Technical Working Group Meeting #4: Safety Culture Maturity Model and Indicators

Thursday, June 28, 9:00am-2:00pm

R.21-10-001: ORDER INSTITUTING RULEMAKING TO DEVELOP SAFETY CULTURE ASSESSMENTS FOR ELECTRIC AND NATURAL GAS UTILITIES



California Public Utilities Commission

Welcome and Introduction

9am-9:20am

R. 21-10-001 Background

Goal of proceeding: To develop and adopt a safety culture assessment framework and process for regulated investor-owned electric and natural gas utilities and gas storage operators, in fulfillment of SB 901 and other Commissions oversight responsibilities

Summer Technical Working Group Meetings

Thursday June 16, 9am-3pm	Technical Working Group Meeting #1	Safety culture definitions and framework
Friday June 24, 1pm-4pm	Technical Working Group Meeting #2	Collaborative approaches to safety culture
Friday July 22, 1pm-3pm	Technical Working Group Meeting #3	Safety culture assessment methods, schedule and process
Thursday July 28, 9am-2pm	Technical Working Group Meeting #4	Safety culture maturity model, indicators, and metrics

Meeting Objective

Continue to develop a shared understanding to answer the following scoping questions:

- What framework mechanisms could be implemented to ensure safety cultural assessments are focused on actual safety improvement (on the ground results) within the industry?
- What safety outcomes or metrics should be used to evaluate the efficacy of the safety culture assessment process developed within this proceeding?
- What methodologies should be employed in the safety culture assessments to ensure results are comparable across our regulated entities and can measure changes in our regulated entities' safety culture over time?
- Should the Commission formally adopt a maturity model to use in safety culture assessments for all electric and gas utilities, and gas storage operators?

Meeting Agenda

Time	Торіс
9:00am-9:20am	Welcome and introduction
9:20am-10:20am	Safety culture maturity model
10:20-10:30am	Break
10:30am-11:00am	Safety culture indicators
11:00am-12:00pm	Western Area Power Administration
12:00pm-1:00pm	Lunch
1:00pm-1:45pm	Facilitated discussion
1:45-2:00pm California Public Utilities Commis	Closing and next steps

Virtual Housekeeping

- Recording; Slides
 - Please note that this meeting is being recorded
 - Workshop recording and slides will be sent to the service list and posted on the CPUC website after the meeting

Questions

- Please type questions into chat, use Q&A feature, or raise hand
- Q&A sessions throughout presentations + longer discussion at the end of workshop
- Staff will follow to respond to any unanswered (or additional) questions after the workshop

• Timing

- To be respectful of everyone's time, we will maintain scheduled starting times for each presentation outlined in the agenda
- Additional topics will also be covered in subsequent technical working group meetings or workshops

• IT Support

Jorge De Ocampo, Marcos Rodriguez, and Jeremy Holloway

Virtual Housekeeping, Continued



Opening Remarks

Safety culture maturity model

Safety Policy Division, BSMS, and Motive Power 9:20am-10:20am

Agenda

- Challenges facing the CPUC in creating a Safety Culture regulatory process
- The Motive Power BSMS Safety Culture maturity model PURE (Public Utility Risk Evaluation)
- Staff recommendations and options

Challenges of Safety Culture Regulation

Challenge 1: Safety culture is an evolving science

Functionalist Approach

- Culture is "top-down," or driven by management
- We can engineer culture through actions that address management system faults, people's behavior, risk assessment, and decision-making
- Favored by managers and practitioners

Interpretative Approach

- Culture is "bottom-up," or socially constructed by members of the organization
- To change culture, we need an indepth understanding of assumptions and attitudes
- Favored by social scientists

Which approach is best?

Challenge 2: Mandating safety culture?

- Culture includes "behaviors, norms, knowledge, beliefs."
- Safety Culture represents a public good that should be prioritized and encouraged.
- Is it possible or even appropriate to mandate beliefs?

How can the evolution of a culture be best influenced?

Challenge 3: Safety culture is not necessarily homogeneous

Focus Area	Business unit	Region	Commodity	Senior Manager/ Contractor Front line
Occupational	A level	A-Level	B- Level	B level
Process	D-Level	B level	D-Level	A level
Strategy	A level	D-Level	C-Level	C level
Investment	D-Level	D-Level	D-Level	D-Level

Which safety culture are we talking about?

Challenge 4: The scoring paradox

- Maturity model create a score and a scale against which safety culture can be evaluated.
- Scores are used to assess and quantify progress and maturity.
- Assessing Safety Culture on an established fixed scale (i.e., scoring) might reinforce a "check-the-box" culture and inadvertently create a disincentive to improve safety culture.

