STATE OF CALIFORNIA GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



December 3, 2020

TO: STAKEHOLDERS TO 2021 SAFETY CULTURE ASSESSMENTS

Enclosed are the Draft Safety Culture Assessment (SCA) Requirements of Electrical Corporations. The Draft SCA Requirements of Electrical Corporations presents the Wildfire Safety Division's (WSD) draft requirements for the first annual SCA process in 2021. This document provides guidance as to how the WSD plans to conduct its SCA, including a workforce survey, self-assessment, supporting documentation, and interviews. This document also provides guidance as to which electrical corporations shall complete each requirement.

In designing these SCA requirements, the WSD reviewed input from the public and the Wildfire Safety Advisory Board as well as lessons learned from other safety culture assessments.

The Draft SCA Requirements of Electrical Corporations is presented to stakeholders for public comment. The WSD plans to review and incorporate public comments in late December 2020 and release final requirements and submission deadlines for electrical corporations in early 2021.

Stakeholders may submit comments to the Director of the Wildfire Safety Division on the Draft SCA Requirements of Electrical Corporations by December 18, 2020. Comments should be submitted to the following email address: wildfiresafetydivision@cpuc.ca.gov. Stakeholders submitting comments on the Draft SCA Requirements of Electrical Corporations must also serve their comments on the service list of Rulemaking (R.)18-10-007. Comments that are not served on the service list of R.18-10-007 may not be considered.

The WSD requests that comments include input on which elements of the SCA would best apply to Small and Multijurisdictional Electrical Corporations (SMJUs) and Independent Transmission Owners (ITOs).

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For questions regarding the guidance provided in this letter, please contact Melissa Semcer, Program Manager in the Wildfire Safety Division, at melissa.semcer@cpuc.ca.gov, with a copy to wildfiresafetydivision@cpuc.ca.gov.

Sincerely,

Caroline Thomas Jacobs

Director, Wildfire Safety Division

California Public Utilities Commission

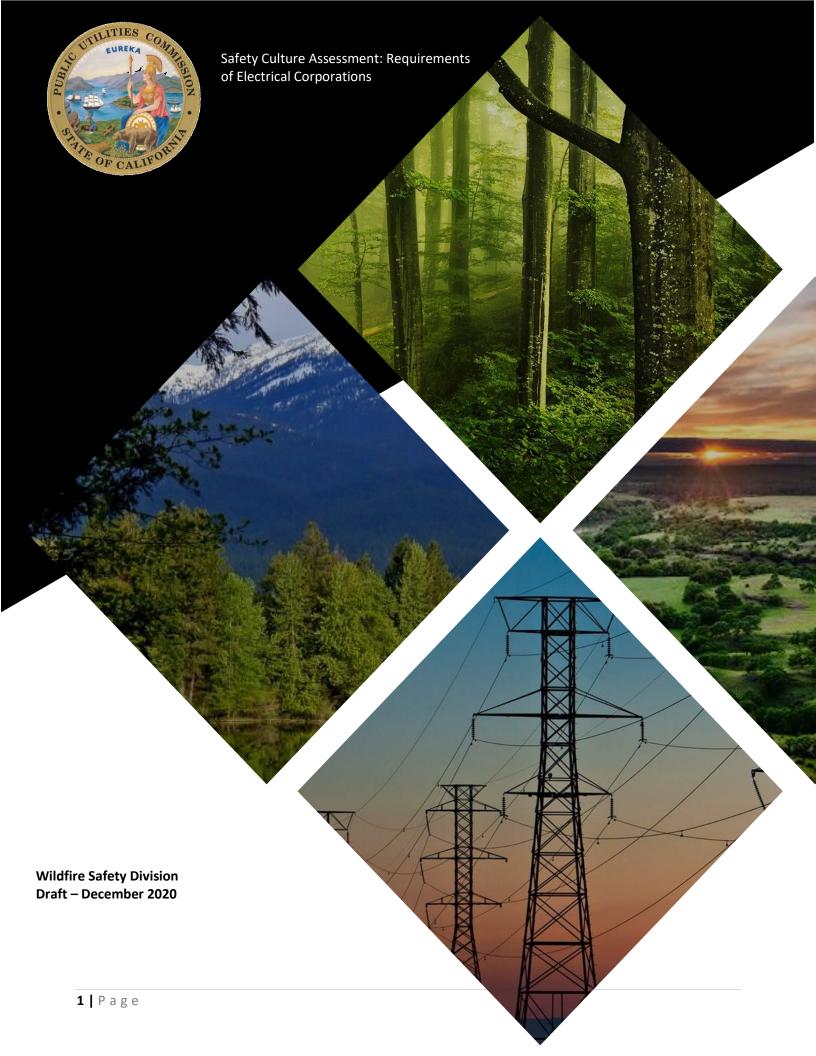


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Executive Summary

The Wildfire Safety Division's (WSD) Requirements of Electrical Corporations contain the requirements for the first annual Safety Culture Assessment (SCA) process in 2021. The requirements are built upon the safety culture framework adopted by the Commission on November 19, 2020 in Resolution WSD-011.

To ensure that the WSD's Safety Culture Assessment is distinct from other safety culture assessments, the WSD has developed an initial understanding of what utilities have already completed and determined a strategy to complement existing assessments. The WSD's Safety Culture Assessment will be specific to wildfire safety. The WSD and the Commission will strive for coordination, including sharing learnings and processes, between the WSD's Safety Culture Assessment and the Commission's broader safety culture assessment required by Public Utilities Code §8386.2, such that the assessments of safety culture in a wildfire context and safety culture overall may be complementary and mutually informative. The WSD will work with the Commission to ensure this collaboration can continue after the WSD transitions to the California Natural Resources Agency (CNRA) and that process updates can continually improve the WSD's Safety Culture Assessment. The WSD will also build upon principles of safety culture identified in past Commission safety culture assessments (e.g., Pacific Gas & Electric¹), such as certain minimal expectations for utility safety culture.

Furthermore, each electrical corporation may conduct its own internal safety culture assessment in addition to the WSD's assessment. This safety culture assessment might measure additional elements most relevant to that electrical corporation's context and might not be focused exclusively on wildfire. The WSD's assessment of safety culture is intended to be complementary to, and not a replacement for, ongoing work to improve safety culture at each electrical corporation.

