



December 19, 2025

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: 2024 Safety Culture Assessment for LS Power Grid California**

Mr. Holt:

Enclosed is the 2024 Safety Culture Assessment (SCA) for LS Power Grid California (LS Power) presenting the findings and recommendations of the assessment conducted by the Office of Energy Infrastructure Safety (Energy Safety) pursuant to Public Utilities Code section 8386.2(b).

LS Power can satisfy the requirement in Public Utilities Code section 8389(a)(2) by agreeing to implement the recommendations of its most recent SCAs performed pursuant to Public Utilities Code section 8386.2. This may be done by LS Power for the Energy Safety SCA by submitting a letter to that effect to the 2024 Safety Culture Assessments docket (Docket #2024-SCAs).<sup>1</sup>

Sincerely,

/s/

Suzie Rose  
Program Manager, Electrical Undergrounding and Culture Division  
Office of Energy Infrastructure Safety

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<sup>1</sup> [2024 Safety Culture Assessments \(SCAs\) docket](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024-SCAs)

(<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024-SCAs>, accessed December 15, 2025).





**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**

**2024 SAFETY CULTURE ASSESSMENT**

**REPORT FOR LS POWER GRID**

**CALIFORNIA**

December 2025



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# Executive Summary

The Office of Energy Infrastructure Safety's (Energy Safety's) 2024 Safety Culture Assessment (SCA) of electrical corporations in California took place from December 2024 to August 2025. The Energy Safety SCA is focused on the safety culture within an electrical corporation's wildfire mitigation work setting. Energy Safety directed the process pursuant to Public Utilities Code section 8389(d)(4) and in accordance with Energy Safety's Safety Culture Assessment Guidelines for Electrical Corporations (SCA Guidelines).<sup>1</sup> Energy Safety utilized a contractor, National Safety Council (NSC) to administer the Energy Safety 2024 SCAs and to provide initial analysis of the assessment data collected prior to Energy Safety's production and publication of the safety culture assessment reports.

This report contains an assessment of LS Power Grid California's (LS Power's) inputs into its 2024 Safety Culture Assessment and associated findings, and recommendations. The safety culture assessment findings and recommendations are based on LS Power's safety culture objectives, lessons learned, progress on the previous year's recommendations, and supporting documentation.<sup>2</sup>

According to its SCA inputs in 2023 and 2024, LS Power is implementing its safety vision and guiding principles.<sup>3,4</sup>

The safety culture recommendations for LS Power are summarized below. LS Power should act on these recommendations immediately to drive consistent improvement in its safety culture.

## **Recommendations**

### **Recommendation 1: Improve Safety Culture Objectives**

LS Power should develop additional safety culture objectives to build a strong and effective safety culture. LS Power should continue to review its safety cultures objectives to ensure its 12-month objectives build towards its 3-year objectives. This recommendation continues a recommendation from Energy Safety's 2023 SCA Report for LS Power.<sup>5</sup>

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<sup>1</sup> Safety Culture Assessment Guidelines for Electrical Corporations:

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57736&shareable=true>, (accessed Dec. 18, 2024).

<sup>2</sup> See Appendix A for LS Power's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

<sup>3</sup> Energy Safety's 2023 SCA Report for LS Power:

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56375&shareable=true>, (accessed Dec. 18, 2024).

<sup>4</sup> See Appendix A for LS Power's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

<sup>5</sup> Energy Safety's 2023 SCA Report for LS Power :

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56375&shareable=true>, (accessed Dec. 18, 2024).

**Recommendation 2: Review and Refine Safety Culture Objectives**

LS Power should continue to review its safety culture objectives and ensure that its 12-month objectives build toward its 3-year objectives. This recommendation is repeated From Energy Safety's 2023 Report for LS Power.<sup>6</sup>

**Recommendation 3: Provide Safety Committee Information Necessary to Develop Successful Safety Strategies**

LS Power should identify how its safety committee plans to collect information from employees and contractors to develop its safety strategies.

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<sup>6</sup> Energy Safety's 2023 SCA Report for LS Power :

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56375&shareable=true>, (accessed Dec. 18, 2024).

