

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**

11/19/18  
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Order Instituting Investigation on the  
Commission's Own Motion to Determine  
Whether Pacific Gas and Electric  
Company and PG&E Corporation's  
Organizational Culture and Governance  
Prioritize Safety.

I.15-08-019

**OFFICE OF THE SAFETY ADVOCATE REPLY COMMENTS ON THE  
PROPOSED DECISION OF ADMINISTRATIVE LAW JUDGE**

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November 19, 2018

In its reply to comments filed by The Utility Reform Network (TURN) and Pacific Gas and Electric Company (PG&E) to the proposed decision (PD), Office of the Safety Advocate (OSA) notes that the PD addressed several specific important concerns:

“We neither approve nor reject PG&E’s plans to implement the recommendations in the NorthStar Report. The recommendations for PG&E are clear, and PG&E is responsible for implementing them. While the Commission is heartened by PG&E’s apparent responsiveness to the recommendations in the NorthStar Report, the Commission is reserving its judgment whether PG&E has effectively implemented them. The Commission wants to confirm that PG&E has implemented the recommendations, rather than pre-bless PG&E’s plans for doing so. **Results are a higher priority than intentions.**” (Emphasis added)

...

“**This Commission wants PG&E to have a genuine and effective safety culture that permeates the organization, not just a thin veneer or window dressing that superficially looks good but fails under stress.**” (Emphasis added)

...

“This Commission fully supports safety-related issues being addressed in other appropriate proceedings, **but doing so does not obviate the need for this proceeding to continue.** This proceeding has a different and larger focus than other proceedings, and while the NorthStar Report has identified problems (and PG&E has plans to fix those problems), **we want to make sure that those problems are fixed (or at least farther along the road to being fixed) before closing this proceeding.**” (Emphasis added)

In part, TURN comments conclude that:

“The PD seems to be suggesting that recommendations such as the adoption of performance-based ratemaking and safety performance metrics and targets are beyond the scope of this phase of the proceeding, which is an error.”

OSA was generally in agreement with TURN’s specific recommendation to facilitate the adoption of safety performance metrics, safety culture metrics, and safety performance targets in this proceeding. OSA believes that is the intention of the Commission in this PD to keep the proceeding open to address that.

OSA would support added clarification in the PD and recommends that the Commission adopted the proposed edits in Appendix A.

Respectfully submitted,

/s/ CHRISTOPHER CLAY

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## Appendix A

### Finding of Fact

1. NorthStar prepared a report for the SED assessing PG&E's safety culture and making recommendations.

**<2. The Commission recognizes the importance of ensuring the safety problems that initiated this proceeding are addressed and that corrective actions are sufficient and are effectively implemented.>**

### Conclusions of Law

1. PG&E should promptly implement the recommendations set forth in the NorthStar Report.

2. PG&E should submit reports on the status of its implementation of the recommendations set forth in the NorthStar Report.

**<3. This an appropriate proceeding for the Commission to develop safety performance metrics and safety culture metrics to evaluate corrective actions.>**

### ORDER

IT IS ORDERED that:

1. Pacific Gas and Electric Company is ordered to implement the recommendations set forth in the NorthStar Report no later than July 1, 2019.

2. Pacific Gas and Electric Company is ordered to submit quarterly reports on the status of its implementation of the recommendations set forth in the NorthStar Report to the Commission's Safety Enforcement Division and to serve those reports to the service list for this proceeding, beginning the fourth quarter of 2018.

3. This proceeding remains open**<and will include the development of safety performance and safety culture metrics to evaluate corrective actions>**.