



December 13, 2024

To: Safety Culture Assessment Service List
Subject: Proposed Final Safety Culture Assessment Guidelines

Enclosed is the Office of Energy Infrastructure Safety's (Energy Safety's) Proposed Final Safety Culture Assessment Guidelines.

The Draft Safety Culture Assessment Guidelines were published on November 8, 2024.¹ Opening comments were due on December 2, 2024, and reply comments were due on December 12, 2024. Energy Safety received opening comments from the Joint Utilities (collectively, Pacific Gas and Electric Company, San Diego Gas & Electric, and Southern California Edison) on December 2, 2024.² Energy Safety received reply comments from the California Association of Small and Multi-Jurisdictional Utilities (collectively Bear Valley Electric Services, Liberty Utilities and PacifiCorp) on December 12, 2024.³

Energy Safety made non-substantive edits to Section 3.4, Table 2.1, Table 2.2, and Table 3.4 in the Proposed Final Safety Culture Assessment Guidelines to correct typos and non-substantive errors in the Draft Safety Culture Assessment Guidelines.

The Proposed Final Safety Culture Assessment Guidelines will be considered for adoption during Energy Safety's Safety Culture Assessment Guidelines Adoption Meeting scheduled for December 16, 2024, 1:00 p.m. to 2:00 p.m.

Sincerely,

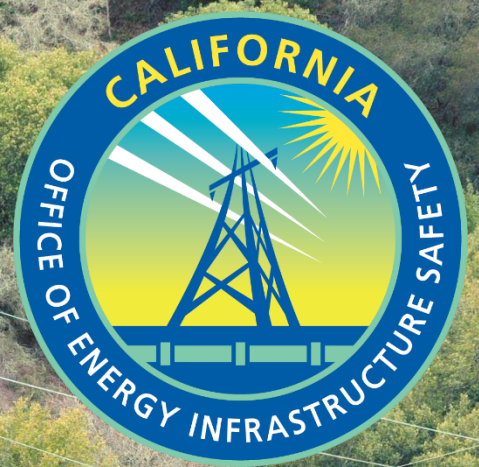
/s/ Suzie Rose

Suzie Rose
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¹ Public Comment Period for and Notice of Public Meeting to Discuss Adoption of the Draft Safety Culture Assessment Guidelines (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57610&shareable=true>, accessed December 11, 2024).

² Joint Utilities Draft Safety Culture Assessment Guidelines Public Comment (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57674&shareable=true>, accessed December 12, 2024).

³ California Association of Small and Multi-Jurisdictional Utilities Draft Safety Culture Assessment Guidelines Reply Comment (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57724&shareable=true>, accessed December 12, 2024).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
PROPOSED FINAL SAFETY CULTURE
ASSESSMENT GUIDELINES FOR
ELECTRICAL CORPORATIONS

December 2024

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Introduction

The Office of Energy Infrastructure Safety (Energy Safety) conducts an annual safety culture assessment to examine the safety culture of each electrical corporation. Energy Safety reviews the relative strengths and areas where there are opportunities for growth in the electrical corporation's safety culture and provides specific, actionable recommendations based on those findings. Energy Safety's Safety Culture Assessment Guidelines for Electrical Corporations (SCA Guidelines) outline the specific requirements for electrical corporations participating in the Safety Culture Assessment (SCA) process adopted by the California Public Utilities Commission as required by California Public Utilities Code section 8389(d)(4).

These SCA Guidelines are divided into the following sections: (1) Application of Safety Culture Assessments to Different Electrical Corporations; (2) Workforce Survey; (3) Management Self-Assessment; (4) Objectives, Lessons Learned, and Progress on the Previous Year's Recommendations; and (5) Interviews, Observational Visits, and Supporting Documentation.

The results of the Safety Culture Assessment will be consolidated into electrical corporation-specific reports that will present Energy Safety's findings (including recommendations) that an electrical corporation may agree to implement to demonstrate "good standing" per Public Utilities Code section 8389(e)(2).

1. Application of Safety Culture Assessment Components to Different Electrical Corporations

The SCA process includes six components and is applied to three categories of electrical corporations. Those categories and their respective utilities are:

- **Large electrical corporations:**¹
Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric (SDG&E), and Southern California Edison Company (SCE).
- **Small and multijurisdictional utilities (SMJUs):**
Liberty Utilities, PacifiCorp, and Bear Valley Electric Service, Inc. (BVES).
- **Independent transmission owners (ITOs):**
Horizon West Transmission, Trans Bay Cable, and LS Power.