# 1. Introduction

In 2019, Section 8389 was added to the Public Utilities Code to require the California Public Utilities Commission (CPUC), in consultation with the Office of Energy Infrastructure Safety (Energy Safety), to develop a process for Energy Safety to conduct annual Safety Culture Assessments (SCAs) for each electrical corporation.<sup>7</sup> Pursuant to Public Utilities Code section 8389(d)(4),<sup>8</sup> Energy Safety must conduct an annual SCA for each California electrical corporation.<sup>9</sup> The first safety culture assessment process was adopted by the CPUC on November 19, 2020, in Resolution WSD-011.<sup>10</sup> The first SCAs took place in 2021.

## 1.1 Focus of Energy Safety's SCA

Energy Safety's assessment focuses on the safety culture present in an electrical corporation's wildfire mitigation work setting: the setting most pertinent to personal and public wildfire risks. The objective of the process is to evaluate an electrical corporation's safety culture to identify best practices and relative gaps. This process includes an understanding of each corporation's relative strengths and opportunities in designing and implementing a strong safety culture. Energy Safety assesses safety culture outcomes over time and incorporates continuous learning into the safety culture assessment findings.

Energy Safety's SCA process is distinct from and complementary to other safety culture assessments required elsewhere in the Public Utilities Code. Energy Safety's assessment is not a replacement for ongoing work to improve the safety culture at each electrical corporation.

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<sup>7</sup> 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), (accessed May 19, 2025).

<sup>8</sup> 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), (accessed Dec. 18, 2024).

<sup>9</sup> Public Utilities Code 218:

[https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=PUC&sectionNum=218](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC&sectionNum=218), (accessed May 19, 2025).

<sup>10</sup> Resolution WSD:

<https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fdocs.cpuc.ca.gov%2FPublishedDocs%2FPublished%2FG000%2FM352%2FK490%2F352490594.docx&wdOrigin=BROWSELINK>, (accessed Dec. 18, 2024).

## 2. Methodology

The Energy Safety SCA process gathers insights from workforce surveys, management self-assessments, interviews and the analysis of an electrical corporation's progress towards its strategic safety culture objectives. These insights inform the understanding of cultural behaviors, values, communication, the workplace environment and workplace norms.

### 2.1 Safety Culture Assessment Framework

The framework for Energy Safety's SCA process is outlined in the 2024 SCA Process adopted by the CPUC on November 16, 2023.<sup>11</sup> The process for Energy Safety's SCAs is rooted in the understanding that safety culture affects both personal and wildfire safety outcomes and by extension its study provides insights into strengths and key opportunities for improvement. Energy Safety published the most recent SCA Guidelines on December 17, 2024.<sup>12</sup> The SCA Guidelines were informed by the 2024 SCA Process and outline the SCA requirements and components for each category of electrical corporation. The SCA Guidelines categorize electrical corporations as follows:

- **Large electrical corporations:** Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E).
- **Small and multijurisdictional utilities (SMJUs)**<sup>13</sup>: Bear Valley Electric Service, Inc (BVES), Liberty Utilities, and PacifiCorp.
- **Independent transmission operators (ITOs):** Horizon West Transmission (HWT), LS Power Grid California (LS Power), and Trans Bay Cable (TBC).

### 2.2 Energy Safety SCA Process Elements

The SCA process includes six elements: a workforce survey; a management self-assessment; safety culture objectives, lessons learned, and progress on the previous year's recommendations; interviews; observational visits; and supporting documentation. Not every component applies to every electrical corporation.

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<sup>11</sup> RESOLUTION SPD-14: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/safety-policy-division/documents/final-resolution-spd14-retaining-existing-performance-metrics-wmp-requirements-and-safety-culture-as.pdf>, (accessed Dec. 18, 2024).

<sup>12</sup> Safety Culture Assessment Guidelines for Electrical Corporations: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57736&shareable=true>, (accessed Dec. 18, 2024).

<sup>13</sup> In this document "utility" means "electrical corporation".

### 2.2.1 Workforce Survey

The workforce survey is a survey comprised of 30 statements that respondents anonymously evaluate on a five-point scale ranging from “strongly disagree” to “strongly agree.”<sup>14</sup> Survey statement categories include wildfire safety, personal safety and overall culture. The workforce survey assesses key workforce perceptions and behaviors. The target workforce survey populations are employees and contractors who spend greater than ten percent of their time on wildfire mitigation activities. The workforce survey is administered to each large electrical corporation and SMJU, but not to any ITO.

