



Laura M. Fulton
Senior Counsel
8330 Century Park Court, CP32F
San Diego, CA 92123-1548

LFulton@SDGE.com

February 1, 2024

VIA E-MAIL

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

RE: SDG&E's Quarterly Notification Pursuant to Public Utilities Code section 8389(e)(7)

Docket #2023-SC

Dear Director Thomas Jacobs:

Pursuant to Public Utilities Code Section 8389(e)(7) and the June 2023 Office of Energy Infrastructure Safety's (Energy Safety) Safety Certification Guidelines,¹ San Diego Gas & Electric Company (SDG&E or the Company) hereby submits to the Office of Energy Infrastructure Safety (Energy Safety) this notification detailing the implementation of (1) SDG&E's approved Wildfire Mitigation Plan (WMP), (2) implementation of the recommendations of the Company's most recent safety culture assessment, (3) a statement of the recommendations of the Board of Directors Safety Committee (Safety Committee) meetings that occurred during the quarter, and (4) a summary of the implementation of prior Safety Committee recommendations.

I. BACKGROUND

Governor Newsom signed Assembly Bill (AB) 1054 into law on July 12, 2019. AB 1054 contains numerous statutory provisions and amendments designed to enhance the mitigation and prevention of utility-related catastrophic wildfires in California and promote utility financial stability, including the creation of the safety certification process. Public Utilities Code Section 8389(e) established the requirements the electrical corporations to receive an annual safety certification,² which, among other things, include an approved WMP and implementation of the initiatives therein, the establishment of a safety committee of the electrical corporation's board of directors, board-of-director-level reporting to the Commission on electrical system safety, and the

¹ Energy Safety's Safety Certification Guidelines provides guidance on the contents, format, and timing of the compliance reporting Energy Safety requires of the electrical corporations.

² SDG&E received its safety certification from Energy Safety via a letter dated December 7, 2023.

submission of quarterly reports notifying Energy Safety and the Commission regarding WMP implementation and compliance with other AB 1054 requirements.

Specifically, Public Utilities Code Section 8389(e)(7) requires electrical corporations to file a notice of implementation of its approved Wildfire Mitigation Plan with Energy Safety “on a quarterly basis that details the implementation of both its approved wildfire mitigation plan and recommendations of the most recent safety culture assessment, and a statement of recommendations of the board of directors safety committee meetings that occurred during the quarter.” Section 8389(e)(7) also requires that the notification “summarize the implementation of safety committee recommendations from the electrical corporation’s previous notification and submission.” SDG&E’s Quarterly Notification for the fourth quarter of 2023 is contained herein.

II. DISCUSSION

1) Quarterly Information-Only Submittal to the CPUC

SDG&E is simultaneously submitting this quarterly notification to the California Public Utilities Commission as an information-only submittal via email to Executive Director Rachel Peterson at rachel.peterson@cpuc.ca.gov.³

2) Quarterly Progress Report on WMP Implementation

SDG&E tracks 39 quantitative targets proposed in its 2023-2025 Wildfire Mitigation Plan. SDG&E’s WMP initiatives are designed to mitigate the risk of wildfire due to a fault on the electric system and reduce the impacts of PSPS to customers. These mitigations are categorized across three categories within the WMP including Grid Design, Operations and Maintenance, Vegetation Management and Inspections, and Situational Awareness and Forecasting.

SDG&E’s primary system hardening initiatives, namely the installation of covered conductor and strategic undergrounding of electric distribution infrastructure provide risk reduction by reducing the likelihood of an ignition. To inform investment decision making and promote reduction of risk in fire-prone areas, SDG&E has mitigation programs to enhance its risk modeling and help prioritize infrastructure replacement and provide strategies and tools for real time decision making during emergency response or PSPS events.

SDG&E also has mitigations intended to reduce the impact of a wildfire in the event of an ignition, including high-definition cameras, ground and aerial fire suppression resources, and a fuels management program. Additionally, SDG&E has implemented measures to mitigate the customer impacts associated with PSPS events, including the installation of remote switches to limit the number of customers exposed to PSPS, the establishment of customer resource centers to support customers during PSPS events, and SDG&E’s customer outreach programs to promote both wildfire and PSPS preparedness.

