



December 19, 2025

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**Subject: 2024 Safety Culture Assessment for Horizon West Transmission, LLC**

Mr. Morgan:

Enclosed is the 2024 Safety Culture Assessment (SCA) for Horizon West Transmission, LLC (HWT) 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).

HWT 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 HWT 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 HORIZON WEST**

**TRANSMISSION**

December 2025



# TABLE OF CONTENTS

Executive Summary .....	2
1. Introduction .....	3
1.1 Focus of Energy Safety’s SCA.....	3
2. Methodology .....	4
2.1 Safety Culture Assessment Framework .....	4
2.2 Energy Safety SCA Process Elements .....	4
3. Assessment Inputs.....	6
3.1 Workforce Survey .....	7
3.2 Management Self-Assessment .....	7
3.3 Safety Culture Objectives, Lessons Learned, and Progress on the Previous Year’s SCA Recommendations .....	7
3.4 Interviews .....	8
3.5 Observational Visits .....	8
3.6 Supporting Documentation.....	8
4. Assessment Findings.....	9
4.1 Strengths .....	9
4.2 Opportunities .....	11
5. Recommendations .....	13
5.1 Encourage Safety Event Reporting.....	13
5.2 Review and Refine Safety Culture Objectives .....	14
6. Conclusion .....	16
Appendices.....	
Appendix A.....	A1
Appendix B.....	B1

# Executive Summary

The Office of Energy Infrastructure Safety's (Energy Safety) 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 conduct 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 Horizon West Transmission's (HWT's) inputs into its 2024 Safety Culture Assessment and associated findings, and recommendations. The safety culture assessment findings and recommendations are based on HWT'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 2021, 2022, 2023 and 2024, HWT has maintained a safety vision and guiding principles, along with effective integration of safety communications throughout the organization.

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

## **Recommendations**

### **Recommendation 1: Encourage Safety Event Reporting**

HWT should continue to establish targets and undertake actions to increase hazard and near-miss<sup>3</sup> reporting, instead of aiming for zero near-miss events. HWT leadership and frontline supervisors should encourage workers to report hazards and near-misses. This

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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 HWT's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations

<sup>3</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).



recommendation continues a recommendation from Energy Safety's 2023 SCA Report for HWT.<sup>4</sup>

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

HWT 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 HWT.

## **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>5</sup> Pursuant to Public Utilities Code section 8389(d)(4),<sup>6</sup> Energy Safety must conduct an annual SCA for each California electrical corporation.<sup>7</sup> The first safety culture assessment process was adopted by the CPUC on November 19, 2020, in Resolution WSD-011.<sup>8</sup> 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 implementing a strong safety culture. Energy Safety assesses safety culture outcomes over time and incorporates continuous learning into the safety culture assessment findings.

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<sup>4</sup> Energy Safety's 2023 SCA Report for HWT:

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56374&shareable=true>, (accessed Dec. 18, 2024).

<sup>5</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>6</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>7</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>8</sup> 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).

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.<sup>9</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>10</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>11</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

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<sup>9</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>10</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>11</sup> In this document "utility" means "electrical corporation".



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.”<sup>12</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.

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<sup>12</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).

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.<sup>13</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>14</sup> An electrical corporation may voluntarily submit supporting documentation to provide additional context to its responses.

## 3. Assessment Inputs

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

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<sup>13</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>14</sup> Safety Culture Assessment Guidelines for Electrical Corporations:

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



## 3.1 Workforce Survey

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

## 3.2 Management Self-Assessment

As an ITO, HWT 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, HWT submitted its safety culture objectives, lessons learned, and progress on the previous year's (2023) recommendations.

### 3.3.1 12-Month Objectives

HWT provided nine 12-month objectives, with progress metrics and target goals 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 (2 objectives); fire safety procedures and local fire department coordination (2 objectives).<sup>15</sup>

### 3.3.2 3-Year Objectives

HWT provided four 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).<sup>16</sup>

#### 3.3.2.1 Lessons Learned

HWT provided one major theme for its lessons learned, consisting of a recommitment to its 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."<sup>17</sup>

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<sup>15</sup> See Appendix A for HWT's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

<sup>16</sup> See Appendix A for HWT's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

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

HWT took action to discuss its guiding principles monthly with its business unit, at safety post-event calls, and in corporate safety messaging and activities.

