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VIA E-MAIL

Caroline Thomas Jacobs  
Director, Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**RE: SDG&E's Quarterly Notification Pursuant to Public Utilities Code section 8389(e)(7)**

**Docket #2023-SC**

Dear Director Thomas Jacobs:

Pursuant to Public Utilities Code Section 8389(e)(7) and the June 2023 Office of Energy Infrastructure Safety's (Energy Safety) Safety Certification Guidelines,<sup>1</sup> San Diego Gas & Electric Company (SDG&E or the Company) hereby submits to the Office of Energy Infrastructure Safety (Energy Safety) this notification detailing the implementation of (1) SDG&E's approved Wildfire Mitigation Plan (WMP), (2) implementation of the recommendations of the Company's most recent safety culture assessment, (3) a statement of the recommendations of the Board of Directors Safety Committee (Safety Committee) meetings that occurred during the quarter, and (4) a summary of the implementation of prior Safety Committee recommendations.

## **I. BACKGROUND**

Governor Newsom signed Assembly Bill (AB) 1054 into law on July 12, 2019. AB 1054 contains numerous statutory provisions and amendments designed to enhance the mitigation and prevention of utility-related catastrophic wildfires in California and promote utility financial stability, including the creation of the safety certification process. Public Utilities Code Section 8389(e) established the requirements the electrical corporations to receive an annual safety certification,<sup>2</sup> which, among other things, include an approved WMP and implementation of the initiatives therein, the establishment of a safety committee of the electrical corporation's board of directors, board-of-director-level reporting to the Commission on electrical system safety, and the

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<sup>1</sup> Energy Safety's Safety Certification Guidelines provides guidance on the contents, format, and timing of the compliance reporting Energy Safety requires of the electrical corporations.

<sup>2</sup> SDG&E received its safety certification from Energy Safety via a letter dated December 8, 2022.

submission of quarterly reports notifying Energy Safety and the Commission regarding WMP implementation and compliance with other AB 1054 requirements.

Specifically, Public Utilities Code Section 8389(e)(7) requires electrical corporations to file a notice of implementation of its approved Wildfire Mitigation Plan with Energy Safety “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’s Quarterly Notification for the second quarter of 2023 is contained herein.

## **II. DISCUSSION**

### **1) Quarterly Information-Only Submittal to the CPUC**

SDG&E is simultaneously submitting this quarterly notification to the California Public Utilities Commission as an information-only submittal via email to Executive Director Rachel Peterson at [rachel.peterson@cpuc.ca.gov](mailto:rachel.peterson@cpuc.ca.gov).<sup>3</sup>

### **2) Quarterly Progress Report on WMP Implementation**

SDG&E tracks 39 quantitative targets proposed in its 2023-2025 Wildfire Mitigation Plan. SDG&E’s WMP initiatives are designed to mitigate the risk of due to a fault on the electric system and reduce the impacts of PSPS to customers. These mitigations are categorized across three categories within the WMP including Grid Design, Operations and Maintenance, Vegetation Management and Inspections, and Situational Awareness and Forecasting.

SDG&E’s primary system hardening initiatives, namely the installation of covered conductor and strategic undergrounding of electric distribution infrastructure provide risk reduction by reducing the likelihood of an ignition. To inform investment decision making and promote reduction of risk in fire-prone areas, SDG&E has mitigation programs to enhance its risk modeling 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 in the event of an ignition, including high-definition cameras, ground and aerial fire suppression resources, and a fuels management program. Additionally, 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 to support customers during PSPS events, and SDG&E’s customer outreach programs to promote both wildfire and PSPS preparedness.

A detailed update on SDG&E’s WMP initiative progress for the second quarter of 2023 is included in Attachment A. In summary, SDG&E has fire hardened 33.7 miles of its electric system, including 4.4 miles of undergrounding and 16 miles of covered conductor. SDG&E has completed 76% of its detailed distribution inspections, 30% of its detailed transmission inspections, and 49%

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<sup>3</sup> Public Utilities Code Section 8389(e)(7).

of its detailed vegetation inspections for 2023. More information on these metrics can be found in SDG&E's Quarterly Data Report, also filed August 1, 2023.

### **3) Quarterly Progress Report on Implementing Safety Culture Assessment Recommendations**

Pursuant to Public Utilities Code Section 8389(d)(4), Energy Safety issued its 2022 Safety Culture Assessment Report for SDG&E on May 8, 2023 (2022 SCA Report). The report details the assessment carried out by the National Safety Council (NSC), who worked to assess the safety culture of SDGE through management self-assessment as well as workplace surveys and interviews. The NSC generally concluded that SDG&E has exhibited continued commitment to advancing its safety culture maturity.”<sup>4</sup>

The 2022 SCA Report provided three recommendations for SDG&E:

1. 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.
2. 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.
3. 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.

