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**Subject: 2023 Safety Culture Assessment for San Diego Gas & Electric Company**

Mr. Geraghty:

Enclosed is the 2023 Safety Culture Assessment (SCA) for San Diego Gas & Electric Company (SDG&E) presenting the findings (including recommendations) of the assessment conducted by the National Safety Council (NSC) on behalf of the Office of Energy Infrastructure Safety (Energy Safety) pursuant to the process approved through Public Utilities Code section 8389(d)(4).

On February 23, 2024, Energy Safety provided SDG&E with a draft of its 2023 SCA for factual review. On March 8, 2024, SDG&E provided its written response to Energy Safety. Energy Safety considered SDG&E's written response and determined that no corrections to the draft SCA were necessary. Section 6 of the enclosed SCA includes SDG&E's full written response to the draft 2023 SCA for SDG&E.

SDG&E can satisfy the "good standing" requirement in Public Utilities Code section 8389(e)(2) by agreeing to implement the findings (including recommendations) of its most recent SCA performed pursuant to Public Utilities Code section 8386.2 and section 8389(d)(4), if applicable. This may be done by SDG&E submitting a letter to this effect to the 2023 Safety Culture Assessments docket (Docket #2023-SCAs).<sup>1</sup>

Sincerely,

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

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

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

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



OFFICE OF ENERGY  
INFRASTRUCTURE  
SAFETY



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

## San Diego Gas & Electric Company

Prepared by the National Safety Council

Published March 2024





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## Executive Summary

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The Office of Energy Infrastructure Safety's (Energy Safety's) third annual Safety Culture Assessment of electrical corporations in California took place from June to September 2023. Energy Safety directed the process pursuant to the requirements of Public Utilities Code section 8389(d)(4). The process was carried out by Energy Safety's Safety Culture Assessment contractor. In 2023, Energy Safety's Safety Culture Assessment contractor was the National Safety Council.

According to its Safety Culture Assessment inputs in 2021, 2022, and 2023, San Diego Gas & Electric Company (SDG&E) has exhibited continued commitment to advancing its safety culture maturity. SDG&E's 2023 management self-assessment demonstrates an organization that considers itself at the highest level of maturity for 21 of the 22 questions and anticipates reaching the highest level of maturity for the final question in 2024. SDG&E generated positive results on the 2023 workforce survey, with 17 of the 30 statements showing year-over-year improvement. While scores for the nine statements concerning wildfire safety decreased slightly from 2022, scores for all 30 survey statements were higher compared to the baseline year of 2021, an achievement unique to SDG&E among electrical corporations participating in the workforce survey. Since 2021, the workforce survey and focus groups with frontline employees, contractors, and supervisors has revealed that workers recognize SDG&E's commitment to personal safety and overall culture.

To maintain positive momentum, SDG&E should continue to demonstrate its commitment to safety by focusing on opportunities to improve its safety culture. The 2023 assessment shows that SDG&E should continue to reduce barriers to the prioritization of safety over job task goals and build on its efforts to advance as a learning organization.

To drive consistent improvement in its safety culture throughout the organization, SDG&E should act on the recommendations listed below.



- SDG&E should develop and implement actions to reduce perceived performance pressure and distractions. Leaders at SDG&E should consistently demonstrate to workers that safety is the top priority through words, decision making, and actions, especially as it pertains to distractions and perceived pressures to perform.
- SDG&E should continue to act on the 2022 recommendation to build on its efforts to track trends in safety event-related reporting, specifically tracking the quality of near-miss investigations and continuing to develop its Ignition Management Program.
- SDG&E should continue to recognize and take action to mitigate the risk exposure posed by interactions with the public.
- SDG&E should increase engagement on the safety culture assessment within the workforce supporting wildfire mitigation initiatives.

# 1 Safety Culture Assessment

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## 1.1 Safety Culture Assessment Framework

The Office of Energy Infrastructure Safety's (Energy Safety's) Safety Culture Assessment (SCA) process is described in the Safety Culture Assessment Guidelines for Electrical Corporations (SCA Guidelines).<sup>1</sup> The SCA Guidelines are informed by the SCA process as set out in Resolution SPD-6, adopted by the California Public Utilities Commission (CPUC) on December 1, 2022.<sup>2</sup> The framework for Energy Safety's SCA, included in Resolution SPD-6,<sup>3</sup> is rooted in the belief that safety culture affects both personal and wildfire safety outcomes and by extension its study provides insights into strengths and key opportunities for improvement.

## 1.2 Overview

Pursuant to Public Utilities Code Section 8389(d)(4),<sup>4</sup> Energy Safety must conduct an annual SCA for each California electrical corporation.<sup>5</sup> Energy Safety contracted the

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<sup>1</sup> [Safety Culture Assessment Guidelines for Electrical Corporations \(April 2023\)](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true>, accessed Feb. 28, 2024).

<sup>2</sup> [Resolution SPD-6 "Resolution Adopting Safety Culture Assessment Process for Electrical Corporations Pursuant to Public Utilities Code § 8389\(d\)\(4\)"](#)

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

<sup>3</sup> [Resolution SPD-6 "Resolution Adopting Safety Culture Assessment Process for Electrical Corporations Pursuant to Public Utilities Code § 8389\(d\)\(4\)"](#) page 11

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

<sup>4</sup> [The full text of Public Utilities Code section 8389](#)

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

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

National Safety Council (NSC)<sup>6</sup> to conduct the third annual SCA, which took place between June and September 2023.

### 1.2.1 Focus of Energy Safety's SCA

Energy Safety's SCA is distinct and complementary to other safety culture assessments required elsewhere in the Public Utilities Code. Energy Safety's SCA is not a replacement for ongoing work to improve safety culture at each electrical corporation. Energy Safety's SCA specifically focuses on the safety culture present in the wildfire mitigation work setting: the setting most pertinent to risks faced by the wildfire mitigation workforce in terms of personal risk and risks faced by the public in terms of wildfire risk. Energy Safety's goal is to develop a longitudinal view of safety culture across electrical corporations to identify best practices and relative gaps. Energy Safety seeks to understand outcomes over time and incorporate continuous learning into the assessment process.

### 1.2.2 Energy Safety's SCA Components

Energy Safety published the 2023 SCA Guidelines in April 2023.<sup>7</sup> The SCA Guidelines outline the SCA framework, components, and requirements for each category of electrical corporation. The SCA Guidelines categorize electrical corporations as follows:

- **Large electrical corporations, also called investor-owned utilities<sup>8</sup> (Large IOUs):** Pacific Gas and Electric Company, San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company.

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

<sup>7</sup> [Safety Culture Assessment Guidelines for Electrical Corporations \(April 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true, accessed Feb. 28, 2024). See [Energy Safety's Safety Culture Assessments web page](https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-%20safety/safety-culture-assessments/) for more information (https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-%20safety/safety-culture-assessments/, accessed Sept. 28, 2023).

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

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

The 2023 SCA process included a management self-assessment with a summary plan for 2024, 12-month and 3-year safety culture objectives, lessons learned, progress on the 2022 SCA recommendations, a workforce survey, and follow-up interviews to give context and clarity to the management self-assessment (one interview) and workforce survey (one interview in the form of a focus group session). See below for more details about each of these components. The SCA Guidelines require different categories of electrical corporations to complete different components of the SCA as follows:<sup>9</sup>

Component	Electrical corporations that must complete this component	Commentary
Workforce survey	Large IOUs, SMJUs	Energy Safety uses the workforce survey to assess key workforce perceptions and behaviors at the large and small electrical corporations, but not the independent transmission operators, where the workforces are too small to ensure the anonymity of respondents.
Management self-assessment with	Large IOUs	Energy Safety uses the management self-assessment, a detailed assessment of organizational systems, to

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



Component	Electrical corporations that must complete this component	Commentary
summary plan for the coming year		evaluate the larger, more complex electrical corporations.
Safety culture objectives and summary of lessons learned (including reporting on implementation of recommendations)	Large IOUs, SMJUs, ITOs	Energy Safety uses the safety culture objectives and summary of lessons learned in the evaluation of all electrical corporations. This is the only requirement for ITOs, which are small organizations with a lower risk profile than the large IOUs and SMJUs.
Interviews	To be determined by Energy Safety upon review of submissions	Interviews may be required of any electrical corporation.
Observational visits	To be determined by Energy Safety upon review of submissions	Observational visits may be required of any electrical corporation.
Supporting documentation	To be determined by Energy Safety upon review of submissions	Supporting documentation may be required of any electrical corporation.

Below are descriptions of the different components of the 2023 SCA.

### 1.2.2.1 Workforce Survey

The workforce survey was administered by NSC (via the electrical corporations) and consisted of 30 statements covering three dimensions of safety culture: wildfire safety, personal safety, and overall culture. These were the same statements as those used on the 2021 and 2022 workforce survey. It was targeted at employees and contractors who spend at least 10 percent of their time engaged in wildfire mitigation activities.

Respondents rated the statements on a five-point scale from strongly agree on the high end to strongly disagree on the low end.<sup>10</sup> The statements are framed in a positive light (e.g., “managers treat workers with respect”), so greater agreement—and an associated higher score—indicates a better opinion of the organization’s performance.

NSC assisted the electrical corporations in administering the workforce survey within the period of June 26 to July 24, 2023. NSC provided electronic survey administration options and provided Spanish translation upon request.

### 1.2.2.2 Management Self-Assessment with 2024 Summary Plan

The management self-assessment was only completed by the large electrical corporations in the 2023 SCA process.

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

Unlike some components of the SCA that are only applicable to some electrical corporations (see Section 1.2.2), each electrical corporation is required to submit its safety culture objectives, summary of lessons learned, and progress on the previous year’s

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<sup>10</sup> The survey used a Likert scale going from “Strongly Agree” (5) to “Strongly Disagree” (1). NSC calculated average response scores based on the answers of the respondents. For more information on Likert scales, see [“What is a Likert Scale – Definition, example, characteristics, & advantages” by Question Pro](https://www.questionpro.com/blog/what-is-likert-scale/) (https://www.questionpro.com/blog/what-is-likert-scale/, accessed Sept. 29, 2023).

recommendations.<sup>11</sup> Electrical corporations submitted these using an online survey administered by NSC.

In this component, the electrical corporations presented their 12-month and 3-year safety culture objectives, target and progress metrics, and a description of how the objectives will reduce wildfire risk.

Electrical corporations also presented their lessons learned and a description of progress made on their 2022 SCA recommendations.

#### **1.2.2.4 Interviews**

Follow-up interviews were only conducted with the large electrical corporations in the 2023 SCA process. These interviews were intended to give context and clarity to SCA inputs and consisted of two interviews per electrical corporation: one to follow-up on the management self-assessment and one to follow-up on the workforce survey (in the form of a focus group session).<sup>12</sup>

#### **1.2.2.5 Observational Visits**

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

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<sup>11</sup> See Section 2 “Application of Safety Culture Assessment Components to Different Electrical Corporations,” [Safety Culture Assessment Guidelines for Electrical Corporations \(April 2023\)](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true) (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true, accessed Feb. 28, 2024).

<sup>12</sup> Note that in 2023, there was a single workforce focus group session per large electrical corporation, whereas in 2022, there were three such sessions per large electrical corporation.

### 1.2.2.6 Supporting Documentation

The SCA Guidelines provide that Energy Safety may ask for supporting documentation.<sup>13</sup> For example, Energy Safety may require documentation to support justifications given for electrical corporations' self-ratings in the management self-assessment.

The online survey used to elicit safety culture objectives, summary of lessons learned, and progress on 2022 recommendations permitted electrical corporations to upload additional supporting documentation as attachments to illustrate actions taken since the 2022 SCA.

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<sup>13</sup> See the [Safety Culture Assessment Guidelines for Electrical Corporations](#) Section 6.2 “Documentation to Support Responses to the Management Self-Assessment” for more information about supporting documentation Energy Safety may require (<https://efiling.energy-safety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true>, accessed Sept. 28, 2023).

## 2 SDG&E Inputs and Findings

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### 2.1 SDG&E Inputs to the SCA

The findings and recommendations below are based on SDG&E’s inputs to the 2023 SCA, including its management self-assessment with 2024 summary plan, safety culture objectives, lessons learned, progress on 2022 recommendations, a workforce survey, the management self-assessment follow-up interview with contributors to the assessment, and the workforce interview in the form of a focus group session with members of the workforce targeted by the workforce survey: those who spend at least 10 percent of their time engaged in wildfire mitigation activities.<sup>14</sup> As a large electrical corporation, SDG&E was required to complete all components of the SCA process.

In 2023, the first step of the SCA process was submission of the management self-assessment with a summary plan for 2024, safety culture objectives, lessons learned, and progress on 2022 recommendations. SDG&E submitted these components on July 7, 2023.

SDG&E also voluntarily appended two supporting documents.<sup>15</sup> Included in the supporting documents are SDG&E’s complete responses for the “Justification” fields pertaining to the management self-assessment questions.

On July 28, 2023, NSC conducted a 90-minute follow-up interview with SDG&E’s contributors to the management self-assessment and accompanying components. In the interview, NSC asked questions to better understand SDG&E’s practices regarding leadership selection and promotion practices, training and support resources for frontline workers, the level of accountability for wildfire safety, wildfire safety measures, SDG&E’s

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<sup>14</sup> See Section 5 for SDG&E’s safety culture objectives, lessons learned, progress on 2022 recommendations, and 2023 workforce survey results.

<sup>15</sup> See the supporting documentation appended at the end of Section 5.

event investigation process, and the use of safety audits for wildfire mitigation activities.

Following receipt of the management self-assessment and accompanying components, NSC (via SDG&E) administered the SDG&E workforce survey using an anonymous online survey between June 26 and July 24, 2023. NSC encouraged SDG&E to invite individuals within the target audience of employees and contractors who spend at least 10 percent of their time engaged in wildfire mitigation activities.

A total of 1,900 SDG&E employees and contractors responded to the workforce survey. Of these, 1,486 identified as employees, 393 identified as contractors, and 21 did not identify their employee status. SDG&E reported a base number of 2,360 employees and 853 contractors working on wildfire mitigation. With these base numbers, SDG&E achieved a 59 percent overall response rate for its wildfire mitigation workforce with an employee response rate (excluding contractors) of 63 percent, compared to an 87 percent employee response rate in 2022 and an 80 percent employee response rate in 2021.<sup>16</sup> Notably, the base wildfire mitigation workforce (including employees and contractors) increased by over 50 percent from 2022 to 2023 (increasing from 2,064 to 3,213).

Finally, following the initial analysis of workforce survey data, NSC conducted a single focus group session for SDG&E frontline workers, frontline supervisors, and contractors who play a direct role in wildfire mitigation. As in 2022, NSC conducted the focus group session using an online virtual meeting platform, with an option to join via a teleconference line. The SDG&E focus group session was held on September 7, 2023.

The purpose of the focus group was to better understand how frontline workers, contractors, and supervisors view the organization's safety culture and identify priority areas for improvement. The focus group session followed a semi-structured format including open-ended prompts that allowed for further questioning to gain insights into the following:

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<sup>16</sup> Although the 2022 survey included a paper option and the 2023 did not, the proportions of different categories of employees represented in the responses remained stable across from 2022 to 2023.

- What are the top three hazards you face on the job?
- How would you describe the safety culture in your organization?
- What shortcuts do people take? How are wildfire hazards identified and communicated to you?
- How are lessons learned about safety or wildfire mitigation communicated to you?
- How are frontline employees involved in company-wide safety meetings and how can these meetings be improved?
- How do daily safety meetings help keep you safe and how can daily safety meetings be improved?
- What changes have you seen in safety culture in your organization or work group?
- How does the organization address safety issues (including wildfire hazards) that are reported by frontline workers?
- How does the organization incentivize the reporting of near misses?<sup>17</sup>
- How well do people work together in your work group?
- What are three words to describe the safety culture of your organization?

A total of seven individuals participated in the focus group, representing different employment levels and SDG&E business units. Of the seven focus group participants,

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<sup>17</sup> Near miss: an unplanned event that did not result in injury, illness, or damage, but had the potential to do so. [Safety Culture Assessment Guidelines for Electrical Corporations \(April 2023\)](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true) (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true, accessed Feb. 28, 2024).

three were frontline employees and four were supervisors. Although contractors were invited, no contractors participated in the focus group. However, one participant identified as a former SDG&E contractor.

Fatigue was mentioned by multiple focus group participants as one of the top hazards faced on the job. Participants described the safety culture at SDG&E as having “shifted immensely” to “very good” and one participant remarked that the “culture is getting better.” Participants positively shared about SDG&E, emphasizing collaboration between business units and an increased frequency of tailgate or tailboard safety meetings. Focus group participants also noted that near-miss reports have become more relevant, after a peak of people reporting near-misses that were not serious threats to safety in the post-COVID return-to-work period.

## 2.2 Strengths

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

### 2.2.1 Commitment to Safety Culture

SDG&E exhibited continued growth in safety culture maturity as demonstrated in its 2023 management self-assessment responses and workforce survey results. SDG&E’s 2023 management self-assessment indicated its sustained dedication to advancing safety culture. In 2021, SDG&E indicated in its management self-assessment that it was at the highest level of maturity for 9 of the 22 questions; in 2022, for 15 of the 22 questions; in 2023, for 21 of the 22 questions. SDG&E reports a goal of reaching the highest level of maturity for all questions in 2024.

SDG&E reported the most progress in the safety enabling systems category of the management self-assessment, advancing in maturity in its response to four of the nine questions in this category, and expecting future advancement in a fifth question. Three of



the four questions where SDG&E reported progress were in relation to investigations using root cause analysis, quality of event investigations, and the handling of investigations. Regarding its root cause analysis investigations, SDG&E reported that its Ignition Management Program tracks both ignitions and potential ignitions and performs on-site and follow-up analysis including subject matter expert groups to detect correlations. Regarding the quality of event investigations, SDG&E reported that, in addition to its regular investigation review meetings and After-Action/Improvement Planning Report process, the Ignition Management Program has developed a process for reporting evidence of heat events. Regarding the handling of investigations, in 2022 SDG&E reported that it was evaluating whether the After-Action Report program could be aligned and integrated with SDG&E's Safety Management System, and in 2023 SDG&E reported that it had accomplished this alignment and integration.

SDG&E's improvements in safety culture were supported by worker feedback through the 2023 workforce survey and focus group. This feedback showed that workers recognize the organization's commitment to safety and see evidence of that commitment, particularly in overall culture. Workforce survey results showed improvement overall and across the two survey statement categories of personal safety and overall culture. Scores for all 30 survey statements were higher compared to the baseline year of 2021 (with an average increase of 0.13), an achievement unique to SDG&E among electrical corporations participating in the workforce survey.

Three of the five highest-scoring survey statements in 2023 were in the wildfire safety category:

- "Protecting the community from wildfire hazards is clearly a high priority with management." (Average score: 4.65.)
- "I feel comfortable discussing wildfire hazards with my supervisor." (Average score: 4.56.)
- "Wildfire and personal safety concerns are communicated openly." (Average

score: 4.51.)

The other highest scoring survey statements in 2023 were in the personal safety category:

- “I take responsibility for the safety of myself and others in my work area.” (Average score: 4.70.)
- “Pausing work for hazards and safety concerns is viewed positively.” (Average score: 4.51.)

Further, the two survey statements that show the greatest improvement from 2022 to 2023 were in the overall culture category:

- “I believe managers apply the same rules for all workers.” (Average score: 4.16 compared to 4.04 in 2022.)
- “The company cares about my opinion.” (Average score: 4.05 compared to 3.94 in 2022.)

Some words focus group participants used to describe the safety culture at SDG&E included passion, transparency, trust, accountability, teamwork, and radical candor.

## **2.2.2 Positive Relationship with Contractors**

SDG&E appears to have cultivated a positive relationship with its wildfire mitigation contractors. Employees in the workforce focus group described SDG&E’s relationship with contractors positively. One participant reported that after an onboarding safety training for contractors was introduced, he witnessed a reduction in contractor safety issues that had been evident in 2022.

The focus group participants’ feedback supported the 2023 workforce survey results. As in 2022, the 2023 survey showed alignment between contractor and employee perceptions, with all respondents indicating similar strengths and opportunities within SDG&E’s safety

culture. This may indicate that SDG&E's safety culture is consistently promulgated across wildfire mitigation work groups, including contractors. Contractors provided higher scores compared to full-time employees in 2023 on all survey statements. Notably, the statement that contractors provided the highest score to in 2023 was "Protecting the community from wildfire hazards is clearly a high priority with management." The overall average workforce survey response score for contractors was 4.43, 0.11 higher than the average score for full-time employees.

### 2.2.3 Prioritization of Worker Safety

The workforce focus group participants indicated that SDG&E prioritizes the safety of its workers by providing them with support for maintaining safety in interactions with the public. One participant reported "we have ongoing issues, but [...] if we need to bring corporate security or the sheriff, we have those options."

The focus group feedback supported some of the safety culture strengths indicated by the workforce survey. Over 92 percent of survey respondents agreed with the statement "Pausing work for hazards and safety concerns is viewed positively," with 61 percent indicating strong agreement with this statement. Similarly, 90 percent of survey respondents agreed with the statement "People have the ability to respond to and correct problems and errors before they get out of control." These statements are indicative of a safety culture that takes concerns reported in the field seriously and empowers workers to respond to problems, even if that means walking away from a job.

## 2.3 Opportunities

SDG&E has several areas where it can continue to strengthen its safety culture. The following section describes the areas where SDG&E should prioritize improving its safety culture. Specific recommendations are described in Section 3.

### 2.3.1 Performance Pressure and Distractions

Although focus group participants described a strong safety culture at SDG&E, they also described instances where shortcuts were taken due to workers feeling rushed. The participants talked about sometimes being overwhelmed by the workload, leading to complacency—a sense that “this won’t happen to me”—and not always taking the time to get the proper tool for a job. This supports the workforce survey result where respondents in all three survey years gave the lowest score in the personal safety category to the statement “People focus on one task at a time and avoid distractions.” Since 2022, this statement also had the greatest decline in score of the statements in the personal safety category. In this category this statement also had the highest percentage of “neutral” responses, at 21 percent, and the highest rate of disagreement, at 9 percent. This may indicate that workers are multi-tasking to meet production goals. SDG&E should continue efforts to alleviate feelings of pressure to perform among frontline employees, which may help promote more focused and safe behavior.

Additionally, there is a notable trend in the workforce survey responses across all three large IOUs (PG&E, SCE, and SDG&E) for all three years (2021, 2022, and 2023) wherein the lowest-ranked categories of employees (in the case of SDG&E, “individual contributor”) gave lower scores than the other categories of employees, with the scores trending higher with increased rank and the highest-ranked employees giving the highest scores. The overall average score for all years for SDG&E’s lowest-ranked categories of employees is 4.25 out of 5, with 5 indicating the highest opinion of the organization’s performance, while the highest-ranked category has an average score of 4.64 out of 5, a difference of 0.39. This may indicate a lack of understanding of frontline safety culture challenges at the top of the organization and an associated opportunity for building SDG&E’s capacity as a learning organization through feedback mechanisms like.

See the corresponding recommendation in Section 3.1 of this report.

## 2.3.2 Safety Event Reporting

In the management-self assessment, SDG&E outlined its focus on preventative safety measures including conducting root cause analysis on near misses, tracking ignitions and potential ignitions through the Ignition Management Program (IMP), and holding monthly Safety Incident Review meetings. Still, SDG&E identified opportunities to increase the maturity of safety event reporting including near-miss reporting as a focus for 12-month and 3-year objectives. Additionally, in its 2022 management self-assessment's summary plan for 2023, SDG&E identified actions associated with addressing issues with the IMP, including issues with gathering data and getting proper notification from events in the field. It is not clear from SDG&E's 2023 management self-assessment the degree to which these issues have been resolved.

