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September 7, 2021

VIA EMAIL

Caroline Thomas Jacobs
Director, Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Docket #2021-SCs

Re: San Diego Gas & Electric Company's Request for a 2021 Safety Certification Pursuant to Public Utilities Code Section 8389

Dear Director Thomas Jacobs:

Pursuant to Public Utilities Code Section 8389(e)-(f), San Diego Gas & Electric Company ("SDG&E" or "Company") hereby requests issuance of a 2021 safety certification.

The Director of the Wildfire Safety Division (WSD) at the California Public Utilities Commission (Commission) approved SDG&E's 2020 Safety Certification Request on September 14, 2020.¹ Section 8389(f)(2) of the Public Utilities Code provides that an annual safety certification request must be submitted before the expiration of the prior certification, and that the Office of Energy Infrastructure Safety (Energy Safety), as successor to the Commission's Wildfire Safety Division (WSD) "shall issue a certification within 90 days of a request if the electrical corporation has provided documentation that it has satisfied the requirements of subdivision (e)" of Section 8389.² On July 26, 2021, Energy Safety issued its Final 2021 Safety Certification Guidance (2021 Safety Certification Guidance) addressing the timing of and process by which electrical corporations could meet the requirements for and request a safety certification for 2021. Consistent with the 2021 Safety Certification Guidance, this letter and the

¹ Letter from WSD Director Caroline Thomas Jacobs to Dan Skopec, *Wildfire Safety Division Approval of San Diego Gas & Electric Company's 2020 Safety Certification Request*, September 14, 2020 ("2020 Safety Certification Approval"). Available at <https://energysafety.ca.gov/wp-content/uploads/docs/safety-certificates/wsd-to-sdge-safety-certificate-20200914.pdf>.

² Public Utilities Code Section 8389(f)(4) provides that "[n]otwithstanding paragraph (1), a safety certification shall remain valid until the division acts on the electrical corporation's pending request for safety certification."

accompanying attachments comprise SDG&E's documentation that it has satisfied the requirements of Public Utilities Code Section 8389(e) and Energy Safety's guidance.

1. Approved Wildfire Mitigation Plan – § 8389(e)(1)

On February 7, 2020, SDG&E submitted its Wildfire Mitigation Plan (WMP) covering the years 2020 through 2022. On June 11, 2020, the Commission ratified Resolutions WSD-002 ("Guidance Resolution") and WSD-005 ("SDG&E Resolution"). In WSD-005, the Commission approved SDG&E's WMP and imposed several specific conditions on SDG&E's WMP. On the basis of this conditional approval, WSD determined that SDG&E "has satisfied the requirement under Pub. Util. Code §8389(e)(1) that 'the electrical corporation has an approved Wildfire Mitigation Plan.'"³

Pursuant to Public Utilities Code §8386(a) and WSD-011, SDG&E submitted its Annual Wildfire Mitigation Plan Update on February 5, 2021. On July 20, 2021, the Commission issued Resolution WSD-019, ratifying WSD's approval of SDG&E's 2021 Wildfire Mitigation Plan Update pursuant to Public Utilities Code Section 8386. Resolution WSD-019 noted that for 2021, the WSD revised its WMP review and approval process to eliminate future conditional approvals. As an alternative to conditional approvals, if the WSD found a critical issue with the 2021 submissions, it issued a Revision Notice requiring remediation of identified issues prior to evaluating the 2021 WMP Update submissions.⁴ SDG&E did not receive a Revision Notice addressing its 2021 WMP Update, and WSD's determination that SDG&E had satisfied the requirements of Public Utilities Code Section 8386(c) and the 2021 WMP Guidelines was ratified by the Commission.⁵

SDG&E's approved three-year Wildfire Mitigation Plan and its approved 2021 Wildfire Mitigation Plan Update meet the requirement of Public Utilities Code Section 8389(e)(1).

2. Good Standing and Safety Culture Assessment – § 8389(e)(2)

The 2021 Safety Certification Guidance established that "an electrical corporation can satisfy the 'good standing' requirement if Section 8389(e)(2) by agreeing to implement all of the findings (including recommendations for improvement) of its most recent safety culture assessment performed pursuant to Pub. Util. Code §§ 8386.2 and 8389(d)(4), if applicable."⁶ On September 2, 2021, Energy Safety publicly served the final Safety Culture Assessment Report, prepared by DEKRA along with the recommendations of the Assessment. On September 3, 2021, SDG&E responded to Energy Safety agreeing to implement the recommendations of the

³ 2020 Safety Certification Approval at 2-3.

⁴ WSD-019 at 8.

⁵ WSD-019 at Finding 4.

⁶ 2021 Safety Certification Guidance at §2.3, p. 4.

Safety Culture Assessment.⁷ SDG&E has thus satisfied the requirement that it is in “good standing” pursuant to Public Utilities Code Section 8389(e)(2).⁸

3. Safety Committee of Board of Directors – § 8389(e)(3)

The 2021 Safety Certification Guidance addresses the Board Structure and governance requirements established by Public Utilities Code Sections 8389(e)(3) and (e)(5) and includes a requirement that electrical corporations provide updates regarding their board safety committees. These requirements are addressed in turn.

a. SDG&E Board Safety Committee Members

The members of the Safety Committee of SDG&E’s Board of Directors for 2021 include:

Robert J. Borthwick: Mr. Borthwick’s relevant safety experience includes 16 years of energy industry experience. He has held executive leadership roles in environmental health, safety, and compliance functions across energy infrastructure and renewable energy business segments.

Caroline A. Winn: Ms. Winn has more than 30 years of experience of operational leadership experience. She has overseen executive roles in customer privacy, energy delivery and as the chief operating officer. In prior roles, Ms. Winn was responsible for 24/7 operational safety and reliability of the transmission and distribution system in SDG&E’s service territory as well as infrastructure planning to improve safety and reliability.

Erbin B. Keith: Since joining Sempra Energy in 1998, Mr. Keith has had responsibility for a variety of operational, safety and compliance functions. Mr. Keith, a licensed professional engineer and member of the Bar, chairs the SDG&E Safety Committee and liaises with the Sempra Energy Environmental, Health and Safety Committee.

Mr. Borthwick and Mr. Keith have served on the SDG&E Board Safety Committee since 2019. Ms. Winn joined the Safety Committee in 2021. SDG&E has included biographies of its Safety Committee members highlighting their relevant safety expertise and experience.⁹

Additionally, while not required by Public Utilities Code Section 8389(e), SDG&E notes that in 2019 the Company established a Community Wildfire Safety Advisory Council

⁷ See, Letter from SDG&E to Caroline Thomas Jacobs, *Agreement of San Diego Gas & Electric Company (U 902 M) To Implement the Recommendations of the Final Safety Culture Assessment Report*, September 3, 2021. OEIS Docket No. 2021-SCAs. (Attachment A).

⁸ Pub. Util. Code §8389(e)(2) specifically provides that an electrical corporation may satisfy the good standing requirement by “having agreed to implement the findings of its most recent safety culture assessment, if applicable.”

⁹ See Attachment B.