What is the right assessment process?

Challenge 5: Learning and growing safety cultures

- Many unknown elements of the safety culture of an organization have yet to be identified.
- Many unknowns exist in how to assess safety culture.
- How can we develop an environment where IOUS and the CPUC can share information to learn and develop best practices in Safety culture?

The Public Utilities Risk Evaluation (PURE)

The Safety Culture Maturity Model

The safety culture assessment maturity model (PURE)proposed framework establishes an anchor for prioritizing safety culture improvements in an IOU's portfolio

- Assumption: Safety culture is under the control of the Executive and senior management.
- A set of actions represents a portfolio of options for the IOU.
- Assessments create a measure to assess to prioritize to achieve results.

Maturity model overview

The proposed maturity model will quantify improvements in, and define best practice for safety culture



The Tier 1 model comprises 10 functional domains that describe the behaviors, actions and characteristics of 5 progressive levels of safety culture maturity.

At Tier 2, each functional domain is described by a discrete maturity model, each containing a magnitude more attributes than the corresponding Tier 1 model.

Tier 3 contains an extensive suite of leading, current and lagging indicators to quantify past performance and predict future performance.

Driving cultural change

• The proposed maturity model will support each step of California IOUs journey to improve their safety culture.



Maturity model development process

1. Literature Review

- Thorough and detailed review of ~30 years Safety Culture of academic & industrial practice
- 2. Defined functional domains

\odot 3. Develop Tier 2 & 3

- 1. Identify attributes that represent best practice for Tier 2
- 2. Categorize attributes into T2 Focus Areas
- Align industrially proven indicators to T1 & T2 Focus Areas



2. Define Attributes γ

- 1. Identify attributes based on evidence from academia and industry
- 2. Filter attributes to identify most representative attributes for Tier 1
- 3. Refine Focus Areas
- 4. Review alignment of attributes to Utility industry and practices
- 5. Collect feedback from CPUC Core Team



- 1. Analyze Safety Performance Metrics
- 2. Interview Utility Staff
- 3. Calculate correlation between outcome metrics and Model

Within each domain, there are five levels of maturity

Commanding

Continual safety culture improvement is in the entities DNA at all levels. Safe-production is a mantra and the horizon is scanned for potential safety issues a routine part of everyday activities.

Committing

The organization goes beyond minimal compliance in safety and is striving to achieve its safety culture mission and goals to greatly reduce the potential for harm in the workplace and the community.

Complying

The goal of an organization is to just meet the minimum requirements which satisfy the regulators, auditors, customers, and stakeholders that things are being done to protect people, assets, and the environment.

Coasting

A minimal effort being invested in improving safety strategy and processes, no clear direction, or systematic attempt, to improve safety.

Commencing

Rudimentary, ad-hoc and chaotic safety processes, lacking structure and largely depending upon the knowledge, skills, and abilities of those doing the work.



The 10 functional domains are based on Seven Broken Safety Cultures, which are consistent root cause themes from major safety catastrophes. To reinforce the role of leadership in the creation of a positive safety culture, we also introduce three core business tools

7 Broken Safety Cultures **3** Core Business Tools Profit Before Safety Strategy Just Culture **Risk Assessment** Corrective and Preventative Actions (CAPA) Safety Leadership Managerial Compliance Safety Communication Safety Competence Lessons Learned

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Strategy

Risk Assessment

Profit Before Safety

Just Culture

Safety Leadership

Managerial Compliance

Safety Communication

Safety Competence

Lessons Learned

Corrective and Preventative Actions (CAPA)

Risk Assessment

Risk assessment is the bedrock of most international safety management system standards and/or regulation,. Risk refers to 'the possibility of harm or loss' presented by the existence of perceived threats arising from situations. Every aspect of operations presents their own threats, and these require formal risk assessments to ensure no harm is experienced to people or assets



Strategy

Risk Assessment

Profit Before Safety

Just Culture

Safety Leadership

Managerial Compliance

Safety Communication

Safety Competence

Lessons Learned

Corrective and Preventative Actions (CAPA)

Profit Before Safety

Instances where productivity comes before safety, as safety is viewed as a cost, not an investment. Ideally, an organization would adopt the philosophy that 'safeproduction' is the number one priority, and configure all their processes, resources, and actions accordingly.