The 2023 workforce survey results support the conclusion that opportunity exists for SDG&E to improve near-miss reporting. One of the lowest-scoring statements on the survey was "People report mistakes they make, even if others do not notice them." While the average score for this statement has improved with every survey, this statement had the highest rate of "neutral" responses in the overall culture category, at 21 percent, and a relatively high rate of disagreement, at 5 percent. This has consistently been one of the lowest-scoring statements in each workforce survey since 2021.<sup>18,19</sup>

Additionally, SDG&E should do more to encourage frontline workers to report wildfire hazards. Scores for the nine workforce survey statements concerning wildfire safety slightly decreased from 2022 (with an average decrease of 0.07), with the statement "I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address

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<sup>18</sup> The three statements that have consistently scored the lowest on SDG&E's workforce survey since 2021 are: "People report mistakes they make, even if others do not notice them" (three-year average score: 3.89); "People focus on one task at a time and avoid distractions" (three-year average score: 3.85); and "I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them" (three-year average score: 3.65).

<sup>19</sup> Notably, the statement "People report mistakes they make, even if others do not notice them" has been one of the four lowest-scoring statements in all three years of the survey for all three large IOUs. In 2023 the three overall average scores for this statement were 3.98 for SDG&E, 3.94 for PG&E, and 3.73 for SCE.

them” decreasing the most (with an average decrease of 0.11). This has been one of the three lowest-scoring statements for SDG&E’s workforce survey since 2021.

Through its 2023 SCA inputs, SDG&E identified an encouraging trend in its near-miss reporting metrics. SDG&E noted an increase in the overall number of near misses reported and, in 2021 and 2022, an increase in non-anonymous reporting.<sup>20, 21</sup> Workers including their names on near-miss reports may indicate that they believe their input is valued and they feel safe to provide feedback without risk of retaliation. SDG&E should continue improving its near-miss reporting, aiming to increase the number of near-miss reports where the worker feels safe to include personally identifying details, facilitating appropriate follow-up actions. See the corresponding recommendation in Section 3.2 of this report.

### 2.3.3 Risk from Interactions with the Public

Although focus group participants suggested that frontline workers feel empowered to walk away from potential escalations in interactions with the public in the field, they agreed that threats from the public remain a constant concern, particularly in vegetation management work.

Reducing customer touchpoints and improving communication with customers when multiple touchpoints are necessary in a short time span could reduce the threat posed to the workforce from the public. SDG&E’s report on the related 2022 recommendation refers to the recent establishment of a Field Service Delivery organization to streamline and optimize operations in the field, which should help field workers avoid duplication or multiple visits to the same site.<sup>22</sup> However, the risk posed by hostile interactions with the

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<sup>20</sup> In its 2022 management self-assessment, SDG&E reported “recently more employees are including their name [with near-miss reports] to assist with proper follow up,” and, in its 2023 management self-assessment, SDG&E reported “[year-to-date], through June 30, 2023, 42% of employee-reported Near Miss Reports are submitted non-anonymously.”

<sup>21</sup> [SDG&E’s 2021 Safety Culture Assessment \(Sept. 2021\)](https://energysafety.ca.gov/wp-content/uploads/2021-sca-report-sdge.pdf) (https://energysafety.ca.gov/wp-content/uploads/2021-sca-report-sdge.pdf, accessed Sept. 28, 2023).

<sup>22</sup> See Section 5, 2022 Recommendations, response to “Mitigate Risk Exposure Posed by Interactions with the Public” for more information.



public remains a significant safety concern for SDG&E's frontline workers.

See the corresponding recommendation in Section 3.3 of this report.

### **2.3.4 Engagement in Workforce Survey**

SDG&E's workforce survey return was much lower in 2023 than it has been thus far. The employee response rate went down from 87 percent in 2022 to 63 percent in 2023.

See the corresponding recommendation in Section 3.4 of this report.

## 3 Recommendations

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Culture change takes time, dedication, and starts with understanding where a company is on its organizational safety journey and the underlying drivers influencing the workforce. The recommendations in this report are based on observations from SDG&E's 2023 SCA inputs: a management self-assessment with a summary plan for 2024; safety culture objectives; lessons learned; progress on 2022 recommendations; a workforce survey; and the follow-up interviews that gave context and clarity to the management self-assessment and workforce survey. Most of the recommendations included here build on recommendations from SDG&E's 2022 SCA report;<sup>23, 24</sup> one is newly introduced based on SDG&E's 2023 assessment.

Recommendations for SDG&E are outlined below and structured as follows: overall theme of the recommendation; observations from the SCA inputs contributing to the recommendation; goals of the recommendation; and verification method.

### 3.1 Reduce Perceived Pressure to Perform and Distractions

SDG&E should continue to develop and implement actions to reduce perceived pressures to perform and distractions. When frontline workers perceive their work as overwhelming and requiring multitasking, they might take shortcuts and be distracted. Leaders at SDG&E should consistently demonstrate to workers that safety is the top priority through words, decision-making, and actions, especially as it pertains to distractions and perceived pressures to perform.

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<sup>23</sup> [SDG&E's 2022 Safety Culture Assessment \(May 2023\)](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53798&shareable=true)

(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53798&shareable=true>, accessed Sept. 28, 2023).

<sup>24</sup> Due to a short reporting period for the 2023 SCA reports, the electrical corporation had limited time to make progress on the 2022 recommendations. Therefore, the 2022 recommendations are continued herein.



SDG&E should also continue to implement measures to increase organizational learning through regular cross-departmental topic-specific safety listening sessions. These actions should help leadership gain a better understanding of frontline issues and provide an opportunity to recognize workers' accomplishments.

### 3.1.1 Observations

Workforce focus group participants described instances where shortcuts were taken. Reasons given included workers feeling rushed and complacency stemming from an overwhelming workload. One participant noted that sometimes workers do not take the time to get the proper tool for a job.

One of SDG&E's lowest-scored workforce survey statements for all three survey years is "People focus on one task at a time and avoid distractions."

There is a trend in the workforce survey responses wherein the lowest-ranked categories of employees give lower scores than the other categories of employees, with the scores trending higher with increased rank and the highest-ranked employees giving the highest scores. As noted above in Section 1.2.2.1, the statements are framed in a positive light (e.g., "managers treat workers with respect"), so greater agreement—and an associated higher score—indicates a better opinion of the organization's performance.

### 3.1.2 Goals of Recommendation

The goal of this recommendation is to ensure that SDG&E's workers feel safe to take the time they need to focus on one task at a time and avoid distractions and also to speak up if they feel performance might be prioritized over safety.

### 3.1.3 Verification Method

In its 2024 SCA management self-assessment, SDG&E must provide detailed descriptions of the actions leadership is taking to reduce perceived pressure to perform and

distractions. This includes the continued use and promotion of the formalized “Stop Work Authority Process” to empower workers to stop a job or task if they feel it is not safe to proceed.

SDG&E’s continued progress should be reflected in future workforce surveys in scores on statements in the personal safety category, including “People focus on one task at a time and avoid distractions.” Progress should also be evident during future workforce focus groups in participant responses when asked to describe SDG&E’s safety culture.

### 3.2 Build on Efforts to Track Trends in Safety Event Reporting and Learn from Them

A culture of learning is key to improving safety operations: tracking trends in safety events contributes to learning. SDG&E should continue to build on its efforts to track trends in safety event-related reporting, specifically tracking the quality of near-miss investigations and continuing to improve its Ignition Management Program.

SDG&E has taken steps to gather more near-miss event information. In its 2022 and 2023 management self-assessment, SDG&E included a three-year objective to review all incidents, including near misses with the intent to identify those with high serious injury or fatality (SIF) potential and take preventative actions. To achieve this outcome, SDG&E should continue to focus on tracking trends in near-miss identification, reporting, and investigation.

SDG&E’s observed increase in non-anonymous reporting is an indication of advancing safety culture and of psychological safety (i.e., a sense of safety that allows workers to feel empowered to speak up).<sup>25</sup> SDG&E should build on this trend.

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<sup>25</sup> A “psychologically safe work environment” is “one in which employees feel safe to voice ideas, willingly seek feedback, provide honest feedback, collaborate, take risks and experiment” ([Psychological safety: A systematic review of the literature](#), Newman, Donohue, and Eva [2017] [<https://www.sciencedirect.com/science/article/pii/S1053482217300013>, accessed Oct. 27, 2023]).

### 3.2.1 Observations

In 2022, SDG&E noted Ignition Management Program (IMP) issues that may or may not be resolved based on its 2023 management self-assessment. The IMP tracks ignitions and potential ignitions, performing a root cause analysis on each ignition to detect correlations, and in 2022 SDG&E reported, regarding its IMP, “[w]e are still working through the issues with gathering data and getting proper notification from the events that are occurring in the field.”<sup>26</sup> The only update regarding improvements to the IMP in the 2023 management self-assessment indicates that the program “has developed a process for reporting evidence of heat events.”<sup>27</sup>

Two of the lowest-scoring statements on SDG&E’s workforce survey were “People report mistakes they make, even if others do not notice them” and “I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them”—among the lowest-scoring statements on each of SDG&E’s workforce surveys since 2021.

SDG&E has observed a trend in more near-miss reports and more of these reports being non-anonymous.

### 3.2.2 Goals of Recommendation

The goal of this recommendation is for SDG&E to focus on tracking near-miss reporting trends and learn from them to continually improve safety culture and increase the organization’s capacity for psychological safety.

### 3.2.3 Verification Method

In its 2024 SCA management self-assessment, SDG&E must report on the trends in the

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<sup>26</sup> [SDG&E’s 2022 Safety Culture Assessment \(May 2023\)](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53798&shareable=true), Summary Plan for 2023 item A2 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53798&shareable=true, accessed Sept. 28, 2023).

<sup>27</sup> See Section 5, 2023 Management Self-Assessment and Justification, 3.1.2 “Rate the quality of event investigations.”

number of near-miss reports submitted anonymously compared to non-anonymously. Additionally, SDG&E must provide an update on its Ignition Management Program.

Continued progress should be evident on future workforce surveys through an increase in agreement with the statement “People report mistakes they make, even if others do not notice them.”

### 3.3 Mitigate Risk Exposure Posed by Interactions with the Public

SDG&E should continue to recognize and take action to mitigate the risk exposure posed by interactions with the public.

Although workforce focus group participants have indicated that they feel supported in walking away from jobs where interactions with the public pose threats to the crew, the risk remains a significant safety concern for SDG&E workers. SDG&E should further reduce frontline worker exposure to potentially threatening interactions with the public and better prepare workers to handle these situations.

SDG&E can continue to mitigate this risk by focusing on timely customer communication, in particular communication about activities requiring multiple visits to the same property. SDG&E should continue to combine visits whenever possible. In addition, SDG&E should continue to assist frontline workers in their ability to handle negative interactions with the public by:

- Improving communication with work crews by providing them with pertinent information about previous incidents at specific job sites and accurate contact information for the owners and inhabitants of properties they are visiting.
- Providing further conflict resolution training to employees.

Conflict with the public is not only a problem for worker safety and morale, but could meaningfully hamper wildfire mitigation activities, such as through property owners

refusing work crews access to property where hazardous vegetation poses a wildfire threat.

### **3.3.1 Observation**

Focus group participants indicated that threats from the public remain a constant concern, particularly in vegetation management work.

### **3.3.2 Goal of Recommendation**

The goal of this recommendation is to reduce the risk exposure to the workforce posed by interactions with the public.

### **3.3.3 Verification Method**

In its 2024 SCA management self-assessment, SDG&E must provide a description of its progress on reducing hostile interactions with the public. SDG&E must also provide:

1. Information on the tracking and monitoring of hostile customer interactions and external threats.
2. Details on how this information is communicated to crews (e.g., making information from the access protocol list available) and used to influence the approach to job sites where the potential for conflict is identified.
3. An update on SDG&E's progress reducing the number of touchpoints or multiple visits to the same location using its new Field Service Delivery organization.
4. Information on outcomes from training programs aimed at reducing conflict with the public.

## **3.4 Increase Engagement in Workforce Survey**

### **3.4.1 Observation**

The workforce survey response rate was low relative to SDG&E's rate in previous years.



In the future, SDG&E must employ a more robust communication strategy that involves senior leadership to promote the survey. It must consider ways to diversify the tactics for soliciting survey responses from the workforce.

### **3.4.2 Goal of Recommendation**

The goal of this recommendation is to improve engagement in next year's workforce survey.

### **3.4.3 Verification Method**

SDG&E must demonstrate an increased workforce survey response rate in 2024. The goal should be to always improve on the previous year's response rate.



## 4 Conclusion

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This report provides the findings and recommendations from SDG&E’s 2023 SCA, its third under Public Utilities Code section 8389(d)(4). 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 opportunities in designing and implementing a strong safety culture. As stated above, Energy Safety ultimately seeks to assess safety culture outcomes over time and incorporate continuous learning into the SCA process.



## 5 Data Attachments

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# 5.1 Workforce Survey Results

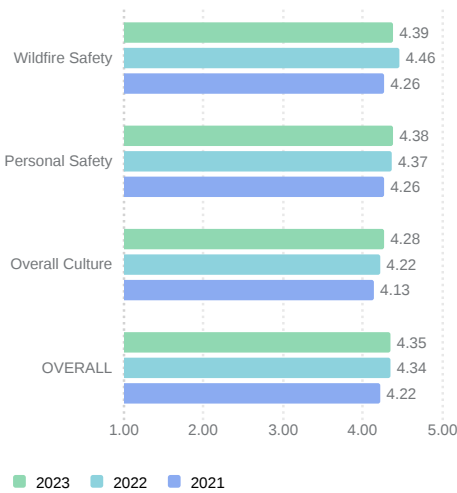


## Energy Safety Workforce Survey 2023: Overall Results and 30 Standard Statements

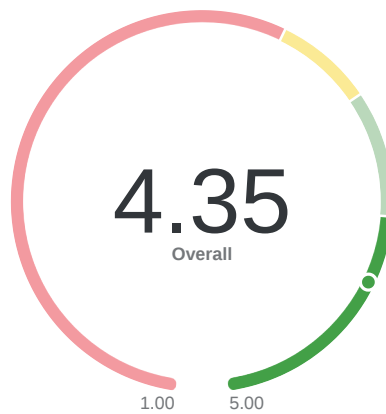
This page contains average response scores and percent distributions of response categories for the overall survey.

**Average Response Score Metrics:** Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)  
**Response Categories:** Strongly Disagree = 1 (Red), Disagree = 2 (Orange), Neutral = 3 (Yellow), Agree = 4 (Light Green), Strongly Agree = 5 (Dark Green)

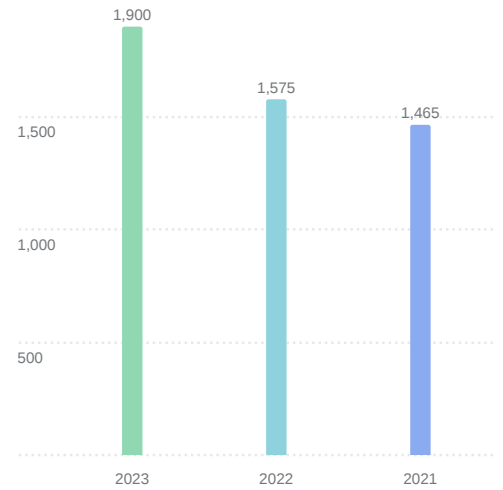
Average Response Scores



Average Response Score 2023



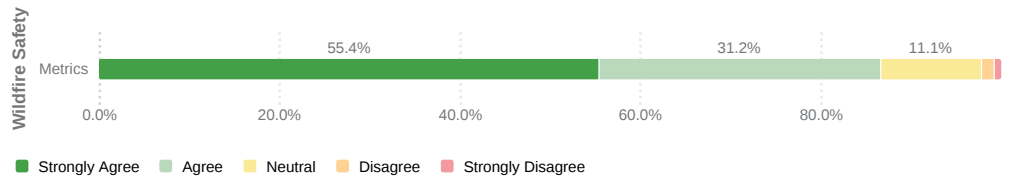
Response Count 4,940



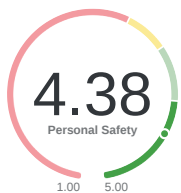
Wildfire Safety 2023



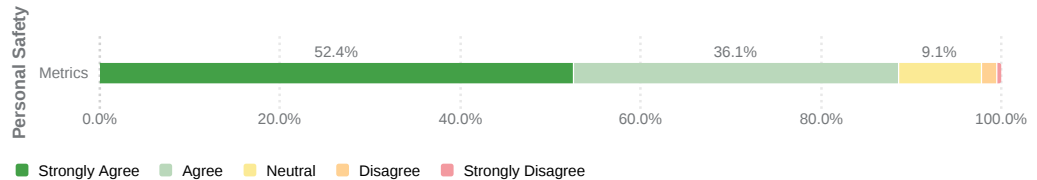
Percent Distributions 2023



Personal Safety 2023



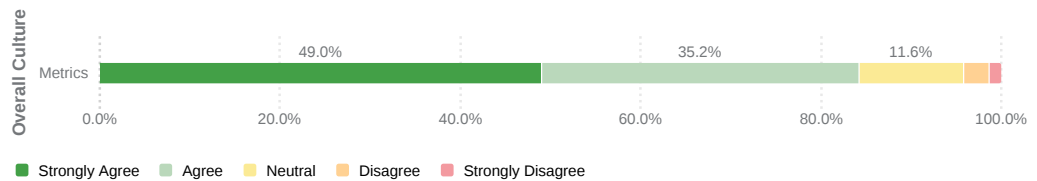
Percent Distributions 2023



Overall Culture 2023



Percent Distributions 2023



## Energy Safety Workforce Survey 2023: Overall Results and 30 Standard Statements

Comparisons were not computed for groups with fewer than five respondents.

**Average Response Score Metrics:** Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)  
**Change Score Metrics:** Increase in Score: > 0 (Blue), Decrease in Score: < 0 (Red), No Change in Score: = 0 (Gray)

### Overall Average Response Scores by Statement

Wildfire Safety	2023	2022	2021	Change 2022-2023 ▼	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Our management acts quickly to address wildfire hazards	4.50	4.53	4.42	-0.030	61%	30%	9%	1%	0%
Protecting the community from wildfire hazards is clearly a high priority with management	4.65	4.69	4.59	-0.039	72%	23%	5%	0%	0%
People in my workgroup report all wildfire hazards, no matter how minor	4.35	4.40	4.13	-0.051	52%	33%	14%	1%	0%
People look for wildfire hazards and risks as work progresses	4.37	4.44	4.25	-0.066	51%	37%	11%	1%	0%
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.49	4.56	4.47	-0.073	58%	35%	7%	0%	0%
I feel comfortable discussing wildfire hazards with my supervisor	4.56	4.63	4.45	-0.077	65%	28%	6%	1%	1%
Wildfire and personal safety concerns are communicated openly	4.51	4.59	4.38	-0.085	61%	31%	7%	1%	0%
Leaders actively seek out signs of potential wildfire hazards	4.37	4.46	4.22	-0.096	52%	35%	12%	1%	1%
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.70	3.80	3.45	-0.105	28%	30%	31%	8%	4%

### Overall Average Response Scores by Statement

Personal Safety	2023	2022	2021	Change 2022-2023 ▼	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
People have the skills they need to resolve workplace safety issues	4.35	4.25	4.25	0.096	48%	42%	8%	2%	0%
We have the right tools for the job	4.31	4.27	4.18	0.044	48%	39%	10%	2%	1%
Leaders keep people prepared to intervene when an emergency occurs	4.38	4.34	4.29	0.036	50%	39%	9%	1%	1%
People have the ability to respond to and correct problems and errors before they get out of control	4.37	4.34	4.15	0.024	49%	41%	8%	1%	0%
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.41	4.39	4.34	0.024	56%	33%	9%	1%	1%
Leaders use mistakes and incidents as learning opportunities	4.40	4.39	4.31	0.013	53%	38%	8%	1%	1%
I take responsibility for the safety of myself and others in my work area	4.70	4.69	4.60	0.006	73%	24%	3%	0%	0%
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.35	4.36	4.20	-0.003	48%	40%	10%	1%	0%
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.50	4.51	4.40	-0.013	61%	30%	8%	1%	1%
Pausing work for hazards and safety concerns is viewed positively	4.51	4.53	4.47	-0.021	61%	31%	6%	1%	0%
People focus on one task at a time and avoid distractions	3.90	3.95	3.71	-0.048	29%	41%	21%	8%	1%

Overall Results and 30 Standard Statement analysis continued on the next page.

## Overall Average Response Scores by Statement

Overall Culture	2023	2022	2021	Change 2022-2023 ▼	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
I believe managers apply the same rules for all workers	4.16	4.04	3.88	0.125	47%	32%	13%	5%	3%
The company cares about my opinions	4.05	3.94	3.81	0.110	39%	36%	17%	4%	3%
People in my workgroup treat each other with respect	4.43	4.35	4.41	0.079	57%	32%	7%	2%	1%
People report mistakes they make, even if others do not notice them	3.98	3.92	3.76	0.062	32%	41%	21%	4%	1%
My supervisor makes sure all employee concerns are heard before job decisions are made	4.31	4.25	4.13	0.061	50%	35%	11%	3%	1%
Managers treat workers with respect	4.41	4.35	4.27	0.051	56%	33%	9%	1%	1%
My supervisor would use whatever power they have to help me out	4.45	4.40	4.40	0.046	59%	30%	8%	2%	1%
Information about important events and lessons learned is shared within my workgroup	4.40	4.36	4.30	0.045	54%	36%	8%	2%	1%
People listen to one another: it is rare that someone's views go unheard	4.17	4.17	4.01	0.004	41%	42%	13%	3%	1%
Leaders encourage people to ask questions	4.40	4.40	4.36	0.004	55%	35%	8%	2%	1%

# Energy Safety Workforce Survey 2023: Demographic Comparisons

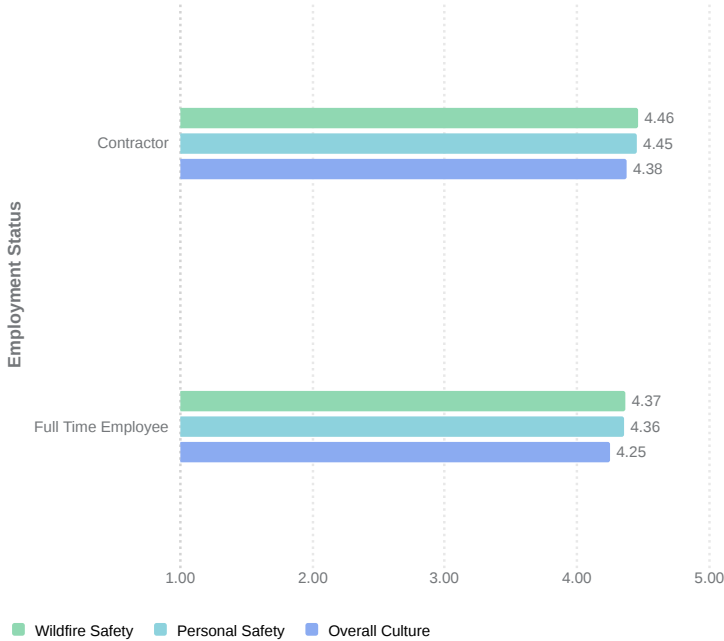
Survey respondents were asked to provide demographic information at the conclusion of the **Energy Safety Workforce Survey**. These responses were used to conduct analyses and provide these subgroup comparisons.

Comparisons were not computed for groups with fewer than five respondents.

