



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

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December 22, 2023

To: Stakeholders for Wildfire Mitigation Plans and Safety Culture Assessments

SUBJECT: Office of Energy Infrastructure Safety's Response to the Wildfire Safety Advisory Board's Recommendations for the Wildfire Mitigation Plan Guidelines and Safety Culture Assessment Process

Dear Stakeholders:

Attached please find the Office of Energy Infrastructure Safety's (Energy Safety's) evaluation of the Wildfire Safety Advisory Board's recommendations for the Wildfire Mitigation Plan Guidelines and Safety Culture Assessment Process. Pursuant to Public Utilities Code section 8389(c), Energy Safety provided its evaluation and recommendations to the California Public Utilities Commission on July 31, 2023.

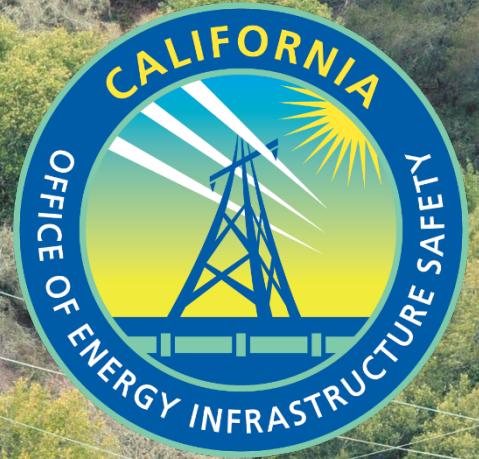
The Wildfire Safety Advisory Board issued its draft recommendations on the Wildfire Mitigation Plan Guidelines and Safety Culture Assessment Process pursuant to Public Utilities Code section 8389(b) on May 23, 2023.¹ These recommendations were adopted by the Wildfire Safety Advisory Board on June 13, 2023.²

Sincerely,

Shannon O'Rourke
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

¹ [Draft Recommendations to the Office of Energy Infrastructure Safety on Additional Wildfire Mitigation Plan Requirements and Performance Metrics, and Safety Culture Assessment \(May 23, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53985&shareable=true)
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53985&shareable=true>, accessed Dec. 22, 2023).

² [Recommendations to the Office of Energy Infrastructure Safety on Additional Wildfire Mitigation Plan Requirements and Performance Metrics, and Safety Culture Assessment \(June 13, 2023, published June 22, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=54182&shareable=true)
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=54182&shareable=true>, accessed Dec. 22, 2023).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
EVALUATION OF THE WILDFIRE SAFETY
ADVISORY BOARD'S RECOMMENDATIONS
FOR THE WILDFIRE MITIGATION PLAN
GUIDELINES AND SAFETY CULTURE
ASSESSMENT PROCESS

December 2023

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1 INTRODUCTION

In accordance with Public Utilities Code section 8389(c),¹ this document sets forth the analysis and recommendation of the Office of Energy Infrastructure Safety (Energy Safety) to the California Public Utilities Commission (Commission or CPUC) on recommendations from the Wildfire Safety Advisory Board (WSAB or Board).

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

- Appropriate performance metrics and processes for determining each electrical corporation's compliance with its approved Wildfire Mitigation Plan (WMP)
- Appropriate requirements in addition to the requirements set forth in Public Utilities Code section 8386² for the WMP
- The appropriate scope and process for assessing the safety culture of an electrical corporation

On May 23, 2023, the WSAB issued its "Draft Recommendations to Office of Energy Infrastructure Safety on Additional Wildfire Mitigation Plan Requirements and Performance Metrics, and Safety Culture Assessment" for public comment.³ The WSAB adopted its final "Recommendations to Office of Energy Infrastructure Safety on Additional Wildfire Mitigation Plan Requirements and Performance Metrics, and Safety Culture Assessment" (the WSAB's Recommendations Report) recommendations at its quarterly meeting on June 13, 2023.⁴ The

¹ [Public Utilities Code section 8389](#)

(https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC§ionNum=8389, accessed June 28, 2023).

² [Public Utilities Code Section 8386](#)

(https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC§ionNum=8386, accessed July 13, 2023).

³ [Draft Recommendations to the Office of Energy Infrastructure Safety on Additional Wildfire Mitigation Plan Requirements and Performance Metrics, and Safety Culture Assessment \(May 2023\)](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53985&shareable=true>, accessed Dec. 13, 2023).

⁴ [Recommendations to the Office of Energy Infrastructure Safety on Additional Wildfire Mitigation Plan Requirements and Performance Metrics, and Safety Culture Assessment \(June 2023\)](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=54182&shareable=true>, accessed Dec. 13, 2023).

WSAB's Recommendations Report provided recommendations on the Wildfire Mitigation Plan Guidelines and Energy Safety's safety culture assessment (SCA) process.

The WSAB's Recommendations Report did not include any recommendations for new WMP requirements additional to the statutory requirements set forth in Public Utilities Code section 8386.

In total, the WSAB's Recommendations Report included nine recommendations in relation to the WMP Guidelines. Energy Safety has evaluated each of these and categorizes them into (i) incorporate, (ii) incorporate with adjustments, or (iii) do not incorporate the recommendations into the WMP Guidelines at this time (see Tables 2.1-2.3 for more details). In summary, Energy Safety proposes to:

- Incorporate one recommendation.
- Incorporate seven recommendations with adjustments.
- Not incorporate one recommendation at this time.

The WSAB issued eight recommendations in relation to the SCA process. Energy Safety's SCA process is pending revision at this time. As such, Energy Safety is refraining from incorporating any WSAB recommendations into the 2024 SCA process. Where Energy Safety agrees with a WSAB recommendation, Energy Safety will consider it further and potentially integrate it into future iterations of the SCA process. Energy Safety has evaluated each of the recommendations from the WSAB on the SCA process and categorizes them as (i) already incorporated, (ii) potentially incorporate in the future, or (iii) do not incorporate into the SCA process proposal at this time (see Table 3.1 for more details).

In summary, Energy Safety:

- Considers three recommendations to have already been incorporated into the 2024 SCA process proposal.
- Proposes the Commission and Energy Safety consider incorporating four recommendations in future SCA processes.
- Proposes not to incorporate one recommendation.

Table 1-1: Summary of Energy Safety’s Evaluation of the WSAB’s Recommendations for the WMPs⁵



Incorporate



Incorporate with Adjustments



Do Not Incorporate

<ul style="list-style-type: none"> • 1.3 – Table of Contents 	<ul style="list-style-type: none"> • 1.1 – Executive Summary • 1.2 – Citation of Guidelines • 2.1 – Local Agency Coordination • 2.2 – Providing Public Safety Power Shutoff (PSPS) Information 	<ul style="list-style-type: none"> • 1.4 – Interactive WMP Webpage
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⁵ The number assigned to each recommendation corresponds with the numbers assigned in the “Recommendations to Office of Energy Infrastructure Safety on Additional Wildfire Mitigation Plan Requirements and Performance Metrics, and Safety Culture Assessment” (adopted June 13, 2023). For example, recommendation 1.4 is the fourth recommendation in Section 1 of the WSAB’s Recommendations.

Table 1-2: Summary of Energy Safety’s Evaluation of the WSAB’s Recommendations for the SCA Process



Already Incorporated



Potentially Incorporate in the Future



Do Not Incorporate

<ul style="list-style-type: none"> • 1 – Workforce Survey Addition (Alerting decisionmakers about safety hazards) • 2 – Workforce Survey Addition (Independent decisions) • 3 – Workforce Survey Addition (Reporting false alarms) 	<ul style="list-style-type: none"> • 4 – Workforce Survey Addition (Pointing out managerial behavior) • 5 – Workforce Survey Addition (Communication with other work teams/contractors) • 6 – Management Self-Assessment Addition (Safety matter coordination) • 8 – Management Self-Assessment Addition (Cross-Utility safety information sharing) 	<ul style="list-style-type: none"> • 7 – Partnering with External Safety Experts
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2 EVALUATION OF THE WSAB'S RECOMMENDATIONS FOR THE WMPS

The tables below present 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.