Not every SCA component applies to every electrical corporation. The table below, is an overview of which components apply to each category of electrical corporation.

Component	The category of electrical corporation to which this component applies	Commentary
Workforce survey	Large electrical corporations, SMJUs	Energy Safety uses the workforce survey to assess key workforce perceptions and behaviors at the large and small electrical corporations, but not the ITOs, where the workforces

¹ Pub. Util. Code, § 8385(a)(4).

Component	The category of electrical corporation to which this component applies	Commentary
		are too small to ensure the anonymity of respondents.
Management self-assessment with summary plan for the coming year	Large electrical corporations	Energy Safety uses the management self-assessment, a detailed assessment of organizational systems, to evaluate the larger, more complex electrical corporations.
Safety culture objectives, summary of lessons learned, and progress on the previous year's recommendations	Large electrical corporations, 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 electrical corporations and SMJUs.
Interviews	Large electrical corporations	Interviews are required of large electrical corporations. Interviews may be required of any SMJU or ITO as determined by Energy Safety upon review of submissions.
Observational visits	To be determined by Energy Safety upon review of submissions	Observational visits may be required of any electrical corporation.

Component	The category of electrical corporation to which this component applies	Commentary
Supporting documentation	To be determined by Energy Safety upon review of submissions	Supporting documentation may be required of any electrical corporation.

2. Workforce Survey

The large electrical corporations and the SMJUs are required to participate in the safety culture workforce survey.

2.1 Target Population

The target population for the workforce survey consists of those employees, supervisors, managers, and contractors who are engaged in wildfire mitigation activities. This includes any electrical corporation employee or contractor employee who conducts work related to the electrical corporation's most recent wildfire mitigation plan as defined by any initiative listed within that plan. One example of this type of employee is a lineperson who is working to install system hardening infrastructure.

Energy Safety acknowledges that the expected small number of respondents from SMJUs may affect the survey results and will take the survey population into account in its evaluation.

2.2 Survey Planning

Energy Safety, each electrical corporation to be surveyed, and a third-party survey administrator will discuss the work units and contractor firms to be included in the target population before the administration of the survey. This discussion may occur in a planning meeting or by correspondence. Additionally, before the administration of the survey, Energy Safety, the electrical corporation, and the administrator will define deadlines, identify additional languages needed for the survey, finalize demographic questions,² identify strategies to encourage target population participation, and ensure there is understanding on next steps and responsibilities. Results will be segmented by demographic categories, provided such categorization does not compromise respondent anonymity. The results may be segmented by:

- Whether the respondent is an electrical corporation employee or contractor employee.
- Organizational level (executive, management, supervisor, or frontline worker).
- Type of wildfire mitigation activity (asset inspection, community engagement, grid operations, vegetation management, etc.).

² Demographic questions: as used in this document, questions that are part of the workforce survey that are used to analyze the survey results according to common groups within the organization while maintaining anonymity. For example, a common demographic question is to ask respondents to indicate which level their position is in the organization with options including executive, management, supervisor, and frontline worker.

- Location (where applicable: this varies by electrical corporation— for example, Liberty Utilities’ locations are North Lake and South Lake).
- Business unit.
- Length of tenure.
- Organizational level with length of tenure (this shows, for example, if executives who have been in their jobs longer gave more positive responses than new executives).

Below are examples of demographic questions; the terminology used in the question and the response options may vary by electrical corporation so that respondents are best able to recognize where they fit among the options.

- In which organizational function do you primarily work?
 - Response Options: Field Services, Transmission, Distribution, Environment, Health & Safety, Subcontractor, etc.
- What is your primary work location?
 - Response Options: List of company locations.
- What is your position within the company?
 - Response Options: Executive, Manager, Supervisor, Frontline Worker.
- Mark the wildfire mitigation activities in which you spend at least 10 percent of your time (check all that apply):
 - Response Options: Risk Assessment & Mapping, Situational Awareness and Forecasting, Grid Design and System Hardening, Vegetation Management, etc.

Representatives from the electrical corporation (including employee representatives and human resources staff), Energy Safety, and the third-party survey administrator will participate in survey implementation planning.

2.3 Workforce Survey Communication, Administration, and Collection

2.3.1 Overview

The workforce survey must be administered in an unbiased manner so that the survey output reflect a true representation of worker perceptions of their work environment, not unduly influenced by the employer or any other party. To that end, survey administrators and the electrical corporations must adhere to the following communication guidelines in all survey communication, administration, and data collection to maximize the survey output’s accuracy.

