BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities.	R.20-07-013 (Filed July 16, 2020)
(Not Consolidated	
Application of San Diego Gas & Electric Company (U 902 M) to Submit Its 2021 Risk Assessment and Mitigation Phase Report.	A.21-05-011 (Filed May 17, 2021)
And Related Matter.	A.21-05-014 (Consolidated)
Application of Southern California Gas Company (U 904 G) for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2024.	A.22-05-015 (Filed May 16, 2022)
And Related Matter.	A.22-05-016 (Consolidated)

2022 SAFETY PERFORMANCE METRICS REPORT OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)

Sharon L. Cohen

8330 Century Park Court, CP32D San Diego, California 92123-1530

Telephone: (619) 696-4355 Facsimile: (619) 699-5027 Email: SLCohen@sdge.com

Attorney for:

SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities.	R.20-07-013 (Filed July 16, 2020)
(Not Consolidated	I)
Application of San Diego Gas & Electric Company (U 902 M) to Submit Its 2021 Risk Assessment and Mitigation Phase Report.	A.21-05-011 (Filed May 17, 2021)
And Related Matter.	A.21-05-014 (Consolidated)
Application of Southern California Gas Company (U 904 G) for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2024.	A.22-05-015 (Filed May 16, 2022)
And Related Matter.	A.22-05-016 (Consolidated)

2022 SAFETY PERFORMANCE METRICS REPORT OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)

In compliance with Decision (D.) 19-04-020, Safety Model Assessment Proceeding
Phase Two Decision Adopting Risk Spending Accountability Report Requirements and Safety
Performance Metrics For Investor-Owned Utilities and Adopting a Safety Model Approach for
Small and Multi-Jurisdictional Utilities (S-MAP Phase Two Decision) and D.21-11-009,
Decision Addressing Phase I, Track 1 And 2 Issues (Risk OIR Phase One Decision), San Diego
Gas & Electric Company (SDG&E) timely submits its annual Safety Performance Metrics

Report (2022 SPMR).¹ This 2022 SPMR reports on the applicable 32 safety performance metrics to measure achieved safety improvements,² including how metrics are used to improve safety training, take corrective action and support risk-based decision making; information on any metrics that may be linked to financial incentives; and a summary of how the reported data reflects progress against the risk mitigation and management goals in the Test Year (TY) 2019 General Rate Cases (GRCs) of Southern California Gas Company (SoCalGas) and SDG&E and the 2016 SoCalGas and SDG&E Risk Assessment Mitigation Phase (RAMP) filing. Attachment "A" constitutes the 2022 Safety Performance Metrics Report and Attachment "B" constitutes 10 years of monthly historical data, where available, for all applicable metrics.³

Respectfully submitted,

By: /s/ Sharon L. Cohen
Sharon L. Cohen

Attorney for: SAN DIEGO GAS & ELECTRIC COMPANY 8330 Century Park Court, CP32D San Diego, California 92123-1530 Telephone: (619) 696-4355

Facsimile: (619) 699-5027 Email: <u>SLCohen@sdge.com</u>

March 30, 2023

In compliance with D.21-11-009, the Risk OIR Phase One Decision, this 2022 SPMR is being filed in and served on Application (A.) 21-05-011/014 and A.22-05-015/016 (cons.), the "most recent or current Risk Assessment Mitigation Phase (RAMP) and GRC proceeding," and on the successor S-MAP proceeding Rulemaking (R.) 20-07-013. SDG&E will also concurrently email the SPM report to RASA_Email@cpuc.ca.gov. D.21-11-009 (issued November 9, 2021) at Ordering Paragraph 9, p. 145.

In accordance with D.21-11-009, SDG&E is required to report on 29 metrics. However, metric number 12 – Natural Gas Storage Baseline Assessments Performed, while noted in Appendix B to D.21-11-009 as a required metric for SDG&E, does not apply since SDG&E does not have any natural gas storage facilities.

The Commission's Safety and Enforcement Division staff, via the S-MAP Technical Working Group, instructed the utilities to provide metric data in a native file format. Excel is not an accepted format for filing at the Commission, accordingly a PDF version of Attachment B will be filed and a native Excel version of Attachment B will be separately served on parties to the successor S-MAP proceeding R.20-07-013 and the most recent or current RAMP and GRC proceedings.

ATTACHMENT A



2022 Safety Performance Metrics Report March 30, 2023

TABLE OF CONTENTS

I.		INTRO	DDUCTION/OVERVIEW	1
		A.	Compliance with S-MAP Phase Two Decision and Risk OIR Phase One Decision Directives	6
	II.		TRICS OVERVIEW (D.19-04-020, ORDERING PARAGRAPH 6D AND 1-009)	6
		A.	Summary	6
		B.	Examples of Efforts to Improve Safety Performance	12
		C.	Examples of How Safety Performance Metrics Data is Used to Support Risk-Based Decision-Making	16
	III		KECUTIVE COMPENSATION AND BIAS CONTROLS – OVERVIEW 04-020, ORDERING PARAGRAPH 6.A - C)	19
		A.	Executive Incentive Compensation.	19
		B.	Bias Controls	22
	IV		NTERIM RISK MITIGATION ACCOUNTABILITY REPORT (RMAR) IREMENTS (D.19-04-020, ORDERING PARAGRAPHS 6E – 6F)	24
		A.	How Safety Metrics Reflect Progress Against SDG&E's RAMP and GRC Safety Goals	24
		B.	High-level Summary of SDG&E's Total Estimated Risk Mitigation Spending Level as Approved in the TY 2019 GRC	27
	V.	_	oproved Safety Performance Metrics (D.19-04-020, Ordering Paragraph 2 21-11-009)	32
		A.	Metric No. 1: Transmission & Distribution (T&D) Overhead Wires Down Non-Major Event Days	33
		В.	Metric No. 2: Transmission & Distribution (T&D) Overhead Wires Down - Major Event Days	36
		C.	Metric No. 3: Electric Emergency Response Time	39
		D.	Metric No. 4: Fire Ignitions	41
		E.	Metric No. 5: Gas Dig-In	47
		F.	Metric No. 6: Gas In-Line Inspection	50
		G.	Metric No. 7: Gas In-Line Inspection Upgrade	54
		H.	Metric No. 8: Gas Shut-In Time – Mains	56
		I.	Metric No. 9: Gas Shut-In Time - Services	60
		J.	Metric No. 10: Cross Bore Intrusions	63
		K.	Metric No. 11: Gas Emergency Response Time	65
		L.	Metric No. 13: Gas Pipelines That Can Be Internally Inspected	69

M.	Metric No. 14: Employee Days Away, Restricted and Transfer (DART) Rate	71
N.	Metric No. 15: Rate of Serious Injuries or Fatalities (SIF) Actual (Employe	e) 74
O.	Metric No. 16: Rate of SIF Actual (Contractor)	86
P.	Metric No. 17: Rate of SIF Potential (Employee)	89
Q.	Metric No. 18: Rate of SIF Potential (Contractor)	92
R.	Metric No. 19: Contractor Days Away, Restricted Transfer (DART)	95
S.	Metric No. 20: Public Serious Injuries and Fatalities	97
T.	Metric No. 21: Helicopter/Flight Accident or Incident	102
U.	Metric No. 25: Wires-Down not resulting in Automatic De-energization	105
V.	Metric No. 26: Missed Inspections and Patrols for Electric Circuits	107
W.	Metric No. 27: Overhead Conductor Size in High Fire Threat District (Tiers 2 and 3, HFTD)	108
X.	Metric No. 28: Gas Operation Corrective Actions Backlog	110
Y.	Metric No. 29: GO-95 Corrective Actions (Tiers 2 and 3, HFTD)	111
Z.	Metric No. 30: Gas Overpressure Events	114
AA.	Metric No. 31: Gas In-Line Inspections Missed	117
BB.	Metric No. 32: Overhead Conductor Safety Index	118

2022 Safety Performance Metrics Report

March 30, 2023

I. INTRODUCTION/OVERVIEW

SDG&E submits this annual Safety Performance Metrics Report in compliance with the California Public Utilities Commission's (Commission or CPUC) directives in Decisions (D.) 19-04-020, Phase Two Decision Adopting Risk Spending Accountability Report Requirements and Safety Performance Metrics for Investor-Owned Utilities and Adopting a Safety Model Approach for Small and Multi-Jurisdictional Utilities (S-MAP Phase Two Decision) and D.21-11-009, Decision Addressing Phase I, Track 1 And 2 Issues (Risk OIR Phase One Decision). The S-MAP Phase Two Decision requires the California investor-owned utilities (IOUs), including San Diego Gas & Electric Company (SDG&E or Company), to annually report on safety performance metrics (SPM) to measure achieved safety improvements.

On July 16, 2020, the Commission opened R.20-07-013 in an Order Instituting Rulemaking (OIR) to *Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities* (RDF Proceeding). Track 2 of the RDF Proceeding considered the need for new SPMs or revisions to existing SPMs adopted in the S-MAP Phase Two Decision. On November 9, 2021, the Commission issued D.21-11-009 (Risk OIR Phase One Decision),² which modified certain of the initial SPMs and adopted new metrics. The Risk OIR Phase One Decision directed the IOUs to adhere to the guidance on the submittal of SPMs adopted in the S-MAP Phase Two Decision when making their annual SPM report submissions. This means the IOUs will report on the applicable

In compliance with D.21-11-009, Ordering Paragraph 9 at 145, this 2022 Safety Performance Metrics Report is being filed in and served on Application (A.) 21-05-011/014 and A.22-05-015/016 (cons.), the "most recent or current Risk Assessment Mitigation Phase [(RAMP)] and General Rate Case [(GRC)] proceedings," and on the successor S-MAP proceeding Rulemaking (R.) 20-07-013. SDG&E will also concurrently email the SPM report to RASA_Email@cpuc.ca.gov.

D.21-11-009, issued in the RDF proceeding, modified certain of the original safety performance metrics and adopted new safety performance metrics (the Decision is referred to herein as "Risk OIR Phase One Decision").

original SPMs, as modified by the Risk OIR Phase One Decision (which modified certain existing SPMs, removed certain SPMs and added new SPMs).³ In accordance with both D.19-04-020 and D.21-11-009, in this Report SDG&E now reports on the 29 applicable SPMs⁴ using the designated definitions and units for the last ten years, January 1, 2013, through December 31, 2022, where such data exists, in the accompanying Excel file as Attachment B.⁵

SDG&E has tracked safety-related metrics for years and uses such metric data as part of its risk-informed decision-making and continuous improvement processes. Tracking and analyzing both leading and lagging indicators and comparing historical results provides a point of reference for safety processes and helps identify opportunities for continuous improvement.

SDG&E's safety efforts start at the top with appropriate safety governance and accountability. SDG&E's Chief Safety Officer has ultimate responsibility for the safe and reliable engineering, construction, operation and maintenance of the Company's gas, electric and generation resources. SDG&E's Chief Safety Officer, as chair of SDG&E's Safety Management System Executive Steering Team and Executive Safety Council, also oversees the various safety committees that help inform, educate, and solicit input from employees about safety issues throughout all levels of the Company and set meaningful and attainable safety goals throughout the organization. To promote strong safety principles throughout the Company, and foster a culture of continuous safety improvement, SDG&E continuously strives for a work environment where

Not all metrics adopted in D.19-04-020 and D.21-11-009 are applicable to SDG&E.

⁴ D.21-11-009 at Appendix B.

The Commission's Safety and Enforcement Division (SED) staff, via the S-MAP Technical Working Group, instructed the utilities to provide metric data in a native file format. Excel is not an accepted format for filing at the Commission, accordingly a PDF version of Attachment B will be filed and a native Excel version of Attachment B will be separately served on parties to the successor S-MAP proceeding R.20-07-013 and the most recent or current RAMP and GRC proceedings. SDG&E's initial report after the Risk OIR Phase One Decision, which updated the reportable Safety Performance Metrics, was submitted on July 29, 2022 (the 2021 SPMR Report). The CPUC Safety Policy Division (SPD) has not yet provided its review and recommendations on SDG&E's 2021 SPMR Report.

employees at all levels can raise concerns and offer suggestions for improvement on any safetyrelated topic including pipeline and electric infrastructure, and public, employee and contractor safety.

In 2020, SDG&E developed and began operating within a Company-wide Safety Management System (SMS) that encompasses both its gas and electric operations. The SMS is a systematic, enterprise-wide framework to manage and reduce risk and promote continuous improvement in safety performance through deliberate, routine, and intentional processes. The SMS framework ties together each of SDG&E's existing and future safety initiatives, aligns its core operating units, integrates risk and safety, and allows for risk to be assessed across the entire organization for continuous improvement and enhanced safety performance.

The SMS framework enhances SDG&E's safety-related programs and initiatives by providing:

- Greater communication, broad sharing of information, and utilization of lessons learned:
- Enhanced documentation in the form of standardized processes and widely accessible document and data repositories;
- Strengthened employee feedback mechanisms, additional means/resources for consistent follow-up and communication;
- Early identification of risks, integration of risk and asset management with operations;
- Strong Management of Change where employees and contractors have the knowledge and tools to anticipate, identify and assess risk and are empowered to communicate risks to drive change; and
- Continual learning and improvement with greater reliance on data and analytics, increased use of leading indicators with strong review processes to continually measure effectiveness.

SDG&E's SMS provides a standardized approach for managing risk and safety across all assets and operations by implementing standardized processes and risk assessment methodologies that can be consistently applied Company-wide. The SMS framework creates an integrated

approach and a Company-wide resource to guide actions, decisions, and behaviors to efficiently and effectively manage risk and continually improve upon all aspects of the Company's safety performance. SDG&E's SMS focuses on process safety, which broadly encompasses procedures, hazard analysis, training, equipment integrity, change management, incident investigation, emergency preparedness, and compliance. These factors and others may affect the likelihood and consequence of incidents and contribute to their identification and prevention.

SDG&E's framework for its SMS is summarized in Figure 1 below:

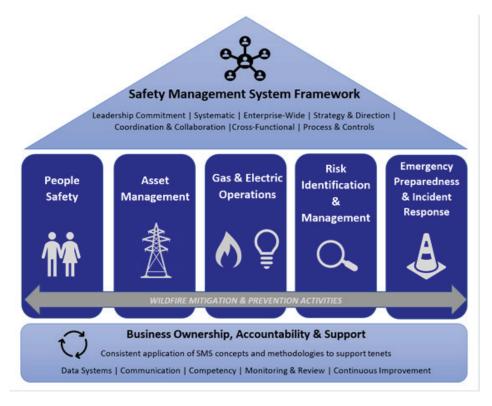


Figure 1: SDG&E SMS Framework

SDG&E's SMS Framework, established in 2020, includes the Five Pillars of Safety, to focus on both individual safety behaviors and process safety management. The Five Pillars of Safety are: (1) People Safety, (2) Asset Management, (3) Gas and Electric Operations, (4) Risk Identification and Management, and (5) Emergency Preparedness and Incident Response. These pillars are the core of an integrated, comprehensive, and risk-informed approach to managing safety under the SMS, in line with basic safety principles and a broader process safety management focus. Activities

to effectively manage the risks SDG&E faces, including wildfire mitigation and prevention activities, are integrated throughout the Five Pillars of Safety and the SMS Framework.

Each of SDG&E's safety efforts, processes, programs, and committees are aligned and integrated within SDG&E's Safety Management System framework. In 2022, SDG&E adopted its first Safety Management Action Plan with data-driven goals, objectives, and measurable metrics for continuous safety improvement. Progress towards the Safety Management Action Plan goals are regularly communicated and reviewed by management. Key leading and lagging safety indicators, including Near Miss Reports, safety observations, and Serious Injury and Fatality (SIF) potential assessments are continually reviewed to identify opportunities for improvement and develop additional goals. SDG&E has a consolidated safety dashboard, accessible to all employees, to monitor progress towards the Company's safety goals.

While SDG&E's adoption of an annual Safety Management Action Plan is relatively new, SDG&E has been tracking many leading and lagging safety-related metrics for numerous years. Therefore, there are some instances where the definition of the reportable Safety Performance Metric, as adopted by the S-MAP Phase Two Decision and Risk OIR Phase One Decision, may differ from previous external reporting requirements, or data required by the new or modified metric had not previously been collected. SDG&E notes these nuances within each metric narrative included in Section V, below. SDG&E will continue to track the Safety Performance Metrics adopted by the Commission and build upon the data in future Safety Performance Metric Report submissions where ten years of monthly historical data is not yet available, as well as continue to improve its data collection efforts.⁶

⁶

While the Safety Performance Metrics Report requires SDG&E to provide a historical look back of data, over time, the applicable law or the underlying metric definition may have changed. Such changes to the metric or law may have an impact on both the data collected and its comparability to prior metrics. Where a change has occurred, SDG&E will note the modification in succeeding Safety Performance Metric Reports.

A. Compliance with S-MAP Phase Two Decision and Risk OIR Phase One Decision Directives

The Risk OIR Phase One Decision updated the Safety Performance Metrics to be filed annually, and requires the IOUs to make an annual filing to be served in the IOU's respective General Rate Case (GRC) proceedings and any future S-MAP proceedings.⁷ The S-MAP Phase Two Decision remains instructive and includes additional reporting requirements for the IOUs to:

1) describe how metrics are used to improve risk-based decision-making, corrective actions and/or enhance training, and 2) explain whether any linkage to financial incentives creates a potential for bias in individual metrics. Sections II and III below provide additional detail on these requirements.

For the Public Serious Injuries and Fatalities (Pub-SIF) metric, Metric No. 20, the S-MAP Phase Two Decision requires the IOUs to provide Commission staff with their individual Pub-SIF metric data 60 days prior to the due date for each annual Safety Performance Metrics Report.⁸

Accordingly, SDG&E provided SPD with a preview of its Pub-SIF data on January 30, 2023. After submission and review of SDG&E's draft Pub-SIF data, SPD informed the IOUs on March 7, 2023, that there were no changes to the Pub-SIF subcategories for final reporting in this Safety Performance Metrics Report.

II. METRICS OVERVIEW (D.19-04-020, ORDERING PARAGRAPH 6D AND D.21-11-009)

A. Summary

The currently approved Safety Performance Metrics contain nine metrics in the "electric" category, twelve metrics in the "gas" category, eight metrics in the "injuries" category, and three metrics in the "vehicle" category. Of these 32 metrics, 28 are currently applicable to SDG&E and

In accordance with D.21-11-009, SDG&E is required to report on 29 metrics. However, metric number 12 – Natural Gas Storage Baseline Assessments Performed, while noted in Appendix B to D.21-11-009 as a required metric for SDG&E, does not apply since SDG&E does not have any natural gas storage facilities.

⁸ D.19-04-020 at 19.

included in this Report. In addition to data for the 28 metrics, included as Attachment B, SDG&E provides a narrative below in accordance with the additional reporting requirements established in D.19-04-020 and D.21-11-009.

Table 1- Summary of Applicable Metrics Adopted in D.19-04-020 and D.21-11-0099

Category	Risk(s)	Metric Name	Units	2022
Electric	Wildfire; Transmission Overhead Conductor; Distribution Overhead Conductor Primary	1. Transmission & Distribution (T&D) Overhead Wires Down ¹⁰	Number of wire down events	101
	Wildfire; Transmission Overhead Conductor; Distribution Overhead Conductor Primary	2. Transmission & Distribution (T&D) Overhead Wires Down - Major Event Days ¹¹	Number of wire down events	372
	Wildfire; Overhead Conductor; Public Safety; Worker	3. Electric Emergency Response	Average time in minutes	46.59
	Safety		Median time in minutes	33.09
	Overhead Conductor; Wildfire Public Safety; Worker Safety; Catastrophic Event Preparedness	4. Fire Ignitions	Number of ignitions	20
Gas	Transmission Pipeline Failure -	5. Gas Dig-in	The number of 3rd party	1.19

⁹ Category, Risks, Metric Names and Units as provided in D.19-04-020, Attachment 1 and D.21-11-009, Appendix B. Of the 32 reportable safety metrics adopted in D.19-04-020 and D.21-11-009, 29 are applicable to SDG&E and are included herein. Ten years of monthly historical data, where available, is provided in the accompanying Excel file labeled Attachment B.

Metric No. 1 excludes down distribution secondary wires and "Major Event Days" (typically due to severe storm events) as defined by the Institute of Electrical and Electronics Engineers (IEEE).

Metric No. 2 tracks the number of wire down events including secondary distribution wires and Major Event Days (whereas Metric No. 1 tracks only primary wire down events and excludes secondary wire and Major Event Days).

Category	Risk(s)	Metric Name	Units	2022
	Rupture with Ignition; Distribution Pipeline Rupture with Ignition (non- Cross Bore); Catastrophic Damage involving Gas Infrastructure (Dig-Ins)		gas dig-ins per 1,000 USA tags/tickets	
	Catastrophic Damage Involving High-Pressure Pipeline Failure	6. Gas In-Line Inspection	Total number of miles of inspections performed and percentage inspected by ILI ¹²	1 mile 0%
	Catastrophic Damage Involving High-Pressure Pipeline Failure	7. Gas In-Line Inspection Upgrade	Miles of gas transmission lines upgraded annually to permit inline inspections	0
	Distribution Pipeline Rupture with Ignition (non- Cross Bore)	8. Gas Shut-In Time – Mains	[Median]Ti me in minutes required to stop the flow for Distribution Mains	833.00
	Distribution Pipeline Rupture with Ignition (non- Cross Bore)	9. Gas Shut-In Time - Services	[Median]Ti me in minutes required to stop the flow for	98.08

-

Transmission pipelines in High Consequence Areas (HCAs) are required to be assessed at an interval not to exceed seven years and those in areas outside of HCAs (non-HCAs) are required to be assessed at an interval not to exceed ten years. Therefore, intervals may vary year-to-year over the seven-year or ten-year inspection cycle and data should be viewed across years rather than on a year-by-year basis. Ten years of historical data is included in the accompanying Excel file, Attachment B.

Category	Risk(s)	Metric Name	Units	2022
			Distribution	
			Services	
	Catastrophic	10. Cross Bore	Number of	
	Damage Involving	Intrusions ¹³	cross bore	
	Medium Pressure		intrusions	0
	Pipeline Failure		per 1,000	
			inspections	
	Distribution	11. Gas	The time in	
	Pipeline Rupture	Emergency	minutes	
	with Ignition	Response	[Average	
		Time	and Median]	
			that a Gas	
			Service	
			Representati	
			ve or a	
			qualified	28.60
			first	26.08
			responder takes to	
			respond after	
			receiving a call which	
			results in an	
			emergency order.	
	Catastrophic	13. Gas	[Miles]	
	Damage Involving	Pipelines That	Percentage	
	High-Pressure	Can Be	1 creemage	147
	Pipeline Failure	Internally		69%
	1 ipointe i unuic	Inspected ¹⁴		
	Employee Safety	14. Employee	DART	
		Days Away,	Cases times	
		Restricted and	200,000	
		Transfer	divided by	1.03
Injuries		(DART) Rate	employee	
J			hours	
			worked	
	Employee Safety	15. Rate of	Number of	0.04
		Serious	SIF-Actual	0.04

⁻

SDG&E completed all sewer lateral inspections by 2012; only one cross bore intrusion was found and repaired. Monthly data for 2012 is included in the accompanying Excel file, Attachment B.

This metric represents the percentage of the gas system that can be internally inspected, otherwise known as in-line inspection or "piggable." All of SDG&E's transmission pipeline is inspected in accordance with 49 Code of Federal Regulations (CFR) § 192, Subpart O, which identifies in-line inspection, pressure test, and direct assessment as acceptable methods of inspection.

Category	Risk(s)	Metric Name	Units	2022
		Injuries or Fatalities (SIF) Actual (Employee)	cases among employees x 200,000/em ployee hours worked	
	Contractor Safety	16. Rate of SIF Actual (Contractor)	Number of SIF-Actual cases among contractors x 200,000/con tractor hours worked	0.03
	Employee Safety	17. Rate of SIF Potential (Employee)	Number of SIF- Potential cases among employees x 200,000/em ployee hours worked	0.24
	Contractor Safety	18. Rate of SIF Potential (Contractor)	Number of SIF- Potential cases among contractors x 200,000/con tractor hours worked	0.30
		19. Contractor Days Away, Restricted Transfer (DART)	OSHA DART Rate	0.33
	Public Safety	20. Public Serious Injuries and Fatalities	Number of Serious Injuries and Fatalities	0/0
Vehicle	Aviation Safety Helicopter Operations Public Safety Worker Safety Employee Safety	21. Helicopter/ Flight Accident or Incident	Number of accidents or incidents (as defined in 49 CFR Section 830.5 "Immediate Notification") per	1

Category	Risk(s)	Metric Name	Units	2022
			100,000	
			flight hours	
Electric	Electric Overhead,	25. Wires-	Percentage	
	wildfire	Down not	of wires	15 000/
		resulting in	down	17.82%
		Automatic De-	occurrences	
		energization 26. Missed	Dargantaga	
		Inspections [I]	Percentage of structures	
		and Patrols [P]	that missed	
		for Electric	inspection	
		Circuits	relative to	T-I 0.00%
			total	D-I 0.00%
			required	T-P 0.00%
			structures	D-P 0.00%
			[Transmissi	
			on – T;	
			Distribution	
		27 0 1 1	– D]	
		27. Overhead Conductor	Percentage relative to	
			total circuit	
		Size in High Fire Threat	miles	7.90%
		District (Tiers	innes	7.5070
		2 and 3,		
		HFTD)		
Gas	Gas safety	28. Gas	Percentage	
		Operation	of work	
		Corrective	orders past	
		Actions	due for	
		Backlog	completion	0.00%
			in the past	0.00%
			calendar	
			year	
			[Transmissi on/Distributi	
			on	
Electric	Electric safety and	29. GO-95	Percentage	
	Wildfire	Corrective	of corrective	
		Actions (Tiers	actions	05 100/
		2 and 3,	completed	95.18% 99.60%
		HFTD)	[Transmissi	33. 0070
			on/Distributi	
			on]	
Gas	Gas Transmission	30. Gas	Number of	2 / 2
	and Distribution	Overpressure	occurrences	0/0
		Events		

Category	Risk(s)	Metric Name	Units	2022
			[Transmissi	
			on/Distributi	
			on]	
	Gas Transmission	31. Gas In-	Number of	
		Line	Missed	0
		Inspections	Inspections	U
		Missed		
Electric	Wildfire	32. Overhead	Number of	
	Transmission	Conductor	occurrences	
	Overhead	Safety Index	per circuit	
	Conductor		mile	$0.00/12.01^{15}$
	Distribution		[Transmissi	
	Overhead		on/Distributi	
	Conductor Primary		on]	

B. Examples of Efforts to Improve Safety Performance

A key objective of the Commission "in adopting S-MAP safety metrics is not just tracking but improving [the] utilities' safety performance."¹⁶ The S-MAP Phase Two Decision, therefore, requires the IOUs to provide examples of how data contained in this report is used to improve employee and/or contractor training and to take corrective actions aimed at minimizing top risks or risk drivers. SDG&E has been focused on safety metrics, taking corrective actions, and improving training courses throughout the Company's long history. SDG&E is proud to have a strong safety culture and is committed to developing processes and programs designed to manage employee, contractor, customer, and public safety risks.

As noted above, SDG&E operates within a Company-wide SMS, which provides a systematic, enterprise-wide framework to collectively manage and reduce risk and promote continuous improvement in safety culture and safety performance through deliberate, routine, and intentional processes. The SMS framework connects each of SDG&E's existing and future safety

Metric #1 data has been used as a proxy for this metric. For further information, see the narrative context discussion for Metric 32.

¹⁶ D.19-04-020 at 28.

initiatives, better aligns the core operating units, and allows SDG&E to assess risk across the entire enterprise for enhanced safety performance.

SDG&E's continuous improvement efforts begin with the continuous assessment of risks identified through the Enterprise Risk Management (ERM) and Asset Management processes. The observations and information captured through the ERM and Asset Management work are used to develop strategic risk mitigations. The mitigations are implemented through operating and functional units. The implementation status, results and lessons learned are then captured through on-going managerial oversight throughout all layers of management. The results of these oversight efforts are reviewed with the Executive Safety Council and SDG&E's leadership on a regular basis.

SDG&E management continually reviews results from a variety of safety leading and lagging key performance indicators and metrics, including injuries, motor vehicle accidents, nearmiss incidents, safety observations, and is actively involved in evaluating risk and developing necessary action plans. SDG&E has a healthy safety culture that encourages continuous improvement based on feedback from the front lines and findings from investigating incidents and near misses. Safety goals are set with continuous improvement in mind by focusing on increasing current goals and developing new leading indicators.

The Commission has stated that "[a]n effective safety culture is a prerequisite to a utility's positive safety performance record," and defines "safety culture" as follows:

An organization's culture is the collective set of that organization's values, principles, beliefs, and norms, which are manifested in the planning, behaviors, and actions of all individuals leading and associated with the organization, and where the effectiveness of the culture is judged and measured by the organization's performance and results in the world (reality). Various

Investigation (I.) 15-08-019, Order Instituting Investigation on the Commission's Own Motion to Determine Whether Pacific Gas and Electric Company and PG&E Corporation's Organizational Culture and Governance Prioritize Safety (August 27, 2015) at 4.

governmental studies and federal agencies rely on this definition of organizational culture to define 'safety culture.' 18

The Commission has further stated that, under the above definition, a positive safety culture includes a "[a] clearly articulated set of principles and values with a clear expectation of full compliance," and "[e]ffective communication and continuous education and testing." SDG&E fully agrees and has developed values, goals, and practices for a safety culture by advancing its programs, policies, procedures, guidelines, and best practices to improve the safety of its operations. As such, SDG&E created an enterprise-wide SMS to drive continuous improvement in both its electric and gas operations. Below are three examples of SDG&E's recent efforts to continually improve its training programs and deploy enhancements to continually improve safety, as directed by the S-MAP Phase Two Decision:

Example 1: Implementation of a Supervisor Training Academy (Metrics #14 - #20)

In 2022, SDG&E launched a company-wide Supervisor Training Academy for frontline leaders, focusing on safety, supervisor effectiveness, diversity and inclusion, compliance, employee engagement and culture. Based on the important role supervisors play in shaping our employees' work lives and our efforts to continually advance psychological safety across the workforce, SDG&E implemented a new development program that reflects the latest leadership trends and focuses on mentoring and developing team members.

The Supervisor Training Academy is comprised of three full-day training sessions spread four months apart. SDG&E will evaluate the program effectiveness leveraging SDG&E's "Metrics

I.19-06-014, Order Instituting Investigation on the Commission's Own Motion to Determine Whether Southern California Gas Company's and Sempra Energy's Organizational Culture and Governance Prioritize Safety (June 27, 2019) at 3 (citation omitted).

¹⁹ *Id*.

See, e.g., A.17-10-007/-008 (cons.), Application of San Diego Gas & Electric Company for Authority, Among Other Things, to Update its Electric and Gas Revenue Requirement and Base Rates Effective on January 1, 2019 (October 6, 2017) [Proceedings A.17-10-007 and A.17-10-008 are consolidated by Ruling of November 8, 2017], Ex. 03 (SCG-02-R/SDGE-02-R Day Direct) at DD-28.

that Matter" data analysis and benchmarking feedback platform, which helps measure learning and development programs through various evaluation methods to help improve employee performance. SDG&E will also evaluate training programs through metrics obtained during our upcoming 2023 Employee Engagement survey. In addition, we will seek and incorporate qualitative data from inline leadership.

Additionally, in March 2022, all executives, directors and over 40 managers completed a 14-month Leadership and Business Academy that focused on similar topics to the Supervisor Training Academy. In Q1 2022, SDG&E also offered a webinar to its executives, directors and managers on effectively managing a hybrid workforce, which included safety, wellbeing, and culture topics.

Lastly, in 2022, SDG&E's supervisors, managers, and executives completed a series of mandatory Psychological Safety training courses.

Example 2: Enhanced Contractor Safety Incident Reporting and Data Analytics System (Metrics #16, #18, and #19)

On April 1, 2022, SDG&E's Contractor Safety Services team launched a new app-based incident reporting system. This system streamlines reporting, tracking, follow-up, and communication of reported incidents and events. Per SDG&E's Class 1 Contractor Safety Manual, Contractors must immediately report to the SDG&E Representative any project—related incidents or events, including Good Catch or Near Miss events. SDG&E defines "Good Catch" as a recognition of a condition or situation that had the potential to cause an incident but did not cause one due to corrective action and/or timely intervention. Information submitted in the incident reporting system is used to identify corrective actions, lessons learned and opportunities for continuous safety improvement. Information is uploaded and tracked in SDG&E's Contractor Safety Dashboard and continually reviewed and assessed.

SDG&E Contractor Safety Manual, Class 1 Contractors (Version 2022.1) at 6, available at https://www.sdge.com/contractor-safety-program-resources.

SDG&E's Contractor Safety Services team publishes a monthly newsletter, "Contractor Safety Talks," distributed to internal and external stakeholders. This newsletter highlights Best Management Practices (BMPs), key takeaways from performed jobsite inspections and observations, and submitted incidents. Additionally, Incident Alerts are issued in order to raise awareness and mitigate the potential for similar events.

Example 3: Extended Reality Factory Training (Metrics #4, #14 - #20)

SDG&E's Extended Reality (XR) Factory training was created to leverage immersive experience technology to assist field worker training. XR technologies include virtual, augmented, and assisted reality. These technologies work together to build a space for safe, adaptive, and flexible training. The XR Factory team works with instructors and subject matter experts to develop and deliver training focused on experience, workforce talent, and safety. XR training helps accelerate a field worker's learning in the classroom by connecting muscle to memory – before even stepping out into the field. It targets hard or soft skill development with personalized experiences. It inspires innovation with virtual collaboration.

