



Clay Faber - Director  
Federal & CA Regulatory  
8330 Century Park Court  
San Diego, CA 92123  
cfaber@semprautilities.com

November 5, 2019

**ADVICE LETTER 3461-E  
(U902-E)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: QUARTERLY ADVICE LETTER RELATED TO PUBLIC UTILITIES CODE  
SECTION 8389(e)(7)**

Per Public Utilities Code Section 8389(e)(7), San Diego Gas & Electric Company (SDG&E) hereby submits to the California Public Utilities Commission (Commission) this Tier 1 Advice Letter (AL) that details the implementation of both its approved wildfire mitigation plan and recommendations of the most recent safety culture assessment, and a statement of recommendations of the board of directors safety committee meetings that occurred during the quarter.<sup>1</sup>

**PURPOSE**

The purpose of this AL is to comply with the requirements of Section 8389(e)(7), which were added to the Public Utilities Code by Assembly Bill (AB) 1054 on July 12, 2019. That statutory provision requires that SDG&E file a Tier 1 AL "on a quarterly basis that details the implementation of both its approved wildfire mitigation plan and recommendations of the most recent safety culture assessment, and a statement of recommendations of the board of directors safety committee meetings that occurred during the quarter." While Section 8389(e)(7) also requires that the AL "shall summarize the implementation of safety committee recommendations from the electrical corporation's previous advice letter filing," this is SDG&E's first AL filing and so there are no recommendation from a previous advice letter filing to summarize at this time.

**BACKGROUND**

Governor Newsom signed AB 1054 into law on July 12, 2019. AB 1054 contains numerous statutory provisions and amendments designed to enhance the mitigation and prevention of catastrophic wildfires – including wildfires linked to utility equipment – in California. AB 1054 added Section 8389 to the Public Utilities Code. Section 8389(e) establishes the requirements for annual safety certifications<sup>2</sup> and, *inter alia*, requires electrical corporations to establish a safety committee of its board of directors composed of members with relevant safety experience,

---

<sup>1</sup> This AL includes information relating to activities that occurred in the third quarter of 2019, as well as some activities that occurred in the fourth quarter of 2019. SDG&E will also file a subsequent AL that will include information relating activities that occurred in the fourth quarter of 2019.

<sup>2</sup> SDG&E received its initial safety certification from the Commission via a letter from the Executive Director dated July 26, 2019.

establish board-of-director-level reporting to the Commission on safety issues, and file quarterly Tier 1 ALs as described above.

## **DISCUSSION**

### **Implementation of SDG&E's Approved Wildfire Mitigation Plan**

SDG&E is currently tracking 54 different mitigations proposed in its 2019 Wildfire Mitigation Plan.<sup>3</sup> These mitigations involve situational awareness, which informs SDG&E's risk models and helps prioritize infrastructure replacement; vegetation management activities; as well as provide tools for real time decision making during emergency response or Power Safety Power Shutoff (PSPS) events. SDG&E is tracking mitigations like inspection and maintenance programs, infrastructure replacement programs, and vegetation management programs which all mitigate the risk of ignitions due to a fault on the electric system. SDG&E has also proposed mitigations that reduce the impact of a wildfire once an ignition has occurred, including high definition cameras, ground and aerial fire suppression resources, and a fuels management program. In addition, SDG&E has proposed mitigations to the customer impacts associated with PSPS events including the installation of remote switches to limit the customers exposed to PSPS, the establishment of customer resource centers during PSPS events, and SDG&E's customer outreach programs.

In Attachment A hereto, SDGE provides a detailed breakdown of the current progress on all these individual mitigations. In summary, SDG&E has fire hardened 110 miles of the electric system and replaced 2,250 structures within the high fire threat district from January 1, 2019 through October 31, 2019.

### **Implementation of SDG&E's Most Recent Safety Culture Assessment**

SDG&E has not yet undergone a Commission-initiated safety culture assessment. Accordingly, SDG&E has no information to report regarding implementation. Once SDG&E's safety culture assessment is completed, SDG&E will include implementation information in future advice letters.

### **Recommendations of the Board of Directors Safety Committee in the Third Quarter of 2019**

The SDG&E Board of Directors Safety Committee (Safety Committee)<sup>4</sup> advises and assists the Board of Directors in the oversight of safely providing electric and natural gas services to the Company's customers. The Safety Committee held meetings on September 9, 2019 and November 4, 2019 in which it received presentations from SDG&E management and employees. In the course of both meetings, the Safety Committee asked questions and engaged with SDG&E management and employees regarding the subjects of their presentations.

At the September 9 meeting, the Safety Committee received presentations from SDG&E management and employees regarding safety issues. Caroline Winn, SDG&E's Chief Operating Officer, presented an update on the Community Wildfire Safety Advisory Council (Community Advisory Council). SDG&E established the Community Advisory Council, comprised of independent community members who possess extensive public safety and wildfire experience, to advise the Safety Committee. The Community Advisory Council will meet two to four times per year. Ms. Winn discussed the composition of the Community Advisory Council and indicated that the first meeting would be held on September 10, 2019.

---

<sup>3</sup> SDG&E's 2019 Wildfire Mitigation Plan was approved in D.19-05-039.

<sup>4</sup> The Safety Committee members include Erbin B. Keith, Chairman; Robert J. Borthwick; and Trevor I. Mihalik.

