



March 22, 2024

Heath Holt  
Health, Safety, and Environmental Manager  
LS Power Grid California  
1122 S. Capital of Texas Hwy, Suite 100  
Austin, TX 78746  
[hholt@lspower.com](mailto:hholt@lspower.com)

**Subject: 2023 Safety Culture Assessment for LS Power Grid California**

Mr. Holt:

Enclosed is the 2023 Safety Culture Assessment (SCA) for LS Power Grid California (LS Power) 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 through Public Utilities Code section 8389(d)(4).

On February 23, 2024, Energy Safety provided LS Power with a draft of its 2023 SCA for factual review. LS Power did not submit a response.

LS Power 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 LS Power submitting a letter to this effect to the 2023 Safety Culture Assessments docket (Docket #2023-SCAs).<sup>1</sup>

Sincerely,

A handwritten signature in black ink, appearing to read "Suzie Rose".

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

---

<sup>1</sup> [2023 Safety Culture Assessments \(SCAs\) docket](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-SCAs)

(<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-SCAs>, accessed February 23, 2024).



OFFICE OF ENERGY  
INFRASTRUCTURE  
SAFETY

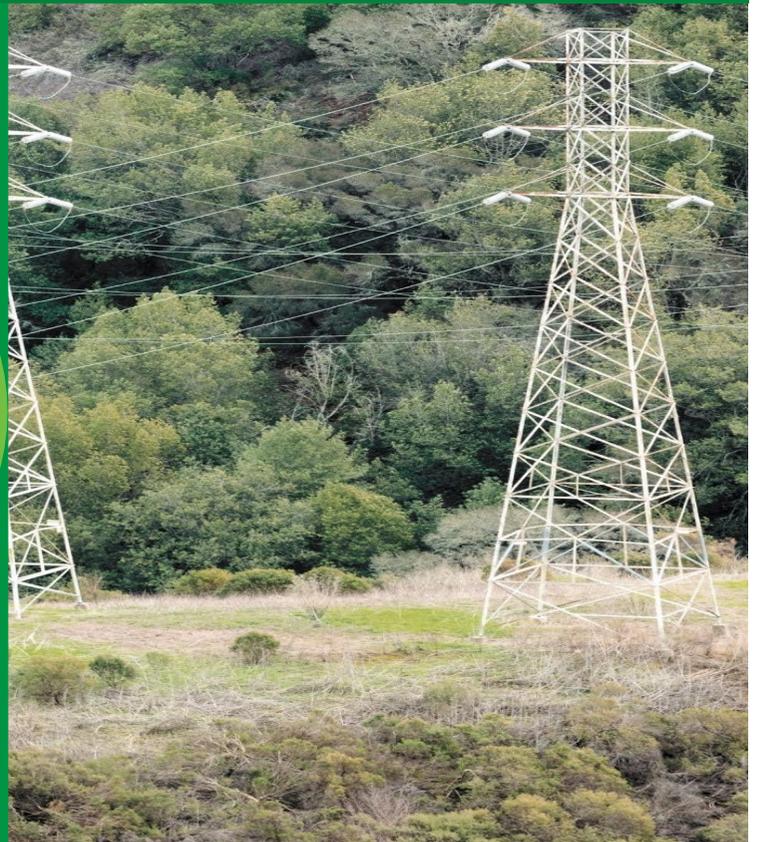


# The Office of Energy Infrastructure Safety's 2023 Safety Culture Assessment

## LS Power Grid California

Prepared by the National Safety Council

Published March 2024





## Table of Contents

<b>Executive Summary</b>	<b>3</b>
<b>1 Safety Culture Assessment</b>	<b>4</b>
1.1 Safety Culture Assessment Framework	4
1.2 Overview	4
<b>2 LS Power Inputs and Findings</b>	<b>10</b>
2.1 LS Power Inputs to the SCA	10
2.2 Strengths	10
2.3 Opportunities	13
<b>3 Recommendations</b>	<b>15</b>
3.1 Improve Safety Culture Objectives	15
3.1.1 Develop Additional Safety Culture Objectives	15
<b>4 Conclusion</b>	<b>17</b>
<b>5 Safety Culture Objectives</b>	<b>18</b>

## Executive Summary

---

The Office of Energy Infrastructure Safety's (Energy Safety's) third annual Safety Culture Assessment 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.