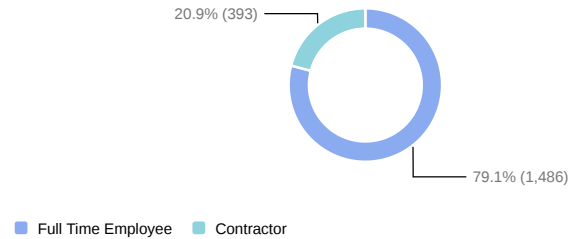
Average Response Score Metrics: Low: < 3.30, Medium: 3.30 - 3.65, Moderately High: 3.65 - 4.10, High: 4.10 +

## 1. Comparison by Employment Status

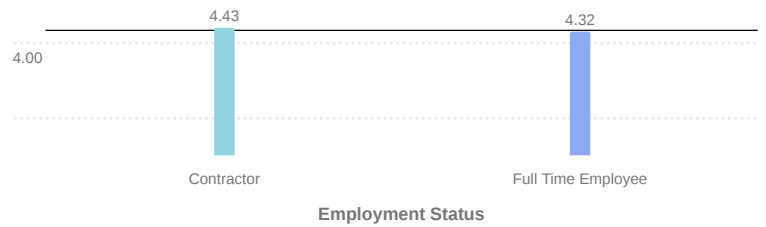
Average Response Scores by Statement Category



Number of Responses 1,879



Overall Average Response Score



Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)

### Average Response Scores by Statement

Wildfire Safety	Contractor	Full Time Employee
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.76	3.68
I feel comfortable discussing wildfire hazards with my supervisor	4.65	4.53
Leaders actively seek out signs of potential wildfire hazards	4.44	4.34
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.55	4.47
Our management acts quickly to address wildfire hazards	4.55	4.48
People in my workgroup report all wildfire hazards, no matter how minor	4.44	4.33
People look for wildfire hazards and risks as work progresses	4.46	4.35
Protecting the community from wildfire hazards is clearly a high priority with management	4.70	4.64
Wildfire and personal safety concerns are communicated openly	4.58	4.49

### Average Response Scores by Statement

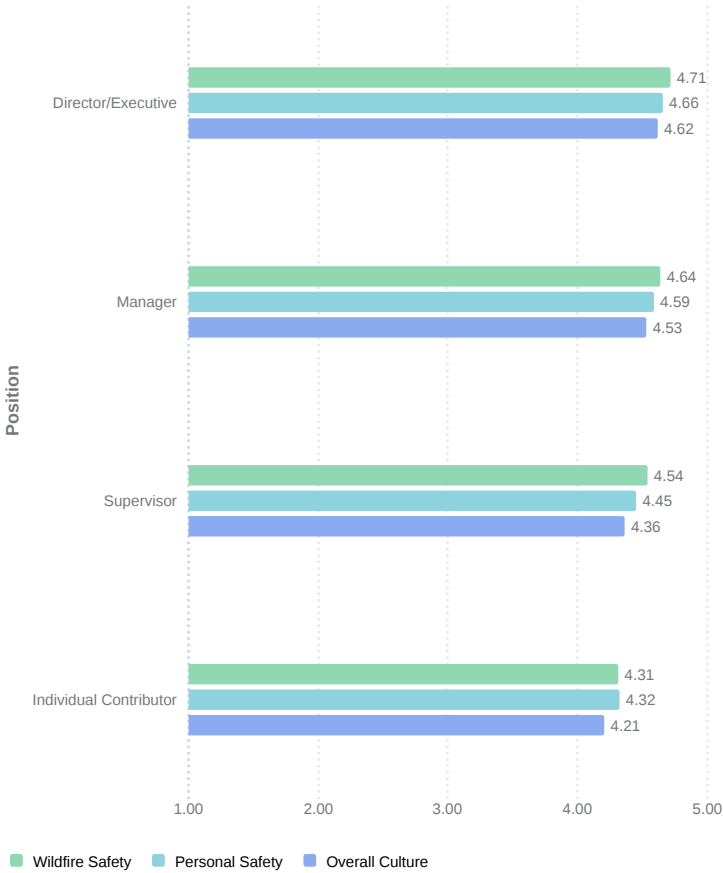
Personal Safety	Contractor	Full Time Employee
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.52	4.38
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.41	4.34
I take responsibility for the safety of myself and others in my work area	4.71	4.69
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.56	4.48
Leaders keep people prepared to intervene when an emergency occurs	4.46	4.36
Leaders use mistakes and incidents as learning opportunities	4.49	4.38
Pausing work for hazards and safety concerns is viewed positively	4.57	4.49
People focus on one task at a time and avoid distractions	3.99	3.88
People have the ability to respond to and correct problems and errors before they get out of control	4.44	4.35
People have the skills they need to resolve workplace safety issues	4.42	4.33
We have the right tools for the job	4.43	4.28

### Average Response Scores by Statement

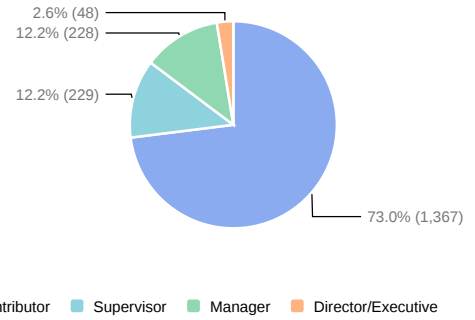
Overall Culture	Contractor	Full Time Employee
I believe managers apply the same rules for all workers	4.32	4.12
Information about important events and lessons learned is shared within my workgroup	4.49	4.38
Leaders encourage people to ask questions	4.48	4.38
Managers treat workers with respect	4.50	4.38
My supervisor makes sure all employee concerns are heard before job decisions are made	4.37	4.29
My supervisor would use whatever power they have to help me out	4.52	4.42
People in my workgroup treat each other with respect	4.59	4.38
People listen to one another: it is rare that someone's views go unheard	4.32	4.13
People report mistakes they make, even if others do not notice them	4.05	3.95
The company cares about my opinions	4.16	4.02

## 2. Comparison by Position

Average Response Scores by Statement Category



Number of Responses 1,872



Overall Average Response Score



Comparisons were not computed for groups with fewer than five respondents.  
**Average Response Score Metrics:** Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)

Average Response Scores by Statement

Wildfire Safety	Director/Executive	Individual Contributor	Manager	Supervisor
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	4.27	3.56	4.11	3.99
I feel comfortable discussing wildfire hazards with my supervisor	4.85	4.50	4.78	4.64
Leaders actively seek out signs of potential wildfire hazards	4.81	4.28	4.62	4.54
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.66	4.43	4.68	4.60
Our management acts quickly to address wildfire hazards	4.81	4.42	4.74	4.63
People in my workgroup report all wildfire hazards, no matter how minor	4.65	4.26	4.64	4.55
People look for wildfire hazards and risks as work progresses	4.63	4.30	4.67	4.50
Protecting the community from wildfire hazards is clearly a high priority with management	4.94	4.60	4.84	4.76
Wildfire and personal safety concerns are communicated openly	4.81	4.45	4.69	4.66

Average Response Scores by Statement

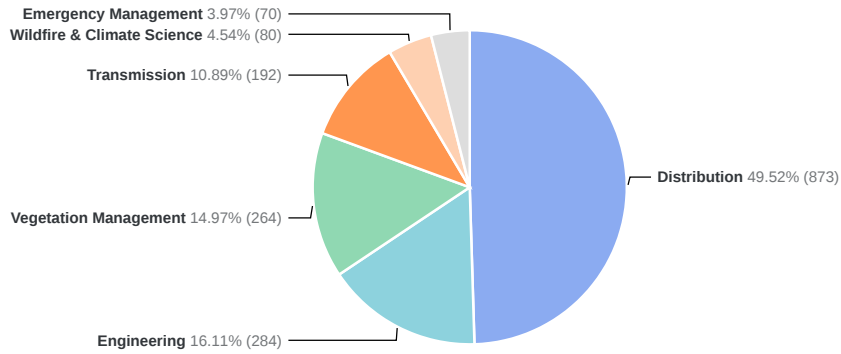
Personal Safety	Director/Executive	Individual Contributor	Manager	Supervisor
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.69	4.34	4.67	4.53
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.67	4.30	4.56	4.44
I take responsibility for the safety of myself and others in my work area	4.88	4.66	4.82	4.76
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.77	4.45	4.72	4.57
Leaders keep people prepared to intervene when an emergency occurs	4.75	4.31	4.61	4.47
Leaders use mistakes and incidents as learning opportunities	4.69	4.35	4.66	4.45
Pausing work for hazards and safety concerns is viewed positively	4.69	4.45	4.70	4.62
People focus on one task at a time and avoid distractions	4.17	3.86	4.11	3.88
People have the ability to respond to and correct problems and errors before they get out of control	4.58	4.32	4.56	4.43
People have the skills they need to resolve workplace safety issues	4.66	4.30	4.57	4.38
We have the right tools for the job	4.75	4.23	4.55	4.47

Average Response Scores by Statement

Overall Culture	Director/Executive	Individual Contributor	Manager	Supervisor
I believe managers apply the same rules for all workers	4.63	4.07	4.50	4.26
Information about important events and lessons learned is shared within my workgroup	4.58	4.35	4.62	4.49
Leaders encourage people to ask questions	4.67	4.34	4.62	4.51
Managers treat workers with respect	4.75	4.34	4.67	4.48
My supervisor makes sure all employee concerns are heard before job decisions are made	4.69	4.24	4.52	4.40
My supervisor would use whatever power they have to help me out	4.69	4.39	4.68	4.51
People in my workgroup treat each other with respect	4.69	4.35	4.68	4.53
People listen to one another: it is rare that someone's views go unheard	4.63	4.11	4.40	4.24
People report mistakes they make, even if others do not notice them	4.35	3.91	4.21	4.03
The company cares about my opinions	4.53	3.96	4.38	4.15

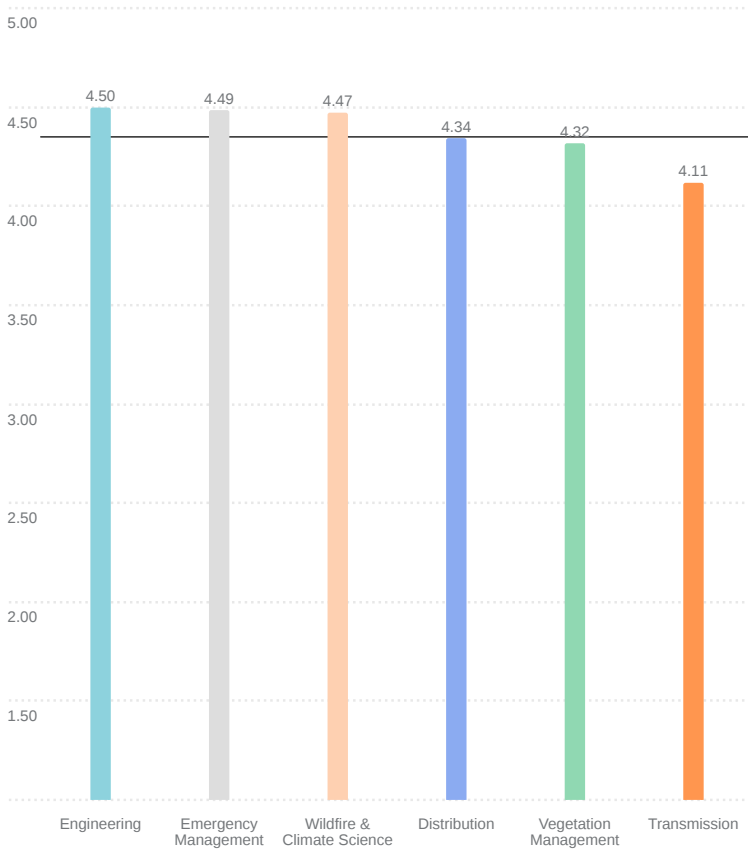
### 3. Comparison by Business Unit

Number of Responses 1,763

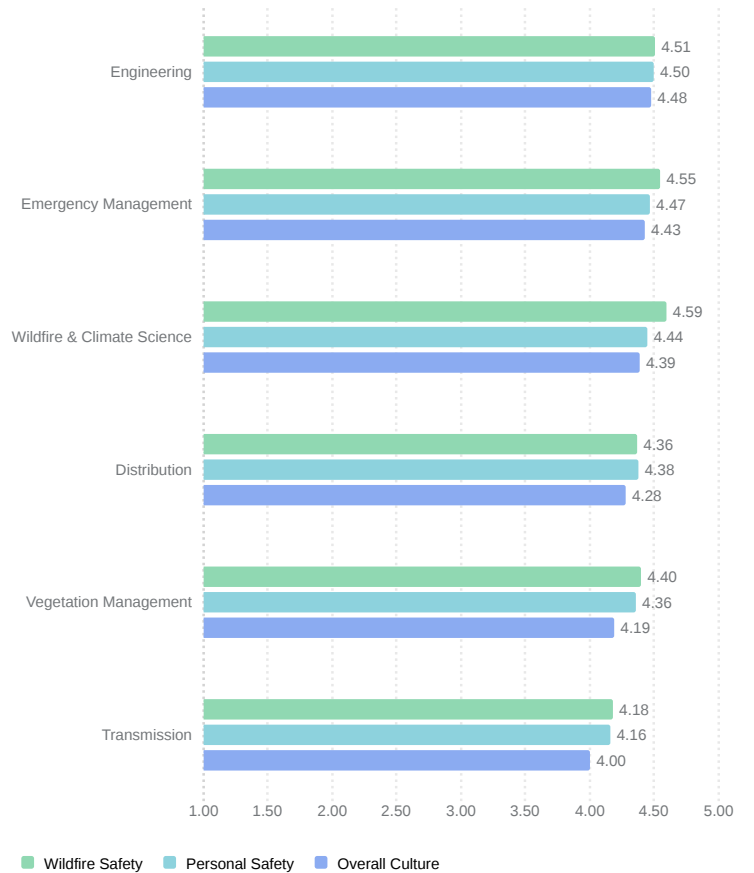


■ Distribution ■ Engineering ■ Vegetation Management ■ Transmission ■ Wildfire & Climate Science ■ Emergency Management

Overall Average Response Score



Average Response Scores by Statement Category



■ Wildfire Safety ■ Personal Safety ■ Overall Culture



Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)

Average Response Scores by Statement

Wildfire Safety	Distribution	Emergency Management	Engineering	Transmission	Vegetation Management	Wildfire & Climate Science
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.63	3.97	3.79	3.55	3.84	4.15
I feel comfortable discussing wildfire hazards with my supervisor	4.54	4.74	4.69	4.32	4.49	4.76
Leaders actively seek out signs of potential wildfire hazards	4.32	4.57	4.49	4.13	4.44	4.60
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.47	4.68	4.59	4.25	4.48	4.60
Our management acts quickly to address wildfire hazards	4.48	4.66	4.62	4.25	4.49	4.67
People in my workgroup report all wildfire hazards, no matter how minor	4.33	4.46	4.47	4.22	4.35	4.56
People look for wildfire hazards and risks as work progresses	4.35	4.55	4.50	4.17	4.41	4.53
Protecting the community from wildfire hazards is clearly a high priority with management	4.65	4.73	4.75	4.46	4.63	4.79
Wildfire and personal safety concerns are communicated openly	4.49	4.60	4.65	4.26	4.49	4.69

Average Response Scores by Statement

Personal Safety	Distribution	Emergency Management	Engineering	Transmission	Vegetation Management	Wildfire & Climate Science
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.39	4.51	4.60	4.15	4.40	4.58
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.36	4.37	4.39	4.25	4.42	4.27
I take responsibility for the safety of myself and others in my work area	4.71	4.83	4.73	4.56	4.68	4.71
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.52	4.75	4.59	4.23	4.40	4.68
Leaders keep people prepared to intervene when an emergency occurs	4.36	4.54	4.52	4.11	4.36	4.54
Leaders use mistakes and incidents as learning opportunities	4.40	4.53	4.57	4.11	4.36	4.54
Pausing work for hazards and safety concerns is viewed positively	4.50	4.70	4.61	4.31	4.48	4.67
People focus on one task at a time and avoid distractions	3.90	3.90	4.01	3.71	4.04	3.77
People have the ability to respond to and correct problems and errors before they get out of control	4.38	4.49	4.48	4.11	4.34	4.42
People have the skills they need to resolve workplace safety issues	4.35	4.43	4.48	4.12	4.35	4.46
We have the right tools for the job	4.33	4.23	4.54	4.14	4.20	4.24

Comparisons by business unit and response category continued on the next page.

Comparisons were not computed for groups with fewer than five respondents.

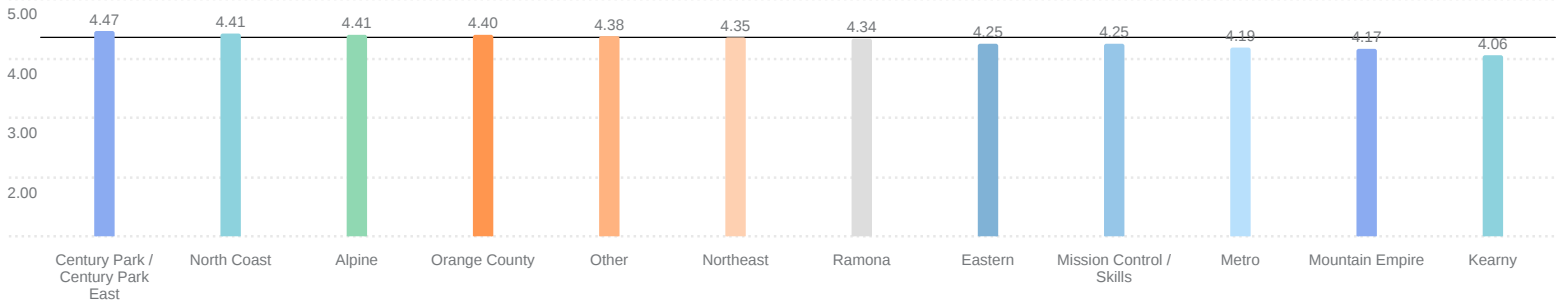
Average Response Score Metrics: Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)

Average Response Scores by Statement

Overall Culture	Distribution	Emergency Management	Engineering	Transmission	Vegetation Management	Wildfire & Climate Science
I believe managers apply the same rules for all workers	4.17	4.31	4.39	3.83	4.09	4.30
Information about important events and lessons learned is shared within my workgroup	4.39	4.65	4.53	4.12	4.44	4.52
Leaders encourage people to ask questions	4.42	4.59	4.57	4.14	4.31	4.46
Managers treat workers with respect	4.41	4.61	4.62	4.17	4.19	4.61
My supervisor makes sure all employee concerns are heard before job decisions are made	4.31	4.49	4.51	4.08	4.23	4.36
My supervisor would use whatever power they have to help me out	4.45	4.66	4.60	4.17	4.39	4.59
People in my workgroup treat each other with respect	4.42	4.54	4.66	4.14	4.33	4.54
People listen to one another: it is rare that someone's views go unheard	4.19	4.17	4.42	3.87	4.10	4.28
People report mistakes they make, even if others do not notice them	3.96	4.14	4.21	3.74	3.94	4.09
The company cares about my opinions	4.05	4.21	4.32	3.77	3.87	4.16

## 4. Comparison by Location

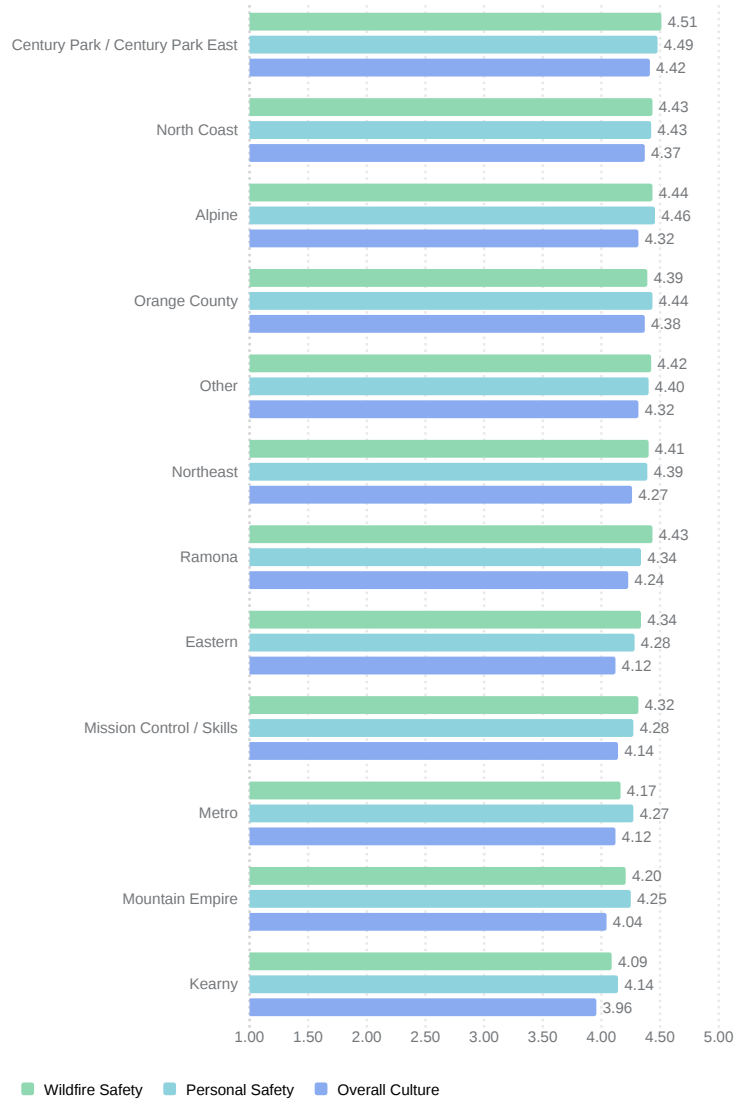
Overall Average Response Score



Number of Responses 1,870

Location	Count	Percent
Alpine	92	5%
Century Park / Century Park East	600	32%
Eastern	83	4%
Kearny	209	11%
Metro	89	5%
Mission Control / Skills	65	3%
Mountain Empire	32	2%
North Coast	72	4%
Northeast	150	8%
Orange County	43	2%
Other	374	20%
Ramona	61	3%

Average Response Scores by Safety Components



Comparisons were not computed for groups with fewer than five respondents.

Average Response Score Metrics: Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)

Average Response Scores by Statement

Wildfire Safety	Alpine	Century Park / Century Park East	Eastern	Kearny	Metro	Mission Control / Skills	Mountain Empire	North Coast	Northeast	Orange County	Other	Ramona
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.65	3.78	3.81	3.34	3.39	3.64	3.53	3.96	3.79	3.76	3.76	3.87
Leaders actively seek out signs of potential wildfire hazards	4.48	4.49	4.35	4.04	4.13	4.26	4.16	4.39	4.37	4.48	4.40	4.46
People in my workgroup report all wildfire hazards, no matter how minor	4.45	4.46	4.33	4.08	4.07	4.32	4.19	4.40	4.37	4.26	4.40	4.42
Our management acts quickly to address wildfire hazards	4.64	4.63	4.40	4.19	4.27	4.46	4.38	4.43	4.54	4.47	4.52	4.48
People look for wildfire hazards and risks as work progresses	4.46	4.48	4.35	4.11	4.18	4.34	4.22	4.46	4.38	4.36	4.39	4.46
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.52	4.63	4.40	4.21	4.31	4.40	4.22	4.49	4.49	4.43	4.52	4.49
I feel comfortable discussing wildfire hazards with my supervisor	4.52	4.71	4.43	4.29	4.33	4.32	4.34	4.58	4.58	4.53	4.60	4.57
Wildfire and personal safety concerns are communicated openly	4.61	4.66	4.41	4.19	4.33	4.48	4.34	4.58	4.52	4.53	4.51	4.48
Protecting the community from wildfire hazards is clearly a high priority with management	4.65	4.78	4.61	4.39	4.51	4.66	4.47	4.61	4.65	4.67	4.68	4.69

Comparisons by location and response category continued on the next page.

Comparisons were not computed for groups with fewer than five respondents.  
**Average Response Score Metrics:** Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)

Average Response Scores by Statement

Personal Safety	Alpine	Century Park / Century Park East	Eastern	Kearny	Metro	Mission Control / Skills	Mountain Empire	North Coast	Northeast	Orange County	Other	Ramona
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.53	4.54	4.23	4.10	4.28	4.34	4.28	4.43	4.40	4.49	4.46	4.30
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.40	4.42	4.35	4.13	4.15	4.28	4.41	4.47	4.41	4.40	4.39	4.36
I take responsibility for the safety of myself and others in my work area	4.73	4.77	4.66	4.59	4.58	4.74	4.59	4.68	4.75	4.63	4.68	4.61
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.55	4.64	4.35	4.24	4.42	4.48	4.34	4.44	4.46	4.56	4.53	4.44
Leaders keep people prepared to intervene when an emergency occurs	4.43	4.52	4.28	4.06	4.25	4.22	4.19	4.44	4.38	4.53	4.39	4.43
Leaders use mistakes and incidents as learning opportunities	4.50	4.55	4.24	4.14	4.34	4.29	4.31	4.36	4.36	4.51	4.41	4.38
Pausing work for hazards and safety concerns is viewed positively	4.55	4.66	4.42	4.25	4.51	4.46	4.31	4.54	4.47	4.58	4.50	4.30
People focus on one task at a time and avoid distractions	4.14	3.88	3.96	3.73	3.85	3.69	3.88	4.07	4.06	3.95	3.90	4.02
People have the ability to respond to and correct problems and errors before they get out of control	4.48	4.47	4.25	4.13	4.25	4.23	4.19	4.44	4.36	4.40	4.40	4.37
People have the skills they need to resolve workplace safety issues	4.45	4.47	4.22	4.08	4.24	4.15	4.10	4.42	4.38	4.40	4.39	4.30
We have the right tools for the job	4.35	4.42	4.16	4.09	4.13	4.18	4.13	4.44	4.25	4.33	4.38	4.30

Comparisons by location and response category continued on the next page.

