



Dan Skopec
Senior Vice President &
Chief Regulatory Officer
8330 Century Park Court, CP33A
San Diego, CA 92123-1530
DSkopec@sdge.com

December 2, 2025

VIA ELECTRONIC FILING

OEIS Docket # 2025-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 2025 Safety Certification Pursuant to Public Utilities Code Section 8389

Dear Program Manager Suzie Rose:

Pursuant to Public Utilities Code Section 8389(e)-(f), San Diego Gas & Electric Company (SDG&E or Company) hereby requests issuance of a safety certification for the upcoming 12 months.

The Office of Energy Infrastructure Safety (Energy Safety) approved SDG&E's 2024 Safety Certification Request on December 11, 2024.¹ "A safety certification is valid for 12 months following the issuance of the certification."² An electrical corporation must submit a request for a Safety Certification "before the expiration of a certification,"³ consistent with the schedule issued by Energy Safety each year.⁴ Public Utilities Code Section 8389(f)(2) requires that Energy Safety "shall issue a certification within 90 days

¹ 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 11, 2024 ("2024 Safety Certification Approval"). Available at <https://efiling.energy-safety.ca.gov/Search.aspx?docket=2024-SCs>

² Public Utilities Code Section 8389(f)(1).

³ Public Utilities Code Section 8389(f)(2).

⁴ *Office of Energy Infrastructure Safety's Safety Certification Guidelines* (Safety Certification Guidelines) (April 28, 2025) at 1-2, 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 8389.⁵

On April 28, 2025, Energy Safety issued its Final 2025 Safety Certification Guidelines (2025 Safety Certification Guidelines) establishing the process by which electrical corporations could request a safety certification for the upcoming year.⁶

Consistent with the 2025 Safety Certification Guidelines, this letter, the references cited, and the accompanying attachments comprise SDG&E’s documentation that it has satisfied the requirements of Public Utilities Code Section 8389(e) and Energy Safety’s guidance. Where applicable, SDG&E has noted the status of certain safety certification requirements that remain pending final approval by Energy Safety.⁷ SDG&E believes it will soon complete all safety certification requirements and will update this request upon receiving Energy Safety’s final approval of any necessary elements.⁸

1. Approved Wildfire Mitigation Plan – § 8389(e)(1)

On May 2, 2025, SDG&E submitted its three-year comprehensive 2026-2028 Base Wildfire Mitigation Plan (WMP).⁹ On November 25, 2025, Energy Safety issued a Draft Decision approving SDG&E’s 2026-2028 Base WMP.¹⁰ Based on this draft approval, SDG&E submits that its WMP will receive final approval in short order and will update its Safety Certification request at that time.

2. Good Standing and Safety Culture Assessment – § 8389(e)(2)

The 2025 Safety Certification Guidance established that “an electrical corporation can satisfy the ‘good standing’ requirement of Section 8389(e)(2) by agreeing to implement all of the findings (including recommendations for improvement) of its most recent safety culture assessment performed pursuant to Public Utilities Code Sections 8386.2 and 8389(d)(4), if applicable.”¹¹ SDG&E’s most recent safety culture

⁵ 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.”

⁶ *Safety Certification Guidelines*, OEIS Docket No Guidelines-SCs.

⁷ *Id.* at 2-3.

⁸ *Id.*

⁹ SDG&E’s 2026-2028 Base WMP. Available at <https://www.sdge.com/2026-2028-wildfire-mitigation-plan>

¹⁰ *Office of Energy Infrastructure Safety’s Draft Decision for San Diego Gas & Electric Company’s 2026-2028 Base Wildfire Mitigation Plan* (November 25, 2025). OEIS Docket No. 2026-2028-Base-WMPs.

¹¹ 2025 Safety Certification Guidelines at 3.

assessment was issued by Energy Safety on March 22, 2024.¹² On April 5, 2024, SDG&E notified Energy Safety of its agreement to implement the recommendations contained in the 2023 Safety Culture Assessment.¹³ SDG&E has further updated Energy Safety on the progress of the implementation of those recommendations in its Quarterly Notification Letters. SDG&E has therefore satisfied the requirements of Public Utilities Code Section 8389(e)(2).¹⁴

3. Safety Committee of Board of Directors – § 8389(e)(3)

The 2025 Safety Certification Guidelines address the Board Structure and governance requirements established by Public Utilities Code Sections 8389(e)(3) and (e)(5) and include a requirement that electrical corporations provide updates regarding their respective board safety committees. These requirements are addressed in turn.

a. SDG&E Board Safety Committee Members

The current members of the Safety Committee of SDG&E's Board of Directors are:

Robert J. Borthwick: Mr. Borthwick is the Chief Risk Officer for Sempra. His relevant safety experience includes 20 years working in the energy industry. He has held executive leadership roles in environmental health, safety, and compliance functions across energy infrastructure and renewable energy business segments.

