65-4.1 ■ Medium 3.3-3.65 ■ Low <3.3	44	19
Culture Average	4.18	4.28
I believe managers apply the same rules for all workers	4.09	3.84
Information about important events and lessons learned is shared within my work group	4.23	4.26
Leaders encourage people to ask questions	4.32	4.37
Managers treat workers with respect	4.34	4.63
My supervisor makes sure all employee concerns are heard before job decisions are made	4.02	4.21
My supervisor would use whatever power he/she has to help me out	4.41	4.74
People in my work group treat each other with respect	4.50	4.68
People listen to one another; it is rare that someone's views go unheard	4.07	4.05
People report mistakes they make, even if others do not notice them	3.84	3.68
The company cares about my opinions	4.00	4.37
Safety Average	4.24	4.12
Accidents & incidents are investigated completely	4.32	4.32
I stop people to point out unsafe behavior when I see it	4.18	4.11
I take responsibility for the safety of myself and others in my work area	4.84	4.74
Leaders keep people prepared to intervene when an emergency occurs	4.20	3.95
Leaders use mistakes and incidents as learning opportunities	4.20	3.95
Pausing work for hazards and safety concerns is viewed positively	4.59	4.63
People focus on one task at a time and avoid distractions	3.34	3.37
People have the ability to respond and correct problems and errors before they get out of control	3.86	3.84
People have the skills they need to resolve workplace safety issues	4.39	4.16
Stopping a job because a safety step is missing, is viewed positively by my supervisor	4.73	4.74
We have the right tools for the job	3.93	3.53
Wildfire Average	4.36	4.15
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.80	3.00
I feel comfortable discussing wildfire hazards with my supervisor	4.70	4.68
Leaders actively seek out signs of potential wildfire hazards	4.32	4.00
My workgroup follows procedures to control workplace and wildfire hazards	4.45	4.37
Our management acts quickly to address wildfire hazards	4.32	4.26
People in my work group report all wildfire hazards, no matter how minor	4.23	3.95
People look for wildfire hazards and risks as work progresses	4.39	3.95
Protecting the community from wildfire hazards is clearly a high priority with management	4.70	4.79
Wildfire and personal safety concerns are communicated openly	4.36	4.37



RESULTS by BUSINESS UNIT: LIBERTY		Project Construction (PMs, Inspectors	Regulatory / Compliance	Transmission/ Distribution Operations	Null
High 4.1+ ■ Med High 3.65-4.1 ■ Medium 3.3-3.65 ■ Low <3.3		10	9	26	5
Culture Average	4.84	4.16	4.48	4.11	3.98
I believe managers apply the same rules for all workers	4.71	3.80	4.11	4.04	3.20
Information about important events and lessons learned is shared within my work group	4.71	4.00	4.78	4.31	4.00
Leaders encourage people to ask questions	5.00	4.20	4.67	4.19	4.60
Managers treat workers with respect	4.86	4.40	4.44	4.35	4.00
My supervisor makes sure all employee concerns are heard before job decisions are made	4.86	4.20	4.22	3.88	4.00
My supervisor would use whatever power he/she has to help me out	5.00	4.50	4.67	4.38	4.60
People in my work group treat each other with respect	5.00	4.60	4.67	4.50	3.80
People listen to one another; it is rare that someone's views go unheard	4.86	4.00	4.44	3.88	3.80
People report mistakes they make, even if others do not notice them	4.43	3.90	4.44	3.69	3.80
The company cares about my opinions	5.00	4.00	4.33	3.85	4.00
Safety Average	4.60	4.12	4.66	4.10	3.96
Accidents & incidents are investigated completely	4.71	4.40	4.78	4.23	4.20
I stop people to point out unsafe behavior when I see it	4.43	3.70	4.67	4.23	3.80
I take responsibility for the safety of myself and others in my work area	5.00	4.80	4.89	4.77	4.40
Leaders keep people prepared to intervene when an emergency occurs	4.57	4.40	4.89	3.73	3.80
Leaders use mistakes and incidents as learning opportunities	4.71	4.10	4.56	4.00	4.20
Pausing work for hazards and safety concerns is viewed positively	5.00	4.60	4.89	4.46	4.40
People focus on one task at a time and avoid distractions	3.86	3.00	3.89	3.35	3.40
People have the ability to respond and correct problems and errors before they get out of control	4.57	3.40	4.44	3.81	3.80
People have the skills they need to resolve workplace safety issues	4.29	4.50	4.78	4.19	4.20
Stopping a job because a safety step is missing, is viewed positively by my supervisor	5.00	4.80	4.89	4.62	4.40
We have the right tools for the job	4.43	3.60	4.56	3.73	3.00
Wildfire Average	4.57	4.38	4.63	4.17	3.96
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.29	3.60	4.00	3.58	2.80
I feel comfortable discussing wildfire hazards with my supervisor	5.00	4.90	5.00	4.50	4.20
Leaders actively seek out signs of potential wildfire hazards	4.71	4.20	4.78	3.92	4.00
My workgroup follows procedures to control workplace and wildfire hazards		4.50	4.89	4.31	4.00
Our management acts quickly to address wildfire hazards		4.60	4.56	3.92	4.40
People in my work group report all wildfire hazards, no matter how minor		4.30	4.22	4.15	3.60
People look for wildfire hazards and risks as work progresses	4.43	4.30	4.67	4.31	3.80
Protecting the community from wildfire hazards is clearly a high priority with management	5.00	4.90	4.67	4.54	4.80
Wildfire and personal safety concerns are communicated openly	4.86	4.10	4.89	4.27	4.00



