

December 18, 2020

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Re: Comments of the California Association of Small and Multi-Jurisdictional Utilities on the Draft Safety Culture Assessment Requirements of Electrical Corporations

In accordance with the December 3, 2020 letter from Wildfire Safety Division (“WSD”) Director Thomas Jacobs for the Draft Safety Culture Assessment Requirements of Electrical Corporations (“Draft SCA”), Bear Valley Electric Service, Inc. (“BVES”), Liberty Utilities (CalPeco Electric) LLC (“Liberty CalPeco”), and PacifiCorp, d.b.a. Pacific Power (“PacifiCorp”) (collectively, the California Association of Small and Multi-Jurisdictional Utilities (“CASMU”)), submit these comments on the Draft SCA. As outlined in the December 3, 2020 letter from WSD Director Thomas Jacobs, CASMU submits these comments to provide “input on which elements of the SCA would best apply to Small and Multijurisdictional Electrical Corporations (SMJUs).”¹ As described more fully below, CASMU is generally supportive of the Draft SCA and believes the Draft SCA appropriately applies elements of the SCA to the SMJUs. Additionally, CASMU requests that in evaluating workforce surveys the WSD consider impacts to survey results based on the small sample sizes of the CASMU members.

I. Introduction and Background

Although the CASMU members are electric utilities, they differ significantly from California’s largest investor-owned utilities, Pacific Gas and Electric Company, Southern California Edison Company (“SCE”), and San Diego Gas & Electric Company (collectively, the

¹ December 3, 2020 letter to stakeholders to 2021 safety culture assessments from WSD Director Thomas Jacobs, p. 1.

“Large IOUs”). The CASMU utilities are significantly smaller than the Large IOUs. As described below, each CASMU member has less than 50,000 customers, and disproportionate administrative costs are a more significant burden for a smaller number of customers.

Utility planning efforts as well as participation in Commission proceedings is conducted and handled by significantly smaller staff for the CASMU members than at the Large IOUs. For example, BVES currently has 52 employees and approximately 24,000 customers, and Liberty CalPeco has approximately 100 employees and approximately 49,000 customers. Compared to SCE’s 12,720 employees for its 5.15 million customers,² BVES and Liberty CalPeco, respectively, have approximately 0.4% and 0.8% of the workforce to meet any Wildfire Mitigation Plan- (“WMP”) related requirements and 0.5% and 1% of the customer base from which to recover administrative costs. PacifiCorp, with approximately 45,000 California customers, has approximately 0.9% of SCE’s customer base from which to recover administrative costs.

The California Public Utilities Commission (“Commission”) has traditionally recognized the significant differences between the CASMU utilities and the Large IOUs and has routinely found that “the small size of [CASMU members] and the nature of their operations” make it inappropriate and burdensome for the Commission to impose certain requirements on CASMU members or require that the Commission allow CASMU members to take a more limited approach than that required for the Large IOUs.³ The Commission has noted that imposing certain planning requirements on CASMU members “would only impose costs and inefficiencies on these small IOUs.”⁴ Similarly, the Commission has recognized that CASMU members may be at different stages than the Large IOUs with regard to infrastructure deployment or other

² These numbers are based on SCE’s 2019 Financial & Statistical Report, available at <https://www.edison.com/content/dam/eix/documents/investors/sec-filings-financials/2019-financial-statistical-report.pdf>.

³ See, e.g., D.09-12-0465, at 2 (exempting CASMU members from certain smart grid-related requirements).

⁴ D.09-12-046, at 27; see also D.08-05-028 (granting CASMU members the ability to file less complex annual procurement plans or to use the integrated resource plans they file in other states).

initiatives and so meeting certain standards “could be overly burdensome on [a CASMU member’s] small ratepayer base.”⁵

As described more fully below, CASMU believes that the Draft SCA appropriately accounts for these differences from the Large IOUs in outlining SCA requirements. However, CASMU believes that additional consideration should be provided to CASMU member survey results, given the small sample sizes that are likely to make up the CASMU members’ workforce surveys.

