

July 19, 2019

Ms. Alice Stebbins
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

SUBJECT: Request for an Initial Safety Certification

Dear Ms. Stebbins:

Pursuant to California Public Utilities Code Section 8389(e) and the letter from Elizaveta Malashenko dated July 12, 2019, setting forth guidelines for Initial Safety Certification Applications, Southern California Edison Company (SCE) submits this letter and supporting documentation requesting an initial safety certification.

Below, SCE sets forth each of the requirements detailed in Public Utilities Code, Sections 8389(e) and (f) and how SCE meets them, as applicable, for this initial safety certification:

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

SCE filed its [2019 Wildfire Mitigation Plan](#) (WMP)¹ on February 6, 2019, in accordance with the requirements of Public Utilities Code Section 8386, enacted as part of California Senate Bill 901 and as implemented by the CPUC rulemaking R.18-10-007. SCE's WMP describes strategies, programs and activities that are in place, being implemented or are under development to proactively address and mitigate the threat of electrical infrastructure-associated ignitions that could lead to wildfires, further harden the electric system against wildfire risk and enhance wildfire suppression efforts. Importantly, these programs and activities are intended to further support public and worker safety. The WMP also includes goals and metrics that the CPUC can use to evaluate compliance. In response to Administrative Law Judge Thomas' January 17, 2019 Ruling, SCE included cost estimates for each of the wildfire prevention strategies and programs presented in Chapter 4 of the WMP. The CPUC approved SCE's WMP via [Decision 19-05-038](#) on May 30, 2019, noting "it contains the elements required by Public Utilities Code Section 8386(c)."

¹ SCE's Wildfire Mitigation Plan is available on SCE's website:

<https://www.edison.com/content/dam/eix/documents/investors/wildfires-document-library/20190206-wildfire-mitigation-plan.pdf>.

The decision approving SCE's Wildfire Mitigation Plan is available on the CPUC's website:

<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M298/K487/298487636.PDF>.

- **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, if applicable**

SCE has not yet undergone a CPUC-led safety culture assessment, but we look forward to working with the CPUC and other interested stakeholders to further review our safety culture and build upon existing efforts to strengthen it. Safety is the first of SCE's core values and this is demonstrated through our commitment to creating and maintaining a safe environment for our employees, contractors, and the public. Our Health & Safety organization is led by an SCE vice president, reporting to me, the chief executive officer. We are accountable to SCE's Board of Directors. Over the past several years, we have increased management focus on safety oversight, accountability, and partnering with our employees, contractors and communities to improve worker and public safety. In addition to implementing tools and processes to strengthen our safety culture (employee attitudes and behaviors), we continue to incorporate risk-informed planning in guiding the programs and activities we undertake toward our objectives of eliminating serious injuries and fatalities and reducing all injuries. We regularly benchmark with other companies to identify and implement industry best practices and report on our progress to SCE's Board of Directors, senior executives, and organizational unit leaders. We also share our performance and progress with the CPUC, Edison Electric Institute, North American Transmission Forum and peer groups. Importantly, we continue to improve our safety culture via in-person meetings, trainings, corporate messaging and the incorporation of feedback from all levels of the organization.

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

The SCE Board of Directors believes the safety of employees, contractors and the public is essential to the Company's values and success. As part of its oversight function, the Board directly engages with SCE management on safety topics, including both worker and public safety as well as wildfire mitigation. The Board has also established the Safety and Operations Committee which maintains joint responsibility with the full Board for safety oversight at SCE. The Safety and Operations Committee meets the requirements of the "Safety Committee" in Section 8389(e)(3) and links oversight of safety to the Company's operational practices. The Safety and Operations 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. These duties are outlined in the Safety and Operations Committee's charter attached to this certification request as Attachment A.

The Safety and Operations Committee receives regular safety reports from SCE management that include performance metrics, reporting on serious incidents, and actions to improve employee, contractor and public safety. The Chair of the Safety and Operations Committee then reports to the Board at its next meeting. Specific focus has been given to oversight of the development and implementation of SCE's Grid Safety and Resiliency Program and its Wildfire Mitigation Plan. Other significant focus areas in the past two years have included worker and public safety, SCE's safety culture, safe decommissioning of San Onofre Nuclear Generating Station, the safety and security of SCE's grid assets including cyber-security,

safety metrics and benchmarking, and response plans in the event of earthquakes or other natural disasters.

