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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 #2025-SCs

Dear Director Thomas Jacobs:

Pursuant to Public Utilities Code Section 8389(e)(7) and the April 2025 Office of Energy Infrastructure Safety's (Energy Safety) Safety Certification Guidelines,¹ 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,² 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

¹ 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.

² SDG&E received its current safety certification from Energy Safety via a letter dated December 11, 2024.

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 2025 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, and the CPUC Safety Policy Division at safetypolicycentralfiles@cpuc.ca.gov.³ 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 43 quantitative initiatives 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 selection and prioritization and during emergency response or PSPS events. SDG&E also employs mitigations intended to reduce the impact of 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

³ Public Utilities Code Section 8389(e)(7).

PSPS, the establishment of community 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 2025 is included in Attachment A. In 2025, SDG&E has fire hardened 127 miles of its electric system, including 36.6 miles of undergrounding and 52 miles of covered conductor. SDG&E also completed 100% of all Vegetation Management and Inspections. 37 of the 43 programs substantially met or exceeded target in 2025, leaving six programs that may be considered delayed by Energy Safety. Of those six, three of the programs exceed the three-year scope of work, by completing additional scope in 2023 and 2024. The three remaining programs did experience delays in 2025, as outlined below. More information on initiative progress and outcome metrics is provided in SDG&E's Quarterly Data Report, also filed February 2, 2026.

Program	2025 Target	2025 Complete	Reason for Delay
Advanced protection	8	7	Required permits were delayed and not issued until Jan 2026.
Distribution communications reliability improvements	5	4	Delay due to field change order for unknown facilities discovered below grid. Remaining base station in construction for early 2026 delivery.
Expulsion fuse replacement	700	503	Petition to Amend submitted for reduced target due to GRC decision, so work scoped for 2025 was rolled back. Restarted program when Petition to Amend was denied, but unable to reach full target due to pause in program.

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), its 2023 Safety Culture Assessment Report on March 22, 2024 (2023 SCA Report), and its 2024 Safety Culture Assessment Report on December 19, 2025 (2024 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 each of the 2022, 2023 and 2024 SCA Reports, the NSC generally concludes that SDG&E has exhibited continued commitment to advancing its safety culture maturity.”⁴

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.

⁴ 2022 SCA Report at p. 3; 2023 SCA Report at p. 3; 2024 SCA Report at p. 3.

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.

The 2024 SCA Report included five recommendations for SDG&E. In addition to the above-listed recommendations regarding 1) prioritizing safety over job task goals, and 2) mitigating the risk exposure posed by interactions with the public, the 2024 SCA recommendation include:

5. Understanding the Safety Culture Perception Gap: SDG&E should investigate reasons for why its MSA remains high while employee and contractor perceptions have declined and research the modest decreases in workforce survey results to identify hidden vulnerabilities before they grow.
6. Identify Next Steps in Achieving Workforce Engagement in Safety Event Reporting: SDG&E should determine if lower than average employee perceptions are leading to suboptimal workforce near miss reporting and make a quantitative estimate of the reporting gap.
7. Improve Contractor Engagement in the Workforce Survey: SDG&E should identify existing barriers to contractor engagement in the workforce survey and overcome those barriers.

On June 15, 2023, SDG&E agreed to implement all of the findings and recommendations from its 2022 SCA Report.⁵ On April 5, 2024, SDG&E agreed to implement all of the findings and recommendations from its 2023 SCA Report.⁶ On January 9, 2026, SDG&E agreed to implement all of the findings and recommendations from its 2024 SCA Report.⁷ As stated in SDG&E's Request for a 2023 Safety Certification⁸, SDG&E "is continually working to promote

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

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

⁷ *Agreement of San Diego Gas & Electric to Implement the Findings of the 2024 Safety Culture Assessment, January 9, 2026* (Energy Safety Docket # 2024-SCAs).

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

innovation and enhancement in its safety culture.”⁹ To highlight its efforts to implement the recommendations of its most recent safety culture assessment, SDG&E continues perform activities to implement the 2022, 2023 and 2024 safety culture assessment reports through various methods, including but not limited to the following:

- Leadership site visits, ride alongs 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 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 2025 to implement its 2022 and 2023 Safety Culture Assessment Report recommendations. SDG&E is reporting on implementation of both its 2022 and 2023 Safety Culture Assessment Report Recommendations, collectively, and will report on progress of its 2024 Safety Culture Assessment Report recommendations starting with its Q1 2026 Quarterly Notification Letter.