(“Community Advisory Council”) comprised of independent community members who possess extensive public safety and wildfire experience. The Community Advisory Council provides input and guidance to the Safety Committee and the Company on safety matters. It meets four times per year.

b. *The Safety Committee’s Role in Overall Corporate Governance*

The Safety Committee advises and assists SDG&E’s Board of Directors in the oversight of safely providing electric and natural gas services to the Company’s customers. The Safety Committee’s powers and responsibilities are delegated by the Board of Directors. As set forth in the Safety Committee Charter, those powers and responsibilities include overseeing SDG&E’s management and resolution of safety issues and monitoring safety performance. Currently, three of the four members of SDG&E’s Board of Directors serve on the Safety Committee.

c. *Significant Topics Covered by the Safety Committee and Implementation of Safety Committee Recommendations*

SDG&E’s quarterly Board Safety Committee meetings include thoughtful, robust discussion of safety issues affecting the Company and include discussion of ongoing community and wildfire safety efforts. These meetings are summarized and reported to Energy Safety and the Commission in SDG&E’s quarterly submissions (previously advice letters) documenting the ongoing implementation of SDG&E’s Wildfire Mitigation Plan pursuant to Public Utilities Code Section 8389(e)(7).¹⁰ The 2021 Safety Certification Guidance requires SDG&E to provide an additional update regarding significant topics covered by the Safety Committee and describe the implementation of the Committee’s recommendations. With respect to wildfire safety, since SDG&E’s last safety certification was granted, the Board Safety Committee has considered and recommended the following:

- At the January 12, 2021, Board Safety Committee meeting, the Committee recommended that SDG&E consider and make presentations on new wildfire safety technologies being deployed in 2021 and communications strategies for major emergencies, including strategies for dealing with potential failures of communications channels. On May 4, 2021, SDG&E made presentations to the Committee on these topics, answered the questions of the Safety Committee members, and participated in discussion.¹¹ With respect to SDG&E’s wildfire safety measures, Jonathan Woldemariam, SDG&E’s Director for Wildfire Mitigation, provided an overview of SDG&E’s new Wildfire Next Generation System (“WiNGS”), a risk-based decision support model to determine the most cost effective

¹⁰ SDG&E’s most recent quarterly notification to Energy Safety describing the actions and recommendations of the Board Safety Committee is attached as to this request as Attachment C. The notification as well as SDG&E’s previous advice letters submitted pursuant to Public Utilities Code §8389(e)(7) are also available at SDG&E’s WMP website, <https://www.sdge.com/2021-wildfire-mitigation-plan>.

¹¹ See AL-3572-E.

wildfire risk reduction investments, and the use of emerging technology such as artificial intelligence and intelligent image processing to address wildfire risk and reduce the impact of PSPS events.

- At the May 4, 2021, Board Safety Committee meeting, the Committee recommended that SDG&E review and present on its preparations for the 2021 wildfire season, including steps the Company is taking to ensure employee, contractor, and customer safety. On July 20, 2021, SDG&E made a presentation to the Committee on this topic.¹² Brian D’Agostino, SDG&E Director for Fire Science and Climate Adaptation, and Mr. Woldemariam discussed the increasing drought conditions in the western United States and the drought’s impact on live fuel moisture levels across southern California. Mr. D’Agostino updated the Committee on SDG&E’s situational awareness enhancements, including new cameras to measure chlorophyll and moisture content in vegetation and increased use of artificial intelligence for wildfire detection and weather modeling. Mr. Woldemariam discussed SDG&E’s efforts to accelerate strategic grid hardening and SDG&E’s ongoing vegetation management efforts. Mr. Woldemariam also updated the Committee regarding additional preparations SDG&E was taking in response to the significant 2021 drought conditions, such as additional inspections in the “Laguna Scar” area.

SDG&E summarizes the above recommendations and actions as “significant” for purposes of the safety certification because they pertain specifically to wildfire safety. But SDG&E’s Board Safety Committee continues to consider safety issues that affect all aspects of Company operations and the safety of SDG&E employees and the public. To that end, the Committee has also heard presentations on issues such as the Distribution Integrity Management Program (DIMP) and the replacement of certain aging gas pipe materials (DIMP Dreams), safety in energized substations, and SDG&E’s Serious Injury and Fatality (SIF) program. The Committee is also regularly updated on SDG&E’s overall safety performance metrics. As discussed further below, SDG&E described the recommendations of the Safety Committee to both the Commission and Energy Safety on August 25, 2021.

SDG&E’s Board Safety Committee and its efforts at safety governance at the Company meet the requirements of Public Utilities Code Section 8389(e)(3).

4. Executive Incentive Compensation Structure – § 8389(e)(4)

Consistent with WSD’s guidance regarding the 2021 executive compensation approvals, on January 15, 2021, SDG&E submitted a letter to WSD documenting its compliance with the executive compensation provisions within Public Utilities Code Sections 8389(e)(4) and (e)(6). On February 25, 2021, SDG&E provided a supplement to its 2021 executive compensation submission after SDG&E’s Board of Directors’ review and approval of the 2021 Variable Pay

¹² SDG&E’s *Quarterly Notification to the Office of Energy Infrastructure Safety Regarding SDG&E’s Implementation of its Wildfire Mitigation Plan, Pursuant to Public Utilities Code Section 8389(e)(7)*, dated August 2, 2021.

Plan which detailed the minimum, target, and maximum values of the metrics in the Plan. SDG&E also responded to comments on its executive incentive compensation structure submitted to WSD by The Utility Reform Network (“TURN”) and the Public Advocates Office (Cal Advocates). SDG&E incorporates those submissions documenting compliance with Public Utilities Code Sections 8389(e)(4) and (e)(6) by reference.

On August 11, 2021, Energy Safety issued a letter approving SDG&E’s 2021 executive compensation structure and finding that SDG&E’s executive compensation met the requirements of Public Utilities Code Sections 8389(e)(4) and 8389(e)(6)(A)(i).¹³ With this approval, SDG&E meets the requirements of Sections 8389(e)(4) and 8389(e)(6).

5. Board-of-Director-Level Reporting to the Commission on Safety Issues – § 8389(e)(5)

The 2021 Safety Certification Guidance established that Energy Safety would work with the Commission to coordinate at least one public meeting prior to the submission of the Safety Certification requests during which members of the electrical corporations’ boards would provide a report regarding safety issues.¹⁴ On August 25, 2021, the Commission hosted a public meeting on utility safety practices during which representatives from SDG&E and Southern California Edison presented on safety practices and answered questions from the Commission and the Energy Safety. SDG&E was represented by Erbin Keith, Deputy General Counsel at Sempra Energy and Chair of the SDG&E Board Safety Committee, and Kevin Geraghty, Senior Vice President for Electric Operations and Chief Safety Officer. Mr. Keith highlighted the role of SDG&E’s Board Safety Committee and the efforts of the Wildfire Safety Community Advisory Council, underscoring that the Safety Committee is more than a compliance obligation, but an important and meaningful opportunity to engage in a dialogue with Company leadership and personnel to improve safety efforts. Mr. Geraghty gave an overview of SDG&E’s safety practices, the Company’s emphasis on the reduction of safety instances, and provided a review on system hardening to mitigate wildfire risk and reduce PSPS impacts.

As directed in the 2021 Safety Certification Guidance, SDG&E is attaching the materials used in the August 25 public meeting to this safety certification request.¹⁵ Further, and as discussed herein, SDG&E has submitted reports to the Commission regarding the Safety Committee of its Board of Directors’ consideration of safety issues via advice letters and informational submissions submitted pursuant to Public Utilities Code Section 8389(e)(7). Consistent with the 2021 Safety Certification Guidance, SDG&E has met the requirements of

¹³ Letter from Caroline Thomas Jacobs to SDG&E, *Office of Energy Infrastructure Safety Approval of San Diego Gas & Electric Company’s 2021 Executive Compensation Structure Pursuant to Public Utilities Code Sections 8389(e)(4) and (e)(6)*, dated August 11, 2021. Available at <https://efiling.energy.ca.gov/Search.aspx?docket=2021-EC>.

