



May 8, 2023

Paul Marconi
President
Bear Valley Electric Service
630 East Foothills Blvd.
San Dimas, CA 91733
Paul.Marconi@bvesinc.com

**Subject: Office of Energy Infrastructure Safety Issuance of Bear Valley Electric Service's
2022 Safety Culture Assessment per Public Utilities Code Section 8389(d)(4)**

Dear Mr. Marconi:

Enclosed is the 2022 Safety Culture Assessment (SCA) report for Bear Valley Electric Service, Inc., (BVES) presenting the findings (including recommendations) of the assessment conducted by the National Safety Council (NSC) on behalf of the Office of Energy Infrastructure Safety (Energy Safety) pursuant to Public Utilities Code Section 8389(d)(4).

Energy Safety provided BVES a draft of the report on March 17, 2023, for factual review and correction. BVES did not submit a response.

BVES can satisfy the "good standing" requirement in Public Utilities Code section 8389(e)(2) by agreeing to implement the findings (including recommendations) of its most recent SCA performed pursuant to Public Utilities Code section 8386.2 and section 8389(d)(4), if applicable. This may be done by submitting a letter to this effect via the e-filing system on the 2022 Safety Culture Assessments docket (Docket #2022-SCAs).¹

Sincerely,

A handwritten signature in black ink that reads 'Lucy C. Morgans'.

Lucy Morgans
Program Manager, Electric Safety Policy Division
Office of Energy Infrastructure Safety

¹ [See the 2022 Safety Culture Assessments docket](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-SCAs)

(<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-SCAs>, accessed March 20, 2023).



OFFICE OF ENERGY
INFRASTRUCTURE
SAFETY



The Office of Energy Infrastructure Safety's 2022 Safety Culture Assessment Bear Valley Electric Service, Inc.

Prepared by the National Safety Council

Published May 2023





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Executive Summary

The Office of Energy Infrastructure Safety's (Energy Safety's) second annual Safety Culture Assessment of electrical corporations in California took place from July to November 2022. Energy Safety directed the process pursuant to the requirements of Public Utilities Code section 8389(d)(4). The process was carried out by Energy Safety's Safety Culture Assessment contractor. In 2022, Energy Safety's Safety Culture Assessment contractor was the National Safety Council.

This report contains the assessment of Bear Valley Electric Service, Inc.'s (BVES's) inputs to the 2022 Safety Culture Assessment and associated findings and recommendations. The findings and recommendations are based on BVES's inputs including its safety culture objectives, lessons learned, progress on 2021 recommendations, and a workforce survey targeted at those who spend at least 10 percent of their time engaged in wildfire mitigation activities.

According to its Safety Culture Assessment inputs in 2021 and 2022, BVES has maintained a strong focus on wildfire safety. Respondents to the 2022 workforce survey answered positively regarding BVES' safety culture, with the wildfire safety statement category generating the highest category score and showing the greatest year-over-year improvements since 2021. Seven of the eight highest-performing workforce survey statements in 2022 were in the wildfire safety category. The highest-scoring survey statement in the wildfire safety category in 2022 was "My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)."

BVES's workforce survey results, safety culture objectives, lessons learned, and progress on 2021 recommendations indicated improved employee engagement since 2021. BVES specified several actions it has taken since 2021 to provide employees the



opportunity to express their opinions including leadership participating in monthly safety committee meetings, supervisors holding weekly meetings, and weekly meetings with BVES leadership and contractor field crews. In addition, the workforce survey statement with the greatest improvement in score since 2021 was “The company cares about my opinions.”

BVES has demonstrated improvement in several areas of its Safety Culture Assessment. However, there are opportunities for further improvement in 2023. This assessment shows that BVES should continue to build on the progress made to date and address remaining safety culture gaps, specifically for contractors and BVES employees from the Design and Construction business unit. Furthermore, BVES should build on strengths described above to improve hazard and near miss management to strengthen a proactive safety culture of early reporting.

To drive improvement in its safety culture throughout the organization, BVES should act on the recommendations listed below.

- In collaboration with BVES’s contractors, BVES should review and refine its current strategic improvement plan to address gaps in overall safety culture for contractors. This plan should propose ways to improve contractor relationships with BVES supervisors and contractor empowerment to address problems in a timely fashion.
- BVES should develop and implement a strategic improvement plan to address the workforce survey result indicating that Design and Construction employees have a less positive experience of safety culture in the wildfire mitigation work context than other employees.
- BVES should strengthen its safety-enabling systems by improving protocols for responding to near misses and hazards, including their reporting and management.



- BVES should further develop and implement the use of specific leading indicators to improve safety and health outcomes in connection with its 12-month goal to establish, collect, and publish a set of safety metrics, including leading indicators, to evaluate safety.

1 Safety Culture Assessment

1.1 Safety Culture Assessment Framework

The Office of Energy Infrastructure Safety's (Energy Safety's) Safety Culture Assessment (SCA) process is described in the Safety Culture Assessment Guidelines for Electrical Corporations (SCA Guidelines).¹ The SCA Guidelines are built on the SCA framework adopted by the California Public Utilities Commission (CPUC) in Resolution WSD-011 on November 19, 2020,² and the update adopted by the CPUC in Resolution M-4860 on December 2, 2021.³ This framework, depicted in Figure 1, is rooted in the belief that safety culture affects both personal and wildfire safety outcomes and by extension its study provides insights into strengths and key opportunities for improvement.

¹ [Safety Culture Assessment Guidelines for Electrical Corporations \(March 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true>, accessed Dec. 14, 2022).

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" \(2020\)](https://energysafety.ca.gov/wp-content/uploads/docs/misc/docket/352490594.pdf) (<https://energysafety.ca.gov/wp-content/uploads/docs/misc/docket/352490594.pdf>, accessed Feb. 8, 2023);

[Resolution WSD-011 Attachment 4 "Annual Safety Culture Assessment Process Proposal" \(2020\)](https://energysafety.ca.gov/wp-content/uploads/docs/wmp-2021/docs/352460864.pdf), p. 9 (<https://energysafety.ca.gov/wp-content/uploads/docs/wmp-2021/docs/352460864.pdf>, accessed Jan. 18, 2023).

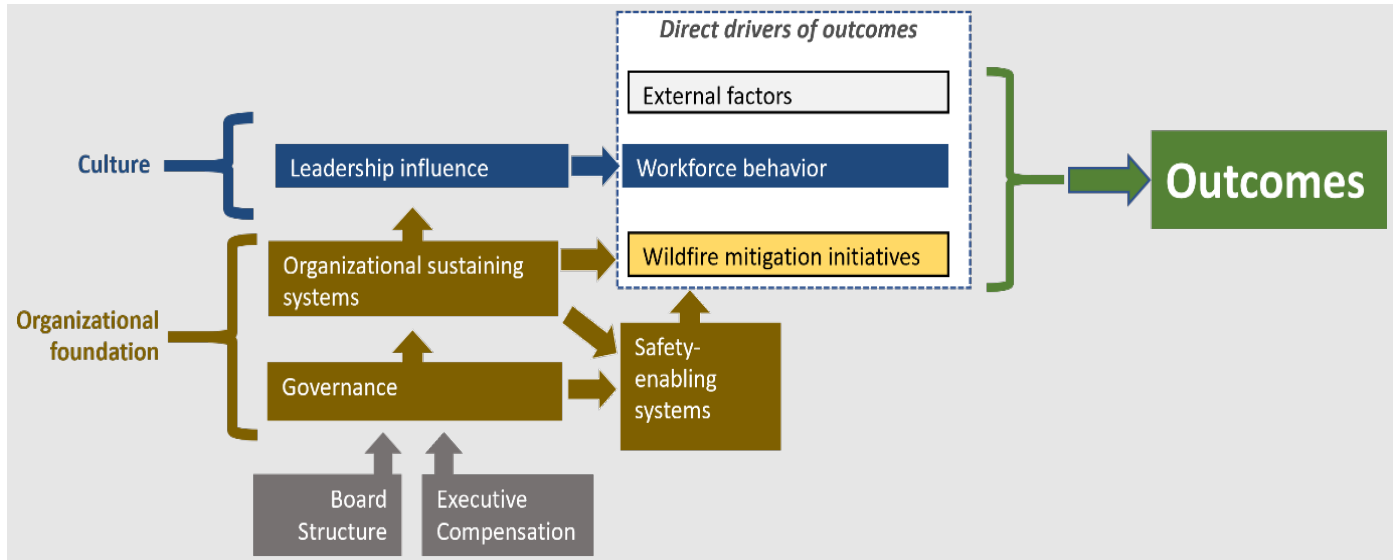
³ [Resolution M-4860 "Resolution Pursuant to the Requirements of Public Utilities Code Sections 8389\(d\)\(1\), \(2\), \(3\) and \(4\), Related to Catastrophic Wildfires Caused by Electrical Corporations Subject to the Commission's Regulatory Authority \(2021\)](https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M428/K722/428722129.PDF)

(<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M428/K722/428722129.PDF>, accessed Feb. 8, 2023);

[Resolution M-4860 Attachment 4 "2022 Safety Culture Assessment Process" \(2021\)](https://energysafety.ca.gov/wp-content/uploads/attachment-4_sca-proposal-for-2022.pdf)

(https://energysafety.ca.gov/wp-content/uploads/attachment-4_sca-proposal-for-2022.pdf, accessed Feb. 8, 2023).

Figure 1: Framework for Energy Safety’s Safety Culture Assessment



The SCA framework illustrates that safety outcomes are driven by leadership influence and organizational sustaining systems. Governance impacts these factors and also safety-enabling systems. These elements all impact workforce behavior and wildfire mitigation initiatives, which most directly drive safety outcomes.

This framework helps assess the value of safety at different levels of an organization. A strong safety culture exhibits the value of safety at all levels of the organization, from the highest levels of leadership to the frontline employee and through all facets of job performance and the factors that influence job performance like work environment, training, tools, and resources. Additionally, a strong safety culture maintains the priority of safety as it relates to production or job performance outcomes, without exception. Measures of safety culture like Energy Safety’s SCA are essential for understanding, managing, and making the necessary interventions to improve safety culture to benefit both workers and the public.

1.2 Overview

Pursuant to Public Utilities Code Section 8389(d)(4),⁴ Energy Safety must conduct an annual SCA for each California electrical corporation.⁵ The first SCA took place in May and June 2021. Energy Safety contracted the National Safety Council (NSC)⁶ to conduct the second annual SCA. This took place between July and November 2022.

1.2.1 Focus of Energy Safety's SCA

Energy Safety's SCA is distinct and complimentary to other safety culture assessments required elsewhere in the Public Utilities Code. Energy Safety's SCA is not a replacement for ongoing work to improve safety culture at each electrical corporation. Energy Safety's SCA specifically focuses on the safety culture present in the wildfire mitigation work setting: the setting most pertinent to risks faced by the wildfire mitigation workforce in terms of personal risk and risks faced by the public in terms of wildfire risk. Energy Safety's goal is to develop a longitudinal view of safety culture across electrical corporations to identify best practices and relative gaps. Energy Safety seeks to understand outcomes over time and incorporate continuous learning into the assessment process.

⁴ [The full text of Public Utilities Code section 8389](https://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8389.&lawCode=PUC)

(https://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8389.&lawCode=PUC, accessed November 15, 2022).

⁵ In 2022, the California electrical corporations required to participate in Energy Safety's Safety Culture Assessment were Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), Liberty Utilities, PacifiCorp, Bear Valley Electric Service, Inc., Horizon West Transmission, and Trans Bay Cable.

⁶ The National Safety Council is a nonprofit, mission-based organization focused on eliminating the leading causes of preventable death and injury, from the workplace to anyplace.

1.2.2 Energy Safety's SCA Components

Energy Safety published the 2022 SCA Guidelines in March 2022.⁷ The SCA Guidelines outline the SCA framework, components, and requirements for each category of electrical corporation. The SCA Guidelines categorize electrical corporations as follows:

- **Large electrical corporations, also called investor-owned utilities⁸ (Large IOUs):** Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE).
- **Small and multijurisdictional utilities (SMJUs):** Liberty Utilities, PacifiCorp, and Bear Valley Electric Service, Inc. (BVES).
- **Independent transmission operators (ITOs):** Horizon West Transmission (HWT) and Trans Bay Cable (TBC).

The 2022 SCA process included a management self-assessment with a summary plan for 2023, 12-month and 3-year safety culture objectives, lessons learned, progress on the 2021 SCA recommendations, a workforce survey, and follow-up interviews to give context and clarity to the management self-assessment (one interview) and workforce survey (three interviews in the form of focus groups). See below for more details about each of these components. The SCA Guidelines require different kinds of electrical corporations to complete different components of the SCA as follows:⁹

⁷ [Safety Culture Assessment Guidelines for Electrical Corporations \(March 2022\)](https://efiling.energy-safety.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true) (https://efiling.energy-safety.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true, accessed Dec. 14, 2022). For more information, see [Energy Safety's Safety Culture Assessments web page](https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-safety/safety-culture-assessments/) (https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-safety/safety-culture-assessments/, accessed Dec. 22, 2022).

⁸ In this document, "utility" should be understood to mean "electrical corporation."

⁹ See Section 1 "Application of Safety Culture Assessment Components to Different Electrical Corporations," [Safety Culture Assessment Guidelines for Electrical Corporations \(March 2022\)](https://efiling.energy-safety.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true) (https://efiling.energy-safety.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true, accessed Dec. 14, 2022).

Component	Electrical corporations that must complete this component	Commentary
Workforce survey	Large IOUs, SMJUs	Energy Safety uses the workforce survey to assess key workforce perceptions and behaviors at the large and small electrical corporations, but not the independent transmission operators, where the workforces are too small to ensure the anonymity of respondents.
Management self-assessment with summary plan for the coming year	Large IOUs	Energy Safety uses the management self-assessment, a detailed assessment of organizational systems, to evaluate the larger, more complex electrical corporations.
Safety culture objectives and summary of lessons learned (including reporting on implementation of recommendations)	Large IOUs, SMJUs, ITOs	Energy Safety uses the safety culture objectives and summary of lessons learned in the evaluation of all electrical corporations. This is the only requirement for ITOs, which are small organizations with a lower risk profile than the large IOUs and SMJUs.
Interviews	To be determined by Energy Safety upon review of submissions	Interviews may be required of any electrical corporation. In 2022, they will be required of the large IOUs.

Component	Electrical corporations that must complete this component	Commentary
Observational visits	To be determined by Energy Safety upon review of submissions	Observational visits may be required of any electrical corporation.
Supporting documentation	To be determined by Energy Safety upon review of submissions	Supporting documentation may be required of any electrical corporation.

Below are descriptions of the different components of the 2022 SCA.

1.2.2.1 Workforce Survey

The workforce survey was administered by NSC (via the electrical corporations) and consisted of 30 statements covering three dimensions of safety culture: wildfire safety, personal safety, and overall culture. These were the same statements as those used on the 2021 workforce survey. It was targeted at employees and contractors who spend at least 10 percent of their time engaged in wildfire mitigation activities. Respondents rated the statements on a five-point scale from strongly agree to strongly disagree.¹⁰

Electrical corporations selected a time period for administration of the workforce survey within the timeframe of August 15 to September 15, 2022. NSC provided electrical corporations with both online and paper survey administration options, as well as Spanish translation upon request.

¹⁰ The survey used a Likert scale going from Strongly Agree (5) to Strongly Disagree (1). NSC calculated average response scores based on the answers of the respondents. For more information on Likert scales, see ["What is a Likert Scale – Definition, example, characteristics, & advantages" by Question Pro](https://www.questionpro.com/blog/what-is-likert-scale/) (https://www.questionpro.com/blog/what-is-likert-scale/, accessed Jan. 18, 2023).

1.2.2.2 Management Self-Assessment with 2023 Summary Plan

The management self-assessment was only completed by the large electrical corporations in the 2022 SCA process; it was not completed by the SMJUs.

1.2.2.3 Safety Culture Objectives, Lessons Learned, and Progress On 2021 Recommendations

Unlike some components of the SCA that are only applicable to some electrical corporations (see Section 1.2.2), each electrical corporation is required to submit its safety culture objectives, summary of lessons learned, and progress on 2021 recommendations.¹¹ Electrical corporations submitted these using an online survey administered by NSC.

In this component, the electrical corporations presented their 12-month and 3-year safety culture objectives, target and progress metrics, and a description of how the objectives will reduce wildfire risk.

Electrical corporations also presented their lessons learned and a description of progress made on their 2021 SCA recommendations.

1.2.2.4 Interviews

Follow-up interviews were only conducted with the large electrical corporations in the 2022 SCA process; they were not conducted with the SMJUs.

1.2.2.5 Observational Visits

The 2022 SCA process did not include observational visits due to time constraints.

¹¹ See Section 1 “Application of Safety Culture Assessment Components to Different Electrical Corporations,” [Safety Culture Assessment Guidelines for Electrical Corporations \(March 2022\)](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true) (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true, accessed Dec. 14, 2022).

1.2.2.6 Supporting Documentation

The SCA Guidelines provide that Energy Safety may ask for supporting documentation.¹² For example, Energy Safety may require documentation to support justifications given for electrical corporations' self-ratings in the management self-assessment.

The online survey used to elicit safety culture objectives, summary of lessons learned, and progress on 2021 recommendations permitted electrical corporations to upload additional supporting documentation as attachments to illustrate actions taken since the 2021 SCA.

1.2.3 Changes from 2021

The SCA process did not change significantly from 2021 to 2022.¹³ There were three key differences. Firstly, in 2022 Energy Safety's SCA contractor could assess each electrical corporation's progress against the baseline data gathered in 2021 and the extent to which the electrical corporation had implemented the 2021 recommendations. Secondly, in 2022 Energy Safety introduced a public workshop to allow the large electrical corporations the opportunity to present information about their safety culture

¹² See the [Safety Culture Assessment Guidelines for Electrical Corporations](#) Section 5.2 for more information about supporting documentation Energy Safety may require at its discretion (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true>, accessed Jan. 23, 2023).

¹³ [Resolution M-4860 "Resolution Pursuant to the Requirements of Public Utilities Code Sections 8389\(d\)\(1\), \(2\), \(3\) and \(4\), Related to Catastrophic Wildfires Caused by Electrical Corporations Subject to the Commission's Regulatory Authority \(2021\)"](#) (<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M428/K722/428722129.PDF>, accessed Feb. 8, 2023); [Resolution M-4860 Attachment 4 "2022 Safety Culture Assessment Process" \(2021\)](#) (https://energysafety.ca.gov/wp-content/uploads/attachment-4_sca-proposal-for-2022.pdf, accessed Feb. 8, 2023).



and the public the opportunity to ask questions.¹⁴ Thirdly, in 2022 the invitees to the workforce survey follow-up focus groups included contractors in addition to electrical corporation employees.

¹⁴ [2022 Safety Culture Assessment Public Workshop](https://energysafety.ca.gov/events-and-meetings/events/2022-safety-culture-assessment-public-workshop/): see link for workshop materials and recording (https://energysafety.ca.gov/events-and-meetings/events/2022-safety-culture-assessment-public-workshop/, accessed Dec. 22, 2022).

2 BVES Inputs and Findings

2.1 BVES Inputs to the SCA

The findings and recommendations below are based on BVES’s inputs to the 2022 SCA including its safety culture objectives, lessons learned, progress on 2021 recommendations,¹⁵ and workforce survey targeting those who spend at least 10 percent of their time engaged in wildfire mitigation activities.¹⁶ As an SMJU, BVES was not required to complete all components of the SCA process.¹⁷

In 2022, the first step of the SCA process was submission of BVES’s safety culture objectives, lessons learned, and progress on 2021 recommendations. BVES submitted these components on August 15, 2022.

NSC (via BVES) next administered the BVES workforce survey using an anonymous online and paper survey, available in English and Spanish, between August 16 and August 30, 2022. NSC encouraged BVES to include as many individuals as possible within the target audience of employees and contractors who spend at least 10 percent of their time engaged in wildfire mitigation activities.

A total of 57 BVES employees and contractors responded to the workforce survey. BVES achieved an 88 percent overall response rate for the pre-selected wildfire mitigation workgroups (total BVES employees and contractors), approximately the same

¹⁵ See Section 5.2 “BVES Safety Culture Objectives, Lessons Learned, and 2021 Recommendations Report.”

¹⁶ See Section 5.1 “Workforce Survey Results.”

¹⁷ See Section 1 “Application of Safety Culture Assessment Components to Different Electrical Corporations,” [Safety Culture Assessment Guidelines for Electrical Corporations \(March 2022\)](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true) (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true, accessed Dec. 14, 2022).

as BVES’s response rate in 2021 (89 percent).¹⁸ BVES elicited 11 contractor responses out of a base number of 28 contractors, a 39 percent response rate compared with 92 percent in 2021 (11 contractor responses out of 12).

2.2 Strengths

Through its SCA inputs, BVES demonstrated a number of safety culture strengths. The following sections identify these strengths. BVES should continue to build on these strengths to advance its safety culture.

2.2.1 Focus on Wildfire Safety

BVES’s 2022 workforce survey results indicated that it maintained a strong focus on wildfire safety. In 2022, the wildfire safety category achieved an average response score¹⁹ of 4.46 (out of a possible 5) in 2022, an increase of 0.21 from BVES’s 2021 average response score of 4.25. While BVES’s workforce survey results showed improvement overall and within each of the three categories (wildfire safety, personal safety, and overall culture) assessed in the survey, the wildfire safety category had the greatest increase in average response score.

Additionally, seven of the eight highest-performing workforce survey statements in 2022 were in the wildfire safety category. The highest-scoring survey statement in the wildfire safety category in 2022 was “My workgroup consistently follows procedures to control

¹⁸ In comparison, the 2022 workforce overall survey response rate for Liberty Utilities was 63 percent (77 percent for employees and 29 percent for contractors). For PacifiCorp the 2022 overall workforce survey response rate was 56 percent (52 percent for employees and 56 percent for contractors).

¹⁹ The workforce survey is comprised of 30 statements rated on a five-point Likert scale from Strongly Agree (5) to Strongly Disagree (1). NSC calculated average response scores based on the answers of the respondents. For more information on Likert scales, see [“What is a Likert Scale – Definition, example, characteristics, & advantages” by Question Pro](https://www.questionpro.com/blog/what-is-likert-scale/) (https://www.questionpro.com/blog/what-is-likert-scale/, accessed Jan. 18, 2023).

workplace hazards in our work areas (including procedures specific to wildfire hazards),” with 83 percent of respondents reported agreement with this item, of which 60 percent strongly agreed. This statement scored in the bottom third for BVES in 2021 while in 2022 it was the second-highest scoring statement with an average response score of 4.60, an increase of 0.62.

Further, six additional survey statements in the wildfire safety category showed improvement in average response score since 2021. In particular, “I am regularly asked for my ideas and solutions about wildfire hazards and ways to address them” was the lowest-performing statement in 2021, with only 38 percent of respondents agreeing. In 2022, employee perceptions notably improved, with 57 percent of respondents agreeing with this statement, of which 34 percent “strongly” agreed. While this statement is still a lower-performing statement in 2022, the increase in agreement may indicate that BVES is moving in the right direction regarding this statement. In 2022, the average score for the statement “I feel comfortable discussing wildfire hazards with my supervisor” improved by 0.50, with 80 percent of respondents agreeing with this statement, of which 65 percent reported strong agreement. In 2021, fewer respondents agreed with the statement, with 75 percent reporting agreement and 58 percent reporting strong agreement.

2.2.2 Improved Employee Engagement

In 2022, the statement “The company cares about my opinions,” in the overall culture category, generated the greatest improvement, gaining 0.63, with 67 percent of respondents indicating agreement with this statement. It is essential to an effective safety culture for an organization’s leadership to take employee opinions seriously.

In BVES’s 2022 safety culture objectives, lessons learned, and progress on 2021 recommendations, BVES indicated several actions that provided employees the opportunity to express their opinions:

- Leadership participated in monthly safety committee meetings to listen to concerns and address safety issues.
- BVES incorporated safety in supervisor and management performance reviews.
- Supervisors held weekly team meetings to discuss and reinforce safety.
- BVES hosted a contest to allow BVES employees to develop its safety logo.
- BVES met weekly with vegetation contractor's field crews to discuss safety issues, share lessons learned, and improve situational awareness.

2.3 Opportunities

BVES has several areas where it can strengthen its safety culture. The following sections describe the areas where BVES should prioritize improving its safety culture, followed by specific recommendations in Section 3.

2.3.1 Safety Culture Gaps

Results from the workforce survey showed notable safety culture gaps, with less positive perceptions held by BVES's contractors and the BVES Design and Construction business unit.

2.3.1.1 Contractor Safety Culture Perceptions

The 2022 workforce survey results indicated that BVES contractors were notably less positive than full-time employees about BVES's safety culture across all three workforce survey categories (wildfire safety, personal safety, and overall culture). Contractor perceptions were also less positive than in 2021. The table below shows contractor scores for workforce survey categories in 2022 and 2021, as well as the difference in score between survey years.

Workforce Survey Categories	Contractor 2022 Average Score	Contractor 2021 Average Score	Difference in score from 2021 to 2022
Wildfire Safety	3.76	3.76	0.00
Personal Safety	3.64	4.35	-0.71
Overall Culture	3.56	3.87	-0.31

The lowest scoring statement for contractors in 2022 was “People have the ability to respond to and correct problems and errors before they get out of control,” a statement from the personal safety category. This statement generated an average score of 3.18 in 2022, down from 4.00 in 2021. The second-lowest scoring item for contractors in 2022 was “My supervisor would use whatever power they have to help me out,” from the overall culture category. This statement also generated a low score of 3.27 in 2022, a decline of 1.18 points from the 2021 score of 4.45.

Additional demographic data captured through the workforce survey showed that contractor respondents with a tenure of a year or less generally reported less-positive perceptions across workforce survey statement categories than other survey respondents with longer tenures. Contractors with tenures of a year or less gave the lowest scores for 24 of the 30 workforce survey statements.

Furthermore, the scores generated by BVES contractors in 2022 were lower than the scores given by contractors at the other two SMJUs overall and in the wildfire safety

and overall culture categories.²⁰

See the corresponding recommendation in Section 3.1 of this report.

2.3.1.2 Design and Construction Business Unit Safety Culture Perceptions

Disparity in safety culture perceptions among business units indicates an imbalance in how safety culture is experienced across BVES. The 2021 SCA report identified disparity in safety culture perceptions among business units in the overall culture category.²¹ This opportunity for safety culture improvement remains in 2022 and extends across workforce survey statement categories (wildfire safety, personal safety, and overall culture). Two business units gave much higher scores to BVES's safety culture than other business units: Vegetation Management and Engineering and Planning.

Design and Construction employees gave the lowest overall average score of 3.57 (out of a possible 5), with similar averages across the wildfire safety, personal safety, and overall culture categories. The lowest-performing statement for Design and Construction, "My supervisor would use whatever power they have to help me out," generated a substantially lower score than other business units, with an average score of 3.00 compared to the next lowest score of 3.91 held by respondents in the business units classified as "other" on the survey (i.e., Customer Care, IT/Project Management, Regulatory, Administrative).

Further, four of the eight top-performing survey statements for BVES were among the lower-scoring half of statements for the Design and Construction business unit. Notably,

²⁰ The average overall score for BVES contractors on the workforce survey was 3.65 out of a possible 5. The average overall score for PacifiCorp contractors was 4.32. The average overall score for Liberty Utilities contractors was 4.34.

²¹ [Bear Valley Electric Service's 2021 Safety Culture Assessment \(Oct. 2021\)](https://energysafety.ca.gov/wp-content/uploads/2021-sca-report-bves.pdf) (https://energysafety.ca.gov/wp-content/uploads/2021-sca-report-bves.pdf, accessed Jan. 27, 2023).

these statements are all from the wildfire safety category. These four relatively low-scoring statements were:

- “I feel comfortable discussing wildfire hazards with my supervisor.” (Overall BVES average: 4.56, Design and Construction average: 3.43.)
- “People look for wildfire hazards and risks as work progresses.” (Overall BVES average: 4.53, Design and Construction average: 3.29.)
- “Wildfire and personal safety concerns are communicated openly.” (Overall BVES average: 4.47, Design and Construction average: 3.29.)
- “Our management acts quickly to address wildfire hazards.” (Overall BVES average: 4.47, Design and Construction average: 3.29.)

These differences indicate that Design and Construction employees have a less positive experience of safety culture in the wildfire mitigation work context than other employees. BVES should involve Design and Construction in the development of strategic actions for safety culture improvement.

See the corresponding recommendation in Section 3.2 of this report.

2.3.2 Near Misses and Hazard Management

Survey respondents gave very high scores to several statements related to wildfire hazard identification. In particular, the following statements in the wildfire safety category received very high scores (4.50 or greater):

- “I feel comfortable discussing wildfire hazards with my supervisor.” (Average score: 4.56)
- “People look for wildfire hazards and risks as work progresses.” (Average score: 4.52)

BVES can build on these strengths to improve the organization’s hazard and near-miss

reporting.

In contrast, the lowest-scoring statement in 2022 was “People report mistakes they make, even if others do not notice them.” Although this statement saw a slight increase in average score from 2021 to 2022, approximately one out of three respondents answered neutrally or disagreed with this statement. Respondents indicating neither agreement nor disagreement with this statement may indicate a lack of awareness of how people are reporting mistakes or how BVES responds to these reports.

Additionally, the survey scores for nine statements declined since 2021. Of these nine statements, five statements related to hazard response, reporting, and management. These statements were:

- “Pausing work for hazards and safety concerns is viewed positively.”
- “Our management acts quickly to address wildfire hazards.”
- “Protecting the community from wildfire hazards is clearly a high priority with management.”
- “Accidents and incidents are investigated completely to find out what happened and the corrective actions needed.”
- “If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor.”

While these statements were still relatively high-performing statements, declines in employee agreement with these statements indicate an opportunity to strengthen BVES’s protocols for response to near misses and hazards, including their reporting and management.

Finally, the statement “I take responsibility for the safety of myself and others in my work area” received the highest score on the survey, demonstrating that employees are watching out for each other. However, “I am regularly asked for my ideas and

suggestions about wildfire hazards and ways to address them” was the second-lowest performing survey statement. There may be an opportunity for BVES to capitalize on employees’ sense of mutual responsibility for safety to improve near-miss and hazard reporting. Furthermore, the development of solutions to problems evident in near-miss and hazard trends will strengthen employee empowerment and ownership of safety operations.

See the corresponding recommendation in Section 3.3 of this report.

2.3.3 Specificity of Leading Indicator Metrics

In its 2022 safety culture objectives, lessons learned, and progress on 2021 recommendations²², BVES identified a 12-month goal to establish, collect, and publish a set of safety metrics, including leading indicators,²³ to evaluate safety. The examples provided were primarily lagging indicators²⁴ like “# of Days Accident and Injury Free (since last [sic] accident/injury-Performance),” “# of Fatalities (YTD-Performance),” and “# of Employee Contact with High Voltage (YTD-Performance).”

See the corresponding recommendation in Section 3.4 of this report.

²² See Section 5.2, 1.1 Objectives for the Next 12 Months, A2. Objective 2.

²³ Leading indicator: here, an input measure that is predictive of a future event. [Safety Culture Assessment Guidelines for Electrical Corporations \(March 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true, accessed Dec. 14, 2022).

²⁴ Lagging indicator: here, an outcome or output measure that is backward-looking, describing a past event. [Safety Culture Assessment Guidelines for Electrical Corporations \(March 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true, accessed Dec. 14, 2022).

3 Recommendations

Culture change takes time, dedication, and starts with understanding where a company is on its organizational safety culture journey and the underlying drivers influencing the workforce. The recommendations in this report are based on observations from BVES's 2022 SCA inputs: safety culture objectives; lessons learned; progress on 2021 recommendations; and the workforce survey. Some of the recommendations included here build on recommendations from the BVES 2021 Safety Culture Assessment report²⁵ while others are newly introduced based on BVES's 2022 assessment.

Recommendations for BVES are outlined below and structured as follows: overall theme of the recommendation; observations from the SCA inputs contributing to the recommendation; goals of the recommendation; and verification method.

3.1 Refine Contractor Strategic Improvement Plan

In collaboration with BVES's contractors, BVES should review and refine its current strategic improvement plan to address gaps in overall safety culture for contractors. This plan should propose ways to improve contractor relationships with BVES supervisors and contractor empowerment to address problems in a timely fashion. This recommendation builds upon a 2021 SCA recommendation.

BVES's 2022 safety culture objectives and lessons learned²⁶ outline the efforts that BVES has made in response to the initial 2021 recommendation regarding contractor safety culture, including high-level leadership discussions, implementation of an action plan to improve information flow, contractor-specific training, and a weekly meeting

²⁵ [Bear Valley Electric Service's 2021 Safety Culture Assessment \(Oct. 2021\)](https://energysafety.ca.gov/wp-content/uploads/2021-sca-report-bves.pdf)

(<https://energysafety.ca.gov/wp-content/uploads/2021-sca-report-bves.pdf>, accessed Jan. 27, 2023).

²⁶ See Section 5.2 "Safety Culture Objectives, Lessons Learned, and 2021 Recommendations Report."

cadence with contractor field crews to discuss safety issues. Despite these efforts, overall contractor responses to the 2022 workforce survey indicate a less-positive view of safety culture than in 2021.²⁷ BVES must work with contractors to understand why they have lowered their opinion about BVES’s safety culture and implement specific measures to address their concerns.

BVES should consider including improvements to its efforts to onboard, train, and otherwise engage contractors in its strategic plan. BVES should consider the role of BVES supervisors in listening to, supporting, and empowering contractors. The BVES improvement plan should include measures like listening sessions to better understand and respond to contractor perceptions, increased presence of leadership at job sites to witness challenges encountered by contractors, and increased training to improve the ability of frontline supervisors to communicate effectively with contractors and ultimately improve the safety culture among contractors.

3.1.1 Observations

BVES contractors gave notably lower scores on the workforce survey, overall and across workforce survey statement categories, compared to full-time employees. In addition, contractors gave lower scores than full-time employees for all 30 survey statements. BVES’s two lowest-scoring workforce survey statements were:

- “People have the ability to respond to and correct problems and errors before they get out of control.” (Contractor average: 3.18, full-time employee average: 4.56)

²⁷ Note, it is unclear if the contractors who participated in the 2022 workforce survey are part of the same vegetation management contract group identified in the 2021 SCA, and recipient of the actions taken outlined by BVES in its safety culture objectives and lessons learned. Based on the headcount BVES provided to NSC, the number of BVES contractors has substantially increased since 2021.

- “My supervisor would use whatever power they have to help me out.” (Contractor average: 3.27, full-time employee average: 4.40)

BVES elicited 11 contractor responses out of a base number of 28 contractors, a 39 percent response rate compared with 92 percent in 2021 (11 contractor responses out of 12).

3.1.2 Goals of Recommendation

The goals of this recommendation are to improve supervisory support and guidance for BVES contractors and increase contractor empowerment to respond to problems in a timely fashion.

3.1.3 Verification Method

BVES’s 2023 progress report on 2022 recommendations must include a description of the plan designed and implemented in collaboration with contractors to address contractor empowerment and supervisory support. BVES must include information about the problems it identified collaboratively with contractors and actions it took to improve safety culture among contractor employees.

Progress will be evident in increased contractor participation on future workforce surveys and increased positivity in response to the two workforce survey statements “People have the ability to respond to and correct problems and errors before they get out of control” and “My supervisor would use whatever power they have to help me out.”

3.2 Address Safety Culture Opportunities for the Design and Construction Business Unit

BVES should develop and implement a strategic improvement plan to address the

workforce survey result indicating that Design and Construction employees have a less positive experience of safety culture in the wildfire mitigation work context than other employees. The survey also indicated that this unit may lack effective supervision. This is a new recommendation in response to the 2022 SCA inputs.

Although BVES's 2022 workforce survey showed improvement over 2021 in the overall score and across the different statement categories, comparisons of results by business unit revealed inconsistencies in the way employees experience safety culture at BVES, especially in the results from the Design and Construction business unit. BVES should undertake measures to improve the safety culture experience of this business unit.

3.2.1 Observation

The workforce survey scores for the Design and Construction business unit were significantly lower than other business units overall and across statement categories. Further, top-performing statements for BVES as a whole did not perform well in the Design and Construction unit's surveys. The lowest-performing statement for Design and Construction (receiving lower scores from this business unit than others) was "My supervisor would use whatever power they have to help me out."

3.2.2 Goal of Recommendation

The goal of this recommendation is to improve the safety culture in the Design and Construction business unit, bringing it into alignment with the safety culture in other BVES business units.

3.2.3 Verification Method

BVES's 2023 progress report on 2022 recommendations must include a description of the strategic actions it takes to improve the Design and Construction business unit's

safety culture. Progress will be evident through improved scores on future workforce surveys for the Design and Construction business unit.

3.3 Strengthen Safety-Enabling Systems

BVES should strengthen its safety-enabling systems by improving protocols for responding to safety events (near misses and hazards), including their reporting and management. This is a new recommendation in response to the 2022 SCA inputs.

BVES should continue to build its “Continuous Improvement Program” described in its 2022 safety culture objectives to improve employee understanding of the importance of submitting safety event reports, including near-miss reports. BVES should strengthen hazard and near-miss response, recognition, and reporting through increased worker involvement, worker training, and formal recognition of workers for reporting near misses and hazards. In particular, BVES should conduct at least one training on near-miss reporting protocols. BVES should identify and address any barriers to reporting within its safety-enabling systems (procedures, software, communication, etc.).

3.3.1 Observations

BVES’s lowest-scoring workforce survey statement in 2022 was “People report mistakes they make, even if others do not notice them.” One out of three respondents answered neutrally or disagreed with this statement (10 percent of respondents disagreed with this statement, 23 percent provided a neutral response).

Average scores for five statements regarding hazard response, reporting, and management declined since 2021. These statements were:

- “Pausing work for hazards and safety concerns is viewed positively.”
- “Our management acts quickly to address wildfire hazards.”

- “Protecting the community from wildfire hazards is clearly a high priority with management.”
- “Accidents and incidents are investigated completely to find out what happened and the corrective actions needed.”
- “If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor.”

3.3.2 Goals of Recommendation

The goal of this recommendation is to improve employee understanding of the importance of submitting safety event reports, including near-miss reports, and remove barriers to reporting at BVES to reduce wildfire risk and promote continuous learning.

3.3.3 Verification Method

BVES’s 2023 progress report on 2022 recommendations must include the number of safety event (near-miss and hazard) reports submitted by employees on a monthly basis and include an assessment of the quality of these reports, any trends identified, and actions taken to improve safety based on the reports. BVES must also report on the date and attendance on the training it conducts on near-miss reporting protocols.

Progress should also be evident in an improved workforce survey score for the statement “People report mistakes they make, even if others do not notice them” on future workforce surveys.

3.4 Increase Leading Indicators in Safety Performance

Metrics

BVES should further develop and implement the use of specific leading indicators to improve safety and health outcomes in connection with its 12-month goal to establish,

collect, and publish a set of safety metrics, including leading indicators, to evaluate safety. This is a new recommendation in response to the 2022 SCA inputs.

Leading indicators can play a vital role in preventing worker fatalities, injuries, and illnesses and strengthening other safety and health outcomes in the workplace. Leading indicators can be used to design proactive, preventive measures. They can shed light on issues with the effectiveness of safety and health activities and reveal potential problems in a safety and health management system. BVES should prioritize tracking leading indicator safety performance metrics and identify specific leading indicators to provide insights into potential interventions.²⁸ Some metrics to include might include the number of employees BVES trains in near-miss reporting, how many and which kinds of remediations it undertakes in response to hazard reports, and the number of employee-led hazard solutions it implements.

3.4.1 Observations

In its 2022 safety culture objectives and lessons learned, BVES identified a 12-month goal to “Establish, collect, and publish to all employees a set of metrics that indicate safety performance as well as provide indication of future safety performance (leading indicators).” The examples provided are primarily lagging indicators.²⁹

3.4.2 Goal of Recommendation

The goal of this recommendation is to encourage BVES to track leading indicators in

²⁸ Leading indicator: here, an input measure that is predictive of a future event. [Safety Culture Assessment Guidelines for Electrical Corporations \(March 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true, accessed Dec. 14, 2022).

²⁹ Lagging indicator: here, an outcome or output measure that is backward-looking, describing a past event. [Safety Culture Assessment Guidelines for Electrical Corporations \(March 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52124&shareable=true, accessed Dec. 14, 2022).

order to focus on prevention versus reaction.

3.4.3 Verification Method

BVES's 2023 progress report on 2022 recommendations must include a description of the specific leading indicators that it selected, how it tracked them, and how it communicates information about any trends in these indicators to its frontline employees.



4 Conclusion

This report provides the findings and recommendations from BVES's second SCA under Public Utilities Code section 8389(d)(4). This report includes a year-over-year assessment of BVES's safety culture based on the results of the first SCA in 2021. Following the publication of this report, BVES 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 BVES. 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 BVES's relative strengths and opportunities in designing and implementing a strong safety culture. As stated above, Energy Safety ultimately seeks to assess safety culture outcomes over time and incorporate continuous learning into the SCA process.



5 Data Attachments

Energy Safety Workforce Survey 2022: Overall Results and 30 Standard Statements

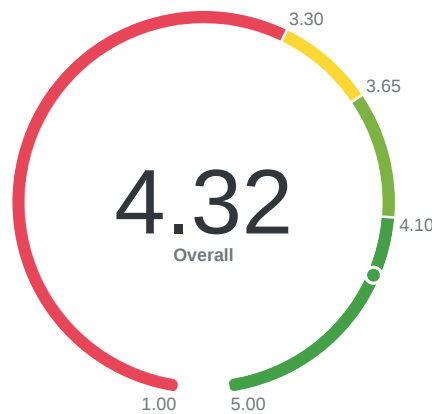
This page contains average response scores and percent distributions of response categories for the overall survey, the three performance categories, and the 30 Energy Safety Workforce Survey standard statements.

Average Response Score Metrics: *Low: < 3.30, Medium: 3.30 - 3.65, Moderately High: 3.65 - 4.10, High: 4.10 +*
Response Categories: *Strongly Disagree = 1, Disagree = 2, Neutral = 3, Agree = 4, Strongly Agree = 5*

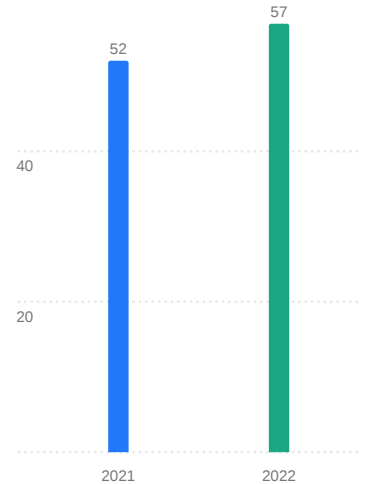
Average Response Scores by Year



Average Response Score 2022



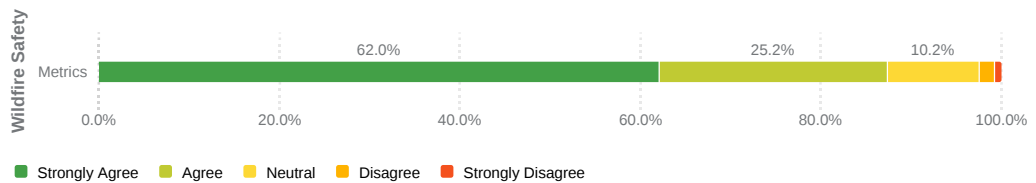
Number of Responses by Year



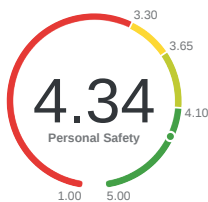
Wildfire Safety 2022



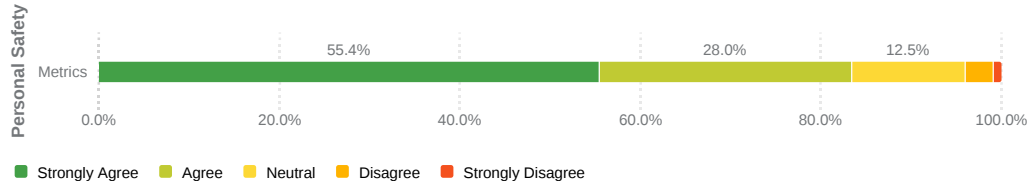
Percent Distributions 2022



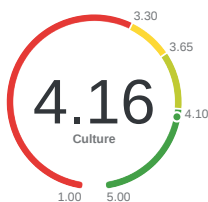
Personal Safety 2022



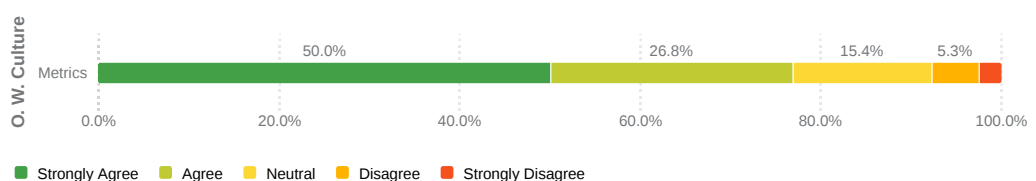
Percent Distributions 2022



Overall Workplace Culture 2022



Percent Distributions 2022



Energy Safety Workforce Survey 2022: Overall Results and 30 Standard Statements

Wildfire Safety

Wildfire Safety Statements	2021	2022	Change ▲	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	3.98	4.60	0.62	60%	23%	8%	6%	3%
I feel comfortable discussing wildfire hazards with my supervisor	4.06	4.56	0.50	65%	15%	9%	9%	2%
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.52	3.95	0.43	34%	23%	31%	5%	6%
Leaders actively seek out signs of potential wildfire hazards	4.33	4.58	0.25	59%	30%	9%	2%	0%
People look for wildfire hazards and risks as work progresses	4.35	4.53	0.18	55%	34%	11%	0%	0%
People in my workgroup report all wildfire hazards, no matter how minor	4.29	4.39	0.10	51%	33%	15%	1%	0%
Wildfire and personal safety concerns are communicated openly	4.42	4.47	0.05	57%	34%	6%	3%	0%
Protecting the community from wildfire hazards is clearly a high priority with management	4.69	4.58	0.11	72%	22%	5%	2%	0%
Our management acts quickly to address wildfire hazards	4.63	4.47	0.16	66%	25%	7%	2%	0%

Average Response Score Metrics: **Low:** < 3.30, **Medium:** 3.30 - 3.65, **Moderately High:** 3.65 - 4.10, **High:** 4.10 +

Personal Safety

Personal Safety Statements	2021	2022	Change ▲	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
People focus on one task at a time and avoid distractions	3.56	4.02	0.46	34%	31%	20%	10%	5%
People have the skills they need to resolve workplace safety issues	4.23	4.44	0.21	50%	38%	9%	1%	2%
People have the ability to respond to and correct problems and errors before they get out of control	4.13	4.30	0.16	41%	44%	11%	3%	1%
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.15	4.30	0.14	50%	29%	17%	2%	2%
We have the right tools for the job	4.04	4.09	0.05	47%	28%	14%	6%	5%
Leaders use mistakes and incidents as learning opportunities	4.33	4.33	0.01	53%	30%	13%	4%	0%
Leaders keep people prepared to intervene when an emergency occurs	4.44	4.39	0.06	57%	29%	12%	2%	0%
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.50	4.44	0.06	60%	30%	8%	1%	1%
I take responsibility for the safety of myself and others in my work area	4.71	4.65	0.06	74%	19%	6%	0%	0%
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.38	4.30	0.09	55%	30%	9%	5%	1%
Pausing work for hazards and safety concerns is viewed positively	4.65	4.46	0.20	69%	21%	6%	4%	0%

Average Response Score Metrics: **Low:** < 3.30, **Medium:** 3.30 - 3.65, **Moderately High:** 3.65 - 4.10, **High:** 4.10 +

Overall Workplace Culture

Overall Workplace Culture Statements	2021	2022	Change ▲	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
The company cares about my opinions	3.58	4.21	0.63	43%	24%	18%	10%	5%
Information about important events and lessons learned is shared within my workgroup	3.79	4.23	0.44	48%	25%	13%	11%	4%
People listen to one another: it is rare that someone's views go unheard	3.96	4.19	0.23	45%	30%	15%	8%	2%
My supervisor makes sure all employee concerns are heard before job decisions are made	4.00	4.14	0.14	44%	32%	15%	6%	4%
I believe managers apply the same rules for all workers	3.87	4.00	0.13	44%	30%	10%	10%	6%
People report mistakes they make, even if others do not notice them	3.77	3.89	0.12	30%	36%	23%	7%	3%
Managers treat workers with respect	4.19	4.23	0.04	50%	31%	9%	8%	1%
People in my workgroup treat each other with respect	4.33	4.35	0.02	52%	35%	10%	0%	3%
Leaders encourage people to ask questions	4.27	4.21	0.05	53%	27%	14%	5%	2%
My supervisor would use whatever power they have to help me out	4.33	4.18	0.15	53%	30%	9%	6%	2%

Average Response Score Metrics: **Low:** < 3.30, **Medium:** 3.30 - 3.65, **Moderately High:** 3.65 - 4.10, **High:** 4.10 +

Demographic Comparisons

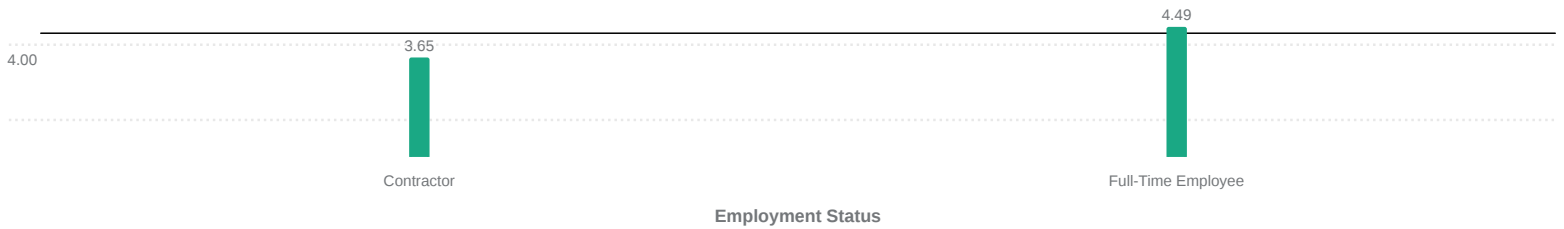
Survey respondents were asked to provide demographic information at the conclusion of the **Energy Safety Workforce Survey**. These responses were used to conduct analyses and provide these subgroup comparisons.

In order to protect respondent anonymity and to avoid making inaccurate generalizations based on an inadequate sample size, comparisons were not computed for groups with fewer than five respondents.

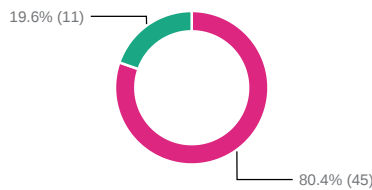
Average Response Score Metrics: **Low**: < 3.30, **Medium**: 3.30 - 3.65, **Moderately High**: 3.65 - 4.10, **High**: 4.10 +
Response Categories: **Strongly Disagree** = 1, **Disagree** = 2, **Neutral** = 3, **Agree** = 4, **Strongly Agree** = 5

1. Comparison by Employment Status

Overall Average Response Score

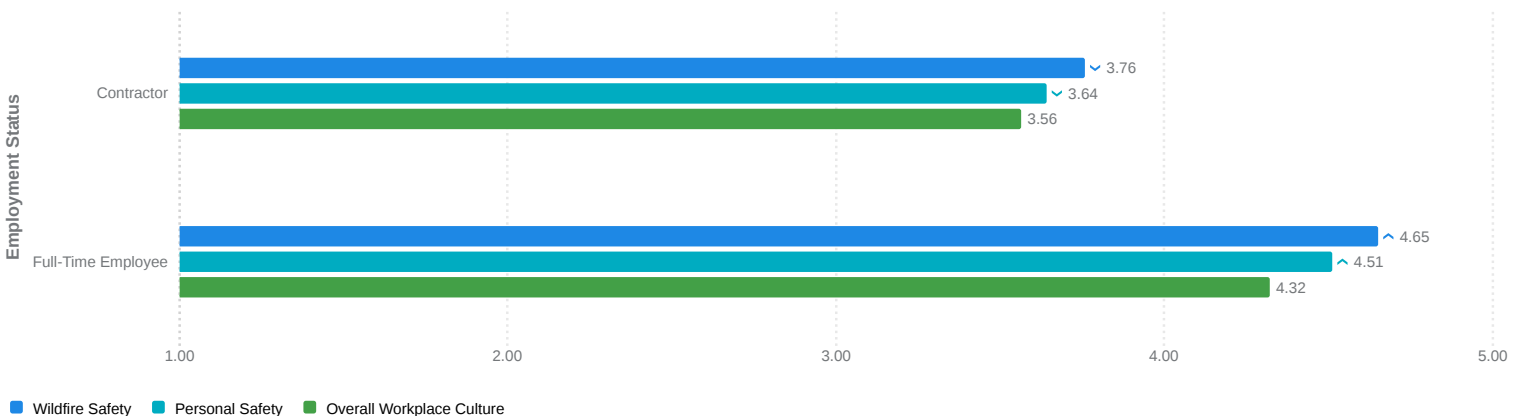


Number of Responses 56



Full-Time Employee Contractor

Average Response Scores by Statement Category



Average Response Scores by Statement

Wildfire Safety	Contractor	Full-Time Employee
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.82	3.95
I feel comfortable discussing wildfire hazards with my supervisor	3.64	4.80
Leaders actively seek out signs of potential wildfire hazards	4.09	4.71
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.00	4.78
Our management acts quickly to address wildfire hazards	3.64	4.71
People in my workgroup report all wildfire hazards, no matter how minor	3.55	4.64
People look for wildfire hazards and risks as work progresses	3.73	4.73
Protecting the community from wildfire hazards is clearly a high priority with management	3.64	4.82
Wildfire and personal safety concerns are communicated openly	3.73	4.69

Average Response Score Metrics: **Low:** < 3.30, **Medium:** 3.30 - 3.65, **Moderately High:** 3.65 - 4.10, **High:** 4.10 +

Average Response Scores by Statement

Personal Safety	Contractor	Full-Time Employee
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	3.64	4.47
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	3.73	4.44
I take responsibility for the safety of myself and others in my work area	3.73	4.87
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	3.82	4.60
Leaders keep people prepared to intervene when an emergency occurs	3.64	4.56
Leaders use mistakes and incidents as learning opportunities	3.64	4.49
Pausing work for hazards and safety concerns is viewed positively	3.73	4.67
People focus on one task at a time and avoid distractions	3.50	4.16
People have the ability to respond to and correct problems and errors before they get out of control	3.18	4.56
People have the skills they need to resolve workplace safety issues	3.82	4.62
We have the right tools for the job	3.64	4.20

Average Response Score Metrics: **Low:** < 3.30, **Medium:** 3.30 - 3.65, **Moderately High:** 3.65 - 4.10, **High:** 4.10 +

Average Response Scores by Statement

Overall Workplace Culture	Contractor	Full-Time Employee
I believe managers apply the same rules for all workers	3.64	4.09
Information about important events and lessons learned is shared within my workgroup	3.82	4.36
Leaders encourage people to ask questions	3.55	4.39
Managers treat workers with respect	3.64	4.38
My supervisor makes sure all employee concerns are heard before job decisions are made	3.55	4.29
My supervisor would use whatever power they have to help me out	3.27	4.40
People in my workgroup treat each other with respect	3.64	4.53
People listen to one another: it is rare that someone's views go unheard	3.36	4.40
People report mistakes they make, even if others do not notice them	3.45	4.00
The company cares about my opinions	3.73	4.36

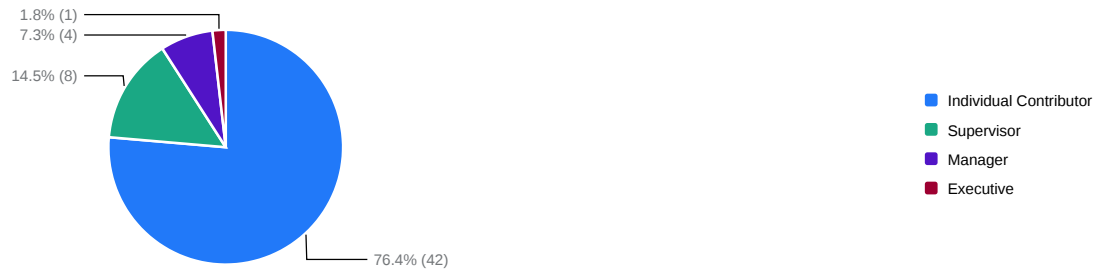
Average Response Score Metrics: **Low:** < 3.30, **Medium:** 3.30 - 3.65, **Moderately High:** 3.65 - 4.10, **High:** 4.10 +

