

**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)
<b>(Not Consolidated)</b>	
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 <b>(Consolidated)</b>
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 <b>(Consolidated)</b>

**2023 SAFETY PERFORMANCE METRICS REPORT OF  
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)**

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March 29, 2024

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And Related Matter.	A.22-05-016 <b>(Consolidated)</b>

**2023 SAFETY PERFORMANCE METRICS REPORT OF  
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)**

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

Report (2023 SPMR).<sup>1</sup> This 2023 SPMR reports on the applicable 32 safety performance metrics to measure achieved safety improvements,<sup>2</sup> 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; an explanation of how the reported data reflects progress against the risk mitigation and management goals in the Company’s Test Year (TY) 2019 GRC and the 2016 SoCalGas and SDG&E RAMP filing; and a high-level summary of the total risk mitigation spend. Attachment “A” constitutes the 2023 SPMR and Attachment “B” constitutes 10 years of monthly historical data, where available, for all applicable metrics.<sup>3</sup>

Respectfully submitted,

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March 29, 2024

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<sup>1</sup> In compliance with D.21-11-009, the Risk OIR Phase One Decision, this 2023 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 General Rate Case [(GRC)] proceedings,” and on the successor S-MAP proceeding Rulemaking (R.) 20-07-013. SDG&E will also concurrently email the SPM report to RASA\_Email@cpuc.ca.gov. D.21-11-009 (issued November 9, 2021) at Ordering Paragraph 9, p. 145.

<sup>2</sup> 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.

<sup>3</sup> 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**

### **SDG&E 2023 SPMR Report**



## **2023 Safety Performance Metrics Report**

**March 29, 2024**

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Attachment A – SDG&E 2023 SPMR Report

Attachment B – Supplemental Data

# 2023 Safety Performance Metrics Report

## March 29, 2024

### I. INTRODUCTION/OVERVIEW

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

On July 16, 2020, the Commission opened R.20-07-013 as 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), 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 original SPMs, as modified by the Risk OIR Phase One Decision (which modified certain existing

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<sup>1</sup> In compliance with D.21-11-009, Ordering Paragraph 9 at 145, this 2023 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](mailto:RASA_Email@cpuc.ca.gov).



SPMs, removed certain SPMs and added new SPMs).<sup>2</sup> In accordance with both D.19-04-020 and D.21-11-009, in this Report SDG&E now reports on the 29 applicable SPMs<sup>3</sup> using the designated definitions and units for the last ten years, January 1, 2014 through December 31, 2023, where such data exists, in the accompanying Excel file (Attachment B).<sup>4</sup>

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 employees at all levels can raise concerns and offer suggestions for improvement on any safety-

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<sup>2</sup> Not all metrics adopted in D.19-04-020 and D.21-11-009 are applicable to SDG&E.

<sup>3</sup> D.21-11-009 at Appendix B.

<sup>4</sup> 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). No recommendations have been received from the CPUC Safety Policy Division (SPD) on SDG&E's 2021 and 2022 Safety Performance Metrics Reports containing the revised metrics.

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), 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, asset and safety management, 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:

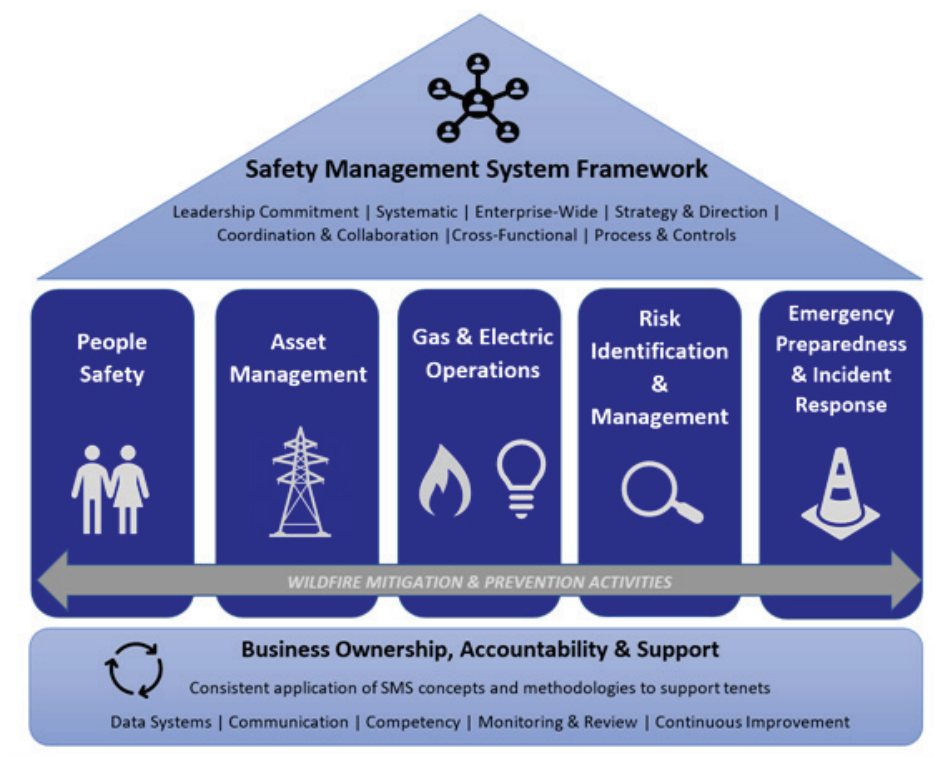
- Greater communication, broad sharing of information, and utilization of lessons learned;
- Enhanced documentation in the form of standardized processes and widely accessible document and data repositories;
- Strengthened employee feedback mechanisms, including additional means and resources for consistent 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 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. Annually, SDG&E develops a Safety Management Action Plan with data-driven goals, objectives, and measurable metrics for continuous safety culture and safety performance 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 annual Safety Management Action Plan is relatively new, SDG&E has developed goals and tracked leading and lagging safety-related metrics for numerous years (*e.g.*, Lost Time Incidents, Days Away Restricted or Transferred, Near Miss reports, Safety Observations). SDG&E is enhancing its efforts to identify and track additional leading safety-related metrics. While these efforts support SDG&E's overarching objective to continually advance its safety culture and mature as a learning organization, SDG&E is working to establish methods to utilize additional leading indicators to measure safety culture maturity. 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.<sup>5</sup>

**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 GRC proceedings and any future S-MAP proceedings.<sup>6</sup> 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.<sup>7</sup> Accordingly, SDG&E provided SPD with a preview of its Pub-SIF data on January 28, 2024. After submission and review of SDG&E's draft Pub-SIF data, SPD informed the IOUs on March 1, 2024, that there were no changes to the Pub-SIF subcategories for final reporting in this Safety Performance Metrics Report.

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<sup>5</sup> 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.

<sup>6</sup> 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.

<sup>7</sup> D.19-04-020 at 19.

## 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 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.21-11-009<sup>8</sup>*

Category	Risk(s)	Metric Name	Units	2023
Electric	Wildfire; Transmission Overhead Conductor; Distribution Overhead Conductor Primary	1. Transmission & Distribution (T&D) Overhead Wires Down <sup>9</sup>	Number of wire down events	122
	Wildfire; Transmission Overhead Conductor; Distribution Overhead Conductor Primary	2. Transmission & Distribution (T&D) Overhead Wires Down - Major Event Days <sup>10</sup>	Number of wire down events	462
	Wildfire; Overhead		Average time in minutes	47.15

<sup>8</sup> 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, 28 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.

<sup>9</sup> 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).

<sup>10</sup> 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 events and Major Event Days).

Category	Risk(s)	Metric Name	Units	2023
	Conductor; Public Safety; Worker Safety	3. Electric Emergency Response	Median time in minutes	34.16
	Overhead Conductor; Wildfire Public Safety; Worker Safety; Catastrophic Event Preparedness	4. Fire Ignitions	Number of ignitions	16
Gas	Transmission Pipeline Failure - Rupture with Ignition; Distribution Pipeline Rupture with Ignition (non-Cross Bore); Catastrophic Damage involving Gas Infrastructure (Dig-Ins)	5. Gas Dig-in	The number of 3rd party gas dig-ins per 1,000 USA tags/tickets	1.11
	Catastrophic Damage Involving High-Pressure Pipeline Failure	6. Gas In-Line Inspection (ILI)	Total number of miles of inspections performed and percentage inspected by ILI <sup>11</sup>	114 14%
	Catastrophic Damage Involving High-Pressure Pipeline Failure	7. Gas In-Line Inspection Upgrade	Miles of gas transmission lines upgraded annually to permit inline inspections	8
	Distribution Pipeline Rupture with Ignition (non-Cross Bore)	8. Gas Shut-In Time – Mains	[Median]Time in minutes required to stop the flow of gas for	416.00

<sup>11</sup> 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	2023
			Distribution Mains	
	Distribution Pipeline Rupture with Ignition (non-Cross Bore)	9. Gas Shut-In Time - Services	[Median]Time in minutes required to stop the flow of gas for Distribution Services	88.58
	Catastrophic Damage Involving Medium Pressure Pipeline Failure	10. Cross Bore Intrusions <sup>12</sup>	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.	28.30 25.90
	Catastrophic Damage Involving High-Pressure Pipeline Failure	13. Gas Pipelines That Can Be Internally Inspected <sup>13</sup>	[Total Miles] Percentage	[157] 72%
Injuries	Employee Safety	14. Employee Days Away, Restricted and Transfer (DART) Rate	DART Cases times 200,000 divided by employee hours worked	0.95

<sup>12</sup> 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.

<sup>13</sup> 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	2023
	Employee Safety	15. Rate of Serious Injuries or Fatalities (SIF) Actual (Employee)	Number of SIF-Actual cases among employees x 200,000/employee hours worked	0.00
	Contractor Safety	16. Rate of SIF Actual (Contractor)	Number of SIF-Actual cases among contractors x 200,000/contractor hours worked	0.05
	Employee Safety	17. Rate of SIF Potential (Employee)	Number of SIF-Potential cases among employees x 200,000/employee hours worked	0.19
	Contractor Safety	18. Rate of SIF Potential (Contractor)	Number of SIF-Potential cases among contractors x 200,000/contractor hours worked	0.17
	Contractor Safety	19. Contractor Days Away, Restricted Transfer (DART)	DART Cases times 200,000 divided by contractor hours worked.	0.45
	Public Safety	20. Public Serious Injuries and Fatalities	Number of Serious Injuries/ Fatalities	2/1
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”)	0

Category	Risk(s)	Metric Name	Units	2023
			per 100,000 flight hours	
Electric	Electric Overhead, wildfire	25. Wires-Down not resulting in Automatic De-energization	Percentage of wires down occurrences	22.95%
		26. Missed Inspections [I] and Patrols [P] for Electric Circuits	Percentage of structures that missed inspection relative to total required structures [Transmission – 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	7.71%
Gas	Gas safety	28. Gas Operation Corrective Actions Backlog	Percentage of work orders past due for completion in the past calendar year [Transmission /Distribution]	0.00% 0.00%
Electric	Electric safety and Wildfire	29. GO-95 Corrective Actions (Tiers 2 and 3, HFTD)	Percentage of corrective actions completed [Transmission /Distribution]	116.89% 99.23%
Gas	Gas Transmission and Distribution	30. Gas Overpressure Events	Number of occurrences [Transmission /Distribution]	0/1
	Gas Transmission	31. Gas In-Line	Number of Missed Inspections	3

Category	Risk(s)	Metric Name	Units	2023
		Inspections Missed		
Electric	Wildfire Transmission Overhead Conductor Distribution Overhead Conductor Primary	32. Overhead Conductor Safety Index	Number of occurrences per circuit mile [Transmission /Distribution]	0.00/14.56 <sup>14</sup>

### 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.”<sup>15</sup> 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 initiatives, better aligns the core operating units, and allows SDG&E to assess risk across the entire enterprise for enhanced safety performance.

<sup>14</sup> Metric #1 data has been used as a proxy for this metric. For further information, see the Metric Background discussion contained in Section V, Metric 32.

<sup>15</sup> D.19-04-020 at 28.

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 and reviewed with SDG&E 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 employee and contractor injuries, controllable motor vehicle incidents, near miss incidents, safety observations, and is actively involved in evaluating risk and developing necessary action plans. SDG&E leadership fosters a learning environment and culture of safety 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,”<sup>16</sup> 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 governmental studies and federal agencies rely on this definition of organizational culture to define ‘safety culture.’<sup>17</sup>

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<sup>16</sup> 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.

<sup>17</sup> 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).

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.”<sup>18</sup> Consistent with this definition, SDG&E 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.<sup>19</sup> As such, SDG&E created an enterprise-wide SMS to drive continuous improvement in both its safety culture and safety performance. Below are three examples of SDG&E’s recent efforts to continually improve its training programs and deploy enhancements to continually improve safety culture and safety performance, as directed by the S-MAP Phase Two Decision:

**Example 1: 2023 Employee Engagement Survey Action Plans (Metrics #14, #15, #17)**

Employee engagement is crucial to a robust safety culture. In 2023, 82% of SDG&E employees participated in the Company’s Employee Engagement Survey. The valuable feedback and survey results provide great insights that are used to create action plans and drive meaningful change. The 2023 results were positive overall and showed that a significant majority of our employees feel like valued members of their teams, feel respected in the workplace, and believe they have opportunities to learn and grow.

Overall, employees reported satisfaction with SDG&E as a place to work with a mean score of 4.27 out of 5, which is in the 85th percentile of the company-level data. Notably, the Company achieved strong scores in the areas of employees having the materials and knowledge to safely and successfully perform their job (4.32), knowing what is expected of them (4.53), and feeling that the

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<sup>18</sup> *Id.*

<sup>19</sup> *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. SCG-02-R/SDGE-02-R (Day Revised Direct) at DD-28.

company demonstrates care and concern for their safety and wellbeing (4.41). The survey also revealed that there are some opportunities for improvement.

Based on the survey results, SDG&E developed action plans targeting the following three areas of focus to drive continuous improvement:

1. **Connection:** One area of opportunity involves facilitating stronger relationships between colleagues and building deeper connections to the Company’s mission and purpose. SDG&E announced a high-density schedule with three in-office days per week in 2024, which is one of its key strategies to build opportunities for increased connection on campus.

2. **Recognition:** Another area of opportunity is to strengthen timely recognition and feedback. The Company announced a new People Developer Award to recognize employees who are making a difference by developing those around them.

3. **Development:** A third area of improvement involves building upon the strengths of each employee. The Company is creating opportunities to recognize employees who are demonstrating strong skillsets and is providing growth opportunities that leverage those skills. Identifying opportunities for continual improvement allows SDG&E to continually advance its culture of safety and improve its safety performance by keeping employees engaged and purpose-driven to help mitigate against disengagement or complacency. Engaged employees may feel more inclined to speak up, raise safety concerns, and provide safety suggestions – all contributing to a culture of safety. Disengagement and complacency may lead to a diminished safety focus and mindset.

**Example 2: SDG&E’s New Logistics Field Support program (Metrics #3, #4, #5, #8, #9, #11, and #20)**

October 2023 marked the 20-year anniversary of the Cedar Fire, one of the largest and most devastating fires in California history. SDG&E’s approach to safety, emergency preparedness, and

wildfire mitigation has transformed over the past two decades since the fire as it seeks to harness innovative solutions for enhanced safety.

As one example, after the 2003 Cedar Fire event, SDG&E created an internal program to support field operations during significant emergencies. In line with SDG&E's commitment to continuous learning and improvement, in 2023, the Operational Field & Emergency Readiness team partnered with Land Services to review and update the program with safety enhancements that align with SDG&E's overarching Incident Command System implementation efforts. Safety enhancements to the new Logistics Field Support program (replacing the previous "Business Support Liaison" program) included providing training to over 90 employees on emergency response logistics. SDG&E now has over 90 trained employees who can be deployed in the field during significant emergencies to provide logistical support and coordinate with SDG&E's Emergency Operations Center (EOC).

Responsibilities of these trained employees include:

- Proactively managing logistical support and service delivery to operations in the field and operating locations during significant emergencies.
- Providing a direct line of communication between Logistics Section Unit Representatives in the EOC and Logistics Services Representatives in the field to improve efficiency and improve communications so work can be performed safely.
- Proactively assessing and managing Logistics Section support and services to confirm effectiveness on a continuous basis.
- Engaging Operations Unit leadership and being visible as the on-site central point of contact to resolve any issues with Logistics Section support and services.
- Facilitating requests for support and services and resolving issues independently, when feasible, or with assistance from an EOC Logistics Support Unit Representative.

SDG&E's new Logistics Field Support Services program enhances employee and public safety by identifying and training a significant number of employees who can be deployed to the field to provide logistics support during emergency situations.

### **Example 3: Start Strong Safety Event (Metrics #14 and #17)**

Historically, we tend to see an increase in employee safety incidents after the start of the year. In order to combat this trend, SDG&E hosted its first annual Start Strong Safety Event in 2023. On January 30, 2023, approximately 1,300 employees – representing ~ 75% of our field and Union-represented workforce - gathered at an offsite half-day event to discuss 2022 safety successes, 2023 areas of focuses, and the importance of mental health. This first-time event was led by SDG&E's Chief Safety Officer and IBEW Local 465 Business Manager in partnership with SDG&E operational leaders. This event was unique in that it brought the majority of our field operations teams together at once. During the event, operational leaders highlighted their teams' successes, challenges, and areas for focus in 2023. The primary theme, and driving force behind the event, was a focus on mental health and suicide awareness. For the keynote speech, colleagues from NV Energy in Nevada joined to share a story of being impacted by suicide in their personal and professional lives.

This event, continued in 2024, helps start the new year off strong and convey a singular message around our safety focus. Our 2024 event focused on injury prevention and personal recovery – namely, preventing sprains and strains. Keynote Speaker, Bruce Madsen, an internationally respected authority on industrial ergonomics, shared his perspective on the keys to injury prevention and recovery. All employees were given a 2024 Challenge Coin with the personal challenge to take efforts to have a “Fit Body and Mind.” The event highlighted available resources, including our Industrial Athletic Training Program, more fully described below.



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

Safety is a core value and a major factor in any operational decision at SDG&E. 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: Gas Damage Prevention Programs (Metric #5, #8, #9, and #20)**

SDG&E's Gas Damage Prevention Program follows the SMS Plan-Do-Check-Act Cycle for continuous safety improvement. The driving force of SDG&E's Damage Prevention programs is our dedication to employee, contractor, public and system safety. SDG&E's Damage Prevention team partners with contractors, residential customers, and the broader community to ensure our system is protected. In 2023, SDG&E's Damage Prevention team established a very difficult goal – to improve on our 2022 damage rate, which was the lowest rate in SDG&E history. In 2023, their efforts resulted in the fewest damages to our system on record, finishing with a Damage Rate of 1.11, exceeding our established goal.

