

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Examine
Electric Utility De Energization of Power
Lines in Dangerous Conditions.

R.18-12-005
(Filed December 13, 2018)

**SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
2024 PUBLIC SAFETY POWER SHUTOFF POST-SEASON REPORT**

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March 3, 2025

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In compliance with California Public Utilities Commission Public Safety Power Shutoff (PSPS) Order Instituting Rulemaking Phase 3 Decision (D.) 21-06-034 and PSPS Order Instituting Investigation D.21-06-014, San Diego Gas & Electric Company (SDG&E) hereby submits this Post-season Report (Attachment A hereto) regarding the Public Safety Power Shutoff (PSPS) events that occurred in SDG&E's service territory between January 1, 2024 and December 31, 2024. This report follows the template provided by the Commission's Safety and Enforcement Division (SED).

SDG&E hereby provides the following link to access and download the attachments (Excel workbooks) to its 2024 PSPS Post-season Report: <https://www.sdge.com/wildfire-safety/psps-more-info>.

Respectfully submitted,

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Attachment A

**San Diego Gas & Electric Company
2024 Public Safety Power Shutoff Post-Season Report**

SDG&E 2024 Public Safety Power Shutoff Post-Season Report

Table of Contents

Section I – Background: Overarching Regulation	1
Section II – Amendments to Post-Event Reports.....	1
Section III – Decision-Specified.....	4
Section IV – Safety and Enforcement Division-Specified.....	12
Attachment 1 POSTSR 2A: PSPS Data By Census Tract (Geospatial) (Zipped Geodata File)	1
Attachment 2 POSTSR 2B: PSPS Data By Census Tract (Non-Spatial) (Excel File).....	1
Attachment 3 POSTSR 3: Education and Outreach Costs (Excel File).....	1
Attachment 4 POSTSR 4: Complain Tracking Data (Excel File).....	1

Section I – Background: Overarching Regulation

1. Each electric investor-owned utility must file a comprehensive [prior year] Post-Season Report, no later than March 1 of each year, in R.18-12-005 or its successor proceeding. The report must follow a template provided by SED no later than 60 days after SED posts a [prior year] Post-Season Report template on the Commission’s website. Parties may file comments on these reports within 20 days after they are filed and reply comments within 10 days after the final date to file comments.
2. The [prior year] Post-Season Report must include, but will not be limited to: f. Annual report, as applicable, required by Ordering Paragraph 66 of D.21-06-014.
3. To the extent a required item of information is also required to be included in the electric investor-owned utility’s Wildfire Mitigation Plan, the [prior year] Post-Season Report may refer to the electric investor-owned utility’s Wildfire Mitigation Plan rather than repeat the same information; such reference must specify, at minimum, the page and line number(s) for where the required information is contained within the electric investor-owned utility’s Wildfire Mitigation Plan. In cases where this reference is to data, a summary table of the data shall be provided in the report.

Section II – Amendments to Post-Event Reports

A. Regulatory Requirements

1. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company must provide aggregate data, as identified above [D.21-06-014, Ordering Paragraph (OP) 65], in an annual report, including aggregate data that may not have been available at the time the utility filed the 10-day post-event report and must contact the Commission’s Safety and Enforcement Division if the utility requires additional guidance to ensure adequate reporting on the requirement to provide information on affected customers in the 10-day post-event reports.
2. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) must address, among other things, each element of Resolution ESRB-8 reporting requirements, as clarified herein, in the 10-day post-event reports, including the below [OP 65] and, if no information is available, PG&E, SCE, and SDG&E must respond to these Resolution ESRB-8 reporting requirements by indicating the reason this information is not available.

B. Direction

- 1. Provide any information missing [including, but not limited to the specific topics listed below] from any Post-Event Report for Public Safety Power Shutoffs (PSPS) filed in the previous year by:**
 - a. Identify the date and name of the PSPS.**
 - b. Identify the Section of the Post-Event Report template for which the missing information will be added.**
 - c. Provide the missing information under that heading.**

SDG&E reviewed and has not identified missing information its post-event reports for the November 6-8, 2024 and December 9-11, 2024 PSPS events.

- 2. Community Resource Centers: Provide aggregate data, including aggregate data that may not have been available at the time the utility filed the 10-day post-event report:**
 - a. Address and describe each Community Resource Center during a de-energization event.**

SDG&E reviewed and has not identified missing information related to Community Resource Centers (CRCs) in its post-event reports for the November 6-8, 2024 and December 9-11, 2024 PSPS events. SDG&E activated three CRCs during the November 6-8, 2024 PSPS event, and twelve CRCs during the December 9-11, 2024 PSPS event. Please refer to Table 16 in SDG&E's November 6-8 PSPS post-event report¹ and December 9-11 PSPS post-event report² for details on the CRCs activated during these two events.

- 3. Notification: Provide aggregate data that may not have been available at the time the utility filed the 10-day post-event report:**
 - a. Identify who the utility contacted in the community prior to de-energization and whether the affected areas are classified as High Fire Threat District Tier 1, Tier 2, or Tier 3 (as defined in General Order 95, Rule 21.2-D22);**

Please refer to Table 7 in SDG&E's November 6-8, 2024 and December 9-11, 2024 post-event reports for public safety partners contacted prior to de-energization and High Fire Threat District (HFTD) classification.

- b. Explain why notice could not be provided at least two hours prior to a de-energization, if such notice was not provided.**

November 6-8, 2024 PSPS event:

During the November 6-8, 2024 PSPS event, two critical facilities did not receive the 48-72 hour notification and four critical facilities did not receive the 1-4 hour notification

¹ SDG&E Nov. 6-8, 2024, Post Event Report, page A-37 – A-38.

² SDG&E Dec. 9-11, 2024, Post Event Report, page A-60 – A-63.

that is sent when possible. As described in Section 5.6³ of the post-event report, a technical error was quickly identified by the support team, which impacted an email template for six commercial customers with multiple meters who did not have phone numbers on file with SDG&E. Once this technical issue was identified, SDG&E disabled the supplemental email notification which inadvertently disabled the primary notifications as well. The primary notifications were then re-enabled ensuring all customers received the subsequent notifications. All customers with phone numbers available in their contact preferences were called and texted by SDG&E personnel, leaving 2 critical facility customers not receiving the 48-72 hour notification and 4 critical facility customers not receiving the 1-4 hour notification that is sent when possible.

December 9-11, 2024 PSPS event:

During the December 9-11, 2024 PSPS event, 1,048 customers and 6 critical facilities did not receive notifications because they were not originally in scope for the event. As described in Section 5.6⁴ of the post-event report, SDG&E experienced a rapid onset of widespread, high wind forecasts, necessitating further revisions to the forecasted scope of the event and inclusion of customers who were not forecasted in scope ahead of the Period of Concern. SDG&E's updated de-energization approach included adding transmission infrastructure to the scope of the event, as entire circuits were de-energized due to the extreme conditions, and changes to switching plans. Because de-energization notifications are typically generated at the device level, the expansion of scope to include isolating at the substation breakers resulted in the de-energization of customers originally unanticipated to be included in the device-level scope of the event at the substation level. SDG&E leveraged backup generation where available and procured additional backup generation to reduce the impacts of notification failures where possible. SDG&E has taken steps to enhance communications between SDG&E's Electric Operation Center and the Customer Notification Team to reduce the likelihood of missed notifications in the future. This includes verification of the isolation devices to be used for notifications when there is potential for all transmission lines into a substation to be de-energized.

4. **Restoration: Provide aggregate data, as identified in OP 65, in an annual report, including aggregate data that may not have been available at the time the utility filed the 10-day post-event report:**
 - a. **Provide a detailed description of the steps the utility used to restore power.**

SDG&E has reviewed and has not identified missing information regarding the steps to restore power in its November 6-8, 2024 and December 9-11, 2024 post-event reports.

When a circuit is de-energized, meteorology will add it to the restoration forecast list, and the team will ascertain the date and time when forecasted wind gusts are expected to reach 7mph less than the alert speed and will likely continue to decline. As circuits are de-energized, they are added to the dynamic restoration forecast list. Typically, circuit restoration is prioritized based on the order in which favorable weather conditions will

³ SDG&E Nov. 6-8, 2024, Post Event Report, page A-22 – A-23.

⁴ SDG&E Dec. 9-11, 2024, Post Event Report, page A-43 – A-44.

prevail in each area. Circuit forecasts trending in a favorable manner will garner the prioritization of patrols. Once the patrolling of the lines is complete and SDG&E crews confirm there are no wind-related damages or hazards to SDG&E's overhead facilities, the circuit will be re-energized with crews and contract firefighting resources onsite.

For the December 9-11, 2024 PSPS event, SDG&E was able to utilize resources such as portable backup generators, microgrids, and undergrounded segments to restore power to portions of circuits prior to the conclusion of the weather event, reducing PSPS impacts.

Section III – Decision-Specified

A. Education and Outreach

- 1. Include the results of the most recent education and outreach surveys not yet previously reported on, as an attachment to the Post-Season Report. See D.21-06-034, Sections E-1.1. – E.1.4. for specific requirements on the surveys.**

Due to multiple PSPS events occurring through December and January, SDG&E's Post-Season Survey is currently being fielded at the time of this filing. Results are expected in the coming weeks. SDG&E will provide an overview in the Q1 AFN Quarterly Report (due on April 30, 2025).

B. Medical Baseline and Access and Functional Needs

- 1. Describe in detail all programs and/or types of assistance, including:**
 - a. Free and/or subsidized backup batteries**
 - b. Self-Generation Incentive Program Equity Resiliency Budget**
 - c. Community Microgrid Incentive Program [sic] ["Microgrid Incentive Program" per D.21-01-018]**
 - d. Hotel vouchers**
 - e. Accessible Transportation to CRCs**
 - f. Any other applicable programs or pilots to support resiliency for persons with access and functional needs and vulnerable populations.**

Standby Power Program (SPP)

The SPP, which is an umbrella program that includes several other programs, targets customers and communities that will not directly benefit from other grid hardening programs. The program offers potential backup resiliency benefits specifically to customers that have experienced PSPS in the past and individuals with access and functional needs. The Standby Power Program consists of the Fixed Backup Power (FBP) Program targeting residential customers, FBP Program targeting commercial customers, and the Mobile Home Park Resilience Program (MHRP) which targets mobile home park clubhouses. This program provides clean backup power solutions to enhance resiliency for the customer.

