

# APPENDIX M

## **2EC Report Areas in Need of Attention Mapping to SoCalGas Actions**

SoCalGas recognizes the 2EC Report and associated Areas in Need of Attention (below) represent, “the reality of the members of the organization through their perceptions, values, beliefs, and understandings and are influencing the organizational behaviors.”<sup>1</sup> Accordingly, SoCalGas has devoted significant time and energy exploring the 2EC Report through dialogues and co-creation sessions to analyze and understand the cultural drivers or basic assumptions that are creating and shaping these more observable manifestations of culture. The Plan details our actions, along with summaries of learnings and activities, to understand the cultural basis of our challenges, opportunities for improvement, and proposed change elements.

In co-creating our cultural understanding and proposing Safety Culture Improvement Plan, we integrated the conclusions and recommendations of the 2EC Report into the analysis and supplemented that information with learnings from our dialogues. In so doing, the elements of our Plan are based on a foundational understanding of the 2EC Report and are intended to enable a holistic change and improvement effort to change culture by influencing and shaping the assumptions or beliefs that impact actions and performance. That noted, we also cross referenced our change and improvement elements to each of the Areas in Need of Attention to one (or more) of the four Improvement Elements. In this way, we could “check” our plan and analysis. Through this effort, SoCalGas identified improvements; verified that our change and improvement elements and actions align with underlying drivers for the areas in need of attention identified by 2EC; and recognize the need for ongoing reporting, measurement, and assessment to verify that our improvement and change actions are impacting and influencing culture as intended. In identifying the elements below, SoCalGas identified the following interconnected goals and objectives:

- Element 1: Communicate and implement a comprehensive approach to safety
- Element 2: Foster and celebrate curiosity and empower employees and contractors to speak up, question, and share their ideas
- Element 3: Commitment to engaging in collective efforts to understand organizational challenges and better prioritize resources
- Element 4: Advance collaboration and an integrated management system through enhancements to our Safety Management System.

---

<sup>1</sup> 2EC Report at 6.

***Overarching Theme 1 - Safety is most often perceived as personnel safety.***

Area in Need of Attention	SoCalGas Action
<p>Public Safety and Security were seldom discussed in the conversation around safety.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• During System Status calls at SoCalGas, other than an initial Safety Tip, no mention of safety was made around the work processes being discussed.</li> <li>• Most documents reviewed around effective safety communication focused exclusively on personnel safety, e.g., driving policy, health protocols.</li> <li>• Interviewees at SoCalGas indicated that employee safety training focuses on personnel safety without the inclusion of public safety.</li> </ul>	<p>Elements 1, 2, and 4 address this Area in Need of Attention.</p>
<p>The absence of Security was noted during multiple field observations at SoCalGas.</p> <ul style="list-style-type: none"> <li>• An installed fence was removed for construction and not replaced.</li> <li>• No security at several visible and accessible site entrances that had exposed pipes.</li> <li>• Aliso Canyon is now getting additional and updated security cameras.</li> </ul>	<p>Elements 1, 2, and 4 address this Area in Need of Attention.</p>
<p>Interviewees indicated that while the Emergency Operations Center and Security Management meet, they do not talk about threats that could potentially impact both areas at the same time.</p>	<p>Elements 1, 2, and 4 address this Area in Need of Attention.</p>

