



SOCALGAS REVISED SAFETY CULTURE IMPROVEMENT PLAN

I19.06-014

2/3/2025



Recommendation: SoCalGas should demonstrate how it will mitigate the risk of undermining efforts to emphasize public and infrastructure safety, and how it will build in efforts to effectively promote a speak up culture for non-occupational safety aspects. SoCalGas should also clarify how precisely the interventions will achieve the stated objectives for Action 1.

- SoCalGas agrees that these practices have traditionally been associated with occupational safety practices and agrees that it is important to be thoughtful and intentional in integrating other aspects of safety into these practices
- SoCalGas believes it can expand the value of these tools and foster curiosity through thoughtful development, guidance, and education designed to promote broader conversations about the purpose of the work being performed and how work activities connect to both occupational and process safety considerations

Recommendation: SoCalGas should consider expanding the scope of its proposed corrective action program, whether as part of a phased approach or as part of the immediate effort, to build a system that truly captures a comprehensive breadth of issues from across its organization, including those raised by contractors.

- SoCalGas agrees with the stated intent and purpose – the continuous improvement tracker is intended to create a “tool to systematically increase visibility to the challenges facing an organization while providing accountability and transparency for follow up and resolution”
- SoCalGas agrees that the program could be enhanced through thoughtful expansion and integration of other continuous improvement opportunities as part of future improvement and sustainment

Recommendation: Using the concept of saturation, SoCalGas must continue to perform Learning Team events beyond those currently planned until no new insights, themes, or information is gained relevant to the resource allocation issues that are to be explored. Alternatively, SoCalGas must demonstrate using a data collection effort that is sufficient to yield a thorough and comprehensive data set based on other accepted and valid qualitative assessment method/s.

- SoCalGas agrees that performing saturation analysis on the results of the Learning Teams will support a determination of the sufficiency of the information being gathered through the identified Learning Teams
- In keeping with the goal of an iterative process, SoCalGas can identify this saturation analysis as a new measure for Element 3

Recommendation: SoCalGas should only use the Assessment findings as a baseline for instances where findings, beyond the overarching themes, contain specific data points or observations that are directly related to the benchmark sought. Otherwise, alternate data sources must be used for the baseline metrics.

- SoCalGas agrees there are opportunities to enhance the value of the proposed measures to inform and shape internal decision-making and external transparency
- SoCalGas can expand upon the baselines and further explore and identify meaningful measures – as an example, SoCalGas’s most recent quarterly report included expanded details on the measure baselines:

Baseline

SoCalGas proposes using qualitative findings and recommendations in the 2EC Report as a baseline. The 2EC Report finds the following regarding meetings/calls and areas in need of attention related to comprehensive safety and a questioning and learning environment.

- “During System Status calls at SoCalGas, other than an initial Safety Tip, no mention of safety was made around the work processes being discussed.” 2EC Report at 27.
- “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.” 2EC Report at 27.

Recommendation: SoCalGas should offer additional clarity is necessary on what a more comprehensive view of safety means to SoCalGas with respect to Element 1, how it will be achieved, and how it will be measured. In doing so, the focus should be on the non-occupational aspects of safety for success at broadening the concept of safety.

- SoCalGas defines a comprehensive safety as including employee, public, infrastructure, and contractor safety
- The Revised Plan proposes advancing a *broadened* concept of safety through changes to organizational processes and conversations (e.g., training, education, goals, practices, policies, observations, etc.)
- The measures are intended to measure changes in how safety is understood and discussed at SoCalGas – with increased focus on non-occupational aspects of safety

Recommendation: To support continued improvement, as expected by Principle d) of Scoping Memo, SoCalGas should develop and use a formalized framework of practices and processes that outline how monitoring of implementation and adjustment of the Revised Plan will be performed to support the PDCA approach proposed in the Revised Plan.

- SoCalGas safety culture improvement efforts leverage an integrated project management framework for planning and implementation, which is cross-functionally advanced, owned, and supported
- Regular meetings are held to support project management rigor, integration and alignment (e.g., through further culturally focused co-creation sessions), and measurement and transparency
- Program engages in ongoing review and monitoring of progress and effectiveness through plans and charters, the proposed measures, and stakeholder reporting and engagement

Recommendation: The Revised Plan should evolve via plan iterations that continue through to the next safety culture assessment (i.e., assessment required by R 21-10-001). At that time, the Revised Plan may be replaced with a new plan based on the results of the future assessment. Interventions that are not yet specific or implementation that extends beyond the proposed two-year timeframe should also be detailed as part of future iterations of the Revised Plan and subject to the same approach and expectations set for the Revised Plan

- SoCalGas supports this suggestion for continued evolution as part of ongoing sustainment and continuous improvement

Thank You