On June 15, 2023, SDG&E agreed to implement all of the findings and recommendations from its 2022 SCA Report.<sup>5</sup> As stated in SDG&E's Request for a 2022 Safety Certification<sup>6</sup>, SDG&E “is continually working to promote innovation and enhancement in its safety culture.”<sup>7</sup> To highlight its efforts to implement the recommendations of its most recent safety culture assessment, SDG&E continues perform activities to implement the 2021 and 2022 safety culture assessment reports through various methods, including but not limited to the following:

- Leadership site visits and listening sessions.

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<sup>4</sup> 2022 SCA Report at p. 3.

<sup>5</sup> *Agreement of San Diego Gas & Electric to Implement the Findings of the 2022 Safety Culture Assessment, June 15, 2023* (Energy Safety Docket # 2022-SCAs).

<sup>6</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>7</sup> *Id.* at 10.

- Monthly Electric Safety Subcommittee meetings where employees can raise and discuss safety topics that are documented and tracked through resolution.
- 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.

Additionally, SDG&E reports the following activities performed specifically to implement the 2022 Safety Culture Assessment Report recommendations:

#### Implementation of Recommendation 1

- During Q2, 2023, SDG&E's executive team visited 13 sites to connect in-person with and solicit feedback from hundreds of employees district-wide.
- On May 18, 2023, SDG&E hosted a Quarterly Business Update. This was a hybrid meeting with an option to attend in-person or virtually and all SDG&E employees were invited to attend. Approximately 750 employees were in attendance. The executive panel, who provided key safety updates and areas of focus included: Caroline Winn, Chief Executive Officer; Bruce Folkmann, President and Chief Financial Officer; Scott Crider, Senior Vice President of External and Operations Support; and Kendall Helm, Vice President of People and Culture.
- On July 18, 2023, SDG&E held an Executive Safety Council meeting where representatives from SDG&E's company-wide employee safety committees (i.e., employee-led district/department safety committees) were asked to discuss initiatives, successes and challenges directly with SDG&E Executive Leadership, including SDG&E's Chief Safety Officer and Chief Risk Officer.

#### Implementation of Recommendation 2

- SDG&E continues to advance deployment of its Field Service Delivery organization formed in 2022. Field Service Delivery is focused on enhancing the way our company

conducts field work by optimizing processes, resources, and technology from the point of job intake and design through job execution in the field. This includes all gas, electric and service-order based jobs, such as transformer change-outs, gas pipe replacements and meter replacements. The primary objective is to provide a safe, easy, and modern field service experience for customers and employees. The group is looking forward to leveraging a consolidated view of gas, electric, and service work in the context of customer impacts.

- 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 app is used by SDG&E's Electric Regional Operations Construction Supervisors and back-office team members to digitally capture job requirements, including identification of potential safety concerns during pre-construction field work. This information is tied to the workorder and asset, so crews not only have the ability to view this information but update it. 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.

### Implementation of Recommendation 3

- SDG&E deployed enhancements to its company-wide Safety Dashboard – accessible to all SDG&E employees – to include tracking of anonymous and non-anonymous Near Miss Report submittals as a leading safety culture indicator.
- 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, including tracking on non-anonymous submittals, and highlights follow-up action items, safety reminders and key teachings.

#### **4) Board of Directors Safety Committee Recommendations**

The SDG&E Board Safety Committee<sup>8</sup> advises and assists the SDG&E Board of Directors in the oversight of safely providing electric and natural gas services to the Company's customers. Since the last Quarterly Notification, the Safety Committee met on July 18, 2023, and discussed the following topics:

- Kevin Geraghty, SDG&E Chief Safety Officer and Chief Operating Officer, provided a report on SDG&E's most recent safety metrics. Mr. Geraghty addressed vehicle safety issues and controllable motor vehicle incidents. The Committee members also discussed a recent contractor motor vehicle incident at Sempra Infrastructure.
- Michael Schneider, SDG&E Chief Risk Officer and Vice President for Risk Management and Chief Compliance Officer, discussed SDG&E's recent safety audits and the safety

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<sup>8</sup> SDG&E's Board Safety Committee members include Robert J. Borthwick, Chair of the Board Safety Committee and Chief Risk Officer at Sempra; Karen Sedgwick, Chief Administrative Officer and Chief Human Resources Officer at Sempra; and Caroline A. Winn, SDG&E Chief Executive Officer.

audit process. Mr. Schneider noted that SDG&E uses a risk informed approach to safety audits to prioritize areas of focus. In 2022, SDG&E performed three distinct safety related audits, including the areas of Contractor Safety, Electric Generation – Environmental, Health & Safety Air Permitting, and the Environmental Safety and Compliance Management Program. Ms. Winn noted that SDG&E’s safety culture is fostered by an environment where officers share ownership of their audits and any identified issues. Mr. Schneider added that SDG&E business areas encourage audit recommendations and look forward to the opportunity to enhance their safety practices.