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

The Requirements of Electrical Corporations consists of five sections:

1. Electrical corporations to which requirements apply

This section contains an overview of the Wildfire Safety Division's Safety Culture Assessment requirements, together with guidance on which electrical corporations shall complete each requirement.

¹ I.15-08-019, Order Instituting Investigation on the Commission's Own Motion to Determine Whether Pacific Gas and Electric Company and PG&E Corporation's Organizational Culture and Governance Prioritize Safety

2. Workforce Survey

As a component of the Safety Culture Assessment, the WSD plans to conduct a workforce survey for electrical corporation employees, supervisors, managers and contractors who are engaged in wildfire hazard mitigation activities. This section details the components and principles of the workforce survey.

3. Self-Assessment

The organizational self-assessment will be applied by the WSD to track each electrical corporation's organizational culture over time. In 2021, the WSD will require the electrical corporations to assess their current state on various safety culture elements and to project where they anticipate they will be on these elements by the end of 2022. This section details the self-assessment questions and requirements for electrical corporations. Furthermore, the WSD will require electrical corporations to describe in the self-assessment their justification for their 2021 self-rating in the Supporting Documentation section below.

4. Supporting Documentation

If requested by the WSD, electrical corporations shall complete the supporting documentation requirement to further justify and validate their self-assessment submission. Requests for supporting documentation in 2021 are at the WSD's discretion. Potential supporting evidence that WSD can request is included in this section.

5. Interviews

Each electrical corporation shall, at the WSD's request, make itself available for interviews and observations.





1

Requirements of electrical corporations

- <u>1</u> Requirements of electrical corporations
- 1.1 Electrical corporations to which requirements apply
- 1.2 Workforce survey
- 1.3 Self-assessment
- 1.4 Supporting documentation
- 1.5 Interviews

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1 Requirements of electrical corporations

1.1 Electrical corporations to which requirements apply

Not every requirement will apply to every electrical corporation. An overview of the Wildfire Safety Division's (WSD) Safety Culture Assessment (SCA) requirements, together with guidance on which electrical corporations shall complete each requirement, is below.

Note that electrical corporations are categorized as follows for this purpose:

- Large electrical corporations ("Large IOUs"): Pacific Gas and Electric Company, San Diego Gas & Electric, Southern California Edison Company
- Small and multijurisdictional electrical corporations ("SMJUs"): Liberty Utilities (CalPeco), PacifiCorp, Bear Valley Electric Service, Inc.
- Independent transmission owners ("ITOs"): Horizon West Transmission, Trans Bay Cable.

Overview of requirements by electrical corporation:

| Requirement | Electrical corporations which shall complete this requirement | Commentary |
|---|---|---|
| Workforce Survey | Large IOUs, SMJUs | For its SCA in 2021, the WSD will seek a standardized baseline for key workforce perceptions and behaviors |
| Self-assessment and plan summary | Large IOUs | A detailed assessment of organizational systems is likely most appropriate for larger, more complex electrical corporations in 2021 |
| Supporting documentation section 1: Objectives | Large IOUs, SMJUs, ITOs | As ITOs are much smaller organizations with a lower risk profile, the WSD will focus on understanding objectives and lessons learned to determine whether additional requirements |
| Supporting documentation section 2: Lessons learned | Large IOUs, SMJUs, ITOs | are appropriate |





| Requirement | Electrical corporations which shall complete this requirement | Commentary |
|--|---|--|
| Supporting documentation section 3: Summary plan | Large IOUs | This is most appropriate for electrical corporations completing the self-assessment and plan summary |
| Supporting documentation section 4: Documentation to support responses to organizational selfassessment | Large IOUs | This is most appropriate for electrical corporations completing the self-assessment and plan summary |
| Interviews | To be determined by the WSD upon review of submissions | The WSD will determine where these are most appropriate following its initial review of submissions |
| Observational visits | To be determined by the WSD upon review of submissions | Not likely to be conducted in 2021 |





1.2 Workforce Survey

1.2.1 How electrical corporations will complete the workforce survey

1.2.1.1 Target population for the workforce survey

Target population

The targeted population for the workforce survey is those employees, supervisors, managers and contractors who are engaged in wildfire hazard mitigation activities. For example, any employee or contractor who conducts work related to the electrical corporation's most recent wildfire mitigation plan as defined by any initiative listed within that plan would qualify. One example of this type of employee is a lineperson who is working to install system hardening infrastructure. How to identify the targeted population will be determined in the survey planning meeting between the WSD and each electrical corporation to be surveyed to be held in early 2021.

The WSD plans to identify those employees and contractors through a planning process, such that only the target population will be surveyed.

• In the planning process, the WSD (or likely, a third-party vendor) will meet with each electrical corporation to be surveyed to identify specific departments and work segments to be surveyed.

Planning meeting

A planning meeting will be conducted with each electrical corporation to be surveyed to define deadlines, finalize demographic questions,² align on method for identifying the targeted survey population,³ and ensure there is agreement between each electrical corporation, WSD, and the third-party survey administrator on next steps and responsibilities. The demographic questions will be used to show results by the various organizational units within the electrical corporation as well as to draw links between the survey results and the Wildfire Mitigation Plan (WMP). Below are common demographic questions; however, the terminology used in the question and the choice options may vary by electrical corporation so that respondents are best able to recognize where they fit among the options. Sample demographic questions:

- In which organizational function do you primarily work?
 - Potential choice options: Field Services, Transmission, Distribution, Environment, Health & Safety, Subcontractor, etc.
- What is your primary work location?
 - Choice options: Listed company locations
- What is your position within the company?

² Demographic Questions. These are the set of questions at the beginning of the 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 they belong to in the organization with options ranging from Executive to Management to Supervisor to Individual Contributor.

³ Targeted Survey Population. For the purpose of the WSD Safety Culture Assessment, the targeted survey population are those employees, supervisors, and managers and contractors who are engaged in wildfire hazard mitigation activities.





- Potential choice options: Executive, Manager, Supervisor, Non-Managerial Individual Contributor⁴
- Mark the wildfire mitigation activities in which you spend at least 10% of your time (check all that apply):
 - Choice Options: Risk Assessment & Mapping, Situational Awareness and Forecasting, Grid Design and System Hardening, Vegetation Management, etc.

