



Michael Backstrom
Vice President
Regulatory Affairs

Docket #: 2023-SCs

September 12, 2023

Caroline Thomas Jacobs
Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's 2023 Safety Certification Request

Dear Director Thomas Jacobs:

Pursuant to California Public Utilities Code Section¹ 8389(e) and (f), Southern California Edison Company (SCE) submits this 2023 Safety Certification request and supporting documentation. SCE's 2022 safety certification was granted on December 13, 2022 and, pursuant to Section 8389(f)(4), will remain in effect until the Office of Energy Infrastructure Safety (Energy Safety) acts on this request.

Below, SCE describes how it satisfies each of the safety certification requirements set forth in Section 8389(e), consistent with the 2023 Safety Certification Guidelines issued by Energy Safety on June 28, 2023 (Guidance):²

1. **Section 8389(e)(1) – The electrical corporation has an approved wildfire mitigation plan.**

Energy Safety Guidance: In its Safety Certification submission, an electrical corporation must document the date of its most recently approved wildfire mitigation plan (WMP) or WMP Update and the date it was approved by Energy Safety. An electrical corporation is ineligible for a Safety Certification if it received a denial of its most recently submitted WMP or WMP Update.³

¹ Unless otherwise stated, all references to "Section" herein refer to the California Public Utilities Code.

² Office of Energy Infrastructure Safety's Safety Certification Guidelines (hereinafter "Guidance"), June 28 2023, available at [TN12623_20230628T142539_2023_Safety_Certification_Guidelines.pdf](https://www.sce.com/~/media/Files/Regulatory%20Affairs/20230628T142539_2023_Safety_Certification_Guidelines.pdf)

³ Guidance, p. 2.

SCE's 2022 Wildfire Mitigation Plan Update was approved on August 25, 2022. Pursuant to Section 8389 (e)(1), a utility must provide documentation of an approved WMP in order to obtain safety certification. Section 8386.3(a) states that a utility's approved WMP "shall remain in effect" until Energy Safety approves that utility's subsequent plan.

On March 27, 2023, SCE submitted its 2023-2025 WMP.⁴ Energy Safety issued a Draft Decision on August 30, 2023 approving it.⁵ A Final Decision is anticipated in Q4 2023. In the 2023 Guidelines, Energy Safety instructs that:

If an element required for a Safety Certification request is missing at the time of the request (e.g., Energy Safety has not yet issued a decision on the electrical corporation's most recent WMP), an electrical corporation may submit the missing element subsequent to the initial Safety Certification request up until ten days prior to the deadline for Energy Safety's decision on the electrical corporation's Safety Certification request (the deadline being 90 days following the submission date of an electrical corporation's request for Safety Certification). If submitted in a timely fashion, Energy Safety will take such supplemental materials into account in its decision-making process regarding the Safety Certification request.⁶

Thus, we are submitting this request while we await Energy Safety's Final Decision on our 2023 WMP.

2. **Section 8389(e)(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 performed pursuant to Sections 8386.2 and paragraph (4) of subdivision (d), if applicable.**

Energy Safety Guidance: In its Safety Certification submission, an electrical corporation must document its agreement to implement the findings of its most recent safety culture assessment undertaken by Energy Safety or its contractors. If a safety culture assessment has been carried out pursuant to Public Utilities Code section 8386.2, the electrical corporation must also document in its submission an agreement to implement the findings of that safety culture assessment.⁷

SCE's most recent safety culture assessment was conducted by National Safety Council (NSC), an independent consultant retained by Energy Safety, in 2022.

⁴ See Southern California Edison Company's 2023-2025 Wildfire Mitigation Plan, filed March 27, 2023, [TN11952-2 20230327T125844 20230327 SCE 2023 WMP R0.pdf](#)

⁵ Office of Energy Infrastructure Safety Draft Approval of Southern California Edison Company's 2023-2025 Wildfire Mitigation Plan, available at [TN12965 20230830T172845 2023 SCE Draft Decision with cover letter](#)

⁶ Guidance, p. 6.

⁷ Guidance, p. 2.

On April 17, 2023, Energy Safety published a draft report of NCS’s findings and recommendations based on an evaluation of SCE’s safety culture assessment. Energy Safety issued a revised and final 2022 SCA report (SCA report) attaching SCE’s comments to the draft report on May 8, 2023.⁸ The recommendations by Energy Safety on SCE’s 2022 safety culture assessment and SCE’s response to these recommendations are described below.

The report states that “SCE’s 2022 management self-assessment demonstrates an organization that is committed to safety”⁹ and “[f]ocus groups with frontline employees and supervisors revealed positive and optimistic perceptions regarding SCE’s safety culture.”¹⁰ The report makes four recommendations to drive consistent improvements in SCE’s safety culture:¹¹

1. Continue to Build SCE’s Capacity as a Learning Organization (Recommendation 3.1): SCE should build its capacity as a learning organization, taking a proactive approach to incorporating feedback to improve organizational processes, by:
 - Focusing on improving safety-enabling systems such as incident investigation and root cause analysis.
 - Increasing the quality of incident and near-miss reports submitted by frontline workers.
 - Increasing opportunities for frontline workers and contractors to discuss lessons learned from safety events.
 - Developing an action plan to ensure that frontline leaders are implementing training concepts such as coaching conversations.
2. Optimize Safety Communications Between Leadership and Frontline Workers (Recommendation 3.2): SCE should optimize its safety communications between leadership and frontline workers by considering deploying an incident management team liaison to the field during incidents and implementing regular cross-departmental topic-specific listening sessions to develop better understanding of frontline issues and recognize workers’ accomplishments.
3. Mitigate Risk Exposure Posed by Interactions with the Public (Recommendation 3.3): SCE should continue to recognize and take action to mitigate the risk exposure posed by interactions with the public by:
 - Focusing on encouraging frontline workers to report these incidents.

⁸ 2022 Safety Culture Assessment Report for SCE, *available at* [TN12209_20230508T150452_SCE_2022_SCA_Report_with_cover_letter.pdf](#)

⁹ SCA report, p. 3.

¹⁰ Ibid.

¹¹ SCA report, p. 4.

- Continuing to track incidents and further developing its strategy for managing the risk exposure.
 - Improving bilingual support resources for Spanish-speaking vegetation management crews to assist with de-escalation.
4. Improve Training for Frontline Workers on New Technologies Related to Wildfire Mitigation (Recommendation 3.4): SCE should improve its training for frontline workers on new technologies related to wildfire mitigation, in particular rapid earth fault current limiter (REFCL) devices.

SCE agreed to implement all of the findings and recommendations for improvement in the SCA report in its acceptance of the SCA report submitted on June 21, 2023, thereby meeting this requirement.¹² SCE reiterates that commitment for purposes of this safety certification request. SCE is actively implementing these recommendations and provided updates on its progress in its Quarterly Notification letters.¹³

3. **Section 8389(e)(3) - The electrical corporation has established a safety committee of its board of directors composed of members with relevant safety experience.**

Energy Safety Guidance: Public Utilities Code section 8389(e)(3) requires that the electrical corporation's board of directors must have a safety committee comprised of members with appropriate and relevant experience. To ensure that this requirement is satisfied, electrical corporations must include the following in their Safety Certification requests:

- 1) A resume for each safety committee member that clearly indicates the member's relevant experience.¹⁴

SCE has established a safety committee and each of its members has relevant experience. Information about each safety committee member's relevant experience in Addendum 1.

¹² See Southern California Edison Company's Agreement to Implement the Findings (Including Recommendations) of the 2022 Safety Culture Assessment Report, filed June 21, 2023, *available at* [TN12599 20230621T103544 SCE Acceptance of 2022 Safety Culture Assessment Report.pdf](#)

¹³ See Southern California Edison Company's Quarterly Notification Pursuant to Public Utilities Code Section 8389(e)(7) Regarding the Implementation of Its Approved Wildfire Mitigation Plan and Its Safety Culture Assessment and Safety Recommendations, filed February 1, 2023 (Q4 2022 QNL), *available at* [TN11816 20230203T132637 20230201 SCE2022 Q4QN R0.pdf](#); Southern California Edison Company's Quarterly Notification Pursuant to Public Utilities Code Section 8389(e)(7) Regarding the Implementation of Its Approved Wildfire Mitigation Plan and Its Safety Culture Assessment and Safety Recommendations, filed May 1, 2023 (Q1 2023 QNL), *available at* [TN12188 20230501T140630 20230501 SCE2023 Q1QN R0.pdf](#) and Southern California Edison Company's Quarterly Notification Pursuant to Public Utilities Code Section 8389(e)(7) Regarding the Implementation of Its Approved Wildfire Mitigation Plan and Its Safety Culture Assessment and Safety Recommendations, filed August 1, 2023 (Q2 2023 QNL), *available at* [TN12831 20230801T115059 20230801 SCE2023 Q2QN R0.pdf](#).

¹⁴ Guidance, p. 3.

2) A summary of safety-related education and experience for each safety committee member that is relevant to their role at the electrical corporation.

SCE provides information about each safety committee member's relevant experience in Addendum 1.

3) A description of how the safety committee functions within the company's governance structure and its role with respect to company decision-making and accountability.

SCE's entire Board of Directors is committed to the safety of SCE's workers, its customers, and the community. The Board provides oversight for all aspects of SCE's business, including safety, and various committees of the Board have responsibility for oversight of specific areas. The Safety and Operations Committee of the Board of Directors (Committee) is responsible for oversight of the Company's safety performance, culture, goals, risks, and significant safety-related incidents involving employees, contractors, or members of the public. This oversight includes measures and resources used to prevent, mitigate, or respond to safety-related incidents. The Committee's oversight responsibilities also include SCE's operational practices, resources, risks mitigation plans related to wildfires and emergency response. These duties are outlined in the Committee's charter, which is available on SCE's website at [Misc - SCE SOCharter.pdf - All Documents \(sharepoint.com\)](#). The Committee regularly makes recommendations to management to follow up on specific actions, respond to questions, or address requested topics, as described further in Item 4 below.

The Committee meets at least five times per year and receives reports from SCE management that include safety performance metrics, information on serious injuries and fatalities, and actions to improve worker and public safety. The Chair of the Committee then reports to the entire Board at its next meeting, which is typically held the day after the Committee meeting.

4) A report on significant topics covered by the safety committee since issuance of the last Safety Certification

Significant topics covered by the Committee on wildfire and safety issues include: Wildfire Safety, Worker Safety, and Public Safety, among other topics. In addition to Committee meetings, the Committee Chair meets regularly with SCE management to discuss wildfire and worker safety issues. Additional information about each of the topics discussed at the Committee meetings may be found in SCE's quarterly submissions, specifically the Q4 2022 Quarterly Notification Letter filed with Energy Safety on February 1, 2023, SCE's Q1 2023 Quarterly Notification Letter filed on May 1, 2023, and SCE's Q2 2023 Quarterly Notification Letter filed on August 1, 2023.¹⁵ Per

¹⁵ See SCE's Q4 2022 Quarterly Notification Letter (QNL), Q1 2023 QNL and Q2 2023 QNL.

Section 8389(e)(7),¹⁶ the Quarterly Notification Letter replaces the Quarterly Advice Letter filed with the CPUC. SCE's Q3 2023 Quarterly Notification Letter will be submitted on November 1, 2023.

5) A description of any safety committee recommendations and an indication whether the electrical corporation has implemented these recommendations since issuance of the last Safety Certification. If the safety committee made no recommendations, or the electrical corporation has not implemented all recommendations made by the safety committee, then the electrical corporation must indicate this and provide an explanation.

SCE has included in its Quarterly Notification Letters the descriptions of the recommended actions from the Committee. These quarterly updates also describe how SCE has implemented, or is working to implement, these recommendations. Some of the Committee recommended actions require more than a single calendar quarter to implement. Management continues to work on these longer-term recommended actions and will provide updates at future meetings with the Committee. To date, there have not been any Committee recommended actions that SCE has declined to implement. Additional information about the Committee's recommended actions since the issuance of the last Safety Certification that were implemented by SCE may be found in SCE's Q4 2022 Quarterly Notification Letter filed with Energy Safety on February 1, 2023, SCE's Q1 2023 Quarterly Notification Letter filed on May 1, 2023, and SCE's Q2 2023 Quarterly Notification Letter filed on August 1, 2023.¹⁷

4. **Section 8389(e)(4) & Section 8389(e)(6) - The electrical corporation has established an executive incentive compensation structure that meets the statutory requirements of these code sections and has been approved by Energy Safety.**

Energy Safety Guidance: In their Safety Certification requests, electrical corporations must cite to Energy Safety's decision on its most recent executive compensation structure in its Safety Certification Request.¹⁸

SCE's executive compensation structure meets the requirements of Section 8389(e)(4). SCE provided details of that structure, including its final 2023 annual incentive goals and metrics as

¹⁶ Section 8389(e)(7) states, in part, that "[t]he electrical corporation shall file a notification of implementation of its wildfire mitigation plan with the office and an information-only submittal with the commission on a quarterly basis that details the implementation of both its approved wildfire mitigation plan and recommendations of the most recent safety culture assessments by the commission and office, and a statement of the recommendations of the board of directors' safety committee meetings that occurred during the quarter. The notification and information-only submittal shall also summarize the implementation of the safety committee recommendations from the electrical corporation's previous notification and submission."

¹⁷ See SCE's Q4 2022 QNL, Q1 2023 QNL and Q2 2023 QNL.

¹⁸ Guidance, p. 3.

approved by the SCE Board of Directors' independent Compensation and Executive Personnel Committee (Compensation Committee) in its March 13, 2023 submission to Energy Safety.¹⁹

On August 8, 2023, Energy Safety issued a draft letter of approval of SCE's 2023 executive compensation structure.²⁰ Energy Safety's letter specified that "SCE's submission satisfies the requirements of Public Utilities Code Section 8389(e)(4) and 8389(e)(6) and the 2023 Executive Compensation Structure Submission Guidelines (2023 Guidelines)."^{21, 22}

5. **Section 8389(e)(5) - The electrical corporation has established board-of-director-level reporting to the California Public Utilities Commission (CPUC) and Energy Safety on safety issues. Energy Safety and the CPUC will aim to jointly coordinate at least one public meeting prior to the submission of Safety Certification requests to ensure that electrical corporations meet this requirement in a transparent manner.**

Energy Safety Guidance: For each electrical corporation, a board member, along with the chief safety/risk officer (or equivalent), must brief the CPUC and Energy Safety on safety performance during the public meeting. Details regarding the public meeting, including the agenda of topics to be covered, will be provided in a public notice. Electrical corporations must provide any materials used or referenced in the public meeting in their Safety Certification requests to demonstrate that the electrical corporation has met this requirement.²³

On July 20, 2023, SCE's Chair of the Safety and Operations Committee of the Board of Directors, Timothy O'Toole, along with Steve Powell²⁴ who also serves as SCE Board Chair, Vice President of Enterprise Risk Management & Insurance and General Auditor, David Heller, and Vice President of Safety, Security and Business Resiliency, Andrew Martinez, provided a briefing to the Commission and Energy Safety on SCE's safety performance. The presentation materials used in the public meeting are attached as Addendum 2.

6. **Section 8389(e)(7) - The electrical corporation is implementing its approved wildfire mitigation plan [WMP]...."**

Energy Safety Guidance: The statute requires an electrical corporation to submit a notification of implementation to Energy Safety on a quarterly basis detailing progress

¹⁹ 2023 Executive Compensation Submission of Southern California Edison Pursuant to Assembly Bill 1054, filed March 13, 2023, *available at* [TN11903_20230313T152945_20230313_SCE_2023_ECSS_R0.pdf](#).

²⁰ Office of Energy Infrastructure Safety Draft Approval of Southern California Edison Company's 2023 Executive Compensation Structure Submission (2023 Executive Compensation Draft Approval), *available at* [TN12873_20230808T103656_Draft_SCE_Executive_Compensation_Decision.pdf](#).

²¹ 2023 Executive Compensation Draft Approval, p. 2.

²² On July 28, 2022, Energy Safety approved SCE's 2022 executive compensation structure. *Available at* [TN11271_20220729T152737_Approval_of_SCE's_2022_Executive_Compensation_Structure.pdf](#).

²³ Guidance, p. 3.

²⁴ Steve Powell also is SCE's President and Chief Executive Officer.

on its WMP, the recommendations of its most recent Energy Safety and CPUC safety culture assessment(s) performed pursuant to Public Utilities Code section 8386(d)(4) and section 8386.2, and a statement of the recommendations of the board of directors' safety committee meetings and a description of the implementation of those recommendations.

In 2023, SCE is tracking to 40 specific wildfire-related activities, including grid hardening, enhanced inspection and repair programs, continuation of robust vegetation management, increased situational awareness and response, and augmented activities for Public Safety Power Shutoff (PSPS) resilience and community engagement, particularly for underrepresented groups and access and functional needs customers. SCE is on track to substantially meet the 2023 year-end targets set forth in its WMP. As of June 30, five of the 40 activities have been completed. SCE stated in the Q2 Quarterly Notification that thirteen activities are behind plan due to several factors largely outside of SCE's control, including severe weather in Q1, material shortages, work management tool stabilization, and resource availability. SCE has implemented measures to address the delays and expects to meet year-end targets for these activities and to streamline execution in the future. As noted in the Q2 Quarterly Notification: "One of these activities, SH-2, though currently on-track relative to internal construction plans, has ongoing permitting and environmental constraints that will challenge our ability to achieve the year-end target. SCE is currently actively working with the impacted agencies to expedite work release for construction." The information in this paragraph regarding activity status is current as of the date the Q2 Quarterly Notification submitted on August 1, 2023 was finalized. SCE forecasts at least some of these 13 activities will be back to plan by the end of the third quarter of 2023. SCE will provide further updates on its progress implementing these activities in its Q3 Quarterly Notification on November 1, 2023.

Quarterly notifications as required by Section 8389(e)(7)

In its quarterly notification letters, SCE presented detailed information about how it has made meaningful progress towards meeting its 2022 WMP Update Program Targets for each of the 40 wildfire-related mitigation activities and programs; implemented actions to address the four findings and recommendations identified in the 2022 SCA report; and included descriptions of the recommended actions from the Safety and Operations Committee meetings. SCE timely submitted its Q4 2022 Quarterly Notification Letter filed with Energy Safety on February 1, 2023, its Q1 2023 Quarterly Notification Letter on May 1, 2023, and its Q2 2023 Quarterly Notification Letter on August 1, 2023.²⁵

Conclusion

For the foregoing reasons, SCE requests prompt issuance of a safety certification as required by Section 8389. We appreciate the opportunity to continue working with Energy Safety on this

²⁵ Id.

important topic and ask that you contact me or our Managing Director of State Regulatory Operations, Connor Flanigan, should you have any questions regarding this submission.

Sincerely,

//s//

Michael Backstrom

Vice President

Regulatory Affairs

Addendum 1
2023 SCE Safety and
Operations Committee Member
Safety Qualifications

Timothy O'Toole – Safety Qualifications

Timothy O'Toole, the Chair of the Safety and Operations Committee, has extensive safety experience and has been recognized as a safety leader both in the United States and internationally. He is currently a member of the Board of Directors of the National Safety Council, a non-profit chartered by the United States Congress whose mission is to eliminate preventable deaths at work, in homes and communities and on the road through leadership, research, education and advocacy. Mr. O'Toole has decades of direct management in the rail and bus transportation industry where worker and public safety is a paramount concern. He previously served as managing director of the London Underground where he led the response to the 2005 terrorist bombing attacks and for which he was awarded a Commander of the Most Excellent Order of the British Empire (CBE).

Safety-specific Executive Experience:

FirstGroup plc

- Chief Executive Officer and Chief Operating Officer (2010-2018)

FirstGroup plc is one of the leading transport operators in the UK and North America. Mr. O'Toole served in very senior levels of this major transport company where the safety of workers and passengers is paramount. FirstGroup, like SCE, has safety, which they refer to as “zero harm,” as one of their primary goals. FirstGroup also has a similar number of employees to SCE.

London Underground/London Transport Group

- Managing Director (2003-2009)

London Underground/London Transport Group runs the seventh largest metro system in the world. In his executive capacity, Mr. O'Toole oversaw all aspects of the system and their safety goals and programs that covered both employee and customer safety.

Consolidated Rail Corporation

- President and Chief Executive Officer (1998-2001)

Mr. O'Toole spent over twenty years in a range of senior executive positions at Consolidated Rail Corporation, a U.S. rail service provider, culminating as the President and CEO. Mr. O'Toole oversaw and advised on safety programs during his long tenure at Consolidated Rail.

Safety-specific Board of Directors Experience:

- **National Safety Council** (2017-present)

The National Safety Council is a non-profit chartered by the United States Congress whose mission is to eliminate preventable deaths at work, in homes and communities and on the road through leadership, research, education and advocacy.

- **Cubic Corporation** (2018-present)

Cubic's mission is to make traveling safer and more efficient while helping to reduce the carbon footprint and provide the U.S. and its allies the tools and technology to enable a safer world through its businesses.

Other Current and Past Board of Director Experience

- **FirstGroup plc** (2009-2018) – served on Board of while CEO.

FirstGroup is one of the leading transport operator in the UK and North America

- **CSX Corporation** (2008-2017)

CSX Corp is a leading supplier of rail-based freight transportation in North America. During Mr. O'Toole's tenure as an Independent Director on the CSX Corp Board, he oversaw safety programs and goals for this company, which is comparable in size and safety-intensive industry to SCE.

- **Rail Delivery Group Ltd.** (2011-2013)

Served as Chairman of the British rail industry membership body that brings together passenger and freight rail companies to formulate policy, including safety policies, and undertake communications on behalf of the entire rail industry.

Jeanne Beliveau-Dunn – Safety Qualifications

Jeanne Beliveau-Dunn, a former senior executive at Cisco, has more than 30 years of experience as a technology executive and is a transformational leader with experience in building and managing large-scale infrastructure, cybersecurity, compute, cloud, networking, services and marketing operations, personnel management, and employee and leadership development. During her career, she built effective networking, digital and security solutions, including strategies for Internet of Things (IoT) in smart cities and industrial and energy markets. Her experience managing a large workforce, building network operations and security teams, and building infrastructure and efficiency through technology and process is valuable to the Board's and Safety and Operations Committee's oversight of cyber threats facing the Company. She is also experienced in Environmental, Social and Governance (ESG) matters, compensation, financial review, acquisitions, and risk and resiliency management, and is a National Association of Corporate Directors fellow. As a California resident, Ms. Beliveau-Dunn also provides the perspective of a utility customer impacted by California's wildfires and regulatory environment.

Safety-specific Executive Experience:

Cisco Systems, Inc.

- Vice President and General Manager, Cisco Services (2007-2018)

Ms. Beliveau-Dunn spent over twenty years in a range of senior executive positions at Cisco Systems, a leading technology provider whose purpose is to power an inclusive future for all by helping their customers reimagine their applications, power hybrid work, secure their enterprise, transform their infrastructure, and meet their sustainability goals. Safety is a high priority at Cisco, where they promote their safety culture and provide assurance to their customers and partners that Cisco's products and services are delivered in a safe manner. During her tenure at Cisco, her responsibilities included overseeing and managing a large workforce and ensuring their employee safety goals were met. She also gained experience in cyber security.

Other Current and Past Executive Experience:

Claridad, LLC

- President (2018-present)

Claridad is a consulting, software, and investment company that provides insight, clarity, and direction for companies that need to leverage technology into their business strategy and maximize their competitive advantage.

IoT Talent Consortium

- Founder and Special Advisor (2016-present)

IoT Talent Consortium is a non-profit dedicated to building the next generation of digital success through best practice sharing, designing innovation to corporate culture and building new skills.

Micronics Computers

- Vice President/General Manager (1990-1995)

Micronics Computers (1986 to 1998) manufactured complete systems, motherboards, and peripherals. In 1998, Micronics was acquired by Diamond Multimedia.\

Safety-specific Board of Directors Experience:

- **ZEVx** (2022-present)

ZEVx is an electric vehicle company that produces battery electric power systems and data intelligence for e-mobility applications. As a transportation equipment manufacturer, the company has safety goals/programs that their Board Directors oversee and advise on.

- **Xylem, Inc.** (2017 – present)

As a smart water solutions company, Xylem is a leading global water technology company committed to solving the world's critical water, wastewater, and water-related challenges through technology, innovation, and expertise. The company has a workforce of more than 22,000 diverse employees and employee health and safety is one its core values. As a member of the Board of Directors, Ms. Beliveau-Dunn has overseen the measures the company has taken to improve its safety culture and move towards its employee and contractor safety goals.

- **Columbus McKinnon Corp.** (2020-present)

CMC Corp is an intelligent movement company, whose first of six values is to “connect safety to everything you do.” In her role as director, Ms. Beliveau-Dunn has overseen the corporate measures taken to meet this safety goal.

Other Current and Past Board of Director Experience

- **Crewdle** (2022-present)

Crewdle is a Canadian web 3 company that provides serverless, sustainable peer to peer communication systems.

- **Descartes Lab** (2021-present)

As a geospatial intelligence company, Descartes Labs helps organizations benefit from the scientific analysis of observable, physical world events.

- **National Association of Corporate Directors** (2019-present)

- **New York Academy of Sciences Advisory Board** (2014-2018)

- **Arizona State University Advisory Board** (2014-2018)

- **Technical Services Industry Association Advisory Board** (2014-2018)

Marcy Reed – Safety Qualifications

Marcy Reed, the former President of National Grid Massachusetts, provides extensive utility operations experience as noted below. During her tenure, National Grid received awards from the Edison Electric Institute for safe operations during major weather events such as hurricanes and storms. She chaired the National Grid Massachusetts Gas & Electric Operational Safety Committee, including the oversight and inclusion of the Labor/Management Safety Committee discussions and results. She also directed strategic energy policy development at National Grid USA, supporting broad energy network investment and climate change mitigation initiatives, which is particularly relevant to SCE's strategy and operations in California's regulatory environment. In addition to SCE's board of directors, Marcy serves on the board of Clean Harbors where she is a member of the Environmental, Health, and Safety Committee. With her deep knowledge of large infrastructure investments and large employee groups, she is a valuable contributor to safety-related discussions.

Safety-specific Executive Experience:

National Grid PLC

- President, National Grid Massachusetts and Executive Vice President, U.S. Policy and Social Impact (2011-2021)

National Grid is one of the largest investor-owned energy companies in the U.S., serving more than 20 million people throughout New York and Massachusetts. In her more than 30-year career at National Grid, Ms. Reed gained extensive utility operations experience, culminating with the top executive position at the U.S. subsidiary that is responsible for ensuring safe and reliable electricity and gas distribution services for over six million people throughout Massachusetts. She also had ultimate management responsibility for the health and safety of National Grid's more than 5,000 employees in Massachusetts. While at National Grid, Ms. Reed chaired the National Grid Massachusetts Gas & Electric Operational Safety Committee, including the oversight and inclusion of the Labor/Management Safety Committee discussions and results. She also directed strategic energy policy development at National Grid USA, supporting broad energy network investment and climate change mitigation initiatives. Among the Massachusetts policy considerations in which she was involved, were the consideration of the safety of residential-based solutions, employee safety considerations of innovative gas solutions, battery storage safety, and other safety-related concerns.

Safety-specific Board of Directors Experience:

- **Clean Harbors, Inc.** (2021-present)

Clean Harbors is a leading U.S. provider of environmental and industrial services, providing a range of services, such as end-to-end hazardous waste management, emergency spill response, industrial cleaning and maintenance, and recycling services. One of Clean Harbor's top priorities is to continually improve safety. Ms. Reed is a member of the Environmental, Health, and Safety Committee and Audit Committee Chair.

Other Current and Past Board of Director Experience

- **HomeWorks Energy, Inc.** (2021-present)

HomeWorks Energy provides energy conservation advice and solves home energy efficiency challenges.

- **Qualus Power Services LLC** (2021-present)

Qualus Power Services is a power engineering and technical services firm that partners with utility, commercial, industrial and government clients to provide solutions to the increasingly complex electrical infrastructure challenges. Ms. Reed serves as Audit Committee Chair.

- **National Grid Foundation** (2019-2022)

National Grid Foundation supports and engages non-profit organizations that take ownership for implementing educational and environmental programs and solutions. Since its inception in 1998, it has granted \$35 million to local community organizations throughout New York, Massachusetts and Rhode Island.

- **Northeastern University** (Trustee) (2017-present)

- **Blue Cross Blue Shield of Massachusetts** (2016-present)

- **The Partnership, Inc.** (2007-2022)

The Partnership is a New England organization focused on attracting, retaining, and developing professionals of color at all levels of leadership, offering leadership development programs for professionals of color and providing services for companies so professionals and executives of color can thrive in today's global workforce.

- **Greater Boston Chamber of Commerce** (2014-2021)

- **New England Council** (2010-2021)

- **Massachusetts Business Roundtable** (2007-2021)

- **British American Business Council** (2008-2013)

- **United Way of Central Massachusetts** (2004-2016)

Carey Smith – Safety Qualifications

Carey Smith is the Chair, President and CEO of Parsons, an advanced technology company focused on the infrastructure, defense and intelligence markets. Parsons was headquartered in Southern California until 2019 and continues to have significant infrastructure work throughout the state where approximately 10% of their workforce performs projects such as the Los Angeles International Airport (LAX) landside access modernization program. Ms. Smith is responsible for Parsons' businesses across cybersecurity, missile defense, space, critical infrastructure protection, transportation, environmental remediation and water/wastewater treatment markets. Parsons was recognized in 2019 by the National Safety Council with the prestigious Robert W. Campbell award for business excellence through the integration of environment, health, and safety (EHS) management. Her strategic leadership role and understanding of the impact of California's regulatory landscape on SCE's business customers contribute to the Board's effective oversight of key issues confronting the electric utility industry. Ms. Smith's operational experience in safety-intensive environments provides an important perspective to the Board and its Safety and Operations Committee. She brings a strong background in cybersecurity through her aerospace and defense industry experience and is a certified cybersecurity governance professional by the National Association of Corporate Directors.

Safety-specific Executive Experience:

Parsons Corporation

- Chair, President and CEO (2022-present)

Parsons is an advanced technology company focused on the infrastructure, defense and intelligence markets. As the top executive at Parsons, Ms. Smith has oversight of the workforce, which operates in safety-intensive environments.

Other Current and Past Executive Experience:

Honeywell Aerospace Inc.

- Division President, Defense & Space Strategic Business Unit (2015-2016)

Lockheed Martin Inc.

- Vice President, Technical Services (2007-2011)

Safety-specific Board of Directors Experience:

- **Parsons Corporation** (2016-present), Ms. Smith serves as Chair.

Other Current and Past Board of Director Experience

- **Professional Services Council** (2016-present)

PSC is a trade association for the government technology and professional services industry. PSC is a respected industry leader on legislative and regulatory issues related to government

acquisition, business and technology and helps shape public policy, leads strategic coalitions, and works to build consensus between government and industry. Ms. Smith serves as Chair.

- **The Intelligence and National Security Alliance** (2021-present)
- **National Association of Corporate Directors** (2022-present)
- **United States Geospatial Intelligence Foundation** (2020-2022)

Keith Trent – Safety Qualifications

Keith Trent, a former senior executive at Duke Energy, provides extensive utility operations, strategic planning, legal and safety experience as an executive of one of the largest electric power companies in the U.S., where he had direct management responsibility for the health and safety of a large workforce. His utility operational experience in, and perspective on, regulation, risk management, safety and cybersecurity are particularly relevant to our business and the regulatory framework in which we operate. Mr. Trent is also on the Board of Capital Power Corporation, where he serves as the chair of the Health, Safety and Environmental Committee.

Safety-specific Executive Experience:

Duke Energy Corporation

- Executive Vice President, Grid Solutions and President, Midwest & Florida Regions (2015)
- Executive Vice President and Chief Operating Officer, Regulated Utilities (2013-2014)

Mr. Trent's senior executive experience at Duke Energy included utility operational, strategic planning, legal, and safety responsibilities. He had direct management responsibility for the health and safety of a large workforce.

Other Current and Past Executive Experience:

Snell, Brannian & Trent

- Partner and Co-Founder (1991-2002)

Safety-specific Board of Directors Experience:

- **Capital Power Corp** (2017-present)

Capital Power is a growth-oriented North American wholesale power producer with a strategic focus on sustainable energy headquartered in Canada. Mr. Trent serves as the Chair of Health, Safety and Environmental Committee.

- **TRC Companies, LLC** (2016-present)

TRC delivers professional services for public, private and government clients, taking an integrated approach to client problems and harnessing environmental, consultative, engineering and applied technology experience. TRC is strongly committed to safety and has an executive safety council that provides leadership for safety initiatives that protect not only TRC employees, but the work sites they frequent.

- **Electric Power Research Institute** (2013-2015)

The Electric Power Research Institute or EPRI, is an independent non-profit energy research, development, and deployment organization. EPRI's research and development programs are

meant to advance the clean, affordable, safe and reliable production and delivery of electricity for the public benefit.

- **Keystone Energy Board (2010-2015)**

Keystone Energy Board is a forum for energy sector leaders to learn about and discuss timely issues, examining the linkages among energy, environmental and economic policies.

Other Current and Past Board of Director Experience

- **Brookstone Schools (2018-present)**
- **Forsite Development, Inc. (2016-2019)**
- **AWP, Inc. (Area Wide Protective) (2016-2020)**
- **Charlotte Chamber of Commerce (2014-2015)**

Addendum 2
July 20th, 2023 SCE CPUC
OEIS BOD Safety Public
Meeting

CPUC/ENERGY SAFETY **PUBLIC MEETING ON SAFETY**

Steve Powell

Chair, SCE Board
President and Chief Executive Officer, SCE

Tim O'Toole

Chair, SCE Safety and Operations Committee, SCE Board Director

Available for Q&A:

David Heller

Chief Risk Officer, SCE; Vice President, Enterprise Risk Management & Insurance and General Auditor, SCE

Andrew Martinez

Chief Safety Officer, SCE; Vice President of Safety, Security, and Business Resiliency, SCE

July 20, 2023



SAFETY IS INTEGRATED INTO OUR BUSINESS THROUGH OUR VALUES AND MISSION

MISSION

Safely provide reliable, clean and affordable energy to our customers

VALUES

Safety

Integrity

Excellence

Respect

**Continuous
Improvement**

Teamwork

RISK-INFORMED SAFETY FOCUS AREAS

Public Safety

- Reduce risk of significant wildfires
- Maintain/replace assets to avoid hazardous failures
- Create awareness of potential hazards

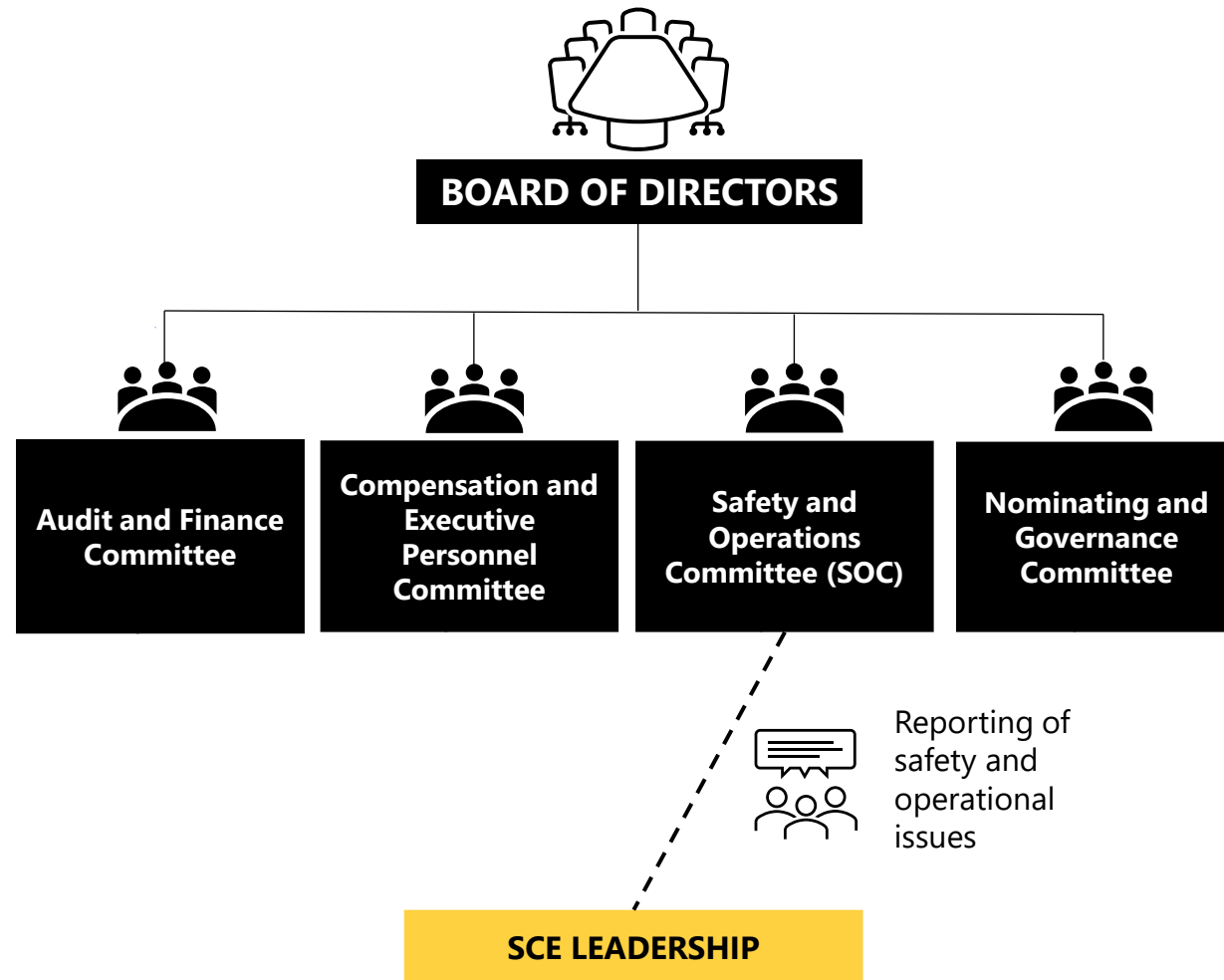
Worker Safety

- Avoid serious injuries and fatalities through enhanced data analytics and safety programs
- Better manage our contractors to improve safety, quality and compliance

Safety Culture

- Evolve safety culture maturity
- Improve leader ownership and accountability

CORPORATE GOVERNANCE: SCE'S SAFETY AND OPERATIONS COMMITTEE (SOC)

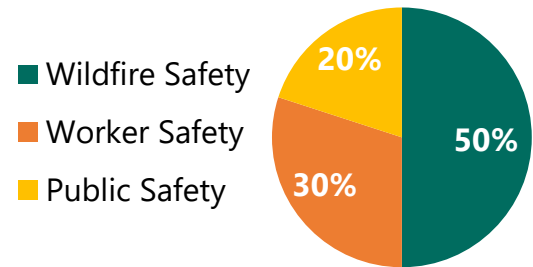


- Safety and Operations Committee (SOC) oversees SCE's safety performance and culture, operational goals, safety and operational risks, and significant safety-related incidents involving employees, contractors or members of the public
- SOC meets at least five times a year and receives regular reports from SCE leadership on safety; SCE Board regularly observes operations across SCE service area
- SOC provides input on operational goals to the Compensation and Executive Personnel Committee; works with Audit and Finance Committee on oversight of operational risk
- SOC Chair reports to the full Board of Directors on key safety and operational updates at each Board meeting

SOC RECEIVES REGULAR BRIEFINGS ON KEY SAFETY ISSUES AND RECOMMENDS FURTHER ACTIONS FOR MANAGEMENT

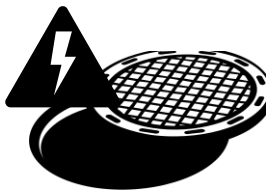
- Safety issues reviewed by the SOC include: Public Safety, Wildfire Safety, and Worker Safety, among other topics
- SCE has completed 100% of the 2021 SOC recommendations, and all but one of the 2022 SOC recommendations

2021 and 2022 SOC Recommendations by Category*



*Figures are rounded

Examples of SOC Recommended Areas of Focus



Underground equipment failure and wire down events and the impacts of mitigations [Q1 2022]



Proactive customer communications on wildfire mitigation efforts [Q4 2022]



Potential tools/technologies that can support the safety of workers performing solo work [Q1 2023]

Note: The full set of recommendations can be found in SCE's Quarterly Notification Letters, which are located at: <https://www.sce.com/safety/wild-fire-mitigation>

SOC AND MANAGEMENT MONITOR SAFETY PERFORMANCE USING A COMPREHENSIVE SET OF METRICS ACROSS KEY SAFETY RISK AREAS

- Safety performance metrics span wildfire, public, and worker safety areas to provide a holistic view of company safety performance
- Annual targets are set to achieve a balance between being challenging and attainable

REPRESENTATIVE METRICS REGULARLY REVIEWED BY SOC (*NOT EXHAUSTIVE*)



WILDFIRE

- CPUC reportable ignitions in HFRA
- Covered conductor circuit miles installed
- Vegetation Line Clearing: % of trims on time
- Ground & aerial HFRA inspections & remediations
- PSPS customer notifications: % of timely notifications



PUBLIC SAFETY

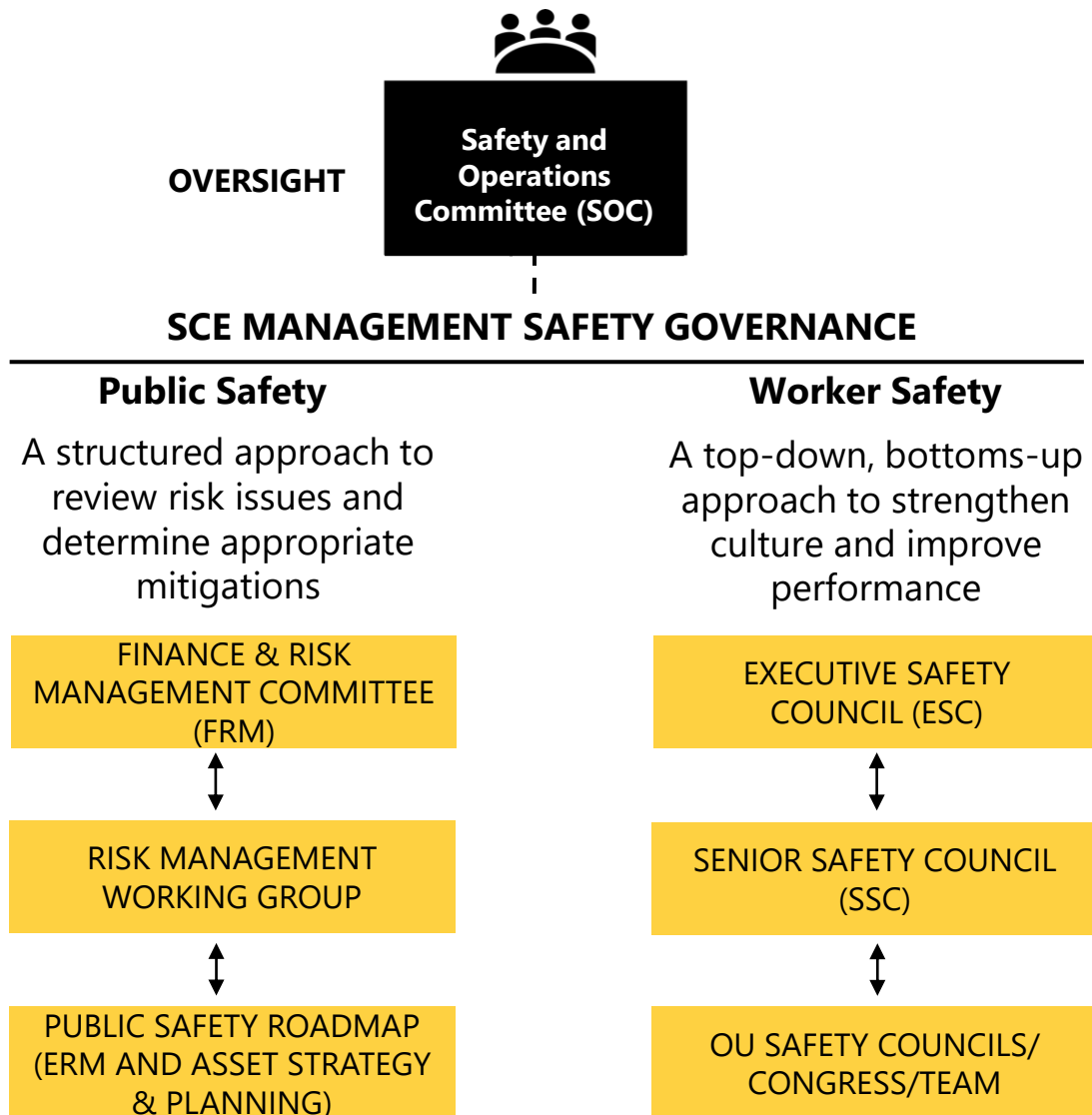
- Public SIFs due to system failures
- Public SIFs reported to CPUC
- Wire downs across SCE territory
- Underground equipment failures
- Public safety campaign awareness



WORKER SAFETY

- Serious Injuries and Fatalities (SIFs)
- Days Away, Restrictions or Transfers (DART)
- Safety Observations
- Close calls
- Vehicle incidents

SCE'S SAFETY GOVERNANCE MODEL HELPS TO STRENGTHEN CULTURE AND IMPROVE SAFETY PERFORMANCE



SAFETY GOVERNANCE IS FURTHER ENHANCED THROUGH **THREE LINES OF DEFENSE**

1st

Front Line Organizations
Accountable for executing controls

2nd

Enterprise Risk Management (ERM), Safety Org, QA/QC groups, Ethics & Compliance
Proactive advice, oversight, and monitoring

3rd

Audit Services Department
Independent assurance

ENTERPRISE RISK MANAGEMENT HELPS IDENTIFY ISSUES AND DRIVE IMPROVEMENTS IN PUBLIC SAFETY

ERM systematically helps identify and drive mitigation of operational and other risks through a common risk management framework, modeling, tools, and taxonomy



CLIMATE
CHANGE



WILDFIRE
/ PSPS



CONTACT
WITH
ENERGIZED
EQUIPMENT



UNDERGROUND
EQUIPMENT
FAILURE



SEISMIC



PHYSICAL
SECURITY



CYBER
ATTACK



HYDRO
DAM
FAILURE



DIG INS



VEHICLE HIT
POLE

Public safety risk mitigations are prioritized based on risk assessment

- Infrastructure Hardening and Replacement
- Inspections & Remediations
- Vegetation Management
- Situational Awareness
- Data Governance
- Emerging Technology
- Emergency Preparedness
- Grid Operations & Protocols
- Customer Care Programs

SCE'S INTEGRATED WILDFIRE MITIGATION STRATEGY TAKES A RISK-INFORMED APPROACH TO MITIGATION SELECTION AND DEPLOYMENT

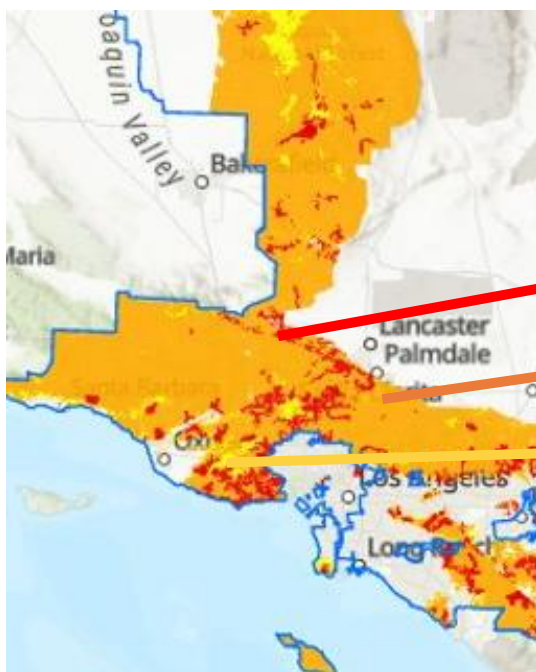
1 IDENTIFY AND PRIORITIZE RISKIEST AREAS USING RISK MODELS AND TOOLS



2 DETERMINE BEST MITIGATION(S) TO ADDRESS RISK DRIVERS IN EACH AREA



3 VALIDATE/REVISE MITIGATION SELECTION THROUGH EXPERT REVIEWS



***Other mitigations** include fire-resistant poles installation, asset inspections, fast curve settings for circuit breaker relays, along with vegetation management activities (as necessary), including hazard tree management program, pole brushing and line clearing

SEVERE RISK AREA MITIGATION

Covered conductor, Rapid Earth Fault Current Limiter (REFCL) & other mitigations* — OR — undergrounding for fire risk egress constrained locations, extreme high wind areas, communities of elevated fire concern, and/or extreme consequence areas

HIGH CONSEQUENCE AREA MITIGATION

Covered conductor & other mitigations* for locations that meet 300-acre confidence threshold at 8 hours, or locations at risk of PSPS

OTHER HFRA MITIGATION

Inspections & remediation, vegetation management & other mitigations* for locations not in severe risk or high consequence areas

SCE IS SEEING NUMEROUS PROOF POINTS AND RESULTS FROM ITS SUBSTANTIAL WILDFIRE MITIGATION EFFORTS SINCE 2018

4,580+ MILES
OF COVERED CONDUCTOR



71% fewer faults on fully covered circuits¹

2 MILLION+
TRIMS AND REMOVALS IN HFRA



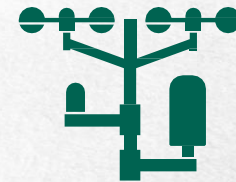
53% fewer tree-caused faults²

1 MILLION+
HFRA INSPECTIONS



61% lower defect find rate³

1,630+ WEATHER STATIONS **180+ HD CAMERAS**



90% visual coverage of HFRA

No ignitions due to failure of covered conductor⁴

98% fewer structures destroyed in 2021-22 compared to 2017-18

92% fewer acres burned in 2021-22 compared to 2017-18

15% fewer CPUC reportable ignitions in high fire risk areas in 2022 compared to 2021

1. Measured by faults covered conductor is expected to mitigate per 100 circuit miles on fully covered circuits as compared to bare circuits from 2018-2022 in HFRA

2. Measured by average monthly tree caused circuit interruptions in HFRA in 2022 compared to the average from 2017-2019

3. Measured as Total Defect Find Rate of Top Ignition Drivers (percentage of inspections) in 2022 as compared to 2019 (inception of program) for structures inspected every year

4. For the drivers that covered conductor is intended to mitigate

SCE CONTINUOUSLY EVALUATES NEW TECHNOLOGIES AND APPROACHES TO FURTHER REDUCE WILDFIRE RISK

- SCE pilots new technologies to evaluate their technical and operational capabilities, cost, feasibility to implement, and other factors prior to fully integrating into the mitigation portfolio
- These technologies can ultimately complement existing wildfire initiatives by mitigating risk drivers not previously addressed, or by potentially addressing drivers in more effective ways



RAPID EARTH FAULT CURRENT LIMITER (REFCL)

Detects and reduces ground fault energy before ignition can occur



OPEN PHASE DETECTION

Detects broken conductor and de-energizes before the line hits the ground



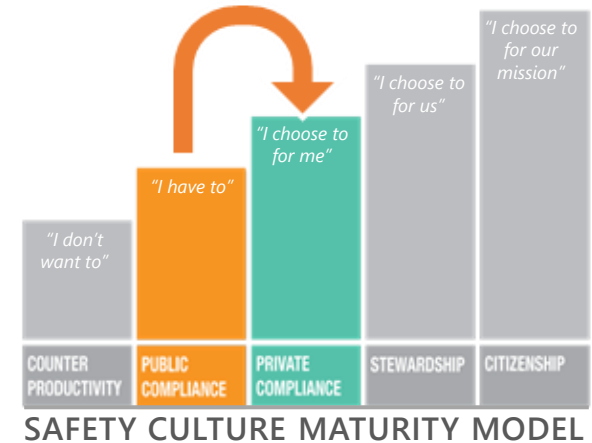
EARLY FAULT DETECTION

Detects deteriorated, damaged or compromised assets before a fault occurs

SAFETY CULTURE ASSESSMENT EFFORTS AT SCE

SCE: TRIENNIAL SAFETY CULTURE ASSESSMENT

- SCE has administered an independent comprehensive safety culture assessment triennially since 2017
- SCE's safety culture roadmap efforts have increased safety culture maturity and driven notable improvements in psychological safety and leader safety engagement



ENERGY SAFETY: ANNUAL SAFETY CULTURE ASSESSMENT

2021 RECOMMENDATIONS IMPLEMENTED



2022 APPROACH FOR RECOMMENDATIONS

- Embedding learning organization concepts into culture
- Mitigating serious exposure posed by interactions with discontented members of the public
- Improved safety-related communication concerning wildfire roles and decisions
- Improved wildfire employee communications
- Continue building capacity as a learning organization and improving organizational processes
- Sustain ongoing efforts to mitigate workers' risk exposure posed by interactions with discontented members of the public
- Strengthen safety communication channels between leadership and frontline workers
- Continue delivering REFCL training to frontline workers with enhanced training materials

CPUC/ENERGY SAFETY
PUBLIC MEETING ON SAFETY

Thank you



SOUTHERN CALIFORNIA
EDISON[®]

Appendix: Safety Metric Performance Examples

		2020	2021	2022
Wildfire Safety	CPUC reportable ignitions in HFRA	50	48	40
	Covered conductor circuit miles installed	965	1,454	1,399
	Vegetation Line Clearing: % of trims on time	82%	79%	88%
	Ground & aerial HFRA inspections and remediations ¹	72%	74%	80%
Public Safety	Public SIFs due to system failures	1	0	1
	Public SIFs reported to CPUC	12	9	5
	Wire downs across SCE territory ²	1,099	1,153	1,029
Worker Safety	Employee Serious Injuries and Fatalities (SIFs) Rate	0.124	0.062	0.088
	Employee Days Away, Restrictions or Transfers (DART) Rate	0.9	1.05	1.18
	Contractor SIF Rate	0.192	0.124	0.06
	Contractor DART Rate	0.45	0.36	0.26

[1] Represents the percentage of P2 findings remediated 30 days before compliance due date

[2] Includes distribution primary wire downs including major event days