

**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)**

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March 30, 2023

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**2022 SAFETY PERFORMANCE METRICS REPORT OF
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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,

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March 30, 2023

¹ 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.

² 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.

³ 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

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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)¹ 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

¹ 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.

² 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

³ 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.

⁵ 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 safety-related 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:

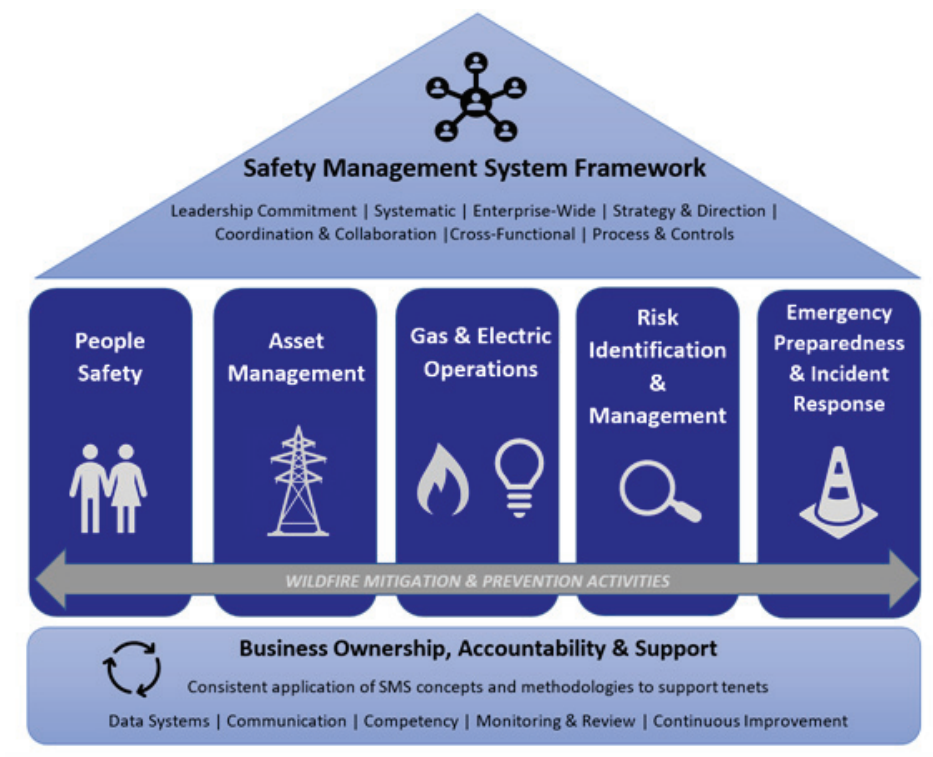
- Greater communication, broad sharing of information, and utilization of lessons learned;
- Enhanced documentation in the form of standardized processes and widely accessible document and data repositories;
- Strengthened employee feedback mechanisms, additional means/resources for consistent follow-up 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

⁷ 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 Safety	3. Electric Emergency Response	Average time in minutes	46.59
			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.

¹⁰ 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).

¹¹ 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]Time 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]Time in minutes required to stop the flow for	98.08

¹² 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 Damage Involving Medium Pressure Pipeline Failure	10. Cross Bore Intrusions ¹³	Number of cross bore intrusions per 1,000 inspections	0
	Distribution Pipeline Rupture with Ignition	11. Gas Emergency Response Time	The time in minutes [Average and Median] that a Gas Service Representative or a qualified first responder takes to respond after receiving a call which results in an emergency order.	28.60 26.08
	Catastrophic Damage Involving High-Pressure Pipeline Failure	13. Gas Pipelines That Can Be Internally Inspected ¹⁴	[Miles] Percentage	147 69%
Injuries	Employee Safety	14. Employee Days Away, Restricted and Transfer (DART) Rate	DART Cases times 200,000 divided by employee hours worked	1.03
	Employee Safety	15. Rate of Serious	Number of SIF-Actual	0.04

¹³ 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.

¹⁴ 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/employee hours worked	
	Contractor Safety	16. Rate of SIF Actual (Contractor)	Number of SIF-Actual cases among contractors x 200,000/contractor hours worked	0.03
	Employee Safety	17. Rate of SIF Potential (Employee)	Number of SIF-Potential cases among employees x 200,000/employee hours worked	0.24
	Contractor Safety	18. Rate of SIF Potential (Contractor)	Number of SIF-Potential cases among contractors x 200,000/contractor 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, wildfire	25. Wires- Down not resulting in Automatic De- energization	Percentage of wires down occurrences	17.82%
		26. Missed Inspections [I] and Patrols [P] for Electric Circuits	Percentage of structures that missed inspection relative to total required structures [Transmissi on – T; Distribution – D]	T-I 0.00% D-I 0.00% T-P 0.00% D-P 0.00%
		27. Overhead Conductor Size in High Fire Threat District (Tiers 2 and 3, HFTD)	Percentage relative to total circuit miles	7.90%
Gas	Gas safety	28. Gas Operation Corrective Actions Backlog	Percentage of work orders past due for completion in the past calendar year [Transmissi on/Distributi on]	0.00% 0.00%
Electric	Electric safety and Wildfire	29. GO-95 Corrective Actions (Tiers 2 and 3, HFTD)	Percentage of corrective actions completed [Transmissi on/Distributi on]	95.18% 99.60%
Gas	Gas Transmission and Distribution	30. Gas Overpressure Events	Number of occurrences	0/0

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

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

¹⁵ 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, near-miss 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,”¹⁷ 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

¹⁷ 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.”¹⁹ 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.²⁰ 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

¹⁸ 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.*

²⁰ *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 in-line 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,²¹ 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.

²¹ 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.²² In 2021, SCE recorded 1,103 outages caused by metallic balloons that impacted 1.6 million customers for 7,630 hours.²³ 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

²² 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>.

²³ 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

²⁷ 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.

²⁹ 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.*

³⁵ 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.”³⁸ 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

³⁶ I.16-10-015, Risk Assessment and Mitigation Phase Report of San Diego Gas & Electric Company and Southern California Gas Company (November 30, 2016).

³⁷ 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.

³⁹ 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 Actuals	2022 Imputed 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	RAMP Risk Description	2022 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

⁴⁶ 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.

⁴⁷ 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.”⁴⁸ Reprioritizing spending allows utilities to “[r]espond to immediate or short-term crises outside of the RAMP and GRC process,”⁴⁹ 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.”⁵⁰ 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

⁵¹ 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.

⁵² 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.”

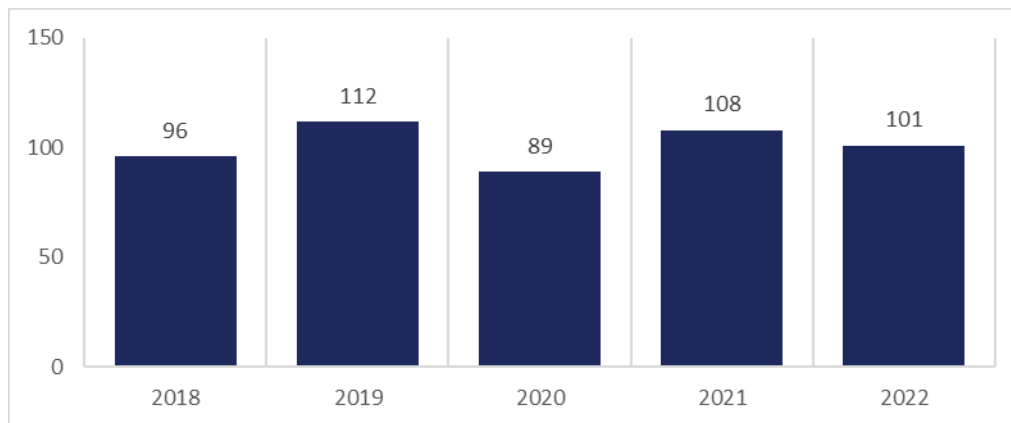
Risks: Wildfire; Transmission Overhead Conductor; Distribution Overhead Conductor Primary.

Category: Electric

Units: Number of wires down events.

Summary:

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



⁵³ 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.

