

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

Wildfire Safety Division
California Public Utility Commission

**COMMENTS OF THE GREEN POWER INSTITUTE ON
WSD SAFETY CULTURE ASSESSMENTS:
REQUIREMENTS OF ELECTRICAL CORPORATIONS**

December 18, 2020

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**COMMENTS OF THE GREEN POWER INSTITUTE ON
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Pursuant to the December 3, 2020, WSD Resolution and attached Safety Culture Assessment: Requirements of Electrical Corporations, the Green Power Institute, the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security (GPI), provides these *Comments of the Green Power Institute on WSD Safety Culture Assessments: Requirements of Electrical Corporations*.

GPI generally supports the proposed Safety Culture Assessment and requirements of electrical corporations with some modifications as discussed below, including: (i) Collect self-assessment metrics on SMJUs; (ii) Establish and publicize clear guidelines for safety culture best-practices to guide SMJU and ITO safety culture improvements; and (iii) determine if supporting documents are needed to substantiate self-assessment questions 2.1.1, 2.2.2 and 3.3.2.

Recommendations

GPI remains concerned that the small size of SMJUs and the resultant small data sets showing few if any near misses and ignition events is resulting in a false sense of security around wildfire risk and consequence in the SMJU territories. As we have previously pointed out, the small jurisdictions managed by SMJUs inherently result in seemingly isolated near miss and ignition incidents that, if taken at face value and compared to the large IOUs, appear to suggest that small utilities have less wildfire risk and few risk trends. We reiterate that these small data sets are inadequate to inform wildfire risk and trends since they do not provide sufficient data points or incidences on which to determine risk or risk trends with any statistical significance. In fact, it is possible, and perhaps likely that wildfire risk and consequence within the SMJUs is equivalent to that in the IOU territories, especially if the SMJU presides over territory classified as an HFTD. It follows that SMJUs, while typically held to more relaxed standards compared to the IOUs,

should still be held accountable for initiating and improving wildfire mitigation measures over time, including adopting a suitable safety culture.

The *Safety Culture Assessments: Requirements of Electrical Corporations* report elects to excuse SMJUs from completing the safety self-assessment on the basis that “A detailed assessment of organizational systems is likely most appropriate for larger, more complex electrical corporations in 2021.” While we understand the general preference for applying requirements to “Large Utilities” and not SMJUs, it may be challenging for stakeholders and the public, as well as WSD review, to determine how SMJU safety culture measures up to best practices. It will also limit the ability to track if and how SMJUs improve their safety culture over time. Wildfire risk and risk mitigation efforts in SMJU territories should not be overlooked based on the inherently small near miss and ignition event data sets. GPI recommends SMJUs complete the safety self-assessment, but be relieved of submitting supporting documentation section 3 and 4 in order to reduce the regulatory burden. The safety self-assessment will: (i) provide a baseline and tracking methodology for SMJU safety culture; (ii) allow direct comparison to IOU safety culture; (iii) provide a basis for assessing how SMJUs align with WSD defined best-practices; (iv) support stakeholder and WSD review as well as public engagement and transparency. These are reasonable given that SMJUs are not exempt from wildfire risk and consequences, and may incur the same risk as the “Large IOUs” despite insufficient data to allow for a statistically robust risk analysis.

The Safety Culture Assessment plan also states:

The WSD seeks to develop a longitudinal view of safety culture across electrical corporations to identify best practices and relative gaps, along with an understanding of each electrical corporation’s relative strengths, weaknesses and approaches (Safety Culture Assessment: Requirements of Electrical Corporations, p. 3).

The GPI supports this plan and suggests adding a stipulation that the WSD will ultimately provide a definition of Safety Culture best-practices as it related to wildfire risk and consequence mitigation. This is needed in order to share lessons learned from the IOUs and WSD safety culture assessments with the smaller utilities and establish clear best-

practices methods for SMJUs and ITOs to adopt. Establishing and publishing defined wildfire-related safety culture best-practices may also contribute to California's position as a global leader in wildfire mitigation.

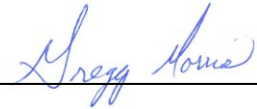
GPI also notes that the Table titled "Supporting evidence that could be requested by the WSD (Safety Culture Assessment, p. 31)" does not include documents that are referenced as capable of substantiating responses to three of the survey questions: 2.1.1 Who is accountable for wildfire safety outcomes?; 2.1.2 Who is accountable for personal safety outcomes?; and 3.3.2 What steps are taken to ensure frontline leaders and workforce can respond quickly to upset conditions? GPI recommends assessing whether supporting documents are needed to vet responses to these assessment questions, and if so, what documents would be required.

Conclusions

Holding all Utilities accountable for moving towards the adoption of wildfire risk mitigation best-practices, including the adoption of a safety culture, is important for ensuring risk is reduced in both large and small Utilities.

Dated December 18, 2020

Respectfully Submitted,



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