



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

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November 23, 2022

To: Stakeholders for Safety Culture Assessments

SUBJECT: Office of Energy Infrastructure Safety’s Response to the 2022 Wildfire Safety Advisory Board’s Recommendations on its Safety Culture Assessment Process

Dear Stakeholders:

Please find enclosed the Office of Energy Infrastructure Safety’s (Energy Safety’s) evaluation of the Wildfire Safety Advisory Board’s (WSAB’s) recommendations for the Safety Culture Assessment (SCA) process (Report). In accordance with Public Utilities Code section 8389(c), Energy Safety issued this Report to the California Public Utilities Commission.

Public Utilities Code section 8389(b) directs the WSAB to make recommendations to Energy Safety regarding the appropriate scope and process for assessing the safety culture of an electrical corporation. The WSAB issued its initial draft recommendations on the SCA process pursuant to Public Utilities Code section 8389(b) on July 21, 2022,¹ and revised draft recommendations on August 25, 2022.² The WSAB adopted these recommendations on August 30, 2022.³

Sincerely,

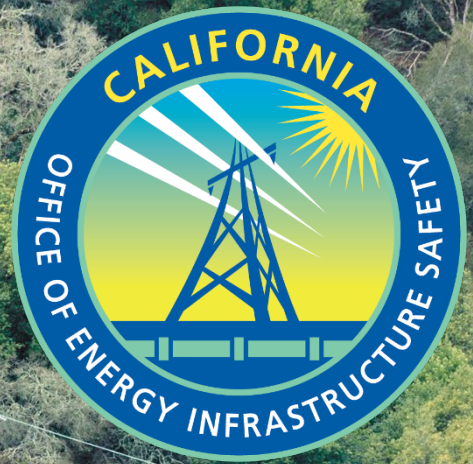
A handwritten signature in black ink that reads "Lucy C. Morgans".

Lucy Morgans
Program Manager
Electric Safety Policy Division
Office of Energy Infrastructure Safety

¹ [Recommendations of the Wildfire Safety Advisory Board on Safety Culture Assessment \(July 21, 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52709&shareable=true)
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52709&shareable=true>, accessed November 17, 2022).

² [Recommendations of the Wildfire Safety Advisory Board on Safety Culture Assessment \(Aug. 25, 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52972&shareable=true)
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52972&shareable=true>, accessed November 17).

³ [Recommendations of the Wildfire Safety Advisory Board on Safety Culture Assessment: Final August 31, 2022 \(adopted Aug. 30, 2022, published Sept. 2, 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53001&shareable=true)
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53001&shareable=true>, accessed November 17, 2022).



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY'S
EVALUATION OF THE WILDFIRE SAFETY
ADVISORY BOARD'S RECOMMENDATIONS
FOR THE SAFETY CULTURE ASSESSMENT
PROCESS**

November 2022

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1 INTRODUCTION

In accordance with Public Utilities Code section 8389(c),¹ this document fulfills the Office of Energy Infrastructure Safety's (Energy Safety's) statutory requirement to issue an analysis and recommendation to the California Public Utilities Commission (Commission or CPUC) on the recommendations from the Wildfire Safety Advisory Board (WSAB or Board) on Energy Safety's safety culture assessment process.

Public Utilities Code section 8389(b)² directs the WSAB to make recommendations to Energy Safety by June 30, 2020, and annually thereafter regarding:

1. Appropriate performance metrics and processes for determining each electrical corporation's compliance with its approved Wildfire Mitigation Plan (WMP)
2. Appropriate requirements in addition to the requirements set forth in Public Utilities Code section 8386 for the WMP
3. The appropriate scope and process for assessing the safety culture of an electrical corporation

The WSAB issued its initial draft recommendations on the safety culture assessment process on July 21, 2022,³ and revised draft recommendations on August 25, 2022.⁴ These recommendations were adopted by the WSAB on August 30, 2022.⁵

¹ [Public Utilities \(Pub. Util.\) Code section \(§\) 8389](https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC§ionNum=8389)

(https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC§ionNum=8389, accessed August 26, 2022).

