



**Memorandum from the Office of the Inspector General**

August 4, 2021

Chuck D. Spearman  
Dana J. White

**REQUEST FOR MANAGEMENT DECISION – EVALUATION 2021-15800 –  
ORGANIZATIONAL EFFECTIVENESS – GENERATION SERVICES, FIELD SERVICES**

Attached is the subject final report for your review and management decision. You are responsible for determining the necessary actions to take in response to our findings. Please advise us of your management decision within 60 days from the date of this report. In accordance with the Inspector General Act of 1978, as amended, the Office of the Inspector General is required to report to Congress semiannually regarding evaluations that remain unresolved after 6 months from the date of report issuance.

If you have any questions or wish to discuss our findings, please contact Amy R. Rush, Evaluations Manager, at (865) 633-7361 or Lisa H. Hammer, Director, Evaluations – Organizational Effectiveness, at (865) 633-7342. We appreciate the courtesy and cooperation received from your staff during the evaluation.

David P. Wheeler  
Assistant Inspector General  
(Audits and Evaluations)

ARR:KDS

Attachment

cc (Attachment):

TVA Board of Directors  
Susan E. Collins  
Buddy Eller  
Megan T. Flynn  
David Fountain  
Amanda D. Johns  
T. Daniel Lunsford  
Jeffrey J. Lyash

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Kay W. Whittenburg  
Robert B. Williams  
Jacinda B. Woodward  
OIG File No. 2021-15800



Office of the Inspector General

# *Evaluation Report*

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To the Director, Regional  
Engineering, and to the General  
Manager, Field Services

## **ORGANIZATIONAL EFFECTIVENESS – GENERATION SERVICES, FIELD SERVICES**

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Auditor  
Amy R. Rush

Evaluation 2021-15800  
August 4, 2021

## **ABBREVIATIONS**

FY	Fiscal Year
PO	Power Operations
SDM	Service Delivery Model
SHRM	Society for Human Resource Management
SPP	Standard Programs and Processes
TVA	Tennessee Valley Authority

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# Evaluation 2021-15800 – Organizational Effectiveness – Generation Services, Field Services

## EXECUTIVE SUMMARY

### Why the OIG Did This Evaluation

Organizational effectiveness, as defined in this evaluation, is the ability of an organization to achieve its mission and goals. Due to the importance of alignment between strategy, team engagement, and operational performance, the Office of the Inspector General is conducting organizational effectiveness evaluations of business units across the Tennessee Valley Authority. This evaluation focuses on Field Services, an organization within Power Operations’ Generation Services.

Field Services is tasked with delivering services that support plant outage execution, engineering, and programmatic needs on a planned and emergent basis. These efforts include governance for outage execution, critical field support, new unit integration, and coordination of contract support for program inspections. The objective of this evaluation was to identify factors that could impact Field Services’ organizational effectiveness. Specifically, we identified behavioral and operational factors that affect organizational effectiveness.

### What the OIG Found

During the course of our evaluation, we identified many positive behaviors for engagement; however, we also identified needed improvements in behaviors in relation to first-line supervisors in three departments. We also identified risks to business operations, including experience, resource needs, such as funding, and staffing, and concerns related to reorganization efforts involving engineering. In addition, business partners discussed concerns, including areas for improvement related to support and collaboration. Ratings are reflected in the table below:

	Low Risk	Medium Risk	High Risk
<b>Behaviors</b>		X	
<b>Operations</b>			X

### What the OIG Recommends

We recommend the Director, Regional Engineering, in conjunction with the General Manager, Field Services, (1) address management behaviors, resource needs, and business partner concerns and (2) evaluate gaps identified in this report with previous reorganizations and incorporate solutions into the current reorganization efforts involving engineering.



# Evaluation 2021-15800 – Organizational Effectiveness – Generation Services, Field Services

## EXECUTIVE SUMMARY

### TVA Management's Comments

TVA management agreed with the recommendations. See Appendix B for TVA management's complete response.

## **BACKGROUND**

Organizational effectiveness, as defined in this evaluation, is the ability of an organization to achieve its mission and goals. Due to the importance of alignment between strategy, team engagement, and operational performance, the Office of the Inspector General is conducting organizational effectiveness evaluations of business units across the Tennessee Valley Authority (TVA). This evaluation focuses on Field Services, an organization within Power Operations' (PO) Generation Services.