<p>Some management interviewees at SoCalGas indicated that they believe they are enhancing safety culture by training 5000 employees, showing videos with Executive Managers and members of the Leadership Team, having the SMS Plan, and conducting some interviews and focus groups. Safety Culture Perception Survey results, however, indicated that significant differences still exist between managers and directors and frontline employees at SoCalGas on their perceptions around safety. Managers and Directors had significantly more positive perceptions of safety overall than frontline employees.</p>	<p>Element 1 addresses this Area in Need of Attention.</p>
<p>SoCalGas does not use an integrated and systematic process for evaluating and implementing change so that all aspects of safety are considered. The following bullets detail this issue.</p> <ul style="list-style-type: none"> <li>• Individuals representing changes in standards, processes and leadership work independently without assessing the overall strategic impact of the changes occurring in their area to the other areas. (D1,8)</li> <li>• Change management is related to business units more than safety with no systematic risk assessment of change (SPD-03, Appendix D).</li> <li>• While SoCalGas recently positioned the Chief Safety Officer as a direct report to the CEO of the company, the reason for the change has not been clearly communicated or understood even by those in leadership positions.</li> <li>• Interviewees indicated that if organizational changes did not directly impact your group, then leadership would get a quick call before the general announcement; if the group was directly impacted by the change, then a call with leadership and their direct reports would be made to go over the details of the change.</li> <li>• Interviewees perceive that most “management of change” is around changing standards.</li> <li>• Interviewees expressed the opinion that SoCalGas tries to comply with CPUC through changing policies without the appropriate change management strategy.</li> <li>• Interviewees describe change management occurring by email without any explanations.</li> </ul>	<p>Element 4 actions address this Area in Need of Attention.</p>

<p>Leaders at SoCalGas are not consistently observing, coaching or reinforcing standards and expectations.</p> <ul style="list-style-type: none"> <li>• Supervisors in the field did not take notes or actions on issues related to inconsistent use of personal protective equipment, foreign material in excavation sites, incorrect information from databases required for mapping, work activities.</li> <li>• Interviewees describe an unhealthy mindset for safety in the field, ‘if don’t feel like wearing PPE (personal protective equipment), don’t’; it’s not about safety but about rules that they don’t have to follow; there is a lack of integrity.</li> <li>• The lowest scores on the survey questions for Sempra respondents around leadership were about management being in the field. (D1,8)</li> <li>• Some SoCalGas interviewees indicated that managers do not have time to come out to the field and those that do often do not have the right PPE.</li> <li>• SoCalGas interviewees described leaders talking about safety, but that they don’t take action to replace old equipment or provide better equipment.</li> <li>• Some interviewees at SoCalGas perceive feeling some tension between working perfectly to standards and pushing through work orders. They describe a lot of time pressure to get tasks done, e.g. customer service, call center, sometimes without being able to complete the job as prescribed in the standards.</li> </ul>	<p>Elements 1 and 2 address this Area in Need of Attention.</p>
<p>Some interviewees questioned whether recommendations and feedback from both Sempra and SoCalGas’ corporate governance, review boards, and independent oversight organizations override Senior Management’s ultimate responsibility for decisions that affect safety.</p> <ul style="list-style-type: none"> <li>• Observations of SoCalGas Senior Management meetings indicated confusion with the governance model by Sempra. Some SoCalGas Board items must first go to the Sempra Board for review, but not for formal approval. Dialogue around these items is not formalized and then the items are returned to the SoCalGas Board. These items include, policy, dollar level authorizations, control structure, regulatory findings, work order summary sheet (monthly commitment) (D1,8,9).</li> <li>• Some interviewees believe that the SoCalGas Board is strongly influenced by Sempra because of the significant participation by Sempra officers. (D2,3)</li> </ul>	<p>Elements 1 and 4 address this Area in Need of Attention.</p>

Survey respondents in SoCalGas’s Construction, Distribution, Planning & Project Management, Gas System Integrity & Programs, and Gas Transmission Ops groups had the lowest response rates (52 - 59%).	Element 1, 2, 3, 4, and the ongoing dialogues address this Area in Need of Attention.
Nearly a third of all SoCalGas survey respondents do not perceive that employees are recognized for safety conscious behaviors.	Element 1 addresses this Area in Need of Attention.
Approximately 20% of SoCalGas survey respondents indicated that they are sometimes cynical about safety.	Element 1 addresses this Area in Need of Attention.
Interviewees expressed the perception that a double standard exists around accountability in SoCalGas. Some interviewees reported that if a manager makes a mistake, they are moved, sometimes up in the organization or they are fired and then they are asked back a couple years later. If a non-supervisor makes a mistake, sometimes because they were following the verbal instruction of their supervisor, they get blamed for not following policy and disciplined.	Elements 1 and 2 addresses this Area in Need of Attention.
Several interviewees at SoCalGas indicated that there is no accountability, ‘I can do wrong and there is no consequence’.	Element 1, 2, and 4 address this Area in Need of Attention.
Several interviewees at SoCalGas when asked who owns safety, responded Leadership and the Chief Safety Officer.	Elements 1, 2, and 4 address this Area in Need of Attention.
Interviewees at SoCalGas indicated that although all policy changes must be reviewed by each individual and acknowledged online to ensure accountability; in the past individuals used to have meetings with supervision to go over the changes and have an opportunity to ask questions.	Elements 1 and 2 addresses this Area in Need of Attention.

