State of California – A Natural Resources Agency

OFFICE OF ENERGY INFRASTRUCTURE SAFETY
715 P Street, 20th Floor | Sacramento, CA 95814
916.902.6000 | *www.energysafety.ca.gov*

Gavin Newsom, Governor

Caroline Thomas Jacobs, Director

September 2, 2021

Kellen C. Gill
California Regulatory Affairs Manager
San Diego Gas & Electric
SDG&E CP32F
8330 Century Park Ct.
San Diego, CA 92123-1530
KGill@sdge.com

Subject: **Office of Energy Infrastructure Safety Issuance of San Diego Gas & Electric Company's 2021 Safety Culture Assessment per Public Utilities Code Sections 8389(d)(4)**

Dear Mr. Gill:

Enclosed is the 2021 Safety Culture Assessment (SCA) report for San Diego Gas & Electric Company (SDG&E) conducted by DEKRA on behalf of the Office of Energy Infrastructure Safety (Energy Safety) in fulfillment of Public Utilities Code Section 8389(d)(4). This is the first annual SCA under this statute and as such provides a baseline for future comparison. Energy Safety will use the SCA reports to assess safety culture outcomes over time and incorporate continuous learning into the SCA process.

The enclosed report includes as an attachment (at Section 8.1) SDG&E's full written response to the draft report provided to SDG&E on August 25, 2021, for factual review and correction. SDG&E provided its written response on August 31, 2021. SDG&E made no clarifications of fact in its response.

SDG&E can satisfy the "good standing" requirement in Public Utilities Code Section 8389(e)(2) by agreeing to implement all of the findings (including recommendations for improvement) of its most recent SCA. This may be done by submitting a letter to this effect via E-Filing on the 2021 Safety Culture Assessments docket (Docket #2021-SCAs).[1]

---

[1] The 2021 Safety Culture Assessments docket can be accessed at
https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2021-SCAs.

Sincerely,

Lucy Morgans

Lucy Morgans
Acting Program Manager, Safety Policy Division
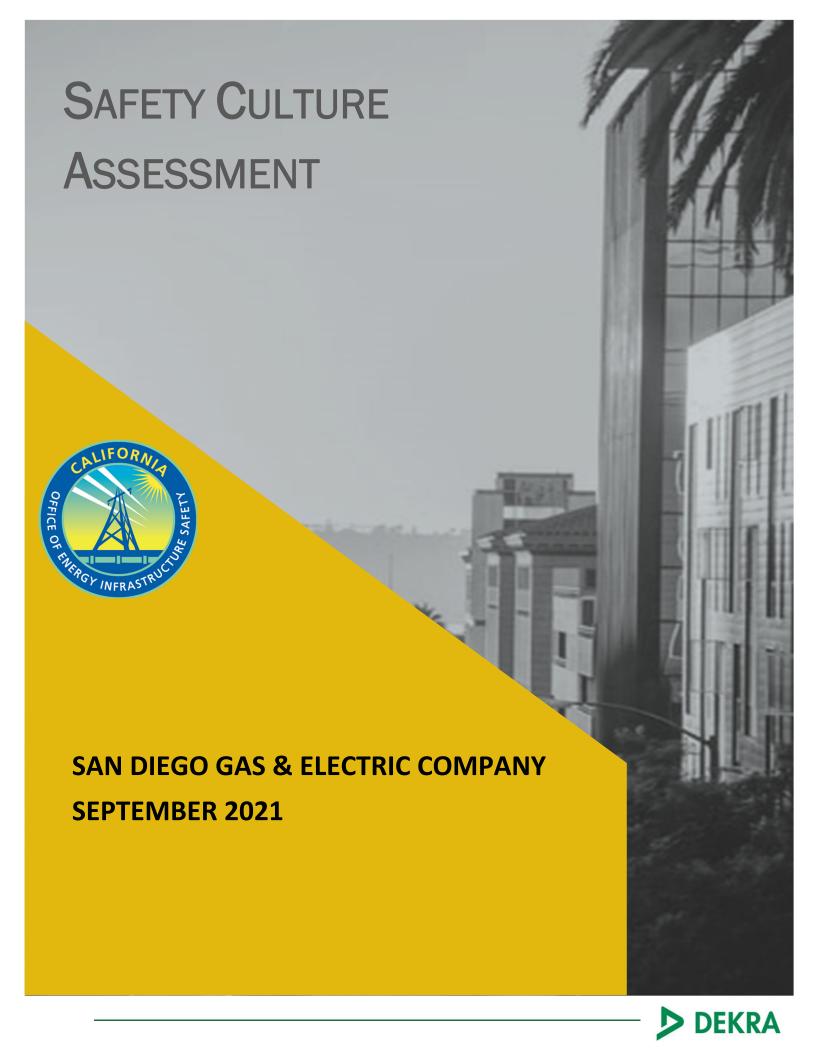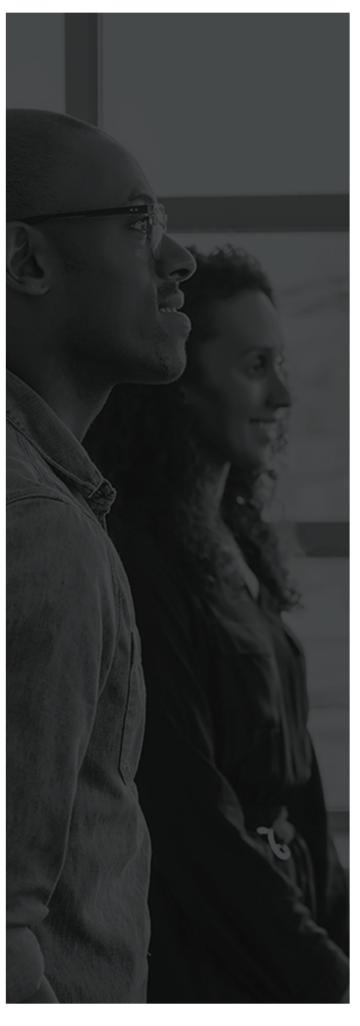Office of Energy Infrastructure Safety

cc:
Caroline Thomas Jacobs,
Director, Office of Energy Infrastructure Safety

Ryan Arba,
Program & Project Supervisor, Office of Energy Infrastructure Safety

Sara Moore,
Wildfire Safety Analyst, Office of Energy Infrastructure Safety

Service List for Docket #2021-SCAs

SAFETY CULTURE ASSESSMENT

SAN DIEGO GAS & ELECTRIC COMPANY

SEPTEMBER 2021

Table of Contents

1. Executive Summary

In 2019, California Assembly Bill 1054 added an annual safety culture assessment requirement to the Public Utilities Code. Public Utilities Code Section 8389(d)(4) requires the California Public Utilities Commission (Commission or CPUC), in consultation with the Wildfire Safety Division—as of July 1, 2021, now the Office of Energy Infrastructure Safety (Energy Safety), a new department under the California Natural Resources Agency—to develop a process for an annual Safety Culture Assessment for each electrical corporation. The annual Safety Culture Assessment process (approved by the Commission in 2020 in Resolution WSD-011) includes a workforce survey, a management self-assessment, submission of supporting documentation, and interviews. Energy Safety contracted with DEKRA Services, Inc., (DEKRA) to conduct the inaugural 2021 annual Safety Culture Assessment for each electrical corporation. The Safety Culture Assessments took place in May and June 2021. In the course of these assessments, the safety culture of San Diego Gas & Electric Company (SDG&E) was assessed with respect to both personal and wildfire safety.

The workforce survey and comments from the interview participants attest to the work SDG&E has done to advance its safety culture. The electrical corporation has a robust process for measuring and improving the safety culture, with ambitious near and long-term safety objectives supported by field-based projects and initiatives for frontline supervisors, employees, and contractors. Workforce comments indicate that communication of information and issues flows freely up, down, and across the organization.

This safety strategy can be further advanced by integrating wildfire hazard recognition and mitigation into current processes such as the corporation's new Behavior-Based Safety observation process (a peer-to-peer safety observation process) and by aligning and tracking specific leader actions in the field to reinforce the culture, improve wildfire hazard recognition, and demonstrate that the company cares about the workforce's opinions. These steps would marry SDG&E's efforts in personal safety with wildfire safety such that the overall organizational culture for safety is aligned. Therefore, to drive consistent improvement in its safety culture throughout the organization, SDG&E should act on the following recommendations:

1. Integrate safe behaviors associated with mitigating hazards from wildfires and hostile interactions with discontented members of the public into the Behavior-Based Safety observation program.
2. Clarify, coach, and track the behaviors field leadership needs to adopt to advance the safety culture.
3. Recognize and take action to mitigate the serious exposure posed by interactions with certain discontented members of the public.

Taking these actions will enable SDG&E to gain better intelligence as to what is occurring on the ground across the range of serious exposures employees face, increase management credibility in the eyes of field personnel, and continue to advance SDG&E's culture for wildfire and personal safety. A detailed narrative on the information collected through the workforce survey, management self-assessment, supporting documentation, and interviews, and the corresponding assessment and findings is provided below.

2. Overview

Assembly Bill 1054, signed by Governor Newsom in July 2019, states that "[b]y December 1, 2020, and annually thereafter, the [California Public Utilities Commission], after consultation with the [Wildfire Safety Division], shall adopt and approve […] [a] process for the division to conduct annual safety culture assessments for each electrical corporation" (Public Utilities Code Section 8389[d][4]).[1]

On November 30, 2021, the California Public utilities Commission (Commission or CPUC) issued its approval for a process for conducting annual safety culture assessments for each electrical corporation in Resolution WSD-011.[2] On January 22, 2021, the Wildfire Safety Division (WSD) at the CPUC published the Safety Culture Assessment (SCA) Requirements of Electrical Corporations (2021 Requirements).[3] The 2021 Requirements set out the key components of the SCA process: a workforce survey, a management self-assessment, submission of supporting documentation, and interviews. The 2021 Requirements also provide guidance as to which components apply to which electrical corporations.

The first SCA under Public Utilities Code Section 8389(d)(4) took place in May and June 2021 under the WSD's direction. On July 1, 2021, the WSD transitioned to the Office of Energy Infrastructure Safety (Energy Safety), a new department under the California Natural Resources Agency. The first SCA reports are being issued under the direction of Energy Safety.[4]

The present SCA process is intended to be complementary to, and not a replacement for, ongoing work to improve safety culture at each electrical corporation. Energy Safety

---

[1] The full text of Pub. Util. Section 8389 can be found here: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8389.&lawCode=PUC (accessed July 16, 2021).

[2] Resolution WSD-011 "Resolution implementing the requirements of Public Utilities Code Sections 8389(d)(1), (2) and (4), related to catastrophic wildfire caused by electrical corporations subject to the Commission's regulatory authority," dated November 19, 2020, and issued November 30, 2020: https://energysafety.ca.gov/wp-content/uploads/docs/misc/docket/352490594.pdf (accessed August 18, 2021). Also see the attachments to WSD-011, including Attachment 4 "Annual Safety Culture Assessment Process Proposal," dated November 2020: https://energysafety.ca.gov/wp-content/uploads/docs/wmp-2021/docs/352460864.pdf (accessed August 18, 2021).

[3] Safety Culture Assessment: Requirements of Electrical Corporations (published Jan. 22, 2021, accessed July 16, 2021): https://energysafety.ca.gov/wp-content/uploads/docs/safety-culture-assessments/wsd-safety-culture-assessment-requirements-final-20210122.pdf.

[4] Pursuant to Public Utilities Code Section 326(b), on July 1, 2021, the WSD transitioned from the CPUC into the Office of Energy Infrastructure Safety (Energy Safety) under the California Natural Resources Agency. Energy Safety "is the successor to" and "is vested with all of the duties, powers, and responsibilities of the Wildfire Safety Division" (Government Code Section 15475). WSD is used to describe the work of the WSD prior to July 1, 2021. Energy Safety is used to describe the work of Energy Safety beginning on July 1, 2021. Any references to WSD action post July 1, 2021, or to Energy Safety action prior to July 1, 2021, are inadvertent and should be interpreted as the actions of WSD or Energy Safety as appropriate.

seeks to develop a longitudinal view of safety culture across electrical corporations to identify best practices and relative gaps, along with an understanding of each electrical corporation's relative strengths and weaknesses. Ultimately, Energy Safety seeks to assess safety outcomes over time and incorporate continuous learning into the assessment process.[5]

Different components of the SCA target different parts of the electrical corporation's workforce. The workforce survey is intended to target electrical corporation employees (including frontline workers and supervisors) and contractors who are engaged in wildfire hazard mitigation activities, for example workers performing vegetation management or installing system hardening infrastructure.[6] The management self-assessment and supporting documentation components are intended to be completed by electrical corporation employees capable of: evaluating the corporation's presently employed practices and capabilities regarding safety, identifying a target level on the four-point scale for each question by the end of 2022 based on wildfire mitigation and safety initiatives planned in the coming year, and describing its plan to realize that target.[7] The interview component is intended to support the workforce survey and management self-assessment by asking additional questions of those who may have participated in those components for further context. The interviews are intended to help DEKRA interpret the results of the survey and self-assessment more accurately and better identify the priority areas that electrical corporations should focus on improving.[8]

2.1 Components of the SCA

As stated above, the key components of the SCA are a workforce survey, a management self-assessment, submission of supporting documentation, and interviews. Not every component applies to every electrical corporation. An overview of the SCA components, together with guidance on which electrical corporations must complete each SCA component, is below. Note that electrical corporations are categorized as follows for this purpose:

- **Large electrical corporations ("Large IOUs"[9])**: Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE).

- **Small and multi-jurisdictional electrical corporations ("SMJUs"[10])**: Liberty Utilities (CalPeco), PacifiCorp, Bear Valley Electric Service, Inc.

- **Independent transmission operators ("ITOs")**: Horizon West Transmission, Trans Bay Cable.

---

[5] Safety Culture Assessment: Requirements of Electrical Corporations (2021), p. 3.
[6] Safety Culture Assessment: Requirements of Electrical Corporations (2021), p. 8.
[7] Safety Culture Assessment: Requirements of Electrical Corporations (2021), p. 14.
[8] Safety Culture Assessment: Requirements of Electrical Corporations (2021), p. 35.
[9] IOU: investor-owned utility.
[10] SMJUs: small and multi-jurisdictional utilities.

