

December 2, 2024

VIA ELECTRONIC FILING

Suzie Rose
Program Manager, Electrical Safety Policy Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Re: **Joint Utilities' Comments on Draft 2024 Safety Culture Assessment Guidelines**

Dear Ms. Rose:

Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric (SDG&E), and Southern California Edison (SCE) (collectively, the Joint Utilities) respectfully submit these comments on the Office of Energy Infrastructure Safety's (Energy Safety) Draft 2024 Safety Culture Assessment Guidelines (Draft Guidelines), issued on November 8, 2024.

I. THE JOINT UTILITIES RECOMMEND STANDARDIZING THE TIMING OF THE SAFETY CULTURE ASSESSMENT PROCESS

The Joint Utilities believe the best way to maximize the safety culture assessment (SCA) process would be to create and adhere to a defined and consistent schedule from year-to-year. A consistent schedule with significant notice will allow all parties appropriate planning time to ensure resources are available to complete the assessment. The Joint Utilities are concerned about the timing of the upcoming final SCA guidelines and note that there will be conflicts with multiple deliverables required for submission in the first quarter of 2025. These deliverables include the Fourth Quarter/year-end Quarterly Data Report, Annual Report on Compliance, and the 2026 – 2028 Base Wildfire Mitigation Plan. For that reason, the Joint Utilities encourage Energy Safety to develop a timeframe and schedule that allows sufficient time to conduct a thorough safety culture assessment. To this end, the Joint Utilities propose that Energy Safety utilize a timeline like the one proposed in 2021, which is described below:

Proposed Schedule for Future SCAs

- Late May: SCA kickoff;
- Late May to late June: Management self-assessment;
- Mid-June to late June: Workforce survey and planning for workforce focus groups;

- Late June to mid-July: Management interviews and public workshop;
- Early July to late July: Focus groups;
- September: Final SCA report.

The proposed timeline begins the SCA process in May, which will allow for sufficient time for interviews to be conducted in the summer and avoid the administration of surveys during the peak summer and fall wildfire season.

Furthermore, the Joint Utilities emphasize that the survey planning discussed in Section 2.2 of the Guidelines between Energy Safety, the electrical corporation, and the third-party administrator is a critical component to ensure success in administering the workforce survey and encourages Energy Safety to carefully consider a thoughtful and thorough planning meeting. The Joint Utilities have found that the planning time is crucial for adequate preparation amongst all parties and to anticipate and remediate potential challenges. The Joint Utilities believe that a schedule that provides for sufficient planning time will result in increased participation in the workforce survey.

II. THE JOINT UTILITIES RECOMMEND COORDINATING THE ENERGY SAFETY SCA WITH OTHER REGULATORY SAFETY CULTURE EFFORTS

The Joint Utilities also believe that the SCA process could be further improved by aligning the SCA with other regulatory safety culture assessment initiatives, namely the California Public Utilities Commission (CPUC) Safety Culture Assessment Rulemaking proceeding, R.21-10-001. Alignment of these two initiatives would be achieved by specifying topics that each process will address and the timing for each initiative in order to avoid duplication of efforts and skewed results. Coordination between the respective safety culture assessments would have the benefits of: (1) conserving resources, (2) reducing the potential for confusion, overlapping efforts, redundancy, and survey fatigue, which could hinder survey participation; and (3) providing the most accurate results for all involved parties. While the CPUC works to develop and adopt a comprehensive safety culture assessment framework, the Joint Utilities recommend Energy Safety continue to identify means to target and address wildfire safety efforts through its own separate and distinct survey. Two distinct processes will reduce the potential for confusion and conflicting or duplicative regulatory recommendations. However, after a comprehensive safety culture assessment framework is adopted by the CPUC in R.21-10-001, the Joint Utilities recommend Energy Safety integrate its wildfire safety culture assessment process within the CPUC's broader comprehensive safety culture framework for the reasons described above.

III. THE JOINT UTILITIES REQUEST CLARIFICATION ON DUPLICATED MANAGEMENT SELF-ASSESSMENT QUESTIONS

The Joint Utilities note that Questions 2.1.3 and 2.2.3 in the management self-assessment are duplicative and request clarification as to whether this is intentional. If so, the Joint Utilities request clarification as to whether the questions should be distinguished by the dimensions, Senior Leadership Safety Accountability and Metrics and Targets, respectively.

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The Joint Utilities appreciate the opportunity to comment on the draft Guidelines. Should Energy Safety have any questions or concerns, please do not hesitate to contact PG&E at wade.greenacre@pge.com, SDG&E at kkloberdanz@sdge.com, or SCE at jennifer.kline@sce.com.

Very truly yours,

/s/ Matt Hayes

Dr. Matt Hayes