

December 12, 2024

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

Re: California Association of Small and Multi-Jurisdictional Utilities – Draft SCA Guidelines  
Reply Comments

Bear Valley Electric Service, Inc., Liberty Utilities (CalPeco Electric) LLC, and  
PacifiCorp, d.b.a. Pacific Power (collectively, the California Association of Small and Multi-  
Jurisdictional Utilities (“CASMU”)), 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. CASMU Supports the Joint Utilities’ Recommendation to Standardize the Safety  
Culture Assessment Process Timing.**

CASMU supports the recommendations of Pacific Gas and Electric Company (“PG&E”),  
San Diego Gas & Electric Company (“SDG&E”), and Southern California Edison (“SCE”)  
(collectively the “Joint Utilities”) to create a consistent schedule for the safety culture assessment  
(“SCA”) that runs from late-May to September.<sup>1</sup> The CASMU members share similar concerns  
about the timing of the upcoming final SCA guidelines given the numerous deliverables that  
must be submitted to Energy Safety in the first quarter of 2025. In addition, CASMU members

---

<sup>1</sup> Joint Utilities’ Comments on Draft 2024 Safety Culture Assessment Guidelines, pp. 1–2 (filed  
December 2, 2024).

must use the first quarter of 2025 to prepare for the upcoming 2026–2028 Base Wildfire Mitigation Plan. The Joint Utilities’ proposed late-May to September SCA timeline allows all utilities, including the CASMU members, to administer workforce surveys outside of the peak summer and fall wildfire season when employees and contractors are busiest. Like the Joint Utilities, CASMU believes that successfully administering the SCA process requires a schedule that accommodates thoughtful and comprehensive survey planning meetings between Energy Safety, each electrical corporation, and a third-party survey administrator.<sup>2</sup> For these reasons, CASMU encourages Energy Safety to adopt the Joint Utilities’ proposed SCA process timeline.

## **II. CASMU Supports the Joint Utilities’ Recommendation to Integrate Energy Safety’s Safety Culture Assessment Within the Commission’s Broader Safety Culture Assessment Framework.**

CASMU supports the Joint Utilities’ recommendation to integrate Energy Safety’s SCA within the California Public Utilities Commission’s (“Commission”) broader safety culture assessment framework when it is created and finalized in the Safety Culture Assessment Rulemaking proceeding, R.21-10-001.<sup>3</sup> As the Joint Utilities appropriately recognize, two distinct processes may reduce workforce survey participation and result in conflicting or duplicative regulatory recommendations. CASMU supports Energy Safety’s continued efforts to identify wildfire safety best practices and procedures through its SCA process. However, Energy Safety’s SCA process should be incorporated into the broader safety culture framework that the Commission will adopt in R.21-10-001 to conserve resources, reduce factors that hinder survey participation, and provide more comprehensive results for all parties.

---

<sup>2</sup> *Id.*, p. 2.

<sup>3</sup> See Order Instituting Rulemaking to Develop Safety Culture Assessments for Electric and Natural Gas Utilities (filed October 7, 2021).

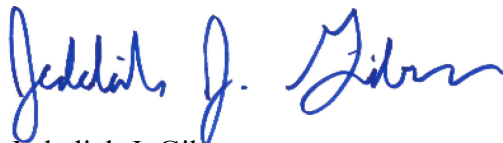
### III. Conclusion

CASMU appreciates this opportunity to provide comments on the Draft Guidelines and looks forward to working with Energy Safety to refine and improve the SCA framework.

CASMU supports the Joint Utilities' recommendations to standardize the timing of the SCA process and to incorporate the SCA within a broader safety culture assessment framework that the Commission will adopt in R.21-10-001. The Joint Utilities' recommendations will reduce administrative burdens, improve the utilities' ability to administer the SCA, and produce better workforce survey results for all parties.

Respectfully Submitted,

DOWNEY BRAND LLP



Jedediah J. Gibson

JJG

4519596.4