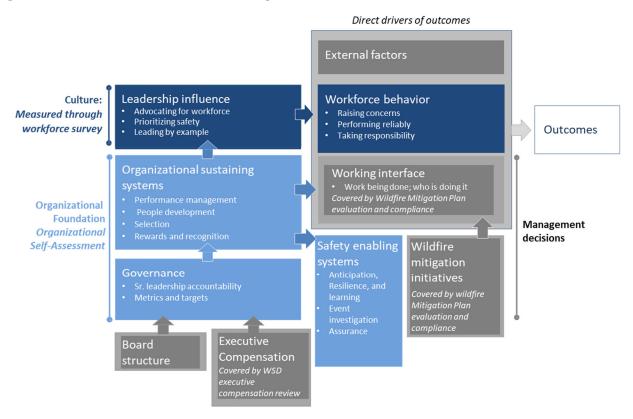| SCA requirements	Electrical corporations that must complete this requirement
Workforce survey	Large IOUs, SMJUs
Management self-assessment and plan summary	Large IOUs
Supporting documentation Section 1: Safety culture objectives	Large IOUs, SMJUs, ITOs
Supporting documentation Section 2: Summary of lessons learned	Large IOUs, SMJUs, ITOs
Supporting documentation Section 3: Summary plan for the following year	Large IOUs
Supporting documentation Section 4: Documentation to support responses to the management self-assessment	Large IOUs
Interviews	To be determined by Energy Safety upon review of submissions
Observational visits	To be determined by Energy Safety upon review of submissions

2.2 Framework for the SCA

The abovementioned components of the SCA (a workforce survey, a management self-assessment, submission of supporting documentation, and interviews) all inform the SCA findings. The SCA components are designed to be administered annually such that progress on the SCA can be measured over time. This is the inaugural assessment and will provide the baseline for evaluating progress in future years. Figure 1 below shows the elements of the organization's culture and foundation assessed by different components of the SCA.

The workforce survey component was designed to evaluate leadership's influence on the culture and the impact that it has on worker behavior. This was supplemented with follow-up interviews of frontline employees and supervisors. The management self-assessment component was designed to evaluate the organizational sustaining and safety enabling systems that undergird and reinforce every safety culture. In addition, the self-assessment measured the electrical corporation's approach to governance of its safety culture. The self-assessment was also supplemented by a focus group comprised of electrical corporation staff members who participated in the organization's self-assessment responses.

Figure 1. Framework for the Safety Culture Assessment

Source: Resolution WSD-011 Attachment 4 "Annual Safety Culture Assessment Process Proposal" (2020), p. 9.

2.3 Survey and Interview Data Collected

The first stage of the SCA process is a workforce survey. The workforce survey is comprised of 30 statements rated on a five-point Likert scale[11] from Strongly Disagree to Strongly Agree. The 30 statements were originally sourced from DEKRA's validated safety culture instrument, called the Organizational Culture Diagnostic Instrument (OCDI).[12] The OCDI statements were then cut and modified to (a) reduce the size of the survey and (b) ensure the SCA survey questions covered aspects of wildfire hazard mitigation pertinent to the SCA. The survey statements are all framed in a positive light (e.g., "managers treat workers with respect"), so agreement with any statement can be considered an indication of better performance by the corporation. The statements were constructed in this way to avoid respondent misinterpretation or coding errors and to improve the interpretation of the survey results.[13]

The 30 workforce survey questions fell into one of three categories: wildfire, safety, and culture. Nine questions specifically asked about the electrical corporation's safety culture with regard to wildfire (e.g., "our management acts quickly to address wildfire hazards"), eleven questions specifically asked about personal safety (e.g., "pausing work for hazards and safety concerns is viewed positively"), and ten questions asked about workplace culture in general (e.g., "the company cares about my opinions").

DEKRA instructed the electrical corporation to share the survey with all classifications of employees directly involved in wildfire mitigation. Based on that instruction, the electrical corporation selected the classifications of employees that would receive the survey.

DEKRA (via SDG&E) administered the workforce survey using a combination of paper and electronic surveys. The goal was for all levels of SDG&E employees and contractors to have ample opportunity to complete the survey. SDG&E distributed the survey electronically on May 12, 2021. Participants had 11 working days to respond (the survey closed on May 26, 2021). A total of 1,174 employees responded to the survey out of 1,474 employees working on wildfire mitigation, resulting in a response rate of 80 percent. In addition, survey responses were received from 291 SDG&E contractor employees out of an undetermined contractor employee population base. Because of the large number of contractors, DEKRA provided guidance to SDG&E to allow contractors to sample from their employee populations who predominantly work in SDG&E territory on wildfire mitigation activities. The final number of contractor

---

[11] A Likert scale is a rating system commonly used in questionnaires and survey research to measure people's attitudes, perceptions, and opinions. For more information, see: https://www.questionpro.com/blog/what-is-likert-scale/ (accessed July 28, 2021).

[12] For more information about the OCDI see: https://www.dekra.us/en/organizational-safety-reliability/ocdi/ (accessed July 28, 2021).

[13] See the following research article evaluating the effects of using positively and negatively worded survey statements: Sauro and Lewis (May 2011), "When Designing Usability Questionnaires, Does It Hurt to Be Positive?" Proceedings of the SIGCHI Conference on Human Factors in Computing Systems, https://measuringu.com/wp-content/uploads/2017/07/sauro_lewisCHI2011.pdf (accessed August 23, 2021).

employees receiving the survey could not be determined because the recipients were determined by the contractors and the contractors did not provide DEKRA with the total number of their employees receiving the survey. The workforce survey planning meeting for this assessment focused primarily on electrical corporation demographics, administration details, and the survey launch timeline. Planning meetings for subsequent assessments will need to address contractor outreach more formally. In the future, SDG&E should be more direct with requiring contractors to report the number of their employees invited to participate in the survey so that a response rate can be calculated.

Following administration of the workforce survey, three groups of SDG&E employees involved in wildfire mitigation were interviewed on June 16, 2021. Due to time constraints and COVID-19 considerations, these interviews were conducted virtually over the phone using a teleconference line and a virtual meeting platform. The purpose of these group interviews was to better understand how frontline workers and supervisors view the organization's culture. The findings from these interviews provided context for the data from the survey. DEKRA asked SDG&E to invite relevant workers to participate in the calls. DEKRA instructed SDG&E to identify workers from departments that play a direct role in wildfire mitigation to participate in the group interviews, and the workers identified by SDG&E were invited to participate in the interviews. A total of 14 SDG&E employees participated in the three workforce survey follow-up calls. A relatively experienced group of employees participated: only two of the 14 had fewer than 14 years of experience working for SDG&E (with 3 and 9 years of experience). The median tenure of participants was 16.5 years, with a range of 3 to 20 years. Two of the groups consisted of frontline employees whose work entails some form of wildfire mitigation. These interviews were 90 minutes in length, conducted virtually via conference call and facilitated by a DEKRA consultant. A total of eight frontline workers participated in the two calls (two on one, six on the other). The third group was an hour-long virtual meeting with six SDG&E frontline supervisors[14] supervising work that entails some form of wildfire mitigation. This group of supervisors had tenures ranging from 15.5 to 20 years of experience at SDG&E. This was also facilitated by a DEKRA consultant. Interview questions followed a semi-structured format. They were open-ended and allowed for follow-up questions for clarity. For example, "What words would you use to describe the culture here?" and "How are personal safety and wildfire hazards addressed here?"

2.4 Management Self-Assessment Data Collected

Each large electrical corporation completed a management self-assessment consisting of 22 questions organized into three categories: organizational sustaining systems, governance, and safety-enabling systems. These categories represent the systems and

---

[14] Frontline supervisors: here, the first level of leadership that has direct oversight of employees within operational units of the organization.

management processes that are needed for a safety culture to advance and sustain itself.

Respondents answered each question using a four-point behaviorally anchored rating scale. The safety culture maturity scale used in the management self-assessment starts on the low end at Level 1, "Requirement" (i.e., minimum requirements are met), and goes up to Level 4, "Who We Are."

The electrical corporation selected the team of employees that would complete the management self-assessment. Each large electrical corporation submitted one self-assessment.

For each of the 22 questions, the management self-assessment respondents evaluated the current (2021) status of their organization and provided a justification for this rating using a free text form. In addition, respondents rated how much progress they expect the organization to make by the end of 2022 on the same questions and scales.

Each electrical corporation also submitted supporting documentation, providing the following:

1. Safety culture objectives for the next 12 months.
2. Safety culture objectives for the next three years.
3. A description of lessons learned since the most recent Safety Culture Assessment.[15]
4. A summary plan for how each corporation will achieve its 2022 self-assessment goals in the coming year.

Finally, DEKRA conducted an interview with the electrical corporation employees who had completed the management self-assessment to better understand their submission and supporting documentation. Like the workforce survey follow-up interviews, this interview was conducted virtually.

2.5 Next Steps in Assessment Process

This is the first annual Safety Culture Assessment under Public Utilities Code Section 8389(d)(4) and as such provides a baseline for future comparison. Following the publication of this report, SDG&E may agree to implement its findings to demonstrate "good standing" per Public Utilities Code Section 8389(e)(2).[16]

---

[15] As 2021 is the first year of the annual Safety Culture Assessment under Public Utilities Code Section 8389(d)(4), the electrical corporation was asked to evaluate lessons learned since its "most recent" safety culture assessment (if any), and specifically to: "[d]escribe how the electrical corporation's objectives and priorities with respect to safety culture have evolved over the past year. Outline any major themes and lessons learned over the past 12 months and subsequent actions taken. If you have not completed a safety culture assessment in over three years, consider your safety culture as it exists today and describe the major themes that exist today." (See Section 6.4 "Lessons Learned" below for more information.)
[16] Pub. Util. Section 8389(e)(2), "The electrical corporation is in good standing, which can be satisfied by the electrical corporation having agreed to implement the findings of its most recent safety culture

3. Findings

3.1 Strengths

3.1.1 SDG&E has implemented a robust process for measuring and improving its wildfire and personal safety culture.

Every two years SDG&E undertakes a safety culture assessment and uses it as the basis for a detailed plan for improvement. SDG&E's Safety Management System (SMS)[17] was established in 2020, and its Serious Injury & Fatality (SIF) Initiative was introduced in 2021. It also recently implemented the Behavioral Accident Prevention Process (BAPP®), which is a peer-to-peer safety observation process more commonly referred to as a Behavior-Based Safety (BBS) Process.[18,19] All BBS observations now go into a single system, where previously they were siloed. Also, as of 2021, SDG&E has a contractor safety scorecard, ranking contractors accordingly.[20] As a result of these efforts, tracked safety metrics incorporate proactive, leading indicators[21] focusing on improving the reporting mechanisms for near misses[22] and safety observations for contractors in addition to only using backward-looking lagging metrics[23]. SDG&E's process for safety culture improvement has also resulted in a holistic safety strategy, including behavioral objectives for improvement. Below are examples of safety objectives that SDG&E tracks and monitors:

- Leadership involvement in safety through management participation in BBS meetings.
- Employee engagement in incident[24] investigations and near-miss reporting.
- Proactive peer-to-peer observations of both SDG&E employees and contractors to promote safe behaviors and a feedback-rich environment.

---

assessment, if applicable" (accessed July 16, 2021): https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8389.&lawCode=PUC).

[17] A safety management system is a method for providing management control of safety risks in the operations. This is typically accomplished through commercially available software systems designed to help companies record hazards and incidents, document corrective actions, and display and communicate results.

[18] Behavior-Based Safety (BBS): a broad term used to describe programs for improving workplace safety by observing and analyzing employees' behavior while they work.

[19] Full disclosure: A separate team employed by DEKRA has been supporting SDG&E on its BBS/BAPP program (2018 to present) and its Serious Injury and Fatality (SIF) initiative (2019 to present). This team was not involved in the present SCA process. DEKRA instituted strict communication and document barriers between the team working with SDG&E and the one working on this SCA.

[20] This is done using ISNetworld, which pre-qualifies SDG&E contractors.

[21] Leading Indicator: here, an input measure that is predictive of a future event.

[22] Near Miss: here, an unplanned event that did not result in injury, illness, or damage, but had the potential to do so.

[23] Lagging Indicator: here, an outcome or output measure that is backward-looking, describing a past event.

[24] Incident: here, an unplanned, undesired event that adversely affects normal operations.

- A three-year objective to track more advanced leading indicators related to stopping the job and completing SIF investigations.

SDG&E's management self-assessment evaluation of its current 2021 status reflects these efforts. SDG&E rated its 2021 status at the top end of the four-point rating scale – Level 3 ("Value") or Level 4 ("Who We Are") – on 21 of the 22 self-assessment questions. Furthermore, SDG&E expects to be at Level 4 on 16 of the 22 questions by the end of 2022 with the remaining questions at Level 3 (see Section 6.2.1).

This strategy has positively impacted frontline worker perceptions of the safety culture. For example, interview participants described the personal and wildfire safety culture as "strong," "robust," and "a very targeted process." These statements support the workforce survey results. Specifically, 91 percent of survey respondents "strongly" or "somewhat" agreed with the statement "protecting the community from wildfire hazards is a high priority with management," 87 percent "strongly" or "somewhat" agreed with the statement "my supervisor would use whatever power he/she has to help me out," and 88 percent "strongly" or "somewhat" agreed to the statement "people in my work group treat each other with respect." These positive views are reflected in the overall category scores from the workforce survey. All three categories—safety, culture, and wildfire—were rated by survey respondents at an average of 4.13 or above on a five-point Likert scale.

Furthermore, the perceptions of SDG&E employees are generally in alignment with the perceptions of contractor employees on nearly all 30 workforce survey statements. Of the 1,465 SDG&E responses, 291 were from contractor employees, and they share the positive perception of SDG&E employees on the safety culture (see Section 6.1.2).

This positive safety culture has created an environment in which workers feel free to pause the job if they have concerns. On the workforce survey, 89 percent of respondents strongly or somewhat agreed that pausing work for hazards and safety concerns is viewed positively. The workforce interviews reiterated how much this is emphasized. One interview participant stated of the need to pause and adjust if the job changes: "That is hammered in on us. Any time there's a change, we need to re-tailgate[25] and reevaluate the situation. There's a step-by-step checklist." For example, one interview participant reported that when he joined a crew to provide assistance, "the foreman brought the guys down from the bucket" […] "and re-tailgated with him to let him know his responsibilities when assisting the crew."

Several workforce interview participants said that the corporation's emphasis on safety is so strong that workers sometimes perceive it as a problem. One said:

> It's almost burdensome. But it's a good thing. Slows you down, gets you think about something. When new people come on to a job site you have a new tailgate to explain dangers and figure out where the new person is supposed to be. We can do better but we are striving constantly to do better.

---

[25] Tailgate: a crew meeting at a worksite where a safety briefing usually takes place.

SDG&E stated in its self-assessment that it is seeing an increased number of near-miss events reported by employees, and also that, although usually anonymous, "recently more employees are including their name to assist with proper follow up." This is facilitated by a new near-miss software application (or app) that was rolled out in 2019 for use on all employee phones, including a web-based option. The app produces a daily report of near-miss events. Some participants indicated the reporting might be bordering on overly thorough, including one who said: "There are some good ones. [And] others that perhaps weren't necessary to share." In 2021, near-miss reporting is being included for the first time in the employee incentive program.

Additionally, as noted above, SDG&E launched a Serious Injury and Fatality (SIF) Initiative in 2021. It has developed a SIF checklist that was seen as helpful by interview participants. One interview participant said, "Just saying the checklist out loud helps." The SIF Initiative will be tracking and reporting on relevant metrics as it gets up and running.

3.1.2 Communication of information, issues, and concerns flows freely up, down, and across the organization.

Participants in all interview sessions noted that personal and wildfire safety messaging from the top of the organization communicated to the field was viewed positively. Participants felt that the focus on safety at the top was passionate, demonstrated alignment with the field, and showed that frontline supervisors are open to listening and learning.