⁵⁴ 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

⁵⁵ 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

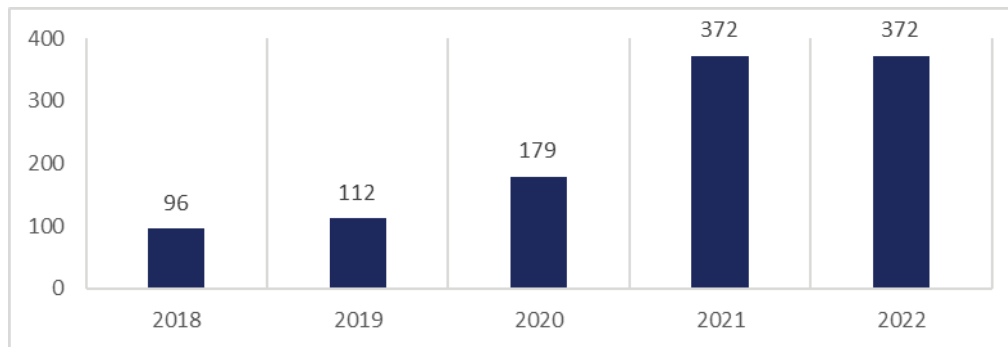
Metric Name and Description per D.21-11-009: "Transmission & Distribution (T&D) Overhead Wires Down - Major Event Days. Number of instances where an electric transmission or primary distribution conductor is broken or remains intact and falls from its intended position to rest on the ground or a foreign 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.) – [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.”

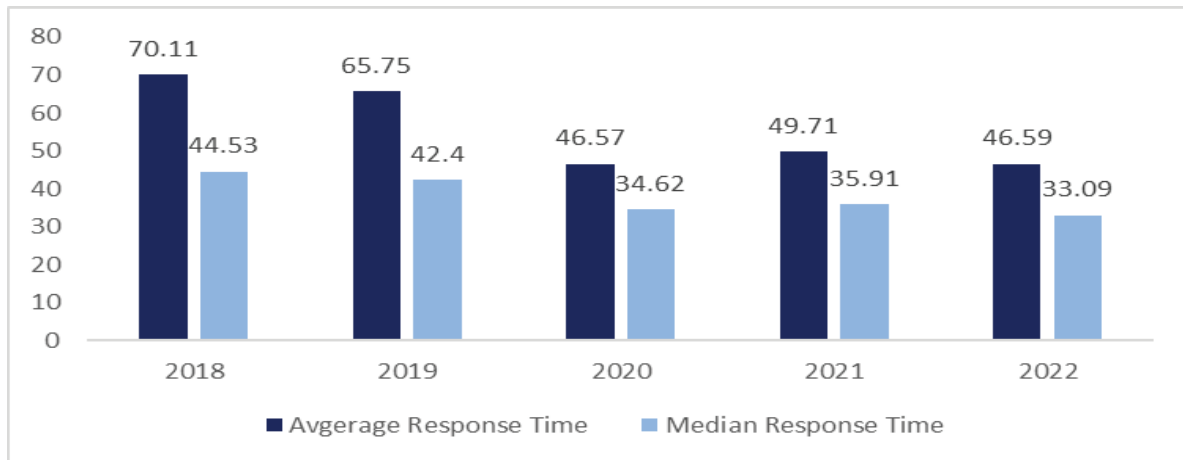
Risks: Wildfire; Overhead Conductor; Public Safety; Worker Safety.

Category: Electric

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:

Summary Chart of Electric Emergency Response Metric Data (Annual)



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.”

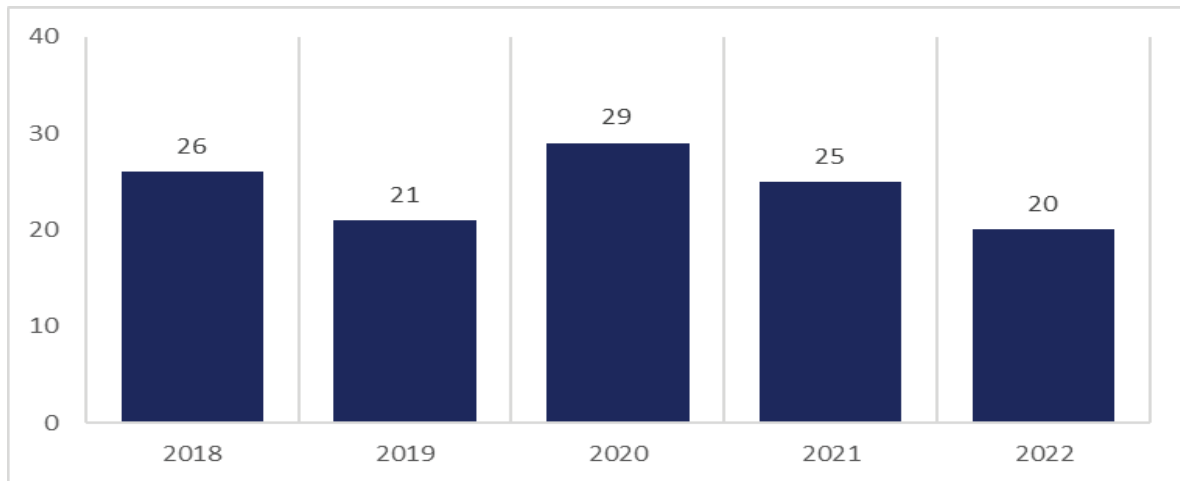
Risks: Overhead Conductor; Wildfire; Public Safety; Worker Safety; Catastrophic Event Preparedness.

Category: Electric

Units: Number of ignitions.

Summary:

Summary Chart of Fire Ignitions Metric Data (Annual)



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

⁵⁷ 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:

⁵⁸ *Id.*

⁵⁹ 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-and-safety/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.) – [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 dig-ins 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.”

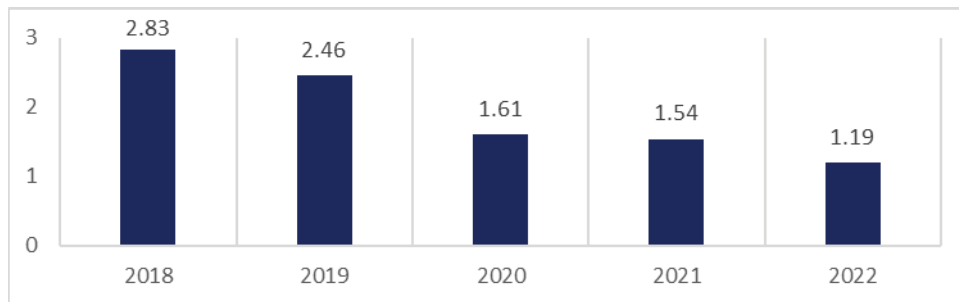
Risks: (1) Transmission Pipeline Failure - Rupture with Ignition, (2) Distribution Pipeline Rupture with Ignition (non-Cross Bore). (3) Catastrophic Damage involving Gas Infrastructure (Dig-Ins).

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.

⁶⁰ 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.”

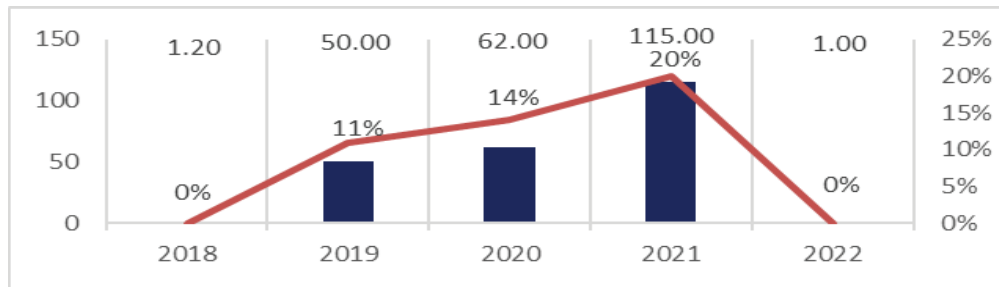
Risks: Catastrophic Damage Involving High-Pressure Pipeline Failure.

Category: Gas.

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

Summary:

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



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

tools that have been used historically. As such, a newer technology, Electromagnetic Acoustic 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.) – [Yes/No]

- No.

