



Risk Assessment and Mitigation Phase Cross-Functional Factor

(SDG&E-CFF-6)

Records Management

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Cross-Functional Factor: Records Management

I. INTRODUCTION

This Records Management Cross-Functional Factor (CFF) Chapter describes how records management activities impact the risks described in SDG&E's Risk Assessment Mitigation Phase (RAMP) risk chapters.

SDG&E is presenting CFF information in this RAMP Report to provide the Commission and parties additional information regarding the risks and mitigations described in its RAMP risk chapters. CFFs are not in and of themselves RAMP risks. Rather, CFFs are drivers, triggers, activities or programs that may impact multiple RAMP risks. CFFs are also generally foundational in nature. Therefore, SDG&E's CFF presentation differs from that of its RAMP risk chapters (*e.g.*, no risk spend efficiency calculations or alternatives are provided). SDG&E's CFF chapters provide narrative descriptions of the CFF projects and programs that impact multiple RAMP risk chapters through the 2022-24 time frame. Related cost forecasts are provided as available, consistent with an expected test year (TY) 2024 general rate case (GRC) request.

As described below, Records Management is an enterprise-wide approach to the management of operational records. Although this chapter is not intended to be a comprehensive discussion of all records in all departments, the Records Management CFF spans multiple lines of business and helps to mitigate several RAMP risks in this Report.

II. OVERVIEW

The goal of SDG&E's records management policies and practices is to provide consistent responsibilities for records management and to require the assignment of specific accountability for oversight and administration of records management. Accordingly, records management is a significant initiative, which strives to keep departments in compliance with changing rules and regulations at the local, state, and federal levels, as well as enforces generally accepted record-keeping principles (GARP). SDG&E's records management policies include, but are not limited to, definition and identification of records, processes and systems for retaining records, and document retention and disposition policy.

SDG&E has assigned records coordinators across the company. These records coordinators manage records and related issues, including compliance with records retention schedules, and are based within each of their respective business areas. They also share

information about updates to Sempra Energy’s Information Management Policy and the Legal Hold and Records Preservation Policy (collectively, “Policies”). Additionally, the records coordinators coordinate annual records cleanup and compliance certifications.

For safety and compliance purposes, SDG&E has implemented various recordkeeping controls for its system in accordance with, for example, the following CPUC regulations, decisions and directives:

- General Order (G.O.) 95: Overhead Electric Line Construction
 - Rule 18: Recordkeeping requirements for corrective actions to remedy potential violations of G.O. 95.
 - Rule 44.2: Recordkeeping requirements for pole loading calculations.
- G.O. 128: Construction of Underground Electric Supply and Communication Systems
 - Rule 17.7: Recordkeeping requirements and responsibility for records pertaining to the location of underground facilities.
- G.O. 165: Inspection requirements for electric distribution and transmission facilities
 - Section III and Section IV: Records management requirements for the inspection and maintenance of electrical assets for distribution and transmission facilities, respectively. Additionally, Section III.D requires submittal of an annual report identifying the asset inspection work completed.
- G.O. 166: Standards For Operation, Reliability, and Safety During Emergencies and Disasters.
 - Standard 11: Annual reporting requirement reflecting compliance with the G.O. and any modifications to the emergency plan.
- G.O. 174: Rules For Electric Utility Substations.
 - Section III: Substation inspection program records and reporting requirements.
- CPUC Decision (D.)14-02-015: Requirement to report fire ignitions annually.
- Resolution WSD-011 – Wildfire mitigation plan required filings and wildfire related metrics.

- Resolution ESRB-8, D.19-05-042, and D.20-05-051: Public Safety Power Shutoff reporting requirements.

III. ASSOCIATED RISK EVENTS

SDG&E adheres to the Policies' requirement that every employee take responsibility for information management. Thus, the management of operational asset records, as well as administrative records, is decentralized. While the Policies list some approved records repositories to use, there is no centralized records management tool, application, or product that meets the variety of recordkeeping needs of all departments. In addition, SDG&E uses both onsite and offsite records storage facilities based on the needs of each department or operating group.

Records management is a CFF affecting several risks including Incident Involving a Contractor, Incident Involving an Employee, Wildfire Involving SDG&E Equipment, as well as other cross-functional factors such as Safety Management System, Foundational Technology Systems, and Asset Management. Inadequately maintained records can have reliability, employee safety, public safety, regulatory, and fiscal impacts. For example, safety protocols must be followed in day-to-day operations, and if there are inadequate or inaccurate operational systems integrity documents being followed, the safety and compliance repercussions could be detrimental.

IV. 2020 PROJECTS AND PROGRAMS

SDG&E's records management group administers the Policies and acts as a resource to assist assigned coordinators in each department with applying and adhering to the Policies in their respective organizations. SDG&E's records management group works closely with each records coordinator to be consistent in oversight and use of best practices.