SDG&E's damage prevention rates have shown continuous year-over-year improvement in recent years. In 2023, SDG&E achieved its lowest gas pipeline dig-in rate (1.11; metric no. 5) in Company history. This is, in part, due to two new programs designed to provide risk prioritization, increase proactive outreach, engagement and communication, as well as enhance data collection, review, and assessment.

SDG&E's Damage Prevention Analyst (DPA) program increases engagement with excavators to educate and enforce safe digging practices and behaviors. In 2023, SDG&E's DPAs performed approximately 7,700 excavator engagements and 80 outreach events. As part of this effort, SDG&E also launched a public awareness campaign that will run through 2024 consisting of a 15-second commercial broadcast across local cable television stations and billboards throughout SDG&E's service territory to create heightened public awareness to call 811 before you dig.

SDG&E's Ticket Risk Analysis (TRA) program is another example of a proactive, preventative approach to continually improving employee, contractor, and public safety. SDG&E's TRA program focuses on 811 tickets that pose the highest risk. For high-risk potential 811 tickets, DPAs are deployed on site to oversee work and "stop the job" if unsafe practices or conditions are present. In 2023, DPAs implemented over 275 instances of stopped work to protect employee, contractor, public and system safety.

### **Example 2: Industrial Athletic Training Program (Metrics #14 and #17)**

Company employees perform physical tasks that can take a toll on their bodies over time. For example, our electric workers climb poles and lift heavy equipment, our gas workers get in and out of trucks and trenches, and our office workers may sit for long periods of time and perform repetitive motions. Soft tissue or "strain and sprain" related injuries accounted for approximately 43% of all Company OSHA recordable injuries from 2016 to 2023. In 2021, SDG&E experienced an increase in employee soft tissue injuries. To address this uptick and proactively approach soft tissue injury prevention going forward, SDG&E implemented an Industrial Athletic Training Program. SDG&E currently employs a team of Certified Industrial Athletic Strength and Conditioning Coaches.

SDG&E's Industrial Athletic Coaches specialize in mobility, biomechanics, and strength training. The Coaches support all district locations across SDG&E's service territory and also offer their services to office-based employees. The Coaches provide assessments and develop personalized stretching techniques and exercises to meet the different types of physical demands employees encounter. In 2023, SDG&E experienced a 46% reduction in strain and sprain-related injuries.

### **Example 3: Asset 360 (Metric #1, #2, and #4)**

SDG&E's Asset Management division is utilizing a data-informed 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 such assets fail. These asset health and impact models support efforts to mitigate occurrences of events captured by the Safety Performance Metrics by way of proactive replacement of assets. Asset 360 also helps improve existing models for critical assets as well as incorporate new assets into the platform. For example, using Asset 360 models, 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 asset-level risk prioritization models 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 safety culture is supported and 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.”<sup>20</sup> Benefits programs that promote employee health and welfare also contribute to SDG&E’s safety performance and culture.

In SDG&E’s TY 2024 GRC testimony, Compensation and Benefits witness Debbie Robinson explained how SDG&E’s compensation and benefits programs are designed to focus

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<sup>20</sup> D.16-06-054 at 153.

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).<sup>21</sup> 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 “[i]dentify all metrics linked to or used in any way to determine executive compensation levels and/or incentives.”<sup>22</sup> In the narrative accompanying each Safety Performance Metric, SDG&E indicates whether that specific metric is linked to determining executive compensation levels and/or incentives (*See* Section V, below). For this 2023 Safety Performance Metrics Report, SDG&E references its 2023 Executive ICP and 2023 non-executive ICP and indicates whether each metric was tied to these ICPs in 2023. 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 2024 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.

The primary components of SDG&E’s executive officer compensation are Base Pay, Variable Pay (*i.e.*, ICP), and long-term incentives under Sempra’s 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

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<sup>21</sup> A.22-05-015/016 (cons.), Ex. SCG-25-R/SDG&E-29-R (Robinson Revised Direct) at DSR-11.

<sup>22</sup> D.19-04-020, Ordering Paragraph 6.A at 63.

portion of employee total cash compensation is tied directly to safety outcomes. 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 57% of SDG&E’s 2023 Executive Incentive Compensation Plan. These safety-related measures broadly include factors related to contractor, public, employee, as well as electric and gas system safety as further detailed in the Bias Controls section of each applicable metric. 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.”<sup>23</sup> The SDG&E compensation component that comprises “executive incentive compensation” is Variable Pay. Safety measures or goals are an important focus of SDG&E’s Variable Pay, as reflected in the performance goals included within the “Employee & Public Safety Operations” category of SDG&E’s 2023 Executive and non-executive

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<sup>23</sup> 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.”

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 SDG&E Board meets at least quarterly. 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 2023 Executive and non-executive ICPs reflects this value and priority. There are no guaranteed monetary incentives in SDG&E's Executive and non-executive ICPs. 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.”<sup>24</sup> SDG&E's 2023 Executive ICP and 2023 non-executive ICP each

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<sup>24</sup> D.19-04-020, Ordering Paragraph 6.C. at 63.

include twelve separate safety-related performance measures.<sup>25</sup> 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 twelve 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. Safety-related performance metrics are 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

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<sup>25</sup> For the period of January 1, 2023 to December 31, 2023, SDG&E had in place a “2023 Executive Incentive Compensation Plan” and a “2023 Incentive Compensation Plan.” The S-MAP Phase Two Decision defines “executive” as “director or above.” SDG&E directors are covered by SDG&E’s 2023 Incentive Compensation Plan (*i.e.*, the 2023 non-executive Incentive Compensation Plan). Therefore, SDG&E refers to both the 2023 Executive Incentive Compensation Plan and the 2023 Incentive Compensation Plan” herein.



management activities over future GRC cycles.<sup>26</sup> As described in SDG&E's TY 2024 GRC testimony,<sup>27</sup> 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 tool 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-

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

<sup>27</sup> A.22-05-015/-016 (cons.), Ex. SDG&E-31-R (Deremer Revised Direct) at KJD-20.

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 and 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.
- 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 meet the goals for managing and minimizing the risks identified in the utility’s RAMP and GRC submissions.<sup>28</sup> D.19-04-020 found that it was “premature to approve specific RMAR requirements or to require separate, more general RMARs at this time,”<sup>29</sup> and instead adopted interim 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.”<sup>30</sup>

SDG&E filed its TY 2019 GRC Application on October 6, 2017.<sup>31</sup> Among other things, SDG&E’s GRC Application included requests related to mitigating their key safety risks and

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<sup>28</sup> D.14-12-025 at 3.

<sup>29</sup> D.19-04-020 at 32.

<sup>30</sup> *Id.*

<sup>31</sup> 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).<sup>32</sup> SDG&E’s 2016 RAMP filing significantly informed the TY 2019 General Rate Case results.<sup>33</sup> 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.”<sup>34</sup> 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 2023 figures reflect a transitional time period in presenting the above-noted Commission directives.<sup>35</sup>

The TY 2019 GRC Decision was approved by the Commission on September 26, 2019.<sup>36</sup> The TY 2019 GRC Decision states “[t]he adopted revenue requirement and PTY increases for

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<sup>32</sup> I.16-10-015/016 (cons.), Risk Assessment and Mitigation Phase Report of San Diego Gas & Electric Company and Southern California Gas Company (November 30, 2016).

<sup>33</sup> Similarly, pursuant to D.20-01-002, Appendix B at B-1, SDG&E filed its 2021 RAMP application on May 17, 2021, informing its TY 2024 GRC, which was filed on May 16, 2022.

<sup>34</sup> D.19-09-051 at 22.

<sup>35</sup> A Decision in the TY 2024 GRC is anticipated in 2024. Safety Performance Metrics Reports filed after the 2024 GRC Decision will reflect SDG&E’s total estimated risk mitigation spending as presented in the approved TY 2024 GRC and applicable RAMP filings.

<sup>36</sup> 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.”<sup>37</sup> Further, while SDG&E endeavored to “isolate the RAMP activity, to allow the reader to see the dollar request in GRC workpapers,”<sup>38</sup> 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.”<sup>39</sup>

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.”<sup>40</sup> SDG&E includes this data in the tables below. Some costs mitigate multiple identified RAMP risks and the tables below present costs related to risk mitigation activities based upon how costs were accounted for which may not be in alignment with their GRC presentation.<sup>41</sup> Please refer to SDG&E’s 2023 RSAR for comprehensive detail on spending activities presented in SDG&E’s 2016 RAMP Report and TY 2019 GRC proceeding.<sup>42</sup>

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<sup>37</sup> *Id.* at 3.

<sup>38</sup> A.17-10-007/-008 (cons.), Ex. SCG-02-R/SDG&E-02-R (York Direct) at JKY-6.

<sup>39</sup> D.19-09-051 at 22.

<sup>40</sup> D.19-04-020 at 32.

<sup>41</sup> *See supra* at 30-31. For this reason, Tables 2 and 3 of this 2023 SPMR should be read in conjunction with SDG&E’s 2023 Risk Spending Accountability Report, which will be filed on April 30, 2024.

<sup>42</sup> 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 2023 RSAR are preliminary and may change as the costs are finalized in the 2023 RSAR.

*Table 2 - SDG&E Total Risk Mitigation Spending: O&M*

<b>SDG&amp;E O&amp;M Details (2023 Direct \$000)</b>					
<b>RAMP Chapter</b>	<b>RAMP Risk Description</b>	<b>2023 Actuals</b>	<b>2023 Imputed Authorized</b>	<b>\$ Variance</b>	<b>% Variance</b>
<b>SDG&amp;E-01</b>	Wildfires Caused by SDG&E Equipment (Including Third Party Pole Attachments)	87,949	43,800	44,149	101%
<b>SDG&amp;E-02</b>	Catastrophic Damage Involving Third Party Dig-Ins	8,014	4,965	3,050	61%
<b>SDG&amp;E-03</b>	Employee, Contractor, and Public Safety	77,860	55,749	22,111	40%
<b>SDG&amp;E-04</b>	Distributed Energy Resources – Safety and Operational Concerns	100	88	12	14%
<b>SDG&amp;E-06</b>	Fail to Blackstart	36	48	(12)	-25%
<b>SDG&amp;E-07</b>	Cyber Security	14,886	9,013	5,872	65%
<b>SDG&amp;E-08</b>	Aviation Incident	521	483	39	8%
<b>SDG&amp;E-09</b>	Workplace Violence	4,779	5,600	(821)	-15%
<b>SDG&amp;E-10</b>	Catastrophic Damage Involving High-Pressure Gas Pipeline Failure	30,416	6,084	24,332	400%
<b>SDG&amp;E-11</b>	Unmanned Aircraft System Incident	1,170	191	980	514%
<b>SDG&amp;E-12</b>	Electric Infrastructure Integrity	8,166	23,383	(15,218)	-65%
<b>SDG&amp;E-13</b>	Records Management	7,231	10,079	(2,847)	-28%
<b>SDG&amp;E-14</b>	Climate Change Adaptation	-	474	(474)	-100%
<b>SDG&amp;E-16</b>	Catastrophic Damage Involving Medium-Pressure Gas Pipeline Failure	11,243	17,551	(6,308)	-36%
<b>SDG&amp;E-17</b>	Workforce Planning	3,346	2,577	770	30%
<b>New</b>	Emergent RAMP <sup>43</sup>	101,880	-	101,880	100%
	<b>Total SDG&amp;E RAMP</b>	<b>357,597</b>	<b>180,083</b>	<b>177,514</b>	<b>99%</b>

<sup>43</sup> 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.

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).<sup>44</sup> 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.”<sup>45</sup> Reprioritizing spending allows utilities to “[r]espond to immediate or short-term crises outside of the RAMP and GRC process,”<sup>46</sup> 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.”<sup>47</sup> 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 Total Risk Mitigation Spending: Capital**

SDG&E Capital Details (2023 Direct \$000)					
RAMP Chapter	RAMP Risk Description	2023 Actuals	2023 Imputed Authorized	\$ Variance	% Variance
SDG&E-01	Wildfires Caused by SDG&E Equipment (Including Third Party Pole Attachments)	117,719	97,394	20,325	21%
SDG&E-02	Catastrophic Damage Involving Third Party Dig-Ins	6	329	(323)	-98%
SDG&E-03	Employee, Contractor, and Public Safety	17,828	13,890	3,938	28%

<sup>44</sup> 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.

<sup>45</sup> D.20-01-002 at 38.

<sup>46</sup> D.18-04-016 at 6 (citing D.16-08-018 at 152).

<sup>47</sup> D.16-08-018 at 152.

<b>SDG&amp;E Capital Details (2023 Direct \$000)</b>					
<b>RAMP Chapter</b>	<b>RAMP Risk Description</b>	<b>2023 Actuals</b>	<b>2023 Imputed Authorized</b>	<b>\$ Variance</b>	<b>% Variance</b>
<b>SDG&amp;E-04</b>	Distributed Energy Resources – Safety and Operational Concerns	724	254	470	185%
<b>SDG&amp;E-05</b>	Major Disturbance to Electrical Service (e.g., Blackout)		1,819	(1,819)	-100%
<b>SDG&amp;E-06</b>	Fail to Blackstart	-	2,156	(2,156)	-100%
<b>SDG&amp;E-07</b>	Cybersecurity	4,661	3,380	1,281	38%
<b>SDG&amp;E-08</b>	Aviation Incident	-	2,073	(2,073)	-100%
<b>SDG&amp;E-09</b>	Workplace Violence	963	4,390	(3,428)	-78%
<b>SDG&amp;E-10</b>	Catastrophic Damage Involving High-Pressure Gas Pipeline Failure	36,419	10,962	25,457	232%
<b>SDG&amp;E-12</b>	Electric Infrastructure Integrity	95,297	115,617	(20,320)	-18%
<b>SDG&amp;E-13</b>	Records Management	14,604	13,288	1,316	10%
<b>SDG&amp;E-16</b>	Catastrophic Damage Involving Medium-Pressure Gas Pipeline Failure	121,211	46,946	74,265	158%
<b>New</b>	Emergent RAMP <sup>48</sup>	422,510	17,238	405,272	2351%
	<b>Total SDG&amp;E RAMP</b>	<b>831,942</b>	<b>329,736</b>	<b>502,206</b>	<b>152%</b>

As stated above, please refer to SDG&E’s 2023 Risk Spending Accountability Report for comprehensive 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.<sup>49</sup>

<sup>48</sup> 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.

<sup>49</sup> Per D.22-10-002, the IOU RSAR filing date was extended to April 30. As a result, the authorized and recorded Capital spending activities for SDG&E’s 2023 RSAR are preliminary and may change as the costs are finalized in the 2023 RSAR.



## 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.<sup>50</sup> 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 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.

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

**Metric Name and Description per D.21-11-009:**<sup>51</sup> “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.

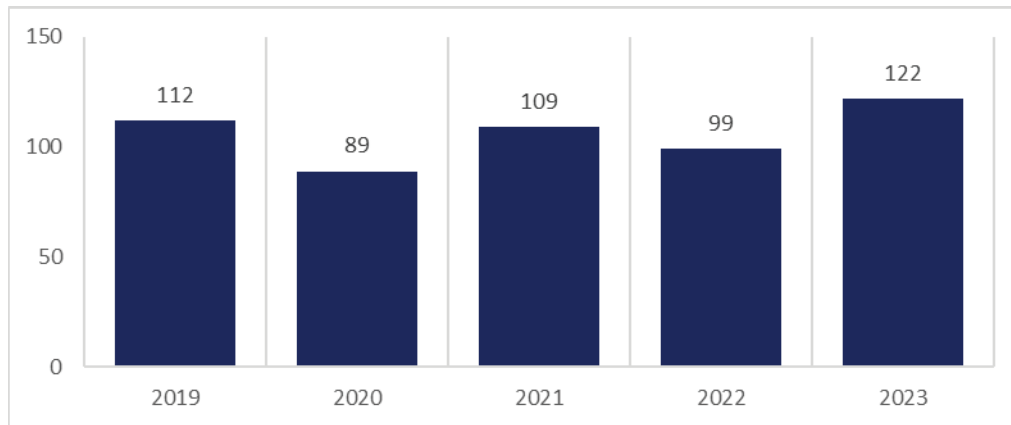
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<sup>50</sup> As discussed *supra* at 1, SDG&E was directed in the Risk OIR Phase One Decision to adhere to the S-MAP Phase Two Decision to the extent the metrics promulgated by that Decision were not revised, superseded, or expanded by the directives contained in the Risk OIR Phase One Decision.

<sup>51</sup> The metric name and description, risks, category, and units for each metric comes directly from D.21-11-009, Appendix B.

**Summary:**

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



**Metric Background:**

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).

**Metric Performance:**

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.<sup>52</sup> In 2023, SDG&E did not experience any Transmission-related wire-down events, compared to 10 Transmission-related events in 2022. However, in Q1 2023, SDG&E experienced a greater number of primary wire-down events compared to 2022; this increase is primarily attributed to the impactful storms that occurred in the region.

In addition, during a review of the 2023 data, it was noted that certain instances of wire down events were double counted in the data for this metric in 2021 and 2022. The above chart and the historical data presented in Attachment B have been revised to reflect the amended data.

**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 2023 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 2023 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 is tracked by the project managers of the above-listed programs and verified on the quarterly geographic information system (GIS) reports.

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<sup>52</sup> Per D.21-11-009, Appendix B, n.1, “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>).”

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 2023 report submission, SDG&E references the incentive compensation plans in place during 2023.

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

- Yes. As described above, SDG&E’s 2023 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 57% overall safety weighting for SDG&E’s 2023 Executive ICP and 3% of the 34% overall safety weighting for SDG&E’s 2023 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 2023 Executive ICP or 2023 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.”

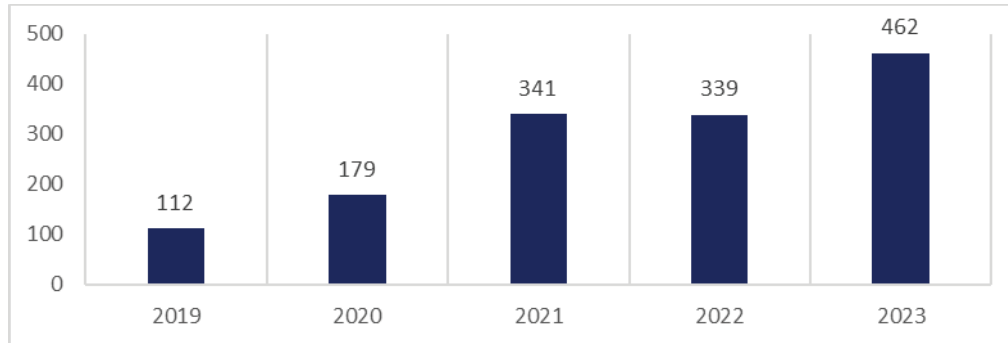
**Risks:** Wildfire; Transmission Overhead Conductor; Distribution Overhead Conductor Primary.

