

D.25-01-031 Expectations for Safety Culture Improvement Monitoring

Requirements for USCWG Topic 4: Annual Improvement Self-Evaluations

I. Summary

D.25-01-031 (Decision or Phase 1 Decision) provides that:

- The framework is intended to support continuous improvement (Decision Appendix A).
- The Comprehensive assessment results are intended to provide the basis for improvement actions. (D.25-01-031 at 28).
- The Commission determined that a Comprehensive Assessment every four years is not sufficient to manage improvement (D.25-01-031 at 28).
- Annual Self-Evaluations are intended to serve as a roadmap for continuous improvement (D.25-01-031 at 32).
- Indicators are expressly intended to monitor the effectiveness of improvement efforts (D.25-01-031 at 32).
- Senior management is to conduct the Self-Evaluation using focus areas and indicators (D.25-01-031 at 32–33).
- Establishes the common focus areas and indicators for all IOUs (Decision at 33).
- Establishes use of both qualitative and quantitative indicators (Decision at 33).
- Each utility must also have custom focus areas and indicators linked to its assessment results and improvement efforts (D.25-01-031 at 33).
- The Working Group is expected to develop and refine the focus areas and indicators.
- The Commission identifies as an initial Working Group priority — D.25-01-031 at 38).
- The Self-Evaluation is intended to be more limited than the Comprehensive Assessment. (D.25-01-031 at 41).
- Annual filings must report both improvement efforts and results (D.25-01-031 at 44–45).
- Self-Evaluation results are intended to be validated against the next Comprehensive Assessment (D.25-01-031 at 29 and 59).

II. D.25-031-031 Provisions

a. The framework is intended to support continuous improvement.

In describing the improvement model underlying the framework, the D.25-01-031 (Phase 1 Decision) states:

“The Staff Proposal uses a systematic approach for continued safety culture improvement. It consists of a four-step process: (1) assessment; (2) development of plans and actions in response to the assessment; (3) monitoring and tracking implementation of improvement plans; and (4) reviewing and revising improvement plans and actions in response to monitoring and tracking. This process is repeated on an ongoing basis.” (See Appendix A Phase 1 Decision: Continued Improvement Cycle, also discussed at the USCWG 2026 Q2 meeting).

The Decision then identifies the two tools supporting that process:

“The Staff Proposal also recommends applying two tools to support the continued safety culture improvement process: (1) a Comprehensive Assessment conducted every four years;

and (2) an annual, improvement Self-Evaluation to monitor and track progress in-between the Comprehensive Assessments.”

b. The Comprehensive assessment results are intended to provide the basis for improvement actions

The Decision expressly connects assessment insights to improvement actions: (D.25-01-031 at 28):

“Functionally, the Comprehensive Assessment shall provide the IOUs and their leadership with insights on the potential safety culture strengths and weaknesses and form the basis for improvement actions. The IOUs should translate the cultural insights gained from the assessment into actionable improvements.”

“The insights gained from this assessment should result in IOUs implementing effective improvement efforts, strengthen their safety culture, and ultimately minimize potential negative safety outcomes.”

c. The Commission determined that a Comprehensive Assessment every four years is not sufficient to manage improvement

D.25-01-031 at 32 and Finding of Fact (FoF) 19:

“Bringing awareness to safety culture weaknesses through Comprehensive Assessments every four years is not sufficient to embed continued improvement. Leaders must act on the insights gained and continually manage the improvement process.”

The Decision then explains what monitoring is intended to enable (FoF 20):

“To manage the process, it is critical to know if key practices are having the intended impact, course correct as necessary, and gain awareness of possible cultural decline in real-time.”

The Commission therefore directs the IOUs to conduct annual Self-Evaluations (Conclusion of Law (COL) 8 and Ordering Paragraph (OP) 13).

OP 13: “The Safety Culture Assessments for Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company shall consist of a Comprehensive Assessment and an annual Self-Evaluation.”

d. Annual Self-Evaluations are intended to serve as a roadmap for continuous improvement.

D.25-01-031 at 32 and FoF 21:

“These annual Self-Evaluations shall serve as a roadmap for the IOUs’ continuous improvement and to allow effective tracking of safety culture improvement actions in between the Comprehensive Assessments.”

This language places the annual Self-Evaluation within the continuous-improvement process rather than treating it as another comprehensive assessment.

e. Indicators are expressly intended to monitor the effectiveness of improvement efforts

D.25-01-031 at 32:

“The Self-Evaluation shall use indicators to monitor the effectiveness of improvement efforts and implementation of best practices that support safety culture advancement prior to the next Comprehensive Assessment.”

