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**Subject: Comments of the Public Advocates Office on the Office of Energy Infrastructure Safety's Draft 2022 Safety Culture Assessment Guidelines for Electrical Corporations.
Docket #: 2022-SCAs**

INTRODUCTION

Pursuant to the Office of Energy Infrastructure Safety's (Energy Safety) January 19, 2022, letter on the Public Comment Period for Draft 2022 Safety Culture Assessment Guidelines for Electrical Corporations, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these comments on Energy Safety's Draft 2022 Safety Culture Assessment [SCA] Guidelines for Electrical Corporations (Draft SCA Guidelines).

Cal Advocates recommends that Energy Safety incorporate revisions to the Draft SCA Guidelines to:

1. Avoid duplication of work with the California Public Utilities Commission (CPUC) on SCA proceedings.
2. Amend the SCA survey questions in order to:
 - Include both negative and positive statements in the survey to engage staff and reduce the risk of rushed completion.

- Allow respondents to provide comments after every survey question to capture further information.
 - Add non-multiple choice survey questions on internal communication at utilities to better understand the processes available for employees to raise safety concerns.
3. Expand the focus of the SCA survey to better understand the safety culture of contractors that are responsible for implementing much of the wildfire mitigation activities.
 4. Set stretch targets for the SCA survey response rates for utility employees and contractors to ensure a gradual improvement in sampling.

BACKGROUND

Public Utilities Code section 8389(d) requires the CPUC, in consultation with the Wildfire Safety Division (WSD) (now Energy Safety),¹ to adopt and approve several requirements related to catastrophic wildfire risk by December 1, 2020, and annually thereafter.² For example, the CPUC must adopt performance metrics, requirements for wildfire mitigation plans (WMPs), and a process for conducting annual safety culture assessments.³

On January 19, 2022, pursuant to Public Utilities Code section 8389(d), Energy Safety released Draft 2022 Safety Culture Assessment Guidelines for Electrical Corporations (Draft SCA Guidelines) containing the guidelines for the second annual SCA process. Energy Safety requested parties file comments no later than February 8, 2022.

¹ The Wildfire Safety Division (WSD) transitioned from the California Public Utilities Commission (CPUC) to the Office of Energy Infrastructure Safety (Energy Safety) at the California Natural Resources Agency (CNRA) on July 1, 2021.

² On November 30, 2020, the Wildfire Safety Division (WSD) issued Resolution WSD-011, which implements the requirements of Public Utilities Code Section 8389(d). The Draft Resolution included guidelines for the annual safety culture assessment process. The first SCA Requirements of Electric Corporations was released on January 22, 2021, by WSD which is considered the baseline guidelines for SCAs.

An update to Resolution WSD-011 was adopted by the CPUC in Resolution M-4860 on December 2, 2021, which adopted Energy Safety's recommendations on (1) performance metrics for electrical corporations, (2) additional requirements for wildfire mitigation plans, (3) wildfire mitigation plan compliance process, and (4) a process for Energy Safety to conduct annual safety culture assessments for each electrical corporation

³ Public Utilities Code sections 8389(d)(1), (2), (4).

RECOMMENDATIONS

1. Energy Safety should avoid duplication of work with the CPUC on SCA proceedings.

The Executive Summary of the Draft SCA Guidelines⁴ states that Energy Safety and the CPUC strive for coordination such that assessments⁵ may be complementary and mutually informative. Cal Advocates supports this goal and recommends that Energy Safety and the CPUC explore processes that pave the way for minimal duplication, specifically, in relation to Rulemaking (R.) 21-10-001.⁶ In R.21-10-001, which was initiated on October 7, 2021, the CPUC is exploring ways that the safety culture assessment process can be complementary to, and not duplicative of the annual safety culture assessments conducted by Energy Safety.⁷ Additionally, Energy Safety could benefit from reviewing the recent Independent Safety Culture Assessment of Southern California Gas Company and Sempra Energy prepared by an independent consultant, Evolving Energy Consortium (the 2EC Report).⁸

2. Energy Safety should amend the survey questions and design in its Draft SCA Guidelines, the following ways:

- (a) Energy Safety should include both negative and positive statements in the survey to engage utility staff and reduce the risk of rushed completion.**

Within the proposed workforce survey questions, Energy Safety provides examples of survey questions regarding wildfire safety, personal safety, and overall culture.² These are currently presented only as positive statements to the respondent, requesting a rating on a scale of 1-5 on how strongly respondents agree with the statement. Such a style for self-assessments is more likely to lead to complacency and reduced engagement by the respondent, and result in inaccurate responses, thereby masking organizational blind

⁴ Draft SCA Guidelines, p. 3.