6.1.3 Results by Tenure and Level in the Organization

SURVEY RESULTS by TENURE: LIBERTY			TEN	URE	
LEGEND	OVERALL	0-1 Years	2-5 Years	6-10 Years	10+ Years
High 4.1+ Med High 3.65-4.1 Medium 3.3-3.65 Low <3.3	73	18	22	14	11
Culture Average	4.25	4.63	4.30	3.72	4.12
I believe managers apply the same rules for all workers	4.10	4.72	4.00	3.29	4.00
Information about important events and lessons learned is shared within my work group	4.29	4.39	4.41	3.79	4.36
Leaders encourage people to ask questions	4.34	4.67	4.50	3.93	4.09
Managers treat workers with respect	4.45	4.83	4.50	3.93	4.27
My supervisor makes sure all employee concerns are heard before job decisions are made	4.15	4.56	4.18	3.71	3.73
My supervisor would use whatever power he/she has to help me out	4.53	4.78	4.64	4.07	4.45
People in my work group treat each other with respect	4.58	4.94	4.55	4.14	4.55
People listen to one another; it is rare that someone's views go unheard	4.11	4.56	4.18	3.29	4.18
People report mistakes they make, even if others do not notice them	3.82	4.17	3.86	3.29	3.91
The company cares about my opinions	4.18	4.72	4.14	3.79	3.64
Safety Average	4.23	4.46	4.24	3.86	4.22
Accidents & incidents are investigated completely	4.29	4.61	4.45	3.71	4.27
I stop people to point out unsafe behavior when I see it	4.19	4.33	4.23	4.00	4.09
I take responsibility for the safety of myself and others in my work area	4.81	4.94	4.82	4.64	4.82
Leaders keep people prepared to intervene when an emergency occurs	4.16	4.72	4.05	3.79	3.91
Leaders use mistakes and incidents as learning opportunities	4.18	4.44	4.32	3.71	3.91
Pausing work for hazards and safety concerns is viewed positively	4.64	4.89	4.59	4.36	4.55
People focus on one task at a time and avoid distractions	3.40	3.67	3.45	2.86	3.36
People have the ability to respond and correct problems and errors before they get out of control	3.93	4.11	3.95	3.29	4.09
People have the skills they need to resolve workplace safety issues	4.29	4.33	4.23	4.14	4.73
Stopping a job because a safety step is missing, is viewed positively by my supervisor	4.75	4.83	4.77	4.57	4.73
We have the right tools for the job	3.92	4.22	3.73	3.43	4.00
Wildfire Average	4.31	4.68	4.27	3.99	4.22
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.55	4.50	3.18	3.00	3.55
I feel comfortable discussing wildfire hazards with my supervisor	4.71	4.89	4.77	4.43	4.64
Leaders actively seek out signs of potential wildfire hazards	4.23	4.78	4.09	4.00	4.00
My workgroup follows procedures to control workplace and wildfire hazards	4.44	4.67	4.59	3.79	4.45
Our management acts quickly to address wildfire hazards	4.29	4.72	4.23	4.14	4.09
People in my work group report all wildfire hazards, no matter how minor	4.18	4.39	4.18	3.93	4.09
People look for wildfire hazards and risks as work progresses	4.27	4.56	4.14	4.14	4.27
Protecting the community from wildfire hazards is clearly a high priority with management	4.73	4.94	4.77	4.71	4.36
Wildfire and personal safety concerns are communicated openly	4.41	4.67	4.45	3.79	4.55