**Category:** Electric.

**Units:** Number of wires down events.

**Summary:**

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



**Metric Background:**

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.

**Metric Performance:**

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 2023, SDG&E did not experience any days classified as MED and had zero instances of Transmission wires down, compared to 10 Transmission-related events in 2022. However, in Q1 2023, SDG&E

experienced a greater number of primary and secondary wire-down events compared to Q1 2022; this increase is primarily attributed to the impactful storms that occurred in the region.

There are several programs to proactively replace high-risk overhead conductors to mitigate against wire down events. The Covered Conductor (CC) and Strategic Underground (SUG) programs include activities to reduce the likelihood of risk events from occurring in areas such as those located in the High Fire Threat District (HFTD) Tiers 2 and 3. Additionally, the Overhead Public Safety (OPS) program replaces remaining small wire conductors that are in proximity to the public (e.g., near schools, freeways, and high profile areas) to mitigate risk associated with a wire down event.

In addition, during a review of the 2023 data, it was noted that certain instances of wire down events were double counted in the data for this metric in 2022. The above chart and the historical data presented in Attachment B have been revised to reflect the amended data.

**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 2023 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 2023 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 is 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 2023 report submission, SDG&E references the incentive compensation plans in place during 2023.

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

- Yes. As described above, SDG&E’s 2023 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 57% safety weighting for SDG&E’s 2023 Executive ICP and 3% of the 34% safety weighting for SDG&E’s 2023 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 2023 Executive ICP or 2023 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, Section 123.2(c) as supplemental information, not as a metric.”

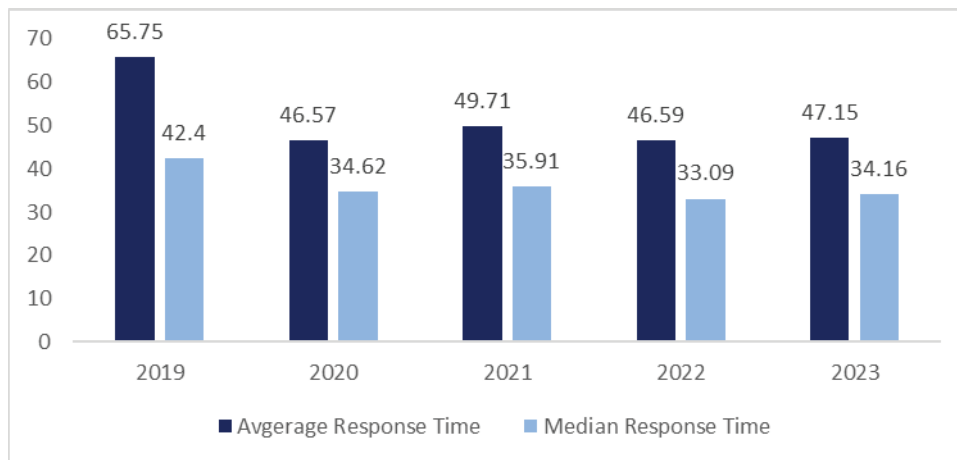
**Risks:** Wildfire; Overhead Conductor; Public Safety; Worker Safety.

**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)*



## Metric Background:

The Electric Emergency Response 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 on-site arrival 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.

## Metric Performance:

SDG&E’s response time for electric emergency notifications in 2023 remained largely unchanged from prior Safety Performance Metric Reports even with the challenges brought by several impactful weather events. The first quarter of 2023 experienced a significant number of rainstorm events resulting in large volumes of requests to respond to electrical emergencies, with



some events lasting for multiple days. In addition, in mid-August of 2023, San Diego and the greater Southern California region received the first-ever tropical storm warning from the remnants of Hurricane Hilary. As the storm entered San Diego County, SDG&E responded to 80 separate emergency requests in a three-day period during this impactful weather event. Ten years of monthly historical data is included 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

**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.”

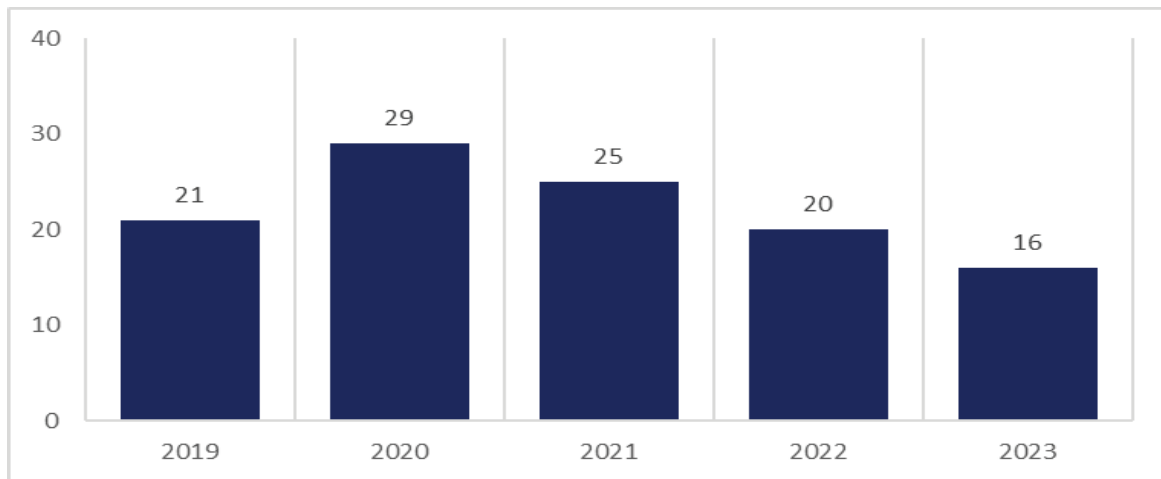
**Risks:** Overhead Conductor; Wildfire; Public Safety; Worker Safety; Catastrophic Event Preparedness.

**Category:** Electric.

**Units:** Number of ignitions.

**Summary:**

*Summary Chart of Fire Ignitions Metric Data (Annual)*



**Metric Background:**

SDG&E operates its system with safety as a core value. When operating conditions reach a Fire Potential Index (FPI) of elevated or extreme levels, SDG&E implements operating protocols that reduce the risk of ignitions caused by the system. These protocols can include disabling automatic re-closers, enabling enhanced protection settings, work restrictions, and in the most extreme cases, de-energizing the system in specific areas that experience extreme risk.

Additionally, SDG&E has created a Wildfire Prevention Electric Standard Practice, which requires field employees and contractors working on SDG&E projects to take an annual training course that focuses on fire prevention practices 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 as a result of work activities and the operation of the electric system. Mitigations also strive to reduce the

consequences of an ignition, should one occur. SDG&E utilizes data gathered by fire response agencies and utility metrics to identify increased areas of risk and inform mitigation activities.

SDG&E is committed to reducing the risk of wildfire ignitions caused by the electric system. In 2019, SDG&E established a pilot Ignition Management Program (IMP). This program tracks ignitions and potential ignitions in order to ascertain any patterns or correlations. These events are documented and analyzed. Through 2023, the IMP has tracked and analyzed 859 evidence of heat reports. 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 IMP has also incorporated a process for completing 4-hour notifications and one business day reports to California Office of Energy Infrastructure Safety (OEIS) in compliance with California Code of Regulations, Title 14 Section 29300.

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 include contact events ranging from outside/vehicle contact, foil balloons and flying patio umbrellas. For example, since 2014 there have been thirty-five (35) 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 available fuels near an ignition point. There were a total of 16 reportable ignitions in 2023, with the total combined acreage of 20 acres for all reportable ignitions. These 16 ignitions are the lowest total number of CPUC reportable fires since the 2014 definition of a reportable fire was adopted.

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), and the Cleveland National Forest Project (CNF), using risk analytics and visualization tools such as WiNGS (Wildfire Next Generation System), and current programs such as Covered Conductor Hardening and Strategic Undergrounding. System hardening efforts have expanded to include the replacement of hotline clamps, expulsion fuses, lightning arresters, 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.<sup>53</sup> 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,

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<sup>53</sup> D.14-02-015, Ordering Paragraphs 8 and 9 at 99, and Appendix C.

- The resulting fire traveled greater than one linear meter from the ignition point, and
- The utility has knowledge that the fire occurred.

Since external reporting of this metric began in 2014,<sup>54</sup> SDG&E has had only four reportable fires over 10 acres. All other CPUC-reportable fires have been less than 10 acres. External factors such as vehicles contacting electric equipment, foil balloons, and human activity continue to have a large impact on the yearly number of reportable fires.

**Metric Performance:**

Monthly historical data is provided in the accompanying Excel file (Attachment B) for years 2014 through 2023, 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.”<sup>55</sup> 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.

**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 2023 Executive and 2023 non-executive ICP plans include the following “Fire and Public Safety” performance measure aimed at reducing the risk of fire ignitions:
  - 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,

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<sup>54</sup> *Id.*

<sup>55</sup> D.19-04-020, Attachment 1 at 1.

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 2023 report submission, SDG&E references the incentive compensation plans in place during 2023.

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

- Yes. As described above, SDG&E's 2023 Executive Incentive Compensation and 2023 non-executive Incentive Compensation Plans include a safety metric for Wildfire & PSPS System Hardening. This metric is weighted 5% of the 57% safety weighting for SDG&E's 2023 Executive ICP and 3% of the 34% safety weighting for SDG&E's 2023 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 2023 Executive ICP or 2023 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) tickets. 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."

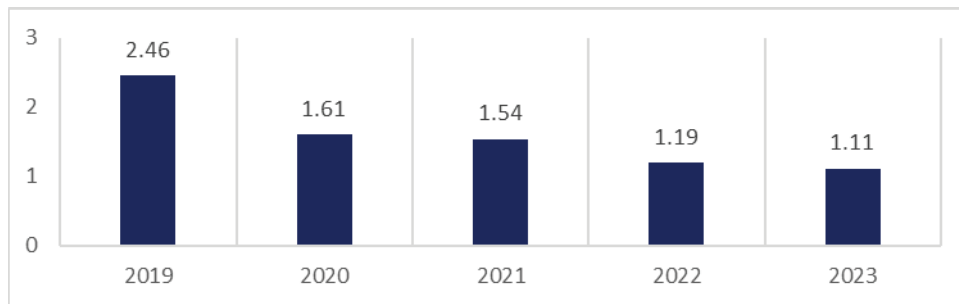
**Risks:** (1) Transmission Pipeline Failure - Rupture with Ignition, (2) Distribution Pipeline Rupture with Ignition (non-Cross Bore). (3) Catastrophic Damage involving Gas Infrastructure (Dig-Ins).

**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)*



## Metric Background:

SDG&E began tracking this metric in 2014, however, regulations were not enacted requiring external reporting of this data until 2017.<sup>56</sup> Over the time period SDG&E has been tracking this metric, SDG&E has seen an increased volume of USA tickets. Third-party gas dig-ins are an identified RAMP risk for SDG&E.

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 America Petroleum Institute 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.

## Metric Performance:

In 2023, SDG&E managed 203,026 811 USA tickets and reported 226 underground gas excavation damages. Analysis of reported damage incidents for 2023 shows that nearly 60% were due to a lack of notification to 811 USA for a locate and mark ticket. Another approximately 40%

<sup>56</sup> 49 CFR § 192, *et al.*; *id.* at §196; California Government Code § 4216.2(b), GO 112-F; and American Petroleum Institute Recommended Practice (API RP) 1162, (3rd Edition, February 2023).

were due to insufficient excavation practices even after the excavator called 811 USA and underground facilities were marked.

Monthly data is provided for years 2014 through 2023 in the accompanying Excel file (Attachment B) for the number of third-party gas dig-ins per 1,000 USA tickets.

**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 2023 Executive Incentive Compensation and 2023 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 2023 report submission, SDG&E references the incentive compensation plans in place as of 2023.

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

- Yes. As described above, SDG&E’s 2023 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 57% safety weighting for SDG&E’s 2023 Executive ICP and 3% of the 34% safety weighting for SDG&E’s 2023 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 2023 Executive ICP or 2023 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)*

	2019	2020	2021	2022	2023
Miles Inspected	50	62	115	1	114
Percent Inspected	11%	14%	20%	0%	14%

**Metric Background:**

SDG&E’s Transmission Integrity Management Program (TIMP) is federally mandated to continually identify threats to transmission pipelines in High Consequence Areas (HCAs) or areas outside of HCAs (covered non-HCAs) as required by federal regulations,<sup>57</sup> determine the risk posed by these threats, schedule and track assessments to address threats within prescribed timelines, 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, and report findings to regulators.

Approximately 182 miles out of 218 miles of SDG&E’s transmission pipelines are located in HCA areas. In-Line Inspection (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

<sup>57</sup> 49 CFR § 192, Subpart O and § 192.710.

covered 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, 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, 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 the American Society of Mechanical Engineers (ASME) Gas Transmission and Distribution Piping Systems 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 schedules, findings from assessments and interval of reassessments. TIMP reduces the risk of failure to the pipeline transmission system, and, on a continual basis, SDG&E evaluates and enhances the program.

One recent enhancement to SDG&E's program, in response to new regulatory requirements which are driving the need for enhanced pipeline threat evaluations and inspection efforts, is the use of newer technology (*i.e.*, Electromagnetic Acoustic Transducer [EMAT]) as a complementary inspection tool to traditional ILI tools (*e.g.*, Magnetic Flux Leakage [MFL]). Running the additional EMAT tool during inspections will increase data collected on the condition of pipeline segments to enhance risk analysis; its use will also increase the total mileage that is reported for this metric.

SDG&E provides annual data for years 2014 through 2023 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 Pipeline and Hazardous Materials Safety Administration (PHMSA) Gas Transmission and Gathering Annual Report F 7100.2-1.<sup>58</sup> 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 does not include duplicate miles. Due to the different methods of calculating the number of miles and the percentage of miles, the data points will not necessarily correlate. As previously indicated, the number of assessments and mitigation activities planned under TIMP and to comply with 49 CFR § 192.710 and Subpart O varies from year to year; therefore, data should not be compared on a year-by-year basis.

**Metric Performance:**

In 2023, SDG&E completed the assessment of multiple transmission lines, including a major line spanning a considerable distance. Multiple inline inspection technologies were utilized to

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<sup>58</sup> 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>.

assess the combination of various threats on this pipeline. As a result, there was a significant increase in both the inspection miles and the percentage of pipelines inspected, as compared to the previous year.

**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

#### **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.”

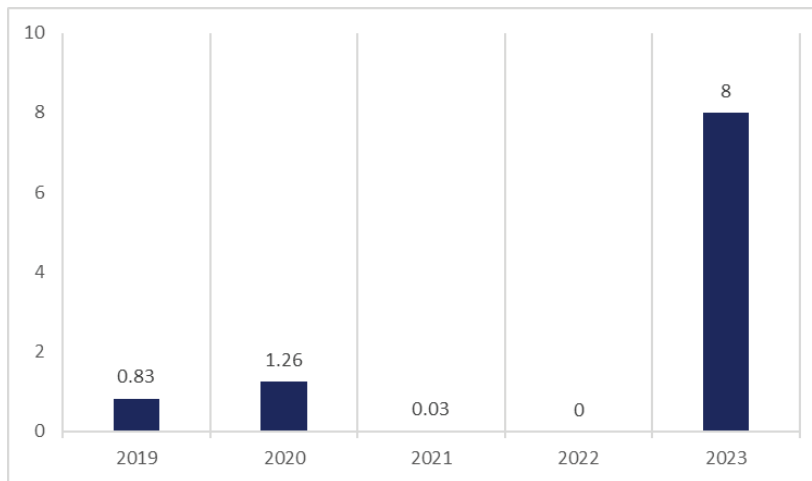
**Risks:** Catastrophic Damage Involving High-Pressure Pipeline Failure.

**Category:** Gas.

**Units:** Miles.

**Summary:**

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



**Metric Background:**

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 action, where possible, to address potential threats and integrity concerns before pipeline incidents occur. SDG&E has focused on assessing pipelines using ILI; approximately 71% of transmission pipelines operating in HCAs and approximately 72% of the entire transmission system are able to accommodate ILI tools as of the end of year 2023 (refer to Metric 13).

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, which is primarily driven by threat and risk analyses that then result in the determination that ILI is the most appropriate assessment method.

SDG&E is providing annual data for the years 2014 through 2023 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 PHMSA Gas Transmission and Gathering Annual Report F 7100.2-1.<sup>59</sup>

**Metric Performance:**

SDG&E continues to evaluate opportunities to retrofit the transmission system for inline inspection. In 2023, SDG&E upgraded 8 miles of pipeline to allow for first-time inline inspections and more effectively assess active threats.

**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

**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, Section 123.2(c) as supplemental information, not as a metric.”

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<sup>59</sup> *Id.*

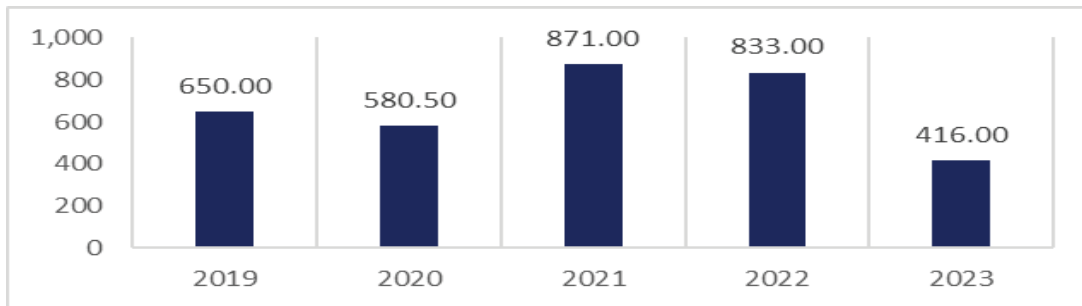
**Risks:** Distribution Pipeline Rupture with Ignition (non-Cross Bore).

**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)*



**Metric Background:**

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. 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 § 192.723A 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.

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 (*e.g.*, by shutting-off gas supply, eliminating subsurface leak migration, repair) per SDG&E's standards.

**Metric Performance:**

SDG&E began tracking this data in 2017 when GO 112-F went into effect. Monthly historical data for years 2017 through 2023 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. 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.

The reduction in the 'shut-in' time in 2023 for gas mains is primarily attributed to continuous improvement efforts. In 2023, SDG&E conducted structured reviews of the actions taken in response to incidents involving an unplanned/uncontrolled release of gas and Code 1 leaks discovered during routine monitoring and inspection activities. These learning-focused discussions helped to understand what took place during emergency responses, analyze the actions taken, and identify areas for continuous improvement.