TVA created the Generation Services organization in fiscal year (FY) 2017 as a result of a Non-Fuel Operations and Maintenance initiative. Creation of this organization stemmed from a recommendation designed to address gaps in service delivery and redundancies within PO. The recommendation was to design a new service delivery model (SDM)<sup>1</sup> and consolidate core services to improve efficiencies and effectiveness within PO. The organization that was created contained four core functions, including asset reliability, fleet optimization, engineering and technical programs, and field services.

According to TVA's Annual 2020 Report, 55 percent of TVA's generation comes from PO generating assets. Field Services plays an integral role in supporting the equipment necessary for that generation. Field Services is tasked with delivering services that support plant outage execution, engineering, and programmatic needs on a planned and emergent basis. These efforts include governance for outage execution, critical field support, new unit integration, and coordination of contract support for program inspections. Field Services' responsibilities are accomplished through three departments responsible for engineering functions and one department responsible for outage functions.

- Field Support Services Balance of Plant is responsible for providing critical field support to PO for balance of plant equipment.<sup>2</sup> The department serves as the central point of contact for site engineering needs and is responsible for development of strategies and engineering performance based on PO's system performance, condition assessment, and root cause analysis. Certain members of this department serve as system experts in one or more areas of the maintenance or modification of plant equipment, components, and systems, including plant protective relays and transformer testing equipment. Technical service analysts within the department plan, conduct, and evaluate

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<sup>1</sup> The SDM involved the centralization of PO services to reduce gaps in performance related to service delivery. According to TVA documentation, impacts of the SDM were to include (1) increases in gas and hydro site engineering staff and decreases in coal site engineering and generation engineering staffs; (2) transference of coal site engineering, generation engineering, and gas and hydro regional engineering work to Generation Services (including Field Services); and (3) consolidation of the number of technical support positions/classifications across PO.

<sup>2</sup> According to Power Operations' Standard Programs and Processes (SPP) 09.000, *Conduct of Engineering*, balance of plant consists of the systems, components, and structures that comprise a complete power plant, excluding boilers, heat recover system generators, and select pollution control equipment.

engineering support tasks related to equipment performance testing, statistical data management, and predictive maintenance technologies.

- Field Services Turbine and Generators' functions include providing critical field support to PO for major equipment such as turbines, generators, and large electrical components, as well as providing strategies for outage and nonoutage operations. Functions also include development and oversight of long-term service agreements and programmatic support for PO. The department is comprised primarily of engineers who are responsible for technical work related to generators, exciters, and high-voltage equipment, and technicians who are responsible for conducting complex operations, tests, experiments, and analysis.
- Field Services Boilers and Environmental Systems is responsible for providing critical field support for major equipment such as boilers and heat recovery system generators, as well as development of strategies and engineered solutions based upon system performance, condition assessment, and root cause analysis. The department is primarily comprised of engineers tasked with serving as primary technical experts in boiler and heat recovery system generator equipment, systems, and processes.
- Outage Execution functions include the overall implementation of planned maintenance and forced outages on nonnuclear generating assets. The department is primarily comprised of regional outage managers, outage managers, schedulers, specialists, and outage support personnel. These individuals are responsible for managing the process and implementation of outage identification, planning, scheduling, execution, and assessment, as well as ensuring that fleet budgets are managed within limits while providing high levels of safety and quality. Additional outage-related functions include managing the focus of planned and maintenance outages of a specific duration for alignment with some of TVA's processes as well as governance of outage change requests. The department also contains individuals who are responsible for providing programmatic direction, governance, oversight, and support for plant operations, maintenance, and compliance with TVA policies and procedures, plant technical specifications, and federal, state, and local regulations.

Metrics for Field Services are shared with other PO organizations. Shared metrics include equivalent availability factors and equivalent outage factors for coal, combined cycle gas units, and hydro; economic startup and reliability factors for combustion turbines; unit trips; and outage readiness indicators. From October 1, 2019, through January 2021, Field Services was under budget in their operations and maintenance spending. From September 30, 2019, to March 15, 2021, staffing had increased from 105 to 112 employees, including interns. Staffing, as of March 15, 2021, included the General Manager, 26 individuals in Field Support Services Balance of Plant, 19 individuals in Field Services Turbine and Generators, 10 individuals in Field Services Boilers and Environmental Systems, and 56 individuals in Outage Execution.

Field Services' personnel, as of March 22, 2021, had been in their current departments and their current positions an average of approximately 2½ and 2 years, respectively.<sup>3</sup> According to Generation Services personnel, reorganization efforts within Generation Services are currently underway and expected to be completed by October 2021.

## **OBJECTIVE, SCOPE, AND METHODOLOGY**

The objective of this evaluation was to identify factors that could impact Field Services' organizational effectiveness. We assessed operations as of April 2021 and culture at the time of our interviews and fieldwork, which occurred between March 15, 2021, and April 26, 2021. To complete the evaluation, we:

- Reviewed (1) PO FY 2021 through FY 2023 business plan, (2) Generation Services FY 2020 through FY 2022 and FY 2021 through FY 2023 business plans, and (3) documentation provided by Field Services to gain an understanding of initiatives, metrics, and/or risks within Field Services.
- Reviewed TVA values and competencies (see the Appendix), for an understanding of cultural factors deemed important to TVA.
- Reviewed select PO SPPs and other documentation to gain an understanding of processes.
- Examined FY 2020 through January 2021 financial information to gain an understanding of expenditures used in support of the work environment.
- Conducted individual interviews with 104<sup>4</sup> individuals, including management, and analyzed the results to identify themes that could affect organizational effectiveness.
- Surveyed and/or interviewed a nonstatistical sample of 94 individuals from other TVA organizations that work together with Field Services' personnel and analyzed results to identify factors affecting organizational effectiveness from a business partner perspective.

This evaluation was performed in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

## **OBSERVATIONS**

During the course of our evaluation, we identified many behaviors that had a positive impact on Field Services; however, we identified behavioral risk in

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<sup>3</sup> Changes in the organizational headcount occurred between February 11, 2021, and March 22, 2021, which increased the number of individuals in the organization.

<sup>4</sup> As of March 15, 2021, the date our interviews began, Field Services had 112 employees, including interns. We did not interview six employees because five preferred not to be interviewed and one was not available. We also did not interview two interns.

relation to first-line supervisors in three departments. We also identified risks to business operations, including resource impediments such as experience, funding, and staffing, and concerns related to reorganization efforts involving engineering. In addition, business partners discussed concerns, including areas for improvement, such as support and collaboration.

## **BEHAVIORAL FACTORS**

According to the Society for Human Resource Management (SHRM),<sup>5</sup> employee engagement relates to the level of an employee's connection and commitment to the organization. In addition, SHRM specifies drivers of employee engagement, including commitment of leaders, trust in leadership, and positive relationships with supervisors. TVA, in its Business Operating Model, states that engagement is one component of effective execution. TVA has also developed competencies intended to define common characteristics that set the tone for how work is to be performed in the organization. Defined behaviors are associated with the competencies to provide guidance as to how employees can demonstrate their commitment to TVA. While interviews revealed that team interactions were positive drivers of engagement and interactions with most management were positive, we determined, based on concerns with first-line management interactions in three departments, that behavior risk was medium.

### **Team Interactions are Positive Drivers of Engagement**

Most individuals commented positively on interactions within their groups and most trusted their coworkers to perform their jobs well. Specific examples provided by those commenting positively indicated that communication, collaboration, teamwork, and/or support existed within the group. Additionally, when asked what worked well within their organization, several individuals indicated that their group works well together, has good communication, or commented positively on the skillset, experience, or coordination within the group. Most individuals within Field Services also commented positively on morale, with several individuals attributing the positive morale to teamwork, interactions with team members, or support from their team members.

### **Concerns with Management Interactions**

TVA expects leaders to inspire trust and engagement by building a positive environment that motivates others to achieve and exceed organizational goals and team aspirations. We asked individuals within Field Services about relationships with their first-line management, middle management, and upper management.

Most individuals commented positively when asked about interactions and communication with their first-line management. However, several employees expressed concerns with recognition and/or accountability in relation to two managers in one department. Additional concerns regarding trust were expressed by some in relation to a manager in another department. Concerns

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<sup>5</sup> SHRM is a membership organization for Human Resource professionals.

pertaining to relationship, communication, trust, accountability, and/or recognition were expressed by some in relation to three managers in a third department. We discussed the specifics of these issues with the General Manager of Field Services.

While many individuals commented positively on their interactions with middle management, several did not comment because (1) their middle manager was new, (2) they indicated they follow their chain of command, or (3) interactions with middle management did not occur or were minimal. Additionally, many individuals did not provide comments pertaining to their interactions with upper management. Of those who did provide comments on middle and upper management, many individuals commented positively on communication, trust, reporting concerns and/or offering a differing opinion to management, accountability, and recognition.