Implementation of Recommendation 1: Prioritizing Safety over Production (2022, 2023 & 2024 SCA Reports)

- During Q4 2025, SDG&E continued issuance of a weekly Near Miss Summary Report that highlighted instances of stopped work – both employee and contractor – and thanked teams for prioritizing safety.
- During Q4 2025, SDG&E operational leaders continued to meet weekly to discuss safety incidents, successes and challenges to create broad awareness, highlight potential hazards and share best practices.

⁹ *Id.* at 10.

- During Q4 2025, SDG&E's Chief Safety Officer and other executives 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 2025, SDG&E's shared the results of its 2025 Employee Engagement Pulse Survey results with its workforce and directed leaders to develop action plans to drive continuous improvement.
- During Q4 2025, SDG&E launched a new 2025 President's Pinnacle Award – a recognition program that honors individuals who exemplify excellence in safety, use of technology and collaboration.

Implementation of Recommendation 2: Mitigate Risk of Hostile Interactions with Public (2022, 2023 and 2024 SCA Reports)

- During Q4 2025, SDG&E assembled a cross-functional team tasked with identifying solutions to improve our current practices for company-branded attire to meet the needs of our workforce and make them more easily identifiable when working on customer property in response to front-line employee feedback highlighting the opportunity to strengthen employee safety while working in the community.
- During Q4 2025, SDG&E continued to deploy improvements to its energization process to help simplify the customer journey by making it easier to find information, understand next steps, and track progress. Through these changes, SDG&E's goal is to improve customer satisfaction and enable customers, both residential and commercial, to start using their electrical services with minimal delays. This effort will help improve public and employee safety by aiming to reduce the frequency of customers circumventing SDG&E procedures and altering equipment prior to SDG&E's onsite visit.
- During Q4 2025, SDG&E continued to advance its Advance Customer Notification efforts. These notifications inform customers of work scheduled to be performed in their area and include a link to a website that describes the type of work as well as a video showing customers what to expect. These courtesy text and email messages were successfully deployed as an initial pilot program on October 1, 2024 to enhance customer experience and employee safety in the field.
- 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 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: Workforce Safety Event Reporting (2022, 2023 and 2024 SCA Reports)

- In 2025, 701 Near Miss and Good Catch Reports were submitted – 445 from employees and 256 from contractors. For the first time ever, non-anonymous employee Near Miss submittals surpassed anonymous ones with 59% of 2025 reports including names and contact details. This marks a significant milestone, indicating that more submitters feel comfortable enough to put their names on their reports. By identifying themselves, our colleagues enabled deeper follow-up, stronger collaboration, and a safer workplace for everyone.
- In 2025, 89% of actionable employee-submitted Near Miss reports resulted in completed safety actions or improvement.
- During Q4 2025, 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.
- The Ignition Management Program continues to utilize the evidence of heat report to capture data for OEIS 29300 (Cal. Code Regs. tit. 14 § 29300) and CPUC ignition reports. For improved situational awareness, Fire Coordination receives notification from Service Dispatch on all SDG&E resource requests related to a response of emergency services for a possible fire and follows up on all reports to determine the status of the incident. Processes are continuously reviewed regarding the efficiency of reporting incidents that meet regulatory requirements and documentation of potential fire ignitions. The Evidence of Heat and Ignition data informs wildfire risk analysis. In 2024/2025, SDG&E performed a review of the Ignition Management Program. This included feedback from subject matter experts and areas of other expertise to ensure an independent and diverse pool of opinions were considered in furtherance of continued improvement. In 2025, SDG&E reviewed the outcomes of that review process and implemented recommendations to promote additional efficiencies and opportunities to improve reporting processes. As of July 2025 all of the recommendations for improvements have been implemented.

Implementation of Recommendation 4: Increased Employee Survey Engagement (2023 SCA Report only)

- SDG&E continually works to promote a speak-up culture, enhance psychological safety and increase engagement across its employee and contractor workforce.
- As SDG&E prepared for its 2024 Safety Culture Assessment, it worked to solicit increased engagement within the employee and contractor workforce supporting wildfire mitigation initiatives.

