



Public Utilities Commission
STATE OF CALIFORNIA

Citation Date: June 24, 2025
Citation #: WSEB-1 W.25-06-001
Utility/Operator ID#: U 902 E

CITATION
ISSUED PURSUANT TO RESOLUTION WSEB-1

Electrical Corporation (Utility) To Which Citation is Issued:

San Diego Gas & Electric (U 902 E)

OFFICERS OF THE RESPONDENT

Clay Faber
Director, Regulatory Affairs
San Diego Gas & Electric Company (SDG&E)
8330 Century Part Ct.
San Diego, CA 92123

CITATION

San Diego Gas & Electric Company (SDG&E or Utility) is cited for six violations, resulting in a financial penalty of \$11,090. This fine is a result of the California Public Utilities Commission (Commission) Safety and Enforcement Division's (SED) investigation into SDG&E's Public Safety Power Shutoff (PSPS) from October 29 through 31, 2023. Through its investigation, SED identified that SDG&E violated Decision (D.) 19-05-042, D.20-05-051, D.21-06-014, and D.21-06-034.

VIOLATIONS

SDG&E is cited for violations of D.19-05-042, D.20-05-051, D.21-06-014, and D.21-06-034 as described below.

1. D.19-05-042 Appendix A at A8 states in part:
The electric investor-owned utilities should, whenever possible, adhere to the following minimum notification timeline:
 - *48-72 hours in advance of anticipated de-energization: notification of public safety partners/priority notification entities.*
 - *24-48 hours in advance of anticipated de-energization: notification of all other affected customers/populations.*
 - *1-4 hours in advance of anticipated de-energization, if possible: notification of all affected customers/populations.*
 - *When de-energization is initiated: notification of all affected customers/populations.*



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- *Immediately before re-energization begins: notification of all affected customers/populations.*
- *When re-energization is complete: notification of all affected customers/populations.*

For the October 29 through 31 PSPS event, SDG&E failed to identify and report any advance notification failures. Upon review of the notification timeline, SDG&E first notified its public safety partners on October 26 at 20:37 that the estimated de-energization start time was October 29 at 12:00. The first notification to customers was on October 28 at 19:13. SDG&E did not meet the 24-48 hour notification window in advance of anticipated de-energization to 1,109 customers.

2. D.19-05-042 Appendix A at A16 states in part:

Notification Preceding a De-Energization Event - The electric investor-owned utilities must convey to public safety partners at the time of first notification preceding a de-energization event information regarding the upcoming de-energization, including estimated start time of the event, estimated duration of the event, and estimated time to full restoration.

The notification to public safety partners only provided the estimated start time and duration of the event. SDG&E failed to provide the estimated time of full restoration as required.

3. D.19-05-042 Appendix A at A17 states in part:

Notification Preceding a De-energization Event - The electric investor-owned utilities must partner with local public safety partners to communicate with all other customers that a de-energization event is possible, the estimated start date and time of the de-energization event, the estimated length of the de-energization event, which may be communicated as a range, and the estimated time to power restoration, which again, may be communicated as a range.

SDG&E's text/SMS script notification to customers did not include the estimated length of the de-energization event and the estimated time of power restoration.

4. D.20-05-051 Appendix A, (h) at 9) states in part:

Each electric investor-owned utility shall report on all potential or active de-energization events in its post event reports. These reports shall include a thorough and detailed description of the quantitative and qualitative factors it considered in calling, sustaining, or curtailing each de-energization event (including information regarding why the de-energization event was a last resort option) and a specification of the factors that led to the conclusion of the de-energization event.

SDG&E failed to meet this requirement. SDG&E only reported:

The NWS stated in their forecast discussion that there would be elevated fire conditions with periods of critical fire weather. The FPI was Elevated (12 and 13), and the SAWTI was 'No Rating'. Winds in several communities were forecast to meet or exceed alert speed thresholds. While fire risk was forecast to be elevated due to high winds, low relative humidities, and critical fine dead fuel moistures (below 7%), the limiting factor



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for extreme large fire growth was the higher-than-normal Live Fuel Moisture throughout the region. As winds strengthened through the event, 30-second read capabilities were initiated in locations where alert speed thresholds were approached, allowing for near real-time observations of wind gusts that could be closely monitored and compared to historical gust statistics.

This description only indicates what SDG&E considered in calling a potential PSPS. SDG&E failed to provide a thorough and detailed description of the quantitative and qualitative factors it considered in curtailing and concluding this event, as well as information regarding why the de-energization event was a last resort option and a specification of the factors that led to the conclusion of the de-energization event.

5. D.21-06-014, *Ordering Paragraph 20 at 289* states in part:
Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company must include in the 10-day post-event reports the names of all entities invited to the utility's emergency operations centers for a Public Safety Power Shutoff event, the method used to make this invitation, and whether a different form of communication was preferred by any entity invited to the utility's emergency operations center.

For the October 29-31, 2023, PSPS event, SDG&E only reported "it has a standing, open invitation to CalOES and the Commission to embed a liaison in its virtual EOC." While SDG&E provided a list of entities with whom SDG&E coordinated, SDG&E failed to clearly report whether the list of entities were invited to its EOC, the method used to make this invitation, and whether a different form of communication was preferred by any entity invited to the utility's Emergency Operations Center.