Tier 1 Focus Areas



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Core Business Tools

7 Broken Safety Cultures



Strategy

Risk Assessment

Profit Before Safety

Just Culture

Safety Leadership

Managerial Compliance

Safety Communication

Safety Competence

Lessons Learned

Corrective and Preventative Actions (CAPA)

Safety Leadership

Blinkered leadership and the prevailing corporate culture can prevent the recognition of risks and opportunities. In turn, this leads to wrong safety decisions being made at the wrong time, for the wrong reasons. This often stems from leader's lack of knowledge about their safety responsibilities and associated accountabilities; their freedom to act to address safety issues; and a lack of knowledge about pertinent aspects of the safety management system that apply to their sphere of influence

Tier 1 Focus Areas



Strategy

Risk Assessment

Profit Before Safety

Just Culture

Safety Leadership

Managerial Compliance

Safety Communication

Safety Competence

Lessons Learned

Corrective and Preventative Actions (CAPA)

Managerial Compliance

Eighty percent of process safety disasters occur during normal routine everyday operations (64%) and maintenance (16%). This indicates that safety culture improvement initiatives should mostly focus on management and their compliance to rules, procedures, and standards; although it is recognized there can also be non-compliance amongst the workforce and contractors.



Strategy **Safety Communication** Poor communication has been shown to be a major contributor in **Risk Assessment** concerned with resolving the problems of 'miscommunication'; where Profit Before Safety recipients. Just Culture **Tier 1 Focus Areas** Safety Leadership Two-Way Messaging Language (Understood) Flow (Acted (Received) Managerial Compliance Upon) **Tier 2 Focus Areas** Safety Communication Communications System – Presence, Communications System – Managerial Control Message Acted Upon Safety Competence Message Understood Message Received Lessons Learned Corrective and Preventative Actions (CAPA)

Strategy

Risk Assessment

Profit Before Safety

Just Culture

Safety Leadership

Managerial Compliance

Safety Communication

Safety Competence

Lessons Learned

Corrective and Preventative Actions (CAPA)

Safety Competence

Competency failures are highlighted in many inquiries into safety catastrophes where there were false expectations that direct hires and contractors were highly trained and competent. Competence is multidimensional and includes [a] Cognitive Competence: the ability to learn facts and principles; [b] Functional Competence: the ability to make decisions, plan work, do the work, and solve problems; and [c] Enabling Competence: the ability to lead, communicate, interact with others, and work in a team

Tier 1 Focus Areas



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Core Business Tools

7 Broken Safety Cultures

Strategy

Risk Assessment

Profit Before Safety

Just Culture

Safety Leadership

Managerial Compliance

Safety Communication

Safety Competence

Lessons Learned

Corrective and Preventative Actions (CAPA)

Lessons Learned

'Lessons learned' refers to situations where critical safety information was not extracted from near-misses and/or adverse events; where it was not shared in a timely manner or was not shared at all; nor was the lesson learned enforced. To be termed a lesson learned, there must be an observable and measurable positive change in the behavior(s) associated with the lesson that improves performance in some predefined way.

Tier 1 Focus Areas



Strategy

Risk Assessment

Profit Before Safety

Just Culture

Safety Leadership

Managerial Compliance

Safety Communication

Safety Competence

Lessons Learned

Corrective and Preventative Actions (CAPA)

Corrective and Preventative Actions (CAPA

Corrective and Preventative Actions (CAPA) refers to organizational action(s) required to rectify and/or eliminate future potential adverse events. Corrective actions are aimed at an adverse event that has already occurred, whereas a preventative action is aimed at reducing the potential for an adverse event to occur. Based on a risk assessment of a potential incident and/or a root cause analysis of an incident, effective corrective action and preventive action (CAPA) systems are a key component to continuous improvement FDA.

Tier 1 Focus Areas



The PURE assessment process

The proposed assessment process will establish a transparent and auditable trail of the process to measure safety culture. It can be undertaken by an independent third party or as a self assessment with CPUC audit for validation purposes.



Model scope and reliability

The proposed 10 functional domains comprehensively cover the known causes of all safety catastrophes in the last 30 years. Further, we have demonstrated the model to be the first known safety culture maturity model with concurrent validity (actionable conclusions may be drawn from the data).

Safety Performance Metrics

- Data cleaned and anchored to region
- Regions Ranks by Performance

Identify Utility Staff to Interview

- Priority 1: Inspection & Maintenance, Asset Owners, Construction Managers
- Priority 2: Regional H&S Managers, Asset Management, Operations

Score Region's Safety Culture

• Based on 10 questions derived from Maturity Model Functional Domains

Calculate Reliability

- Statistically "Adequate" reliability for IOS Safety Metrics & Interview Data
- Negative Correlation (Good!) of -0.72 for Personal Safety Metrics
- Complex findings for Process Safety, creates opportunity for CPUC to lead Globally
Complementing existing initiatives

The proposed safety culture maturity model and assessment process completement and reinforce ongoing work by OEIS.

