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Independent Safety Culture Assessment of SoCalGas and Sempra Energy

A Report by 2EC

EVOLVING ENERGY CONSORTIUM

Independent Safety Culture Assessment of SoCalGas and Sempra Energy

Prepared for

California Public Utilities Commission

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1 Executive Summary

On June 27, 2019, the California Public Utilities Commission (CPUC or Commission) opened an investigation to determine whether Southern California Gas Company (SoCalGas) and Sempra Energy's organizational culture and governance prioritize safety and adequately direct resources to promote accountability and achieve safety goals and standards (I.19-06-014 Order Instituting Investigation on the Commission's Own Motion to Determine Whether Southern California Gas Company's and Sempra Energy's Organizational Culture and Governance Prioritize Safety (U904G) (Safety Culture Investigation or OII)). The Commission, during the first phase of this proceeding, directed the Commission's Safety and Enforcement Division (SED, later succeeded by the Safety Policy Division (SPD)), to investigate, and produce a consultant's report that evaluates SoCalGas' organizational culture, governance, policies, practices, and accountability metrics in relation to its record of operations, including its record of safety incidents, and to produce a report on the issues and questions contained in this order. Evolving Energy Consortium (2EC) was selected to perform the assessment. The review began in early 2020 and extended through much of 2021.

The Focus on Safety Culture

The assessment focused on safety culture. Safety culture is defined as the shared values, attitudes, beliefs, perceptions, and behavioural norms related to risk and safety. This is consistent with the organizational culture definition the CPUC described in I.19-06-014.

"An organization's culture is the collective set of that organization's values, principles, beliefs, and norms, which are manifested in the planning, behaviors, and actions of all individuals leading and associated with the organization, and where the effectiveness of the culture is judged and measured by the organization's performance and results in the world (reality)".[1]

The assessment of safety culture, thus, requires understanding the values, principles, beliefs, perceptions, and often unspoken norms that are manifest in, and are in fact the invisible drivers of, the individual choices and behaviors and the collective decisions of the organization. Organizational members enact these basic elements most often without thought and reflection. This means that cultural facts collected in the assessment of safety culture consist of perceptions, beliefs and values. Assessments that stay at the surface level of behaviors and rules do not improve the culture and can increase risk, by creating an illusion of increased safety. Safety culture improvement requires deep reflection and understanding of the

[1] I.19-06-014

underlying factors that drive actions as understood from the cultural facts. Conducting safety culture assessments are a good proactive practice.

The nature of safety culture means that an assessment is different from other forms of safety assessment, such as a safety management audit. The key difference being that safety audits assess compliance with a predefined standard and determine compliance/ noncompliance with these standards. A comprehensive safety culture assessment collects facts that describe the shared values, beliefs, perceptions, norms and assumptions about safety. While primarily qualitative data is collected in a cultural assessment, it is used to identify how these values, beliefs, perceptions and norms support or undermine safety when compared to an established set of traits used to describe a healthy safety culture. Safety audits capture the 'how of safety', while safety culture assessments describe the "why".

The recommendations arising out of a comprehensive safety culture assessment differ from those from other safety assessments. Safety culture improvement recommendations tend to be broad based and focus on approach rather than a specific tool or activity. While tools can be recommended, they require the engagement and ownership of the organization in order to be effective and sustainable. The greatest benefit of performing a safety culture assessment is to reveal proactively the underlying cultural drivers which may lead to accidents.

The Process of Data Collection and Assessment

The methodology used by 2EC is based on the International Atomic Energy Agency (IAEA)'s approach to assess leadership and culture for safety[2]. The methodology is internationally recognized, scientifically sound and comprehensive. This methodology is also consistent with the American Petroleum Institute (API) Recommended Practice (RP) 1173 Pipeline Safety Management Systems recommendation to adopt a multimethod approach when assessing safety culture.

2EC's process has two unique features that strengthen the quality of the assessment. The first is the descriptive phase to collect the data described below. The intent is to provide detailed descriptions of the perceptions of organizational members, also known as cultural facts, and how they are organized as culture. Second a normative framework is used to evaluate these perceptions and practices in relation to organizational traits shown to impact on safety. The use of two separate phases reduces the risk of subjectivity and the imposing of a normative framework without a detailed understanding of the unique and specific activities and conditions of Sempra and SoCalGas.

To develop a comprehensive description of the safety culture five independent methods are used for the collection of cultural facts: interviews, focus groups, document review, observations and a Safety Culture Perception Survey. Due to COVID the assessment was conducted over an eighteen-month period with some interviews and focus groups conducted virtually.

The 2EC team interacted with over 700 people through 64 interviews, 84 focus groups and 75 observations. This was approximately 10% of the population being assessed. Care was taken to assure these interactions represented all business areas and hierarchical levels of SoCalGas and those Sempra employees who interface with SoCalGas. This was achieved through a random selection process for both the interviews and focus groups. Members of both Sempra's and SoCalGas' Boards were interviewed. The participants in most cases were engaged and openly shared their views.

[2] IAEA publications of the methodology https://www-pub.iaea.org/MTCD/Publications/PDF/SVS-32_web.pdf and STI/PUB/1682 (iaea.org)

Concurrently, a comprehensive document review was completed (see Appendix D) and a safety perception survey was sent to all SoCalGas employees. SoCalGas had a response rate of 85% (6841/8072). The same survey was sent to all Sempra employees who interface with SoCalGas including senior management and board members. Sempra's response rate was 79% (284/359).

The cultural facts collected from all five assessment methods were independently reviewed and analyzed for cultural themes. A cultural theme is a concept or principle that integrates a significant portion of individual perceptions and behaviors and notes an underlying set of values and norms which impact safety. The four themes identified and discussed below describe members' concept of safety, their way of enacting safety, the use of resources in assuring safety, and their processes of learning to continually improve safety. The themes and facts presented in this report were those that were repeatedly collected across the different methods and therefore represent a shared understanding, belief, perception or value in the organization.

The second process was evaluative. The overarching themes and the cultural facts that they describe were analyzed and compared to the U.S. Nuclear Regulatory Commission/Institute of Nuclear Power Operations (USNRC/INPO) normative framework of 10 traits for a healthy safety culture[3]. These traits are:

The USNRC/INPO normative framework of a healthy safety culture

1. Personal Accountability
2. Questioning Attitude
3. Effective Safety Communication
4. Leadership Safety Values and Actions
5. Respectful Work Environment
6. Continuous Learning
7. Problem Identification and Resolution
8. Environment for Raising Concerns
9. Work Processes
10. Decision making

From this comparison the report identifies positive aspects of the company and areas in need of attention as they relate to the attributes of the traits. While the USNRC/INPO normative framework has rarely been used in the gas transmission and distribution business, it has been highly successful in the nuclear industry and has provided guidance for some parts of the American Petroleum Institute (API), particularly the Center for Offshore Safety, as it continues to develop standards on safety culture. Bringing insights from other industries can help the validity of assessments.

This independent safety culture assessment is a snapshot of a period of time. While the team recognizes that recent efforts are being made to address some of the areas identified, the team was not able to evaluate them and therefore they are not included in this report.

Results

As evidenced by the facts, positive aspects of all of the USNRC traits of a healthy safety culture have been identified in this assessment. However, when the facts are compared to the attributes of each trait, areas in need of attention are also clearly evident. It is important to remember that the cultural facts collected represent the reality of the members of the organization through their perceptions, values, beliefs, and understandings and are influencing the organizational behaviors. The positive aspects and the areas in need

[3] https://nuclearsafety.info/wp-content/uploads/2010/07/Traits-of-a-Healthy-Nuclear-Safety-Culture-INPO-12-012-rev.1-Apr2013.pdf

of attention are outlined below and detailed in the report. An analysis of the four overarching cultural themes identified in this assessment, and their impact on safety, is presented in the conclusions section.

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

Safety includes all types of safety, e.g., personnel (occupational, industrial, the physical and mental well-being of employees), process, security, public, environmental. Various documents reviewed, and statements made by management, talk about safety culture as including safety of employees, customers and the public. However, during this assessment employees and managers talked almost exclusively about personnel safety. This indicates that people in the organization understand safety in a very narrow sense. Stated in another way, while the organization may espouse a broad conception of safety culture, that view has not been internalized by most people in the organization.

Further, the perceptions of management around many of the traits for a healthy safety culture are frequently not aligned with the perceptions of those that are working in the field. The disconnect between management and field-based SoCalGas employees on many of the conditions identified in this assessment create barriers to achieving a consistent safety culture. For example, SoCalGas employees in the field express concerns around overtime, fatigue, equipment, emergency response and lack of field experience of supervisors and planners. These perceptions appear to be largely unrecognized by many on the management team and can have significant public safety consequences.

Public safety and security are generally included in conversations about risk, but discussions of safety often do not include discussions of risk types or sources. Following this narrow view, the positive achievements in personnel safety and reward systems can lead to complacency in addressing the larger issues of safety. In terms of the normative traits, the analysis identifies some positive qualities but specific areas of concern exist regarding 1) leaders demonstrating a commitment to public safety, 2) individuals taking personal responsibility for public safety, and 3) decisions prioritizing public safety and security.

***Overarching Theme 2* – Safety and risk are perceived as achieved by compliance.**

Public safety in SoCalGas and Sempra is mostly understood in terms of risk. However, this assessment identified that the approach to risk and risk management, an enterprise risk management framework, is not systemic. To date, the RAMP and integrity management programs at SoCalGas have not been integrated and yet are known to impact each other. Different types of risk often have their own department, e.g., different areas of integrity management. Having a more integrated approach would increase the probability of identifying not only the obvious threats to risk but those that might be exacerbated when combined with others.

Further, the approach to risk is frequently reactive and focused narrowly in terms of compliance. While compliance is a necessary condition for safety it is rarely sufficient. A compliance culture often does not recognize the complexity of field conditions and does not develop proactive measures. This assessment identified that many of the actions taken by SoCalGas and Sempra are compliance driven. Reliance on compliance-based behavior reduces early identification of potential problems and focuses on rule-based behavior. This approach does not lend itself to looking at the complexity of systems.

Discussions regarding safety culture across industries suggest a continuum of organizational development — a compliance phase, a performance phase, and a systemic phase. In the compliance phase the organization is just trying to meet the requirements of the rules and regulations imposed by external

stakeholders. As the organization moves on to the performance phase it is learning to manage safety performance through measurement of process. At the systemic phase, safety becomes a way of doing business and is integrated into all aspects of the organization at the most fundamental levels. In the systemic phase organizations seek to identify internal and external factors that could influence safe performance of work and develop predictive, preventive and compensatory controls for the broad spectrum of risk types[4].

This assessment identified that SoCalGas and Sempra have not yet developed beyond the compliance phase in the maturity of their culture for safety. Changes are needed to move along to the next phases of development. In addition to the concerns raised regarding the conception of safety itself, a comparison to the normative traits suggest that the changes needed are limited by 1) an environment that is not conducive to raising concerns and 2) that the organizations have not developed a robust environment for raising concerns.

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

The allocation of resources including money, people, equipment, and time, is an attribute of leadership. Leaders ensure that personnel, equipment, procedures, and other resources are available and adequate to support safety. This assessment identified through interviewees that there are concerns within SoCalGas about whether safety is prioritized through the allocation of resources. Consistently reported issues around technology, staffing and equipment at SoCalGas, demonstrate short sightedness in the understanding of their impact on safety. In regard to traits in the normative framework, a number of gaps are seen in 1) The process of planning and controlling work activities so that safety is maintained, and 2) effective safety communication.

***Overarching Theme 4* – Learning and safety improvement require an integrated management system.**

An effective integrated management system is a tool that can help an organization connect the dots across all its processes to ensure meeting its goals and desired performance. It transcends group differences and becomes the backbone that ties the organization together regardless of how diverse the products and services may be. This assessment identified through interviewees that SoCalGas does not have an effective integrated management system. Functions that should be centralized are embedded in individual units of the organization e.g., Quality Assurance, Incident Investigations, and until recently Safety. This reflects a mindset that differs from that in a healthy safety culture. These groups should be independent of those that they are evaluating and supporting.

SoCalGas is limited in its ability to work across systems and processes, to understand the way in which collective information can facilitate learning. In terms of the normative framework gaps in attributes of the traits of Continuous Learning — Opportunities to learn about ways to ensure safety are sought out and implemented — and Problem Identification and Resolution — Issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance are most relevant, were identified.

[4] Adapted from the safety culture maturity model developed by Lawrie, M., Parker, D., & Hudson, P. (2006). Investigating employee perceptions of a framework of safety culture maturity. Safety Science, 44(3), 259-276.

Conclusion

This assessment through the collection of cultural facts identified positive observations for SoCalGas and Sempra in each of the traits for a healthy safety culture. The positive and effective response to the COVID-19 situation, the Situation City training complex and the desire to learn and continuously improve from external stakeholders are noteworthy. A cultural change is necessary, however, to maximize the benefit from those observations as well as all of the information collected in this assessment.

In the assessment of Sempra and SoCalGas in relation to the normative traits for a healthy safety culture, areas needing attention were identified and supported with cultural facts from multiple sources of information. Numerous opportunities to improve exist. The Positive Observations discussed similarly provide opportunities to enhance safety culture by building on what is already working.

Overall SoCalGas is highly "siloed." For example, risk and safety are conceptually and functionally separated, and departmental segmentation occurs around types of risks. But even more generally, information sharing, coordination of activities, and learning do not often occur across levels and divisions. While SoCalGas management has described having developed and implemented a safety management system (SMS)it is still only partially implemented and does not appear to be integrated into everyday operations.

While the report contains many more details, a summary here can be given of areas needing attention relative to an adaption of the traits for a healthy safety culture. These include:

Leadership Safety Values and Actions: Leaders clearly espouse the value of safety generally, though mostly emphasizing personnel safety. Reward systems generally use lagging indications of and emphasize personnel safety. They are not perceived by employees to integrate public and security risk into their messages, measurements, or rewards.

Effective Safety Communication: Current safety communication is limited in several ways. Safety is conceptualized narrowly and described by interviewees nearly exclusively about personnel safety. Little of the training, meetings, and messages consider public and security risks. Little upward communication exists to identify field-based experiences at SoCalGas that create potential public risks including things like effects of staffing, supervisor experience, overtime and fatigue, and knowledge transfer.

Decision-Making and Work Processes: Staffing issues were described by interviewees at a number of SoCalGas locations. Concerns were often raised around fatigue, overtime, emergency response systems, replacement of employees, loss of field experience workers and their expertise, the increased use of sub-contractors, and the lack of field experience of supervisors and planners. Some workers reported that they are often not equipped to make the kind of policy and procedure interpretations necessary in complex and unexpected field conditions. This does not lead to a list to be fixed but suggests that the culture that has led to these concerns has not prioritized safety.

Environment for Raising Concerns and Questioning Attitude: Basic principles for a questioning attitude, especially regarding personnel safety exists and is clearly reinforced. People are not punished for raising concerns. But many SoCalGas employees especially working in the field do not feel that they can raise concerns and/or that they will be acted on.

Continuous Learning and Problem Identification and Resolution: The lack of adequate knowledge capture and transfer processes came up often in the interviews at SoCalGas. Part of this appears to arise from the silos where learning is not shared across levels and divisions. But it comes also in the employee replacement processes, the lack of adequate reporting and analysis of close calls/near misses, and event investigations.

The lack of leading indicators makes identification of evolving problems difficult and adds to the reactivity of the compliance mindset.

Personal Accountability: The report details places of where employees shift blame and try to keep from being blamed. Situations at SoCalGas are documented where compliance and rule following existed even when best judgments might suggest other choices.

At a high level, these difficulties build on each other. Without a clear and robust concept of safety, an organization's safety communication suffers; when communication suffers decision making and work processes cannot always be directed toward safe choices; without an environment for raising concerns the problems in choices cannot become visible and discussed; hence problems are not always proactively identified and the organization does not learn; and finally personal accountability becomes weak.

The items above are linked to traits that are essential for a healthy safety culture. They each merit attention, discussion and deliberation. However, attempts to address individual items needing attention by incremental improvement is unlikely to result in substantive or lasting change. Thus, individual items are best addressed in relation to larger cultural forces. The following recommendations focus on these.

Recommendations

The areas needing attention, along with the supporting cultural facts, discussed for each of the Overarching Themes provide numerous opportunities for improvement. Culture change takes time and starts with an understanding of the underlying drivers of organizational behaviors. Sustainable change addresses the underlying assumptions and perceptions that drive the organizational behaviors. Often organizations tend to create corrective actions addressing the visible manifestations of the culture such as behaviors, policies, metrics, and instructions without understanding why these may be important. These types of corrective actions will not be effective as the change will not last for a longer term.

Below is a brief set of general recommendations for Sempra, SoCalGas and CPUC. Details on ways of achieving these are in the report. To be effective the three organizations need to align around a broad conception of safety culture. The organizations might consider a collaborative learning approach as a cost-effective way to work with each other in this area.

Sempra needs to develop policies that support a transition to an enterprise risk management approach that entails a comprehensive perspective of safety. To achieve this, Sempra needs to develop a robust inclusive concept of safety and risk through dialogues with Board Directors and Executives that is facilitated by external and independent experts. From this, Sempra can develop governance processes to support a more comprehensive safety culture at SoCalGas.

SoCalGas needs to transition to an enterprise risk management system that is inclusive of a comprehensive view of safety and aligned with the policies developed by Sempra This will create a change in metrics and the development of leading indicators for SoCalGas. Presently risk management in SoCalGas is fragmented and siloed. The more comprehensive approach to safety and risk should be used to reduce silos around aspects of risk and safety, and to build more reliance on leading rather than lagging indicators. In order to break the silos and to enhance collaboration, coordination and engagement across the organization, both hierarchically and between business units, cross-organizational conversations around the concept of comprehensive safety should be implemented.

The scope of this assessment did not include the CPUC. Through the facts collected from Sempra and SoCalGas, and the history of regulators and their role in significant events across several industries,

recommendations for the CPUC have been formalized to facilitate their supporting and oversight of a healthy safety culture in the Sempra and SoCalGas organizations. The CPUC needs to have a facilitated internal dialogue regarding conceptualizing and evaluating safety. This would include an understanding of how its own culture and practices impacts utilities' culture for safety. Currently, CPUC initiated actions for SoCalGas promoted the utility's reactive, rather than proactive behavior. CPUC also needs to be able to identify the early signs of declining safety culture through its oversight activities. The CPUC inspection and analysis framework should incorporate safety culture indicators and inspectors as well as decision-makers should be trained to observe, detect and analyze potential emerging safety culture concerns.

2 Introduction and background

On June 27, 2019, the California Public Utilities Commission (CPUC or Commission) opened an investigation to determine whether Southern California Gas Company (SoCalGas) and Sempra Energy's (Sempra) organizational culture and governance prioritize safety and adequately direct resources to promote accountability and achieve safety goals and standards (I.19-06-014 Order Instituting Investigation on the Commission's Own Motion to Determine Whether Southern California Gas Company's and Sempra Energy's Organizational Culture and Governance Prioritize Safety (U904G) (Safety Culture Investigation or OII)). The Commission, during the first phase of this proceeding, directed the Commission's Safety and Enforcement Division (SED) to investigate, and produce a consultant's report that evaluates SoCalGas' organizational culture, governance, policies, practices, and accountability metrics in relation to its record of operations, including its record of safety incidents, and to produce a report on the issues and questions contained in this order. Evolving Energy Consortium (2EC) was selected to perform the assessment. The review began in early 2020 and extended through much of 2021.

The scope of the assessment was identified by 2EC to include collecting information through various sources from

- Sempra Board of Directors and Executive Management
- Sempra Corporate units that interface with SoCalGas, including Human Resources, Corporate Tax, Controllers, Physical Security, Cyber/Technology and Audit Services.
- SoCalGas Board of Directors, Executive and Senior Management
- SoCalGas Union Leadership
- Leadership and Staff from all SoCalGas Business Units
- Representation from the majority of the 70 sites and facilities of SoCalGas
- Representation from Tier 1 Level (largest) contractors to SoCalGas

In addition the OII identified 9 discrete questions that were to be addressed as part of the assessment.

2.1 Overview of SoCalGas/Sempra

Originally incorporated in California in 1867 as the Los Angeles Gas Co., that would become Southern California Gas Company (referred to as SoCalGas), SoCalGas is a utility company based in Los Angeles, California. SoCalGas is the primary provider of natural gas to the majority of Southern California.

In 1998 Sempra was formed as the consolidation of Pacific Enterprises with the Enova Corporation, the parent company of San Diego Gas & Co. The entity that resulted from the combined operations of both companies was named Sempra. Today, SoCalGas is a regulated subsidiary of its parent company, Sempra, a San Diego-based, Fortune 500 energy services holding company that was managing over $66 billion in total assets at the end of 2020. Like other investor-owned utilities in the state, SoCalGas' operations are regulated by the California Public Utilities Commission (CPUC). CPUC also regulates San Diego Gas and Electric (SDGE). SoCalGas and SDGE are the only entities in Sempra's portfolio regulated by CPUC.

2.1.1 SoCalGas Organization

2.1.1.1 System Overview

As the nation's largest natural gas distribution utility, SoCalGas provides natural gas service to 21.8 million consumers connected through nearly 5.9 million meters of pipeline in more than 500 communities. The service territory covers about 24,000 square miles, from San Luis Obispo in the north, to the Mexican border in the south. The service territory covers 12 counties, 220 incorporated cities and at least as many unincorporated communities. Included are most of the region's heavily populated areas, with the exception of the city of Long Beach and county of San Diego.

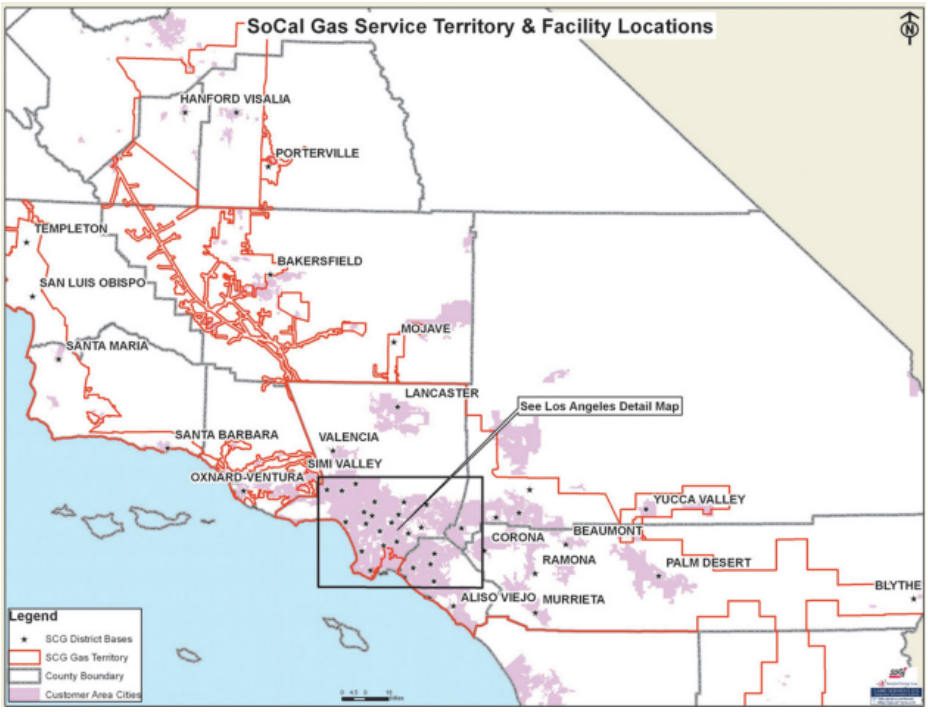

Figure 1: SoCalGas Service Territory

As can be seen in Figure 1, SoCalGas has 80 staffed locations including general offices, bases, multi-use sites, branch offices, and telecommunication sites.

2.1.1.2 Distribution system

SoCalGas owns and operates a sprawling distribution system comprised of approximately 51,400 miles of distribution pipeline and 4.52 million services (~48,888 miles). These assets create a network approximately 100,000 miles of interconnected gas mains, services, and associated pipeline facilities that deliver natural gas to SoCalGas' approximately 5.9 million residential, commercial, and industrial customer customers' meters.

2.1.1.3 Transmission system

SoCalGas owns and operates an integrated gas transmission system consisting of pipelines, compressor stations, and storage facilities. The transmission system extends from the Colorado River on the eastern end of SoCalGas' approximately 24,000 square mile service territory, to the Pacific Coast on the western end;

from Tulare County in the north, to the U.S./Mexico border in the south (excluding parts of San Diego County).

Designed to distribute supply from the fringes of the service territory all the way to primary load centers in Los Angeles and San Diego. SoCalGas owns and operates approximately 3,340 miles of transmission pipeline.

2.1.1.4 Underground Gas Storage system

SoCalGas operates and maintains four natural gas storage fields:

1. Aliso Canyon
2. Honor Ranch
3. La Goleta
4. Playa Del Rey

Total storage capacity is over 130 billion cubic feet of gas. One billion cubic feet is enough to fuel about 5 million U.S. homes for a day. SoCalGas uses these gas storage fields and flowing pipeline supplies to meet customer demand.

2.1.1.5 Other Facilities

SoCalGas also operates additional infrastructure that facilitates the movement, storage, compression, regulation, and distribution of gas. These facilities include eleven transmission compressor stations and many regulator stations.

2.1.1.6 SoCalGas Employees

SoCalGas employs approximately 8400 people. In addition to management functions, these employees provide services including:

- Maintenance and construction of SoCalGas assets
- General construction, typically the replacement or building of new SoCalGas assets
- Operation of control centers for gas transmission and distribution
- Maintenance and restoration of gas service to SoCalGas customers
- Clerical functions related to the maintenance and construction of SoCalGas assets.
- Maintenance and updating of SoCalGas system maps; estimating costs and designing jobs prior to construction; providing engineering expertise; and managing projects throughout the system.
- In addition to its employees, SoCalGas uses a number of contractors and consultants for a variety of work activities at varying levels.

2.1.2 Sempra Energy Organization

SoCalGas' parent holding company, Sempra has multiple subsidiaries in the energy industry that hold and operate facilities around the world.[5] Collectively, these companies serve 36 million customers worldwide via 195,000 miles of electric transmission and distribution lines and employ approximately 19,000 people.

[5] This assessment evaluated only the SoCalGas subsidiary.

Collectively, the Sempra family of companies manages over $66 billion in total assets in the energy industry as of the end of 2020. The company is governed by a Board of Directors that oversees the operations of its subsidiary companies.

2.1.2.1 Sempra Infrastructure

Sempra's infrastructure division develops, builds, and operates energy critical infrastructure. The company operates LNG facilities and development projects on the Pacific and Gulf Coasts of North America. The company operates over 1,500 megawatts of clean energy projects with a development pipeline of 3,000 megawatts of US-Mexico cross-border solar, wind and battery storage projects. The company operates more than 4,500 miles of natural gas transportation and distribution pipelines and also has a refined products terminal network under development and operation. Sempra's major subsidiaries include:

San Diego Gas & Electric Company (SDGE)

SDGE began serving the city of San Diego in 1881. Today, SDGE is much larger, a San Diego-based electric and gas utility that provides energy to its 3.7 million customers in San Diego and southern Orange Counties through its approximately 8200 miles of gas distribution pipeline and 691,000 gas services.

Southern California Gas Company

SoCalGas began delivering natural gas to customers in Los Angeles in 1867. Since then, the company has grown into the nation's largest natural gas distribution utility, providing service to 21.8 million consumers across 24,000 square miles throughout central and southern California.

Oncor Electric Delivery Company

Headquartered in Dallas, Oncor is a regulated electric transmission and distribution service provider, made up of approximately 137,000 miles of lines and 3.6 million advanced meters, making it the largest utility in Texas. More than 4,000 employees work to maintain electric delivery service to over 10 million Texans. Sempra indirectly owns approximately 80% of Oncor.

2.2 Nature of safety culture and assessment

The term safety culture was coined by the International Atomic Energy Agency (IAEA) to describe the preconditions that allowed the Chernobyl nuclear disaster to occur in 1986[6]. Subsequently, safety culture has been used in many other disaster inquiries (e.g., Deep Water Horizon, San Bruno) to explain how the disaster occurred, even though the organization had a full range of engineering and system controls available. Typically, before the disaster occurred, the leadership of these organizations believed they were operating safely, even though the safety weaknesses that caused the disaster were present. These organizations were suffering from cultural blindness, that created a void between how safety was believed to be managed versus actual practices. The independent review panel into the San Bruno explosion reached a similar conclusion.

[6] International Atomic Energy Agency (IAEA). (1986). *"Summary Report on the Post-Accident Review Meeting on the Chernobyl Accident."* Safety Series No 75-INSAG-1, Rep., International Atomic Energy Agency, Vienna.

"It [PG&E] did not make the connection among its high level goals, its enterprise risk management process, and the work that was actually going on in the company. We think this failing is a product of the culture of the company – a culture whose rhetoric does not match its practices." p16[7]

Safety culture is therefore important, as it highlights the need to go beyond technical solutions to minimize the risk of disaster and how culture may make safety weaknesses less visible. The importance of safety culture is recognized by CPUC, as they stated;

"An effective safety culture is a prerequisite to a utility's positive safety performance record." p3[8]

There are numerous definitions of safety culture. Fortunately, these definitions contain many common elements[9]. Definitions of safety culture typically highlight the importance of shared values, attitudes, beliefs, perceptions, and behavioural norms related to risk and safety. This is consistent with the organizational culture definition the CPUC described in I.19-06-014.

"An organization's culture is the collective set of that organization's values, principles, beliefs, and norms, which are manifested in the planning, behaviors, and actions of all individuals leading and associated with the organization, and where the effectiveness of the culture is judged and measured by the organization's performance and results in the world (reality.)" p3[10]

Edgar Schein's three-levels model of organizational culture (Figure 2) is useful to explain the complexity of safety culture. Schein's model of culture consists of artefacts, espoused values and basic assumptions[11]. Artefacts are the most visible manifestation of the culture, and they include physical signs (e.g., buildings, logos, posters, documents, attire), practices and organizational performance (e.g., language, behaviors, teamwork, leadership styles). Cultural artefacts are easy to observe and easy to misinterpret[12]. The same artefacts may have different meanings in different organizations. A notice board that counts the number of days since the last safety incident may reflect the high priority placed on safety, or it could reflect a focus on safety statistics rather than a concern for employee wellbeing p10[13]. Espoused values reflect the stated values of the organizations and are reflected in rules and procedures, stated priorities and employee perceptions. Basic assumptions are often sub-conscious and taken for granted beliefs about the way the world works. The basic assumptions drive the espoused values and artefacts. To change culture, basic assumptions, rather than artefacts or espoused values, must be changed.

[7] Report of the Independent Review Panel – *San Bruno Explosion – Prepared for the California Public Utilities Commission,* June 24, 2011
[8] I.19-06-014
[9] Guldenmund, F. W. (2000). *The nature of safety culture: a review of theory and research.* Safety science, 34(1-3), 215-257.
[10] I.19-06-014
[11] Schein, E. H. (2004). *Organizational culture and leadership* (3rd ed.). San Francisco, CA: Jossey-Bass.
[12] Guldenmund, F.W. (2010). *Understanding and exploring safety culture.* Uitgeverij BOXPress; Oisterwijk.
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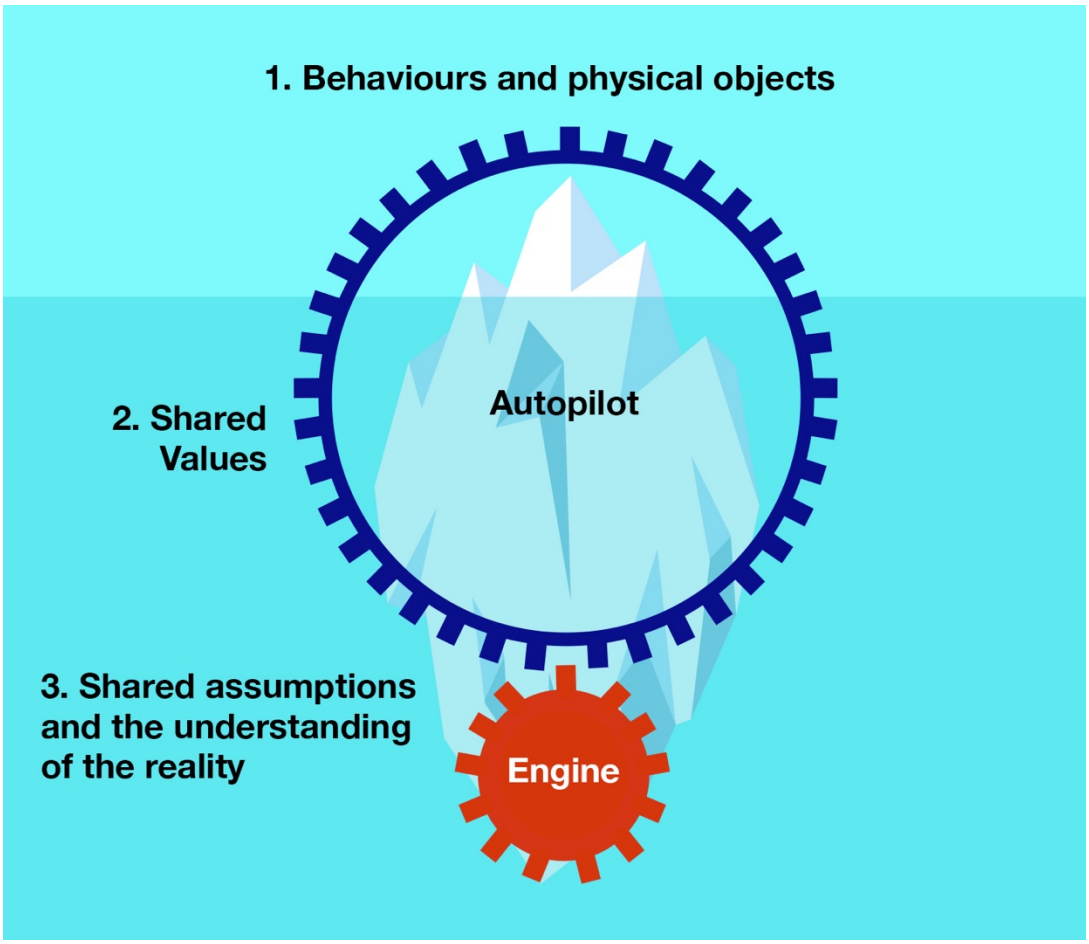


Figure 2: Three levels of culture inspired by Edgar Schein.

The nature of safety culture means that assessment is different from other forms of safety assessment, such as a safety management audit. The key difference being that safety audits assess compliance with a predefined standard and determine compliance/noncompliance with these standards. A comprehensive safety culture assessment describes the shared values, beliefs, perceptions, norms and assumptions about safety. While primarily qualitative data is collected in a cultural assessment, it is used to identify how these values, beliefs, perceptions and norms support or undermine safety when compared to an established set of traits used to describe a healthy safety culture. Safety audits capture the 'how of safety', while safety culture assessments describe the "why".

Safety culture assessments involve gaining insight indirectly through multiple methods, into the culture of an organization. Organizations often assume that observable safety practices (e.g., management worksite visits) are the culture, rather than just a reflection of the culture. This approach does not help to improve the culture and can increase risk, by creating an illusion of having improved safety. Safety culture improvement requires an iterative process of reflection and improvement in understanding what influences safety performance. It is important to remember that the cultural facts collected in the assessment represent the reality of the members of the organization through their perceptions, values, beliefs, and understandings.

The differences between safety culture assessment and a management audit can be illustrated with the following example. A safety audit may identify that an organization's incident investigation process does not conform to the predefined standard, as underlying causal factors are not adequately identified. This

deficiency could be addressed by the organization by implementing a new incident investigation process that included a process for identifying underlying causes. While it may be useful to implement such as system, if cultural factors are not considered in the process for identifying causes, the system is unlikely to improve learning from incidents. A safety culture assessment of the same organization might reveal the shared belief that incidents are due to a lack of motivation and personal responsibility and that other contributing factors are just excuses to avoid taking responsibility for actions. These shared values would be reflected in the results of incident investigations as well as other areas. The cultural assessment would recommend addressing the shared cultural beliefs and assumptions around incident causation and not recommend the adoption of a specific incident investigation approach.

The majority of safety culture frameworks are normative models, as they are intended to describe the attributes of a healthy safety culture. These normative models can be used by stakeholders to describe what good looks like and to identify improvement opportunities from the safety culture assessment results. Although there is no one accepted model, that does not mean all models are equal. Some safety culture frameworks, such as the USNRC safety culture framework, have withstood public and professional scrutiny, while others are based on expert opinion.

The recommendations arising out of a comprehensive safety culture assessment differ from those from other safety assessments. Safety culture improvement recommendations tend to be broad based and focus on approach rather than a specific tool or activity. This means that linear corrective actions (information campaigns, changes in procedures, metrics, behavioral change programs) will not resolve underlying weaknesses in beliefs, perceptions, and assumptions that drive organizational behavior. Therefore, a change in the understanding is the first step for cultural change.

One of the most significant benefits of performing a safety culture assessment is to proactively identify the underlying cultural drivers that through their influence on performance may lead to accidents. This means that cultural facts such as perceptions are important to identify proactively. As mentioned earlier, most disasters have elements of cultural blindness as strong contributing factors. Conducting safety culture assessments are a good proactive practice.

"There are numerous definitions of safety culture. Fortunately, these definitions contain many common elements. Definitions of safety culture typically highlight the importance of shared values, attitudes, beliefs, perceptions, and behavioural norms related to risk and safety."

3 Description of the methodology and process

The methodology used by 2EC is based on the International Atomic Energy Agency (IAEA)'s approach to assess leadership and culture for safety[14]. The methodology is internationally recognized, scientifically sound and comprehensive. This methodology is also consistent with the American Petroleum Institute (API) Recommended Practice (RP) 1173 Pipeline Safety Management Systems recommendation to adopt a multimethod approach when assessing safety culture.

