



SDG&E Emergency and Disaster Preparedness Plan

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PUBLIC VERSION



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The Emergency Management director and VP Wildfire and Climate Science signatures below indicate they have reviewed, accepted, and recommend this Company Emergency and Disaster Preparedness Plan for senior executive leadership CEO approval. It is acknowledged the plan will be exercised and modified as processes or procedures change as requested by executive leadership, and or emergency management. It will also be modified as regulatory, or compliance requirements change.

[Redacted Signature]

Thom Porter,
EM Dir

[Redacted Signature]

Date

[Redacted Signature]

Brian D'Agostino, VP
WCS

[Redacted Signature]

Date

1 Introductory Material - Basic Plan

1.1 Foreword

This Company Emergency and Disaster Preparedness Plan (CEADPP) was developed for San Diego Gas & Electric, (SDG&E) in cooperation with each of its business units and in alignment with Sempra Corporate Emergency Response Plan. Per CPUC GO 166 requirements, this CEADPP was developed using FEMA's Comprehensive Preparedness Guide Volume 2.0., Cal OES EOP Crosswalk, and vetted in collaboration meetings with Orange County governments, Cal OES San Diego Operational Area governments, AFN-CBOs, and San Diego County Tribal Governments. The CEADPP consists of a basic plan, related attachments, hazard specific annexes, functional annexes, and appendixes for additional support information to the emergency plan.

The basic plan contains the following sections:

- Basic Plan-Purpose Scope, Situational Objectives and Assumptions, Page 12
- Emergency Management and Guiding Principles, Page 18
- Concept of Operations, Page Concept of Operations Page 21
- Organization and Assignment of Responsibilities, Page 41
- Direction, Control and Coordination, Page 44
- Communications, Page 60
- Administration and Finance, Page 67
- Plan Development and Maintenance, Page 69
- Authorities and References, Page 71

1.2 Letter of Approval and Promulgation

To All SDG&E Employees and Contractors:

Transmitted herewith is the Company Emergency and Disaster Preparedness Plan (CEADPP) for SDG&E. This plan supersedes any previous plan(s) promulgated for this purpose. It provides a framework for the Company to use in performing emergency functions before, during, and after an emergency incident, natural disaster, or technological incident.

This CEADPP supports the company's ability to prevent, prepare for, respond to, and recover from incidents regardless of cause, size, or complexity effectively and efficiently. This document has been formatted and updated to resemble the structural framework recommended in the Federal Emergency Management Agency's Comprehensive Preparedness Guide (CPG) and builds upon concepts establishing in the National Response Framework (NRF) and the National Incident Management System (NIMS) providing a consistent template for managing incidents of any hazard. It also meets California Public Utility Commission's General Order No. 166 standard and California Standardized Emergency Management System (SEMS Code 8607) which is meant to ensure electric utilities are prepared for emergencies, interagency collaboration, and disasters.

SDG&E's Emergency Management (EM) is responsible for the development and maintenance of this CEADPP. This plan is intended to comply with applicable Federal, State, and local statutes. It will be tested, revised, and updated as required. All recipients are requested to advise EM regarding recommendations for improvement.

This plan is hereby approved and released to all Boards, Departments and Offices of SDG&E by order of

Caroline Winn, CEO SDGE

Date

1.3 Implementation

SDG&E's mission is to "Improve lives and communities by building the cleanest, safest and most reliable energy infrastructure company in America". To achieve this mission, SDG&E must engage in proactive preparedness and active response-recovery planning efforts to provide staff with the means to effectively manage any hazard that the company may encounter.

The CEADPP provides planning guidance for responding effectively to and preparation in anticipation of a risk hazard or Public Safety Power Shutdown (PSPS) incident. The CEADPP is intended to provide SDG&E personnel and other readers with the tools to meet or exceed stakeholder expectations, maintain electric & gas reliability, and safeguard the company's brand. The severity and possible consequences of an incident cannot be predicted fully, so effective planning serves to minimize the impact on the company, its customers, stakeholders, and reputation and provide the guidance to successfully manage a non-predicted event.

This CEADPP applies to all SDG&E personnel. Every employee supporting a response must understand and appreciate their role, and those of others, for the successful execution of processes in response to an incident. To facilitate this requirement, the company will educate personnel to this plan and exercise the plan through table-top exercises and functional exercises at a minimum of a yearly basis or whenever the plan undergoes changes that will modify the response protocols.

The EM staff will determine when such training is necessary and coordinate the training and exercise functions, maintain document revision control, and coordinate any role and responsibility changes with the appropriate company departments.

The CEADPP incorporates SDG&E's values to demonstrate its commitment to employees and customers. These values are:

Do the right thing. Champion people. Shape the future.

1.4 Privacy Statement

The information in this document is classified as Internal and should be treated, stored, and maintained in accordance with the requirements outlined in the Information Security Policy. Emergency operation plans or some components are generally shared with government and community partners as the need for coordinated collaborative response needs arise. The document will be screened by the EM Director, Legal department and senior company officials as needed to determine what components should be exempted from being shared.

The CEADPP contains information that may raise personal privacy concerns, and, as a result, those portions may be exempt from mandatory disclosure under the Freedom of Information Act. As such, neither the CEADPP nor any sections thereof shall be released outside of SDG&E without prior written approval from the Director of Emergency Services or designee and the Legal Department. In addition, disclosure of information contained in the CEADPP could jeopardize the security of the company or otherwise impair its ability to carry out essential functions.

1.5 Record of Changes

In accordance with the guidelines outlined in Section 8, Plan Development and Maintenance, this plan will be reviewed annually and updated every three to five years, updates will also include review of lessons learned and new or updated regulatory requirements. All change requests should be submitted to the SDG&E EM department. Major revisions will be documented below.

Date Reviewed	Reviewer Name	Revised Pages	Updated due to lesson learned or regulatory requirements Y/N	Notes
12-28-2021	Freels, Hinrichs, Ehlke	1,5, 9, 15, 35, 46, 47	Y, CPUC GO 166 and EMAP	Name and key wording inclusion requirement to some sections
9-1-2022	Freels, Hinrichs	See update appendix E this date	Org chart changes, COL approved plan update	
3-2023	MFreels, RHinrichs	CPUC yearly update, Conformance GO 166. See appendix E revisions this date	All reviewed with Community partners	Orange Co. Gov, Cal OES SD OA, AFN -CBOs, Tribal Gov SD
3/2024	RHinrichs, EM Plans			

1.6 Record of Distribution

This form documents the CEADPP release to distribution entities. The receiver's identification information is listed and maintained with the release history for internal document records. This document can be released through electronic distribution systems including email or posted document management website or company mail system.

Date Released via distribution type or copies	Receiver Name	Title	Department
3/2023	Company wide	CEADPP rev 3-2023	All Departments
3/2024	Company Wide	CEADPP rev 3-2024 Appendix E	All Departments

2 Basic Plan-Purpose, Scope, Situational Objectives and Assumption

2.1 Purpose

This CEADPP is to ensure that SDG&E's processes and procedures are established for emergencies and disasters to minimize response times and provide for effective response and communications with the public during those emergencies and disasters.

The SDG&E CEADPP addresses emergency preparedness, crisis management, and business resumption planning to provide for the safety of employees, contractors, customers, the public and protection of property in the event of an incident affecting SDG&E employees, contractors, customers, or other stakeholders.

The purpose of the CEADPP is to provide an all-hazards strategic framework that SDG&E personnel may rely upon to respond effectively using the Incident Command System (ICS) and National Incident Management System (NIMS) required by federal and state SEMS mandates.

The CEADPP may be activated during business and after hours, both with and without warning. The foundation of this plan utilizes existing company work structure and responsibilities to minimize specialized training to the plan's preparedness and response procedures. It relies on the changes to normal organizational leadership structure during an emergency activation in the CEADPP into an ICS-NIMS incident management structure to maintain chain of command and span of control principles for crisis management required in the NIMS protocols. CEADPP is compliant with the SEMS utility collaboration components for the 5 Levels of Operational Area Mutual Assistance resource response support requirements.

Utilizing the 14 NIMS management principles (Common Terminology, Chain of Command, Unity of Command, Span of Control etc.) that SDG&E has adopted, the CEADPP provides a framework by which SDG&E can respond effectively, as a company, to any threat or hazard it may face. Reliance on the guidance, processes, checklists, and other job aids found in the CEADPP will help minimize response times and provide for effective response and communications with the public and SDG&E's stakeholders during an incident.

This plan has been developed, updated, and maintained in compliance with California Public Utilities Commission (CPUC) General Order 166 as modified by Decisions (D.) 98-07-097, D.00-05-022, D.12-01-032 and D.14-05-020. Reference Section 1.4 Privacy Statement.

2.2 Scope

The CEADPP supports an all-hazards approach to incident response. As described by the Department of Homeland Security (DHS), all-hazards emergency management considers all hazards and incidents that the entity may encounter that can affect disruption of its commodity services (gas or electric) and safety to its workforce or its communities from the utility services:

The Emergency Management department plan must be able to respond to natural and manmade hazards, homeland security-related incidents, and other emergencies that may threaten the safety and well-being of citizens and communities. An all-hazards approach to emergency preparedness encourages effective and consistent response to any condition, emergency, disaster, or catastrophe, regardless of the cause.

Examples of threats or hazards that the CEADPP may apply, include, but are not limited to:

- Wildfires*
- Cybersecurity breach*
- Critical Tech-Apps Failure
- Severe Wind PSPS
- Physical security breach*
- Hazardous spills*
- Grid disruption*
- Extreme weather
- Pandemic
- Gas excavation emergency
- Earthquakes
- Aviation Incident*
- Other hazards that threaten the company's systems, reputation, employees, or contractors

- *Can be human induced not just natural occurrence

The CEADPP, along with related standards and other company-published documentation, governs SDG&E's emergency response efforts. This plan supports and is part of the company's overall emergency response plan framework. However, SDG&E is a public utility company, not a government agency responsible for public safety-threat hazard mitigation. We adopt and follow the all-hazard plans developed through the Joint Powers Act of San Diego County and associated municipalities responsible for public safety and incorporate their risk and hazard threats plans as applicable to the utility operations. SDG&E responsibilities for risk and hazards fall into developing the plans and response capabilities to provide safety to the public from the risks posed by the utility electric / gas commodities, protection of our workforce and to, as efficiently and effectively as possible, maintain or restore services to the community provided by SDG&E. This is further developed in the threat/risk assessment section 2.4.

2.3 Objectives

The objectives of the CEADPP are to:

- Advance SDG&E's response capability as applicable to all hazards regardless of incident type.
- Leverage SDG&E use of the existing company operations structure and resources where applicable to maximize management effectiveness and minimize additional training requirements.
- Base the SDG&E response foundation on the NIMS and SEMS emergency management principles and fundamentals.
- Utilize the EM program and plans throughout SDG&E.
- Train and document all SDG&E response members in their roles, responsibilities, and response processes in the CEADPP.
- Document SDG&E's CEADPP response practices to reflect lessons learned from activations, exercises, and industry leading practices.
- Continuous response training for personnel whenever an approved change is made to the CEADPP.

2.4 SDG&E Threat Situation Overview

SDG&E's service territory is 4,100 square miles with approximately 1.4 million electric metered customers, 905,000 gas metered customers and servicing a population of approximately 3.7 million in San Diego County and Southern Orange County. SDG&E operates in one of the most diverse ecological service territories in the United States with micro-climates including coastal, mountains, and desert, and serves both dense metropolitan customer and remote rural communities. To further complicate providing reliable energy and gas, SDG&E service territory is located at the furthest southwest point of the United States, which limits infrastructure redundancy. As a result, SDG&E has worked to expand its local generation capacity and renewable supply.

Considering all the efforts required to be the most reliable energy company in the United States, SDG&E recognizes it cannot achieve that goal on its own during regional emergencies. SDG&E has developed strong relationships with local public safety partners, telecommunication companies, and other independently owned utilities via mutual assistance agreements. These relationships are in place with the recognition that no single agency or company has the capability and resources to address all disasters or major emergencies. These partnerships extend SDG&E's ability to maintain a safe, secure, and reliable source of energy for the region.

2.4.1 Risk Assessment

All Emergency Operations Plans (EOPs) are required to utilize an all-hazards approach to their response plans as there are several common components, techniques, equipment, and resources that will be deployed, irrespective of the hazard.

Most government EOP plans are centered around natural, technological, and human-caused hazards. These EOP's are designed to mitigate those hazards, limit damage to the community, and enhance public safety for those living in the path of the incident. As defined in the [2022 San Diego County Emergency Operations Plan](#), San Diego County (SDC) is set up as a formal Operational Area (OA) that consists of 19 jurisdictions that range

in population from several thousand to over 1,000,000. In the same territory, there are also 18 different tribal nations. These combined communities create a total estimated population in San Diego County alone of over 3.3 million.

The SDC and the jurisdictional governments within San Diego County, established their legal authorities and all-hazard risks and mitigation plans, which are accounted for in this document. The risk assessment components, which inform the SDC EOP are summarized in their table 1 below from the [MJHMP SD County Base Plan 2023.pdf](#). Southern portions of Orange County falls within SDG&E's utility territory. Orange County (OC), has a current [2021 County of Orange and Orange County Fire Authority Local Hazard Mitigation Plan.pdf](#) with update revision scheduled for 2026.

Orange County's current available plan has a similar list of hazards to SDC. SDG&E accepts the SDC and OC risk plans as accurate and applicable throughout its entire territory and therefore does not attempt to reproduce the same information under a company program. However, we accept only those risk hazards that apply to the damage or interruption of our utility commodity services as listed below.

Every three to five years, the SDC and OC Office of Emergency Services (OES) publishes an update of their hazard mitigation plans, and we monitor for those changes to incorporate any changes to our utility risk assessment. For reference of their hazards, please review the table summary below.

Table 1: Risks Listed in the San Diego HMP and Orange County HMP

Hazards Included in County of San Diego and Orange County Mitigation Planning	
Coastal erosion/Tsunami	Landslide
Dam Failure	Liquefaction
Drought	Nuclear Material
Earthquake	Terrorism
Floods	Wildfire/Structure Fire

2.4.1.1 SDG&E Specific Hazard Considerations

This plan recognizes that during normal operations, service failures will occur. The company's work crews, employees, management staff and leadership routinely respond to make repairs, equipment replacements, new service installations etc., which is the heart of business operations and continuity. A disaster, emergency or public safety event causes more failures over a wider area of company operations and thus causes a re-focusing of company resources or may require resources beyond those normally available. They also require additional collaboration and coordination with regulatory, government agencies, tribal partners, community partners and customer service to reduce or eliminate the issues and restore full company services.

It is not the disaster type that is critical, although there are some disaster specific elements that will need to be addressed for the safety of the public and work crews in the specific hazard annex, but the rapid restoration of the disrupted Gas and Electric services and IT systems are the core of the response.

SDG&E has established a supplemental risk analysis program. This risk analysis document is called the [2023 SDGE Enterprise Risk Registry - FINAL.pdf](#) and is updated yearly and distributed to the VP's and Directors as risk owners and managers of the company. SDG&E's CEADPP accounts for the risks within the registry, which directly affect its operating capabilities. The CEADPP works to mitigate impacts of those risks to the company's service delivery and the responsibility it must provide those commodities to customers, businesses, government services, tribal partners, and health related services.

SDG&E 2023 Enterprise Risk Registry has identified 22 risks to the company and has ranked them from the highest to lowest assessed risk for hazards that will impact SDG&E operations. These are listed in the following table.

Table 2: 2023 SDG&E Risks Listed in Order

Rank	Risk Name	Page	Risk Owner(s)	Hazard Specific Annex
1	Wildfires involving SDG&E Equipment (including 3rd Party Pole Attachments)	3	B D'Agostino	Yes
2	Gas System Excavation Damage1	5	T Taylor	No
3	Employee Safety	7	K Geraghty	No
4	Cybersecurity	9	B Gordon	Yes
5	Capacity Restrictions or Disruptions to the Natural Gas Transmission System	11	T Taylor; P Goldstein	No
6	Electric Infrastructure Integrity	13	W Speer	No
7	Contractor Safety	15	K Geraghty	No
8	Customer & Public Safety –After Meter Gas Incident	17	D Golan	No
9	Incident Related to The Medium-Pressure Gas System (Excluding Dig-in)	19	T Taylor; G Orozco	No
10	Customer & Public Safety –Contact with Electric Equipment	21	W Speer	No
11	Motor Vehicle Incident	23	K Geraghty	No
12	Electric Grid Failure and Restoration (Blackout/Failure to Black Start)	25	J Jenkins	No
13	Insufficient Supply to the Natural Gas Transmission System	27	P Goldstein	No
14	Inability to Recover Critical Technology and Applications	29	B Gordon	No
15	Aviation Incident	31	B D'Agostino	No
16	Workplace Violence	33	K Geraghty	No
17	Incident Related to the High-Pressure Gas System (Excluding Dig-in)	35	P Goldstein; T Taylor; G Orozco	No
18	Lack of IT Resiliency in Foundational Technology Systems	37	B Gordon	No
19	Consumer Privacy	39	D Golan	No
20	Physical Security of Critical Electric Infrastructure	41	W Speer; R Borthwick	No

Rank	Risk Name	Page	Risk Owner(s)	Hazard Specific Annex
21	Environmental Compliance	43	E De Llanos	No
22	Massive Smart Meter Outage	45	D Golan	No

Additional Hazard Specific Annexes *	
1. Earthquake	Yes
2. Pandemic Operations Modifications	Yes
3. Wind / PSPS ConOps	Yes

* A separate hazard specific annex is utilized only if the hazard has special response, compliance, or safety procedural requirements in addition to our normal company response plans. These five plans require an enhanced EM response with an Emergency Operations Center (EOC) activation with extraordinary activities. Others listed would be handled under the responsibilities of their division in the course of their day-to-day operations or can be handled by routine EOC activation. The Wildfire, and Wind / PSPS annex plans have notification / compliance response issues defined by CPUC and CalOES and must be documented procedurally. Earthquake, Pandemic, and Cyber IT annexes cross company authority lines (Semptra Energy, SoCal Gas, and SDG&E management) and require plans that incorporate safety and wide-ranging operational collaboration between the companies involved.

Each risk element in the registry is presented in a format for rapid assessment by managers and directors responsible for the risks in their respective areas. The document for each risk identifies the SDG&E Risk Owner, Risk Manager, Risk Description, Risk Update, Proposed Residual Risk Scores, Risk Bow Tie of Drivers and Triggers and Potential Consequences, and key metrics.

In the registry, the risk is scored in five areas of impact on the company and contain the previous year's score for reference:

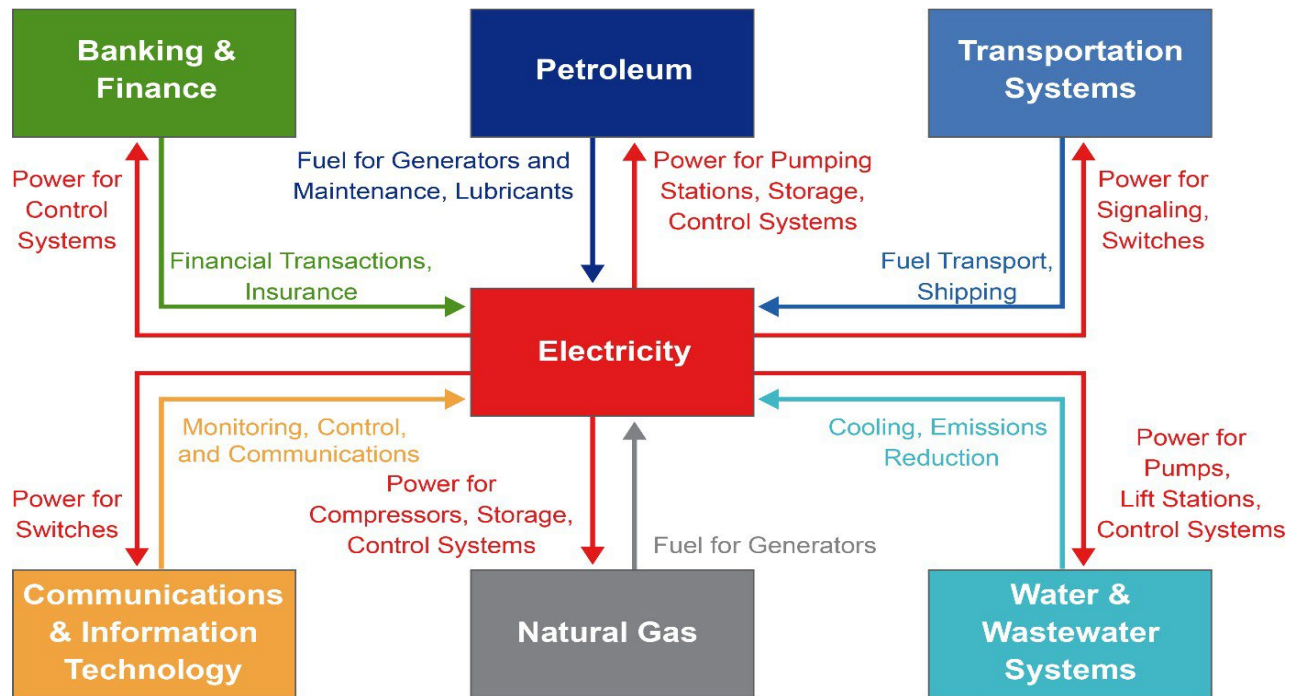
- Health, Safety, and Environmental Impact
- Operational and Reliability Impact
- Regulatory, Legal, and Compliance Impact
- Financial Impact
- Frequency

The Key Metrics component illustrates the SDG&E primary causes for that risk and how it has been managed over the previous three years. This gives the owner or manager of the risk, direction on if mitigation programs formulated for these events are being effective or not.

The Risk Registry is used throughout the company for program or financial developments of company resources and for the development of response plans.

The risk problem is compounded by their interdependencies on electrical disruption. Financial systems, transportation fuel systems, water pump systems, lighting-traffic lights, phones, internet communication systems etc. all depend on electrical power to function. SDG&E systems also have similar interdependencies as illustrated in the following figure.

Figure 1: Interdependencies on Electric Power



- **Source:** 2018: Energy Supply, Delivery, and Demand. In Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II U.S. Global Change Research Program, Washington, DC, USA, <https://nca2018.globalchange.gov/chapter/energy>

2.4.2 Capability Assessment

The EM department has direct oversight over SDG&E's Business Continuity Plans and company-wide emergency response plans. EM responsibilities have a direct impact on risks over which EM does not have direct ownership, but that directly impact SDG&E. These risks include, but are not limited to:

- Wildfires
- Blackouts
- Aviation incident
- Catastrophic damage to gas infrastructure and transmission system
- Pipeline system interruptions
- Unmanned aircraft incident
- Insufficient gas supply
- Workplace violence
- Electric Infrastructure integrity
- IT / Cybersecurity
- Physical security

EM has direct responsibility related not only to mitigation but also, where mitigation is insufficient, towards emergency response coordination where mitigation activities are insufficient from completely removing the risk. The threats and hazards that SDG&E deems most likely to occur and which are applicable to emergency preparedness activities and planning are as follows:

- Earthquake
- Wildfire
- Severe Weather, including hurricane or severe windstorm
- IT / Cyber incident
- Capacity Shortfall
- Hostile Intruder
- Internal Flooding
- Pandemic
- Physical Security Breach such as bomb, terrorist act and airplane crash

The overall purpose of emergency preparedness, including planning, is to safeguard the public, the company's employees, contractors, stakeholders, reputation, and the continuation of essential business functions.

