

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**

05/28/19  
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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.

Investigation 15-08-019

**OPENING COMMENTS OF THE OFFICE OF SAFETY ADVOCATE  
ON THE PROPOSED DECISION**

Pursuant to Rule 14.3 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure (Rules), the Office of the Safety Advocate (OSA) hereby files these Opening Comments on the May 7, 2019 Proposed Decision (PD) for Order Instituting Investigation (I).15-08-019. OSA requests that the Commission modify the PD to allow parties to comment on Pacific Gas & Electric Company's (PG&E) compliance filing.

The PD seeks certain additional information from PG&E.<sup>1</sup> Specifically, the PD seeks the following information from the board members:

- 1) Any safety-specific education and training received, including any education or training relating to corporate safety culture or safety management programs, with dates, provider and any certifications.
- 2) All direct, supervisory or management level safety-specific work experience, including all experience with corporate safety culture or safety management programs, with dates, job title, and including both general job duties and safety-specific job duties.
- 3) All safety-specific board of direct or experience, including specific safety committees served on, dates of service, the scope of committee jurisdiction, and any experience relating to corporate safety culture or safety management programs.
- 4) All other previous and current board positions at other organizations, including dates, names of companies, and any special duties or offices.

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<sup>1</sup> PG&E and PG&E Corp. will provide the information.

5) All other current professional commitments, including employment, consulting or other contract work, and any significant and ongoing volunteer work.

The PD seeks the above information through a compliance filing by PG&E within 20 days of the issuance of the Commission's final decision.

Safety experience and qualifications of board members are essential to implement the North Star Report and to achieve the safety goals and standards of this proceeding. The Commission will make important determinations of whether PG&E's appointment of the board of directors is consistent with safety standards. It is important for parties to have input on PG&E's information that the Commission will rely on to make vital safety decisions. As with any Commission proceeding, parties have the right to comment or test the veracity of the facts that the Commission may use to make any decisions or conclusions. The PD, however, does not provide a method for parties to comment on the information PG&E will provide. The PD must provide parties the opportunity to comment on any additional information from PG&E.

Therefore, OSA requests that the PD be modified to give parties the opportunity to comment on any additional information the Commission needs to determine whether the PG&E's appointment of its board of directors is consistent with Decision 18-11-050. While OSA asks for a 30 day commenting period, OSA is flexible on the dates for the commenting period for PG&E's compliance filing.

Respectfully submitted,

/s/ RASHID A. RASHID

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## **APPENDIX**

### **Proposed Conclusion of Law (addition)**

3. Parties shall be provided an opportunity to comment on PG&E's Compliance Report. Comments shall be due within 30 days after PG&E submits its Compliance Report.