Caroline A. Winn: Ms. Winn is the Executive Vice President for Sempra and Chair of the Board of Directors for SDG&E. She has more than 30 years of operational leadership experience. Ms. Winn has overseen executive roles in customer privacy, energy delivery and as the Chief Operating Officer and Chief Executive Officer of SDG&E. In prior roles, Ms. Winn was responsible for 24/7 operational safety and reliability of the transmission and distribution system in SDG&E's service territory as well as infrastructure planning to improve safety and reliability.

¹² 2023 Safety Culture Assessment for San Diego Gas & Electric Company, OEIS Docket No. 2023-SCAs (March 22, 2024).

¹³ Agreement of San Diego Gas & Electric to Implement the Findings of the 2023 Safety Culture Assessment Report. OEIS Docket No. 2023-SCAs (April 5, 2024).

¹⁴ SDG&E's 2024 Safety Culture Assessment remains pending at this time. While agreement to implement the recommendations of the 2023 Safety Culture Assessment fulfills the requirements of the Safety Certification, should SDG&E receive its 2024 Safety Culture Assessment while this Safety Certificate request remains pending, SDG&E will update its request to reflect as such.

Glen A. Donovan: Mr. Donovan is the Senior Vice President of Finance for Sempra. He has extensive financial experience in the energy industry, with wide-ranging knowledge of capital markets, mergers and acquisitions, treasury, and risk. His relevant safety experience includes analyzing safety history of potential partners or acquisition targets and supporting safety monitoring, statistical recording efforts, and corrective actions related to risk assessments.

Mr. Borthwick has served on the SDG&E Board Safety Committee since 2019. Ms. Winn joined the Safety Committee in 2021. Mr. Donovan joined the Safety Committee in 2025. Consistent with the 2025 Safety Certification Guidance, SDG&E has included detailed biographies of its Safety Committee members highlighting their relevant safety expertise and experience.¹⁵

Additionally, while not required by Public Utilities Code Section 8389(e), SDG&E notes that in 2019 the Company established a Community Wildfire Safety Advisory Council (“Community Advisory Council”) comprised of independent community members who possess extensive public safety and wildfire experience. The Community Advisory Council meets four times per year and provides input and guidance to the Safety Committee and the Company on safety matters. SDG&E reports on the activities of the Community Advisory Council in its Quarterly Notification Letters.

b. The Safety Committee’s Role in Overall Corporate Governance

The Safety Committee advises and assists SDG&E’s Board of Directors in the oversight of safely providing electric and natural gas services to the Company’s customers. The Safety Committee’s powers and responsibilities are delegated by the Company’s Board of Directors. As set forth in the Safety Committee Charter, those powers and responsibilities include overseeing SDG&E’s management of safety matters that affect the Company, its employees, contractors, customers, and the communities in which the Company operates. The Safety Committee also reviews the Company’s incentive compensation structure related to safety and the Company’s performance with respect to safety metrics. The Safety Committee regularly updates the SDG&E Board of Directors on safety matters addressed by the Committee and the Committee’s recommendations to the Company.

c. Significant Topics Covered by the Safety Committee Since the Issuance of the Last Safety Certification

SDG&E’s quarterly Board Safety Committee meetings include thoughtful and robust discussion of safety issues affecting the Company, including ongoing community and wildfire safety efforts. At each meeting, the Committee receives an update on the

¹⁵ See Attachment A. These biographies also note “safety-related education and experience for each safety committee member that is relevant to their role at the electrical corporation.” (Safety Certification Guidelines at 3-4).

Company's safety performance metrics to date, including both safety incidents as well as insightful "near miss" reports. These meetings are summarized and reported to Energy Safety and the Commission in SDG&E's Quarterly Notification Letters documenting the ongoing implementation of SDG&E's WMP pursuant to Public Utilities Code Section 8389(e)(7).¹⁶

The 2025 Safety Certification Guidance further requires SDG&E to provide a description of significant topics covered by the Safety Committee since the issuance of the last Safety Certification.¹⁷ Since SDG&E's last safety certification was granted, the Board Safety Committee has considered and recommended the following topics of significance:

- On May 22, 2025, the Committee visited two operational sites to observe safety measures and enhancements: a gas pipeline replacement and SDG&E's upgraded transmission facilities.
- On May 22, 2025, the Committee heard an update on lessons learned from the 2024 fire season and Public Safety Power Shutoff (PSPS) events, as well as mutual assistance efforts provided in response to the January Los Angeles wildfires.
- On May 22, 2025, the Committee heard an update on SDG&E's Risk Assessment Mitigation Phase (RAMP) submission to the California Public Utilities Commission (CPUC), including a discussion on changes to the cost-benefit ratio calculations.
- On July 31, 2025, the Committee was briefed on the Sample aviation incident affecting SDG&E's facilities, including emergency response and repair efforts.
- On October 15, 2025, the Committee was briefed on SDG&E's preparations for the 2026 CPUC Safety Culture Assessment, including updates on the process arising from the Safety Culture Assessment Rulemaking.
- On October 15, 2025, the Committee heard a presentation describing SDG&E's performance and accountability standards for contractors, including continuous monitoring of work and annual performance to promote safe operations. SDG&E reiterated its ongoing focus on the ultimate goal of every employee and contractor going home safely.