2.4.3 Emergency Plan Implementation

To ensure SDG&E's EM has the resources and logistical support to implement the CEADPP, the EM department has been given the responsibility and authority to maintain SDG&E's EOC and ICS training of all employees designated by their department supervisors to support EOC activations. Currently there are approximately 400 employees, besides the company field responders, who support emergency response within the EOC.

Government Order 166 puts the requirement upon SDG&E to have an emergency response plan and the capability to implement that plan. Therefore, SDG&E leadership has made it a priority for operational and operational support departments provide staff and logistical support to emergency events which require SDG&E CEADPP concept of operations implementation and emergency response.

2.4.4 Mitigation Overview

2.4.5 Hazard Mitigation and Control

The CEADPP supports an all-hazards approach to incident response. As described by the Department of Homeland Security (DHS), all-hazards emergency management considers all hazards and incidents that the entity may encounter:

The integration of plans that address the different types of incidents that may affect SDG&E service capabilities promotes a more consistent and effective response, leading to greater stakeholder satisfaction.

Emergency management must be able to respond to natural and manmade hazards, homeland security-related incidents, and other emergencies that may threaten the safety and well-being of citizens and communities. An all-hazards approach to emergency preparedness encourages effective and consistent response to any disaster or emergency, regardless of the cause.

2.4.5.1 Hazardous Materials

SDG&E's Gas Safety Plan meets the California Public Utilities Code Section 956.6, 961, 963, and CPUC Decision 12-04-010 to meet requirements for safe and reliable operation of its gas pipeline facility. SDG&E's SP.1-SD Gas Safety Plan, and ER-1SD Gas Emergency Response Plan, which outlines all response and reporting requirements and processes followed by SDG&E.

2.5 Emergency Management and Guiding Principles

2.5.1 Vision

SDG&E advances the preparedness of all employees to respond successfully to likely threats and hazards by applying leading emergency management practices, maintaining 24/7 situational awareness through state-of-the art technology,

and strengthening readiness through training and exercising “real life” scenarios. SDG&E will rely on the crisis management principles of ICS-NIMS in emergency responses where the EOC is activated to Level 3 or above.

2.5.2 Guiding Principles

SDG&E will do the following:

- Ensure that safety, public and workforce, is SDG&E's number 1 priority.
- Establish and instill leading emergency management standards and practices (e.g., SEMS, NIMS, ICS).
- Ensure response plans are in place to address the highest risks that the company may face.
- Apply and expand on indices such as Fire Potential Index (FPI), predictive tools, and analytical capabilities to enhance situational awareness before and during an incident.
- Work to ensure that response to and recovery from a crisis or disaster is organized, timely, efficient, cost effective, and decisive.
- Create the foundation for an innovative, connected, and sustainable energy future in collaboration with key stakeholders.
- Treat emergency preparedness as the cornerstone on which the resiliency of the enterprise stands in the face of all hazards.
- Maintain scalable and adaptable capabilities to address simple or complex incidents.
- Actively partner with communities and stakeholders to plan, coordinate, practice, and improve preparedness for and response to incidents.
- Engage in training and exercises to test and ensure that the Company is prepared to respond to incidents.

2.6 Overall Planning Assumptions

The following assumptions apply to this plan:

- SDG&E emergency response responsibilities include the make safe, repair-restoration of electric and gas transmission and distribution services, assets, and resources of the company.
- SDG&E Gas and Electric Service Transmission-Distribution systems disruptions fall into three primary response categories:
 1. **Short-term disruption:** 1-to-7-day duration periods
 2. **Medium disruption:** 7-to-30-day duration periods
 3. **Long-term disruption:** Greater than 30-days duration period.

These categories are addressed in the CEADPP for appropriate level of emergency planning, preparedness, response, and recovery activities required and company management authority responsible to resolve the situations.

- Mitigation activities conducted prior to the occurrence of a disaster result in a potential reduction in loss of life, injuries, and damage.
- SDG&E is not responsible for community first response to normal, natural, or manmade hazardous incidents impacting jurisdictions within our territory. Other governmental emergency organizations are responsible for the safety and elimination of these hazards (i.e., evacuation planning, sheltering, etc.).
- SDG&E may utilize company assets and resources to support other emergency and government agencies upon their request and with executive leadership direct approval. The company Executive Leadership Team may designate pre-approved mission assignments for rapid support as necessary.
- The CEADPP will use existing company organizational components roles and responsibilities in the response structure to involve the existing expertise, processes and assets used daily in the maintenance and repair of company assets. As the event escalates the level of coordination will move up the chain of command. If additional assets are required to support the response, utility command response will be coordinated at the activated Department Operation Centers (DOC) and then at the EOC as needed.

- Beyond weather, with the exceptions noted for PSPS events, the cause of the hazard is relevant only from the compliance notification and communications required to mitigate the hazard.
- Identifying the Essential Elements of Information (EEI's) in the affected area are critical to the crisis management.
- EEI's will be shared through EOC Action Planning and Geographic Information System (GIS) documentation to keep all response personnel cognizant of safety, communications channels, incident objectives, supervisory chain of command and situational awareness.
- The SDG&E EOC will collaborate and coordinate with government EOC's to facilitate incident response and communications coordination with their Public Information Officer (PIO) as the situation requires.
- In weather-related incidents, meteorological analysis will be provided for crisis management decisions emphasizing its potential impact on response and recovery operations safety. It will also define impacts to customers and community's life sustaining issues such as excessive heat, cold, rain, lightening, water, wind, or storms etc.
- Logistical transportation issues such as road closures, damage, fuel availability, and supply chain problems, are tracked, identified, and shared with field responders via the EOC.
- Mutual assistance is requested when additional resources are needed by SDG&E and approved by the designated utility Officer in Charge (OIC). Other Utilities' may request support from SDG&E through the MA agreements signed by both parties and approved by the OIC. They will be provided as available.
- The After-Action Review (AAR) program leads the coordination of mitigation activities. These are addressed in the preparedness emergency planning phase and from After-Action Reports submitted after the incident for approval and incorporation into the appropriate planning documents.
- Supporting continuity plans and operating procedures are updated and maintained by responsible business units and departments on a yearly basis by policy of Sempra. Whenever plans or procedures are modified, applicable training by the unit responsible for carrying out the plans will be conducted focusing on the changes.
- In addition to the hazard specific annexes developed by EM, other applicable business units have developed processes, protocols, and plans to guide their specific activities, which should be aligned with EM.

2.7 Inclusive Vulnerable Community Emergency Management Practices

SDG&E is committed to providing safe and reliable energy to its customers. That promise includes taking actions to prevent wildfires and increasing infrastructure reliability. While working towards these goals, SDG&E recognizes it, and its employees are part of the communities it serves. Therefore SDG&E is proud to partner with community-based organizations to assist in providing quality of life services to "vulnerable" populations during events which may require PSPS.

SDG&E has outreach programs and councils created specifically to engage and receive input from community-based stakeholders and populations who fall under Cal OES's definition of Access and Function Needs (AFN) populations. In 2020 both a Wildfire Safety Council and an AFN Council were designed to engage,

inform, and receive feedback from our territory stakeholders. SDG&E has also developed a wildfire outreach initiative to provide outreach events and fairs to further engage our customers and how they can better prepare for emergencies.

The following are key focus areas for SDG&E Community outreach:

- Accessible transportation
- Assistive equipment and services
- Accessible public messaging
- Restoration of essential services
- Language translation and interpretation services
- Service delivery site American Disabilities Act (ADA) compliance

2.7.1 Community Resource Centers

Community Resource Centers (CRC's) are opened during PSPS events when lines to impacted customers have been shut-off for safety reasons and the impacted customers are without power for an extended period. CPUC currently require the CRC's to be opened from 8AM to 10PM during PSPS events. The number of CRC opened is dependent on

the number of communities impacted by a PSPS event. Resources typically provided at CRC's are charge stations, bottled water, blankets or hand warmers in cold weather, and information on the PSPS event, as well as disaster preparedness, mobile equipment charging stations, and other SDG&E customer programs. SDG&E has agreement for 11 fixed sites in communities and has 3 mobile trailers equipped to support this function at locations not part of the 11 fixed sites.

2.7.2 Donations and Volunteer Management Policy

SDG&E does not accept or utilize donated goods, materials, services, personnel, financial resources, and facilities, whether solicited or unsolicited. While we do use employees who 'volunteer' and train to support our community support services, they retain their payroll status while working in the support category. Volunteering is the equivalent of re-assignment. All external donations and unsolicited volunteers described above are referred to community Non-Government Organizations for utilizations of those services.

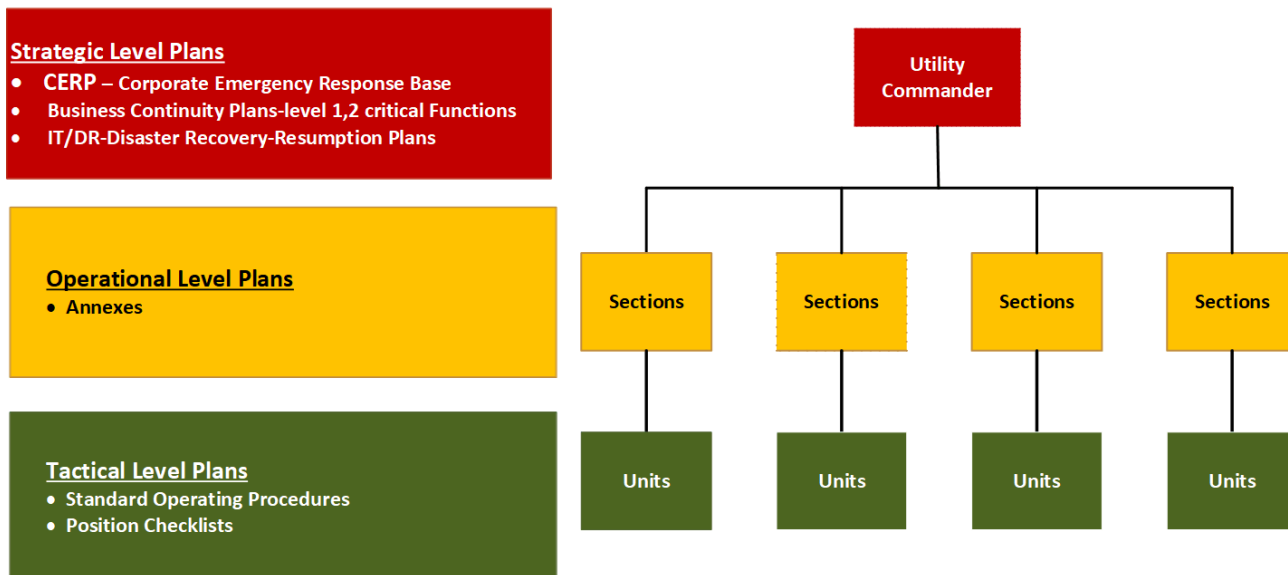
3 Concept of Operations

This section describes SDG&E's approach to incident management or Concept of Operations (ConOps), which applies to any threat or hazard. The objective of this ConOps is to ensure that the company responds in a safe and coordinated manner, while protecting its customer service responsibilities, assets, workforce, and reputation. This approach encompasses the delineation of responsibilities between the company's EOC, DOCs, and the field, and the processes, procedures, and guidelines to support incident monitoring, activation, notification, and demobilization.

There are 3 Levels of planning within SDG&E, as illustrated below, and the CEADPP plan represents the strategic leadership overview of the response. The Operational and Tactical plans are supplemental to this plan.

Figure 2: Document Plan Levels

Plan Levels



The above demonstrates the level of planning as it relates to the level of ICS Org Positions:

- Strategic level Plans are the Utility Executive and Director Management Level
- Operational Level Plans are the Section Chief level (positions in the policy room)
- Tactical Level Plans are the Unit Level (people in the situation room / Department Operations Centers / Field)

Pursuant to this CEADPP, the Officer In Charge (OIC), when activated, is ultimately responsible for incident management and support activities. SDG&E executive leadership will provide for a written Delegation of Authority (DOA) document to provide the designated response leader with the financial and decisional authority powers granted by the company executives on their behalf. While a Utility Field Commander or OIC may also delegate sub-authority and actions, they cannot delegate the responsibilities outlined in this CEADPP or in their DOA. They are ultimately the responsible individual for the response activities. The EM department is responsible for coordinating EOC management activities and activation.

SDG&E's emergency response centers on disruption of customer services and are divided along company commodity lines of services, electric and gas. These commodities and the parent corporation (Semptra) rely on our shared services IT platforms for their support in providing services to customers, affiliate companies (SoCalGas and SDG&E), and Semptra. IT-Cybersecurity is therefore also part of the operational emergency response. Electric and gas services are the main 'product' of the company and have legal and regulatory standards, that have compliance requirements with financial fines that can be applicable. Hence, disruption of these services impacts the company at many levels of public safety, notification requirements, and legal compliance. The magnitude of the service disruption is classified into three emergency response categories:

1. **Short-term disruption:** 1-to-7-day duration period
2. **Medium disruption:** 7-to-30-day duration period
3. **Long-term disruption:** Greater than 30-days duration period

Each of the commodity services have unique response, notification, regulatory, and safety requirements for employee, work crews, contractors, and public at both the state and federal levels. These considerations are incorporated into the CEADPP. There are significant differences in the response between these two commodities and the other operations centers within the company when dealing with the safety and on-scene response.

These are summarized in the bullets listed below.

Summary of commodity and supporting operation centers incident complexity:

3.1 Electric Commodity:

- Central switch control of circuits at Mission Control Center to de-energize electrical circuits affected.
- Grid control stabilization.
- Prioritization and notification of medical baseline customers.
- Electrical Trouble Shooters (ETS) and Restoration crews dispatched to make safe, repair or replace field equipment.
- Line down public and responder safety.
- Line down or equipment failures which could cause fires.

3.2 Gas Commodity:

- Gas lines cannot be turned off remotely. Requires field crews to manually close the pipes and coordinate the response with Gas Emergency Control center.
- Gas is a hazmat, health, fire, explosive issue for public exposure, first responder exposure, and employee exposure.
- Requires Customer Service Field response crews dispatched to every home and business utilizing gas in the affected area to both shut-down meters and after repair to open lines and relight pilot lights.
- Requires on scene coordination with first responders, including fire, law enforcement, and training in ICS-NIMS for proper communications, for safety, perimeter access control both traffic and pedestrian, and potential evacuation of the public in the affected area.
- High field labor involvement.

3.3 Company Security Operations Center (CSOC)-at Sempra HQ for all affiliate companies):

- Facility security and breaches.
- Facility damage and protection.

3.4 Company IT Information Security Operations Center (ISOC):

- Information Breach – Personal Identifiable Information (PII) or company sensitive information.
- Network breach or disruption affecting workflow or control.
- Cyber or malicious software attack.

3.5 Services Repair Restoration Priorities

- Emergencies (life threatening)
- Special cases and critical facilities (as defined by Operations Manager) to include:
 - Critical Customers
 - Customers who self-identify as Access and Functional Needs populations
 - Essential Customers
 - Public Safety Partners
- Primary Electric Outages: Generally, set assessment and restoration priorities to restore service first to critical and essential customers, and so the largest number of customers receive service in the shortest amount of time.
- Non-Primary Electric Outages: Emergency Agencies standing by and equipment damage not related to primary outages;
- Transformer Outages; and
- Single-No-Light outages.

This CEADPP will primarily develop how the two commodities respond to their own unique field requirements, both in regular daily operations and in escalating incident situations. To facilitate emergency response to the incidents, the company emergency response plans will utilize the SEMS and Federal Government mandated and proven ICS-NIMS management response approach, adapted for critical infrastructure Utility specific needs and situation. This approach is used ubiquitously nationwide by first responders. It will also address how and when an incident affects both commodities simultaneously and requires joint field operations. We will use the ICS-NIMS utility compatible crisis management approach to achieve the priorities, policies, guidance, and incident objectives set by SDG&E executive leadership through the designated Officer in Charge. This is compatible with and incorporates the State legally required SEMS principles and approach which includes Operational, Regional, and State Operations centers and the State designated Master Mutual Aid structure for resources.

SDG&E EOC is designed to support, collaborate, and coordinate with all operational groups in an emergency and acts as the focal point for outside agencies, community, governments, and tribal partners involved in the emergency to communicate with company senior executive leadership providing the intent, priorities, strategy, and guidance to our field commands.

SDG&E response plans cover no-notice commodity service disruption incidents from natural disasters, local emergencies, planned preventative mitigation events, and shutdown events resulting from Public Safety Power Shutdowns (PSPS). They are designed to affect rapid return of services irrespective of the source or cause of the disruption. Reference the Risk Assessment section at the top of this document.

The risk hazard may affect the scale, safety risks, or mitigation strategies required to be involved in the response, but the company's main response structure is focused on safely resolving the disruption of services. Specific hazards, threats, or risk considerations, in addition to the response concepts in this concept of operations document, are detailed in the annex section to allow leadership to incorporate the appropriate response at the time of the incident. In all emergency response situations, the following five standing primary directives are used to guide the development of the senior leaderships policies, strategies and priorities which are passed to the EOC and distributed to the UFC's, DOC-

E/DOC-G, Area Commands (ACs) and for their use in developing the tactical incident objectives, strategies, and tactics to effectively resolve the emergency.

1. Lifesaving and safety of personnel and public.
2. Life sustaining response considerations for customers and external stakeholders.
3. Property protection including SDG&E facilities, assets and to the public.
4. Environmental protection including hazmat and contamination issues.
5. Reputation and financial stability of the company.

3.6 Incident Management Structure

This concept of operations is structured into 5 response levels, each incident is characterized by a description of the severity or complexity of its impact to the operating capability and disruptions to the commodity customer services function of the company. Categorizing a threat or hazard, using a pre-defined set of criteria, provides a more accurate assessment of the effects of an incident, and the resultant size and scale of the company response and restoration requirements.

The activation level of the EOC is determined by the authority, skill level and company resources required to effectively manage the incidents or events impacting the company. This includes internal coordination within SDG&E and by the external collaboration, notification reporting requirements with community and regulatory agencies based on that incidents' impact.

- The Government EOC is formed to coordinate, collaborate, and support community life sustaining issues, mass care and resource requirements of the first responders tactical field commands. The government EOC's are formed by the Authority Having Jurisdiction (AHJ) and the elected official or his designated, delegated authority to set the guidance, priorities, and oversight strategies for the tactical commands to follow.
- SDG&E EOC is formed under the company senior leadership authority, who also set the guidance, priorities, and oversight strategies for the tactical operations centers to follow in resolving the incident issues. A major difference is that the incident leadership is responsible to the Executive Management Team (EMT) of the company, the first AHJ that delegates the authority to an SDG&E executive to act as the utility Officer in Charge (OIC)). The OIC is sub-tiered to the Sempra Headquarters Incident Center authority (HQIC), a higher-level AHJ that coordinates with SDG&E EMT when impact exceeds local capabilities.

SDG&E therefore follows two levels of response authority, the first is when the impact is within the capability and capacity of SDG&E to resolve locally (OIC-EMT) and the second is when the impact is beyond SDG&E capabilities and Sempra parent corporation will become involved in the authority and decision process (SDG&E OIC EMT- Sempra HQIC). Note Sempra involvement is financial-reputation-legal driven, not commodity operations level.

3.6.1 Incident Notification and Response Leadership Functions

Notification to Emergency Management of an emergency could come from an Operational Department Director or their designee, District Manager, Media Communications, the Customer Care Center, or First Responder Agencies.

The 24/7 Emergency On-Duty (EOD) employee is responsible for obtaining accurate incident information and contacting Emergency Management leadership. The designated EOD has an Emergency Management on-duty phone number, text capability, and email that provides the mechanisms for receiving and alerting SDG&E Emergency Management of an incident. The EOD will contact the notifying party within 30 minutes, obtain relevant information, follow incident action requirements in the EOD Binder, and contact the Emergency Operations Services Manager, who will instruct the EOD of any additional notifications and/or actions to take.

If the EOC is activated, then each of the emergency contacts on the agency listing below will be notified of the activation and will be provided follow up information at a reasonable frequency throughout the event. The EOD will develop and maintain records of initial contact and each subsequent contact as necessary.

The exception is the CPUC, who is contacted by SDG&E's Regulatory compliance/claims departments when reporting criteria are met.

Agency Listing

- California Energy Commission (CEC) 916-654-4287
- California Public Utilities Commission (CPUC) 800-235-1076 (reporting hotline, leave message)
- CalOES California State Warning Center (CSWC) 916-845-8911
- California Utilities Emergency Association (CUEA) Executive Director 916-845-8518
- County of San Diego Office of Emergency Services 858-565-3490
- County of Orange Office of Emergency Services 714-628-7050

The incident management structure is designed to expand or contract to any given level as the emergency response and recovery requires.

Regular daily operations do not require activation of the EOC and is managed by the Electric, Gas commodities and the appropriate company operations centers or districts following company developed processes and protocols.

The activation of company EM personnel and resources becomes involved, and the ICS-NIMS-SEMS crisis management structure of this plan is implemented when the event or emergency expands to require company executive leadership (OIC) involvement, or as the incident goes beyond the normal impacts to:

- Company resources
- Public safety
- Regulatory requirements or government agencies
- Community or business partners
- Internal and external support for the incident and its responders

There are three primary pathways to an expanding or escalating incident, Electric, Gas, and IT-Cyber. EOC activation, response, and the scaling up of company response can be triggered by either one individually, both together or due to other risks, including IT-cyber-attack, IT systems failures, facility intentional damage, or other risks that can cause significant impact to the company operational capability or health and safety of company or public individuals. Reference the SDG&E Threat Situation Overview section 2.4.

The activation of the EOC and CEADPP will always be dependent on the scale, velocity, and potential impact of an incident or event on SDG&E and the authority and resources required to manage the situation.

In any situation where the health, safety, or property damage to the public may occur because of SDG&E assets, SDG&E has developed and will utilize its special support teams, including Air Operations support units, Fire Coordination units, Community Resource Centers, Customer Service Field units, Medical Baseline notification units etc., who are activated through the emergency plans to support the situation. SDG&E Notification Process Team rapidly and consistently provides the situation awareness to our government agencies, tribal partners, community partners, and customers.

Finally, there are defined roles and responsibility between an EOC and tactical field commands that must be maintained to be compliant with NIMS-SEMS and prevent impeding effective response, confusion in response staff or put response workforce at risk through competing directives:

- The EOC OIC, senior company leadership and executives identified in the operations policy group have sole authority to determine on behalf of the company, the operational policies, priorities, strategies, company media messaging and guidance the field commands must follow.
- Once the guidance is approved, it is the responsibility of the OIC (through the EOC) to notify and transmit that guidance to the field operational commands, District UFC's, DOC-E AC's and DOC-G AC's or appropriate affected company departments, to use in developing their tactical operational plans.
- The Tactical Field Operations under both Electric and Gas Districts and their corresponding DOC-E and DOC-G, will utilize the company guidance. They are responsible to develop the utility field command objectives, operational period, and battle rhythm, utilized in the ICS-NIMS incident management planning 'P' process to effectively manage the incident and develop the operational period Incident Action Plan (IAP) for their incidents.

- The EOC is responsible for collaboration, coordination, messaging, and approved information for release to media, government agencies and the public. While local field commands may discuss their local on-scene actions, they are not authorized to represent company policy, incident assessments or incident causes and liabilities. Such information should be referred to the EOC PIO Management staff who is responsible for development of all talking points, to include field personnel.
- The Emergency Management Department coordinates and ensures ICS centralization throughout the company to improve consistency, continuity, and coordination of these functions.
- All personnel active in the incident must follow the NIMS-SEMS principles of Chain of Command, Unity of Effort, and Span of Control to maintain an efficient response and resolution of the incidents.

