2026 Gas Safety Plan

March 13, 2026

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Mr. James Zhang, Utilities Engineer
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue, 2nd Floor
San Francisco, CA 94102

RE: **San Diego Gas & Electric Company 2026 Gas Safety Plan**

Dear Mr. Zhang:

San Diego Gas & Electric Company (SDG&E) is pleased to submit its annual Gas Safety Plan. This document outlines our comprehensive strategy and approach to safety, reaffirming SDG&E's commitment to the protection of our system, customers, employees, contractors, and the communities we serve.

Safety is a fundamental core value and underpins all our actions. This commitment to safety is ingrained in our culture and exemplified by our dedicated workers – from senior leadership to front-line workers who safely manage and operate the gas system and serve our customers daily.

SDG&E's safety culture encourages an environment where employees and contractors at all levels, across all work locations and departments, are empowered to offer safety suggestions, report near misses, identify hazards, raise safety concerns, and "stop the job" if they ever feel unsure about a situation. In essence, our workforce takes pride in their work and responsibility for safety.

Although a strong culture of safety exists today, SDG&E remains committed to evolving as a learning organization. As part of this commitment, SDG&E adopts a safety management system (SMS) designed to manage safety risks by adapting, expanding, and integrating the SMS framework outlined in American Petroleum Institute Recommended Practice 1173 (API RP 1173). SDG&E's ongoing efforts to continuously enhance its safety performance and safety culture are detailed in this Gas Safety Plan.

Significant revisions to SDG&E's 2025 Gas Safety Plan are summarized in the table attached to this letter and are also highlighted in yellow within the Plan. Please contact Alex Hughes at (213) 671-1344 or AHughes@SoCalGas.com if you have any questions regarding our submission.

Sincerely,

Summary of New or Significantly Changed Elements

SDG&E's Gas Safety Plan has been reviewed in its entirety with updates to reflect current practices, regulations, etc. included throughout the document. The table below summarizes the portions of SDG&E's 2026 Gas Safety Plan that are new or have significantly changed and are included within this submission.

Chapter	New or Significantly Changed Element
Chapter I: Introduction	• Removed introductory sections throughout document that cited regulatory requirements of Plan contents • Updated language on SDG&E's Safety Management System • Updated Figure 1, SMS Framework • Removed Figure 2, SMS Governance Structure
Chapter II: Leadership Commitment to Safety	• Unchanged
Chapter III: Plan Development & Implementation	• Expanded narrative and updated efforts on stakeholder contribution process
Chapter IV: Safety Systems	• Reorganized section to improve narrative flow • Removed Facilities Integrity Management Program as a stand-alone section; incorporated into Continuing Operations • Updated section to reflect Pipeline Safety Enhancement Project status • Updated Damage Prevention section • Added new section outlining the Control Center Modernization Project • Added new section highlighting SDG&E's Gas Safety Center and Gas Safety Subcommittee
Chapter V: Emergency Response	• Added new section on gas filled occupancies based on stakeholder input
Chapter VI: State and Federal Regulations	• Updated Figures 3 and 4
Chapter VII: Continuing Operations	• Consolidated and reorganized sections on Enterprise Risk Management to avoid duplication • Updated cybersecurity section
Chapter VIII: Emerging Issues	• Updated references to regulations and regulatory proceedings
Appendix: Safety Policy Documents	• Updated Policy Document Matrix

Table of Contents

I. INTRODUCTION

San Diego Gas & Electric Company (SDG&E or Company) defines safety as the presence of controls for known hazards, actions to anticipate and guard against unknown hazards, and the commitment to continuous improvement of our ability to recognize and mitigate hazards. Safety is integral to who we are and embedded in everything we do, requiring constant leadership commitment and active workforce engagement. SDG&E's safety commitment applies to public safety,[1] system safety,[2] employee safety,[3] and contractor safety.[4]

SDG&E's commitment and dedication to safety is founded upon and guided by our Company's core values:

- Do the right thing
- Champion people
- Shape the future

This Gas Safety Plan outlines the overarching plans, programs, policies, standards, and procedures designed to support this pledge. This document describes the Company's comprehensive Safety Management System (SMS) framework. As detailed below, the SDG&E SMS framework bolsters SDG&E's enduring commitment to safety by promoting the deliberate and intentional integration of our safety systems and processes. SDG&E's SMS applies this model of safety with an enhanced focus on proactive and predictive risk identification and an increased emphasis on psychological safety and safety culture for continuous public, employee, contractor, asset, system, and cyber safety improvement. This comprehensive view of safety necessitates strong, ongoing, and visible leadership commitment and workforce engagement. SDG&E's safety philosophy is rooted in our values and commitment to continuous improvement, fostering an environment where we are constantly searching for ways to listen, learn, and enhance our practices. Consequently, both the Gas Safety Plan and the SMS Governance Plan are dynamic documents, subject to continual review and update.

1. PURPOSE

According to the Commission, "the rationale for developing a gas safety plan is to motivate a gas utility to reflect upon its existing methods and for it to change, to optimize, or to enhance the existing methods… and the lessons learned from the San Bruno incident, as appropriate, to ensure that the gas utility has a prudent plan in place to protect public safety and worker safety."[5] The gas safety plan "conveys the Executive Officer's safety performance expectations, policy principles, and goals/objectives for the gas

[1] Safety systems and processes focused on protection of our customers' and the public (i.e., Emergency Management, Environmental Safety, Customer Data Privacy, Accessibility, and protection of the public from harm caused by our operations or our assets).
[2] Safety systems and processes associated with the design, construction, operation, inspection and maintenance of SDG&E's assets, facilities, or infrastructure.
[3] Safety systems and processes focused on the health and safety of our employees. This includes safety policies, programs, and training.
[4] Safety systems and processes focused on the safety and protection of our contractors and subcontractors who provide services to support SDG&E assets and operations.
[5] D.12-04-010 at p. 19.

utility's safety performance."[6]

SDG&E has designed this Gas Safety Plan in compliance with legislative and Commission directives to implement "the policy of the state that the commission and each gas corporation place safety of the public and gas corporation employees as the top priority."[7] Beyond meeting regulatory requirements, SDG&E's Gas Safety Plan annual review process serves as a valuable opportunity to assess current practices and identify areas for continuous safety improvement.

2. GAS SAFETY PLAN STRUCTURE

Public Utilities Code Sections 961 and 963 require that the gas system operator safety plans establish how the utility will achieve certain specified goals, and the Commission has organized these goals into five overall categories: (1) safety systems, (2) emergency response, (3) state and federal regulations, (4) continuing operations, and (5) emerging issues. This Gas Safety Plan follows this organizational structure as outlined by the Commission and is divided into sections corresponding to these five categories, with each section representing a required Gas Safety Plan element or other significant element or aspect of the Gas Safety Plan. The requirements of section 956.5 are addressed within the category of emergency response.

Within its Safety Management System, SDG&E has numerous safety programs, plans, and procedures in place that address specified infrastructure or areas of company activity. The intent of the Gas Safety Plan is to provide an overview that encompasses all the plans, programs, and policies, as well as affirm SDG&E's commitment to safety and to advancing a comprehensive SMS framework.

The Appendix provides a listing of the safety program components discussed in the Gas Safety Plan.

3. SAFETY MANAGEMENT SYSTEM

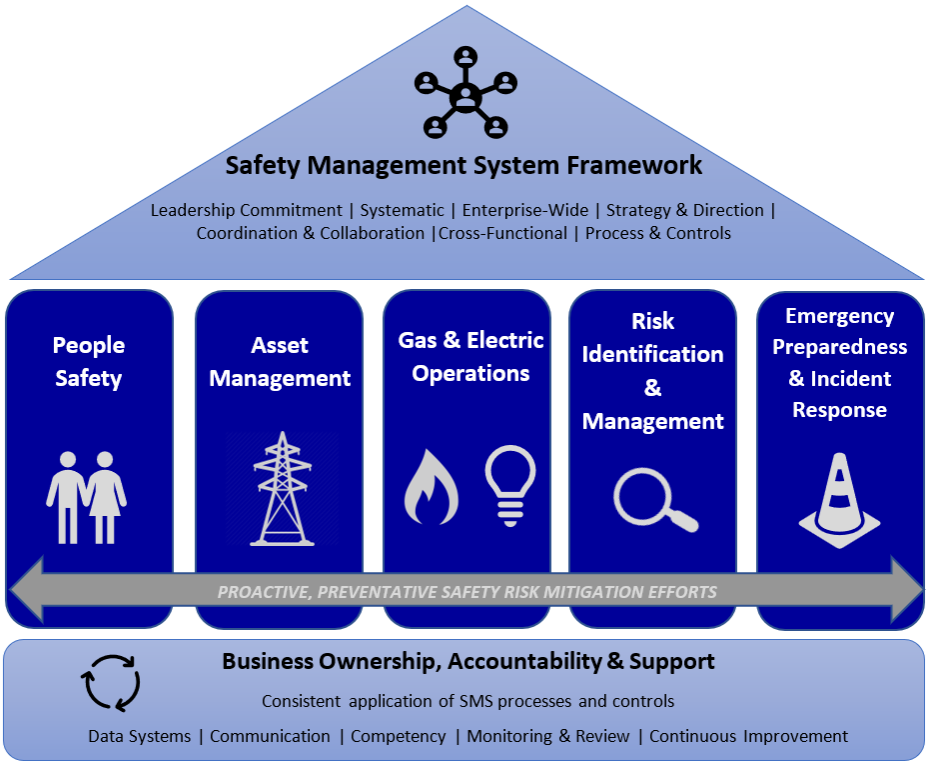
The SDG&E SMS, which was initially formalized in 2020, is a systematic framework for proactive identification and mitigation of safety risk and promotion of continuous safety improvement. The SMS integrates asset, risk, emergency, and safety management into everything we do and is foundational to who we are – from initial engineering and design, employee training, installation, operation, and maintenance of our utility infrastructure, to the safe and reliable delivery of service to our customers – following the Plan-Do-Check-Act Cycle of continuous improvement.

The SMS encompasses systematic, company-wide procedures for effective risk-based decision-making in daily operations. It aligns operational safety for gas and electric services with American Petroleum Institute Recommended Practice (API RP) 1173, incorporating elements from International Organization for Standardization (ISO) 31000 for risk management, ISO 55000 for asset management, and the Incident Command System for emergency management, along with Occupational Safety and Health Administration (OSHA) occupational safety principles. This comprehensive approach fosters a proactive and preventative safety program to continually enhance safety for employees, contractors, and the communities we serve.

[6] Id.
[7] Pub. Util. Code section 963.

SDG&E's SMS governance structure is comprised of a cross-functional team including leaders from gas operations, electric operations, employee safety, contractor safety, customer safety, public safety, asset management, risk management, and emergency management. These leaders form an integrated governing body representing the Five Pillars of Safety within the SMS Framework (Figure 1 below).

Figure 1
SDG&E's Safety Management System Framework



Central to this integrated and risk-informed methodology are the core pillars, built on fundamental safety and process safety management principles. The SMS integrates actions to identify and address risks throughout its framework effectively.

The SDG&E SMS framework is governed by an SMS Executive Steering Team and an SMS Governance Team, comprised of cross-functional leadership. This federated governance structure allows for collective risk and safety management, while maintaining risk accountability at operational levels. Operational employees provide input and feedback on safety matters, which the SMS Governance Team addresses within their scope and authority, as outlined in SDG&E's Safety Management System Governance Plan.

SDG&E's Chief Safety Officer bears ultimate accountability for safety, co-chairing the SMS Executive Steering Team alongside the Chief Risk Officer. The SMS Governance Team is led by the Director of Safety, who reports directly to the Chief Safety Officer.

SDG&E's SMS Executive Steering Team directs the development, implementation, ongoing maintenance, and continuous improvement of the SMS. This team sets Company-wide safety performance metrics and oversees annual safety performance reviews. The SMS Governance Team oversees and refines the system according to the ten essential elements of API 1173:

1. Leadership and Management Commitment
2. Stakeholder Engagement
3. Risk Management
4. Operational Controls
5. Incident Investigation, Evaluation, and Lessons Learned
6. Safety Assurance
7. Management Review and Continuous Improvement
8. Emergency Preparedness and Response
9. Competence, Awareness, and Training
10. Documentation and Record Keeping

These elements are executed through the Plan-Do-Check-Act model illustrated in Figure 2, below. A key objective of the SMS is to integrate, monitor, and assess the effectiveness of safety systems and processes, continually strengthening the company's safety culture through continual review, learning, and improvement.

Figure 2
SDG&E's Integrated Plan-Do-Check-Act Model

4. PLAN REVIEW AND MODIFICATIONS

Public Utilities Code section 961 establishes that gas corporations shall review and update their gas safety plans at an annual frequency period not to exceed 15 months. The program owners must provide justification for any deviation from this review schedule. SDG&E last published an updated Gas Safety Plan on March 14, 2025, and is therefore in compliance with this review schedule.

II. LEADERSHIP COMMITMENT TO SAFETY

At SDG&E, safety is a core value, covering our employees, customers, infrastructure, and physical and cyber systems. This commitment has been a cornerstone for over 130 years, guiding our programs and practices.

Leadership at SDG&E leads by example, promoting a culture of safety throughout the Company. They are dedicated to operational excellence and have established a Board Safety Committee for greater oversight. SDG&E executives assigned as an Officer in Charge of the Emergency Operations Center (EOC) receive foundational Incident Command System (ICS) training including Federal Emergency Management Agency (FEMA) ICS 100, 200, and 700, as well as the State of California's Standardized Emergency Management Systems Overview training. Supervisors also engage in three-hour safety leadership training as part of Essentials of Supervision.

SDG&E's safety expectations can be described by the following Commitment to Safety statement that every member of our leadership wholeheartedly endorses:

> ***SDG&E's longstanding commitment to safety focuses on three primary areas – employee/contractor safety, customer/public safety, and the safety of our gas and electric delivery systems. This safety focus is embedded in what we do and is the foundation for who we are – from initial employee training, to the installation, operation and maintenance of our utility infrastructure, and to our commitment to provide safe and reliable service to our customers.***
>
> ***-- SDG&E's Commitment to Safety***

SDG&E's dedication to operating a safe utility is reflected in its voluntary adoption of a company-wide Safety Management System, based on the safety guidelines outlined in American Petroleum Institute Recommended Practice 1173 (API RP 1173). SDG&E takes a comprehensive approach to asset management, risk assessment, and safety protocols, and will integrate additional SMS principles as they are relevant.

1. POLICY PRINCIPLES AND PERFORMANCE EXPECTATIONS

SDG&E's commitment to safety and its supportive organizational framework enables the Company to proactively manage the safe and reliable delivery of natural gas and related services. The Company aims to create an environment where employees at all levels, along with contractors, can voice concerns about pipeline infrastructure, risks, hazards, customer safety, contractor safety, and employee safety. They can also suggest improvements through different platforms such as local Safety Committees, the Executive Safety Committee, and web-based and mobile applications for reporting near misses and close calls. All employees are empowered and encouraged to "Stop the Job" whenever unsafe conditions are perceived.

SDG&E regularly monitors and evaluates its safety performance in compliance with state and federal regulations, alongside additional metrics to maintain a culture of continuous safety improvement. These

metrics are reviewed and reported according to schedules outlined in policies, programs, plans, or other documents that are part of the Gas Safety Plan.

Additionally, SDG&E keeps track of updates on the U.S. Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) website for new regulations and advisories, supporting timely action and integration of these changes into policies, standards, procedures, and employee training.

The Company frequently assesses its safety culture, fostering open communication between employees and management to identify and manage safety risks. Management has implemented various methods for employees to report and share incidents and close calls/near misses, promoting ongoing learning and improvement.

SDG&E equips employees with necessary training, awareness, and competence to perform their duties safely, as further detailed in Section VII.3. This commitment extends to contractors through SDG&E's Contractor Safety Management activities. Contractor safety performance is continually monitored to promote alignment with our safety focus and the integrity of the gas and electric delivery systems. SDG&E's Contractor Safety Services team oversees contractor safety performance and continually engages with contractors to promote safe work practices. Contractors are informed about operational, regulatory, and procedural changes affecting their work, and feedback from contractor-identified safety issues and near miss incidents is encouraged. SDG&E's Contractor Safety Services team hosts quarterly safety meetings, shares monthly newsletters, and issues incident debriefs and lessons learned following internal and external safety incidents to promote a shared culture of safety with our contractor workforce.

2. GOALS AND OBJECTIVES

SDG&E establishes annual safety goals and is committed to continually enhancing its safety practices. SDG&E leadership and management are responsible for supporting, implementing, and overseeing safety across the organization, including employee, contractor, customer, public, and gas and electric system safety. This commitment to safety is reinforced by communicating its importance and demonstrated by modeling SDG&E's safety values.

This Gas Safety Plan is a Company policy that SDG&E leadership fully supports as part of their safety commitment.

III. PLAN DEVELOPMENT AND IMPLEMENTATION

This section describes SDG&E's efforts to solicit internal and external stakeholder input and engagement in the annual Gas Safety Plan development process.