¹⁴ 2021 Energy Safety Guidance at §2.5, p. 5.

¹⁵ See Attachment D.

Public Utilities Code Section 8389(e)(5) regarding Board of Director level reporting on safety issues.

6. Compensation Structure for Executive Officers – § 8389(e)(6)

See response to item 4 above.

7. Implementation of Approved Wildfire Mitigation Plan, Safety Culture Assessment and Safety Committee Recommendations Quarterly Advice Letters – § 8389(e)(7)

Since receiving its safety certification, SDG&E has continued to submit quarterly advice letters to the Commission and notifications to Energy Safety as required by Public Utilities Code Section 8389(e)(7).¹⁶ These include:

SDG&E Advice Letter 3708-E (March 8, 2021) - approved

SDG&E Advice Letter 33752-E (May 7, 2021)¹⁷ – approved

SDG&E Quarterly Notification Letter (August 2, 2021)¹⁸

Each submission complies with statutory requirements because it (1) details the implementation of its approved wildfire mitigation plan and most recent safety culture assessment (not applicable to SDG&E); (2) contains a statement of the recommendations of the Board of Directors Safety Committee meetings that occurred during the quarter; and (3) summarizes the implementation of the safety committee recommendations from the electrical corporation’s previous advice letter filing.

The 2021 Safety Certification Guidance requires that the electrical corporation demonstrate “meaningful progress in implementing [the] WMP” to receive a safety certification.¹⁹ The Guidance further defines “meaningful progress” as a requirement that the electrical corporation is “progressing toward the targets set forth in its WMP.”²⁰ SDG&E’s quarterly submissions continue to demonstrate that it is making on-time and on-target progress toward its WMP targets. SDG&E continues to track 35 quantitative metrics and 44 qualitative

¹⁶ When Energy Safety transitioned to the Department of Natural Resources, Pub. Util. Code § 8389(e)(7) was amended to change the quarterly advice letter requirement to a notification to Energy Safety, with an information-only submission to the Commission.

¹⁷ SDG&E supplemented its advice letter (with AL 3752-E-A) to include an attachment A (SDG&E’s WMP quarterly progress update), which was inadvertently excluded in the first version on May 10, 2021.

¹⁸ Pursuant to WSD’s transition to OEIS on July 1, 2021, the previous quarterly Assembly Bill 1054 advice letters are now notification letters that do not receive approval.

¹⁹ 2021 Safety Certification Guidance at Section 2.2, p.3.

²⁰ *Id.*

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metrics on 78 different mitigations proposed in its 2021 Wildfire Mitigation Plan Update. As demonstrated in its August 2, 2021 notification to Energy Safety, SDG&E is on-track or ahead-of-track for all but two of those targets, microgrids and drone inspections.²¹ As noted in SDG&E's Quarterly Notification, SDG&E is considering rescoping its planned microgrids due to evolving system hardening strategies. SDG&E also notes that the recent Independent Evaluator Report addressing SDG&E's compliance with its 2020 WMP initiatives, completed June 30, 2021, also documented SDG&E's "strong push" to achieve compliance with its WMP goals and did not note any areas of significant non-compliance.²² SDG&E thus meets Energy Safety's requirement to demonstrate meaningful progress toward the targets set forth in its WMP, and thus has established that it has met the statutory requirement of Public Utilities Code Section 8389(e)(7).

In conclusion, SDG&E meets the requirements of Public Utilities Code Section 8389(e). Accordingly, SDG&E respectfully requests that you expeditiously issue it a safety certification for the upcoming year. Please contact me if you have any questions about this request.

Sincerely,

/s/ Dan Skopec

Dan Skopec

Senior Vice President

& Chief Regulatory Officer

SAN DIEGO GAS & ELECTRIC COMPANY

Attachments

cc: Service List, R.18-10-007

²¹ SDG&E has included its most recent Quarterly Notification to Energy Safety, filed pursuant to Section 8389(e)(7) on August 2, 2021, as Attachment C to this safety certification request. The Attachment also includes additional information regarding the progress of the drone inspections and SDG&E's planned microgrids.

²² *Final Independent Evaluator Annual Report on Compliance*, 4LEAF, Inc. and Aerial Zeus LLC, on behalf of SDG&E, June 30, 2021. Available at https://energysafety.ca.gov/wp-content/uploads/docs/misc/wsd/independent-evaluators/sdge-ie-arc_final.pdf. SDG&E's comments clarifying the few identified areas of concern were submitted August 16, 2021 and are available at <https://efiling.energysafety.ca.gov/Search.aspx?docket=2021-IE>.

ATTACHMENTS

ATTACHMENT A



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September 3, 2021

VIA E-MAIL

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Director, Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Docket #2021-SCAs

**RE: AGREEMENT OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) TO
IMPLEMENT THE RECOMMENDATIONS OF THE FINAL SAFETY CULTURE
ASSESSMENT REPORT**

Dear Director Thomas Jacobs:

San Diego Gas & Electric (SDG&E) appreciates the Office of Energy Infrastructure Safety's (Energy Safety) efforts to prepare the 2021 annual safety culture assessments conducted pursuant to Public Utilities Code Section 8389(d)(4). Pursuant to Public Utilities Code Section 8389(e)(2), SDG&E may satisfy the "good standing" requirement for purposes of its annual safety certification request by agreeing to implement the findings of its annual safety culture assessment, if applicable. Energy Safety's letter of September 2, 2021, enclosing SDG&E's 2021 Safety Culture Assessment Report, instructs SDG&E to document its agreement for purposes of Section 8389(e)(2) via a letter submitted to Energy Safety.

By this letter, SDG&E agrees to implement all of the findings and recommendations for improvement of the Safety Culture Assessment Report for SDG&E. SDG&E further expresses its commitment to work with DEKRA and Energy Safety regarding their implementation.

Respectfully,

/s/ Laura M. Fulton
Attorney for
San Diego Gas and Electric Company

ATTACHMENT B

Erbin B. Keith-Safety Biography

Since joining Sempra Energy in 1998, Mr. Keith has held a variety of leadership positions, including Senior Vice President, Delivery and Operations, Sempra Energy Solutions and President of Sempra Energy Solutions; Vice President, Global Regulatory Affairs, Sempra Energy and Vice President, Regulatory Affairs and Chief Compliance Officer, Sempra Energy; Senior Vice President, General Counsel & External Affairs, Southern California Gas Company, and Chief Regulatory, Risk Officer and General Counsel, San Diego Gas & Electric (“SDG&E”). Mr. Keith currently serves as Deputy General Counsel for Sempra Energy.

Selected safety-related responsibilities:

Sempra Energy Solutions (2000-2004) Mr. Keith led operations for Sempra Energy Solutions (a former Sempra Energy subsidiary focused on the commercial and industrial energy market.). In his capacity as Senior Vice President, Mr. Keith had responsibility for safety functions.

Sempra Global; Sempra Energy (2004-2010) During this time, Mr. Keith was responsible for the safety and compliance functions of Sempra Global. Sempra Global included all Sempra-affiliated operations other than SDG&E and SoCalGas. Mr. Keith oversaw Sempra Global regulatory activity at CPUC, FERC and Mexico regulatory agencies, including authorizations for major projects, enforcement investigations, permitting and compliance plans. Mr. Keith managed environmental services and compliance for existing facilities and new project development. In 2008, Mr. Keith’s responsibilities were expanded to manage the external affairs organization in Mexico. From January 2009 – April 2010. Mr. Keith served as Chief Compliance Officer for Sempra Energy.