⁶² 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.”

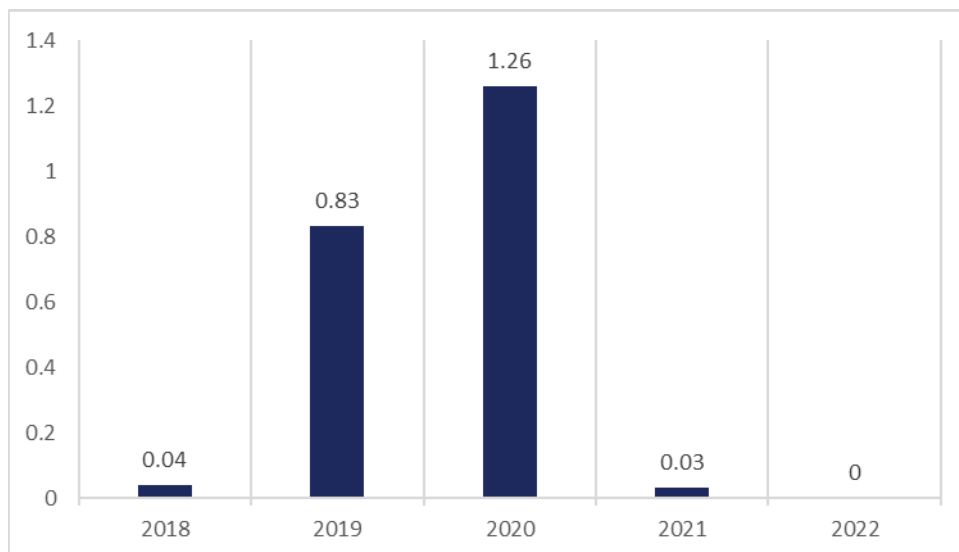
Risks: Catastrophic Damage Involving High-Pressure Pipeline Failure.

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.

⁶³ *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 bi-annual 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.) – [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.”

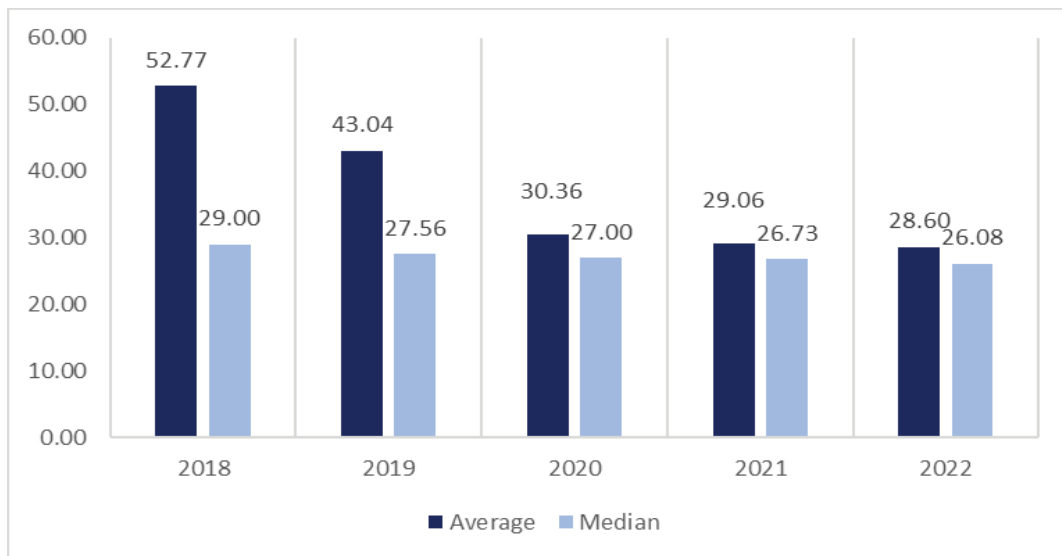
Risks: Distribution Pipeline Rupture with Ignition.

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.

Summary:

Summary Chart of Gas Emergency Average and Median Response Times Metric Data (Annual)



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 non-executive 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.”

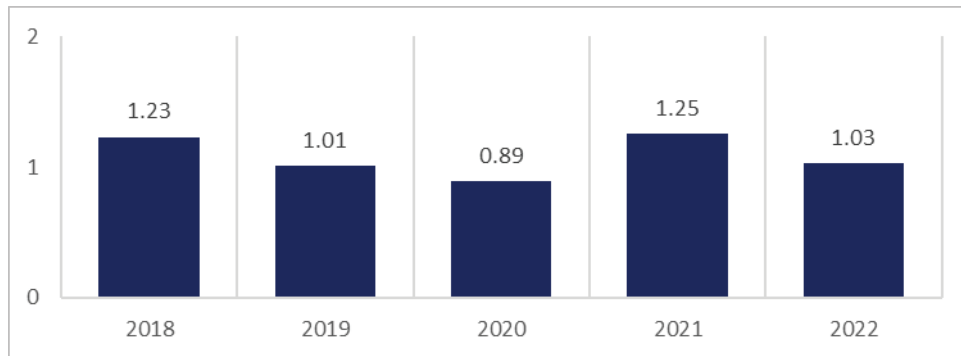
Risks: Employee Safety

Category: Injuries

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

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 non-executive 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.

⁶⁶ DART 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.

N. 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.”

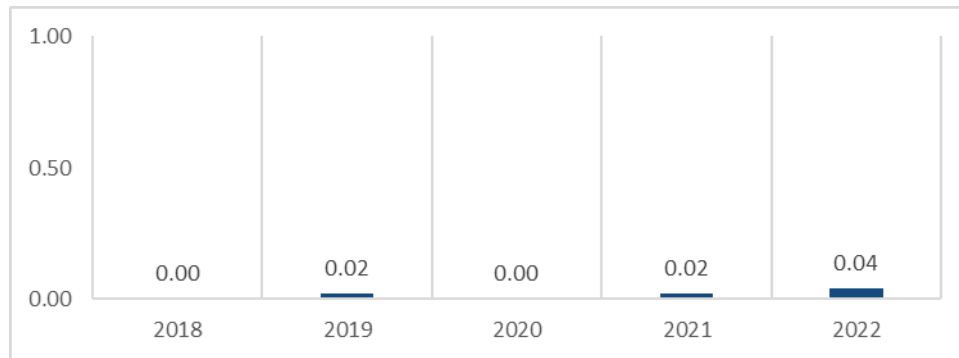
Risks: Employee Safety

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:

Employee 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. 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.
- 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-

⁶⁸ 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 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’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.”

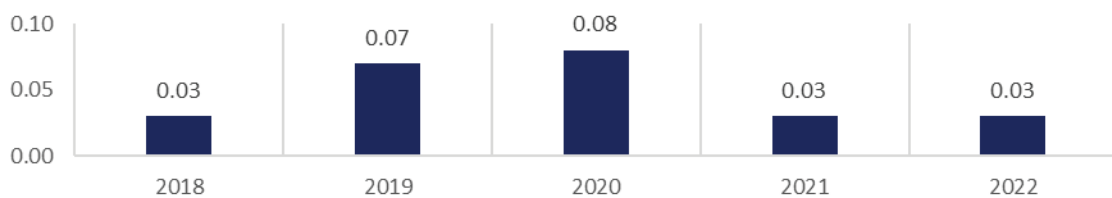
Risks: Contractor Safety

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

P. 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.”

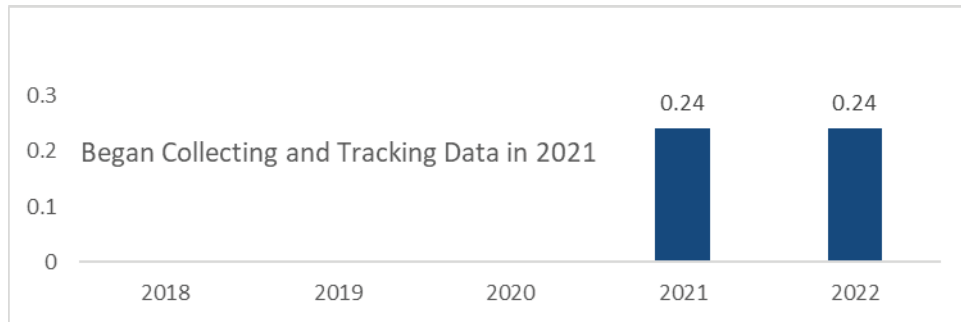
Risks: Employee Safety.