1. INTERNAL STAKEHOLDER GAS SAFETY PLAN CONTRIBUTION PROCESS

When it comes to safety, we all have a role to play. Safety is a shared responsibility at SDG&E, with employees playing a vital role in proactive risk identification. All employees are empowered to halt operations if they perceive any unsafe conditions or deviations from the planned procedures. Additionally, employees can report near misses when they encounter risks, hazards, close calls, or good catches. Effective two-way communication is a cornerstone of SDG&E's Safety Management System, with safety values and leadership commitment cascading from top executives to all employees and established processes and means for all employees to communicate to leadership.

The five pillars and ten essential elements that form the foundation of our SMS underscore the importance of employee and stakeholder engagement, ensuring clarity in policies, goals, and procedures. Employees significantly contribute to this Gas Safety Plan by raising concerns and making safety recommendations, which is essential for continual improvement through gathering input from those closest to the work.

To foster a culture of trust and encourage reporting of known safety risks, the Company supports employee involvement in enhancing the Gas Safety Plan. This plan is accessible on the company intranet and is updated annually. The intranet also facilitates the submission of pipeline and occupational safety risks and improvement ideas, allowing for anonymous reporting as well.

Company communication strategies highlight the availability and importance of SDG&E's Gas Safety Plan and the necessity of reporting safety risks, integrated into training materials. In October 2025, SDG&E's Chief Safety Officer issued a communication, together with SoCalGas's Chief Safety Officer, requesting stakeholder input in relation to the development of the Companies' respective 2026 Gas Safety Plans.

Since January 2023, SDG&E has hosted annual "Start Strong" safety events for its operational workforce, demonstrating partnership with its Union (IBEW Local 465) and reaffirming a commitment to safety while setting goals for the year. These events aim to reinforce psychological safety, empower employees to voice concerns, submit near misses, and stop unsafe tasks. Also starting in 2023, SDG&E began holding regular Gas Working Foremen Summits to gather feedback from its operational workforce. These summits, led by Gas Operations leadership, provide updates, offer training, and solicit input to improve department goals and pipeline operations. Regular Gas Safety Subcommittee (GSS) meetings also feature cross-functional workforce (including Union) representation to discuss and address safety concerns. SDG&E's Gas Safety Plan annual review process was presented and discussed during the January 2026 GSS meeting. Employee input and feedback received during this meeting has been incorporated into this 2026 Gas Safety Plan.

SDG&E's near miss reporting program provides employees with the means to report hazards, risks, close calls, good catches, and near misses via an online portal or mobile app, with submissions reviewed and tracked for safety improvement opportunities. Meetings with employees promote ongoing attention to

safety issues, supported by regular safety council meetings, supervisor field visits, Gas Safety Center Field Safety Engagements,[8] and Behavior Based Safety (BBS) peer observations.[9]

Quarterly Executive Safety Council and Risk Council meetings, operational safety standdowns, an Annual Safety Congress and Safety Leadership Award Ceremony further promote safety initiatives, solicit feedback, and recognize employees who exemplify the Company's safety vision. To maintain continual process improvement, a post-incident After-Action Review program solicits input from internal stakeholders, with action plans reviewed quarterly by executive leadership.

SDG&E's Gas Safety Plan is reviewed and updated annually and available to all employees online.

2. EXTERNAL STAKEHOLDER SAFETY PLAN CONTRIBUTION PROCESS

To foster a culture of trust and enhance the likelihood of reporting known pipeline or occupational safety risks, SDG&E actively involves its contractors and other external stakeholders in the ongoing improvement of the Gas Safety Plan.

Communication with external stakeholders (*e.g.*, the public, first responders, and public officials) is coordinated through SDG&E's Public Awareness Plan[10] and public liaison program.[11] For significant projects and programs, a dedicated outreach and communication plan is established to gather input, including safety-related feedback, from the community and other stakeholders.

The goal of the Public Awareness Plan and public liaison program is to enhance safety by increasing awareness of the presence of pipelines with the objectives to:

- Enhance safety through increased public awareness and knowledge sharing;
- Reduce third-party damage to pipeline infrastructure with proactive outreach; and
- Facilitate greater understanding of first responder and utility roles and responsibilities in effective pipeline emergency response.

These objectives are achieved by educating the public on:

- The existence and purpose of pipelines;

[8] SDG&E's Field Safety Engagements are documented reviews of activities where high-energy hazards are present to confirm the appropriate direct controls are in place to reduce or eliminate exposure and mitigate the risk of serious injuries and fatalities. This new leading metric introduced in 2024, aligns with industry best practices utilizing a standard methodology to conduct High-Energy Control Assessments (HECA), and the Edison Electric Institute (EEI) Safety Classification and Learning (SCL) Model. Field Safety Engagements are measured as a sum of each documented high-energy exposure assessment completed. SDG&E's Safety department and Gas Safety Center collaborate with field operations groups to identify, plan, and conduct these high-energy exposure reviews.

[9] SDG&E's Behavioral Accident Prevention Process (BAPP®), also referred to as "BBS," is a proactive approach to safety and health management, which recognizes at-risk behaviors as a frequent cause of both minor and serious injuries. BAPP is an employee driven safety process with partnership between management and employees that continually focuses people's attentions and actions on their, and others, daily safety behavior to identify safe and at-risk behaviors. The peer observation program utilizes a behavior inventory checklist to track safety behaviors and foster dialog on safe and at-risk behaviors, with recommended behavioral safety changes to promote safe work practices.

[10] SDG&E's Public Awareness Plan includes SDG&E's natural gas safety education campaign that provides outreach to various stakeholders regarding general safety and specific infrastructure projects that impact a particular area or group.

[11] Additional detail on SDG&E's public liaison program can be found at www.sdge.com/safety/sdge-first-responder-liason-activities.

- Use of a one-call notification system prior to excavation and other damage prevention activities;
- Possible hazards associated with unintended releases from a pipeline facility;
- Physical indications that such a release may have occurred; and
- Steps that should be taken for safety in the event of a pipeline release and procedures to report such an event.

SDG&E's contracted workforce is integrated within our Safety Management System. The Company's Contractor Safety Program incorporates feedback from contractors on occupational and pipeline safety risks at SDG&E. The Company promotes a speak-up culture and contractors receive training on SDG&E's reporting policy and procedures. This program centralizes the focus on contractors, aligning Business Units and Class 1 Contractors under the same requirements via the Contractor Safety Program Standard G8308 and the Class 1 Contractor Safety Manual. Internal construction-focused Business Units and Contractor Safety Services oversee field safety for all construction work performed by contracted groups. This oversight verifies that contracted work complies with SDG&E standards, state and federal regulations, applicable laws, and Commission Orders.

Contractor feedback is highly valued and essential for continuous improvement. SDG&E promotes two-way communication with its contractors to exchange safety information such as near misses, incident alerts and reporting, incident debriefs, and monthly newsletters. Moreover, SDG&E leadership conducts safety connection touchpoints with contractor leadership to identify proactive and preventive solutions, lessons learned, and opportunities for safety enhancement. The following outlines SDG&E's process management for collecting and analyzing contractor and external stakeholder input regarding pipeline safety:

- Public Awareness Plan
- Public Liaison Program
- Damage Prevention Program
- Contractor Safety Program
- ISNetworld (ISN) for Class 1 Contractor safety vetting
- Contractor field safety observations and inspections
- Quarterly Contractor Safety Meetings and Annual Contractor Safety Summit
- A Contractor Safety Scorecard[12]
- Contractor Near Miss reporting and distribution
- Incident Alerts and Contractor Debriefs
- California Alliance for Safety and Training (CAST) participation.[13]

[12] The Contractor Safety Scorecard consists of SDG&E-specific safety metrics to support identification of safety-related gaps. These data are updated monthly and communicated to SDG&E business unit representatives for situational awareness.
[13] CAST members share information regarding safety incidents, lessons learned and industry best practices. Current members include representatives from SDG&E, SoCalGas, Southern California Edison and Pacific Gas & Electric Company.

SDG&E's Gas Safety Plan is publicly available on its external website for viewing by all members of the public and third-party Contractors.

IV. SAFETY SYSTEMS

1. SAFETY MANAGEMENT SYSTEM

As described in Section I.3 above, SDG&E manages safety risk within its Safety Management System. SDG&E's SMS is a process-based, integrated, continuous improvement framework aimed to reduce risk, enhance the Company's safety culture, and prevent safety incidents. The collective efforts at the business unit and enterprise levels become more aligned, integrated, and systematic within the SMS framework (see Figure 1, above). SDG&E's SMS provides a standardized approach for managing risk and safety across all assets and operations by implementing processes and risk assessment methodologies that can be applied consistently enterprise wide. The SMS framework creates an integrated approach and a Company-wide resource to guide our actions, decisions, and behaviors, so that risk is efficiently and effectively managed, and our safety culture and safety performance continually improves.

SDG&E's SMS aligns with the American Petroleum Institute's (API) Recommended Practice for Pipeline Safety Management System (API 1173). While API 1173 was developed for natural gas pipeline operators, SDG&E adapted this recommended practice for broader electric and gas utility application. Accordingly, absent an electric industry-equivalent, SDG&E applies this adapted version of API 1173 to both its gas and electric operations. For example, throughout its SMS SDG&E added elements specific to wildfire mitigation that are not found in API 1173. As noted in section I.3 above, SDG&E's SMS also incorporates elements of the following guidelines and standards:

- International Standards Organization (ISO) 31000: Risk Management;
- ISO 55000: Asset Management: Overview, Principles, and Terminology;
- ISO 55001: Asset Management: Management Systems – Requirements;
- ISO 22320 and the Incident Command System: Emergency Management; and
- OSHA Occupational Safety Standards: Employee and Contractor Safety.

These integrated elements together support the development of a comprehensive and proactive safety program that produces ever-improving levels of safety.

2. PIPELINE SAFETY MANAGEMENT

SDG&E has plans and programs that identify and minimize hazards and systemic risks in pipeline infrastructure and promote personnel, system, environmental, and public safety. These plans and programs are integral parts of our approach to safety and include the following:

Transmission Integrity Management Program (TIMP)	The TIMP was established in accordance with 49 Code of Federal Regulations (CFR) Part 192, Subpart O, to address safety-related risks on SDG&E's natural gas transmission system.
Distribution Integrity Management Program (DIMP)	The DIMP was established in accordance with 49 CFR Part 192, Subpart P to address safety-related risks on SDG&E's natural gas distribution system.
Operation and Maintenance Plan	The Operation and Maintenance (O&M) plan is a compendium of policies designed to comprehensively address the safe operation

	and maintenance of SDG&E facilities.
Pipeline Safety Enhancement Plan (PSEP)	The PSEP was established in response to a Commission rulemaking (later codified as Public Utilities Code §§ 957 and 958), that mandated operators to: strength test or replace transmission pipelines that have not been adequately tested or for which traceable, verifiable and complete records of a strength test are not available; retrofit transmission pipelines to accommodate inline inspection; and install automated valves.[14]
Gas Safety Enhancement Programs (GSEP)	The GSEP are safety-related programs developed and established in response to various safety-related regulations effectuated by PHMSA (*e.g.*, Gas Transmission Safety Rule [GTSR], Valve Rule).
Control Room Management Plan (CRMP)	The CRMP is established in accordance with 49 CFR §192.631 to address safety requirements for controllers, control rooms, and SCADA systems used to remotely monitor and control pipeline operations.
Gas Damage Prevention Program	SDG&E's Damage Prevention Program protects our underground gas, electric, and fiber optic infrastructure from damage caused during excavation activities. This helps maintain the safety of our system, employees, and the public.
Gas Safety Center (GSC) and Gas Safety Subcommittee (GSS)	The GSC is a dedicated safety team that focuses on safety topics, concerns and improvements specific to Gas Distribution. The GSC partners with SDG&E's centralized safety department and its field safety advisors. The GSS, a sub-committee of the Executive Safety Council (ESC), was created in 2015 and is dedicated to fostering a strong safety culture within gas operations.

3. TRANSMISSION INTEGRITY MANAGEMENT PROGRAM

The Transmission Integrity Management Program (TIMP) was developed to enhance pipeline safety through regular assessments and risk mitigation on transmission pipelines. Initially developed in 2004 to comply with Subpart O of Part 192 of Title 49 of the CFR, and recently updated to comply with 49 CFR § 192.710, which was newly incorporated through Part 1 of the Gas Transmission Safety Rule (GTSR),[15] the TIMP is designed to assess and enhance the integrity of transmission pipelines in High Consequence Areas (HCAs), Moderate Consequence Areas (MCAs) and other applicable areas[16] through the identification and evaluation of threats, assessment of material integrity, and determination and

[14] As of 2025, all identified segments have been strength tested or replaced and will continue to be evaluated under the GSEP.

[15] 84 FR 52180 – "Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments."

[16] 49 CFR § 192.710(a). High Consequence Areas, or HCAs, are pipelines located in class 3 or class 4 locations, or class 2 & class 1 where the potential impact radius (PIR) exceeds 660-ft and the impact circle contains ≥20 buildings for human occupancy, or contains an identified site (e.g., schools, hospitals, rec area, etc.). Moderate Consequence Areas, or MCAs, are defined as a pipeline with a PIR that contains ≥5 buildings or major roadway (≥4 lanes). It identifies locations where a pipeline failure could still pose a risk to people/infrastructure even in areas outside of an HCA.

implementation of preventive and mitigative actions and is continuously reviewed and improved.

The TIMP integrates information about the pipeline's physical, operating, environmental, and performance history into a comprehensive evaluation. This analysis is used to develop specific integrity-related assessments, applied at intervals no greater than seven years for pipelines in HCAs and no greater than ten years for pipelines in MCAs subject to 49 CFR § 192.710.

Risk evaluations and subsequent integrity activities for DOT-defined Transmission segments under the TIMP are designed to identify and address safety concerns and are conducted in accordance with federal requirements. The GTSR, Part 2, expanded threat identification, corrosion control standards, and integrity assessment requirements, which now require operators to use additional diagnostic tools, enhanced inspection methods, and improved monitoring capabilities to identify and evaluate system threats more comprehensively. SDG&E uses several methods to assess pipelines, including in-line inspections (ILI), pressure testing, and direct assessment, with ILI being the preferred method due to its generation of comprehensive data sets pertaining to the pipe segments. Of the total transmission pipelines in the SDG&E system, approximately 157 miles (~72%) are evaluated using ILI methods. TIMP assessments support the safe operation of the transmission system through recurring assessment and remediation of pipelines, as well as the incorporation of preventive and mitigative measures, including corrosion control and damage prevention. The TIMP is continuously reviewed and improved to maintain its effectiveness in managing pipeline safety.

SDG&E implements TIMP in accordance with our written plan: a collection of internal policy documents that detail how the safety and integrity of our transmission pipeline system is managed, enhanced, and improved. The written TIMP plan also outlines procedures and processes to address each required program element and referenced industry standards (*e.g.*, API RP 1173, ASME B31.8S and NACE SP0502-2008).

4. DISTRIBUTION INTEGRITY MANAGEMENT PROGRAM

The Distribution Integrity Management Program (DIMP), initially developed in 2010, complies with Subpart P of Part 192 of Title 49 of the CFR. The DIMP is designed to enhance distribution pipeline safety by identifying threats, evaluating and ranking risks, and developing measures to reduce risks on the system.

SDG&E integrates data from various sources for risk analysis and uses a data-driven approach to develop measures that reduce the likelihood and consequences of pipeline failures. SDG&E also measures the performance of the DIMP, continually evaluating its effectiveness, and implements improvements as appropriate. In 2022, the company began improving existing DIMP vintage pipeline replacement activities that mitigate risk associated with plastic pipelines, such as manufacturing defects. Using internal and publicly available industry data sources, SDG&E is shifting from using relative risk analysis to segment-specific quantitative risk results to inform replacement activities.

5. OPERATION AND MAINTENANCE PLAN

SDG&E's Operation and Maintenance (O&M) plan consists of more than 175 policies designed to address the safe operation and maintenance of our facilities, in accordance with 49 C.F.R. §192.605, "Procedural manual for operations, maintenance, and emergencies." These policies include, but are not limited to,

various processes, such as pipeline operation, corrosion control, record availability, pipeline startup and shutdown, compressor station maintenance, operator qualification, procedure review, excavation safety, and control room management.
This O&M plan includes policies that address:

- Operating, maintaining, and repairing pipelines and pipeline components;
- Controlling corrosion on pipelines and surface facility equipment;
- Availability of construction records, maps, and operating history;
- Start up and shut down of pipelines;
- Maintenance and operation of compressor stations;
- Operator Qualification;
- Review of procedures to determine effectiveness and adequacy;
- Safety procedures for excavation;
- Maintenance of electrical equipment in accordance with National Fire Protection (NFPA) 70B; and
- SoCalGas Control room management of the SDG&E system.

The O&M plan resides within SDG&E's online document management repository and is reviewed annually to verify that the included policies and procedures remain in compliance with the requirements of the relevant sections of Title 49 of the Code of Federal Regulations (CFR).[17] These policies and procedures are updated throughout the year in response to evolving regulations, technological advancements, and other drivers of operational improvement.

Each Gas Standard referenced within the O&M plan is subject to SDG&E's data governance process and undergoes a comprehensive functional review by the identified Responsible Person (RP) at least once every five years in compliance with the CFR.[18] Training programs are reviewed in the same timeframe as associated gas standards, so employees are aware of and perform tasks safely and in accordance with current requirements. To help employees remain safe and knowledgeable of critical policies and procedures, including those related to safety, annual refresher training is provided to operations personnel to reinforce awareness of critical safety policies and procedures.

