

**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>

**2024 SAFETY PERFORMANCE METRICS REPORT OF  
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)**

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April 1, 2025

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**2024 SAFETY PERFORMANCE METRICS REPORT OF  
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In compliance with Decision (D.) 19-04-020, Safety Model Assessment Proceeding Phase Two Decision Adopting Risk Spending Accountability Report Requirements and Safety Performance Metrics For Investor-Owned Utilities and Adopting a Safety Model Approach for Small and Multi-Jurisdictional Utilities (S-MAP Phase Two Decision) and D.21-11-009, Decision Addressing Phase I, Track 1 And 2 Issues (Risk OIR Phase One Decision), San Diego Gas & Electric Company (SDG&E or Company) timely submits its annual Safety Performance

Metrics Report (2024 SPMR).<sup>1</sup> This 2024 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) 2024 GRC and the 2021 Southern California Gas Company and SDG&E RAMP filing; and a high-level summary of the preliminary total risk mitigation spend. Attachment "A" constitutes the 2024 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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April 1, 2025

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<sup>1</sup> In compliance with D.21-11-009, the Risk OIR Phase One Decision, this 2024 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 RAMP and GRC proceedings.

## **Attachment A**

### **SDG&E 2024 SPMR Report**



# **2024 Safety Performance Metrics Report**

**April 1, 2025**

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# 2024 Safety Performance Metrics Report

## April 1, 2025

### I. INTRODUCTION/OVERVIEW

San Diego Gas & 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 original SPMs, removed certain 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

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<sup>1</sup> In compliance with D.21-11-009, Ordering Paragraph (OP) 9 at 145, this 2024 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 Safety Performance Metric report to [RASA\\_Email@cpuc.ca.gov](mailto:RASA_Email@cpuc.ca.gov).

Decision.<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, 2015 through December 31, 2024, 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 to 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 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 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 identify and mitigate 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:

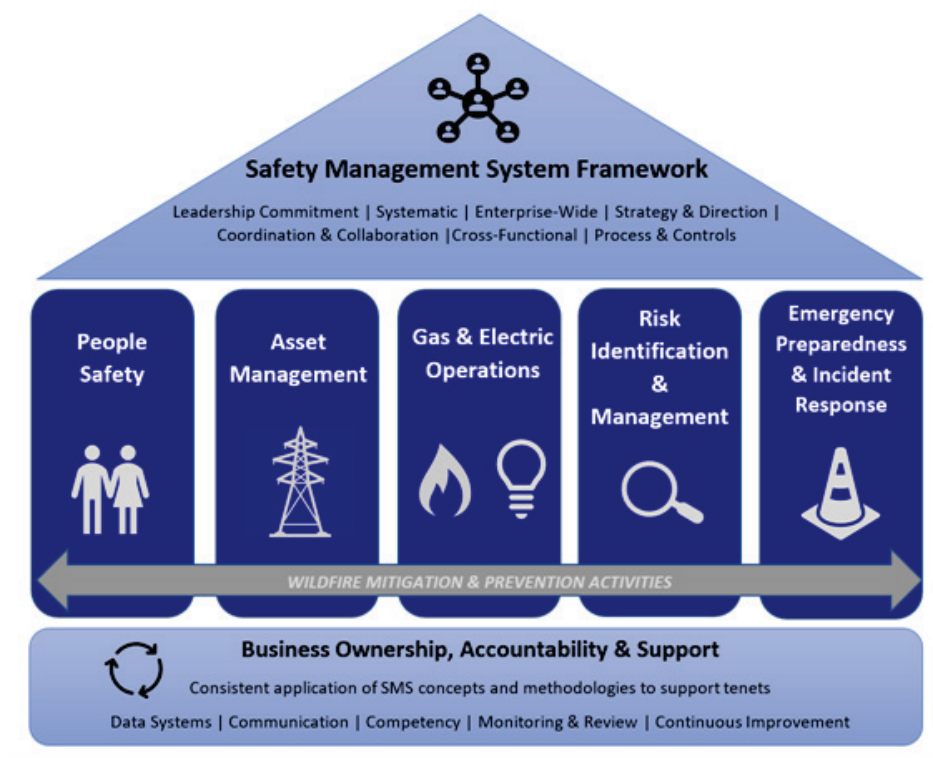
- Greater communication, broad sharing of information, and utilization of lessons learned;
- Enhanced documentation in the form of standardized processes and widely accessible document and data repositories;
- Strengthened employee feedback mechanisms, including additional means and resources for consistent 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, and/or the data required by the new or modified metric had not previously been collected in the manner required by the new or modified metric. 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 and served annually.<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 30, 2025. After review of SDG&E’s draft Pub-SIF data, SPD informed SDG&E on March 5, 2025, that there were no changes to the Pub-SIF subcategories for final reporting in this Safety Performance Metrics Report.<sup>8</sup>

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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.

<sup>8</sup> E-mail from Anwar Safvi, SPD staff, to SDG&E representative (March 5, 2025).

## 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>9</sup>*

Category	Risk(s)	Metric Name	Units	2024
Electric	Wildfire; Transmission Overhead Conductor; Distribution Overhead Conductor Primary	1. Transmission & Distribution (T&D) Overhead Wires Down <sup>10</sup>	Number of wires down events	84
	Wildfire; Transmission Overhead Conductor; Distribution Overhead Conductor Primary	2. Transmission & Distribution (T&D) Overhead Wires Down - Major Event Days <sup>11</sup>	Number of wires down events	286
	Wildfire; Overhead		Average time in minutes	49.05

<sup>9</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>10</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>11</sup> Metric No. 2 tracks the number of wires down events including secondary distribution wires and “Major Event Days” (whereas Metric No. 1 tracks only primary wires down events and excludes secondary wire events and “Major Event Days”).

Category	Risk(s)	Metric Name	Units	2024
	Conductor; Public Safety; Worker Safety	3. Electric Emergency Response	Median time in minutes	34.53
	Overhead Conductor; Wildfire Public Safety; Worker Safety; Catastrophic Event Preparedness	4. Fire Ignitions	Number of ignitions	31
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 3 <sup>rd</sup> party gas dig-ins per 1,000 USA tags/tickets	1.10
	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>12</sup>	5.5 3%
	Catastrophic Damage Involving High-Pressure Pipeline Failure	7. Gas In-Line Inspection Upgrade	Miles of gas transmission lines upgraded annually to permit inline inspections	5.5
	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 Distribution Mains	399.25
	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	90.50

<sup>12</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	2024
			for Distribution Services	
	Catastrophic Damage Involving Medium Pressure Pipeline Failure	10. Cross Bore Intrusions <sup>13</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	28.10 25.90
	Catastrophic Damage Involving High-Pressure Pipeline Failure	13. Gas Pipelines That Can Be Internally Inspected <sup>14</sup>	[Total Miles] Percentage	[162.5] 74%
Injuries	Employee Safety	14. Employee Days Away, Restricted and Transfer (DART) Rate	DART Cases times 200,000 divided by employee hours worked	0.80
	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	0.02
	Contractor Safety	16. Rate of SIF Actual (Contractor)	Number of SIF-Actual cases among contractors x 200,000/contractor hours worked	0.11

<sup>13</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>14</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	2024
	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/contract or hours worked	0.11
	Contractor Safety	19. Contractor Days Away, Restricted Transfer (DART)	DART Cases times 200,000 divided by contractor hours worked.	0.63
Injuries	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”) per 100,000 flight hours	0
Electric	Electric Overhead, wildfire	25. Wires Down not resulting in Automatic De-energization	Percentage of wires down occurrences	32.14%
Electric	Electric Overhead, wildfire	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%
Electric	Electric Overhead, wildfire	27. Overhead Conductor Size in High Fire Threat District (Tiers	Percentage relative to total circuit miles	7.46%

Category	Risk(s)	Metric Name	Units	2024
		2 and 3, HFTD)		
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% / 0%
Electric	Electric safety and Wildfire	29. GO-95 Corrective Actions (Tiers 2 and 3, HFTD)	Percentage of corrective actions completed [Transmission/Distribution]	99.50% / 99.69%
Gas	Gas Transmission and Distribution	30. Gas Overpressure Events	Number of occurrences [Transmission/Distribution]	0/0
	Gas Transmission	31. Gas In-Line Inspections Missed	Number of Missed Inspections	0
Electric	Wildfire Transmission Overhead Conductor Distribution Overhead Conductor Primary	32. Overhead Conductor Safety Index	Number of occurrences per circuit mile [Transmission/Distribution]	0.00/10.08 <sup>15</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>16</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

<sup>15</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>16</sup> D.19-04-020 at 28.

training courses consistently for decades. SDG&E strives to continually advance and sustain its 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 identify and mitigate 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.

