

POWER GENERATION VPP WORK GROUP

Q2, 2026

May 21, 2026

**Please check in on the chat function with
your name, title and company. Feel free to
add email**



Safety Moment

Presented By:

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Onward Energy

Valencia Power, LLC



OnwardEnergy
Where renewable meets reliable.





Safety Minute

“Environmental hazards”

STRICTLY PRIVATE | CONFIDENTIAL



OnwardEnergy

Safety Minute

“Environmental hazards”

Environmental hazards in the workplace can pose significant risks to health and safety if not properly managed. Among these, carbon monoxide (CO) is a particularly dangerous threat. The incomplete combustion of fuels produces this colorless, odorless gas and can lead to symptoms like headaches, dizziness, and even death in high concentrations. Remind employees how to prevent CO exposure by ensuring proper ventilation, maintaining equipment, and installing carbon monoxide detectors where the gas may accumulate.

A decorative graphic at the top of the page consisting of several overlapping, curved, wavy shapes in various shades of blue, creating a modern, fluid background element.

Safety Minute

“Environmental hazards”

Poor Air Quality: Dust, fumes, and chemical vapors can cause respiratory and long-term health problems. Review the importance of proper ventilation systems, personal protective equipment (PPE), and regular air quality monitoring in safety moments.

Extreme Temperatures: Working in excessively hot or cold environments can lead to heat stress, hypothermia, or frostbite. Ensure that employees know the guidelines regarding adequate breaks, hydration, and protective clothing to manage these conditions.

Noise Pollution: Prolonged exposure to high noise levels can result in hearing loss. Discuss noise-dampening equipment, ear protection, and limiting time spent in noisy areas.

Biological Hazards: Mold, bacteria, and other biological contaminants can cause illnesses. Support employees in maintaining clean workspaces, addressing water leaks promptly, and ensuring proper waste disposal.

Radiation: In certain industries, exposure to ultraviolet (UV) light, X-rays, or other forms of radiation can be harmful. Prioritize shielding, exposure time limits, and appropriate PPE.

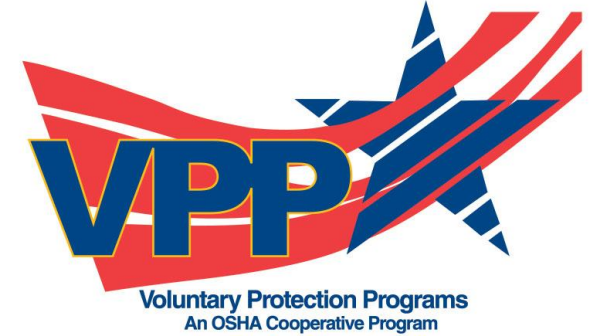
VPP Updates

Since last meeting:

New VPP Applications
Submitted or Accepted

Initial VPP Approvals

VPP Reapprovals



Special Government Employees (SGE)



Training and Opportunities

- 5 SGE training classes are scheduled through August of 2026. <https://www.osha.gov/sge/sge-training>
- SGE Opportunities – <https://www.osha.gov/sge/onsite>
- For more SGE Program Information - <https://www.osha.gov/sge>



VPP Element

- Management Leadership and Employee Involvement
- Worksite Analysis
- **Hazard Prevention and Control**
- Safety and Health Training





Incorporating Change Management Practices into Safety Procedure Management

Best Practice – Applying Kotter’s 8-Step Model into your procedure governance system

Malcom Hollins CSP, CSHO, CSSM

Agenda

Today we will discuss:

- Change Management vs. Management of Change (MOC).
- Why change management matters for safety procedures.
- Kotter's 8-Step Model for Leading Change.
- Applying each step to safety procedure management.
- Best practices and OSHA VPP connections.
- Key takeaways and Q&A.

Question: *“How many on the call are involved with safety or governance procedure management?”*

Change is Often Rejected Before It's Respected



- Change ideas may be considered disruptive or unrealistic.
- Steve Jobs showed that meaningful change succeeds when a clear vision is paired with persistence, simplicity, and a willingness to challenge outdated ways of thinking and working.

People often resist change when they cannot yet see its future value.