⁵ Assessments referenced include the Energy Safety's annual Safety Culture Assessment and the Commission's five-year safety culture assessment required by Public Utilities Code Section 8386.2.

⁶ Order Instituting Rulemaking to Develop Safety Culture Assessments for Electric and Natural Gas Utilities, October 7, 2021 (OIR).

⁷ OIR, p. 7.

⁸ Order Instituting Investigation on the Commission's Own Motion to Determine Whether Southern California Gas Company's and Sempra Energy's Organizational Culture and Governance Prioritize Safety (I.) 19-06-014. The 2EC Report was provided on January 13, 2022 and is available here: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M440/K090/440090725.PDF>

² Draft SCA Guidelines, pp.12-13.

spots in the safety culture assessment.¹⁰ In addition, the survey questions are presented in a positive bias form where the questions are phrased in a manner indicating how things should be, possibly risking that the questions are leading.¹¹ This phrasing could result in staff leaning towards a higher rating for each statement, producing skewed and misleading results.¹² Cal Advocates recommends Energy Safety employ a varied approach where positive and negative statements are presented. Such a strategy will help keep respondents more engaged, avoid complacency, and potentially attain more accurate results. Survey statements such as “I feel comfortable discussing wildfire hazards with my supervisor”¹³ could be rephrased to the negative form and read as “I do not feel comfortable discussing wildfire hazards with my supervisor.” Respondents would still be able to provide their response according to the degree they agree with the statement.

(b) Energy Safety should require that each survey question allow options for respondents to provide comments.

The current design of the workforce survey questions does not allow for additional comments. Comments are an important and common element of safety culture surveys.¹⁴ They capture critical information not otherwise captured that may be used to drive corrective actions and to improve future surveys. For example, a respondent could think the organization is performing highly, but could perform even better if a recommendation they made in comments was adopted. Cal Advocates recommends that Energy Safety include this additional feature in its workforce surveys.

(c) Energy Safety should add non-multiple choice survey questions on internal communication at utilities to better understand the processes available for employees to raise safety concerns.

In general, Energy Safety should add more questions going to how employees provide feedback regarding wildfire and personal safety concerns to their supervisors and upper management. Currently, there are around six survey questions that address communication. These six questions are also phrased positively and are possibly

¹⁰ See David L. Vannette and Jon A Krosnick’s “Answering Questions, A Comparison of Survey Satisficing and Mindlessness.” <https://pprg.stanford.edu/wp-content/uploads/2014-Mindlessness-Chapter.pdf>

¹¹ A leading question is a type of question that pushes respondents to answer in a specific manner, based on the way they are framed. More than often, these questions already contain information that survey creator wants to confirm rather than try to get a true and an unbiased answer to that question.

¹² The Pew Research Center’s “Questionnaire design.” <https://www.pewresearch.org/methods/u-s-survey-research/questionnaire-design/>

¹³ Draft SCA Guidelines, p. 12.

¹⁴ <https://www.smartsurvey.co.uk/blog/the-benefits-of-adding-a-comments-box-to-your-survey-design#:~:text=By%20including%20a%20survey%20comment,to%20send%20them%20out%20again>

leading.¹⁵ There should be further questions, including negatively phrased questions, to help improve the survey results.

Energy Safety should also add more non-multiple-choice questions that solicit comments about internal communications at utilities. As an example, Energy Safety could require utilities to ask a neutral non-multiple choice survey question regarding how employees raise safety concerns to their supervisors,¹⁶ how often they have raised any safety concerns, whether their concern was followed up on and raised to upper management (if necessary), whether they feel comfortable raising safety concerns, and if they do not feel comfortable raising safety concerns, why they are not comfortable doing so. This format better facilitates understanding of the respondent's experience of safety reporting at utilities and whether they feel comfortable raising issues. In addition, this format better facilitates understanding of how top-level executives in charge of designing the safety framework receive feedback from front-line employees once it is established. In the recent 2EC report, survey respondents at Southern California Gas Company indicated in their comments that they felt a sense of embarrassment or harassment from supervisors when reporting safety concerns, which is a critical finding that resulted from asking this question in an open-ended neutral manner.¹⁷