Jonathan Woldemariam, SDG&E's Director of Wildfire Mitigation & Vegetation Management, briefed the Safety Committee on vegetation management activities in the high fire threat district. Mr. Woldemariam reviewed the significant work performed in the first half of the year, vegetation management enhancements in the Wildfire Mitigation Plan, and continued advancements in technology, community, safety and recognition.

Brian D'Agostino, SDG&E's Director of Fire Science and Climate Adaptation, provided the Safety Committee with background on weather technology enhancements to meteorological operations and mobile situational awareness. Mr. D'Agostino also reported that the Company has conducted several community events to increase stakeholder awareness and stated that new CPUC requirements for customer notifications have been incorporated into processes and technologies.

Lastly, Ms. Winn and Mr. D'Agostino provided an outlook on the 2019 summer and fire season outlook, as well as preparation efforts, including engaging in simulation drills and preparing emergency communications.

The Safety Committee also discussed the Safety Committee Charter, which the SDG&E Board of Directors adopted on July 17, 2019.

At the November 4 meeting, the Safety Committee received presentations from SDG&E management and employees regarding safety issues. Ron Kiralla, SDG&E's Director of Safety, provided an update on contractor safety issues.

Caroline Winn provided after action reports from key events, including a gas event in Pacific Beach, and October Red Flag events in SDG&E's service territory. Ms. Winn also provided an update on the Community Advisory Council.

John Jenkins, SDG&E's Vice President for Electric System Operations, provided a status update on SDG&E's implementation of its Wildfire Mitigation Plan.

Karen Sedgwick, SDG&E's Chief Human Resources and Chief Administrative Officer, discussed the SDG&E safety incentive compensation plan measures and weightings.

Lastly, Erbin Keith, Chair of the Safety Committee, discussed the Safety Committee recommendations to be adopted and included in this letter. Those recommendations include the following:

1. SDG&E should inform the Safety Committee Members of any significant safety event affecting SDG&E's customers or its workforce.
2. SDG&E should establish regular reporting from its executives with safety-related responsibilities or oversight to the Safety Committee.
3. SDG&E should study, to the extent possible based on available information, the causes of the recent catastrophic wildfire ignitions linked to PG&E or SCE equipment for purposes of developing "lessons learned."
4. SDG&E should continue its practice of holding a series of Emergency Operations drills simulating major catastrophic events, including a wildfire ignition.

SDG&E's Board of Directors have recently adopted revisions to the Safety Committee Charter. See Attachment B hereto. The revisions are intended to sharpen and streamline the Charter. Among other changes, the revisions enhanced the specificity of the "Purpose" statement; clarified the Safety Committee's duties and responsibilities, including vis-à-vis the full Board of Directors; and made clear that the Safety Committee will annually review and revise the Charter.

**Implementation of Recommendations of the Board of Directors Safety Committee in the Prior Quarter**

As noted above, this is the first quarterly AL that SDG&E is filing in compliance with Section 8389(e)(7), and it covers activities that occurred in the third quarter of 2019. Accordingly, there is no implementation information to provide at this time. SDG&E will, however, provide implementation information in future quarterly ALs.

**EFFECTIVE DATE**

SDG&E believes this submittal is subject to Energy Division disposition and should be classified as Tier 1 (effective pending disposition) pursuant to GO 96-B. SDG&E respectfully requests that this AL become effective on November 5, 2019, which is the date of submittal.

**PROTEST**

Anyone may protest this Advice Letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received no later than November 25, 2019, which is within 20 days of the date this Advice Letter was filed with the Commission. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of Energy Division at [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov) of the Energy Division. A copy of the protest should also be sent via e-mail to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Megan Caulson  
Regulatory Tariff Manager  
E-mail: [MCaulson@semprautilities.com](mailto:MCaulson@semprautilities.com)

**NOTICE**

A copy of this filing has been served on the utilities and interested parties shown on the attached list, including interested parties to service lists R.18-10-007 and R.18-12-005, by either providing them a copy electronically or by mailing them a copy hereof, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by e-mail at [SDG&ETariffs@semprautilities.com](mailto:SDG&ETariffs@semprautilities.com).

---

CLAY FABER  
Director – Federal & CA Regulatory

cc: Elizaveta Malashenko, CPUC Deputy Director for Safety and Enforcement



# ADVICE LETTER SUMMARY

## ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: San Diego Gas & Electric (U902)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Megan Caulson  
 Phone #: 858-654-1748  
 E-mail: Mcaulson@sdge.com  
 E-mail Disposition Notice to: SDG&ETariffs@sdge.com

EXPLANATION OF UTILITY TYPE  
 ELC = Electric      GAS = Gas      WATER = Water  
 PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 3461-E

Tier Designation: 1

Subject of AL: Quarterly Advice Letter Related to Public Utilities Code Section 8389(e)(7)

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: PUC 8389(e)(7)

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: N/A

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested?  Yes  No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes  No

Requested effective date: 11/5/19

No. of tariff sheets: None

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

<sup>1</sup>Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name: Megan Caulson  
Title:  
Utility Name: San Diego Gas & Electric  
Address: 8330 Century Park Court, CP32C  
City: San Diego  
State: California Zip: 92123  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email: [MCaulson@sdge.com](mailto:MCaulson@sdge.com)

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: District of Columbia Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Clear Form

General Order No. 96-B  
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

<u>Public Utilities Commission</u> <u>Office of Ratepayer Advocates (ORA)</u> R. Pocta <u>Energy Division</u> M. Ghadessi M. Salinas L. Tan R. Ciupagea Tariff Unit	<u>Clean Power Research</u> T. Schmid G. Novotny <u>Davis Wright Tremaine LLP</u> J. Pau <u>Douglass &amp; Liddell</u> D. Douglass D. Liddell <u>Ellison Schneider Harris &amp; Donlan LLP</u> E. Janssen C. Kappel <u>Energy Policy Initiatives Center (USD)</u> S. Anders <u>Energy Regulatory Solutions Consultants</u> L. Medina <u>Energy Strategies, Inc.</u> K. Campbell <u>EQ Research</u> General <u>Goodin, MacBride, Squeri, &amp; Day LLP</u> B. Cragg J. Squeri <u>Green Charge</u> K. Lucas <u>Hanna and Morton LLP</u> N. Pedersen <u>JBS Energy</u> J. Nahigian <u>Keyes &amp; Fox, LLP</u> B. Elder <u>Manatt, Phelps &amp; Phillips LLP</u> D. Huard R. Keen <u>McKenna, Long &amp; Aldridge LLP</u> J. Leslie <u>Morrison &amp; Foerster LLP</u> P. Hanschen <u>MRW &amp; Associates LLC</u> General	<u>NLine Energy</u> M. Swindle <u>NRG Energy</u> D. Fellman <u>Pacific Gas &amp; Electric Co.</u> M. Lawson M. Huffman Tariff Unit <u>RTO Advisors</u> S. Mara <u>SCD Energy Solutions</u> P. Muller <u>Shute, Mihaly &amp; Weinberger LLP</u> O. Armi <u>Solar Turbines</u> C. Frank <u>SPURR</u> M. Rochman <u>Southern California Edison Co.</u> K. Gansecki <u>TerraVerde Renewable Partners LLC</u> F. Lee <u>TURN</u> M. Hawiger <u>UCAN</u> D. Kelly <u>US Dept. of the Navy</u> K. Davoodi <u>US General Services Administration</u> D. Bogni <u>Valley Center Municipal Water Distr</u> G. Broomell <u>Western Manufactured Housing Communities Association</u> S. Dey <u>Interested Parties</u> R.18-10-007 R.18-12-005
<u>CA Energy Commission</u> B. Penning B. Helft <u>Advantage Energy</u> C. Farrell <u>Alcantar &amp; Kahl LLP</u> M. Cade K. Harteloo <u>AT&amp;T</u> Regulatory <u>Barkovich &amp; Yap, Inc.</u> B. Barkovich <u>Braun &amp; Blaising, P.C.</u> S. Blaising D. Griffiths <u>CA Dept. of General Services</u> H. Nanjo <u>California Energy Markets</u> General <u>California Farm Bureau Federation</u> K. Mills <u>California Wind Energy</u> N. Rader <u>City of Poway</u> Poway City Hall <u>City of San Diego</u> F. Ortlieb B. Henry L. Azar Y. Lu D. Heard <u>Clean Energy Renewable Fuels, LLC</u> P. DeVille		