6. D.21-06-034, *Appendix A at A2* states in part:
Prior to a PSPS event, immediately after the utility decides on which Community Resource Centers (CRC) locations to open during the PSPS event, the utility must provide notice to customers of the locations of the CRCs, the services available at each CRC, the hours of operation of each CRC, and where to access electricity during the hours the CRC is closed. This notice must be provided in all available means, including, but not limited to, text messages and on the utilities' websites.)

The text message notification script issued by SDG&E for the CRCs stated only: "For details, please visit SDGE.com/Ready and monitor your texts for more updates." SDG&E's text message notification did not clearly specify where customers could find the locations of the CRCs, the services available at each CRC, the hours of operation of each CRC, and where to access electricity during the hours the CRC is closed.

ENCLOSURES

The following attached enclosures were used to establish the findings of fact:

Enclosure 1 – SED's Notice of Violation, dated December 4, 2024



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Enclosure 2 – SDG&E’s Response to Notice of Violation, dated January 6, 2025

STATEMENT OF FACTS

The above violations are documented in the attached Enclosure 1 – SED’s Notice of Violation (NOV), which is based on SDG&E’s post event report, post season report, and submitted comments in response to the reports.

BACKGROUND

On October 29 through 31, 2023, SDG&E initiated its PSPS protocols in response to a high wind event that could pose as safety risk in its service territory. As a result of the PSPS determination, SDG&E notified 1,109 customers of potential power de-energization. SDG&E ultimately determined that de-energization was not necessary, and no customers ended up losing power as a result.

By virtue of initiating PSPS protocols, SDG&E was required to comply with Resolution ESRB-8, D.19-05-042, D.20-05-051, D.21-06-014, D.21-06-034 and the Administrative Law Judge’s Ruling on Post Event Report Template. SDG&E submitted its post event report on November 14, 2023, and its post season report on March 1, 2024.

SED reviewed the Post Event Report, Post Season Report and Stakeholder Comments to evaluate SDG&E’s compliance with PSPS requirements. On December 4, 2024, SED issued its Notice of Violation which identified six violations resulting from the PSPS event (see Enclosure 1). SDG&E responded on January 6, 2025, with its Response to SED’s Notice of Violation (see Enclosure 2).

Violation 1

SDG&E failed to provide advance notifications to 1,109 customers. SDG&E first notified its public safety partners on October 26 at 20:37 that an estimated de-energization was set for October 29 at 12:00 PM. SDG&E’s first notification to customers was not until October 28 at 19:13. SDG&E failed to meet the 28–48-hour advance notice requirement in D.19-05-042.

Violation 2

SDG&E’s notification to public safety partners did not include the estimated time of full restoration as required in D.19-05-042.

Violation 3

The text/SMS script notification SDG&E provided to customers did not include the estimated outage duration and the estimated time of power.



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Violation 4

SDG&E’s report did not include a description of the quantitative and qualitative factors in curtailing and concluding the PSPS event, as required by D.20-05-051.

Violation 5

SDG&E’s report did not include clear identification of the entities that were invited to its EOC, the method used to make this invitation, and whether a different form of communication was preferred by any entity invited to the utility’s Emergency Operations Center.

Violation 6

The text/SMS script notification SDG&E provided to customers did not clearly specify where customers could find the locations of the CRCs, the services available at each CRC, the hours of operation of each CRC, and where to access electricity during the hours the CRC is closed.

SED CITATION ANALYSIS

Element	Staff Finding
Number of violations and duration of violations	<ol style="list-style-type: none"> 1. 1,109 notice violations of D.19-05-042 (October 29, 2023). 2. One violation of D.19-05-042. 3. One violation of D.19-05-042 (October 29, 2023). 4. One violation of D.20-05-051 (October 29, 2023). 5. One violation of D.21-06-014 (October 29, 2023). 6. One violation of D.21-06-034 (October 29, 2023).
Severity or gravity of the offense	<p>Economic Harm: None. Physical Harm: None. Regulatory Harm/Number of Violations: One thousand, one hundred and nine notice violations of D.19-05-042, two other violations of D.19-05-042, one violation of D.20-05-051, one violation of D.21-06-014, and one violation of D.21.06-034.</p>
Conduct of the utility	SDG&E was forthcoming in providing SED with information regarding the notification failures in both the Post-Event Reports and SDG&E’s NOV Response.



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<p>Prior history of similar violation(s)</p>	<p>SED’s investigations of prior PSPS events have found that SDG&E failed to meet the requirements of D.19-05-042, D.20-05-051 and D.21-06-014 on other occasions. Specifically, SDGE violated D.19-05-042 in 2020 by failing to notify 49 customers of de-energization and re-energization in its 2020 PSPS events.</p>
<p>Self-reporting of the violation</p>	<p>SDG&E did not report the notification failure. SED discovered the notification failure when it reviewed the Post Event Report.</p>
<p>Financial resources of the utility</p>	<p>SDG&E is one of the largest electric utilities in the state of California in terms of customers and revenue. This amount is enough to emphasize the importance of complying with the notification requirements relative to its size.</p>
<p>The totality of the circumstances</p>	<p>Aggravating factors include:</p> <ul style="list-style-type: none"> • SDG&E failed to provide advance notification of the PSPS event to customers in the area of concern . <p>Mitigating factors include:</p> <ul style="list-style-type: none"> • No customers were de-energized during this PSPS.
<p>The role of precedent</p>	<p>This is the first Commission issued citation under Resolution WSEB-1. The Commission has previously issued Administrative Enforcement Orders (AEO) on SDG&E regarding its PSPS events. In 2020, SDG&E initiated five PSPS events. During one event on September 8-9,2020, 49 customers never received notifications during de-energization or re-energization. SED issued a proposed AEO alleging SDG&E violated the PSPS notification requirements under D.19-05-042 and assessed a fine of \$24,000. SED also imposed eight corrective actions to ensure future compliance with the Commission’s PSPS rules. SDG&E accepted the proposed AEO. The Commission adopted the proposed AEO in Resolution M-4863.</p>
<p>Resultant citation taking all of these factors into account</p>	<p>The penalty is \$11,090 (Eleven thousand, ninety dollars) consistent with the table of specified violations and scheduled fines in Resolution WSEB-1, Appendix B.</p> <p>The schedule allows for fines of \$500 to \$1,000 per missed PSPS Notice, or per accumulation of PSPS Notice. Resolution M-4846 and Resolution WSEB-1 provide the factors to apply to determine the appropriate penalty within that range, which are discussed in this citation’s analysis section.</p>