This report contains the assessment of LS Power Grid California's (LS Power's) inputs to the 2023 Safety Culture Assessment and associated findings and recommendations. The findings and recommendations are based on LS Power's safety culture objectives. LS Power is a new electrical corporation in California and has not yet begun operations in California. Therefore, it has not previously participated in the Safety Culture Assessment process, and as such did not submit lessons learned or progress on its 2022 recommendations.

According to its Safety Culture Assessment inputs in 2023, LS Power is actively implementing its safety vision and guiding principles.

To drive consistent improvement in its safety culture throughout the organization, LS Power should act on the recommendations below.

- LS Power should develop additional 12-month and 3-year safety culture objectives.
- LS Power should review its safety culture objectives and ensure that 12-month objectives build toward 3-year objectives.

# 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).<sup>1</sup> The SCA Guidelines are built on Resolution SPD-6, adopted by the California Public Utilities Commission (CPUC) on December 1, 2022.<sup>2</sup> The framework for Energy Safety's SCA, included in Resolution SPD-6,<sup>3</sup> 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),<sup>4</sup> Energy Safety must conduct an annual SCA for each California electrical corporation.<sup>5</sup> Energy Safety contracted the

---

<sup>1</sup> [Safety Culture Assessment Guidelines for Electrical Corporations \(April 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true>, accessed Sept. 28, 2023).

<sup>2</sup> [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)

(<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M499/K482/499482543.pdf>, accessed Sept. 28, 2023).

<sup>3</sup> [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) page 11

(<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M499/K482/499482543.pdf>, accessed Sept. 28, 2023).

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

([https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=8389.&lawCode=PUC](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8389.&lawCode=PUC), accessed Sept. 28, 2023).

<sup>5</sup> In 2023, the California electrical corporations required to participate in Energy Safety's Safety Culture Assessment were Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), Liberty Utilities, PacifiCorp, Bear Valley Electric Service, Inc., Horizon West Transmission, Trans Bay Cable, and LS Power Grid California (LS Power).

National Safety Council (NSC)<sup>6</sup> 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.<sup>7</sup> 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<sup>8</sup> (Large IOUs):** Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE).

---

<sup>6</sup> The National Safety Council is a nonprofit, mission-based organization focused on eliminating the leading causes of preventable death and injury.

<sup>7</sup> [Safety Culture Assessment Guidelines for Electrical Corporations \(April 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true) (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](https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-%20safety/safety-culture-assessments/) for more information (https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-%20safety/safety-culture-assessments/, accessed Sept. 28, 2023).

<sup>8</sup> In this document "utility" means "electrical corporation."

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

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 kinds of electrical corporations to complete different components of the SCA as follows:<sup>9</sup>

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	Large IOUs	Energy Safety uses the management self-assessment, a detailed assessment of organizational systems, to

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

Component	Electrical corporations that must complete this component	Commentary
summary plan for the coming year		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 only completed by the large electrical corporations and SMJUs in the 2023 SCA process: it was not completed by the ITOs.

### 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 2023 SCA process: it was not completed by the SMJUs or ITOs.

### 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 recommendations.<sup>10</sup> 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.

As of the 2023 SCA LS Power had not yet begun operating in California and so did not have lessons learned to report. This is the first year that LS Power participated in the SCA process, so it cannot report its progress on the previous year's recommendations.

### 1.2.2.4 Interviews

Follow-up interviews were only conducted with the large electrical corporations in the 2023 SCA process; they were not conducted with the SMJUs or ITOs.

---

<sup>10</sup> See Section 2 "Application of Safety Culture Assessment Components to Different Electrical Corporations," [Safety Culture Assessment Guidelines for Electrical Corporations \(April 2023\)](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true) (<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true>, accessed Feb. 28, 2024).

### 1.2.2.5 Observational Visits

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

### 1.2.2.6 Supporting Documentation

The SCA Guidelines provide that Energy Safety may ask for supporting documentation.<sup>11</sup> 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.

---

<sup>11</sup> 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.energy-safety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true>, accessed Feb. 28, 2024).

