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VIA E-MAIL

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

**RE: SDG&E's Quarterly Notification Pursuant to Public Utilities Code section 8389(e)(7)**

**Docket #2025-SCs**

Dear Director Thomas Jacobs:

Pursuant to Public Utilities Code Section 8389(e)(7) and the April 2025 Office of Energy Infrastructure Safety's (Energy Safety) Safety Certification Guidelines,<sup>1</sup> San Diego Gas & Electric Company (SDG&E or the Company) hereby submits to the Office of Energy Infrastructure Safety (Energy Safety) this notification detailing the implementation of (1) SDG&E's approved Wildfire Mitigation Plan (WMP), (2) implementation of the recommendations of the Company's most recent safety culture assessment, (3) a statement of the recommendations of the Board of Directors Safety Committee (Safety Committee) meetings that occurred during the quarter, and (4) a summary of the implementation of prior Safety Committee recommendations.

## **I. BACKGROUND**

Governor Newsom signed Assembly Bill (AB) 1054 into law on July 12, 2019. AB 1054 contains numerous statutory provisions and amendments designed to enhance the mitigation and prevention of utility-related catastrophic wildfires in California and promote utility financial stability, including the creation of the safety certification process. Public Utilities Code Section 8389(e) established the requirements the electrical corporations to receive an annual safety certification,<sup>2</sup> which, among other things, include an approved WMP and implementation of the initiatives therein, the establishment of a safety committee of the electrical corporation's board of directors, board-of-director-level reporting to the Commission on electrical system safety, and the

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<sup>1</sup> Energy Safety's Safety Certification Guidelines provides guidance on the contents, format, and timing of the compliance reporting Energy Safety requires of the electrical corporations.

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

submission of quarterly reports notifying Energy Safety and the Commission regarding WMP implementation and compliance with other AB 1054 requirements.

Specifically, Public Utilities Code Section 8389(e)(7) requires electrical corporations to file a notice of implementation of its approved Wildfire Mitigation Plan with Energy Safety “on a quarterly basis that details the implementation of both its approved wildfire mitigation plan and recommendations of the most recent safety culture assessment, and a statement of recommendations of the board of directors safety committee meetings that occurred during the quarter.” Section 8389(e)(7) also requires that the notification “summarize the implementation of safety committee recommendations from the electrical corporation’s previous notification and submission.” SDG&E’s Quarterly Notification for the first quarter of 2025 is contained herein.

## **II. DISCUSSION**

### **1) Quarterly Information-Only Submittal to the CPUC**

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

### **2) Quarterly Progress Report on WMP Implementation**

SDG&E tracks 42 quantitative initiatives established in its 2023-2025 Wildfire Mitigation Plan. SDG&E’s WMP initiatives are designed to mitigate the risk of wildfire due to a fault on the electric system and reduce the impacts of PSPS to customers. These mitigations are categorized across three categories within the WMP including Grid Design, Operations and Maintenance, Vegetation Management and Inspections, and Situational Awareness and Forecasting.

SDG&E’s primary system hardening initiatives, namely the installation of covered conductor and strategic undergrounding of electric distribution infrastructure, achieve risk reduction by reducing the likelihood of an ignition. SDG&E utilizes and continues to enhance its risk modeling to inform decision making for mitigation selection and prioritization and during emergency response or PSPS events.

SDG&E also employs mitigations intended to reduce the impact of wildfire in the event of an ignition, including high-definition cameras, ground and aerial fire suppression resources, and a fuels management program. Additionally, SDG&E has implemented measures to mitigate the customer impacts associated with PSPS events, including the installation of remote sectionalizing switches to limit the number of customers exposed to PSPS, the establishment of community

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<sup>3</sup> Public Utilities Code Section 8389(e)(7).

resource centers to support customers during PSPS events, and SDG&E's customer outreach programs to promote both wildfire and PSPS preparedness.

A detailed update on SDG&E's WMP initiative progress for the second quarter of 2025 is included in Attachment A. SDG&E's ability to implement its approved 2025 WMP is deeply impacted by its 2024 General Rate Case Decision (GRC Decision), which authorized significant cuts to annual initiative targets and expenditures. SDG&E submitted a Petition to Amend its 2025 WMP to Energy Safety on April 10, 2025 requesting to reduce eleven program targets and increase one program target. The requested changes are presented below for reference. On July 11, 2025, Energy Safety approved six of the twelve requested changes for the 2025 WMP, including Strategic Undergrounding (WMP .473), Covered Conductor (WMP .455), Strategic Pole Replacement (WMP .1189), Transmission Overhead Hardening (WMP .543), Distribution Communications Reliability Improvements (WMP .549) and Lightning Arrester Removal/Replacement (WMP .550). Six program change requests were denied including Drone Assessments (WMP .552), Connectors, including hotline clamps (WMP .464), Avian Protection (WMP .972), Expulsion Fuse Replacement (WMP .459), Detailed Vegetation Inspections (WMP .494), and Pole Clearing (WMP .512). SDG&E is currently evaluating the Petition to Amend Decision to determine its impact on program implementation.

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

As of June 30, 2025, SDG&E has fire hardened 29.62 miles of its electric system, including 20.59 miles of undergrounding and 8.92 miles of covered conductor. SDG&E is on track to complete its required transmission and distribution inspections and its vegetation management activities. SDG&E is also continuing to implement its advanced protection initiatives including Early Fault Detection and initiatives that lessen the impacts of PSPS such as PSPS Sectionalizing. More information on initiative progress and outcome metrics is provided in SDG&E's Quarterly Data Report, also filed August 1, 2025.

### **3) Quarterly Progress Report on Implementing Safety Culture Assessment Recommendations**

Pursuant to Public Utilities Code Section 8389(d)(4), Energy Safety issued its 2022 Safety Culture Assessment Report for SDG&E on May 8, 2023 (2022 SCA Report) and its 2023 Safety Culture Assessment Report on March 22, 2024 (2023 SCA Report). Each report details the assessment carried out by the National Safety Council (NSC), who worked to assess the safety culture of SDG&E through management self-assessment as well as workplace surveys and interviews. In both the 2022 and 2023 SCA Reports, the NSC generally concludes that SDG&E has exhibited continued commitment to advancing its safety culture maturity.”<sup>4</sup>

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

- SDG&E should continue to develop and implement actions to reduce barriers to prioritizing safety over job task goals. Leadership should consistently demonstrate to workers that safety is the top priority through communication, decision making, and taking action, especially when there is a short deadline or pressures to re-energize to reduce the customer impact of outages.
- SDG&E should continue to recognize and mitigate the risk exposure posed by interactions with the public. Frontline workers feel supported in walking away from jobs where interactions with the public pose threats to the crew, but the risk remains a significant concern for SDG&E workers.
- SDG&E should continue to build on its efforts to track trends in safety event-related reporting, specifically tracking the quality of near-miss investigations and addressing gaps in its Ignition Management Program.

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

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

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<sup>4</sup> 2022 SCA Report at p. 3; 2023 SCA Report at p. 3.

On June 15, 2023, SDG&E agreed to implement all of the findings and recommendations from its 2022 SCA Report.<sup>5</sup> On April 5, 2024, SDG&E agreed to implement all of the findings and recommendations from its 2023 SCA Report.<sup>6</sup> As stated in SDG&E's Request for a 2023 Safety Certification<sup>7</sup>, SDG&E "is continually working to promote innovation and enhancement in its safety culture."<sup>8</sup> To highlight its efforts to implement the recommendations of its most recent safety culture assessment, SDG&E continues perform activities to implement the 2021, 2022 and 2023 safety culture assessment reports<sup>9</sup> through various methods, including but not limited to the following:

- Leadership site visits and listening sessions.
- Monthly Electric Safety Subcommittee meetings where employees can raise and discuss safety topics that are documented and tracked through resolution.
- Operational managers and supervisors communicating and educating workers on the safe behaviors associated with mitigating hazards from wildfires and hostile interactions with discontented members of the public.
- Updating SDG&E's safety observation checklists to identify safe and at-risk behaviors associated with mitigating hazards from wildfires.
- Safety advisors hosting meetings with groups who are likely to have interaction with members of the public and providing public safety training refreshers.
- Expansion of SDG&E's near miss reporting application to capture wildfire-related risks and risks posed by discontented members of the public.
- Hosting company-wide town hall events and manager training workshops to educate and promote a culture of safety and trust.
- Chief Safety Officer performing on-site safety visits (rotating district locations) with direct employee engagement, and monitoring interactions and feedback.
- District leadership (Directors, Managers) performing on-site safety visits (rotating district locations) with direct employee engagement; tracking interactions and feedback.
- District leaders holding safety all-hands meetings to clarify and set safety expectations to advance the safety culture.
- Executive Safety Council (ESC) soliciting feedback from front-line operational employees and supervision on safety culture.

Additionally, SDG&E reports the following activities performed during Q2 2025 to implement its 2022 and 2023 Safety Culture Assessment Report recommendations. SDG&E is

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

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

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

<sup>8</sup> *Id.* at 10.

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

reporting on implementation of both its 2022 and 2023 Safety Culture Assessment Report Recommendations:<sup>10</sup>

### Implementation of Recommendation 1

- On April 10, 2025, SDG&E hosted its second contractor quarterly safety summit of 2025. Key objectives of this event include sharing safety best practices, lessons learned and aligning the culture of safety between SDG&E and its contractor workforce
- SDG&E held its Q2 Executive Safety Council Meeting on June 19, 2025. Comprised of cross-functional leadership, the Council met at SDG&E's Metro C&O district to hear directly from employees on their safety experiences to identify opportunities for continued safety improvement by supporting safety initiatives, dedicating resources, and removing barriers to continually advance as a learning organization and reinforce SDG&E's culture of safety.
- On June 7, SDG&E hosted its 22<sup>nd</sup> Annual Gas and Electric Rodeo, an event to celebrate the commitment, skill and comradery of our valued workforce.
- On June 26, SDG&E held a company-wide Town Hall event where SDG&E's executive leadership shared business updates, including customer experience enhancements, reaffirmed the company's unwavering commitment to safety, and solicited questions from employees attending in-person and on-line.
- SDG&E's Chief Safety Officer and other executives continued issuance of weekly employee-wide communications highlighting weekly safety performance, recognizing instances of stopped work and submissions of near miss reports, lessons learned, key safety reminders, and reenforcing leadership's commitment to safety.

### Implementation of Recommendation 2

- In Q2 2025, SDG&E kicked off its annual Wildfire Safety Fairs. For the seventh consecutive year, SDG&E's Fire Science & Climate Adaptation team is hosting Wildfire Safety Fairs (from June through August) to share important information about Public Safety Power Shutoffs, Community Resource Centers, fuels reductions, and other program enhancements available to our communities.
- During Q2 2025, SDG&E continued to deploy improvements to its energization process to help simplify the customer journey by making it easier to find information, understand next steps, and track progress. Through these changes, SDG&E's goal is to improve customer satisfaction and enable customers, both residential and commercial, to start using their electrical services with minimal delays. This effort will help improve public and employee safety by aiming to reduce the frequency of customers circumventing SDG&E procedures and altering equipment prior to SDG&E's onsite visit.

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

- During Q2 2025, SDG&E continued to advance its Advance Customer Notification efforts. These notifications inform customers of work scheduled to be performed in their area and include a link to a website that describes the type of work as well as a video showing customers what to expect. These courtesy text and email messages were successfully deployed as an initial pilot program on October 1, 2024 to enhance customer experience and employee safety in the field.
- SDG&E leadership continues to emphasize the importance of “Stop the Job” whenever an unsafe condition is perceived. Instances of stopped work are recognized during Safety Committee meetings and weekly Near Miss Summary Reports sent to all employees, where applicable.
- SDG&E continues to advance deployment of its Geocall Electric Pre-Construction Mobile Fielding Application launched in Q4 2022. The Geocall application is a leading-edge technology solution used to coordinate and optimize end-to-end field service processes, activities, and resources. The application is used by SDG&E’s Electric Regional Operations Construction Supervisors and back-office team members to digitally capture job requirements, including identification of potential safety concerns during pre-construction field work. The application integrates with GIS maps to include customer warning notifications (e.g., aggressive dogs, access codes, hostile persons) and includes opportunity for crews to include prerequisite and post completion notes.

### Implementation of Recommendation 3

- During Q2 2025, SDG&E employees submitted 107 Near Miss Reports. Of those, over 57% were submitted non-anonymously. SDG&E deployed enhancements to its Near Miss dashboard to provide greater data insights into anonymous vs. non-anonymous submissions to help identify opportunities for improvement.
- During Q2 2025, SDG&E continued issuance of a Weekly Near Miss Summary Report. This Report is sent to all SDG&E employees via e-mail on a weekly basis and provides high level data analysis to identify trends, including tracking on non-anonymous submittals, highlights follow-up action items, resulting safety improvements, safety reminders, key teachings, and recognizes instances of stopped work.
- The Ignition Management Program continues to utilize the evidence of heat report to capture data for OEIS 29300 (Cal. Code Regs. tit. 14 § 29300) and CPUC ignition reports. For improved situational awareness, Fire Coordination receives notification from Service Dispatch on all SDG&E resource requests related to a response of emergency services for a possible fire and follows up on all reports to determine the status of the incident. Processes are continuously reviewed regarding the efficiency of reporting incidents that meet regulatory requirements and documentation of potential fire ignitions. The Evidence of Heat and Ignition data informs wildfire risk analysis. In 2024/2025, SDG&E performed a review of the Ignition Management Program. This included feedback from subject matter experts and areas of other expertise to ensure an independent and diverse pool of opinions were considered in furtherance of continued improvement. In 2025, SDG&E reviewed the outcomes of that review process and implemented recommendations to promote additional

efficiencies and opportunities to improve reporting processes. As of July 2025 all of the recommendations for improvements have been implemented.

Implementation of Recommendation 4 (2023 SCA Report only)

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

**4) Board of Directors Safety Committee Meetings and Recommendations**

The SDG&E Board Safety Committee<sup>11</sup> advises and assists the SDG&E Board of Directors in the oversight of safely providing electric and natural gas services to the Company's customers. The Safety Committee met on July 31, 2025. During the meeting, Kevin Geraghty, Chief Operating Officer and Chief Safety Officer for SDG&E, provided an update on safety metrics and the company's safety performance to date. Brian D'Agostino, SDG&E Vice President for Wildfire Mitigation and Climate Science, provided an update on the upcoming 2025 wildfire season. Mr. D'Agostino noted that a very dry spring in 2025 has left most of SDG&E's service territory in severe or extreme drought conditions going into the fall. Ben Gordon, SDG&E Senior Vice President, Chief Information Officer, and Chief Digital Officer, provided an update on cybersecurity risks and mitigation strategies. Mr. Gordon discussed worldwide cybersecurity trends, including an increased number of cyber attacks on a global scale. John Jenkins, SDG&E Vice President of Electric Operations, and Sneha Parmar, SDG&E Director for Regional Electric Operations, presented on the Sample Aviation Incident that impacted SDG&E's electric facilities and the After-Action Report performed in response. Ms. Parmar highlighted the extreme complexity of the incident response and use of novel technology, such as drones, to perform damage assessment and repair of SDG&E's facilities, and discussed the company's commitment to safety during the incident response, which included safety briefings and tailgates multiple times throughout the day. Dana Golan, SDG&E Chief Customer Officer, presented on updates to SDG&E's field visits and work notifications to customers. Ms. Golan highlighted that increased communications in advance of field visits can improve the customer experience and enhance employee safety.

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

#### 4.1) Recommendations from the Most Recent Quarter

During the July 31, 2025 Board Safety Committee meeting, Rob Borthwick, Board Safety Committee Chair, recommended that, at an upcoming Safety Committee meeting, SDG&E report on the following:

- SDG&E present on prevention of injuries related to falling from heights, and lessons learned from any previous fall-related events;
- SDG&E present on risks associated with out-of-service transmission lines in the High Fire Threat District (HFTD).

#### 4.2) Progress on Previous Recommendations

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

Meeting Date	Recommendation	Status
February 28, 2024	Report on the Company's efforts to prepare for extreme weather events, including flooding and tropical storms, as well as lessons learned from prior events	Completed October 17, 2024
February 28, 2024	Conduct a site visit to a wildfire hardening location	Completed April 16, 2024
April 23, 2024	Report on potential safety hazards associated with battery energy storage systems, and SDG&E's efforts to mitigate battery safety risks	Completed July 25, 2024
July 25, 2024	Report on potential safety hazards associated with pole failures, SDG&E's efforts to mitigate pole failure risks, and pole replacement safety	Completed October 17, 2024
October 17, 2024	Report on contractor safety performance and contractor safety performance accountability	Pending
February 26, 2025	Review SDG&E's late 2024 and January 2025 PSPS events and mutual aid efforts in response to the LA Fires, and report on any lessons learned	Completed May 22, 2025
February 26, 2025	Provide an update on SDG&E's customer communications and notifications regarding field visits and routine work notifications	Completed July 31, 2025
May 22, 2025	Provide an update on the upcoming CPUC Safety Culture Assessment Rulemaking and SDG&E's upcoming Safety Culture Assessment	Pending
July 31, 2025	Present on prevention of injuries related to falling from heights, and lessons learned from any previous fall-related events	Pending
July 31, 2025	Present on risks associated with out-of-service transmission lines in the High Fire Threat District (HFTD)	Pending

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

### **5) Update on SDG&E'S Wildfire Safety Community Advisory Council Meetings**

Per the requirement established in D.20-05-051 that SDG&E report on advisory council activities on a quarterly basis, SDG&E's Wildfire Safety Community Advisory Council last met on November 1, 2024. The Wildfire Safety Community Advisory Council (WSCAC) is comprised of several important stakeholders in the SDG&E community and includes representatives from local and tribal governments, public safety partners, and Access and Functional Needs communities.

The WSCAC convened on May 9, 2025. At the meeting, SDG&E discussed SDG&E's Climate Adaptation Vulnerability Assessment (CAVA), Winter Recap and Fire Season Outlook, and an overview of SDG&E's 2026-2028 Wildfire Mitigation Plan (WMP). SDGE's CAVA prioritizes multiple hazards in a comprehensive document which is updated every 4 years. Through the CAVA process, SDG&E engages the community to understand local needs and priorities through surveys and workshops. The scope of the assessment provides projections for SDGE's infrastructure for 2030, 2050, and 2070, and enables dynamic, data-driven climate intelligence for preparing for climate impacts especially for our most vulnerable customers. WSCAC attendees emphasized that future temperature increases will impact communities, necessitating planning for additional resources and budgets. SDG&E's review of the fire season outlook highlighted that a dry winter has the stage for a potentially active wildfire season. Further, California's water year has seen below-normal precipitation and snow water content. SDG&E also reviewed key components of its 2026-2028 WMP submission, highlighting how it is balancing affordability and risk reduction through thoughtful consideration of life cycle costs.

### **III. NOTICE**

This filing will be submitted to the Office of Energy Infrastructure Safety, the Executive Director of the California Public Utilities Commission, and posted to SDG&E's website (<https://www.sdge.com/2026-2028-wildfire-mitigation-plan>).

Respectfully submitted,

*/s/ Laura M. Fulton*

Attorney for  
San Diego Gas and Electric Company