

February 8, 2022

Caroline Thomas Jacobs, Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's Comments on Draft 2022 Safety Culture Assessment Guidelines for Electrical Corporations

Dear Director Thomas Jacobs,

On January 19, 2022, the Office of Energy Infrastructure Safety (Energy Safety) issued the draft 2022 Safety Culture Assessment Guidelines for Electrical Corporations (Draft Guidelines) for public review. The Draft Guidelines provide an opportunity for comments and reply comments. Southern California Edison Company's (SCE's) comments on the Draft Guidelines urge Energy Safety to reject the inclusion of contractors in the annual safety culture assessments (SCAs) because while SCE maintains strict safety-related requirements for its contractors, SCE cannot reasonably be expected to control the safety culture of the various contractor organizations with which SCE has a working relationship.

1. DISCUSSION

The Draft Guidelines indicated that Energy Safety will require the large Investor-Owned Utilities (IOUs) and Small and Multi-jurisdictional Utilities (SMJUs) to participate in a workforce survey. The target population for the workforce survey consists of employees, supervisors, managers, and contractors who are engaged in wildfire mitigation activities.

SCE is invested in the safety of our contract workforce and demonstrates this by maintaining strict safety-related requirements for our contractors. For example, SCE requires Safety Tier 1 contractors—higher risk contractors whose work activities, without the implementation of appropriate safety measures, are potentially hazardous or life-threatening—to comply with our Health and Safety Handbook for Contractors. The Health and Safety Handbook for Contractors sets a framework for hazard assessment, mitigation, oversight, corrective action management, incident management, leader safety culture training, and continuous improvement. SCE also requires higher risk contractors to enroll their leaders in Leader Safety Culture training, which includes instruction on: leader safety roles and responsibilities; personal safety ownership; techniques to manage and assess risk; techniques to improve communication with peers and colleagues; the importance of speaking up regardless of position; understanding sphere of influence and

control in managing safety outcomes; learning over blame; and leadership tools to align attitudes and behaviors. Additionally, SCE hosts regular contractor safety forums where SCE shares safety culture and performance best practices with our contractors to promote building and sustaining a strong safety culture for contractors' employees.

In addition, SCE considers the contractors' safety record when selecting a contractor by classifying contractors based on their level of risk. For example, SCE classifies the higher risk work mentioned earlier as Safety Tier 1. Tier 2 work is routine contractual work that is not typically considered hazardous. Tier 1 contractors undergo a review and qualification by a third-party administrator, ISNetworld (ISN). ISN reviews and scores the contractor based on safety performance, programs, and culture. SCE has designed the grading criteria to emphasize the elimination of all serious injuries and fatalities. ISN's review of the contractor's safety performance and programs results in a classification of Qualified (meet or exceed SCE-established standards), Unqualified (does not meet SCE and/or industry standards) or, Conditional (historic safety performance below SCE and/or industry standard but qualified to perform work with a SCE approved safety improvement plan). Contractors who incur a fatality within the last three years must develop and implement a SCE-approved plan to reach conditional status. ISN will continue to monitor the contractor's safety performance and periodically revalidate its classification status for the contractor.

While SCE is dedicated to enforcing safety requirements and otherwise supporting safe practices for its contractors, SCE's contractors should bear primary responsibility for the implementation of these requirements, including the maturation of the safety culture of their organizations and the safety of their employees. Requiring contractors to meet certain eligibility requirements to contract with SCE and to maintain certain safety practices and training while performing work for SCE is distinct from overseeing the safety culture of the contract organization, in that the latter requires a significantly deeper, continuous management of the members of the organization that is not feasible for SCE to achieve. Findings from Energy Safety's safety culture assessment for SCE's contractors may not accurately reflect the safety culture at SCE, nor could SCE reasonably be held responsible for implementing and ensuring improvements in the safety culture changes for another company. To require SCE to be held responsible for contractor safety culture changes implies a greater ability to control the means by which contractors perform their work than SCE can reasonably be expected to exercise. Such a workforce is used precisely because it independently possesses the skills, knowledge, and supervision to carry out the tasks that it is hired to perform and to do so safely.

Therefore, while SCE promotes strong safety culture and has an established framework to support safe work practices for its contractors, including contractors in SCE's safety culture assessment is not appropriate and should not be adopted.

2. CONCLUSION

SCE appreciates the opportunity to submit these comments. If you have any questions, or require additional information, please contact me at michael.backstrom@sce.com.

Sincerely,

 //s//

Michael A. Backstrom

VP Regulatory Policy

Southern California Edison