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Subject: 2024 Safety Culture Assessment for Trans Bay Cable, LLC

Mr. Morgan:

Enclosed is the 2024 Safety Culture Assessment (SCA) for Trans Bay Cable, LLC (TBC) 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).

TBC 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 TBC for the Energy Safety SCA by submitting a letter to that effect to the 2024 Safety Culture Assessments docket (Docket #2024-SCAs).¹

Sincerely,

/s/

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

¹ [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 TRANS BAY CABLE

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).¹ 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 Trans Bay Cable's (TBC's) inputs into its 2024 Safety Culture Assessment and associated findings, and recommendations. The safety culture assessment findings and recommendations are based on TBC's safety culture objectives, lessons learned, progress on previous year's recommendations, and supporting documentation.²

According to its SCA inputs in 2021, 2022, 2023 and 2024, TBC has maintained a safety vision and guiding principles, along with effective integration of safety communications throughout the organization.

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

Recommendations

Recommendation 1: Encourage Safety Event Reporting

Instead of aiming for zero near-miss³ events, TBC should establish targets and undertake actions that will increase hazard and near-miss reporting. TBC leadership and frontline supervisors should encourage workers to report hazards and near-misses. This

¹ Safety Culture Assessment Guidelines for Electrical Corporations: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57736&shareable=true>, (accessed Dec. 18, 2024).

² See Appendix A for TBC's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

³ 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).

recommendation continues a recommendation from Energy Safety's 2023 SCA Report for TBC.⁴

Recommendation 2: Review and Refine Safety Culture Objectives

TBC should continue to review its safety culture objectives and ensure that its 12-month objectives build toward its 3-year objectives. This recommendation continues a recommendation from Energy Safety's 2023 SCA Report for TBC.⁵

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.⁶ Pursuant to Public Utilities Code section 8389(d)(4),⁷ Energy Safety must conduct an annual SCA for each California electrical corporation.⁸ The first safety culture assessment process was adopted by the CPUC on November 19, 2020, in Resolution WSD-011.⁹ The first SCA 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

⁴ Energy Safety's 2023 SCA Report for TBC:

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56376&shareable=true>, (accessed Dec. 18, 2024).

⁵ Energy Safety's 2023 SCA Report for TBC:

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56376&shareable=true>, (accessed Dec. 18, 2024).

⁶ Public Utilities Code section 8389:

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8389.&lawCode=PUC, (accessed May 19, 2025).

⁷ Public Utilities Code section 8389:

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8389.&lawCode=PUC, (accessed Dec. 18, 2024).

⁸ Public Utilities Code 218:

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC§ionNum=218, (accessed May 19, 2025).

⁹ Resolution WSD-011:

<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).

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.

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, 2023.¹⁰ 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, 2024.¹¹ 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)**¹²: 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).

¹⁰ 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).

¹¹ Safety Culture Assessment Guidelines for Electrical Corporations: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57736&shareable=true>, (accessed Dec. 18, 2024).

¹² In this document "utility" means "electrical corporation".

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.

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.”¹³ 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.

¹³ 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).

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.

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

Each electrical corporation is required to annually submit safety culture objectives, lessons learned, and progress on the previous year's SCA recommendations.¹⁴

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.

¹⁴ Safety Culture Assessment Guidelines for Electrical Corporations:
<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57736&shareable=true>, (accessed Dec. 28, 2024).

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.¹⁵ An electrical corporation may voluntarily submit supporting documentation to provide additional context to its responses.

3. Assessment Inputs

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

3.2 Management Self-Assessment

As an ITO, TBC 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 Recommendations

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

3.3.1 12-Month Objectives

TBC provided eleven 12-month objectives, with progress metrics and targets in the following areas: zero safety incidents (2 objectives); safety training (2 objectives), hazard awareness and reporting (1 objective); recurring safety observation and refresher sharing (3 objectives); fire safety procedures and local fire department coordination (2 objectives); and standardize and enhance safety observation and assessment processes (1 objective).¹⁶

¹⁵Safety Culture Assessment Guidelines for Electrical Corporations:

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

¹⁶ See Section 7 for TBC's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

3.3.2 3-Year Objectives

TBC provided five 3-year objectives, with progress metrics and general targets in the following areas: fire safety/prevention safety stand downs (1 objective); coordination of fire safety knowledge with affiliates (1 objective); corporate safety and employee engagement survey participation (2 objectives); and continue its multi-year journey to achieve Occupational Safety and Health Administration (OSHA) Voluntary Protection Program (VPP) status (1 objective).¹⁷

3.3.3 Lessons Learned

TBC provided two major themes for its lessons learned, including 1. a recommitment to Enterprise Guiding Principles of: “all injuries are preventable, every day safety is my responsibility, leadership is accountable for preventing injuries, see something, say something, do something, and have a questioning attitude;” and 2. to cultivate a culture of continuous improvement.¹⁸

Following its first 2024 workplace safety incident, which occurred while performing at an offsite third-party location, TBC took actions that included a safety stand down, a full investigation, and enterprise-wide sharing of lessons learned. These actions led to after-action improvement items such as enhanced tail board practices, increased encouragement for hazard recognition, and reassessment of tasks and reassessment of equipment selection for job tasks in off-normal situations.