2EC's process has two unique features that strengthen the quality of the assessment. The first is the descriptive phase to collect data described below. The intent is to provide detailed descriptions of the perceptions of organizational members, cultural facts, and how they are organized as culture. Second a normative framework is used to evaluate these perceptions and practices in relation to organizational traits shown to impact on safety. The use of two separate phases reduces the risk of subjectivity and the imposing of a normative framework without a detailed understanding of the unique and specific activities and conditions of Sempra and SoCalGas. To develop a comprehensive description of the safety culture five independent methods were used for the collection of information:

- **Interviews**
- **Focus groups**
- **Safety Culture Perception Survey**
- **Document review**
- **Observations**

Due to COVID the assessment was conducted over an eighteen-month period with some interviews and focus groups conducted virtually.

3.1 Description of the assessment process

3.1.1 Preparation and familiarization

The 2EC team prepared for the assessment by familiarizing itself with SoCalGas and Sempra. The familiarization included senior management meetings with SoCalGas, Sempra, and with the CPUC. The objective was to present the 2EC team, the methodology, and the intended outcome of the assessment. The participation level in both SoCalGas and Sempra meetings was very high, and an open dialogue was fostered. Both CEOs committed to communicate to their organizations the importance of the assessment and encourage the interviewees to be open and transparent with their views. The promise was kept which facilitated the assessment.

3.1.2 Data gathering

The 2EC team interacted with over 700 people through 64 interviews, 84 focus groups and 75 observations. This was approximately 10% of the population being assessed. Care was taken to assure these interactions represented all business areas and hierarchical levels of SoCalGas and a sampling of areas at Sempra that interface with SoCalGas. This was achieved through a random selection process for both the interviews and

[14] IAEA publications of the methodology https://www-pub.iaea.org/MTCD/Publications/PDF/SVS-32_web.pdf and STI/PUB/1682 (iaea.org)

focus groups. Members of both Sempra's and SoCalGas Boards were interviewed. The participants in most cases were engaged and openly shared their views.

Concurrently a comprehensive document review was completed (see appendix D) and a safety perception survey was sent to all SoCalGas employees. SoCalGas had a response rate of 85% (6841/8072). The same survey was sent to all Sempra employees who interface with SoCalGas including senior management and board members. Sempra's response rate was 79% (284/359). An effort by 2EC and SoCalGas was made to survey SoCalGas contractors but did not succeed. SoCalGas identified companies that provided individuals that have worked at SoCalGas sites for greater than one year periods. Contractors reported distributing 1160 electronic or paper surveys to their employees, but only 444 usable surveys were returned. Two hundred completed surveys were excluded as they did not pass the attention check items[15].

The cultural facts collected from all five assessment methods were independently reviewed and analyzed for cultural themes. A cultural theme is a concept or principle that integrates a significant portion of individual perceptions and behaviors and notes an underlying set of values and norms which impact safety. The four themes identified and discussed below describe members' concept of safety, their way of enacting safety, the use of resources in assuring safety, and their processes of learning to continually improve safety. The themes and facts presented in this report were those that were repeatedly collected across the different methods and therefore represent a shared understanding, belief, perception or value in the organization.

The second process was evaluative. The overarching themes and the facts that they describe were analyzed and compared to the U.S. Nuclear Regulatory Commission/Institute of Nuclear Power Operations (USNRC/INPO) normative framework of 10 traits for a healthy safety culture[16]. These traits are:

1. **Leadership Safety Values and Actions –** Leaders demonstrate a commitment to safety in their decisions and behavior.
2. **Personal Accountability** - All individuals take personal responsibility for safety.
3. **Decision-Making** - Decisions that support or affect safety are systematic, rigorous, and thorough.
4. **Questioning Attitude** – Individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action.
5. **Environment for Raising Concerns** – A safety conscious work environment (SCWE) is maintained where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination.
6. **Respectful Work Environment** – Trust and respect permeate the organization.
7. **Work Processes** – The process of planning and controlling work activities is implemented so that safety is maintained.
8. **Effective Safety Communication** – Communications maintain a focus on safety.
9. **Organizational Learning** – Opportunities to learn about ways to ensure safety are sought out and implemented.
10. **Problem Identification and Resolution** – Issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.

[15] The survey included 3 items to check that participants were paying attention to the survey e.g. I am responding without reading the items. If participants agreed with these items they were excluded from further analysis.
[16] https://nuclearsafety.info/wp-content/uploads/2010/07/Traits-of-a-Healthy-Nuclear-Safety-Culture-INPO-12-012-rev.1-Apr2013.pdf

From this comparison the report identifies positive aspects of the organizations and areas in need of attention as they relate to the attributes of the traits. While the USNRC/INPO normative framework has rarely been used in the gas transmission and distribution business, it has been highly successful in the nuclear industry and has provided guidance for some parts of the American Petroleum Institute (API), particularly the Center for Offshore Safety, as it continues to develop standards on safety culture. Bringing insights from other industries can help the validity of assessments.

This independent safety culture assessment is a snapshot of a period of time. While the team recognizes that recent efforts are being made to address some of the areas identified, the team was not able to evaluate them and therefore they are not included in this report.

3.1.3 Analysis of the data

Each data set of cultural facts from each of the five methods was analyzed independently to avoid subjective, pre-mature conclusions or biased results. Please see Figure 3 below which depicts the analysis process.

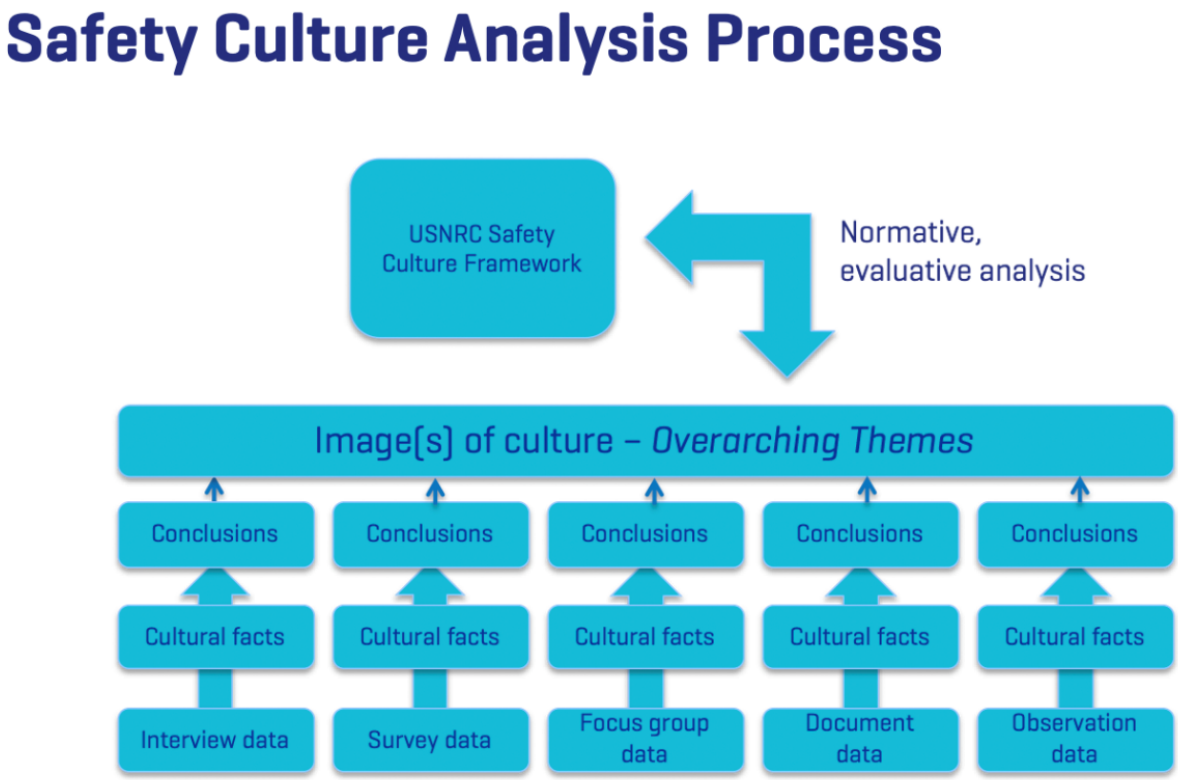


Figure 3: The safety culture assessments analysis process

The first part of the descriptive analysis process identified and categorized the cultural facts from each method, interviews, focus groups, observations, document review and the survey. A cultural fact is information that will help in understanding the underlying assumptions, values, perceptions, and beliefs of an organization. The result of this analysis identified four overarching themes which best described the collection of cultural facts.

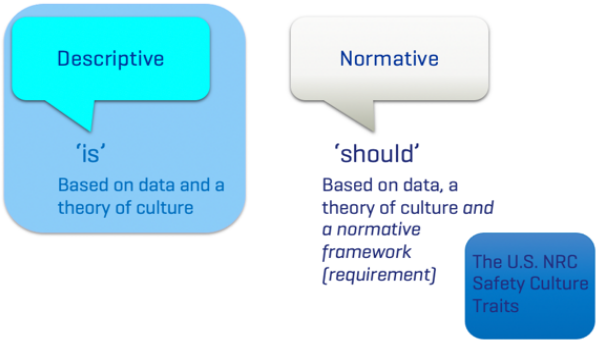


Figure 4: Division between Descriptive and Normative

The second part of the analysis process evaluated the safety implications of the four overarching themes in regard to the normative framework of USNRC. This normative framework's ten traits of a healthy safety culture was used to identify positive observations and areas in need of attention. To summarize, the methodology divides the analysis process into two phases; descriptive and normative (see Figure 4).

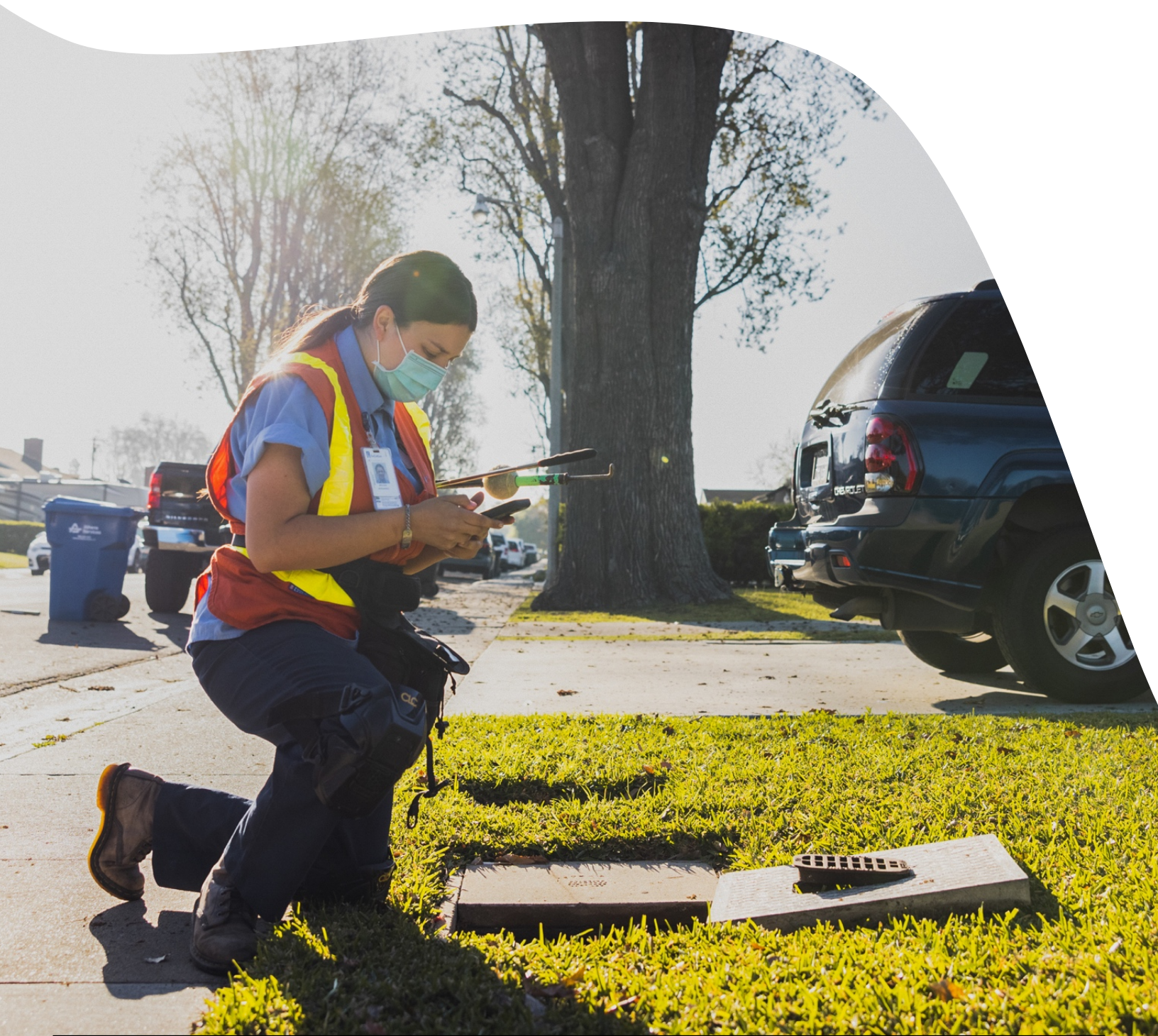
3.1.4 Sharing of the results

In agreement with CPUC, SoCalGas, and Sempra, the results of the assessment were verbally presented. 2EC engaged in a dialogue with these organizations to create a shared understanding of the cultural strengths and weaknesses identified in this assessment. The intent of the dialogue was to learn and proactively evolve the leadership and culture for safety. SoCalGas and Sempra managers and its employees were invited to engage in the dialogue.

Such dialogues throughout the process are important. If commitment to and ownership of the assessment results can be established from the beginning, improvement actions will be more effective and sustainable. One benefit of this type of assessment is to evolve the organization's leadership and culture for safety.

For this assessment 2EC presented a strong and knowledgeable team. The team has in-depth knowledge, scientific and factual comprehension of leadership and culture for safety and safety culture assessment. The team biographical summaries are presented in Appendix A.

"The 2EC team interacted with over 700 people through 64 interviews, 84 focus groups, and 75 observations. This was approximately 10% of the population being assessed."



4 Assessment Results

The results of the Independent Safety Culture Assessment of SoCalGas and Sempra are presented below. The information, cultural facts, collected from all five assessment methods were independently reviewed, analyzed for cultural themes and then integrated to describe overarching themes that accounted for most of the data. The overarching themes and the facts that they describe were then analyzed and compared to the USNRC/INPO normative framework.

As evidenced by the cultural facts, positive aspects of all of these traits have been identified in this assessment. However, when the facts are compared to the attributes of each trait, areas in need of attention are also clearly evident. While the framework is helpful in organizing the enormous amount of information collected, the presentation of the results by themselves do not complete the entire picture. The integration of the four overarching themes identified in this assessment is the final step necessary to understand what the facts mean; this is presented in the conclusions section.

Each of the four overarching themes is described by several of the normative traits;

- **Overarching Theme 1 - Safety is most often perceived as personnel safety.**
  Normative Traits:
  - Leadership Safety Values and Actions
  - Personal Accountability
  - Decision-Making
- **Overarching Theme 2 - Safety and risk are perceived as achieved by compliance.**
  Normative Traits:
  - Questioning Attitude
  - Environment for Raising Concerns
  - Respectful Work Environment
- **Overarching Theme 3 - Resources are needed to promote a healthy safety culture.**
  Normative Traits:
  - Work Processes
  - Effective Safety Communication
- **Overarching Theme 4 - Learning and safety improvement require an integrated management system.**
  Normative Traits:
  - Continuous Learning
  - Problem Identification and Resolution

Facts demonstrating positive observations and facts demonstrating areas in need of attention are presented. The facts presented in this report were those that were repeatedly collected across the different methods and therefore represent a shared understanding, belief or value in the organization. It is important to remember that the cultural facts collected represent the reality of the members of the organization through their perceptions, values, beliefs, and understandings. The normative traits identified as support for each theme are not mutually exclusive or independent. Some could be used in several themes but were best described by the facts supporting the attributes and behaviors of a particular theme.

The use of the term "interviewees" refers to those individuals that participated in either two-on-one interviews, focus groups, or conversations in the field. Facts which address the specified discrete questions contained in the OII, are identified by the letter D and then the number of the question they address, e.g. D1 – information related to Question Number 1, next to them. It is important to understand that while there may be specific interest in the answers to these discrete questions, the facts associated with them also represent part of the cultural analysis of this assessment. Additional information regarding the discrete questions is presented in Appendix E.

This independent safety culture assessment is a snapshot of a period of time. While the team recognizes that recent efforts are being made to address some of the areas identified, the team was not able to evaluate them and therefore they are not included in this report.

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

Perceptions drive behavior. Therefore, describing the perceptions of the individuals in an organization can help to facilitate an understanding of what drives the safety behavior that is observed. This assessment identified that the perceptions of safety are most often perceived as personnel safety in both the SoCalGas and Sempra Energy organizations.

A healthy safety culture includes, but is not limited to, personnel, process, security, public, and environmental safety. In both Sempra and SoCalGas when safety is discussed it is most often understood and described as personnel (occupational, industrial, the physical and mental well-being of employees) safety. Various documents reviewed, and statements made by management, talk about safety culture as including safety of employees, customers and the public. However, during this assessment employees and managers talked almost exclusively about personnel safety. This indicates that people in the organization understand safety in a very narrow sense. Stated in another way, while the organization may espouse a broad conception of safety culture, that view has not been internalized by people in the organization

Public safety and security are generally included in conversations about risk, but discussions of safety often do not include discussions of risk types or sources. Perceiving safety in practice as predominately personnel safety limits the development of personal responsibility for working on public safety and security. The emphasis on personnel safety leads individuals to believe that if they take care of personnel safety, they have met their organizational responsibilities and other potential risks around public safety or security may be ignored or not viewed as important. Following this narrow view, the positive achievements in personnel safety and reward systems can lead to complacency in addressing the larger issues of safety.

The safety implications of this overarching theme are best understood by examining three of the normative traits for a healthy safety culture: Leadership Safety Values and Actions, Personal Accountability and Decision-Making. The facts associated with these traits exemplify the emphasis on the perception of safety as personnel safety often to the exclusion of public safety and security. In terms of normative traits, the analysis identifies some positive qualities but specific areas of concern exist regarding 1) leaders demonstrating a commitment to public safety, 2) individuals taking personal responsibility for public safety, and 3) decisions prioritizing public safety and security.

"Perceptions drive behavior. Therefore, describing the perceptions of the individuals in an organization can help to facilitate an understanding of what drives the safety behavior that is observed."

4.1.1 Leadership Safety Values and Actions – Leaders demonstrate a commitment to safety in their decisions and behavior.

4.1.1.1 Positive Observations

- Personnel safety is widely perceived to be a value in the organization; response to COVID-19 is frequently cited as a positive example.
- Documentation identifies SoCalGas's values and leadership's commitment to safety (SPD-02, Appendix D).
- The Enterprise Risk Policy and Plan details Sempra's analysis of potential threats to the company.
- The Sempra governance model of SoCalGas is perceived to ensure that safety is constantly scrutinized through a variety of monitoring techniques.
    - SoCalGas has its own Board of Directors (D1).
    - Sempra influence is to ensure that SoCalGas operates in the framework of Sempra values (D1).
    - Interviewees indicated that Sempra Board Meetings follow quality and effectiveness of day-to-day activities, but do not manage the operating companies. Executives described this as the right model for assessing enterprise risks (D2,3).
    - Executives described that governance was conducted through the briefing of safety programs and by bringing innovation in technical and safety areas to different operating companies (D1,2).
    - Updates provided for SoCalGas and SDG&E through the Chairman; only two Sempra companies under CPUC regulation (D1,3).
    - The Sempra Audit Team reports to the Sempra Board of Directors (D1,3).
    - Some Sempra Executives and Board Members have visited some SoCalGas locations (D3,8).
    - The Safety, Sustainability and Technology (SST) Committee of the Sempra Board reviews SMS, wildfires, construction safety with LNG, safety with gas infrastructure, fatalities (D1,3).
    - Executives and Senior Managers indicated that they obtain outside perspectives of safety through selection of an independent safety committee for the Sempra Board and an independent safety council for the SoCalGas Board. (D2).
    - Sempra governance keeps safety as part of performance measure and compensation (D7).
    - Interviewees indicated that the SoCalGas Senior Management Team has a strong respect for the Sempra Audit Team in their quality assurance role. (D1,3).
    - Observations indicated that Sempra intends to further support relations to regulators and legislators focusing on consistency with goals in lobbying and with trade associations.
- The overall response rate to the Safety Culture Perception Survey was quite high, 85% among SoCalGas employees and 79% among Sempra employees.
- Among Sempra respondents to the survey, 40% were Directors, Officers, Managers and Supervisors.
- All average scores to the survey questions among Sempra respondents were higher than those of SoCalGas survey respondents.
- SoCalGas survey respondents among the Leadership, SMS, Human Resources, Integrity Management, Management & Strategic Planning, Communication and Local Government and Community Affairs groups had the highest overall scores on the Safety Perception Survey questions.
- SoCalGas respondents to the Safety Culture Perception Survey had positive perceptions of leadership's commitment to safety; Directors and above had the most positive perceptions of safety culture.

4.1.1.2 Areas in Need of Attention

- Public Safety and Security were seldom discussed in the conversation around safety.
  - 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.
  - During System Status calls at SoCalGas, other than an initial Safety Tip, no mention of safety was made around the work processes being discussed.
  - Most documents reviewed around effective safety communication focused exclusively on personnel safety, e.g., driving policy, health protocols.
  - Interviewees at SoCalGas indicated that employee safety training focuses on personnel safety without the inclusion of public safety.
- The absence of Security was noted during multiple field observations at SoCalGas.
  - An installed fence was removed for construction and not replaced.
  - No security at several visible and accessible site entrances that had exposed pipes.
  - Aliso Canyon is now getting additional and updated security cameras.
  - 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.
- 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.
- 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.
  - 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)
  - Change management is related to business units more than safety with no systematic risk assessment of change (SPD-03, Appendix D).
  - 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.
  - 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.
  - Interviewees perceive that most "management of change" is around changing standards.
  - Interviewees expressed the opinion that SoCalGas tries to comply with CPUC through changing policies without the appropriate change management strategy.
  - Interviewees describe change management occurring by email without any explanations.
- Leaders at SoCalGas are not consistently observing, coaching or reinforcing standards and expectations.

  - 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.
  - 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.
  - The lowest scores on the survey questions for Sempra respondents around leadership were about management being in the field. (D1,8)
  - 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.
  - SoCalGas interviewees described leaders talking about safety, but that they don't take action to replace old equipment or provide better equipment.
  - 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.
- 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.
  - 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).
  - Some interviewees believe that the SoCalGas Board is strongly influenced by Sempra because of the significant participation by Sempra officers. (D2,3)
- 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%).
- Nearly a third of all SoCalGas survey respondents do not perceive that employees are recognized for safety conscious behaviors.
- Approximately 20% of SoCalGas survey respondents indicated that they are sometimes cynical about safety.

4.1.2 **Personal Accountability –** All individuals take personal responsibility for safety.

4.1.2.1 Positive Observations

- Safety Culture Perception Survey respondents indicated an overall positive perception of personal accountability.
- Directors who responded to the Safety Culture Perception Survey were the most positive with respect to personal accountability.
- Interviewees indicated that they understand and are trained to take a serious responsibility about their personal safety and how it impacts family, community and other workers at SoCalGas.
- Individuals at SoCalGas identified that the Union sometimes provides checks and balances for decisions involving safety and will hold front line supervisors responsible for personnel safety.

- interviewees indicated that SoCalGas cannot impose financial consequence on contractors for making a mistake but perceive that the loss of future contracts is even more powerful in getting contractors to achieve high safety standards. An example cited was a contractor self-reported a fatality on another job site, SoCalGas requested them to perform a safety culture assessment and the contractor could not bid a SoCalGas job for 6 months until improvement in their safety performance could be demonstrated. The company is being monitored and slowly returning to acquiring SoCalGas business.

4.1.2.2 Areas 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.
- Several interviewees at SoCalGas indicated that there is no accountability, 'I can do wrong and there is no consequence'.
- Several interviewees at SoCalGas when asked who owns safety, responded Leadership and the Chief Safety Officer.
- 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.
- 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.

4.1.3 Decision-Making - Decisions that support or affect safety are systematic, rigorous, and thorough.

4.1.3.1 Positive Observations

- Safety Culture Perception Survey respondents had positive perceptions about decision-making in both the SoCalGas and Sempra organizations.
- Decisions made to protect personnel during the COVID-19 pandemic have been praised by many of the interviewees.

4.1.3.2 Areas in Need of Attention

- 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.
    - 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.
    - 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.
    - 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.
    - Interviews indicated that supervisors and managers underestimate the number of interpretations, judgments, and field relevant knowledge that their field workers report and struggle with.
    - Interviewees indicated that calls on categorizing leaks are judgment calls.
    - Interviewees indicated that in analyzing risk they are finding a more cost-effective solution, emphasizing the talk around cost.

4.2 Overarching Theme 2 – Safety and risk are perceived as achieved by compliance.

Public safety in SoCalGas and Sempra is mostly understood in terms of risk. However, this assessment identified that the approach to risk and risk management is not yet systemic. To date, the RAMP and integrity management programs at SoCalGas have not yet been integrated and yet are known to impact each other. Different types of risk often have their own department, e.g., different areas of integrity management Having a more integrated approach would increase the probability of identifying not only the obvious threats to risk but those that might be exacerbated when combined with others.

Further, the approach to risk is frequently reactive and focused narrowly in terms of compliance. While compliance is a necessary condition for safety it is rarely sufficient. A compliance culture often does not recognize the complexity of field conditions and does not develop proactive measures. This assessment identified that many of the actions taken by SoCalGas and Sempra are compliance driven. Reliance on compliance-based behavior reduces early identification of potential problems and focuses on rule-based behavior. This approach does not lend itself to looking at the complexity of systems.

Discussions regarding safety culture across industries suggest a continuum of organizational development — a compliance phase, a performance phase, and a systemic phase. In the compliance phase the organization is just trying to meet the requirements of the rules and regulations imposed by external stakeholders. As the organization moves on to the performance phase it is learning to manage safety performance through measurement of process. At the systemic phase, safety becomes a way of doing business and is integrated into all aspects of the organization at the most fundamental levels. In the systemic phase organizations seek to identify internal and external factors that could influence safe

performance of work and develop predictive, preventive and compensatory controls for the broad spectrum of risk types[17].

This assessment identified that SoCalGas and Sempra have not yet developed beyond the compliance phase in the maturity of their culture for safety. Changes are needed to move along to the next phases of development. In addition to the concerns raised regarding the conception of safety itself, a comparison to the normative traits suggest that the changes needed are limited by 1) an environment that is not conducive to raising concerns and 2) that the organizations have not developed a robust environment for raising concerns. The changes are most evident in the traits of the normative framework identified as Questioning Attitude, Environment for Raising Concerns and Work Environment

4.2.1 **Questioning Attitude –** Individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action.

4.2.1.1 Positive Observations

- Interviewees indicated that the SoCalGas Board uses its External Safety Advisory Council to ask probing questions to understand the implications and consequences on safety of proposed activities (D2).
- Stop the Job is frequently identified by interviewees as a tool that allows them to stop work activities when confronted with an unexpected condition, communicate with supervisors, and resolve the condition prior to continuing work activities.
- Respondents to the Safety Culture Perception Survey had positive scores in response to the statement about being encouraged to adopt a cautious and questioning approach in their work.

4.2.1.2 Areas in Need of Attention

- 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 contribute to the lack of a questioning attitude.
- Interviewees across various locations in SoCalGas expressed concerns that some leadership has accepted the smell of gas as normal.
- 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.
- 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.
- Some interviewees indicated that SoCalGas has a long history of a compliance mindset versus a competence mindset.
- 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

[17] Adapted from the safety culture maturity model developed by Lawrie, M., Parker, D., & Hudson, P. (2006). Investigating employee perceptions of a framework of safety culture maturity. Safety Science, 44(3), 259-276.

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.

4.2.2 **Environment for Raising Concerns –** A safety conscious work environment (SCWE) is maintained where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination.

4.2.2.1 Positive Observations

- Interviewees reported that few individuals were ever fired for self-reporting their own mistakes.
- Safety Culture Perception Survey respondents from both SoCalGas and Sempra were positive in their responses to understanding that they are responsible to raise concerns.
- Interviewees indicated that the board meetings have an open climate for discussion.

4.2.2.2 Areas in Need of Attention

- Some SoCalGas interviewees indicated feeling inhibited to raise safety concerns because of fear of embarrassment or harassment by supervision.
    - 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.
    - 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.
    - Interviewees indicated that they perceive they cannot use Stop the Job in the Call Center.
    - Several interviewees at different locations indicated that they perceive pressure not to report injuries and would not feel 'safe' doing so.
    - Interviewees indicated that an open dialogue with the upper management is missing.
- 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.
- For Sempra respondents on the Safety Culture Perception Survey, scores were less positive in response to the statement that criticism is encouraged and, in the ability, to challenge decisions.

4.2.3 **Respectful Work Environment –** Trust and respect permeate the organization.

4.2.3.1 Positive Observations

- Observations indicated that SoCalGas Customer Service Technicians, Field Technicians and Inspectors were very courteous to customers and respectful of their property.
- Most SoCalGas respondents to the Safety Culture Perception Survey responded positively to the statement that there is respect and trust within the company.
- Interviewees indicated that the SoCalGas responses in the recent Employee Engagement Survey were very positive compared to industry peers.
- Most interviewees describe the company's treatment of employees during the COVID-19 pandemic as very sensitive and positive; concerns about going into customers' homes, frequent assessments of employees' attitudes and opinions about working from home and schedules; benefits to reduce the impact of the burden from the 'new normal'.

- Most interviewees described SoCalGas as a good company, with good compensation, and good employees.
- Interviewees indicated that Sempra and SoCalGas value diversity and inclusion in their organizations.
- Contractor interviewees perceive that SoCalGas has a lot of trust in them and that the contractors work well with the SoCalGas crews.

4.2.3.2 Areas In Need of Attention

- 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.
    - 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.
    - Individuals working excessive overtime in safety sensitive positions, e.g., safety field representatives.
    - During unannounced observation facilities were identified that were not conducive to a safe environment and housekeeping was not maintained.
- 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.
- SoCalGas interviewees indicated that trust is not fostered among many individuals and work groups across the organization.
    - 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.
    - 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.
    - 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.
    - 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.
- 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.
- SoCalGas respondents to the survey also indicated lower perceptions around the trust between management and staff and between work groups.
- 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.

- 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
- 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.

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

The allocation of resources including money, people, equipment, and time, is an attribute of leadership. Leaders ensure that personnel, equipment, procedures, and other resources are available and adequate to support safety. This assessment identified through interviewees that there are concerns especially within SoCalGas about whether safety is prioritized through the allocation of resources.

Consistently reported issues around technology, staffing and equipment, demonstrate short sightedness in the understanding of their impact on safety.

In regard to traits in the normative framework, a number of gaps are seen in 1) The process of planning and controlling work activities at SoCalGas so that safety is maintained, and 2) in effective safety communication. This is best understood by examining the facts supporting the traits in the normative framework of Work Processes and Effective Safety Communication.

4.3.1 **Work Processes –** The process of planning and controlling work activities is implemented so that safety is maintained.

4.3.1.1 Positive Observations

- SoCalGas Safety Culture Perception Survey respondents had a positive perception of the work processes.
- Most survey respondents for both SoCalGas and Sempra indicated that there was a low level of risk-taking behaviors in their organizations.
- Some management interviewees at SoCalGas indicated that they believe that about 95% of jobs are done correctly the first time.
- Many SoCalGas interviewees described policies being good for the most part and that the company allows employees dedicated time to review policies.
- Some Senior Management interviewees at SoCalGas perceive that the SED of CPUC trusts them and their engineering work enough to ask for their engineering advice.
- Contractor interviewees indicated that they use SoCalGas procedures because they perceive them to be correct and helpful.

4.3.1.2 Areas 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.
- 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 (DR 08 Q01 Attach.02, Appendix D).
    - 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.
- 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. (D6)
- SoCalGas interviewees reported that sometimes tools, equipment, procedures and other resource materials are not available to support successful work performance.

  - 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.
  - 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.
  - 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.
- SoCalGas does not 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.
  - Observations in the field and interviewees indicated that maps are often not up to date.
- Some interviewees at SoCalGas indicated that certain work processes do not always include the identification and management of risk commensurate to the work.
  - 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').
  - Interviewees indicated that the criteria to conduct any type of Incident Investigation are initially determined by local management.
  - 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)
  - 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)

  - Distribution and parts of transmission are shared services with SDG&E and therefore reporting to two CEOs and two Board of Directors which leaves responsibilities and priorities unclear.
- 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.

4.3.2 Effective Safety Communication – Communications maintain a focus on safety.

4.3.2.1 Positive Observations

- Leaders frequently communicate and reinforce the expectation that safety is the organization's priority.
  - There are multiple documents concerning COVID protocols, the Safety Management System, required safety training, etc. (Q02.12 Attachments, Appendix D).
  - The Incident Command System was set up for COVID and communication with the field and stakeholders occurred within 48 hours of any significant events.
  - There are multiple videos concerning leadership commitment, safe driving procedures, Safety Management System Framework and Safety Values (Q02.12 Attachments, Appendix D). (D8)
  - There are multiple health bulletins describing the use of hard hats, fall protection, driving policy, etc.
  - Interviewees describe Town Hall meetings as open and useful.
  - Many interviewees indicated that they had monthly safety meetings, yearly safety stand downs at their base and annual safety training. (D8)
  - Observations of two Virtual Safety Congresses, one for SoCalGas Employees and one for SoCalGas Contractors, emphasized Leadership's expectations around safety.
  - Observations indicated that many meetings begin with a safety message.
  - Observations in the field demonstrated that safety briefings were conducted for observers in most, but not all, situations; Observers typically received a Job Hazards Assessments briefing and attended safety tailgates after which they signed on to an acknowledgement form. (D8)
- Sempra Energy has a Safety Summit for the CEOs and COOs of its operating companies. (D1,8)
- Executive interviewees from Sempra and SoCalGas described direct communication, healthy debate, in their Board rooms to create a culture that can trickle down into their organizations. (D)
- Observations indicated that SoCalGas and Sempra Executives are always in the communication loop around events, e.g., involved in situational awareness call; can communicate with each other through calls during an emergency response. (D1,8)
- SoCalGas and Sempra respondents to the Safety Culture Perception Survey had a positive perception of safety communication in their organizations.

4.3.2.2 Areas in Need of Attention

- 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).
- As previously noted, most communication around safety is regarding personnel safety.
- 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.

- 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)
- 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.
    - 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.
    - 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.
    - Many interviewees in lower levels of the SoCalGas organization did not know about SMS or recognize the placard that had been distributed.
    - 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)
    - 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.
    - Interviewees described a competitive atmosphere between departments (silos) that creates barriers to a healthy flow of information.
- 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.
- Many SoCalGas respondents to the survey were not aware that contractors are involved in safety discussions.

4.4 Overarching Theme 4 – Learning and safety improvement require an integrated management system.

An effective integrated management system is a tool that can help an organization connect the dots across all its processes to ensure meeting its goals and desired performance. It transcends group differences and becomes the backbone that ties the organization together regardless of how diverse the products and services may be. This assessment identified through interviewees that SoCalGas does not have an effective integrated management system. Functions that should be centralized are embedded in individual units of the organization e.g., Quality Assurance, Incident Investigations, and until recently Safety. This reflects a mindset that differs from that in a healthy safety culture. These groups should be independent of those that they are evaluating and supporting.

SoCalGas is limited in its ability to work across systems and processes, to understand the way in which collective information can facilitate learning. In terms of the normative framework gaps in attributes of the traits of Continuous Learning — Opportunities to learn about ways to ensure safety are sought out and implemented — and Problem Identification and Resolution — Issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance are most relevant, were identified. This is best described by the traits of Continuous Learning and Problem Identification and Resolution from the normative framework.

4.4.1 **Organizational Learning –** Opportunities to learn about ways to ensure safety are sought out and implemented.

4.4.1.1 Positive Observations

- SoCalGas has documentation describing processes around continuous improvement goals, lessons learned. (SPD-02).
- Sempra and SoCalGas respondents to the Safety Culture Perception Survey had positive perceptions of continuous learning.
- SoCalGas provides training to maintain a knowledgeable, competent workforce and instill safety values.
    - Observations indicated ongoing innovations in training technology.
    - Learning by doing at the Situation City complex engages students and is provided by experienced instructors.
    - Interviewees expressed the opinion that ride-alongs are an important part of learning.
    - Some managers indicate that the purpose of training for SoCalGas is to make it a better learning organization.
    - Some managers believe that training is more valued now than it used to be.
- SoCalGas interviewees indicated that there is a greater understanding and appreciation of the need for good data and monitoring after the San Bruno event. (D4)
- SoCalGas benchmarks with PG&E and SDG&E to learn about contractor incidents. (D6)
- SoCalGas shares information as part of Sempra's Enterprise Dashboard on safety and upstream indicators for downstream performance. (D8)

4.4.1.2 Areas in Need of Attention

- Documentation indicates that SoCalGas metric reports are driven by CPUC requirements. While various Incident Evaluation Process documents (IEPs) discuss causal factors, none of the analyses conducted looked at extent of condition or cause. Such analysis is valuable for looking at systemic issues that if corrected can prevent future occurrence. (D5,9)
    - IEP 20-023 was attributed to a calculation error where the guidance was unclear.
    - IEP 18-004 was attributed to a planner who did not correctly interpret the requirements.
    - IEP 17-028 was a late reporting event to the CPUC because Gas 183.05 Standard lacked clarity on timing and had unclear roles and responsibilities.
    - Interviewees describe the root cause analysis process as poor and arbitrary.
- SoCalGas respondents to the Safety Culture Perception Survey indicated fewer positive responses to the statement around the development of leadership skills.
- 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.
- 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)
- 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

- 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)
- Many interviewees at SoCalGas indicated that the organization has not developed and effectively implemented knowledge transfer and knowledge retention strategies.
    - Interviewees perceive that the lack of a knowledge transfer process is a risk to the company.
    - Interviewees indicated that knowledge transfer is not documented.
    - Interviewees indicated that some individuals get hired without experience, don't always get training, and then get promoted.
- Respondents from SoCalGas to the Safety Culture Survey indicated frequently in their comments that an effective knowledge transfer process was needed.
- 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.
- 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.
- Many interviewees expressed the opinion that SoCalGas is a reactive organization. (D5,6)
    - Interviewees described the belief that things only change after something has happened.
    - 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.