A detailed update on SDG&E’s WMP initiative progress for the second quarter of 2023 is included in Attachment A. In summary, SDG&E has fire hardened 184 miles of its electric system, including 70 miles of undergrounding and 79 miles of covered conductor. SDG&E has completed all of its required detailed distribution inspections, detailed transmission inspections, and detailed

³ Public Utilities Code Section 8389(e)(7).

vegetation inspections for 2023. More information on these metrics can be found in SDG&E's Quarterly Data Report, also filed February 1, 2024.

3) Quarterly Progress Report on Implementing Safety Culture Assessment Recommendations

Pursuant to Public Utilities Code Section 8389(d)(4), Energy Safety issued its 2022 Safety Culture Assessment Report for SDG&E on May 8, 2023 (2022 SCA Report). The report details the assessment carried out by the National Safety Council (NSC), who worked to assess the safety culture of SDGE through management self-assessment as well as workplace surveys and interviews. The NSC generally concluded that SDG&E has exhibited continued commitment to advancing its safety culture maturity.”⁴

The 2022 SCA Report provided three recommendations for SDG&E:

1. SDG&E should continue to develop and implement actions to reduce barriers to prioritizing safety over job task goals. Leadership should consistently demonstrate to workers that safety is the top priority through communication, decision making, and taking action, especially when there is a short deadline or pressures to re-energize to reduce the customer impact of outages.
2. SDG&E should continue to recognize and mitigate the risk exposure posed by interactions with the public. Frontline workers feel supported in walking away from jobs where interactions with the public pose threats to the crew, but the risk remains a significant concern for SDG&E workers.
3. SDG&E should continue to build on its efforts to track trends in safety event-related reporting, specifically tracking the quality of near-miss investigations and addressing gaps in its Ignition Management Program.

On June 15, 2023, SDG&E agreed to implement all of the findings and recommendations from its 2022 SCA Report.⁵ As stated in SDG&E's Request for a 2022 Safety Certification⁶, SDG&E “is continually working to promote innovation and enhancement in its safety culture.”⁷ To highlight its efforts to implement the recommendations of its most recent safety culture assessment, SDG&E continues perform activities to implement the 2021 and 2022 safety culture assessment reports through various methods, including but not limited to the following:

⁴ 2022 SCA Report at p. 3.

⁵ *Agreement of San Diego Gas & Electric to Implement the Findings of the 2022 Safety Culture Assessment, June 15, 2023* (Energy Safety Docket # 2022-SCAs).

⁶ *San Diego Gas & Electric Company's Request for a 2022 Safety Certification Pursuant to Public Utilities Code Section 8389*, submitted September 9, 2022.

⁷ *Id.* at 10.

- Leadership site visits and listening sessions.
- Monthly Electric Safety Subcommittee meetings where employees can raise and discuss safety topics that are documented and tracked through resolution.
- Operational managers and supervisors communicating and educating workers on the safe behaviors associated with mitigating hazards from wildfires and hostile interactions with discontented members of the public.
- Updating SDG&E's safety observation checklists to identify safe and at-risk behaviors associated with mitigating hazards from wildfires.
- Safety advisors hosting meetings with groups who are likely to have interaction with members of the public and providing public safety training refreshers.
- Expansion of SDG&E's near miss reporting application to capture wildfire-related risks and risks posed by discontented members of the public.
- Hosting company-wide psychological safety town hall events and manager training workshops to educate and promote a culture of safety and trust.
- Chief Safety Officer performing on-site safety visits (rotating district locations) with direct employee engagement, and monitoring interactions and feedback.
- District leadership (Directors, Managers) performing on-site safety visits (rotating district locations) with direct employee engagement; tracking interactions and feedback.
- District leaders holding safety all-hands meetings to clarify and set safety expectations to advance the safety culture.
- Executive Safety Council (ESC) soliciting feedback from front-line operational employees and supervision on safety culture.

Additionally, SDG&E reports the following activities performed specifically to implement the 2022 Safety Culture Assessment Report recommendations:

Implementation of Recommendation 1

- SDG&E's Chief Operating Officer/Chief Safety Officer continued issuance of weekly employee-wide communications highlighting weekly safety performance, lessons learned, key safety reminders, and reinforcing leadership's commitment to safety.
- On January 4, 2024, SDG&E's Chief Executive Officer issued an employee-wide communication outlining our key priorities for 2024, including "safety and best-in-class operations."
- On January 19, 2024, SDG&E held its second annual "Start Strong Safety Event" where approximately 1,400 field and represented workforce were transported to an offsite conference facility for a half day event focused on our 2023 safety achievements and our 2024 safety goals and expectations. SDG&E executives demonstrated their leadership commitment to continually advancing our safety performance and safety culture by identifying available resources to help employees be mentally and physically fit to safely perform work.

Implementation of Recommendation 2

- SDG&E leadership continues to emphasize the importance of “Stop the Job” whenever an unsafe condition is perceived. Instances of stopped work are recognized during Safety Committee meetings.
- SDG&E continues to mature its Field Service Delivery organization formed in 2022. Field Service Delivery is focused on enhancing the way our company conducts field work by optimizing processes, resources, and technology from the point of job intake and design through job execution in the field. This includes gas and electric service-order based jobs, such as transformer change-outs, gas pipe replacements and meter replacements. The primary objective is to provide a safe, easy, and modern field service experience for customers and employees.
- SDG&E continues to advance deployment of its Geocall Electric Pre-Construction Mobile Fielding Application launched on Oct. 31, 2022. The Geocall application is a leading-edge technology solution used to coordinate and optimize end-to-end field service processes, activities, and resources. The application is used by SDG&E’s Electric Regional Operations Construction Supervisors and back-office team members to digitally capture job requirements, including identification of potential safety concerns during pre-construction field work. The application integrates with GIS maps to include customer warning notifications (e.g., aggressive dogs, access codes, hostile persons) and includes opportunity for crews to include prerequisite and post completion notes.

Implementation of Recommendation 3

- SDG&E deployed enhancements to its company-wide Safety Dashboard – accessible to all SDG&E employees – to include (1) tracking of anonymous and non-anonymous Near Miss Report submittals as a leading safety culture indicator, and (2) status updates of reported Near Misses to provide increased feedback and follow-up to employees, including anonymous submitters.
- SDG&E continued issuance of a Weekly Near Miss Summary Report. This Report is sent to all SDG&E employees via e-mail on a weekly basis and provides high level data analysis to identify trends, including tracking on non-anonymous submittals, and highlights follow-up action items, safety reminders and key teachings.
- On January 16, 2024, an e-mail was issued to all employees highlighting the importance of Near Miss reporting as an opportunity to identify potential risks or hazards and proactively address them to prevent future incident or injury to our employees, contractors or customers and encouraging employees to submit non-anonymously to allow for improved follow-up.
- Specific to its Ignition Management Program, SDG&E continues to train employees on evidence of heat and find efficiencies with incident reporting. SDG&E has chosen to incorporate the notification and reporting requirements from OEIS regulation 2930 (Cal. Code Regs. tit. 14 § 2930) into our Ignition Management Program.

4) Board of Directors Safety Committee Recommendations

The SDG&E Board Safety Committee⁸ advises and assists the SDG&E Board of Directors in the oversight of safely providing electric and natural gas services to the Company's customers. The Safety Committee met on November 7, 2023, and heard presentations on the following topics:

Kevin Geraghty, SDG&E Chief Operating Officer and Chief Safety Officer, reviewed SDG&E's safety metrics, noting that while SDG&E remains one of the best utilities in California on safety metrics, the company still wants to keep improving and leading in safety. Mr. Geraghty discussed recent increases in controllable motor vehicle incidents, and company efforts to identify the reasons for such incidents and reduce at risk driving behaviors, including the use of telematics in vehicles and enhanced training.

Ben Gordon, SDG&E Chief Information Officer and Chief Digital Officer, provided a cybersecurity update. Mr. Gordon discussed recent cybersecurity incidents at other major companies and the significant damage that a cyber incident can cause. Mr. Gordon noted that SDG&E and its parent company, Sempra, continually assess SDG&E's cybersecurity strength and the company demonstrates strong cybersecurity awareness and preparation, according to third party assessments.