**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, Section 123.2(c) as supplemental information, not as a metric.”

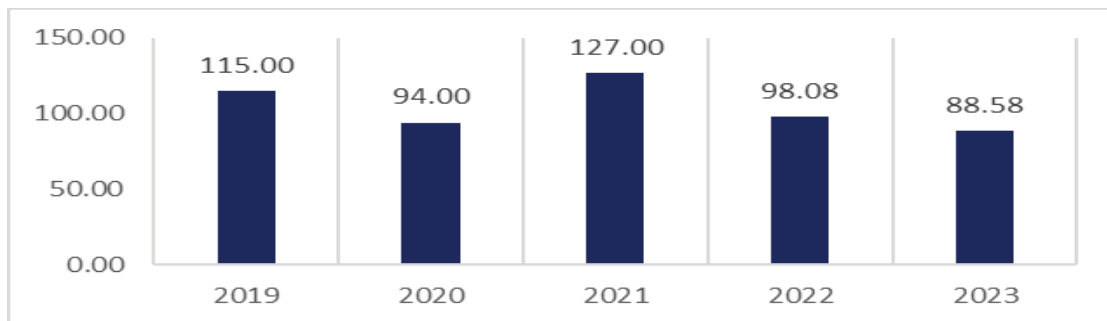
**Risks:** Distribution Pipeline Rupture with Ignition (non-Cross Bore).

**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)*



**Metric Background:**

Similar to Metric 8, 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. 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. 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.

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 (*e.g.*, by shutting-off gas supply, eliminating subsurface leak migration, repair) per SDG&E's standards.

**Metric Performance:**

SDG&E began tracking this metric in 2017. This data is also reported externally per GO 112-F. The accompanying Excel file (Attachment B) provides monthly historical data for 2017 through 2023 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. SDG&E will continue to track this metric for inclusion in future annual reports until a full ten years of historical data is provided.

The reduction in the ‘shut-in’ time in 2023 for gas services is primarily attributed to continuous improvement efforts in this space. In 2023, SDG&E conducted structured reviews of the actions taken in response to incidents involving an unplanned and uncontrolled release of gas and Code 1 leaks discovered during routine monitoring and inspection activities. These learning-focused discussions helped to understand what took place during emergency responses, analyze the actions taken, and identify areas for continuous improvement.

**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:**

*Summary Table of Cross Bore Intrusions Metric Data (Annual)*

2019	2020	2021	2022	2023
0	0	0	0	0

**Metric Background:**

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.

**Metric Performance:**

As stated above, SDG&E’s sewer lateral inspections were completed in 2012. SDG&E includes monthly data for 2014-2023 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, Section 123.2(c) as supplemental information, not as a metric.”

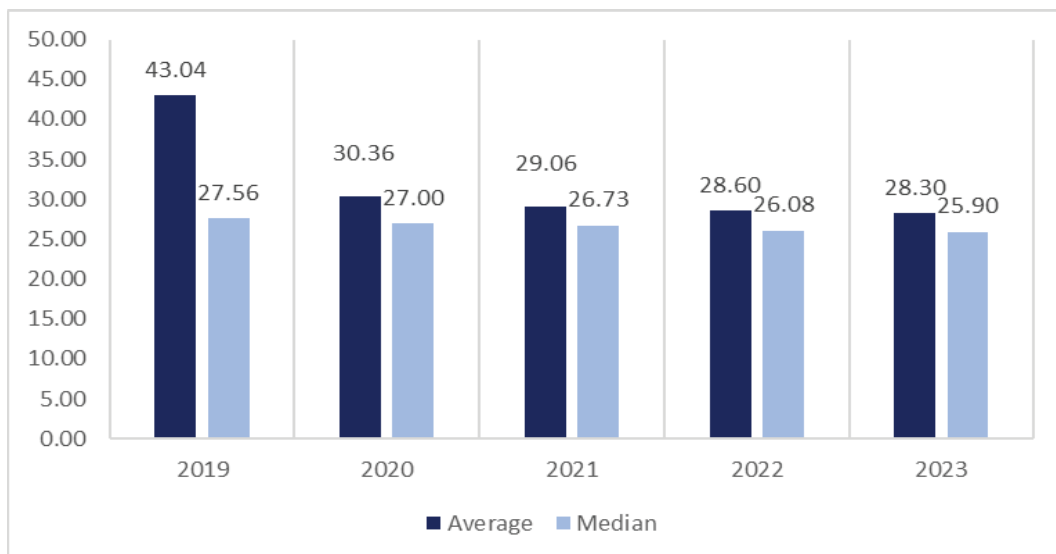
**Risks:** Distribution Pipeline Rupture with Ignition.

**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)**



**Metric Background:**

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 Customer Service Field employees are trained to rectify safety hazards on customer premises.

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. The average time it takes for SDG&E to respond to Priority 1 (P1) gas emergencies is calculated by dividing total time in minutes by total orders for the current year. The median time is calculated as the value lying at the midpoint of recorded times. Total time in minutes commences at the time of notification to SDG&E through the time SDG&E technicians arrive onsite. Adjustments made due to timekeeping issues (*e.g.*, when the tech has connectivity issues while onsite), and calls determined to be related to area odors are excluded from the metric calculation.

**Metric Performance:**

The monthly historical data for October 2017 through December 2023, 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 GO 112-F reporting requirements became effective. 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, which has also improved dispatch time. 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.

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 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 2023 Executive Incentive Compensation Plan and 2023 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 2023 report submission, SDG&E references the incentive compensation plans in place during 2023.

**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 2023 Executive and non-executive ICPs. This specific performance measure is weighted at 5% of the overall 57% public and employee safety operations measures of the 2023 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 2023 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 2023 Executive ICP or 2023 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)*

	2019	2020	2021	2022	2023
Miles	142	142	147	147	157
Percentage	64%	65%	68%	69%	72%

**Metric Background:**

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 particular areas outside of HCAs (covered non-HCAs),<sup>60</sup> determine the risk posed by these threats, schedule prescribed assessments to evaluate these threats, collect information about the condition of the pipelines, and

<sup>60</sup> 49 CFR § 192, Subpart O and § 192.710.



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.

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. The data for this metric is compiled by identifying the number of miles of the SDG&E transmission system that have been internally inspected in the past. Annual data is included in the accompanying Excel file (Attachment B) for 2014 through 2023.

As stated above for Metric No. 7, SDG&E has focused on assessing pipelines using ILI. As of year-end 2023, approximately 72% of SDG&E’s transmission system has been confirmed to be able to accommodate ILI tools and SDG&E continues to evaluate ILI retrofit opportunities through the TIMP threat and risk analysis process.

**Metric Performance:**

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.<sup>61</sup> These two annual metrics are utilized to calculate the percentage for this metric. This metric has remained relatively constant since 2017 at 61%-72% because not all transmission pipelines can accommodate ILI tools and, depending on the threats and risks associated with pipeline segments, not all transmission pipelines need to be assessed by ILI tools. Retrofitting may take place depending on the factors discussed under Metric

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<sup>61</sup> 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>.

No. 7 and would increase the percentage of piggable mileage. For example, if threat and risk analysis results necessitate the use of ILI, SDG&E will retrofit a pipeline segment. However, if ILI is not necessary, the remaining percentage that cannot accommodate ILI tools may be assessed with other methods as appropriate. SDG&E's significant increase in total piggable miles in 2023 reflects the Company's commitment to enhancing integrity assessments and the safety of its gas system through the use of inline inspections.

**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.”

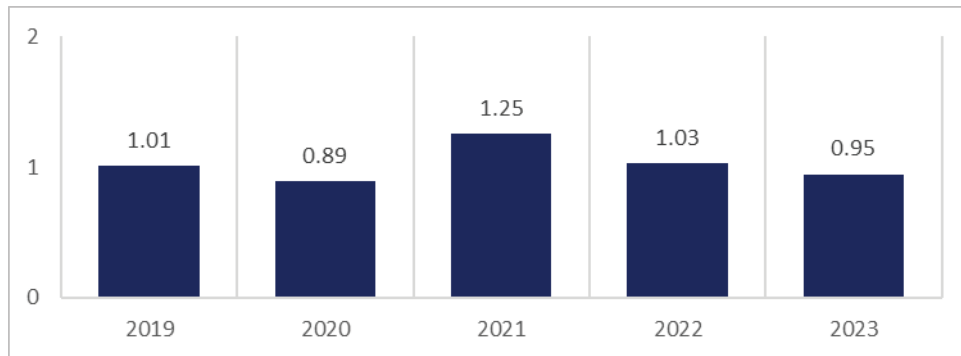
**Risks:** Employee Safety.

**Category:** Injuries.

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

**Summary:**

*Summary Chart of Employee DART Rate Metric Data (Annual)*



**Metric Background:**

In 2023, SDG&E experienced an 8% decrease in its DART case rate compared with the value at year-end 2022. 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.

**Metric Performance:**

Ten years of monthly historical data are provided in the accompanying Excel file (Attachment B) for SDG&E’s Employee DART Rate. The 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. In 2023, SDG&E’s DART rate decreased compared with 2022, as a result of a decrease in DART cases and an increase in overall 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 2023 Executive Incentive Compensation Plan and 2023 non-executive Incentive Compensation Plan include the following metric:

Lost Time Incident (LTI) Rate<sup>62</sup> – 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

<sup>62</sup> DART cases are OSHA Recordable Injuries or Illnesses resulting in Days Away from Work, or Days On Restricted Duty or Job Transfer.

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 2023 report submission, SDG&E references the incentive compensation plans in place during 2023.

**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 2023 Executive and non-executive ICPs. This specific performance measure is weighted at 5% of the overall 57% public and employee safety operations measures in the 2023 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 2023 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 LTI Rate performance measure is linked to all SDG&E director or above positions covered by either the 2023 Executive ICP or 2023 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.”

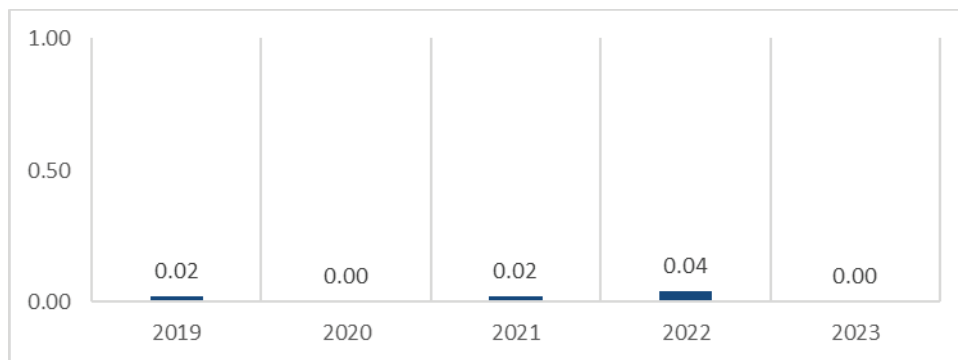
**Risks:** Employee Safety.

**Category:** Injuries.

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

**Summary:**

*Summary Chart of Rate of Serious Injuries or Fatalities (SIF) Actual (Employee) Metric Data (Year-end)*



**Metric Background:**

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), 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. SDG&E

continually evaluates initiatives for opportunities to further reduce the risk of serious employee injury.

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. The Cal/OSHA definition is the one used by California employers for mandatory reporting of work connected serious injuries to Cal/OSHA and is more conservative when compared with the classification methodology espoused in the EEI criteria for “serious injury.” SDG&E's use of the Cal/OSHA definition not only is consistent with the California reporting requirements, it also avoids the confusion that could occur were different criteria applied for different reporting objectives.

**Metric Performance:**

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 these data currently are reported to Cal/OSHA at the time of occurrence. For this metric, SDG&E uses the Cal/OSHA definition of "serious injury." SDG&E notes that EEI Safety Classification Model states specifically that “[C]reating a definition of serious injury and fatality (SIF) was outside the scope of this work. The [SCL] team deferred to the existing EEI SIF criteria and the basic definition that the event was life-threatening or life-altering... .”<sup>63</sup> SDG&E has determined that the Cal/OSHA criteria may exclude classification of an injury as "serious" that the EEI SIF criteria would allow, and vice versa. SDG&E also notes that a new definition of “Serious Injury”

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<sup>63</sup> Edison Electric Institute, *Safety Classification and Learning (SCL) Model* (Revised January 2023) at 11, available at <https://www.eei.org/-/media/Project/EEI/Documents/Issues-and-Policy/Power-to-Prevent-SIF/eeiSCLmodel.pdf?la=en&hash=4E03097C0292F52CB4FA186D0D8CE11876032836>.

went into effect in California on January 1, 2020, which may affect the number of reportable incidents in 2020 and beyond.<sup>64</sup>

**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 2023 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-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 that 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, the date of observation and notes on the observation. Note: Remote workers may receive virtual observation, 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 SDG&E 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

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<sup>64</sup> 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.” California Code of Regulations, Title 8, § 330(h); California Assembly Bill 1805, amended Labor Code, § 6302(h).

this 2023 report submission, SDG&E references the incentive compensation plans in place during 2023.

**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 2023 Executive and non-executive ICPs. These specific performance measures are each weighted 3% - 5% of the overall 57% public and employee safety operations measures in the 2023 Executive ICP which applies to all SDG&E executives covered by the plan and are weighted at 3% - 5% of the overall 34% of public and employee safety operations measures of the 2023 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 2023 Executive ICP or 2023 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:  $\text{Number of SIF-Actual cases among contractors} \times 200,000 / \text{contractor hours worked}$ , 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.

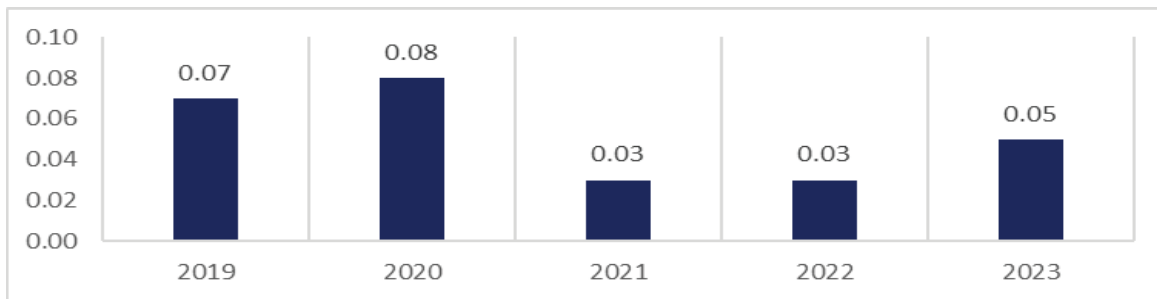
**Category:** Injuries.



**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)*



**Metric Background:**

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’s Class 1 Contractor Safety Manual includes 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 uses third-party administration tools to manage various aspects of its contractor safety program. ISNetwork (ISN) is an online contractor and supplier management platform of data-driven products and services that help manage risk through data collected across the contractors' operations nationally.<sup>65</sup> Each Class 1 Contractor currently performing or seeking to perform work for SDG&E must have an ISN account. Data collected within ISN provides SDG&E with data that aids in the determination of whether to use or continue to use Class 1 contractors for projects.

**Metric Performance:**

In 2018, SDG&E began tracking contractor SIF Actual events in ISN, and in 2022 transitioned from ISN to Smartsheet. The accompanying Excel file (Attachment B) provides monthly data for 2018 through 2023 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

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<sup>65</sup> ISNetwork, available at: <https://www.isnetwork.com/>.

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 it will utilize the Cal/OSHA definition to be consistent with the California reporting requirements and avoid the confusion that could occur were different criteria applied for different reporting objectives. 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. Potential SIF incidents are identified using the EEI Safety Classification and Learning Model. If a utility has implemented a replicable, substantially similar evaluation methodology for assessing SIF Potential, the utility may use that method for reporting this metric. If a utility opts to report the rate of SIF Potential using a method other than the EEI Safety Classification Model, it must explain how its methodology for counting SIF Potential differs and why it chose to use it. As a supplemental reporting requirement to the Potential SIF Rate (Employee), all utilities shall provide information about the key lessons learned from Potential SIF (Employee) incidents.”

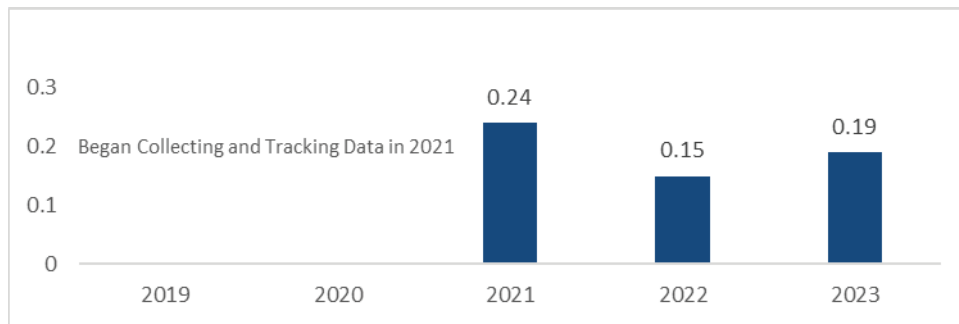
**Risks:** Employee Safety.

**Category:** Injuries.

**Units:** Number of SIF-Potential cases among employees times 200,000 divided by employee hours worked.

**Summary:**

*Summary Chart of Rate of SIF Potential (Employee) Metric Data (Annual)<sup>66</sup>*



**Metric Background:**

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.

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<sup>66</sup> 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.

**Metric Performance:**

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 2023 are provided in the accompanying Excel file (Attachment B) for SDG&E’s Employee SIF Potential rate. As footnoted above, the historical data for 2021, previously reported using an alternative model, has been restated to reflect the EEI Occupational Health and Safety Committee Safety and Classification Learning (SCL) Model.

A key lesson learned from the assessments conducted to date is that the EEI methodology provides a powerful tool for hazard recognition. Using its hierarchical framework of risk severity, scrutiny of SIF Potential events may reveal common factors in different organizations within the Company due to the greater variety of situations involved. SDG&E can learn from the insights gained from the assessments and share them across the Company to raise visibility of risks, conditions and issues, which can lead to stronger and more effective corrective actions.

**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.<sup>67</sup> If a utility has implemented a replicable, substantially similar evaluation methodology for assessing SIF Potential, the utility may use that method for reporting this metric. If a utility opts to report the rate of SIF Potential using a method other than the EEI Safety Classification Model, it must explain how its methodology for counting SIF Potential differs and why it chose to use it. As a supplemental reporting requirement to the Potential SIF Rate (Contractor), all utilities shall provide information about key lessons learned from SIF Potential (Contractor) incidents.