Comparisons were not computed for groups with fewer than five respondents.

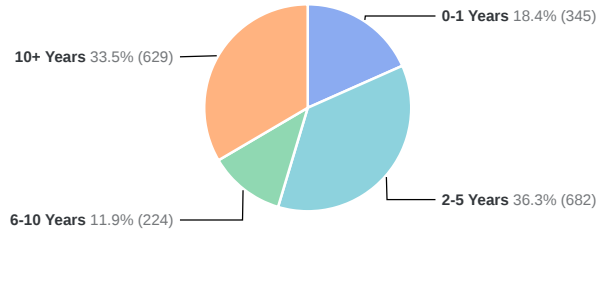
Average Response Score Metrics: Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)

Average Response Scores by Statement:

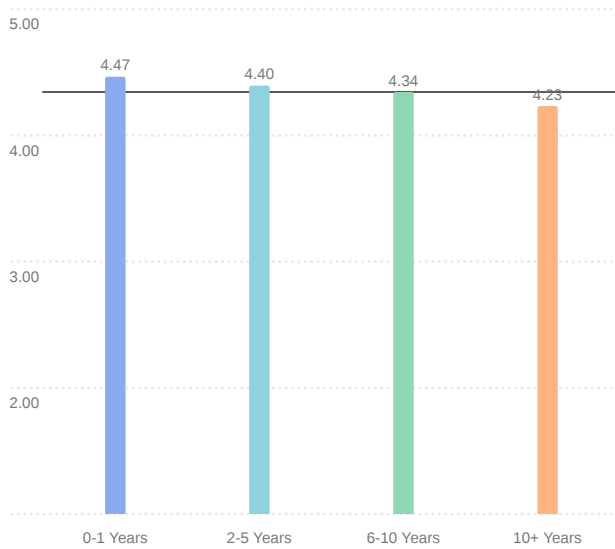
Overall Culture	Alpine	Century Park / Century Park East	Eastern	Kearny	Metro	Mission Control / Skills	Mountain Empire	North Coast	Northeast	Orange County	Other	Ramona
I believe managers apply the same rules for all workers	4.30	4.31	4.02	3.72	3.87	4.08	3.97	4.26	4.18	4.36	4.24	4.16
Information about important events and lessons learned is shared within my workgroup	4.55	4.53	4.28	4.11	4.27	4.14	4.19	4.50	4.43	4.44	4.44	4.38
Leaders encourage people to ask questions	4.41	4.53	4.27	4.13	4.37	4.35	4.13	4.47	4.38	4.50	4.43	4.37
Managers treat workers with respect	4.37	4.59	4.18	4.15	4.20	4.26	4.25	4.42	4.34	4.53	4.44	4.34
My supervisor makes sure all employee concerns are heard before job decisions are made	4.27	4.42	4.11	4.04	4.20	4.15	4.13	4.40	4.35	4.40	4.36	4.33
My supervisor would use whatever power they have to help me out	4.46	4.56	4.23	4.18	4.33	4.26	4.38	4.47	4.50	4.51	4.50	4.46
People in my workgroup treat each other with respect	4.49	4.62	4.24	4.04	4.12	4.25	4.13	4.50	4.41	4.40	4.49	4.43
People listen to one another: it is rare that someone's views go unheard	4.22	4.32	4.02	3.80	4.09	4.06	3.94	4.33	4.19	4.33	4.19	4.13
People report mistakes they make, even if others do not notice them	4.10	4.08	4.01	3.67	3.80	3.84	3.69	4.14	3.94	4.07	4.01	4.03
The company cares about my opinions	3.99	4.24	3.85	3.70	3.93	4.03	3.66	4.21	3.95	4.24	4.13	3.74

## 5. Comparison by Tenure

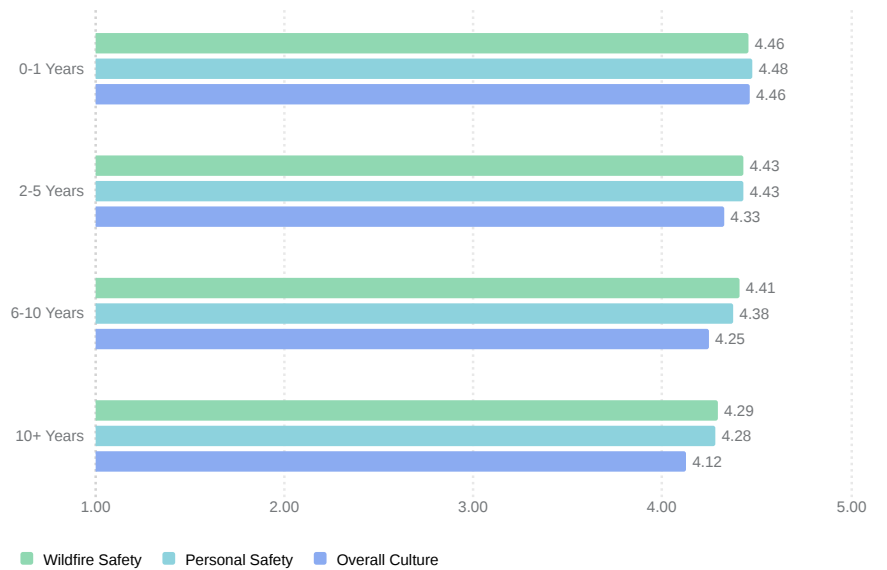
Number of Responses 1,880



Overall Average Response Score



Performance Category Average Response Scores



Comparisons were not computed for groups with fewer than five respondents.  
**Average Response Score Metrics:** Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)

Average Response Scores by Statement

Wildfire Safety	0-1 Years	2-5 Years	6-10 Years	10+ Years
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.81	3.72	3.71	3.62
I feel comfortable discussing wildfire hazards with my supervisor	4.63	4.61	4.57	4.44
Leaders actively seek out signs of potential wildfire hazards	4.49	4.41	4.37	4.25
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.53	4.54	4.52	4.38
Our management acts quickly to address wildfire hazards	4.54	4.53	4.50	4.43
People in my workgroup report all wildfire hazards, no matter how minor	4.42	4.41	4.38	4.24
People look for wildfire hazards and risks as work progresses	4.43	4.42	4.42	4.27
Protecting the community from wildfire hazards is clearly a high priority with management	4.68	4.68	4.65	4.61
Wildfire and personal safety concerns are communicated openly	4.58	4.57	4.53	4.40

Average Response Scores by Statement

Personal Safety	0-1 Years	2-5 Years	6-10 Years	10+ Years
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.52	4.48	4.40	4.28
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.39	4.35	4.42	4.31
I take responsibility for the safety of myself and others in my work area	4.70	4.71	4.71	4.68
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.57	4.56	4.50	4.41
Leaders keep people prepared to intervene when an emergency occurs	4.47	4.45	4.36	4.25
Leaders use mistakes and incidents as learning opportunities	4.53	4.44	4.44	4.28
Pausing work for hazards and safety concerns is viewed positively	4.58	4.55	4.47	4.44
People focus on one task at a time and avoid distractions	4.07	3.95	3.83	3.77
People have the ability to respond to and correct problems and errors before they get out of control	4.50	4.44	4.35	4.22
People have the skills they need to resolve workplace safety issues	4.48	4.39	4.35	4.23
We have the right tools for the job	4.45	4.36	4.32	4.19

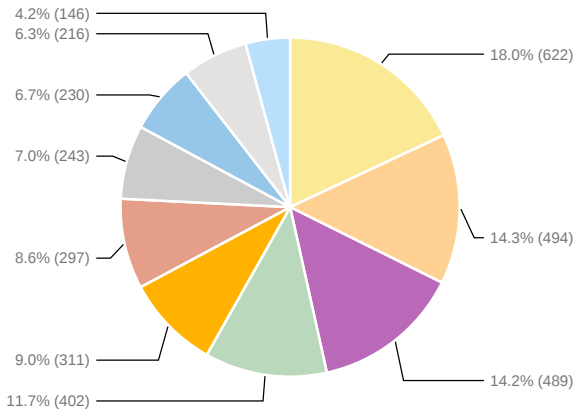
Average Response Scores by Statement

Overall Culture	0-1 Years	2-5 Years	6-10 Years	10+ Years
I believe managers apply the same rules for all workers	4.40	4.22	4.15	3.97
Information about important events and lessons learned is shared within my workgroup	4.54	4.45	4.41	4.27
Leaders encourage people to ask questions	4.57	4.45	4.42	4.25
Managers treat workers with respect	4.58	4.47	4.31	4.28
My supervisor makes sure all employee concerns are heard before job decisions are made	4.48	4.33	4.29	4.19
My supervisor would use whatever power they have to help me out	4.62	4.49	4.41	4.31
People in my workgroup treat each other with respect	4.63	4.47	4.41	4.27
People listen to one another: it is rare that someone's views go unheard	4.32	4.23	4.15	4.03
People report mistakes they make, even if others do not notice them	4.16	4.08	3.92	3.78
The company cares about my opinions	4.32	4.10	4.00	3.87



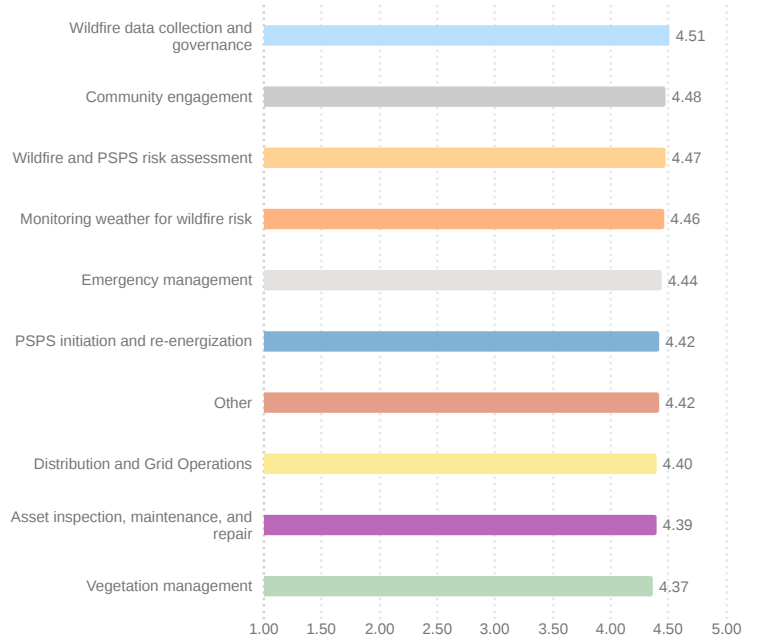
## 6. Comparison by Wildfire Activities

Number of Responses 1,708

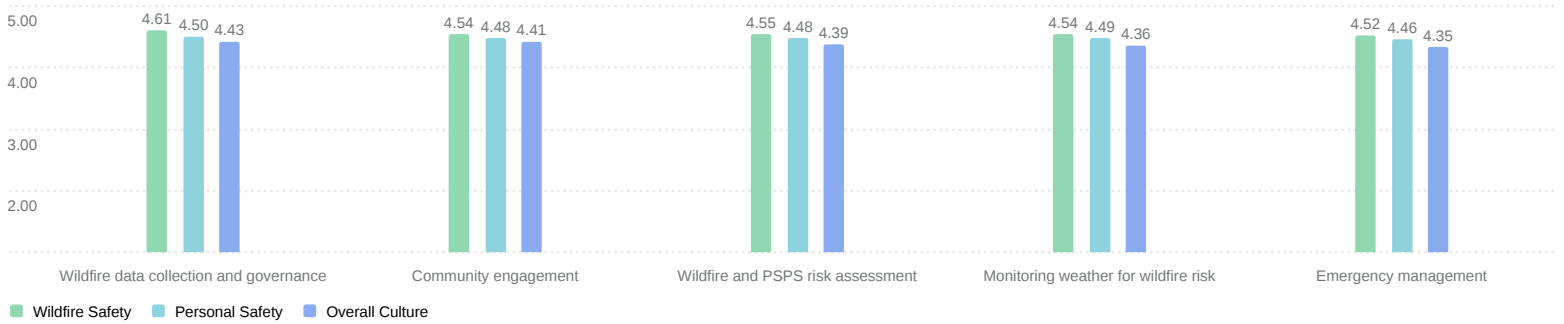


- Distribution and Grid Operations
- Wildfire and PSPS risk assessment
- Asset inspection, maintenance, and repair
- Vegetation management
- Monitoring weather for wildfire risk
- Other
- Community engagement
- PSPS initiation and re-energization
- Emergency management
- Wildfire data collection and governance

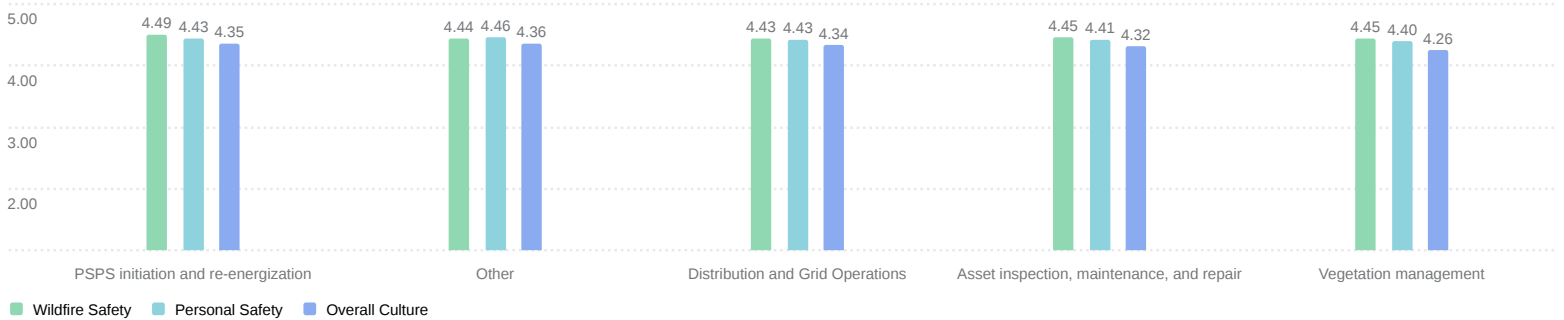
Overall Average Response Score



Performance Category Average Response Scores



Performance Category Average Response Scores



Comparisons were not computed for groups with fewer than five respondents.  
**Average Response Score Metrics:** Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)

Average Response Scores by Statement

Wildfire Safety	Asset Inspection, Maintenance, and Repair	Community Engagement	Distribution and Grid Operation	Emergency Management	Other
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.80	3.95	3.78	3.91	3.65
I feel comfortable discussing wildfire hazards with my supervisor	4.62	4.70	4.60	4.62	4.64
Leaders actively seek out signs of potential wildfire hazards	4.42	4.51	4.40	4.54	4.45
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.54	4.62	4.52	4.59	4.57
Our management acts quickly to address wildfire hazards	4.55	4.62	4.53	4.63	4.56
People in my workgroup report all wildfire hazards, no matter how minor	4.42	4.47	4.39	4.48	4.44
People look for wildfire hazards and risks as work progresses	4.45	4.54	4.43	4.52	4.39
Protecting the community from wildfire hazards is clearly a high priority with management	4.70	4.79	4.69	4.73	4.72
Wildfire and personal safety concerns are communicated openly	4.57	4.69	4.57	4.62	4.55

Average Response Scores by Statement

Personal Safety	Asset Inspection, Maintenance, and Repair	Community Engagement	Distribution and Grid Operation	Emergency Management	Other
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.47	4.59	4.44	4.51	4.49
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.35	4.42	4.47	4.46	4.44
I take responsibility for the safety of myself and others in my work area	4.71	4.79	4.72	4.77	4.79
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.57	4.68	4.56	4.60	4.61
Leaders keep people prepared to intervene when an emergency occurs	4.41	4.51	4.39	4.49	4.47
Leaders use mistakes and incidents as learning opportunities	4.45	4.57	4.44	4.43	4.49
Pausing work for hazards and safety concerns is viewed positively	4.53	4.61	4.53	4.62	4.61
People focus on one task at a time and avoid distractions	3.91	3.84	3.96	3.94	3.91
People have the ability to respond to and correct problems and errors before they get out of control	4.39	4.46	4.40	4.44	4.41
People have the skills they need to resolve workplace safety issues	4.36	4.49	4.40	4.44	4.41
We have the right tools for the job	4.37	4.33	4.37	4.39	4.41

Average Response Scores by Statement

Overall Culture	Asset Inspection, Maintenance, and Repair	Community Engagement	Distribution and Grid Operation	Emergency Management	Other
I believe managers apply the same rules for all workers	4.19	4.31	4.24	4.22	4.31
Information about important events and lessons learned is shared within my workgroup	4.45	4.57	4.43	4.47	4.45
Leaders encourage people to ask questions	4.47	4.58	4.46	4.49	4.52
Managers treat workers with respect	4.46	4.57	4.47	4.47	4.53
My supervisor makes sure all employee concerns are heard before job decisions are made	4.38	4.40	4.36	4.41	4.36
My supervisor would use whatever power they have to help me out	4.52	4.55	4.50	4.50	4.51
People in my workgroup treat each other with respect	4.44	4.57	4.49	4.45	4.52
People listen to one another: it is rare that someone's views go unheard	4.20	4.33	4.27	4.25	4.22
People report mistakes they make, even if others do not notice them	4.01	4.03	4.05	4.07	4.02
The company cares about my opinions	4.06	4.20	4.14	4.12	4.14

Comparisons by wildfire safety activities and response category continued on the next page.

**Comparisons were not computed for groups with fewer than five respondents.**  
**Average Response Score Metrics:** Low: < 3.30 (Red), Medium: 3.30 - 3.65 (Yellow), Moderately High: 3.65 - 4.10 (Light Green), High: 4.10 + (Dark Green)

Average Response Scores by Statement

Wildfire Safety	Monitoring Weather for Wildfire Risk	PSPS Initiation and Re-energization	Vegetation Management	Wildfire and PSPS Risk Assessment	Wildfire Data Collection and Governance
I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them	3.99	4.00	3.86	4.04	4.18
I feel comfortable discussing wildfire hazards with my supervisor	4.66	4.63	4.55	4.69	4.72
Leaders actively seek out signs of potential wildfire hazards	4.53	4.46	4.45	4.53	4.63
My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards)	4.63	4.54	4.52	4.61	4.67
Our management acts quickly to address wildfire hazards	4.65	4.58	4.52	4.63	4.67
People in my workgroup report all wildfire hazards, no matter how minor	4.52	4.42	4.45	4.51	4.56
People look for wildfire hazards and risks as work progresses	4.50	4.46	4.45	4.54	4.59
Protecting the community from wildfire hazards is clearly a high priority with management	4.76	4.73	4.67	4.77	4.75
Wildfire and personal safety concerns are communicated openly	4.63	4.63	4.55	4.64	4.67

Average Response Scores by Statement

Personal Safety	Monitoring Weather for Wildfire Risk	PSPS Initiation and Re-energization	Vegetation Management	Wildfire and PSPS Risk Assessment	Wildfire Data Collection and Governance
Accidents and incidents are investigated completely to find out what happened and the corrective actions needed	4.54	4.44	4.46	4.51	4.63
I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment	4.49	4.42	4.39	4.45	4.42
I take responsibility for the safety of myself and others in my work area	4.78	4.73	4.72	4.78	4.76
If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor	4.62	4.60	4.46	4.61	4.60
Leaders keep people prepared to intervene when an emergency occurs	4.53	4.48	4.39	4.50	4.60
Leaders use mistakes and incidents as learning opportunities	4.50	4.47	4.42	4.50	4.56
Pausing work for hazards and safety concerns is viewed positively	4.60	4.60	4.54	4.63	4.65
People focus on one task at a time and avoid distractions	3.99	3.87	4.00	3.99	3.87
People have the ability to respond to and correct problems and errors before they get out of control	4.47	4.40	4.38	4.48	4.49
People have the skills they need to resolve workplace safety issues	4.43	4.42	4.38	4.43	4.47
We have the right tools for the job	4.39	4.33	4.29	4.42	4.42

Average Response Scores by Statement

Overall Culture	Monitoring Weather for Wildfire Risk	PSPS Initiation and Re-energization	Vegetation Management	Wildfire and PSPS Risk Assessment	Wildfire Data Collection and Governance
I believe managers apply the same rules for all workers	4.27	4.23	4.16	4.29	4.32
Information about important events and lessons learned is shared within my workgroup	4.55	4.43	4.44	4.50	4.57
Leaders encourage people to ask questions	4.47	4.51	4.36	4.50	4.55
Managers treat workers with respect	4.46	4.55	4.29	4.54	4.55
My supervisor makes sure all employee concerns are heard before job decisions are made	4.40	4.36	4.31	4.43	4.44
My supervisor would use whatever power they have to help me out	4.52	4.50	4.44	4.55	4.56
People in my workgroup treat each other with respect	4.47	4.50	4.37	4.51	4.55
People listen to one another: it is rare that someone's views go unheard	4.28	4.24	4.19	4.27	4.34
People report mistakes they make, even if others do not notice them	4.08	4.03	4.04	4.11	4.13
The company cares about my opinions	4.14	4.15	3.99	4.18	4.24



OFFICE OF ENERGY  
INFRASTRUCTURE  
SAFETY



# Safety Culture Assessment Management Self-Assessment Report

July 2023

## San Diego Gas & Electric



## Section 1. Management Self-Assessment Results - 2021, 2022, 2023 to 2024 Goal

The questions on the management self-assessment are rated using a four-level behaviorally anchored rating scale (Public Compliance, Private Compliance, Stewardship, and Citizenship)\*. The color-coded table below presents the electrical corporation's self-ranking in May 2021, August 2022, July 2023, and where the electrical corporation expects to be at the end of 2024.

	2021	2022	2023	2024 Goal
<b>Organizational Sustaining Systems</b>	<b>Stewardship</b>	<b>Citizenship</b>	<b>Citizenship</b>	<b>Citizenship</b>
Wildfire Safety integrated into leader selection and promotion	Citizenship	Citizenship	Citizenship	Citizenship
Wildfire safety integrated into supervisor goals and objectives	Citizenship	Citizenship	Citizenship	Citizenship
Safety incorporated into position descriptions	Stewardship	Citizenship	Citizenship	Citizenship
Training available to frontline leaders	Stewardship	Citizenship	Citizenship	Citizenship
Training available to frontline workers	Stewardship	Citizenship	Citizenship	Citizenship
Training requirements for contractors	Stewardship	Citizenship	Citizenship	Citizenship
Rewards and incentives to support safety	Stewardship	Stewardship	Citizenship	Citizenship
<b>Structure and Governance</b>	<b>Citizenship</b>	<b>Citizenship</b>	<b>Citizenship</b>	<b>Citizenship</b>
Accountable for wildfire safety outcomes	Citizenship	Citizenship	Citizenship	Citizenship
Accountable for personal safety outcomes	Citizenship	Citizenship	Citizenship	Citizenship
Wildfire indicators tracked by senior leadership	Stewardship	Stewardship	Citizenship	Citizenship
Effectiveness of wildfire safety metrics	Citizenship	Citizenship	Citizenship	Citizenship
Monitor and adjust strategies to wildfire safety	Citizenship	Citizenship	Citizenship	Citizenship
Communication of wildfire safety metrics	Citizenship	Citizenship	Citizenship	Citizenship
<b>Safety Enabling Systems</b>	<b>Stewardship</b>	<b>Stewardship</b>	<b>Citizenship</b>	<b>Citizenship</b>
Investigations using root cause analysis	Stewardship	Stewardship	Citizenship	Citizenship
Quality of event investigations	Stewardship	Stewardship	Citizenship	Citizenship
Results of investigations	Stewardship	Stewardship	Citizenship	Citizenship
Process for reporting wildfire hazards	Citizenship	Citizenship	Citizenship	Citizenship
Systems to encourage sensitivity to weak signals	Citizenship	Citizenship	Citizenship	Citizenship
Responding to upset conditions	Stewardship	Citizenship	Citizenship	Citizenship
Process/structures to create a learning organization	Private Compliance	Stewardship	Citizenship	Citizenship
Audits of wildfire mitigation activities	Stewardship	Citizenship	Citizenship	Citizenship
Use of audit findings and tracking to closure	Stewardship	Stewardship	Stewardship	Citizenship

\*The four levels of safety culture maturity (Public Compliance, Private Compliance, Stewardship, and Citizenship) are based on research by Burke et al. (2002), (<https://psycnet.apa.org/record/2002-15213-006>, accessed Feb. 28, 2023) and Hofmann, Morgeson, and Gerras (2003), (<https://psycnet.apa.org/record/2003-04931-017>, accessed Feb. 28, 2023) and the work of Sentis Pty Ltd (<https://sentis.com.au/articles/safety-citizenship>, accessed Feb. 28, 2023).