The tables are organized based on the three main categories in the WSAB's Recommendations Report: (1) Structure and Scope, (2) System Design and Operation, and (3) Communication and Community Outreach.

2.1 Recommendations for the WMPs

2.1.1 Structure and Scope

Table 2-1: Energy Safety’s Evaluation of the WSAB’s Recommendations for the WMPs: Structure and Scope

WSAB Recommendation	Energy Safety Recommendation	Analysis
<p>1.1 - Executive Summary</p> <p>The executive summary should serve as a standalone document, precede the table of contents, and include all of the key targets and cost estimates for the reporting period by program categories (e.g., grid design and system hardening, community outreach and engagement). The utilities⁶ should include this information in a table similar to that of the example shown in Appendix A.</p>	<p>Incorporate with adjustments.</p> <ul style="list-style-type: none"> Energy Safety agrees that the current structure of the executive summary can be improved and will revisit this recommendation for the next 2026-2028 WMP Guidelines. 	<ul style="list-style-type: none"> Energy Safety is reserving any changes to the upcoming 2025 WMP Update Guidelines for high priority items that fit within the objectives for the update year. This recommendation and many others below will be revisited in drafting the 2026-2028 WMP Guidelines.
<p>1.2 - Citation of Guidelines</p> <p>Statutory or specific guidelines included in the relevant sections should be placed in the footnotes or</p>	<p>Incorporate with adjustments.</p> <ul style="list-style-type: none"> Energy Safety proposes to incorporate this recommendation with adjustments, Energy Safety will provide guidance to 	<p>Energy Safety currently does not include guidance pertaining to the citation of statutory or specific guidelines. Electrical corporations should not be repeating the Technical Guidelines at the start of each section and Energy Safety will</p>

⁶ In this document, “utilities” should be understood to mean “electrical corporations”.

WSAB Recommendation	Energy Safety Recommendation	Analysis
<p>endnotes. See the before and after example in Appendix B.</p>	<p>the electrical corporations that the Technical Guidelines should not be repeated in WMP submissions, inclusive of including foot/endnotes.</p>	<p>include this guidance in the 2026-2028 WMP Guidelines.</p>
<p>1.3 – Table of Contents</p> <p>The table of contents should have hot links for ease of access. Also, the list of tables/figures should be put in an appendix.</p>	<p>Incorporate.</p> <ul style="list-style-type: none"> Energy Safety proposes to clarify the table of contents “hot links” requirement and move the lists of tables and figures into an appendix in the 2026-2028 WMP Guidelines. 	<ul style="list-style-type: none"> The 2023-2025 WMP Technical Guidelines require the use of hyperlinks for figures and tables. Electric bookmarks for major divisions are also required for PDF submissions. Energy Safety will re-evaluate the wording of the hyperlink requirements to make clear that the table of contents should include “hot links.” Removing the lists of tables and figures would downsize the table of contents, which can be up to 30 pages in length as is.
<p>1.4 - Interactive WMP Webpage</p> <p>The utilities should develop an interactive webpage to accompany the WMP submission that includes a map showing targeted projects, where known. The utilities should also include summary materials showing the targets by program over the WMP planning period and what goals have been accomplished to date. Additionally, they should describe</p>	<p>Do not incorporate.</p> <ul style="list-style-type: none"> This recommendation is not within the currently considered scope of the 2025 WMP Update Guidelines or 2026-2028 WMP Guidelines and will not be incorporated at this time. 	<p>While this feature would be beneficial for stakeholders and customers to learn about where and when wildfire mitigation projects will occur, it is outside of Energy Safety’s scope for the WMP Guidelines. Energy Safety will consider providing an option for the electrical corporations to provide this information without requiring it.</p>

WSAB Recommendation	Energy Safety Recommendation	Analysis
<p>their mitigation operations and technologies for the average customer.</p>		

2.1.2 System Design and Operation

Table 2-2: Energy Safety’s Evaluation of the WSAB’s Recommendations for the WMP Guidelines: System Design and Operation

