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May 17, 2024

Caroline Thomas Jacobs
Director, Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Docket #2023-SCAs

Re: Liberty Response to Findings of 2023 Safety Culture Assessment

Dear Director Thomas Jacobs:

Liberty Utilities (CalPeco Electric) LLC ("Liberty") appreciates the efforts of the Office of Energy Infrastructure Safety ("OEIS") in preparing the 2023 Safety Culture Assessment for Liberty ("SCA").

Pursuant to California Public Utilities Code Section 8389(e)(2), Liberty agrees to implement the findings of its most recent SCA. Liberty submits the following responses related to the findings in the 2023 SCA and agrees to implement OEIS' recommendations.

Liberty Response Regarding Recommendation to Improve Interpersonal Interactions

Section 3.1 of the March 22, 2024, SCA recommends that "Liberty should continue taking action to improve interpersonal interactions related to safety to help improve overall culture and establish Liberty as a learning organization." This recommendation is a continuation of a 2022 SCA recommendation, and is broken down into two parts:

3.1.1

Improving leadership engagement through training and increased leadership interaction with individual contributors in safety meetings, listening sessions, focus groups, or roundtable meetings.

3.1.2

Continued development of a cross-functional culture committee to gather insights and act regarding declines in workforce survey scores related to overall culture and interpersonal interactions.

The goal of this recommendation is to continue Liberty's progress in collaboratively improving its overall workplace culture and to establish a better sense of trust, respect, and cooperation between employees and Leadership.





Liberty holds twice-monthly safety culture meetings with the leadership team that includes discussions on how to keep all departments and teams engaged and responsible for safety. A safety committee, with representatives from each department within Liberty, has also been established. The safety committee meets every other month to discuss current safety topics and trends that may arise from safety observations, near misses, and good catches that have been recorded by Liberty employees.

In 2024, Liberty will provide safety culture training to all supervisor and above positions with employees reporting directly to them. Liberty also holds monthly safety trainings with field employees attended by leadership to enforce and influence safety culture. Additionally, the Director of Operations holds a Safety Culture meeting to discuss any recent safety near misses, upcoming trainings, and improvements that can be made to safety culture to ensure alignment amongst leadership.

Liberty Response Regarding Recommendation to Increase Engagement in its Workforce Survey

Section 3.2 of the March 22, 2024, SCA recommends that, to improve survey response rates, "Liberty 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.

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

Liberty acknowledges the decrease in both employee and contractor response rates to its 2023 workforce survey compared to its 2022 and 2021 surveys. Liberty has held internal meetings in preparation of the 2024 workforce survey and will utilize a more robust strategy for its 2024 survey that includes earlier communication from multiple members of leadership, stressing the importance of the survey and overall safety culture development.

Please let me know if you have additional questions related to Liberty's efforts to advance its safety culture.

Sincerely,

Jordan Parrillo

Josh Part

Manager, Regulatory Affairs

Liberty