## Section 1. Management Self-Assessment and Justification

### Dimension 1: Organizational Sustaining Systems

The electrical corporation reported the current status of 22 safety culture elements of its organizational culture and projected their state at the end of 2024. The response options for each element are provided in this section along with the electrical corporation's self-ranking in May 2021, August 2022, July 2023, and where the electrical corporation expects to be at the end of 2024. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

#### 1.1.1 To what extent is wildfire safety performance integrated into leadership selection/promotion decisions?

##### Safety Culture Maturity Scale

##### Public Compliance

Not considered

##### Private Compliance

Personal and wildfire safety performance are considered in selection/promotion decisions but are not the primary factors

##### Stewardship

Personal and wildfire safety performance are heavily weighted primary factors in selection / promotion decisions

##### Citizenship

Excellent personal and wildfire safety performance are necessary for advancement; poor safety performance eliminates leader from selection/promotion

##### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Citizenship	Citizenship	Citizenship	Citizenship

##### Justification

Wildfire safety is the highest priority at SDG&E. Possessing wildfire prevention knowledge, safety experience, and prior safety performance is a significant factor for leadership positions and weighs heavily in the selection process. Individuals with a record of poor safety performance, especially in the operational and wildfire areas, are not selected for a leadership role. SDG&E's continued improvement and high scores in its 2022 Safety Barometer Survey reflect how wildfire safety is embedded in our safety culture and leadership's performance.

## 1.1.2 How are wildfire safety responsibilities integrated into frontline supervisors' goals and objectives?

### Safety Culture Maturity Scale

#### Public Compliance

No annual goals or objectives related to wildfire safety

#### Private Compliance

Goals and objectives focus only on lagging indicators for wildfire or personal safety related to wildfire mitigation work

#### Stewardship

Goals and objectives contain a mix of leading and lagging indicators for wildfire and personal safety related to wildfire mitigation work

#### Citizenship

Goals and objectives contain a mix of leading and lagging indicators including a focus on the quality of each frontline supervisor's visible engagement in and support of wildfire and personal safety programs and initiatives

### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Citizenship	Citizenship	Citizenship	Citizenship

### 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 Tier 3 in three months, an accelerated timeframe that exceeds the six-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 fire prevention and fire safety.

### 1.1.3 To what extent is safety and the ability to work safely incorporated into position descriptions and expectations?

#### Safety Culture Maturity Scale

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**Public Compliance**

No mention of safety

**Private Compliance**

Focus is on compliance with rules and dismissal if found out of compliance

**Stewardship**

Emphasis on more than just compliance with rules, but each employee's position description includes that each employee has to speak up and intervene if unsafe conditions exist, both for wildfire and personal safety

**Citizenship**

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

#### Electrical Corporation Self-Ranking

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2021	2022	2023	2024 Goal
Stewardship	Citizenship	Citizenship	Citizenship

#### Justification

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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. Conducting safety job site visits is embedded in job descriptions for relevant positions such as Electric Safety Center employees, Skills Training Center instructors, and Construction Supervisors. 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) peer-to-peer observations, contractor observations and Serious Injury & Fatality (SIF) prevention program. At the operational level jobs and bid profiles are being updated with expectations of after-hours response during inclement events.



## 1.2.1 To what extent are training and support resources available to frontline supervisors to improve their safety leadership skills?

### Safety Culture Maturity Scale

#### Public Compliance

No training available

#### Private Compliance

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)

#### Stewardship

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.)

#### Citizenship

All criteria in "Stewardship" option are met; In addition, training includes advanced safety topics such as exposure management, and human performance reliability

### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Citizenship	Citizenship	Citizenship

### Justification

Frontline leaders get job specific wildfire safety training, and support resources are readily available to them to improve safety leadership skills. The 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 examples of training offerings provided to frontline leaders to develop their safety leadership skills. These trainings also touch on giving feedback and coaching behaviors. Wildfire mitigation safety is a key component of frontline leader and employee safety goals and incentive compensation plan metrics. SDG&E Vegetation Management began a collaborative sponsorship with San Diego Community College District in the development of a Line Clearance Qualified Arborist program to develop new frontline contractor workforce. The initiative has a major worker and wildfire safety component. Lastly, Wildfire Mitigation training is [Response truncated.]

## 1.2.2 To what extent are training and support resources available to frontline workers to improve their wildfire safety skills?

### Safety Culture Maturity Scale

#### Public Compliance

No training available

#### Private Compliance

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)

#### Stewardship

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.)

#### Citizenship

All criteria in "Stewardship" option are met; In addition, training includes advanced safety topics such as human performance reliability

### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Citizenship	Citizenship	Citizenship

### Justification

Frontline workers receive job specific wildfire safety training and support resources are made available to them to improve their wildfire safety skills. Annually, employees are trained on Wildfire Mitigation practices and processes. Some examples of training provided to frontline workers to improve their wildfire safety awareness and knowledge include annual PSPS tabletop exercises, Virtual Reality training around PSPS process and roles, and Electric Standard Practice No. 113.1 (ESP 113.1) which specifically addresses wildland fire prevention. Fire safety trainings are also provided for all electric field employees along with Vegetation Management field employees. Periodic joint inspections between SDG&E and Cal Fire and SED are performed for regulatory compliance and adherence to wildfire safety standards.

## 1.2.3 What are the personal safety and wildfire-specific training requirements of contractors?

### Safety Culture Maturity Scale

#### Public Compliance

No safety training required

#### Private Compliance

Site or location-specific general safety introduction and orientation

#### Stewardship

Electrical corporation-wide standardized safety training in addition to site-specific orientation

#### Citizenship

Electrical corporation-wide standardized safety training in addition to site-specific orientation and wildfire hazard awareness training

### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Citizenship	Citizenship	Citizenship

### Justification

All contractors are required to meet minimum personal safety and wildfire-specific training requirements in addition to site-specific orientation. Examples of such training include hazard awareness training, fire prevention and preparedness, identifying infractions, environmental regulations, review of written safety programs, and review of patrol processes. In addition, SDG&E requires that contractors and consultants develop internal company fire plans, undergo annual wildland fire prevention training, and that they follow SDG&E's ESP 113.1. SDG&E Safety Services performs observations of contracted workforce (e.g., compliance with wildfire safety procedures, proper fire PPE, and knowledge of SDG&E and internal company fire plans). Contractor employee specific training requirements are also verified through observing contractor employees performing specific tasks and then following up with the contractor requesting the training documentation. Training documentation is reviewed to meet [Response truncated.]

### 1.3.1 To what extent do rewards and incentives for operational leaders and workers support safety and mitigating wildfire hazards?

#### Safety Culture Maturity Scale

Public Compliance	Private Compliance	Stewardship	Citizenship
No rewards or incentives specific to safety or 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 mitigation activities	Rewards and incentives focus on leadership activities such as reporting wildfire concerns, generating innovative ideas to reduce wildfire hazards, and approaching others about safety concerns

#### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Stewardship	Citizenship	Citizenship

#### Justification

Rewards and incentives for operational leaders and workers support safety and mitigating wildfire hazards. The incentive compensation plan (ICP) emphasizes lagging goals such as number of ignitions, vegetation contacts, and wildfires caused by the utility. The ICP structure also emphasizes leading goals such as near misses, field safety observations, and resolving infractions. In addition to ICP, operational leaders and workers can be recognized and rewarded for creative ideas that improve our culture and strategic innovations that change the way we operate. The Energy with Purpose Recognition program celebrates the ways our employees do the right thing, champion people, and shape the future, including safety-related matters. Many mechanisms have been established to encourage and solicit creative and innovative ideas such as Wildfire Safety Challenge Sessions for leadership and Double Down Input Sessions at operating districts. SDG&E also recognizes safety-champions who are nominated a [Response truncated.]



## Section 1. Management Self-Assessment and Justification

### Dimension 2: Structure and Governance

The electrical corporation reported the current status of 22 safety culture elements of its organizational culture and projected their state at the end of 2024. The response options for each element are provided in this section along with the electrical corporation’s self-ranking in May 2021, August 2022, July 2023, and where the electrical corporation expects to be at the end of 2024. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

#### 2.1.1 Who is accountable for wildfire safety outcomes?

##### Safety Culture Maturity Scale

Public Compliance	Private Compliance	Stewardship	Citizenship
Not defined	Safety department	Operational leadership and Safety Department	Executive leadership with Safety Department as trusted advisor

##### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Citizenship	Citizenship	Citizenship	Citizenship

##### Justification

At SDG&E, safety is a core value. Every employee is accountable for wildfire safety outcomes in addition to their own personal safety and the safety of others. The entire executive leadership team is accountable to SDG&E’s Board of Directors, including its Safety Committee, for wildfire safety outcomes. Moreover, SDG&E’s Chief Safety Officer, with input from the Director of Safety, focuses on and is accountable for safety outcomes. Safety metrics, including both leading and lagging safety indicators are key components of every executive’s compensation and incentive structure. Additionally, leadership and employees can discuss and share wildfire safety and overall safety culture through the Executive Safety Council and Wildfire Council.

## 2.1.2 Who is accountable for personal safety outcomes?

### Safety Culture Maturity Scale

<b>Public Compliance</b>	<b>Private Compliance</b>	<b>Stewardship</b>	<b>Citizenship</b>
Not defined	Safety department	Operational leadership and Safety Department	Executive leadership with Safety Department as trusted advisor

### Electrical Corporation Self-Ranking

<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024 Goal</b>
Citizenship	Citizenship	Citizenship	Citizenship

### Justification

At SDG&E, safety is a core value. Every employee is responsible and accountable for their personal safety and the safety of others. Safety is a condition of employment. Working safely and looking out for the safety of our employees, contractors, customers, and the community is the responsibility of each employee. The entire executive leadership team is accountable to SDG&E's Board of Directors, including its Safety Committee, for personal safety outcomes. Moreover, SDG&E's Chief Safety Officer, with input from the Director of Safety, focuses on and is accountable for safety outcomes. Safety metrics, including both leading and lagging safety indicators are key components of every executive's compensation and incentive structure. Additionally, leadership and employees can discuss and share wildfire safety and overall safety culture through the Executive Safety Council and Wildfire Council.

### 2.1.3 Rate the types of wildfire safety indicators and objectives tracked by senior operational leadership.

#### Safety Culture Maturity Scale

Public Compliance	Private Compliance	Stewardship	Citizenship
No wildfire safety objectives	Leading and lagging wildfire safety indicators required to be reported for regulatory purposes	Required safety measures for regulatory purposes. Additional leading indicators used for wildfire mitigation work that are aligned with actionable initiatives	Required safety indicators. Additional leading indicators used for wildfire mitigation work that are aligned with actionable initiatives at each level of the organization

#### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Stewardship	Citizenship	Citizenship

#### Justification

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, SDG&E employs internal Forester Patrollers whose primary role is to perform off-cycle, hazard tree inspections throughout the year within the HFTD. Another example is SDG&E's bi-annual employee Safety Barometer Survey which includes 4 questions specific to wildfire mitigation that measure how employees 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. The Fire Potential Index (FPI) and meteorology reports are shared daily across the organization and are used to inform operational decisions. Vegetation Management performs a minimum of two separate regulatory compliance and hazard tree inspections annually throughout the HFTD. Patrols are scheduled, tracked, documented, and reported through this activity. Add [Response truncated.]

## 2.2.1 How effective are wildfire safety metrics in providing insight into critical areas of risk?

### Safety Culture Maturity Scale

#### Public Compliance

Not effective

#### Private Compliance

Reasonably effective in providing data and trends across company

#### Stewardship

Highly effective in providing data and trends in critical exposure areas

#### Citizenship

Highly effective in providing data, critical exposure area trends, and actionable insights

### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Citizenship	Citizenship	Citizenship	Citizenship

### Justification

Wildfire safety measures are highly effective in providing data and critical exposure area trends, as well as actionable insight. For example, in its enhanced vegetation management (EVM) program, SDG&E tracks outages caused by vegetation and then identifies specific species to target with enhanced clearances. Wildfire risk components like outages and tree data are used to develop a Vegetation Risk Index and Circuit Risk Index which identifies risk areas and is used in PSPS decision making. Additionally, components like ignition, outage, tree, asset data are used as inputs in the WiNGS Planning model to inform the grid hardening strategy in critical areas and on critical assets in the HFTD. Other examples include specific equipment replacement programs identified by trends such as expulsion fuse replacement, lightning arrestors, reconductor programs, strategic undergrounding (SUG), and applying covered conductor. The drone inspection program has evolved into a risk-based program where [Response truncated.]



## 2.2.2 How frequently does the senior safety team monitor and adjust actions and strategies related to wildfire safety?

### Safety Culture Maturity Scale

Public Compliance	Private Compliance	Stewardship	Citizenship
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

### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Citizenship	Citizenship	Citizenship	Citizenship

### Justification

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, at multiple regular meetings -- e.g., Fire Director Steering Committee meetings, the meetings of the Safety Committee of SDG&E’s Board of Directors and Wildfire Council meetings – leaders discuss and are held accountable for wildfire safety, mitigation action items, and follow-ups on fire issues or leading indicators. SDG&E emphasizes outreach, interaction, input from our community at the quarterly Wildfire Safety Community Advisory Council meetings with community safety partners to continue adjustments to wildfire safety strategies where deemed necessary. Several Joint IOU meetings to address various categories of wildfire mitigation work, such as, vegetation management, grid hardening, public outreach, and various others help advance continuous adjus [Response truncated.]

### 2.2.3 To what extent are wildfire safety metrics communicated throughout the organization?

#### Safety Culture Maturity Scale

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**Public Compliance**

Safety metrics are not shared

**Private Compliance**

Lagging indicators for wildfire outcomes are posted at local/site operations

**Stewardship**

Lagging and leading measures for wildfire safety are posted and discussed in regular management and supervisor meetings

**Citizenship**

Lagging and leading indicators for wildfire safety are discussed; individual/ team contributions to leading indicators are highlighted and recognized publicly

#### Electrical Corporation Self-Ranking

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2021	2022	2023	2024 Goal
Citizenship	Citizenship	Citizenship	Citizenship

#### Justification

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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, and Wildfire Safety Fairs in the back country.



## Section 1. Management Self-Assessment and Justification

### Dimension 3: Safety Enabling Systems

The electrical corporation reported the current status of 22 safety culture elements of its organizational culture and projected their state at the end of 2024. The response options for each element are provided in this section along with the electrical corporation's self-ranking in May 2021, August 2022, July 2023, and where the electrical corporation expects to be at the end of 2024. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

#### 3.1.1 What types of adverse events are investigated using root cause analysis?

##### Safety Culture Maturity Scale

Public Compliance	Private Compliance	Stewardship	Citizenship
Only fatal or serious incidents required to be reported to OSHA, CPUC reportable ignitions, or incidents required to be reported to Energy Safety (pursuant to Cal. Code Regs. title 14, Section 29301)	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 teams evaluate high risk situations for proactive opportunities to reduce exposure

##### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Stewardship	Citizenship	Citizenship

##### Justification

SDG&E investigates all incidents determined to have Serious Injury or Fatality (SIF) potential (per the Edison Electric Institute classification model). SDG&E also investigates near misses, although some near miss reports may be anonymous or information is not available, so there are times when a root cause analysis (RCA) may be limited. SDG&E's Asset Management team performs proactive equipment failure analysis. When equipment failures occur, SDG&E documents and tracks Equipment Failure Reports (EFRs) and has improved the EFR program. SDG&E's Electric Distribution Engineering (EDE) team performs RCAs for all catastrophic equipment failures. SDG&E has implemented a Joint Electric Operations Enhancement Program (JEOEP), a collaboration between Electric Regional Operations, Electric Distribution Operations, Field Service Delivery and Emergency Management teams, which serves as an event learning team. Additionally, the Ignition Management Program tracks ignitions and potential ignition [Response truncated.]

### 3.1.2 Rate the quality of event investigations.

#### Safety Culture Maturity Scale

<b>Public Compliance</b>	<b>Private Compliance</b>	<b>Stewardship</b>	<b>Citizenship</b>
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

#### Electrical Corporation Self-Ranking

<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024 Goal</b>
Stewardship	Stewardship	Citizenship	Citizenship

#### Justification

SDG&E’s event investigations focus on identifying the cause of the exposure and describing actions to control the exposure. The quality of investigations has improved at SDG&E. SDG&E holds regular investigation review meetings to learn and share the incidents. Also, the incident learnings are shared at larger sub-committees on the gas and electric side. Following each safety incident review meeting, key teachings, lessons learned, and corrective actions are compiled and circulated for broad awareness and are uploaded and made available in a SharePoint Site accessible to all employees. Similarly, After-Action Review/Improvement Planning Reports (AAR/IP) are shared for event learnings. The Ignition Management Program (IMP) has developed a process for reporting evidence of heat events. This process is published in ESP1219 Electric Incident Investigation and training efforts are underway across Electric Regional Operations (ERO). Personnel submitting evidence of heat for an incident are [Response truncated.]

### 3.1.3 What happens with investigation results?

#### Safety Culture Maturity Scale

<b>Public Compliance</b>	<b>Private Compliance</b>	<b>Stewardship</b>	<b>Citizenship</b>
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; lessons learned are shared throughout the organization	Systemic approach to tracking/closing actions using high value controls; lessons learned leveraged broadly across the organization to effect change and control exposure (e.g., leading to procedural or policy changes throughout organization where applicable)

#### Electrical Corporation Self-Ranking

<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024 Goal</b>
Stewardship	Stewardship	Citizenship	Citizenship

#### Justification

SDG&E reviews all significant incidents and activations to identify potential improvements and establish a comprehensive and measurable After-Action Report (AAR). SDG&E's AAR program aligns and integrates the processes within 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. Incident investigation results, corrective actions, and lessons learned are shared regularly at the larger sub-committee meetings on the electric and gas side and with learning teams. One example demonstrating how results affect organizational change is the creation of a new Aviation Services Safety Officer.

### 3.2.1 What kind of process is used by frontline workers to recognize and report wildfire hazards?

#### Safety Culture Maturity Scale

Public Compliance	Private Compliance	Stewardship	Citizenship
No formal process	Process exists to report wildfire hazards but no training or feedback	Process established, workforce is trained in the process, and it is communicated widely; there is consistent follow-up to reduce exposure	Process established and communicated for wildfire hazard reporting; workforce is trained in the process and encouraged to report wildfire hazards; results broadly shared across the organization to spur learning and exposure reduction

#### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Citizenship	Citizenship	Citizenship	Citizenship

#### 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, as well as the public and contractors, by providing a safe operating and construction environment. These programs 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 inspections throughout the HFTD, patrols prior to RFW days, and post-PSPS patrols prior to restoration of outages. SDG&E also utilizes the Ignition Management Program to gather information on ignitions and near ignitions. SDG&E’s Near Miss application was also enhanced to include an option for frontline workers to report “Potential for Fire Ignition.” Annual ESP 113.1 training and monthly newsletter are some of the ways SDG&E communicates and shares takeaways across the organization. [Response truncated.]

### 3.3.1 What structures, systems, and/or process have been established to encourage sensitivity to weak signals of wildfire hazards?

#### Safety Culture Maturity Scale

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Public Compliance	Private Compliance	Stewardship	Citizenship
No formal process or structure	Workforce is encouraged to report wildfire hazards as it sees them	System established for reporting and mitigating wildfire hazards; frontline supervisors encourage reporting of weak signals	A cross-functional team is established to proactively look for, track, and mitigate wildfire hazards and potential black swan situations

#### Electrical Corporation Self-Ranking

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2021	2022	2023	2024 Goal
Citizenship	Citizenship	Citizenship	Citizenship

#### Justification

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SDG&E has systems and processes to make observations, to report, and to mitigate wildfire hazards. For example, the Ignition Management Program includes a process in which electric troubleshooters (ETS) in the field report evidence of heat events to better educate mitigation owners and report OEIS defined fires. Additionally, the Electric Risk Analysis (ERA) Team, PSPS pre-patrols, drone inspections, and vegetation patrols exemplify processes to help identify fraying, strain or abrasion on wires or wind contact.

### 3.3.2 What steps are taken to ensure frontline supervisors and workforce can respond quickly to upset conditions?

#### Safety Culture Maturity Scale

Public Compliance	Private Compliance	Stewardship	Citizenship
No formal training or preparation	Common upset conditions have been identified and response protocols are reviewed regularly	Simulations and drills 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

#### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Citizenship	Citizenship	Citizenship

#### 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.

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, has been instrumental to prepare our Operations workforce for an all-risk, all-hazard approach to emergency and wildfire response. Additionally, under Electric Regional Operations, training and exerci  
 [Response truncated.]



### 3.3.3 What processes and structures have been established to create a learning organization?

#### Safety Culture Maturity Scale

**Public Compliance**

Few processes, training or structures have been established for sharing safety-related lessons learned across the organization

**Private Compliance**

The organization has implemented a knowledge management system for sharing safety-related best practices and incidents throughout the organization

**Stewardship**

All criteria met in "Private Compliance" option, plus processes exist for systematically using the knowledge management system and implementing safety-related best practices

**Citizenship**

All criteria met in "Stewardship" option, plus these processes for tapping best practices in knowledge management system are used routinely and by nearly everyone

#### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Private Compliance	Stewardship	Citizenship	Citizenship

#### Justification

SDG&E operates within a Company-wide Safety Management System (SMS) focused on fostering a learning environment to enable continuous safety improvement. SDG&E has implemented several programs and processes to enhance SDG&E's commitment to being a learning organization and sharing safety-related best practices and lessons learned throughout the organization. This includes sharing safety reminders based on data trends and observations. For example, SDG&E's Serious Injury & Fatality prevention, Behavior Based Safety/safety observations, and the Safety Barometer and Engagement Surveys, are all programs committed to implementing safety-related best practices company-wide to create a strong safety culture and place the highest priority on employee, contractor, customer, public safety and continuous learning and improvement.

Each week, SDG&E leadership (typically SDG&E's Chief Safety Officer with rotating Officer messages) sends a company-wide safety message highlighting best practices, le [Response truncated.]

### 3.4.1 What types of safety audits are used for activities related to wildfire mitigation?

#### Safety Culture Maturity Scale

Public Compliance	Private Compliance	Stewardship	Citizenship
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 level of wildfire risk present	Systemic and rigorous self, independent, and internal audits conducted and used for alignment, calibration, and learning

#### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Citizenship	Citizenship	Citizenship

#### Justification

SDG&E performs internal audits on programs and departments that include wildfire hazard mitigation within their scope. For instance, 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. There is also a Contractor Safety Services audit of contractor oversight, which focuses on controls to ensure compliance with safety and environmental policies and procedures, and programs to mitigate incidents and injuries. An Aviation Services audit inc [Response truncated.]