Interviewees at SoCalGas indicated that employees are disciplined for not following company policies, but this is inconsistently implemented. Supplemental personnel (contractors) do not always understand, and/or practice expected behaviors and actions.

- SoCalGas respondents to the Safety Perception Culture Survey had some of the lowest scores on the question of contractors being held accountable.
- Survey comments indicated the perception that contractors are not held to the same standards as SoCalGas employees.
- Contractors had a very low response rate to the Safety Culture Perception Survey even though they had been requested to complete it.
- Observations identified inconsistent use of PPE by contractors in the field.
- Questions raised about contractors using a different system for reporting non-compliances.
- Interviewees indicated that some 3rd party inspectors overlook actions that do not comply with SoCalGas standards.
- Interviewees described little to no contractor oversight and perceive this is because it is less of a direct liability for the company.

Elements 1, 2, and 4 address this Area in Need of Attention.

<p>Observations and interviewees at SoCalGas indicated that a consistent, systematic approach to decision-making where risk insights are incorporated as appropriate is frequently not implemented. Following are examples.</p> <ul style="list-style-type: none"> <li>• Judgments are frequently required in the tasks of personnel in the field and yet not acknowledged by supervision as such, e.g., on a locate and mark work order, two homeowners were not at home and an electric current could not be attached to enable indications. The technician decided that given the ‘normal’ way pipes were installed, the pipe was ‘probably’ outside the dig area and therefore he decided not to mark it.</li> <li>• Interviewees described a situation in which the policy stated that only certain equipment can be used on a 36-inch pipe, but a ‘solution specific enhancement’ of increasing the pipe fitting was used because some pipeline is older than policy.</li> <li>• Many interviewees that rely on policies indicated that most policies have ‘grey areas’ where judgments are required. Most described depending upon supervisors to help make the decisions but also expressed that with many ‘new and inexperienced supervisors’ they often rely on co-workers or themselves.</li> <li>• Interviews indicated that supervisors and managers underestimate the number of interpretations, judgments, and field relevant knowledge that their field workers report and struggle with.</li> <li>• Interviewees indicated that calls on categorizing leaks are judgment calls.</li> <li>• Interviewees indicated that in analyzing risk they are finding a more cost-effective solution, emphasizing the talk around cost.</li> </ul>	<p>Elements 1 and 2 addresses this Area in Need of Attention.</p>
<p><b><i>Overarching Theme 2 - Safety and risk are perceived as achieved by compliance.</i></b></p>	
<p><b>Area in Need of Attention</b></p>	<p><b>SoCalGas Action</b></p>
<p>The consistent focus by interviewees in SoCalGas and Sempra on the very positive perceptions and actions around personnel safety while attributing the job of risk assessment to someone else’s job contributes to the lack of a questioning attitude.</p>	<p>Elements 1 and 2 addresses this Area in Need of Attention.</p>



