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VIA E-MAIL

**SUBJECT: 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)**

Per Public Utilities Code Section 8389(e)(7) and the February 16, 2021 Wildfire Safety Division (WSD) Compliance Operational Protocols,<sup>1</sup> San Diego Gas & Electric Company (SDG&E or the Company) hereby submits to the Office of Energy Infrastructure Safety (OEIS) this notification detailing the implementation of its approved Wildfire Mitigation Plan and the recommendations of the most recent safety culture assessment; a statement of recommendations of the Board of Directors Safety Committee (Safety Committee) meetings that occurred during the quarter;<sup>2</sup> and a summary of the implementation of the Safety Committee recommendations from SDG&E's previous notification letter.<sup>3</sup>

**PURPOSE**

The purpose of this notification is to comply with the requirements of Section 8389(e)(7), which were added to the Public Utilities Code by Assembly Bill (AB) 1054 on July 12, 2019, and subsequently amended by AB 148 on July 22, 2021, to reflect the transition of the Wildfire Safety Division at the California Public Utilities Commission to the Office of Energy Infrastructure Safety (OEIS). Section 8389(e)(7) requires electrical corporations to file a notice of implementation of its wildfire mitigation plan with OEIS "on a quarterly basis that details the implementation of both its approved wildfire mitigation plan and recommendations of the most recent safety culture assessment, and a statement of recommendations of the board of directors safety committee meetings that occurred during the quarter." Section 8389(e)(7) also requires that the notification "summarize the implementation of safety committee recommendations from the electrical corporation's previous notification and submission." SDG&E is simultaneously submitting this notice to the California Public Utilities Commission as an information only submittal.<sup>4</sup>

**BACKGROUND**

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<sup>1</sup> The WSD's Compliance Operational Protocols provides guidance on the contents, format, and timing of the compliance reporting the WSD requires of the electrical corporations.

<sup>2</sup> This notification includes information relating to activities and events that occurred in the second quarter of 2022.

<sup>3</sup> SDG&E Notification Letter Filed on May 2, 2022.

<sup>4</sup> Public Utilities Code Section 8389(e)(7).

Governor Newsom signed AB 1054 into law on July 12, 2019. AB 1054 contains numerous statutory provisions and amendments designed to enhance the mitigation and prevention of catastrophic wildfires – including wildfires linked to utility equipment – in California. AB 1054 added Section 8389 to the Public Utilities Code. Section 8389(e) establishes the requirements for annual safety certifications<sup>5</sup> and, *inter alia*, requires electrical corporations to establish a safety committee of its board of directors composed of members with relevant safety experience, establish board-of-director-level reporting to the Commission on safety issues, and file quarterly submissions notifying OEIS and the Commission of the implementation of its Wildfire Mitigation Plan and other matters as described above.

## **DISCUSSION**

### **Implementation of SDG&E's Approved Wildfire Mitigation Plan**

SDG&E tracks 41 quantitative metrics and 29 qualitative metrics on 69 different mitigations proposed in its 2022 Wildfire Mitigation Plan Update. These mitigations are categorized across the ten categories within the WMP including Situational Awareness and Forecasting, Grid Design and System Hardening, Asset Management and Inspections, and Vegetation Management and Inspections. These initiatives are implemented to mitigate the risk of ignitions due to a fault on the electric system and reduce the impacts of PSPS to customers. SDG&E's main system hardening initiatives of covered conductor installation and undergrounding of electric distribution infrastructure provide risk reduction by reducing the likelihood of an ignition. SDG&E has mitigation programs to enhance SDG&E's risk models and help prioritize infrastructure replacement and provide strategies and tools for real time decision making during emergency response or PSPS events. SDG&E also has mitigations intended to reduce the impact of a wildfire once an ignition has occurred, including high-definition cameras, ground and aerial fire suppression resources, and a fuels management program. SDG&E has implemented measures to mitigate the customer impacts associated with PSPS events, including the installation of remote switches to limit the number of customers exposed to PSPS, the establishment of customer resource centers during PSPS events, and SDG&E's customer outreach programs.