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

In 2023, HWT received two recommendations in its 2023 SCA report: 1. Encourage Safety Event Reporting and 2. Review and Refine Safety Culture Objectives.<sup>18</sup>

For progress on Recommendation 1, Encourage Safety Event Reporting, HWT 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. HWT also reported the use of corporate safety messaging to reinforce the expectations of near-miss and unsafe conditions reporting and the use of a corporate reporting tool “FOCUS1440” which provides employees the ability to anonymously report near-miss incidents.

For progress on Recommendation 2, Review and Refine Safety Culture Objectives, HWT reported that it revised its 12-month objectives to 1. focus on refreshing safety training and 2. to sustain current practices. HWT stated these efforts support continued employee engagement to maintain safety as a priority, and to better align with its 3-year objectives. HWT revised its 3-year objectives to focus on 1. maturing its fire awareness risk awareness/knowledge and 2. supporting enterprise level information gathering on corporate safety culture posture, employee safety perceptions, and opportunities for improvement.

## 3.4 Interviews

As an ITO, HWT 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

HWT voluntarily appended nine supporting documents to provide additional context to its responses.<sup>19</sup> HWT's supporting documentation included a “Corporate Safety Kickoff Message” from the beginning of 2023; an “All Injuries Are Preventable” poster; the lead page and agenda from HWT-shared hosted safety meeting for transmission affiliates; its 2024 Safety Coin; the “Corporate Safety Page Safety Expectations”; a Top 10 Off Normal Situations Job Aid; and site safety photos. HWT's supporting documents also included a graphic depicting HWT's Guiding Principles.

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

<sup>19</sup> See Appendix B for HWT's Supporting Documentation.



## 4. Assessment Findings

The findings and recommendations below are based on HWT's safety culture objectives, lessons learned, and progress on the previous year's (2023) recommendations.<sup>20</sup>

### 4.1 Strengths

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

#### 4.1.1 Vision and Guiding Principles

HWT's input on its 2024 safety culture objectives, lessons learned, and progress on the previous year's recommendations<sup>21</sup> demonstrate HWT's dedication to advancing safety performance. HWT established a vision, identified progress metrics, and communicated this vision throughout all levels of the organization. HWT's "Guiding Principles" focus on prevention and engagement for all levels of the organization. In its report on progress on its 2023 recommendations, HWT 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."<sup>22</sup> 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, HWT detailed a supporting document, "Corporate Safety Kickoff Message," which notes that reporting unsafe conditions and near-misses are safety expectations. HWT also provided a summary of the types of safety communication shared at its enterprise level, including bi-annual leadership workshops, a "Monthly Safety Connect," and safety messaging, or "safety moment," at the start of meetings (e.g., concerning weather or traffic).<sup>23</sup>

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

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

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

<sup>23</sup> The "Safety Share Moment" is described in the 12-month objective of that name (HWT's 12-month Objective 6) as follows: "Safety [share] 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." See Section 5 for HWT's safety culture objectives.

Effective safety communication is a two-way process, and HWT has identified the need for employees to communicate with corporate leadership; HWT states this will be accomplished through its Corporate Safety Survey and Employee Engagement Survey every two years. The Corporate Safety and Employee Engagement Survey will feature more targeted safety questions, and corporate leadership will utilize responses to determine trends and target areas for improvement at the enterprise level.

### 4.1.3 Fire Safety and CPR Training Objectives

HWT included fire safety measures, as well as cardiopulmonary resuscitation (CPR) training, in its 2024 12-month safety culture objectives.<sup>24</sup>

In HWT's 12-month safety culture objective "Annual Fire Department Site Visit", HWT stated it completed an annual fire department site visit. Further, HWT reiterated its intention to maintain familiarity with 1. local fire department Suncrest station, 2. potential fire risks and on-site fire suppression resources and capabilities, 3. access, ingress and egress routes, and 4. alignment of HWT and local fire department emergency response procedures and responsibilities. In HWT's 12-month safety culture objective "Annual Fire Drill," HWT 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 HWT's 3-year safety culture objective "Creation of Periodic Fire Season Safety Stand Down," HWT 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 HWT's 3-year safety culture objective "Increase Coordination of Fire Safety Knowledge/Program with Affiliates," HWT 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."<sup>25</sup>

Carried over from its 2023 objectives, HWT states its intention to have staff trained in providing cardiopulmonary resuscitation (CPR), using an automated external defibrillator (AED), and responding to emergency situations.