### 3.4.2 How are the findings from safety audits used for activities related to wildfire mitigation tracked to closure?

#### Safety Culture Maturity Scale

##### Public Compliance

No formal tracking mechanism

##### Private Compliance

Self-tracking of closures; no verification

##### Stewardship

Audit findings tracked and verified to closure

##### Citizenship

Audits tracked, implementation verified to closure, and effectiveness validated

#### Electrical Corporation Self-Ranking

2021	2022	2023	2024 Goal
Stewardship	Stewardship	Stewardship	Citizenship

#### 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. 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. Corrective actions are incorporated into training exercises, when applicable, to validate effectiveness and to test implementation. Additionally, those findings are included in future audits as items of interest to ensure appropriate follow up. SDG&E's SMS developed a safety audit process, which will include validating effectiveness of corrective actions, to be implemented in 2024.



## Section 2. Summary Plan for 2024

The electrical corporation submitted a summary action plan for the work that is planned for the coming 12-month period to achieve the targets for the end of 2024 indicated in its management self-assessment. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

### A1. Action/Activity 1

Implement SDG&E's developed "Process for Completing Audit Plans of the Safety Management System" which encompasses risk prioritization and validating effectiveness of implemented corrective actions for continuous improvement. SDG&E's safety dashboard can be utilized to analyze trends in leading and lagging safety indicators as a general measure of effectiveness pre- and post-implementation. Implementation roadmap will be developed by July 2024.

#### B1. Deadline

07/31/2024

#### C1. Management Self-Assessment Reference(s)

3.4.2

### A2. Action/Activity 2

Explore the use of a centralized repository for safety-related audits, lessons learned and corrective actions.

#### B2. Deadline

7/31/2024

#### C2. Management Self-Assessment Reference(s)

3.4.2



## Section 3. Safety Culture Objectives, Lessons Learned, and 2022 Recommendations

The electrical corporation provided a description of their 12 month and 3-year safety culture objectives along with a summary of lessons learned, and a report on the implementation of recommendations from the previous year's SCA report. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

### 3.1 Objectives for the Next 12 Months

#### A. Objective

Continuously improving the safety culture by focusing on management leadership, worker participation, and a proactive approach to finding and fixing hazards

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

Number of near misses

#### C1. 12-Month Target

300

#### D1. Description of Objective

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. SDG&E is focusing not only on the number of near miss report submissions, but the quality, type and follow-up of submitted reports.

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

Environment and safety compliance management program (ESCMP) Findings Mediated

#### C2. 12-Month Target

100%

#### D2. Description of Objective

SDG&E's ESCMP allows SDG&E to document safety incidents (including wildfire safety incidents) in the system of record and an action plan is identified and tracked through completion in a timely manner.

## A. Objective (Continued)

### B3. Progress Metrics (if applicable)

Number of Employee Safety Observations

### C3. 12-Month Target

17178

### D3. Description of Objective

Safety observations, supervisors/leaders observing field crews, and peer-to-peer 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 and provide employees an opportunity to discuss safety issues with field leadership. 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.

### B4. Progress Metrics (if applicable)

Number of Contractor Safety Observations

### C4. 12-Month Target

12000

### D4. Description of Objective

Safety observations of third-party contractors (including those performing wildfire mitigation (e.g., vegetation management) 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. This collaboration between SDG&E and its contractors help move the safety culture forward and ultimately improve safety performance of contractors working on behalf of SDG&E.

### B5. Progress metrics (if applicable)

Annual PSPS Training for Electric Regional Operations

### C5. 12-Month Target

100% of ERO personnel

### D5. Description of Objective

Electric Regional Operations is required to complete an annual PSPS training course to assist in preparedness for fire season and PSPS protocols. The training objectives of this course are to: define roles/responsibilities of patroller and observer, identify types of required fire equipment for the FPI, describe pre- and post-patrols structure and responsibilities, outline damage reporting requirements, explain damage submittal process and required documentation, identify 2023 staging areas, and promote safe work practices.



## Section 3. Safety Culture Objectives, Lessons Learned, and 2022 Recommendations

The electrical corporation provided a description of their 12 month and 3-year safety culture objectives along with a summary of lessons learned, and a report on the implementation of recommendations from the previous year's SCA report. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.

### 3.2 Objectives for the Next 3 Years

#### A. Objective

Continuously improving the safety culture by focusing on management leadership, worker participation, and a proactive approach to finding and fixing hazards

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

Number of Stop the Job/Stop the Task

##### C1. 3-Year Target

2025 target - 20/year

#### D1. Description of Objective

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.

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

Number of Serious Injury or Fatality (SIF) potential assessments completed

##### C2. 3-Year Target

2025 target - Review all incidents (near misses/injuries/motor vehicle incidents) and determine all which have SIF potential; for those that do and for which adequate information is available, 100% will be investigated and analyzed, and preventative actions generated where necessary (excluding incidents that are out of employer's control)

#### D2. Description of Objective

Assessing Near Miss incidents and Safety Incidents for the potential to have caused serious injury or fatality. Of those incidents assessed and determined to have SIF-potential, including wildfire-related incidents, perform a root cause analysis/in-depth investigation to allow for identification of corrective actions and/or preventative actions to reduce risk and exposure, and broad sharing of lessons learned.

## A. Objective (Continued)

### B3. Progress Metrics (if applicable)

Number of near misses

### C3. 3-Year Target

2025 target 300-400

### D3. Description of Objective

Near miss reports allow SDG&E to communicate, assess, 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.

### B4. Progress Metrics (if applicable)

Number of Safety Observations

### C4. 3-Year Target

2025 target 18,000-20,000

### D4. Description of Objective

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.

### B5. Progress Metrics (if applicable)

Number of Contractor Safety Observations

### C5. 3-Year Target

2025 target 15,500-17,000

### D5. Description of Objective

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 observation of at-risk behaviors and recognition of safe behaviors help move safety culture forward and ultimately improve safety performance for contractors performing work on behalf of SDG&E.



## A. Objective (Continued)

### B6. Progress Metrics (if applicable)

Environment and safety compliance management program (ESCMP) Findings Mediated

### C6. 3-Year Target

100% is always the target

### D6. Description of Objective

SDG&E's ESCMP allows SDG&E to document safety incidents (including wildfire safety incidents) in the system of record and an action plan is identified and tracked through completion in a timely manner.

### B7. Progress Metrics (if applicable)

After Action Review (AAR) performed

### C7. 3-Year Target

100%

### D7. Description of Objective

SDG&E performs incident review and de-brief to identify best practices, lessons learned and opportunities for improvement following all emergency operations center activations.



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**SDG&E**

2023 Safety Culture Assessment

## Section 3. Safety Culture Objectives, Lessons Learned, and 2022 Recommendations

*The electrical corporation provided a description of their 12 month and 3-year safety culture objectives along with a summary of lessons learned, and a report on the implementation of recommendations from the previous year's SCA report. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.*

### 3.3 Lessons Learned

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

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.

#### B1. Actions Taken

Examples of top management demonstrating their leadership and commitment to safety include:

- SDG&E's 2023 "Start Strong" office safety event sponsored by the Chief Safety Officer which bussed approximately 1,300 field employees to attend a safety event to set clear leadership goals and expectations, recognize safe behavior, and share important mental health and suicide awareness messages.

- Executive Safety Council Meetings – these meetings integrate employee and supervisor dialogue sessions so that employees have an opportunity to share safety experiences directly with Company leadership.
- Electric Safety Sub-committee and Electric Safety Center – SDG&E's Electric Safety Center sends weekly safety messaging and leads monthly Electric Safety Sub-committee meetings where employees gather to discuss safety suggestions, concerns, and track issues through resolution.
- SDG&E's Chief Safety Officer and management participate in Electric Safety Sub-committee, Safety Incident Review Meeting and Behavior Based Safety (BBS) meetings.
- Weekly Leadership Safety Messaging – Each Friday, SDG&E's Chief Safety Officer, or other leadership, sends a company-wide e-mail communication highlighting the safety successes, challenges, and key teachings from the week's safety incidents, near misses, and observations. This messaging also includes important safety tips and reminders.

2022 Employee Safety Barometer Survey results: Management participation score has shown continuous improvement, from 91.7 in 2018, to 98.3 in 2020, to 98.7 in 2022.

## A2. Major Theme/ Lesson Learned 2

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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.

### B2. Actions Taken

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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 enhance supervisor engagement.
- Developed and implemented training curriculum and testing program for supervisors and working foreman to enhance their leadership skills.
- In 2022, SDG&E launched a company-wide Supervisor Training Academy for frontline leaders, focusing on safety, supervisor effectiveness, diversity and inclusion, compliance, employee engagement and culture.

2022 Employee Safety Barometer Survey results: Supervisor participation score has shown continuous improvement, from 90.8 in 2018, to 99.0 in 2020, to 99.2 in 2022.

## A3. Major Theme/ Lesson Learned 3

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Employee Involvement: Employee Participation items specify selected actions and reactions that are critical to making a safety program work. Emphasis placed on personal engagement, responsibility, and compliance.

### B3. Actions Taken

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SDG&E increased measures to promote safety awareness and promoted an active role in incident investigations and in identifying and eliminating hazards. For example:

- In 2022, SDG&E experienced an increased number of near miss events reported by contractors and employees. In 2022, 53.4% of the 317 total near miss submissions were anonymous – an approximate 5% improvement from 2021. SDG&E continues to encourage non-anonymous near miss submissions by highlighting the teachings, assessment, follow-up and safety improvements resulting from employee submissions.
- Performing peer-to-peer behavior-based safety observations
- Field employee participation in Electric Safety Subcommittee and Gas Safety Subcommittee
- Highlighted Safety Committee, Cyber Champion and SMS Champion involvement and recognized safety leaders during annual Safety Congress and award ceremony. Hosted first annual “ERO Excellence Awards” recognizing electric employees with exemplary efforts, as nominated by their colleagues.
- Held first annual Line Assistant and Apprentice Summit and Working Foreman Summit for electric workers.

2022 Employee Safety Barometer Survey results: Employee participation score has shown continuous improvement, from 85.3 in 2018, to 95.8 in 2020, to 96.6 in 2022.

## A4. Major Theme/ Lesson Learned 4

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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.

### B4. Actions Taken

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SDG&E improved the frequency of detailed and regularly scheduled inspections and focused on improving safety training for new employees. For example:

- Enhanced new-hire employee orientation and skills training with added safety content; Wildfire safety trainings.
- Electric Safety Subcommittees, Line Assistant and Working Foremen summits
- Annual Safety Congress and award ceremony, ERO excellence awards, 2023 Start Strong offsite safety event
- In 2022, SDG&E launched of a new tool for air quality notifications where supervisors receive automatically generated alerts via email and text when the Air Quality Index (AQI) reaches regulated thresholds.
- 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 volunteer front-line employees (employee-led and management-supported).

2022 Employee Safety Barometer Survey results: Safety Support Activities score shows continuous improvement, from 89.0 in 2018, to 96.9 in 2020, to in 98.0 in 2022.

## A5. Major Theme/ Lesson Learned 5

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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.

## B5. Actions Taken

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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: BAPP/BBS, Near-Miss Reporting).

- SDG&E solicits feedback, safety concerns and safety suggestions from its workforce during regular meetings (e.g., Electric Safety Subcommittee) and encourages near miss submittals. SDG&E also surveys its workforce via Employee Engagement and Safety Barometer surveys and uses the results to develop action plans for continuous improvement. Additionally, SDG&E seeks feedback and any input teams might have around wildfire safety and encourages workers to provide input by sending an email to

[WildfireSafetyIdeas@sdge.com](mailto:WildfireSafetyIdeas@sdge.com).

- 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 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. In 2022, SDG&E not only saw an increase in submitted near miss reports (371), but importantly saw advancement in the quality and type of reports. For example, there was an increase in procedural-related and human error-related reports from prior years.

2022 Employee Safety Barometer Survey results: Safety Support Climate score shows continued improvement, from 89.8 in 2018, to 98.6 in 2020, to 99.3 in 2022.



## Section 3. Safety Culture Objectives, Lessons Learned, and 2022 Recommendations

*The electrical corporation provided a description of their 12 month and 3-year safety culture objectives along with a summary of lessons learned, and a report on the implementation of recommendations from the previous year's SCA report. All responses submitted by the electrical corporation are presented as submitted, without revision. Responses exceeding the character limit are truncated.*

### 3.4 2022 Recommendations

#### A1. Recommendation 1

1. SDG&E should continue to develop and implement actions to reduce barriers to prioritizing safety over job task goals.
2. Leadership should consistently demonstrate to workers that safety is the top priority through words, decision-making, and actions, especially when there is a short deadline or pressures to re-energize to reduce customer impact.

#### B1. Actions Taken

Although SDG&E's 2022 SCA Report was only issued in May 2023, SDG&E continually works to develop and implement actions to demonstrate leadership commitment to prioritizing safety over production. For example, SDG&E has a formalized "Stop Work Authority Process" and is continuing to socialize across all districts and departments to empower workers to "stop the job" whenever deemed unsafe to proceed. Process implementation and messaging starts with messaging from SDG&E's Chief Safety Officer conveying leadership's support to prioritize safety above all else. Stop Work Authority Process steps are summarized in bulletins that are posted across various company locations. Messaging is also promoted during leadership field visits and safety observations. Safety teams are meeting with operational leadership to solicit feedback and any areas of concern.

#### C1. Results

SDG&E's 2022 Safety Barometer Survey results for the "Management Commitment" section were 98.7%. The specific survey question of "Priority of Safety Relative to Production" scored 98.9%.

## A2. Recommendation 2

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1. SDG&E should combine visits whenever possible.
2. In addition, SDG&E should better equip frontline workers to handle potentially dangerous interactions with the public environments by:
  - Improving communication to work crews by providing pertinent information about previous incidents at specific job sites and accurate contact information for owners and inhabitants of properties they are visiting.
  - Providing further de-escalation training to employees.

## B2. Actions Taken

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Although SDG&E's 2022 SCA Report was only issued in May 2023, SDG&E continually works to mitigate the risk from hostile interactions with members of the public. For example, SDG&E's recently established Field Service Delivery (FSD) organization is focused on enhancing the way our company conducts field work by optimizing processes, resources, and technology from the point of job intake and design through job execution in the field. This would include all gas, electric and service-order based jobs. FSD's primary objectives are to: (1) Streamline our business practices using modern technology tools, and (2) Align our processes to optimize the employee and customer experience by creating a "one stop shop" for all SDG&E field work. Initial implementation in 2023 includes SDG&E's Electric Regional Operations (ERO) organization. On Oct. 31, 2022, FSD launched the new Geocall Electric Pre-Construction Mobile Fielding Application. ERO Construction Supervisors and back-office team members use the mobile fielding app to digitally capture job requirements during pre-construction field work. Additionally, SDG&E's Asset Management team is initiating efforts to optimize routine inspection frequency to avoid duplication/multiple visits to same site. SDG&E has enhanced its public outreach and communication efforts. For example, hosting Wildfire Safety Fairs, leveraging social media and neighborhood sites to educate and notify customers of work in their area, radio, television and online ad campaigns educating our customers on PSPS events, patrols, and restoration processes.

## C2. Results

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[No Response Provided]

### A3. Recommendation 3

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1. SDG&E should continue to build on its efforts to track trends in safety event related reporting, specifically tracking the quality of near-miss investigations and addressing gaps in its Ignition Management Program.
2. SDG&E should continue to focus on tracking trends in near-miss identification, reporting, and investigation. SDG&E should monitor the trend in non-anonymous near-miss reporting, as more non-anonymous reporting is an indication of greater safety culture maturity.
3. SDG&E should complete actions associated with addressing “issues with gathering data and getting proper notification from the events that are occurring in the field” by July 31, 2023, the deadline indicated in SDG&E’s Summary Plan for 2023.
4. SDG&E should continue to address issues and gaps in its Ignition Management Program to increase event investigation quality and share lessons learned broadly across SDG&E.

### B3. Actions Taken

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Although SDG&E's 2022 SCA Report was only issued May 2023, SDG&E continually deploys measures to enhance its Near Miss Reporting by capturing which are reported anonymously and non-anonymously. In addition, SDG&E is exploring ways to encourage reporting near misses non-anonymously in an effort to be proactive about follow up activities and target specific business units for further engagement.

The Ignition Management Program (IMP) has developed a process for reporting evidence of heat events. This process is published in ESP1219 Electric Incident Investigation and training efforts are underway across Electric Regional Operations (ERO). Personnel submitting evidence of heat for an incident are recognized and celebrated, advancing SDG&E’s overall safety culture. In addition, SDG&E fire coordinators follow up on site and consult with SME on all OEIS reportable fires (defined by Regulation 29300, which was formally implemented in Q1 2023).

### C3. Results

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YTD, through June 30, 2023, 42% of employee-reported Near Miss Reports are submitted non-anonymously.





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**SDG&E**

*2023 Safety Culture Assessment*

## Section 4. Supporting Documents

*Supporting documentation for the Management Self-Assessment was submitted by the electrical corporation\*. A list of file names provided by the electrical corporation is provided below.*

### File 1

2023 SCA SDG&E Self Assessment FINAL.pdf

### File 2

2023 SDGE Safety Culture Management Self-Assessment SUBMISSION.xlsx

*\*Public link with supporting documentation for the Management Self-Assessment submitted by the electrical corporation:  
<<https://nscftp.nsc.org/public/folder/e0a3BvWSJkipOLEH3mU2cQ/SDG%26E%20Attachments>> (assessed July 13, 2023).*

## 1.1 PERFORMANCE MANAGEMENT

1.1.1 – 2022: 4, 2023: 4, 2024: 4

### **To what extent is wildfire safety performance integrated into leadership selection/promotion decisions?**

Wildfire safety is the highest priority at SDG&E. Possessing wildfire prevention knowledge, safety experience, and prior safety performance is a significant factor for leadership positions and weighs heavily in the selection process. Individuals with a record of poor safety performance, especially in the operational and wildfire areas, are not selected for a leadership role. SDG&E's continued improvement and high scores in its 2022 Safety Barometer Survey reflect how wildfire safety is embedded in our safety culture and leadership's performance.

1.1.2 – 2022: 4, 2023: 4, 2024: 4

### **How are wildfire safety responsibilities integrated into frontline supervisors' goals and objectives?**

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 Tier 3 in three months, an accelerated timeframe that exceeds the six-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 fire prevention and fire safety.

1.1.3 – 2022: 4, 2023: 4, 2024: 4

### **To what extent is safety and the ability to work safely incorporated into position descriptions and expectations?**

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. Conducting safety job site visits is embedded in job descriptions for relevant positions such as Electric Safety Center employees, Skills Training Center instructors, and Construction Supervisors. 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) peer-to-peer observations, contractor observations and Serious Injury & Fatality (SIF) prevention program. At the operational level jobs and bid profiles are being updated with expectations of after-hours response during inclement events.

## 1.2 WORKFORCE DEVELOPMENT

1.2.1 – 2022: 4, 2023: 4, 2024: 4

### **To what extent are training and support resources available to frontline supervisors to improve their safety leadership skills?**

Frontline leaders get job specific wildfire safety training, and support resources are readily available to them to improve safety leadership skills. The 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 examples of training offerings provided to frontline leaders to develop their safety leadership skills. These trainings also touch on giving feedback

and coaching behaviors. Wildfire mitigation safety is a key component of frontline leader and employee safety goals and incentive compensation plan metrics. SDG&E Vegetation Management began a collaborative sponsorship with San Diego Community College District in the development of a Line Clearance Qualified Arborist program to develop new frontline contractor workforce. The initiative has a major worker and wildfire safety component. Lastly, Wildfire Mitigation training is provided annually to all frontline leaders and frontline workers.

1.2.2 – 2022: 4, 2023: 4, 2024: 4

**To what extent are training and support resources available to frontline workers to improve their wildfire safety skills?**

Frontline workers receive job specific wildfire safety training and support resources are made available to them to improve their wildfire safety skills. Annually, employees are trained on Wildfire Mitigation practices and processes. Some examples of training provided to frontline workers to improve their wildfire safety awareness and knowledge include annual PSPS tabletop exercises, Virtual Reality training around PSPS process and roles, and Electric Standard Practice No. 113.1 (ESP 113.1) which specifically addresses wildland fire prevention. Fire safety trainings are also provided for all electric field employees along with Vegetation Management field employees. Periodic joint inspections between SDG&E and Cal Fire and SED are performed for regulatory compliance and adherence to wildfire safety standards.

1.2.3 – 2022: 4, 2023: 4, 2024: 4

**What are the personal safety and wildfire-specific training requirements of contractors?**

All contractors are required to meet minimum personal safety and wildfire-specific training requirements in addition to site-specific orientation. Examples of such training include hazard awareness training, fire prevention and preparedness, identifying infractions, environmental regulations, review of written safety programs, and review of patrol processes. In addition, SDG&E requires that contractors and consultants develop internal company fire plans, undergo annual wildland fire prevention training, and that they follow SDG&E's ESP 113.1. SDG&E Safety Services performs observations of contracted workforce (e.g., compliance with wildfire safety procedures, proper fire PPE, and knowledge of SDG&E and internal company fire plans). Contractor employee specific training requirements are also verified through observing contractor employees performing specific tasks and then following up with the contractor requesting the training documentation. Training documentation is reviewed to meet requirements. Where training gaps are identified, SDG&E communicates them with the contractor and tracks them through correction.

## 1.3 REWARDS AND RECOGNITION

1.3.1 – 2022: 3, 2023: 4, 2024: 4

**To what extent do rewards and incentives for operational leaders and workers support safety and mitigating wildfire hazards?**

Rewards and incentives for operational leaders and workers support safety and mitigating wildfire hazards. The incentive compensation plan (ICP) emphasizes lagging goals such as number of ignitions, vegetation contacts, and wildfires caused by the utility. The ICP structure also emphasizes leading goals such as near misses, field safety observations, and resolving infractions. In addition to ICP, operational leaders and workers can be recognized and rewarded for creative ideas that improve our culture and strategic innovations that change the way we operate. The Energy with Purpose Recognition program

celebrates the ways our employees do the right thing, champion people, and shape the future, including safety-related matters. Many mechanisms have been established to encourage and solicit creative and innovative ideas such as Wildfire Safety Challenge Sessions for leadership and Double Down Input Sessions at operating districts. SDG&E also recognizes safety-champions who are nominated and selected for demonstrating safety best practices and going above and beyond safety expectations. The Grant Valentine and Gary Tehan awards were developed to recognize these individuals and are awarded annually. Furthermore, SDG&E's transmission and substation Voluntary Protection Program allows for a safety incentive program where employees may be nominated for points based on proactive safe behaviors outside of job duties, which they can then redeem for rewards. Nominees are showcased in the "caught in the act" recognition program and highlighted on a DigiBoard.

## 2.1 SENIOR LEADERSHIP ACCOUNTABILITY

2.1.1 – 2022: 4, 2023: 4, 2024: 4

### **Who is accountable for wildfire safety outcomes?**

At SDG&E, safety is a core value. Every employee is accountable for wildfire safety outcomes in addition to their own personal safety and the safety of others. The entire executive leadership team is accountable to SDG&E's Board of Directors, including its Safety Committee, for wildfire safety outcomes. Moreover, SDG&E's Chief Safety Officer, with input from the Director of Safety, focuses on and is accountable for safety outcomes. Safety metrics, including both leading and lagging safety indicators are key components of every executive's compensation and incentive structure. Additionally, leadership and employees can discuss and share wildfire safety and overall safety culture through the Executive Safety Council and Wildfire Council.

2.1.2 – 2022: 4, 2023: 4, 2024: 4

### **Who is accountable for personal safety outcomes?**

At SDG&E, safety is a core value. Every employee is responsible and accountable for their personal safety and the safety of others. Safety is a condition of employment. Working safely and looking out for the safety of our employees, contractors, customers, and the community is the responsibility of each employee. The entire executive leadership team is accountable to SDG&E's Board of Directors, including its Safety Committee, for personal safety outcomes. Moreover, SDG&E's Chief Safety Officer, with input from the Director of Safety, focuses on and is accountable for safety outcomes. Safety metrics, including both leading and lagging safety indicators are key components of every executive's compensation and incentive structure. Additionally, leadership and employees can discuss and share wildfire safety and overall safety culture through the Executive Safety Council and Wildfire Council.