Kendall Helm, SDG&E Vice President for People and Culture, updated the Safety Committee on development of SDG&E's Incentive Compensation Plan (ICP) Safety Metrics for 2024.

Brian D'Agostino, SDG&E Vice President for Wildfire and Climate Science, discussed SDG&E's Wildfire Challenge Sessions for 2023. These sessions were designed to keep SDG&E's workforce engaged on wildfire safety and provoke new enhancements addressing wildfire risk. SDG&E conducted 26 sessions with approximately 750 employees, ultimately receiving over 232 individual ideas for exploration. After review of the sessions, SDG&E developed nearly 60 "double down" initiatives to follow up on during various timeframes. SDG&E also conducted a Wildfire Challenge Session with its Wildfire Safety Community Advisory Council to draw stakeholder feedback on where the company could target additional wildfire safety efforts.

4.1) Recommendations from the Most Recent Quarter

During the November 7, 2023 Board Safety Committee meeting, Rob Borthwick, Board Safety Committee Chair, recommended that, at an upcoming Safety Committee meeting, SDG&E report on the following:

- SDG&E report on the 2020 PacifiCorp Fires, including the alleged causes of the fires and efforts SDG&E has in place to reduce the likelihood of similar incidents, as well as the 2023 jury trial.

⁸ SDG&E's Board Safety Committee members include Robert J. Borthwick, Chair of the Board Safety Committee and Chief Risk Officer at Sempra; Karen Sedgwick, Chief Administrative Officer and Chief Human Resources Officer at Sempra; and Caroline A. Winn, SDG&E Chief Executive Officer.

4.2) Progress on Previous Recommendations

Currently pending Safety Committee recommendations include the following recommendations from previous meetings:

- Inspections of legacy gas transmission lines, and the Company's programs to address public safety during gas incidents (July 18, 2023, meeting);
- Report on the 2020 PacifiCorp fires (November 7, 2023, meeting).

SDG&E expects to fulfill these recommendations at an upcoming Board Safety Committee meeting and will provide updates on their completion in future quarterly notifications.

4.3) Implementation of Prior Committee Recommendations

Mr. D'Agostino's presentation on SDG&E's Wildfire Challenge Sessions during the November 7, 2023 Board Safety Committee meeting completed a prior recommendation from the July 18, 2023 meeting.

5) Update on SDG&E'S Wildfire Safety Community Advisory Council Meetings

Per the requirement established in D.20-05-051 that SDG&E report on advisory council activities on a quarterly basis, SDG&E's Wildfire Safety Community Advisory Council last met on November 3, 2023. The Wildfire Safety Community Advisory Council (WSCAC) is comprised of several important stakeholders in the SDG&E community and includes representatives from local and tribal governments, public safety partners, and Access and Functional Needs communities. The November 3, 2023 meeting was led by SDG&E COO and Chief Safety Officer Kevin Geraghty, and touched on several topics, including the following:

- SDG&E's new Wildfire and Climate Resiliency Center is scheduled to be fully completed in January 2024, providing SDG&E with leading-edge technology to support emergency operations and an innovative center for learning for the company and the community.
- SDG&E addressed the ongoing El Nino and the anomalous rainfall in August, which reduced overall fire danger heading into San Diego's peak Santa Ana Wind Season.
- SDG&E's PSPS Customer Impact Study, which incorporates data-driven recommendations to aid in understanding climate-driven customer impacts, enhance PSPS mitigation efforts, and advance support services to meet the needs of SDG&E's most vulnerable customers, including those who rely on uninterrupted power.
- The California Independent System Operator's approval of a slate of regional transmission upgrades to help the state achieve clean energy goals by facilitating renewable energy and energy storage projects.

Mr. Geraghty closed the meeting with a roundtable for feedback and comments.

III. NOTICE

This filing will be submitted to the Office of Energy Infrastructure Safety, the Executive Director of the California Public Utilities Commission, and posted to SDG&E's website (<https://www.sdge.com/2023-wildfire-mitigation-plan>).

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company