SDG&E 2024 Public Safety Power Shutoff Post-Season Report

SPP was introduced to assist rural customers in the HFTD that may not benefit from near- or long-term traditional hardening initiatives.

Customers are identified based on meter, circuit and PSPS event exposure, and receive outreach letters and communications inviting them to participate. Depending on site requirements, feasibility, and cost, the program can evaluate the potential for backup power solutions to enhance resiliency during PSPS de-energizations including permanent standby generators, permanent backup batteries powered by solar arrays, and related equipment. The program manages site permitting, construction, and final inspection to ensure the equipment is installed properly.

The Generator Grant Program (GGP)

The GGP offers no-cost portable battery units with solar charging capacity, leveraging cleaner, renewable generator options to give vulnerable customers a means to keep small devices and appliances charged and powered during PSPS events. The program focuses on customers residing in the HFTD who have experienced one or more PSPS event and are enrolled in our Medical Baseline Program or flagged in our customer database as self-identified Access and Functional Needs (AFN), having a self-reported disability. Additionally, GGP reserves a quantity of pre-charged backup batteries specifically for expedited delivery during active PSPS events.

The Generator Assistance Program (GAP)

The GAP offers a \$300 rebate on fuel generators and a \$150 rebate on portable power stations to customers who meet the basic eligibility criteria of residing in Tiers 2 or 3 of the HFTD and having experienced one or more PSPS outage(s). CARE/FERA customers meeting these criteria receive an enhanced rebate of \$500 on fuel generators, the equivalent to a 70 to 90 percent discount on the average generator models for lower-income customers, and \$200 on portable power stations. The program provides the option for customers to receive one rebate for a fuel generator and one rebate for a portable power station per household to accommodate various backup power needs.

Self-Generation Incentive Program (SGIP)

The SGIP offers incentives for generation and battery storage technologies for residential and nonresidential customers. The SGIP has a variety of different budget categories for the current program cycle that started in 2020 and is expected to run until the end of 2025 or until all incentive funds are exhausted. In support of AFN customers, the program offers higher incentives for battery storage projects within the Equity Resiliency budget. Customers can be eligible for the Equity Resiliency budget if they are located in a Tier 2 or Tier 3 HFTD, experienced PSPS events, are currently enrolled in a Medical Baseline program, and/or is a customer that has a serious illness or condition that could be life threatening if electricity is disconnected (2024 SGIP Handbook, PG 25-26). This program is administrated by the Center for Sustainable Energy (CSE) in SDG&E's service territory and CSE will administrate SGIP until the end of the current program cycle [2020-2025].

Microgrid Incentive Program (MIP)

The MIP is a \$200 million program, with additional matching funds for certain islanding-related distribution upgrades, as well as funding clean energy community microgrids targeting disadvantaged and vulnerable populations impacted by grid outages. The MIP seeks to advance microgrid resiliency technology, advance system benefits of microgrids equitably across Disadvantaged Vulnerable Communities (DVCs), and inform future regulatory resiliency action to the benefit of all ratepayer customers. Please refer to the Joint IOU Proposed MIP Implementation Plan filed with the CPUC on December 3, 2021 for further details.⁵ A proposed decision (PD) on was issued on February 9, 2023⁶ adopting implementation rules for the MIP and finding that the Joint IOU Proposed Implementation Plan satisfies the requirements of D.21-01-018. The PD also requires that that each investor-owned utility submit a final MIP Handbook via a Tier 1 Advice Letter to the CPUC’s Energy Division. The handbook was released in October, 2023 and is a resource to inform community members and leaders in greater detail about the MIP and community microgrids.

Hotel Stays

SDG&E continues to partner and enhance initiatives with Salvation Army to provide no-cost hotel stays to individuals with AFN, as referred by 211 San Diego and Orange County United Way. These hotel stays are available for the duration of a PSPS, and locations are selected based on accessibility and proximity to a customer’s home or other requested location.

Accessible Transportation

SDG&E continues its partnership with Facilitating Access to Coordinated Transportation (FACT), a local paratransit partner which provides accessible transportation to individuals with AFN and those in need across the entire HFTD experiencing a PSPS. Individuals may use FACT for transportation to CRCs, hotels or other safe locations when referred through 211. FACT is available 7 days a week from 5:30 am-11:00 pm during a PSPS.