4.4.2 Problem Identification and Resolution – Issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.

4.4.2.1 Positive Observations

- Documentation indicates that Sempra conducts audits across the SoCalGas organization.
- Interviewees indicated that SoCalGas is working on a mobile application for reporting near misses in real time. (D3)
- Interviewees indicated that 14 current SoCalGas applications are being replaced with one common platform; questions about the transition between systems remain.
- Interviewees indicated that CPUC approved funding for everything requested that is safety related, reliability is sometimes rejected.

4.4.2.2 Areas in Need of Attention

- SoCalGas has not implemented a program with a low threshold for identifying issues from within its own organization.
    - 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)
    - 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)
    - 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)

  - 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.
  - Executive Managers indicated that SoCalGas near miss reporting could be better.
- 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.
- SoCalGas Interviewees indicated that suggestions for improvements take too long to get a response, or they do not receive a clear response.
- 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.
- 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.

"It is important to remember that the cultural facts collected represent the reality of the members of the organization through their perceptions, values, beliefs, and understandings."

5 Conclusions

Central to the conclusions of this assessment is the concept of safety internalized by the SoCalGas and Sempra organizations. Various documents reviewed and statements by management talk about safety culture as including safety of employees, customers and the public. However, during this assessment employees and managers talked almost exclusively about personnel safety. This indicates that people in the organization understand safety in a very narrow sense. Stated in another way, while the organization may espouse a broad conception of safety culture, that view has not been internalized by people in the organization. For example, the 2020 SCG Gas Safety Plan is comprehensive recognizing and planning around a wide range of safety and risk factors. Yet little of that shows up in the focus groups and observations in this assessment. Much of the plan is directed toward technical solutions and checklist. Little attention is given to the culture through which these will be enacted.

In a proactive highly reliable organization people will speak about public safety, psychological safety, process safety, and security in addition to personnel safety. These other aspects of safety are often alluded to more indirectly than directly and if the message is intended to incorporate them it does not appear to be resonating.

The emphasis on personnel safety accounts for other results that were obtained. The very positive responses to the statements on the Safety Culture Perception Survey may be driven by the concept of personnel safety, probably implicitly by the internalization of the concept by the respondents. The overwhelming positive perceptions about the SoCalGas organization's response to the COVID-19 situation are a direct example of the emphasis on the care of employees and personal safety, and justifiably so. However, a healthy safety culture is not just predicated upon the perceptions and beliefs around personnel safety. This seemingly singular preoccupation with personnel safety by SoCalGas and Sempra limits the understanding and actions necessary to establish a comprehensive approach to safety and therefore a truly healthy organizational safety culture.

Executives and Senior Managers in the SoCalGas and Sempra organizations often present an overconfidence in their depiction of how safety is valued in their organizations. This perception is self-reinforced through the emphasis on personnel safety metrics and anecdotes but not substantiated in other aspects of safety as presented in the results of this assessment. Such views may also increase complacency about public safety, as leaders often assume that good personnel safety outcomes mean good public safety and that is not often the case.

The perceptions of management are also not aligned with the perceptions of those that are working in the field. The disconnect between management and staff on many of the issues identified in this assessment have created a hierarchical culture in the organization that also creates barriers to achieving a comprehensive approach to safety. Without development of a more learning and listening leadership the gap will continue to widen between the levels in the organization. The identified lack of trust, collaboration and coordination that exist in the SoCalGas organization are challenging the efforts for implementing systems that will promote a more integrated and comprehensive approach to a healthy culture for safety.

Another limitation created by the narrow view of safety held by the SoCalGas organization is that it is inhibiting the organization to move past the compliance stage in the development of a healthy culture for safety. This assessment identified that many of the actions taken by SoCalGas, and Sempra are compliance driven. Reliance on compliance-based behavior reduces proactivity and focuses on rule-based behavior. This approach does not lend itself to looking at the complexity of systems and the impact on safety. SoCalGas interviewee's responses and field observations also identified that the behaviors based on following the rules are often in tension with the reality of operations required to use many of the SoCalGas and Sempra policies. The existence of many 'grey areas' in policies used by all levels of SoCalGas creates conflicts within a 'compliance-based culture'. Individuals must often make judgments and yet have expressed concerns about raising issues or challenging decisions. These opinions are also most prevalent in groups on the operations side of the organization.

Without a broader comprehension of safety, other processes are often not used most effectively or seen for their value in driving the organization beyond a 'compliance mentality' towards a learning organization. In this assessment one clear example identified for SoCalGas by interviewees is in the area of causal analysis. The intent of causal analysis is for an organization not only to understand the causes of an event, but to learn from them by looking beyond the immediate situation to the broader organization. The incident investigation process used by SoCalGas is a reflection of the lack of understanding of a more comprehensive approach to safety and the underlying factors contributing to the event. Much of the incident analysis is conducted locally and independently and when cross functional investigations do occur, they are conducted without the benefit of extended analysis. The investigations also do not include any inquiries related to the traits important for a healthy safety culture.

Public safety at SoCalGas and Sempra is most understood in terms of risk. However, this assessment identified that the approach to risk and risk management is not yet integrated into a coherent and broader understanding of safety. Risk management at SoCalGas is conducted through the RAMP and integrity management through four different elements (Transmission, Distribution, Storage and Facilities). To date, RAMP and the elements of the Integrity Management Program have not yet been integrated and yet are known to impact each other. Having a more integrated approach would increase the probability of identifying not only the obvious threats to risk but those that might be exacerbated when combined with others.

The lack of appreciation for a more encompassing concept of safety are also reflected in the allocation of resources by SoCalGas. Issues around staffing and equipment, demonstrate short sightedness in the understanding of their impact on safety. In some cases, the impact is also clearly on the value of personnel safety.

SoCalGas lacks an integrated management system. Functions that should be centralized are embedded in the line organization e.g., Quality Assurance, Incident Investigations, and until recently Safety. This reflects a mindset that differs from that in a healthy safety culture. These groups should be independent of those that they are evaluating and supporting. They should be facilitating learning throughout the organization. Systems related to training, documentation, work processes that are central to the organization should be connected through an integrated system and management of change process that can be coordinated throughout the organization.

This assessment identified positive observations for SoCalGas and Sempra Energy in all of the traits for a healthy safety culture. The positive and effective response to the COVID-19 situation, the Situation City training complex and the desire to learn and continuously improve from external stakeholders are noteworthy. It will take a cultural change, however, to maximize the benefit from those observations as well as all of the information collected in this assessment.

In sum, the assessment of Sempra and SoCalGas in relation to the normative traits for a healthy safety culture, areas needing attention were identified and supported with extensive data. Numerous opportunities to improve exist. The Positive Observations discussed similarly provide opportunities to enhance safety culture by building on what is already working.

Overall SoCalGas is highly "siloed." For example, risk and safety are conceptually and functionally separated. And departmental segmentation occurs around types of risks. But even more generally, information sharing, coordination of activities, and learning do not occur across levels and divisions. While SoCalGas management has described having developed and implemented a safety management system (SMS) it is still only partially implemented and does not appear to be integrated into everyday operations. Individuals at lower levels of the organization were unaware of the SMS and what its objectives are.

While the report contains many more details, a summary here can be given of areas needed attention relative to an adaption of the traits for a healthy safety culture. These include:

Leadership Safety Values and Actions: Leaders clearly espouse the value of safety generally, though clearly mostly emphasizing personnel safety. Reward systems also have an emphasis on personnel safety and use lagging indicators to assess safety performance. They do not seem to integrate public and security risk into their messages, measurements, or rewards. (D7,9)

Effective Safety Communication: Current safety communication is limited in several ways. Safety is conceptualized narrowly, and interviewees talked almost exclusively about personnel safety. Less of the training, meetings, and messages consider public and security risks. Little upward communication exists to

identify field-based experiences that create potential public risks including things like effects of staffing, supervisor experience, overtime and fatigue, and knowledge transfer.

Decision-Making and Work Processes: Staffing issues were described by interviewees at a number of SoCalGas locations. Concerns were often raised around fatigue, overtime, emergency response systems, replacement of employees, loss of field experience workers and their expertise, the increased use of sub-contractors, and the lack of field experience of supervisors and planners. Some workers reported that they are often not equipped to make the kind of policy and procedure interpretations necessary in complex and unexpected field conditions. This does not lead to a list to be fixed but suggests that the culture that has led to these concerns has not prioritized safety.

Environment for Raising Concerns and Questioning Attitude: Basic principles for a questioning attitude, especially regarding personnel safety exists and is clearly reinforced. People are not punished for raising concern. But many SoCalGas employees especially working in the field indicated that they do not feel that they can raise concerns and/or that they will not be acted on.

Continuous Learning and Problem Identification and Resolution: The lack of adequate knowledge capture and transfer processes came up often in the SoCalGas interviews. Part of this appears to arise from the silos where learning is not shared across levels and divisions. But it comes also in the employee replacement processes, the lack of adequate reporting and analysis of close calls/near misses, and event investigations. The lack of leading indicators makes identification of evolving problems difficult and adds to the reactivity of the compliance mindset.

Personal Accountability: The report details incidents at SoCalGas of shifting blame and trying to keep from being blamed. Situations are documented where compliance and rule following existed even when best judgments might suggestion other choices.

At a high level, these difficulties build on each other. Without a clear and robust concept of safety, safety communication suffers; when communication suffers decision making and work processes cannot be directed toward safe choices; without an environment for raising concerns the problems in choices cannot become visible and discussed; hence problems are not proactively identified and the organization does not learn; and finally personal accountability becomes weak.

The items above are linked to traits essential for a healthy safety culture.

They each merit attention, discussion and deliberation. However, attempts to address individual items needing attention by incremental improvement is unlikely to result in substantive or lasting change. Thus, individual items are best addressed in relation to larger cultural forces.

5.1 Responses to the Questions Posed in the OII

Facts that address the specified discrete questions posed in the OII are identified in the Results Section by the notation (D) next to them. Appendix E lines up these results with the individual OII questions. CPUC's perception of safety and culture for safety is somewhat different from the approach and perspective of the normative framework and concept of safety culture used in this assessment. The questions provided by the OII focus on cultural artifacts, and they may not accurately represent the culture. The responses provided in Appendix E and identified in the Results Sections are descriptive facts and not evaluative answers. The assessment of these responses to the questions are integrated into the cultural analysis. The best effort to

obtain information to answer these questions was made and in some cases the information available was limited.

2EC's concern in addressing these questions is centered around the perception of what the answers to these questions really mean and how the responses will be used. The creation of action items to address each question specifically would most likely not facilitate the cultural change necessary to help the organization continue a positive momentum along the continuum of safety culture development. They also do not fully identify that all aspects of safety should be considered in any opportunity for change. The recommendations for the CPUC in response to this assessment provide guidance on how to use the information collected not only in response to the discrete questions but to all of the facts identified in this report.

"In sum, the assessment of Sempra and SoCalGas in relation to the normative traits for a healthy safety culture, areas needing attention were identified and supported with extensive data. Numerous opportunities to improve exist. The Positive Observations discussed similarly provide opportunities to enhance safety culture by building on what is already working."

6 Recommendations

The areas needing attention, along with the supporting data, discussed for each of the Overarching Themes provide numerous opportunities to improve. The Positive Observations discussed similarly provide opportunities to enhance safety culture by building on what is already working. Each of these items merit attention, discussion and deliberation. However, the data obtained during this assessment indicated that attempts to address individual items needing attention by incremental improvement is unlikely to result in substantive or lasting change. Culture change takes time and starts with an evolved understanding about the underlying drivers of the organizational behaviors. Sustainable change addresses the underlying assumptions and perceptions that drive the organizational behaviors. Often organizations tend to create corrective actions addressing the visible manifestations of the culture such as behaviors, policies, metrics, instructions. These corrective actions will not be effective in the long term. Similar or the same kind of issues will occur again as the root of the issues were not addressed, i.e., the underlying dynamics of assumptions and perceptions.

Safety is most often perceived as an issue of personnel safety. A more comprehensive approach to safety is needed. This would include and not limited to overtime and staffing issues, hiring and recruiting, the training, knowledge and mentoring of supervisors and managers, and other non-operational processes. This means to broaden the perception of safety to encompass all aspects of safety such as personnel, process, security, public, environmental public. Further, exploration needs to be directed towards how these different types of safety interact and influence each other.

The three organizations would benefit from an alignment around a broad concept of safety culture. The organizations might consider a collaborative learning approach as a cost-effective way to work with each other in this area.

The basic safety concept entailed in these related recommendations are not new and are mentioned in documents reviewed for this assessment. For example, SoCalGas's Risk Assessment and Mitigation Phase (RAMP- D) dated May 17, 2021 contains the following "Commitment to Safety":

> *"SoCalGas's longstanding commitment to safety focuses on three primary areas – employee/contractor safety, customer/public safety and the safety of gas delivery system. This safety focus is embedded in what we do and is the foundation for who we are – from initial employee training, to the installation, operation and maintenance of our utility infrastructure, and to our commitment to provide safe and reliable service to our customers."*

The document states that this Commitment "is embraced and endorsed by every member of the senior management team". However, the data collected during this assessment vividly illustrates that the vision of safety expressed in this Commitment is not consistently enacted in practice by fully integrated management systems nor shared and coherently understood by management and operational personnel of SoCalGas. Examples of the discrepancies of perceptions were provided in the discussions in the Overarching Themes and graphically portrayed in the survey responses provided in Appendices B and C.

6.1 Sempra

Sempra needs to support a transition to an enterprise risk management approach which entails a comprehensive perspective of safety for its regulated entities. In so doing this should include psychological safety, worker fatigue, emergency response systems, near miss reporting systems, knowledge transfer

system, and public and environmental safety issues. This would require a change in safety metrics. The approach should be to inculcate a more comprehensive approach to view safety and risk, to reduce silos around aspects of risk and safety, and to build more reliance on leading rather than lagging indicators. (D9)

Below is a roadmap presented on how the recommendations can be enacted. The order of these recommendations is deliberate. The later ones often depend on the earlier ones having been completed effectively. Some of them can also be done concurrently. Please observe that these suggestions are only examples to provide guidance and inspiration on improvement activities. They should not be used as checklist for corrective actions.

Guidance

1. Develop a shared understanding of a robust concept of safety and risk through dialogues with Board Directors and Executives that is facilitated by external and independent experts familiar with a comprehensive perspective on safety and safety culture.
2. Develop and communicate the revised broader vision of safety. This new vision should explain how the revised approach differs from previous approach and implemented in the governance process.
3. Provide training on a more comprehensive concept of safety and safety culture to the organization through facilitated sessions.

6.2 SoCalGas

SoCalGas needs to transition to an enterprise risk management system that is inclusive of a comprehensive view of safety and aligned with the policies developed by Sempra. This will create a change in metrics and the development of leading indicators for SoCalGas. Presently risk management in SoCalGas is fragmented and siloed. Training to enhance the influence of culture for safety for the SoCalGas Board, as well as for the SoCalGas organization, will be needed to ensure integration of the approach across all business units.

SoCalGas will need to implement leading indicators on the integration of its operations. These indicators would include all aspects of safety and integrate the risk indicators used in the integrity management program.

In order to break the silos and to enhance collaboration, coordination and engagement across the organization, both hierarchically and between business units, cross-organizational conversations around comprehensive safety should be implemented. The effectiveness of organizational communication is critical to implementing and sustaining any changes that will be made. The development of change is best completed when all members are able to be engaged and involved in the decisions around change. Ownership of the change will help ensure its sustainability.

SoCalGas has been successful in some change efforts. For example, increasing diversification both internally and externally. Thus considering why these were effective can provide guidance to others, for example, integrating psychological safety into the safety framework. Issues identified in the work environment in raising concerns, in trust and credibility all elements of psychological safety need to incorporate into the thinking around safety. The negative behaviors associated with these elements, while often subtle and covert, are most likely to create the biggest risk to the overall organizational culture.

Below is a roadmap presented on how the recommendations can be enacted. The order of these recommendations is deliberate. The later ones often depend on the earlier ones having been completed effectively. Some of them can also be done concurrently. Please observe that these suggestions are only

examples to provide guidance and inspiration on improvement activities. They should not be used as checklist for corrective actions.

1. Develop a shared understanding of a robust concept of safety and risk through dialogues with Sempra, SoCalGas Board Directors, Executives and Senior Management that is facilitated by external and independent experts.
2. Extend the membership of the SoCalGas Board to include an expert on safety culture and systemic approach to safety.
3. Conduct dialogue sessions with all levels in the organization to create a shared understanding of the assessment results and what comprehensive safety means for each business and organizational unit. The objective of these sessions would be two-fold; 1) self-reflection of the culture based on the results, 2) capture the organizations intelligence and creativity on how to recover the areas in need of attention. Action items should result from the dialogue sessions that will meet the objectives of the sessions.
4. Establish methods for managers to enhance the understanding, skills and enactment on how their leadership can influence the safety culture positively e.g. empowerment, listening rather than telling, learner mind-set.
5. Analyze the resource allocations and competence levels to assure safety and reliability.
6. Provide training to the entire organization with practical examples unique for each department on how the new shared understanding of safety and safety culture to the organization will change the way business is done and why it is important to make the change. This training can be incorporated into existing programs.
7. Incorporate the broader concept of safety e.g. include examples of public safety, security, into safety items on meeting agendas, in tailgates, in job hazard assessments, newsletters, etc.
8. Conduct dialogue sessions with representatives from field personnel across business units on how to best communicate field-based experiences upward in the organization.
9. Develop new guidance through conversations on how to make better decisions when rule-based behavior does not work. Conversations can be centred around different real life scenarios that involved judgements in the field that were not covered in policies.
10. The 'new' comprehensive concept of safety that is to be developed will dictate that certain functions that support and facilitate a healthy safety culture be centralized across the organization to ensure alignment, consistency, and learning. Examine the role of functions like Quality Assurance, Incident Investigation, Safety from an integrated perspective.
11. Evaluate existing reporting systems to determine how they can be integrated and operated from a unified platform. For example incidents from personnel safety should not be in one system and those for gas leaks or pipeline issues in another.
12. Ensure that all potential threats, near misses, close calls, etc. are identified, evaluated, tracked and trended so they can be proactively used to mitigate any potential risks. All types of safety should be included in this activity. (D9)
13. Train managers and personnel to think about potential, unexpected, and unknown conditions, the "what if" this happened situations, to enhance individual accountability and to detect latent safety hazards.

6.3 CPUC

The scope of this assessment did not include the CPUC. Through the facts collected from Sempra and SoCalGas, and the history of regulators and their role in significant events across several industries, recommendations for the CPUC have been formalized to facilitate their supporting and oversight of a healthy safety culture in the Sempra and SoCalGas organizations.

The CPUC needs to have a facilitated internal dialogue around the cultural implications for conceptualizing and evaluating safety. This would include an understanding of how its own culture and practices impacts utilities' culture for safety. From this dialogue CPUC also needs to be able to identify the early signs of declining safety culture through its oversight activities. The CPUC inspection and analysis framework should incorporate safety culture indicators and inspectors as well as decision-makers should be trained to observe, detect and analyze potential emerging safety culture concerns. Benchmarking and collaborating with different industry regulators on how others oversee safety culture in their respective environments could provide some valuable insights for CPUC in directing its own activities.

The report identified examples of how CPUC initiated actions for SoCalGas and promoted the utility's reactive, rather than proactive behavior. It would be helpful for the CPUC to conduct an assessment of its own safety culture to ensure that it promotes the most effective behaviors in its regulatory activities.

As discussed for Sempra and SoCalGas, CPUC also needs a clear understanding of a systemic approach to safety. This could be facilitated though a collaborative dialogue similar to that used by the U.S. Nuclear Regulatory Commission to develop its Safety Culture Policy and Traits. Such an approach promotes shared learning by the regulator, the regulated community and the public.

Below is a roadmap presented on how the recommendations can be enacted. The order of these recommendations is deliberate. The later ones often depend on the earlier ones having been completed effectively. Some of them can also be done concurrently. Please observe that these suggestions are only examples to provide guidance and inspiration on improvement activities. They should not be used as checklist for corrective actions.

1. Similar to the guidance for Sempra and SoCalGas, conduct externally facilitated dialogues around the concept of safety as understood by the results of the assessment as well as within the organization. Alignment and consistency within the CPUC is critical in its regulatory activities.
2. Conduct an independent assessment of CPUC's own safety culture to establish the current shared understandings and beliefs around safety within its own organization. This culture is a driver of not only its own safety culture but that of its licensees as well.
3. Once aligned, CPUC is encouraged to engage in communication strategies with its licensees around a comprehensive approach to safety and how it will impact its activities going forward. These strategies should include face to face interactions, dialogue sessions, and eventually formalized documents.
4. Benchmarking with other regulators from different industries will be helpful, e.g. U.S. Nuclear Regulator Commission, Federal Aviation Administration, National Transportation Safety Board, Chemical Safety Board,
5. Develop tools for safety culture oversight that also take into account a comprehensive perspective on safety. This tool should be implemented and provided to all inspectors.
6. Perform training on safety culture self-assessment to sharpen the skills in both oversight and assessing safety culture.

Appendix

A: The 2EC Team for the Assessment

B: SoCalGas Safety Culture Perception Survey Results

C: Sempra Safety Culture Perception Survey Results

D: List of Documents Requested for Review

E: Response to OII Questions

EVOLVING ENERGY CONSORTIUM

Appendix A: The 2EC Team for the Assessment

Sonja B. Haber, PhD., President and Executive Consultant Human Performance Analysis

Dr. Haber has over 40 years of experience in the area of organizational safety culture and human performance, the last 30 years focused on improving human performance and safety culture within organizations that must operate with a high degree of reliability. Dr. Haber has a vast experience from leadership and culture work through her field work, both domestically and internationally, as well from commercial, governmental, and regulatory organizations. She has designed, developed, and implemented a methodology to evaluate organization and management influences on organizational safety culture. This methodology has been implemented in over 60 organizations across different industries and in different countries around the world. Currently, Dr. Haber is conducting independent safety culture evaluations at facilities that are under enhanced regulatory oversight because of more than minor events that have occurred. Dr. Haber is consulting and coaching leadership teams in the development and improvement of culture for safety in both commercial and research facilities in the U.S. and abroad.

Monica Haage, Senior Nuclear Safety Specialist, CEO Evolving Energy Consortium 2EC

Ms Haage has over 18 years of practical improvement work in the area of management, leadership and culture for safety, which includes 13 years in international organizations 2EC, OECD-NEA, IAEA and ISS. Her experience covers the sectors of nuclear, aviation, oil & gas. Ms Haage's core competences lays in event investigations, assessments, practical methods and approaches for organizational evolvement, systemic approach to safety, organizational capacity building, change management. Ms Haage was the technical lead for the IAEA Fukushima accident analysis and her team was tasked to identify the underlying human and organizational causes. Ms Haage have been the scientific lead for a number of publications in the area of safety culture, human and organizational factors and stakeholder engagement. In the capacity of technical lead Ms Haage has developed several methodologies related to safety culture, e.g. Country Specific Safety Culture Forum (CSSCF) on how to assess and self-reflect on safety culture from a national context (national culture), Safety Culture Continuous Improvement Process (SCCIP)[18] which entails a training on how to perform safety culture self-assessments She has formal academic background in engineering (production and automation) and social-psychology (leadership and organizational science).

Mark Fleming, PhD., Professor, Saint Mary's University

Dr. Mark Fleming has over 25 years of experience of working with safety critical organizations, including petrochemical, transportation, and nuclear power. He is an internationally recognized expert in safety culture and was the first professor of safety culture. Mark has developed numerous safety culture assessment instruments and improvement frameworks (e.g., Safety Culture Maturity Model). Mark frequently provides guidance to regulators on safety culture assessment and improvement. He has undertaken safety culture assessments in a wide range of organizations.

[18] https://www.iaea.org/services/review-missions/safety-culture-continuous-improvement-process-sccip

Rod Walker, CEO Rod Walker & Associates Consultancy

Rod Walker has 35 yrs. of energy industry technical expertise combined with management & operations experience leading organizations and serving as a trusted advisor to worldwide consulting clients. Mr. Walker's deep natural gas utility experience including management, operations, EH&S, engineering design, system planning/modelling, construction of gas infrastructure and held positions in Operations, Engineering and Management at Atlanta Gas Light Company (now Southern Company Gas). As a consultant, Mr. Walker has performed 30+ Organizational, Management, Due Diligence and Risk Assessments of utilities worldwide, was the team lead partnering with Los Alamos Labs to investigating the impact of the Aliso Canyon event in 2016 on reliability of natural gas and power in the LA basin and has provided technical advisory & expert witness services for States of AR, CA, DE, MA, NJ, RI, and District of Columbia. Mr. Walker has a formal academic background in Civil Engineering and is the author of many white papers and presentations on various natural gas industry topics.

Stanley Deetz, PhD., Professor Emeritus, University of Colorado at Boulder; President, Interaction Design for Innovation

Stan Deetz has had over 40 years of experience conducting organizational culture analyses and designing and implementing cultural change processes across industries and in a variety of countries. He has published widely showing lessons learned in the analysis of organizational culture and developing concepts enhancing organizational change and quality decision making. He has spent seven years working specifically with safety culture in the nuclear industry offering analyses and workshops through the IAEA. He has an interdisciplinary Ph.D. focused on comparative cultures and interaction processes. He is a specialist in the use of soft system methodologies to understand complex organizational processes and events from a systemic perspective. He has written numerous whitepaper reports for commercial organizations and governmental and non-governmental agencies diagnosing complex problems and focusing on stakeholder and collaborative decision-making in developing innovations and mutually satisfying outcomes.

W. Earl Carnes, retired, formerly Senior Advisor High Reliability & Safety Culture, U.S. Department of Energy

Earl Carnes' experience spans over 45 years in private sector & government evaluating & improving safety and performance of scientific and technical organizations. The past 30 years he served in oversight, policy & advisory positions nationally and internationally for U.S. Department of Energy (DOE) focusing on safety management systems, human & organizational factors, safety culture, accident investigation, crisis management and organizational learning. From 2011 to 2015 he was Senior Advisor for the DOE office of independent oversight conducting safety culture assessments at major DOE sites and laboratories in response concerns about safety culture from a DOE Congressional oversight board. Prior to joining DOE, he was in the commercial nuclear with the Institute of Nuclear Power Operations (INPO) and as a management consultant. He authored or contributed to numerous policy and guidance documents for DOE, INPO and the International Atomic Energy Agency. He co-authored the Deepwater Horizon Study Group's Investigation of the Macondo Well Blowout report, and the book Organizing for Reliability: A Guide for Research and Practice (High Reliability and Crisis Management).

Appendix B: SoCalGas Safety Culture Perception Survey Results

Summary

This report presents the results of safety culture perception survey conducted as part of an independent safety culture assessment of SoCalGas. This perception survey is only one of five safety culture assessment methods used and therefore the results cannot be considered alone and were integrated into the overall assessment.

The survey was conducted online using a commercial online survey provider. SoCalGas employees were emailed an individual survey link. There was a high participation rate, with 85% of employees completing the survey. The survey assessed ten safety culture dimensions and two safety behavior scales. The survey also asked a series of demographic questions (e.g., level of seniority) to enable comparisons between groups.

Participants reported very positive perceptions of SoCalGas's safety culture, with the average of all ten dimensions above 4.0 on a five-point scale. Directors and officers reported significantly more positive safety culture perceptions than non-supervisory participants. Unionized participants reported less positive perceptions than unionized employees. Participants from three business units and four work locations reported less positive perceptions than other locations.

The following conclusions were made:

- The vast majority of participants have positive perceptions of SoCalGas's safety culture and report high levels of safety behavior and low levels of at-risk behavior.
- Participants were slightly less positive about
    - the extent to which leadership skills are being developed,
    - items referring to contractors, including being held to the same standard and being involved in decisions,
    - work planning and the extent to which time frames are realistic,
    - ability to challenge decisions and be critical,
    - being recognized for safety conscious behavior,
    - trust between management and staff and between workgroups,
    - the extent to which questioning decisions is encouraged,
    - staffing levels,
    - encouraging co-workers to monitor their safety behavior.
- Directors and officers had significantly (0.5 on a 5-point scale) more positive safety culture perceptions than non-supervisory participants.
- Unionized employees had slightly less positive safety culture perceptions than unionized employees.
- Three business units (aboveground storage, underground storage and gas transmission) had slightly less positive perceptions than other units.
- Four work locations (Aliso Viejo, Fontana, San Luis Obispo, and Visalia) had slightly less positive safety culture perceptions.
- Unionized employees in nine work locations (Aliso Canyon, Aliso Viejo, Fontana, Glendale, Monterey Park, Palm Desert, Pico Rivera, Redondo Beach (182nd St. Base) and Visalia) had less positive perceptions than the SoCalGas average.
- Unionized employees at Aliso Canyon had the least positive perceptions of all locations.

Introduction

This report summarizes the results of the SoCalGas safety culture perception survey. This perception survey was conducted as part of an independent safety culture assessment, which was ordered by OII. It is important to note that the results presented in this report need to be considered within the context of the overall assessment.

Method

The online survey was conducted using a commercial survey provider. SoCalGas provided email addresses for their employees and individual survey links were sent directly from the 2EC team to 8072 employees. Email reminders were sent to employees to encourage them to participate in the survey. In total 6841 employees completed the survey, which is an excellent response rate of 85%. While the overall response rate was high, some departments were lower, for example the response rate for Infrastructure was 70%, which was due to a lower response rate from non-managerial staff. Four departments had response rates below 60% (see table 1), which accounts for the lower response rate. The lower response rate for these departments may be due to challenges for these employees to complete the online survey, although it is unclear why these groups were different than others. Alternatively, the lower response rate may reflect a lack of willingness of staff to participate.

Table 1: Departments with lower response rates from non-management staff

Construction (includes Line 1600)	56%
Distribution Planning and Project Management	52%
Gas System Integrity Staff & Programs	53%
Gas Transmission Operations	59%

Table 2 presents the percentage of the sample for each employment category. The sample is representative of the SoCalGas, as most of the participants were non-supervisory staff.

Table 2: Percentage of the sample from each employment category

Officer or director	1.4%
Manager	8.9%
Supervisor	13.4%
Non-Supervisor	76.4%

Nearly two thirds of supervisory and non-supervisory participants reported that they were represented by a union (see table 2).

Table 3: Union membership

Yes	64.8%
No	33.8%
Don't know	1.4%

The survey assessed the 10 NRC safety culture dimensions, (Leadership safety values and actions; Problem identification and resolution; Personal accountability; Work processes; Continuous learning; Environment for raising concerns; Effective safety communication; Respectful work environment; Questioning attitude; Decision making) and safety and risk-taking behavior scales. The psychometric properties of these scales have been evaluated and all the scales demonstrate good internal reliability. Participants indicated the extent to which they agreed with each of the statements, from strongly disagree to strongly agree.

In line with best practice for online surveys, three attention check items were included in the survey. These items were used to identify participants who were not paying attention to the survey. The three items used and the percentage who responded to each option are presented in table 3 below. Only participants who disagreed or respond don't know to the three items are included in the results presented.

Table 4: Attention check items

Attention check	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know
I am responding to this survey without reading the statements	79.3%	11.0%	2.3%	2.6%	3.1%	1.7%
I am responding randomly to this survey	77.4%	10.3%	3.0%	4.2%	3.3%	1.8%
I am not paying attention while responding to this survey	85.0%	9.5%	1.4%	1.4%	1.7%	1.0%

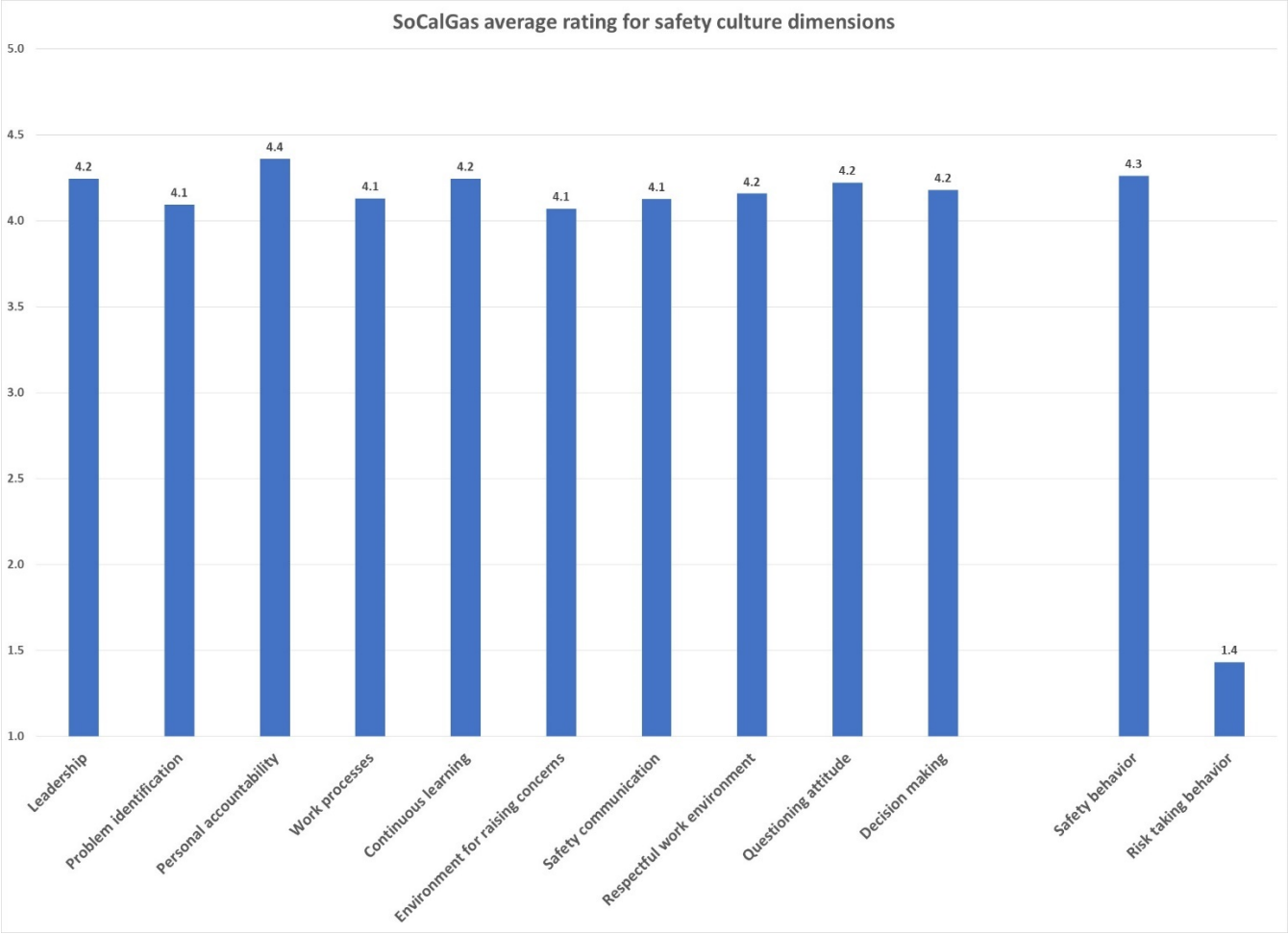
Results

The overall results of the safety culture perception survey will be presented initially, followed by an examination of the differences between groups, such as management and non-management staff.

Average score for safety culture dimensions

The average score for the 10 safety culture dimensions and the two safety behavior scales are presented in figure 1. The average scores for the safety culture dimensions are all within a narrow range between 4.1 and 4.4 on a five-point scale, where five represents strongly agree. Participants also reported high levels of safety behavior (4.3 on a five-point scale) and low levels of at risk behavior (1.4 on a five point scale). Therefore, the vast majority of participants reported positive perceptions of the safety culture at SoCalGas. Detailed descriptive statistics for each dimension are provided below.

Figure 1: Overall average for each safety culture dimension and safety behavior scales



Detailed analysis for each dimension

To provide a comprehensive description of employee responses the level of agreement with the items from each dimension is provided.

The leadership safety values and actions dimension contains 11 items that assess participants perception of leadership commitment to safety. Table 5 provides participants responses to each item from the leadership safety values and actions dimension.

Table 5: Level of agreement with leadership safety values and actions items

Leadership safety values and actions	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know[19]	Average
SoCalGas management makes safety the overriding priority	1.2%	2.5%	8.5%	37.6%	49.3%	1.0%	4.3
SoCalGas management ensures that leadership skills are systematically developed	2.5%	6.9%	20.4%	36.4%	27.8%	6.1%	3.9
SoCalGas management establishes clear safety expectations	0.6%	1.4%	5.6%	40.3%	51.6%	0.5%	4.4
SoCalGas management is visibly present in the workplace	1.8%	3.1%	10.2%	40.9%	40.6%	3.4%	4.2
My direct supervisor has good leadership skills	1.7%	2.8%	8.1%	30.8%	55.7%	0.7%	4.4
My direct supervisor helps our team to adapt to change	1.1%	2.9%	9.8%	36.6%	48.6%	1.0%	4.3
My direct supervisor helps resolve difficult issues between teams	1.3%	2.6%	10.7%	34.3%	46.1%	5.0%	4.3
My direct supervisor involves us when making decisions	3.2%	6.6%	18.2%	32.7%	36.5%	2.9%	4.0
My direct supervisor is responsive to safety concerns	0.7%	1.1%	5.4%	32.2%	59.4%	1.3%	4.5
SoCalGas management supports my direct supervisor in upholding safety standards	0.9%	1.7%	9.7%	35.9%	44.9%	6.8%	4.3
SoCalGas management is visibly present in the field	1.8%	4.8%	16.0%	31.9%	26.6%	19.0%	4.0

Participants report positive perceptions of leadership commitment to safety with average scores for each item above 4, with the exception of one item which had an average of 3.9, which referred to the development of leadership skills. One in ten participants disagreed with this item. Participants were generally more positive about items referring to their direct supervisor, with a number of items above 4.3. The lowest rated item (4.0) about direct supervisor refers to involvement in decision making, with one in ten participants disagreeing with this statement.