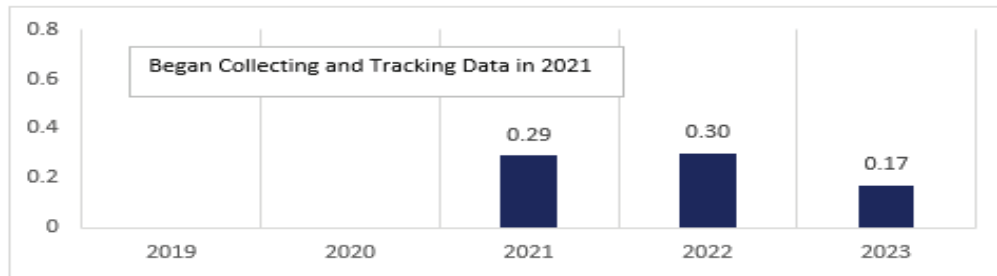
**Risks:** Contractor Safety.

**Category:** Injuries.

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

**Summary:**

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



**Metric Background:**

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.

<sup>67</sup> D.21-11-009, Appendix B at 8 (citation omitted). *See also* Edison Electric Institute, Safety Classification and Learning (SCL) Model (Revised January 2023), available at <https://www.eei.org/-/media/Project/EEI/Documents/Issues-and-Policy/Power-to-Prevent-SIF/eeiSCLmodel.pdf?la=en&hash=4E03097C0292F52CB4FA186D0D8CE11876032836>.

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 documented 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.

The Rate of SIF Potential applicable to Contractor activities metric was adopted by the Commission in D.21-11-009. Upon its adoption, SDG&E added SIF Potential events to the required reportable events Class 1 Contractors report. The current definition of a SIF Potential event for contractors is "A Work-Connected event where a flaw or weakness (in an action or tool) that if left uncorrected, could result in a serious injury or fatality." The definition SDG&E Contractor Safety uses was initiated in 2021 for all Class 1 Contractors prior to the decision by the CPUC to require reporting.

A key lesson learned from the assessments conducted to date is that the methodology provides a powerful tool for hazard recognition, affords a hierarchical understanding of risk severity, and reveals common high-risk factors within and across multiple organizations within the Company. Sharing results from these insights across the Company can lead to stronger and more effective corrective actions.

**Metric Performance:**

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 Contractor-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.

**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.

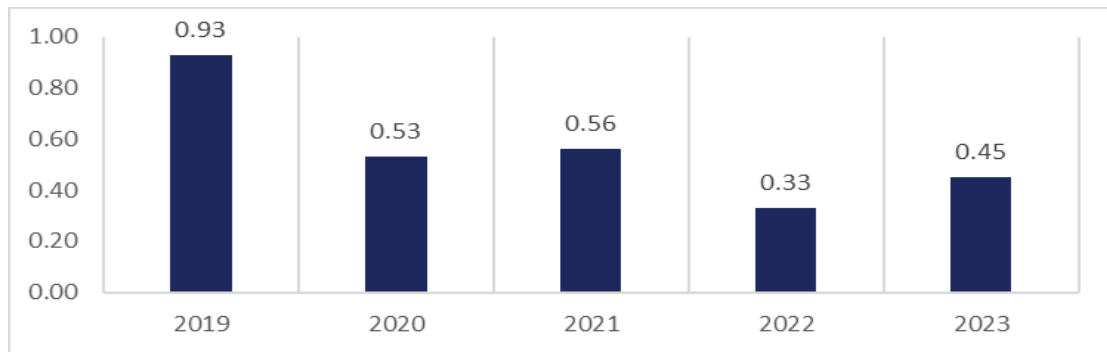
**Category:** Injuries.

**Units:** OSHA DART Rate.



**Summary:**

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



**Metric Background:**

All Class 1 Contractors are included in this metric. SDG&E uses a third-party administrator to house and verify the established SDG&E pre-qualification requirements for Class 1 Contractors. The third-party administrator 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.

The third-party administrator 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.

**Metric Performance:** 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:  $\text{DART Case Rate} = \frac{\text{Number of DART Cases}}{\text{productive hours worked}} \times 200,000$ . 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.”

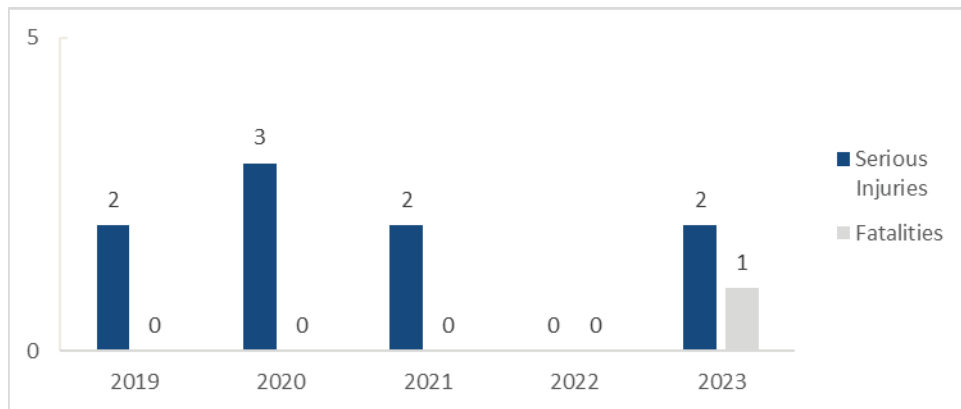
**Risks:** Public Safety.

**Category:** Injuries.

**Units:** Number of Serious Injuries and Fatalities.

**Summary:**

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



**Metric Background:**

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.

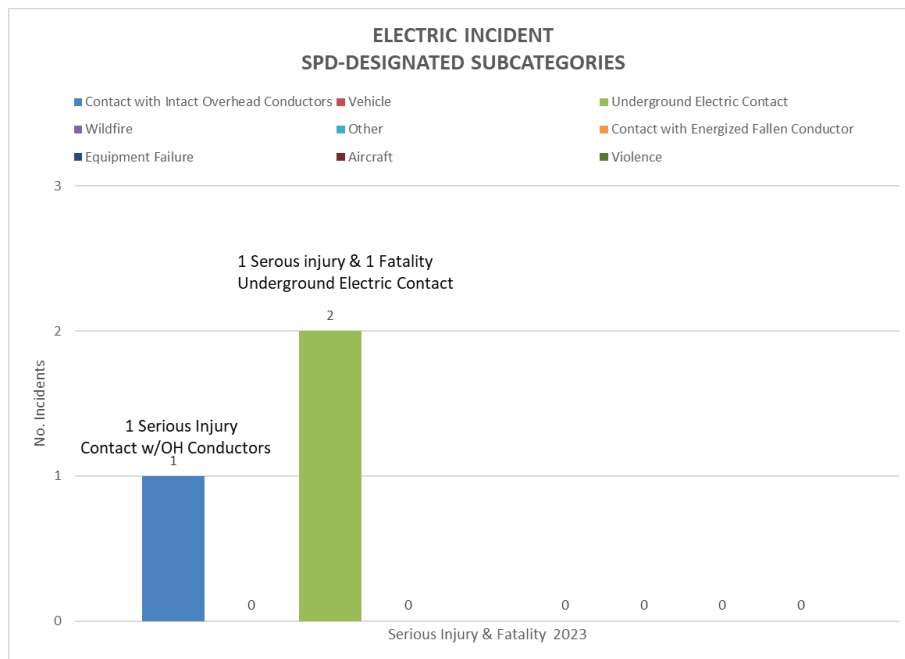
As stated in the metric description, this metric also includes utility vehicles used during business. To mitigate this risk, SDG&E utilizes the Smith System® Defensive Driving System as part of safe driving training for employees. The Smith System® was founded on the principle that most vehicle crashes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

**Metric Performance:**

SDG&E's internal database captures historical data beginning in 2015. The accompanying Excel file (Attachment B) includes monthly data for years 2015 through 2023 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,<sup>68</sup> 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.”<sup>69</sup> Pursuant to D.19-04-020, on January 28, 2024, SDG&E submitted a draft of its Public-SIF data to the Commission’s Staff. On March 1, 2024, SPD informed the IOUs<sup>70</sup> 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,<sup>71</sup> SDG&E’s 2023 Pub-SIF data can be categorized as follows, as further represented in the charts below:

*2023 Charts of Public Serious Injuries and Fatalities Subcategories*

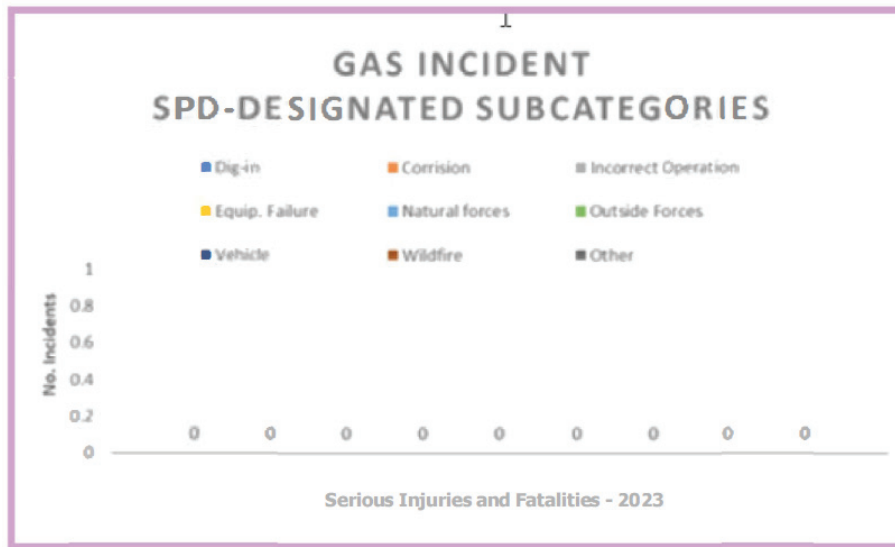


<sup>68</sup> In D.19-04-020, the Public Serious Injuries and Fatalities metric was contained in Metric 22. The modifications contained in D.21-11-009 changed the number of this metric to Metric 20. See D.21-11-009, Appendix F at 15.

<sup>69</sup> D.19-04-020 at 26, n.49.

<sup>70</sup> March 1, 2024, e-mail from John Deng, SPD staff, to SDG&E representative.

<sup>71</sup> SPD designated nine gas incident-related subcategories and nine electric incident-related subcategories, as reflected in the charts accompanying this Metric.



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

- Yes. 57% of SDG&E’s 2023 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 2023 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 2023 report submission, SDG&E references the incentive compensation plans in place during 2023.

**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 2023 Executive Incentive Compensation Plan comprise 23 percent of the overall 57% public and employee safety operations weighting and 14% of the overall 34% weighting of SDG&E’s 2023 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 2023 Executive ICP or 2023 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.<sup>72</sup>

**Summary:**

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

Year	2019	2020	2021	2022	2023
Reportable Incidents	0	0	0	1	0

**Metric Background:**

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 in support of electric transmission, electric distribution, and gas operations with

<sup>72</sup> 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.

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 a self-air-rescue capability for personnel working on or adjacent to electrical infrastructure and areas that are accessible by helicopter only. 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 continuing the same level of highly professional services, characteristic of manned operations, with its unmanned flight operations. ASD'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 within the SDG&E service territory. 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 supports 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 at mitigating the risk created by increased numbers of drone and helicopter flights.

**Metric Performance:**

SDG&E began tracking helicopter/flight accidents and incidents in 2013. From 2013 through 2023, SDG&E has flown a total of 22,905 hours, and since 2018 has flown 10,318 Unmanned Aerial System (UAS) flights. Monthly historical data for years 2014 through 2023 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. 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)*

	2019	2020	2021	2022	2023
Number of Occurrences	Data collection began in 2022			18	28
Percentage of Total Wires Down				18.18%	22.95%

**Metric Background:**

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.

**Metric Performance:**

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.

There are several programs to proactively replace high-risk overhead conductors to mitigate against wire down events. The Covered Conductor (CC) and Strategic Underground (SUG)

programs include activities to reduce the likelihood of risk events from occurring in areas such as those located in the High Fire Threat District (HFTD) Tiers 2 and 3. Additionally, the Overhead Public Safety (OPS) program replaces remaining small wire conductors that are in proximity to the public (e.g., near schools, freeways, and high profile areas) to mitigate risk associated with a wire down event.

As noted in Metric #1, during a review of the 2023 data, it was noted that certain instances of wire down events were double counted in the data for this metric in 2022. The above chart and the historical data presented in Attachment B have been revised to reflect the amended data.

**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)*

	2019	2020	2021	2022	2023
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	0.01%	0.00%	0.00%	0.00%	0.00%
Distribution Patrols	0.00%	0.00%	0.00%	0.00%	0.00%

**Metric Background:**

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.

**Metric Performance:**

No electric transmission patrols or inspections were missed.

**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	2019	2020	2021	2022	2023
	Data collection began in June 2022			7.90%	7.71%

**Metric Background:**

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.

**Metric Performance:**

This metric was introduced in 2021, and SDG&E did not previously track data responsive to this metric. SDG&E’s Geographical Information System (GIS) system is a live “as-built” system and SDG&E did not maintain historical GIS information to query 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)*

2019 Trans   Dist	2020 Trans   Dist	2021 Trans   Dist	2022 Trans   Dist	2023 Trans   Dist
0%   0%	0%   0%	0%   0%	0%   0%	0%   0%

**Metric Background:**

When SDG&E becomes aware of being out of compliance with 49 CFR or the CPUC General Orders, the Company acts to investigate, rectify, and learn from, the matter 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 field resolution, updates of internal gas standards, internal employee training, and/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.

**Metric Performance:**

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.”

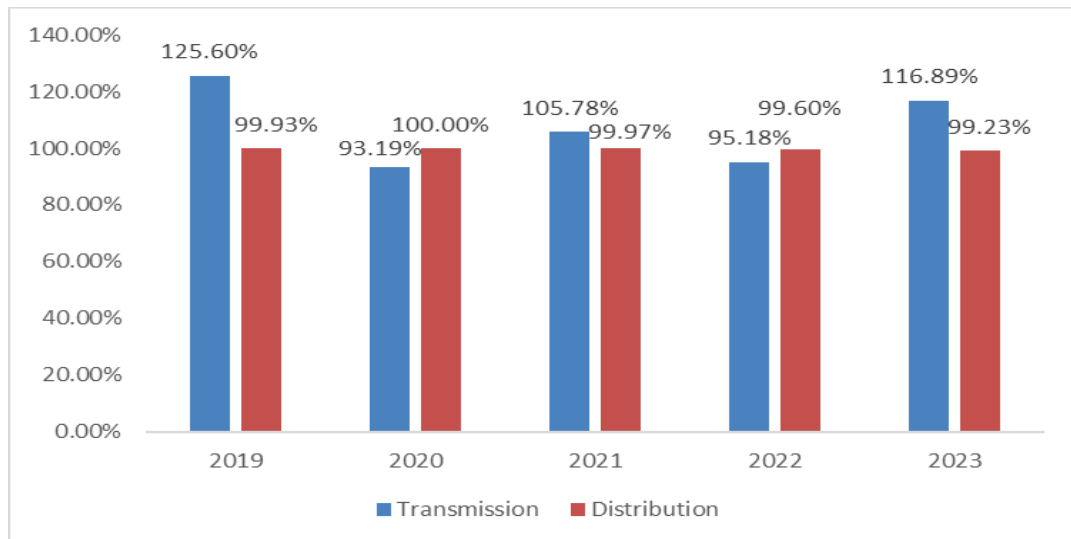
**Risks:** Electric Safety and Wildfire.

**Category:** Electric.

**Units:** Percentage of corrective actions completed.

**Summary:**

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



**Metric Background:**

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 or 6 months as specified in GO 95, Rule 18, “Nonconformances that create a fire risk located in Tier 3 of the High Fire-Threat District.” 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 falls under 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.

**Metric Performance:**

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.

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. For example, a job may be mislabeled within our notification tracking system or 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(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)*

Year	2019	2020	2021	2022	2023
Transmission	0	0	0	0	0
Distribution	0	0	0	0	1

**Metric Background:**

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 (also referred to as “Segment MAOP”) 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. Operating in excess of the MAOP can lead to equipment damage, leaks, and hazardous conditions. Each piping component and segment of the gas transmission and distribution systems are designed and operated based on this concept. Control systems are required to maintain pressure at or below MAOP, and secondary pressure relief or pressure limiting devices are 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

**Metric Performance:**

The overpressure reporting criteria established by GO 112-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.

In 2023, SDG&E had one (1) overpressure event where the pipeline with MAOP of 60 PSIG reached a pressure of 73.61 PISG. After investigating this event and determining root cause of the overpressure, SDG&E implemented necessary corrective actions.

**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	2019	2020	2021	2022	2023
Missed Inspections	0	0	0	2	3

### Metric Background:

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.<sup>73</sup> 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.

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 2014 through 2023 in the accompanying Excel file (Attachment B).

### Metric Performance:

In 2023, SDG&E temporarily missed three inline inspection deadlines due to unforeseen and extenuating circumstances. Among them were newly discovered threats which required implementation, planning, and execution of new inspection methodologies not included in the original assessment plans. Additionally, there were system operational constraints to manage due to the potential of having multiple pipelines concurrently out of service. Because of these unplanned

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<sup>73</sup> 49 CFR §§ 192.710 and 192.939.

issues, SDG&E was unable to complete the inline inspections prior to their due dates however, each instance included proper regulatory reporting and communication (to both PHMSA and CPUC) with a justification and an action plan for resolution.

**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 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	2023
Rate: Number of wire down occurrences per circuit mile X 1,000	0.00	0.00
Total Transmission wires down (excluding MEDs and secondary wires) included in metric #1	0	0
Total T&D circuit miles (excludes underground circuit miles)	8,411	8,380

Overhead Conductor Safety Index - Distribution	2022	2023
Rate: Number of wire down occurrences per circuit mile X 1,000	11.77	14.56
Total Distribution wires down (excluding MEDs and secondary wires) included in metric #1)	99	122
Total T&D circuit miles (excludes underground circuit miles)	8,411	8,380

**Metric Background:**

The Overhead Conductor Safety Index Metric was adopted by the Commission in D.21-11-009. SDG&E keeps thorough records of inspections and maintenance performed on the electric transmission and distribution systems; however, 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 and December 31, 2023. As noted in SDG&E’s 2021 SPMR (submitted July 29, 2022), for this metric, SDG&E 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.

**Metric Performance:**

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 2023.

As noted in Metric #1, during a review of the 2023 data, it was noted that certain instances of wire down events were double counted in the data for this metric in 2022. The above chart and the historical data presented in Attachment B have been revised to reflect the amended data.