Other Applicable Programs

211 San Diego and Orange County United Way

211 San Diego and Orange County United Way serve as resource hubs to connect individuals with AFN to services directly provided by partners contracted with SDG&E, as well as more than 1,000 regional CBOs who provide services. These organizations provide several unique advantages in that they are available statewide 24/7 and connect individuals with well-established local partners who have long served the broader AFN Community. Additionally, the organization’s social workers are equipped to conduct needs assessments and escalate needs accordingly to higher tiers of support. 211 also provides outreach to MBL customers in the high fire threat district. This outreach focuses on opportunities for MBL customers to prepare resiliency plans and connects them with

⁵ <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M428/K469/428469637.PDF>

⁶ <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M502/K200/502200817.PDF>

SDG&E 2024 Public Safety Power Shutoff Post-Season Report

existing programs for enhanced support. Additionally, they provide a holistic approach to assisting customers with completing applications for these programs.

Food Support

SDG&E has strengthened the pipeline of local food resources for seniors, individuals, and families with AFN by partnering with the San Diego Food Bank, Feeding America, Meals on Wheels and other local food partners. These valued partnerships enable the support of vulnerable, rural, and tribal communities year-round and during PSPS activations. Food support is available at many locations, including on tribal lands. Expanded mobile food pantries ensure additional food support offerings during PSPS. As demonstrated during previous PSPS de-energizations, this has proven to be a valuable resource and as such will continue to play an important role in supporting customers in need.

Supplemental to the above referenced partnerships, SDG&E will continue to offer warm meals at Community Resource Centers, when needed. Currently, three catering companies have contracts with SDG&E to provide catering services throughout the service territory.

- 2. Identify and describe the costs and associated funding source(s) for all partnerships, each unique program and form of assistance (e.g., backup batteries as distinct from hotel vouchers), and any other efforts aimed at mitigating the impacts of public safety power shutoff events on persons with access and functional needs and vulnerable populations. Use the below table to provide this information.**

Table 1: 2024 Program Costs

Program	Total Cost	Funding Source	Program/Cost Description
Standby Power Programs	\$2,998,864	WMP	Fixed backup generators or batteries
Generator Grant Program	\$855,697	WMP	No-cost portable power stations (backup batteries)
Generator Assistance Program	\$549,926	WMP	Rebates on portable fuel generators and/or portable power stations (backup batteries)
Self-Generation Incentive Program	\$10,659,874.84 ⁷	SGIP	Programmatic year 2024, incentive spend for all 388 SGIP storage approved paid projects in the SDG&E service territory.
Hotel Stays	\$26,908	Shareholder Funded	No-cost hotel stays offered to customers with AFN. No shareholder funding was provided

⁷Self-Generation Incentive Program 2024 Annual Program Report developed by The Center for Sustainable Energy (CSE) for San Diego Gas & Electric (SDG&E). Total incentive dollar amount paid for all 388 approved SGIP storage projects in the 2024 programmatic year in SDG&E territory provided by CSE, the Program Administrator for SGIP. Figure incorporates costs for all SGIP budget categories, including the Equity Resiliency budget offered to customers with AFN.

SDG&E 2024 Public Safety Power Shutoff Post-Season Report

			to vendor in 2024. Funding was provided to vendor in prior years, resulting in a surplus that was used for hotel stays in 2024.
Accessible Transportation	\$29,662	WMP	No-cost accessible transportation to individuals with AFN and those in need across the entire HFTD experiencing a PSPS
211 San Diego & Orange County United Way (formerly 211 Orange County)	\$479,114	WMP	Serves as resource hub to connect individuals with AFN to services directly provided by partners contracted with SDG&E, as well as more than 1,000 regional CBOs who provide services
Food Support	\$112,000 (Grants provided to Feeding San Diego, Jacobs and Cushman Food Bank, Meals on Wheels, Neighborhood House Association, and San Ysidro Health)	Shareholder Funded	Food support provided, as needed, to communities impacted during PSPS.

3. Funding source(s) shall specify applicable utility balancing accounts or other accounting mechanisms, and non-utility funding sources, if applicable.

For the programs listed above as WMP funded, the applicable memorandum account is WMPMA – Electric. For the SGIP program, the applicable memorandum account is SGIPMA. SDG&E also awards some key AFN organizations with shareholder grants who provide additional PSPS preparedness and support, as indicated in the table above.

4. Identify any communities or areas not served by utility partnerships with CBOs that provide assistance to persons with access and functional needs or vulnerable populations in preparation for or during a public safety partners event.

All communities in SDG&E’s service territory are served by utility partnerships that provide assistance for individuals with access and functional needs or vulnerable populations in preparation for or during a public safety power shutoff.

C. Mitigation

1. For each proactive de-energization event that occurred during the prior calendar year:
 - a. Circuit-by-circuit analysis of mitigation provided from backup power and microgrid pilots.

November 6-8, 2024 PSPS event:

No microgrids were deployed during this event.

