

Utility Safety Culture Working Group Expectations

Date: 6/11/2025

The Utility Safety Culture Working Group (USCWG) Rules of Engagement are created to promote effective communication, collaboration, and problem-solving within the USCWG.

- A. What is the purpose?** The USCWG is created to promote collaboration and learning among California Public Utilities Commission (CPUC) regulated electric and gas utilities, regulators (CPUC and Office of Energy Infrastructure Safety (Energy Safety)), and interested entities to continuously assess the safety culture assessment framework outlined in D.25-01-031, in alignment with the safety culture goals and principles adopted therein (Attachment 1). The overarching goal is to effectively support continued safety culture improvement of CPUC regulated gas and electric utilities with a focus on non-punitive engagement, learning, and collaborative principles.
- B. How will the USCWG achieve its purpose?** The USCWG will serve as a forum to facilitate informed and thoughtful discussion and dialogue¹ intended to:
- **Facilitate implementation of the Safety Culture Assessment Framework adopted in D.25-01-031** by gathering participants' input and ideas on implementation of the framework, problem-solving implementation concerns, and informing supplemental guidance, as may be necessary.
 - **Build a shared understanding of the concepts related to safety culture**, its assessment, and improvement amongst participants by offering opportunities for open dialogue supported by relevant expertise, education, training, and resources.
 - **Refine and improve the Safety Culture Assessment Framework**, components, and processes required by D.25-01-031 by gathering feedback from participants on the framework's effectiveness and identifying areas for improvement alongside potential improvements.
 - **Foster understanding of assessment results** by providing opportunities for engagement in constructive dialogue amongst participants on the assessment process and results for each IOU's comprehensive assessment, annual improvement self-evaluations, and their respective follow-up action plans.
 - **Support continuous learning and knowledge-sharing in safety culture advancements** by identifying best practices for safety culture assessment and improvement, hosting and promoting knowledge sharing sessions, and developing tools and guidance to further the USCWG's purpose with its future work.

Participants should expect to engage in educational sessions, discussions, dialogues, presentations, and development of tools and guidance. Participants may be asked to provide informal written or verbal feedback, develop work products, reports, and presentations.

¹ While both dialogue and discussion based on a "humble inquiry" approach are about fostering openness and understanding, dialogues will typically have a deeper focus on exploration and shared meaning, while discussion is more about exchanging viewpoints and finding clarity.

C. Meeting Frequency and Location

- For at least the initial two years, meetings will be held quarterly; additional meetings may be scheduled, as necessary, to address outstanding and/or emerging items.
- Meetings will primarily be conducted virtually, with occasional in-person meetings as may be warranted.

D. USCWG Participants

USCWG “Participant” is defined as any individual who participates in discussing one or more of the topics at the scheduled USCWG meetings in their own capacity or as a representative of an entity. While an entity may bring as many representatives to participate in the discussion as it deems necessary to address the topic, unlimited participation may be restricted for sessions where information flow might be stifled in a larger group. A primary contact/spokesperson for each entity shall be designated for the purposes of notices and document distribution.

Participation by the CPUC’s Safety Policy Division (SPD) and the Joint IOUs (Pacific Gas and Electric, Southern California Edison, San Diego Gas and Electric, and Southern California Gas) is required, while Energy Safety, and any other interested entities, including CalAdvocates, may participate on a voluntary basis.

Participants must regularly attend scheduled meetings. Attendance is needed for discussion continuity.

E. USCWG Facilitator(s)

- An independent subject matter expert facilitator shall be retained to support the group’s objectives.
- SPD shall oversee and lead the USCWG and its activities in partnership with the expert facilitator(s) once the position is filled.

F. Rules of Engagement

To participate in the USCWG, Participants must acknowledge and agree to the following ground rules:

- **Substantial commitment to participation.** Participation requires significant time investment, including regular meetings, research, and active contribution. Participants must commit to participating in quarterly meetings and dedicate the necessary time and effort to ensure meaningful engagement. If unable to continue, Participants should provide adequate notice (i.e., 30-days) and assist in knowledge transfer. Those who miss meetings are responsible for arranging coverage and/or catch up on discussed topics to avoid slowing progress.
- **Dialogue and Discussion principles:**
 - **USCWG will be a “Safe Space.”** Open and frank dialogues should occur without fear of punitive actions by regulators and/or Participants.

- Assume positive intent: Believe that everyone is contributing with the best intentions.
 - Listen actively: Focus fully on the speaker — no interrupting, side conversations, or distractions.
 - Be judicious with the information shared in the group: Recognize that information shared within the group is intended to stay in the group.
 - Foster inclusivity: Encourage participation from all Participants, especially quieter voices.
 - Welcome vulnerability: Make it okay to say, "I don't know," "I need help," or "I was wrong."
- **Practice Humble Inquiry in group engagement:**
 - Ask before telling: Prioritize thoughtful questions over immediate advice or solutions.
 - Be curious, not judgmental: Approach conversations with a genuine desire to understand others' perspectives.
 - Use open-ended questions: Encourage expansive dialogue (e.g., "Can you tell me more about that?" or "What led you to that conclusion?").
 - Acknowledge expertise: Recognize that everyone brings valuable knowledge and experience.
- **Role of Participants**
 - **Work constructively and collaboratively.** Participants must be willing to work constructively and collaboratively to find reasonable approaches for addressing the responsibilities identified in the work plan, recognizing the broader safety culture goals and principles adopted in D.25-01-031 (Attachment 1), including, but not limited to, promoting utility safety culture improvement through non-punitive engagement and collaboration.
 - **Openness to new concepts and different perspectives.** Proactively learn about and continually employ a common understanding of safety culture and related concepts promulgated by the USCWG.
 - **No advocacy beyond utility safety culture improvement.** Consistent with D.25-01-031, the working group exists for the purpose of learning and improvement of utility safety culture, not for advocacy of specific policies, agendas, external interests, or punitive remedies. Discussions should remain focused on constructive exploration and refinement of ideas. Participants should strive for impartiality and avoid promoting personal or organizational agendas. The USCWG is not an opportunity for Participants to relitigate issues or disrupt the adopted framework.