What Is Change Management and Management of Change?

Change Management

A structured approach to transitioning people and organizations

- Focuses on the human side of change: communication, buy-in, resistance, and adoption.
- Applies to safety procedures, SOP updates, attachment changes, and protocol rollouts.
- Many entities may overlook establishing change management practices across their units.

Goal: Ensure employees understand, accept, and consistently follow new or revised safety procedures.

Management Change

A formal process for evaluating and controlling modifications before implementation

- Required by OSHA PSM standard (29 CFR 1910.119(l)) for covered processes.
- Addresses changes to equipment, chemicals, technology, safety procedures, and facilities.
- Prevents new hazards from being introduced without adequate review.
- Requires documentation, impact assessment, approvals, training, and updated procedures.

Both disciplines are necessary. They're complementary, not competing.

Why Change Management Matters for Safety

Updating and implementing safety procedures requires changing how people think and work.

- New or modified governance document procedure implementation may fail when employees don't understand the “why” behind the change.
- Resistance to change is the number one barrier to successful safety procedure adoption.
- Poorly managed procedure rollouts lead to non-adoption, workarounds, shortcuts, and incident spikes due to misunderstandings (error traps).
- A structured approach bridges the gap between writing a procedure and people actually following it.



The Cost of Poorly Managed Change

Real-world consequences of poorly managed procedure changes and implementation.



- **BP Texas City (2005):** 15 killed, 180 injured. Unreviewed procedure changes (change management) and absent MOC controls were direct causes.
- **Piper Alpha (1988):** 167 fatalities. Failure to communicate a temporary change between shifts led to catastrophic failure.
- **Common failure patterns:** Rushing implementation, skipping hazard reviews, inadequate training, and poor communication.

Let's Be Real: Have you ever seen a safety procedure rolled out with an implementation date posted on the document, but it was only communicated once, during the document release?

Kotter's 8-Step Model for Change Management Leading Change with Safety Procedures

Developed by Harvard professor
Dr. John P. Kotter (1996).

- **Step 1:** Create a Sense of Urgency.
- **Step 2:** Build a Guiding Coalition.
- **Step 3:** Form a Strategic Vision.
- **Step 4:** Communicate the Vision.
- **Step 5:** Enable Action by Removing Barriers.
- **Step 6:** Generate Short-Term Wins.
- **Step 7:** Sustain Acceleration.
- **Step 8:** Institute Change.



01 Create Establish a feeling of urgency of hurriedness towards change.	02 Build Formulate a guiding coalition
03 Form Develop a strategy to bring about change.	04 Enlist Communicate or put forth the vision or strategy for change
05 Enable Empower employees for taking action to incorporate changes	06 Generate Formulate and generate short-term goals
07 Sustain Capitalize of wins or gains in order to produce bigger results	08 Institute Incorporate new and better changes in workplace culture

Step 1: Create a Sense of Urgency

Build urgency around why an error-prone or deficient safety procedure must be updated or replaced.

Element of Focus: Present incident data, near-miss trends, audit findings, and case studies showing consequences of outdated or inadequate safety procedures or non-conformities of procedure use and adherence.

- Use leading indicators to show where current procedures are failing before incidents occur.
- Share real incident examples of how outdated or error-trap procedures contributed to injuries or near-misses.
- Avoid complacency. Even when incident rates are low, outdated or error-trap procedures or casual compliance remain a hidden risk.



Step 2: Build a Guiding Coalition

Assemble a team to champion the new or revised safety procedure across the organization.

Focus: Build a cross-functional team including safety, subject matter experts, operations, maintenance, supervisors, and frontline employees who will use the procedure daily.

- Active and visible executive sponsorship is the #1 predictor of change success.
- Include employees who are respected on the floor and whose buy-in will influence peers.
- Ensure the coalition has decision-making authority, not just advisory status.

Key Question: “Who are the people others will follow when adopting change?”