XR Factory promotes early risk identification and continuous safety improvement. SDG&E piloted this new XR training module at its Skills Training Center, focusing on the company's highest risk – wildfire safety. This training allows workers to train for high consequence, low frequency events and experience in a virtual reality setting to allow for deeper learning. XR training also allows for deeper data analytic capabilities (vs. a pass/fail score of an online training module) to provide opportunities for continuous safety improvement.

C. Examples of How Safety Performance Metrics Data is Used to Support Risk-Based Decision-Making

Safety is a core value and a foremost consideration at SDG&E. Safety is a major factor in any operational decision. The S-MAP Phase Two Decision requires each IOU to summarize and

provide three to five examples of how it is using Safety Performance Metrics Report data to support risk-based decision making.

Example 1: Collaborative efforts to create a non-conductive foil balloon (Metric #4)

Each year, electrically conductive foil balloons – popular for celebrating birthdays, graduations and other special occasions – cause thousands of power outages across California and the nation when they get tangled up in power lines. Occasionally, foil balloons caught in power lines also spark fires and bring down electrical wires. This happens because the metallic exterior of the foil balloon conducts electricity, so when it floats into an overhead power line the balloon can cause an electrical fault, blackouts, or sparks that can start fires.

Elsewhere in California, Pacific Gas & Electric Company (PG&E) and Southern California Edison Company (SCE) report that metallic balloons caused that drifted into its power lines caused more than 600 outages in 2021, a 27% increase from the previous year and the highest number of balloon-related outages the company has seen in a decade. In 2021, SCE recorded 1,103 outages caused by metallic balloons that impacted 1.6 million customers for 7,630 hours. Metallic balloons also pose a danger to linemen who respond to the incidents and work to safely remove the balloons. To address this issue, SDG&E worked collaboratively to develop an alternative product. SDG&E partnered with Anagram, a leading balloon manufacturer owned by Party City, to create and test a non-conductive foil balloon prototype. The new balloon was successfully tested over several years in conditions common to California's electrical distribution systems. SDG&E also

PG&E Currents, PG&E to Customers: Stay Safe, Secure Valentine's Day Balloons With a Weight (February 14, 2022), available at https://www.pgecurrents.com/articles/3393-pg-e-customers-stay-safe-secure-valentine-s-day-balloons-weight.

Edison International, Love Might Be in the Air but Metallic Balloons Shouldn't Be (February 9, 2022) available at https://energized.edison.com/stories/love-might-be-in-the-air-but-metallic-balloons-shouldnt-be.

served as Chair on an Institute of Electrical and Electronics Engineers (IEEE) committee focused on creating a standard for testing non-conductive foil balloons.

Assembly Bill 847 was signed by the Governor on September 18, 2022. Under the new bill, anyone who makes any foil balloon for sale must ensure that those balloons meet certain requirements. To help reduce fire risk and prevent power outages, manufacturers and retail outlets in California will be required to gradually phase in the production and sale of non-electrically conductive foil balloons in the coming years after the IEEE approves the final standard.

Example 2: Investment Portfolio Optimization (IPO) Tool Development (Metric #1, #2, #4, and #32)

The Commission's S-MAP and Risk OIR Phase One decisions necessitate the ability to forecast, track, and report on, among other items, units and costs associated with risk activities that drive SDG&E's risk-informed decision-making process. SDG&E's existing investment prioritization tool lacks the capability to meet the more rigorous and complex regulatory reporting requirements mandated by these decisions. To address these analytical and reporting needs, SDG&E commenced an IPO program, which includes the development and implementation of the Copperleaf Portfolio Tool. This tool was placed into service for electric transmission, substation, system protection and distribution operating units in 2022. SDG&E is currently expanding its implementation of this tool as a "Software as a Service" (SaaS) solution for Gas Transmission, Gas Distribution, IT, Generation and Facilities.

Replacing the current tool with the Copperleaf Portfolio will provide data-driven, risk informed, transparent, and consistent capital investment optimization and prioritization while also supporting wildfire-driven projects and Wildfire Mitigation Plan reporting requirements. The software solution also enables the simplification and standardization of project appraisals, based on risk reduction benefits and costs.

Example 3: Asset 360 (Metric Nos. 1, 2, and 4)

SDG&E's Asset Management division is utilizing a data-based approach to improve risk-informed decision making. Through the Asset 360 program, a per-asset health score is created for critical assets to better assess an asset's performance, health, and the impact when assets fail. These asset health and impact models are used to mitigate occurrences of events captured by the Safety Performance Metrics by way of proactive replacement of assets. In addition, Asset 360 will continue to improve existing models for critical assets as well as incorporate new assets into the platform.

As an example of how the Asset 360 tool is used, a per asset risk score has been developed and used to select the scope for risk-informed unmanned aerial inspections in SDG&E's high fire threat districts (HFTD) and wildland urban interface (WUI) areas.

SDG&E is planning to further refine this asset-level risk prioritization tool to develop a more risk-informed approach to other types of asset inspections, such as wood pole intrusive inspections, infrared electric distribution inspections, and electric distribution patrols. The use of the risk prioritization tool to better inform the scheduling of repairs will be investigated, while maintaining compliance with General Order (GO) 95, Rule 18.B.

III. EXECUTIVE COMPENSATION AND BIAS CONTROLS – OVERVIEW (D.19-04-020, ORDERING PARAGRAPH 6.A - C)

A. Executive Incentive Compensation

SDG&E's strong safety culture is demonstrated by using compensation metrics and key performance indicators to drive improved safety performance. As the Commission stated in D.16-06-054, "[o]ne of the leading indicators of a safety culture is whether the governance of a company utilizes any compensation, benefits or incentive to promote safety and hold employees

accountable for the company's safety record."²⁴ Benefits programs that promote employee health and welfare also contribute to SDG&E's safety performance and culture.

In her Test Year (TY) 2024 GRC testimony, Compensation and Benefits witness Debbie Robinson explained how SDG&E's compensation and benefits programs are designed to focus employees on safety and that SDG&E continues to emphasize employee and operational safety measures in their variable pay plans, commonly referred to as the Incentive Compensation Plans (ICP).²⁵ Providing continued alignment between SDG&E's safety programs and the ICP helps to strengthen the Company's safety culture and signal to employees that safety is a core value of SDG&E..

The S-MAP Phase Two Decision directs the IOUs to identify all metrics linked to or used in any way to determine executive compensation levels and/or incentives. ²⁶ In the narrative for each Safety Performance Metric reported herein, SDG&E indicates whether that specific metric is linked to determining executive compensation levels and/or incentives (*See* Section V, below). For this 2022 Safety Performance Metrics Report, SDG&E references its 2022 Executive ICP and 2022 non-executive ICP and indicates whether each metric was tied to these ICPs in 2022. Since this is an annual submission, SDG&E intends to reference the reporting year's ICP (*i.e.*, next year's submission will reference the 2023 ICPs) as these plans are reviewed and may change annually.

SDG&E's executive compensation structure is intended to focus executives on SDG&E's key priorities, the most important of which is safety. Safety is one of SDG&E's core values, and thus compensation metrics and key performance indicators are used to drive improved safety performance, as discussed below.

²⁴ D.16-06-054 at 153.

²⁵ A.22-05-015/016 (cons.), Ex. SCG-25-R/SDG&E-29-R Robinson Direct at DSR-11.

²⁶ D.19-04-020, Ordering Paragraph 6.A at 63.

The primary components of SDG&E's executive officer compensation are Base Pay,

Variable Pay (*i.e.*, ICP), and long-term incentives under Sempra Energy's (Sempra) Long-term

Incentive Plan. Variable Pay is considered an essential component of a competitive total

compensation package because it creates focus on and accountability for desired results, improves

performance, and facilitates idea generation and operational improvements. Under SDG&E's

Variable Pay plan, a portion of employee total cash compensation is placed at risk. The Variable

Pay plan – at threshold, target, and maximum company performance – is expressed as a percentage

of each executive officer's base salary. SDG&E has maintained the weighting of safety measures in

variable pay plans over the past years, such that safety-related measures comprise 60% of SDG&E's

2022 Executive Incentive Compensation Plan. Performance measures are reviewed and updated

annually.

Assembly Bill 1054 (2019) added Section 8389(e)(4) and Section 8389(e)(6) to the Public Utilities Code. These provisions concern an electrical corporation's executive incentive compensation structure and principles of executive compensation, respectively. An electrical corporation's demonstration of compliance with these statutory provisions is among the requirements necessary for obtaining an annual safety certification.

SDG&E's executive incentive compensation structure complies with Public Utilities Code § 8389(e)(4), which requires that the structure "promote safety as a priority and to ensure public safety and utility financial stability with performance metrics, including incentive compensation based on meeting performance metrics that are measurable and enforceable, for all executive officers, as defined in Section 451.5."²⁷ The SDG&E compensation component that comprises

California Public Utilities Code Section 451.5(c) defines "executive officer" as "any person who performs policy making functions and is employed by the public utility subject to the approval of the board of directors, and includes the president, secretary, treasurer, and any vice president in charge of a principal business unit, division, or function of the public utility."

"executive incentive compensation" is Variable Pay. Safety measures or goals are an important focus of the SDG&E's Variable Pay, as reflected in the performance goals included within the "Employee & Public Safety Operations" category of SDG&E's 2022 Executive and non-executive Incentive Compensation Plans. These measures, as further described in each applicable metric in Section V below, are designed to incent employees and executives to meet specified safety targets. Safety measures in Variable Pay Plans apply to all non-represented employees. The ICP targets for goals within the Employee & Public Safety Operations category are the same for every non-represented employee, regardless of their role in the company.

SDG&E's Board of Directors determines the safety performance measures and targets to be included in each year's ICP and approves the results. The Board meets on at least a quarterly basis, where meetings begin with a safety briefing and include a regular review of year-to-date safety performance as well as current safety and risk-related topics. As a part of their oversight roles, the Board may exercise discretion to reduce or eliminate payout for safety measures in the event of a serious incident.

Safety is a core value and a top priority for SDG&E, and the weighting of the safety measures in the 2022 Executive ICP reflects this value and priority. There are no guaranteed monetary incentives in SDG&E's Executive ICP. In years performance goals (including safety goals) are not met, Variable Pay is reduced or not paid.

B. Bias Controls

Regularly scheduled internal audits are performed by Sempra Audit Services. Audit Services provides an independent internal audit function, with the Vice President of Audit Services functionally reporting to the Sempra Board of Directors through its Audit Committee, and administratively to Sempra's Executive Vice President and Chief Financial Officer. Audit Services develops an audit plan each year after consultation with SDG&E management to identify and assess

risks to the business. Audit Services then implements its plan by independently reviewing and evaluating the business controls in place. Audit Services has full access to all levels of SDG&E management, and to all organizational activities, records, property and personnel relevant to activities under review. Audit Services is authorized to select activities for audit, allocate resources, determine audit scope and apply techniques required to accomplish audit objectives. Audit Services is further authorized to obtain other specialized services from within or outside the organization.

The scope of work conducted by Audit Services includes ascertaining whether SDG&E's processes and business controls, as designed and maintained by SDG&E management, are adequate and functioning in a manner to help ensure compliance with policies, plans, procedures, laws, regulations and contracts, safeguarding of assets, effectiveness and efficiency of operations, and reliability and integrity of operating and financial information. Strong business controls increase the likelihood of achieving these important objectives. SDG&E management is responsible for taking ownership of, and being accountable for, understanding, establishing, and maintaining effective business controls. Through its independent audit function, Audit Services identifies whether appropriate business controls are in place and evaluates whether they are designed and functioning properly. These collective efforts provide a basis for Audit Services to provide an independent evaluation to SDG&E management and the Board of Directors as to the adequacy of the Company's overall system of business control. SDG&E management will address identified deficiencies by Audit Services and develop management corrective actions to resolve the findings. Management corrective actions are assigned a completion date and must be addressed prior to Audit Services closing the audit.

The S-MAP Phase Two Decision directs the IOUs to "[d]escribe the bias controls that the utility has in place to ensure that reporting of the metric(s) has not been gamed or skewed to support

a financial incentive goal."²⁸ SDG&E's 2022 Executive ICP and 2022 non-executive ICP each include thirteen separate safety-related performance measures.²⁹ These safety-related performance measures comprise a mixture of leading and lagging measures and span all lines of business – fire and public safety, gas safety, and electric safety - in order to prevent bias. Bias controls for specific metrics included in this Safety Performance Metrics Report possessing an ICP component are discussed in each metric section below. However, SDG&E's inclusion of thirteen separate safety-related performance metrics within the ICP, generally serves as its own control because achievement of a metric, according to a preestablished definition subject to internal audit, is required for any payment for that metric to occur.

At the request of management, Sempra's Audit Services department conducts an independent review of SDG&E's annual ICP results and calculations prior to SDG&E Board approval, which includes examining whether financial and operational goal results included in the ICP calculations are approved by the responsible officer and supported with documentation. Each safety-related performance metric is well defined in the approved annual ICP plan. SDG&E's annual ICP plans further specify how each metric is tracked.

IV. INTERIM RISK MITIGATION ACCOUNTABILITY REPORT (RMAR) REQUIREMENTS (D.19-04-020, ORDERING PARAGRAPHS 6E – 6F)

A. How Safety Metrics Reflect Progress Against SDG&E's RAMP and GRC Safety Goals

SDG&E's Test Year (TY) 2019 GRC testimony outlined the Company's goals for future risk management and safety initiatives and presented a vision to integrate risk, asset, and investment

²⁸ D.19-04-020, Ordering Paragraph 6.C. at 63.

For the period of January 1, 2022 to December 31, 2022, SDG&E had in place a "2022 Executive Incentive Compensation Plan" and a "2022 Incentive Compensation Plan." The S-MAP Phase Two Decision defines "executive" as "director or above." SDG&E directors are covered by SDG&E's 2022 Incentive Compensation Plan (*i.e.*, the 2022 non-executive Incentive Compensation Plan). Therefore, SDG&E refers to both the 2022 Executive Incentive Compensation Plan and the 2022 Incentive Compensation Plan" herein.

management activities over future GRC cycles.³⁰ As described in SDG&E's TY 2024 GRC testimony,³¹ SDG&E began operating within a SMS in 2020, which advances these goals by integrating and aligning safety management, risk management, and asset management across the entire Company within a single framework. Within the SMS framework, SDG&E manages risk through a structured, increasingly data-driven approach that identifies threats and hazards, assesses and prioritizes risks, implements mitigation efforts, and engages in assessments and reviews to understand risk mitigation effectiveness. SDG&E's efforts to advance risk-informed decision making include analyzing enterprise risks to compile an Enterprise Risk Registry; working with operating groups to create their respective Operating Unit Risk Registry; leading various risk discussions to capture new and emerging risks; creating compliance trainings; and analyzing compliance policies.

SDG&E continues to advance its Asset Management Program, which is dedicated to the safety and optimization of existing utility assets to enhance operational excellence and minimize utility risks. In collaboration with key operating groups, the Asset Management team develops, implements, and enables strategies and solutions in the areas of regulatory compliance, business technology, data management and analysis, and integrated asset management in support of the safe, clean, and reliable delivery of energy to SDG&E customers. The SMS framework closely integrates asset management with safety management and risk management to identify, analyze, evaluate, and prioritize operating and enterprise level risks across the Company. As described in Section II.C, above, SDG&E's Asset Management team utilizes the Asset360 and Copperleaf tools to support operating groups with capital investment decision-making to enable SDG&E to prioritize and optimize its capital investment portfolio in a risk-informed manner. To facilitate the decision-

³⁰ A.17-10-007/-008 (cons.), Ex. 03 (SCG-02-R/SDGE-02-R Day Direct) at DD-25 – DD-26, Figure DD-4.

³¹ A.22-05-015/-006 (cons.), Ex. SDG&E-31 at KJD-7.

making process, the Asset Management Program provides operating groups centralized asset data, analytics, and technology solutions to assist in the assessment and development of projects and programs that mitigate identified risk(s).

The risk mitigation efforts identified within SDG&E's RAMP and GRC filings align with and support the Company's overarching goal of "Target Zero." Target Zero represents SDG&E's journey towards an incident free workplace with zero employee, contractor or public safety incidents. SDG&E captures numerous safety metrics, with increased focus on leading safety culture and safety performance indicators. These key performance and asset health indicators, together with the data collected and assessed as part of SDG&E's Wildfire Mitigation Plan, support the Company's risk-based decision-making. SDG&E's safety metrics that reflect progress and continuous improvement towards SDG&E's goal of Target Zero include:

- Rate of Serious Injury or Fatality (SIF) potential Employee (Metric #17):
 SDG&E's SIF Prevention Initiative involves an ongoing process of assessing and evaluating injury, illness, motor vehicle and near miss cases for SIF potential.
 Implemented in 2021, SDG&E's Serious Injury and Fatality Exposure Assessment Program provides SDG&E with the necessary tools to measure SIF exposure, understand the Company's specific SIF precursors, and design effective steps to mitigate SIF exposure in order to advance its goal of Target Zero.
- Rate of SIF potential Contractor (Metric #18): Implemented in 2021, SDG&E's SIF Exposure Assessment Program provides SDG&E with the necessary tools to measure SIF exposure, understand the Company's Class 1 Contractors specific SIF precursors, and design effective steps to mitigate SIF exposure in order to advance its goal of Target Zero.

- Public SIF (Metric #20): Public safety is a core value at SDG&E. SDG&E's safety-first culture is embedded in every aspect of the Company's work. SDG&E conducts public awareness efforts to enhance the safety of its customers and the general public. SDG&E achieved Target Zero with no public SIF incidents in 2022.
- Gas Dig-in (Metric #5): SDG&E continually promotes safe digging practices
 through public awareness and stakeholder engagement. Since 2018, SDG&E has
 demonstrated continued year-over-year improvement in the number of third-party
 gas dig-ins per 1,000 USA tags/tickets.
- B. High-level Summary of SDG&E's Total Estimated Risk Mitigation Spending Level as Approved in the TY 2019 GRC

D.14-12-025 required the IOU's Risk Mitigation Accountability Report (RMAR) and Risk Spending Accountability Report (RSAR) to together explain how IOU risk mitigation activities and spending are meeting the goals for managing and minimizing the risks identified in the utility's RAMP and GRC submissions.³² D.19-04-020 found that it was "premature to approve specific RMAR requirements or to require separate, more general RMARs at this time,"³³ and instead adopted interim RMAR requirements to be included in this Safety Performance Metrics Report. "In the interim, we direct the IOUs to include in their annual Safety Performance Metrics Reports some of the information originally envisioned as belonging in the RMARs."³⁴

SDG&E filed its TY 2019 GRC Application on October 6, 2017.³⁵ Among other things, SDG&E's GRC Application included requests related to mitigating their key safety risks and

³² D.14-12-025 at 3.

³³ D.19-04-020 at 32.

³⁴ *Id*.

A.17-10-007, Application of San Diego Gas & Electric Company (U902M) for Authority, Among Other Things, to Update its Electric and Gas Revenue Requirement and Base Rates Effective on January 1, 2019 (October 6, 2017).

integrated the results from the Company's RAMP filed on November 30, 2016 (2016 RAMP).³⁶ SDG&E's 2016 RAMP filing significantly informed the TY 2019 General Rate Case results.³⁷ The below tables provide a high-level summary of SDG&E's total estimated risk mitigation spending as presented in the 2016 RAMP filing and approved in the TY 2019 GRC.

The TY 2019 GRC Decision did not explicitly authorize RAMP activities differently from non-RAMP activities. Instead, the TY 2019 GRC Decision assessed and authorized funding for SDG&E in many instances based on "standard GRC methods, such as the quality of the forecast, counterarguments by intervenors, and whether a given showing met the burden of proof." For purposes of TY 2019 GRC authorized amounts (based on SDG&E's 2016 RAMP submission), SDG&E had to impute authorized amounts for some RAMP mitigation activities. Similarly, SDG&E does not necessarily track costs by RAMP mitigation activity or risk. Rather, SDG&E records costs to operations and maintenance (O&M) cost centers and to various capital budget codes, aligned with their GRC presentations. Since SDG&E's 2016 RAMP and TY 2019 GRC applications were filed, a more quantitative risk methodology and framework for RAMP and GRC filings was approved by the Commission in D.18-12-014. Based on the foregoing, these 2022 figures reflect a transitional time period in presenting the above-noted Commission directives. ³⁹

The TY 2019 GRC Decision was approved by the Commission on September 26, 2019.⁴⁰ The TY 2019 GRC Decision states "[t]he adopted revenue requirement and PTY increases for

I.16-10-015, Risk Assessment and Mitigation Phase Report of San Diego Gas & Electric Company and Southern California Gas Company (November 30, 2016).

Pursuant to D.20-01-002, Appendix B at B-1, SDG&E filed its RAMP application on May 17, 2021, informing its TY 2024 GRC, which was filed on May 16, 2022.

³⁸ D.19-09-051 at 22.

A Decision in the TY 2024 GRC is anticipated by year-end 2023. Safety Performance Metrics Reports filed after the GRC Decision will reflect SDG&E's total estimated risk mitigation spending as presented in the approved TY 2024 GRC and applicable RAMP filings.

⁴⁰ D.19-09-051.

SDG&E will provide the necessary funds to allow it to operate its electric and natural gas transmission and distribution system safely and reliably and to fulfill customer service functions at reasonable rates."⁴¹ Further, while SDG&E endeavored to "isolate the RAMP activity, to allow the reader to see the dollar request in GRC workpapers,"⁴² the TY 2019 GRC Decision stated that the "RAMP portion in Applicants' requests is not presented as separate and distinct from the non-RAMP portions" and "in many instances our decision is not based on risk mitigation but rather on standard GRC methods."⁴³

D.19-04-020 directs "the IOUs to include an explanation of how the reported safety metric data reflects progress against the safety goals in the utility's RAMP and approved GRC application and a high-level summary of their total estimated risk mitigation spending level as approved in their most recent GRC."⁴⁴ SDG&E includes this data in the tables below. Please refer to SDG&E's 2022 Risk Spending Accountability Report for additional detail on spending activities presented in SDG&E's 2016 RAMP Report and TY 2019 GRC proceeding.⁴⁵

Table 2 - SDG&E Interim RMAR Summary: O&M

SDG&E O&M Details (2022 Direct \$000)						
RAMP Chapter RAMP Risk Description 2022 Imputed \$ % Chapter RAMP Risk Description Actuals Authorized Variance Variance						
SDG&E-01	Wildfires Caused by SDG&E Equipment (Including Third Party Pole Attachments)	81,475	42,834	38,641	90%	
SDG&E-02	Catastrophic Damage Involving Third Party Dig-Ins	7,949	4,855	3,094	64%	

⁴¹ *Id.* at 3.

⁴² A.17-10-007/-008 (cons.), Ex. 03, (SCG-02-R/SDG&E-02-R, York Direct) at JKY-6.

⁴³ D.19-09-051 at 22.

⁴⁴ D.19-04-020 at 32.

⁴⁵ Per D.22-10-002 at 8, the IOU RSAR filing date was extended to April 30 of each year. As a result, the authorized and recorded O&M spending activities for SDG&E's 2022 RSAR are preliminary and may change as the costs are finalized in the 2022 RSAR.

SDG&E O&M Details (2022 Direct \$000)					
RAMP Chapter	2022 RAMP Risk Description Actuals		2022 Imputed Authorized	\$ Variance	% Variance
SDG&E-03	Employee, Contractor, and Public Safety	65,826	54,519	11,308	21%
SDG&E-04	Distributed Energy Resources – Safety and Operational Concerns	95	86	9	11%
SDG&E-06	Fail to Blackstart	5	47	(42)	-90%
SDG&E-07	Cyber Security	13,021	8,815	4,207	48%
SDG&E-08	Aviation Incident	496	472	24	5%
SDG&E-09	Workplace Violence	4,494	5,476	(982)	-18%
SDG&E-10	Catastrophic Damage Involving High- Pressure Gas Pipeline Failure	10,255	5,950	4,306	72%
SDG&E-11	Unmanned Aircraft System Incident	802	187	616	330%
SDG&E-12	Electric Infrastructure Integrity	7,615	22,867	(15,253)	-67%
SDG&E-13	Records Management	7,235	9,856	(2,621)	-27%
SDG&E-14	Climate Change Adaptation		463	(463)	-100%
SDG&E-16	Catastrophic Damage Involving Medium- Pressure Gas Pipeline Failure	12,211	17,164	(4,953)	-29%
SDG&E-17	Workforce Planning	2,830	2,520	310	12%
New	Emergent RAMP ⁴⁶	91,538	-	91,538	100%
	Total SDG&E RAMP	305,848	176,111	129,737	74%

SDG&E's 2016 RAMP Report forecasted RAMP activities for the years 2017 through 2019.

SDG&E's TY 2019 GRC presented capital forecasts for the GRC cycle (i.e., 2019-2021).⁴⁷

_

Emergent RAMP includes RAMP mitigation activities that were not identified in the TY 2019 GRC but have been newly identified as RAMP in the TY 2024 GRC.

D.20-01-002 at 52, extended the GRC cycle for each large California IOU from three to four years. To facilitate the transition from a three to four-year GRC cycle, the Rate Case Plan Decision "direct[s]... SDG&E to request two additional attrition years (2022 and 2023) in their petition for modification of D.19-09-051." D.21-05-003, Decision Regarding San Diego Gas and Electric Company's and Southern California Gas Company's Post Test Year Mechanism For 2022 And 2023 was approved effective May 6, 2021.

SDG&E manages its capital projects over the cycle, rather than on a year-by-year basis. Further, as the Rate Case Plan Decision states: "The Commission has always acknowledged that utilities may need to reprioritize spending between GRCs. Now, given the evolving reality [of moving to a four-year GRC cycle], that necessity may even be growing." Reprioritizing spending allows utilities to "[r]espond to immediate or short-term crises outside of the RAMP and GRC process," in accordance with Commission directive. As the Commission has stated: "RAMP and GRCs... are not designed to addresses immediate needs; the utilities have responsibility for addressing safety regardless of the GRC cycle." With the September 2019 TY 2019 GRC Decision, SDG&E began executing on new and/or incremental programs presented during the TY 2019 GRC proceeding (and emergent activities that were not identified in the TY 2019 GRC).

Table 3 - SDG&E Interim RMAR Summary: Capital

SDG&E Capital Details (2022 Direct \$000)						
RAMP Chapter	RAMP Risk Description	2022 Actuals	2022 Imputed Authorized	\$ Variance	% Variance	
SDG&E-01	Wildfires Caused by SDG&E Equipment (Including Third Party Pole Attachments)	161,966	94,817	67,149	71%	
SDG&E-02	Catastrophic Damage Involving Third Party Dig-Ins	3	322	(319)	-99%	
SDG&E-03	Employee, Contractor, and Public Safety	13,396	13,542	(147)	-1%	
SDG&E-04	Distributed Energy Resources – Safety and Operational Concerns	93	247	(154)	-62%	
SDG&E-05	Major Disturbance to Electrical Service (e.g., Blackout)	-	1,771	(1,771)	-100%	
SDG&E-06	Fail to Blackstart	-	2,101	(2,101)	-100%	
SDG&E-07	Cybersecurity	5,762	3,298	2,464	75%	
SDG&E-08	Aviation Incident	-	2,023	(2,023)	-100%	

⁴⁸ D.20-01-002 at 38.

⁴⁹ D.18-04-016 at 6 n.7 (citing D.16-08-018 at 152).

⁵⁰ D.16-08-018 at 152.

SDG&E Capital Details (2022 Direct \$000)						
RAMP Chapter	RAMP Risk Description	2022 Actuals	2022 Imputed Authorized	\$ Variance	% Variance	
SDG&E-09	Workplace Violence	3,142	4,280	(1,138)	-27%	
SDG&E-10	Catastrophic Damage Involving High- Pressure Gas Pipeline Failure	26,939	10,733	16,206	151%	
SDG&E-12	Electric Infrastructure Integrity	114,897	112,558	2,339	2%	
SDG&E-13	Records Management	4,757	12,963	(8,206)	-63%	
SDG&E-16	Catastrophic Damage Involving Medium- Pressure Gas Pipeline Failure	127,966	45,966	81,999	178%	
New	Emergent RAMP ⁵¹	284,836	16,812	268,024	1594%	
	Total SDG&E RAMP	743,756	321,435	422,322	131%	

As stated above, please refer to SDG&E's 2022 Risk Spending Accountability Report for additional detail on activities presented in SDG&E's 2016 RAMP Report and TY 2019 GRC proceeding, including variance explanations for those activities/programs that meet the CPUC's variance criteria threshold.

V. APPROVED SAFETY PERFORMANCE METRICS (D.19-04-020, ORDERING PARAGRAPH 2 AND D.21-11-009)

Each of the currently applicable and reportable safety performance metrics, as defined and adopted in the S-MAP Phase Two Decision and the Risk OIR Phase One Decision, are individually discussed below.⁵² Each section provides a brief narrative to provide context to the data and a high-level summary. Ten years of monthly historical data, where available, is separately provided in Excel format in Attachment B. If the full ten years of monthly historical data is not included for

Emergent RAMP includes RAMP mitigation activities that were not identified in the TY 2019 GRC but have been newly identified as RAMP in the TY 2024 GRC.

As discussed *supra* at 1, SDG&E was directed in the Risk OIR Phase One Decision to adhere to the S-MAP Phase Two Decision to the extent the metrics promulgated by that Decision were not revised, superseded, or expanded by the directives contained in the Risk OIR Phase One Decision.

any given metric, SDG&E provides an explanation and is collecting such data on a prospective basis for inclusion in future Safety Performance Metrics Reports.⁵³

A. Metric No. 1: Transmission & Distribution (T&D) Overhead Wires Down Non-Major Event Days

Metric Name and Description per D.21-11-009:⁵⁴ "Transmission & Distribution (T&D) Overhead Wires Down - Non-Major Event Days. Number of instances where an electric transmission or primary distribution conductor is broken or remains intact and falls from its intended position to rest on the ground or a foreign object; excludes down secondary distribution wires and "Major Event Days' (typically due to severe storm events) as defined by the [Institute of Electrical and Electronics Engineers] IEEE."

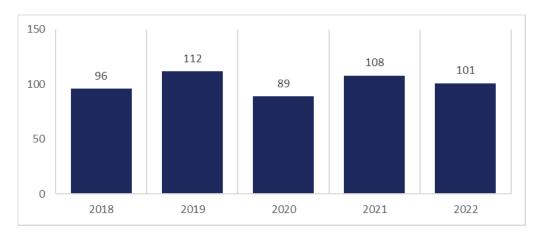
Risks: Wildfire; Transmission Overhead Conductor; Distribution Overhead Conductor Primary.

Category: Electric

Units: Number of wires down events.

Summary:

Summary Chart of T&D Overhead Wires Down Metric Data (Annual)



Per D.22-10-002 at 8, the IOU RSAR filing date was extended to April 30. As a result, the authorized and recorded Capital spending activities for SDG&E's 2022 RSAR are preliminary and may change as the costs are finalized in the 2022 RSAR.

The metric name and description, risks, category, and units for each metric comes directly from D.21-11-009, Appendix B.

Narrative Context:

As provided in the metric description, a downed conductor, or "wire down," occurs when a conductor drops or breaks from its designed location on a pole and cross arm and falls from its intended position, possibly in an energized mode. A wire down event is one of SDG&E's primary concerns with respect to its overhead equipment. Accordingly, SDG&E continues to take proactive measures to determine the cause of any such wire down event and has a dedicated team reviewing all wire down events to determine the root cause and identify any trends to potentially trigger the development of a new program. The identification of wire-down events key drivers is captured through a collaboration of data analysis and engineering. These drivers include environmental factors such as high winds or coastal corrosion, third-party contact, weather-caused foreign object contact, human or animal-caused foreign object contact, and degradation due to aging infrastructure. For example, more wires down events generally occur in January and February than other months due to weather conditions.

SDG&E has implemented programs targeting the wire most prone to potential wire down events to decrease this risk. SDG&E utilizes risk modeling to determine segments of circuits that have the greatest risk for energized wire downs and then mitigates through installing larger conductor, covered conductor, reconfiguring the system, and/or deploying advanced protection schemes. The mitigations are included in the capital rebuild and wildfire mitigation programs such as SDG&E's Strategic Undergrounding, Overhead System Hardening, and Overhead Public Safety (OPS).

Historical Data:

Ten years of monthly historical data is included in the accompanying Excel file (Attachment B) for the number of instances where an electric transmission or primary distribution conductor is broken and falls from its intended position to rest on the ground or a foreign object. As noted in the

metric definition, this data excludes down secondary distribution wires and "Major Event Days" (typically due to severe storm events) as defined by the IEEE.⁵⁵

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

- Yes. SDG&E's 2022 Executive and non-executive Incentive Compensation Plans include "System and Customer Safety" performance measures. SDG&E has the following systematic program for mitigating wildfire risk through reducing wire down events, as included in the 2022 Executive and non-executive ICPs: Wildfire and PSPS System Hardening. Additionally, when wood poles in the High Fire Threat District (HFTD) need to be replaced, they will be replaced with steel. This goal will be tracked by the project managers of the above-listed programs and verified on the quarterly geographic information system (GIS) reports.
- As stated in Section III, above, SDG&E's Executive and non-executive Incentive
 Compensation Plans are reviewed and updated on an annual basis. For purposes of
 this 2022 report submission, SDG&E references the incentive compensation plans in
 place as of 2022.

Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) - [Yes/No]

 Yes. As described above, SDG&E's 2022 Executive Incentive Compensation and non-executive Incentive Compensation Plans includes a System and Customer Safety metric: Wildfire & PSPS System Hardening. This metric has a weight of 5% of the

35

As defined by IEEE Standard 1366-2012, a Major Event Day is a day when the daily SAIDI exceeds a threshold value, T_{MED}, that is 2.5 standard deviations above the mean of the lognormal distribution based on daily SAIDI values for the previous five years (IEEE, Classification of Major Event Days, at 1-4, available at https://cmte.ieee.org/pes-drwg/wp-content/uploads/sites/61/2003-01-Major-Events-Classification-v3.pdf.) D.21-11-009, Appendix B, n.1.

60% overall safety weighting for SDG&E's 2022 Executive ICP and 3% of the 34% overall safety weighting for SDG&E's 2022 non-executive ICP.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

Yes. SDG&E's Wildfire & PSPS System Hardening metric is linked to all SDG&E
director level or higher positions covered by either the 2022 Executive ICP or 2022
non-Executive ICP.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

- Sempra's Audit Services department reviews SDG&E's annual Executive ICP and non-executive ICP results and calculations. Each safety-related performance metric is well defined in the approved annual ICP plan. The annual ICP plan further specifies how each metric is tracked. SDG&E's ICP performance results are reviewed by the Sempra Audit Services department prior to SDG&E board approval. Additionally, the specific programs/projects noted above within the Fire Hardening ICP metric description are tracked by the project managers and verified on the quarterly GIS reports.
- B. Metric No. 2: Transmission & Distribution (T&D) Overhead Wires Down Major Event Days

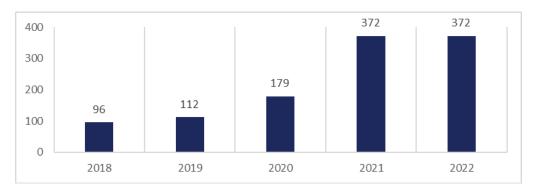
Metric Name and Description per D.21-11-009: "Transmission & Distribution (T&D) Overhead Wires Down - Major Event Days. Number of instances where an electric transmission or primary distribution conductor is broken or remains intact and falls from its intended position to rest on the ground or a foreign object; includes down secondary distribution wires. Includes 'Major Event Days' (typically due to severe storm events) as defined by the IEEE."

Risks: Wildfire; Transmission Overhead Conductor; Distribution Overhead Conductor Primary.

Category: Electric

Units: Number of wires down events.

Summary Chart of T&D Overhead Wires Down Metric Data (Annual)



Narrative Context:

As discussed in the previous metric narrative, a downed conductor, or "wire down," occurs when a conductor drops or breaks from its designed location on a pole and cross arm falls from its intended position, possibly in an energized mode. This metric takes into account both secondary wires and Major Event Days (MEDs). Major Event Days are typically due to severe storm events. SDG&E tracks the number of instances where a primary distribution conductor experiences a wire down in a major event. As required by D.19-04-020, in 2020, SDG&E began to track and report all secondary wires down and identifies those caused by a Major Event.

Historical Data:

Ten years of monthly historical data is included in the accompanying Excel file (Attachment B) for the number of instances where an electric transmission or primary distribution conductor is broken and falls from its intended position to rest on the ground or a foreign object. This metric definition includes down secondary distribution wires and Major Event Days as defined by the IEEE. However, SDG&E did not track downed secondary distribution wires prior to 2020.

Therefore, the data provided includes instances of downed primary distribution conductor, including Major Event Days, for ten years and instances of down secondary wire beginning in 2020. In comparing 2022 to 2021, there was no change in wire down events. In 2022, instances of secondary wire down accounted for 73% of the total.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

Yes. SDG&E's 2022 Executive and non-executive Incentive Compensation Plans include "System and Customer Safety" performance measures.

SDG&E has the following systematic program for mitigation wildfire risk through reducing wire down events, as included in the 2022 Executive and non-executive ICPs: Wildfire & PSPS System Hardening. Additionally, when wood poles in the High Fire Threat District (HFTD) need to be replaced, they will be replaced with steel. This goal will be tracked by the project managers of the above-listed programs and verified on the quarterly GIS reports.

As stated in Section III, above, SDG&E's Executive and non-executive Incentive Compensation Plans are reviewed and updated on an annual basis. For purposes of this 2022 report submission, SDG&E references the incentive compensation plans in place as of 2022.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) $-\,[{\rm Yes/No}]$

• Yes. As described above, SDG&E's 2022 Executive Incentive Compensation and non-executive Incentive Compensation Plans include a System and Customer Safety metric: Wildfire & PSPS System Hardening. This metric has a weighting of 5% of the 60% safety weighting for SDG&E's 2022 Executive ICP and 3% of the 34% safety weighting for SDG&E's 2022 non-executive ICP.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph

6B.) - [Yes/No]

Yes. SDG&E's Wildfire & PSPS System Hardening metric is linked to all

SDG&E director level or higher positions covered by either the 2022

Executive ICP or 2022 non-executive ICP.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in

place for this specific metric.

Sempra's Audit Services department reviews SDG&E's annual Executive

ICP and non-executive ICP results and calculations. Each safety-related

performance metric is well defined in the approved annual ICP plan. The

annual ICP plan further specifies how each metric is tracked. SDG&E's ICP

performance results are reviewed by the Sempra Audit Services department

prior to SDG&E board approval. Additionally, the specific programs/projects

noted above within the Fire Hardening ICP metric description are tracked by

the project managers and verified on the quarterly GIS reports.

C. **Metric No. 3: Electric Emergency Response Time**

Metric Name and Description per D.21-11-009: Electric Emergency Response Time: "Average

time and median time in minutes to respond on-site to an electric-related emergency notification

from the time of notification to the time a representative (or qualified first responder) arrived onsite.

Emergency notification includes all notifications originating from 911 calls and calls made directly

to the utilities' safety hotlines. The data used to determine the average time and median time shall

be provided in increments as defined in GO 112-F 123.2(c) as supplemental information, not as a

metric."

Risks: Wildfire; Overhead Conductor; Public Safety; Worker Safety.

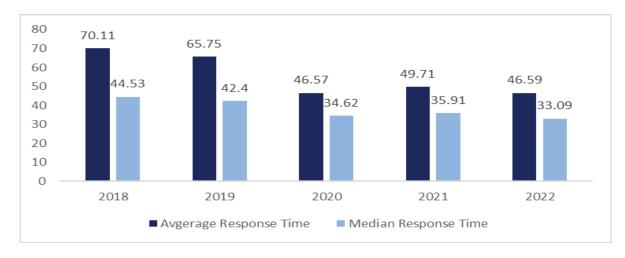
Category: Electric

39

Units: The time in minutes that an electric crew person or a qualified first responder takes to respond after receiving a call which results in an emergency order.

Summary:





Narrative Context:

SDG&E's response to electric emergencies, measured by either median or average times, improved slightly in 2022. This included a notable 16% decline in the total number of electric emergency orders requested. The total number of electric emergency orders during 2022 closely resembles the total amount measured in 2020, and reflects comparable response times to 2022.

SDG&E remains focused on improving electric emergency response times to support the community and its agency partners. Such efforts include discussions with electric emergency responders in reoccurring safety meetings, adding additional shifts during significant weather or public events, and collaboration between dispatch and operations managers on best practices.

Historical Data:

Ten years of monthly historical data is included in the accompanying Excel file (Attachment B). The data captures both the annual and monthly average and median times, in minutes, where qualified SDG&E personnel responded (are on-site) after receiving a 911 emergency request (electric-related) from a government agency (Fire, Police) or from the customer safety hotline. On-

site arrival is defined as arriving at the premises to which the request relates. As noted in the

previous SPMRs, SDG&E's review of historical data identified instances in delayed recording of

actual on-scene arrival times. Since mid-2019, SDG&E has performed manual reviews of arrival to

on-site response times to correct anomalies resulting from human error (e.g., the technician did not

manually click 'onsite' upon arrival on scene) and system errors (e.g., application downtime or

outage). These data corrections use vehicle telematics to confirm onsite arrival time to the requested

address. Given the manual nature of this review, SDG&E did not review (or adjust) data prior to

June 2019. Further, the underlying 911 source data remains unchanged.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher)

Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering

Paragraph 6A.) – [Yes/No]

No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph

6B.) – [Yes/No]

No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in

place for this specific metric.

N/A

D. **Metric No. 4: Fire Ignitions**

Metric Name and Description per D.21-11-009: "Fire Ignitions: The number of fire incidents

annually reportable to the CPUC per Decision 14-02-015."

Risks: Overhead Conductor; Wildfire; Public Safety; Worker Safety; Catastrophic Event

Preparedness.

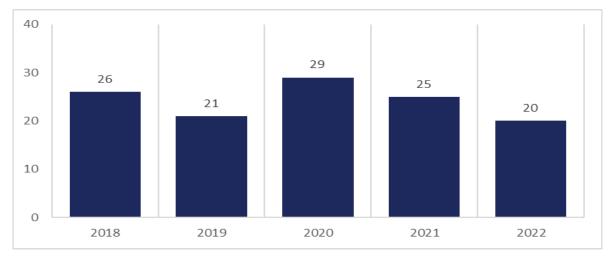
Category: Electric

Units: Number of ignitions.

41

Summary:





Narrative Context:

SDG&E operates its system with safety as a core value. When operating conditions reach elevated or extreme levels, SDG&E implements operating protocols that reduce the risk of ignitions on the system. This can be in the form of disabling automatic reclosers, enabling enhanced protection settings, work restrictions, and in the most extreme cases, shutting off the power to the specific areas that experience the extreme risk. Additionally, SDG&E field employees are required to take an annual training course that focuses on fire prevention and mitigations.

The latest climate projections trend towards the continuation of warmer and dryer conditions, which results in a macro trend of fuels being more receptive to ignition and fire growth. If not mitigated, this trend is likely to lead to an increase in ignition from all sources. SDG&E's wildfire mitigation initiatives attempt to address both the likelihood of an ignition and reduction of the consequences of an ignition should one occur. In 2022, California as a whole experienced a milder fire year as compared to the record years of 2020 and 2021. Throughout the state there were 363,939 acres consumed with 876 structures destroyed.⁵⁶ Over the next three years, SDG&E

⁵⁶ CA.Gov, Cal Fire, Statistics available at https://www.fire.ca.gov/stats-events/.

intends to use data gathered through its mitigation initiatives to identify increased areas of risk and inform mitigation activities.

Since the tracking of ignitions began, utilizing the definition adopted in D.14-02-015, the majority of ignitions have fallen within two primary groups of ignition drivers. These primary drivers are: (1) contact from an outside force on utility infrastructure and (2) equipment failure. Outside forces leading to ignitions comprise items ranging from foil balloons to flying patio umbrellas. For example, since 2014 there have been twenty-four (24) CPUC-reportable fires caused by foil balloons within SDG&E's service territory. Equipment failure also presents a risk of ignition and there are many different types of equipment utilized across the electric system. Both the ignition probability and the consequence of a fire are impacted by the fuel loading near the ignition point. Even with these factors, in 2022 the total combined acreage of all of SDG&E's reportable ignitions was 3.8 acres (20 fires). These 20 ignitions are the lowest total number of CPUC reportable fires since the 2014 definition of a reportable fire was adopted. In 2019, SDG&E established a pilot Ignition Management Program (IMP). The purpose of this program is to track ignitions and potential ignitions in order to ascertain any patterns or correlations. These events are documented and analyzed. Through 2022, the IMP has reviewed 705 evidence of heat reports. This information is then tracked in a database and analyzed by internal subject matter experts. When patterns or correlations are identified, the outcomes are communicated and assigned to mitigation owners from the business unit most logically positioned to eliminate or reduce future events of a similar nature. The corresponding data is used to inform metrics, operational practices, and system hardening. SDG&E also monitors for new emerging ignition concerns using its IMP. As the data is analyzed, it helps to build foundational knowledge about potential ignition sources. This knowledge led to more informed decisions in the areas of fire hardening, fire prevention, and overall risk. SDG&E has also incorporated a process for completing 4-hour notifications, 12-hour

notifications and 30-day reports to California Office of Energy Infrastructure Safety (OEIS) in compliance with California Code of Regulations, Title 14 Section 29300.

To reduce the probability of equipment failure leading to an ignition, SDG&E has, over the past decade, focused on hardening its electric system with legacy programs such as FiRM (Fire Risk Mitigation), PRiME (Pole Risk Mitigation and Engineering), and WiSE (Wire Safety Enhancement), Cleveland National Forest Project (CNF), and current programs like Traditional Hardening, Covered Conductor Hardening, and Strategic Undergrounding. System hardening efforts have expanded to include the replacement of hotline clamps, expulsion fuses, and capacitors. In addition to these mitigation activities, SDG&E continues to expand its extensive Vegetation Management Program, which inspects and maintains clearances between electric facilities and vegetation. SDG&E also partners with fire agencies, community groups, and landowners to implement fuels management projects in areas that will reduce the likelihood of an ignition becoming a wildfire.

In D.14-02-015, the CPUC also adopted a Fire Incident Data Collection Plan that requires investor-owned electric utilities to collect and annually report certain information that would be useful in identifying operational and/or environmental trends relevant to fire-related events.⁵⁷ The purpose of this reporting is to improve regulations and internal utility standards to reduce the likelihood of fires. Reporting requirements are limited to reportable fire events that meet the following criteria:

- A self-propagating fire of material other than electrical and/or communication facilities,
- The resulting fire traveled greater than one linear meter from the ignition point, and

44

D.14-02-015, Ordering Paragraphs 8 and 9 at 99, and Appendix C.

The utility has knowledge that the fire occurred.

Since external reporting of this metric began in 2014,⁵⁸ SDG&E has had only three reportable fires over 10 acres, including 2022 fires incidents. All other CPUC-reportable fires have been less than 10 acres. As stated above, external factors such as vehicles contacting electric equipment, foil balloons, and human activity are shown to have a large impact on the yearly number of reportable fires. The SDG&E service territory continues to experience conditions that can carry fire and the fire activity of the region has not decreased.

Historical Data:

Monthly historical data is provided in the accompanying Excel file (Attachment B) for years 2014 through 2022, containing the number of electric equipment-involved fire incidents annually reportable to the CPUC per D.14-02-015. As noted in the Metric Description, a reportable fire incident includes all the following: "1) Ignition is associated with a utility's powerlines [electric equipment] and 2) something other than the utility's facilities burned and 3) the resulting fire [was self-propagating and] traveled more than one meter from the ignition point." SDG&E will continue to track this metric for inclusion in future Safety Performance Metrics Reports, until a full ten years of historical data is provided. This data is also submitted to the CPUC annually as part of SDG&E's Wildfire Mitigation Plan reportable metrics.⁵⁹

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

Yes. SDG&E's 2022 Executive and 2022 non-executive ICP plans include the following "Fire and Public Safety" performance measure aimed at reducing the risk of fire ignitions:

Id.

See SDG&E 2020 - 2022 Wildfire Mitigation Plan Update (February 11, 2022), available at https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-andsafety/wildfire-mitigation-plans/2022-wmp/.

Wildfire & PSPS System Hardening - The goal of this program is to mitigate the risk of wildfire and minimize the impact of PSPS either through undergrounding portions of the distribution circuits or hardening the overhead distribution system to known local wind conditions. This goal will be tracked by the project managers in the following programs and verified on the quarterly GIS reports.
Programs include Transmission Wood to Steel, Strategic
Underground, Overhead Hardening Program; Corrective Maintenance
Program (CMP).

As stated in Section III, above, SDG&E's Executive and non-executive Incentive Compensation Plans are reviewed and updated on an annual basis. For purposes of this 2022 report submission, SDG&E references the incentive compensation plans in place as of 2022.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) $-\,[{\rm Yes/No}]$

• Yes. As described above, SDG&E's 2022 Executive Incentive Compensation and 2022 non-executive Incentive Compensation Plans include a safety metric for Wildfire & PSPS System Hardening. This metrics is weighted 5% of the 60% safety weighting for SDG&E's 2022 Executive ICP and 3% of the 34% safety weighting for SDG&E's 2022 non-executive ICP.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

 Yes. SDG&E's Wildfire & PSPS System Hardening metric is linked to all SDG&E director level or higher positions covered by either the 2022
 Executive ICP or 2022 non-executive ICP.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

Sempra's Audit Services department reviews SDG&E's annual Executive ICP and non-executive ICP results and calculations. Each safety-related performance metric is well defined in the approved annual ICP plan. The annual ICP plan further specifies how each metric is tracked. SDG&E's ICP performance results are reviewed by the Sempra Audit Services department prior to SDG&E board approval. Additionally, the specific programs/projects noted above within the Fire Hardening ICP metrics description are tracked by the project managers and verified on the quarterly GIS reports.

E. Metric No. 5: Gas Dig-In

Metric Name and Description per D. 21-11-009: "Gas Dig-In: The number of 3rd party gas digins per 1,000 Underground Service Alert (USA) tags/tickets for gas. A gas dig-in refers to any damage (impact or exposure) that results in a repair or replacement of underground gas facility as a result of an excavation. Excludes fiber and electric tickets. A third-party dig-in is damage caused by someone other than the utility or a utility contractor."

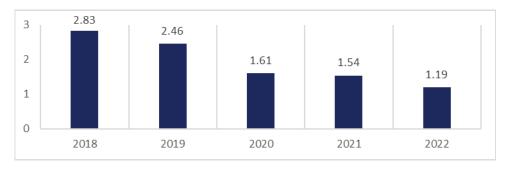
Risks: (1) Transmission Pipeline Failure - Rupture with Ignition, (2) Distribution Pipeline Rupture with Ignition (non-Cross Bore). (3) Catastrophic Damage involving Gas Infrastructure (Dig-Ins).

Category: Gas

Units: The number of 3rd party gas dig-ins per 1,000 USA tags/tickets.

Summary:

Summary Chart of Gas Dig-In Metric Data (Annual)



Narrative Context:

SDG&E began tracking this metric in 2014; however, regulations were not enacted requiring external reporting of this data until 2017.⁶⁰ Over the time period SDG&E has been tracking this metric, SDG&E has seen an increased volume in USA tickets. Third-party gas dig-ins is an identified RAMP risk for SDG&E. SDG&E managed over 194,000 811 USA tickets and reported over 230 dig-in excavation damages in 2022. Analysis of reported damage incidents for 2022 shows that 48% were due to a lack of notification to 811 USA for a locate and mark ticket. Another approximately 50% were due to insufficient excavation practices even after the excavator called 811 USA and underground facilities were marked.

In addition to direct involvement with excavators and 811 USA, SDG&E engages in promoting safe digging practices through its Public Awareness Program following the API Recommended Practice and corporate safety messaging through stakeholder outreach. The message is presented by way of multi-formatted educational materials through mail, email, social media, television, radio, events, and association sponsorships. The California Underground Safety Board established a protocol for investigations of incidents and began issuing violations and fines to third parties in July 2020 and continued issuing notices of probable violation in 2022.

Historical Data:

Monthly data is provided for years 2014 through 2022 in the accompanying Excel file (Attachment B) for the number of third-party gas dig-ins per 1,000 USA tickets. While SDG&E does not have ten years of historical data, SDG&E will continue tracking this metric and will build upon the historical data in each future submission until a full ten years of monthly, historical data is provided.

⁶

⁴⁹ CFR § 192, *et al.*; *id.* at §196; California Government Code § 4216, GO 112-F; and American Petroleum Institute Recommended Practice (API RP) 1162 (December 2003).

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

Yes. SDG&E's 2022 Executive Incentive Compensation and 2022 non-executive Incentive Compensation Plans include a gas safety metric for "Damage Prevention (Damages per USA Ticket Rate)." For ICP purposes, the Damage Prevention (Damages per USA Ticket Rate) consists of the number of damages that cause a gas leak to SDG&E's below ground facilities and the total number of received USA Ticket transmittals. This is a standard industry metric for measuring operator performance for damage prevention.

To calculate this metric, the number of damages is normalized by the number of USA tickets and multiplied by 1,000 to obtain the number of damages per 1,000 tickets. Normalizing by ticket count factors in the year-to-year variation in construction and excavation activities that have a direct influence on damages. This allows for measurable year-to-year performance, allowing this metric to be used as an indicator for success of risk reduction activities.

As stated in Section III, above, SDG&E's Executive and non-executive Incentive Compensation Plans are reviewed and updated on an annual basis. For purposes of this 2022 report submission, SDG&E references the incentive compensation plans in place as of 2022.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) – [Yes/No]

• Yes. As described above, SDG&E's 2022 Executive Incentive Compensation and non-executive Incentive Compensation Plans include a gas safety metric for "Damage Prevention (Damages per USA Ticket Rate)." This metric is weighted at 5% of the 60% safety weighting for SDG&E's 2022 Executive

ICP and 3% of the 34% safety weighting for SDG&E's 2022 non-executive

ICP.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph

6B.) - [Yes/No]

Yes. SDG&E's "Damage Prevention (Damages per USA Ticket Rate)"

metric is linked to all SDG&E director level or higher positions covered by

either the 2022 Executive ICP or 2022 non-executive ICP.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in

place for this specific metric.

Sempra's Audit Services department reviews SDG&E's annual Executive

ICP and non-executive ICP results and calculations. Each safety-related

performance metric is well defined in the approved annual ICP plan. The

annual ICP plan further specifies how each metric is tracked. SDG&E's ICP

performance results are reviewed by the Sempra Audit Services department

prior to SDG&E board approval.

F. Metric No. 6: Gas In-Line Inspection

Metric Name and Description per D.21-11-009: "Gas In-Line Inspection: Total miles of

transmission pipelines inspected annually by inline inspection (ILI) and percentage of transmission

pipelines inspected annually by inline inspections."

Risks: Catastrophic Damage Involving High-Pressure Pipeline Failure.

Category: Gas.

Units: Total number of miles of inspections performed and percentage inspected by ILI.

50

Summary:





Narrative Context:

SDG&E's Transmission Integrity Management Program (TIMP) is federally mandated to identify threats to transmission pipelines in High Consequence Areas (HCAs) or areas outside of HCAs (covered non-HCAs) as required by federal regulations, ⁶¹ determine the risk posed by these threats, schedule prescribed assessments to evaluate these threats, collect information about the condition of the pipelines, take actions to minimize applicable threat and integrity concerns to reduce the risk of a pipeline failure. The SDG&E transmission and distribution system spans from the California-Mexico border to the Pacific Ocean and to the SoCalGas territory border.

Approximately 175 miles out of 213 miles of SDG&E's transmission pipelines are located in HCA areas. ILI is a primary assessment method used by SDG&E and other methods are employed as well. At a minimum of every seven years for HCAs and every ten years for covered non-HCAs, transmission pipelines within scope of the TIMP are assessed using In-Line Inspection (ILI), Direct Assessment, Pressure Test, or other appropriate methods identified in 49 CFR §§ 192.710, 192.921 and 192.937 and remediated as needed.

The TIMP evaluates pipeline Likelihood of Failure (LOF) using the nine threat categories established by PHMSA (External Corrosion, Internal Corrosion, Stress Corrosion Cracking,

⁶¹ 49 CFR § 192, Subpart O and § 192.710.

Mechanical Damage, Manufacturing, Construction, Equipment, Incorrect Operations, and Weather-Related and Outside Force) and evaluates the Consequence of Failure (COF) by considering pipeline operational parameters and the area near the pipeline. The LOF multiplied by the COF produces the pipeline's Relative Risk Score. Further information is collected about the physical condition of transmission pipelines through integrity assessments and action is taken to address applicable threats and integrity concerns to increase safety and preclude pipeline failures.

Based on data analysis and evaluation, detected anomalies are classified and addressed by severity (*i.e.*, immediate, scheduled, monitored) in accordance with 49 CFR § 192.933 and ASME B31.8, with the most severe requiring immediate action. Possible anomalies may include areas where corrosion, weld or joint failure, or other forces are occurring or have occurred. Once areas of concern are identified, sites are prioritized for pipe surface evaluations to validate or re-rank the identified areas. Post-assessment pipeline repairs or reconditioning (*e.g.*, welded steel sleeve repairs or grinding of a defect), when appropriate, and replacements are intended to increase public and employee safety by reducing or eliminating conditions that might lead to an incident.

The numbers and types of TIMP activities vary from year to year and are primarily based on baseline assessment schedule, findings from assessments and interval of reassessments. SDG&E continues to manage and prioritize inspections consistent with federal mandates. HCA segments are required to be assessed at an interval not to exceed seven years and covered non-HCA segments are required to be assessed at an interval not to exceed ten years; therefore, assessments may vary year-to-year. TIMP reduces the risk of failure to the pipeline transmission system, and, on a continual basis, SDG&E evaluates and enhances the program.

One of the enhancements to SDG&E's program has been in response to new regulatory requirements, which are driving the need for enhanced pipeline threat evaluations and inspection efforts for management of potential crack and crack-like defects. The new inspection requirements go beyond the capabilities of the more traditional magnetic flux leakage (MFL) inline inspection

Transducer (EMAT), is being used as a complementary inspection tool along with the traditional tools to inspect for cracks and crack-like defects. The EMAT technology uses ultrasonic waves to produce inspection results but does not require a liquid couplant like traditional ultrasound tools thus permitting the technology to be used contemporaneously with the traditional ILI tools, without introducing liquids to the pipeline. Running the additional EMAT tool during an inspection will increase the total mileage that is logged as inline inspection and provides additional data on the condition of these pipeline segments.

Historical Data:

SDG&E provides annual data for years 2013 through 2022 in the accompanying Excel file (Attachment B). The miles inspected by ILI is an annual metric that is currently reported in Part F of the PHMSA Gas Transmission and Gathering Annual Report F 7100.2-1.62 Pipeline miles reported in the Annual Report F 7100.2-1 are based on individual ILI tool inspections so where there are multiple ILI tools used for inspection, miles are multiplied accordingly. However, the percentage of miles inspected each year is based on the number of distinct miles that have been inspected by ILI and do not include duplicate miles. As previously indicated, the number of assessments and mitigation activities planned under TIMP and to comply with 49 CFR § 192.710 varies from year to year; therefore, data should not be compared on a year-by-year basis.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) $-\,[{\rm Yes/No}]$

No.

_

PHMSA, Gas Transmission and Gathering Annual Report F 7100.2-1, available at https://www.phmsa.dot.gov/forms/gas-transmission-and-gathering-annual-report-form-f-71002-1.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

• No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

• N/A

G. Metric No. 7: Gas In-Line Inspection Upgrade

Metric Name and Description per D.21-11-009: "Gas In-Line Inspection Upgrade: Miles of gas transmission lines upgraded annually to permit inline inspections."

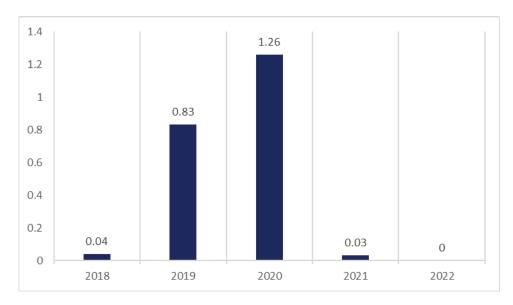
Risks: Catastrophic Damage Involving High-Pressure Pipeline Failure.

Category: Gas.

Units: Miles.

Summary:

Summary Chart of Gas In-Line Inspection Upgrade Metric Data (Annual)



Narrative Context:

As discussed under Metric No. 6, operators of gas transmission pipelines are required to identify the threats to their pipelines, analyze the risks posed by these threats, assess the physical condition of their pipelines, and take actions, where possible, to address potential threats and

integrity concerns before pipeline incidents occur. With approximately 82% of transmission pipelines operated by SDG&E in HCAs, SDG&E has focused on assessing pipelines using ILI; approximately 69% of the entire transmission system is able to accommodate ILI tools as of the end of year 2022 (refer to Metric 13). During 2022, SDG&E had additional gas in-line-inspection upgrade work underway, but it was not fully completed during the calendar year and therefore is not included in this report. This work is expected to be completed in 2023.

SDG&E may retrofit along pipeline routes to allow sufficient clearance for an ILI tool if the pipeline is not already ILI-capable, particularly when ILI is determined to be an appropriate method of assessment for identified threats. A typical retrofit may include replacing valves with less-restrictive valves that allow inspection devices to traverse internally, insertion of tees with bars, and the change-out of bends and other fittings that may impede the progress of the inspection tool. Once the retrofit is completed, the inspection tool is run, followed by excavations to both validate the inspection findings and determine necessary repairs, if needed. As the TIMP evolves and new pipeline segments are included, SDG&E continues to identify opportunities for expanding ILI assessments.

Historical Data:

SDG&E is providing annual data for years 2013 through 2022 in the accompanying Excel file (Attachment B). The miles that can be inspected internally is an annual metric that is currently reported in Part R of the Pipeline and Hazardous Materials Safety Administration (PHMSA) Gas Transmission and Gathering Annual Report F 7100.2-1.63

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

• No.

55

⁵³ *Id*.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

• No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

• N/A

H. Metric No. 8: Gas Shut-In Time – Mains

Metric Name and Description per D.21-11-009: "Gas Shut-In Time – Mains: Median time to shut-in gas when an uncontrolled or unplanned gas release occurs on a main. The data used to determine the median time shall be provided in increments as defined in GO 112-F 123.2(c) as supplemental information, not as a metric."

Risks: Distribution Pipeline Rupture with Ignition (non-Cross Bore).

Category: Gas.

Units: Time in minutes required to stop the flow of gas for Distribution Mains.

Summary:

Summary Chart of Gas Shut-In Time – Mains Metric Data (Annual)



Narrative Context:

The metric includes shut-in time for incidents involving an unplanned and uncontrolled release of gas and Code 1 leaks discovered during routine monitoring and inspection activities. A

Code 1 leak is a leak that represents an existing or probable hazard to persons or property, and requires prompt action, immediate repair or continuous action until the conditions are no longer hazardous. SDG&E responds to emergency calls 24 hours per day, 365 days per year from a myriad of sources, including first responders (e.g., local law enforcement and fire departments) as well as residential, commercial, industrial and agriculture customers. SDG&E's Customer Service Field (CSF) technicians or Gas Emergency Department crews will respond to all calls of gas leaks and perform a gas leak investigation. A leak will be remediated immediately if there is a hazardous condition. If the leak does not create a hazardous situation, SDG&E will monitor the leak until it is remediated. SDG&E has a pipeline safety campaign, which is mandated by federal pipeline safety regulation (49 CFR § 192). SDG&E's campaign includes bill inserts, mailings to residential and business customers, mailings to excavators, businesses, land developers and farmers, and communications to schools and universities, public officials, and emergency officials. Pipeline safety efforts provide customers with information about natural gas pipeline locations; what to do if you sense a leak/smell gas; and messaging to direct the public to call 811 (i.e., Dig Alert); and other recommended actions related to natural gas safety.

SDG&E conducts pipeline monitoring and inspection activities to proactively target risk factors before operation and safety issues arise. These activities include pipeline patrols, leak surveys, bridge and span inspections, unstable earth inspections, atmospheric corrosion inspections, meter set inspections, critical valve inspections, and regulator station inspections. SDG&E proactively surveys its gas distribution system for leakage at frequencies based on the pipe material involved, the operating pressure, whether the pipe is under cathodic protection, and the proximity of the pipe to various population densities as prescribed within 49 CFR § 192.723. Quarterly and biannual surveys are conducted for DOT-defined transmission pipes. Annual surveys are scheduled for all steel and plastic mains and services located in business districts, near public service

establishments, such as schools, churches, hospitals and for DuPont Aldyl-A (PE) pipe installed before 1986 and cathodically unprotected steel pipes located outside of business districts. Three-year survey cycles are typically used for plastic and cathodically protected steel mains and services installed outside of the business districts and in residential areas. The results of leak surveys feed into risk models for pipeline replacement.

If a leak is found during a survey of the gas distribution system, SDG&E takes steps to either remediate or monitor the situation depending on the type of leak classification. As mentioned previously, a leak will be remediated immediately if there is a hazardous condition. If the leak does not create a hazardous situation, SDG&E will monitor the leak until it is remediated. SDG&E has shortened the prescribed timeframe for which leaks will be monitored and scheduled for remediation. The leak survey program has accelerated due to the increased footage for leak surveys, which requires more leak survey activities. Senate Bill (SB) 1371 requires the adoption of rules and procedures to minimize natural gas leakage from Commission-regulated natural gas pipeline facilities consistent with Public Utilities Code section 961(d) and 49 CFR § 192.703(c). SDG&E has been an active participant in the rulemaking and has provided comments as well as met the reporting requirements set forth under SB 1371. SDG&E's first Leak Abatement Compliance Plan and accompanying Advice Letter were approved in 2018 and the Plan is being implemented by the Emissions Strategy Project Management Organization to implement 26 Mandatory Best Practices. This will result in collateral safety benefits.

Historical Data:

SDG&E began tracking this data in 2017 when CPUC GO 112-F went into effect. Monthly historical data for years 2017 through 2022 is included in the accompanying Excel file (Attachment B) reflecting the median time (in minutes) required for the utility to stop the flow of gas during incidents involving mains when responding to any unplanned/uncontrolled release of gas.

Remediation of Code 1 leaks discovered during routine monitoring and inspection activities are

included in the historical data. The time calculated for the response starts when SDG&E first receives notice of a potential gas leak and ends when a qualified representative determines, per SDG&E's emergency standards, that the reported leak is not hazardous or the SDG&E representative completes actions to mitigate a hazardous leak and render it non-hazardous (i.e., by shutting-off gas supply, eliminating subsurface leak migration, repair, etc.) per SDG&E's standards. SDG&E will continue to track this metric for inclusion in future Safety Performance Metrics Reports until a full ten years of monthly historical data is provided. While the shut-in time for gas mains improved slightly compared to 2021, they were still impacted by Covid-19 protocols such as increased coordination, callout efforts, and the increased crew travel time resulting from the crew continuity measure. The crew continuity measure was established to avoid cross-contamination and to limit the spread of the coronavirus at the work site and among the employee population. The small improvement in the 'shut-in' time in 2022 compared to 2021 for gas mains is primarily attributed to enhancements of certain aspects of the callout process allowing increased flexibility and improving the time to request and obtain a crew. Continuous improvement measures are ongoing, both procedurally and with in-field technology.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

• No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

N/A

I. Metric No. 9: Gas Shut-In Time - Services

Metric Name and Description per D.21-11-009: "Gas Shut-In Time – Services: Median time to shut-in gas when an uncontrolled or unplanned gas release occurs on a service. The data used to determine the median time shall be provided in increments as defined in GO 112-F 123.2(c) as supplemental information, not as a metric."

