

Vince Tanguay
Senior Director

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August 26, 2024

Via Office of Energy Infrastructure Safety E-Filing

Patrick Doherty
Program Manager, Compliance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Re: Pacific Gas and Electric, San Diego Gas & Electric, and Southern California Edison
Joint Comments on Office of Energy Infrastructure Safety's Second Proposed
Compliance Guidelines 2024 Update
Docket: *Electrical Compliance Enforcement / Compliance Guidelines*

Dear Program Manager Doherty:

Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (Joint IOUs) provide the following joint comments addressing the second Proposed Compliance Guidelines Draft 2024 Update ("Second Draft Guidelines") issued by the Office of Energy Infrastructure Safety ("Energy Safety") on July 26, 2024.

I. COMMENTS

The Second Draft Guidelines propose two changes to the previous draft guidelines that were issued on June 5, 2024 ("First Draft Guidelines"): (1) clarifying the reference to the construction standards in Section 5.0; and (2) revising the deadline for executing a contract with an independent evaluator in Section 7.0.¹

The Joint IOUs support both revisions and appreciate Energy Safety improving the First Draft Guidelines in these areas. While these two changes are helpful, the Second Draft Guidelines did not incorporate other important comments previously raised by the Joint IOUs. The Joint IOUs respectfully ask Energy Safety to also consider further revising the Second Draft Guidelines to consider the proposals raised by the Joint IOUs in their July 5, 2024 comments on the First Draft Guidelines.² Additional revisions to the Second Draft Guidelines to address the issues raised by the Joint IOUs, or a response that provides context on why additional changes were not made, would help

¹ See [Energy Safety Second Draft Guidelines](#) (Jul. 26, 2024) at 6 and 10, respectively.

² See [Joint IOU Comments on Energy Safety Proposed Compliance Guidelines 2024 Update](#) (Jul. 5, 2024).

the Joint IOUs and other external parties better understand Energy Safety's position and considerations for future opportunities to comment on draft guidelines and related documents.

II. CONCLUSION

The IOUs appreciate the opportunity to provide these comments and look forward to further discussion and engagement. Should you have any questions or concerns, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Vince Tanguay". The signature is fluid and cursive, with the first name "Vince" written in a larger, more prominent script than the last name "Tanguay".

Vince Tanguay
Sr. Director, Regulatory Compliance, Electric Engineering, Planning, and Strategy