<p>Interviewees across various locations in SoCalGas expressed concerns that some leadership has accepted the smell of gas as normal.</p>	<p>Elements 1 and 2 addresses this Area in Need of Attention.</p>
<p>During a tour of Aliso Canyon, it was pointed out that the water supplies along the road leading up to the well were not marked. The organization had not anticipated and questioned the importance of being able to access the water supply during an event.</p>	<p>Elements 1 and 2 addresses this Area in Need of Attention.</p>
<p>Interviewees at SoCalGas indicated that when standards change, each group, i.e., training group, evaluates change for its program. However, individuals were not aware how or who was questioning the impact of the changes for the entire organization, e.g., management of change process.</p>	<p>Elements 2 and 4 address this Area in Need of Attention.</p>
<p>Some interviewees indicated that SoCalGas has a long history of a compliance mindset versus a competence mindset.</p>	<p>Elements 1 and 2 addresses this Area in Need of Attention.</p>
<p>Both SoCalGas and Sempra Safety Culture Perception Survey respondents had lower positive responses to the statement about the extent to which questioning management decisions is encouraged compared to other questions on the survey. This is consistent with SoCalGas responses to the survey questions identified in the trait labeled Environment for Raising Concerns.</p>	<p>Elements 1 and 2 addresses this Area in Need of Attention.</p>

<p>Some SoCalGas interviewees indicated feeling inhibited to raise safety concerns because of fear of embarrassment or harassment by supervision.</p> <ul style="list-style-type: none"> <li>• Interviewees identified that some supervision does not want them to report fatigue; if reported the supervisor comes to the job site to drive the individual back to the base often perceived as embarrassing but then lets the worker drive home alone.</li> <li>• Some individuals do not perceive that they can ask questions which might reveal what they don't know, e.g., about policies; it would create a negative perception about them among their supervision.</li> <li>• Interviewees indicated that they perceive they cannot use Stop the Job in the Call Center.</li> <li>• Several interviewees at different locations indicated that they perceive pressure not to report injuries and would not feel 'safe' doing so.</li> <li>• Interviewees indicated that an open dialogue with the upper management is missing.</li> </ul>	<p>Element 1 and 2 address this area in need of attention.</p>
<p>The lowest overall score on the Safety Culture Perception Survey for SoCalGas respondents was in response to the statement that individuals have the ability to openly challenge decisions by management. Only 55% of all respondents agreed with the statement.</p>	<p>Element 1 and 2 address this area in need of attention.</p>

<p>Observations indicated several examples where SoCalGas leaders did not monitor for behaviors that can have a negative impact on the work environment and address them promptly.</p> <ul style="list-style-type: none"> <li>• Inconsistent use of PPE even in training areas, e.g., instructor working with bore without safety gloves, goggles not worn by those working next to welders in shop, observers had to request hearing protection in area where there was jack hammering, use of hand saw without safety gloves.</li> <li>• Individuals working excessive overtime in safety sensitive positions, e.g., safety field representatives.</li> <li>• During unannounced observation facilities were identified that were not conducive to a safe environment and housekeeping was not maintained</li> </ul>	<p>Element 1 addresses this area in need of attention.</p>
<p>While SoCalGas interviewees indicated that they are told to voice concerns, provide suggestions, and raise questions, they also indicated that they were intimidated to do so, e.g. would not stop a whole job, but perhaps just a task because they felt they had to protect the company over themselves.</p>	<p>Element 1 and Element 2 address this Area in Need of Attention.</p>
<p>SoCalGas interviewees indicated that trust is not fostered among many individuals and work groups across the organization.</p> <ul style="list-style-type: none"> <li>• There is a perception of a blame culture among many individuals and behaviors are generally driven by trying to deflect responsibility, e.g., lack of trust in new supervisors to make the right decisions and employees are hesitant to make them for fear of being blamed if something goes wrong.</li> <li>• The use of Behavioral Based Safety (BBS) is focused on working with individuals who are perceived to be a risk and may create blind spots for the organization; the blame becomes assigned to an individual.</li> <li>• Employees describe documenting verbal instructions given by supervisors who can override a policy to protect themselves if the decision is incorrect and the supervisor denies giving the instruction.</li> <li>• Management interviewees indicated a desire to take the blame and discipline out of the equation when an event occurred to get to the root cause. This is in direct contrast to the perception of employees as to what happens.</li> </ul>	<p>Element 1 and Element 2 address this Area in Need of Attention.</p>