## **ATTACHMENT A**

SDG&E'S 2019 WILDFIRE MITIGATION PLAN PROGRESS UPDATE



# SDG&E's 2019 Wildfire Mitigation Plan (WMP) Progress Update

---

All data as of October 31, 2019

# Wildfire Mitigation Plan Activities Summary



Operational Practices			Vegetation Management			Situational Awareness		
4.1.1.1 – Operate based on normal, elevated, and extreme conditions	4.1.1.2 – Disable reclosing during elevated or higher conditions	4.1.1.3 – Restrict high risk work during elevated or higher conditions	4.4.1 – Create a tree database for analysis	4.4.2 – Increase inspections within the HFTD	4.4.3 – Increase post trim clearance to 25' within the HFTD	4.5.1 – Creates a Fire Science and Climate Adaptation department	4.5.2 – Perform analysis of weather data to inform circuit risk	4.5.3 – Publish Fire Potential Index to inform Operations
4.1.4.1 – Send fire suppression crews to support electric crews	4.1.4.2 – Aerial resources available for CalFire Dispatch year round	4.1.4.3 – Ground fire suppression resources available for dispatch year round	4.4.4 – Utilize technology to prioritize trimming and hardening efforts	4.4.5 – Audit the trimming to ensure quality and compliance	4.4.6 – Inspect and remove “hazard trees” that could fall into lines	4.5.4 – Utilize SAWTI to gauge severity of Santa Ana Wind events	4.5.5 – Utilize wildfire simulation model to understand the impacts of ignitions	4.5.6 – Utilize camera networks to improve response times to fires
4.1.4.5 – Create ignition database and perform root cause analysis	4.1.4.6 – Clear fuels on BLM land and 13 priority circuits		4.4.7 – Clear vegetation at the base of poles with equipment	4.4.8 – Jointly inspect facilities with CalFire	4.4.9 – Perform inspections in high risk areas prior to red flag events	4.6.1 – Collaborate with stakeholders to better understand the impacts of climate change	4.6.2 – SDG&E will install 500 wireless fault indicators	4.6.3 – Add 13 weather stations to SDG&E’s weather network
Plans for Inspection			Public Safety Power Shutoff					
4.2.1 – Complete distribution Inspections	4.2.2 – Complete substation inspections	4.2.3 – Complete transmission inspections	4.7.1 – SDG&E utilizes PSPS as a last resort mitigation	4.7.2 – SDG&E patrols lines before re-energizing after PSPS events	4.7.3 – SDG&E notifies its customers in five languages of impending PSPS events	4.7.4 – SDG&E continues to collaborate with key community stakeholders		
4.3.1 – Leverage design and construction standards	4.3.2 – SDG&E looks to apply new technologies to mitigate wildfire risk	4.3.3 – SDG&E performs facility analysis to inform risk models and prioritization	4.3.4 – SDG&E has created a formal wildfire mitigation strategy and governance team	4.3.5 – SDG&E has formed a centralized asset management group	4.3.6 – SDG&E plans to harden 10 miles of transmission lines (outside of CNF)	4.3.7 – SDG&E plans to underground 1.25 miles of overhead in 2019	4.3.8 – SDG&E plans to harden 80 miles of distribution lines within the HFTD	4.3.9 – SDG&E plans to replace 700 wood pole structures within the HFTD
4.3.1.1 – SDG&E plans to replace 2250 fuses within the HFTD	4.3.1.2 – SDG&E plans to replace 500 hot line clamps within the HFTD	4.3.1.3 – SDG&E plans to harden 5.7 miles of distribution lines in the wildland urban interface	4.3.1.4 – SDG&E will develop standards and work methods for covered conductor	4.3.1.5 – SDG&E will enable falling conductor protection on 8 circuits	4.3.1.6 – SDG&E will install LTE equipment and fiber backhaul within the HFTD	4.3.1.7 – SDG&E has installed over 200 remote switching devices within the HFTD	4.3.1.8 – SDG&E will install seven additional remote switching devices	4.3.20 – SDG&E installs back up generation to mitigate the impacts of PSPS



# Q3 Activity Status vs 2019 Goals



## Operational Practices

**Operating Conditions**  
**112 days**  
 Operated in elevated or higher condition

**Operating Conditions (4.1.1)**

**Volume vs 2019 Goal:** SDG&E has operated in elevated or higher condition 112 days in 2019.  
**Key Actions:** SDG&E continues to define and change it's operating procedures based on its conditions which are defined by SDG&E's fire potential index. These are defined as normal, elevated, and extreme.

**Other Special Work Procedures**  
**Complete**

**Other Special Work Procedures (4.1.3)**

**Volume vs 2019 Goal:** 100% of days elevated or higher, SDG&E has implemented special work procedures.  
**Key Actions:** SDG&E ensures that on elevated days, electric crews are accompanied by fire suppression crews to ensure safety. On extreme days, certain activities are stopped altogether within the HFTD.

**Aviation Firefighting Program**  
**3**  
 Aerial fire suppression resources available

**Aviation Firefighting Program (4.1.4.2)**

**Volume vs 2019 Goal:** SDG&E has three aerial fire suppression resources available year-round in 2019.  
**Key Actions:** These assets have made a combined 239 drops of including 182,734 gallons of water. This does not include the October 24<sup>th</sup> – 26<sup>th</sup> red flag event where they were instrumental in suppressing multiple fires in San Diego County

**Ignition Management Program**  
**On Track**

**Ignition Management Program (4.1.4.5)**

**Volume vs 2019 Goal:** SDG&E has secured a resource for this role in June and the database has been developed.  
**Key Actions:** The ignition management program lead has begun to collect data and perform root cause analysis on ignitions.

**Recloser Protocols**  
**Complete**

**Recloser Protocols (4.1.2)**

**Volume vs 2019 Goal:** 100% of days elevated or higher, SDG&E has disabled reclosing and enabled sensitive protections on it's reclosers within the HFTD in an effort to mitigate the risk of wildfire.

**Wildfire Infrastructure Protection Teams**  
**Complete**

**Wildfire Infrastructure Protection Teams (4.1.4.1)**

**Volume vs 2019 Goal:** 100% of days elevated or higher, wildfire infrastructure teams join SDG&E electric crews to provide fire suppression capabilities during high risk work. These crews are also there to support re-energization during PSPS events.

**Industrial Fire Brigade**  
**Complete**

**Industrial Fire Brigade (4.1.4.3)**

**Volume vs 2019 Goal:** Industrial fire brigade resource has been secured and is available year-round in 2019.  
**Key Actions:** This fire suppression resource responds to active fire events caused by SDG&E equipment. They are equipped with a liquid foam truck which can extinguish oil fires caused by transformers

**Fuels Management Program**  
**58%** Surveys complete  
**100%** Fuels cleared

**Fuel Management (4.1.4.6)**

**Volume vs 2019 Goal:** 211/372 (58%) surveys complete. 111/111 (100%) fuels cleared around surveyed structures.  
**Key Actions:** SDG&E has initiated fuels management on BLM land and 1.3 priority circuits.