The problem identification and resolution dimension contains five items, that asses perceptions of how SoCalGas identifies and resolves problems. Participants report positive perceptions of SoCalGas's processes for identifying and resolving problems, with all items average scores above 4.

[19] Don't know option was excluded when calculating averages.

Table 6: Problem identification and resolution items

Problem identification and resolution	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
Internal assessments helps us improve our safety performance	1.0%	2.6%	11.8%	42.6%	36.8%	5.1%	4.2
We at SoCalGas use operating experience to improve	1.1%	1.6%	9.5%	44.5%	38.3%	5.0%	4.2
SoCalGas incident investigations are effective	1.9%	3.9%	15.7%	34.0%	27.4%	17.0%	4.0
SoCalGas corrective actions are effective	1.3%	3.8%	18.0%	39.5%	27.7%	9.7%	4.0
SoCalGas performance indicators help us to improve	1.5%	3.9%	15.7%	41.6%	32.4%	4.8%	4.0

It is worth noting that a relatively large percentage (17%) of participants selected Don't know[20] for the item referring to the effectiveness of incident investigations. This may be due to a lack of familiarity with the incident investigation process.

The personal accountability dimension contains eight items and assesses perceptions of the extent to which safety responsibilities are clearly defined, people understand their responsibility and meet those expectations. Participants report positive perceptions of personal accountability, with all items except one being above 4.3.

Table 7: Personal accountability items

Personal accountability	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
We at SoCalGas accept ownership for safety	0.8%	1.4%	5.6%	40.0%	51.0%	1.3%	4.4
Safety expectations are clearly defined	0.6%	1.2%	5.3%	40.9%	51.8%	0.4%	4.4
We at SoCalGas encourage each other to work safely	0.4%	0.9%	4.4%	37.5%	56.4%	0.4%	4.5
We at SoCalGas follow safety rules	0.4%	1.0%	3.8%	36.9%	57.1%	0.8%	4.5
We at SoCalGas understand our assigned tasks	0.4%	1.5%	5.3%	50.0%	42.5%	0.3%	4.3
Contractors are held to the same standard as other employees	3.9%	5.1%	14.8%	23.8%	25.7%	26.8%	3.9
We at SoCalGas adhere to procedures	0.3%	1.4%	4.4%	44.4%	49.0%	0.5%	4.4

[20] Don't know option was excluded when calculating averages.

Personal accountability	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
Safety responsibilities are clearly defined	0.2%	1.3%	5.2%	44.2%	48.3%	0.8%	4.4

The item referring to contactors being held accountable received the lowest average score (3.9) with one in ten participants disagreeing with this item. In addition, over a quarter of participants selected Don't know for this item. The high percentage of Don't know responses, likely reflects a lack of interaction with contractors.

The work processes dimension contains six items, assessing perceptions of planning, procedures and processes. Participants had positive perceptions of work process with most items receiving an average score above 4, with the exception of two items referring to planning.

Table 8: Work processes items

Work processes	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
We at SoCalGas have enough authority to perform our work safely	0.7%	1.4%	5.3%	47.3%	44.2%	1.1%	4.3
SoCalGas work processes are effective	1.2%	3.5%	13.1%	50.3%	30.4%	1.6%	4.1
SoCalGas has high quality procedures	0.6%	1.7%	10.0%	46.4%	40.0%	1.2%	4.3
SoCalGas has high quality documentation	1.1%	3.3%	13.4%	44.1%	33.8%	4.3%	4.1
Work is well planned	3.1%	7.1%	18.4%	44.3%	25.8%	1.3%	3.8
Work plans are realistic	2.1%	6.2%	16.1%	47.3%	26.1%	2.2%	3.9
Physical working conditions are good	1.0%	2.3%	8.9%	47.2%	38.0%	2.6%	4.2

Nearly one in ten participants disagree with the two items referring to planning, therefore a small proportion of participants have concerns about the way work is planned.

The continuous learning dimension contains six items, assessing perceptions of SoCalGas's systems for learning and improving. Participants had positive perceptions of this dimension, with the average score for each above 4.1.

Table 9: Continuous learning items

Continuous learning	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
We at SoCalGas work to improve safety procedures	0.6%	1.5%	5.8%	37.3%	53.9%	0.9%	4.4
There are adequate resources to maintain competence	1.9%	5.5%	11.9%	43.9%	34.7%	2.2%	4.1
We at SoCalGas value independent views of our safety performance	1.3%	2.9%	13.4%	38.7%	39.8%	3.9%	4.2
We at SoCalGas have regular opportunities to develop our skills	1.5%	5.1%	11.0%	41.7%	40.0%	0.7%	4.2
Safety assessments help SoCalGas improve	0.8%	1.9%	9.0%	39.3%	46.9%	2.1%	4.3
SoCalGas's training programs helps us improve	1.3%	2.3%	8.0%	42.9%	44.5%	0.9%	4.3

Environment for raising concerns dimension contains seven items, assessing perceptions of the reaction to raising a concern. Participants had positive perception of the reaction to raising concerns with five of the seven items having a average score of above 4.0.

Table 10: Environment for raising concerns items

Environment for raising concerns	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
I am responsible for identifying problems	0.6%	0.9%	6.1%	45.8%	45.6%	1.1%	4.4
I can openly challenge decisions made by management	4.8%	10.6%	25.8%	34.6%	21.0%	3.3%	3.6
I feel free to approach management with any concerns I have	2.0%	4.6%	9.1%	42.8%	41.1%	0.4%	4.2
SoCalGas management wants concerns reported and willingly listens to problems	1.7%	4.4%	12.4%	42.6%	36.9%	1.9%	4.1
SoCalGas management ensures any concerns raised are addressed	2.1%	4.9%	13.7%	43.6%	32.8%	3.0%	4.0
Helpful criticism is encouraged	1.8%	5.5%	18.9%	43.2%	28.3%	2.3%	3.9
SoCalGas management does not tolerate retaliation of any kind for raising concerns	2.6%	3.5%	12.1%	33.6%	42.4%	5.8%	4.2

Participants were less positive about the extent to which criticism was encouraged, with an average score of 3.9. The ability to openly challenge decisions made by management received the least positive response of all the safety culture items with an average score of 3.6, with only 55% of participants actively agreeing with this item.

The effective safety communication dimension contains six items, assessing perceptions of the effectiveness of SoCalGas's safety communication systems. Participants have positive perceptions of safety communication with four of the six items rated above 4.0.

Table 11: Effective safety communication items

Effective safety communication	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
The overriding priority of safety is clearly communicated	1.0%	2.0%	6.1%	34.3%	55.7%	0.9%	4.4
Information is effectively communicated across teams	2.9%	7.7%	13.4%	41.8%	33.1%	1.0%	4.0
My direct supervisor communicates effectively about safety	0.9%	1.6%	5.2%	30.2%	61.1%	1.0%	4.5
SoCalGas management communicates effectively about safety	0.7%	2.1%	6.5%	40.7%	49.6%	0.5%	4.4
Employees are recognized for safety conscious behaviors	3.4%	8.3%	17.9%	35.7%	30.6%	4.1%	3.9
Contractors are involved in safety discussions	3.2%	5.3%	19.1%	20.3%	17.6%	34.4%	3.7

Just over one in three participants did not agree that employees were recognized for safety conscious behaviors. A third of participants reported that they did not know that contractors were involved in safety discussions.

The respectful work environment dimension contains eight items, assessing perceived levels of respect, collaboration, and trust. Participants have positive perceptions of the level of respect and trust within SoCalGas, with six of the eight items receiving a score above 4.2.

Table 12: Respectful work environment items

Respectful work environment	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
There is a high level of trust between workgroups	2.7%	7.5%	19.8%	41.1%	25.8%	3.1%	3.8
Employees are treated with respect	1.6%	3.5%	9.1%	41.2%	44.3%	0.3%	4.2
Employees take pride in their work	0.8%	2.6%	9.6%	43.6%	42.2%	1.2%	4.3
Employees support each other	0.9%	2.5%	8.1%	45.6%	42.4%	0.5%	4.3

Respectful work environment	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
Employees work together effectively to solve common problems	0.9%	2.4%	8.1%	47.4%	40.3%	0.8%	4.3
There is a high level of trust between management and employees	3.4%	7.7%	19.3%	39.5%	27.7%	2.4%	3.8
There is a high level of trust between my supervisor and my workgroup	1.8%	3.9%	9.8%	37.0%	46.0%	1.6%	4.2
There is a high level of trust within my workgroup	1.6%	3.5%	9.2%	40.2%	44.1%	1.3%	4.2

One in ten participants disagreed with items referring to trust between workgroups and between employees and management.

The questioning attitude dimension contains six items, assessing perceptions of the extent to which questioning decisions or adopting a cautious approach is encouraged. Participants have positive perceptions of the extent to which they are encouraged to adopt a cautious and questioning approach, with five of the six items receiving a score above 4.2. Participants were less positive about questioning decisions, with one in ten disagreeing with this item.

Table 13: Questioning attitude items

Questioning attitude	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
I feel free to report mistakes	1.6%	3.3%	10.2%	44.1%	40.3%	0.5%	4.2
I feel free to ask questions about any issue	1.6%	3.9%	8.2%	41.2%	44.7%	0.3%	4.2
We at SoCalGas are encouraged to report problems that impact performance	1.3%	2.9%	9.0%	42.5%	43.3%	1.0%	4.3
We at SoCalGas openly share lessons learned when permissible	1.0%	2.7%	9.3%	43.5%	41.5%	2.0%	4.2
I feel free to question decisions	3.2%	6.9%	15.9%	41.8%	31.5%	0.7%	3.9
I feel free to stop the job when uncertain	1.0%	1.8%	5.7%	34.4%	53.3%	3.8%	4.4

The decision-making dimension contains six items, assessing perceptions of the extent to which SoCalGas's decision support systems reflect safety as the overriding priority. Participants had positive perceptions of decision-making, with only one item receiving an average score below 4.0. Over a third of participants did not agree that staffing levels reflected safety as the overriding priority.

Table 14: Decision making items

Decision making	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
SoCalGas's strategic plans reflect safety as the overriding priority	1.2%	2.4%	9.9%	37.0%	46.9%	2.6%	4.3
SoCalGas's staffing levels reflect safety as the overriding priority	5.6%	9.7%	16.8%	33.4%	29.3%	5.2%	3.8
SoCalGas's documentation reflects safety as the overriding priority	0.8%	1.7%	8.5%	37.4%	49.1%	2.4%	4.4
SoCalGas's decisions reflect safety as the overriding priority	1.4%	3.6%	8.4%	36.7%	48.6%	1.2%	4.3
SoCalGas's response to safety concerns shows that safety is the overriding priority	1.3%	3.1%	7.4%	34.5%	52.6%	1.2%	4.4
The way resources are allocated shows that safety is the overriding priority	2.5%	6.4%	14.2%	36.8%	35.9%	4.3%	4.0

The safety culture perception survey also contained self-report safety behavior scales, one assessing safety behavior and a second assessing risk taking behavior. Participants responded by indicating how frequently they performed the specific behavior on a five-point scale from never to very often.

The safety behavior scale contains nine items, assessing the frequency at which participants perform safety behaviors. Participants report frequently performing safe behaviors, with all the behaviors except one receiving a score of 4.0 or above. The behavior with the lowest score (3.5) was encouraging co-workers to monitor their safety behavior.

Table 15: Safety behavior items

Safety behavior	Never	Rarely	Sometimes	Often	Very often	NA	Average
Talk positively about safety	0.2%	2.0%	14.3%	37.6%	44.5%	1.4%	4.3
Actively engaging in safety activities	1.2%	5.3%	20.2%	34.5%	35.5%	3.3%	4.0
Report hazards I observe	0.5%	2.8%	10.6%	32.9%	42.7%	10.5%	4.3
Follow safety rules and procedures	0.1%	0.1%	0.5%	19.2%	79.4%	0.6%	4.8
Encourage co-workers to monitor my safety behavior	9.7%	11.7%	17.4%	22.8%	23.8%	14.5%	3.5
Intervene every time I think someone is in an unsafe situation	0.9%	5.0%	13.4%	28.0%	40.1%	12.6%	4.2
Make sure the people I work with know my safety expectations	3.0%	5.3%	12.3%	29.6%	40.6%	9.2%	4.1
Encourage safe working by setting a good example	0.3%	0.4%	4.3%	31.0%	61.7%	2.4%	4.6

Safety behavior	Never	Rarely	Sometimes	Often	Very often	NA	Average
Communicate clearly about safety	0.8%	2.6%	11.3%	33.9%	47.4%	4.0%	4.3

The risk-taking behavior scale contains three items, assessing the frequency that participants report performing at risk behaviors. Participants report very low levels of risk-taking behavior, which the vast majority selecting never for the three items. One in five participants reported that the were at least sometimes cynical about safety.

Table 16: Risk taking behavior items

Risk taking behavior	Never	Rarely	Sometimes	Often	Very often	NA	Average
Take short cuts to get the job done	73.3%	20.1%	3.0%	0.6%	0.6%	2.4%	1.3
Bend the rules to get a job done	82.2%	13.1%	1.7%	0.5%	0.6%	2.0%	1.2
Be cynical about safety	61.9%	10.6%	6.4%	6.9%	6.9%	7.3%	1.8

Open comments

Survey participants were provided with an opportunity to provide additional comments. In total 1589 participants provided a comment. Each comment was reviewed and categorized. Table 17 below provides a summary of the high-level categories.

Table 17: Number of comments for high level categories

Category	Number of comments
Negative (e.g., I feel that we are rushed to complete jobs, I also do not feel that training is adequate.)	546
Positive (e.g., This is a great company to work for, very safety driven.)	424
No comment (e.g., No additional comments)	389
Survey (e.g., I chuckled at all the "I'm not reading these questions" options.)	177
Neutral (e.g., Because I have a desk job, some of the questions did not necessarily apply to me.)	53
Total	**1589**

The positive and negative we categorized into the ten safety culture dimensions. Table 18 below presents the number of comments for each dimension. Leadership had by far the largest number of both positive and negative comments.

Table 18: Number of positive and negative comments for the ten safety culture dimensions

Safety Culture dimension	Positive	Negative	Total
Leadership safety values and actions:	299	308	607
Problem identification and resolution:	1	14	15
Personal accountability:	64	23	87
Work processes:	2	45	47
Continuous learning	6	45	51
Environment for raising concerns:	4	24	28
Effective safety communication:	3	32	35
Respectful work environment:	45	53	98
Questioning attitude:	0	2	2
Decision making:	0	2	2

Differences between groups

Statistical analysis was performed on the data set to identify differences in the perceptions between groups of participants (e.g., managers versus non supervisors). Since the data set is large, small differences between groups were statistically significant. Therefore, only differences that are both statistically and meaningfully different will be discussed.

Figure 2 below presents the average score on the ten safety culture dimensions and the safety behavior scales for directors, managers, supervisors and non-supervisors. Directors have the most positive perceptions of the safety culture, with their average score above 4.6 on all the dimensions. Directors' perceptions are significantly different from non-supervisors. Managers and supervisors have very similar perceptions to each other and are only slightly more positive than non-supervisors.

Directors, managers and supervisors report similar levels of safety behavior, which is significantly higher than non-supervisors. Directors report the lowest levels of risk-taking behavior and this is significantly lower than non-supervisors.

Figure 2: Differences between directors, managers, supervisors, and non-supervisors

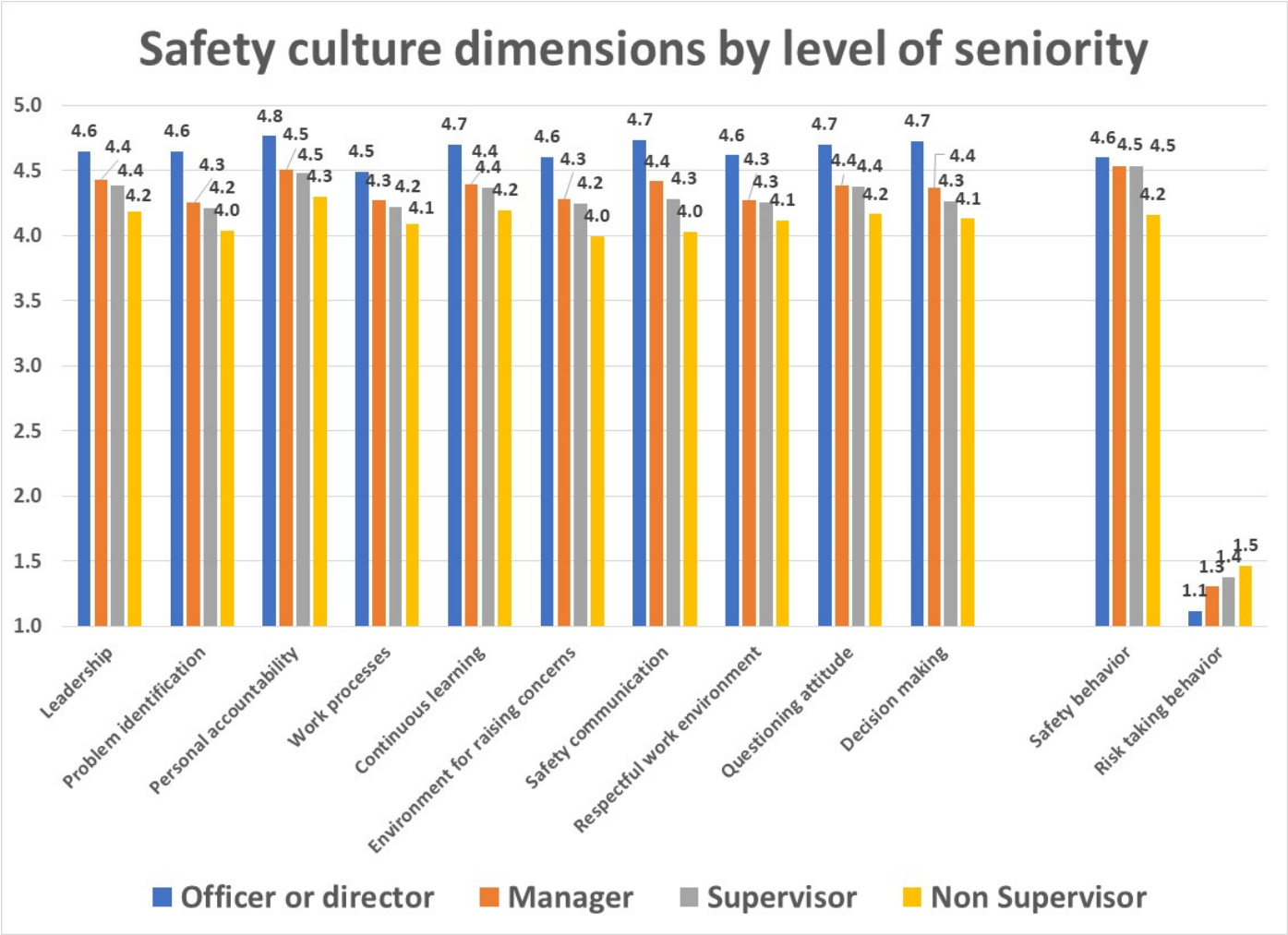
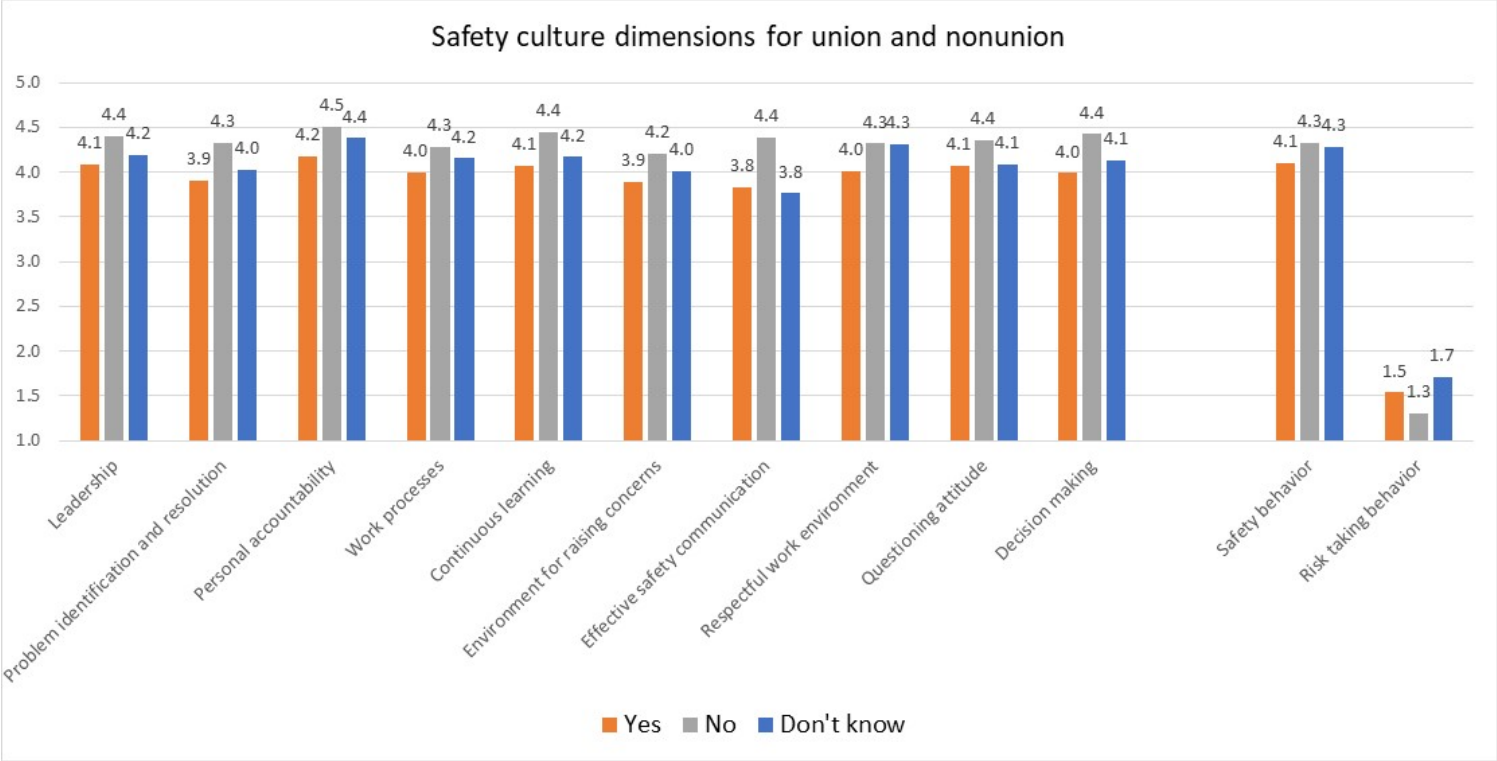


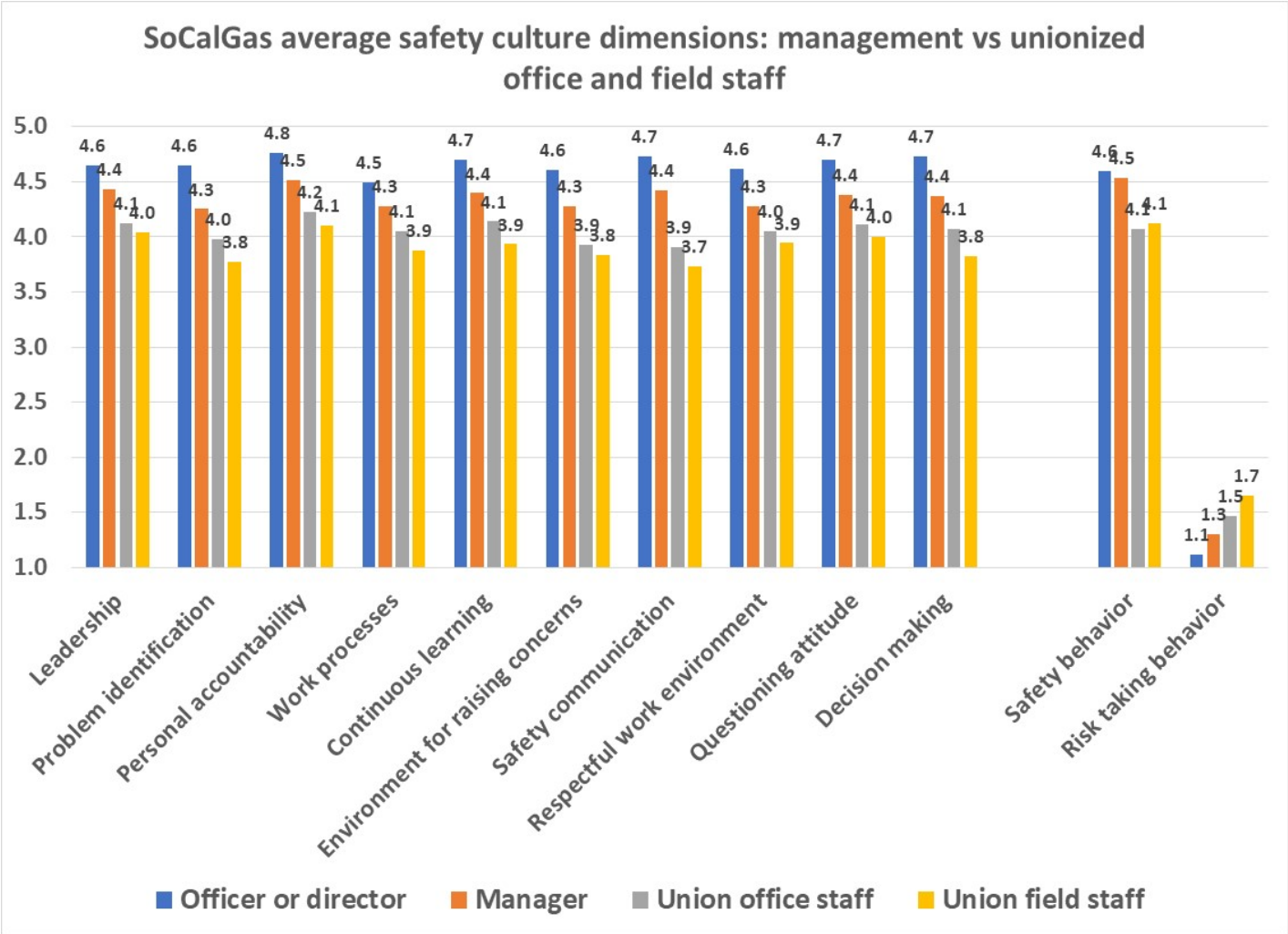
Figure 3 below presents the average scores of union and nonunion employees (don't know is also included). Unionized participants reported less positive perceptions than nonunionized participants on all the safety culture dimensions. Unionized employees were significantly less positive about effective safety communication, problem identification and resolution and decision making.

Figure 3: Differences between union and non-union members



To further explore differences based on occupational group. Participants work location was used to categorize participants as either field or office based. Figure 4 below presents the average scores for directors, managers, unionized office staff and unionized field staff. Unionized participants reported less positive perceptions than directors and managers on all the safety culture dimensions. Unionized field staff had the lowest scores, with the majority below 4.0, they were significantly less positive about effective safety communication, problem identification and resolution and decision making. The large gap (a full scale point) between the perceptions of directors and unionized staff is a concern, as they appear to be living in different worlds.

Figure 4: Differences between Directors, Managers, unionized field and unionized office staff



The average for the ten safety culture dimensions for supervisors and non-supervisors[21] was calculated for each business unit. The average for each unit is presented in table 19 in the appendix. Business units with less than 30[22] responses were excluded. The majority of business units were above 4.0 for the ten safety culture dimensions. Three business units (aboveground storage, underground storage and gas transmission) had over five dimensions below 4.0[23].

The average for the ten safety culture dimensions for supervisors and non-supervisors was calculated for each work location. The average for each location is presented in table 20 in the appendix. Work locations with less than 30 responses were excluded. The majority of work locations were above 4.0 for the ten safety culture dimensions. Four locations (Aliso Viejo, Fontana, San Luis Obispo, and Visalia) had over five dimensions below 4.0

[21] Detailed business unit membership was not collected from managers or directors as it would make it possible to identify their individual responses.
[22] 30 is the accepted cut off to ensure the results are reliable and not distorted by one outlier score.
[23] It was not possible to test the statistical significance of the differences between these groups due to the large number of groups.

The average for the ten safety culture dimensions for unionized workers was calculated for each work location. The average for each location is presented in table 21 in the appendix. Although the majority of work locations still had averages above 4.0, many averages were below 4.0. Nine locations (Aliso Canyon, Aliso Viejo, Fontana, Glendale, Monterey Park, Palm Desert, Pico Rivera, Redondo Beach (182nd St. Base) and Visalia) had over five dimensions below 4.0. At Aliso Canyon all ten dimensions were below 4.0 and problem identification and resolution was 3.5, which is half a scale point below the overall average for SoCalGas.

Conclusions

A very high proportion (85%) of SoCalGas employees completed the safety culture perception survey, which is an indication of their commitment to safety and the effort of SoCalGas management. This high response rate increases the validity of the survey results as there is less concern about response bias. The following general conclusions can be drawn from the results:

- The vast majority of participants have positive perceptions of SoCalGas's safety culture and report high levels of safety behavior and low levels of at-risk behavior.
- Participants were slightly less positive about
    - the extent to which leadership skills are being developed,
    - items referring to contractors, including being held to the same standard and being involved in decisions,
    - work planning and the extent to which time frames are realistic,
    - ability to challenge decisions and be critical,
    - being recognized for safety conscious behavior,
    - trust between management and staff and between workgroups,
    - the extent to which questioning decisions is encouraged,
    - staffing levels,
    - encouraging co-workers to monitor their safety behavior.
- Directors and officers had significantly (0.5 on a 5-point scale) more positive safety culture perceptions than non-supervisory participants.
- Unionized employees had slightly less positive safety culture perceptions than unionized employees.
- Three business units (aboveground storage, underground storage and gas transmission) had slightly less positive perceptions than other units.
- Four work locations (Aliso Viejo, Fontana, San Luis Obispo, and Visalia) had slightly less positive safety culture perceptions.
- Unionized employees in nine work locations (Aliso Canyon, Aliso Viejo, Fontana, Glendale, Monterey Park, Palm Desert, Pico Rivera, Redondo Beach (182nd St. Base) and Visalia) had less positive perceptions than the SoCalGas average.
- Unionized employees at Aliso Canyon had the least positive perceptions of all locations.

Detailed group comparison statistics

Table 19: Average scores for supervisors and non-supervisors for each business unit[24]

Primary business function	Leadership	Problem identification and resolution	Personal accountability	Work processes	Continuous learning	Environment for raising concerns	Effective safety communication	Respectful work environment	Questioning attitude	Decision making
Administrative & Diversity (excluding Inventory & Logistics, Support Services, and Supply Management)	4.4	4.3	4.4	4.2	4.4	4.0	4.3	4.2	4.3	4.4
Inventory & Logistics	4.3	3.9	4.2	3.9	4.1	4.1	3.8	4.0	4.2	3.8
Support Services	4.1	4.0	4.2	4.0	4.1	3.9	4.1	4.0	4.1	3.9
Supply Management	4.3	4.1	4.3	4.0	4.4	4.2	4.2	4.2	4.3	4.2
SCG Systems & Tech – Gas Ops	4.0	3.9	4.3	4.1	4.2	4.0	4.0	4.0	4.1	3.9
SCG Systems & Tech - Customer	4.3	4.2	4.5	4.2	4.4	4.2	4.3	4.3	4.3	4.3
Safety Management System	4.4	4.3	4.5	4.2	4.4	4.3	4.4	4.3	4.3	4.3
Customer Solutions	4.3	4.2	4.4	4.2	4.4	4.0	4.3	4.2	4.2	4.4
Customer Services (Staff, Admin, Financial Analysis, CIS)	4.4	4.3	4.5	4.4	4.4	4.3	4.3	4.3	4.5	4.4
Remittance Processing/Branch Offices	4.3	4.2	4.4	4.3	4.3	4.0	4.2	4.1	4.2	4.3
Customer Service - Southeast Region	4.3	4.1	4.3	4.1	4.2	4.1	4.1	4.2	4.2	4.2
Customer Service - Northwest Region	4.2	4.0	4.3	4.1	4.2	4.0	3.9	4.1	4.2	4.1
Customer Contact Centers	4.1	4.1	4.3	4.2	4.2	3.9	4.0	4.0	4.1	4.2
Customer Operations	4.2	4.1	4.5	4.1	4.3	4.0	4.0	4.1	4.1	4.2
Human Resources	4.5	4.4	4.6	4.4	4.5	4.3	4.5	4.4	4.4	4.5
Aboveground Storage	4.1	3.8	4.1	3.9	4.0	3.9	3.9	3.9	4.1	4.0
Underground Storage	4.0	3.8	4.1	3.8	4.0	3.7	4.0	3.8	3.9	3.9
Gas Transmission Operations	4.0	3.8	4.1	3.9	3.9	3.9	3.9	4.0	4.1	3.8
Gas Control & System Planning	4.3	4.2	4.5	4.1	4.5	4.2	4.2	4.3	4.4	4.4

[24] Averages are only presented for groups with more than 30 responses.

Primary business function	Leadership	Problem identification and resolution	Personal accountability	Work processes	Continuous learning	Environment for raising concerns	Effective safety communication	Respectful work environment	Questioning attitude	Decision making
Infrastructure (Transmission & Storage Strategy, Control Center Modernization, Admin, Hydrogen Blending Strategy)	4.2	4.0	4.3	4.0	4.2	4.2	4.0	4.1	4.2	4.1
Integrity Management & Strategic Planning	4.5	4.4	4.5	4.3	4.4	4.3	4.4	4.4	4.4	4.4
Gas Engineering	4.3	4.1	4.4	4.1	4.3	4.1	4.3	4.2	4.2	4.4
Gas System Integrity Staff & Programs	4.4	4.3	4.5	4.3	4.5	4.2	4.3	4.2	4.4	4.3
Integrity Management	4.5	4.5	4.6	4.3	4.5	4.4	4.5	4.5	4.5	4.5
Construction (includes Line 1600)	4.3	4.2	4.5	4.2	4.4	4.2	4.3	4.3	4.3	4.3
Distribution PMO & Resource Mgmt	4.2	4.2	4.4	4.3	4.4	4.0	4.2	4.2	4.2	4.2
Distribution Planning and Project Mgmt	4.1	3.9	4.3	4.1	4.1	4.0	4.0	4.0	4.1	4.1
Gas Ops - Southeast Region	4.2	3.9	4.2	4.0	4.1	3.9	3.9	4.1	4.1	4.0
Gas Ops - Northwest Region	4.2	4.0	4.3	3.9	4.1	4.0	3.9	4.0	4.1	3.9
Communications, Local Govt. & Community Affairs	4.4	4.3	4.5	4.2	4.5	3.9	4.3	4.2	4.3	4.6
Strategy, Sustainability, & Environmental and Risk Management	4.3	4.3	4.4	4.2	4.3	4.1	4.3	4.3	4.3	4.3
Other	4.3	4.1	4.3	4.2	4.3	4.0	4.1	4.1	4.2	4.2
Overall average	**4.2**	**4.1**	**4.3**	**4.1**	**4.2**	**4.0**	**4.1**	**4.1**	**4.2**	**4.2**

Table 20: Average scores for supervisors and non-supervisors for each work location[25]

Primary work location	Leadership	Problem identification and resolution	Personal accountability	Work processes	Continuous learning	Environment for raising concerns	Effective safety communication	Respectful work environment	Questioning attitude	Decision making
Alhambra	4.2	4.0	4.2	4.0	4.1	4.1	4.1	4.0	4.2	4.1
Aliso Canyon	4.1	3.9	4.2	3.9	4.0	3.9	4.0	3.9	4.0	4.0
Aliso Viejo	4.1	3.8	4.2	3.9	3.9	3.9	3.8	4.1	4.1	3.8
Anaheim	4.1	4.0	4.3	4.1	4.3	4.0	4.1	4.1	4.2	4.2
Azusa	4.2	4.0	4.3	4.1	4.1	4.1	3.9	4.1	4.1	4.0
Bakersfield	4.2	4.0	4.3	4.1	4.2	4.0	4.0	4.1	4.2	4.0
Beaumont	4.2	3.9	4.3	4.1	4.1	3.9	4.0	4.0	4.2	4.0
Belvedere	4.4	4.2	4.4	4.2	4.3	4.2	4.3	4.4	4.5	4.2
Branford	4.4	4.3	4.5	4.3	4.5	4.3	4.3	4.3	4.5	4.5
Canoga	4.4	4.1	4.4	4.2	4.2	4.2	4.0	4.3	4.3	4.1
Chatsworth	4.4	4.4	4.5	4.3	4.4	4.2	4.3	4.3	4.4	4.3
Chino	4.4	4.1	4.4	4.2	4.4	4.2	4.2	4.3	4.3	4.3
Compton	4.2	4.0	4.3	4.1	4.2	4.0	4.0	4.1	4.3	4.1
Corona	4.2	3.8	4.3	4.0	4.1	4.0	4.1	4.2	4.2	4.1
Crenshaw	4.0	4.0	4.3	4.1	4.2	3.9	3.9	4.1	4.1	4.0
Downey ERC	4.4	4.1	4.6	4.3	4.4	4.0	4.3	4.2	4.3	4.5
Downey Base	4.2	4.0	4.4	4.0	4.1	4.0	3.9	4.2	4.1	4.2
Fontana	4.1	3.9	4.2	4.0	3.9	3.9	3.8	4.0	4.1	3.8
Garden Grove	4.3	4.2	4.3	4.2	4.3	4.1	4.1	4.3	4.3	4.2
Gas Co Tower	4.4	4.3	4.5	4.3	4.4	4.2	4.4	4.3	4.4	4.4
Glendale	4.1	3.9	4.1	4.0	4.1	4.0	3.9	4.0	4.2	4.1
Hollywood	4.2	4.0	4.3	4.0	4.3	4.0	4.0	4.1	4.2	4.2
Honor Rancho	3.7	3.3	3.6	3.6	3.6	3.4	3.2	3.4	3.5	3.5
Huntington Park	4.4	4.1	4.3	4.1	4.3	4.2	4.0	4.2	4.4	4.2
Industry	4.4	4.1	4.4	4.2	4.2	4.2	4.1	4.3	4.3	4.3

[25] Averages are only presented for groups with more than 30 responses.

