

CPUC Safety Culture Assessments

SPD/Energy Safety Alignment Workshop, May 19, 2025

Safety Culture and Governance
Safety Policy Division



California Public
Utilities Commission

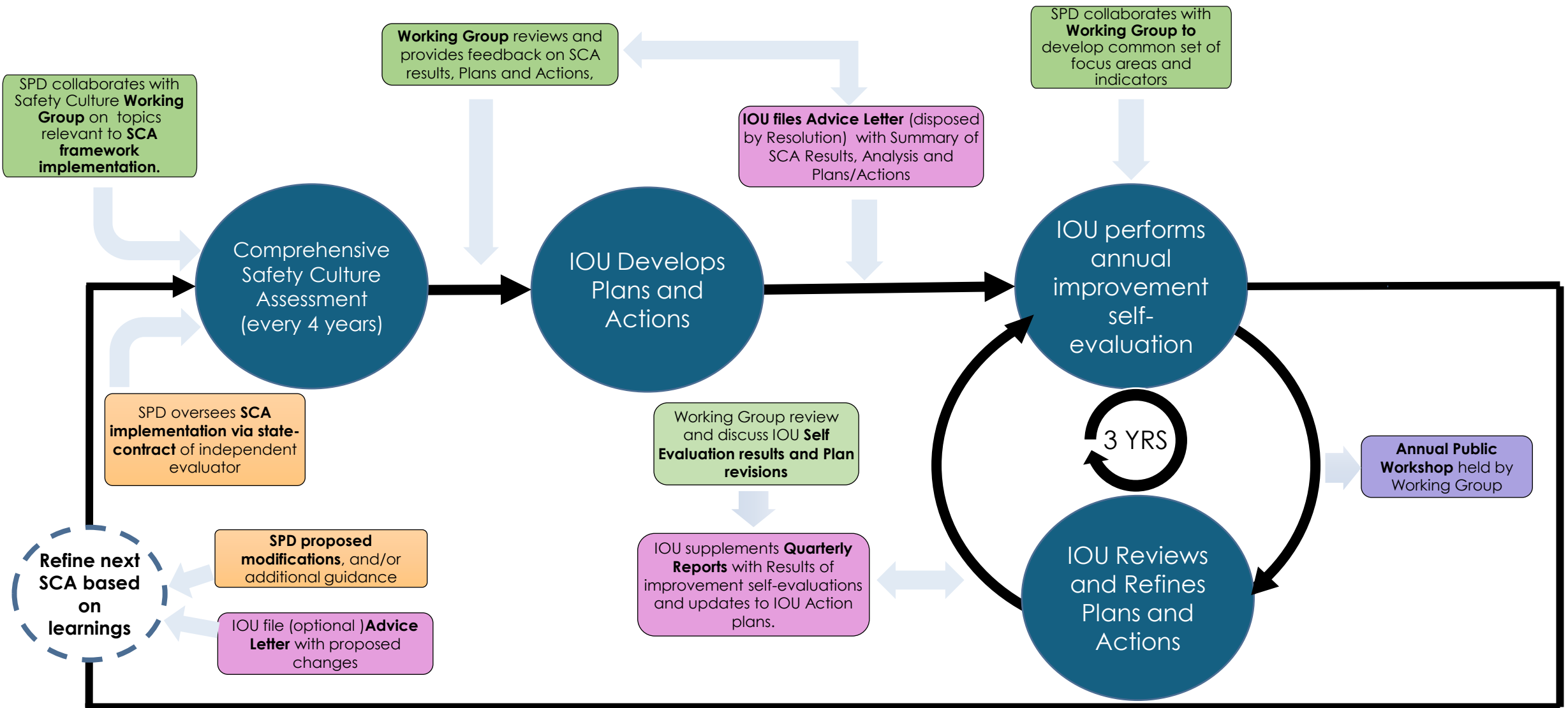
CPUC Safety Culture Assessment Framework adopted by D.25-01-031

- **Goals and Principles**
- **Definitions**
 - **Safety culture:** a subset of organizational culture. Safety culture is the collective set of values, principles, beliefs, norms, attitudes, behaviors, and practices that an organization's managers, employees, and contractor personnel (collectively, "workers") share *with respect to risk and safety*.
 - **Safety:** is synonymous with the prevention of harm to people, the environment, and assets. Safety encompasses safety of workers, and members of the public; operational/process safety; facility or asset integrity; security; and environmental protection.
- **Normative Framework-** model based on the USNTC 10 traits (normative framework).
- **Quadrennial Comprehensive Assessment:** systematic multi-method approach, qualitative and quantitative techniques, triangulate data across different methods, provides a deep and rich picture of culture -- including the underlying values, beliefs, and norms -, results in findings about the strengths and weaknesses relative to the normative framework, conclusions, and actionable recommendations to identify suitable interventions; strive to reduce and mitigate potential biases.
- **Annual Improvement Self-Evaluation**
- **Safety Culture Working Group**

Summary Goals and Principles to Guide CPUC Framework and Collaborative Engagement.