- Mr. Geraghty provided an update on preparations for the upcoming board-level updates to the CPUC and Energy Safety regarding electrical system safety.
- Brian D’Agostino, Vice President for Wildfire and Climate Science at SDG&E, provided an update on the upcoming wildfire season and the developing El Nino. Mr. D’Agostino discussed the wet winter conditions in 2023 and the improvement in statewide drought conditions. He noted that while the wet winter and moderate spring would result in some lower fire risk, that risk could increase with higher summer and fall temperatures. Mr. D’Agostino also discussed the development of El Nino conditions, which typically lead to wetter conditions for the southern United States and can result in coastal flooding.
- Richard Veihl, SDG&E Fire Coordinator, discussed the recent Envista Root Cause Analysis of the 2017 and 2018 PG&E wildfires, and any areas where SDG&E may benefit from lessons learned. Mr. Veihl noted that SDG&E continues to work to enhance its emergency response preparedness, particularly with respect to coordination and cooperation in the event of larger, more complex incidents.
- Oliva Reyes, SDG&E Director of Construction Management and Robert Watson, SDG&E Safety Director, presented regarding SDG&E’s contractor safety programs. The presentation addressed how SDG&E began an effort to enhance and coordinate contractor safety efforts under SDG&E’s Safety Department, including new efforts to classify and grade contractors based on performance and safety culture. The program has continued to evolve in a positive manner, receiving good feedback from contractors, strong safety progress, and demonstration of continual learning.

#### **4.1) Recommendations from the Most Recent Quarter**

As Safety Committee Chair, Mr. Borthwick recommended that, at an upcoming Safety Committee meeting, SDG&E report on the following:

- Inspections of legacy gas transmission lines, and the Company’s programs to address public safety during gas incidents;
- The Company’s internal wildfire challenge sessions and any actions taken by the Company in response to prepare for the Fall Santa Ana season.

#### **4.2) Progress on Previous Recommendations**

Currently pending Safety Committee recommendations include the following recommendations from the July 18, 2023 meeting:

- SDG&E report on inspections of legacy gas transmission lines, and the Company's programs to address public safety during gas incidents;
- SDG&E 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.

SDG&E expects to fulfill these recommendations at an upcoming Board Safety Committee meeting before the end of 2023.

#### **4.3) Implementation of Prior Committee Recommendations**

On November 8, 2022, SDG&E's Board Safety Committee previously recommended that SDG&E schedule a vegetation management site visit. On July 14, 2023, the Board Safety Committee visited a vegetation management site to observe contractor safety practices in tree trimming.

Mr. Veihl's presentation addressing the Envista Root Cause Analysis of the 2017 and 2018 PG&E wildfires fulfilled a prior Safety Committee recommendation.

Ms. Reyes and Mr. Watson's presentation addressing SDG&E contractor safety programs fulfilled a prior Safety Committee recommendation.

#### **5) 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 last met on May 5, 2023. 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 May 5, 2023 meeting commenced with the Council Chair, SDG&E Chief Operating Officer Kevin Geraghty providing introductory remarks. Mr. Geraghty noted SDG&E's recent application for Infrastructure Investment and Jobs Act funds to support strategic undergrounding in tribal areas. He also discussed SDG&E's recent recognition by Chartwell for achievements in wildfire risk modeling.

Brian D'Agostino provided a review of the wet winter conditions and a fire season outlook. Mr. D'Agostino noted the potential for additional grass fires due to additional growth drying out during hotter conditions, but reflected that the overall fire season outlook was normal.

Jonathan Woldemariam, SDG&E Director for Wildfire Mitigation, reviewed SDG&E's recent Wildfire Mitigation Plan submission. Mr. Woldemariam noted the diversity of SDG&E's WMP team both in demographics and also in backgrounds, skills, and expertise. Mr. Woldemariam noted that the WMP's strengths derive from the diversity of skills and knowledge contributed by the team implementing SDG&E's 2023-2025 WMP. Mr. Woldemariam also discussed how SDG&E's data and the use of it has grown substantially, and noted the SDG&E's recent transition to cloud-based storage and processing to improve speed and flexibility in the collection, storage, and use of data. Mr. Woldemariam discussed questions with the council regarding undergrounding efforts.

Mona Freels, SDG&E Emergency Services Manager, provided information on recent enhancements to SDG&E's PSPS Public Safety Partner Portal and additional mobile portal applications. Ms. Freels noted that SDG&E continues to transition its Public Safety Partner Portal to cover not only wildfire, but all hazards. SDG&E has also developed partner focus groups working to better understand public safety partner needs to facilitate a streamlined approach with enhanced communications and services.

Mr. Geraghty closed the meeting with a roundtable for feedback and comments.

### **III. 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/2023-wildfire-mitigation-plan>).

Respectfully submitted,

*/s/ Laura M. Fulton*

Attorney for  
San Diego Gas and Electric Company