As stated previously, most individuals within Field Services commented positively on morale as being positive, with some individuals specifically commenting on management and/or management's actions being a driver of the positive morale. Examples included management being supportive and positive interactions with management during meetings.

## **RISKS TO OPERATIONS**

Based on our interviews, we identified risks to operations that could impede Field Services' effectiveness if unaddressed. While most individuals indicated they had no issues in completing their job responsibilities, several individuals discussed a lack of experience and funding or staffing concerns, along with vehicle and other resource needs that could affect performance of their job responsibilities. Field Services' personnel also discussed concerns related to reorganization efforts involving engineering. Further, while business partners rated Field Services above average in products and services, quality of feedback, communication, and timeliness, many business partners discussed concerns, including needed improvements within the organization, such as support and collaboration.

### **Risks to Performance of Job Responsibilities**

As stated previously, Field Services is responsible for providing services to PO's generating assets, which are located across the Tennessee Valley. Specifically, Field Services' engineering departments are responsible for supplying critical field support for various types of generating equipment and providing input for outages. In addition, the Field Services' Outage Execution department is responsible for the overall implementation of planned maintenance and forced outages on nonnuclear generating assets. Field Services' personnel discussed resource impediments that affected performance of these job responsibilities, such as a lack of experience and staffing and concerns related to reorganization efforts occurring in the organization, which could affect job performance.

### Resource Impediments Affecting Performance of Job Responsibilities

While most individuals indicated they had no issues in completing their primary job responsibilities, some individuals in three Field Services' departments indicated they had a lack of experience or were learning on the job, with a few indicating the need for technical training or training specific to their job responsibilities. When Field Services was created through implementation of the SDM, engineers were allowed to express interest in positions and selections were made based on seniority and not experience, with some exceptions. In addition, as stated previously, Field Services' personnel, as of March 22, 2021, had been in their current departments and positions an average of approximately 2½ and 2 years, respectively. Job selection based on seniority rather than experience, as well as the length of time in position, could have prompted the comments pertaining to experience issues and training needs.

Some individuals across all Field Services' departments noted funding or staffing needs in their departments, which several believed affected their ability, in some instances, to provide services to their business partners. In addition, a few individuals in two Field Services' departments indicated scheduling issues due to resource constraints, conflicts with their business partners, or emergent issues, which could affect completion of job responsibilities or timeliness of service. Further, a few individuals in three Field Services' departments indicated needing an adequate vehicle for performance of their job responsibilities. According to a few individuals, the organization obtains vehicles through long-term rental agreements and a few employees indicated issues with renting vehicles. A few individuals in two Field Services' departments described other issues that could negatively affect performance of job responsibilities, including (1) inaccurate drawings in TVA's Enterprise Content Management,<sup>6</sup> (2) knowing whom to contact for information requests, or (3) obtaining timely information.

Departments within Field Services are dependent on each other, as the outage execution group needs engineering to provide input into outages or outage planning and the engineering group needs outage execution to assist with evaluating emergent work. When asked about interactions with other departments in their organization, many individuals indicated positive interactions with others; however, several indicated issues or concerns similar to those discussed above. Specifically, some individuals indicated a lack of staffing in other Field Services' departments or had concerns about skillsets or experience levels within other Field Services' departments. Inadequate staffing and/or experience levels can negatively affect the level of support that engineering and outage departments provide to their external business partners and to each other.

### Concerns Stemming from Reorganizational Efforts and Management Changes

As stated previously, reorganization efforts within Generation Services are currently underway, with implementation of the reorganization expected to occur October 2021. According to a manager within Generation Services who is

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<sup>6</sup> Enterprise Content Management is a web-based system used for collaboration and knowledge management and to gather, store, share, distribute, and manage information.

responsible for the reorganization activities, the reorganization is to address issues or gaps in technical services in preparation for flexibility and asset changes<sup>7</sup> within PO.

Many individuals within Field Services expressed concerns related to reorganization efforts or management changes occurring within their own or other Field Services' departments. Specifically, several of the individuals expressed concerns that changes either are negatively impacting or will negatively impact (1) morale, (2) support to business partners or business partner relationships, (3) knowledge sharing and cross training, or (4) cohesion or working together for timely response. Another concern was expressed in relation to broadening of responsibilities outside of one's area of expertise. This could include being responsible for turbine engineering when the individual has no experience in that area. Some of these concerns could stem from the implementation of the SDM. For instance, a few individuals commented on the concerns, which included (1) individuals placed in positions based on seniority rather than experience levels and (2) ambiguity or overlap in roles and responsibilities. A few individuals across Field Services' departments also expressed the need for continuity or consistency within the organization or time to determine effectiveness of previous organizational changes.

