

**ATTACHMENT B**

**RESPONSIVENESS OF THE SAFETY CULTURE IMPROVEMENT PLAN TO THE  
“CULTURAL FACTS” IN THE 2EC REPORT**

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The Scoping Ruling directs SoCalGas to submit a filing which “[d]irectly responds to all of the Safety Culture Report findings, including those related to corporate governance” (SoCalGas refers to the “Safety Culture Report” hereafter as the “2EC Report”).<sup>1</sup> In responding to this request, SoCalGas took guidance from the following statement in the 2EC Report:

The assessment focused on safety culture. Safety culture is defined as the shared values, attitudes, beliefs, perceptions, and behavioural norms related to risk and safety. This is consistent with the organizational culture definition the CPUC described in I.19-06-014.

The assessment of safety culture, thus, requires understanding the values, principles, beliefs, perceptions, and often unspoken norms that are manifest in, and are in fact the invisible drivers of, the individual choices and behaviors and the collective decisions of the organization. Organizational members enact these basic elements most often without thought and reflection. This means that cultural facts collected in the assessment of safety culture consist of perceptions, beliefs and values.<sup>2</sup>

SoCalGas does not contest the below-identified cultural facts as representing certain perceptions, beliefs, and values.<sup>3</sup> SoCalGas appreciates and acknowledges 2EC’s statement that “[p]erceptions drive behavior”<sup>4</sup> and has drafted the Safety Culture Improvement Plan (Plan) with the intent of changing and enhancing company culture – “perceptions,

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<sup>1</sup> In this Attachment B, SoCalGas has included all the cultural facts identified in the 2EC Report, including those related to Sempra. For information related to Sempra’s support, oversight, and governance of the SoCalGas Plan, and for more detail related to “Sempra’s Safety Culture Oversight and Initiatives”, please see Attachment C.

<sup>2</sup> 2EC Report at 4

<sup>3</sup> Many of the cultural facts are not facts in a traditional sense, but do represent cultural facts or indicators of perceptions, beliefs, or values. For example, 2EC observed that “[i]nterviewees described little to no contractor oversight and perceive this is because it is less of a direct liability for the company.” This perception of liability is not accurate. Under applicable law, SoCalGas can be held liable for the actions of its contractors when the contractors are executing SoCalGas tasks. That noted, SoCalGas agrees that it is relevant that certain employees believe this to be true and, accordingly, this cultural fact represents an opportunity to engage in more dialogues on contractors or enhance transparency around contractor oversight.

<sup>4</sup> 2EC Report at 25.

beliefs, and values” related to safety and risk. SoCalGas is focused on understanding the cultural facts and identifying forward-looking opportunities to learn and improve. Accordingly, below, SoCalGas details how the Plan is intended to respond to these cultural facts in a positive and productive way.

The 2EC Report groups the cultural facts into separate traits of a healthy safety culture, which are then used to identify themes, which inform conclusions and recommendations. SoCalGas has identified Plan activities, specific workstreams, and associated initiatives that respond to these cultural facts, themes, conclusions, recommendations, and traits. In the below table, for each theme, SoCalGas has identified cultural facts, traits, 2EC recommendations and conclusions, and the way SoCalGas’s Plan is responsive to them.

**Overarching Theme 1 - Safety is most often perceived as personnel safety.**

<b>Cultural Fact</b>	<b>2EC-Identified Traits, Conclusions, and Related Recommendations</b>	<b>SoCalGas Plan</b>
Personnel safety is widely perceived to be a value in the organization; response to COVID-19 is frequently cited as a positive example.	<p style="text-align: center;"><u>Trait</u></p> <p><i>Leadership Safety Values and Actions:</i> Leaders demonstrate a commitment to safety in their decisions and behavior.</p> <p><i>Personal Accountability:</i> All individuals take personal responsibility for safety.</p> <p><i>Decision-Making:</i> Decisions that support or affect safety are systematic, rigorous, and thorough.</p>	Broadly, SoCalGas’s Plan is intended to address these cultural facts through intentional and visible leadership support and commitment, comprehensive and enterprise-wide Plan reach, expanding strengths in personnel safety to encompass a more holistic view of safety, structured change management and management of change as applicable, two-way dialogues and engagement-oriented communications, and inclusion of
Documentation identifies SoCalGas’s values and leadership’s commitment to safety		
The Enterprise Risk Policy and Plan details Sempra’s analysis of potential threats to the company.		
<p>The Sempra governance model of SoCalGas is perceived to ensure that safety is constantly scrutinized through a variety of monitoring techniques.</p> <ul style="list-style-type: none"> <li>• SoCalGas has its own Board of Directors (D1).</li> <li>• Sempra influence is to ensure that SoCalGas operates in the framework of Sempra values (D1).</li> <li>• Interviewees indicated that Sempra Board Meetings follow quality and effectiveness of day-to-day activities, but do not manage the operating companies. Executives described this as the right model for assessing enterprise risks (D2,3).</li> <li>• Executives described that governance was conducted through the briefing of safety programs and by bringing innovation in technical and safety areas to different operating companies (D1,2).</li> <li>• Updates provided for SoCalGas and SDG&amp;E through the Chairman; only two Sempra companies under CPUC regulation (D1,3).</li> </ul>		

<ul style="list-style-type: none"> <li>• The Sempra Audit Team reports to the Sempra Board of Directors (D1,3).</li> <li>• Some Sempra Executives and Board Members have visited some SoCalGas locations (D3,8).</li> <li>• The Safety, Sustainability and Technology (SST) Committee of the Sempra Board reviews SMS, wildfires, construction safety with LNG, safety with gas infrastructure, fatalities (D1,3).</li> <li>• Executives and Senior Managers indicated that they obtain outside perspectives of safety through selection of an independent safety committee for the Sempra Board and an independent safety council for the SoCalGas Board. (D2).</li> <li>• Sempra governance keeps safety as part of performance measure and compensation (D7).</li> <li>• Interviewees indicated that the SoCalGas Senior Management Team has a strong respect for the Sempra Audit Team in their quality assurance role. (D1,3).</li> <li>• Observations indicated that Sempra intends to further support relations to regulators and legislators focusing on consistency with goals in lobbying and with trade associations.</li> </ul>	<p style="text-align: center;"><u>Related Conclusions</u></p> <p><i>Leadership Safety Values and Actions:</i> Leaders clearly espouse the value of safety generally, though clearly mostly emphasizing personnel safety. Reward systems also have an emphasis on personnel safety and use lagging indicators to assess safety performance. They do not seem to integrate public and security risk into their messages, measurements, or rewards.</p> <p><i>Personal Accountability:</i> The report details incidents at SoCalGas of shifting blame and trying to keep from being blamed. Situations are documented where compliance and rule following existed even when best judgments might suggest other choices.</p>	<p>contractors within the scope of the Plan.</p> <p>SoCalGas recognizes the importance of effective change management when implementing any modification, particularly enterprise-wide, large-scale changes like those envisioned by the Plan. Change management facilitates adoption of a change by supporting employees through the transition. This includes leadership support and commitment, communication, and anticipating barriers.</p> <p>SoCalGas's Plan emphasizes leadership commitment, support, and engagement. This approach is evident in (1) the role of the Executive Safety Council in providing oversight and guidance; (2) the Plan structure, which has assigned executive leaders</p>
<p>The overall response rate to the Safety Culture Perception Survey was quite high, 85% among SoCalGas employees and 79% among Sempra employees.</p>		
<p>Among Sempra respondents to the survey, 40% were Directors, Officers, Managers and Supervisors.</p>		
<p>All average scores to the survey questions among Sempra respondents were higher than those of SoCalGas survey respondents.</p>		
<p>SoCalGas survey respondents among the Leadership, SMS, Human Resources, Integrity Management, Management &amp; Strategic Planning, Communication and Local Government and Community Affairs groups had the highest overall scores on the Safety Perception Survey questions.</p>		
<p>SoCalGas respondents to the Safety Culture Perception Survey had positive perceptions of leadership's commitment to safety; Directors and above had the most positive perceptions of safety culture.</p>		
<p>Public Safety and Security were seldom discussed in the conversation around safety.</p>		