SDG&E (2014-2017) Mr. Keith served as chief risk officer (2016-2017) and general counsel for SDG&E, one of Sempra Energy’s regulated California utilities. As chief risk officer, Mr. Keith and his team were responsible for identifying safety risks and working with operational safety experts to assess and mitigate these risks.

Sempra Energy (2017-present) For the past three years, Mr. Keith has served as the legal advisor and liaison to the Environmental, Health and Safety Committee (“EHS&T Committee”) of the Sempra Energy Board of Directors. In this governance role, Mr. Keith assists the EHS&T Committee chairperson in identifying critical and relevant safety topics to be reviewed by the EHS&T Committee and assists the chairperson in the EHS&T’s committee report to the Sempra Energy Board of Directors.

Additional Professional Experience, Licenses and Education:

Mr. Keith is a member of the State Bars of California and Texas and a licensed professional engineer. Before becoming a lawyer, Mr. Keith was a lead engineer and project manager for Bernard Johnson, Inc. (and multi-disciplined engineering and construction management firm) and prior to that, at Suttles, Madget & Dabney Consulting Engineers. In 2001, Mr. Keith was selected as “Energy Professional of the Year” by the Association of Energy Engineers. He previously served on United States Department of Energy's first Federal Energy Management Advisory Committee.

Caroline A. Winn – Safety Biography

Before becoming the Chief Executive Officer for San Diego Gas & Electric (SDG&E) in August 2020, Ms. Winn held a variety of leadership positions at SDG&E and Southern California Gas Company (SoCalGas). She has more than 30 years of experience in power engineering, construction and operation of natural gas and electric systems, and customer service. Her previous roles included: Director of Transmission and Distribution Asset Management and Smart Grid; Director of Supply Management; Vice President and Chief Customer Privacy Officer; Chief Energy Delivery Officer; and Chief Operating Officer. Under her leadership, SDG&E has become widely recognized as an industry leader in wildfire safety innovations and climate adaptation. As CEO, Ms. Winn has made it her top priority to create a more proactive safety culture, where employees actively look out for each other and are encouraged to speak up about risks and vulnerabilities they observe in their everyday work environments, be it in the field or office. Ms. Winn is a champion of fostering psychological safety – taking away fears of humiliation, rejection, and punishment for speaking up.

Selected safety-related responsibilities:

Director of Transmission and Distribution Asset Management and Smart Grid (2007-2009)

Ms. Winn was responsible for the 24/7 operational safety and reliability of the transmission and distribution system in SDG&E's service territory, infrastructure planning to meet growing and changing needs, as well as implementation of smart grid technologies to improve safety and reliability.

Director of Supply Management (2009-2020)

Ms. Winn managed the supply chain to support one of largest construction booms in the history of SDG&E and SoCalGas. She oversaw \$1 billion in procurement and logistics of materials and services.

Vice President and Chief Customer Privacy Officer (2010-2015)

Ms. Winn mobilized a first-of-its-kind taskforce dedicated exclusively to address and resolve gas infrastructure leaks around the clock, lowering response time from an average of 120 minutes to 30 minutes. She led the development of a Behavior-Based Safety Program for Customer Service Field Technicians, which was also adopted by Electric Operations, and had direct responsibility for customer service field employees who ensure customers' homes are safe from a gas delivery perspective. Under her leadership, SDG&E also executed a full-scale transformation of the customer services organization, driving a paradigm shift in the way the company viewed, interacted and valued customers.

Chief Energy Delivery Officer (2015-2016)

Ms. Winn was responsible for safe and reliable delivery of both natural gas and electricity to customers. In addition, she oversaw customer services, and external and state legislative affairs.

Chief Operating Officer (2017-2020)

Ms. Winn was the prime architect of SDG&E's wildfire safety innovations and operating protocols during extreme weather events. Under her leadership, SDG&E undertook numerous fire hardening projects and implemented a suite of situational awareness tools, including a dense

network of weather stations, high-definition, live-streaming cameras that allow first responders to detect smoke and fires, and fire weather forecast prediction and forecast models. She was responsible for the company's compliance and adherence to its Wildfire Mitigation Plan.

Chief Executive Officer (2020-Present)

Ms. Winn has developed an enterprise-wide safety strategy and incorporated it into SDG&E's Strategic Plan. Trained in OSHA best practices herself, she requires SDG&E operating directors and members of the company's Executive Safety Council to obtain safety certifications. She serves as the executive sponsor of the company's Behavior-Based Safety Program, which includes leading indicators and identification of safe and at-risk behaviors. Other key endeavors she has undertaken to improve public, employee and contractor safety include:

- Spearheading a safety leadership program for front-line to executive-level employees that encompasses the International Brotherhood of Electrical Workers (IBEW) Code of Excellence.
- Establishing a contractor safety oversight organization, which engages a third-party administrator to ensure consistent qualifications, reporting of accidents and contractor accountability.
- Increasing field supervision job safety observations. Last year, SDG&E conducted more than 15,800 safety observations, up more than sevenfold from just three years ago.
- Enhancing safety communications to include timely reporting of near misses and sharing of lessons learned across the organization. SDG&E launched an app in 2020 to make it easier for employees to report near misses.

To further strengthen SDG&E's safety culture, Ms. Winn sponsored the development of an enterprise-wide Safety Management System (SMS) covering both its gas and electric operations and created a new executive position – chief safety officer – who is focused on fostering psychological safety and continuous improvement of processes and procedures to reduce injuries.

Robert Borthwick-Safety Biography

Mr. Borthwick has served in various capacities at Sempra Energy over the last 16 years. Most recently, he was general manager of Sempra Renewables, leading all aspects of Sempra's renewable energy business segment, including commercial development, finance and operations, as well as supporting the sale of its U.S. wind and solar assets. He was previously vice president and general counsel at Sempra Infrastructure, LLC, where he led the legal, environmental, health and safety, regulatory, human resources and external affairs groups supporting both Sempra Renewables and Sempra LNG. He also served as vice president and general counsel for Sempra U.S. Gas & Power, and associate general counsel for Sempra Energy. In 2019, he completed the 10 Hour OSHA safety training course. Mr. Borthwick currently serves as Deputy General Counsel for Sempra Energy.

Selected safety-related responsibilities:

Sempra Energy (2003-2012) Mr. Borthwick worked extensively on San Diego Gas & Electric's litigation arising out of three 2007 wildfires, specifically the Witch, Guejito, and Rice fires. He provided advice on changes and enhancements to SDGE's inspection and fire prevention procedures.

Sempra U.S. Gas & Power/Sempra Infrastructure (2013-2018) Mr. Borthwick had management and operational responsibility for a number of teams at Sempra U.S. Gas & Power and Sempra Infrastructure, including the environmental, health and safety (EHS) permitting and compliance functions. Safety practices included assigning a safety monitor to all major construction projects, establishing guidelines for qualified electrical worker designations, implementing a contractor safety screening process requiring contractors to meet safety metrics prior to submitting bids, establishing new minimum requirements for contractors performing critical lifts, and increasing the sharing of safety enhancements and lessons learned between plants and with industry groups. Mr. Borthwick led compliance committees for both companies and oversaw their annual risk assessments. Mr. Borthwick also served on the board of directors of two regulated public utilities, Mobile Gas in Alabama and Willmut Gas in Mississippi, from 2013 to 2016. In these board roles, he provided oversight on a variety of employee and public safety issues.

