



August 12, 2022

Via Electronic Filing

Jessica Block, Chair
California Wildfire Safety Advisory Board
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814
wsab@energysafety.ca.gov

Subject: Public Advocates Office Comments on Wildfire Safety Advisory Board Draft Safety Culture Assessment Recommendations

Docket: #2023-WSAB-WMP-GPSCA

Dear Chairperson Block,

The Public Advocates Office (Cal Advocates) at the California Public Utilities Commission (CPUC) respectfully submits the following comments on the *Draft Recommendations of the Wildfire Safety Advisory Board on Safety Culture Assessment*. Cal Advocates appreciates the Wildfire Safety Advisory Board's (WSAB) careful consideration of electric utility safety culture, and the opportunity to provide the following comments.

For any questions relating to these comments, please contact Matthew Karle (Matthew.Karle@cpuc.ca.gov).

Sincerely,

/s/ Carolyn Chen
CAROLYN CHEN

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I. INTRODUCTION

On July 21, 2022, WSAB published for public comment the *Draft Recommendations of the Wildfire Safety Advisory Board on Safety Culture Assessment* (Draft Recommendations), to be considered at WSAB’s August 18, 2022 meeting. Public Utilities Code Section 8389 (b)(3) requires WSAB to make annual recommendations to the Office of Energy Infrastructure Safety (Energy Safety) regarding the appropriate scope and process for assessing the safety culture of electric utilities.¹ Pursuant to the Draft Recommendations,² stakeholders may submit comments on the recommendations by August 12, 2022.

Accordingly, Cal Advocates submits these comments, which address the following:

- Cal Advocates strongly supports WSAB’s recommendation that safety culture assessment surveys should include a broadly representative sample of utility employees, including contractors, engaged in prevention of or mitigation of wildfire risk. WSAB should consider a minimum target percentage requirement for contractor participation in safety culture assessment surveys.
- Cal Advocates agrees with WSAB’s recommendation that utilities should engage in proactive planning regarding changing climate, through inclusion of a climate assessment in the utility’s safety culture management self-assessment.
- Cal Advocates supports the majority of WSAB’s recommendations for future safety culture assessments.

II. DRAFT RECOMMENDATIONS

A. Cal Advocates agrees with WSAB’s recommendation for broadly representative employee samples in safety culture assessment surveys.

Cal Advocates strongly agrees with WSAB’s recommendations for inclusion of a broadly representative sample, including contractors, in safety culture assessment surveys. As long as the utilities continue to use contractors to complete wildfire mitigation work and other related safety initiatives, the utilities should be held responsible for any failures in the

¹ Many of the Public Utilities Code requirements relating to wildfires apply to “electrical corporations.” See, e.g., Public Utilities Code Section 8386. These comments use the more common terms “electric utilities,” “utilities,” or “IOUs,” and the phrase “electrical corporations” interchangeably to refer to the entities that must comply with the wildfire safety provisions of the Public Utilities Code.

² Wildfire Safety Advisory Board, *Draft Recommendations of the Wildfire Safety Advisory Board on Safety Culture Assessment*, Docket #2023-WSAB-WMP-GPSCA, July 21, 2022.

safety culture of contractors they have hired. Utilities must hold *all* employees and contractors to the same safety culture standard to ensure consistency and accountability.

Contractors have been nominally included in previous safety culture surveys, but their response rates have been extremely low relative to direct employees. This creates a significant blind spot in efforts to assess safety culture. For example, Pacific Gas and Electric Company (PG&E) has about 7,800 direct employees working on wildfire mitigation, compared to an estimated base of 9,000 contractors.³ Of the nearly 9,000 contractors, only 165 responded to the survey, about 9% of total respondents.⁴ Despite having an employee base of over 50% contractors doing wildfire mitigation work, contractor participation in the safety culture assessment survey was dramatically lower than direct employees.

Similarly, for Southern California Edison Company's 2021 Safety Culture Assessment survey,⁵ about 30% of respondents were contractors.⁶ And, in San Diego Gas & Electric Company's 2021 Safety Culture Assessment survey,⁷ contractors represented about 20% of total respondents.⁸

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³ *Pacific Gas and Electric Company 2021 Safety Culture Assessment*, Dekra, October 2021, p. 7.

⁴ PG&E received responses from 1,572 direct employees, and from 165 contractors. See *Pacific Gas and Electric Company 2021 Safety Culture Assessment*, Dekra, October 2021, pp. 7-8.

