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March 22, 2024

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Subject: 2023 Safety Culture Assessment for Southern California Edison Company

Mr. Ulrich:

Enclosed is the 2023 Safety Culture Assessment (SCA) for Southern California Edison Company (SCE) 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 the process approved though Public Utilities Code section 8389(d)(4).

On February 23, 2024, Energy Safety provided SCE with a draft of its 2023 SCA for factual review. On March 8, 2024, SCE provided its written response to Energy Safety. Energy Safety considered SCE's written response and determined that no corrections to the draft SCA were necessary. Section 6 of the enclosed SCA includes SCE's full written response to the draft 2023 SCA for SCE.

SCE 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 SCE submitting a letter to this effect to the 2023 Safety Culture Assessments docket (Docket #2023-SCAs).[1]

Sincerely,

Suzie Rose
Program Manager, Electrical Safety Policy Division
Office of Energy Infrastructure Safety

[1] 2023 Safety Culture Assessments (SCAs) docket (https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-SCAs, accessed February 23, 2024).

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The Office of Energy Infrastructure Safety's 2023 Safety Culture Assessment

Southern California Edison

Prepared by the National Safety Council

Published March 2024

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Executive Summary

The Office of Energy Infrastructure Safety's (Energy Safety's) third annual Safety Culture Assessment (SCA) of electrical corporations in California took place from June to September 2023. 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 2023, Energy Safety's Safety Culture Assessment contractor was the National Safety Council.

According to its SCA inputs in 2021, 2022, and 2023, Southern California Edison Company (SCE) has exhibited continued growth in safety culture maturity. SCE's 2023 management self-assessment demonstrates an organization that considers itself at the highest level of maturity for 18 of the 22 questions, with a focus on maturity for safety enabling systems. SCE reported improving its rating for "quality of event investigations" from Stewardship to Citizenship in 2023 with the goal of further increasing the question relating to "results of investigations" from Stewardship to Citizenship in 2024.

Participants in SCE's 2023 workforce survey assigned relatively high scores to the statements on the survey, with an overall average of 4.17 out of a possible 5, indicating a mature safety culture. In addition, half the statements had the same or better scores when compared to the baseline year of 2021. However, SCE's workforce survey scores declined from 2022 to 2023 for 28 of 30 statements, with the largest decline in the wildfire safety category (declining to 4.18 compared to 4.37 in 2022). Despite this decline, the focus group session with frontline employees, supervisors, and contractors revealed positive and optimistic perceptions about SCE's safety culture. Focus group participants described SCE as having opportunities to improve but moving in the right direction. In addition, inputs to the 2023 SCA process indicate that SCE is succeeding in integrating contractors into its safety culture. This is evidenced by the favorable response scores submitted by contractors on the workforce survey. SCE contractor employees provided an average total

response score of 4.38 in 2023 as compared to SCE employees' average total response score of 4.16.

Although there is evidence of improvement in SCE's safety culture from the baseline year of 2021, SCE still has key opportunities for further improvement. To drive consistent improvement in its safety culture throughout the organization, SCE should act on the recommendations listed below.

- SCE should build its capacity as a learning organization. It should take a proactive approach to incorporating feedback to improve organizational processes. It should also take steps to increase workers' psychological safety to improve the quantity and quality of safety event (near-miss and hazard) reports.

- SCE should continue efforts to improve safety communications between leadership and frontline workers.

- SCE should increase training for frontline workers on wildfire suppression and the installation and operation of new technologies related to wildfire mitigation, including rapid earth fault current limiter (REFCL) devices.

- SCE should continue to recognize and take action to mitigate the risk exposure posed by interactions with the public.

- SCE should increase engagement on the safety culture assessment within the workforce supporting wildfire mitigation initiatives.

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 informed by the SCA process as set out in Resolution SPD-6, adopted by the California Public Utilities Commission (CPUC) on December 1, 2022.[2] The framework for Energy Safety's SCA, included in Resolution SPD-6,[3] 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.

1.2 Overview

Pursuant to Public Utilities Code Section 8389(d)(4),[4] Energy Safety must conduct an annual SCA for each California electrical corporation.[5] Energy Safety contracted the

[1] Safety Culture Assessment Guidelines for Electrical Corporations (April 2023) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true, accessed Feb. 28, 2024).
[2] Resolution SPD-6 "Resolution Adopting Safety Culture Assessment Process for Electrical Corporations Pursuant to Public Utilities Code § 8389(d)(4)" (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M499/K482/499482543.pdf, accessed Sept. 28, 2023).
[3] Resolution SPD-6 "Resolution Adopting Safety Culture Assessment Process for Electrical Corporations Pursuant to Public Utilities Code § 8389(d)(4)" page 11 (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M499/K482/499482543.pdf, accessed Sept. 28, 2023).
[4] The full text of Public Utilities Code section 8389 (https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8389.&lawCode=PUC, accessed Sept. 28, 2023).
[5] In 2023, the California electrical corporations required to participate in Energy Safety's Safety Culture Assessment were Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company (SCE), Liberty Utilities, PacifiCorp, Bear Valley Electric Service, Inc., Horizon West Transmission, Trans Bay Cable, and LS Power Grid California.

National Safety Council (NSC)[6] to conduct the third annual SCA, which took place between June and September 2023.

1.2.1 Focus of Energy Safety's SCA

Energy Safety's SCA is distinct and complementary 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.

1.2.2 Energy Safety's SCA Components

Energy Safety published the 2023 SCA Guidelines in April 2023.[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 utilities[8] (Large IOUs):** Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (SCE).

[6] The National Safety Council is a nonprofit, mission-based organization focused on eliminating the leading causes of preventable death and injury.
[7] Safety Culture Assessment Guidelines for Electrical Corporations (April 2023) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true, accessed Feb. 28, 2024). See Energy Safety's Safety Culture Assessments web page for more information (https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-%20safety/safety-culture-assessments/, accessed Feb. 28, 2024).
[8] In this document "utility" means "electrical corporation."

- **Small and multijurisdictional utilities (SMJUs):** Liberty Utilities, PacifiCorp, and Bear Valley Electric Service, Inc.
- **Independent transmission operators (ITOs)**: Horizon West Transmission, Trans Bay Cable, and LS Power Grid California.

The 2023 SCA process included a management self-assessment with a summary plan for 2024, 12-month and 3-year safety culture objectives, lessons learned, progress on the 2022 SCA recommendations, a workforce survey, and follow-up interviews to give context and clarity to the management self-assessment (one interview) and workforce survey (one interview in the form of a focus group session). See below for more details about each of these components. The SCA Guidelines require different categories of electrical corporations to complete different components of the SCA as follows:[9]

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

[9] See Section 2 "Application of Safety Culture Assessment Components to Different Electrical Corporations," Safety Culture Assessment Guidelines for Electrical Corporations (April 2023) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true, accessed Feb. 28, 2024).

Component	Electrical corporations that must complete this component	Commentary
		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.
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 2023 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 and 2022 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 on the high end to strongly disagree on the low end.[10] The statements are framed in a positive light (e.g., "managers treat workers with respect"), so greater agreement—and an associated higher score—indicates a better opinion of the organization's performance.

NSC assisted the electrical corporations in administering the workforce survey within the period of June 26 to July 24, 2023. NSC provided electronic survey administration options and provided Spanish translation upon request.

1.2.2.2 Management Self-Assessment with 2024 Summary Plan

The management self-assessment was only completed by the large electrical corporations in the 2024 SCA process.

1.2.2.3 Safety Culture Objectives, Lessons Learned, and Progress on the Previous Year's 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 the previous year's

[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/, accessed Sept. 29, 2023).

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 2022 SCA recommendations.

1.2.2.4 Interviews

Follow-up interviews were only conducted with the large electrical corporations in the 2023 SCA process. These interviews were intended to give context and clarity to SCA inputs and consisted of two interviews per electrical corporation: one to follow-up on the management self-assessment and one to follow-up on the workforce survey (in the form of a focus group session).[12]

1.2.2.5 Observational Visits

The 2023 SCA process did not include observational visits due to time constraints.

[11] See Section 2 "Application of Safety Culture Assessment Components to Different Electrical Corporations," Safety Culture Assessment Guidelines for Electrical Corporations (April 2023) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true, accessed Feb. 28, 2024).
[12] Note that in 2023, there was a single workforce focus group session per large electrical corporation, whereas in 2022, there were three such sessions per large electrical corporation.

1.2.2.6 Supporting Documentation

The SCA Guidelines provide that Energy Safety may ask for supporting documentation.[13] 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 2022 recommendations permitted electrical corporations to upload additional supporting documentation as attachments to illustrate actions taken since the 2022 SCA.

[13] See the Safety Culture Assessment Guidelines for Electrical Corporations Section 6.2 "Documentation to Support Responses to the Management Self-Assessment" for more information about supporting documentation Energy Safety may require (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true, accessed Feb. 28, 2024).

2 SCE Inputs and Findings

2.1 SCE Inputs to the SCA

The findings and recommendations below are based on SCE's inputs to the 2023 SCA, including its management self-assessment with 2024 summary plan, safety culture objectives, lessons learned, progress on 2022 recommendations, a workforce survey, the management self-assessment follow-up interview with contributors to the assessment, and one workforce interview in the form of a focus group with members of the workforce targeted by the workforce survey: those who spend at least 10 percent of their time engaged in wildfire mitigation activities.[14] As a large electrical corporation, SCE was required to complete all components of the SCA process.

In 2023, the first step of the SCA process was submission of the management self-assessment with a summary plan for 2024, safety culture objectives, lessons learned, and progress on 2022 recommendations. SCE submitted these components on July 7, 2023.

SCE did not append any supporting documentation to its submission.

On July 25, 2023, NSC conducted a 90-minute follow-up interview with SCE's contributors to the management self-assessment and accompanying components. In the interview, NSC asked questions to better understand SCE's practices regarding leadership selection and promotion, efforts to create a safe environment for employees to speak-up, training and support resources for frontline workers, accountability for wildfire safety, wildfire safety measures, and protocols around hazard identification and control.

Following receipt of the management self-assessment and accompanying components, NSC (via SCE) administered the SCE workforce survey using an anonymous online

[14] See Section 5 for SCE's safety culture objectives, lessons learned, progress on 2022 recommendations, and 2023 workforce survey results.

survey between June 26 and July 24, 2023. NSC encouraged SCE 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 1,113 SCE employees and contractors responded to the workforce survey. Of these, 994 identified as employees, 107 identified as contractors, and 12 did not identify their employee status. SCE reported a base number of 3,907 employees and 3,315 contractors (estimated) working on wildfire mitigation. With these base numbers, SCE achieved a 15 percent overall response rate for its wildfire mitigation workforce with an employee response rate (excluding contractors) of 25 percent, compared to a 37 percent employee response rate in 2022 and 38 percent employee response rate in 2021.[15, 16] SCE elicited 107 contractor responses out of a base number of 3,315 contractors, a 3 percent response rate, down from 36 percent in 2022.[17] Additionally, approximately 1,500 employees previously targeted for participation in the survey were not included in 2023, representing a 17 percent decrease from 2022.[18]

Finally, following the initial analysis of workforce survey data, NSC conducted a single focus group for SCE frontline workers, frontline supervisors, and contractors who play a direct role in wildfire mitigation. As in 2022, NSC conducted the focus group session using

[15] SCE did not provide an estimated base number of wildfire mitigation contractors in 2021.
[16] Although the 2022 survey included a paper option and the 2023 did not, the proportions of different categories of employees represented in the responses remained stable across from 2022 to 2023.
[17] The reduced response rates for employees and contractors may be associated with the timing of the survey coinciding with the onset of fire season, so workforce availability may have been a barrier to participation.
[18] In response to Energy Safety's inquiry regarding SCE's reduction of the workforce targeted for the workforce survey in 2023, on Oct. 27, 2023, SCE's Regulatory Affairs (Wildfire & Public Safety) leadprovided the following information: (1) "A portion of the discrepancy was due to organizational movement/alignment that caused difficulty to clearly validate the wildfire mitigation population. As a result, ~800 employees in the Transmission group were removed from the list because it was determined they did not support wildfire work at least 10% of their time." (2) "Upon further research, we discovered ~700 names in the Distribution organization didn't make it on the list due to a copy/paste error. These employees were not sent the survey this year, but will be added back to the distribution list in 2024. Overall, the 'true' 2022 vs. 2023 variance is ~800 employees, mainly driven by organizational realignment."

an online virtual meeting platform, with an option to join via a teleconference line. The SCE focus group session was held on September 6, 2023.

The purpose of the focus group was to better understand how frontline workers, contractors, and supervisors view the organization's safety culture and identify priority areas for improvement. The focus group session followed a semi-structured format including open-ended prompts that allowed for further questioning to gain insights into the following:

- What are the top three hazards you face on the job?
- How would you describe the safety culture in your organization?
- What shortcuts do people take?
- How are wildfire hazards identified and communicated to you?
- How are lessons learned about safety or wildfire mitigation communicated to you?
- How are frontline employees involved in company-wide safety meetings and how can these meetings be improved?
- How do daily safety meetings help keep you safe and how can daily safety meetings be improved?
- What changes have you seen in safety culture in your organization or work group?
- How does the organization address safety issues (including wildfire hazards) that are reported by frontline workers?

- How does the organization incentivize the reporting of near misses?[19]
- How well do people work together in your work group?
- What are three words to describe the safety culture of your organization?

A total of 13 individuals participated in the focus group session, representing different employment levels and SCE business units. Of the 13 participants, 6 were frontline workers (including a vegetation management contractor), 6 were supervisors, and 1 was in a frontline support role.

Focus group participants made observations that described the safety culture as reactive, rule centric, and overly focused on the number of safety issues reported each month. One participant remarked "We have overcomplicated things trying to reach that imaginary zero goal." Other feedback offered by participants in the focus group concerned barriers to incident- or near-miss reporting, active participation in urgent events, risks involved in interactions with the public, and a preference for hands-on training. Insights from the focus group session are provided below as illustrations of improvement opportunities for SCE.

2.2 Strengths

Through its SCA inputs, SCE has demonstrated safety culture strengths, identified in the following section. SCE should continue to build on these to advance its safety culture.

2.2.1 Leadership's Strong Commitment to Safety

Excellence in safety depends on strong leadership to uphold its core values and the ability of employees to shape and contribute to a safety culture where safety is an

[19] Near miss: an unplanned event that did not result in injury, illness, or damage, but had the potential to do so. Safety Culture Assessment Guidelines for Electrical Corporations (April 2023) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true, accessed Feb. 28, 2024).

uncompromised priority. When leaders model a sincere commitment to safety, it sets a powerful expectation for the organization that can positively influence safety culture.

Through its 2021, 2022, and 2023 SCA inputs, SCE has demonstrated its leadership's continued commitment to safety. Specific actions reported by SCE in 2023, included providing one-on-one coaching for leaders to help them better demonstrate safety ownership and coaching tools to improve "felt leadership" (employee perception of leadership engagement) when they are in the field. SCE reports continuing the practice of conducting leader-led organizational-wide "Safety Stand Ups" addressing themes from SCE's internal safety culture assessment. SCE also reports continuing its practice of using the employee "Safety Culture Pulse" surveys to assess cultural indicators such as felt leadership and the amount of time leaders spend in the field and providing leaders with cognitive behavioral safety culture training to improve recognition of safety quantity and quality. According to SCE's 2023 management self-assessment,[20] SCE plans to expand the Human and Organizational Performance (HOP) training begun in 2022 for SCE's Substation Construction and Maintenance group to Transmission and Distribution (T&D) "and beyond."[21] In its response to the 2022 recommendation on building SCE's capacity as a learning organization, SCE referenced the expanded HOP training as "expanded

[20] See Section 5 for SCE's 2023 safety culture objectives, lessons learned, and progress on 2022 recommendations.

[21] In its May 1, 2023, response to its 2022 SCA report, SCE described its approach to rolling out the HOP training thus: "SCE's strategy has been to implement HOP training across the company based on organizational readiness, and to support the training with sustainability efforts that help integrate HOP principles across all levels of the organization over time." SCE does not list the HOP principles, but they are indicated by their author, Dr. Todd Conklin, as "Human error is normal," "Blame fixes nothing," "Learning is vital," "Context drives behavior," and "How you respond to failure matters. How leaders respond to failure matters a lot." See SCE's "Comments on the Draft 2022 Safety Culture Assessment for Southern California Edison" appended at the end of SCE's 2022 SCA report from May 2023 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53799&shareable=true, accessed Oct. 24, 2023). See more information on Dr. Todd Conklin's HOP principles in "Improving culture of care through maximising learning from observations and events: Addressing what is at fault" (Robinson et al., 2022) (https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9082962/#bibr15-00236772211037177, accessed Oct. 24, 2023). See more on *The 5 Principles of Human Performance* on Google Books (Conklin 2019) (https://books.google.com/books/about/The_5_Principles_of_Human_Performance.html?id=w6BawQEACAAJ, accessed Oct. 24, 2023).

communications for frontline employees that link root cause, lessons learned and work practices."

The two highest scoring workforce survey statements in 2023 were "I take responsibility for the safety of myself and others in my work area" and "Protecting the community from wildfire hazards is clearly a high priority with management." The statement "Managers treat workers with respect" had the second-highest increase in average score from 2022 to 2023 (0.01), with "People in my workgroup treat each other with respect" increasing the most (0.1).

2.3 Opportunities

SCE has several areas where it can strengthen its safety culture. The following section describes the areas where SCE should prioritize improving its safety culture. Specific recommendations are described in Section 3.

2.3.1 Incident Reporting

On the 2023 workforce survey, one of the lowest-scored statements was "People report mistakes they make, even if others do not notice them,"[22] with 37 percent of respondents answering neutrally or disagreeing with the statement. Additionally, "People in my workgroup report all wildfire hazards," in the wildfire safety category, had a below-average score and the third-highest rate of neutral responses or disagreement in this category (23 percent).

Participants in the focus groups in all three years (2021, 2022, and 2023) conveyed that workers hesitate to report near misses because it could lead to a new rule, sometimes adding that the near miss would not have happened if workers adhered to existing safety

[22] The four statements that have consistently scored the lowest on SCE's workforce survey since 2021 are: "People report mistakes they make, even if others do not notice them" (three-year average score: 3.79); "The company cares about my opinions" (three-year average score: 3.75); "People focus on one task at a time and avoid distractions" (three-year average score: 3.72); and "I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them" (three-year average score: 3.52).

protocols. In the 2023 workforce focus group, one participant indicated that people in their work group may not report a near miss because there's the "perception that […] you're going to get busted for something." Another participant shared that employees are not comfortable with formal reporting but are comfortable discussing an incident with peers, when management isn't in the room.

See the corresponding recommendation in Section 3.1 of this report.

2.3.2 Safety Communication

Workforce survey responses and focus group input indicated opportunities for improvement in SCE's communication with frontline workers, particularly around safety communication.

Two of the lowest-scoring workforce survey statements in 2023 were also two of the lower-scoring statements in 2021 and 2022: "I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them," and "The company cares about my opinions."

Participants in the workforce focus group indicated a concern that frontline employees' concerns are not being given adequate consideration by management. One participant offered that their "experience with bringing up issues has been a negative one," describing a safety problem they elevated regarding cribbing (e.g., temporary wooden support structures) that they feel was not tracked or addressed in a timely fashion. The participant stated they experienced a safety incident related to cribbing that could have been avoided and that still has yet to be addressed but is not being addressed because "it's not the flavor of the month." Another focus group participant commented "you've got a bunch of people in the office making rules and procedures, [but] they're not hearing what the field employees are saying."

Additionally, there is a notable trend in the workforce survey responses across all three large IOUs (PG&E, SCE, and SDG&E) for all three years (2021, 2022, and 2023) wherein

the lowest-ranked categories of employees (in the case of SCE, “individual contributor”) gave lower scores than the other categories of employees, with the scores trending higher with increased rank and the highest-ranked employees giving the highest scores. The overall average score for all years for SCE’s lowest-ranked categories of employees is 4.16 out of 5, with 5 indicating the highest opinion of the organization’s performance, while the highest-ranked category has an average score of 4.39 out of 5, a difference of 0.23. This may indicate a lack of understanding of frontline safety culture challenges at the top of the organization and an associated opportunity for building SCE’s capacity as a learning organization through feedback mechanisms like cross-departmental safety listening sessions.

Regarding other safety communication challenges, one participant in the focus group session talked about getting an equipment guide authored by CAL FIRE sent to them by 10 different people: “it can cause confusion,” adding, “that can be a hazard as well.” Another participant agreed, noting that sometimes there is “overcommunication” leading to confusion or a worker not knowing what is “the latest.”

Other participants recounted that communications are not standardized among districts, leading to workers in different groups receiving different instructions. Another participant described problems with email as a primary communication for wildfire hazards since some workers do not check email regularly.

One participant wished for better communication between SCE and its public safety partners in the instances where SCE workers are required to stay in their trucks (“cab-up”) with the air conditioner running due to poor air quality during a wildfire, in compliance with Occupational Safety and Health Administration (OSHA) requirements. The participant felt that others, such as fire fighters and colleagues from other electrical corporations, perceived them as not doing their job, suggesting that it would be helpful if SCE could communicate the health and safety limitations it puts upon SCE frontline workers in wildfire response: “we should probably put something out in a media process, […] [in the] local

newspaper, Facebook, whatever." This transparency might make it easier for frontline workers to comply with SCE's health and safety requirements during wildfire response.

See the corresponding recommendation in Section 3.2 of this report.

2.3.3 Training

Participants in the focus groups in all three years (2021, 2022, and 2023) indicated a need for hands-on training for important processes and proper use of tools and equipment. Participants felt online training or "just reading a manual" are insufficient, particularly with new approaches or equipment. One 2023 focus group participant noted that the quality of training depends on your supervisor: "a bulletin [will] come out […] and some supervisors will hand it to you and that will be it, and then there will be other supervisors who will dig in deep to it and have an actual training session on it." The lack of standardization of training was also a concern for one focus group member regarding continuity of hazard identification. Additionally, one focus group member stated that all "a recommendation for field workers is basic [fire] suppression training," so that in the event they encounter a fire they know how to respond.

In response to the 2022 recommendation on wildfire mitigation technology training, particularly regarding rapid earth fault current limiter (REFCL) devices, SCE reported that it "[c]ontinue[d] delivering REFCL training to frontline workers with enhanced training materials," without specifying the nature of the enhancement.[23, 24]

See the corresponding recommendation in Section 3.3 of this report.

[23] See Section 5 for SCE's 2023 safety culture objectives, lessons learned, and progress on 2022 recommendations.
[24] Due to a short reporting period for the 2023 SCA reports, the electrical corporation had limited time to make progress on the 2022 recommendations.

2.3.4 Risk from Interactions with the Public

As in 2021 and 2022, SCE's 2023 focus group participants talked about risks posed by interactions with the public. In 2023, several participants underscored the ongoing nature of this hazard.

Although SCE indicated in its management self-assessment that threats against workers from the public have declined,[25] the risk posed by hostile interactions with the public remains a significant safety concern for SCE's frontline workers.

See the corresponding recommendation in Section 3.4 of this report.

2.3.5 Engagement in Workforce Survey

SCE's workforce survey return was much lower in 2023 than it has been thus far. The employee response rate went down from 38 percent in 2021 and 37 percent in 2022 to 25 percent in 2023.

See the corresponding recommendation in Section 3.5 of this report.

[25] "Compared to Q4 2022, there was a 47% reduction (17 to 9) in customer threats against employees and contractors in Q1 2023. This includes a 37.5% decrease (8 to 5) in customer threats based on property access." See Section 5, 2022 Recommendations, SCE's response to its 2022 recommendation "Mitigate Risk Exposure Posed by Interactions with the Public."

3 Recommendations

Culture change takes time, dedication, and starts with understanding where a company is on its organizational safety journey and the underlying drivers influencing the workforce. The recommendations in this report are based on observations from SCE's 2023 SCA inputs: a management self-assessment with summary plan for 2024; safety culture objectives; lessons learned; progress on 2022 recommendations; a workforce survey; and the follow-up interviews that gave context and clarity to the management self-assessment and workforce survey. Most of the recommendations included here build on recommendations from SCE's 2022 SCA report;[26, 27] one is newly introduced based on SCE's 2023 assessment.

Recommendations for SCE 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 Continue to Build SCE's Capacity as a Learning Organization

SCE should continue to build its capacity as a learning organization,[28] taking a proactive approach to incorporating feedback to improve organizational processes. It should focus on improving safety-enabling systems such as the investigation and root cause analysis of incidents. It should offer more opportunities for frontline workers and contractors to discuss

[26] SCE's 2022 Safety Culture Assessment (May 2023) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53799&shareable=true, accessed Oct. 24, 2023).
[27] Due to a short reporting period for the 2023 SCA reports, the electrical corporation had limited time to make progress on the 2022 recommendations. Therefore, the 2022 recommendations are continued herein.
[28] Learning organization: an organization skilled at creating, acquiring, and transferring knowledge, and at modifying its behavior to reflect new knowledge and insights. Safety Culture Assessment Guidelines for Electrical Corporations (April 2023) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true, accessed Feb. 22, 2024).

lessons learned from safety events (near-misses and hazards) to foster psychological safety (i.e., a sense of safety that allows workers to feel empowered to speak up).[29] This recommendation is continued from the 2021 and 2022 SCA.

Pursuant to its Human and Organizational Performance (HOP) training, SCE should develop an action plan to ensure that leaders are implementing these training concepts. As part of its action plan, SCE should measure frontline leaders' progress on implementing training concepts such as coaching conversations to provide accountability and allow SCE to evaluate its improvement through learning and refine actions as needed.

Further, SCE should develop and implement a plan to increase the quantity and quality of safety event (near-miss and hazard) reports submitted by frontline employees. The effectiveness of an event investigation depends on the quality of the information reported about the event. Workers not feeling comfortable reporting mistakes may lead to underreporting. More detail in safety event reporting should in turn lead to higher-quality lessons learned, maximizing the opportunity to prevent future such events.

3.1.1 Observations

In the workforce survey, a high percentage of respondents answered neutrally or disagreed with the statement "People report mistakes they make, even if others do not notice them" (37 percent) and "People in my workgroup report all wildfire hazards" had the third-highest rate of neutral responses or disagreement in the wildfire safety category (23 percent).

Participants in the focus groups in all three years indicated that workers hesitate to report near misses because it could lead to a new rule and because of a fear of negative consequences.

[29] A "psychologically safe work environment" is "one in which employees feel safe to voice ideas, willingly seek feedback, provide honest feedback, collaborate, take risks and experiment" (Psychological safety: A systematic review of the literature, Newman, Donohue, and Eva [2017] [https://www.sciencedirect.com/science/article/pii/S1053482217300013, accessed Oct. 27, 2023]).

3.1.2 Goals of Recommendation

The goal of this recommendation is to continue to build SCE's capacity as a learning organization, including increasing workers' psychological safety to improve the quantity and quality of incident and near-miss reports.

3.1.3 Verification Method

In its 2024 SCA management self-assessment, SCE must include a report on its action plan to ensure frontline leaders are implementing training concepts such as coaching conversations, including a way of measuring implementation. SCE must also provide a description of how it increased the quantity and quality of incident- and near-miss reports and how it increased the opportunities for frontline employees and contractors to share lessons learned from safety events.

Progress should be evident on future workforce surveys through an increase in the average response score to the statement "People report mistakes they make, even if others do not notice them."

3.2 Strengthen Safety Communications

Although SCE has made substantial efforts since 2021 to address communication issues between leadership and frontline workers, frontline workers continue to report that SCE could improve in this area. SCE should continue efforts to improve safety communications between leadership and frontline workers. This recommendation builds on a SCA recommendation from 2022.

SCE should consider deploying an incident management team liaison to the field during incidents to be a part of monitoring and service restoration to better understand the frontline workers' experiences. SCE should also continue to implement measures to increase organizational learning through regular cross-departmental topic-specific safety

listening sessions. These actions should help leadership gain a better understanding of frontline issues and provide an opportunity to recognize workers' accomplishments.

3.2.1 Observation

Two of the lowest-scoring workforce survey statements in 2023, 2022, and 2021 were "I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them," and "The company cares about my opinions."

Participants in the workforce focus group indicated that frontline employees' concerns are not being given adequate consideration by management, including safety-related concerns.

There is a trend in the workforce survey responses wherein the lowest-ranked categories of employees give lower scores than the other categories of employees, with the scores trending higher with increased rank and the highest-ranked employees giving the highest scores. As noted above in Section 1.2.2.1, the statements are framed in a positive light (e.g., "managers treat workers with respect"), so greater agreement—and an associated higher score—indicates a better opinion of the organization's performance.Participants also indicated a problem with "overcommunication" and a need for streamlining of safety communications to avoid confusion. Participants also noted a need for standardization of training (e.g., in response to bulletins) among work groups.

One participant indicated that it would be helpful if SCE could communicate the health and safety limitations it puts upon SCE frontline workers in wildfire response.

3.2.2 Goal of Recommendation

The goal of this recommendation is to increase worker engagement through effective communication, increase frontline workers' input regarding wildfire safety and other safety concerns, and improve the response to that input by management.

3.2.3 Verification Method

In its 2024 management self-assessment, SCE must provide a description of how it improved safety-related communications with frontline workers.

Progress should be evident on future workforce surveys through an increase in the average response score for statements “I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them” and “The company cares about my opinions.”

Furthermore, progress should be evidenced by future workforce focus group participant responses when asked about SCE safety communications.

3.3 Improve Training for Frontline Workers on Wildfire Suppression and Mitigation Technology

SCE should continue to improve its training for frontline workers, particularly concerning wildfire suppression and the installation and operation of new technologies related to wildfire mitigation (e.g., rapid earth fault current limiter [REFCL] devices). SCE should also increase training options to include more hands-on and less computer-based delivery.

3.3.1 Observations

In its 2023 report on its 2022 recommendations, SCE reported that it continued providing training on REFCL using “enhanced training materials” without specifying the nature of the enhancement.

2023 focus group participants expressed that they would prefer hands-on training for new equipment or tools. Focus group participants also suggested all field workers would benefit from basic wildfire suppression training.

3.3.2 Goals of Recommendation

The goal of this recommendation is to improve frontline worker training, particularly concerning wildfire suppression and mitigation technology.

3.3.3 Verification Method

In its 2024 management self-assessment, SCE must provide a description of steps it has taken to standardize trainings among work groups (e.g., on new bulletins). It must also provide more details on how it has enhanced its training materials for its trainings on new wildfire mitigation technology, in particular regarding REFCL. It must also provide information on how it trains frontline workers on basic wildfire suppression techniques for all field workers.

3.4 Mitigate Risk Exposure Posed by Interactions with the Public

SCE should continue to recognize and take action to mitigate the risk exposure posed by interactions with the public.

Although SCE reported there was a reduction in customer threats against employees and contractors from the fourth quarter of 2022 to the first quarter of 2023, multiple focus group participants identified interactions with the public as a primary safety concern. SCE should continue to track these incidents and further strengthen its strategy for managing risk exposure posed by interactions with the public.

Conflict with the public is not only a problem for worker safety and morale, but could meaningfully hamper wildfire mitigation activities, such as through property owners refusing work crews access to property where hazardous vegetation poses a wildfire threat.

3.4.1 Observations

SCE's focus group participants identified interactions with the public as a top job hazard, particularly in vegetation management.

3.4.2 Goals of Recommendation

The goal of this recommendation is to reduce the risk exposure to the workforce posed by interactions with the public.

3.4.3 Verification Method

In its 2024 SCA management self-assessment, SCE must provide a description of its progress on reducing hostile interactions with the public. SCE must also provide:

1. Information on any improvements made to the system used to track hostile interactions with the public.
2. Details on specific actions and process improvements to reduce the number of touchpoints or multiple visits to the same location, particularly when prior conflict has occurred at a particular location.
3. Information on outcomes from training programs aimed at reducing conflict with the public (e.g., training provided and any evidence of improvements in interactions with the public using tactics learned in the training).
4. Information on any improvements made in bilingual support resources for Spanish-speaking crews.

3.5 Increase Engagement in Workforce Survey

3.5.1 Observation

The workforce survey response rate was low relative to SCE's rate in previous years. In the future, SCE must employ a more robust communication strategy that involves senior

leadership to promote the survey. It must consider ways to diversify the tactics for soliciting survey responses from the workforce.

3.5.2 Goal of Recommendation

The goal of this recommendation is to improve engagement in next year's workforce survey.

3.5.3 Verification Method

SCE must demonstrate an increased workforce survey response rate in 2024. The goal should be to always improve on the previous year's response rate.

4 Conclusion

This report provides the findings and recommendations from SCE's 2023 SCA, its third under Public Utilities Code section 8389(d)(4). Following the publication of this report, SCE 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 SCE. 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 SCE'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

5.1 Workforce Survey Results

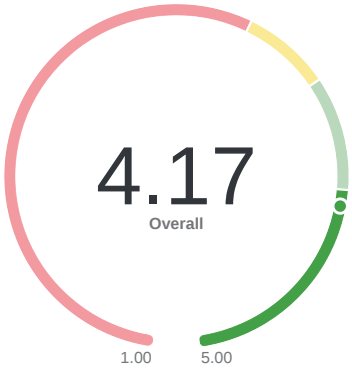
Energy Safety Workforce Survey 2023:
Overall Results and 30 Standard Statements

This page contains average response scores and percent distributions of response categories for the overall survey.

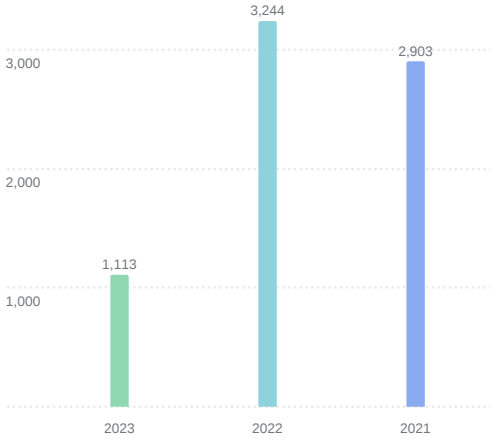
Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*
Response Categories: *Strongly Disagree = 1 (Red), Disagree = 2 (Orange), Neutral = 3 (Yellow), Agree = 4 (Light Green), Strongly Agree = 5 (Dark Green)*

Average Response Scores

Average Response Score 2023

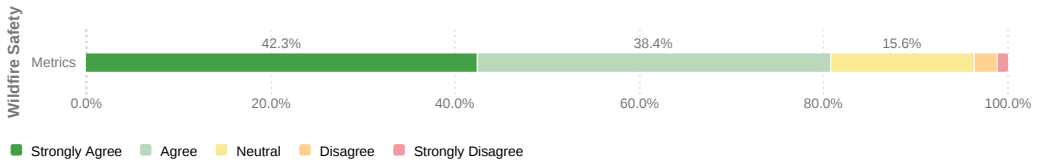


Response Count 7,260

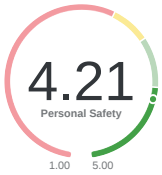


Wildfire Safety 2023

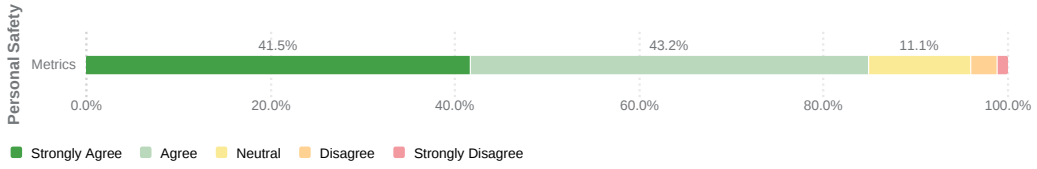
Percent Distributions 2023



Personal Safety 2023

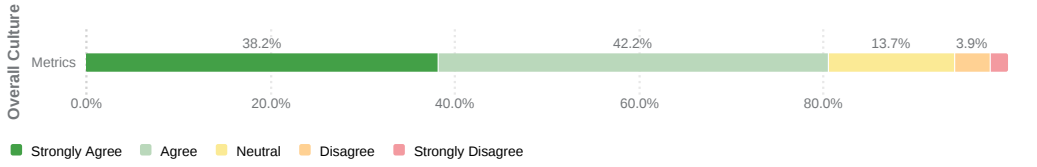


Percent Distributions 2023



Overall Culture 2023

Percent Distributions 2023



Energy Safety Workforce Survey 2023: Overall Results and 30 Standard Statements

Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*
Change Score Metrics: Increase in Score: > 0 (Blue), Decrease in Score: < 0 (Red), No Change in Score: = 0 (Gray)

Overall Average Response Scores by Statement

Wildfire Safety	2023	2022	2021	Change 2022-2023	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Protecting the community from wildfire hazards is clearly a high priority with management	4.52	4.56	4.52	-0.040	61%	32%	6%	1%	1%
I feel comfortable discussing wildfire hazards with my supervisor	4.43	4.56	4.28	-0.127	57%	34%	7%	1%	1%
Our management acts quickly to address wildfire hazards	4.24	4.40	4.30	-0.164	44%	39%	14%	1%	1%
Wildfire and personal safety concerns are communicated openly	4.33	4.52	4.35	-0.187	47%	42%	9%	1%	1%
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.34	4.53	4.25	-0.191	46%	44%	8%	1%	1%
People in my workgroup report all wildfire hazards, no matter how minor	4.12	4.34	4.10	-0.218	38%	39%	20%	2%	1%
Leaders actively seek out signs of potential wildfire hazards	4.08	4.31	4.06	-0.229	35%	41%	21%	2%	1%
People look for wildfire hazards and risks as work progresses	4.11	4.36	4.17	-0.251	34%	46%	18%	2%	1%
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.45	3.74	3.37	-0.292	18%	29%	38%	11%	5%

Overall Average Response Scores by Statement

Personal Safety	2023	2022	2021	Change 2022-2023	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
I take responsibility for the safety of myself and others in my work area	4.66	4.66	4.68	-0.003	69%	29%	2%	0%	1%
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.44	4.44	4.45	-0.006	56%	34%	8%	1%	1%
Pausing work for hazards and safety concerns is viewed positively	4.43	4.46	4.46	-0.031	52%	40%	6%	1%	1%
Leaders use mistakes and incidents as learning opportunities	4.25	4.31	4.30	-0.065	42%	45%	10%	2%	1%
People have the skills they need to resolve workplace safety issues	4.18	4.26	4.24	-0.078	35%	52%	10%	2%	1%
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.26	4.35	4.34	-0.088	45%	40%	12%	2%	1%
Leaders keep people prepared to intervene when an emergency occurs	4.18	4.29	4.19	-0.106	38%	47%	12%	2%	1%
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.25	4.37	4.31	-0.118	40%	47%	10%	2%	1%
We have the right tools for the job	4.00	4.15	4.04	-0.150	29%	50%	14%	6%	1%
People have the ability to respond to and correct problems and errors before they get out of control	4.13	4.31	4.14	-0.172	34%	51%	11%	2%	2%
People focus on one task at a time and avoid distractions	3.52	3.98	3.66	-0.459	17%	40%	26%	13%	4%

Overall Average Response Scores by Statement

Overall Culture	2023	2022	2021	Change 2022-2023	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
People in my workgroup treat each other with respect	4.36	4.26	4.36	0.096	50%	40%	7%	2%	2%
Managers treat workers with respect	4.25	4.24	4.18	0.007	44%	42%	10%	2%	2%
My supervisor would use whatever power they have to help me out	4.31	4.32	4.33	-0.014	50%	36%	10%	3%	2%
The company cares about my opinions	3.79	3.81	3.65	-0.018	24%	44%	24%	6%	3%
Leaders encourage people to ask questions	4.31	4.34	4.24	-0.024	48%	40%	8%	2%	1%
Information about important events and lessons learned is shared within my workgroup	4.30	4.34	4.15	-0.034	46%	44%	7%	3%	1%
I believe managers apply the same rules for all workers	3.92	3.97	3.79	-0.044	33%	42%	14%	7%	4%
My supervisor makes sure all employee concerns are heard before job decisions are made	4.14	4.20	4.04	-0.055	39%	43%	13%	4%	2%
People listen to one another: it is rare that someone's views go unheard	3.96	4.08	3.96	-0.113	29%	48%	17%	5%	2%
People report mistakes they make, even if others do not notice them	3.73	3.93	3.72	-0.201	19%	44%	30%	5%	2%

Energy Safety Workforce Survey 2023: Demographic Comparisons

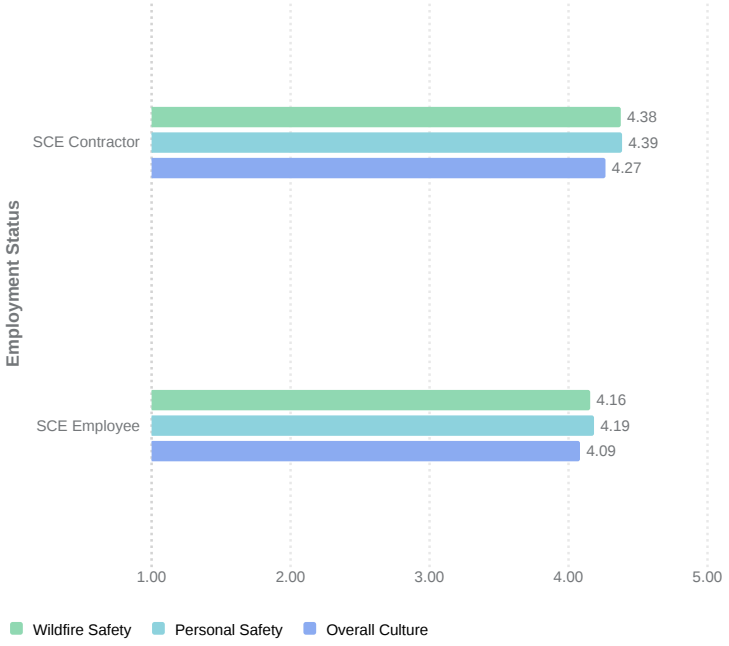
Survey respondents were asked to provide demographic information at the conclusion of the **Energy Safety Workforce Survey**. These responses were used to conduct analyses and provide these subgroup comparisons.

Comparisons were not computed for groups with fewer than five respondents.

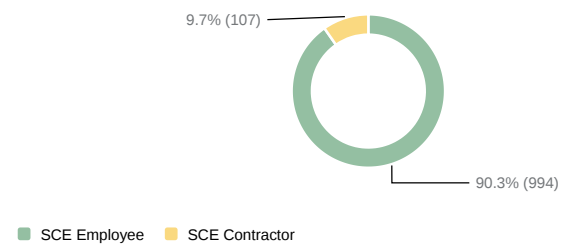
Average Response Score Metrics: Low: < 3.30, Medium: 3.30 - 3.65, Moderately High: 3.65 - 4.10, High: 4.10 +

1. Comparison by Employment Status

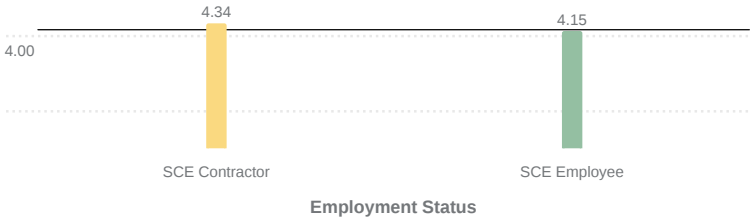
Average Response Scores by Statement Category



Number of Responses 1,101



Overall Average Response Score



Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement

Wildfire Safety	SCE Contractor	SCE Employee
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.75	3.42
I feel comfortable discussing wildfire hazards with my supervisor	4.51	4.43
Leaders actively seek out signs of potential wildfire hazards	4.31	4.05
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.48	4.32
Our management acts quickly to address wildfire hazards	4.51	4.21
People in my workgroup report all wildfire hazards, no matter how minor	4.37	4.09
People look for wildfire hazards and risks as work progresses	4.40	4.08
Protecting the community from wildfire hazards is clearly a high priority with management	4.59	4.51
Wildfire and personal safety concerns are communicated openly	4.50	4.32

Average Response Scores by Statement

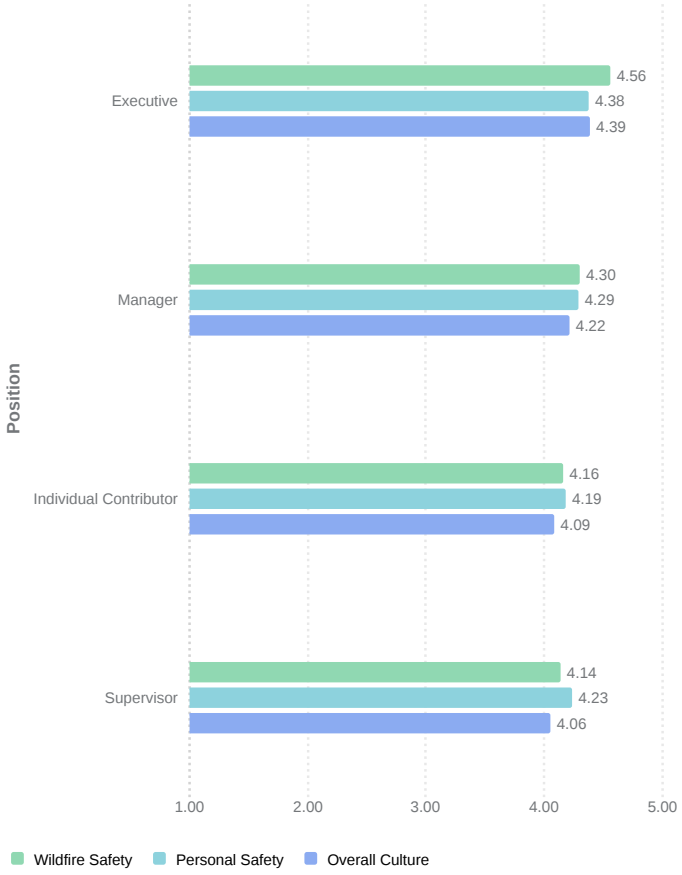
Personal Safety	SCE Contractor	SCE Employee
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.45	4.24
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.34	4.24
I take responsibility for the safety of myself and others in my work area	4.68	4.65
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.43	4.44
Leaders keep people prepared to intervene when an emergency occurs	4.33	4.17
Leaders use mistakes and incidents as learning opportunities	4.48	4.22
Pausing work for hazards and safety concerns is viewed positively	4.54	4.41
People focus on one task at a time and avoid distractions	4.07	3.47
People have the ability to respond to and correct problems and errors before they get out of control	4.39	4.11
People have the skills they need to resolve workplace safety issues	4.29	4.16
We have the right tools for the job	4.27	3.97

Average Response Scores by Statement

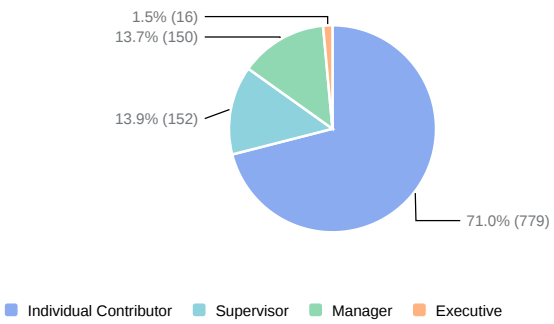
Overall Culture	SCE Contractor	SCE Employee
I believe managers apply the same rules for all workers	4.23	3.89
Information about important events and lessons learned is shared within my workgroup	4.45	4.29
Leaders encourage people to ask questions	4.45	4.30
Managers treat workers with respect	4.35	4.23
My supervisor makes sure all employee concerns are heard before job decisions are made	4.25	4.13
My supervisor would use whatever power they have to help me out	4.43	4.29
People in my workgroup treat each other with respect	4.39	4.36
People listen to one another: it is rare that someone's views go unheard	4.12	3.94
People report mistakes they make, even if others do not notice them	3.89	3.71
The company cares about my opinions	4.10	3.75

2. Comparison by Position

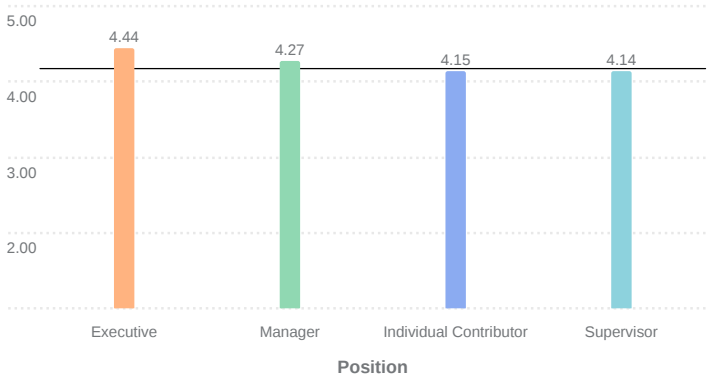
Average Response Scores by Statement Category



Number of Responses 1,097



Overall Average Response Score



Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement

Wildfire Safety	Executive	Individual Contributor	Manager	Supervisor
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	4.00	3.40	3.66	3.44
I feel comfortable discussing wildfire hazards with my supervisor	4.81	4.43	4.53	4.33
Leaders actively seek out signs of potential wildfire hazards	4.56	4.07	4.17	3.99
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.44	4.32	4.41	4.34
Our management acts quickly to address wildfire hazards	4.75	4.23	4.35	4.16
People in my workgroup report all wildfire hazards, no matter how minor	4.63	4.10	4.22	4.11
People look for wildfire hazards and risks as work progresses	4.38	4.11	4.16	4.08
Protecting the community from wildfire hazards is clearly a high priority with management	4.81	4.48	4.73	4.49
Wildfire and personal safety concerns are communicated openly	4.69	4.32	4.43	4.28

Average Response Scores by Statement

Personal Safety	Executive	Individual Contributor	Manager	Supervisor
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.63	4.24	4.40	4.22
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.38	4.21	4.43	4.31
I take responsibility for the safety of myself and others in my work area	4.88	4.62	4.80	4.68
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.88	4.40	4.62	4.41
Leaders keep people prepared to intervene when an emergency occurs	4.38	4.16	4.26	4.18
Leaders use mistakes and incidents as learning opportunities	4.38	4.23	4.38	4.20
Pausing work for hazards and safety concerns is viewed positively	4.69	4.41	4.52	4.41
People focus on one task at a time and avoid distractions	3.38	3.54	3.27	3.72
People have the ability to respond to and correct problems and errors before they get out of control	4.31	4.11	4.22	4.16
People have the skills they need to resolve workplace safety issues	4.31	4.16	4.30	4.16
We have the right tools for the job	3.94	3.97	4.06	4.10

Average Response Scores by Statement

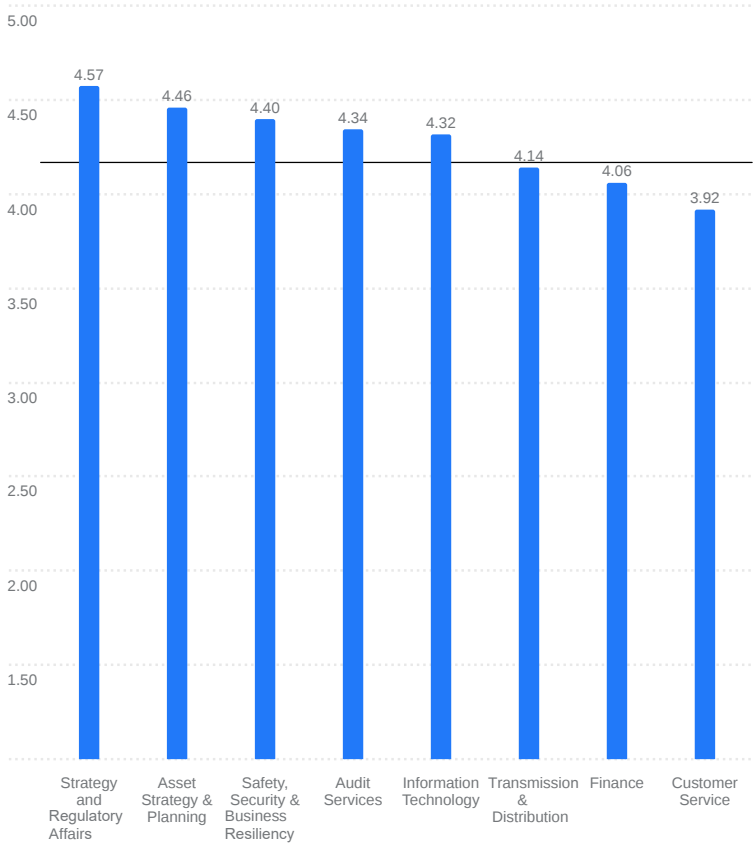
Overall Culture	Executive	Individual Contributor	Manager	Supervisor
I believe managers apply the same rules for all workers	4.25	3.91	4.01	3.85
Information about important events and lessons learned is shared within my workgroup	4.56	4.29	4.36	4.30
Leaders encourage people to ask questions	4.69	4.29	4.45	4.25
Managers treat workers with respect	4.50	4.21	4.46	4.18
My supervisor makes sure all employee concerns are heard before job decisions are made	4.63	4.12	4.25	4.07
My supervisor would use whatever power they have to help me out	4.50	4.29	4.35	4.30
People in my workgroup treat each other with respect	4.63	4.34	4.52	4.26
People listen to one another: it is rare that someone's views go unheard	4.00	3.96	4.02	3.93
People report mistakes they make, even if others do not notice them	3.94	3.73	3.83	3.62
The company cares about my opinions	4.25	3.75	3.93	3.79