WSAB Recommendation	Energy Safety Recommendation	Analysis
<p>2.1 - Local Agency Coordination Where known and feasible, the utilities should incorporate local public works plans or trenching efforts from partner agencies such as communications or sewage providers into the prioritization and planning of their undergrounding efforts.</p>	<p>Incorporate with adjustments.</p> <ul style="list-style-type: none"> Energy Safety proposes to ask utilities how they take local plans and projects into consideration and ensure that some form of coordination is occurring within the 2026-2028 WMP Guidelines. 	<ul style="list-style-type: none"> Energy Safety acknowledges the importance and efficiency of working with local public works projects but wants to ensure prioritization still occurs to maximize wildfire risk reduction, first and foremost.

WSAB Recommendation	Energy Safety Recommendation	Analysis
<p>2.2 - Providing PSPS Information</p> <p>The utilities need to provide their assumptions and essential information in their WMPs that are used to estimate the benefits of PSPS avoidance and/or outage avoidance for each program.</p>	<p>Incorporate with adjustments.</p> <ul style="list-style-type: none"> Energy Safety proposes to continue to evaluate this recommendation in conjunction with the findings from current modeling efforts/studies and re-visit this during the 2026-2028 WMP Guidelines. 	<ul style="list-style-type: none"> Energy Safety’s current guidelines require the utilities to have (available upon request) documentation for PSPS assumptions and detailed information. Energy Safety acknowledges that this area could be clearer and will re-evaluate the requirement in the next Base Year Guidelines. Energy Safety will evaluate findings from on-going relevant modeling studies to inform the next Base Year years.
<p>2.3 - Communicating Mitigation Efforts</p> <p>The utilities need to clearly communicate how they estimate the effectiveness of their mitigations and how they control for factors such as weather and the effects of other wildfire mitigation programs to explain how ignition reductions can reasonably be attributed to specific mitigation efforts.</p>	<p>Incorporate with adjustments.</p> <ul style="list-style-type: none"> Energy Safety proposes that the utilities be required to estimate the effectiveness of their mitigations, including the evaluation of specific ignition drivers in the 2026-2028 WMP Guidelines. 	<ul style="list-style-type: none"> Energy Safety proposes to include this recommendation into the updates within the RSE/cost benefit section of the 2026-2028 WMP Guidelines. Energy Safety does not recommend incorporating the weather control factor, as this is currently too complicated. However, this is something that can be looked at in the future.

2.1.3 Communication and Community Outreach

Table 2-3: Energy Safety’s Evaluation of the WSAB’s Recommendations for the WMP Guidelines: Communication and Community Outreach

WSAB Recommendation	Energy Safety Recommendation	Analysis
<p>3.1 - Communicating Mitigation Efforts When the utilities are aware of conditions that may either trigger Protective Equipment and Device Settings ^[7] outages or have already triggered such outages, they should communicate this information where feasible on their website to the same stakeholders and partners that they would communicate with for PSPS events. This includes but is not limited to public safety partners and local governments, as well as stakeholders and customers.</p>	<p>Incorporate with adjustments.</p> <ul style="list-style-type: none"> Energy Safety will consider requiring electrical corporations to provide their communication and outreach strategy for Protective Equipment and Device Settings) in the 2026-2028 WMP Guidelines. 	<ul style="list-style-type: none"> Energy Safety currently does not ask electrical corporations for their Protective Equipment and Device Settings communication strategy. Energy Safety acknowledges that communicating every potential curve outage resulting from Protective Equipment and Device Settings could result in a significant over-notification and therefore will keep this in mind when considering new requirements.
<p>3.2 - HFTD Communication The utilities should expand on the already recognized communication platforms and services for HFTD customers affected by</p>	<p>Incorporate with adjustments.</p> <ul style="list-style-type: none"> Energy Safety will consider including requirements for utilities to provide their communication and outreach strategy for Protective Equipment and Device Settings 	<ul style="list-style-type: none"> Energy Safety currently does not ask electrical corporations for their Protective Equipment and Device Settings communication strategy.