<u>Planning Meeting Participants</u>. Participants should be representatives from the electrical corporation, WSD, and the third-party survey administrator.

1.2.1.2 Guidelines for Survey Communication, Administration, and Collection

Overview

A critical element of any workforce survey is to administer it in a fair and unbiased manner so that the data received is a true representation of the employee's perceptions of the work environment and that these perceptions are not unduly influenced by the organization. Therefore, survey communication, administration, and data collection will need to comply with the following guidelines to ensure the data received is accurate.

Survey Communication

To achieve an effective response rate, it is critical that the electrical corporation communicates the purpose for the survey and the value to the participant and the organization. Below are several important elements that should be incorporated into each communication to the targeted survey population:

- All communications from the electrical corporation to the targeted survey population should encourage workforce participation and honesty on the survey.
- The communication may state that the purpose of the survey is to conduct a CPUC safety culture assessment.
- The communication should indicate that responses will be valuable for the electrical corporation to create an action plan for improvement.
- No communications about the survey should refer to implications for the electrical corporation Safety
 Certification or state that the responses on the survey can impact whether the electrical corporation
 receives a Safety Certification. This might create undue pressure or incentive for a respondent to
 respond in a certain way on the survey.
- To increase the survey response rate, the electrical corporation should indicate that it is interested in the employee's perceptions on these issues and is invested in improvement. Conversely, indicating to the employee that the electrical corporation is compelled by the regulator to conduct this survey would dampen the response rate.
- Communications shall state the responses will have no bearing on a worker's performance review, salary or other benefits.

To ensure compliance, the WSD may ask the electrical corporation for all communications about the survey.

⁴ Non-Managerial Individual Contributor. Employees that do not have any other employees directly reporting to them.





Survey Administration

It is imperative to ensure the privacy of responses, such that neither the utility management nor WSD can personally identify respondents. The survey will most likely be administered by a third party. For most of the office, management or professional employees, they will be emailed a link to go online and complete the survey. There typically is no issue with undue influence on these participants as both the administration and response are private and anonymous, provided the communications follow the guidelines listed above.

Special considerations need to be taken to ensure that frontline workers⁵ who don't have a private workspace are not unduly pressured or influenced in their survey responses. This applies to frontline workers whose workspace does not include a personal computer/laptop or workers who are not provided with a company smartphone.

The following guidelines are provided for administering the survey to Frontline Workers:

- If employees are completing the survey on a "common" workstation (that is, a workstation used by multiple people), instructions need to be provided for going to the link, responding, and then submitting the survey without the need for a supervisor to reset the computer and/or submit the response.
- No other leaders or co-workers should be next to, looking over the shoulder, or in the vicinity of the worker as he/she completes the survey.
- If a paper survey is used, no leaders should be in the room while employees are completing the survey.
- All workers in the targeted population should have the opportunity to complete the survey.

Data Collection

Online data collection is typically not an issue for private computers; the survey is housed and responses stored on the servers of an independent third-party administrator.

- For common workstations, it is critical that the worker be the person who clicks on the "submit" button to register the survey.
- The third-party administrator will set up the survey such that once the "submit" button is clicked, there is no way to go back in the system to either view or change the survey responses.
- Paper surveys will not be reviewed or handled by any supervisors or managers in the organization.
- Paper surveys should be put in pre-addressed and stamped envelopes and sent directly to the thirdparty administrator for processing.

1.2.1.3 Proposed workforce survey questions

The Workforce Survey is designed to measure critical aspects of safety culture including the extent to which these aspects extend beyond personal safety to wildfire hazard mitigation. In this Workforce Survey, WSD seeks to examine if this safety culture extends to leaders specifically asking employees for suggestions about wildfire hazards. There are two broad categories of the survey: Leadership Influence and Workforce Behavior.

⁵ Frontline workers. Employees within operational units of the organization.







- <u>Leadership Influence</u> measures the extent to which leaders are proactively impacting the safety culture and is broken into three dimensions: Advocating for the Workforce, Prioritizing Safety, and Leading by Example.
- Workforce Behavior measures the activities employees in the workforce regularly engage in such as
 noticing and reporting issues, following procedures, and intervening with others on safety. This
 category is broken into three dimensions: Raising Concerns, Performing Reliably, and Taking
 Responsibility.

Items are evaluated on a five-point scale ranging from Strongly Disagree to Strongly Agree. Respondents will be encouraged to mark each item⁶ based on their observations of the organization, its leaders, and their fellow workers. If a respondent is unable to answer a question based on their observations, they will be instructed to leave that item blank.

For the purposes of the survey, certain terms are used as follows:

- "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 them such as other work colleagues, contractors, or workers in peer groups.
- "People in my workgroup" and "My workgroup" refers specifically to the respondent's work team.

Leadership Influence

| | 1. Leaders encourage people to ask questions. | | | | | | | |
|------------------------|---|--|--|--|--|--|--|--|
| | 2. My supervisor would use whatever power he/she has to help me out. | | | | | | | |
| Advocating for | 3. The company cares about my opinions. | | | | | | | |
| Workforce | 4. Pausing work for hazards and safety concerns is viewed positively. | | | | | | | |
| | 5. I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them. | | | | | | | |
| | 6. Leaders actively seek out signs of potential wildfire hazards. | | | | | | | |
| | 7. Leaders keep people prepared to intervene when an emergency occurs. | | | | | | | |
| | 8. Our management acts quickly to address wildfire hazards. | | | | | | | |
| Prioritizing Safety | 9. Protecting the community from wildfire hazards is clearly a high priority with management. | | | | | | | |
| | 10. I feel comfortable discussing concerns about wildfire hazards with my supervisor. | | | | | | | |
| | 11. Accidents and incidents ⁷ are investigated completely to find out what happened and the corrective actions needed. | | | | | | | |

⁶ For the online version of the survey, questions can be made mandatory; for any paper versions administered, respondents can only be encouraged to answer each question.