### 2.2.2 Management Self-Assessment

The management self-assessment consists of 22 questions across three categories: organizational sustaining systems, governance, and safety-enabling systems. Electrical corporations use a maturity model scale to self-rate and provide reasoning to support each self-rating. The management self-assessment questions are rated using a four-level behaviorally anchored rating scale that is customized for each question. The four levels (1. Public Compliance, 2. Private Compliance, 3. Stewardship, and 4. Citizenship) indicate how safety is viewed within the organization. Public Compliance represents the lowest self-rating and a more negative view of safety culture, while Citizenship represents the highest self-rating and a more positive view of safety culture. Electrical corporations must also provide the expected self-rating for each question for the next year, along with a summary plan for the coming 12-month period to achieve targets for the next year’s expected self-rating. The management self-assessment is completed by each large electrical corporation, but not by any SMJU or ITO.

### 2.2.3 Safety Culture Objectives, Lessons Learned, and Progress on the Previous Year’s SCA Recommendations

Safety culture objectives consist of 12-month and 3-year objectives that should enhance an electrical corporation’s wildfire safety culture. The safety culture objectives must include supporting metrics, and a description of how the objectives will reduce wildfire risk.

The lessons learned section consists of descriptions of how an electrical corporation’s safety culture has evolved over the past year, the major safety lessons learned, and the actions taken in response to the lessons learned.

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<sup>14</sup> 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 Oct. 27, 2025).



Electrical corporations also must report on the progress made in implementing the recommendations from the previous year's SCA report, including the actions taken and results.

Each electrical corporation is required to annually submit safety culture objectives, lessons learned, and progress on the previous year's SCA recommendations.<sup>15</sup>

#### **2.2.4 Interviews**

Follow-up interviews are conducted with each large electrical corporation to better understand the organizational context behind its submitted management self-assessment responses.

Focus groups are held with employees and contractors from each large electrical corporation to further inform workforce survey responses. Follow-up interviews and focus groups are not conducted with the SMJUs and ITOs.

#### **2.2.5 Observational Visits**

Energy Safety may, at its discretion, conduct observational visits of an electrical corporation for direct observation of work practices and behaviors to assess the effectiveness of its safety culture.

#### **2.2.6 Supporting Documentation**

Energy Safety may, at its discretion, require supporting documentation to be submitted by an electrical corporation to support the elements of its SCA.<sup>16</sup> An electrical corporation may voluntarily submit supporting documentation to provide additional context to its responses.

## **3. Assessment Inputs**

As an ITO, LS Power was required to submit its safety culture objectives, lessons learned and progress on the previous year's recommendations for its 2024 SCA.

### **3.1 Workforce Survey**

As an ITO, LS Power was not required to complete a workforce survey for its 2024 SCA.

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<sup>15</sup> Safety Culture Assessment Guidelines for Electrical Corporations:

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57736&shareable=true>, (accessed Dec. 28, 2024).

<sup>16</sup> Safety Culture Assessment Guidelines for Electrical Corporations:

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57736&shareable=true>, (accessed Dec. 18, 2024).

## 3.2 Management Self-Assessment

As an ITO, LS Power was not required to complete a management self-assessment for its 2024 SCA.

## 3.3 Safety Culture Objectives, Lessons Learned, and Progress on the Previous Year's SCA Recommendations

On January 24, 2025, LS Power submitted its safety culture objectives, lessons learned, and progress on the previous year's (2023) recommendations.

### 3.3.1 12-Month Objectives

LS Power provided six 12-month objectives, with progress metrics and targets in the following areas: contractor safety (1 objective), employee safety and health (1 objective), safety audits (1 objective), safety performance awards (1 objective), safety committee strategy development (1 objective) and an emergency task force for emergency operations training (1 objective).<sup>17</sup>

### 3.3.2 3-Year Objectives

LS Power provided four 3-year objectives, with progress metrics and general targets in the following areas: employee engagement (1 objective), incident investigation and root cause analysis (1 objective), safety leadership development (1 objective), continuous safety innovation (1 objective).<sup>18</sup>

### 3.3.3 Lessons Learned

LS Power provided one major theme for its lessons learned, focused on improving contractor safety metrics and how contractors can learn from safety incident and near-miss<sup>19</sup> reporting.<sup>20</sup>

LS Power found that contractors continue to use the total recordable incident rate (TRIR) and zero near-missed or incidents as metrics for success. LS Power stated it has worked with its

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<sup>17</sup> See Appendix A for LS Power's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

<sup>18</sup> See Appendix A for LS Power's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

<sup>19</sup> 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: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57736&shareable=true>, (accessed Dec. 18, 2024).