Sempra Renewables (2018-2019) As the General Manager for Sempra Renewables, Mr. Borthwick was responsible for operations, including health and safety. Sempra Renewables was a leader in safety compliance, conducting semi-annual safety summits to introduce new programs and share best practices, introducing a program to cross-train plant employees by having them lead semi-annual safety and environmental performance inspections at sister plants with support from safety and environmental professionals, and implementing a telemedicine service for employees at remote operating plants to provide better access to health care services. The Copper Mountain Solar complex in Nevada and the Mesquite Solar complex in Arizona were the first solar generation facilities in the United States to receive OSHA's VPP (Voluntary Protection Program) certifications.

Sempra Energy (present) Mr. Borthwick's responsibilities include overseeing Sempra Energy's compliance program and coordinating on compliance issues with its operating companies in

California, Mexico, Chile, and Texas. He served as vice chairman of the board of directors of Luz del Sur (luzdelsur.com.pe/en), the largest electric company in Peru, from March 2019 to April 2020, when Sempra sold its interest in the company.

ATTACHMENT C



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August 2, 2021

VIA E-MAIL

SUBJECT: QUARTERLY NOTIFICATION TO THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY REGARDING SDG&E'S IMPLEMENTATION OF ITS WILDFIRE MITIGATION PLAN, PURSUANT TO PUBLIC UTILITIES CODE SECTION 8389(e)(7)

Per Public Utilities Code Section 8389(e)(7) and the February 16, 2021 Wildfire Safety Division (WSD) Compliance Operational Protocols,¹ San Diego Gas & Electric Company (SDG&E or the Company) hereby submits to the Office of Energy Infrastructure Safety (OEIS) this notification detailing the implementation of its approved Wildfire Mitigation Plan and recommendations of the most recent safety culture assessment; a statement of recommendations of the Board of Directors Safety Committee (Safety Committee) meetings that occurred during the quarter;² and a summary of the implementation of the Safety Committee recommendations from SDG&E's previous advice letter.³

PURPOSE

The purpose of this notification is to comply with the requirements of Section 8389(e)(7), which were added to the Public Utilities Code by Assembly Bill (AB) 1054 on July 12, 2019, and subsequently amended by AB 148 on July 22, 2021 to reflect the transition of the Wildfire Safety Division at the California Public Utilities Commission to the Office of Energy Infrastructure Safety (OEIS). Section 8389(e)(7) requires electrical corporations to file a notice of implementation of its wildfire mitigation plan with OEIS "on a quarterly basis that details the implementation of both its approved wildfire mitigation plan and recommendations of the most recent safety culture assessment, and a statement of recommendations of the board of directors safety committee meetings that occurred during the quarter." Section 8389(e)(7) also requires that the notification "summarize the implementation of safety committee recommendations from the electrical corporation's previous notification and submission." SDG&E is simultaneously submitting this notice to the California Public Utilities Commission as an information only submittal.⁴

¹ The WSD's Compliance Operational Protocols provides guidance on the contents, format, and timing of the compliance reporting the WSD requires of the electrical corporations.

² This notification includes information relating to activities and events that occurred in the second quarter of 2021.

³ AL 3752-E.

⁴ Public Utilities Code Section 8389(e)(7).

BACKGROUND

Governor Newsom signed AB 1054 into law on July 12, 2019. AB 1054 contains numerous statutory provisions and amendments designed to enhance the mitigation and prevention of catastrophic wildfires – including wildfires linked to utility equipment – in California. AB 1054 added Section 8389 to the Public Utilities Code. Section 8389(e) establishes the requirements for annual safety certifications⁵ and, *inter alia*, requires electrical corporations to establish a safety committee of its board of directors composed of members with relevant safety experience, establish board-of-director-level reporting to the Commission on safety issues, and file quarterly submissions notifying OEIS and the Commission of the implementation of its Wildfire Mitigation Plan and other matters as described above.

DISCUSSION**Implementation of SDG&E's Approved Wildfire Mitigation Plan**

SDG&E continues to track 35 quantitative metrics and 44 qualitative metrics on 78 different mitigations proposed in its 2021 Wildfire Mitigation Plan Update. These mitigations involve a wide array of topic areas such as: inspection and maintenance programs, infrastructure replacement programs, and vegetation management programs designed to mitigate the risk of ignitions due to a fault on the electric system. SDG&E has mitigation programs to enhance situational awareness, which informs SDG&E's risk models and helps prioritize infrastructure replacement; and strategies and tools for real time decision making during emergency response or Public Safety Power Shutoff (PSPS) events. SDG&E also has mitigations intended to reduce the impact of a wildfire once an ignition has occurred, including high-definition cameras, ground and aerial fire suppression resources, and a fuels management program.

In addition, SDG&E has implemented measures to mitigate the customer impacts associated with PSPS events, including the installation of remote switches to limit the number of customers exposed to PSPS, the establishment of customer resource centers during PSPS events, and SDG&E's customer outreach programs.

In Attachment A hereto, SDG&E provides a breakdown of the progress on quantitative targets for these mitigations. In summary, SDG&E has fire hardened 70 miles of its electric system, completed 100% of its HFTD Tier 3 Inspections, and completed 58% of vegetation inspections through June 30, 2021. More information on these metrics can be found in SDG&E's Quarterly Initiative Update, also filed August 2, 2021.

Implementation of SDG&E's Most Recent Safety Culture Assessment

The WSD has issued guidance on its annual safety culture assessment process,⁶ and the 2021 first annual assessment commenced this spring. SDG&E provided all of the requested documentation to its third party contractor as part of its safety culture assessment. SDG&E also initiated its survey in May 2021. As the safety culture assessment has not yet been finalized, SDG&E has no information to report regarding implementation at this time. Once SDG&E's safety culture assessment is completed, SDG&E will include implementation information in future advice letters.

⁵ SDG&E received its 2020 safety certification from the WSD via a letter dated September 14, 2020.

⁶ See Resolution WSD-011.

July 20, 2021, Safety Committee Meeting

The SDG&E Board Safety Committee⁷ advises and assists the Board of Directors in the oversight of safely providing electric and natural gas services to the Company's customers. The Safety Committee held a meeting on July 20, 2021, in which it received presentations from SDG&E management and employees, as discussed below. During the meeting, the Safety Committee asked questions and engaged with SDG&E management and employees regarding the subjects of their presentations.

At the July 20 meeting, the Safety Committee received the following presentations from SDG&E management and employees regarding safety issues, as follows.

Kevin Geraghty, SDG&E's Chief Safety Officer and its Senior Vice President for Electric Operations, reported on SDG&E's safety performance metrics to date. Ron Kiralla, SDG&E Director for Safety updated the Committee on SDG&E's "Serious Injury and Fatality (SIF) Program," including a review of all near-miss incidents that could have resulted in serious injury. Mr. Kiralla explained that SDG&E's SIF Program analyzes such incidents to gain insights and implement lessons learned. Mr. Kiralla updated the Committee on the ongoing SIF training for safety leaders throughout SDG&E, as well as operational supervisors and managers over the past few months. Mr. Kiralla and Mr. Geraghty answered the Committee members about the SIF program and SDG&E's safety performance metrics. Mr. Geraghty explained that the Committee recommendations from the prior meeting, including preparations for the 2021 fire season and safety in energized substations, would be covered during the meeting.

