



March 2, 2026

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SUBJECT: Office of Energy Infrastructure Safety Issuance of San Diego Gas & Electric Company's Certificate

Mr. Skopec:

The Office of Energy Infrastructure Safety (Energy Safety) hereby issues San Diego Gas & Electric Company (SDG&E) a Certificate pursuant to Public Utilities Code section 8389(e). SDG&E's December 2, 2025, request for a 2025 Certificate¹ meets all statutory requirements. This Certificate is valid for 12 months from issuance and has only the force and effect given to it by Public Utilities Code sections 451.1(c) and 8389.

Energy Safety must issue a Certificate if SDG&E provides documentation that it meets the requirements set forth in Public Utilities Code section 8389(e)(1) through (e)(7). These requirements are detailed below, with an overview of Energy Safety's findings for SDG&E for each requirement.

Recent legislative changes from Senate Bill 254, signed into law and effective on September 19, 2025,² amended the Public Utilities Code sections for Certificates. This decision is based on the Public Utilities Code sections and uses those section numbers for Certificates as they existed at the time Energy Safety's Safety Certification Guidelines Version 1.0 were published on April 25, 2025. Future Certificate decisions will be evaluated by Energy Safety under the newly amended Public Utilities Code sections.

¹ SDG&E's 2025 Certificate Request

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59796&shareable=true>, accessed January 23, 2026).

² Senate Bill 254, Energy (2025–2026), Chapter 119, stat. 2025

(https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202520260SB254, accessed January 8, 2026).

1. Approved Wildfire Mitigation Plan

Public Utilities Code section 8389(e)(1) requires that “[t]he electrical corporation has an approved wildfire mitigation plan [WMP].” SDG&E submitted its 2026-2028 Base WMP on September 30, 2025.³ Energy Safety issued its Decision approving SDG&E’s 2026-2028 Base WMP on February 2, 2026.⁴ SDG&E has satisfied the requirement of Public Utilities Code section 8389(e)(1).

2. Good Standing

Public Utilities Code section 8389(e)(2) requires that “[t]he electrical corporation is in good standing, which can be satisfied by the electrical corporation having agreed to implement the findings of its most recent safety culture assessment [SCA] performed pursuant to Section 8386.2 and paragraph (4) of subdivision (d), if applicable.”

Energy Safety published its most recent SCA for SDG&E on December 19, 2025, and identified five recommendations, listed below:

1. *Better Understand Safety Risks Associated with Performance Pressure and Distractions*
2. *Continue Progress on Addressing Public Interaction Risks*
3. *Understanding the Safety Culture Perception Gap*
4. *Identify Next Steps in Achieving Workforce Engagement in Safety Event Reporting*
5. *Improve Contractor Engagement in the Workforce Survey*⁵

On January 9, 2026, SDG&E formally agreed to implement the findings and recommendations of Energy Safety’s 2024 SCA for SDG&E.⁶ SDG&E’s agreement to implement the findings satisfies the “good standing” requirement of Public Utilities Code section 8389(e)(2) for its 2025 Certificate request because the Energy Safety 2023 SCA is the most recent and only SCA performed pursuant to Public Utilities Code section 8386.2 or paragraph (4) of subdivision (d) of Public Utilities Code section 8389.

3. Board of Directors Safety Committee

Public Utilities Code section 8389(e)(3) requires that “[t]he electrical corporation has established a safety committee of its board of directors composed of members with relevant safety experience.”

³ SDG&E 2026-2028 Base WMP

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59448&shareable=true>, accessed January 23, 2026).

⁴ SDG&E 2026-2028 Base WMP Decision

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60138&shareable=true>, accessed February 10, 2026).

⁵ 2024 Safety Culture Assessment for SDG&E

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59956&shareable=true>, accessed January 23, 2026).

⁶ SDG&E’s Acceptance of 2024 Safety Culture Assessment

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60050&shareable=true>, accessed January 23, 2025).