The documents referenced by the O&M plan comprehensively address the safe operation and maintenance of our facilities, identify and prescribe activities to minimize risks, and document infrastructure history through meeting and documenting code/regulation compliance, promoting safety and operational excellence, and minimizing the potential for and consequences associated with unplanned events, such as equipment failure or operator error.

[17] 49 CFR § 192.605.
[18] 49 CFR § 192.605(b); Management of Company Operations Standards, PP01.001SD.

6. PIPELINE SAFETY ENHANCEMENT PLAN

In 2011, the CPUC issued D.11-06-017 (in rulemaking (R.) 11-02-019), which ordered all California natural gas transmission pipeline operators to prepare and file implementation plans to replace or pressure test all transmission pipelines that have not been adequately tested or for which reliable records are not available. These requirements were later codified as Public Utilities Code Sections 957 and 958.

In response, SoCalGas and SDG&E submitted its joint Pipeline Safety Enhancement Plan (PSEP).[19] The PSEP is a systematic effort to test or replace transmission pipelines that do not have sufficient documentation of a pressure test to at least 1.25 times the Maximum Allowable Operating Pressure (MAOP). PSEP employs a risk-based prioritization methodology and includes replacement of pre-1946 pipe that cannot be assessed using in-line inspection tools, and enhancement of valve infrastructure.

The primary objectives of the PSEP are to: (1) enhance public safety; (2) comply with Commission directives; (3) minimize customer impacts; and (4) maximize the cost effectiveness of safety investments.

PSEP's key elements include:

- Criteria (Decision Tree) to determine whether to test or replace transmission pipelines that do not have sufficient documentation of a pressure test to at least 1.25 times the MAOP;
- A two-phased approach and prioritization of pipelines operated in more populated areas (Phase 1A) ahead of pipelines in less populated areas (Phase 2A);
- Replacement of pipelines installed prior to 1946 that cannot be assessed using in-line inspection tools, i.e., "non-piggable" pipelines (Phase 1B);
- Interim safety enhancement measures; and
- Enhancement of valve infrastructure through the retrofit of existing valves and installation of additional remotely operated and automated shutoff valves.

The PSEP also includes measures to enhance the pipeline system through retrofitting pipelines and valves with existing and emerging technologies to provide advance warning of potential pipeline failure and decrease the time to identify, investigate, prevent, remedy, or manage the effects of such an event. The work required by the PSEP is complete at SDG&E. As of 2025, all pipeline segments and valve automation projects subject to the requirements of the PSEP have been pressure tested or replaced.

7. GAS SAFETY ENHANCEMENT PROGRAMS

In SDG&E's Test Year (TY) 2024 General Rate Case (GRC), SDG&E proposed a portfolio of gas safety enhancement programs that are designed to comply with new PHMSA rulemakings resulting from the PIPES Act of 2011 and successive reauthorizations.[20] Current rules that have taken effect and have driven incremental safety enhancements include the following:

- **"Pipeline Safety: Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments" Rulemaking:** PHMSA published this final rule on October 1, 2019. With various parts taking effect July 1, 2020, and

[19] As approved by D.14-06-007.
[20] D.24-12-074, pp. 279-280.

July 1, 2021, the rule strengthened record-keeping requirements and added entirely new sections to the code, requires operators to reconfirm pipeline maximum allowable operating pressure (MAOP) for pipeline segments without traceable, verifiable, and complete records; establishes an opportunistic material properties and attributes verification procedure; and expands integrity assessment requirements beyond segments in high consequence areas. Requirements associated with and/or impacting the TIMP are discussed in section IV.2. of this plan.

- **"Safety of Gas Transmission Pipelines: Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, and Other Related Amendments" Rulemaking**: PHMSA published this final rule on August 24, 2022, which took effect May 24, 2023, with a limited enforcement discretion order extending the effective date of changes associated with various sections to February 24, 2024. The rule added new requirements for pipeline segments that impact the TIMP (Section IV.2.) as well as requirements that enhance the safety of transmission pipelines through increased corrosion control and extreme weather event response measures and expanded management of change activities.

- **Pipeline Safety: Requirement of Valve Installation and Minimum Rupture Detection Standards Final Rule:** PHMSA published this final rule on April 8, 2022, which went into effect on October 5, 2022. The rule requires operators to install rupture mitigation valves (RMVs) on newly constructed or "entirely replaced" transmission pipeline segments with diameters of 6 inches or greater and perform risk analyses annually to identify RMV installation opportunities. Additionally, the rule requires operators to strengthen incident investigation requirements and establish procedures for rupture identification and response measures, which are discussed in more detail in Section V of this plan.

8. CONTROL ROOM MANAGEMENT PLAN

On December 3, 2009, PHMSA published the Control Room Management/Human Factors final rule in the Federal Register as 49 CFR §192.631, *Control Room Management*, which went into effect on February 1, 2010. These safety regulations prescribe safety requirements for controllers, control rooms, and SCADA systems used to remotely monitor and control pipeline operations.

In response, SDG&E submitted its Control Room Management Plan (CRMP) in 2010 to comply with 49 CFR §192.631. The CRMP aims to enhance the performance reliability of operator personnel that control pipeline operations by:

- Defining the roles and responsibilities of controllers and providing controllers with the necessary information, training, and processes to fulfill these responsibilities.
- Implementing methods to prevent and manage controller fatigue according to an established fatigue management plan.
- Managing SCADA alarms and controller workloads according to an established alarm management plan.
- Integrating human factors management into SCADA systems.
- Testing backup SCADA systems and internal communication plans periodically to verify the effectiveness of procedures and equipment if an emergency involving loss of SCADA system

functions occur.

- Assuring control room considerations are taken into account when changing pipeline equipment or configurations.
- Reviewing reportable incidents or accidents to determine whether control room actions contributed to the event.
- Developing team training that provides controllers, and those who operationally collaborate with control room personnel, the skills necessary to address conditions that could occur in any operational mode (normal, abnormal, or emergency conditions).

The CRMP is reviewed annually and is updated throughout the year based on new regulations, revised company policies, internal and external audits, and other factors that drive improvement. Training programs are also reviewed and updated in the same timeframe, so employees are aware of and perform tasks safely and according to the current requirements.

Additionally, SoCalGas has advanced its Control Center Modernization (CCM) project designed to drive operational improvements and safety enhancements across SDG&E and SoCalGas by developing a comprehensive, real-time view of the integrated gas system by further digitalizing and integrating the companies' distribution and transmission gas networks through enhanced remote monitoring, control, and analytic capabilities across both asset types. The CCM initiatives include the following:

- Building a new and modernized gas operations control center facility with expanded functionality such as:
    - A larger control room with robust data visualization capabilities.
    - Increased server/storage needs.
    - A SCADA simulator for operational training.
    - Enhanced fatigue mitigation countermeasures such as a circadian lighting system, sleep rooms and a gym.
- Expanding Gas Control's remote monitoring and control capabilities by integrating the following Pipeline Facility assets into the SCADA system:
    - Distribution Regulator Stations.
    - Electronic Pressure Monitors that monitor Distribution Pressure Zones and Pressure Districts.
    - Fiber Optic Cables along select pipeline to identify third-party intrusion, leaks, and ground subsidence.
    - Methane Sensors installed in "High Consequence Areas" to identify potential leaks and pipeline ruptures.
- Enhancing control room technological capabilities such as
    - Upgrading the SCADA system to improve stability, security, and functionality for control room operations.
    - Developing an extensive electronic logging system to support situational awareness, as well as to support operational and compliance requirements.

- Developing an advanced data analytics platform that leverages machine learning and artificial intelligence capabilities to increase situational intelligence of the gas pipeline system.
- Increasing Gas Control and SCADA department staffing to accommodate the additional monitoring responsibilities and system maintenance of new technologies.

Through these and other efforts, SDG&E continues to improve Gas Control processes, enhancing the safety and efficiency across the SDG&E and SoCalGas integrated gas system.

9. DAMAGE PREVENTION PROGRAM

SDG&E's Damage Prevention Program highlights our commitment to safety through proactive and preventative measures. The program's objective is to protect our underground gas, electric, and fiber optic infrastructure from damage caused during excavation activities. This improves the safety of our system, employees, and the public. When an 811 DigAlert Ticket is created, SDG&E locators go out to the site and mark the location of our gas, electric, and fiber optic underground utility lines to prevent excavation damage and keep our communities safe. The program includes enhanced public outreach to customers and contractors.

SDG&E's Gas Damage Prevention Program follows the SMS Plan-Do-Check-Act Cycle for continuous safety improvement. The driving force of the Damage Prevention team is dedication to employee, contractor, public, and system safety. The focus is not simply on locating our gas and electric facilities, but also partnering with contractors, residential customers, and the broader community to ensure our system is protected.

Public safety requires collaboration and partnership. SDG&E Damage Prevention Analysts (DPAs) engage excavators and homeowners through a variety of informational outreach events to educate on safe digging practices tailored to the specific type of work. DPAs perform damage investigation for every dig-in, including after-hours, further improving our Damage Prevention Program.

SDG&E's Damage Prevention Program is subject to continual review, learning and improvement. In 2025, SDG&E's Damage Prevention team's efforts resulted in a Gas Dig-in rate,[21] of 1.11 per 1,000 Underground Service Alert (USA) tickets, exceeding our annual goal. This team is making a significant difference when it comes to protecting the safety of our communities. More specifically, SDG&E's 2025 Gas Damage Prevention Program included:

- Damage Prevention Analysts that supported:
  - 2,060 non dig-in engagements
  - 51 Outreach events
  - Over 180 Stop-the-Jobs
  - Response to 100% of all Gas Damages

[21] Per D.21-11-009, the Gas Dig-In rate is "[t]he number of 3rd party gas dig-ins per 1,000 Underground Service Alert (USA) tickets. A gas dig-in refers to any damage (impact or exposure) that results in a repair or replacement of underground gas facility as a result of an excavation. Excludes fiber and electric tickets. A third-party dig-in is damage caused by someone other than the utility or a utility contractor."

- Public Awareness Campaign:
  - 15-second 811 commercials played on local cable
  - 811 Billboards throughout San Diego County
  - Banners and signage at local attractions
  - Social media campaign

- Quality Management:
  - In 2025, Damage Prevention Quality Assurance Technicians completed 1,227 post-work reviews, identifying 51 findings and implementing 33 corrective actions to mitigate risks.

- Excavation Damage Investigations & Prevention:
  - 276 detailed excavation damage investigations were conducted in 2025 to recover damage costs and to prevent reoccurrence through contractor and public outreach.
  - 2,060 field contacts affirmed compliance and safety during excavation activities and prevented illegal and unsafe excavation.
  - Notably, 182 contractor excavation jobs were halted by DPAs, preventing potential hazards and saving the company in damage costs.

- 811 Champion Program
  - In 2024, SDG&E launched its 811 Champion Program to empower all SDG&E employees to identify and report an excavation site that may not have an 811 ticket for immediate follow-up by the Damage Prevention team.
  - During 2025, several near misses were reported by employees and contractors who proactively stopped work when proper mark-outs were not present.

10. GAS SAFETY CENTER & GAS SAFETY SUBCOMMITTEE

SDG&E implements two programs specifically focused on increasing psychological safety and sustaining a safety-first culture within its Gas Operations organization. These are the Gas Safety Center (GSC) and the Gas Safety Subcommittee (GSS).

The GSC is a dedicated safety team that focuses on safety topics, concerns, and improvements specific to Gas Operations. The GSC partners with SDG&E's centralized safety department and its field safety advisors. The GSC was developed in 2022 to leverage extensive gas operations field experience to help bolster field safety and to empower front line employees to speak up to one of their own to address any safety issues that were seen in the field. The GSC helps identify potential safety risks and works to mitigate these safety issues and communicate across the Gas Operations organization any safety concerns and remedies that are seen in the field.

The GSS, a sub-committee of the Executive Safety Council (ESC), was created in 2015 and is dedicated to fostering a strong safety culture within Gas Operations. Its mission is to provide a forum for open communication from frontline employees, address safety concerns, and drive continuous improvement in employee, public, and operational safety. The GSS supports the development and dissemination of safe operating practices, consults on proposed health and safety changes, and assists management in prioritizing actions to mitigate hazards and maintain compliance with regulatory requirements.

The GSS promotes gas safety awareness, monitors safety performance, and advises the ESC on improving

the company's safety program. Key responsibilities include identifying and reducing operational risks, preventing injuries, maintaining compliance with safety laws, and recommending tools, equipment, and training to support safe operations. The committee meets monthly to review incidents, track corrective actions, and resolve outstanding issues. Membership includes management and Union-represented workforce representatives from SDG&E's gas district locations and key operational groups, including Gas Maintenance, Emergency Response, Damage Prevention, Street Repair, Traffic Control, Construction, Pipeline Operations, Cathodic Protection, Leakage Mitigation, Instrument Shop, Gas Transmission, Contractor Safety and Customer Field Operations. The GSS includes a roundtable discussion where attendees can raise safety concerns or suggestions. All identified action items are documented, assigned, and tracked through resolution.

V. EMERGENCY PREPAREDNESS & RESPONSE

SDG&E has several programs, policies, standards, and procedures in place so that the company and its employees are prepared to respond to emergencies. These activities are intended to limit damage from accidents and provide timely response to customer and employee reports of leaks, hazardous conditions, and emergency events, such as earthquakes, and establish an effective Incident Command System (ICS) and collaborate with first responder agencies.

1. SDG&E'S GAS EMERGENCY PREPAREDNESS AND RESPONSE POLICY

SDG&E's Gas Emergency Management Preparedness and Response Policy (ER-1 SD) is designed to create a framework for the protection of our employees, contractors, the public, and our infrastructure in the event of a major emergency related to gas pipeline operations safety, health, and environmental protection processes.

The ER-1 SD documents how SDG&E aligns with the emergency response practices detailed in API 1173 and complies with the Public Utilities Code sections 961(d)(5), (6), and (8), as well as the emergency response procedures required by 49 C.F.R. §§ 192.613 and 192.615. It documents how the Company prepares and responds to emergencies by using the PDCA cycle for continuous improvement of our processes. This plan covers the following emergency response elements:

- SDG&E's Emergency Response Organization, including positions and responsibilities of the Emergency Operations Centers, identification of response resources and interfaces, including local emergency responders.
- Emergency Preparedness/Exercises
- Field Services Emergency Plans
- After Action Review Program
- Business Resumption Planning
- Emergency Action and Fire Prevention Plans
- Natural Disasters or Major Emergencies
- Off-Hour Management Coverage
- Mutual Assistance
- Plan maintenance

The policy incorporates by reference SDG&E procedures and documents that collectively comply with the various requirements of 49 C.F.R. § 192.615 (a 1-2), b 1-3), (c 1-4):

- Operator plans, procedures, and notification requirements;
- The responsibility of customer contact centers, which receive customer reports of emergencies and leaks;

- The responsibility of dispatch offices, which act as the central point for receiving and recording information on reportable incidents, emergencies, and natural disasters affecting the company, and which also process internal gas incident notifications;
- The Emergency Incident Tracking System that is used to record reports of damage to SDG&E pipelines or facilities and to log, track, and notify field personnel and others within the company about emergency situations; and
- Establishing and maintaining liaison with first responders, as discussed in section III.2, above.

With PHMSA's amendment to 49 CFR Part 192 through the "Pipeline Safety: Requirement of Valve Installation and Minimum Rupture Detection Standards" final rule on April 8, 2022, the ER-1 SD policy has also been updated to increase coordination with emergency response agencies to enhance public safety and minimize environmental impacts of pipeline ruptures. Additionally, in alignment with the amendments to 49 CFR § 192.613, ER-1 includes procedures for the following activities on transmission pipeline segments with likelihood of damage after extreme weather events:

- Consideration of the nature of the extreme weather event, physical characteristics, operating conditions, location, and prior history in determining the scope of initial inspections
- Communicating with the PHMSA Region Director if the inspection cannot commence within 72 hours after the area can be safely accessed
- Remedial actions to maintain the safe operation of the pipeline based on the inspection which includes but is not limited to:
    - (i) Reducing the operating pressure or shutting down the pipeline
    - (ii) Modifying, repairing, or replacing any damaged pipeline facilities
    - (iii) Preventing, mitigating, or eliminating any unsafe conditions in the pipeline right-of-way
    - (iv) Performing additional patrols, surveys, tests, or inspections
    - (v) Implementing emergency response activities with Federal, State, or local personnel
    - (vi) Notifying affected communities of the steps that can be taken to ensure public safety.

The Gas Emergency Management Preparedness and Response Policy is designed to promote the safety of customers, employees, and communities and the protection of property in the event of a major emergency related to gas pipeline operations safety, health, and environmental protection processes.

SDG&E prepares and maintains written plans and standards that address emergency or disaster situations, including earthquake response. As part of these plans and standards, employees are trained and equipped to respond promptly; direct their actions toward protecting people first and then property; maintain gas service to customers where possible; and restore the affected pipeline system and company operations to normal status following an emergency or disaster.

These plans and standards may include written gas handling plans, alternative gas handling plans, and various considerations when performing gas handling/pressure control, including the operation of critical valves, control equipment, and instrumentation. Employees are to adhere to these plans and standards

when performing these duties and to take precautions to prevent outages, over-pressurization, errors in mapping or planning, and other safety concerns. Employees performing specified tasks are trained on the policies and procedures to complete their duties safely. Business Resumption plans address continuity planning to maintain organizational stability in the event of a major business disruption so that critical functions can continue during and after a disaster with minimal disruption.