3.6.2 EOC Area of Responsibilities:

- | | | |
|--|---|---|
| • Policy, priorities, and strategic incident or event guidance development | • Information collection and analysis for situational awareness (EEI's) | • Internal and external notifications and activations |
| • Support to field operations | • Customer and partner liaison | • Customer support |
| • PIO and media support | • Regulatory notifications and compliance | • Logistical support |
| • Plans and documentation support | • Financial documentation support | • Regional Coordination |
| • Mutual Assistance requests, verifications | • Cal OES / CPUC briefings | • Cal SOC, UOC Information coordination |

4 Department Operations Centers (DOC) and District C&O Mgrs.:

Responsible for the safety, resource allocation, tactical assignments, damage assessment, control-repair- restorations of commodity incidents, de-energization, and re-energization processes of company assets in normal daily workforce operations and in the management of field operations in emergency events following the guidance from OIC and support from the EOC, when applicable.

4.1 Regular Day-to-Day Operations

SDG&E is well versed in the daily operations of service, facility security, internet-cybersecurity, local maintenance, repair, and installation of equipment. If the event does not impact the safety of the public at large, impact company service capabilities or assets, the event is considered within the normal routine response capabilities of the operating districts and workforce. The on-scene commodity supervisor or the district will become the Utility Field Commander (UFC) for that incident depending on its complexity. No activation of the EOC response structure is warranted. There is always an EM on-call duty (24/7) and monitoring set of personnel to provide support, notification and evaluate the events in case the situation escalates and requires further activation or involvement of response functions. The simplified ICS-NIMS gas and electric response structure are illustrated below and will scale-up with resource units as required to manage the incident.

- Figure 3: Typical Gas District-Local Field Response, illustrates the general basic small incident for Natural Gas (NG) field configuration.
- Figure 4: Expanding Incident Gas Field Organization, demonstrates a larger incident involving community first responders at the scene. Coordination between SDG&E response teams and the first responders is necessary utilizing an Incident Support Team with qualified ICS trained personnel to act as advisors, liaisons to support the UFC in the field.

Figure 3: Typical Gas District-Local Field Response

Department Operations Center-Gas Level 5 (District)

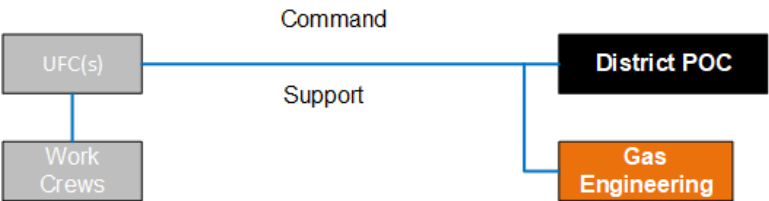
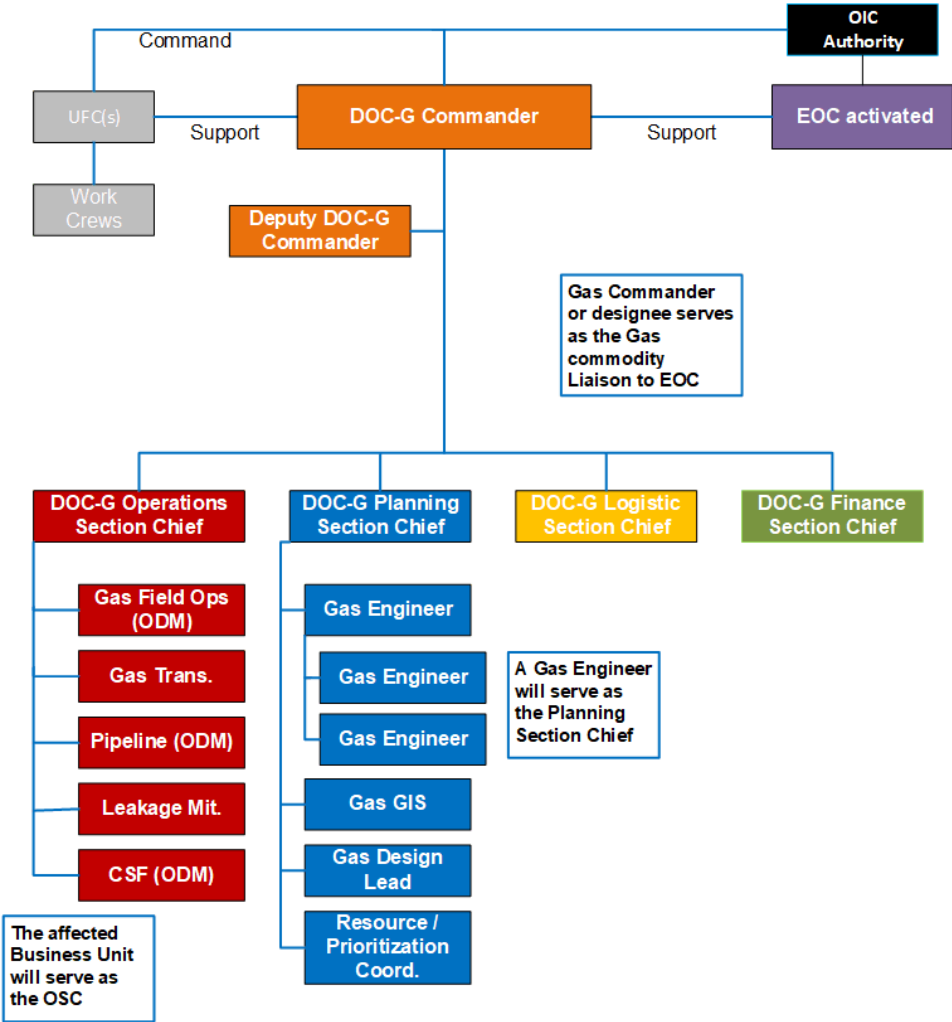


Figure 4: Expanding Incident Gas Field Organization DOC-G involvement.

Department Operations Center-Gas Level 2 (Activated)

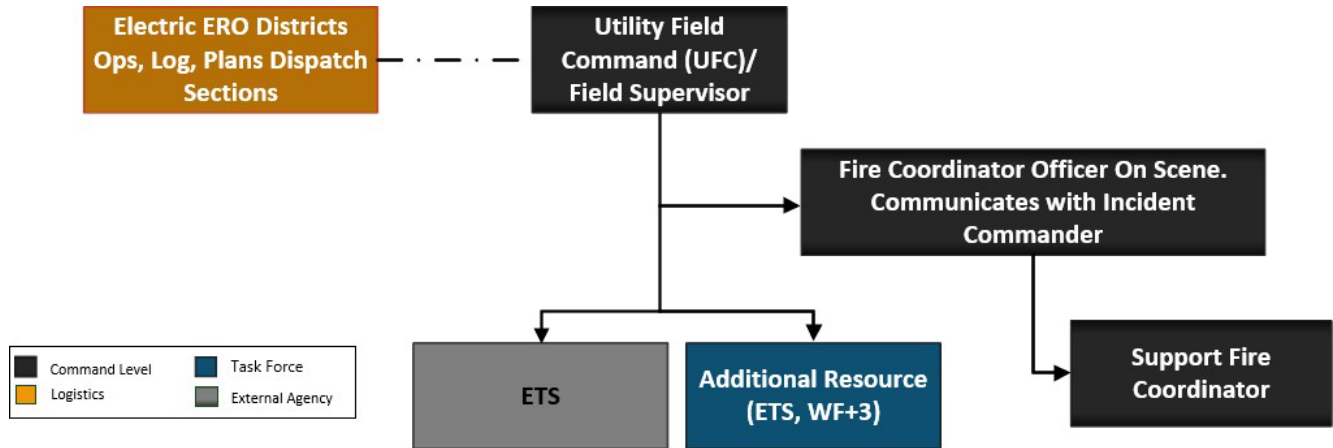


Field responses to localized electric incidents are slightly different from gas due to the different functions and hazards being mitigated. For example, electric response relies on the SDG&E Fire Coordinator function to provide the local onsite assistance like the Incident Support Team for gas events.

Figure 5 Typical Electric District-Local Field Response, shows the organizational structure for a localized field incident.

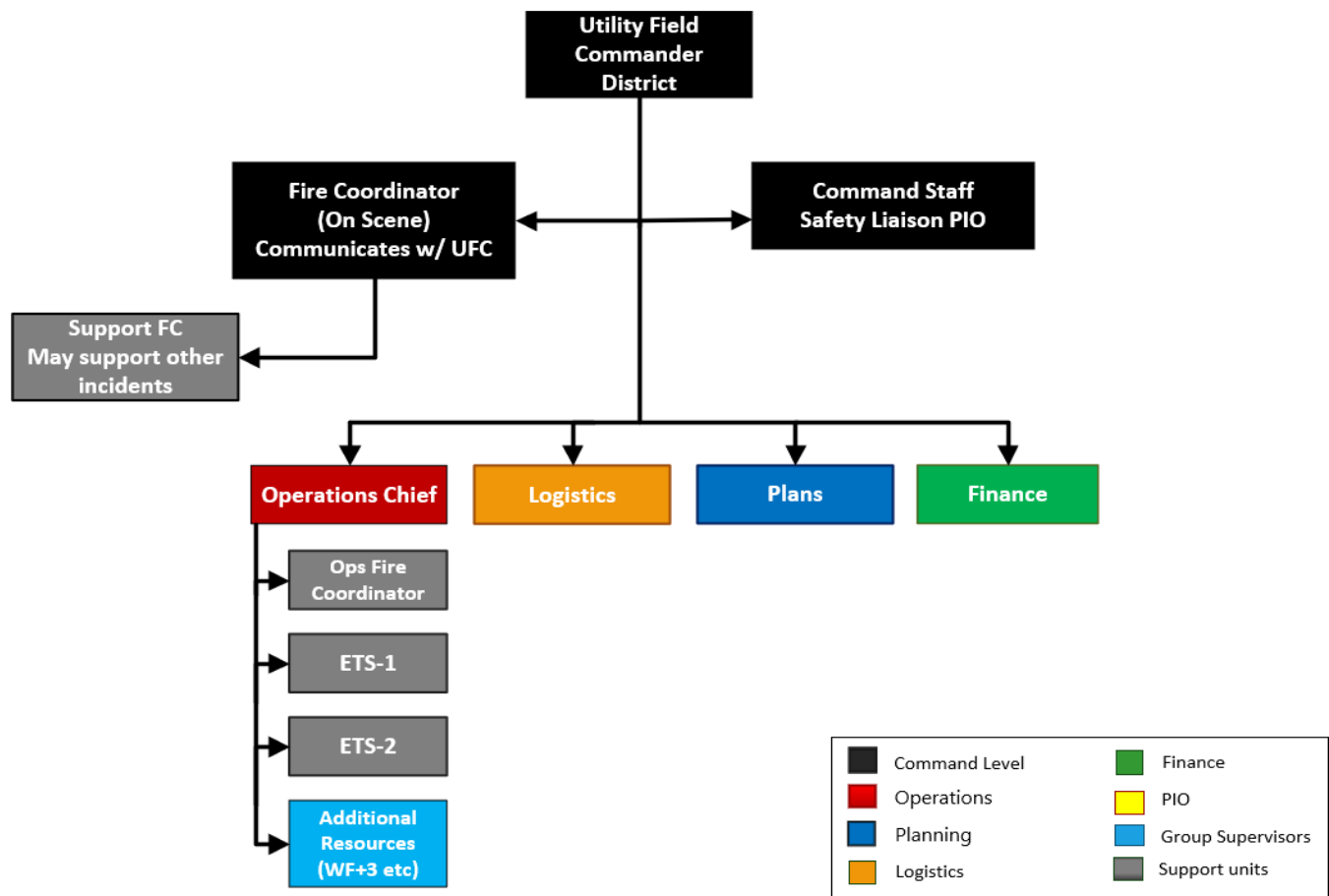
Figure 6 Expanding Incident Electric Field Command Organization, comparison demonstrates a larger incident which also requires support and coordination with first responders.

Figure 5: Typical Electric District-Local Field Response



- ETS is the Electrical Trouble Shooter resource.
- WF is the workforce and number of personnel assigned.

Figure 6: Expanding Incident Electric Field Command Organization



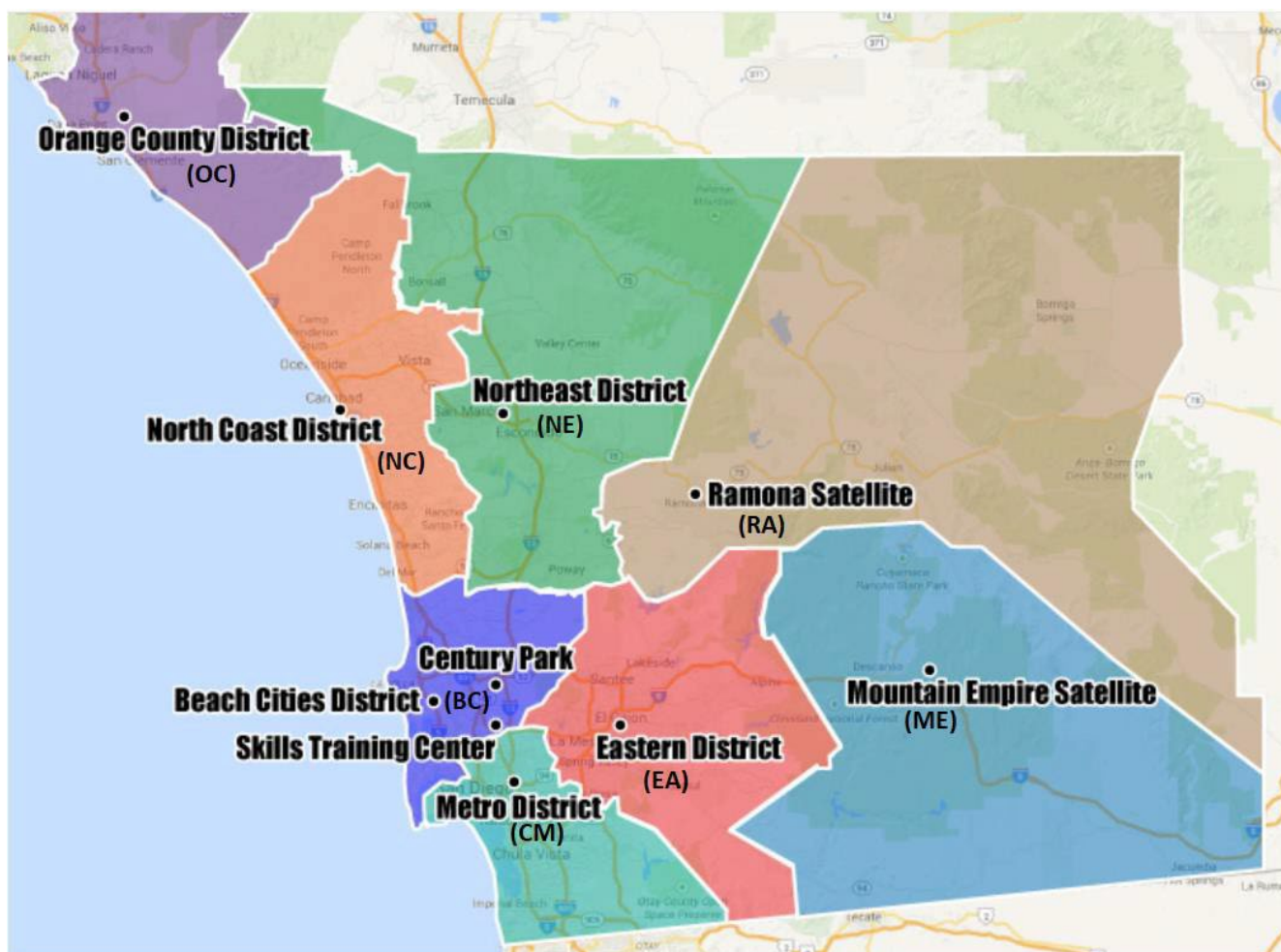
4.2 Company Commodity Services Areas of Responsibilities, Gas, Electric, IT, Security

The company commodities are divided into service districts for resources and operational control. These are illustrated below for easy reference.

Note: The Gas districts do not service the Mountain Empire, Ramona, or Orange County areas as they are on either propane services or on other service providers.

IT and Cyber Security services are not divided by districts either. The IT departments support SDG&E, SoCalGas and Sempra Corporate in a shared services mode.

Figure 7: SDG&E District Region Map with abbreviation labels



4.3 Incident and EOC Activation Levels

The criteria used to define the severity of an incident for SDG&E include hazard-specific conditions and impact conditions such as:

- Number of customers affected
- Resources deployed to address the incident
- Estimated time of restoration (ETR)
- Facilities or systems impact
- Workforce impact
- Financial impact
- The extent of media and political external interest
- Company reputational issues

The incident types and the descriptors for each are intended to be used as guidelines for preparedness and response planning. There is a difference in how we classify an incident or event type based on its impact to the company and the EOC activation, staffing, and subject matter experts in work areas required to resolve the situation.

The incident or event is evaluated to define how significant of a disruptive impact to the company's capability to safely provide its commodity services to our customers, proper workforce environment, company infrastructure, facilities, resources, and meet our regulatory obligations. The larger the negative impact to these functions or disruption of services, the greater the resources required to repair or restore those services. The company response may range from a simple executive notification about the incident, which usually can be accommodated within a couple of days by field crews, to an EOC activation Level 1 which is catastrophic and may need external mutual assistance and months to restore.

In other words, a Level 1 incident classification has the potential to exceed SDG&E's authority and/or financial capability to resolve. As the severity of an incident increases, the financial impact to the company expands accordingly and can extend to the Semptra stakeholders where we would coordinate with the Semptra Headquarters Incident Center (HQIC) through the SDG&E Executive Management Team (EMT) leadership decision process.

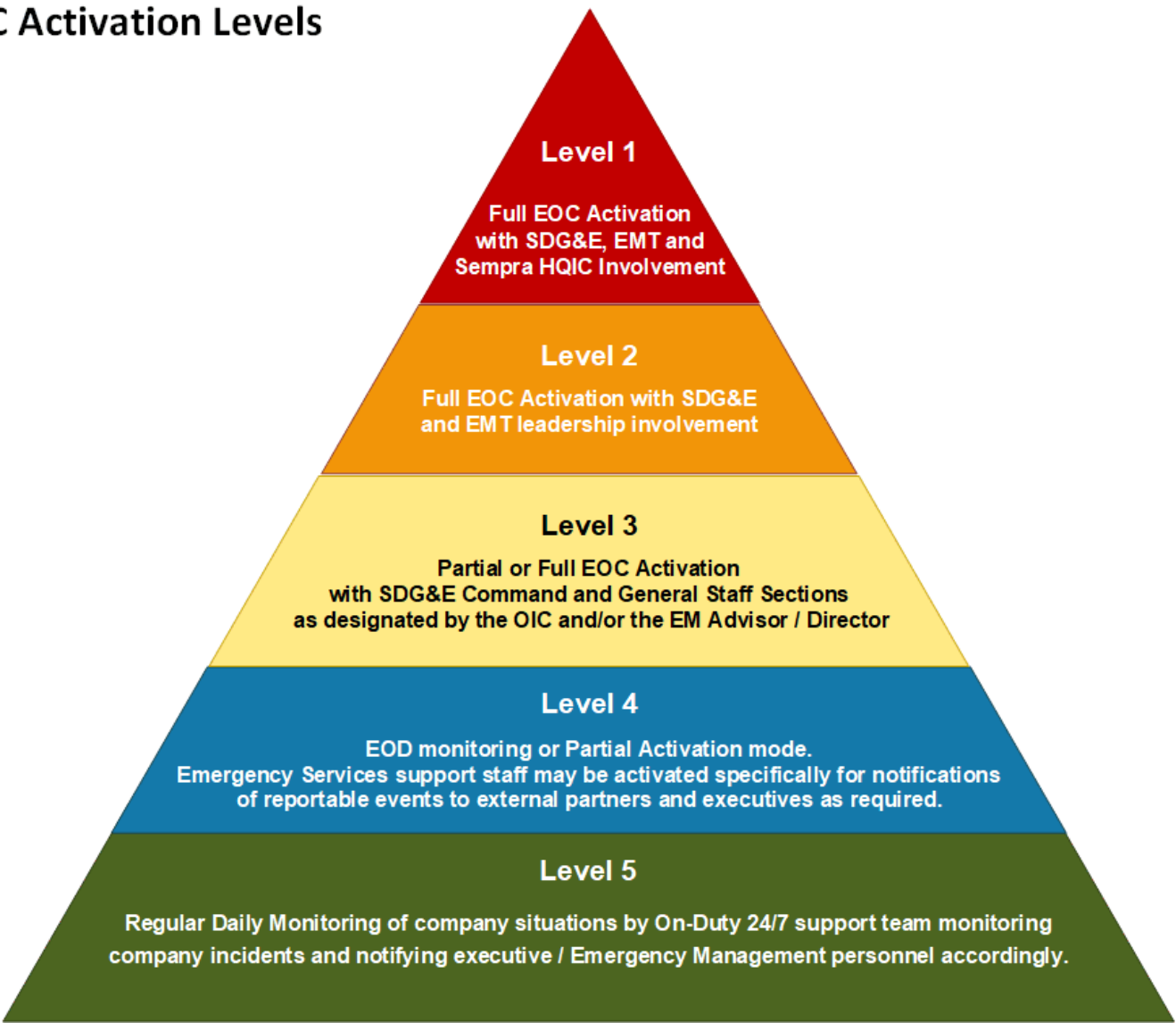
The EOC activation levels determined the authority, skill level, and company resources required to effectively manage the incidents or events impacting the company. It is how the Emergency Management leadership group (EM Advisor, EM Director, and Officer in Charge), and its staff, will expand to meet the response situation as follows:

- **Level 5: Green, EOC Not Activated** – Regular Daily Monitoring of company situations by the Emergency On-Duty (24/7) support team monitoring company incidents and notifying executive/ Emergency Management personnel accordingly. Does not require activation of the EOC. There is no expectation of reputational or financial exposure from this incident.
- **Level 4: Active Monitoring, Blue, EOD Monitoring or Partial Activation mode.** – An incident or operating condition, active or transpired, that has the potential to limit the ability to meet customer demand, to cause damage to company assets, or to disrupt business processes. The number of customers affected, or systems issues to be addressed can be addressed within company resources. Emergency Service support staff may be activated specifically for notification of reportable events to external partners and executives as required.
- **Level 3: Serious, Yellow, Partial or Full EOC Activation with SDGE Command and General Staff Sections as Designated by the OIC and/or EM Advisor.** – An incident that decreases the ability to meet customer demand or carry-out critical business processes. An area-wide or higher profile incident involving a significant number of customers, affecting multiple company businesses, and/or resolution may require more resources than available within the company. The incident may draw media, regulatory and governmental interest, and questions. Reputational damage could occur if the response is not addressed effectively and timely. Financial exposure will be limited. SDG&E Command and General Staff sections as designated by the Utility Executive and/or the EM Advisor. EOC positions can be partially or fully staffed, (virtually or physically) as necessary to support the incident.
- **Level 2: Severe, Orange, Full SDG&E EOC Activation Including the Executive Management Team- EMT** – Incident that creates such a severe impact that resources from across the company will be required to restore services, maintain operations, and/or additional non-company resources may be required to support the recovery effort. It may involve large numbers of customers and may result in significant customer inquiry volume. Employees' families may be affected. Facilities may be evacuated. There will be increased and on-going media attention. Government entities and regulators will want on-going reports regarding the status of company preparedness, response, and recovery conditions. There may be reputational and financial exposure. The EOC response positions are fully staffed (in person or virtual) appropriate DOCs are activated, and EMT involvement could be required. Usually necessary when multiple companywide departments are or could be affected or commodity service disruptions are involved but does not meet catastrophic loss or damage to company assets criteria. The EOC staff is fully engaged with its senior leadership and the severity of the events are within the SDG&E company area of responsibility and resources to resolve.
- **Level 1: Catastrophic, Red, Full SDG&E EOC Activation and Semptra Headquarters Incident Center (HQIC) Coordination** – An incident that is significantly disruptive to a wide range of operational and business processes both within the company and the communities it serves. Resources may be drawn from outside the region which could include resources from outside the state. It may require coordination of the company's response across the service territory. There will be significant financial exposure and significant potential for reputational damage. The incident will draw national media attention and likely will involve or draw scrutiny from State and Federal agencies, regulators, and political leaders. Fully staffed EOC, appropriate DOCs are activated, EMT and potential or real involvement coordinating with Semptra HQIC will be required.