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⁷ Incident here refers to an unplanned, undesired event that adversely affects normal operations, not limited to CPUC reportable incidents, and will likely be perceived as such by the workforce (because incident is used as a common personal safety term).





| | 12. Leaders use mistakes and incidents as learning opportunities. |
|------------|--|
| | 13. Managers treat workers with respect. |
| Leading by | 14. I believe managers apply the same rules for all workers. |
| Example | 15. My supervisor makes sure all employee concerns are heard before job decisions are made. |
| | 16. If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor. |

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Workforce Behavior

| 18. People report mistakes they make, even if others do not notice them. 19. People in my work group report all wildfire hazards, no matter how minor. 20. Information about important events and learnings is shared within my work group. 21. Wildfire and personal safety concerns are communicated openly. 22. People listen to one another; it is rare that someone's views go unheard. 23. People focus on one task at a time and avoid distractions. 24. People have the ability to respond and correct problems and errors before they get on of control. |
|---|
| 20. Information about important events and learnings is shared within my work group. 21. Wildfire and personal safety concerns are communicated openly. 22. People listen to one another; it is rare that someone's views go unheard. 23. People focus on one task at a time and avoid distractions. 24. People have the ability to respond and correct problems and errors before they get out of control. |
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| 23. People focus on one task at a time and avoid distractions. 24. People have the ability to respond and correct problems and errors before they get out of control. |
| Performing Reliably 24. People have the ability to respond and correct problems and errors before they get out of control. |
| Performing of control. |
| Reliably |
| 25. People have the skills they need to resolve workplace safety issues. |
| 26. We have the right tools for the job. |
| 27. I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment. |
| Taking 28. I take responsibility for the safety of myself and others in my work area. |
| Responsibility 29. People in my work group treat each other with respect. |
| 30. My workgroup consistently follows the procedures to control workplace hazards in outwork areas (including procedures specific to wildfire hazards). |

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1.2.2 The survey output the WSD will receive

After the survey data is collected and tabulated (most likely by the third-party survey administrator), results will be provided to the WSD and to electrical corporations. Anonymized data will be shared in the following format:

• A document containing detailed and anonymized data in an Excel file (or data file desired by the WSD). This will enable more detailed analysis (if desired) and can serve as a reference point for future trend analysis. Ensuring anonymity is critical for increasing the survey response rate and receiving honest perceptions of the work environment, so as the 2021 survey process gets underway, the WSD will work with the third party-survey administrator to ensure data is as detailed as possible while remaining truly anonymous.





Self-assessment 1.3

1.3.1 How electrical corporations will complete the organizational self-assessment

As outlined in Attachment 4 to Resolution WSD-011, the organizational self-assessment will be applied by the WSD to track each electrical corporation's organizational culture over time. The following self-assessment will be used to establish a baseline for each electrical corporation's organizational culture in 2021, as well as establish a target for improvement by 2022.

Each electrical corporation shall complete the following self-assessment by:

- 1. Indicating the most appropriate response option to each question based on the presently employed practices and capabilities of the electrical corporation, including a description of why they have rated themselves at that level.
- 2. Indicating the electrical corporation's expected response to each question in January 2023 based on wildfire initiatives in the coming year.
- 3. Summarizing its plan to realize that target, as presented in more detail in section 1.4.

The self-assessment scales are presented on the next page.





1.3.2 Behaviorally anchored rating scale

The questions on the Self-Assessment are rated against 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 a requirement

Safety is viewed as externally required burden.

Primary focus is on avoiding cost and negative press.



As a priority

Safety is viewed as important, but priority is routinely susceptible to competing pressures.

Leaders react to injuries or incidents rather than focusing on exposure control.8



As a value

Worker wellbeing and public safety have intrinsic worth with decisions and actions oriented in trust and safety.

Leadership seeks to understand exposures, weak signals and performance consistency.



Who we are

Safety is inherent within the organizational identity creating sensitivity to subtle changes in exposure.

The culture is inclusive, caring and trusting. Safety leadership is broad and learning oriented with governance highly effective and systematic.

⁸ Exposure. A state of vulnerability to injury that exists when a person comes in contact with a hazard. Exposure reduction or exposure control results from separating the person from the hazard and protecting the person from the vulnerability raised by the hazard (for example, by wearing protective equipment).





1.3.3 Self-assessment overview

The organizational self-assessment is intended to assess 9 dimensions across 3 categories in a streamlined, efficient fashion. An overview of the proposed dimensions is provided below:

| 1. | Organizational sustaining systems | 2. | Structure and governance | 3. | Safety enabling systems |
|-----|--|-----|--|-----|--|
| 1.1 | Performance management | 2.1 | Senior leadership accountability | 3.1 | Event ⁹ investigation |
| | How the organization drives individual safety performance 3 questions | | How safety leadership accountability is assigned and reflected through measures and objectives 3 questions | | Types of incidents investigated, quality and results of investigations 3 questions |
| 1.2 | People development | 2.2 | Metrics and targets | 3.2 | Hazard recognition |
| | How employees and contractors are provided with training and continuous learning opportunities 3 questions | | Effectiveness of safety metrics and actions of leadership in response and extent to which metrics are communicated 3 questions | | Extent to which hazards are reported and recognized 1 question |
| 1.3 | Rewards and recognition | | | 3.3 | Anticipation, resilience and learning |
| 1.3 | Extent to which rewards and incentive systems support safety 1 question | | | | How the organization anticipates and learns from incidents and near misses ¹⁰ 3 questions |
| | | | | 3.4 | Assurance |
| | | | | | Safety audit processes used and tracking of findings 2 questions |

⁹ Incident. An unplanned, undesired event that adversely affects normal operations. In this context, not limited to CPUC-reportable incidents.

¹⁰ In other contexts, WSD uses the term "risk events" instead of "near misses" but has left "near misses" here as it is a more commonly understood term.