In alignment with cultivating a culture of continuous improvement, TBC focused on achieving internal corporate certification aligned with OSHA VPP standards for the Pittsburg station. TBC completed over 30 action items and conducted weekly safety meetings to address observed or potential safety hazards and site clean-up. Key action items that TBC completed include enhanced safety signage, improved equipment practices, site cleanup, and installation of new life safety equipment for all staff. Similar action items began at the Potrero station with a target to achieve internal corporate certification at this station by 2026.

3.3.4 Progress on the Previous Year’s Recommendations

In 2023, TBC received two recommendations in its 2023 SCA Report: 1. Encourage Safety Event Reporting and 2. Review and Refine Safety Culture Objectives.¹⁹

¹⁷ See Appendix A for TBC’s Safety Culture Objectives, Lessons Learned, and Progress on Previous Year’s Recommendations.

¹⁸ See Appendix A for TBC’s Safety Culture Objectives, Lessons Learned, and Progress on Previous Year’s Recommendations.

¹⁹ See Appendix A for TBC’s Safety Culture Objectives, Lessons Learned, and Progress on Previous Year’s Recommendations.

For progress on Recommendation 1, Encourage Safety Event Reporting, TBC reported the use of its “Zero Today” safety program to encourage the goal of zero work injuries and challenge its leadership and staff to think proactively about safety. TBC also reported the use of a corporate reporting tool “FOCUS1440”²⁰ to provide employees the ability to anonymously report near-miss incidents.

Since the last update, TBC conducted near-miss reporting training for its staff members and emplaced a suggestion box for employees to anonymously submit near-misses and potential/observed safety hazards.

For progress on Recommendation 2, Review and Refine Safety Culture Objectives, TBC reported that it revised its 12-month objectives to focus on: 1. sustaining emplaced practices; 2. refreshing training on reporting programs; and 3. refining data collection and documentation practices. TBC stated these efforts support continued employee engagement to maintain safety as a priority and to better align with its 3-year objectives. TBC revised its 3-year objectives to focus on: 1. positioning readiness for its OSHA VPP certification application; 2. maturing its fire prevention, risk awareness/knowledge; and 3. supporting enterprise level information gathering on corporate safety culture posture, employee safety perceptions and opportunities for improvement.

3.4 Interviews

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

3.5 Observational Visits

Energy Safety did not complete observational visits for its 2024 SCAs.

3.6 Supporting Documentation

TBC voluntarily appended ten supporting documents to provide additional context to its responses.²¹ TBC’s supporting documentation included: a “Corporate Safety Kickoff Message” from the beginning of 2023; an “All Injuries Are Preventable” poster; the lead page and an agenda from TBC-shared hosted safety meeting for transmission affiliates; its 2024 Safety Coin (two documents); TBC Safety Tailboard Form; the “Corporate Safety Page Safety Expectations”; a Corporate Guiding Principles graphic, a Top 10 Off Normal Situations Job Aid; and site safety photos.

²⁰ TBC’s reporting tool FOCUS1440 is based on a theme of 1,440 minutes in each day and the focus is to remain mindful of personal safety every minute of each day, at work, at home and at play.

²¹ See Appendix B for TBC’s Supporting Documentation.

4. Assessment Findings

The findings and recommendations below are based on TBC's safety culture objectives, lessons learned, and progress on the previous year's (2023) recommendations.²²

4.1 Strengths

Through its SCA inputs, TBC has demonstrated safety culture strengths in its vision and guiding principles, integration of safety communication, fire safety objectives, and the encouragement of safety event reporting. TBC should continue to build on these strengths to advance its safety culture.

4.1.1 Vision and Guiding Principles

TBC's inputs on its 2024 safety culture objectives, lessons learned, and progress on the previous year's recommendations²³ demonstrate TBC's dedication to advancing safety performance. TBC established a vision, identified progress metrics, and communicated this vision throughout all levels of the organization. TBC's "Guiding Principles" focus on prevention and engagement for all levels of the organization. In its report on progress on its previous year's recommendations, TBC reported these principles as: "1. All injuries are preventable; 2. Every day safety is my responsibility; 3. Leadership is accountable for preventing injuries; 4. See something, Say something, Do something; 5. Have a questioning attitude."²⁴ These principles are clear and support a culture of continuous improvement.