2.1.3 – 2022: 3, 2023: 4, 2024: 4

### **Rate the types of wildfire safety indicators and objectives tracked by senior operational leadership.**

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, SDG&E employs internal Forester Patrollers whose primary role is to perform off-cycle, hazard tree inspections throughout the year within the HFTD. Another example is SDG&E's bi-annual employee Safety Barometer Survey which includes 4 questions specific to wildfire mitigation that measure how employees 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. The Fire Potential Index (FPI) and meteorology reports are shared

daily across the organization and are used to inform operational decisions. Vegetation Management performs a minimum of two separate regulatory compliance and hazard tree inspections annually throughout the HFTD. Patrols are scheduled, tracked, documented, and reported through this activity. Additional ongoing inspection activities within the HFTD (e.g., DIAR, District, CMP inspections) inform the respective departments where mitigation action is required for regulatory and fire prevention response. Outage incidents are investigated, tracked, and reported to senior operational leadership for regulatory reporting, and as a measure of safety and ICP goals. Wildfire Council, Fire Directors Steering Team, Electric Safety Subcommittee, and the Safety Committee of SDG&E's Board of Directors are utilized to share and communicate wildfire safety measures and objectives at every level of the organization.

## 2.2 METRICS AND TARGETS

2.2.1 – 2022: 4, 2023: 4, 2024: 4

### **How effective are wildfire safety metrics in providing insight into critical areas of risk?**

Wildfire safety measures are highly effective in providing data and critical exposure area trends, as well as actionable insight. For example, in its enhanced vegetation management (EVM) program, SDG&E tracks outages caused by vegetation and then identifies specific species to target with enhanced clearances. Wildfire risk components like outages and tree data are used to develop a Vegetation Risk Index and Circuit Risk Index which identifies risk areas and is used in PSPS decision making. Additionally, components like ignition, outage, tree, asset data are used as inputs in the WiNGS Planning model to inform the grid hardening strategy in critical areas and on critical assets in the HFTD. Other examples include specific equipment replacement programs identified by trends such as expulsion fuse replacement, lightning arrestors, reconductor programs, strategic undergrounding (SUG), and applying covered conductor. The drone inspection program has evolved into a risk-based program where wildfire safety metrics and asset data are used to build a prioritization model, which aids in identifying distribution assets for inspection. In addition, SDG&E's system protection advancement allows for detection of failing equipment prior to an outage as part of iProtect.

2.2.2 – 2022: 4, 2023: 4, 2024: 4

### **How frequently does the senior safety team monitor and adjust actions and strategies related to wildfire safety?**

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, at multiple regular meetings -- e.g., Fire Director Steering Committee meetings, the meetings of the Safety Committee of SDG&E's Board of Directors and Wildfire Council meetings -- leaders discuss and are held accountable for wildfire safety, mitigation action items, and follow-ups on fire issues or leading indicators. SDG&E emphasizes outreach, interaction, input from our community at the quarterly Wildfire Safety Community Advisory Council meetings with community safety partners to continue adjustments to wildfire safety strategies where deemed necessary. Several Joint IOU meetings to address various categories of wildfire mitigation work, such as, vegetation management, grid hardening, public outreach, and various others help advance continuous adjustments.

2.2.3 – 2022: 4, 2023: 4, 2024: 4

### **To what extent are wildfire safety metrics communicated throughout the organization?**

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, and Wildfire Safety Fairs in the back country.

## 3.1 EVENT INVESTIGATION

3.1.1 – 2022: 3, 2023: 4, 2024: 4

### **What types of adverse events are investigated using root cause analysis?**

SDG&E investigates all incidents determined to have Serious Injury or Fatality (SIF) potential (per the Edison Electric Institute classification model). SDG&E also investigates near misses, although some near miss reports may be anonymous or information is not available, so there are times when a root cause analysis (RCA) may be limited. SDG&E's Asset Management team performs proactive equipment failure analysis. When equipment failures occur, SDG&E documents and tracks Equipment Failure Reports (EFRs) and has improved the EFR program. SDG&E's Electric Distribution Engineering (EDE) team performs RCAs for all catastrophic equipment failures. SDG&E has implemented a Joint Electric Operations Enhancement Program (JEOEP), a collaboration between Electric Regional Operations, Electric Distribution Operations, Field Service Delivery and Emergency Management teams, which serves as an event learning team. Additionally, the Ignition Management Program tracks ignitions and potential ignitions and performs on site and follow up analysis including SME groups to detect correlations.

3.1.2 – 2022: 3, 2023: 4, 2024: 4

### **Rate the quality of event investigations.**

SDG&E's event investigations focus on identifying the cause of the exposure and describing actions to control the exposure. The quality of investigations has improved at SDG&E. SDG&E holds regular investigation review meetings to learn and share the incidents. Also, the incident learnings are shared at larger sub-committees on the gas and electric side. Following each safety incident review meeting, key teachings, lessons learned, and corrective actions are compiled and circulated for broad awareness and are uploaded and made available in a SharePoint Site accessible to all employees. Similarly, After-Action Review/Improvement Planning Reports (AAR/IP) are shared for event learnings. The Ignition Management Program (IMP) has developed a process for reporting evidence of heat events. This process is published in ESP1219 Electric Incident Investigation and training efforts are underway across Electric Regional Operations (ERO). Personnel submitting evidence of heat for an incident are recognized and celebrated, advancing SDG&E's overall safety culture. In addition, SDG&E fire coordinators follow up on site and consult with SME on all OEIS and CPUC reportable fires (defined by Regulation 29300 which was formally implemented in 2023).

3.1.3 – 2022: 3, 2023: 4, 2024: 4

### **What happens with investigation results?**

SDG&E reviews all significant incidents and activations to identify potential improvements and establish a comprehensive and measurable After-Action Report (AAR). SDG&E's AAR program aligns and integrates the processes within 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. Incident investigation results, corrective actions, and lessons learned are shared regularly at the larger sub-committee meetings on the electric and gas side and with learning teams. One example demonstrating how results affect organizational change is the creation of a new Aviation Services Safety Officer.

## 3.2 HAZARD RECOGNITION

3.2.1 – 2022: 4, 2023: 4, 2024: 4

### **What kind of process is used by frontline workers to recognize and report wildfire hazards?**

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, as well as the public and contractors, by providing a safe operating and construction environment. These programs 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 inspections throughout the HFTD, patrols prior to RFW days, and post-PSPS patrols prior to restoration of outages. SDG&E also utilizes the Ignition Management Program to gather information on ignitions and near ignitions. SDG&E's Near Miss application was also enhanced to include an option for frontline workers to report "Potential for Fire Ignition." Annual ESP 113.1 training and monthly newsletter are some of the ways SDG&E communicates and shares takeaways across the organization. SDG&E has also established mechanisms to encourage and solicit creative and innovative ideas such as Double Down Input Sessions at operating districts.

## 3.3 ANTICIPATION, RESILIENCE, AND LEARNING

3.3.1 – 2022: 4, 2023: 4, 2024: 4

### **What structures, systems, and/or processes have been established to encourage sensitivity to weak signals of wildfire hazards?**

SDG&E has systems and processes to make observations, to report, and to mitigate wildfire hazards. For example, the Ignition Management Program includes a process in which electric troubleshooters (ETS) in the field report evidence of heat events to better educate mitigation owners and report OEIS defined fires. Additionally, the Electric Risk Analysis (ERA) Team, PSPS pre-patrols, drone inspections, and vegetation patrols exemplify processes to help identify fraying, strain or abrasion on wires or wind contact.

3.3.2 – 2022:4, 2023: 4, 2024: 4

### **What steps are taken to ensure frontline supervisors and workforce can respond quickly to upset conditions?**

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.

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, has been instrumental to prepare our Operations workforce for an all-risk, all-hazard approach to emergency and wildfire response. Additionally, under Electric Regional Operations, training and exercises are conducted annually to reinforce Storm, Fire, and PSPS responses. This entails drilling various roles to support these events including DOC-E, Resource Coordination, and Prioritization team. In addition, SDG&E enacted a Joint Electric Operations Enhancement Program (JEOEP) initiative quartering early 2023, consisting of a collaboration between Electric Regional Operations, Electric Distribution Operations, Field Service Delivery and Emergency Management teams to continue to drive performance and response. Lastly, our crew management system (ARCOS) was enhanced with a Rapid Activation module to include additional workforce groups and teams to quickly activate and stand-up resources in a unified structure.

In conjunction with the training and planning components of SDG&E's response, SDG&E also utilizes a 24/7 Fire Coordination On Duty staff member, who has the responsibility to monitor first responder dispatches, communicate with/coordinate SDG&E resources, and respond to fire and other emergency incidents as needed. This Fire Coordinator is a former firefighter experienced in emergency response and regularly trains with first responder agencies to ensure effective coordination between SDG&E and incident command.

3.3.3 – 2022: 3, 2023: 4, 2024: 4

#### **What processes and structures have been established to create a learning organization?**

SDG&E operates within a Company-wide Safety Management System (SMS) focused on fostering a learning environment to enable continuous safety improvement. SDG&E has implemented several programs and processes to enhance SDG&E's commitment to being a learning organization and sharing safety-related best practices and lessons learned throughout the organization. This includes sharing safety reminders based on data trends and observations. For example, SDG&E's Serious Injury & Fatality prevention, Behavior Based Safety/safety observations, and the Safety Barometer and Engagement Surveys, are all programs committed to implementing safety-related best practices company-wide to create a strong safety culture and place the highest priority on employee, contractor, customer, public safety and continuous learning and improvement.

Each week, SDG&E leadership (typically SDG&E's Chief Safety Officer with rotating Officer messages) sends a company-wide safety message highlighting best practices, lessons learned and proactive safety reminders. Operational teams use this message in weekly safety "tailgates" or "dock talks" in the field. SDG&E leadership and management hold regular Safety Incident Review Meetings where safety incidents and near misses that had the potential to cause serious injury or fatality are reviewed for lessons learned, corrective actions and safety improvements. These meetings focus on improvements and do not place any blame. Following each meeting, key takeaways, lessons learned, and safety improvements are shared with cross-functional teams and are posted to a Company-wide SharePoint page accessible to all employees. Since the 2022 Safety Culture Assessment, SDG&E has implemented additional practices to routinely share best practices and lessons learned with its employees and contractors. For example, starting in April 2023, a Weekly Near Miss Summary Report is circulated to all employees highlighting key teachings and safety reminders based on the prior week's near miss submissions. SDG&E's Electric Safety Center sends weekly safety messaging and bi-weekly reports incorporating safety best practices, lessons learned and proactive safety reminders. SDG&E's Contractor Safety team sends monthly Contractor safety newsletters and reports, and regular Incident Debriefs.



SDG&E's Emergency Management team implemented an After-Action Review process where all emergency activations and incidents are reviewed for lessons learned and corrective actions. Together, these processes routinely share best practices, lessons learned and safety knowledge to SDG&E's workforce.

## 3.4. ASSURANCE

3.4.1 – 2022: 4, 2023: 4, 2024: 4

### **What types of safety audits are used for activities related to wildfire hazard mitigation?**

SDG&E performs internal audits on programs and departments that include wildfire hazard mitigation within their scope. For instance, 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, SDG&E's Distribution System utilizes Light Detection and Ranging (LiDAR) data to perform post-construction survey and pre-construction design specifications. There is also a Contractor Safety Services audit of contractor oversight, which focuses on controls to ensure compliance with safety and environmental policies and procedures, and programs to mitigate incidents and injuries. An Aviation Services audit included all flights scheduled by SDG&E for contractor-provided helicopters, leased helicopters, and SDG&E's Unmanned Aircraft System (UAS) operations, including those performed by licensed SDG&E personnel and third-party UAS service providers. UAS operations significantly increased over the past two years primarily due to the Drone Investigation, Assessment, and Repair (DIAR) Program, which is part of SDG&E's Wildfire Mitigation Plan efforts.

3.4.2 – 2022: 3, 2023: 3, 2024: 4

### **How are the findings from safety audits of activities related to wildfire mitigation tracked to closure?**

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. 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. Corrective actions are incorporated into training exercises, when applicable, to validate effectiveness and to test implementation. Additionally, those findings are included in future audits as items of interest to ensure appropriate follow up. SDG&E's SMS developed a safety audit process, which will include validating effectiveness of corrective actions, to be implemented in 2024.

# Supporting Document 2: 2023 SDGE Safety Culture Management Self-Assessment SUBMISSION.xlsx

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2. Rate where the organization plans to be by the end of 2024. Indicate where the organization plans to be on each of the questions by the end of 2024 by writing "2024" in the appropriate cell. If the organization has no plans to progress on a specific item (or is already at the top level), add "2024" to the cell where you entered "2023."

3. Provide your justification for your 2023 self-rating in 1-3 sentences or <100 words.

Dimensions		Rating Levels				Justification
		(1) Public compliance	(2) Private compliance	(3) Stewardship	(4) Citizenship	
<b>Organizational Sustaining Systems</b>		(1) Public compliance	(2) Private compliance	(3) Stewardship	(4) Citizenship	Justification for your 2023 self-rating in 1-3 sentences or <100 words
1.1.1	To what extent is wildfire safety performance integrated into leadership selection/promotion decisions?	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 selection / promotion decisions	Excellent personal and wildfire safety performance are necessary for advancement; poor safety performance eliminates leader from selection/promotion	<i>Insert justification</i>
	<b>Ratings</b>				2023, 2024	
1.1.2	How are wildfire safety responsibilities integrated into frontline supervisors' goals and objectives?	No annual goals or objectives related to wildfire safety	Goals and objectives focus only on lagging indicators for wildfire or personal safety related to wildfire mitigation work	Goals and objectives contain a mix of leading 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 frontline supervisor's visible engagement in and support of wildfire and personal safety programs and initiatives	<i>Insert justification</i>
	<b>Ratings</b>				2023, 2024	
1.1.3	To what extent is safety and the ability to work safely incorporated into position descriptions and expectations?	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 that each employee has to speak up and intervene if unsafe conditions exist, both for wildfire and personal safety	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	<i>Insert justification</i>
	<b>Ratings</b>				2023, 2024	
				Job-specific wildfire		<i>Insert justification</i>

Introduction Maturity Level Options **1 Mgmt Self-Assmt 2023-24** 2 Summary Plan 3.1 Objectives (12 Months) 3.2 Objectives (3 Years)

Ready Accessibility: Investigate

## 2023 Safety Culture Assessment Management Self-Assessment, Safety Culture Objectives & Lessons Learned (for IOUs)

The management self-assessment is a component of the 2023 Safety Culture Assessment for Electrical Corporations. Energy Safety uses the management self-assessment, a detailed assessment of organizational systems, to evaluate the organizational culture of the larger, more complex electrical corporations over time. Please see below for an overview of the Management Self-Assessment:

### **Section 1: Management Self-Assessment**

The management self-assessment presents 22 management self-assessment questions where each large IOU must indicate its (1) expected status of various elements of its safety culture at present, (2) expected status at the end of 2024, and (3) justification for each response.

### **Section 2: Summary Plan for 2024**

The self-assessment also includes a summary plan for the coming year. You can provide up to 20 points of actions in this section.

### **Section 3: Safety Culture Objectives, Lessons Learned, and 2022 Recommendations**

Energy Safety also tracks each electrical corporation's organizational culture by requesting the corporation's 12-month and 3-year safety culture objectives, any lessons learned since the corporation's last safety culture assessment, and the corporation's reporting on implementation of recommendations.

### **Section 4: Supporting Documentation**

Any supplementary files the corporation wishes to provide that are not captured in the previous sections of this assessment (e.g., quarterly newsletters, brochures) can be uploaded in this section.

### **Section 5: Contributors**

This section is for submitting the information about the contributors to this assessment. Please make sure that all contributors' information are included in this section.

**Supporting Document 2: 2023 SDGE Safety Culture Management Self-Assessment SUBMISSION.xlsx**  
**Sheet "Maturity Level Options"**

**Management Self-Assessment: Maturity Levels**

Please see the maturity level options below.

<b>(1) Public compliance</b>	<b>(2) Private compliance</b>	<b>(3) Stewardship</b>	<b>(4) Citizenship</b>
<p>Safety is viewed as an external requirement. Safety-supporting behaviors are not intrinsically motivated. Also, the utility does not incorporate safety-supporting protocols where not required by law.</p> <p>"I need to make sure I'm following safety procedures when management is looking, even though they are a burden."</p>	<p>Safety is viewed as a personal priority, though may be routinely susceptible to competing pressures.</p> <p>"I choose to be safe: safety procedures are there to protect me. It is my responsibility to follow them."</p> <p>Supervisors may react to injuries or incidents rather than focusing on exposure control.</p>	<p>Individually directed safety citizenship. Workers see wellbeing and public safety as having intrinsic worth and take action to make their teams safer.</p> <p>"To stay safe as a team, we need to look out for one another."</p> <p>Supervisors may seek to understand exposures, weak signals, and performance consistency.</p>	<p>Organizationally directed safety citizenship.</p> <p>Safety is inherent within the organizational identity creating sensitivity to subtle changes in exposure.</p> <p>"Safety is a core part of everyone's job. It is a shared responsibility. We strive to improve ourselves and learn from our collective mistakes."</p> <p>The culture is inclusive, caring, and trusting. Safety leadership is broad and learning-oriented, with governance that is highly effective and systematic.</p>

See the 2023 SCA Guidelines for more definitions of key terms used in the Management Self-Assessment  
<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53626&shareable=true>  
 (accessed June 22, 2023)

**Supporting Document 2: 2023 SDGE Safety Culture Management Self-Assessment SUBMISSION.xlsx**  
**Sheet "1 Mgmt Self-Assmt 2023-24"**

**Section 1: Management Self-Assessment**

1. Rate the organization's current status in 2023. Indicate which cell represents the status of the organization today for each question by writing "2023" in the appropriate cell.
2. Rate where the organization plans to be by the end of 2024. Indicate where the organization plans to be on each of the questions by the end of 2024 by writing "2024" in the appropriate cell. If the organization has no plans to progress on a specific item (or is already at the top level), add "2024" to the cell where you entered "2023."
3. Provide your justification for your 2023 self-rating in 1-3 sentences or <100 words.

Dimensions	Rating Levels				Justification	
	(1) Public compliance	(2) Private compliance	(3) Stewardship	(4) Citizenship		
<b>Organizational Sustaining Systems</b>	(1) Public compliance	(2) Private compliance	(3) Stewardship	(4) Citizenship	Justification for your 2023 self-rating in 1-3 sentences or <100 words	
1.1.1	To what extent is wildfire safety performance integrated into leadership selection/promotion decisions?	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 selection / promotion decisions	Excellent personal and wildfire safety performance are necessary for advancement; poor safety performance eliminates leader from selection/promotion	<i>Insert justification</i>
	<b>Ratings</b>				<b>2023, 2024</b>	
1.1.2	How are wildfire safety responsibilities integrated into frontline supervisors' goals and objectives?	No annual goals or objectives related to wildfire safety	Goals and objectives focus only on lagging indicators for wildfire or personal safety related to wildfire mitigation work	Goals and objectives contain a mix of leading 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 frontline supervisor's visible engagement in and support of wildfire and personal safety programs and initiatives	<i>Insert justification</i>
	<b>Ratings</b>				<b>2023, 2024</b>	
1.1.3	To what extent is safety and the ability to work safely incorporated into position descriptions and expectations?	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 that each employee has to speak up and intervene if unsafe conditions exist, both for wildfire and personal safety	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	<i>Insert justification</i>
	<b>Ratings</b>				<b>2023, 2024</b>	
1.2.1	To what extent are training and support resources available to frontline supervisors to improve their safety leadership skills?	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 "Stewardship" option are met; In addition, training includes advanced safety topics such as exposure management, and human performance reliability	<i>Insert justification</i>
	<b>Ratings</b>				<b>2023, 2024</b>	

1.2.2	To what extent are training and support resources available to frontline workers to improve their wildfire safety skills?	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 "Stewardship" option are met; In addition, training includes advanced safety topics such as human performance reliability	<i>Insert justification</i>
	<b>Ratings</b>				2023, 2024	
1.2.3	What are the personal safety and wildfire-specific training requirements of 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	<i>Insert justification</i>
	<b>Ratings</b>				2023, 2024	
1.3.1	To what extent do rewards and incentives for operational leaders and workers support safety and mitigating wildfire hazards?	No rewards or incentives specific to safety or 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 mitigation activities	Rewards and incentives focus on leadership activities such as reporting wildfire concerns, generating innovative ideas to reduce wildfire hazards, and approaching others about safety concerns	<i>Insert justification</i>
	<b>Ratings</b>				2023, 2024	

**Structure and Governance**

						Justification
		(1) Public compliance	(2) Private compliance	(3) Stewardship	(4) Citizenship	
2.1.1	Who is accountable for wildfire safety outcomes?	Not defined	Safety department	Operational leadership and Safety Department	Executive leadership with Safety Department as trusted advisor	<i>Insert justification</i>
	<b>Ratings</b>				2023, 2024	
2.1.2	Who is accountable for personal safety outcomes?	Not defined	Safety department	Operational leadership and Safety Department	Executive leadership with Safety Department as trusted advisor	<i>Insert justification</i>
	<b>Ratings</b>				2023, 2024	
2.1.3	Rate the types of wildfire safety indicators and objectives tracked by senior operational leadership.	No wildfire safety objectives	Leading and lagging wildfire safety indicators required to be reported for regulatory purposes	Required safety measures for regulatory purposes. Additional leading indicators used for wildfire mitigation work that are aligned with actionable initiatives	Required safety indicators. Additional leading indicators used for wildfire mitigation work that are aligned with actionable initiatives at each level of the organization	<i>Insert justification</i>
	<b>Ratings</b>				2023, 2024	
2.2.1	How effective are wildfire safety metrics in providing insight into critical areas of risk?	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, critical exposure area trends, and actionable insights	<i>Insert justification</i>
	<b>Ratings</b>				2023, 2024	
2.2.2	How frequently does the senior safety team monitor and adjust actions and strategies related 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	<i>Insert justification</i>
	<b>Ratings</b>				2023, 2024	

2.2.3	To what extent are wildfire safety metrics communicated throughout the organization?	Safety metrics are not shared	Lagging indicators for wildfire outcomes are posted at local/site operations	Lagging and leading measures for wildfire safety are posted and discussed in regular management and supervisor meetings	Lagging and leading indicators for wildfire safety are discussed; individual/team contributions to leading indicators are highlighted and recognized publicly	<i>Insert justification</i>
<b>Ratings</b>					2023, 2024	

Safety Enabling Systems					Justification	
		(1) Public compliance	(2) Private compliance	(3) Stewardship	(4) Citizenship	

3.1.1	What types of adverse events are investigated using root cause analysis?	Only fatal or serious incidents required to be reported to OSHA, CPUC reportable ignitions, or incidents required to be reported to Energy Safety (pursuant to Cal. Code Regs. title 14, Section 29301)	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 teams evaluate high risk situations for proactive opportunities to reduce exposure	<i>Insert justification</i>
<b>Ratings</b>					2023, 2024	

3.1.2	Rate the 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	<i>Insert justification</i>
<b>Ratings</b>					2023, 2024	

3.1.3	What happens with investigation results?	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; lessons learned are shared throughout the organization	Systemic approach to tracking/closing actions using high value controls; lessons learned leveraged broadly across the organization to effect change and control exposure (e.g., leading to procedural or policy changes throughout organization where applicable)	<i>Insert justification</i>
<b>Ratings</b>					2023, 2024	

3.2.1	What kind of process is used by frontline workers to recognize and report wildfire hazards?	No formal process	Process exists to report wildfire hazards but no training or feedback	Process established, workforce is trained in the process, and it is communicated widely; there is consistent follow-up to reduce exposure	Process established and communicated for wildfire hazard reporting; workforce is trained in the process and encouraged to report wildfire hazards; results broadly shared across the organization to spur learning and exposure reduction	<i>Insert justification</i>
<b>Ratings</b>					2023, 2024	

3.3.1	What structures, systems, and/or processes have been established to encourage sensitivity to weak signals of wildfire hazards?	No formal process or structure	Workforce is encouraged to report wildfire hazards as it sees them	System established for reporting and mitigating wildfire hazards; frontline supervisors encourage reporting of weak signals	A cross-functional team is established to proactively look for, track, and mitigate wildfire hazards and potential black swan situations	<i>Insert justification</i>
<b>Ratings</b>					2023, 2024	

3.3.2	What steps are taken to ensure frontline supervisors and workforce can respond quickly to upset conditions?	No formal training or preparation	Common upset conditions have been identified and response protocols are reviewed regularly	Simulations and drills 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	<i>Insert justification</i>
<b>Ratings</b>					2023, 2024	

3.3.3	What processes and structures have been established to create a learning organization?	Few processes, training or structures have been established for sharing safety-related lessons learned across the organization	The organization has implemented a knowledge management system for sharing safety-related best practices and incidents throughout the organization	All criteria met in "Private Compliance" option, plus processes exist for systematically using the knowledge management system and implementing safety-related best practices	All criteria met in "Stewardship" option, plus these processes for tapping best practices in knowledge management system are used routinely and by nearly everyone	<i>Insert justification</i>
<b>Ratings</b>					2023, 2024	<i>Insert justification</i>
3.4.1	What types of safety audits are used for activities related to wildfire mitigation?	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 level of wildfire risk present	Systemic and rigorous self, independent, and internal audits conducted and used for alignment, calibration, and learning	<i>Insert justification</i>
<b>Ratings</b>					2023, 2024	<i>Insert justification</i>
3.4.2	How are the findings from safety audits used for activities related to wildfire mitigation tracked to closure?	No formal tracking mechanism	Self-tracking of closures; no verification	Audit findings tracked and verified to closure	Audits tracked, implementation verified to closure, and effectiveness validated	<i>Insert justification</i>
<b>Ratings</b>				2023	2024	



**Supporting Document 2: 2023 SDGE Safety Culture Management Self-Assessment SUBMISSION.xlsx  
Sheet "2 Summary Plan"**

**Section 2: Summary Plan for 2024**

In the table below, provide a summary action plan for the work that is planned in 2023 to achieve your 2024 targets indicated in the Management Self-Assessment.