Primary work location	Leadership	Problem identification and resolution	Personal accountability	Work processes	Continuous learning	Environment for raising concerns	Effective safety communication	Respectful work environment	Questioning attitude	Decision making
Juanita	4.2	4.1	4.2	4.1	4.2	4.2	3.9	4.1	4.1	4.1
La Jolla St	4.3	3.8	4.3	4.0	4.3	4.1	4.1	4.2	4.2	4.1
Lancaster	4.2	4.0	4.2	4.0	4.2	4.0	4.1	4.1	4.3	4.2
Monterey Park	4.2	4.1	4.4	4.2	4.3	4.0	4.1	4.0	4.2	4.2
Murrieta	4.1	3.8	4.3	3.9	4.1	3.9	4.0	3.9	4.1	4.1
Oxnard	4.2	4.0	4.2	4.0	4.1	4.1	3.9	4.1	4.3	4.0
Palm Desert	4.0	3.9	4.2	4.0	4.1	3.9	3.8	4.1	4.0	4.0
Pasadena	4.2	4.1	4.3	4.1	4.2	4.1	4.1	4.3	4.2	4.1
Pico Rivera	4.2	4.1	4.3	4.1	4.3	4.0	4.1	4.1	4.2	4.1
Playa Del Rey	4.3	4.1	4.3	4.1	4.3	4.0	4.2	4.1	4.1	4.2
Ramona	4.5	4.3	4.5	4.3	4.4	4.1	4.0	4.3	4.3	4.3
Redlands	4.3	4.2	4.4	4.3	4.3	4.0	4.2	4.1	4.2	4.3
Redondo Beach	4.0	4.0	4.2	3.9	4.1	3.8	3.6	4.0	3.9	4.0
Riverside	4.4	4.1	4.4	4.2	4.3	4.2	4.2	4.3	4.4	4.3
San Bernardino	4.2	4.1	4.3	4.1	4.2	4.1	4.1	4.2	4.3	4.1
San Dimas	4.1	4.1	4.3	4.2	4.2	3.9	4.0	4.1	4.1	4.1
San Luis Obispo	4.0	3.4	4.2	3.8	3.9	3.9	3.8	4.1	4.0	3.8
San Pedro	4.3	4.2	4.3	4.0	4.1	4.1	3.8	4.2	4.3	4.2
Santa Ana	4.2	3.9	4.3	4.1	4.1	4.0	3.8	4.1	4.2	4.2
Santa Maria	4.1	4.0	4.2	3.9	4.1	4.0	3.9	4.1	4.1	3.9
Santa Monica	4.4	4.1	4.2	4.1	4.2	4.2	4.0	4.3	4.3	4.1
Saticoy	4.3	4.2	4.4	4.2	4.3	4.2	4.2	4.2	4.3	4.2
Valencia	4.3	3.9	4.4	4.1	4.1	4.0	4.1	4.1	4.2	4.1
Visalia	4.1	3.9	4.2	3.9	4.0	3.9	3.9	4.0	4.0	3.9
Whittier	4.4	4.2	4.3	4.0	4.2	4.2	4.2	4.2	4.3	4.1
Yukon	4.2	4.1	4.5	4.1	4.0	3.9	4.0	4.1	4.0	4.0
Other (please specify)	4.1	3.9	4.3	4.0	4.1	3.9	4.0	4.0	4.0	4.0
Overall average	**4.2**	**4.1**	**4.3**	**4.1**	**4.2**	**4.1**	**4.1**	**4.2**	**4.2**	**4.2**

Table 21: Average scores for unionized participants by work location[26]

Primary work location	Leadership	Problem identification and resolution	Personal accountability	Work processes	Continuous learning	Environment for raising concerns	Effective safety communication	Respectful work environment	Questioning attitude	Decision making
Aliso Canyon	3.9	3.5	3.9	3.6	3.8	3.5	3.6	3.6	3.7	3.7
Aliso Viejo	4.1	3.8	4.1	3.9	3.9	3.9	3.8	4.0	4.1	3.8
Anaheim	4.0	3.9	4.2	4.0	4.1	3.9	3.9	4.0	4.1	4.1
Azusa	4.1	3.9	4.2	4.0	4.1	3.9	3.7	4.0	4.0	3.9
Bakersfield	4.0	3.9	4.3	4.0	4.1	4.0	3.9	4.0	4.1	3.9
Belvedere	4.3	4.1	4.3	4.2	4.1	4.1	4.1	4.3	4.4	4.1
Canoga	4.4	4.1	4.3	4.1	4.1	4.2	3.8	4.3	4.3	4.1
Chatsworth	4.5	4.2	4.3	4.2	4.2	4.1	4.2	4.1	4.3	4.2
Chino	4.3	4.1	4.3	4.1	4.3	4.1	4.1	4.3	4.2	4.2
Compton	4.1	3.9	4.2	4.0	4.1	3.9	3.9	4.0	4.2	4.1
Crenshaw	3.9	3.9	4.2	4.0	4.1	3.8	3.8	4.1	4.0	4.0
Downey Base	4.1	3.9	4.3	3.9	4.1	3.8	3.8	4.1	4.1	4.1
Fontana	4.0	3.9	4.1	3.9	3.8	3.7	3.6	3.9	3.9	3.7
Garden Grove	4.3	4.1	4.2	4.1	4.3	4.0	4.0	4.2	4.2	4.1
Glendale	4.0	3.8	4.1	3.9	4.1	3.9	3.7	3.9	4.1	4.1
Hollywood	4.0	3.9	4.1	3.9	4.2	3.9	3.9	4.0	4.1	4.1
Huntington Park	4.4	4.2	4.3	4.0	4.3	4.1	4.0	4.3	4.3	4.2
Juanita	4.2	4.1	4.2	4.1	4.2	4.1	3.9	4.1	4.1	4.0
La Jolla St	4.4	3.9	4.4	4.1	4.3	4.1	4.1	4.2	4.2	4.2
Monterey Park	4.0	3.9	4.1	4.0	4.0	3.7	3.7	3.7	3.9	3.9
Oxnard	4.1	3.9	4.2	4.0	4.0	4.0	3.7	4.0	4.2	3.9
Palm Desert	3.9	3.7	4.0	3.9	4.0	3.8	3.6	4.0	3.9	3.9
Pasadena	4.2	3.9	4.2	4.0	4.2	4.0	4.0	4.2	4.2	4.0
Pico Rivera	3.8	3.6	3.9	3.7	4.0	3.5	3.7	3.6	3.7	3.8
Ramona	4.5	4.2	4.4	4.2	4.3	4.1	3.8	4.2	4.2	4.2

[26] Averages are only presented for groups with more than 30 responses.

Primary work location	Leadership	Problem identification and resolution	Personal accountability	Work processes	Continuous learning	Environment for raising concerns	Effective safety communication	Respectful work environment	Questioning attitude	Decision making
Redlands	4.2	4.1	4.3	4.2	4.3	4.0	4.0	4.1	4.1	4.2
Redondo Beach (182nd St. Base)	3.9	3.9	4.1	3.9	4.0	3.8	3.5	4.0	3.8	3.9
Riverside	4.3	4.1	4.3	4.2	4.2	4.1	4.1	4.2	4.3	4.2
San Bernardino	4.2	3.9	4.2	4.0	4.1	4.0	4.0	4.1	4.2	4.1
San Dimas	4.0	4.0	4.1	4.1	4.1	3.7	3.8	4.0	4.0	4.0
Santa Ana	4.2	3.9	4.3	4.1	4.1	4.0	3.7	4.1	4.2	4.2
Santa Maria	4.0	3.9	4.2	3.9	4.0	4.0	3.9	4.1	4.1	3.8
Santa Monica	4.3	4.1	4.2	4.0	4.2	4.1	3.9	4.3	4.3	4.0
Saticoy	4.3	4.2	4.4	4.2	4.2	4.2	4.1	4.2	4.3	4.2
Valencia	4.2	3.9	4.3	4.1	4.1	4.0	4.0	4.0	4.2	4.1
Visalia	4.0	3.8	4.1	3.9	3.9	3.8	3.8	3.9	3.9	3.8
Yukon	4.2	4.2	4.4	4.1	4.0	3.9	3.9	4.1	4.0	3.9
Other	3.9	3.7	4.1	3.7	3.8	3.6	3.7	3.7	3.7	3.8
Average	**4.1**	**3.9**	**4.2**	**4.0**	**4.1**	**3.9**	**3.8**	**4.0**	**4.1**	**4.0**

Appendix C: Sempra Safety Culture Perception Survey Results

Summary

This report presents the results of safety culture perception survey conducted as part of an independent safety culture assessment of Sempra. This perception survey is only one safety culture assessment methods and therefore the results cannot be considered alone and will be integrated into the overall assessment.

The survey was conducted online using a commercial online survey provider. Sempra employees were emailed an individual survey link. The high participation rate, with 79% of employees completing the survey. The survey assesses ten safety culture dimensions and two safety behavior scales. The survey also asked a series of demographic questions (e.g., level of seniority) to enable comparisons between groups.

Participants reported very positive perceptions of Sempra's safety culture, with the average of all ten dimensions between 4.4 and 4.6 on a five-point scale. Directors and officers reported significantly more positive safety culture perceptions than non-supervisory participants.

The following conclusions were made:

- The vast majority of participants have positive perceptions of Sempra's safety culture and report high levels of safety behavior and low levels of at-risk behavior.
- Participants were slightly less positive about
    - the extent to which leadership skills are being developed,
    - items referring to contractors, including being held to the same standard and being involved in decisions,
    - work planning and the extent to which time frames are realistic,
    - ability to challenge decisions and be critical,
    - being recognized for safety conscious behavior,
    - trust between management and staff and between workgroups,
    - the extent to which questioning decisions is encouraged,
    - staffing levels,
    - encouraging co-workers to monitor their safety behavior.
- Directors and officers had significantly (0.5 on a 5-point scale) more positive safety culture perceptions than non-supervisory participants.

Introduction

This report summarizes the results of the Sempra safety culture perception survey. This perception survey was conducted as part of an independent safety culture assessment, which was ordered by OII. It is important to note that the results presented in this report need to be considered within the context of the overall assessment.

Method

The online survey was conducted using a commercial survey provider. Sempra provided email addresses for their employees and individual survey links were sent directly from the 2EC team to 359 employees. Email reminders were sent to employees to encourage them to participate in the survey. In total 284 employees completed the survey, which is an excellent response rate of 79%.

Table 1 presents the percentage of the sample for each employment category. The sample is representative of the Sempra, as most of the participants were non-supervisory staff.

Table 1: Percentage of the sample from each employment category

Officer or director	16.9%
Manager or Supervisor	23.7%
Non-Supervisor	59.4%

Table 2: Percentage of the sample from each department

Audit	13.7%
Controller/Tax	20.0%
Corporate Affairs	7.8%
Corporate Development & Strategy	2.2%
Finance/Risk/Treasury	15.6%
Human Resources	11.5%
Investor Relations	1.5%
Legal Operations & Admin	9.6%
Litigation/Compliance	2.2%
Security and Technology	9.3%
Other	6.7%

The survey assessed the 10 NRC safety culture dimensions, (Leadership safety values and actions; Problem identification and resolution; Personal accountability; Work processes; Continuous learning; Environment for raising concerns; Effective safety communication; Respectful work environment; Questioning attitude; Decision making) and safety and risk-taking behavior scales. The psychometric properties of these scales have been evaluated and all the scales demonstrate good internal reliability. Participants indicated the extent to which they agreed with each of the statements, from strongly disagree to strongly agree.

In line with best practice for online surveys, three attention check items were included in the survey. These items were used to identify participants who were not paying attention to the survey. The three items used and the percentage who responded to each option are presented in table 3 below. Only participants who disagreed or respond don't know to the three items are included in the results presented.

Table 3: Attention check items

Attention check	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know
I am responding to this survey without reading the statements	83.2%	7.9%	1.8%	3.2%	2.5%	1.4%
I am responding randomly to this survey	83.7%	7.5%	2.5%	1.8%	2.9%	1.4%
I am not paying attention while responding to this survey	89.9%	6.5%	0.7%	0.7%	1.1%	1.1%

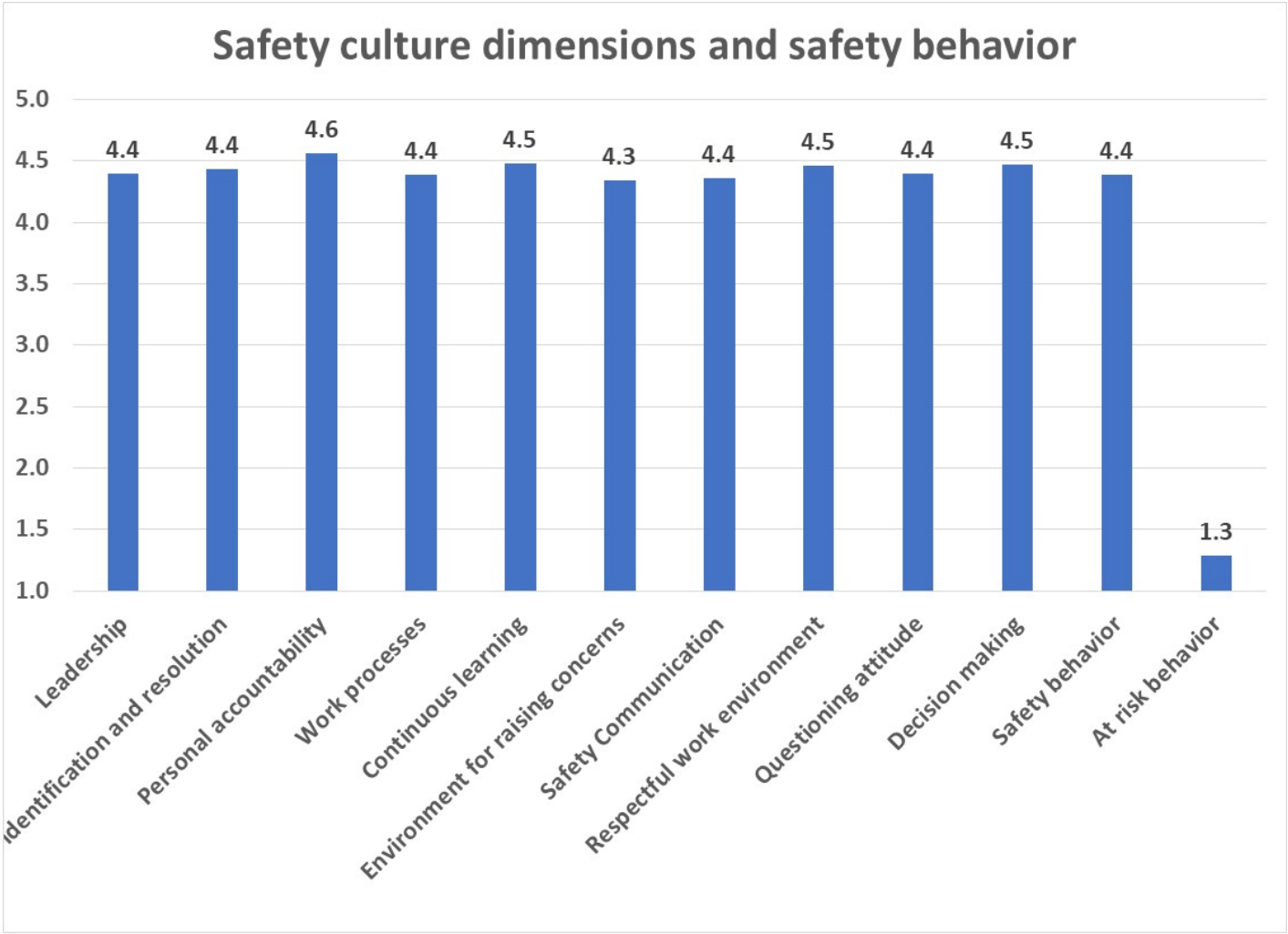
Results

The overall results of the safety culture perception survey will be presented initially, followed by an examination of the differences between groups, such as management and non-management staff.

Average score for safety culture dimensions

The average score for the 10 safety culture dimensions and the two safety behavior scales are presented in figure 1. The average scores for the safety culture dimensions are all within a narrow range between 4.3 and 4.6 on a five-point scale, where five represents strongly agree. Participants also reported high levels of safety behavior (4.4 on a five-point scale) and low levels of at risk behavior (1.3 on a five point scale). Therefore, the vast majority of participants reported positive perceptions of the safety culture at Sempra. Detailed descriptive statistics for each dimension are provided below.

Figure 1: Overall average for each safety culture dimension and safety behavior scales



Detailed analysis for each dimension

To provide a comprehensive description of participant responses the level of agreement with the items from each dimension is provided.

The leadership safety values and actions dimension contains 11 items that assess participants perception of leadership commitment to safety. Table 5 provides participants responses to each item from the leadership safety values and actions dimension.

Table 4: Level of agreement with leadership safety values and actions items

Leadership safety values and actions	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know[27]	Average
Sempra management makes safety the overriding priority	0.0%	0.4%	5.3%	37.6%	53.9%	2.9%	4.5
Sempra management ensures that leadership skills are systematically developed	0.4%	4.5%	13.1%	35.9%	38.0%	8.2%	4.2
Sempra management establishes clear safety expectations	0.4%	0.8%	6.5%	33.1%	57.6%	1.6%	4.5
Sempra management is visibly present in the workplace	0.0%	1.6%	10.2%	35.9%	46.1%	6.1%	4.4
My direct supervisor has good leadership skills	1.6%	3.3%	6.5%	28.2%	59.6%	0.8%	4.4
My direct supervisor helps our team to adapt to change	0.8%	3.3%	5.7%	33.9%	54.7%	1.6%	4.4
My direct supervisor helps resolve difficult issues between teams	0.8%	2.5%	6.9%	33.5%	50.2%	6.1%	4.4
My direct supervisor involves us when making decisions	0.8%	4.5%	8.6%	38.4%	45.7%	2.0%	4.3
My direct supervisor is responsive to safety concerns	1.2%	1.2%	6.1%	26.5%	59.6%	5.3%	4.5
Sempra management supports my direct supervisor in upholding safety standards	0.0%	0.8%	6.6%	27.9%	52.9%	11.9%	4.5
Sempra management is visibly present in the field	0.0%	2.0%	14.7%	17.1%	25.3%	40.8%	4.1

Participants report positive perceptions of leadership commitment to safety with average scores for each item above 4, Participants were generally more positive about items referring to their direct supervisor, with all items above 4.3. The lowest rated item (4.1) referred to Sempra management being present in the field.

The problem identification and resolution dimension contains five items, that asses perceptions of how Sempra identifies and resolves problems. Participants report positive perceptions of Sempra's processes for identifying and resolving problems, with all items average scores above 4.

[27] Don't know option was excluded when calculating averages.

Table 5: Problem identification and resolution items

Problem identification and resolution	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
Internal assessments helps us improve our safety performance	0.0%	0.4%	3.3%	38.4%	48.2%	9.8%	4.5
We at Sempra use operating experience to improve	0.0%	0.0%	4.1%	39.8%	45.9%	10.3%	4.5
Sempra incident investigations are effective	0.4%	0.4%	6.5%	23.3%	31.8%	37.6%	4.4
Sempra corrective actions are effective	0.4%	0.8%	8.2%	33.2%	35.7%	21.7%	4.3
Sempra performance indicators help us to improve	0.0%	1.2%	8.2%	46.1%	39.2%	5.3%	4.3

It is worth noting that a large percentage (37%) of participants selected Don't know[28] for the item referring to the effectiveness of incident investigations and 21% for corrective actions. They may be due to a lack of familiarity with the incident investigation process.

The personal accountability dimension contains eight items and assesses perceptions of the extent to which safety responsibilities are clearly defined, people understand their responsibility and meet those expectations. Participants report positive perceptions of personal accountability, with all items being above 4.4.

Table 6: Personal accountability items

Personal accountability	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
We at Sempra accept ownership for safety	0.0%	0.4%	2.9%	31.4%	61.2%	4.1%	4.6
Safety expectations are clearly defined	0.0%	2.0%	6.1%	34.7%	54.3%	2.9%	4.5
We at Sempra encourage each other to work safely	0.0%	0.0%	4.1%	31.4%	62.5%	2.0%	4.6
We at Sempra follow safety rules	0.0%	0.0%	2.5%	31.2%	63.9%	2.5%	4.6
We at Sempra understand our assigned tasks	0.0%	0.4%	3.7%	47.1%	48.0%	0.8%	4.4
Contractors are held to the same standard as other employees	0.0%	2.0%	6.1%	29.8%	38.4%	23.7%	4.4
We at Sempraadhere to procedures	0.0%	0.0%	2.9%	39.6%	56.7%	0.8%	4.5

[28] Don't know option was excluded when calculating averages.

Personal accountability	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
Safety responsibilities are clearly defined	0.0%	1.2%	7.4%	38.0%	48.2%	5.3%	4.4

Nearly a quarter of participants selected Don't know for the item referring to contractors. The high percentage of Don't know responses, likely reflects a lack of interaction with contractors.

The work processes dimension contains six items, assessing perceptions of planning, procedures and processes. Participants had positive perceptions of work process with all items receiving an average score above 4, with the two items referring to planning receiving the lowest scores.

Table 7: Work processes items

Work processes	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
We at Sempra have enough authority to perform our work safely	0.0%	0.0%	2.5%	39.6%	53.9%	4.1%	4.5
Sempra work processes are effective	0.0%	0.8%	8.6%	45.3%	42.0%	3.3%	4.3
Sempra has high quality procedures	0.0%	0.0%	5.7%	42.5%	47.8%	4.1%	4.4
Sempra has high quality documentation	0.0%	2.0%	9.0%	43.7%	38.8%	6.5%	4.3
Work is well planned	0.4%	4.5%	8.6%	47.8%	35.5%	3.3%	4.2
Work plans are realistic	0.4%	7.4%	13.9%	41.4%	33.6%	3.3%	4.0
Physical working conditions are good	0.0%	0.0%	1.2%	32.7%	59.2%	6.9%	4.6

The continuous learning dimension contains six items, assessing perceptions of Sempra's systems for learning and improving. Participants had positive perceptions of this dimension, with the average score for each above 4.3.

Table 8: Continuous learning items

Continuous learning	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
We at Sempra work to improve safety procedures	0.0%	0.0%	5.3%	30.2%	60.0%	4.5%	4.6
There are adequate resources to maintain competence	0.0%	1.6%	6.1%	35.9%	47.4%	9.0%	4.4

Continuous learning	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
We at Sempra value independent views of our safety performance	0.0%	0.8%	6.5%	32.2%	51.4%	9.0%	4.5
We at Sempra have regular opportunities to develop our skills	0.0%	3.7%	6.9%	40.0%	47.8%	1.6%	4.3
Safety assessments help Sempra improve	0.0%	0.0%	3.3%	31.0%	58.8%	6.9%	4.6
Sempra's training programs helps us improve	0.0%	0.4%	8.6%	37.3%	50.0%	3.7%	4.4

Environment for raising concerns dimension contains seven items, assessing perceptions of the reaction to raising a concern. Participants had positive perception of the reaction to raising concerns with five of the seven items having an average score of above 4.0.

Table 9: Environment for raising concerns items

Environment for raising concerns	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
I am responsible for identifying problems	0.0%	1.6%	4.5%	40.8%	51.4%	1.6%	4.4
I can openly challenge decisions made by management	1.2%	9.8%	18.8%	36.3%	29.8%	4.1%	3.9
I feel free to approach management with any concerns I have	0.4%	2.9%	10.2%	40.0%	45.7%	0.8%	4.3
Sempra management wants concerns reported and willingly listens to problems	0.0%	1.2%	9.0%	34.3%	51.4%	4.1%	4.4
Sempra management ensures any concerns raised are addressed	0.0%	1.2%	8.6%	36.1%	44.3%	9.8%	4.4
Helpful criticism is encouraged	0.0%	4.5%	10.6%	42.0%	40.0%	2.9%	4.2
Sempra management does not tolerate retaliation of any kind for raising concerns	0.4%	1.2%	4.5%	30.2%	56.7%	6.9%	4.5

Participants were less positive about the extent to which criticism was encouraged, with an average score of 4.2. The ability to openly challenge decisions made by management received the least positive response of all the safety culture items with an average score of 3.9.

The effective safety communication dimension contains six items, assessing perceptions of the effectiveness of Sempra's safety communication systems. Participants have positive perceptions of safety communication with four of the six items rated above 4.2.

Table 10: Effective safety communication items

Effective safety communication	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
The overriding priority of safety is clearly communicated	0.0%	0.4%	4.1%	28.6%	64.5%	2.5%	4.6
Information is effectively communicated across teams	0.0%	5.3%	10.2%	42.0%	38.8%	3.7%	4.2
My direct supervisor communicates effectively about safety	0.4%	4.1%	9.4%	27.8%	55.5%	2.9%	4.4
Sempra management communicates effectively about safety	0.0%	0.8%	4.1%	36.7%	57.1%	1.2%	4.5
Employees are recognized for safety conscious behaviors	0.8%	3.3%	9.0%	32.2%	41.6%	13.1%	4.3
Contractors are involved in safety discussions	0.0%	0.4%	11.8%	17.6%	23.7%	46.5%	4.2

Just over one in ten participants selected don't know for the item referring to employees being recognized for safety conscious behaviors. Nearly a half of participants reported that they did not know that contractors were involved in safety discussions.

The respectful work environment dimension contains eight items, assessing perceived levels of respect, collaboration, and trust. Participants have positive perceptions of the level of respect and trust within Sempra, with all items receiving a score above 4.2.

Table 11: Respectful work environment items

Respectful work environment	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
There is a high level of trust between workgroups	0.0%	2.9%	12.4%	43.2%	37.0%	4.5%	4.2

Respectful work environment	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
Employees are treated with respect	0.0%	0.8%	3.3%	32.2%	63.3%	0.4%	4.6
Employees take pride in their work	0.0%	0.4%	3.7%	34.7%	60.0%	1.2%	4.6
Employees support each other	0.0%	0.8%	4.1%	40.2%	54.5%	0.4%	4.5
Employees work together effectively to solve common problems	0.0%	0.8%	2.9%	45.9%	49.6%	0.8%	4.5
There is a high level of trust between management and employees	0.0%	2.9%	13.1%	44.5%	35.9%	3.7%	4.2
There is a high level of trust between my supervisor and my workgroup	0.4%	2.9%	3.7%	31.8%	60.0%	1.2%	4.5
There is a high level of trust within my workgroup	0.8%	1.2%	4.9%	35.5%	56.7%	0.8%	4.5

The questioning attitude dimension contains six items, assessing perceptions of the extent to which questioning decisions or adopting a cautious approach is encouraged. Participants have positive perceptions of the extent to which they are encouraged to adopt a cautious and questioning approach, with all items receiving a score above 4.1. Participants were less positive about questioning decisions (4.1).

Table 12: Questioning attitude items

Questioning attitude	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
I feel free to report mistakes	0.0%	1.6%	5.7%	39.6%	51.4%	1.6%	4.4
I feel free to ask questions about any issue	0.0%	2.9%	6.2%	39.8%	50.8%	0.4%	4.4
We at Sempra are encouraged to report problems that impact performance	0.0%	1.2%	6.2%	36.2%	55.1%	1.2%	4.5
We at Sempra openly share lessons learned when permissible	0.8%	2.0%	11.4%	38.0%	44.5%	3.3%	4.3
I feel free to question decisions	1.2%	6.5%	12.7%	41.6%	37.1%	0.8%	4.1
I feel free to stop the job when uncertain	0.4%	0.4%	8.7%	30.2%	44.2%	16.1%	4.4

The decision-making dimension contains six items, assessing perceptions of the extent to which Sempra's decision support systems reflect safety as the overriding priority. Participants had positive perceptions of decision-making, with all items receiving a score above 4.2.

Table 13: Decision making items

Decision making	Strongly Disagree	Disagree	Neither agree or disagree	Agree	Strongly agree	NA/ Don't know	Average
Sempra's strategic plans reflect safety as the overriding priority	0.0%	0.4%	6.6%	28.7%	61.1%	3.3%	4.6
Sempra's staffing levels reflect safety as the overriding priority	0.0%	4.1%	13.9%	27.4%	36.3%	18.4%	4.2
Sempra's documentation reflects safety as the overriding priority	0.0%	0.8%	5.3%	29.8%	54.3%	9.8%	4.5
Sempra's decisions reflect safety as the overriding priority	0.0%	0.8%	4.5%	33.2%	58.2%	3.3%	4.5
Sempra's response to safety concerns shows that safety is the overriding priority	0.0%	0.4%	2.9%	28.6%	66.1%	2.0%	4.6
The way resources are allocated shows that safety is the overriding priority	0.0%	1.6%	9.8%	33.2%	42.2%	13.1%	4.3

The safety culture perception survey also contained self-report safety behavior scales, one assessing safety behavior and a second assessing risk taking behavior. Participants responded by indicating how frequently they performed the specific behavior on a five-point scale from never to very often.

The safety behavior scale contains nine items, assessing the frequency at which participants perform safety behaviors. Participants report frequently performing safe behaviors, with all the behaviors except one receiving a score of 4.0 or above. The behavior with the lowest score (3.5) was encouraging co-workers to monitor their safety behavior.

Table 14: Safety behavior items

Safety behavior	Never	Rarely	Sometimes	Often	Very often	NA	Average
Talk positively about safety	0.4%	3.7%	17.6%	27.9%	42.2%	8.2%	4.2
Actively engaging in safety activities	0.8%	9.0%	18.8%	24.5%	30.2%	16.7%	3.9
Report hazards I observe	0.8%	3.7%	8.6%	21.0%	36.2%	29.6%	4.3
Follow safety rules and procedures	0.0%	0.0%	0.0%	16.5%	79.4%	4.1%	4.8

Safety behavior	Never	Rarely	Sometimes	Often	Very often	NA	Average
Encourage co-workers to monitor my safety behavior	7.4%	8.2%	15.2%	16.5%	20.6%	32.1%	3.5
Intervene every time I think someone is in an unsafe situation	1.7%	3.3%	5.8%	15.2%	42.8%	31.3%	4.4
Make sure the people I work with know my safety expectations	4.5%	4.5%	9.0%	20.8%	37.1%	24.1%	4.1
Encourage safe working by setting a good example	0.8%	3.3%	12.7%	24.5%	42.9%	15.9%	4.3
Communicate clearly about safety	0.0%	0.0%	3.3%	26.1%	61.6%	9.0%	4.6

The risk-taking behavior scale contains three items, assessing the frequency that participants report performing at risk behaviors. Participants report very low levels of risk-taking behavior, which the vast majority selecting never for the three items.

Table 15: Risk taking behavior items

Risk taking behavior	Never	Rarely	Sometimes	Often	Very often	NA	Average
Take short cuts to get the job done	61.2%	26.9%	3.7%	0.8%	0.8%	6.5%	1.4
Bend the rules to get a job done	86.1%	7.0%	0.8%	0.8%	0.4%	4.9%	1.1
Be cynical about safety	75.7%	6.2%	4.1%	1.2%	2.1%	10.7%	1.3

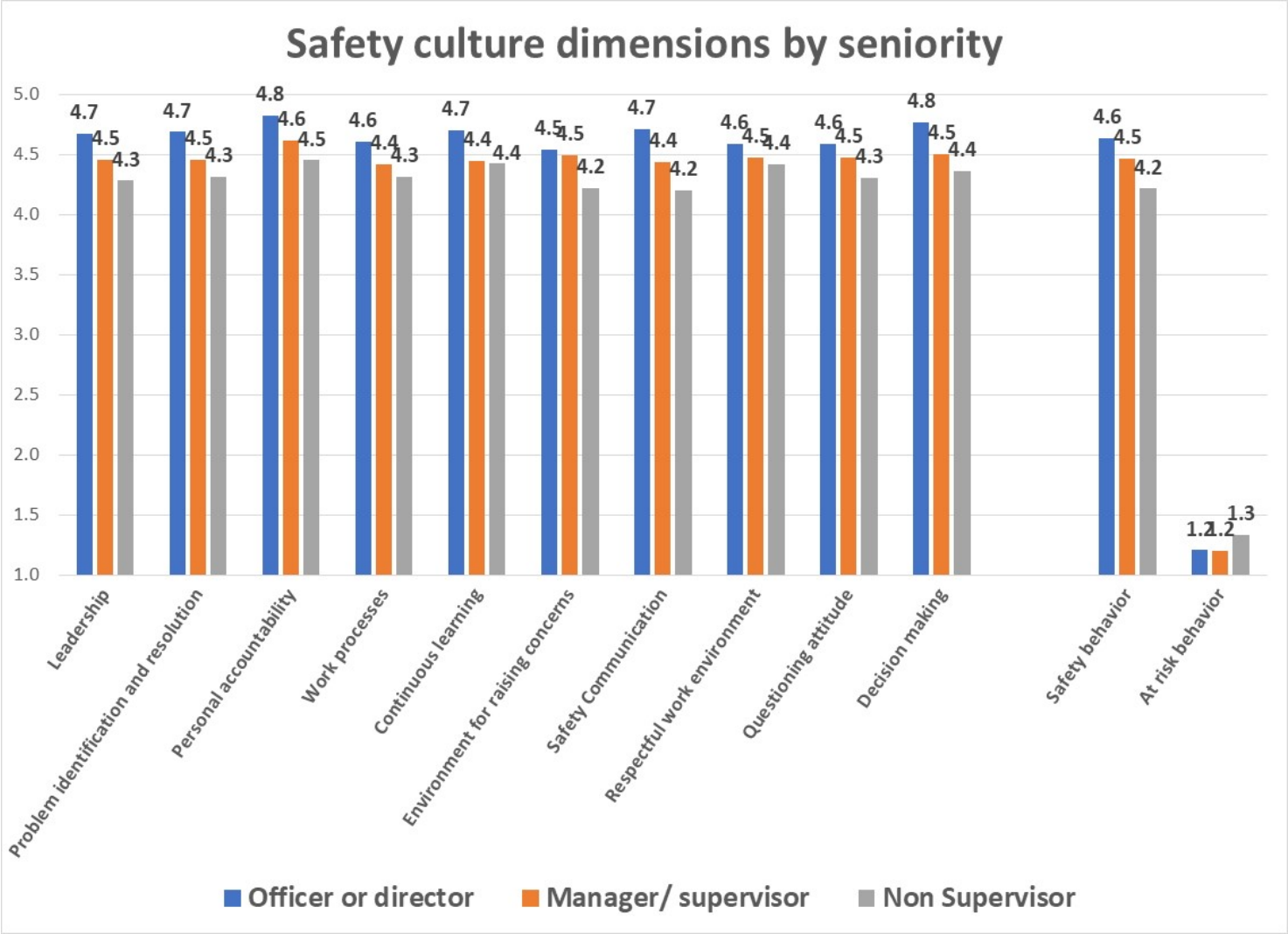
Differences between groups

Statistical analysis was performed on the data set to identify differences in the perceptions between groups of participants (e.g., managers versus non supervisors).

Figure 2 below presents the average score on the ten safety culture dimensions and the safety behavior scales for officers/ directors, managers/ supervisors and non-supervisors. Officers/ directors have the most positive perceptions of the safety culture, with their average score above 4.6 on all the dimensions. Directors' perceptions are significantly different from non-supervisors, except for respectful work environment where there is no difference. Manages / supervisors are similar to non supervisors, but slightly more positive (not statistically significant).

Officers/ directors and managers / supervisors report similar levels of safety behavior, which is significantly higher than non-supervisors. All groups report similarly low levels of risk taking behaviors.

Figure 2: Differences between officers /directors, managers/ supervisors, and non-supervisors



It was not possible to provide average scores for occupational groups as only two groups (Controller, tax, and Finance, risk, treasury) had over 30 participants respondents per group. The number of participants per group were reduced as many participates selected don't know for items, which were excluded from calculating the average score.

Conclusions

A very high proportion (79%) of Sempra employees completed the safety culture perception survey, which is an indication of their commitment to safety and the effort of Sempra management. This high response rate increases the validity of the survey results as there is less concern about response bias. The following general conclusions can be drawn from the results:

- The vast majority of participants have positive perceptions of Sempra's safety culture and report high levels of safety behavior and low levels of at-risk behavior.
- Participants were slightly less positive about
    - items referring to contractors, including being held to the same standard and being involved in decisions,
    - work planning and the extent to which time frames are realistic,
    - ability to challenge decisions and be critical,
    - being recognized for safety conscious behavior,
    - the extent to which questioning decisions is encouraged,
    - encouraging co-workers to monitor their safety behavior.
- Directors and officers had significantly more positive safety culture perceptions than non-supervisory participants.

