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December 18, 2020

Via E-Mail Only

Ms. Caroline Thomas Jacobs
Wildfire Safety Division, Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Email: wildfiresafetydivision@cpuc.ca.gov

Re: Comments of the Coalition of California Utility Employees on the Wildfire Safety Division's Draft Safety Culture Assessment Requirements

Dear Ms. Jacobs:

We write on behalf of the Coalition of California Utility Employees ("CUE") to provide comments on the Draft Safety Culture Assessment Requirements of Electrical Corporations¹ ("Draft SCA Requirements") proposed by the Wildfire Safety Division ("WSD").

I. INTRODUCTION

CUE is a coalition of labor unions whose approximately 43,000 members work at nearly all the California utilities, both publicly and privately owned. CUE's coalition union members make up the on-the-ground workforces of the three large electrical corporations that implement electric operations and maintenance policies and practices, including, for example, grid hardening activities and service restoration following a power safety power shutoff event. CUE's coalition union members would therefore be directly impacted by implementation of the proposed workforce survey.

¹ Wildfire Safety Division, Draft Safety Culture Assessment: Requirements of Electrical Corporations (Dec. 2020).

1011-1722j

CUE greatly appreciates the WSD's efforts in developing the Draft SCA Requirements. CUE's comments address two issues: (1) participation in workforce survey planning meetings, and (2) prioritization of individual privacy and data confidentiality during survey participation and data handling.

II. UTILITY EMPLOYEE REPRESENTATIVES SHOULD BE INCLUDED IN THE WORKFORCE SURVEY PLANNING MEETINGS

The Draft SCA Requirements expect a planning meeting to be conducted with each electrical corporation to be surveyed to define deadlines, finalize demographic questions, align on a method for identifying the targeted survey population, and ensure there is an agreement between each electrical corporation, WSD, and the third party administrator on the next steps and responsibilities.² However, the planning meeting participant list does not include any utility employee representatives.³ This is a serious deficiency as members of the survey group should have a voice at the table when finalizing the details regarding how the survey is administered.

CUE recommends adding utility employee representatives to the participant list for the workforce survey planning meetings. Their inclusion is important for two reasons. First, obtaining input from individuals who may participate in the survey would enhance the effectiveness of the surveys by accurately defining demographic questions, precisely identifying the target population, and tailoring communications appropriately. Second, including utility representatives in planning discussions could increase the likelihood of an effective response rate because the targeted population would have direct input in how the survey data was collected and distributed.

III. PRESERVING INDIVIDUAL PRIVACY AND DATA CONFIDENTIALITY IS OF PARAMOUNT IMPORTANCE AND MUST BE MAINTAINED THROUGHOUT THE ENTIRE PROCESS

CUE wholeheartedly supports the WSD's focus on privacy in administration of the workforce survey.⁴ It is essential that individual privacy be maintained

² *Id.* at pp. 8-9.

³ *Id.* at p. 9.

⁴ *Id.* at p. 10.

December 18, 2020

Page 3

during survey participation and that responses remain confidential. Taking necessary steps to ensure privacy and confidentiality not only prevents potential retaliation, but it also improves the quality of responses.

To that end, CUE agrees the workforce survey should be administered by a third-party vendor.⁵ The WSD must ensure that the third-party vendor takes appropriate precautions to preserve individual privacy and data confidentiality throughout the entire survey process. In addition, CUE agrees that clearly communicating the steps taken by the electrical corporations, WSD, and third-party administrator to ensure individual privacy and data confidentiality are critical to achieving authentic and reliable results and supports the survey communication guidelines.⁶

IV. CONCLUSION

CUE appreciates the WSD's ongoing efforts to improve safety and reduce the risk of utility-caused wildfires. CUE is committed to assisting the utilities' wildfire mitigation efforts and ensuring that the grid is maintained in a safe and reliable manner. Thank you for your consideration of these comments.

Sincerely,



Andrew J. Graf
Associate

AJG:ljl

cc: R.18-10-007 Service List

⁵ *Ibid.*

⁶ *Id.* at p. 9.