2. Comparison by Position

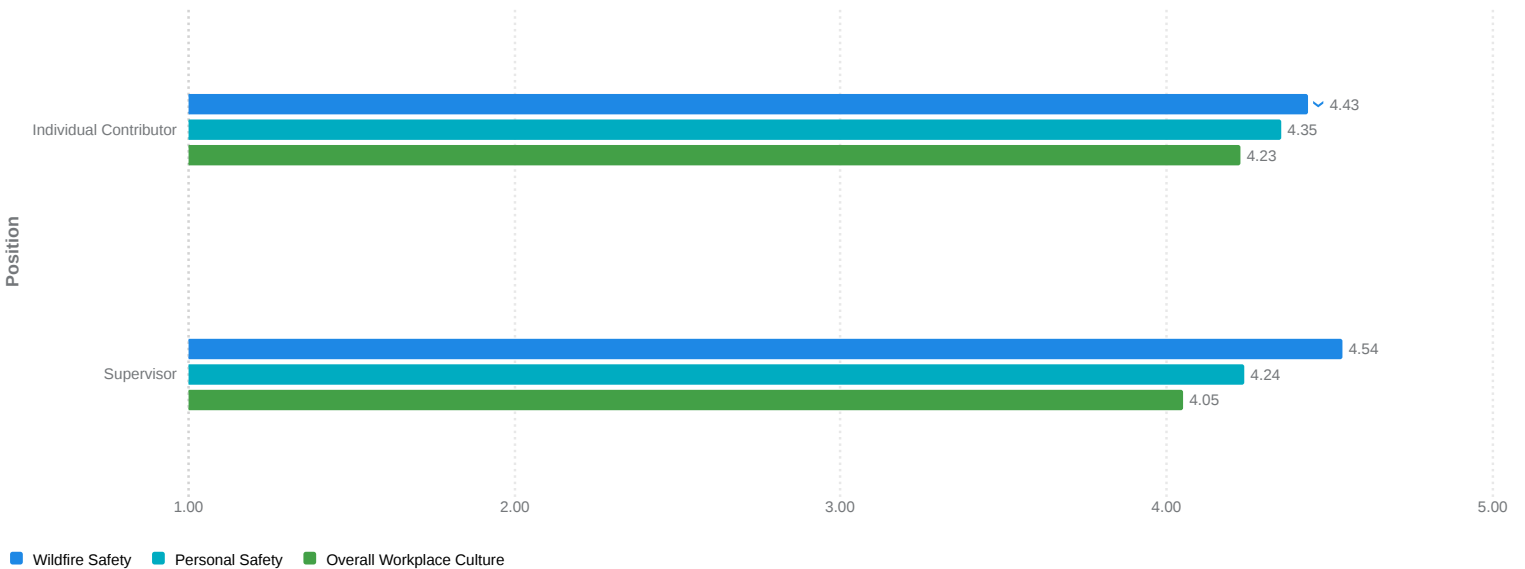
Overall Average Response Score



Number of Responses 55



Average Response Scores by Statement Category



Average Response Scores by Statement

Wildfire Safety	Individual Contributor	Supervisor
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	4.02	3.63
I feel comfortable discussing wildfire hazards with my supervisor	4.55	4.75
Leaders actively seek out signs of potential wildfire hazards	4.57	4.50
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.57	4.75
Our management acts quickly to address wildfire hazards	4.40	4.63
People in my workgroup report all wildfire hazards, no matter how minor	4.38	4.38
People look for wildfire hazards and risks as work progresses	4.48	4.63
Protecting the community from wildfire hazards is clearly a high priority with management	4.52	4.75
Wildfire and personal safety concerns are communicated openly	4.38	4.88

Average Response Score Metrics: **Low:** < 3.30, **Medium:** 3.30 - 3.65, **Moderately High:** 3.65 - 4.10, **High:** 4.10 +

Average Response Scores by Statement

Personal Safety	Individual Contributor	Supervisor
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.33	4.00
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.26	4.38
I take responsibility for the safety of myself and others in my work area	4.60	4.88
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.43	4.63
Leaders keep people prepared to intervene when an emergency occurs	4.38	4.25
Leaders use mistakes and incidents as learning opportunities	4.36	4.38
Pausing work for hazards and safety concerns is viewed positively	4.48	4.38
People focus on one task at a time and avoid distractions	4.17	3.50
People have the ability to respond to and correct problems and errors before they get out of control	4.29	4.38
People have the skills they need to resolve workplace safety issues	4.40	4.50
We have the right tools for the job	4.19	3.38

Average Response Score Metrics: **Low:** < 3.30, **Medium:** 3.30 - 3.65, **Moderately High:** 3.65 - 4.10, **High:** 4.10 +

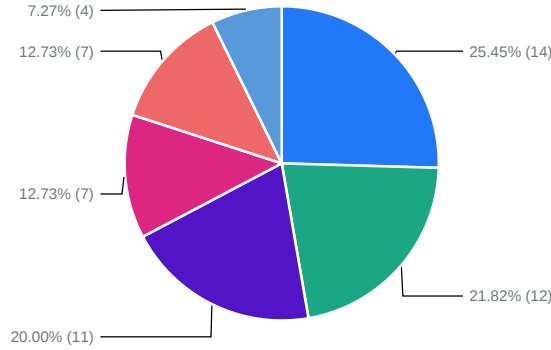
Average Response Scores by Statement

Overall Workplace Culture	Individual Contributor	Supervisor
I believe managers apply the same rules for all workers	4.07	3.88
Information about important events and lessons learned is shared within my workgroup	4.29	4.13
Leaders encourage people to ask questions	4.29	4.00
Managers treat workers with respect	4.24	4.38
My supervisor makes sure all employee concerns are heard before job decisions are made	4.24	3.88
My supervisor would use whatever power they have to help me out	4.17	4.25
People in my workgroup treat each other with respect	4.36	4.50
People listen to one another: it is rare that someone's views go unheard	4.24	4.13
People report mistakes they make, even if others do not notice them	4.05	3.38
The company cares about my opinions	4.31	4.00

Average Response Score Metrics: **Low:** < 3.30, **Medium:** 3.30 - 3.65, **Moderately High:** 3.65 - 4.10, **High:** 4.10 +

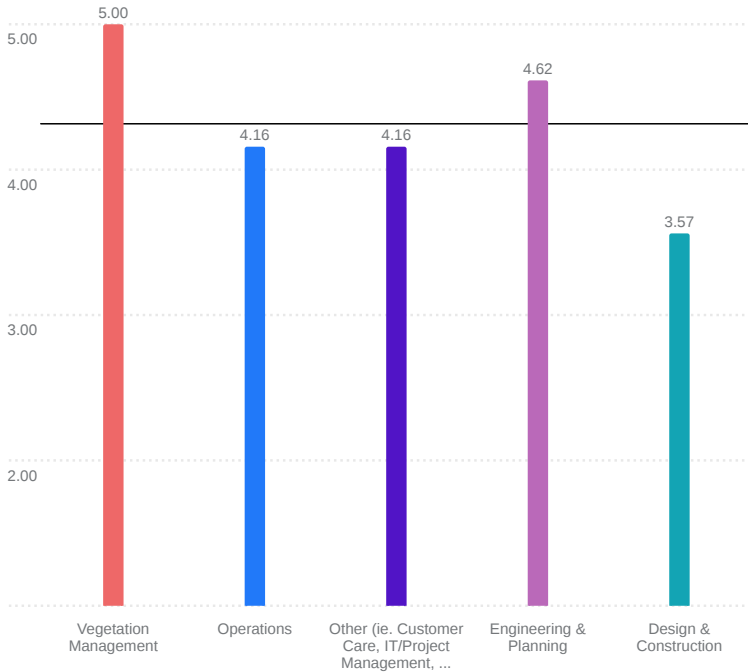
3. Comparison by Business Unit

Number of Responses 55

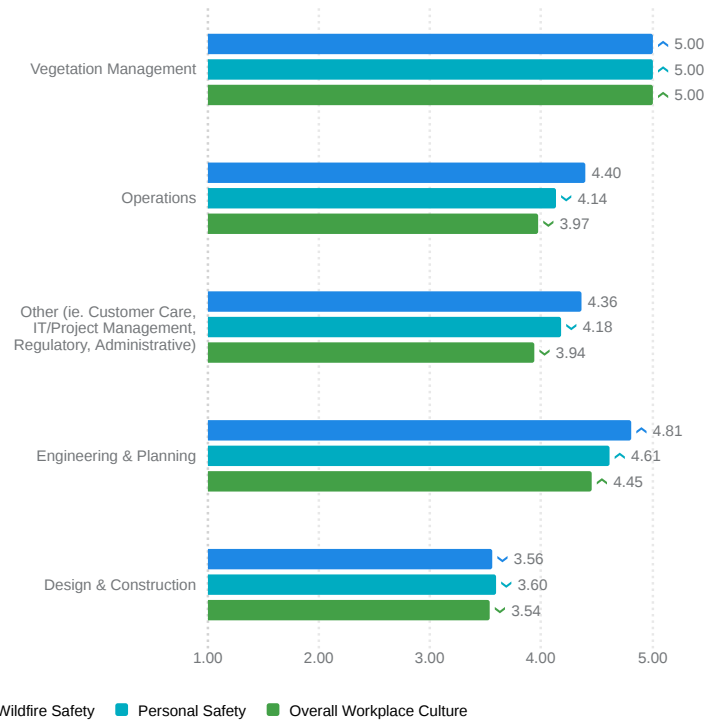


Operations Vegetation Management Other (ie. Customer Care, IT/Project Management, Regulatory, Administrative) Engineering & Planning Design & Construction Accounting

Overall Average Response Score



Average Response Scores by Statement Category



Average Response Scores by Statement

Wildfire Safety	Design & Construction	Engineering & Planning	Operations	Other (ie. Customer Care, IT/Project Management, Regulatory, Administrative)	Vegetation Management
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	4.14	4.67	3.36	3.55	5.00
I feel comfortable discussing wildfire hazards with my supervisor	3.43	4.86	4.57	4.64	5.00
Leaders actively seek out signs of potential wildfire hazards	4.14	4.86	4.43	4.36	5.00
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	3.71	4.71	4.57	4.73	5.00
Our management acts quickly to address wildfire hazards	3.29	4.71	4.50	4.36	5.00
People in my workgroup report all wildfire hazards, no matter how minor	3.14	4.71	4.36	4.36	5.00
People look for wildfire hazards and risks as work progresses	3.29	4.86	4.57	4.55	5.00
Protecting the community from wildfire hazards is clearly a high priority with management	3.57	5.00	4.57	4.36	5.00
Wildfire and personal safety concerns are communicated openly	3.29	4.86	4.64	4.36	5.00

Average Response Score Metrics: **Low:** < 3.30, **Medium:** 3.30 - 3.65, **Moderately High:** 3.65 - 4.10, **High:** 4.10 +

Average Response Scores by Statement

Personal Safety	Design & Construction	Engineering & Planning	Operations	Other (ie. Customer Care, IT/Project Management, Regulatory, Administrative)	Vegetation Management
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	3.14	4.57	4.07	4.36	5.00
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	3.57	4.71	4.14	4.00	5.00
I take responsibility for the safety of myself and others in my work area	3.57	5.00	4.71	4.55	5.00
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	3.86	4.71	4.36	4.09	5.00
Leaders keep people prepared to intervene when an emergency occurs	3.71	4.57	4.14	4.27	5.00
Leaders use mistakes and incidents as learning opportunities	3.86	4.43	4.14	4.18	5.00
Pausing work for hazards and safety concerns is viewed positively	3.71	4.86	4.21	4.36	5.00
People focus on one task at a time and avoid distractions	3.43	3.71	3.85	3.91	5.00
People have the ability to respond to and correct problems and errors before they get out of control	3.29	4.71	4.14	4.18	5.00
People have the skills they need to resolve workplace safety issues	3.71	4.86	4.43	4.09	5.00
We have the right tools for the job	3.71	4.57	3.29	4.00	5.00

Average Response Score Metrics: **Low:** < 3.30, **Medium:** 3.30 - 3.65, **Moderately High:** 3.65 - 4.10, **High:** 4.10 +

Average Response Scores by Statement

Overall Workplace Culture	Design & Construction	Engineering & Planning	Operations	Other (ie. Customer Care, IT/Project Management, Regulatory, Administrative)	Vegetation Management
I believe managers apply the same rules for all workers	3.86	4.43	3.77	3.64	5.00
Information about important events and lessons learned is shared within my workgroup	3.71	4.43	4.00	4.18	5.00
Leaders encourage people to ask questions	3.57	4.71	3.86	4.00	5.00
Managers treat workers with respect	3.50	4.57	4.21	3.82	5.00
My supervisor makes sure all employee concerns are heard before job decisions are made	3.43	4.29	3.86	4.00	5.00
My supervisor would use whatever power they have to help me out	3.00	4.43	4.00	3.91	5.00
People in my workgroup treat each other with respect	3.57	4.57	4.36	4.09	5.00
People listen to one another: it is rare that someone's views go unheard	3.29	4.43	4.14	4.00	5.00
People report mistakes they make, even if others do not notice them	3.67	4.33	3.50	3.36	5.00
The company cares about my opinions	3.71	4.29	4.00	4.36	5.00

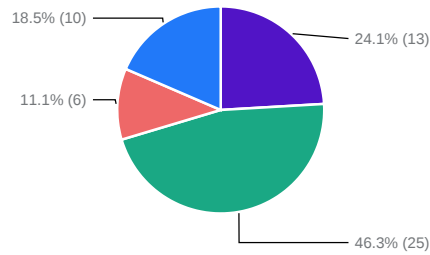
Average Response Score Metrics: **Low:** < 3.30, **Medium:** 3.30 - 3.65, **Moderately High:** 3.65 - 4.10, **High:** 4.10 +

