



Laura M. Fulton
Senior Counsel
8330 Century Park Court, CP32F
San Diego, CA 92123-1548

LFulton@SDGE.com

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

SDG&E Draft 2023 Safety Certification Guidelines Comments

Dear Director Thomas Jacobs:

San Diego Gas & Electric (“SDG&E”) hereby provides comments addressing the Draft 2023 Safety Certification Guidelines (“Draft Guidelines”) issued by the Office of Energy Infrastructure Safety (“Energy Safety”) on May 3, 2023. SDG&E generally supports the adoption of the 2023 Draft Guidelines and recommends minor modifications to two areas.

I. Energy Safety Should Refrain From Including Discussion of the California Public Utilities Commission Safety Culture Assessments Conducted Pursuant to Section 8386.2 of the Public Utilities Code

In discussing the means by which an electrical corporation may meet the “good standing” requirement of Public Utilities Code Section 8389(e)(2), Energy Safety includes that “[i]f a safety culture assessment has been carried out pursuant to Public Utilities Code section 8386.2, the electrical corporation must also document in its submission an agreement to implement the findings of that safety culture assessment.”¹ The CPUC continues to address implementation of its safety culture assessment process for electrical and gas corporations through an ongoing rulemaking, (R.)21-10-001. As the process to develop a safety culture assessment framework for the organization-wide safety cultures of the large investor-owned utilities is ongoing, it is nearly impossible that the CPUC will have conducted a safety culture assessment pursuant to Public Utilities Code Section 8386.2 by the time the electrical corporations request a safety certification for 2023. To avoid any potential confusion in assessing the electrical corporations’ 2023 safety certification requests, SDG&E requests that this language be removed from the 2023 Draft Guidelines.

¹ Draft Guidelines at 2.

II. Tracking Board of Directors Safety Committee Recommendations Should Be Limited to Recommendations Implemented During the Quarter

Energy Safety proposes to revise and standardize the format by which the electrical corporations report on WMP-implementation, implementation of the safety culture assessment recommendations, and progress on Board of Directors Safety Committee recommendations. To date, SDG&E has been reporting on its “implementation of the safety committee recommendations from the electrical corporation’s previous quarterly notification and information-only submittal.”² The Draft Guidelines are somewhat unclear regarding if Energy Safety proposes to expand reporting on *all* prior Safety Committee recommendations, in asking for a “list of recommendations made in the previous quarter (or earlier), including the meeting date of each recommendation and describing progress made on the implementation of the recommendation.”

To the extent Energy Safety proposes that the electrical corporations submit a quarterly update that includes all past recommendations, SDG&E recommends that Energy Safety revisit this proposal to avoid it becoming unduly burdensome in future submissions. SDG&E’s Board Safety Committee meets at least quarterly; over the years, including all recommendations in the submission could become cumbersome. Rather, SDG&E requests that it be able to continue its practice of reporting on whether, during the prior quarter, SDG&E implemented or responded to any prior Board Safety Committee recommendations. This is consistent with the language of the statute and avoids the potential for the quarterly submissions to become repetitive. At a minimum, to avoid redundancy in reporting, SDG&E should not be required to include in its list any recommendations that have been noted as completed in prior quarterly notifications. SDG&E will keep such a list of completed recommendations available upon request.

Conclusion

SDG&E requests that Energy Safety take these recommendations into account in the Final 2023 Safety Certification Guidelines.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company

² Pub. Util. Code §8389(e)(7).