Category: Injuries.

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

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

⁶⁹ 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.

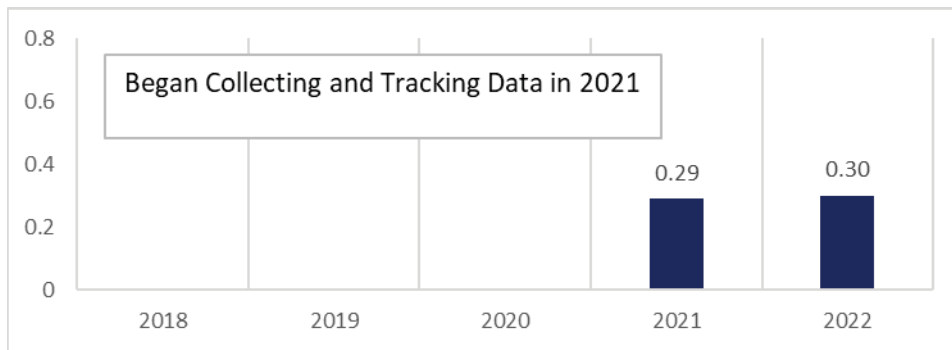
Category: Injuries.

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

⁷⁰ 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.

⁷¹ 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.

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.”⁷² 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.

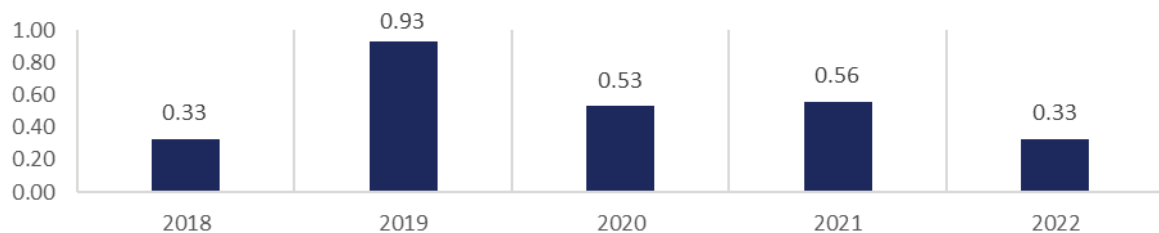
Risks: Contractor Safety.

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, ISNetwork, to house and verify the established SDG&E pre-qualification requirements for Class 1 Contractors. ISNetwork also serves as a communication portal for contractors to receive communications including:

- 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.

ISNetwork 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: $\text{DART Case Rate} = \text{Number of DART Cases} /$

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.”

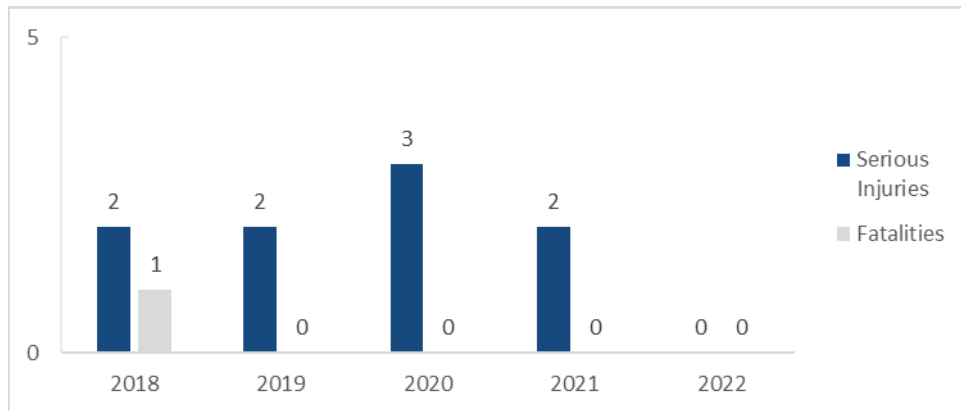
Risks: Public Safety

Category: Injuries

Units: Number of Serious Injuries and Fatalities.

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.

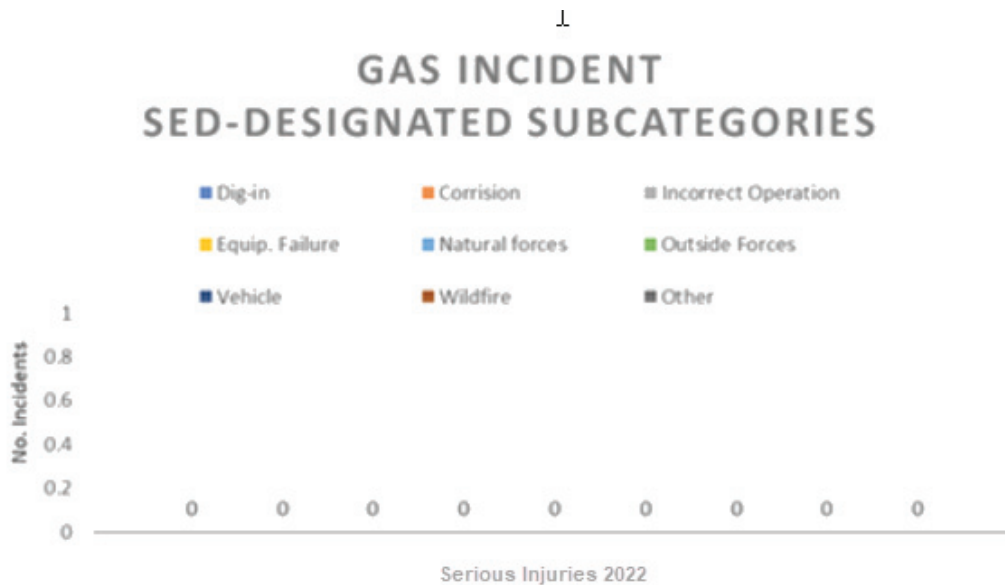
As stated in the metric description, this metric also includes utility vehicles used during business. To mitigate this risk, SDG&E utilizes the Smith System® Defensive Driving System as part of safe driving training for employees. The Smith System® was founded on the principle that most vehicle crashes 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.”⁷⁴ 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

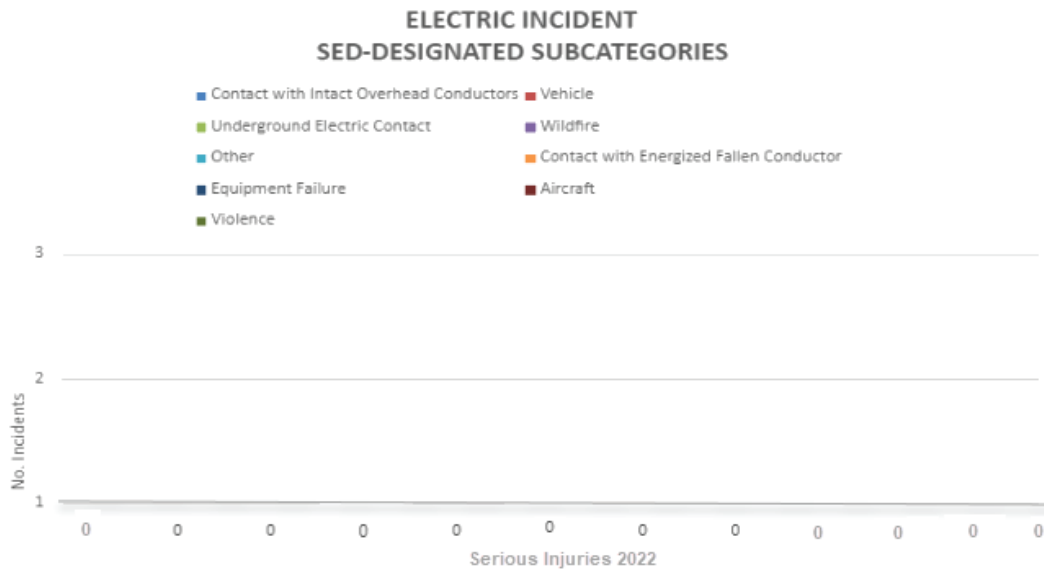


⁷³ In D.19-04-020, the Public Serious Injuries and Fatalities metric was contained in Metric 22. The modifications contained in D.21-11-009 changed the number of this metric to Metric 20. See D.21-11-009, Appendix F at 15.

