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September 8, 2023

**ELECTRONIC FILING  
OEIS Docket No. 2023-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 2023 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 2022 Safety Certification Request on December 8, 2022.<sup>1</sup> To ensure alignment with the annual safety certification cadence and Energy Safety workstreams, "an electrical corporation must submit to Energy Safety a request for a safety certification for the following 12 months 90 days prior to the expiration of a certification."<sup>2</sup> Public Utilities Code Section 8389(f)(2) requires that Energy Safety "shall issue a certification within 90

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<sup>1</sup> Letter from Office of Energy Infrastructure Safety Director Caroline Thomas Jacobs to Dan Skopec, *Office of Energy Infrastructure Safety Issuance of San Diego Gas & Electric Company's Safety Certification*, December 8, 2022 ("2022 Safety Certification Approval"). Available at <https://efiling.energysafety.ca.gov/Search.aspx?docket=2022-SCs>

<sup>2</sup> *Office of Energy Infrastructure Safety's Safety Certification Guidelines* (Safety Certification Guidelines) (June 28, 2023) at 1, OEIS Docket No 2023-SCs, *citing* Pub. Util. Code §8389(f)(2).

days of a request if the electrical corporation has provided documentation that it has satisfied the requirements of subdivision (e)” of Section 8389.<sup>3</sup>

On June 28, 2023, Energy Safety issued its Final 2023 Safety Certification Guidelines (2023 Safety Certification Guidelines) establishing the process by which electrical corporations could request a safety certification for the upcoming year.<sup>4</sup> Consistent with the 2023 Safety Certification Guidelines, 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. Where applicable, SDG&E has noted the status of certain safety certifications still in the process of approval by Energy Safety.<sup>5</sup> As all of SDG&E’s safety certification requirements are complete or have received an initial draft approval, SDG&E believes it will soon complete all safety certification requirements and will update this request upon receiving Energy Safety’s final approval of any necessary elements.<sup>6</sup>

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

On June 11, 2020, the California Public Utilities Commission (Commission) approved SDG&E’s 2020-2022 Wildfire Mitigation Plan (WMP).<sup>7</sup> 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.<sup>8</sup> On July 5, 2022, Energy Safety published its Final Decision approving SDG&E’s 2022 WMP Update.<sup>9</sup> On August 25, 2022, the Commission issued Resolution

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<sup>3</sup> 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.”

<sup>4</sup> *Safety Certification Guidelines*, OEIS Docket No 2023-SCs.

<sup>5</sup> *Id.* at 6.

<sup>6</sup> *Id.*

<sup>7</sup> In WSD-005, the Commission approved SDG&E’s WMP and obliged SDG&E to meet several additional conditions in subsequent filings. Based on 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.” *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>.

<sup>8</sup> 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>.

<sup>9</sup> *Decision on SDG&E’s 2022 Wildfire Mitigation Plan Update*, OEIS Docket No. 2022-WMPs (July 5, 2022). Available at [www.energysafety.ca.gov](http://www.energysafety.ca.gov).

SPD-1, ratifying Energy Safety's approval of SDG&E's 2022 Wildfire Mitigation Plan Update pursuant to Public Utilities Code Section 8386.<sup>10</sup>

On March 27, 2023, SDG&E submitted its Wildfire Mitigation Plan (WMP) covering the years 2023 through 2025.<sup>11</sup> On August 30, 2023, Energy Safety issued a Draft Decision approving SDG&E's 2023-2025 WMP, noting, "SDG&E has a relatively strong Wildfire Mitigation Plan compared to the plans of the other large electrical corporations. SDG&E knows its wildfire risk and is focused on the highest risk circuits in its system."<sup>12</sup> Based on this generally positive assessment of SDG&E's 2023-2025 WMP, SDG&E submits that its WMP will receive final approval in short order and will update its Safety Certification request at that time.