## 2 LS Power Inputs and Findings

---

### 2.1 LS Power Inputs to the SCA

The findings and recommendations below are based on LS Power’s safety culture objectives.<sup>12</sup> In the 2023 SCA process, ITOs were required to submit safety culture objectives, lessons learned, and progress on 2022 recommendations; although it is an ITO, LS Power was limited to the submission of safety culture objectives.<sup>13</sup> As noted above, as of the 2023 SCA, LS Power had not yet begun operating in California and so did not have lessons learned to report. Also, this is the first year that LS Power participated in the SCA process, so it cannot report its progress on the previous year’s recommendations.

In 2023, the first step of the SCA process was submission of the safety culture objectives, lessons learned, and progress on 2022 recommendations. LS Power submitted its safety culture objectives on July 7, 2023. LS Power did not append any supporting documentation to its submission.

### 2.2 Strengths

Through its safety culture objectives, LS Power has demonstrated safety culture strengths, identified in the following sections. LS Power should continue to build on these to advance its safety culture.

#### 2.2.1 Vision and Guiding Principles

LS Power’s 12-month and 3-year safety culture objectives pertain to contractor safety,

---

<sup>12</sup> See Section 5 for LS Power’s safety culture objectives.

<sup>13</sup> See Section 2 “Application of Safety Culture Assessment Components to Different Electrical Corporations,” [Safety Culture Assessment Guidelines for Electrical Corporations \(April 2023\)](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true) (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true, accessed Feb. 28, 2024).

employee safety and health, safety audits, safety performance rewards, employee engagement, incident investigation, and root cause analysis.<sup>14</sup> They indicate a dedication to advancing safety performance. LS Power’s objectives illustrate an established vision for safety, identified progress metrics, supported by a holistic approach to safety.

Organizations with advanced safety culture maturity evaluate safety performance by tracking not just lagging indicators<sup>15</sup> such as injuries, but also leading indicators.<sup>16</sup> In addition to tracking recordable injuries, LS Power tracks two leading indicators. The first is identification and mitigation of safety risks. By completing safety audits, job hazard analyses, and root cause analyses, LS Power can strengthen its ability to address exposure before an incident occurs. The second leading indicator LS Power tracks is training completion. By providing annual employee safety training, LS Power can educate employees on workplace hazards and how to mitigate them.

## 2.2.2 Contractors Incorporated into Safety Culture Objectives

Another strength of LS Power’s approach to safety culture is its incorporation of contractor training in the organization’s safety culture objectives.<sup>17</sup> In less mature organizations, contractors may be regarded as a peripheral factor in safety performance.

## 2.2.3 Focus on Workforce Involvement to Improve Safety Culture

LS Power recognizes the need for employee involvement and accountability to build a culture of trust and improve safety. LS Power’s 12-month safety culture objective “Reward Safety Performance” indicates an intention to recognize and reward employees and

---

<sup>14</sup> See Section 5 for LS Power’s safety culture objectives.

<sup>15</sup> Lagging indicator: an outcome or output measure that is backward-looking, describing a past event. [Safety Culture Assessment Guidelines for Electrical Corporations \(April 2023\)](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true) (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true, accessed Feb. 28, 2024).

<sup>16</sup> Leading indicator: an input measure that is predictive of a future event. [Safety Culture Assessment Guidelines for Electrical Corporations \(April 2023\)](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true) (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true, accessed Feb. 28, 2024).

<sup>17</sup> See Section 5 for LS Power’s safety culture objectives.



contractors who are actively participating in safety activities.<sup>18</sup> Positive reinforcement that rewards best practices may lead to sustainable changes in behavior.

In LS Power's 3-year safety culture objective "Employee Engagement," the intention to hold monthly "safety minute" topics at the start of each meeting, provide job hazard analysis forms in both electronic and paper formats, and to have a dedicated process for documenting near-miss submissions is included.<sup>19</sup> Involving employees in problem solving, safety observations, inspections, and training helps to cultivate a company culture that values employee input and effort. It also encourages both employees and leadership to share in ownership of LS Power's safety strategy.

---

<sup>18</sup> See Section 5 for LS Power's safety culture objectives.