Complete

Ahead of Plan

On Track

Off Track

# Q3 Activity Status vs 2019 Goals



## Plans for Inspection

Distribution System Inspection

100%

QA/QC

99%

Detailed

### Distribution System Inspection (4.2.1)

**Volume vs 2019 Goal:** 10,000 of 10,000 poles completed QA/QC inspection (100%), 47,598 of 47,850 poles completed for detailed inspection (99%)

**Key Actions:** SDG&E completes remediations within 6 months in tier 3 HFTD per general orders, and within 12 months in the tier 2 HFTD

Substation System Inspection

87%

Substations inspected

### Substation System Inspection (4.2.2)

**Volume vs 2019 Goal:** 260 of 300 substation inspected (87%)  
**Key Actions:** SDG&E completes substation inspections and remediations in accordance with general order 174

Transmission System Inspection

100%

Structures inspected

### Transmission System Inspection (4.2.3)

**Volume vs 2019 Goal:** 6,730 of 6,730 OH Structures inspected (100%)  
**Key Actions:** Transmission inspections and remediations are completed in accordance with general orders and the filed maintenance plan with the California ISO.

Geographic Information Data System

Complete

### Geographic Information System Data (4.2.4)

**Volume vs 2019 Goal:** The GIS portal to share information with CALOES during emergency and PSPS events has been implemented.  
**Key Actions:** SDG&E has successfully shared GIS information through the portal on multiple activations in 2019

Complete

Ahead of Plan

On Track

Off Track

# Q3 Activity Status vs 2019 Goals



## System Hardening (1 of 3)

<p><b>Design and Construction Standards</b></p> <p><b>Complete</b></p>	<p><b>Design and Construction Standards (4.3.1)</b>  <b>Key Actions:</b> SDG&amp;E designs and constructs its transmission and distribution system in accordance with it's standards.</p>
<p><b>Facility Analysis</b></p> <p><b>Complete</b></p>	<p><b>Facility Analysis (4.3.3)</b>  <b>Key Actions:</b> SDG&amp;E has completed the actions performed in the facilities analysis section of the WMP. This information informs SDG&amp;E's risk models and helps with the prioritization of wildfire mitigation</p>
<p><b>Asset Management</b></p> <p><b>On Track</b></p>	<p><b>Asset Management (4.3.5)</b>  <b>Key Actions:</b> The asset management group has been stood up, and they are in the process of publishing asset strategies and are developing asset health index tools.</p>
<p><b>Undergrounding Circuit Line Segments</b></p> <p><b>120%</b> Undergrounded</p>	<p><b>Underground Circuit Line Segments (4.3.7)</b>  <b>Volume vs 2019 Goal:</b> 1.5 of 1.25 miles undergrounded (120%)  <b>Key Actions:</b> SDG&amp;E has exceeded its goal for the year and plans to begin construction on an additional mile of underground in November</p>

<p><b>Testing and Deploying Emerging Technologies</b></p> <p><b>Complete</b></p>	<p><b>Testing and Deploying Emerging Technologies (4.3.2)</b>  <b>Key Actions:</b> SDG&amp;E continues to evaluate and implement emerging technologies. Examples this year include the installation of falling conductor protection, the installation of the Cal Fire approved fuses, and the completion of vendor selection and standards for covered conductor.</p>
<p><b>Oversight of Activities in the Rural Areas</b></p> <p><b>Complete</b></p>	<p><b>Oversight of Activities in the Rural Areas (4.3.4)</b>  <b>Key Actions:</b> This governance and strategy role has evolved in 2019 with the creation of the Wildfire Mitigation Department.</p>
<p><b>Overhead Trans. and Dist. Fire Hardening</b></p> <p>Trans. <b>70%</b> Dist. <b>62%</b> Hardened</p>	<p><b>Overhead Transmission and Distribution Fire Hardening (4.3.6)</b>  <b>Volume vs 2019 Goal:</b> 7 of 10 miles of transmission hardened (70%); 49 of 80 miles of distribution hardened (62%)  <b>Key Actions:</b> SDG&amp;E continues the hardening of it's 69kV transmission system and is on track to finish all transmission circuits within the HFTD by 2025.</p>
<p><b>Cleveland National Forest Fire Hardening</b></p> <p><b>69%</b> Hardened</p>	<p><b>Cleveland National Forest Fire Hardening (4.3.8)</b>  <b>Volume vs 2019 Goal:</b> 47 of 68 miles hardened (69%)  <b>Key Actions:</b> Includes both transmission and distribution fire hardening of lines within the Cleveland National Forest</p>

# Q3 Activity Status vs 2019 Goals



## System Hardening (2 of 3)

**Fire Risk Mitigation**  
**62%**  
 Complete

### Fire Risk Mitigation (4.3.9)

**Volume vs 2019 Goal:** 49 of 80 miles complete (62%)  
**Key Actions:** FIRM continues to replace small high-risk conductor with high tensile strength conductor, it's replaced 370 miles program to date.

**Pole Risk Mitigation and Engineering**  
**71%**  
 Hardened

### Pole Risk Mitigation and Engineering (4.3.10)

**Volume vs 2019 Goal:** 495 of 700 poles hardened (71%)  
**Key Actions:** Program is ahead of schedule, PRIME plans to replace over 800 poles in 2019.

**Expulsion Fuse Replacement**  
**61%**  
 Fuses replaced

### Expulsion Fuse Replacement (4.3.11)

**Volume vs 2019 Goal:** 1369 of 2250 fuses replaced (61%)  
**Key Actions:** Program is on track to meet goal by 4<sup>th</sup> quarter

**Hotline Clamps**  
**53%**  
 Hotline clamps removed

### Hotline Clamps (4.3.12)

**Volume vs 2019 Goal:** 263 of 500 hotline clamps removed (53%)  
**Key Actions:** Program is on track to meet goal by 4<sup>th</sup> quarter.