3. Comparison by Business Unit

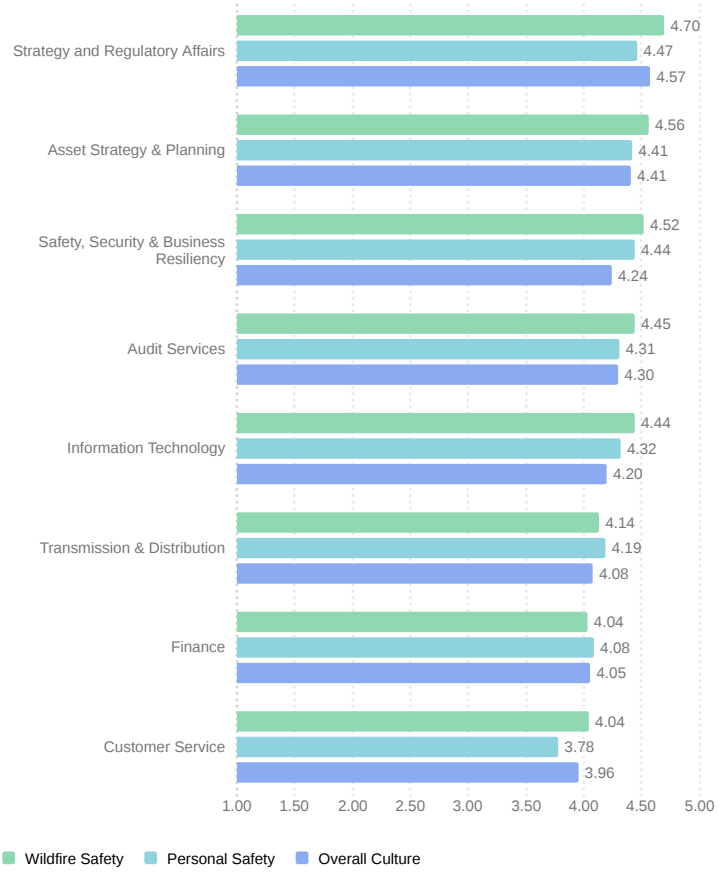
Number of Responses 1,091

Business Unit	Count ▼	Percent
Transmission & Distribution	942	86%
Asset Strategy & Planning	68	6%
Audit Services	24	2%
Safety, Security & Business Resiliency	20	2%
Finance	12	1%
Information Technology	8	1%
Strategy and Regulatory Affairs	7	1%
Customer Service	5	0%
Corporate Affairs	3	0%
Generation	2	0%

Overall Average Response Score



Average Response Scores by Statement Category



Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement

Wildfire Safety	Asset Strategy & Planning	Audit Services	Customer Service	Finance	Information Technology	Safety, Security & Business Resiliency	Strategy and Regulatory Affairs	Transmission & Distribution
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	4.10	3.75	3.60	3.33	3.50	3.89	4.00	3.38
I feel comfortable discussing wildfire hazards with my supervisor	4.76	4.71	4.20	4.17	4.63	4.75	4.86	4.40
Leaders actively seek out signs of potential wildfire hazards	4.57	4.42	3.80	4.00	4.38	4.35	4.71	4.02
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.56	4.54	4.20	4.08	4.63	4.55	4.57	4.31
Our management acts quickly to address wildfire hazards	4.67	4.46	4.20	4.17	4.63	4.60	4.71	4.19
People in my workgroup report all wildfire hazards, no matter how minor	4.53	4.42	3.80	3.83	4.50	4.55	4.57	4.08
People look for wildfire hazards and risks as work progresses	4.47	4.48	3.80	3.92	4.63	4.60	5.00	4.06
Protecting the community from wildfire hazards is clearly a high priority with management	4.79	4.67	4.60	4.50	4.63	4.75	5.00	4.49
Wildfire and personal safety concerns are communicated openly	4.62	4.58	4.20	4.33	4.50	4.60	4.86	4.30

Average Response Scores by Statement

Personal Safety	Asset Strategy & Planning	Audit Services	Customer Service	Finance	Information Technology	Safety, Security & Business Resiliency	Strategy and Regulatory Affairs	Transmission & Distribution
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.54	4.29	3.80	4.25	4.38	4.45	4.86	4.24
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.34	4.13	-	4.08	4.50	4.55	4.00	4.25
I take responsibility for the safety of myself and others in my work area	4.76	4.67	4.40	4.42	4.63	4.90	4.86	4.65
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.71	4.58	4.20	4.33	4.38	4.55	4.86	4.41
Leaders keep people prepared to intervene when an emergency occurs	4.50	4.13	3.80	4.00	4.38	4.45	4.71	4.15
Leaders use mistakes and incidents as learning opportunities	4.46	4.46	4.00	4.17	4.13	4.45	4.43	4.23
Pausing work for hazards and safety concerns is viewed positively	4.65	4.63	4.40	4.42	4.50	4.60	4.71	4.40
People focus on one task at a time and avoid distractions	3.55	3.79	2.80	3.33	3.63	3.80	3.43	3.52
People have the ability to respond to and correct problems and errors before they get out of control	4.32	4.25	3.60	4.25	4.38	4.40	4.29	4.11
People have the skills they need to resolve workplace safety issues	4.43	4.17	3.80	4.08	4.25	4.40	4.57	4.15
We have the right tools for the job	4.28	4.29	3.00	3.58	4.38	4.30	4.43	3.96

Comparisons by business unit and response category continued on the next page.

Comparisons were not computed for groups with fewer than five respondents.

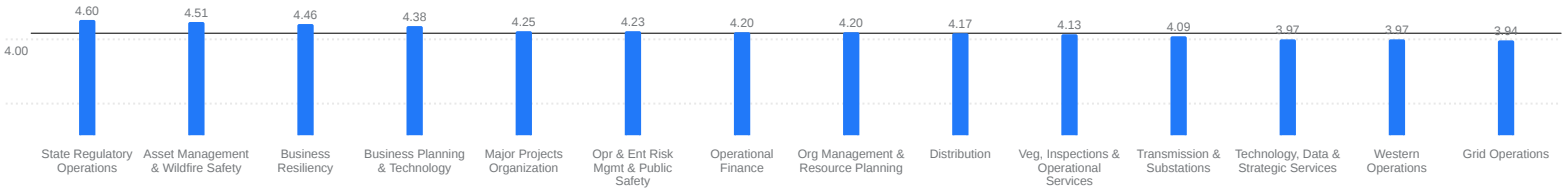
Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement

Overall Culture	Asset Strategy & Planning	Audit Services	Customer Service	Finance	Information Technology	Safety, Security & Business Resiliency	Strategy and Regulatory Affairs	Transmission & Distribution
I believe managers apply the same rules for all workers	4.29	4.21	3.80	3.92	4.13	4.15	4.86	3.88
Information about important events and lessons learned is shared within my workgroup	4.47	4.38	4.00	4.17	4.38	4.30	4.71	4.30
Leaders encourage people to ask questions	4.60	4.50	3.80	4.25	4.38	4.15	4.43	4.30
Managers treat workers with respect	4.59	4.38	4.00	4.33	4.25	4.10	4.71	4.22
My supervisor makes sure all employee concerns are heard before job decisions are made	4.40	4.25	4.00	3.92	4.38	4.30	4.57	4.12
My supervisor would use whatever power they have to help me out	4.56	4.46	4.60	3.83	4.25	4.63	5.00	4.29
People in my workgroup treat each other with respect	4.75	4.54	4.40	4.42	4.38	4.45	4.86	4.32
People listen to one another: it is rare that someone's views go unheard	4.31	4.13	3.60	3.92	4.00	4.05	4.14	3.93
People report mistakes they make, even if others do not notice them	4.06	3.92	4.00	4.08	3.88	4.15	4.00	3.68
The company cares about my opinions	4.09	4.21	3.40	3.67	4.00	4.11	4.43	3.75

4. Comparison by Operating Unit

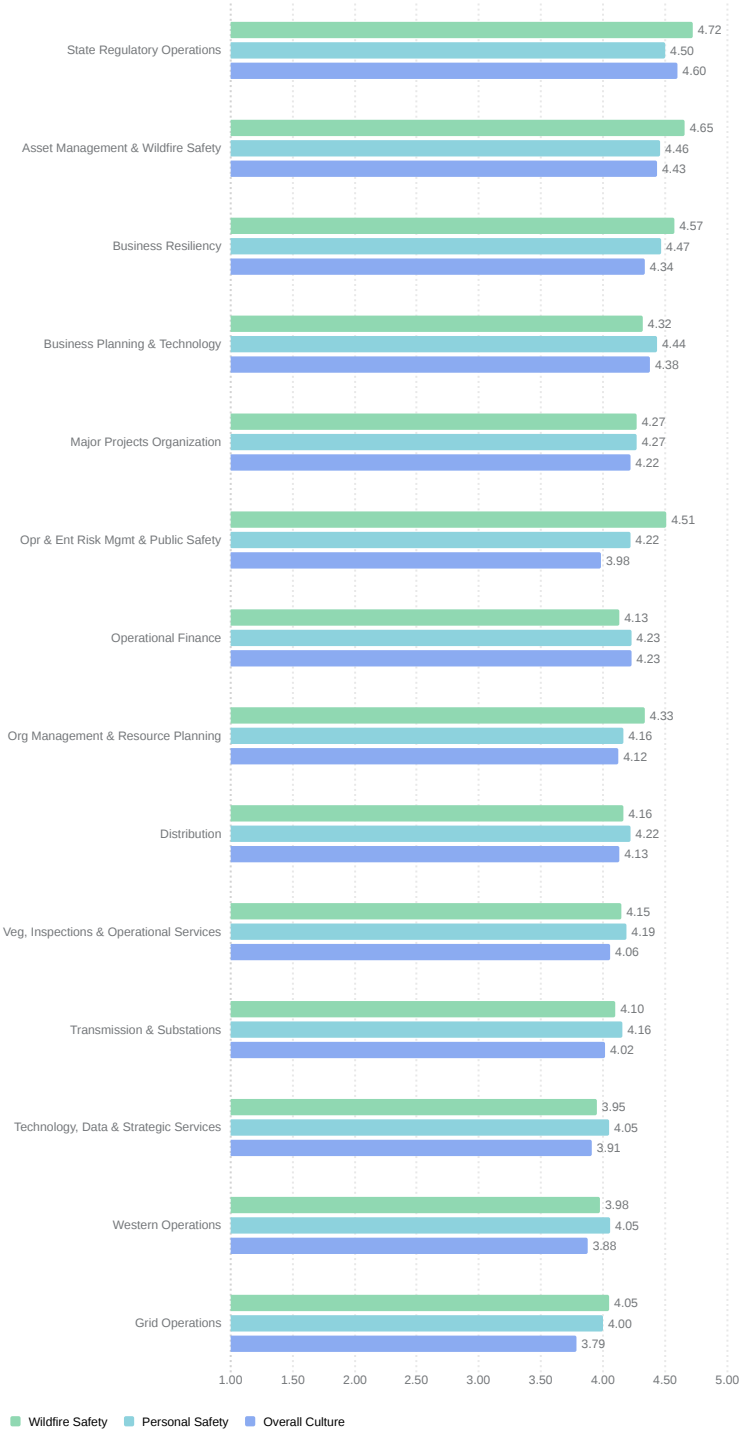
Overall Average Response Score



Number of Responses

SCE Location	Count
Distribution	483
Veg, Inspections & Operational Services	246
Transmission & Substations	121
Asset Management & Wildfire Safety	55
Grid Operations	42
Major Projects Organization	27
Business Resiliency	18
Technology, Data & Strategic Services	9
Business Planning & Technology	9
State Regulatory Operations	6
Operational Finance	6
Western Operations	5
Org Management & Resource Planning	5
Opr & Ent Risk Mgmt & Public Safety	5
Controllers	4
Oper, Envir, Sfty, Security & IT Audits	3
Customer Programs & Services	3
Customer Engagement Division	3
Local Public Affairs	2
Financial & Corporate Audits	2
EE & Contractor Safety	2
Eastern Operations	2
Customer Service Operations Division	2
Corporate Communications & Philanthropy	2
Enterprise Transformation Services	1
Digital Grid Services	1
Asset Mgt & Generation Strategy	1

Average Response Scores by Safety Components



Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement:

Wildfire Safety	Asset Management & Wildfire Safety	Business Planning & Technology	Business Resiliency	Distribution	Grid Operations	Major Projects Organization	Operational Finance
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	4.22	3.78	4.00	3.43	3.10	3.56	3.33
I feel comfortable discussing wildfire hazards with my supervisor	4.85	4.56	4.72	4.40	4.40	4.56	4.50
Leaders actively seek out signs of potential wildfire hazards	4.65	4.44	4.50	4.05	3.95	4.41	4.00
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.64	4.33	4.56	4.34	4.40	4.30	4.00
Our management acts quickly to address wildfire hazards	4.76	4.33	4.72	4.22	4.05	4.22	4.17
People in my workgroup report all wildfire hazards, no matter how minor	4.64	4.00	4.61	4.12	4.00	3.96	4.00
People look for wildfire hazards and risks as work progresses	4.58	4.33	4.56	4.09	3.83	4.26	4.17
Protecting the community from wildfire hazards is clearly a high priority with management	4.85	4.67	4.83	4.48	4.52	4.81	4.67
Wildfire and personal safety concerns are communicated openly	4.69	4.44	4.61	4.33	4.17	4.37	4.33

Comparisons by operating unit and response category continued on the next page.

Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement

Personal Safety	Asset Management & Wildfire Safety	Business Planning & Technology	Business Resiliency	Distribution	Grid Operations	Major Projects Organization	Operational Finance
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.65	3.89	4.50	4.26	3.88	4.52	4.50
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.39	4.56	4.61	4.27	4.36	4.30	4.33
I take responsibility for the safety of myself and others in my work area	4.85	4.56	4.89	4.63	4.43	4.68	4.67
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.75	4.67	4.67	4.42	4.36	4.52	4.50
Leaders keep people prepared to intervene when an emergency occurs	4.51	4.67	4.50	4.20	3.83	4.33	4.00
Leaders use mistakes and incidents as learning opportunities	4.47	4.56	4.44	4.28	3.83	4.44	4.33
Pausing work for hazards and safety concerns is viewed positively	4.69	4.67	4.67	4.42	4.29	4.30	4.50
People focus on one task at a time and avoid distractions	3.53	4.13	3.78	3.61	3.38	3.37	3.50
People have the ability to respond to and correct problems and errors before they get out of control	4.38	4.33	4.33	4.15	3.95	4.19	4.50
People have the skills they need to resolve workplace safety issues	4.53	4.33	4.44	4.19	3.95	4.31	4.00
We have the right tools for the job	4.33	4.44	4.33	4.00	3.71	4.04	3.67

Comparisons by operating unit and response category continued on the next page.

Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement:

Overall Culture	Asset Management & Wildfire Safety	Business Planning & Technology	Business Resiliency	Distribution	Grid Operations	Major Projects Organization	Operational Finance
I believe managers apply the same rules for all workers	4.27	4.44	4.17	3.98	3.57	3.85	4.17
Information about important events and lessons learned is shared within my workgroup	4.53	4.22	4.39	4.33	3.90	4.48	4.33
Leaders encourage people to ask questions	4.60	4.78	4.28	4.35	4.02	4.30	4.50
Managers treat workers with respect	4.62	4.67	4.17	4.25	4.05	4.46	4.50
My supervisor makes sure all employee concerns are heard before job decisions are made	4.40	4.56	4.39	4.16	3.74	4.22	4.17
My supervisor would use whatever power they have to help me out	4.56	4.56	4.71	4.32	3.90	4.48	3.83
People in my workgroup treat each other with respect	4.80	4.56	4.56	4.36	4.07	4.52	4.50
People listen to one another: it is rare that someone's views go unheard	4.33	4.11	4.22	3.99	3.67	4.12	4.17
People report mistakes they make, even if others do not notice them	4.11	4.00	4.22	3.77	3.48	3.78	4.17
The company cares about my opinions	4.11	3.89	4.29	3.77	3.45	4.00	4.00

Comparisons by operating unit and response category continued on the next page.

Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement:

Wildfire Safety	Opr & Ent Risk Mgmt & Public Safety	Org Management & Resource Planning	State Regulatory Operations	Technology, Data & Strategic Services	Transmission & Substations	Veg, Inspections & Operational Services	Western Operations
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.80	3.40	4.17	2.78	3.23	3.43	3.00
I feel comfortable discussing wildfire hazards with my supervisor	5.00	4.20	4.83	4.00	4.45	4.40	4.40
Leaders actively seek out signs of potential wildfire hazards	4.20	4.60	4.83	4.00	3.88	4.04	4.00
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.60	4.60	4.50	4.22	4.34	4.26	4.20
Our management acts quickly to address wildfire hazards	4.60	4.60	4.83	4.00	4.04	4.24	4.20
People in my workgroup report all wildfire hazards, no matter how minor	4.60	4.40	4.50	4.00	4.08	4.09	3.60
People look for wildfire hazards and risks as work progresses	4.40	4.00	5.00	4.00	4.02	4.10	4.00
Protecting the community from wildfire hazards is clearly a high priority with management	4.60	5.00	5.00	4.22	4.47	4.47	4.40
Wildfire and personal safety concerns are communicated openly	4.80	4.20	4.83	4.38	4.31	4.30	4.00

Comparisons by operating unit and response category continued on the next page.

Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement

Personal Safety	Opr & Ent Risk Mgmt & Public Safety	Org Management & Resource Planning	State Regulatory Operations	Technology, Data & Strategic Services	Transmission & Substations	Veg, Inspections & Operational Services	Western Operations
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.00	4.00	4.83	4.22	4.30	4.26	3.80
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.00	3.80	3.83	4.11	4.29	4.19	4.20
I take responsibility for the safety of myself and others in my work area	4.60	4.80	5.00	4.44	4.73	4.67	4.60
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.20	4.40	4.83	4.11	4.40	4.43	4.20
Leaders keep people prepared to intervene when an emergency occurs	4.20	4.20	4.83	3.89	4.13	4.10	4.20
Leaders use mistakes and incidents as learning opportunities	4.00	4.60	4.50	3.78	4.13	4.25	3.60
Pausing work for hazards and safety concerns is viewed positively	4.60	4.60	4.67	4.33	4.40	4.40	4.00
People focus on one task at a time and avoid distractions	3.60	3.60	3.50	3.78	3.32	3.50	4.00
People have the ability to respond to and correct problems and errors before they get out of control	4.40	4.00	4.33	4.00	4.11	4.08	4.00
People have the skills they need to resolve workplace safety issues	4.60	4.00	4.67	4.00	4.10	4.13	4.20
We have the right tools for the job	4.20	3.80	4.50	3.89	3.83	4.02	3.80

Comparisons by operating unit and response category continued on the next page.

Comparisons were not computed for groups with fewer than five respondents.

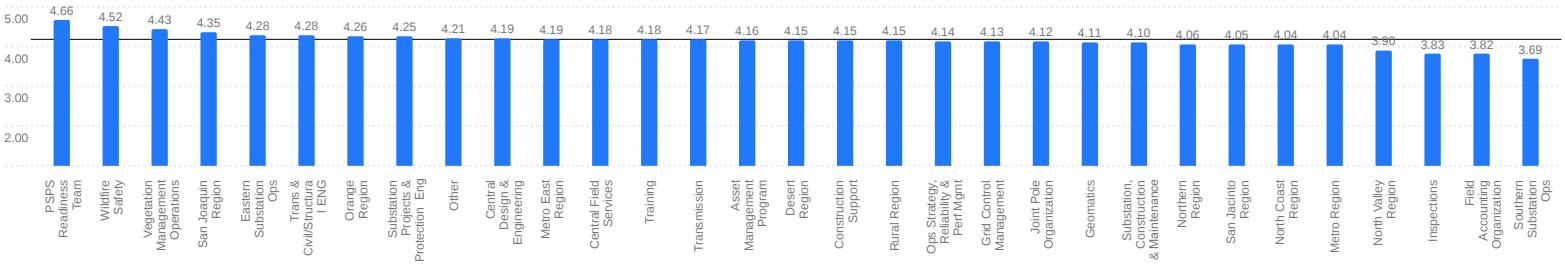
Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement:

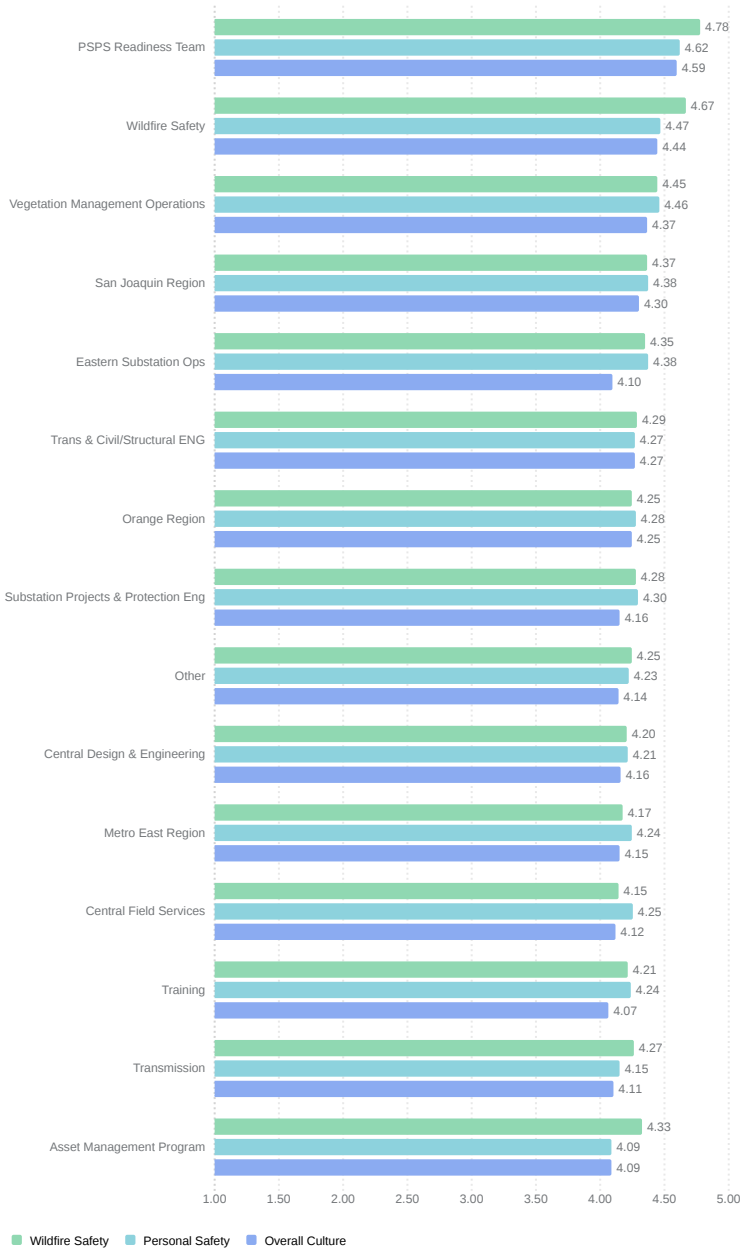
Overall Culture	Opr & Ent Risk Mgmt & Public Safety	Org Management & Resource Planning	State Regulatory Operations	Technology, Data & Strategic Services	Transmission & Substations	Veg, Inspections & Operational Services	Western Operations
I believe managers apply the same rules for all workers	4.20	3.80	5.00	3.78	3.71	3.84	3.40
Information about important events and lessons learned is shared within my workgroup	4.40	4.40	4.67	4.00	4.29	4.30	3.80
Leaders encourage people to ask questions	4.00	4.40	4.50	3.89	4.29	4.30	4.00
Managers treat workers with respect	3.60	4.20	4.83	4.11	4.12	4.21	4.20
My supervisor makes sure all employee concerns are heard before job decisions are made	3.80	4.20	4.50	3.78	4.23	4.04	4.00
My supervisor would use whatever power they have to help me out	4.20	4.20	5.00	3.89	4.25	4.30	4.40
People in my workgroup treat each other with respect	4.40	4.40	4.83	4.22	4.34	4.28	4.20
People listen to one another: it is rare that someone's views go unheard	3.40	4.00	4.17	4.00	3.88	3.88	3.60
People report mistakes they make, even if others do not notice them	3.80	3.80	4.00	3.78	3.53	3.62	3.60
The company cares about my opinions	4.00	3.80	4.50	3.67	3.55	3.83	3.60