4. Comparison by Tenure

Overall Average Response Score

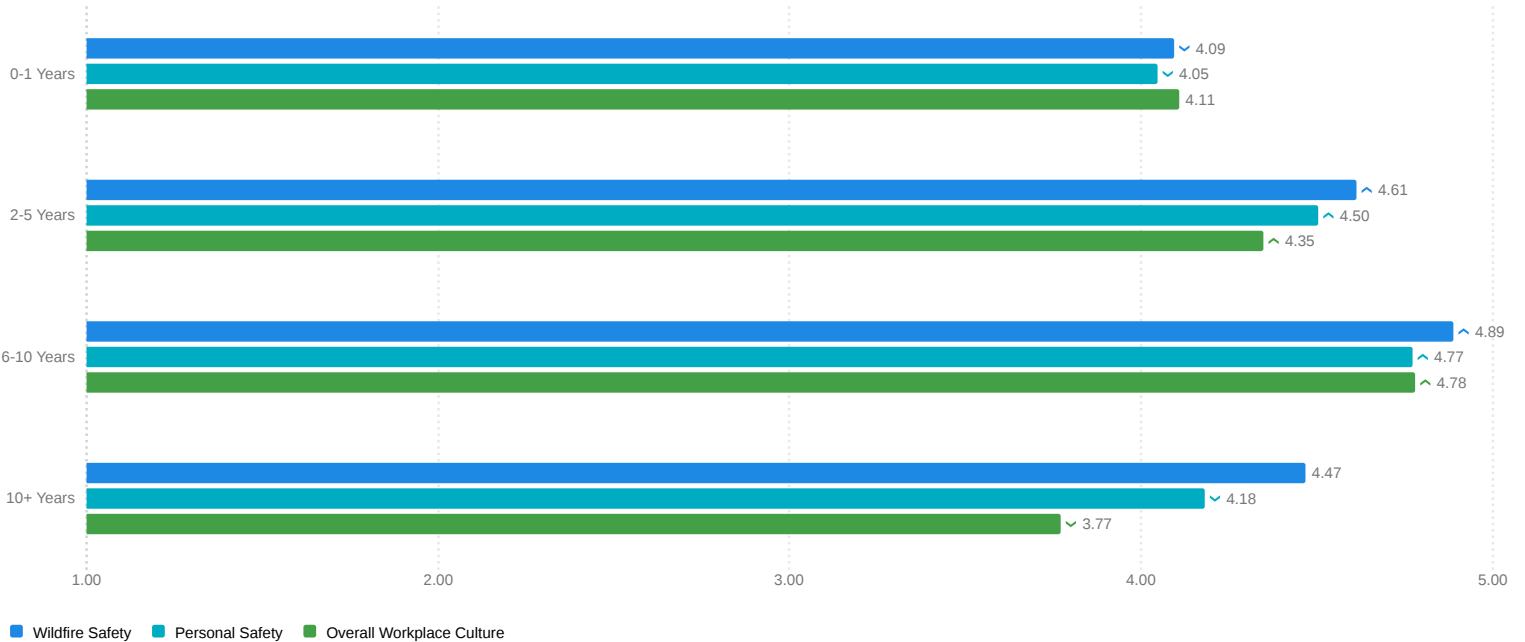


Number of Responses 54



0-1 Years 2-5 Years 6-10 Years 10+ Years

Average Response Scores by Statement Category



Wildfire Safety	0-1 Years	2-5 Years	6-10 Years	10+ Years
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.96	3.88	3.77	3.64
I feel comfortable discussing wildfire hazards with my supervisor	4.71	4.69	4.63	4.60
Leaders actively seek out signs of potential wildfire hazards	4.51	4.44	4.32	4.27
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.66	4.62	4.55	4.52
Our management acts quickly to address wildfire hazards	4.58	4.50	4.41	4.36
People in my workgroup report all wildfire hazards, no matter how minor	4.52	4.48	4.41	4.35
People look for wildfire hazards and risks as work progresses	4.55	4.51	4.43	4.39
Protecting the community from wildfire hazards is clearly a high priority with management	4.71	4.67	4.60	4.59
Wildfire and personal safety concerns are communicated openly	4.68	4.64	4.59	4.54

Average Response Score Metrics: Low: < 3.30, Medium: 3.30 - 3.65, Moderately High: 3.65 - 4.10, High: 4.10 +

Personal Safety	0-1 Years	2-5 Years	6-10 Years	10+ Years
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.50	4.46	4.34	4.29
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.43	4.41	4.37	4.38
I take responsibility for the safety of myself and others in my work area	4.76	4.74	4.70	4.70
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.61	4.57	4.55	4.50
Leaders use mistakes and incidents as learning opportunities	4.43	4.36	4.24	4.18
Leaders keep people prepared to intervene when an emergency occurs	4.49	4.41	4.29	4.20
Pausing work for hazards and safety concerns is viewed positively	4.60	4.55	4.51	4.48
People focus on one task at a time and avoid distractions	4.05	3.93	3.79	3.74
People have the ability to respond to and correct problems and errors before they get out of control	4.44	4.36	4.25	4.21
People have the skills they need to resolve workplace safety issues	4.38	4.32	4.23	4.15
We have the right tools for the job	4.32	4.24	4.10	4.06

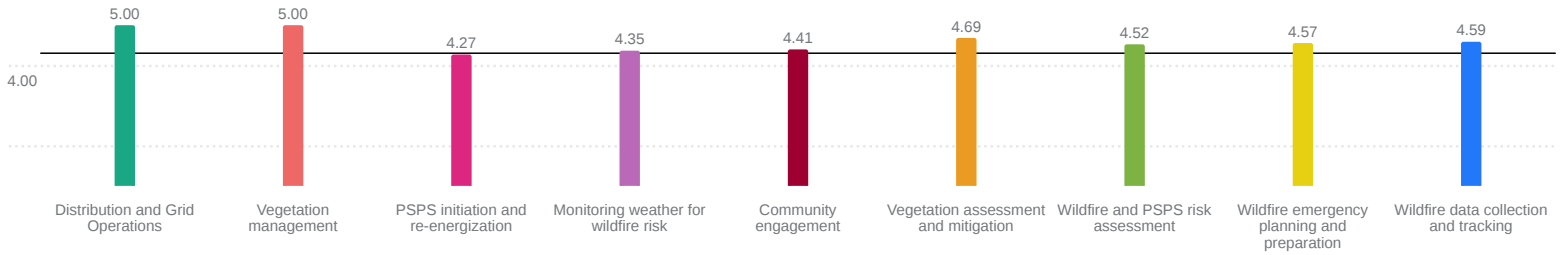
Average Response Score Metrics: Low: < 3.30, Medium: 3.30 - 3.65, Moderately High: 3.65 - 4.10, High: 4.10 +

Overall Workplace Culture	0-1 Years	2-5 Years	6-10 Years	10+ Years
I believe managers apply the same rules for all workers	4.26	4.14	4.00	3.87
Information about important events and lessons learned is shared within my workgroup	4.52	4.45	4.35	4.29
Leaders encourage people to ask questions	4.55	4.45	4.39	4.30
Managers treat workers with respect	4.49	4.38	4.29	4.22
My supervisor makes sure all employee concerns are heard before job decisions are made	4.38	4.30	4.23	4.17
My supervisor would use whatever power they have to help me out	4.54	4.46	4.40	4.36
People in my workgroup treat each other with respect	4.52	4.41	4.38	4.28
People listen to one another: it is rare that someone's views go unheard	4.31	4.20	4.11	4.05
People report mistakes they make, even if others do not notice them	4.12	4.02	3.90	3.81
The company cares about my opinions	4.09	3.94	3.76	3.69

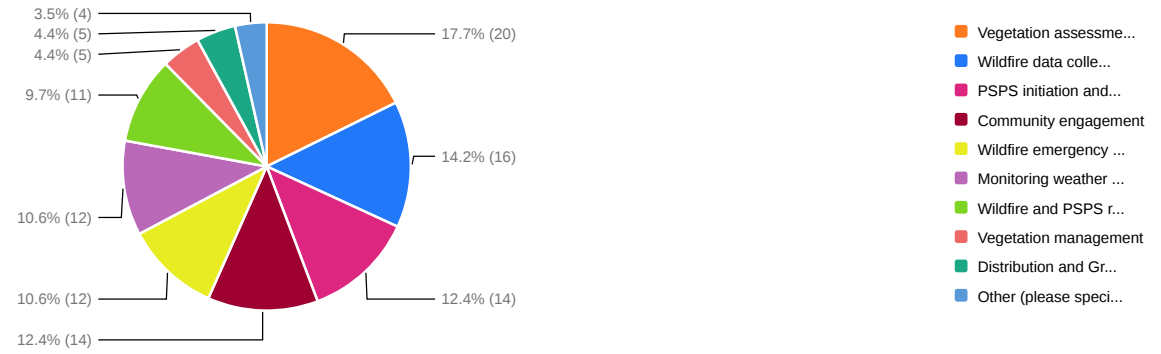
Average Response Score Metrics: Low: < 3.30, Medium: 3.30 - 3.65, Moderately High: 3.65 - 4.10, High: 4.10 +

6. Comparison by Wildfire Activities

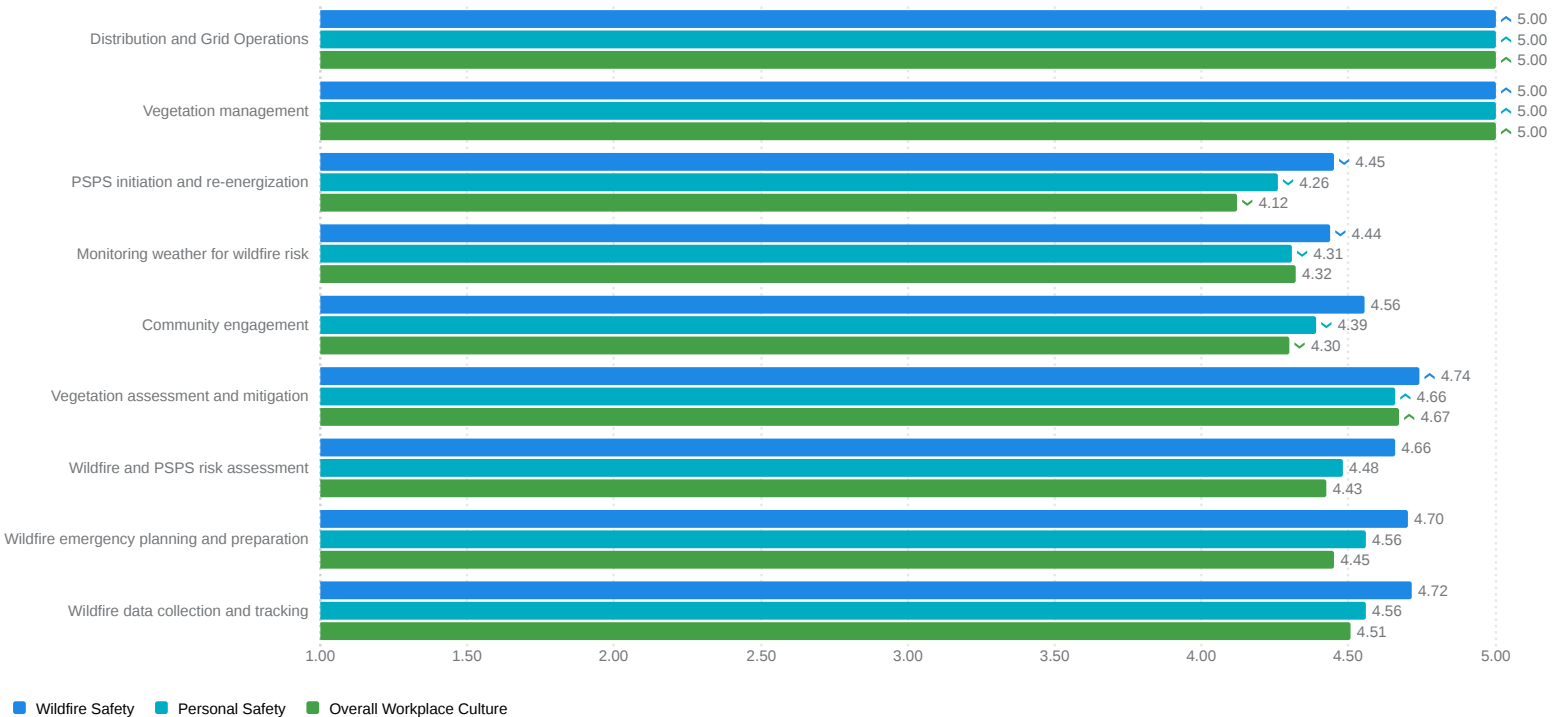
Overall Average Response Score 42



Number of Responses 42



Average Response Scores by Statement Category



Average Response Scores by Statement

Wildfire Safety	Community engagement	Monitoring weather for wildfire risk	Other (please specify):	PSPS initiation and re-energization	Vegetation assessment and mitigation	Wildfire and PSPS risk assessment	Wildfire data collection and tracking	Wildfire emergency planning and preparation
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.83	3.75	2.83	3.92	3.65	3.80	4.18	3.76
I feel comfortable discussing wildfire hazards with my supervisor	4.67	4.71	4.14	4.67	4.44	4.73	4.83	4.67
Leaders actively seek out signs of potential wildfire hazards	4.50	4.41	3.43	4.58	4.22	4.53	4.72	4.29
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.50	4.59	3.43	4.50	4.39	4.53	4.82	4.43
Our management acts quickly to address wildfire hazards	4.50	4.41	3.83	4.33	4.33	4.53	4.82	4.52
People in my workgroup report all wildfire hazards, no matter how minor	4.17	4.24	3.43	4.17	4.17	4.20	4.56	4.14
People look for wildfire hazards and risks as work progresses	4.50	4.35	3.86	4.50	4.28	4.40	4.61	4.43
Protecting the community from wildfire hazards is clearly a high priority with management	4.67	4.65	4.29	4.58	4.56	4.73	4.83	4.71
Wildfire and personal safety concerns are communicated openly	4.67	4.53	3.57	4.58	4.39	4.53	4.56	4.48

Average Response Score Metrics: **Low:** < 3.30, **Medium:** 3.30 - 3.65, **Moderately High:** 3.65 - 4.10, **High:** 4.10 +

