

OSA-SEU DATA REQUEST-001
SOCALGAS- SDG&E 2019 GRC – A.17-11-007/8
DATE RECEIVED: MARCH 1, 2018
DATE RESPONDED: MARCH 21, 2018

1. **Safety Performance Measures:** Unless otherwise specified, please provide the following information broken down annually for each Utility and line of business, from 2010-2017. If data is not available for a particular year, please indicate so and explain why not. For items a-d, please provide the supporting raw data in excel or csv format with all the data fields required to calculate the measure in addition to any other data field requested in the specific item below. Provide a brief description of the data fields. If the information provided deviates from the request, please be sure to explain the “what” and “why” of the deviation.

SDG&E and SoCalGas Overview of Response:

The information in this response is confidential and protected materials pursuant to PUC Section 583, GO 66-C/D and D.17-09-023.

SoCalGas and SDG&E take a comprehensive approach to safety, which begins with the tone at the top. This is evidenced in the Direct Testimony of SDG&E Policy Overview witness Caroline Winn: “At SDG&E, safety isn’t a goal – it is part of the Company’s DNA. Nothing is more important than keeping our employees, contractors and the public safe” (Exhibit SDG&E-01 at p. CAW-1). This sentiment is echoed in the Revised Direct Testimony of SoCalGas Policy Overview witness Bret Lane (Exhibit SCG-01-R).

To evaluate their safety approaches, SoCalGas and SDG&E have identified, collected, reviewed, and reported on various safety performance measures, some of which are included in SoCalGas’ and SDG&E’s Interim Accountabilty Report (attached to their respective TY 2019 GRC Applications as Appendix A). SoCalGas and SDG&E are continuously refining their safety measures and metrics, to the extent that comparable and useful metrics are available, when analyzing their risks and as needed. Further, SoCalGas and SDG&E anticipate refining their metrics in the context of (1) preparing for and lessons learned from our accountability reporting, estimated to begin in 2020 in accordance with D.14-12-025; and (2) participating in the metric working groups efforts, which are currently underway in the Safety Model Assessment Proceeding (S-MAP), Application 15-05-002 (consolidated).

In addition to metrics, SoCalGas and SDG&E also utilize and take seriously their respective Safety Barometer Reports. These reports present the results of the SAFETY BAROMETER employee perception surveys, conducted among SDG&E and SoCalGas employees in both 2013 and 2016, and serve as another indicator of the safety focus and priority at both companies.

Please see the attached confidential copies of the 2013 and 2016 Safety Barometer Reports for SoCalGas and SDG&E.

Building on the foregoing, SoCalGas and SDG&E provide responses to OSA’s specific data request questions in the remainder of this document.

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SDG&E and SoCalGas Overview of Response:

With regard to the timing requested herein, SoCalGas/SDG&E object to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the timeframe encompassed in this request is not relevant to the subject matter involved in the pending proceeding and therefore, the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence. In particular, this request seeks information prior to 2012 and is thus, outside the scope of the relevant time period used by SoCalGas/SDG&E in developing its forecasts. Furthermore, the Occupational Safety & Health Administration's (OSHA) regulations require that the OSHA 300 Log, the privacy case list (if one exists), the annual summary, and the OSHA 301 Incident Report forms be saved for five (5) years, following the end of the calendar year that these records cover. Subject to and without waiving the foregoing objection, SoCalGas/SDG&E respond as follows:

As an overview of our response, the responses for Questions 1.a. – 1.d. are confined to measures related to employee safety.

Employee injuries, illnesses and motor vehicle incidents, near misses and facility safety inspections, along with related corrective actions, are recorded in the utilities' Safety Information Management System (SIMS), a component within the electronic SAP system.

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Question 1.a. Facility Safety Inspections: The total number of facility inspections conducted versus the total number of planned facility inspections for:

- i. each utility and line of business; and
- ii. each facility type. Explain if any facilities have been aggregated – do not aggregate unless it is technically prohibitive to do so.

List any facility types that were not included and explain why.

SDG&E and SoCalGas Response 1a:

For this response, we provide the numbers of facility safety inspections conducted per both the utilities' Environmental and Safety Compliance Management Program (ESCMP) and semiannual inspections during the year. Our ESCMP program is a top-down and bottom-up approach that requires support from all employees from various departments, including subject matter experts and is imbedded in our culture. The ESCMP Policy requires year-end certifications from the Vice Presidents, Directors and Managers, which provides assurance to the SDG&E and SoCalGas Presidents regarding the completion of the ESCMP, as well as compliance with the environmental and safety policies, procedures and standards over which he/she has responsibility. The SoCalGas and SDG&E Presidents certify to the Chief Compliance Officer of Sempra Energy regarding their organization's overall compliance with the environmental and safety policy and procedures.