Plans for coping with a major emergency include provisions for training. response and recovery, specific responsibility for on-call schedules and duties, inter-organizational assistance, coordination with, and notification of, governmental agencies, media contact, assignments to governmental emergency organizations, and activation of the company's regional Department Operations Center – Gas (DOC-G).

SDG&E's emergency management organization is modeled after the Standardized Emergency Management System (SEMS), which allows for a multi-level emergency response organization. This means that the severity of the incident determines the level of support and resources that are necessary to respond to the event.

SDG&E has three levels of emergency management support:

- Construction and Operations Center Field Level response for routine local emergencies or incidents involving a small number of customers, leveraging a utility-based Incident Command System, as described below. SDG&E's Gas Operations provides 24/7 emergency response and support through our Gas Emergency Department (GED).
- An Emergency Operations Center (EOC), which is for large-scale events that may involve a significant number of customers across regions or an event that may require coordination and communication with multiple internal and/or external organizations (such as significant earthquakes). SDG&E's EOC is staffed with trained personnel to respond to and recover from major emergencies. SDG&E also has a backup EOC in the event the main center becomes inoperative. SDG&E's EOC coordinates responses with SoCalGas' EOC.
- Department Operations Center – Gas (DOC-G) is a crisis management leadership team that coordinates and provides support to the Utility Field Commanders (UFCs) for operations on gas incidents. During an emergency that requires greater support than the capacity of the local field response, the DOC-G is activated to support the field by allowing the field to focus on repair and restoration efforts, while activities such as technical support, logistics, communications, and addressing customer issues are handled by the DOC-G. The DOC-G is located at SDG&E's Greencraig B facility. Depending on the nature of the emergency and assets affected, DOC-G may coordinate responses with the SoCalGas Gas Control Center.

SDG&E maintains and tests its emergency response plan and structure by conducting regular emergency preparedness drills and exercises to promote employee proficiency in emergency assignments and to validate the effectiveness of its emergency plans. These training exercises include external agencies and cover a wide range of threats to employee, public, and pipeline safety. Adequacy of response is evaluated during these emergency exercises, lessons learned are identified and corrective actions are taken, which may include plan or process revisions.

Emergency response plans and procedures are also evaluated as a component of an incident investigation, with lessons learned incorporated into plan or process revisions as needed.

SDG&E has developed and integrated a utility-based Incident Command System into the company's field response structure, Emergency Operations Center, and Department Operations Centers. The Incident Command System (ICS) is a standardized approach to incident management that provides all responders an integrated organizational structure that matches the complexities and demands of the incident and can expand or contract to meet incident needs. This integrated organizational structure outlines communication standards for inter-functional (*i.e.*, Transmission, Distribution, etc.) and interagency (*i.e.*, fire service, law enforcement, Caltrans, etc.) cooperation during an emergency incident and responsibilities within the company.

In addition to Incident Command System training, the company provides "First Responder" training for field management personnel who may respond to emergencies. SDG&E continues to annually train employees in the role of Utility Field Commander, Utility Field Safety Officer, and the ICS. Refresher training in ICS and radio communications is also provided. The training is conducted to help maintain operational safety of all employees responding to gas emergencies.

Plans for routine emergencies differ from a major emergency in that Company personnel respond and address the emergency with no or minimal interaction with other agencies. The Company responds immediately to emergencies. In addition to the immediate response to emergencies, other potentially hazardous conditions reported to the Company are scheduled, dependent upon the specific information reported to the Utility. Emergencies and hazardous conditions are addressed immediately. Those deemed non-hazardous are scheduled based on contributing risk factors. Response times of less than four hours, less than 14 hours and same day have been established for these non-emergency conditions.

A. MUTUAL ASSISTANCE SUPPORT

Mutual assistance is an essential part of a utility restoration process and contingency planning. Mutual assistance agreements (MAAs) and other types of arrangements to assist before, during, and after an emergency event facilitate the rapid mobilization of personnel, equipment, and supplies. Participation in MAAs is an important component of the federal National Incident Management System (NIMS), which is intended to provide a systematic approach to guide governments at all levels, non-governmental organizations, and the private sector in collaborative emergency preparedness and response activities.[22] The mutual assistance network is a cornerstone of a utility's operations during emergencies.

The Company maintains an agreement for mutual assistance with various non-profit organizations, utilities, and certain municipalities such as the California Utilities Emergency Association (CUEA), Western Regional Mutual Aid Group (WRMAG) and the American Gas Association (AGA).

These agreements cover the rights and obligations of those who respond to requests for assistance, as well as guidelines concerning control of the work of personnel involved in the response.

A requesting utility having a major emergency and in need of the Company's assistance, may make a request for assistance. Emergency Management will facilitate and coordinate the activation of mutual assistance through a meeting of the EM Advisor, appropriate commodity directors and the Executive

[22] U.S. Dept. of Homeland Security. National Incident Management System (December 2008).

Officer On-Call (OIC). The OIC will either approve or disapprove the request.

The Emergency Management department maintains checklists and other documents for requesting and responding to requests for mutual assistance.

The individual procedures, policies, and programs associated with this chapter are listed in the Appendix.

The appropriate level of leadership participates in and reviews the scheduling and findings of emergency preparedness activities. Emergency preparedness activities are conducted per the schedule published by Emergency Services.

B. GAS-FILLED OCCUPANCIES

In 2025, several natural gas explosions occurred in different parts of the country that resulted in severe injuries and fatalities. SDG&E assesses external incidents to identify lessons learned and opportunities to implement preventative safety improvements. A common issue identified in recent natural gas explosions was a lack of evacuations of occupied structures that were in close proximity to the leaking gas. These incidents reflect the importance of understanding gas migration resulting in serious risks associated with gas-filled occupancies, establishing an exclusion zone, evacuating the public, and the potentially deadly consequences to anyone who remains inside or in proximity.

For 2026, SDG&E is updating its existing Gas Standard G8202 (Field Guidelines - Emergency Incident Distribution/Customer Service), training and awareness of gas migration and, for those working near a known or suspected gas filled occupancy, to expand upon its evacuation criteria guidelines.

VI. STATE AND FEDERAL REGULATIONS

This section describes how SDG&E safely designs, constructs, installs, operates, and maintains gas transmission and distribution facilities in compliance with state and federal regulations and CPUC directives.[23]

1. REGULATORY OVERSIGHT

SDG&E's transmission and distribution pipelines and facilities are operated and maintained primarily pursuant to PHMSA regulations at the federal level, and Commission regulations and requirements at the state level. The Commission is a state partner of PHMSA and is certified by PHMSA for the intrastate regulatory, inspection, and enforcement responsibilities of the transportation of natural gas.

California's rules governing the design, construction, testing, operation, and maintenance of gas transmission and distribution piping systems are specified in the Commission's General Order 112-F, which incorporates 49 CFR Parts 191, 192, 193, and 199.

This Gas Safety Plan and related documents align with General Order 112-F and the applicable parts of Title 49 of the CFR. SDG&E's gas standards, including O&M procedures, are developed to maintain and improve safety, complying with federal and state regulations. The Pipeline Safety Assurance and Integrity Management & Strategic Planning teams monitor and track changes to legislation and regulations, coordinating the implementation of new requirements.

SDG&E stays current with regulations by monitoring legislative activities and participating in industry associations like the American Gas Association (AGA). The Company updates procedures, standards, and audit programs, maintaining required documentation to demonstrate compliance.
SDG&E will continue to comply with regulations, identifying, evaluating, and reducing system risk through continuous safety enhancements.

2. COMPLIANCE WITH GENERAL ORDER 112-F

In accordance with General Order 112-F and, by incorporation, 49 CFR Part 192, SDG&E has implemented and follows policies, procedures, and programs that govern the design, construction, testing, installation, operation, maintenance, and determination of maximum allowable operating pressure for gas transmission and distribution facilities. These policies, procedures, and programs are updated in a timely manner as appropriate in response to changes in regulation, safety advisories, and other safety information. SDG&E operates its pipelines and facilities in accordance with these requirements.

The individual policies, procedures and programs associated with this Section are listed in the Appendix.

These policies, procedures and programs have been developed to promote safety and comply with the code requirements and are summarized as follows:

2.1 Design: 49 CFR Part 192, Subparts B, C, and D specify the minimum requirements for the material selection and design of pipe and pipeline components. SDG&E's transmission and distribution pipelines and facilities are designed with approved materials that have sufficient

[23] Title 49 of the Code of Federal Regulations, California Public Utilities Code § 961, CPUC Decision 12-04-010.

wall thickness and/or adequate protection to withstand anticipated external pressures and loads that will be imposed on the pipe after installation. The pipelines and facilities are also designed with materials of sufficient strength to contain internal pressures plus appropriate design and/or safety factors. Components, including valves, flanges, and fittings meet the minimum prescribed requirements specified in the regulations. The design also includes pressure relief or other protective devices to prevent accidental over-pressurization as further described in the maintenance section. SDG&E implements defined procurement processes that facilitate materials traceability.

2.2 Construction: 49 CFR Part 192, Subparts E, F, G and J specify the minimum requirements for the construction and testing of transmission and distribution facilities, including the welding and joining of pipe and components as well as the protection of pipe and facilities from hazards such as unstable soil, landslides, and other hazards that may cause the pipe to move or sustain abnormal loads. SDG&E's transmission and distribution pipelines and facilities are to be constructed in accordance with these requirements.

2.3 Installation: 49 CFR Part 192, Subpart H specifies the minimum requirements for the installation of distribution service lines, service regulators, and customer meters. These requirements include specifications pertaining to the location of this infrastructure, protection from damage, and valve requirements. SDG&E's service lines, service regulators, and customer meters are to be installed in accordance with these requirements.

2.4 Maintenance: 49 CFR Part 192, Subparts M and I specify the minimum requirements for the maintenance of transmission and distribution pipe facilities along with the associated corrosion protection facilities. Maintenance activities include the patrolling of pipeline, performing leakage surveys, monitoring performance of corrosion protection systems, making repairs, inspection and testing of pressure limiting and regulating equipment, and valve and vault inspection and upkeep. SDG&E maintains its pipelines and facilities in accordance with these requirements.

2.5 Operations: 49 CFR Part 192, Subparts L and K specify the minimum requirements for the operation of transmission and distribution pipeline facilities. Operational activities are included in the O&M plan described in Chapter 4 and included the Emergency Response Plan described in Chapter 5 of this Gas Safety Plan. The operation of the pipeline also includes requirements for a public awareness program, damage prevention program, control room management procedures, odorization of gas, identification of changes in population density along certain transmission lines, and the determination of maximum allowable operating pressure, including requirements for increasing the maximum allowable operating pressure.

a. BEYOND STATE AND FEDERAL REGULATIONS

SDG&E stays current on emerging issues within the industry through active participation in industry associations to identify continuous improvement opportunities and enhance safety beyond current regulatory requirements.

Table 1 identifies a non-exhaustive list of industry groups in which SDG&E participates.

Table 1: List of Industry Participation

- American Gas Association
- Gas Piping Technology Committee
- Center for Hydrogen Safety
- American National Standards Institute
- The American Petroleum Institute
- American Society of Civil Engineers
- The American Society of Mechanical Engineers technical committees (B31Q, B31.3 B31.8, B31)
- California Accidental Release Prevention (CAL ARP) seismic committee
- California Regional Common Ground Alliance
- California Utilities Emergency Association
- Common Ground Alliance
- Dig Alert (Southern California one-call)
- GTI Energy (formerly, The Gas Technology Institute)
- Inter-Utility Coordination Committee
- Inter-Utility Working group
- The Association for Materials Protection and Performance
- NYSEARCH – National Gas RD&D
- USA North 811 (Northern California and Nevada one-call)
- Pipeline Association for Public Awareness
- Pipeline Research Council International
- Pipeline SMS
- The Western Energy Institute
- Construction Safety Research Alliance
- Western Gas Measurement Short Course

Figure 3 contains activities that SDG&E is in the process of implementing as a result of its participation in industry groups.

Figure 3 – Current Activities

Current Activities	
Industry Actions	**Implementation Status & Responsible Organization**
Residential Methane Detection (RMD) pilot program to use SDG&E's Advanced Meter communications system to provide alarming and other notification when measured methane-in air-concentration levels exceed pre-set acceptable limits at a monitoring site.	In Progress Gas Engineering/Customer Services

Research, Develop and Demonstrate technologies leveraging aircraft systems (manned and unmanned), to conduct various types of Pipeline/Facility inspections and/or surveys to improve safety in remote or difficult-to-access pipeline segments or as incremental activities.	On-going Research and Materials Strategic Programs
Mature material manufacturer assessments by enhancing the methodology and centralizing the process behind manufacturer selection to promote consistency, improve material traceability, and reduce risk.	In Progress Gas Engineering – Material Quality Management
Mature the TIMP Direct Examination process to produce results compatible with an Engineering Critical Analysis approach to defect assessment.	In Progress Integrity Management
Edison Electric Institute's (EEI) development of a Safety Classification and Learning (SCL) Model to track SIF Potential and promote learning and improvement.	On-going Safety

Figure 4 contains activities that SDG&E has implemented as a result of its participation in industry groups, including the American Gas Association (AGA) and others. Most of the activities are processes that have been initiated and implemented as a regular and routine element. Activities noted as "adopted," mean that the company has incorporated them as part of the normal course of business. The other activities are one-time events that were completed and are noted as "completed."

Figure 4 – Implemented Activities

Implemented Activities	
Industry Actions	**Implementation Status & Responsible Organization**
Develop technology to electronically track leak survey routes and map the location of found leaks with spatial coordinates and link other data such as level of leakage found.	Adopted Gas Operations - Policies Tools & Strategies
Implement a system that links geographic information systems (GIS) with locate and mark data from KorTerra (a ticket management software) to rank the highest risk Underground Service Alert (USA) tickets for prioritized outreach and engagement.	Adopted Gas Operations - Policies Tools & Strategies
Review and revise as necessary established construction procedures to provide for appropriate (risk-based) oversight of contractor installed pipeline facilities.	Adopted Gas Operations Services
Under the DIMP, evaluate risk associated with trenchless pipeline techniques and implement initiatives to mitigate risks.	Adopted Sewer Lateral Inspection Program Gas Operations Support

Implemented Activities	
Industry Actions	**Implementation Status & Responsible Organization**
Under the DIMP, identify distribution assets where increased leak surveys may be appropriate.	Adopted Integrity Management
Extend Operator Qualification program to include tasks related to new main and service line construction.	Adopted Pipeline Safety Assurance
Expand excess flow valve (EFV) installation beyond single family residential homes.	Adopted Integrity Management
Incorporate an Incident Command System (ICS) type of structure into emergency response protocols.	Adopted Emergency Services
Extend transmission integrity management principles outside of High Consequence Areas (HCAs) using a risk-based approach.	Adopted Integrity Management
Implement applicable portions of AGA's technical guidance documents: 1) Oversight of new construction tasks to ensure quality; 2) Ways to improve engagement between operators and excavators.	Adopted Gas Operations Services
Begin risk-based evaluation on the use of Automatic Shutoff Valves (ASVs), Remote Controlled Valves (RCVs) or equivalent technology on transmission block valves in HCAs.	Adopted Gas Engineering
Upgrades for aging equipment used to locate underground pipelines and facilities have been purchased and deployed. The standardized training has been developed and completed.	Adopted Gas Operations Services
Utilize algorithms in SDG&E's Advanced Meter program that detect subtle changes in consumption and leaks on the customer side of the meter. These algorithms also find water leaks from excessive natural gas consumption on water heaters.	Adopted Advanced Meter
Under dedicated construction oversight for the DIMP Distribution Risk Evaluation and Monitoring System (DREAMS) activities to ensure policy and procedural alignment, safety, and quality of work during construction of medium pressure main and service	Adopted DIMP DREAMS
Install Optical Pipeline Monitoring on all new or replacement pipelines one mile or more in length, at least 12 inches in diameter and intended to operate at or above 20 percent of their specified minimum yield strength. Will allow for remote monitoring of potential leaks in real time, identification of non-native ground movements and third party intrusions.	Adopted Gas Engineering
Utilize in-the-ditch Non-Destructive Examination methodology to determine pipe attributes by performing tests on the external surface of the pipe.	Adopted Integrity Management

Implemented Activities	
Industry Actions	**Implementation Status & Responsible Organization**
Implement Threat Identification process for identification and prioritization of pipe segments where Stress Corrosion Cracking (SCC) may be a threat.	Adopted Integrity Management & Strategic Planning
Computer program to evaluate surface loads on buried pipes was validated by PRCI field tests. Program is used to evaluate temporary and permanent loads on our buried pipes.	Adopted Gas Engineering
Computer program to evaluate lifting pipe along a trench to ensure the pipe is not being overstressed during installation.	Adopted (for special cases) Gas Engineering
Computer Program to evaluate piping stresses at river crossings.	Adopted Gas Engineering
811 Champion program empowers all employees with the knowledge and an efficient process to report potentially unsafe excavation practices.	Adopted Damage Prevention

VII. CONTINUING OPERATIONS

1. SAFETY IS A CORE VALUE

SDG&E considers the health and safety of all employees, contractors, and the public to be its core value. This core value is demonstrated through the following statements that describe our approach to safety at SDG&E:

- Individual health and safety and the safety of others is not compromised. Safe work habits are the responsibility of every employee and the foundation of job performance evaluations.