### 4.1.4 Encouraging Safety Event Reporting

In its progress on the previous year's recommendations and lessons learned, HWT 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. HWT also

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<sup>24</sup> See Appendix A for HWT's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

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



stated that reporting is not only encouraged by the Zero Today philosophy, but is expected, as evidenced by its Corporate Safety Kickoff Message.

In the progress on the previous year's recommendations and lessons learned, HWT reported that the "Transmission division had one safety incident reported by an affiliate. HWT team members participated in the affiliate's presentation of the event and lesson learned to improve and refocus on hazard awareness and job task review techniques."<sup>26</sup> This is an example of the value that event reporting can have and the importance of implementing lessons learned.

HWT team members can submit safety events anonymously through its corporate reporting tool "FOCUS1440," which replaced its Safety Activity Management (SAM). The FOCUS1440 concept 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, it provides a useful mechanism in the future to facilitate reporting and learning at HWT.

As HWT has limited staff (i.e., two individuals), each field engineer is empowered to correct potential/observed safety hazard in the moment. HT stated that staff will actively record any potential or observed safety hazard and any amelioration or mitigation thereof.

## 4.2 Opportunities

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

### 4.2.1 Safety Event Reporting

In HWT's 2024 12-month safety culture objective "Ensure Safe Behavior at Job Site," HWT focuses on increasing hazard awareness and recognition training.<sup>27</sup> Its 12-month target is "0 Safety Incidents or near-misses."<sup>28</sup> Striving for zero near-miss incidents, which translates to zero near-miss reports, is not conducive to advancing safety culture because a zero-event objective may discourage safety event reporting in an effort to achieve the goal. It is important to shift away from 'zero'-related objectives to prevent possible incentivizing of non-reporting. HWT clarified that its "Zero Today" philosophy is premised on zero injuries, as opposed to zero reporting. While this distinction is helpful, this target still falls under the category of 'zero'-related objectives and fails to consider its impact on reporting. Further,

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<sup>26</sup> See Appendix A for HWT's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

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

<sup>28</sup> Safety Culture Assessment Guidelines for Electrical Corporations:

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

HWT's objectives include zero safety incidents, not just injuries. This concern has been consistently emphasized since 2022, yet there is still room for improvement.

HWT's 12-month objectives also include "Zero Employee Safety and Health Incidents" and "Zero Motor Vehicle Safety Incidents." As noted above, a zero-event approach may discourage safety event reporting. The objectives did not include explicit measures to encourage safety event reporting. The objective "Zero Employee Safety and Health Incidents" included a progress metric of an annual training instead of an objective to increase the reporting of hazards. The "Ensure Safe Behavior at Job Site" objective included the metric of reinforcing hazard identification training at safety tailboards.

Refer to Section 5.1 of this report for the recommendation that pertains to this opportunity.

#### **4.2.2 Safety Culture Objectives**

While HWT's 2024 safety culture objectives are sufficiently defined and specific in their targets, it remains unclear how HWT'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 HWT's safety culture.

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

## 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 HWT 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 HWT.<sup>29</sup>

### 5.1 Encourage Safety Event Reporting

HWT 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 could promote a lack of reporting. Therefore, HWT should continue progress towards meeting the recommendations of 2023 and evaluate the value of leading indicators,<sup>30</sup> such as the percentage of the workforce trained on safety event reporting or the number of safety observations in the field, alongside lagging indicators,<sup>31</sup> such as the number of injury reports.

HWT should move away from a zero safety-event objectives and targets. HWT should encourage early and frequent event reporting and incentivize other proactive safety behaviors.

While HWT 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

HWT's 2024 12-month safety culture objectives related to this issue were the same as reported in 2023 and included the objective "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."

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<sup>29</sup> Energy Safety's 2023 SCA Report for HWT:

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56374&shareable=true>, (accessed Dec. 18, 2024).