Appendix D: List of Documents Requested for Review

SoCalGas' Safety Culture Order Instituting Investigation (OII) I.19-06-014

2EC Data Request Summary and Attachment Master List

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
1	2EC DR-01	N/A	Q01	N/A	14	Can we have access to the presentation materials from our Kick-Off meeting last week? If so, how?	SCOII_I1906014_2EC_DR_01-1333-1346 Document Exchange - Kick Off Final 081420.pdf
2	2EC DR-01	N/A	Q01	N/A	18	Can we have access to the presentation materials from our Kick-Off meeting last week? If so, how?	SCOII_I1906014_2EC_DR_01-1347-1364 Kick Off 2EC SCA and Brief Project Plan.pdf
3	2EC DR-01	N/A	Q01	N/A	1	Can we have access to the presentation materials from our Kick-Off meeting last week? If so, how?	SCOII_I1906014_2EC_DR_01-1365 Kickoff Meeting Agenda.pdf
4	2EC DR-01	N/A	Q01	N/A	31	Can we have access to the presentation materials from our Kick-Off meeting last week? If so, how?	SCOII_I1906014_2EC_DR_01-1366-1396 Safety Culture OII-Introduction to SoCalGas Final 073020.pdf
5	2EC DR-01	N/A	Q01	N/A	9	Can we have access to the presentation materials from our Kick-Off meeting last week? If so, how?	SCOII_I1906014_2EC_DR_01-1397-1405 Sempra Energy Corporate Structure Overview .pdf
6	2EC DR-01	N/A	Q02	N/A	2	SoCalGas mentioned that there are 50 bases, if we heard correctly. Can these be readily identified? I believe that I understand the regions and district offices but some clarification here would be extremely helpful. Clarification of 8/6: SoCal Gas to provide organizational	SCOII_I1906014_2EC_DR_01-0000004-0000005.pdf

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
						spreadsheet that provides information on number employees in each working group. Broken down to front line employees, supervisors, managers, district managers, directors, etc. (Information should give insight to number of employees reporting to each management level)	
7	2EC DR-01	N/A	Q02	N/A	1	SoCalGas mentioned that there are 50 bases, if we heard correctly. Can these be readily identified? I believe that I understand the regions and district offices but some clarification here would be extremely helpful. Clarification of 8/6: SoCal Gas to provide organizational spreadsheet that provides information on number employees in each working group. Broken down to front line employees, supervisors, managers, district managers, directors, etc. (Information should give insight to number of employees reporting to each management level)	SCOII_I1906014_2EC_DR_01-0000006.xlsx
8	2EC DR-01	N/A	Q02	N/A	1	SoCalGas mentioned that there are 50 bases, if we heard correctly. Can these be readily identified? I believe that I understand the regions and district offices but some clarification here would be extremely helpful. Clarification of 8/6:	SCOII_I1906014_2EC_DR_01-0000007.xlsx

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
						SoCal Gas to provide organizational spreadsheet that provides information on number employees in each working group. Broken down to front line employees, supervisors, managers, district managers, directors, etc. (Information should give insight to number of employees reporting to each management level)	
9	2EC DR-01	N/A	Q02	N/A	1	SoCalGas mentioned that there are 50 bases, if we heard correctly. Can these be readily identified? I believe that I understand the regions and district offices but some clarification here would be extremely helpful. Clarification of 8/6: SoCal Gas to provide organizational spreadsheet that provides information on number employees in each working group. Broken down to front line employees, supervisors, managers, district managers, directors, etc. (Information should give insight to number of employees reporting to each management level)	SCOII_I1906014_2EC_DR_01-0000008.xlsx
10	2EC DR-01	N/A	Q02	N/A	1,324	SoCalGas mentioned that there are 50 bases, if we heard correctly. Can these be readily identified? I believe that I understand the regions and district offices but some clarification here would	SCOII_I1906014_2EC_DR_01-0000009-0001332.pdf

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
						be extremely helpful. Clarification of 8/6: SoCal Gas to provide organizational spreadsheet that provides information on number employees in each working group. Broken down to front line employees, supervisors, managers, district managers, directors, etc. (Information should give insight to number of employees reporting to each management level)	
11	2EC DR-02	N/A	Q01	N/A	6	SoCal Gas to provide contractor demographics (information related to # of long / short term contractor, which service each contractor provides, etc.) to 2EC. 2EC to use initial information to assist in development of detailed assessment plan.	SCOII_I1906014_2EC_DR_02-0004-0009.pdf
12	2EC DR-03	N/A	Q01	N/A	1	Verbal Follow-Up Request of 2EC on August 20, 2020: Provide Top 5 Spend per Category with range of employees that work on SoCalGas projects for the contractor	SCOII_I1906014_2EC_DR_03-0002-Top 5 Categories.pdf
13	2EC DR-04	01	Q01.1	N/A	1	1. SoCalGas background information 1.1 Numbers of employees, organizational structure/ organizational charts	SCOII_I1906014_2EC_DR_04 Q01.1 SCOII_I1906014_2EC_DR_01-0000007
14	2EC DR-04	01	Q01.1	N/A	1	1. SoCalGas background information 1.1 Numbers of employees, organizational structure/ organizational charts	SCOII_I1906014_2EC_DR_04 Q01.1 SCOII_I1906014_2EC_DR_01-0000008

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
15	2EC DR-04	01	Q01.1	N/A	1,324	1. SoCalGas background information 1.1 Numbers of employees, organizational structure/ organizational charts	SCOII_I1906014_2EC_DR_04 Q01.1 SCOII_I1906014_2EC_DR_01-0000009-0001332
16	2EC DR-04	01	Q01.2	N/A	1	1. SoCalGas background information 1.2 Vision, Mission and Values	SCOII_I1906014_2EC_DR_04-0081 Q01.2 Attach 01 Safety Values_ver12020
17	2EC DR-04	06	Q01.3	N/A	1	1. SoCalGas background information 1.3 Latest Strategic Plan	SCOII_I1906014_2EC_DR_04-0082 Q01.3 Attach 01 Scott Drury Mission Video.mp4
18	2EC DR-04	06	Q01.3	N/A	1	1. SoCalGas background information 1.3 Latest Strategic Plan	SCOII_I1906014_2EC_DR_04-0083 Q01.3 Attach 02 SoCalGas Mission Final.mp4
19	2EC DR-04	06	Q01.3	N/A	105	1. SoCalGas background information 1.3 Latest Strategic Plan	SCOII_I1906014_2EC_DR_04-0084-0188 Q01.3 Attach 03 SoCalGas Mission - New Intranet Site.pdf
20	2EC DR-04	03	Q01.4	N/A	1	1. SoCalGas background information 1.4 Positions responsible for safety policy, development and compliance	SCOII_I1906014_2EC_DR_04-0089 Q01.4 Attach 01 CONFIDENTIAL SMS positions
21	2EC DR-04	01	Q02.1	N/A	1	2. Safety Records 2.1. Indicators of safety performance and trends	SCOII_I1906014_2EC_DR_04-0090 Q02.1 Attach 01 SPMR Attach B Metric Data 2010-2019
22	2EC DR-04	01	Q02.1	N/A	100	2. Safety Records 2.1. Indicators of safety performance and trends	SCOII_I1906014_2EC_DR_04-0091-0190 Q02.1 Attach 02 SoCalGas Safety Metrics Report
23	2EC DR-04	01	Q02.2	N/A	6	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0191-0196 Q02.2 Attach 1 SCG CPUC Gas Incidents Rpt 2017-2019 040920

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
24	2EC DR-04	01	Q02.2	N/A	7	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0197-0203 Q02.2 Attach 2 List of 3 years Event Reports for SoCalGas 040920
25	2EC DR-04	01	Q02.2	N/A	11	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0204-0214 Q02.2 Attach 3 (PHMSA) EOY 2017 SCG Transmission Report
26	2EC DR-04	01	Q02.2	N/A	11	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0215-0225 Q02.2 Attach 4 EOY 2018 SCG DOT-T
27	2EC DR-04	01	Q02.2	N/A	11	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0226-0236 Q02.2 Attach 5 EOY 2019 SoCalGas DOT-T
28	2EC DR-04	01	Q02.2	N/A	4	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0237-0240 Q02.2 Attach 6 EOY 2017 SCG Distribution Report
29	2EC DR-04	01	Q02.2	N/A	4	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0241-0244 Q02.2 Attach 7 EOY 2018 SCG DOT-D
30	2EC DR-04	01	Q02.2	N/A	4	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0245-0248 Q02.2 Attach 8 SoCalGas EOY 2019 DOT-D
31	2EC DR-04	01	Q02.2	N/A	8	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0249-0256 Q02.2 Attach 9 PHMSA Annual UNGS 2017 Final Rpt Sub (3-15-18)
32	2EC DR-04	01	Q02.2	N/A	8	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0257-0264 Q02.2 Attach 10 PHMSA Annual UNGS Supp 2018 Report 1225877

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
33	2EC DR-04	01	Q02.2	N/A	8	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0265-0272 Q02.2 Attach 11 PHMSA Annual UNGS 2019 Initial Report1225775
34	2EC DR-04	01	Q02.2	N/A	15	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0273-0287 Q02.2 Attach 12 PHMSA 2019 Report and Guidelines-03102020
35	2EC DR-04	01	Q02.2	N/A	1	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0288 Q02.2 Attach 13 Pressure Anomalies
36	2EC DR-04	01	Q02.2	N/A	10	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0289-0298 Q02.2 Attach 14 Survey Analysis Reports
37	2EC DR-04	01	Q02.2	N/A	62	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0299-0360 Q02.2 Attach 15 2017 OSHA 300A_Final
38	2EC DR-04	01	Q02.2	N/A	59	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0361-0418 Q02.2 Attach 16 2018 OSHA 300A_Final
39	2EC DR-04	01	Q02.2	N/A	59	2. Safety Records 2.2. List of the last three years event reports	SCOII_I1906014_2EC_DR_04-0419-0477 Q02.2 Attach 17 2019 OSHA 300A_Final
40	2EC DR-04	03	Q02.3	N/A	24	2. Safety Records 2.3. List of the last three years root cause investigation reports	SCOII_I1906014_2EC_DR_04-0478-0501 Q02.3 Attach 01 CONFIDENTIAL SIMS OSHA-LTI Report 2017-2020
41	2EC DR-04	03	Q02.3	N/A	15	2. Safety Records 2.3. List of the last three years root cause investigation reports	SCOII_I1906014_2EC_DR_04-0502-0516 Q02.3 Attach 02 CONFIDENTIAL CMVI Report 2017-2020

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42	2EC DR-04	03	Q02.3	N/A	1	2. Safety Records 2.3. List of the last three years root cause investigation reports	SCOII_I1906014_2EC_DR_04-0517 Q02.3 Attach 03 IEP 2017-2019 List
43	2EC DR-04	03	Q02.3	N/A	1	2. Safety Records 2.3. List of the last three years root cause investigation reports	SCOII_I1906014_2EC_DR_04-0518 Q02.3 Attach 04 Non-IEP Root Cause Investigations 2017-2019
44	2EC DR-04	04	Q02.4	N/A	3	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-0519-0521 Q02.4 Attach 01 CONFIDENTIAL YE ESCMP Checklist 2019
45	2EC DR-04	04	Q02.4	N/A	2	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-0522-0523 Q02.4 Attach 02 Facility ESCMP Assess 2017-2019 List Op Bases
46	2EC DR-04	04	Q02.4	N/A	6	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-0524-0529 Q02.4 Attach 03 CONFIDENTIAL Facility ESCMP Assess-2019 Anaheim
47	2EC DR-04	04	Q02.4	N/A	4	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/	SCOII_I1906014_2EC_DR_04-0530-0533 Q02.4 Attach 04 Facility Semi-A Assessments-2017-2019 Op Bases

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						organizational changes initiated based on these results)	
48	2EC DR-04	04	Q02.4	N/A	20	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-0534-0553 Q02.4 Attach 05 CONFIDENTIAL Facility Semi Assess-2019 Anaheim
49	2EC DR-04	04	Q02.4	N/A	4	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-0554-0557 Q02.4 Attach 06 CONFIDENTIAL 2019 Facility YE ESCMP Checklist Rsp
50	2EC DR-04	04	Q02.4	N/A	1	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-0558 Q02.4 Attach 07 CONFIDENTIAL Facility YE ESCMP Corrective Actions
51	2EC DR-04	04	Q02.4	N/A	3	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-0559-0561 Q02.4 Attach 08 CONFIDENTIAL Employee YE ESCMP Checklist 2019

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52	2EC DR-04	04	Q02.4	N/A	3	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-0562-0564 Q02.4 Attach 09 CONFIDENTIAL 2019 Employee YE ESCMP Check Rsp
53	2EC DR-04	04	Q02.4	N/A	1	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-0565 Q02.4 Attach 10 CONFIDENTIAL Employee Year-End ESCMP Correct Act
54	2EC DR-04	04	Q02.4	N/A	6	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-0566-0571 Q02.4 Attach 11 CONFIDENTIAL Std 167.33 Safety Insp Self-Assess
55	2EC DR-04	04	Q02.4	N/A	1	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-0572 Q02.4 Attach 12 CONFIDENTIAL SoCalGas ESCMP Policy
56	2EC DR-04	04	Q02.4	N/A	1,689	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/	SCOII_I1906014_2EC_DR_04-0573-2261 Q02.4 Attach 13 SCG-SDG E RAMP Report

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						organizational changes initiated based on these results)	
57	2EC DR-04	04	Q02.4	N/A	7	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-2262-2268 Q02.4 Attach 14 CONFIDENTIAL Safety Culture Assess Procedure
58	2EC DR-04	04	Q02.4	N/A	65	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-2269-2333 Q02.4 Attach 15 CONFIDENTIAL Safety Barometer Surv Rslt 2013
59	2EC DR-04	04	Q02.4	N/A	76	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-2334-2409 Q02.4 Attach 16 CONFIDENTIAL Safety Barometer Surv Rslt 2016
60	2EC DR-04	04	Q02.4	N/A	99	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-2410-2508 Q02.4 Attach 17 CONFIDENTIAL Safety Barometer Surv Rslt 2018

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61	2EC DR-04	04	Q02.4	N/A	2	2. Safety Records 2.4. Previous safety assessments reports (external and internal, including safety culture assessments and responses/ organizational changes initiated based on these results)	SCOII_I1906014_2EC_DR_04-2509-2510 Q02.4 Attach 18 CONFIDENTIAL 2019 AGA Continuous Imp Opps
62	2EC DR-04	02	Q02.5	N/A	8	2. Safety Records 2.5. Training for safety documents or content of training programs	SCOII_I1906014_2EC_DR_04-2511-2518 Q02.5 Attach 01 CONFIDENTIAL Std 166.004 Employee Safety Train
63	2EC DR-04	02	Q02.5	N/A	6	2. Safety Records 2.5. Training for safety documents or content of training programs	SCOII_I1906014_2EC_DR_04-2519-2524 Q02.5 Attach 02 CONFIDENTIAL Std 167.02 ESCMP
64	2EC DR-04	02	Q02.5	N/A	2	2. Safety Records 2.5. Training for safety documents or content of training programs	SCOII_I1906014_2EC_DR_04-2525-2526 Q02.5 Attach 03 CONFIDENTIAL Supv Guide Mand Safety Train Guide
65	2EC DR-04	02	Q02.5	N/A	2	2. Safety Records 2.5. Training for safety documents or content of training programs	SCOII_I1906014_2EC_DR_04-2527-2528 Q02.5 Attach 04 CONFIDENTIAL Office Mand Safety Train Guide
66	2EC DR-04	02	Q02.5	N/A	4	2. Safety Records 2.5. Training for safety documents or content of training programs	SCOII_I1906014_2EC_DR_04-2529-2532 Q02.5 Attach 05 CONFIDENTIAL ETR-A Course Curriculum (34-Day)
67	2EC DR-04	02	Q02.5	N/A	11	2. Safety Records 2.5. Training for safety documents or content of training programs	SCOII_I1906014_2EC_DR_04-2533-2543 Q02.5 Attach 06 CONFIDENTIAL 53101 Op Maint Small-Pneumatic Tools
68	2EC DR-04	02	Q02.5	N/A	4	2. Safety Records 2.5. Training for safety documents or content of training programs	SCOII_I1906014_2EC_DR_04-2544-2547 Q02.5 Attach 07 CONFIDENTIAL 53103 Safety In Motion

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69	2EC DR-04	02	Q02.5	N/A	10	2. Safety Records 2.5. Training for safety documents or content of training programs	SCOII_I1906014_2EC_DR_04-2548-2557 Q02.5 Attach 08 CONFIDENTIAL 53119 Personal Equip-LockOut
70	2EC DR-04	02	Q02.5	N/A	8	2. Safety Records 2.5. Training for safety documents or content of training programs	SCOII_I1906014_2EC_DR_04-2558-2565 Q02.5 Attach 09 CONFIDENTIAL 53121 Fire Fighting
71	2EC DR-04	02	Q02.5	N/A	6	2. Safety Records 2.5. Training for safety documents or content of training programs	SCOII_I1906014_2EC_DR_04-2566-2571 Q02.5 Attach 10 CONFIDENTIAL 53135 Heat Illness Prevention
72	2EC DR-04	02	Q02.5	N/A	23	2. Safety Records 2.5. Training for safety documents or content of training programs	SCOII_I1906014_2EC_DR_04-2572-2594 Q02.5 Attach 11 CONFIDENTIAL 71629 Respirator Fit Test
73	2EC DR-04	02	Q02.5	N/A	37	2. Safety Records 2.5. Training for safety documents or content of training programs	SCOII_I1906014_2EC_DR_04-2595-2631 Q02.5 Attach 12 CONFIDENTIAL 71662 Air Purifying Resp (APR)
74	2EC DR-04	02	Q02.5	N/A	54	2. Safety Records 2.5. Training for safety documents or content of training programs	SCOII_I1906014_2EC_DR_04-2632-2685 Q02.5 Attach 13 CONFIDENTIAL 71663 Airline Air Filtration Panel
75	2EC DR-04	02	Q02.8	N/A	2	2. Safety Records 2.8. Safety guidance from Sempra	SCOII_I1906014_2EC_DR_04-2686-2687 Q02.8 Attach 01 CONFIDENTIAL Sempra Safety Policy
76	2EC DR-04	02	Q02.8	N/A	3	2. Safety Records 2.8. Safety guidance from Sempra	SCOII_I1906014_2EC_DR_04-2688-2690 Q02.8 Attach 02 CONFIDENTIAL Sempra Safe Driving Policy
77	2EC DR-04	02	Q02.8	N/A	8	2. Safety Records 2.8. Safety guidance from Sempra	SCOII_I1906014_2EC_DR_04-2691-2698 Q02.8 Attach 03 CONFIDENTIAL Sempra Business Continuity Policy

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78	2EC DR-04	02	Q02.8	N/A	1	2. Safety Records 2.8. Safety guidance from Sempra	SCOII_I1906014_2EC_DR_04-2699 Q02.8 Attach 04 SoCalGas 2019 ENV ESCMP Certification Letter 4-10-20
79	2EC DR-04	02	Q02.8	N/A	1	2. Safety Records 2.8. Safety guidance from Sempra	SCOII_I1906014_2EC_DR_04-2700 Q02.8 Attach 05 SoCalGas 2019 ENVSFTY ESCMP Certif Letter 5-18-20
80	2EC DR-04	02	Q02.8	N/A	1	2. Safety Records 2.8. Safety guidance from Sempra	SCOII_I1906014_2EC_DR_04-2701 Q02.8 Attach 06 SoCalGas 2019 SFTY ESCMP Certification Letter 5-6-20
81	2EC DR-04	02	Q02.10	N/A	1	2. Safety Records 2.10. List of safety-related lawsuits and their status	SCOII_I1906014_2EC_DR_04-2702 Q02.10 Attach 01 Lawsuit Summary 2017-2020
82	2EC DR-04	03	Q02.11	N/A	4	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2703-2706 Q02.11 Attach 01 2020 Bill Insert_N20G0031A Priv Notice
83	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2707-2708 Q02.11 Attach 02 2020 Bill Insert_N20G0049A_Prop 65
84	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2709-2710 Q02.11 Attach 03 2020 Bill Insert_N20G0155A FYI
85	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2711-2712 Q02.11 Attach 04 2020 Bill Onsert_N20G0043A_Safety April
86	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2713-2714 Q02.11 Attach 05 2020 Bill Onsert_N20G0122A_Safety Aug

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87	2EC DR-04	03	Q02.11	N/A	4	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2715-2718 Q02.11 Attach 06 2020 DM_N20G0032A_Safety Aff Area Mail
88	2EC DR-04	03	Q02.11	N/A	4	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2719-2722 Q02.11 Attach 07 2020 DM_N20G0087A_Aff Area_Stor Comp Mail
89	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2723-2724 Q02.11 Attach 08 2020 DM_N20G0091A_Safety Exc Mail
90	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2725-2726 Q02.11 Attach 09 2020 DM_N20G0108A_Safety Ag Mail
91	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2727-2728 Q02.11 Attach 10 2020 DM_N20G0109A_Solar Elec Mail
92	2EC DR-04	03	Q02.11	N/A	5	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2729-2733 Q02.11 Attach 11 2020 Email Safety Excavators
93	2EC DR-04	03	Q02.11	N/A	5	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2734-2738 Q02.11 Attach 12 2020 Email Safety First Responders
94	2EC DR-04	03	Q02.11	N/A	6	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2739-2744 Q02.11 Attach 13 2020 Email Safety Public Officials
95	2EC DR-04	03	Q02.11	N/A	5	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2745-2749 Q02.11 Attach 14 2020 Email Safety School I

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96	2EC DR-04	03	Q02.11	N/A	3	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2750-2752 Q02.11 Attach 15 2020 Email Safety School II-Maintain Mtr
97	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2753-2754 Q02.11 Attach 16 2019 Bill Insert_N19G0116A
98	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2755-2756 Q02.11 Attach 17 2019 Bill Insert_Privacy Notice
99	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2757-2758 Q02.11 Attach 18 2019 Bill Insert_Prop 65
100	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2759-2760 Q02.11 Attach 19 2019 Bill Onsert_N19G0032B May
101	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2761-2762 Q02.11 Attach 20 2019 Bill Onsert_N19G0114A Oct
102	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2763-2764 Q02.11 Attach 21 2019 DM_N19E0175A Safety Solar Elec Mailer
103	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2765-2766 Q02.11 Attach 22 2019 DM_N19E0185A Safety Exc Mailer
104	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2767-2768 Q02.11 Attach 23 2019 DM_N19G0026A Safety Aff Area Mailer

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105	2EC DR-04	03	Q02.11	N/A	2	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2769-2770 Q02.11 Attach 24 2019 DM_N19G0137A Safety Ag Mailer
106	2EC DR-04	03	Q02.11	N/A	5	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2771-2775 Q02.11 Attach 25 2019 Email Safety Emergency Responders
107	2EC DR-04	03	Q02.11	N/A	6	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2776-2781 Q02.11 Attach 26 2019 Email Safety Excavators
108	2EC DR-04	03	Q02.11	N/A	6	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2782-2787 Q02.11 Attach 27 2019 Email Safety Public Officials
109	2EC DR-04	03	Q02.11	N/A	1	2. Safety Records 2.11. Processes of citizen input on safety concerns and environmental impact	SCOII_I1906014_2EC_DR_04-2788 Q02.11 Attach 28 CONFIDENTIAL CCC Flow Chart-Gas Leak
110	2EC DR-04	03	Q02.12	N/A	2	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2789-2790 Q02.12 Attach 01 CONFIDENTIAL Safe Congress Esp 10-12-20
111	2EC DR-04	03	Q02.12	N/A	4	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2791-2794 Q02.12 Attach 02 CONFIDENTIAL Safety update SH_Esp 10-9-20
112	2EC DR-04	03	Q02.12	N/A	3	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2795-2797 Q02.12 Attach 03 CONFIDENTIAL SMS Plan (Cho) 7-17-20
113	2EC DR-04	03	Q02.12	N/A	2	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2798-2799 Q02.12 Attach 04 CONFIDENTIAL Safety and Clean DW 7-20-20

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114	2EC DR-04	03	Q02.12	N/A	5	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2800-2804 Q02.12 Attach 05 CONFIDENTIAL Safety Holiday Wkd SH-GO 7-1-20
115	2EC DR-04	03	Q02.12	N/A	1	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2805 Q02.12 Attach 06 SMS Leadership Commitment Video (S Drury)
116	2EC DR-04	03	Q02.12	N/A	1	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2806 Q02.12 Attach 07 SMS Framework & Safety Values (J Cho)
117	2EC DR-04	03	Q02.12	N/A	1	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2807 Q02.12 Attach 08 Safe Driving Procedures (D Rendler)
118	2EC DR-04	03	Q02.12	N/A	1	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2808 Q02.12 Attach 09 Covid 19 Procedures Taylor
119	2EC DR-04	03	Q02.12	N/A	4	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2809-2812 Q02.12 Attach 10 CONFIDENTIAL Connect News Surv Rslt 101520
120	2EC DR-04	03	Q02.12	N/A	3	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2813-2815 Q02.12 Attach 11 CONFIDENTIAL Connect News Work Guide 81120
121	2EC DR-04	03	Q02.12	N/A	4	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2816-2819 Q02.12 Attach 12 CONFIDENTIAL Connect News Protocols Up 42220
122	2EC DR-04	03	Q02.12	N/A	2	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2820-2821 Q02.12 Attach 13 CONFIDENTIAL All in for Safety 2020

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123	2EC DR-04	03	Q02.12	N/A	3	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2822-2824 Q02.12 Attach 14 CONFIDENTIAL Tech takes Leak Surv to Next Lev
124	2EC DR-04	03	Q02.12	N/A	5	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2825-2829 Q02.12 Attach 15 CONFIDENTIAL Burbank Safety Health Congress 2019
125	2EC DR-04	03	Q02.12	N/A	3	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2830-2832 Q02.12 Attach 16 CONFIDENTIAL National Safety Council Survey Notice
126	2EC DR-04	03	Q02.12	N/A	5	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2833-2837 Q02.12 Attach 17 CONFIDENTIAL National Safety Council 2019 Results
127	2EC DR-04	03	Q02.12	N/A	3	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2838-2840 Q02.12 Attach 18 CONFIDENTIAL Bulletin - Driving Policy
128	2EC DR-04	03	Q02.12	N/A	1	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2841 Q02.12 Attach 19 CONFIDENTIAL Bulletin - Fall Protection
129	2EC DR-04	03	Q02.12	N/A	1	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2842 Q02.12 Attach 20 CONFIDENTIAL Bulletin - Hard Hats
130	2EC DR-04	03	Q02.12	N/A	1	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2843 Q02.12 Attach 21 CONFIDENTIAL Bulletin - IIPP 8_3-31-20
131	2EC DR-04	03	Q02.12	N/A	3	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2844-2846 Q02.12 Attach 22 CONFIDENTIAL Bulletin CV19 Face Cov 4-4-20

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132	2EC DR-04	03	Q02.12	N/A	1	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2847 Q02.12 Attach 23 CONFIDENTIAL Bulletin CV19 Face Cov Cloth 4-13-20
133	2EC DR-04	03	Q02.12	N/A	2	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2848-2849 Q02.12 Attach 24 CONFIDENTIAL Bulletin CV19 Face Cov 5-19-20
134	2EC DR-04	03	Q02.12	N/A	1	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2850 Q02.12 Attach 25 CONFIDENTIAL Bulletin - CV19 Local Testing 4-30-20
135	2EC DR-04	03	Q02.12	N/A	3	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2851-2853 Q02.12 Attach 26 CONFIDENTIAL Bulletin CV19 Safe Guide 5-15-20
136	2EC DR-04	03	Q02.12	N/A	3	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2854-2856 Q02.12 Attach 27 CONFIDENTIAL Bulletin CV19 Const Sites 4-6-20
137	2EC DR-04	03	Q02.12	N/A	3	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2857-2859 Q02.12 Attach 28 CONFIDENTIAL Bulletin CV19 Const Sites 8-27-20
138	2EC DR-04	03	Q02.12	N/A	2	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2860-2861 Q02.12 Attach 29 CONFIDENTIAL Bulletin CV19 Screen Qs R 8-28-20
139	2EC DR-04	03	Q02.12	N/A	2	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2862-2863 Q02.12 Attach 30 CONFIDENTIAL Bulletin CV19 1 Vehicle 7-23-20
140	2EC DR-04	03	Q02.12	N/A	2	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2864-2865 Q02.12 Attach 31 CONFIDENTIAL Bulletin CV19 1 Vehicle 8-20-20

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141	2EC DR-04	03	Q02.12	N/A	2	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2866-2867 Q02.12 Attach 32 CONFIDENTIAL Bulletin CV19 1 Vehicle 9-2-20
142	2EC DR-04	03	Q02.12	N/A	1	2. Safety Records 2.12. Communications to personnel regarding safety and safety culture	SCOII_I1906014_2EC_DR_04-2868 Q02.12 Attach 33 CONFIDENTIAL Bulletin CV19 Wild Smoke 8-21-20
143	2EC DR-04	02	Q03.1	N/A	9	3. Policies and programs 3.1. Safety/Health, Safety, Sustainability and Environmental (HSSE) Policy	SCOII_I1906014_2EC_DR_04-2869-2907 Q03.1 Attach 01 SoCalGas 2020 Safety Management Plan-SMS
144	2EC DR-04	02	Q03.1	N/A	58	3. Policies and programs 3.1. Safety/Health, Safety, Sustainability and Environmental (HSSE) Policy	SCOII_I1906014_2EC_DR_04-2908-2965 Q03.1 Attach 02 SoCalGas 2020 Gas Safety Plan
145	2EC DR-04	02	Q03.1	N/A	239	3. Policies and programs 3.1. Safety/Health, Safety, Sustainability and Environmental (HSSE) Policy	SCOII_I1906014_2EC_DR_04-2966-3204 Q03.1 Attach 03 CONFIDENTIAL IIPP Manual
146	2EC DR-04	02	Q03.1	N/A	89	3. Policies and programs 3.1. Safety/Health, Safety, Sustainability and Environmental (HSSE) Policy	SCOII_I1906014_2EC_DR_04-3205-3293 Q03.1 Attach 04 CONFIDENTIAL SoCalGas Contractor Safety Manual
147	2EC DR-04	02	Q03.1	N/A	92	3. Policies and programs 3.1. Safety/Health, Safety, Sustainability and Environmental (HSSE) Policy	SCOII_I1906014_2EC_DR_04-3294-3385 Q03.1 Attach 05 Sempra 2019 Corporate Sustainability Report
148	2EC DR-04	02	Q03.1	N/A	2	3. Policies and programs 3.1. Safety/Health, Safety, Sustainability and Environmental (HSSE) Policy	SCOII_I1906014_2EC_DR_04-3386-3387 Q03.1 Attach 06 CONFIDENTIAL Sempra Water Policy
149	2EC DR-04	02	Q03.1	N/A	2	3. Policies and programs 3.1. Safety/Health, Safety, Sustainability and Environmental (HSSE) Policy	SCOII_I1906014_2EC_DR_04-3388-3389 Q03.1 Attach 07 CONFIDENTIAL Sempra Biodiversity Policy

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
150	2EC DR-04	02	Q03.1	N/A	3	3. Policies and programs 3.1. Safety/Health, Safety, Sustainability and Environmental (HSSE) Policy	SCOII_I1906014_2EC_DR_04-3390-3393 Q03.1 Attach 08 CONFIDENTIAL Sempra Environmental Policy
151	2EC DR-04	02	Q03.2	N/A	6	3. Policies and programs 3.2. Safety culture/Human Performance programs	SCOII_I1906014_2EC_DR_04-3394-3399 Q03.2 Attach 01 NEO Safety Slides
152	2EC DR-04	02	Q03.2	N/A	1	3. Policies and programs 3.2. Safety culture/Human Performance programs	SCOII_I1906014_2EC_DR_04-3400 Q03.2 Attach 02 Course details on Safety Essentials for Supv
153	2EC DR-04	02	Q03.3	N/A	3	3. Policies and programs 3.3. Overtime policy and statistics	SCOII_I1906014_2EC_DR_04-3401-3403 Q03.3 Attach 01 CONFIDENTIAL Overtime Policy–Exempt (salaried)
154	2EC DR-04	02	Q03.3	N/A	4	3. Policies and programs 3.3. Overtime policy and statistics	SCOII_I1906014_2EC_DR_04-3404-3407 Q03.3 Attach 02 CONFIDENTIAL OT Policy–NonExempt hourly
155	2EC DR-04	02	Q03.3	N/A	219	3. Policies and programs 3.3. Overtime policy and statistics	SCOII_I1906014_2EC_DR_04-3408-3626 Q03.3 Attach 03 SCG Collective Barg Agreement 3-1-12 Rep
156	2EC DR-04	02	Q03.3	N/A	1	3. Policies and programs 3.3. Overtime policy and statistics	SCOII_I1906014_2EC_DR_04-3627 Q03.3 Attach 04 CONFIDENTIAL OT Statistics split by Cost-Hours-FTE
157	2EC DR-04	02	Q03.4	N/A	3	3. Policies and programs 3.4. Employee concerns programs	SCOII_I1906014_2EC_DR_04-3628-3630 Q03.4 Attach 01 CONFIDENTIAL Ethics Compliance Rep Inv Policy
158	2EC DR-04	02	Q03.4	N/A	5	3. Policies and programs 3.4. Employee concerns programs	SCOII_I1906014_2EC_DR_04-3631-3635 Q03.4 Attach 02 FAQ Sempra Navex EC Helpline

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
159	2EC DR-04	03	Q03.5	N/A	4	3. Policies and programs 3.5. Reward and recognition programs	SCOII_I1906014_2EC_DR_04-3636-3639 Q03.5 Attach 01 CONFIDENTIAL Sempra Energy With Purpose.pdf
160	2EC DR-04	03	Q03.5	N/A	8	3. Policies and programs 3.5. Reward and recognition programs	SCOII_I1906014_2EC_DR_04-3640-3647 Q03.5 Attach 02 CONFIDENTIAL SoCalGas 2020 ICP Plan Summary
161	2EC DR-04	03	Q03.5	N/A	2	3. Policies and programs 3.5. Reward and recognition programs	SCOII_I1906014_2EC_DR_04-3648-3649 Q03.5 Attach 03 CONFIDENTIAL SoCalGas Safety Recognition Policy
162	2EC DR-04	03	Q03.5	N/A	5	3. Policies and programs 3.5. Reward and recognition programs	SCOII_I1906014_2EC_DR_04-3650-3654 Q03.5 Attach 04 CONFIDENTIAL Std 166.0002 Safe Well Recog
163	2EC DR-04	04	Q03.8	A	7	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3655-3661 Q03.8 Attach-A 01 CONFIDENTIAL Std 223.0052 Ops Qual Leak Surv
164	2EC DR-04	04	Q03.8	A	7	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3662-3668 Q03.8 Attach-A 02 CONFIDENTIAL Std 223.0054 Ops Qual Mgmt LM
165	2EC DR-04	04	Q03.8	A	60	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3669-3728 Q03.8 Attach-A 03 CONFIDENTIAL SP1101 PSEP Qual Plan_062416
166	2EC DR-04	04	Q03.8	A	4	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3729-3732 Q03.8 Attach-A 04 CONFIDENTIAL QM 3-year Trending data 10-28-2020

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167	2EC DR-04	04	Q03.8	B	10	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3733-3742 Q03.8 Attach-B 01 CONFIDENTIAL Lessons Learned Cost Save 17-20
168	2EC DR-04	04	Q03.8	B	17	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3743-3759 Q03.8 Attach-B 02 CONFIDENTIAL Stage Gate Master File 2017-2020
169	2EC DR-04	04	Q03.8	C	9	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3760-3768 Q03.8 Attach-C 01 CONFIDENTIAL Complex Facility Checklist Stage 4
170	2EC DR-04	04	Q03.8	C	9	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3769-3777 Q03.8 Attach-C 02 CONFIDENTIAL Pipeline Checklist Stage 4
171	2EC DR-04	04	Q03.8	C	9	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3778-3786 Q03.8 Attach-C 03 CONFIDENTIAL Small Facility Checklist Stage 4
172	2EC DR-04	04	Q03.8	D	1	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3787 Q03.8 Attach-D 01 CONFIDENTIAL Coating Inspector Knowledge Check
173	2EC DR-04	04	Q03.8	D	16	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3788-3803 Q03.8 Attach-D 02 CONFIDENTIAL Std 182.0052 Weld Insp Op Qual

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174	2EC DR-04	04	Q03.8	D	1	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3804 Q03.8 Attach-D 03 CONFIDENTIAL Welding Inspector Knowledge Checklist
175	2EC DR-04	04	Q03.8	E	20	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3805-3824 Q03.8 Attach-E 01 CONFIDENTIAL Form 2849 Const Inspection Rpt
176	2EC DR-04	04	Q03.8	E	10	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3825-3834 Q03.8 Attach-E 02 CONFIDENTIAL Form 6350 Contractor Performance
177	2EC DR-04	04	Q03.8	E	2	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3835-3836 Q03.8 Attach-E 03 CONFIDENTIAL Sept 2020 trending Quality Index
178	2EC DR-04	04	Q03.8	F	22	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3837-3858 Q03.8 Attach-F 01 CONFIDENTIAL Std 192.0026 RecMgmt HP Closeout
179	2EC DR-04	04	Q03.8	G	20	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3859-3878 Q03.8 Attach-G 01 CONFIDENTIAL TIMP 15 Quality Assurance Plan
180	2EC DR-04	04	Q03.8	G	8	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3879-3886 Q03.8 Attach-G 02 CONFIDENTIAL Std 167.0125 SelfAudit Guide PI

