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**VIA ELECTRONIC FILING**

**OEIS Docket # 2025-SCs**

Suzie Rose  
Program Manager, Electrical Safety Policy Division  
Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**Re: San Diego Gas & Electric Company's Request for a 2025 Safety Certification Pursuant to Public Utilities Code Section 8389 Addendum 1**

Dear Program Manager Suzie Rose:

Pursuant to Public Utilities Code Section 8389(e)-(f), San Diego Gas & Electric Company (SDG&E or Company) hereby submits this addendum to its safety certification request submitted on December 2, 2025.

The Office of Energy Infrastructure Safety (Energy Safety) approved SDG&E's 2024 Safety Certification Request on December 11, 2024.<sup>1</sup> "A safety certification is valid for 12 months following the issuance of the certification."<sup>2</sup> An electrical corporation must submit a request for a Safety Certification "before the expiration of a certification,"<sup>3</sup> consistent with the schedule issued by Energy Safety each year.<sup>4</sup> Public Utilities Code Section 8389(f)(2) requires that Energy Safety "shall issue a certification within 90 days

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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 11, 2024 ("2024 Safety Certification Approval"). Available at <https://efiling.energysafety.ca.gov/Search.aspx?docket=2024-SCs>

<sup>2</sup> Public Utilities Code Section 8389(f)(1).

<sup>3</sup> Public Utilities Code Section 8389(f)(2).

<sup>4</sup> *Office of Energy Infrastructure Safety's Safety Certification Guidelines (Safety Certification Guidelines)* (April 28, 2025) at 1-2, OEIS Docket No Guidelines-SCs, *citing* Pub. Util. Code §8389(f)(2).

of a request if the electrical corporation has provided documentation that it has satisfied the requirements of subdivision (e)” of Section 8389.<sup>5</sup>

SDG&E timely submitted its safety certification request on December 2, 2025, noting that Energy Safety had issued a Draft Decision approving SDG&E’s 2026-2028 Base Wildfire Mitigation Plan (WMP) and was still in the process of issuing a final decision. SDG&E’s safety certification request also noted that Energy Safety was still in the process of considering SDG&E’s 2025 Executive Compensation Structure and that SDG&E’s 2024 Safety Culture Assessment remained pending with Energy Safety.<sup>6</sup>

Consistent with Energy Safety’s Safety Certification Guidelines,<sup>7</sup> SDG&E is submitting the following updates to its safety certification request:

- On December 19, 2025, Energy Safety issued its final 2024 Safety Culture Assessment Report for SDG&E.<sup>8</sup> The 2025 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 Public Utilities Code Sections 8386.2 and 8389(d)(4), if applicable.”<sup>9</sup> On January 9, 2026, SDG&E agreed to implement the recommendations of the 2024 Safety Culture Assessment.<sup>10</sup> SDG&E has thus satisfied the requirement that it is in “good standing” pursuant to Public Utilities Code Section 8389(e)(2).

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<sup>5</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>6</sup> Letter from Dan Skopec, SVP & CRO, SDG&E to Suzie Rose, Program Manager, Electrical Safety Policy Division, Office of Energy Infrastructure Safety, *SDG&E Safety Certification Request*, OEIS Docket No. 2025-SCs (December 2, 2025), available at <https://efiling.energy.ca.gov/Search.aspx?docket=2025-SCs>.

<sup>7</sup> *Office of Energy Infrastructure Safety’s Safety Certification Guidelines* (Safety Certification Guidelines) (April 28, 2025) at 2-3, OEIS Docket No Guidelines-SCs

<sup>8</sup> *2024 Safety Culture Assessment for San Diego Gas & Electric Company*, OEIS Docket No. 2024-SCAs (December 19, 2025), available at <https://efiling.energy.ca.gov/Search.aspx?docket=2024-SCAs>.

<sup>9</sup> 2025 Safety Certification Guidelines at 3.

<sup>10</sup> *Agreement of San Diego Gas & Electric to Implement the Findings of the 2024 Safety Culture Assessment Report*, OEIS Docket No. 2024-SCAs (January 9, 2026), available at <https://efiling.energy.ca.gov/Search.aspx?docket=2024-SCAs>.

- On December 29, 2025, Energy Safety issued a Decision approving SDG&E's 2025 Executive Compensation Structure.<sup>11</sup> With this approval, SDG&E meets the requirements of Public Utilities Code Sections 8389(e)(4) and (e)(6).
- On February 2, 2026, Energy Safety issued a Final Decision approving SDG&E's 2026-2028 Base WMP.<sup>12</sup> With this approval, SDG&E meets the requirements of Public Utilities Code Section 8389(e)(1).

With these final updates, SDG&E meets the requirements of Public Utilities Code Section 8389(e). Accordingly, SDG&E respectfully requests that Energy Safety expeditiously issue SDG&E's 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

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<sup>11</sup> *Office of Energy Infrastructure Safety Decision on San Diego Gas and Electric Company's 2025 Executive Compensation Structure Submission*, OEIS Docket No. 2025-EC (December 29, 2025), available at <https://efiling.energysafety.ca.gov/Search.aspx?docket=2025-EC>.

<sup>12</sup> *Decision for the SDG&E 2026-2028 Base WMP*, OEIS Docket No. 2026-2028-Base-WMPs (February 2, 2026) at 1, available at <https://efiling.energysafety.ca.gov/Search.aspx?docket=2026-2028-Base-WMPs>.