⁷⁴ D.19-04-020 at 26, n.49.

⁷⁵ March 7, 2023 e-mail from Henry Sweat, SPD staff, to SDG&E representative.

⁷⁶ 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
 - Distribution System Integrity – Miles Vintage Replacement
 - Damage Prevention (Damages per USA Ticket Rate)
 - 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

⁷⁷ 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.

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				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

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

Summary:

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

Percentage relative to total circuit miles	2018	2019	2020	2021	2022
	Data collection began in June 2022				7.90%

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 Trans Dist	2019 Trans Dist	2020 Trans Dist	2021 Trans Dist	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.”

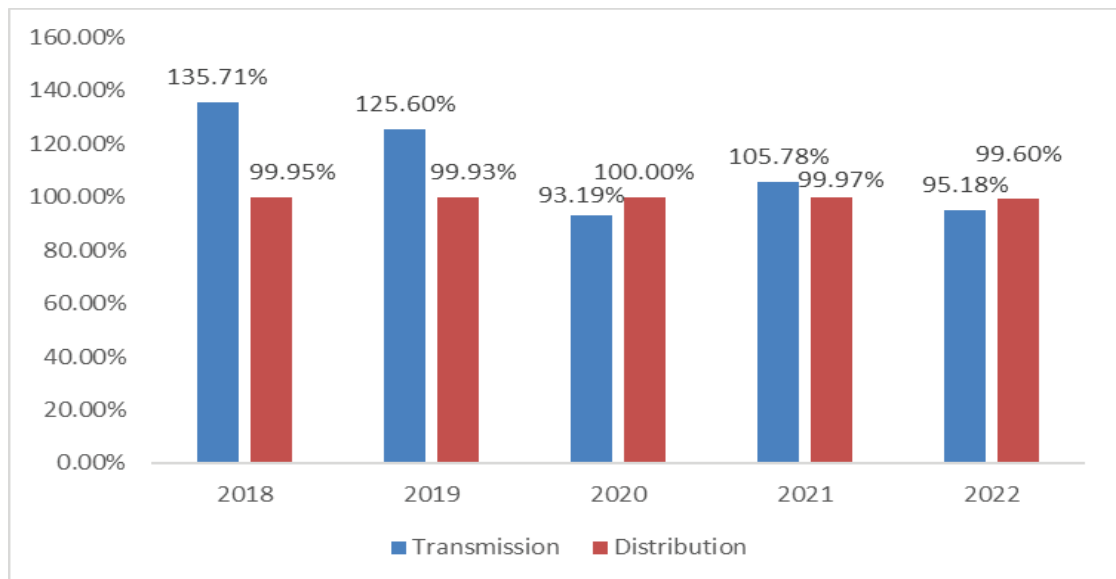
Risks: Electric Safety and Wildfire.

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.”

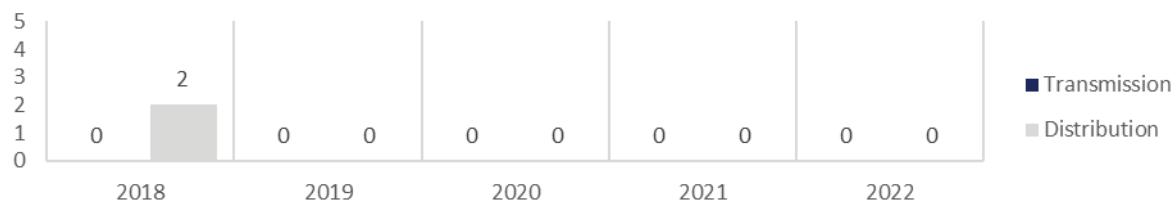
Risks: Gas Transmission and Distribution.

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

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

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.⁷⁸ 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]

The below is presented as supplemental information as noted in the matrix description for Metric #1. Electric Emergency Response Time: Average time and median time to provide its required service in 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 by the customer's utility facilities. The data used to determine the average time and median time shall be provided in increments as defined in ISO 112-F 123.2 (c) as supplemental information, not as a metric.

