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October 20, 2023

## ELECTRONIC FILING OEIS Docket No. 2023-SCs

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

## Re: San Diego Gas & Electric Company's Request for a 2023 Safety Certification Pursuant to Public Utilities Code Section 8389 Addendum 1

Dear Director Thomas Jacobs:

Pursuant to Public Utilities Code Section 8389(e)-(f) and the Office of Energy Infrastructure Safety's Safety Certification Guidelines,<sup>1</sup> San Diego Gas & Electric Company ("SDG&E") hereby submits this addendum to its safety certification request submitted on September 8, 2023.

The Office of Energy Infrastructure Safety ("Energy Safety") approved SDG&E's 2022 Safety Certification Request on December 8, 2022.<sup>2</sup> To ensure alignment with the annual safety certification cadence and Energy Safety workstreams, "an electrical corporation must submit to Energy Safety a request for a safety certification for the following 12 months 90 days prior to the expiration of a certification."<sup>3</sup> SDG&E timely submitted its safety certification request on September 8, 2023, noting that Energy

<sup>&</sup>lt;sup>1</sup> Office of Energy Infrastructure Safety's Safety Certification Guidelines, OEIS Docket No 2023-SCs (June 28, 2023) ("Safety Certification Guidelines") at 6-7, available at https://efiling.energysafety.ca.gov/Search.aspx?docket=2023-SCs.

<sup>&</sup>lt;sup>2</sup> Letter from Caroline Thomas Jacobs, Director, Office of Energy Infrastructure Safety to Dan Skopec, SVP & CRO, SDG&E, Office of Energy Infrastructure Safety Issuance of San Diego Gas & Electric Company's Safety Certification (December 8, 2022), available at https://efiling.energysafety.ca.gov/Search.aspx?docket=2022-SCs.

<sup>&</sup>lt;sup>3</sup> Safety Certification Guidelines at 1, (*citing* Pub. Util. Code § 8389(f)(2); California Government Code § 15475.6.).

Safety was still in the process of considering its 2023-2025 Wildfire Mitigation Plan and its 2023 Executive Compensation submission.<sup>4</sup>

Consistent with Energy Safety's Safety Certification Guidelines,<sup>5</sup> SDG&E is submitting the following updates to its safety certification request.

- On October 13, 2023, Energy Safety issued a Final Decision approving SDG&E's 2023-2025 WMP, noting, "SDG&E has a relatively strong Wildfire Mitigation Plan compared to the plans of the other large electrical corporations. ... SDG&E knows its wildfire risk and is focused on the highest risk circuits in its system."<sup>6</sup> With this approval, SDG&E meets the requirements of Public Utilities Code Section 8389(e)(1).
- On September 20, 2023, Energy Safety issued a Final Decision approving SDG&E's 2023 executive compensation structure, finding that SDG&E's executive compensation met the requirements of Public Utilities Code Sections 8389(e)(4) and 8389(e)(6)(A)(i).<sup>7</sup> With this approval, SDG&E meets the requirements of Public Utilities Code Sections 8389(e)(4) and 8389(e)(6).

With these two final approvals, 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

<sup>&</sup>lt;sup>4</sup> Letter from Dan Skopec, SVP & CRO, SDG&E to Caroline Thomas Jacobs, Director, Office of Energy Infrastructure Safety, *SDG&E Safety Certification Request*, OEIS Docket No. 2023-SCs (September 8, 2023), available at https://efiling.energysafety.ca.gov/Search.aspx?docket=2023-SCs.

<sup>&</sup>lt;sup>5</sup> Safety Certification Guidelines at 6-7.

<sup>&</sup>lt;sup>6</sup> Final Decision on San Diego Gas & Electric Company's 2023-2025 WMP, OEIS Docket No. 2023-WMP (October 13, 2023) at 1, available at

https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2023-2025-WMPs.

<sup>&</sup>lt;sup>7</sup> Letter from Lucy Morgans, Program Manager, Office of Energy Infrastructure Safety, to Laura Fulton, Senior Counsel, SDG&E, Office of Energy Infrastructure Safety Final Approval of San Diego Gas and Electric Company's 2023 Executive Compensation Structure Pursuant to Public Utilities Code Section 8389(e)(4) and 8389(e)(6), and 2023 Executive Compensation Structure Submission Guidelines, OEIS Docket No. 2023-ECs (September 20, 2023), available at https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2023-EC.