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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).<sup>3</sup>

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

SDG&E tracks 42 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 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 first quarter of 2024 is included in Attachment A. In summary, SDG&E has fire hardened 12.74 miles of its electric system, including 3.2 miles of undergrounding and 6.5 miles of covered conductor. SDG&E has completed 48% of its required detailed distribution inspections, 30% of its detailed transmission

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

inspections, and 26% of its detailed vegetation inspections for 2024. More information on these metrics can be found in SDG&E's Quarterly Data Report, also filed May 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) 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:

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.

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:

4. 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

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

<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).

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 specifically to implement its 2022 and 2023 Safety Culture Assessment Report recommendations. Because of the recent issuance of SDG&E’s 2023 SCA Report, SDG&E is reporting on implementation of both the 2022 and 2023 Safety Culture Assessment Report Recommendations:<sup>9</sup>

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<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.

<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.

### 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.
- During Q1 2024, SDG&E experienced two significant storm events across its service territory where the Deputy Emergency Operations Center – Electric (DOC-E) was activated at a Level 3 for resource planning and coordination. During these events, safety remained the top priority and leadership messaging to prioritize safety over restoration efforts was consistently communicated. Additionally, in advance of and during these storm events, SDG&E sent out employee-wide safety messaging urging employees to prioritize safety.
- On March 6, 2024, SDG&E held its Q1 Executive Safety Council employee dialogue and listening sessions at its Beach Cities Construction and Operations District. During this meeting, cross-functional front-line employees and supervision were invited to share their candid input, feedback, safety concerns and/or suggestions during separate dialog sessions with SDG&E's executive leadership team.

### 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 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.

- In Q1 2024, SDG&E deployed an Electric & Gas Outage Notification Optimization program where operational teams are partnering with the Customer Experience team to optimize outage notification experience based on customer feedback and insights. Current focus areas include: unplanned electric outages, estimated restoration times and gas outages. The objective is to increase the accuracy, frequency, and transparency of outage notifications to help reduce the risk of hostile customer interactions.

### 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.

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

- On April 24, 2024, SDG&E hosted a Wildfire Mitigation Advancement Team Challenge Session. The objective of this half-day meeting is 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 meeting focused on wildfire safety, recent fires from across the country and the globe, and recent accomplishments attributed to 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.

5. As SDG&E prepares for its 2024 Safety Culture Assessment, SDG&E will work to solicit increased engagement within the workforce supporting wildfire mitigation initiatives.

#### **4) Board of Directors Safety Committee 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 met on February 28, 2024 and April 23, 2024, and heard presentations on the following topics:

##### February 28, 2024 Meeting

- Brian D'Agostino, SDG&E Vice President for Wildfire and Climate Science, and Jonathan Woldemariam, SDG&E Director for Wildfire Mitigation, led the Committee on a tour of SDG&E's new Wildfire and Climate Resilience Center.
- Kevin Geraghty, SDG&E Chief Operating Officer and Chief Safety Officer provided an overview of the Company's safety performance metrics. He also briefed the Committee on recent public and contractor injuries and discussed lessons learned and follow up actions taken by SDG&E.
- Mr. D'Agostino provided the Committee with a wildfire safety update, noting that SDG&E remains an industry leader in wildfire mitigation and resilience. He focused on the Company's ongoing efforts to proactively foster a wildfire safety culture based on technology, innovation and continuous improvement in light of increasing extreme climate events in the United States and despite recent below-average wildfire seasons. Mr. Woldemariam summarized SDG&E's 2023 Wildfire Mitigation Plan results and reported on planned 2024 Wildfire Mitigation Plan initiatives.
- Rodger Schwecke, SDG&E Senior Vice President for Gas Operations and Construction, and Tashonda Taylor, SDG&E Vice President for Gas Operations, provided an overview and history of the Company's various gas integrity management and safety programs. Ms. Taylor reviewed the requirements of various state and federal gas safety regulations, including the Transmission Integrity Management Program; the Distribution Integrity Management Program; the Pipeline Safety Enhancement Plan; the Gas Safety Enhancement Programs; and the Mobile Home Park Utility Conversion Program. She noted that developments in safety compliance require the Company to meet stricter standards and use sophisticated monitoring and inspection technology, but that such enhancements align with the Company's commitment to continuous risk reduction and good stewardship of its pipeline system.