Circuit	Customers Mitigated by Backup Generators
79	8
441	17
445	2
1215	26

December 9-11, 2024 PSPS event:

Circuit	Customers Mitigated by Backup Generators	Customers Mitigated by Microgrids
67	1	
79	14	
157	3	
171	4	
176	1	
212	1	
214	1	
217	1	
220	1	
221	156	338
222	608	
235	1	
236	173	
237	274	
239	34	
286	1	
288	1	
355	1	
356	1	

SDG&E 2024 Public Safety Power Shutoff Post-Season Report

441	16	
442	1	
445	3	
448	0	13
449	1	
450	1	
542	1	
576	1	
908	1	
970	3	
972	2	2
975	2	
1039	1	
1215	26	
1233	88	
RB1	11	

D. Public Safety Partners

- 1. Identification of all requests for selective re-energization made by public safety partners during a de-energization event, whether each such request was granted or denied, and the reason for granting or denying each such request.**

SDG&E did not receive any requests for selective re-energization by public safety partners during its November 6-8, 2024 and December 9-11, 2024 PSPS events.

E. Transmission

- 1. Description of the impact of de-energization on transmission.**

November 6-8, 2024 PSPS event:

Not applicable. SDG&E did not de-energize transmission lines during the November 6-8, 2024 PSPS event.

December 9-11, 2024 PSPS event:

During the December 9-11, 2024 PSPS event, ten (10) transmission lines were de-energized. Due to the rapid onset of widespread, high wind forecasts, de-energizations took place at the circuit level for multiple circuits in the HFTD. The utilization of circuit level de-energization included circuits out of substations where all incoming transmission lines to that substation were de-energized. For transmission lines that may have an impact to the Bulk Electric System (BES), SDG&E coordinated directly with CAISO to evaluate potential impacts.

2. Evaluation of how to mitigate and prepare for those impacts in future potential de-energization events.

Currently SDG&E prepares for transmission impacts by studying the impact of de-energizing forecasted impacted lines 72 hours in advance of an event. In addition, there are specific non-BES transmission lines that are studied and documented that have no impact on the Bulk Electric System (BES). As the forecast is updated, SDG&E continues to study the impact of transmission lines at risk of PSPS. Planned work is adjusted in accordance with potential fire risk. This coordination is done with SDG&E's Balancing Authority, the California Independent System Operator (CAISO), to ensure the grid is set up for reliable operation of the transmission system. All transmission lines with forecasted impacts are patrolled, cleared of close vegetation, checked for compliance issues, and assessed for structural usage/pole loading prior to an event.

3. Identify and describe all studies that are part of such analysis and evaluation.

Studies can be broken down into two areas for transmission: Bulk Electric System (BES) Reliability and transmission line integrity. BES Reliability studies make sure that if forecasted impacted lines are de-energized, there are no issues for the other transmission lines on the system and system stability can be maintained. Transmission line integrity studies determine the health of components on the transmission line to decide what wind speeds or loading is acceptable for that line to safely handle to inform decision making for de-energization of those lines.

4. Identify all efforts to work with publicly owned utilities and cooperatives to evaluate the impacts of de-energization on transmission.

SDG&E works with the California Independent System Operator (CAISO) and neighboring publicly owned utilities ahead of the event to coordinate if there is potential impact to transmission lines identified as having risk of PSPS. Upon determining which lines may be de-energized, SDG&E in coordination with the CAISO determines if the neighboring utility may have an impact on SDG&E's BES Reliability or if SDG&E will have an impact on the neighboring utility.

November 6-8, 2024 PSPS event:

SDG&E did not need to coordinate with any neighboring utilities since it did not de-energize transmission lines during the November 6-8, 2024 PSPS event.

December 9-11, 2024 PSPS event:

During the December 9-11, 2024 PSPS event, transmission lines that may have an impact to the Bulk Electric System (BES) were coordinated directly with CAISO prior to de-energizing, to ensure there would be no impacts on BES Reliability or neighboring utilities.

Section IV – Safety and Enforcement Division-Specified

- 1. Discuss how your PSPS meteorology and fire science predictive models performed in prior year. What changes were made to the models in prior year? What are the planned modeling improvement efforts?**

SDG&E’s Meteorology and Fire Science predictive models performed well overall in 2024, and SDG&E continues to strive for improvement as technology and science evolves. During the year, six new high-resolution weather forecast simulations were established, creating forecasts that extended as far out as 10 days that allow insight into the primary variables used to predict fire weather events, including temperature, humidity, winds, and fuel moistures. Of these models, four were created at 2.5 kilometer resolution, and two were created at 600 meter resolution to provide a range of solution details. In 2025, SDG&E plans to create a forecast model ensemble of 80 members to allow for a more probabilistic approach to fire weather forecasting that better quantifies uncertainties in the forecast. This ensemble will provide a seven-day outlook into all variables currently included in SDG&E weather forecast models.

- 2. What were the challenges in quantifying risks and benefits in terms of determining the scope (size and duration) of the PSPS you conducted?**

November 6-8, 2024 PSPS event:

The primary challenge in determining the scope of this event was the inherent uncertainty in weather forecast models, which led to significant changes to the scope as the event neared. At 72 hours ahead of the predicted onset of the winds, forecast models showed the potential for eight circuit segments to be in scope for the event. However, subsequent forecast model runs strengthened their projections of the wind, which ultimately increased the overall scope to 39 distribution circuits as the event began.