2.3.2 Workforce Survey Communication

To achieve an effective response rate, the electrical corporation must communicate the purpose for the workforce survey and the positive value of participation to the target population. In communicating with the target population about the survey, the administrator and the electrical corporations must:

- Encourage the survey population to participate in the survey and be honest in their responses.
- Indicate that the survey fulfills a state requirement for a safety culture assessment.
- Indicate that survey responses will inform a plan for improvement.
- Ensure that management communication supports survey participation and encourage labor leadership to do the same.
- Refrain from implying that responses to the survey could have repercussions for the electrical corporation's ability to obtain a Safety Certification or other adverse regulatory consequences.
- Indicate that the electrical corporation is interested in worker perceptions and is invested in improvement.
- Make it clear that responses are anonymous, and worker survey responses will have no bearing on performance reviews or compensation packages (e.g., salary, benefits, incentives).

2.3.3 Workforce Survey Administration

In the administration of the workforce survey, the third-party administrator and the electrical corporations must:

- Ensure the privacy and anonymity of responses submitted both online and in paper form.
- Take measures to ensure participants have a private place to complete the survey for those workers who may lack a private workspace. For example:
 - If respondents are completing the survey at a shared workstation (i.e., a workstation used by multiple people), provide instructions for accessing the survey link, responding, and then submitting the survey such that there is no need for a supervisor to be involved with submitting the survey or resetting the computer.
 - Ensure that no supervisors or co-workers are near the survey respondent.
 - If a paper version of the survey is used, ensure that no supervisors are in the room while respondents are completing the survey and that completed surveys are placed in a sealed envelope before they are handled further.

- Provide all workers in the target population with the opportunity to complete the survey.
- Accommodate accessibility and health-related needs (e.g., provide assistive technology, translation, and other reasonable accommodations).

2.3.4 Workforce Survey Data Collection

In the collection of data from the workforce survey, the third-party administrator and the electrical corporations must:

- Ensure the survey and responses are stored securely on the third-party administrator's server.
- Prohibit respondents from viewing or changing survey responses after submission.
- Prevent paper surveys from being reviewed or handled by any supervisors or managers in the electrical corporation.
- Ensure all paper survey responses are placed in pre-addressed and stamped envelopes and sent directly to the third-party administrator for processing.

2.4 Workforce Survey Questions

The workforce survey is designed to measure critical aspects of safety culture including both the general safety culture of the organization and the safety culture in the wildfire mitigation work setting.

The survey consists of 30 statements that respondents evaluate on a five-point scale ranging from “strongly disagree” to “strongly agree.”³ Respondents must be encouraged to respond to each statement⁴ based on their personal observations of the organization, supervisors, and fellow workers. Respondents must be instructed to refrain from evaluating statements if they are unable to respond based on personal observations. If respondents are unable to evaluate a statement based on personal observations, the respondents must be instructed to skip the statement.

The following terms are used within the survey statements:

³ The 30 workforce survey statements are based on a safety culture measurement instrument, the Organizational Culture Diagnostic Instrument, created by DEKRA Services, Inc. (<https://www.dekra.us/en/organizational-safety-reliability/ocdi/>, accessed Jan. 23, 2024). DEKRA modified some of the statements from the instrument in 2020 to incorporate wildfire safety concerns.

⁴ For the online version of the survey, responses to all statements are mandatory; for any paper versions of the survey used, respondents can only be encouraged to respond to each statement.

- “Leaders” and “management” are people in managerial responsibilities in the organization above the respondent’s level.
- “My supervisor” refers to the respondent’s immediate manager.
- “People” are others around the worker such as other work colleagues, contractors, or workers in peer groups.
- “People in my work group” and “my work group” refer specifically to the respondent’s work team.

There are three general topics covered by the 30 survey statements: wildfire safety, personal safety, and overall culture.

- **Wildfire safety** is addressed by 9 statements (e.g., “Our management acts quickly to address wildfire hazards”).
- **Personal safety** is addressed by 11 statements (e.g., “Pausing work for hazards and safety concerns is viewed positively”).
- **Overall culture** is addressed by 10 statements (e.g., “The company cares about my opinions”).

All 30 survey statements are listed below, broken down by general topic category.

2.4.1 Wildfire Safety

The 9 statements addressing wildfire safety:

- My work group consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards).
- I feel comfortable discussing wildfire hazards with my supervisor.
- Wildfire and personal safety concerns are communicated openly.
- Protecting the community from wildfire hazards is clearly a high priority with management.
- People look for wildfire hazards and risks as work progresses.
- People in my work group report all wildfire hazards, no matter how minor.
- Our management acts quickly to address wildfire hazards.
- Leaders actively seek out signs of potential wildfire hazards.
- I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them.