<ul style="list-style-type: none"> <li>• Observations of Safety Compliance calls at SoCalGas indicated that pipeline safety is presented as beyond “normal safety.” Normal safety is more concerned with driving, personnel and customer safety.</li> <li>• During System Status calls at SoCalGas, other than an initial Safety Tip, no mention of safety was made around the work processes being discussed.</li> <li>• Most documents reviewed around effective safety communication focused exclusively on personnel safety, e.g., driving policy, health protocols.</li> </ul> <p>Interviewees at SoCalGas indicated that employee safety training focuses on personnel safety without the inclusion of public safety.</p>	<p><i>Decision-Making and Work Processes:</i> Staffing issues were described by interviewees at a number of SoCalGas locations. Concerns were often raised around fatigue, overtime, emergency response systems, replacement of employees, loss of field experience workers and their expertise, the increased use of subcontractors, and the lack of field experience of supervisors and planners. Some workers reported that they are often not equipped to make the kind of policy and procedure interpretations necessary in complex and unexpected field conditions. This does not lead to a list to be fixed but suggests that the culture that has led to these concerns has not prioritized safety.</p> <p><u>Related Recommendations</u></p> <ol style="list-style-type: none"> <li>1. Develop a shared understanding of a</li> </ol>	<p>sponsoring and accountable for workstreams and initiatives; and (3) the communications plan, which calls for leaders to demonstrate strong and visible engagement and leadership, emphasizing their commitment to the change to employees at all levels.</p> <p>Additionally, SoCalGas plans to use sustained two-way communication, not only to bring forth critical intelligence from the front line and build collaboration, but also to diagnose and understand potential barriers. The Plan is designed to reach employees and contractors with consistent messages, engaging them in two-way communications, and incorporating feedback into the Plan as we move forward.</p> <p><u>Relevant Workstreams and Initiatives</u></p>
<p>The absence of Security was noted during multiple field observations at SoCalGas.</p> <ul style="list-style-type: none"> <li>• An installed fence was removed for construction and not replaced.</li> <li>• No security at several visible and accessible site entrances that had exposed pipes.</li> <li>• Aliso Canyon is now getting additional and updated security cameras.</li> </ul> <p>Interviewees indicated that while the Emergency Operations Center and Security Management meet, they do not talk about threats that could potentially impact both areas at the same time.</p>		
<p>Some management interviewees at SoCalGas indicated that they believe they are enhancing safety culture by training 5000 employees, showing videos with Executive Managers and members of the Leadership Team, having the SMS Plan, and conducting some interviews and focus groups. Safety Culture Perception Survey results, however, indicated that significant differences still exist between managers and directors and frontline employees at SoCalGas on their perceptions around safety. Managers and Directors had significantly more positive perceptions of safety overall than frontline employees.</p>		
<p>SoCalGas does not use an integrated and systematic process for evaluating and implementing change so that all aspects of safety are considered. The following bullets detail this issue.</p> <ul style="list-style-type: none"> <li>• Individuals representing changes in standards, processes and leadership work independently without assessing the overall strategic impact of the changes occurring in their area to the other areas. (D1,8)</li> <li>• Change management is related to business units more than safety with no systematic risk assessment of change (SPD-03, Appendix D).</li> </ul>		

<ul style="list-style-type: none"> <li>• While SoCalGas recently positioned the Chief Safety Officer as a direct report to the CEO of the company, the reason for the change has not been clearly communicated or understood even by those in leadership positions.</li> <li>• Interviewees indicated that if organizational changes did not directly impact your group, then leadership would get a quick call before the general announcement; if the group was directly impacted by the change, then a call with leadership and their direct reports would be made to go over the details of the change.</li> <li>• Interviewees perceive that most “management of change” is around changing standards.</li> <li>• Interviewees expressed the opinion that SoCalGas tries to comply with CPUC through changing policies without the appropriate change management strategy.</li> <li>• Interviewees describe change management occurring by email without any explanations.</li> </ul>	<p>robust concept of safety and risk through dialogues with Sempra, SoCalGas Board Directors, Executives and Senior Management that is facilitated by external and independent experts.</p>	<p>Workstream 1 is intended to build and operationalize a comprehensive understanding of safety across the organization through three Initiatives. Initiative 1A involves leadership dialogues to define and implement a more comprehensive concept of safety with guidance from an external expert. Initiative 1B involves creating a shared understanding of safety through an enterprise-wide communication plan, with focus on two-way engagement with stakeholders. And Initiative 1C involves reviewing and updating documents, processes, and communications to incorporate a comprehensive view of safety.</p>
<p>Leaders at SoCalGas are not consistently observing, coaching or reinforcing standards and expectations. Supervisors in the field did not take notes or actions on issues related to inconsistent use of personal protective equipment, foreign material in excavation sites, incorrect information from databases required for mapping, work activities.</p> <ul style="list-style-type: none"> <li>• Interviewees describe an unhealthy mindset for safety in the field, ‘if don’t feel like wearing PPE (personal protective equipment), don’t’; it’s not about safety but about rules that they don’t have to follow; there is a lack of integrity.</li> <li>• The lowest scores on the survey questions for Sempra respondents around leadership were about management being in the field. (D1,8)</li> <li>• Some SoCalGas interviewees indicated that managers do not have time to come out to the field and those that do often do not have the right PPE.</li> <li>• SoCalGas interviewees described leaders talking about safety, but that they don’t take action to replace old equipment or provide better equipment.</li> <li>• Some interviewees at SoCalGas perceive feeling some tension between working perfectly to standards and pushing through work orders. They describe a lot of time pressure to get tasks done, e.g. customer service,</li> </ul>	<ol style="list-style-type: none"> <li>2. Extend the membership of the SoCalGas Board to include an expert on safety culture and systemic approach to safety.</li> <li>3. Conduct dialogue sessions with all levels in the organization to create a shared understanding of the assessment results and what comprehensive safety means for each business and organizational unit. The objective of these sessions would be two-fold; 1) self-reflection of the culture based on the results, 2) capture</li> </ol>	<p>Workstream 2 is intended to enhance dynamic risk assessment capability through two Initiatives.</p>