² See footnote 1.

³ [Recommendations of the Wildfire Safety Advisory Board on Safety Culture Assessment \(July 21, 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52709&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52709&shareable=true>, accessed August 26, 2022).

⁴ [Recommendations of the Wildfire Safety Advisory Board on Safety Culture Assessment \(Aug. 25, 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52972&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52972&shareable=true>, accessed Aug. 26, 2022).

⁵ [Recommendations of the Wildfire Safety Advisory Board on Safety Culture Assessment: Final August 31, 2022 \(adopted Aug. 30, 2022, published Sept. 2, 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53001&shareable=true),

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53001&shareable=true>, accessed Sept. 2, 2022).

In accordance with Public Utilities Code section 8389(c), Energy Safety has analyzed and evaluated the WSAB's recommendations and provides its corresponding analysis and recommendations to the Commission below. The WSAB issued eight recommendations. Energy Safety proposes to incorporate, incorporate with adjustments, or not incorporate these into the 2023 SCA process proposal and subsequent SCA Guidelines as follows:

- Energy Safety proposes to incorporate two recommendations;
- Energy Safety proposes to incorporate with adjustments two sub-components of Recommendation 8;
- Energy Safety considers five recommendations to already be already incorporated in existing WMP and safety culture assessment processes; and
- Energy Safety does not propose to incorporate one recommendation and two sub-components of Recommendation 8 at this time.

See Tables 1 and 2 below for more details.

Table 1: Summary of Energy Safety’s Evaluation of the WSAB’s Recommendations for the SCA Process⁶

Incorporate	Incorporate with adjustments	No action taken by Energy Safety (do not incorporate at this time or already incorporated)
<p>1. Emphasize a “going beyond compliance” culture.</p> <p>5. Safety culture assessment should include consideration of revised workforce safety protocols and workforce training practices as wildfire safety technologies change.</p>	<p>8. Examples of areas where metrics could be developed:</p> <p>8.b Risks that arise as changing climate and vegetation may imply changes in safety practices over a longer horizon.</p> <p>8.d How a wildfire safety culture could best incorporate consideration of utility-customer interactions on vegetation management safety practices.</p>	<p>2. Energy Safety should ensure that the surveys to assess safety culture at utilities include any workforce component that may involve faults that could trigger a wildfire. (Already incorporated.)</p> <p>3. Safety culture assessment should include consideration of workforce training and expertise. (Already incorporated.)</p> <p>4. Innovation and change should be a key part of ongoing annual safety culture assessments. (Already incorporated.)</p>

⁶ The number assigned to each recommendation corresponds with the numbers assigned in the “Recommendations of the Wildfire Safety Advisory Board on Safety Culture Assessment: Final August 31, 2022.”



Incorporate



Incorporate with adjustments



**No action taken by Energy Safety
(do not incorporate at this time or
already incorporated)**

		<p>6. Energy Safety should enhance where appropriate consideration of a utility’s engagement with their communities in their safety culture assessment structure. (Already incorporated.)</p> <p>7. 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. (Already incorporated.)</p>
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Incorporate



Incorporate with adjustments



**No action taken by Energy Safety
(do not incorporate at this time or
already incorporated)**

		<p>8. The WSAB encourages Energy Safety, in collaboration with the CPUC, the utilities, and other interested stakeholders, to, over time, develop a portfolio of wildfire safety culture performance metrics that aim to facilitate assessment of wildfire safety risks and engage alternative viewpoints that are not currently considered in safety culture assessments. (Do not incorporate.)</p> <p>Examples of areas where metrics could be developed:</p> <p>8.a Risks from cyberattacks during wildfires so that these risks can eventually be incorporated in wildfire safety culture assessment structures. (Do not incorporate.)</p>



Incorporate



Incorporate with adjustments



**No action taken by Energy Safety
(do not incorporate at this time or
already incorporated)**

 <p>Incorporate</p>	 <p>Incorporate with adjustments</p>	 <p>No action taken by Energy Safety (do not incorporate at this time or already incorporated)</p>
		<p>8.c How customer and community partners' perception of utility safety practices and performance can be incorporated in assessments of a utility's wildfire safety culture. (Do not incorporate.)</p>

2 EVALUATION OF THE WSAB’S RECOMMENDATIONS FOR THE SCA PROCESS

The table below presents the WSAB’s recommendations in the left-hand column, Energy Safety’s recommendations in the middle column, and Energy Safety’s analysis explaining its recommendations in the right-hand column.