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RESPONSE:

Respondent is called upon to provide a response to this Citation by: **5:00 PM on July 24, 2025**. By way of such response, Respondent, **within 30 calendar days**, must either pay the amount of the penalty set forth in this citation,¹ or appeal² the citation. In addition, the Respondent must do one of the following:

- 1) For violations constituting immediate safety hazards: Respondent must immediately correct the immediate safety hazards.
- 2) For violations that do not constitute immediate safety hazards: Violations that do not constitute immediate safety hazards must be corrected within 30 days after the citation is served. If said violations that do not constitute immediate safety hazards cannot be corrected within 30 days, then the Respondent must submit a detailed Compliance Plan to the Director of SED within 30 days after the citation issues, unless the utility and the Director of SED, before the expiration of the 30-day period, agree in writing to another date, reflecting the soonest that the Respondent can correct the violations. The Compliance Plan must provide a detailed description of when the violation will be corrected, the methodology to be utilized, and a statement supported by a declaration from the Respondent's Chief Executive Officer or appropriate designee (CEO Declaration) stating that in the Respondent's best judgment, the time that will be taken to correct the violation will not affect the safety or integrity of the operating system or endanger public safety.

Note: Respondent will forfeit the right to appeal the citation by failing to do one of the options outlined above within 30 days. Payment of a citation or filing a Notice of Appeal does not excuse the Respondent from curing the violation. The amount of the penalty may continue to accrue until a Notice of Appeal is filed. Penalties are stayed during the appeal process. A late payment will be subject to a penalty of 10% per year, compounded daily and to be assessed beginning the calendar day following the payment-due date. The Commission may take additional action to recover any unpaid fine and ensure compliance with applicable statutes and Commission orders.

¹ For fines paid pursuant to Public Utilities Code (Pub. Util. Code) Section 2107 and Decision (D.) 16-09-055 Respondent shall submit a certified check or wire transfer payable to California Public Utilities Commission using the attached Citation Payment Form. Upon payment, the fine will be deposited in the State Treasury to the credit of the General Fund and this citation will become final.

² Respondent may Appeal this citation by completing and submitting a Notice of Appeal Form. Please see the attached document, "Directions For Submitting An Appeal To A Citation Issued Pursuant to Decision 16-09-055" for information on the appeals process and the attached "Notice of Appeal Of Citation Form."



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NOTIFICATION TO LOCAL AUTHORITIES:

As soon as is reasonable and necessary, and no later than 10 calendar days after service of the citation is effected, Respondent must provide a notification to the Chief Administrative Officer or similar authority in the city and county where the violation occurred. Within 10 days of providing such notification, Respondent must serve an affidavit to the Director of SED, at the mail or e-mail address noted below, attesting that the local authorities have been notified; the date(s) for when notification was provided; and the name(s) and contact information for each local authority so notified.

The Commission expects the Utility to take actions, as soon as feasible, to correct, mitigate, or otherwise make safe all violations noted on the Citation regardless of the Utility's intentions to accept or appeal the violation(s) noted in the Citation.

Leslie L
Palmer

Digitally signed by
Leslie L Palmer
Date: 2025.06.24
08:02:57 -07'00'

Lee Palmer
Director

Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Leslie.Palmer@cpuc.ca.gov



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CITATION PAYMENT FORM

I (we) _____ hereby agree to comply with this citation dated _____,
and have corrected/mitigated the violation(s) noted in the citation on _____ and no later
than _____, _____ all work to make permanent corrections to any mitigated, or
otherwise remaining concerns related to the violation(s) will be completed as noted in the
Compliance Plan we have submitted to the Director of SED and, herewith, pay a fine in the
amount of
\$ _____ as included in the citation.

Signature of Electrical Corporation’s Treasurer, Chief
Financial Officer, or President/Chief Executive Officer, or
delegated Officer thereof

(Signature) (Date)

(Printed Name and Title)

Payment must be with a certified check or wire transfer made payable to the **California Public Utilities Commission** and sent to the below address. Please include the citation number on the memorandum line of the check or money transfer to ensure your payment is properly applied.

California Public Utilities Commission
Attn: Fiscal Office
505 Van Ness Avenue
San Francisco, CA 94102-3298

NOTE: A copy of the completed Citation Payment Form must be sent to the Director of the Safety and Enforcement Division, via email or regular mail, to the address provided on the Citation.