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>17</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>18</sup>

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>19</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>20</sup> As such, SDG&E created an enterprise-wide SMS to drive continuous and sustainable 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:

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<sup>17</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>18</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).

<sup>19</sup> *Id.*

<sup>20</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), Ex. SCG-02-R/SDGE-02-R (Day Revised Direct) at DD-28.

### **Example 1: “My Voice” Surveys – Soliciting and Utilizing Employee Feedback to Identify Opportunities for Improvement (Metrics #1-21 and 25-32)**

In July 2024, SDG&E introduced a new employee feedback program to identify opportunities for continuous improvement. Understanding sentiment throughout an employee’s career journey is critical to learning where there may be opportunities to improve and create strategies for improvement. To further our listening efforts, the People & Culture team has launched “My Voice” to measure employee sentiment at different key points in their career with SDG&E. Any new employee who joins SDG&E or existing employee who starts a new position, as well as their hiring manager, will receive a “My Voice” survey 14 days and six months after their start date. Employees resigning or retiring from SDG&E will also receive an exit survey as they depart the company. The surveys include:

- 14 Days After Start Date: Newly hired employees and their hiring manager will receive a survey to provide feedback on the hiring process, onboarding process, and early job/company impressions.
- Six Months After Start Date: Newly hired employees will receive a survey on how they’re acclimating to the new role, team and organization; Their hiring manager will receive a survey to provide feedback on how their direct report is progressing.
- Exit Survey: After providing written notice to resign or retire, employees will receive a survey to provide feedback on reasons for leaving and sentiment about the company. Their direct supervisor will receive a survey to provide their insights on the employee’s departure.

SDG&E’s People & Culture team will use this feedback to inform process improvements, identify training needs, and evolve organizational culture, with the goal of enhancing the employee experience, improving retention and overall company culture.

## Example 2: Employee Engagement Survey Commitments (Metrics #14, 15, and 17)

In 2023, SDG&E launched a new and modernized Employee Engagement Survey in partnership with Gallup. With 82% of employees submitting responses, the results provided insights that allowed SDG&E to create action plans and drive meaningful change. The 2023 Employee Engagement Survey conveyed that, overall, employees are satisfied with SDG&E as a place to work and employees feel a sense of belonging and respect at SDG&E. Feedback showed that there are also opportunities to improve in some key areas, namely building connections, recognition, and leveraging the strengths of team members. SDG&E reviewed survey results to develop its 2024 Engagement Commitments of Connection, Recognition, and Development.

- **Connection:** One identified area of opportunity involves facilitating stronger relationships between colleagues and building deeper connections to Company culture. In 2024, SDG&E announced a high-density schedule with three in-office days per week, which is one of the key strategies to build opportunities for increased connection. In 2024, SDG&E also hosted employee events such as cultural heritage celebrations, the Gas & Electric Rodeo, Wellness Fair, and new opportunities that will allow employees to connect with colleagues outside of their departments.
- **Recognition:** Another identified area of opportunity is to strengthen timely recognition and feedback. In 2024, SDG&E announced a new People Developer Award to recognize employees who are making a difference by developing those around them. Additionally, in 2024, SDG&E instituted “Thank You Thursdays” where leaders are encouraged to take time once a week to recognize skills, efforts, and contributions of individual or multiple team members.
- **Development:** A third area of identified improvements is building upon the strengths of each employee. The Company created opportunities to recognize employees who

are demonstrating strong skillsets and provide growth opportunities that leverage those skills. This includes group coaching and skills sessions. To help further develop the individual strengths of our workforce, directors at SDG&E started holding mentoring sessions with small groups of employees based on their development interests and goals.

### **Example 3: Quarterly & Annual Contractor Safety Summits (Metrics #16, 19, 20)**

In 2024, SDG&E held its 11<sup>th</sup> Annual Contractor Safety Summit. These summits bring together key representatives and leadership of contracted entities that perform work alongside and on behalf of SDG&E. In addition to its annual summit, SDG&E hosts Quarterly Contractor Safety Summits where SDG&E and its contractor partners share safety messaging, best practices and lessons learned. In 2024, SDG&E enhanced its Contractor Safety Summits by incorporating its Safety Management System and safety culture objectives as a standing agenda topic.

During these summits, SDG&E leadership, including its Chief Safety Officer, Chief Risk Officer and Vice President (VP) Electric Engineering and Construction, emphasized the importance of fostering and sustaining a strong culture of safety. At the Q3 summit, SDG&E facilitated a panel discussion with SDG&E and contractor leaders on efforts to advance their respective safety cultures. This enhancement to SDG&E's Contractor Safety Summits underscores the importance of safety culture and fosters a shared understanding of safety culture expectations.

### **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. Every day, SDG&E makes risk-informed decisions by leveraging data, technology, and input from subject matter experts company-wide. 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: Field Safety Engagements (Metrics #14 and 17)**

SDG&E's Days Away, Restricted or Transferred (DART) rate has shown a general reduction over the past 10 years. In 2024, SDG&E experienced an 8% decrease in its DART case rate compared with the value at year-end 2023. 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. While SDG&E continues to reduce employee injuries, Serious Injury and Fatality (SIF) Potential remains relatively flat since SDG&E began collecting data in 2021.

To proactively identify and mitigate SIF Potential incidents, SDG&E introduced Field Safety Engagements as a new measurable metric in 2024. Field Safety Engagements are job observations that incorporate High Energy Control Assessments (HECA) and involve an assessment of activities where high-energy hazards<sup>21</sup> are present to ensure the appropriate direct controls are in place to reduce or eliminate exposure and mitigate the risk of an employee safety event. Where high-energy hazards are present, outputs from SDG&E's Field Safety Engagements assess whether adequate controls are present or whether there is opportunity to deploy additional safety measures. For example, a Field Safety Observation performed of employees working in a roadside excavation could identify third-party vehicle traffic as a high-energy hazard and assess whether the controls such as signage and cones are adequate to prevent serious injury or fatalities to our workforce.

### **Example 2: Kearny's Cal/OSHA Voluntary Protection Program Journey (Metric #14, 15, 16, 17, 18, 19, and 20)**

In November 2024, SDG&E's Kearny Transmission and Substation Operations facility (Kearny) became the first electrical utility substation operation to achieve the Cal/OSHA Voluntary Protection Program (VPP) REACH status. REACH is a program that recognizes companies working toward "Star" status, the highest level of VPP certification. SDG&E commenced its

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<sup>21</sup> High Energy Hazards include gravity (*e.g.*, suspended load), mechanical (*e.g.*, heavy equipment), pressure (*e.g.*, explosion), electrical (*e.g.*, arc flash), and ground disturbance (*e.g.*, excavation or trench).

Kearny VPP journey approximately five years ago in an effort to continuously improve safety to prevent future serious injuries and fatalities.

Cal/OSHA's VPP recognizes employers and employees who have implemented exemplary safety and health programs at their location. VPP goes beyond OSHA standards, focused on honoring those organizations who are fostering a culture of proactive safety and continuous improvement. The program consists of 17 elements, including leadership, contractor safety management, and emergency preparedness. Kearny attributes its safety success to its intensive focus on identifying gaps, educating personnel, and continuously enhancing safety practices.

Kearny's journey started with building a culture of trust and establishing processes to promote a strong culture of safety. For example, Kearny implemented a hazard identification program where employees can submit information for tracking and follow-up. Within SDG&E's overarching Safety Management System, Kearny leverages leading indicators and takes a proactive and preventive approach to risk identification and mitigation. As part of its continuous improvement framework, Kearny will strive for Cal/OSHA VPP Star certification.