**Wire Safety Enhancement**  
**75%**  
 Enhanced

### Wire Safety Enhancement (4.3.13)

**Volume vs 2019 Goal:** 4.3 of 5.7 miles enhanced (75%)  
**Key Actions:** Installation have been completed in the wild land urban interface in Rancho Santa Fe, and in the costal canyons of La Jolla.

**Covered Conductor**  
**On Track**

### Covered Conductor (4.3.14)

**Key Actions:** Distribution Standard have selected covered conductor vendors and are on track to complete standards and work methods for this new equipment by the 4<sup>th</sup> quarter of 2019

**Fire Threat Zone Advanced Protection**  
**75%**  
 Enabled

### Fire Threat Zone Advanced Protection (4.3.15)

**Volume vs 2019 Goal:** 6 of 8 circuits enabled with falling conductor protection (75%)

**LTE Communication Network**  
**On Track**

### LTE Communication Network (4.3.16)

**Key Actions:** LTE equipment and fiber back haul installations have begun in 2019.

Complete Ahead of Plan On Track Off Track

# Q3 Activity Status vs 2019 Goals



## System Hardening (3 of 3)

### Automated Reclosers

**200**  
Installed

### Automated Reclosers (4.3.17)

**Key Actions:** SDG&E has over 200 remote reclosers installed within the HFTD and continues to install more in an effort to be more targeted in PSPS events

### Pole Replacement and Reinforcement

**587**  
Poles replaced

### Pole Replacement and Reinforcement (4.3.19)

**Volume vs 2019 Goal:** SDG&E has replaced 587 poles found through the GO165 visual and intrusive inspections within the HFTD.

### PSPS Engineering Enhancements

**57%**  
Installed

### Public Safety Power Shutoff Engineering Enhancements (4.3.18)

**Volume vs 2019 Goal:** 4 of 7 switches installed (57%)  
**Key Actions:** SDG&E continues to expand switch installations within the HFTD to mitigate the impacts of PSPS

### Backup Power for Resilience

**On Track**

### Backup Power for Resilience (4.3.20)

**Key Actions:** 8 of 9 Community Resource Centers (CRC) have been fitted with a transfer switch allowing for generator hookup during PSPS. 48 of 79 medical baseline customers identified have been offered generators. 36 of 48 have received the generator, been trained on its use, and are considered complete. Upgrades to HPWREN systems in backcountry fire stations are on target for completion by end of year.

Complete

Ahead of Plan

On Track

Off Track

7

# Q3 Activity Status vs 2019 Goals



## Vegetation Management (1 of 2)

Tree Database  
**455,000**  
 Trees inventoried

**Tree Database (4.4.1)**  
 Volume vs 2019 Goal: YTD 455,000 trees in inventory

Patrol and Pruning  
**Complete**

**Patrol and Pruning (4.4.2)**  
 Key Actions: Bamboo and Century Plant off cycle Patrols are Complete

Enhanced Inspections, Patrols, and Trimming  
**On Track**

**Enhanced Inspections, Patrols, and Trimming (4.4.3)**  
 Volume vs 2019 Goal: 81,000 trees targeted for enhanced 25-foot post prune clearance or complete removal. Post Red flag Warning patrols in specified HFTD Circuits.  
 Key Actions: 28 of 28 circuits completed off cycle patrols and trimming (100%)

Technology  
**On Track**

**Technology (4.4.4)**  
 Key Actions: Utilized Meteorological data to completed first phase of Vegetation Risk Index (VRI).

Quality Assurance  
**65%**  
 HFTD audits complete

**Quality Assurance (4.4.5)**  
 Key Actions: Slight impact to Schedule as a result of Red Flag Warning and fires keeping crews safe and outside the affected areas. Currently one-month delay. Working voluntary OT and weekends. HFTD audits are 65% complete.

Hazard Tree Removal and Right Tree-Right Place  
**7,458** Removed  
**400** Replaced

**Hazard Tree Removal and Right Tree-Right Place (4.4.6)**  
 Key Actions: YTD completed 7,458 tree removals and replacing 400 trees

Pole Brushing  
**100%** Mech. brushing & chem app. complete  
**96%** Re-clear cycle complete

**Pole Brushing (4.4.7)**  
 Key Actions: 100% Mechanical brushing and Chem applications are complete. Currently 96% Complete in re-clear cycle (Red Flag is delaying schedule)

Electrical Equipment Training  
**Off Track**

**Electric Equipment Training (4.4.8)**  
 Key Actions: Cal Fire is not available for training or joint inspections in 2019. Cal Fire did commit to scheduling training in 2020.