Table 2: Energy Safety’s Evaluation of the WSAB’s Recommendations for the SCA Process

WSAB Recommendation	Energy Safety’s Recommendation	Energy Safety’s Analysis
<p>1. Energy Safety should initiate a discussion in the safety culture assessment process to emphasize a “going beyond compliance” culture.</p>	<p>Incorporate.</p> <p>Energy Safety proposes adding the following sentence to the 2023 SCA process document in the instructions to electrical corporations regarding their reporting on the previous year’s SCA recommendations:</p> <p>“Energy Safety expects [electrical corporation] to, where possible, go beyond Energy Safety’s SCA recommendations in enhancing the robustness of its safety culture. In next year’s SCA report on progress on the recommendations, please include descriptions of any steps that [electrical corporation] has taken to exceed the past year’s SCA recommendations.”</p>	<p>Energy Safety expects this prompt to encourage electrical corporations to expand their descriptions of progress on the previous year’s SCA recommendations to include any instances of the electrical corporation exceeding the recommendations.</p>

WSAB Recommendation	Energy Safety’s Recommendation	Energy Safety’s Analysis
<p>2. Energy Safety should ensure that the surveys to assess safety culture at utilities include a broad workforce template, from system designers through troubleshooters and repairers – any workforce component (utility personnel or contractors) that may involve faults that could trigger a wildfire.</p>	<p>Already incorporated.</p>	<p>The workforce survey targets electrical corporation employees, supervisors, managers, and contractors who spend at least 10% of their time engaged in wildfire mitigation activities (conducting work related to the electrical corporation’s most recent wildfire mitigation plan as defined by any initiative listed within that plan). This encompasses the workforce that WSAB intends to include with this recommendation.</p>
<p>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.</p>	<p>Already incorporated.</p>	<p>Assessing the level of training required for different work assignments is beyond the scope of the SCA process. The Wildfire Mitigation Plan Guidelines require reporting on the level of training of the wildfire mitigation workforce (e.g., the section “Planning for Workforce and Other Limited Resources”).</p>
<p>4. Innovation and change should be a key part of ongoing annual safety culture assessments.</p>	<p>Already incorporated.</p>	<p>Information about an electrical corporation’s changing practices in response to major trends is captured by the current SCA process, which</p>

WSAB Recommendation	Energy Safety’s Recommendation	Energy Safety’s Analysis
		<p>asks how electrical corporations incorporate both leading (forward-looking) and lagging (backward-looking) indicators in its safety culture planning and practices. Additionally, electrical corporations are required to report on lessons learned since the last assessment, which should capture elements of innovation and change.</p>
<p>5. Safety culture assessment should include consideration of revised workforce safety protocols and workforce training practices as wildfire safety technologies change.</p>	<p>Incorporate. Energy Safety proposes to cover the question of how new technologies affect workplace safety and whether the workforce feels adequately trained to address new risks introduced by new technology in the follow-up interviews pursuant to the management self-assessment and focus groups pursuant to the workforce survey.</p>	<p>Energy Safety is aware that new equipment and materials can introduce new risks to the wildfire mitigation workforce (e.g., metal utility poles are much heavier than wood poles) and is interested in how electrical corporations are taking that new risk into consideration in its safety culture practices.</p>
<p>6. Energy Safety should enhance where appropriate consideration of a utility’s engagement with their communities in their safety culture assessment structure.</p>	<p>Already incorporated.</p>	<p>An electrical corporation’s engagement with its communities is addressed in the Wildfire Mitigation Plan Guidelines under the “Stakeholder Cooperation and Community Engagement” section, which addresses an electrical corporation’s engagement with its</p>