<p>call center, sometimes without being able to complete the job as prescribed in the standards.</p>	<p>the organizations intelligence and creativity on how to recover the areas in need of attention. Action items should result from the dialogue sessions that will meet the objectives of the sessions.</p> <p>4. Establish methods for managers to enhance the understanding, skills and enactment on how their leadership can influence the safety culture positively e.g. empowerment, listening rather than telling, learner mind-set.</p> <p>5. Analyze the resource allocations and competence levels to assure safety and reliability.</p> <p>6. Provide training to the entire organization with practical examples unique for each</p>	<p>Initiative 2A aims to improve systems and processes through dynamic risk assessment practices. Initiative 2B seeks to introduce and integrate the concept of “dynamic risk assessment” into training and hazard assessments.</p> <p>Workstream 3 is intended to optimize SoCalGas’ safety operating model through three initiatives. Relevant to this theme, Initiative 3A will evaluate resource allocation to validate technology, staffing, and equipment are aligned with safety and risk management goals.</p> <p>Workstream 5 is intended to mature SoCalGas as a learning organization through four initiatives. Initiative 5A is designed to refine and implement leadership training to expand management influence on advancing and enhancing safety culture. Initiative 5B is designed to</p>
<p>Some interviewees questioned whether recommendations and feedback from both Sempra and SoCalGas’ corporate governance, review boards, and independent oversight organizations override Senior Management’s ultimate responsibility for decisions that affect safety.</p> <ul style="list-style-type: none"> <li>• Observations of SoCalGas Senior Management meetings indicated confusion with the governance model by Sempra. Some SoCalGas Board items must first go to the Sempra Board for review, but not for formal approval. Dialogue around these items is not formalized and then the items are returned to the SoCalGas Board. These items include, policy, dollar level authorizations, control structure, regulatory findings, work order summary sheet (monthly commitment) (D1,8,9).</li> <li>• Some interviewees believe that the SoCalGas Board is strongly influenced by Sempra because of the significant participation by Sempra officers. (D2,3)</li> </ul>		
<p>Survey respondents in SoCalGas’s Construction, Distribution, Planning &amp; Project Management, Gas System Integrity &amp; Programs, and Gas Transmission Ops groups had the lowest response rates (52 - 59%).</p>		
<p>Nearly a third of all SoCalGas survey respondents do not perceive that employees are recognized for safety conscious behaviors.</p>		
<p>Approximately 20% of SoCalGas survey respondents indicated that they are sometimes cynical about safety.</p>		
<p>Safety Culture Perception Survey respondents indicated an overall positive perception of personal accountability.</p>		
<p>Directors who responded to the Safety Culture Perception Survey were the most positive with respect to personal accountability.</p>		
<p>Interviewees indicated that they understand and are trained to take a serious responsibility about their personal safety and how it impacts family, community and other workers at SoCalGas.</p>		
<p>Individuals at SoCalGas identified that the Union sometimes provides checks and balances for decisions involving safety and will hold front line supervisors responsible for personnel safety.</p>		
<p>interviewees indicated that SoCalGas cannot impose financial consequence on contractors for making a mistake but perceive that the loss of future contracts is even more powerful in getting contractors to achieve high safety standards. An</p>		

<p>example cited was a contractor self-reported a fatality on another job site, SoCalGas requested them to perform a safety culture assessment and the contractor could not bid a SoCalGas job for 6 months until improvement in their safety performance could be demonstrated. The company is being monitored and slowly returning to acquiring SoCalGas business.</p>	<p>department on how the new shared understanding of safety and safety culture to the organization will change the way business is done and why it is important to make the change. This training can be incorporated into existing programs.</p> <p>7. Incorporate the broader concept of safety e.g. include examples of public safety, security, into safety items on meeting agendas, in tailgates, in job hazard assessments, newsletters, etc.</p>	<p>enhance existing enterprise training to focus on comprehensive safety and promote interdisciplinary transparency and collaboration. Initiative 5C is designed to develop and implement an Executive Safety Leadership Program to introduce and explore safety culture concepts and potential application to the SoCalGas organization. Initiative 5D is designed to Assess existing internal and external organizational learning practices that advance safety culture and performance, and explore concepts and practical approaches that may be deployed within SoCalGas. Each of these four initiatives is intended to support an environment of learning, in which employees feel that a questioning attitude is valued and that concerns will be acted on.</p> <p>Other Plan initiatives also address aspects of these</p>
<p>Interviewees expressed the perception that a double standard exists around accountability in SoCalGas. Some interviewees reported that if a manager makes a mistake, they are moved, sometimes up in the organization or they are fired and then they are asked back a couple years later. If a non-supervisor makes a mistake, sometimes because they were following the verbal instruction of their supervisor, they get blamed for not following policy and disciplined.</p>		
<p>Several interviewees at SoCalGas indicated that there is no accountability, 'I can do wrong and there is no consequence'.</p>		
<p>Several interviewees at SoCalGas when asked who owns safety, responded Leadership and the Chief Safety Officer.</p>		
<p>Interviewees at SoCalGas indicated that although all policy changes must be reviewed by each individual and acknowledged online to ensure accountability; in the past individuals used to have meetings with supervision to go over the changes and have an opportunity to ask questions.</p>		
<p>Interviewees at SoCalGas indicated that employees are disciplined for not following company policies, but this is inconsistently implemented. Supplemental personnel (contractors) do not always understand, and/or practice expected behaviors and actions.</p> <ul style="list-style-type: none"> <li>• SoCalGas respondents to the Safety Perception Culture Survey had some of the lowest scores on the question of contractors being held accountable.</li> <li>• Survey comments indicated the perception that contractors are not held to the same standards as SoCalGas employees.</li> <li>• Contractors had a very low response rate to the Safety Culture Perception Survey even though they had been requested to complete it.</li> <li>• Observations identified inconsistent use of PPE by contractors in the field.</li> <li>• Questions raised about contractors using a different system for reporting non-compliances.</li> <li>• Interviewees indicated that some 3rd party inspectors overlook actions that do not comply with SoCalGas standards.</li> </ul>		

<ul style="list-style-type: none"> <li>Interviewees described little to no contractor oversight and perceive this is because it is less of a direct liability for the company.</li> </ul>		
<p>Safety Culture Perception Survey respondents had positive perceptions about decision-making in both the SoCalGas and Sempra organizations.</p>		<p>cultural facts, traits, conclusions, and recommendations.</p>
<p>Decisions made to protect personnel during the COVID-19 pandemic have been praised by many of the interviewees.</p>		
<p>Observations and interviewees at SoCalGas indicated that a consistent, systematic approach to decision-making where risk insights are incorporated as appropriate is frequently not implemented. Following are examples.</p> <ul style="list-style-type: none"> <li>Judgments are frequently required in the tasks of personnel in the field and yet not acknowledged by supervision as such, e.g., on a locate and mark work order, two homeowners were not at home and an electric current could not be attached to enable indications. The technician decided that given the ‘normal’ way pipes were installed, the pipe was ‘probably’ outside the dig area and therefore he decided not to mark it.</li> <li>Interviewees described a situation in which the policy stated that only certain equipment can be used on a 36-inch pipe, but a ‘solution specific enhancement’ of increasing the pipe fitting was used because some pipeline is older than policy.</li> <li>Many interviewees that rely on policies indicated that most policies have ‘grey areas’ where judgments are required. Most described depending upon supervisors to help make the decisions but also expressed that with many ‘new and inexperienced supervisors’ they often rely on co-workers or themselves.</li> <li>Interviews indicated that supervisors and managers underestimate the number of interpretations, judgments, and field relevant knowledge that their field workers report and struggle with.</li> <li>Interviewees indicated that calls on categorizing leaks are judgment calls.</li> <li>Interviewees indicated that in analyzing risk they are finding a more cost-effective solution, emphasizing the talk around cost.</li> </ul>		