4.1.2 Integration of Safety Communications

In its progress on the previous year's recommendations, TBC detailed a supporting document, "Corporate Safety Kickoff Message," which notes that reporting unsafe conditions and near-misses is a safety expectation. TBC also detailed the placement of a suggestion box for employees to anonymously submit near-misses and potential/observed safety hazards.

TBC described other actions it took to address the recommendation of its previous year's SCA of "Establish targets and undertake actions that will increase hazard and near-miss reporting." These actions included its "Corporate Safety Kickoff Message," which encouraged reporting. TBC also reiterated the continued utilization of its "Health and Safety" channel in

²² See Appendix A for TBC's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

²³ See Appendix A for TBC's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

²⁴ See Appendix A for TBC's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

its internal online communication platform where employees can share health and safety news and identify potential hazards and solutions.

4.1.3 Safety Culture Objectives include Fire Safety and Progress toward OSHA VPP Status

TBC included fire safety measures, as well as objectives related to OSHA VPP status, in its 2024 12-month and 3-year safety culture objectives.²⁵

In TBC's 12-month safety culture objective "Annual Fire Department Site Visit", TBC stated it completed an annual fire department site visit. Further, HWT reiterated its intention to maintain familiarity with 1) TBC station; 2) potential fire risks and on-site fire suppression resources and capabilities; 3) access, ingress and egress routes; and 4) alignment of TBC and local fire department emergency response procedures and responsibilities. In TBC's 12-month safety culture objective "Annual Fire Drill," TBC outlines its plan for operational staff to conduct a fire drill annually, ensuring that staff understand how to execute fire safety procedures in the event an ignition of fire occurs.

In TBC's 12-month safety culture objective "Enhanced Safety Training," TBC stated its intention to ensure operational staff are trained in the use of on-site suppression equipment ("suppression resources"). In addition, TBC's 12-month safety culture objective "Annual Fire Drill," outlines its plan for operational staff to conduct a fire drill annually, ensuring that staff understand how to execute fire safety procedures in the event an ignition occurs. Carried over from its 2023 objectives, TBC states its intention to have staff trained in providing cardiopulmonary resuscitation (CPR), using an automated external defibrillator (AED), and responding to emergency situations.

In TBC's 3-year safety culture objective "Creation of Periodic Fire Season Safety Stand Down," TBC states its intention to hold a meeting annually before fire season to assess the need for training, review any planned projects that may impact fire safety, and assess or schedule the assessment of fire prevention and suppression equipment. In TBC's 3-year safety culture objective "Increase Coordination of Fire Safety Knowledge/Program with Affiliates," TBC outlines a plan to create an annual round table that will enable its affiliates to share "fire prevention and related risk reduction techniques and experience."²⁶

In 2024, TBC added a 3-year safety culture objective "Continue multi-year journey toward achieving OSHA Voluntary Protection Program (VPP) status." TBC expects its continued objective of obtaining OSHA VPP status will show its commitment to maintaining a high level of safety across operations, which includes work protocols that promote safety through risk

²⁵ See Appendix A for TBC's Safety Culture Objectives.

²⁶ See Appendix A for TBC's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

reduction related to situations where a fire could be instigated by utility equipment or operations.²⁷

4.1.4 Encouraging Safety Event Reporting

In its progress on the previous year's recommendations and lessons learned, TBC includes its "Zero Today" philosophy, which is premised on zero injuries and encourages safety event reporting. Reporting of near-misses and observed safety hazards creates opportunities for lessons learned and improves hazard awareness mitigation, amongst other things. TBC also stated that reporting is not only encouraged by the Zero Today philosophy, but is expected, as evidenced by the Corporate Safety Kickoff Message.

In addition to the suggestion boxes now in use for near-miss reporting, TBC team members can also submit near-misses anonymously through TBC's corporate reporting tool "FOCUS1440," which replaced its Safety Activity Management (SAM) tool. The FOCUS1440 theme is that there are 1,440 minutes each day and the focus is to remain mindful of personal safety every minute of each day, at work, at home, and at play. Although no near-misses were reported, TBC states the reporting tool will be useful in the future to facilitate learning.