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**DIRECTIONS FOR SUBMITTING AN APPEAL TO A CITATION
ISSUED PURSUANT TO RESOLUTION WSEB-1**

Within 30 calendar days of the Respondent being served with a **CITATION ISSUED PURSUANT TO RESOLUTION WSEB-1**, Respondent may appeal the citation. Beyond 30 calendar days of being served with the citation, Respondent is in default and, as a result, is considered as having forfeited rights to appeal the citation. The Respondent must still correct the violation(s) as instructed in the Response section of this citation.

To appeal the citation, Appellant must file a Notice of Appeal (including a completed title page complying with Rule 1.6 of the Commission's Rules of Practice and Procedure, and attached Notice of Appeal Form) along with copies of any materials the Appellant wants to provide in support of its appeal with the Commission's Docket Office **and** must serve the Notice of Appeal, at a minimum, on:

- 1) The Chief Administrative Law Judge (with an electronic copy to: ALJ_Div_Appeals_Coordinator@cpuc.ca.gov),
- 2) The Director of the Safety and Enforcement Division
- 3) The Executive Director of the California Public Utilities Commission
- 4) General Counsel
- 5) The Director of the Public Advocates Office at the California Public Utilities Commission

at the address listed below within 30 calendar days of the date on which the Appellant is served the Citation. The Appellant must file a proof of service to this effect at the same time the Appellant files the Notice of Appeal. The Notice of Appeal must at a minimum state: (a) the date of the citation that is appealed; and (b) the rationale for the appeal with specificity on all grounds for the appeal of the citation.

California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102
Attn: <Insert Title>

NOTE: Submission of a *Notice of Appeal Form* in no way diminishes Appellant's responsibility for correcting the violation described in the citation, or otherwise ensuring the safety of facilities or conditions that underlie the violations noted in the Citation.

Ex Parte Communications as defined by Rule 8.1(c) of the Commission's Rules of Practice and Procedure, are prohibited from the date the citation is issued through the date a final order is issued on the citation appeal.



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After receipt of the Appellant's *Notice of Appeal Form*, a hearing will be convened before an Administrative Law Judge. At least ten days before the date of the hearing, the Appellant will be notified and provided with the location, date, and time for the hearing. At the hearing,

- (a) Appellant may be represented by an attorney or other representative, but any such representation shall be at the sole expense of the Appellant;
- (b) Appellant may request a transcript of the hearing, but must pay for the cost of the transcript in accordance with the Commission's usual procedures;
- (c) Appellant is entitled to the services of an interpreter at the Commission's expense upon written request to the Chief Administrative Law Judge not less than five business days prior to the date of the hearing;
- (d) Appellant is entitled to a copy of or electronic reference to "Resolution ALJ-377 Modifies and Makes Permanent the Citation Appellate Rules and General Order 156 Appellate Rules (Citation Appellate Rules)"; and
- (e) Appellant may bring documents to offer in evidence (Rule 13.6 (Evidence) of the Commission's Rules of Practice and Procedure applies) and/or call witnesses to testify on Appellant's behalf. At the Commission's discretion, the hearing in regard to the Appellant's appeal can be held in a Commission hearing room at either of the following locations:

San Francisco:

505 Van Ness Avenue
San Francisco, CA 94102

Los Angeles:

320 West 4th Street, Suite 500
Los Angeles, CA 90013

The hearing(s) held in regard to the Appellant's appeal will be adjudicated in conformance with all applicable Public Utilities Code requirements.



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Enclosures to Accompany Utility Appeal

Utility to add list of Enclosures as appropriate:

2023 SDGE Post Event Report Notice of Violation



December 4, 2024

Clay Faber
Director, Regulatory Affairs
San Diego Gas & Electric Company (SDG&E)
8330 Century Part Ct
San Diego, CA 92123

SUBJECT: Notice of Violation – San Diego Gas & Electric Company
2023 Public Safety Power Shutoff Post Event Reports

Mr. Faber:

On behalf of the Wildfire Safety and Enforcement Branch (WSEB) within Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC or Commission), Cindy Chen of my staff conducted compliance assessment of San Diego Gas & Electric Company (SDG&E) 2023 Public Safety Power Shutoff (PSPS) post event reports. In 2023, SDG&E initiated one PSPS event and submitted one post event report. (see below)

SDG&E 2023 PSPS Summary

Report #	Dates	Total Customers Notified	Total Customers De-energized	Medical Baseline Customers De-energized	Number of Counties De-energized	Number of Tribes De-energized
1	Oct. 29 – Oct. 31	1,109	0	0	0	0

SED reviewed the submitted post event report and post season report filed on March 1, 2024, considered stakeholder comments to evaluate SDG&E’s compliance with the reporting requirements under Resolution ESRB-8, Decision (D.)19-05-042, D.20-05-051, D.21-06-014, D.21-06-034 and Administrative Law Judge’s Ruling on Post Event Report Template.

Our assessment revealed SDG&E did not comply with certain provisions of Commission decisions D.19-05-042, D.20-05-051, D.21-06-014, D.21-06-034 and the Ruling on Post Event Report Template.

1. D.19-05-042 Appendix A states in part “The electric investor-owned utilities

should, whenever possible, adhere to the following minimum notification timeline:

- *48-72 hours in advance of anticipated de-energization: notification of public safety partners/priority notification entities.*
- *24-48 hours in advance of anticipated de-energization: notification of all other affected customers/populations.*
- *1-4 hours in advance of anticipated de-energization, if possible: notification of all affected customers/populations.*
- *When de-energization is initiated: notification of all affected customers/populations.*
- *Immediately before re-energization begins: notification of all affected customers/populations.*
- *When re-energization is complete: notification of all affected customers/populations.” (D.19-05-042 at A8)*

For the October 29-31 event, SDG&E did not identify and report any advance notification failures. Upon review of the notification timeline, SDG&E first notified its public safety partners on October 26 at 8:37pm that the estimated de-energization start time was October 29 noon,¹ the first notification to customers was on October 28, 19:13.² SDG&E did not meet the 24-48 hour in advance of anticipated de-energization to 1,109 customers.