**Overarching Theme 2 – Safety and risk are perceived as achieved by compliance.**

Cultural Fact	2EC-Identified Traits, Conclusions, and Related Recommendations	SoCalGas Plan
Interviewees indicated that the SoCalGas Board uses its External Safety Advisory Council to ask probing questions to understand the implications and consequences on safety of proposed activities (D2).	<p align="center"><u>Trait</u></p> <p><i>Questioning Attitude:</i> Individuals avoid complacency and continuously challenge existing conditions</p> <p><i>Environment for Raising Concerns:</i> A safety conscious work environment (SCWE) is maintained where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination.</p> <p><i>Respectful Work Environment:</i> Trust and respect permeate the organization.</p>	<p>Broadly, SoCalGas’s Plan is intended to address these cultural facts through comprehensive and enterprise-wide Plan reach; focus on learning and continuous improvement to enable better understanding of culture, risk, a more holistic view of safety, and support a learning mindset; two-way dialogues and engagement-oriented communications; and inclusion of contractors within the scope of the Plan.</p> <p>SoCalGas plans to use sustained two-way communication, not only to bring forth critical intelligence from the front line and build collaboration, but also to diagnose and understand potential barriers. Consistent with this intent,</p>
Stop the Job is frequently identified by interviewees as a tool that allows them to stop work activities when confronted with an unexpected condition, communicate with supervisors, and resolve the condition prior to continuing work activities.		
Respondents to the Safety Culture Perception Survey had positive scores in response to the statement about being encouraged to adopt a cautious and questioning approach in their work.		
The consistent focus by interviewees in SoCalGas and Sempra on the very positive perceptions and actions around personnel safety while attributing the job of risk assessment to someone else’s job contribute to the lack of a questioning attitude.		
Interviewees across various locations in SoCalGas expressed concerns that some leadership has accepted the smell of gas as normal.		
During a tour of Aliso Canyon, it was pointed out that the water supplies along the road leading up to the well were not marked. The organization had not anticipated and questioned the importance of being able to access the water supply during an event.		
Interviewees at SoCalGas indicated that when standards change, each group, i.e., training group, evaluates change for its program. However, individuals were not aware how or who was questioning the impact of the changes for the entire organization, e.g., management of change process.		
Some interviewees indicated that SoCalGas has a long history of a compliance mindset versus a competence mindset.		
Both SoCalGas and Sempra Safety Culture Perception Survey respondents had lower positive responses to the statement about the extent to which questioning management decisions is encouraged compared to other questions on the survey. This is consistent with SoCalGas responses to the survey questions identified in the trait labeled Environment for Raising Concerns.		

<p>Interviewees reported that few individuals were ever fired for self-reporting their own mistakes.</p>	<p><u>Related Conclusions</u></p> <p><i>Environment for Raising Concerns and Questioning Attitude:</i> Basic principles for a questioning attitude, especially regarding personnel safety exists and is clearly reinforced. People are not punished for raising concern. But many SoCalGas employees especially working in the field indicated that they do not feel that they can raise concerns and/or that they will not be acted on.</p> <p><u>Related Recommendations</u></p> <ol style="list-style-type: none"> <li>1. Develop a shared understanding of a robust concept of safety and risk through dialogues with Sempra, SoCalGas Board Directors, Executives and Senior Management that is facilitated by external</li> </ol>	<p>the Plan is designed to reach most or all employees and contractors with consistent messages, engaging them in two-way communications, and incorporating feedback into the Plan as we move forward.</p> <p><u>Workstreams and Initiatives</u></p> <p>Workstream 1 is intended to build and operationalize a comprehensive understanding of safety across the organization through three Initiatives. Initiative 1A involves leadership dialogues to define and implement a more comprehensive concept of safety with guidance from an external expert. Initiative 1B involves creating a shared understanding of safety through an enterprise-wide communication plan, with focus on two-way engagement with stakeholders. And</p>
<p>Safety Culture Perception Survey respondents from both SoCalGas and Sempra were positive in their responses to understanding that they are responsible to raise concerns.</p>		
<p>Interviewees indicated that the board meetings have an open climate for discussion.</p>		
<p>Some SoCalGas interviewees indicated feeling inhibited to raise safety concerns because of fear of embarrassment or harassment by supervision.</p> <ul style="list-style-type: none"> <li>• Interviewees identified that some supervision does not want them to report fatigue; if reported the supervisor comes to the job site to drive the individual back to the base often perceived as embarrassing but then lets the worker drive home alone.</li> <li>• Some individuals do not perceive that they can ask questions which might reveal what they don't know, e.g., about policies; it would create a negative perception about them among their supervision.</li> <li>• Interviewees indicated that they perceive they cannot use Stop the Job in the Call Center.</li> <li>• Several interviewees at different locations indicated that they perceive pressure not to report injuries and would not feel 'safe' doing so.</li> <li>• Interviewees indicated that an open dialogue with the upper management is missing.</li> </ul>		
<p>The lowest overall score on the Safety Culture Perception Survey for SoCalGas respondents was in response to the statement that individuals have the ability to openly challenge decisions by management. Only 55% of all respondents agreed with the statement.</p>		
<p>For Sempra respondents on the Safety Culture Perception Survey, scores were less positive in response to the statement that criticism is encouraged and, in the ability, to challenge decisions.</p>		
<p>Observations indicated that SoCalGas Customer Service Technicians, Field Technicians and Inspectors were very courteous to customers and respectful of their property.</p>		
<p>Most SoCalGas respondents to the Safety Culture Perception Survey responded positively to the statement that there is respect and trust within the company.</p>		
<p>Interviewees indicated that the SoCalGas responses in the recent Employee Engagement Survey were very positive compared to industry peers.</p>		

<p>Most interviewees describe the company’s treatment of employees during the COVID-19 pandemic as very sensitive and positive; concerns about going into customers’ homes, frequent assessments of employees’ attitudes and opinions about working from home and schedules; benefits to reduce the impact of the burden from the ‘new normal’.</p>	<p>and independent experts.</p> <p>2. Extend the membership of the SoCalGas Board to include an expert on safety culture and systemic approach to safety.</p> <p>3. Conduct dialogue sessions with all levels in the organization to create a shared understanding of the assessment results and what comprehensive safety means for each business and organizational unit. The objective of these sessions would be two-fold; 1) self-reflection of the culture based on the results, 2) capture the organizations intelligence and creativity on how to recover the areas in need of attention. Action items should result from the dialogue sessions that will meet</p>	<p>Initiative 1C involves reviewing and updating documents, processes, and communications to incorporate comprehensive view of safety.</p> <p>Workstream 2 is intended to enhance dynamic risk assessment capability through two Initiatives. Initiative 2A aims to improve systems and processes through dynamic risk assessment practices. Initiative 2B will seek to introduce and integrate the concept of “dynamic risk assessment” into training and hazard assessments.</p> <p>In addition, Workstream 5 is intended to mature SoCalGas as a learning organization through four initiatives. Initiative 5A is designed to refine and implement leadership training to expand management influence on advancing and enhancing safety culture. Initiative 5B is designed to enhance</p>
<p>Most interviewees described SoCalGas as a good company, with good compensation, and good employees.</p>		
<p>Interviewees indicated that Sempra and SoCalGas value diversity and inclusion in their organizations.</p>		
<p>Contractor interviewees perceive that SoCalGas has a lot of trust in them and that the contractors work well with the SoCalGas crews.</p>		
<p>Observations indicated several examples where SoCalGas leaders did not monitor for behaviors that can have a negative impact on the work environment and address them promptly.</p> <ul style="list-style-type: none"> <li>• Inconsistent use of PPE even in training areas, e.g., instructor working with bore without safety gloves, goggles not worn by those working next to welders in shop, observers had to request hearing protection in area where there was jack hammering, use of hand saw without safety gloves.</li> <li>• Individuals working excessive overtime in safety sensitive positions, e.g., safety field representatives.</li> <li>• During unannounced observation facilities were identified that were not conducive to a safe environment and housekeeping was not maintained.</li> </ul>		
<p>While SoCalGas interviewees indicated that they are told to voice concerns, provide suggestions, and raise questions, they also indicated that they were intimidated to do so, e.g. would not stop a whole job, but perhaps just a task because they felt they had to protect the company over themselves.</p>		
<p>SoCalGas interviewees indicated that trust is not fostered among many individuals and work groups across the organization.</p> <ul style="list-style-type: none"> <li>• There is a perception of a blame culture among many individuals and behaviors are generally driven by trying to deflect responsibility, e.g., lack of trust in new supervisors to make the right decisions and employees are hesitant to make them for fear of being blamed if something goes wrong.</li> <li>• The use of Behavioral Based Safety (BBS) is focused on working with individuals who are perceived to be a risk and may create blind spots for the organization; the blame becomes assigned to an individual.</li> </ul>		

