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**VIA ELECTRONIC FILING**

**OEIS Docket # 2024-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 2024 Safety Certification Pursuant to Public Utilities Code Section 8389 Addendum 1**

Dear Program Manager Suzie Rose:

Pursuant to Public Utilities Code Section 8389(e)-(f), San Diego Gas & Electric Company (SDG&E or Company) hereby submits this addendum to its safety certification request submitted on October 8, 2024.

The Office of Energy Infrastructure Safety (Energy Safety) approved SDG&E's 2023 Safety Certification Request on December 7, 2023.<sup>1</sup> "A safety certification is valid for 12 months following the issuance of the certification."<sup>2</sup> An electrical corporation must submit a request for a Safety Certification "before the expiration of a certification,"<sup>3</sup> consistent with the schedule issued by Energy Safety each year.<sup>4</sup> Public Utilities Code Section 8389(f)(2) requires that Energy Safety "shall issue a certification within 90 days

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<sup>1</sup> 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 7, 2023 ("2023 Safety Certification Approval"). Available at <https://efiling.energysafety.ca.gov/Search.aspx?docket=2023-SCs>

<sup>2</sup> Public Utilities Code Section 8389(f)(1).

<sup>3</sup> Public Utilities Code Section 8389(f)(2).

<sup>4</sup> *Office of Energy Infrastructure Safety's Safety Certification Guidelines (Safety Certification Guidelines)* (August 8, 2024) at 1, OEIS Docket No Guidelines-SCs, *citing* Pub. Util. Code §8389(f)(2).

of a request if the electrical corporation has provided documentation that it has satisfied the requirements of subdivision (e)” of Section 8389.<sup>5</sup>

SDG&E timely submitted its safety certification request on October 8, 2024, noting that Energy had issued a Draft Decision approving SDG&E’s 2025 Wildfire Mitigation Plan (WMP) Update and was still in the process of issuing a final decision.<sup>6</sup> Consistent with Energy Safety’s Safety Certification Guidelines,<sup>7</sup> SDG&E is submitting the following update to its safety certification request.

- On October 30, 2024, Energy Safety issued a Final Decision approving SDG&E’s 2025 WMP Update.<sup>8</sup> With this approval, SDG&E meets the requirements of Public Utilities Code Section 8389(e)(1).

With this final approval, 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/ Laura Fulton

Laura Fulton

Attorney for

San Diego Gas and Electric Company

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<sup>5</sup> Public Utilities Code Section 8389(f)(4) provides that “[n]otwithstanding paragraph (1), a safety certification shall remain valid until the division acts on the electrical corporation’s pending request for safety certification.”

<sup>6</sup> 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. 2024-SCs (October 8, 2024), available at <https://efiling.energysafety.ca.gov/Search.aspx?docket=2024-SCs>.

<sup>7</sup> Safety Certification Guidelines at 6-7.

<sup>8</sup> *Decision for San Diego Gas & Electric 2025 Wildfire Mitigation Plan Update*, OEIS Docket No. 2023-2025-WMPs (October 30, 2024) at 1, available at <https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2023-2025-WMPs>.