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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 2023 Q1 Quarterly Notification Letter**

**Docket #2023-SC**

Dear Director Thomas Jacobs:

Pursuant to 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 (Energy Safety) this notification detailing the implementation of (1) SDG&E's approved Wildfire Mitigation Plan, (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.<sup>2</sup>

## **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, including the creation of the safety certification process. Among other things, AB 1054 added Section 8389 to the Public Utilities Code. Section 8389(e) established the requirements the electrical corporations to receive an annual safety certification,<sup>3</sup> including the establishment of a safety committee of the electrical corporation's board of directors composed of members with relevant safety experience, board-of-director-level reporting to the Commission on safety issues, and the submission of quarterly reports

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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> SDG&E Notification Letter Filed on November 1, 2022.

<sup>3</sup> SDG&E received its safety certification from Energy Safety via a letter dated December 8, 2022.

notifying Energy Safety and the Commission of the implementation of its Wildfire Mitigation Plan and other matters.

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 2023 is contained herein. SDG&E is simultaneously submitting this notice to the California Public Utilities Commission as an information only submittal.<sup>4</sup>

## II. DISCUSSION

### **Implementation of SDG&E’s Approved Wildfire Mitigation Plan**

SDG&E tracks 39 quantitative metrics proposed in its 2023-2025 Wildfire Mitigation Plan. These mitigations are categorized across three categories within the WMP including Grid Design, Operations, and Maintenance, Vegetation Management and Inspection, and Situational Awareness and Forecasting. These initiatives are implemented to mitigate the risk of ignitions due to a fault on the electric system and reduce the impacts of PSPS to customers. SDG&E’s main system hardening initiatives of covered conductor installation and undergrounding of electric distribution infrastructure provide risk reduction by reducing the likelihood of an ignition. SDG&E has mitigation programs to enhance SDG&E’s risk models 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 once an ignition has occurred, including high-definition cameras, ground and aerial fire suppression resources, and a fuels management program. 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 10.5 miles of its electric system, including 4.4 miles of undergrounding and 3.8 miles of covered conductor. SDG&E has completed 39% of its detailed distribution inspections, 1% of its detailed transmission inspections, and 24% of its detailed vegetation inspections for 2023. More information on these metrics can be found in SDG&E’s Quarterly Data Report, also filed May 1, 2023.

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

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

Energy Safety issued SDG&E's 2021 Safety Culture Assessment on September 2, 2021.<sup>5</sup> 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 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 (BBS) 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.

On September 3, 2021, SDG&E agreed to implement all of the findings and recommendations from its 2021 safety culture assessment report. As stated in SDG&E's Request for a 2022 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 safety culture assessment report through various methods, including but not limited to the following:

- 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.

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<sup>5</sup> SDG&E has not yet received its final 2022 Safety Culture Assessment Report, of which SDG&E's Management Self-Assessment Report was submitted on August 2022.

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

<sup>7</sup> *San Diego Gas & Electric Company's Request for a 2022 Safety Certification Pursuant to Public Utilities Code Section 8389*, submitted September 9, 2022.

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

- District leadership (Directors) 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.
- Modifying BBS observation checklist descriptions to include instructions for observers to consider whether employees are identifying potential hazards on customer premises.
- Establishing an Electric Distribution Operations BBS process to help improve awareness of switching error hazards, increase psychological safety in raising and learning from errors, with an ultimate goal of improving safe and accurate switching for the safety of field personnel and the public.

SDG&E is awaiting issuance of its final 2022 Safety Culture Assessment Report, which remains pending with Energy Safety. SDG&E therefore reports the following activities performed since its February 1, 2023 Quarterly Notification Letter to support the above-listed initiatives for implementing the 2021 Safety Culture Assessment Report recommendations:

- On January 30, 2023, SDG&E held an off-site “Start Strong” safety event. This first-ever event was led by SDG&E’s Chief Safety Officer and IBEW Local 465 Business Manager in partnership with operational leaders. Approximately 1,300 employees – primarily from our field and Union-represented workforce – were in attendance to hear directly from operational leaders who highlighted their teams’ successes, challenges and areas for focus in 2023. The primary theme focused on mental health and suicide awareness. Colleagues from NV Energy in Nevada shared their story of being personally impacted by suicide in their personal and professional lives. They helped shared this message to increase mental health awareness and encourage our employees to look out for one another, speak up, seek support, and utilize company resources.
- SDG&E’s Electric Regional Operations organization held its first-ever Working Foremen, Line Assistant and Apprentice Summits to reinforce key safety messages, demonstrate leadership commitment and hear directly from front-line workers.
- From March 20 – 24, 2023, SDG&E held a weeklong defensive driving safety campaign – comprised of morning meetings offered at 7:15 am and 8:15 am daily, safe driving tips and reminders, safety videos and prepared materials for teams to share - in response to a recent increase in Motor Vehicle Incidents and our employees being struck by third party vehicles.
- SDG&E held Electric Safety Subcommittee and Gas Safety Subcommittee meetings where Near Misses, Safety Incidents, and the status of open action items were reviewed. These meetings also provide a roundtable for employees of all levels, including Union representatives, to raise safety concerns or suggestions. Additionally, bi-weekly Office Safety Committee Directors meetings were held to review safety leading and lagging indicators, identify targeted areas of focus, and share any best practices or lessons learned.
- SDG&E held Safety Incident Review Meetings with operational Directors, Managers, Supervisors, safety teams, SDG&E’s Director – Safety and Chief Safety Officer to review safety incidents and Near Misses that had the potential to have caused serious injury or

fatality (SIF-potential) to identify corrective actions, safety improvements, and lessons learned. Following these meetings, lessons learned are shared with teams for broader awareness and continuous safety improvement.