December 9-11, 2024 PSPS event:

As in the November 2024 PSPS event, the primary challenge in determining the scope related to the inherent uncertainty in weather forecast models. Between the 72-hour and 24-hour ahead timeframes, predictions in the forecast wind gusts strengthened and became slightly more widespread, resulting in the addition of four circuits to the overall scope of the event in the day leading up to the winds.

- 3. Explain mitigations conducted for each PSPS event in the year, including but not limited to fast trip activations, circuit switching and sectionalization, and microgrid activations.**

SDG&E interprets “fast trip” to be synonymous with Sensitive Relay Profile (SRP) settings. While both PSPS and SRP programs are effective wildfire mitigation tools, they operate independently with separate implementation criteria and cost/benefit analysis, and therefore should not be viewed as alternatives to each other.

SDG&E 2024 Public Safety Power Shutoff Post-Season Report

SDG&E remotely enables SRP on its system when high-risk fire weather is present. This includes when the Fire Potential Index (FPI) is Elevated or Extreme, when a Red Flag Warning (RFW) is issued, or when a PSPS event is forecasted. Additionally, SRP is enabled only in the regions experiencing the high-risk weather. The SRP settings make protective devices more sensitive to faults on the electric system and allow the devices to activate quickly to de-energize upon system identification of an infrastructure anomaly or damage to reduce ignition risk. These settings merely augment the parameters used in these devices to operate at faster speeds. Outages triggered by SRP settings are no different than unplanned outages, which are unpredictable due to their dependence on external events outside of SDG&E's control, and do not allow time to warn customers in advance. Thus,, the communication plan for SRP triggered outages is the same as unplanned outages.

Conversely PSPS outages are proactive power shut offs to mitigate catastrophic wildfire risk due to known forecasted extreme weather conditions, which allows for a period of advanced notification to customers and stakeholders and mobilization of customer support resources.

November 6-8, 2024 PSPS event:

See Section 10⁸ of the November 6-8, 2024 PSPS Post-Event Report for explanations of mitigations conducted.

December 9-11, 2024 PSPS event:

See Section 10⁹ of the December 9-11, 2024 PSPS Post-Event Report for explanations of mitigations conducted.

4. Explain how you fully incorporated public safety partners in your exercise planning. How many were invited to, and attended each planning meeting? Describe your communication efforts-dates and methods-to solicit participation.

To best incorporate Public Safety Partners in exercise planning, SDG&E referred to the CPUC's guidance on Public Safety Partner qualifications. SDG&E then used the company-compiled list of Public Safety Partners (over 1,000 partners) and invited them to complete a survey requesting partners to share their interest in planning, playing, observing, or supporting the exercises in other ways. SDG&E received survey responses from 81 representatives, which were tracked for follow-ups with partners based on the indicated level of participation. SDG&E encouraged all partners to identify additional parties to include and supported additional staff outreach with known stakeholders at local events and small group outreach such as jurisdictional networking and partner exercises. These partners were then included in the Initial Planning Meeting/Concepts and Objectives Meeting (partner attendance: 10), the Midterm Planning and MSEL Review Meeting (partner attendance: 7), and the Final Planning Meeting (partner attendance: 5). For each meeting, SDG&E communicated the meeting details ahead of time, shared a read-ahead, one page document when possible, and followed up with the meeting slides and notes after each session. When

⁸ SDG&E Nov. 6-8, 2024, Post Event Report, page A-39 – A-49.

⁹ SDG&E Dec. 9-11, 2024, Post Event Report, page A-64 – A-70.

stakeholders requested more information, SDG&E followed up with additional small-group meetings to answer questions and provide additional exercise support. SDG&E ultimately had 88 participants in the tabletop exercise and 253 participants in the functional exercise.

5. Recap the lessons learned from all of your de-energization exercises, the resulting action items, their implementation, and observed consequences.

Table 2: 2024 Lessons Learned from De-energization Exercises

De-energization Exercise	Action Items	Implementation	Consequences
PSPS TTX	Telcom Public Safety Partners needed additional engagement to confirm current PSPS notification expectations	Completed	SDG&E did additional outreach and expanded the discussion topics for the TTX to cover expressed questions and needed feedback on partner PSPS processes.
PSPS FE	Responders participated in a new EOC space with new technology and systems.	Ongoing	Training was provided to appropriate personnel and additional training was provided prior to the 2024 peak season.
PSPS FE	The current legacy process of conducting a State Executive Briefing is inefficient and duplicates data provided via real-time systems like the Partner Portal.	Ongoing	SDG&E will continue to work with other investor-owned utilities and coordinate with CalOES to determine if current legacy reporting procedures can be updated to better reflect current tools and systems

6. Discuss how you fully implemented the whole community approach into your de-energization exercises.

In addition to upholding regulatory requirements, industry standards, and internal goals of excellence, SDG&E strives to involve and consider the whole community in the development of preparedness plans and procedures. SDG&E works hard to ensure that the roles and responsibilities of Public Safety Partners and consumers are reflected in the guidance and response materials. To do this, SDG&E:

- Works closely with both internal and external AFN partners and departments.