Interview participants also observed there is good flow of information on personal and wildfire safety up and down the organization, including a monthly report by Safety Services. Safety Services engages in "copious benchmarking and reporting on trends," one participant reported. They perceive wildfire safety as a year-round process discussed in daily tailgates, and they view Safety Services' messages as credible, informative, and actionable. These perceptions are aligned with survey results showing that 86 percent of employees strongly or somewhat agreed with the statement "wildfire and personal safety concerns are communicated openly."

Workforce interview participants specifically mentioned the importance of SDG&E's corporate leadership in changing safety practices for the better. SDG&E's new Chief Safety Officer Kevin Geraghty (appointed to that role in January 2021) was mentioned. One participant said: "Things changed when [Kevin Geraghty] came on board." And: "We get emails from Kevin Geraghty and his team. Safety matters to him. He brings up awareness. If a stand-down is needed, we have a stand-down."

As noted above, some workforce interview participants expressed concern there might be more than enough emphasis on safety. For example, one participant stated:

> [It's] not necessarily overkill, but a little overkill is OK. To some extent it is welcomed. You can't get jaded. We are so hypervigilant – we get daily meteorology reports, it's the first thing we see in our email when we log in at 6 AM. The Fire Potential Index. We are flooded with the message of vigilance.

Another comment about the company's strong emphasis on safety culture expressed skepticism: "Yesterday jobs were shut down because it will be too hot today and it caused a lot of panic," "there was a lot of overreaction." Another participant described the company culture as "situational awareness to the *nth* degree." Occasional hypervigilance might be a negative side-effect of advancing the safety culture of an institution. At the same time, another interview participant recognized the positive change in his own approach to work regarding safety: "When [a job is supposed to be smooth and everything goes south], I used to be 'I'm an operator, I don't need any help,' [a] pride thing. We've definitely changed that. It takes a little bit longer to get feedback, but management says to take your time and make sure you have the right process."

3.1.3 SDG&E is integrating data intelligence and technology to better understand the work environment for safety.

Controlling exposure[26] before it results in an incident is critical to improving safety. However, achieving this requires a non-punitive reporting culture and data to glean insight from reported incidents and near misses.

SDG&E is using technology to proactively identify locations, activities, and people for safety interventions before incidents occur, aiming at eliminating exposures. For example:

- By establishing a Behavior-Based Safety (BBS) process and collecting near-miss data and vehicle telematics data, SDG&E can advance its understanding of the safety environment and intervene more directly to control exposure. For example, if a vehicle telematics system demonstrates that a driver is registering a large number of "hard-braking" events, the BBS process can intervene via peer-to-peer coaching to discuss and address safe behaviors before an incident occurs.

- By encouraging near-miss reporting, SDG&E is reducing the barriers to reporting, gathering additional intelligence about events in the field, and moving the culture to a place where reporting issues is viewed as non-punitive. Having a specific objective for the number of near misses reported is a cautious step forward in this regard but must be monitored closely to ensure unintended behaviors and consequences are avoided.

Possibly a result of these efforts is that 82 percent of survey respondents "strongly" or "somewhat" agreed with the statement "People look for wildfire hazards and risks as work progresses" and 74 percent "strongly" or "somewhat" agreed with the statement "People in my work group report all wildfire hazards, no matter how minor." Interview participants supported this view, with one saying: "You might be afraid of repercussions, but management has made it clear there will be no discipline for reporting near misses. Over the years, more people have become more outspoken."

---

[26] Exposure: here, a state of vulnerability to injury that exists when a person comes in contact with a hazard. Exposure reduction or exposure control results from separating the person from the hazard and protecting the person from the vulnerability raised by the hazard (for example, by wearing protective equipment).

3.2 Opportunities

3.2.1 Wildfire hazard recognition and corresponding safe behaviors are not integrated into SDG&E's BBS program.

SDG&E has a robust BBS program in place. BBS programs have the capacity to drive employee engagement, increase safe behaviors, and reduce injuries. Yet the BBS observer's checklist has not been broadened to include safe behaviors related to wildfire hazards. In a possibly related finding, only 47 percent of workforce survey respondents "strongly" or "somewhat" agreed with the statement, "I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them." Looking at the workforce survey, this perception seems evident across departments, locations, years of service, and field personnel. Supervisors and individual contributors[27] rate this statement significantly more negatively on the survey than executives and managers (see Section 6.1.2). Interview participants, however, consistently expressed the view that frontline supervisors do solicit and address their safety concerns. The corporation's practices with regard to soliciting feedback regarding wildfire hazards in particular may be uneven.

Furthermore, frontline workers who were interviewed indicated their second most-cited exposure (driving ranked first, tied with the hazardous nature of the work) was interactions with certain discontented members of the public.[28] One participant reported:

> *I've been in this industry 37 years. If someone gets in your face, pulls a weapon on you– that happened to me in the field – you just take it. You aren't protected the way you are in an office job. We could do better to protect field personnel. Someone assaulted me and I had to go to anger management.*

SDG&E has a Company Operations Standard related to threats of violence from the public that supervisors are required to review with employees annually. However, it's not clear that this precaution is integrated into the BBS observation inventory. Doing so would help maintain a focus on this kind of exposure and keep the corresponding safe behaviors regarding de-escalation and disengagement front and center for employees.

---

[27] Individual Contributor: here, an employee who is not in a management position or has any employees directly reporting to them.

[28] In response to the question "what are the top three hazards on the job," SDG&E interviewees mentioned approximately eight different hazards: most mentioned (5 times) elements related to the hazardous nature of the work (lifting/strain, slips, trips, falls, working aloft, falling object, "testing, isolation, construction," electricity ["energized conductor"], sharp objects ["There's blades everywhere"]); (5 times) driving (especially in rough terrain); (3 times) interactions with members of the public; (1 mention each) lack of situational awareness; COVID-19, wildfire ("If you're on a one-way road and a fire occurs, make sure you're pointed in the right direction"), animals on the site (snakes, dogs), poison oak.

3.2.2 SDG&E does not have a tracking mechanism for field leadership activities.

SDG&E is engaged in multiple projects and initiatives to develop safety-related supervisor and manager capabilities such as training, individual development plans (IDPs), and quarterly leadership summits. In addition, SDG&E tracks field safety visits and supervisor participation scores on its culture assessment. However, it's not clear how SDG&E ensures that skills taught in training or emphasized in the IDPs are applied and demonstrated on the job.

Under Section 2 of the supporting documentation, "Description of lessons learned since most recent safety culture assessment," SDG&E reported "increased field safety visits" as an action taken to further supervisor engagement. It would be valuable to know the number of these visits. Presence in the field, however, is only half the challenge. It's also important to understand what supervisors do while they're in the field and to help them use this time more effectively through coaching. In a related finding on the workforce survey, leadership engagement statements such as, "I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them," "The company cares about my opinions," and "I believe managers apply the same rules for all workers" drew favorable (strongly or somewhat agree) ratings from only 47 percent, 68 percent, and 69 percent of respondents respectively, among the lowest-rated statements on the workforce survey (see Section 6.1.1). The first of these three ("I am regularly asked for my ideas…") is the workforce survey statement with the most negative responses from all levels of employees below the executive level.

4. Recommendations

4.1 Integrate safe behaviors associated with mitigating wildfire risk and personal risk from interactions with the public into the BBS observation program.

The BBS observation program provides an avenue for communicating and mitigating the most significant safety exposures in the work environment. This program can be broadened to incorporate, reinforce, and track the safe behaviors associated with mitigating wildfire hazards and minimizing risk in interactions with certain discontented members of the public.

- **Observation:** SDG&E has a robust BBS observation program designed to provide "no name, no blame" feedback to frontline workers on safe behaviors. However, this program does not include behaviors related to wildfire hazards or dealing with hostile members of the public.

- **Goal of Recommendation:** Leverage the BBS observation program to raise the profile of wildfire hazards and hazards from interactions with the public and provide SDG&E with additional intelligence on these exposures.

- **Verification Method:** In next year's assessment provide a description of the progress SDG&E has made in incorporating these behaviors into the BBS observation program and communicating this information to program leaders and observers. Progress should be evident in increased positivity in response to the statements "I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them" and "the company cares about my opinions" on the 2022 workforce survey.

Incorporating safe behaviors associated with reducing wildfire risk (for example, avoiding parking in the brush) into the observation lists used in the field for employees and contractors provides an opportunity to further advance wildfire hazard mitigation. Furthermore, although the risk posed by hostile interactions with members of the public is currently discussed at tailgate meetings, the subject deserves increased focus and visibility via the BBS observation and feedback process. Implementing this recommendation will provide SDG&E with the data needed to identify problem areas and design and implement a plan to anticipate, mitigate, and control this risk. Beyond the obvious need to keep employees safe, this action will demonstrate that the field voice is heard at management levels and will help continue to advance the safety culture at SDG&E.

4.2 Clarify, coach, and track the behaviors field leadership needs to adopt to advance the safety culture.

The IDP approach is an effective way to build leadership skills and capabilities. However, to advance a safety culture, it's critical that employees perceive all frontline supervisors as aligned and consistent in messaging, approach, and focus area. For example, identifying a few (two or three) specific actions that all frontline supervisors should consistently demonstrate will support positive organizational change. These specific actions can be integrated into IDPs. For example, one goal could be for all frontline supervisors to visit each direct report once a month in the field and discuss wildfire hazards and other safety exposures in their work environment. This could help address the low scores survey respondents gave to the statement "I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them." SDG&E already tracks field visits but can augment this by specifically identifying what frontline supervisors should emphasize while in the field. These activities can then be reinforced and sustained by leadership coaching and tracking to ensure quality execution.

- **Observation:** SDG&E has invested time and resources into leadership development. These investments can be augmented by aligning frontline supervisor activities with specific and consistent actions to support improvement in SDG&E's safety culture.

- **Goal of Recommendation:** Reinforce SDG&E efforts for leadership engagement and safety culture change.

- **Verification Method:** In next year's assessment, provide a description of what two or three specific safety activities SDG&E is focusing on among frontline supervisors to reinforce the safety culture. Also, describe how these activities are being tracked and how frontline supervisors are being coached on these activities. Progress should be evident in increased positivity in response to the statements "I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them" and "the company cares about my opinions" on the 2022 workforce survey.

Training alone is insufficient to drive safety culture advancement. Actively tracking field leadership activities helps to ensure that frontline supervisors are applying skills in the field to support safety culture advancement, especially if tracking is reinforced by manager-level field coaching. Training must be supported by manager-level coaching and tracking so that improvement occurs and is sustained across the organization.

4.3 Recognize and take action to mitigate the risk exposure posed by interactions with certain discontented members of the public

Frontline workers report concerns for their personal safety from interactions with certain discontented members of the public. Interview participants indicated their belief that this hostility may be related to the use of Public Safety Power Shutoffs (PSPS) and vegetation management activities. It was reported as a safety concern by workers at all three large electrical corporations. In addition to incorporating the desired safe behaviors for handling interactions with discontented members of the public into the BBS observation checklist (see Section 4.1), SDG&E should track these instances and create training, protocols, and a strategy for managing this risk exposure.

- **Observation**: Participants in the workforce survey follow-up interviews noted instances of hostile interactions with discontented members of the public while the participants were trying to work. This is not only a problem for worker safety and morale but could meaningfully hamper wildfire mitigation activities.

- **Goal of Recommendation**: Reduce the safety risks to the workforce from the public. To this end, SDG&E should track the trends in hostile interactions with the public to guide future response strategies and develop (if not already developed) and train frontline workers on a protocol to de-escalate and disengage from unsafe interactions with the public.

- **Verification Method**: In next year's self-assessment, provide a description of how SDG&E has made progress toward this goal. If a protocol and training are already in place, provide all available information on outcomes from the training (e.g., reports of improvements in interactions with the public using tactics learned in the training).

Beyond the obvious benefit of potentially improving frontline worker safety, tracking trends in hostile interactions with the public and developing a protocol and related training around de-escalation and disengagement would demonstrate that field voices are welcome—and heard—at management levels.

5. Conclusion

This report provides the findings from SDG&E's first Safety Culture Assessment under Public Utilities Code Section 8389(d)(4). It gives Energy Safety a baseline measurement of SDG&E's current safety culture for future comparison. Following the publication of this report, SDG&E may agree to implement its findings to demonstrate "good standing" per Public Utilities Code Section 8389(e)(2).

This process is intended to be complementary to, and not a replacement for, ongoing work to improve safety culture at SDG&E. Energy Safety seeks to develop a longitudinal view of safety culture across electrical corporations to identify best practices and relative gaps, along with an understanding of SDG&E's relative strengths and weaknesses. As stated above, Energy Safety ultimately seeks to assess safety culture outcomes over time and incorporate continuous learning into the SCA process.[29]

---

[29] Safety Culture Assessment: Requirements of Electrical Corporations (2021), p. 3.

6. Data Attachments

6.1 Workforce Survey Results

The results for the Workforce Survey are displayed on the following pages. In the tables in 6.1.2 "Results by Demographic Questions" and 6.1.3 "Results by Tenure and Level in the Organization" below, the data in the "Null" column represent results from respondents who chose not to respond to the demographic question. For example, in 6.1.2, there were 32 respondents who did not indicate their Employee Type on the survey.