SDG&E's Certificate request states that it has established a Safety Committee⁷ composed of members of its Board of Directors with relevant safety experience.⁸

SDG&E reports the Safety Committee membership as follows:

- Robert J. Borthwick
- Caroline A. Winn
- Glen A. Donovan

In Attachment A of its Certificate request, SDG&E provides a resume for each member of its Safety Committee, highlighting each member's relevant safety-related experience.⁹

SDG&E has satisfied the requirement of Public Utilities Code section 8389(e)(3).

4. Executive Compensation

Public Utilities Code section 8389(e)(4) requires that "[t]he electrical corporation has established an executive incentive compensation structure approved by [Energy Safety] and structured to promote safety as a priority and to ensure public safety and utility financial stability with performance metrics, including incentive compensation based on meeting performance metrics that are measurable and enforceable, for all executive officers, as defined in Section 451.5. This may include tying 100 percent of incentive compensation to safety performance and denying all incentive compensation in the event the electrical corporation causes a catastrophic wildfire that results in one or more fatalities."

Public Utilities Code section 8389(e)(6)(A)(i)(I) requires "[s]trict limits on guaranteed cash compensation, with the primary portion of the executive officers' compensation based on achievement of objective performance metrics." Clause (i)(II), requires "[n]o guaranteed monetary incentives in the compensation structure." Clause (ii) requires that the compensation structure "satisfies the compensation principles identified in paragraph (4)," noted above. Clause (iii) requires "[a] long-term structure that provides a significant portion of compensation, which may take the form of grants of the electrical corporation's stock, based on the electrical corporation's long-term performance and value. This compensation shall be held or deferred for a period of at least three years." Clause (iv) requires "[m]inimization or elimination of indirect or ancillary compensation that is not aligned with shareholder and taxpayer interest in the electrical corporation."

⁷ SDG&E's 2025 Certificate Request, pp. 3-4

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59796&shareable=true>, accessed December 19, 2025).

⁸ SDG&E's 2025 Certificate Request, 3-4

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59796&shareable=true>, accessed January 23, 2026).

⁹ SDG&E's 2025 Certificate Request Attachment A

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59796&shareable=true>, accessed January 23, 2026).

SDG&E submitted a request for approval of its 2025 executive compensation structure on May 23, 2025.¹⁰ Energy Safety determined that SDG&E's executive compensation structure satisfied the requirements of Public Utilities Code sections 8389(e)(4) and (e)(6) and approved SDG&E's executive compensation structure on December 29, 2025.¹¹

SDG&E has satisfied the requirements of Public Utilities Code sections 8389(e)(4) and (e)(6).

5. Board-Level Safety Reporting

Public Utilities Code section 8389(e)(5) requires that “[t]he electrical corporation has established board-of-director-level reporting to the [California Public Utilities Commission {CPUC}] and [Energy Safety] on safety issues.”

To satisfy the requirements of Public Utilities Code section 8389(e)(5), SDG&E's Certificate request cites the August 19, 2025, public meeting on utility safety practices, hosted jointly by Energy Safety and the CPUC. The purpose of this meeting was to provide information to the Director of Energy Safety, CPUC Commissioners, and the public about the electrical infrastructure safety efforts of SDG&E, including progress and challenges concerning wildfire mitigation, worker safety, and safety culture. During this meeting, three members of the executive staff gave a presentation and answered questions from Energy Safety and the CPUC. 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; and Jonathan Woldemariam, SDG&E Director of Wildfire Mitigation.

Pursuant to the Safety Certification Guidelines Version 1.0 requirement¹² that an electrical corporation provide any materials used or referenced in the public meeting in its Certificate requests, SDG&E provided its presentation slides in its Certificate request.^{13,14}

SDG&E has satisfied the requirements of Public Utilities Code section 8389(e)(5).

6. Limits on Executive Compensation

Public Utilities Code section 8389(e)(6) is addressed under “Executive Compensation” above.

¹⁰ SDG&E's 2025 Executive Compensation Structure Submission

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58540&shareable=true>, accessed January 28, 2026).

¹¹ Approval of SDG&E's 2025 Executive Compensation Structure

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60008&shareable=true>, accessed January 23, 2026).

¹² Energy Safety's 2025 Certificate Guidelines Version 1.0, p. 3

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58353&shareable=true>, accessed January 23, 2026).