- **Trust.** Audio and video recording devices will not be used in meetings for any purpose. Participants shall not use artificial intelligence tools to summarize or analyze USCWG meetings. Participants are encouraged to explore ideas freely.
- **Responsibility to stay informed.** Stay updated on relevant materials, discussions, and developments. Come prepared for meetings with insights or questions. Share relevant knowledge and resources with the group.
- **Communication**
 - Any or all Participants may meet or conference call amongst themselves between meetings, as desired or necessary, to support advancement of the USCWG’s work.
 - A distribution list of Participants will be used to distribute meeting material and work products.
 - Meetings will be noticed to the service list of R.21-10-001, and to any other participant requesting to participate.
 - Participants are encouraged to bring up emerging topics for consideration at any time.
- **Revisions.** Participants acknowledge that revisions to this document will be made from time to time.

G. Priorities and Preliminary Multi-Year Work Plan

Based on the items included in D.25-01-031.

Priorities Key

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|---|---|---|
| Near-term – within 1 year of USCWG formation | Mid-term – within 2 years of USCWG formation | Long-term – starting 3 rd year of USCWG formation |
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| Key Responsibilities | Actions | Priority | Lead | Timeline |
|------------------------------|---|-----------------|-------------|---|
| 1. Comprehensive Assessments | a) Standardize Third-Party Evaluator Qualifications | Near-Term | SPD | 2 nd quarter, 2025 |
| | b) Industry specific examples of the safety culture framework traits; | Near-Term | IOUs/CalPA | 4 th Quarter, 2025 |
| | c) Reviewing Results | Long-Term | SPD/IOUs | 3 rd Year; annually thereafter |

| Key Responsibilities | Actions | Priority | Lead | Timeline |
|--|--|-----------------|-------------|---|
| 2. Annual Public Workshop | a) Plan and conduct an annual public workshop | Mid-Term | SPD/IOUs | 2 nd Quarter, 2026; annually thereafter. |
| 3. Mechanisms supportive of open-information flow within the IOUs, across the industry, and between the IOUs | a) Confidentiality and non-punitive mechanisms used by INPO, and other mechanisms. | Near-Term | IOUs | 3 rd Quarter, 2025 |
| | b) Nonpunitive reporting | Mid-Term | CalPA | 1 st Quarter, 2027 |
| 4. Improvement Self-Evaluation. | a) Process and Method | Mid-Term | SPD | 1 st and 2 nd Quarter, 2026. |
| | b) Focus areas and indicators for the annual improvement Self-Evaluation. | Mid-Term | SPD/IOUs | 3 rd and 4 th Quarter, 2026 |
| | c) Review of Results | Long-Term | SPD/IOUs | est. 2028; annually thereafter |
| 5. Identify improvements to Framework. | | | ALL | On-going |

Attachment 1: Safety Culture Goals and Principles

To guide and support the collaborative safety culture efforts between the IOUs, the Commission, and interested entities, as well as encourage continuous improvement of IOU safety culture, D.25-01-031 adopted the following goals and guiding principles:

Goals

1. Institutionalize safety as an intrinsic core value beyond regulatory compliance.
2. Develop means for collaborative information-sharing and coordination among all interested entities to recognize risk.
3. Integrate operational safety into safety culture to help prevent catastrophic events.
4. Promote and adopt a systemic approach to safety culture improvement that encompasses each organization's workplace system (i.e. unique interactions between human, technical, and organizational factors).
5. Develop methods and tools to monitor and assess IOU safety culture to facilitate early observation, detection, and mitigation.

Principles

1. All interested entities should have a shared understanding of safety culture.
2. All processes should prioritize engagement and collaboration from the IOU's workforce including contractors; local, Tribal, State, and Federal government entities; environmental and social justice and access and functional needs communities; public interest groups; industry associations; and other key interested entities, as appropriate.
3. Safety culture assessment methods should protect privacy, data confidentiality, and anonymity of individual workers.
4. Open communication, questioning, and reporting should be encouraged for all workers, including contractors.
5. All interested entities should integrate learning and continuous improvement, including learning from and trending of past safety incidents, near-misses, and reported hazard.
6. The Commission recognizes that it can impact, influence, and support the culture of the entities it regulates.
7. Non-punitive engagement and collaboration supports developing and maintaining healthy safety cultures that improve outcomes.
8. The IOUs are owners of, and have full responsibility for, the safety culture of their organizations.