The colors assigned to average scale scores correspond to percentile scores based on the typical distribution of scores across DEKRA clients evaluating comparable statements using a survey instrument as follows:

90th percentile

75th percentile

50th percentile

Below 50th percentile

6.1.1 Overall Results

SENTIMENT ANALYSIS: SDG&E	Overall Category Mean	Strongly Agree (5)	Somewhat Agree (4)	Neutral (3)	Somewhat Disagree (2)	Strongly Disagree (1)
Culture	4.13	45%	33%	8%	8%	2%
Safety	4.26	49%	33%	7%	7%	3% 1%
Wildfire	4.26	52%	28%	8%	8%	2% 2%

Culture

	Mean	Strongly Agree	Somewhat Agree	Neutral	Somewhat Disagree	Strongly Disagree
People in my work group treat each other with respect	4.41	57%	31%	5%	5%	
My supervisor would use whatever power he/she has to help me out	4.40	59%	28%	4%	4%	3%
Leaders encourage people to ask questions	4.36	55%	31%	5%	2%	
Information about important events and lessons learned is shared within my work group	4.30	51%	34%	6%	2%	
Managers treat workers with respect	4.27	52%	31%	6%	4%	2%
My supervisor makes sure all employee concerns are heard before job decisions are made	4.13	44%	33%	8%	8%	5%
People listen to one another; it is rare that someone's views go unheard	4.01	36%	38%	10%	10%	5% 2%
The company cares about my opinions	3.81	30%	38%	11%	11%	7% 4%
I believe managers apply the same rules for all workers	3.88	39%	30%	9%	9%	8% 6%
People report mistakes they make, even if others do not notice them	3.76	25%	35%	15%	15%	7% 2%

Safety

	Mean	Strongly Agree	Somewhat Agree	Neutral	Somewhat Disagree	Strongly Disagree
I take responsibility for the safety of myself and others in my work area	4.60	69%	24%	3% 0%		
Pausing work for hazards and safety concerns is viewed positively	4.47	63%	26%	4%	1%	
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.40	59%	27%	6%	2% 1%	
People have the skills they need to resolve workplace safety issues	4.25	44%	40%	7%	1%	
Leaders use mistakes and incidents as learning opportunities	4.31	51%	33%	6%	2%	
Leaders keep people prepared to intervene when an emergency occurs	4.29	49%	35%	6%	2%	
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.34	54%	29%	7%	7%	2% 1%
People have the ability to respond and correct problems and errors before they get out of control	4.15	39%	42%	8%	8%	3% 1%
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.20	44%	36%	9%	9%	2% 1%
We have the right tools for the job	4.18	45%	37%	6%	4%	2%
People focus on one task at a time and avoid distractions	3.71	24%	38%	13%	13%	9% 3%

Wildfire

	Mean	Strongly Agree	Somewhat Agree	Neutral	Somewhat Disagree	Strongly Disagree
Protecting the community from wildfire hazards is clearly a high priority with management	4.59	71%	20%	1% 1%		
My workgroup follows procedures to control workplace and wildfire hazards	4.47	60%	29%	5% 1% 1%		
Wildfire and personal safety concerns are communicated openly	4.38	54%	32%	6%	1%	
Our management acts quickly to address wildfire hazards	4.42	59%	27%	6%	1% 1%	
I feel comfortable discussing wildfire hazards with my supervisor	4.45	62%	25%	5%	2% 1%	
People look for wildfire hazards and risks as work progresses	4.25	46%	36%	8%	8%	1% 1%
Leaders actively seek out signs of potential wildfire hazards	4.22	48%	31%	8%	8%	3%
People in my work group report all wildfire hazards, no matter how minor	4.13	44%	30%	12%	12%	
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.45	21%	26%	18%	18%	10% 7%

6.1.2 Results by Demographic Statements

SURVEY RESULTS by DEMOGRAPHIC: **SDG&E**

LEGEND

■ High 4.1+ | ■ Med High 3.65-4.1 | ■ Medium 3.3-3.65 | ■ Low <3.3

	OVERALL	EMPLOYEE TYPE			LEVEL				
		Full Time Employee	Contractor	Null	Exec	Manager	Supervisor	Individual Contributor	Null
	1,465	1,142	291	32	11	133	146	754	98
Culture Average	4.13	4.14	4.14	3.81	4.58	4.43	4.27	4.09	3.87
I believe managers apply the same rules for all workers	3.88	3.88	3.92	3.52	4.64	4.23	4.00	3.83	3.51
Information about important events and lessons learned is shared within my work group	4.30	4.29	4.39	4.03	4.64	4.67	4.42	4.24	3.96
Leaders encourage people to ask questions	4.36	4.36	4.38	4.26	4.55	4.56	4.45	4.32	4.26
Managers treat workers with respect	4.27	4.30	4.17	3.83	4.64	4.62	4.53	4.25	3.93
My supervisor makes sure all employee concerns are heard before job decisions are made	4.13	4.13	4.17	3.74	4.55	4.37	4.29	4.08	3.85
My supervisor would use whatever power he/she has to help me out	4.40	4.41	4.43	4.03	4.64	4.59	4.55	4.38	4.15
People in my work group treat each other with respect	4.41	4.44	4.34	3.97	4.82	4.76	4.56	4.39	4.12
People listen to one another; it is rare that someone's views go unheard	4.01	4.01	4.04	3.81	4.55	4.29	4.14	3.96	3.78
People report mistakes they make, even if others do not notice them	3.76	3.76	3.76	3.61	4.27	4.00	3.79	3.73	3.56
The company cares about my opinions	3.81	3.83	3.76	3.32	4.55	4.26	3.94	3.76	3.54
Safety Average	4.26	4.27	4.26	4.02	4.51	4.58	4.37	4.23	4.02
Accidents & incidents are investigated completely	4.34	4.36	4.30	3.91	4.45	4.77	4.53	4.29	4.03
I stop people to point out unsafe behavior when I see it	4.20	4.20	4.21	4.10	4.18	4.44	4.35	4.16	3.94
I take responsibility for the safety of myself and others in my work area	4.60	4.63	4.52	4.35	4.73	4.82	4.79	4.58	4.46
Leaders keep people prepared to intervene when an emergency occurs	4.29	4.28	4.33	4.10	4.55	4.64	4.41	4.22	4.02
Leaders use mistakes and incidents as learning opportunities	4.31	4.31	4.31	4.10	4.64	4.67	4.40	4.26	4.09
Pausing work for hazards and safety concerns is viewed positively	4.47	4.51	4.35	4.10	4.73	4.80	4.62	4.49	4.15
People focus on one task at a time and avoid distractions	3.71	3.66	3.92	3.74	4.27	3.83	3.44	3.64	3.80
People have the ability to respond and correct problems and errors before they get out of control	4.15	4.14	4.21	3.97	4.36	4.50	4.18	4.10	3.87
People have the skills they need to resolve workplace safety issues	4.25	4.25	4.25	4.00	4.55	4.51	4.41	4.21	3.98
Stopping a job because a safety step is missing, is viewed positively by my supervisor	4.40	4.43	4.33	3.90	4.64	4.77	4.60	4.39	4.04
We have the right tools for the job	4.18	4.20	4.15	3.94	4.55	4.59	4.30	4.15	3.84
Wildfire Average	4.26	4.26	4.29	4.06	4.64	4.63	4.45	4.19	3.94
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.45	3.38	3.76	3.35	4.18	3.86	3.60	3.24	3.36
I feel comfortable discussing wildfire hazards with my supervisor	4.45	4.45	4.47	4.19	4.82	4.80	4.67	4.40	4.00
Leaders actively seek out signs of potential wildfire hazards	4.22	4.20	4.28	4.16	4.64	4.63	4.41	4.13	3.86
My workgroup follows procedures to control workplace and wildfire hazards	4.47	4.49	4.41	4.16	5.00	4.79	4.71	4.43	4.15
Our management acts quickly to address wildfire hazards	4.42	4.44	4.39	4.23	4.64	4.79	4.62	4.37	4.16
People in my work group report all wildfire hazards, no matter how minor	4.13	4.13	4.17	3.81	4.45	4.53	4.33	4.07	3.76
People look for wildfire hazards and risks as work progresses	4.25	4.25	4.25	4.16	4.64	4.70	4.39	4.19	3.81
Protecting the community from wildfire hazards is clearly a high priority with management	4.59	4.62	4.51	4.39	4.82	4.84	4.74	4.59	4.37
Wildfire and personal safety concerns are communicated openly	4.38	4.39	4.39	4.06	4.64	4.74	4.58	4.33	4.01

DEKRA

WILDFIRE HAZARD ACTIVITIES: **SDG&E**

LEGEND

■ High 4.1+ | ■ Med High 3.65-4.1 | ■ Medium 3.3-3.65 | ■ Low <3.3

	Asset inspection, maintenance and repair (..	Community engagement	Grid operations	Monitoring weather for wildfire risk	PSPS initiation and re-energization	Vegetation assessment and mitigation	Wildfire and PSPS risk assessment	Wildfire data collection and tracking	Wildfire emergency planning and preparation	Other
	352	145	92	110	217	326	184	99	207	419
Culture Average	4.05	4.35	4.19	4.33	4.33	4.11	4.40	4.43	4.43	4.27
I believe managers apply the same rules for all workers	3.79	4.08	3.92	4.16	4.14	3.90	4.19	4.24	4.21	4.01
Information about important events and lessons learned is shared within my work group	4.20	4.56	4.38	4.49	4.53	4.33	4.58	4.58	4.66	4.45
Leaders encourage people to ask questions	4.23	4.48	4.39	4.50	4.45	4.37	4.56	4.59	4.61	4.45
Managers treat workers with respect	4.17	4.52	4.30	4.52	4.53	4.16	4.60	4.64	4.63	4.46
My supervisor makes sure all employee concerns are heard before job decisions are made	4.02	4.33	4.14	4.25	4.31	4.15	4.42	4.39	4.38	4.26
My supervisor would use whatever power he/she has to help me out	4.34	4.55	4.39	4.55	4.56	4.39	4.62	4.61	4.65	4.53
People in my work group treat each other with respect	4.34	4.62	4.54	4.51	4.59	4.34	4.67	4.63	4.65	4.58
People listen to one another; it is rare that someone's views go unheard	3.97	4.23	4.10	4.24	4.18	4.02	4.26	4.21	4.29	4.09
People report mistakes they make, even if others do not notice them	3.66	3.99	3.86	4.02	3.93	3.79	3.93	4.14	4.04	3.83
The company cares about my opinions	3.73	4.10	3.84	4.07	4.06	3.69	4.17	4.26	4.14	3.99
Safety Average	4.21	4.52	4.36	4.49	4.45	4.26	4.50	4.51	4.55	4.39
Accidents & incidents are investigated completely	4.28	4.66	4.49	4.58	4.53	4.29	4.61	4.66	4.69	4.55
I stop people to point out unsafe behavior when I see it	4.25	4.44	4.41	4.55	4.41	4.23	4.43	4.38	4.47	4.29
I take responsibility for the safety of myself and others in my work area	4.57	4.84	4.76	4.81	4.79	4.54	4.83	4.77	4.83	4.75
Leaders keep people prepared to intervene when an emergency occurs	4.18	4.54	4.24	4.47	4.50	4.32	4.60	4.70	4.62	4.45
Leaders use mistakes and incidents as learning opportunities	4.18	4.59	4.41	4.54	4.49	4.36	4.55	4.57	4.60	4.48
Pausing work for hazards and safety concerns is viewed positively	4.41	4.79	4.64	4.67	4.68	4.34	4.71	4.71	4.79	4.68
People focus on one task at a time and avoid distractions	3.72	3.76	3.65	3.77	3.65	3.89	3.74	3.71	3.75	3.59
People have the ability to respond and correct problems and errors before they get out of control	4.10	4.34	4.23	4.38	4.34	4.19	4.35	4.40	4.43	4.21
People have the skills they need to resolve workplace safety issues	4.19	4.54	4.29	4.47	4.47	4.26	4.47	4.53	4.53	4.37
Stopping a job because a safety step is missing, is viewed positively by my supervisor	4.32	4.75	4.58	4.69	4.71	4.31	4.78	4.74	4.80	4.63
We have the right tools for the job	4.13	4.49	4.30	4.46	4.39	4.11	4.42	4.47	4.49	4.35
Wildfire Average	4.20	4.60	4.45	4.59	4.56	4.30	4.64	4.65	4.67	4.41
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.41	3.81	3.63	3.83	3.82	3.79	4.07	4.09	4.03	3.36
I feel comfortable discussing wildfire hazards with my supervisor	4.39	4.79	4.64	4.78	4.74	4.46	4.85	4.84	4.83	4.64
Leaders actively seek out signs of potential wildfire hazards	4.13	4.57	4.39	4.55	4.56	4.27	4.66	4.73	4.70	4.35
My workgroup follows procedures to control workplace and wildfire hazards	4.43	4.79	4.71	4.76	4.71	4.45	4.76	4.73	4.76	4.64
Our management acts quickly to address wildfire hazards	4.30	4.67	4.59	4.67	4.71	4.38	4.72	4.76	4.77	4.63
People in my work group report all wildfire hazards, no matter how minor	4.10	4.59	4.36	4.63	4.45	4.23	4.57	4.63	4.67	4.28
People look for wildfire hazards and risks as work progresses	4.26	4.63	4.33	4.62	4.57	4.27	4.60	4.56	4.67	4.43
Protecting the community from wildfire hazards is clearly a high priority with management	4.52	4.83	4.79	4.78	4.82	4.51	4.84	4.86	4.86	4.77
Wildfire and personal safety concerns are communicated openly	4.29	4.66	4.59	4.65	4.66	4.36	4.72	4.71	4.78	4.57

RESULTS by LOCATION: SDG&E

LEGEND

■ High 4.1+ | ■ Med High 3.65-4.1 | ■ Medium 3.3-3.65 | ■ Low <3.3

	Century Park / Park East	Kearny	Northeast	Mission Control / Skills	Eastern	North Coast	Beach Cities	Metro	Orange County	Ramona	Mountain Empire	Other	Null
	455	143	63	58	58	49	46	30	28	22	21	98	71
Culture Average	4.39	4.03	3.99	4.17	3.95	3.90	3.81	3.96	4.06	3.89	3.82	4.03	3.84
I believe managers apply the same rules for all workers	4.16	3.65	3.83	3.91	3.79	3.59	3.26	4.00	3.89	3.91	3.67	3.68	3.47
Information about important events and lessons learned is shared within my work group	4.58	4.15	4.17	4.40	4.00	4.06	4.00	4.13	4.14	3.82	3.57	4.17	3.96
Leaders encourage people to ask questions	4.56	4.21	4.22	4.43	4.16	4.22	4.04	4.23	4.32	3.86	4.00	4.28	4.32
Managers treat workers with respect	4.58	4.22	4.05	4.29	4.14	3.98	3.93	4.20	4.14	4.14	4.10	4.19	3.91
My supervisor makes sure all employee concerns are heard before job decisions are made	4.38	4.05	3.94	4.03	3.98	3.80	3.80	3.97	4.04	4.00	3.76	4.06	3.79
My supervisor would use whatever power he/she has to help me out	4.64	4.36	4.19	4.47	4.33	4.14	4.15	4.13	4.43	4.09	4.43	4.17	4.07
People in my work group treat each other with respect	4.73	4.28	4.22	4.33	4.14	4.33	4.26	4.13	4.29	4.23	4.05	4.42	4.04
People listen to one another; it is rare that someone's views go unheard	4.21	3.98	3.98	4.00	3.81	3.78	3.65	3.70	4.04	3.82	3.67	3.93	3.77
People report mistakes they make, even if others do not notice them	3.96	3.59	3.63	3.93	3.56	3.71	3.54	3.53	3.54	3.68	3.70	3.58	3.54
The company cares about my opinions	4.11	3.77	3.62	3.93	3.62	3.40	3.43	3.57	3.81	3.36	3.24	3.79	3.46
Safety Average	4.50	4.18	4.13	4.34	4.15	4.08	4.02	4.06	4.07	4.05	3.81	4.18	3.94
Accidents & incidents are investigated completely	4.64	4.22	4.16	4.40	4.19	4.24	3.93	4.21	4.04	4.05	3.71	4.39	3.89
I stop people to point out unsafe behavior when I see it	4.35	4.13	4.19	4.33	4.16	4.06	4.11	4.07	4.04	3.82	3.95	4.13	3.87
I take responsibility for the safety of myself and others in my work area	4.81	4.59	4.52	4.71	4.51	4.49	4.54	4.23	4.43	4.32	4.10	4.58	4.37
Leaders keep people prepared to intervene when an emergency occurs	4.58	4.14	4.06	4.28	4.17	3.94	3.96	4.07	4.07	3.91	3.95	4.16	3.94
Leaders use mistakes and incidents as learning opportunities	4.64	4.13	4.11	4.40	4.16	3.92	4.00	4.03	4.00	4.05	3.52	4.23	4.01
Pausing work for hazards and safety concerns is viewed positively	4.77	4.42	4.40	4.72	4.19	4.35	4.33	4.23	4.43	4.23	3.90	4.46	3.99
People focus on one task at a time and avoid distractions	3.66	3.76	3.65	3.40	3.65	3.71	3.60	3.57	3.57	3.82	3.76	3.59	3.73
People have the ability to respond and correct problems and errors before they get out of control	4.32	4.04	4.03	4.31	4.11	3.96	3.87	4.03	3.96	3.95	3.86	4.09	3.80
People have the skills they need to resolve workplace safety issues	4.50	4.13	4.19	4.24	4.18	4.06	3.87	4.13	3.96	4.09	3.81	4.11	3.96
Stopping a job because a safety step is missing, is viewed positively by my supervisor	4.75	4.33	4.37	4.66	4.16	4.02	4.11	4.10	4.29	4.18	3.57	4.32	3.92
We have the right tools for the job	4.47	4.15	3.78	4.29	4.16	4.08	3.89	4.03	4.00	4.18	3.76	3.90	3.83
Wildfire Average	4.52	4.04	4.13	4.47	4.15	3.98	3.98	3.95	3.96	4.02		3.83	4.21	3.97
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.58	3.07	3.10	3.62	3.19	2.98	3.11	3.07	3.32	3.27	3.33	3.43	3.44
I feel comfortable discussing wildfire hazards with my supervisor	4.69	4.29	4.38	4.64	4.38	4.22	4.11	4.07	4.14	4.24	4.00	4.42	4.11
Leaders actively seek out signs of potential wildfire hazards	4.51	3.90	4.08	4.55	4.07	3.84	3.87	3.93	3.93	3.86	3.86	4.07	3.93
My workgroup follows procedures to control workplace and wildfire hazards	4.74	4.35	4.31	4.62	4.37	4.24	4.28	4.17	4.32	4.23	3.95	4.44	4.16
Our management acts quickly to address wildfire hazards	4.74	4.25	4.22	4.64	4.28	4.16	4.04	4.10	4.04	4.09	4.00	4.35	4.13
People in my work group report all wildfire hazards, no matter how minor	4.38	3.80	4.05	4.43	4.11	3.92	3.93	3.80	3.86	3.95	3.76	4.15	3.73
People look for wildfire hazards and risks as work progresses	4.51	3.97	4.19	4.36	4.26	4.04	4.07	4.00	3.68	4.09	3.76	4.24	3.89
Protecting the community from wildfire hazards is clearly a high priority with management	4.86	4.49	4.46	4.74	4.55	4.39	4.37	4.37	4.21	4.32	4.00	4.55	4.42
Wildfire and personal safety concerns are communicated openly	4.69	4.21	4.37	4.64	4.14	4.04	4.04	4.03	4.14	4.14	3.76	4.26	3.94