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

The 2023 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."<sup>13</sup> On May 8, 2023, Energy Safety publicly served the final 2022 Safety Culture Assessment Report, prepared by the National Safety Council, along with the recommendations of the Assessment.<sup>14</sup>

On June 15, 2023, SDG&E responded to Energy Safety agreeing to implement the recommendations of the Safety Culture Assessment.<sup>15</sup> SDG&E has thus satisfied the requirement that it is in "good standing" pursuant to Public Utilities Code Section 8389(e)(2).<sup>16</sup>

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<sup>10</sup> Resolution SPD-1, California Public Utilities Commission (August 25, 2022). Available at <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M496/K639/496639610.pdf>.

<sup>11</sup> SDG&E 2023 Wildfire Mitigation Plan. Available at <https://www.sdge.com/2023-wildfire-mitigation-plan>

<sup>12</sup> *Draft Decision on San Diego Gas & Electric Company's 2023-2025 WMP* (August 30, 2023) at 1. OEIS Docket No. 2023-WMPs.

<sup>13</sup> 2023 Safety Certification Guidelines at 2.

<sup>14</sup> *Office of Energy Infrastructure Safety Issuance of San Diego Gas & Electric Company's 2022 Safety Culture Assessment per Public Utilities Code Section 8389(d)(4)*, OEIS Docket No. 2022-SCAs (May 8, 2023).

<sup>15</sup> *Agreement of San Diego Gas & Electric to Implement the Findings of the 2022 Safety Culture Assessment Report*. OEIS Docket No. 2022-SCAs (June 15, 2023).

<sup>16</sup> The 2023 Safety Culture Assessment, administered by the National Safety Council, is currently underway. Regardless of the timeframe for completion of the 2023 Safety Culture Assessment, by agreeing to implement the recommendations of its "most recent" Safety Culture

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

The 2023 Safety Certification Guidelines 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 2023 include:

Robert J. Borthwick: Mr. Borthwick is the Chief Risk Officer for Sempra Energy. His relevant safety experience includes 20 years 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.

Karen Sedgwick: Ms. Sedgwick is the Chief Administrative Officer and Chief Human Resources Officer of Sempra Energy. She is responsible for developing and executing human resource strategy, organizational effectiveness, staffing, and benefits. Ms. Sedgwick has more than 30 years' experience and has held several senior human resources and operational roles at SDG&E and Sempra in the past, including oversight of Sempra's Audit Services and Enterprise Risk Management operations.

Mr. Borthwick has served on the SDG&E Board Safety Committee since 2019. Ms. Winn joined the Safety Committee in 2021. Ms. Sedgwick joined the Safety Committee in 2022. Consistent with the 2023 Safety Certification Guidance, SDG&E has included

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Assessment, SDG&E has already satisfied the "good standing" requirement of Public Utilities Code §8389(e)(2). SDG&E notes that it has not yet participated in a safety culture assessment carried out pursuant to Public Utilities Code §8386.2. See Safety Certification Guidelines at 2.

detailed biographies of its Safety Committee members highlighting their relevant safety expertise and experience.<sup>17</sup>

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, its 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. The Safety Committee regularly updates the SDG&E Board of Directors on safety matters addressed by the Committee and the Committee’s recommendations to the Company.

*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).<sup>18</sup>

The 2023 Safety Certification Guidance further requires SDG&E to provide a description of significant topics covered by the Safety Committee since the issuance of

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<sup>17</sup> See Attachment A. These biographies also note “safety-related education and experience for each safety committee member that is relevant to their role at the electrical corporation.” (Safety Certification Guidelines at 3).

<sup>18</sup> SDG&E’s most recent quarterly notification to Energy Safety describing the actions and recommendations of the Board Safety Committee, 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/2023-wildfire-mitigation-plan>.

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 November 8, 2022,<sup>19</sup> the Committee heard presentations on the implementation of, and updates to, SDG&E's Safety Management System (SMS) and the use of data in developing updated safety performance metrics. SDG&E also incorporated the SMS into its risk-based decision making and the adoption of SDG&E's first annual Safety Management Action Plan in 2022. During this meeting, the Committee also received an update on the safety metrics included in SDG&E's incentive compensation structure.
- On February 23, 2023, the Committee heard presentations on SDG&E's 2023 Wildfire Mitigation Plan submission and the Company's vegetation management efforts. During this meeting, the Committee also heard an update on the achievements of SDG&E's Damage Prevention Program, which protects underground gas, electric, and fiber optic infrastructure and promotes safety and reliability. Additionally, a representative of Sempra Infrastructure presented on a recent safety incident at a Sempra Infrastructure facility resulting in a contractor fatality, and the implementation of lessons learned.
- On April 26, 2023, the Committee received a presentation on SDG&E's efforts to enhance community safety through continuous innovation. This included a presentation on the use of analytics and technology to build situational awareness and provide a real-time picture of system conditions, which can aid in risk-based decision making.
- On July 14, 2023, the Safety Committee performed a site visit to observe SDG&E's vegetation management contractors perform tree trimming to mitigate wildfire risk.
- On July 18, 2023, the Committee received an update on vehicle safety incidents and discussed a recent motor vehicle incident impacting Sempra Infrastructure. The Committee also received a presentation on the recent Envista Root Causes Analysis of the 2017 and 2018 PG&E wildfires, and the applicability of any lessons learned to SDG&E. Finally, the Committee heard a presentation addressing enhancements to SDG&E's contractor safety programs and the efforts of SDG&E's Safety Management Department to classify and grade contractors based on performance and safety culture.

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<sup>19</sup> This meeting occurred after SDG&E's previous request for a safety certification but before it was granted in December 2023. SDG&E includes it in this submission for thoroughness.

*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). Committee recommendations and the actions SDG&E has taken in response to feedback from the Board Safety Committee since the issuance of the last Safety Certification include the following:

Recommendation	Status
Prepare a Report on the Envista Root Cause Analysis of the 2017-2018 PG&E Wildfires and the applicability of any lessons learned to SDG&E.	Complete
Present on the Company’s contractor safety management processes	Complete
Present on any recent safety audits	Complete
Schedule a vegetation management site visit to oversee safety practices	Complete
Report on inspections of legacy gas transmission lines, and the Company’s programs to address public safety during gas incidents	Pending; this recommendation was made at the most recent Safety Committee meeting and is expected to be completed before the end of 2023.
Report on the Company’s internal wildfire challenge sessions and any actions taken by the Company in response to prepare for the fall Santa Ana season.	Pending; this recommendation was made at the most recent Safety Committee meeting and is expected to be completed before the end of 2023.

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)**

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).<sup>20</sup>

On March 13, 2023, 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). On August 8, 2023, Energy Safety issued a Draft Decision approving SDG&E's 2023 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).<sup>21</sup> SDG&E expects to receive final approval of its executive compensation structure prior to December, and will update this safety certification request at that time.

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

On July 20, 2023, the Commission hosted a Public Meeting on Utility Safety Practices, during which representatives from SDG&E and Southern California Edison presented on safety matters and answered questions from Commissioners and the Director of Energy Safety.<sup>22</sup> SDG&E was represented by Robert Borthwick, Chief Risk Officer at Sempra Energy and Chair of the SDG&E Board Safety Committee, Kevin Geraghty, SDG&E Chief Operating Officer and Chief Safety Officer, Brian D'Agostino, SDG&E Vice President, Wildfire Mitigation and Climate Science, and Jonathan Woldemariam, SDG&E Director of Wildfire Mitigation.

Consistent with the 2023 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)**

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<sup>20</sup> *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).

<sup>21</sup> *Office of Energy Infrastructure Safety Draft Approval of San Diego Gas and Electric Company's 2023 Executive Compensation Structure Pursuant to Public Utilities Code Section 8389(e)(4) and 8389(e)(6), and 2023 Executive Compensation Structure Submission Guidelines*, OEIS Docket No. 2023-ECs (August 8, 2023).

<sup>22</sup> Pursuant to the 2023 Safety Certification Guidelines, Energy Safety has instructed electrical corporations to provide any materials used or referenced in the public meeting in their Safety Certification requests to demonstrate that the electrical corporation has met this requirement. SDG&E's presentation is available on its website at <https://www.sdge.com/2023-wildfire-mitigation-plan>. The recording of the public meeting is also available on the Commission's website at <https://www.adminmonitor.com/ca/cpuc/hearing/20230720/>.



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 Notification Letters to Energy Safety as required by Public Utilities Code Section 8389(e)(7).<sup>23</sup> These include:

SDG&E Quarterly Notification Letter (February 1, 2023);<sup>24</sup>

SDG&E Quarterly Notification Letter (May 1, 2023);<sup>25</sup>

SDG&E Quarterly Notification Letter (August 1, 2023).<sup>26</sup>

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.

*Implementation of SDG&E's WMP*

The 2023 Safety Certification Guidance also requires that the electrical corporation "highlight the progress made toward completing WMP targets and explain any delayed or off-track efforts."<sup>27</sup> SDG&E's detailed quarterly submissions demonstrate that it is making on-time and on-target progress toward the majority of its WMP targets. SDG&E continues to track 39 quantitative targets proposed in its 2023-2025 WMP, which are designed to mitigate the risk due to a fault on the electric system and reduce the impacts of PSPS to customers.

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, 2023, notification to Energy Safety, SDG&E is on-track or

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<sup>23</sup> 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.

<sup>24</sup> The Quarterly Notification Letters are available for review on SDG&E's website, at <https://www.sdge.com/2022-wildfire-mitigation-plan> and <https://www.sdge.com/2023-wildfire-mitigation-plan>.

<sup>25</sup> May 1, 2023 Quarterly Notification Letter, *supra*.

<sup>26</sup> August 1, 2023 Quarterly Notification Letter, *supra*.

<sup>27</sup> 2023 Safety Certification Guidance at 4.

ahead-of-track for all targets except for strategic undergrounding. Bad weather and difficulties in easement acquisition have delayed construction of certain strategic undergrounding projects. SDG&E forecasts that, beyond its current mileage, SDG&E will complete another 50-70 miles of construction by the end of 2023.

SDG&E also notes that the recent Independent Evaluator Report addressing SDG&E's compliance with its 2022 WMP initiatives, completed July 25, 2023, also documented that "SDG&E has completed and has ongoing operations for the WMP programs outlined in the SDG&E approved 2022 WMP."<sup>28</sup> 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).

### Implementation of Safety Culture Assessment Recommendations

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.<sup>29</sup> SDG&E notes that it agreed to implement its most recent Safety Culture Assessment recommendations in June of 2023, and the following represents less than three months of implementation to date. Progress on these recommendations is continuing and SDG&E will provide continued updates in its Quarterly Notification Letters to Energy Safety.

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: SDG&E should continue to develop and implement actions to reduce barriers to prioritizing safety over job task goals. Leadership should consistently demonstrate to workers that safety is the top priority through communication, decision making, and taking action, especially when there is a short deadline or pressures to re-energize to reduce the customer impact of outages.*

- During Q2 2023, SDG&E's senior executive team visited 13 sites to connect in-person with and solicit feedback from hundreds of employees across SDG&E's districts.
- SDG&E executives regularly communicate to employees. For example, on May 18, 2023, SDG&E hosted a Quarterly Business Update provided by senior

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<sup>28</sup> *Final Independent Evaluator Report on Compliance for SDG&E*, Bureau Veritas North America, Inc. (June 30, 2023). OEIS Docket No. 2023-IE.

<sup>29</sup> SDG&E's Quarterly Notification Letters are available at <https://www.sdge.com/2022-wildfire-mitigation-plan> and <https://www.sdge.com/2023-wildfire-mitigation-plan>.

executive leadership, including SDG&E's CEO. The Update included an address of key safety updates and was attended by over 750 employees in a hybrid fashion of in-person and virtual. A Q3 Update was held on August 30, 2023. Additionally, SDG&E's Chief Safety Officer and rotating Executive Officers issue weekly safety messages to all employees via e-mail.

- On July 18, 2023, SDG&E held an Executive Safety Council meeting where representatives of company-wide employee safety committees were asked to discuss initiatives, successes, and challenges directly with SDG&E Executive Leadership.
- During recent planning, management, and restoration efforts during Tropical Storm Hilary, (August 17 – 22, 2023), SDG&E leadership continually communicated clear expectations that safety remained the top priority and demonstrated that commitment through action and decision-making. Following the storm, leaders sent communications thanking employees for their efforts and reemphasizing the importance of allowing time to “recover” mentally and physically.
- On September 1, 2023, SDG&E held its annual Safety Congress and Leadership Award Ceremony. This event recognizes SDG&E's numerous Safety Committees for their efforts to advance safety throughout the year. SDG&E leadership provided remarks highlighting the company's unwavering safety commitment and presented an individual and team safety award to recognize employees who best exemplify the company's safety vision and values.

*Recommendation: SDG&E should continue to recognize and mitigate the risk exposure posed by interactions with the public. Frontline workers feel supported in walking away from jobs where interactions with the public pose threats to the crew, but the risk remains a significant concern for SDG&E workers.*

- SDG&E leadership continues to emphasize that all employees are empowered to “Stop the Job” if ever an unsafe situation is perceived.
- SDG&E operational teams continue to deploy training and messaging regarding safe interactions with members of the public. SDG&E external communication teams continue to deliver public educational messaging leveraging numerous communication platforms to raise greater awareness and remind members of the public that SDG&E employees may be on their property performing work to maintain safety and reliability.
- SDG&E continues to advance deployment of its Field Service Delivery organization, formed in 2022 to enhance the way the Company conducts field work by optimizing processes, resources, and technology from the point of job intake to execution in the field. The primary objective of the organization is to provide a safe, easy, and modern field service experience for customers and employees.
- SDG&E continues to advance deployment of its Geocall Electric Pre-Construction Mobile Fielding Application launched on Oct. 31, 2022. The Geocall application is a leading-edge technology solution used to coordinate and optimize

end-to-end field service processes, activities, and resources. The application integrates with GIS maps to include customer warning notifications (e.g., aggressive dogs, access codes, hostile persons) and includes opportunity for crews to include prerequisite and post completion notes.

*Recommendation: SDG&E should continue to build on its efforts to track trends in safety event-related reporting, specifically tracking the quality of near-miss investigations and addressing gaps in its Ignition Management Program*

- SDG&E deployed enhancements to its company-wide Safety Dashboard – accessible to all SDG&E employees – to track trends in Near Miss reporting, including tracking of anonymous and non-anonymous submittals as a leading safety culture indicator.
- SDG&E tracks the quality of Near Miss Reports. For example, in 2023 SDG&E has seen an increase in procedural-related and human error-related near misses. SDG&E also shares “switching incidents” in a manner similar to Near Miss reporting. The goal of switching incident reporting is to share preliminary lessons learned with electric operations teams to reduce and eliminate switching incidents in the future.
- Starting in Q2 2023, SDG&E developed and began issuance of a Weekly Near Miss Summary Report. This Report is sent to all SDG&E employees via e-mail on a weekly basis and provides high level data analysis to identify trends and highlights follow-up action items, safety reminders and key teachings. This Weekly Near Miss Summary Report aims to recognize employees for speaking-up and highlight resulting safety improvements to encourage reporting.

SDG&E thus meets Energy Safety’s requirement to demonstrate progress in implementing the findings of its most recent safety cultures assessment, and has established that it has met the statutory requirement of Public Utilities Code Section 8389(e)(7).

Caroline Thomas Jacobs  
September 8, 2023  
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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**

## ***Karen Sedgwick – Safety Resume***

Ms. Sedgwick is currently the Chief Administrative Officer and Chief Human Resource Officer for Sempra Energy. She has served in various capacities at Sempra Energy and its subsidiaries over 30 years. Ms. Sedgwick is a champion of both physical and psychological safety in her roles overseeing human resources, benefits, diversity and inclusion, in addition to physical security, cybersecurity, audit services, insurance and compliance.

### **Selected safety-related responsibilities:**

#### **Chief Admin Officer and Chief Human Resource Officer Sempra Energy (2020-present)**

As CAO and CHRO, Sedgwick is responsible for developing and executing human resource strategy, organizational effectiveness, staffing, benefits, physical security, cyber security, risk management, audit and insurance. Sedgwick also leads the company's diversity efforts focused on inclusion and psychological safety. She is the Chief Ethics Officer and fosters a speak-up culture where employees feel safe to bring up issues and safety concerns without threat of retaliation or intimidation. She brings together leadership across the Sempra family of companies quarterly to discuss top issues and best practices including safety items. These are in-depth reviews of safety incidents or safety best practices that are shared for discussion and learnings that can be brought back to other operating companies.

#### **Chief Admin Officer and Chief Human Resource Officer SDG&E (2019-2020)**

Sedgwick's role leading Human Resources at SDG&E included leading the Employee Safety and Wellness Departments. In this role, Sedgwick led the safety summit and safety training offerings. She was responsible for reviewing the contractor safety metrics and deciding disciplinary actions where necessary. She led the company response to Covid 19 with safety as the top priority.

#### **Sempra Energy 2014-2018 VP Audit Services**

Sedgwick led the Sempra Energy Audit services group that oversaw audits across all of the Sempra Energy operating companies. In this role she reported directly to the Sempra Board Audit Committee and shared findings and learnings from audits with the boards at the operating companies. This work included leading environmental and safety audits at the utilities and proposing corrective safety actions and enhancements.

#### **Sempra Energy 2012-2014 Settlement Officer and Director Risk Management**

As the head of risk management, Sedgwick led the formation of the risk registry and led the procurement of insurance products, including wildfire insurance. She also worked extensively on San Diego Gas & Electric's litigation arising out of three 2007 wildfires, specifically the Witch, Guejito, and Rice fires. She also worked closely with the wildfire

prevention and weather teams to communicate fire prevention and safety best practices.

### **SDG&E Director Supply Management 2010-2012**

As Director of Supply Management, Sedgwick oversaw the procurement of over \$1 billion in goods and services, including personal protective equipment. She helped develop and refine safety metrics for contractors to be used in determining contract awards.



## ***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 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 over the last 20 years. He currently serves as Sempra's Chief Risk Officer as well as its Chief Compliance Officer. In addition to enterprise risk management and compliance, his responsibilities include emergency management, physical security and cybersecurity. Most recently, he was Deputy General Counsel for Sempra. Mr. Borthwick was previously general manager of Sempra Renewables, leading all aspects of Sempra's renewable energy subsidiary, including commercial development, finance and operations, as well as supporting the sale of its U.S. wind and solar assets. He was also 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.

### **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**

**(2019-present)** As Deputy General Counsel, Mr. Borthwick's responsibilities included 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](http://luzdelsur.com.pe/en)), the largest electric company in Peru, from March 2019 to April 2020, when Sempra sold its interest in the company. Mr. Borthwick led Sempra's efforts to create and implement annual Safety Summits beginning in 2019 that bring together leaders from across the Sempra family of companies to discuss best practices and advance safety culture from a corporate governance perspective. Achieved Directorship Certification from the National Association of Corporate Directors (NACD) in December 2022, which included training on how to appropriately oversee risk management and safety from a corporate governance perspective.

In May 2023, Mr. Borthwick became Sempra's Chief Risk Officer. His responsibilities include enterprise risk management, safety, emergency management, compliance, physical security and cybersecurity. He also leads Sempra's Safety Culture Committee to lead transformation initiatives focused on Sempra's leadership behaviors and actions that impact the safety cultures across the enterprise.