A change management plan is slated to be completed in late July 2021. As of May 18, 2021, the reorganization team was revising PO-SPP-09.000, *Conduct of Engineering*, which includes defining roles and responsibilities. Not adequately addressing these concerns could negatively affect performance of job responsibilities and could result in loss of generation through a forced outage due to inadequate support.

### **Business Partner Concerns**

We interviewed a sample of Field Services' business partners to determine their opinions related to Field Services' products and services, quality of feedback and communication, and timeliness. Individuals provided feedback indicating that Field Services was above average in all areas. However, several business partners provided comments concerning improvement areas within Field Services that could affect relationships. In addition, comments were provided that were specifically related to engineering or outage functions within the organization.

### Improvements Needed in Field Services

In general, comments provided in relation to Field Services as a whole included the need for improvements in service or support, such as increased presence in the field; and more staffing, knowledge transfer, or experience within the organization. Business partners also provided comments related to the need for increased collaboration and communication, such as the opportunity for business partners to provide feedback; and consistency in ownership of areas, such as major equipment scopes. In addition, a few individuals noted that issues had

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<sup>7</sup> Flexibility and asset changes include changes to TVA's facilities, such as coal retirements and gas additions.

occurred with the SDM implementation, which included role clarity issues and indications of inadequate support.

#### Improvements Needed in Engineering Departments

While responsibilities for the engineering departments include providing critical field support, several business partners commented on the lack of support from Field Services' engineering groups. Examples included the need for support with mechanical areas, major equipment, preventive maintenance services, or non-North American Electric Reliability Corporation relay support. In addition, a few business partners indicated the support received was not timely or that engineers did not spend enough time in the field providing support.

Several business partners also mentioned staffing issues within Field Services' engineering departments with some noting the need for technical services analysts, civil engineers, electrical engineers, and/or relay support. A business partner stated that, because of insufficient staffing, testing to meet a regulatory requirement had to be scheduled during the regulatory grace period,<sup>8</sup> which is considered risky by the business partner. This caused the business partner to obtain support from another TVA organization. Several business partners also noted the need for more experience in the engineering departments. Specific areas included (1) disciplines, such as instrument and control engineering and electrical engineering; (2) commodities, such as gas and hydro; and (3) equipment, such as turbines and exciters.

#### Improvements Needed in Outage Execution

According to PO-SPP-07.002, *Power Operations Planned Outage Management*, detailed outage planning begins 18 months prior to the outage start date. During this planning phase, outage managers, including Field Services' outage managers, are expected to work with project managers and engineering personnel to issue a list of proposed modifications for implementation during the outage, which allows for review and approval of the outage scope. Additionally, PO-SPP-07.002 expresses the need for soliciting input from multiple sources, including engineering, operations, system planning, and business planning, when conducting long-range planning.<sup>9</sup>

Business partners provided specific comments in relation to the Outage Execution group. Several individuals indicated the need for more communication or collaboration from the group. Examples of issues or concerns included lack of collaboration with others pertaining to outage support, inadequate communication in relation to outage budgets, the need for more timely communication or status updates, and the lack of a feedback mechanism. Other examples included the need for communication so that the Outage Execution personnel could understand the needs of the business partner, the need for

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<sup>8</sup> Grace period is a period of time beyond a due date during which an obligation may be met without penalty.

<sup>9</sup> According to PO-SPP-07.002, long-range outage planning includes the development of five- and ten-year outage plans containing rough budgetary costs, standard durations for generic worksopes, and designated fiscal year and season in which the outage will be performed.

refinement of the outage process or outage scope, timeliness of communication, and improvements in outage planning, such as long-range outage plans. Increased collaboration with business partners and other Field Services' departments could improve the refinement of the outage process, budgets, and/or scope.

We noted that a few business partners indicated the need for increased outage staffing or support, including outage coordination support or indicated the need for increased experience of outage personnel in the gas area. We also noted a couple of the individuals within the Outage Execution department indicated they supported organizations not only within their assigned region, but also outside of their assigned region. Additionally, a few business partners also indicated that clarity of purpose, roles, and/or responsibilities in relation to outages needed to be defined by Field Services.