DEKRA

RESULTS by BUSINESS UNIT: **SDG&E**

LEGEND
■ High 4.1+ | ■ Med High 3.65-4.1 | ■ Medium 3.3-3.65 | ■ Low <3.3

	Distribution	Transmission	Engineering	Emergency Management Services	Vegetation Management	Null
	523	168	153	92	39	167
Culture Average	4.02	4.14	4.44	4.45	4.32	4.03
I believe managers apply the same rules for all workers	3.78	3.75	4.24	4.24	4.24	3.70
Information about important events and lessons learned is shared within my work group	4.15	4.28	4.59	4.62	4.41	4.25
Leaders encourage people to ask questions	4.27	4.32	4.54	4.59	4.56	4.34
Managers treat workers with respect	4.20	4.26	4.64	4.62	4.49	4.14
My supervisor makes sure all employee concerns are heard before job decisions are made	3.99	4.17	4.44	4.37	4.26	4.06
My supervisor would use whatever power he/she has to help me out	4.33	4.42	4.65	4.64	4.46	4.27
People in my work group treat each other with respect	4.30	4.51	4.73	4.74	4.49	4.37
People listen to one another; it is rare that someone's views go unheard	3.88	4.10	4.27	4.28	4.21	3.89
People report mistakes they make, even if others do not notice them	3.65	3.74	4.05	4.11	3.90	3.63
The company cares about my opinions	3.65	3.81	4.24	4.33	4.15	3.68
Safety Average	4.17	4.32	4.50	4.56	4.40	4.14
Accidents & incidents are investigated completely	4.24	4.43	4.61	4.61	4.49	4.26
I stop people to point out unsafe behavior when I see it	4.16	4.28	4.38	4.39	4.28	3.96
I take responsibility for the safety of myself and others in my work area	4.53	4.70	4.81	4.80	4.64	4.59
Leaders keep people prepared to intervene when an emergency occurs	4.14	4.30	4.62	4.70	4.33	4.14
Leaders use mistakes and incidents as learning opportunities	4.19	4.29	4.56	4.70	4.56	4.22
Pausing work for hazards and safety concerns is viewed positively	4.42	4.59	4.74	4.77	4.62	4.37
People focus on one task at a time and avoid distractions	3.60	3.72	3.72	3.86	3.77	3.56
People have the ability to respond and correct problems and errors before they get out of control	4.06	4.19	4.33	4.40	4.21	4.02
People have the skills they need to resolve workplace safety issues	4.15	4.29	4.50	4.55	4.38	4.13
Stopping a job because a safety step is missing, is viewed positively by my supervisor	4.29	4.52	4.73	4.80	4.59	4.29
We have the right tools for the job	4.08	4.23	4.47	4.60	4.51	3.99
Wildfire Average	4.12	4.31	4.56	4.64	4.46	4.12
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.22	3.36	3.65	3.92	3.74	3.24
I feel comfortable discussing wildfire hazards with my supervisor	4.31	4.54	4.76	4.80	4.59	4.28
Leaders actively seek out signs of potential wildfire hazards	4.07	4.22	4.56	4.62	4.49	4.01
My workgroup follows procedures to control workplace and wildfire hazards	4.37	4.57	4.71	4.83	4.67	4.35
Our management acts quickly to address wildfire hazards	4.28	4.52	4.80	4.77	4.56	4.31
People in my work group report all wildfire hazards, no matter how minor	4.01	4.17	4.39	4.59	4.41	3.94
People look for wildfire hazards and risks as work progresses	4.14	4.27	4.56	4.60	4.38	4.08
Protecting the community from wildfire hazards is clearly a high priority with management	4.47	4.68	4.92	4.89	4.72	4.57
Wildfire and personal safety concerns are communicated openly	4.23	4.46	4.70	4.76	4.59	4.25

6.1.3 Results by Tenure and Level in the Organization

SURVEY RESULTS by TENURE: **SDG&E**

LEGEND	OVERALL	TENURE				
■ High 4.1+ | ■ Med High 3.65-4.1 | ■ Medium 3.3-3.65 | ■ Low <3.3		0-1 Years	2-5 Years	6-10 Years	10+ Years	Null
	1,465	151	219	113	570	89
Culture Average	4.13	4.43	4.29	4.15	4.05	3.85
I believe managers apply the same rules for all workers	3.88	4.37	4.11	3.81	3.72	3.57
Information about important events and lessons learned is shared within my work group	4.30	4.59	4.43	4.35	4.21	3.88
Leaders encourage people to ask questions	4.36	4.63	4.49	4.35	4.25	4.27
Managers treat workers with respect	4.27	4.58	4.46	4.40	4.21	3.92
My supervisor makes sure all employee concerns are heard before job decisions are made	4.13	4.38	4.26	4.04	4.07	3.81
My supervisor would use whatever power he/she has to help me out	4.40	4.66	4.49	4.43	4.36	4.07
People in my work group treat each other with respect	4.41	4.51	4.47	4.54	4.43	4.16
People listen to one another; it is rare that someone's views go unheard	4.01	4.33	4.15	4.04	3.91	3.75
People report mistakes they make, even if others do not notice them	3.76	3.95	3.98	3.81	3.64	3.57
The company cares about my opinions	3.81	4.27	4.02	3.78	3.71	3.47
Safety Average	4.26	4.44	4.36	4.33	4.23	3.94
Accidents & incidents are investigated completely	4.34	4.54	4.44	4.33	4.36	3.86
I stop people to point out unsafe behavior when I see it	4.20	4.19	4.21	4.31	4.22	3.92
I take responsibility for the safety of myself and others in my work area	4.60	4.65	4.63	4.73	4.64	4.36
Leaders keep people prepared to intervene when an emergency occurs	4.29	4.48	4.44	4.33	4.21	3.97
Leaders use mistakes and incidents as learning opportunities	4.31	4.60	4.47	4.41	4.21	4.01
Pausing work for hazards and safety concerns is viewed positively	4.47	4.73	4.58	4.58	4.49	4.08
People focus on one task at a time and avoid distractions	3.71	3.84	3.81	3.58	3.55	3.74
People have the ability to respond and correct problems and errors before they get out of control	4.15	4.34	4.28	4.19	4.09	3.78
People have the skills they need to resolve workplace safety issues	4.25	4.42	4.32	4.37	4.21	3.95
Stopping a job because a safety step is missing, is viewed positively by my supervisor	4.40	4.61	4.52	4.51	4.42	3.94
We have the right tools for the job	4.18	4.41	4.26	4.31	4.17	3.75
Wildfire Average	4.26	4.39	4.33	4.38	4.22	3.95
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.45	3.59	3.47	3.40	3.28	3.42
I feel comfortable discussing wildfire hazards with my supervisor	4.45	4.52	4.51	4.58	4.45	4.03
Leaders actively seek out signs of potential wildfire hazards	4.22	4.36	4.36	4.35	4.12	3.91
My workgroup follows procedures to control workplace and wildfire hazards	4.47	4.58	4.53	4.66	4.48	4.08
Our management acts quickly to address wildfire hazards	4.42	4.56	4.47	4.58	4.41	4.11
People in my work group report all wildfire hazards, no matter how minor	4.13	4.27	4.22	4.29	4.10	3.73
People look for wildfire hazards and risks as work progresses	4.25	4.34	4.36	4.41	4.21	3.88
Protecting the community from wildfire hazards is clearly a high priority with management	4.59	4.69	4.63	4.70	4.61	4.43
Wildfire and personal safety concerns are communicated openly	4.38	4.62	4.45	4.50	4.34	3.97

Organizational Level by Job & Tenure | SDG&E

LEGEND

■ High 4.1+ | ■ Med High 3.65-4.1 | ■ Medium 3.3-3.65 | ■ Low <3.3

	Exec	Manager			Supervisor				Individual Contributor					Null		
	10+ Years	2-5 Years	6-10 Years	10+ Years	0-1 Years	2-5 Years	6-10 Years	10+ Years	0-1 Years	2-5 Years	6-10 Years	10+ Years	Null	0-1 Years	10+ Years	Null
	9	17	17	95	10	22	20	94	129	176	75	346	28	8	26	61
Culture Average	4.62	4.64	4.41	4.39	4.07	4.45	4.31	4.24	4.45	4.23	4.05	3.93	3.73	4.26	3.60	3.90
I believe managers apply the same rules for all workers	4.67	4.59	4.06	4.18	3.50	4.32	4.35	3.90	4.44	4.03	3.60	3.57	3.52	4.14	3.04	3.60
Information about important events and lessons learned is shared within my work group	4.67	4.94	4.59	4.63	4.30	4.59	4.20	4.45	4.64	4.36	4.33	4.05	3.57	4.00	3.73	4.02
Leaders encourage people to ask questions	4.67	4.82	4.47	4.51	4.00	4.73	4.30	4.47	4.67	4.43	4.33	4.14	4.18	4.63	4.00	4.31
Managers treat workers with respect	4.67	4.82	4.41	4.60	4.20	4.73	4.70	4.48	4.63	4.38	4.32	4.06	3.79	4.13	3.65	3.98
My supervisor makes sure all employee concerns are heard before job decisions are made	4.56	4.53	4.18	4.35	4.20	4.50	4.35	4.23	4.38	4.20	3.93	3.97	3.75	4.29	3.65	3.84
My supervisor would use whatever power he/she has to help me out	4.67	4.76	4.65	4.53	4.50	4.73	4.60	4.51	4.65	4.42	4.35	4.29	3.96	4.75	3.96	4.11
People in my work group treat each other with respect	4.78	4.76	4.88	4.73	4.00	4.64	4.35	4.65	4.57	4.41	4.51	4.31	4.19	4.00	4.08	4.15
People listen to one another; it is rare that someone's views go unheard	4.56	4.47	4.29	4.25	4.30	4.18	4.30	4.07	4.35	4.10	3.91	3.79	3.54	4.00	3.46	3.85
People report mistakes they make, even if others do not notice them	4.44	4.29	4.18	3.93	3.80	4.05	3.90	3.71	3.98	3.94	3.71	3.55	3.44	3.86	3.23	3.62
The company cares about my opinions	4.56	4.41	4.41	4.17	3.90	4.09	4.05	3.88	4.26	3.98	3.56	3.55	3.33	4.63	3.23	3.53
Safety Average	4.59	4.58	4.66	4.56	4.15	4.52	4.31	4.37	4.46	4.32	4.26	4.12	3.78	4.30	3.90	4.02
Accidents & incidents are investigated completely	4.44	4.82	4.65	4.77	4.60	4.64	4.35	4.53	4.52	4.38	4.24	4.23	3.68	4.50	4.00	3.95
I stop people to point out unsafe behavior when I see it	4.44	4.29	4.59	4.44	3.60	4.36	4.25	4.45	4.24	4.19	4.28	4.11	3.82	4.00	3.85	3.97
I take responsibility for the safety of myself and others in my work area	4.78	4.82	4.88	4.80	4.80	4.77	4.65	4.82	4.63	4.60	4.71	4.56	4.18	4.57	4.46	4.44
Leaders keep people prepared to intervene when an emergency occurs	4.56	4.65	4.71	4.61	4.30	4.73	4.50	4.33	4.48	4.39	4.19	4.08	3.79	4.50	3.81	4.05
Leaders use mistakes and incidents as learning opportunities	4.67	4.71	4.76	4.64	4.50	4.55	4.45	4.35	4.60	4.44	4.32	4.06	3.75	4.50	3.85	4.13
Pausing work for hazards and safety concerns is viewed positively	4.78	4.88	4.76	4.79	4.70	4.64	4.60	4.62	4.73	4.53	4.55	4.39	4.11	4.63	4.12	4.07
People focus on one task at a time and avoid distractions	4.33	3.76	4.06	3.79	2.90	3.68	3.45	3.44	3.91	3.81	3.49	3.51	3.41	3.86	3.50	3.89
People have the ability to respond and correct problems and errors before they get out of control	4.56	4.59	4.76	4.44	3.90	4.36	4.15	4.17	4.39	4.23	4.07	3.98	3.61	4.00	3.77	3.85
People have the skills they need to resolve workplace safety issues	4.67	4.47	4.76	4.47	4.20	4.64	4.30	4.40	4.46	4.26	4.31	4.11	3.69	4.00	3.69	4.07
Stopping a job because a safety step is missing, is viewed positively by my supervisor	4.56	4.94	4.71	4.76	4.40	4.68	4.50	4.62	4.63	4.46	4.47	4.29	3.93	4.43	4.12	3.95
We have the right tools for the job	4.67	4.41	4.59	4.61	3.80	4.64	4.20	4.30	4.46	4.19	4.28	4.03	3.59	4.14	3.69	3.82
Wildfire Average	4.65	4.67	4.69	4.62	4.26	4.51	4.45	4.46	4.41	4.28	4.29	4.08	3.85	4.24	3.71	4.00
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	4.22	3.94	3.88	3.85	2.90	3.68	3.85	3.60	3.65	3.40	3.16	3.05	3.00	3.50	2.73	3.62
I feel comfortable discussing wildfire hazards with my supervisor	4.78	4.88	4.76	4.81	4.50	4.77	4.70	4.66	4.52	4.44	4.49	4.34	4.04	4.63	3.69	4.03
Leaders actively seek out signs of potential wildfire hazards	4.67	4.59	4.76	4.64	4.10	4.59	4.50	4.38	4.40	4.32	4.21	3.93	3.89	4.25	3.62	3.92
My workgroup follows procedures to control workplace and wildfire hazards	5.00	4.76	5.00	4.75	4.50	4.64	4.60	4.78	4.60	4.48	4.60	4.34	3.96	4.14	4.12	4.13
Our management acts quickly to address wildfire hazards	4.67	4.76	4.76	4.81	4.70	4.73	4.60	4.60	4.55	4.43	4.52	4.27	4.00	4.50	4.08	4.16
People in my work group report all wildfire hazards, no matter how minor	4.56	4.59	4.76	4.48	4.10	4.36	4.20	4.37	4.28	4.17	4.21	3.94	3.68	4.14	3.62	3.75
People look for wildfire hazards and risks as work progresses	4.56	4.76	4.76	4.68	4.10	4.45	4.45	4.39	4.37	4.31	4.31	4.08	3.82	4.00	3.54	3.90
Protecting the community from wildfire hazards is clearly a high priority with management	4.78	4.82	4.76	4.87	4.70	4.77	4.75	4.73	4.71	4.61	4.67	4.53	4.39	4.50	4.19	4.44
Wildfire and personal safety concerns are communicated openly	4.67	4.88	4.76	4.72	4.70	4.59	4.40	4.60	4.63	4.39	4.47	4.20	3.85	4.43	3.81	4.02

