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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 #2024-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,<sup>1</sup> 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,<sup>2</sup> 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

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<sup>1</sup> 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.

<sup>2</sup> 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 first quarter of 2024 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](mailto:rachel.peterson@cpuc.ca.gov), and the CPUC Safety Policy Division at [safetypolicycentralfiles@cpuc.ca.gov](mailto:safetypolicycentralfiles@cpuc.ca.gov).<sup>3</sup> In addition, pursuant to the guidance received from the Commission’s Safety Policy Division, SDG&E is also simultaneously serving this quarterly notification as an information-only submittal via email to the service lists of Order Instituting Rulemaking (R.) 21-10-001 (Order Instituting Rulemaking to Develop Safety Culture Assessments for Electric and Natural Gas Utilities), R.18-10-007 (Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901), and Application 22-05-016 (SDG&E’s most recent General Rate Case application proceeding).

### **2) Quarterly Progress Report on WMP Implementation**

SDG&E tracks 42 quantitative targets established 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, achieve risk reduction by reducing the likelihood of an ignition., SDG&E utilizes and continues to enhance its risk modeling to inform decision making for mitigation prioritization and during emergency response or PSPS events.

SDG&E also employs 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 sectionalizing switches to limit the number of customers exposed to PSPS, the establishment of customer

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<sup>3</sup> Public Utilities Code Section 8389(e)(7).

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 fourth quarter of 2024 is included in Attachment A. In summary, SDG&E has fire hardened over 117 miles of its electric system, including 81 miles of undergrounding and 36 miles of covered conductor. SDG&E has completed more than 100% of its required transmission and distribution inspections in the HFTD. In addition, SDG&E completed more than 100% of its detailed vegetation inspections, pole clearing, and clearance activities. Many of the programs that SDG&E is currently reporting as off track are subject to revised targets assuming approval of SDG&E's Change Order Request submitted to Energy Safety on January 27, 2025. SDG&E will also provide additional detail regarding any off-track initiatives in its Annual Report on Compliance submitted later this year. More information on these initiative progress and outcome metrics is provided in SDG&E's Quarterly Data Report, also filed February 1, 2025.

### **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) and its 2023 Safety Culture Assessment Report on March 22, 2024 (2023 SCA Report). Each report details the assessment carried out by the National Safety Council (NSC), who worked to assess the safety culture of SDG&E through management self-assessment as well as workplace surveys and interviews. In both the 2022 and 2023 SCA Reports, the NSC generally concludes that SDG&E has exhibited continued commitment to advancing its safety culture maturity.”<sup>4</sup>

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

- 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.
- 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.
- 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.

The 2023 SCA Report included three recommendations for SDG&E that were largely similar to the 2022 recommendations and included a fourth recommendation as follows:

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<sup>4</sup> 2022 SCA Report at p. 3; 2023 SCA Report at p. 3.

- SDG&E should increase engagement on the safety culture assessment within the workforce supporting wildfire mitigation initiatives.

On June 15, 2023, SDG&E agreed to implement all of the findings and recommendations from its 2022 SCA Report.<sup>5</sup> On April 5, 2024, SDG&E agreed to implement all of the findings and recommendations from its 2023 SCA Report.<sup>6</sup> As stated in SDG&E's Request for a 2023 Safety Certification<sup>7</sup>, SDG&E "is continually working to promote innovation and enhancement in its safety culture."<sup>8</sup> To highlight its efforts to implement the recommendations of its most recent safety culture assessment, SDG&E continues perform activities to implement the 2021, 2022 and 2023 safety culture assessment reports through various methods, including but not limited to the following:

- 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 during Q4 2024 to implement its 2022 and 2023 Safety Culture Assessment Report recommendations. SDG&E is

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

<sup>6</sup> *Agreement of San Diego Gas & Electric to Implement the Findings of the 2023 Safety Culture Assessment, April 5, 2024* (Energy Safety Docket # 2023-SCAs).

<sup>7</sup> *San Diego Gas & Electric Company's Request for a 2023 Safety Certification Pursuant to Public Utilities Code Section 8389*, submitted September 8, 2023.

<sup>8</sup> *Id.* at 10.

reporting on implementation of both its 2022 and 2023 Safety Culture Assessment Report Recommendations:<sup>9</sup>

### Implementation of Recommendation 1

- SDG&E Executive Leadership continued issuance of weekly employee-wide communications highlighting weekly safety performance, recognizing instances of stopped work and submissions of near miss reports, lessons learned, key safety reminders, and reinforcing leadership's commitment to safety.
- During Q4, 2024, SDG&E continued to engage and educate our leaders on the topic of inclusive leadership by offering a training tailored to help us operate in the current climate, titled "Activating Inclusive Leadership: Practically Applying Equity Principles and Practices in Polarized Times." This training workshop explores the current diversity, equity and inclusion landscape, how it remains a benefit to the company and all employees and offer strategies on how we can continue to facilitate a supportive workplace environment.
- On October 7, 2024, SDG&E launched its annual Fire Prevention Week campaign and communicated key safety tips, reminders and resources to all company employees.
- On October 11, 2024, SDG&E held its fifth annual Behavior Based Safety (BBS) appreciation event, recognizing and celebrating over 100 front-line employees who contribute to advancing our BBS peer-to-peer observation processes.
- On November 18, 2024, SDG&E issued an employee-wide communication stressing the importance of prioritizing mental health during the holiday season. Safety tips, reminders, available tools and resources available to employees were highlighted. This communication was followed-up with an article on the company portal on December 6, 2024, for increased awareness.
- On November 21, 2024, SDG&E hosted Caroline Thomas Jacobs, Director, Tony Marino, Acting Deputy Director, and Kimberly Carr, Senior Policy Advisor to share SDG&E's efforts to enhance employee, contractor and public safety. The OEIS site visit included a trip to a Strategic Undergrounding construction site and panel discussions on employee and contractor safety culture initiatives.
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### Implementation of Recommendation 2

- During Q4 2024, SDG&E continued to monitor customer and employee feedback on work completed by the Customer Field Organization as part of its Advanced Customer Notification pilot (launched in Q2 2024 to enhance employee safety measures when performing work on or around customer property).
- In Q4 2024, SDG&E advanced its Advance Customer Notification deployment efforts to expand notifications for Gas Patrols. These notifications inform customers of our gas patrol work in their areas and includes a link to a website that describes this type of work

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<sup>9</sup> Given the general overlap of the recommendations for 2022 and 2023, and consistent with the requirements of Public Utilities Code Section 8389(e)(7) that electrical corporations provide an update on the "most recent" safety culture assessment recommendations in the QNL, future submissions will focus on implementation of the 2023 SCA Report recommendations.

as well as a video showing customers what to expect. These courtesy text and email messages were successfully deployed on October 1, 2024.

- 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 and weekly Near Miss Summary Reports sent to all employees, where applicable.
- 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 in Q4 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

- In Q4 2024, SDG&E continued to deploy 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, highlights follow-up action items, resulting safety improvements, safety reminders, key teachings, and recognizes instances of stopped work.
- In 2024, SDG&E achieved the highest number of Near Miss reports submitted on record. SDG&E employees submitted 447 Near Miss Reports and our Contractors submitted another 257 Near Misses and Good Catches, together, equaling 704 opportunities to listen, learn and improve.
- SDG&E key Near Miss reporting trends for 2024 include:
  - 29% of employee submitted Near Miss reports were procedure-related. The majority of these are related to customers circumventing SDG&E procedures when performing residential construction activities (e.g., building an Accessory Dwelling

Unit (ADU), Unauthorized Panel Entry (UPE), safety clearance issues, etc.). SDG&E's Business Optimization team is leading an effort to identify and implement long-term solutions to mitigate this risk.

- 18% of employee submitted Near Miss reports were vehicle- or driving-related. Many include unsafe driving behaviors on company property as well as third-party drivers posing safety risk to our colleagues performing work. Safe driving and work zone safety initiatives will be part of our 2025 Safety Management Action Plan.
  - 30% of contractor submitted Near Miss reports were related to mis-marked or unmarked utilities. Many of these instances demonstrate our contractors performing their due diligence and following correct digging procedures. It also allows us to reinforce key safety reminders on safe digging practices.
  - 57% of employee submitted Near Miss reports were anonymous. We want to continue to build trust and promote a psychologically safe environment where employees feel comfortable including their names. Non-anonymous reporting allows for greater follow-up by the safety team.
- 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. Improvements have been made regarding notifications of potential fire ignitions. Fire Coordination is now getting notification from Service Dispatch on all SDG&E resource requests related to a response of emergency services for a possible fire. In 2024, SDG&E's Ignition Management Program underwent an internal Sempra audit. Upon receipt of the final report from the Auditor, SDG&E will work on the suggested opportunities for improvement that were identified during 2025.