<sup>30</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>31</sup> 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 Goal of Recommendation

The goal of this recommendation is for HWT to further encourage early and frequent event reporting and in doing so, increase its capacity as a learning organization.<sup>32</sup>

### 5.1.3 Verification Method

In HWT's next progress on the previous year's recommendations, HWT must provide an update on its efforts to encourage safety event (hazard and near-miss) reporting. HWT must report the number of event reports from 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

HWT should continue to review its safety culture objectives and ensure that its 12-month objectives build toward its 3-year objectives.<sup>33</sup> This recommendation is repeated from Energy Safety's 2022 and 2023 SCA Reports for HWT.

### 5.2.1 Observation

HWT stated that it "will continue to review and assess [objectives] in subsequent iterations of its safety culture assessment."<sup>34</sup> Although this recommendation has continued since 2022, it is still unclear how HWT's 12-month objectives build toward its 3-year objectives.

### 5.2.2 Goal of Recommendation

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

### 5.2.3 Verification Method

In its next SCA safety culture objectives, HWT must provide 3-year safety culture objectives that are different than and directly supported by 12-month objectives. This should result in

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<sup>32</sup> 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).

<sup>33</sup> See Appendix A for HWT's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

<sup>34</sup> See Appendix A for HWT's Safety Culture Objectives, Lessons Learned, and Progress on Previous Year's Recommendations.

new 12-month and 3-year safety culture objectives that are aligned and connected in their overall goals.

## 6. Conclusion

This report provides the findings and recommendations from Energy Safety's 2024 SCA Report for HWT, its fourth under Public Utilities Code section 8389(d)(4). Following the publication of this report, HWT 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 HWT. Energy Safety evaluates an electrical corporation's safety culture to identify best practices and relative gaps. This process includes understanding HWT'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 incorporates continuous learning into the SCA process.

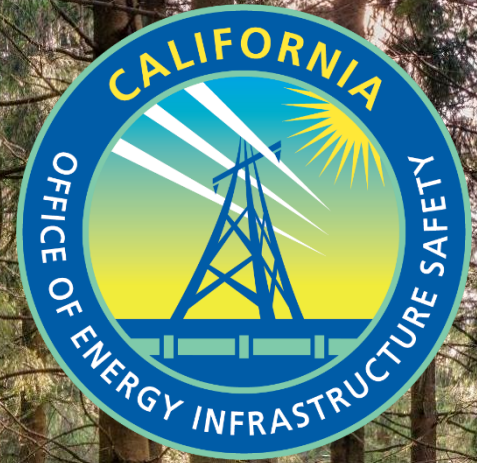
# DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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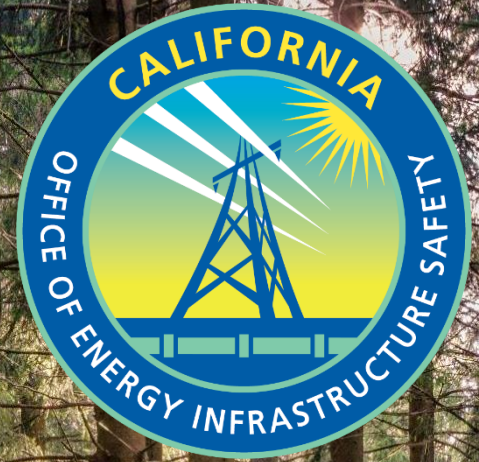






# APPENDICES





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





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

**January 2025**

## **Horizon West Transmission, LLC**



OFFICE OF ENERGY  
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SAFETY



**HWT**  
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

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

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Number of preventable accidents

Employee Review of Smith Driving Video(s)

## C2. 12-Month Target

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0

100%

## D2. Description of Objective

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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

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100% Contractor Safety Training

## B3. Progress Metrics

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Number of contractors receiving site safety training

## C3. 12-Month Target

---

100% trained

## D3. Description of Objective

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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

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Safety Training Refresher

## B4. Progress Metrics

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CPR Training

## C4. 12-Month Target

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100% Staff CPR certified

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

## D4. Description of Objective

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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.

## A5. Objective

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Ensure Safe Behavior at Job Site

## B5. Progress Metrics

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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.