3. Energy Safety should expand the focus of the SCA survey to contractor employees.

The current target population for the workforce survey is employees, supervisors, managers, and contractors who are engaged in wildfire hazard mitigation activities.¹⁸ Cal Advocates supports the inclusion of contractors in the workforce surveys, as contractors play an important role in executing wildfire mitigation activities and experience firsthand wildfire safety concerns in the field.¹⁹ However, as seen in Pacific Gas and Electric Company's (PG&E's) 2021 Safety Culture Assessment issued by Energy Safety on October 6, 2021, the contractor survey response rate was only 1.8 percent, which does not provide meaningful insight into the safety culture of those contractors who were involved in executing much of PG&E's wildfire mitigation activities.²⁰ Cal Advocates

¹⁵ Draft SCA Guidelines, pp. 12-13.

¹⁶ Multiple choice responses could include email, virtual meetings, in-person meetings etc.

¹⁷ 2EC Report, p. 32.

¹⁸ Draft SCA Guidelines, p. 8.

¹⁹ For example, Pacific Gas and Electric Company (PG&E) contracts with third-party arborists to undertake a significant amount of vegetation management activities. See PG&E's 2021 Wildfire Mitigation Plan, p. 242. "While PG&E has started employing internal pre-inspectors, they comprise less than 1 percent of the [Vegetation Management] workforce. Training requirements are the same for both internal and contracted pre-inspectors." *Id.*

²⁰ PG&E 2021 Safety Culture Assessment, p.7. "Survey responses were received from 165 PG&E contractor employees out of an estimated base of 9,000 contractor employees."

recommends that Energy Safety develop further guidance on the extent to which contractors should participate in the SCA surveys.

4. Energy Safety should encourage higher target response rates for utilities' employees and contractors.

Energy Safety's 2021 SCAs showed that utilities achieved a varying response rate to the surveys. For example, the response rate from San Diego Gas & Electric Company's employees was 80%,²¹ whereas PG&E employees had only a 20% response rate.²² The response rate was even lower for PG&E's contractors at only 1.8%.²³

This compares to the 2EC Report, which had a response rate of 85% for Southern California Gas Company Employees, and 38% for contractors.²⁴ Energy Safety should develop minimum target response rates for utilities' employees and its contractors (workforce) to ensure that responses accurately represent the workforce population and improve coverage of the workforce over time.

One method to increase survey participation rates would be to incentivize supervisors and managers to make the survey more accessible to the workforce and reach a target response rate in their respective areas of responsibility.²⁵ For example, employers could be required to provide workforce respondents dedicated time during the workday to complete the survey in an area free from external pressures such as a supervisors or colleagues.

<https://energysafety.ca.gov/wp-content/uploads/2021-sca-report-pge.pdf>.

²¹ Office of Energy Infrastructure Safety Issuance of San Diego Gas & Electric Company's 2021 Safety Culture Assessment per Public Utilities Code Sections 8389(d)(4), p. 7. <https://energysafety.ca.gov/wp-content/uploads/2021-sca-report-sdge.pdf>.

²² Office of Energy Infrastructure Safety Issuance of Pacific Gas and Electric Company's 2021 Safety Culture Assessment per Public Utilities Code Sections 8389(d)(4), p. 7. <https://energysafety.ca.gov/wp-content/uploads/2021-sca-report-pge.pdf>.

²³ Office of Energy Infrastructure Safety Issuance of Pacific Gas and Electric Company's 2021 Safety Culture Assessment per Public Utilities Code Sections 8389(d)(4), p. 7. <https://energysafety.ca.gov/wp-content/uploads/2021-sca-report-pge.pdf>.

²⁴ 2EC Report, p. 20.

²⁵ A helpful calculator to determine the number of respondents and subsequent responses needed to get statistically significant results can be found on the web. CheckMarket by Medallia. <https://www.checkmarket.com/sample-size-calculator/>.

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CONCLUSION

Cal Advocates respectfully requests that Energy Safety adopt the recommendations discussed herein. Please contact Lucy Morgans (lucy.morgans@cpuc.ca.gov) or Talal Harahsheh (talal.harahsheh@cpuc.ca.gov) with any questions relating to these comments.

Sincerely,

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