<sup>20</sup> See Appendix A for LS Power's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

contractors to move towards the use of a safety classification and learning model (SCL) to evaluate incidents for capacity to fail and the worker understanding of the potential for harm.

### 3.3.4 Progress on the Previous Year's Recommendations

In 2023, LS Power received two recommendations in its 2023 SCA report: 1. Develop Additional Safety Culture Objectives, and 2. Review and Refine Safety Culture Objectives.<sup>21</sup>

For progress on Recommendation 1. Develop Additional Safety Culture Objectives, LS Power added two additional objectives to both its 12-month and 3-year objectives.

For progress on Recommendation 2. Review and Refine Safety Culture Objectives, LS Power reported that it introduced safety leadership development as a 3-year objective and implemented a training focus to empower front-line construction teams.

### 3.3.5 Interviews

As an ITO, LS Power was not required to complete interviews or focus groups for its 2024 SCA.

## 3.4 Observational Visits

Energy Safety did not complete observational visits for its 2024 SCA process.

## 3.5 Supporting Documentation

LS Power did not submit any supporting documentation.

# 4. Assessment Findings

The findings and recommendations below are based on LS Power's safety culture objectives, lessons learned, and progress on the previous year's (2023) recommendations.<sup>22</sup>

## 4.1 Strengths

Through its SCA inputs, LS Power has demonstrated safety culture strengths in its vision and guiding principles, integration of contractors into safety culture objectives, and a focus to involve its workforce in safety culture improvements. LS Power should continue to build on these strengths to advance its safety culture.

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<sup>21</sup> See Appendix A for LS Power's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

<sup>22</sup> See Appendix A for LS Power's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

### 4.1.1 Vision and Guiding Principles

LS Power's 12-month safety culture objectives pertain to contractor safety, employee safety and health, safety audits and safety performance rewards. LS Power's 3-year safety culture objectives focus on employee engagement, incident investigation, and root cause analysis.<sup>23</sup> These objectives indicate dedication to advancing safety performance. Further, they illustrate an established vision for safety, supported by identified progress metrics and a holistic approach to safety culture improvement.

Organizations with advanced safety culture maturity evaluate safety performance by tracking not just lagging indicators such as injuries but also leading indicators.<sup>24</sup> In addition to tracking recordable injuries, LS Power tracks two leading indicators. The first is the 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.

### 4.1.2 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 12-month safety culture objectives.<sup>25</sup> LS Power states contractors will receive site specific safety orientation and safety performance recognition. LS Power's goal to include contractors in safety communication and incentives demonstrate an ongoing effort to encourage safety performance and culture. In less mature organizations, contractors may be regarded as a peripheral factor in safety performance.

### 4.1.3 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" states an intention to recognize and reward employees and contractors who are actively participating in safety activities.<sup>26</sup> Positive reinforcement that rewards best practices may lead to sustainable changes in behavior.

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<sup>23</sup> See Appendix A for LS Power's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

<sup>24</sup> Safety Culture Assessment Guidelines for Electrical Corporations:

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57736&shareable=true>, (accessed Dec. 18, 2024).

<sup>25</sup> See Appendix A for LS Power's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

<sup>26</sup> See Appendices for LS Power's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.



In LS Power’s 3-year safety culture objective “Employee Engagement,” LS Power states that it aims to achieve 100% Job Hazard Analysis (JHA) and training completion. Additionally, this objective includes a dedicated process for documenting near-miss submissions.<sup>27</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 ownership of LS Power’s safety strategy.

## 4.2 Opportunities

Based on LS Power’s SCA inputs, LS Power has two areas of opportunity where it can strengthen its safety culture. The following section describes the areas where LS Power should prioritize improving its safety culture.

### 4.2.1 Safety Culture Objectives

While LS Power’s 2024 safety culture objectives include positive safety measures, such as data collection of recordable incidents, near-misses, and safety audits, it is unclear how the 12-month objectives represent milestones on the way to longer-term achievements represented by the 3-year objectives. Safety culture objectives that have clear long-term action items for improvement are imperative to changing the landscape of an organization. LS Powers’s safety culture objectives lacked this aspect of long-term planning.