This is the clearest Phase 1 statement concerning the function of indicators: they are to monitor effectiveness of improvement efforts, as well as implementation of best practices.

f. Senior management is to conduct the Self-Evaluation using focus areas and indicators.

D.25-01-031 at 32–33:

“The Self-Evaluation shall consist of the IOU’s senior management self-evaluating its organization on a series of focus areas and indicators that monitor: (1) each IOU’s improvement actions in between Comprehensive Assessments; and (2) each IOU’s implementation of best practices that support safety culture advancement relative to the Normative Framework.”

“The self-assessments should help advance strategic planning for implementing best practices, identify areas of intervention specific to each IOU’s culture, and support IOUs moving closer to the desired characteristics in the Normative Framework.”

The focus areas and indicators are not presented simply as reporting categories; they are the structure through which senior management evaluates improvement between Comprehensive Assessments.

g. Establishes the common focus areas and indicators for all IOUs

Decision at 33:

“Safety Policy Division, in collaboration with the Utility Safety Culture Working Group, should develop a common set of focus areas for use by all IOUs in Self-Evaluations and a set of indicators related to those focus areas that support advancement of the traits in the Normative Framework.”

The Decision therefore connects the common indicators to the common focus areas, and connects both to advancement of the Normative Framework.

h. Establishes use of both qualitative and quantitative indicators

Decision at 33:

The Decision expressly provides:

“Indicators shall include a mix of both qualitative and quantitative measures.”

The Phase 1 Decision does not, however, prescribe a more detailed universal set of criteria for determining whether a particular indicator is adequate. That detail is left for subsequent implementation and refinement.

i. Each utility must also have custom focus areas and indicators linked to its assessment results and improvement efforts

D.25-01-031 at 33

Separate from the common set, the Commission directs:

“We direct each IOU to develop and implement a custom set of focus areas and indicators that are directly linked to safety culture assessment results and tailored to that IOU’s improvement efforts.”

This is an important distinction in the Phase 1 because the Decision contemplates both:

- **Common:** focus areas and indicators used by all IOUs and supporting advancement of Normative Framework traits.
- **Utility-specific:** focus areas and indicators directly linked to that IOU's assessment results and tailored to its improvement efforts.

j. The Working Group is expected to develop and refine the focus areas and indicators.

The Commission identifies as an initial Working Group priority (— D.25-01-031 at 38):

“implementation of the improvement Self-Evaluations, including, but not limited to developing: ... (3) focus areas and indicators for the annual improvement Self-Evaluation.”

For the longer term, the Commission directs that the Working Group's activities include:

“periodically reviewing and updating focus areas and indicators for the annual improvement Self-Evaluations based on ongoing research and development.”

This indicates that the Commission did not intend the initial focus areas and indicators to be a “one and done”, but to continually improve.

k. The Self-Evaluation is intended to be more limited than the Comprehensive Assessment.

D.25-01-031 at 41:

“The improvement Self-Evaluation is intended to monitor effectiveness of continued improvement efforts and best practices that support safety culture advancement, on an annual basis, relative to the Normative Framework.”

It then distinguishes the annual process from the deeper assessment:

“Unlike the Comprehensive Assessment, which provides a deep picture of the safety culture – including the underlying values, beliefs, and norms – the Self-Evaluation is a more limited pulse check of the ‘visible’ actions through safety culture outcomes and indicators.”

This is useful for defining the intended scope of the annual process: the Self-Evaluation is improvement monitoring, not a replacement for the deeper cultural inquiry conducted through the Comprehensive Assessment.

l. Annual filings must report both improvement efforts and results.

D.25-01-031 at 44–45 and OP 16 :

The Commission requires annual Self-Evaluations to discuss:

“(a) the organization’s efforts and results from their continuous safety culture improvement efforts relative to the Normative Framework; and (b) the results from their senior management self-evaluating its organization on a series of focus areas and indicators...”

Those focus areas and indicators must include:

“(1) best practices that were implemented to support safety culture advancement relative to the Normative Framework; (2) advancement of any strategic planning for implementing safety culture relative to the Normative Framework; and (3) efforts of the organization that are moving it toward the desired characteristics of the Normative Framework.”

m. Self-Evaluation results are intended to be validated against the next Comprehensive Assessment.

D.25-01-031 at 29 and 59:

“To understand the accuracy of the annual improvement self-evaluation results and effectiveness of the annual requirements, the review should validate the results of the self-evaluations against the Comprehensive Assessment to identify and interpret gaps, differences, inconsistencies, and similarities.”