WSAB Recommendation	Energy Safety’s Recommendation	Energy Safety’s Analysis
		communities.
<p>7. 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.</p>	<p>Already incorporated.</p>	<p>The measures an electrical corporation takes to mitigate the impacts of PSPS on critical facilities are already addressed in the Wildfire Mitigation Plan Guidelines under the “Public Safety Power Shutoff (PSPS)” section.</p>
<p>8. The WSAB encourages Energy Safety, in collaboration with the CPUC, the utilities, and other interested stakeholders, to over time develop a portfolio of wildfire safety culture performance metrics that aim to facilitate assessment of wildfire safety risks and engage alternative viewpoints that are not currently considered in safety culture assessments. As discussed in this document, examples of potential areas where performance metrics could be developed are:</p>	<p>Do not incorporate at this time.</p>	<p>Safety culture performance metrics are already being tracked through the management self-assessment and workforce survey.</p> <p>Energy Safety welcomes suggestions for metrics to consider in addition to the ones already being tracked. Its responses to the WSAB’s suggestions on potential areas for possible new metrics are below.</p>
<p>8.a [U]nderstanding the risks of cyberattacks during wildfires so that these risks can eventually be</p>	<p>Do not incorporate at this time.</p>	<p>This falls within the CPUC’s jurisdiction. The CPUC has been developing and recommending safety</p>

WSAB Recommendation	Energy Safety’s Recommendation	Energy Safety’s Analysis
<p>incorporated in wildfire safety culture assessment structures.</p>		<p>policy on regulation of physical and cyber security for electrical corporations in CPUC proceedings.⁷</p>
<p>8.b [U]nderstanding the risks that arise as changing climate and vegetation may imply changes in safety practices over a longer horizon.</p>	<p>Incorporate with adjustments. Energy Safety proposes to include questions in its workforce focus groups about the electrical corporation’s approach to protecting outdoor workers from heat exposure. Heat-related workforce safety concerns were discussed in the 2021 workforce focus groups.</p>	<p>Energy Safety is proposing incorporating questions about the workforce’s experience of electrical corporations’ safety practices regarding heat exposure in the workforce focus groups because the workforce is already experiencing extreme heat exposure in part due to climate. change.</p>
<p>8.c [U]nderstanding how customer and community partners’ perception of utility safety practices and performance can be incorporated in assessments of a utility’s wildfire safety culture.</p>	<p>Do not incorporate at this time.</p>	<p>Expanding the scope of the SCA process to include assessments of an electrical corporation’s safety culture program through the eyes of outside stakeholders likely would have limited value unless those outside stakeholders were also members of</p>

⁷ See [the CPUC’s Safety Policy Division webpage](https://www.cpuc.ca.gov/about-cpuc/divisions/safety-policy-division) (https://www.cpuc.ca.gov/about-cpuc/divisions/safety-policy-division, accessed September 13, 2022). See also CPUC Decision 11-07-056 (privacy protection for customer usage data generated by advanced meters) and Senate Bill 17 (Padilla), Chapter 327, Statutes of 2009 (cybersecurity in grid modernization efforts).

WSAB Recommendation	Energy Safety’s Recommendation	Energy Safety’s Analysis
		the electrical corporation’s workforce.
<p>8.d [U]nderstanding how a wildfire safety culture could best incorporate consideration of utility-customer interactions on vegetation management safety practices.</p>	<p>Incorporate with adjustments.</p> <p>In the 2021 workforce focus groups, participants discussed hostile interactions with property owners, particularly experienced by workforce out in the field assessing the impact of high wind on overhead wires (to assess the need for a PSPS) and performing vegetation management activities. As a follow-up to the recommendation that was given to all the large electrical corporations on this issue, Energy Safety proposes including questions about this issue in its 2023 workforce focus groups and may consider expanding that line of inquiry to other parts of the SCA process.</p>	<p>Energy Safety considers it within the scope of the current SCA process to ask the electrical corporation more about its interactions with customers and property owners in the course of wildfire mitigation activities</p>

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