1.3.4 Index of self-assessment questions

Each self-assessment dimension is assessed through 1-3 multiple choice questions. A list of all questions is provided here. The choices for each question are provided in the next section (1.3.5).

| Dimension | | | Assessm | ent Question |
|-------------------------|-----|---------------------------|---------|--|
| | | Performance management | 1.1.1 | To what extent is wildfire safety performance integrated into leadership selection/promotion decisions? |
| | 1.1 | | 1.1.2 | How are wildfire safety responsibilities integrated into frontline leaders' goals and objectives? |
| 1. | | | 1.1.3 | To what extent is safety and the ability to work safely incorporated into position descriptions and expectations? |
| Org. Sustaining Systems | 1.2 | People development | 1.2.1 | To what extent are training and support resources available to frontline leaders 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 | 1.3.1 | To what extent do rewards and incentives for operational leaders ¹² and workers support safety and mitigating wildfire hazards? |
| | | | 2.1.1 | Who is accountable for wildfire safety outcomes? |
| | 2.1 | Senior leadership | 2.1.2 | Who is accountable for personal safety outcomes? |
| 2. | 2.1 | accountability | 2.1.3 | Rate the types of wildfire safety measures and objectives tracked by senior operational leadership. |
| Governance | 2.2 | Metrics and targets | 2.2.1 | How effective are wildfire safety metrics ¹³ 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? |

¹¹ Frontline leaders. First level of leadership, these supervisors have direct oversight of employees within operational units of the organization.

¹² Operational leaders. Operational Leaders are levels of management within operations ranging from frontline supervisors (who have direct oversight of employees) to executive level senior operational leaders.

¹³ Wildfire safety metrics may include metrics such as inspection findings, ignitions, wire down events, wildfire fatalities, etc.





| | Dimension | | Assessm | ent Question |
|-------------------------|-----------|--|---------|--|
| | | | 3.1.1 | What types of adverse events are investigated using root cause analysis? ¹⁴ |
| | 3.1 | Event investigation | 3.1.2 | Rate the quality of event investigations. |
| | | | 3.1.3 | What happens with investigation results? |
| | 3.2 | Hazard recognition | 3.2.1 | What kind of process is used by frontline workers to recognize and report wildfire hazards? |
| 3. | | Anticipation, resilience, and learning | 3.3.1 | What structures, systems, and/or processes have been established to encourage sensitivity to weak signals ¹⁵ of wildfire hazards? |
| Safety Enabling Systems | 3.3 | | 3.3.2 | What steps are taken to ensure frontline leaders and workforce can respond quickly to upset conditions ¹⁶ ? |
| | | | 3.3.3 | What processes and structures have been established to create a learning organization ¹⁷ ? |
| | 2.4 | 4 Assurance | 3.4.1 | What types of safety audits ¹⁸ are used for activities related to wildfire hazard mitigation? |
| | 3.4 | | 3.4.2 | How are the findings from safety audits used for activities related to wildfire hazard mitigation tracked to closure? |

¹⁴ Root cause analysis. A systematic process for identifying the primary causes of problems or events and an approach for responding to them.

¹⁵ Weak signal. An indicator of a potentially emerging issue, that may become significant in the future.

¹⁶ Upset Conditions. Interruptions in the regular running of work processes or other planned activity.

¹⁷ Learning Organization. An organization skilled at creating, acquiring, and transferring knowledge, and at modifying its behavior to reflect new knowledge and insights.

¹⁸ 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.





1.3.5 Self-assessment scales for each question and references to supporting evidence

This section contains the questions and response options for each self-assessment dimension. To enable the WSD to verify responses if needed, electrical corporations shall describe their reasoning for each self-assessment rating in 2021. The WSD reserves the right to update this request in future years to include more detailed supporting documentation. Requests for supporting documentation in 2021 are at the WSD's discretion. An example of possible supporting documentation the WSD may request is provided in section 1.4.





1.1 Performance Management

Assessment Questions

| Assessment Question | (1) Requirement | (2) Priority | (3) Value | (4) Who we are |
|---|--|---|--|---|
| 1.1.1 To what extent is wildfire safety performance integrated into leadership selection/ promotion decisions? | O Not Considered | Personal and wildfire safety performance are considered in selection/promotion decisions but are not the primary factors | Personal and wildfire safety performance are heavily weighted, primary factors in hiring / promotion decisions; | Excellent personal and wildfire safety performance are necessary for advancement; poor safety performance eliminates leader from selection/promotion |
| 1.1.2 How are wildfire safety responsibilities integrated into frontline leaders' goals and objectives? | No annual goals or objectives related to wildfire safety | Goals and objectives focus on only lagging measures ²⁰ for wildfire or personal safety related to wildfire mitigation work | Goals and objectives contain a mix of leading ²¹ 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? | · | Focus is on compliance with rules and dismissal if found out of compliance | Emphasis on more than just compliance with rules, but also includes role 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 |

¹⁹ Frontline leaders. First level of leadership, these supervisors have direct oversight of employees within operational units of the organization. ²⁰ Lagging measures/indicators. Outcome or output measures that are backward looking indicators of events that have already occurred.

²¹ Leading measures/indicators. Input measures that are predictive of future events or occurrences.





1.2 People Development

Assessment Questions

| Assessment Question | (1) Requirement | (2) Priority | (3) Value | (4) Who we are |
|---|-----------------------------|--|---|---|
| 1.2.1 To what extent are training and support resources available to frontline leaders ²² to improve their safety leadership skills? | | Job-specific wildfire safety training focused on rules compliance, procedures, and safety systems (e.g. familiarity with wildfire-related job procedures or personal safety related procedures.) | Job-specific wildfire safety training; in addition, wildfire safety training beyond job requirements (e.g., wildfire mitigation strategy and initiatives), and leadership training (giving feedback, accountability, etc.) | All criteria in "value" option are met; In addition, training includes advanced safety topics such as exposure ²¹ management ²⁴ , and human performance reliability ²⁵ |
| 1.2.2 To what extent are training and support resources available to frontline workers ²⁶ to improve their wildfire safety skills? | No training available | Job specific wildfire safety training focused on rules compliance, procedures, and safety systems (e.g. familiarity with wildfire-related job procedures or personal safety related procedures.) | Job-specific wildfire safety training; in addition, wildfire safety training beyond job requirements (e.g., wildfire mitigation strategy) and behavior-based safety training (observing safe behaviors, approaching others, etc.) | All criteria in "value" option are met; In addition, training includes advanced safety topics such as human performance reliability |
| 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 |

²² Frontline leaders. First level of leadership, these supervisors have direct oversight of employees within operational units of the organization.