<ul style="list-style-type: none"> <li>• Employees describe documenting verbal instructions given by supervisors who can override a policy to protect themselves if the decision is incorrect and the supervisor denies giving the instruction.</li> <li>• Management interviewees indicated a desire to take the blame and discipline out of the equation when an event occurred to get to the root cause. This is in direct contrast to the perception of employees as to what happens.</li> </ul>	<p>the objectives of the sessions.</p> <p>7. Incorporate the broader concept of safety e.g. include examples of public safety, security, into safety items on meeting agendas, in tailgates, in job hazard assessments, newsletters, etc.</p> <p>8. Conduct dialogue sessions with representatives from field personnel across business units on how to best communicate field-based experiences upward in the organization.</p> <p>9. Develop new guidance through conversations on how to make better decisions when rule-based behavior does not work. Conversations can be centered around different real life scenarios that involved</p>	<p>existing enterprise training to focus on comprehensive safety and promote interdisciplinary transparency and collaboration. Initiative 5C is designed to develop and implement an Executive Safety Leadership Program to introduce and explore safety culture concepts and potential application to SoCalGas. Initiative 5D is designed to assess existing internal and external organizational learning practices that advance safety culture and performance, and explore concepts and practical approaches that may be deployed within SoCalGas. Each of these four initiatives is intended to support an environment of learning, in which employees feel that a questioning attitude is valued and that concerns will be acted upon.</p> <p>Other Plan Initiatives also address aspects of these</p>
<p>Interviewees at all organizational levels in SoCalGas recognize the existence of silos and the need to build better collaboration and interaction between groups. Interviewees also described a lack of trust of SoCalGas on the part of the public and a poor understanding of the importance of gas in the energy mix.</p>		
<p>SoCalGas respondents to the survey also indicated lower perceptions around the trust between management and staff and between work groups.</p>		
<p>SoCalGas respondents from 9 of the different locations identified scored lower on their overall perceptions around safety on more than half of the dimensions assessed. These locations included Aliso Canyon, Aliso Viejo, Fontana, Glendale, Monterey Park, Palm Desert, Pico Rivera, Redondo Beach (182nd St. Base) and Visalia.</p>		
<p>Aliso Canyon respondents to the Safety Culture Perception Survey scored lower on all of the 10 dimensions assessed. Respondents from Honor Rancho actually had the lowest scores on all of the dimensions</p>		
<p>Survey respondents from both above ground and below ground storage facilities and respondents identified from gas transmission had overall lower perceptions than other groups around the dimensions of safety.</p>		

	<p>judgements in the field that were not covered in policies.</p> <p>13. Train managers and personnel to think about potential, unexpected, and unknown conditions, the “what if” this happened situations, to enhance individual accountability and to detect latent safety hazards.</p>	<p>cultural facts, traits, conclusions, and recommendations. For example, Workstream 4’s Safety Management System enhancements are designed to enhance organizational learning and integration.</p>
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**Overarching Theme 3 – Resources are needed to promote a healthy safety culture.**

<b>Cultural Fact</b>	<b>2EC-Identified Traits, Conclusions, and Related Recommendations</b>	<b>SoCalGas Plan</b>
SoCalGas Safety Culture Perception Survey respondents had a positive perception of the work processes.	<p><u>Trait</u></p> <p><i>Work Processes:</i> The process of planning and controlling work activities is implemented so that safety is maintained.</p> <p><i>Effective Safety Communication:</i></p>	<p>Broadly, SoCalGas’s Plan is intended to address these cultural facts through further evaluation and enhancement to existing processes and systems, empowering and enabling employees to manage risk, enterprise-wide Plan reach, two-way dialogues and</p>
Most survey respondents for both SoCalGas and Sempra indicated that there was a low level of risk-taking behaviors in their organizations.		
Some management interviewees at SoCalGas indicated that they believe that about 95% of jobs are done correctly the first time.		
Many SoCalGas interviewees described policies being good for the most part and that the company allows employees dedicated time to review policies.		
Some Senior Management interviewees at SoCalGas perceive that the SED of CPUC trusts them and their engineering work enough to ask for their engineering advice.		

<p>Contractor interviewees indicated that they use SoCalGas procedures because they perceive them to be correct and helpful.</p>	<p>Communications maintain a focus on safety</p>	<p>engagement-oriented communications, and inclusion of contractors within the scope of the Plan.</p>
<p>SoCalGas interviewees indicated that SoCalGas Management is all about budget and that each year the instructions are given to do more with less, 3% less each year to meet the Incentive Compensation Plan (ICP) budget.</p> <ul style="list-style-type: none"> <li>• Perception that there are two cultures, what management says and what management does.</li> <li>• There is the belief that there is a real disconnect between management making the decisions and the people having to do the work. Results from the Safety Culture Perception Survey indicated consistent differences between manager and director perceptions with frontline workers (the closer you get to managing the hazards the less positive the perceptions).</li> <li>• Many interviewees expressed the opinion that money goes to capital expenditures more than to O &amp; M costs, like safety. Capital expenditures are more often described as related to risk, again reflecting the perception that safety is more narrowly defined.</li> <li>• Interviewees indicated that the more management saves on budget, the better their bonus.</li> <li>• Some interviewees indicated that since safety is part of performance appraisal, managers don't want close calls reported unless it is done anonymously.</li> <li>• Interviewees described attempts at cost saving in emergency response. The Automated Roster Callout System, ARCOS, was frequently reported as slowing response time and not getting appropriately trained personnel on site. Interviewees tended to support more at station or on-call staffing for emergency response.</li> </ul>	<p style="text-align: center;"><u>Related Conclusions</u></p> <p><i>Decision-Making and Work Processes:</i> Staffing issues were described by interviewees at a number of SoCalGas locations. Concerns were often raised around fatigue, overtime, emergency response systems, replacement of employees, loss of field experience workers and their expertise, the increased use of subcontractors, and the lack of field experience of supervisors and planners. Some workers reported that they are often not equipped to make the kind of policy and procedure interpretations necessary in complex and unexpected field conditions. This does not lead to a list to be fixed but suggests that the culture that has led to these concerns has not prioritized safety.</p>	<p>SoCalGas's approach includes frequent, focused communication by leadership, as well as sustained use of two-way communications as described above. Further, external communications to customers and to the public will convey SoCalGas's holistic view of safety, highlight actions SoCalGas is taking to protect public safety, system safety, and personnel safety, and provide information about the public's role in safety including guidance on raising safety concerns to SoCalGas's attention. Communications to contractors will largely mirror internal communications in terms of content, and SoCalGas intends to continue</p>
<p>The perception of many SoCalGas interviewees is that management does not ensure that staffing levels are consistent with the demands related to maintaining safety and reliability.</p> <ul style="list-style-type: none"> <li>• Documentation indicates that staffing levels in risk assessment areas are low (DR 08 Q01 Attach.02, Appendix D).</li> <li>• About 33% of SoCalGas Safety Culture Perception Survey respondents did not agree with the statement that staffing levels in the company reflect safety as a priority.</li> <li>• The issue of staffing was identified most frequently by survey respondents who provided comments.</li> </ul>		