¹³ See SDG&E's presentation beginning at 3:38:52 in the recording of the public meeting “Interagency Public Briefing on Electric Utilities Safety Culture and Public Safety Power Shutoffs” (August 19, 2025)

(<https://www.adminmonitor.com/ca/cpuc/workshop/20250819/>, accessed January 23, 2026).

¹⁴ SDG&E Annual Safety Culture & PSPS Briefing Slides (August 19, 2025)

(<https://www.sdge.com/sites/default/files/regulatory/SDGE%202025%20Safety%20Culture%20and%20PSPS%20Briefing.pdf>, accessed January 23, 2026).

7. WMP Implementation

Public Utilities Code section 8389(e)(7) requires that “[t]he electrical corporation is implementing its approved [WMP].” This statute requires the electrical corporation to “file a notification of implementation of its [WMP] with [Energy Safety] and an information-only submittal with the [CPUC] on a quarterly basis.” These quarterly notifications and information-only submittals must include information on “the implementation of both its approved [WMP] and recommendations of the most recent [SCAs] by the [CPUC] and [Energy Safety], and a statement of the recommendations of the board of directors safety committee meetings that occurred during the quarter.” The statute also stipulates that these quarterly notifications and submittals must “summarize the implementation of the safety committee recommendations from the electrical corporation’s previous notification and submission.”

The current Safety Certification Guidelines Version 1.0 further specify that:

“In its Safety Certification request, the electrical corporation must detail the progress it has made toward completing its WMP targets, explain any delayed or off-track efforts, include the recommendations from its latest Energy Safety and CPUC safety culture assessment(s), and show progress in the implementation of the findings of its most recent safety culture assessment(s).” Furthermore, to meet the requirements of section 8389(e)(7), electrical corporations must submit quarterly notifications.¹⁵

Subsequent to receiving its last Certificate,¹⁶ SDG&E submitted quarterly notifications to Energy Safety on the required subjects on February 1, 2025,¹⁷ May 1, 2025,¹⁸ August 1, 2025,¹⁹ and

¹⁵ Energy Safety’s Certificate Guidelines Version 1.0, p. 3

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58353&shareable=true>, accessed January 28, 2026).

¹⁶ SDG&E 2024 Certificate Issuance Letter

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57708&shareable=true>, accessed January 23, 2026).

¹⁷ SDG&E’s Quarterly Notification Letter from February 1, 2025

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57908&shareable=true>, accessed January 28, 2026);

Attachment A: SDG&E 2025 Wildfire Mitigation Plan February 1, 2025 Quarter Progress Update

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57907&shareable=true>, accessed January 28, 2026).

¹⁸ SDG&E’s Quarterly Notification Letter from May 1, 2025

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58385&shareable=true>, accessed January 28, 2026);

Attachment A: SDG&E 2025 Wildfire Mitigation Plan May 1, 2025 Quarter Progress Update

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58386&shareable=true>, accessed January 28, 2026).

¹⁹ SDG&E’s Quarterly Notification Letter from August 1, 2024

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59114&shareable=true>, accessed January 28, 2026);

Attachment A: SDG&E 2025 Wildfire Mitigation Plan August 1, 2024 Quarter Progress Update

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59113&shareable=true>, accessed January 28, 2026).

November 3, 2025.²⁰ Attachments to these notifications include quantitative metrics indicating SDG&E's progress on the wildfire mitigation initiatives described in its 2023-2025 Base WMP.

Pursuant to Public Utilities Code section 8389(e)(7) and Energy Safety's Safety Certificate Guidelines Version 1.0, SDG&E submitted quarterly notifications to the CPUC as information-only submittals on February 1, 2025, May 1, 2025, August 1, 2025, and November 3, 2025.²¹

WMP Implementation Progress:

SDG&E reported that as of the end of the third quarter of 2025, it had met its commitments for 10 of the 42 quantitative mitigation initiatives in its 2023-2025 Base WMP.

In SDG&E's February 25, 2026, Addendum 2 to its Certificate request²², SDG&E reported on all 42 quantitative initiatives, stating that at the time of its Certificate request dated December 2, 2025, 18 initiatives were complete, 21 were in progress, and three had targets of zero for 2025 (no planned progress). SDG&E also reported in its Addendum 2 that its two qualitative initiatives were complete effective December 31, 2025. As of the date of SDG&E's Q3 Quarterly Notification submitted on November 3, 2025, SDG&E reported that two of its mitigation initiatives were not on track for timely completion: Hotline Clamps and PSPS Sectionalizing Enhancements.²³ For the two mitigation initiatives that were not on track for timely completion, SDG&E provided an explanation detailing the circumstances of each in its Certificate request.

Energy Safety will continue to monitor and assess the implementation of the remaining initiatives as part of Energy Safety's compliance assurance activities.²⁴

SDG&E has met the requirement of Public Utilities Code section 8389(e)(7) to provide information on the implementation of its approved WMP.

²⁰ SDG&E's Quarterly Notification Letter from November 3, 2025 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59573&shareable=true>, accessed January 28, 2026); Attachment A: SDG&E's 2024 Wildfire Mitigation Plan November 3, 2025 Quarter Progress Update (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59574&shareable=true>, accessed January 28, 2026).

²¹ Per SDG&E February 1, 2025, May 1, 2025, August 1, 2025, and November 3, 2025, Quarterly Notifications.

²² SDG&E's 2025 Certificate Request Addendum 2 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60331&shareable=true>, accessed February 26, 2026).

²³ SDG&E's Quarterly Notification Letter from November 3, 2025 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59573&shareable=true>, accessed January 29, 2026).

²⁴ Energy Safety's Performance Guidelines (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59899&shareable=true>, accessed January 15, 2025).

SCA Recommendation Implementation Progress:

Energy Safety published its most recent SCA for SDG&E on December 19, 2025, and identified five recommendations, as noted above.²⁵ SDG&E submitted its recent agreement to implement the findings of Energy Safety's the 2024 SCA Report for SDG&E on January 9, 2026.²⁶

As the 2024 SCA for SDG&E was issued after SDG&E's Certificate request was submitted, SDG&E reported on actions taken to address recommendations from its 2023 SCA in its 2025 Certificate request,²⁷ which was the most recent assessment completed at the time of its Certificate request.²⁸

SDG&E has met the requirements of Public Utilities Code section 8389(e)(7) by providing information on the implementation of its 2023 SCA recommendations.

Board Safety Committee Recommendations and Implementation Summary:

SDG&E included descriptions of its Safety Committee's recommended actions in its quarterly notifications.

According to the descriptions provided in its quarterly notifications, SDG&E's management has implemented the majority of the Safety Committee's recommendations, with three recommendations pending implementation: Driving Safety Update, Telematics Update, and a Fall-Related Injury Prevention Presentation.²⁹

SDG&E has met the requirement of Public Utilities Code section 8389(e)(7) to provide statements of the recommendations of the Safety Committee meetings and summaries of the implementation status of those recommendations.

²⁵ 2024 Safety Culture Assessment for SDG&E

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59956&shareable=true>, accessed January 29, 2026).

²⁶ SDG&E's Acceptance of 2024 Safety Culture Assessment

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60050&shareable=true>, accessed January 29, 2026).

²⁷ SDG&E's 2025 Certificate Request, p. 3

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59796&shareable=true>, accessed January 29, 2026).

²⁸ Per SDG&E's February 1, 2025, May 1, 2025, August 1, 2025, and November 3, 2025, Quarterly Notifications.

²⁹ SDG&E's Quarterly Notification Letter from November 3, 2025

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59573&shareable=true>, accessed January 29, 2026).

Conclusion

SDG&E's request for a Certificate satisfies the statutory requirements in Public Utilities Code section 8389(e). Energy Safety expects SDG&E to uphold the values stated in its submissions and to continue to advance safety as a top priority. This letter constitutes Energy Safety's issuance of SDG&E's 2025 Certificate. Pursuant to Public Utilities Code section 8389(f)(1), this Certificate is valid for 12 months from the date of this letter.

/s/ Caroline Thomas Jacobs

Caroline Thomas Jacobs

Director

Office of Energy Infrastructure Safety