2.4.2 Personal Safety

The 11 statements addressing personal safety:

- I take responsibility for the safety of myself and others in my work area.

- If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor.
- Pausing work for hazards and safety concerns is viewed positively.
- I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment.
- Accidents and incidents are investigated completely to find out what happened and the corrective actions needed.
- People have the skills they need to resolve workplace safety issues.
- Leaders use mistakes and incidents as learning opportunities.
- Leaders keep people prepared to intervene when an emergency occurs.
- People have the ability to respond to and correct problems and errors before they get out of control.
- We have the right tools for the job.
- People focus on one task at a time and avoid distractions.

2.4.3 Overall Culture

The 10 statements addressing overall culture:

- People in my work group treat each other with respect.
- My supervisor would use whatever power they have to help me out.
- Leaders encourage people to ask questions.
- Information about important events and lessons learned is shared within my work group.
- My supervisor makes sure all employee concerns are heard before job decisions are made.
- Managers treat workers with respect.
- People listen to one another: it is rare that someone's views go unheard.
- I believe managers apply the same rules for all workers.
- People report mistakes they make, even if others do not notice them.
- The company cares about my opinions.

3. Management Self-Assessment

The large electrical corporations must submit a management self-assessment with target status projections for the end of the 12-month period following submission of the management assessment and associated summary plan for the coming year. This component provides each electrical corporation the opportunity to report the current state of 22 safety culture elements of its organizational culture (listed below) and project its state at end of the coming year (reflecting two years of expected progress).

3.1 How Electrical Corporations Must Complete the Management Self-Assessment

Energy Safety uses the management self-assessment to track organizational culture over time.

Each large electrical corporation must provide the status of various elements of its safety culture at present, its summary plan for the coming 12-month period, and the expected status at the end of the next year. In its summary plan, each large electrical corporation must outline the steps it plans to take to move the corporation from its current status to its target status at the end of 12 months from the date the plan is submitted to Energy Safety.

Each electrical corporation completing the management self-assessment must:

1. Provide the most appropriate response option for each of the 22 questions based on the presently employed practices and capabilities of the electrical corporation, including a description of why the corporation has rated the company at that level.
2. Summarize its plan to realize each target through its work in the coming 12-month period (see Section 3.6 “Summary Plan for the Coming Year” for more details).
3. Provide the electrical corporation’s expected assessment response to each question for the next year based on completing work planned for the coming year.

The management self-assessment rating scale and structure are presented below in section 3.2 through 3.6.

3.2 Behaviorally Anchored Rating Scale

The management self-assessment questions are rated using a four-level behaviorally anchored rating scale that is customized for each question. The four levels indicate how safety is viewed within the organization as defined by the table below:⁵

1	2	3	4
Public Compliance	Private Compliance	Stewardship	Citizenship
<p>Safety is viewed as an external requirement. Safety-supporting behaviors are not intrinsically motivated. Also, the company 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.^{9F}</p>	<p>Safety citizenship is individually directed.</p> <p>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>Safety citizenship is organizationally directed.</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,¹⁰ caring, ¹¹and trusting.¹² Safety leadership is broad and learning-oriented, with governance that is highly effective^{13F} and systematic.</p>

⁵ 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 Jan. 23, 2024) and Hofmann, Morgeson, and Gerras (2003), (<https://psycnet.apa.org/record/2003-04931-017>, accessed Jan. 23, 2024) and the work of Sentis Pty Ltd (<https://sentis.com.au/articles/safety-citizenship>, accessed Jan. 23, 2024).

3.3 Management Self-Assessment Structure

The management self-assessment is intended to assess nine dimensions across three categories: organizational sustaining systems, governance, and safety-enabling systems. The self-assessment structure is provided below.

1. Organizational Sustaining Systems	
1.1	<p>Performance Management: How the organization drives individual safety performance (3 questions)</p>
1.2	<p>Workforce Development: How employees and contractors are provided with training and continuous learning opportunities (3 questions)</p>
1.3	<p>Rewards and Recognition: Extent to which rewards and incentive systems support safety (1 question)</p>
2. Governance	
2.1	<p>Senior Leadership Safety Accountability: How safety leadership accountability is assigned and reflected through measures and objectives (3 questions)</p>
2.2	<p>Metrics and Targets: Effectiveness of safety metrics, actions of leadership in response to safety metrics, and the extent to which safety metrics are communicated (3 questions)</p>

3. Organizational Sustaining Systems	
3.1	Event Investigation: Types of incidents investigated, quality and results of investigations (3 questions)
3.2	Hazard Recognition: Extent to which hazards are reported and recognized (1 question)
3.3	Anticipation, Resilience, and Learning: How the organization anticipates and learns from incidents and near misses (3 questions)
3.4	Assurance: Safety audit processes used and tracking of findings (2 questions)

3.4 Index of Self-Assessment Questions

Each self-assessment dimension is assessed through one to three multiple choice questions. A list of all questions is provided here. The response options for each question are provided in the next section (Section 3.5).