Confined Space Procedure Project		
Drafting Team Members	COE/Site/Department	Role
1. Chad Donner	1. Coletto Creek	Plant Manager
2. Zak McCarty	2. Miami Fort	Maint Rep
3. Justin Spiller	3. Oak Grove	OPS Rep
4. Matt Daugherty	4. Oak Grove	Ops - Contractor Coordinator
5. Carl Britton	5. Midlothian / Ennis	Job Planning (Permit Filler)
6. Jason Shaw	6. Corporate EHS	Safety
7. Lisa Wisser	7. Corporate EHS	Cal Safety SME
8. Ron George	8. Fayette	Plant Manager
9. Stephen Wait	9. Kincaid	Plant Manager
10. Ben Albright	10. Engineering	Outage Rep
11. Keith Tatum	11. Mining	Mining SME
12. Steve Willis	12. Nuclear	Nuclear Safety SME
13. Tony Jumper	13. Mining	Maint Rep
14. John Kovacic	14. Nuclear	Nuclear Safety SME
15. Ryan Morten	15. Nuclear	Nuclear Craft Rep
16. Malcom Hollins	16. Corporate EHS/COE	Project Mgr / Procedure Writer

Step 3: Form a Strategic Vision

Define a clear picture of what successful procedure adoption looks like.

Focus: Define a vision where the procedure becomes second nature, followed consistently because workers understand its value, not just because it's required.

- Link the vision to measurable goals: procedure compliance rates, reduced deviations, improved audit scores, and fewer related incidents.
- The vision should be simple enough for every worker to explain why the new procedure matters.
- Move from “we have to follow this procedure” to “we understand why this procedure protects us.”

Question for Consideration: *“What does full adoption of this procedure look like on every level?”*

Step 4: Communicate the Vision

Communicate the new or revised procedure through every available channel, repeatedly.

Focus: Embed procedure training in toolbox talks, pre-shift meetings, signage, job aids, and leadership walk-arounds.

- Use simple, repetitive messaging. People need to hear a message 5–7 times before it registers.
- Create two-way communication. Workers should be able to flag procedure issues and suggest improvements, and leadership must take action.

Key Question: *“Can the procedure users explain the new procedure and why it changed?”*



It is acceptable to over communicate!

Step 5: Enable Action by Removing Barriers

Clear the obstacles that prevent people from following the new procedure.

Focus: Ensure the required tools to implement the procedures are established and available. Eliminate barriers “production pressure” that impacts procedure implementation and compliance.

- Invest in effective training tools so workers can be educated to perform the new procedure confidently and correctly.
- Reinforce Stop Work Authority so workers can pause when procedures aren’t being followed.
- Address “that’s how we’ve always done it” mindsets through coaching, demonstrations, and peer influence.

Key Question: *“What is stopping our people from following the new procedure? The answer may be due to the system.”*

Step 6: Generate Short-Term Wins

Recognize and celebrate early successes to build momentum and credibility.

Focus: Track procedure compliance rates, reduced deviations, fewer related incidents, improved audit scores, etc., in pilot areas.

- Publicly recognize teams and individuals who consistently rank high with procedure use scores.
- Connect early wins back to the vision. Show that the new procedure is working and producing safer outcomes.
- Short-term wins silence skeptics and energize the broader workforce to persist.

Consideration: *“Gauge your customer within 30–60 days of a procedure release and ask them if the new process makes your job easier, does the changes make sense, etc.”*



Step 7: Sustain Acceleration

Use growing credibility to expand procedure updates across the organization.

Focus: After initial wins, tackle larger challenges: rolling out the procedure to additional areas, updating related SOPs, and standardizing across shifts and sites.

- Don't declare victory too early. Full procedure adoption and habit formation take months, not weeks.
- Continue investing in refresher training, updated job aids, and coaching for procedure champions.
- Use compliance data and leading indicators to identify where the procedure still isn't being followed.

Key Question: *"Where is the procedure still not being followed consistently, and why?"*

Remember, don't just rely on the implementation dates posted and the one-time communication as victory.

Step 8: Institute Change

Anchor the new procedure into organizational systems so it outlasts any individual.

Procedure Focus: Embed the procedures into onboarding, competency assessments, performance reviews, and qualification requirements.

- Update management systems, SOPs, and training programs to reflect the updated procedures as the standard.
- Articulate the connection between following the procedure and improved safety outcomes (human organizational performance).
- Ensure leadership transitions don't erode adherence to the updated procedures.