Jonathan Woldemariam, SDG&E Director of Wildfire Mitigation, and Brian D'Agostino, SDG&E Director of Fire Science and Climate Adaptation, briefed the Committee on the status of SDG&E's preparations for the 2021 wildfire season. Mr. D'Agostino briefed the Committee on the drought in the western United States and the potential for above average red-flag warning events in 2021. Mr. D'Agostino discussed SDG&E's weather forecasting capabilities, including AI-based forecasting models and satellite sensing capabilities. Mr. Woldemariam discussed SDG&E's grid-hardening strategies and vegetation management program, noting that increased inspections will continue to proactively address and reduce risk in the highest fire threat areas. Mr. Woldemariam also briefed the Committee on enhanced community and customer outreach, training for public safety partners, and integration of lessons learned to improve community outreach in preparation for potential PSPS events. Mr. Woldemariam and Mr. D'Agostino then responded to questions from the Committee regarding these topics.

Jamie Padilla, a START engineer for SDG&E's Kearny Operations and Maintenance group, gave an overview of maintenance and operations, highlighting safety and training at energized substations. Ms. Padilla reviewed the safety measures embedded in the phases of a construction project lifecycle and reported on the safety precautions taken during each phase. Ms. Padilla noted that the Kearny Operations and Maintenance group is well equipped with proper tools needed to perform operations safely and reported on the continuous efforts to improve safety at SDG&E's facilities, including the Kearny facility and substations. These efforts include near-miss reporting, the SIF Program, and SDG&E's efforts to achieve Voluntary Protection Program Star site recognition from Cal-OSHA. Ms. Padilla responded to questions regarding her presentation.

Roger Schwecke, Senior Vice President and Chief Infrastructure Officer for Southern California Gas Company, and Gina Orozco, Vice President for Gas Engineering and System Integrity at Southern California Gas Company, presented on gas safety matters, including the Distribution Integrity Management Program (DIMP) and supply issues related to certain small diameter

⁷ The Safety Committee members include Erbin B. Keith, Chairman; Robert J. Borthwick; and Caroline A. Winn.

polyethelene pipe. Mr. Schwecke provided background on the DIMP program, which was designed to replace early vintage gas distribution mains and services. Ms. Orozco reported that the Company is moving toward the use of quantitative risk modeling to address safety risks and construction threats, and provided an update on the DIMP replacement plan, including progress to date.

Mr. Schwecke and Ms. Orozco provided background on potential quality concerns with certain small diameter polyethelene pipe and the Company's response to the issue, including immediate actions taken to "stop the job" on pipe installations and efforts to quarantine the pipe, communicate with internal and external stakeholders, and assess impacts. Christina Ihrig, SDG&E Vice President for Operations Support, discussed SDG&E's efforts to secure alternative supplies for construction and maintenance.

Lastly, Erbin Keith, Chair of the Safety Committee, provided the following Safety Committee recommendations to SDG&E:

- SDG&E should make presentations at an upcoming Safety Committee meeting on the following topics:
 - Safety issues related to inspection of overhead lines, including training requirements for inspectors and quality assurance/quality control processes.
 - The Company's efforts to ensure workforce safety related to covered conductor construction and maintenance.
 - The safety of Access and Functional Needs customers during wildfire or PSPS events.

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

As noted in AL 3708-E, SDG&E's Safety Committee provided the following recommendations to the company at the May 4, 2021, meeting:

SDG&E should make presentations at upcoming Safety Committee meetings on the following topics:

- 2021 California legislative efforts to mitigate wildfires, including Senate Bill 85.
- SDG&E's preparations for the upcoming 2021 fire season, including the steps SDG&E is taking to ensure employee, contractor, and customer safety.

At the July 20 meeting, as noted above, Jonathan Woldemariam and Brian D'Agostino covered the second topic. As California's legislative session has not yet concluded, SDG&E will address legislative efforts related to wildfire at a future meeting.

UPDATE ON SDG&E'S WILDFIRE SAFETY COMMUNITY ADVISORY COUNCIL MEETINGS

Per the requirement established in D.20-05-051 that SDG&E report on advisory council activities on a quarterly basis, SDG&E's Wildfire Safety Community Advisory Council met on May 21, 2021. The Wildfire Safety Community Advisory Council is comprised of several important stakeholders in the SDG&E community, and includes representatives from local and tribal governments, public safety partners, and Access and Functional Needs communities.

SDG&E's Chief Executive Officer, Caroline Winn, opened the meeting and provided updates regarding SDG&E's ongoing efforts to mitigate wildfire risk, including its newest sustainability initiative involving goat grazing near electrical infrastructure to address vegetation growth. Ms. Winn also addressed new shareholder-funded grants to local tribal communities to address the

digital divide exacerbated by the COVID-19 pandemic. SDG&E worked with tribal leaders to identify and target tribal communities in need when providing the grant.

SDG&E's Director of Fire Science and Climate Adaptation, Brian D'Agostino provided an update on weather conditions and the impact of the ongoing drought on the 2021 fire season. Several stakeholders asked questions and provided input regarding preparation for fire season in light of the dry weather. Mr. D'Agostino then presented on SDG&E's partnerships and relationships with academic institutions to study climate science and apply the findings to improve electric system operations. After the presentation, Ms. Winn noted that the new technology developed through these partnerships improves SDG&E's and our communities' situational awareness capabilities and allows the Company to mitigate wildfire risk and address other potential reliability threats like coastal flooding.

David Buckley, Vice President and Chief Operating Officer at Technosylva, presented on Technosylva's efforts to develop fire science and fire modeling capabilities. Mr. Buckley discussed the origins and refinement of SDG&E's fire models and SDG&E's efforts to develop an unprecedented comprehensive fire model to predict fire risk before a fire starts. He added that Technosylva now partners with agencies like CAL FIRE and performs over 10 million fire simulations daily. Mr. Buckley also presented to the Council on Technosylva's recent PSPS analysis performed for the Commission and discussed Technosylva's findings that SDG&E's PSPS events in 2019 aided in preventing damage from catastrophic wildfires in SDG&E's service territory.

The next Wildfire Safety Community Advisory Council meeting is scheduled to take place on August 18, 2021.

NOTICE

A copy of this filing has been served on the utilities and interested parties shown on the attached list, including interested parties to service lists R.18-10-007 and R.18-12-005, by providing them a copy electronically.

Respectfully submitted,

/s/ Laura M. Fulton
Attorney for
San Diego Gas and Electric Company

Attachment A
2021 Progress Update Q2

SDG&E's 2021 Wildfire Mitigation Plan 2nd Quarter Progress Update

(All data as of June 30th, 2021)