5. Comparison by Location

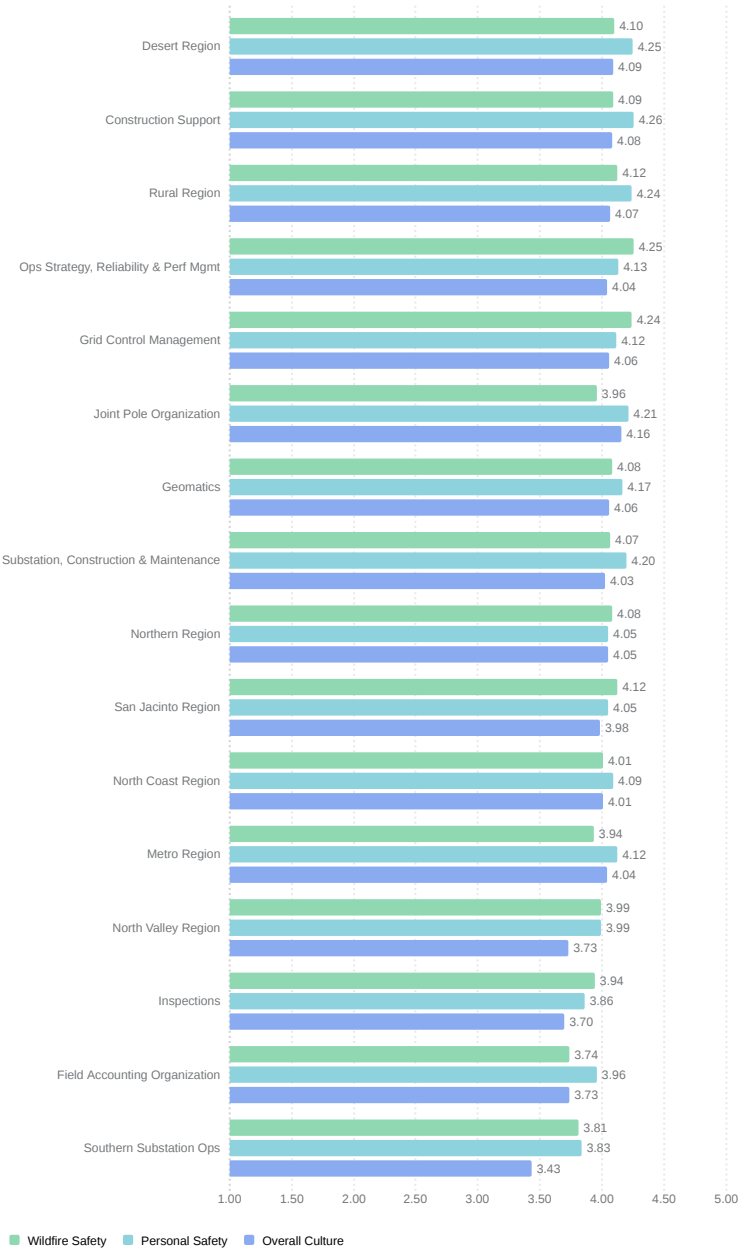
Overall Average Response Score



Average Response Scores by Safety Components



Average Response Scores by Safety Components



4. Comparison by Location (continued)

Number of Responses

Q34 - Location	Count ▼
Other	145
Central Design & Engineering	80
San Joaquin Region	60
Vegetation Management Operations	58
North Coast Region	57
Field Accounting Organization	54
Orange Region	52
Metro East Region	45
Desert Region	45
San Jacinto Region	42
Central Field Services	41
Metro Region	40
Rural Region	35
Geomatics	34
Transmission	33
Substation, Construction & Maintenance	33
Wildfire Safety	32
Trans & Civil/Structural ENG	30
Inspections	28
PSPS Readiness Team	18
North Valley Region	16
Asset Management Program	16
Substation Projects & Protection Eng	13
Training	12
Joint Pole Organization	9
Northern Region	8
Ops Strategy, Reliability & Perf Mgmt	7
Grid Control Management	7
Southern Substation Ops	6
Eastern Substation Ops	6
Construction Support	6
Northern Substation Ops	4
Construction & Technical Support	4
Substation Ops	3
Data & Information Governance	3
T&S Strategic & Operational Services	2
Western Substation Ops	1
Metering Field Ops	1
Grid Contracts Origination & Operations	1

Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement

Wildfire Safety	Asset Management Program	Central Design & Engineering	Central Field Services	Construction Support	Desert Region
Wildfire and personal safety concerns are communicated openly	4.38	4.46	4.22	4.17	4.18
Protecting the community from wildfire hazards is clearly a high priority with management	4.63	4.59	4.46	4.67	4.40
People look for wildfire hazards and risks as work progresses	4.31	4.09	3.98	4.17	4.07
People in my workgroup report all wildfire hazards, no matter how minor	4.38	4.09	4.07	4.00	4.09
Our management acts quickly to address wildfire hazards	4.31	4.35	4.23	4.17	4.05
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.31	4.34	4.29	4.00	4.40
Leaders actively seek out signs of potential wildfire hazards	4.13	4.05	4.05	3.83	3.93
I feel comfortable discussing wildfire hazards with my supervisor	4.50	4.46	4.51	4.50	4.48
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	4.00	3.39	3.51	3.33	3.32

Average Response Scores by Statement

Personal Safety	Asset Management Program	Central Design & Engineering	Central Field Services	Construction Support	Desert Region
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.25	4.36	4.27	4.33	4.16
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.00	4.32	4.22	4.50	4.33
I take responsibility for the safety of myself and others in my work area	4.56	4.67	4.71	4.83	4.69
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.25	4.53	4.44	4.67	4.57
Leaders keep people prepared to intervene when an emergency occurs	4.19	4.14	4.27	4.00	4.24
Leaders use mistakes and incidents as learning opportunities	4.13	4.36	4.27	4.17	4.29
Pausing work for hazards and safety concerns is viewed positively	4.38	4.49	4.44	4.67	4.50
People focus on one task at a time and avoid distractions	3.19	3.44	3.56	3.33	3.50
People have the ability to respond to and correct problems and errors before they get out of control	4.13	4.10	4.20	4.50	4.23
People have the skills they need to resolve workplace safety issues	4.00	4.10	4.24	4.00	4.16
We have the right tools for the job	3.94	3.85	4.20	3.83	4.04

Average Response Scores by Statement

Overall Culture	Asset Management Program	Central Design & Engineering	Central Field Services	Construction Support	Desert Region
The company cares about my opinions	3.69	3.70	4.02	3.83	3.77
People report mistakes they make, even if others do not notice them	3.69	3.81	3.63	3.50	3.80
People listen to one another: it is rare that someone's views go unheard	3.94	3.96	3.80	3.83	4.05
People in my workgroup treat each other with respect	4.56	4.44	4.37	4.00	4.36
My supervisor would use whatever power they have to help me out	4.19	4.38	4.44	4.17	4.34
My supervisor makes sure all employee concerns are heard before job decisions are made	4.13	4.13	4.27	4.17	4.25
Managers treat workers with respect	4.25	4.34	4.17	4.17	4.07
Leaders encourage people to ask questions	4.31	4.51	4.34	4.67	4.20
Information about important events and lessons learned is shared within my workgroup	4.25	4.34	4.35	4.33	4.40
I believe managers apply the same rules for all workers	3.88	4.05	3.80	4.17	3.70

Comparisons by location and response category continued on the next page.

Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement

Wildfire Safety	Eastern Substation Ops	Field Accounting Organization	Geomatics	Grid Control Management	Inspections
Wildfire and personal safety concerns are communicated openly	4.33	3.94	4.42	4.29	4.11
Protecting the community from wildfire hazards is clearly a high priority with management	4.67	4.09	4.50	4.57	4.43
People look for wildfire hazards and risks as work progresses	4.50	3.72	3.97	4.00	4.04
People in my workgroup report all wildfire hazards, no matter how minor	4.17	3.68	3.97	4.43	3.89
Our management acts quickly to address wildfire hazards	4.33	3.81	4.12	4.29	4.00
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.67	4.00	4.15	4.57	4.14
Leaders actively seek out signs of potential wildfire hazards	4.00	3.65	4.09	4.00	3.79
I feel comfortable discussing wildfire hazards with my supervisor	4.83	3.94	4.29	4.57	4.04
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.67	2.79	3.24	3.43	3.07

Average Response Scores by Statement

Personal Safety	Eastern Substation Ops	Field Accounting Organization	Geomatics	Grid Control Management	Inspections
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.50	4.11	4.21	3.71	3.93
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	5.00	4.19	4.21	4.57	3.93
I take responsibility for the safety of myself and others in my work area	4.83	4.57	4.74	4.57	4.46
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.50	4.15	4.38	4.43	4.18
Leaders keep people prepared to intervene when an emergency occurs	4.00	3.81	4.09	4.29	3.82
Leaders use mistakes and incidents as learning opportunities	4.00	3.85	4.21	3.86	3.86
Pausing work for hazards and safety concerns is viewed positively	4.33	4.15	4.35	4.29	4.11
People focus on one task at a time and avoid distractions	3.83	3.34	3.59	3.14	3.18
People have the ability to respond to and correct problems and errors before they get out of control	4.17	3.78	4.03	4.14	3.64
People have the skills they need to resolve workplace safety issues	4.50	3.80	4.12	4.29	3.89
We have the right tools for the job	4.50	3.80	3.94	4.00	3.43

Average Response Scores by Statement

Overall Culture	Eastern Substation Ops	Field Accounting Organization	Geomatics	Grid Control Management	Inspections
The company cares about my opinions	3.17	3.57	3.79	3.86	3.32
People report mistakes they make, even if others do not notice them	4.00	3.37	3.68	3.86	3.46
People listen to one another: it is rare that someone's views go unheard	4.17	3.57	3.88	4.00	3.57
People in my workgroup treat each other with respect	4.50	3.91	4.38	4.29	3.96
My supervisor would use whatever power they have to help me out	4.67	4.08	4.38	4.29	3.82
My supervisor makes sure all employee concerns are heard before job decisions are made	4.33	3.78	3.91	3.86	3.48
Managers treat workers with respect	4.17	3.91	4.32	4.14	4.00
Leaders encourage people to ask questions	4.33	4.04	4.26	4.29	3.82
Information about important events and lessons learned is shared within my workgroup	4.00	3.85	4.26	3.86	3.93
I believe managers apply the same rules for all workers	3.67	3.28	3.71	4.14	3.57

Comparisons by location and response category continued on the next page.

Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement

Wildfire Safety	Joint Pole Organization	Metro East Region	Metro Region	North Coast Region	North Valley Region
Wildfire and personal safety concerns are communicated openly	4.22	4.22	3.95	4.13	3.94
Protecting the community from wildfire hazards is clearly a high priority with management	4.33	4.49	4.15	4.26	4.44
People look for wildfire hazards and risks as work progresses	3.78	4.04	3.85	3.95	4.13
People in my workgroup report all wildfire hazards, no matter how minor	4.00	4.13	3.95	3.93	4.19
Our management acts quickly to address wildfire hazards	3.89	4.33	4.08	3.95	4.13
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.11	4.44	4.18	4.23	4.00
Leaders actively seek out signs of potential wildfire hazards	3.78	4.09	3.78	3.86	3.81
I feel comfortable discussing wildfire hazards with my supervisor	4.11	4.33	4.18	4.37	4.13
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.44	3.47	3.31	3.40	3.19

Average Response Scores by Statement

Personal Safety	Joint Pole Organization	Metro East Region	Metro Region	North Coast Region	North Valley Region
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.44	4.36	4.03	3.96	3.88
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	3.89	4.42	4.13	4.07	4.19
I take responsibility for the safety of myself and others in my work area	4.78	4.61	4.51	4.60	4.56
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.44	4.29	4.23	4.37	4.31
Leaders keep people prepared to intervene when an emergency occurs	4.11	4.13	4.13	4.02	3.87
Leaders use mistakes and incidents as learning opportunities	4.33	4.31	4.18	4.02	4.13
Pausing work for hazards and safety concerns is viewed positively	4.44	4.36	4.28	4.26	4.13
People focus on one task at a time and avoid distractions	3.67	3.58	3.60	3.60	3.13
People have the ability to respond to and correct problems and errors before they get out of control	3.89	4.23	4.08	4.07	4.06
People have the skills they need to resolve workplace safety issues	4.11	4.22	4.18	4.12	3.80
We have the right tools for the job	4.22	4.18	4.05	3.95	3.81

Average Response Scores by Statement

Overall Culture	Joint Pole Organization	Metro East Region	Metro Region	North Coast Region	North Valley Region
The company cares about my opinions	4.00	3.87	3.85	3.56	3.31
People report mistakes they make, even if others do not notice them	4.00	3.84	3.68	3.56	3.44
People listen to one another: it is rare that someone's views go unheard	4.00	4.00	3.98	3.98	3.56
People in my workgroup treat each other with respect	4.56	4.36	4.15	4.33	3.73
My supervisor would use whatever power they have to help me out	4.00	4.33	4.18	4.23	4.31
My supervisor makes sure all employee concerns are heard before job decisions are made	3.78	4.20	4.05	4.12	3.69
Managers treat workers with respect	4.11	4.24	4.23	4.12	3.88
Leaders encourage people to ask questions	4.56	4.31	4.30	4.12	4.00
Information about important events and lessons learned is shared within my workgroup	4.44	4.34	4.13	4.23	3.94
I believe managers apply the same rules for all workers	4.11	4.00	3.85	3.79	3.44

Comparisons by location and response category continued on the next page.

Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement

Wildfire Safety	Northern Region	Ops Strategy, Reliability & Perf Mgmt	Orange Region	Other	PSPS Readiness Team
Wildfire and personal safety concerns are communicated openly	4.63	4.29	4.45	4.45	4.89
Protecting the community from wildfire hazards is clearly a high priority with management	4.50	4.57	4.62	4.61	4.89
People look for wildfire hazards and risks as work progresses	3.75	4.14	4.04	4.16	4.78
People in my workgroup report all wildfire hazards, no matter how minor	4.13	4.14	4.04	4.17	4.83
Our management acts quickly to address wildfire hazards	4.00	4.29	4.35	4.40	4.83
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.50	4.43	4.46	4.25	4.83
Leaders actively seek out signs of potential wildfire hazards	3.63	4.14	4.10	4.25	4.72
I feel comfortable discussing wildfire hazards with my supervisor	4.63	4.57	4.63	4.41	4.94
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.00	3.71	3.52	3.56	4.28

Average Response Scores by Statement

Personal Safety	Northern Region	Ops Strategy, Reliability & Perf Mgmt	Orange Region	Other	PSPS Readiness Team
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.13	4.29	4.16	4.31	4.61
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.00	4.29	4.38	4.25	4.61
I take responsibility for the safety of myself and others in my work area	4.13	4.29	4.63	4.64	4.89
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.50	4.57	4.52	4.45	4.94
Leaders keep people prepared to intervene when an emergency occurs	4.00	4.14	4.31	4.24	4.61
Leaders use mistakes and incidents as learning opportunities	4.13	4.29	4.33	4.32	4.56
Pausing work for hazards and safety concerns is viewed positively	4.63	4.57	4.44	4.49	4.83
People focus on one task at a time and avoid distractions	3.38	3.14	3.67	3.46	3.83
People have the ability to respond to and correct problems and errors before they get out of control	4.13	3.86	4.21	4.15	4.50
People have the skills they need to resolve workplace safety issues	3.88	4.29	4.31	4.24	4.78
We have the right tools for the job	3.63	3.71	4.10	3.97	4.67

Average Response Scores by Statement

Overall Culture	Northern Region	Ops Strategy, Reliability & Perf Mgmt	Orange Region	Other	PSPS Readiness Team
The company cares about my opinions	3.38	4.00	3.96	3.95	4.33
People report mistakes they make, even if others do not notice them	3.00	3.86	3.79	3.78	4.44
People listen to one another: it is rare that someone's views go unheard	3.50	3.86	4.08	3.99	4.44
People in my workgroup treat each other with respect	4.75	4.29	4.43	4.39	4.83
My supervisor would use whatever power they have to help me out	4.63	3.86	4.42	4.30	4.72
My supervisor makes sure all employee concerns are heard before job decisions are made	4.25	4.00	4.17	4.15	4.72
Managers treat workers with respect	4.25	4.14	4.44	4.27	4.61
Leaders encourage people to ask questions	4.38	4.29	4.50	4.29	4.67
Information about important events and lessons learned is shared within my workgroup	4.50	4.29	4.44	4.31	4.67
I believe managers apply the same rules for all workers	3.88	3.86	4.21	4.01	4.50

Comparisons by location and response category continued on the next page.

Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement

Wildfire Safety	Rural Region	San Jacinto Region	San Joaquin Region	Southern Substation Ops	Substation Projects & Protection Eng
Wildfire and personal safety concerns are communicated openly	4.40	4.29	4.45	3.67	4.46
Protecting the community from wildfire hazards is clearly a high priority with management	4.49	4.45	4.63	4.17	4.69
People look for wildfire hazards and risks as work progresses	3.86	4.15	4.35	3.83	4.08
People in my workgroup report all wildfire hazards, no matter how minor	4.06	4.12	4.37	3.83	3.92
Our management acts quickly to address wildfire hazards	4.23	4.05	4.37	3.83	4.23
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.43	4.38	4.50	4.50	4.54
Leaders actively seek out signs of potential wildfire hazards	3.86	4.05	4.33	3.50	4.38
I feel comfortable discussing wildfire hazards with my supervisor	4.40	4.40	4.55	4.17	4.46
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.40	3.20	3.75	2.83	3.77

Average Response Scores by Statement

Personal Safety	Rural Region	San Jacinto Region	San Joaquin Region	Southern Substation Ops	Substation Projects & Protection Eng
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.37	4.10	4.42	3.83	4.38
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.17	4.07	4.45	4.00	4.38
I take responsibility for the safety of myself and others in my work area	4.69	4.71	4.63	4.33	4.77
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.43	4.33	4.53	4.17	4.46
Leaders keep people prepared to intervene when an emergency occurs	4.17	4.07	4.43	3.17	4.31
Leaders use mistakes and incidents as learning opportunities	4.14	4.10	4.42	3.50	4.38
Pausing work for hazards and safety concerns is viewed positively	4.34	4.34	4.52	4.33	4.46
People focus on one task at a time and avoid distractions	3.86	3.38	3.80	3.50	3.31
People have the ability to respond to and correct problems and errors before they get out of control	4.20	3.93	4.37	4.17	4.08
People have the skills they need to resolve workplace safety issues	4.14	3.93	4.35	3.83	4.50
We have the right tools for the job	4.11	3.62	4.25	3.33	4.23

Average Response Scores by Statement

Overall Culture	Rural Region	San Jacinto Region	San Joaquin Region	Southern Substation Ops	Substation Projects & Protection Eng
The company cares about my opinions	3.60	3.43	3.92	2.83	3.85
People report mistakes they make, even if others do not notice them	3.49	3.61	3.95	3.33	3.62
People listen to one another: it is rare that someone's views go unheard	4.03	3.74	4.15	3.67	4.25
People in my workgroup treat each other with respect	4.49	4.10	4.43	3.50	4.31
My supervisor would use whatever power they have to help me out	4.31	4.20	4.38	3.17	4.31
My supervisor makes sure all employee concerns are heard before job decisions are made	4.11	4.19	4.35	3.33	3.92
Managers treat workers with respect	4.20	4.24	4.42	4.17	4.25
Leaders encourage people to ask questions	4.31	4.14	4.54	3.83	4.46
Information about important events and lessons learned is shared within my workgroup	4.34	4.37	4.53	3.33	4.46
I believe managers apply the same rules for all workers	3.80	3.80	4.37	3.17	4.15

Comparisons by location and response category continued on the next page.

Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement

Wildfire Safety	Substation, Construction & Maintenance	Training	Trans & Civil/Structural ENG	Transmission	Vegetation Management Operations	Wildfire Safety
Wildfire and personal safety concerns are communicated openly	4.30	4.25	4.50	4.42	4.57	4.66
Protecting the community from wildfire hazards is clearly a high priority with management	4.58	4.33	4.87	4.55	4.67	4.88
People look for wildfire hazards and risks as work progresses	3.91	4.17	4.27	4.18	4.51	4.63
People in my workgroup report all wildfire hazards, no matter how minor	4.06	4.33	4.00	4.18	4.48	4.59
Our management acts quickly to address wildfire hazards	3.94	4.33	4.31	4.33	4.55	4.84
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.48	4.25	4.23	4.39	4.47	4.69
Leaders actively seek out signs of potential wildfire hazards	3.73	4.00	4.28	4.12	4.40	4.69
I feel comfortable discussing wildfire hazards with my supervisor	4.45	4.58	4.67	4.64	4.59	4.81
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.15	3.67	3.45	3.58	3.78	4.28

Average Response Scores by Statement

Personal Safety	Substation, Construction & Maintenance	Training	Trans & Civil/Structural ENG	Transmission	Vegetation Management Operations	Wildfire Safety
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.12	4.33	4.62	4.48	4.50	4.72
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.27	4.08	4.20	4.09	4.36	4.25
I take responsibility for the safety of myself and others in my work area	4.61	4.50	4.77	4.82	4.76	4.88
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.52	4.42	4.60	4.24	4.52	4.81
Leaders keep people prepared to intervene when an emergency occurs	4.15	4.17	4.34	4.27	4.38	4.59
Leaders use mistakes and incidents as learning opportunities	4.18	4.33	4.40	4.30	4.60	4.50
Pausing work for hazards and safety concerns is viewed positively	4.42	4.25	4.50	4.27	4.71	4.69
People focus on one task at a time and avoid distractions	3.39	3.83	3.33	3.24	4.05	3.63
People have the ability to respond to and correct problems and errors before they get out of control	4.09	4.42	4.14	4.12	4.47	4.31
People have the skills they need to resolve workplace safety issues	4.18	4.33	4.33	4.03	4.38	4.47
We have the right tools for the job	4.27	4.00	3.76	3.79	4.37	4.31

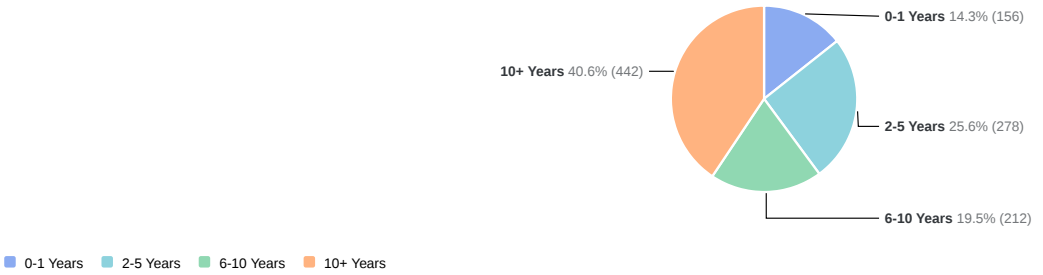
Comparisons by location and response category continued on the next page.