**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]

## 2023 SAFETY PERFORMANCE METRICS REPORT

### METRIC 1

#### TRANSMISSION AND DISTRIBUTION (T&D) OVERHEAD WIRES DOWN - NON-MAJOR EVENT DAYS

#### 2014-2023

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014	4	12	8	9	6	3	2	4	7	1	7	9	72
2	2015	9	7	6	3	0	6	7	3	5	3	7	4	60
3	2016	39	18	9	6	6	10	6	8	8	7	8	11	136
4	2017	52	19	4	6	2	6	7	7	9	6	6	5	129
5	2018	15	10	7	6	4	3	11	10	2	12	5	11	96
6	2019	9	21	14	10	4	4	9	6	9	6	13	7	112
7	2020	7	12	9	8	4	7	6	4	8	3	12	9	89
8	2021	13	9	4	7	12	5	4	9	3	16	3	24	109
9	2022	8	12	7	4	4	8	7	7	8	11	13	10	99
10	2023	16	19	25	9	7	5	8	10	6	7	6	4	122

Metric Description	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; a conductor is considered energized unless confirmed in an idle state (i.e. normally de-energized); excludes down secondary distribution wires and “Major Event Days” (typically due to severe storm events) as defined by the IEEE.
Units	Number of wires down events

## 2023 SAFETY PERFORMANCE METRICS REPORT

### METRIC 2

#### TRANSMISSION AND DISTRIBUTION (T&D) OVERHEAD WIRES DOWN - MAJOR EVENT DAYS

##### 2014-2023

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014	4	12	8	9	6	3	3	4	7	1	7	9	73
2	2015	9	8	6	3	0	6	7	3	5	3	6	4	60
3	2016	40	19	9	6	5	10	6	11	9	7	8	12	142
4	2017	54	19	4	6	3	6	7	8	9	7	7	5	135
5	2018	15	10	7	6	4	3	11	10	2	12	5	11	96
6	2019	9	21	14	10	4	4	9	6	9	6	13	7	112
7	2020	7	12	9	8	4	7	6	18	32	8	37	31	179
8	2021	68	17	22	20	26	14	18	24	17	39	10	66	341
9	2022	25	30	19	16	19	28	13	20	47	43	55	24	339
10	2023	95	81	76	27	13	16	25	59	15	15	28	12	462

Metric Description	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; a conductor is considered energized unless confirmed in an idle state (i.e. normally de-energized); includes down secondary distribution wires. Includes "Major Event Days" (typically due to severe storm events) as defined by the IEEE.
Units	Number of wires down events

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 3**  
**ELECTRIC EMERGENCY RESPONSE TIME**  
**2014-2023**

Line No.	Year		January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014	avg	61.46	73.15	61.38	67.68	63.14	61.20	57.88	68.65	113.99	67.70	76.62	64.73	70.52
		med	43.52	52.55	39.75	44.72	37.25	36.18	44.21	45.57	54.47	40.45	46.89	47.37	44.31
2	2015	avg	56.73	79.50	63.65	63.81	74.13	73.65	74.37	63.42	74.08	69.67	67.01	65.10	68.64
		med	35.13	50.05	38.21	46.58	41.16	44.67	51.82	43.77	41.89	46.62	44.35	39.90	43.73
3	2016	avg	154.64	96.23	61.64	56.05	58.36	66.30	65.28	72.83	75.71	67.18	74.65	69.46	80.76
		med	66.47	55.95	43.68	37.14	40.73	39.80	45.27	40.83	47.22	44.07	46.40	46.87	46.67
4	2017	avg	125.66	73.38	64.28	65.39	65.69	76.84	72.89	69.48	76.21	71.40	64.25	76.61	77.83
		med	58.80	41.05	40.60	37.60	42.41	47.80	45.92	42.35	50.34	46.18	42.87	46.47	45.62
5	2018	avg	79.20	74.81	66.21	60.29	57.39	73.50	65.92	74.93	73.27	64.86	69.28	79.76	70.11
		med	49.82	46.95	44.22	41.64	39.26	46.03	47.90	52.35	46.03	42.37	39.83	42.87	44.53
6	2019	avg	86.30	64.08	55.68	70.58	58.05	65.10	66.79	66.89	60.33	66.60	80.02	44.81	65.75
		med	42.32	43.76	37.67	40.25	41.09	44.80	44.87	44.78	39.98	40.56	46.87	34.37	42.40
7	2020	avg	46.70	48.19	44.06	52.27	42.34	44.87	48.76	51.85	47.62	43.51	39.04	51.11	46.57
		med	39.92	37.30	38.88	31.82	31.02	33.15	36.99	32.73	34.82	34.70	31.67	35.04	34.62
8	2021	avg	46.37	41.69	48.47	40.32	47.96	42.45	48.59	68.39	56.17	56.04	49.85	54.63	49.71
		med	34.60	35.00	36.39	30.45	39.10	30.40	37.09	43.20	40.94	38.00	32.43	38.16	35.91
9	2022	avg	44.31	45.74	44.92	45.14	46.00	47.55	45.28	43.45	51.29	44.84	47.24	52.58	46.59
		med	36.26	35.61	28.90	31.67	28.80	30.48	32.72	28.87	34.20	41.73	42.33	39.17	33.09
10	2023	avg	56.70	56.55	44.96	41.56	41.52	40.92	43.14	49.37	51.81	44.27	44.13	43.98	47.15
		med	36.97	37.37	33.00	32.91	32.00	30.65	31.26	38.00	37.00	33.60	32.41	33.28	34.16

Metric Description	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, Section 123.2 (c) as supplemental information, not as a metric.
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.

2023 SAFETY PERFORMANCE METRICS REPORT

The below is presented as supplemental information as noted in the metric description for Metric #3 - 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, Section 123.2 (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	Count of ≥ 60 Min
<b>2014</b>	21	44	94	163	154	131	148	120	76	93	63	57	733
<b>1</b>	0	0	8	13	10	8	14	9	2	7	4	7	45
<b>2</b>	2	5	6	9	14	10	16	8	8	5	4	7	79
<b>3</b>	1	4	5	15	10	14	11	14	7	4	2	3	57
<b>4</b>	3	6	10	17	18	11	13	9	4	8	9	3	70
<b>5</b>	3	9	7	17	11	16	22	11	9	9	4	7	61
<b>6</b>	1	7	6	20	13	7	14	8	7	10	0	3	48
<b>7</b>	3	3	10	14	19	7	8	9	5	9	10	6	54
<b>8</b>	0	3	9	7	8	10	12	11	10	6	8	2	57
<b>9</b>	1	2	7	14	13	15	10	8	6	10	4	3	89
<b>10</b>	4	1	10	12	10	14	5	12	7	9	4	5	45
<b>11</b>	0	2	10	9	15	9	16	13	3	7	7	3	66
<b>12</b>	3	2	6	16	13	10	7	8	8	9	7	8	62

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	Count of ≥ 60 Min
<b>2015</b>	28	39	64	139	147	153	136	116	96	72	72	47	691
<b>1</b>	1	4	10	9	9	17	14	8	9	6	4	2	35
<b>2</b>	0	2	3	8	12	6	5	7	4	8	4	6	48
<b>3</b>	5	1	4	9	15	13	11	9	7	4	5	2	48
<b>4</b>	3	3	5	13	15	14	10	9	6	7	5	9	59
<b>5</b>	4	3	4	11	11	13	10	11	7	5	3	3	53
<b>6</b>	4	3	7	6	8	11	20	3	10	6	6	6	54
<b>7</b>	2	6	5	5	14	6	12	12	5	10	7	1	75
<b>8</b>	2	5	2	20	15	15	13	11	12	6	9	4	71
<b>9</b>	1	4	6	24	14	18	11	11	9	4	5	4	72
<b>10</b>	0	1	3	10	9	12	11	6	12	7	7	4	54
<b>11</b>	3	3	9	12	11	13	8	14	8	4	11	4	62
<b>12</b>	3	4	6	12	14	15	11	15	7	5	6	2	60

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	Count of ≥ 60 Min
<b>2016</b>	19	38	103	161	161	185	158	117	105	106	89	78	861
<b>1</b>	1	3	7	10	17	12	19	10	15	13	10	7	149
<b>2</b>	2	5	10	12	11	15	7	8	9	8	7	7	94
<b>3</b>	3	5	6	18	16	21	8	7	7	5	8	9	69
<b>4</b>	2	1	13	14	11	18	12	10	5	10	3	7	45
<b>5</b>	2	4	9	6	6	18	11	12	6	12	5	5	43
<b>6</b>	2	1	10	16	16	16	15	14	7	5	9	5	65
<b>7</b>	1	3	5	17	9	14	8	8	9	8	8	2	59
<b>8</b>	0	4	8	18	13	17	21	16	11	8	12	6	64
<b>9</b>	1	1	9	14	14	13	19	7	8	12	5	6	75
<b>10</b>	2	6	10	11	21	11	7	10	12	8	6	7	65
<b>11</b>	2	2	8	10	11	13	16	10	8	9	6	6	66
<b>12</b>	1	3	8	15	16	17	15	5	8	8	10	11	67

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	Count of ≥ 60 Min
<b>2017</b>	22	33	85	141	176	191	176	135	125	115	87	65	878
<b>1</b>	6	1	4	13	13	17	21	16	17	18	11	8	143
<b>2</b>	3	4	6	17	17	15	17	16	6	9	11	5	70
<b>3</b>	2	5	6	12	16	18	8	13	6	10	11	8	48
<b>4</b>	1	6	6	16	15	20	10	9	10	3	1	6	59
<b>5</b>	0	5	8	10	19	19	19	11	17	5	9	4	66
<b>6</b>	0	3	9	19	10	16	13	10	7	12	8	5	80
<b>7</b>	1	2	3	3	12	11	18	7	12	8	5	3	60
<b>8</b>	3	3	8	14	16	23	16	11	10	14	7	4	70
<b>9</b>	1	0	8	9	10	13	13	12	7	8	4	5	74
<b>10</b>	1	0	9	5	16	15	15	5	9	8	7	7	59
<b>11</b>	0	2	10	13	15	13	11	11	8	7	6	7	62
<b>12</b>	4	2	8	10	17	11	15	14	16	13	7	3	87

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	Count of ≥ 60 Min
<b>2018</b>	17	33	99	142	173	217	172	159	141	114	91	80	870
<b>1</b>	0	2	10	7	12	23	16	7	14	8	4	7	86
<b>2</b>	2	1	12	9	6	21	15	8	15	11	5	5	73
<b>3</b>	6	9	9	10	15	17	15	13	14	6	12	4	79
<b>4</b>	2	3	5	9	18	16	18	11	8	12	6	4	56
<b>5</b>	0	1	7	13	14	23	15	17	8	12	7	4	56
<b>6</b>	0	1	6	17	17	20	19	14	11	12	8	13	81
<b>7</b>	2	2	7	18	14	14	14	8	11	11	8	7	78
<b>8</b>	0	2	5	14	12	13	7	23	10	9	8	11	82
<b>9</b>	0	2	8	11	11	10	10	11	9	13	7	2	61
<b>10</b>	2	4	8	8	20	19	14	10	15	4	11	12	66
<b>11</b>	0	4	10	13	18	23	16	24	15	5	10	6	73
<b>12</b>	3	2	12	13	16	18	13	13	11	11	5	5	79

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	Count of ≥ 60 Min
<b>2019</b>	17	45	112	170	197	221	175	157	127	103	92	86	824
1	1	4	4	9	17	21	16	13	8	6	6	5	76
2	1	2	10	17	24	15	16	17	21	11	9	12	84
3	2	2	10	15	12	19	12	17	8	8	11	7	50
4	1	3	9	12	12	22	10	12	6	5	3	6	63
5	0	5	9	18	17	16	11	11	11	8	1	7	64
6	4	0	8	9	14	21	10	15	9	6	9	9	64
7	3	5	6	11	12	24	10	11	18	9	9	7	74
8	1	5	7	20	13	10	23	8	11	7	7	8	74
9	1	6	10	17	19	9	19	16	7	10	9	4	67
10	2	7	11	12	13	22	19	16	8	16	10	8	65
11	0	3	15	8	23	27	10	13	10	10	9	5	96
12	1	3	13	22	21	15	19	8	10	7	9	8	47

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	Count of ≥ 60 Min
<b>2020</b>	11	61	130	242	281	262	229	186	136	124	109	100	525
1	0	2	5	9	11	21	7	13	14	10	7	5	31
2	1	4	5	15	13	17	25	21	12	14	4	5	47
3	2	4	7	12	25	16	12	8	8	12	10	11	42
4	0	8	9	20	24	21	12	15	8	5	8	8	34
5	1	6	13	20	27	32	20	12	11	16	12	4	41
6	0	8	18	26	43	25	19	22	10	12	11	12	55
7	1	6	18	17	22	23	19	21	14	8	11	7	53
8	2	7	12	21	27	19	21	9	8	10	7	12	46
9	1	3	8	26	31	23	17	17	13	12	9	9	49
10	1	3	15	22	19	20	25	18	10	11	11	13	40
11	0	2	10	35	22	23	28	12	15	10	11	8	33
12	2	8	10	19	17	22	24	18	13	4	8	6	54



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	Count of ≥ 60 Min
<b>2021</b>	69	44	173	220	263	285	216	173	177	144	110	108	642
1	5	10	22	34	30	38	24	20	24	19	15	6	77
2	3	4	11	18	26	22	26	17	21	12	7	7	49
3	1	6	10	24	27	14	22	20	10	17	9	7	54
4	17	1	10	17	28	19	19	10	10	9	6	5	37
5	5	4	7	22	28	20	15	7	14	17	18	5	50
6	8	6	19	36	31	31	14	16	13	9	16	17	50
7	4	4	8	14	20	22	27	25	9	18	10	9	52
8	7	0	34	0	0	45	0	0	32	0	0	22	64
9	4	2	11	17	16	15	12	15	11	12	8	8	56
10	5	1	12	12	23	20	20	22	11	13	8	8	64
11	5	2	8	12	19	16	23	10	4	11	6	2	33
12	5	4	21	14	15	23	14	11	18	7	7	12	56

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	Count of ≥ 60 Min
<b>2022</b>	50	57	176	193	245	276	164	131	142	98	63	106	500
1	6	1	2	15	27	10	10	11	9	14	8	5	36
2	1	5	8	15	28	20	10	20	11	7	10	10	39
3	5	0	36	2	1	53	1	2	25	1	2	21	35
4	0	4	11	26	27	19	20	10	11	11	4	8	33
5	7	1	42	0	2	49	2	2	24	1	0	16	36
6	7	6	8	19	33	18	12	8	11	7	6	10	45
7	4	4	11	17	28	21	22	18	12	9	3	4	40
8	3	16	8	17	26	22	12	8	3	4	7	5	41
9	5	7	12	20	16	23	19	11	10	9	7	5	55
10	5	3	10	23	16	15	20	9	9	13	9	7	42
11	4	7	17	23	23	14	20	14	6	15	4	11	46
12	3	3	11	16	18	12	16	18	11	7	3	4	52

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	Count of ≥ 60 Min
<b>2023</b>	46	42	128	225	260	234	207	165	123	111	101	76	532
<b>1</b>	6	5	15	18	27	22	25	14	8	19	10	17	64
<b>2</b>	1	1	16	22	23	23	14	10	15	11	7	6	64
<b>3</b>	3	4	9	30	31	23	31	17	9	11	15	7	57
<b>4</b>	9	0	7	18	21	24	13	9	11	9	12	7	30
<b>5</b>	5	3	9	12	23	24	9	13	13	5	11	3	29
<b>6</b>	3	4	11	19	27	22	12	18	8	7	10	7	28
<b>7</b>	5	6	16	19	22	14	16	9	10	11	4	3	41
<b>8</b>	6	8	9	25	22	20	22	20	15	12	10	14	68
<b>9</b>	0	1	8	10	12	14	16	17	5	5	5	3	45
<b>10</b>	4	3	7	13	16	15	23	12	9	5	6	4	34
<b>11</b>	4	4	12	24	17	20	12	13	12	8	4	2	43
<b>12</b>	0	3	9	15	19	13	14	13	8	8	7	3	29

## 2023 SAFETY PERFORMANCE METRICS REPORT

### METRIC 4

### FIRE IGNITIONS

#### 2014-2023

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014	1	0	1	8	6	7	3	1	0	2	1	0	30
2	2015	0	2	1	7	2	1	4	4	6	4	0	1	32
3	2016	4	3	2	2	0	4	6	1	4	2	2	0	30
4	2017	1	0	0	0	0	6	3	2	4	5	0	2	23
5	2018	0	2	0	4	2	5	4	2	2	3	1	1	26
6	2019	1	0	0	1	0	1	5	2	4	4	3	0	21
7	2020	1	2	0	0	2	3	4	4	8	2	2	1	29
8	2021	0	1	2	0	5	4	6	3	0	1	1	2	25
9	2022	1	0	1	0	4	3	5	2	2	2	0	0	20
10	2023	0	0	0	3	1	1	4	3	0	2	1	1	16

Metric Description	The number of fire incidents annually reportable to the California Public Utilities Commission (CPUC) per Decision 14-02-015.
Units	Number of ignitions

**2023 SAFETY PERFORMANCE METRICS REPORT**

**METRIC 5**

**GAS DIG-INS**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	YTD
1	2014	2.18	2.10	1.54	2.53	2.81	2.57	2.01	2.22	3.27	2.94	2.67	1.70	2.40
2	2015	3.29	2.83	2.48	2.56	2.88	1.84	2.44	2.48	3.71	2.23	4.29	2.48	2.77
3	2016	2.42	2.65	2.26	2.25	2.92	3.46	2.98	2.04	2.85	2.37	3.08	2.57	2.65
4	2017	2.50	1.79	2.67	2.81	2.06	2.38	3.52	2.58	3.61	3.84	2.63	2.72	2.77
5	2018	2.33	2.67	2.25	2.50	2.95	3.37	3.09	3.76	3.04	3.22	2.66	1.89	2.83
6	2019	1.76	1.71	2.34	2.70	2.40	3.02	2.93	2.75	2.76	2.68	2.40	1.86	2.46
7	2020	1.19	1.99	2.03	1.20	2.05	0.97	1.58	2.32	1.74	1.65	1.62	1.17	1.61
8	2021	1.44	1.49	1.60	1.80	1.67	1.72	1.98	1.48	0.93	1.56	1.34	1.46	1.54
9	2022	1.15	1.20	1.24	1.01	1.88	1.17	1.22	1.17	1.15	1.01	1.48	0.63	1.19
10	2023	0.47	1.25	0.71	1.27	0.66	1.26	1.51	1.16	1.21	1.55	0.89	1.39	1.11

Metric Description	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 3rd party dig-in is damage caused by someone other than the utility or a utility contractor.
Units	The number of 3rd party gas dig-ins per 1,000 USA tags/tickets

**2023 SAFETY PERFORMANCE METRICS REPORT**

**METRIC 6**

**GAS IN-LINE INSPECTION**

**2014-2023**

**"Miles Inspected"**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual Miles	Annual Percentage
1	2014													59	6%
2	2015													10	2%
3	2016													100	22%
4	2017													60	13%
5	2018													1	0%
6	2019													50	11%
7	2020													62	14%
8	2021													115	20%
9	2022													1	0%
10	2023													114	14%

Metric Description	Total miles of transmission pipelines inspected annually by inline inspection (ILI) and percentage of transmission pipelines inspected annually by inline inspections.
Units	Total number of miles of inspections performed and percentage inspected by ILI.

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 7**  
**GAS IN-LINE INSPECTION UPGRADE**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual Miles
1	2014													13.40
2	2015													4.71
3	2016													0.99
4	2017													0.00
5	2018													0.04
6	2019													0.83
7	2020													1.26
8	2021													0.03
9	2022													0.00
10	2022													8.00

Metric Description	Miles of gas transmission lines upgraded annually to permit inline inspections.
Units	Miles of gas transmission lines upgraded annually to permit inline inspections.

**2023 SAFETY PERFORMANCE METRICS REPORT**

**METRIC 8**

**GAS SHUT-IN TIME - MAINS**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	YTD
1	2014													
2	2015													
3	2016													
4	2017	1077.00	849.50	856.07	390.00	1431.00	533.50	997.00	720.00	502.50	540.00	800.00	633.00	729.50
5	2018	708.50	681.50	920.00	488.50	359.00	96.00	118.00	635.00	554.00	785.00	664.00	630.00	611.00
6	2019	456.50	601.00	854.50	669.00	949.50	482.00	768.50	707.50	168.00	520.00	656.50	1116.00	650.00
7	2020	649.00	390.50	479.50	794.00	190.00	462.00	683.50	491.50	543.50	620.50	454.00	778.00	580.50
8	2021	900.00	891.00	765.00	1547.50	767.00	755.00	747.00	795.00	827.50	1571.00	1064.00	804.50	871.00
9	2022	1178.50	425.92	574.00	884.00	908.50	919.00	1024.50	630.50	713.00	885.00	515.00	922.00	833.00
10	2023	689.11	403.00	544.00	398.86	217.00	381.00	315.00	465.00	131.78	154.68	201.08	491.50	416.00

Metric Description	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, Section 123.2 (c) as supplemental information, not as a metric.
Units	Time in minutes required to stop the flow of gas for Distribution Mains

The table below is presented as supplemental information as noted in the metric description for Metric #8: "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, Section 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
2023	Main	0	0	0	1	0	0	0	0	1	6	83
2022	Main	0	0	0	0	0	0	1	2	1	5	156
2021	Main	0	0	0	0	0	0	0	1	0	3	145
2020	Main	0	0	0	0	1	0	1	4	5	10	187
2019	Main	0	0	0	1	0	0	2	0	2	12	232
2018	Main	1	0	0	0	0	0	3	1	1	8	252
2017	Main	0	0	0	1	1	1	2	2	0	7	216



## 2023 SAFETY PERFORMANCE METRICS REPORT

### METRIC 9

#### GAS SHUT-IN TIME - SERVICES

#### 2014-2023

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015													
3	2016													
4	2017	479.00	417.78	135.00	125.00	150.00	227.50	101.00	125.00	99.00	103.50	176.00	191.00	155.00
5	2018	166.00	171.50	145.00	121.00	100.00	104.00	132.00	92.00	106.00	105.00	118.00	264.00	121.00
6	2019	128.50	142.50	218.50	117.50	101.00	99.00	94.00	83.00	86.50	69.00	118.53	163.00	115.00
7	2020	170.00	110.00	182.00	172.50	80.00	97.00	73.00	70.50	63.00	82.00	81.00	99.50	94.00
8	2021	130.00	667.00	117.00	127.00	175.00	166.50	129.00	135.50	124.50	141.50	192.00	137.00	127.00
9	2022	135.00	115.22	91.74	136.00	111.86	69.40	86.00	91.00	67.00	79.00	137.18	139.73	98.08
10	2023	154.00	105.18	120.41	80.25	114.00	80.01	65.78	59.00	93.06	59.55	110.00	72.95	88.58

Metric Description	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, Section 123.2 (c) as supplemental information, not as a metric.
Units	Monthly: Time in minutes required to stop the flow of gas for Distribution Services Annual: Average (median) response time in minutes

The table below is presented as supplemental information as noted in the metric description for Metric #9: "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, Section 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
2023	Services	1	0	4	3	2	11	22	27	30	60	343
2022	Services	0	0	2	3	8	12	20	33	27	73	388
2021	Services	0	1	1	3	6	7	8	14	7	41	315
2020	Services	0	2	4	6	12	20	23	27	27	82	434
2019	Services	1	1	3	8	15	18	34	30	35	108	604
2018	Services	0	3	2	10	17	26	27	42	31	103	773
2017	Services	0	0	3	6	16	22	26	28	25	62	817

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 10**  
**CROSS BORE INTRUSIONS**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2014													
4	2015													
7	2016													
10	2017													
13	2018													
16	2019													
19	2020													
22	2021													
25	2022													
28	2023													

Metric Description	Cross bore intrusions found per 1,000 inspections, reported on an annual basis.
Units	Number of cross bore intrusions per 1,000 inspections

**Not Applicable - SDG&E completed its Sewer Lateral Inspection project in 2012**

**2023 SAFETY PERFORMANCE METRICS REPORT**

**METRIC 11**

**GAS EMERGENCY RESPONSE TIME**

**2014-2023**

**MEDIAN MINUTES**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015													
3	2016													
4	2017	87.41	61.00	52.90	42.00	40.00	43.00	43.00	32.00	29.00	23.50	25.00	29.00	36.00
5	2018	31.50	20.00	29.00	30.00	27.00	32.50	29.00	30.00	25.00	30.00	31.00	30.00	29.00
6	2019	30.00	30.00	30.00	23.00	18.00	25.00	30.00	28.00	28.00	25.50	31.00	30.00	27.56
7	2020	29.00	28.16	26.00	26.00	27.00	26.00	26.00	27.00	27.00	27.00	28.00	27.13	27.00
8	2021	27.11	27.20	26.18	26.72	25.91	26.18	26.88	25.00	25.00	27.03	27.00	28.00	26.73
9	2022	27.00	27.02	26.66	26.00	23.98	24.40	24.81	25.30	27.00	25.26	27.60	26.30	26.08
10	2023	25.88	26.53	26.73	26.11	25.36	26.20	24.80	24.90	25.90	26.00	25.90	25.60	25.90

**METRIC 11**

**GAS EMERGENCY RESPONSE TIME**

**2014-2023**

**AVERAGES**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015													
3	2016													
4	2017	74.37	69.62	103.93	542.78	359.10	59.60	305.35	54.30	47.99	39.26	160.67	130.63	145.78
5	2018	37.20	46.59	69.89	72.31	41.27	37.83	76.34	75.51	37.70	48.76	40.45	37.47	52.77
6	2019	38.76	37.73	40.35	41.22	38.69	37.29	54.02	59.33	51.93	41.57	39.10	40.62	43.04
7	2020	30.61	30.63	30.04	29.51	30.30	29.27	31.32	29.21	28.91	32.47	30.68	30.65	30.36
8	2021	30.14	28.47	28.38	29.04	28.94	27.98	28.60	26.51	27.92	30.44	30.08	30.65	29.06
9	2022	29.90	30.30	29.00	28.40	25.70	26.10	26.90	28.50	29.70	27.10	30.40	28.70	28.60
10	2023	28.50	28.10	29.00	28.30	27.50	28.80	27.20	26.70	28.45	28.80	29.00	27.90	28.30

Metric Description	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, Section 123.2 (c) as supplemental information, not as a metric.
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.

The tables below are 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, Section 123.2 (c) as supplemental information, not as a metric."

2023													
Operating Periods and Units	Hazardous Leak Response Count	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	
<b>Business Hours (M-F 0800-1700)</b>													
San Diego ( SAN DIEGO 1st Operator's Responder On Scene	4004	84	161	390	597	720	592	420	354	269	279	138	
<b>After Business Hours (M-F 1701-0759)</b>													
San Diego ( SAN DIEGO 1st Operator's Responder On Scene	1604	29	37	132	221	310	223	214	153	97	136	52	
<b>Weekends/Holidays</b>													
San Diego ( SAN DIEGO 1st Operator's Responder On Scene	1518	30	38	122	213	252	259	175	110	103	139	77	
2022													
Operating Periods and Units	Hazardous Leak Response Count	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	
<b>Business Hours (M-F 0800-1700)</b>													
San Diego ( SAN DIEGO 1st Operator's Responder On Scene	4109	155	127	385	580	694	625	458	369	257	363	96	
<b>After Business Hours (M-F 1701-0759)</b>													
San Diego ( SAN DIEGO 1st Operator's Responder On Scene	1648	31	33	119	226	282	253	222	176	113	151	42	
<b>Weekends/Holidays</b>													
San Diego ( SAN DIEGO 1st Operator's Responder On Scene	1524	48	34	104	210	281	245	152	133	83	178	56	

2021														
Operating Periods and Units	Hazardous Leak Response Count	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		
<b>Business Hours (M-F 0800-1700)</b>														
San Diego ( SAN DIEGO 1st Operator's Responder On Scene	4578	121	151	344	690	816	754	556	407	276	364	99		
SDG&E 1st Operator's Responder On Scene	17	0	3	1	3	3	1	2	2	1	0	1		
<b>After Business Hours (M-F 1701-0759)</b>														
San Diego ( SAN DIEGO 1st Operator's Responder On Scene	1750	47	43	120	225	291	311	210	178	124	163	38		
SDG&E 1st Operator's Responder On Scene	7	0	0	0	3	3	0	0	0	0	1	0		
<b>Weekends/Holidays</b>														
San Diego ( SAN DIEGO 1st Operator's Responder On Scene	1626	30	32	104	201	258	225	221	146	117	200	92		
SDG&E 1st Operator's Responder On Scene	9	1	1	1	1	2	2	0	0	0	1	0		

2020														
Operating Periods and Units	Hazardous Leak Response Count	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		
<b>Business Hours (M-F 0800-1700)</b>														
San Diego ( SAN DIEGO 1st Operator's Responder On Scene	5557	124	151	467	828	932	872	715	489	352	525	102		
SDG&E 1st Operator's Responder On Scene	32	2	1	5	6	6	3	2	2	3	2	0		
<b>After Business Hours (M-F 1701-0759)</b>														
San Diego ( SAN DIEGO 1st Operator's Responder On Scene	2117	47	41	142	238	361	300	311	193	160	244	80		
SDG&E 1st Operator's Responder On Scene	11	0	0	0	1	3	1	3	0	2	1	0		
<b>Weekends/Holidays</b>														
San Diego ( SAN DIEGO 1st Operator's Responder On Scene	1968	49	36	104	230	315	309	224	207	146	215	133		
SDG&E 1st Operator's Responder On Scene	7	0	0	1	1	2	1	1	0	0	0	1		

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 12**  
**NATURAL GAS STORAGE BASELINE INSPECTIONS PERFORMED**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY Well Baseline Inspections	EOY % Progress to Goal <sup>b</sup>
1	2014														
2	2015														
3	2016														
4	2017														
5	2018														
6	2019														
7	2020														
8	2021														
9	2022														
10	2023														

Metric Description	Metric tracks the progress of completing baseline and reassessment inspections that were expected to be completed within a given year. It reports the number of storage well periodic baseline assessments completed as a percentage of the number scheduled to be completed in the period. The number scheduled will depend on any regulatory required inspections as well as any initiated by the utility.
Units	Number of Assessments completed/Number scheduled or targeted.

**Not Applicable - SDG&E does not have any storage assets**

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 13**  
**GAS PIPELINES THAT CAN BE INTERNALLY INSPECTED**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual Miles	Annual Percentage
1	2014													144	62%
2	2015													144	63%
3	2016													44	64%
4	2017													143	61%
5	2018													144	62%
6	2019													142	64%
7	2020													142	65%
8	2021													147	68%
9	2022													147	69%
10	2023													157	72%

Metric Description	Total miles and percent of system that can be internally inspected ("pigged") relative to all transmission pipelines in the system.
Units	Miles and percentage that can be ILI'd



**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 14**  
**EMPLOYEE DAYS AWAY, RESTRICTED AND TRANSFER (DART) RATE**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014	1.87	1.47	1.12	0.81	1.53	0.87	0.82	1.41	0.89	1.45	1.75	0.89	1.24
2	2015	2.41	0.91	1.97	1.10	0.57	0.57	0.84	1.15	1.72	1.84	1.37	0.58	1.24
3	2016	1.29	1.47	1.02	0.85	1.34	1.40	1.59	1.45	1.37	1.38	0.80	0.35	1.20
4	2017	2.98	1.71	1.06	0.61	0.26	2.60	2.04	0.50	0.89	0.27	0.00	0.64	1.07
5	2018	1.46	0.93	0.80	1.19	1.07	1.53	1.60	1.24	0.31	1.44	1.70	1.59	1.23
6	2019	2.59	1.25	0.28	1.12	1.34	0.65	0.31	0.50	1.76	1.28	0.82	0.57	1.01
7	2020	0.70	1.51	0.52	0.51	0.00	0.53	0.86	1.33	1.32	0.74	1.29	1.61	0.89
8	2021	2.88	2.51	0.46	1.48	0.77	0.55	2.00	0.76	1.09	0.99	1.27	0.36	1.25
9	2022	0.87	0.26	1.19	1.55	0.25	1.84	1.94	1.88	0.26	0.24	1.75	0.00	1.03
10	2023	0.88	0.75	1.47	0.27	0.92	2.02	1.07	0.68	2.19	0.46	0.28	0.30	0.95

Metric Description	DART Rate is calculated based on number of OSHA-recordable injuries resulting in Days Away from work and/or Days on Restricted Duty or Job Transfer, and hours worked.
Units	DART Cases times 200,000 divided by employee hours worked.

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 15**  
**Rate of Serious Injuries or Fatalities (SIF) Actual (Employee)**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014	0.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.24	0.29	0.30	0.09
2	2015	0.00	0.00	0.28	0.00	0.00	0.00	0.28	0.29	0.00	0.00	0.00	0.00	0.07
3	2016	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.24	0.00	0.00	0.00	0.00	0.02
4	2017	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5	2018	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6	2019	0.37	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
7	2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8	2021	0.00	0.00	0.00	0.00	0.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
9	2022	0.00	0.00	0.24	0.00	0.00	0.00	0.00	0.00	0.26	0.00	0.00	0.00	0.04
10	2023	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Metric Description	<p>Rate of SIF Actual<sup>2</sup> (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.</p> <p>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.</p> <p>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.</p>
Units	Number of SIF-Actual cases among employees X 200,000 / employee hours worked.

The tables below are presented as supplemental information as noted in the metric description for Metric #15 - "...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."

**Employee SIF Actuals based on OSHA Reporting Requirements**

Employee Serious Injuries													
Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
2014	1	0	0	0	0	0	0	0	0	1	1	1	4
2015	0	0	1	0	0	0	1	0	0	0	0	0	2
2016	0	0	0	0	0	0	0	1	0	0	0	0	1
2017	0	0	0	0	0	0	0	0	0	0	0	0	0
2018	0	0	0	0	0	0	0	0	0	0	0	0	0
2019	1	0	0	0	0	0	0	0	0	0	0	0	1
2020	0	0	0	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	0	0	0	0	0	0	0	0	0
2022	0	0	1	0	0	0	0	0	1	0	0	0	2
2023	0	0	0	0	0	0	0	0	0	0	0	0	0

Employee Fatalities													
Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
2014	0	0	0	0	0	0	0	0	0	0	0	0	0
2015	0	0	0	0	0	0	0	1	0	0	0	0	1
2016	0	0	0	0	0	0	0	0	0	0	0	0	0
2017	0	0	0	0	0	0	0	0	0	0	0	0	0
2018	0	0	0	0	0	0	0	0	0	0	0	0	0
2019	0	0	0	0	0	0	0	0	0	0	0	0	0
2020	0	0	0	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	1	0	0	0	0	0	0	0	1
2022	0	0	0	0	0	0	0	0	0	0	0	0	0
2023	0	0	0	0	0	0	0	0	0	0	0	0	0

Employee SIF Totals													
Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
2014	1	0	0	0	0	0	0	0	0	1	1	1	4
2015	0	0	1	0	0	0	1	1	0	0	0	0	3
2016	0	0	0	0	0	0	0	1	0	0	0	0	1
2017	0	0	0	0	0	0	0	0	0	0	0	0	0
2018	0	0	0	0	0	0	0	0	0	0	0	0	0
2019	1	0	0	0	0	0	0	0	0	0	0	0	1
2020	0	0	0	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	1	0	0	0	0	0	0	0	1
2022	0	0	1	0	0	0	0	0	1	0	0	0	2
2023	0	0	0	0	0	0	0	0	0	0	0	0	0

## 2023 SAFETY PERFORMANCE METRICS REPORT

### METRIC 16

#### Rate of SIF Actual (Contractor)

#### 2014-2023

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015													
3	2016													
4	2017	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5	2018	0.00	0.00	0.00	0.00	0.39	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.03
6	2019	0.00	0.00	0.00	0.00	0.40	0.00	0.45	0.00	0.00	0.00	0.00	0.00	0.07
7	2020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.27	0.00	0.25	0.00	0.37	0.08
8	2021	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.36	0.00	0.03
9	2022	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03
10	2023	0.00	0.00	0.00	0.00	0.00	0.24	0.00	0.00	0.24	0.00	0.00	0.00	0.05

Metric Description	Rate of SIF Actual3 (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.
Units	Number of SIF-Actual cases among contractors x 200,000/contractor hours worked

The tables below are presented as supplemental information as noted in the metric description for Metric #16 - "...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."