Key Question: *“Where are opportunities to link access across various systems to ensure maximum adherence?”*

Best Practices for Safety Change Management

Integrating Kotter's framework with best practices for safety procedure rollouts.

- Involve frontline workers early. People support what they help create.
- Always explain the “why” behind every procedure change using real incident data and personal stories.
- Pilot new procedures in a controlled area or single shift before organization-wide rollout.
- Provide hands-on training, not just classroom instruction. Practice builds confidence.
- Communicate frequently and transparently. Silence breeds rumors and resistance.
- Use positive reinforcement. Recognize procedure compliance, not just punish deviations.
- Monitor and support post-implementation. The hardest part is making the new or revised procedure stick.

OSHA VPP and Change Management

VPP's four pillars naturally support structured safety procedure change.

- **Management Leadership & Employee Involvement:** Maps to Steps 1–4. Leadership drives urgency for procedure updates, builds coalitions, sets the vision, and communicates it.
- **Worksite Analysis:** Maps to Step 5. Identifying hazards reveals where procedures need updating and clears barriers to compliance.
- **Hazard Prevention & Control:** Maps to Steps 6–7. Implementing updated procedures generates wins; sustaining them drives acceleration.
- **Safety & Health Training:** Maps to Step 8. Ongoing training institutionalizes new procedures and makes them part of the culture.



Key Takeaways

What to remember from today's session.

- Change Management and Management of Change are complementary but distinct. Use both.
- Kotter's 8-Step Model provides a proven, sequential roadmap for the rollout of safety procedure.
- Urgency, coalition, and vision come first. Without them, execution efforts collapse.
- Engage frontline workers early and often. People support what they help create.
- Celebrate short-term wins, but don't declare victory too early.
- Anchor new procedures in systems, training, and culture.

“The rate of change is not going to slow down anytime soon.” — John P. Kotter.

OSHA Alliance Agreement

2026 Renewal

Best Practices



Ronald Cole, MPA, CSP, SHRM-SCP

Manager – Safety

Onward Energy



Safety Culture Excellence at Onward Energy

Introduction to Safety Culture



What is Safety Culture?

Core Definition of Safety Culture

Safety culture embodies shared beliefs and behaviors that prioritize risk management and safety in daily operations.

Impact in High-Risk Environments

In Utilities, safety culture determines responses to equipment failures and balances production with hazard controls.

Instinctive Safe Behaviors

Strong safety culture makes safe behavior instinctive, ensuring responsibility even with minimal supervision.

Safety as Integrated Performance

Safety culture integrates into performance, enhancing reliability, productivity, and workforce well-being beyond mere compliance.

Why Safety Culture Matters

Hazardous Work Environment

Utilities involves high risks like extreme temperatures, high-pressure systems, heavy machinery, interactions with wildlife, and exposures to high energy processes that require strict safety management.