Average Response Scores by Statement

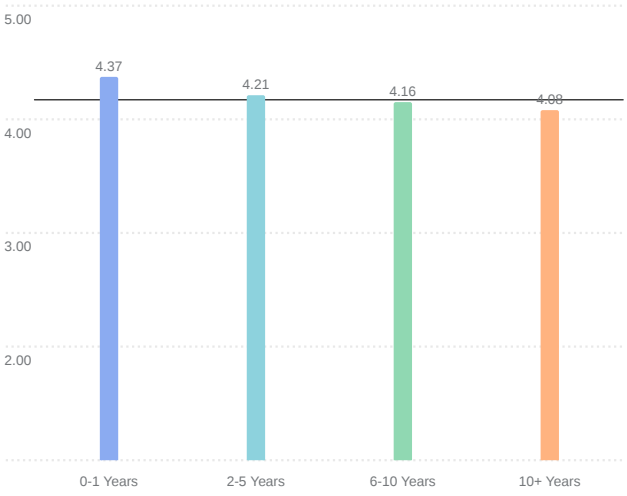
Overall Culture	Substation, Construction & Maintenance	Training	Trans & Civil/Structural ENG	Transmission	Vegetation Management Operations	Wildfire Safety
The company cares about my opinions	3.48	3.83	4.07	3.70	4.16	4.22
People report mistakes they make, even if others do not notice them	3.64	3.58	3.79	3.58	4.02	4.13
People listen to one another: it is rare that someone's views go unheard	3.91	4.00	3.93	3.97	4.26	4.38
People in my workgroup treat each other with respect	4.36	4.25	4.63	4.39	4.55	4.81
My supervisor would use whatever power they have to help me out	4.33	4.33	4.50	4.24	4.53	4.56
My supervisor makes sure all employee concerns are heard before job decisions are made	4.42	4.08	4.33	4.30	4.29	4.28
Managers treat workers with respect	3.82	4.08	4.47	4.39	4.48	4.66
Leaders encourage people to ask questions	4.36	4.08	4.38	4.33	4.60	4.53
Information about important events and lessons learned is shared within my workgroup	4.36	4.17	4.50	4.30	4.55	4.44
I believe managers apply the same rules for all workers	3.58	4.25	4.07	3.88	4.22	4.44

6. Comparison by Tenure

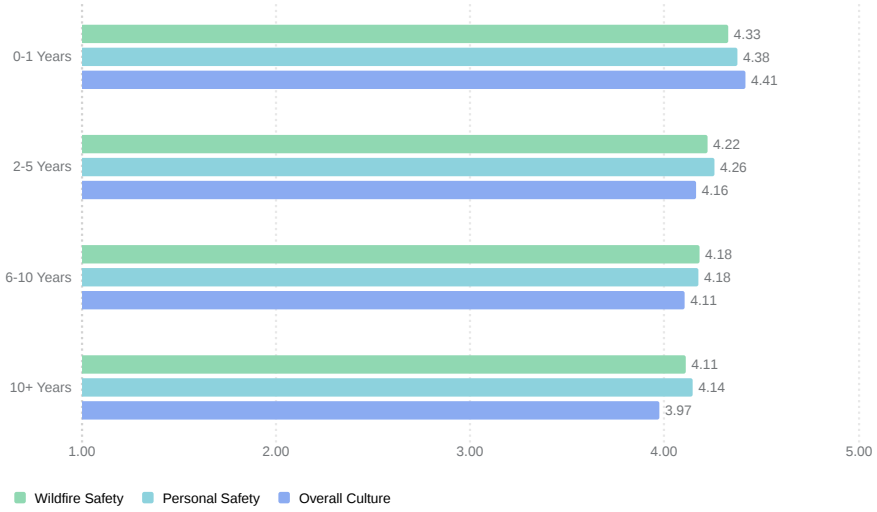
Number of Responses 1,088



Overall Average Response Score



Performance Category Average Response Scores



Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement

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	3.64	3.53	3.41	3.37
I feel comfortable discussing wildfire hazards with my supervisor	4.60	4.46	4.45	4.36
Leaders actively seek out signs of potential wildfire hazards	4.27	4.12	4.04	4.01
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.47	4.32	4.41	4.27
Our management acts quickly to address wildfire hazards	4.34	4.33	4.21	4.17
People in my workgroup report all wildfire hazards, no matter how minor	4.28	4.12	4.15	4.05
People look for wildfire hazards and risks as work progresses	4.21	4.22	4.10	4.03
Protecting the community from wildfire hazards is clearly a high priority with management	4.64	4.53	4.52	4.48
Wildfire and personal safety concerns are communicated openly	4.49	4.37	4.35	4.25

Average Response Scores by Statement

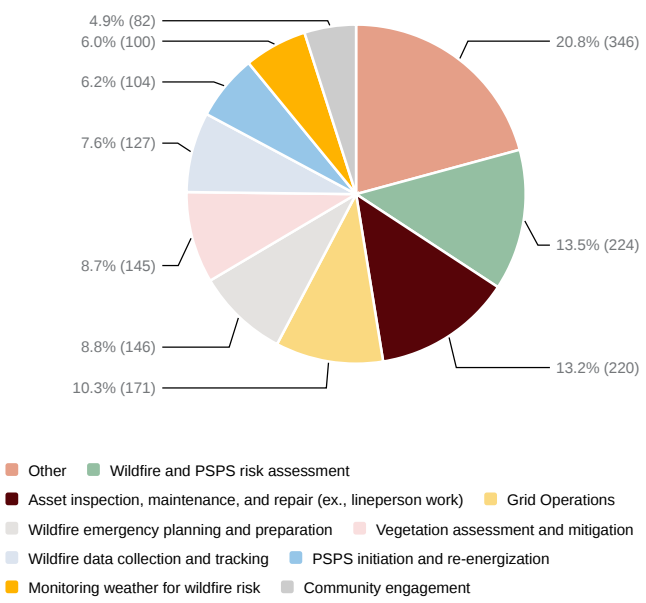
Personal Safety	0-1 Years	2-5 Years	6-10 Years	10+ Years
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.42	4.32	4.22	4.20
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.24	4.21	4.28	4.27
I take responsibility for the safety of myself and others in my work area	4.77	4.68	4.62	4.63
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.49	4.47	4.42	4.41
Leaders keep people prepared to intervene when an emergency occurs	4.39	4.26	4.17	4.08
Leaders use mistakes and incidents as learning opportunities	4.53	4.29	4.29	4.12
Pausing work for hazards and safety concerns is viewed positively	4.57	4.52	4.39	4.34
People focus on one task at a time and avoid distractions	3.77	3.58	3.46	3.45
People have the ability to respond to and correct problems and errors before they get out of control	4.34	4.22	4.10	4.04
People have the skills they need to resolve workplace safety issues	4.37	4.21	4.15	4.10
We have the right tools for the job	4.26	4.07	3.83	3.94

Average Response Scores by Statement

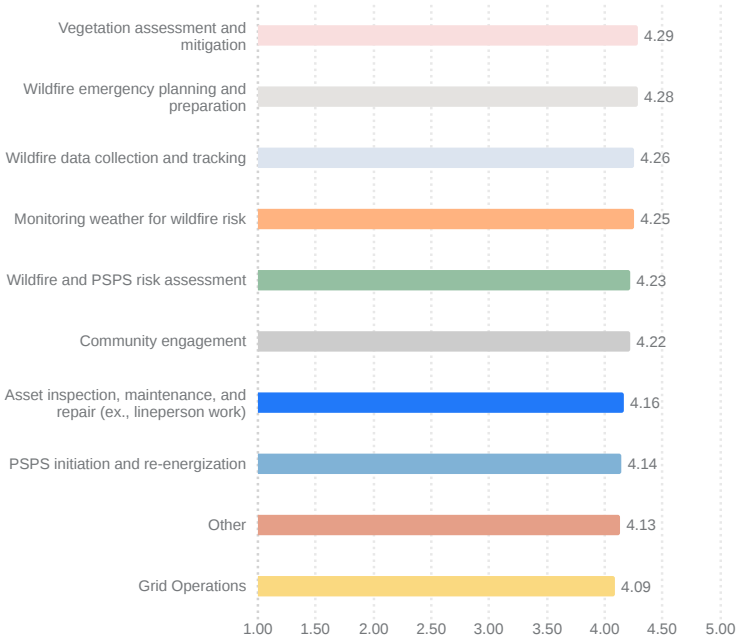
Overall Culture	0-1 Years	2-5 Years	6-10 Years	10+ Years
I believe managers apply the same rules for all workers	4.35	4.02	3.92	3.72
Information about important events and lessons learned is shared within my workgroup	4.55	4.33	4.33	4.19
Leaders encourage people to ask questions	4.62	4.35	4.34	4.19
Managers treat workers with respect	4.61	4.34	4.28	4.06
My supervisor makes sure all employee concerns are heard before job decisions are made	4.41	4.16	4.14	4.03
My supervisor would use whatever power they have to help me out	4.59	4.36	4.28	4.18
People in my workgroup treat each other with respect	4.61	4.44	4.30	4.25
People listen to one another: it is rare that someone's views go unheard	4.26	4.00	4.02	3.82
People report mistakes they make, even if others do not notice them	3.97	3.78	3.68	3.64
The company cares about my opinions	4.15	3.84	3.75	3.65

7. Comparison by Wildfire Activities

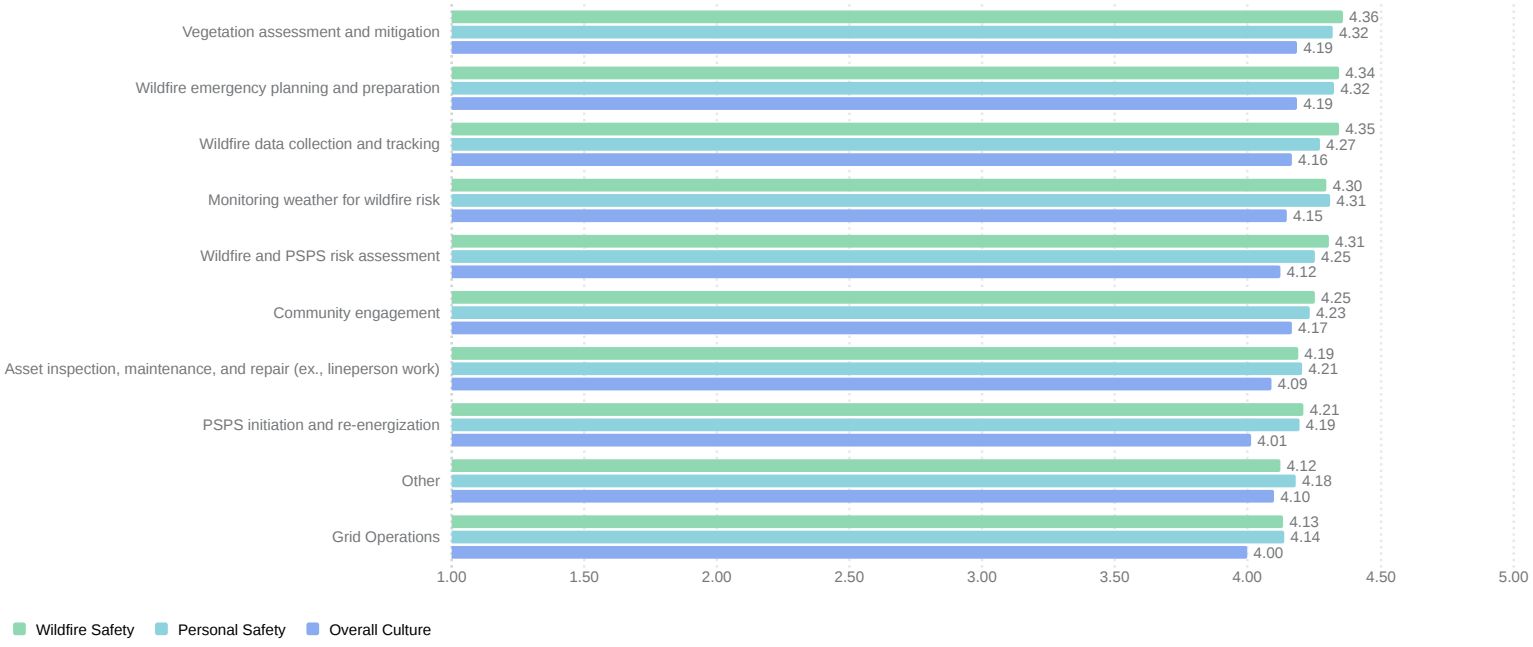
Number of Responses 987



Overall Average Response Score



Performance Category Average Response Scores



Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement

Wildfire Safety	Asset inspection, maintenance, and repair	Community engagement	Grid operations	Monitoring weather for wildfire risk	Other
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.50	3.71	3.34	3.74	3.35
I feel comfortable discussing wildfire hazards with my supervisor	4.51	4.50	4.42	4.56	4.35
Leaders actively seek out signs of potential wildfire hazards	4.06	4.15	4.06	4.18	4.00
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.33	4.35	4.35	4.41	4.29
Our management acts quickly to address wildfire hazards	4.23	4.23	4.14	4.28	4.16
People in my workgroup report all wildfire hazards, no matter how minor	4.11	4.26	4.15	4.32	4.04
People look for wildfire hazards and risks as work progresses	4.11	4.26	4.01	4.25	4.03
Protecting the community from wildfire hazards is clearly a high priority with management	4.52	4.48	4.47	4.49	4.52
Wildfire and personal safety concerns are communicated openly	4.35	4.34	4.23	4.44	4.33

Average Response Scores by Statement

Personal Safety	Asset inspection, maintenance, and repair	Community engagement	Grid operations	Monitoring weather for wildfire risk	Other
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.26	4.27	4.17	4.26	4.27
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.32	4.37	4.27	4.38	4.22
I take responsibility for the safety of myself and others in my work area	4.68	4.65	4.59	4.67	4.69
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.45	4.46	4.42	4.53	4.42
Leaders keep people prepared to intervene when an emergency occurs	4.18	4.21	4.07	4.27	4.17
Leaders use mistakes and incidents as learning opportunities	4.25	4.24	4.10	4.29	4.23
Pausing work for hazards and safety concerns is viewed positively	4.43	4.39	4.35	4.48	4.41
People focus on one task at a time and avoid distractions	3.49	3.61	3.49	3.78	3.40
People have the ability to respond to and correct problems and errors before they get out of control	4.08	4.12	4.12	4.28	4.09
People have the skills they need to resolve workplace safety issues	4.16	4.17	4.04	4.27	4.13
We have the right tools for the job	3.97	4.06	3.92	4.21	3.93

Average Response Scores by Statement

Overall Culture	Asset inspection, maintenance, and repair	Community engagement	Grid operations	Monitoring weather for wildfire risk	Other
I believe managers apply the same rules for all workers	3.87	4.06	3.77	3.92	3.90
Information about important events and lessons learned is shared within my workgroup	4.31	4.38	4.18	4.33	4.31
Leaders encourage people to ask questions	4.30	4.33	4.23	4.21	4.31
Managers treat workers with respect	4.20	4.32	4.18	4.23	4.23
My supervisor makes sure all employee concerns are heard before job decisions are made	4.11	4.17	4.00	4.20	4.13
My supervisor would use whatever power they have to help me out	4.31	4.39	4.24	4.46	4.31
People in my workgroup treat each other with respect	4.39	4.27	4.28	4.38	4.35
People listen to one another: it is rare that someone's views go unheard	3.95	4.01	3.87	4.07	3.96
People report mistakes they make, even if others do not notice them	3.70	3.84	3.62	3.82	3.68
The company cares about my opinions	3.75	3.89	3.60	3.85	3.80

Comparisons by wildfire activities and response category continued on the next page.

Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: *Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)*

Average Response Scores by Statement

Wildfire Safety	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	3.52	3.70	3.68	3.70	3.77
I feel comfortable discussing wildfire hazards with my supervisor	4.56	4.57	4.52	4.59	4.55
Leaders actively seek out signs of potential wildfire hazards	4.05	4.28	4.23	4.31	4.28
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.45	4.45	4.46	4.39	4.50
Our management acts quickly to address wildfire hazards	4.13	4.43	4.31	4.43	4.43
People in my workgroup report all wildfire hazards, no matter how minor	4.16	4.35	4.29	4.27	4.30
People look for wildfire hazards and risks as work progresses	4.11	4.37	4.28	4.27	4.24
Protecting the community from wildfire hazards is clearly a high priority with management	4.55	4.61	4.60	4.70	4.58
Wildfire and personal safety concerns are communicated openly	4.37	4.46	4.38	4.45	4.44

Average Response Scores by Statement

Personal Safety	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	4.20	4.37	4.37	4.35	4.41
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.35	4.32	4.30	4.26	4.39
I take responsibility for the safety of myself and others in my work area	4.62	4.67	4.67	4.71	4.72
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.57	4.51	4.50	4.50	4.52
Leaders keep people prepared to intervene when an emergency occurs	4.09	4.28	4.25	4.32	4.34
Leaders use mistakes and incidents as learning opportunities	4.09	4.37	4.27	4.31	4.39
Pausing work for hazards and safety concerns is viewed positively	4.44	4.58	4.43	4.51	4.53
People focus on one task at a time and avoid distractions	3.46	3.76	3.44	3.45	3.52
People have the ability to respond to and correct problems and errors before they get out of control	4.01	4.27	4.21	4.24	4.24
People have the skills they need to resolve workplace safety issues	4.24	4.21	4.26	4.31	4.38
We have the right tools for the job	4.07	4.19	4.04	4.01	4.12

Average Response Scores by Statement

Overall Culture	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	3.65	4.04	3.88	3.94	4.04
Information about important events and lessons learned is shared within my workgroup	4.30	4.37	4.31	4.34	4.44
Leaders encourage people to ask questions	4.17	4.33	4.30	4.37	4.36
Managers treat workers with respect	4.11	4.30	4.29	4.32	4.25
My supervisor makes sure all employee concerns are heard before job decisions are made	4.15	4.21	4.18	4.20	4.20
My supervisor would use whatever power they have to help me out	4.25	4.43	4.35	4.34	4.38
People in my workgroup treat each other with respect	4.37	4.40	4.43	4.48	4.37
People listen to one another: it is rare that someone's views go unheard	3.90	4.01	3.96	4.02	4.11
People report mistakes they make, even if others do not notice them	3.66	3.84	3.78	3.80	3.86
The company cares about my opinions	3.57	3.92	3.75	3.85	3.86

SOUTHERN CALIFORNIA EDISON®
Energy for What's Ahead®

Safety Culture Assessment Management Self-Assessment Report

July 2023

Southern California Edison

Section 1. Management Self-Assessment Results - 2021, 2022, 2023 to 2024 Goal

The questions on the management self-assessment are rated using a four-level behaviorally anchored rating scale (Public Compliance, Private Compliance, Stewardship, and Citizenship). The color-coded table below presents the electrical corporation's self-ranking in May 2021, August 2022, July 2023, and where the electrical corporation expects to be at the end of 2024.*

	2021	2022	2023	2024 Goal
Organizational Sustaining Systems	**Stewardship**	**Citizenship**	**Citizenship**	**Citizenship**
Wildfire Safety integrated into leader selection and promotion	Stewardship	Stewardship	Stewardship	Stewardship
Wildfire safety integrated into supervisor goals and objectives	Stewardship	Stewardship	Stewardship	Stewardship
Safety incorporated into position descriptions	Citizenship	Citizenship	Citizenship	Citizenship
Training available to frontline leaders	Stewardship	Citizenship	Citizenship	Citizenship
Training available to frontline workers	Stewardship	Citizenship	Citizenship	Citizenship
Training requirements for contractors	Citizenship	Citizenship	Citizenship	Citizenship
Rewards and incentives to support safety	Citizenship	Citizenship	Citizenship	Citizenship
Structure and Governance	**Citizenship**	**Citizenship**	**Citizenship**	**Citizenship**
Accountable for wildfire safety outcomes	Citizenship	Citizenship	Citizenship	Citizenship
Accountable for personal safety outcomes	Citizenship	Citizenship	Citizenship	Citizenship
Wildfire indicators tracked by senior leadership	Citizenship	Citizenship	Citizenship	Citizenship
Effectiveness of wildfire safety metrics	Stewardship	Citizenship	Citizenship	Citizenship
Monitor and adjust strategies to wildfire safety	Citizenship	Citizenship	Citizenship	Citizenship
Communication of wildfire safety metrics	Stewardship	Citizenship	Citizenship	Citizenship
Safety Enabling Systems	**Stewardship**	**Citizenship**	**Citizenship**	**Citizenship**
Investigations using root cause analysis	Stewardship	Citizenship	Citizenship	Citizenship
Quality of event investigations	Stewardship	Stewardship	Citizenship	Citizenship
Results of investigations	Private Compliance	Stewardship	Stewardship	Citizenship
Process for reporting wildfire hazards	Stewardship	Citizenship	Citizenship	Citizenship
Systems to encourage sensitivity to weak signals	Stewardship	Citizenship	Citizenship	Citizenship
Responding to upset conditions	Stewardship	Citizenship	Citizenship	Citizenship
Process/structures to create a learning organization	Private Compliance	Stewardship	Stewardship	Stewardship
Audits of wildfire mitigation activities	Stewardship	Citizenship	Citizenship	Citizenship
Use of audit findings and tracking to closure	Stewardship	Citizenship	Citizenship	Citizenship

**The four levels of safety culture maturity (Public Compliance, Private Compliance, Stewardship, and Citizenship) are based on research by Burke et al. (2002), (https://psycnet.apa.org/record/2002-15213-006, accessed Feb. 28, 2023) and Hofmann, Morgeson, and Gerras (2003), (https://psycnet.apa.org/record/2003-04931-017, accessed Feb. 28, 2023) and the work of Sentis Pty Ltd (https://sentis.com.au/articles/safety-citizenship, accessed Feb. 28, 2023).*

Section 1. Management Self-Assessment and Justification

Dimension 1: Organizational Sustaining Systems

The electrical corporation reported the current status of 22 safety culture elements of its organizational culture and projected their state at the end of 2024. The response options for each element are provided in this section along with the electrical corporation's self-ranking in May 2021, August 2022, July 2023, and where the electrical corporation expects to be at the end of 2024. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

1.1.1 To what extent is wildfire safety performance integrated into leadership selection/promotion decisions?

Safety Culture Maturity Scale

Public Compliance	Private Compliance	Stewardship	Citizenship
Not considered	Personal and wildfire safety performance are considered in selection/promotion decisions but are not the primary factors	Personal and wildfire safety performance are heavily weighted primary factors in selection / promotion decisions	Excellent personal and wildfire safety performance are necessary for advancement; poor safety performance eliminates leader from selection/promotion

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Stewardship	Stewardship	Stewardship

Justification

Wildfire safety performance is a component of broader safety performance and is one of several factors in determining selection or promotion. Safety is a core competency and is a component of performance management and career planning for leaders. Candidates are evaluated on safety values and performance. There is also a menu of standardized safety interview questions that must be used for selection/candidate differentiation.

1.1.2 How are wildfire safety responsibilities integrated into frontline supervisors' goals and objectives?

Safety Culture Maturity Scale

Public Compliance
No annual goals or objectives related to wildfire safety

Private Compliance
Goals and objectives focus only on lagging indicators for wildfire or personal safety related to wildfire mitigation work

Stewardship
Goals and objectives contain a mix of leading and lagging indicators for wildfire and personal safety related to wildfire mitigation work

Citizenship
Goals and objectives contain a mix of leading and lagging indicators including a focus on the quality of each frontline supervisor's visible engagement in and support of wildfire and personal safety programs and initiatives

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Stewardship	Stewardship	Stewardship

Justification

Safety, which includes wildfire safety, public and personal safety, is included in the values and competencies ratings of all leaders and employees as well as SCE's organizational goals (e.g., both lagging and leading indicators such as Serious Injuries and Safety Observations) are tracked at the corporate goal level. Wildfire safety-specific goals and objectives for leaders of frontline employees include both leading and lagging indicators and are discussed in operational performance meetings. Wildfire safety leading indicators encompass WMP implementation/deployment of mitigations (e.g., covered conductor miles), and wildfire safety lagging indicators include CPUC reportable ignitions and PSPS customer minutes of interruption. In 2023, SCE focused on driving field safety observations, result in recognition and/or opportunities for improvement to better foster visible leader safety engagement as part of the concrete steps SCE is taking to advance to level 4 maturity.

1.1.3 To what extent is safety and the ability to work safely incorporated into position descriptions and expectations?

Safety Culture Maturity Scale

Public Compliance

No mention of safety

Private Compliance

Focus is on compliance with rules and dismissal if found out of compliance

Stewardship

Emphasis on more than just compliance with rules, but each employee's position description includes that each employee has to speak up and intervene if unsafe conditions exist, both for wildfire and personal safety

Citizenship

Emphasis on each person's role and the expectation and mechanism to hold the organization accountable if unsafe conditions exist, both for wildfire and personal safety

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Citizenship	Citizenship	Citizenship	Citizenship

Justification

Safety is one of SCE's corporate values, which sets foundational performance expectations for all employees, and demonstrates an unwavering commitment to safety. Safety performance expectations are included in our competency model and all position descriptions and incorporated into annual goals. SCE reinforces expectations for leaders to create an environment where employees can speak up through ongoing company-wide discussions (e.g., Safety Stand Ups). All employees, including Officers, are held accountable for safety outcomes exemplified through impacts to compensation and annual performance ratings. Executive leadership is informed of incidents and accountable to ensure corrective actions are implemented and adhered to.

1.2.1 To what extent are training and support resources available to frontline supervisors to improve their safety leadership skills?

Safety Culture Maturity Scale

Public Compliance

No training available

Private Compliance

Job-specific wildfire safety training focused on rules compliance, procedures, and safety systems (e.g., familiarity with wildfire-related job procedures or personal safety related procedures)

Stewardship

Job-specific wildfire safety training; in addition, wildfire safety training beyond job requirements (e.g., wildfire mitigation strategy and initiatives), and leadership training (giving feedback, accountability, etc.)

Citizenship

All criteria in “Stewardship” option are met; In addition, training includes advanced safety topics such as exposure management, and human performance reliability

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Citizenship	Citizenship	Citizenship

Justification

SCE provides job-specific wildfire training (e.g., hot work restrictions) and technical training for our workers to safely perform their job tasks. Safety culture training was also deployed to all employees and leaders, providing practical tools for leaders to support a strong safety culture, influence safe behaviors aligned with our values, and inspire employees to take ownership of their safety. In 2022, SCE implemented Human and Organizational Performance (HOP) training for our Substation Construction and Maintenance group, which continued our journey of providing a human performance foundation across our safety culture and wildfire mitigation efforts. SCE is also providing skill practice and practical tools and resources to frontline leaders to build capabilities for coaching conversations to improve safety performance. SCE will continue to expand the HOP training audience and provide training focused on hazard identification and mitigation skills for frontline leaders.

1.2.2 To what extent are training and support resources available to frontline workers to improve their wildfire safety skills?

Safety Culture Maturity Scale

Public Compliance

No training available

Private Compliance

Job-specific wildfire safety training focused on rules compliance, procedures, and safety systems (e.g., familiarity with wildfire-related job procedures or personal safety related procedures)

Stewardship

Job-specific wildfire safety training; in addition, wildfire safety training beyond job requirements (e.g., wildfire mitigation strategy) and behavior-based safety training (observing safe behaviors, approaching others, etc.)

Citizenship

All criteria in “Stewardship” option are met; In addition, training includes advanced safety topics such as human performance reliability

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Private Compliance	Stewardship	Stewardship	Stewardship

Justification

SCE provides job-specific wildfire training (e.g., hot work restrictions) and technical training to our workers to safely perform their job tasks. SCE annually trains field employees and briefs its contractors engaged in wildfire mitigation activities. In addition, regular training updates are conducted proactively to address operational changes or identified risks. Safety culture training was also deployed to all employees and leaders, providing practical tools for leaders to support a strong safety culture, influence safe behaviors aligned with our values, and inspire employees to take ownership of their safety. SCE has also provided safety observation training to frontline workers coupled with paired safety observations to provide on-the-job coaching for leaders. Human and Operational Performance (HOP) training was implemented in 2022 and continues to expand across T&D in 2023 and beyond.

1.2.3 What are the personal safety and wildfire-specific training requirements of contractors?

Safety Culture Maturity Scale

Public Compliance
No safety training required

Private Compliance
Site or location-specific general safety introduction and orientation

Stewardship
Electrical corporation-wide standardized safety training in addition to site-specific orientation

Citizenship
Electrical corporation-wide standardized safety training in addition to site-specific orientation and wildfire hazard awareness training

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Citizenship	Citizenship	Citizenship	Citizenship

Justification

SCE does not train our contract workforce but sets requirements for training and documentation of safety culture leadership, wildfire-specific, and safety orientations. Training courses prepare contractors to perform their job based on site-specific requirements. Programs including Work Restrictions During Elevated Fire Conditions, Hazard Assessment, and Safety Plan provides wildfire hazard awareness and mitigation requirements on which contractors are responsible for training their employees and subcontractors. SCE provides standardized Wildfire Prevention requirements for contractors to ensure employees are trained and in compliance with SCE’s High Fire Risk Areas Hot Work Restrictions & Mitigation Measures Program. Contractor Safety and Supply Management groups ensure consistent requirements are in place across tier one contractors and conducts observations to ensure compliance with all safety requirements including fire plans implementation and protocols.

1.3.1 To what extent do rewards and incentives for operational leaders and workers support safety and mitigating wildfire hazards?