The following EOC activation level diagram in this section illustrates the criteria that SDG&E will use to characterize the response management requirements.

Figure 8: EOC Activation Levels

EOC Activation Levels



Important: The staffing qualifications and filled EOC positions are dependent on the severity of the incident or event on company assets and capabilities. Even a Type 3 incident or event classification can create the need for a fully staffed EOC level 2 to coordinate the event. The EOC is configured when more senior leadership authority is necessary to approve appropriate company financial, resource, priority, or strategic guidance level commitments.

4.4 Disruptions of Service

The emergency response is related to the severity and magnitude of the manmade or natural disaster affecting company operations. From the company perspective, the level of response, EOC activation levels and authority to respond, is founded on the potential disruption of its commodity customer services, business functions or network communications capability or public safety mitigation, not the incident or event causing the disruption. The threat or hazard type influences the safety and velocity of the response, but it is the effect on company operations that determines the company's focus in the emergency response. There are 3 Levels of disruption identified for the CEADPP operational requirements. The disruption time does not mean EOC activation levels, it means the company has the capacity to resolve the issue within that time frame and may still require full authority and Level 1 response activation authority to resolve the situation within that time frame.

Note: Normal work repair and restoration services that occur daily are not considered part of the company emergency response plan or activation criteria. These are handled by company departments and procedures on a regular basis as noted in section 3.1.2 Regular Day-to-Day Operations on page 19.

The disruptions in customer services are identified as:

4.4.1 Short term disruption:

- 1-to-7-day duration periods. (Plan Section 3.2.1.1)
- Capacity and resources usually within company and district response capability.

4.4.2 Medium disruption:

- Seven to 30-day duration periods. (Plan Section 3.2.1.3)
- Major drain on company capacity and resources, usually involving multiple district offices.

4.4.3 Long-term disruption:

- Greater than 30 days duration period. (Plan Section 3.2.1.4)
- Major financial and resource issues that may be beyond initial company response capability requiring mutual aid, California Utility Emergency Association (CUEA) program and Sempra executive involvement.

These are detailed in this CEADPP in the appropriate plan sections reference links above.

4.4.4 Short-Term Disruption Incidents - DOC, Level 3 or 2 EOC Activation of 1 to 7 Days

If, on a field emergency site where first responders are present or an advisory support function is requested, a supplemental Electrical or Gas Support team may be dispatched to the site to implement ICS support coordination between the SDG&E work crews and the responders. This team is designated as an Incident Support Team (IST, Gas) or Fire Coordinators (FC, Electric) and supports the field supervisor designated as the site 'Utility Field Commander' (UFC) or the District UFC in complex events. These support teams act as advisors, liaisons, media support, command staff ICS qualified component for the field and coordinates with the first responders, so they understand the hazards the SDG&E team are repairing and when it is safely resolved. The response workforce team composition is determined by the resources necessary for the local incident requirements but will always have a leader, Utility Field Commander, appropriate liaisons and will also coordinate with the Department Operations Centers and Districts as the situation unfolds. These concepts are illustrated in a singular response Figure 3 through Figure 6 above. An expanding field operations structure and EOC, DOC, Area command are detailed in figures 9 and 10 below. EOC Level 3 operations structure is illustrated in Figure 15 in Appendix A.

When an incident is of sufficient scope and magnitude to affect a 1-to-7-day disruption in customer services which may require government and regulatory agency notifications and involvement, then the incident would be considered a serious impact to the company. This would either warrant the stand-up of district level authority to oversee the operation with OIC involvement, figure 9. If the incident crosses district boundaries with multiple incident sites / UFCs involved, it would become an executive authority level operation as depicted in figure 10. The respective Department Operation Centers (DOC) for Gas and or Electric and may require an Area Command protocol to maintain span of control for the OIC overseeing the incident. This is also illustrated in Figure 10. A commodity's DOC is activated when the need for coordination of a commodities multiple operating divisions or departments are necessary to resolve the incident issues. When activated, the DOC represents the operations section of their commodity ICS response mode and is directed by the commodity's commander.

Area Command is instituted only in large multi-district / multi-incident events. This ICS management element is designed to de-conflict authority overlaps over resources and ensure the strategic company priorities and intent set by the SDG&E Officer in Charge (OIC) are met. The Area Commander (AC) is designated to be the tactical decisional authority to implement and ensure the OIC strategic company directions and priorities are being allocated between field authorities (SDGE UFCs and Districts). Especially in incidents where resources must be prioritized to maximize company, customer (AFN, Medical Baseline, critical facilities etc.), Government or first responder considerations. The OIC makes the strategic considerations (strategies and priorities) on behalf of the company. The designated Area Commander (AC) then implements those directions utilizing the commodity resource allocations and providing direction to the responding districts field resources through communication with Utility Field Commanders (UFCs). The AC is normally located at the Department Operations Center but may also be activated remotely in a Hybrid or remote activation posture.

Note: The DOC and AC structures are available in all three response situations (Short-, Medium-, or Long-Term disruptions as applicable and requested by OIC / EM Advisor).

If the incident is significant enough where the EOC needs to be also activated to support the DOCs for the short duration, then SDG&E's EOC may be activated to a limited Level 3 or Level 2 to coordinate with the appropriate government agencies, community emergency partners and public. An EOC activation includes the involvement of senior company leadership authority. The EOC activation levels are described above in section 3.1.1. in greater detail.

Prior to EOC activation, the utility OIC along with the advice from the EM Advisor would determine whether an EOC Level 3 or Level 2 activation is required. The responsibilities of the EOC team are to provide the crisis management support to the OIC for internal or external coordination-collaboration, and resource support. The field commands implement the guidance into tactical response assignments to safely resolve the situation. The connections between the field, DOC's, EOC and executive leadership is illustrated in Figure 10: Executive Leadership-Area Command-Utility Field Command Model. The EOC organizational structures for SDG&E's Level 3 to Level 1 is in Appendix A in figures 15, 16, 17.

Figure 9: District Utility Field Command Model

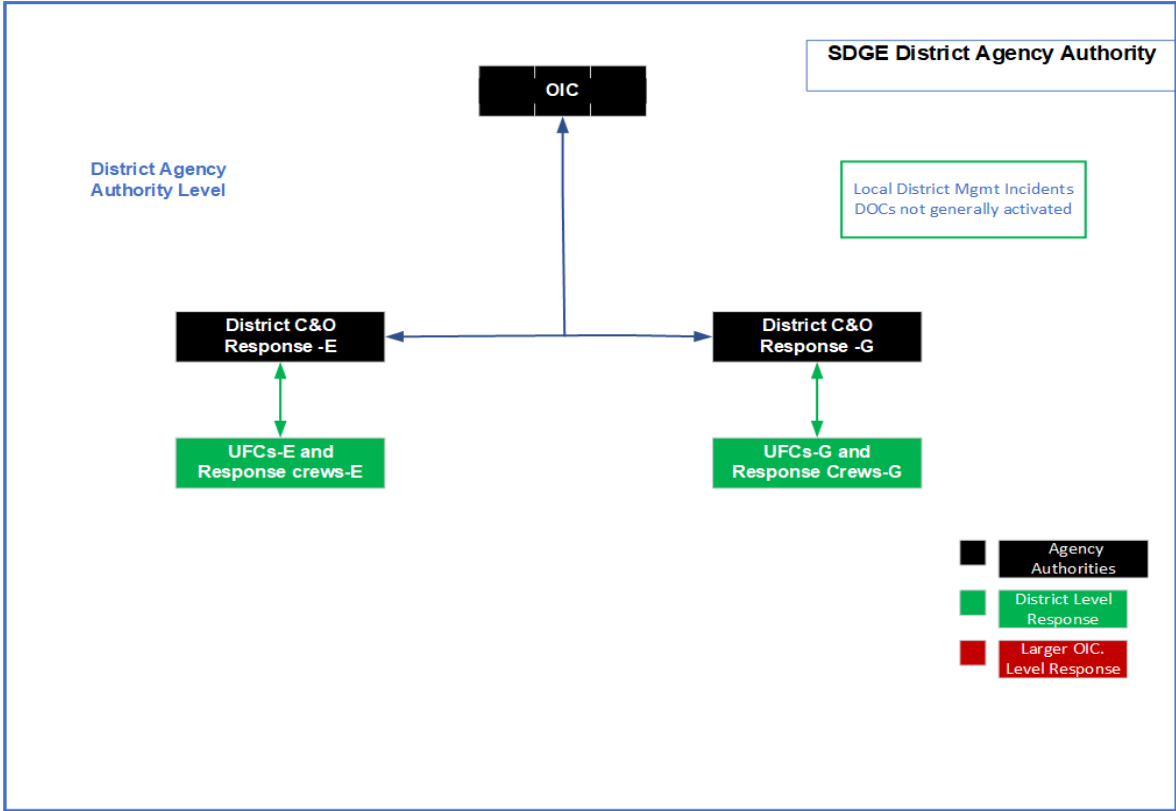
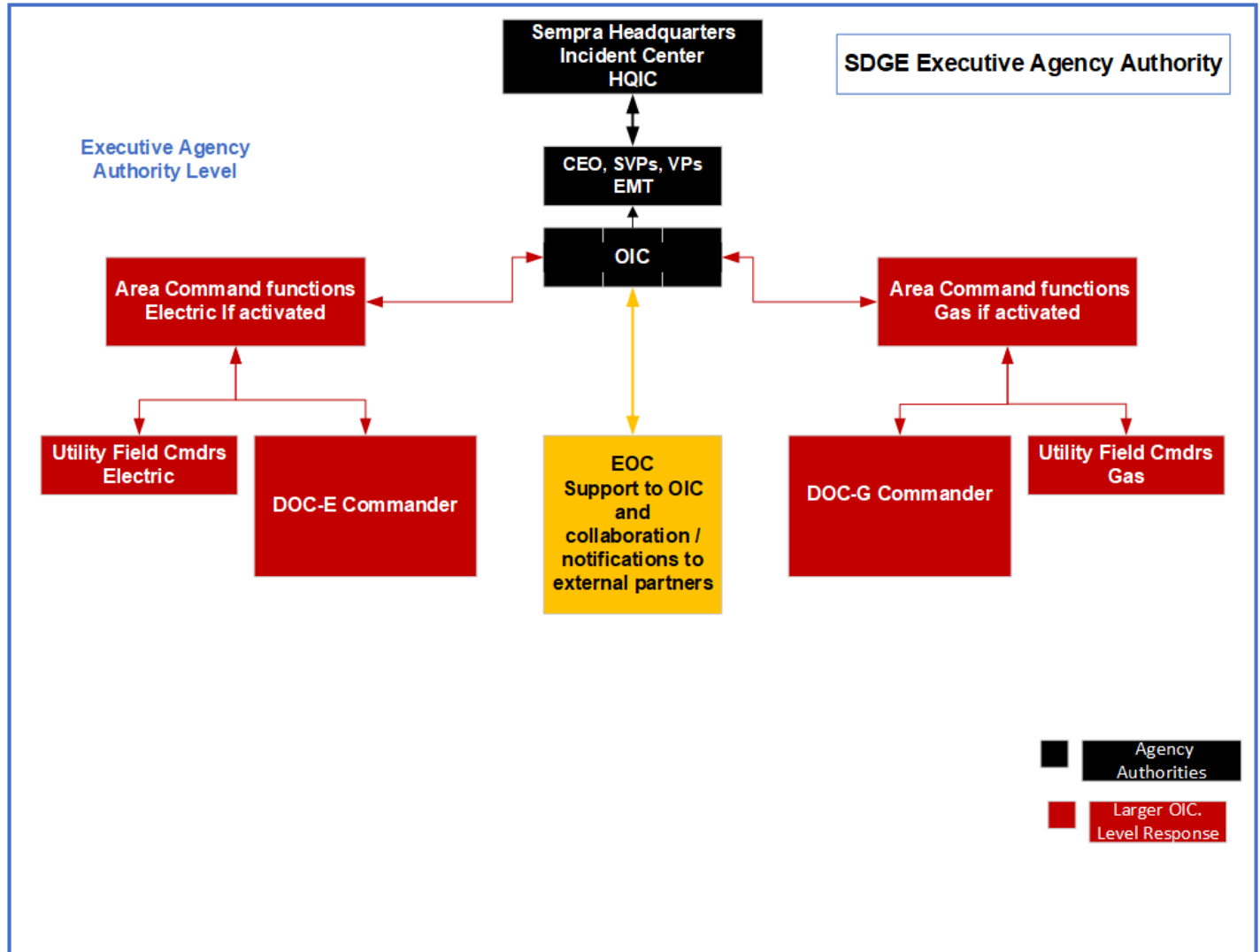


Figure 10: Executive Leadership-Area Command-Utility Field Command Model



Note: The supplemental field teams are for coordination with the first responders and advisors to the UFC's, not to direct SDG&E field work crews.

4.4.4.1 Special Case Public Safety Power Shutoff Events

A Public Safety Power Shutdown is a planned event which may occur when factors such as a Red Flag Warning, extreme FPI ratings of 14 or above, combined with high wind speeds are expected. In these cases, circuit de-energization for the safety of the affected area is activated to avoid a catastrophic fire risk from line failures. There is no actual damage yet but the potential for line failure and catastrophic fire risk is sufficient to require power mitigation preventative measures. There are major notifications and regulatory requirements around such an event, and it requires the designated executive authority (OIC) to authorize all actions since it will directly affect customers and medical support equipment in that area. This is the one situation where tactical control is shifted from the field to the executive, UFC-OIC and the executive team becomes the lead in the EOC activation level moving to 2 and DOC's reporting directly to them for assigned action. Refer to the Wind Event/ Public Safety Power Shutoff Concept of Operations in Annex F, for details.

4.4.4.2 EOC Level 2 Activation Involvement Option

When an incident is of sufficient scope and magnitude to affect significant customer services that would require government and regulatory agency notifications, involvement, and the utility OIC, EM Advisor determine it is appropriate to activate the full EOC team for support, a Level 2 EOC activation would be required. An example of this type of operation would be:

- Damage or the threat of significant loss of services, short-term or medium-term that would affect public safety.
- Loss to community critical infrastructure.
- The utility OIC wants all section leads available for complexity of the incident, such as the PSPS event.

This would warrant the stand up of a Level 2 EOC activation to coordinate the appropriate government agencies, community emergency partners and public and includes the involvement of SDG&E senior executive leadership (EMT) authority to provide appropriate guidance and priorities as necessary. The activation levels are described in CEADPP section 3.1.1. in greater detail. The responsibilities of the EOC team are to provide the crisis management to the utility OIC for internal and external coordination-collaboration, resource authorization, guidance and priorities for restoration or resolution of the crisis. The field DOC's implement the guidance into tactical response assignments to safely resolve the situation. The following figures illustrate how SDG&E ICS- NIMS response structure scales up to full DOC Area Commands, District Utility Field Commands and the EOC full activation sections to support the incident response. An example of a Level 2 activation with a multiple gas district complex incident and implementation of a general Area Command-District Field Command structures for both commodities is represented Figure 9. The overall leadership-Area Command-District Command coordination / authority function is represented in Figure 10. The corresponding EOC Level 3 and 2 organization structure, depending on operational complexity, is illustrated in Figures 13 and 14 in Appendix A.

4.4.5 Medium Term–Expanding Serious-to-Severe Level 2 Incident Classification Causing Service Disruptions of 7-to-30-Days.

Incidents with severe impact to company service capabilities, public or company personnel safety, company financial and reputational impacts that are projected to last from seven to thirty days and events where mutual aid assistance compacts may be instituted as determined by SDG&E senior executive leadership, the EOC will be activated to a Level 2 or 1 response operations. This level is of sufficient magnitude that it involves operating in full ICS-NIMS organizational capability. The management principles of NIMS are used to expand and develop organizational structure to meet the emergency response, unity of effort, chain of command and span of control NIMS requirements. The primary change from the Level 3 EOC activation is the level of authority involved in SDG&E executive leadership, EMT involvement, the EOC positions active, and the number of emergency response personnel required in the crisis organizational structure. Level 2 requires senior experienced leadership throughout the organizational leadership team, utility OIC with sufficient delegation of authority level to approve the financial and resource prioritizations required and will coordinate with the SDG&E EMT executive leadership on the operational guidance, priorities, strategic involvement, resource commitments, Figure 14 in Appendix A.

The responsibilities of the EOC team are to provide the crisis management functions for the utility OIC for internal and external coordination-collaboration, resource authorization, guidance and priorities for restoration or resolution of the crisis. The field DOC's implement the guidance into tactical response assignments to safely resolve the situation.

Note: At this point, the event or incident is estimated to still be within SDG&E's ability to resolve within its resource and financial capability and capacity. This does not mean mutual assistance can't be used. Mutual assistance may be requested to aid in expediting service recovery to customers.

4.4.6 Long Term–Catastrophic Level 1 Incidents or Events Causing Service Disruption Greater than 30 days.

The response organizational structures are already in place from the Level 2 activation. It is expanded to include not only senior level company leadership but also the inclusion of company executive leadership and Board of Directors as well and the potential for Sempra Headquarters Incident Center (HQIC). The EOC leadership team should be the highest skill and experienced level of qualified individuals and have a delegation of authority level to approve the financial and resource requirements that would be necessary at this classification of an incident or event. Mutual Assistance, outside assistance, and contractors would be involved and coordinated as appropriate to support the

restoration of company assets and services. The same operational structure as Level 2 but additional personnel in each position is expanded to accommodate the workload requirements per NIMS management principles and the expansion to include the HQIC, see Figure 15 in Appendix A. The responsibilities of the EOC team are to provide the crisis management functions for the utility OIC for internal and external coordination, collaboration, resource authorization, guidance and priorities for restoration or resolution of the crisis. The field commands, DOC-AC's and District UFC's implement the guidance into tactical response assignments to safely resolve the situation as illustrated in Figure 9 and Figure 10 above.

These concepts are applicable to all company emergency events beyond the primary commodity services disruption and inclusive of physical, cyber, financial, and reputational issues requiring executive company leadership and authority in the response policy decisions, priorities, and guidance roles.

This incident level could exceed SDG&E financial capabilities and thus includes Sempra HQIC involvement.

4.5 Internal Communications

There are two types of operational internal communications, command-directives for action and informational to assist and provide situational awareness to people performing in functional areas of the operation. Command type communications must follow the NIMS principles of Chain-of-Command, so an individual is receiving actionable direction from their supervisors only. Informational or informal communications are shared to make a person aware of things that could affect decisions or safety in a functional area. Informal communications are essential to team building and cohesiveness of operational personnel. This type of communication is shared irrespective of a person's chain of command and does not contain command-directive components. If a person has knowledge that is beneficial to the operation, sharing it is permitted at all levels. If the information is to task a person to action, it must go through the chain of command to ensure unity of effort and cohesiveness within the team. Communications on tasks and operational considerations should be documented to preserve the integrity and performance evaluations after the event. This multi-faceted approach for communication provides quick, reliable, and consistent information to all incident response personnel while ensuring that the appropriate information reaches all intended recipients.

4.6 SDG&E EOC Roles, Responsibilities, and Response Activities

4.6.1 EOC Positions:

Department Name	Description
Emergency Management (EM)	The EM office coordinates SDG&E's all hazard emergency response plans and EOC activations and is the centralized coordination point for ensuring EM and ICS continuity and alignment company wide.
Electric Grid Operations (EGO)	EGO is responsible for monitoring and operating the electric transmission system (69kV and above) in a safe and reliable manner and coordinate planned and unplanned work on the system.
Electric Distribution Operations (EDO)	EDO is responsible for monitoring and operating the electric distribution system, 12kV and 4kV in a safe and reliable manner and coordinating planned and unplanned work on the system.
Customer Success (CS)	The customer Success group is responsible for establishing and maintaining relationships with all assigned account major business customers as well as sending communications and notifications to all customers. This group manages customer expectations and is the conduit for communications.

Department Name	Description
Fire Science & Climate Change	The Fire Coordination group's mission is to keep employees, customers, and first responders safe through fire prevention, incident coordination, and education. Secondly, fire coordinators serve as Subject Matter Experts (SMEs) to assess and mitigate risks associated with Operation and Maintenance (O&M) activities, capital projects, emergencies, regulatory cases, and to increase efficiency throughout SDG&E. Meteorology provides regular weather reporting and prediction consultation for SDG&E operations planning. This weather briefing provides the situational awareness for making operational decisions that support safe and reliable operations.
Wildfire Mitigation and Vegetation Management	Wildfire mitigation at SDG&E is a company-wide, inter-departmental effort involving resources and programs across utility functions. The Vice President of Electric System Operations is the wildfire risk owner and has primary responsibility for owning, executing, and auditing WMP with attachments-SDGE-2023-2025.pdf .
SDG&E Safety Compliance	The safety department keeps employees safe while performing their duties at work and supports employees to mx a safe work environment and implement safe work practices.
External & State Legislative Affairs	The regulatory group serves as a liaison between the CPUC and SDG&E to manage relationships, communications, and compliance with CPUC regulations.
Geospatial Information's System (GIS)	GIS technology is used to study wildfire growth patterns, allowing proactive measures to be put in place before a wildfire. Using simulations generated from weather conditions, historical fire data, and vegetation data, the wildfire risk of SDG&E territory can be evaluated.
Customer Programs	Responsible for medical baseline customer data and analysis. Also responsible for coordination of SDG&E presence in Local Assistance Centers as requested by FEMA, County OES, American Red Cross, or any other local jurisdiction.
Business Services	Responsible for identifying and communicating to those key/major customers to include critical infrastructure customers and critical facilities. Also responsible for identifying, communicating, and managing the support services for those customers that may have access & functional needs during an emergency.
Electric Regional Operations (ERO)	ERO is responsible for field operations including conducting planned work and responding to unplanned work on the electric distribution system. They ensure compliance with the CMP, conduct distribution line patrols and repairs, provide observations in the field during extreme events, provide emergency response for power outages, staff the staging sites, and conduct line patrols for PSPS.
Kearny Mesa	Responsible for coordinating crews for maintenance of substation facilities.
Marketing and Communications	The communications group's goal is to inform and educate customers and the public while complying with regulatory communication requirements. Communications is responsible for coordinating general marketing campaigns, public education campaigns, emergency

Department Name	Description
	messaging, and media communications. They also participate in the EOC during activation.
Gas Operations	Gas Operations provides safe and reliable gas to customers, mx gas infrastructure, ensuring the safety of personnel and customers, and minimizing risk of fires by safely mx and operating gas infrastructure.
Cyber Security	Responsible for deterrence, prevention, and detection malicious code on Company networks and Information Systems. Also provides ongoing Information Security education, training, and outreach
Cloud and Infrastructure	Responsible maintaining the company IT cloud and server network infrastructure. Also responsible for troubleshooting and fixing software and hardware failures in coordination with responsible departments. The EOC IT Unit administers the Emergency Notification System (ENS).
Digital Workspace and Automation	Responsible for customer interface IT platforms, creating customer service IT tickets and elevating issues to major incident management teams.
Regional PA	The goal of regional public affairs is to successfully maintain relationships and communications with regional community and government entities to disseminate information before emergencies and during EOC activations as a result of an emergency.

