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September 9, 2022

VIA EMAIL AND ELECTRONIC FILING
OEIS Docket No. 2022-SCs

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

**Re: San Diego Gas & Electric Company's Request for a 2022 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 safety certification for the upcoming twelve months.

The Office of Energy Infrastructure Safety (Energy Safety) approved SDG&E's 2021 Safety Certification Request on December 6, 2021.¹ 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 requires that Energy Safety "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 August 25, 2022, Energy Safety issued its Final 2022 Safety Certification Guidance (2022 Safety Certification Guidance) establishing the process by

¹ Letter from WSD Director Caroline Thomas Jacobs to Dan Skopec, *Office of Energy Infrastructure Safety Issuance of San Diego Gas & Electric Company's Safety Certification*, December 6, 2021 ("2021 Safety Certification Approval"). Available at <https://efiling.energy-safety.ca.gov/Search.aspx?docket=2021-SCs>.

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."

which electrical corporations could request a safety certification for the upcoming year.³ Consistent with the 2022 Safety Certification Guidance, this letter, the references cited, and the 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 2022.⁴ On June 11, 2020, the California Public Utilities Commission (Commission) ratified Resolutions WSD-002 (Guidance Resolution) and WSD-005 (SDG&E Resolution). In WSD-005, the Commission approved SDG&E's WMP and obliged SDG&E to meet several additional conditions in subsequent filings. On the basis of this approval, the Commission's Wildfire Safety Division (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."⁵

Pursuant to Public Utilities Code §8386(a) and Energy Safety's Final 2022 Wildfire Mitigation Plan Update Guidelines, SDG&E submitted its Annual Wildfire Mitigation Plan Update on February 11, 2022.⁶ On July 5, 2022, Energy Safety published its Final Decision approving SDG&E's 2022 WMP Update.⁷ On August 25, 2022, the Commission issued Resolution SPD-1, ratifying Energy Safety's approval of SDG&E's 2022 Wildfire Mitigation Plan Update pursuant to Public Utilities Code Section 8386.⁸

³ *Office of Energy Infrastructure Safety's Safety Certification Guidelines* (August 25, 2022), OEIS Docket No 2022-SCs.

⁴ SDG&E 2020 Wildfire Mitigation Plan. Available at https://www.sdge.com/sites/default/files/regulatory/SDG%26E%202020%20Wildfire%20Mitigation%20Plan%2002-07-2020_0.pdf.

⁵ *Wildfire Safety Division Approval of San Diego Gas & Electric Company's 2020 Safety Certification Request*, California Public Utilities Commission (September 14, 2020) at 2-3. Available at <https://energysafety.ca.gov/wp-content/uploads/docs/safety-certificates/wsd-to-sdge-safety-certificate-20200914.pdf>.

⁶ SDG&E 2022 Wildfire Mitigation Plan Update (February 11, 2022). Available at <https://www.sdge.com/sites/default/files/regulatory/SDG%26E%202022%20WMP%20Update%2002-11-2022.pdf>.

⁷ *Decision on SDG&E's 2022 Wildfire Mitigation Plan Update*, OEIS Docket No. 2022-WMPs (July 5, 2022). Available at www.energysafety.ca.gov.

⁸ Resolution SPD-1, California Public Utilities Commission (August 25, 2022). Available at <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M496/K639/496639610.pdf>.

SDG&E's approved three-year Wildfire Mitigation Plan and its approved 2022 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 2022 Safety Certification Guidance established that “an electrical corporation can satisfy the ‘good standing’ requirement of 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.”⁹ On September 2, 2021, Energy Safety publicly served the final 2021 Safety Culture Assessment Report, prepared by DEKRA, along with the recommendations of the Assessment.¹⁰ On September 3, 2021, SDG&E responded to Energy Safety agreeing to implement the recommendations of the Safety Culture Assessment.¹¹ SDG&E has thus satisfied the requirement that it is in “good standing” pursuant to Public Utilities Code Section 8389(e)(2).¹²

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

The 2022 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 respective 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 2022 include:

Robert J. Borthwick: Mr. Borthwick is the Deputy General Counsel for Sempra Energy. His relevant safety experience includes 17 years

⁹ 2022 Safety Certification Guidance at 4.