Safety Culture Maturity Scale

Public Compliance

No rewards or incentives specific to safety or wildfire safety

Private Compliance

Rewards and incentives only focus on lagging indicators such as achieving no injuries or wildfires

Stewardship

Rewards and incentives emphasize lagging indicators for personal and wildfire safety and some leading indicators related to wildfire mitigation activities

Citizenship

Rewards and incentives focus on leadership activities such as reporting wildfire concerns, generating innovative ideas to reduce wildfire hazards, and approaching others about safety concerns

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Citizenship	Citizenship	Citizenship	Citizenship

Justification

Safety performance, encompassing worker, public, and wildfire safety, is a significant factor in determining rewards/incentives. Eligible employees are rewarded for impactful actions or observations through annual incentive programs and other enterprise-wide programs (such as Safety Recognition, spot bonuses, and Operational Excellence Catalyst). The annual incentive program assigns a target weighting of 55% to safety and resiliency goals emphasizing their importance. For 2023, a safety observation goal focused on improving the quality of field safety observations by recognizing desired safety behaviors and coaching for improvement opportunities. Annual incentive payouts and base pay increases for eligible employees are performance-based, considering factors related to wildfire safety and worker and public safety. These factors also play a crucial role in leadership selection/promotion decisions (as described in 1.1.1).

Section 1. Management Self-Assessment and Justification

Dimension 2: Structure and Governance

The electrical corporation reported the current status of 22 safety culture elements of its organizational culture and projected their state at the end of 2024. The response options for each element are provided in this section along with the electrical corporation's self-ranking in May 2021, August 2022, July 2023, and where the electrical corporation expects to be at the end of 2024. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

2.1.1 Who is accountable for wildfire safety outcomes?

Safety Culture Maturity Scale

Public Compliance	Private Compliance	Stewardship	Citizenship
Not defined	Safety department	Operational leadership and Safety Department	Executive leadership with Safety Department as trusted advisor

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Citizenship	Citizenship	Citizenship	Citizenship

Justification

SCE's portfolio of wildfire mitigation activities is designed to reduce wildfire risks and improve associated safety outcomes. Goals and targets related to operational deployment of these activities are established at the corporate and organizational unit levels and assigned to a responsible executive. Specific safety goals for employee, contractor, and public safety are also established at the corporate level. Performance against these goals is reviewed throughout the year by management with periodic reporting to the Board. Regular executive leadership forums, comprised of SCE officers, specifically focus on monitoring wildfire mitigation action plans and strategies through a systematic risk-informed perspective to proactively mitigate risk for the public and our workers. SCE's maturity model reinforces personal safety ownership and accountability progressing to Stewardship, building on our foundation of workers proactively sharing knowledge of hazards and shared safety ownership.

2.1.2 Who is accountable for personal safety outcomes?

Safety Culture Maturity Scale

Public Compliance	Private Compliance	Stewardship	Citizenship
Not defined	Safety department	Operational leadership and Safety Department	Executive leadership with Safety Department as trusted advisor

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Citizenship	Citizenship	Citizenship	Citizenship

Justification

SCE's Safety Culture Maturity model reinforces personal safety ownership and accountability through programs, training, and resources to anchor our safety culture in Private Compliance, where employees are inherently motivated to make safe choices to protect themselves for who and what they value. All employees, including Officers, are held accountable for safety outcomes via impacts to compensation and annual performance ratings. Operational leadership and Edison Safety are accountable by ensuring incidents are assessed (e.g., investigations, root cause evaluations) and comprehensive corrective actions are identified and deployed. Executive leadership is informed of incidents and accountable to ensure corrective actions are implemented and adhered to.

2.1.3 Rate the types of wildfire safety indicators and objectives tracked by senior operational leadership.

Safety Culture Maturity Scale

Public Compliance
No wildfire safety objectives

Private Compliance
Leading and lagging wildfire safety indicators required to be reported for regulatory purposes

Stewardship
Required safety measures for regulatory purposes. Additional leading indicators used for wildfire mitigation work that are aligned with actionable initiatives

Citizenship
Required safety indicators. Additional leading indicators used for wildfire mitigation work that are aligned with actionable initiatives at each level of the organization

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Citizenship	Citizenship	Citizenship	Citizenship

Justification

Leading and lagging wildfire safety indicators are tracked through our councils and routine reporting. All levels of teams have goals anchored to concrete activities that are tracked/cascaded at multiple levels of the organization.

2.2.1 How effective are wildfire safety metrics in providing insight into critical areas of risk?

Safety Culture Maturity Scale

Public Compliance	Private Compliance	Stewardship	Citizenship
Not effective	Reasonably effective in providing data and trends across company	Highly effective in providing data and trends in critical exposure areas	Highly effective in providing data, critical exposure area trends, and actionable insights

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Citizenship	Citizenship	Citizenship

Justification

Established regular review and trend analysis of inspection findings, in addition to fire investigations, provide potential insights for new and refined mitigations. SCE is continuously refining its wildfire risk models to be more granular and precise. This enables SCE to identify priority areas for deployment (e.g., Areas of Concern), which further allows SCE to take actionable insights in the higher risk areas. Going forward, SCE will continue seeking to improve its ability to capture wildfire data and trends.

2.2.2 How frequently does the senior safety team monitor and adjust actions and strategies related to wildfire safety?

Safety Culture Maturity Scale

Public Compliance

Never

Private Compliance

Periodically (at even or uneven intervals; for example, once or twice a year as wildfire season approaches)

Stewardship

Often (at even or uneven intervals; for example, 3-5 times per year) monitors action plans and responds to emerging issues and developments

Citizenship

Regularly (at even intervals; for example, monthly) monitors action plans and strategies. Conducts real time strategic problem solving focused on systemic risks

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Citizenship	Citizenship	Citizenship	Citizenship

Justification

SCE has regularly scheduled (e.g., weekly, and monthly) wildfire-specific forums with senior officers, which include key members of the Executive Safety Council and Senior Safety Council, to review data and trends, develop strategic and actionable plans, and resolve emergent issues associated with wildfire safety.

2.2.3 To what extent are wildfire safety metrics communicated throughout the organization?

Safety Culture Maturity Scale

Public Compliance
Safety metrics are not shared

Private Compliance
Lagging indicators for wildfire outcomes are posted at local/site operations

Stewardship
Lagging and leading measures for wildfire safety are posted and discussed in regular management and supervisor meetings

Citizenship
Lagging and leading indicators for wildfire safety are discussed; individual/ team contributions to leading indicators are highlighted and recognized publicly

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Citizenship	Citizenship	Citizenship

Justification

Both leading and lagging wildfire mitigation metrics are discussed regularly in leadership meetings, which include activity leads, supervisors, and executive leadership. In these meetings, metrics and performance against the metrics are reviewed on a regular basis. Individuals and teams are recognized in these meetings for contributions that meet and exceed wildfire mitigation targets. Furthermore, SCE highlights major wildfire mitigation achievements and progress in its regular public digests/newsletters (e.g., Edison Energized). Going forward, SCE will continue seeking to expand the forums where team and individual contributions are recognized.

Section 1. Management Self-Assessment and Justification

Dimension 3: Safety Enabling Systems

The electrical corporation reported the current status of 22 safety culture elements of its organizational culture and projected their state at the end of 2024. The response options for each element are provided in this section along with the electrical corporation's self-ranking in May 2021, August 2022, July 2023, and where the electrical corporation expects to be at the end of 2024. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

3.1.1 What types of adverse events are investigated using root cause analysis?

Safety Culture Maturity Scale

Public Compliance

Only fatal or serious incidents required to be reported to OSHA, CPUC reportable ignitions, or incidents required to be reported to Energy Safety (pursuant to Cal. Code Regs. title 14, Section 29301)

Private Compliance

All incidents required to be reported; in addition, work-related injuries involving days away from work and fire incidents that do not meet CPUC reporting standards

Stewardship

All incidents with the potential to be serious or fatal, including near misses

Citizenship

All high potential events and near misses. Also, event learning teams evaluate high risk situations for proactive opportunities to reduce exposure

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Citizenship	Citizenship	Citizenship

Justification

SCE's approach to personal safety is aligned with the EEI Safety Classification and Learning model. High energy (actual and potential) and low energy serious injuries and all fatalities are evaluated using a rigorous cause evaluation process or learning team. Some days away from work incidents are evaluated using a cause evaluation methodology or learning team. Learning teams are also used to evaluate controls for our highest serious injury and fatality exposures. For all incidents – wildfire, employee or contractor, and public safety – Incident trends are identified, and common cause evaluations initiated where warranted. Effectiveness reviews are established for all root cause evaluations. Incidents involving contracted personnel are evaluated to identify potential gaps in SCE's oversight and associated corrective actions are implemented.

3.1.2 Rate the quality of event investigations.

Safety Culture Maturity Scale

Public Compliance	Private Compliance	Stewardship	Citizenship
A “fix the employee” mentality is commonplace when addressing incidents or other adverse events	Investigations primarily focus on identifying exposure and the root cause of the exposure	Investigations focus on identifying the root cause of the exposure and describing actions to control the exposure	Incidents are regarded as learning events that spur a comprehensive look at culture, processes, and safety systems that led to the event

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Stewardship	Citizenship	Citizenship

Justification

SCE has a rigorous cause evaluation process for investigating actual and potential injury/illness incidents of employees, contractors, and members of the public. After the incident report is received, employee incident evaluations are performed in partnership between the line organization and Edison Safety, facilitated by trained evaluators. The process identifies organizational, programmatic and cultural causes leading to associated corrective actions aimed at controlling exposure. These actions are then documented in the Incident Management System. Wildfire and public safety investigations operate at level 4 and focus root cause identification and recurrence prevention. SCE reviews ignitions (CPUC reportable and non-CPUC reportable) for lessons learned, mitigation effectiveness, and additional driver solutions. SCE has implemented practices aligned with level 4 for personal safety and anticipates continued progression as these practices mature.

3.1.3 What happens with investigation results?

Safety Culture Maturity Scale

Public Compliance	Private Compliance	Stewardship	Citizenship
Reported to the regulator if required, but no systemic tracking, corrective actions or closure/sharing of corrective actions	Corrective actions are tracked and are predominantly focused on rule changes, personal protective equipment, and training	Corrective actions are tracked to closure and include more focus on high value controls; lessons learned are shared throughout the organization	Systemic approach to tracking/closing actions using high value controls; lessons learned leveraged broadly across the organization to effect change and control exposure (e.g., leading to procedural or policy changes throughout organization where applicable)

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Private Compliance	Stewardship	Stewardship	Citizenship

Justification

Cause evaluations are performed for significant safety incidents involving employees, contractors, and members of the public and the resulting actions are developed to help prevent repetition or mitigate consequences. SCE has a system in place to track and close actions, and share learnings from serious incidents, close calls, and cause evaluations continuously throughout the organization. A committee of SCE leaders reviews all serious injury (actual and potential) and fatality cause evaluations ensuring causes have appropriate corrective actions to correct the problem. Corrective actions address procedures or policies, to engineer out or eliminate hazards and ensuring controls are in plate to mitigate SIFs. Learnings and actions from cause evaluations are timely shared throughout the organization, with our contractors, and through industry forums. SCE continues to see improvement in the number of corrective actions higher on the hierarchy of controls.

3.2.1 What kind of process is used by frontline workers to recognize and report wildfire hazards?

Safety Culture Maturity Scale

Public Compliance

No formal process

Private Compliance

Process exists to report wildfire hazards but no training or feedback

Stewardship

Process established, workforce is trained in the process, and it is communicated widely; there is consistent follow-up to reduce exposure

Citizenship

Process established and communicated for wildfire hazard reporting; workforce is trained in the process and encouraged to report wildfire hazards; results broadly shared across the organization to spur learning and exposure reduction

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Citizenship	Citizenship	Citizenship

Justification

SCE has an established process for inspections and remediations (including PSPS pre- and post-patrols). Status and progress are shared broadly for visibility and action. Safety culture efforts also reinforce ownership and discretionary effort to address safety hazards, even when not explicitly performing an assigned job function. For example, SCE's high-fire inspection forms allow inspectors to provide feedback on the risk of the structure they inspect. Furthermore, inspection teams have proactively communicated structures they feel should be inspected more frequently, demonstrating a positive wildfire safety culture being instilled across our organization. This type of feedback is encouraging and reduces exposure. SCE has continued more targeted sessions with execution organizations to provide information on the risk-modeling driving their wildfire work and collect any actionable feedback to modify existing processes and/or mitigations.

3.3.1 What structures, systems, and/or process have been established to encourage sensitivity to weak signals of wildfire hazards?

Safety Culture Maturity Scale

Public Compliance
No formal process or structure

Private Compliance
Workforce is encouraged to report wildfire hazards as it sees them

Stewardship
System established for reporting and mitigating wildfire hazards; frontline supervisors encourage reporting of weak signals

Citizenship
A cross-functional team is established to proactively look for, track, and mitigate wildfire hazards and potential black swan situations

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Citizenship	Citizenship	Citizenship

Justification

SCE interprets weak signals and black swans as indicators that are low frequency/high severity that would not historically lead to prediction of a wildfire. As noted above, SCE reviews all ignitions and develops solutions to drivers in addition to those mitigated by SCE's mitigation portfolio. These reviews can uncover weak signals; for example, when SCE noted an uptick in secondary conductor-caused ignitions, SCE leveraged data to implement changes, which included modifications to inspection forms and a secondary conductor vegetation pilot. Moreover, SCE's Enterprise Risk Management program has a process to evaluate potential black swans and trains management on how to spot low frequency/high severity and outlier opinions.

3.3.2 What steps are taken to ensure frontline supervisors and workforce can respond quickly to upset conditions?

Safety Culture Maturity Scale

Public Compliance

No formal training or preparation

Private Compliance

Common upset conditions have been identified and response protocols are reviewed regularly

Stewardship

Simulations and drills are conducted regularly to prepare the workforce

Citizenship

Simulations and drills are conducted regularly to practice responses to upset conditions and leaders have instilled a “what could go wrong?” mentality

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Citizenship	Citizenship	Citizenship

Justification

SCE conducts regular training and exercises at multiple levels of the company and with local agencies, incorporating federal and/or state training standards (e.g., FEMA NIMs, Cal OES SEMS), throughout the year. SCE conducts PSPS-specific training and exercises, and routinely conducts exercises on seismic events, windstorms, rainstorms, and wildfires. SCE annually trains field employees and briefs its contractors engaged in wildfire mitigation activities. Regular training updates occur based on proactive operational changes or identified risks. These exercises result in after-action reports and corrective actions. Field response is supplemented by an Incident Management Team to ensure operations have appropriate access to personnel and material resources to respond to adverse conditions. As noted earlier, Enterprise Risk Management trains leaders to identify and address risk, further cultivating a “what could go wrong” mentality.

3.3.3 What processes and structures have been established to create a learning organization?

Safety Culture Maturity Scale

Public Compliance

Few processes, training or structures have been established for sharing safety-related lessons learned across the organization

Private Compliance

The organization has implemented a knowledge management system for sharing safety-related best practices and incidents throughout the organization

Stewardship

All criteria met in “Private Compliance” option, plus processes exist for systematically using the knowledge management system and implementing safety-related best practices

Citizenship

All criteria met in “Stewardship” option, plus these processes for tapping best practices in knowledge management system are used routinely and by nearly everyone

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Private Compliance	Stewardship	Stewardship	Stewardship

Justification

SCE has a collection of systems, processes, structures, and tools to incorporate safety lessons learned and cause evaluations on an ongoing basis in various company-wide learning forums. A cross-functional safety governance structure regularly reviews corrective actions and findings, which are shared broadly across the organization (e.g., operating experiences summarize cause evaluations and corrective actions for leaders to cascade down). Leaders use safety dashboards that provide real-time safety performance data to inform adjustments and additional actions. SCE also benchmarks and shares safety practices with IOUs/industry groups (e.g., EEI, NATF, IWRMC). SCE remains committed to cultivating a learning mindset in all employees and has implemented several enterprise-wide forums to solicit, share, and implement safety and work process enhancements (e.g., Operational Excellence Catalyst, Xchange, Safety Triple Crown). This remains a core area of focus through 2023 and beyond.

3.4.1 What types of safety audits are used for activities related to wildfire mitigation?

Safety Culture Maturity Scale

Public Compliance	Private Compliance	Stewardship	Citizenship
No formal self-audits conducted	Site-specific self-audits required; internal audits occur only after an incident has occurred	Site-specific self-audits required; internal audits occur based on level of wildfire risk present	Systemic and rigorous self, independent, and internal audits conducted and used for alignment, calibration, and learning

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Citizenship	Citizenship	Citizenship

Justification

SCE's internal audit department's annual audit plan is risk based and includes wildfire related operations as this is a key risk for the company and the public SCE serves. The department conducts independent, rigorous and systemic operational, safety, and wildfire audits leveraging a team of engineers and health and safety professionals focused on continuous improvement and proactively identifying and remediating control weaknesses. SCE also uses a co-sourcing strategy to integrate external technical experts in its independent audit team. Audit findings are reviewed by senior management and identification of broader trends, and all audit observations are tracked to closure.

3.4.2 How are the findings from safety audits used for activities related to wildfire mitigation tracked to closure?

Safety Culture Maturity Scale

Public Compliance
No formal tracking mechanism

Private Compliance
Self-tracking of closures; no verification

Stewardship
Audit findings tracked and verified to closure

Citizenship
Audits tracked, implementation verified to closure, and effectiveness validated

Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Citizenship	Citizenship	Citizenship

Justification

All audit observations are tracked via an audit management system, TeamMate. Management is sent a series of reminders regarding audit observation due dates. Before an observation can be marked as closed, it must be verified by the assigned auditor after reviewing evidence. Follow-up audits are required for all high-rated observations to further evaluate effectiveness of implemented solutions. Senior management review findings with an emphasis on high-rated and overdue findings.

Section 2. Summary Plan for 2024

The electrical corporation submitted a summary action plan for the work that is planned for the coming 12-month period to achieve the targets for the end of 2024 indicated in its management self-assessment. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

A1. Action/Activity 1

Equip management review committee members with a safety culture guide to assess safety culture factors when evaluating incidents

B1. Deadline	C1. Management Self-Assessment Reference(s)
12/31/2023	3.1.2 Rate the quality of event investigations

A2. Action/Activity 2

Equip learning teams with a safety culture guide to assess safety culture factors when evaluating exposures.

B2. Deadline	C2. Management Self-Assessment Reference(s)
12/31/2023	3.1.2 Rate the quality of event investigations

Section 3. Safety Culture Objectives, Lessons Learned, and 2022 Recommendations

The electrical corporation provided a description of their 12 month and 3-year safety culture objectives along with a summary of lessons learned, and a report on the implementation of recommendations from the previous year's SCA report. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

3.1 Objectives for the Next 12 Months

A1. Objective 1

Continue improving leader ownership of safety focusing on safety culture engagement and safety commitments/plans anchored in SCE triennial safety culture assessment findings

B1. Progress Metrics (if applicable)

Cultural indicators are assessed through a combination of triennial Safety Culture Assessments and regular Safety Culture Pulse Surveys

1. Leader time in field
2. Felt leadership through employee perception of leader engagement
3. Leaders speaking positively about safety culture
4. Safety leadership progress through employee perception of leader engagement
5. Leader safety observation feedback and coaching

C1. 12-Month Target

1. Increase leader time in field
2. Improve employee perception of quality of supervisor safety engagement
3. Increase number of leaders speaking positively about safety culture
4. Improve employee perception of leader's safety leadership
5. Increase number of leader observations with identified opportunities for improvement

D1. Description of Objective

SCE's Safety Programs are focused on driving systematic risk identification and mitigation and are enhanced by safety culture tools which embed consistent shifts in employee safety mindset and behaviors to reduce wildfire and safety risk. Leader safety ownership in conjunction with existing controls and accountability measures will ensure leaders understand and have the tools to fulfill their role in executing and reinforcing our safety and wildfire mitigation programs.

A2. Objective 2

Increase frequency of intrinsically motivated Safe Worker Behaviors (Safety Ownership)

B2. Progress Metrics (if applicable)

1. Worker willingness to implement safety culture changes
2. Workers observing peers speaking positively about safety culture
3. Worker comfort in speaking up when experiencing a safety concern

C2. 12-Month Target

1. Increase number of workers willing to implement safety culture changes
2. Increase number of observations of peers speaking positive about safety culture
3. Increase number of workers who feel comfortable speaking up to address a safety concern

D2. Description of Objective

SCE's Safety Culture Maturity Model is currently focused on progressing from Public Compliance where employees follow rules primarily as a result of potential consequences, to Private Compliance, where employees are motivated to make safe choices because they inherently value protecting themselves and the public. A private compliance mindset sets the foundation for discretionary effort to execute on all safety goals, including Wildfire Mitigation and SIF prevention efforts currently implemented to systematically identify and reduce risk exposure. SCE's Wildfire Mitigation and Safety Programs drive improved work practices, risk identification and mitigation; intrinsic motivation (safety ownership) drives acceptance and adoption; this integrated approach holistically addresses wildfire and safety risks to the public and our workers.

Section 3. Safety Culture Objectives, Lessons Learned, and 2022 Recommendations

The electrical corporation provided a description of their 12 month and 3-year safety culture objectives along with a summary of lessons learned, and a report on the implementation of recommendations from the previous year's SCA report. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

3.2 Objectives for the Next 3 Years

A1. Objective 1

Anchor safety culture maturity in Private Compliance - where leaders are accountable for safety culture/outcomes, and employees consistently demonstrate safe behaviors.

B1. Progress Metrics (if applicable)

SCE uses a 25-dimension safety culture maturity model that evaluates safety environment within the company, safety practices, personal accountability, and leadership.

C1. 3-Year Target

Continued measurement of safety culture progress and impact through regular safety culture pulse surveys.

D1. Description of Objective

A private compliance mindset sets the foundation for employee discretionary effort and leadership safety ownership and accountability to execute on all safety goals including Wildfire Mitigation and SIF prevention programs currently implemented to systematically identify and reduce risk exposure. SCE's Wildfire Mitigation and Safety Programs drive improved work practices, risk identification and mitigation; employee intrinsic motivation and leadership safety ownership drives acceptance, adoption, and accountability; this integrated approach holistically addresses wildfire and safety risks to the public and our workers.

A2. Objective 2

Begin evolving safety culture mindset and actions to Stewardship level of maturity where all employees collectively engage in and reinforce making safe choices and consistently demonstrate safe behaviors.

B2. Progress Metrics (if applicable)

SCE triennial Safety Culture Assessment currently being conducted will determine specific areas of opportunities to ensure targeted actions and appropriate measures are implemented.

C2. 3-Year Target

Continued measurement of safety culture progress and impact through regular safety culture pulse surveys.

D2. Description of Objective

SCE attaining a Stewardship level of safety culture maturity builds on our foundation of Private Compliance, with workers proactively sharing knowledge of hazards and learnings through increased trust and shared safety ownership. There is increased cross-functional safety ownership and good safety performers are recognized as strong exemplars in the organization. These anchors of a Stewardship safety culture contribute to a proactive learning organization where teams go above and beyond to identify and mitigate exposures, including Wildfire and SIF. Teams govern themselves and hold each other accountable for Safety and Wildfire Mitigation outcomes.

Section 3. Safety Culture Objectives, Lessons Learned, and 2022 Recommendations

The electrical corporation provided a description of their 12 month and 3-year safety culture objectives along with a summary of lessons learned, and a report on the implementation of recommendations from the previous year's SCA report. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

3.3 Lessons Learned

A1. Major Theme/ Lesson Learned 1

Deepen Leadership Safety Ownership & Accountability

B1. Actions Taken

1.Provided 1:1 coaching for leaders to help them better demonstrate safety ownership
2. Refined leader performance development plan goals to drive tighter focus on safety, specifically in identifying and mitigating risk
4. Conducted leader-led organizational-wide Safety Stand Ups focused on addressing themes from our latest internal safety culture assessment

A2. Major Theme/ Lesson Learned 2

Increase leader visibility and time in field

B2. Actions Taken

1. Develop safety culture interventions that deep dived targeted locations to drive better felt leadership and leader safety engagement in the field
2. Measured and shared leadership time in field through safety culture pulse to better understand areas for improvement and/or recognition
3. Implemented a safety observation organizational goal to structure and encourage leader field engagement
4. Provided leaders with coaching tools and skills to improve felt leadership when they are in the field

A3. Major Theme/ Lesson Learned 3

Improve the quantity and quality of safety recognition

B3. Actions Taken

1. Provided all leaders with cognitive behavioral safety culture training to improve recognition skills
2. Implemented a safety observation organizational goal that includes safety recognition as a KPI
3. Implemented leadership "huddles" to provide a forum where positive safety behaviors are highlighted and recognized by leaders.

A4. Major Theme/ Lesson Learned 4

Increase psychological safety (speaking up & stopping work)

B4. Actions Taken

1. Engaged leaders in broader culture workshops to help them better create an environment for employees to speak up
2. Provided leaders with specific tools through safety culture leadership training and Cultural Differences training to engage employees in psychologically safe discussions and to better foster a psychologically safe work environment
3. Providing front line leaders with real time coaching and peer to peer discussions to further embed skillset and tools to sustain a psychologically safety work environment
4. Conducted leader-led organizational-wide Safety Stand Ups focused on addressing themes from our latest internal safety culture assessment, including cultivating a speak up culture

A5. Major Theme/ Lesson Learned 5

Increase the quantity and quality of safety observations

B5. Actions Taken

1. Conducted paired safety observations with frontline leaders to develop and embed safety observation skillset
2. Implemented safety observation training for all field leaders to improve coaching and recognition skillsets
3. Implementing a new incident management system to streamline the safety observation program

A6. Major Theme/ Lesson Learned 6

Improve employee participation in safety

B6. Actions Taken

1. Engaging employees and leaders in enterprise-wide competition to submit grassroots safety projects that drive safety continuous improvements
2. Conducting safety Kaizens with front line employees to develop and implement mitigations for high hazard risks
3. Conducting annual competition that recognizes employees for developing, implementing and measuring the impact of targeted safety projects

Section 3. Safety Culture Objectives, Lessons Learned, and 2022 Recommendations

The electrical corporation provided a description of their 12 month and 3-year safety culture objectives along with a summary of lessons learned, and a report on the implementation of recommendations from the previous year's SCA report. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

3.4 2022 Recommendations

A1. Recommendation 1

Continue to Build SCE's Capacity as a Learning Organization

B1. Actions Taken

• Expanded the deployment of HOP training to other organizational units
• Expanded communications for frontline employees that link root cause, lessons learned and work practices

C1. Results

Continuing to see signs of progress in:
• Increased frequency and expanded audience for sharing lessons learned
• Improved timeliness of developing preliminary lessons learned
• Improved understanding of human and organizational performance concepts

A2. Recommendation 2

•Optimize Safety Communications Between Leadership and Frontline Workers

B2. Actions Taken

Strengthened safety communication channels between leadership and frontline workers:
• Completed training and refinement of communication to improve awareness of wildfire safety protocols
• Executed one-on-one communication engagement strategy that established a dialogue with the frontline workforce to understand employee sentiments, needs, and to improve awareness on wildfire safety protocols and decisions
• Revamping PSPS frontline workforce training based on feedback

C2. Results

• Improvement in awareness of wildfire safety protocols
• Improved communication with frontline workforce on wildfire safety protocols

A3. Recommendation 3

•Mitigate Risk Exposure Posed by Interactions with the Public

B3. Actions Taken

Sustain ongoing efforts to mitigate workers' risk exposure posed by interactions with discontented members of the public:
• Trending incidents to identify drivers and mitigating actions
• Training employees to proactively mitigate threats from members of the public
• Provided bi-lingual training for contractors to proactively mitigate threats from members of the public
• Increased outreach to educate employees on actions to proactively mitigate threats and assaults from members of the public.
• Maintained and distributed records regarding customers who have presented or may present a potential threat to employees.
• Provided employees proactive actions to mitigate recurrence
• Provided security escort to aerial inspections at locations where access previously had been denied and/or hostile customers were located. Provided safety training presentations for drone vendors and shared lessons learned at Annual Safety Summit.
• Included safety guidelines and de-escalation tips in PSPS crew member training

C3. Results

Compared to Q4 2022, there was a 47% reduction (17 to 9) in customer threats against employees and contractors in Q1 2023. This includes a 37.5% decrease (8 to 5) in customer threats based on property access.

A4. Recommendation 4

•Improve Training for Frontline Workers on New Technologies Related to Wildfire Mitigation

B4. Actions Taken

•Continue delivering REFCL training to frontline workers with enhanced training materials

C4. Results

• Increased understanding of REFCL in pilot locations

Section 4. Supporting Documents

The electrical corporation had the option to submit supporting documentation for the management self-assessment.

No supporting documentation was submitted.

6 Written Comments from SCE

Following are the written comments from SCE dated March 8, 2024, “Southern California Edison Company’s Comments on the Draft 2023 Safety Culture Assessment for Southern California Edison.”

Michael Backstrom
Vice President, Regulatory Affairs
Michael.Backstrom@sce.com

March 8, 2024

Director Caroline Thomas Jacobs
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's Comments on the Draft 2023 Safety Culture Assessment for Southern California Edison

Dear Director Thomas Jacobs:

In response to the February 23, 2024 letter from the Office of Energy Infrastructure Safety (Energy Safety), Southern California Edison Company (SCE) submits these comments on the Draft 2023 Safety Culture Assessment (SCA) report (Draft SCA Report) issued by National Safety Council (NSC) on behalf of Energy Safety in fulfillment of Public Utilities Code Section 8389(d).

INTRODUCTION

As noted in the Draft SCA Report, NSC performed a review that involved a workforce survey, management self-assessment, focus groups, and interviews to support its analysis and recommendations. NSC found that SCE "has exhibited continued growth in safety culture maturity since 2021,"[1] that "focus group participants described SCE as an organization with opportunities to improve but moving in the right direction,"[2] and that "inputs indicated that SCE is succeeding in integrating contractors into SCE's safety culture."[3] In addition, the draft SCA report notes five opportunities for improvement:[4]

1. *Continue to Build SCE's Capacity as a Learning Organization*. SCE should build its capacity as a learning organization. It should take a proactive approach to incorporating feedback to improve organizational processes. It should also take steps to increase workers' psychological safety to improve the quantity and quality of safety event (near-miss and hazard) reports.
2. *Strengthen Safety Communications*. SCE should continue efforts to improve safety communications between leadership and frontline workers.

[1] Draft SCA Report, p. 3.
[2] *Id*.
[3] *Id*.
[4] *Id*, pp. 4, 22-29.

3. *Improve Training for Frontline Workers on Wildfire Suppression and Mitigation Technology.* SCE should increase training for frontline workers on wildfire suppression and the installation and operation of new technologies related to wildfire mitigation, including rapid earth fault current limiter (REFCL) devices.
4. *Mitigate Risk Exposure Posed by Interactions with the Public.* SCE should continue to recognize and take action to mitigate the risk exposure posed by interactions with the public.
5. *Increase Engagement in Workforce Survey.* SCE should increase engagement on the safety culture assessment within the workforce supporting wildfire mitigation initiatives.

With limited exceptions below, SCE generally supports the findings and recommendations in the draft report and appreciates the efforts that Energy Safety and its consultant, NSC, have put into implementing the safety culture assessment process. Below, SCE offers a few proposed changes to the draft report for consideration.

COMMENTS ON THE DRAFT SAFETY CULTURE ASSESSMENT REPORT

I. SCE Proposes That Future Safety Culture Assessments Identify an Appropriate Evaluation Approach and Verify Implementation Actions

Before addressing the specific recommendations in the Draft SCE Report, SCE respectfully offers a proposal for improving the overall assessment process. NSC employed a multi-method approach to conduct the safety culture assessment for SCE, including workforce surveys, a management self-assessment with a summary plan for the coming year, a description of safety culture objectives and a summary of lessons learned, and interviews.[5] The Draft SCA Report does not clarify, however, how the data collected from the assessment was analyzed, triangulated and integrated to develop the overarching recommendations and findings for the report. For example, in several areas of the Draft SCA Report, the examples provided by one or two focus group participants are framed as systemic issues (specific examples are described and discussed in the sections below) notwithstanding the very limited evidence provided. SCE proposes that NSC identify an appropriate triangulation approach to ensure findings and recommendations are grounded in a rigorous, comprehensive integration of all safety culture assessment data points.

An empirically based, comprehensive approach to evaluation is critical to understanding macro themes, an organization's cultural strengths and opportunities, and the effectiveness of safety efforts and safety culture maturity. For example, SCE conducts an independent Safety Culture Assessment that is consistent with empirically valid methods every three years to assess Safety Culture and provide recommended adjustments to Safety Performance improvement efforts. The assessment is conducted by a team of highly trained experts who spend time onsite conducting focus groups, surveys, and interviews. The survey captures qualitative data that is systematically coded and analyzed against 25 dimensions and produces a maturity rating for each dimension. A comprehensive approach is then taken to analyze the inputs from the focus groups, surveys, and interviews and coded qualitative data is analyzed, interpreted, and triangulated to identify key macro themes that reflect strengths and opportunities in safety culture and evaluate the effectiveness of safety efforts and safety culture maturity.

[5] *Id*, pp. 9-10.

II. SCE Supports Continuing to Build Upon Recommendations One and Four

SCE supports continuing to implement Recommendations One and Four as opportunities for further improvement in SCE's safety culture. These recommendations build upon the recommendations from 2022, and there are sufficient efforts underway to successfully meet the verification criteria in this draft Report.

III. SCE Proposes That Recommendation Two Be Modified to Not Expand the Scope Beyond the Intent of Energy Safety's SCA

SCE supports Recommendation Two to "continue to strengthen SCE's safety communications between leadership and frontline workers."[6] The Draft SCA Report recommendation builds upon the recommendation from 2022. The verification method for the 2024 management self-assessment was modified, resulting in a broadened scope beyond the focus of wildfire safety.

SCE emphasizes the importance that the CPUC's safety culture assessment process does not duplicate the annual safety culture assessment conducted by OEIS pursuant to AB 1054. The Draft SCA Report notes "Energy Safety's SCA is not a replacement for ongoing work to improve safety culture at each electrical corporation" and further adds "Energy Safety's SCA specifically focuses on the safety culture present in the wildfire mitigation work setting…"[7] The scope of this assessment should remain focused on wildfire safety, and not expand to encompass broader safety culture efforts.

SCE provides below, in redline, its proposed modification to the language in the verification method for recommendation to limit the focus to wildfire safety:

> "In its 2024 management self-assessment, SCE must provide a description of how it improved safety-related communications with frontline workers regarding wildfire safety and PSPS."

IV. SCE Proposes Modifying Recommendation Three to Limit the Increase of Training Related to Wildfire Mitigation

As part of Recommendation 3, the Draft SCA Report recommends that SCE "should continue to improve its training for frontline workers, particularly concerning wildfire suppression and the installation and operation of new technologies related to wildfire mitigation (e.g., rapid earth fault current limiter [REFCL] devices)."[8] The recommendation builds on a 2022 SCA Report recommendation regarding improving training for front line workers on new technologies related to wildfire mitigation.

The Draft SCA Report highlights that "Focus Group participants also suggested all field workers would benefit from basic wildfire suppression training."[9] But the evidence supporting this sweeping measure is extremely limited and the rationale for requiring SCE to provide such specialized training is flawed. As noted above, the size of the focus group was only 13 individuals—and elsewhere the Draft SCA Report attributes this statement to *just "one focus group member"*.[10] Furthermore, SCE is not a fire suppression agency, and its primary focus appropriately is on preventing ignitions associated with its electrical equipment.

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[6] *Id*, p. 24.
[7] *Id*, p. 6.
[8] *Id*. p.26.
[9] *Id.*
[10] *Id.* p.20.

Nevertheless, SCE provides training on fire extinguisher usage to field personnel and its Standard (attached) requires that certain fire suppression equipment be in place in High Risk Fire Areas and that "The Utility shall…Take reasonable steps to extinguish all such fires that may start…" The Standard further provides that SCE "notify the appropriate emergency response agency immediately or as soon as reasonably possible."[11]

SCE therefore respectfully submits that this recommendation is unwarranted and unnecessary in light of the current training that SCE provides. Wildfire suppression techniques are highly specialized skills outside the scope and responsibilities of a utility worker. Expectations that utility workers expand existing responsibilities to include wildfire suppression could raise significant liability and employment issues. For these reasons, SCE recommends the following modifications to Recommendation 3:

> SCE should continue to improve its training for frontline workers, particularly concerning ~~wildfire suppression and~~ the installation and operation of new technologies related to wildfire mitigation (e.g., rapid earth fault current limiter [REFCL] devices).

Further, the recommendation adds, "SCE should also increase training options to include more hands-on and less computer-based delivery." The Draft SCA Report notes "2023 focus group participants expressed that they would prefer hands-on training for new equipment or tools."[12] SCE interprets "hands-on training" to mean "in person training" or "instructor lead training." SCE's training options for REFCL technologies already includes options for both web-based and instructor led versions.

SCE provides below, in redline, its recommended modifications to the language in Recommendation 3:

> SCE should ~~also increase~~ continue to provide in-person and computer-based training options~~ to include more hands-on and less computer-based delivery~~.
>
> ~~SCE must also provide information on how it trains frontline workers on basic wildfire suppression techniques for all field workers.~~

Lastly, SCE's enhanced its training materials to provide content tailored to a specific audience and equipment type. SCE provides below, in redline, its recommended modification to the language in the Draft SCA report to provide important context to the observation for Recommendation 3:

> "In its 2023 report on its 2022 recommendations, SCE reported that it continued providing training on REFCL using "enhanced training materials" without specifying the nature of the enhancement."[13] SCE conducted in-person training for anyone impacted by the REFCL equipment for each location. Job classifications trained included substation operators, system operators, test technicians, maintenance electricians, apparatus technicians, program writers, lineman, and troubleman. Also onsite were the vendors and technology integration engineers for support.

[11] *See* SCE's "High Fire Risk Area (HFRA) Fire Prevention and Hot Work Restrictions" Standard, p. 12.
[12] *Id*., p. 26.
[13] *Id*.

V. SCE Proposes Removing Recommendation Five and Reconsidering the Schedule and Survey Method for Future Safety Culture Assessments

In 2023, the SCA timeline was provided by Energy Safety in May and was accelerated in an attempt to get the annual SCA process back on schedule for 2024. In addition to the schedule, the survey collection method was also updated to electronic only (versus a paper option in the past) as a requirement in order to meet the accelerated timeline.

SCE met with Energy Safety and NSC in June of 2023 to address questions and concerns regarding the timing of the assessment process and survey collection method. The timeline was insufficient to have demonstrated significant progress for the 2023 report, given the assessment materials were delivered by NSC on June 15, 2023, with the expectation that management self-assessment to be completed by July 7, and the workforce survey administration be completed by July 24. This schedule did not allow for sufficient time to appropriately introduce, explain, and make arrangements for workers to take the survey. SCE field personnel do not have readily available access to company devices (e.g., laptops and cellphones) and SCE emphasized the electronic only survey poses a significant challenge for field survey response rates. Energy Safety and NSC understood and agreed with the concerns, indicating that this would be a "light touch" year, assuring the IOUs will not face consequences due to the outcome of the SCAs. Nevertheless, SCE received a new recommendation in 2023 requiring increased survey participation that did not reflect these concerns, i.e., limited notice, condensed timeline, online only surveys.

SCE proposes to remove the recommendation for 2023 to increase engagement in the workforce survey via the below redlined language:

> "~~SCE must employ a more robust communication strategy that involves senior leadership to promote the survey. It must consider ways to diversify the tactics for soliciting survey responses from the workforce.~~"[14]

CONCLUSION

SCE appreciates the opportunity to submit these comments. SCE also welcomes the opportunity to partner with Energy Safety and other stakeholders in developing criteria for an appropriate evaluation approach for future safety culture assessments.

If you have any questions, or require additional information, please contact me at Michael.Backstrom@sce.com.

Sincerely,

//s//
Michael A. Backstrom
VP Regulatory Affairs
Southern California Edison

[14] *Id*, pp. 28-29.

5. The crew is able to maintain adequate communications (900 MHz, cellular, satellite, etc.) if coverage is available
6. Work vehicle(s) must be equipped, at minimum, with the following standard fire suppression equipment and have it readily available near the work being performed to enable an immediate response to an ignition:
    i. Be equipped with an ABC fire extinguisher (minimum size: 5lbs)
    ii. Shovel shall be size "0" or larger and no less than 46 inches in overall length
    iii. Axe/Pulaski shall have 2-1/2 pound or larger head and be no less than 28 inches in overall length
    iv. Filled Water backpack (minimum size: 5 gallons)

AND:

7. All switching operations shall comply with System Operating Bulletin 322 (SOB 322)

***Protected area may be adjusted to account for wind or other environmental/site conditions as deemed necessary by foreman/site lead to ensure appropriate ignition mitigation.*

In the unique situations in which not all mitigation measures can be met, work with the Site Lead or Supervisor to confirm adquete measures are in place to reduce the risk of igntions.

Vegetation Management contractors shall also adhere to their approved SCE Contractor Hazard Assessment and Safety Plan, which provide additional mitigation measures and requirements specific to their work scope and activities.

Additionally, all field work performed within the boundaries of the United States Forest Service (USFS) shall comply with the USFS Master Special Use Permit and Operations and Maintenance Plan Appendix "F" (Fire Plan), which outlines responsibilities for fire prevention and extinguishment of fires that inadvertently start from utility operations and maintenance (O&M) activities on forest lands. The provisions in the Fire Plan also specify conditions under which O&M activities are authorized to occur, identify a system for determining fire risk, and detail conditions under which O&M activities will be curtailed or shut down. Lastly, SCE employees and contractors shall comply with all applicable federal, state, and local fire safety regulations.

3.2.3 Hot Work Activities in National Forest Service (NFS) Lands

SCE Environmental Affairs maintains an Operations and Maintenance Plan for Electric Facilities with the National Forest Service. Before conducting any hot work in NFS lands, review the Appendix B – Fire Plan in its entirety.

While conducting hot work within the National Forest Service Lands, you are required to abide by the NFS Project Activity Level (PAL) requirements and restrictions. SCE's Forestry group sends an email daily that includes the PAL activity level. You can also obtain the PAL activity level by contacting NFS see Table 2 – PALS Contact List. After 4pm, the PAL will be updated for the following day.

Review the PAL and abide by all provided restrictions or requirements based on the type of work being conducted. All exceptions require changes to be in writing to the Forest Service Administrator for approval, include details of any substitute precautions SCE will take to reduce the risk of ignition.

Standard Tools Required by NFS:
Per California Public Resources Code PRC 4427, 4428, and 4431 the utility shall furnish and have available the following emergency use hand tools and/or equipment:

- **a.** Be equipped with an ABC fire extinguisher (minimum size: 5lbs)
- **b.** Shovel shall be size "0" or larger and no less than 46 inches in overall length
- **c.** Axe/Pulaski shall have 2-1/2 pound or larger head and be no less than 28 inches in overall length
- **d.** Filled Water backpack (minimum size: 5 gallons)

3.3 Restrictions During Elevated and Extreme Fire Weather Threat Conditions (PSPS Events)

During elevated or extreme fire weather threat conditions, SCE's incident commander may elect to activate an incident management team (IMT) to oversee its Public Safety Power Shutoff (PSPS) protocol. Special precautions must be taken during these events as vegetation will be particularly susceptible to ignition and a resulting fire could be difficult to suppress.

When working on or near circuits under consideration for or de-energized due to a PSPS event, all non-emergency work involving hot work activities on such circuits should be cancelled during the period of concern and subsequently rescheduled when conditions improve. Emergency work (remediating conditions that represent immediate threats to public safety, electric reliability, or property) may only be performed if the mitigation practices outlined in section 3.2.2 are met. These restrictions shall apply to all SCE employees and contractors working in the areas of concern.

Note: *If there are changes to the forecast and circuits are added to the PSPS monitoring list with a period of concern that is concurrent to hot work activities being performed, work must be safely stopped. Requested exceptions shall be provided to the PSPS IMT incident commander for review and approval along with the appropriate justifications and described mitigations. The crew foreman or site lead is responsible for ensuring adherence to these guidelines at all times, including situational awareness of HFRA boundaries and any current PSPS event activity.*

Exceptions to the restrictions/mitigations:

a. If the hot work is confined to an area devoid of flammable or combustible materials (e.g., parking lot, commercial area, irrigated/maintained agricultural lands, bare mineral rock/earth, work indoors,etc.)
OR
b. If it is actively raining or has recently rained, and the ground / vegetation near the work area is saturated during hot work activities (reassessment required if rain ceases and fuels begin to dry out)
OR
c. Work that does not have the potential to generate arcs, sparks, flames or high-heat sources and cannot ignite a fire
OR
d. When a circuit is de-energized due to PSPS and repairs to any identified priority notifications are needed, work may be performed to conduct such repairs so long as the remediation activities do not have the possibility of causing an ignition

3.4 Red Flag Warnings & Fire Weather Watches

SCE participates with the California Department of Forestry and Fire Protection (CAL FIRE), California Office of Emergency Services (Cal OES), U.S. Forest Service (USFS), National Weather Service (NWS), and various city and county fire agencies in the Red Flag Fire Prevention Program.

Red Flag Warnings (RFW) utilizes available CAL FIRE forces, cooperating fire agencies, utilities, citizens groups, and news media to inform the general public of the potential for major wildland fires and the need to be aware and exercise fire safe practices to lessen the damage and loss to California's watershed, resources, life, and property. A RFW is issued by the National Weather Service when critical weather patterns develop that create the potential for large, dangerous wildland fires. Fire agencies pre-deploy personnel and equipment in high fire hazard areas to spot and extinguish fires in their incipient stage. Non-fire agency personnel serve as lookouts, able to spot fires in the incipient stage and quickly notify fire agencies to respond. The presence of "Red Flag Fire Patrol" vehicles serve as a deterrent to arsonists.

Fire Weather Watch - *(No Action Required – Advisory Only)* - Is issued to advise user agencies of the possible development of red flag conditions in the near future, generally the next 24 to 72 hours. Under certain conditions a watch can be issued for the first 12 hours.

Red Flag Warning (RFW) - *(Upon SCE receiving notification of a Red Flag Warning: SOB-322 is put into effect for the affected county/counties)* - Is issued to advise user agencies of the occurring or imminent red flag conditions, generally within the next 12 to 24 hours.

Red Flag Criteria - Red flag events normally require the combination of critical fuel conditions and critical weather conditions. Several combinations of fuels and weather conditions may combine to produce red flag conditions. Fuel conditions are considered critical when fuel characteristics are favorable for large fire growth, as determined by the land management agencies. NWS forecasters determine when weather conditions are critical.

Primary Red Flag Criteria for Southern California (except High Desert Region)
A red flag warning could be issued if the following 3 criteria are forecasted / expected for a period of at least 3+ hours.

a. The Southern California Geographic Area Coordination Center (OSCC) forecasts area(s) as 'Very Dry' *(Low/Moderate risk of large fires in the absence of a "high risk" event)* on their Significant Fire Potential map

AND

b. Relative humidity (RH) of 15% or less

AND

c. Sustained winds of 20 mph or greater or gusting to 35 mph or greater

Primary Red Flag Criteria for High Desert Region
A red flag warning could be issued if the following criteria are forecasted / expected for a period of at least 6+ hours.

a. The Southern California Geographic Area Coordination Center (OSCC) forecasts area(s) as 'Very Dry' *(Low/Moderate risk of large fires in the absence of a "high risk" event)* on their Significant Fire Potential map

AND

b. Relative humidity (RH) less than 15%

AND

c. Gusting winds 35 mph or greater

OR

d. Dry lightning event (Thunderstorms, isolated or greater in coverage (i.e. GTE 15%) are forecast to develop and produce little or no rain (<0.10") over the fire weather zone. Death Valley does NOT REQUIRE Red Flag Warnings for dry lightning.)

Contributing Red Flag Factors:

a. First significant lightning occurrence after a hot and dry period. This includes "wet" or "dry" thunderstorms, widely scattered (15%) coverage or more. After a hot and dry period, the first occurrence of thunderstorms can readily start wildfires. The RH does not need to meet the criteria listed above.
b. Significant cold frontal passage, expected to cause strong sustained and gusty winds, and an abrupt wind shift. Of heightened concern are dry cold fronts that have the above characteristics, but little or no rainfall, and expected when there are on-going wildfires or prescribed burns. The RH does not need to meet the criteria listed above.
c. Any combination of weather and fuels conditions that would create a critical fire control situation or extensive wildfire outbreak. These may include: long term drought, much higher than normal maximum temperatures coupled with very low humidity, low fuel moisture, poor nighttime RH recovery, high Energy Release Component (ERC) or Burning Index (BI), a Haines Index of 5 or 6, etc.

Prevention Measures:

When a Red Flag Warning is issued for your operating area, county, and/or district, the following prevention measures should be implemented:

1. Display the "Red Flag Fire Patrol" sign on designated SCE vehicles. *(not applicable to contractor or rental vehicles)*
2. When working in High Fire Risk Area (HFRA) during a RFW, all work (both emergency and non-emergency) should only be performed if:
    i. Under the direct observation of the crew foreman or site lead
    AND
    ii. The crew is able to maintain adequate communications (900 MHz, cellular, satellite phone, etc.)
    AND
    iii. The crew has the standard fire suppression equipment deployed and in the immediate area of the work being performed that would facilitate an immediate response to an ignition (shovel, axe/Pulaski tool, water backpack, ABC fire extinguisher etc.)
    AND
    iv. Local weather conditions, terrain, and surrounding vegetation would permit the crew to extinguish a fire resulting from the work being performed
3. The opening of remote controlled air break pole switches (RTS, RCS) are (when possible) performed under visual observation to watch for abnormalities
4. Be on alert for fires or possible fires while working in or passing through fire hazard areas
5. Fires are accurately reported to the appropriate switching center or control center as soon as possible. Reporting of fires or potential fires as follows:
    i. Transmission and Distribution employees will notify the local switching center
    ii. Generation employees will notify the local Generation Dispatch
    iii. Information Technology employees will notify the Telecommunications Control Center
    iv. Corporate Real Estate employees will notify the Edison Security Operations Center

v. Generation Dispatch, Telecommunication Control Center, and ESOC will log all reported fires and/or potential fires and will notify the Watch Office.

Ensure you have identified your required contact(s) and have the most up-to-date phone number(s).

3.5 Primary and Secondary Line Work and Switching

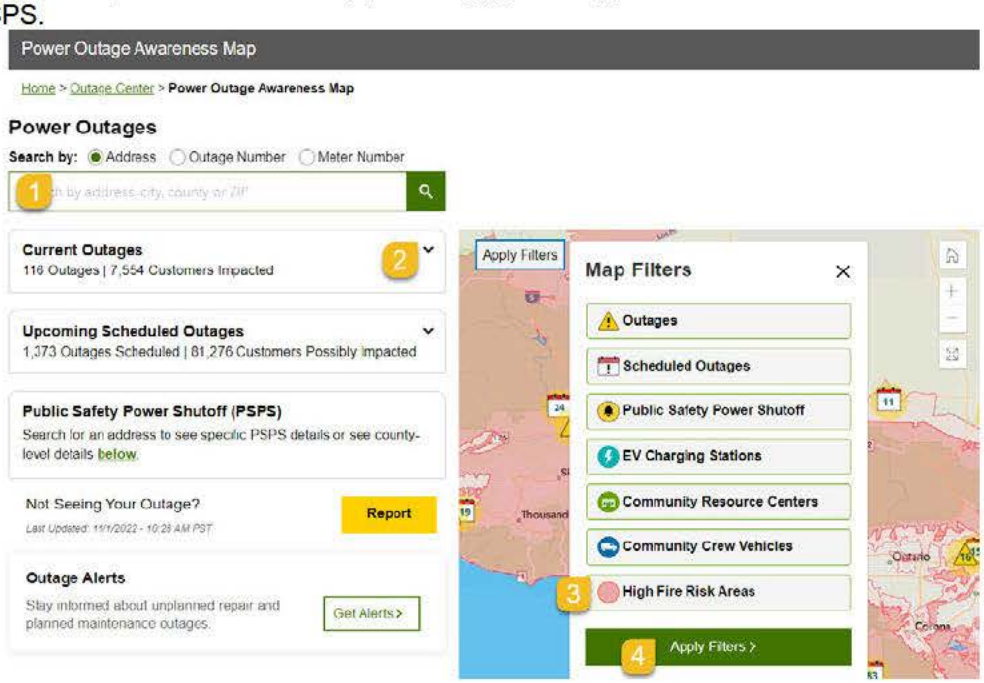
Although primary and secondary line work and switching are generally not considered traditional hot work activities, field crews should be prepared for the unexpected, such as accidents and/or equipment malfunction that could generate sparks or incandescent particles. Mitigations outined in section 3.2.2, with the exception of number 4, shall be in place when performing the following line work and switching activities in HFRA.

a. Manual operation of energized electrical devices
b. Energizing or de-energizing lines or equipment
c. Opening or closing taps or fuses on energized electrical equipment
d. Clearing foreign objects/vegetation in contact with energized lines
e. Installing or removing protective covers on energized lines or equipment
f. Working on energized secondaries or services

Note: *Mitigation number 4 of section 3.2.2 should be implemented if activities are expected to generate sparks or incandescent particles.*

3.6 How to Identify HFRA and Circuits Subject to PSPS

Maintaining situational awareness about which areas are considered high fire risk and subject to PSPS is a critical part of this program. Navigate to SCE's public "Power Outage Awareness Map" where you can enter the nearest address (1) in order to determine if you are in a HFRA or working (or planning to work) on a circuit under consideration for or de-energized due to PSPS. Click on the 'Apply Filters' (2) widget on the interactive outage map, select 'High Fire Risk Areas' (3), and 'Apply Filter' (4) to see if the area of concern is in HFRA or subject to PSPS.