<sup>19</sup> See Section 5 for LS Power's safety culture objectives.

## 2.3 Opportunities

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

### 2.3.1 Safety Culture Objectives

LS Power has four 12-month safety culture objectives and two 3-year safety culture objectives.<sup>20</sup> LS Power would benefit from developing these objectives further as described below.

#### 2.3.1.1 Adding Objectives

Developing additional safety culture objectives, including benchmarks relevant to the organization's goals regarding adherence to its guiding principles and continuous improvement, openness, and trust, would support development of a safer workplace culture. It would also enable LS Power to further clarify its strengths and weaknesses.

See the corresponding recommendation in Section 3.1.1 of this report.

#### 2.3.1.2 Short-Term Objectives Building toward Long-Term Objectives

LS Power's 2023 safety culture objectives, while sufficiently defined and specific in their targets, do not illustrate how LS Power intends to continuously improve its safety culture over the coming years. The 12-month objectives are as follows:

Objective 1. Contractor Safety

Objective 2. Employee Safety and Health

Objective 3. Safety Audits

---

<sup>20</sup> See Section 5 for LS Power's safety culture objectives.



#### Objective 4. Reward Safety Performance

The 3-year objectives seem to be roughly on the same level of ambition and vision as the 12-month objectives:

##### Objective 1. Employee Engagement

##### Objective 2. Accident Investigation and Root Cause Analysis

It is unclear how the 12-month objectives represent milestones on the way to longer-term achievements represented by the 3-year objectives.

See the corresponding recommendation in Section 3.1.2 of this report.

## 3 Recommendations

---

Culture change takes time, dedication, and starts with understanding where a company is on its organizational safety culture journey and the underlying drivers influencing the workforce. The recommendations in this report are based on observations from LS Power's 2023 SCA input: safety culture objectives.

Recommendations for LS Power 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 Improve Safety Culture Objectives

#### 3.1.1 Develop Additional Safety Culture Objectives

LS Power should develop additional objectives to build a strong and effective safety culture. LS Power should consider topics like defining responsibilities, creating an organizational vision for safety, developing a system for open communication, involving all levels of employees in safety activities, operationalizing reporting systems, training, and demonstrating commitment to continual growth.

##### 3.1.1.1 Observation

LS Power's 2023 12-month safety culture objectives included four objectives concerning contractor safety, employee safety and health, safety audits, and rewarding safety performance. Its 3-year safety culture objectives included two objectives related to employee engagement, incident investigation, and root cause analysis. LS Power's description of these objectives and progress metrics could be enhanced by providing additional details.

##### 3.1.1.2 Goals of Recommendation

The goal of this recommendation is for LS Power to develop additional and more detailed

---

safety culture objectives in 2024.

### **3.1.1.3 Verification Method**

In its 2024 progress report on its 2023 recommendations, LS Power must provide an update on its 2023 objectives and include additional and more detailed safety culture objectives.

## **3.1.2 Review and Refine Safety Culture Objectives**

LS Power should review its safety culture objectives and ensure that its 12-month objectives build toward its 3-year objectives.<sup>21</sup>

### **3.1.2.1 Observation**

LS Power provided minimal objectives for its 12-month and 3-year plan. It is unclear how LS Power's 12-month objectives build toward its 3-year objectives.

### **3.1.2.2 Goal of Recommendation**

The goal of this recommendation is to improve LS Power's safety culture objectives such that they illustrate LS Power's long-term vision for safety culture and the milestones it expects to achieve on the way.

### **3.1.2.3 Verification Method**

In its 2024 SCA safety culture objectives, LS Power must include additional objectives and provide 3-year safety culture objectives that are supported by 12-month objectives.

---

<sup>21</sup> See Section 5 for LS Power's safety culture objectives.



## 4 Conclusion

---

This report provides the findings and recommendations from LS Power’s 2023 SCA, its first under Public Utilities Code section 8389(d)(4). Following the publication of this report, LS Power 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 LS Power. 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 LS Power’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 Safety Culture Objectives

---



OFFICE OF ENERGY  
INFRASTRUCTURE  
SAFETY



Innovation and Investment in Energy

# Safety Culture Objectives Report

July 2023

# LS Power Development, LLC





## Section 1. Safety Culture Objectives

The electrical corporation provided a description of its 12 month and 3-year safety culture objectives. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

### 1.1 Objectives for the Next 12 Months

#### A1. Objective 1

Contractor Safety

#### B1. Progress Metrics (if applicable)

Contractor receive site specific safety orientation.