Average Response Scores by Statement

Personal Safety	Community engagement	Monitoring weather for wildfire risk	Other (please specify):	PSPS initiation and re-energization	Vegetation assessment and mitigation	Wildfire and PSPS risk assessment	Wildfire data collection and tracking	Wildfire emergency planning and preparation
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.50	4.29	3.83	4.42	4.17	4.33	4.71	4.29
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.00	4.18	4.00	4.25	4.11	4.33	4.67	4.10
I take responsibility for the safety of myself and others in my work area	4.67	4.71	4.29	4.58	4.50	4.60	4.83	4.62
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.50	4.65	3.86	4.67	4.33	4.67	4.83	4.57
Leaders keep people prepared to intervene when an emergency occurs	4.00	4.12	3.33	4.17	4.00	4.00	4.41	4.05
Leaders use mistakes and incidents as learning opportunities	4.50	4.47	3.71	4.42	4.33	4.47	4.67	4.48
Pausing work for hazards and safety concerns is viewed positively	4.50	4.59	3.71	4.67	4.28	4.60	4.78	4.52
People focus on one task at a time and avoid distractions	3.83	3.76	3.17	4.00	3.56	4.00	4.12	3.86
People have the ability to respond to and correct problems and errors before they get out of control	4.00	4.29	3.67	4.25	4.22	4.33	4.53	4.29
People have the skills they need to resolve workplace safety issues	4.50	4.47	3.83	4.50	4.22	4.47	4.59	4.38
We have the right tools for the job	3.83	4.12	3.17	4.17	3.94	4.07	4.18	4.05

Average Response Score Metrics: **Low:** < 3.30, **Medium:** 3.30 - 3.65, **Moderately High:** 3.65 - 4.10, **High:** 4.10 +

Average Response Scores by Statement

Overall Workplace Culture	Community engagement	Monitoring weather for wildfire risk	Other (please specify):	PSPS initiation and re-energization	Vegetation assessment and mitigation	Wildfire and PSPS risk assessment	Wildfire data collection and tracking	Wildfire emergency planning and preparation
I believe managers apply the same rules for all workers	4.33	4.24	3.00	4.33	4.11	4.33	4.39	4.19
Information about important events and lessons learned is shared within my workgroup	4.33	4.35	3.43	4.58	4.06	4.53	4.61	4.38
Leaders encourage people to ask questions	4.50	4.47	3.71	4.50	4.22	4.47	4.56	4.43
Managers treat workers with respect	4.50	4.59	3.71	4.58	4.28	4.53	4.72	4.52
My supervisor makes sure all employee concerns are heard before job decisions are made	4.33	4.35	3.86	4.33	4.22	4.33	4.44	4.33
My supervisor would use whatever power they have to help me out	4.50	4.71	3.83	4.67	4.39	4.73	4.82	4.62
People in my workgroup treat each other with respect	4.67	4.65	3.86	4.58	4.22	4.60	4.72	4.52
People listen to one another: it is rare that someone's views go unheard	4.17	4.24	3.71	4.25	4.00	4.33	4.44	4.19
People report mistakes they make, even if others do not notice them	4.33	3.65	3.17	4.00	3.67	3.93	4.00	3.86
The company cares about my opinions	3.83	4.18	3.17	4.00	4.17	4.13	4.29	4.14

Average Response Score Metrics: **Low:** < 3.30, **Medium:** 3.30 - 3.65, **Moderately High:** 3.65 - 4.10, **High:** 4.10 +



OFFICE OF ENERGY
INFRASTRUCTURE
SAFETY



Safety Culture Objectives and Lessons Learned Report

August 2022

Bear Valley Electric Service, Inc.



Section 1. Safety Culture Objectives, Lessons Learned, and 2021 Recommendations

The texts below, other than the headings, are as they were received from the electrical corporation, presented without revision.

1.1 Objectives for the Next 12 Months

A1. Objective 1

Safety Training Program: A key part of the Company's safety culture is frequent training opportunities.

Objective Statement: Develop a training plan to provide high quality safety training that meets or exceeds minimum safety training requirements and is delivered in a manner to enhance employee learning.

B1. Progress Metrics (if applicable)

Attainment of this objective is measured by: • A written training plan developed with monthly (minimum) training and approved by management.

- Greater than 90% of training listed on the plan is actually conducted and documented.
- Employee training attendance at training plan sessions is greater than 95%.
- Employee required safety training (based on position) has a completion rate of greater than 95% as measured by the Learning Management System (LMS).
- Greater than 85% of employees feel that safety training is of high quality and effective in meeting their ongoing learning needs as measured on employee survey.
- Greater than 85% of employees feel that safety training is an essential part of their work and not a burden to participate in as measured on employee survey.

C1. 12-Month Target

The Company has a purposeful, comprehensive, formal, and documented safety training program that provides:

- All required safety training to employees based on their roles and responsibilities.
- Other safety training that will be valuable to employees in improving their safety in workplace, public safety, and reducing the likelihood of wildfires.

Lessons learned are a key part of periodic training.

Impromptu training is utilized to provide employees with timely lessons learned, emergent or changing conditions, and/or urgent warnings that have been issued.

D1. Description of Objective

A highly effective and purposeful Safety Training Program will reduce wildfire risk to the public and risk to employees conducting wildfire mitigation work because it provides a mechanism for the Company to ensure employees are properly trained to perform their roles and responsibilities in a safe and professional manner. It also ensures employees are trained to recognize unsafe conditions and how to properly take action to remedy the unsafe conditions. Additionally, an effective safety training program ensures that lessons learned from accidents, incidents, near misses, or other industry sources are shared with employees so that these issues do not occur or reoccur.

A2. Objective 2

Establish Metrics Including Leading Indicators: Instead of relying on incidents as the only metric for safety, the Company should develop and use leading indicators to measure success and/or failure.

Objective Statement: Establish, collect, and publish to all employees a set of metrics that indicate safety performance as well as provide indication of future safety performance (leading indicators)

B2. Progress Metrics (if applicable)

Attainment of this objective is measured by:

- The Safety Committee approved a set of safety performance metrics and safety metrics indicative of future safety performance (leading indicators). This metric is measured as achieved by the Safety Committee approving the list of monthly safety metrics.

- A set of Safety Committee approved safety metrics are collected and published to all employees each month. The monthly safety metrics report will document achieving this metric.
- Greater than 85% of employees feel that safety metrics are shared with them by management as indicated s measured on employee survey.
- Greater than 85% of employees feel that leading indicators are meaningful and relevant to their work and provide an accurate depiction of the Company's safety program as indicated s measured on employee survey.
- Greater than 85% of employees feel that management takes action based on the leading indicators when appropriate as indicated s measured on employee survey.

C2. 12-Month Target

The Company has a set of regularly reported safety performance metrics that include leading indicators that are provided to management, the Safety Committee, and all employees. The collection and reporting of the leading indicators is institutionalized in the Company with designated staff responsible for ensure data for leading indicators are collected, analyzed, and reported. Management and the Safety Committee use the leading indicators to make decisions. The metrics are: # of Days Accident and Injury Free (since lass accident/injury-Performance) # of Fatalities (YTD-Performance), # of Employee Contact with High Voltage (YTD-Performance), # of Ignitions (YTD-Performance), # of Motor Vehicle Accidents (YTD-Performance), # of Near Misses (YTD-Leading), # of Live Wire Down Events (YTD-Leading), # of Vegetation Contact with Bare Conductor (YTD-Leading), Wildfire Near Miss Events (YTD-Leading), SAIDI (YTD-Leading), Percent of 4 kV System that is Bare Wire (Leading), and Percent of 34 kV System that is Bare Wire (Leading)

The selected leading indicators are relevant to the Company's safety program including public safety and wildfire mitigation and worker safety.

D2. Description of Objective

Relevant and Institutionalized safety performance metrics (including leading indicators) will reduce wildfire risk to the public and improve workplace safety of employees conducting wildfire mitigation work because it provides management and the Safety Committee clear visibility on the effectiveness of the Company's Safety Program and telltale warning of safety issues that might be developing. Additionally, employees are able to see the results of their safety related efforts and, if adjustments need to be made. Leading indicators are a key element of any continuous improvement program which will support wildfire risk reduction and improved worker safety for employees performing wildfire mitigation work.

A3. Objective 3

Implement Continuous Improvement Program: Company staff should never stop learning, growing, and improving. These efforts mostly seek "incremental" improvement over time through a set of activities designed to bring gradual, ongoing improvement to the safety program through constant review, measurement, and action. These actions can occasionally result in "breakthrough" improvement all at once. Effective continuous improvement programs have a standard process that the company utilizes to identify areas for improvement, creates a plan of action for improvement, executes the plan, evaluates the effectiveness of the action taken, and determines if further adjustments are necessary.

Objective Statement: Implement a highly effective continuous improvement program that aims to improve public and worker safety.

B3. Progress Metrics (if applicable)

Attainment of this objective is measured by:

1. Safety Committee minutes regularly document the following:
 - o That it is evident that the Safety Committee uses the program to implement improvements where it deems necessary through safety audit findings; root cause analysis on accidents, incidents, and near misses; management observations, employee referrals, etc.
 - o Areas for improvement are identified and plans of action are developed for the selected improvement areas. Courses of action are implemented with follow through and accountability.
 - o Results of actions are evaluated using metrics and other objective observation methods. Adjustment or additional actions are implemented as appropriate.
2. Greater than 85% of employees feel they can refer areas for improvement without retribution as measured on employee survey.
3. Greater than 85% of employees feel that management and the Safety Committee take their referrals under consideration as measured on employee survey.
4. Greater than 85% of employees feel that the continuous improvement program is effective at improving public and worker safety as measured on employee survey.

C3. 12-Month Target

The Company has a functioning continuous improvement program that consists of the following standardized steps:

- Areas for improvement through various means such as annual safety audit findings; root cause analysis on accidents, incidents, and near misses; management observations, employee referrals, etc.
- Develop a plan of action for improvements in the identified improvement opportunities.
- Implement the plan of action with specific staff assigned to be accountable for executing the desired measures. Use JHA program to identify areas for improvement.
- Evaluate the effectiveness of the action taken metrics and other objective observation methods.
- Determine if further action or adjustments are necessary to achieve the desired improvement.

Management and the Safety Committee reviews the continuous improvement program on a regular basis and takes action based on results of the program.

The results of the continuous improvement program are shared with employees so that they see the effectiveness and value of the program.

Employees are empowered to refer to management and the Safety Committee areas for improvement without fear of retribution.

D3. Description of Objective

A highly effective continuous improvement program will result in steady, continual, and incremental improvements in the Company's efforts to reduce wildfire risk to the public. Additionally, the continuous improvement program will enhance worker safety including workers performing wildfire mitigation safety work. The program will identify areas in public safety including wildfire mitigation initiatives that would benefit from improvement and then implement a plan to make the improvements. Likewise, this process would also identify areas for improvement in safety for workers performing wildfire mitigation work and implement a course of action to make the improvements.

Section 1. Safety Culture Objectives, Lessons Learned, and 2021 Recommendations

The texts below, other than the headings, are as they were received from the electrical corporation, presented without revision.

1.2 Objectives for the Next 3 Years

A1. Objective 1

Safety Recognition Program: Recognizing and rewarding employees that go above and beyond to enhance public and workplace safety incentivizes the right behaviors and attitudes that are essential to improving safety culture. Additionally, when Company staff or groups of employees perform above and beyond safety program targets, they should be recognized and rewarded. It should be clear to employees that performing safety program activities per the Company's standards is expected as part of their job. Recognition and reward should be reserved for above and beyond performance and results.

Objective Statement: Implement a highly effective safety recognition program that regularly recognizes and rewards employees that go above and beyond to enhance public and workplace safety and whose efforts contribute to reducing the risk of wildfire.

B1. Progress Metrics (if applicable)

Attainment of this objective is measured by:

- Records showing safety recognition awards are used regularly by management and the Safety Committee. The initial award target is 2 or more awards per year.
- Safety recognition citations document specific safety performance achievement at demonstrates above and beyond behavior.
- Greater than 85% of employees feel that recognition is provided to employees that genuinely went above and beyond in their safety performance as measured by employee survey.
- Greater than 85% of employees feel that they will be recognized if they go above and beyond and that the "system" is not rigged as measured by employee survey.

C1. 3-Year Target

Management and the Safety Committee recognize and reward employees that go above and beyond to improve public and workplace safety.

Management and the Safety Committee celebrate groups of employees or even the entire staff when performance is above and beyond safety program targets. Safety performance certificates, gift card, and recognition at staff meeting and all staff email of congratulations will be used to celebrate these employees.

Employees know that safety performance above and beyond what is expected of them will be recognized by management and their peers.

D1. Description of Objective

An effective safety recognition program will reduce the risk of wildfires and improve workplace safety for workers performing wildfire mitigation initiatives by incentivizing the right behaviors and attitudes essential to a great safety culture. A great safety culture is key to enhancing public safety and promoting workplace safety.

A2. Objective 2

Transparency and Open Communication: Transparency and open communication are essential ingredients of great safety cultures. If the lines of communication are not open, employees will not have clear direction and management will not receive the feedback it needs to make the safety culture successful.

Objective Statement: Develop multiple avenues of effective communications from management to employees and employees to management to permits the exchange of honest, relevant, and timely information that may reduce wildfire risk to the public and/or risk to employees conducting wildfire mitigation work.

B2. Progress Metrics (if applicable)

Attainment of this objective is measured by:

1. Safety audit identifies the following:

- Safety policies and procedures are widely made available in print and via online resources as evaluated in safety audit.
- Safety Committee agendas and minutes are widely published for employees to review.
- Safety Committee meetings include input from employees.
- Cross functional teams of employees are used to address safety issues.

2. Employees have a mechanism to report safety issues anonymously and/or without fear of retribution.

3. Greater than 85% of employees feel that they are encouraged to report safety hazards and that there will be no retribution as measured by employee survey.

4. Greater than 85% of employees feel that they are encouraged to recommend improvements to safety and wildfire risk reduction as measured by employee survey.

5. Greater than 85% of employees feel that their communications with management on safety matters are listened to and acted upon as measured by employee survey.

C2. 3-Year Target

Management communicates frequently with employees through safety talks. Management encourages employees to also periodically lead safety talks.

Safety policies and procedures are readily available to all employees on SharePoint.