# Q3 Activity Status vs 2019 Goals



## Vegetation Management (2 of 2)

Red Flag Operations  
**On Track**

### Red Flag Operations (4.4.9)

**Key Actions:** Tree Trim Crews have been staged during each Red flag Warning event at the request of the EDO.



Complete



Ahead of Plan



On Track



Off Track

# Q3 Activity Status vs 2019 Goals



## Situational Awareness (1 of 2)

**Fire Science and Climate Adaptation Department**  
**Complete**

**Fire Science and Climate Adaptation Department (4.5.1)**  
**Volume vs 2019 Goal:** This department was formed in 2018  
**Key Actions:** This department forms the foundation for situational awareness, emergency response, and hardening prioritization

**Fire Potential Index**  
**Complete**

**Fire Potential Index (4.5.3)**  
**Volume vs 2019 Goal:** SDG&E has published an FPI every business day in elevated or higher conditions 112/112 days (100%)  
**Key Actions:** SDG&E leverages the FPI to inform it's operating conditions and procedures

**WRRM - Operational System**  
**29**  
Simulations published

**Wildfire Risk Reduction Model – Operational System (4.5.5)**  
**Key Actions:** SDG&E has published 29 fire simulations which inform impact analysis of fires without suppression to get an idea of the structures, customers, and SDG&E infrastructure that is at risk due to an ignition. This tool is used to prioritize hardening efforts.

**Climate Change Adaptation**  
**On Track**

**Climate Change Adaptation (4.6)**  
**Key Actions:** SDG&E collaborates with the San Diego Association of Governments(SANDAG) and educational institutions to better understand the impacts of climate change, and how to best mitigate these impacts. SDG&E has an internal climate advisory group that advices on climate-based decisions.

**Meteorological Cap. and Tech.**  
**On Track**

**Meteorological Capabilities and Technologies (4.5.2)**  
**Volume vs 2019 Goal:** SDG&E's weather network has grown from 177 to 190 in 2019.  
**Key Actions:** Leveraging SDG&E's dense weather network, SDG&E performs statistical analysis to model risk on individual electric circuits

**Santa Ana Wildfire Threat Index**  
**Complete**

**Santa Ana Wildfire Threat Index (4.5.4)**  
**Volume vs 2019 Goal:** SDG&E developed in conjunction with US Forest Service and UCLA, and it's published every business day  
**Key Actions:** This tool allows SDG&E to gauge the severity of Santa Ana wind events

**Camera Networks and Fire Detection**  
**107**  
Cameras

**Camera Networks and Fire Detection (4.5.6)**  
**Volume vs 2019 Goal:** SDG&E has a total of 107 cameras across the service territory  
**Key Actions:** The primary use to improve fire suppression response time by triangulating locations of ignitions as soon as they occur

**Wireless Fault Indicators**  
**10%**  
Complete

**Wireless Fault Indicators (4.6.2)**  
**Volume vs 2019 Goal:** 53/500 (10.1%)  
**Key Actions:** It took longer than anticipated to ramp up this program. See appendix for more detail.

# Q3 Activity Status vs 2019 Goals



## Situational Awareness (2 of 2)

Advanced Weather Station Integration and Forecast

**Complete**

**Advanced Weather Station Integration and Forecast (4.6.3)**

**Volume vs 2019 Goal:** Added 13 of 13 weather stations (100%)

**Key Actions:** This year, SDG&E has installed a software enhancement on 105 of it's 190 weather stations which allows for reads every 30 seconds, a significant improvement from reads every 10 minutes. This enables better real time decision making.



Complete



Ahead of Plan



On Track



Off Track

# Q3 Activity Status vs 2019 Goals



## Public Safety Power Shutoff

Strategy for Minimizing Public Safety Risk

Complete

**Strategy for Minimizing Public Safety Risk (4.7.1)**

**Key Actions:** SDG&E continues to use Power Safety Power Shutoff as a last resort mitigation during the most extreme weather events of the year. In 2019 SDG&E has activated PSPS protocols on three events, and have utilized PSPS twice

Communication Practices

Complete

**Communication Practices (4.7.4)**

**Key Actions:** SDG&E has implemented notification procedures in five languages to keep our customers informed of potential and impending PSPS events utilizing multiple channels of communication as outlined in SDG&E's wildfire mitigation plan.

Public Safety Power Shutoff Protocols

Complete

**Public Safety Power Shutoff Protocols (4.7.2)**

**Key Actions:** Before re-energizing customers after a PSPS event, SDG&E confirms with meteorology that the peak winds have passed, and 100% of the circuit is patrolled by ground or helicopter to ensure no damage occurred during the event.

Mitigating the Public Safety Impact of PSPS Protocols

Complete

**Mitigating the Public Safety Impact of PSPS Protocols (4.7.5)**

**Key Actions:** SDG&E has and continues to communicate with key stakeholders as outlined in SDG&E's Wildfire Mitigation Plan

Complete

Ahead of Plan

On Track

Off Track

# Appendix

---

## Off Track Activity Details

# 2019 WMP Off Track Activities – Details



**Off Track**

## (4.4.8) – Electric Equipment Training

**Summary:** This program was initiated as a collaboration with CalFire. Both SDG&E and CalFire are required to perform inspections in compliance with PRC 4292 and 4293. SDG&E and CalFire jointly perform these inspections so that CalFire better understands the electrical equipment and so that SDG&E better understands the wildfire risk of the area.

**Progress/Challenges:** SDG&E offered to train CalFire employees on electrical equipment at the beginning of 2019, but they didn't have resources available to complete the training. They plan on being available for this training in 2020.

**Off Track**

## (4.6.20) Wireless Fault Indicators 53/500 (10%)

**Summary:** This program was initiated to improve response time to outages and potential ignitions once they occur on the system. On the rural lines, there are often many miles of distribution overhead downstream of sectionalizing devices. By installing wireless fault indicators, SDG&E can know very quickly what location the fault, and therefore the potential ignition occurred, providing information on where to aim our cameras so CalFire and dispatch fire suppression resources.