Weekly reporting to include Man-Hours, OSHA Recordable Incidents, and Near Misses

#### C1. 12-Month Target

100%

0

#### D1. Description of Objective

Ensures contractors are familiar with the specific site, and equipment related to life safety and wildfire mitigation.

Increases visibility into OSHA recordables and Near Miss incidents in real time to see trends developing. This data will drive the content of the site specific training topics.

#### A2. Objective 2

Employee Safety and Health

#### B2. Progress Metrics (if applicable)

OSHA Recordable Incidents.

Annual Employee Safety Training.

#### C2. 12-Month Target

0

100% Completion by due date

#### D2. Description of Objective

Lagging incident indications will drive toward areas of immediate needed mitigation.

Yearly training will allow employees to understand expected risks, and what is being done to mitigate those risks.

### A3. Objective 3

---

Safety Audits

#### C3. 12-Month Target

---

4 (Quarterly)

### A4. Objective 4

---

Reward Safety Performance

#### C4. 12-Month Target

---

As Recognized

### B3. Progress Metrics (if applicable)

---

Safety Audit Report Form to be completed by Corporate Safety During On-Site Audit Visit.

#### D3. Description of Objective

---

This will allow for fresh sets of eyes to audit the site quarterly to identify hazards in the leading phase before incidents occur.

### B4. Progress Metrics (if applicable)

---

Recognize and Reward employees and contractors who exhibit actively participating in safety.

#### D4. Description of Objective

---

Employees and Contractors can be nominated as any point by a peer for actively participating and modeling safe behavior. The employees are recognized in the field as well as in monthly leadership meetings. The goal of this program is to encourage safety leadership for every employee regardless of role.



## LS Power

### 2023 Safety Culture Assessment

## Section 1. Safety Culture Objectives

The electrical corporation provided a description of its 12 month and 3-year safety culture objectives. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

### 1.2 Objectives for the Next 3 Years

#### A1. Objective 1

Employee Engagement

#### B1. Progress Metrics (if applicable)

Monthly "safety minute" topics to be included at the start of each meeting.

JHA forms are made available in both electronic and paper form

Dedicated email/process for "Near Miss" submissions, with follow-up provided to submitter

#### C1. 3-Year Target

100% JHA Completion

100% Yearly Training Completion

Increasing Yearly Trend for Near-Miss Submissions.

#### D1. Description of Objective

100% Completion of Training and JHA's show employee "Buy in" and Participation in Safety. This allows employees to stay engaged in safety. LS Power believes risks exists all around. Better identification of those risks during the leading phase and increasing awareness will lead to reducing incidents.

## A2. Objective 2

---

Incident Investigation and Root Cause Analysis

### C2. 3-Year Target

---

100% of Incidents are investigated.  
100% OSHA Recordable and SIF Events receive  
RCA Investigation

## B2. Progress Metrics (if applicable)

---

Contractor Incidents are de-briefed monthly at project meetings.

Contractor Incidents that meet SIF requirements receive an RCA automatically.

### D2. Description of Objective

---

Every incident has lessons to be learned and LS Power's goal is to find those lessons for each incident that occurs.

SIF incidents and OSHA recordable need a deeper investigation. Taproot RCA process will be applied to each of these incidents.



OFFICE OF ENERGY  
INFRASTRUCTURE  
SAFETY



**LS Power**  
*2023 Safety Culture Assessment*

## Section 2. Supporting Documents

*The electrical corporation had the option to submit supporting documentation for the safety culture objectives and lessons learned.*

No supporting documentation was submitted.

The logo for nsc features a stylized green grid icon to the left of the lowercase letters 'nsc' in a bold, sans-serif font. The background of the entire page is a photograph of several high-voltage power line towers silhouetted against a sunset sky with orange and blue tones. A thick green curved bar is positioned at the bottom of the image, partially overlapping the towers.

**nsc**