- Occupational injuries and illnesses can be prevented. Identification and reporting of workplace hazards and potential hazards are the responsibility of every employee of SDG&E. Job observations are implemented as part of our program to confirm that employees comply with safe and healthy work practices.

- Management takes an active role in implementing SDG&E's health and safety programs, as stated in our Injury Illness Prevention Program (IIPP), and stays aware of related workplace injuries, near misses, and at-risk behaviors.

- SDG&E performs formal investigations with root cause analysis and follows up on lessons learned for significant Company incidents and near misses. As part of its Incident Investigation, Evaluation, and Lessons Learned, SDG&E maintains a procedure for investigating incidents and near misses that led, or could have led, to an incident with serious consequences. These processes are incorporated into the Company's implementation of SMS, specifically the tenet on Incident Investigation, Evaluation, and Lessons Learned.

- Management is responsible for providing a safe workplace and creating a safety culture that promotes safe behaviors and safeguards to prevent accidents and injuries to employees, contractors, and the public. Employees work together to use equipment in accordance with job training and safety instructions.

- Safety culture is a key component in establishing a safe work environment. SDG&E has implemented a peer-to-peer Behavior Based Safety process, which encourages safe behaviors by performing field observations. The Gas Safety Sub-Committee creates opportunities as an open forum to address employee safety concerns to management. SDG&E periodically assesses its safety culture to confirm the effectiveness of its safety programs.[24] SDG&E seeks to engage all levels of employees through leadership listening sessions, town hall events, surveys and employee Key Performance Indicators to continually identify areas to improve our safety culture and performance.

- SDG&E complies with applicable federal, state, and local occupational health and safety regulations and implements these through training, company standards, our IIPP, and safety

[24] Per Commission Decision 25-01-031, SDG&E is scheduled to participate in the CPUC's Comprehensive Safety Culture Assessment in 2026.

lesson plans. Both pipeline and occupational safety are at the forefront of priorities for SDG&E. Safety is a component of employee training programs and performance appraisals.

2. SAFE AND RELIABLE TRANSPORTATION

SDG&E has designed its integrated gas transmission system to meet design standards established by the Commission for core and noncore customer service. The SDG&E gas system is designed to provide service to core customers during a 1-in-35-year peak day condition, under which noncore transportation service is curtailed. The system is also designed to provide continuous forecast noncore transportation service under a 1-in-10-year cold day condition. SDG&E utilizes detailed hydraulic models of the gas system to evaluate its capacity to meet these design standards and identify improvements as necessary. Both design standards are expected to occur during the winter operating season when core customers' gas usage is the greatest.

In accordance with Commission Decision D.02-11-073, SDG&E provides its system capacity twice per year to the Commission's Energy Division (the most recent filing may be referenced to obtain SDG&E's capacity to serve customer demand during both the winter and summer operating seasons). SDG&E does not have any physical natural gas storage wells in its system. Pursuant to Commission Decision D.07-12-019, SoCalGas handles gas procurement for SDG&E's bundled core customers through a combined SoCalGas/SDG&E core procurement portfolio.

Information about transportation capacity is available through the ENVOY electronic bulletin board. The link to the ENVOY bulletin board is located at: socalgas-envoy.com

In accordance with SDG&E's policies, the Gas Transmission Planning and Region Engineering departments continuously monitor customer demand on SDG&E's transmission and distribution system, using both actual customer service requests and our long-term demand forecast. Any changes in customer demand are evaluated against the appropriate CPUC-mandated design standards for service to ensure adequate capacity is available. Depending on the customer class, SDG&E has a variety of Commission-approved means to address any capacity deficiencies. When a deficiency is identified, possible solutions are considered, evaluated, and implemented according to SDG&E gas rules and tariffs. For example, a facility improvement that is required to serve a single noncore customer and which provides no benefit to other customers is funded entirely by that customer.

Finally, the SDG&E gas system is continuously monitored to meet current customer demand. As part of the integrated gas transmission system with SoCalGas, the integrity of the SDG&E system falls under the responsibility of the Utility System Operator. Per SoCalGas Rule 41, Utility System Operation, the mission of the Utility Gas System Operator is to maintain system reliability and integrity. This rule provides information on the responsibilities performed to maintain system reliability by each of the SoCalGas departments that contribute to the System Operator function.

SDG&E will continue to perform operating and maintenance activities and make capital investments to support the company's pipeline system and comply with all applicable regulations.

a. Leak Detection and Repair

SDG&E pipelines are routinely surveyed for leaks at intervals of three months, one year, or five years, as

determined by the pipe material involved (i.e., plastic or steel), the operating pressure, whether steel segments have sufficient cathodic protection, and the proximity of the pipe to various population densities. In addition to routine leak surveys, SDG&E performs special leak surveys, as needed, and on more frequent cycles than those discussed above (*e.g.*, two or three months). Special leak surveys occur at various times, including ahead of street improvements to address pending leaks prior to street moratoriums; after the occurrence of any significant incident (*e.g.*, explosion, earthquake, flooding, landslides, etc.) adjacent to high-pressure pipelines or related facilities; when increasing the maximum allowable operating pressure of a pipeline; when routine survey requirements are not considered adequate because of pipe condition or limited opportunity for gas to vent safely; or when there is a need to monitor pipe condition for special situations, such as material evaluations. Additionally, required surveillance and special leak surveys are also conducted on pipeline spans, pipelines through/on bridges, areas of unstable earth (*e.g.*, landslide, erosion) or conditions that indicate increased risk.

SDG&E's maintenance crews investigate leak indications and make repairs, as needed. Completing leak repairs generally requires excavating in paved streets and landscaped areas to determine the exact location of the leak. This work often involves pavement cutting, trenching, and then repair of pipe facilities, followed by backfilling the excavation, compacting the soil, and making permanent repairs to pavement and landscaping as needed. Main leak evaluation and repair work is generally completed to mitigate risks associated with hazards to public safety, and to address infrastructure condition, and material degradation.

3. SDG&E WORKFORCE SIZE, TRAINING AND QUALIFICATIONS

a. Workforce Size

SDG&E determines appropriate staffing levels by taking into consideration multiple factors to preserve the safety, reliability, and integrity of its pipeline system, in accordance with California Public Utilities Code section 961. SDG&E engages in workforce planning, knowledge transfer, training, and succession planning to address current and anticipated resource needs.

Annual baseline employee staffing levels are determined during the annual planning process and contracts are maintained with qualified service providers to complete work and address variability in work demand throughout the year. As part of the planning process, management reviews its projected workforce to adequately fulfill safety, compliance, maintenance, and construction obligations. If local management cannot fulfill these obligations, they raise the need as part of the resource allocation and funding process. During the year, as resource vacancies occur or as work levels significantly change, local management reassesses the need for the workforce and submits a request to fill the vacancies or add to staff. Resource allocation decisions consider employee levels and contractor availability.

Verification of appropriate staffing levels is determined by monitoring specified performance metrics and workloads. These performance metrics include: meeting emergency response goals (*e.g.*, Priority 1 response within 30 minutes) and compliance with distribution pipeline leakage code response times consistent with Company policy. The performance metrics are collected monthly and are reviewed by SDG&E's Board Safety Committee and Senior Management. If SDG&E falls below performance goals, a review and assessment is performed and appropriate resource adjustments are made, if determined necessary.

Employees in safety-sensitive positions are trained and qualified to handle emergencies. Employees are cross-trained as needed in various assignments to perform a variety of duties that allow a flexible workforce to meet sudden changes in work demands. The company assesses its workforce requirements on an ongoing basis (such as an annual planning exercise) to develop hiring and development plans and budgets to supplement or replenish the workforce as necessary to sustain the safety, reliability, and integrity of the pipeline system.

The Company uses contractors, as necessary and in compliance with collective bargaining agreements, so that sufficient overall resources are deployed to address maintenance and construction. SDG&E continues to require that contractors undergo training and meet specific compliance requirements to perform work on company pipelines and facilities. Contractors are monitored to ensure that they perform their responsibilities consistent with company standards and contract requirements.

b. Gas Operations Training

Safety is rooted in all phases of training provided by SDG&E's Gas Operations Training. It starts with the formalized training that employees receive when they begin their career, emphasized on the job, and then re-emphasized during training they receive as they advance to new jobs.

Training courses are delivered to each function/classification in all field job-progressions and vary from two to seven weeks for entry-level positions. Courses are taught utilizing various training methods and are foundationally rooted in SDG&E's Gas Standards and procedures. The courses are delivered by a centralized Gas Operations Training team with most of the instructors having gained practical experience on the job. These instructors convey consistent safety messages and confirm understanding of the classroom training by observing employees perform in simulated field situations.

Integrated in the training courses are the Operator Qualification tasks, as required by 49 CFR Part 192 regulations. The documentation for these qualifications and records are closely monitored and employees are re-trained, re-qualified, or updated whenever significant changes occur in a task regulation or when they are required to re-qualify as prescribed by PHMSA.

Emergency response is covered within the training courses for classifications that have any activities or functions in this area. The classifications include Working Foreman, Welder, Gas Technician B, Gas Technician A, Service Technician, Meter Service Person, Locator, Laborer, Regulator Technician, Instrument Technician, Cathodic Protection Technician, and Gas Patroller. After initial training is conducted by Gas Operations Training, employees are required to annually review policies and procedures so that they understand emergency response guidelines and procedures, including when to contact Corporate Security to address certain threats.

SDG&E has a training curriculum that tests employees' skills in identifying and repairing gas leaks and other real-life emergency situations through simulation exercises. In addition to training programs provided by Gas Operations Training, SDG&E implemented a technical skills training class to help employees new to management become more effective in addressing these situations as supervisors and managers.

As part of the Company's continuing education effort, supervisors and managers are trained by SDG&E's Emergency Management team on the application of a flexible, scalable, sustainable, and

measurable scene management process that is ICS compatible in response to emergency incidents.

SDG&E participates in industry forums, validates that training activities are consistent with regulatory requirements, and identifies when new training opportunities exist.

Training course materials are updated on a regular basis. Root causes of safety incidents and findings of near miss investigations are a significant part of course discussion/instruction to sustain and improve overall employee and system safety.

c. Qualification of Pipeline Personnel

Gas pipeline operators are required to have a written Operator Qualification program to establish compliance policies for the DOT Operator Qualification Program as required by 49 Code of Federal Regulations, Subpart N – Qualification of Pipeline Personnel, to qualify employees and contractors performing DOT-covered tasks. The Company's Operator Qualification Program applies to all individuals who perform covered tasks, whether they are employed by the Company, a contractor, a sub-contractor, or any other entity performing covered tasks on behalf of the Company.

The Operator Qualification Program requires that employees are trained, initially qualified, and subsequently re-qualified depending on the task. SDG&E's training frequency conforms to these requirements and the results of the evaluations are recorded -- demonstrating employees' knowledge, skills, and abilities of the job requirements and that they are qualified to perform the required tasks. If employees don't pass, they are not allowed to perform that activity until they have been successfully re-trained and re-qualified. Essentially, any employee who performs a covered task - ranging from customer services field to distribution and transmission personnel - needs to be qualified to perform Operator Qualification tasks.

The Operator Qualification Program also requires that contractors' knowledge, training, and skills conform to the job requirements and that they are qualified to perform the
required tasks.

Veriforce is a third-party vendor that offers comprehensive solutions for Operator Qualification (OQ), Drug & Alcohol (D&A), Training, Auditing, and Consulting programs to Operators and contractors nationwide. Beginning in 2012, SDG&E has partnered with Veriforce to manage all gas contractors' OQ and D&A programs using the Veriforce electronic database. The Veriforce partnership allows SDG&E to improve the overall OQ program for gas contractors by requiring them to abide by a common OQ program and tracks their D&A status to maintain compliance. Some key features of using the Veriforce system are: the ability for contractors to have proof of qualifications on the job site; the ability to track qualification failures; and visibility to the D&A status of each contractor company and its employees.

4. ANTI-DRUG AND ALCOHOL MISUSE PREVENTION PLAN

The purpose of SDG&E's Anti-Drug and Alcohol Misuse Prevention Plan is to prevent incidents that could result from the use of controlled substances and alcohol, thereby reducing fatalities, injuries, and property damage. SDG&E's plan and policies are designed to comply with applicable state and federal

laws.[25]

Operators of pipeline facilities subject to 49 CFR Parts 192, 193, and/or 195 are required to test covered employees for the presence of prohibited drugs and alcohol. If performing DOT-covered functions, employees undergo pre-employment drug testing and are entered into the Company's random drug testing program. Contractors must also have anti-Drug and Alcohol Misuse Prevention plans and procedures. Contractors may utilize consortiums or Third-Party Administrators to provide services to remain in compliance with DOT regulations. Contractors must ensure their employees have a negative pre-employment test on file before their first performance of safety-sensitive functions and are entered in their (contractor's) random testing pool.

5. PHYSICAL SECURITY

Sempra's physical security program is designed to protect the safety of SDG&E's employees and infrastructure. As a result of continued security threats and the evolving sophistication of adversary attacks, the physical security program is regularly assessed to validate strategic direction and improve alignment with current industry best practices. As a key partner, Corporate Security works collaboratively with SDG&E to mitigate potential physical threats and maintain a safe work environment. Corporate Security supports SDG&E's mission by assisting in the management of physical security risks, enabling risk informed decisions, and proactively adapting to evolving threats and changing business needs.

Corporate Security is responsible for the development and management of physical security programs and policies, including physical security controls, security assessments, investigations, and workplace violence mitigation. Key responsibilities include:

- Investigations
- Access Management
- Employee Safety Protection
- Regulatory Compliance
- Emergency Response
- Facility Monitoring
- Contract Guard Services
- Security Training
- Security Reviews & Vulnerability Assessments
- Risk & Intelligence Analysis
- Law Enforcement Liaison

Assessments and improvements occur through participation in security events, including detailed discussions and site-specific tabletop exercises, GridEx,[26] the American Gas Association (AGA), and the US

[25] 49 CFR Part 40, 49 CFR Part 199, 49 CFR Part 382.
[26] GridEx is a national exercise that simulates cyber and physical attacks on the North American electricity grid.

Department of Homeland Security (DHS) Transportation Security Administration (TSA). Under closely supervised conditions, these discussions and simulations identify opportunities for improvement that have been prioritized for remediation as part of a continuous improvement strategy for risk mitigation.

6. CYBERSECURITY

The Sempra California Cybersecurity Department oversees the management of cybersecurity risks for both Information Technology (IT) and Operational Technology (OT).

The services provided by the Cybersecurity Department focus on maintaining and improving the company's security posture amid increasing cybersecurity threats. Cybersecurity supports technology innovations and enhancements within the business by reducing the likelihood and potential impact of cybersecurity incidents across all business areas within SoCalGas, SDG&E, and the Corporate Center[27] while balancing costs and applying prioritized risk management. Additionally, the department supports enterprise cybersecurity capabilities such as delivering cybersecurity training and awareness to all users to enable them to perform their functions safely, reliably, and securely.

The Cybersecurity program includes the following functional areas: Cybersecurity Strategy, Portfolio and Governance; Cybersecurity Architecture and Engineering; Cybersecurity Governance and Risk Management; Cybersecurity Operations and Compliance; Cybersecurity Threat Detection and Response; and Enterprise Identity Services.

The Cybersecurity program utilizes cybersecurity and risk management frameworks, including but not limited to the NIST Cybersecurity Framework (CSF), Center for Internet Security (CIS Controls), NIST SP 800-53, and MITRE ATT&CK framework. Additionally, the companies comply with applicable laws and regulations at both the state and federal levels.

7. ENTERPRISE RISK MANAGEMENT

SDG&E is committed to taking a risk-informed decision-making approach to prioritizing work and allocating resources. SDG&E has a comprehensive, rigorous, and iterative system to manage its business risks across the enterprise, which encompasses employee, contractor, customer, public, and infrastructure safety risks. SDG&E has a dedicated organization, Enterprise Risk Management (ERM), whose role is to facilitate the identification, analysis, evaluation, and prioritization of risks. Effective risk management practices help to reinforce a strong and positive safety culture. SDG&E has undertaken a thoughtful and measured approach to the adoption of risk management structures and processes at all levels, to further the development of a risk-aware culture.

SDG&E's ERM team has the responsibility for developing risk frameworks to identify, analyze, and evaluate emerging risks, facilitating the annual refresh of the Enterprise Risk Registry (ERR), and working with individual operating groups in development of an accompanying Operating Unit Risk Registry

[27] While this Gas Safety Plan is focused on SDG&E, the cybersecurity organization, personnel, and technologies that support SDG&E are shared across Sempra California, including SoCalGas and Corporate Center. This standardized approach provides for consistent application of industry standards and helps reduce cyber risk across all Sempra California companies.

(OURR). The OURRs are a bottom-up approach to analyzing risk that complements the ERR, which is top-down. Together, the two methods allow SDG&E to link risk assessments with risk treatment decisions, which leads to risk-informed investment prioritization. ERM continues to educate and grow the risk culture by conducting risk workshops and risk webinars with various operating groups. Additionally, ERM performs ad-hoc risk analyses of emerging risks and leads both formal and informal risk-related meetings to support risk owners and managers. These responsibilities work cohesively to promote risk-informed thinking in each department across the Company, while strengthening the overall risk management process.