### **Meetings of SDG&E's Board Safety Committee**

The SDG&E Board Safety Committee<sup>9</sup> advises and assists the Board of Directors in the oversight of safely providing electric and natural gas services to the Company's customers. Since the last Quarterly Notification, the Safety Committee met on two prior occasions, February 23, 2023 and April 26, 2023, and discussed the following topics:

#### February 23, 2023 Meeting

- Brian DAgostino, SDG&E Vice President for Wildfire and Climate Science, opened the meeting to discuss the impacts of the winter storm occurring in the area. Mr. DAgostino noted that ten weather stations in the area had broken all-time wind records, and over the prior six weeks there had been three events that resulted in hurricane force winds. Mr. DAgostino also noted that SDG&E's situational awareness promoted advanced preparation for these events to aid in response and reliability.
- Kevin Geraghty, SDG&E Chief Operating Officer and Chief Safety Officer, provided a safety performance update. Mr. Geraghty responded to questions from Board members regarding safety features on SDG&E fleet vehicles and an updated format for presentation of safety metrics.
- Jonathan Woldemariam, SDG&E Wildfire Mitigation Plan Director and Ashley Llacuna, SDG&E Wildfire Mitigation Strategy Manager, provided an update on SDG&E's 2023 Wildfire Mitigation Plan.
- Oliva Reyes, SDG&E Director of Construction and Vegetation Management provided an update on SDG&E's vegetation management efforts and discussed opportunities for an upcoming site visit.
- Tashonda Taylor, SDG&E Vice President for Gas Operations, presented on SDG&E's Damage Prevention Program. She noted the historic results achieved over the last year in protecting underground gas, electric, and fiber optic infrastructure, adding that these improvements provide both safety and reliability benefits.
- Carlos Mauer, Senior Vice President for Energy Networks at Sempra Infrastructure, presented on a recent safety incident at Sempra Infrastructure resulting in a contractor fatality.
- Rob Borthwick, Chair of the SDG&E Board Safety Committee, recommended that SDG&E prepare a report on the recent Envista Root Cause Analysis of the 2017-2018 PG&E Wildfires and the applicability of any lessons learned to SDG&E.

#### April 26, 2023 Meeting

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<sup>9</sup> SDG&E's Board Safety Committee members include Robert J. Borthwick, Chairman; Karen Sedgwick; and Caroline A. Winn.

- Kevin Geraghty provided a Safety Update and discussed current safety metrics and indicators. Mr. Geraghty noted that near-miss reporting continues to be strong and the Company is working to address concerns regarding motor vehicle incidents
- Sneha Parmar, SDG&E Director of Transmission and Substation Operations, and Nick Moran, SDG&E Director of Electric Engineering, presented on SDG&E's ongoing efforts to advance community safety through continuous innovation. They discussed SDG&E's use of analytics and technology to build situational awareness and provide a real time picture of system conditions which can aid in design and decision-making.
- Jonathan Woldemariam and Shaun Gahagan, SDG&E Wildfire Mitigation Plan Program Manager, presented on the Draft 2022 Wildfire Safety Culture Assessment Report and recommendations.
- Erbin Keith, SDG&E General Counsel, and Laura Fulton, SDG&E Senior Counsel, presented on the annual review of the SDG&E Board Safety Committee Charter and recommended revisions.
- Rob Borthwick recommended that SDG&E present on the Company's contractor safety management processes.

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

At the November 8, 2022, meeting, SDG&E's Board Safety Committee previously recommended that SDG&E schedule a vegetation management site visit. Ms. Reyes' presentation advanced the implementation of that recommendation.

### **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 February 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 February 3 meeting commenced with an introduction from the Council Chair, SDG&E Chief Operating Officer and Chief Safety Officer Kevin Geraghty. Mr. Geraghty noted that the WSCAC was having its first meeting in SDG&E's Emergency Operations Center (EOC) to demonstrate SDG&E's situational awareness capabilities both with respect to wildfires but also other extreme and emergency conditions that continue to arise from the changing climate. Mr. Geraghty also noted that SDG&E always welcomes feedback and outreach from WSCAC members on any topic.

Brian DAgostino, SDG&E Vice President for Wildfire and Climate Science discussed the wet start to the 2023 year and the increase in rainfall. Mr. DAgostino noted that while most of California was out of drought at the time, the rainfall could lead to increased grass fire conditions if vegetation dried out through the summer and fall. Mr. DAgostino answered questions about the interplay of the rainfall and recent Santa Ana wind event that occurred, which led to increased vegetation damage.

Jamie York, SDG&E Director for General Rate Case and Revenue Requirements, and Jonathan Woldemariam discussed SDG&E's 2023 Wildfire Mitigation Plan as well as the Test

Year 2024 General Rate Case. Ms. York discussed the General Rate Case process and Mr. Woldemariam discussed the hardening and wildfire mitigation programs supported by SDG&E's requested revenue requirement.

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