6.2 Management Self-Assessment Results

6.2.1 Graph of 2021 Management Self-Assessment: Current Status to 2022 Goal

SDGE Self-Assessment Categories and Questions
2021 Current Status | 2022 Goal

Categories & Questions	Requirement	Priority	Value	Who We Are
Organizational Sustaining Systems			●Value	●Who We Are
Wildfire safety integrated into leader selection and promotion				●Who We Are
Wildfire safety integrated into leader goals and objectives				●Who We Are
Safety incorporated into position descriptions			●Value	●Who We Are
Training available to frontline leaders			●Value	●Who We Are
Training available to frontline workers			●Value	●Who We Are
Training requirements for contractors			●Value	●Who We Are
Rewards and incentives to support safety			●Value	
Structure and Governance				●Who We Are
Accountable for wildfire safety outcomes				●Who We Are
Accountable for personal safety outcomes				●Who We Are
Wildfire measures tracked by senior leadership			●Value	
Effectiveness of wildfire measures				●Who We Are
Monitor and adjust strategies to wildfire safety				●Who We Are
Communication of wildfire safety metrics				●Who We Are
Safety Enabling Systems			●Value	●Who We Are
Investigations using root cause analysis			●Value	
Quality of event investigations			●Value	●Who We Are
Results of investigations			●Value	●Who We Are
Process for reporting wildfire hazards				●Who We Are
Systems to encourage sensitivity to weak signals				●Who We Are
Responding to upset conditions			●Value	●Who We Are
Process/structures to create a learning organization		●Priority	●Value	
Audits of wildfire hazard activities			●Value	
Use of audit findings and tracking to closure			●Value	

6.2.2   2021 Management Self-Assessment and Justification Part 1: Organizational Sustaining Systems

The yellow highlighted cell is where the corporation ranks itself at the time of the self-assessment (May 2021), and the light blue cell is where it expects to be at the end of 2022, if it expects its status to change.

The text in the "Justification" fields below is as it was received from the electrical corporation, presented without revision.

Organizational Sustaining Systems	Rating Levels			
	(1) Requirement	(2) Priority	(3) Value	(4) Who we are
1.1.1 Wildfire safety integrated into leader selection and promotion	Not Considered	Personal and wildfire safety performance are considered in selection/promotion decisions but are not the primary factors	Personal and wildfire safety performance are heavily weighted, primary factors in hiring / promotion decisions	Excellent personal and wildfire safety performance are necessary for advancement; poor safety performance eliminates leader from selection/promotion
Justification	Wildfire safety is the highest priority at SDG&E. Having wildfire prevention knowledge, safety experience, and prior safety performance is a significant factor during interviews for leadership positions and weighs heavily in the selection process. Individuals with a record of poor safety performance especially in the operational and wildfire area will not be selected for a leadership role. SDGE's high score in its 2020 Safety Barometer Survey results serves as evidence of how wildfire safety is embedded in our safety culture and leadership's performance.			
1.1.2 Wildfire safety integrated into leader goals and objectives	No annual goals / objectives related to wildfire safety	Goals and objectives focus on only lagging measures for wildfire or personal safety related to wildfire mitigation work	Goals and objectives contain a mix of leading[30] and lagging indicators for wildfire and personal safety related to wildfire mitigation work	Goals and objectives contain a mix of leading and lagging indicators including a focus on the quality of each leader's visible engagement in and support of wildfire and personal safety programs and initiatives
Justification	At SDG&E, frontline leaders' operational goals for safety, inspection and construction include a mix of leading and lagging indicators. Some examples of leading indicators are near misses and field observations. SDG&E ties frontline leader goals and objectives to various metrics that track wildfire safety. For example, frontline leaders prioritize clearing infractions in HFTD-Tier 3 in 3 months, which is before the 6-month due date. Additionally, all employees and contractors, that conduct activities in wildland areas of the service territory receive the Electric Standard Practice (ESP) 113.1 training on an annual basis which specifically addresses wildland prevention and fire safety.			
1.1.3 Safety incorporated into position descriptions	No mention of safety	Focus is on compliance with rules and dismissal if found out of compliance	Emphasis on more than just compliance with rules, but each employee's position description includes responsibility to speak up and intervene if unsafe conditions	Emphasis on each person's role and the expectation and mechanism to hold the organization accountable if unsafe conditions exist, both for wildfire and personal safety

---

[30] Leading Indicator: here, an input measure that is predictive of a future event.

Organizational Sustaining Systems	Rating Levels			
	(1) Requirement	(2) Priority	(3) Value	(4) Who we are
			exist, both for wildfire and personal safety	
Justification	Safety is embedded in SDG&E's culture. SDG&E emphasizes that each person in the organization has a responsibility to work safely and is accountable. Each employee has both the authority and responsibility to speak up and intervene by stopping the job if unsafe conditions exist, both for wildfire and personal safety. Some examples include, stop work authority, near-miss reporting, Behavioral Based Safety (BBS) and recently launched Serious Injury & Fatality (SIF) program.			
1.2.1 Training available to frontline leaders	No training available	Job-specific wildfire safety training focused on rules compliance, procedures, and safety systems (e.g. familiarity with wildfire-related job procedures or personal safety related procedures.)	Job-specific wildfire safety training; in addition, wildfire safety training beyond job requirements (e.g., wildfire mitigation strategy and initiatives), and leadership training (giving feedback, accountability, etc.)	All criteria in "value" option are met; In addition, training includes advanced safety topics such as exposure management[31], and human performance reliability[32]
Justification	At SDG&E, frontline leaders get job specific wildfire safety training and support resources are readily available to them to improve their safety leadership skills. The skilled leadership training program, electric safety center, Essentials of Supervision Training, human performance, effective communications, accountability, Just Culture Training, Respectful Workplace Overview Training, and crew field safety visits are some examples of training offerings provided to frontline leaders to develop their leadership skills. These trainings also touch on giving feedback and coaching behaviors.			
1.2.2 Training available to frontline workers	No training available	Job specific wildfire safety training focused on rules compliance, procedures, and safety systems (e.g. familiarity with wildfire-related job procedures or personal safety related procedures.)	Job-specific wildfire safety training; in addition, wildfire safety training beyond job requirements (e.g., wildfire mitigation strategy) and behavior-based safety training (observing safe behaviors, approaching others, etc.)	All criteria in "value" option are met; in addition, training includes advanced safety topics such as human performance reliability
Justification	At SDG&E, frontline workers get job specific wildfire safety training and support resources are made available to them to improve their wildfire safety skills. Respectful Workplace Training, training on procedures, skilled training, and Incident Command System (ICS), etc. are some examples of training provided to frontline workers to improve their wildfire safety awareness and knowledge. Annual PSPS exercises and Electric Standard Practice No. 113.1 (ESP 113.1) which specifically addresses wildland prevention and fire safety trainings are also provided for all Electric Regional Operations (ERO) field employees.			

---

[31] Exposure Management Training: here, a training that emphasizes a proactive approach to safety through identifying and controlling exposure for self and others and is foundational for leaders to move beyond the traditional and reactive incident management approach to safety.

[32] Human Performance Reliability: here, the suite of knowledge, skills and capabilities required to anticipate, control, and respond to unplanned issues and errors.

DEKRA

Organizational Sustaining Systems	Rating Levels			
	(1) Requirement	(2) Priority	(3) Value	(4) Who we are
1.2.3 Training requirements for contractors	No safety training required	Site or location specific general safety introduction and orientation	Electrical corporation-wide standardized safety training in addition to site-specific orientation	Electrical corporation-wide standardized safety training in addition to site-specific orientation and wildfire hazard awareness training
Justification	At SDG&E, all contractors are required to meet minimum personal safety and wildfire-specific training requirements. These requirements are in addition to site-specific orientation. Examples of such training include hazard awareness training, identifying infractions, review of written safety programs, patrol process etc. In addition, SDG&E requires that contractors and consultants also undergo wildland fire prevention training, and that they follow SDG&E's ESP 113.1.			
1.3.1 Rewards and incentives to support safety	No rewards or incentives specific to safety and wildfire safety	Rewards and incentives only focus on lagging indicators such as achieving no injuries or wildfires	Rewards and incentives emphasize lagging indicators for personal and wildfire safety and some leading indicators related to wildfire hazard mitigation activities	Rewards and incentives focus on leading activities such as reporting wildfire concerns, bringing innovative ideas to reduce wildfire hazards, and approaching others on safety
Justification	At SDG&E, rewards and incentives for operational leaders and workers support safety and mitigating wildfire hazards. The incentive compensation plan (ICP) emphasizes lagging goals such number of ignitions, vegetation contacts, wildfires caused by the utility, etc. The ICP structure also emphasizes leading goals such near misses, field safety observations, and resolving infractions.			

6.2.3   2021 Management Self-Assessment and Justification Part 2: Governance

The yellow highlighted cell is where the corporation ranks itself at the time of the self-assessment (May 2021), and the light blue cell is where it expects to be at the end of 2022, if it expects its status to change.

The text in the "Justification" fields below is as it was received from the electrical corporation, presented without revision.

Governance	Rating Levels			
	(1) Requirement	(2) Priority	(3) Value	(4) Who we are
2.1.1 Accountable for wildfire safety outcomes	Not defined	Safety department	Operational leadership[33] and Safety Department	Executive leadership[34] with Safety Department as trusted advisor
Justification	At SDG&E, executive leadership, in concert with SDG&E's safety department is accountable for supporting positive wildfire safety outcomes. Wildfire safety metrics are a component of every executive's compensation structure and incentive plan. Wildfire safety is a top priority at SDG&E, and executive leadership emphasizes consistent safety messaging to all levels of leadership and to SDG&E employees. Leaders at SDG&E have a strong partnership with the Safety department to seek ideas and guidance as a trusted advisor.			
2.1.2 Accountable for personal safety outcomes	Not defined	Safety department	Operational leadership and Safety Department	Executive leadership with Safety Department as trusted advisor
Justification	At SDG&E, safety is a core value. Every employee, including executive leadership, is responsible for their personal safety and the safety of others. Executive leadership, including SDG&E's Chief Safety Officer, with input from the safety department as trusted advisor, are accountable for safety outcomes. Safety metrics are a component of every executive's compensation and incentive structure.			
2.1.3 Wildfire measures tracked by senior leadership	No wildfire safety objectives	Leading and lagging wildfire safety measures required to be reported for regulatory purposes	Required safety measures for regulatory purposes. Additional leading measures used for wildfire mitigation work that are aligned to actionable initiatives	Required safety measures. Additional leading measures used for wildfire mitigation work that are aligned to actionable initiatives at each level of the organization
Justification	At SDG&E there are leading measures in place used for wildfire mitigation work that are aligned to actionable initiatives and tracked by senior operational leadership. For example, there is a dedicated patrol person focused in the HFTD to do continuous patrols effectively, which has reduced the number of vegetation-related outages. Another example is SDG&E's bi-annual employee Safety Barometer Survey which includes 4 questions specific to wildfire mitigation that measure how employees throughout the company feel about how SDG&E is prioritizing safety and mitigating risk. Other examples include safety observations, drone inspections (DIAR), ESP 113.1 and pre-patrols.			
2.2.1 Effectiveness of wildfire measures	Not effective	Reasonably effective in providing data and trends across company	Highly effective in providing data and trends in critical exposure areas	Highly effective in providing data and critical exposure area trends, and actionable insight

[33] Operational Leadership: here, levels of management within operations ranging from frontline supervisors (who have direct oversight of employees) to executive level senior operational leaders (e.g., COO).
[34] Executive Leadership: here, the highest level of management in an organization, reports to the CEO.

Governance		Rating Levels			
		(1) Requirement	(2) Priority	(3) Value	(4) Who we are
Justification		At SDG&E, wildfire safety measures are highly effective in providing data and critical exposure area trends, and actionable insight. For example, with the Enhanced Vegetation Management (EVM) program, based on the outages caused by vegetation, specific species are identified to target enhanced clearances. Other examples include specific equipment replacement programs identified by trends such as expulsion fuse replacement, lightening arrestors, SDG&E's wood to steel project, conductor replacement under FIRM project, strategic undergrounding (SUG) and applying covered conductor.			
2.2.2 Monitor and adjust strategies to wildfire safety		Never	Periodically (at even or uneven intervals; for example, once or twice a year as wildfire season approaches)	Often (at even or uneven intervals; for example, 3-5 times per year) monitors action plans and responds to emerging issues, and developments	Regularly (at even intervals; for example, monthly) monitors action plans and strategies. Conducts real time strategic problem solving focused on systemic risks[35]
Justification		At SDG&E, senior leadership reviews an operational dashboard on a weekly basis that includes fire weather conditions and fire potential index. SDG&E's leadership also uses SDG&E's mobile application, which can be viewed any time. Additionally, there are multiple meetings held on regular basis, such as, Fire Director Steering Committee, Executive Safety Board and Wildfire Safety Council meetings where leaders are held accountable wildfire safety, mitigation action items, follow-ups on fire events or leading indicators etc. SDG&E emphasizes outreach, interaction, input from our community at the quarterly Community Advisory Council, meetings with community safety partners to continue adjustments to wildfire safety strategies where deemed necessary			
2.2.3 Communication of wildfire safety metrics		Safety metrics are not shared	Lagging metrics for wildfire outcomes are posted at local/site operations[36]	Lagging and leading measures for wildfire safety are posted and discussed in regular management and supervisor meetings	Lagging and leading measures for wildfire safety are discussed; individual/team contributions to leading measures are highlighted and recognized publicly
Justification		At SDG&E, both lagging and leading measures for wildfire safety are discussed throughout the organization. Wildfire metrics are regularly reviewed with the employees, displayed on digital message boards and emails to employees. Additionally, individual and team contributions to the leading measures are highlighted and recognized publicly at community outreach forums, i.e. meetings with community safety partners, Community Advisory Council, social media, newsletters, etc.			

