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July 31, 2026

Docket: SCA-Guidelines

Forest Kaser, Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Joint Comments of Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company on Proposed Enhancements to the Safety Culture Assessment Guidelines

Dear Director Kaser:

The Joint Utilities (collectively, Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company) appreciate the Office of Energy Infrastructure Safety's (Energy Safety) commitment to continuous improvement of the Safety Culture Assessment (SCA) process and the opportunity to provide feedback regarding enhancements to the assessment framework. The Joint Utilities support an approach that strengthens organizational learning, improves assessment quality, and promotes consistency across state oversight agencies while minimizing unnecessary administrative burden. The Joint Utilities submit these comments in response to Energy Safety's proposed enhancements to the Safety Culture Assessment Guidelines, as presented at the July 24, 2026, public workshop.

A. Increased Alignment and Coordination of CPUC and Energy Safety SCA Processes and Cadence

The Joint Utilities recommend that Energy Safety and the California Public Utilities Commission (CPUC) Safety Policy Division (SPD) coordinate assessment cadence and leverage the strengths of both assessment programs to meet their respective objectives while limiting duplication of efforts. Greater coordination can improve efficiency; reduce duplicative surveys, interviews, document requests, and workforce disruption; and allow assessment efforts to focus on generating meaningful insights that support safety culture maturity and long-term organizational improvement.

For example, one potential model would be to conduct the SPD Comprehensive Safety Culture Assessment and Energy Safety Wildfire Safety Culture Assessment as a coordinated Year 1 assessment cycle, followed by an Energy Safety assessment approximately two years after the Comprehensive Assessment. This would allow sufficient time for utilities to implement

corrective actions, evaluate effectiveness, and demonstrate measurable organizational learning and improvement before the next Energy Safety assessment cycle.

This approach would also support the coordination objectives identified in Decision (D.) 25-01-031 and the Memorandum of Understanding between Energy Safety and the CPUC required by statute.¹ Specifically, this approach would allow utilities to focus resources on implementing safety improvements rather than responding to overlapping assessment activities, while preserving each agency's distinct statutory responsibilities.

B. Enhance the Management Self-Assessment Maturity Model to Emphasize Organizational Learning and Continuous Improvement

Consistent with the themes discussed during the recent workshop, the Joint Utilities support an assessment framework and maturity model that focuses on organizational learning and continuous improvement rather than compliance. The assessment should evaluate whether management systems effectively identify risk, encourage reporting, drive corrective actions, and produce measurable and sustained improvement over time.

The Joint Utilities support continued use of a maturity-based framework for Management Self-Assessments; however, the model should be improved to recognize continuous improvement in utility maturity over time. As utility safety management systems mature, the assessment model should better differentiate higher levels of maturity and emphasize sustainability, adaptability, learning effectiveness, self-challenge, corrective action effectiveness, and the ability to identify emerging risks.

A revised maturity model should avoid the perception that reaching a maturity level means improvement is complete. Instead, it should encourage ongoing improvement, innovation, and sustained safety performance. This would provide greater value for utilities that have already established foundational safety culture processes and are focused on strengthening organizational learning and long-term performance outcomes.

C. Focus Assessments on Effectiveness Rather Than Compliance

The Joint Utilities recommend that future assessments focus on effectiveness and organizational learning rather than prescriptive compliance verification that programs or procedures exist. The assessment should evaluate whether utility management systems identify

¹ See, e.g., Public Utilities Code § 8386.5 (“The commission, the office, and the Department of Forestry and Fire Protection shall enter into a memorandum of understanding to cooperatively develop consistent approaches and share data related to fire prevention, safety, vegetation management, and energy distribution systems.”); Gov. Code § 15476 (“The Public Utilities Commission and the office shall enter into a memorandum of understanding to cooperatively develop consistent approaches and share data related to electric infrastructure safety. The commission and the office shall share results from various safety activities, including relevant inspections and regulatory development.”)

and reduce risk, encourage reporting, drive effective corrective actions, prevent repeat events, and demonstrate measurable improvement over time.

The Joint Utilities support a balanced assessment approach that considers workforce perceptions together with objective evidence. Workforce surveys and interviews provide valuable insights, but they should be considered alongside supporting documentation, performance information, governance activities, corrective action tracking, and direct observations.

This qualitative approach would better assess whether safety culture processes are producing meaningful changes in leadership behavior, workforce engagement, risk reduction, corrective action effectiveness, and operational performance. Evidence of learning, adaptation, and sustained improvement should be the primary focus, rather than compliance-oriented confirmation of program elements.

D. Use a Common Safety Culture Assessment Model Across Energy Safety and CPUC

The Joint Utilities recommend that Energy Safety use the same Safety Culture Assessment model as SPD, where practical, to improve consistency, transparency, and comparability across California safety culture oversight activities. A common model would reduce unnecessary complexity and help utilities, regulators, and stakeholders interpret assessment expectations and results more consistently.

While Energy Safety and SPD may retain distinct statutory responsibilities and assessment objectives, use of a common framework, terminology, maturity model, and evaluation approach would improve alignment between assessment programs. It would also allow utilities to focus resources on addressing safety culture insights and improving performance rather than reconciling different assessment models or duplicative methodologies.

CONCLUSION

The Joint Utilities recommend that the updated Safety Culture Assessment Guidelines address the above topics to improve coordination, reduce duplicative assessment burden, and strengthen the value of the SCA process as a driver of organizational learning and continuous improvement.

The Joint Utilities appreciate the opportunity to comment on the proposed enhancements to the Safety Culture Assessment Guidelines. Should Energy Safety have any questions or concerns, please do not hesitate to contact PG&E at wade.greenacre@pge.com, SDG&E at kkloberdanz@sdge.com, or SCE at aaron.renfro@sce.com.

Sincerely,

//s//

Rebecca Furman

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Southern California Edison