The ESCMP safety inspections involve separate safety and environmental assessments which include reviews of facilities. The process is coordinated and supported by SDG&E and SoCalGas' Environmental Services and the Safety Department by working with designated environmental and safety representatives for each site. Additionally, each site has a designated site manager who is responsible for the execution of the self-assessments, completion of identified corrective actions, overall site compliance, and for completing the ESCMP checklists and year-end certification.

- i. Tables A1 and A2 below provide the total facility safety inspections planned and completed by company. Please note that SoCalGas and SDG&E do not identify facilities according to lines of business. These inspections exclude construction and maintenance routine inspections for our electric and gas equipment in the field. You can reference SDG&E and SoCalGas operating unit witness testimonies for further details.

Table A1. Total Facility Safety Inspections Planned for Completion

Company	2012	2013	2014	2015	2016	2017	Grand Total
SoCalGas	346	344	361	373	372	360	2,156
SDG&E	101	105	108	109	119	124	666
Grand Total	447	449	469	482	491	484	2,822

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SDG&E and SoCalGas Response 1a Continued:

Table A2. Total Facility Safety Inspections Completed

Company	2012	2013	2014	2015	2016	2017	Grand Total
SoCalGas	346	344	359	372	367	344	2,132
SDG&E	101	105	108	109	119	124	666
Grand Total	447	449	467	481	486	468	2,798

ii. For this response, we note that facilities have not been aggregated.

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Question 1.b. Corrective and Preventative (C&P) Actions: The total number of C&P actions¹ completed versus the total number of C&P actions identified for the calendar year for:

- i. operations and maintenance; and
- ii. construction.

Raw data: include other descriptor data fields used by the utility to describe, categorize (i.e. importance/priority), and classify the action.

Describe the C&P action program/s, explain what programs and activities are covered (i.e. may result in C&P actions), and list any programs and activities that are not counted or documented in the measure above or that do not result in corrective and preventative action.

Provide documentation of the C&P action program/s procedures employed by the utilities.

SDG&E and SoCalGas Response 1b:

For this response, we provide corrective action figures related to facility safety inspections that are identified through both the annual ESCMP inspections and semiannual facility inspections for each company. These inspections are not distinguished in the categories of operations, maintenance or construction. In addition, we have included corrective actions from our Sempra Energy Audit Services department where Sempra Energy (the parent company of SoCalGas and SDG&E) Audit Services performs internal audits of the utilities' facilities. These audits are conducted as if completed by a third party. The reports, findings and corrective actions are shared with senior leadership of the utilities and Sempra Energy. The corrective actions from these audits are provided below in Tables B3 and B4. Note: these corrective actions are tracked by Sempra Audit Services and are not recorded in the SIMS. Lastly, we included corrective actions captured for our OSHA-recordable injuries and illnesses and controllable motor vehicle incidents. All incidents are required to be entered electronically by supervision in the SIMS. Incidents are reported, investigated and assigned corrective actions if deemed necessary. Our Corrective Action totals are shown below in Table B5.

As previously mentioned, these exclude corrective actions captured from routine construction and maintenance inspections for our electric and gas equipment in the field.

Table B1. Total Facility-related Corrective Actions Planned in SIMS

Company	2012	2013	2014	2015	2016	2017	Grand Total
SoCalGas	409	259	290	261	283	305	1,807
SDG&E	169	158	137	120	115	69	768
Grand Total	578	417	427	381	398	374	2,575

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SDG&E and SoCalGas Response 1b Continued:

Table B2. Total Facility-related Corrective Actions Completed in SIMS

Company	2012	2013	2014	2015	2016	2017	Grand Total
SoCalGas	409	259	289	261	283	305	1,806
SDG&E	169	158	137	120	115	69	768
Grand Total	578	417	426	381	398	374	2,574

Table B3. Total Facility-related Corrective Actions Identified by Audit Services

Company	2012	2013	2014	2015	2016	2017	Grand Total
SoCalGas	0	2	4	1	3	0	10
SDG&E	0	3	5	8	7	3	26
Grand Total	0	7	9	9	10	3	38

Table B4. Total Facility-related Corrective Actions Completed per Audit Services Audits

Company	2012	2013	2014	2015	2016	2017	Grand Total
SoCalGas	0	2	4	1	3	0	10
SDG&E	0	3	5	8	7	3	26
Grand Total	0	7	9	9	10	3	38

Table B5. Total Corrective Actions Related to OSHA-recordables and CMVIs

Company	2012	2013	2014	2015	2016	2017	Grand Total
SoCalGas	711	880	857	824	780	620	4,672
SDG&E	198	177	153	116	126	105	875
Grand Total	909	1,057	1,010	940	906	725	5,547

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Question 1.c. *Near-misses*: The total number of near-misses¹ reviewed by a competent person² and addressed³ versus the total number of near misses reported by:

- i. the utility/line of business; and
- ii. contractors.

Raw data: include other descriptor data fields used by the utilities to describe, categorize (i.e. importance/priority, type), and classify the near-miss event.

Describe the near-miss event reporting program. Explain what programs and activities may report a near-miss and list any programs and activities that are not counted or documented in the measure above or may not report a near-miss report action.

Provide documentation of the near-miss event reporting and processing procedures employed by the utilities.

SDG&E and SoCalGas Response 1c:

i. Utility employees are encouraged to report near miss incidents. Means of reporting include formal and informal options, such as the SIMS, online anonymous forms, hard-copy submittal to supervisors, safety meetings held at the companies, as a portion of a non-safety meeting where safety discussions might arise, via distribution of safety performance documents and statistics, informally, during small group meetings with employees, through one of the various employee reporting tools (e.g., the Helpline or an employee survey), via informal emails, and in a safety-focused committee meeting. Formal near miss incidents are reviewed by Safety Services and reported weekly to management and supervisors. For this response, we note that SoCalGas and SDG&E do not identify near miss incidents according to lines of business.

Table C1 contains data on reported for total near misses for each utility from 2012 to 2017. There is not a consistent set of event descriptors used to categorize or classify these incidents.

See the attachment OSA-SEU-001 Q1c Attachment Near Misses for the raw data supporting Table C1.

¹ A near-miss is an undesired event that, under slightly different circumstances, could have resulted in harm to people, or damage to property, equipment, or the environment. These exclude incidents by other companies, the public, or third-parties, which are managed under the damage prevention program.

² Such as a person trained and experienced to conduct safety incident investigations.

³ A corrective and preventative action is an action that the company has determined is necessary based on findings from internal inspections, audits, and investigations.

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SDG&E and SoCalGas Response 1c:

Table C1. Total Utility Near Miss Incidents Reported

Company	2012	2013	2014	2015	2016	2017	Grand Total
SoCalGas	609	830	514	534	529	239	3,255
SDG&E	60	53	75	38	43	45	314
Grand Total	669	883	589	572	572	284	3,569

- ii. To date, tracking of contractor near miss incidents has been informal. As such, the requested data is unavailable. Beginning in 2018, SoCalGas and SDG&E now use ISNworld, the online platform provided by a third-party (ISN[®]), to formally track contractor incidents and injuries to ensure consistency and data integrity.

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Question 1.d. Incidents: The total number of safety-related incidents.

Raw data: include descriptor data fields used by the utilities to describe (e.g. facility/equipment/asset affected, consequence, injuries, fatalities etc.), classify e.g. “significant incidents”⁴, reportable incidents – and to whom), and categorize (e.g. type of incident, cause of incident, root cause analysis info (i.e. was one performed), corrective action if necessary and whether it was performed).

SDG&E and SoCalGas Response 1d:

For this response, SoCalGas and SDG&E use the following definitions:

Injury or illness is an incident meeting the Occupational Safety and Health Administration (OSHA) recordability criteria ("OSHA-recordable incident").

Lost-time incidents are OSHA-recordable incidents for which the employee sustains one or more days away from work due to the injury or illness.

Serious injury or illness is an incident meeting the following criteria as defined by Cal/OSHA: "any injury or illness occurring in a place of employment or in connection with any employment, which requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation or in which an employee suffers a loss of any member of the body or suffers any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by the commission of a Penal Code violation, except the violation of Section 385 of the Penal Code, or an accident on a public street or highway."

Reference: California Administrative Code, Section 330(h), Title 8,
<http://www.dir.ca.gov/title8/330.html>

Fatality refers to a work-related OSHA-recordable incident resulting an employee death.