<p>Interviewees at all organizational levels in SoCalGas recognize the existence of silos and the need to build better collaboration and interaction between groups. Interviewees also described a lack of trust of SoCalGas on the part of the public and a poor understanding of the importance of gas in the energy mix</p>	<p>Elements 1, 2, and 4 address this Area in Need of Attention.</p>
<p>SoCalGas respondents to the survey also indicated lower perceptions around the trust between management and staff and between work groups.</p>	<p>Elements 1 and 2 address this area in need of attention.</p>
<p>SoCalGas respondents from 9 of the different locations identified scored lower on their overall perceptions around safety on more than half of the dimensions assessed. These locations included Aliso Canyon, Aliso Viejo, Fontana, Glendale, Monterey Park, Palm Desert, Pico Rivera, Redondo Beach (182nd St. Base) and Visalia.</p>	<p>Elements 1 and 4 address this area in need of attention.</p>
<p>Aliso Canyon respondents to the Safety Culture Perception Survey scored lower on all of the 10 dimensions assessed. Respondents from Honor Rancho actually had the lowest scores on all of the dimensions.</p>	<p>Elements 1 and 4 address this area in need of attention.</p>
<p>Survey respondents from both above ground and below ground storage facilities and respondents identified from gas transmission had overall lower perceptions than other groups around the dimensions of safety.</p>	<p>Elements 1 and 4 address this area in need of attention.</p>

***Overarching Theme 3 – Resources are needed to promote a healthy safety culture.***

**Area in Need of Attention**

SoCalGas interviewees indicated that SoCalGas Management is all about budget and that each year the instructions are given to do more with less, 3% less each year to meet the Incentive Compensation Plan (ICP) budget.

- Perception that there are two cultures, what management says and what management does.
- There is the belief that there is a real disconnect between management making the decisions and the people having to do the work. Results from the Safety Culture Perception Survey indicated consistent differences between manager and director perceptions with frontline workers (the closer you get to managing the hazards the less positive the perceptions).
- Many interviewees expressed the opinion that money goes to capital expenditures more than to O & M costs, like safety. Capital expenditures are more often described as related to risk, again reflecting the perception that safety is more narrowly defined.
- Interviewees indicated that the more management saves on budget, the better their bonus.
- Some interviewees indicated that since safety is part of performance appraisal, managers don't want close calls reported unless it is done anonymously.
- Interviewees described attempts at cost saving in emergency response. The Automated Roster Callout System, ARCOS, was frequently reported as slowing response time and not getting appropriately trained personnel on site. Interviewees tended to support more at station or on-call staffing for emergency response.

**SoCalGas Action**

Elements 1, 2, 3, and 4 address this Area in Need of Attention.

The perception of many SoCalGas interviewees is that management does not ensure that staffing levels are consistent with the demands related to maintaining safety and reliability.

- Documentation indicates that staffing levels in risk assessment areas are low.
- About 33% of SoCalGas Safety Culture Perception Survey respondents did not agree with the statement that staffing levels in the company reflect safety as a priority.
- The issue of staffing was identified most frequently by survey respondents who provided comments.
- Interviewees at some bases indicate that they have only one employee working alone on tasks that typically would require a buddy system.
- Interviewees indicated that overtime is often used to overcome staff shortages and has created a fatigue issue among many SoCalGas employees.
- The reliance on contractors (60% versus 40% SoCalGas) is also perceived by SoCalGas interviewees as a way to save costs by reduced staffing levels especially when used for capital construction work.
- Interviewees indicated the belief that everything that can be, is initially capitalized in order to get a return on investment. This does not put more money into O&M budgets that are directly related to safety.
- Many groups across multiple bases expressed staffing level issues.
- Interviewees expressed the idea that even though positions are open, they are not filled until the end of the fiscal year so that the money can be used for other things.
- Interviewees also indicated that the time to replace open positions is a long process with posting, selection, and then training taking sometimes as much as a year.
- Interviewees indicated that scheduling does not work well because they are short staffed; the lack of coordination between Planners and Distribution then creates a domino effect on work planning.
- The on-call requirements vary from base to base, in some they are voluntary, others they are part of the job, and in others it becomes mandatory overtime.