5 Organization and Assignment of Responsibilities

5.1 SDG&E Overview

As a regulated utility providing energy-related services to customers in the San Diego area, SDG&E conducts real-time monitoring of company systems, customer service reliability, and essential company functions via multiple 24x7 operating centers. Primary among these are Emergency Operations Services, Electric Grid Operations (EGO), Electric Distribution Operations (EDO), Gas Transmission Communication Post (TCP), the Network Operations Center (NOC), the information Security Operations Center (SOC), the Call Center, Meteorology, the Fire Coordination Group, and Corporate Security.

An incident may manifest initially as a deviation from normal operations indicated by the parameters and conditions monitored by these 24/7 centers. As part of normal identification and notification processes for these conditions, these front-line centers follow procedures for notifying the Emergency Operations Services organization to initiate the CEADPP activation process. Prior to activation, the monitoring of overall situational awareness is the responsibility of the Emergency Operations Services organization in partnership and coordination with the groups listed in the section above. Once an incident has been declared, incident monitoring will be the coordinated and data analysis incorporated into the EOC situation unit. Appropriate field Incident management teams may be activated if necessary.

5.2 Field Incident Management Teams

Table 3: Field Incident Management Teams

Team Name	Responsible Area
Electric Grid Operations (EGO) and Electric Distribution Operations (EDO)	EGO transmission and the EDO distribution monitor the company's electric transmission and distribution systems and are responsible for maintaining situational awareness of electric system conditions, reliability of the equipment, and coordinating all planned and un-planned maintenance and construction activities on the SDG&E electric system infrastructure.
Gas Transmission Command Post (TCP)	The TCP monitors gas flows in the gas transmission system, using Supervisory Control and Data Acquisition (SCADA), to assess irregularities and gas transmission system conditions.
Service Dispatch	Referred to as Trouble or Station Y oversees the daily routing, workload balancing and radio communication of Customer Service Field (CSF) and Electric Distribution. Electric Troubleshooters (ETS) and Customer Service Field Technicians are dispatched during the day for routine and emergency work. As a 24/7 organization they work with many company teams and outside agencies, such as local fire and police departments, and 911, to manage emergency and unplanned work.
Network Operations Center (NOC) information Security Operations Center (SOC)	The NOC and SOC perform 24/7 monitoring of all SDG&E networks, applications and critical information technology infrastructure for operating the SDG&E electric and gas system infrastructure as well as normal business operations. These entities coordinate monitoring with the other entities discussed above and have established processes for identification of potential security-related incidents.
Customer Care Center and Corporate Communications	During or in anticipation of an incident, SDG&E's Customer Care Center representatives or social media staff may become aware of incidents through interactions with the Company's customers or the public. These entities shall provide ES and SDG&E leadership with updates on threats or incidents that they may

	become aware of during normal business operations.
Corporate Security Operations Center (CSOC)	Corporate Security performs 24/7 security monitoring of all SDG&E electric and gas facilities, and corporate offices. Corporate Security maintains a Department Operations Center, communications and coordinates with the entities discussed above, along with ES, on security-related incidents.
Fire Coordination Group	The Fire Coordination Group monitors ongoing and potential fire incidents through local fire/police radio systems and scanners.
Emergency Management	Emergency Management provides SDG&E leadership with updates on threats and incidents in the daily briefing, escalating predictions of potential incidents as needed.

5.3 Department Operations Center (DOC)

When an Event Level 3 is declared, the impacted Commodity Operations Desk(s) will be opened. This position(s) is staffed by the Deputy Operations Chief. Its purpose is to help coordinate the movement of crews, equipment, and material between districts, and to provide system-wide information to various groups. It provides resource coordination and prioritization.

Alternate locations for commodity-based operations centers are designated in their individual Business Continuity Plans (BCP). Operational departments and their operation centers are designated as critical and must have no down time. Per Sempra BCP corporate policy, these units are required to test their alternate operation's center locations at least once a year. Department activations of their BCP are triggered by:

- Loss of access to primary facility.
- Cyber security incident or IT failure of critical platforms.
- Employee high absenteeism.
- At the discretion of their operational director or SDG&E Senior Vice President of Electric Operations.

5.4 Executive Notifications During Business and Non-Business Hours

Business or Non-Business Hours	Notification Types
During Normal Business Hours	Notification to EM could come from any of the monitoring entities described in Section 3.4.
During Non-Business Hours	An EM on-duty (EOD) staff member is available during non-business hours. An Emergency Incident Reporting (EIR) text paging service, e-mail, or phone call are the notification mechanisms for alerting the EOD of an actual incident or potential incident. Once alerted, the EOD will contact the notifying party, obtain information, and call the Director of EM, who will then instruct the EOD on what notifications and actions to take.

5.4.1 Executive Notification Process

This section describes the steps that the company will use to conduct an Executive Notification.

5.4.1.1 Objective

The objective of this process is to ensure that appropriate executives receive timely and adequate notice of pending or actual incidents.

5.4.1.2 Roles

The organizations and roles involved in the Executive Notification process include:

- EM
- Officer on Call (OIC on Duty)
- In-Line Director

5.4.1.3 Initiation Criteria

- The Executive Notification process may be initiated based on the following criteria, regardless of the impact on SDG&E's assets or infrastructure:
- At the discretion of EM Director.
- An earthquake of 4.5 or greater within SDG&E's service territory.
- Fires that result in media attention.
- Any building incidents at SDG&E facilities that result in evacuations or cause a potential impact on operations.
- A hazardous spill that reaches a storm drain, is greater than 42 gallons of released hazmat, or injures employees, customers, contractors, or other stakeholders.
- Any loss of a data center.
- Any loss of a portion of communication system.
- A loss of any system impacting company operations or customer service.
- Any civil disturbance or threats of terrorism, including a cyber-attack.
- Any injury requiring hospitalization or fatality of an employee, contractor, or member of the public.
- A forced outage to any transmission asset leading to loss of firm load or that will likely cause the Company to shed firm load.
- Any forced outage to a generation facility.
- A non-momentary outage to a major distribution substation.
- A non-momentary loss of electric service that is drawing media attention in a high-profile area or to high-profile customers.
- Any leak or damage to gas infrastructure or facilities where media is on scene.
- Any leak associated with evacuations or where evacuations are expected and media presence.
- Anytime the Gas Emergency Center (GEC) is activated.
- Where there is damage to a 4" or greater line.
- Where there are excessive area odors; or.
- Where asset damage has reached \$50,000 or more.

5.5 Line of Succession-Continuity of Leadership

A list of qualified and designated executive personnel is kept updated on the company's [Exec COL Plan-SDGE-5 2022.pdf](#) for both the executive leadership and Emergency management department leadership for decision authority to act. Should a leader not be able to perform their designated function, the alternate leadership will be notified to assume that role as necessary. For example, in case of vacation, sick time, or they were not able to be notified. In addition, a

SDG&E Emergency Response Plan Direction Control and Coordination
company senior executive leadership and the emergency services department has an approved Continuity of Leadership (COL) plan identifying the leadership succession. This is identified in the following table 4.

Table 4: Leadership line of Succession

Order	SDGE Position Executive Authority Succession
1	CEO SDG&E
2	President & CFO SDG&E
3	COO SDG&E
4	SVP- External & Ops Support
Order	SDG&E Emergency Management Leadership
1	Director Emergency Management Department
2	Manager Emergency Operations Services
3	Aviation Services Manager
4	Training & Exercise Manager

5.6 Emergency Operation Centers Facility Locations

SDG&E maintains two physical EOC locations and a fully functional virtual EOC. The determination of which location is activated is based on a variety of criteria to include, but not limited to, employee safety considerations, facility safety, operational capability of the site, ability of staff to respond to the site, and which EOC type (physical or virtual) is best suited for the incident.

The primary SDG&E EOC is located at: 	The alternate EOC Facility is located at: 
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The EOC may also be constituted virtually through Microsoft Teams at the request of the OIC or Emergency Management Director authority level, see Appendix D.

6 Direction, Control and Coordination

6.1 Emergency Management Department

SDG&E's Emergency Management department is responsible for ensuring that emergency preparedness, management, and comprehensive incident response is a core business competency at SDG&E. EOS administers the company's CEADPP, coordinates emergency exercises, and reviews organizational emergency plans, as needed, to ensure compliance with company policies and governmental regulations. EOS will take the lead to do the following:

- Establish and instill leading EM standards and practices (e.g., Incident Command System), in collaboration with gas and electric operations and external partners.
- Clarify response organization roles, responsibilities, and authorities to focus field command accountability and improve decision-making.
- Ensure response plans are in place to address the highest risks.
- Bring together disparate documentation into logically organized, detailed, and accessible response plans.
- Deliver Standard Operating Procedure (SOP)-based response training.
- Manage and maintain the Emergency Operations Centers.
- The Training & Exercise Division of the EM department is responsible for development, centralization, and alignment of ICS company wide.
- Provide a variety of training and exercises to test and improve response effectiveness; and
- Apply and expand upon indices such as Fire Potential Index, predictive tools, and analytical capabilities to enhance situational awareness before and during an incident.

6.1.1 Emergency Response Roles

Incident response is a corporate and individual responsibility. Employees have an obligation to respond to incidents as directed by SDG&E management. As a result, a significant number of employees are trained on and have been assigned response roles. During emergencies and crises, these personnel may work extended hours to support 24-hour staffing. For purposes of this document, a response role is defined as a role or task that a person performs during an incident that is under the EM supervision and/or of the EOC or utility OIC.

6.2 SDG&E Response Organization

6.2.1 Overview of Teams

SDG&E relies on its Incident Response Organization (IRO), which is comprised of key employees holding assigned roles, to respond to and manage incidents, with roles and responsibilities divided by functional area. SDG&E uses ICS as the foundation for its incident response organization and the management of its incidents. We use EOC position checklist to aid in understanding their assigned duties found in Appendix B. The Company shall have:

- **A Headquarters Incident Center (HQIC)** – The Sempra level entity that may be activated for incidents affecting multiple business groups, or where an incident is of significant scope or complexity (e.g., 2007 wildfires) and could impact Sempra financial stability, brand, or reputation and is utilized when the capability and capacity of SDG&E may not be sufficient to resolve the situation.
- **An Executive Management Team (EMT)** – Includes SDG&E senior executives who provide policy level direction, support, and strategic leadership that focuses on SDG&E's financial, brand, and other significant corporate risks that severe/catastrophic incidents may present in the mid- to long-term but the impact to SDG&E is within capability and capacity of organization to resolve. The Officer in Charge (OIC) is considered part of this team and the point of collaboration between the EMT and the EOC.
- **A Utility Field Commander (UFC)** - Responsible for the tactical and operational response to the incident site and is led by the commodity-designated leader at the field site, group supervisor or at the district management level. Multiple UFC's may be activated during incidents that are geographically dispersed or affect multiple lines of business. These are used to resolve on scene requirements for authorized leadership presence.
- **An Incident Support Team (IST)** – An assistance team of ICS qualified members to support UFC's in the field or Districts or Level 4 EOC operations. They provide the subject matter expertise to advise, liaison to first responder IC's, provide safety officer role and media support. The team acts in a command staff role when needed to provide the technical support.

Collectively, the teams above comprise the incident response, which is scaled up or down depending on incident size and complexity. The teams noted above are set up to promote scalability both within the teams and within the overall response structure. For example, a UFC(s) may be activated to provide on scene Utility Field Command at a gas blow

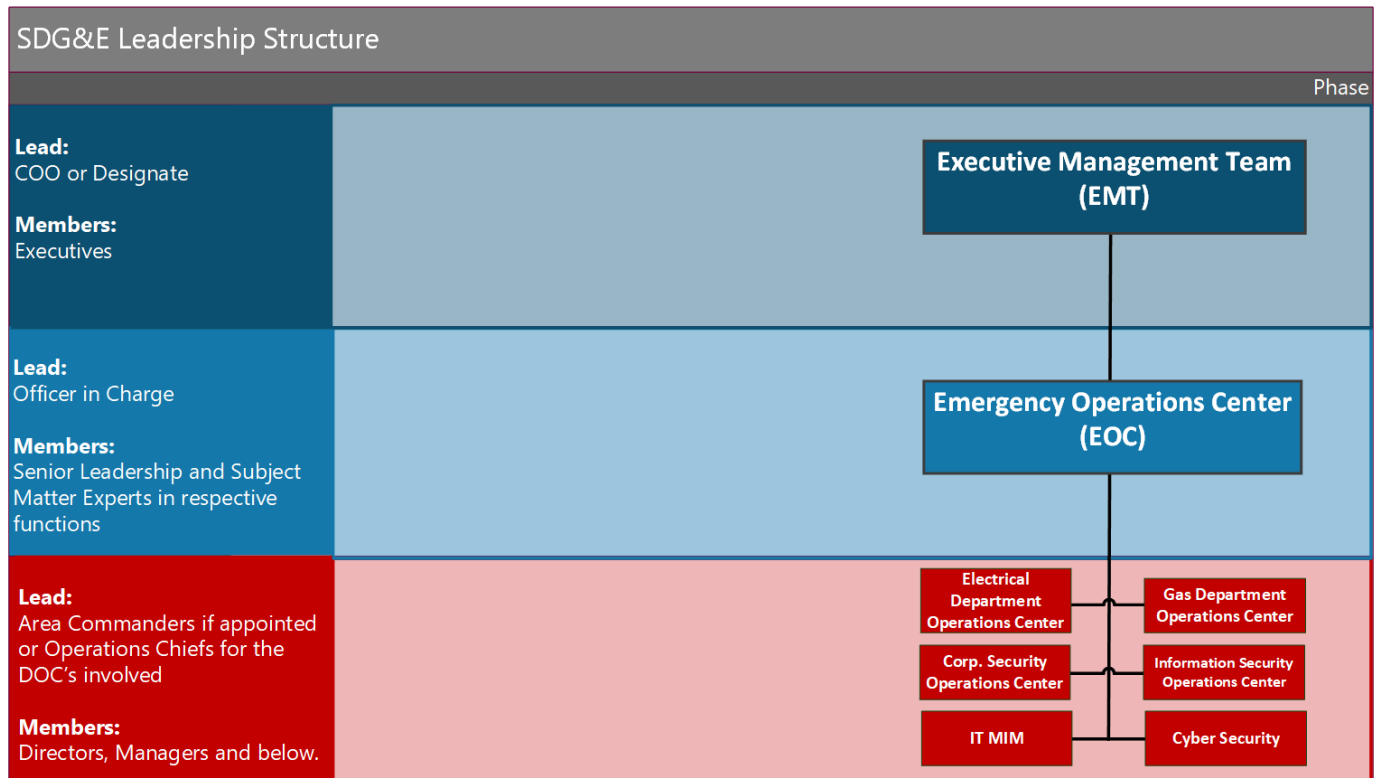
SDG&E Emergency Response Plan

out site, coordinating with local first responders, but no additional teams or even EOC involvement may be necessary if it falls into a normal work response.

The UFC would have overall management authority for both the tactical response and support functions and may call in an IST for additional expertise and support as needed. If the EOC is activated, the designated executive utility Officer in Charge (OIC) would have authority over all guidance functions, including ensuring that UFC's and Area Commanders operational activities are coordinated and would have responsibility for the tactical or operational response.

The sections that follow provide additional detail on each of these teams, with detailed roles and responsibilities on each team described in the EOC Position Guidance Documents providing checklists for each position.

Figure 11: SDG&E Leadership Structure – Overview



6.2.2 Sempra Headquarters Incident Center (HQIC)

The HQIC, which is comprised of Sempra senior executives, may be activated in the event of an incident that has the potential to or already has affected:

- Sempra's reputation,
- Financial stability,
- Presents significant corporate risks that the incident may represent a mid- to long-term disruption period.
- Alternately, the incident is of such magnitude that it may exceed the capability and capacity of SDG&E.

The HQIC works with SDG&E EMT leadership to develop and approve the strategic guidance that will be utilized by the utility OIC and the financial authority to manage the resources necessary, mutual aid, CUEC, contractors etc. It is important to note that the overall tactical management of any incident and responsibility for decision making and oversight of field response operations under the rests with the UFC(s) and Area Commanders if activated. The strategic guidance they follow, as determined by the HQIC and EMT, is communicated by the utility Officer-in-Charge to the field commanders. The composition of the HQIC will depend on the type of incident, businesses affected, and strategic and policy needs as determined by Sempra.

6.2.3 Executive Management Team (EMT)

The EMT, which includes SDG&E senior executives, provides SDG&E:

- Focused policy level direction guidance support.
- Strategic leadership, focusing on financial, brand, and other significant corporate risks that the incident may present in the mid- to long-term period.
- For some types and levels of emergencies, the EMT has responsibility to interface with the Crisis Management Center at Sempra.
- Determines if the situation can be resolved within the capability and capacity of SDG&E.

Important to note is the overall tactical management of any incident and responsibility for decision making and oversight of field response operations under the Incident Management Teams rests with the Utility Field Commander(s) and Area Commanders if activated. The strategic guidance they follow, as determined by the HQIC and EMT, is communicated by the utility Officer-in-Charge to the field commanders. While the designated utility commander's DOA specifies their authority, the executives, which grant that authority may rescind it at any time and replace or resume their own authority and responsibilities. The composition of the EMT will depend on the type of incident, businesses affected, and strategic and policy needs of the SDG&E.

6.2.4 Partial, Full or Virtual Activation of the EOC in Support of the OIC

The EOC response staff and leadership is used to support the OIC when the EOC is activated at a Level 3 or higher activation event. The Command and General Staff of the EOC and any requested Subject Matter Experts (SME) will form the members of this team and convene either in the EOC or virtually as the OIC requests. This team works at the direction of and support to the OIC to develop the appropriate incident response:

- Information Collection, Situational Awareness, and Analysis from SDG&E support units.
- Documents the event situation and Significant Courses of Action approved by the OIC and SDG&E units responding to the event.
- Contacts and notifies appropriate government, regulatory agencies, community agencies and customer services as required by the type of event and SDG&E responses to protect public safety and company personnel.
- Coordinates with the appropriate SDG&E units to facilitate an effective and efficient response to the event.
- As the event expands, the OIC will call for a higher-level activation of the EOC to manage the response more effectively to the event, Level 2 or Level 1 EOC staffing and coordination activation. The EM Advisor

SDG&E Emergency Response Plan Direction Control and Coordination

usually, the leader of the EM department, will assist in establishing the EOC at the appropriate activation level and brief the incoming activated EOC personnel on the current situation. The OIC / EM Advisor may also determine if it would be appropriate to require a virtual EOC activation instead of physical operations in the EOC facility. If selected, the planning section will follow the Virtual EOC Activation Procedure referenced in Appendix D.

6.2.5 Notification Group

The Notification Group, led by the Deputy Officer in Charge, is a function within the EOC where personnel with communication responsibilities perform critical emergency information functions and crisis communications. The Notification Group's purpose is to bring together a focused set of resources that can meet the heightened demand for speed and volume in communications, with the aim of supporting SDG&E stakeholders. The Notification Group brings together – and serves as a support team for – the various functions from all internally- or externally-facing organizations or business groups that the incident may require.

The role of the Notification Group is to communicate the nature and extent of the crisis to stakeholders and the effect of the event on SDG&E's business and customers, and to provide updates on response efforts.

Communicating effectively to external stakeholders, customers, regulators, elected officials, media, etc. and employees and contractors is as important as responding to the incident and ensures regulatory compliance. During an incident, the Notification Group will strive to do the following:

- Promptly acknowledge the incident with a commitment to provide stakeholders more information. Timing is appropriate to type of incident.
- Speak with one voice to provide a consistent message to all stakeholders.
- Be transparent by proactively offering a continuous stream of updated, relevant information.
- Reach all stakeholders by communicating across every possible channel; and
- Tell our story leveraging visual communications and third-party support to help tell that story.

The Notification Group organization should be scalable and may be activated, when incident scope or complexity warrant it, by the Planning Section Chief or a delegate.

The notification group can be made up of representatives from the following list:

- | | |
|-------------------------------------|----------------------------|
| • Public Information Office | • Customer Service |
| • Liaison Officer, Regional Affairs | • Planning Section |
| • Regulatory | • GIS |
| • Legal Office | • Customer Resource Center |
| • ENS | • AFN Unit |

6.2.6 Incident Management Concepts

As noted previously, the DOC Area Command – District UFCs are responsible for the company's operational and tactical response to any type of incident. These would either be a local or field entity, run directly from the appropriate district that includes trained personnel capable of responding to incidents that are resolved within one operational period or within a few hours after resources initially arrive on scene. A full-scale district UFC response with district section chiefs would be activated for an extended complex district event along with the full EOC management support team. If multiple districts are involved, a DOC Area Command and District UFC structure would be employed to manage the incidents.

A local UFC reporting to the district may be used where:

- Only a small number of customers are affected.
- The incident duration is short.

- The incident is not complex.
- Only a small number of external entities or stakeholders are engaged; or
- Where the on-scene Utility Field Commander does not need external resource or other support.
- Local UFC's may initially manage larger and more complex incidents prior to activation of a full District incident response.

A district-wide level UFC event using its Operations, Logistics, Planning and Finance sections is utilized for complex multiple incidents requiring district level management and oversight. This would comprise between 10 and 35 trained personnel, would typically be activated to support incident management at incidents that extend beyond one operational period. It would manage major and complex incidents requiring a significant number of resources and would typically require the development of written Incident Situation Report. Their involvement would be necessary when the incident would include one of the following:

- Have the potential to negatively affect SDG&E's brand or reputation.
- Affect a moderate to large number of customers.
- Require resources from across SDG&E or from external entities.
- Require coordination and outreach with external stakeholders.
- Are complex.
- Affect multiple sites, life threatening, or deaths are involved; or
- Are expected to last for multiple days.

A full-scale DOC Area Command structure may also be activated for planned mass-gathering type of events such as festivals, political rallies, civil unrest, state and national summits and conferences or when a complex incident involves multiple district level responses.

6.3 Incident Management

The SDG&E operational and tactical response is managed by Utility Field Commanders, UFC's, district level or local field supervisors, while the OIC manages the EOC, which ensures that responses across the entity are coordinated, external regulatory notifications, company media communications and provides resource and other support to the operational or tactical response. The OIC is responsible for overall guidance, priorities, policy direction and conformance to SDG&E policies. The EOC ensures information coordination and resource requests across operational or tactical response teams, while allowing each response team to retain its own authority and ability to manage the tactical response. If the utility OIC does not believe the authority should be retained by the Utility Field Commander(s), UFC's or DOC-AC's, then the utility OIC must transfer command of the affected UFC and AC to a new commander that has the appropriate qualifications for the situations. The utility OIC should consider replacing the Utility Field Commander when any of the following happen:

- The operational and tactical response is being mismanaged.
- The Utility Field Commander (UFC and AC) has created or allowed the creation of unsafe situations for the public and staff; or
- The Utility Field Commander (UFC and AC) is violating company policies.