⁷ The WSAB use the term enhanced powerline safety settings (EPSS) which is a term that Pacific Gas and Electric company (PG&E) use to describe Protective Equipment and Device Settings. Energy Safety has changed all references of EPSS to Protective Equipment and Device Settings. This refers to the increased sensitivity in settings for fault-sensing devices on the electric distribution grid, such as a circuit breaker and/or a line recloser, that causes the line segment to automatically de-energize when contacted by a foreign object such as a tree limb that could otherwise potentially lead to an ignition.

WSAB Recommendation	Energy Safety Recommendation	Analysis
<p>outages relating to Protective Equipment and Device Settings and PSPS. This notification may occur, for example, via an outage app unique to the HFTD areas and communities. Additionally, the utilities should each create a readily available website with information pared down to be easily understood yet informative enough to the customer and stakeholders, to assist in their response to elevated wildfire risk in HFTD areas.</p>	<p>in the 2026-2028 WMP Guidelines.</p>	<ul style="list-style-type: none"> • With respect to the recommendation that the utilities create a readily available website providing information on wildfire risk in the HFTD, it is outside the scope of Energy Safety's authority to mandate prescriptive requirements regarding the electrical corporation's communication platforms.

3 EVALUATION OF THE WSAB'S RECOMMENDATIONS FOR THE SAFETY CULTURE ASSESSMENT PROCESS

The tables below present the WSAB's recommendations for the safety culture assessment (SCA) process 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.

The SCA process is pending revision at this time. As such, Energy Safety is refraining from incorporating any WSAB recommendations into the 2024 SCA process. Where Energy Safety agrees with a WSAB recommendation, Energy Safety will consider it further and potentially integrate it into future iterations of the SCA process.

Table 3-1: Energy Safety’s Evaluation of the WSAB’s Recommendations for the SCA Process

WSAB Recommendation	Energy Safety Recommendation	Analysis
<p>1 – Workforce Survey Addition (Alerting decisionmakers about safety hazards) In the workforce survey, Energy Safety should consider adding a question regarding employees’ confidence of the ability to quickly alert decisionmakers and management about issues/safety hazards when detected.</p>	<p>Already incorporated.</p>	<p>This recommendation is already covered in nine other safety-related questions within the existing and 2024 SCA workforce survey.⁸</p>
<p>2 – Workforce Survey Addition (Independent decisions) Energy Safety should add a statement to the workforce survey such as the following: “I am empowered to make independent decisions concerning safety</p>	<p>Already incorporated.</p>	<p>This recommendation is already covered in eleven other personal safety questions within the existing and 2024 SCA workforce survey.⁹</p>

⁸ The nine referenced wildfire safety questions on the workforce survey: (1) My workgroup consistently follows procedures to control workplace hazards in our work areas (including procedures specific to wildfire hazards); (2) I feel comfortable discussing wildfire hazards with my supervisor; (3) Wildfire and personal safety concerns are communicated openly; (4) Protecting the community from wildfire hazards is clearly a high priority with management; (5) People look for wildfire hazards and risks as work progresses; (6) People in my work group report all wildfire hazards, no matter how minor; (7) Our management acts quickly to address wildfire hazards; (8) Leaders actively seek out signs of potential wildfire hazards; and (9) I am regularly asked for my ideas and suggestions about wildfire hazards and ways to address them.

⁹ The eleven referenced personal safety questions on the workforce survey: (1) I take responsibility for the safety of myself and others in my work area; (2) If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor; (3) Pausing work for hazards and safety concerns is viewed positively; (4) I stop people, even those I do not know, to point out unsafe behavior when I see it in the work environment; (5) Accidents and incidents are investigated completely to find out what happened and the corrective actions needed; (6) People have the skills they need to resolve workplace safety issues; (7) Leaders use mistakes and incidents as learning opportunities; (8) Leaders keep people prepared to intervene when an emergency occurs; (9) People have the ability to respond to and correct problems and errors before they get out of control; (10) We have the right tools for the job; and (11) People focus on one task at a time and avoid distractions.