### **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. Asset 360 continues to build and enhance per-asset health models for critical asset types to better assess an asset's performance, health, and the impact when such assets fail. Critical assets are determined and prioritized by experts within the operating units. The asset health models support efforts to mitigate occurrences of events captured by the Safety Performance Metrics by way of supporting risk-informed inspection prioritization and proactive replacement of assets based on identified potential risk. The program continues to expand and incorporate new asset health models and will assist with providing refined insights for risk-informed decision making. For example, the models developed for the Risk-Informed Drone Inspection

(RIDI) Program continue to be refined and results from previous years are used to enhance the models. These asset-level risk prioritization models provide a more risk-informed approach to other types of asset inspections, such as wood pole intrusive inspections. The use of a 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 6A - C)**

#### **A. Executive Incentive Compensation**

SDG&E’s safety culture is promoted 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>22</sup> Benefits programs that support 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 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>23</sup> Providing continued alignment between SDG&E’s safety programs and the ICP helps to strengthen the Company’s safety culture and reinforce to employees that safety is a core value of SDG&E.

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<sup>22</sup> D.16-06-054 at 153.

<sup>23</sup> A.22-05-015/016 (cons.), Ex. SCG-25-R-E/SDG&E-29-R-E (Robinson) at DSR-11.

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>24</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 2024 Safety Performance Metrics Report, SDG&E references its 2024 Executive ICP<sup>25</sup> and 2024 non-executive ICP and indicates whether each metric was tied to these incentive plans in 2024. Since this is an annual submission, SDG&E references the reporting year’s incentive plan (*i.e.*, next year’s submission will reference the 2025 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, for which safety is foundational. 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 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

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<sup>24</sup> D.19-04-020 at 63 (OP 6A).

<sup>25</sup> For purposes of the SPM report, the SMAP Phase 2 Decision defines “executive” with “executive level defined as positions at the Director level and higher.” D.19-04-020 at 27. Sempra’s ICP definition differs from this definition and defines “executive” as Vice President and above. However, as discussed *infra*, safety performance is a goal for both the executive and non-executive ICP.

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 2024 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>26</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 2024 Executive and non-executive Incentive Compensation Plans. These measures, as further described in each applicable metric in Section V below, are designed to incent employees and executives to meet specified safety targets.

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<sup>26</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."

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 incentive payouts for safety measures.

Safety is a core value and a top priority for SDG&E, and the weighting of the safety measures in the 2024 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 at all.

## **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>27</sup> SDG&E's 2024 Executive ICP and 2024 non-executive ICP each include twelve separate safety-related performance measures.<sup>28</sup> These safety-related performance

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<sup>27</sup> D.19-04-020, OP 6.C. at 63.

<sup>28</sup> For the period of January 1, 2024 to December 31, 2024, SDG&E had in place a “2024 Executive Incentive Compensation Plan” and a “2024 Incentive Compensation Plan.” The S-MAP Phase Two Decision defines “executive” as “director level and higher.” SDG&E directors are covered by SDG&E's

measures comprise a mixture of leading and lagging measures and span all lines of business – fire, employee and public safety, gas safety, and electric safety - 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 pre-established 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 plans. 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 management activities over future GRC cycles.<sup>29</sup> As described in SDG&E’s TY 2024 GRC testimony,<sup>30</sup> SDG&E began operating within a SMS in 2020, which advances these goals by

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Incentive Compensation Plan (*i.e.*, the “2024 non-executive Incentive Compensation Plan”). Therefore, SDG&E refers to both the 2024 Executive Incentive Compensation Plan and the 2024 Incentive Compensation Plan herein.

<sup>29</sup> A.17-10-007/-008 (cons.), Ex. SCG-02-R/SDGE-02-R, Chapter 1 (Day) at DD-25 – DD-26, Figure DD-4.

<sup>30</sup> A.22-05-015/-016 (cons.), Ex. SDG&E-31-R (Deremer) at KJD-20.

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-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 2024 GRC**

D.14-12-025 directs the IOU to 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>31</sup> D.19-04-020 found that it was “premature to approve specific [Risk Mitigation Accountability Report (RMAR)] requirements or to require separate, more general RMARs at this time,”<sup>32</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>33</sup> At this time, RMAR is within the scope of Phase 4, Track 1 of the RDF proceeding.<sup>34</sup>

SDG&E filed its TY 2024 GRC Application on May 16, 2022.<sup>35</sup> Among other things, SDG&E’s GRC Application included requests related to mitigating its key safety risks and integrated the results from the Company’s RAMP filed on May 17, 2021 (2021 RAMP).<sup>36</sup> SDG&E’s 2021 RAMP filing significantly informed the TY 2024 General Rate Case results. The

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<sup>31</sup> D.14-12-025 at 46.

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

<sup>33</sup> *Id.*

<sup>34</sup> See R.20-07-013, Assigned Commissioner’s Phase 4 Scoping Memo and Ruling (September 13, 2024) at 7-8.

<sup>35</sup> A.22-05-016, 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, 2024 (May 16, 2022).

<sup>36</sup> A.21-05-011/014 (cons.), Risk Assessment and Mitigation Phase Report of San Diego Gas & Electric Company and Southern California Gas Company (May 17, 2021).

below tables provide a high-level summary of SDG&E’s total estimated risk mitigation spending as presented in the 2021 RAMP filing and approved in the TY 2024 GRC.

The TY 2024 GRC Decision was approved by the Commission on December 19, 2024.<sup>37</sup> The TY 2024 GRC Decision did not explicitly distinguish between authorized funding of RAMP activities versus non-RAMP activities. Therefore, for purposes of TY 2024 GRC authorized amounts (based on SDG&E’s 2021 RAMP submission), it was necessary for SDG&E 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 the GRC presentations. This SPMR reflects SDG&E’s total estimated risk mitigation spending as presented in the approved TY 2024 GRC and applicable RAMP filings.

The TY 2024 GRC Decision states “[t]he adopted revenue requirement and PTY increases will ensure that Southern California Gas Company (SoCalGas) and SDG&E can maintain the safety, reliability, and efficiency of their natural gas transmission, distribution, and storage systems and electric distribution systems. This will enable them to continue providing their customers with safe and reliable energy services while maintaining reasonable rates.”<sup>38</sup> Further, in its TY 2024 GRC Decision, the Commission did “not reconsider its previous decisions regarding Sempra’s risk-related showings in its prior RAMP and GRC proceedings.”<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

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<sup>37</sup> D.24-12-074.

<sup>38</sup> *Id.* at 5.

<sup>39</sup> *Id.* at 52.

most recent GRC.”<sup>40</sup> SDG&E includes preliminary responsive 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 align with its GRC presentation.<sup>41</sup> SDG&E’s 2024 Risk Spending Accountability Report (RSAR) is currently underway. Once filed, SDG&E’s RSAR will provide comprehensive detail on spending activities presented in SDG&E’s 2021 RAMP Report and TY 2024 GRC proceeding, including variance explanations for those activities/programs that meet the CPUC’s variance criteria threshold.<sup>42</sup>

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

<b>SDG&amp;E O&amp;M Details (2024 Direct \$000)</b>					
<b>RAMP Chapter</b>	<b>RAMP Risk Description</b>	<b>2024 Actuals</b>	<b>2024 Imputed Authorized</b>	<b>\$ Variance</b>	<b>% Variance</b>
<b>SDG&amp;E-01</b>	Wildfire Involving SDG&E Equipment	155,175	169,684	(14,509)	-9%
<b>SDG&amp;E-02</b>	Electric Infrastructure Integrity	37,545	24,367	13,178	54%
<b>SDG&amp;E-03</b>	Incident Related to the High-Pressure System (Excluding Dig-in)	36,946	15,749	21,197	135%
<b>SDG&amp;E-04</b>	Incident Involving a Contractor	1,044	1,206	(162)	-13%
<b>SDG&amp;E-05</b>	Customer and Public Safety – Contact with Electric Equipment	395	1,767	(1,372)	-78%
<b>SDG&amp;E-06</b>	Cybersecurity	13,796	18,166	(4,370)	-24%
<b>SDG&amp;E-07</b>	Excavation Damage (Dig-In) on the Gas System	10,844	5,161	5,683	110%
<b>SDG&amp;E-08</b>	Incident Involving an Employee	7,030	6,164	866	14%
<b>SDG&amp;E-09</b>	Incident Related to the Medium-Pressure System (Excluding Dig-in)	31,305	31,959	(654)	-2%

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

<sup>41</sup> For this reason, Tables 2 and 3 of this 2024 SPMR should be read in conjunction with SDG&E’s 2024 Risk Spending Accountability Report, which will be filed on May 30, 2025.