2. ***D.19-05-042 Appendix A states in part “Notification Preceding a De-Energization Event - The electric investor-owned utilities must convey to public safety partners at the time of first notification preceding a de-energization event information regarding the upcoming de-energization, including estimated start time of the event, estimated duration of the event, and estimated time to full restoration.” (D.19-05-042 at A16)***

The notification to public safety partners only provided the estimated start time and duration of the event.³ SDG&E did not provide the estimated time of full restoration.

3. ***D.19-05-042 Appendix A states in part “Notification Preceding a De-energization Event - The electric investor-owned utilities must partner with local public safety partners to communicate with all other customers that a de-energization event is***

¹ SDG&E Oct. 29-31, 2023, Post Event Report, pdf p. 74.

² SDG&E Oct. 29-31, 2023, Post Event Report, pdf p. 37.

³ SDG&E Oct. 29-31, 2023, Post Event Report, pdf p. 74-81.

possible, the estimated start date and time of the de-energization event, the estimated length of the de-energization event, which may be communicated as a range, and the estimated time to power restoration, which again, may be communicated as a range.” (D.19-05-042 at A17)

The text/SMS script notification to customers did not include the estimated outage duration and the estimated time of power restoration, and did not direct the customers to its website for such information.

4. ***D.20-05-051 states in part “Each electric investor-owned utility shall report on all potential or active de-energization events in its post event reports. These reports shall include a thorough and detailed description of the quantitative and qualitative factors it considered in calling, sustaining, or curtailing each de-energization event (including information regarding why the de-energization event was a last resort option) and a specification of the factors that led to the conclusion of the de-energization event.” (D.20-05-051, Appendix A, (h) at 9)***

SDG&E only reported “The NWS stated in their forecast discussion that there would be elevated fire conditions with periods of critical fire weather. The FPI was Elevated (12 and 13), and the SAWTI was ‘No Rating’. Winds in several communities were forecast to meet or exceed alert speed thresholds. While fire risk was forecast to be elevated due to high winds, low relative humidities, and critical fine dead fuel moistures (below 7%), the limiting factor for extreme large fire growth was the higher-than-normal Live Fuel Moisture throughout the region. As winds strengthened through the event, 30-second read capabilities were initiated in locations where alert speed thresholds were approached, allowing for near real-time observations of wind gusts that could be closely monitored and compared to historical gust statistics.”⁴ This description only indicates what SDG&E considered in calling a potential PSPS. SDG&E did not report the quantitative and qualitative factors it considered in curtailing and concluding this event.

5. ***D.21-06-014 states in part “Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company must include in the 10-day post-event reports the names of all entities invited to the utility’s emergency operations centers for a Public Safety Power Shutoff event, the method used to make this invitation, and whether a different form of communication was preferred by any entity invited to the utility’s emergency operations center.” (D.21-06-014, OP20 at 289)***

⁴ SDG&E Oct. 29 – 31, 2023, Post Event Report, p. A-6.

For the October 29-31 event, SDG&E only reported “it has a standing, open invitation to CalOES and the CPUC to embed a liaison in its virtual EOC.” Further SDG&E provided a list of entities with whom SDG&E coordinated.⁵ SDG&E did not clearly report whether the list of entities were invited to its EOC, the method used to make this invitation, and whether a different form of communication was preferred by any entity invited to the utility’s Emergency Operations Center.

6. *D.21-06-034 states in part “Prior to a PSPS event, immediately after the utility decides on which Community Resource Centers (CRC) locations to open during the PSPS event, the utility must provide notice to customers of the locations of the CRCs, the services available at each CRC, the hours of operation of each CRC, and where to access electricity during the hours the CRC is closed. This notice must be provided in all available means, including, but not limited to, text messages and on the utilities’ websites.” (D21-06-034 at A2)*

The text message notification script for the CRCs only states “For details, please visit SDGE.com/Ready and monitor your texts for more updates.” = It did not clearly specify whether customers can find the locations of the CRCs, the services available at each CRC, the hours of operation of each CRC, and where to access electricity during the hours the CRC is closed.

Please advise me no later than January 6, 2025, of corrective measures taken by PG&E to remedy and prevent the future recurrence of the identified violations, or provide additional data that refutes the violations detailed in this Notice of Violation. Based on your response, this Notice of Violation may lead to an enforcement action. If you have any questions, you can contact Cindy Chen at (415) 660-8312 or email Cindy.Chen@CPUC.CA.gov.

Sincerely,

ANTHONY NOLL

Program Manager,
Wildfire Safety and Enforcement Branch
Safety and Enforcement Division

⁵ SDG&E Oct. 29-31, Post Event Report, p. A-16.

Clay Faber
San Diego Gas & Electric Company (SDG&E)
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California Public Utilities Commission

cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Ronald DeMayo, Program and Project Supervisor, WSEB, SED, CPUC
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SDGE Response to 2023 PSPS Notice of Violation



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Mr. Anthony Noll
Program Manager
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California Public Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Re: San Diego Gas & Electric Company's Response to WSEB's Notice of Violation Letter for SDG&E's 2023 Public Safety Power Shutoff Events

Dear Mr. Noll,

On December 4, 2024, the Wildfire Safety and Enforcement Branch (WSEB) within the Safety and Enforcement Division ("SED") of the California Public Utilities Commission (CPUC or Commission) issued a Notice of Violation ("NOV") that found that San Diego Gas & Electric Company ("SDG&E") in violation of a Commission Resolution, Administrative Law Judge's email ruling, and other applicable Commission decisions with respect to its execution and reporting of PSPS events in 2023. The NOV directed SDG&E to advise WSEB no later than January 6, 2025 of corrective measures taken by SDG&E to remedy and prevent the future recurrence of the identified violations, or provide additional data that refutes the violations detailed in the NOV. Additional detail on the alleged violations and any applicable corrective measures for all but two violations follows below. SDG&E respectfully refutes one violation related to not directing customers to SDG&E's website via SMS/text messages, and provides additional clarity regarding SDG&E's SMS/text message practices that relate to alleged violations for text message script notifications, as further summarized below.

2023 PSPS Event Violations

- 1) **For the October 29-31 event, SDG&E did not identify and report any advance notification failures. Upon review of the notification timeline, SDG&E first notified its public safety partners on October 26 at 8:37pm that the estimated de-energization start time was October 29 noon,¹ the first notification to customers was on October 28, 19:13.² SDG&E did not meet the 24-48 hour in advance of anticipated de-energization to 1,109 customers.**

¹ SDG&E Oct. 29-31, 2023, Post Event Report, pdf p. 74.

² SDG&E Oct. 29-31, 2023, Post Event Report, pdf p. 37.

SDG&E Response:

SDG&E did not report any missed notifications because, as based on its understanding of the notification requirements, SDG&E did not miss any customer notifications and all required notifications were made during appropriate timeframes. As indicated in Section 1 - Executive Summary of SDG&E's PSPS Post Event Report, "[w]inds began increasing Sunday evening, October 29, reaching their first peak the next morning [October 30]." SDG&E's weather models also indicated the potential for PSPS during the overnight hours of Sunday night (10/29) into Monday morning (10/30). SDG&E's customer notifications at 19:13 on October 28 thus met the 24-48 hour notification requirements, as SDG&E understood the notification requirement to be "24-48 hours in advance of ***anticipated de-energization***" not "24-48 hours in advance ***of the period of concern***." (Emphasis added). As such, SDG&E did not report any missed 24-48 hour advanced notifications since the onset of the weather occurred later than originally anticipated. SDG&E also notes that no customers were ultimately de-energized during this event.

Based on the language of the NOV, SDGE has come to understand that WSEB interprets the requirement for customer notifications to be based on the overall period of concern established, rather than the forecast wind speed for each particular region. SDG&E has begun to tailor its customer notification timeframes accordingly. Additionally, in order to support customer notifications and ensure compliance with CPUC notification requirements, SDGE has developed and implemented a new Customer Notification System (CNS) that provides enhanced notification and reporting capabilities. The new CNS system was successfully deployed twice in 2024.

- 2) **The notification to public safety partners only provided the estimated start time and duration of the event.³ SDG&E did not provide the estimated time of full restoration.**

SDG&E Response:

During the October 29-31 event, SDG&E's notification to public partners stated, "The estimated start time of the PSPS is Sunday, October 29 at noon. We anticipate it could last until Tuesday, October 31 at 1 p.m. Please note that if power is turned off for safety, restoration is dependent on weather conditions and can change." SDG&E considered it redundant to provide the estimated time of full restoration, as it was the same as the anticipated duration of the event. Further, SDG&E believed that delineating the duration of the event versus the time of full restoration could cause unnecessary confusion. Thus, SDG&E believed it had included all required times in the public safety partner notification.

Based on the NOV and other information obtained after the 2023 events, SDG&E understands that WSEB would like SDG&E to include both the estimated duration of the

³ SDG&E Oct. 29-31, 2023, Post Event Report, pdf p. 74-81.

event as well as estimated full restoration time in future notifications. Going forward, all notification templates to public safety partners will include this information. SDG&E confirms its November 6-8, 2024, and December 9-11, 2024, PSPS events included the estimated start time of the event, estimated duration of the event, and estimated time to full restoration. Examples provided in Figures 1 and 2 below.

Specifically, the following language has been added and will be reflected in the public safety partner notifications included as Appendix 2 of the December 9-11, 2024 PSPS post-event report:

“The estimated start time of event is (INSERT TIME AND DATE). The estimated duration of this event is (INSERT TIME AND DATE). We anticipate the time of full restoration will be (INSERT TIME AND DATE).”

Figure 1 - Example from November 6-8, 2024 PSPS event

Email Subject:

SDG&E Public Safety Power Shutoff Possible in 72 Hours

Email Body:

This is an important safety message from SDG&E. This information is intended for public safety and government partners. Please do not share this message publicly.

SDG&E is monitoring possible high fire weather conditions forecasted to begin within 48-72 hours.

These conditions may force SDG&E to initiate a Public Safety Power Shutoff (PSPS) where we proactively turn off power to reduce the risk of a wildfire for customers in high-risk areas. The estimated start time of the PSPS is approximately 12:00 p.m. on Wednesday, November 6. We anticipate it could last until approximately 5:00 p.m. Thursday, November 7, with power being turned back on around Friday, November 8. Please note that power restoration is dependent on weather conditions and can change.