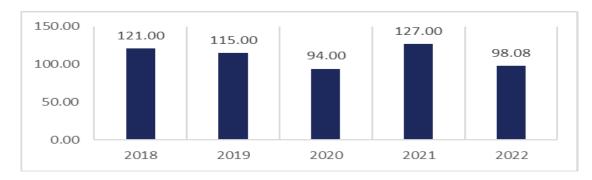
Risks: Distribution Pipeline Rupture with Ignition (non-Cross Bore).

Category: Gas.

Units: Time in minutes required to stop the flow of gas for Distribution Services.

Summary:

Summary Chart of Gas Shut-In Time – Services Metric Data (Annual)



Narrative Context:

As stated above for the previous metric, the Gas Shut-In Time - Services metric includes shut-in time for incidents involving an unplanned and uncontrolled release of gas and Code 1 leaks discovered during routine monitoring and inspection activities. A Code 1 leak is a leak that represents an existing or probable hazard to persons or property and requires prompt action, immediate repair, or continuous action until the conditions are no longer hazardous. SDG&E responds to emergency calls 24 hours per day, 365 days per year from a myriad of sources including first responders (*e.g.*, local law enforcement and fire departments) as well as residential, commercial, industrial and agriculture customers. SDG&E's CSF technicians or Gas Emergency Department crews will respond to all calls of gas leaks and perform a gas leak investigation. A leak will be remediated immediately if there is a hazardous condition. If the leak does not create a

hazardous situation, SDG&E will monitor the leak until it is remediated. SDG&E has a pipeline safety campaign, which is mandated by federal pipeline safety regulation (49 CFR § 192). SDG&E's campaign includes bill inserts, mailings to residential and business customers, mailings to excavators, businesses, land developers, and farmers, and communications to schools and universities, public officials, and emergency officials. Pipeline safety efforts provide customers with information about natural gas pipeline locations; what to do if you sense a leak/smell gas; and messaging to direct the public to call 811 (*i.e.*, DigAlert) and other actions to take related to natural gas safety.

SDG&E conducts pipeline monitoring and inspection activities to proactively target risk factors before operation and safety issues arise. These activities include pipeline patrols, leak surveys, bridge, and span inspections, unstable earth inspections, atmospheric corrosion inspections, meter set inspections, critical valve inspections, and regulator station inspections. SDG&E proactively surveys its gas distribution system for leakage at frequencies based on the pipe material involved, the operating pressure, whether the pipe is under cathodic protection, and the proximity of the pipe to various population densities as prescribed within 49 CFR § 192.723. Annual surveys are scheduled for all steel and plastic services located in business districts, near public service establishments, such as schools, churches, hospitals and for DuPont Aldyl-A (PE) pipe installed before 1986 and cathodically unprotected steel pipes located outside of business districts. Three-year survey cycles are typically used for plastic and cathodically protected steel services installed outside of the business districts and in residential areas. The results of leak surveys feed into risk models for pipeline replacement.

If a leak is found during a survey of the gas distribution system, SDG&E takes steps to either remediate or monitor the situation depending on the type of leak classification. As mentioned previously, a leak will be remediated immediately if there is a hazardous condition. If the leak does

not create a hazardous situation, SDG&E will monitor the leak until it is remediated. SDG&E has shortened the prescribed timeframe for which leaks will be monitored and scheduled for remediation. The leak survey program has accelerated due to the increased footage for leak surveys, which requires more leak survey activities. SB 1371 requires the adoption of rules and procedures to minimize natural gas leakage from Commission-regulated natural gas pipeline facilities consistent with Public Utilities Code section 961(d) and 49 CFR § 192.703(c). SDG&E has been an active participant in the rulemaking and has provided comments as well as met the reporting requirements set forth under SB 1371. SDG&E's first Leak Abatement Compliance Plan and accompanying Advice Letter were approved in 2018, and the Plan is being implemented across the Emissions Strategy Project Management Organization to implement 26 Mandatory Best Practices. This will result in collateral safety benefits.

Historical Data:

SDG&E began tracking this metric in 2017. This data is also reported externally per CPUC GO 112-F. The accompanying Excel file (Attachment B) provides monthly historical data for 2017 through 2022 reflecting the median time (in minutes) required for the utility to stop gas flow during incidents involving services when responding to any unplanned/uncontrolled release of gas. Code 1 leaks discovered during routine monitoring and inspection activities are included in the historical data. The time calculated for the response starts when SDG&E first receives notice of a potential gas leak and ends when a qualified representative determines, per SDG&E's emergency standards, that the reported leak is not hazardous or SDG&E's representative completes actions to mitigate a hazardous leak and render it non-hazardous (*i.e.*, by shutting-off gas supply, eliminating subsurface leak migration, repair, etc.) per SDG&E's standards. SDG&E will continue to track this metric for inclusion in future annual reports until a full ten years of historical data is provided. While the shut-in time for gas services improved compared to 2021, they were still impacted by Covid19 protocols such as increased coordination, callout efforts, and the increased crew travel time

resulting from the crew continuity measure. The crew continuity measure was established to avoid cross-contamination and to limit the spread of the coronavirus at the work site and among the employee population. The reduction in the 'shut-in' time in 2022 compared to 2021 for gas services is primarily attributed to some enhancements of the callout process allowing increased flexibility and improving the time to request and obtain a crew. Continuous improvement in this space is ongoing, both procedurally and in-field technology.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to the Determination of Individual or Group Performance Goals?

(Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

N/A

J. Metric No. 10: Cross Bore Intrusions

Metric Name and Description per D.21-11-009: "Cross Bore Intrusions: Cross bore intrusions found per 1,000 inspections."

Risks: Catastrophic Damage Involving Medium Pressure Pipeline Failure.

Category: Gas.

Units: Number of cross bore intrusions per 1,000 inspections.

Summary Table of Cross Bore Intrusions Metric Data (Annual)

2018	2019	2020	2021	2022
0	0	0	0	0

Narrative Context:

SDG&E's Sewer Lateral Inspection Project (SLIP) was a risk mitigation activity developed and managed as part of SDG&E's Distribution Integrity Management Program (DIMP). SLIP addressed the concerns PHMSA expressed under the DIMP regulations that require operators to address identified threats of low-frequency, but potentially high-consequence events concerning pipeline damage within sewer laterals. Threats to pipeline integrity can occur if a trenchless natural gas pipeline installation inadvertently crosses a sewer line (or "lateral") and penetrates, or bores, through the sewer line, creating what is referred to as a "cross bore."

SDG&E completed all sewer lateral inspections by 2012; only one cross bore intrusion was found and repaired. SDG&E's inspection program of known sewer laterals is complete. Additional rounds of inspections are not required after the initial inspection. Going forward, should a cross bore intrusion be discovered as part of normal operations, it will be remediated, which mitigates the potential of an incident.

Historical Data:

As stated above, SDG&E's sewer lateral inspections were completed in 2012. SDG&E includes monthly data for 2013-2022 in the accompanying Excel file (Attachment B) and as noted in the above chart there are no incidents to report.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) $-\,[{\rm Yes/No}]$

No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph

6B.) - [Yes/No]

No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in

place for this specific metric.

N/A •

K. Metric No. 11: Gas Emergency Response Time

Metric Name and Description per D.21-11-009: "Gas Emergency Response Time: Average time

and median time in minutes to respond on-site to a gas-related emergency notification from the time

of notification to the time a gas service representative (or qualified first responder) arrived onsite.

Emergency notification includes all notifications originating from 911 calls and calls made directly

to the utilities' safety hotlines. The data used to determine the average time and median time shall

be provided in increments as defined in GO 112-F 123.2(c) as supplemental information, not as a

metric."

Risks: Distribution Pipeline Rupture with Ignition.

Category: Gas.

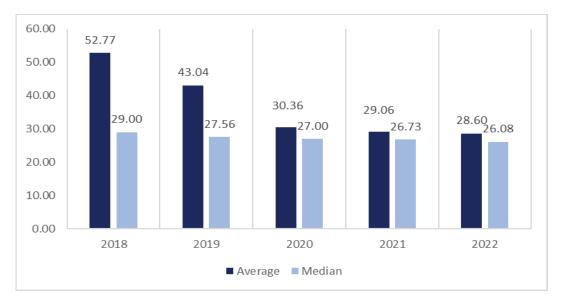
Units: The time in minutes that a Gas Service Representative or a qualified first responder takes to

respond after receiving a call which results in an emergency order.

65

Summary:





Narrative Context:

SDG&E responds to emergency calls 24 hours per day, 365 days per year from a myriad of sources, including first responders (*e.g.*, local law enforcement and fire departments) as well as residential, commercial, industrial and agriculture customers. SDG&E's technicians will respond to all calls of gas leaks or gas odors and perform a gas leak investigation. SDG&E has a pipeline safety campaign, which is mandated by federal pipeline safety regulation (49 CFR § 192). SDG&E's campaign includes bill inserts, mailings to residential and business customers, mailings to excavators, businesses, land developers, and farmers, and communications to schools and universities, public officials, and emergency officials. Pipeline safety efforts provide customers with information about natural gas pipeline locations; what to do if you sense a leak/smell gas; and messaging to direct the public to call 811 (*i.e.*, DigAlert) and other actions to take related to natural gas safety.

SDG&E's Emergency Management organization provides planning and guidance for responding in anticipation of, response to, or following an incident. Emergency Management

effectively and efficiently supports the Company's ability to prepare for, respond to, and recover from incidents regardless of cause, size, or complexity. The overall purpose of emergency preparedness, including planning, is to safeguard the public, employees, contractors, stakeholders, reputation, and the continuation of essential business functions.

SDG&E's primary goal is providing safe, reliable and efficient gas and electric service to customers, while complying with applicable federal, state and local regulations. To reduce the risk of a customer or public incident, SDG&E Field employees are trained to rectify safety hazards on customer premises. SDG&E attributes improvements in response times in part to the addition of dedicated emergency response personnel and the addition of a dedicated overnight shift. SDG&E has implemented other initiatives to improve gas emergency crew locational capabilities, such as vehicle telematics. Since reporting began in 2017, the reporting processes continue to be refined to ensure accurate data is captured for this metric. These refinements have resulted in more consistent month-to-month response times.

Historical Data:

The monthly historical data for October 2017 through December 2022, contained in the accompanying Excel file (Attachment B), provides the average and median time that a Company CSF or Gas Operations representative takes to respond after receiving a call that results in an emergency order. SDG&E began tracking this data in October 2017, when the CPUC's GO 112-F reporting requirements became effective. For purposes of GO 112-F reporting, SDG&E currently reports gas emergency response times and "made safe" times in five- to ten-minute increments. The metric data provided herein differs from that included in the GO 112-F report. GO 112-F reporting is based on completion code; the data for this Safety Performance Metrics Report includes data for all Priority 1 (P1) gas emergency response times. In other words, GO 112-F filters P1 codes by specific completion code, whereas all P1s are included in the metric data included in Attachment B.

SDG&E will continue to track this metric monthly for inclusion in future Safety Performance Metrics Reports until a full ten years of historical data exists.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

Yes. SDG&E's 2022 Executive Incentive Compensation Plan and 2022 non-executive Incentive Compensation Plan each include a metric for "P1 Gas Response Time." This metric is defined as follows: "the Priority 1 gas emergency response time is the average time it takes either Customer Service Field or Gas Operations to respond to a Priority 1 gas emergency. Targets are based on a three-year average of response times adjusted for anomalies including area odors."

As stated in Section III, above, SDG&E's Executive and non-executive Incentive Compensation Plans are reviewed and updated on an annual basis. For purposes of this 2022 report submission, SDG&E references the incentive compensation plans in place as of 2022.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) - [Yes/No]

• Yes. As described above, performance related to SDG&E's P1 Gas

Response Time is included as a goal in SDG&E's 2022 Executive and nonexecutive ICPs. This specific performance measure is weighted at 5% of the
overall 60% public and employee safety operations measures of the 2022

Executive ICP and applies to all SDG&E executives covered by the plan and
is weighted at 3% of the overall 34% public and employee safety operations
measures of the 2022 non-executive ICP and applies to all SDG&E
employees covered by the plan.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

 Yes. SDG&E's P1 Gas Response Time performance measure is linked to all SDG&E director or above positions covered by either the 2022 Executive ICP or 2022 non-executive ICP.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

- Sempra's Audit Services department reviews SDG&E's annual Executive ICP and non-executive ICP results and calculations. Each safety-related performance metric is well defined in the approved annual ICP plan. The annual ICP plan further specifies how each metric is tracked. SDG&E's ICP performance results are reviewed by the Sempra Audit Services department prior to SDG&E board approval.
- L. Metric No. 13: Gas Pipelines That Can Be Internally Inspected

Metric Name and Description per D.21-11-009: "Total miles and percent of system that can be internally inspected ("pigged") relative to all transmission pipelines in the system."

Risks: Catastrophic Damage Involving High-Pressure Pipeline Failure

Category: Gas.

Units: Percentage and Miles.

Summary:

Summary Table of Miles and Percentage of the Gas System that can be Internally Inspected Metric Data (Annual)

	2018	2019	2020	2021	2022
Miles	144	142	142	147	147
Percentage	62%	64%	65%	68%	69%

Narrative Context:

As described above for Metric No. 6, SDG&E's TIMP is federally mandated to identify threats to transmission pipelines in High Consequence Areas (HCAs) or areas outside of HCAs (non-HCAs) as required by federal regulations,⁶⁴ determine the risk posed by these threats, schedule prescribed assessments to evaluate these threats, collect information about the condition of the pipelines, and take actions to minimize applicable threat and integrity concerns to reduce the risk of a pipeline failure. At a minimum of every seven years for HCAs and every ten years for non-HCAs, transmission pipelines within scope of the TIMP are assessed using ILI, Direct Assessment, Pressure Test, or other appropriate methods identified in 49 CFR §§ 192.710, 921 and 937 and remediated as needed.

As stated above for Metric No. 7, SDG&E has focused on the ability of assessing pipelines using ILI, with approximately 69% of the entire transmission system able to accommodate ILI tools as of the end of year 2022.

Historical Data:

This metric presents the number of miles and percentage of the gas system that can be internally inspected, otherwise known as ILI-capable or "piggable" miles. Annual data for 2013 through 2022 is included in the accompanying Excel file (Attachment B). The miles of transmission pipeline that can be internally inspected and the total miles of transmission pipeline are annual metrics that are currently reported in Part R of the PHMSA Gas Transmission and Gathering Annual Report F 7100.2-1.65 These two annual metrics are utilized to calculate the percentage for this metric. This metric, in percentage and miles, has remained relatively constant since 2017 at 61%-69% and 143 – 147 miles because not all transmission pipelines can accommodate ILI tools.

⁶⁴ 49 CFR § 192, Subpart O and § 192.710.

⁶⁵ Supra, n.62.

The remaining percentage that cannot accommodate ILI tools are assessed with other methods.

Retrofitting may take place depending on the factors discussed under Metric No. 7 and would

increase the percentage of piggable mileage.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher)

Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering

Paragraph 6A.) – [Yes/No]

No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph

6B.) - [Yes/No]

No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in

place for this specific metric.

N/A

M. Metric No. 14: Employee Days Away, Restricted and Transfer (DART) Rate

Metric Name and Description per D.21-11-009: "Employee Days Away, Restricted and Transfer

(DART) Rate: DART Rate is calculated based on number of Occupational Safety and Health

Administration (OSHA) recordable injuries resulting in Days Away from work and/or Days on

Restricted Duty or Job Transfer, and hours worked."

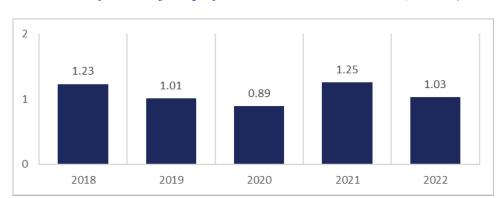
Risks: Employee Safety

Category: Injuries

Units: DART Cases times 200,000 divided by employee hours worked.

71

Summary:



Summary Chart of Employee DART Rate Metric Data (Annual)

Narrative Context:

In 2022, SDG&E experienced a decrease in its DART (Days Away/Restricted/Transfer) case rate from 2021, with an 18% reduction from the value at year-end 2021. The DART case rate is a lagging metric of injury severity, reflecting how many employees are kept away from their regular duties due to an injury or illness. SDG&E's DART performance has shown a general reduction over the past 10 years.

Historical Data:

Ten years of monthly historical data are provided in the accompanying Excel file

(Attachment B) for SDG&E's Employee DART Rate. A DART Rate is calculated based on the

number of OSHA-recordable injuries resulting in Days Away from work and/or Days on Restricted

Duty or Job Transfer, and hours worked.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) [Yes/No]

• Yes. SDG&E's 2022 Executive Incentive Compensation Plan and 2022 nonexecutive Incentive Compensation Plan include the following metric:

- Lost Time Incident (LTI) Rate⁶⁶ the LTI Rate is expressed as the number of OSHA Recordable Injuries or Illnesses resulting in Days Away from Work, per 100 full-time employees. This measure is calculated using the number of Lost-time Incidents x 200,000 divided by the Total Hours Worked. While the LTI rate and DART rate both evaluate OSHA-recordable cases resulting in Days Away from Work, the DART rate additionally evaluates cases resulting in Days on Restricted Duty or Job Transfer.
- As stated in Section III, above, SDG&E's Executive and non-executive Incentive Compensation Plans are reviewed and updated on an annual basis. For purposes of this 2022 report submission, SDG&E references the incentive compensation plans in place as of 2022.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) – [Yes/No]

• Yes. As described above, performance related to SDG&E's LTI Rate is included in SDG&E's 2022 Executive and non-executive ICPs. This specific performance measure is weighted at 5% of the overall 60% public and employee safety operations measures in the 2022 Executive ICP and applies to all SDG&E executives covered by the plan and is weighted at 4% of the overall 34% public and employee safety operations measures in the 2022 non-executive ICP and applies to all SDG&E employees covered by the plan.

73

OART cases are OSHA Recordable Injuries or Illnesses resulting in Days Away from Work, or Days On Restricted Duty or Job Transfer.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

Yes. SDG&E's LTI Rate performance measure is linked to all SDG&E
director or above positions covered by either the 2022 Executive ICP or 2022
non-executive ICP.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

- Sempra's Audit Services department reviews SDG&E's annual Executive ICP and non-executive ICP results and calculations. Each safety-related performance metric is well defined in the approved annual ICP plan. The annual ICP plan further specifies how each metric is tracked. SDG&E's ICP performance results are reviewed by the Sempra Energy Audit Services department prior to SDG&E board approval.
- Metric No. 15: Rate of Serious Injuries or Fatalities (SIF) Actual (Employee)

 Metric Name and Description per D.21-11-009: "Rate of Serious Injuries or Fatalities (SIF)

 Actual (Employee): Rate of SIF Actual (Employee) is calculated using the formula: Number of SIF-Actual cases among employees x 200,000 / employee hours worked, where SIF Actual is counted using the methodology developed by the Edison Electrical Institute's (EEI) Occupational Health and Safety Committee (OHSC) Safety and Classification Learning Model. If a utility has implemented a replicable, substantially similar evaluation methodology for assessing SIF Actual, the utility may use that method for reporting this metric. If a utility opts to report the rate of SIF Actual using a method other than the EEI Safety Classification Model, it must explain how its methodology for counting SIF Actual differs and why it chose to use it. As a supplemental reporting requirement to the SIF Actual Rate for comparative purposes, all utilities shall also provide SIF Actual data based on OSHA reporting requirements under Section 6409.1 of the California Labor

Code."

Risks: Employee Safety

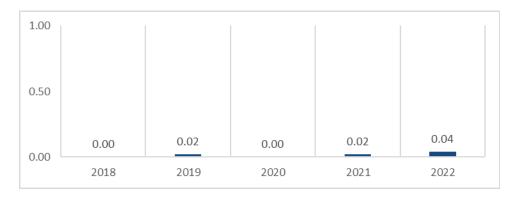
Category: Injuries

Units: Number of SIF-Actual cases among employees x 200,000/employee hours worked.

Summary:

Summary Chart of Rate of Serious Injuries or Fatalities (SIF) Actual (Employee)

Metric Data (Year-end)



Narrative Context:

Employees afety is a core value at SDG&E. SDG&E's safety-first culture focuses on its employees, customers, and the public, and is embedded in every aspect of the Company's work. Employees should be able to go home to their families and loved ones after work each day and be able to return to work safely the next day. Safety is not compromised for production, customer satisfaction, or other goals, and no activity is so important that it should jeopardize employee, customer, or public safety. SDG&E's Employee Safety risk mitigation programs are founded on proven employee-based programs, safety training, workforce education, site inspections, and SDG&E's Injury and Illness Prevention Program (IIPP).

SDG&E has in place a range of safety programs and initiatives within its SMS designed to identify, address, communicate, and mitigate and/or eliminate workplace hazards, and to contribute proactively to overall workplace safety and employee awareness of safety issues and concerns.

These programs include:

- Injury and Illness Prevention Program (IIPP): Every California employer
 must have an effective written IIPP plan for preventing injury and illness. The
 IIPP pertains to a range of required elements and associated procedures, such
 as: management commitment/assignment of responsibilities; safety
 communications system with employees; assuring employee compliance with
 safe work practices; scheduled inspections and evaluation system; accident
 investigation; procedures for correcting unsafe or unhealthy conditions; safety
 and health training and instruction; and recordkeeping and documentation.
- Safety Training: Training is a crucial element of a successful and sustainable safety and health program. SDG&E is committed to ensuring that its employees perform their job duties safely and in compliance with all applicable safety laws, rules, regulations, permit requirements, and company standards. SDG&E's extensive range of safety training courses provides employees the means to perform their job tasks safely.
- Inspections: Safety inspections are a principal means of identifying potential hazards and help to determine what safeguarding is necessary to prevent incidents, injuries, and occupational illnesses. The inspection program addresses procedures for conducting safety inspections and self-assessments, describes the process of documenting corrective actions and their implementation, and defines roles and responsibilities.
- Industrial Hygiene Programs: SDG&E has robust Industrial Hygiene programs in compliance with Cal/OSHA regulations. Industrial Hygienists are responsible for monitoring changes in employee safety and health regulations, developing internal safety policies and procedures to confirm

- compliance with the applicable regulations, and managing Company-wide implementation of key industrial hygiene programs, on such topics as Hazard Communications, Hearing Conservation, Respiratory Protection, Mold, Asbestos, and Lead Exposure Management, Arc Flash and Confined Space.
- Environmental and Safety Compliance Management Program (ESCMP):

 ESCMP is a management system that monitors the effectiveness of environmental, health and safety activities, similar to the internationally accepted standard, International Organization for Standardization (ISO)

 14001.⁶⁷ It establishes procedures and defines roles and responsibilities necessary to ensure conformance to the IIPP and other requirements applicable to safety aspects of SDG&E operations.
- oSHA and Cal/OSHA Voluntary Protection Programs (VPP): The Federal and California VPP are labor-management-government cooperative programs designed to recognize workplaces that manage outstanding health and safety systems for protection of workers and exceed minimal compliance with the Federal and Cal/OSHA Title 8 California Code of Regulations. OSHA's VPP recognize employers who have implemented effective safety and health management systems and maintain injury and illness rates below national Bureau of Labor statistics averages for their respective industries. In VPP, management, labor, and OSHA work cooperatively and proactively to prevent fatalities, injuries, and illnesses through a system focused on hazard prevention and control; worksite analysis; training; and management commitment and worker involvement. To participate, employers must submit

⁶⁷ ISO 14000 family - "Environmental Management."

- an application to OSHA (or Cal/OSHA) and undergo a rigorous onsite evaluation by a team of safety and health professionals. VPP participants are re-evaluated every three to five years to remain in the programs. SDG&E currently has two VPP-certified sites and is in the process of assessing an additional site for Cal/OSHA VPP certification.
- Personal Protective Equipment (PPE): SDG&E's PPE program establishes a comprehensive approach toward controlling potential employee injuries and eliminating or mitigating exposure to specified hazards when and where needed. PPE includes uniforms and equipment designed to protect employees while performing their job (*e.g.*, fire retardant uniforms, gloves, protective eyewear). All employees who are required to use PPE are trained on when PPE is necessary, what PPE is necessary, how to properly don/remove/adjust/wear PPE, limitations of PPE and the proper care, maintenance, life and disposal of PPE.
- Drug and Alcohol Testing Program: SDG&E has an employee drug and alcohol testing program managed in accordance with state and federal regulations. SDG&E's substance abuse prevention policy, which all employees are responsible for knowing and complying with, prohibits the use or possession of alcohol during working hours or reporting to work with alcohol or prohibited drugs in their system. Violations of this policy are cause for disciplinary action, up to and including employment termination. In addition to the substance abuse prevention policy, SDG&E deploys Substance Abuse Prevention Training as a proactive measure.

- Behavior Based Safety (BBS) Program: BBS is a proactive approach to safety and health management, focusing on principles that recognize at-risk behaviors, which can be a frequent cause of both minor and serious injuries.

 BBS is intended to reduce the occurrence of at-risk behaviors by modifying an individual's actions and/or behaviors through observation, feedback, and positive interventions aimed at developing safe work habits. SDG&E has five BBS processes in the gas, electric and customer service field organizations.
- Facilities Maintenance Program: Facilities Capital projects are designed to
 make workspaces safer. Facilities maintenance programs are preventative,
 provide predictive and corrective maintenance, and are used to address
 deficiencies. Examples include structural changes and asbestos inspection and
 abatement.
- Traffic Control for employee, contractor and public safety at worksites: When performing work on, or adjacent to, a roadway, SDG&E is responsible for installing and maintaining such devices, which are necessary to provide safe passage for the traveling public through the work area and for the safety of the workers on the site. SDG&E uses both internal and external resources to fulfill this responsibility.
- Work Methods and Standards: SDG&E's electric engineering departments
 develop and maintain construction standards, standard practices, and system
 design for electric service, primary and secondary systems, and seek
 continuous improvement of the electric systems through innovation and
 incorporation of new technologies.

- Stop Work Authority (*i.e.*, Stop the Job/Stop the Task): SDG&E employees, regardless of rank or title, are given the authority to "stop a job" at any time if they identify a safety hazard and are encouraged to raise a red flag whenever they feel it is needed.
- e Close Call/Near-Miss Program: SDG&E recognizes the importance of learning from close calls and near-misses to reduce the potential for a serious incident or injury in the future. The National Safety Council describes a close call or near-miss as an unplanned event that did not result in injury, illness, or damage, but had the potential to do so. SDG&E encourages employees to report close calls in safety meetings and through an online process. SDG&E's online process allows employees to report anonymously through an electronic form. The information is submitted to Safety Services for review and may be shared with other employees, so they understand and benefit from the lessons learned.
- Job Observations: SDG&E field-based organizations perform documented observations of front-line operational employees. Observations provide the opportunity to identify if workers can safely perform the task, determine why a precaution was or was not taken, and provide feedback on the positive things a person is doing for his/her own safety.
- Incident Investigation: As part of improving its safety culture, SDG&E has established a team to create a more comprehensive and robust incident investigation standard and reporting process. Applying this process uniformly across the Company will result in more consistent investigations and will allow lessons learned to be shared broadly. In addition, regular training is

- provided for those conducting incident investigations to confirm consistency and more thorough investigations.
- Safe Driving Program: SDG&E utilizes the Smith System® Defensive

 Driving System as part of safe driving training for employees. The Smith

 System® concepts help drivers see, think and act their way through various

 driving environments, challenges, and changes that may exist regardless of

 where a driver travels or the type of vehicles he or she operates.
- Executive Safety Council (ESC) Team Meeting Dialogs: The ESC is the governing body for all safety committees. Led by SDG&E's Chief Operations Officer and Director of Safety, the ESC advances the Company safety culture and addresses enterprise-wide safety strategy. The meeting dialogs are held at Company locations and integrate employee and supervisor dialog sessions so that employees have an opportunity to share safety experiences with Company leadership.
- Field and Office Safety Committees: These site-specific committees are actively engaged in safety awareness through education, promoting a healthy lifestyle, encouraging work-life balance, and always maintaining a safe work environment. To keep the committees connected, quarterly meetings are held with committee chairpersons and co-chairpersons. During these meetings, safety updates are shared, training is provided, and action planning steps are identified. Like all other safety committees, site committees report to the ESC as the governing body.
- Electric Safety Subcommittee (ESS): The ESS brings management and electric front-line personnel together to discuss safety concerns from the

perspective of those closest to the risks. The objectives are to make a lasting difference in reducing unnecessary risk, resolve division-wide safety issues/concerns, and facilitate two-way communication between frontline employees and their respective management.

- Gas Safety Subcommittee (GSS): Since 2015, the GSS has engaged employee representatives from each district and management on a monthly basis to discuss concerns and address potential gas operations safety hazards. The objective is to reduce unnecessary risk, resolve gas safety issues/concerns, and facilitate two-way communication between frontline employees and their respective management.
- office Safety Committees: The Office Safety Subcommittee was established in 2020 to drive office safety at SDG&E's headquarters location. It comprises chairpersons of departmental office safety committees and is designed to increase awareness, and share best practices and lessons learned, around office safety. This committee meets regularly to review leading and lagging indicator data and discuss initiatives, including development of office safety programs. In 2022, the Office Safety Committee was formed comprising Directors of office-based organizations. This committee rolls up to the Executive Safety Council as the governing body.
- Safety Tailgates: Safety tailgate talks are short informational meetings held with employees to discuss work-site-related safety. The purpose of a tailgate is to inform employees of specific hazards associated with a task and the safe way to do a job. Tailgate talks also serve as a reminder to employees of what

- they already know while establishing the supervisor's credibility and conscientiousness about his oversight role.
- Safety Meetings: The main objectives of a safety meeting are to remind employees of safe practices they have already learned and to introduce and build awareness of new techniques, new equipment, or new regulations that must be observed.
- Safety Stand-downs: These are voluntary events for employers to talk directly to employees about safety. They provide an opportunity to discuss hazards, protective methods, and the Company's safety policies, goals, and expectations.
- Safety Congress and Leadership Awards: Since 2002, this event has been held annually. It provides a forum for safety committee members, safety leaders, and others to share and exchange information and ideas through networking and workshops. At this event, individuals and teams are recognized for living by the Company's safety vision, turning that vision into action, embracing the SDG&E safety culture, and demonstrating safety leadership.

SDG&E continually evaluates initiatives to further reduce the risk of serious employee injury. For instance, SDG&E has undertaken an enhanced Safety in Action (SIA) initiative.

Designed for executives and field operations directors, the initiative provides SDG&E with the necessary tools to measure SIF exposures, understand the Company's specific SIF exposure precursors, and design effective steps to eliminate or mitigate SIF exposure. This is a leading indicator program that goes beyond traditional classification and recording of incidents to evaluate both the exposures that resulted in an actual SIF and those that have reasonable potential to result in

a SIF, with the objective to mitigate SIF exposure. Tools in this program include an SDG&E-specific SIF definition and criteria for assessing SIF exposure potential and leading and lagging SIF metrics. Subject matter experts throughout the Company have been trained on the process and effective use of the tools. Goals and objectives for the SIA initiative demonstrate a forward-moving effort to improve safety and will be measurable. To determine the Rate of SIF Actual (Employee), SDG&E uses the Cal/OSHA definition of "serious injury" defined in CCR, Title 8, §330(h) to be consistent with the California reporting requirements.

Historical Data:

Ten years of monthly historical data are provided in the accompanying Excel file (Attachment B) for SDG&E's Employee Serious Injury and Fatality rate. The incidents related to this data currently are reported to Cal/OSHA at the time of occurrence. SDG&E notes that a new definition of "Serious Injury" went into effect in California on January 1, 2020, which may affect the number of reportable incidents in 2020 and beyond.⁶⁸

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

- Yes. SDG&E's 2022 Executive and non-executive Incentive Compensation
 Plans include the following employee safety-related metrics:
- Lost Time Incident (LTI) Rate the LTI Rate is expressed as the number of OSHA
 Recordable Injuries or Illnesses resulting in Days Away from Work, per 100 full-

-

Effective January 1, 2020, Cal/OSHA revised its injury reporting obligations to be more aligned with the injury reporting obligations under federal OSHA. The 24-hour minimum time requirement for hospitalizations was removed. Accordingly, any hospitalization will be reportable, excluding those for medical observation or diagnostic testing. The full text of the new "serious injury or illness" definition, as of Jan. 1, 2020, is: "Any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization, for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone." Assembly Bill (AB) 1805, amended Labor Code, § 6302(h).