- OEIS Engaged Boston Consulting Group (BCG) in 2020. 5 tools were created:
 - 1. Wildfire Mitigation Plan Guidelines
 - 2. Utility Wildfire Maturity Model & Assessment
 - 3. Utility Survey
 - 4. Wildfire Mitigation Plan Metrics
 - 5. Supplemental Data Request
- The OEIS Wildfire Maturity Model had been developed to assess the maturity of very technical aspects of wildfire mitigation
- The Utility survey comprises an employee survey and a Utility Self Assessment. The Employee survey is a measure of safety climate (indicated by the use of a Likert Scale), which measures sentiment in the moment, and is known to be highly variable. A mapping of the employees survey and Self Assessment to the proposed functional domains is adjacent (click through Animation).

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Mapping of Employee Survey to Proposed Maturity Model Domains										
	Strategy	Risk Assessment	Profit Before Safety	Just Culture	Safety Leadership	Managerial Compliance	Safety Comms	Safety Competence	Lessons Learned	CAPA
Primary Relationship	1	0	4	11	6	2	0	3	3	0
Secondary Relationship	0	7	2	0	4	0	10	0	0	0
management condition effectiveness management and inspections assessments										

Mapping of Utility Self Assessment to Proposed Maturity Model Domains

	Strategy	Risk Assessment	Profit Before Safety	Just Culture	Safety Leadership	Managerial Compliance	Safety Comms	Safety Competence	Lessons Learned	CAPA
Primary Relationship	0	6	1	0	2	1	2	6	2	2
Secondary Relationship	1	2	0	2	2	2	2	0	1	0
and community sh engagement oth	aring with er utilities	mitigation initiatives	IIIC Popula	10110 I	agencies	stakeholder	5			

OEIS Maturity Model

Options for Regulating Safety Culture

Basic assumptions of the proposed safety culture assessment process



Learning, proactive engagement, and continuous improvement are essential elements of improving safety cultures

Continuous improvement process for safety culture



Safety culture assessment timeline



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Comprehensive assessments; maturity model review and update every four years

Synopsis

- Estimated timeframe: 6 months
- <u>Methods</u>: Interviews, focus groups safety culture perception survey, document review, observations, plus audit of self-assessments, gap analysis, and maturity model recalibration
- <u>Assessor</u>: Independent third party

Purpose

- Keeps the utilities accountable by verifying and validating results of annual assessments
- Identifies blind-spots that the annual assessments may have missed
- Allows CPUC to modify the maturity model and guidelines for the annual assessment to reflect findings

Comprehensive assessments has three elements and produces two distinct follow-up processes



Annual self-assessments

Synopsis

- Estimated timeframe: 1 month
- <u>Methods</u>: focus group exercises, site observations, documentation analysis, personnel interviews, review of safety climate survey results, and review of safety management system audits
- <u>Assessor</u>: Utilities, with possible help of an independent third party for validation

Purpose

- Serves as a progress report to monitor safety culture between comprehensive four-year assessments
- Provides a roadmap for improvement
- Helps to ensure utility ownership of their safety culture
- Creates a track record of data that can be analyzed during the fouryear assessment

Proposed safety culture assessment process

The proposed assessment process will establish a transparent and auditable trail of the process to measure Safety Culture, while integrating existing data streams to ensure assessments are reliable and valid.



BREAK

10:25am-10:35am

Safety Culture Indicators

10:35am-11:00am

Tier 3 of the PURE model includes a suite of Safety Culture indicators



The Tier 1 model comprises 10 functional domains that describe the behaviors, actions and characteristics of 5 progressive levels of safety culture maturity.

At Tier 2, each functional domain is described by a discrete maturity model, each containing a magnitude more attributes than the corresponding Tier 1 model.

Tier 3 contains an extensive suite of leading, current and lagging indicators to quantify past performance and predict future performance.

Each functional domain has a set of indicators to monitor the status of that domain

Allows **tracking** of corrective action and improvement initiatives are implemented in each of the 10 domains:

Profit Before Safety	Strategy
Just Culture	Risk Assessment
Safety Leadership	Corrective and Preventative Actions (CAPA)
Managerial Compliance	
Safety Communication	
Safety Competence	
Lessons Learned	

Leading, lagging, and current indicators have been defined for each Tier 2 focus area in the PURE model

A few examples from the Safety Leadership functional domain:

Satety	TI	T2	T3	T3	T3	
Leadership	Focus Areas	Focus Areas	(Lagging Indicators)	(Current Indicators)	(Leading Indicators)	
	Responsibility	Leadership Responsibilities	 Number of management interactions with employees Number of safety inspections per month Number of legal or internal standards non-conformances identified during safety inspections Number of times senior management attended safety meetings Percentage of employees working excessive hours 	 Frequency of management interactions with workforce Percentage of hours worked that managers are present with workforce to provide guidance and support Percentage of products/services assessed for their health & safety impacts 	 Number of times work activities have been stopped due to unsafe conditions or acts 	
	Accountability	Leadership Accountability	 Number of personnel within organization positively recognized for safety excellence Number of safety goals met 	 Frequency of managerial observations per day Number of employees volunteering for initiatives Number of managers /supervisors participating in critical design reviews 	 Ratio of unsafe conditions or acts coming from management versus workforce personnel Ratio of near-hit reports coming from management versus workforce personnel Frequency of safety meetings attended by senior management Percentage of safety meetings attended by senior management Percentage Safety Leadership scores are meeting targets Percent of positive ratings of managers and supervisors by employees 	

SPD proposes working with the IOUs to maintain the integrity, veracity, and validity of the list of indicators to ensure their relevance and applicability

Developing indicators is likely an ongoing process that could continue with the utilities after the proceeding and:

- Could build on existing work such as <u>North American Regulators Working</u> <u>Group on Safety Culture: Safety Culture Indicators Research Project (2016)</u>, which aimed to identify a suite of safety culture indicators that could be used to facilitate greater awareness and understanding of cultural threats and defenses in the oil and gas industry.
- Should align with but not duplicate existing work such as Safety Performance Metrics and Energy Safety's annual safety culture assessments.

Questions?

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



Operationalizing Safety Outcomes

Western Area Power Administration 11:05am-12:00pm



WAPA/CPUC Safety Culture Workshop

Safety Culture/System Reliability Maturity Models Ricardo Velarde Chris Lyles July 28, 2022



Topics for Today

- WAPA overview
- Asset Management
- Geographical Information System (GIS)
- Field Strategy for Wildfire Mitigation and Vegetation Management





Power Marketing Administration





Our power comes from



- Hydroelectric energy produced at federal generating agencies
- Multipurpose projects
- Variable water availability







WAPA's Core Values

- Listen to understand, speak with purpose
- Seek. Share. Partner.
- Respect self, others, and the environment
- Do what is right. Do what is safe.
- Be curious, learn more, do better. Repeat.
- Serve like your lights depend on it.



Asset Management

- Asset data collected routinely from field crew inspections
- Field data is captured and retained in work management databases
- Health index and consequence of failure is derived
- Risk-based data drives asset maintenance and replacement decisions





Geographical Information System (GIS)

- System of record of transmission line inspections
- Transmission line inspections include physical and vegetation
- Map-based representation of transmission system and inspection results
- Includes layers such as weather, lightning, wildfire potential, etc. for WAPA's transmission footprint





WAPA SNR Vegetation Management and Wildfire Mitigation Program

- Program overview
- Staffing and support
- Service area





WAPA SNR Wildfire Mitigation Plan

- Plan overview
- Goals and objectives
- Accomplishments and challenges





Understanding the Hazards and Risks

- Site conditions
- Equipment
- People on the job
- Situational awareness





Mitigating the Hazards and Risks

- Layers of protection
- Using available tools and resources
- Experienced managers and field personnel
- Communication



Lessons Learned

- Documenting and analyzing incidents and near-misses
- Adapting and modifying programs to incorporate lessons
- Sharing experiences and takeaways



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LUNCH

12:00pm-1:00pm

Facilitated Discussion, Next Steps, and Closing

1:00pm-2:00pm
Facilitated Discussion

- Is the PURE maturity model compatible with maturity models used internally by the IOUs?
- How should the Commission maintain and improve the integrity, veracity and validity of safety culture indicators that track and monitor improvement within each domain?

Next steps: Written feedback

• Written feedback for TWG #1 and #2:

- Comments due August 15
- Reply comments due August 29

• Written feedback for TWG #3 and #4:

- Instructions will be sent after today's meeting

Next steps: Upcoming meetings

• All-party meeting – early fall 2022:

- Debrief information discussed in TWGs to date
- Review and synthesize feedback received in rulings after the TWGs
- Provide additional input on scoping memo questions (including assessment process, independent third party to conduct assessments, and indicators)
- Discuss next steps for developing staff proposal

• Final workshop – mid fall 2022:

• Discuss and provide feedback on draft staff proposal and maturity model

Closing Remarks

Questions?

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



THANK YOU