---

[35] Systemic Risks: here, vulnerabilities that could result in cascading or broad failures across the utility.
[36] Operations: here, the parts of a business that affect the production, distribution, and service necessary for a company to function. For the purposes of this assessment, electrical operations, field services, transmissions, substations, and distribution are considered part of operations, but generation is not.

6.2.4 2021 Management Self-Assessment and Justification Part 3: Safety-Enabling Systems

The yellow highlighted cell is where the corporation ranks itself at the time of the self-assessment (May 2021), and the light blue cell is where it expects to be at the end of 2022, if it expects its status to change.

The text in the "Justification" fields below is as it was received from the electrical corporation, presented without revision.

Safety-Enabling Systems	Rating Levels			
	(1) Requirement	(2) Priority	(3) Value	(4) Who we are
3.1.1 Investigations using root cause analysis[37]	Only fatal or serious incidents required to be reported to OSHA[38] or fire incidents required to be reported to CPUC[39]	All incidents required to be reported; in addition, work-related injuries involving days away from work and fire incidents that do not meet CPUC reporting standards	All incidents with the potential to be serious or fatal, including near misses	All high potential events and near misses. Also, event learning[40] teams evaluate high risk situations[41] for proactive opportunities to reduce exposure
Justification	SDG&E investigates all incidents with the potential to be serious or fatal, including near misses. Reporting may be anonymous, so there are times when a root cause analysis (RCA) can't be performed. For example, the Serious Injury & Fatality (SIF) program investigates incidents and near misses. Additionally, the Ignition Management Program tracks ignitions and potential ignitions, performs RCA on each ignition to detect correlations.			
3.1.2 Quality of event investigations	A "fix the employee" mentality is commonplace when addressing incidents or other adverse events	Investigations primarily focus on identifying exposure and the root cause of the exposure	Investigations focus on identifying the root cause of the exposure and describing actions to control the exposure	Incidents are regarded as learning events that spur a comprehensive look at, culture, processes, and safety systems that led to the event

---

[37] Root Cause Analysis: here, a systematic process for identifying root causes of problems or events and an approach for responding to them.
[38] OSHA Reportable Incidents: here, fatal and extremely serious injuries or illnesses, such as amputation, eye loss, in-patient hospitalization, or fatality, required to be reported to OSHA within defined time periods.
[39] CPUC Reportable Ignition: a fire-related event meeting the following conditions: (1) A self-propagating fire of material other than electrical and/or communication facility, (2) The resulting fire traveled greater than one linear meter from the ignition point, (3) The electrical corporation has knowledge that the fire occurred. Electrical corporations must submit to the CPUC information about this event that is useful in identifying operational and/or environmental trends relevant to the event. (See CPUC Decision 06-04-044 and Resolution E-4184.)
[40] Event Learning: here, an approach to understanding incidents and events that evaluates the entire system leading to an event to better understand the causes of actions. The focus of event learning is primarily on how to alter the system to make it less likely for the factors that caused the event to recur rather than to assign blame or define a single root cause factor.
[41] High Risk Situations: here, work activities or situations that have previously been shown in incident data to be consistent with serious or fatal incidents.

Safety-Enabling Systems	Rating Levels			
	(1) Requirement	**(2) Priority**	**(3) Value**	**(4) Who we are**
Justification	SDG&E's event investigations focus on identifying the root cause of the exposure and describing actions to control the exposure. As part of improving its safety culture, SDG&E's Safety department has established a comprehensive and robust incident investigation standard and reporting process. Applying this process uniformly across the Company will result in consistent investigations and will allow lessons learned to be shared broadly.			
3.1.3 Results of investigations	Reported to the regulator if required, but no systemic tracking, corrective actions, or closure/sharing of corrective actions	Corrective actions are tracked and are predominantly focused on rule changes, personal protective equipment, and training	Corrective actions are tracked to closure and include more focus on high value controls[42]; learnings are shared throughout organization	Systemic approach to tracking/closing actions using high value controls; lessons learned leveraged broadly across organization to effect change and control exposure (e.g. leading to procedural or policy changes throughout organization, where applicable)
Justification	SDG&E reviews all significant incidents and activations to identify potential improvements and establish a comprehensive and measurable After-Action Report (AAR). Additionally, SDG&E is evaluating whether the AAR program can align and integrate the processes with SDG&E's Safety Management System (SMS). The SMS provides a systematic, cohesive framework which builds upon SDG&E's strong safety culture and integrates new and existing processes. It also promotes improved communication, better documentation, enhanced coordination, and continuous improvement. Another example would be the Electric Citation Program Self Reporting.			
3.2.1 Process for reporting wildfire hazards	No formal process	Process exists to report wildfire hazards but no training or feedback	Process established and communicated widely; there is consistent follow-up to reduce exposure	Process established and communicated for wildfire hazard reporting; workforce trained and encouraged to report wildfire hazards; results broadly shared across organization to spur learning and exposure reduction
Justification	SDG&E has implemented various programs for frontline workers to recognize and report wildfire hazards. These include SDG&E's established inspection and maintenance programs, which promote safety for SDG&E personnel, the public and contractors, by providing a safe operating and construction environment. These programs also enable SDG&E personnel to identify and repair conditions to reduce potentially defective equipment on SDG&E's electric system to minimize hazards. Other examples include use of drone technology, patrols prior to RFW days, and post-PSPS patrols prior to restoration of outages. Annual ESP 113.1 training and monthly newsletter are some of the ways SDG&E communicates and shares takeaways across the organization.			

---

[42] High Value Controls: here, the hierarchy of controls consists of five layers of defenses used to protect against hazards in the workplace ranging from the most effective (Elimination) to the least effective (personal protective equipment or PPE). The layers are Elimination, Substitution, Engineering, Administrative, and PPE. High value controls are Elimination, Substitution, and Engineering because the effectiveness of the control is not susceptible to human error.

Safety-Enabling Systems		Rating Levels			
		(1) Requirement	(2) Priority	(3) Value	(4) Who we are
3.3.1 Systems to encourage sensitivity to weak signals[43]		No formal process or structure	Workforce is encouraged to report wildfire hazards as they see them	System established for reporting and mitigating wildfire hazards; leaders encourage reporting of weak signals	A cross-functional team is established to proactively look for, track, and mitigate wildfire hazards and potential black swan[44] situations
Justification		SDG&E has a team in concert with supporting systems and processes established to proactively make observations, report, and mitigate wildfire hazards. For example, programs such as the Ignition Management Program where electric troubleshooters (ETS) patrol to identify fire-related issues, report and mitigate wildfire hazards. Additionally, the Electric Risk Analysis (ERA)Team, PSPS pre-patrols, Drone Investigation Assessment Repair (DIAR) program, and vegetation patrols are all examples of process/programs to help identify fraying, strain or abrasion on wires or wind contact.			
3.3.2 Responding to upset conditions[45]		No formal training or preparation	Common upset conditions have been identified and response protocols are reviewed periodically	Simulations and drills[46] are conducted regularly to prepare the workforce	Simulations and drills are conducted regularly to practice responses to upset conditions and leaders have instilled a "what could go wrong?" mentality
Justification		SDG&E uses a utility-compatible Incident Command System (ICS) structure as an all-hazards framework to manage emergency incidents and events. This includes integration of ICS training and simulation exercises for leaders and the workforce, participation of field responders in Utility ICS training and After-Action Review (AAR) process to continue building and improving our capabilities in operational planning, and in response to wildfire, PSPS incidents, and all-hazards emergencies.			
3.3.3 Process/structures to create a learning organization[47]		Few processes, training or structures have been established for sharing safety-related lessons learned across the organization	Have implemented a knowledge management system for sharing safety-related best practices and incidents throughout the organization	All criteria met in "priority" option, plus processes exists for systematically using the knowledge management system and implementing safety-related best practices	All criteria met in "value" option, plus these processes for tapping best practices in knowledge management system are used routinely and by nearly everyone
Justification		SDG&E has implemented several programs and processes to maintain SDG&E's commitment to being a learning organization and sharing safety-related best practices and lessons learned throughout the organization. For example, Serious Injury & Fatality, Behavior Based Safety, and the Safety Barometer Survey, are all programs that are committed to implementing safety-related best practices company-wide to create a strong safety culture and place the highest priority on employee, customer, public safety and continuous learning and improvement.			

[43] Weak Signal: here, an indicator of a potentially emerging issue that may become significant in the future.

[44] Black Swan: here, unpredictable events that are beyond what is normally expected and have potentially severe consequences.

[45] Upset Conditions: here, interruptions in the regular running of work processes or other planned activity.

[46] Drills: here, coordinated, supervised activities designed to test work team responses to various planned upset conditions.

[47] Learning Organization: here, an organization skilled at creating, acquiring, and transferring knowledge, and at modifying its behavior to reflect new knowledge and insights.

Safety-Enabling Systems	Rating Levels			
	(1) Requirement	(2) Priority	(3) Value	(4) Who we are
3.4.1 Audits of wildfire hazard activities	No formal self-audits conducted	Site specific self-audits required; internal audits occur only after an incident has occurred	Site specific self-audits required; internal audits occur based on wildfire risk present	Systemic and rigorous self, independent, and internal audits conducted; used for alignment, calibration and learning
Justification	SDG&E performs internal audits based on the wildfire risk present. Examples include SDG&E conducts QA/QC audits within its wildfire hazard mitigation programs, including the vegetation management program, Corrective and Maintenance Program (CMP), and construction associated with material change. SDG&E regularly monitors its inspection programs to confirm inspection goals are met. In addition, SDG&E conducts an audit to ascertain the effectiveness of the inspections managed by SDG&E's operational and engineering managers. Moreover, SDGE's Distribution System utilizes Light Detection and Ranging (LiDAR) data to perform post-construction survey and pre-construction design specifications.			
3.4.2 Use of audit findings and tracking to closure	No formal tracking mechanism	Self-tracking of closures; no verification	Audit findings tracked and verified to closure	Audits tracked, implementations verified to closure, and effectiveness validated.
Justification	At SDG&E, internal safety audit findings are tracked to completion and corrective actions are put in place and verified. For regulatory audit findings, there is a follow up process ensuring that corrective actions have been completed. Additionally, Behavioral Based Safety (BBS) observation findings are tracked to closure and discussed at the monthly management meetings. Issues or findings brought up at Electric Safety Committee are also followed up and tracked through closure. Moreover, SDG&E has an After-Action Review program that identifies, tracks and assists groups to bring issues to closure.			

6.2.5 Summary Plan for the Following Year

The text in the table below the headings is as it was received from the electrical corporation, presented without revision.

A. Action/Activity	B. Deadline	C. Self-Assessment Reference(s). Indicate which question(s) on self-assessment this activity links to.
Update job profiles to include expectations related to safety and response to inclement weather events.	4th Quarter, 2021	1.1.3 To what extent is safety and the ability to work safely incorporated into position descriptions and expectations?
Field Supervisors will develop an individual professional development plan (IDP), focused on targeted skill growth between now and the end of 2022. The IDP's will focus on closing current skill gaps (to minimize risk), and to enhance current strengths to drive performance. Supervisors will have consistent touchpoints with their managers about their IDPs including needed resources, feedback, and progress. There will also be quarterly 60-90-minute Leadership Summits with all supervisors brought together for targeted training sessions on leadership topics such as communicating clearly, performance coaching, conflict management, and developing employees.	4th Quarter, 2021	1.2.1 To what extent are training and support resources available to frontline leaders to improve their safety leadership skills?
Improve training to build out SDG&E's incident command center at the field level and leverage technology for training programs, such as augmented reality and virtual reality for overhead visual inspections and identification of infractions.	4th Quarter, 2021	1.2.2 To what extent are training and support resources available to frontline workers to improve their wildfire safety skills?
Verify contractors are trained on specified written safety programs and ensure that contractor training meets SDG&E's minimum requirements.	4th Quarter, 2021	1.2.3 What are the personal safety and wildfire-specific training requirements of contractors?
SDG&E's Safety Management System (SMS) was established in 2020, and its Serious Injury & Fatality (SIF) Initiative was introduced in 2021. SDG&E's focus on learning events, culture, and processes will increase as these programs mature. Additionally, Near Miss Reports continue to increase and allow for additional investigations.	4th Quarter, 2022	3.1.2 Rate the quality of event investigations.
SDG&E's SMS takes a systematic and consistent approach to tracking incident reviews and follow-up action items to take corrective action to prevent future injury or reoccurrence. SDG&E's SMS was established in 2020. As this program matures, SDG&E will move toward its 2022 target where lessons learned are shared broadly across the organization.	4th Quarter, 2022	3.1.3 What happens with investigation results?

A. Action/Activity	B. Deadline	C. Self-Assessment Reference(s). Indicate which question(s) on self-assessment this activity links to.
Operating within the Incident Command System (ICS) framework, SDG&E's Emergency Management department created a Training and Exercise division to design and deliver capability-based training. The continued expansion and maturation of this division, along with the After-Action Review (AAR) counterpart process, will be instrumental to prepare our Operations workforce for an all-risk, all-hazard approach to emergency and wildfire response.	4th Quarter, 2022	3.3.2 What steps are taken to ensure frontline leaders and workforce can respond quickly to upset conditions.
Within the SMS framework, SDG&E established processes for systematically using the knowledge management system and implementing safety-related best practices. SDG&E has developed and is currently implementing its SMS processes. As these processes become operationalized and embedded within the organization, SDG&E will move towards its 2022 target.	4th Quarter, 2022	3.3.3 What processes and structures have been established to create a learning organization?

6.3 Safety Culture Objectives

The text in the tables below, other than the instructions and headings, is as it was received from the electrical corporation, presented without revision.

Instructions

Provide a description of the electrical corporation's objectives with respect to safety culture, over the next 12 months and over the next 3 years.

6.3.1 Safety Culture Objectives for the Next 12 months

A. Objective	B. Progress metrics or cultural indicators, if applicable, used to track progress against this objective	C. Target for 12 months from submission	D. Description of how this objective will reduce wildfire risk to the public or risk to employees conducting wildfire mitigation work
Continuously improving the safety culture by focusing on management leadership, worker participation, and a proactive approach to finding and fixing hazards	Number of near misses	200	Near miss reports are leading indicators that allow SDG&E to communicate and follow-up on reported hazards and incidents, including those that pose wildfire risk, to proactively reduce exposure or prevent future incidents. Near miss reports also indicate employees' comfort level in raising risks and trusting management to share and follow up to improve awareness and prevention.
	Environment and safety compliance management program (ESCMP) Findings Mediated	100%	Ensures when a safety incident (including wildfire safety incidents) occurs, it is documented in the system of record and an action plan is identified and tracked through completion in a timely manner.
	Number of Safety Observations	15,800	Safety observations of employees performing wildfire mitigation (e.g., pole hardening and undergrounding) and other work provide additional safety assurances and lead to positive engagement with employees. Safety observations identify and communicate safe and at-risk behaviors. This engagement shows up in many ways, with the key being increased trust and transparency and constant improvement of SDG&E's workplace safety culture and safety performance in all areas.