- time employees. This measure is calculated using the number of Lost-time Incidents x 200,000 divided by the Total Hours Worked.
- Controllable Motor Vehicle Incidents (CMVI) –Motor vehicle incident records in the electronic Safety Information Management System will document controllability.
- Field Observations The Company has developed a leading indicator safety metric which counts the number of documented observations to front-line operational employees. An observation is defined as a visit to an employee or crew work site in which work is observed and documented, with at minimum the date of observation and notes on the observation. Note: Remote workers may get visited virtually, and BBS (Behavior Based Safety) peer to peer observations are also eligible.
- Near Misses Reported A leading indicator metric in which a near miss is reported by an employee of an event that had no injuries or illnesses but could have easily resulted in an injury or illness. Employees submit these near miss events through a SDGE desktop or mobile application designed specifically for near miss reporting. It is measured by counting the number of documented near misses submitted.
- As stated in Section III, above, SDG&E's Executive and Non-executive Incentive Compensation Plans are reviewed and updated on an annual basis. For purposes of this 2022 report submission, SDG&E references the incentive compensation plans in place as of 2022.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) – [Yes/No]

• Yes. As described above, performance related to (1) LTI Rate, (2) CMVI, (3) Field Observations, and (4) Near Misses Reported are included in SDG&E's 2022 Executive and non-executive ICPs. These specific performance measures are each weighted 3% - 5% of the overall 60% public and employee

safety operations measures in the 2022 Executive ICP which applies to all SDG&E executives covered by the plan and are weighted at 1% - 5% of the overall 34% of public and employee safety operations measures of the 2022 non-executive ICP which applies to all SDG&E employees covered by the plan.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

 Yes. SDG&E's (1) LTI Rate, (2) CMVI, (3) Field Observations, and (4) Near Misses Reported performance measures are linked to all SDG&E director or above positions covered by either the 2022 Executive ICP or 2022 nonexecutive ICP.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

- Sempra's Audit Services department reviews SDG&E's annual Executive ICP and non-executive ICP results and calculations. Each safety-related performance metric is well defined in the approved annual ICP plan. The annual ICP plan further specifies how each metric is tracked. SDG&E's ICP performance results are reviewed by the Sempra's Audit Services department prior to SDG&E board approval.
- O. Metric No. 16: Rate of SIF Actual (Contractor)

Metric Name and Description per D.21-11-009: "Rate of SIF Actual (Contractor): Rate of SIF Actual (Contractor) is calculated using the formula: Number of SIF-Actual cases among contractors x 200,000 / contractor hours worked, where SIF Actual is counted using the methodology developed by the EEI OHSC Safety and Classification Learning Model. If a utility has implemented a replicable, substantially similar evaluation methodology for assessing incidents where a SIF occurred, the utility may use that method for reporting this metric. If a utility opts to report the rate

of SIF Actual using a method other than the EEI Safety Classification Model, it must explain how its methodology for counting SIF Actual differs and why it chose to use it. As a supplemental reporting requirement to the SIF Actual Rate for comparative purposes, all utilities shall also report SIF Actual Rate data based on OSHA reporting requirements under Section 6409.1 of the California Labor Code."

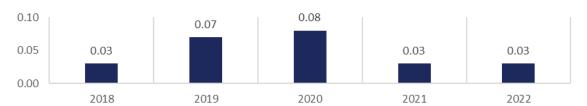
Risks: Contractor Safety

Category: Injuries

Units: Number of SIF-Actual cases among contractors x 200,000/contractor hours worked.

Summary:

Summary Chart of Rate of SIF Actual (Contractor) Metric Data (Year-end)



Narrative Context:

All Class 1 Contractors are included in this metric. In an effort to further reduce the risk of serious injuries and fatalities to its Class 1 contractors, SDG&E has implemented programs such as "Stop the Job" and "Near Miss Reporting." The Stop the Job (STJ) Process is a protocol SDG&E has established for all contractors. It gives authority to everyone onsite to stop a job or task if an unsafe work condition or activity is identified. All work must immediately cease in the area of concern once the STJ is declared until site supervision and the involved contractor(s) have conducted an investigation, the identified situation is abated, controlled, or otherwise determined to be safe, and the situation and outcome are explained to affected personnel. SDG&E requires its Class 1 contractors to report all incidents per the Class 1 Contractor Safety Manual including near miss/close call incidents immediately, then monthly in a report. This information is then tracked and used during SDG&E's Class 1 Contractor safety observations and communicated to contractors,

if applicable. As SDG&E receives incident reports from contractors, they are reviewed for accuracy and closed out. Additionally, as contractors submit their monthly hours, the data is reviewed for accuracy by Contractor Safety Services and the SDG&E business unit engaging the contractor.

SDG&E updates the Class 1 Contractor Safety Manual annually, or as needed, with new requirements to conform to changed regulatory and other SDG&E requirements. Class 2 Contractors do not fall within the enhanced SDG&E Contractor Safety Program. Class 2 Contractors are defined as: a contractor engaged to perform any other work (than work defined as Class 1). Examples of Class 2 Contractors include contractors engaged to perform administrative tasks or information technology (IT) work. SDG&E has transitioned near miss and incident reporting into a Third-Party Administration Tool. This new tool has made reporting easier for the contractors and simplifies the tracking and reporting process for the SDG&E team.

Historical Data:

SDG&E began tracking SIF Actual events in 2018. The accompanying Excel file (Attachment B) provides monthly data for 2018 through 2022 for SDG&E's Contractor Serious Injuries and Fatalities. According to the metric description, reportable incidents from 2018 through year end 2019 were "a work-related injury or illness that results in a fatality, inpatient hospitalization for more than 24 hours (other than for observation purposes), a loss of any member of the body, or any serious degree of permanent disfigurement." A new definition of "Serious Injury" went into effect in California on January 1, 2020, which may impact the number of reportable incidents in 2020 and beyond. This new definition is "A Work-Connected injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or in which an employee suffers a loss of any member of the body or suffers any serious degree of permanent disfigurement." The reported-on metric is based on the CAL OSHA definition of a SIF Actual event and Fatality for the 2018-2021 data. SDG&E has determined that the CAL OSHA definition and EEI models are very

similar for this metric with the CAL OSHA classification encompassing all incidents that would be

tracked in the EEI model. SDG&E utilizes a third-party administration tool to collect SDG&E-

specific incidents for the data reported to OSHA and included in Attachment B. SDG&E will

continue collecting this data for inclusion in future annual Safety Performance Metrics Reports until

a full ten years of monthly historical data exists.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher)

Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering

Paragraph 6A.) – [Yes/No]

No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph

6B.) - [Yes/No]

No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in

place for this specific metric.

• N/A

Metric No. 17: Rate of SIF Potential (Employee)

Metric Name and Description per D.21-11-009: "Rate of SIF Potential (Employee): Metric is

calculated using the formula - Number of SIF Potential cases among employees x

200,000/employee hours worked, where a SIF incident, in this case would be events that could have

led to a reportable SIF."

Risks: Employee Safety.

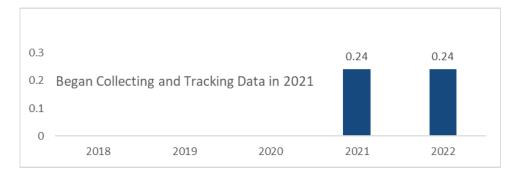
Category: Injuries.

Units: Number of SIF-Potential cases among employees x 200,000/employee hours worked.

89

Summary:

Summary Chart of Rate of SIF Potential (Employee) Metric Data (Annual) 69



Narrative Context:

The best defense against serious injury is the awareness and reduction of exposure. SDG&E's Serious Injury & Fatality (SIF) Prevention Initiative involves an ongoing process of assessing and evaluating injury, illness, motor vehicle and near miss cases for SIF potential. The objective of this initiative is to identify and remediate SIF precursors to help avoid future injuries, broaden awareness of high-risk situations in our daily work, and bring forward strong and effective corrective actions.

- "SIF potential" means the event outcome has a reasonable and realistic possibility to be an actual SIF, if the SIF precursors are allowed to continue.
- "SIF precursor" is a high-risk situation in which control measures are absent,
 ineffective or not complied with, and that could result in a serious or fatal injury if
 allowed to continue.

To determine SIF Potential for employee-related cases, SDG&E originally developed criteria in collaboration with the consultant Dekra in 2020 as part of its SIF Prevention Initiative

-

In the 2021 SPMR, SDG&E reported the Rate of SIF Potential (Employees) metric using a methodology other than the model espoused by the EEI. To align with the other California IOUs, SDG&E reevaluated the cases in 2021 using the EEI Occupational Health and Safety Committee Safety and Classification Learning (SCL) Model and used that methodology for 2022 and will continue to do so going forward. The historical data reflected for this metric in the 2022 SPMR utilizes the SCL Model.

and used the Dekra methodology from March 2021 into the third quarter of 2022. To align with the other California IOUs and for consistency in reporting, SDG&E re-evaluated cases assessed during that period using the methodology espoused in the EEI Occupational Health and Safety Committee Safety and Classification Learning (SCL) Model. SDG&E will continue to use the EEI methodology going forward.

The EEI SCL model, due to its design and decision logic, results in substantially fewer cases being categorized as pSIF compared with prior assessments using the Dekra-based methodology. However, one lesson learned from performing the assessments using the EEI SCL Model is that the additional "outcome" categories in the EEI SCL Model methodology can offer more precise characterization for hazards recognized, enhances insights, perspective and learning opportunities for users due to the broader differentiation, and can lead to greater understanding of common and uncommon high-risk factors across the Company when these insights are shared.

Historical Data:

Implemented in 2021, SDG&E's Serious Injury and Fatality Exposure Assessment Program provides SDG&E with the necessary tools to measure SIF exposure, understand the Company's specific SIF precursors, and design effective steps to mitigate SIF exposure.

Formal assessment of SDG&E injury, illness, motor vehicle and near miss cases began in March 2021. Data for the months of March 2021 through December 2022 are provided in the accompanying Excel file (Attachment B) for SDG&E's Employee SIF Potential rate. As noted above, the historical data for 2021, previously reported using the Dekra model has been restated to reflect the EEI Occupational Health and Safety Committee Safety and Classification Learning (SCL) Model.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

• No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

• N/A

Q. Metric No. 18: Rate of SIF Potential (Contractor)

Metric Name and Description per D.21-11-009: "Rate of SIF Potential (Contractor): Metric is calculated using the formula - Number of SIF Potential cases among contractors x 200,000/contractor hours worked, where a SIF incident, in this case would be events that could have led to a reportable SIF. Potential SIF incidents are identified using the EEI Safety Classification and Learning Model." 70

Risks: Contractor Safety.

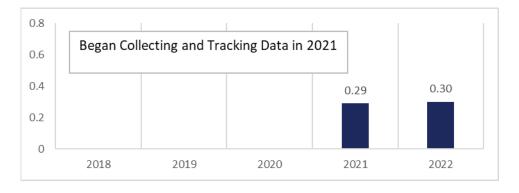
Category: Injuries.

Units: Number of SIF-Potential cases among contractors x 200,000/contractor hours worked.

D.21-11-009, Appendix B at 8 (citing Edison Electric Institute Safety Classification and Learning Model developed by Dr. Matthew Hallowell).

Summary:

Summary Chart of Rate of SIF Potential (Contractor) Metric Data (Annual)



Narrative Context:

SDG&E's Contractor Safety Program requires Contractors to investigate incidents in accordance with SDG&E's Contractor Safety Manual. For Level 2 and 3 incidents, which include fatalities, life-impacting and serious injuries, SIF Potential events, among others, SDG&E will initiate its own formal internal incident investigation.

When an incident occurs involving a contractor performing work on SDG&E's projects or property, the business area that engaged the contractor (Business Unit) is responsible for determining the Incident Type. For Level 2 and 3 incidents, the Director of the Business Unit and the Director of Safety must designate the appropriate investigation team within two days of being notified of the incident. In addition, Contractor Safety Services will issue an incident alert companywide. At the conclusion of the investigation, findings are entered into ISNetworld⁷¹ and distributed to all potentially affected contractors and employees. This information includes contributing factors, and mitigations to prevent recurrence, and is used in the field to support a proactive effort and help prevent a similar type of event.

_

SDG&E uses a third-party administrator, ISNetworld, to house and verify the established SDG&E prequalification requirements for Class 1 Contractors. ISNetworld also serves as a communication portal for contractors to receive communications.

The Rate of SIF Potential applicable to Contractor activities metric was adopted by the Commission in D.21-11-009. Upon its adoption, SDG&E added SIF Potential events to the required reportable events Class 1 Contractors report. The current definition of a SIF Potential event for contractors is "A Work-Connected event where a flaw or weakness (in an action or tool) that if left uncorrected, could result in a serious injury or fatality." The definition SDG&E Contractor Safety uses was initiated in 2021 for all Class 1 Contractors prior to the decision by the CPUC to require reporting. SDG&E recognizes that the EEI SCL methodology, due to its design and decision logic, likely results in substantially fewer cases being categorized as pSIF compared with the current methodology SDG&E Contractor Safety uses for SIF Potential events. This difference will be reflected in a relatively higher pSIF Rate for SDG&E compared to utilities using the EEI SCL methodology for all incidents through December 31, 2022.

A key lesson learned from the assessments to date is that the methodology provides a powerful tool for hazard recognition, revealing common high-risk factors within and across multiple organizations within the Company. Results from these insights can be shared and can lead to stronger and more effective corrective actions.

Historical Data:

Implemented in 2021, SDG&E's Serious Injury and Fatality Exposure Assessment Program provides SDG&E with the necessary tools to measure SIF exposure, understand the Company's Class 1 Contractors specific SIF precursors, and design effective steps to mitigate SIF exposure.

Formal review of all Class 1 Contractor events is conducted by SDG&E Contractor Safety Services based on our current SIF Potential definition. When an event is determined to have SIF Potential the Company follows the process for a Level 2 event.

⁷² SDG&E Contractor Safety Manual, Class 1 Contractors (Version 2022.1) at 9, available at https://www.sdge.com/contractor-safety-program-resources.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) – [Yes/No]

No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

• N/A

R. Metric No. 19: Contractor Days Away, Restricted Transfer (DART)

Metric Name and Description per D.21-11-009: "Contractor Days Away, Restricted Transfer (DART) - DART Rate: Days Away, Restricted and Transfer (DART) Cases include OSHA-recordable Lost Work Day Cases and injuries that involve job transfer or restricted work activity. DART Rate is calculated as: DART Cases times 200,000 divided by contractor hours worked.

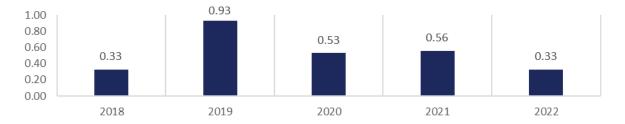
Risks: Contractor Safety.

Category: Injuries.

Units: OSHA DART Rate.

Summary:

Summary Chart of Contractor Days Away, Restricted Transfer (DART) Metric Data (Annual)



Narrative Context:

All Class 1 Contractors are included in this metric. SDG&E uses a third-party administrator, ISNetworld, to house and verify the established SDG&E pre-qualification requirements for Class 1 Contractors. ISNetworld also serves as a communication portal for contractors to receive communications including:

- o New rules, regulations, and requirements;
- Reports from contractors on SDG&E specific incidents and hours that allow
 SDG&E to track and trend performance;
- A bulletin board that houses documents communicated to all connected contractors; and
- An action item tool for targeted communication to specific contractors.

ISNetworld monitors new and changing OSHA requirements and verifies SDG&E's Class 1 Contractors meet minimum OSHA requirements for written safety programs for the work performed, and grades Class 1 Contractors according to the pre-qualification criteria SDG&E establishes. The nationwide-level data captured by the third-party administration program is reviewed by SDG&E to standardize the pre-qualification process and is used for selecting Class 1 Contractors.

Historical Data: SDG&E began tracking this metric in 2017. This metric is one of the graded components used by SDG&E in its Class 1 Contractor pre-qualification criteria. Consistent Safety oversight of Class 1 Contractors will lead to consistent and accurate reporting of incidents. As provided in the D.21-11-009 definition, this metric measures the number of DART cases incurred for contractors per 200,000 hours worked (for approximately every 100 contractors). A DART case is a current year OSHA Recordable incident that has resulted in days away from work, restricted activity, or job transfer. The formula is: DART Case Rate = Number of DART Cases /

productive hours worked x 200,000. SDG&E utilizes a third-party administration tool to collect

SDG&E-specific incidents for the data reported to OSHA and included in Attachment B. SDG&E

will continue tracking this metric for inclusion in future Safety Performance Metric Report

submissions until a full ten years of monthly historical data is provided.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher)

Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering

Paragraph 6A.) – [Yes/No]

No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph

6B.) – [Yes/No]

No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in

place for this specific metric.

N/A

S. Metric No. 20: Public Serious Injuries and Fatalities

Metric Name and Description per D.21-11-009: "Public Serious Injuries and Fatalities: A fatality

or personal injury requiring in-patient hospitalization involving utility facilities or equipment.

Equipment includes utility vehicles used during the course of business."

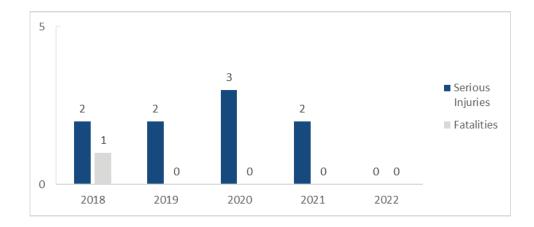
Risks: Public Safety

Category: Injuries

Units: Number of Serious Injuries and Fatalities.

97

Summary: Summary Chart of Public Serious Injuries and Fatalities Metric Data (Annual)



Narrative Context:

Public safety is a core value at SDG&E. SDG&E's safety-first culture focuses on its employees, customers, and the public and is embedded in every aspect of the Company's work. SDG&E conducts public awareness efforts to enhance the safety of its customers and the general public. These efforts are designed to engage with the Company's customers and the public to inform them about our shared safety responsibilities. Communication with the public promotes safety through a wide array of topics including, but not limited to, safety around Company facilities, messaging related to the Public Safety Power Shut Off (PSPS) program, information about gas line locations and downed power lines, the dangers of metallic balloons, emergency preparedness and working or being near electrified equipment or facilities.

SDG&E strives to continually educate the public about the dangers and risks associated with working and being around electricity. Bill inserts, postings to social media platforms, paid media tactics such as television, print and digital, social and out-of-home advertising, as well as proactive media outreach and warning signage near electrified facilities all serve to warn and communicate to the public about the care that needs to be taken around electrical equipment.

Without adequate communication and education programs, the public may not know how to safely dig on their property or how to keep themselves safe around company facilities that may be damaged during an event. Communication with the public also allows customers to be able to detect possible safety issues with their homes. Without adequate communications and education programs, a customer or member of the general public may not know how to identify a hazardous situation or how to prevent one.

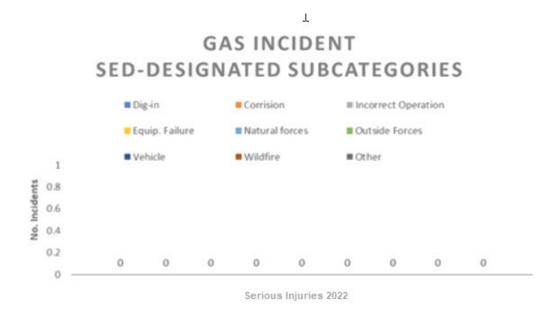
As stated in the metric description, this metric also includes utility vehicles used during business. To mitigate this risk, SDG&E utilizes the Smith System® Defensive Driving System as part of safe driving training for employees. The Smith System® was founded on the principle that most vehicle crashes are preventable if the correct driving habits are learned, practiced, and applied consistently. The Smith System® utilizes a series of interlocking techniques to prevent crashes. The concepts help drivers see, think, and act their way through various driving environments, challenges and changes that may exist regardless of where a driver travels or the type of vehicles he or she operates. Adhering to Smith System® Driving principles enables our employees to be better drivers and therefore aims to reduce SDG&E's employee and public safety risk.

Historical Data:

SDG&E's internal database captures historical data beginning in 2015. The accompanying Excel file (Attachment B) includes monthly data for years 2015 through 2022 for Public Serious Injuries and Fatalities. This metric includes data on a fatality or personal injury requiring in-patient hospitalization involving utility facilities or equipment. Equipment includes utility vehicles used during the course of business. However, the data provided herein does not include vehicle contact with stationary facilities or equipment (*e.g.*, car pole contact or car transformer contact). Contact with stationary facilities or equipment has not previously been reported and therefore is not captured in the accompanying data.

S-MAP Phase Two Decision states "For Metric 22,⁷³ Public Serious Injuries and Fatalities, we do not require the IOUs to report ten-year historical data using the subcategories for IOU reporting on public serious injuries and fatalities discussed in this decision. The requirement to report subcategories for this metric applies prospectively and should be reported for the current and future years." Pursuant to D.19-04-020, on January 30, 2023, SDG&E submitted a draft of its Public-SIF data to the Commission's Staff. On March 7, 2023, SPD informed the IOUs⁷⁵ that there were no changes to the Pub-SIF subcategories for final reporting in this Safety Performance Metrics Report. Therefore, using the subcategories designated by SPD, ⁷⁶ SDG&E's 2022 Pub-SIF data can be categorized as follows, as further represented in the charts below:

2022 Charts of Public Serious Injuries and Fatalities Subcategories



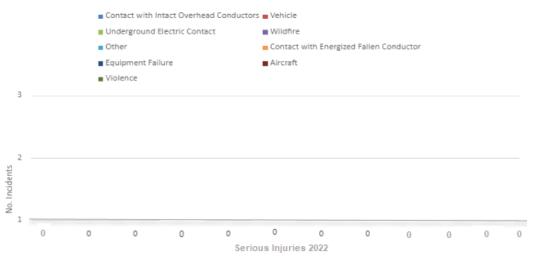
In D.19-04-020, the Public Serious Injuries and Fatalities metric was contained in Metric 22. The modifications contained in D.21-11-009 changed the number of this metric to Metric 20. See D.21-11-009, Appendix F at 15.

March 7, 2023 e-mail from Henry Sweat, SPD staff, to SDG&E representative.

⁷⁴ D.19-04-020 at 26, n.49.

SPD designated nine gas incident-related subcategories and nine electric incident-related subcategories, as reflected in the charts accompanying this Metric above.





Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

- Yes. 60% of SDG&E's 2022 Executive Incentive Compensation Plan and 34% of SDG&E's non-executive Incentive Compensation Plan is comprised of "public and employee safety operations" performance goals. SDG&E's 2022 Executive and non-executive ICPs include the following system and customer safety performance goals:
 - Wildfire & PSPS System Hardening
 - o Distribution System Integrity Miles Vintage Replacement
 - o Damage Prevention (Damages per USA Ticket Rate)
 - o P1 Gas Response Time (Minutes)
 - System Average Interruption Duration Index (SAIDI)

As stated in Section III, above, SDG&E's Executive and non-executive Incentive Compensation Plans are reviewed and updated on an annual basis. For purposes of this 2022 report submission, SDG&E references the incentive compensation plans in place as of 2022.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) – [Yes/No]

• Yes. As described above, performance goals in the "system and customer safety" category of SDG&E's 2022 Executive Incentive Compensation Plan comprise 23 percent of the overall 60% public and employee safety operations weighting and 14% of the overall 34% weighting of SDG&E's 2022 non-executive Incentive Compensation Plan.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

 Yes. SDG&E's system and customer safety performance measures are linked to all SDG&E director or above positions covered by either the 2022
 Executive ICP or 2022 non-executive ICP.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

- Sempra's Audit Services department reviews SDG&E's annual Executive ICP and non-executive ICP results and calculations. Each safety-related performance metric is well defined in the approved annual ICP plan. The annual ICP plan further specifies how each metric is tracked. SDG&E's ICP performance results are reviewed by the Sempra Audit Services department prior to SDG&E board approval.
- T. Metric No. 21: Helicopter/Flight Accident or Incident

Metric Name and Description per D.21-11-009: "Helicopter/Flight Accident or Incident: Defined by Federal Aviation Regulations (FARs), reportable to FAA per 49-CFR-830."

Risks: Aviation Safety; Helicopter Operations; Public Safety; Worker Safety; Employee Safety. **Category:** Vehicle

Units: Number of accidents or incidents (as defined in 49 CFR Section 830.5 "Immediate Notification") per 100,000 flight hours.⁷⁷

Summary:

Summary Chart of Helicopter/Flight Incident Metric Data (Annual)

Year	2018	2019	2020	2021	2022
Reportable Incidents	0	0	0	0	1

Narrative Context:

SDG&E's Aviation Services Department (ASD) is committed to upholding the highest safety practices and procedures for each mission type as assigned. ASD services include passenger movements, powerline patrols, pole setting, Human External Cargo (HEC), and other construction-related activities. SDG&E's safety-first attitude is integral in every operation and flight. ASD supports electric transmission, electric distribution, and gas operations with manned and unmanned aircraft (drones). Manned operations are primarily flown with rotary-wing aircraft and include scheduled powerline patrols, fault patrols, infrared camera patrols, vegetation management surveys, external load work, Light Detection and Ranging (LiDAR) data collections, HEC, and aerial assessments. In addition, SDG&E's ASD provides an air-rescue capability to structures and areas that are accessible by helicopter only and in close proximity to powerlines. Unmanned operations include pole-top and structure integrity assessments, environmental and sensitive area surveys, line pulling, LiDAR data collection, and post storm or fire damage assessments.

SDG&E's Aviation Operations Manual was developed to create a standard approach and language for SDG&E flight personnel and all contractors who may conduct operations on behalf of SDG&E. It contains information and instructions such as how flight operations are to be conducted and the priorities and approaches to those operations. SDG&E ASD is fully committed to

Given the low number of flight hours – well below the 100,000 hours per the metric description – SDG&E includes data based on the total number of incidents.

continuing the same level of highly professional services characteristic of manned operations and unmanned flight operations. SDG&E's mission for both its manned and unmanned flight operations is to coordinate safe and effective aviation services to internal and project customers requiring the use of aviation assets on SDG&E property. ASD carefully reviews subcontracted aviation asset suppliers and verifies they meet SDG&E ASD safety requirements for safe and professional aviation operations. When work in the SDG&E service territory commences, ASD ensures coordination and communication in planning and execution.

In addition, SDG&E's ASD is committed to a process of continual improvement in the safety and quality of our ground, maintenance, flight, and support activities. This includes aviation specific training of aviation practices and safety, periodic review of safety policies and safety objectives to ensure they remain relevant and appropriate. Other important initiatives for ASD include onsite observations of helicopter/field personnel, briefings by all contracted operators to pilots and ground support crew, and continual hazard identification targeted to mitigate the risk created by increased numbers of drone and helicopter flights.

Historical Data:

SDG&E began tracking data on helicopter/flight accidents and incidents in 2013. From 2013 through 2022, SDG&E has flown a total of 21,148 hours, and since 2018 has flown 9,496 Unmanned Aerial System flights. Monthly historical data for years 2013 through 2022 is provided in the accompanying Excel file (Attachment B) for Helicopter/Flight Accident or Incident as defined by Federal Aviation Regulations, reportable to FAA per 49 CFR Part 830. In November 2022, a SDG&E contractor experienced an-FAA reportable incident during which their helicopter contacted another airborne helicopter that was operating too close. Both helicopters were able to land safely, however the event resulted in substantial damage to the aircraft. Given the low number of flight hours – well below the 100,000 hours per the metric unit description – SDG&E includes

data based on the total number of incidents. SDG&E will continue collecting this data for inclusion

in future Safety Performance Metrics Reports until a full ten years of historical data exists.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher)

Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering

Paragraph 6A.) – [Yes/No]

No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph

6B.) - [Yes/No]

No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in

place for this specific metric.

N/A

U. Metric No. 25: Wires-Down not resulting in Automatic De-energization

Metric Name and Description per D.21-11-009: "Wires-Down not resulting in Automatic De-

energization: This metric is defined as the number of occurrences of wire down events in the past

calendar year that did not result in automatic (i.e., not manually activated) de-energization by circuit

protection devices such as fuses, circuit breakers, and reclosers, etc. on all portions of a downed

conductor that rest on the ground. This metric does not consider possible energization due to

induced voltages from magnetic coupling of parallel circuits. Metric excludes secondary conductors

and service drops. The metric is reported as a percentage of all wires down events in the past

calendar year. Separate metrics are provided for transmission and distribution systems."

Risks: Electric Overhead and Wildfire.

Category: Electric.

Units: Percentage of wires down occurrences.

105

Summary:

Summary Chart of Wires-Down not resulting in Automatic De-energization Metric Data (Annual)

	2018	2019	2020	2021	2022
Number of Occurrences	·]	Data collection	began in 2022	2	18
Percentage of Total Wires Down					17.82%

Narrative Context:

In D.21-11-009, the Commission adopted a new metric for "Wires Down not resulting in Automatic De-energization." SDG&E's interpretation and subsequent tracking of the new 2021 metric is where a wire comes down and the upstream equipment did not operate as intended by failing to auto-de-energize. Consistent with this Metric, SDG&E will not track back-feed or voltages from magnetic coupling of parallel circuits that may create on-going energization.

Historical Data:

SDG&E, historically, has not tracked this metric for wire-down events. A new outage auditing software and reporting system was necessary to capture the information required by this Metric and was implemented by SDG&E in Q3-2022. This system allowed SDG&E's coding team to manually capture and update all "Wires Down not resulting in Automatic De-energization" that occurred during 2022. As such, the accompanying Excel file (Attachment B) includes monthly data for this metric beginning in 2022.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) $-\,[Yes/No]$

• No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

• No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

• N/A

V. Metric No. 26: Missed Inspections and Patrols for Electric Circuits

Metric Name and Description per D.21-11-009: "Missed Inspections and Patrols for Electric Circuits: Metrics are calculated as annual number of overhead electric structures that did not comply with the inspection frequency requirements divided by total number of overhead electric structures with inspections due in the past calendar year. Separate metrics are provided for patrols, detailed inspections and separate metrics are provided for primary distribution and transmission overhead circuits. 'Minimum patrol frequency' refers to the frequency of patrols as specified in GO 165. 'Structures' refers to electric assets such as transformers, switching protective devices, capacitors, lines, poles, etc."

Risks: Electric Overhead and Wildfire.

Category: Electric.

Units: Percentage of structures that missed inspection relative to total required structures.

Summary:

Summary Chart of Missed Inspections and Patrols for Electric Circuits Metric Data (Annual)

	2018	2019	2020	2021	2022
Transmission Inspections	0.00%	0.00%	0.00%	0.00%	0.00%
Transmission Patrols	0.00%	0.00%	0.00%	0.00%	0.00%
Distribution Inspections	0.07%	0.01%	0.00%	0.00%	0.00%
Distribution Patrols	0.00%	0.00%	0.00%	0.00%	0.00%

Narrative Context:

SDG&E's electric transmission maintenance program calls for annual visual patrols and detailed inspections on a 3-year cycle. No electric transmission patrols or inspections were missed.

SDG&E's Distribution Corrective Maintenance Program calls for annual visual patrols and

detailed inspection on a 5-year cycle on the overhead electric distribution system.

Historical Data:

No electric transmission patrols or inspections were missed.

In 2018 and 2019, a small number of electric distribution detailed inspections were missed

that were primarily driven by a data gap within the tracking systems. Those detailed inspections were

later issued and completed soon after the issue was identified.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher)

Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering

Paragraph 6A.) – [Yes/No]

No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph

6B.) - [Yes/No]

No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in

place for this specific metric.

N/A

Metric No. 27: Overhead Conductor Size in High Fire Threat District (Tiers 2 W.

and 3, HFTD)

Metric Name and Description per D.21-11-009: "Overhead Conductor Size in High Fire Threat

District (Tiers 2 and 3, HFTD): Percentage of primary distribution overhead conductors in Tiers 2

and 3 HFTD that is #6 copper. Secondary conductors are excluded."

Risks: Electric Overhead and Wildfire.

Category: Electric.

Units: Percentage relative to total circuit miles.

108

Summary:

Summary Chart of Overhead Conductor Size in High Fire Threat District (Tiers 2 and 3, HFTD) Metric Data (Annual)

Percentage	2018	2019	2020	2021	2022
relative to					
total circuit	Da	ata collection be	egan in June 20	22	7.90%
miles					

Narrative Context:

SDG&E's grid hardening initiatives are intended to replace #6 copper wire with larger and stronger wire or to underground the infrastructure to reduce the risk of failure.

Historical Data:

Since this was a new metric introduced in 2021, SDG&E did not have historical data for 2021 and prior years. SDG&E's Geographical Information System (GIS) system is a live "as-built" system and SDG&E did not have historical GIS information to query in order to provide historical data for this metric. SDG&E began collecting and maintaining this data beginning in June 2022.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

No

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) - [Yes/No]

No

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

• No

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

• N/A

X. Metric No. 28: Gas Operation Corrective Actions Backlog

Metric Name and Description per D.21-11-009: "Gas Operation Corrective Actions Backlog: Total number of work orders generated to correct 49 CFR Part 192 non-compliances or Notices of Violation that exceeded the maximum allowable/allotted time frame to complete the work order in the past calendar year divided by the total number of closed or still-open non-compliance or Notices of Violation-related work orders in past calendar year, evaluated at the end of the year. Maximum allowable/allotted time is based on either applicable requirements in 49 CFR Part 192, or the utility's internal standards. Separate metrics are provided for gas distribution and gas transmission."

Risks: Gas Safety.

Category: Gas.

Units: Percentage of work orders past due for completion in the past calendar year.

