

PUBLIC UTILITIES COMMISSION

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Via Electronic Filing

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**Subject: Comments of the Public Advocates Office on the Safety
 Certification Request of SCE Case No. 2021-SC**

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments on the Safety Certification Request of Southern California Edison Company (SCE) filed on September 13, 2021. Cal Advocates submits these comments on SCE's Safety Certification Request pursuant to Public Utilities Code § 8389(e)-(f), and in accordance with the further guidance in the Office of Energy Infrastructure Safety's (OEIS or Energy Safety)¹ September 14, 2021 letter.² We respectfully urge Energy Safety to adopt the recommendations discussed herein.

I. INTRODUCTION

Receiving a safety certification is one of the requirements an electric utility must fulfill to recover catastrophic wildfire costs from the Wildfire Insurance Fund. Public Utilities Code § 8389(e) authorizes Energy Safety to issue a safety certification to electric utilities if they have an approved wildfire mitigation plan, agree to implement the recommendations of a

¹ On July 1, 2021, the Wildfire Safety Division of the California Public Utilities Commission moved to the California Natural Resources Agency and became the Office of Energy Infrastructure Safety pursuant to Assembly Bill 111, which was signed by the Governor on July 12, 2019 (Chapter 81, Statutes of 2019).

² *Public Comment Period for Safety Certification Requests of SCE and SCE*, Office of Energy Infrastructure Safety, September 14, 2021.

Safety Culture Assessment, and meet other requirements detailed in subparagraph (e) of § 8389.

While SCE's certification request may satisfy the requirements for receiving a safety certificate, Cal Advocates makes the following recommendations:

- Energy Safety should require SCE to provide more detail regarding how it intends to implement the Safety Culture Assessment (SCA) recommendations.
- Energy Safety should consider an electrical corporation's history of implementing SCA recommendations over the last year, as part of the Public Utilities Code § 8389(e)(2) good standing requirement.

II. RECOMMENDATIONS

A. Energy Safety should require SCE to provide more detail in how it intends to implement the SCA recommendations.

SCE's agreement to implement the findings of its SCA includes only one sentence that discusses implementing the SCA findings:

By this letter, SCE agrees to implement all of the findings and recommendations for improvement in the SCA report, thereby meeting the "good standing" requirement of Section 8389(e)(2).³

DEKRA, the consultant that conducted the SCA, recommended that SCE:

1. Update current safety leader activities to address issues noted by the workforce concerning wildfire communication, roles, and decisions.
2. Use Safety Culture Pulse Surveys to evaluate progress of supervisors in engaging frontline workers on wildfire hazards and providing clear communication about wildfire-related procedures.
3. Embed learning organization concepts into the culture via training, incident investigations and corrective action systems.
4. Recognize and take action to mitigate the serious exposure posed by interactions with certain discontented members of the public.⁴

³ *Southern California Edison Company's Agreement to Implement the Findings (Including Recommendations) of the 2021 Safety Culture Assessment Report*, p. 2.

⁴ *Safety Culture Assessment, Southern California Edison Company, September 2021*, pp. 1-2.

SCE's one sentence statement provides insufficient detail on how it intends to follow the recommendations of the SCA. This insufficiency especially applies to the issues DEKRA identified in the SCA that directly relate to the execution of Public Safety Power Shutoff (PSPS) events.

DEKRA noted in its SCA that there were disconnects between the frontline workers and the leadership responsible for initiating PSPS events. Specifically, one frontline worker "was concerned that SCE leadership was not taking the field reports seriously when making decisions about shutting off power to prevent wildfire."⁵ DEKRA states that there are indications "that frontline workers don't feel their opinions are valued or that they are provided with the context for decisions."⁶

DEKRA's assessment stands in contrast to the statements given by SCE about the use of field observers prior to and during PSPS events. Specifically, SCE claims that these observers "provide a valuable source of general situational awareness for any local conditions or considerations that should be relayed back to SCE's Incident Management Team."⁷ In addition SCE states that its local subject matter expert's knowledge "can sometimes provide valuable insight beyond SCE's circuit switching playbook and can lead to opportunities to reduce customers and circuits impacted."⁸ On one hand, SCE brings up the value of subject matter expert knowledge and of the frontline workers in providing local, real-time guidance on whether or not to initiate PSPS. On the other hand, DEKRA notes that frontline workers feel undervalued and disconnected from PSPS decision-making. That this disconnect may persist into June 2021 is not surprising. SCE has admitted that it does not track the "not an uncommon occurrence" of when a frontline worker recommends against de-energization.⁹

Furthermore, the DEKRA SCA points to inconsistencies in SCE's execution of PSPS events. Some interviewees stated that different shift rotations of the Incident Management Teams (IMT) have used different PSPS decision-making criteria or made different decisions from other rotations while allegedly using the same information inputs as those other rotations.¹⁰ Again this contrasts sharply with SCE's claims that non-modifiable inputs and processes are used to determine when PSPS events are necessary.¹¹ SCE has stated that it does not modify

⁵ *Safety Culture Assessment, Southern California Edison Company, September 2021*, p. 12.

⁶ *Safety Culture Assessment, Southern California Edison Company, September 2021*, p. 13.

⁷ SCE Response to CalAdvocates-SCE-2021WMP-09, Question 010.

⁸ SCE Response to CalAdvocates-SCE-2021WMP-09, Question 011.

⁹ SCE Response to CalAdvocates-SCE-2021WMP-09, Question 012.

¹⁰ *Safety Culture Assessment, Southern California Edison Company, September 2021*, p. 15.

¹¹ SCE 2021 WMP Update Revision – CLEAN, pp. 349-350.

triggers in a particular event.¹² It is disconcerting that there may be an inconsistency in SCE's evaluation of the need to implement PSPS events. These PSPS-related issues can seriously affect customers' and the public's safety and health in the immediate future and warrant an upfront and detailed explanation from SCE on how it intends to follow the SCA recommendations so customers are not unnecessarily harmed.

While SCE's agreement to implement DEKRA's SCA findings can satisfy the "good standing" requirement in Public Utilities Code §8389(e)(2),¹³ SCE provides no details about how it plans to follow the recommendations of the SCA. As a result, there is no measure by which Energy Safety or intervenors can gauge the feasibility of SCE's expectations or determine SCE's progress in addressing the recommendations during the quarter in which they are supposed to satisfy those recommendations. While Public Utilities Code § 8389(e)(7) does require that the electrical corporations file quarterly Tier 1 advice letters that detail the implementation of the SCA recommendations, these backward-looking advice letter filings will be submitted too late for Energy Safety to give timely instruction to SCE to implement any SCA recommendations missed during the quarter. Cal Advocates requests that Energy Safety direct SCE to attach a detailed plan (that shows how SCE plans to address the SCA recommendations) to its November 1, 2021 Progress Report to Energy Safety.¹⁴

B. Energy Safety should consider an electrical corporation's history of implementing SCA recommendations over the last year, as part of the Public Utilities Code § 8389(e)(2) good standing requirement.

The issues and recommendations listed in the SCA warrant an upfront explanation from SCE on how it intends to follow DEKRA's recommendations rather than a brief agreement to follow DEKRA's recommendations. It is not sufficient for the electrical corporations to annually issue agreements to implement the SCA with no plan on how they will address those recommendations. Public Utilities Code § 8389(e)(2) states that in order to be issued an annual safety certification, an electrical corporation must be in "good standing"; and an electrical corporation's agreement to implement the findings of the most recent SCA is one

¹² SCE Response to CalAdvocates-SCE-2021WMP-09, Question 013.

¹³ Public Utilities Code § 8389(e)(2) states: "The executive director of the commission shall issue a safety certification to an electrical corporation if the electrical corporation provides documentation of the following:...(2) The electrical corporation is in good standing, which can be satisfied by the electrical corporation having agreed to implement the findings of its most recent safety culture assessment, if applicable."

¹⁴ Page 8 of Energy Safety's *Action Statement on 2021 Wildfire Mitigation Plan Update – Southern California Edison* states that Energy Safety "expects SCE to take action to address these key areas and report on progress made over the year in a Progress Report due by 5:00 p.m. on November 1, 2021, and in its 2022 WMP Update."

factor that can satisfy the “good standing” requirement.¹⁵ However, the agreement to implement SCA findings should not be the only factor. Thus, we recommend Energy Safety consider an electrical corporation’s previous history of implementing SCA recommendations over the last year, as part of the Public Utilities Code § 8389(e)(2) good standing requirement.

III. CONCLUSION

Cal Advocates respectfully requests that Energy Safety adopt the recommendations discussed herein. Please contact Program Manager Nathaniel Skinner (Nathaniel.Skinner@cpuc.ca.gov) or Program and Project Supervisor Matthew Karle (Matthew.Karle@cpuc.ca.gov) with any questions relating to these comments.

Sincerely,

/s/ CAROLYN CHEN

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¹⁵ Public Utilities Code § 8389(e)(2).