## **CONCLUSION**

As described previously, TVA's Annual 2020 Report states that 55 percent of TVA's generation comes from PO generating assets. Field Services plays an integral role in supporting the equipment necessary for that generation, which could become even more important in the future as TVA changes its generation mix. Addressing risks and concerns identified by Field Services' personnel and their business partners can better situate TVA for efficiently meeting current and future generation needs.

Field Services' personnel indicated positive relationships with each other and with most of Field Services' leadership, which indicates the employees' connection and commitment to the organization. However, behavioral issues were identified for several managers in three departments. In addition, both Field Services' personnel and their business partners expressed concerns in relation to business operations. Addressing concerns related to management interaction, staffing, experience, and other resource needs could position the organization to meet its current and future responsibilities more effectively and efficiently. Furthermore, addressing concerns stemming from both past and current reorganization efforts could relieve angst and better prepare individuals, both within and outside Field Services, for the transition.

## **RECOMMENDATIONS**

We recommend the Director, Regional Engineering, in conjunction with the General Manager, Field Services:

1. Address management behaviors as described in this report.
2. Evaluate adequacy of staffing and experience within Field Services' engineering and outage departments and take action, as necessary.

3. Address additional resource issues, including vehicle and information needs.
4. Address concerns identified by the business partners, including those related to support, collaboration, and roles and responsibilities.
5. Implement a formal mechanism for obtaining feedback from all business partners.
6. Evaluate gaps identified in this report with previous reorganizations and incorporate solutions into the current reorganization efforts involving engineering.

**TVA Management's Comments** – TVA management agreed with the recommendations. See Appendix B for TVA management's complete response.

<b>TVA Values</b>	
Safety	We are committed to the safety and well-being of each TVA employee and the communities we serve.
Service	We are proud to serve in the communities in which we live, work, and play.
Integrity	We are honest and straightforward.
Inclusion	We strive to treat everyone with dignity and respect by welcoming each person's individuality so we can all reach our full potential.

### **TVA Leadership Competencies**

Accountability and Driving for Results  
Continuous Improvement  
Leveraging Diversity  
Adaptability  
Effective Communication  
Leadership Courage  
Vision, Innovation, and Strategic Execution  
Business Acumen  
Building Organizational Talent  
Inspiring Trust and Engagement

July 30, 2021

David P. Wheeler, WT 2C-K

REQUEST FOR COMMENTS – DRAFT EVALUATION 2021-15800 – ORGANIZATIONAL  
EFFECTIVENESS – GENERATION SERVICES, FIELD SERVICES

This is in response to your memorandum dated July 14, 2021. After review of the draft audit, please see the following response for Field Services Organizational Effectiveness.

We would like to thank Amy Rush for her diligence and support to optimize the Organizational Effectiveness evaluation and provide us with recommendation for improvement.

**Recommendations**

We recommend the Director, Regional Engineering, in conjunction with the General Manager, Field Services:

1. Address management behaviors as described in this report.

Response

Generation Services agrees with this recommendation.

2. Evaluate adequacy of staffing and experience within Field Services' engineering and outage departments and take action, as necessary.

Response

Generation Services agrees with this recommendation.

3. Address additional resource issues, including vehicle and information needs.

Response

Generation Services agrees with this recommendation.

4. Address concerns identified by the business partners, including those related to support, collaboration, and roles and responsibilities.

Response

Generation Services agrees with this recommendation.

5. Implement a formal mechanism for obtaining feedback from all business partners.

Response

Generation Services agrees with this recommendation.

Wheeler  
Page 2  
July 30, 2021

- Evaluate gaps identified in this report with previous reorganizations and incorporate solutions into the current reorganization efforts involving engineering.

Response

Generation Services agrees with this recommendation.

Thank you for allowing us to provide these comments. Please contact us if you have any questions.



Dana White  
General Manager, Field Services  
Power Operations, Generation Services  
LP 2L - C



Chuck Spearman  
Director, Regional Engineering  
Power Operations, Generation Services  
LP 2L - C

MTB

cc:

Sue Collins, LP 3D-C  
Megan Flynn, LP 3A-C  
David Fountain, WT 6A-K  
Amanda Johns, LP 3A-C  
Thomas Lunsford, BCT 1A-BVT  
Don Moul, WT 7B-K  
Ronald Sanders, MR 5E-C  
Mike Skaggs, WT 7B-K  
Wilson Taylor, WT 7D-K  
Robert Williams, LP 2L - C  
Jacinda Woodward, LP 2K-C