

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Wildfire Safety Division
California Public Utilities Commission

**SMALL BUSINESS UTILITY ADVOCATES' COMMENTS ON THE DRAFT SAFETY
CULTURE ASSESSMENT REQUIREMENTS OF ELECTRICAL CORPORATIONS**

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Director Caroline Thomas Jacobs
Wildfire Safety Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Via e-mail: wildfiresafetydivision@cpuc.ca.gov and R.18-10-007 service list

Re: Comments on the Draft Safety Culture Assessment Requirements

Dear Director Jacobs,

Pursuant to the Wildfire Safety Division's (Division) December 3, 2020 email, Small Business Utility Advocates (SBUA) submits the following comments on the Draft Safety Culture Assessment (SCA) Requirements of Electrical Corporations. As further detailed below, SBUA recommends requiring third-party administration for both the workforce survey and the self-assessment, and that these requirements should apply to both the investor-owned utilities (IOUs) and the small multijurisdictional utilities (SMJUs).

Workforce Survey

According to the Draft SCA, the workforce survey "will most likely be administered by a third party."¹ Similarly, the Draft indicates that data collection and tabulation will "most likely" be completed by a third-party administrator.² The final SCA should require third-party administration and data tabulation in order to ensure employee privacy, which will produce more reliable responses than if the utilities administer the survey.

SBUA also suggests requiring the third-party administrators to consider accessibility and make the surveys available in multiple languages to make the survey accessible to frontline employees who may not have a mastery of the English language. At a minimum, the survey should be made available in English and Spanish.

Self-Assessment

As proposed in the Draft SCE, only the IOUs would have to conduct a yearly self-assessment to provide the Division with information on each utility's organizational culture and the value placed on safety.³ SBUA encourages the Division to modify this requirement and instead of a self-assessment require a third-party administered assessment of each utility's culture. Self-assessments are not as reliable and may not prove useful to the Division because not

¹ Draft SCA, p. 10.

² Draft SCA, p. 12.

³ Draft SCA, pp. 13-14.

only may a utility hesitate to be too self-critical due to fears of opening itself to penalties or public backlash, but one is often unaware of one's shortcomings. Therefore, the Division should require third-party administration of the utility's organizational culture.

In addition, the Division should require this organizational assessment of both the IOUs and SMJUs. The workforce survey alone is not sufficient to understanding how the organization and culture of each SMJU prioritizes safety, which is a necessary component to completing a cultural assessment of each utility as required by Section 8389.⁴ At a minimum, the Division should require biennial organizational assessments of the SMJUs so that the public understands how these entities' structure and organization prioritize safety and how they can improve in this regard.

Interviews and Observational Visits

The Draft SCA indicates that the Division will determine whether interviews and observational visits are needed after reviewing the required surveys and assessments.⁵ SBUA suggests that the Division specify thresholds that will automatically trigger these events, while also leaving the door open for random selection. For example, the Division could require interviews and visits for every utility that receives an average score of 2 or lower on the organizational assessment or a score of 3 or lower on the workforce surveys. At the same time, utilities that score above these thresholds could be subject to an interview or visit depending on the last time the Division required either for that utility.

SBUA appreciates the opportunity to comment on this matter.

Sincerely,

/s/ 

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⁴ Pub. Util. Code § 8389(d)(4).

⁵ Draft SCA, p. 7.