Summary:

Summary Chart of Gas Operation Corrective Actions Backlog Metric Data (Annual)

2018	2019	2020	2021	2022
Trans Dist				
0% 0%	0% 0%	0% 0%	0% 0%	0% 0%

Narrative Context:

When SDG&E becomes aware of being out of compliance with 49 CFR or the CPUC General Orders, it is imperative that the situation be investigated, rectified, and learned from, as expeditiously as possible. SDG&E takes safety and compliance very seriously; all instances of non-compliance, either self-reported or identified by the CPUC, are brought back into compliance as quickly and safely as possible, by means of immediate field resolution, updates of internal gas standards, internal employee training, or the scheduling of corrective work orders. This metric measures overdue non-compliance corrective work orders (utilizing the timeframes outlined in 49 CFR Part 192 and SDG&E's internal standards for measurement purposes) as a percentage of total

non-compliance corrective work orders in a given calendar year. To calculate this Metric, SDG&E includes, among others, corrective action notices from CPUC Safety Enforcement Division (SED) Notice of Probable Violations (NOPVs), SDG&E Exception Self-Reports, and Gas Safety Citation Program SDG&E Self-Reports. The percentages are calculated using the corrective actions that did not meet the scheduled or required timeframes by the total NOPV and Self-Reported corrections. The monthly percentages are calculated using the months that NOPVs responses or Self Reports were communicated to the SED.

Historical Data:

Ten years of monthly historical data is included in the accompanying Excel file (Attachment B) for Gas Operation Corrective Actions Backlog. As noted in the Summary Chart provided above, there have been no backlogs as defined by this Metric for SDG&E.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

• No

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) – [Yes/No]

No

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

No

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

- N/A
- Y. Metric No. 29: GO-95 Corrective Actions (Tiers 2 and 3, HFTD)

Metric Name and Description per D.21-11-009: "GO-95 Corrective Actions (Tiers 2 and 3, HFTD): The number of Priority Level 2 notifications that were completed on time divided by the total number of Priority Level 2 notifications that were due in the calendar year in Tiers 2 and 3,

HFTD. Consistent with GO 95 Rule 18 provisions, the proposed metric should exclude notifications that qualify for extensions under reasonable circumstances. Separate metrics are provided for distribution and transmission systems."

Risks: Electric Safety and Wildfire.

Category: Electric.

Units: Percentage of corrective actions completed.

Summary:

Summary Chart of GO-95 Corrective Actions (Tiers 2 and 3, HFTD)

Metric Data (Annual)



Narrative Context:

SDG&E's Transmission System Maintenance program provides for preventive and corrective maintenance of transmission system structures, conductors, rights of way and their components. Maintenance is performed to correct infractions and to ensure public safety and transmission system reliability. SDG&E intends to complete all corrective maintenance by the date specified, default 12 months. However, a component/condition may be reassessed for changes in condition and corrective action may be deferred if deemed safe to do so.

SDG&E's Electric Distribution Corrective Maintenance Program has been established to repair any infraction that violates GO 95, GO 128, or SDG&E Standards within 12 months from the month the infraction was identified. If the infraction is in the HFTD Tier 3 and is related to fire safety, GO 95, Rule 18 establishes a 6-month repair completion timeframe.

SDG&E administers its own, strict deferral process for the electric distribution system, as allowed per GO 95, Rule 18. Each deferral request is subject to due diligence and is reviewed for reasonableness. Not all requests for deferral are granted. For purposes of calculating this Metric, infractions that have exceeded their compliance timeline and a deferral was not granted are included in the metric table.

Historical Data:

For SDG&E's transmission system, SDG&E's Transmission System Maintenance program requires completion of corrective action activities for Priority Level 2 notifications within the time period established in GO 95, Rule 18 unless reasonable circumstances exist that qualify for an extension of that time period. Reasonable circumstances or conditions that qualify for a "deferral" of corrective action activities may occur. In these instances, the annual percentage of corrective actions completed may fluctuate slightly due to the adjusted due dates or work being completed ahead of schedule. Additionally, while SDG&E maintains complete maintenance and inspection records, priority level 1, 2, and 3, coding did not begin until 2016. As such, historical data for this metric is only available going back to 2016 and is included in the accompanying Excel file (Attachment B).

SDG&E's Transmission Construction & Maintenance department has a single database for record of findings and work management, which includes records of steps taken to resolve findings in timely manner. However, this work management database does not lend itself to easily producing reports for new or modified metrics. Data was manually gathered to report on this new metric in the

2021 SPMR. For more efficient future reporting, SDG&E commenced development of an automated data collection and reporting process.

For SDG&E's distribution system, there are instances when the construction team is delayed for a reason allowed under GO 95 (e.g., permitting, environmental, access); however, a deferral was not requested in time. One example of when this oversight has occurred is when a job was mislabeled within our notification tracking system. Another example is when a job was incorrectly cancelled. Cancellations can occur when a repair is being driven by the results of a pole loading calculation and there is no visual issue identified for repair. SDG&E has a quality control process to identify when an erroneous cancellation has occurred, but such identification may sometimes occur after the completion date established under GO 95.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

• No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

- N/A
- Z. Metric No. 30: Gas Overpressure Events

Metric Name and Description per D.21-11-009: "Gas Overpressure Events: CPUC-reportable overpressure events are those that met the conditions specified in GO112-F, 122.2(d)(5), but reported on same frequency as the other SPMs. Separate metrics are provided for distribution and

transmission systems. The metric measures both gas operational performance and the integrity of gas pipelines."

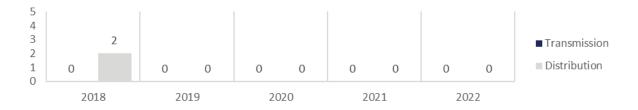
Risks: Gas Transmission and Distribution.

Category: Gas.

Units: Number of occurrences.

Summary:

Summary Chart of Gas Overpressure Events Metric Data (Annual)



Narrative Context:

A key safety component for all pipelines is the determination of a pipeline's Maximum Allowable Operating Pressure (MAOP). MAOP is the highest pressure at which a piping system, or segment of a piping system, is qualified to operate safely, based on design and pressure testing, or design and operating history. The MAOP of a pipe segment cannot be greater than its Design Level. The MAOP of a piping system is equal to the lowest MAOP of any segment of that system. It is vitally important not to exceed MAOP as this can lead to equipment damage, leaks, and dangerous incidents. Each piping component and segment of the gas transmission and distribution system is designed and operated based on this concept. The maximum pressure for a component is determined by its design and characteristics, and it is verified by testing. The component with the lowest MAOP determines the maximum pressure for an entire section of the gas system. Control systems are required to maintain pressure at or below MAOP, and that secondary pressure relief or pressure limiting devices be installed to restrict the operating pressure in case of a failure in the primary control system. These pressure control devices must be inspected and tested annually.

A CPUC-reportable overpressure event is any event where the failure of a pressure relieving and limiting station, or any other unplanned event, results in pipeline system pressure exceeding its established MAOP plus the allowable build up set forth in 49 CFR §192.201.

If the system's	
MAOP is:	Then gas emergency incident is reportable
	when system pressure is greater than:
60 psig or more	MAOP plus 10 percent, or a pressure that
	produces a hoop stress of 75 percent of
	SMYS, whichever is lower
12 psig or more,	
but less than 60	MAOP plus 6 psig
less than 12 psig	MAOP plus 50 percent

Quarterly Reporting: Incidents where the failure of a pressure relieving and limiting stations, or any other unplanned event, results in pipeline system pressure exceeding its established MAOP plus the allowable build up set forth in 49 CFR § 192.201.

Annual Reporting: The number of events in which pressure in any pipeline facility exceeded the MAOP by 50% or more of the buildup allowed for by 49 CFR § 192.201. For any transmission pipeline facility where the Operator applies the provisions of 49 CFR § 192.917 (e)(3) or (e)(4), any increases above the maximum operating pressure must be reported. Also, for low-pressure systems (*i.e.*, inches of water column pressure), all pressure increases above MAOP must be reported. Increases in pressure above MAOP resulting from planned, designed, testing, or other intentional operations performed per procedures or process established by the Operator are exempted from this requirement. For purposes of reporting, "events" includes each occurrence of over pressurization that develops between over pressurization being noted and maintenance being performed.

Historical Data:

The overpressure reporting criteria established by GO112-F became effective in 2015. However, regulations requiring external reporting of this data were not enacted until 2017. SDG&E

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

began tracking this data in 2017 in compliance the new reporting requirements.

• No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) – [Yes/No]

No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

• No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

N/A

AA. Metric No. 31: Gas In-Line Inspections Missed

Metric Name and Description per D.21-11-009: "Gas In-Line Inspections Missed: The number of gas pipeline in-line inspections that missed the required reassessment interval, according to the relevant intervals established pursuant to 49 CFR, Part 192."

Risks: Catastrophic Damage Involving High-Pressure Pipeline Failure.

Category: Gas.

Units: Total number of missed inspections.

Summary:

Year	2018	2019	2020	2021	2022
Missed Inspections	0	0	0	0	0

Narrative Context:

As discussed for Metric No. 6, gas transmission operators are required to assess pipelines in HCAs at a minimum of every seven years and covered non-HCAs at a minimum of every ten years. Transmission pipelines within scope of the TIMP are assessed using In-Line Inspection (ILI), Direct Assessment, Pressure Test, or other appropriate methods identified in 49 CFR §§ 192.710, 921 and 937 and remediated as needed.

Historical Data:

The number of gas pipeline in-line inspections that missed a reassessment interval is a metric that is managed under the TIMP. SDG&E provides annual data for years 2013 through 2022 in the accompanying Excel file (Attachment B).

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

• No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

N/A

BB. Metric No. 32: Overhead Conductor Safety Index

Metric Name and Description per D.21-11-009: "Overhead Conductor Safety Index: Overhead Conductor Safety Index is the sum of all annual occurrences on overhead transmission or primary

⁷⁸ 49 CFR §§ 192.710 and 192.939.

voltage distribution conductors satisfying one or more of the following conditions divided by total circuit miles in the system x 1,000: 1) A conductor or splice becomes physically broken; 2) A conductor is dislodged from its intended design position due to either malfunction of its attachment points and/or supporting structures or contact with foreign objects (including vegetation); 3) A conductor falls from its intended position to rest on the ground or a foreign object; 4) A conductor comes into contact with communication circuits, guy wires, or conductors of a lower voltage; or 5) A power pole carrying normally energized conductors leans by more than 45 degrees in any direction relative to the vertical reference when measured at ground level. Separate metrics are reported for transmission and primary voltage distribution conductors. Secondary voltage conductors and service drops are not included in this metric.

Risks: Wildfire, Transmission Overhead Conductor, and Distribution Overhead Conductor Primary.

Category: Electric.

Units: Number of occurrences per circuit mile.

Summary:

Summary Chart of T&D Overhead Wires Down including secondary distribution wires and "Major Event Days" Metric Data (Annual)

Overhead Conductor Safety Index - Transmission	2022
Rate: Number of wire down occurrences per circuit mile X 1,000	0.00
Total Transmission wires down (excluding MEDs and secondary	
wires) included in metric #1	0
Total T&D circuit miles (excludes underground circuit miles)	8,411

Overhead Conductor Safety Index - Distribution	2022
Rate: Number of wire down occurrences per circuit mile X 1,000	12.01
Total Distribution wires down (excluding MEDs and secondary	
wires) included in metric #1)	101
Total T&D circuit miles (excludes underground circuit miles)	8,411

Narrative Context:

The Overhead Conductor Safety Index Metric was adopted by the Commission in D.21-11-009. While SDG&E keeps thorough records of inspections and maintenance performed

on the electric transmission and distribution systems, those records are not coded and tracked at the level of granularity required for this metric. SDG&E began retaining distribution circuit mileage as of June 30, 2022, and transmission circuit miles as of December 31, 2022. The mileage shown in the above table represents the total transmission and distribution overhead circuit miles as of December 31, 2022. Furthermore, as noted in SDG&E's 2021 SPMR submitted on July 29, 2022, for this metric, SDG&E had provided written comments in R.20-07-013 (the docket in which the SPM were developed) that the metric definition as it pertains to wires down conflicts with the OEIS (criteria 1-3) and contains elements (criteria 4 and 5) that may not be readily measurable. SDG&E continues to believe that the essence of this metric aligns with the wires down definition, as contained in Metric #1.

Historical Data:

As discussed above, the data sought by the Overhead Conductor Safety Index Metric adopted in 2021 was not historically tracked by SDG&E at the level of granularity for this Metric. SDG&E began tracking circuit mileage in 2022 and has presented the Overhead Conductor Safety Index using the wire down data presented for Metric #1 in this Report for 2022.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.) – [Yes/No]

• No.

Is Metric Linked to the Determination of Individual or Group Performance Goals? (Ordering Paragraph 6A.) - [Yes/No]

• No.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.) – [Yes/No]

• No.

Bias Controls: If any of the above are answered "yes," provide a description of bias controls in place for this specific metric.

• N/A

Attachment B

[Native/Excel file of 10 years of monthly historical data, where available, for all applicable metrics served to parties of R.20-07-013, A.21-05-011 and A.21-05-014 (cons.), A.22-05-015 and A.22-05-016 (cons.) and made available upon request]

SDG&E S Attachme	afety Performance Metrics - 2022 est B Summary																									
Maria P	MANTHA	nages	Note thoughts	-		na	~	~ ~	ŀ		Aug	44	-1.	1	-	A4	-	Apr.	way	nes.	m,		-	-		-
	Security of Europe (Sel Surface State See) (1984)	nam.	Author of the least where a referred transferrance of printing absolute an electricity of the least of the le	Autoridaes Barraces					T							~								-		
	Teaching & St. Photo (1981) Subject this load. This had been deep fact.	num.	Conference of the second conference of the sec	Author of any discounts (southing being Authorized annually distributed and but southing					t							_										
				Martine or constant for an always from the parties of the parties			1	+	t	+			H		+	H	H									
	mater margins, Reporte (seeings methy)	Harris	dependent untue souds. Entergency soldsteller mittable, at leithe area, arguming from the rate and solds rates descrip to the attract adopt before. He date area to the corre- fler average that and deather than the first the product is increment, a calculate in the Enter the Enter a support of the Correct and a calculate.	a unargon, una	17.8	0.20					MA.	***	na t			-					- Oak					u.s
-	martin transport, Response (search) arrival	ename.	program, set forms from the tree of confidence to the time or oppositioning or parties for supposing sended across. Imaginary confidence includes and confidence opposing from the confidence than therefore the contract wide for providing the confidence of the confidence and the contract wide for provided a contraction or contract describes the configuration and distinct that could be provided a contraction or and the describes the configuration and distinct that could be provided as contracting as	prior a specification repetition in repetition recently a selection resets in a consequency order.						nen.											20.00					
_			Acting the editation of the supplemental desiration of a single and a	Martine or trade the analysis of the parties of the		П	П	Т	Т	Т	Г	П	П	Т	+	Г	Т	Г	П		Г	П	Г	Г		П
-	Name (Newgord, Response) Name (name)	Harris	regioning from the self-self-self-self-self-self-self-self-	a unequo, una			B.W					***	au i					2.0	200		***	200	ur		***	
	more megas, hopeas (notecons)	ename.	employ y services have the role of embours to the time a separational of service for separate amount assets. Employ conference conducts and conference appropring from the color and only to the foreign or the ordinary color foreign part is destroyed for a color time and realize the cold be provided to recommittee.	prior at a publishment companier when to expensive receiving a set when receive to existing conjugate to the second con-																						
	to favor local	Name .	Administration (1904) (in a apparatus information, set as a reason. The market of the monterior arrows, reported to the markets of the monterior and the second and the second arrows are also as a second and the second arrows are a second as a second and the second arrows are a second as a second arrows are a second as a second arrows are a second as a second as a second arrows are a second as a se	Action deposits													r	ŀ		,						
	na ng a (name)	-	For gas, it gas it gas informs any derivage properties experiently that tracks in a legal of Experiment of extensional gas forming as a model of a second on the latest filtering about a follow, in the gasty legal on a demand consumply consistent of the filter all the gast public contains.	Anaphen													1.04		***	***		***	2.07			
	na Tanasanas	_	The market of the parky parky to the park to the state of the park to the state of the parky to	Na national Adjunction and incommon decouplings											Н	_	_	_	ш				_	_	_	
	na non-mperse prose meri	te.	etti, ustanin. Harrika Francisco ppetioringone eneri, kyrine espetio ja juri Harrika Francisco statia, tios Musika la tios spetios	tor national research to the																						
-	Sa Kara Tapa Na Janar Janar Janar Aga Na Kara Tapa Na Janar Na Jan			Not notice of the of important polaries of securities making the or other than to make support to mp to fine of an in making than						200					+						- 22					
	that it file has Market From Marin (arched)	-	Selection of the Part of the companion of the control of the contr	Annu e mode, septed to mp to fine of porte to montator them.																						
	that is the best Mediat Princ. Services (Health).		entres. No description describes the makes that and the product of	parte montanes terres																						
	reas Assert Manager (marting)		The tree could have properly special as a read ten	Action of the base of the same per types reparted																						
			meng the set nature for a make to expensive to go when hypertening or perfection for the time of setfection is the time again and a symmetrie (or perfect for organic perset some thoughts) with one conduct a setfection	the time or remain that a facilities topic actions or a quartest first expension takes to expensively recovering a set which																						
			part is describe the except the sold refer the sold be provided in recommon as defined in the First Fig. or application information, set as a factor. Hering time and method their in thinks to respect to one to a position integrally.	Na State of Strategy Services																						
-	na Kragon) kojana Aungo (row)	-	deliberation from the trace of confinence in the story again under representation for purplied from regionship arread mosts. Houghony senforation considers of confinence engineering from this sale and sole made attempt to the unitracy solely features. Note that and the decoration for a range trial and makes trial visible by provided in construction as	Approximate or a quarter from expensive teach to expensively recovering a set unless results it an attemption; artists																						
			Administration (AP WEST) (is a supportant internation, as as a factor. Assume that and method there is forced in a required on one is a go, indeed unanguary particular from the time of definition in the time a gas union expression in an authority of the consideral course and communities to the observance consideration and confidence and the consideration of the consideration and the observance consideration and confidence are the consideration of the consideration and the consideration consideration and consid	Martine or make their sections Approximate or a quarter for expense																						
-	to Engine Aspeni Asto (mill)	-	engraning from their sold, and sold made attempt, to the unitities' under, bettern. We do near the design time and made on the last to provide in recomment. An additional test of the design time and made on the sold to provide in recomment. An additional test of the design time and made on the design time and the design time	made it of attrasports after																						
_	na Krajonj kojima Akika (cras)	-	Marija 100 od redne rite in frakti in tegele in dra 10 go interdirentejeriy Delivera fran Nevillad delivera in Nevilla ja santa njegorista kar Japania fran popula grand santa in majany sehita mala santa delivera Japania frantzi sah sah sah mak disapi untu untur sahiji batun. Ne dan Japania frantzi sah sahiji nak disapi untu untur sahiji batun. Ne dan Japania frantzi sah sahiji nak disapi unturuntur sahiji batun. Ne dan	No line or more than the service Representative or a quarter first expense time to require where several a service time is an arranging one:																						
1				Action described company burder																						
_	Nation to the Baselia Assessment Arternal		the after a constraint, companied as a principal of a larger fire confidence of manage and principal of the parties fire confidence and depend or only registeric copies of reportions as affects any conducting the entity.																							
-	na Ppatria Theracia: Harristy rapinar(Miss)	-	 Introduced pipersecrepantal around, by other expense (etc.) and principle of the forces pipersecrepantal around, by their expenses; International pipersecrepantal around, by their expenses (etc.) and paterning of the forces of the pipersecrepantal around, by their expenses (etc.) and paterning of the forces of the pipersecrepantal around in other baselons. 	Annage Security and	H	_	_		_	-	_			_	Ŧ	_	_	_	_	_		_				-1
-				MIT THE THE BUILDING			1111		Τ.		1.70	.~				1.00			110					1.0	1.0	
-	engingan trap danay kannonin mid transfer (mitt) kena (a mad ana)		metri kan munimpanina di se keladi di data mendada apina selating di dapi dang tan wata angle majuri Norte di Raji a da Karalay anthan saman.	ANT YOUR THE BUILDINGS	H	ш	_		_		_	ш	ш		+	_	_	_	ш		-		_		_	Н
H			New of SM Amen's programs; is nativalent using the female shador of SM. Achier soon of the graphiques of American programs from a solicity, when SM. Achier constitutioning the artificiality of comparising in the Satural control controls in 1991. Employment controls of a reflectively comparising in the Satural control control controls.	Author F18 Athermos strong criphips a expensive papers from without	H	П	_	Т	Т	Т	Г	П	П	Т	+	Г	Т	Г	П		Г	Г	Г	Π	Г	П
-			The series of the opening of the product of the confidence of the control of the confidence of the con			-			1.					١.		١.										
			Er sein S. Be a suggestion for opposing suscepted to the SEA Actival Rate for comparation programs, all all the comparations of the SEA Actival Rate Season (SEA Separation) support and actival selection of the Seaforms under code.										Н			1						ĺ				
			And of M. Americal prophysics is solven using the formula standar of M. Americano, strong corplanger is ART/ART in representation solvent, when M. Americano standarding for artificiality, managed by the Americano contents in pill procephinal relation and within a source printing for the Americano contents in pill procephinal relation and within a source printing for the Americano contents of the Americano contents of the contents of the Americano contents of the Americano contents of the Americano contents of the Americano contents of the Americano contents of the Americano contents of the Americano contents of Americano content	Author F H Abur van arting original is anijem/original hara antan					_		_				T	_		_	_		_	_	_	_	_	
~	tion of terminal regions or functions (set) to that if reproperly (second new		If a strop two conjunctional a applicable, substantiarly control construction controllabelings for assuming the deliver, the selection year use that individually appearing the control of a serie, the conjunction is and other delivery of a confined that in parties the finding controllabeliness thanks, it force outputs from its confinedings for counting the deliver defines and why it choses thanks. It force outputs from its confinedings for counting the deliver defines and why it choses thanks.																							
			As a conjugate that opening summer to the NY Actual has for conjugate a popular, of determined and process NY Actual has become other opening superiors under parts of the technique with mate.																							
			Apple of the American Statement is indicated using the Service Statement (the American Statement), and the Service Statement (the American Statement) and the Service Statement (the American Statement) and the Service Statement (the American Statement) and the Service Statement (the Service Statement) and t	Author of the Artist cases arrange contraction.																						
-	And of the Anna (Instituted (Institute on)	mpone.	decisioning condesits where is M. Americal, the other long was the cheffed for supporting the department of the condesity of the condesity of the decision of the cheffed for the cheffed for helds; the collection fields; it must appear than its restricting yet is resulting 4th action. When a set why it it must be an a support to the condesity of the condesity of the Action for the company of these transitions and a state of the decision of the Action for the Action for the company of the condesitions and the condesition of the Action for the Action fo																							
			AMERICAN SERVICE SERVICES AND S	Author of the Artist cases artisting contraction a MR (MR) contraction have a solution																						
-	No. of the Article (Section Co.)	-	pering has experimental a suprimental purchasement, content constantion mentionings for excessing contents where a fit increased, the white, rough and the increased to supering min- derness. For content, upon to superint the size of the content was upon a submitted and the size of the pulsary for contents of the first angle on the content and to superint the size of the content of the size of the																							
			When a set why it these is to see a supplemental reporting experience in the SM Artist from the compaction purposes, of settings of all also appeal SM Artist Show that is to set in the compacting corporated in setting of the first Continue and the continue and	Activity restriction																						
	And of the Street, Straphology (security, sec)	epres	pour entire; originare a referencierante from sentre; efecte a Minodoni, e din nos enados cuelto del constitue habito a speriate 10.	ergingen i errej Minjurgingen hann werken																						
-	And of the State of S	epres	poin artistig originizati a PRESTRICTURA Train, section affects a Millionistic, in this four which has earlied that could have believe a squareful to the	ergingum a errej Minjurgingum Yaun werken																						
			pour arring comment is despited, forest the fluor active, where a set content, or the new arring the extent that could have been expended in the forest of the content of destribution using the thirties, a set to inflore a country through \$ \(of the expension of a product, independently arring through a \$ \(of the expension of a product, independently arring content in the through the \$ \(of the expension of a product, independently arring content in the through the \$ \(of the expension of a product, independently arring content in the through the \$ \(of the expension of a product, independently arring content in the content in the \$ \(of the expension of a product, in the content in the cont	action of Marine Journal of State																						
	And all the Research (contracted) (contracted)	manus.	Accounting the Resident of the Latting Color, was the Audited for appointing this colors of a Latting Space of the Latting Space of the Latting Color of the																							
			Jud point information during towns burnerful Received M (personal)	Author of the Property was already contracted in Allenta (contracted from																						
-	tion of the Resident (Section 10) (second 100)	-	destrict any first being all transferrer source flows. I also for the implemental spinate, substituted, professional continues our manages for accounty for flower, the only increase the notice of experting the source of a state of the spinate flow the spinate flow the spinate flower.																							
			Pain France Male, I may expect his in following for haring of finance after, or writing it there is near it. It is suggested operating becomes to the finance of their postments, of unitarial and provide information abouting issues between the finance of postments;																							
			Solet Face Hash Assig, Successful and York School (successful Assistance and Michigan States and Popular Shar reader pile for the Array Solet San Control and Array (Solet San Assistance A	AND MET ALL																						
-			Main Adv. map during from their and has be finished, became make statement and an incidence of the second species for motion pile took for an extraction and activity. Main finish	NO. SEP AND																						
-	Section to the Association of the Section of the Section (Section (Section of the Section of the Sec	maren.	a solution of the state of the																							
-	netr femerapes concerns beneat spins - moting	mpone.	is favory or partner injusy requiring in partners represent activity united sections. Apophics Apophics reliable, utility whiches and favory the course of business.	Carrier spec																						
-	nativanna spisa astrodra (nativa nativ)	mpress.	I facing an passed oping sequency in particular particular making with facilities of apopular Apopular solubor within whites and Adrig the count of business	Autor d'Auton																						
		water	Separation of the separate last character as in securior	Action of an internal contents for behind of action below that I formate the format per sequentially format of equations action of an internal format.																						
	BOLEW IS SURE - LINES SCRIPPING SOURCE		Participated Applications of the Control of the Control of Control of the Control of Con	Arrachage of when dead concretions		П			Τ		Г		П	Т	Т	Г	Г	Г	П							
L	<u></u>	_	their but consider provides are granted than to coloural vallages from trappart is supplied provided or sets. More contribute processing valuations and activate steps that states is approved as a provided for transitional and activity. They was interesting upon Market and provided for transitional and distribution systems.	<u></u>	Γ.	Γ.	.	ŢĮ.	J.]	Γ.	Γ. Ι	ĽI.]	Ι.	Ι.	Ι.	Γ.	Ľ	_	Ι.	Ι.	Ι.	Ι.	Ι.	T. I
-	MILES OF SURE A MINOR SURGEST STREET	-	Mattheware bytes the name is advant on the name of construction of one discu- tages. If the percentage of the data to the land is advantage of a thin sealing about the construction of the name of the data to the construction of the advantage of the construction of a decrease conductor that need not the ground. The name of the construction of the data to the construction of the ground. The name						Γ	Τ.			T		Τ.											
1			produce or an experimental production of the pro		L	Ш		1	L	_	L	Ш	Ц	L	1	Ĺ	L	L	Ш		_		L		_	Ц
	Wasterparker.		the compay will the important hapvarry supremates distance with number of numbers distinct software, with important date of the part and other part beginned to their a six probability for the part of the part o	THE RESERVE THE PROPERTY THE PARTY OF THE PA																						
	Mount repair do und flutes for flutes stocks Fortung fluteshion. Mount repair de		Sections subtine extents from subtine to see any other for any other for formed department from so selected a softwarf notified in entire of extent of the for formed in the formed or compy with the purpose began you procured. Any other section of extend extent intention with requirems due of the part section you proper million or product for extend or the complete and or other part section you.	Anadago é matura de masé repetir sietas tratas repetir stantas.	T					10"					T											
**			product for your plants due and the mount carried mode. William point traperly which this fragment of period as perfect out the "fraction" which to contra audit and a franchismic, seeining protects done, operator, line, per-												L											
			environ. But de las compty de la conquente l'appendix l'appendix popularies autorità de la compty de la conquente l'appendix popularies autorità de la conquente del la conquente de la conquente del la conquente della	Maria Salar Special Service.																						
1			traperay, "otion to the frequency of period as quantum rate and "distribution" often to parties about a set a characterism, marring protection become, requirement, train, pales, the	Anomalo d' mahoro ha mout nojano	H										+											
~			Any control field of an empty will be expensed began to specific specification. Asked by that control of marked district attributes with reportion, the in the year pricedly year to appear to brone as an ambient of parts, all control payments. Separate and the set provided by price plantification of an empty and payments are parts (Separate). Asked the first the payments of partition and produces are con-	A STATE OF THE PARTY.																	100					
1			Who had a process with a transformer, with the process device, experience, and the process device, experience, and the process device, and the process device an	Annalige states and amenican	\vdash										+						No. No. No.					
-		marrie .				_			-			_		_	L	_						unu				
_		_	A THE RESIDENCE OF THE PROPERTY OF THE PROPERT	companies of the part handler year	_									١.				-	1		-			-	-	1
1			of after approving agreement is directly fact that perform all of a contract of a cont	Annalis of son one parties																						
-		-	Note to copper the work of the decision to be commissionally of the con- trolled or other parts of the copper of t	parameter part to make your		ı	9				9	3				3	3	1	1			3	9	1	1	1
_	man common more have a seal and processes because	-	Reprint Cells on producting a distribution or go territories and per- mitted and specific for tender or strong control and cells of the con- trol distribution for tenderate of fining conditions for an extension of the	American di sersona ames complese		Ч	_		L		۲	닏	ч	٠		Ļ		۲	¥							¥
-		riserre.	Control your in from a unit is, 1970 in control with our fit has it you can, it is a property of the control of																							
~	The second secon		The should be a considered on the should be a should be a supported by the should be a sho																							
_	en avvenue e pero lans von é eu al anapero lambé.		Market Agency (Agency Tomorrow of Principal Conference for an analysis of the Agency of Tomorrow of To	Arramage of services where completed	10.01	11.00	e-sen				1.785	nan.						180	***	1.61	1100	1.00%		110	100	
\vdash		-	The state of the s	Anadaga di sanaha anas sanjana	Ľ	Ш			L	L	L	Ш	Ш	1	+	L	L	_	Ш		L	L	Ľ	Ľ	_	Ц
-			entretor per el Pero i cuid el 1970 i consiste pell del 18 des de processo. No propued noto: characteriste indicatos tro-però for servicios en este reconstru- cio alcono los higorios fortos en procesión fortibulos activismosses que co-		L					****											man					
-	Na Baryanus Nata - Nautonio (Nathy)	-	Proceedings by place in Principal value and precisive destinates from the Principal value of the Conference against all a section and of \$100, find a principal value of \$100, find a principal value of the Conference of the Confe	and a second																						
-		-	Paradesia Agusto i Prin ingeninto compresso dell'interiori finari fiar del Paradesia agentiale actività di serio (Esp. del agentino actività finguistre di Paradesi 1966, seponte metto un promisto del mettodo e all'interiori considera agentino del metto manusco dell'ago agentino perferense and de mitiglia y funcionalista.	Notice of Assessment																						
-	to topour test, metanopany	_	Mandante (place 1990, reprints compressed contract the final for the final contract specified contract, and object, but approximate the purpose with other 1994, reprints more any proximate attraction and decreases upon	National Assessment																						
-	na furjecus taris -forfuto (coal)		And the contract of the contra	National accessors																						
-	NA T-100 HORSE WOOD (NOTE)	-	the form therein had go operator parameters and the integrity of go operator. The months of go papers in the top protect, the trace if he integrity of go operators are contained at the content of the	Name of Street Squares				Ŧ	f		f		f	f	Ŧ	f	Г	f			f	f	f	f	f	f
	na nonemperato Mostipolisi)	-	The norther of gar apprises in the stage prison that should the support to constant	Author of House Reports to	٠	٠	٠					l.		Ŀ				٠	٠		Γ.		Γ.		٠	
-		-	more accoming to the colorest reasons accommodate particular for the first factors.		L																					
-				and the same of th					-	a becomiste											Note that the	natio				
	martine street street street street		en e	Author of an among	\vdash										+											
-			Missing continue declarate that could risk in the space is 1981 (in the same of the same o						-	Non-services											No. We had	notes				
	l																									