Safety Committee meeting results are made available to employees via post meeting email.

Safety performance metrics are made available to employees via monthly Dashboard email.

Management encourages employees to report safety hazards by recognizing and rewarding them by recognition to staff at staff meeting and staff email.

Management encourages employees to make recommendations on how to reduce workplace hazards and reduce the risk of wildfire.

Employees are involved in the safety programs processes to encourage buy-in.

D2. Description of Objective

Transparent safety programs that have open lines of communications between employees and management promote a highly effective safety culture which will reduce the risk of wildfire, enhance public safety and improve worker safety for workers performing wildfire mitigation initiatives.

Transparency and open lines of communication encourage employees to report actual or potential safety issues and unsafe conditions so that management and the Safety Committee are able to take effective corrective action.

A3. Objective 3

Apply Behavior-Based Safety: Unsafe behaviors cause anywhere from 80 percent to 98 percent of all workplace accidents. By adopting a behavior-based safety culture, organizations can reduce workplace accidents and improve public safety. Behavior-based safety is a comprehensive look at safety and focuses on the behaviors of employees. It looks closely at accidents caused by unsafe behaviors and develops ways to change those behaviors and prevent injuries.

Objective Statement: Conduct an on-site safety behavior review and study of power line workers performing wildfire mitigation work and implement recommendations to reduce wildfire risk to the public and/or risk to employees conducting wildfire mitigation work as noted in the study.

B3. Progress Metrics (if applicable)

Attainment of this objective is measured by:

1. An on-site safety behavior review and study of power line workers performing wildfire mitigation work has been completed and delivered to the Safety Committee and Management for review.
2. Management adopts the recommendations of the study.
3. Greater than 85% of employees are feel that recommendations have improved safety as measured by employee survey.

C3. 3-Year Target

An on-site safety behavior review and study of power line workers performing wildfire mitigation work has been completed and the recommendations of the study have been implemented. These recommendations are leading to improved public and worker safety.

Onsite safety behavior review and study to be conducted every 4 years.

D3. Description of Objective

By adopting Behavior-based safety program, improvements in safety will be made in the way wildfire mitigation is performed, which in turn will reduce wildfire risk to the public and/or risk to employees conducting wildfire mitigation work.

A4. Objective 4

Shared Awareness of the Most Important Risks: Shared awareness of the most important risks is a priority when it comes to safety, because it is these risks that are the greatest threat to the public, workers, and the organization.

Objective Statement: Establish a highly effective campaign to educate and raise awareness that the risk wildfire is the greatest threat to the public and the electric utility has a major role in mitigating that risk.

B4. Progress Metrics (if applicable)

Attainment of this objective is measured by:

1. Completing quarterly all-employee briefing on wildfire risk and mitigations.
2. Including wildfire risk and mitigation metrics in monthly safety message to employees.
3. Greater than 85% of employees are knowledgeable of how electric utility facilities may cause ignitions as measured on employee survey.
4. Greater than 85% of employees are knowledgeable of what environmental conditions would support the rapid spread of an ignition into a wildfire as measured on employee survey.
5. Greater than 85% of employees are aware of what mitigations are effective at preventing ignitions as measured by employee survey.

C4. 3-Year Target

Management and employees are fully aware of the Company's top risk to public safety, utility caused wildfires. Employees understand why the risk exists, what environmental conditions support the spread of wildfires, and what mitigations is the Company pursuing to reduce the risk of utility caused wildfires. Employees have a strong commitment to public safety as a result of their understanding of the risk.

D4. Description of Objective

When an organization's employees have shared awareness of the risk of utility cause wildfires to public safety, their job performance will gravitate to reduce the risk of wildfires. Employees that understand the importance of what they do will drive them to ensure that their work is high quality, which will support improving public safety. Additionally, workers that have a shared understanding of the top risks will dedicate their efforts to improve workplace safety for workers performing wildfire mitigation initiatives.

Section 1. Safety Culture Objectives, Lessons Learned, and 2021 Recommendations

The texts below, other than the headings, are as they were received from the electrical corporation, presented without revision.

1.3 Lessons Learned

A1. Major Theme/ Lesson Learned 1

Leadership engagement: Engaged management and supervisors at all levels is critical to improving safety culture. Lead by example.

B1. Actions Taken

The President discussed leadership engagement with each manager and supervisor during appraisals and the importance of setting the example to improve safety culture. He also emphasized that there should be no compromise to the Company's high standards. BVES leadership conducted training on JHAs and leadership skills to enhance safety culture in March 2022. BVES leadership was also specifically trained on the importance of addressing safety planning and objectives in BVES's Weekly Management Meeting. Additionally, BVES leadership have been included in the monthly safety committee meetings to listen to concerns and address safety issues.

A2. Major Theme/ Lesson Learned 2

Safety Culture awareness among BVES employees.

B2. Actions Taken

Conducting bi-monthly Staff Meetings with all employees in which the status of current wildfire mitigation initiatives and future initiatives are briefed and explained. Furthermore, employees are briefed on how their work directly affects public safety. Distribute monthly safety Dash Board email to all employees with key performance and leading public and employee safety metrics. Conducting monthly safety training on safety topics according to the company's safety training plan. Conducted a safety logo contest with employees to develop BVES's safety logo.

Be
Vigilant about
Emphasizing
Safety in all that we do!

Winner received a day off.

A3. Major Theme/ Lesson Learned 3

Safety Program Improvements - Documentation

B3. Actions Taken

BVES updated its Injury and illness Prevention Plan (IIPP) and Hazard Communications Program documentation. BVES also developed a plan for further program documentation up dates.

A4. Major Theme/ Lesson Learned 4

Safety walk through by an outside EHS contractor indicated several areas for improvement. This backed up the value of having a third party periodically provide an assessment - these tend to be unbiased and objective.

B4. Actions Taken

BVES is working with EHS contractor to conduct an annual safety audit and further jobsite and facility reviews. These provide objective third party assessments.

A5. Major Theme/ Lesson Learned 5

Some employees not recognizing their role or importance in public safety; especially, with respect to wildfire.

B5. Actions Taken

President leads bi-monthly safety brief to staff which includes an emphasis on the role of each employees toward public safety by providing specific examples. Roles emphasized by managers/supervisors and during appraisals.

A6. Major Theme/ Lesson Learned 6

Safety Training quality needs to improve.

B6. Actions Taken

This was an issue in 2021. Quality of safety training has in fact improved substantially. However, there is still a gap in providing specialized training on certain skills to individuals or small groups of employees. This will continue to be a focus area by BVES leadership to get specialized training out to those who will benefit from it and will support improved public safety.

A7. Major Theme/ Lesson Learned 7

Implementing to the fullest extent the EHS Policy issued by the Safety and Operations Committee of the Board of Directors.

B7. Actions Taken

The Safety and Operations Committee of the Board of Directors issued an EHS Policy Statement for the Company. The statement outlines substantial policy that all employees must implement and follow. Living by the policy is challenging and it is important that leadership take action at every opportunity to demonstrate to their employees how they are following the EHS policy.

Section 1. Safety Culture Objectives, Lessons Learned, and 2021 Recommendations

The texts below, other than the headings, are as they were received from the electrical corporation, presented without revision.

1.4 2021 Recommendations

A1. Recommendation 1

4.1: Embed leadership skills development into the "Engaged Management" 12-month objective to improve the Bear Valley Safety Culture.

An important near-term objective for Bear Valley is its "Engaged Management" objective, with an emphasis on managers regularly performing Job Hazard Analyses (JHAs), working with employees to create a training plan, and demonstrating the leadership behaviors necessary to drive an effective safety culture. The plan includes managers going into the field to conduct JHAs and observe the work. It is, however, less clear whether Bear Valley has evaluated the level of preparation of its frontline supervisors to ensure they have the skills to engage in positive and effective ways with their direct reports and are able to demonstrate those skills. How supervisors communicate heavily influences employee perceptions of openness and trust. A healthy dialogue can give employees a sense that what they say is important and their opinions are valued.

Bear Valley needs to ensure that the program that supports its Engaged Management objective (a) provides supervisors the skills necessary to engage with workers in positive and effective ways, (b) supports supervisors applying these skills regularly in the field with their teams, and (c) gives supervisors access to senior leadership coaching to help sustain these efforts over time.

□ Observation: Based on the workforce survey, Bear Valley has gaps in its safety culture that vary by business unit. The Engineering and Planning unit has the strongest safety culture based on the survey results, followed by Field Operations. Accounting and Customer Service have the most considerable challenges from a safety culture standpoint.

□ Goal of Recommendation: Ensure the frontline supervisors have the skills to improve the safety culture regardless of business unit.

□ Verification Method: In next year's assessment provide a description of how the Engaged Management objective was implemented and monitored for quality. Progress should be evident in increased positivity in response to the statements "I believe managers apply the same rules for all workers," "Managers treat workers with respect," and "My supervisor makes sure all employee concerns are heard before job decisions are made" on the 2022 workforce survey.

To ensure sustainability, the progress of the Engaged Management objective in the 12-month plan needs to be monitored regularly. This requires a method for monitoring activity completion, quality, and impact. It also requires a process for supervision of progress and regular coaching. This governance process should be implemented for all the safety culture objectives, but first and foremost for the Engaged Management objective.

B1. Actions Taken

The President discussed with managers and frontline supervisors the need to improve the safety culture regardless of business unit. He provided coaching how to achieve this through open communications, listening, taking action on employee's concerns, setting the "high standards" example, and constantly emphasizing the important role their employees have in public safety.

BVES leadership conducted training on performing effective JHAs from its EHS consultant. Additionally, leadership was trained on skills to enhance their ability to effect positive safety improvements. BVES leadership was also trained on the importance of addressing safety planning and objectives at BVES's Weekly Management Meeting. All of BVES leadership are now included in the monthly safety committee meetings to listen to concerns and address safety issues.

Safety performance is the top item on all manager and supervisor appraisals. BVES has tasked its EHS contractor to check on the effectiveness of this effort with respect to employees perceptions of leadership toward safety – results are pending.

BVES leadership from the very top to line supervisors have emphasized that all employees are treated with the same rules to their employees. Additionally, BVES leadership was alerted that they must emphasize this through their actions not just words in order to make progress on this issue.

Each Supervisor conducts weekly meetings with his/her Team where they:

1. Emphasize the role each employee has in public safety.
2. Discuss the importance of listen to each other as well as other stakeholders in wildfire mitigation work.
3. Express their openness to receive suggestions on how to improve public safety.
4. Ensure employees know that reporting problems and/or their mistakes is critical to public safety.
5. Emphasize that work must only be done with the proper tools. If tools are not available or damaged, the work must stop and the situation must be resolved before starting work again. The President emphasized that if production is lost, so be it.

BVES leadership is being held accountable for the performance metrics of their employees and areas of responsibility. This was emphasized during annual appraisals. The first discussion item on leadership appraisal is a statement regarding safety performance. Performance metric goals have been set. The next step will be to set goals for program implementation. Some have already been set and achieved.

BVES has tasked its EHS contractor to check on the effectiveness of this effort with respect to employees perceptions of leadership toward safety – results are pending.

C1. Results

Leadership appears to be more aware and engaged in safety culture development. It is too early to tell how well they have done. Survey results will be a good indicator. We will continue to push and monitor this issue.

A2. Recommendation 2

4.2: In collaboration with Bear Valley's vegetation management contractor, develop and implement an action plan to address safety culture issues, in particular with regard to the flow of information about wildfire hazard mitigation

Bear Valley has done a good job developing its safety culture objectives and plan but needs to address issues concerning contractor wildfire safety, in particular the wildfire safety of its vegetation management contractor. This expanded plan should describe in detail how the contractor will address concerns about information flow regarding wildfire hazards and following procedures to control workplace and wildfire hazards.

□ Observation: Contractor employees gave low ratings on the workforce survey to several statements related to wildfire hazards and the contractor's safety culture.

Specifically, employees gave low ratings to the statements "Information about important events and lessons learned is shared within my work group;" "The company cares about my opinions;" "I feel comfortable discussing wildfire hazards with my supervisor;" and "My workgroup follows procedures to control workplace and wildfire hazards."

□ Goal of Recommendation: Ensure there is a specific plan to improve information flow among contractor employees and between contractor employees and supervisors about wildfire hazards. The plan should also include steps to increase compliance with procedures to control workplace and wildfire hazards. This plan should be developed by Bear Valley in cooperation with the vegetation management contractor.

□ Verification Method: In next year's assessment provide a description of the action plan developed by Bear Valley and the vegetation management contractor to address information flow and procedural compliance. Progress should be evident in increased positivity on the 2022 workforce survey in response to the four statements that received low scores in 2021 (see above). An important concern about this recommendation is that the vegetation management contractor may react in a punitive way to those who may have responded to the survey (despite safeguards around anonymity) and may take counterproductive actions, stifling communication instead of improving information flow. Bear Valley must take special care to prevent counterproductive actions by supervising implementation of the safety culture plan.

B2. Actions Taken

The matter was brought up with the vegetation contractor's CEO, Operations Manager, and Safety Group by BVES President.

BVES worked closely with its vegetation contractor Safety Group to address the issues identified and to ensure a specific plan was in place to improve information flow among contractor employees and between contractor employees and supervisors about wildfire hazards. The plan included steps to increase compliance with procedures to control workplace and wildfire hazards. BVES and its vegetation contractor developed the plan jointly.

The Vegetation Contractor conducted training and then examined the effectiveness of the training through an internal safety culture survey, which showed significantly improved results.

BVES meets with the vegetation contractor's field crews on a weekly basis to discuss safety issues, pass on safety and wildfire mitigation lessons learned, and improve situational awareness of operations and the environment (e.g., discuss high fire threat weather).

C2. Results

Vegetation contractor's crews performed significantly better on the internal survey. Additionally, this effort has resulted in improved communications with the vegetation contractor concerning safety culture issues at the management and field personnel levels. We will continue to monitor this issue.

Section 2. Supporting Documentation

In this section, the electrical corporation provides any additional supporting documentation that would help Energy Safety assess their organizational safety culture.

Nil

The logo for nsc features a stylized icon of four squares in a 2x2 grid, with the top-right square being a lighter shade of green. To the right of this icon, the lowercase letters "nsc" are written in a bold, green, sans-serif font. The logo is positioned in the upper left quadrant of the image, overlaid on a background of power lines and towers.

nsc