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Organizational Level by Job & Tenure LIBERTY	Organizational Level by Job & Tenure						
		Individual	Contributor		Man	ager	
LEGEND	0-1 Years	2-5 Years	6-10 Years	10+ Years	0-1 Years	2-5 Years	
■ High 4.1+ ■ Med High 3.65-4.1 ■ Medium 3.3-3.65 ■ Low <3.3	12	13	10	6	6	7	
Culture Average	4.63	4.02	3.74	3.88	4.63	4.70	
I believe managers apply the same rules for all workers	4.83	3.77	3.00	4.00	4.50	4.29	
Information about important events and lessons learned is shared within my work group	4.50	4.15	3.90	4.33	4.17	4.71	
Leaders encourage people to ask questions	4.75	4.23	4.00	3.67	4.50	4.86	
Managers treat workers with respect	4.83	4.23	3.80	3.83	4.83	5.00	
My supervisor makes sure all employee concerns are heard before job decisions are made	4.50	3.69	3.60	3.50	4.67	4.86	
My supervisor would use whatever power he/she has to help me out	4.75	4.46	4.40	4.17	4.83	4.86	
People in my work group treat each other with respect	4.92	4.31	4.20	4.33	5.00	4.86	
People listen to one another; it is rare that someone's views go unheard	4.50	3.77	3.30	3.83	4.67	4.71	
People report mistakes they make, even if others do not notice them	4.17	3.85	3.50	4.00	4.17	4.00	
The company cares about my opinions	4.58	3.69	3.70	3.17	5.00	4.86	
Safety Average	4.48	4.03	3.83	4.09	4.42	4.52	
Accidents & incidents are investigated completely	4.75	4.15	3.80	4.00	4.33	4.86	
I stop people to point out unsafe behavior when I see it	4.33	4.15	4.00	4.33	4.33	4.14	
I take responsibility for the safety of myself and others in my work area	4.92	4.77	4.50	4.83	5.00	4.86	
Leaders keep people prepared to intervene when an emergency occurs	4.67	3.69	3.60	3.50	4.83	4.71	
Leaders use mistakes and incidents as learning opportunities	4.42	4.08	3.80	3.83	4.50	4.71	
Pausing work for hazards and safety concerns is viewed positively	5.00	4.46	4.30	4.17	4.67	4.71	
People focus on one task at a time and avoid distractions	3.67	3.08	2.90	3.17	3.67	4.00	
People have the ability to respond and correct problems and errors before they get out of control	4.00	3.54	3.30	4.17	4.33	4.43	
People have the skills they need to resolve workplace safety issues	4.42	4.08	4.20	4.83	4.17	4.57	
Stopping a job because a safety step is missing, is viewed positively by my supervisor	4.83	4.69	4.40	4.67	4.83	4.86	
We have the right tools for the job	4.33	3.62	3.30	3.50	4.00	3.86	
Wildfire Average	4.69	3.97	3.86	4.04	4.67	4.76	
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	4.33	2.69	2.60	3.33	4.83	4.00	
I feel comfortable discussing wildfire hazards with my supervisor	4.83	4.62	4.20	4.33	5.00	5.00	
Leaders actively seek out signs of potential wildfire hazards	4.92	3.77	3.70	3.50	4.50	4.71	
My workgroup follows procedures to control workplace and wildfire hazards		4.31	3.80	4.33	4.67	5.00	
Our management acts quickly to address wildfire hazards		3.69	4.00	3.83	4.83	5.00	
People in my work group report all wildfire hazards, no matter how minor		3.85	4.00	4.17	4.33	4.86	
People look for wildfire hazards and risks as work progresses	4.58	4.00	4.10	4.33	4.50	4.43	
Protecting the community from wildfire hazards is clearly a high priority with management	4.92	4.62	4.60	4.00	5.00	5.00	
Wildfire and personal safety concerns are communicated openly	4.83	4.15	3.70	4.50	4.33	4.86	



6.2 Safety Culture Objectives

The text in the tables below, other than the instructions and headings, is as it was received from the electrical corporation, presented without revision.

Instructions

Provide a description of the electrical corporation's objectives with respect to safety culture, over the next 12 months and over the next 3 years.