Attachie	iafety Performance Metrics - 2022 ent B Summary																			
Water	20020	T name	NAME AND ADDRESS OF THE PARTY O					I w I w I w		w w w						. I m I m I m		. [[]		
	Name of the Printer Carlo Control State State (1998b)		Auchor Francis akes a visite tromism a proxy destala condens a nest, e anno most, arbita tan nominarparano sono da guanta v tropo dipit a sendens a moderni regale ensociatora e a decesar	Action of any displacement																
١.	Technical & Hallano (Mr.) Bulled Block Box. Bugs Fee		The second second section of the second seco	Author of any distriction by Country Mayor Authority and Authority Authority Country Authority Country Authority Country Country Authority Country Authority Country Country Authority Country Country Country Country Authority Country Country Country Country Authority Country Country Country Country Authority Country Country Authority Country Country Authority Country Country Authority Country Country Authority Cou																
\vdash	No Jeans	+		Na sea or construction of a section of					HH									+		
	more margins, hapma (samp more)		All franchister for the old definitions to the time a symmetries for qualitative expending creationals in marginary unfoldered creates at letter does arguming from the code and in time decorate for the unitary for the product of controls of the code and its decorate the arrange time and franchiste time and to produce a control on a definal or the time.	especialistic receiving a self-advert receive in an intergency solver.		*** *** ***	~													
			And the description of the control o	to the in made the enteriors of the second o			-													
Ľ			ear to America the exempt the and retain the challes provide a received a defeater and the E state (c. a. agreement observation, let a. a. turns.)	fu ma monato facilitati ma					—											
-	mente marginos, temperas (mentes mentra)		program y services have the tree of early and the tree is approximate just specified the supposed service areas. Since you confirms conduct at services reprinting front to the and who had service to the artifact and provides. The Annual ways a point to the content that and all the artifact the artifact and analysis or contents as	anne a parterior repeat vien o repeat de recent qui sel atentimento e e receptor, ester																
\vdash				No tro in mass for a serious proces a perfection operations				-	+											
-	rects the group factors (notice only)		parties for expense; arrest some margany verticens conducted self-cution regarding teachers and and note than the strong on the artists of subspicious. We do not and it document the average that and reduce that and and to provide a constraint, as defined a first red of that it pass augmentation for the self-cut of the authority.	especialistic contenting a soft which resorts in a consequency color.																
	to gran (web)	ram.	The state of the s	Authorid garant Facultiscul Millards par Agric par 1988																
	na ng a (nam)	-	For your argue and you into the and, the heapy proper or aspectable for leading to a special or expectation of intelligenced you form you a countril an account on. Accounts factorized special solders in this party leg or in terrupy countrily contains other than the winty or pointy contains.	- Angelia					***											
1			The market of all party participants and a state of the s	An author of the purpose and an incurrent processing former																
L.	to the transfer transfer		of accession is the purple against develop research, services after that the selfin, or a selfin, contactor. "According if the contactor profession according by the explanation in East																	
	tea Europe transporter provincia	100	And the Processing Species required a stand in the conjunction in Law decrease of the Conjunction of the Conjunction of the Conjunction in Law decreases of the Conjunction of the Conju	And the second to the second to the second se			7				10				100				n 10	
-	that is the boundate from . Many (morthly)	-	The first and a series of the control of the contro	per for the television of the second or the																
	Mark The San Hasher Filter - Services (Hosting)	-	Marie The State of the State of Control o	True II Strade: Septed to my No You of po for Workshop School											11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1					
-	Marie The San Hashar Films. Morrors (History)	-	And the second section of the		-															
-	Treatment from	-	Manage time are maller time to trickly to trapped an error to a ground strangering	For this in constant factor but factor																
-	na Program Augusta Annah (marke)	-	And the state of the transit of antiference of the transit on a contract representation for quarties first expended arread active. Benegative, with under contains in influence requiring state acts and and not have described to the uniform under features. We do not contain determine the exempt tritle and makes true shall be provided in recomment as	personal control services of the services																
\vdash			Marian sin sin P 1932 () as apparatus statement, tal as a faith. Marian film and marian since in minior in requirement in a gas action representative (or performancian film time of artification in the time a paratum representation (or	For the common flat a technical Reproductive or a qualitative expense													\vdash \vdash \vdash			
-	na Maganij Rojanio - Aango (errar)	-	equitable from topology arrival acuts. The grant perfect was remain and institution registering from this cuts and cuts made should, to the afficient valley features. The data should be discovered for a congression and contact the procedure of construction or particular acuts and it will be a congression of the contact of the act in the con-	made it an amaginary mine.											100.00				14.07	
			Acting the extraction from a minor to register order to a gar about integral serious from the time of serious as the time a parameter specialistic by parties for register; are all some transports with ones revolute of metionisms.	the time on strates there has become depresentative or a quartest first expension taken to expensionly recovering a set which																
-	the transport designs of the property	-	Segment from the last and sold made strong to the unitrary under feature. We do not not find the stronger than and makes that that the fine day provided in recomments as additional than the close of the comments as additional than the close of the comments are as a feature.	Treats in an amorphism artists														- .		
-	na Program Reports - Meller (cross)	_	Marings Time and marine time is it times to required an over the agest information of the North Time The Time of antiferation in the time ages across expression to a particle from capacitied amount management in the section consideration and antiferation registering from time and with time times around to the wintow," under the times. The Alexander of the Contract of the contract in the strength on the wintow," under the times. The Alexander times are the contract of t	No trace is made. There has been de- dependent on a quarter for expenter than to expend the second a service.											_					
Ē		1	AND THE ARCHITISTS FOR A WARRY THE WAR THAT HE WAS THE WARRY TO THE WARRY AS A STATE OF THE WARRY AS	Actional Assessment constants																
-	Marine Straig Marine Sciences, School		expension to compared within a green year. It is posts the number of comings will provide the other assessments, compared in a percentage of the number of standards the compared of the point if the number of standard will depend on any expension copies of expension as setting any conducting the order.	- Chance of the Control of the Contr										Magazini M	# No. of No. of No.			magnatu. W	Me than set have any compared to	
	na Ppdina The neth intendig reprint (Mex)	-	eller rides, d'i transmisse popurate imperiad d'unarit, ily rime imperiate (né est annonque d'intra transmisse popurate imperiate annarit, ily rime imperiates.	AND DOOR OF THE PERSON NAMED IN			-				-				-					
-	to Ppdna for on in manufu toperat (forumps)	-		AND THE RESERVE AND ADDRESS.			_		<u> </u>					 					-	
-	triphyse thap have, flammed and transfer (MMT) flam (morth).	Name .		AFT THE RESIDENCE				100 100 100	1.00			1.00			-					
-	Triplages Rep. Away, National and Navadar (MRT), Nov. (a treat or	m) rijutus	has for an experience to be tracked as a second common as the	erginger han welled	<u> </u>		-							1			L			
			and the property of the content and the formal funds of the Action content and the content and	AND AND THE STREET OF STREET	1				7			T		$\Box \Box \Box \Box \Box$				+	+	\perp
-	Acts of Section reports or Sections (MI) decide (Anglespon) (Section) (MI)	1900	energy of Article for within this case that makes the appeting the case of a within the to layor the late of the Article code a restrict other than the Mit Melley insurface at the case of the case of the Article code is restricted that the Mit Melley insurface at Makes I than appear have to restricting the country for Article Affect and why it then the case it.			- - -		[-[-]-	$[\cdot]\cdot]$	- - -	[-[-]		- - -		- [-[-]-	1-1-1-	- - -	1-1-1	- [- [- [. [- [- [-
L			As a registrative regarding instrument to the VFA American for comparison persons, or determined and provide for American Instrument regarding represents order affiliate of the continuous values and					Ш	ш						Ш		ш			
			Note of the American perspectation of the contract of the Contract of the American of the Contract of the Cont	Author F.M. Action was arring organized in All (Mr.) organized from without																
~			If a selling has replacemental approach, solders levely service consistent medicated by the contempt of which the other procures that medicate in appearing the return of a servicy spit, to appear the level of the defeat using a medicate other than the think the selling resource about the selling it there explain have to medicated by the country of defeat and why it is have				-								-					
			is a suggestation approximate and the SM Advantible for compartition purposes, all control and any process of Advantible Security States approximate video and a of the Saffarra value made.																	
			The street of the second of th	- MUNICIPALITY SAN AND																
-	And if the Annual Statement (Statement and	-	Control of Control and the Section of the Section o												- - - -				-	
\vdash		+	This appropriates also before MRS of the national state that the form of the struct production is absolute from the forms that of the Analysis and programments of MRS for institute from which when the Analysis contact and programments.	Author of the Artisal reason printing continues in a MERTING CONTINUES THAT A STREET																
-	en e.a. ene lingracijone est	-	for nationally, incomparity to the most field y control decision cannot be seen if a settly to organize the spiciality, indicatedly control conduction institutioning for consisting control above with animal file and project an extracted for supering ma- terior. If a settly upon to experit to use of the Actual as explicit about the title the test.																-	
			After a strategy to these traver is the a completeness reporting experience to the M Actual Ages for complete other purposes, of cofficient Actual accomplete M Actual Ages has been for the M Approximate purposes and the Section AMM is of the Confirmal Advantage.																	
	er ta prest juiteri (mari mi	ngara.	And of the Principal program is an individual and the formula funded of the Principal times until gramphiques a still program to the surface subsets of the colors, or the store whether subsets that could have believe to the program the still.	Anthony of the Patentian security of the Control of																
-	and a second judgment in and		No. of the Probability Conference on the State of the Sta	Author of the Palacetan concentrating origination is still designating to the content	İ															
			And of M Places you have by a substant way the familier Audion of the Places soon windy continues to the MET, continues there without, while a familier to the loss which the parts that could have before a specially 10. Places of M or when we	Author of the Assessment of the Control of the Cont	İ															
-	the distributed (seeking) (seeking star)		As the first area of the real body and it is included to along the back. If a period in a proportional of a period in a period product and a period in a period i																	
			off any in files to come it. It is registrated importing assessment to the American Millian (community, all without the files process information absenting accounts because the files for the process of a community and a second transfer and a second files are processed.																	
			Note and Principle (in the late) is an included using the lateral or the Principle leads under continuous in the later (institute these suitable, where is the content, or the lead under the parties that could have be specified in the Content of the lateral using the lateral using the lateral lateral institute country the lateral.	CONTROL OF STREET, STR																
-	the distribution (constraint) (constraint)	-	consequent frames, the unity they are the method for againing this matter. For which, again to apport the last of the transmissioning a matted other than the Window, frame for the Matter, it must expend have to including the country of the most atten- politarily it filted to use it.																	
\vdash		+	As a registrate reporting section to the fraction of this position of field peaks of content and activity souths between the field of position of the field field may design features and the feet peaks true design of the delicities of account oppose the modes jub true for an opposition and within \$100 May feet for delicities of account oppose the modes jub true for an opposition and within \$100 May feet for \$100 May for account oppose the modes jub true for an opposition and within \$100 May feet for \$100 May for account oppose the modes jub true for an opposition and activity. \$100 May feet for \$100 May for account oppose the modes and the second opposition of the second opposition and second opposition and the second opposition a	NIL SEP NA																
-			a subsidiar a materiosas mass. Attytes du marin, comaran hava variant																	
	AND THE PERSON NAMED IN COLUMN		MET FAV. Map Audy Australia and Faul for pastly for an extra definition of desired and desired anotation and desired and desired and desired and desired and desir	THE REAL PROPERTY.																
	100 (00) (000)			National State of Sta																
-	Markette Angeles and Control Service Spinior Analysis	-	appoint Epigent to lake with within east design to more of burners																	
-	Maria Santa Ayens a si rkedita (fundas - maring	-	to body or province stopy trajecting in protection procession making along the trade. In Approved Epigenetic column cetting with the east storing the connect of business.	Land Committee		- - -				- - -					- - - -					
-	Managara (Magini Arcabara or managara (manana)	wno	Andread Agricultura Andread Angresians (Palling Approximate to the person of Alberta	Action of a relative or relative (or software) and the control that I forware, the forward per control to the control of equations and the control of the co																
	No. No. of State of S	1	Personal Agency for many a defect a fire contact of accommon of any stan- ments in the personal agent and detect to a defect of a contact of	Analysis and Assessment																
-		****	Section 2, and an experience of a description of the control of th		- - -	- - -	- - -	- - -	$ \cdot \cdot $	- - -	[-[-]		- - -		- [-[-]-	1-1-1-	- - -	1-1-1	- [- [- [1-1-1-
\vdash	Grantian or surface to appeal and surface	1	A product or the trace of Archery (see a second or Archery (see a secon			$\vdash\vdash\vdash$		++	H	++	+++	+	++	++++	+++	++	H	+++	+++	+++
~		rium.	defined, an extra portion of a decision contract which contract the best feet on country portion of a decision contract region of the post of the post decision country portion and general data to release unique. You dragger to supply of posterior country and the country contracts and across drips. The feet country and the country of the posterior country.		- - -	- - -	- - -	- - -	$ \cdot \cdot $	- - -	[-[-]		- - -		- [-[-]-	1-1-1-	- - -	1-1-1	- [- [- [1-1-1-
	Machingarian and Rose for Sures Struck Favorisies.	t	And the state of t	Amenings of emotions that recount requests trades to their requests therein.	T ' '		-												_	
		Na. mu	Common or period, Administrações Separado como ou provinción primario, del Statulo que de sectionida anticidad actual como "Administrações Sequentiva" de la Administrações de seguina de aprimeira de seguina de aprimeira de seguina de aprimeira de seguina de aprimeira de seguina de aprimeira de seguina de seguina de seguina de aprimeira de seguina de aprimeira de seguina de aprimeira de seguina de aprimeira de seguina de se	to the same of the																
	Annual Contract of the Contrac		Contract that the comply will the required topology superiors. Assume, some settler of authors above, whether with required topology superiors. As a few part release year superior settler are product by parts, about inspection, also in the part release year specially to provide a part and the parts of the second contract superior factors are producted by provided and a few treatment and release to the second contract of the second c	THE RESERVE OF THE PARTY OF THE															-	
-		1	Property" with Softe Enganesy of parties as quarterist and time. "NewSort" with to before assets and an insorteness, searching protection before, requester, time, paint, and parties and an insorteness are asset and an insorteness and an insorteness.	trong a monera managem					-								-			
			and the compy will the requirement beginning separations described the second section of the part of the second section of the section of the se	The state of the same.			-												-	
\vdash	Management and Resident States States Control States	+	reporting the best trapperty of parties as quantum control. "Structure" often to plants assets and a considerate, number presents design, against, may price, the parties designed that the control of	Annalige of makes that must report	-															
-			Appear and the second s				-													
\vdash	markettanhera ha a nighta final mesa has a ***		effect to during a cust cust out on transformers, such ting processes discuss, required to the parties of the p	Analogo sono a nor concesso.	<u> </u>															
L-			Segue Secretary conference or constant.		<u></u>	tion to	-		L		the territories				NAME AND ADDRESS		L		an North artists	
	the spinor revenue areas during startings		Application for ratio of use the property and it is not to an application of the second of the secon	According of with order, purchasing companies in the part consider year																
Ľ			Secretar para consensa crima and all tar para Marchael Armania (Armania Armania									- ^								
	Na spires revenue area design functions		Applications of the control of the c	According of with order, purchasing companies in the part consider year																
L	<u> </u>		section per product of the state of the per beautist about the perfect of the state of the section of the secti	<u></u>													шП			
	NATIONAL AND PARTIES OF THE PARTIES	e maren	Material Agency the harbor of the hypothesis and the second of the complete of the control of the complete of the control of t	According of contrast action companies					M. M	185 185 AM		nen een		100 100 100 1100 1100			MA			
\vdash		+	Contraction Separate Service on proceeding Account and	Annings of servine arters company					${\mathbb H}^{\perp}$	$\sqcup \bot \bot$							\vdash			$\perp \perp \perp$
-		Harm	por il fino conti, firmi canoner uni di fin hacità processo, fin propriati fatto challocorrae softwares forciparty for some est, alter associate di antico sea, fosperio sotto e e proceder la fortunazione accompanione upperio.								100						L		10.70	
-	AND COLUMN ASSESS FROM A MARK STOPP SECURIOR (MARKETS)	-	Michigan Spikelin. The humber of through hand in methodoxino that was a complete and in control of the second and through used it indifferences that were that a first described pair in their second or pair in their second or pair in their second or pair in their second or pair in their second or pair in their second or pair in the second or pair in t	Annaged service areas sequen		180 180 180														m an an an
\vdash		1		Annalis de comitiva activas completado			-		\vdash \vdash					+			\vdash			1 1 1
-	Na Response Nation - National Inc.	Harm	repeat here manned unforces to partie of the argument to provide the second to provide the second to partie of the second to p	Settend assesse													.			
-		-	And the the continue specified a service; and ASSI, had approximate to beyond, to the Man Wall, topology increasing product to developing and the continue specified the control continue state paragraphic performance and the continue of the production.													1-1-1-		1-1-1		<u>. .</u> . .
-	Na Response balls - Navarrani (anna)	-	Parameter Agents of the expension conference and the set that the rate to continue upon had a sette out, and adjuly, that appropriate on the frequency or the after their segments received any parameter or extended on a final received approxi- ty to their their segments and the second of their continues of their received approxi-	Antonia sussia																
-	Na Response halls - Harthelm (Harth)		And the first section appears to the section of the	Notice of an accorda													L.L.	1.1.1		
-	to herperior tests - testbolic (enal)	F		Author d'accessor												1.1.1.	1.1.1.			1.1.1.
_		-	A series resource from the construction for the conflict of the cities and a series of the conflict of the cities and a series of the conflict of the cities and a series of the conflict of the cities and a series of the conflict of the cities and a series of the conflict of the cities and a series of the conflict of the cities and a series of the conflict of the cities and a series of the cities	Notice of Montal Service													L			
-		-	Name and the same area of the same and the s					[-[-]-	$[\cdot]\cdot]$	- - -	[-[-]		- - -				- - -	1-1-1		. [- [- [-
-	As a real magnetic disconfiguracy)	-	The number of purposes in the company of the compan	Antonia Manada Angaritan							-				-					
t	Machine and the American		Author transmitter following in the set of all amount another considerable following and principles of the set of the following continues decisions and make the settlement of the following continues decisions and make a fine consistency or con-	Authorid accession procession		No. No.													an Northwester	
1 -		ria-re-	upor a faccione physically femant of an endorse a decaugad from to intercalled despi- tes that the transfer and entors of a statuted points only in organizing intercases or research with four physical points of principles appealable (if a continued from the four-to-measure and that the contrast the granules is beingto-aligned.			tion to	-				No Section 6				No. The Residen				an terrorist	
	Andrew Street,	ner-	Authorit statutur Multipation is the suit of oil anterior contention of the statute of the statu	Authorid acustoma parameteristic		No. No.	Mariation				the technique				NO. THE RANGES				en familiariste	
		The Table	the time that the effect represents the representation of the relative to the second section of the section of the secti	1	1				1		-			1			1			
-		<u> </u>	contract from the process a being algorithm.																	

Attache	iafety Performance Metrics - 2022 ent B Summary								
					-				
Maria	Materials	negry	Mark Management of the Control of th	Man.	10				
	Section & Section (Set Factor Real for Joseph)	THE THE	heapt digit a content to condent responsible content and the con- tra terrally to execute at the date of content area and "April to co- tant content to the content of the content of the con-						
	Note that a first the control of the	-	termini, at announces and an announce of the financial processing and the processing of the processing and t	product or control strategies are no	- - - - - - - - -	 - - . -		- - - - - - - - - -
		1	language and a state of the sta	Partie or make the artists of the parties of the pa					
	rectric transgero, Maspatas (cueruge manths)	- Name	solutions has he has a delivative in the time a specialistic or a possible per qualitative expenser, amend south throughout, confliction include, all settle areas arguments the rank and have made south, to be attrict, subsplicitions, the date areas desired the assign time and having time shall be provided a structure or defined a delivery.	- Company one					
		1	the property of the terms of the property of t	As the include for a serious prior of a partier for copied when to					
-	martin transport, Response (marting winser)	rise rev	Segment of the first such and with the Broady to the affiliary wide, forther, the Admi- tion is described for a single-time and makes the soled for provided in construction or defined in the first first of the applications of the solet in the analysis of the	a secondario come.			mar.		
		T	hang the production of these is equal to the analysis shall supply selected for the test of selection to the sea apparatus of service for season great constitutions selected and selections.	Partie in the American American					
-	Partiti Margani, Najaras (hatan nathi)	- Control	organizary from the sale and sale made though to the unitrary under feature. The data said to deferring the average time and makes time shall be provided to recomment as defeature and the other prices applications information, and as a matter.	at intergroup within					
			being the adminishment in make it inspects only a demicroscopic diagons y settlement has the rise of anti-area for the tree or opposition of a partial first repealed arrest noise, thought y settlement include of settlement	Parties of the control of the contro					
-	more morgon, Repres (noter smar)	-	organistic from the color and not the second to the alletter which feature. The date and it desired the annual time and feature the shall be provided in recomment or defeature the time? While I is an application of demands, and as a feature.	a consequent conse					
	on dear langed	riscrer.	The market of the modelle arrowing reprinted to the marketing finder unlittle. Section 1994 to at Section 18, 1855 A. The market of 1875 by the figure per 1, 1885 and organized before descripting important and the control of 1875 by the figure per 1, 1885 and organized before descripting important and the control of 1875 by the figure per 1, 1885 and organized before descripting important and the control of 1875 by the control of	Martine of Established Association					
	na ng n (name)	-	equations of entergrand gas form; as a mode of a consistent for their files and come tribute in the party leg of a foreign country conserve other fluctibe with, or a other contents.						
		1	the number of the purity gas digital per CHR consequence forces distribute independent for gas the same than permitted to be the place of the content of the large between	Actual despriyent of colorina					
	to tip o (ottor)	-	of acceptance from party Right in Annual resourcing common other than the orthic or other commons.	*					
	to the top the proof provings	-	The risk of the course of the	Marine Park Papers price	105		105	45	15
	that is the best Market Free - Market (Healthig)	**	tions for a succession of a selection of the selection of the selection of a selection of the selection of t	performance separation on the few of	2010 MAR MAR MAR MAR MAR MAR MAR MAR		- NAME AND ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF	THE RES ST. ST. ST. ST. ST. ST. ST. ST. ST. ST	
-	that is the best black from Mana (arrival)		Sente that is clearly a when a constitution organization than a sent in a fact. The data and it determine the realist that shall be provided a constitution	And a mode report to my to fee of you're to the best state.					
	ear of the text Market Prints - Market (Houston)		Annual Teath and the Control of the	per for manufacture streets					
-	the to the last blade from Section person.	-	Marie College (Marie College C	Section of the later through the section of the sec					
-	The Real Phones (Health)	-	many are an extensive to the extensive expensive expensi	To the comment of the beauty					
	na Khagonij Rojana. Aungo (namin)	-	believed for the first of definition in the bits a parameter specified for quarter first superior arrand more. Recognity settle also conducted settlements reprinting for this sets and set make though to the arrandom subsystems. We also seed to destining the average this and related the other be provided in contrasts.	per production and a service					
\vdash		-		To the comment of the beauty					
-	na Magani Najana Aanga (mar)	-	defined processing many over some sound on a resonance of sections in	See a marginal see.	***			ma.	
-		-		Parties of the section of the section of					
-	na Empero Nepara-Makar (methy	-	parties for expense; areas some marginey software review of refriences expense; for the software some marginey software review of refriences expense; for the software red red residently to the others with follow. To de-	Manufacture of a quarter for expensive season of an amaginery season.					
				Name a resident from the control					
-	na trugoni kojima Matarijonarij	-	self-bases from the time of confinence in the time a parameter operation for quarter from top and of arrival confinence to parameters remained at confinence or principles of the confinence to the time of the confinence of the	Approximate or a quarter for expense time to expense the excess of a service sector is an amagine; when	476			mm.	
1		₩					1		1
-	tenorina temp taura susunoti teristus	1	Apparatus de comparad activo a pare pare il significial maribo di comparadi para les altre assessante, comparad e la processaga di file suntire infrabilità hallo compara il file pared. Par suntire infrabilità and depond di uny seglettory copinal reportation al activa sey combardità, file actività.	and the same of th	the approximation of the analysis of the property of the second of the s		No approve a while has an has any companion.	the appeals. While the extreme a prompt with	the approach. While they will have any stronger access.
-	to Ppine Turnets remain report (Mar)	-	Marindo d'Assistante por la respectad de sur la figura espectació de sud actualiga d'Assistante populario topa de di estada figurale espectació.	*********	hat.		No.	No.	
-	ta Pjelna Sir och manelj mjerat (hormge)	-	ritor ritor d'insurance populari reported d'inselly by vince imperior (né) and annoning a l'insurance populari imperiod a monty by vince imperioris.	anapronues:	-		-	-	
-	regispes they have, framework throde (MRT) force (motio)	1910	that has a consequent as what a remaining to the transity of they have been suffered with a second contract of the second contract with a	September 1991 Medical Accessing					
-	regispection design framework transfer materials are in	-	MATERIA CONTRACTOR AND ACTION OF THE CONTRACTOR	MIT THE THE MITTER AND THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF T					
F		÷	New of Mr Advant jurgingsof a non-denter using the female fluides of Mr Advant non- enting origings a EASAM (origings from section which which Mr Advant	Series F18 Area reconstruing originals	 		 	 	+
	[the numerical management is the stress owners with the properties make with the process print is taken and management acting which is a strey to represent a species, and it and interest carried which is a strey too representative species, and it is all the contract of the contract o			+1			
-	and the second street of the second s		consisting NF Artical, the untilly that you that the final fire appointing this tractic. As a stilly, upon to oppose the same of the Artical country is trached with the NF Artical State of Artical Country (Inc. 2014), it is not explain from the country fire country NF Artical Artical Artical and a fig. 1 into the country of Artical Artical Artical and a fig. 1 into the country of Artical	-	[-[-[-[-]-[-]-[-[-[-]-	1-1-	1-1-1-1-1-1-1-1-1-1-1-1-	- - - - - - - - - -	1-1-1-1-1-1-1-1-1-1-1-1-1
L	L	L	A conjunctive reporting securities to the Americkan for comparative purpose, and the color process for Americkan Securities reporting separations under MRS of the Securities with credit.	1	<u> </u>		<u>, , , , , , ,</u> , , , , , , , ,	<u> </u>	<u>, , , , , , ,</u> , , , , , , , , ,
			New of the American property is considered using the former funder of the American strong completes a design of employee force activate when the American content using the authorities property that these contents contents is the properties of the activation contents after 1 and 1 and 1	Section 7 19 Action made arriving originals and part of the Action made arrived	1	-	1		
-			for a string has implemented a spiritualise, understanding standing detailed. If a string has implemented a spiritualise, understanding standing standing the matter manifestanding for assessing the Artista, the string range was made manifestal the spiritual film standing than the string the standing for the standing that the string range to a spiritual standing for the standing range to a standing that the standing range to a standing range to a spiritual standing that the standing range to a standin		***				
			base, i mun capus how is nothering for curring of Anna Affec and why i the Brace it is a copie to the capusing success to the 1st Anna Has for conjugation property.						
\vdash		+	MRS of the Substitute wider code. Note of Manual Production in considerating the Substitute Substitute of Manual Code and Code a	A STATE OF A STATE OF		T T	 		
			for nationally, received by the William belong a contraction or national basis of with the experimental a spinores, autonomy contraction received in retaining for contract contracts where a PF contract the with you, and the restrict for equivage to						
-	year 4 de verte language language and	-	AND TO MELICIPATE EXPENDED HIS AND AND AND AND AND AND AND AND THE TO THE PARTY OF AND AND AND AND AND AND AND AND AND AND						. - - - - - - - - -
\vdash		-	the spring operates and beautiful at the rations about the for any about the form of a service of the factor factor of the same of the con-	-					
			the national process of the Process of the second process of the accordance of the second process of the secon						
-	No. of W. Arter (Statement (Statement And)	-	ANTE EXAMPLES EXPLICIT THE THE SECURITY AND A THE SECURITY STATE OF THE SECURITY SECURITY SECURITY SECURITY SECURITY SECURITY SECURITY SECURITY SECURITY SECURITY SECURITY SECURITY SECURITY SECURITY SECURITY SECURITY SECU	_				***	-
\vdash		-	Note to comparative proposes, an admission that also sport for defeate the last terral distribution of the comparative proposes and the forms MMR of the contract value code. See all M Admits (implesses) is an admits and the forms to broke the code of the co	Action of the Contract of the					
	And of the State of Prophysical State of the State of	-	tions arrang criplicates a PREPERFORMATION without waters a NF content, or this later would be courte that count had believe in operation to	erginyan a erepektijangkapa haan wakan					
-	and if the desirated property is travel asset	-	Not of M Placetar (Improjus) is released using the former funder of the released tools artistic conjugate a PRE/PRE/Impley from section where a M model, it the loss would be exact. For could have full to a high other th.	Andrew of the Administration of the Administ					
		T	No. of M. Marriar you have by a solutional using the factories during all financial toos along common of MICRO Contracts from solution, when a M. makes, or the loss and the contract of countries below a sounder of a financial M. contracts or property and the countries for the first a sounder of a financial M. contracts or property or the financial for the first a sounder of a financial M. contracts or property or the financial for the first and the first and the financial format of the first and	Section of the Assessment of Street, Contraction of Street, Contract Contract Contract					
	no d' W Routed (national (north), sec	-	described using the tell haloly and the software accuracy describe. If a string the replacemental application, colors study arrive consumers restrictingly for accounty del fraction, the satisfy they are that contract for opening this colors. If a string						
			ign to open the see of the relations using a method other than the Windows From France Medic, I must explain how to restricting for making MF thermal affici- ciently of their Science S. A consideration open security of the recognition of their construction of contracts.						
\vdash		-	And process reference observed to the securities the test of processed to the securities of the security of th	Action of the Assessment arrang					
			tions using contacts that (all the contacts that contact and other and contact in the contact has contact the contact has better a specialist at financial for contacts and described using the titl solving and tribunitaries according times. If a print has represented a specialist, colors that, contact contacts contacts in the backing for						
-	And if W Restler (bulleter) (street and	Name of Street	county Millerton, the obligatory was that control for opening the county. For other special opening was of the fractions using a control other than the Millerton, these forces Marks, it must expect how to confirming for country Millerton of the					***	-
			is a conjunctive opering national to the fraction of this posture of a state of the contract of a state of the contract of the						
١.	AND THE RESIDENCE AND THE PARTY OF THE PARTY		Marin Bay Away Service of Nation (All Park Transport and Anthonous Artificial Service of Parks of National Artificial Service of National Artificial Service of National Artificial Service of National Artificial Service of National Artificial Service of National Artificial Service of National Artificial Service of National Service of National Artificial Service of National Service of	-					
_									
	contractor thap design functions		BOT TAY THE MEN SERVICE THE TOTAL PARTY TO SERVICE THE	-	***		856		
	Texas (AMI) Sales and								
-	Markette and the control of the cont	-	to design at passive stops to general passive read during the contex of betters. Approximately process to the context of the context of betters.		- - - - - - - - -				
_	Marketon rano comedita horizo, nertic	epone.	delines a better units referal or learner bearest united seal proper or	Action of Assessed					
\vdash		+	econtract management land observe as in source	Action of a reason or reason for before					
	entitle (afternoon number) install	ana		prosperings have (some of equations arrange or dealers, somewhere)					
			combined by permanentary permit defeat and it auditority or, but namely whereast is designated by consequences above sort or has, constitutions, or whereast, on an experiment of a designation design the control of the ground. This name	-					
-		-	Sec an arrival provide anapartor de la calcular catago from resport o sejang o servide comos. Meste careado comissão y contentos aná acreaio despo fron textorio sejante de o provintigo d'est antico desposações para porto desporta portos de provided for trava recurso que destinado carea.			1.1.1.1.1.1.1.1.1.1.1.1.1.1.		
	No. No. of States of States of States	T	MANAGEMENT TO THE EXPLANATION OF THE PARTY O	transport and the constant					
-		-	enteres, en en el periori de abando conhete fini such e fini periori fini such e las las conde provinci anglicino de la conhete ellipsi fini suguent capital e periori e en el conde provinci anglicino de la conhete ellipsi fini suguent capital e periori e en el conde periori anglicino ellipsi ellips	-	- - - - - - - - - -	1-1-	1-1-1-1-1-1-1-1-1-1-1-1-		
\vdash		+	Annual of princings of at which their cents, in the periods the per- dended before an exception of standard order of non-fact cents or number of non- ted sempty will the important happenry supercomm. Antening that number of non-fac-	Annage of manage for management		1 1	 	 	
			Annual relations will enqueries that in the part and of part begans from a second and a second relation of parts of the parts of the parts of the parts of the parts of the parts of the parts of the parts of the parts of the parts of the parts of the parts of parts	1	sen.		100	nen	man.
		t	Continues author asserts desse consider allowance de desse republic desse de consider allowers de consideration de desse de la consideration de la consideration de la consideration de color de activaciones consideration de la consideration de la consideration de color de activaciones de la consideration del la consideration del consideration de la consideration del consideration de la consideration de la consideration de la consideration de la consideration de la consideration de la consideration de la consideration de la consideration de la consideration de la consideration de la consideration de la consideration de la consideration de la consideration de la consideration de la consideration de la consideration de la consideration	Anadage of makes that make reports the factor to product the last.					
		-	Regions from an provide for partie, Advant in parties in Spirals from an consider for princip administrative and more conflict from "Minimizing and Stage of "Color to the Engage of parties on quarteristic and the "Structure" of on a destrict which calls a characteristic, parties and principle design, country.	:			_	nen.	_
		t	The particular service of the servic	Anadage of makes that make reports the factor to product the last.					
		-	Separate materia and procedule for particle, Administration to Separate material and procedule for princip distribution and track mount conflicted around, "Missional particle frequency" of the Separate procedule and appropriate particle and the "Missional particle particle and an article and conflicted and particle and an article and article article and article article and article and article and article and article and article and article and article article and article and article article and article article article and article	:	sen.		100	nen	nen.
\vdash	Manageria of Rein States Inch. Principles	+	the control of the co	Annalige of Products for House Imparts of Market Indian Imparts Inches			1	1	+
-			control of the first feature of the control of the post of the pos	-	100		100	non.	_
\perp		1	the same and art a society, wring press have, species,				1		1
-	- majoria masa masa jana sasat,	-	THE PARTY CONTRACTOR OF STREET		No billionida		tion hardens	Note Sectional above	NAME AND ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY AND ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY ADDRESS OF THE PARTY A
-	the figures constitute action facility. Horizonta	t	NAME AND THE COURSE OF MAIN PROPERTY AND A SERVICE AND A S	Accordings of work orders part that for completions in the part secondary part		T			
-		-	description of the personney year description shall be the sentence of the service again the complete as the sent of the service against again when a pair which year, excluded with and of the year description around a place of after against a separate of the service and the service and a service against a description of the service and the service and the service and a serv	-					
-	to Sprand returns since Soling - Tarumuso	+	Report form an producting a destinate origin territorio. Management from other front order processor cover destit for the en-	Stronge of anti-order particular					
-		-	Some to complete the west state in the part words your december of the sound of the state of the part and complete in a feature of the sound with a time of the sound or complete the complete is a feature of the sound with a time of the sound of the sound of the						
<u></u>		1	of other approved regional in Art Mart Ret, or the artificial conduction representation are provided for parallel desired and parallel control or desired and desired the control of their control or	and the second					
-	and the same of th	-	the design of a somewhat of their year I software the area of the in- position of the somewhat of their year I software the area of the in- stance of the some suits of the somewhat will be the the some processes, the request not consideration software the party to some one other sounds				\$100 USES \$100 \$100 \$100 \$100 \$100 \$100 \$100 \$10	AND 1975 MIND 1975 AND 1975 AND 1975 MIND 1975 AND 1975 A	
-		+	Contraction begans from an production between account on the companies. The best of the contract of the contr	Marriage of construct actions companie					
-			The second secon	1	anam.		10.00	98.795	w.w.
		t	Management of the control of the con	Minimage of construction actions completed	1880 SIN SIN SIN SIN SIN SIN SIN SIN SIN SIN		10.000 1000 1000 1000 1000 1000 1000 10		+
-		-	per la fina creata, men consensar set nel hace de presson, for proposit describations de territories después la consensa este neuronis en accessos. Injunes notos en productivo destinant activamentos supresen-	1	1880 AND AND AND AND AND AND AND			2.00 Martin 2.000 Miles 2.000	n 2007 100 1107 200 1107 1100 1100 1100 1
-	ACCUPATION NAMES (PART AND ASSESSMENT OF STREET	1000	Mode Service place the confer of the opposite of self-cone the case inspection of the desiration for their self-conference of the cone their account of a excess year of their cone is, first, cone can a self-cone of their depositions, the cone of their cone cone of their cone of		-		_		
Ē	NA RESPONSE NAME - NAVAROUS (NAME)	H.	Transcens Space Series or parallel activities artisticismosphiis.	and or a second				+,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
-		-	Not the the continue upon had a service test apply, had approximate the purpose to the about 1996, because the course provided to destinate and true traces appear the tests consecuted by a specimen performance and the children of personal			- [- [-			1-1-1-1-1-1-1-1-1-1-1-1-1
-	to terperantials. Notice (small	_	Productions Against HAV reproduct married variety as that for our to common quarted a service, see apply, but approximate topology to the SNA Against memory product to define our of the treat course	Name of Assessment				1	
-	to project on the second	1		National Assessment					
-	<u> </u>	Ŀ	the state was against some on possible to employ of periodic or some supply of the special source of the state of the special source of the state of the special source of the state of the special source of the state of the special source of the state of the special source of the state of the special source of the state of the special source of the state of the special source of the state of the special source of the state of the special source of the state of the special source o						
-	to respond to the second	_	Maria Salaman (Maria Sapanda serpetua serpetua serbita de Antal Maria Nacionalista speciale e sercicir, ser didiri, sur approximita la Sapano, sulla città SMA Sapano corres se procede la decembra sull'accommission quanti	Action of an artists		-	-		
-	na it one requires wear proving	\vdash	The second state of the second polynomial and the stages, of projection the second of the population is the supplemental of the second field approximate and a second of the second state of the second field approximate and a second of the second state of the second field approximate and a second of the second state of the second field approximate and a second of the second state of the second field approximate and a second of the second state of the second field approximate and a second of the second state of the second field approximate and a second of the second state of	Series of Montal Aspertus					+++++++++++++++++++++++++++++++++++++++
-	L	L				11:11:			<u> - - - - - - </u> - - - -
-	to a contract the state of the	_	No. Control Pipe Species in the respectation for record the depotent account of the control of t	Action of Minard Reports are		-	-		
\vdash	AND DESCRIPTION OF THE PARTY OF	+	Authoritischer Schrijfstelle is die unterfried unterstellen unterfried unter der der der der der der der der der d	Action of a service processes					
-			National Company where the company of the company o	1	No watering		Note that Audition	Non-Non-Audielle	-
\vdash	National Addison Street	+		Antonia anno					
-		-	before the contract of the con	1	Non-Non-Audient		NAC NO ANNOTAL	No. Science	
ш	l	1_	and the first of the process of the property of a common feet from the common and the first from the common and the first from the first from the common and the first from the common and the first from the common and the first from the common and	1			1	_1	

The below is presented an supplemental information as under in the motive description for Motive \$2.5 tables. Energy models are been the tree of motification in the time a representation for against first reported private annual conflictants from the tree of motification in the time a representation for against first reported private annual companyers applications the all motifications (register from \$2.5.5) and not all most density is the under a companyer applications (and a softenization application from \$2.5.5) and not all most density is the under a conflictant and a softenization of the arrange time and market the shall be provided in increments as defined 50.32.232 [clin south of the conflictant of the arrange time and market the shall be provided in increments as defined 50.32.232 [clin south of the conflictant of the arrange time and market the shall be provided in increments as defined 50.32.232 [clin south of the conflictant of the arrange time and the action of the arrange time.]

