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VIA ELECTRONIC FILING **Docket #SCA-Guidelines**

Suzie Rose
Program Manager
Electrical Undergrounding and Culture Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: Joint Utilities' Comments on the Draft SCA Guidelines Version 2.0

Dear Program Manager Suzie Rose:

Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric (SDG&E), and Southern California Edison (SCE) (collectively, the Joint Utilities) respectfully submit these comments on the Office of Energy Infrastructure Safety's (Energy Safety) Draft Safety Culture Assessment Guidelines, Version 2.0 (Draft Guidelines), issued on October 2, 2026.

I. THE JOINT UTILITIES APPRECIATE ENERGY SAFETY'S EFFORTS TO EVOLVE ITS PROCESS

The Joint Utilities share a common objective in continually seeking to improve their respective safety cultures and appreciate Energy Safety's efforts to evolve its process. For instance, the Draft Guidelines improve the process by clarifying that the Management Self-Assessment applies to only the Small and Multijurisdictional Utilities (SMJUs). Moving the assessment process to a two-year cadence is a step in the right direction as meaningful culture change is difficult to measure and demonstrate on an annual basis.

II. THE JOINT UTILITIES RECOMMEND INCREASED COORDINATION AND ALIGNMENT BETWEEN ENERGY SAFETY AND CPUC SAFETY CULTURE ASSESSMENTS

The Joint Utilities support continued collaboration between the California Public Utilities Commission (CPUC) and Energy Safety to advance a common, evidence-based approach to assessing and improving utility safety culture. This is consistent with the Memorandum of Understanding between the agencies "to cooperatively develop consistent approaches" under

Government Code Section 15476.[1] While the Joint Utilities recognize Energy Safety's statutory responsibility to evaluate safety culture as it relates to wildfire risk, we are concerned that the Draft Guidelines further diverge from the CPUC-adopted safety culture assessment framework established pursuant to Public Utilities Code §8386.2(b), creating unnecessary duplication, inconsistent expectations, and the potential for confusing, competing and/or conflicting outcomes.

The Draft Guidelines establish a separate assessment model centered on High Reliability Organization (HRO) principles and a wildfire-focused scope, while expressly distinguishing the Energy Safety process from the CPUC process. This results in a distinct methodology, data collection approach, submission requirements, assessment elements, and recommendation process.

Safety culture is an enterprise-wide organizational attribute that influences all aspects of utility operations, including employee safety, public safety, reliability, operational excellence, and wildfire risk management. Assessing wildfire safety culture separately from the broader organizational safety culture framework, without sufficient coordination between the two processes, risks creating fragmented assessments and inconsistent signals regarding what constitutes a strong safety culture.

The Joint Utilities believe safety culture outcomes will be best achieved when both agencies leverage a common framework, common terminology, and, where possible, a coordinated assessment process. Such alignment would improve the consistency and comparability of assessment results, findings, recommendations, and performance measures, while strengthening the ability of regulators and utilities to evaluate cultural trends, organizational learning, risks, and long-term improvement.

A common approach would also provide employees with consistent expectations and measures of success, enabling findings, recommendations, and lessons learned to reinforce one another rather than potentially create differing priorities. As stated in the Memorandum of Understanding, "Government Code Section 1547 directs the CPUC and Energy Safety to cooperatively develop consistent approaches and share data" and "work together to develop consistent approaches and policies towards public safety."[2]

The Draft Guidelines also contemplate multiple assessment activities, including workforce surveys, interviews, focus groups, document reviews, objectives reporting, lessons learned reporting, and recommendation tracking. Greater coordination between the CPUC and Energy Safety could reduce duplicate requests for information and duplicate workforce engagement activities while preserving the ability of each agency to meet its statutory obligations.

Safety culture improvement occurs over many years. Maintaining alignment in constructs, measures, and assessment methodologies enables regulators and utilities to better track progress over time and evaluate whether interventions are producing meaningful cultural change.

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[1] Memorandum of Understanding between the California Public Utilities Commission and the Office of Energy Infrastructure Safety (signed July 12, 2021) 20210712-cpucoeis-mousigned.pdf

[2] Id. at p. 6.

The Draft Guidelines limit the assessment primarily to electrical operations personnel and contractors engaged in wildfire mitigation activities. However, safety culture is influenced by organizational systems, leadership behaviors, governance processes, communication practices, contractor management, learning systems, and workforce engagement across the entire enterprise. A coordinated framework would provide a more comprehensive understanding of the cultural factors that ultimately influence public safety, employee safety, reliability, and wildfire risk.

Consistent with the Memorandum of Understanding, the Joint Utilities therefore request that Energy Safety and the CPUC collaborate to:

- Develop a shared conceptual framework for assessing safety culture across California's regulated utilities.
- Harmonize survey instruments, terminology, and cultural dimensions, where feasible.
- Coordinate data collection efforts to minimize duplicate workforce impacts.
- Seek opportunities for mutual recognition of assessment results and supporting evidence.
- Align recommendations and improvement tracking processes to provide clear, consistent direction for utilities.
- Maintain flexibility for Energy Safety to evaluate wildfire-specific risks while grounding those evaluations within the broader CPUC-adopted safety culture framework.
- Establish a mechanism for utilities to identify information, surveys, assessments, or other materials previously provided through another safety culture assessment results and, where appropriate, rely on those materials rather than requiring duplicative submissions.
- Develop and maintain a crosswalk identifying relationships between Energy Safety and CPUC safety culture assessment frameworks, terminology, evidence sources, and reporting expectations.
- Develop a common recommendation management and reporting framework that may be used to support both Energy Safety and CPUC assessment programs.
- Establish a formal process for reviewing and reconciling assessment recommendations that overlap, duplicate, or provide differing implementation direction.

In the interim, the Joint Utilities respectfully request that the Draft Guidelines be modified to clarify that Energy Safety will address and seek to establish a process for identifying and reconciling any assessment recommendations that do not align with the CPUC assessment findings to prevent confusion and inefficiencies in the two processes.

III. CONCLUSION

The Joint Utilities strongly support robust safety culture assessments and continuous improvement. However, the objective of improving safety outcomes is best served through regulatory alignment rather than increasingly separate assessment models. A coordinated CPUC-

Energy Safety approach would promote consistency, enhance organizational learning, reduce unnecessary burden, and provide a more accurate understanding of the cultural conditions that influence both wildfire risk management and overall safety performance. The Joint Utilities therefore encourage Energy Safety to work collaboratively with the CPUC and stakeholders to better integrate the Draft Guidelines with the existing CPUC safety culture assessment framework and establish a unified approach that maximizes safety culture improvement across California's utilities.

Respectfully submitted,

/s/ Cameron Biscay

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