The Safety and Operations Committee is composed of five members of SCE's Board of Directors with relevant safety experience, each of whom meets the independence requirements of the New York Stock Exchange. The Chair of the Safety and Operations Committee is Timothy O'Toole. Mr. O'Toole 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 nonprofit 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 experience in the rail and bus transportation industry where worker and public safety is a paramount concern.

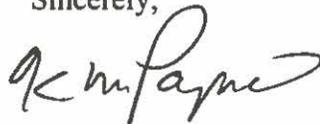
The other Safety Committee members possess diverse experience in areas important to safety and security including worker safety, public safety, safety culture, cyber-security, risk management, and environmental protection. Additional information with respect to the relevant safety experience of each member of the Safety and Operations Committee is provided in Attachment B to this letter.

- **Section 8389(e)(5) – The electrical corporation has established board-of-director-level reporting to the commission on safety issues**

SCE board member, President, and Chief Executive Officer, Kevin Payne, has and will continue to report to the CPUC on safety issues. SCE is committed to coordinating with the CPUC to establish additional Board-level reporting on safety issues in accordance with AB 1054 and will reflect the reporting responsibility in the appropriate governance document, which will be publicly available.

For all the foregoing reasons, SCE requests prompt issuance of an initial safety certification as required by Assembly Bill 1054. We appreciate the opportunity to continue working with the CPUC on this important topic and ask that you contact me or our Managing Director of Regulatory Affairs, Laura Genao, should you have any questions regarding this submission.

Sincerely,



Kevin M. Payne
President and Chief Executive Officer
Southern California Edison Company

Attachments (3)

cc: Elizaveta Malashenko, CPUC Deputy Executive Director for Safety and Enforcement

ATTACHMENT A

SCE Board of Directors Safety and Operations Committee Charter

**SOUTHERN CALIFORNIA EDISON COMPANY
CHARTER FOR THE SAFETY AND OPERATIONS COMMITTEE
OF THE BOARD OF DIRECTORS
Adopted by the Board of Directors
February 28, 2019**

ARTICLE I – COMPOSITION OF THE COMMITTEE AND SUBCOMMITTEES

Section 1. Size of the Committee.

The Safety and Operations Committee ("Committee") of the Board of Directors ("Board") of Southern California Edison Company ("Company") shall consist of not less than two members of the Board.

Section 2. Nomination and Appointment of Members.

Each Committee member shall be appointed by the Board and shall serve until a successor shall be appointed by the Board. In the event any member of the Committee shall cease to be a director of the Company, the vacancy thus created shall be either filled by the Board or, at the Board's discretion, left unfilled, provided that in no event shall the Committee consist of less than two members.

Section 3. Committee Chair.

The Board shall designate one of the Committee members as chair ("Chair") who shall preside over meetings of the Committee and report Committee actions to the Board. If the Chair is not present, the Committee may designate an acting Chair.

Section 4. Subcommittees.

The Board may form Subcommittees for any purpose and may delegate to such Subcommittees such power and authority as the Board deems appropriate; provided however; that a Subcommittee shall consist of at least two members of the Committee and that the Board shall not delegate any power or authority required by any law, regulation or stock exchange listing standard to be exercised by the Board as a whole. Each subcommittee member shall be appointed by resolution adopted by a majority of the exact number of authorized directors and shall serve until a successor is appointed. In the event any member of any Subcommittee shall cease to be a director of the Company, the vacancy thus created shall either be filled by the Board or, at the Board's discretion, left unfilled, provided in no event shall any Subcommittee consist of less than two members. The Board shall determine the chair of the Subcommittees.

ARTICLE II – MEETINGS AND OTHER ACTIONS

Section 1. Meeting Times, Agendas and Quorum.

The Committee shall hold meetings on a regularly scheduled basis and as necessary. Meetings shall be scheduled at the direction of the Chair, or as requested by one-half of the members of the Committee. One-third of the members of the Committee shall constitute a quorum for the transaction of business, provided that in no event shall a quorum be less than two members.

Section 2. Meeting Minutes.