<sup>42</sup> Per D.22-10-002, the IOU RSAR filing date was extended to April 30 annually. On January 27, 2025, SoCalGas and SDG&E requested an extension to file the 2024 RSAR on May 30, 2025, which was approved on February 21, 2025 by the Director of Energy Division. As a result, the authorized and recorded O&M and Capital spending activities for SDG&E’s 2024 RSAR are preliminary and may change as the costs are finalized in the 2024 RSAR.

SDG&E O&M Details (2024 Direct \$000)					
RAMP Chapter	RAMP Risk Description	2024 Actuals	2024 Imputed Authorized	\$ Variance	% Variance
CFF-1	Asset Management	854	1,225	(371)	-30%
CFF-4	Foundational Technology Systems	27,352	30,188	(2,836)	-9%
CFF-5	Physical Security	2,525	2,539	(14)	-1%
CFF-6	Records Management	1,462	1,771	(309)	-17%
CFF-7	Safety Management System	605	1,421	(816)	-57%
	<b>Total SDG&amp;E RAMP</b>	<b>326,878</b>	<b>311,367</b>	<b>15,511</b>	<b>5%</b>

SDG&E’s 2021 RAMP Report forecasted RAMP activities for the years 2022 through 2024.

SDG&E’s TY 2024 GRC presented capital forecasts for the GRC cycle (*i.e.*, 2022-2024).<sup>43</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>44</sup> Reprioritizing spending allows utilities to “[r]espond to immediate or short-term crises outside of the RAMP and GRC process,”<sup>45</sup> in accordance with Commission directives. 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>46</sup> With the TY 2024 GRC Decision, SDG&E began executing on new and/or incremental programs presented during the TY 2024 GRC proceeding (and emergent activities that were not identified in the TY 2024 GRC).

<sup>43</sup> D.20-01-002 at 52, extended the GRC cycle for each large California IOU from three to four years.

<sup>44</sup> D.20-01-002 at 38.

<sup>45</sup> D.18-04-016 at 6 (citing D.16-08-018 at 151-152).

<sup>46</sup> D.16-08-018 at 152.

*Table 3 - SDG&E Preliminary Total Risk Mitigation Spending: Capital*

<b>SDG&amp;E Capital Details (2024 Direct \$000)</b>					
<b>RAMP Chapter</b>	<b>RAMP Risk Description</b>	<b>2024 Actuals</b>	<b>2024 Imputed Authorized</b>	<b>\$ Variance</b>	<b>% Variance</b>
<b>SDG&amp;E-01</b>	Wildfire Involving SDG&E Equipment	480,506	388,951	91,555	24%
<b>SDG&amp;E-02</b>	Electric Infrastructure Integrity	101,901	145,391	(43,490)	-30%
<b>SDG&amp;E-03</b>	Incident Related to the High-Pressure System (Excluding Dig-in)	110,851	47,662	63,189	133%
<b>SDG&amp;E-04</b>	Incident Involving a Contractor	2,309	2,973	(664)	-22%
<b>SDG&amp;E-06</b>	Cybersecurity	4,013	11,409	(7,396)	-65%
<b>SDG&amp;E-07</b>	Excavation Damage (Dig-In) on the Gas System	0	210	(210)	-100%
<b>SDG&amp;E-09</b>	Incident Related to the Medium Pressure System (Excluding Dig-in)	136,898	56,555	80,343	142%
<b>CFF-1</b>	Asset Management	3,087	10,157	(7,070)	-70%
<b>CFF-4</b>	Foundational Technology Systems	53,769	74,579	(20,810)	-28%
<b>CFF-6</b>	Records Management	2,431	1,035	1,396	135%
	<b>Total SDG&amp;E RAMP</b>	<b>895,765</b>	<b>738,922</b>	<b>156,843</b>	<b>21%</b>

**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>47</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.

<sup>47</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.

**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>48</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.”

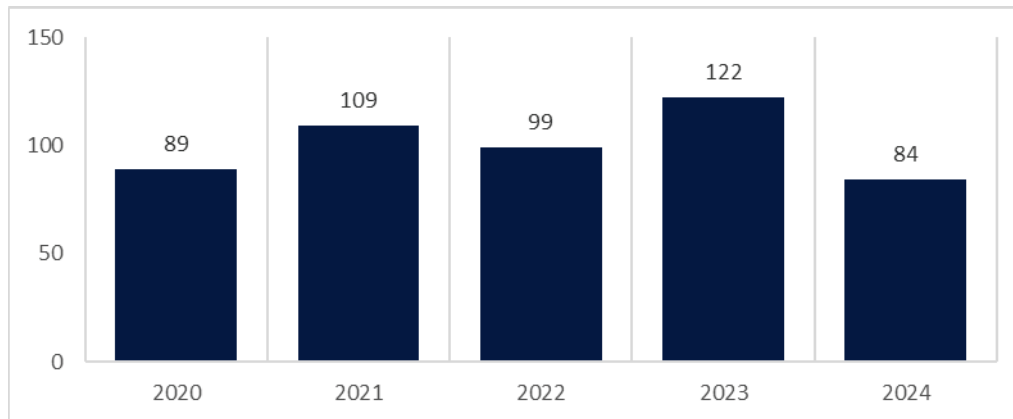
**Risks:** Wildfire; Transmission Overhead Conductor; Distribution Overhead Conductor Primary.

**Category:** Electric.

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

**Summary:**

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



**Metric Background:**

As provided in the metric description, a downed conductor, or “wires 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 wires 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 wires down event and has a dedicated team reviewing all wires down events to determine the root cause and identify any trends to potentially trigger the

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<sup>48</sup> The metric name and description, risks, category, and units for each metric comes directly from D.21-11-009, Appendix B.

development of a new program. The identification of wires 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. Historically, more wires down events generally occur in January and February than other months due to weather conditions.

SDG&E has implemented programs targeting the wires most prone to potential wires 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:**

SDG&E mitigation efforts have helped decrease primary wires down events to the Company's lowest total in the past five years. This is a result of the mitigation programs that have been implemented. In addition, in 2024 there were no transmission wires down.

**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 2024 Executive and non-executive Incentive Compensation Plans include "Employee and Public Safety" performance measures. SDG&E has the following systematic program for mitigating wildfire risk through reducing wires down events, as included in the 2024 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.

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 2024 report submission, SDG&E references the incentive compensation plans in place during 2024.

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

- Yes. As described above, SDG&E’s 2024 Executive Incentive Compensation and non-executive Incentive Compensation Plans includes an Employee and Public Safety metric: Wildfire & PSPS System Hardening. This metric has a weight of 5% of the 57% overall safety weighting for SDG&E’s 2024 Executive ICP and 3% of the 34% overall safety weighting for SDG&E’s 2024 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 2024 Executive ICP or 2024 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.”

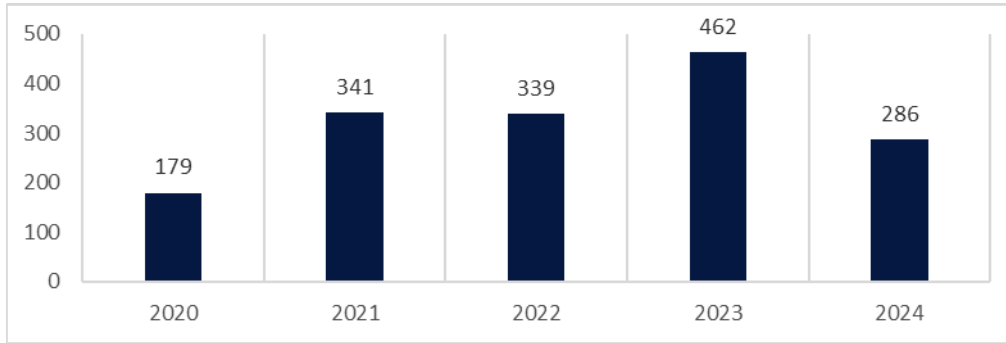
**Risks:** Wildfire; Transmission Overhead Conductor; Distribution Overhead Conductor Primary.

