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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 #2025-SCs

Dear Director Thomas Jacobs:

Pursuant to Public Utilities Code Section 8389(e)(7) and the April 2025 Office of Energy Infrastructure Safety's (Energy Safety) Safety Certification Guidelines,¹ 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,² 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

¹ 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.

² SDG&E received its current safety certification from Energy Safety via a letter dated December 11, 2024.

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 first quarter of 2025 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, and the CPUC Safety Policy Division at safetypolicycentralfiles@cpuc.ca.gov.³ In addition, pursuant to the guidance received from the Commission’s Safety Policy Division, SDG&E is also simultaneously serving this quarterly notification as an information-only submittal via email to the service lists of Order Instituting Rulemaking (R.) 21-10-001 (Order Instituting Rulemaking to Develop Safety Culture Assessments for Electric and Natural Gas Utilities), R.18-10-007 (Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901), and Application 22-05-016 (SDG&E’s most recent General Rate Case application proceeding).

2) Quarterly Progress Report on WMP Implementation

SDG&E tracks 42 quantitative initiatives established in its 2023-2025 Wildfire Mitigation Plan. SDG&E’s WMP initiatives are designed to mitigate the risk of wildfire 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, achieve risk reduction by reducing the likelihood of an ignition. SDG&E utilizes and continues to enhance its risk modeling to inform decision making for mitigation selection and prioritization and during emergency response or PSPS events.

SDG&E also employs mitigations intended to reduce the impact of 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 sectionalizing switches to limit the number of customers exposed to PSPS, the establishment of community

³ Public Utilities Code Section 8389(e)(7).

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 first quarter of 2025 is included in Attachment A. SDG&E's ability to implement its approved 2025 WMP is deeply impacted by its 2024 General Rate Case Decision (GRC Decision), which authorized significant cuts to annual initiative targets and expenditures. SDG&E submitted a Petition to Amend its 2025 WMP to Energy Safety on April 10, 2025 requesting to reduce eleven program targets and increase one program target. The requested changes are presented below for reference. Although the decision to approve the Petition to Amend is pending from Energy Safety, SDG&E is implementing the requested target changes in alignment with the GRC Decision and therefore is off-track for ten of the twelve initiatives noted below.

WMP Initiative	Unit	Original Target	Requested Target
Strategic Undergrounding (WMP.473)	miles	125	28
Covered Conductor (WMP.455)	miles	40	50
Strategic Pole Replacement Program (WMP.1189)	Poles	291	200
Transmission OH Hardening (WMP.543)	Miles	4.64	2
Distribution Communications Reliability Improvements (WMP.549)	base stations	42	5
Drone Assessments (WMP.552)	inspections	13,500	6,500
Lightning Arrester Removal/Replacement (WMP.550)	lightning arresters	1,848	90
Connectors, including hotline clamps (WMP.464)	hotline clamps	950	100
Avian Protection (WMP.972)	poles	200	95
Expulsion Fuse Replacement (WMP.459)	fuses	700	80
Detailed Vegetation Inspections (WMP.494)	inspections	485,400	255,000
Pole Clearing (WMP.512)	poles	33,010	22,000

As of March 31, 2025, SDG&E has fire hardened 13.37 miles of its electric system, including 9.42 miles of undergrounding and 3.84 miles of covered conductor. SDG&E is on track to complete its required transmission and distribution inspections and its vegetation management activities in the HFTD. SDG&E is also continuing to implement its advanced protection initiatives including Early Fault Detection and initiatives that lessen the impacts of PSPS such as PSPS Sectionalizing. More information on initiative progress and outcome metrics is provided in SDG&E's Quarterly Data Report, also filed May 1, 2025.

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) and its 2023 Safety Culture Assessment Report on March 22, 2024 (2023 SCA Report). Each report details the assessment carried out by the National Safety Council (NSC), who worked to assess the safety culture of SDG&E through management self-assessment as well as workplace surveys and interviews. In both the 2022 and 2023 SCA Reports, the NSC generally concludes that SDG&E has exhibited continued commitment to advancing its safety culture maturity.”⁴

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

- 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.
- 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.
- 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.

The 2023 SCA Report included three recommendations for SDG&E that were largely similar to the 2022 recommendations and included a fourth recommendation as follows:

- SDG&E should increase engagement on the safety culture assessment within the workforce supporting wildfire mitigation initiatives.

On June 15, 2023, SDG&E agreed to implement all of the findings and recommendations from its 2022 SCA Report.⁵ On April 5, 2024, SDG&E agreed to implement all of the findings and recommendations from its 2023 SCA Report.⁶ As stated in SDG&E’s Request for a 2023 Safety Certification⁷, SDG&E “is continually working to promote innovation and enhancement in its safety culture.”⁸ To highlight its efforts to implement the recommendations of its most recent

⁴ 2022 SCA Report at p. 3; 2023 SCA Report at p. 3.

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

⁶ *Agreement of San Diego Gas & Electric to Implement the Findings of the 2023 Safety Culture Assessment, April 5, 2024* (Energy Safety Docket # 2023-SCAs).

⁷ *San Diego Gas & Electric Company’s Request for a 2023 Safety Certification Pursuant to Public Utilities Code Section 8389*, submitted September 8, 2023.

⁸ *Id.* at 10.

safety culture assessment, SDG&E continues perform activities to implement the 2021, 2022 and 2023 safety culture assessment reports⁹ through various methods, including but not limited to the following:

- Leadership site visits and listening sessions.
- 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 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, Managers) 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 during Q1 2025 to implement its 2022 and 2023 Safety Culture Assessment Report recommendations. SDG&E is reporting on implementation of both its 2022 and 2023 Safety Culture Assessment Report Recommendations.¹⁰

Implementation of Recommendation 1

- In Q1 2025, SDG&E held its third annual "Start Strong" offsite safety event that gathers our field workforce to reinforce key safety messaging and spread awareness of available resources. Approximately 1,200 members of our field and Union-represented workforce (~75% of represented employees) attended this half day event. SDG&E leadership and employee representatives demonstrated their commitment to advancing our safety

⁹ SDG&E's 2024 safety culture assessment report has not yet been issued.

¹⁰ Given the general overlap of the recommendations for 2022 and 2023, and consistent with the requirements of Public Utilities Code Section 8389(e)(7) that electrical corporations provide an update on the "most recent" safety culture assessment recommendations in the QNL, future submissions will focus on implementation of the 2023 SCA Report recommendations. SDG&E is awaiting issuance of its 2024 SCA Report.

performance and safety culture through presentations and discussions about safety teamwork and leadership.

- In Q1 2025, SDG&E partnered with contractor leadership to host the first contractor quarterly meeting of 2025. The focus of this event was aligning the culture of safety between SDG&E and its contractors. Topics included a review of the 2024 safety metrics, 2025 Wildfire and Climate Updates, Distracted Driving and Traffic Control Awareness, Dig-In Prevention Best Practices, as well as contractor presentations related to the evolution of Safety Culture within their respective companies.
- SDG&E held its Q1 Executive Safety Council Meeting on March 28, 2025. Comprised of cross-functional leadership, the Council met at SDG&E's North Coast C&O district to hear directly from employees on their safety experiences to identify opportunities for continued safety improvement by supporting safety initiatives, dedicating resources, and removing barriers to continually advance as a learning organization and reinforce SDG&E's culture of safety.
- SDG&E Executive Leadership continued issuance of weekly employee-wide communications highlighting weekly safety performance, recognizing instances of stopped work and submissions of near miss reports, lessons learned, key safety reminders, and reinforcing leadership's commitment to safety.

Implementation of Recommendation 2

- During Q1 2025, SDG&E deployed improvements to its energization process to help simplify the customer journey by making it easier to find information, understand next steps, and track progress. Through these changes, SDG&E's goal is to improve customer satisfaction and enable customers, both residential and commercial, to start using their electrical services with minimal delays. This effort will help improve public and employee safety by aiming to reduce the frequency of customers circumventing SDG&E procedures and altering equipment prior to SDG&E's onsite visit.
- During Q1 2025, SDG&E continued to monitor customer and employee feedback on work completed by the Customer Field Organization as part of its Advanced Customer Notification pilot (launched in Q2 2024 to enhance employee safety measures when performing work on or around customer property).
- In Q1 2025, SDG&E advanced its Advance Customer Notification deployment efforts to expand notifications for Gas Patrols. These notifications inform customers of our gas patrol work in their areas and includes a link to a website that describes this type of work as well as a video showing customers what to expect. These courtesy text and email messages were successfully deployed on October 1, 2024.
- SDG&E leadership continues to emphasize the importance of "Stop the Job" whenever an unsafe condition is perceived. Instances of stopped work are recognized during Safety Committee meetings and weekly Near Miss Summary Reports sent to all employees, where applicable.
- SDG&E continues to mature 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 gas and electric 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.

- SDG&E continues to advance deployment of its Geocall Electric Pre-Construction Mobile Fielding Application launched in Q4 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 application 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. 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

- During Q1 2025, SDG&E employees submitted 96 Near Miss Reports. Of those, 67% were submitted anonymously. SDG&E deployed enhancements to its Near Miss dashboard to provide greater data insights into anonymous vs. non-anonymous submissions to help identify opportunities for improvement.
- During Q1 2025, SDG&E continued 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, highlights follow-up action items, resulting safety improvements, safety reminders, key teachings, and recognizes instances of stopped work.
- Specific to its Ignition Management Program, SDG&E continues to train employees on evidence of heat and find efficiencies with incident reporting. SDG&E has chosen to incorporate the notification and reporting requirements from OEIS regulation 29300 (Cal. Code Regs. tit. 14 § 29300) into our Ignition Management Program. Improvements have been made regarding the efficiency of reporting incidents that meet regulatory requirements and documenting of potential fire ignitions (incidents where evidence of heat is found but no ignition occurred, for example charring on a crossarm). Fire Coordination is now getting notification from Service Dispatch on all SDG&E resource requests related to a response of emergency services for a possible fire. In 2024, SDG&E performed an internal review of the Ignition Management Program, including feedback from subject matter experts and areas of other expertise to ensure an independent and diverse pool of opinions were considered in furtherance of continued improvement. In 2025, SDG&E is reviewing the outcomes of that review process and working to implement recommendations to promote additional efficiencies and opportunities to improve reporting processes.

Implementation of Recommendation 4 (2023 SCA Report only)

- As SDG&E prepared for its 2024 Safety Culture Assessment, it worked to solicit increased engagement within the employee and contractor workforce supporting wildfire mitigation initiatives.
- SDG&E's 2024 Safety Culture Assessment launched on January 6, 2025. Employees and Contractors identified as survey participants were encouraged to provide their feedback and reminded of the anonymity of survey responses.
- On February 4, 2025, a cross-functional team of SDG&E representatives met with Energy Safety and NSC staff to provide additional insights and answers to NSC's follow-up questions from SDG&E's submitted Management Self-Assessment.

4) Board of Directors Safety Committee Meetings and Recommendations

The SDG&E Board Safety Committee¹¹ 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. The Safety Committee met on February 26, 2025. Kevin Geraghty, Chief Operating Officer and Chief Safety Officer for SDG&E, provided an update on safety metrics and the company's safety performance to date. Brian D'Agostino, SDG&E Vice President for Wildfire Mitigation and Climate Science, reviewed the 2024-2025 fire season and discussed SDG&E's recent PSPS events. Mr. D'Agostino also presented SDG&E's 2026-2028 Wildfire Mitigation Plan (WMP) and described program enhancements and targets covered by the new triennial WMP. Tashonda Taylor, SDG&E Vice President for Gas Operations, discussed SDG&E's Gas Leak Mitigation and Damage Prevention Programs, and Bob Watson, SDG&E Director for Safety, provided an update on SDG&E's Employee Safety Programs. Miguel Romero, SDG&E Chief Commercial Officer, and Fernando Valero, SDG&E Director for Advanced Clean Technology, updated the Safety Committee on SDG&E's Battery Energy Storage System Safety efforts and SDG&E's investigation into the Escondido Battery Energy Storage System fire in September 2024.

Rob Borthwick, Chair of the SDG&E Safety Committee, also discussed the retention of an independent outside safety consultant. After discussion, the Committee approved the retention of Erick Michrowski of Propulo Consulting as a Professional Advisor.

4.1) Recommendations from the Most Recent Quarter

During the February 26, 2025 Board Safety Committee meeting, Rob Borthwick, Board Safety Committee Chair, recommended that, at an upcoming Safety Committee meeting, SDG&E report on the following:

- A review of SDG&E's late 2024 and January 2025 PSPS events and mutual aid efforts in response to the LA Fires, and report on any lessons learned, and

¹¹ SDG&E's Board Safety Committee members include Robert J. Borthwick, Chair of the Board Safety Committee and Chief Risk Officer at Sempra; Glen Donovan, Senior Vice President for Finance at Sempra; and Caroline A. Winn, SDG&E Chief Executive Officer.

- SDG&E's customer communications and notifications regarding field visits and routine work notifications.

4.2) Progress on Previous Recommendations

Pending and recently completed Safety Committee Recommendations are summarized in the following table.

Meeting Date	Recommendation	Status
July 18, 2023	Report on inspections of legacy gas transmission lines, and the Company's programs to address public safety during gas incidents	Completed February 28, 2024
November 7, 2023	Report on the 2020 PacifiCorp fires	Completed April 23, 2024
February 28, 2024	Report on the Company's efforts to prepare for extreme weather events, including flooding and tropical storms, as well as lessons learned from prior events	Completed October 17, 2024
February 28, 2024	Conduct a site visit to a wildfire hardening location	Completed April 16, 2024
April 23, 2024	Report on potential safety hazards associated with battery energy storage systems, and SDG&E's efforts to mitigate battery safety risks	Completed July 25, 2024
July 25, 2024	Report on potential safety hazards associated with pole failures, SDG&E's efforts to mitigate pole failure risks, and pole replacement safety	Completed October 17, 2024
October 17, 2024	Report on contractor safety performance and contractor safety performance accountability	Pending
February 26, 2025	Review SDG&E's late 2024 and January 2025 PSPS events and mutual aid efforts in response to the LA Fires, and report on any lessons learned	Pending
February 26, 2025	Provide an update on SDG&E's customer communications and notifications regarding field visits and routine work notifications	Pending

SDG&E expects to fulfill any pending recommendations at an upcoming Board Safety Committee meeting and will provide updates on their completion in future quarterly notifications.

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 November 1, 2024. 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 WSCAC met on February 7, 2025. At the meeting, SDG&E discussed the outcome of the General Rate Case Final Decision and the extreme weather events in January. SDG&E shared the communication enhancements it made based on the feedback received from school districts following the November and December 2024 PSPS events, including expanded twice daily Critical Facilities Briefings to include more two-way dialogue during PSPS events, as well as more detailed weather forecasts. SDG&E also opened up four additional Community Resource Centers providing food trucks with hot drinks during the event and provided five generators to the Mt. Empire School District. SDG&E shared the overall positive feedback from these programs, including how the generators allowed parents to go to work and children a warm place to stay, with warm meals and special educational programming. WSCAC members complimented SDG&E on its flexibility and noted the unique relationships between SDG&E and community partners that facilitated new efforts to support customer needs during the unprecedented event.

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/2026-2028-wildfire-mitigation-plan>).

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company