2021 Wildfire Mitigation Plan Activities Q2 Summary



7.3.2 – Situational Awareness & Forecasting	7.3.4 – Asset Management & Inspections						7.3.5 – Vegetation Management & Inspections	
<p>7.3.2.1 Advanced weather monitoring and weather stations</p> <p>7.3.2.3 Fault indicators for detecting faults on electric lines and equipment</p> <p>7.3.2.4.1 Fire Science & Climate Adaptation Department</p>	<p>7.3.4.1 Detailed inspections of distribution electric lines and equipment</p>	<p>7.3.4.2 Detailed inspections of transmission electric lines and equipment</p>	<p>7.3.4.4 Infrared inspections of distribution electric lines and equipment</p>	<p>7.3.4.5 Infrared inspections of transmission electric lines and equipment</p>	<p>7.3.4.6 Intrusive pole inspections</p>	<p>7.3.4.9.1 HFTD Tier 3 inspections</p>	<p>7.3.5.2 Detailed inspections of vegetation around distribution electric lines and equipment</p>	
	<p>7.3.4.9.2 Drone assessments of distribution infrastructure</p>	<p>7.3.4.9.4 Drone assessments of transmission infrastructure</p>	<p>7.3.4.9.5 Additional transmission aerial 69kV tier 3 visual inspection</p>	<p>7.3.4.10 Patrol inspections of distribution electric lines and equipment</p>	<p>7.3.4.11 Patrol inspections of transmission electric lines and equipment</p>	<p>7.3.4.14 Substation inspections</p>	<p>7.3.5.5 Fuels management and reduction of "slash" from vegetation management activities</p>	
7.3.3 – Grid Design & System Hardening								
<p>7.3.3.1 Capacitor maintenance and replacement program</p>	<p>7.3.3.3 Covered conductor installation</p>	<p>7.3.3.7 Expulsion fuse replacement</p>	<p>7.3.3.8.1 PSPS sectionalizing enhancements</p>	<p>7.3.3.8.2 Microgrids</p>	<p>7.3.3.9 Installation of system automation equipment</p>	<p>7.3.3.10 Maintenance, repair, and replacement of connectors, including hotline clamps</p>	<p>7.3.3.11.1 Resiliency grant programs</p>	<p>7.3.5.9 Other discretionary inspection of vegetation around distribution electric lines and equipment, beyond inspections mandated by rules and regulations</p>
<p>7.3.3.11.2 Standby power programs</p>	<p>7.3.3.11.3 Resiliency assistance programs</p>	<p>7.3.3.16 Undergrounding of electric lines and/or equipment</p>	<p>7.3.3.17.1 Distribution overhead system hardening</p>	<p>7.3.3.17.2 Transmission overhead system hardening</p>	<p>7.3.3.17.3 Cleveland National Forest distribution and transmission system hardening</p>	<p>7.3.3.18.1 Distribution communications reliability improvements</p>	<p>7.3.3.18.2 Lightning arrestor removal and replacement</p>	<p>7.3.5.20 Vegetation management to achieve clearances around electric lines and equipment</p>

Complete
 Ahead of Plan
 On Track
 Off Track

Q2 Activity Status vs 2021 Goals

7.3.2 – Situational Awareness and Forecasting

7.3.2.1

35

Weather station upgrades

140% Advanced weather monitoring & station upgrades
Volume vs 2021 Goal: 35 of 25 weather station upgrades (140%)
Key Actions: Goal exceeded due to available inventory and available work crews.

7.3.2.3

39

Wireless fault indicators

8% Fault indicators for detecting faults on electric lines and equipment
Volume vs 2021 Goal: 39 of 500 wireless fault indicators (8%)
Key Actions: Program is expected to meet target by year end.

7.3.2.4.1

1

Cameras installed

6% Fire Science & Climate Adaptation Department
Volume vs 2021 Goal: 1 of 17 cameras installed (6%)
Key Actions: A contracting delay was resolved, allowing program start. Program is expected to meet target by year end.

Q2 Activity Status vs 2021 Goals

7.3.3 – Grid Design and System Hardening (1 of 2)

7.3.3.1
26
SCADA capacitors

81% Capacitor maintenance and replacement program
Volume vs 2021 Goal: 26 of 32 SCADA capacitors (81%)
Key Actions: Program on time and target.

7.3.3.7
808
Expulsion fuses

20% Expulsion fuse replacement
Volume vs 2021 Goal: 808 of 3,970 expulsion fuses (20%)
Key Actions: Redesigns due to accounting issues for combined projects caused delay. Program expected to meet target by year end.

7.3.3.8.2
0
Microgrids

0% Microgrids
Volume vs 2021 Goal: 0 of 2 microgrids (0%)
Key Actions: Sherilton Valley is currently being evaluated against scheduled grid hardening efforts. Cameron South will be descoped due to undergrounding efforts and critical infrastructure in place.

7.3.3.10
1,546
Hotline clamps

69% Maintenance, repair, and replacement of connectors, including hotline clamps
Volume vs 2021 Goal: 1,546 of 2,250 hotline clamps (69%)
Key Actions: Program on time and target.

7.3.3.3
1.2
miles CC

6% Covered conductor installation
Volume vs 2021 Goal: 1.2 of 20 miles covered conductor (6%)
Key Actions: Heavier construction period expected in Q3/Q4 due to scoping changes from Traditional to Covered Conductor

7.3.3.8.1
6
Sectionalizing devices

60% PSPS sectionalizing enhancements
Volume vs 2021 Goal: 6 of 10 sectionalizing devices (60%)
Key Actions: Program on time and target.

7.3.3.9
2
Circuits enabled

25% Installation of system automation equipment
Volume vs 2021 Goal: 2 of 8 circuits enabled (25%)
Key Actions: Program on time and target.

7.3.3.11.1
59
Generators

3% Resiliency grant programs
Volume vs 2021 Goal: 59 of 2,000 generators (3%)
Key Actions: Delay on battery delivery. Program expected to meet target by year end.

Q2 Activity Status vs 2021 Goals

7.3.3 – Grid Design and System Hardening (2 of 2)

<p>7.3.3.11.2</p> <p>206</p> <p>Generators</p>	<p>50% Standby power programs Volume vs 2021 Goal: 206 of 413 generators (50%) Key Actions: Program on time and target.</p>
<p>7.3.3.16</p> <p>17.9</p> <p>Miles UG</p>	<p>72% Undergrounding of electric lines and/or equipment Volume vs 2021 Goal: 17.9 of 25 miles UG (72%) Key Actions: Program on time and target.</p>
<p>7.3.3.17.2</p> <div style="border: 1px solid black; padding: 2px; margin-bottom: 5px; text-align: center;"> <p>1.5 OH</p> </div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 5px; text-align: center;"> <p>0 DUB</p> </div>	<p>16% Transmission overhead system hardening Volume vs 2021 Goal: 1.5 of 6.7 miles OH (22%), 0 of 2.7 miles DUB (0%) Key Actions: Program on time and target.</p>
<p>7.3.3.18.1</p> <p>1</p> <p>Base stations</p>	<p>10% Distribution communications reliability improvements Volume vs 2021 Goal: 1 of 10 base stations (10%) Key Actions: Remaining base stations targeting completion in Q3/Q4 of 2021.</p>

<p>7.3.3.11.3</p> <p>0</p> <p>Generators</p>	<p>0% Resiliency assistance programs Volume vs 2021 Goal: 0 of 1250 generators (0%) Key Actions: Program to begin receiving data late July, data to be reported in Q3.</p>
<p>7.3.3.17.1</p> <p>43.6</p> <p>Miles hardened</p>	<p>44% Distribution overhead system hardening Volume vs 2021 Goal: 43.6 of 100 miles hardened (44%) Key Actions: Program on time and target.</p>
<p>7.3.3.9</p> <p>6.5</p> <p>Miles Distribution OH</p>	<p>96% Cleveland National Forest distribution and transmission system hardening Volume vs 2021 Goal: YTD totals include primary and secondary conductor installs.</p>
<p>7.3.3.18.2</p> <p>386</p> <p>Lightning arrestors</p>	<p>42% Lightning arrestor removal and replacement Volume vs 2021 Goal: 386 of 924 lightning arrestors replaced (42%) Key Actions: Program on time and on target.</p>

All data is up to date as of June 30th, 2021

Complete
 Ahead of Plan
 On Track
 Off Track

Q2 Activity Status vs 2021 Goals

7.3.4 – Asset Management and Inspections (1 of 2)

7.3.4.1
19,088
 Inspections

86% Detailed inspections of distribution electric lines and equipment
Volume vs 2021 Goal: 19,088 of 22,269 inspections (86%)
Key Actions: Program on time and target.