<ul style="list-style-type: none"> <li>• Interviewees at some bases indicate that they have only one employee working alone on tasks that typically would require a buddy system.</li> <li>• Interviewees indicated that overtime is often used to overcome staff shortages and has created a fatigue issue among many SoCalGas employees.</li> <li>• The reliance on contractors (60% versus 40% SoCalGas) is also perceived by SoCalGas interviewees as a way to save costs by reduced staffing levels especially when used for capital construction work.</li> <li>• Interviewees indicated the belief that everything that can be, is initially capitalized in order to get a return on investment. This does not put more money into O&amp;M budgets that are directly related to safety.</li> <li>• Many groups across multiple bases expressed staffing level issues.</li> <li>• Interviewees expressed the idea that even though positions are open, they are not filled until the end of the fiscal year so that the money can be used for other things.</li> <li>• Interviewees also indicated that the time to replace open positions is a long process with posting, selection, and then training taking sometimes as much as a year.</li> <li>• Interviewees indicated that scheduling does not work well because they are short staffed; the lack of coordination between Planners and Distribution then creates a domino effect on work planning.</li> <li>• The on-call requirements vary from base to base, in some they are voluntary, others they are part of the job, and in others it becomes mandatory overtime.</li> </ul>	<p><i>Effective Safety Communication:</i> Current safety communication is limited in several ways. Safety is conceptualized narrowly, and interviewees talked almost exclusively about personnel safety. Less of the training, meetings, and messages consider public and security risks. Little upward communication exists to identify field-based experiences that create potential public risks including things like effects of staffing, supervisor experience, overtime and fatigue, and knowledge transfer.</p>	<p>engaging with our unions on this effort.</p> <p style="text-align: center;"><u>Workstreams and Initiatives</u></p> <p>Workstream 1 is intended to build and operationalize a comprehensive understanding of safety across the organization through three Initiatives. Initiative 1A involves leadership dialogues to define and implement a more comprehensive concept of safety with guidance from an external expert. Initiative 1B involves creating a shared understanding of safety through an enterprise-wide communication plan, with focus on two-way engagement with stakeholders. And Initiative 1C involves reviewing and updating documents, processes, and communications to reflect a comprehensive view of safety.</p>
<p>Interviewees at SoCalGas indicated that multiple departments are doing the same work with different processes because of silos between groups and differential access to programs; The Pipeline Safety Enhancement Plan PSEP is helping to address the problem by creating a uniform platform for these different programs but has still not been well integrated across the SoCalGas organization. (D6)</p>	<p><u>Related Recommendations</u></p>	
<p>SoCalGas interviewees reported that sometimes tools, equipment, procedures and other resource materials are not available to support successful work performance.</p> <ul style="list-style-type: none"> <li>• Interviewees indicate that many bases have older equipment that decreases the efficiency and reliability of their work, e.g., meter leak testing takes double the time because of old equipment.</li> </ul>	<p>3. Conduct dialogue sessions with all levels in the organization to create a shared</p>	

<ul style="list-style-type: none"> <li>• Interviewees across the organization describe outdated and slow Information Technology systems. Respondents on the Safety Culture Perception Survey also identified this as one of the most frequent comments.</li> <li>• Interviewees at bases indicated that many of their vehicles are old and in poor condition, creating not only work issues, but perceived safety issues for personnel.</li> </ul>	<p>understanding of the assessment results and what comprehensive safety means for each business and organizational unit. The objective of these sessions would be two-fold; 1) self-reflection of the culture based on the results, 2) capture the organizations intelligence and creativity on how to recover the areas in need of attention. Action items should result from the dialogue sessions that will meet the objectives of the sessions.</p> <p>4. Establish methods for managers to enhance the understanding, skills and enactment on how their leadership can influence the safety culture positively e.g. empowerment, listening rather than</p>	<p>Workstream 2 is intended to enhance dynamic risk assessment capability through two Initiatives. Initiative 2A aims to improve systems and processes through dynamic risk assessment practices. Initiative 2B will seek to introduce and integrate the concept of “dynamic risk assessment” into training and hazard assessments.</p> <p>Workstream 3 is intended to optimize SoCalGas’ safety operating model through three initiatives. Initiative 3A will evaluate resource allocation to validate technology, staffing, and equipment support safety and risk management goals. Initiative 3B will evaluate and enhance safety capabilities and organizational structure to promote safety management objectivity and controls. Initiative 3C</p>
<p>SoCalGas does not always create and maintain complete, accurate and up-to-date documentation.</p> <ul style="list-style-type: none"> <li>• Documentation from inspections by SED of the CPUC found violations with documentation and updates to procedures (Q5.3 Attach. 46-50/26-29, Appendix D).</li> <li>• Documents also indicated that emergency evacuation plans were missing at several compressor stations (Q5.3 Attach. 20, Appendix D). (D5)</li> <li>• At the time of review in this assessment, the Operations Standard for the investigation of accidents and pipeline failures, e.g., reportables, piping failures detrimental to safety, accidents/failures considered significant by local operating organizations (Q06.1 Attach. 01, Appendix D) had last been updated almost 5 years ago. (D5,6)</li> <li>• Interviewees indicated that the criteria for the activation of the Emergency Operations Center while in the standards, is constantly changing and not always recognized by those involved in emergency response. Our observations of the Emergency Operations Center also revealed a lack of clarity among staff.</li> <li>• Observations indicated no reference to procedures during training simulations.</li> <li>• Interviewees indicated that inactive gas lines when discovered are not documented for future reference.</li> <li>• Interviewees described that there are main gas lines without test records and consequently the CPUC requires leak surveys in those areas. (D5)</li> <li>• Interviewees describe problems with different interpretations of policies between supervisors and technicians.</li> <li>• Many interviewees expressed that new standards and policies come by email and they miss the meetings that would occur on policy reviews and provide opportunities for a dialogue around the changes.</li> </ul>		

<ul style="list-style-type: none"> <li>• Interviewees gave examples of individuals working on the same project using different revisions of the same procedure and thinking they were working on the same one.</li> <li>• Observations in the field and interviewees indicated that maps are often not up to date.</li> </ul>	<p>telling, learner mind-set.</p>	<p>will seek to obtain advice for implementing a systematic approach to safety and improving safety culture through the SoCalGas Advisory Safety Council.</p>
<p>Some interviewees at SoCalGas indicated that certain work processes do not always include the identification and management of risk commensurate to the work.</p> <ul style="list-style-type: none"> <li>• Interviewees indicated that the criterion for conducting any type of causal analysis related to an incident is subjective and decided by conversation ('If something happens that we don't want to happen again then we conduct causal analysis').</li> <li>• Interviewees indicated that the criteria to conduct any type of Incident Investigation are initially determined by local management.</li> <li>• Interviewees explained that the department or unit that finds an anomaly does their own local assessment, and that it is often not communicated to other supervisors and employees. (D8)</li> <li>• Interviewees indicated that there is no Senior Management review (Corrective Action Review Board) of the causal analysis or the corrective actions to be taken on. Interviewees indicated that there is no centralized Quality Assurance function; different groups have their own function and report to different managers. (D8)</li> <li>• Distribution and parts of transmission are shared services with SDG&amp;E and therefore reporting to two CEOs and two Board of Directors which leaves responsibilities and priorities unclear.</li> </ul>	<p>5. Analyze the resource allocations and competence levels to assure safety and reliability.</p> <p>6. Provide training to the entire organization with practical examples unique for each department on how the new shared understanding of safety and safety culture to the organization will change the way business is done and why it is important to make the change. This training can be incorporated into existing programs.</p>	<p>Workstream 4 is intended to enhance SMS integration at SoCalGas through three initiatives. Initiative 4A is designed to evolve the current "Incident Evaluation Teams" model into "Event Learning Teams" incorporating dialogue, feedback, and follow-up. Initiative 4B will develop a technology roadmap to support a more integrated and comprehensive view of safety information. Initiative 4C will expand the Safety Incident Management System to take a more comprehensive approach to potential threats and risks.</p>
<p>About 10% of the SoCalGas Safety Culture Perception Survey respondents indicated disagreement with how work planning was being conducted and the extent to which time frames for completing work were realistic. Interviewees involved in construction and repair expressed the most frustration</p>	<p>8. Conduct dialogue sessions with representatives from field personnel across business units on how</p>	
<p>Leaders frequently communicate and reinforce the expectation that safety is the organization's priority.</p> <ul style="list-style-type: none"> <li>• There are multiple documents concerning COVID protocols, the Safety Management System, required safety training, etc. (Q02.12 Attachments, Appendix D).</li> </ul>		

