

Company: San Diego Gas & Electric Company
Application No.: A.22-10-____
Proceeding: Catastrophic Expense Memorandum Account (CEMA)
Exhibit No.: _____
Witness: Ron Kiralla

PREPARED DIRECT TESTIMONY OF
RON KIRALLA
ON BEHALF OF
SAN DIEGO GAS & ELECTRIC COMPANY

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



October 31, 2022

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**PREPARED DIRECT TESTIMONY OF
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6 **I. PURPOSE AND OVERVIEW**

7 **A. Purpose**

8 The purpose of this testimony is to present San Diego Gas & Electric Company's
9 (SDG&E or Company) response to the catastrophic event caused by the COVID-19 Pandemic as
10 stated in SDG&E's Application for Catastrophic Event Memorandum Account (CEMA). The
11 costs associated with the COVID-19 Pandemic can be found in the prepared direct testimony of
12 R. Craig Gentes.

13 **B. Pandemic Overview**

14 California Governor Gavin Newsom issued a COVID-19 State of Emergency
15 Proclamation on March 4, 2020, followed by the Governor's Stay Home Order on March 19,
16 2020. To align with these orders, SDG&E took steps to protect the safety of its employees and
17 reduce potential COVID-19 exposure and transmission in its business activities. On March 13,
18 2020, SDG&E instructed non-essential employees to work from their homes beginning
19 March 16, 2020, rather than report to the office.

20 SDG&E provides critical infrastructure services to its customers, and much of the work
21 that goes into providing those services cannot be done remotely. Activities such as equipment
22 maintenance, operations, and construction are activities that require employees to either be in the
23 field or at Company facilities while they perform their duties. To enable employees to safely
24 perform their duties, SDG&E took extraordinary measures to protect their health while they
25 carried out their critical tasks at Company sites.

1 While SDG&E has taken an all-hazards approach to emergency management, the
2 magnitude and health-related impacts associated with the COVID-19 pandemic warranted a
3 strategic approach to emergency preparedness and response. As new information becomes
4 available, SDG&E modifies and creates mitigation strategies, internal policies, and workforce
5 engagement efforts to remain compliant with the local, state, and federal guidelines.

6 A cross-functional return to workplace team was established with representatives from
7 across the Company to align and coordinate mitigation activities and facilitate employee
8 engagement. Although COVID-19 appears at present to be in decline, SDG&E will continue to
9 monitor the COVID-19 situation, adjust mitigation strategies, workforce communication, and
10 other policies and procedures to ensure alignment with industry-leading practices and applicable
11 government requirements.

12 SDG&E implemented various policies and programs to address and mitigate health and
13 safety concerns of the Company's employees and customers associated with the COVID-19
14 pandemic while continuing to provide safe and reliable energy services. These measures provide
15 continued safe working environments for SDG&E's office and field employees and are modified
16 as applicable based on federal and state guidelines as well as feedback from employees,
17 management, and union representation. The level and duration of these programs and activities
18 will continue to be adjusted to align with the warranted level of risk mitigation.

19 **II. 2020 PROGRAMS AND PROJECTS**

20 **A. Safety Consultant Support for Pandemic Exposure Safety at Customer** 21 **Homes**

22 To maintain a high level of safety and reliability with live customer interactions, SDG&E
23 modified several processes and procedures to mitigate the exposure to COVID-19 when SDG&E
24 employees enter customer homes. If there is potential COVID-19 exposure, a third-party safety

1 consultant is brought onsite to the customer’s location and assists the field technician(s) with
2 donning/doffing additional personal protection equipment (PPE).

3 **B. Procure Additional Supplies**

4 SDG&E is continuously monitoring applicable federal, state, and local guidance and
5 requirements to assess and purchase the necessary supplies and PPE to combat and minimize the
6 spread and impacts of the COVID-19 virus. Supplies include air filtration systems, disinfectant
7 cleaning supplies, face coverings, hand sanitizer, respirators, nitrile gloves, shoe coverings, and
8 coveralls. SDG&E incurred increased consumables and PPE costs for employee protection from
9 potential effects of COVID-19.)

10 **C. Temperature and pandemic symptom screening of**
11 **employees/contractors/visitors by vendor**

12 SDG&E coordinated with a vendor to conduct onsite temperature and pandemic
13 symptom screening of employees, contractors, and visitors at many Company locations every
14 day or nearly every day. This process was essential to reducing the risk of transmission in the
15 workplace and also was used as a tool to prompt employees to seek treatment and begin
16 quarantine sooner.