										Count of											Count of														Count of						
Year /	Count of	≥ 05 Min	≥ 10 Min	≥ 15 Min	≥ 20 Min	≥25 Min	≥ 30 Min	≥ 35 Min	≥ 40 Min	≥ 45 Min	≥ 50 Min	≥ 55 Min	Count of	Year /	Count of	≥ 05 Min	≥ 10 Min	≥15 Min	≥ 20 Min	≥ 25 Min	≥ 30 Min	≥ 35 Min	≥ 40 Min	≥ 45 Min	≥ 50 Min	≥ 55 Min	Count of	Year /	Count of	≥ 05 Min	≥10 Min	≥ 15 Min	≥ 20 Min	≥ 25 Min	≥ 30 Min	≥35 Min	≥40 Min	≥45 Min	≥ 50 Min	≥ SS Min	Count of
Month			< 15 Min																																						
2013	25	35	90	137	147	174	128	104	102	97	76	55	589	2014	21	- 44	94	163	154	131	148	120	76	33	63	57	733	2015	28	39	64	139	147	153	136	116	96	72	72	47	691
1	2	- 5	7	15	12	18	11	25	20	12	- 6	5	50	1	0	0	8	13	10		14	9	2	7	- 4	7	45	1	1	- 4	10	9	9	17	14	8	9	6	4	2	35
2	3	2	- 4	9	8	19	- 5	5	8	7	3	- 4	35	2	2	5	- 6	9	14	10	16	8	8	5	- 4	7	79	2	0	2	3	8	12	- 6	5	7	4	8	4	- 6	48
3	1	2	11	18	14	14	9	25	9	7	2	5	41	3	1	- 4	5	15	10	14	11	14	7	- 4	2	3	57	3	- 5	1	- 4	9	15	13	11	9	7	- 4	5	2	48
4	3	1	9	6	7	6	16	10	7	8	5	2	55	4	3	- 6	10	17	18	11	13	9	- 4	8	9	3	70	4	3	3	5	13	15	14	10	9	6	7	5	9	59
5	3	- 6	- 6	9	17	12	9	12	15	9	8	- 4	43	5	3	9	7	17	11	16	22	11	9	9	- 4	7	61	5	- 4	3	- 4	11	11	13	10	11	7	5	3	3	53
6	0	- 4	9	15	15	14	8	25	- 5	7	- 8	3	55	6	1	7	- 6	20	13	7	14	8	7	10	0	3	48	6	- 4	3	7	- 6	3	11	20	3	10	- 6	6	- 6	54
7	- 4	3	8	16	11	23	12	10	5	11	10	8	74	7	3	3	10	14	19	7	8	9	5	9	10	- 6	54	7	2	- 6	5	5	14	- 6	12	12	5	10	7	1	75
	5	1	10	9	23	16	10	9	20	- 5	8	7	57		0	3	9	7	8	10	12	11	10	- 6	8	2	57	8	2	- 5	2	20	15	15	13	11	12	6	9	4	71
9	1	3	3	9	11	9	9	8	10	15	- 4	- 4	43	9	1	2	7	14	13	15	10	8	6	10	- 4	3	39	9	1	4	6	24	14	18	11	11	9	- 4	5	4	72
10	1	- 4	9	6	7	12	11	9	5	5	7	5	52	10	- 4	1	10	12	10	14	5	12	7	9	- 4	5	45	10	0	1	3	10	9	12	11	- 6	12	7	7	4	54
11	0	3	7	16	9	15	14	12	9	- 5	- 6	- 4	42	11	0	2	10	9	15	9	16	13	3	7	7	3	66	11	3	3	9	12	11	13	2	14	8	- 4	11	4	62
12	2	,	7	9	23	16	14	- 5	9	- 6	9	- 4	42	12	3	2	- 6	16	13	10	7	8	88	9	7	8	62	12	3	- 4	6	12	14	15	11	15	7	5	- 6	2	60

The below is presented an angiomental solvenation is stated in this sector, description for Mario SE. Exciso, Company from the longest Term it recognition and contract to respond on the longest term it recognition of the emergency entidication from the time of coefficients to the time a representation for quadrate from trapported partners and terminative contractions of coefficients of the contraction of the coefficients o

												Count of													Count of											Count of				Count of	Count of	1 1
Ye	r/ Co	ount of	≥ 05 Min	≥ 10 Min	≥ 15 Min	≥ 20 Min	≥25 Min	≥ 30 Min	≥ 35 Min	≥ 40 Mir	≥ 45 Min	≥ 50 Min	≥55 Min	Count of	Year /	Count of	≥ 05 Min	≥ 10 Min	≥15 Min	≥20 Min	≥ 25 Min	≥ 30 Min	≥ 35 Min	≥ 40 Min	≥ 45 Min	≥ 50 Min	≥ 55 Min	Count of	Year /	Count of	≥ 05 Min	≥ 10 Min	≥ 15 Min	≥ 20 Min	≥ 25 Min	≥ 30 Min	≥35 Min	≥40 Min	≥45 Min	≥ 50 Min	≥ SS Min	Count of
Mo	nth <0	os Min	< 10 Min	< 15 Min	< 20 Min	< 25 Min	< 30 Min	< 35 Min	< 40 Min	< 45 Mir	< 50 Min	< 55 Min	< 60 Min	≥ 60 Min	Month	< 05 Min	< 10 Min	< 15 Min	< 20 Min	< 25 Min	< 30 Min	< 35 Min	< 40 Min	< 45 Min	< 50 Min	< 55 Min	< 60 Min	≥ 60 Min	Month	< 05 Min	< 10 Min	< 15 Min	< 20 Min	< 25 Min	< 30 Min	< 35 Min	< 40 Min	< 45 Min	< 50 Min	< 55 Min	< 60 Min	≥ 60 Min
20	16	19	38	103	161	161	185	158	117	105	105	89	78	361	2017	22	33	85	141	176	191	176	135	125	115	87	65	878	2018	17	33	29	142	173	217	172	159	141	114	91	80	870
		1	3	7	10	17	12	19	10	15	13	10	7	149	1	- 6	1	- 4	13	13	17	21	16	17	18	11	8	143	1	0	2	10	7	12	23	16	7	14		- 4	7	36
		2	5	10	12	11	15	7	8	9	8	7	7	94	2	3	- 4	- 6	17	17	15	17	16	- 6	9	11	5	70	2	2	1	12	9	- 6	21	15	8	15	11	5	5	73
		3	5	- 6	18	16	21	8	7	7	- 5	8	9	69	3	2	5	- 6	12	16	18	8	13	- 6	10	11	8	48	3	- 6	9	9	10	15	17	15	13	14	- 6	12	- 4	79
		2	1	13	14	11	18	12	10	5	10	3	7	45	4	1	6	6	16	15	20	10	9	10	3	1	6	59	4	2	3	5	9	18	16	18	11		12	6	- 4	56
		2	4	9	6	6	18	11	12	- 6	12	5	5	43	5	0	5	8	10	19	19	19	11	17	5	9	- 4	66	5	0	1	7	13	14	23	15	17		12	7	- 4	56
	5	2	1	10	16	16	16	15	14	7	- 5	9	- 5	65	6	0	3	9	19	10	16	13	10	7	12	8	5	80	6	0	1	- 6	17	17	20	19	14	11	12	8	13	81
	,	1	3	5	17	9	14	8	8	9	8	8	2	59	7	1	2	3	3	12	11	18	7	12	8	5	3	60	7	2	2	7	18	14	14	14	8	11	11	8	7	78
		0	4	8	18	23	17	21	16	11	8	12	- 5	64		3	3	8	14	16	23	16	11	10	14	7	- 4	70	8	0	2	5	14	12	13	7	23	10	9	8	11	82
	,	1	1	9	14	14	13	19	7	8	12	5	6	75	9	1	0	8	9	10	13	13	12	7	8	- 4	5	74	9	0	2	8	11	11	10	10	11	0	13	7	2	61
- 2	0	2	6	10	11	21	11	7	10	12	8	- 6	7	65	10	1	0	9	5	16	15	15	5	9	8	7	7	59	10	2	4	8	8	20	19	14	10	15	4	11	12	66
- 2	1	2	2	8	10	11	13	16	10	8	9	- 6	- 6	66	11	0	2	10	13	15	13	11	11	8	7	- 6	7	62	11	0	- 4	10	13	18	23	16	24	15	5	10	- 6	73
- 2	2	1	3	8	15	16	17	15	- 5	8	8	10	11	67	12	4	2	- 8	10	17	11	15	14	16	23	7	- 3	87	12	3	2	12	13	16	18	13	13	11	11	- 5	- 5	79

This below is presented as supplemental distinution in solid or the mostic disregative for Morie S. Excisio Emerging Employers Time: "Aware just and resident in their interest in respond existing to extract celled an important production of the time of motification in the time a representation (in qualified first responde) privated mosts, response productions which all an infections originating from 1511 calls and call model density to the utilizer's united trainings. The distinct of the strength of the average time and mediant time shall be provided in increments as defined 0.011 v.1212 (in presentation of the contraction of t

			Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of				Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of				Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of	
Ye	r / Cor	ant of	2 05 Min	≥ 10 Min	≥ 15 Min	≥ 20 Min	≥25 Min	≥ 30 Min	≥ 35 Min	≥ 40 Min	≥ 45 Min	≥ 50 Min	≥55 Min	Count of	Year /	Count of	≥ 05 Min	≥ 10 Min	≥ 15 Min	≥ 20 Min	≥ 25 Min	≥ 30 Min	≥ 35 Min	≥ 40 Min	≥ 45 Min	≥ 50 Min	≥ 55 Min	Count of	Year /	Count of	≥ 05 Min	≥ 10 Min	≥ 15 Min	≥ 20 Min	≥ 25 Min	≥ 30 Min	≥35 Min	≥40 Min	≥45 Min	≥ 50 Min	≥ SS Min	Count of
Mo	sth <0	S Min	< 10 Min	< 15 Min	< 20 Min	< 25 Min	< 30 Min	< 35 Min	< 40 Min	< 45 Min	< 50 Min	< 55 Min	< 60 Min	≥ 60 Min	Month	< 05 Min	< 10 Min	< 15 Min	< 20 Min	< 25 Min	< 30 Min	< 35 Min	< 40 Min	< 45 Min	< 50 Min	< 55 Min	< 60 Min	≥ 60 Min	Month	< 05 Min	< 10 Min	< 15 Min	< 20 Min	< 25 Min	< 30 Min	< 35 Min	< 40 Min	< 45 Min	< 50 Min	< 55 Min	< 60 Min	≥ 60 Min
20	19	17	45	112	170	197	221	175	157	127	103	92	85	824	2020	11	61	130	242	281	262	229	185	136	124	109	100	525	2021	69	44	173	220	263	285	216	173	177	144	110	105	642
		1	4	- 4	3	17	21	16	23	8	- 6	- 6	- 5	76	1	0	2	- 5	9	11	21	7	13	14	10	7	- 5	31	1	- 5	10	22	34	30	35	24	20	24	19	15	6	77
		1	2	10	17	24	15	16	17	21	11	9	12	84	2	1	- 4	5	15	13	17	25	21	12	14	- 4	- 5	47	2	3	4	11	18	26	22	26	17	21	12	7	7	49
		2	2	10	15	12	19	12	17	8	8	11	7	50	3	2	- 4	7	12	25	16	12	8	8	12	10	11	42	3	1	- 6	10	24	27	14	22	20	10	17	9	7	54
		1	3	9	12	12	22	10	12	6	5	3	6	63	4	0	8	9	20	24	21	12	15	8	5	8	8	34	4	17	1	10	17	28	19	19	10	10	0	- 6	5	37
		0	5	9	18	17	16	11	11	11	8	1	7	64	5	1	- 6	13	20	27	32	20	12	11	16	12	- 4	41	5	5	4	7	22	28	20	15	7	14	17	18	5	50
		4	0	8	9	14	21	10	15	9	- 6	9	9	64	6	0	8	18	26	43	25	19	22	10	12	11	12	55	- 6	8	- 6	19	36	31	31	14	16	13	0	16	17	50
		3	5	6	11	12	24	10	11	18	9	9	7	74	7	1	- 6	18	17	22	23	19	21	14	8	11	7	53	7	- 4	4	8	14	20	22	27	25	0	18	10	9	52
		1	5	7	20	23	10	23	8	11	7	7	8	74		2	7	12	21	27	19	21	9	8	10	7	12	46		7	0	34	0	0	45	0	0	32	0	0	22	64
		1	9	10	17	19	2	19	16	7	10	9	4	67	9	1	3	8	26	31	23	17	17	13	12	9	9	49	9	4	2	11	17	16	15	12	15	11	12	8	8	56
- 2)	2	7	11	12	13	22	19	16	8	16	10	8	65	10	1	3	15	22	19	20	25	18	10	11	11	13	40	10	5	1	12	12	23	20	20	22	11	13	8	8	64
- 2		0	3	15	8	23	27	10	13	10	10	9	5	95	11	0	2	10	35	22	23	28	12	15	10	11	8	33	11	5	2	8	12	19	16	23	10	- 4	11	- 6	2	33
- 2	2	1	3	13	22	21	15	19	8	10	7	9	8	47	12	2	8	10	19	17	22	24	18	13	- 4	8	6	54	12	- 5	- 4	21	14	15	23	14	11	18	7	7	12	56

The below is presented an applicamental information as restal in the motion decouption for Motics 47. Thirds 2 Deepper Reporses Time, "Investigations and median time internation to respond on only the san effective desiral energyment productions from the time of conditions to the term separate lating produced by most of contractions from the sime of conditions to the time and endotions to the time and endotions to the time and endotions to the sime produced invested or the contractions of the conditions and conditions originately from 512 calls and calls made directly to the collider's unless the conditions. The disk saude deferments the arrange time and endought time that he provided in tourness as defend 00.1124/1123 (a) as applicamental information, not as a metric.

		Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of	Count of	
Year /	Count of		≥ 10 Min			≥25 Min		≥ 35 Min				≥SS Min	Count of
Month	< 05 Min	< 10 Min	< 15 Min	< 20 Min	< 25 Min	< 30 Min	< 35 Min	< 40 Min	< 45 Min	< 50 Min	< 55 Min	< 60 Min	≥ 60 Min
2022	50	57	176	193	245	276	164	131	142	95	63	105	500
1	- 6	1	2	15	27	10	10	11	9	14	8	- 5	36
2	1	5	8	15	28	20	10	20	11	7	10	10	39
3	- 5	0	36	2	1	53	1	2	25	1	2	21	35
4	0	4	11	26	27	19	20	20	11	11	4	8	33
5	7	1	42	0	2	49	2	2	24	1	0	16	36
- 6	7	- 6	8	19	33	18	12	8	11	7	- 6	10	45
7	- 4	4	11	17	28	21	22	18	12	9	3	4	40
	3	16	8	17	26	22	12	8	3	- 4	7	- 5	41
9	5	7	12	20	16	23	19	11	20	9	7	5	55
10	5	3	10	23	16	15	20	9	9	13	9	7	42
11	- 4	7	17	23	23	14	20	14	- 6	15	- 4	11	46
12	3	3	11	16	18	12	16	18	11	7	3	- 4	52

The below is presented as supplemental information as noted in the metric description for Metric #8 and #9: "Median time to shut-in gas when an uncontrolled or unplanned gas release occurs on a main. The data used to determine the median time shall be provided in increments as defined in GO 112-F 123.2 (c) as supplemental information, not as a metric."

		Response time 5 minutes or less	Response time more than 5, but less than 10 minutes	Response time more than 10, but less than 15 minutes	Response time more than 15, but less than 20 minutes						Response time more than 45, but not more than 60 minutes	Response time more than 60 minutes
2022	Main	0	0	0	0	0	0	1	2	1	5	156
2022	Services	0	0	2	3	8	12	20	33	27	73	388
2021	Main	0	0	0	0	0	0	0	1	0	3	145
2021	Services	0	1	1	3	6	7	8	14	7	41	315
2020	Main	0	0	0	0	1	0	1	4	5	10	187
2020	Services	0	2	4	6	12	20	23	27	27	82	434
2019	Main	0	0	0	1	0	0	2	0	2	12	232
2019	Services	1	1	3	8	15	18	34	30	35	108	604
2018	Main	1	0	0	0	0	0	3	1	1	8	252
2018	Services	0	3	2	10	17	26	27	42	31	103	773
2017	Main	0	0	0	1	1	1	2	2	0	7	216
2017	Services	0	0	3	6	16	22	26	28	25	62	817

The below is presented as supplemental information as noted in the metric description for Metric #11 - "...The data used to determine the average time and median time shall be provided in increments as defined in GO 112-F 123.2 (c) as supplemental information, not as a metric."

Multi-color of supplied and Units Multi-color of supplied from of garbas or disregate in Multi-color of supplied from of garbas or disregate in Multi-color of supplied from one of supplied and Units Multi-color of supplied from one of supplied supplied in Multi-color of supplied from one of supplied supplied in Multi-color of supplied from one of supplied supplied in Multi-color of supplied from one									2022								
Basin Name 16 2005-1709 Basin Name 16 2005-1709 Basin Name 16 2005-1709 Basin Name 16 2005-1705 Basin Name 1			Operating Per	iods and Units	which a field response was initiated on a non-emergency basis due to an Operator's qualified representative determining, based on the Operator's procedures and information provided by the reporting party, the reported condition as being non-hazardous and not requiring of an		Response time 5	than 5, but less than	than 10, but less	than 15, but less	than 20, but less	than 25, but less	than 30, but less	than 35, but less	than 40, but less	than 45, but not more than 60	
Sam Diligo Sam Disco Sam Dis					16,879												
Leak Damage Rendered Non-Hazardoxo 2 7 5 10 27 52 00 158 198 813 After Basiness Hours (MF-1704-0758) San Dilego I SN OEDO I 14 Cynardox Responder On Scene 1548 31 33 119 226 225 222 176 113 151 Leak Damage Rendered Non-Hazardoxo 4 3 10 6 17 40 60 87 93 344 Westender-Holdsby Westender-Holdsby San Dilego I SN OEDO I 14 Cynardox Responder On Scene 1548 4 3 10 6 17 40 10 87 93 344				(M-F 0800-1700)													
A A A A A A A A A A A		San Diego	SAN DIEGO			4109	155	127	385	580		625	458	369	257		
After Basiness Hours (RF (TR4-STB)) San Diagon (SAN DECD) 15 Cyperator Reproduce On Score 1548 31 33 119 226 282 253 222 176 113 151 151 151 151 151 151 151 151 151				Leak/Damage Rendered	Non-Hazardous		2	7	5	10	27	52	90	158	198	813	2747
San Diago SAN DEGIO 14 Coperator's Responder On Science 1548 31 33 119 226 225 222 176 113 151	11																
Look/Damage Rendered Non-Hazardous		Aft	ter Business Ho	urs (M-F 1701-0759)													
Westerderholdsday		San Diego	SAN DIEGO	1st Operator's Responde	r On Scene	1648	31	33	119	226	282	253	222	176	113	151	42
San Dirigo (SAN DIEGO 1st Operator's Responder On Scene 1524 48 34 104 210 281 245 152 133 83 178				Leak/Damage Rendered	Non-Hazardous		4	3	10	6	17	40	60	87	93	384	944
San Dikgo (SAN DIECO 1st Operator's Responder On Scene 1524 48 34 104 210 281 245 152 133 83 178																	
San Dikgo (SAN DIECO 1st Operator's Responder On Scene 1524 48 34 104 210 281 245 152 133 83 178			Western	- II la II da a													
		San Diego			r On Scone	1524	40	24	104	240	201	245	152	122	92	179	
		Jago	- UNIVERSE			1029	40	54	3					133			
				gervaroused									51			324	031

							2021								
	Operating Peri	ods and Units	Number of reports of natural gas leaks or damages to which a field response was initiated on a non-emergency basis due to an Operator's qualified representative deterministic, based on the Operator's procedures and information provided by the reporting party, the apported condition as being non-basedous and not equiring of an immediate response.	Hazardous Leak Response Count		Response time more than 5, but less than 10 minutes		Response time more than 15, but less than 20 minutes		Response time more than 25, but less than 30 minutes		Response time more than 35, but less than 40 minutes	Response time more than 40, but less than 45 minutes	Response time mon than 45, but not more than 60 minutes	Response time m than 60 minute
			17,278												
	Business Hours	(M-F 0800-1700)													
San Diego	SAN DIEGO	1st Operator's Responder		4578	121										
		Leak/Damage Rendered N	ion-Hazardous		5	12	7	16	41	62	132	179	203	907	30
i	SDG&E	1st Operator's Responder	On Scene	17	0	3	1	3	3	1	2	2	1		
		Leak/Damage Rendered N	ion-Hazardous		0	0	(1	0	- 1	- 1	0	0		
	B H	rs (M-F 1701-0759)													
	SAN DIEGO	1st Operator's Responder	On Scene	1750	47	43	120	225	291	311	210	178	124	163	
		Leak/Damage Rendered N			5	12		6	10	34	69	85	108	419	9
ł	SDG&E	1st Operator's Responder	On Scene	7	0	0		3	3				0		
i		Leak/Damage Rendered N			0	0		0				0	0		
1															
	Weekends	/Holidays													
San Diego	SAN DIEGO	1st Operator's Responder	On Scene	1626	30	32	104	201	258	225	221	146	117	200	
		Leak/Damage Rendered N	lon-Hazardous		3	9		8	20	40	55	72	91	346	9
	SDG&E	1st Operator's Responder	On Scene	9	- 1	1		1	2	2	0	0	0		
i		Leak/Damage Rendered N	ion-Hazardous		0	0		0	0		1		1		

							2020								
	Operating Peri	ods and Units	Number of reports of natural gas leaks or damages to which a field response was initiated on a non-emergency basis due to an Operator's qualified representative determining, based on the Operator's procedures and information previded by the sporting party, the responsed condition as being non-hazardous and not requiring of an immediate reasons.	Hazardous Leak Response Count	Response time 5 minutes or less	Response time more than 5, but less than 10 minutes					Response time more than 30, but less than 35 minutes			Response time mor than 45, but not more than 60 minutes	e Response time m than 60 minute
		•	20,382			•			•	•	•	•	*	•	·
В	lusiness Hours	M-F 0800-1700)													
San Diego	SAN DIEGO	1st Operator's Responder 0	Dn Scene	5557	124	151	467	828	932	872	715	489	352	2 52	5
		Leak/Damage Rendered No	on-Hazardous		2	4	9	18	39	78	119	191	263	3 112	4 3
	SDG&E	1st Operator's Responder (On Scene	32	2	- 1	5	6	6	3				3	2
		Leak/Damage Rendered No	on-Hazardous		1	2	0	0	1	1	2		2	2	3
Afte	r Business Hou	s (M-F 1701-0759)													
San Diego	SAN DIEGO	1st Operator's Responder (On Scene	2117	47	41	142	238	361	300	311	193	160	24	4
		Leak/Damage Rendered No	on-Hazardous		4	5	10	8	21	31	51	94	120	45	5 1
	SDG&E	1st Operator's Responder (Dn Scene	- 11	0	0	0	- 1	3		3			2	1
		Leak/Damage Rendered No	on-Hazardous		0	0	0	0	0					2	1
Į.	Weekends														
San Diego	SAN DIEGO	1st Operator's Responder (1968	49	36	104								
		Leak/Damage Rendered No	on-Hazardous		5	4	4	7	- 11	27	60	86	107	7 41	7 1
i .	SDG&E	1st Operator's Responder 0	On Scene	7	0	0	- 1	- 1	2	1	1))
		Leak/Damage Rendered No	on-Hazardous		0	0	0	0							4

The below is presented as supplemental information as noted in the metric description for Metric #15. ".A.s a supplemental apporting environments the 69 Actual state for comparative purposes, all differs that its top croids for Actual state based on C69A reporting requirements under 6409.1 of the California Labor Code."

								- 2	013											21	014					
			1	2	3	- 6	- 5	- 6	7	- 8	9	10	11	12	1	2	1	- 4	S	- 6	7	- 8		10	11	12
	and Fatalities (Serious	Number of Serious Injuries	0	0	0	0	1	1	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	1	1	1
		Number of Fatalities	0	0		0	0	0		0	0		0	0	0	0	0	0		0	0	0		0	0	0

The below is prevented as supplemental information as noted in the metric description for Motific 815 * "...AL a supplemental reporting real-memorates the 69 Actual State for comparative purposes, oil utilizies chall also provide 69 Actual data based on CSHA reporting requirements under 6408.1 of the California Labor Code."

								21	525											_	1016												1017												2018					
			1	2	3	4	- 5	- 6	7	- 8	9	10	11	12	1	2	1	- 4	- 5	6	7	- 2	9	10	11	12	1	2	2	- 4	- 5	6	7	1	9	10	11	12	1	2	3	- 6	- 5	- 6	7	- 8	9	10	11	12
Employee See and Fatalities Injuries - mon	erious injuries es (Serious onthiy)	Number of Serious Injuries	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	۰	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	٥	0	0	0
Employee Ser and FataBlies monthly)	erious Injuries es (Fatalities -	Number of Fatalities	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	٥	0	0	٥	0	0	0	0	0	0	0	٥	0	0	0	0	0	0	0	0	0	0	0

The below is presented as copplemental information as noted in the ment's description for Ment's ELS * * ... As a copplemental reporting resimment to the SF Attual Rate for comparative purposes, oil wallists chall also provide SF Actual draw based on OSMA reporting enquirements under 640% of the California Labor Code. *

		г							2009										202												2	021												3022						Т
		г	1	2	3	- 6	- 5	- 6	7	- 8	3 11	0 :	1 1	2	2	1	4	S	6	7	*	9	50	11	12	1	2	2	- 4	- 5	- 6	7	1	9	10	11	12	1	2	3	- 4	- 5	- 6	7	- 8	9	10	11	. 1	ī
	Employee Serious Injuries Numb and Fatalities (Serious Seriou Injuries - monthly) Injurie	N/S	1	0	0	0	0	0	0		0 0		0 0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	٥	0		
15	Employee Serious Injuries and Fatalities (Fatalities - Batalities)	ber of lities	0	0	0	0	0	0	0				0 0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		

15	Employee Serious Injuries and Fatalities (Serious Injuries - monthly)	Number of Serious Injuries
15	Employee Serious Injuries and Fatalities (Fatalities - monthly)	Number of Fatalities

The below is presented as supplemental information as noted in the metric description for Metric 81c. "—As a supplemental reporting resistence to the SIR Actual Rate for comparative purposes, all stilluss shall also present SIR Actual data based on OSHA reporting requirements under 6400.1 of the california Labor Code."

								20	113					
			1	2	3	4	5	6	7		3	10	11	12
16	Contractor Serious Injuries and Fatalities (Serious Injuries - monthly)	Number of Serious Injuries associated with work for the reporting utility	0	1	0	0	2	0	0	0	1	0	0	0
10	Contractor Serious Injuries and Fatalities (Fatalities - monthly)	Number of Fatalities associated with work for the reporting utility	0	0	0	0	0	0	0	0	0	0	0	0

The below is presented as supplemental information as noted in the metric description for Metric 816 * ... As a supplemental reporting reulement to the SFA Actual Rate for comparative purposes, all utilities shall also provide SFA Actual data based on OSHA reporting requirements under 6409.1 of the California Labor Code.*

								21	014											20	115											21	216					
			1	2	3	4	5	6	7		3	10	11	12	1	2	3	4	5	6	7		3	10	11	12	1	2	,	4	5	6	7		3	10	11	12
	Contractor Serious Injuries and Fatalities (Serious Injuries - monthly)	Number of Serious Injuries associated with work for the reporting utility	0	0	0	0	0	0	0	1	0	2	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0
14	Contractor Serious Injuries and Fatalities (Fatalities - monthly)	Number of Fatalities associated with work for the reporting utility	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0

The below is presented an applemental information as used in the metric description for the description for the description of the metric description for the description of the description for the description of the descri

								20	117											20	115											20	19					\neg
			1	2	3	4	5	6	7		3	10	11	12	1	2			5	9	7	"	3	10	11	12	1	2	3	4	5	6	7	"	9	10	11	12
	Contractor Serious Injuries and Fatalities (Serious Injuries - monthly)	Number of Serious Injuries associated with work for the reporting utility	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0
16	Contractor Serious Injuries and Fatalities (Fatalities - monthly)	Number of Fatalities associated with work for the reporting utility	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The billion is promitted in applicated production of a solid rate and the billion is included by promitted and production as which is the count to express the ST - Many included and production as the solid and production as the solid and production as the solid and the companion and the solid and the companion and the solid and the solid and the production and the solid and the

							2	020											20	21												2022					
		1	2	3	4	5	6	7		3	10	11	12	1	2	3	4	5	6	7		3	10	11	12	1	2	,	4	5	6	7		9	10	11	12
Contractor Serious Injuries and Fatalities (Serious Injuries - monthly)	Number of Serious Injuries associated with work for the reporting utility	0	0	0	0	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0
Contractor Serious Injuries and Fatalities (Fatalities - monthly)	Number of Fatalities associated with work for the reporting utility	0	a	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0