¹⁶ SDG&E's most recent quarterly notification to Energy Safety describing the actions and recommendations of the Board Safety Committee, as well as SDG&E's previous quarterly notifications pursuant to Public Utilities Code §8389(e)(7) are also available at SDG&E's WMP website, <https://www.sdge.com/2026-2028-wildfire-mitigation-plan>.

¹⁷ 2025 Safety Certificate Guidelines at 4.

- On October 15, 2025, the Committee heard a presentation addressing SDG&E's assessment of risk associated with its out of service transmission lines, and operational efforts to mitigate risk.

d. SDG&E's Implementation of the Recommendations of the Board Safety Committee Since the Issuance of the Last Safety Certification

The Board Safety Committee's recommendations to SDG&E are summarized in SDG&E's Quarterly Notification Letters submitted to Energy Safety and the Commission pursuant to Public Utilities Code Section 8389(e)(7). Committee recommendations and the actions SDG&E has taken in response to feedback from the Board Safety Committee since the issuance of the last Safety Certification include the following:

Recommendation	Status
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
Conduct a site visit to a wildfire hardening location	Completed April 16, 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
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
Report on contractor safety performance and contractor safety performance accountability	Completed October 15, 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	Completed May 22, 2025
Provide an update on SDG&E's customer communications and notifications regarding field visits and routine work notifications	Completed July 31, 2025
Provide an update on the upcoming CPUC Safety Culture Assessment Rulemaking and SDG&E's upcoming Safety Culture Assessment	Completed October 15, 2025

Recommendation	Status
Present on prevention of injuries related to falling from heights and lessons learned from any previous fall-related events (recommended July 31, 2025)	Pending
Present on risks associated with out-of-service transmission lines in the High Fire Threat District (HFTD)	Completed on October 15, 2025
Provide an update on efforts to monitor and improve driving safety (recommended October 15, 2025)	Pending
Provide an update on telematics in company vehicles (recommended (October 15, 2025)	Pending

As discussed above, SDG&E's Board Safety Committee and its efforts at safety governance at the Company meet the requirements of Public Utilities Code Section 8389(e)(3).

4. Executive Incentive Compensation Structure – § 8389(e)(4)

On May 23, 2025, SDG&E submitted a letter to Energy Safety documenting its compliance with the executive compensation provisions of Public Utilities Code Sections 8389(e)(4) and (e)(6). SDG&E will update its safety certification request upon approval of its executive compensation structure.

5. Board-of-Director-Level Reporting to the Commission on Safety Issues – § 8389(e)(5)

On August 19, 2025, the Commission, in collaboration with Energy Safety, California Department of Forestry and Fire Protection (CAL FIRE), and the California Governor's Office of Emergency Services (Cal OES) hosted a Public Meeting on Utility Safety Culture and Public Safety Power Shutoffs (PSPS), during which representatives from SDG&E and other utilities presented on safety and PSPS issues and answered questions from Commissioners, the Director of Energy Safety, and the rest of the dais.¹⁸ SDG&E was represented by Robert Borthwick, Chief Risk Officer at Sempra Energy and Chair of the SDG&E Board Safety Committee, Kevin Geraghty, SDG&E Chief

¹⁸ Pursuant to the 2025 Safety Certification Guidelines, Energy Safety has instructed electrical corporations to provide any materials used or referenced in the public meeting in their Safety Certification requests to demonstrate that the electrical corporation has met this requirement. SDG&E's presentation is available on its website at <https://www.sdge.com/2026-2028-wildfire-mitigation-plan>. The recording of the public meeting is also available on the Commission's website at <https://www.adminmonitor.com/ca/cpuc/workshop/20250819/>.

Operating Officer and Chief Safety Officer, and Jonathan Woldemariam, SDG&E Director of Wildfire Mitigation.

Consistent with the 2025 Safety Certification Guidance, SDG&E has met the requirements of Public Utilities Code Section 8389(e)(5) regarding Board of Director level reporting on safety issues.

6. Compensation Structure for Executive Officers – § 8389(e)(6)

See response to item 4 above.

7. Implementation of Approved Wildfire Mitigation Plan, Safety Culture Assessment, and Safety Committee Recommendations Quarterly Advice Letters – § 8389(e)(7)

Since receiving its safety certification, SDG&E has continued to submit Quarterly Notification Letters to Energy Safety as required by Public Utilities Code Section 8389(e)(7).¹⁹ These include:

SDG&E Q4 2024 Quarterly Notification Letter (February 1, 2025);²⁰

SDG&E Q1 2025 Quarterly Notification Letter (May 1, 2025);²¹

SDG&E Q2 2025 Quarterly Notification Letter (August 1, 2025).²²

SDG&E Q3 2025 Quarterly Notification Letter (November 3, 2025).²³

Each submission complies with statutory requirements because it (1) details the implementation of the approved WMP and most recent safety culture assessment; (2) contains a statement of the recommendations of the Board of Directors' Safety Committee meetings that occurred during the quarter; and (3) summarizes the Company's implementation of the Safety Committee's recommendations.

¹⁹ When Energy Safety transitioned to the Department of Natural Resources, Public Utilities Code Section 8389(e)(7) was amended to change the quarterly advice letter requirement to a notification to Energy Safety, with an information-only submission to the Commission.