Safety and Reliability Integration

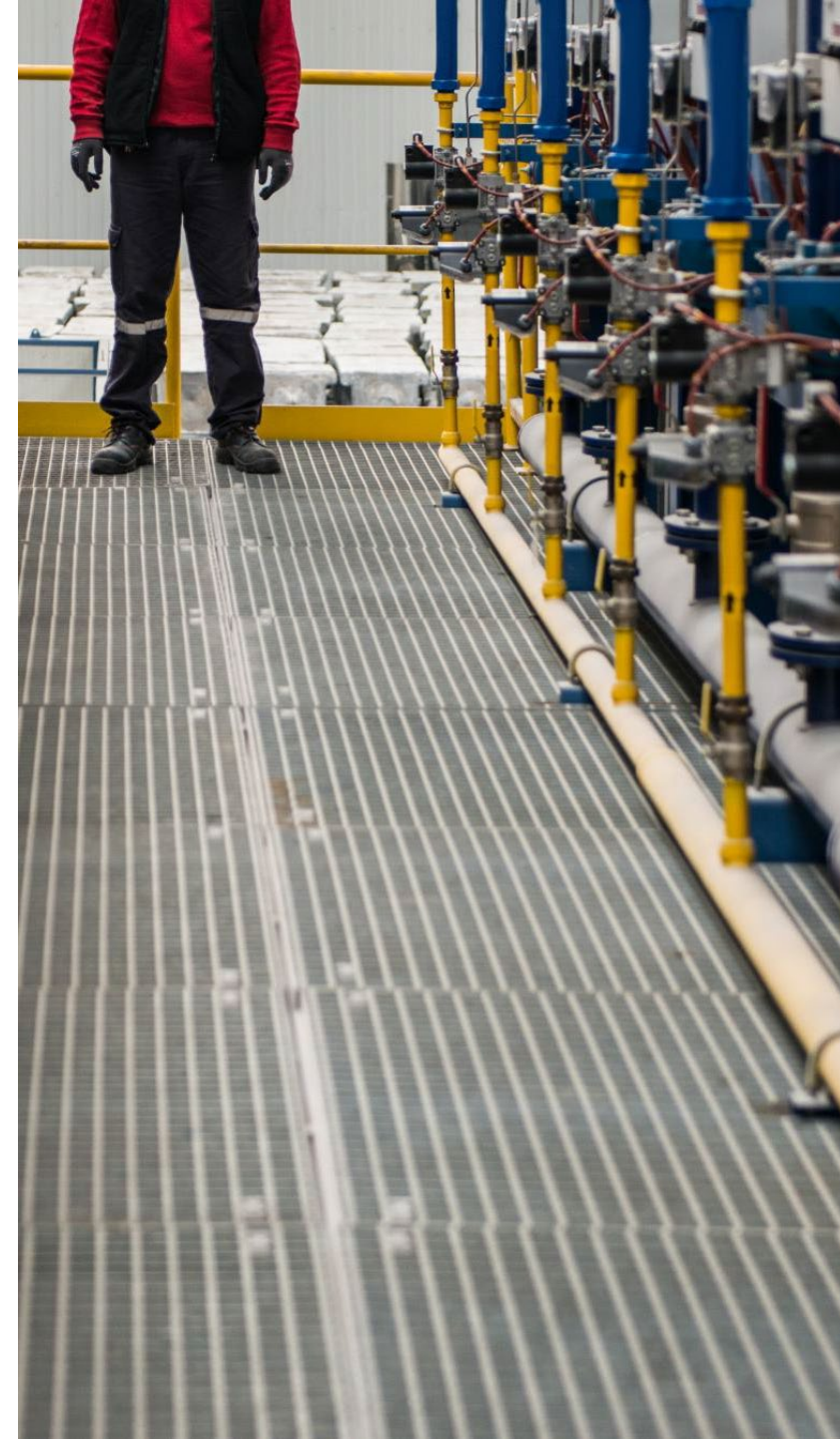
A strong safety culture aligns safety with continuous power supply, ensuring these priorities support each other rather than conflict.

Employee Engagement and Morale

Embedding safety in daily practices boosts employee morale and encourages open communication about risks and prevention.

Proactive Risk Prevention

Fostering safety culture shifts focus from reacting to incidents to preventing risks, improving performance and sustainability.



Core Principles of Safety Culture



Compliance vs Culture

Definition of Compliance

Compliance involves following established rules and regulations, often monitored through audits and inspections.

Limitations of Compliance

Compliance is reactive and limited; employees may only follow rules when supervised or observed.

Characteristics of Safety Culture

A strong safety culture makes safety an intrinsic value, leading employees to act safely even without oversight.

Benefits of Safety Culture

Safety culture fosters accountability, trust, and proactive hazard identification, preventing incidents sustainably.

Core Elements of Safety Culture

Leadership Commitment

Management actively prioritizes safety to guide the organization towards a safer work environment.

Workforce Ownership

Employees are empowered to take responsibility and actively participate in maintaining safety standards.

Hazard Awareness

Identifying and understanding risks is essential for preventing accidents and ensuring safety.

Open Communication

Free flow of safety information allows concerns to be raised without fear of reprisal.



Leadership and Workforce Engagement



Leadership Drives Culture

Leadership Sets Safety Standards

Leaders establish acceptable behaviors and standards guiding safety decision-making in organizations.