Refer to Section 5.1 of this report for the recommendations that pertain to this opportunity.

### 4.2.2 Safety Committee

In one of its 12-month objectives labeled “Safety Committee”, LS Power detailed the use of a safety committee to allow collaboration across multiple areas of the company to have input on safety strategies within the company. While the use of a safety committee is a good start, the objective does not identify who will be on the committee or how it will collaborate with LS Power employees and contractors to develop the safety strategies. LS Power should identify details such as these in its objective. Most critically, LS Power should determine the means by which it plans to collect information, which could be through active efforts or by creating or enhancing reporting systems to empower employees and contractors to raise safety-related information as they engage in their work.

Refer to Section 5.2 of this report for the recommendation that pertain to this opportunity.

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<sup>27</sup> See Appendix A for LS Power’s Safety Culture Objectives, Lessons Learned, and Progress on Previous Year’s Recommendations.

## 5. Recommendations

Evolving safety culture is a gradual process and starts with understanding an organization's current cultural state, and the underlying drivers influencing its workforce. 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(s). The recommendations included below build on the recommendations from Energy Safety's 2023 SCA Report for LS Power.<sup>28</sup>

### 5.1 Improve Safety Culture Objectives

#### 5.1.1 Develop Additional Safety Culture Objectives

LS Power should continue to 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 a commitment to continual growth. This recommendation is repeated from Energy Safety's 2023 SCA Report for LS Power.

#### 5.1.2 Observation

LS Power's 2024 12-month safety culture objectives included objectives concerning contractor safety, employee safety and health, safety audits, and rewarding safety performance. Its 3-year safety culture objectives included objectives related to employee engagement, incident investigation, continuous safety innovation, and root cause analysis. LS Power's description of these objectives and indicators of progress should be enhanced by providing additional details on the targets, how they will be measured, and how they will positively affect wildfire preparedness.

#### 5.1.3 Goal of Recommendation

The goal of this recommendation is for LS Power to develop more detailed safety culture objectives in its next SCA.

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<sup>28</sup> Energy Safety's 2023 SCA Report for LS Power:

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56375&shareable=true>, (accessed Dec. 18, 2024).

### 5.1.4 Verification Method

In its next progress on previous year's recommendations, LS Power must provide an update on its 2024 objectives and include additional safety culture objectives. Detailed descriptions for the 12-month objectives targets and 3-year objectives targets must also be provided.

## 5.2 Review and Refine Safety Culture Objectives

LS Power should continue to review its safety culture objectives and ensure that its 12-month objectives build toward its 3-year objectives.<sup>29</sup> This recommendation is repeated From Energy Safety's 2023 Report for LS Power.

### 5.2.1 Observation

It is unclear how LS Power's 12-month objectives build toward its 3-year objectives. The lack of connection between these short-term and long-term objectives limits the potential for safety culture growth.

### 5.2.2 Goal of Recommendation

The goal of this recommendation is to improve LS Power's 12-month and 3-year safety culture objectives to align LS Power's short and long-term visions for safety culture and the milestones it expects to achieve on the way. LS Power should align its objectives to support meaningful change.

### 5.2.3 Verification Method

In its next SCA safety culture objectives, LS Power must provide 3-year safety culture objectives that are different than and directly supported by 12-month objectives. This should result in new 12-month and 3-year safety culture objectives that are aligned and connected in their overall goals.

## 5.3 Provide Safety Committee Information Necessary to Develop Successful Safety Strategies

LS Power should identify how its safety committee plans to collect information from employees and contractors to develop its safety strategies. LS Power should assess its current two-way communication practices to determine what information this committee

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<sup>29</sup> See Appendix A for LS Power's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

can use and identify reporting gaps that would hinder the committee from having the information necessary to be successful. If LS Power finds relevant information and reporting gaps, it should consider developing 12-month and 3-year objectives that include solutions related to this topic. A strong safety culture requires that employees have a means of communicating safety-related information as well as access to feedback on these items.