SDG&E conducts the activities listed below to promote employee accountability and compliance with the Policies.

- **Training on records management policies and procedures:** Employees are required to complete records management training every other year. Newly hired employees will complete the required training regardless of the time they were hired in the required training cycle. SDG&E also hosts regular records coordinator training on records management procedures and the steps needed to complete leadership certifications.

- **Annual department self-assessment and compliance:** Every year, coordinators complete both onsite and offsite records cleanup efforts in alignment with the records retention schedule. This cleanup is then certified by the appropriate members of leadership, thereby confirming compliance with the Policies.
- **Periodic internal audits:** In 2020, periodic internal assessments of randomly selected records management procedures began. These assessments, or audits, include (i) a review of the mapping of any given department's document repositories, (ii) process review, and (iii) an assessment of whether the department can readily produce critical records.
- **Information management systems (IMS):** SDG&E hosts a variety of approved document repositories to assist with departments' varying needs, including repositories for critical records held in our operations and asset management departments. Within these systems, teams house critical operations, maintenance, safety, legal, fiscal, and contractual records. The IMS allow employees to track and retain records and complete their day-to-day work tasks.

Some examples of supporting IMS include:

- **SAP:** Inventory control and material management.
- **Customer Information System Corporate Objectives (CISCO):** The core customer data management system, which is migrating to SAP in the Envision project and will be subsequently decommissioned. CISCO also includes the Distribution Planning and Scheduling System (DPSS) and some of the other customer-focused mainframe systems. Note: in the field, CITRIX is used to gain access to CISCO.
- **Supervisory Control and Data Acquisition (SCADA):** A system of software and hardware elements that allows the utility to control certain electric system processes locally or at remote locations; monitor, gather, and process real-time data; directly interact with devices such as sensors and valves; and record events into a log file.
- **Network Management System (NMS):** A distribution-network outage-management system that maintains the as-switched (current state) model of the electric distribution system.

- Pole Information Data System (PIDS): Web interface and repository that was created to store and display pole information such as general characteristics, loading information, aerial and avian information and the associated documents and images.
- Service Order Routing Technology (SORT): Dispatch software for Electric Troubleshooters (ETS)—the laptop computer system used to dispatch an ETS to a substation to investigate an alarm or conduct an inspection.
- Ignition Management Database: Fire ignitions are tracked and defined by CPUC Decision 14-02-015. A report of ignitions is submitted annually. Reports from this database are used to prioritize and track the success of ignition mitigation programs.
- Meteorology Database: Logs and houses historical wind speeds. This data is used heavily in the wildfire program to develop wind climatologies across the service territory that aide in decision-making during, for example, Public Safety Power Shutoffs (PSPS) events.
- Reliability Database: Program that categorizes system failures related to customer outages for use in developing wildfire ignition mitigation, system reliability improvement, and various public safety programs.
- Geographic Information Systems (GIS): Real-time information system for mapping and analytics. The geographic data is used in many ways, including the following:
 - Field Mobile Applications: Allows field staff to view their equipment locations and to update their work activities electronically.
 - Outage Management Integration: Provides the base network model enabling the operators to geospatially monitor their work activities and verifies the connectivity model to validate proper safe isolation points for field and public safety.
 - Emergency Operations: Provides real-time fire data, such as fire parameters, weather data, and crew locations, for decision making during an emergency event.

V. 2022-2024 PROJECTS AND PROGRAMS

SDG&E intends to hire a third-party records management vendor to perform a comprehensive program assessment of overall procedures and best practices, paying particular attention to records management practices for SDG&E's asset management and operations departments. This program assessment aims to map out the current state and detail potential roadmaps in areas needing improvement or adjustment. Some main aspects of this assessment include:

- Review RAMP and General Rate Case (GRC) filings regarding records management and its public safety risks, mitigation, and impacts;
- Review practices, Policies, regulations, general orders, and procedures at a high level (interviews and gap analysis);
- Complete a drill down assessment into system operations;
- Consider other efforts supporting asset management and RAMP risks; and
- Complete timely deliverables including but not limited to:
 - Assessment (current state);
 - Data governance review;
 - Strategy and standards review;
 - Regulatory and PUC obligations;
 - Technology and IMS inventory;
 - Records location and mapping;
 - Staffing and outsourcing;
 - Auditing;
 - Monitoring; and
 - Vendor will provide a completed roadmap of current state, recommendations, and timelines for new strategy implementations.

Additionally, SDG&E is working closely with Sempra to review the content of the biennial training to be included in the annual compliance training bundle. These conversations will be ongoing between SDG&E and Sempra.

VI. COSTS

Because of the manner in which the dollars associated with the programs and projects discussed in this CFF are tracked and/or forecast, there are no dollars identified for the programs and projects in this CFF.