Figure 2 - Example from November 6-8, 2024 PSPS event

Email Subject:

SDG&E Public Safety Power Shutoff Possible in 72 Hours. SDG&E's Emergency Operations Center Activated at 12:15 p.m.

Email Body:

This is an important safety message from SDG&E. This information is intended for public safety and government partners. Please do not share this message publicly.

SDG&E is monitoring possible high fire weather conditions forecasted to begin within 48-72 hours. The National Weather Service has issued a Fire Weather Watch for Inland Orange County and the San Diego County valleys and mountains beginning at 10 a.m. on Monday, December 9 to 4 a.m. Wednesday, December 11.

These conditions may force SDG&E to initiate a Public Safety Power Shutoff (PSPS) where we proactively turn off power to reduce the risk of a wildfire for customers in high-risk areas. SDG&E's Emergency Operations Center activated at 12:15 p.m. on Friday, December 6. The estimated start time of event is noon on Monday, December 9. The estimated duration of this event is approximately five days. We anticipate the time of full restoration will be noon on Friday, December 13. Please note that power restoration is dependent on weather conditions and can change.

- 3) **The text/SMS script notification to customers did not include the estimated outage duration and the estimated time of power restoration, and did not direct the customers to its website for such information.**

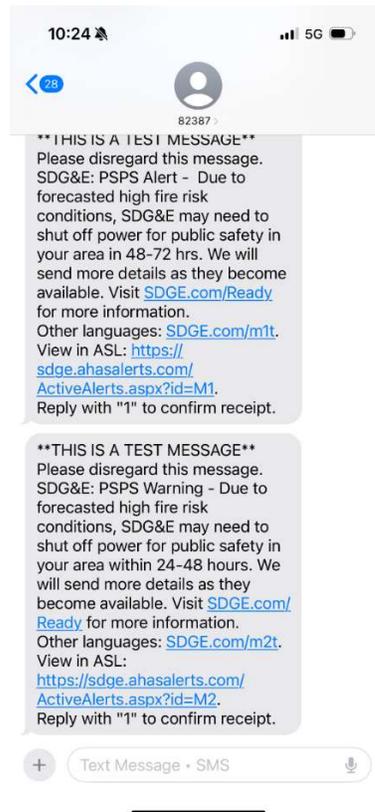
SDG&E Response:

SDG&E respectfully disagrees with the NOV finding that “SDG&E did not direct the customers to its website for such information.” SDG&E’s text/SMS scripts included the [sdge.com/ready](https://www.sdge.com/ready) link in every message, which directs customers to SDG&E’s PSPS landing page with real-time updates and system conditions. Specifically, the text of the messages included in SDG&E’s Post Event Report included the language “Please visit [sdge.com/Ready](https://www.sdge.com/Ready) for the most up to date information and additional support.”⁴ While the hyperlink may not have been apparent from the Post-Event Report text, smart phone and text messaging capabilities automatically hyperlink any URL with a “.com” to that web page. (Figure 3 below is a screenshot of a TEST text message from SDG&E’s Customer Notification System demonstrating that the [sdge.com/ready](https://www.sdge.com/ready) message is a live link).

⁴ SDG&E Oct. 29-31, 2023, Post Event Report, Appendix 1 pdf p. 38.

Due to the unpredictable nature of weather activity, as well as the need to limit characters in text/SMS messages for clarity, it is not beneficial to include estimated outage timeframes in our text message notifications. The text/SMS messages direct customers to SDG&E’s live PPS web page, which offers the most current information from our outage map. This page provides real-time system conditions, including latest updates on estimated outage durations and restoration times. Because weather is so dynamic, SDG&E elects to direct customers via link to a resource that includes the most real-time updated information.

Figure 3 - Example of test text message notification



- 4) **SDG&E only reported “The NWS stated in their forecast discussion that there would be elevated fire conditions with periods of critical fire weather. The FPI was Elevated (12 and 13), and the SAWTI was ‘No Rating’. Winds in several communities were forecast to meet or exceed alert speed thresholds. While fire risk was forecast to be elevated due to high winds, low relative humidities, and critical fine dead fuel moistures (below 7%), the limiting factor for extreme large fire growth was the higher-than-normal Live Fuel Moisture throughout the region. As winds strengthened through the event, 30-second read capabilities were initiated in locations where alert speed thresholds were approached, allowing for near real-time observations of wind gusts that could be closely monitored and compared to**

historical gust statistics.”⁵ This description only indicates what SDG&E considered in calling a potential PSPS. SDG&E did not report the quantitative and qualitative factors it considered in curtailing and concluding this event.

SDG&E Response:

SDG&E better understands this requirement and going forward, SDG&E will include additional quantitative and qualitative factors considered in curtailing and concluding PSPS events, as available, and has added additional notes and comments to its post-event report template highlighting the requirement.