## C5. 12-Month Target

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0 Safety Incidents

100% Reporting of near misses

Record any potential/observed safety hazard and record amelioration or mitigation thereof

## D5. Description of Objective

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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.

\*HWT's total employee count consists of two field engineers who alternate conducting site inspections and related maintenance works on a monthly basis and additional site visits on an as needed/required basis.

## A6. Objective

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Safety Share Moment



## **D6. 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

## **A7. Objective**

Continued Participation in Monthly Safety Shares Across Transmission Division

## **B7. Progress Metrics**

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

## **C7. 12-Month Target**

Attendance and participation in monthly safety meetings with other affiliates across corporate enterprise

## **D7. Description of Objective**

Participation in monthly safety meetings hosted in a round-robin style by 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.

## **A8. Objective**

Annual Fire Drill

## **B8. Progress Metrics**

Complete annual fire drill

## **C8. 12-Month Target**

Annual fire drill completed

## **D8. 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.

## **A9. Objective**

Annual Fire Department Site Visit

## **B9. Progress Metrics**

Annual Fire Department Site Visit

## C9. 12-Month Target

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Site Visit Completed

## D9. Description of Objective

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

## 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

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#### A1. Objective

Creation of Periodic Fire Season Safety Stand Down

#### B1. Progress Metrics

Attendance to Fire Safety Stand Down

#### C1. 3-Year Target

Participate in 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

Participate in 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

Participate in Corporate Safety Survey

#### B3. Progress Metrics

Participation in safety survey

#### C3. 3-Year Target

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.

\*HWT's total employee count consists of two field engineers who alternate conducting site inspections and related maintenance works on a monthly basis and additional site visits on an as needed/required basis.

**A4. Objective**

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Employee Engagement Survey (Safety Dimension)

**B4. Progress Metrics**

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Responses to Employee Engagement - Safety Dimension

**C4. 3-Year Target**

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Participation in Employee engagement survey

**D4. Description of Objective**

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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".

\*HWT's total employee count consists of two field engineers who alternate conducting site inspections and related maintenance works on a monthly basis and additional site visits on an as needed/required basis.

## 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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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

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Business Unit Guiding Principles that are discussed at least monthly. Guiding Principles are also discussed at each safety post-event call. These Guiding Principles are reflected in corporate safety messaging as found in supporting documentation and the activities highlighted in the following section on cultivating a culture of continuous improvement. Transmission division had one safety incident reported by an affiliate. HWT team members participated in affiliate's presentation of the event and lesson learned to improve and refocus on hazard awareness and job task review techniques.

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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

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Encourage Safety Event Reporting

##### B1. Actions Taken

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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.

HWT team members have 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. No near misses were reported at HWT. As HWT has limited staff (2 persons), each field engineer is empowered to correct any potential/observed safety hazard. On a go-forward basis staff will actively record any potential/observed safety hazard and amelioration/mitigation thereof.

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#### A2. Recommendation 2

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Review and Refine Safety Culture Objectives.

##### B2. Actions Taken

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Revised Objectives (12 months) focus on sustainment of emplaced practices and refreshing of safety training. 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)maturing fire risk awareness/knowledge program, and (2)supporting enterprise level information gathering on corporate safety culture posture, employee safety perceptions and opportunities for improvement.

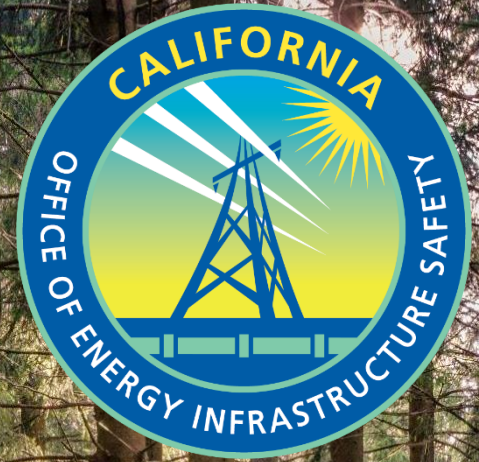
#### C2. Results

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HWT 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.

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# APPENDIX B: Supporting Documentation





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## Supporting Documentation

January 2025

# Horizon West Transmission, LLC



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**HWT**  
*2024 Safety Culture Assessment*

## Section 2. Supporting Documentation

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