##### April 23, 2024 Meeting

- Mr. Borthwick, Board Safety Committee Chair, noted his enjoyment of two recent safety site visits performed by the Board. He noted that during the visits to wildfire hardening

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<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.

sites and a gas line replacement for Line 1600, the Committee was able to observe many safety aspects of the work and new equipment installations.

- Mr. Geraghty provided an update on the Company's safety performance and safety metrics.
- Mr. Schwecke and Brian Walker, SoCalGas Director of Project Management, provided an update on the Moreno Compressor Station Modernization. Mr. Walker noted the importance of the Moreno Compressor Station to the San Diego region, and discussed how the modernization project addresses safety risk mitigation throughout the project lifecycle, including front end engineering, construction, and operations.
- Mr. D'Agostino presented on the results of the 2023 SDG&E Wildfire Safety Culture Assessment results and recommendations, issued by the Office of Energy Infrastructure Safety.
- Alex Kim, SDG&E Director of Customer Care, Robert Watson, SDG&E Director of Safety, Kristin Hamon, SDG&E Safety Compliance Manager, and Caitlin King, SDG&E Industrial Athletic Trainer, discussed SDG&E's Office Safety Program Overview. The presenters noted the importance of safety for office workers as well as field workers, and the primary safety concerns in the office, including but not limited to repetitive motion injuries, strains and sprains, and falls. The presenters discussed SDG&E's proactive approach to mitigating office safety risks, including annual ergonomic training, peer to peer observations, and office safety advisors.
- Doug Dixon of the law firm Hueston Hennigan provided an overview of the 2020 Oregon fires in the PacifiCorp service territory, the litigation related to those fires, and an update on other utility-related wildfire claims and litigation throughout the country.
- Joy Gao, Vice President for Audit Services at Sempra, provided an update on the safety audits performed for SDG&E in 2023 and planned audits in 2024.
- The Committee reviewed its charter.

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

During the February 28, 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:

- The Company's efforts to prepare for extreme weather events, including flooding and tropical storms, as well as lessons learned from prior events;
- The Committee to conduct a site visit to a wildfire hardening site.

During the April 23, 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:

- Potential safety hazards associated with battery energy storage systems, and SDG&E's efforts to mitigate battery safety risks.



#### 4.2) Progress on Previous Recommendations

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

<b>Meeting Date</b>	<b>Recommendation</b>	<b>Status</b>
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;	Pending
February 28, 2024	Conduct a site visit to a wildfire hardening location	Completed April 16, 2024
April 23, 2024	Report on potential safety hazards associated with battery energy storage systems, and SDG&E's efforts to mitigate battery safety risks	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 February 2, 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 February 2, 2024 meeting was led by SDG&E COO and Chief Safety Officer Kevin Geraghty, and touched on several topics, including the following:

- Mr. Geraghty noted that SDG&E was recently recognized with the 2023 Bertha Lamme Top Innovator Award for development of its Wildfire Next Generation System (WiNGS) model, which informs SDG&E's wildfire hardening strategy and PSPS decision making. He also noted that SDG&E was again recognized by Reliability One for its outstanding reliability and grid sustainability efforts in 2023.
- Kazeem Omidiji, SDG&E Director for Community Relations, discussed the recent severe flooding that followed several storm events in San Diego in February. He noted the unprecedented damage from rainfall and how SDG&E was deploying charitable efforts and contributions to communities and organizations to aid in flood response.

- Bill York, of 211 San Diego, also discussed flood response and how the events highlighted the continued need for collaboration and coordination among community partners to target resources effectively. Mr. Geraghty noted how the flooding highlighted the ongoing risks of climate change and the need to focus efforts on both wildfire and climate resiliency.
- Mr. D'Agostino provided the WSCAC with a tour of the new Wildfire and Climate Resilience Center.

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/2025-wildfire-mitigation-plan>).

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for  
San Diego Gas and Electric Company