4.0 DEFINITIONS

CPUC: California Public Utilities Commission
HFRA: High Fire Risk Area (Utility Designated)
HFTD: High Fire-Threat District (Official CPUC Designations)
Hot Work: is any work that utilizes tools that have a potential to spark or cause an ignition such as grinding, sawings, welding, etc.
NFS: National Forest Service
PAL: Project Activity Level
PSPS: Public Safety Power Shutoff
RFW: Red Flag Warning
SOB: System Operating Bulletin referred to as SOB322 for HFRA
USFS: United States Forest Service

5.0 IMPLEMENTATION DOCUMENTS

Accident Prevention Manual
Contractor Safety Portal, Fire Prevention-Folder
Frequently Asked Questions (FAQ)
Health and Safety Handbook for Contractors

6.0 REFERENCES

External References
National Weather Service Red Flag Program: https://www.wrh.noaa.gov/vef/caFireCriteria.php
Power Outage Awareness Map: https://www.sce.com/outage-center/check-outage-status
USFS Appendix F Fire Plan

Internal References
Fire Prevention Plan
Fire Prevention Implementation Plans
Hot Work Standard
Hot Work Site Specific Implementation Plans
SOB322 Bulletins

7.0 KEY CONTACTS

- Technology & Initiative Management, Wildfire Operations: [redacted]

High Fire Risk Area (HFRA) Fire Prevention and Hot Work Restrictions

Approved by _____ **Date:** 7/12/2023

Approved by _____ **Date:** 7/12/2023

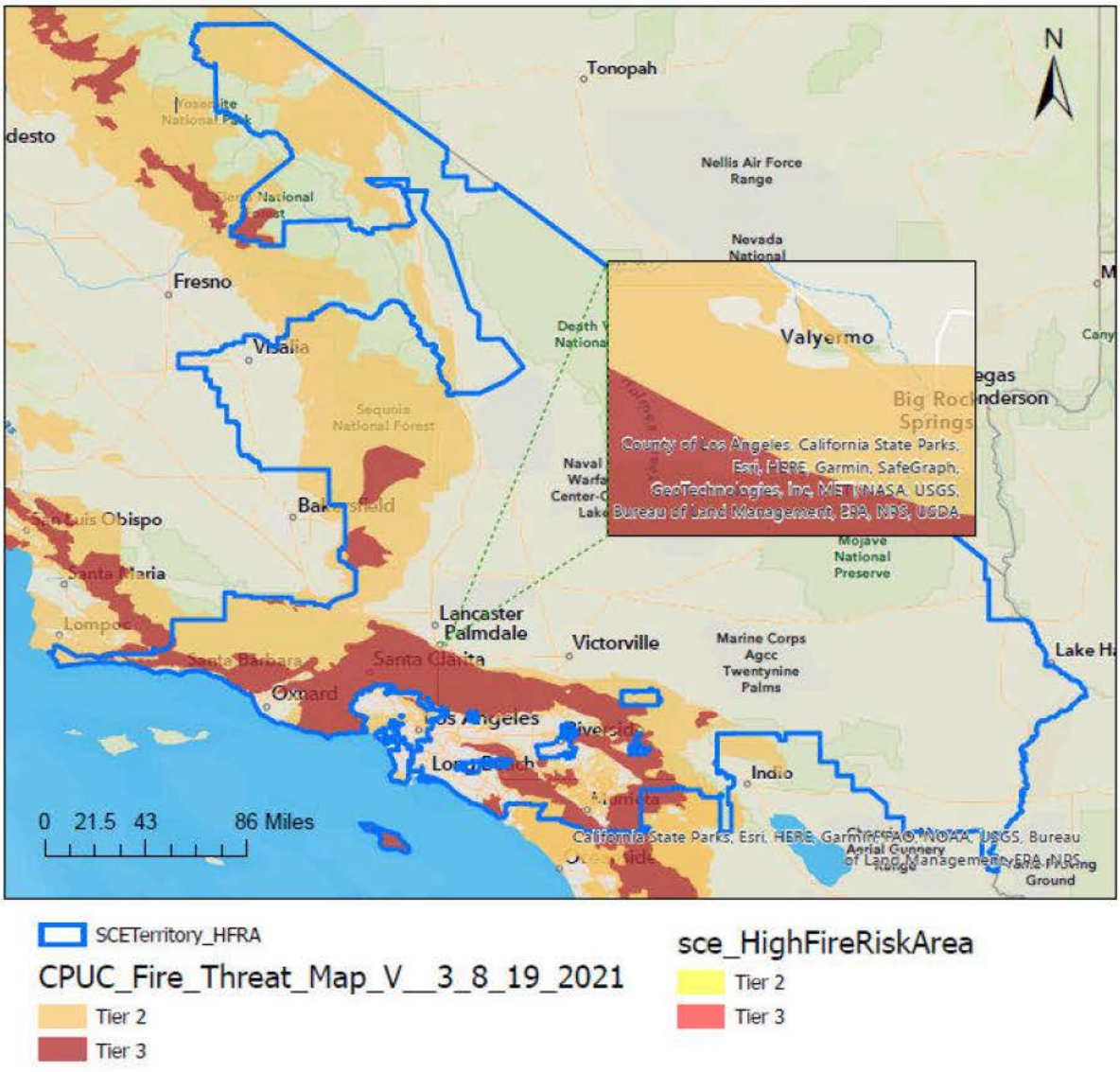
[redacted]

Revision History

Rev	Date	Description of Revision	Contact
0	7/12/2023	Initial Version	[redacted]
1.0	7/20/2023	Updated Header	
2.0	7/31/2023	Corrected section 3.5	

Appendix A – 2022 HFTD vs HFRA Map

As of 2022, there is, 1% difference between HFTD and HFRA which consists of a small buffer around the HFTD boundaries.



Appendix B - Recommended Fire Prevention Practices for Job Tailboards

Tailboards are a critical first step to ensure all supervisors and members of each crew involved in a job thoroughly understand the work to be performed and the method of accomplishing it in a safe manner. Before the start of each job, or in the event the scope of the job changes, every supervisor/job lead shall call their crew together and outline the proper work procedures/methods, roles and responsibilities, and possible hazards to conduct the work safely and minimize the risk of an ignition.

Below you will find a collection of best practices from CAL FIRE's Fire Prevention Field Guide, USFS Operations and Maintenance Plan for Electric Facilities, and other sources that can be used during the job tailboard when covering fire hazards and mitigations specific to the work being performed and job location.

- Select tools in good working order and work methods that minimize or eliminate arcs/sparks, if possible
- Select tools with mechanisms that do not create sparks or excessive heat when in use (e.g., hydraulic cable/bolt cutters) and avoid those that do (e.g., reciprocating saw)
- If arcs/sparks are unavoidable, ensure the work area is wet down as required and utilize fire/welding blankets for added protection from heat sources
- Designate a Fire Watch, a person responsible for observing the hot work, monitoring conditions to ensure that a fire does not occur, stopping work if unsafe conditions develop, and immediately responding should an ignition occur
- Designate a Swamper, a person responsible for keeping the ground wet under the hot work location as needed throughout the job
- Fire suppression tools and equipment should be always kept directly accessible to workers
- Carefully assess the terrain, vegetation, and access routes around and leading to the job location for hazards that may prevent the suppression of an incipient stage fire
- Ensure fire extinguishers are fully charged, water backpacks are full, and batteries are charged (if using battery powered sprayers)
- Ensure an adequate supply of water is available based on job size/type to ensure the area is wet down appropriately throughout the day and water backpacks remain full
- Periodically inspect fire suppression equipment and tools to ensure they are in good repair and can be relied upon when needed
- Road grading or heavy brush removal requiring the use of heavy equipment should have a fire plan specific to the location and job objectives
- Mowing brush and small ingrowth trees to maintain previously cleared corridors should have a spotter in front of the mowing path to ensure rocks and other debris are removed prior to clearing
- If using gasoline-powered equipment, regularly check the spark arrestor to ensure carbon and/or oil buildup is removed and there are no holes in the arrestor screen
- When refueling equipment: Allow the equipment to cool for at least 5 minutes, only refuel over anon-combustible surface or approved fire barrier, SLOWLY open fuel tank to release pressure, and cease hot work during refueling; never rest hot equipment down on dry fuels
- Smoking is not permitted except in a barren area or in an area cleared to mineral soil at least 3 feet in diameter (PRC 4423.4)

Appendix C – Fire Plan

F.1 Scope

The provisions below outline the Utility's responsibility for fire prevention and extinguishment of fires that inadvertently start from Utility operations and maintenance (O&M) activities within the Pacific Southwest Region (Region 5) of the U.S. Department of Agriculture, Forest Service (Forest Service). The provisions in this Fire Plan also specify conditions under which O&M activities are authorized to occur, identify a system for determining fire risk, and detail conditions under which O&M activities will be curtailed or shut down.

F.2 Responsibilities

The Utility shall:

- Abide by the requirements of this Fire Plan for the duration of the master permits and easements (MPEs) issued by the Forest Service.
- Take all steps necessary to prevent its employees, its subcontractors, and its subcontractors' employees from starting fires when conducting O&M activities.
- Take reasonable steps to extinguish all such fires that may start and to notify the appropriate emergency response agency immediately or as soon as reasonably possible.
- Permit and assist in periodic testing and inspection of required fire equipment, including requiring contractors to test and inspect their equipment.
- Demonstrate compliance with all applicable fire activity requirements as defined in this Fire Plan during each local Forest's established Fire Precautionary Periods.
- Share and confirm emergency contact information for the Utility, the Forest Service, and any other fire response agencies as needed or at the Utility's annual meeting with each Forest
- Comply with each Forest's Project Activity Level (PAL) activity and use restrictions.

The Forest Service may conduct periodic field inspections for compliance with the Fire Plan. The number, timing, and scope of such inspections will be at the discretion of Forest Service employees responsible for permit administration. Such inspections do not relieve the Utility of responsibility for correcting violations of the Fire Plan or for fire safety in general, as outlined above.

F.3 Definitions

F.3.1 Fire Patrol Person

The fire patrol person is a member of the work crew assigned the responsibilities for fire prevention and fire risk mitigation on the job site. Under certain PALs, the fire patrol person is required for U.S. Forest Service Appendix F Fire Plan mechanical operations from cessation of operations until 2 hours after operations cease or sunset, whichever occurs first.

F.3.2 Fire Precautionary Periods

Fire Precautionary Periods will be specified by each Forest and may change annually based on the weather conditions and other factors. The Utility will comply with the Fire Plan's regulations, requirements, measures, and activities during the Fire Precautionary Period. The Fire Precautionary Period will cease upon the Forest's declaration of the end of fire season, if applicable.

F.3.3 Fire Supervisor

The Fire Supervisor is the designated Utility point of contact responsible for communicating fire-related information between the Forest and the Utility work crews.

F.3.4 Hot Saw
A hot saw is a harvesting system that uses a high-speed (>1,100 revolutions per minute) rotating felling head (i.e., full rotation lateral tilt head).

F.3.5 Mechanical Operations
Mechanical operations describe the process of felling, skidding, chipping, shredding, masticating, piling, log processing, and/or yarding that requires the use of motorized power tools, such as chainsaws, chippers, motorized carriages, masticators, stroke delimbers, skidders, loaders, and dozers.

F.4 Project Activity Level
The PAL is a decision support tool designed to help fire and timber resource managers establish the level of industrial precaution for the following day. This tool utilizes outputs from the National Fire Danger Rating System, the accepted interagency fire danger model that represents the interaction between fuels, weather, topography, and fire occurrence. The PAL is designed to reduce the risk of large, damaging wildfires and the legal vulnerability of the Forest Service, its contractors, and permittees.

Any work being conducted on National Forest Service (NFS) lands must be in compliance with the applicable PAL restrictions and activity requirements, as described in Table F-1. The Utility shall conform to the limitations or requirements of the PAL obtained from the Forest before starting work each day. If practicable, the Forest will determine the following day's activity level by 4:00 p.m. local time each afternoon. The Utility can obtain the PAL for the following day by calling the phone number associated with the applicable Forest, as provided in Attachment F-1 Project Activity Level Contact List after 4 p.m. The Forest may change the PAL at any time if the fire danger is higher or lower than predicted and the change is consistent with forest management objectives. The Forests have the discretion to decide when to change the PAL and to what level, and how weather observations should be used to determine the appropriate PAL.

The Utility and the Forests may agree to a variance for operations at levels B, C, D & Ev. When approved by a Forest Supervisor or delegated Forest Service staff specified by the Forest, a Variance Agreement can be implemented when the criteria specified in the agreement are met and the necessary fire activity requirements are in place. This approval is good for 10 calendar days unless cancelled sooner or extended by the Forest Supervisor or designated representative for an additional 10 calendar days. Variance approval can be withdrawn at the sole discretion of the Forest. The Forest will specify to the Utility the information necessary to make a variance request.

F.5 Tools, Equipment, and Restrictions
Tool and equipment specifications for fire prevention and suppression are described below. Unless waived in writing, the Utility shall comply with the following requirements at all times.

F.5.1 Standard Tools
For each piece of equipment used for O&M activities, the Utility shall furnish and have available the following emergency use hand tools and/or equipment (see California Public Resources Code PRC [PRC] 4427, 4428, and 4431):

- One shovel, one axe (or Pulaski) and a fully charged chemical or compressed air foam fire extinguisher Underwriters Laboratories minimum rating of 2A:10-B:C, on each truck, personnel vehicle, tractor, grader, and other heavy equipment.

- At least one 4A:80-B:C fire extinguisher or equivalent on each mechanized harvesting machine with hydraulic systems, powered by an internal combustion engine (e.g., chipper, feller/buncher, harvester, forwarder, stroke delimber).
- One shovel and one filled 5-gallon or larger backpack-pump type fire extinguisher with hand pump with each welder.
- One shovel and one 16-ounce or larger pressurized chemical fire extinguisher when using gasoline-powered tools, including but not restricted to, chain saws, soil augers, and rock drills. Fire tools shall at no time be farther from the point of operation of the portable gasoline- powered tool than 25 feet with unrestricted access for the operator from the point of operation. Fire extinguishers shall be a standard multi-use extinguisher unless otherwise specified. The shovel must be kept on hand when chain saws are used off cleared landing areas.

All tools and equipment required above shall be in good workable condition and shall meet Forest Service requirements for fire tools as follows:

- Shovels shall be size "O" or larger and no less than 46 inches in overall length.
- Axes (or Pulaski) shall have 2-1/2 pound or larger heads and be no less than 28 inches in overall length.

Concentrations of wood dust and debris shall be removed from all equipment daily or more frequently as required. Standard tools must be kept directly accessible to workers at all times when engaged in work activities described in this Fire Plan.

F.5.2 Spark Arrestors

All diesel and gasoline-operated engines, both stationary and mobile, and all flues used in O&M activities shall be equipped with spark arresters that meet current Forest Service standards set forth in the applicable Forest Service manuals and guidance, including FSM 5100—Fire Management and the San Dimas Technology & Development Center Spark Arrestor Guide. Spark arresters are not required on equipment powered by exhaust-driven turbo-charged engines or on motor vehicles equipped with a maintained muffler, as defined in California PRC 4442 and 4443.

F.5.3 Water Tank Truck/Trailer

The Utility is required to furnish a water tank truck or trailer on-site or within 0.25 mile to work areas during some fire danger conditions where bulldozers, masticators, or other heavy equipment are planned for use1. The water tank truck or trailer must be in good working order and must contain and meet the following minimum specifications:

- At least 300 gallons of water.
- A combination straight stream-fog nozzle with a discharge rating of 6 to 20 gallons per minute. The closed nozzle must be capable of withstanding 200 pounds per square inch (psi) pump pressure without leaking, slipping of couplings, distortions, or other failures.
- 100 feet of 1-inch fire hose, with no segment longer than 50 feet.
- A pump capable of delivering at least 23 gallons per minute at 175 psi at sea level equipped with a discharge pipe having 1.5-inch National Standard Fire Hose thread.
- A power unit for the pump with fuel for at least 2 hours of operation, with ample transport available for immediate and safe movement of the tank over roads serving the work areas.

F.5.4 Welding or Metal Cutting

Prior to initiating any welding or metal cutting, the Utility will obtain and comply with any local welding or other applicable, nondiscretionary permits or approvals needed to conduct the work.

The Utility shall confine all welding or metal cutting activity to cleared areas with a minimum radius of 10 feet measured from the place of welding and, depending on the assigned PAL, may need to utilize a welding tent or metal shield to deflect sparks. A 30-minute fire watch is required after completion of all hot work.

F.5.5 Smoking and Fire Rules

The Utility should adhere to each Forest's smoking and fire rules. The Utility will not permit smoking during fire season, except in a barren area or in an area cleared to mineral soil at least 3 feet in diameter (PRC 4423.4). The Utility shall sign designated smoking areas. The Utility will post signs regarding smoking and fire rules in conspicuous places for all employees to see. The Utility's supervisory personnel should require compliance with these rules. Under no circumstances should smoking be permitted during fire season while employees are operating light or heavy equipment or are walking or working in grass or woodlands.

If only hand equipment is used a full, functioning backpack pump per crew may be substituted.

F.5.6 Utility Fire Contacts

The Utility shall coordinate with the Forest to obtain and confirm emergency contact information and verify emergency reporting procedures, including providing Utility fire contacts for each project or planned work activity. The Utility and Forest shall also confirm PAL contact/recording information where work is anticipated. The Utility shall identify and make known to the Forest a qualified Fire Supervisor as defined in this Fire Plan each operating day when PAL B or higher is in effect. The Fire Supervisor shall ensure clear and open communication between the Utility and the Forest Service regarding any changes in fire condition, incidents, or other fire-related information.
When required according to work activity and the PAL, the Utility shall designate a fire patrol person whose sole responsibility shall be to patrol the job site for prevention and detection of fires; take suppression action where necessary; and notify the Fire Supervisor and Forest as required of any changes in fire condition, incidents, or fires. The designated fire patrol person is required to be on foot unless other agreements have been made. Prior to commencing work, the Utility shall identify and make available the designated Fire Supervisor and Fire Patrolperson's contact information.

F.5.7 Reporting Fires

The Utility will notify the Forest Service of any fires in work areas or along roads used by the Utility immediately or as soon as reasonably possible. The Fire Supervisor shall report all fires as soon as possible to the Forest Service facilities and/or personnel listed in Attachment F-1. When reporting a fire, the Utility shall provide the following information:

a. Name
b. Call-back telephone number
c. Project name (if applicable) or Utility job number
d. Location: legal description (township, range, section) or GPS coordinates and a descriptive location or local reference point
e. Fire information, including approximate number of acres, rate of spread, and wind conditions

F.5.8 Investigation of Utility Related Fires

The Utility agrees to engage in mutual cooperation with the Forest Service on all fire investigations.

F.5.9 Communications

The Utility shall furnish an agreed-upon communication system connecting each operation with the designated Forest Service Dispatch Center. The communications system shall be capable of contacting the designated Forest Service Dispatch Center within 15 minutes of discovery of a fire in the Utility's work area. The communications system shall be

operable during the duration of all O&M activities. The individual responsible for communications must understand how to operate this device and possess it on his/her person at all times or be within a reasonable distance for access.

F.5.10 Clearing of Fuels from Equipment Areas
Welding equipment and stationary log loaders, yarders, and other equipment listed in California State Law shall be cleared of all fuels and logging debris for a slope distance of at least 10 feet.

F.5.11 Storage and Parking Areas
Equipment service areas, parking areas, and gas and oil storage areas shall be cleared of all flammable material for a radius of at least 10 feet unless otherwise specified by the local administrative unit. Small mobile or stationary internal combustion engine sites shall be cleared of flammable material for a slope distance of at least 10 feet from such engine. The appropriate project personnel shall approve such sites in writing.

F.5.12 Oil Filter and Glass Jugs
The Utility shall remove all oily rags and used oil filters from NFS land. The Utility shall prohibit the use of glass bottles and jugs during O&M activities.

Table 1 - Activity Requirements and Restrictions by Project Activity Level

Work Activity	Project Activity Level					
	A	B	C	D	EV	E
Diesel and gasoline operated engines	Standard tools	Standard tools	Standard tools • A properly installed spark arrestor on all equipment	Standard tools • A properly installed sparkarrestor on all equipment	Standard tools • A properly installed sparkarrestor on all equipment • Designated fire patrol person	Activity not permitted
Chipping	Standard tools	Standard tools	Standard tools • At least two fully charged 2A:10B:C fire extinguishers per chipper • Area must be sufficiently wet down	Standard tools • Area must be sufficiently wetdown • Designated fire patrol person • A water tank or truck onsitewith at least 300 gallons of water and a fire hose	Activity not permitted	Activity not permitted
Welding or metal cutting (hot work)	Standard tools • Minimum clearance of 10-footradius around welding point • Designated fire patrol person	Standard tools • Minimum clearance of 10-footradius around welding point • Area must be sufficiently wet down • Designated fire patrol	Standard tools • Minimum clearance of 10-footradius around welding point • Area must be sufficiently wet down • Designated fire patrol person	Activity not permitted	Activity not permitted	Activity not permitted

		person	• Welding tent, blankets, or metal shield must be used			
Road maintenance	Standard tools	Standard tools	Standard tools • Designated fire patrol person	Standard tools • Designated fire patrol person	Activity not permitted	Activity not permitted
Chainsaw operations (sparkarrestors required)	Standard tools • One 5-gallon backpack-pump-type fire extinguisher • Assign a spotter/swamper during operations • A properly installed spark arrestor on all equipment	Standard tools • One 5-gallon backpack-pump-type fire extinguisher • Assign a spotter/swamperduring operations • A properly installed spark arrestor on all equipment	Standard tools • One 5-gallon backpack-pump-type fire extinguisher • Assign a spotter/swamper during operations • A properly installed spark arrestor on all equipment	Standard tools • One 5-gallon backpack-pump-type fire extinguisher • Assign a spotter/swamperduring operations • A properly installed sparkarrestor on all equipment • Designated fire patrol person	Standard tools • One 5-gallon backpack-pump-type fire extinguisher • Assign a spotter/swamper during operations • A properly installed sparkarrestor on all equipment • Designated fire patrol person • A water tank or truck onsitewith at least 300 gallons of water and a fire hose	Activity not permitted
Vegetation clearing	Standard tools	Standard tools • One 5-gallon backpack-pump-type fire extinguisher	Standard tools • One 5-gallon backpack-pump-type fire extinguisher	Standard tools • One 5-gallon backpack-pump-type fire extinguisher	Activity not permitted	Activity not permitted

			• Designated fire patrol person	• Designated fire patrol person		
Refueling	Equipment may be refueled after cooling and in an area with at least 10 feet of clearance	Equipment may be refueled aftercooling and in an area with at least 10 feet of clearance	Equipment may be refueled aftercooling and in an area with at least 10 feet of clearance	• Equipment may be refueledafter cooling and in an area with at least 10 feet of clearance • Designated fire patrol person	• Equipment may be refueledafter cooling and in an area with at least 10 feet of clearance; • Designated fire patrol person • A water tank or truck onsitewith at least 300 gallons of water and a fire hose	Activity not permitted
Hazard tree work	Standard tools	Standard tools • One 5-gallon backpack-pumptype fire extinguisher	Standard tools • One 5-gallon backpack-pumptype fire extinguisher • Designated fire patrol person	Standard tools • One 5-gallon backpack-pump-type fire extinguisher • Designated fire patrol person • A water tank or truck onsite with at least 300 gallons of water and a fire hose	Activity not permitted	Activity not permitted
Skidding / yarding	Standard tools • Area must be sufficiently wet	Standard tools • Area must be sufficiently wet	Standard tools • Area must be sufficiently wet down	Standard tools • Area must be sufficiently wet down	Standard tools • Area must be sufficiently wet down	Activity not permitted

	down • A water tank or truck onsite with at least 300 gallons of water and a fire hose	down • A water tank or truck onsite with at least 300 gallons of water and a fire hose • Wet down surrounding areas	• A water tank or truck onsite with at least 300 gallons of water and a fire hose • Wet down surrounding areas • Designated fire patrol person	• A water tank or truck onsite with at least 300 gallons of water and a fire hose • Wet down surrounding areas • Designated fire patrol person	• A water tank or truck onsite with at least 300 gallons of water and a fire hose • Wet down surrounding areas • Designated fire patrol person	
Blasting	Standard tools • Area must be sufficiently wet down • Designated fire patrol person	Standard tools • Area must be sufficiently wet down Designated fire patrol person	Standard tools • Area must be sufficiently wet down • Designated fire patrol person • A water tank or truck onsite with at least 300 gallons of water and a fire hose	Standard tools • Area must be sufficiently wet down • Designated fire patrol person • A water tank or truck onsite with at least 300 gallons of water and a fire hose	Activity not permitted	Activity not permitted

Table 2 – PAL Contact List

National Forest	PALS Dispatch Number
Angeles	[redacted]
Cleveland	[redacted]
Eldorado	[redacted]
Inyo	[redacted]
Lassen	[redacted]
Los Padres	[redacted]
Mendocino	[redacted]
Plumas	[redacted]
San Bernardino	[redacted]
Sequoia	[redacted]
Shasta – Trinity	[redacted]
Sierra	[redacted]
Six Rivers	[redacted]
Stanislaus	[redacted]
Tahoe	[redacted]

nsc