**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 “wires 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 wires 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:**

Tracking of secondary wires down began in June of 2020, and in 2024, SDG&E achieved its lowest full-year metric result. In addition, in 2024 there were no transmission wires down.

**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 2024 Executive and non-executive Incentive Compensation Plans include “Employee and Public Safety” performance measures. SDG&E has the following systematic program for mitigation wildfire risk through reducing wire down events, as included in the 2024 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 2024 report submission, SDG&E references the incentive compensation plans in place during 2024.

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

- Yes. As described above, SDG&E’s 2024 Executive Incentive Compensation and non-executive Incentive Compensation Plans include an Employee and Public Safety metric: Wildfire & PSPS System Hardening. This metric has a weighting of 5% of the 57% safety weighting for SDG&E’s 2024 Executive ICP and 3% of the 34% safety weighting for SDG&E’s 2024 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 2024 Executive ICP or 2024 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.”

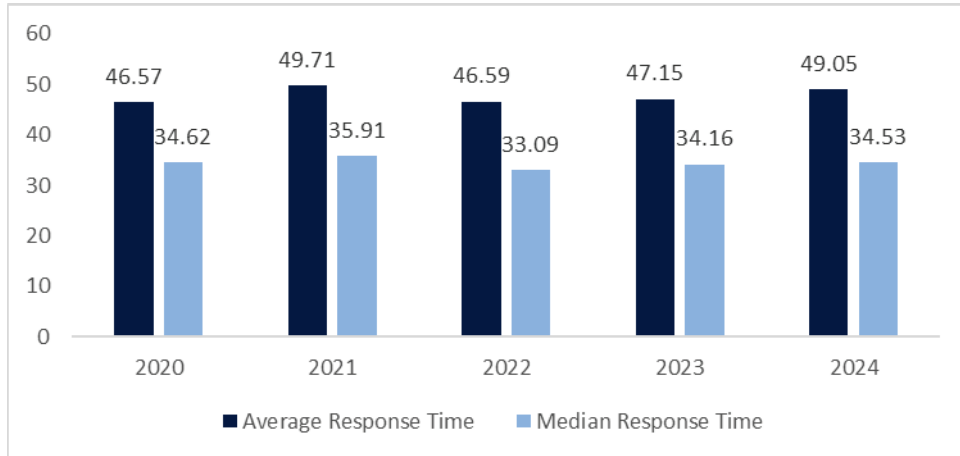
**Risks:** Wildfire; Overhead Conductor; Public Safety; Worker Safety.

**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. SDG&E performs manual reviews of outlier on-site arrival response times to correct anomalies resulting from human error (*e.g.*, the responder 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 metric performance for electric emergency response in 2024 remains consistent when comparing values from the prior four years, with no significant changes in the total annual count of emergency notifications year to year. A review of monthly metric performance data reflects that response times were primarily impacted during territory wide weather events or emergencies when requests to respond are numerous or coincide.

Several significant weather events had an impact on the metric performance in 2024, most notably in the first and last months of the year. The month of January included a large and rapid rainstorm that caused significant flooding across San Diego County impacting SDG&E customers and equipment. The months of November and December included several Santa Ana wind events that were associated with Red Flag Warnings, requiring support and responses from SDG&E. 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.”

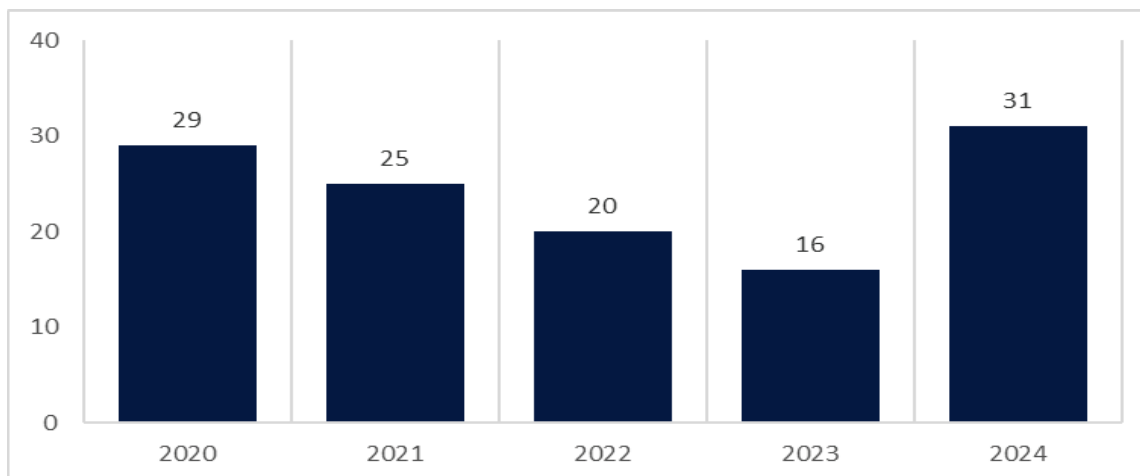
**Risks:** Overhead Conductor; Wildfire; Public Safety; Worker Safety; Catastrophic Event Preparedness.

**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 as a measure of last resort. 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.

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 related to electrical infrastructure. In 2019, SDG&E established a pilot Ignition Management Program (IMP). The Ignition Management Program (IMP) is considered a foundational component of grid design

operations and maintenance. The IMP alone does not mitigate the risk of wildfire but is critical in understanding the overall wildfire risk in relation to SDG&E equipment assets. This activity, in conjunction with other foundational activities, allows for mitigation prioritization, the calculation of Cost Benefit Ratio, and aids to effectively select and implement the right mitigations and controls to reduce the risk of wildfires.

The IMP has built processes to collect data from all internal stakeholders to track ignition and near miss ignitions, perform root cause analysis of incidents in an effort to determine the exact cause of the failure, and detect patterns or correlations. When the cause of the failure is determined, the mode of failure is reported to the appropriate mitigation owner for remedy. The IMP keeps creating new processes to grow and improve over time. Data gathering processes and quality of the data are continually reviewed with enhancements implemented as soon as they are identified.

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 and informs probability of ignition and fire risk models. This knowledge has led to more informed decisions in the areas of fire hardening, fire prevention, and overall risk. SDG&E's IMP also addresses compliance with ignition reporting requirements issued by the Commission and the California Office of Energy Infrastructure Safety (OEIS).

Since SDG&E began tracking ignitions 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 vehicle contact, foil balloons and flying patio umbrellas. 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. 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's Vegetation Management Program 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>49</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,
- The resulting fire traveled greater than one linear meter from the ignition point, and
- The utility has knowledge that the fire occurred.

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<sup>49</sup> D.14-02-015, OPs 7, 8 and 9 at 99, and Appendix C.

## **Metric Performance:**

There were a total of 31 reportable ignitions in 2024, with the total combined acreage of 51 acres for all reportable ignitions. One ignition in 2024 accounted for 47 of those acres with all other ignitions accounting for an average fire size of just over 1/10<sup>th</sup> of an acre. The relatively smaller ignition events reflect the environment being conducive to ignition in the region in 2024 and help to highlight the importance of mitigations that are put in place to reduce the likelihood of fire spread and reduce the consequence of an ignition. The 47-acre fire occurred in an area with cured grasses and topography in alignment with the spread but was stopped within 12 hours of ignition. This event provided an opportunity to discuss internal and external procedures that are designed to provide for the safety of all responders, increase the efficiency of the response, and reduce any potential impacts.

## **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 2024 Executive and 2024 non-executive ICP plans include the following “Employee 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, 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 2024 report submission, SDG&E references the incentive compensation plans in place during 2024.

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

- Yes. As described above, SDG&E’s 2024 Executive Incentive Compensation and 2024 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 2024 Executive ICP and 3% of the 34% safety weighting for SDG&E’s 2024 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 2024 Executive ICP or 2024 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.”

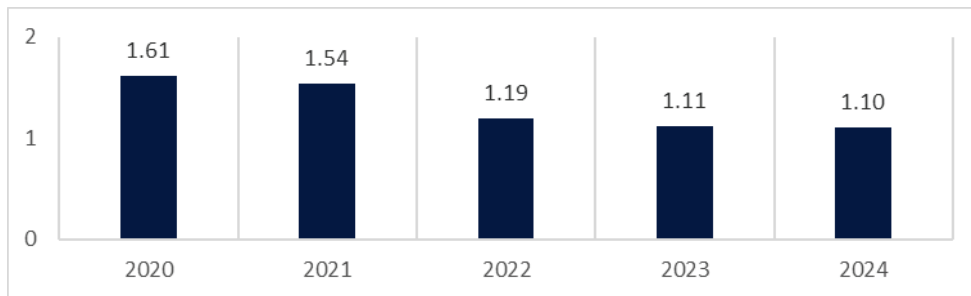
**Risks:** (1) Transmission Pipeline Failure - Rupture with Ignition, (2) Distribution Pipeline Rupture with Ignition (non-Cross Bore). (3) Catastrophic Damage involving Gas Infrastructure (Dig-Ins).

**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>50</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 American 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:**

While the overall dig-in rate for 2024 improved slightly, compared to 2023, SDG&E observed a near 5% increase in 811 USA tickets compared to the previous year. Additionally, there was a slight rise in excavation damages, with 18 more incidents than in 2023. Company Damage Prevention Analysts conducted over 75 outreach events, educating contractors on safe excavation practices and fostering ongoing relationships. They also completed over 2500 Field Contact Non-Dig In visits, which are face-to-face interactions discussing the contractor's or homeowner's project before excavation. During these visits, they review the 811 USA ticket, inform their audience about the utilities in the work area, and provide Dig Alert Law information for future projects.

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<sup>50</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).

In Q4 of 2024, SDG&E launched the 811 Dig Champions Ambassador Program, enabling all SDG&E employees to submit a near-miss form whenever they observe unsafe excavation practices in the field. This "See Something, Say Something" approach empowers everyone to be a safety champion in an effort to reduce excavation damages.

**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 2024 Executive Incentive Compensation and 2024 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 2024 report submission, SDG&E references the incentive compensation plans in place as of 2024.

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

- Yes. As described above, SDG&E’s 2024 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 2024 Executive ICP and 3% of the 34% safety weighting for SDG&E’s 2024 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 2024 Executive ICP or 2024 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)*

	2020	2021	2022	2023	2024
Miles Inspected	31	43	0.5	31	5.5
Percent Inspected	14%	20%	0%	14%	3%

**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>51</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 219 miles of SDG&E’s transmission pipelines are located in HCA areas. The numbers and types of TIMP activities vary from year to year and are primarily based on the scheduling and timing of threats identified during baseline assessments and the interval of

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<sup>51</sup> 49 CFR § 192, Subpart O and § 192.710.

reassessments. At a minimum of every seven years for HCAs and every ten years for covered non-HCAs as identified in 49 CFR § 192.710, 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. ILI is the primary assessment method used by SDG&E, but other methods are employed as well. The TIMP reduces the risk of failure to the pipeline transmission system and SDG&E evaluates and enhances the program on a continual basis.

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 2015 through 2024 in the accompanying Excel file (Attachment B).

**Metric Performance:**

The fluctuations in ILI mileage are primarily driven by compliance with regulatory inspection intervals required per 49 CFR 192 Subpart O. The trend indicates a balance between conducting inspections through ILI as well as assessments through other appropriate methods, such as direct assessment.

The historical data provided for this metric has been updated to reflect the number of miles that were assessed through ILI, regardless of the number of tools used for the inspection. In previous reports, the miles reported were a sum of the total miles inspected by each tool type.

**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.”

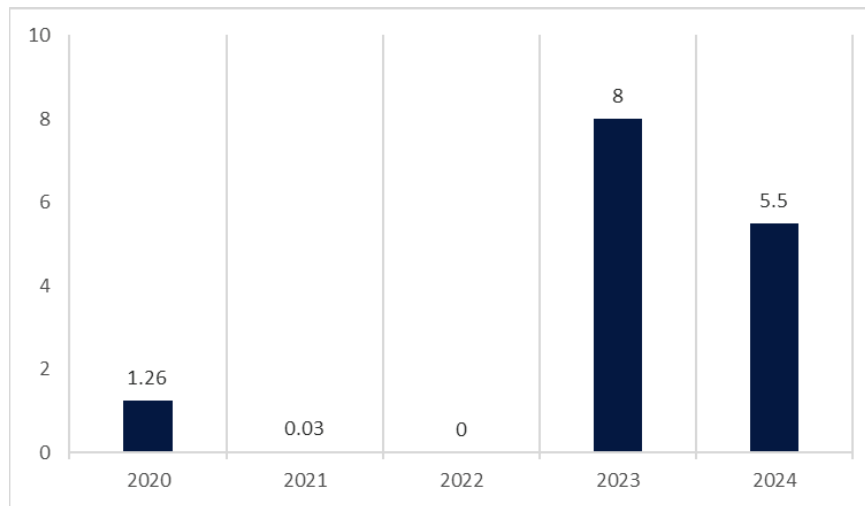
**Risks:** Catastrophic Damage Involving High-Pressure Pipeline Failure.

**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 generally prioritized assessing pipelines using ILI; approximately 71% of transmission pipelines operating in HCAs and approximately 74% of the entire transmission system are able to accommodate ILI tools as of the end of year 2024 (refer to Metric 13).

Particularly when ILI is determined to be an appropriate method of assessment for identified threats on a pipeline, SDG&E may retrofit along pipeline routes to allow sufficient clearance for an ILI tool if the pipeline is not already ILI-capable. A typical retrofit may include replacing valves with less-restrictive valves that allow inspection devices to traverse internally, installation 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 2015 through 2024 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 Form F 7100.2-1.<sup>52</sup>

**Metric Performance:**

SDG&E continues to evaluate opportunities to retrofit the transmission system for inline inspection. In 2024, SDG&E upgraded 5.5 miles of pipeline to allow for first-time inline inspections to more effectively assess newly active threats as a result of evolving federal requirements.<sup>53</sup>

**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

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<sup>52</sup> PHMSA, Gas Transmission and Gathering Annual Report Form F 7100.2-1, available at <https://www.phmsa.dot.gov/forms/gas-transmission-and-gathering-annual-report-form-f-71002-1>.

<sup>53</sup> Due to regulatory changes specified in 49 CFR § 192.917(e) that resulted from the *Pipeline Safety: Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments* final rule (84 FR 52180), new threats were activated that necessitated changes in assessment method to ILI.

## 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.”

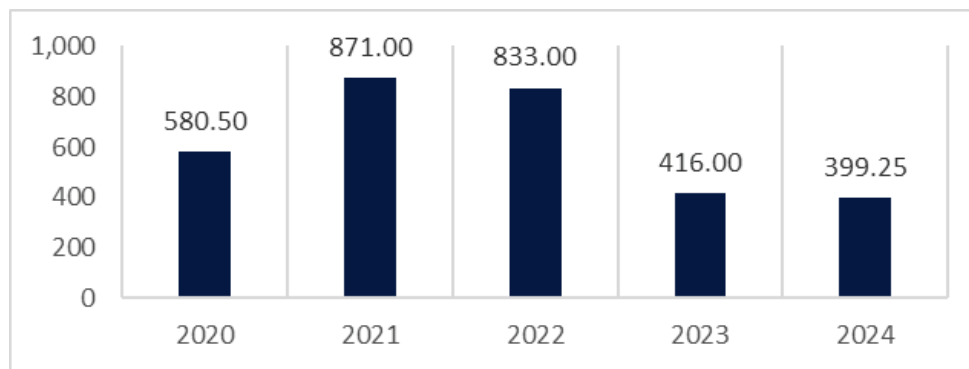
**Risks:** Distribution Pipeline Rupture with Ignition (non-Cross Bore).

**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 § 192.723. 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 Customer Service Field (CSF) technicians or Gas Emergency Department (GED) 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 2024 is included in the accompanying Excel file (Attachment B) reflecting the median time (in minutes) required for the utility representative to determine 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.

The reduction in the 'shut-in' time in 2024 for gas mains is primarily attributed to continuous performance improvement and adaptive learning efforts. The reprioritization of field decisions and enhanced oversight and coordination among field operations and gas operations personnel in controlling hazardous gas leaks continued the significant improvement achieved in shut-in times for mains. These adaptive learning efforts resulted in structured analysis of incident

response and identification of 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.”