Controllable Motor Vehicle Incident (CMVI) is an motor vehicle incident considered "controllable" (sometimes referred to as "preventable") if the driver failed to do everything that reasonably could have been done to avoid the collision.

All serious injuries and fatalities are reported to Cal/OSHA per Title 8 regulations, §342 (*Reporting Work-Connected Fatalities and Serious Injuries*).

⁴ In their Gas Safety plans submitted to the Safety and Enforcement Division in 2017, the Utilities mention “significant Company incidents and near-misses.”

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SDG&E and SoCalGas Response 1d Continued:

See the following attachments that include the raw data summarized in the tables provided below:

- OSA-SEU-001 Q1.d_1 Attachment OSHA Recordable_LTI supporting Tables D1, D2 and D3. Note that while the raw data for Table D3 is included, there is a separate analysis performed based on the circumstances of the incident to derive the outcome data presented.
- OSA-SEU-001 Q1.d_2 Attachment CMVIs supporting Table D4.
- OSA-SEU-001 Q1.d_3 Attachment Incident-CA supporting Table D5.

Table D1. Total OSHA-Recordable Injuries/Illnesses

Company	2012	2013	2014	2015	2016	2017	Grand Total
SoCalGas	242	264	281	298	255	257	1,597
SDG&E	120	114	102	86	92	87	601
Grand Total	362	378	383	384	347	344	2,198

Table D2. Total Lost-Time Incidents

Company	2012	2013	2014	2015	2016	2017	Grand Total
SoCalGas	119	117	109	126	93	74	638
SDG&E	44	39	36	31	32	23	205
Grand Total	163	156	145	157	125	97	843

Table D3. Total Serious Injuries and Fatalities

Company	Incident Type	2012	2013	2014	2015	2016	2017	Grand Total
SoCalGas	Serious Injury or Illness	1	4	1	0	1	2	9
	Fatality	0	0	0	0	0	0	0
SoCalGas Total		1	4	1	0	1	2	9
SDG&E	Serious Injury or Illness	2	3	4	2	1	0	12
	Fatality	0	0	0	1	0	0	1
SDG&E Total		2	3	4	3	1	0	13
Grand Total		3	7	5	3	2	2	22

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SDG&E and SoCalGas Response 1d Continued:

Table D4. Total Controllable Motor Vehicle Incidents (CMVIs)

Company	2012	2013	2014	2015	2016	2017	Grand Total
SoCalGas	151	191	153	168	164	151	978
SDG&E	67	55	55	37	43	38	295
Grand Total	218	246	208	205	207	189	1,273

Corrective Action totals in Table D5 include those related to OSHA-recordable injuries and illnesses and controllable motor vehicle incidents. These are the same numbers included in Table B5.

Table D5. Total Corrective Actions Related to OSHA-recordables and CMVIs

Company	2012	2013	2014	2015	2016	2017	Grand Total
SoCalGas	711	880	857	824	780	620	4,672
SDG&E	198	177	153	116	126	105	875
Grand Total	909	1,057	1,010	940	906	725	5,547

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Question 1.e. All indicators of public, employee, and contractor safety metrics used by SEMPRRA, and the Utilities to track and assess the safety performance of the utilities.

If a particular metric was not used or tracked in a certain year, please indicate so. Also, provide a description of the metric, its calculation methodology, how the data is collected, the frequency of reporting, and how the metric is used and when.

SDG&E and SoCalGas Response 1e:

SoCalGas/SDG&E object to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. SoCalGas/SDG&E object to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the burden, expense and intrusiveness of this request clearly outweigh the likelihood that the information sought will lead to the discovery of admissible evidence. Subject to and without waiving these objections, SoCalGas/SDG&E respond as follows:

The safety metrics primarily used by the utilities are defined in response to Question 1d and captured in Tables B1-B5, C.1, and D1 – D5. While other metrics could be used locally, for purposes of this response, SoCalGas and SDG&E are providing enterprise level metrics that are reported in the SIMS. The safety performance data is shared with senior management via multiple methods; verbally communicated and shared in meetings, daily incident reports, weekly safety performance statistics, and monthly summary. In addition to those items identified in Responses 1a - 1d above, the utilities also track contractor OSHA-recordable injuries. To date, this tracking has been informal and limited to a subset of the contractors who work for SDG&E and SoCalGas. In 2018, SoCalGas and SDG&E began using ISNetworld, the online platform provided by a third-party (ISN[®]), to formally track contractor incidents and injuries to ensure consistency and data integrity.