Elements 1, 2, and 3 address this Area in Need of Attention.

<p>Interviewees at SoCalGas indicated that multiple departments are doing the same work with different processes because of silos between groups and differential access to programs; The Pipeline Safety Enhancement Plan PSEP is helping to address the problem by creating a uniform platform for these different programs but has still not been well integrated across the SoCalGas organization.</p>	<p>Element 4 addresses this Area in Need of Attention.</p>
<p>SoCalGas interviewees reported that sometimes tools, equipment, procedures and other resource materials are not available to support successful work performance.</p> <ul style="list-style-type: none"> <li>• Interviewees indicate that many bases have older equipment that decreases the efficiency and reliability of their work, e.g., meter leak testing takes double the time because of old equipment.</li> <li>• Interviewees across the organization describe outdated and slow Information Technology systems. Respondents on the Safety Culture Perception Survey also identified this as one of the most frequent comments.</li> <li>• Interviewees at bases indicated that many of their vehicles are old and in poor condition, creating not only work issues, but perceived safety issues for personnel</li> </ul>	<p>Elements 1, 2, and 3 addresses this Area in Need of Attention.</p>

SoCalGas does always create and maintain complete, accurate and up-to-date documentation.

- Documentation from inspections by SED of the CPUC found violations with documentation and updates to procedures (Q5.3 Attach. 46-50/26-29, Appendix D).
- Documents also indicated that emergency evacuation plans were missing at several compressor stations (Q5.3 Attach. 20, Appendix D). (D5)
- At the time of review in this assessment, the Operations Standard for the investigation of accidents and pipeline failures, e.g., reportables, piping failures detrimental to safety, accidents/failures considered significant by local operating organizations (Q06.1 Attach. 01, Appendix D) had last been updated almost 5 years ago. (D5,6)
- Interviewees indicated that the criteria for the activation of the Emergency Operations Center while in the standards, is constantly changing and not always recognized by those involved in emergency response. Our observations of the Emergency Operations Center also revealed a lack of clarity among staff.
- Observations indicated no reference to procedures during training simulations.
- Interviewees indicated that inactive gas lines when discovered are not documented for future reference.
- Interviewees described that there are main gas lines without test records and consequently the CPUC requires leak surveys in those areas. (D5)
- Interviewees describe problems with different interpretations of policies between supervisors and technicians.
- Many interviewees expressed that new standards and policies come by email and they miss the meetings that would occur on policy reviews and provide opportunities for a dialogue around the changes.
- Interviewees gave examples of individuals working on the same project using different revisions of the same procedure and thinking they were working on the same one.

Elements 1, 2, and 4 address this Area in Need of Attention.



<ul style="list-style-type: none"> <li>• Observations in the field and interviewees indicated that maps are often not up to date.</li> </ul>	
<p>Some interviewees at SoCalGas indicated that certain work processes do not always include the identification and management of risk commensurate to the work.</p> <ul style="list-style-type: none"> <li>• Interviewees indicated that the criterion for conducting any type of causal analysis related to an incident is subjective and decided by conversation (‘If something happens that we don’t want to happen again then we conduct causal analysis’).</li> <li>• Interviewees indicated that the criteria to conduct any type of Incident Investigation are initially determined by local management.</li> <li>• Interviewees explained that the department or unit that finds an anomaly does their own local assessment, and that it is often not communicated to other supervisors and employees. (D8)</li> <li>• Interviewees indicated that there is no Senior Management review (Corrective Action Review Board) of the causal analysis or the corrective actions to be taken on. Interviewees indicated that there is no centralized Quality Assurance function; different groups have their own function and report to different managers. (D8)</li> <li>• Distribution and parts of transmission are shared services with SDG&amp;E and therefore reporting to two CEOs and two Board of Directors which leaves responsibilities and priorities unclear.</li> </ul>	<p>Elements 2 and 4 address this Area in Need of Attention.</p>
<p>About 10% of the SoCalGas Safety Culture Perception Survey respondents indicated disagreement with how work planning was being conducted and the extent to which time frames for completing work were realistic. Interviewees involved in construction and repair expressed the most frustration.</p>	<p>Element 3 and 4 address this Area in Need of Attention.</p>
<p>Documentation from SoCalGas reviewed did not include information regarding any formal direct processes surrounding public input on safety and environmental issues (Q02.11 Attach.01).</p>	<p>Element 1 and 4 address this Area in Need of Attention.</p>