1. Organizational Sustaining Systems

1.1 Performance Management

Dimension Subsection	Assessment Question
1.1.1	To what extent is wildfire safety performance integrated into leadership selection/promotion decisions?
1.1.2	How are wildfire safety responsibilities integrated into frontline supervisors' goals and objectives?

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

Dimension Subsection	Assessment Question
1.2.1	To what extent are training and support resources available to frontline supervisors to improve their safety leadership skills?
1.2.2	To what extent are training and support resources available to frontline workers to improve their wildfire safety skills?
1.2.3	What are the personal safety and wildfire-specific training requirements of contractors?

1.3 Rewards and Recognition

Dimension Subsection	Assessment Question
1.3.1	To what extent do rewards and incentives for operational leaders and workers support safety and mitigating wildfire hazards?

2. Governance

2.1 Senior Leadership Accountability

Dimension Subsection	Assessment Question
2.1.1	Who is accountable for wildfire safety outcomes?
2.1.2	Who is accountable for personal safety outcomes?
2.1.3	Rate the types of wildfire safety indicators and objectives tracked by senior operational leadership.

2.2 Metrics and Targets

Dimension Subsection	Assessment Question
2.2.1	How effective are wildfire safety metrics ⁶ in providing insight into critical areas of risk?
2.2.2	How frequently does the senior safety team monitor and adjust actions and strategies related to wildfire safety?
2.2.3	To what extent are wildfire safety metrics communicated throughout the organization?

3. Safety-Enabling Systems

3.1 Event Investigation

Dimension Subsection	Assessment Question
3.1.1	What types of adverse events are investigated using root cause analysis?
3.1.2	Rate the quality of event investigations.
3.1.3	What happens with investigation results?

3.2 Hazard Recognition

Dimension Subsection	Assessment Question
3.2.1	What kind of process is used by frontline workers to recognize and report wildfire hazards?

⁶ Wildfire safety metrics may include metrics such as inspection findings, ignitions, wire down events, wildfire fatalities, etc.

3.3 Anticipation, Resilience, and Learning

Dimension Subsection	Assessment Question
3.3.1	What structures, systems, and/or processes have been established to encourage sensitivity to weak signals of wildfire hazards?
3.3.2	What steps are taken to ensure frontline supervisors and workforce can respond quickly to upset conditions?
3.3.3	What processes and structures have been established to create a learning organization?

3.4 Assurance

Dimension Subsection	Assessment Question
3.4.1	What types of safety audits are used for activities related to wildfire mitigation?
3.4.2	How are the findings from safety audits of activities related to wildfire mitigation tracked to closure?

3.5 Management Self-Assessment Response Options for Each Question

This section contains the questions and response options for each management self-assessment dimension. To enable Energy Safety to verify responses, the electrical corporation must describe its reasoning for each self-assessment rating. Energy Safety may request supporting documentation. Section 5.2 gives examples of the types of supporting documentation Energy Safety may request.

1.1 Performance Management

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
1.1.1	Not considered	Personal and wildfire safety performance are	Personal and wildfire safety performance are	Excellent personal and wildfire safety performance are

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
To what extent is wildfire safety performance integrated into leadership selection/promotion decisions?		considered in selection/promotion decisions but are not the primary factors	heavily weighted and are primary factors in selection/promotion decisions	necessary for advancement; poor safety performance eliminates leader from selection/promotion
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 on only 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 leader's visible engagement in and support of wildfire and personal safety programs and initiatives
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

1.2 Workforce Development

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
<p>1.2.1</p> <p>To what extent are training and support resources available to frontline supervisors to improve their safety leadership skills?</p>	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
<p>1.2.2</p> <p>To what extent are training and support resources available to frontline workers to improve their wildfire safety skills?</p>	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

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
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

1.3 Rewards and Recognition

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
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 and wildfire safety	Rewards and incentives only focus on lagging indicators such as achieving no injuries or wildfires	Rewards and incentives emphasize lagging indicators for personal and wildfire safety and some leading indicators related to wildfire 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

2.1 Senior Leadership Accountability

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
2.1.1	Not defined	Safety Department	Operational leadership and Safety Department	Executive leadership with Safety Department as trusted advisor

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
Who is accountable for wildfire safety outcomes?				
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
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

2.2 Metrics and Targets

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
2.2.1 How effective are wildfire safety metrics⁷ in providing insight	Not effective	Reasonably effective in providing data and trends	Highly effective in providing data and trends in	Highly effective in providing data and critical exposure area trends, and actionable insight

⁷ Wildfire safety metrics may include metrics such as inspection findings, ignitions, wire down events, wildfire fatalities, etc.