²³ Exposure. A state of vulnerability to injury that exists when a person comes in contact with a hazard. Exposure reduction or exposure control results from separating the person from the hazard and protecting the person from the vulnerability raised by the hazard (for example, by wearing protective equipment).

²⁴ Exposure Management Training. Exposure management training 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.





1.3 Rewards and recognition

Assessment Questions

| Assessment Question | (1) Requirement | (2) Priority | (3) Value | (4) Who we are |
|--|---|--|---|--|
| 1.3.1 To what extent do rewards and incentives for operational leaders ²⁷ 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 hazard mitigation activities | Rewards and incentives focus on leading activities such as reporting wildfire concerns, bringing innovative ideas to reduce wildfire hazards, and approaching others on safety |

²⁵ Human Performance Reliability. The suite of knowledge, skills and capabilities required to anticipate, control, and respond to unplanned issues and error.

²⁶ Frontline workers. Employees within operational units of the organization.

²⁷ Operational leaders. Operational Leaders are levels of management within operations ranging from frontline supervisors (who have direct oversight of employees) to executive level senior operational leaders.





2.1 Senior leadership accountability

Assessment Questions

| Assess | ment Question | | (1) Requirement | | (2) Priority | | (3) Value | | (4) Who we are |
|--------|---|---|-------------------------------|---|--|---|--|---|--|
| 2.1.1 | Who is accountable for wildfire safety outcomes? | 0 | Not defined | 0 | Safety department | 0 | Operational leadership ²⁸ and Safety Department | 0 | Executive leadership ²⁹ with Safety Department as trusted advisor |
| 2.1.2 | Who is accountable for <u>personal</u> safety outcomes? | 0 | Not defined | 0 | Safety department | 0 | Operational leadership and Safety Department | 0 | Executive leadership with Safety Department as trusted advisor |
| 2.1.3 | Rate the types of wildfire safety measures and objectives tracked by senior operational leadership. | 0 | No wildfire safety objectives | 0 | Leading and lagging wildfire safety measures required to be reported for regulatory purposes | 0 | Required safety measures for regulatory purposes. Additional leading measures used for wildfire mitigation work that are aligned to actionable initiatives | 0 | Required safety measures. Additional leading measures used for wildfire mitigation work that are aligned to actionable initiatives at each level of the organization |

²⁸ Operational Leaders are levels of management within operations ranging from frontline supervisors (who have direct oversight of employees) to executive level senior operational leaders (e.g., COO).

²⁹ Executive leadership is generally the highest level of management in an organization and reports to the CEO.





2.2 Metrics and Targets

Assessment Questions

| Assessment Question | (1) Requirement | (2) Priority | (3) Value | (4) Who we are |
|---|-------------------------------------|---|---|--|
| 2.2.1 How effective are wildfire safety metrics ³⁰ in providing insight into critical areas of risk? | Not effective | Reasonably effective in providing data and trends across company | providing data and | Highly effective in providing data and critical exposure area trends, and actionable insight |
| 2.2.2 How frequently does the senior safety team monitor and adjust actions and strategies related to wildfire safety? | Never | Periodically (1-2 time/ year as wildfire season approaches) | Often (e.g., 3-5 times per year) monitors action plans and responds to emerging issues, and developments | Regularly (e.g., scheduled monthly) monitors action plans and strategies. Conducts real time strategic problem solving focused on systemic risks ³² |
| 2.2.3 To what extent are wildfire safety metrics communicated throughout the organization? | Safety metrics are not shared | Lagging metrics for wildfire outcomes are posted at local/site operations ³³ | Lagging and leading measures for wildfire safety are posted and discussed in regular management and supervisor meetings | Lagging and leading measures for wildfire safety are discussed; individual/ team contributions to leading measures are highlighted and recognized publicly |

³⁰ Wildfire safety metrics may include metrics such as inspection findings, ignitions, wire down events, wildfire fatalities, etc.

³¹ Exposure. A state of vulnerability to injury that exists when a person comes in contact with a hazard. Exposure reduction or exposure control results from separating the person from the hazard and protecting the person from the vulnerability raised by the hazard (for example, by wearing protective equipment).

³² Systemic risks. Vulnerabilities that could result in cascading or broad failures across the utility.

³³ Operations. Refers to the parts of a business that affect the production, distribution, and service necessary for a company to function. For WSD purposes, electrical operations, field services, transmission, substations, and distribution are considered in operations, but generation is not.





3.1 Event Investigation

Assessment Questions

| Assess | ment Question | | (1) Requirement | | (2) Priority | | (3) Value | | (4) Who we are |
|--------|--|---|---|---|---|---|---|---|--|
| 3.1.1 | What types of adverse events are investigated using root cause analysis? ³⁴ | 0 | Only fatal or serious incidents ³⁵ required to be reported ³⁶ to OSHA or fire incidents ³⁷ required to be reported to CPUC | 0 | All incidents required to be reported; in addition, work- related injuries involving days away from work and fire incidents that do not meet CPUC reporting standards | 0 | All incidents with the potential to be serious or fatal, including near misses | 0 | All high potential events and near misses. Also, event learning ³⁸ teams evaluate high risk situations ³⁹ for proactive opportunities to reduce exposure ⁴⁰ |
| 3.1.2 | Rate the quality of event investigations. | 0 | A "fix the employee" mentality is commonplace when addressing incidents or other adverse events | 0 | Investigations primarily focus on identifying exposure and the root cause of the exposure | 0 | Investigations focus on identifying the root cause of the exposure and describing actions to control the exposure | 0 | Incidents are regarded as learning events that spur a comprehensive look at culture, processes, and safety systems that led to the event |

³⁴ Root cause analysis. A systematic process for identifying the primary causes of problems or events and an approach for responding to them.

 $^{^{\}rm 35}$ Incident. An unplanned, undesired event that adversely affects normal operations.

³⁶ OSHA Reportable Incidents. Fatal and extremely serious injuries or illnesses required to be reported to OSHA within defined time periods such as amputation, eye loss, in-patient hospitalization, or fatality.

³⁷ Fire Incidents. Fire events that are required to be reported to the CPUC that meet the following criteria: (a) a self-propagating fire of material other than electrical and/or communication facilities, (b) the resulting fire traveled greater than one meter from the ignition point, and (c) the electrical corporation has knowledge that the fire occurred.