To demonstrate its ongoing improvements, SDG&E respectfully points out that its December 9-11, 2024 Post-Event Report included the following information in Section 2.2 regarding factors that led to concluding the PSPS event, with emphasis added on particularly relevant considerations:

“SDG&E considered several critical factors when deciding to conclude this de-energization event:

- **Observed and Forecasted Wind Gusts:** Wind gusts for all circuits within the scope of the de-energization event were monitored closely. *Both observed and forecasted wind speeds no longer met the threshold criteria for de-energization, indicating a reduced risk of wildfire ignition due to high winds.*
- **Fire Potential Index (FPI) Rating:** The FPI rating, which assesses the environmental receptiveness to fire ignition and spread based on weather and fuels conditions, was lowered from an Extreme rating to Elevated. *This reduction in the FPI rating suggested that the conditions were less conducive to wildfire outbreaks.*
- **Post-Patrol Activities and Corrective Actions:** Comprehensive post-patrol inspections and necessary corrective actions were completed for all circuits within the scope. *These activities ensured that any damage or hazards identified during the de-energization period were addressed, further reducing the risk of wildfire ignition upon re-energization.*
- **Coordination with Local Authorities:** SDG&E coordinated closely with local authorities, including firefighting resources, to ensure that all necessary support and information were in place.
- **Wildfire Risk Estimates:** Updated wildfire risk estimates were reviewed, taking into account the latest weather data, vegetation conditions, and other relevant factors. *These estimates indicated that the overall risk of wildfire had decreased to an acceptable level, supporting the decision to safely re-energize the circuits.*

By considering these factors, SDG&E ensured that the decision to conclude the de-energization event was based on a thorough assessment of current conditions

⁵ SDG&E Oct. 29 – 31, 2023, Post Event Report, p. A-6.

and potential risks, prioritizing the safety of the community and the reliability of the electrical grid.”

- 5) **For the October 29-31 event, SDG&E only reported “it has a standing, open invitation to CalOES and the CPUC to embed a liaison in its virtual EOC.” Further SDG&E provided a list of entities with whom SDG&E coordinated.⁶ SDG&E did not clearly report whether the list of entities were invited to its EOC, the method used to make this invitation, and whether a different form of communication was preferred by any entity invited to the utility’s Emergency Operations Center.**

SDG&E Response:

Leading up to the PSPS season, SDG&E surveyed public safety partners to determine the best method for communicating and providing situational awareness updates during EOC activations. These public safety partners are listed in Appendix 5 of SDG&E’s 2023 Post-Event Report.⁷ The survey consensus was that public safety partners preferred to be communicated with directly via daily status update calls; no public safety partners indicated a preference for in-person coordination within the EOC. This effort enabled SDG&E and public safety partners to develop a mutually agreeable communications structure in lieu of holding seats in SDG&E’s EOC. No entity indicated a preference to receive a different form of communication or join the EOC in person.

SDG&E has added additional notes and comments to its post-event report template to highlight this requirement and ensure it is clearly communicated going forward. Specifically, SDG&E will note daily situational awareness briefing calls are the preferred and mutually agreeable communication structure held in lieu of holding seats in SDG&E’s Emergency Operations Center (EOC), and will, at least annually, reiterate to applicable public safety partners, including representatives from Cal OES, water infrastructure partners, and communication service providers, the standing invitation to embed a liaison in SDG&E’s EOC, either virtually or in person.

SDG&E confirms its November 6-8, 2024 post-event report included the following language in Section 6.2:

“SDG&E has a standing, open invitation to CPUC and CalOES to embed a liaison in our virtual EOC. In addition, SDG&E hosted daily State Executive briefing calls, which is the preferred form of communication by its public safety partners, and coordinated agency calls with potentially impacted public safety partners and critical facilities and infrastructure customers.”

SDG&E further enhanced the language included in Section 6.2 of the December 9-11, 2024 post-event report to state the following:

⁶ SDG&E Oct. 29-31 Post Event Report at A-16.

⁷ See, SDG&E Oct. 20-31 Post Event Report at A-16.

“SDG&E has a standing, open invitation to CPUC and CalOES to embed a liaison in our virtual EOC. In addition, SDG&E hosted daily State Executive briefing calls and situational awareness briefing calls with potentially impacted public safety partners and critical facilities and infrastructure customers. These calls serve as the preferred and mutually agreeable communications structure held in lieu of holding seats in the EOC for public safety partners. No entities have indicated a preference for a different form of communication.”

- 6) **The text message notification script for the CRCs only states “For details, please visit SDGE.com/Ready and monitor your texts for more updates.” It did not clearly specify whether customers can find the locations of the CRCs, the services available at each CRC, the hours of operation of each CRC, and where to access electricity during the hours the CRC is closed.**

SDG&E Response:

Text messaging best practices emphasize keeping notifications short, concise, and easy to read. Each communication channel should be tailored to maximize reach and effectiveness. Due to character limits imposed by various cell phone carriers, sending lengthy, detailed text messages can be challenging and lead to delivery issues and potential confusion. When messages exceed these limits, carriers may split them into multiple parts, which can lead to delivery out of sequence, thus rendering the messages confusing or even potentially unintelligible. Including the details listed regarding the CRCs would exceed various cell phone carrier limits, potentially inadvertently causing delivery issues and/or communication breakdowns. For this reason, to ensure clarity and reliability, especially in matters of public safety, SDG&E directs customers to the live PSPS web page through an embedded link in the SMS message, where customers can receive additional details regarding CRC operations. This page provides real-time system conditions and the most up-to-date information.

SDG&E appreciates the opportunity to respond and provide additional detail regarding the alleged violations related to SDG&E’s October 29-31, 2023 PSPS event. SDG&E continues to seek ongoing enhancements to its PSPS practices and operations, and believes that the corrective actions taken and described herein will continue to contribute to the safety of its customers, employees, and communities during PSPS events. If you have any additional questions, please feel free to contact me.

Respectfully submitted,

/s/ Brian D'Agostino

VP – Wildfire & Climate Science, SDG&E

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