The purpose of risk management is to systematically reduce the likelihood and consequence of safety risks, protecting the public, employees, contractors, and critical gas infrastructure. Proactive, collaborative and effective risk management improves performance, encourages innovation, and supports Company goals and objectives. SDG&E's risk management practices not only reinforce a strong and positive safety culture but are also integral to its approach to adopting risk management structures and processes at all levels. This commitment fosters the development of a risk-aware culture, as the ERM practices and processes are actively utilized by various operational and functional departments to identify safety risks, thereby serving as a critical component of SDG&E's Safety Management System.

VIII. EMERGING ISSUES

1. EMERGING ISSUES AND CALIFORNIA PUBLIC UTILITIES CODE § 961(d)(11)

In D.12-04-010, the Commission identified the topic of emerging issues to meet the requirements of Public Utilities section 961(d)(11). This section requires that the gas safety plan includes any additional matter that the commission determines should be included in the plan.

2. SDG&E MONITORING OF EMERGING ISSUES

SDG&E stays current on emerging issues within the industry through active participation in industry associations, review of PHMSA advisory bulletins, and open communication with peer utilities, legislative, and regulatory groups as well as news and trade publications.

SDG&E's ERM organization facilitates a quarterly Directors Risk & Compliance Council meeting, comprised of SDG&E's Director of Safety and other operational leaders. Key objectives of this Council include (1) discussing current and/or emerging risks influencing utility operations, (2) promoting transparency through effective dialogue across the organization to deeply integrate risk culture, and (3) discussing development of risk frameworks including regulatory proceedings, key risk indicators, industry trends, and others.

SDG&E is continuing to address the emerging issues of the grandfathering of provisions in Title 49 of the Code of Federal Regulation (49 CFR) Part 192 as discussed in Chapter 4 of this Gas Safety Plan, along with the newly implemented requirements for MAOP reconfirmation, repair criteria, Integrity Management improvements, cathodic protection, management of change, and rupture mitigation, under the Gas Transmission Safety Rule.

3. COLLABORATION WITH THE CALIFORNIA PUBLIC UTILITIES COMMISSION

SDG&E continues to work in collaboration with the Commission and other regulatory authorities and stay abreast of industry expectations, to address those emerging issues that are not yet covered by this Gas Safety Plan.

a. Safety Culture Order Instituting Rulemaking, R.21-10-001

In October 2021, the CPUC issued Order Instituting Rulemaking (OIR) 21-10-001 to develop and adopt a safety culture assessment framework and identify the structure, elements, and process necessary to drive each regulated investor-owned electric and natural gas utilities and gas storage operators to establish and continuously improve their organization-wide safety culture. In January 2025, the CPUC approved the *Decision Adopting a Safety Culture Framework for the Large Investor-Owned Utilities*.[28] This Decision adopts a normative framework adapted from the United States Nuclear Regulatory Commission's Safety Culture Common Language and the Institute of Nuclear Power Operations' Ten Traits of a Healthy Nuclear Safety

[28] D.25-01-031, issued January 23, 2025.

Culture to serve as the basis of the CPUC's Safety Culture Assessment framework. Per the schedule adopted in the Decision, SDG&E will undergo a comprehensive safety culture assessment in 2026. SDG&E appreciates the ongoing collaboration with the CPUC, Safety Policy Division, the Joint IOUs and interested parties in addressing this important issue that could have a significant impact on utilities and operators in the state and looks forward to participating in the Utility Safety Culture Working Group, as directed by the Decision.

Per the schedule adopted in D.25-01-031, SDG&E will participate in its CPUC Comprehensive Safety Culture Assessment in 2026. SDG&E will monitor Phase 2 (small multi-jurisdiction utilities and the independent gas storage operators) of the Rulemaking for any potential items that will impact the large IOUs assessments or the framework established by the CPUC.

b. Senate Bill 1371 "Natural Gas Leakage Abatement"

Senate Bill (SB) 1371 requires the adoption of rules and procedures to reduce methane emissions from Commission-regulated natural gas pipeline facilities consistent with Public Utilities Code section 961(d) and 49 CFR sections 192.703(c). SDG&E maintains an approved Leak Abatement Compliance Program to meet these requirements. While the execution of new programmatic projects is not authorized, the program continues in limited form through base business activities that support ongoing compliance, emissions monitoring, and reporting.

SDG&E continues to implement limited SB 1371 requirements by integrating leak abatement and emissions management practices into routine operations, maintenance, and safety activities. These efforts leverage existing systems, tools, and operational practices and are conducted in a manner consistent with Commission authorization and cost-effectiveness considerations.

Ongoing base business activities supporting methane emissions management include but are not limited to:

- Improving the accuracy of emissions estimations and reporting;
- Find-It, Fix-It leak repair on distribution main and service lines;
- Surveying all main and service lines for leaks at least once every five years and surveying vintage plastic mains and services annually;
- Executing a damage prevention program to mitigate against 3rd party excavation damages;
- Capturing natural gas released during pipeline replacement or safety maintenance and testing, allowing for gas to be saved for later use while eliminating emissions that would otherwise occur.; and
- Leveraging electronic leak survey software that enhances safety by precisely pinpointing leak locations and providing geospatial "breadcrumbing", enabling faster confirmation, accurate dispatch of field crews, and reduced exposure time for the public and employees while improving operational efficiency.

c. Risk Management, Safety Model Assessment Proceeding, R.20-07-013

In addition to the efforts described in section VIII.2 above, SDG&E continues to work with the CPUC to develop and enhance its processes to assess and manage risk. Implementation of SMS for its pipeline operations is a key step towards enhanced asset and risk-based decision-making to ultimately improve

safety performance. As such, SDG&E established an enterprise-wide SMS framework in 2020, as further described above. SDG&E is an active participant in ongoing CPUC proceedings related to risk management, including the Safety Model Assessment Proceeding (S-MAP). A key directive of the S-MAP is the Risk-Based Decision-Making Framework (RDF), which generally outlines the technical requirements of the Company's RAMP filing. For each enterprise risk, the RDF requires the utility to compute a monetized Safety Risk Value. The top 40% of ERR risks with a Safety Risk Value greater than zero dollars form the preliminary risks to be assessed in RAMP, subject to ERM's proposed modifications. SDG&E's ERM organization works annually to refresh risk registries at the enterprise level. Additionally, SDG&E leverages the Operating Unit Risk Registry to inform internal asset management strategies and integrity management to continue the integration of risk and asset management.

d. Climate Change Adaptation

Utilities have long prioritized resilience in infrastructure investments to ensure safety and reliability. However, the accelerating impacts of climate change and the increasing frequency of extreme weather events present a new and growing threat to utility systems, operations, and services. As a result, utility planning must evolve to incorporate forward-looking climate considerations and proactively address these emerging challenges.

SDG&E is continuing to further the process of integrating climate change adaptation into utility planning processes in alignment with Commission direction.[29] Some significant examples include SDG&E's Risk Assessment Mitigation Phase (RAMP) Application and Climate Adaptation Vulnerability Assessment (CAVA), filed concurrently in May 2025.[30] Additionally, SDG&E has and continues to perform robust engagement with Disadvantaged and Vulnerable Communities (DVCs)[31] to empower and support these communities and the utility in building resilience.

Effective climate adaptation requires the identification and evaluation of actions that can be taken to address vulnerabilities associated with climate change impacts. SDG&E's CAVA addresses the requirements of the Climate Adaptation OIR and industry best practices for assessing physical climate risks. The methodology uses forward-looking climate science information applied to the electric and gas system, and relies on a combination of climate exposure, infrastructure sensitivity, and adaptative capacity scores to derive vulnerability of assets to climate impacts. The results of CAVA serve primarily to identify higher vulnerability assets and identify adaptation options that may be considered. SDG&E will continue to explore ways to integrate climate exposure data and vulnerability

[29] *See* R.18-04-019. Order Instituting Rulemaking (OIR) to Consider Strategies and Guidance for Climate Change Adaptation; R.20-07-013, Risk-Based Decision-Making Framework; R.24-09-012. Long-Term Gas Planning.
[30] D.24-08-005 modified the timing to require IOU filing of the CAVA one year prior to filing the RAMP. See D.24-08-005 at page 81.
[31] As defined by D.20-08-046, a DVC consists of: "The 25% highest scoring census tracts according to the California Communities Environmental Health Screening Tool (CalEnviroScreen); all California tribal lands; census tracts with median household incomes less than 60% of state median income; and census tracts that score in the highest 5% of Pollution Burden within CalEnviroScreen but do not receive an overall CalEnviroScreen score due to unreliable public health and socioeconomic data."

analysis into its quantitative risk models and across climate-relevant proceedings.[32]

e. Pipeline and Hazardous Material Safety Administration (PHMSA) Regulations

As significant and new federal safety regulations develop, SDG&E continues to provide input to assist in effective implementation and desired outcomes that affirms SDG&E's commitment to safety. In conjunction with new PHMSA regulations, SDG&E has been authorized to establish the Gas Safety Enhancement Programs Memorandum Balancing Account (GSEPMA) to record incremental, substantial, and non-speculative costs imposed by PHMSA's amendments to the CFR.[33]

These new regulations are focused on improving pipeline safety and integrity throughout the country and are primarily driven by the "Protecting our Infrastructure of Pipelines Enhancing Safety" (PIPES) Act of 2020, which is in the process of reauthorization. The PIPES Act includes several significant enhancements intended to advance PHMSA's programs addressing public safety and the environment. Some of these enhancements include:

- Updates to PHMSA's leak detection and repair and class location change regulations to enhance public safety while minimizing methane emissions
- Increased funding to federal and state pipeline safety regulatory agencies and new PHMSA workforce development requirements
- Requirements for operator updates to DIMP plans, emergency response plans, and O&M plans to address over-pressurization and respond to incidents
- Modernized safety regulations covering LNG export facilities and authorization for a new National Center of Excellence for LNG Safety
- Strengthened safety regulations covering local gas distribution systems
- Initiation of a leak detection and repair program requirement
- New grant funding for emergency responders, public safety advocates, and community groups
- New regulations for idled natural or other gas transmission and hazardous liquid pipelines

Drafts of the bill that will reauthorize the PIPES Act[34] indicate that Congress will also prioritize the following enhancements:

- Update safety rules for above-ground storage tanks that are currently in use
- Enhance operators' ability to test new technologies in real world situations
- Guard against risks associated with pipelines constructed of composite materials
- Strengthen state "call-before-you-dig" programs
- Address the safety of CO2 and hydrogen pipelines.

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[32] SPD's RAMP Report recommends that: "1. Quantification of climate risk was not required in these filings, but SDG&E and SoCalGas should continue to work toward incorporating quantified climate risk elements in future RAMP filings. 2. SDG&E and SoCalGas should include in future climate change adaptation RAMP chapters a list of the assets that were included in their respective CAVA but omitted from RAMP risk chapters due to RDF prioritization criteria." RAMP Report at page 188.

[33] D.24-12-074, Ordering Paragraph 10(e).

[34] H.R.5301 - PIPES Act of 2025 (Introduced 09/11/2025) https://www.congress.gov/bill/119th-congress/house-bill/5301?q=%7B%22search%22%3A%22PIPES+act%22%7D&s=2&r=1

- Make cybersecurity requirements permanent in order to prevent attacks like the Colonial Pipeline hack in 2021
- Address aging plastic components known to fail and land movement caused by landslides and earthquakes
- Mitigation of Geological hazards through evaluation reports and potential subsequent regulation for identified threats
- Recommendations on Maximum Allowable Operating Pressure record requirements for reconfirmation
- Review and update methodology for Potential Impact Radius calculations

Examples of new and upcoming rulemakings include:

"Pipeline Safety: Class Location Change" Rulemaking	PHMSA anticipates publishing the "Pipeline Safety: Class Location Change" final rule to add an alternative set of requirements operators may use when implementing integrity management principles where the class location of a pipeline segment has changed from a Class 1 location to a Class 3 location. • Operators would be required to notify PHMSA if they use integrity management activities to manage pipeline segments that have changed from a Class 1 to a Class 3 location. • The alternative set of requirements would apply only to those pipeline segments that have changed class location following the effective date of the rulemaking. • A Class 1 to Class 3 location segment would be defined as a High Consequence Area segment and subject to 49 CFR Part 192, Subpart O.
"Carbon Dioxide and Hazardous Liquid Pipelines" Rulemaking	PHMSA issued a pre-publication of the NPRM on January 17, 2025, addressing regulations for the transportation of carbon dioxide pipeline in a gaseous state. However, the NPRM was promptly withdrawn as a result of the Regulatory Freeze Pending Review executive order.[35] During this rulemaking, PHMSA will consider whether applying the minimum safety standards of 49 C.F.R, Part 195, which apply to the transportation of carbon dioxide in the liquid state, will ensure safety.
"Geohazard and Aging Infrastructure Mitigation" Rulemaking	PHMSA issued an Advisory Bulletin reminding operators of gas and hazardous liquid pipelines of risks posed by earth movement and geological hazards. The bulletin emphasizes monitoring terrain stability, climate-related changes, and implementing preventive measures under 49 CFR 192.935 and 195.452. Operators are urged to conduct geohazard risk assessments, design pipelines to withstand external loads, and develop site-specific mitigation plans. These actions aim to prevent failures caused by landslides, subsidence, flooding, and earthquakes. The PIPES Act 2025 is looking to enforce addressing risks from land movement (e.g., landslides, earthquakes) and replace aging plastic components known to fail. Includes enhanced monitoring and emergency preparedness measures.

[35] 90 FR 8249.

"LNG Facility Safety" Rulemaking	The "Pipeline Safety: Amendments to Liquefied Natural Gas Facilities" Advance Notice of Proposed Rulemaking (ANPRM) was published by PHMSA on May 5, 2025. This ANPRM seeks input on revising LNG facility safety regulations under 49 CFR Part 193, which have not been substantially updated since 2004. Proposed changes include modernizing siting, design, and operational requirements, incorporating NFPA 59A (2023), and introducing risk-based frameworks for large-scale LNG export facilities. These updates respond to growth in U.S. LNG exports and evolving applications such as small-scale LNG. Comments were due July 7, 2025, and PHMSA held a public meeting on October 22, 2025 to inform a forthcoming NPRM.
"Cybersecurity Requirements" Rulemaking	PHMSA, in coordination with TSA, is moving to make cybersecurity requirements permanent for pipeline operators. While no NPRM has been published yet, the PIPES Act of 2025 directs TSA to codify standards introduced after the Colonial Pipeline incident. Operators will need to implement robust cybersecurity programs, conduct vulnerability assessments, and comply with reporting protocols to protect against malicious cyber campaigns.
"Excavation Damage Prevention" Rulemaking	PHMSA enforces excavation damage prevention requirements under 49 CFR Part 196. The existing rule establishes minimum standards for excavators, mandates participation in one-call systems, and outlines enforcement processes for states with inadequate programs. The PIPES Act 2025 is expected to strengthen these requirements by adopting Common Ground Alliance best practices, increasing penalties, and enhancing federal oversight where state enforcement is lacking.
"Testing New Technologies" Rulemaking	The Pipes Act of 2025 authorizes PHMSA to enhance operators' ability to test innovative technologies in real-world conditions by streamlining special permit processes and incorporating updated industry standards. PHMSA's Periodic Standards Update II Final Rule (Aug 21, 2025) incorporated 19 new technical standards to encourage innovation and reduce compliance burdens.
"Composite Materials" Rulemaking	Section 214 of the PIPES Act of 2025 requires PHMSA to study risks associated with pipelines constructed of composite materials and report findings to Congress. This study will inform future rulemaking to address design, integrity management, and failure modes unique to composite pipelines.