7.3.4.9.4
223
 Inspections

8% Drone assessments of transmission infrastructure
Volume vs 2021 Goal: 223 of 2,715 inspections (8%)
Key Actions: Currently scoping additional inspections to complete in Q3/Q4.

7.3.4.4
3,908
 Inspections

22% Infrared inspections of distribution electric lines and equipment
Volume vs 2021 Goal: 3,908 of 18,000 inspections (22%)
Key Actions: Program will continue to ramp up in Q3/Q4.

7.3.4.2
1192
 Inspections

61% Detailed inspections of transmission electric lines and equipment
Volume vs 2021 Goal: 1192 of 1943 inspections (61%)
Key Actions: Program on time and target..

7.3.4.5
0
 Inspections

0% Infrared inspections of transmission electric lines and equipment
Volume vs 2021 Goal: 0 of 6166 inspections (0%)
Key Actions: Program scheduled to resume in August.

7.3.4.6
6,754
 Inspections

69% Intrusive pole inspections
Volume vs 2021 Goal: 6,754 of 9,796 inspections (69%)
Key Actions: Program on time and target.

7.3.4.9.2
0
 Inspections

0% Drone assessments of distribution infrastructure
Volume vs 2021 Goal: 0 of 22,000 inspections (0%)
Key Actions: Delays in contracting caused program start date to slip and will ramp up in early Q3. Program is expected to meet target by year end.

7.3.4.9.1
10,841
 Inspections

100% HFTD Tier 3 inspections
Volume vs 2021 Goal: 10,841 of 10,815 inspections (100%)
Key Actions: Program completed for 2021.

All data is up to date as of June 30th, 2021

■ Complete
 ■ Ahead of Plan
 ■ On Track
 ■ Off Track

Q2 Activity Status vs 2021 Goals

7.3.4 – Asset Management and Inspections (2 of 2)

7.3.4.9.5

0

Inspections

0% Additional transmission aerial 69kV tier 3 visual inspection

Volume vs 2021 Goal: 0 of 1654 inspections (0%)

Key Actions: Program resumes in August.

7.3.4.14

179

Inspections

54% Substation inspections

Volume vs 2021 Goal: 179 of 330 inspections (54%)

Key Actions: Program on time and target.

7.3.4.10

61,830

Inspections

72% Patrol inspections of distribution electric lines and equipment

Volume vs 2021 Goal: 61,830 of 86,000 inspections (72%)

Key Actions: Program on time and target.

7.3.4.11

6,094

Inspections

96% Patrol inspections of transmission electric lines and equipment

Volume vs 2021 Goal: 6,094 of 6324 inspections (96%)

Key Actions: Program on time and target.

Q2 Activity Status vs 2021 Goals

7.3.5 – Vegetation Management and Inspections

7.3.5.2

233,867
Trees inspected

51% Detailed inspections of vegetation around distribution electric lines and equipment

Volume vs 2021 Goal: 233,867 of 455,000 trees inspected (51%)

Key Actions: Program on time and target.

7.3.5.5

0
Poles cleared

0% Fuels management and reduction of "slash" from vegetation management activities

Volume vs 2021 Goal: 0 of 500 poles cleared (0%)

Key Actions: Program resumes in early September.

7.3.5.9

6,065
Trees trimmed/removed

36% Other discretionary inspection of vegetation around distribution electric lines and equipment, beyond inspections mandated by rules and regulations

Volume vs 2021 Goal: 6,065 of 17,000 trees trimmed/removed (36%)

Key Actions: Program on time and target.

7.3.5.20

32,744
Poles brushed

92% Vegetation management to achieve clearances around electric lines and equipment

Volume vs 2021 Goal: 32,744 of 35,500 poles brushed (92%)

Key Actions: Program on time and target.

Appendix

Off Track Activity Details

2021 WMP Off Track Activities – Details

7.3.3.8.2

0

Microgrids

0% Microgrids

Volume vs 2021 Goal: 0 of 2 microgrids (0%)

Key Actions: Sherilton Valley is currently being evaluated against scheduled grid hardening efforts. Cameron South will be descoped due to undergrounding efforts and critical infrastructure in place.

The Microgrids initiative (7.3.3.8.2) is not on track to meet the target of two additional microgrids for 2021. One site is being re-assessed for other grid hardening initiatives, and the second site has been removed from scope as those customers will have the PSPS impact mitigated by the Strategic Undergrounding (7.3.3.16) initiative. SDG&E continues to look for and develop additional microgrid sites for implementation in 2022. The microgrid spend is still on track as SDG&E converts existing microgrid sites from traditional generation to renewable power sources. SDG&E expects to meet the risk reduction targets for the initiative in future years.

7.3.4.9.4

223

Inspections

8% Drone assessments of transmission infrastructure

Volume vs 2021 Goal: 223 of 2,715 inspections (8%)

Key Actions: Currently scoping additional inspections to complete in Q3/Q4.

SDG&E completed its initial pilot effort, which included flights and assessments of 223 transmission structures in Q1/Q2 of 2021. The low issue rate of 1.5%, along with its other fire-hardening Projects currently underway have resulted in SDG&E lowering the target for transmission flights in 2021 to approximately 1,200 structures (including the 223 flights already completed). The additional structure were selected through a collaborative review with multiple departments including our transmission construction maintenance group, wildfire safety, and transmission engineering to perform flights and assessments of higher risk assets (e.g. older structures in high wind areas or areas subject to PSPS events).

As discussed in the Q1 report, SDG&E may continue to refine this scope to reduce overlap with other efforts, such as fire-hardening or other inspections, so as to reduce cost and provide value to the ratepayers, while focusing on enhancing our wildfire safety work.

ATTACHMENT D



San Diego Gas & Electric CPUC & OEIS Safety Briefing

Erbin Keith
Chair of SDG&E Safety Committee

Kevin Geraghty
SVP, Electric Operations and Chief Safety Officer

August 25, 2021



SDG&E's Safety Committee

- Purpose: “advise and assist the Company’s board of directors in the oversight of safely providing electric and natural gas service to the Company’s customers.”
- Members:
 - Erbin Keith (Chair), Deputy General Counsel, Sempra Energy
 - Rob Borthwick, Deputy General Counsel, Sempra Energy
 - Caroline Winn, Chief Executive Officer, SDG&E
- The Committee has held 9 meetings and has issued 19 safety recommendations to the Company.



Safety Committee Oversight

- Key Oversight Themes:
 - Wildfire Prevention and Mitigation
 - Safety Incidents – Lessons Learned
 - Stakeholder Input
 - Safety of the Workforce and Public
 - Audits
 - Executive Compensation



Key Priorities and Efforts

- Safety Management System(s)
- Leading Indicators
- Wildfire Situational Awareness
- Community Collaboration - WSCAC
- Electric System Hardening
- Gas system integrity and response time



Safety Outcomes and Goals

- SDG&E Safety Performance
- Contractor Safety Performance
- Gas System Safety
- Fire Risk Events
- Emergency Management Excellence



Challenges and Actions

- Workforce Renewal
- COVID
- Hardening Projects
- Resources



Safety Culture Assessment

- National Safety Council 2020 Assessment
- Target Zero
- Psychological Safety
- Human Factors
- Risk-based Planning and Execution