In 2024, TBC experienced its first workplace safety incident. TBC reported that "an employee was injured while performing off normal work at an offsite third-party location". TBC conducted a safety stand down to make all 17 staff members aware of injury occurrence. TBC performed a full investigation, a documentation of injury, an analysis of missed injury avoidance opportunities and lessons learned. Lessons learned were shared with all transmission division staff and enterprise-wide operations leadership to support improved hazard recognition and mitigation. After-action items included improved tailboard practices to account for changed circumstances/environments, additional encouragement for active participation in hazard recognition, and reassessment of job tasks and equipment selection for job tasks occurring in abnormal situations.²⁸

4.2 Opportunities

Based on TBC's SCA inputs, TBC has two areas where it can strengthen its safety culture. The following section describes the areas where TBC should prioritize improving its safety culture.

4.2.1 Safety Event Reporting

In TBC's 2024 12-month safety culture objective "Ensure Safe Behavior at Job Site," TBC focuses on increasing hazard awareness.²⁹ Its 12-month target is "0 safety incidents or near-

²⁷ See Appendix A for TBC's Safety Culture Objectives.

²⁸ Tailboards or tailgates are crew meetings at worksites where project-specific safety briefings take place.

²⁹ See Appendix A for TBC's Safety Culture Objectives.

misses.”³⁰ Striving for zero near-miss incidents, which translates to zero near-miss reports, is not conducive to advancing safety culture because a zero-event target may discourage safety event reporting in an effort to achieve the target. TBC clarified that its “Zero Today” philosophy is premised on zero injuries, as opposed to zero reporting. While this distinction is helpful, it still falls under the category of a ‘zero’-related target and fails to consider its impact on reporting. Further, TBC’s objectives include a target of zero safety incidents, not just injuries. Objectives must be actionable, and zero incident and near-misses are targets without actionable steps necessary to achieve them. TBC’s 12-month objectives also include “Zero Employee Safety and Health Incidents” and “Zero Motor Vehicle Safety Incidents” objectives. As noted above, a zero-event approach may discourage safety event reporting. The objectives did not include specific measures to encourage safety event reporting. This concern has been consistently emphasized since 2022, and there is still room for improvement.

TBC has a 12-month safety culture objective titled “Near-miss and Safety Hazard Refresher Training,” which is designed to reinforce the importance of near-miss and safety hazard reporting to staff to achieve zero workplace injuries. While the objective contains a 100% training completion rate, it does not advance the development of a responsive culture. Further, the zero-incident target undermines the value and purpose of the training objective. The quality of trainings should be revolved around encouraging and improving reporting.

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

4.2.2 Safety Culture Objectives

While TBC’s 2024 safety culture objectives are sufficiently defined and specific in their targets, it remains unclear how TBC’s 12-month objectives represent milestones on the way to longer-term achievements represented by its 3-year objectives. While the collection of data can be an important tool, active participation by all members of an organization is imperative to changing the landscape of an organization. Communication on all levels can aid the transition to a safer workplace culture.

This has been a continued recommendation since 2022. Failure to address this observation will stall progress toward long-term improvement in TBC’s safety culture.

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

³⁰ Safety Culture Assessment Guidelines for Electrical Corporations:
<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57736&shareable=true>, (accessed Dec. 18, 2024).

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 TBC 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 TBC.³¹

5.1 Encourage Safety Event Reporting

TBC should continue to foster a sense of safety, including psychological safety, among its workers, such that workers feel safe to report mistakes and near-misses. The use of a target objective for zero safety events may discourage reporting. Therefore, TBC should continue progress towards meeting the recommendations of 2023 and evaluate the value of objectives that incorporate leading indicators,³² such as the percentage of the workforce trained on safety event reporting or the number of safety observations in the field, alongside lagging indicators,³³ such as the number of injury reports.

TBC should move away from a zero safety-event objective. TBC should encourage early and frequent event reporting and promotes other proactive safety behaviors.

While TBC noted progress from 2023 in its progress on the previous year's recommendations regarding safety event reporting, HWT should strive for continued gains regarding safety reporting.

5.1.1 Observation

TBC's 2024 12-month safety culture objectives related to this issue were the same as reported in 2023 and included "Ensure Safe Behavior at Job Site" with an associated target of "0 Safety Incidents or near-misses." Other objectives with a zero safety-event target included "Zero Employee Safety and Health Incidents" and "Zero Motor Vehicle Safety Incidents."

³¹ Energy Safety's 2023 SCA Report for TBC: :

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53796&shareable=true>, (accessed Dec. 18, 2024).

³² Safety Culture Assessment Guidelines for Electrical Corporations:

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

³³ Safety Culture Assessment Guidelines for Electrical Corporations:

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

5.1.2 Goals of Recommendation

The goal of this recommendation is for TBC to further encourage early and frequent safety event reporting and in so, increasing its capacity as a learning organization.³⁴

5.1.3 Verification Method

In TBC's next progress on previous year's recommendations, TBC must provide an update on its efforts to encourage safety event (hazard and near-miss) reporting. TBC must report the number of event reports since 2023, by year. It must describe any new efforts to encourage workers to report safety events, including training on reporting protocols.

