

April 24, 2024

Shannon O'Rourke
Deputy Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street 20th Floor
Sacramento, CA 95814

E-filed with Docket #2023-SCAs

SUBJECT: Southern California Edison Company's (SCE) Agreement to Implement the Findings (Including Recommendations) of the 2023 Safety Culture Assessment Report

Deputy Director O'Rourke:

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 March 22, 2024, enclosing SCE's 2023 Safety Culture Assessment Report (SCA Report), states that SCE may do so "by submitting a letter to this effect [to] the 2023 Safety Culture Assessments docket."

National Safety Council (NSC), a consultant retained by the Office of Energy Infrastructure Safety (Energy Safety), conducted the 2023 SCA for SCE between June and July, 2023. On February 23, 2024, Energy Safety released the draft 2023 SCA Report to SCE for comment. Pursuant to the guidance from Energy Safety, SCE submitted comments on March 8, 2024. On March 22, 2024, Energy Safety issued the SCA Report attaching SCE's comments to the draft report.¹ The recommendations by Energy Safety on SCE's 2023 SCA and SCE's response to these recommendations are described below.

The report states that SCE "has exhibited continued growth in safety culture maturity since 2021,"² that "focus group participants described SCE as an organization with

¹ 2023 Safety Culture Assessment Report for SCE, available at: [2023 SCA for SCE](#)

² SCA Report, p. 3.

opportunities to improve but moving in the right direction,”³ and that “inputs indicated that SCE is succeeding in integrating contractors into SCE’s safety culture.”⁴ The report makes five recommendations to drive consistent improvements in SCE’s safety culture.⁵

1. Continue to Build SCE’s Capacity as a Learning Organization (Recommendation 3.1): SCE should build its capacity as a learning organization. It should take a proactive approach to incorporating feedback to improve organizational processes. It should also take steps to increase workers’ psychological safety to improve the quantity and quality of safety event (near-miss and hazard) reports, by:

- Focus on improving safety-enabling systems such as the investigation and root cause analysis of incidents.
- Offer more opportunities for frontline workers and contractors to discuss lessons learned from safety events (near-misses and hazards) to foster psychological safety (i.e., a sense of safety that allows workers to feel empowered to speak up).
- Measure frontline leaders’ progress on implementing training concepts such as coaching conversations to provide accountability and allow SCE to evaluate its improvement through learning and refine actions as needed.
- Develop and implement a plan to increase the quantity and quality of safety event (near-miss and hazard) reports submitted by frontline employees. The effectiveness of an event investigation depends on the quality of the information reported about the event.

2. Strengthen Safety Communications Between Leadership and Frontline Workers (Recommendation 3.2): SCE should continue efforts to improve safety communications between leadership and frontline workers, by:

- Consider deploying an incident management team liaison to the field during incidents to be a part of monitoring and service restoration to better understand the frontline workers’ experiences.
- Continue to implement measures to increase organizational learning through regular cross-departmental topic-specific safety listening sessions.

³ *Id.*

⁴ *Id.*

⁵ *Id.*, p. 4.

3. Improve Training for Frontline Workers on Wildfire Suppression and Mitigation Technology (Recommendation 3.3): SCE should increase training for frontline workers on wildfire suppression and the installation and operation of new technologies related to wildfire mitigation, including rapid earth fault current limiter (REFCL) devices, by:
 - Continue to improve its training for frontline workers, particularly concerning wildfire suppression and the installation and operation of new technologies related to wildfire mitigation (e.g., rapid earth fault current limiter [REFCL] devices).
 - Increase training options to include more hands-on and less computer-based delivery.

4. Mitigate Risk Exposure Posed by Interactions with the Public (Recommendation 3.4): SCE should continue to recognize and take action to mitigate the risk exposure posed by interactions with the public by:
 - Continue to recognize and take action to mitigate the risk exposure posed by interactions with the public.
 - Continue to track these incidents and further strengthen its strategy for managing risk exposure posed by interactions with the public.

5. Increase Engagement in Workforce Survey (Recommendation 3.5): SCE should increase engagement on the safety culture assessment within the workforce supporting wildfire mitigation initiatives, by:
 - Must employ a more robust communication strategy that involves senior leadership to promote the survey.
 - Must consider ways to diversify the tactics for soliciting survey responses from the workforce.

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.

Sincerely,

//s//

Michael Backstrom

Vice President, Regulatory Affairs

Southern California Edison

CC: