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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 Certificate Pursuant to Public Utilities Code Section 8389 Addendum 2

Dear Program Manager Suzie Rose:

Pursuant to Public Utilities Code Section 8389(2)(A), San Diego Gas & Electric Company (SDG&E or Company) hereby submits this addendum to its certificate request, submitted on December 2, 2025. This addendum provides clarification regarding the reporting of SDG&E's implementation of its 2023-2025 Base Wildfire Mitigation Plan (WMP).

The Office of Energy Infrastructure Safety (Energy Safety) approved SDG&E's 2024 Safety Certification Request on December 11, 2024.¹ "A certificate shall be valid for the 12 consecutive months following the issuance of the certificate."² An electrical corporation must submit a request for a certificate "before the expiration of a certificate,"³ consistent with the schedule issued by Energy Safety each year.⁴ Public Utilities Code Section 8389(2)(A) requires that Energy Safety "shall issue a certification within 90 days of a request if the electrical corporation has provided documentation that

¹ 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>

² Public Utilities Code Section 8389(b)(1).

³ Public Utilities Code Section 8389(2)(A).

⁴ *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).

it has satisfied the requirements in subdivision (a)” of Section 8389.⁵ Public Utilities Code Section 8389 (B) also states “the Office may, for good cause, in writing, extend the 90-day period”.

SDG&E timely submitted its certificate 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 certificate 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.⁶

SDG&E submitted an addendum to its initial certificate request on December 2, 2025, to incorporate Energy Safety’s issuance of its (1) Final 2024 Safety Culture Assessment Report for SDG&E, (2) Decision Approving SDG&E’s 2025 Executive Compensation Structure, and (3) Final Decision Approving SDG&E’s 2026-2028 Base WMP.⁷

This second addendum provides clarification as to (1) the number of quantitative initiatives tracked as part of SDG&E’s 2023-2025 Base WMP, (2) the status of the three WMP initiatives labelled as “cancelled” in SDG&E’s original certificate request; Microgrid WMP.462, Capacitor Maintenance and Replacement (SCADA) WMP.453, and Wireless Fault Indicators WMP.449, and (3) the timeframe used to report the status of SDG&E’s implementation of initiatives.

SDG&E previously reported the following three different figures regarding the number of WMP initiatives tracked:

- SDG&E’s initial certificate request submitted on December 2, 2025, stated that “SDG&E continues to track 41 quantitative targets proposed in its 2023-2025 Base WMP.”⁸

⁵ Public Utilities Code Section 8389(4)(A) provides that “[n]otwithstanding paragraph (1), a certificate shall remain valid until the office acts on the electrical corporation’s pending request for a certificate.”

⁶ 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>.

⁷ 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 Addendum 1*, OEIS Docket No. 2025-SCs (February 4, 2026), available at <https://efiling.energy.ca.gov/Search.aspx?docket=2025-SCs>.

⁸ 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) at page 9, available at <https://efiling.energy.ca.gov/Search.aspx?docket=2025-SCs>.

- SDG&E’s Q1 through Q3 2025 Quarterly Reporting stated that “SDG&E tracks 42 quantitative initiatives established in its 2023-2025 Wildfire Mitigation Plan.”⁹
- SDG&E Q4 2025 Quarterly Reporting stated that “SDG&E tracks 43 quantitative initiatives established in its 2023-2025 Wildfire Mitigation Plan.”¹⁰

The correct number of quantitative initiatives SDG&E tracks as part of its 2023-2025 Base WMP is 42.

There are 44 total approved programs in SDG&E’s 2023-2025 WMP Base Plan, as reported in 2025 WMP Metrics Table 1 and the 2025 Quarterly Reporting. Of those, 42 of the programs have quantitative targets. There are two programs that are qualitatively measured; Generator Grant Program (WMP .466) and Generator Assistance Program (WMP .467). Both of these qualitative programs were completed by December 31, 2025.

Per SDG&E’s approved 2023-2025 WMP Base Plan, three quantitative programs have an approved target of zero for 2025: Microgrid WMP.462, Capacitor Maintenance and Replacement (SCADA) WMP.453, and Wireless Fault Indicators WMP.449. Energy Safety requires ongoing reporting on these programs throughout the three-year WMP cycle, as there were measurable targets in other years within the Plan. In SDG&E’s first quarter reporting, it reported progress on these programs as “Planned,” as the approved target was zero, and there was no planned progress. SDG&E revised its reporting on these three programs between Q1 and Q2 from “Planned” to “Cancelled.” Despite the fact that there was no affirmative cancellation of these programs, based on the available selection options within the OEIS data templates (Planned, In Progress, Completed, Delayed, Cancelled) SDG&E concluded that “Cancelled” was the best available option to describe a program with a zero target for a given year.

The 41 programs originally reported in SDG&E’s certificate request reflects the total 44 programs minus the three “Cancelled” programs. This characterization was in error. SDGE’s approved WMP includes a total of 42 quantitative programs, as reported in SDG&E’s Quarterly Reporting. To be more consistent and align with the Quarterly Reporting, SDG&E is amending the 2025 certificate request to accurately reflect the 42 quantitative programs approved in SDG&E’s 2023-2025 WMP Base Plan.

The Q4 Quarterly Report references 43 quantitative initiatives, but this was an inadvertent error and should have been reported as 42. SDG&E plans to resubmit its relevant 2025 quarterly reports to make any necessary revisions.

⁹ The Quarterly Notification Letters are available for review on SDG&E’s website, at <https://www.sdge.com/2025-wildfire-mitigation-plan> and <https://www.sdge.com/2026-2028-wildfire-mitigation-plan>.

¹⁰ February 2, 2026 Quarterly Notification Letter, *supra*.

Further, SDG&E's initial certificate request submitted on December 2, 2025 stated that the 2025 target completion was reflective of SDG&E's most recent quarterly reporting (Q3), reported on November 3, 2025. In SDG&E's Q3 Quarterly Reporting, SDG&E reported 10 initiatives completed, 29 in progress, and 3 cancelled (42 total initiatives). The safety certificate request in fact reflects progress on approved WMP targets as of the December 2, 2025 submission. As of that date, SDG&E's progress on WMP implementation included 18 completed initiatives, 21 in progress, and 2 delayed. The 2 delayed programs are incorporated in the 21 in progress, thus matching SDG&E's Q3 submittal of 39. When the 3 programs categorized originally as cancelled are included, it reflects the accurate total of 42 quantitatively measured programs.

With these clarifications, SDG&E respectfully requests that Energy Safety expeditiously issue SDG&E's certificate. Please contact me if you have any questions about this request.

Sincerely,

A handwritten signature in black ink that reads "Dan Skopec". The signature is written in a cursive style with a large initial "D".

Dan Skopec
Senior Vice President
& Chief Regulatory Officer
SAN DIEGO GAS & ELECTRIC COMPANY