II. Comments on Draft SCA

A. Requirements of Electrical Corporations

1. The Draft SCA Appropriately Applies Elements of the SCA to the SMJUs

The December 3, 2020 letter from WSD Director Thomas Jacobs requests that the CASMU members provide “input on which elements of the SCA would best apply to Small and Multijurisdictional Electrical Corporations (SMJUs).”⁶ The Draft SCA appears to recognize the distinctions between the CASMU members and the Large IOUs, determining that “[n]ot every requirement” should apply to the CASMU members. Specifically, the Draft SCA determines that the SMJUs need not provide the following:

- Self-Assessment and Plan Survey⁷
- Certain Supporting Documentation:
 - Summary Plan⁸
 - Documentation to Support Responses to Organizational Self-Assessment⁹

⁵ D.09-12-046, at 50; *see also* D.04-02-044 and D.03-07-011 (decisions granting Sierra Pacific Power Company, now Liberty Utilities, and PacifiCorp, an exemption from filing long-term procurement plans).

⁶ December 3, 2020 letter to stakeholders to 2021 safety culture assessments from WSD Director Thomas Jacobs, p. 1.

⁷ Draft SCA, p. 6.

⁸ Draft SCA, p. 7. The Summary Plan is addressed as item 3 of Section 1.4.2 of the Draft SCA.

⁹ Draft SCA, p. 7. The documentation to support responses to organizational self-assessment is addressed as item 4 of Section 1.4.2 of the Draft SCA.

CASMU believes that in recognition of the unique characteristics and small sizes of the CASMU members, the Draft SCA appropriately assigns requirements to the SMJUs.

2. The Final SCA Should Clearly Specify Which Requirements Apply to Which Electrical Corporations

CASMU appreciates the clarity provided in the Draft SCA and recommends that the same clarity be included in the final SCA. According to the Draft SCA, “[n]ot every requirement will apply to every electrical corporation.”¹⁰ The Draft SCA then provides a clear overview of which SCA requirements apply to which electrical corporations.¹¹ This same clarity, as well as the rationale justifying why requirements do or do not apply to different utilities, should be included in the final SCA to ensure that utilities fully understand applicable requirements and can timely comply with such requirements.

B. Workforce Survey

1. Target Population – Given the Small Sizes of the CASMU Members, Survey Sample Sizes Will Be Inherently Smaller and May Lead to Less Accurate or Skewed Survey Results

The Draft SCA provides that the “targeted population for the workforce survey is those employees, supervisors, managers and contractors who are engaged in wildfire hazard mitigation activities.”¹² Given the small sizes of the CASMU members and the correspondingly small number of employees, supervisors, managers, and contractors who are engaged in wildfire hazard mitigation activities, the workforce surveys for the CASMU members are likely to be based on a small sample size. While survey results from a small sample size are not inherently problematic, a smaller survey size necessarily means a smaller number of opinions can impact the accuracy and effectiveness of a survey. For example, the chances of skewed results can significantly increase the smaller the size of the survey group.

The Draft SCA uses “a lineperson who is working to install system hardening infrastructure” as an example of the targeted population.¹³ Under this example, hypothetically, if

¹⁰ Draft SCA, p. 6.

¹¹ Draft SCA, pp. 6-7.

¹² Draft SCA, p. 8.

¹³ Draft SCA, p. 8.

a small utility like BVES were to employ ten linepersons, one individual would provide 10 percent of the survey results. Any inaccuracies in completing surveys could significantly skew survey results.¹⁴ This is particularly true when trying to assess trends based on surveys. Accordingly, in evaluating workforce surveys, the WSD should take into account the sample size of the targeted population and consider whether the sample size may have contributed to less accurate survey results.

III. Conclusion

CASMU appreciates this opportunity to comment on the Draft SCA and looks forward to working with the WSD and interested stakeholders to further refine SCA requirements.

Respectfully Submitted,



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Service List for R.18-10-007

¹⁴ For example, incorrectly completing a survey, incomplete or omitted responses to a survey, or falsely responding to a survey (if, for example, a disgruntled or dissatisfied employee or contractor did not accurately complete a survey) is more likely to significantly alter survey results for a small sample size.