6.2.1 Safety Culture Objectives for the next 12 months

A. Objective	B. Progress metrics or cultural indicators used to track progress	C. Target for 12 months from submission	D. Description of how this objective will reduce wildfire risk to the public or risk to employees conducting wildfire mitigation work
Frontline Awareness and Education	Documented training	Hold wildfire mitigation training for staff	Educating staff members about Liberty's wildfire mitigation efforts provides a company- wide understanding of the risk to be mitigated as well as potential workplace hazards. An educated staff can also help to inform the local community.
Safety Observations	Number of safety observations reported	Field Supervisors/Manage rs = 24/year (each) VP/State/Regional Pres = 12/year (each) Senior VP = 6/year (each) Executive = 4/year (each)	Identification and reporting of near misses and safety incidents provides educational opportunities across the company. By sharing these observations, employees become more educated about workplace hazards and are more likely to avoid incidents in the future.
Evaluation and rollout of Wildfire Safety Culture survey results	Note: metrics to be identified upon receipt of survey results to understand how the survey is scored, ranked, weighted, etc.	Identify safety culture areas of improvement.	In year one, survey results will establish a baseline understanding of Liberty's safety culture. Identifying areas of improvement provides opportunity to improve safety culture. Companies with strong safety culture are more likely to identify safety concerns and resolve them before an incident occurs.



A. Objective	B. Progress metrics or cultural indicators used to track progress	C. Target for 12 months from submission	D. Description of how this objective will reduce wildfire risk to the public or risk to employees conducting wildfire mitigation work
Operations ¹⁹ field team meetings	Quarterly meetings with field teams.	Establish team of field representatives from operations departments. Hold quarterly meetings to review WMP implementation, receive feedback, and identify areas to improve processes and/or standards	This objective provides the opportunity to review WMP initiatives, safety culture survey results, and safety concerns with team members who are actively involved with WMP implementation. This provides another opportunity for employees to highlight initiative concerns, suggest program improvements, and voice opinions related to WMP programs and safety culture.
Leadership safety culture review	Bi-weekly meetings	Operations and safety management meetings to review and resolve safety issues.	Reviewing safety incidents and concerns on a regular basis promotes safety as a top priority for the management team. These meetings provide leadership with a current understanding of safety issues that need to be resolved and serve as a constant reminder to continually lead by example and hold team members responsible for safe work practices.
Safety Moments	Conduct safety moments at meetings	Start every meeting with 5 or more people by presenting a safety topic.	Safety moments provide an opportunity for team members to take a minute to discuss safety observations or concerns. They serve as a constant reminder of workplace hazards and how to avoid them.

¹⁹ Operations: here, refers to the parts of a business that affect the production, distribution, and service necessary for a company to function. For Energy Safety's purposes, electrical operations, field services, transmissions, substations, and distribution are considered in operations, but generation is not.



6.2.2 Safety Culture Objectives for the next 3 years

A. Objective	B. Progress metrics or cultural indicators used to track progress against this objective	C. Target for 3 years from submission	D. Description of how this objective will reduce wildfire risk to the public or risk to employees conducting wildfire mitigation work
Improved Wildfire Safety Culture survey results	Percent improvement from previous year	Year over year increase in survey results	Improving safety culture survey results may reflect an improvement in the company's overall safety culture. Companies with strong safety culture are more likely to identify safety concerns and resolve them before an incident occurs.
Safety Stand Downs	Annual pre-fire season safety stand-down.	Hold pre-fire season safety stand-down every year.	Safety stand-downs are an opportunity to suspend daily work activities and take time to focus on safety-related matters. Safety stand-downs can involve trainings (fire tool safety, Fire Prevention Plan refreshers, fire extinguisher training, etc.) and vehicle inspections, so required tools and equipment are in working order.
Improved risk analysis	Risk based decision making framework and risk mapping	Continue to improve risk-based decision-making framework and risk analysis inputs	Liberty's risk analysis and risk informed decision making framework is relatively new. Utilizing this framework to inform initiative selection helps to geographically prioritize wildfire mitigation efforts and improve effectiveness. Continuing to develop risk models and data inputs will increase Liberty's risk awareness and help to target wildfire mitigation efforts more effectively.



6.3 Lessons Learned

The text in the tables below, other than the instructions and headings, is as it was received from the electrical corporation, presented without revision.

Instructions

Describe how the electrical corporation's objectives and priorities with respect to safety culture have evolved over the past year. Outline any major themes and lessons learned over the past 12 months and subsequent actions taken. If you have not completed a safety culture assessment in over three years, consider your safety culture as it exists today and describe the major themes that exist today.

