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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Develop Safety Culture Assessments
for Electric and Natural Gas Utilities.

Rulemaking 21-10-001

EMAIL RULING SEEKING COMMENTS ON PHASE 2 PARTY PROPOSALS

Dated February 11, 2026, at San Francisco, California.

/s/ Jack Chang

Jack Chang
Administrative Law Judge

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Subject: R.21-10-001 Email Ruling Seeking Comments on Phase 2 Party
Proposals

To the service list of Rulemaking 21-10-001:

**Administrative Law Judge's Ruling seeking comments on phase 2 party
proposals**

This email ruling sets a schedule for parties to file comments on Party Proposals for Conducting Safety Culture Assessments of Small and Multi-Jurisdictional Utilities and Gas Storage Operators submitted as part of Phase 2 of Rulemaking (R.) 21-10-001. This ruling also provides questions that parties should respond to in their comments on Party Proposals for Conducting Safety Culture Assessments of Small and Multi-Jurisdictional Utilities and Gas Storage Operators.

1. Procedural Background

On October 13, 2021, the Commission opened this Order Instituting Rulemaking (OIR) to develop and adopt a safety culture assessment framework for the regulated investor-owned electric and natural gas corporations as well as for the gas storage operators serving California. Additionally, this OIR was instituted to identify the structure, elements, and process necessary to drive each regulated investor-owned electric and natural gas utility and gas storage operator to establish and continuously improve their organization-wide safety culture. Accordingly, this OIR provided guidance on the form and content of the safety culture assessments for regulated electric and natural gas investor-owned utilities and gas storage operators, provided a venue for a review of their safety culture as an organization, and determined a process for ongoing review and refinement of their safety culture assessments in future years. The OIR named as respondents specific investor-owned utilities, small and multi-jurisdictional utilities, and gas storage operators.

The Commission approved Decision (D.) 25-01-031 on January 23, 2025, adopting a safety culture assessment framework for the large investor-owned utilities as part of Phase 1 of this proceeding. D.25-01-031 stated that “Phase 2 issues, which focus on developing Safety Culture Assessments for the small multi-jurisdictional utilities and gas storage operators, are not yet resolved.”

The Commission issued a Scoping Memo on August 26, 2025 establishing a general schedule for Phase 2 of this proceeding. An Administrative Law Judge (ALJ) ruling issued on November 24, 2025 allowed parties to file proposals for Conducting Safety Culture Assessments of Small and Multi-Jurisdictional Utilities and Gas Storage Operators by January 30, 2026. Eight parties responded to the ruling, with Wild Goose Storage and Lodi Gas Storage jointly filing, Bear Valley Electric Service, Liberty Utilities, and PacifiCorp jointly filing, Central Valley Gas Storage, and Alpine Natural Gas Operating Company filing safety culture assessment proposals. Small Business Utility Advocates also filed comments in response to the ALJ Ruling. The Commission held a virtual workshop to discuss these proposals on February 6, 2026.

2. Party Comments and Proposals

Parties may file written comments on party proposals and comments submitted in response to the November 24, 2025 ALJ ruling no later than March 11, 2026. Party comments should address the following questions:

1. If the Commission adopted a third party-led safety culture assessment framework, how could it be scaled to match the organizational resources and structures of small and multi-jurisdictional utilities and gas storage operators?
2. How could a self-assessment model for conducting safety culture assessments be supported with appropriate internal capacity and implemented to ensure objective and effective safety culture assessments of small and multi-jurisdictional utilities and gas storage operators? Is there any level of external support that might be useful for implementation of safety culture self-assessments?
3. What would a peer review model for safety culture assessments require in terms of resources and capacity to implement and how could such resource and capacity needs be addressed?
4. How could the Commission's safety culture assessment framework for small and multi-jurisdictional utilities avoid duplication with annual safety culture assessments required by the Office of Energy Infrastructure Safety?
5. How could small and multi-jurisdictional utilities and gas storage operators share the costs of conducting third party-led safety culture assessments? How should the cost share be calculated for each small and multi-jurisdictional utility or gas storage operator?
6. If gas storage operators were not responsible for costs associated with safety culture assessments, how should those costs be recovered?

Reply comments must be filed and served by March 18, 2026.

IT IS RULED that:

1. Phase 2 party comments on Party Proposals for Conducting Safety Culture Assessments of Small and Multi-Jurisdictional Utilities and Gas Storage Operators shall be filed and served by March 11, 2026.
2. Phase 2 party reply comments on Party Proposals for Conducting Safety Culture Assessments of Small and Multi-Jurisdictional Utilities and Gas Storage Operators shall be filed and served by March 18, 2026.

The Docket Office Shall Formally File This Ruling.

Best,

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Administrative Law Judge
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