Visible Commitment to Safety

Effective leaders show commitment by participating in safety initiatives and engaging employees.

Accountability and Resource Support

Leaders hold themselves accountable and provide resources to maintain and improve safety standards.

Fostering Trust and Transparency

Leaders encourage open dialogue and empower employees to raise safety concerns without fear.



Leadership Drives Culture

SLT

Clearly communicate current standings and needs to SLT for support and messaging. Frame conversations around Costs, ROI, and Production and Morale improvement

Directors

Listen to directors on needs, weaknesses and strengths. Partner with directors to develop plans and process.

Managers and Supervisors

Listen to managers and supervisors on needs, weaknesses and strengths. Provide daily support on operational challenges. Follow through with promises. Be intentional

SELL THE VISION, DO NOT FORCE IT!



Workforce Ownership and Engagement

Active Employee Participation

Safety requires workers' active engagement in identifying hazards and following safe practices.

Empowerment to Stop Work

Employees must feel safe to stop work if conditions are unsafe, ensuring zero retaliation.

Proactive Communication and Reporting

Encouraging near-miss reporting and safety observations fosters accountability and trust.

Shared Responsibility Culture

Involving workers in decisions builds a culture where safety is a collective effort.

Starts Day 1

**STAY
ALERT**
DON'T GET HURT



New Employees

Safety Orientation

3-Week Check-in

6-Month Check-in

1-year Check-in

Committees and Meetings



Committees and Meeting

Redesign Meeting Structure

Start with Safety Moment

Participate in every meeting

Provide meeting support

Incident Reporting and Safety Management

Platform

New Safety Reporting Platform- KPA

- Mobility
- Ease of Use
- Increase reporting

Lone Worker Platform- Becklar

SLT and Director communication to board and workforce

- More is good

Improved Dashboard

Incident Communication Standard

Investigate all Incidents and Near Misses



Safety Metrics

Safety Metrics



Shift from lagging to leading reporting

- TRIR- YTD
- # of Safety Meetings
- Near Misses
- Positive Safety Actions and Observations
- Length of Incident Closure
- Number of Corrective Actions completed
- Safety Suggestions
- Leadership Walks and Talks
- Emergency Drills

Site Visits

Site Visits



Site Visit Plan

- Opening Meeting
- Site Inspection
- Job Work-Along
- Emergency Response Quiz
- Field Testing
- In-Person Training
- Closing Meeting
- 2-Days
- Increase Visit Frequency

Communication

Seek Safety
Aim Safety
Follow Safety
Ensure Safety
Teach Safety
Yield Safety



Communication

- SharePoint Site
- All about topics
- Pod Casts and How-Tos
- Centralized Resources
- Regular announcements
- Safety Townhalls
- Weekly Safety Topics

Celebrate the Wins

Awards

Quick Ad-a-boys

SLT acknowledgement

Company Praises

Site Rewards



Qualifications and Authorizations

Qualifications

Partner with Ops to build programs

- Solar Tech and Qualification Programs
- QEW

Training Gaps

Build Qualification and Authorized Person programs

Strong Programs builds confidence which builds morale and production



Questions?

Open Discussion

Questions?

Suggestions?

Discussion points?



2026 VPPPA Conference Schedule

- ~~Region 1 – May 20-21, Portland, ME~~
- Region 2 – September 24th , Atlantic City, NJ
- ~~Region 3 – April 26 – May 1, Williamsburg, VA~~
- Region 4 – June 2-4 , Mobile, AL
- ~~Region 5 – May 4-7, Lake Geneva, WI~~
- ~~Region 6 – May 18-21, Little Rock, AR~~
- Region 7 – No Information
- ~~Region 8 – May 12-14, Denver, CO~~
- ~~Region 9 – April 14-16, Reno, NV~~
- ~~Region 10 – May 19-21, Boise, ID~~
- VPPPA Safety+ - Aug. 30 – Sept. 2 , Nashville, TN



2026 Meeting Schedule

~~February 12th~~

~~May 21st~~

August 13th

November 12th

Meetings are scheduled from 1430 – 1600ET
(1230 – 1400MT)