A. Action/Activity	B. Deadline	C. Management Self-Assessment Reference(s). Indicate which question(s) this activity links to.
[Action or activity - brief description]	[Date in 2024]	[Question number, e.g., 1.1.1]
Implement SDG&E's developed "Process for Completing Audit Plans of the Safety Management System" which encompasses risk prioritization and validating effectiveness of implemented corrective actions for continuous improvement. SDG&E's safety dashboard can be utilized to analyze trends in leading and lagging safety indicators as a general measure of effectiveness pre- and post-implementation. Implementation roadmap will be developed by July 2024.	07/31/2024	3.4.2
Explore the use of a centralized repository for safety-related audits, lessons learned and corrective actions.	7/31/2024	3.4.2

**Supporting Document 2: 2023 SDGE Safety Culture Management Self-Assessment SUBMISSION.xlsx**  
**Sheet “3.1 Objectives (12 Months)”**

**Section 3: Safety Culture Objectives, Lessons Learned, and 2022 Recommendations**

**Safety Culture Objectives**

**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 and/or risk to employees conducting wildfire mitigation work
[Objective]	[Metrics]	[12-month target]	[Description]
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	300	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. SDG&E is focusing not only on the number of near miss report submissions, but the quality, type and follow-up of submitted reports.
	Environment and safety compliance management program (ESCMP) Findings Mediated	100%	SDG&E's ESCMP allows SDG&E to document safety incidents (including wildfire safety incidents) in the system of record and an action plan is identified and tracked through completion in a timely manner.
	Number of Employee Safety Observations	17,178	Safety observations, supervisors/leaders observing field crews, and peer-to-peer 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 and provide employees an opportunity to discuss safety issues with field leadership. 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.
	Number of Contractor Safety Observations	12,000	Safety observations of third-party contractors (including those performing wildfire mitigation (e.g., vegetation management) 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. This collaboration between SDG&E and its contractors help move the safety culture forward and ultimately improve safety performance of contractors working on behalf of SDG&E.
	Annual PPS Training for Electric Regional Operations	100% of ERO personnel	Electric Regional Operations is required to complete an annual PPS training course to assist in preparedness for fire season and PPS protocols. The training objectives of this course are to: define roles/responsibilities of patroller and observer, identify types of required fire equipment for the FPI, describe pre- and post-patrols structure and responsibilities, outline damage reporting requirements, explain damage submitlta process and required documentation, identify 2023 staging areas, and promote safe work practices.

**Supporting Document 2: 2023 SDGE Safety Culture Management Self-Assessment SUBMISSION.xlsx**  
**Sheet “3.2 Objectives (3 Years)”**

**Section 3: Safety Culture Objectives, Lessons Learned, and 2022 Recommendations**

**Safety Culture Objectives**  
**Objectives for the next 3 years**

**Safety Culture Objectives**  
**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 3 years from submission	D. Description of how this objective will reduce wildfire risk to the public and/or risk to employees conducting wildfire mitigation work
[Objective]	[Metrics]	[3-year target]	[Description]
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	2025 target - 20/year	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) potential assessments completed	2025 target - Review all incidents (near misses/injuries/motor vehicle incidents) and determine all which have SIF potential; for those that do and for which adequate information is available, 100% will be investigated and analyzed, and preventative actions generated where necessary (excluding incidents that are out of employer's control)	Assessing Near Miss incidents and Safety Incidents for the potential to have caused serious injury or fatality. Of those incidents assessed and determined to have SIF-potential, including wildfire-related incidents, perform a root cause analysis/in-depth investigation to allow for identification of corrective actions and/or preventative actions to reduce risk and exposure, and broad sharing of lessons learned.
	Number of near misses	2025 target 300-400	Near miss reports allow SDG&E to communicate, assess, 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	2025 target 18,000-20,000	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	2025 target 15,500-17,000	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 observation of at-risk behaviors and recognition of safe behaviors help move safety culture forward and ultimately improve safety performance for contractors performing work on behalf of SDG&E.
	Environment and safety compliance management program (ESCMP) Findings Mediated	100% is always the target	SDG&E's ESCMP allows SDG&E to document safety incidents (including wildfire safety incidents) in the system of record and an action plan is identified and tracked through completion in a timely manner.
	After Action Review (AAR) performed	100%	SDG&E performs incident review and de-brief to identify best practices, lessons learned and opportunities for improvement following all emergency operations center activations.

## Section 3: Safety Culture Objectives, Lessons Learned, and 2022 Recommendations

### 3.3 Lessons Learned

**Description of lessons learned since your most recent safety culture assessment:**

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.

A. Major Themes or Lessons Learned	B. Actions Taken
[Theme, lesson in brief]	[Actions taken in response]
<p>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.</p>	<p>Examples of top management demonstrating their leadership and commitment to safety include:</p> <ul style="list-style-type: none"> <li>•SDG&amp;E’s 2023 “Start Strong” office safety event sponsored by the Chief Safety Officer which bussed approximately 1,300 field employees to attend a safety event to set clear leadership goals and expectations, recognize safe behavior, and share important mental health and suicide awareness messages.</li> <li>•Executive Safety Council Meetings – these meetings integrate employee and supervisor dialogue sessions so that employees have an opportunity to share safety experiences directly with Company leadership.</li> <li>•Electric Safety Sub-committee and Electric Safety Center – SDG&amp;E’s Electric Safety Center sends weekly safety messaging and leads monthly Electric Safety Sub-committee meetings where employees gather to discuss safety suggestions, concerns, and track issues through resolution.</li> <li>•SDG&amp;E’s Chief Safety Officer and management participate in Electric Safety Sub-committee, Safety Incident Review Meeting and Behavior Based Safety (BBS) meetings.</li> <li>•Weekly Leadership Safety Messaging – Each Friday, SDG&amp;E’s Chief Safety Officer, or other leadership, sends a company-wide e-mail communication highlighting the safety successes, challenges, and key teachings from the week’s safety incidents, near misses, and observations. This messaging also includes important safety tips and reminders.</li> </ul> <p>2022 Employee Safety Barometer Survey results: Management participation score has shown continuous improvement, from 91.7 in 2018, to 98.3 in 2020, to 98.7 in 2022.</p>

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 enhance supervisor engagement.
- Developed and implemented training curriculum and testing program for supervisors and working foreman to enhance their leadership skills.
- In 2022, SDG&E launched a company-wide Supervisor Training Academy for frontline leaders, focusing on safety, supervisor effectiveness, diversity and inclusion, compliance, employee engagement and culture.

2022 Employee Safety Barometer Survey results: Supervisor participation score has shown continuous improvement, from 90.8 in 2018, to 99.0 in 2020, to 99.2 in 2022.

Employee Involvement: Employee Participation items specify selected actions and reactions that are critical to making a safety program work. Emphasis placed on personal engagement, responsibility, and compliance.

SDG&E increased measures to promote safety awareness and promoted an active role in incident investigations and in identifying and eliminating hazards. For example:

- In 2022, SDG&E experienced an increased number of near miss events reported by contractors and employees. In 2022, 53.4% of the 317 total near miss submissions were anonymous – an approximate 5% improvement from 2021. SDG&E continues to encourage non-anonymous near miss submissions by highlighting the teachings, assessment, follow-up and safety improvements resulting from employee submissions.
- Performing peer-to-peer behavior-based safety observations
- Field employee participation in Electric Safety Subcommittee and Gas Safety Subcommittee
- Highlighted Safety Committee, Cyber Champion and SMS Champion involvement and recognized safety leaders during annual Safety Congress and award ceremony. Hosted first annual “ERO Excellence Awards” recognizing electric employees with exemplary efforts, as nominated by their colleagues.
- Held first annual Line Assistant and Apprentice Summit and Working Foreman Summit for electric workers.

2022 Employee Safety Barometer Survey results: Employee participation score has shown continuous improvement, from 85.3 in 2018, to 95.8 in 2020, to 96.6 in 2022.

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:

- Enhanced new-hire employee orientation and skills training with added safety content; Wildfire safety trainings.
- Electric Safety Subcommittees, Line Assistant and Working Foremen summits
- Annual Safety Congress and award ceremony, ERO excellence awards, 2023 Start Strong offsite safety event
- In 2022, SDG&E launched of a new tool for air quality notifications where supervisors receive automatically generated alerts via email and text when the Air Quality Index (AQI) reaches regulated thresholds.
- 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 volunteer front-line employees (employee-led and management-supported).

2022 Employee Safety Barometer Survey results: Safety Support Activities score shows continuous improvement, from 89.0 in 2018, to 96.9 in 2020, to in 98.0 in 2022.

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: BAPP/BBS, Near-Miss Reporting).

- SDG&E solicits feedback, safety concerns and safety suggestions from its workforce during regular meetings (e.g., Electric Safety Subcommittee) and encourages near miss submittals. SDG&E also surveys its workforce via Employee Engagement and Safety Barometer surveys and uses the results to develop action plans for continuous improvement. Additionally, SDG&E seeks feedback and any input teams might have around wildfire safety and encourages workers to provide input by sending an email to [WildfireSafetyIdeas@sdge.com](mailto:WildfireSafetyIdeas@sdge.com).

- 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 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. In 2022, SDG&E not only saw an increase in submitted near miss reports (371), but importantly saw advancement in the quality and type of reports. For example, there was an increase in procedural-related and human error-related reports from prior years.

2022 Employee Safety Barometer Survey results: Safety Support Climate score shows continued improvement, from 89.8 in 2018, to 98.6 in 2020, to 99.3 in 2022.

**Supporting Document 2: 2023 SDGE Safety Culture Management Self-Assessment SUBMISSION.xlsx  
Sheet "3.4 2022 Recommendations"**

**Section 3: Safety Culture Objectives, Lessons Learned, and 2022 Recommendations**

**3.4 2022 Recommendations**

**Description of implementation of recommendations from your most recent safety culture assessment:**

Describe the steps taken by the electrical corporation in response to the recommendations from its last Safety Culture Assessment. Include results observed so far, if any.

A. Recommendation	B. Actions Taken	C. Results (if any)
[Exact or paraphrased recommendation from the last Safety Culture Assessment]	[Actions taken in response to recommendation]	[Any results]
<p>1.SDG&amp;E should continue to develop and implement actions to reduce barriers to prioritizing safety over job task goals.</p> <p>2.Leadership should consistently demonstrate to workers that safety is the top priority through words, decision-making, and actions, especially when there is a short deadline or pressures to re-energize to reduce customer impact.</p>	<p>Although SDG&amp;E's 2022 SCA Report was only issued in May 2023, SDG&amp;E continually works to develop and implement actions to demonstrate leadership commitment to prioritizing safety over production. For example, SDG&amp;E has a formalized "Stop Work Authority Process" and is continuing to socialize across all districts and departments to empower workers to "stop the job" whenever deemed unsafe to proceed. Process implementation and messaging starts with messaging from SDG&amp;E's Chief Safety Officer conveying leadership's support to prioritize safety above all else. Stop Work Authority Process steps are summarized in bulletins that are posted across various company locations. Messaging is also promoted during leadership field visits and safety observations. Safety teams are meeting with operational leadership to solicit feedback and any areas of concern.</p>	<p>SDG&amp;E's 2022 Safety Barometer Survey results for the "Management Commitment" section were 98.7%. The specific survey question of "Priority of Safety Relative to Production" scored 98.9%.</p>
<p>1.SDG&amp;E should combine visits whenever possible.</p> <p>2.In addition, SDG&amp;E should better equip frontline workers to handle potentially dangerous interactions with the public environments by:</p> <ul style="list-style-type: none"> <li>•Improving communication to work crews by providing pertinent information about previous incidents at specific job sites and accurate contact information for owners and inhabitants of properties they are visiting.</li> <li>•Providing further de-escalation training to employees.</li> </ul>	<p>Although SDG&amp;E's 2022 SCA Report was only issued in May 2023, SDG&amp;E continually works to mitigate the risk from hostile interactions with members of the public. For example, SDG&amp;E's recently established Field Service Delivery (FSD) organization is focused on enhancing the way our company conducts field work by optimizing processes, resources, and technology from the point of job intake and design through job execution in the field. This would include all gas, electric and service-order based jobs. FSD's primary objectives are to: (1) Streamline our business practices using modern technology tools, and (2) Align our processes to optimize the employee and customer experience by creating a "one stop shop" for all SDG&amp;E field work. Initial implementation in 2023 includes SDG&amp;E's Electric Regional Operations (ERO) organization. On Oct. 31, 2022, FSD launched the new Geocall Electric Pre-Construction Mobile Fielding Application. ERO Construction Supervisors and back-office team members use the mobile fielding app to digitally capture job requirements during pre-construction field work. Additionally, SDG&amp;E's Asset Management team is initiating efforts to optimize routine inspection frequency to avoid duplication/multiple visits to same site. SDG&amp;E has enhanced its public outreach and communication efforts. For example, hosting Wildfire Safety Fairs, leveraging social media and neighborhood sites to educate and notify customers of work in their area, radio, television and online ad campaigns educating our customers on PSPS events, patrols, and restoration processes.</p>	



<p>1. SDG&amp;E should continue to build on its efforts to track trends in safety event related reporting, specifically tracking the quality of near-miss investigations and addressing gaps in its Ignition Management Program.</p> <p>2. SDG&amp;E should continue to focus on tracking trends in near-miss identification, reporting, and investigation. SDG&amp;E should monitor the trend in non-anonymous near miss reporting, as more non-anonymous reporting is an indication of greater safety culture maturity.</p> <p>3. SDG&amp;E should complete actions associated with addressing "Issues with gathering data and getting proper notification from the events that are occurring in the field" by July 31, 2023, the deadline indicated in SDG&amp;E's Summary Plan for 2023.</p> <p>4. SDG&amp;E should continue to address issues and gaps in its Ignition Management Program to increase event investigation quality and share lessons learned broadly across SDG&amp;E.</p>	<p>Although SDG&amp;E's 2022 SCA Report was only issued May 2023, SDG&amp;E continually deploys measures to enhance its Near Miss Reporting by capturing which are reported anonymously and non-anonymously. In addition, SDG&amp;E is exploring ways to encourage reporting near misses non-anonymously in an effort to be proactive about follow up activities and target specific business units for further engagement.</p> <p>The Ignition Management Program (IMP) has developed a process for reporting evidence of heat events. This process is published in ESP1219 Electric Incident Investigation and training efforts are underway across Electric Regional Operations (ERO). Personnel submitting evidence of heat for an incident are recognized and celebrated, advancing SDG&amp;E's overall safety culture. In addition, SDG&amp;E fire coordinators follow up on site and consult with SME on all OEIS reportable fires (defined by Regulation 29300, which was formally implemented in Q1 2023).</p>	<p>YTD, through June 30, 2023, 42% of employee-reported Near Miss Reports are submitted non-anonymously.</p>
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## **Section 4: Supporting Documentation**

**In Qualtrics, you will be directed to upload any additional supporting documentation that would help Energy Safety assess your organizational safety culture (please refer to the actual Qualtrics link for more information).**

## Supporting Document 2: 2023 SDGE Safety Culture Management Self-Assessment SUBMISSION.xlsx Sheet "5 Contributors"



### Energy Safety's 2022 Safety Culture Assessment: Management Self-Assessment

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## 6 Written Comments from SDG&E

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Following are the written comments from SDG&E dated March 8, 2024, “RE: SDG&E Comments on Draft 2023 Safety Culture Assessment Report.”



Laura M. Fulton  
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March 8, 2024

VIA E-MAIL

Suzie Rose  
Program Manager, Electric Safety Policy Division  
Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**RE: SDG&E Comments on Draft 2023 Safety Culture Assessment Report**

Dear Program Manager Suzie Rose:

San Diego Gas & Electric (“SDG&E”) provides the following comments addressing The Office of Energy Infrastructure Safety (“Energy Safety”) and the National Safety Council’s (“NSC”) Draft 2023 Safety Culture Assessment (“SCA”) Report (“the Draft Report”).

**I. INTRODUCTION**

On February 23, 2024, Energy Safety issued the Draft Report and an accompanying letter inviting SDG&E to send written comments to NSC and Energy Safety to clarify factual information in the Report no later than March 8, 2024. SDG&E appreciates NSC and Energy Safety’s efforts leading the 2023 Safety Culture Assessment process, and the opportunity to provide comment to clarify or provide additional context to matters addressed in the Report.

The safety of SDG&E’s employees, contractors, customers, and communities is one of the Company’s top values, and SDG&E is committed to continual consideration of internal and external safety culture assessments to identify opportunities for additional growth. The Draft Report recognizes, “[a]ccording to its Safety Culture Assessment inputs in 2021, 2022, and 2023, SDG&E has exhibited continued commitment to advancing its safety culture maturity.”<sup>1</sup> SDG&E generally welcomes the perspective of the Draft Report in identifying additional opportunities for enhancement of the safety of the Company’s employees, contractors, and the public from wildfire risks. SDG&E offers these written comments for NSC and Energy Safety’s consideration with respect to workforce survey engagement and near miss reporting.

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<sup>1</sup> Draft 2023 Safety Culture Assessment Report at 3.

## II. DISCUSSION

### A. Changes to the Survey Administration Methods in 2023 Should be Considered and Acknowledged When Discussing Workforce Participation

SDG&E acknowledges a lower than usual participation rate amongst individuals identified to participate in the workforce survey, with 59% overall response rate including employees and contractors. Due to the anonymity of survey responders, it is not possible to pinpoint the exact factors that impacted SDG&E's historically low participation rate. However, SDG&E believes the main drivers for the lower participation are due to two primary changes to the SCA process: 1) the shorter engagement time, and 2) the absence of administering paper surveys. These changes impacted survey availability to participants, and, while they were not necessarily negative or unwarranted, merit consideration that a new baseline should apply when comparing participation year-over-year.

The 2023 SCA engagement had an approximate two-week timeframe between notification of the beginning of the SCA engagement period and the survey's opening. In prior years, SDG&E had approximately one month to prepare, create messaging, and socialize the survey with the workforce.

Perhaps more importantly, the elimination of paper surveys in 2023 also affected the ability of most of the frontline workforce, including field employees and contractors, to participate. The frontline workforce—many of whom are directly involved in wildfire safety—has limited access to electronic devices that enable participation in electronic-only surveys. In the aforementioned short timeframe, SDG&E faced several challenges to meet this reality and sought out multiple opportunities to overcome it and make the survey available to the frontline workforce.

First, SDG&E developed and deployed a robust communication plan with the limited timeframe allotted to communicate the importance of the survey and the administration process, including how it differed from previous years. This communication plan included routine messaging from SDG&E's senior leadership, presentations at operational leadership safety meetings and the Electric Safety Subcommittee, and multiple 'roadshow' presentations to various business units throughout the organization. Second, SDG&E made every effort to provide the frontline workforce with access to electronic devices to complete the survey. This effort consisted of obtaining 25 iPad devices and distributing and sharing them amongst 9 operating units across the service territory. SDG&E was unable to provide the iPads to contractor frontline workers due to the compressed timeframe of the survey. Third, SDG&E created and posted a QR code at all operating units in an effort to make the survey more accessible.

SDG&E understands the importance of the workforce survey and resulting indicators of safety culture and will continue to educate and encourage participation from its wildfire mitigation workforce. In future years, SDG&E will continue to improve its efforts to improve employee participation and requests that a longer lead time for preparation, or a routine annual survey schedule, be provided. SDG&E also requests Energy Safety reconsider the electronic-only administration of the workforce survey in 2024 and future years. For the reasons discussed above, SDG&E believes having the paper survey option will increase accessibility and therefore increase overall survey response rates.

### B. Near Miss Reporting

The Draft Report recommends that SDG&E "focus on tracking near-miss reporting trends and learn from them to continually improve safety culture and increase the organization's capacity for psychological safety." (p. 26) SDG&E wholeheartedly agrees and has deployed measures to continually mature as a learning organization and foster a psychologically safe work environment where all

employees and contractors are empowered and expected to look out for one another, speak up, stop work where unsure or unsafe, and report near misses. The Draft Report concludes that SDG&E's 2023 workforce survey results demonstrate opportunity for SDG&E to improve near-miss reporting – specifically encouraging non-anonymous reporting.

SDG&E encourages employees to include their personal identifying details and has implemented recent enhancements to its near miss reporting program, including (1) implementation of a formalized process for consistent review and assessment of submitted reports, (2) enhancements to its company-wide near miss reporting dashboard to provide the high-level status to whether each report is “shared”, “in-progress” or “complete”, and (3) development and issuance of a Weekly Near Miss Summary Report. This Report is sent to all employees on a weekly basis with the objective to:

- Highlight near misses, good catches, and instances of speaking up and looking out for one another.
- Identify key safety reminders and lessons learned for greater hazard awareness.
- Recognize individuals by name, when permission is obtained from the submitter, to positively reinforce safety behavior.
- Provide updates and demonstrate the actions taken following report submission. For example, before and after pictures of resulting safety improvements.
- Provide high level data analysis of near miss reporting trends – categories and anonymous/non-anonymous.
- Demonstrate SDG&E's leadership commitment to proactively identifying and mitigating safety risks and hazards to prevent future incidents.

Additionally, near misses are reviewed and discussed by our operational teams and shared during safety meetings. All Near Miss reports are assessed for the potential to have caused serious injury or fatality (“SIF”). Near Misses with SIF potential undergo further review and may be presented at SDG&E's recurring Safety Incident Review and Learning Meeting. Teachings resulting from those meeting presentations are distributed employee-wide in the form of a Lessons Learned Newsletter.

Importantly, SDG&E has achieved improvements in its Near Miss reporting program that are more qualitative. While more difficult to measure, SDG&E has seen an improvement in the quality of submitted reports. For example, SDG&E achieved its highest number of submitted reports in 2023 with 436 near misses. But those reports included more detail, more description, more instances of employees reporting their own mistakes, and more procedural violations. In 2023, 29% of submitted near misses were procedural-related; 9% were human error-related. SDG&E views this as an improvement over 2021, when only 3% of submissions were procedural-related and 0% were human error-related. These improvements, when taken together, are indicative of building trust and psychological safety amongst our workforce.

### III. CONCLUSION

SDG&E appreciates Energy Safety's consideration of these comments on the Draft 2023 Safety Culture Assessment Report, and requests that these recommendations be taken into account in the final report.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for  
San Diego Gas and Electric Company