Examples of additional rulemakings under consideration include:

"Leak Detection and Repair" Rulemaking	The "Pipeline Safety: Gas Pipeline Leak Detection and Repair" Notice of Proposed Rule Making (NPRM) was issued by PHMSA on May 5, 2023. In response to the PIPES Act of 2020 and in support of the Biden-Harris Administration's U.S. Methane Emissions Reduction Action Plan, the proposed regulatory amendments in the Gas Pipeline Leak Detection and Repair Rule are intended to reduce both intentional and unintentional greenhouse gas emissions. Operators must develop an advanced leak detection program (ALDP) with a list of leak detection technologies and practices re-evaluated on a periodic basis. This includes leak grading and

	repair criteria, increased leakage survey and patrolling frequency, failure investigation requirements, and design, configuration, and maintenance requirements to eliminate leaks and minimize releases of gas. Additional regulatory revisions emphasize public safety and environmental safety from all hazards. PHMSA submitted a pre-publication of the final rule on January 17th 2025, but promptly withdrew the rule as a result of the Regulatory Freeze Pending Review executive order.[36] SoCalGas continues to monitor activity related to this rulemaking.
"Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives" Rulemaking	The "Pipeline Safety: Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives" NPRM was issued by PHMSA on August 24, 2023. PHMSA is proposing regulatory amendments that will require operators of gas distribution pipelines to update their DIMP; emergency response plans; operations and maintenance manuals, including the expansion of MOC to the distribution system and associated activities, as well as the introduction of traceable, verifiable, and complete record-keeping for distribution pipeline systems; and other safety practices. These proposals implement provisions of the Leonel Rondon Pipeline Safety Act - part of the PIPES Act of 2020—and a National Transportation Safety Board (NTSB) recommendation directed toward preventing catastrophic incidents resulting from over-pressurization of low-pressure gas distribution systems similar to that which occurred on a gas distribution pipeline system in Merrimack Valley on September 13, 2018. The rule would take effect 12 months after publication.
"Pipeline Operational Status" Rulemaking	PHMSA will issue an NPRM addressing risk-based regulations for idled pipes including requirements for allowing idled pipelines to resume operations.

f. Joint Application to Establish Hydrogen Blending Demonstration Projects, A.22-09-006

On March 1, 2024, SDG&E, SoCalGas, Pacific Gas and Electric Company, and Southwest Gas Corporation (the four gas CA IOUs) filed an amended application which proposed hydrogen blending demonstrations from 5-20% hydrogen by volume in (1) isolated polyethylene plastic distribution pipeline systems, and (2) isolated mixed material (steel and plastic) distribution systems within their respective territories. The proposed hydrogen blending demonstration projects, if approved, will generate crucial information and knowledge with the goal of informing the development of a safe hydrogen injection standard for the state. The amended application also included (1) a hydrogen blending demonstration project from 0.1% to 5% hydrogen by volume in a simulated open portion of the SoCalGas's distribution system, and (2) a hydrogen blending demonstration from 5-20% in a transmission system test loop in PG&E's service territory. In addition to the development of the hydrogen injection standard, SDG&E will review and update relevant standards, procedures and specifications for operational readiness in preparation for the demonstration projects, and for safe introduction of hydrogen blending in its system.

SDG&E's safety efforts for its hydrogen blending demonstration projects involve initiating, implementing, and completing protocols such as providing hydrogen safety education for personnel directly or indirectly

[36] 90 FR 8249

associated with the projects and developing any necessary emergency response plans. Furthermore, safety assessments are conducted along with testing, leak surveys and methane/hydrogen monitoring. Mitigation measures are also incorporated throughout the process and are very effective in safe-guarding hydrogen-blending projects.

Safety is at the core of this Application. The project is integrated within SDG&E's Safety Management System and utilizes the American Petroleum Institute's (API) 1173 Plan-Do-Check-Act model.[37] SDG&E is currently in the "Plan" stage. The project will move into the "Do" stage by initiating the controlled blending project that the Plan stage has informed. Leading up to and during the "Do" stage, SDG&E will establish project management plans and procedures, train staff on hydrogen blends and project equipment, document, and record data from the demonstration, and engage with stakeholders, including the communities and end users. The project leads into the "Check" phase, where SDG&E will learn from the data collected, including utilizing the data for an integrity/risk management analysis. Should these pilots lead to a hydrogen injection standard, the "Act" phase would follow. In collaboration with the Commission and the Joint Utilities, SDG&E would translate the knowledge gained from the Joint IOU projects and other relevant studies into safety policies and operating procedures that would allow for safe hydrogen blending in the common natural gas system. Plan-Do-Check-Act is a continuous learning framework that SDG&E will follow for all hydrogen blending activities.

SDG&E's safety efforts to be taken before, during, and after the project include, but are not limited to:

- Hydrogen Safety Training for SDG&E personnel, relevant USCD personnel, and relevant first responders;
- Safety Assessment for hydrogen storage;
- Conduct pre-, during, and post-implementation leak surveys;
- Create hydrogen blending specific customer protocols and emergency response plans;
- Test existing and new leak survey equipment;
- Test emissions from the fuel cell flue system; and
- Conduct equipment inspections during commissioning, testing, and prior to decommissioning.

The hydrogen system will include continuous remote monitoring that will notify SDG&E of leakage events. Safety protocols and remote controls will stop hydrogen production and automatically shut down Project operations should leakage be detected above a defined level.

g. Long-term Gas Planning OIR, R.24-09-012 and Senate Bill 1221 Implementation

The Commission issued the current Long Term Gas Planning OIR (R.24-09-012), as a successor to R.20-01-007, to continue its efforts to address California's long term gas planning process in order to achieve California's decarbonization goals and effectuate an equitable gas transition. To do so, a coordinated, iterative, and long-term gas planning process is needed to help the State Agencies and utilities align initiatives related to gas system planning efforts and analytics. The current gas proceeding seeks to continue the work started in the previous Gas OIR and the associated white paper co-authored by the Commission, the California Energy Commission, and the California Air Resources board. Thoughtful planning of the transition away from fossil gas will help achieve California's climate goals while also helping the State identify and evaluate actions that can reduce rate and bill impacts as well as ensuring safe and reliable

[37] API RP 1173, available at: https://pipelinesms.org/rp-1173/.

operation of the gas system, supporting public health, prioritizing disadvantaged communities, and advancing opportunities to engage the affected gas workforce. Managing the gas transition to reduce and balance risks to affordability, reliability, and safety is a critical goal that is considered in this proceeding.

The current focus of work in this OIR is the implementation of Priority Neighborhood Decarbonization Zones (PNDZ), as directed by Senate Bill 1221 codified in Public Utilities Code Section 662(a). One factor considered in the identification of potential PNDZs is occurrence of a foreseeable gas system replacement project, which contemplates gas system safety.

GAS SAFETY PLAN APPENDIX

In D.12-04-010, the Commission stated gas operator safety plans "may reference existing components or include Exhibits or Attachments that cross-reference to other existing utility documentation[.]" Id. at 19. SDG&E has numerous existing safety programs, plans, and procedures in place that address specified infrastructure or areas of company activity. This Gas Safety Plan provides an overview that encompasses the plans, programs, and policies referenced in this document and affirms SDG&E's commitment to safety. The following matrix is a guide to the documents making up these plans, programs, and policies. Documents have been identified by their policy number and title and cross-referenced with the applicable Gas Safety Plan chapter.

Policy Document – Gas Safety Plan Matrix

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
108-03213	Pardon the Interruption		X		
2111SD	Management of Change - Request & Approval	X			
2112SD	Pipeline Database Update	X			
2120SD	Pipeline Feature Data Collection	X			
3084SD	Corrosion Tests General Data Sheet	X			
3222SD	Design Data Sheet (DDS)	X		X	X
3506SD	Notice of Shutdown	X			
40-00	Polyethylene Pipe and Tubing	X			
4002SD	Integrity Management Steel Pipe/Component Information Forms	X			
4090SD	100mV Polarization Form	X			
4091SD	Wax Casing Data Collection Form	X			
50-15	Pipe Nipples	X			
41-06.1	Pipe - Steel, Grades B through X65	X			
52-65	Fittings - Threaded, Malleable Iron	X			
52-80	Couplings - Electrofusion, Polyethylene	X			
52-81	Fittings, Socket & Saddle, Polyethylene Heat Fusion	X			
52-82	Fittings, Butt Type, Polyethylene Heat Fusion	X			
52-96	Fittings - Butt Weld Steel	X			
54-17	Flanges and Flanged Fittings	X			
54.17.1	Cast Iron Flanges	X			
56-40	Stop Cocks	X			
56-50	Steel to Plastic Transition Fittings	X			
56-70.1	Risers - Service, Anodeless	X			
56-70.16	Riser - Service Head Adapter	X			
58-10	Valves – Thermoplastic	X			
58.15.2	Valves; Ball, Steel Floating	X			
58-70	Valves - Plug, Lubricated, Positive Shut-Off	X			
58-82	Valves - Ball, Steel, Trunnion Mounted	X			
58-96.6	Valve - Relief, Large	X			
677-1SD	Pipeline Condition and Maintenance Report	X			
76-72	Odorant - 50/50 TBM/THT	X			
76-73	Thiophane Odorant	X			
78-02AM	Meters – Rotary				X

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
78-03AM	Meters – Turbine				X
ACF-SD	Assessment Completion Form	X			
C5050	Order Completion and Priority Scheduling	X	X	X	
C5140	Shutting-Off Gas Meters	X			
C5160	Gas Meter Turn-On Procedure	X		X	
C5190	Emergency Response Procedures for Gas Incidents	X	X	X	
C5200	Restoration of Service Due to Gas Outage	X	X	X	
C5260	Locking and Blanking of a Gas Meter Set	X		X	X
C5370	Large Meters - Houseline Testing				X
C5385	Maintenance & Lubricating of ¾" and 1" Service Valves	X			
C5390	Gas Curb Meter and Atmospheric Corrosion Inspection and Maintenance	X		X	X
C5450	Pressure Regulation - Residential and Commercial	X		X	
C5460	Fumigation Shut-Off and Back-On Orders				X
C5480	Purging Service Risers	X		X	X
C5490	Working in the Presence of Escaping Gas	X	X	X	X
C5500	Reportable Gas Incidents	X	X	X	
C5510	Leak Investigation - Customer Service Field (CSF)	X	X	X	X
C5520	Houseline Leakage on Master-Metered Systems	X		X	X
C5540	Setting Gas Meters				X
C5580	Re-Insulating Gas Meters				X
C5630	Power Outage Notification		X		
C5640	Verify Customer Generator Operation (VGEN)		X		
C5660	Purging Gas Meters and Customer Houselines	X		X	X
C5665	Odor Conditioning of New Customer-Owned Pipelines - Size (AC630) Meters and Larger				X
C5700	Service Policy				X
C5710	Back Flow Protection - Regulators and Check Valves			X	X
CRMP6SD	Gas Control Management of Change	X		X	
D7103	Gas Meter Location	X		X	
D7109	Gas Service Location	X		X	

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
D7110	Abandonment of Gas Service	X		X	X
D7113	Evaluation and Disposition of Inactive Services	X		X	
D7115	Barricades for Gas Meter Sets	X		X	
D7119	Earthquake Valves on Meter Sets				X
D7123	Service Regulator Vent Extensions	X		X	
D7125	Service Regulators in Curb Meter Boxes	X		X	
D7127	Curb Meter Box Excavation and Riser Replacement	X		X	
D7203	Polyethylene (PE) Pipe and Fittings – General Application Requirements	X		X	
D7211	Handling and Storage of Polyethylene (PE) Material	X		X	
D7213	Polyethylene Heater - Temperature Measurement and Adjustment	X			X
D7216	Mechanical Tapping Tee Inspection				X
D7221	Socket Fusion for Polyethylene	X		X	X
D7222	PE Saddle Fusions	X		X	X
D7225	Tapping/Stopping Polyethylene (PE) Fittings	X		X	X
D7227	Butt Fusion Polyethylene	X		X	X
D7233	Electrofusion for Polyethylene			X	
D7237	Transition Fittings			X	
D7247	Service Risers for Polyethylene (PE) Installations	X		X	
D7248	Service Riser Integrity Observation and/or Inspection	X		X	
D7249	Valve Installation and Valve Box Assemblies for Polyethylene	X		X	
D7251	Composite Coating Repair for Anodeless Risers	X		X	
D7252	Service Head Adapter - 3/4 Inch			X	X
D7255	Casing Assemblies - Plastic Carrier Pipe	X		X	X
D7257	Tracer Wire Installation for Polyethylene (PE) Pipe Installations			X	
D7265	Pneumatic Test Requirements for Pipelines Operating at 60 PSIG or Less	X		X	X
D7275	Polyethylene (PE) Pipe Repair	X		X	X
D7276	Polyethylene (PE) Tapping Tee Repair	X		X	X
D7279	Squeezing Polyethylene Pipe - 1/2" through 8"				X

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
D7293	Qualification Requirements for Polyethylene Fitters			X	X
D7305	McElroy Sidewinder Fusion Equipment			X	X
D7321	Service Connections to Steel Pipelines			X	
D7325	Service Punch Tee	X		X	X
D7341	Raising, Repairing, or Installing a Bypass on a ¾ and 1-Inch Steel or Anodeless Risers				X
D7371	Leak Repair Methods for Steel Distribution Pipelines	X		X	X
D7373	Cold Pipe Squeezer Operations and Maintenance Procedures				X
D7381	Abandonment or Inactivation of Gas Distribution Pipelines	X		X	X
D7382	Requirements for Hot/Cold Squeezing of Steel Pipelines				X
D7383	Steel Pipe Squeezer 6" through 12"	X			X
D7385	Retire from Service (RFS) of ¾-Inch and 1-Inch Service Nipples on Mains to be Upgraded				X
D7389	Retire from Service (RFS) of Corporation Valve				X
D7403	Underground Distribution (UD) Trenches and Utility Positioning			X	X
D7411	Trench Excavation Requirements for Steel Distribution Mains Operating at Greater Than 60 PSIG			X	X
D7412	Excavation Requirements: Trench with Two Distribution Mains or 3-Inch and Larger Steel Distribution Mains Operating At 60 PSIG or Less			X	
D7427	Standard Gas Main Positions for Distribution Mains			X	
D7428	Gas Trench Only (GTO) Specifications for San Diego County				
D7461	Gas Facilities Box (Inside Dimensions 2' X 3')			X	
D7465	Prefabricated Vaults - Design and Selection Guide			X	X
D7705	Regulator Station Installation Procedures				X
D7711	Regulator Station Design and Planning			X	X
D7715	Control Piping			X	X

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
D7905	Requirements for Pressure Control Operations on Distribution Pipeline Systems	X		X	X
D7907	Qualification Requirements Distribution Pressure Control				X
D7911	Purging 60 PSIG or Less Distribution Gas Lines into Service	X		X	X
D7912	Locking and Tagging Service Risers	X		X	X
D7919	Changing a 3/4 Inch and 1-Inch Service Valves				X
D7927	Mueller® D-5™ and Mueller® D-4™ Drilling Machine Instructions				X
D7929	Mueller Line Stopper Unit No. 1				X
D7931	Mueller® E-5 Drilling Machine, Mueller® E-4 Drilling Machine, and Mueller® EH-5 Drilling Machine				X
D7933	Stopping Off Procedure for Shop Made Service Ys and RFS Nipples				X
D7955	Pressure Control - 2" Top Half Fitting				X
D7956	Pressure Control - 3" and 4" Top Half Fitting				X
D7957	Pressure Control: 2-Inch Service Tee				X
D8146	DREAMS Replacement Strategy	X		X	
D8146	Replacement Criteria for Distribution Mains and Services	X		X	
D8164	Pressure Monitoring of Distribution Systems	X		X	X
D8167	Valve Inspection and Maintenance - Distribution	X		X	X
D8168	Quality Assurance (QA) Leakage Mitigation Assessment Requirements	X		X	
D8171	Curb Valve Inspections on Distribution Services	X		X	
D8175	Quality Assurance (QA) Pipeline Operations & Gas Instrument Shop Assessment Requirements	X		X	
D8189	Temporary LNG Facility	X			X
D8194	Sensit G2 Multigas Detector and SMART-CAL Operation and Maintenance Procedures				X
D8305	Trenchless Construction Methods	X		X	X
D8306	Prevention of Sewer Lateral Intrusions and				X

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
	Damage				
D8310	Polyethylene (PE) Pipe Inserted in Metal Casings			X	
D9102	Gas Mapping and Records	X		X	
D9103	Gas Distribution Terms and Definitions			X	
D9131	Design of Polyethylene Services			X	
D9135	Mains: Fittings and Fitting Selection			X	
D9157	Meter Selection and Spacing Requirements	X		X	
D9181	Valve Selection and Location- Services	X		X	
D9183	Excess Flow Valve Sizing			X	
DIMP1	Introduction	X			
DIMP2	System Knowledge	X			
DIMP3	Threat Identification	X			
DIMP4	Evaluate and Rank Risk	X			
DIMP5	Identify and Implement Measures to Address Risk	X			
DIMP6	Measure Performance, Monitor Results and Evaluate Effectiveness	X			
DIMP8	Periodic Evaluation and Improvement	X			
DIMP9	Report Results	X			
DIMPA	Terms, Definitions and Acronyms	X			
ER-1SD	Gas Emergency Response Plan	X	X	X	
ESHSD-0000	Phone Numbers				X
ESHSD-1100	Rule 1100 - Injury and Illness Prevention Program				X
ESHSD-1200	Rule 1200 - General Safety and Health Rules				X
ESHSD-1300	Vehicle and Forklift Safety				X
ESHSD-1400	Office Safety				X
ESHSD-1500	Fire Prevention				X
ESHSD-1600	Emergency Action Plan (EAP)				X
ESHSD-1700	Workplace Security				X
ESHSD-1800	Incident and Injury Reporting				X
ESHSD-2100	General Construction, Maintenance and Operation Safety Rules				X
ESHSD-2200	Aerial Lift and Hoisting Equipment				X
ESHSD-3100	Electric - General Safety Rules				X
ESHSD-3300	Electric Substation and Maintenance				X
ESHSD-3400	Overhead Electric - Distribution and Transmission				X