⁵ *Southern California Edison Company 2021 Safety Culture Assessment*, Dekra, September 2021, p. 7.

⁶ SCE received responses from 2,042 of its 5,306 direct employees working on wildfire mitigation, and from 861 contractors. SCE's assessment was not able to estimate the total size of the contractor population base working on wildfire mitigation. See *Southern California Edison Company 2021 Safety Culture Assessment*, pp. 7-8.

⁷ *San Diego Gas & Electric Company 2021 Safety Culture Assessment*, Dekra, September 2021, p. 7.

⁸ SDG&E received responses from 1,174 of its 1,474 direct employees working on wildfire mitigation, and from 291 contractors. SDG&E's assessment was not able to estimate the total size of the contractor population base working on wildfire mitigation. See *San Diego Gas & Electric Company 2021 Safety Culture Assessment*, pp. 7-8.

Table A 2021 Safety Culture Assessment Survey Responses by employee type			
	PG&E ²	SCE ¹⁰	SDG&E ¹¹
Direct Employees	1,572	2,042	1,174
Contractors	165	861	291

Given that contractors represent a significant (likely the majority) portion of the wildfire mitigation workforce at each utility, inadequate contractor representation in safety culture surveys is a significant detriment to our efforts to understand and impact utility safety culture.

For these reasons, Cal Advocates agrees with WSAB’s recommendation that Energy Safety should maintain the inclusion of contractors in safety culture assessments surveys. In addition, utilities should take affirmative action to ensure that they receive an adequate response rate to their surveys by both utility employees and contractors.¹² A robust response rate by a representative sample of both direct utility employees and contractors is crucial to making the findings of employee surveys meaningful. WSAB should consider whether a recommended minimum target percentage for contractor participation in survey inclusion should be required for safety culture assessment surveys.

B. Cal Advocates agrees with WSAB’s recommendation that utilities should engage in proactive planning regarding changing climate.

Cal Advocates agrees with WSAB that utilities should proactively plan with respect to the changing climate’s effects on safety, as part of a utility’s safety culture. However, it may be difficult to assess the extent to which this planning is taking place through the survey instruments available to the safety culture assessment process. As proactive

² *Pacific Gas and Electric Company 2021 Safety Culture Assessment*, Dekra, October 2021, p. 7.

¹⁰ *Southern California Edison Company 2021 Safety Culture Assessment*, Dekra, September 2021, p. 7.

¹¹ *San Diego Gas & Electric Company 2021 Safety Culture Assessment*, Dekra, September 2021, p. 7.

¹² Cal Advocates has commented previously that Energy Safety should encourage a higher target response rate for utilities’ employees and contractors. *Comments of the Public Advocates Office on the Office of Energy Infrastructure Safety’s Draft 2022 Safety Culture Assessment Guidelines for Electrical Corporations*, Docket #2022-SCAs, February 8, 2022, p. 5.

planning is a leadership responsibility, this climate change planning may be best addressed through inclusion in the utility’s safety culture management self-assessment, while actual plans and programs to adapt to changing climate remain a part of annual wildfire mitigation plan (WMP) filings.

C. Cal Advocates supports the majority of WSAB’s remaining recommendations.

Cal Advocates supports the majority of WSAB’s recommendations to improve future safety culture assessments and takes no position on (but does not oppose) the remaining recommendations. Specifically, in addition to those addressed above, Cal Advocates supports the following recommendations:

- Recommendation 1: Energy Safety should emphasize a “going beyond compliance” culture.
- Recommendation 3: Safety culture assessment should include consideration of workforce training and expertise, so as to ensure the proper worker (e.g., a Qualified Electrical Worker) had the correct training to safely work on wildfire issues.
- Recommendation 4: Innovation and change should be a key part of ongoing annual safety culture assessments.
- Recommendation 8: Energy Safety should incorporate consideration of a utility’s engagement with their communities in their safety culture assessment structure.
- Recommendation 9: Energy Safety could consider expanding assessment of a utility’s safety culture by engaging expected community partners to understand their perception of the utility’s safety culture and potential improvements.
- Recommendation 10: Energy Safety should include consideration of utility-customer interactions on vegetation management safety practices in their safety culture assessment structure.
- Recommendation 12: Utility practices to address power shutoff impacts on critical facilities such as hospitals, on traffic safety, on individual customers that have high power security needs, and on backup power generation should be considered in the safety culture assessment process.

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III. CONCLUSION

Cal Advocates thanks WSAB for bringing attention to these important safety culture issues.

Respectfully Submitted,

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