In Attachment A hereto, SDG&E provides a breakdown of the progress on quantitative targets for these mitigations. In summary, SDG&E has fire hardened 85 miles of its electric system including 26.3 miles of undergrounding and 32.4 miles of covered conductor. SDG&E has completed 99% of its detailed electric inspections and 87% of vegetation inspections in 2022. More information on these metrics can be found in SDG&E's Quarterly Initiative Update, also filed November 1, 2022.

### **Implementation of SDG&E's Most Recent Safety Culture Assessment**

Energy Safety issued SDG&E's 2021 Safety Culture Assessment on September 2, 2021. The safety culture assessment was conducted by a third-party contractor, DEKRA, on behalf of Energy Safety. DEKRA assessed the safety culture of SDG&E through workplace surveys and interviews, and generally found that SDG&E "has a robust process for measuring and improving the safety culture, with ambitious near and long-term safety objectives supported by field-based projects

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<sup>5</sup> SDG&E received its 2020 safety certification from the WSD via a letter dated September 14, 2020.

and initiatives for frontline supervisors, employees, and contractors.”<sup>6</sup> DEKRA made three recommendations for SDG&E to act upon:

1. 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.
2. Clarify, coach, and track the behaviors field leadership needs to adopt to advance the safety culture.
3. Recognize and take action to mitigate the serious exposure posed by interactions with certain discontented members of the public.

On September 3, 2021, SDG&E agreed to implement all of the findings and recommendations from its 2021 safety culture assessment report. As stated in SDG&E’s Request for a 2022 Safety Certification<sup>7</sup>, SDG&E “is continually working to promote innovation and enhancement in its safety culture.”<sup>8</sup> To highlight its efforts to implement the recommendations of its most recent safety culture assessment, SDG&E continues perform activities to implement the safety culture assessment report through various methods, including but not limited to the following:

- Operational managers and supervisors communicating and educating workers on the safe behaviors associated with mitigating hazards from wildfires and hostile interactions with discontented members of the public.
- Updating SDG&E’s safety observation checklists to identify safe and at-risk behaviors associated with mitigating hazards from wildfires.
- Safety advisors hosting meetings with groups who are likely to have interaction with members of the public and providing public safety training refreshers.
- Expansion of SDG&E’s near miss reporting application to capture wildfire-related risks and risks posed by discontented members of the public.
- Hosting company-wide psychological safety town hall events and manager training workshops to educate and promote a culture of safety and trust.
- Chief Safety Officer performing on-site safety visits (rotating district locations) with direct employee engagement, and monitoring interactions and feedback.
- District leadership (Directors) performing on-site safety visits (rotating district locations) with direct employee engagement; tracking interactions and feedback.
- District leaders holding safety all-hands meetings to clarify and set safety expectations to advance the safety culture.
- Executive Safety Council (ESC) soliciting feedback from front-line operational employees and supervision on safety culture.
- Modifying BBS observation checklist descriptions to include instructions for observers to consider whether employees are identifying potential hazards on customer premises.
- Establishing an Electric Distribution Operations BBS process to help improve awareness of switching error hazards, increase psychological safety in raising and learning from errors, with an ultimate goal of improving safe and accurate switching for the safety of field personnel and the public.

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<sup>6</sup> *Safety Culture Assessment for San Diego Gas & Electric Company*, prepared by DEKRA (September 2021).

<sup>7</sup> *San Diego Gas & Electric Company’s Request for a 2022 Safety Certification Pursuant to Public Utilities Code Section 8389*, submitted September 9, 2022.

<sup>8</sup> *Id.* at 10.