The utility OIC should not, however, replace a Utility Field Commander because the OIC may prefer an alternative management style or disagrees with a tactical decision. SDG&E should conduct an evaluation of performance after each incident in which all key decisions are revisited and each person in a leadership role would receive feedback on performance.

Table 5: Responsibilities of Utility Field Command and Utility Officer-in-Charge

Area	Utility Field Command (UFC) DOC Area Command (AC)	Utility Officer-in-Charge (OIC)
Overall	Sets operational incident objectives, in accordance with the corporate strategies and priorities from the OIC. Responsible for the tactic field operations, personnel, and resources.	Directs the corporate level support of field incidents. Provides overall priorities, strategic and policy guidance for activated ISTs and DOC's
Resources	Identifies and assigns resource allocations to meet the operational objectives and in accordance with OIC leader's intent and guidance. Approves the release of resources from the assigned incident branch.	Makes corporate resources allocation and prioritization decisions between and among operating companies and service areas in coordination with the Deputy OIC Leader and DOC activated units.
Incident Classification	Provides information and data to consider in incident level classification.	Participates in incident assessment and classification. Approves the activation level.
Planning	Leads, schedules, and facilitates planning meetings and status briefings for the tactical operations and develops the EOC Action Plan.	Leads, schedules, and facilitates planning meetings and status briefings for the EOC. Develops SDG&E-wide incident situation report, considering field DOC ISRs.
Operational Role	Manages the operational and tactical, or field response to an incident. Assigns resource allocations and approves IAP's.	Monitor's incident operations to identify current or potential organization problems. Provides corporate guidance to field commands.
Communications	Provides OIC with operational information to support communications in Incident Situation Reports.	Develops communication strategy, determines information needs and ensures communications are provided to customers, media, and government agencies through one voice and timely.

6.3.1 Transfer of Command

When command is transferred during an incident, UFC's, AC's or EOC Commanders, either because the incident has escalated and requires a greater level of certification or because the individual filling the position needs to be relieved due to a gap in knowledge, physical inability to continue in the response, or ineffective leadership, a formal transfer of command should take place. The steps to be taken during a transfer of command include the following:

- Face-to-face, in person or virtual briefing between incoming and outgoing individuals before command transfer.
- Consideration of re-deployment of relieved commander if relief was involuntary.
- Verbal confirmation of the transfer between commanders; and
- Announcement of the transfer to the response organization.

The essential information that the outgoing commander should cover in the briefing to the incoming commander includes an overview of the response objectives, plan for the current period and updates on the status of each key functional area of Operations, Planning, Logistics, Administration and Finance, Communications, and Safety.

Each EOC position also has a required Transfer of Command sign out function to document transfer of position to incoming staff.

6.4 Response Team Coordination

For the sake of clarity, a matrix of organizations and areas of responsibility, including functions should be included to summarize primary and supporting roles by teams. These shared general responsibilities, such as developing Incident Situation Reports, should not be neglected, and are developed in the table below. This section should also describe at a high level the relationship between the various response teams EMT, DOC-AC and District UFC's, Field Crews.

Table 6: Team roles and Responsibilities

Responsibilities and Tasks	Field Commands (UFC's and AC's)	Officer-in-Charge (OIC)	EOC Response	Executive Management Team
	Incident Management			
Members	District managers field supervisors DOC managers	Designated company VP's	Level 3 activation command and general staff SMEs as required	Senior executives and executives
Overall Responsibility	Tactical and operational response	Policy, strategic guidance, and support to field commanders Directs EOC staff and functions	Support and coordination to OIC in Level 3 activation or above	Policy and strategic support and leadership
Leader	Designated UFC's or DOC AC commanders	Designated Officer in Charge	Officer in Charge	CEO or designate
ICS Equivalent	IMG-IC and or AC	EOC Director	Command planning group	Policy group
Functions	Incident operations planning logistics		OIC support in Level-3 operations, logistics, legal planning, and analysis operations	Level 2 or above EOC activation when corporate business functions or

Responsibilities and Tasks	Field Commands (UFC's and AC's) Incident Management	Officer-in-Charge (OIC)	EOC Response	Executive Management Team
	administration and finance		of affected businesses, internal and external stakeholder communications or notifications	reputation could be affected
Assigned Location	Field, incident site or DOC-E, DOC-G	Emergency Operations Center	Emergency Operations Center or Virtual EOC	HQIC
Incident Situation Report Development	Tactical elements of Incident Situation Report (ISR)	Strategic incident guidance, priorities, policies, strategic resources	Incident response report and SA External information coordination, EAP	Business impact and policy guidance

Two distinctions are required for the term's strategic guidance versus the operational term strategies that will be employed on an operation.

6. **Leadership Strategic Guidance:** Refers to which **methods** are authorized for use by the field commanders in managing the tactical direction to be employed.
7. **Field strategies:** These include which of those possible authorized methods the field command has instructed its operation section to utilize in developing the TACTICS or actual actions the field crews will utilize, which defines the amount of the resources necessary to carry them out, that will be needed by the resource teams to resolve the situation within the operational period defined.

The field commander then looks at the resources available in those categories and if there is a safety issue in their affected Area of Responsibility (AOR). They see that there is a pandemic or health issue and therefore cannot use CCS and are left with the other options. If sufficient other options will resolve the issue, then they plan the tactics on how to get those folks accommodated. If there are not sufficient resources, the field commander will inform the guidance group that they need Non-Congregant Shelters (NCS) and the headquarters team will change the strategy to accommodate the situation.

SDG&E has many policy strategies to consider using during an event. The leadership policy group can authorize methods or strategies for de-energization, switch circuits, gas pinch off, shut down gas lines, grid stabilization, replacement of equipment, fire coordination, repair, and restoration etc. This group determines what methods and under what conditions they can be utilized to allow the field command to resolve the situation effectively and within the company's capability and capacity.

6.5 EOC activation Level 3 Overview

The activation of the EOC to Level 3 is comprised of nine functional groups, part of the Command and General Staff or other SMEs as requested by OIC, led by Section Chiefs, who represent business units that may be affected by an incident.

- The Section Chiefs are responsible to the OIC for managing their groups and providing operational and policy **support** to the field activated UFC's and DOC-AC's.
- Those reporting to Section Chiefs are responsible for obtaining and processing information and requests internally and externally.

6.6 EOC Incident Support Roles and Responsibilities

Following are brief descriptions of the SDG&E Incident Teams lead roles. For additional detail about each of these roles and the remaining roles on the SDG&E EOC Level 3, read the Position Guidance Documents, located both on MS Teams files and physically located at the SDG&E Emergency Operations Center, which contain position-specific checklists. SDG&E shall have individuals assigned to these roles pre-identified and available 24-hours a day, as incidents occasionally occur without warning.

6.6.1 Utility Officer-in-Charge (OIC)

The designated executive utility Officer-in-Charge (OIC) is responsible for directing the corporate level support of field incidents and providing overall strategic guidance for the activated UFC's and AC's. The OIC will be designated by SDG&E executive leadership, provided a Delegation of Authority document identifying their authority, identified prior to the incident and have the capability of supporting an incident from a holistic perspective. This includes support not only of the operational aspects of a response, but also planning, customer issues, media issues, administration and finance, information technology, legal, etc.

6.6.2 EM Advisor

The EM Advisor is responsible for providing the OIC with, strategic response input and Cal OES compliance guidance as requested.

6.6.3 Logistics Services Coordinator Lead

The Logistic Service Coordinator Lead is responsible for coordinating logistical and business support response activities across responding teams, providing support, where requested or required, and coordinating between Business Support staff and the OIC. This support encompasses facilities security, transportation, supplies management, and the provision of food and lodging.

6.6.4 Legal Officer Lead

The Legal Officer Lead is responsible for providing legal advice on all aspects of the incident and SDG&E's response thereto.

6.6.5 Planning Section Chief Lead

The Planning Section Chief Lead is responsible for maintaining, gathering, disseminating information on the current and forecasted situation and the status of resources assigned to the incident, including through development and oversight of the Incident Situation Report. In addition, the Planning and Analysis Strategic Lead provides subject matter advice related to emergency management, as directed, and requested by the OIC and Strategic Leads during an incident. This advice may address roles and responsibilities, processes for activation, notification, demobilization, procedures, and tools. The Strategic Lead will observe performance throughout the response to provide observations and feedback during the incident debrief and After-Active Review.

6.6.6 Gas Operations Commodity Liaison Lead

The Gas Operations Commodity Liaison Lead acts as the liaison between the EOC and the tactical Gas operations, provides support to the Gas Operations Response Team, as needed, ensures the preparation of operational plans, supports the request of resources, monitors progress, makes changes to the Incident Situation Report, and reports to the OIC.

6.6.7 Electric Operations Commodity Liaison Lead

The Electric Operations Commodity Liaison Lead acts as the liaison between the EOC and the tactical electric operations, provides support to the Electric Operations Response Team, as needed, ensures the preparation of operational plans, supports the request of resources, monitors progress, makes changes to the Incident Situation Report, and reports to the utility Officer-in-Charge.

6.6.8 Liaison Officer–External Affairs Lead

The Liaison Officer–External Affairs Strategic Lead oversees EOC External Affairs staff, manages external affairs activities, acts as a liaison between agency representatives, local municipalities, elected officials, and tribes providing accurate, timely and consistent information, and is coordination point for external partners.

6.6.9 Liaison Officer–AFN

The Liaison Officer–AFN oversees EOC AFN staff, manages the AFN support model program by coordinating with partnering Community Based Organizations and providing accurate, timely and consistent information to magnify SDG&E messages to the partner constituencies.

6.6.10 Digital Media Lead

The Customer Communications Lead oversees the operation of applicable call centers and coordinates with EOC and Customer Care Center staff to ensure effective response to customer calls, including through the provision of Estimated Times of Restoration. In addition, the Customer Service Strategic Lead shall ensure that the Customer Service group adequately manages and responds to Key/Major Account issues that may arise during an incident.

6.6.11 Digital Media Lead and Public Information Officer (PIO)

The role of the Digital Media Lead and Public Information Officer is to be the single voice of the organization(s) involved in the emergency response. The PIO is responsible for interfacing and providing incident information to the public, media, internal stakeholders, other agencies, etc.

6.6.12 Safety Officer Lead

The Safety Officer Lead oversees the safety, security, and well-being of the company during a response. This position also works with the different leads to understand the different Human Resource issues the organization is dealing with and addressing them.

6.7 Information Collection, Analysis and Dissemination

This function is performed in the Planning Section to collect situational awareness information, Essential Elements of Information (EEI), Meteorology, Safety, operational documentation, and report formatting / document archiving for distribution to response operations / executive leadership.

6.8 Internal Coordination

When an emergency event occurs, the EM department is responsible for determining the level of emergency, activating the EOC, and notifying EOC responders. The EM department, in consultation with the OIC, will determine the appropriate levels of emergency activation, event classification Levels 4 through 1. EM notifies key departments that a major event is forecast or in progress that may significantly affect the gas and electric system. At every event level, each department has specific responsibilities that will allow the company to prepare for such an event in an organized fashion.

When an event Level 3 is activated, the impacted Commodity DOCs will be activated. This position(s) is staffed by on-call duty personnel and its purpose is to help coordinate the movement of crews, equipment, and material between districts, and to provide system-wide information to various groups. It provides resource coordination and prioritization.

If needed, the Customer Section Chief will coordinate with Customer Programs to ensure Customer Contact Center have adequate staffing and correct information to handle increased call volumes.

6.9 External Notification Coordination

The following notification processes and protocols are in place for incidents or events:

- Once notified of an emerging event, SDG&E will coordinate internal activities in the EOC or via the MS Teams Virtual EOC platform.

- Once criteria are met to activate the EOC beyond a monitoring stage, SDG&E will initiate an operational conference call to assess the event, determine the type and level of EOC activation. Once the EOC activation has been decided, with appropriate operational, planning, logistics, finance, customer service, and command staff available, the EOC responders will begin the incident planning process to establish operational periods, notification criteria and taskings.
- A notification group comprised of the EOC's Public Information Officer, Government Liaison, Customer Care, and Planning Section Chief will begin coordinating messaging, timing, and stages of notifications to customers, public safety partners, jurisdictions, elected officials, and critical infrastructure agencies. Notifications may be sent as phone calls, SMS texts or emails to customers. Notifications to external stakeholder points of contact are typically via email.
- Resources allocated to emergency events are approved by the utility OIC and coordinated through the UFC and AC operations section chiefs of the responding commodity. The OIC will coordinate with operational field commanders for either gas or electric to ensure restoration of power and gas follow the priorities set.
- Priorities for re-energization are hospitals, critical infrastructure, public safety, cool zones¹, and schools.

6.10 Independent Service Operators (ISO)

SDG&E deals directly with the ISO. This procedure is under the overall jurisdiction of the California Independent System Operator (CAISO). Proper and timely communication with the CAISO is required. See *ISO Operating Procedure 4610*.

6.11 EOC Activation / Deactivation Triggers

All the SDG&E EOCs are maintained and ready to activate 24/7/365. The tables below outline the activation triggers and authorities which decide which EOC type to open followed by the criteria to deactivate those functions.

Trigger Type	Trigger Description
Triggers for EOC Activation	The EOC will be activated if any of the following occur: • If there is a Red Flag Warning or Fire Potential Index (FPI) rating of 14 or higher along with forecasted strong Santa Ana winds from the National Weather Service (NWS). • Multiple business units are required to respond and the EOC activation can assist in the response coordination. • A State-of-Emergency exists, either as proclaimed by the Governor of California or County Proclamation. • Any wildfire, which may impact SDG&E critical infrastructure, Levels 1, 2 or 3. • In response to any condition that requires SDG&E to perform PSPS within its service territory. • CAISO issued EEA-1 or higher defined in the Electrical Load Curtailment Redbook • Mutual Assistance is approved to deploy SDGE personnel.
Authority for EOC activation	The EOC may be activated by any of the following SDG&E positions: • Any Vice President who is designated to be the Officer-in-Charge during the event. • Sr. Vice President of SDG&E. • The current On Duty OIC • Director of EM in support of Emergency on Duty staff.

¹ Designated by County of San Diego Health and Human Services Public Health

The EOC is deactivated on the authority / command of the OIC once the threat and activation criteria has subsided and meets their assessment of being within the normal operating parameters of SDG&E commodity services. This assessment is based on the level of threat of SDG&E's commodity assets which could affect public safety / property damage and sufficient repair of the assets to provide restoration of services to the public.

6.12 Critical Resource Programs

For field response and safety coordination, the Construction & Operations (C&O) Centers are responsible for the prioritizing the repair and restoration of service in their district, damage assessment, coordination with the Electric Distribution Emergency Operations Desk, and the management of resources and equipment necessary to restore service as quickly and safely as possible.

The C&O Manager is responsible for the repair and restoration of service within the district boundary. The District Assessment Coordinator is responsible for the following:

- Assessment of overall damage to the district.
- Calls out primary and secondary assessors (a.k.a. field crews).
- Assigns personnel to assess damage.
- Prioritizes emergencies.
- Makes sure expectations are clear to the field crews and ensures that field crews are briefed on SAFETY: Field crews are to understand that wires down or exposed conductors are to be considered energized unless identified, isolated, tested dead, and grounded. They should be informed that downed or exposed conductors could become energized without warning in storm conditions or other emergencies. Field crews should ensure that the public does not go near downed or exposed power lines or equipment.

6.12.1 Safety Considerations

Safety of all personnel, both fields, EOC responders and contractors, is the number one priority of SDG&E. SDG&E looks to never compromise safety and takes all responsibility for safe and healthy behavior. To support this vision, the Safety Services department develops, administers, and oversees employee safety policies, standards, programs, and training. It also manages the contractor safety program.

Safety Considerations for field crews and EOC responders to prevent work related injuries include:

- Behavior based safety
- Contractor safety
- Defensive driving
- Ergonomics
- Office safety
- Equipment inspections
- Product approval
- Environmental safety
- Mental wellness

6.12.2 Restoration Priority Guidelines:

Restoration priority guidelines include consideration of the following:

- Emergencies - Life Threatening.
- Special Cases - As defined by Operations Manager.
- Primary Electric Outages - Generally, set assessment and restoration priorities so that service is restored first to critical and essential customers so that the largest number of customers receive service in the shortest amount of time.
- Non-Primary Electric Outages - Emergency Agencies standing by and equipment damage not related to primary outages.
- Transformer Outages.
- Single-No-Light outages.

6.12.3 Damage Assessment

System-wide damage assessment at the onset of the emergency is extremely important and the information can be difficult to collect. A network software application called Oracle Utilities Network Management System is being utilized to assist with this process and to provide estimated restoration times. The District Assessment Coordinator is responsible to immediately assign resources to the damage assessment process. Personnel may include, but not limited to; Electric Troubleshooter, Working Foremen, Linemen, Construction Supervisor, Project Coordinators, and Planners.

Once the assessment is completed, the assessment is updated on either the Oracle Utilities Network Management System or the Service Order Routing Technology (SORT) application. The updated information is passed to the Oracle Storm Management application within the Oracle Utilities Network Management System and focal Point. The purpose of utilizing these two systems is intended to provide data on current and completed backlog to the Distribution Electric Emergency Operations Desk so that assessment of damage system-wide can be accomplished and staffing levels can be adjusted accordingly.

There is a PSPS specific program called EPOCH used for collecting damage assessments directly from the field. Once the submittals from the field are reviewed and approved, the EPOCH collected data connects SPARC, which then creates a repair ticket which is then submitted and managed through Oracle.

6.12.4 Mutual Assistance:

The energy industry has a strong track record of maintaining high levels of service and reliability. At times, however, events such as earthquakes, firestorms, hurricanes, and other natural disasters occur that cause significant and widespread damage to the electric grid and / or natural gas infrastructure that creates widespread power outages to the end user. These events could also cause significant damage to the gas transmission and distribution systems creating the potential for unsafe operating conditions (i.e., over pressurization), gas leaks, and large-scale outages. Following these events, gas and electric utilities must respond safely, swiftly, and efficiently to restore service to its affected customers. Restoring power after a major incident is a complex and difficult task. A speedy restoration requires significant logistical expertise, skilled line workers and assessors and specialized equipment on a large scale. During such events, utilities turn to mutual assistance and the mutual assistance network for the added resources to help speed restoration.

Mutual Assistance is an essential part of the energy industry's contingency planning and restoration process. Utility companies impacted by a major outage event are able, under Mutual Assistance, to increase the size of their workforce by 'borrowing' restoration workers from other companies. When called up, a company will send skilled restoration workers along with specialized equipment, oversight management and support personnel to assist the restoration efforts of a fellow electric/gas service company. SDG&E has four Mutual Assistance Agreements for the following areas/regions:

1. California: See Appendix 4 for Mutual Assistance Agreement Among Members of the California Utilities Emergency Association (CUEA)
2. Western U.S.: See Appendix 5 for Western Region Mutual Assistance Agreement for Electric and Natural Gas Utilities
3. Nationwide: See Appendix 6 for Edison Electric Institute Mutual Assistance Agreement
4. AGA (American Gas Association) national mutual aid agreement

The SDG&E Officer in Charge (OIC) for assessing and advocating for mutual assistance and will, with the EOC support:

- Notify Emergency Operations Services that mutual assistance is being considered and request informal inquiries to other utilities be made.
- Determine resource needs from discussions with the districts, the outage forecast data, the storm forecast and resource shortages.
- Hold discussions with the Vice President of Electric System Operations, the Senior Vice President of Electric Operations, Director of Electric Operations, Director of Construction Services, Manager of Emergency Services and the Emergency Operations Services' Representative regarding the need for mutual assistance and obtain approval to request.

Considerations triggering these discussions include, but are not limited to:

- All SDG&E crew resources have been or will be committed.
- All local contract crews have been or will be committed.
- The restoration times for primary outages are forecast for 24 to 36 hours.
- Storm intensity is forecast to last another 48 hours.
- Concurrent outage impacts nearing ten percent of SDG&E's electric customers.

It is the standard procedure during an EOC activation for a major event to evaluate as soon as possible if there would be a need for mutual assistance.

7 Communications

Internal and external communications are a key part of any response to an emergency. However, they are separate but equally important efforts. Internal communications are targeted at ensuring a comprehensive and coordinated response. External communications are to ensure our customers, community partners, and public safety remain fully informed of our effort to respond and resolve any hazard affecting SDG&E. Internal communications are essential for emergency coordination across departments and command levels.

7.1 Internal Communications

When an emergency event occurs, which requires a company coordinated response, the EM department is responsible for assisting executive leadership in determining the level of emergency, activating the EOC, and notifying executives, relevant directors, managers, and EOC responders. Internal communications between operational department management and field personnel have specific procedures will allow the Company to prepare for such an event in an organized fashion.

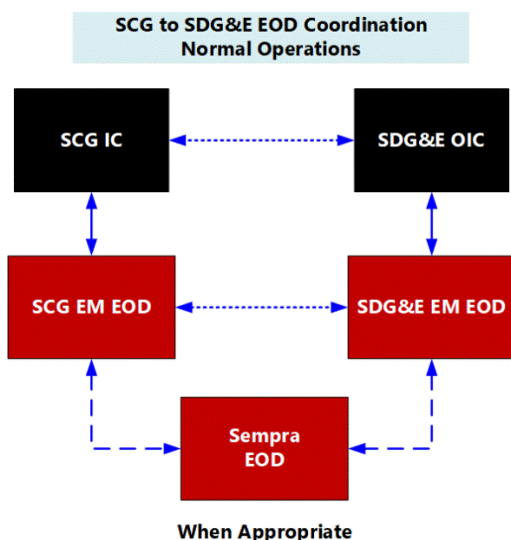
In the event of an EOC activation due to an unpredicted major emergency, a full EOC responder workforce will be notified via SWN and email system. Details for the company-wide communication procedures and auxiliary communication procedures are detailed and referenced in Annex A Crisis Communications and Emergency Communications Tools Plans.

7.1.1 Affiliate Communications

7.1.1.1 SoCalGas

SDG&E and SoCalGas (SCG) maintain 24/7 communications capability to ensure coordination of gas emergencies whenever they occur. The communications between SDG&E and SCG are through our organizations 24/7 Emergency on Duty (EOD) call desk and our EOC's when activated. Our District gas engineers also utilize the EOD system when field emergencies arise. This is represented in the diagram below.

Figure 12: Standard Emergency Coordination SCG-SDG&E



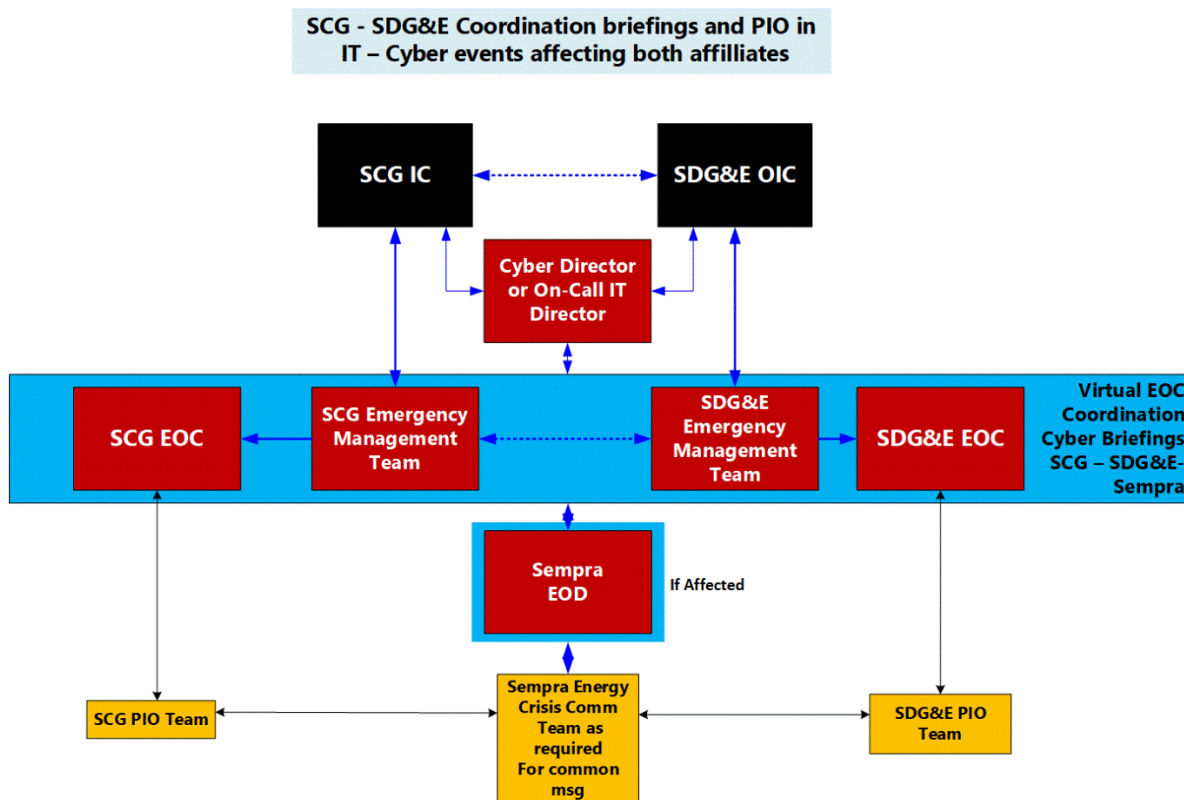
7.1.1.2 Sempra Corporation Coordination

When an event is considered sufficient for SDG&E EOC to be activated to a Level 1 status, coordination with the parent company Sempra is also activated. The Sempra designated employee on call is notified and will coordinate with the HQIC to link it with SDG&E OIC and senior executive leadership.

7.1.1.3 Joint intercompany Communications Coordination

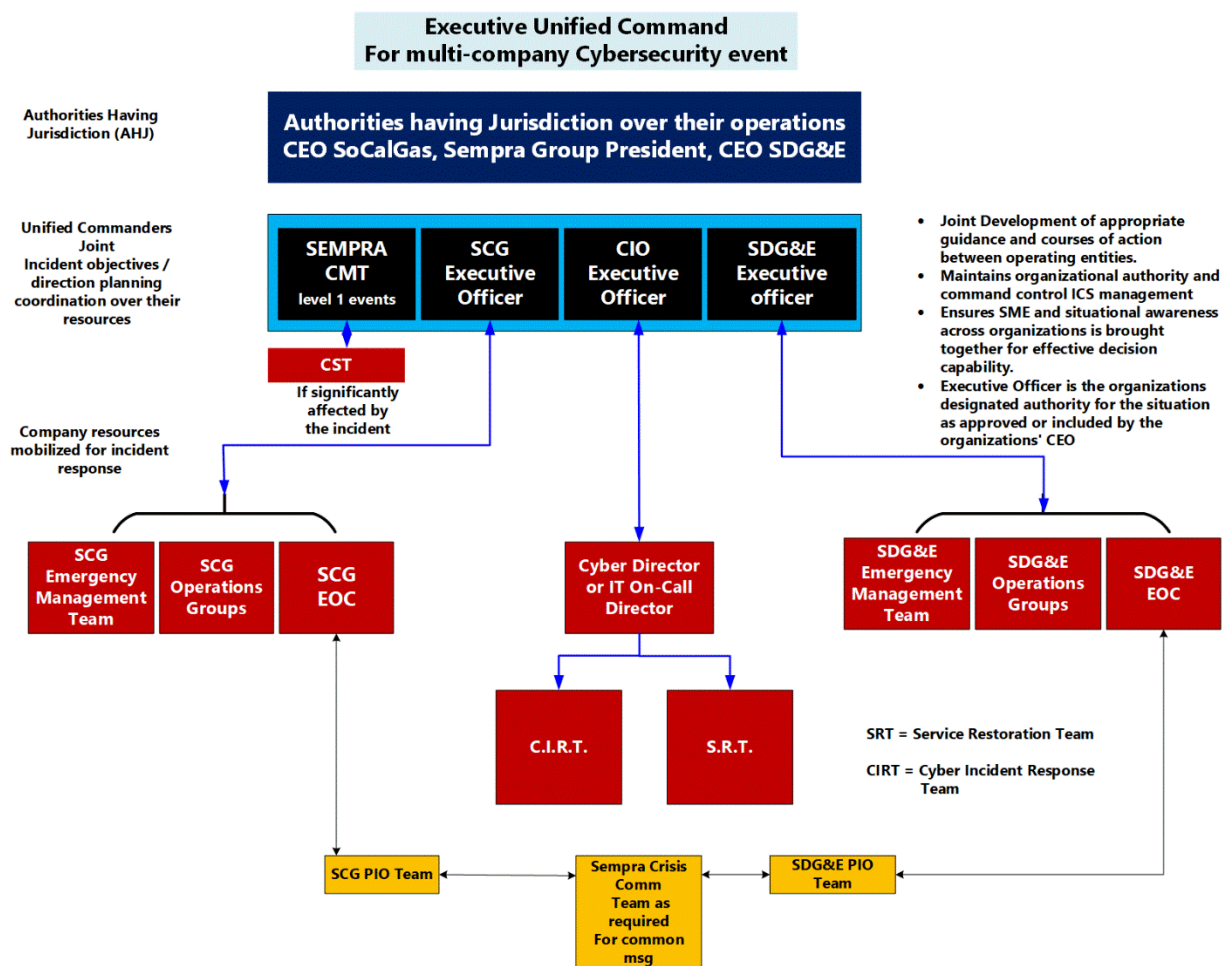
When an emergency is of such magnitude and is affecting all three corporations (SDG&E, SoCalGas, Sempra) such as in an IT-Cybersecurity situation or catastrophic disasters, communications have been established to link our EOC's and executive leadership together. This provides for immediate situational awareness and joint strategic planning to occur simultaneously. This general approach also allows for single voice corporate messaging to avoid media and public confusion over the corporate response. See Figure 13 below. The inclusion of an executive unified command function, as necessary for an IT-Cybersecurity event, is also illustrated in figure 14 to ensure situational awareness to our senior executive leadership and effective response coordination of the companies.

Figure 13: Intercompany Coordination in IT-Cyber Event 1 Voice Messaging



Due to IT-Cyber shared service between affiliates, if an event is of such magnitude that it could affect all companies, a joint virtual EOC briefing will be set up so all parties can maintain situational awareness. Coordination of this briefing will be from the affiliates emergency management teams and through the on call watch / EOD systems.

Figure 14: IT-Cybersecurity Event Unified Command Coordination of Sempra Companies



7.2 External Communications

External communications are driven by both specific event and regulatory requirements. Public communications are coordinated and led by the Marketing and Communication department. They are considered the source for the "one voice" communications which may come from SDG&E to customers, media, and our external partners. Coordination for external communications requires multiple departments and EOC positions from utility operations, these departments which man multiple EOC positions include:

- Customer Success
- Customer Care
- Regional Public Affairs
- EM
- Customer Programs
- Business Services
- Asset Management
- Electric Engineering
- Utility Operations

All must be coordinated to ensure external public stakeholders are properly informed of SDG&E efforts in emergency response.

7.2.1 Agency Listing

- California Energy Commission (CEC) (916) 654-4287
- California Public Utilities Commission (CPUC) 1 800-235-1076 (reporting hotline, leave message)
- CalOES California State Warning Center (CSWC) 916-845-8911
- California Utilities Emergency Association (CUEA) Executive Director (916) 845-8518
- County Office of Emergency Services, San Diego (858)-565-3490
- County of Orange Emergency Operations (714)-628-7050

7.3 Customer Communications – Marketing/Communications, Customer Care Center

The Customer Care Center starts to obtain emergency damage data during the Event Level 3 alert and continues through the completion of the emergency. During Level 2 or 1 events, the Customer Contact Center will dispatch a representative to the Electric Distribution Emergency Operations Desk to coordinate outage data for the Customer Care Center.

SDG&E understands the important role the media plays in helping us communicate with our customers and the community. To ensure the most accurate presentation of information, media comments are limited to designated spokespersons or members of the media relations team. SDG&E has several communications tools to expedite the delivery of emergency information to media and customers. These tools contain both primary normal communications tools and alternate means of communications (see Annex A for details) and include:

- **Emergency Radio Ads:** SDG&E has contacted 24 local radio stations to obtain their turn-around time commitment to place emergency ads, which range from 1 hour to 24 hours depending on the station and day-of-week. Additionally, the stations are prepared to provide news coverage as the situation may merit.
- **Media Advisories:** Media Communications will issue media advisories as appropriate and post situation updates on SDG&E's news center and social media channels that include Twitter, Facebook, and Instagram. Additionally, when appropriate, proactive calls will be made to local print publications, broadcast television and radio stations to provide situation updates.
- **Website outage information:** An outage website, which can be accessed through www.SDGE.com, provides information about active electrical outages. Another relevant emergency information can be accessed through www.SDGEnews.com. The information communities affected contains details such as communities affected, outage cause, number of customers affected and estimated restoration times. Similar information can be found on SDG&E's phone app.

In addition, the Media Communications team monitors the 24-hour media hotline where the media can obtain more information and updated information.

7.4 Reporting Procedures:

7.4.1 During Normal Business Hours:

Notification to EM could come from a Company Utility OIC, Operations, a District Director or their designee, Corporate Communications, the Customer Care Centers or First Responder Agencies.

The on-duty EM employee is responsible for obtaining accurate internal information and then contacting each of the organizational emergency contacts on the agency listing. The on-duty EM employee is responsible for providing follow-up information at a reasonable frequency throughout the event to those agencies on the agency listing. Developing a record from the initial contact and each subsequent contact is necessary.

7.4.2 During Non-Business Hours:

EM has a rotational employee that stands one week on duty shifts. An EM on-duty telephone number, text page, and e-mail provides the notification mechanism for alerting the EM team. The on-duty EM will contact the notifying party within 30-minutes, obtain information and call the Manager of Emergency Operations Services, who will instruct the EM on-call on what notifications and actions to take.

The on-duty EM employee is responsible for obtaining accurate internal information and then contacting the organizational emergency contacts on the agency listing as appropriate. The exception is the CPUC who is contacted by SDG&E's Claims Department when reporting criteria is met. An EM employee is responsible for providing follow-up information at a reasonable frequency throughout the event to the appropriate agencies on the agency listing. Developing a record from the initial contact and each subsequent contact is necessary.

7.5 External Partners

Guidelines have been developed for the EM Department for reporting major electric and gas outage information for purposes of regulatory compliance and supporting proactive communication links. Local and State Agencies or SDG&E may initiate outreach. Using SEMS and familiarity with local agencies organizational structure, SDG&E coordinates emergency response activities with local agencies as the incident requires.

Communication with local emergency management agencies is coordinated through the EM department. These agencies are updated on emergency events and progress of restoration through EOC liaisons and/or EM's Emergency On Duty (EOD) representatives.

7.6 Media Partners

The Media Communications team is responsible for providing timely and accurate information to the news media and employees. Information is disseminated through traditional news outlets, social media outlets and internal communication platforms. SDG&E uses a "one voice" communications strategy for all internal/external stakeholders to ensure consistent messaging.

7.7 Customers Notifications

During emergencies direct customers communications using email, phone and SMS texts are implemented using an enterprise notification system (ENS) which sends approved messages to customers using available contact systems. The Customer Care Center starts to obtain emergency damage data during an event Level 3 activation and continues through the completion of the emergency.

In preparation of PSPS events SDG&E performs advanced customer outreach using the ENS system. For Medical Baseline Customers (MBL) who aren't contact confirmed using the ENS, phone calls are made by Customer Care Center representatives, then for remaining customers not reached via phone, Customer Service Field representatives are dispatched to their door to inform them in-person or they leave notifications on their door to notify them of an upcoming PSPS event.

7.8 Employees

Per SDG&E Natural Disaster or Major Emergency Procedures the following sections detail employee responsibilities and district responsibilities within SDG&E.

7.8.1 Employee and Facility Emergency Action Plans

Every facility within SDG&E must have an Emergency Action Plan (EAP). The primary goal of these EAP's is to ensure the safety of all employees during a workplace emergency. The plans should be followed whenever possible; however, they do not replace the use of common sense by an individual employee.

Each facility EAP has a designated Emergency Response Team (ERT) which is comprised of trained employees who assist the appointed Building Leader in responding to a workplace emergency. The ERT may elect to train employees to be able to render first aid, CPR, AED, or implement firefighting measures. The ERTs members are a Building Leader, Floor Leader(s), Assistant Floor Leader(s), and other employees trained to respond in an emergency, however any employee may be assigned responsibilities during an emergency.

7.8.2 Employee Responsibilities

Employees with specific emergency assignments report to their assigned locations and perform duties as indicated:

- In local instructions, or pre-assigned emergency duties.
- In written emergency instructions not a part of the Formal Communications program.
- If the GEC, EOC or Docs are activated, employees trained as responders may be requested to report to these locations. Employees will be notified through the call out lists created by these entities with information regarding when and where to report. Employees will be notified via cell phone or landline, pager, or text message.

7.8.3 Employee Actions with No Specific Emergency Assignment

On or Off Hours	Employee Actions
During Scheduled Working Hours:	SDG&E CSF and Gas Distribution employees follow instructions of a supervisor, police, or fire personnel, etc. Employees in the field make the job safe and report to their regular operating district, if possible; otherwise, to the nearest functional operating district or headquarters location. Non-field employees should follow instructions of a supervisor, police, or fire personnel, etc.
During Non-Working Hours:	If the disaster has occurred elsewhere and has caused no damage in the vicinity of the employee's location, turn on a radio or television set to receive general instructions. Employees await instructions from the company or call the Employee Emergency Information Hotline number, listed below for further reporting information. Unless otherwise informed, employees report to work at their next regular working time.

7.8.3.1 General Disaster with Significant Damage in Employee District

If the disaster is general, has caused significant damage in the employee's assigned district as determined from observation or radio and television reports, the employee will:

- First, make sure their family is safe.
- Follow emergency procedures and instructions specific to their department, if any.
- Contact their supervisor to report their status, availability to stay at work or come to work, and their contact information.
- Call the Employee Emergency Information Hotline, listed below for periodic updates on the crisis. If phones are down, employees may try their company website and radio or television news for additional information.
- Unless otherwise informed, employees report to work at their next regular working time.
- EM department maintains an Emergency Reporting Instructions (ERI) wallet card which is distributed to all employees. This card outlines the emergency reporting responsibilities of employees, supervisors, managers, and directors.

7.8.4 Major Emergency Employee Information

Employees may call the following number to verify status of company operations following a major emergency.

- SDG&E Human Resources will be responsible for recording emergency incident information messages on the employee hotline (800) 220-3918.

7.9 Communications Equipment Testing

Annex A contains SDG&E's Communications Plan, and addresses the systems and equipment utilized by SDG&E for response and alternative communications which assists in continuity of operations and preparedness. The EOC (primary and alternate) communications systems are tested monthly by the IT department to ensure they are fully operational. In addition to the monthly tests, SDG&E will also conduct a test of the communications systems annually. SDG&E's EOC activates on a regular basis (5 to 10 times annually) for various situations. However, if SDG&E activates the EOC at a Level 2 or higher during the twelve-month period, the activation will be considered as compliance to the yearly test in lieu of a running a separate test.

During EOC activations, the communication systems are used to communicate to company personnel, regulatory, government, and public. Any discrepancies or system failures during tests or activations are documented and repaired. This also meets the regulatory requirements of GO 166 which states: "The utility shall conduct an exercise annually using the procedures set forth in the utility's emergency and disaster preparedness plan. If the utility uses the plan during the twelve-month period in responding to an event or major outage, the utility is not required to conduct an exercise for that period."

8 Administration and Finance

This section describes the administrative protocols including documentation, after-action reporting, cost- recovery, and resource financial management.

8.1 After Action Review Program

SDG&E's After-Action Review (AAR) program involves conducting a comprehensive review with key stakeholders after tabletop exercises, EOC activations, and field incidents, where there are opportunities for continuous quality assurance and quality improvement. Findings and lessons learned from the AAR process are documented, communicated, assessed, and referenced to reduce the risk of reoccurrence. The following actions summarize the AAR programmatic response following an incident:

- Facilitating a comprehensive incident de-brief with key stakeholders, both internal and external, where appropriate.
- Documenting and storing lessons learned and/or findings in a shared and approved repository, made available to employees, as appropriate.
- Assigning findings and/or lessons learned to the responsible department(s), where accountability and timelines are then established.
- Incorporating and or considering lessons learned gleaned from this process in designing and developing EOC-related skills training and exercises.

8.2 EOC Document Management

During EOC activations the Planning Section, as an extension of the EM department, is responsible for coordination of event documentation, including EOC event files.

- The Documentation Unit (Doc Unit) establishes, monitors and managers documents created during an event.
- The Situation Status Unit (Sit Stat Unit) monitors the overall event a makes sure to record decisions made during the event.

Following each event, the Doc Unit Lead coordinates with the Sit Stat Unit to make sure event files are compiled and archived. For reference the timeline of saving documents and communications refer to the table below.

Depending on the event, such as PSPS, there is potential for cost-recoverability. The cost-analysis goes into the rate-case review. In every event, the Finance office assigns a specific Incident Order (IO) code so every accountable people-hour or equipment cost can be assigned to the specific event.

8.2.1 Vital Record Retention:

Sempra Energy Records Management BU Master Schedule June 12, 2019.PDF guides the retention of records for the enterprise. The pertinent records retention policy for disaster and regulatory compliance of the EM operations and plans are:

Table 7 - Record Retention Timeline

Record Type	Retention time in years
CA Utility Regulatory records	Indefinite
CA Utility Regulatory records	Active + 6, active means as long as it is in effect
Government Relations	6
Customer Relations	3
Gov Compliance and Reporting SEC	Indefinite
Gov Compliance and Reporting general	6

Formal Orders and Decisions Regulatory	Indefinite
Business Continuity and Disaster Records	Active +3
Administrative Records	3

8.3 Financial Accounting

The SDG&E Finance and Accounting department lays out company policy for approval and commitment procedures, general ledger entry transactions, and revenue management approval. This department provides guidance on shared assets, services and sundry actives and billing. Finance and Accounting administers and provides training for the Systems, Applications & Products (SAP) system which is the company wide financial accounting tool. This department is ultimately for planning and justifying the budgets for every SDG&E department.

The Finance and Accounting department supports the EOC Administrative / Financial section which is responsible for maintaining the cost impact (claims, damages, resources) of an activated emergency operation within the company. This unit follows all approved financial accounting policies / plans of SDG&E as referenced in the financial plan for the company. These costs are distinguished and made available to Senior leadership for their visibility and decision capability during a disaster.

9 Plan Development and Maintenance

This general plan has been adjusted for changes made since the last submittal and incorporates the requirements of CPUC Decisions D.98-07-097, D.00-05-022, and D.12-01-032 as well as the latest CPUC reporting guidelines of November 1, 2012, CPSD Memorandum. Procedural manuals are updated as required to conform to this general plan.

9.1 Plan Maintenance

The plan will be reviewed annually by the EM department and updated to meet changes in regulatory requirements and recommendations resulting from training, exercises, and After-Action Reports. Every three- years EM will do a full document review and invite stakeholders companywide to provide input. EM update and track the changes annually. The changes will be recorded in the Record of Changes section of this plan.

Following the three year review, the plan will be re-submitted to SDG&E leadership for approval following the SDG&E ['EM Document Approval Maintenance-SDGE-10-2022.pdf'](#) plan.

The plan will then be shared with each department for reference.

9.2 Plan Evaluation

Annual reviews are performed in Q1 of each year. The annual review will be based on outcomes from exercises to testing multi-hazard events as well as actual emergency events. These exercises simulate the need to activate the EOC. The exercises will focus on operational objectives set by leadership. The overall objectives are to improve coordination and communication during an event. Exercises will include drills, workshops, and discussion-based events such as a tabletop exercise. Based on the foundations built in the less complex events, functional exercises will be performed to test all processes and procedures used responding to those events. Annually the scenarios will change dependent on the current hazard environment, regulatory requirements, and leadership intent.

Based on the compiled after-action feedback process from the exercises and real-world events, the review will verify if the current plan still meets regulatory requirements and or operational needs. Updates to the plan will be based on the compiled reports over the three cycles and submitted to leadership for approval and internal distribution.

Annual presentations reviewing our CEADPP are done with our external stakeholders. It allows them an opportunity to provide input and feedback. Their input is recorded and considered for the three-year document review. The plan and its review are done to meet California's Assembly Bill1650.

9.3 Training and Exercise

The EM department is responsible for programing the training and exercises for the EOC responders and the operational departments. SDG&E EM coordinates safe, effective, and risk-based emergency preparedness to prepare for, respond to, and recover from all threats and hazards safely and efficiently. The EM department sustains quality assurance and improvement processes through strategic planning, training, and simulation exercises targeting both EOC responders and operational departments. The training requirements for EOC responders is:

EOC Role Type	Required G Series & SEMS Training	Required ICS Training	Required NIMS Training
All Responders	SEMS G606	IS Intro to ICS IS 200 Basic ICS for Initial Response	IS 700 NIMS
EOC Command & General Staff	SEMS 606 G 611 EOC Section Overview (L,M,O,P,F) G 626E EOC Action Planning G 775 EOC Mgmt & Ops	IS 100 Intro to ICS IS 200 Basic ICS for Initial Response G 191 ICS/EOC Interface	IS 230 Fundamentals of Emergency Management G 197 Integrating AFN into Emergency Management (or IS 368) IS 700 NIMS IS 706 NIMS Intrastate MA IS 800 National Response Framework, an Intro.

Following each exercise and real-life event, a lessons-learned meeting takes place with event responders to generate the After-Action Report (AAR). This report summarizes what worked well and what needs improvement to the plan and is conducted with each active participant. AARs are then presented to leadership with identified action items to assist in determining responsibility, accountability, and completion dates for plan revision. The improvement items are then incorporated into existing procedures, accounted for in the overall SDG&E Emergency Response Plan and appropriate resulting training. Action items requiring incorporation to the CEADPP will be part of the annual review in Q1.

10 Authorities and References

Authorities for compliance rest with the California Public Utility Commission ([CPUC](#)) and the Federal Energy Regulatory Commission ([FERC](#)).

The CPUC regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies, in addition to authorizing video franchises. The CPUC's five Governor- appointed Commissioners, as well as our staff, are dedicated to ensuring that consumers have safe, reliable utility service at reasonable rates, protecting against fraud, and promoting the health of California's economy.

The Federal Energy Regulatory Commission, or FERC, is an independent agency that regulates the interstate transmission of natural gas, oil, and electricity. FERC also regulates natural gas and hydropower projects.

Online Resources	• SDG&E Weather Awareness System: http://www.sdgeweather.com/ • NWS San Diego: http://forecast.weather.gov/MapClick.php?lat=32.80437037169639&lon=-117.13430639012711#.WByySvkrLRY • Santa Ana Wildfire Threat Index: https://fsapps.nwcg.gov/psp/sawti • NOAA Storm Prediction Center's Fire Weather Forecast: https://www.spc.noaa.gov/misc/about.html#FireWx • CALOES PSPS_Standard_Operating_Guide_5.17.2022.pdf
Public Utility Code	• California Public Utility Commission: General Order 166 – Standards for Operation, Reliability and Safety During Emergencies and Disasters • NERC Reliability Standards: COM – 001 – 3, EOP-004-4, 005 -3, 006-3,008-2,010-1,011-1
Corporate and Company Policy or Charter	• Corporate EOP-Sempra-9-2022.pdf • ER-1SD-SDGE-5-2023.pdf • Electric Emergency Load Curtailment (ELC-Redbook) PlanCONFIDENTIAL-SDGE-2023.pdf • SDG&E Fire Preparedness Transmission Restrictions TMC1320a • Crisis Communication Plan-SDGE-2020.pdf • EOC Communications Failover Plan-SDGE-11-2022.pdf

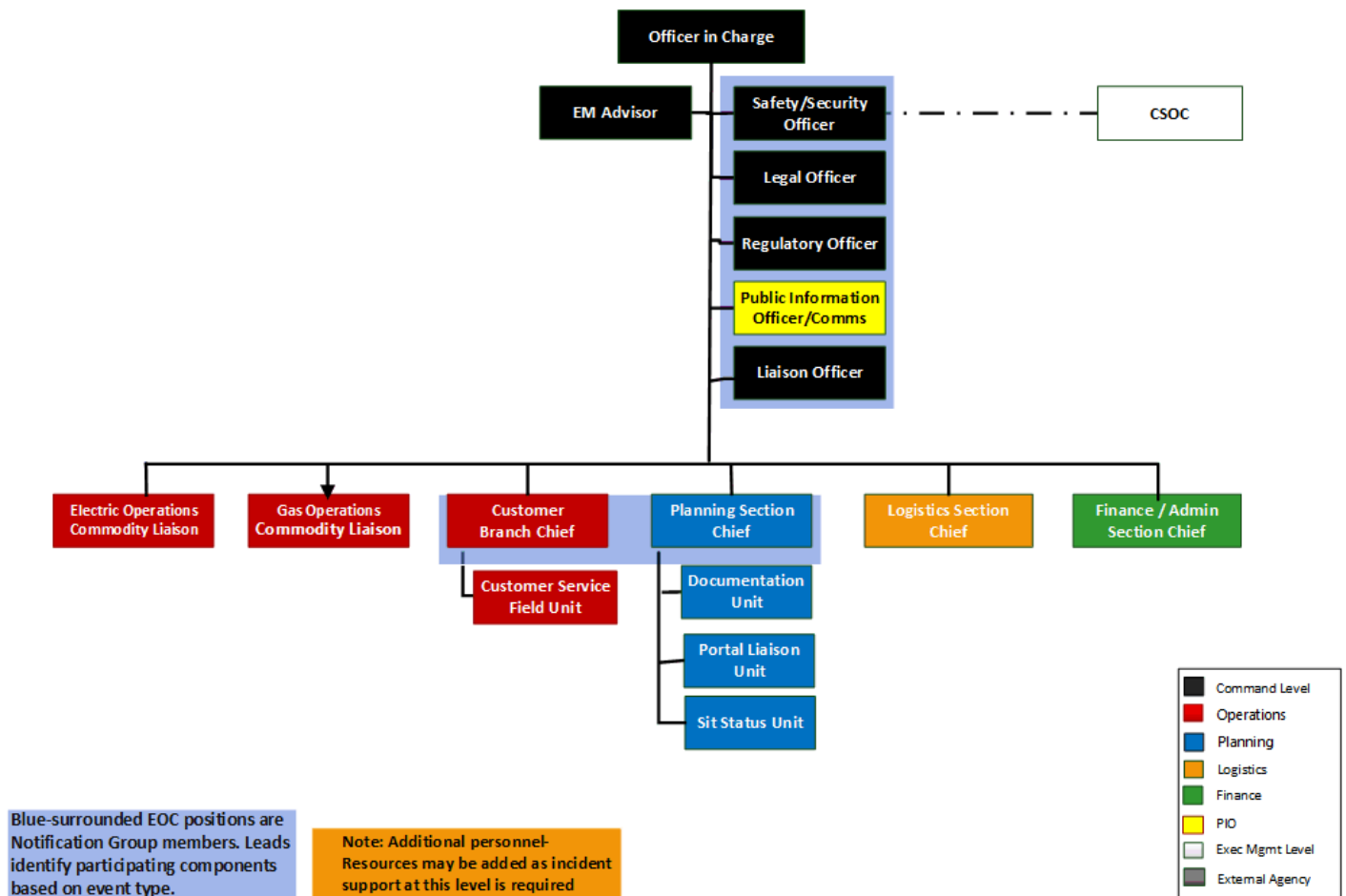
11 List of Appendices

Title:
EOC Levels of Emergency
Matrix of Responsibilities
Acronyms and Definitions
Virtual EOC Executive Summary

Appendix A EOC Levels of Emergency

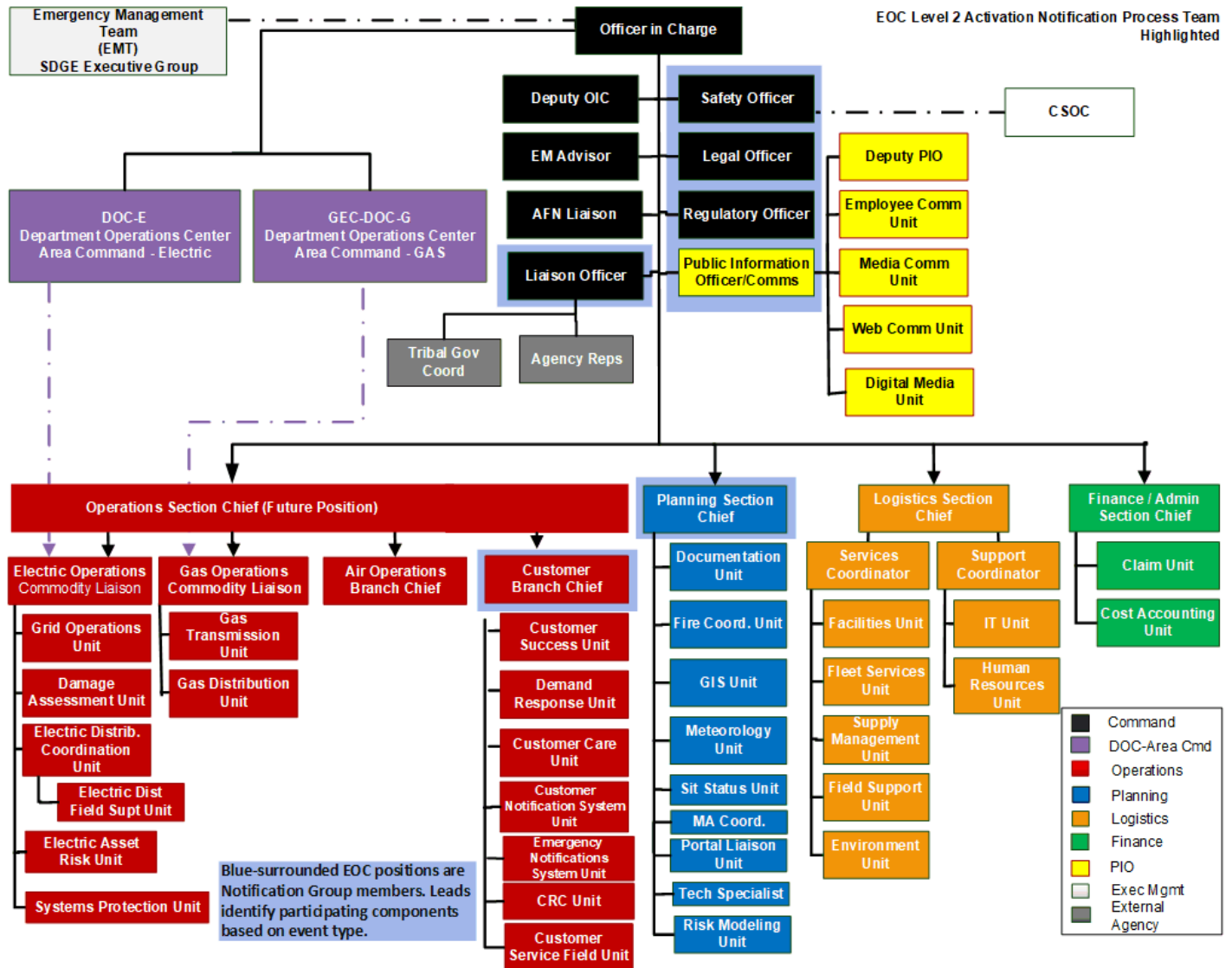
Figure 15: EOC Level 3 Activation with Notification Team Highlighted

EOC Level 3 Activation with Notification Process Team Highlighted



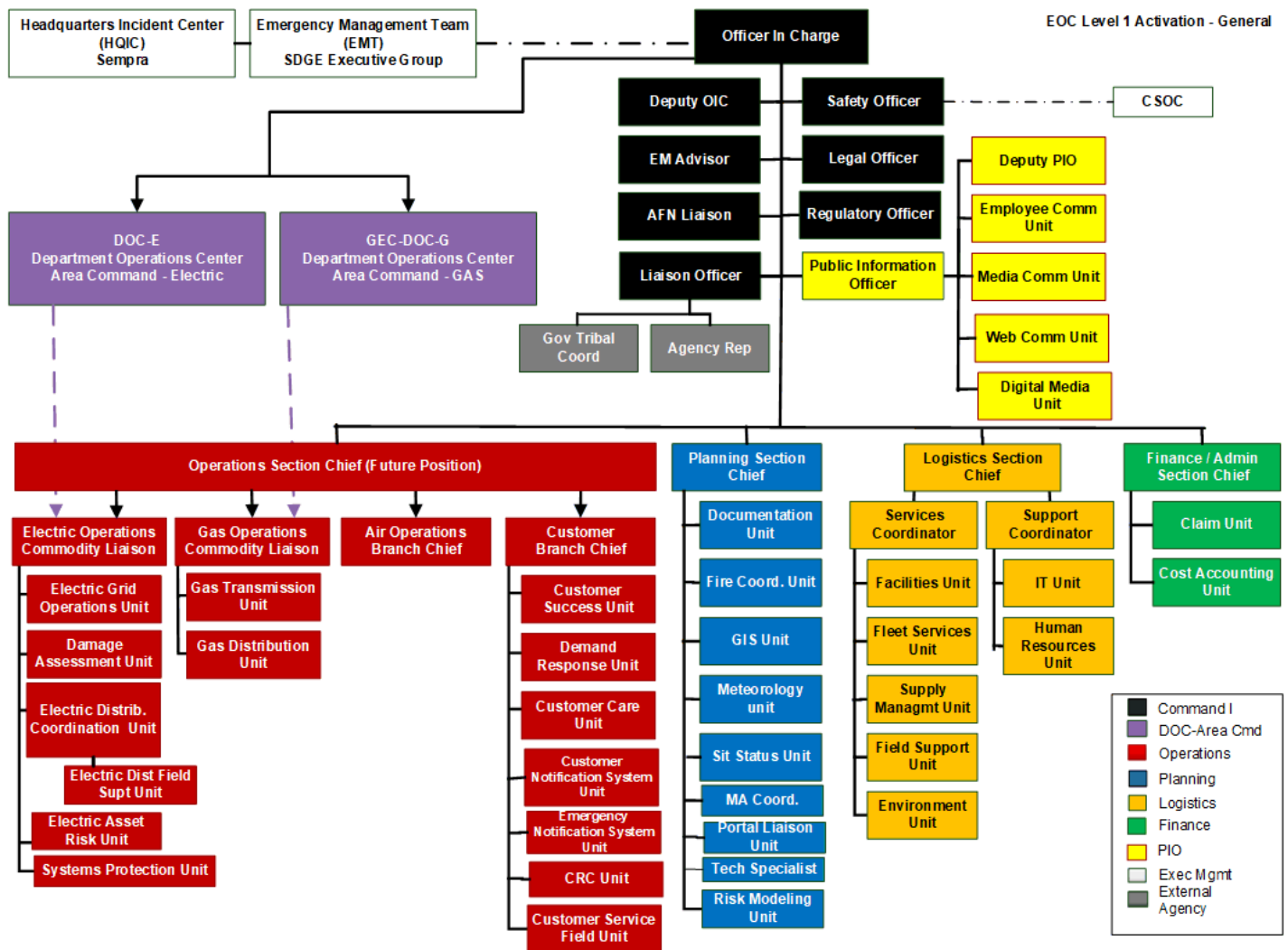
- This EOC minimum configuration is used in a situation involving external regulatory notification requirements, public, government or media involvement.
- Notifications is an intensive operation, and the team components identified in this figure illustrate this process.

Figure 16: EOC Level 2 Activation with Notification Team Highlighted



EOC Level 2 functional diagram for coordination of support requests from the field and internal and internal notification.

Figure 17: EOC Level 1 Activation Illustrating the Inclusion of Sempra HQIC Functions.



Appendix B Matrix of Responsibilities

Matrix of [EOC Workforce Roles Responsibilities-SDGE-9-2021.pdf](#)

Appendix C Acronyms and Definitions

Acronym	Definition
AAR	After Actions Report
AC	Area Command
AFN	Access and Functional Needs
AOR	Area of Responsibility
BCP	Business Continuity Plans
C&O	SDG&E Construction and Operations Centers, also called Districts
Cal OES	California Office of Emergency Services
CEADPP	Corporate Emergency and Disaster Preparedness Plan
CIRT	Cyber Incident Response Team
ConOps	Concept of Operations
CPG	Federal Emergency Management Agency's Comprehensive Preparedness Guide
CPUC	California Public Utilities Commission
CRC	Community Resource Centers
CS	Customer Success
CSF	Customer Service Field
DCC	SDG&E's Distribution Control Center, distribution control only
DHS	Department of Homeland Security
DOC	Department Operations Center
DOC-E	Department Operations Center - Electric
DOC-G	Department Operations Center - Gas
EAP	Emergency Action Plan
EDO	SDG&E Electric Distribution Operations Department
EEI	Essential Elements of Information

EGO	SDG&E Electric Grid Operations Department
EMT	Executive Management Team
ENS	Emergency Notification System
EOC	Emergency Operations Center
EOD	Emergency on Duty
EOP	Emergency Operations Plans
ERO	SDG&E Electric Regional Operations Department
ETR	Estimated time of restoration
ETS	SDG&E Electric Troubleshooter
FERC	Federal Energy Regulatory Commission
FPI	Fire Protection Index
FSCA	Fire Science and Climate Adaptation
GCC	SDG&E's Transmission Grid Control Center, transmission control only
GEC	SDG&E Gas Emergency Center
GIS	Geographic Information System
HFTD	High Fire Threat Districts
HQIC	Sempra Headquarters Incident Center
IC	Incident Commander: The person, Fire / Law Enforcement first responder, who has the overall responsibility for all aspects of the incident. They are responsible for the operational mitigation of the incident, the logistical support needs, any financial issues involved, safety of incident personnel, public information, and planning functions for extended incidents. They can and should delegate authority for performing certain activities to other qualified personnel as the incident grows.
ICP	Incident Command Post: The primary place the IC and other key incident personnel will be located. It should be accessible, located near or adjacent to the incident, but not necessarily within the incident, and large enough to accommodate the associated activity.
ICS	Incident Command System: Basic principles of ICS include establishing positive command and control of the incident by identifying an IC or group of Unified Commanders in a multiple jurisdiction incident, identifying an ICP for single point of contact, and establishing a central ordering point for all additional resources and/or supplies. Emphasis in ICS is on managing span of control for supervision of incident personnel and providing a platform for inter-functional and interagency cooperation.

SOC	Information Security Operations Center
IST	Incident Support Team: SDG&E Emergency Operations Center responders is led by the Utility Officer-in-Charge.
LEPC	<i>Local Emergency Planning Committees</i>
MIMT	Cyber–Major Incident Management team
Major Incident	Emergency incidents that result in major damage, that are unusually complex, and/or require multiple crews to respond and are declared as such by the first responder, on-duty supervisor, or other company official in the proper chain of authority.
MMI	Modified Mercalli Index
NG	Natural Gas
NIMS	National Incident Management System
NOC	Network Operations Center
NRF	National Response Framework
NWS	National Weather Service
OA	Operational Area
OES	Office of Emergency Services
OIC	Designated utility Officer in Charge: leadership with authority over all support functions
OSS	SDG&E Grid Control Operations Shift Supervisor
PII	Personal Identifiable Information
PIO	Public Information Officer
POC	Point of Contact
PPE	Personal Protective Equipment
PSPS	Planned Safety Power Shutoff
RFW	Red Flag Warning
SAWTI	Santa Ana Wildfire Threat Index
SCM	Substation Construction and Maintenance Section of SDG&E's Kearny Maintenance and Operations Department

SDC	San Diego County
SEMS	California State Emergency Management System
SME	Subject Matter Expert

SONGS	San Onofre Nuclear Generating Station
SOP	SDG&E Standard Operating Procedure
SORT	Service Order Routing Technology
SPM	System Protection Maintenance Section of SDG&E's Kearny Maintenance and Operations Department
TCM	Transmission Construction and Maintenance Section of SDG&E's Kearny Maintenance and Operations Department
TST	SDG&E Electric Distribution Operations Technical Support Team
UC	Unified Command: When multiple jurisdictions are involved, a Unified Command can be formed to manage the incident. Each respective agency can have an IC within the Unified Command. It is critical that members of the Unified Command be co-located and that the Unified Command speaks with one voice in overall incident management. Generally, the agency with the greatest responsibility for the incident will serve as the primary IC.
UFC	Utility Field Commander
WF-4	Working Foreman 4-man crew
VRI	Vegetation Risk Index

Appendix D Virtual EOC Executive Summary

By direction of the OIC or EM Director, instead of standing up the physical EOC, SDG&E has the capability using Microsoft TEAMS, to stand up a virtual EOC with all the functioning components of the physical EOC. Video conferencing, file sharing, notifications etc. functions within the physical EOC are carried out remotely from the facility. This is summarized in the [Virtual EOC Model Executive Summary-SDGE-12-2020.pdf](#)

Appendix E Plan Updates

[CEADPP- Revisions 3-2024.pdf](#)

12 Functional Annexes

Annexes are documents which will be updated as required to meet operational response needs and may not meet the three-year cycle update process prescribed for the overall Company Emergency Response Plan (CEADPP). These documents can be referenced and pulled into the CEADPP for guidance when the functional or hazard specific event requires. They are considered separate but connected documents.

Annex A Crisis and Emergency Communications Tools and Plans

The Crisis Communications Plan focuses on communications with external partners and the public. It is intended to coordinate internal resources and the Notification Group to ensure the "one voice" communication tone is consistent between all external stakeholders, customers, elected leaders, regulatory, and public safety partners. This plan is managed by the Marketing and Communication department.

SDG&E has three support plans to assist leadership and EM staff as to the resource capabilities, normal and alternate communication systems, and utilization procedures.

- [EOC Communications Failover Plan-SDGE-11-2022.pdf](#)
- [Exec COL Plan-SDGE-5 2022.pdf](#)
- [Satellite Phone Emergency Comms-SDGE-6-2021.pdf](#)
- [Crisis Communication Plan-SDGE-2020.pdf](#)

Annex B Mutual Assistance Plan

The Electric Distribution, Electric Emergency Operations Desk Manager, GEC, or Emergency Operations Center Company Utility Commander will do the following:

- Notify Emergency Operations Services that mutual assistance is being considered and request that informal inquiries to other utilities be made.
- Determine resource needs from discussions with the districts, the outage forecast data, the storm forecast and resource shortages.
- Hold discussions with the Vice President of Electric System Operations, the Senior Vice President of Electric Operations, the Directors of Electric Operations, the Director of Design and Construction Management, the Manager of Emergency Operation Services, and the Director of EM on the need for mutual assistance and obtain approval to request.

Conditions triggering these discussions include, but are not limited to the following:

- Nearing ten percent of SDG&E's electric customers being out of service at any one time.
- When forecasted restoration time exceeds 24-hours, discussion for mutual assistance is initiated and decisions are documented.
- Storm Impact intensity is forecasted to last another 48-hours.
- All SDG&E crew resources have been or will be committed.
- All local contract crews have been or will be committed.

SDG&E has four Mutual Assistance Agreements with:

- California Utility Emergency Agency (CUEA)
- Edison Electric Institute (EEI)
- American Gas Association (AGA)
- Western Regional Mutual Assistance Group (WRMAG)

Annex C Gas Emergency Response Plan

This emergency response plan, along with referenced documents and procedures, outlines how San Diego Gas and Electric prepares for, responds to, and recovers from gas related emergencies. This plan incorporates and complies with the emergency response requirements found in Public Utilities Code 961 (b), (c), and (d)(1-10) as well as the emergency response procedures required by 49 CFR 192.615.

- [ER-1SD-SDGE-5-2023.pdf](#)

Annex D Electric Emergency Operations Plan

The Electric Grid Operations EOP provides an overview of the subset of documents that constitute SDG&E's EGO EOP to operate and maintain a reliable transmission system during emergency and critical conditions.

- [EOP1000 EGO.pdf](#)
- [TMC1310 ICS Electric Transmission Monitoring and control.pdf](#)
- [TMC1320a EFF-2021-1013.pdf](#)
- [TMC1004 EFF-2021-1013.pdf](#)
- [SDG&E 2023 Electric Emergency Load Curtailment \(ELC\) Plan CONFIDENTIAL.pdf](#)

Annex E Continuity of Leadership

- [Exec COL Plan-SDGE-5 2022.pdf](#)

Annex F Hazards, Threats, or Incident Specific Annexes

The hazard specific annexes are updated as required to meet both operational and regulatory requirements to assist executive leadership in their response coordination. These documents are also considered separate but connected documents which are designed to complement the CEADPP.

Annex G Earthquake

The earthquake annex includes information from the following references:

- [Earthquake Annex Plan-SDGE-6-2023.pdf](#)
- [EOP1000 EGO Emergency Operating Procedures-SDGE-10-2020.pdf](#)
- [SoCalCatastrophicEQPlan-FOUO-CalOES-\(psw-femar09\)-10-2022.pdf](#)
- [Gas Safety Plan-SDGE-3-2023.pdf](#)

Annex H Public Safety Power Shutoff

The Wind Event Annex includes information from the following references:

- [Wind Event PSPS ConOps-SDGE-4-2023.pdf](#)
- [PSPS Standard Operating Guide-CalOES-5-2022.pdf](#)

Annex I Cyber/IT Event

The Cyber Annex includes the information from the following references:

- [IRF1100 Cyber Security Incident Response Procedure-SDGE-6-2017.pdf](#)
- [EM-Cyber-IT ConOps-SDGE-5-2021.pdf](#)
- [Exec-EM-IT Cyber-Coord Plan-Sempra-SoCalGas-SDGE 08-2023 Confidential.pdf](#)

Annex J Wildfire Event

- [WMP with attachments-SDGE-2023-2025.pdf](#)
- [Wildfire Annex-SDGE-3-2023.pdf](#)

Annex K Pandemic Event

The Pandemic Annex the information from the following references:

- [Pandemic Plan-SDGE-5-2020.pdf](#)