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181	2EC DR-04	04	Q03.8	G	8	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3887-3894 Q03.8 Attach-G 03 CONFIDENTIAL Std 167.0126 IMP Cont Audit PI
182	2EC DR-04	04	Q03.8	G	6	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3895-3900 Q03.8 Attach-G 04 CONFIDNETIAL 2017 TIMP Plan-Rev Report
183	2EC DR-04	04	Q03.8	G	6	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3901-3906 Q03.8 Attach-G 05 CONFIDENTIAL 2018 TIMP Plan-Rev Report
184	2EC DR-04	04	Q03.8	G	7	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3907-3913 Q03.8 Attach-G 06 CONFIDENTIAL 2019 TIMP PlanPlan-Rev Report
185	2EC DR-04	04	Q03.8	H	11	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3914-3924 Q03.8 Attach-H 01 CONFIDENTIAL Dist Integrity Mgmt Plan DIMP1
186	2EC DR-04	04	Q03.8	H	1	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3925 Q03.8 Attach-H 02 CONFIDENTIAL DIMP Threat Metric
187	2EC DR-04	04	Q03.8	I	4	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3926-3929 Q03.8 Attach-I 01 CONFIDENTIAL Std 203.015 Cath Prot Self-Audit

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188	2EC DR-04	04	Q03.8	I	1	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3930 Q03.8 Attach-I 02 CONFIDENTIAL Cathodic Protection Distribution Metrics
189	2EC DR-04	04	Q03.8	J	22	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3931-3952 Q03.8 Attach-J 01 CONFIDENTIAL Std192.0030 CompDwg HP Pipe
190	2EC DR-04	04	Q03.8	J	17	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3953-3969 Q03.8 Attach-J 02 CONFIDENTIAL MSP 40-00 PolyE Pipe-Tub
191	2EC DR-04	04	Q03.8	J	8	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3970-3977 Q03.8 Attach-J 03 CONFIDENTIAL MSP 40-00 QCII PolyE Pipe-Tub
192	2EC DR-04	04	Q03.8	J	17	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3978-3994 Q03.8 Attach-J 04 CONFIDENTIAL Std 223.0030 Failure Analys Process
193	2EC DR-04	04	Q03.8	K	3	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3995-3997 Q03.8 Attach-K 01 CONFIDENTIAL M&R Quality Assurance metrics
194	2EC DR-04	04	Q03.8	K	7	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-3998-4004 Q03.8 Attach-K 02 CONFIDENTIAL Std 203.0002 Meas QA Req-Dist

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195	2EC DR-04	04	Q03.8	K	12	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4005-4016 Q03.8 Attach-K 03 CONFIDENTIAL MSP QCII 32_70 Plates Orifice Meter
196	2EC DR-04	04	Q03.8	K	18	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4017-4034 Q03.8 Attach-K 04 CONFIDENTIAL MSP QCII 35_35 AMRD Direct Mount
197	2EC DR-04	04	Q03.8	K	10	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4035-4044 Q03.8 Attach-K 05 CONFIDENTIAL MSP QCII 35_36 AMRD Remt Mount
198	2EC DR-04	04	Q03.8	K	6	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4045-4050 Q03.8 Attach-K 06 CONFIDENTIAL MSP QCII 35_60 MSA Prefabricated
199	2EC DR-04	04	Q03.8	K	3	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4051-4053 Q03.8 Attach-K 07 CONFIDENTIAL MSP QCII 56_45 Filters Serv-Main
200	2EC DR-04	04	Q03.8	K	8	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4054-4061 Q03.8 Attach-K 08 CONFIDENTIAL MSP QCII 56_58 Manifolds Meter
201	2EC DR-04	04	Q03.8	K	4	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4062-4065 Q03.8 Attach-K 09 CONFIDENTIAL MSP QCII 65_71 Reg_Small Vol

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202	2EC DR-04	04	Q03.8	K	3	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4066-4068 Q03.8 Attach-K 10 CONFIDENTIAL MSP QCII 70_25 Reg_Pilot
203	2EC DR-04	04	Q03.8	K	9	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4069-4077 Q03.8 Attach-K 11 CONFIDENTIAL MSP QCII 70_26 Reg_Pilot Loaded
204	2EC DR-04	04	Q03.8	K	3	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4078-4080 Q03.8 Attach-K 12 CONFIDENTIAL MSP QCII 70_29 Reg_Flex Element
205	2EC DR-04	04	Q03.8	K	4	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4081-4084 Q03.8 Attach-K 13 CONFIDENTIAL MSP QCII 70_45 Reg_Serv Std Pres
206	2EC DR-04	04	Q03.8	K	4	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4085-4088 Q03.8 Attach-K 14 CONFIDENTIAL MSP QCII 70_47 Regulators_HP SL
207	2EC DR-04	04	Q03.8	K	5	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4089-4093 Q03.8 Attach-K 15 CONFIDENTIAL MSP QCII 76_83 Ultrasonic Meter
208	2EC DR-04	04	Q03.8	K	3	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4094-4096 Q03.8 Attach-K 16 CONFIDENTIAL MSP QCII 76_84 OM_Run and Fit

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209	2EC DR-04	04	Q03.8	K	5	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4097-4101 Q03.8 Attach-K 17 CONFIDENTIAL MSP QCII 78_01 Meters_Diaphragm
210	2EC DR-04	04	Q03.8	K	4	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4102-4105 Q03.8 Attach-K 18 CONFIDENTIAL MSP QCII 78_02 Meters_Rotary
211	2EC DR-04	04	Q03.8	K	3	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4106-4108 Q03.8 Attach-K 19 CONFIDENTIAL MSP QCII 78_03 Meters_Turbine
212	2EC DR-04	04	Q03.8	L	6	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4109-4114 Q03.8 Attach-L 01 CONFIDENTIAL EAC NDE Oversight KPI 09-2020
213	2EC DR-04	04	Q03.8	L	7	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4115-4121 Q03.8 Attach-L 02 CONFIDENTIAL EAC NDE Oversight Data 090120
214	2EC DR-04	04	Q03.8	L	9	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4122-4130 Q03.8 Attach-L 03 CONFIDENTIAL EAC Bellhole Insp KPI Data 091720
215	2EC DR-04	04	Q03.8	L	35	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4131-4165 Q03.8 Attach-L 04 CONFIDENTIAL Qual Prog Manual Owner-Air Tnks

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216	2EC DR-04	04	Q03.8	L	22	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4166-4187 Q03.8 Attach-L 05 CONFIDENTIAL Qual Prog Manual NDE of Weld
217	2EC DR-04	04	Q03.8	L	20	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4188-4207 Q03.8 Attach-L 06 CONFIDENTIAL Std 182.0049 Liq Penetrant API-1104
218	2EC DR-04	04	Q03.8	L	18	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4208-4225 Q03.8 Attach-L 07 CONFIDENTIAL Std 182.0051 Mag Particle API-1104
219	2EC DR-04	04	Q03.8	L	14	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4226-4239 Q03.8 Attach-L 08 CONFIDENTIAL Std 187.0175 Insp Test Welds Steel
220	2EC DR-04	04	Q03.8	L	38	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4240-4277 Q03.8 Attach-L 09 CONFIDENTIAL Std 187.0200 Radiog Exam API-1104
221	2EC DR-04	04	Q03.8	L	38	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4278-4315 Q03.8 Attach-L 10 CONFIDENTIAL Std 187.0201 Comp Radio API-1104
222	2EC DR-04	04	Q03.8	L	6	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4316-4321 Q03.8 Attach-L 11 CONFIDENTIAL Std 223.0177 Remain Wall Thick

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
223	2EC DR-04	04	Q03.8	M	16	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4322-4337 Q03.8 Attach-M 01 CONFIDENTIAL AMS and Guidelines PP02.021
224	2EC DR-04	04	Q03.8	M	9	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4338-4346 Q03.8 Attach-M 02 CONFIDENTIAL Mtl Traceability Policy PP02.018
225	2EC DR-04	04	Q03.8	M	12	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4347-4358 Q03.8 Attach-M 03 CONFIDENTIAL Std 107.0004 Mfr Appv Qual Audit
226	2EC DR-04	04	Q03.8	M	33	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4359-4391 Q03.8 Attach-M 04 CONFIDENTIAL Std 182.0056 Mtl Trace for HP
227	2EC DR-04	04	Q03.8	M	5	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4392-4396 Q03.8 Attach-M 05 CONFIDENTIAL Std 182.0057 QDR Process
228	2EC DR-04	04	Q03.8	N	5	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4397-4401 Q03.8 Attach-N 01 CONFIDENTIAL EAC M E QA Metrics_2020.09
229	2EC DR-04	04	Q03.8	N	37	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4402-4438 Q03.8 Attach-N 02 CONFIDENTIAL Mtl QA Manual Guidance PP02.019

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
230	2EC DR-04	04	Q03.8	N	18	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4439-4456 Q03.8 Attach-N 03 CONFIDENTIAL Mtl Spec 41-06.1 PSG B-X70
231	2EC DR-04	04	Q03.8	N	38	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4457-4494 Q03.8 Attach-N 04 CONFIDENTIAL Mtl Spec 41-06.1AM PSG B-X70
232	2EC DR-04	04	Q03.8	N	6	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4495-4500 Q03.8 Attach-N 05 CONFIDENTIAL Mtl Spec 41-06.1DEV PSG A25-X70
233	2EC DR-04	04	Q03.8	N	8	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4501-4508 Q03.8 Attach-N 06 CONFIDENTIAL Mtl Spec 41-06.1QCII PSG A25-X70
234	2EC DR-04	04	Q03.8	N	12	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4509-4520 Q03.8 Attach-N 07 CONFIDENTIAL Mtl Spec 52-96 F-B Weld Steel
235	2EC DR-04	04	Q03.8	N	129	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4521-4649 Q03.8 Attach-N 08 CONFIDENTIAL Mtl Spec 52-96AM F-B Weld Steel
236	2EC DR-04	04	Q03.8	N	2	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4650-4651 Q03.8 Attach-N 09 CONFIDENTIAL Mtl Spec 52-96DEV F-B Weld Steel

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
237	2EC DR-04	04	Q03.8	N	3	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4652-4654 Q03.8 Attach-N 10 CONFIDENTIAL Mtl Spec 52-96QCII F-B Weld Steel
238	2EC DR-04	04	Q03.8	O	9	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4655-4763 Q03.8 Attach-O 01 CONFIDENTIAL Std 167.0100 Oper Qual Program
239	2EC DR-04	04	Q03.8	O	27	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4764-4790 Q03.8 Attach-O 02 CONFIDENTIAL Std 191.0025 Insp Scoring Const Wk
240	2EC DR-04	04	Q03.8	P	4	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4791-4794 Q03.8 Attach-P 01 CONFIDENTIAL Std 203.007 Patrol Self-Audit
241	2EC DR-04	04	Q03.8	P	4	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4795-4798 Q03.8 Attach-P 02 CONFIDENTIAL Std 203.008 Bridge Self-Audit
242	2EC DR-04	04	Q03.8	P	4	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4799-4802 Q03.8 Attach-P 03 CONFIDENTIAL Std 203.016 Leak Survey Self-Audit
243	2EC DR-04	04	Q03.8	P	4	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4803-4806 Q03.8 Attach-P 04 CONFIDENTIAL Std 203.017 Valve Insp Self-Audit

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
244	2EC DR-04	04	Q03.8	P	1	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4807 Q03.8 Attach-P 05 CONFIDENTIAL Metrics - Northwest
245	2EC DR-04	04	Q03.8	P	1	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4808 Q03.8 Attach-P 06 CONFIDENTIAL Metrics - Southeast
246	2EC DR-04	04	Q03.8	Q	12	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4809-4820 Q03.8 Attach-Q 01 CONFIDENTIAL MSP 56-40 Stop Cocks
247	2EC DR-04	04	Q03.8	R	17	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4821-4837 Q03.8 Attach-R 01 CONFIDENTIAL SIMP.8
248	2EC DR-04	04	Q03.8	S	96	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4838-4933 Q03.8 Attach-S 01 CONFIDENTIAL QA Handbook
249	2EC DR-04	04	Q03.8	S	4	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4934-4937 Q03.8 Attach-S 02 CONFIDENTIAL QA (CSF) Index System Summary
250	2EC DR-04	04	Q03.8	S	2	3. Policies and programs 3.8. Quality Management/ Operational Excellence Plans and Metrics (last 3 years)	SCOII_I1906014_2EC_DR_04-4938-4939 Q03.8 Attach-S 03 CONFIDENTIAL QA (MSA) Index System Summary

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
251	2EC DR-04	03	Q03.9	N/A	3	3. Policies and programs 3.9. Policy describing safety metrics role in job performance evaluations, promotions, and compensation: job classifications affected	SCOII_I1906014_2EC_DR_04-4940-4942 Q03.9 Attach 01 CONFIDENTIAL NonMgmt Appraisal Form
252	2EC DR-04	03	Q03.9	N/A	4	3. Policies and programs 3.9. Policy describing safety metrics role in job performance evaluations, promotions, and compensation: job classifications affected	SCOII_I1906014_2EC_DR_04-4943-4946 Q03.9 Attach 02 CONFIDENTIAL Pol165.0020 NonMgmt Appraisals
253	2EC DR-04	03	Q03.9	N/A	3	3. Policies and programs 3.9. Policy describing safety metrics role in job performance evaluations, promotions, and compensation: job classifications affected	SCOII_I1906014_2EC_DR_04-4947-4949 Q03.9 Attach 03 CONFIDENTIAL Performance Dialogue Sample
254	2EC DR-04	03	Q03.9	N/A	62	3. Policies and programs 3.9. Policy describing safety metrics role in job performance evaluations, promotions, and compensation: job classifications affected	SCOII_I1906014_2EC_DR_04-4950-5011 Q03.9 Attach 04 SCG-30 Robinson Prepared Direct Testimony
255	2EC DR-04	05	Q04.1	N/A	85	4. Financial and budget 4.1. Budget of safety improvement activities/ programs relative to overall budget	SCOII_I1906014_2EC_DR_04-5012-5096 Q04.1 Attach 01 SCG Semiannual GRC Att C Report_Jan-Dec 2019

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
256	2EC DR-04	04	Q04.2	N/A	1	4. Financial and budget 4.2. Budget of safety incentives, bonuses, awards	SCOII_I1906014_2EC_DR_04-5097 Q04.2 Attach 01 CONFIDENTIAL Budget of safety incentives
257	2EC DR-04	03	Q05.1	N/A	17	5. Organizational evolvement 5.1. Internal event reports, causal analyses, action status and lessons learned	SCOII_I1906014_2EC_DR_04-5098-5114 Q05.1 Attach 01 CONFIDENTIAL IEP 19-017 Anaheim C-1 Failure
258	2EC DR-04	03	Q05.1	N/A	14	5. Organizational evolvement 5.1. Internal event reports, causal analyses, action status and lessons learned	SCOII_I1906014_2EC_DR_04-5115-5128 Q05.1 Attach 02 CONFIDENTIAL IEP 17-026-01 USMC Pen Gas Outage
259	2EC DR-04	03	Q05.1	N/A	11	5. Organizational evolvement 5.1. Internal event reports, causal analyses, action status and lessons learned	SCOII_I1906014_2EC_DR_04-5129-5139 Q05.1 Attach 03 CONFIDENTIAL IEP 20-023 V Undersized Actuators
260	2EC DR-04	03	Q05.1	N/A	16	5. Organizational evolvement 5.1. Internal event reports, causal analyses, action status and lessons learned	SCOII_I1906014_2EC_DR_04-5140-5155 Q05.1 Attach 04 CONFIDENTIAL IEP 18-004 Azusa Under Pressure
261	2EC DR-04	03	Q05.1	N/A	12	5. Organizational evolvement 5.1. Internal event reports, causal analyses, action status and lessons learned	SCOII_I1906014_2EC_DR_04-5156-5167 Q05.1 Attach 05 CONFIDENTIAL IEP 17-032 Crenshaw Over Press
262	2EC DR-04	03	Q05.1	N/A	19	5. Organizational evolvement 5.1. Internal event reports, causal analyses, action status and lessons learned	SCOII_I1906014_2EC_DR_04-5168-5186 Q05.1 Attach 06 CONFIDENTIAL IEP 17-028 MV RV Hit MSA
263	2EC DR-04	03	Q05.1	N/A	1	5. Organizational evolvement 5.1. Internal event reports, causal	SCOII_I1906014_2EC_DR_04-5187 Q05.1 Attach 07 CONFIDENTIAL SIMS 25632_Root Cause Tree_2017CMVI

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
						analyses, action status and lessons learned	
264	2EC DR-04	03	Q05.1	N/A	1	5. Organizational evolvement 5.1. Internal event reports, causal analyses, action status and lessons learned	SCOII_I1906014_2EC_DR_04-5188 Q05.1 Attach 08 CONFIDENTIAL SIMS 26952_Root Cause Tree_2017CMVI
265	2EC DR-04	03	Q05.1	N/A	1	5. Organizational evolvement 5.1. Internal event reports, causal analyses, action status and lessons learned	SCOII_I1906014_2EC_DR_04-5189 Q05.1 Attach 09 CONFIDENTIAL SIMS 29462_Root Cause Tree_2018CMVI
266	2EC DR-04	03	Q05.1	N/A	1	5. Organizational evolvement 5.1. Internal event reports, causal analyses, action status and lessons learned	SCOII_I1906014_2EC_DR_04-5190 Q05.1 Attach 10 CONFIDENTIAL SIMS 36698_Root Cause Tree_2019CMVI
267	2EC DR-04	03	Q05.1	N/A	1	5. Organizational evolvement 5.1. Internal event reports, causal analyses, action status and lessons learned	SCOII_I1906014_2EC_DR_04-5191 Q05.1 Attach 11 CONFIDENTIAL SIMS 28023_Root Cause Tree_2017CMVI
268	2EC DR-04	03	Q05.1	N/A	2	5. Organizational evolvement 5.1. Internal event reports, causal analyses, action status and lessons learned	SCOII_I1906014_2EC_DR_04-5192-5193 Q05.1 Attach 12 CONFIDENTIAL SIMS 27005_RCT_2017OSHA
269	2EC DR-04	03	Q05.1	N/A	1	5. Organizational evolvement 5.1. Internal event reports, causal analyses, action status and lessons learned	SCOII_I1906014_2EC_DR_04-5194 Q05.1 Attach 13 CONFIDENTIAL SIMS 31991_Root Cause Tree_2018OSHA
270	2EC DR-04	03	Q05.1	N/A	1	5. Organizational evolvement 5.1. Internal event reports, causal	SCOII_I1906014_2EC_DR_04-5195 Q05.1 Attach 14 CONFIDENTIAL SIMS 36450_Root Cause Tree_2019OSHA

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						analyses, action status and lessons learned	
271	2EC DR-04	02	Q05.3	N/A	7	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5196-5202 Q05.3 Attach 01 CONFIDENTIAL 2017 SCG AC Storage Audit Closure
272	2EC DR-04	02	Q05.3	N/A	5	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5203-5206 Q05.3 Attach 02 CONFIDENTIAL 2017 SCG Basin Audit Closure
273	2EC DR-04	02	Q05.3	N/A	10	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5207-5216 Q05.3 Attach 03 CONFIDENTIAL 2017 SCG Central Coast Audit Closure
274	2EC DR-04	02	Q05.3	N/A	3	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5217-5219 Q05.3 Attach 04 CONFIDENTIAL 2017 SCG Coastal Audit Closure
275	2EC DR-04	02	Q05.3	N/A	7	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5220-5226 Q05.3 Attach 05 CONFIDENTIAL 2017 SCG Harbor Corr Audit Closure
276	2EC DR-04	02	Q05.3	N/A	6	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5227-5232 Q05.3 Attach 06 CONFIDENTIAL 2017 SCG Inland East Audit Closure
277	2EC DR-04	02	Q05.3	N/A	7	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5233-5239 Q05.3 Attach 07 CONFIDENTIAL 2017 SCG Inland South Audit Closure
278	2EC DR-04	02	Q05.3	N/A	3	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5240-5242 Q05.3 Attach 08 CONFIDENTIAL 2017 SCG Mid City LA Audit Closure
279	2EC DR-04	02	Q05.3	N/A	5	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5243-5247 Q05.3 Attach 09 CONFIDENTIAL 2017 SCG Mount Pass Audit Closure

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
280	2EC DR-04	02	Q05.3	N/A	3	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5248-5250 Q05.3 Attach 10 CONFIDENTIAL 2017 SCG North Coast Audit Closure
281	2EC DR-04	02	Q05.3	N/A	2	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5251-5252 Q05.3 Attach 11 CONFIDENTIAL 2017 SCG North Desert Audit Closure
282	2EC DR-04	02	Q05.3	N/A	6	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5253-5258 Q05.3 Attach 12 CONFIDENTIAL 2017 SCG Orange Coast Audit Closure
283	2EC DR-04	02	Q05.3	N/A	6	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5259-5264 Q05.3 Attach 13 CONFIDENTIAL 2017 SCG Orange North Audit Closure
284	2EC DR-04	02	Q05.3	N/A	3	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5265-5267 Q05.3 Attach 14 CONFIDENTIAL 2017 SCG SG Valley Audit Closure
285	2EC DR-04	02	Q05.3	N/A	4	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5268-5271 Q05.3 Attach 15 CONFIDENTIAL 2017 SCG SG Valley Audit Closure
286	2EC DR-04	02	Q05.3	N/A	3	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5272-5274 Q05.3 Attach 16 CONFIDENTIAL 2017 SCG SJV Audit Closure
287	2EC DR-04	02	Q05.3	N/A	6	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5275-5280 Q05.3 Attach 17 CONFIDENTIAL 2017 SCG SJV Dist Audit Closure
288	2EC DR-04	02	Q05.3	N/A	3	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5281-5283 Q05.3 Attach 18 CONFIDENTIAL 2017 SCG South Coast Audit Closure

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
289	2EC DR-04	02	Q05.3	N/A	4	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5284-5287 Q05.3 Attach 19 CONFIDENTIAL 2017 SCG South Desert Audit Closure
290	2EC DR-04	02	Q05.3	N/A	5	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5288-5292 Q05.3 Attach 20 CONFIDENTIAL 2017 Sempra Comp St Audit Closure
291	2EC DR-04	02	Q05.3	N/A	3	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5293-5295 Q05.3 Attach 21 CONFIDENTIAL 2017 Sempra DIMP Audit Closure
292	2EC DR-04	02	Q05.3	N/A	4	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5296-5299 Q05.3 Attach 22 CONFIDENTIAL 2017 Sempra EMP PAP Audit Letter
293	2EC DR-04	02	Q05.3	N/A	4	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5300-5303 Q05.3 Attach 23 CONFIDENTIAL 2017 Sempra OME Audit Closure
294	2EC DR-04	02	Q05.3	N/A	4	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5304-5307 Q05.3 Attach 24 CONFIDENTIAL 2017 Sempra Producer Audit Closure
295	2EC DR-04	02	Q05.3	N/A	2	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5308-5309 Q05.3 Attach 25 CONFIDENTIAL 2017 Sempra PSEP Audit Closure
296	2EC DR-04	02	Q05.3	N/A	5	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5310-5314 Q05.3 Attach 26 CONFIDENTIAL 2018 SCG Desert Valley Audit Closure
297	2EC DR-04	02	Q05.3	N/A	4	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5315-5318 Q05.3 Attach 27 CONFIDENTIAL 2018 SCG Goleta Audit Closure

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298	2EC DR-04	02	Q05.3	N/A	11	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5319-5329 Q05.3 Attach 28 CONFIDENTIAL 2018 SCG San Joaquin Audit Closure
299	2EC DR-04	02	Q05.3	N/A	5	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5330-5334 Q05.3 Attach 29 CONFIDENTIAL 2018 SCG South Desert Audit Closure
300	2EC DR-04	02	Q05.3	N/A	5	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5335-5339 Q05.3 Attach 30 CONFIDENTIAL 2018 Sempra OME Audit Closure
301	2EC DR-04	02	Q05.3	N/A	2	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5340-5341 Q05.3 Attach 31 CONFIDENTIAL 2018 Sempra PA Prog Audit Closure
302	2EC DR-04	02	Q05.3	N/A	4	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5342-5345 Q05.3 Attach 32 CONFIDENTIAL 2018 Sempra TIMP Audit Closure
303	2EC DR-04	02	Q05.3	N/A	2	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5346-5347 Q05.3 Attach 33 CONFIDENTIAL 2019 SCG Basin Trans Audit Closure
304	2EC DR-04	02	Q05.3	N/A	1	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5348 Q05.3 Attach 34 CONFIDENTIAL 2019 SCG Drug & Alcohol Audit Closure
305	2EC DR-04	02	Q05.3	N/A	17	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5349-5365 Q05.3 Attach 35 CONFIDENTIAL 2019 SCG Harbor Cor Audit Closure
306	2EC DR-04	02	Q05.3	N/A	7	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5366-5373 Q05.3 Attach 36 CONFIDENTIAL 2019 SCG HR Storage Audit Closure

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307	2EC DR-04	02	Q05.3	N/A	15	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5374-5388 Q05.3 Attach 37 CONFIDENTIAL 2019 SCG Mid-City LA Audit Closure
308	2EC DR-04	02	Q05.3	N/A	6	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5389-5394 Q05.3 Attach 38 CONFIDENTIAL 2019 SCG Mountain Pass Audit Closure
309	2EC DR-04	02	Q05.3	N/A	8	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5395-5402 Q05.3 Attach 39 CONFIDENTIAL 2019 SCG NDesert Transm Audit Closure
310	2EC DR-04	02	Q05.3	N/A	6	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5403-5408 Q05.3 Attach 40 CONFIDENTIAL 2019 SCG Orange North Audit Closure
311	2EC DR-04	02	Q05.3	N/A	4	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5409-5412 Q05.3 Attach 41 CONFIDENTIAL 2019 Sempra Control RmAudit Closure
312	2EC DR-04	02	Q05.3	N/A	16	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5413-5428 Q05.3 Attach 42 CONFIDENTIAL 2019 Sempra Dmg Prev Audit Closure
313	2EC DR-04	02	Q05.3	N/A	11	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5429-5439 Q05.3 Attach 43 CONFIDENTIAL 2019 Sempra OME Audit Closure
314	2EC DR-04	02	Q05.3	N/A	6	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5440-5445 Q05.3 Attach 44 CONFIDENTIAL 2019 Sempra TIMP Audit Closure

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315	2EC DR-04	02	Q05.3	N/A	9	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5446-5454 Q05.3 Attach 45 CONFIDENTIAL 2020 SCG Central Coast Audit Closure
316	2EC DR-04	02	Q05.3	N/A	5	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5455-5459 Q05.3 Attach 46 CONFIDENTIAL 2020 SCG Coastal Audit Closure
317	2EC DR-04	02	Q05.3	N/A	10	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5460-5469 Q05.3 Attach 47 CONFIDENTIAL 2020 SCG OME Audit Closure
318	2EC DR-04	02	Q05.3	N/A	8	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5470-5477 Q05.3 Attach 48 CONFIDENTIAL 2020 SCG Op Qual Prog Audit Closure
319	2EC DR-04	02	Q05.3	N/A	4	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5478-5481 Q05.3 Attach 49 CONFIDENTIAL 2020 SCG Orange Coast Audit Closure
320	2EC DR-04	02	Q05.3	N/A	5	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5482-5486 Q05.3 Attach 50 CONFIDENTIAL 2020 SCG San Fernando Audit Closure
321	2EC DR-04	02	Q05.3	N/A	1	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5487 Q05.3 Attach 51 CONFIDENTIAL Veriforce Evaluator Audit Rpt
322	2EC DR-04	02	Q05.3	N/A	1	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5488 Q05.3 Attach 52 CONFIDENTIAL Veriforce Evaluator Audit Rpt
323	2EC DR-04	02	Q05.3	N/A	1	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5489 Q05.3 Attach 53 CONFIDENTIAL Veriforce Evaluator Audit Rpt

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324	2EC DR-04	02	Q05.3	N/A	1	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5490 Q05.3 Attach 54 CONFIDENTIAL Veriforce Evaluator Audit Rpt
325	2EC DR-04	02	Q05.3	N/A	1	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5491 Q05.3 Attach 55 CONFIDENTIAL Veriforce Evaluator Audit Rpt
326	2EC DR-04	02	Q05.3	N/A	1	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5492 Q05.3 Attach 56 CONFIDENTIAL Veriforce Evaluator Audit Rpt
327	2EC DR-04	02	Q05.3	N/A	1	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5493 Q05.3 Attach 57 CONFIDENTIAL Veriforce Evaluator Audit Rpt
328	2EC DR-04	02	Q05.3	N/A	1	5. Organizational evolvement 5.3. External safety audits	SCOII_I1906014_2EC_DR_04-5494 Q05.3 Attach 58 CONFIDENTIAL Veriforce Evaluator Audit Rpt
329	2EC DR-04	02	Q06.1	N/A	4	6. Process 6.1. Process documents related to review of safety incidents through the organization by type incident	SCOII_I1906014_2EC_DR_04-5495-5498 Q06.1 Attach 01 CONFIDENTIAL Std 191.01 Safety Invg Pipe Failures
330	2EC DR-04	02	Q06.1	N/A	16	6. Process 6.1. Process documents related to review of safety incidents through the organization by type incident	SCOII_I1906014_2EC_DR_04-5499-5514 Q06.1 Attach 02 CONFIDENTIAL Std 223.0032 Pipeline Safety Compl
331	2EC DR-04	02	Q06.2	N/A	7	6. Process 6.2. Process documents related to review of CPUC investigations of alleged violations	SCOII_I1906014_2EC_DR_04-5515-5521 Q06.2 Attach 01 CONFIDENTIAL Std 183.11 Mgmt Review Cont Impr

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
332	2EC DR-05	N/A	Q01.1.1	N/A	1	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.1. Employees	SCOII_I1906014_2EC_DR_05-0005 Q01.1.1 Attach 1 Connected Video-Work Remote Parenting.pdf
333	2EC DR-05	N/A	Q01.1.1	N/A	6	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.1. Employees	SCOII_I1906014_2EC_DR_05-0006-0011 Q01.1.1 Attach 2 CV19_HR_Remote Work Policy COVID 19 Revised_2020_07.pdf
334	2EC DR-05	N/A	Q01.1.1	N/A	4	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.1. Employees	SCOII_I1906014_2EC_DR_05-0012-0015 Q01.1.1 Attach 3 Bulletin-Work Remote Guide for Rep NonExempt Emp.pdf
335	2EC DR-05	N/A	Q01.1.1	N/A	1	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.1. Employees	SCOII_I1906014_2EC_DR_05-0016 Q01.1.1 Attach 4 School Closure Website.pdf
336	2EC DR-05	N/A	Q01.1.1	N/A	3	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during	SCOII_I1906014_2EC_DR_05-0017-0019 Q01.1.1 Attach 5 Supervisor Resource Guide FINAL.pdf

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						COVID-19 crisis to: 1.1.1. Employees	
337	2EC DR-05	N/A	Q01.1.2	N/A	20	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.2. Employees's families/Family Guide	SCOII_I1906014_2EC_DR_05-0020-0039 Q01.1.2 Attach 1 SCG Family Guidebook FINAL.pdf
338	2EC DR-05	N/A	Q01.1.3	N/A	5	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.3. Customers	SCOII_I1906014_2EC_DR_05-0040-0044 Q01.1.3 Attach 1 COVID-19 Our Support & Response SoCalGas-Web.pdf
339	2EC DR-05	N/A	Q01.1.3	N/A	2	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.3. Customers	SCOII_I1906014_2EC_DR_05-0045-0046 Q01.1.3 Attach 2 Stands with Our Community During Covid19 Newsletter.pdf
340	2EC DR-05	N/A	Q01.1.3	N/A	5	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to:1.1.3. Customers	SCOII_I1906014_2EC_DR_05-0047-0051 Q01.1.3 Attach 3 COVID19 Protocol and Entered Work Orders CSF200421.pdf
341	2EC DR-05	N/A	Q01.1.4	N/A	7	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during	SCOII_I1906014_2EC_DR_05-0052-0058 Q01.1.4 Attach 1 COVID-19_Leave Policy.pdf

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						presentation SoCal Gas provided during COVID-19 crisis to: 1.1.4. Leave policy	
342	2EC DR-05	N/A	Q01.1.4	N/A	7	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.4. Leave policy	SCOII_I1906014_2EC_DR_05-0059-0065 Q01.1.4 Attach 2 COVID-19_Leave Policy Addendum.pdf
343	2EC DR-05	N/A	Q01.1.5	N/A	16	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.5. Example pamphlet	SCOII_I1906014_2EC_DR_05-0066-0081 Q01.1.5 Attach 1 COVID-19 Safety Playbook.pdf
344	2EC DR-05	N/A	Q01.1.6	N/A	19	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.6. Overview of mandatory COVID-19 training	SCOII_I1906014_2EC_DR_05-0082-0100 Q01.1.6 Attach 1 remote-work-policy-covid-19.pdf
345	2EC DR-05	N/A	Q01.1.6	N/A	20	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.6. Overview of mandatory COVID-19 training	SCOII_I1906014_2EC_DR_05-0101-0120 Q01.1.6 Attach 2 remote-work-policy-covid-19-for-leaders.pdf

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346	2EC DR-05	N/A	Q01.1.6	N/A	57	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.6. Overview of mandatory COVID-19 training	SCOII_I1906014_2EC_DR_05-0121-0177 Q01.1.6 Attach 3 Working Effectively Through COVID-19.pdf
347	2EC DR-05	N/A	Q01.1.6	N/A	39	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.6. Overview of mandatory COVID-19 training	SCOII_I1906014_2EC_DR_05-0178-0216 Q01.1.6 Attach 4 Successfully Navigating Covid-19 Workplace Changes.pdf
348	2EC DR-05	N/A	Q01.1.7	N/A	18	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.7. Presentation displayed in the 9/24/20 meeting	SCOII_I1906014_2EC_DR_05-0217-0234 Q01.1.7 Attach 1 09242020 CV19 CPUC OII1906014 Presentation.pdf
349	2EC DR-05	N/A	Q01.1.8	N/A	14	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.8. Other Materials	SCOII_I1906014_2EC_DR_05-0235-0248 Q01.1.8 Attach 1 Connected Voices_Childcare School Closure Surv Results.pdf

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350	2EC DR-05	N/A	Q01.1.8	N/A	21	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.8. Other Materials	SCOII_I1906014_2EC_DR_05-0249-0269 Q01.1.8 Attach 2 Quarantine & Notification Protocols UPDATED.pdf
351	2EC DR-05	N/A	Q01.1.8	N/A	221	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.8. Other Materials	SCOII_I1906014_2EC_DR_05-0270-0490 Q01.1.8 Attach 3 2012 Agreement.pdf
352	2EC DR-05	N/A	Q01.1.8	N/A	2	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.8. Other Materials	SCOII_I1906014_2EC_DR_05-0491-0492 Q01.1.8 Attach 4 Leadership Video_R.Schwecke_announcement.pdf
353	2EC DR-05	N/A	Q01.1.8	N/A	1	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.8. Other Materials	SCOII_I1906014_2EC_DR_05-0493 Q01.1.8 Attach 5 Leadership Video_R.Schwecke_video.mp4
354	2EC DR-05	N/A	Q01.1.8	N/A	3	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during	SCOII_I1906014_2EC_DR_05-0494-0496 Q01.1.8 Attach 6 Safety Practices for Construction Sites.pdf

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						COVID-19 crisis to: 1.1.8. Other Materials	
355	2EC DR-05	N/A	Q01.1.8	N/A	3	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.8. Other Materials	SCOII_I1906014_2EC_DR_05-0497-0499 Q01.1.8 Attach 7 Labor Day Safety Reminder.pdf
356	2EC DR-05	N/A	Q01.1.8	N/A	2	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.8. Other Materials	SCOII_I1906014_2EC_DR_05-0500-0501 Q01.1.8 Attach 8 Face-to-Face Meeting Guidance.pdf
357	2EC DR-05	N/A	Q01.1.8	N/A	2	1. COVID-19 Overview of Event and SoCal Response 9.24.20 Presentation 1.1. Sample of materials discussed during presentation SoCal Gas provided during COVID-19 crisis to: 1.1.8. Other Materials	SCOII_I1906014_2EC_DR_05-0502-0503 Q01.1.8 Attach 9 Social Distancing Guidance.pdf
358	2EC DR-05	N/A	Q02	N/A	9	Safety Survey results taken during COVID response	SCOII_I1906014_2EC_DR_05-0504-0512 Q02 CONFIDENTIAL Connected Voices_Workplace Safety Results Shareback.pdf
359	2EC DR-05	N/A	Q03	N/A	8	Minutes from Executive Safety Council from March 2020 through present	SCOII_I1906014_2EC_DR_05-0513-0520 Q03 CONFIDENTIAL Virtual ESC Minutes 9-3-20.pdf

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360	2EC DR-06	N/A	Q01	N/A	1	Document Review: Requested updated Organizational Chart and Employee Database	SCOII_I1906014_2EC_DR_06-0002 Q01 Attach 01 Employees by Level.xlsx
361	2EC DR-06	N/A	Q01	N/A	1	Document Review: Requested updated Organizational Chart and Employee Database	SCOII_I1906014_2EC_DR_06-0003 Q01 Attach 02 CONFIDENTIAL Excel Org Chart.xlsx
362	2EC DR-06	N/A	Q01	N/A	1	Document Review: Requested updated Organizational Chart and Employee Database	SCOII_I1906014_2EC_DR_06-0004 Q01 Attach 03 CONFIDENTIAL Reporting Levels.xlsx
363	2EC DR-06	N/A	Q01	N/A	1,343	Document Review: Requested updated Organizational Chart and Employee Database	SCOII_I1906014_2EC_DR_06-0005-1347 Q01 Attach 04 CONFIDENTIAL Org Chart 031221.pdf
364	2EC DR-07	N/A	Q01B	N/A	58	Q01 Safety Culture Order Instituting Investigation (OII) Question 01: Have SoCalGas's Board of Directors, executive leadership, and management prepared and implemented effective safety culture plans, risk-management plans, and policies and procedures to promote a high-functioning safety culture? **B. Please provide documents detailing safety culture definition, how it is developed and sustained within the organization.**	SCOII_I1906014_2EC_DR_07-0001-0058 Q01.B Attach 01 2021 SCG Gas Safety Plan.pdf
365	2EC DR-07	N/A	Q01B	N/A	39	Q01 Safety Culture Order Instituting Investigation (OII) Question 01: Have SoCalGas's Board of Directors, executive leadership, and management prepared and implemented effective safety culture	SCOII_I1906014_2EC_DR_07-0059-0097 Q01.B Attach 02 2020 SMS Plan.pdf