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
into critical areas of risk?		across company	critical exposure areas	
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
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 indicators 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

3.1 Event Investigation

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
3.1.1 What types of adverse events are investigated using	Only fatal or serious incidents required to be	All incidents required to be reported; in addition,	All incidents with the potential to be serious or	All high potential events and near misses; also, event learning teams

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
root cause analysis?	reported to OSHA, CPUC reportable ignitions, or incidents required to be reported to Energy Safety (pursuant to Cal. Code Regs. title 14, section 29301)	work-related injuries involving days away from work and fire incidents that do not meet CPUC reporting standards	fatal, including near misses	evaluate high risk situations for proactive opportunities to reduce exposure
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
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 organization	Systemic approach to tracking/closing actions using high value controls; lessons learned leveraged broadly across organization to effect change and control exposure (e.g., leading to procedural or policy changes throughout organization, where applicable)

3.2 Hazard Recognition

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
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 organization to spur learning and exposure reduction

3.3 Anticipation, Resilience, and Learning

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
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; leaders encourage reporting of weak signals	A cross-functional team is established to proactively look for, track, and mitigate wildfire hazards and potential black swan situations
3.3.2 What steps are taken to ensure frontline supervisors and	No formal training or preparation	Common upset conditions have been identified and response	Simulations and drills are conducted regularly to	Simulations and drills are conducted regularly to practice responses to upset conditions and

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
workforce can respond quickly to upset conditions?		protocols are reviewed regularly	prepare the workforce	leaders have instilled a “what could go wrong?” mentality
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	Have 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

3.4 Assurance

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
3.4.1 What types of safety audits are used for activities related to wildfire hazard 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
3.4.2 How are the findings from safety audits of activities related	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

Assessment Question	(1) Public Compliance	(2) Private Compliance	(3) Stewardship	(4) Citizenship
to wildfire mitigation tracked to closure?				

3.6 Summary Plan for the Coming Year

Each large electrical corporation must submit a summary action plan for the work planned for the coming year to achieve its projected status targets. The template for the summary plan follows:

Summary plan for the following year:

In the table below, provide a summary action plan for the work that is planned over the coming 12-month period to achieve the targets as 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]	[Question number, e.g., 1.1.1]

4. Objectives, Lessons Learned, and Progress on the Previous Year's Recommendations

Each electrical corporation (inclusive of large electrical corporations, SMJUs, and ITOs) must submit 12-month and 3-year safety culture objectives and any lessons learned since the electrical corporation's last SCA. Additionally, each electrical corporation must report on the implementation of findings, including recommendations, from the previous year's SCA reports, including any results observed to date.

Energy Safety will use each electrical corporation's safety culture objectives, summary of lessons learned, and report on the implementation of findings, including recommendations, from the previous year's SCA report in its evaluation of each electrical corporation.

Instructions for completing these required components are included within each subsection below. The electrical corporation may provide a narrative response. This narrative response may include quantitative and qualitative explanations, as well as supporting documentation, including relevant spreadsheets, charts, or data tables.

4.1 Safety Culture Objectives

Each electrical corporation must provide a description of its objectives with respect to safety culture over the next 12 months, and over the next 3 years

The template for reporting this set of safety culture objectives follows.

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]

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]

4.2 Summary of Lessons Learned

The template for reporting the summary of lessons learned follows.

Description of lessons learned since the 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 to lesson learned]

4.3 Progress on the Previous Year's Recommendations

The template for reporting on the implementation of findings, including recommendations, from the previous year's SCA report follows.

Description of implementation of recommendations from 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 any results observed to date.

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]

5. Interviews, Observational Visits, and Supporting Documentation

Energy Safety will conduct interviews of the large electrical corporations, and may perform observational visits, and/or require supporting documentation from any electrical corporation. Interviews may be required of any SMJU or ITO as determined by Energy Safety upon review of submissions.

Information about these components of the SCA is included within each section below.

5.1 Interviews and Observational Visits

Each large electrical corporation must participate in 1) workforce survey follow-up interviews in the form of focus groups; and 2) management self-assessment follow-up interviews with respondents that completed the management self-assessment.

The objective of the interviews is to provide Energy Safety a better understanding of the results of the workforce survey and management self-assessment (where applicable). Understanding the organizational context behind responses helps Energy Safety interpret the results of the workforce survey and management self-assessment more accurately and better identify priority areas for improvement.

Energy Safety may perform observational visits as determined by Energy Safety upon review of submissions.

5.2 Documentation to Support Responses to the Management Self-Assessment, Objectives, Lessons Learned, and Progress on the Previous Year's Recommendations

Energy Safety may, at its sole discretion, require an electrical corporation to provide supporting documentation to support its justifications for self-ratings in the management self-assessment, safety culture objectives, lessons learned, and report on the implementation of findings and recommendations, from the previous year's SCA report.

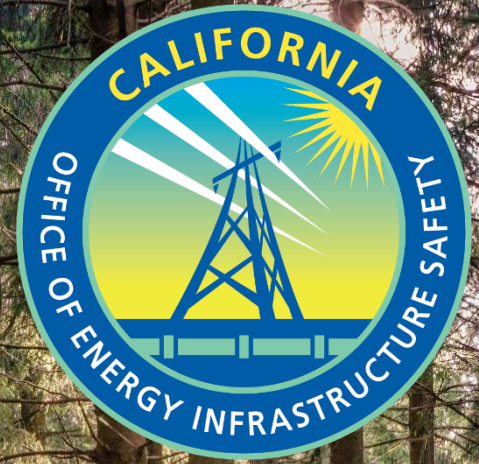
The table below provides examples of the types of documentation Energy Safety might request and the management self-assessment questions that might relate to each example of supporting documentation.

All electrical corporation submissions containing confidential information may be submitted using the confidential submission process in Energy Safety’s e-filing system.⁸

Supporting documentation that Energy Safety might request (not an exhaustive list)	Applicable Management Self-Assessment Questions
Evaluation and/or summary decision forms (containing the date, department, current job title, new job title, and decision criteria) used to make 3-4 leadership selection or promotion decisions (deleting any personal identifying information). The 3-4 examples must be operational leaders and a mix of levels from frontline supervisors to senior operational leaders.	1.1.1
A sample of performance goals and objectives used in personal annual performance reviews from 2-3 frontline supervisors.	1.1.2
Position descriptions for one frontline worker, supervisor, and senior operational leader.	1.1.3
A list of safety training required by frontline supervisors (do not include training required for specialty certifications or licenses such as cardiopulmonary resuscitation [CPR] certification).	1.2.1
A list of safety training required by frontline workers (do not include training required for specialty certifications or licenses such as a lineperson’s International Brotherhood of Electrical Worker certification).	1.2.2
A list of safety and wildfire hazard training required by contractors to perform work onsite (do not include training required for specialty certifications or licenses). This is training provided by the electrical corporation.	1.2.3
A summary of safety-related incentives (for example, financial, career development, recognition, etc.) used by the organization for operational leaders and workers. Include how the incentives are tracked, measured, and distributed and who is eligible for these incentives.	1.3.1

⁸ For more information, see the Energy Safety E-Filing System User Guide (<https://efiling.energysafety.ca.gov/Help.aspx>, accessed Jan. 24, 2024).

Supporting documentation that Energy Safety might request (not an exhaustive list)	Applicable Management Self-Assessment Questions
Examples of the wildfire metrics and reports reviewed by senior operational leadership beyond those required by the Wildfire Mitigation Plan process.	2.1.3, 2.2.1
Minutes, notes, and action items from the last 3-4 highest level operational safety meetings for wildfire management (the senior team charged with monitoring wildfire mitigation actions).	2.2.2
Examples of how the wildfire metrics are shared with frontline supervisors and workers. Describe how these are communicated.	2.2.3
Root cause analysis reports from the 3-5 most recent incident investigations that were not required to be reported to the CPUC or other regulatory body. Include corrective actions taken and the status of those actions.	3.1.1, 3.1.2, 3.1.3
A description of the process used for wildfire hazard recognition and the system used for tracking and communication. Describe actions taken as a result of hazards that surfaced over the past 6 months.	3.2.1
A spreadsheet of the last 50 wildfire hazard incidents (or potential incidents) recorded in the incident database including all demographic information (location, date, departments involved), type of incident (near miss, recordable, equipment damage, etc.) and actions taken.	3.3.1
A description of the systems, processes, and/or structures that are used to capture, share, and implement best practices and lessons learned from incidents.	3.3.3
A description of the audit processes used for activities related to wildfire mitigation, detailing how they are conducted, their frequency, and how audit findings are tracked to closure.	3.4.1
The most recent audit conducted of a site or department on activities related to wildfire mitigation. Include the site or department's action plan based on the audit.	3.4.2