5.2 Review and Refine Safety Culture Objectives

TBC should continue to review its safety culture objectives and ensure that its 12-month objectives build toward its 3-year objectives.³⁵ This recommendation is repeated from Energy Safety's 2022 and 2023 SCA Reports for HWT.

5.2.1 Observation

TBC stated it "will continue to review and assess [objectives] in subsequent iterations of its safety culture assessment."³⁶ Although this recommendation has continued since 2022, it is still unclear how TBC's 12-month objectives build toward its 3-year objectives.

5.2.2 Goal of Recommendation

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

5.2.3 Verification Method

In its next SCA safety culture objectives, TBC 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.

³⁴ Safety Culture Assessment Guidelines for Electrical Corporations, Glossary-2: The term Learning organization is defined as "An organization skilled at creating, acquiring, and transferring knowledge, and at modifying its behavior to reflect new knowledge and insights"

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

³⁵ See Appendix A for TBC's Safety Culture Objectives.

³⁶ See Appendix A for TBC's Safety Culture Objectives.

6. Conclusion

This report provides the findings and recommendations from Energy Safety's 2024 SCA Report for TBC, its fourth under Public Utilities Code section 8389(d)(4). Following the publication of this report, TBC 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 TBC. Energy Safety evaluates an electrical corporation's safety culture to identify best practices and relative gaps. This process includes understanding TBC's relative strengths and opportunities in designing and implementing a strong safety culture. As stated above, Energy Safety assesses safety culture outcomes over time and incorporates continuous learning into the SCA process.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



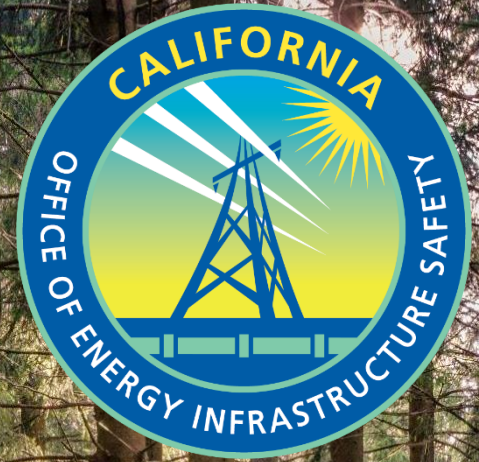
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APPENDICES



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



OFFICE OF ENERGY
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Safety Culture Objectives, Lessons Learned, and Progress on the Previous Year's Recommendations

January 2025

Trans Bay Cable



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

Zero Employee Safety and Health Incidents

B1. Progress Metrics

Number of OSHA Recordable Injuries
Annual Training for Employees

C1. 12-Month Target

0
100%

D1. Description of Objective

Ensures employees understand the components of Safety and current metrics.
Zero safety incidents puts the focus on employing enterprise guiding principles for pre-work planning, situational awareness safe work habits, and post-job reviews with the goal that all injuries are preventable. Near miss incidents and safety hazards reported and analyzed for corrective actions to limit likelihood of actual safety incident occurring. Review of Edge bulletins re: safety incidents across the enterprise support improved hazard recognition and mitigation.
Zero injuries translates to reduced risk in operations thus reducing risk to public and fire risk.

A2. Objective

Zero Motor Vehicle Safety Incidents

B2. Progress Metrics

Number of preventable accidents
Employee Review of Smith Driving Video(s)

C2. 12-Month Target

0
100%

D2. Description of Objective

Employees practice active safe driving behaviors which directly translates to reduce risk to public and reduction in likelihood of a vehicle accident instigating a fire. Near miss incidents reported and analyzed for corrective actions to limit likelihood of actual safety incident occurring. Review of Edge bulletins re: vehicle incidents across the enterprise support improved hazard recognition and mitigation.

A3. Objective

100% Contractor Safety Training

B3. Progress Metrics

Number of contractors receiving site safety training

C3. 12-Month Target

100% trained

D3. Description of Objective

Ensures contractors are familiar with the stations, that the contractors understand the fire related requirements, align work performance with site safety procedures and are prepared for the planned work and contingencies.