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						plans, risk-management plans, and policies and procedures to promote a high-functioning safety culture? **B. Please provide documents detailing safety culture definition, how it is developed and sustained within the organization.**	
366	2EC DR-07	N/A	Q01B	N/A	20	Q01 Safety Culture Order Instituting Investigation (OII) Question 01: Have SoCalGas's Board of Directors, executive leadership, and management prepared and implemented effective safety culture plans, risk-management plans, and policies and procedures to promote a high-functioning safety culture? **B. Please provide documents detailing safety culture definition, how it is developed and sustained within the organization.**	SCOII_I1906014_2EC_DR_07-0098-0117 Q01.B Attach 03 Confidential SMS 167.09.pdf
367	2EC DR-07	N/A	Q02A	N/A	11	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **A. Please provide documents listing safety-**	SCOII_I1906014_2EC_DR_07-0118-0128 Q02.A Attach 01 Confidential SCG Board Engag and Over.pdf

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						related education, training and experience for each current Board of Directors member of SoCal Gas and Sempra Energy.	
368	2EC DR-07	N/A	Q02A	N/A	1	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **A. Please provide documents listing safety-related education, training and experience for each current Board of Directors member of SoCal Gas and Sempra Energy.**	SCOII_I1906014_2EC_DR_07-0129 Q02.A Attach 02 Statement Safety Update.pdf
369	2EC DR-07	N/A	Q02A	N/A	6	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **A. Please provide documents listing safety-**	SCOII_I1906014_2EC_DR_07-0130-0135 Q02.A Attach 03 Confidential SCG Safety Advisory 11_20_2019.pdf

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						related education, training and experience for each current Board of Directors member of SoCal Gas and Sempra Energy.	
370	2EC DR-07	N/A	Q02A	N/A	3	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **A. Please provide documents listing safety-related education, training and experience for each current Board of Directors member of SoCal Gas and Sempra Energy.**	SCOII_I1906014_2EC_DR_07-0136-0138 Q02.A Attach 04 Confidential SCG 2019 Goals.pdf
371	2EC DR-07	N/A	Q02A	N/A	1	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **A. Please provide documents listing safety-**	SCOII_I1906014_2EC_DR_07-0139 Q02.A Attach 05 Confidential SCG 2020 Goals.pdf

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						related education, training and experience for each current Board of Directors member of SoCal Gas and Sempra Energy.	
372	2EC DR-07	N/A	Q02A	N/A	17	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **A. Please provide documents listing safety-related education, training and experience for each current Board of Directors member of SoCal Gas and Sempra Energy.**	SCOII_I1906014_2EC_DR_07-0140-0156 Q02.A Attach 06 Confidential SCG 2018 Risk Update.pdf
373	2EC DR-07	N/A	Q02A	N/A	12	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **A. Please provide documents listing safety-**	SCOII_I1906014_2EC_DR_07-0157-0168 Q02.A Attach 07 Confidential SCG 2020 Risk Update.pdf

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						related education, training and experience for each current Board of Directors member of SoCal Gas and Sempra Energy.	
374	2EC DR-07	N/A	Q02A	N/A	15	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **A. Please provide documents listing safety-related education, training and experience for each current Board of Directors member of SoCal Gas and Sempra Energy.**	SCOII_I1906014_2EC_DR_07-0169-0183 Q02.A Attach 08 Confidential SCG Compliance 2019.pdf
375	2EC DR-07	N/A	Q02A	N/A	23	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **A. Please provide documents listing safety-**	SCOII_I1906014_2EC_DR_07-0184-0206 Q02.A Attach 09 Confidential SCG Compliance 2020.pdf

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						related education, training and experience for each current Board of Directors member of SoCal Gas and Sempra Energy.	
376	2EC DR-07	N/A	Q02A	N/A	12	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **A. Please provide documents listing safety-related education, training and experience for each current Board of Directors member of SoCal Gas and Sempra Energy.**	SCOII_I1906014_2EC_DR_07-0207-0218 Q02.A Attach 10 Confidential 2017 ESCMP.pdf
377	2EC DR-07	N/A	Q02A	N/A	11	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **A. Please provide documents listing safety-**	SCOII_I1906014_2EC_DR_07-0219-0229 Q02.A Attach 11 Confidential SCG ESCMP_2018.pdf

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
						related education, training and experience for each current Board of Directors member of SoCal Gas and Sempra Energy.	
378	2EC DR-07	N/A	Q02A	N/A	11	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **A. Please provide documents listing safety-related education, training and experience for each current Board of Directors member of SoCal Gas and Sempra Energy.**	SCOII_I1906014_2EC_DR_07-0230-0240 Q02.A Attach 12 Confidential SCG_ESCMP_2019.pdf
379	2EC DR-07	N/A	Q02A	N/A	11	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **A. Please provide documents listing safety-**	SCOII_I1906014_2EC_DR_07-0241-0251 Q02.A Attach 13 Confidential SCG_ESCMP_2020.pdf

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						related education, training and experience for each current Board of Directors member of SoCal Gas and Sempra Energy.	
380	2EC DR-07	N/A	Q02B	N/A	9	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **B. Please provide documents explaining how the Board directly aligns specific safety governance directives to operational needs of SoCal Gas to ensure overall safety policies and objectives are achieved annually.**	SCOII_I1906014_2EC_DR_07-0252-0260 Q02.B Attach 01 Confidential SCG 2021 ICP Plan Summary.pdf
381	2EC DR-07	N/A	Q02B	N/A	9	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **B. Please**	SCOII_I1906014_2EC_DR_07-0261-0269 Q02.B Attach 02 Confidential SCG Approval and Commit. Policy.pdf

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
						provide documents explaining how the Board directly aligns specific safety governance directives to operational needs of SoCal Gas to ensure overall safety policies and objectives are achieved annually.	
382	2EC DR-07	N/A	Q02B	N/A	3	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **B. Please provide documents explaining how the Board directly aligns specific safety governance directives to operational needs of SoCal Gas to ensure overall safety policies and objectives are achieved annually.**	SCOII_I1906014_2EC_DR_07-0270-0272 Q02.B Attach 03 SCG Safety Committee Charter.pdf
383	2EC DR-07	N/A	Q02B	N/A	13	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of	SCOII_I1906014_2EC_DR_07-0273-0285 Q02.B Attach 04 SCG Advisory Safety Council Charter.pdf

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
						SoCalGas and best practices? **B. Please provide documents explaining how the Board directly aligns specific safety governance directives to operational needs of SoCal Gas to ensure overall safety policies and objectives are achieved annually.**	
383.1	2EC DR-07	N/A	Q02B	N/A	N/A	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **B. Please provide documents explaining how the Board directly aligns specific safety governance directives to operational needs of SoCal Gas to ensure overall safety policies and objectives are achieved annually.**	SCOII_I1906014_2EC_DR_04-3640-3647 Q03.5 Attach 02 CONFIDENTIAL SoCalGas 2020 ICP Plan Summary.pdf
384	2EC DR-07	N/A	Q02C	N/A	7	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety	SCOII_I1906014_2EC_DR_07-0286-0292 Q02.C Attach 01 Confidential ESCMP Policy.pdf

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
						governance and operational needs of SoCalGas and best practices? **C. Please send industry best practice documents at BOD level for safety governance that Sempra or SoCal Gas adhere to?**	
385	2EC DR-07	N/A	Q02C	N/A	39	Q02 Safety Culture Order Instituting Investigation (OII) Question 02: What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and SEMPRA Energy? How do the current board composites align with safety governance and operational needs of SoCalGas and best practices? **C. Please send industry best practice documents at BOD level for safety governance that Sempra or SoCal Gas adhere to?**	SCOII_I1906014_2EC_DR_07-0293-0331 Q02.C Attach 02 2020 SMS Plan.pdf
386	2EC DR-07	N/A	Q03	N/A	91	Safety Culture Order Instituting Investigation (OII) Question 03: What type and quality of management, governance, and accountability metrics and measures will ensure that SoCalGas will optimize its resources to ensure a high-functioning safety culture, consistent with its safety culture plans, policies and procedures, organizational management, governance rules, reporting and operating structure, size and geographic reach, and other factors?	SCOII_I1906014_2EC_DR_07-0332-0422 Q03 Attach 01 SCG 2020 Safety Perform Report.pdf

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387	2EC DR-07	N/A	Q03	N/A	1	Safety Culture Order Instituting Investigation (OII) Question 03: What type and quality of management, governance, and accountability metrics and measures will ensure that SoCalGas will optimize its resources to ensure a high-functioning safety culture, consistent with its safety culture plans, policies and procedures, organizational management, governance rules, reporting and operating structure, size and geographic reach, and other factors?	SCOII_I1906014_2EC_DR_07-0423 Q03 Attach 02 Attach B SCG 2020 Metric Data.xlsx
388	2EC DR-07	N/A	Q03	N/A	4	Safety Culture Order Instituting Investigation (OII) Question 03: What type and quality of management, governance, and accountability metrics and measures will ensure that SoCalGas will optimize its resources to ensure a high-functioning safety culture, consistent with its safety culture plans, policies and procedures, organizational management, governance rules, reporting and operating structure, size and geographic reach, and other factors?	SCOII_I1906014_2EC_DR_07-0424-0427 Q03 Attach 03 2021 Confidential SMS Opp for Cont Improverment

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388.1	2EC DR-07	N/A	Q03 Q04 Q08	N/A	N/A	Safety Culture Order Instituting Investigation (OII) Question 03: What type and quality of management, governance, and accountability metrics and measures will ensure that SoCalGas will optimize its resources to ensure a high-functioning safety culture, consistent with its safety culture plans, policies and procedures, organizational management, governance rules, reporting and operating structure, size and geographic reach, and other factors? Safety Culture Order Instituting Investigation (OII) Question 04: How does SoCalGas react organizationally – in terms of leadership, management, governance, policy development, communication with regulatory agencies, and risk management –when a significant safety event occurs? Safety Culture Order Instituting Investigation (OII) Question 08: How are safety values communicated and carried out vertically within SoCalGas and Sempra Energy?	SCOII_I1906014_2EC_DR_04-2966-3204 Q03.1 Attach 03 CONFIDENTIAL IIPP Manual.pdf

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389	2EC DR-07	N/A	Q04	N/A	32	Safety Culture Order Instituting Investigation (OII) Question 04: How does SoCalGas react organizationally – in terms of leadership, management, governance, policy development, communication with regulatory agencies, and risk management –when a significant safety event occurs?	SCOII_I1906014_2EC_DR_07-0428-0459 Q04 Attach 01 Confidential ER-1
390	2EC DR-07	N/A	Q04	N/A	54	Safety Culture Order Instituting Investigation (OII) Question 04: How does SoCalGas react organizationally – in terms of leadership, management, governance, policy development, communication with regulatory agencies, and risk management –when a significant safety event occurs?	SCOII_I1906014_2EC_DR_07-0460-0513 Q04 Attach 02 Confidential SCG_EOC_ICS_RESOURCEGUIDE
391	2EC DR-07	N/A	Q04	N/A	8	Safety Culture Order Instituting Investigation (OII) Question 04: How does SoCalGas react organizationally – in terms of leadership, management, governance, policy development, communication with regulatory agencies, and risk management –when a significant safety event occurs?	SCOII_I1906014_2EC_DR_07-0514-0521 Q04 Attach 03 Confidential Business Resumption Policy
392	2EC DR-07	N/A	Q04	N/A	4	Safety Culture Order Instituting Investigation (OII) Question 04: How does SoCalGas react organizationally – in terms of leadership, management, governance, policy development,	SCOII_I1906014_2EC_DR_07-0522-0525 Q04 Attach 04 Confidential GS 183.0102

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						communication with regulatory agencies, and risk management –when a significant safety event occurs?	
393	2EC DR-07	N/A	Q04	N/A	14	Safety Culture Order Instituting Investigation (OII) Question 04: How does SoCalGas react organizationally – in terms of leadership, management, governance, policy development, communication with regulatory agencies, and risk management –when a significant safety event occurs?	SCOII_I1906014_2EC_DR_07-0526-0539 Q04 Attach 05 Confidential GS 183.05
393.1	2EC DR-07	N/A	Q04	N/A	N/A	Safety Culture Order Instituting Investigation (OII) Question 04: How does SoCalGas react organizationally – in terms of leadership, management, governance, policy development, communication with regulatory agencies, and risk management –when a significant safety event occurs?	SCOII_I1906014_2EC_DR_04-3978-3994 Q03.8 Attach-J 04 CONFIDENTIAL Std 223.0030 Failure Analys Process.pdf
393.2	2EC DR-07	N/A	Q04	N/A	N/A	Safety Culture Order Instituting Investigation (OII) Question 04: How does SoCalGas react organizationally – in terms of leadership, management, governance, policy development, communication with regulatory agencies, and risk management –when a significant safety event occurs?	SCOII_I1906014_2EC_DR_04-5495-5498 Q06.1 Attach 01 CONFIDENTIAL Std 191.01 Safety Invg Pipe Failures.pdf

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393.3	2EC DR-07	N/A	Q04	N/A	N/A	Safety Culture Order Instituting Investigation (OII) Question 04: How does SoCalGas react organizationally – in terms of leadership, management, governance, policy development, communication with regulatory agencies, and risk management –when a significant safety event occurs?	SCOII_I1906014_2EC_DR_04-5499-5514 Q06.1 Attach 02 CONFIDENTIAL Std 223.0032 Pipeline Safety Compl.pdf
394	2EC DR-07	N/A	Q05	N/A	19	Safety Culture Order Instituting Investigation (OII) Question 05: How does SoCalGas react organizationally when the Commission institutes an investigation into alleged violations?	SCOII_I1906014_2EC_DR_07-0540-0558 Q05 Attach 01 SCG Response to I1906014
395	2EC DR-07	N/A	Q05	N/A	40	Safety Culture Order Instituting Investigation (OII) Question 05: How does SoCalGas react organizationally when the Commission institutes an investigation into alleged violations?	SCOII_I1906014_2EC_DR_07-0559-0598 Q05 Attach 02 CodeofBusinessConduct-2020
396	2EC DR-07	N/A	Q06	N/A	8	Safety Culture Order Instituting Investigation (OII) Question 06: How does SoCalGas react organizationally when Commission staff investigates a significant safety event or conducts routine safety inspections of the utility?	SCOII_I1906014_2EC_DR_07-0599-0606 Q06 Attach 01 SED Closure Letter_SoCalGas NOPV L235 West
397	2EC DR-07	N/A	Q08	N/A	9	Safety Culture Order Instituting Investigation (OII) Question 08: How are safety values communicated and carried out vertically within SoCalGas and Sempra Energy?	SCOII_I1906014_2EC_DR_07-0607-0615 Q08 Attach 01 2021 SCG Safety Recognition Plan

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398	2EC DR-07	N/A	Q08	N/A	1	Safety Culture Order Instituting Investigation (OII) Question 08: How are safety values communicated and carried out vertically within SoCalGas and Sempra Energy?	SCOII_I1906014_2EC_DR_07-0616 Q08 Attach 02 FINAL-2020 Safety Recognition Video
399	2EC DR-07	N/A	Q08	N/A	1	Safety Culture Order Instituting Investigation (OII) Question 08: How are safety values communicated and carried out vertically within SoCalGas and Sempra Energy?	SCOII_I1906014_2EC_DR_07-0617 Q08 Attach 03 FINAL_SMS Risk Management Video
400	2EC DR-07	N/A	Q08	N/A	2	Safety Culture Order Instituting Investigation (OII) Question 08: How are safety values communicated and carried out vertically within SoCalGas and Sempra Energy?	SCOII_I1906014_2EC_DR_07-0618-0619 Q08 Attach 04 Exec Comm 2020 Safety Results Feb2021
401	2EC DR-07	N/A	Q08	N/A	15	Safety Culture Order Instituting Investigation (OII) Question 08: How are safety values communicated and carried out vertically within SoCalGas and Sempra Energy?	SCOII_I1906014_2EC_DR_07-0620-0634 Q08 Attach 05 Confidential 2020 SCG Safety Campaign Report
402	2EC DR-07	N/A	Q08	N/A	1	Safety Culture Order Instituting Investigation (OII) Question 08: How are safety values communicated and carried out vertically within SoCalGas and Sempra Energy?	SCOII_I1906014_2EC_DR_07-0635 Q08 Attach 06 SCG_CloseCallForm
403	2EC DR-07	N/A	Q08	N/A	1	Safety Culture Order Instituting Investigation (OII) Question 08: How are safety values communicated and carried	SCOII_I1906014_2EC_DR_07-0636 Q08 Attach 07 SOAR Intranet Webpage

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						out vertically within SoCalGas and Sempra Energy?	
404	2EC DR-07	N/A	Q08	N/A	2	Safety Culture Order Instituting Investigation (OII) Question 08: How are safety values communicated and carried out vertically within SoCalGas and Sempra Energy?	SCOII_I1906014_2EC_DR_07-0637-0638 Q08 Attach 08 Stop the Job Submittal Form
404.1	2EC DR-07	N/A	Q08	N/A	N/A	Safety Culture Order Instituting Investigation (OII) Question 08: How are safety values communicated and carried out vertically within SoCalGas and Sempra Energy?	SCOII_I1906014_2EC_DR_04-3628-3630 Q03.4 Attach 01 CONFIDENTIAL Ethics Compliance Rep Inv Policy.pdf
404.2	2EC DR-07	N/A	Q08	N/A	N/A	Safety Culture Order Instituting Investigation (OII) Question 08: How are safety values communicated and carried out vertically within SoCalGas and Sempra Energy?	SCOII_I1906014_2EC_DR_04-3631-3635 Q03.4 Attach 02 FAQ SEMPRA Navex EC Helpline.pdf
405	2EC DR-07	N/A	Q09	N/A	7	Safety Culture Order Instituting Investigation (OII) Question 09: What qualities, factors, and metrics should be used to define, promote, and measure the effectiveness of SoCalGas's and Sempra Energy's safety culture?	SCOII_I1906014_2EC_DR_07-0639-0645 Q09 Attach 01 Confidential Safety Culture Assess Proc
405.1	2EC DR-07	N/A	Q09	N/A	N/A	Safety Culture Order Instituting Investigation (OII) Question 09: What qualities, factors, and metrics should be used to define, promote, and measure the effectiveness of SoCalGas's and Sempra Energy's safety culture?	SCOII_I1906014_2EC_DR_04-2269-2333 Q02.4 Attach 15 CONFIDENTIAL Safety Barometer Surv Rslt 2013.pdf

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405.2	2EC DR-07	N/A	Q09	N/A	N/A	Safety Culture Order Instituting Investigation (OII) Question 09: What qualities, factors, and metrics should be used to define, promote, and measure the effectiveness of SoCalGas's and Sempra Energy's safety culture?	SCOII_I1906014_2EC_DR_04-2334-2409 Q02.4 Attach 16 CONFIDENTIAL Safety Barometer Surv Rslt 2016.pdf
405.3	2EC DR-07	N/A	Q09	N/A	N/A	Safety Culture Order Instituting Investigation (OII) Question 09: What qualities, factors, and metrics should be used to define, promote, and measure the effectiveness of SoCalGas's and Sempra Energy's safety culture?	SCOII_I1906014_2EC_DR_04-2410-2508 Q02.4 Attach 17 CONFIDENTIAL Safety Barometer Surv Rslt 2018.pdf
406	2EC DR-08	N/A	Q01	N/A	1	Requested updated Organizational Chart and Employee Database	SCOII_I1906014_2EC_DR_08-0002 Q01 Attach 01 Employees by Level.xlsx
407	2EC DR-08	N/A	Q01	N/A	1	Requested updated Organizational Chart and Employee Database	SCOII_I1906014_2EC_DR_08-0003 Q01 Attach 02 CONFIDENTIAL Excel Org Chart.xlsx
408	2EC DR-08	N/A	Q01	N/A	1	Requested updated Organizational Chart and Employee Database	SCOII_I1906014_2EC_DR_08-0004 Q01 Attach 03 CONFIDENTIAL Reporting Levels.xlsx
409	2EC DR-08	N/A	Q01	N/A	1,441	Requested updated Organizational Chart and Employee Database	SCOII_I1906014_2EC_DR_08-0005-1445 Q01 Attach 04 CONFIDENTIAL Org Chart 060121.pdf
410	2EC DR-09	N/A	Q01	N/A	1	Lessons Learned from SoCalGas Site Visit, May 17 – May 22, 2021 (Need to see documentation of incidents, near misses, prior to and during July 2021)	SCOII_I1906014_2EC_DR_09 Q01-0002 Confidential Attach 01 S 2021 Close Calls Supplemental.xlsx

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411	2EC DR-09	N/A	Q01	N/A	1	Lessons Learned from SoCalGas Site Visit, May 17 – May 22, 2021 (Need to see documentation of incidents, near misses, prior to and during July 2021)	SCOII_I1906014_2EC_DR_09 Q01-0003 Confidential Attach 02S 2021 Safety Incidents Supplemental.xlsx
412	2EC DR-09	N/A	Q01	N/A	8	Lessons Learned from SoCalGas Site Visit, May 17 – May 22, 2021 (Need to see documentation of incidents, near misses, prior to and during July 2021)	SCOII_I1906014_2EC_DR_09 Q01-0004-0011 Confidential Attach 03 SCG-Safety-Dashboard.pdf
413	2EC DR-10	N/A	Q01	N/A	34	From Interview for QA/QC Manager, Dina Chanysheva, on July 19, 2021. Provide presentation showing all quality groups per QA/QC Manager	SCOII_I1906014_2EC_DR_10-0002-0035 Q01 Confidential Attach 01.pdf
414	2EC DR-11	N/A	Q01	N/A	19	From Observation/Walkthrough of Pico Rivera, Engineering Analysis Center (EAC), on July 19, 2021: Provide "Hydrogen Project Schedule in phases."	SCOII_I1906014_2EC_DR_11-0003-0021 Q01 Attach 01 Ch. 3 Testimony (Petrizzo) Hydrogen Blending Demo Program.pdf
415	2EC DR-11	N/A	Q01	N/A	39	From Observation/Walkthrough of Pico Rivera, Engineering Analysis Center (EAC), on July 19, 2021: Provide "Hydrogen Project Schedule in phases."	SCOII_I1906014_2EC_DR_11-0022-0060 Q01 Attach 02 Ch. 4 Testimony (Lang, McQuilling, and Woo) Technical.pdf
416	2EC DR-11	N/A	Q02	N/A	4	Provide a list of SoCalGas acronyms for represented employee positions.	SCOII_I1906014_2EC_DR_11-0061-0064 Q02 Attach 01 SoCalGas Represented Job Titles.pdf
417	2EC DR-11	N/A	Q02	N/A	17	Provide a list of SoCalGas acronyms for represented employee positions.	SCOII_I1906014_2EC_DR_11-0065-0081 Q02 Attach 02 SoCalGas Acronyms List 072221.pdf
418	2EC DR-12	N/A	Q01	N/A	6	Provide changes to call center protocol post-covid for call center staff regarding	SCOII_I1906014_2EC_DR_12-0002-0007 Q01 Confidential Attach 01.pdf

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						covid screening questions for orders (e.g. report of the smell of gas).	
419	2EC DR-13	N/A	Q01	N/A	13	Please provide additional information on SoCalGas' Advisory Safety Council.	SCOII_I1906014_2EC_DR_13-0004-0016 Q01 Attach 01 CONFIDENTIAL SCG Advisory Safety Council Charter Adopted 12172020.pdf
420	2EC DR-13	N/A	Q01	N/A	15	Please provide additional information on SoCalGas' Advisory Safety Council.	SCOII_I1906014_2EC_DR_13-0017-0031 Q01 Attach 02 CONFIDENTIAL Adv Safety Council Onboarding and Intro PPT.pdf
421	2EC DR-13	N/A	Q02	N/A	16	Please provide preliminary results from SoCalGas' American Petroleum Institute (API) Safety Management System (SMS) Maturity Assessment.	SCOII_I1906014_2EC_DR_13-0032-0047 Q02 Attach 01 CONFIDENTIAL API Preliminary Presentation.pdf
422	2EC DR-14	N/A	Q01	N/A	19	Please provide the following items: *Leak Identification and Classification Gas Standard Followed by Distribution Operations * Customer Services Checklist identified at Palm Desert base * Final Day Presentations from Friday, July 30, 2021	SCOII_I1906014_2EC_DR_14-0002-0020 Q01 Attach 01 Confidential 223.0125 GS Leakage Coding.pdf
423	2EC DR-14	N/A	Q01	N/A	2	Please provide the following items: *Leak Identification and Classification Gas Standard Followed by Distribution Operations * Customer Services Checklist identified at Palm Desert base	SCOII_I1906014_2EC_DR_14-0021-0022 Q01 Attach 02 CS Checklist.pdf

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						* Final Day Presentations from Friday, July 30, 2021	
424	2EC DR-14	N/A	Q01	N/A	28	Please provide the following items: *Leak Identification and Classification Gas Standard Followed by Distribution Operations * Customer Services Checklist identified at Palm Desert base * Final Day Presentations from Friday, July 30, 2021	SCOII_I1906014_2EC_DR_14-0023-0050 Q01 Attach 03 Confidential IMP Overview.pdf
425	2EC DR-14	N/A	Q01	N/A	16	Please provide the following items: *Leak Identification and Classification Gas Standard Followed by Distribution Operations * Customer Services Checklist identified at Palm Desert base * Final Day Presentations from Friday, July 30, 2021	SCOII_I1906014_2EC_DR_14-0051-0066 Q01 Attach 04 Confidential AAR-Curtailment-Watch.pdf
426	2EC DR-14	N/A	Q01	N/A	1	Please provide the following items: *Leak Identification and Classification Gas Standard Followed by Distribution Operations * Customer Services Checklist identified at Palm Desert base * Final Day Presentations from Friday, July 30, 2021	SCOII_I1906014_2EC_DR_14-0067 Q01 Attach 05 Confidential Safety_Dashbaord_073021.pdf

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427	2EC DR-14	N/A	Q01	N/A	5	Please provide the following items: *Leak Identification and Classification Gas Standard Followed by Distribution Operations * Customer Services Checklist identified at Palm Desert base * Final Day Presentations from Friday, July 30, 2021	SCOII_I1906014_2EC_DR_14-0068-0072 Q01 Attach 06 Safety Dept Highlights 073021.pdf
428	2EC DR-14	N/A	Q01	N/A	7	Please provide the following items: *Leak Identification and Classification Gas Standard Followed by Distribution Operations * Customer Services Checklist identified at Palm Desert base * Final Day Presentations from Friday, July 30, 2021	SCOII_I1906014_2EC_DR_14-0073-0079 Q01 Attach 07 Confidential Contractor Safety Program 07.30.21.pdf
429	2EC DR-14	N/A	Q01	N/A	12	Please provide the following items: *Leak Identification and Classification Gas Standard Followed by Distribution Operations * Customer Services Checklist identified at Palm Desert base * Final Day Presentations from Friday, July 30, 2021	SCOII_I1906014_2EC_DR_14-0080-0091 Q01 Attach 08 Document_Library Presentation 2EC.pdf
430	2EC DR-14	N/A	Q01	N/A	11	Please provide the following items:*Leak Identification and Classification Gas Standard Followed by Distribution Operations* Customer Services Checklist	SCOII_I1906014_2EC_DR_14-0092-0102 Q01 Attach 09 Public Awareness Program 2021.pdf

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						identified at Palm Desert base * Final Day Presentations from Friday, July 30, 2021	
431	2EC DR-14	N/A	Q01	N/A	13	Please provide the following items: *Leak Identification and Classification Gas Standard Followed by Distribution Operations * Customer Services Checklist identified at Palm Desert base * Final Day Presentations from Friday, July 30, 2021	SCOII_I1906014_2EC_DR_14-0103-115 Q01 Attach 10 Confidential Damage Prevention Prog 2021.pdf
432	2EC DR-15	N/A	Q01	N/A	8	Please provide the following items: L 235-2 Incident Investigation Report	SCOII_I1906014_2EC_DR_07-0599-0606 Q06 Attach 01 SED Closure Letter_SoCalGas NOPV L235 West.pdf
433	2EC DR-15	N/A	Q01	N/A	1	Please provide the following items: L 235-2 Incident Investigation Report	SCOII_I1906014_2EC_DR_15-0002 Q01 Attach 01 L235W Letter to SED.pdf
434	2EC DR-15	N/A	Q01	N/A	130	Please provide the following items: L 235-2 Incident Investigation Report	SCOII_I1906014_2EC_DR_15-0003-0132 Q01 Attach 02 Confidential SCG L235W RCA Final Report.pdf
435	2EC DR-15	N/A	Q01	N/A	21	Please provide the following items: L 235-2 Incident Investigation Report	SCOII_I1906014_2EC_DR_15-0133-0153 Q01 Attach 03 L235W Confidential Corrosion Rel Analysis.pdf
436	2EC DR-16	N/A	Q01	N/A	27	Please provide the following items: 2021 Functional Exercise Emergency Management Exercise After Action Report	SCOII_I1906014_2EC_DR_16-0001-0027 Q01 Attach 01 Confidential SCG Exercise After Action Report

#	Data Request #	Batch #	Q #	Sub-Category	# of Pages	Question	Attachment Name
437	2EC DR-17	N/A	Q01	N/A	3	Please provide the following items: SoCalGas Management of Change Roadmap	SCOII_I1906014_2EC_DR_17-0002-0004 Q01 Attach 01 SCG MOC Roadmap
					12,574	**Pages**	

Appendix E: Response to OII Questions

The OII (I.19-06-014) to determine whether SoCalGas's and Sempra Energy's organizational culture and governance prioritize safety (U904G), proposed specific questions for the safety culture assessment. The questions focus on cultural artifacts, and they may not accurately represent the culture. The specific questions are therefore addressed in the table below and are identified in the result section with the letter "D". The responses provided here are descriptive facts and not evaluative answers. The assessment of these responses to the questions are integrated into the cultural analysis. The best effort to obtain information to answer these questions was made and in some cases the information available was limited.

Table 1: Response to OII questions

OII Questions	Response
1. Have SoCalGas's Board of Directors, executive leadership, and management prepared and implemented effective safety culture plans, risk-management plans, and policies and procedures to promote a high-functioning safety culture?	The safety culture assessment report addresses this question by providing an overall assessment of the SoCalGas safety culture. Overall, SoCalGas does not have an overarching system that ties effective safety culture plans, risk management plans/audits and operational policies and procedures together. Additionally, there have not been any enterprise risk management audits in the last 3 years, the risk registers are general in nature and do not address system infrastructure condition risk. The SMS plan is still in the process of being implemented and there also exists a Gas Safety Plan, which details management's safety performance expectations. The RAMP process, which addresses some ERM type issues, largely seems to be a standalone process and tied to the GRC regulatory process. The Company indicates it does not have a working definition of "safety culture".
2. What type and quality of safety-related education, training and experience is present with current Board of Directors of SoCalGas and Sempra Energy? How do the current board composites align with safety governance and	Training on a systemic approach to safety and safety culture is not evident The Board has various levels of safety related education, training, and experience and largely its role is to review and monitor safety performance, which has been

OII Questions	Response
operational needs of SoCalGas and best practices?	identified in this assessment as largely personnel safety. The Board does not direct daily operations and safety activities.
3. What type and quality of management, governance, and accountability metrics and measures will ensure that SoCalGas will optimize its resources to ensure a high-functioning safety culture, consistent with its safety culture plans, policies and procedures, organizational management, governance rules, reporting and operating structure, size and geographic reach, and other factors?	The safety culture assessment report addresses this question in general as these specific issues all contribute to the overall safety culture. Considering the contribution of each specific issue (e.g., quality of management metrics) independently is inconsistent with a systemic approach and a comprehensive safety culture assessment. The Company does not have an overall integrated management plan or governance system to ensure the optimization of its resources to ensure a healthy safety culture. The Company maintains the SMS that provides management oversight but its focus is centered around compliance with the 10 elements of API 1173
4. How does SoCalGas react organizationally – in terms of leadership, management, governance, policy development, communication with regulatory agencies, and risk management – when a significant safety event occurs?	This issue was addressed within the safety culture assessment. In general, SoCalGas adopts a reactive approach by addressing the immediate causes. The Company indicated the SMS Plan, Gas Safety Plan, Gas Standard 183.05 as examples of how it reacts with regulatory agencies when significant safety events occur. While these documents address topics as safety management and emergency response internally, they do not appear to address specifically leadership management, governance, policy development, risk management and communication with regulatory agencies.
5. How does SoCalGas react organizationally when the Commission institutes an investigation into alleged violations?	They cooperate with the CPUC.CPUC investigations are managed by the Company's Regulatory Affairs group. Internal communication around violations and events was described by interviewees as lacking.

OII Questions	Response
6. How does SoCalGas react organizationally when Commission staff investigates a significant safety event or conducts routine safety inspections of the utility?	They cooperate with the CPUC. CPUC investigations of a significant safety event or routine safety inspections are managed by the Company's Regulatory Affairs group. Similar to question 5, internal communication around events or inspection results are often delayed or lacking.
7. To what degree do the Boards of Directors of SoCalGas and the Sempra Energy weigh SoCalGas's safety record when they approve executives' and managers' compensation packages, incentives, and accountability metrics and measures, including any remuneration when the employment or agency relationship is terminated or ended? To what degree do the Boards of Directors weigh an individual executive's safety record and risk management record when it considers promoting or appointing executives and Board members?	Company has safety incentives focused on personnel safety, e.g. loss time incidents, motor vehicle incidents, that comprise 50% of management's and 40% of non-management's compensation. Additional incentives are discretionary and may or may not be safety related. Union employees are exempt from such safety incentives.
8. How are safety values communicated and carried out vertically within SoCalGas and Sempra Energy?	They use multiple methods to communicate about safety including newsletters and meetings. The Company indicated it communicates its safety values through the SMS Plan, the Gas Safety Plan, Injury, Illness Prevention Plan and Internal and External Communication plans, other tools and activities.
9. What qualities, factors, and metrics should be used to define, promote, and measure the effectiveness of SoCalGas's and Sempra Energy's safety culture?	The SMS plan defines values similar to the 10 elements of API 1173 but does not detail specific metrics that are given to define, promote and measure the effectiveness of the safety culture.

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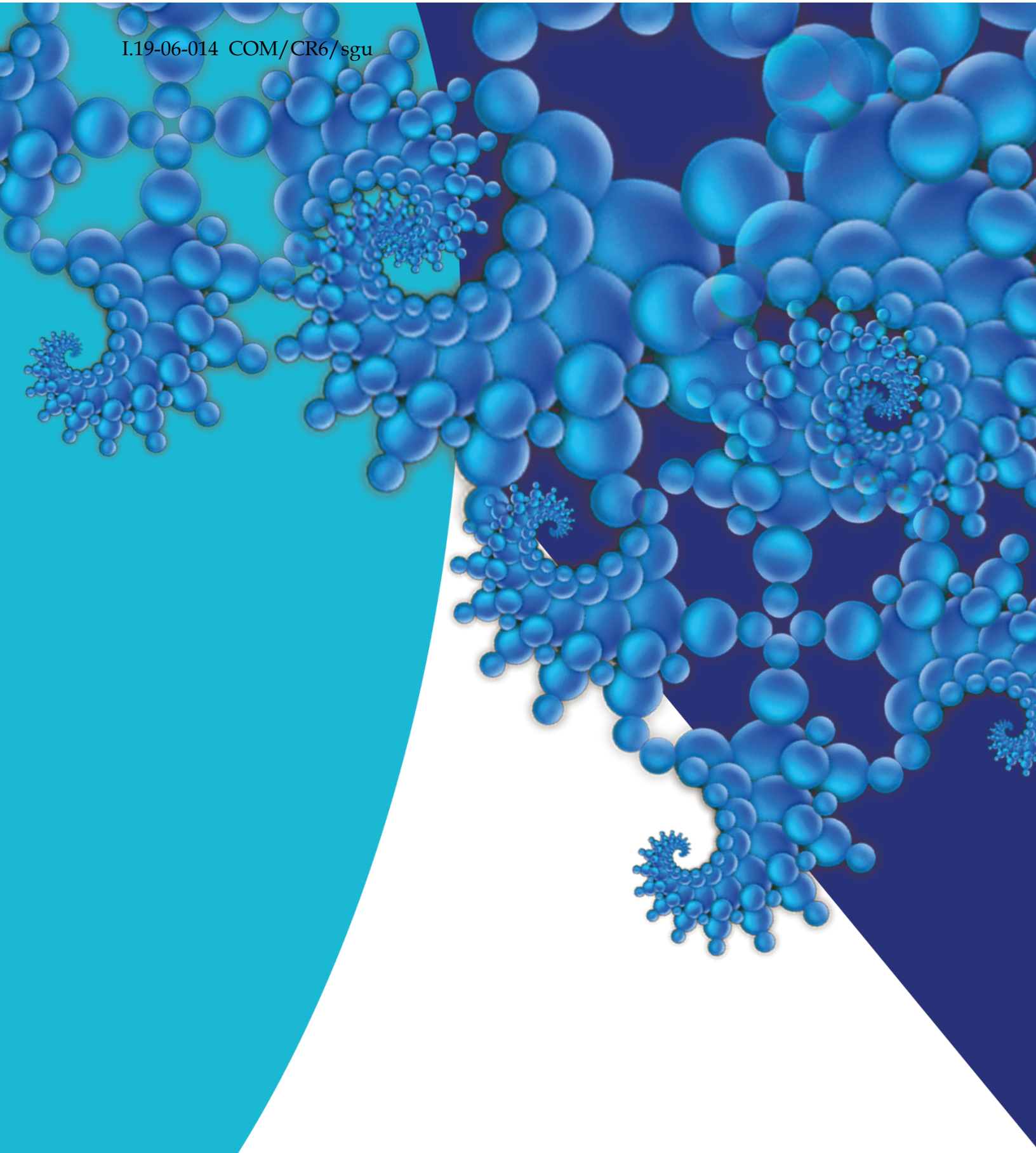

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