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VIA E-MAIL

Caroline Thomas Jacobs
Director, Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: Joint IOU Comments to Draft 2023 Safety Culture Assessment Guidelines

Dear Director Thomas Jacobs:

San Diego Gas & Electric (“SDG&E”), Pacific Gas and Electric (“PG&E”), and Southern California Edison (“SCE”), together the joint investor-owned utilities (“Joint IOUs”), hereby provide comments to The Office of Energy Infrastructure Safety’s (“Energy Safety”) Draft 2023 Safety Culture Assessment Guidelines (“Draft Guidelines”).

I. DISCUSSION

The Joint IOUs believe the best way to maximize the safety culture assessment (“SCA”) process would be to create and adhere to a defined and consistent schedule from year to year. A consistent schedule with significant notice will allow all parties appropriate planning time to ensure resources are available to complete the assessment. To this end, the Joint IOUs propose that Energy Safety utilize for the 2023 process a timeline like the one proposed in 2021 and described below:

Proposed Schedule for 2023 SCA process:

- May 25: SCA Kickoff
- May 26 – June 23: Management self-assessment
- June 20 – July 10: Management interviews and public workshop
- June 12 – June 30: Workforce survey & planning for workforce focus groups
- July 1 – 31: Focus groups
- September: Final SCA report

The proposed timeline begins the SCA process in May, which will allow for sufficient time for interviews to be conducted in the summer and avoid the administration of surveys during the peak summer and fall wildfire season.

Additionally, the Joint IOUs believe the process could be further improved by regularly coordinating the timing of the SCA with other ongoing safety culture efforts (e.g., Safety Culture OIR, IOU self-assessments, RAMP) to avoid duplication of efforts and skewed results. Coordination will minimize resource constraints, reduce the potential associated survey fatigue, which could hinder survey participation and provide the best and most accurate results for all involved parties. Further, as the California Public Utilities Commission continues to develop a comprehensive safety culture assessment framework, the Joint IOUs recommend Energy Safety continue to identify means to target and address wildfire safety efforts through its own annual survey. Two distinct processes will reduce the potential for confusion and conflicting or duplicative regulatory recommendations. After the comprehensive framework is adopted by the Commission, the Joint IOUs recommend Energy Safety consider integrating its wildfire safety culture assessment process with the comprehensive safety culture framework.

Conclusion

The Joint IOUs appreciate Energy Safety's consideration of these comments on the Draft 2023 Safety Culture Assessment Guidelines, and request that Energy Safety take these recommendations into account in the final guidelines.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company