<ul style="list-style-type: none"> <li>• The Incident Command System was set up for COVID and communication with the field and stakeholders occurred within 48 hours of any significant events.</li> <li>• There are multiple videos concerning leadership commitment, safe driving procedures, Safety Management System Framework and Safety Values (Q02.12 Attachments, Appendix D). (D8)</li> <li>• There are multiple health bulletins describing the use of hard hats, fall protection, driving policy, etc.</li> <li>• Interviewees describe Town Hall meetings as open and useful.</li> <li>• Many interviewees indicated that they had monthly safety meetings, yearly safety stand downs at their base and annual safety training. (D8)</li> <li>• Observations of two Virtual Safety Congresses, one for SoCalGas Employees and one for SoCalGas Contractors, emphasized Leadership’s expectations around safety.</li> <li>• Observations indicated that many meetings begin with a safety message.</li> <li>• Observations in the field demonstrated that safety briefings were conducted for observers in most, but not all, situations; Observers typically received a Job Hazards Assessments briefing and attended safety tailgates after which they signed on to an acknowledgement form. (D8)</li> </ul>	<p>to best communicate field-based experiences upward in the organization.</p> <p>11. Evaluate existing reporting systems to determine how they can be integrated and operated from a unified platform. For example incidents from personnel safety should not be in one system and those for gas leaks or pipeline issues in another.</p> <p>12. Ensure that all potential threats, near misses, close calls, etc. are identified, evaluated, tracked and trended so they can be proactively used to mitigate any potential risks. All types of safety should be included in this activity. (D9)</p>	<p>Other Plan Initiatives also address aspects of these cultural facts, traits, conclusions, and recommendations, as described therein.</p>
<p>Sempra Energy has a Safety Summit for the CEOs and COOs of its operating companies. (D1,8)</p>		
<p>Executive interviewees from Sempra and SoCalGas described direct communication, healthy debate, in their Board rooms to create a culture that can trickle down into their organizations. (D)</p>		
<p>Observations indicated that SoCalGas and Sempra Executives are always in the communication loop around events, e.g., involved in situational awareness call; can communicate with each other through calls during an emergency response. (D1,8)</p>		
<p>SoCalGas and Sempra respondents to the Safety Culture Perception Survey had a positive perception of safety communication in their organizations.</p>		
<p>Documentation from SoCalGas reviewed did not include information regarding any formal direct processes surrounding public input on safety and environmental issues (Q02.11 Attach.01).</p>		

<p>As previously noted, most communication around safety is regarding personnel safety.</p>		
<p>Interviewees at SoCalGas indicated that internet and/or cell phone connectivity in the field at some locations is problematic making response time difficult and impacting the review of policies, processes, and procedures.</p>		
<p>Interviewees at SoCalGas indicated that the Vice President level and above are not included on the Incident Management System; Directors can access their monthly data (metrics) themselves. (D3)</p>		
<p>The free flow of information, openly and candidly, both up and down and across the organization and with external stakeholders is not perceived at all levels of the SoCalGas organization.</p> <ul style="list-style-type: none"> <li>• Interviewees described the need for better communication and collaboration with municipalities and customers, e.g., sharing of maps between utilities, coordinating with building contractors, better public relations with customer base.</li> <li>• Senior management interviewees perceive good upward communication in the organization which they attribute to psychological safety, listening, acting on reports; middle managers indicated a lack of dialogue with upper management, and few interviewees in lower levels of the organization knew anything about this assessment.</li> <li>• Many interviewees in lower levels of the SoCalGas organization did not know about SMS or recognize the placard that had been distributed.</li> <li>• While town halls were described by interviewees as a positive mechanism of communication, they also indicated that they could not fix local problems, and that meetings at their level would be better. (D8)</li> <li>• Interviewees describe a need for better and clearer communication between groups so as not to create issues in work, e.g., job was thought to be an extension of a main line but was really a service job.</li> <li>• Interviewees described a competitive atmosphere between departments (silos) that creates barriers to a healthy flow of information.</li> </ul>		
<p>SoCalGas respondents to the Safety Culture Perception Survey who identified as members of a union were less positive in their responses to questions addressing communication around safety.</p>		
<p>Many SoCalGas respondents to the survey were not aware that contractors are involved in safety discussions.</p>		

**Overarching Theme 4 - Learning and safety improvement require an integrated management system.**

Cultural Fact	2EC-Identified Traits, Conclusions, and Related Recommendations	SoCalGas Plan
SoCalGas has documentation describing processes around continuous improvement goals, lessons learned. (SPD-02).	<p style="text-align: center;"><u>Trait</u></p> <p><i>Organizational Learning:</i> Opportunities to learn about ways to ensure safety are sought out and implemented.</p> <p><i>Problem Identification and Resolution:</i> Issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.</p> <p style="text-align: center;"><u>Related Conclusions</u></p> <p><i>Continuous Learning and Problem Identification and Resolution:</i> The lack of adequate knowledge capture and transfer processes came up often in the SoCalGas interviews.</p>	<p>Broadly, SoCalGas’s Plan is intended to address these cultural facts through further evaluation and enhancement of our Safety Management System activities and processes, extensive and learning focused training opportunities, creation of a robust accountability model framework, enterprise-wide Plan reach, and two-way dialogues and engagement-oriented communications.</p> <p>As described in the Plan, SoCalGas has identified and will continue to identify metrics, milestones, and indicators that will help to identify progress and challenges in our evolving safety culture. Metrics and other indicators will require time</p>
Sempra and SoCalGas respondents to the Safety Culture Perception Survey had positive perceptions of continuous learning.		
<p>SoCalGas provides training to maintain a knowledgeable, competent workforce and instill safety values.</p> <ul style="list-style-type: none"> <li>• Observations indicated ongoing innovations in training technology.</li> <li>• Learning by doing at the Situation City complex engages students and is provided by experienced instructors.</li> <li>• Interviewees expressed the opinion that ride-alongs are an important part of learning.</li> <li>• Some managers indicate that the purpose of training for SoCalGas is to make it a better learning organization.</li> <li>• Some managers believe that training is more valued now than it used to be.</li> </ul>		
SoCalGas interviewees indicated that there is a greater understanding and appreciation of the need for good data and monitoring after the San Bruno event. (D4)		
SoCalGas benchmarks with PG&E and SDG&E to learn about contractor incidents. (D6)		
SoCalGas shares information as part of Sempra’s Enterprise Dashboard on safety and upstream indicators for downstream performance. (D8)		
<p>Documentation indicates that SoCalGas metric reports are driven by CPUC requirements. While various Incident Evaluation Process documents (IEPs) discuss causal factors, none of the analyses conducted looked at extent of condition or cause. Such analysis is valuable for looking at systemic issues that if corrected can prevent future occurrence. (D5,9)</p> <ul style="list-style-type: none"> <li>• IEP 20-023 was attributed to a calculation error where the guidance was unclear.</li> </ul>		