17 **D. Polymerase Chain Reaction (PCR) Testing and Sequestered Employees**

18 SDG&E incurred maintenance and repair costs for the setup of alternate work sites for
19 “sequestering” of key operational employees. SDG&E also arranged for a contractor to facilitate
20 offsite polymerase chain reaction (PCR) nasal swab testing of sequestered employees and onsite
21 antigen testing of select employee groups, as needed. PCR testing can determine if someone
22 currently has COVID-19 or other similar infection by detecting ribonucleic acid, or genetic
23 material, specific to the virus. It can detect the virus within days of infection, even for those who
24 have no symptoms. Direct access to testing helped to mitigate workplace exposure.

1 **E. Advanced/Enhanced Cleaning Protocols and Mechanical Systems for**
2 **Facilities**

3 SDG&E’s Facilities Operations Department implemented various enhancements to
4 provide additional safety measures to help maintain a healthy work environment. The measures
5 included equipment, signage, procedures, protocols, and communications.

- 6 • Specific equipment, including mitigating pathogen applications, such as
7 ultraviolet light and bipolar ionization units installed in heating, ventilation, and
8 air conditioning (HVAC) systems, have been procured.
- 9 • As necessary, spaces have been reconfigured to physically separate workers by at
10 least six feet using measures such as physical partitions or visual cues (*e.g.*, floor
11 markings, colored tape, or signs to indicate where workers should stand).
- 12 • Specific paths of travel (egress/ingress) have been developed, to reduce the cross-
13 contamination potential.
- 14 • Signage has been created to remind employees, the public, and customers of
15 physical distancing and face coverings protocols and placed at all facility
16 entrances and strategically throughout SDG&E facilities.
- 17 • Facilities employees continue to have daily or periodic touchpoints to discuss the
18 latest events, issues, and concerns with the state of the pandemic and as necessary,
19 implement appropriate measures during events.

20 SDG&E Facilities Operations Department also implemented a progressive multi-tier
21 protocol for addressing increased disinfection requirements due to a pandemic event.

- 22 • **Tier Zero** provided employees with cleaning supplies to clean their personal
23 workspace. Each organization/department has been responsible for obtaining and
24 making available the necessary cleaning products through the Company’s supply
25 process.
- 26 • **Tier One** provides the cleaning and disinfecting on a proactive and preventive
27 basis. Facilities Operations will disinfect specific areas of concern by utilizing
28 specific products to eliminate viral and biological pathogens. Protocols included
29 twice-daily cleaning of common surfaces.

- 1 • **Tier Two** is referred to as a “suspected COVID-19 exposure” and required (in
2 addition to Tier 1 protocols), cleaning and disinfecting personal workstations
3 including desktops, drawers, overhead cabinets, chairs, and armrests. Carpeted
4 floors will be cleaned with a HEPA vacuum and hard surface floors will be
5 mopped.
- 6 • **Tier Three** engages a specialized cleaning crew after a confirmed COVID-19
7 case has been identified. Depending on the situation, the crew will spray a liquid
8 disinfectant via an electrostatic process in exposed areas of the facility.

9 SDG&E Facilities Operations Department implemented various enhancements to its
10 heating, ventilation, and air conditioning (HVAC) systems to mitigate the potential for pathogen
11 propagation due to the pandemic event. Specifically, superior commercial air filters that capture
12 a vast majority of airborne pathogens as small as .03 microns were installed throughout the
13 Company’s HVAC systems. Where applicable, the maximum amount of outside air was
14 increased to improve indoor air quality and sequences of operations have been changed to
15 increase the amount of fresh air into spaces. Bi-polar ionization units have been installed in
16 SDG&E’s major air handling systems to electrically charge ions that neutralize airborne particles
17 in the ductwork, making them heavier and easier to trap in filters and cleaning the air stream.

18 In certain areas, SDG&E installed mobile air purification systems for 24/7 cleaning.
19 Mobile Ultra-Violet (UV) air purification systems were deployed to be used for areas with larger
20 populations that remained on-site and operational during heightened levels of the pandemic (*e.g.*,
21 Customer Care Centers and the Emergency Operation Center). Specific HVAC systems are
22 operated on a 24-hour basis to continuously circulate fresh air throughout the facility and
23 maintain indoor air quality. Janitorial costs were incurred for enhanced cleaning of facilities and
24 compliance with COVID-19 workplace disinfecting guidelines.

1 **F. Clean and Disinfect Company Owned and Operated Fleet Vehicles**

2 Safety and Fleet Services partnered to develop a comprehensive pandemic protocol for
3 the cleaning and disinfection of Company-owned and -operated vehicles and trucks. The
4 protocols also address situations when a single vehicle needs to be shared by multiple occupants.
5 To the extent feasible, vehicles are only occupied by a single individual, which resulted in Fleet
6 Services renting a number of additional vehicles, including associated additional cleaning costs.

7 **G. Pandemic-Related Applications, Systems and Licenses**

8 Pandemic-related application tools enable Employee Care Services (ECS) employees to
9 quickly assess the risk of potential COVID-19 exposures to other employees, facilities, vehicles,
10 or customers. These tools reduce the time it takes ECS staff to research and identify employee
11 interactions, initiate appropriate follow-up, assist ECS employees in managing and tracking
12 COVID-19 related cases and interactions with employees, and empower ECS employees to
13 proactively set relevant touchpoints, to reduce the risk of exposure and enhance employee safety.