**Contractor SIF Actuals based on OSHA Reporting Requirements**

Contractor Serious Injuries													
Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
2014	0	0	0	0	0	0	0	1	0	2	0	0	3
2015	0	0	0	1	0	1	0	0	0	0	0	0	2
2016	0	0	0	0	0	0	0	0	1	1	0	0	2
2017	0	0	0	0	0	0	0	0	0	0	0	0	0
2018	0	0	0	0	1	0	0	0	0	0	0	0	1
2019	0	0	0	0	1	0	1	0	0	0	0	0	2
2020	0	0	0	0	0	0	0	1	0	1	0	1	3
2021	0	0	0	0	0	0	0	0	0	0	1	0	1
2022	1	0	0	0	0	0	0	0	0	0	0	0	1
2023	0	0	0	0	0	1	0	0	1	0	0	0	2

Contractor Fatalities													
Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
2014	0	0	0	0	0	0	0	0	0	0	0	0	0
2015	0	0	0	0	0	0	0	0	0	0	1	0	1
2016	0	0	0	0	0	0	0	0	0	0	0	0	0
2017	0	0	0	0	0	0	0	0	0	0	0	0	0
2018	0	0	0	0	0	0	0	0	0	0	0	0	0
2019	0	0	0	0	0	0	0	0	0	0	0	0	0
2020	0	0	0	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	0	0	0	0	0	0	0	0	0
2022	0	0	0	0	0	0	0	0	0	0	0	0	0
2023	0	0	0	0	0	0	0	0	0	0	0	0	0

Contractor SIF Totals													
Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
2014	0	0	0	0	0	0	0	1	0	2	0	0	3
2015	0	0	0	1	0	1	0	0	0	0	1	0	3
2016	0	0	0	0	0	0	0	0	1	1	0	0	2
2017	0	0	0	0	0	0	0	0	0	0	0	0	0
2018	0	0	0	0	1	0	0	0	0	0	0	0	1
2019	0	0	0	0	1	0	1	0	0	0	0	0	2
2020	0	0	0	0	0	0	0	1	0	1	0	1	3
2021	0	0	0	0	0	0	0	0	0	0	1	0	1
2022	1	0	0	0	0	0	0	0	0	0	0	0	1
2023	0	0	0	0	0	1	0	0	1	0	0	0	2

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 17**  
**RATE OF SIF POTENTIAL - EMPLOYEE**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015													
3	2016													
4	2017													
5	2018													
6	2019													
7	2020													
8	2021			0.46	0.25	0.00	0.00	0.50	0.00	0.82	0.25	0.25	0.36	0.24
9	2022	0.00	0.00	0.00	0.77	0.00	0.00	0.00	0.24	0.26	0.24	0.25	0.00	0.15
10	2023	0.00	0.00	0.24	0.00	0.46	0.00	0.54	0.45	0.27	0.23	0.00	0.00	0.19

Metric Description	Rate of SIF Potential (Employee) 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.
Units	Number of SIF Potential cases among employees x 200,000/employee hours worked



**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 18**  
**RATE OF SIF POTENTIAL - CONTRACTOR**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015													
3	2016													
4	2017													
5	2018													
6	2019													
7	2020													
8	2021	0.67	0.69	0.96	0.00	0.33	0.31	0.28	0.33	0.00	0.00	0.00	0.00	0.29
9	2022	0.00	0.31	0.58	0.30	0.32	1.17	0.00	0.00	0.00	0.27	0.33	0.33	0.30
10	2023	0.37	0.00	0.00	0.56	0.00	0.00	0.00	0.25	0.24	0.00	0.00	0.63	0.17

Metric Description	<p>Rate of SIF Potential (contractor) is calculated using the formula: Number of SIF Potential cases among contractor 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 and Classification Learning Model.</p> <p>If a utility has implemented a replicable, substantially similar evaluation methodology for assessing SIF Potential, the utility may use that method for reporting this metric. If a utility opts to report the rate of SIF Potential using a method other than the EEI Safety Classification Model, it must explain how its methodology for counting SIF Potential differs and why it chose to use it.</p> <p>As a supplemental reporting requirement to the Potential SIF Rate (contractor), all utilities shall provide information about key lessons learned from Potential SIF (contractor) incidents.</p>
Units	Number of SIF-Potential cases among contractors X 200,000 / contractor hours worked

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 19**  
**CONTRACTOR DAYS AWAY, RESTRICTED TRANSFER (DART)**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015													
3	2016													
4	2017													
5	2018	0.36	0.39	1.06	0.73	0.78	0.00	0.00	0.39	0.00	0.00	0.00	0.00	0.33
6	2019	0.45	0.00	0.36	1.15	1.59	0.00	2.27	1.22	0.45	1.32	0.91	1.49	0.93
7	2020	0.39	0.00	0.34	0.00	0.63	0.89	0.56	0.00	1.50	0.75	0.00	1.11	0.53
8	2021	0.34	0.69	0.64	0.25	0.67	0.63	0.84	0.66	0.70	0.32	1.07	0.00	0.56
9	2022	0.33	0.00	0.00	0.61	0.00	0.59	0.30	0.00	0.88	0.27	0.00	1.00	0.33
10	2023	0.37	0.36	0.58	0.28	0.55	0.48	0.28	0.00	0.73	1.31	0.30	0.00	0.45

Metric Description	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
Units	OSHA DART Rate

**2023 SAFETY PERFORMANCE METRICS REPORT**

**METRIC 20**

**PUBLIC SERIOUS INJURIES AND FATALITIES**

**2014-2023**

**A) Serious Injuries**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015	0	1	0	0	0	3	0	1	1	0	0	0	6
3	2016	0	0	1	1	0	0	0	0	0	0	0	0	2
4	2017	0	0	0	0	0	0	0	3	0	0	0	1	4
5	2018	0	0	0	0	0	0	2	0	0	0	0	0	2
6	2019	0	0	0	0	0	1	1	0	0	0	0	0	2
7	2020	0	0	0	0	0	1	0	0	1	0	0	1	3
8	2021	0	0	0	0	0	1	0	0	0	1	0	0	2
9	2022	0	0	0	0	0	0	0	0	0	0	0	0	0
10	2023	0	0	0	0	0	0	0	1	0	1	0	0	2

**METRIC 20**

**PUBLIC SERIOUS INJURIES AND FATALITIES**

**2014-2023**

**B) Fatalities**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015	0	0	0	0	0	0	0	0	0	0	0	0	0
3	2016	1	0	0	0	0	0	0	1	0	0	0	0	2
4	2017	0	0	0	0	0	0	0	0	1	0	0	0	1
5	2018	0	0	0	0	0	0	0	1	0	0	0	0	1
6	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
8	2021	0	0	0	0	0	0	0	0	0	0	0	0	0
9	2022	0	0	0	0	0	0	0	0	0	0	0	0	0
10	2023	0	0	0	0	0	0	0	1	0	0	0	0	1

Metric Description	A fatality or personal injury requiring in-patient hospitalization involving utility facilities or equipment. Equipment includes utility vehicles used during the course of business.
Units	Number of Serious Injuries

**METRIC 20**  
**PUBLIC SERIOUS INJURIES AND FATALITIES**  
**2014-2023**  
**C) Totals**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015	0	1	0	0	0	3	0	1	1	0	0	0	6
3	2016	1	0	1	1	0	0	0	1	0	0	0	0	4
4	2017	0	0	0	0	0	0	0	3	1	0	0	1	5
5	2018	0	0	0	0	0	0	2	1	0	0	0	0	3
6	2019	0	0	0	0	0	1	1	0	0	0	0	0	2
7	2020	0	0	0	0	0	1	0	0	1	0	0	1	3
8	2021	0	0	0	0	0	1	0	0	0	1	0	0	2
9	2022	0	0	0	0	0	0	0	0	0	0	0	0	0
10	2023	0	0	0	0	0	0	0	2	0	1	0	0	3

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 21**  
**HELICOPTER/FLIGHT ACCIDENT OR INCIDENT**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015													
3	2016	0	0	0	0	0	0	0	0	0	0	0	0	0
4	2017	0	0	1	0	0	0	0	0	0	0	0	0	1
5	2018	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
8	2021	0	0	0	0	0	0	0	0	0	0	0	0	0
9	2022	0	0	0	0	0	0	0	0	0	0	1	0	1
10	2023	0	0	0	0	0	0	0	0	0	0	0	0	0

Metric Description	Defined by Federal Aviation Regulations (FARs), reportable to FAA per 49-CFR-830.
Units	Number of accidents or incidents (as defined in 49 CFR Section 830.5 "Immediate Notification") per 100,000 flight hours [number of reportable accidents or incidents included here]

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 25**  
**DISTRIBUTION WIRES-DOWN NOT RESULTING IN AUTOMATIC DE-ENERGIZATION**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014	0	0	0	0	0	0	0	0	0	0	0	0	0
2	2015	0	0	0	0	0	0	0	0	0	0	0	0	0
3	2016	0	0	0	0	0	0	0	0	0	0	0	0	0
4	2017	0	0	0	0	0	0	0	0	0	0	0	0	0
5	2018	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
8	2021	0	0	0	0	0	0	0	0	0	0	0	0	0
9	2022	0.00%	8.33%	14.29%	0.00%	25.00%	37.50%	14.29%	28.57%	12.50%	45.45%	7.69%	20.00%	18.18%
10	2023	18.75%	15.79%	20.00%	33.33%	14.29%	20.00%	25.00%	30.00%	50.00%	0.00%	50.00%	25.00%	22.95%

Metric Description	Distribution System: 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.
Units	Percentage of wires down occurrences

**METRIC 25**  
**TRANSMISSION WIRES-DOWN NOT RESULTING IN AUTOMATIC DE-ENERGIZATION**  
**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014	0	0	0	0	0	0	0	0	0	0	0	0	0
2	2015	0	0	0	0	0	0	0	0	0	0	0	0	0
3	2016	0	0	0	0	0	0	0	0	0	0	0	0	0
4	2017	0	0	0	0	0	0	0	0	0	0	0	0	0
5	2018	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
8	2021	0	0	0	0	0	0	0	0	0	0	0	0	0
9	2022	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	2023	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Metric Description	Transmission System: 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.
Units	Percentage of wires down occurrences

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 26**  
**MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS**  
**2014-2023**  
**Transmission Patrols**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													0.00%
2	2015													0.00%
3	2016													0.00%
4	2017													0.00%
5	2018													0.00%
6	2019													0.00%
7	2020													0.00%
8	2021													0.00%
9	2022													0.00%
10	2023													0.00%

Metric Description	Primary Distribution: 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. 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.
Units	Percentage of structures that missed inspection relative to total required structures.



**METRIC 26**  
**MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS**  
**2014-2023**

***Transmission Inspections***

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													0.00%
2	2015													0.00%
3	2016													0.00%
4	2017													0.00%
5	2018													0.00%
6	2019													0.00%
7	2020													0.00%
8	2021													0.00%
9	2022													0.00%
10	2023													0.00%

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

**METRIC 26**  
**MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS**  
**2014-2023**

***Distribution Patrols***

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													52.00%
2	2015													0.00%
3	2016													0.00%
4	2017													0.00%
5	2018													0.07%
6	2019													0.01%
7	2020													0.00%
8	2021													0.00%
9	2022													0.00%
10	2023													0.00%

Metric Description	Transmission Overhead 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. 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.
Units	Percentage of structures that missed inspection relative to total required structures.

**METRIC 26**  
**MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS**  
**2014-2023**

***Distribution Inspections***

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													0.00%
2	2015													0.00%
3	2016													0.00%
4	2017													0.00%
5	2018													0.00%
6	2019													0.00%
7	2020													0.00%
8	2021													0.00%
9	2022													0.00%
10	2023													0.00%

Metric Description	Detailed Inspections: 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. 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.
Units	Percentage of structures that missed inspection relative to total required structures.

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 27**  
**OVERHEAD CONDUCTOR SIZE IN HIGH FIRE THREAT DISTRICT (TIERS 2 AND 3, HFTD)**  
**2014-2023**

**Percentage of #6 Copper in HFTD**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015													
3	2016													
4	2017													
5	2018													
6	2019													
7	2020													
8	2021													
9	2022						8.14%	8.11%	8.06%	8.05%	8.02%	7.98%	7.90%	7.90%
10	2023	7.88%	7.85%	7.79%	7.73%	7.89%	7.86%	7.82%	7.80%	7.79%	7.76%	7.73%	7.71%	7.71%

Metric Description	Percentage of primary distribution overhead conductors in Tiers 2 and 3 HFTD that is #6 copper. Secondary conductors are excluded.
Units	Percentage relative to total circuit miles

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 28**  
**GAS OPERATION CORRECTIVE ACTIONS BACKLOG**  
**2014-2023**  
**GAS DISTRIBUTION**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2	2015	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3	2016	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4	2017	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
5	2018	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
6	2019	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
7	2020	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
8	2021	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
9	2022	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	2023	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

Metric Description	Gas Transmission: 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 requirement in 49 CFR Part 192, or the utility's internal standards. Separate metrics are provided for gas distribution and gas transmission.
Units	Percentage of work orders past due for completion in the past calendar year

**METRIC 28**  
**GAS OPERATION CORRECTIVE ACTIONS BACKLOG**  
**2014-2023**  
**GAS TRANSMISSION**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2	2015	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3	2016	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4	2017	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
5	2018	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
6	2019	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
7	2020	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
8	2021	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
9	2022	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	2023	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

Metric Description	Gas Distribution: 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 requirement in 49 CFR Part 192, or the utility's internal standards. Separate metrics are provided for gas distribution and gas transmission.
Units	Percentage of work orders past due for completion in the past calendar year

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 29**  
**GO-95 CORRECTIVE ACTIONS (TIERS 2 AND 3, HFTD)**  
**2014-2023**  
**TRANSMISSION**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015													
3	2016	12.30%	11.06%	2.46%	7.79%	6.55%	8.61%	6.56%	5.33%	10.65%	8.61%	5.74%	8.19%	93.85%
4	2017	5.14%	5.14%	6.54%	17.29%	8.41%	4.21%	7.01%	5.14%	4.20%	7.48%	3.27%	0.47%	74.30%
5	2018	8.44%	25.33%	12.98%	7.80%	3.24%	7.79%	10.39%	18.84%	20.13%	7.14%	3.89%	9.74%	135.71%
6	2019	6.80%	8.40%	9.20%	3.60%	10.40%	14.00%	14.00%	15.20%	20.00%	8.00%	8.00%	8.00%	125.60%
7	2020	9.54%	13.35%	4.09%	5.17%	8.99%	5.18%	5.45%	6.54%	7.90%	14.72%	8.17%	4.09%	93.19%
8	2021	3.52%	18.59%	9.05%	6.03%	4.02%	14.82%	4.00%	8.06%	11.56%	16.08%	1.76%	8.29%	105.78%
9	2022	9.34%	7.53%	9.03%	9.94%	20.18%	4.53%	1.20%	7.53%	5.12%	8.43%	7.53%	4.82%	95.18%
10	2023	7.43%	19.59%	2.03%	10.81%	4.05%	5.41%	11.49%	14.19%	14.86%	16.89%	4.73%	5.41%	116.89%

Metric Description	Transmission System: 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.
Units	Percentage of corrective actions completed

**METRIC 29**  
**GO-95 CORRECTIVE ACTIONS (TIERS 2 AND 3, HFTD)**  
**2014-2023**  
**DISTRIBUTION**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014	51.90%	8.56%	11.97%	8.39%	8.84%	5.25%	3.55%	1.06%	0.37%	0.03%	0.02%	0.00%	99.94%
2	2015	72.50%	10.89%	6.49%	4.46%	2.13%	1.55%	1.38%	0.38%	0.10%	0.03%	0.00%	0.02%	99.93%
3	2016	74.36%	14.40%	3.64%	3.08%	1.97%	1.30%	0.63%	0.33%	0.17%	0.00%	0.00%	0.00%	99.87%
4	2017	61.18%	12.76%	12.60%	6.42%	3.27%	1.38%	1.50%	0.54%	0.16%	0.14%	0.02%	0.02%	99.98%
5	2018	58.68%	10.36%	7.97%	7.58%	5.04%	3.80%	2.62%	2.23%	1.15%	0.42%	0.05%	0.03%	99.95%
6	2019	58.80%	4.64%	8.60%	4.22%	4.74%	4.35%	7.72%	2.84%	2.49%	1.11%	0.33%	0.10%	99.93%
7	2020	55.97%	13.08%	7.35%	6.31%	6.02%	3.46%	2.53%	2.33%	1.20%	1.39%	0.16%	0.19%	100.00%
8	2021	66.75%	7.89%	4.94%	3.18%	2.37%	3.18%	3.92%	3.02%	2.57%	1.83%	0.26%	0.06%	99.97%
9	2022	40.37%	9.36%	11.43%	11.23%	6.75%	5.38%	6.52%	3.21%	2.34%	2.01%	0.67%	0.33%	99.60%
10	2023	36.15%	11.29%	6.16%	7.45%	5.92%	4.56%	3.84%	5.68%	7.13%	6.29%	2.52%	2.24%	99.23%

Metric Description	Distribution System: 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.
Units	Percentage of corrective actions completed



**2023 SAFETY PERFORMANCE METRICS REPORT**

**METRIC 30**

**GAS TRANSMISSION OVERPRESSURE EVENTS**

**2014-2023**

**Number of OP Events**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015													
3	2016													
4	2017	0	0	0	0	1	0	0	0	0	0	0	0	1
5	2018	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
8	2021	0	0	0	0	0	0	0	0	0	0	0	0	0
9	2022	0	0	0	0	0	0	0	0	0	0	0	0	0
10	2023	0	0	0	0	0	0	0	0	0	0	0	0	0

**2022 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 30**  
**GAS DISTRIBUTION OVERPRESSURE EVENTS**  
**2014-2023**  
**Number of OP Events**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015													
3	2016													
4	2017	0	0	0	0	1	0	0	0	0	0	0	0	1
5	2018	0	0	1	0	1	0	0	0	0	0	0	0	2
6	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
8	2021	0	0	0	0	0	0	0	0	0	0	0	0	0
9	2022	0	0	0	0	0	0	0	0	0	0	0	0	0
10	2023	0	0	1	0	0	0	0	0	0	0	0	0	1

Metric Description	CPUC-reportable overpressure events are those that met the conditions specified in GO 112-F, Section 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.
Units	Number of occurrences

**2023 SAFETY PERFORMANCE METRICS REPORT**

**METRIC 31**

**GAS IN-LINE INSPECTIONS MISSED**

**2014-2023**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014	0	0	0	0	0	0	0	0	0	0	0	0	0
2	2015	0	0	0	0	0	0	0	0	0	0	0	0	0
3	2016	0	0	0	0	0	0	0	0	0	0	0	0	0
4	2017	0	0	0	0	0	0	0	0	0	0	0	0	0
5	2018	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
8	2021	0	0	0	0	0	0	0	0	0	0	0	0	0
9	2022	0	0	0	0	0	0	0	0	0	0	0	2	2
10	2023	0	0	0	0	0	0	0	0	0	0	0	3	3

Metric Description	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.
Units	Number of Missed Inspections

**2023 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 32**  
**OVERHEAD CONDUCTOR SAFETY INDEX (ANNUAL)**  
**2014-2023**  
**TRANSMISSION**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015													
3	2016													
4	2017													
5	2018													
6	2019													
7	2020													
8	2021													
9	2022													0.00
10	2023													0.00

**METRIC 32**  
**OVERHEAD CONDUCTOR SAFETY INDEX (ANNUAL)**  
**2014-2023**  
**DISTRIBUTION**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2014													
2	2015													
3	2016													
4	2017													
5	2018													
6	2019													
7	2020													
8	2021													
9	2022													11.77
10	2023													14.56

Metric Description	Overhead Conductor Safety Index is the sum of all annual occurrences on overhead transmission or primary 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.
Units	Number of occurrences per circuit mile per circuit mile