Goals	Principles
<ul style="list-style-type: none"> • Make safety a core organizational value, not just compliance. 	<ul style="list-style-type: none"> • Foster a shared understanding of safety culture across all stakeholders.
<ul style="list-style-type: none"> • Enable cross-entity collaboration to identify and manage risk. 	<ul style="list-style-type: none"> • Engage all parties, as necessary —IOU workforce, contractors, governments, communities, and industry groups.
<ul style="list-style-type: none"> • Embed operational safety into safety culture to prevent catastrophic events. 	<ul style="list-style-type: none"> • Ensure privacy and confidentiality of individual workers.
<ul style="list-style-type: none"> • Use a systemic approach 	<ul style="list-style-type: none"> • Open communication and reporting without worker fear of retaliation.
<ul style="list-style-type: none"> • Develop tools to monitor and improve safety culture proactively. 	<ul style="list-style-type: none"> • Emphasize learning and continuous improvement.
	<ul style="list-style-type: none"> • The Commission plays a supportive role, influencing safety culture
	<ul style="list-style-type: none"> • Non-punitive collaboration to strengthen safety culture.
	<ul style="list-style-type: none"> • IOUs have full ownership and responsibility for their organization's safety culture.

CPUC's IOU Safety Culture Assessment and Monitoring Process



Features of CPUC Safety Culture Assessments

- Covers all risks presented by the IOU (not just wildfire safety).
- Applies to both large electric and gas investor-owned utilities.
- Multi-method comprehensive assessment - deep and rich picture of safety culture, including underlying values, beliefs, and norms.
- Frequency (every 4 yrs) permits a deeper dive into the culture.
- Utilizes a normative framework against which to evaluate.
- Performed by a third-party evaluator.

SPD's Envisioned Safety Culture Assessment Methodology

The statements in this document are those of the authors and do not necessarily represent the views of the CPUC

General Approach

- Focus on **identifying underlying basic assumptions** (i.e. what's “below the surface” or can't be seen) based on the safety culture assessment framework adopted by the CPUC.
- Comprehensive assessment: multi-method approach that involves going beyond **employee perceptions, performed in a systematic manner**; NOT perception based or led.
- Extraction of cultural themes and triangulation of related signals across the multiple data collection sources.
- Rooted in the International Atomic Energy Agency (IAEA) assessment approach and methodology (see [STI/PUB/1682](#) and [SVS-32 web.pdf](#)).

Unique features of the IAEA Methodology

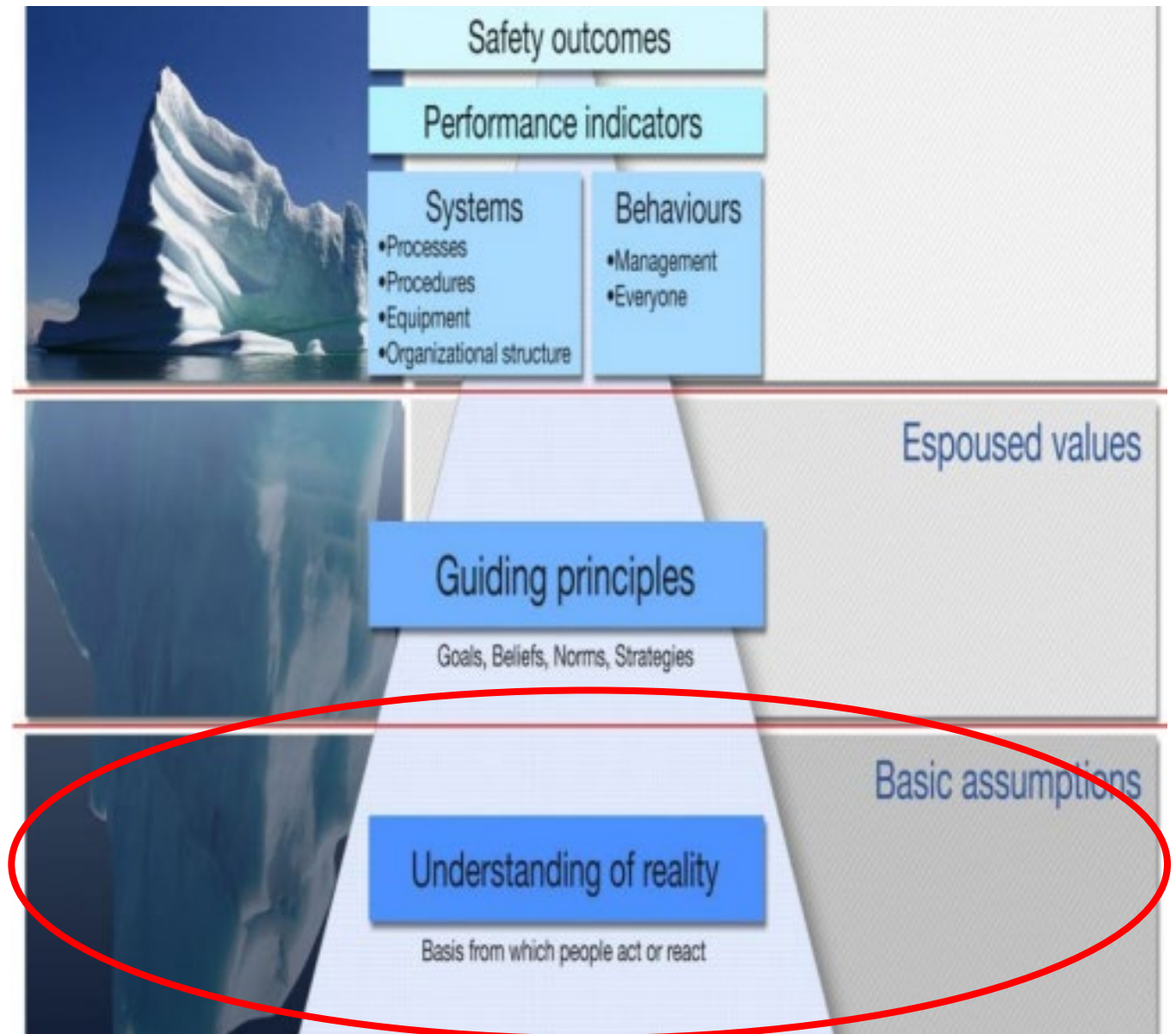
Approach: Qualitative and quantitative methods (qualitative are predominant), emphasizes continuous improvement and organizational learning, promotes system thinking, focus on understanding “Basic Assumptions”.

Tools: Multimethod to triangulate data across methods .

Culture View: Dynamic and evolving

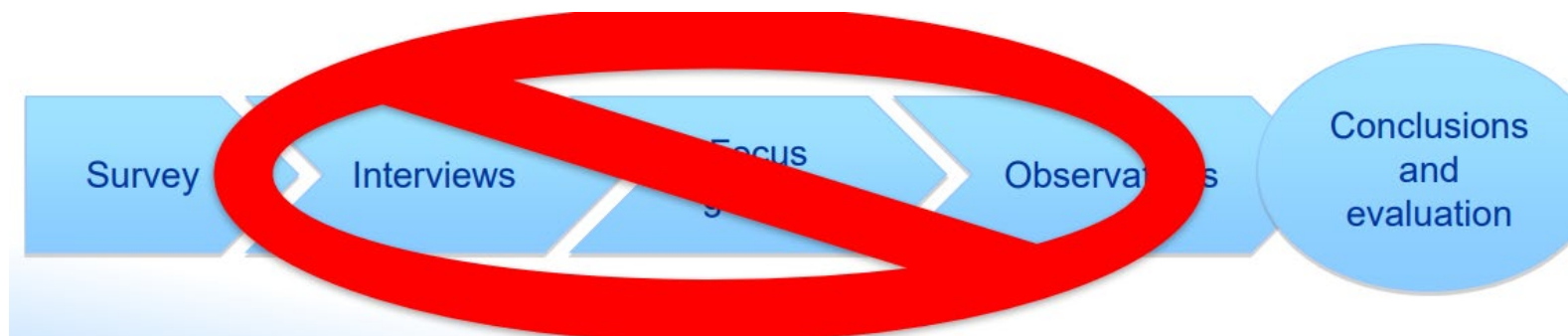
Assessment focus: context-sensitive understanding

End Goal: Insight for improvement



IAEA Data Collection

- Multi-method data gathering:
 - survey, document review, interviews, focus groups, observations;
 - both qualitative and quantitative methods, but qualitative methods are predominant.
- Concurrent assessment process, i.e each assessment method treated separately.



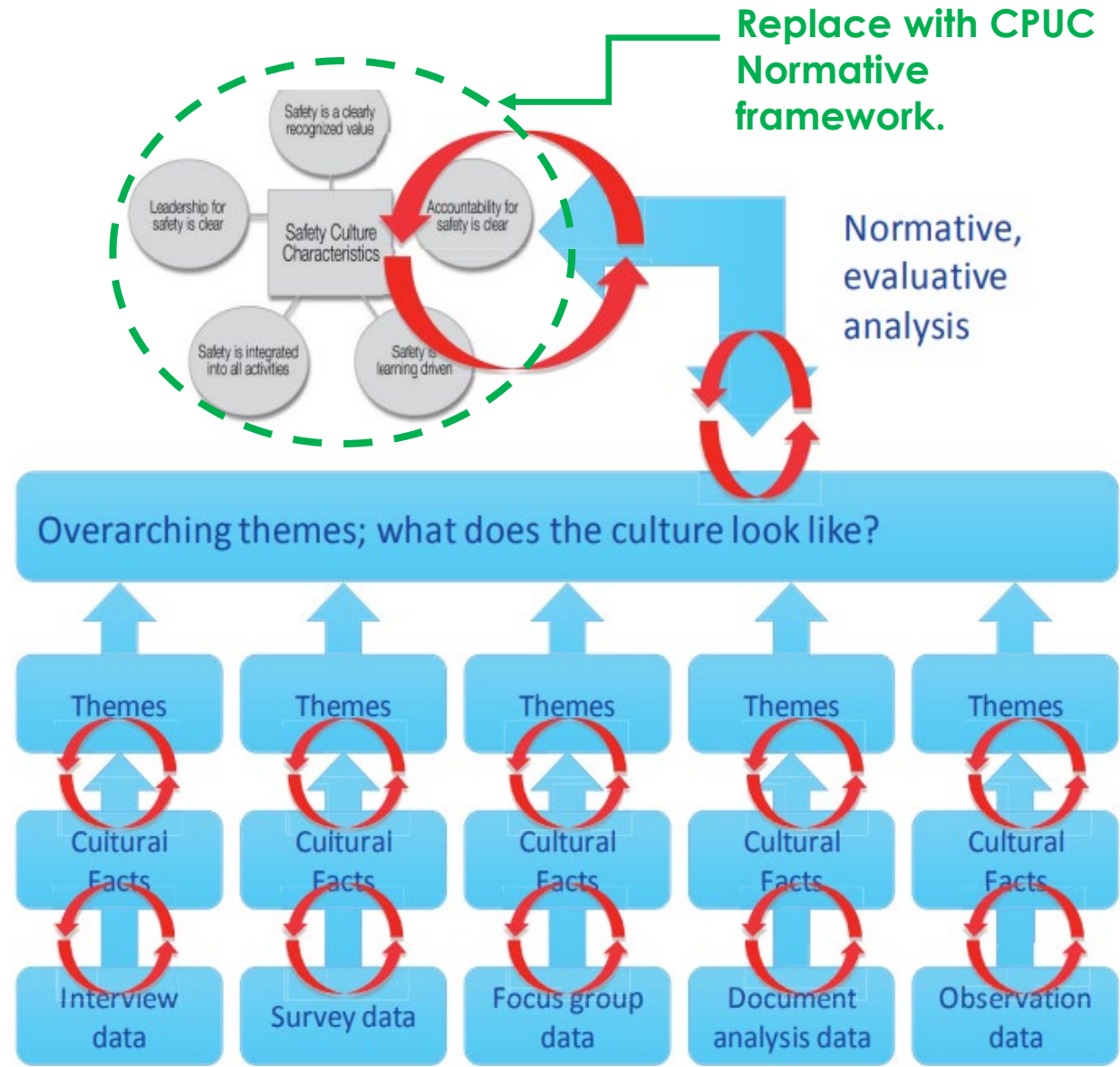
IAEA Data Analysis

Descriptive analysis – description of the current state of culture

- Different data sets are not compared with others at the data level.

Normative analysis - description of what the culture “should be” based on the normative framework.

- Comparing the characteristics found in the descriptive analysis against the ‘expected’ characteristics (normative analysis of safety culture).



Lenses to apply in analysis

Include, but are not limited to (from [Canadian Energy Regulator Assessment Guidance](#)):

- identification of common themes across data collection methods;
- identification of thematic differences across data collection methods;
- identification of data that serve to illustrate the noted cultural themes (e.g., participant quotations, stories or observations);
- disparities between what is said and/or written (i.e., espoused values by leaders and those found in documentation) and what is actually done in practice;
- differences and similarities between sub-groups (e.g., teams, business units, regional offices) and hierarchical levels; and
- identification of any significant observations of patterns of behavior related to safety commitment and tolerance of risk.

Example: SoCalGas/Sempra Safety Culture Assessment

- Report: [Independent Safety Culture Assessment of SoCalGas and Sempra](#)
- Implementation:
 - 64 Interviews
 - 84 Focus groups
 - Interacted with over 700 people
 - Document review – comprehensive
 - 75 Observations

Questions?

Please raise hand, use chat, or use Q&A feature