6.3.1 Lessons Learned since most recent Safety Culture Assessment

A. Major Themes or Lessons Learned	B. Actions Taken
Wildfire safety and PSPS preparedness outreach	Throughout the year, Liberty executed comprehensive wildfire safety and PSPS preparedness outreach, using lessons learned and feedback received from other IOUs, customers, the Commission, and other stakeholders. Liberty also conducts community outreach to educate public safety partners, customers, and the general public about aspects of its wildfire mitigation practices, such as vegetation management and system hardening, and the role they play in helping to reduce wildfire risks in their communities.
Safety culture elements of employee engagement survey are trending favorably	Liberty makes continued efforts to provide employees appropriate training needed to perform their jobs safely. Employees feel increasingly positive about safety issues in their work areas being addressed quickly and that management supports and participates in health and safety trainings.
Significant Incident Review	Senior management holds monthly calls at the corporate level to review safety incidents, injuries, motor vehicle accidents, etc. These meetings help to identify safety trends and areas of improvement for the company and help to prevent future incidents.



7. Glossary of Terms

Term	Definition
Behavior- Based Safety (BBS)	A broad term used to describe programs for improving workplace safety by observing and analyzing employees' behavior while they work.
Black Swan	Unpredictable events that are beyond what is normally expected and have potentially severe consequences.
CPUC Reportable Ignition	A fire-related event meeting the following conditions: (1) A self-propagating fire of material other than electrical and/or communication facility, (2) The resulting fire traveled greater than one linear meter from the ignition point, (3) The electrical corporation has knowledge that the fire occurred. Electrical corporations must submit to the CPUC information about this event that is useful in identifying operational and/or environmental trends relevant to the event. (See CPUC Decision 06-04-044 and Resolution E-4184.)
Drills	Coordinated, supervised activities designed to test work team responses to various planned upset conditions.
Event Learning	An approach to understanding incidents and events that evaluates the entire system leading to an event to better understand the causes of actions. The focus of event learning is primarily on how to alter the system to make it less likely for the factors that caused the event to recur rather than to assign blame or define a single root cause factor.
Executive Leadership	The highest level of management in an organization, reports to the CEO.
Exposure	A state of vulnerability to injury that exists when a person comes in contact with a hazard. Exposure reduction or exposure control results from separating the person from the hazard and protecting the person from the vulnerability raised by the hazard (for example, by wearing protective equipment).
Exposure Management Training	A training that emphasizes a proactive approach to safety through identifying and controlling exposure for self and others and is foundational for leaders to move beyond the traditional and reactive incident management approach to safety.



Term	Definition
Failsafe	A system or plan that comes into operation in the event of something going wrong or that is there to prevent such an occurrence.
Frontline Supervisors	The first level of leadership that has direct oversight of employees within operational units of the organization.
High Risk Situations	Work activities or situations that have previously been shown in incident data to be consistent with serious or fatal incidents.
High Value Controls	The hierarchy of controls consists of five layers of defenses used to protect against hazards in the workplace ranging from the most effective (Elimination) to the least effective (personal protective equipment or PPE). The layers are Elimination, Substitution, Engineering, Administrative, and PPE. High value controls are Elimination, Substitution, and Engineering because the effectiveness of the control is not susceptible to human error.
Human Performance Reliability	The suite of knowledge, skills and capabilities required to anticipate, control, and respond to unplanned issues and error.
Incident	An unplanned, undesired event that adversely affects normal operations.
Individual Contributor	An employee who is not in a management position or has any employees directly reporting to them.
IOU	Investor-owned utility.
ITO	Independent transmission operator.
Lagging Indicator	An outcome or output measure that is backward-looking, describing a past event.
Leading Indicator	An input measure that is predictive of a future event.
Learning Organization	An organization skilled at creating, acquiring, and transferring knowledge, and at modifying its behavior to reflect new knowledge and insights.
Likert Scale	A rating system commonly used in questionnaires and survey research to measure people's attitudes, perceptions, and opinions.



Term	Definition
Near Miss	An unplanned event that did not result in injury, illness, or damage, but had the potential to do so.
Operations	The parts of a business that affect the production, distribution, and service necessary for a company to function. For the purposes of this assessment, electrical operations, field services, transmissions, substations, and distribution are considered part of operations, but generation is not.
Operational Leadership	Levels of management within operations ranging from frontline supervisors (who have direct oversight of employees) to executive level senior operational leaders (e.g., COO).
OSHA Reportable Incidents	Fatal and extremely serious injuries or illnesses, such as amputation, eye loss, in-patient hospitalization, or fatality, required to be reported to OSHA within defined time periods. "OSHA" stands for the Occupational Safety and Health Administration of the United States Department of Labor.
Root Cause Analysis	A systematic process for identifying root causes of problems or events and an approach for responding to them.
SMJUs	Small and multi-jurisdictional utilities.
Systemic Risk	Vulnerabilities that could result in cascading or broad failures across the utility.
Upset Conditions	Interruptions in the regular running of work processes or other planned activity.
Weak Signal	An indicator of a potentially emerging issue that may become significant in the future.