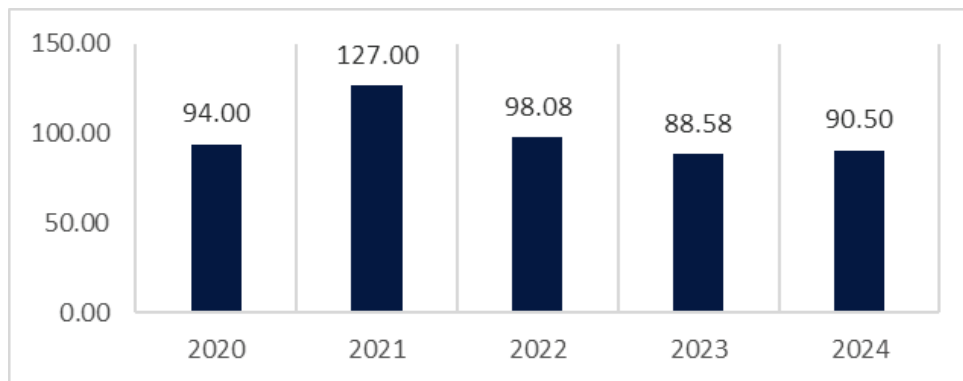
**Risks:** Distribution Pipeline Rupture with Ignition (non-Cross Bore).

**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 GED 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, and 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 2024 is included in the accompanying Excel file (Attachment B) reflecting the median time (in minutes) required for the utility representative to determine, 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.

The ‘shut-in’ time for gas services in 2024 has remained at approximately the same rate achieved in 2023. This stabilization of performance is primarily attributed to continuous performance reviews and adaptive learning efforts. SDG&E has continued to conduct structured reviews of the actions taken in response to incidents to 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)*

2020	2021	2022	2023	2024
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:**

The number of field inspections completed and the number of cross bore intrusions found are collected internally and used to calculate this metric. As stated above, SDG&E’s sewer lateral inspections were completed in 2012. SDG&E includes monthly data for 2015-2024 in the accompanying Excel file (Attachment B) and as visualized in the above chart, there is no data 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.”

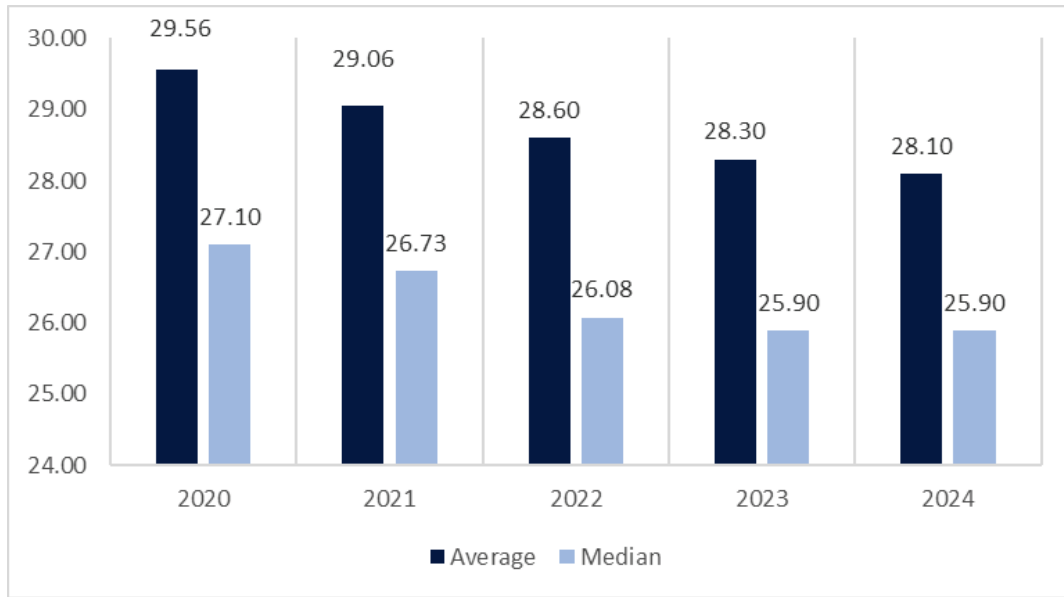
**Risks:** Distribution Pipeline Rupture with Ignition.

**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 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 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. These results have stayed consistent throughout the last five years. Please note, during a quality review of the data described in the chart above, an error was found in the reported data for 2020 in all prior SPMR reports (2020 – 2023). This has been corrected in the above chart and in attachment B.

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 2024 Executive Incentive Compensation Plan and 2024 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 2024 report submission, SDG&E references the incentive compensation plans in place during 2024.

**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 2024 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 2024 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 2024 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 2024 Executive ICP or 2024 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)*

	2020	2021	2022	2023	2024
Miles	142	147	147	157	162.5
Percentage	65%	68%	69%	72%	74%

**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>54</sup> determine the risk posed by these threats, schedule prescribed assessments to evaluate these threats, collect information about the condition of the pipelines, and take actions to minimize applicable threat and integrity concerns to reduce the risk of a pipeline failure. At a minimum of every seven years for HCAs and every ten years for non-HCAs as identified in 49 CFR § 192.710, 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 2015 through 2024.

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<sup>54</sup> 49 CFR § 192, Subpart O and § 192.710.

As stated above for Metric No. 7, SDG&E has focused on assessing pipelines using ILI. As of year-end 2024, approximately 74% 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 steady upward trend of this metric highlights the Company's dedication to enhancing integrity assessments and the safety of its gas system. Retrofitting may take place depending on the factors discussed under Metric No. 7 and SDG&E continues to evaluate these opportunities. For example, if threat and risk analysis results necessitate the use of ILI, SDG&E will retrofit a pipeline segment.

**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.”

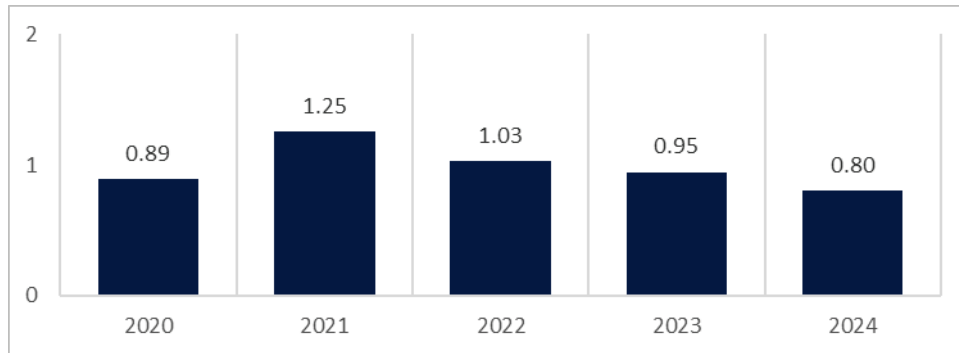
**Risks:** Employee Safety.

**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:**

The DART case rate measures injury and illness severity, representing the number of recordable incidents per 100 full-time workers that result in one or more days away from work, restricted work, or job transfers. It offers insights into the severity of work-related incidents over a calendar year.

**Metric Performance:**

In 2024, SDG&E experienced a 16% decrease in its DART case rate compared with the value at year-end 2023 as a result of a decrease in DART cases and an increase in overall hours worked. Ten years of monthly historical data are provided in the accompanying Excel file (Attachment B) for SDG&E’s Employee DART Rate. SDG&E’s DART Rate performance has shown a general reduction over the past 10 years.

**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 2024 Executive Incentive Compensation Plan and 2024 non-executive Incentive Compensation Plan include the following metric:

- Lost Time Incident (LTI) Rate<sup>55</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 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 2024 report submission, SDG&E references the incentive compensation plans in place during 2024.

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

- Yes. As described above, SDG&E’s LTI Rate performance is included in the 2024 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 2024 Executive ICP, applying to all SDG&E executives covered by the plan. It is weighted at 4% of the overall 34% public and employee safety operations measures in the 2024 non-executive ICP, applying 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 and above positions covered by either the 2024 Executive ICP or 2024 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

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<sup>55</sup> DART cases are OSHA Recordable Injuries or Illnesses resulting in Days Away from Work, or Days On Restricted Duty or Job Transfer.

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.”