WSAB Recommendation	Energy Safety Recommendation	Analysis
<p>in the absence of decisionmakers or my management, if needed[.]”</p>		
<p>3 – Workforce Survey Addition (Reporting false alarms) In the workforce survey, Energy Safety should consider adding a question about whether workers are comfortable reporting issues, even if they turn out to be false alarms, without fear of retaliation.</p>	<p>Already incorporated.</p>	<p>This recommendation is already covered in two other questions within the existing and 2024 SCA workforce survey.¹⁰ In the future Energy Safety will consider adding to the workforce survey an explicit statement regarding reporting false alarms.</p>
<p>4 – Workforce Survey Addition (Pointing out managerial behavior) Energy Safety should consider adding a question/statement to the workforce survey about the degree that workers feel safe and empowered to point out issues with their managers not following protocols directly or pressuring employees to do so.</p>	<p>Potentially incorporate in the future.</p>	<p>This recommendation pertaining to reporting bad or unsafe behavior by managers is not covered by the current workforce survey. Energy Safety will keep this recommendation in mind during future revisions of the SCA process.</p>
<p>5 – Workforce Survey Addition (Communication with other work teams/contractors)</p>	<p>Potentially incorporate in the future.</p>	<p>This recommendation pertaining to communication between work units or between employees and contractors is not</p>

¹⁰ The two referenced reporting questions on the workforce survey: (1) If I stopped a job because an important safety step was missing, it would be viewed positively by my supervisor; and (2) Pausing work for hazards and safety concerns is viewed positively.

WSAB Recommendation	Energy Safety Recommendation	Analysis
<p>Energy Safety should also add a statement to the workforce survey similar to the following: “We have regular/open channels of communication with other teams and/or contractors that are responsible for wildfire mitigation work.”</p>		<p>covered by the current workforce survey. Energy Safety will keep this recommendation in mind during future revisions of the SCA process.</p>
<p>6 – Management Self-Assessment Addition (Safety matter coordination)</p> <p>Energy Safety should include the following question in the management self-assessment: “To what extent do you coordinate on safety matters with communication providers who you share pole space with, or who attach their equipment to the same poles?”</p>	<p>Potentially incorporate in the future.</p>	<p>This recommendation pertaining to coordinating safety matters in the management self-assessment is not covered by the current management self-assessment. Energy Safety will keep this recommendation in mind during future revisions of the SCA process.</p>
<p>7 – Partnering with External Safety Experts</p> <p>Energy Safety should consider partnering with safety experts from the Occupational Safety and Health Administration (OSHA), California’s Division of Occupational Safety and Health (Cal/OSHA), or independent monitors that could meet with and/or sporadically observe utility and contractor crews[.]</p>	<p>Do not incorporate.</p>	<p>Energy Safety and OSHA and Cal/OSHA have different goals. Energy Safety aims to assess an organization’s capacity for institutional learning to improve overall safety culture over time. OSHA and Cal/OSHA aim to mitigate instances of workplace hazards, prescribe methods to protect employees from hazards, and investigate violations or accidents resulting in serious injury, illness, or death. Energy Safety’s SCA process would not benefit from this recommendation at this time. As for partnering with independent</p>

WSAB Recommendation	Energy Safety Recommendation	Analysis
		monitors, Energy Safety will discuss this recommendation further with the WSAB and keep this recommendation in mind during future revisions of the SCA process.
<p>8 – Management Self-Assessment Addition (Cross-Utility safety information sharing)</p> <p>The management self-assessment should include a question about the degree to which the utility shares information with other utilities and partner agencies about their safety programs and initiatives to address safety culture as part of sharing best practices. This should include metrics that examine how successful their efforts are in addressing areas of concerns.</p>	<p>Potentially incorporate in the future.</p>	<p>Energy Safety will consider the extent the electrical corporations share information on safety programs and keep this recommendation in mind during future revisions of the SCA process.</p>

4 CONCLUSION

This document contains Energy Safety's analysis and recommendations associated with the WSAB's Recommendations Report. Energy Safety submitted its analysis and recommendation to the CPUC on July 31, 2023, pursuant to Public Utilities Code section 8389(c).

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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