²⁰ The Quarterly Notification Letters are available for review on SDG&E's website, at <https://www.sdge.com/2025-wildfire-mitigation-plan> and <https://www.sdge.com/2026-2028-wildfire-mitigation-plan>.

²¹ May 1, 2025 Quarterly Notification Letter, *supra*.

²² August 1, 2025 Quarterly Notification Letter, *supra*.

²³ November 3, 2025 Quarterly Notification Letter, *supra*.

a. Implementation of SDG&E's WMP

The 2025 Safety Certification Guidance also requires that the electrical corporation “detail the progress it has made toward completing its WMP targets, explain any delayed or off-track efforts.”²⁴ SDG&E continues to track 41 quantitative targets proposed in its 2023-2025 Base WMP that are designed to mitigate the risk due to a fault on the electric system and reduce the impacts of PSPS to customers. SDG&E’s detailed quarterly submissions demonstrate its on-time and on-target progress toward the majority of its 2023-2023 WMP targets. SDG&E’s most recent Quarterly Notification provides information on 2025 target completion through the end of the third quarter. As of that date, 18 programs have achieved their target, and 21 programs are in progress.

The following 2 programs are experiencing delays: Hotline Clamps and PSPS Sectionalizing Enhancements. Details on each of these programs are discussed below.

Hotline Clamps

SDG&E requested to implement strategic scope changes in 2025 for 12 initiatives in its Petition to Amend filed with Energy Safety on April 11, 2025. Energy Safety rejected six of the requests on July 11, 2025 noting that the request did not meet requirements in Chapter IV of the WMP Guidelines nor demonstrate good cause for the change. SDG&E acknowledges that one program, Hotline Clamps, was denied under the Petition to Amend and therefore is off track in meeting the original target established in SDG&E’s 2023–2025 Base WMP. Installation of hotline clamps in 2023 and 2024 was scoped through high-volume deployment of assets, which exhausted the need for an additional 950 units, thus driving the 2025 Petition to Amend request. The request to reduce the 2025 target to 100 was made in order to strategically deploy these assets covered conductors as part of the Corrective Maintenance Program. As of the Q3 Quarterly Data Report, 107 hotline clamps have been installed. Though the 2025 target of installation of 950 hotline clamps will not be met, the cumulative three-year target total of installation of 1,450 hotline clamps presented in the 2023-2025 Base WMP was exceeded at the end of the third quarter, with installations totaling 1,747 hotline clamps, and achieves the intended risk reduction.

PSPS Sectionalizing Enhancements

SDG&E will not achieve its target to install 10 sectionalizing switches in 2025. After additional analysis was conducted on scoped installation locations, it was determined that one of the scoped switches would not provide additional PSPS benefit and therefore it was descope and removed from the schedule. As of the Q3 Quarterly

²⁴ 2025 Safety Certification Guidance at 5.

Data Report, four switches have been installed. SDG&E expects an additional five units to be completed by year-end 2025.

b. Implementation of Safety Culture Assessment Recommendations

Consistent with Public Utilities Code Section 8389(e)(7), SDG&E's Quarterly Notification Letters to Energy Safety update stakeholders regarding the Company's implementation of the recommendations of its most recent safety culture assessment.²⁵ SDG&E agreed to implement its most recent Safety Culture Assessment recommendations in April of 2024 and no new Safety Culture Assessment recommendations have been issued from Energy Safety.²⁶ The following represents an update of implementation to date. Progress on these recommendations is ongoing and SDG&E will continue to provide updates in its Quarterly Notification Letters to Energy Safety.

Safety, including but not limited to wildfire and public safety, is a Company core value. SDG&E recognizes the importance of organizational culture and how it contributes to safety performance. SDG&E's organizational safety culture, driven by leadership commitment, two-way communication, and employee engagement, leads to a proactive approach to risk identification and mitigation. To highlight its efforts to implement the recommendations of its 2023 Safety Culture Assessment Report, issued March 22, 2024, SDG&E has performed the following:

2023 Safety Culture Assessment Report Recommendation: SDG&E should develop and implement actions to reduce perceived performance pressure and distractions. Leaders at SDG&E should consistently demonstrate to workers that safety is the top priority through words, decision making, and actions, especially as it pertains to distractions and perceived pressures to perform.

Ongoing efforts to implement this recommendation include:

- Executive Safety Council dialogue sessions - SDG&E's Executive Safety Council serves as the centralized governing body for all safety committees, programs, and processes. Comprised of cross-functional leadership, the Council meets quarterly, rotating across SDG&E districts, to hear directly from employees (front-line and supervision) 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.

²⁵ The Quarterly Notification Letters are available for review on SDG&E's website, at <https://www.sdge.com/2025-wildfire-mitigation-plan> and <https://www.sdge.com/2026-2028-wildfire-mitigation-plan>.

²⁶ Energy Safety's 2024 Safety Culture Assessment for San Diego Gas & Electric Company has not been issued as of the date of this Safety Certification Request.

- Weekly leadership safety messages - SDG&E's Chief Safety Officer and rotating Executive Officers issue weekly safety messages to all employees via e-mail. These messages highlight key safety messages, weekly safety performance, teachings, and reminders from recent safety incidents, and reinforce SDG&E leadership's commitment to safety and learning.
- Quarterly Business Updates – SDG&E hosts Quarterly Business Updates where executives provide information and updates on Company initiatives and answer questions from attendees. All employees are invited to attend these town hall-style events with both in-person and virtual attendance options provided.
- Annual Safety Congress and Award Ceremony - In September, SDG&E held its 24th annual Safety Committee Congress and Wellness Fair with over 65 exhibitors showcasing safety and wellness practices, demonstrations, and participation from various safety committees and partners. This annual event recognizes SDG&E's numerous Safety Committees for their efforts to advance safety throughout the year. This year's theme of "Safety: Above and Beyond," honored outstanding individuals and teams that champion safety to the highest levels. The event also included SDG&E's Annual Safety Leadership Awards ceremony, recognizing individuals and teams with exceptional safety contributions across the organization.
- Annual Contractor Safety Summit - On July 23, SDG&E held its 12th Annual Contractor Safety Summit, attended by approximately 250 contractor partners and members of SDG&E leadership. The event focused on workforce and public safety initiatives, featuring a panel discussion and presentation dedicated to preventing serious injuries and fatalities through increased high-energy exposure awareness.
- Annual Start Strong Safety Event – Historically, SDG&E sees an uptick in safety incidents at the start of each year. To address this, starting in 2023, SDG&E established an annual Start Strong offsite safety event that gathers over 75% of its field labor workforce to reinforce key safety messaging and spread awareness of available resources. In February 2025 (rescheduled from January due to PSPS events), approximately 1,200 field and represented workforce were transported to an offsite conference facility for a half day event focused on safety. SDG&E executives demonstrated their leadership commitment to continually advancing our safety performance and safety culture by identifying available resources to help employees be mentally and physically fit to safely perform work.
- Fire Season Readiness – In September 2025, SDG&E convened top emergency response officials and community partners at its Wildfire and Climate Resilience Center to reinforce wildfire readiness, mark a mid-season mobilization, and present a unified call to action for year-round vigilance and collaboration. Officials

reflected on the extraordinary circumstances of last year's wildfire season, when the region experienced record-setting wind speeds and critically dry conditions - a combination that underscored the importance of wildfire prevention measures and regional coordination. Representatives from CAL FIRE, San Diego Fire-Rescue, and 2-1-1 San Diego joined SDG&E leadership to highlight the region's coordinated approach to wildfire readiness. The event showcased innovative technology, including virtual fire simulations and AI-powered situational awareness tools.

2023 Safety Culture Assessment Report Recommendation: SDG&E should continue to act on the 2022 recommendation to build on its efforts to track trends in safety event-related reporting, specifically tracking the quality of near-miss investigations and continuing to develop its Ignition Management Program.

Ongoing efforts to implement this recommendation include:

- Safety Dashboard - SDG&E continually deploys enhancements to its company-wide Safety Dashboard, accessible to all SDG&E employees, to increase data analytic functionality of leading and lagging safety metrics. In 2025, enhancements included increased data analysis of high energy hazards and serious injury or fatality potential incidents.
- Near Miss Reports - SDG&E tracks several qualitative and qualitative metrics related to Near Miss reporting, including percentage of anonymous and named reports, status of submitted reports with actionable follow-up, serious injury or fatality potential, and category of reports. In 2025, SDG&E continued issuance of a Weekly Near Miss Summary Report. This report is sent to all SDG&E employees and provides high level data analysis to identify trends and highlights follow-up action items, safety reminders, and key teachings. The Weekly Near Miss Summary Report aims to recognize employees for speaking-up and highlight resulting safety improvements to encourage reporting. In 2025, SDG&E's Near Miss dashboard was updated to allow better analysis of anonymous versus non-anonymous reports, supporting the identification of potential areas for improvement. YTD 2025, SDG&E has achieved its highest rate (56%) of non-anonymous Near Miss reporting that include the submitter's name demonstrating successful efforts in building trust and psychological safety.
- Ignition Management Program – SDG&E's Ignition Management Program continues to utilize the evidence of heat report to capture data for Energy Safety 29300 (Cal. Code Regs. tit. 14 § 29300) and CPUC ignition reports. For improved situational awareness, Fire Coordination receives notification from Service Dispatch on all SDG&E resource requests related to a response of emergency services for a possible fire and follows up on all reports to determine the status of the incident. Processes are continuously reviewed regarding the efficiency of reporting incidents that meet regulatory requirements and documentation of potential fire ignitions. The Evidence of Heat and Ignition data

informs wildfire risk analysis. In 2024 and 2025, SDG&E performed a review of the Ignition Management Program. This included 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 reviewed the outcomes of that review process and implemented recommendations to promote additional efficiencies and opportunities to improve reporting processes. As of July 2025, all of the recommendations for improvements have been implemented.

2023 Safety Culture Assessment Report Recommendation: SDG&E should continue to recognize and take action to mitigate the risk exposure posed by interactions with the public.

Ongoing efforts to implement this recommendation include:

- Stop Work Authority - SDG&E leadership continues to emphasize that all employees and contractors are empowered to “Stop the Job” if an unsafe situation is perceived. Instances of stopped work are often recognized and shared in monthly safety subcommittee meetings and weekly near miss summary reports.

Customer Awareness and Notification - SDG&E operational teams continue to deploy training and messaging regarding safe interactions with members of the public. SDG&E external communication teams continue to deliver public educational messaging leveraging numerous communication platforms to raise greater awareness and remind members of the public that SDG&E employees may be on their property performing work to maintain safety and reliability. In 2025, SDG&E continued its Advance Customer Notification efforts, which inform customers of work scheduled in their area and include a link to a website that describes the type of work as well as a video showing customers what to expect. These courtesy text and email messages were successfully deployed as an initial pilot program in October 2024 to enhance customer experience and employee safety in the field and continue to expand to work groups company-wide.

- Community Education & Outreach – In 2025, SDG&E held its 7th Annual Wildfire Safety Fair Series. In total, five Wildfire Safety Fairs were held across SDG&E’s service territory in Ramona, Rancho Bernardo, Alpine, Valley Center, and Vista. These public outreach events are a vital community resource, offering residents tools and education to stay safe, prepared, and resilient during wildfire season. In addition to the five Wildfire Safety Fairs, SDG&E teams extended their outreach by hosting several mini-fairs throughout the service territory. These smaller events took place in Mission Valley, Chula Vista, and tribal communities, further amplifying safety messages and deepening engagement with local residents. By collaborating closely with community partners at these mini-fairs, SDG&E was able to provide even more residents with vital information and resources,

reinforcing the importance of wildfire preparedness across diverse neighborhoods.

- **Energization Process Improvements** – In 2025, SDG&E deployed improvements to its energization process to help simplify the customer journey by providing easy-to-find information, details on next steps, and progress tracking. Through these changes, SDG&E's aims to improve customer satisfaction and enable residential and commercial customers to start using their electrical services with minimal delays. This effort aims to reduce the frequency of customers circumventing SDG&E procedures and altering equipment prior to SDG&E's onsite visit, improving public and employee safety
- **Field Technology** - 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 the opportunity for crews to include prerequisite and post completion notes.

2023 Safety Culture Assessment Report Recommendation: SDG&E should increase engagement on the safety culture assessment within the workforce supporting wildfire mitigation initiatives

Ongoing efforts to implement this recommendation include:

- **Psychological Safety** - SDG&E continually works to promote a speak-up culture, enhance psychological safety, and increase engagement across its employee and contractor workforce. In 2025, SDG&E's President held numerous listening sessions across various worksites to reinforce our leadership commitment and continually advance these efforts.
- **Contractor Outreach** – SDG&E continues to increase awareness of safety culture initiatives and continues to promote alignment during Contractor Safety Quarterly Meetings and Annual Contractor Safety Summits.
- **Listening Sessions** – SDG&E hosts wildfire "Double Down" and "Challenge" listening sessions to solicit input from cross-functional employees on efforts to advance wildfire mitigation initiatives.
- **Tools & Resources** – In advance of its 2024 assessment, SDG&E worked to identify additional tools and resources to promote increased survey participation.

- Leadership Messaging - 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.
- Employee Participation - 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. SDG&E is currently awaiting issuance of its 2024 Safety Culture Assessment Report.

SDG&E thus meets Energy Safety's requirement to demonstrate progress in implementing the findings of its most recent safety cultures assessment and has established that it has met the statutory requirement of Public Utilities Code Section 8389(e)(7).

December 2, 2025

Page 16

In conclusion, SDG&E meets the requirements of Public Utilities Code Section 8389(e). Accordingly, SDG&E respectfully requests that you expeditiously issue it a 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

Attachments

Attachment A – SDG&E Board Safety Committee Resumes

ATTACHMENT A

SDG&E Board Safety Committee Resumes

***Robert Borthwick
Caroline A. Winn
Glen A. Donovan***

Robert Borthwick – SDG&E Safety Committee Chair

Mr. Borthwick has served in various capacities at Sempra over the last 20 years. He currently serves as Sempra's Chief Risk Officer as well as its chief compliance officer and chief sustainability officer. In addition to enterprise risk management, compliance and sustainability, his responsibilities include emergency management, physical security and cybersecurity. He previously served as Deputy General Counsel for Sempra and before that the general manager of Sempra Renewables, leading all aspects of Sempra's renewable energy subsidiary, including commercial development, finance and operations, as well as supporting the sale of its U.S. wind and solar assets. He was also vice president and general counsel at Sempra Infrastructure, LLC, where he led the legal, environmental, health and safety, regulatory, human resources and external affairs groups supporting both Sempra Renewables and Sempra LNG. He also served as vice president and general counsel for Sempra U.S. Gas & Power, and associate general counsel for Sempra Energy. He completed OSHA's 10-hour safety training course in 2019 and again in 2024.

Selected safety-related responsibilities:

Sempra Energy (2003-2012) Mr. Borthwick worked extensively on San Diego Gas & Electric's litigation arising out of three 2007 wildfires, specifically the Witch, Guejito, and Rice fires. He provided advice on changes and enhancements to SDGE's inspection and fire prevention procedures.

Sempra U.S. Gas & Power/Sempra Infrastructure (2013-2018) Mr. Borthwick led a number of teams at Sempra U.S. Gas & Power and Sempra Infrastructure, including the environmental, health and safety (EHS) permitting and compliance functions. Safety practices included assigning a safety monitor to all major construction projects, establishing guidelines for qualified electrical worker designations, implementing a contractor safety screening process requiring contractors to meet safety metrics prior to submitting bids, establishing new minimum requirements for contractors performing critical lifts, and increasing the sharing of safety enhancements and lessons learned between plants and with industry groups. Mr. Borthwick led compliance committees for both companies and oversaw their annual risk assessments. Mr. Borthwick also served on the board of directors of two regulated public utilities, Mobile Gas in Alabama and Willmut Gas in Mississippi, from 2013 to 2016. In these board roles, he provided oversight on a variety of employee and public safety issues.

Sempra Renewables (2018-2019) As the General Manager for Sempra Renewables, Mr. Borthwick was responsible for operations, including health and safety. Sempra Renewables was a leader in safety compliance, conducting semi-annual safety summits to introduce new programs and share best practices, introducing a program to cross-train plant employees by having them lead semi-annual safety and environmental performance inspections at sister plants with support from safety and environmental

professionals, and implementing a telemedicine service for employees at remote operating plants to provide better access to health care services. The Copper Mountain Solar complex in Nevada and the Mesquite Solar complex in Arizona were the first solar generation facilities in the United States to receive OSHA's VPP (Voluntary Protection Program) certifications.

Sempra Energy

(2019-present) As Deputy General Counsel, Mr. Borthwick's responsibilities included overseeing Sempra's compliance program and coordinating on compliance issues with its operating companies in California, Texas, Mexico, Peru, and Chile. He served as vice chairman of the board of directors of Luz del Sur (luzdelsur.com.pe/en), the largest electric company in Peru, from March 2019 to April 2020, when Sempra sold its interest in the company. Mr. Borthwick led Sempra's efforts to create and implement annual Safety Summits beginning in 2019 that bring together leaders from across the Sempra family of companies to discuss best practices and advance safety culture from a corporate governance perspective. He achieved the Certified Compliance & Ethics Professional (CCEP) certification from the Compliance Certification Board in October 2021. Further, he attained a Directorship Certification from the National Association of Corporate Directors (NACD) in December 2022, which included training on how to appropriately oversee risk management and safety from a corporate governance perspective.

In May 2023, Mr. Borthwick became Sempra's Chief Risk Officer. His responsibilities include enterprise risk management, safety, emergency management, compliance, physical security and cybersecurity. He continues to lead Sempra's annual Safety Summits attended by leaders from all of Sempra's operating companies. He also leads Sempra's safety culture initiatives focused on Sempra's leadership and employee behaviors and actions that impact the safety cultures across the enterprise. In July 2025, Mr. Borthwick became Sempra's chief sustainability officer.

Caroline A. Winn – SDG&E Safety Committee Member

Ms. Winn is Executive Vice President for Sempra – overseeing Sempra California utilities SDG&E and SoCalGas. Winn is also chair of the board of directors for both companies. She has more than 30 years of experience in power engineering, construction and operation of natural gas and electric systems and customer service. Her previous roles at SDG&E included: Director of Transmission and Distribution Asset Management and Smart Grid; Director of Supply Management; Vice President and Chief Customer Privacy Officer; Chief Energy Delivery Officer; Chief Operating Officer and Chief Executive Officer. In this latter role, under her leadership SDG&E became widely recognized as an industry leader in wildfire safety innovations and climate adaptation.

Selected safety-related responsibilities:

Director of Transmission and Distribution Asset Management and Smart Grid (2007-2009)

Ms. Winn was responsible for the 24/7 operational safety and reliability of the transmission and distribution system in SDG&E's service territory, infrastructure planning to meet growing and changing needs, as well as implementation of smart grid technologies to improve safety and reliability.

Director of Supply Management (2009-2010)

Ms. Winn managed the supply chain to support one of largest construction booms in the history of SDG&E and SoCalGas. She oversaw \$1 billion in procurement and logistics of materials and services.

Vice President and Chief Customer Privacy Officer (2010-2015)

Ms. Winn mobilized a first-of-its-kind taskforce dedicated exclusively to address and resolve gas infrastructure leaks around the clock, lowering response time from an average of 120 minutes to 30 minutes. She led the development of a Behavior-Based Safety Program for Customer Service Field Technicians, which was also adopted by Electric Operations, and had direct responsibility for customer service field employees who ensure customers' homes are safe from a gas delivery perspective. Under her leadership, SDG&E also executed a full-scale transformation of the customer services organization, driving a paradigm shift in the way the company viewed, interacted and valued customers.

Chief Energy Delivery Officer (2015-2016)

Ms. Winn was responsible for safe and reliable delivery of both natural gas and electricity to customers. In addition, she oversaw customer services, and external and state legislative affairs.

Chief Operating Officer (2017-2020)

Ms. Winn was the prime architect of SDG&E's wildfire safety innovations and operating protocols during extreme weather events. Under her leadership, SDG&E undertook numerous fire hardening projects and implemented a suite of situational awareness

tools, including a dense network of weather stations, high-definition, live-streaming cameras that allow first responders to detect smoke and fires, and fire weather forecast prediction and forecast models. She was responsible for the company's compliance and adherence to its Wildfire Mitigation Plan.

Chief Executive Officer (2020-2025)

Ms. Winn served as the executive sponsor of the company's Behavior-Based Safety Program, which included leading indicators and identification of safe and at-risk behaviors. Other key endeavors to improve public, employee and contractor safety include:

- Established a contractor safety oversight organization, which engages a third-party administrator to ensure consistent qualifications, reporting of accidents and contractor accountability.
- Increased field supervision job safety observations. In 2024, there were 21,272 safety observations and 1,857 driving observations. Field safety engagements were introduced to focus on preventing serious injuries and fatalities during high-energy tasks.
- Enhanced safety communications to include timely reporting of near misses and sharing of lessons learned across the organization. SDG&E launched an app in 2020 to make it easier for employees to report near misses and continues to improve the means for employees to proactively speak up regarding safety issues.
- Sponsored an enterprise-wide Safety Management System (SMS) and established the Chief Safety Officer role to promote psychological safety and reduce injuries. Within its SMS, in 2024 SDG&E:
 - Achieved its safest year on record with a year-end Occupational Safety and Health Administration (OSHA) rate of 1.28 and Lost Time Incident (LTI) rate of 0.32, a testament to her leadership commitment to building a strong safety culture.
 - Recorded the highest number of Near Miss reports submitted on record with 447 employee- and 257 contractor-submitted Near Misses and Good Catches. Together, equaling 704 opportunities to listen, learn, deploy safety improvements and build trust and psychological safety.
 - Became the first utility to achieve Cal/OSHA Voluntary Protection Program (VPP) certification for Transmission & Substation Operations at its Kearny facility.

Executive Vice President for Sempra and Chair of the Board of Directors for SDG&E (2025-Present)

Ms. Winn continues to make safety a top priority, creating a workplace where employees actively look out for each other and are encouraged to speak up about risks and vulnerabilities they observe in their everyday work environments, be it in the field or office. Ms. Winn is a champion of fostering psychological safety – taking away fears of humiliation, rejection and punishment for speaking up.

Glen A. Donovan – SDG&E Safety Committee Member

Mr. Donovan has served in various leadership capacities at Sempra for over 25 years. He currently serves as Sempra's Senior Vice President of Finance. In this role, he oversees Sempra's Treasury and Corporate Planning activities. Mr. Donovan's responsibilities most recently included overseeing Sempra's Investor Relations function. Mr. Donovan was previously Vice President, Development for Sempra Infrastructure. Prior to that he led the finance and accounting groups at Sempra Infrastructure. At Sempra Renewables, Mr. Donovan was responsible for Structuring and Asset Management. There he led the sale of its U.S. wind and solar assets. Prior to this experience Mr. Donovan held various financial leadership roles at Sempra. Mr. Donovan has extensive financial experience in the energy industry, with wide-ranging knowledge of capital markets, mergers and acquisitions, treasury and risk.

Selected safety-related responsibilities:

Sempra Energy (2000-2010) Mr. Donovan worked in several finance roles. Supporting mergers and acquisitions, Mr. Donovan would analyze safety history of potential partners or acquisition targets. Mr. Donovan would also support enterprise risk assessments.

Sempra U.S. Gas & Power/Sempra Renewables (2010-2019) Mr. Donovan led a number of teams at Sempra U.S. Gas & Power and Sempra Renewables. As a board member for all the Renewable Joint Ventures, Mr. Donovan was responsible for the business' safety record and analyzing and making safety improvement recommendations. As head of Project Finance and Mergers and Acquisitions, Mr. Donovan was responsible for assuring the safety records of potential engineering, procurement and construction firms and potential partners and projects. In these roles, Mr. Donovan participated in several project safety summits. Mr. Donovan participated in several risk assessments for his areas of leadership. As head of Asset Management, Mr. Donovan supported the safety monitoring, statistical recording efforts and corrective actions.

Sempra Infrastructure/Sempra LNG (2019-2022) Mr. Donovan led the finance and accounting groups as well as the development teams for both Sempra LNG and Low Carbon Solutions. As head of finance, Mr. Donovan led several project financing efforts where safety programs and sustainability were a key element to reach funding. As head of development, Mr. Donovan was involved in the overall safety program at Sempra LNG and Low Carbon Solutions. The safety program included best practice reviews with many of Sempra LNG's worldwide partners and stakeholders as well as site visits with a focus on safety culture.

Sempra

(2022-present) As Senior Vice President of Finance, Mr. Donovan participates in the safety review for Sempra's capital allocation exercises. In his role he supports enterprise risk review and mitigation.