SDG&E 2024 Public Safety Power Shutoff Post-Season Report

- AFN plans and staff are consulted at every step of exercise and response development. Regular discussions are held throughout the year with SDG&E's AFN department to ensure full compliance with and support of AFN requirements and best practices.
- Monthly touchpoints with key AFN Support Partners are held to communicate procedural changes and innovate adjustments to service delivery to improve efficiency and customer experience
- Through a pre-season PSPS Support Partner conference to address procedural questions collaboratively
- Hosting AFN Partners at tabletop exercises to test procedures and adjust, as needed
- Plans and executes exercises:
 - Through invitations to designated Public Safety Partners and PSPS AFN support partners to be part of the planning, observing, and playing in exercises.
 - Through outreach to additional Public Safety Partner groups and organizations to be part of the planning, observing, and playing in exercises.
 - Through targeted and meaningful injects that directly addressed partners' concerns and wants for their goals in the exercise, (e.g., including a specific clinic within a PSPS exercise scenario territory so that the partner could fully practice their response procedures).
 - Through careful review of After-Action Reports, lessons learned, and feedback from partners in formal and informal data collection.
 - Through position-specific exercises based off of lessons learned through feedback received by AFN Support Partners and CBO General Partners

Attendance at SDG&E's PSPS exercises included representatives from local jurisdictions, police and fire agencies, tribal representatives, non-profit organizations, and telecommunications companies.

7. Discuss the complaints you received (as documented in POSTSR4) and any lessons learned and implementation of changed business practices.

Some users have expressed concerns about the volume of emails and notifications sent from the Partner Portal during events, describing them as excessive diminishing their effectiveness. To address these concerns, public safety partners are encouraged to visit the training section of our Partner Portal app or website. This section provides detailed instructions on how to customize notification settings, allowing users to select notifications relevant only to their specific jurisdiction. By doing so, public safety partners can avoid being overwhelmed by unnecessary notifications and help ensure that important messages are received.

Customer Success complaints were primarily focused on receiving too many notifications and that the information in the notifications seemed inconsistent. Some notifications contained account-specific information and some notifications did not. Customers also felt inundated by the high volume of notifications they received. SDG&E is working with customers to update the way SDG&E sends notifications during PSPS events to ensure a smoother experience for customers with numerous meters in scope of a PSPS. Additionally,

SDG&E 2024 Public Safety Power Shutoff Post-Season Report

SDG&E received feedback from customers and partners regarding the twice daily situational awareness briefing calls. SDG&E received feedback that these calls did not provide enough value or enough of an opportunity to gain valuable information that would help them make critical operational decisions. SDG&E has since restructured these calls to provide more valuable situational awareness updates and an interactive question and answer session. The restructured format was used for 2025 PSPS events.

Social-media channels also reported multiple complaints during the December 9-11 PSPS event. Most expressed general dissatisfaction about the PSPS as well as the duration. A lot of comments were tied to there being no winds in the vicinity of the person who left comment.

One customer expressed concern for their neighbors who were predominantly older adults and reliant on medical equipment. The customer was concerned about the amount of advanced notice the neighbors were given before de-energization, and the amount of time the outage could last. SDG&E responded to the customer inquiry by informing them that power will be turned off as a last resort, and will remain out as long as high winds pose a safety threat to the community. SDG&E informed the customer that the neighboring community who was impacted was notified at least 48 hours in advance of the outage. Finally, SDG&E provided resources to the customer for the Medical Baseline program, and reassured the customer that SDG&E proactively reaches out to all medical baseline customers to make sure they are prepared in the event power is shut off.

SDG&E call center complaints were primarily focused on general dissatisfaction with de-energizations. Comments included concerns with mild localized weather conditions, inability to use medical devices and water systems as well as potential food spoilage. Fewer than 10 customers expressed concern with communications. One customer commented that communications were not efficient, another customer commented they had not received any communication. Their information was shared accordingly for investigation.

SDG&E utilizes annual customer feedback to improve communications (including notification language) for the following year. The social media feedback gathered will also be used to improve communications for 2025. Additional feedback is gathered by the Post-Season Research (online and phone). Due to multiple Public Safety Power Shutoff occurrences in November, December and January, SDG&E's Post-Season Survey is currently being fielded. Results are expected in the coming weeks and SDG&E will provide an overview in the Q1 AFN Quarterly Report (due on April 30, 2025).

8. How did your PSPS notifications, to both customers and public safety partners/local governments, perform over the year? What changes will you make to improve performance?

The Partner Portal mobile application has the capability to deliver push notifications that are supplementary to SDG&E email notifications. In 2024, the Partner Portal delivered push notifications to all Public Safety Partners who subscribed to receive them. Throughout the course of the season, PSPS related push notifications were successfully drafted, sent, and delivered to mobile app users during each event. The Portal followed the regulatory required notification cadence by sending push notifications after each email notification was sent to

SDG&E 2024 Public Safety Power Shutoff Post-Season Report

ensure that event information reached Portal users quickly. SDG&E will be updating the Portal push notification system by adding notification templates directly into the system to increase the efficiency of sending push notifications and ensuring consistency in messaging between operational periods and events.

As part of SDG&E's ongoing continuous improvement efforts, a new customer notification system was implemented in 2024, which was leveraged for the first time during the November 6 – November 8 A-23 PSPS event. Overall, this was a successful launch for the new system. Some lessons learned included an instance during the activation, where a technical error was quickly identified by the support team, which impacted an email template for six commercial customers with multiple meters who did not have phone numbers on file with SDG&E. Once this technical issue was identified, SDG&E disabled the supplemental email notification which inadvertently disabled the primary notifications as well. The primary notifications were then re-enabled ensuring all customers received the subsequent notifications. All customers with phone numbers available in their contact preferences were called and texted by SDG&E personnel, leaving 2 critical facility customers not receiving the 48-72 hour notification and 4 critical facility customers not receiving the 1-4 hour notification that is sent when possible.

SDG&E leveraged its new Customer Notification System for a second time in December. This event had unique challenges. SDG&E experienced a rapid onset of widespread, high wind forecasts, necessitating further revisions to the forecasted scope of the event and inclusion of customers who were not forecasted in scope ahead of the Period of Concern. SDG&E's updated de-energization approach included adding transmission infrastructure to the scope of the event, as entire circuits were de-energized due to the extreme conditions, and changes to switching plans. Because de-energization notifications are typically generated at the device level, the expansion of scope to include isolating the device at the substation breakers resulted in the de-energization of customers originally unanticipated to be included in the device-level scope of the event at the substation level. Of the 1,048 customers who did not receive notifications because they were not originally in scope of the event, 102 were Medical Baseline customers and 6 were CFI. SDG&E leveraged backup generation where available and procured additional backup generation to reduce the impacts of notification failures where possible.

Going forward, SDG&E will work to determine and communicate changes to switching plans in advance of the customer notification process. SDG&E has taken steps to enhance communications between SDG&E's Electric Operation Center and the Customer Notification Team to reduce the likelihood of missed notifications in the future. This includes verification of the isolation devices to be used for notifications when there is potential for all transmission lines into a substation to be de-energized.

Additionally, a new customer notification (M9a) was created during the November PSPS occurrence. Due to the dynamic nature of the weather event, the new notification informed customers that their power would remain out overnight. The notification was added to the new CNS system accordingly (email, voice and text).

SDG&E utilizes annual customer feedback to improve communications (including notification language) for the following year. This feedback is gathered by the Post-Season

Research (online and phone). Due to multiple Public Safety Power Shutoff occurrences in November, December and January, SDG&E's Post-Season Survey is currently being fielded. Results are expected in the coming weeks and SDG&E will provide an overview in the Q1 AFN Quarterly Report (due on April 30, 2025).

9. Describe feedback received from CBOs and customers on CRC performance last year. How was the feedback collected and how is feedback being incorporated into future CRC plans?

Customer feedback is typically gathered through the SDG&E Liaison team and the contractor, Southwest Strategies, who staffs the CRCs. Additionally, feedback is collected through direct communication from constituents to local government offices and then forwarded to SDG&E.

The feedback received from customers regarding the Community Resource Centers (CRCs) performance last year highlights some opportunities for enhancement. Some customers mentioned that the support provided by SDG&E during PSPS could be improved, noting that the resource centers were distributing supplies such as chips and water, which they felt could be more substantial. As described in past reports, CRC's provide much more than just water and chips.

Customer feedback is typically gathered through the SDG&E Liaison team and the contractor, Southwest Strategies, who staffs the CRCs. Additionally, feedback is collected through direct communication from constituents to local government offices and then forwarded to SDG&E.

In December, feedback indicated that there were opportunities to increase the availability of resources and warming items at the CRCs. As a result, during the January events, SDG&E took this feedback into account and made adjustments to the resources provided at the CRCs to better meet the needs of affected residents.

To address these concerns and improve future CRC plans, SDG&E plans to improve support services by expanding the range of supplies and services offered at CRC's that will better meet the needs of residents. Additionally, SDG&E will regularly engage with the community to solicit feedback from customers and community-based organizations (CBOs) regarding needs and expectations. These steps will help SDG&E improve the effectiveness of their CRCs and ensure they provide more comprehensive support during a PSPS.

Attachment 1

Attachment 1

**POSTSR 2A: PSPS Data By Census Tract (Geospatial)
(Zipped Geodata File)**

Attachment 2

Attachment 2

**POSTSR 2B: PSPS Data By Census Tract (Non-Spatial)
(Excel File)**

Attachment 3

Attachment 3

**POSTSR 3: Education and Outreach Costs
(Excel File)**

Attachment 4

Attachment 4

**POSTSR 4: Complaint Tracking Data
(Excel File)**