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
ESHSD-3600	Underground Electric - Distribution and Transmission				X
ESHSD-3800	Electrical Safety Hazards				X
ESHSD-4100	Gas Distribution and Transmission				X
ESHSD-9999	Definitions				X
F4-1SD	Threat Evaluation Form	X			
F8-1SD	Transmission Pipeline Assessment Plan Revisions Log	X			
G7002	Material Traceability for High-Pressure Systems	X			
G7008	Material Evaluation and Implementation	X			
G7011	Standard Specification for Natural and Substitute Fuel Gases	X		X	
G7017	Hydrogen Sulfide (H2S) Management	X		X	
G7022	Welding Inspector Operator Qualification	X		X	X
G7303	Maximum Allowable Operating Pressure (MAOP) Reconfirmation	X		X	X
G7305	Engineering Critical Assessment (ECA) Procedure	X		X	X
G7313	Steel Pipe Yield, Design Properties and Design Pressure Tables	X			
G7314	Steel Pipe - Selection Requirements	X		X	X
G7316	Identification of Steel Pipe and Butt Weld Fittings	X		X	X
G7321	Steel Butt-Weld Fittings - Selection Guide	X		X	X
G7328	Gas Control Telemetry Equipped Pipeline Rupture Identification and Response	X		X	X
G7345	Installation and Application of Mueller and TDW M Stop Control Fittings				X
G7350	Casing Assemblies - Steel Carrier Pipe	X		X	X
G7351	Wear Pads and Bands for Steel Gas Piping	X		X	X
G7353	Branch Connection, Steel - Selection Guide	X		X	X
G7355	Tinker & Rasor Holiday Detector Operation				X
G7361	Pipeline Testing Requirements	X		X	X
G7365	Pneumatic Test Requirement for Pipelines Operating Above 60 PSIG	X		X	X
G7369	Hydrostatic Test Requirements	X		X	X
G7371	Repair of Defects in Steel Pressure Piping	X		X	X
G7372	Repair of Imperfections on Steel Pressure Pipelines by Grinding	X			X

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
G7373	Repair of Non-Leaking Defects on an Operating Pipeline with a Band or Sleeve	X			X
G7374	Repair of Defects on Operating Pipelines Using Abandon Nipple				X
G7375	Approved Protective Coatings for Below Ground Corrosion Control	X		X	X
G7376	Field Tape Wrapping Requirements	X		X	X
G7377	External Surface Preparation, Field Application and Repairs of Fusion Bonded Epoxy Coating	X		X	X
G7379	External Surface Preparation and Field Applied Coatings for Buried Pipelines	X		X	X
G7380	External Surface Preparation and Field Application of Grease Wrap	X		X	X
G7381	External Surface Preparation and Coating Application for Steel Tanks and Vessels (New & Refurbished)	X		X	
G7382	Surface Preparation and Coating for Above Ground Piping and Steel Components	X			X
G7383	Internal Surface Preparation and Coating Application for Tanks, Vessels & Drip Legs (New & Refurbished)	X		X	
G7385	External Surface Preparation and Shop-Applied Coating for High Corrosion Service areas	X		X	X
G7387	AC Safety and AC Corrosion Threats	X		X	X
G7388	Indirect Coating Assessments	X		X	X
G7402	Notification of Excavation and Construction Activities - Assembly Bill Number 1937/ PUC Code 955.5			X	X
G7408	Backfill and Compaction Method			X	X
G7409	Typical Placement of Bedding, Shading, and Imported or Native Backfill Materials for Distribution Mains Operating At 60 PSIG or Less				X
G7410	Applications of Slurry Mixtures in Excavations				X
G7450	General Construction Requirements for Distribution Mains				X
G7451	Company and Company-Contractor Damage Prevention Excavation Requirements	X			

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
G7453	General Excavation Requirements			X	
G7460	General Construction Requirements for Distribution Service Lines				X
G7502	Records Management for Medium Pressure Project Closeout	X			X
G7505	General Procedures for Field As-Builts			X	
G7506	Archiving of High-Pressure Records in PDMS	X			X
G7507	GIS Maintenance Requirements for High Pressure Gas Lines	X			
G7508	Records Management for High Pressure Project Closeout	X			
G7520	Requirements for Designing Pipelines to Accommodate Smart Pigs	X			
G7603	Valve Usage and Selection Guide	X		X	X
G7605	Valving Responsibility - Distribution				X
G7615	Replacement and Raising of Valve Boxes			X	X
G7636	Lubrication of Plug Valves				X
G7643	Excess Flow Valve (EFV) - Installation and Operation	X		X	X
G7649	2 Inch Ball Valve Assembly for Drilling Through Pressurized Pipelines			X	
G7665	Flanges - Selection, Torque and Installation Requirements	X		X	X
G7803	General Welding Requirements	X		X	X
G7805	Welding Field Guide	X		X	X
G7809	Qualification and Re-Qualification of Welders	X		X	X
G7815	Inspection and Testing of Welds on Company Steel Piping	X		X	X
G7817	Radiographic Examination API 1104			X	X
G7821	Angles and Bends in Steel Piping			X	X
G7909	Purging Pipelines and Components	X		X	X
G7910	Purging Pipelines Using Air Movers for Cold Tie Operations	X		X	X
G7951	Drilling 4, 6 and 8-Inch Ball Valves				X
G7955	4 Inch Ball Valve Assembly for Hot Tapping to 800 PSIG			X	
G7959	Pressure Control: Drilling Operations for DH-5 Drilling Machine Using a 2-Inch Ball Valve				X

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
G7963	2 Inch Drilling Assembly for Drilling Existing 400 And 800 PSIG Pipelines			X	
G7974	T.D. Williamson (TDW) T-101b/T-101b-XL Drilling Machines	X		X	
G7979	Mueller Line Stopper Units 3SW (500) And 4SW (400)				X
G7980	Pressure Control: Mueller EH-5 Drilling Machine	X		X	
G7991	Gas Handling for Medium Pressure Projects	X		X	
G8001	Criteria for Cathodic Protection	X		X	
G8002	100mV Polarization Criteria	X		X	X
G8003	Design and Application of Cathodic Protection	X		X	X
G8006	Bond Wire and Lug Assembly and Braze Welding Processes				X
G8009	Electrical Test Stations & Bond Assembly	X		X	X
G8013	Cathodic Protection - Mixed Piping Systems	X		X	X
G8014	Galvanic Anodes for Corrosion Control	X		X	X
G8015	Selection and Installation of Rectifiers and Impressed Current Anodes	X			X
G8019	Operation and Maintenance of Cathodic Protection Facilities	X		X	X
G8020	Cathodic Protection Test Orders - Monitoring Isolated Facilities	X		X	X
G8021	Inspection of Exposed Pipe	X		X	X
G8022	Atmospheric Corrosion (ACOR) - Inspection of Meter Set Assemblies	X		X	X
G8023	Predicted Failure Pressure Analysis for Corrosion Metal Loss	X		X	X
G8024	Ultrasonic Thickness Examination for Materials	X			
G8025	Internal Corrosion Management Plan	X		X	X
G8026	External and Internal Transmission Pipeline Inspection	X		X	X
G8027	Cathodic Protection - Electrical Isolation	X		X	X
G8028	Cathodic Protection - Casings	X		X	X
G8029	Record Keeping - Corrosion Control	X		X	X
G8030	PFP Analysis of Cracks & Crack-like Defects	X		X	X

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
G8031	Internal Corrosion Design and Construction Considerations	X		X	X
G8035	Interference - Stray Electrical Current	X		X	X
G8037	Induced High Voltage Alternating Current (HVAC) on Pipelines				X
G8038	Curtailment Zones	X		X	
G8041	Cathodic Protection - Instruments and Testing Equipment	X			
G8042	Copper Sulfate Electrode	X			
G8043	Corrosion Control of Underground Hazardous Substance Storage Tanks				X
G8047	AC Current Density Monitoring	X		X	X
G8061	Internal Corrosion Mitigation for Hydrotesting	X		X	X
G8107	Aboveground Survey Plan	X			X
G8108	Alternating Current Attenuation Survey	X			X
G8109	Close Interval Survey	X			X
G8110	Voltage Gradient Survey	X			
G8111	Soil Resistivity Survey	X			
G8112	Inspection of Cased Pipe	X			
G8113	Operator Qualification Program	X		X	X
G8114	Self-Audit Guidelines - Pipeline Integrity Program	X			
G8115	Changing Maximum Allowable Operating Pressure and Maximum Operating Pressure	X		X	X
G8116	Pipeline and Related Definitions	X		X	X
G8121	Class Location - Determination and Changes	X		X	X
G8122	Prevention of 3rd Party Excavator and Company Contractor Excavation Damage to Company Subsurface Installations	X		X	X
G8123	Underground Service Alert and Temporary Marking	X		X	
G8129	Odorization	X		X	X
G8130	Operation of Odorator				X
G8133	ODORIZATION-YZ NJEX Odorant Injection System Maintenance				X
G8135	Leak Classification and Mitigation Schedules	X		X	X
G8137	Leak Investigation		X		X
G8138	Optical Methane Detector Operation and Maintenance				X

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
G8139	Company Facility Odor Assessment		X		X
G8140	Pipeline Patrol and Unstable Earth Inspections	X		X	X
G8141	Pipeline Markers	X		X	X
G8142	Inspection of Pipelines on Bridges and Spans	X		X	X
G8145	Leakage Surveys	X		X	X
G8147	Planning Shutdowns on High Pressure Gas Facilities	X	X	X	
G8159	Distribution Pressure Regulating and Monitoring Station & Vault - Inspection, Maintenance and Settings	X		X	X
G8160	Pipeline Cleaning Standard	X			
G8161	In-Line Inspection Surveys Standard	X			
G8162	Assessment of Pipeline Integrity Using Guided Wave UT	X			
G8163	GPS Control Survey	X			
G8164	Global Positioning System (GPS) Process	X			
G8166	Analysis of Assessment Findings	X			
G8168	Response to Conditions Discovered on Transmission Pipelines	X	X	X	X
G8169	Prevention of Accidental Ignition of Natural Gas	X	X	X	
G8170	Procedure for HCA Segment Identification	X			
G8171	CPUC and PHMSA Notification of Major New and Uprated Pipelines and Pressure Test Failures of Pipelines	X			
G8172	Data Gathering and Integration	X	X	X	X
G8173	Threat Identification and Evaluation	X			
G8174	TIMP Risk Assessment	X			
G8177	TIMP Risk Algorithm	X			
G8178	Transmission Pipeline Assessment Plan	X			
G8179	External Corrosion Direct Assessment Procedure	X			
G8180	In-Line Inspection Procedure	X	X		
G8184	Bellhole Inspection Requirements	X		X	X
G8185	Casing Wax Fill	X		X	X
G8186	Preventive and Mitigative Measures	X			
G8187	Continual Evaluation	X			

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
G8188	Stress Corrosion Cracking Direct Assessment Procedure	X			
G8192	RMLD - Remote Methane Leak Detector				X
G8198	Field Sampling and Analysis of Liquids and Solids/Sludge	X			
G8202	Field Guidelines - Emergency Incident Distribution / Customer Service	X	X	X	X
G8203	Off-Hour Management Coverage - Headquarters and Gas and Electric Construction Operations	X	X	X	X
G8204	Emergency Response Procedures for Gas Incidents - Distribution	X	X	X	X
G8205	Emergency Response Procedures for Gas Incidents - Transmission	X	X	X	X
G8206	Emergency Materials List for Gas Incidents	X	X	X	
G8208	Natural Disaster or Major Emergency - Employee Instructions	X	X	X	
G8215	Field Services (Distribution) On-duty Supervisor (ODS) Responsibilities		X	X	X
G8216	Incident Command System (ICS) for Emergency Incidents	X	X	X	
G8217	Supplemental Data Determination	X			
G8222	Pipeline Incident Reports to CPUC and PHMSA; National Transportation Safety Board (NTSB) Accident Investigation	X	X		X
G8223	Pipeline Safety Reports and Notifications to CPUC and PHMSA	X	X	X	X
G8225	Investigation of Pipeline Accidents and Failures	X	X	X	
G8229	Reports of Safety-Related Pipeline Conditions	X	X	X	X
G8237	Restoration of Service Policy and Responsibilities	X	X	X	
G8241	Responsibilities for Maintenance of the Downtown San Diego Emergency Curtailment Map	X	X	X	
G8245	Above Ground Leakage Classification and Mitigation Schedules	X	X	X	
G8246	PI Pigging Tray	X	X		
G8308	Contractor Safety Program	X			
G8315	Confined Space Operations			X	X
G8316	Event Learning Process (ELP)		X		X

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
G8320	Working in Hazardous Atmospheres	X	X	X	X
G8325	Operations and Maintenance Wildland Fire Prevention	X	X	X	X
G8345	Hot Work Permit Program			X	
G8356	Silica Dust Exposure Control Plan'	X		X	
G8365	Respiratory Protection Program	X		X	
G8366	Heat Illness Prevention				X
G8373	Wildfire Smoke Protection Program	X		X	
G8603	Designs for Pipelines in Bridges	X		X	X
G8605	Request for Pipeline Engineering Assistance	X		X	X
G8704	Mandatory Environmental Training	X			
G8706	Environmental Agency Inspections	X			
G8717	Industrial Waste Discharges to the Sanitary Sewer				X
G8719	Hydrostatic Test Water Management			X	X
G8736	Proposition 65 Compliance		X		X
G9103	Pressure Terminology and Establishment of Pressure Levels for Piping	X		X	X
G9105	Design Factors for Steel Piping Systems	X		X	X
G9109	Electrical Facilities in Hazardous Areas			X	X
G9125	Valve Automation	X		X	X
G9165	Requirements for Installing Gas Pipelines in or adjacent to Sloping Terrain	X		X	X
GC1SD	Gas Control Emergency Plan	X		X	X
PA-1SD	Public Awareness Plan		X		X
PP01.001SD	Management of Company Operations Standards	X	X		X
PP01.002SD	Management of Company Operations Standards - Definitions	X	X		X
PP02.018	Material Tracking and Traceability Levels	X			
PP02.019	Material Quality Assurance (QA) – Procedures and Guidelines	X			
QUALPROG	Quality Program Manual for Owner-User Inspection of Air Tanks				X
SDSD1020	Message Center Reporting (MCR)	X			
SMS-A1B	Employee Safety Incident Notification Process	X			
SMS-A5G	Process to Utilize Incident Evaluation Findings and Lessons Learned	X			
SMS-B1B	Process for Employees and Contractors to Raise Risk and Safety Concerns	X		X	X

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
SMS-B2A	Process to Identify and Manage External Stakeholders as Effective Safety Partners		X		X
SMS-D2B	Process to Identify Necessary Maintenance and Testing Procedures for Safety Critical Assets	X			X
SMS-D3A	Process for Management of Change for Safe Continuation of Operations	X		X	X
SMS-I1A	Process to Consistently Manage and Assess the Effectiveness of Safety Training and Awareness Programs	X			X
SMS-SWA	Stop/Pause Work Authority Process	X			
T7303	General Construction Requirements - Steel Transmission System			X	X
T7381	Abandonment, Conversion and Reinstatement of Transmission Pipelines	X		X	X
T7413	Minimum Trench Requirements for Transmission Pipelines	X		X	X
T8109	Gas Transmission Off Hour On-Call Procedures	X	X	X	X
T8129	Supplemental Odorization of Gas at Border Stations	X		X	
T8144	MAXIMO - Transmission	X			
T8146	Main Reciprocating Gas Compressor Unit Operation - Transmission	X		X	X
T8147	Gas Detectors in Gas Compressor Stations	X		X	X
T8148	Testing and Maintaining Compressor Station Emergency Shutdown Systems	X		X	X
T8150	Main Centrifugal Gas Compressor Unit Operation	X		X	
T8151	Compressor Station Equipment: Isolation and Hold-Out Procedures for Maintenance or Alterations	X		X	
T8154	Main Reciprocating Gas Compressor Maintenance - Transmission	X		X	
T8155	Fire Prevention and Protection - Transmission	X		X	
T8156	Main Centrifugal Gas Compressor Unit Maintenance	X		X	
T8157	Operation & Maintenance of Generator Units - Transmission Operations	X		X	X
T8165	Gas Transmission System Relief Valves	X		X	X

Policy	Title	Gas Safety Plan Chapter			
		4	5	6	7
T8166	Identification Numbers for Pipeline Valves - Transmission	X		X	
T8167	Valve Inspection and Maintenance - Transmission	X		X	X
T8170	Failure Analysis Process for Gas Systems	X		X	X
T8171	Abnormal Operations - Transmission	X	X	X	
T8172	Inspection Schedule - Regulator Station, Power Generating Plant Regulation Equipment Requirements	X		X	
T8173	Pressure Relief/ Pressure Limiting Devices Testing / Inspection	X		X	X
T8206	Tap Requirements	X		X	X
TIMP.0	Table of Contents	X			
TIMP.1	Introduction	X			
TIMP.10	Response to Assessment Findings and Repairs	X			
TIMP.11	Minimizing Environmental and Safety Risks	X			
TIMP.12	Preventive and Mitigative Measures	X			
TIMP.13	Continual Evaluation	X			
TIMP.14	Management of Change	X			
TIMP.15	Quality Assurance Plan	X			
TIMP.16	Record Keeping	X			
TIMP.17	Performance Plan	X		X	
TIMP.19	Communications Plan	X			
TIMP.20	Regulatory Interaction	X			
TIMP.3	HCA & MCA Identification	X			
TIMP.4	Data Gathering and Integration	X			
TIMP.5	Threat Identification, Threat Evaluation, and Risk Assessment	X			
TIMP.8	Assessment Plan	X			
TIMP.9	Integrity Assessments	X			
TIMP.A	Terms, Definitions and Acronyms	X			