



February 8, 2022

Ms. Caroline Thomas Jacobs  
Director, Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, California 95814

Re: Pacific Gas and Electric Company—Draft 2022 SCA Guidelines Comments

Dear Ms. Thomas Jacobs:

Pacific Gas and Electric Company (“PG&E”) respectfully submits the following comments on the Office of Energy Infrastructure Safety’s (“Energy Safety”) January 2022 Draft Safety Culture Assessment Guidelines for Electrical Corporations (the “Draft Guidelines”).

PG&E views Energy Safety’s safety culture assessments as an important component of PG&E’s efforts to improve its safety culture and performance, and PG&E found the 2021 assessment process to be highly valuable. PG&E recognizes and appreciates the tremendous work that went into developing the program for 2021 and the Draft Guidelines. In general, PG&E finds the Draft Guidelines to be and clear straightforward.

PG&E’s only comments relate to the timing of safety culture assessments, which is not specified in the Draft Guidelines. In particular, PG&E asks Energy Safety to consider the following when setting the schedule for the assessments:

1. Notice: PG&E urges Energy Safety to provide significant advance notice before commencing a safety culture assessment. PG&E’s senior management, frontline supervisors, and other personnel devote substantial time and attention to the process, and this can be challenging to coordinate on short notice. PG&E experienced difficulties last year for this reason, as reflected in some of the statements in the 2021 Safety Culture Assessment.<sup>1</sup>
2. Cadence: PG&E urges Energy Safety to establish and adhere to a consistent schedule from one year to the next. A consistent cadence will allow utilities more readily to anticipate and plan for the safety culture assessments, will facilitate the efforts of utilities to incorporate the assessment process into their ongoing

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<sup>1</sup> See, e.g., Dekra Services, Inc., *Safety Culture Assessment, Pacific Gas and Electric Company*, at 8 (Oct. 2021) (stating that “time constraints” affected how interviews were conducted, and that “[t]he response rate among PG&E employees was low”).

operations, and accordingly will minimize disruption of other ongoing initiatives (e.g., wildfire mitigation efforts during fire season).

3. Management Self-Assessments: PG&E urges Energy Safety to conduct the Management Self-Assessment portion of the assessment process relatively late in the year (e.g., September). PG&E understands a purpose of the Management Self-Assessment to be to help “Energy Safety . . . track organizational culture over time,” including year-over-year improvement.<sup>2</sup> PG&E believes that it is important to conduct the Management Self-Assessment late in the year so that a utility has adequate time to make and demonstrate progress from the prior year, including progress on incorporating the findings of the prior year’s assessment.

PG&E thanks Energy Safety for its consideration of these comments, and looks forward to continued collaboration with Energy Safety going forward.

Sincerely,

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Diane Thurman  
Director - Business Operations  
Pacific Gas and Electric Company

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<sup>2</sup> Draft Guidelines at 15.