

12/18/2020

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

SUBJECT: Southern California Edison Company's Comments on WSD's Draft Safety Culture Assessment (SCA) Requirements of Electrical Corporations

Director Thomas Jacobs,

Pursuant to the Draft Safety Culture Assessments (SCA) Requirements of Electrical Corporations issued on December 3, 2020, Southern California Edison Company (SCE) respectfully submits these Comments.

OVERVIEW

SCE welcomes the further clarity and details provided in WSD's Draft SCA Requirements (Draft Guidance) and agrees with the phased-in approach to implementing various elements as outlined in Attachment 4 to Resolution WSD-011. Specifically, SCE appreciates the focus in 2021 on workforce surveys and management self-assessments with interviews to be scheduled on an as-needed basis and observational visits unlikely. This will enable establishing a baseline in 2021 and incorporating additional elements in subsequent years, building on lessons learned. SCE focuses its comments below primarily on workforce survey considerations and looks forward to further discussing these with WSD and/or its third-party survey administrator early in 2021.

COVID-19 RESTRICTIONS, LANGUAGE AND TECHNOLOGY ACCESS SHOULD BE TAKEN INTO CONSIDERATION IN ADMINISTERING OF WSD'S WORKFORCE SURVEY

WSD's proposal for a workforce survey that targets employees, supervisors, managers and contractors who are engaged in wildfire hazard mitigation activities raises a number of logistical questions related to technology access and language considerations as well as current work restrictions related to COVID-19.

As WSD notes in its Draft Guidance, some SCE employees, including field personnel, as well as many contractors do not have ready access to email, computers, and/or company smartphones. In the past SCE has found it challenging to receive responses to surveys (including mailings to the home) without proctoring in a group environment. However, proctoring these surveys in a group environment is difficult, if not impossible, given the guidelines set forth by WSD (i.e. no co-workers in the vicinity of a worker completing a survey) as well as work restrictions necessitated by the pandemic.

Nonetheless, given COVID-19 related restrictions, the WSD workforce survey may have to be made available to employees and contractors through other means, but SCE notes response rates may be low if the surveys are not directly provided or administered. If WSD prefers that surveys are conducted in-person for field personnel who do not have easy access to company computers or smart phones, a random sampling of employees and contractors may be required to ensure appropriate social distancing.

Further, SCE notes that for some of its contractors who engage in wildfire hazard mitigation work (e.g. vegetation management) a multilingual survey will be necessary.

SCE currently utilizes a vendor to administer its Safety Pulse survey. SCE proposes utilizing this vendor for the WSD workforce survey as it would result in a streamlined and efficient process, given existing processes, infrastructure, and knowledge.

SCE SEEKS CLARIFICATION OF WORKFORCE SURVEY RATING SCALE

SCE does not take issue with any of the questions in the proposed workforce survey but notes that many questions are not dissimilar to current questions included in our Pulse surveys. SCE, however, seeks clarity on the rating scale to be used for responding to survey questions, which has not been provided in the Draft Guidance.

COST RECOVERY

SCE expects to incur costs for the time employees and contractors spend to respond to the survey, and potentially some additional administrative costs. SCE proposes recording any incremental costs in existing wildfire-related balancing or memorandum accounts and seeking cost recovery along with other incremental wildfire-related costs in these accounts.

SCE SEEKS CLARITY ON TIMING FOR COMPLETION OF SURVEY AND SUBMISSION OF SELF-ASSESSMENT

SCE appreciates the details provided for electrical corporations on completing the organizational self-assessment and plan for 2022¹, including questions, rating-scale, and list of potential supporting documentation requirements. In order for utilities to better plan for resource allocation and interorganizational coordination, SCE requests further clarity on expected timing of submission of management self-assessments. SCE further requests clarity on timing for completion of workforce surveys so that it can adjust its own internal survey schedule timing accordingly (e.g. to avoid the potential for employee confusion and survey fatigue that could arise from administering two similar surveys within a short time frame).

¹ Section 1.3.1 of the Guidance specifies that electrical corporations completing organization self-assessments in 2021 should indicate the “electrical corporation’s expected response to each question in January 2023 based on wildfire initiatives in the coming year”. SCE seeks clarity on whether WSD intended this to read as “expected response to each question in January 2022”.

CONCLUSION

SCE appreciates the opportunity to submit its Comments on WSD's Draft 2021 SCA Requirements and looks forward to further clarification on the above considerations as well as working with WSD and/or its third-party vendor early in 2021.

If you have any questions, or require additional information, please contact me at carla.peterman@sce.com.

Sincerely,

//s//

Carla Peterman
Senior Vice President, Strategy and Regulatory Affairs
Southern California Edison

cc: Service List for R.18-10-007
wildfiresafetydivision@cpuc.ca.gov