### **5.3.1 Observation**

Based on LS Power's SCA, it is unclear if there is an opportunity for employees to communicate safety information with leadership. LS Power's 2024 12-month and 3-year safety culture objectives lack objectives specifically addressing two-way safety communication that is accessible to all employees and corporate leadership.

### **5.3.2 Goals of Recommendation**

The goal of this recommendation is for LS Power to integrate two-way safety communication in safety culture objectives in next SCA.

### **5.3.3 Verification Method**

In LS Power's next progress on previous year's recommendations, LS Power must provide an update on enhancing two-way safety communication within the company. Specifically, LS power must assess current communication pathways and identify opportunities for improvement. LS Power must share the results of their internal communication pathway assessment, and if no direct communication pathway exists, it must develop one. Additionally, in its next SCA safety culture objectives, LS Power must include two-way safety communication into both its 12-month and 3-year objectives and ensure that the two objectives are aligned.



## 6. Conclusion

This report provides the findings and recommendations from Energy Safety's 2024 SCA for LS Power, its second 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 the safety culture at LS Power. Energy Safety evaluates an electrical corporation's safety culture to identify best practices and relative gaps. This process includes understanding 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.

# DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



OFFICE OF ENERGY INFRASTRUCTURE SAFETY  
A California Natural Resources Agency  
[www.energysafety.ca.gov](http://www.energysafety.ca.gov)  
715 P Street, 15th Floor  
Sacramento, CA 95814  
916.902.6000

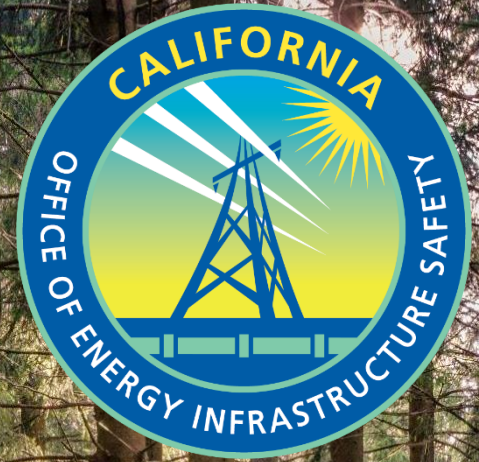






# APPENDICES





## **APPENDIX A: Safety Culture Objectives, Lessons Learned, and Progress on the Previous Year's Recommendations**





OFFICE OF ENERGY  
INFRASTRUCTURE  
SAFETY



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# **Safety Culture Objectives, Lessons Learned, and Progress on the Previous Year's Recommendations**

**January 2025**

## **LS Power Development, LLC**



OFFICE OF ENERGY  
INFRASTRUCTURE  
SAFETY



## LS Power 2024 Safety Culture Assessment

### Section 1. Safety Culture Objectives, Lessons Learned, and 2023 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.

#### 1.1 Objectives for the Next 12 Months

##### A1. Objective

Contractor Safety

##### B1. Progress Metrics

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.

Allows us to see 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

Employee Safety and Health

## **B2. Progress Metrics**

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OSHA Recordable Incidents.  
Annual Employee Safety Training.

## **C2. 12-Month Target**

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0  
100% Completion by due date

## **D2. Description of Objective**

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Lagging incident indications will point us toward areas of immediate needed mitigation.  
Yearly training will allow our employees to understand the risks they are around, and what is being done to mitigate them.

## **A3. Objective**

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Safety Audits

## **B3. Progress Metrics**

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

## **C3. 12-Month Target**

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4 (Quarterly)

## **D3. Description of Objective**

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

## **A4. Objective**

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Reward Safety Performance

## **B4. Progress Metrics**

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

## **C4. 12-Month Target**

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As Recognized

## **D4. Description of Objective**

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

## **A5. Objective**

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Safety Committee

## **B5. Progress Metrics**

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Collaborate with a group of people to determine best implementation of safety strategies.

## **C5. 12-Month Target**

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4 meetings (Quarterly)

## **D5. Description of Objective**

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This group will allow collaboration across multiple areas of the company to have input on Safety Strategies within our company.

## **A6. Objective**

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EMTF (Emergency Task Force)

## **B6. Progress Metrics**

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Leadership Group allowing for Immediate Decisions to be made during times of Emergency Operations

## **C6. 12-Month Target**

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As Needed with 1 Tabletop drill Annually.