GLOSSARY

Glossary

Term	Definition
Black swan	An unpredictable event that goes beyond what is normally expected and has potentially severe consequences.
CPUC reportable ignition	A fire-related event meeting the following conditions: (1) A self-propagating fire of material other than electrical and/or communication facility, (2) The resulting fire traveled greater than one linear meter from the ignition point, (3) The electrical corporation has knowledge that the fire occurred. Electrical corporations must submit to the California Public Utilities Commission (CPUC) information about this event that is useful in identifying operational and/or environmental trends relevant to the event. (See CPUC Decision 06-04-055 and Resolution E-4184.)
Drills	Coordinated, supervised activities designed to test work team responses to various planned upset conditions.
Event learning	An approach to understanding incidents and events that evaluates the entire system leading to an event to better understand the causes of actions. The focus of event learning is primarily on how to alter the system to make it less likely for the factors that caused the event to recur rather than to assign blame or define a single root cause factor.
Executive leadership	The highest level of management in an organization, reports to the chief executive officer (CEO).
Exposure	The presence of people, infrastructure, livelihoods, environmental services and resources, and other high-value assets in places that could be adversely affected by a hazard
Exposure management training	A training that emphasizes a proactive approach to safety through identifying and controlling exposure for self and others and is foundational for leaders to move beyond the traditional and reactive incident management approach to safety.

Term	Definition
Frontline supervisor	The first level of leadership that has direct oversight of employees within operational units of the organization.
Frontline worker	An employee who does not have any other employees reporting directly to them.
High risk situations	Work activities or situations that have previously been shown in incident data to be associated with serious or fatal incidents.
High value controls	The hierarchy of controls consists of five layers of defenses used to protect against hazards in the workplace ranging from the most effective (Elimination) to the least effective (personal protective equipment or PPE). The layers are Elimination, Substitution, Engineering, Administrative, and PPE. High value controls are Elimination, Substitution, and Engineering because the effectiveness of the control is not susceptible to human error.
Human performance reliability	The suite of knowledge, skills and capabilities required to anticipate, control, and respond to unplanned issues and error.
Incident	An unplanned, undesired event that adversely affects normal operations, not limited to CPUC reportable ignitions.
Individual contributor	An employee that does not have any other employees directly reporting to them.
ITO	Independent transmission owner
Lagging indicator	An outcome or output measure that is backward-looking, describing a past event.
Leading indicator	An input measure that is predictive of a future event.
Learning organization	An organization skilled at creating, acquiring, and transferring knowledge, and at modifying its behavior to reflect new knowledge and insights.

Term	Definition
Near miss	An unplanned event that did not result in injury, illness, or damage, but had the potential to do so. Note that in other contexts, Energy Safety uses the term “risk event” instead of “near miss” but uses “near miss” in this document as it is a more commonly understood term in the safety culture context.
Operations	The parts of a business that affect the production, distribution, and service necessary for a company to function. For the purposes of this assessment, electrical operations, field services, transmissions, substations, and distribution are considered part of operations, but generation is not.
Operational leaders	Supervisors working in the levels of management within operations ranging from frontline supervisors (who have direct oversight of employees) to executive level senior operational leaders (e.g., chief operating officer [COO]).
OSHA reportable incidents	Fatal and extremely serious injuries or illnesses, such as amputation, eye loss, in-patient hospitalization, or fatality, required to be reported to OSHA within defined time periods. OSHA stands for the Occupational Safety and Health Administration of the United States Department of Labor.
Psychological safety	Psychological safety refers to a quality in a work environment where employees feel safe to voice ideas, willingly seek feedback, provide honest feedback, collaborate, take risks, and experiment.
Root cause analysis	A systematic process for identifying root causes of problems or events and an approach for responding to them.
Safety audit	A structured process whereby information is collected relating to the efficiency, effectiveness, and reliability of a company’s total health and safety management system.
SMJUs	Small and multi-jurisdictional utilities
Systemic risk	Vulnerabilities that could result in cascading or broad failures across the electrical corporation.

Term	Definition
Upset conditions	Interruptions in the regular running of work processes or other planned activity.
Weak signal	An indicator of a potentially emerging issue that may become significant in the future.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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