



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

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VIA E-MAIL

**SUBJECT: QUARTERLY NOTIFICATION TO THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY REGARDING SDG&E'S IMPLEMENTATION OF ITS WILDFIRE MITIGATION PLAN, PURSUANT TO PUBLIC UTILITIES CODE SECTION 8389(e)(7)**

Per Public Utilities Code Section 8389(e)(7) and the February 16, 2021 Wildfire Safety Division (WSD) Compliance Operational Protocols,<sup>1</sup> San Diego Gas & Electric Company (SDG&E or the Company) hereby submits to the Office of Energy Infrastructure Safety (OEIS) this notification detailing the implementation of its approved Wildfire Mitigation Plan and the recommendations of the most recent safety culture assessment; a statement of recommendations of the Board of Directors Safety Committee (Safety Committee) meetings that occurred during the quarter;<sup>2</sup> and a summary of the implementation of the Safety Committee recommendations from SDG&E's previous notification letter.<sup>3</sup>

**PURPOSE**

The purpose of this notification is to comply with the requirements of Section 8389(e)(7), which were added to the Public Utilities Code by Assembly Bill (AB) 1054 on July 12, 2019, and subsequently amended by AB 148 on July 22, 2021, to reflect the transition of the Wildfire Safety Division at the California Public Utilities Commission to the Office of Energy Infrastructure Safety (OEIS). Section 8389(e)(7) requires electrical corporations to file a notice of implementation of its wildfire mitigation plan with OEIS "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 is simultaneously submitting this notice to the California Public Utilities Commission as an information only submittal.<sup>4</sup>

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<sup>1</sup> The WSD's Compliance Operational Protocols provides guidance on the contents, format, and timing of the compliance reporting the WSD requires of the electrical corporations.

<sup>2</sup> This notification includes information relating to activities and events that occurred in the third quarter of 2021.

<sup>3</sup> SDG&E Notification Letter Filed on August 2, 2021.

<sup>4</sup> Public Utilities Code Section 8389(e)(7).

**BACKGROUND**

Governor Newsom signed AB 1054 into law on July 12, 2019. AB 1054 contains numerous statutory provisions and amendments designed to enhance the mitigation and prevention of catastrophic wildfires – including wildfires linked to utility equipment – in California. AB 1054 added Section 8389 to the Public Utilities Code. Section 8389(e) establishes the requirements for annual safety certifications<sup>5</sup> and, *inter alia*, requires electrical corporations to establish a safety committee of its board of directors composed of members with relevant safety experience, establish board-of-director-level reporting to the Commission on safety issues, and file quarterly submissions notifying OEIS and the Commission of the implementation of its Wildfire Mitigation Plan and other matters as described above.

**DISCUSSION****Implementation of SDG&E's Approved Wildfire Mitigation Plan**

SDG&E continues to track 35 quantitative metrics and 44 qualitative metrics on 78 different mitigations proposed in its 2021 Wildfire Mitigation Plan Update. These mitigations involve a wide array of topic areas such as: inspection and maintenance programs, infrastructure replacement programs, and vegetation management programs designed to mitigate the risk of ignitions due to a fault on the electric system. SDG&E has mitigation programs to enhance situational awareness, which informs SDG&E's risk models and helps prioritize infrastructure replacement; and strategies and tools for real time decision making during emergency response or Public Safety Power Shutoff (PSPS) events. SDG&E also has mitigations intended to reduce the impact of a wildfire once an ignition has occurred, including high-definition cameras, ground and aerial fire suppression resources, and a fuels management program.

In addition, 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 during PSPS events, and SDG&E's customer outreach programs.

In Attachment A hereto, SDG&E provides a breakdown of the progress on quantitative targets for these mitigations. In summary, SDG&E has fire hardened 107.9 miles of its electric system, completed 100% of its HFTD Tier 3 Inspections, and completed 86% of vegetation inspections through September 30, 2021. More information on these metrics can be found in SDG&E's Quarterly Initiative Update, also filed November 1, 2021.

**Implementation of SDG&E's Most Recent Safety Culture Assessment**

Energy Safety issued SDG&E's 2021 Safety Culture Assessment on September 2, 2021. The safety culture assessment was conducted by a third-party contractor, DEKRA, on behalf of Energy Safety. DEKRA assessed the safety culture of SDG&E through workplace surveys and interviews, and generally found that SDG&E "has a robust process for measuring and improving the safety culture, with ambitious near and long term safety objectives supported by field-based projects

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<sup>5</sup> SDG&E received its 2020 safety certification from the WSD via a letter dated September 14, 2020.

and initiatives for frontline supervisors, employees, and contractors.”<sup>6</sup> DEKRA made three recommendations for SDG&E to act upon:

1. Integrate safe behaviors associated with mitigating hazards from wildfires and hostile interactions with discontented members of the public into the Behavior-Based Safety observation program.
2. Clarify, coach, and track the behaviors field leadership needs to adopt to advance the safety culture.
3. Recognize and take action to mitigate the serious exposure posed by interactions with certain discontented members of the public.

SDG&E agreed to implement all of the findings and recommendations for improvement of its safety culture assessment on September 3, 2021. SDG&E is actively working to implement the safety culture assessment report through various methods under consideration, including but not limited to the following:

- Operational managers and supervisors will communicate and educate 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 and utilize in-house and contract workers to perform observations.
- Safety advisors will host meetings with groups who are likely to have interaction with members of the public and provide public safety training refreshers.
- If feasible, adding or expanding SDG&E’s near miss reporting application to capture risks posed by discontented members of the public.
- Host company-wide psychological safety town hall events and manager training workshops to educate and promote a culture of safety and trust.
- Chief Safety Officer will perform on-site safety visits (rotating district locations) with direct employee engagement, and monitor interactions and feedback.
- District leadership (Directors) will perform on-site safety visits (rotating district locations) with direct employee engagement; track interactions and feedback.
- District leaders will hold safety all-hands meetings to clarify and set safety expectations to advance the safety culture.
- Executive Safety Council (ESC) will solicit feedback from front-line operational employees and supervision on safety culture.

In addition, in October 2021, SDG&E sent an internal communication, as part of its ongoing commitment to employee safety, providing resources aimed at protecting the safety and security of all employees. These include telephone contacts for reporting incidents and/or seeking help as well as a non-emergency security incident online tool, mental health resources and reminders.

### **Meetings of SDG&E’s Board Safety Committee Meeting**

The SDG&E Board Safety Committee<sup>7</sup> advises and assists the Board of Directors in the oversight of safely providing electric and natural gas services to the Company’s customers. The Safety

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<sup>6</sup> *Safety Culture Assessment for San Diego Gas & Electric Company*, prepared by DEKRA (September 2021).

<sup>7</sup> The Safety Committee members include Erbin B. Keith, Chairman; Robert J. Borthwick; and Caroline A. Winn.

Committee held a meeting on July 20, 2021, during which it received presentations from SDG&E management and employees. During the meeting, the Safety Committee asked questions and engaged with SDG&E management and employees regarding the subjects of their presentations. SDG&E's next Board Safety Committee meeting is scheduled for November 2, 2021.

### **Implementation of Recommendations of the Board of Directors Safety Committee in the Prior Quarter**

SDG&E's next Board Safety Committee meeting is scheduled for November 2, 2021. SDG&E will provide an update on the meeting and any recommendations of the Board Safety Committee in its next quarterly submission.

### **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 met on August 18, 2021. The Wildfire Safety Community Advisory Council 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.

SDG&E's Chief Executive Officer, Caroline Winn, opened the August 18 meeting and provided updates regarding SDG&E's ongoing efforts to mitigate wildfire risk, including SDG&E's participation in the regional county wildfire preparedness press conference, attended by San Diego County officials, law enforcement, and emergency agencies. Ms. Winn shared SDG&E's annual wildfire and safety resiliency news release and video presentation, which highlighted SDG&E's safety advancements during the previous year—including the ongoing development of SDG&E's private LTE communications network, virtual reality training, and weather and situational awareness enhancements. Ms. Winn highlighted SDG&E's expanding community partnerships to support vulnerable communities, including a \$150,000 shareholder contribution to the San Diego Mobile Food Bank Pantry and support for the Southern Indian Health Council Roaming Outpatient Access Mobile, a mobile clinic that can be leveraged to support customers during PSPS events. Ms. Winn also cited recent coverage in "Giving Back" Magazine describing SDG&E's partnership with 211 San Diego to assist Access and Functional Needs Customers during PSPS events. She described SDG&E's partnership with 211 as putting people and safety first—a core value of SDG&E.

Chief Tony Meacham, San Diego Unit Chief for CAL FIRE, presented to the Council on 2021 Statewide fire conditions and described initiatives to address wildfire risk in San Diego County. Chief Meacham described CAL FIRE San Diego's approaches to reduce community risk, including fuel reduction efforts, focusing on defensible space, community education, and a focus on evacuation corridors. Chief Meacham noted that there are opportunities for partnerships between CAL FIRE, SDG&E and other community stakeholders to educate the community about the wildfire environment and help customers understand both the risks of wildfire and mitigation efforts. He noted that wildfire mitigation requires a holistic approach because it impacts the state, private property, utilities, and business.

Alex Kim, SDG&E Director of Customer Programs, and Andrea Smith, SDG&E Director of Marketing and Communications, presented on SDG&E's new efforts to communicate with and provide tools

for customers with Access and Functional Needs (AFN). Mr. Kim described SDG&E's efforts to identify additional AFN customers, understand the nature of the AFN population, and identify additional resources to address their needs. He also described SDG&E's efforts to increase Medical Baseline enrollment and noted that all Medical Baseline customers who have experienced a PSPS event will be offered a generator in 2021. SDG&E has also improved its accessibility for wildfire and PSPS events, including the use of DeafLink technology for alerts, increased system capacity for faster notifications, and a multi-channel approach to alerts. Ms. Winn noted that SDG&E is always looking for new ways to improve and solicited ongoing ideas and feedback from the Council regarding accessibility and AFN support.

John Jenkins, SDG&E Vice President for Electric Systems Operations presented on SDG&E's 2021 fire hardening and wildfire mitigation efforts. He described the evolution of SDG&E's fire hardening efforts from 2008 to the present, and how SDG&E continues to improve its fire modeling, fire science, weather network, and situational awareness to enhance wildfire mitigation efforts. Mr. Jenkins noted the ongoing drought in California and how SDG&E has increased its efforts to mitigate both wildfires and PSPS events through microgrids, expanded drone inspections, infrastructure hardening, and advanced protection systems. He also provided an update on SDG&E's Wildfire Mitigation Plan initiatives for 2021, including increased covered conductor installation and strategic undergrounding.

The next Wildfire Safety Community Advisory Council meeting is scheduled to take place on November 19, 2021.

### **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/2021-wildfire-mitigation-plan>).

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company