14 For instance, SDG&E utilizes a Pandemic Dashboard and a Pandemic Analytics tool that
15 provide SDG&E's leadership with insight to the current pandemic environment and identify
16 trends to support decisions and policies. This dashboard tracks the impact of the pandemic
17 within SDG&E's service territory and in California, the U.S., and the world. At the Company
18 level, the tools track the impact the pandemic is having on SDG&E employees, including
19 confirmed and recovered cases, along with counts of employees in quarantine.

20 The Company has also used additional tools to enhance employee safety during the
21 pandemic, such as the Pandemic Case Management System, and Business Objects Contact
22 Tracing Report. SDG&E incurred increased costs for COVID-19 applications and VPN software
23 to maintain utility operations.

1 SDG&E has purchased, set up, and implemented supporting IT systems and software.
2 For example, SDG&E's IT Department has enhanced SDG&E's Virtual Private Network
3 software and has secured associated equipment and licenses to facilitate the increased work-
4 from-home (WFH) traffic. SDG&E incurred increased costs for COVID-19 applications and
5 VPN software to maintain utility operations.

6 **H. Contact Tracing Triage**

7 Complementary to other COVID-19 countermeasures, SDG&E uses a contact tracing
8 process to identify and notify employees and contractors who may have been in close contact
9 with a suspected or confirmed COVID-19 case while at work. Contracted resources have been
10 secured in this effort to conduct and deliver timely exposure notifications. These notifications,
11 along with mandated quarantines, reduce the risk of COVID-19 transmission in the workplace.

12 **I. Work Enablement**

13 To reduce the risk of COVID-19 transmission in the workplace, SDG&E has established
14 a new WFH policy and companion resources. For example, employees have been offered
15 reimbursement for home office supplies and a remote-work stipend to cover home expenses
16 incurred to facilitate WFH. Increased access to, and use of technologies has been implemented,
17 such as virtual conferencing, cloud-based file sharing, and remote access to secure systems and
18 databases. These policies, resources, and technologies to enable WFH has reduced the risks of
19 employees contributing to the spread of infections. Thus, SDG&E incurred telecommunicating
20 internet expense stipend towards cable/internet costs for employees who were required to work
21 at home in order to safely comply with COVID-19 distancing and safety directives.

22 **J. Alternate Work Sites**

23 SDG&E Facilities Operations implemented two different initiatives for sequestered
24 employees to provide social distancing and to minimize the spread of the COVID-19 virus. The

1 first initiative established various geographic reporting locations for some of the Company's
2 essential field employees. The locations consist of eleven separate sites that are spread
3 throughout the Company's service territory, providing an area for reporting in the mornings and
4 for dropping off vehicles, equipment, and materials in the evening, as needed. Physical fences,
5 security guards, cameras, and other security applications secured the sites. The sites also
6 provided temporary power (generators), temporary offices, lighting, water, ice, restrooms, hand
7 sanitation facilities, and trash services.

8 The second initiative involved renting recreational vehicles (RV) to house the Company's
9 essential transmission grid operations staff at the Mission Control Critical Facility. The
10 operators were sequestered on-site for two-week assignments and did not leave the premises.
11 The RVs included all utilities (electric, water, sewer) and housekeeping once a week.
12 Accordingly, SDG&E incurred maintenance and repair costs for setup of alternate work sites for
13 "sequestering" of key operational employees.

14 **K. Advisory Services and Expert Medical Consulting**

15 SDG&E identifies and retains infectious disease medical experts in an advisory capacity
16 to discuss mitigation strategies and workforce concerns and to interpret evolving federal, state,
17 and local guidance.

18 **L. Union Labor**

19 SDG&E incurs expense for union overtime needed in support of COVID-19 activities.
20 Additional expenses are incurred for over-time when employee must be on-site due to the March
21 25, 2020 union Letter of Understanding without job-specific charging available, and also for
22 increased labor costs due to a union sequester agreement.

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M. Security

SDG&E incurred increased security costs for alternative work sites in support of COVID-19 safe distancing and compliance with shelter-in-place requirements.

III. SUMMARY

This concludes my prepared direct testimony.

1 **IV. QUALIFICATIONS**

2 My name is Ron Kiralla. My business address is 8330 Century Park Court, San Diego,
3 California 92123. I am employed by SDG&E as the Director – Safety. I have worked as a full-
4 time employee within the Sempra family of Company’s since 1981. I have held various
5 management assignments within operations and safety at SDG&E and Southern California Gas
6 Company over the past 27 years.

7 I have previously testified before the California Public Utilities Commission.

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