<p>As previously noted, most communication around safety is regarding personnel safety.</p>	<p>Elements 1 and 4 address this Area in Need of Attention.</p>
<p>Interviewees at SoCalGas indicated that internet and/or cell phone connectivity in the field at some locations is problematic making response time difficult and impacting the review of policies, processes, and procedures.</p>	<p>Elements 2 and 3 addresses this Area in Need of Attention.</p>
<p>Interviewees at SoCalGas indicated that the Vice President level and above are not included on the Incident Management System; Directors can access their monthly data (metrics) themselves. (D3)</p>	<p>Element 4 addresses this Area in Need of Attention.</p>
<p>The free flow of information, openly and candidly, both up and down and across the organization and with external stakeholders is not perceived at all levels of the SoCalGas organization.</p> <ul style="list-style-type: none"> <li>• Interviewees described the need for better communication and collaboration with municipalities and customers, e.g., sharing of maps between utilities, coordinating with building contractors, better public relations with customer base.</li> <li>• Senior management interviewees perceive good upward communication in the organization which they attribute to psychological safety, listening, acting on reports; middle managers indicated a lack of dialogue with upper management, and few interviewees in lower levels of the organization knew anything about this assessment.</li> <li>• Many interviewees in lower levels of the SoCalGas organization did not know about SMS or recognize the placard that had been distributed.</li> <li>• While town halls were described by interviewees as a positive mechanism of communication, they also indicated that they could not fix local problems, and that meetings at their level would be better. (D8)</li> <li>• Interviewees describe a need for better and clearer communication between groups so as not to create issues in work, e.g., job was thought to be an extension of a main line but was really a service job.</li> <li>• Interviewees described a competitive atmosphere between departments (silos) that creates barriers to a healthy flow of information.</li> </ul>	<p>Elements 1, 2, and 4 address this Area in Need of Attention.</p>

<p>SoCalGas respondents to the Safety Culture Perception Survey who identified as members of a union were less positive in their responses to questions addressing communication around safety.</p>	<p>Elements 1 and 2 address this Area in Need of Attention.</p>
<p>Many SoCalGas respondents to the survey were not aware that contractors are involved in safety discussions.</p>	<p>Elements 1 and 4 address this Area in Need of Attention.</p>

<b><i>Overarching Theme 4 - Learning and safety improvement require an integrated management system.</i></b>	
<b>Area in Need of Attention</b>	<b>SoCalGas Action</b>
SoCalGas respondents to the Safety Culture Perception Survey indicated fewer positive responses to the statement around the development of leadership skills.	Element 1 addresses this Area in Need of Attention
Documents from SoCalGas safety culture surveys conducted in 2013, 2016 and 2018 consistently indicated poor perceptions regarding lockout/tagout procedures and safety committee effectiveness. An effective organizational response was not identified.	Elements 1 and 2 addresses this Area in Need of Attention.
Metrics presented for the SoCalGas dashboard were compartmentalized into System, Safety and Operations without any integrated or systemic parameters which could facilitate more proactive responses to the data. Observations of an emergency exercise indicated a lack of self-criticality in the ‘hot wash’ (debriefing) of the activity. (D9)	Elements 1, 2, and 4 address this Area in Need of Attention.
Interviewees indicated that after the Aliso Canyon event when everything was stopped irregularities occurred with the infrastructure that continue to date and necessitate additional work as a result.	Element 2 addresses this Area in Need of Attention.
Many interviewees when asked what lessons were learned from the Aliso Canyon event express the opinion that the most important learning was the importance of better communication with the public to avoid poor public relations. (D4)	Elements 1, 2, and 4 address this Area in Need of Attention.
<p>Many interviewees at SoCalGas indicated that the organization has not developed and effectively implemented knowledge transfer and knowledge retention strategies.</p> <ul style="list-style-type: none"> <li>• Interviewees perceive that the lack of a knowledge transfer process is a risk to the company.</li> <li>• Interviewees indicated that knowledge transfer is not documented.</li> <li>• Interviewees indicated that some individuals get hired without experience, don’t always get training, and then get promoted.</li> </ul>	Elements 1, 2, 3, and 4 address this Area in Need of Attention.