<ul style="list-style-type: none"> <li>• IEP 18-004 was attributed to a planner who did not correctly interpret the requirements.</li> <li>• IEP 17-028 was a late reporting event to the CPUC because Gas 183.05 Standard lacked clarity on timing and had unclear roles and responsibilities.</li> <li>• Interviewees describe the root cause analysis process as poor and arbitrary.</li> </ul>	<p>Part of this appears to arise from the silos where learning is not shared across levels and divisions. But it comes also in the employee replacement processes, the lack of adequate reporting and analysis of close calls/near misses, and event investigations. The lack of leading indicators makes identification of evolving problems difficult and adds to the reactivity of the compliance mindset.</p> <p><u>Related Recommendations</u></p> <p>4. Establish methods for managers to enhance the understanding, skills and enactment on how their leadership can influence the safety culture positively e.g. empowerment, listening rather than telling, learner mindset.</p>	<p>to set up adequate data collection processes and generate baselines before they can indicate the intended benefits.</p> <p><u>Workstreams and Initiatives</u></p> <p>Workstream 2 is intended to enhance dynamic risk assessment capability through two Initiatives. Initiative 2A aims to improve systems and processes through dynamic risk assessment practices. Initiative 2B will seek to introduce and integrate the concept of “dynamic risk assessment” into training and hazard assessments.</p> <p>Workstream 3 is intended to optimize SoCalGas’ safety operating model through three initiatives. Initiative 3A will evaluate resource allocation to validate technology, staffing, and equipment support safety and risk</p>
<p>SoCalGas respondents to the Safety Culture Perception Survey indicated fewer positive responses to the statement around the development of leadership skills.</p>		
<p>Documents from SoCalGas safety culture surveys conducted in 2013, 2016 and 2018 consistently indicated poor perceptions regarding lockout/tagout procedures and safety committee effectiveness. An effective organizational response was not identified.</p>		
<p>Metrics presented for the SoCalGas dashboard were compartmentalized into System, Safety and Operations without any integrated or systemic parameters which could facilitate more proactive responses to the data. Observations of an emergency exercise indicated a lack of self-criticality in the ‘hot wash’ (debriefing) of the activity. (D9)</p>		
<p>Interviewees indicated that after the Aliso Canyon event when everything was stopped irregularities occurred with the infrastructure that continue to date and necessitate additional work as a result.</p>		
<p>Many interviewees when asked what lessons were learned from the Aliso Canyon event express the opinion that the most important learning was the importance of better communication with the public to avoid poor public relations. (D4)</p>		
<p>Many interviewees at SoCalGas indicated that the organization has not developed and effectively implemented knowledge transfer and knowledge retention strategies.</p> <ul style="list-style-type: none"> <li>• Interviewees perceive that the lack of a knowledge transfer process is a risk to the company.</li> <li>• Interviewees indicated that knowledge transfer is not documented.</li> <li>• Interviewees indicated that some individuals get hired without experience, don’t always get training, and then get promoted.</li> </ul>		
<p>Respondents from SoCalGas to the Safety Culture Survey indicated frequently in their comments that an effective knowledge transfer process was needed.</p>		

<p>Interviewees at SoCalGas that the two areas with very specific qualifications that have been the hardest to find contractors in are gas storage and pipeline construction.</p>	<p>6. Provide training to the entire organization with practical examples unique for each department on how the new shared understanding of safety and safety culture to the organization will change the way business is done and why it is important to make the change. This training can be incorporated into existing programs.</p> <p>10. The ‘new’ comprehensive concept of safety that is to be developed will dictate that certain functions that support and facilitate a healthy safety culture be centralized across the organization to ensure alignment, consistency, and learning. Examine the role of functions like Quality Assurance, Incident Investigation,</p>	<p>management goals. Initiative 3B will evaluate and enhance safety capabilities and organizational structure to promote safety management objectivity and controls. Initiative 3C will seek to obtain advice for implementing a systematic approach to safety and improving safety culture through the SoCalGas Advisory Safety Council.</p> <p>Workstream 4 is intended to enhance SMS integration at SoCalGas through three initiatives. Initiative 4A is designed to evolve current the “Incident Evaluation Teams” model into “Event Learning Teams” incorporating dialogue, feedback, and follow-up. Initiative 4B will develop a technology roadmap to support a more integrated and comprehensive approach to safety information. Initiative 4C</p>
<p>Interviewees at SoCalGas indicated that they do not believe they are getting all the training experience needed to learn; a lot is on-line and self-study and sometimes not sure if you are really trained for the job; desire for more training instead of learning by making mistakes in the field.</p>		
<p>Many interviewees expressed the opinion that SoCalGas is a reactive organization. (D5,6)</p> <ul style="list-style-type: none"> <li>• Interviewees described the belief that things only change after something has happened.</li> <li>• Interviewees expressed the need to get more information on close calls since often they don’t get it in a timely manner because of investigations.</li> </ul>		
<p>Documentation indicates that Sempra conducts audits across the SoCalGas organization.</p>		
<p>Interviewees indicated that SoCalGas is working on a mobile application for reporting near misses in real time. (D3)</p>		
<p>Interviewees indicated that 14 current SoCalGas applications are being replaced with one common platform; questions about the transition between systems remain.</p>		
<p>Interviewees indicated that CPUC approved funding for everything requested that is safety related, reliability is sometimes rejected.</p>		
<p>SoCalGas has not implemented a program with a low threshold for identifying issues from within its own organization.</p> <ul style="list-style-type: none"> <li>• Documents identify a valve that was inoperable for a year (5478-5481 Q.05.3) when CPUC was forced to inspect, and the corrective actions were driven by CPUC not SoCalGas. (D5)</li> <li>• Documents reveal multiple CPUC inspections where the corrective actions were externally driven, e.g., upgrade procedure to be consistent with exposed pipe regulation; went from SED to SoCalGas and then back to SED to accept. (D5)</li> <li>• Valve inspections not done as required by schedule because of failure by SoCalGas to submit ‘a compliance work order’; when identified by CPUC, immediately done, and then accepted by SED (Q5.3 – Series of attachments). (D5)</li> </ul>		

<ul style="list-style-type: none"> <li>Interviewees indicated that a lot of work is driven by the CPUC, e.g., the annual review of policies was ordered by the CPUC, locate and marks, replacements.</li> <li>Executive Managers indicated that SoCalGas near miss reporting could be better.</li> </ul>	<p>Safety from an integrated perspective.</p> <p>11. Evaluate existing reporting systems to determine how they can be integrated and operated from a unified platform. For example incidents from personnel safety should not be in one system and those for gas leaks or pipeline issues in another.</p> <p>12. Ensure that all potential threats, near misses, close calls, etc. are identified, evaluated, tracked and trended so they can be proactively used to mitigate any potential risks. All types of safety should be included in this activity. (D9)</p> <p>13. Train managers and personnel to think about potential, unexpected, and unknown conditions,</p>	<p>will expand the Safety Incident Management System to include a more comprehensive approach to potential threats and risks.</p> <p>Workstream 5 is intended to mature SoCalGas as a learning organization through four initiatives. Initiative 5A is designed to refine and implement leadership training to expand management influence on advancing and enhancing safety culture. Initiative 5B is designed to enhance existing enterprise training to focus on a comprehensive approach to safety and promote interdisciplinary transparency and collaboration. Initiative 5C is designed to develop and implement an Executive Safety Leadership Program to introduce and explore safety culture concepts and potential application to SoCalGas. Initiative 5D is designed to assess existing internal and external</p>
<p>Senior Managers indicated that SoCalGas employees fill out a form when an event occurs; most frontline employees indicated that they call their supervisor to fill out the form.</p>		
<p>SoCalGas Interviewees indicated that suggestions for improvements take too long to get a response, or they do not receive a clear response.</p>		
<p>SoCalGas respondents to the Safety Culture Perception Survey who identified as members of a union had a less positive perception of problem identification and resolution than respondents who identified as non-union members.</p>		
<p>SoCalGas respondents who identified as working at Aliso Canyon had a significantly lower average score on problem identification and resolution than the overall average SoCalGas score.</p>		

	<p>the “what if” this happened situations, to enhance individual accountability and to detect latent safety hazards.</p>	<p>organizational learning practices that advance safety culture and performance and explore concepts and practical approaches that may be deployed within SoCalGas. Each of these four initiatives is intended to support an environment of learning, in which employees feel that a questioning attitude is valued and that concerns will be acted upon.</p> <p>Other Plan Initiatives also address aspects of these cultural facts, traits, conclusions, and recommendations, as described therein.</p>
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