**Progress/Challenges:** As of today, all the jobs have been scoped, designed, and sent to construction services for installation. SDG&E anticipates seeing significant progress in this area over the last quarter, as this installation is very simple and requires no outages. But given SDG&E is only 10% complete with one quarter left, this program is given the off-track status. The challenges around this program were competing internal and external resources.

## **ATTACHMENT B**

### REVISED SAFETY COMMITTEE CHARTER

# San Diego Gas & Electric Company

---

## Safety Committee Charter

---

*The Safety Committee (the “Committee”) is a committee of the Board of Directors of San Diego Gas & Electric Company (the “Company”). Its original charter was adopted by the Board on July 17, 2019, and a revised charter was adopted by the Board on November 4, 2019.*

### I

#### Purpose

The purpose of the Committee is to advise and assist the Company’s board of directors (the “Board”) in the oversight of safely providing electric and natural gas services to the Company’s customers (“*Safety Matters*”).

### II

#### Structure

##### 2.1 Membership

The Committee consists of not fewer than two members of the Board. The Committee’s members, including its chair, are appointed by the Board. The Board also may appoint one or more directors as alternate members of the Committee to replace any absent member at any Committee meeting.

All Committee members and alternate Committee members serve at the pleasure of the Board and any member or alternate member may be removed, with or without cause, by the Board.

##### 2.2 Power and Authority

In addition to the powers and responsibilities expressly delegated to the Committee in this charter, the members of the Committee may exercise any other powers or authority as are not inconsistent with this charter or the parameters from time to time established by the Board and which are reasonably necessary to perform their duties and obligations and to carry out any other responsibilities as are from time to time delegated to it by the Board.

The powers and responsibilities delegated to the Committee may be exercised in any manner as the Committee deems appropriate (including delegation to subcommittees or working groups of the Committee) and without any requirement for Board approval, except as otherwise required by applicable law or the Company’s charter or bylaws or as otherwise is specified in this charter or the authority delegated by the Board. While acting within the scope of the powers and



responsibilities delegated to it, the Committee may exercise all the powers and authority of the Board and, to the fullest extent permitted by law, has the authority to determine which matters are within the scope of such delegated powers and authority.

The Committee will be provided by the Company the resources and authority necessary to discharge its purpose, responsibilities and duties. The Committee has the sole authority to retain and terminate its own independent consultants and other advisors and experts (“*Professional Advisors*”) and legal counsel (“*Legal Counsel*”) and also may use the services of the Company’s regular counsel (whether in-house or outside counsel) or other advisors to the Company as deemed appropriate by the Committee. The Company will provide appropriate funding, as determined by the Committee, for payment of compensation to Professional Advisors and Legal Counsel retained by the Committee.

### **2.3 Procedures**

The Committee will determine its own rules of procedure with respect to the call, place, time and frequency of its meetings. In the absence of such rules, the Committee will meet at the call of its chair, or any member of the Committee, as appropriate to accomplish the purposes of the Committee. Meetings may be attended in person, by telephone conference or by video conference. Notice of meetings of the Committee will be given as provided in the Company’s bylaws.

A majority or, if an even number, fifty percent (50%), of the members of the Committee will constitute a quorum for the transaction of business.

Directors who are not members of the Committee may attend and observe meetings of the Committee, but shall not be entitled to vote. The Committee may, at its discretion, include in its meetings members of management or any other person, including, but not limited to, its Professional Advisors and Legal Counsel, whose presence the Committee believes to be desirable and appropriate.

In the absence of the Committee’s chair at a meeting, the Committee members in attendance may appoint an acting chair from the members attending the meeting.

The chair of the Committee or the acting chair will report on the Committee’s activities to the Board at appropriate times and as otherwise requested by the chairman of the Board or the lead independent director.

### **2.4 Committee Secretary**

The Committee shall appoint a secretary for its meetings who shall keep minutes of the proceedings and carry out other functions as may be assigned from time to time by the Committee or the Committee chair.

### III

#### Duties and Responsibilities

The Committee will at the request of the Board recommend a course of action to the Board that the Committee believes is in the best interest of the Company and its shareholders, and shall independently:

- (a) review and monitor (i) the Company's safety culture, goals, and risks; (ii) significant safety-related incidents involving employees, contractors, or members of the public; and (iii) the measures to prevent, mitigate or respond to safety-related incidents; and (iv) periodic reports on safety audits;
- (b) monitor the Company's safety performance metrics;
- (c) report to the Board from time to time on the Committee's activities and recommendations and provide advice as may be requested by the Board;
- (d) coordinate the Committee's efforts with the Company's senior management, as and when the Committee may deem necessary or advisable;
- (e) be entitled, without further authorization from the Board, to consider such issues as it may consider relevant to the performance of its duties and responsibilities with respect to the Safety Matters;
- (f) perform such other duties and responsibilities with respect to Safety Matters as may be assigned by the Board from time to time; provided, that the Committee shall not bind the Company in respect of any settlement or other similar agreement related to the Safety Matters unless such action is expressly authorized by the Board;
- (g) oversee the management and resolution of issues relating to Safety Matters at the direction of the Board; and
- (h) annually review and revise this charter, as appropriate.