Year / Month	Count of < 15 Min	Count of 15-30 Min	Count of 30-45 Min	Count of 45-60 Min	Count of 60-75 Min	Count of 75-90 Min	Count of 90-105 Min	Count of 105-120 Min	Count of 120-135 Min	Count of 135-150 Min	Count of 150-165 Min	Count of 165-180 Min	Count of 180-195 Min	Count of 195-210 Min	Count of 210-225 Min	Count of 225-240 Min	Count of 240-255 Min	Count of 255-270 Min	Count of 270-285 Min	Count of 285-300 Min	Count of 300-315 Min	Count of 315-330 Min	Count of 330-345 Min	Count of 345-360 Min	Count of 360-375 Min	Count of 375-390 Min	Count of 390-405 Min	Count of 405-420 Min	Count of 420-435 Min	Count of 435-450 Min	Count of 450-465 Min	Count of 465-480 Min	Count of 480-495 Min	Count of 495-510 Min	Count of 510-525 Min	Count of 525-540 Min	Count of 540-555 Min	Count of 555-570 Min	Count of 570-585 Min	Count of 585-600 Min	Count of 600-615 Min	Count of 615-630 Min	Count of 630-645 Min	Count of 645-660 Min	Count of 660-675 Min	Count of 675-690 Min	Count of 690-705 Min	Count of 705-720 Min	Count of 720-735 Min	Count of 735-750 Min	Count of 750-765 Min	Count of 765-780 Min	Count of 780-795 Min	Count of 795-810 Min	Count of 810-825 Min	Count of 825-840 Min	Count of 840-855 Min	Count of 855-870 Min	Count of 870-885 Min	Count of 885-900 Min	Count of 900-915 Min	Count of 915-930 Min	Count of 930-945 Min	Count of 945-960 Min	Count of 960-975 Min	Count of 975-990 Min	Count of 990-1005 Min	Count of 1005-1020 Min	Count of 1020-1035 Min	Count of 1035-1050 Min	Count of 1050-1065 Min	Count of 1065-1080 Min	Count of 1080-1095 Min	Count of 1095-1110 Min	Count of 1110-1125 Min	Count of 1125-1140 Min	Count of 1140-1155 Min	Count of 1155-1170 Min	Count of 1170-1185 Min	Count of 1185-1200 Min	Count of 1200-1215 Min	Count of 1215-1230 Min	Count of 1230-1245 Min	Count of 1245-1260 Min	Count of 1260-1275 Min	Count of 1275-1290 Min	Count of 1290-1305 Min	Count of 1305-1320 Min	Count of 1320-1335 Min	Count of 1335-1350 Min	Count of 1350-1365 Min	Count of 1365-1380 Min	Count of 1380-1395 Min	Count of 1395-1410 Min	Count of 1410-1425 Min	Count of 1425-1440 Min	Count of 1440-1455 Min	Count of 1455-1470 Min	Count of 1470-1485 Min	Count of 1485-1500 Min	Count of 1500-1515 Min	Count of 1515-1530 Min	Count of 1530-1545 Min	Count of 1545-1560 Min	Count of 1560-1575 Min	Count of 1575-1590 Min	Count of 1590-1605 Min	Count of 1605-1620 Min	Count of 1620-1635 Min	Count of 1635-1650 Min	Count of 1650-1665 Min	Count of 1665-1680 Min	Count of 1680-1695 Min	Count of 1695-1710 Min	Count of 1710-1725 Min	Count of 1725-1740 Min	Count of 1740-1755 Min	Count of 1755-1770 Min	Count of 1770-1785 Min	Count of 1785-1800 Min	Count of 1800-1815 Min	Count of 1815-1830 Min	Count of 1830-1845 Min	Count of 1845-1860 Min	Count of 1860-1875 Min	Count of 1875-1890 Min	Count of 1890-1905 Min	Count of 1905-1920 Min	Count of 1920-1935 Min	Count of 1935-1950 Min	Count of 1950-1965 Min	Count of 1965-1980 Min	Count of 1980-1995 Min	Count of 1995-2010 Min	Count of 2010-2025 Min	Count of 2025-2040 Min	Count of 2040-2055 Min	Count of 2055-2070 Min	Count of 2070-2085 Min	Count of 2085-2100 Min	Count of 2100-2115 Min	Count of 2115-2130 Min	Count of 2130-2145 Min	Count of 2145-2160 Min	Count of 2160-2175 Min	Count of 2175-2190 Min	Count of 2190-2205 Min	Count of 2205-2220 Min	Count of 2220-2235 Min	Count of 2235-2250 Min	Count of 2250-2265 Min	Count of 2265-2280 Min	Count of 2280-2295 Min	Count of 2295-2310 Min	Count of 2310-2325 Min	Count of 2325-2340 Min	Count of 2340-2355 Min	Count of 2355-2370 Min	Count of 2370-2385 Min	Count of 2385-2400 Min	Count of 2400-2415 Min	Count of 2415-2430 Min	Count of 2430-2445 Min	Count of 2445-2460 Min	Count of 2460-2475 Min	Count of 2475-2490 Min	Count of 2490-2505 Min	Count of 2505-2520 Min	Count of 2520-2535 Min	Count of 2535-2550 Min	Count of 2550-2565 Min	Count of 2565-2580 Min	Count of 2580-2595 Min	Count of 2595-2610 Min	Count of 2610-2625 Min	Count of 2625-2640 Min	Count of 2640-2655 Min	Count of 2655-2670 Min	Count of 2670-2685 Min	Count of 2685-2700 Min	Count of 2700-2715 Min	Count of 2715-2730 Min	Count of 2730-2745 Min	Count of 2745-2760 Min	Count of 2760-2775 Min	Count of 2775-2790 Min	Count of 2790-2805 Min	Count of 2805-2820 Min	Count of 2820-2835 Min	Count of 2835-2850 Min	Count of 2850-2865 Min	Count of 2865-2880 Min	Count of 2880-2895 Min	Count of 2895-2910 Min	Count of 2910-2925 Min	Count of 2925-2940 Min	Count of 2940-2955 Min	Count of 2955-2970 Min	Count of 2970-2985 Min	Count of 2985-3000 Min	Count of 3000-3015 Min	Count of 3015-3030 Min	Count of 3030-3045 Min	Count of 3045-3060 Min	Count of 3060-3075 Min	Count of 3075-3090 Min	Count of 3090-3105 Min	Count of 3105-3120 Min	Count of 3120-3135 Min	Count of 3135-3150 Min	Count of 3150-3165 Min	Count of 3165-3180 Min	Count of 3180-3195 Min	Count of 3195-3210 Min	Count of 3210-3225 Min	Count of 3225-3240 Min	Count of 3240-3255 Min	Count of 3255-3270 Min	Count of 3270-3285 Min	Count of 3285-3300 Min	Count of 3300-3315 Min	Count of 3315-3330 Min	Count of 3330-3345 Min	Count of 3345-3360 Min	Count of 3360-3375 Min	Count of 3375-3390 Min	Count of 3390-3405 Min	Count of 3405-3420 Min	Count of 3420-3435 Min	Count of 3435-3450 Min	Count of 3450-3465 Min	Count of 3465-3480 Min	Count of 3480-3495 Min	Count of 3495-3510 Min	Count of 3510-3525 Min	Count of 3525-3540 Min	Count of 3540-3555 Min	Count of 3555-3570 Min	Count of 3570-3585 Min	Count of 3585-3600 Min	Count of 3600-3615 Min	Count of 3615-3630 Min	Count of 3630-3645 Min	Count of 3645-3660 Min	Count of 3660-3675 Min	Count of 3675-3690 Min	Count of 3690-3705 Min	Count of 3705-3720 Min	Count of 3720-3735 Min	Count of 3735-3750 Min	Count of 3750-3765 Min	Count of 3765-3780 Min	Count of 3780-3795 Min	Count of 3795-3810 Min	Count of 3810-3825 Min	Count of 3825-3840 Min	Count of 3840-3855 Min	Count of 3855-3870 Min	Count of 3870-3885 Min	Count of 3885-3900 Min	Count of 3900-3915 Min	Count of 3915-3930 Min	Count of 3930-3945 Min	Count of 3945-3960 Min	Count of 3960-3975 Min	Count of 3975-3990 Min	Count of 3990-4005 Min	Count of 4005-4020 Min	Count of 4020-4035 Min	Count of 4035-4050 Min	Count of 4050-4065 Min	Count of 4065-4080 Min	Count of 4080-4095 Min	Count of 4095-4110 Min	Count of 4110-4125 Min	Count of 4125-4140 Min	Count of 4140-4155 Min	Count of 4155-4170 Min	Count of 4170-4185 Min	Count of 4185-4200 Min	Count of 4200-4215 Min	Count of 4215-4230 Min	Count of 4230-4245 Min	Count of 4245-4260 Min	Count of 4260-4275 Min	Count of 4275-4290 Min	Count of 4290-4305 Min	Count of 4305-4320 Min	Count of 4320-4335 Min	Count of 4335-4350 Min	Count of 4350-4365 Min	Count of 4365-4380 Min	Count of 4380-4395 Min	Count of 4395-4410 Min	Count of 4410-4425 Min	Count of 4425-4440 Min	Count of 4440-4455 Min	Count of 4455-4470 Min	Count of 4470-4485 Min	Count of 4485-4500 Min	Count of 4500-4515 Min	Count of 4515-4530 Min	Count of 4530-4545 Min	Count of 4545-4560 Min	Count of 4560-4575 Min	Count of 4575-4590 Min	Count of 4590-4605 Min	Count of 4605-4620 Min	Count of 4620-4635 Min	Count of 4635-4650 Min	Count of 4650-4665 Min	Count of 4665-4680 Min	Count of 4680-4695 Min	Count of 4695-4710 Min	Count of 4710-4725 Min	Count of 4725-4740 Min	Count of 4740-4755 Min	Count of 4755-4770 Min	Count of 4770-4785 Min	Count of 4785-4800 Min	Count of 4800-4815 Min	Count of 4815-4830 Min	Count of 4830-4845 Min	Count of 4845-4860 Min	Count of 4860-4875 Min	Count of 4875-4890 Min	Count of 4890-4905 Min	Count of 4905-4920 Min	Count of 4920-4935 Min	Count of 4935-4950 Min	Count of 4950-4965 Min	Count of 4965-4980 Min	Count of 4980-4995 Min	Count of 4995-5010 Min	Count of 5010-5025 Min	Count of 5025-5040 Min	Count of 5040-5055 Min	Count of 5055-5070 Min	Count of 5070-5085 Min	Count of 5085-5100 Min	Count of 5100-5115 Min	Count of 5115-5130 Min	Count of 5130-5145 Min	Count of 5145-5160 Min	Count of 5160-5175 Min	Count of 5175-5190 Min	Count of 5190-5205 Min	Count of 5205-5220 Min	Count of 5220-5235 Min	Count of 5235-5250 Min	Count of 5250-5265 Min	Count of 5265-5280 Min	Count of 5280-5295 Min	Count of 5295-5310 Min	Count of 5310-5325 Min	Count of 5325-5340 Min	Count of 5340-5355 Min	Count of 5355-5370 Min	Count of 5370-5385 Min	Count of 5385-5400 Min	Count of 5400-5415 Min	Count of 5415-5430 Min	Count of 5430-5445 Min	Count of 5445-5460 Min	Count of 5460-5475 Min	Count of 5475-5490 Min	Count of 5490-5505 Min	Count of 5505-5520 Min	Count of 5520-5535 Min	Count of 5535-5550 Min	Count of 5550-5565 Min	Count of 5565-5580 Min	Count of 5580-5595 Min	Count of 5595-5610 Min	Count of 5610-5625 Min	Count of 5625-5640 Min	Count of 5640-5655 Min	Count of 5655-5670 Min	Count of 5670-5685 Min	Count of 5685-5700 Min	Count of 5700-5715 Min	Count of 5715-5730 Min	Count of 5730-5745 Min	Count of 5745-5760 Min	Count of 5760-5775 Min	Count of 5775-5790 Min	Count of 5790-5805 Min	Count of 5805-5820 Min	Count of 5820-5835 Min	Count of 5835-5850 Min	Count of 5850-5865 Min	Count of 5865-5880 Min	Count of 5880-5895 Min	Count of 5895-5910 Min	Count of 5910-5925 Min	Count of 5925-5940 Min	Count of 5940-5955 Min	Count of 5955-5970 Min	Count of 5970-5985 Min	Count of 5985-6000 Min	Count of 6000-6015 Min	Count of 6015-6030 Min	Count of 6030-6045 Min	Count of 6045-6060 Min	Count of 6060-6075 Min	Count of 6075-6090 Min	Count of 6090-6105 Min	Count of 6105-6120 Min	Count of 6120-6135 Min	Count of 6135-6150 Min	Count of 6150-6165 Min	Count of 6165-6180 Min	Count of 6180-6195 Min	Count of 6195-6210 Min	Count of 6210-6225 Min	Count of 6225-6240 Min	Count of 6240-6255 Min	Count of 6255-6270 Min	Count of 6270-6285 Min	Count of 6285-6300 Min	Count of 6300-6315 Min	Count of 6315-6330 Min	Count of 6330-6345 Min	Count of 6345-6360 Min	Count of 6360-6375 Min	Count of 6375-6390 Min	Count of 6390-6405 Min	Count of 6405-6420 Min	Count of 6420-6435 Min	Count of 6435-6450 Min	Count of 6450-6465 Min	Count of 6465-6480 Min	Count of 6480-6495 Min	Count of 6495-6510 Min	Count of 6510-6525 Min	Count of 6525-6540 Min	Count of 6540-6555 Min	Count of 6555-6570 Min	Count of 6570-6585 Min	Count of 6585-6600 Min	Count of 6600-6615 Min	Count of 6615-6630 Min	Count of 6630-6645 Min	Count of 6645-6660 Min	Count of 6660-6675 Min	Count of 6675-6690 Min	Count of 6690-6705 Min	Count of 6705-6720 Min	Count of 6720-6735 Min	Count of 6735-6750 Min	Count of 6750-6765 Min	Count of 6765-6780 Min	Count of 6780-6795 Min	Count of 6795-6810 Min	Count of 6810-6825 Min	Count of 6825-6840 Min	Count of 6840-6855 Min	Count of 6855-6870 Min	Count of 6870-6885 Min	Count of 6885-6900 Min	Count of 6900-6915 Min	Count of 6915-6930 Min	Count of 6930-6945 Min	Count of 6945-6960 Min	Count of 6960-6975 Min	Count of 6975-6990 Min	Count of 6990-7005 Min	Count of 7005-7020 Min	Count of 7020-7035 Min	Count of 7035-7050 Min	Count of 7050-7065 Min	Count of 7065-7080 Min	Count of 7080-7095 Min	Count of 7095-7110 Min	Count of 7110-7125 Min	Count of 7125-7140 Min	Count of 7140-7155 Min	Count of 7155-7170 Min	Count of 7170-7185 Min	Count of 7185-7200 Min	Count of 7200-7215 Min	Count of 7215-7230 Min	Count of 7230-7245 Min	Count of 7245-7260 Min	Count of 7260-7275 Min	Count of 7275-7290 Min	Count of 7290-7305 Min	Count of 7305-7320 Min	Count of 7320-7335 Min	Count of 7335-7350 Min	Count of 7350-7365 Min	Count of 7365-7380 Min	Count of 7380-7395 Min	Count of 7395-7410 Min	Count of 7410-7425 Min	Count of 7425-7440 Min	Count of 7440-7455 Min	Count of 7455-7470 Min	Count of 7470-7485 Min	Count of 7485-7500 Min	Count of 7500-7515 Min	Count of 7515-7530 Min	Count of 7530-7545 Min	Count of 7545-7560 Min	Count of 7560-7575 Min	Count of 7575-7590 Min	Count of 7590-7605 Min	Count of 7605-7620 Min	Count of 7620-7635 Min	Count of 7635-7650 Min	Count of 7650-7665 Min	Count of 7665-7680 Min	Count of 7680-7695 Min	Count of 7695-7710 Min	Count of 7710-7725 Min	Count of 7725-7740 Min	Count of 7740-7755 Min	Count of 7755-7770 Min	Count of 7770-7785 Min	Count of 7785-7800 Min	Count of 7800-7815 Min	Count of 7815-7830 Min	Count of 7830-7845 Min	Count of 7845-7860 Min	Count of 7860-7875 Min	Count of 7875-7890 Min	Count of 7890-7905 Min	Count of 7905-7920 Min	Count of 7920-7935 Min	Count of 7935-7950 Min	Count of 7950-7965 Min	Count of 7965-7980 Min	Count of 7980-7995 Min	Count of 7995-8010 Min	Count of 8010-8025 Min	Count of 8025-8040 Min	Count of 8040-8055 Min	Count of 8055-8070 Min	Count of 8070-8085 Min	Count of 8085-8100 Min	Count of 8100-8115 Min	Count of 8115-8130 Min	Count of 8130-8145 Min	Count of 8145-8160 Min	Count of 8160-8175 Min	Count of 8175-8190 Min	Count of 8190-8205 Min	Count of 8205-8220 Min	Count of 8220-8235 Min	Count of 8235-8250 Min	Count of 8250-8265 Min	Count of 8265-8280 Min	Count of 8280-8295 Min	Count of 8295-8310 Min	Count of 8310-8325 Min	Count of 8325-8340 Min	Count of 8340-8355 Min	Count of 8355-8370 Min	Count of 8370-8385 Min	Count of 8385-8400 Min	Count of 8400-8415 Min	Count of 8415-8430 Min	Count of 8430-8445 Min	Count of 8445-8460 Min	Count of 8460-8475 Min	Count of 8475-8490 Min	Count of 8490-8505 Min	Count of 8505-8520 Min	Count of 8520-8535 Min	Count of 8535-8550 Min	Count of 8550-8565 Min	Count of 8565-8580 Min	Count of 8580-8595 Min	Count of 8595-8610 Min	Count of 8610-8625 Min	Count of 8625-8640 Min	Count of 8640-8655 Min	Count of 8655-8670 Min	Count of 8670-8685 Min	Count of 8685-8700 Min	Count of 8700-8715 Min	Count of 8715-8730 Min	Count of 8730-8745 Min	Count of 8745-8760 Min	Count of 8760-8775 Min	Count of 8775-8790 Min	Count of 8790-8805 Min	Count of 8805-8820 Min	Count of 8820-8835 Min	Count of 8835-8850 Min	Count of 8850-8865 Min	Count of 8865-8880 Min	Count of 8880-8895 Min	Count of 8895-8910 Min	Count of 8910-8925 Min	Count of 8925-8940 Min	Count of 8940-8955 Min	Count of 8955-8970 Min	Count of 8970-8985 Min	Count of 8985-9000 Min	Count of 9000-9015 Min	Count of 9015-9030 Min	Count of 9030-9045 Min	Count of 9045-9060 Min	Count of 9060-9075 Min	Count of 9075-9090 Min	Count of 9090-9105 Min	Count of 9105-9120 Min	Count of 9120-9135 Min	Count of 9135-9150 Min	Count of 9150-9165 Min	Count of 9165-9180 Min	Count of 9180-9195 Min	Count of 9195-9210 Min	Count of 9210-9225 Min	Count of 9225-9240 Min	Count of 9240-9255 Min	Count of 9255-9270 Min	Count of 9270-9285 Min	Count of 9285-9300 Min	Count of 9300-9315 Min	Count of 9315-9330 Min	Count of 9330-9345 Min	Count of 9345-9360 Min	Count of 9360-9375 Min	Count of 9375-9390 Min	Count of 9390-9405 Min	Count of 9405-9420 Min	Count of 9420-9435 Min	Count of 9435-9450 Min	Count of 9450-9465 Min	Count of 9465-9480 Min	Count of 9480-9495 Min	Count of 9495-9510 Min	Count of 9510-9525 Min	Count of 9525-9540 Min	Count of 9540-9555 Min	Count of 9555-9570 Min	Count of 9570-9585 Min	Count of 9585-9600 Min	Count of 9600-9615 Min	Count of 9615-9630 Min	Count of 9630-9645 Min	Count of 9645-9660 Min	Count of 9660-9675 Min	Count of 9675-9690 Min	Count of 9690-9705 Min	Count of 9705-9720 Min	Count of 9720-
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The below is presented as supplemental information as noted in the metric description for Metric #1: "Electric Emergency Response Time". Average time and median time is provided in response 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 922 calls and calls made directly by the customer's utility facilities. The data used to determine the average time and median time shall be provided in increments as defined in ISO 1124 120.2 (c) as supplemental information, not as a metric.