This activity supports risk reduction of utility equipment instigated fire or contractor work instigating a fire both of which could pose a risk to employees and the public

A4. Objective

Near-miss and Safety Hazard Refresher Training

B4. Progress Metrics

Provide refresher training on near miss identification and reporting training to all staff members including managers

Provide safety hazard reporting training to employees

C4. 12-Month Target

Provision of refresher training to all staff members including managers on near miss identification and reporting and safety hazard reporting

100% trained

D4. Description of Objective

Refresher to remind/reengage staff on the importance of near-miss and safety hazard reporting in effort to achieve zero workplace injuries. Documentation will improve tracking of lessons learned and further support risk reduction efforts. In addition, this activity fosters organizational culture themes (See something, say something, do something and Have a questioning attitude) that supports open discussion of potential near-miss events or potential/present safety hazards which could pose a risk to employee and the public due to fire risk.

A5. Objective

Safety Training Refresher

B5. Progress Metrics

CPR Training

C5. 12-Month Target

100% Staff CPR certified

100% Staff trained on use of AED and LifeVac and related emergency response techniques

D5. Description of Objective

Staff trained on providing CPR, use of AED, use of LifeVac and responding to emergency situations improves ability of staff to respond quickly and efficiently in emergency situations and provide aid if able. LifeVac is a portable, non-invasive airway clearance device that uses a suction mechanism to remove obstructions from the airway in choking emergencies when traditional methods are unavailable or ineffective.

A6. Objective

Ensure Safe Behavior at Job Site

B6. Progress Metrics

Safety tailboards reinforce hazard awareness and recognition training by requiring on-site field personnel to do job-specific identification of hazards and discussion of mitigating actions when required by job tasks. Identification of fire risks related to job specific tasks is part of the daily safety briefings and fire risk and weather are considered as part of work planning activities e.g. high-heat day work limitations. Safety objectives in each field employee's annual performance goals to ensure adherence to the safety program.

Safety observations conducted by staff to provide opportunity for peer review of safe work behaviors and opportunities for improvement.

C6. 12-Month Target

0 Safety Incidents

100% Reporting of near misses

Minimum 30 tailboards per year

Minimum 12 safety observations per year

D6. Description of Objective

Ensure employees are employing hazard awareness techniques to reduce risk to themselves, and the public, including the risk of a utility equipment instigated ignition. In addition, employees are equipped with multiple human performance related tools (e.g. STAR (Stop Think Act Review) technique, 2-minute review, tailboarding) to ensure they are actively identifying hazards and mitigating actions to prevent errors that have a potential to cause equipment instigated ignition. Any safety incidents are reviewed for corrective actions to limit or prevent repeat occurrence. Near misses and safety hazards are reported and reviewed as opportunities for improving hazard awareness and safety protocols with corrective actions implemented as needed. Safety observations provide opportunities for peer review of safe work behaviors. Participation in enterprise wide safety stand-downs to review material safety incidents to support improved hazard recognition, mitigation and other lessons learned. These actions translate to reducing the likelihood of a fire incident occurring by improving safety protocols which are designed to limit the occurrence of such events.

A7. Objective

Safety Share Moment

B7. Progress Metrics

Perform a safety share at meetings

C7. 12-Month Target

Start every meeting with more than 3 persons with a short safety share or observation

D7. Description of Objective

Safety moments provide an opportunity for employees to recognize a safety observation or concern that might be of particular import. This moment serves as an additional reminder to keep safety at the forefront of all workplace activity

A8. Objective

Continued Participation in Monthly Safety Shares Across Transmission Division

B8. Progress Metrics

Participate in monthly safety shares across transmission division to draw on experiences and knowledge of affiliates

C8. 12-Month Target

Attendance and participation in monthly safety meetings hosted by TBC and other affiliates across corporate enterprise

D8. Description of Objective

Participation in monthly safety meetings hosted in a round-robin style by TBC and other operating affiliates across the corporate enterprise increases employee exposure to and knowledge of:

- safety processes and procedures;
- utilization of new techniques, PPE and equipment; and
- situational awareness/response.

This serves to increase knowledge basis of employees and enhance awareness of the value and importance of safe work practices which directly impact the reduction of risk to employee and public health and safety.

A9. Objective

Annual Fire Drill

B9. Progress Metrics

Complete annual fire drill

C9. 12-Month Target

Annual fire drill completed

D9. Description of Objective

Ensures operational staff have conducted the annual fire drill which ensures that personnel understand how to execute fire safety procedures and process in the event an ignition or fire occurs. This fire drill also includes execution of emergency response protocols as described in the company's 2023-2025 Wildfire Mitigation Plan.

A10. Objective

Annual Fire Department Site Visit

B10. Progress Metrics

Annual Fire Department Site Visit

C10. 12-Month Target

Site Visit Completed

D10. Description of Objective

This efforts maintains local fire department familiarity with TBC station, potential fire risks, on site fire suppression resources and capabilities, access, ingress and egress routes, alignment of TBC and local fire department emergency response procedures and responsibilities. This effort supports efficient response to emergency situation.

A11. Objective

Standardize process on current collection of safety observations/assessments
Enhanced focus on safety observations/assessments

B11. Progress Metrics

Collect metrics on peer and supervisor safety observations/assessments

C11. 12-Month Target

100% collection of peer and supervisor safety observations/assessments

D11. Description of Objective

Completion of this objective will allow TBC to better track the consistency of peer and supervisor safety observations/ assessments, document areas of improvement as needed, and support development of potential new training elements, as needed.

This objective will ensure that current safety protocols which are designed to reduce risk of a safety event occurring (or near-miss), are being followed and are effective; and will support improvements to safety training as needed.

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

Creation of Periodic Fire Season Safety Stand Down

B1. Progress Metrics

Attendance to Fire Safety Stand Down

C1. 3-Year Target

Hold periodic pre-fire season safety standdown

D1. Description of Objective

Safety stand down will be opportunity to meet before the start of the fire season to focus on fire-prevention, assess any needed training or update thereto, review any planned projects which may impact fire safety, assess or schedule assessment of fire prevention and suppression equipment

A2. Objective

Increase Coordination of Fire Safety Knowledge/Program with Affiliates

B2. Progress Metrics

Regular sharing of fire prevention and related risk reduction techniques and experience amongst affiliates

C2. 3-Year Target

Hold annual fire safety/prevention round table meeting

D2. Description of Objective

Creation of annual fire safety/prevention meeting with affiliates will provide an opportunity to share fire prevention practices and schema with entities that have differing risk profiles and operational experience which will aid in the expanding knowledge base of employees in fire prevention and risk reduction techniques, procedures and equipment

A3. Objective

Increase participation Corporate Safety Survey

B3. Progress Metrics

Develop reporting mechanism to track % of participation in safety survey

C3. 3-Year Target

At least 90% participation in corporate wide employee safety survey

D3. Description of Objective

2024 was the first year safety survey was administered enterprise-wide, with goal of the survey occurring every 2 years. It will feature more targeted safety questions. Corporate leadership will utilize responses to determine trends and target areas for improvement at the enterprise level.

A4. Objective

Employee Engagement Survey (Safety Dimension)

B4. Progress Metrics

Responses to Employee Engagement - Safety Dimension

C4. 3-Year Target

Maintain or improve current score

D4. Description of Objective

Survey is taken approximately every 2 years and measure the percentage of employees that agree with statements such as: "Employee safety is a top concern of my immediate supervisor", "I have the tools and training to do my job safely", and "I feel safe and secure in the workplace".

A5. Objective

Continue multi-year journey toward achieving OSHA (Voluntary Protection Program (VPP)) status

B5. Progress Metrics

Completion of internal corporate review/certification of Potrero station site as meeting OSHA VPP requirements

Completion of internal corporate review of sustainment of OSHA VPP requirements and internal readiness sustainment assessment to procure company leadership approval to begin OSHA VPP journey

C5. 3-Year Target

Company on-track to submit application for OSHA VPP

D5. Description of Objective

OSHA VPP status represents that a business has achieved implementation of effective safety and health management systems and maintain injury and illness rates below national Bureau of Labor Statistics averages for their respective industries.

Completion of this objective will evidence a continued commitment to maintaining a high level of safe operations which includes safe and risk reducing work protocols as they pertain to situations where a fire could be instigated by utility equipment or operations.

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

A1. Major Theme/ Lesson Learned 1

Recommitment to Enterprise Guiding Principles: All injuries are preventable, Every day safety is my responsibility, Leadership is accountable for preventing injuries, See something, Say something, Do something, and Have a Questioning Attitude

B1. Actions Taken

In 2024, TBC experienced its first workplace safety incident. An employee was injured while performing off normal work at an offsite third party location. After employee received the appropriate medical attention, TBC conducted a safety stand down to make all 17 staff members aware of injury occurrence. Company subsequently performed a full investigation, documentation of injury, analysis of missed injury avoidance opportunities and lessons learned. Full injury circumstance analysis and lessons learned shared with transmission division staff and enterprise wide operations leadership in effort to support improved hazard recognition, mitigation and other lessons learned enterprise wide. After action items, included improved tailboarding practices to account for changed circumstances/environments (See something, Say something, Do something), additional encouragement for active participation in hazard recognition (Have a Questioning Attitude), and reassessments of job tasks and equipment selection for job tasks occurring in off normal situations (Leadership is accountable for preventing injuries).