³⁸ 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.





| Assessment Question | (1) Requirement | (2) Priority | (3) Value | (4) Who we are | |
|--|--|--|--|---|--|
| 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 ⁴¹ ; learnings are shared throughout organization | Systemic approach to tracking/closing actions using high value controls; learnings leveraged broadly across organization to affect change and control exposure (e.g. leading to procedural or policy changes throughout organization, where applicable) | |

³⁹ High Risk Situations. Work activities or situations that have previously been shown in incident data to be consistent with serious or fatal incidents.

⁴⁰ Exposure. A state of vulnerability to injury that exists when a person comes in contact with a hazard. Exposure reduction or exposure control results from separating the person from the hazard and protecting the person from the vulnerability raised by the hazard (for example, by wearing protective equipment).

⁴¹ 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 (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.





3.2 Hazard Recognition

Assessment Questions

| Assessment Question | (1) Requirement | (2) Priority | (3) Value | (4) Who we are |
|---|-------------------|--|--|---|
| 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, trained and communicated widely; consistent follow-up to reduce exposure ⁴² | Process established and communicated for wildfire hazard reporting; workforce trained and encouraged to report wildfire hazards; results broadly shared across organization to spur learning and exposure reduction |

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Supporting evidence available as part of supporting documentation requirement

3.2.1 Describe process used for wildfire hazard recognition and the system used for tracking and communication. Describe actions taken as a result of hazards surfaced over the past 6 months.

⁴² Exposure. A state of vulnerability to injury that exists when a person comes in contact with a hazard. Exposure reduction or exposure control results from separating the person from the hazard and protecting the person from the vulnerability raised by the hazard (for example, by wearing protective equipment).





3.3 Anticipation, resilience and learning

Assessment Questions

| Assessment Question | (1) Requirement | | (2) Priority | | (3) Value | | (4) Who we are |
|--|--|---|--|---|---|---|---|
| 3.3.1 What structures, systems, and/or processes have been established to encourage sensitivity to weak signals ⁴³ of wildfire hazards? | No formal process or structure | 0 | Workforce is encouraged to report wildfire hazards as they see them. | 0 | System established for reporting and mitigating wildfire hazards; leaders encourage reporting of weak signals | 0 | A cross-functional team is established to proactively look for, track, and mitigate wildfire hazards and potential black swan ⁴⁴ situations |
| 3.3.2 What steps are taken to ensure frontline leaders and workforce can respond quickly to upset conditions ⁴⁵ ? | No formal training or preparation | 0 | Common upset conditions have been identified and response protocols are reviewed regularly | 0 | Simulations and drills ⁴⁶ are conducted regularly to prepare the workforce | 0 | Simulations and drills are conducted regularly to practice responses to upset conditions and leaders have instilled a "what could go wrong?" mentality |
| 3.3.3 What processes and structures have been established to create a learning organization ⁴⁷ ? | Few processes, training or structures have been established for sharing safety-related learnings across the organization | 0 | Have implemented a knowledge management system for sharing safety-related best practices and incidents throughout the organization | 0 | All criteria met in "priority" option, plus processes exist for systematically using the knowledge management system and implementing safety-related best practices | 0 | All criteria met in "value" option, plus these processes for tapping best practices in knowledge management system are used routinely and by nearly everyone |





3.4 Assurance

Assessment Questions

| Assessment C | Question | | (1) Requirement | | (2) Priority | | (3) Value | | (4) Who we are |
|---|---|---|---------------------------------|---|--|---|--|---|--|
| safety used relate | types of y audits ⁴⁸ are for activities ed to wildfire d mitigation? | | No formal self-audits conducted | 0 | Site specific self- audits required; internal audits occur only after an incident has occurred | 0 | Site specific self- audits required; internal audits occur based on level of wildfire risk present | 0 | Systemic and rigorous self, independent, and internal audits conducted; used for alignment, calibration and learning |
| findin safety for ac relate hazar | are the ngs from y audits used ctivities ed to wildfire d mitigation ed to closure? |) | No formal tracking mechanism | 0 | Self-tracking of closures; no verification | 0 | Audit findings tracked and verified to closure | 0 | Audits tracked, implementations verified to closure, and effectiveness validated. |

 $^{^{43}}$ Weak Signal. An indicator of a potentially emerging issue, that may become significant in the future.

⁴⁴ Black Swan. Unpredictable events that are beyond what is normally expected and have potentially severe consequences.

⁴⁵ Upset Conditions. Interruptions in the regular running of work processes or other planned activity.

⁴⁶ Drills. A coordinated, supervised activity designed to test work team responses to various planned upset conditions.

⁴⁷ Learning Organization. An organization skilled at creating, acquiring, and transferring knowledge, and at modifying its behavior to reflect new knowledge and insights.

⁴⁸ 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.

1.4 Supporting documentation

1.4.1 How electrical corporations will complete the supporting documentation requirement

If requested by the WSD, electrical corporations shall complete the supporting documentation requirement as outlined below. Requests for supporting documentation in 2021 are at the WSD's discretion.

1.4.2 Supporting documentation requirement

The supporting documentation requirement has four sections.

- 1. Safety culture objectives
- 2. Summary of lessons learned
- 3. Summary plan for following year
- 4. Documentation to support responses to organizational self-assessment

Instructions for filling out the supporting documentation requirement are given within each section outlined above. Sections of this document contain a portion for the electrical corporation to provide a narrative response. This narrative response may include quantitative and qualitative explanations, as well as supporting documentation including relevant spreadsheets, charts, data, and other relevant information.





1. Safety Culture Objectives

Provide a description of the electrical corporation's objectives with respect to safety culture,

- i. Over the next 12 months
- ii. Over the next 3 years

Each electrical corporation should provide this information in tables 1 and 2 below, adding rows below as needed.

Table 1.1: 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 |
|--------------|--|---|---|
| | | | |
| | | | |
| | | | |

Table 1.2: Objectives for the next 3 years

| C. Objective | D. 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 |
|--------------|--|---------------------------------------|---|
| | | | |
| | | | |
| | | | |



2. Description of lessons learned since 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.

3. Summary plan

For 2021, each electrical corporation shall submit a summary action plan for the work that is planned from 2021 to achieve their 2022 targets indicated in their organizational self-assessment.