A. Objective	B. Progress metrics or cultural indicators, if applicable, used to track progress against this objective	C. Target for 12 months from submission	D. Description of how this objective will reduce wildfire risk to the public or risk to employees conducting wildfire mitigation work
	Number of Contractor Safety Observations	15,500	Safety observations of third-party contractors performing wildfire mitigation (e.g., vegetation management) or other work provide additional safety assurances that the work is being performed in a safe manner. Safety observations identify and communicate safe and at-risk behaviors. Coaching regarding avoidance of at-risk behaviors and recognition of safe behaviors help move SDG&E's safety culture forward and ultimately improve safety performance.

6.3.2 Safety Culture Objectives for the Next 3 Years

A. Objective	B. Progress metrics or cultural indicators, if applicable, used to track progress against this objective	C. Target for 36 months from submission	D. Description of how this objective will reduce wildfire risk to the public or risk to employees conducting wildfire mitigation work
Continuously improving the safety culture by focusing on management leadership, worker participation, and a proactive approach to finding and fixing hazards	Number of Stop the Job/Stop the Task	TBD as a tool to document/track is under development	Encouraging and tracking Stop the Job/Stop the Task indicates employees' comfort levels in speaking up, risk awareness, and trust. Employees are empowered and encouraged to Stop the Job/Stop the Task when performing all work, including wildfire mitigation work, if the task is perceived to be unsafe.
	Number of Serious Injury or Fatality (SIF) investigations completed	TBD as this program is currently being rolled-out	Performing a root cause analysis/in-depth investigation into incidents that could have or caused serious injury or fatality, including wildfire-related incidents, allows for identification of corrective actions and/or preventative actions to reduce risk and exposure.
	Number of near misses	2021 target 200 / beyond 2021 TBD	Near miss reports allow SDG&E to communicate and follow-up on reported hazards and incidents, including those that pose wildfire risk, to proactively reduce exposure or prevent future incident. Near miss reports also indicate employees' comfort level in raising risk issues and trusting management to share and follow up to improve awareness and prevention.
	Number of Safety Observations	2021 target 15,800 / beyond 2021 TBD	Safety observations of employees performing wildfire mitigation (e.g., pole hardening, undergrounding) and other work provide additional safety assurances and lead to positive engagement with employees. This engagement shows up in many ways, including building trust and transparency to improving SDG&E's workplace safety culture and ultimately safety performance in all areas.
	Number of Contractor Safety Observations	2021 target 15,500 / beyond 2021 TBD	Safety observations of third-party contractors performing wildfire mitigation (e.g., vegetation management) or other work provide additional safety

A. Objective	B. Progress metrics or cultural indicators, if applicable, used to track progress against this objective	C. Target for 36 months from submission	D. Description of how this objective will reduce wildfire risk to the public or risk to employees conducting wildfire mitigation work
			assurances that the work is being performed in a safe manner. Safety observations identify and communicate safe and at-risk behaviors. Coaching regarding observation of at-risk behaviors and recognition of safe behaviors help move SDG&E's safety culture forward and ultimately improve safety performance.
	ESCMP Findings Mediated	100% is always the target	Ensures when a safety incident (including wildfire safety incidents) occurs it is documented in the system of record (SIMS) and an action plan is identified and completed in a timely manner.

DEKRA

6.4   Lessons Learned

The text in the table below, other than the instructions and headings, is as it was received from the electrical corporation, presented without revision.

Instructions

Describe how the electrical corporation's objectives and priorities with respect to safety culture have evolved over the past year. Outline any major themes and lessons learned over the past 12 months and subsequent actions taken. If you have not completed a safety culture assessment in over three years, consider your safety culture as it exists today and describe the major themes that exist today.

6.4.1   Lessons Learned Since Most Recent Safety Culture Assessment

A. Major Themes or Lessons Learned	B. Actions Taken
Management Commitment: Management Participation items describe ways in which top and middle management demonstrate their leadership and commitment to safety in the form of words, actions, organizational strategy, and personal engagement with safety.	Examples of top management demonstrating their leadership and commitment to safety include: • Monthly Executive Safety Council Meetings – these meetings are held at various Company locations and integrate employee and supervisor dialogue sessions so that employees have an opportunity to share safety experiences with Company leadership. • Chief Safety Officer and management participation in monthly Electric Safety Sub-committee meetings • Chief Safety Officer and management participation in monthly Behavior Based Safety (BSS) meetings • Barometer results: Management participation score improved from 91.7 in 2018 to 98.3 in 2020.
Supervisor Engagement: Supervisor Participation items consider six primary roles through which supervisors communicate their personal support for safety: leader, manager, controller, training, organizational representative, and personal engagement with safety.	Supervisor Engagement improved with supervisors providing safety training and addressing methods to reduce employee concerns regarding reporting safety problems. For example: • Increased field safety visits at the supervisor level to improve in the area of supervisor engagement. • Developed and implemented training curriculum and testing program for supervisors and working foreman to enhance their leadership skills. Barometer results: Supervisor participation score improved from 90.8 in 2018 to 99.0 in 2020.
Employee Involvement: Employee Participation items specify selected actions and reactions that are critical to making a safety program work. Emphasis placed on personal	SDG&E increased measures to promote safety awareness and promoted an active role in incident investigations and in identifying and eliminating hazards. For example: • SDG&E experienced an increased number of near miss events reported by employees. Although near miss submissions are typically reported anonymously, recently more employees are including their name to assist with proper follow up.

A. Major Themes or Lessons Learned	B. Actions Taken
engagement, responsibility, and compliance.	• Implemented a specific skills audit team from the Skill Training Center that visited the field in addition to district leadership site visits to look at safety items. Having ongoing dialogue with employees is another example that led to improved employee engagement and response. Barometer results: Employee participation score improved from 85.3 in 2018 to 95.8 in 2020.

Safety Support Activities: Safety Support Activities items probe the presence or quality of various safety program practices, with a focus on communications, training, inspection, maintenance, and emergency response.	SDG&E improved the frequency of detailed and regularly scheduled inspections and focused on improving safety training for new employees. For example:
	• SDG&E's Behavioral Accident Prevention Process (BAPP®), formerly referred to as the Behavior Based Safety (BBS) Process, which is a partnership between management and volunteers, front-line employees (employee-led and management-supported).
	   o This program provides a structured process for continuous safety improvements specific to the high-risk tasks and situations faced by front-line employees.
	   o BAPP volunteers rely on hazard and risk assessment checklists, developed from historical injury analytics, to perform observations focused on key areas of "critical risk."
	   o BAPP volunteers conduct on the spot accountability conversations, defining "Safe" and "At Risk" behaviors, and collect safety data.
	   o Data provided from the BAPP is further analyzed and utilized to identify and further act on undiagnosed risk exposure.
	   o The BAPP teams work with leadership to drive hazard and risk removal and mitigation efforts.
	Barometer Results: Safety Support Activities score improved from 89.0 in 2018 to 96.9 in 2020.

Safety Support Climate: Safety Support Climate items asked employees across the organization for general beliefs, impressions, and observations about management's commitment and underlying values with regards to safety.	SDG&E improved the status and value of safety committees and more management focus from supervisors on how they think about safety. This improved focus by management also demonstrated management's ongoing commitment to the various safety programs (Ex: BBS, Near-Miss Reporting). • SDG&E's Near Miss Reporting program: SDG&E encourages employees to report close calls in SDG&E tailgates, safety meetings, through an online process, or by using a newly developed smart device application. Reporting online or through the app allows employees to report anonymously. The information is submitted to Safety Services for review and then is shared with employees throughout the company, so they can better understand and benefit from overall awareness and lessons learned Barometer results: Safety Support Climate score improved from 89.8 in 2018 to 98.6 in 2020.
Organizational Climate: Organizational Climate items probe general conditions that interact with the safety program to affect its ultimate success, such as teamwork, morale, and employee turnover.	SDG&E implemented more frequent contact and communication between employees and management to improve the stability of the workforce, employee morale, and departmental teamwork. For example: • SDG&E's Safety Management System (SMS) o SDG&E's SMS is the framework that ties together each of our existing and future safety initiatives, aligns our core operating units, integrates risk and safety, and allows SDG&E to assess risk across the entire organization for continued improvement and enhanced safety performance.

A. Major Themes or Lessons Learned	B. Actions Taken
	o The SMS affirms and provides further awareness and engagement to SDG&E's safety programs by providing, for example, greater communication, broad sharing of information and utilization of lessons learned, strengthened employee feedback mechanisms, and processes for consistent follow-up broad assessment. Barometer results: Organizational Climate score improved from 75.6 in 2018 to 97.4 in 2020.

7. Glossary of Terms

Term	Definition
Behavior-Based Safety (BBS)	A broad term used to describe programs for improving workplace safety by observing and analyzing employees' behavior while they work.
Black Swan	Unpredictable events that are beyond what is normally expected and have potentially severe consequences.
CPUC Reportable Ignition	A fire-related event meeting the following conditions: (1) A self-propagating fire of material other than electrical and/or communication facility, (2) The resulting fire traveled greater than one linear meter from the ignition point, (3) The electrical corporation has knowledge that the fire occurred. Electrical corporations must submit to the CPUC information about this event that is useful in identifying operational and/or environmental trends relevant to the event. (See CPUC Decision 06-04-044 and Resolution E-4184.)
Drills	Coordinated, supervised activities designed to test work team responses to various planned upset conditions.
Event Learning	An approach to understanding incidents and events that evaluates the entire system leading to an event to better understand the causes of actions. The focus of event learning is primarily on how to alter the system to make it less likely for the factors that caused the event to recur rather than to assign blame or define a single root cause factor.
Executive Leadership	The highest level of management in an organization, reports to the CEO.
Exposure	A state of vulnerability to injury that exists when a person comes in contact with a hazard. Exposure reduction or exposure control results from separating the person from the hazard and protecting the person from the vulnerability raised by the hazard (for example, by wearing protective equipment).
Exposure Management Training	A training that emphasizes a proactive approach to safety through identifying and controlling exposure for self and others and is foundational for leaders to move beyond the traditional and reactive incident management approach to safety.

Term	Definition
Failsafe	A system or plan that comes into operation in the event of something going wrong or that is there to prevent such an occurrence.
Frontline Supervisors	The first level of leadership that has direct oversight of employees within operational units of the organization.
High Risk Situations	Work activities or situations that have previously been shown in incident data to be consistent with serious or fatal incidents.
High Value Controls	The hierarchy of controls consists of five layers of defenses used to protect against hazards in the workplace ranging from the most effective (Elimination) to the least effective (personal protective equipment or PPE). The layers are Elimination, Substitution, Engineering, Administrative, and PPE. High value controls are Elimination, Substitution, and Engineering because the effectiveness of the control is not susceptible to human error.
Human Performance Reliability	The suite of knowledge, skills and capabilities required to anticipate, control, and respond to unplanned issues and error.
Incident	An unplanned, undesired event that adversely affects normal operations.
Individual Contributor	An employee who is not in a management position or has any employees directly reporting to them.
IOU	Investor-owned utility.
ITO	Independent transmission operator.
Lagging Indicator	An outcome or output measure that is backward-looking, describing a past event.
Leading Indicator	An input measure that is predictive of a future event.
Learning Organization	An organization skilled at creating, acquiring, and transferring knowledge, and at modifying its behavior to reflect new knowledge and insights.
Likert Scale	A rating system commonly used in questionnaires and survey research to measure people's attitudes, perceptions, and opinions.

Term	Definition
Near Miss	An unplanned event that did not result in injury, illness, or damage, but had the potential to do so.
Operations	The parts of a business that affect the production, distribution, and service necessary for a company to function. For the purposes of this assessment, electrical operations, field services, transmissions, substations, and distribution are considered part of operations, but generation is not.
Operational Leadership	Levels of management within operations ranging from frontline supervisors (who have direct oversight of employees) to executive level senior operational leaders (e.g., COO).
OSHA Reportable Incidents	Fatal and extremely serious injuries or illnesses, such as amputation, eye loss, in-patient hospitalization, or fatality, required to be reported to OSHA within defined time periods. "OSHA" stands for the Occupational Safety and Health Administration of the United States Department of Labor.
Root Cause Analysis	A systematic process for identifying root causes of problems or events and an approach for responding to them.
SMJUs	Small and multi-jurisdictional utilities.
Systemic Risk	Vulnerabilities that could result in cascading or broad failures across the utility.
Upset Conditions	Interruptions in the regular running of work processes or other planned activity.
Weak Signal	An indicator of a potentially emerging issue that may become significant in the future.

8. Other Attachments

8.1 Written Comments from SDG&E

Following are the written comments from SDG&E dated August 31, 2021, "RE: COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) IN RESPONSE TO THE DRAFT SAFETY CULTURE ASSESSMENT REPORT."

Laura M. Fulton
Senior Counsel
8330 Century Park Court, CP32F
San Diego, CA 92123-1548

LFulton@SDGE.com

August 31, 2021

VIA E-MAIL

Caroline Thomas Jacobs
Director, Wildfire Safety Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Case No. 2021-SCAs

**RE: COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) IN
RESPONSE TO THE DRAFT SAFETY CULTURE ASSESSMENT REPORT**

Dear Director Thomas Jacobs:

San Diego Gas & Electric Company (SDG&E) provides its comments in response to the draft Safety Culture Assessment (SCA) report for SDG&E conducted by DEKRA on behalf of the Office of Energy Infrastructure Safety (Energy Safety) in fulfillment of Public Utilities Code Section 8389(d)(4).[1]

SDG&E appreciates the opportunity to provide responses to the Safety Culture Assessment report provided to SDG&E on August 25, 2021. SDG&E generally believes that allowing SDG&E time to identify and correct any factual information included in the report assists Energy Safety and stakeholders to understand the final Safety Culture Assessment reports.

At the outset, SDG&E appreciates the thorough and thoughtful manner in which DEKRA conducted its review and the work that went into drafting the report. SDG&E wishes to respectfully clarify that Behavior-Based Safety is a nationally established program that includes guidelines regarding identification of daily behaviors and emphasizing safe everyday choices. As such SDG&E will endeavor to integrate wildfire hazard inspections and observations within its BBS training and programs to the extent possible within the BBS framework.[2] Some recommendations may be better implemented within other safety initiatives to reach the desired audience and obtain the greatest impact. With that clarification, SDG&E agrees with the recommendations of the Safety Culture Assessment report and expresses its commitment to work with DEKRA and Energy Safety on their implementation.

Respectfully submitted,

/s/ Laura M. Fulton
Attorney for
San Diego Gas and Electric Company

---

[1] *San Diego Gas & Electric 2021 Safety Culture Assessment – DRAFT.*
[2] *San Diego Gas & Electric 2021 Safety Culture Assessment – DRAFT at p. 16*