The Company's Secretary shall keep, or appoint an appropriate employee of the Company to keep, regular minutes of all Committee proceedings. The minutes of each meeting shall be reviewed and approved by legal counsel and the Chair. The approved minutes shall become a permanent corporate record maintained by the Company's Secretary.

Section 3. Authority of the Committee.

Unless otherwise provided in this Charter, the meetings and any other actions of the Committee shall be governed by the provisions of Article III of the Bylaws of the Company applicable to meetings and actions of the Board, and the Committee shall have all of the authority of the Board in fulfilling its duties and responsibilities except as limited by said Article III of the Bylaws of the Company. Any matter which requires approval of the Committee may be approved by the Board in lieu of Committee approval.

ARTICLE III –SAFETY AND OPERATIONS COMMITTEE RESPONSIBILITIES

Section 1. Duties and Responsibilities.

The Committee shall have the following duties and responsibilities:

1. Review and monitor the Company's safety programs, policies and practices relating to:
 - The Company's safety culture, goals and risks;
 - Significant safety-related incidents involving employees, contractors or members of the public; and
 - The measures and resources to prevent, mitigate or respond to safety-related incidents.
2. Monitor the Company's safety and operational and service excellence performance metrics.
3. Review and monitor the Company's operations, significant developments, resources, risks and risk mitigation plans relating to:
 - Reliability, affordability and customer service;
 - Cyber and physical security;
 - Business resiliency and emergency response;
 - Information technology; and
 - Decommissioning of the San Onofre Nuclear Generating Station.
4. Perform such additional functions as the Committee determines are necessary or prudent to fulfill the Committee's duties and responsibilities.

ATTACHMENT B

Members of the Safety and Operations Committee

Timothy T. O'Toole, Chair

Mr. O'Toole served as chief executive officer of First Group plc, a publicly-traded transportation company that provides rail and bus services in the United Kingdom and North America from 2010 to 2018. FirstGroup operates, among other things, over 40,000 school buses in the U.S. as well as the Greyhound Bus Lines, and has a total workforce of over 100,000 employees. Mr. O'Toole is a director of the National Safety Council and previously served as a director of CSX Corporation. He previously served as managing director of the London Underground from 2003 through 2009. In that role he led the response to the 2005 terrorist bombing attacks on the London Underground for which the Queen awarded him the honor of Commander of the Most Excellent Order of the British Empire (CBE). Prior to his time at the London Underground, Mr. O'Toole served in various senior management roles during his 20 years of service at Consolidated Rail Corporation, including president and chief executive officer from 1998 to 2001.

Mr. O'Toole's extensive safety experience includes direct management experience of a large workforce in industries where worker and public safety are critical. He has been a member of the Safety Committee since he joined the Board in 2017.

Jeanne Beliveau-Dunn

Ms. Beliveau-Dunn has been the chief executive officer and president of Claridad LLC, a digital and internet of things (IoT) consulting company, since 2018. Prior to that, she served as vice president and general manager of Services for Cisco Systems Inc., the global technology leader in networking and security infrastructure. During her 22-year career at Cisco, she led services, products and operations within the business units and directed the advancement of new technology, staff operations, innovation and new services that helped customers transform. Jeanne also led the networking industry in developing deep the skills that help engineering teams build and protect global networks.

Ms. Beliveau-Dunn's relevant safety experience includes 28 years of managing a large workforce, building network operations and security teams, and building infrastructure and efficiency through technology and process for Cisco and its customers. Over her career she has helped companies design secure digital solutions that scale and enable companies to run more effectively. She is a recognized expert in networking, digital solutions and security having built these systems for Cisco and its customers. This experience is critical for the Safety and Operations Committee's oversight of cyber threats facing SCE. She has been a member of the Safety and Operations Committee since she joined the board in early 2019.

Linda G. Stuntz

Ms. Stuntz served as a partner of the law firm of Stuntz, Davis & Staffier, P.C. from 1995 to 2018, where she specialized in energy and environmental regulation. Ms. Stuntz previously served as Deputy Secretary of, and held senior policy positions in, the U.S. Department of Energy from 1989 to 1993, and served as associate minority counsel and minority counsel to the Energy and Commerce Committee of the U.S. House of Representatives from 1981 to 1987. She is a director of Royal Dutch Shell plc, and previously served as a director of Raytheon Company, Schlumberger, Ltd. and American Electric Power Company (AEP). Ms. Stuntz also previously served on the U.S. Secretary of Energy Advisory Board during 2015 and 2016.