Year / Month	Count of < 05 Min	Count of ≥ 05 Min < 10 Min	Count of ≥ 10 Min < 15 Min	Count of ≥ 15 Min < 20 Min	Count of ≥ 20 Min < 25 Min	Count of ≥ 25 Min < 30 Min	Count of ≥ 30 Min < 35 Min	Count of ≥ 35 Min < 40 Min	Count of ≥ 40 Min < 45 Min	Count of ≥ 45 Min < 50 Min	Count of ≥ 50 Min < 55 Min	Count of ≥ 55 Min < 60 Min
2022	52	17	178	313	245	218	169	111	142	88	61	50
1	5	7	21	37	28	18	11	6	14	9	5	26
2	5	8	15	19	20	10	22	11	7	10	10	29
3	6	26	38	26	48	33	8	2	20	8	21	31
4	4	11	26	17	19	25	10	11	11	6	6	31
5	7	1	42	0	2	40	2	2	24	1	0	16
6	2	6	8	10	10	12	6	11	7	6	10	25
7	4	4	11	17	28	21	22	18	12	9	9	4
8	1	16	6	17	16	21	12	8	3	4	5	21
9	5	7	12	20	16	23	10	11	10	9	7	5
10	5	9	10	21	18	21	20	9	9	14	11	7
11	4	7	17	21	21	19	20	14	6	15	4	11
12	5	9	11	16	18	12	16	10	11	7	3	4