¹⁰ *Office of Energy Infrastructure Safety Issuance of San Diego Gas & Electric Company's 2021 Safety Culture Assessment per Public Utilities Code Section 8389(d)(4)*, OEIS Docket No. 2021-SCAs (September 2, 2021).

¹¹ *Office of Energy Infrastructure Safety Issuance of San Diego Gas & Electric Company's 2021 Safety Culture Assessment per Public Utilities Code Sections 8389(d)(4)*. OEIS Docket No. 2021-SCAs (September 2, 2021).

¹² The 2022 Safety Culture Assessment, administered by the National Safety Council, is currently underway. At this time, it is not clear whether the 2022 Safety Culture Assessment will be complete within the 90-day timeframe for a determination on SDG&E's safety certification. Regardless of the completion of the 2022 Safety Culture Assessment, by agreeing to implement the recommendations of its “*most recent*” Safety Culture Assessment, SDG&E has already satisfied the “good standing” requirement of Public Utilities Code §8389(e)(2).

working in the energy industry. 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 is the Chief Executive Officer of SDG&E. She has more than 30 years of experience of operational leadership experience. Ms. Winn 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: Mr. Keith is the Deputy General Counsel for Sempra Energy. 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 a 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. Consistent with the 2022 Safety Certification Guidance, SDG&E has included detailed biographies of its Safety Committee members highlighting their relevant safety expertise and experience.¹³

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 ("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 Company's Board of Directors. As set forth in the Safety Committee Charter, those powers and responsibilities include overseeing SDG&E's management of safety matters that affect the Company, including employees, contractors, customers, and the communities in which the Company operates. The Safety Committee also reviews the Company's incentive compensation structure related to safety and the Company's performance with respect to safety metrics. Currently, three of the four members of SDG&E's Board of Directors serve on the Safety Committee.

¹³ See Attachment A.

c. Significant Topics Covered by the Safety Committee Since the Issuance of the Last Safety Certification

SDG&E's quarterly Board Safety Committee meetings include thoughtful and robust discussion of safety issues affecting the Company, including ongoing community and wildfire safety efforts. At each meeting, the Committee receives an update on the Company's safety performance metrics to date, including both safety incidents as well as "near miss" reports. These meetings are summarized and reported to Energy Safety and the Commission in SDG&E's Quarterly Notification Letters documenting the ongoing implementation of SDG&E's Wildfire Mitigation Plan pursuant to Public Utilities Code Section 8389(e)(7).¹⁴

The 2022 Safety Certification Guidance further requires SDG&E to provide a description of significant topics covered by the Safety Committee since the issuance of the last Safety Certification. Since SDG&E's last safety certification was granted, the Board Safety Committee has considered and recommended the following topics of significance:

- On March 2, 2022, the Committee heard presentations on the Company's cybersafety and cybersecurity enhancements, as well as efforts to respond to potential cyber threats in light of the situation in the Ukraine; a summary of the Company's 2021 WMP results and accomplishments; the progress of SDG&E's PSPS mitigation programs; and the development and enhancement of the Company's Access and Functional Needs (AFN) support programs, including additional support for AFN customers during PSPS events.¹⁵
- On April 26, 2022, the Committee heard presentations on the ongoing Safety Culture OII for SoCal Gas and Sempra Energy, the findings and recommendations of the Commission's consultant, 2EC, and any actions taken by SDG&E upon analysis of the recommendations; changes to the Gas Transmission Safety Rule and target dates for implementation; and SDG&E's

¹⁴ 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/2022-wildfire-mitigation-plan>.

¹⁵ For additional information, see *SDG&E's May 2, 2022 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)* (May 2, 2022 Quarterly Notification Letter). Available at <https://www.sdge.com/sites/default/files/regulatory/Quarterly%20Notification%20Letter%2005-02-22.pdf>.

efforts to achieve Voluntary Protection Program (VPP) status at the Company's Kearny facility.¹⁶

- On July 20, 2022, the Committee heard presentations on SDG&E's new Telematics system on fleet vehicles and efforts to promote safe driving; an update on the upcoming peak wildfire season for 2022 and the ongoing drought throughout California; the implementation of SDG&E's technology enhancements in fire science and behavior modeling, including improvements to model fire heat impacts on weather and the Company's use of air quality index sensors and AI smoke detection cameras, and enhancements to PSPS outreach tools in 2022; and the Company's Serious Injury and Fatality (SIF) program.¹⁷

d. SDG&E's Implementation of the Recommendations of the Board Safety Committee Since the Issuance of the Last Safety Certification

The Board Safety Committee's recommendations to SDG&E are summarized in SDG&E's Quarterly Notification Letters submitted to Energy Safety and the Commission pursuant to Public Utilities Code Section 8389(e)(7). SDG&E has taken the following actions in response to feedback from the Board Safety Committee since the issuance of the last Safety Certification:

- On November 2, 2021, the Board Safety Committee recommended that SDG&E provide presentations on the status of Dura-Line plastic pipe and SDG&E's enhanced vegetation management program. At the March 2, 2022 Safety Committee Meeting, SDG&E received a presentation from Oliva Reyes, SDG&E Director of Construction Management, highlighting the accomplishments of SDG&E's vegetation management program in 2021 and noted that the company continues to have one of the strongest programs in the state. At the July 20, 2022 meeting, SDG&E received an update on the Company's analysis of Dura-Line plastic pipe.
- At the March 2, 2022, Board Safety Committee meeting, the Committee recommended that SDG&E should make presentations on the CPUC's informational workshop on the 2EC Safety Culture Assessment Report of SoCalGas and Sempra in the SoCalGas Safety Culture OII, and lessons learned on the applicability of 2EC's overarching themes to SDG&E. In

¹⁶ For additional information, see *SDG&E's August 1, 2022 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)* (August 1, 2022 Quarterly Notification Letter). Available at <https://www.sdge.com/sites/default/files/regulatory/Quarterly%20Notification%20Letter%2008-01-22.pdf>.

¹⁷ *Id.*

response to this recommendation, SDG&E performed a gap analysis to identify potential areas for enhancement in response to the 2EC recommendations and provided a report to the Board Safety Committee at the April 26, 2022 Committee meeting. The committee also directed SDG&E to retain a compensation consultant to advise the Committee on safety aspects of compensation, particularly SDG&E's Incentive Compensation Plan. SDG&E is in the process of seeking and retaining such a consultant and expects the consultant will be in place prior to the development of its 2023 Incentive Compensation Plan metrics.

As discussed above, 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 Energy Safety's guidance regarding the 2022 executive compensation approvals, on March 14, 2022, SDG&E submitted a letter to Energy Safety documenting its compliance with the executive compensation provisions of Public Utilities Code Sections 8389(e)(4) and (e)(6). No comments were submitted to SDG&E's executive incentive compensation structure.

On July 28, 2022, Energy Safety issued a letter approving SDG&E's 2022 executive compensation structure, finding that SDG&E's executive compensation met the requirements of Public Utilities Code Sections 8389(e)(4) and 8389(e)(6)(A)(i).¹⁸ 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)

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.

¹⁸ *Office of Energy Infrastructure Safety Approval of San Diego Gas & Electric Company's 2022 Executive Compensation Structure Pursuant to Public Utilities Code Sections 8389(e)(4) and 2022 Executive Compensation Structure Submission Guidelines*, OEIS Docket No. 2022-ECs (July 28, 2022).

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.

The Commission and Energy Safety recently announced that they will jointly hold a public meeting at which the Commission will hear presentations from representatives of the electrical corporations' boards, along with Company safety representatives. SDG&E is scheduled to provide its presentation and answer questions on September 22, 2022. Among other things, SDG&E's presentation will brief the Commission and Energy Safety on the Company's safety performance, the oversight of the Board Safety Committee, incentive compensation issues related to safety, and the ongoing implementation of SDG&E's wildfire safety efforts. As directed in the 2022 Safety Certification Guidance, SDG&E will make available the materials used in the September 22 public meeting to Energy Safety when they are finalized.¹⁹

Further, and as discussed herein, SDG&E has submitted reports to Energy Safety and the Commission regarding consideration of safety issues by its Board Safety Committee via the Quarterly Notification Letters submitted pursuant to Public Utilities Code Section 8389(e)(7).

Consistent with the 2021 Safety Certification Guidance, SDG&E has met the requirements of 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.

¹⁹ Pursuant to the 2022 Safety Certification Guidelines, Energy Safety has instructed the electrical corporations to submit any missing elements that remain pending at the time of the Safety Certification request "as soon as they are available." (See, Safety Certification Guidance at 6). When the Board Safety Presentation is finalized and public, SDG&E will post the presentation to its website, <https://www.sdge.com/2022-wildfire-mitigation-plan>. Public Utilities Code Section 8389(e)(5) does not specifically require SDG&E to attach any materials included in the board-level presentations to the Committee in order to receive a safety certification, and as such, with this filing, SDG&E submits that it has provided all the documentation to begin the 90-day timeline for assessment of its safety certification as of the date of this submission.

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 Notification Letters to Energy Safety as required by Public Utilities Code Section 8389(e)(7).²⁰ These include:

SDG&E Quarterly Notification Letter (February 1, 2022);²¹

SDG&E Quarterly Notification Letter (May 2, 2022);²²

SDG&E Quarterly Notification Letter (August 1, 2022).²³

Each submission complies with statutory requirements because it (1) details the implementation of its approved wildfire mitigation plan and most recent safety culture assessment; (2) contains a statement of the recommendations of the Board of Directors' Safety Committee meetings that occurred during the quarter; and (3) summarizes the Company's implementation of the Safety Committee's recommendations.

The 2022 Safety Certification Guidance also requires that the electrical corporation demonstrate "meaningful progress in implementing [the] WMP" to receive a safety certification.²⁴ The Guidance further defines "meaningful progress" as a requirement that the electrical corporation is "progressing toward the targets set forth in its WMP."²⁵ SDG&E's detailed quarterly submissions demonstrate that it is making on-time and on-target progress toward its WMP targets. SDG&E continues to track 41 quantitative metrics and 29 qualitative metrics on 69 different mitigations proposed in its 2022 Wildfire Mitigation Plan Update.

SDG&E continues to make meaningful progress toward completing its WMP initiatives and enhancing the safety and resiliency of its service territory. As demonstrated in its August 1, 2022, notification to Energy Safety, SDG&E is on-track or ahead-of-track for all but three of its targets: microgrids, installation of system

²⁰ 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.

²¹ The Quarterly Notification Letters are available for review on SDG&E's website, at <https://www.sdge.com/sites/default/files/regulatory/02012022%20SDGE%20Quarterly%20Notification%20to%20OEIS%20re%20WMP%20Implementation%20Plan.pdf>.

²² May 2, 2022 Quarterly Notification Letter, *supra*.

²³ August 1, 2022 Quarterly Notification Letter, *supra*.

²⁴ 2021 Safety Certification Guidance at Section 2.2, p.3.

²⁵ *Id.*

automation equipment (Advanced Protection), and generator grant programs.²⁶ SDG&E is rescoping the generator grant programs to take advantage of new battery technology aimed at improving sustainability and reliability. Microgrids are being converted from traditional power generation to renewable power sources and two sites are expected to be delayed until 2023. SDG&E will still meet the risk reduction intent of these initiatives as the customers will have PSPS mitigated from the traditional generation. Permitting delays are impacting SDG&E's Advanced Protection Program and the project team continues to work to complete the forecasted projects in 2022.

SDG&E also notes that the recent Independent Evaluator Report addressing SDG&E's compliance with its 2021 WMP initiatives, completed July 15, 2022, also documented that "the IE finds SDG&E's approach to QA/QC, commitment to safety, and innovative approach to wildfire mitigation forthcoming progressive and encouraging."²⁷ SDG&E thus meets Energy Safety's requirement to demonstrate meaningful progress toward the targets set forth in its WMP, and has established that it has met the statutory requirement of Public Utilities Code Section 8389(e)(7).

Consistent with Public Utilities Code Section 8389(e)(7), SDG&E's Quarterly Notification Letters to Energy Safety also update stakeholders regarding the Company's implementation of the recommendations of its most recent safety culture assessment.²⁸ Safety, including but not limited to wildfire safety, remains one of SDG&E's top priorities. And SDG&E is continually working to promote innovation and enhancement in its safety culture. To highlight its efforts to implement the recommendations of its most recent safety culture assessment, to date, SDG&E has performed the following:

Recommendation: Integrate safe behaviors associated with mitigating hazards from wildfires and hostile interactions with discontented members of the public into the Behavior-Based Safety (BBS) observation program.

- Communication & Awareness
 - SDG&E safety advisors hosted operational and manager training & focused meetings.
 - SDG&E facilitated company-wide psychological safety town halls & District safety all-hands meetings.
- Engagement
 - Chief Safety Officer and District leadership performed on-site safety visits.

²⁶ See August 1, 2022 Quarterly Notification Letter, *supra*. The August 1, 2022 Quarterly Notification Letter also includes additional information regarding the progress of SDG&E's drone inspections and SDG&E's planned microgrids.

²⁷ *Final Independent Evaluator Report on Compliance for SDG&E*, 4LEAF, Inc., AerialZeus LLC, MM& Company (June 30, 2022). OEIS Docket No. 2022-IE.

²⁸ SDG&E's Quarterly Notification Letters are available at <https://www.sdge.com/2022-wildfire-mitigation-plan>.

- Executive Safety Council (ESC) sought and collected feedback from front-line operational employees and supervision.
- Process & Technology
 - Developed new BBS process for electric distribution system operators to identify safe and at-risk behaviors associated with mitigating hazards from wildfires.
 - Expanding BBS checklist accordingly and enhancing near miss reporting application.
 - Enhanced Near Miss Reporting application to include additional risks related to wildfires and hostile interactions with discontented members of the public to allow for increased reporting and data analytics.

Recommendation: Clarify, coach, and track the behaviors field leadership needs to adopt to advance the safety culture.

- SDG&E hosted Company-wide manager training workshops to promote a culture of safety and trust.
- SDG&E adopted a 2022 Safety Management Action Plan which establishes measurable metrics towards SDG&E's stated goal of "Increased Leadership Safety Engagement: Meaningful safety-focused employee interactions with increased field visits, two-way communication, feedback, and follow-up."
- Increased leadership safety observations and visits. SDG&E is currently on track for its best-ever year in number of safety observations performed.
- SDG&E launched a "Start Strong" campaign at the beginning of 2022, where District leadership hosted safety all-hands meetings/summits to set and clarify safety expectations.
- SDG&E launched a company-wide Supervisor Training Academy for frontline leaders, which covers safety, supervisor effectiveness, diversity and inclusion, compliance, employee engagement and culture.

Recommendation: Recognize and take action to mitigate the serious exposure posed by interactions with certain discontented members of the public.

- Delivered social media communications, including illustrative videos, across various platforms raising greater awareness and reminding members of the public that SDG&E employees may be on their property performing work to maintain safety and reliability.
- Heightened company-wide focus and attention around hostile interactions with discontented members of the public resulting from bill increases and media attention.
- Company and operational leadership provided all employees with talking points and safety tips for customer interactions and communications around safely interacting with members of the public.

Caroline Thomas Jacobs
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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

ATTACHMENT A

SDG&E Board Safety Committee Resumes

Erbin B. Keith-Safety Resume

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 Resume

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 also 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. In 2021, 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 and continues to improve the means for employees to proactively speak up regarding safety issues.

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 Resume

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.