Ms. Stuntz's relevant safety experience includes a variety of positions in the U.S. Government and private industry where safety is a key concern such as utilities and energy. In her time at the U.S. Department of Energy she held positions that focused on issues related to potential global climate change, a key issue in the wildfire risks facing California. She has been a long-time board member for public companies such as Raytheon and AEP which are in industries that have significant safety concerns for workers and the public, including electric utilities, oil and gas exploration and development, and defense. In her board roles she has provided oversight over a variety of safety issues that are common to those industries, including process safety. She has been a member of the Safety Committee since 2014.

Peter J. Taylor

Mr. Taylor has been the president of ECMC Foundation, a nonprofit corporation dedicated to educational attainment for low-income students, since May 2014. Prior to that he served as executive vice president and chief financial officer of the University of California from 2009 to 2014 and managing director of public finance at Lehman Brothers and Barclays Capital from 2002 to 2009. Mr. Taylor is a director of Pacific Mutual Holding Company and the Kaiser Family Foundation, and a member of the Board of Trustees of California State University. Previously, he was chair of the UCLA African American Admissions Task Force and a commissioner on the California Performance Review Commission.

Mr. Taylor's relevant safety experience includes several years as a senior executive of the University of California, which has 10 campuses, a staff of more than 190,000, and more than 238,000 students. During his tenure, the UC launched the "Be Smart About Safety" campaign across all campuses, including the five medical centers to focus on reducing employee injuries. As CFO of the UC, Mr. Taylor also had direct responsibility for risk management. His oversight role as a member of the Board of Trustees of the California State University includes oversight of the safety of more than 50,000 employees and nearly 500,000 students across 23 campuses. As Chair of SCE's Audit and Finance Committee, Mr. Taylor has oversight of the risk management functions of SCE, many of which have a direct impact on safety and compliance. He has been a member of the Safety Committee since 2018.

Keith Trent

Keith Trent has 15 years' experience as a utility executive, general counsel and internal legal counsel. From 2009 to 2015, he held a variety of senior executive positions with Duke Energy Corporation, with responsibility for long-term grid strategy, regulated utilities, electric transmission, regulated fossil-fuel and hydro generation, health, safety and environment, fuel and system optimization, central engineering and services, and commercial businesses operating in domestic and international retail and wholesale competitive markets. From 2002 to 2009, Mr. Trent held a variety of positions with Duke Energy with responsibility for corporate strategy, government relations, corporate communications, technology initiatives, legal, internal audit and compliance (as general counsel), and major litigation and government investigations (as lead litigator). Prior to 2002, Mr. Trent practiced law for 15 years. He is a director of TRC Companies, Inc. and of Capital Power Corporation, an independent power generation company where he is Chair of the Health, Safety and Environmental Committee.

Mr. Trent's has extensive safety experience as an executive of Duke Energy, one of the largest electric power companies in the U.S. Duke's electric utilities, generation companies, and natural

gas distribution operations have thousands of employees in the field and millions of customers. Mr. Trent had direct management responsibility for health and safety at Duke's regulated utilities. At Capital Power Corporation, a publicly-traded company wholesale power generator, Mr. Trent is a member of the Health, Safety and Environment Committee of its Board of Directors, which has oversight responsibility for the impact of the company's operations on the environment and on the workplace health and safety of employees. He has been a member of the Safety Committee since he joined the Board in 2018.

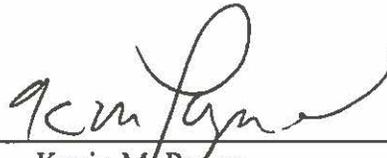
ATTACHMENT C
Senior Officer Affidavit

VERIFICATION

I am an officer of the corporation identified herein and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true and accurate.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of July, 2019, at Rosemead, California



By: Kevin M. Payne
President and Chief Executive Officer
SOUTHERN CALIFORNIA EDISON COMPANY
8631 Rush Street
Post Office Box 800
Rosemead, California 91770