<p>Respondents from SoCalGas to the Safety Culture Survey indicated frequently in their comments that an effective knowledge transfer process was needed.</p>	<p>Elements 1, 2, 3, and 4 address this Area in Need of Attention.</p>
<p>Interviewees at SoCalGas that the two areas with very specific qualifications that have been the hardest to find contractors in are gas storage and pipeline construction.</p>	<p>Elements 3 and 4 address this Area in Need of Attention.</p>
<p>Interviewees at SoCalGas indicated that they do not believe they are getting all the training experience needed to learn; a lot is on-line and self-study and sometimes not sure if you are really trained for the job; desire for more training instead of learning by making mistakes in the field.</p>	<p>Elements 1, 3, and 4 address this Area in Need of Attention.</p>
<p>Many interviewees expressed the opinion that SoCalGas is a reactive organization. (D5,6)</p> <ul style="list-style-type: none"> <li>• Interviewees described the belief that things only change after something has happened.</li> <li>• Interviewees expressed the need to get more information on close calls since often they don't get it in a timely manner because of investigations.</li> </ul>	<p>Elements 1 and 2 address this Area in Need of Attention.</p>

<p>SoCalGas has not implemented a program with a low threshold for identifying issues from within its own organization.</p> <ul style="list-style-type: none"> <li>• Documents identify a valve that was inoperable for a year (5478-5481 Q.05.3) when CPUC was forced to inspect, and the corrective actions were driven by CPUC not SoCalGas. (D5)</li> <li>• Documents reveal multiple CPUC inspections where the corrective actions were externally driven, e.g., upgrade procedure to be consistent with exposed pipe regulation; went from SED to SoCalGas and then back to SED to accept. (D5)</li> <li>• Valve inspections not done as required by schedule because of failure by SoCalGas to submit ‘a compliance work order’; when identified by CPUC, immediately done, and then accepted by SED (Q5.3 – Series of attachments). (D5)</li> <li>• Interviewees indicated that a lot of work is driven by the CPUC, e.g., the annual review of policies was ordered by the CPUC, locate and marks, replacements.</li> <li>• Executive Managers indicated that SoCalGas near miss reporting could be better.</li> </ul>	<p>Elements 1 and 2 address this Area in Need of Attention.</p>
<p>Senior Managers indicated that SoCalGas employees fill out a form when an event occurs; most frontline employees indicated that they call their supervisor to fill out the form.</p>	<p>Elements 1 and 2 address this Area in Need of Attention.</p>
<p>SoCalGas Interviewees indicated that suggestions for improvements take too long to get a response, or they do not receive a clear response.</p>	<p>Element 2 addresses this Area in Need of Attention.</p>
<p>SoCalGas respondents to the Safety Culture Perception Survey who identified as members of a union had a less positive perception of problem identification and resolution than respondents who identified as non-union members.</p>	<p>Elements 1 and 2 address this Area in Need of Attention.</p>
<p>SoCalGas respondents who identified as working at Aliso Canyon had a significantly lower average score on problem identification and resolution than the overall average SoCalGas score.</p>	<p>Elements 1 and 2 address this Area in Need of Attention.</p>