## **D6. Description of Objective**

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This will allow for a group of leaders to make immediate decisions during Emergency Operations. This will allow for immediate mitigations as needed without delay.



## Section 1. Safety Culture Objectives, Lessons Learned, and 2023 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.*

### 1.2 Objectives for the Next 3 Years

---

#### A1. Objective

Employee Engagement

#### B1. Progress Metrics

100% JHA Completion  
100% Yearly Training Completion  
Increasing Yearly Trend for Near-Miss Submissions.

#### C1. 3-Year Target

100% Completion of Training and JHA's show employee "Buy in" and Participation in Safety. This allows employees to stay engaged in safety.  
We believe risk exists all around us. If we can be better each year at finding those risks during the leading phase and making everyone aware then we are reducing incidents occurring.

#### A2. Objective

Incident Investigation and Root Cause Analysis

#### B2. Progress Metrics

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

#### C2. 3-Year Target

We Believe every incident has lessons to be learned and we want to find those lessons for each incident that occurs.  
SIF incidents and OSHA recordables need a deeper investigation. TapRoot RCA process will be applied to each of these incidents.

#### A3. Objective

Safety Leadership Development

#### B3. Progress Metrics

Including safety conferences and Training into non-Safety team leadership.

#### C3. 3-Year Target

Annual NATF safety or Construction safety conferences/Training for construction leadership team.

#### D3. Description of Objective

Fostering a culture where every employee feels ownership of safety.

#### **A4. Objective**

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Continuous Safety Innovation

#### **B4. Progress Metrics**

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Moving more toward an SCL model for identifying incidents

#### **C4. 3-Year Target**

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Yearly training in SCL model of classifying incidents and driving incident review from this mindset.

#### **D4. Description of Objective**

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As we start to shift our focus of incidents from simply zero to learning from any and every type of incident. Our company will be able to find more risk in the leading phase.

## Section 1. Safety Culture Objectives, Lessons Learned, and 2023 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.*

### 1.3 Lessons Learned

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#### A1. Major Theme/ Lesson Learned 1

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Contractor Incident/ Near Miss debriefing

#### B1. Actions Taken

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We have found that some of our contractors continue to use TRIR and having ZERO near missed or incidents as a metric of success in safety. We have been working with these companies to move more toward an SCL model in how incidents are looked at. Did they have capacity to fail? Did the workers understand the potential for harm? This has been very appreciated by contractors.

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## Section 1. Safety Culture Objectives, Lessons Learned, and 2023 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.*

### 1.4 2023 Recommendations

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#### A1. Recommendation 1

LS Power should develop additional 12 -Month and 3- Year objectives.

#### B1. Actions Taken

2 additional objectives were added to both 12-month and 3-Year

#### C2. Results

One of these objectives was adding incorporation of SCL model to contractor incidents/Near Misses. This has produced way better collaboration/communication around these incidents which LS-Power sees as very beneficial.

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#### A2. Recommendation 2

Ls Power should review its objectives and ensure that 12 month objectives build toward 3 year objectives.

#### B2. Actions Taken

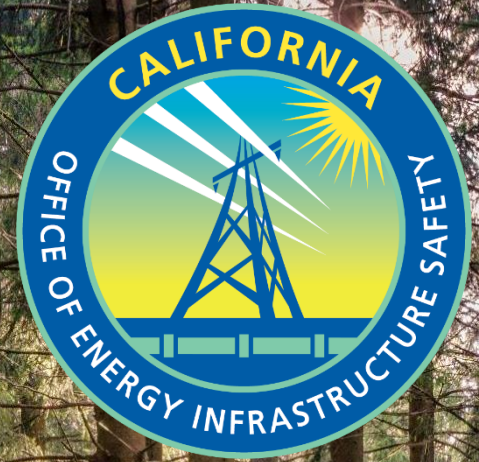
Building in Safety Leadership development as a 3 year objective

#### C2. Results

This objective has been great. As we train our front line construction team on Safety and develop their knowledge, they become the drivers of safety on sites. This has helped our 12 month objectives more toward where we want to be in 3 years.

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# APPENDIX B: Supporting Documentation





OFFICE OF ENERGY  
INFRASTRUCTURE  
SAFETY



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## Supporting Documentation

January 2025

# LS Power Development, LLC





## Section 2. Supporting Documentation

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

No supporting documentation was submitted.