Additionally, since its August 1, 2022 Quarterly Notification, SDG&E has performed the following activities to support the above-listed initiatives for implementing safety culture assessment report recommendations:

- SDG&E held monthly Electric Safety Subcommittee and Gas Safety Subcommittee meetings where Near Misses, Safety Incidents, and the status of open action items were reviewed. These meetings also provide a roundtable for employees of all levels, including Union representatives, to raise safety concerns or suggestions. Additionally, bi-weekly Office Safety Committee Directors meetings were held to review safety leading and lagging indicators, identify targeted areas of focus, and share any best practices or lessons learned.
- SDG&E held monthly Safety Incident Review Meetings with operational Directors, Managers, Supervisors, safety teams, SDG&E's Director – Safety and Chief Safety Officer to review safety incidents and Near Misses that had the potential to have caused serious injury or fatality (SIF-potential) to identify corrective actions, safety improvements, and lessons learned. Following these meetings, lessons learned are shared with teams for broader awareness and continuous safety improvement.
- On September 22, 2022, SDG&E Board Safety Committee members and leaders participated in the 2022 Public Safety Briefing Meeting to provide the CPUC, Energy Safety, and the public information about SDG&E's electric safety related efforts, including wildfire prevention actions and management of utility safety.
- On October 17 and 18, 2022, SDG&E hosted two "Q3 2022 SMS All-Hands Report Out" presentations. All employees were invited to attend. These presentations communicate progress towards SDG&E's 2022 safety goals, highlight safety initiatives, committees and teams, recognize safety achievements, share best practices and lessons learned, and identify targeted areas of focus for the upcoming quarter.
- On October 28, 2022, SDG&E held its annual Safety Congress, available to all employees, with a theme of "reenergize and refocus." During this event, SDG&E's CEO Caroline Winn, President and CFO Bruce Folkmann, Chief Operating Officer and Chief Safety Officer Kevin Geraghty, and Chief Compliance Officer Mike Schneider, shared their thoughts on the Company's safety culture and Safety Management System, and Nate Fairman, business manager of the IBEW local 465, provided his perspective, endorsement of SDG&E's safety programs, and recognized represented workforce supporting these programs to continually improve safety.
- During Q3 2022, SDG&E's newly established Electric Distribution Operations (EDO) Behavior Based Safety (BBS) process completed leadership assessments and coaching and hosted five DEKRA training workshops.

### **Meetings of SDG&E's Board Safety Committee Meeting**

The SDG&E Board Safety Committee<sup>9</sup> advises and assists the Board of Directors in the oversight of safely providing electric and natural gas services to the Company's customers. In SDG&E's

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<sup>9</sup> SDG&E's Board Safety Committee membership has changed since its prior Quarterly Notification Letter. The Safety Committee members now include Robert J. Borthwick, Chairman; Karen Sedgwick; and Caroline A. Winn.

prior Quarterly Notification Letter, submitted August 1, 2022, SDG&E provided updates on two prior meetings of SDG&E's Board Safety Committee. The Safety Committee met on April 26, 2022 and July 20, 2022, during which it received presentations from SDG&E management and employees. SDG&E's next Board Safety Committee meeting is schedule for November 8, 2022. SDG&E will provide additional information regarding the subjects discussed during the meeting in its next quarterly submission.

### **Implementation of Recommendations of the Board of Directors Safety Committee in the Prior Quarter**

As discussed above, SDG&E's upcoming Board Safety Committee meeting is schedule for November 8, 2022. Additional information regarding the implementation of Safety Committee recommendations will be provided in SDG&E's next quarterly submission.

### **Update on SDG&E'S Wildfire Safety Community Advisory Council Meetings**

Per the requirement established in D.20-05-051 that SDG&E report on advisory council activities on a quarterly basis, SDG&E's Wildfire Safety Community Advisory Council met on August 19, 2022. The Wildfire Safety Community Advisory Council (WSCAC) is comprised of several important stakeholders in the SDG&E community and includes representatives from local and tribal governments, public safety partners, and Access and Functional Needs communities.

The August 19 meeting commenced with the introduction of new Council members, as well as an update on community enhancement activities performed by Council members, including the creation of Cox Communications "Tech Tank," to assist in addressing the digital divide among seniors. SDG&E's Chief Executive Officer, Caroline Winn, also announced that Kevin Geraghty, SDG&E's Chief Operating Officer and Chief Safety Officer, would be assuming the role of Chair of the WSCAC beginning with the next meeting.

Ms. Winn introduced SDG&E's 2022 wildfire safety advancements and presented its annual video summarizing the enhancements SDG&E has made toward promoting wildfire and PSPS safety in preparation for the peak 2022 wildfire season. Ms. Winn highlighted that, for 2022, SDG&E has, among other things:

- Advanced risk modeling and situational awareness, leveraging artificial intelligence.
- Continued grid hardening by increasing strategic undergrounding and covered conductor to achieve additional wildfire risk mitigation.
- Increased customer support by expanding AFN support services.
- Promoted wildfire preparedness through Emergency Operations Center exercises, community outreach, public education, and public safety partnerships.

Ms. Winn also provided updates on SDG&E's tribal relations efforts, a new partnership with the girl scouts to promote wildfire safety and address wood waste, and education and workforce partnerships with the Southwestern College Fire Science Technology Academy and Women's Fire Academy. SDG&E was a sponsor of three local programs to help introduce the fire service to under-represented candidates and prepare them for the rigors of the Fire Training Academies.

Brian DAgostino, SDG&E Vice President for Wildfire and Climate Science, presented on the 2022 California wildfire conditions to date. Mr. DAgostino noted that, statewide, wildfire activity is trending significantly below the five-year average, in some part thanks to the additional rainfall in Northern California as well as slightly cooler than normal temperatures as of mid-August. However, drought conditions continue to persist throughout both California and the western region of the country. Mr. DAgostino also presented on the vegetation and weather conditions prior to the Coastal Fire in Orange County in May, 2022 and addressed SDG&E's efforts to mitigate wildfire risk in its coastal canyon regions.

Alex Moffat, SDG&E Manager for Business Services, presented on updates to Public Safety Power Shutoff (PSPS) preparations for 2022. Ms. Moffatt described enhancements to SDG&E's PSPS outreach in response to 2021 customer feedback, including the development of expanded notifications and SDG&E's new Alexa skill. SDG&E has also expanded its tribal outreach efforts and developed a dedicated Spanish communications team to promote additional PSPS preparation and awareness. SDG&E shared its 2022 PSPS website, developed using stakeholder and customer feedback to promote accessibility and an improved mobile experience. Additionally, Ms. Moffat discussed SDG&E's new Public Safety PSPS Portal, and Critical Facilities and Infrastructure outreach.

Will Speer, SDG&E Vice President for Electric Engineering and Construction, presented an update on the summer energy supply and preparedness for expected summer load conditions. Mr. Speer discussed the roles and responsibilities of both SDG&E and the California Independent System Operator (CAISO) and their collaborative efforts to undergo a comprehensive planning effort to prepare for summer high loads. Mr. Speer presented on potential risk events related to reliability, including large-scale heat wave events, wildfires, and unexpected transmission outages. He also discussed the emerging shift in peak load and demand times, and efforts by CAISO and the utilities statewide to implement additional resource procurement.

Ms. Winn led a roundtable discussion regarding the meeting topics and shared key takeaways. During roundtable, representatives of the San Diego County Water Authority discussed the potential for a meeting to address additional PSPS preparations for water distribution. Ms. Winn agreed to arrange additional discussions with the appropriate teams.

## **NOTICE**

This filing will be submitted to the Office of Energy Infrastructure Safety, the Executive Director of the California Public Utilities Commission, and posted to SDG&E's website (<https://www.sdge.com/2022-wildfire-mitigation-plan>).

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company