



Michael Backstrom  
Vice President, Regulatory Affairs

June 21, 2023

Lucy Morgans  
Program Manager  
Electric Safety Policy Division  
Office of Energy Infrastructure Safety  
California Natural Resources Agency  
715 P Street 20th Floor  
Sacramento, CA 95814

**E-filed with Docket #2022-SCAs**

**SUBJECT:** Southern California Edison Company's Agreement to Implement the Findings (Including Recommendations) of the 2022 Safety Culture Assessment Report

Dear Ms. Morgans,

Pursuant to Public Utilities Code Section 8389(e)(2), SCE can satisfy the "good standing" requirement for safety certification by agreeing "to implement the findings of its most recent safety culture assessment" (SCA). Energy Safety's letter of May 8th, 2023, enclosing SCE's 2022 Safety Culture Assessment Report (SCA report), states that SCE may do so "by submitting a letter to this effect [to] the 2022 Safety Culture Assessments docket."

National Safety Council (NSC), a consultant retained by Energy Safety, conducted the 2022 SCA for SCE between July and November 2022. On April 17, 2023, Energy Safety released the draft 2022 SCA Report for SCE for comment. Pursuant to the guidance from Energy Safety, SCE met with Energy Safety and NSC on April 26, 2023, and submitted comments on May 1, 2023. On May 8, 2023, Energy Safety issued the SCA report attaching SCE's comments to the draft report.<sup>1</sup> The recommendations by Energy Safety on SCE's 2022 SCA and SCE's response to these recommendations are described below.

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<sup>1</sup> 2022 Safety Culture Assessment Report for SCE, available at:  
[TN12209\\_20230508T150452\\_SCE\\_2022\\_SCA\\_Report\\_with\\_cover\\_letter.pdf](https://www.sce.com/~/media/Files/2023/05/08/T150452_SCE_2022_SCA_Report_with_cover_letter.pdf)

The report states that “SCE’s 2022 management self-assessment demonstrates an organization that is committed to safety”<sup>2</sup> and “[f]ocus groups with frontline employees and supervisors revealed positive and optimistic perceptions regarding SCE’s safety culture.”<sup>3</sup> The report makes four recommendations to drive consistent improvements in SCE’s safety culture:<sup>4</sup>

1. Continue to Build SCE’s Capacity as a Learning Organization (Recommendation 3.1): SCE should build its capacity as a learning organization, taking a proactive approach to incorporating feedback to improve organizational processes, by:
  - Focusing on improving safety-enabling systems such as incident investigation and root cause analysis.
  - Increasing the quality of incident and near-miss reports submitted by frontline workers.
  - Increasing opportunities for frontline workers and contractors to discuss lessons learned from safety events.
  - Developing an action plan to ensure that frontline leaders are implementing training concepts such as coaching conversations.
2. Optimize Safety Communications Between Leadership and Frontline Workers (Recommendation 3.2): SCE should optimize its safety communications between leadership and frontline workers by considering deploying an incident management team liaison to the field during incidents and implementing regular cross-departmental topic-specific listening sessions to develop better understanding of frontline issues and recognize workers’ accomplishments.
3. Mitigate Risk Exposure Posed by Interactions with the Public (Recommendation 3.3): SCE should continue to recognize and take action to mitigate the risk exposure posed by interactions with the public by:
  - Focusing on encouraging frontline workers to report these incidents.
  - Continuing to track incidents and further developing its strategy for managing this risk exposure.
  - Improving bilingual support resources for Spanish-speaking vegetation management crews to assist with de-escalation.

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<sup>2</sup> SCA report, p. 3.

<sup>3</sup> *Ibid.*

<sup>4</sup> SCA report, p. 4.

4. Improve Training for Frontline Workers on New Technologies Related to Wildfire Mitigation (Recommendation 3.4): SCE should improve its training for frontline workers on new technologies related to wildfire mitigation, in particular rapid earth fault current limiter (REFCL) devices.

By this letter, SCE agrees to implement all of the findings and recommendations in the SCA report, thereby meeting the “good standing” requirement of Section 8389(e)(2). If you have any questions, or require additional information, please contact me at [michael.backstrom@sce.com](mailto:michael.backstrom@sce.com).

Sincerely,

*//s//*

Michael Backstrom  
Vice President, Regulatory Affairs  
Southern California Edison

CC: