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Vice President  
Regulatory Affairs

October 8, 2024

Docket #: 2024-SCs

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

**SUBJECT:** Southern California Edison Company's 2024 Safety Certification Request

Dear Director Thomas Jacobs:

Pursuant to California Public Utilities Code Section<sup>1</sup> 8389(e) and (f), Southern California Edison Company (SCE) submits this 2024 Safety Certification request and supporting documentation. SCE's 2023 safety certification was granted on December 7, 2023 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 2024 Safety Certification Guidelines issued by Energy Safety on August 8, 2024 (Guidelines):<sup>2</sup>

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

**Energy Safety Guidelines: 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.<sup>3</sup>**

SCE's 2023-2025 Wildfire Mitigation Plan was approved on October 24, 2023. 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.

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

<sup>2</sup> Office of Energy Infrastructure Safety's Safety Certification Guidelines (hereinafter "Guidelines"), August 8, 2024, available at [Safety Certification Guidelines](#).

<sup>3</sup> Guidelines, p. 2.

On April 2, 2024, SCE submitted its 2025 WMP Update.<sup>4</sup> Energy Safety issued a Draft Decision stating its approval on August 22, 2024.<sup>5</sup> In the 2024 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.<sup>6</sup>

Thus, we are submitting this request while we await Energy Safety's Final Decision on our 2025 WMP Update.

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 Guidelines:** 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.<sup>7</sup>

SCE's most recent safety culture assessment was conducted by National Safety Council (NSC), an independent consultant retained by Energy Safety, in 2023.

On February 23, 2024, Energy Safety published a draft report of NCS' findings and recommendations based on an evaluation of SCE's safety culture assessment. Energy Safety issued a revised and final 2023 SCA report (SCA Report) attaching SCE's comments to the draft report on March 22, 2024.<sup>8</sup> The recommendations by Energy Safety on SCE's 2023 safety culture assessment and SCE's response to these recommendations are described below.

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<sup>4</sup> See Southern California Edison Company's 2025 Wildfire Mitigation Plan Update, submitted April 2, 2024, [SCE 2025 WMP Update R0 \(April 2, 2024\)](#). On June 4, 2024, SCE submitted an updated version to its 2023-2025 WMP base plan. The version reflects errata and corrections to the base plan based on the 2025 WMP Update.

<sup>5</sup> Office of Energy Infrastructure Safety Draft Approval of Southern California Edison Company's 2025 Wildfire Mitigation Plan Update, available at [Energy Safety Draft Decision on SCE 2025 Wildfire Mitigation Plan Update](#).

<sup>6</sup> Guidelines, pp. 6-7.

<sup>7</sup> Guidelines, p. 2.

<sup>8</sup> 2023 Safety Culture Assessment Report for SCE, available at [2023 SCA for SCE](#).

The report states that SCE “has exhibited continued growth in safety culture maturity since 2021,”<sup>9</sup> and that “inputs indicated that SCE is succeeding in integrating contractors into SCE’s safety culture.”<sup>10</sup> The report makes five recommendations to drive consistent improvements in SCE’s safety culture.<sup>11</sup>

1. Continue to Build SCE’s Capacity as a Learning Organization (Recommendation 3.1): SCE should build its capacity as a learning organization. It should take a proactive approach to incorporating feedback to improve organizational processes. It should also take steps to increase workers’ psychological safety to improve the quantity and quality of safety event (near-miss and hazard) reports, by:
  - Focus on improving safety-enabling systems such as the investigation and root cause analysis of incidents.
  - Offer more opportunities for frontline workers and contractors to discuss lessons learned from safety events (near-misses and hazards) to foster psychological safety (i.e., a sense of safety that allows workers to feel empowered to speak up).
  - Measure frontline leaders’ progress on implementing training concepts such as coaching conversations to provide accountability and allow SCE to evaluate its improvement through learning and refine actions as needed.
  - Develop and implement a plan to increase the quantity and quality of safety event (near-miss and hazard) reports submitted by frontline employees. The effectiveness of an event investigation depends on the quality of the information reported about the event.
2. Strengthen Safety Communications Between Leadership and Frontline Workers (Recommendation 3.2): SCE should continue efforts to improve safety communications between leadership and frontline workers, by:
  - Consider deploying an incident management team liaison to the field during incidents to be a part of monitoring and service restoration to better understand the frontline workers’ experiences.
  - Continue to implement measures to increase organizational learning through regular cross-departmental topic-specific safety listening sessions.

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<sup>9</sup> SCA Report, p. 3.

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*, pp. 22-29.

3. Improve Training for Frontline Workers on Wildfire Suppression and Mitigation Technology (Recommendation 3.3): SCE should increase training for frontline workers on wildfire suppression and the installation and operation of new technologies related to wildfire mitigation, including rapid earth fault current limiter (REFCL) devices, by:
  - Continue to improve its training for frontline workers, particularly concerning wildfire suppression and the installation and operation of new technologies related to wildfire mitigation (e.g., rapid earth fault current limiter [REFCL] devices).
  - Increase training options to include more hands-on and less computer-based delivery.
4. Mitigate Risk Exposure Posed by Interactions with the Public (Recommendation 3.4): SCE should continue to recognize and take action to mitigate the risk exposure posed by interactions with the public by:
  - Continue to recognize and take action to mitigate the risk exposure posed by interactions with the public.
  - Continue to track these incidents and further strengthen its strategy for managing risk exposure posed by interactions with the public.
5. Increase Engagement in Workforce Survey (Recommendation 3.5): SCE should increase engagement on the safety culture assessment within the workforce supporting wildfire mitigation initiatives, by:
  - Must employ a more robust communication strategy that involves senior leadership to promote the survey.
  - Must consider ways to diversify the tactics for soliciting survey responses from the workforce.

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 April 24, 2024, thereby meeting this requirement.<sup>12</sup> SCE reiterates that commitment for purposes of this safety certification request.

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<sup>12</sup> See Southern California Edison Company's Agreement to Implement the Findings (Including Recommendations) of the 2023 Safety Culture Assessment Report, filed April 24, 2024, *available at* [SCE Acceptance of 2023 Safety Culture Assessment Report](#).

SCE is actively implementing these recommendations and provided updates on its progress in its Quarterly Notification letters.<sup>13</sup>

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 Guidelines:** 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.<sup>14</sup>**

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

- 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-

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<sup>13</sup> 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, 2024 (Q4 2023 QNL), *available at* [Q4 2023 QNL](#); 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, 2024 (Q1 2024 QNL), *available at* [Q1 2024 QNL](#) 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, 2024 (Q2 2024 QNL), *available at* [Q2 2024 QNL](#).

<sup>14</sup> Guidelines, p. 3.

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 - EIX SOC Charter.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 four 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 2023 Quarterly Notification Letter filed with Energy Safety on February 1, 2024, SCE's Q1 2024 Quarterly Notification Letter filed on May 1, 2024, and SCE's Q2 2024 Quarterly Notification Letter filed on August 1, 2024.<sup>15</sup> Per Section 8389(e)(7),<sup>16</sup> the Quarterly Notification Letter replaces the Quarterly Advice Letter filed with the CPUC. SCE's Q3 2024 Quarterly Notification Letter will be submitted on November 1, 2024.

**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,

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<sup>15</sup> See SCE's Q4 2023 Quarterly Notification Letter (QNL), Q1 2024 QNL and Q2 2024 QNL.

<sup>16</sup> 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."

or is working to implement, these recommendations. Some of the 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 2023 Quarterly Notification Letter filed with Energy Safety on February 1, 2024, SCE's Q1 2024 Quarterly Notification Letter filed on May 1, 2024, and SCE's Q2 2024 Quarterly Notification Letter filed on August 1, 2024.<sup>17</sup>

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 Guidelines: 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.**<sup>18</sup>

SCE's executive compensation structure meets the requirements of Section 8389(e)(4). SCE provided details of that structure, including its final 2024 annual incentive goals and metrics as approved by the SCE Board of Directors' independent Compensation and Executive Personnel Committee (Compensation Committee) in its April 12, 2024<sup>19</sup> submission to Energy Safety.

On October 4, 2024, Energy Safety approved SCE's 2024 executive compensation structure.<sup>20</sup> Energy Safety's letter specified that "SCE's revised submission satisfies the requirements of Public Utilities Code sections 8389(e)(4) and 8389(e)(6) and the 2024 Executive Compensation Structure Submission Guidelines (2024 Guidelines)."<sup>21</sup>

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<sup>17</sup> See SCE's Q4 2023 QNL, Q1 2024 QNL and Q2 2024 QNL.

<sup>18</sup> Guidelines, p. 3.

<sup>19</sup> See Southern California Edison Company's 2024 Executive Compensation Structure Submission, submitted April 12, 2024, and resubmitted an errata on April 26, 2024, available at [SCE 2024 ECSS R1 4-26- 2024](#).

<sup>20</sup> Office of Energy Infrastructure Safety Approval of Southern California Edison Company's 2024 Executive Compensation Structure Submission (2024 Executive Compensation Approval), available at [Decision on SCE's Executive Compensation Structure Submission](#)

<sup>21</sup> 2024 Executive Compensation Draft Approval, p. 1.

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 Guidelines:** 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.<sup>22</sup>

On August 29, 2024, SCE's Chair of the Safety and Operations Committee of the Board of Directors, Timothy O'Toole, along with Jill Anderson, Executive Vice President and Chief Operating Officer, David Heller, Vice President of Enterprise Risk Management & Insurance and General Auditor, and Marc Ulrich, Vice President of Environmental, Health, Safety, and Quality, 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 Guidelines:** The statute requires an electrical corporation to submit a notification of implementation to Energy Safety on a quarterly basis detailing progress 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 its quarterly notification letters, SCE presented detailed information about how it has made meaningful progress towards meeting its WMP Update Program Targets for each of the wildfire-related mitigation activities and programs; implemented actions to address the five findings and recommendations identified in the 2023 SCA Report; and included descriptions of the recommended actions from the Safety and Operations Committee meetings. SCE timely submitted its Q4 2023 Quarterly Notification Letter filed with Energy Safety on February 1, 2024, its Q1 2024 Quarterly Notification Letter on May 1, 2024, and its Q2 2024 Quarterly Notification Letter on August 1, 2024.<sup>23</sup>

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<sup>22</sup> Guidelines, p. 3.

<sup>23</sup> See SCE's Q4 2023 QNL, Q1 2024 QNL and Q2 2024 QNL.

In 2024, SCE is tracking 37 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. Although SCE is facing challenges on completing eight of its targets due to several factors largely outside of SCE's control, including permitting delays and material shortages, SCE remains on track to substantially comply with its WMP.

The information noted above regarding activity status is current as of the date of the Q2 Quarterly Notification submitted on August 1, 2024. SCE will provide further updates on its progress implementing these activities in its Q3 Quarterly Notification on November 1, 2024.

### **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 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,

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**Michael Backstrom**

Vice President

Regulatory Affairs