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 20, but less than 25 minutes	Response time more than 25, but less than 30 minutes	Response time more than 30, but less than 35 minutes	Response time more than 35, but less than 40 minutes	Response time more than 40, but less than 45 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
	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
	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
	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
	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
	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
	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."

2022														
Operating Periods and Units	Number of reports of natural gas leaks or damages to which a field response was initiated on an emergency basis as determined by the reporting party, the response condition as being non-hazardous and not requiring an immediate response.	Hazardous Leak Response Count	Response time	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more
			minutes or less	than 5, but less than 10 minutes	than 10, but less than 15 minutes	than 15, but less than 20 minutes	than 20, but less than 25 minutes	than 25, but less than 30 minutes	than 30, but less than 35 minutes	than 35, but less than 40 minutes	than 40, but less than 45 minutes	than 45, but not more than 60 minutes	Response time more than 60 minutes	
16,879														
Business Hours (M-F 0800-1700)														
San Diego SAN DIEGO	1st Operator's Response On Scene	4109	155	127	385	580	694	625	458	369	257	363	36	56
	Leak/Damage Rendered Non-Hazardous		2	7	5	10	27	52	90	158	198	813	2747	
After Business Hours (M-F 1701-0759)														
San Diego SAN DIEGO	1st Operator's Response On Scene	1648	31	33	119	226	282	253	222	176	113	151	42	42
	Leak/Damage Rendered Non-Hazardous		4	3	10	6	17	40	60	87	93	384	144	
Weekends/Holidays														
San Diego SAN DIEGO	1st Operator's Response On Scene	1524	48	34	104	210	281	245	152	133	83	178	56	56
	Leak/Damage Rendered Non-Hazardous		9	6	3	14	16	33	57	80	91	324	89	

2021														
Operating Periods and Units	Number of reports of natural gas leaks or damages to which a field response was initiated on an emergency basis as determined by the reporting party, the response condition as being non-hazardous and not requiring an immediate response.	Hazardous Leak Response Count	Response time	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more
			minutes or less	than 5, but less than 10 minutes	than 10, but less than 15 minutes	than 15, but less than 20 minutes	than 20, but less than 25 minutes	than 25, but less than 30 minutes	than 30, but less than 35 minutes	than 35, but less than 40 minutes	than 40, but less than 45 minutes	than 45, but not more than 60 minutes	Response time more than 60 minutes	
17,278														
Business Hours (M-F 0800-1700)														
San Diego SAN DIEGO	1st Operator's Response On Scene	4578	121	151	344	693	818	754	536	427	276	304	35	59
	Leak/Damage Rendered Non-Hazardous		5	12	7	16	41	62	132	179	203	907	3014	
SDG&E	1st Operator's Response On Scene	17	0	3	1	3	3	1	2	2	1	0	1	1
	Leak/Damage Rendered Non-Hazardous		0	0	0	1	0	1	1	0	0	2	12	
After Business Hours (M-F 1701-0759)														
San Diego SAN DIEGO	1st Operator's Response On Scene	1750	47	43	120	225	291	311	210	178	124	163	38	38
	Leak/Damage Rendered Non-Hazardous		5	12	5	6	10	34	69	85	108	419	997	
SDG&E	1st Operator's Response On Scene	7	0	0	0	3	3	0	0	0	0	1	0	0
	Leak/Damage Rendered Non-Hazardous		0	0	0	0	1	0	0	0	0	3	3	3
Weekends/Holidays														
San Diego SAN DIEGO	1st Operator's Response On Scene	1626	30	32	104	201	258	225	221	146	117	200	82	82
	Leak/Damage Rendered Non-Hazardous		3	9	5	8	20	49	55	72	91	349	974	
SDG&E	1st Operator's Response On Scene	9	1	1	1	1	2	2	0	0	0	1	0	0
	Leak/Damage Rendered Non-Hazardous		0	0	0	0	0	0	1	0	1	1	5	5

2020														
Operating Periods and Units	Number of reports of natural gas leaks or damages to which a field response was initiated on an emergency basis as determined by the reporting party, the response condition as being non-hazardous and not requiring an immediate response.	Hazardous Leak Response Count	Response time	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more	Response time more
			5 minutes or less	than 5, but less than 10 minutes	than 10, but less than 15 minutes	than 15, but less than 20 minutes	than 20, but less than 25 minutes	than 25, but less than 30 minutes	than 30, but less than 35 minutes	than 35, but less than 40 minutes	than 40, but less than 45 minutes	than 45, but not more than 60 minutes	Response time more than 60 minutes	
20,382														
Business Hours (M-F 0800-1700)														
San Diego SAN DIEGO	1st Operator's Response On Scene	5557	124	151	467	828	932	872	715	489	352	525	102	102
	Leak/Damage Rendered Non-Hazardous		2	4	9	18	39	78	119	191	263	1124	3710	
SDG&E	1st Operator's Response On Scene	32	2	1	5	6	6	3	2	2	3	2	1	1
	Leak/Damage Rendered Non-Hazardous		1	2	0	0	1	1	2	2	2	3	18	
After Business Hours (M-F 1701-0759)														
San Diego SAN DIEGO	1st Operator's Response On Scene	2117	47	41	142	238	361	300	311	193	160	244	85	85
	Leak/Damage Rendered Non-Hazardous		4	5	10	9	21	31	51	94	120	456	1317	
SDG&E	1st Operator's Response On Scene	11	0	0	0	1	3	0	1	3	2	1	0	0
	Leak/Damage Rendered Non-Hazardous		0	0	0	0	0	0	0	0	2	1	5	
Weekends/Holidays														
San Diego SAN DIEGO	1st Operator's Response On Scene	1968	49	36	104	220	315	359	224	207	146	215	123	123
	Leak/Damage Rendered Non-Hazardous		5	4	4	7	11	27	60	89	107	417	1297	
SDG&E	1st Operator's Response On Scene	7	0	0	1	1	2	1	1	0	0	0	1	1
	Leak/Damage Rendered Non-Hazardous		0	0	0	0	0	0	0	0	1	1	1	1

	Employee Service Inquiries and Satisfaction Surveys - monthly	Number of Surveys Completed
15	Employee Service Inquiries and Satisfaction Surveys - monthly	Number of Surveys Completed

