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Caroline Thomas Jacobs, Director  
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**Via Electronic Filing  
Docket: 2022-SCs**

**SUBJECT:** Reply Comments of Southern California Edison Company on the  
2022 Safety Certification Request

Dear Director Thomas Jacobs,

Pursuant to the August 25, 2022 Office of Energy Infrastructure Safety's (Energy Safety's) 2022 Safety Certification Guidelines (Guidelines), Southern California Edison Company (SCE) hereby submits this reply to comments on SCE's 2022 safety certification request.<sup>1</sup>

## **INTRODUCTION**

The Public Advocates Office (Cal Advocates) was the only stakeholder to submit comments on SCE's 2022 safety certification request. While Cal Advocates does not appear to recommend that SCE's request for safety certification be denied,<sup>2</sup> Cal Advocates makes several statements that suggest requirements be imposed in the safety certification process that would be inconsistent with the statutory requirements.

## **SCE HAS MET THE "GOOD STANDING" REQUIREMENT OF SECTION<sup>3</sup> 8389(E)(2) BY AGREEING TO IMPLEMENT THE FINDINGS OF ITS SAFETY CULTURE ASSESSMENT**

Cal Advocates states that "[t]he most recent safety culture assessments conducted by Energy Safety for the applicant utilities are one year old" and asserts that "[b]y referring

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<sup>1</sup> Cal Advocates comments on the annual Safety Certification requests of Bear Valley Electric Service, Inc. (BVES), Pacific Gas and Electric Company (PG&E), and SCE, but SCE focuses its reply on those comments that appear to address SCE's request.

<sup>2</sup> Rather, Cal Advocates appears to be focused on modifications to the safety certification process. Cal Advocates' conclusion states: "Cal Advocates respectfully requests that Energy Safety consider these comments and modify the safety certification process in accordance with the recommendations discussed herein." Cal Advocates, p. 5.

<sup>3</sup> All "Section" references are to the Public Utilities Code.

to the same 2021 safety culture assessments in both 2021 and 2022, utilities are under no obligation to demonstrate that their safety culture has improved since 2021, nor even that their current safety culture is satisfactory at all.”<sup>4</sup> However, as SCE, PG&E and SDG&E have shown in previous filings, under the plain language of Section 8389(e)(2), the “good standing” requirement is satisfied by an electric corporation agreeing to implement the findings of its most recent safety culture assessment.<sup>5</sup> The statute expressly states that the requirement “can be satisfied by the electric corporation having agreed to implement the findings of its most recent safety culture assessment.”<sup>6</sup> Cal Advocates attempted to expand this requirement previously, most recently in its comments on Energy Safety’s Draft Safety Certification Guidelines.<sup>7</sup> SCE, PG&E and SDG&E opposed this attempt in comments<sup>8</sup> and Energy Safety appropriately did not adopt Cal Advocates’ proposal. SCE has agreed to implement the findings of its most recent safety culture assessment, as demonstrated in its request, thus meeting the statutory requirement. The fact that the most recent assessment was performed over a year ago is irrelevant and no further obligation should be imposed.

### **SCE HAS MET THE IMPLEMENTATION REQUIREMENT OF SECTION 8389(E)(7) AS DOCUMENTED BY ITS QUARTERLY REPORTS**

Cal Advocates asserts that since utilities’ quarterly reports “consist of brief, high-level summaries with no outcome metrics or timelines...utilities have not met their burden ‘to demonstrate meaningful progress’ in implementing their safety culture assessments” as specified in Energy Safety’s 2022 Safety Certification Guidelines.<sup>9</sup> Section 8389(e)(7) requires that an electrical corporation “provide documentation” that it “is implementing its approved wildfire mitigation plan” and shows that this requirement is satisfied by documenting that the required quarterly reports have been submitted.<sup>10</sup> Energy Safety’s 2022 Safety Certification Guidelines state: “Safety Certification requests should highlight the progress made toward completing WMP targets and explain any delayed or off-track efforts.”<sup>11</sup> SCE’s safety certification request meets the implementation requirement via inclusion of its quarterly reports, which contain this material. SCE thus has met its burden for this requirement, and Cal Advocates’ claim to the contrary is without merit.

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<sup>4</sup> Cal Advocates Comments, p. 2.

<sup>5</sup> Section 8389(e)(2).

<sup>6</sup> Section 8389(e)(2).

<sup>7</sup> August 8, 2022 Cal Advocates’ Comments on Draft 2022 Safety Certification Guidelines.

<sup>8</sup> August 18, 2022 Joint Utilities’ Reply Comments on Draft 2022 Safety Certification Guidelines.

<sup>9</sup> Cal Advocates Comments, p. 4.

<sup>10</sup> Section 8389(e)(7)

<sup>11</sup> 2022 Safety Certification Guidelines, p. 6.

## **CONCLUSION**

Southern California Edison appreciates the opportunity to submit these reply comments. If you have any questions, or require additional information, please contact me at michael.backstrom@sce.com.

Sincerely,

//s//

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Southern California Edison