- SDG&E's 2024 Safety Culture Assessment launched on January 6, 2025. Employees and Contractors identified as survey participants were encouraged to provide their feedback and reminded of the anonymity of survey responses.
- Issuance of SDG&E's 2025 Safety Culture Assessment Report shows an improved employee survey engagement rate of 75%.

Implementation of Recommendation 5: Understand the Safety Culture Perception Gap (2024 SCA Report)

- SDG&E is assessing its recently-issued 2024 Safety Culture Assessment Report and identifying ways to understand the perceived safety culture assessment report between its Management Self-Assessment (MSA) and workforce survey responses. SDG&E will investigate reasons why its MSA remains high while employee and contractor perceptions have declined and research the modest decreases in workforce survey results to identify hidden vulnerabilities before they grow.

Implementation of Recommendation 6: Identify Next Steps in Achieving Workforce Engagement in Safety Event Reporting (2024 SCA Report)

- SDG&E is assessing its recently-issued 2024 Safety Culture Assessment Report and will identify next steps in achieving increased workforce engagement in safety event reporting. SDG&E will determine if lower than average employee perceptions are leading to suboptimal workforce near miss reporting and make a quantitative estimate of the reporting gap.

Implementation of Recommendation 7: Improve Contractor Engagement in the Workforce Survey (2024 SCA Report)

- SDG&E is assessing its recently-issued 2024 Safety Culture Assessment Report and will identify existing barriers to contractor engagement in the workforce survey and work to overcome those barriers.

4) Board of Directors Safety Committee Meetings and Recommendations

The SDG&E Board Safety Committee¹⁰ 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 October 15, 2025, as discussed in SDG&E's last Quarterly Notification Letter. There have been no additional meetings of the Board Safety Committee prior to this submission. SDG&E's Board Safety Committee next meets on February 26, 2026; SDG&E will provide an update on the meeting and any recommendations in the next Quarterly Notification Letter.

¹⁰ SDG&E's Board Safety Committee members include Robert J. Borthwick, Chair of the Board Safety Committee and Chief Risk Officer at Sempra; Glen Donovan, Senior Vice President for Finance at Sempra; and Caroline A. Winn, SDG&E Chief Executive Officer.

4.1) Recommendations from the Most Recent Quarter

As reported in the SDG&E's prior Quarterly Notification Letter, during the October 15, 2025 Board Safety Committee meeting, Rob Borthwick, Board Safety Committee Chair, recommended that, at an upcoming Safety Committee meeting, SDG&E report on the following:

- SDG&E provide an update on efforts to monitor and improve driving safety.
- SDG&E provide an update on telematics in company vehicles.

4.2) Progress on Previous Recommendations

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

Meeting Date	Recommendation	Status
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
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	Completed October 15, 2025
February 26, 2025	Review SDG&E's late 2024 and January 2025 PSPS events and mutual aid efforts in response to the LA Fires, and report on any lessons learned	Completed May 22, 2025
February 26, 2025	Provide an update on SDG&E's customer communications and notifications regarding field visits and routine work notifications	Completed July 31, 2025
May 22, 2025	Provide an update on the upcoming CPUC Safety Culture Assessment Rulemaking and SDG&E's upcoming Safety Culture Assessment	Completed October 15, 2025
July 31, 2025	Present on prevention of injuries related to falling from heights, and lessons learned from any previous fall-related events	Pending
July 31, 2025	Present on risks associated with out-of-service transmission lines in the High Fire Threat District (HFTD)	Completed on October 15, 2025
October 15, 2025	Provide an update on efforts to monitor and improve driving safety	Pending

Meeting Date	Recommendation	Status
October 15, 2025	Provide an update on telematics in company vehicles	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 (WSCAC) last met on December 5, 2025. The 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.

At the December 5, 2025 WSCAC meeting, SDG&E representatives discussed member updates, including San Diego County's purchase of a Sikorsky-70 Firehawk helicopter through a partnership with CAL FIRE and SDG&E. The WSCAC received presentations on the 2025 Santa Ana and PSPS season, the California Public Utilities Commission's Proposed Decision addressing SDG&E's 2019-2022 Wildfire Mitigation Plan implementation costs, and the whitepapers submitted by SDG&E and other California Investor-Owned Utilities in response to the California Earthquake Authority's request for submissions pursuant to Senate Bill 254.

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/2026-2028-wildfire-mitigation-plan>).

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company

cc: Service Lists:

R.21-10-001

R.18-10-007

A.22-05-015/016

Safety Policy Central Files