In subsequent years, the WSD reserves the right to require that this plan should indicate detailed action steps, owners, deadlines, and how the action will be monitored and tracked.

4. Documentation to support responses to organizational self-assessment

In 2021, the WSD will only require electrical corporations to describe in the self-assessment their justification for their 2021 self-rating. Additional requests for supporting documentation in 2021 are at the WSD's discretion.

In 2022 and beyond, the WSD reserves the right to request the supporting documentation below so that the WSD may evaluate and validate the self-assessment rating provided.





Potential Supporting documentation table:

| | Supporting Evidence that could be requested by the WSD | Applicable Questions |
|----|--|-------------------------|
| 1 | Provide 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 should be operational leaders ⁴⁹ and a mix of levels from frontline supervisors ⁵⁰ to senior operational leaders. | 1.1.1 |
| 2 | Provide a sample of performance goals and objectives used in personal annual performance reviews from 2-3 frontline leaders. | 1.1.2 |
| 3 | Provide position descriptions for one frontline worker, supervisor, and senior operational leader | 1.1.3 |
| 4 | List of safety training required by frontline leaders (do not include training required for specialty certifications or licenses such as CPR certification) | 1.2.1 |
| 5 | List of safety training required by frontline workers (do not include training required for specialty certifications or licenses such as a Lineman's International Brotherhood of Electrical Worker certification). | 1.2.2 |
| 6 | 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 |
| 7 | Provide 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 | Provide examples of the wildfire metrics and reports reviewed by senior operational leadership beyond those required by the WMP process. | 2.1.3, 2.2.1 |
| 9 | 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 hazard mitigation actions). | 2.2.2 |
| 10 | Provide examples of the wildfire metrics are shared with frontline supervisors and workers. Describe how these are communicated. | 2.2.3 |

⁴⁹ Operational Leaders are levels of management within operations ranging from frontline supervisors (who have direct oversight of employees) to executive level senior operational leaders (e.g., COO).

⁵⁰ Frontline supervisors. First level of leadership, these supervisors have direct oversight of employees within operational units of the organization.



| | Supporting Evidence that could be requested by the WSD | Applicable Questions |
|----|--|-------------------------|
| 11 | 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 |
| 12 | Describe process used for wildfire hazard recognition and the system used for tracking and communication. Describe actions taken as a result of hazards surfaced over the past 6 months. | 3.2.1 |
| 13 | Provide a spreadsheet of the last 50 wildfire hazard incidents (or potential incidents) recorded in incident database including all demographic information (location, date, departments involved), type of incident (near miss ⁵¹ , recordable, equipment damage, etc.) and actions taken. | 3.3.1 |
| 14 | Provide 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 |
| 15 | Provide a description of the audit process used for activities related to wildfire hazard mitigation; detailing how they are conducted, frequency, and how items are tracked to closure. | 3.4.1 |
| 16 | Provide the most recent audit conducted of a site or department on activities related to wildfire hazard mitigation. Include the site or department's action plan based on the audit. | 3.4.2 |

⁵¹ In other contexts, WSD uses the term "risk events" instead of "near misses" but has left "near misses" here as it is a more commonly understood term.





1.5 Interviews

Each electrical corporation shall, at the WSD's request, make itself available for interviews and observations.

The objective of these interviews will be to allow the WSD to better understand the results of the workforce survey and self-assessment (where applicable). Understanding the organizational context behind responses will help the WSD interpret the results of the survey and self-assessment more accurately and better identify priority areas which electrical corporations should focus on improving.





2

Glossary of defined terms

2 Glossary of defined terms

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2 Glossary of defined terms

| Term | Definition |
|------------------------------------|--|
| Black Swan | Unpredictable events that are beyond what is normally expected and have potentially severe consequences. |
| Demographic Questions | These are the set of questions at that beginning of the 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 they belong to in the organization with options ranging from Executive to Management to Supervisor to Individual Contributor. |
| Drills | A coordinated, supervised activity 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. |
| Exposure | A state of vulnerability to injury that exists when a person comes in contact with a hazard. Exposure reduction or exposure control results from separating the person from the hazard and protecting the person from the vulnerability raised by the hazard (for example, by wearing protective equipment). |
| Exposure Management Training | Exposure management training 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. |
| Fire Incidents | Fire events that are required to be reported to the CPUC that meet the following criteria: (a) a self-propagating fire of material other than electrical and/or communication facilities, (b) the resulting fire traveled greater than one linear meter from the ignition point, and (c) the electrical corporations has knowledge that the fire occurred. |
| Frontline leaders | First level of leadership, these supervisors have direct oversight of employees within operational units of the organization. |
| Frontline workers | Employees within operational units of the organization. |
| High Risk Situations | Work activities or situations that have previously been shown in incident data to be consistent with serious or fatal incidents. |





| Term | Definition |
|---|---|
| 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 (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. |
| Lagging indicator | Outcome or output measures that are backward looking indicators of events that have already occurred. |
| Leading indicator | Input measures that are predictive of future events or occurrences. |
| Non-managerial Individual Contributor | Employees that do not have any other employees directly reporting to them. |
| Learning Organization | An organization skilled at creating, acquiring, and transferring knowledge, and at modifying its behavior to reflect new knowledge and insights. |
| OSHA Reportable Incidents | Fatal and extremely serious injuries or illnesses required to be reported to OSHA within defined time periods such as amputation, eye loss, in-patient hospitalization, or fatality. |
| Operations | Refers to the parts of a business that affect the production, distribution, and service necessary for a company to function. For WSD purposes, electrical operations, field services, transmissions, substations, and distribution are considered in operations, but generation is not. |
| Operational Leaders | Operational Leaders are levels of management within operations ranging from frontline supervisors (who have direct oversight of employees) to executive level senior operational leaders. |
| Root cause analysis | A systematic process for identifying the primary 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. |
| Systemic risks | Vulnerabilities that could result in cascading or broad failures across the utility. |





| Term | Definition |
|-------------------------------|--|
| Targeted Survey Population | For the purposed of the WSD Safety Culture Assessment, the targeted survey population are those employees, supervisors, and managers and contractors who are engaged in wildfire hazard mitigation activities. |
| 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. |