A2. Major Theme/ Lesson Learned 2

Cultivate a Culture of Continuous Improvement

B2. Actions Taken

A primary focus for 2024 was attaining internal corporate certification for meeting requirements similar to OSHA VPP status for Pittsburg station site. This entailed a concerted effort to complete over 30 action items, and weekly all hands meeting to address any observed or potential safety hazards and site clean up. Actions taken included: (1) enhanced safety signage, (2) improved equipment handling and storage practices, (3) newly emplaced equipment such as fire cabinets, chemical storage, and ladder hangers, (4) general station site and office clean up which including such activities as amelioration or mitigation of tripping hazards, demarcation of no storage areas, removal of obsolete equipment/materials and (5) siting of additional life safety equipment (AED, and LifeVac anti choking devices). All employees regardless of position issued new safety equipment including hard hats, high visibility vests, protective glasses, cut-resistant gloves and provided allotment for safety boots. Similar actions items above were begun at the Potrero station site with a goal of attaining internal corporate certification for meeting requirements similar to OSHA VPP status for that site in 2026.

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

A1. Recommendation 1

Encourage Safety Event Reporting

B1. Actions Taken

Zero Today is based on a philosophy that all injuries are preventable. As such the focus is on challenging both leadership and staff to think proactively about safety with the goal of having zero work injuries. "Zero Today" is not premised on zero reporting but zero injuries. Reporting of near misses, observed safety hazards, etc. create opportunities for lessons learned, improved hazard awareness recognition, and hazard mitigation amongst other things. Thus reporting is not only encouraged by the Zero Today philosophy but is expected as evidenced by supporting document titled "Corporate Safety Kickoff Message" which notes that reporting unsafe conditions and near misses is a safety expectation. TBC refers also to supporting document titled "AIAP Poster" which notes the review of near misses as 'missed opportunities to predict and prevent' in furthering the goal of achieving zero injuries.

Subsequent to the last reporting, TBC conducting near miss reporting training for its 17 staff members and emplaced a suggestion box for employees to anonymously submit near misses and potential/observed safety hazards. The suggestion box is in addition to staff ability to post on the company's MS Teams Health and Safety Channel, ability to communicate directly with manager or company's Sr. Health & Safety Specialist, and the ability to submit anonymously through the corporate reporting tool "FOCUS1440" which replaced the Safety Activity Management (SAM). The FOCUS1440 theme is that there are 1,440 minutes in each day and the focus is to remain mindful of personal safety every minute of each day, at work, at home and at play.

Safety hazards observations were not independently tracked as they were incorporated in action items and improvements associated with achieved OSHA VPP status for Pittsburg site as described below. No near misses were reported. TBC did have one safety incident in 2024 and it was reported in Focus1440. Please see lessons learned tab for more information.

C1. Results

Near miss reporting training conducted and refresher training to occur in 2025. Suggestion box for anonymous submittal of near misses and potential/observed safety hazards emplaced at main employee work location. This is additional to other emplaced modes of communicating near misses and potential/observed safety hazards.

A2. Recommendation 2

Review and Refine Safety Culture Objectives.

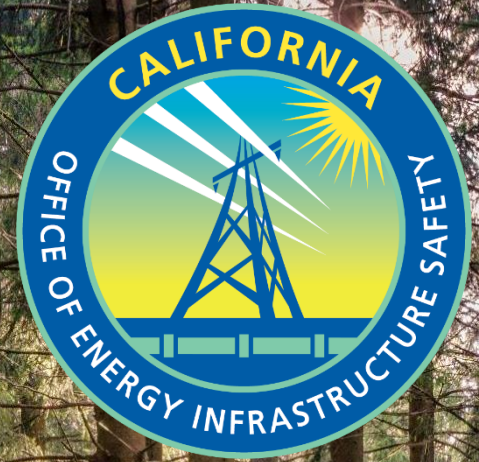
B2. Actions Taken

Revised Objectives (12 months) focus on sustainment of emplaced practices, refreshing of training on reporting programs and refining data collection and documentation practices. These efforts support the continued engagement of staff in maintaining safety as a top company priority and supporting longer term objectives described below.

Revised Objectives (3 years) focus on (1) positioning readiness for OSHA VPP certification application, (2) maturing fire risk awareness/knowledge program, and (3) supporting enterprise level information gathering on corporate safety culture posture, employee safety perceptions and opportunities for improvement.

C2. Results

TBC has made changes to its current 12 month objectives to better align with its 3 year objectives and will continue to review and assess in subsequent iterations of its safety culture assessment.



APPENDIX B: Supporting Documentation



OFFICE OF ENERGY
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Supporting Documentation

January 2025

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TBC
2024 Safety Culture Assessment

Section 2. Supporting Documentation

The supporting documentation submitted by TBC will be published at a later date.