#### Implementation of Recommendation 4 (2023 SCA Report only)

- In Q4 2024, SDG&E continued to assess stakeholder feedback and input provided during its Q2 2024 Wildfire Mitigation Advancement Team Challenge Session. The objective of this event was to spend time as a collective group focusing on wildfire safety and thinking about how we can continue to double-down on our wildfire mitigation efforts. This challenge session focused on wildfire safety, recent fires from across the country and the globe, and accomplishments attributed to SDG&E's doubling-down initiatives. Teams participated in a facilitated innovation session to leverage cross-functional experience and expertise to allow us to continually improve in our wildfire mitigation and safety initiatives.
- As SDG&E prepared for its 2024 Safety Culture Assessment (launched January 6, 2025), SDG&E worked to solicit increased engagement within the workforce supporting wildfire mitigation initiatives.

- On 12/30/24, SDG&E issued a communication to all identified 2024 Safety Culture Assessment survey participants highlighting the importance of their feedback, assuring anonymity of responses, and encouraging participation.

#### 4) Board of Directors Safety Committee Meetings and Recommendations

The SDG&E Board Safety Committee<sup>10</sup> 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 last met on October 17, 2024; the presentations made during that meeting were summarized in SDG&E's November 1, 2024, Quarterly Notification Letter. The Safety Committee's next meeting is currently scheduled for late February; SDG&E will provide additional updates regarding the Safety Committee meeting and recommendations in the next Quarterly Notification Letter.

##### 4.1) Recommendations from the Most Recent Quarter

During the October 17, 2024, Board Safety Committee meeting, Rob Borthwick, Board Safety Committee Chair, recommended that, at an upcoming Safety Committee meeting, SDG&E report on the following:

- Provide a presentation on SDG&E's contractor safety performance, and contractor safety performance accountability.

##### 4.2) Progress on Previous Recommendations

Pending and recently completed Safety Committee Recommendations are summarized in the following table.

Meeting Date	Recommendation	Status
July 18, 2023	Report on inspections of legacy gas transmission lines, and the Company's programs to address public safety during gas incidents	Completed February 28, 2024
November 7, 2023	Report on the 2020 PacifiCorp fires	Completed April 23, 2024
February 28, 2024	Report on the Company's efforts to prepare for extreme weather events, including flooding and tropical storms, as well as lessons learned from prior events;	Completed October 17, 2024
February 28, 2024	Conduct a site visit to a wildfire hardening location	Completed April 16, 2024

<sup>10</sup> SDG&E's Board Safety Committee members include Robert J. Borthwick, Chair of the Board Safety Committee and Chief Risk Officer at Sempra; Trevor Mihalik, Executive Vice President and Group President at Sempra; and Caroline A. Winn, SDG&E Chief Executive Officer.



April 23, 2024	Report on potential safety hazards associated with battery energy storage systems, and SDG&E's efforts to mitigate battery safety risks	Completed July 25, 2024
July 25, 2024	Report on potential safety hazards associated with pole failures, SDG&E's efforts to mitigate pole failure risks, and pole replacement safety	Completed October 17, 2024
October 17, 2024	Report on contractor safety performance and contractor safety performance accountability	Pending

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

### 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 1, 2024. 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 1, 2024, meeting was led by SDG&E COO and Chief Safety Officer Kevin Geraghty, and touched on several topics, including an update on PSPS preparedness and the PSPS outlook for the ongoing peak wildfire season, a discussion of the fire at the Escondido Battery Energy Storage System, and an update on SDG&E's wildfire mitigation grid hardening initiatives and pending General Rate Case. The next WSCAC meeting is scheduled for February 7, 2025.

### 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/2025-wildfire-mitigation-plan>).

Respectfully submitted,

*/s/ Laura M. Fulton*

Attorney for  
San Diego Gas and Electric Company