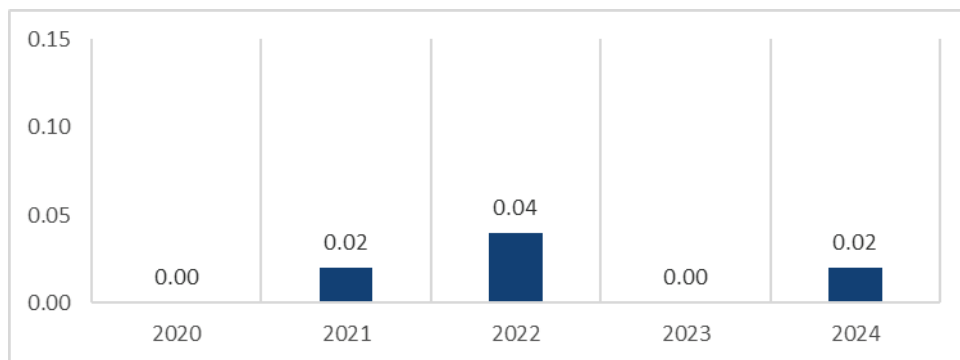
**Risks:** Employee Safety.

**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:**

Safety is a core value at SDG&E. Our safety-first culture focuses on employees, contractors, customers, and the public, and is integrated into 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 never compromised for production, customer satisfaction, or any other goals. No activity is so important that it should jeopardize employee, contractor, customer, or public safety. SDG&E’s Employee Safety risk mitigation programs are built on proven employee-based programs, safety training, workforce education, site inspections, and SDG&E’s Injury and Illness Prevention Program (IIPP). These programs are designed to identify,

address, communicate and eliminate workplace hazards, proactively contributing to overall workplace safety and employee awareness of safety issues and concerns. SDG&E continually evaluates opportunities to further reduce the risk of employee serious injuries or fatality.

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-related 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.

SDG&E notes that EEI Safety Classification and Learning (SCL) 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 (Appendix 8) and the basic definition that the event was life-threatening or life-altering.”<sup>56</sup> SDG&E has determined that the Cal/OSHA criteria may include classification of an injury as “serious” that the EEI SIF criteria would not allow, and vice versa. SDG&E also notes that a new definition of “Serious Injury” went into effect in California on January 1, 2020, which may affect the number of reportable incidents in 2020 and beyond.

### **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

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<sup>56</sup> Edison Electric Institute, *Safety Classification and Learning (SCL) Model* (Revised September 2024) at 12, available at <https://www.eei.org/-/media/Project/EEI/Documents/Issues-and-Policy/Power-to-Prevent-SIF/eeiSCLmodel.pdf?la=en&hash=4E03097C0292F52CB4FA186D0D8CE11876032836>.

these data currently are reported to Cal/OSHA at the time of occurrence.

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

- Yes, Serious Injuries are safety incidents with a likelihood to result in lost time. SDG&E’s 2024 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.
  - Field Safety Engagements - Documented reviews of activities where high-energy hazards are present to ensure the appropriate direct controls are in place to reduce or eliminate exposure and mitigate the risk of serious injuries and fatalities. This leading metric aligns with industry best practices utilizing a standard methodology to conduct High-Energy Control Assessments (HECA), and the EEI Safety Classification and Learning (SCL) Model. Field Safety Engagements are measured as a sum of each documented high-energy exposure assessment completed.
  - Driving Observations - The percentage of driving observations completed of employees required to drive a company vehicle as part of their job duties or who drive a vehicle more than 3,000 miles a year in the performance of their work. A driving observation is a documented driving observation completed by a supervisor, BBS observer, peer, or other observer. The goal is to complete one ride-along driving observation of each employee in this group during the year.
  - 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 this 2024 report submission, SDG&E references the incentive compensation plans in place during 2024.

**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 “Employee and Public Safety” category of SDG&E’s 2024 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 2024 non-executive Incentive Compensation Plan.

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

- Yes. SDG&E’s Employee and Public Safety performance measures are linked to all SDG&E director or above positions covered by either the 2024 Executive ICP or 2024 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.

**O. Metric No. 16: Rate of SIF Actual (Contractor)**

**Metric Name and Description per D.21-11-009:** “Rate of SIF Actual (Contractor): Rate of SIF Actual (Contractor) is calculated using the formula: Number of SIF-Actual cases among contractors x 200,000 / contractor hours worked, where SIF Actual is counted using the methodology developed by the EEI OHSC Safety and Classification Learning Model. If a utility has implemented a replicable, substantially similar evaluation methodology for assessing incidents where a SIF occurred, the utility may use that method for reporting this metric. If a utility opts to report the rate of SIF Actual using a method other than the EEI Safety Classification Model, it must explain how its methodology for counting SIF Actual differs and why it chose to use it. As a supplemental reporting requirement to the SIF Actual Rate for comparative purposes, all utilities shall also report SIF Actual Rate data based on OSHA reporting requirements under Section 6409.1 of the California Labor Code.”

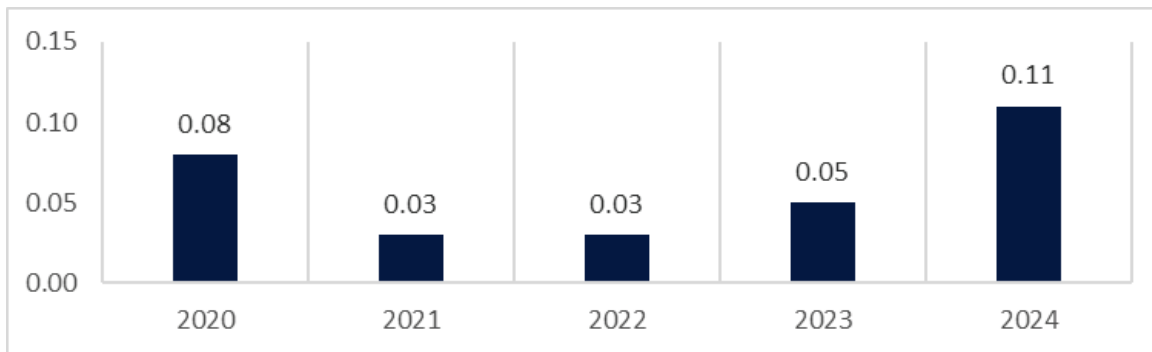
**Risks:** Contractor Safety.

**Category:** Injuries.

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

**Summary:**

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



**Metric Background:**

To determine the rate of SIF Actual (Contractor), 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 to Cal/OSHA of work-related serious injuries 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. All Class 1 Contractors are included in this metric.

**Metric Performance:**

In 2024, SDG&E experienced a contractor fatality when a worker was struck by a reversing backhoe on a work site. This incident along with three other serious injuries, contributed to an increase in SIF actuals among SDG&E contractors compared to recent history. SDG&E is collaborating with its contractor partners to learn from these incidents and implement preventative measures.

**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.”

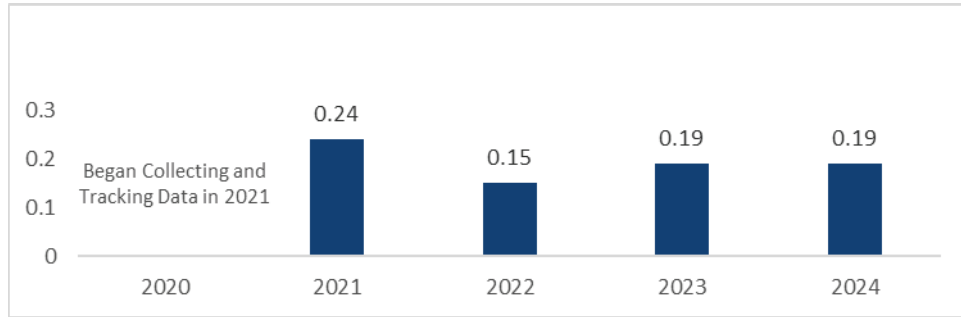
**Risks:** Employee Safety.

**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)*



#### **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 assessment of 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.

SDG&E’s Serious Injury and Fatality Exposure Assessment Program was implemented in March 2021 to provide 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.

A key lesson learned from the assessments is that the EEI methodology provides a powerful tool for hazard recognition and learning due to its hierarchical framework of risk severity. Scrutiny of SIF Potential events in a wide variety of situations can reveal common factors (e.g., hazards, risks, conditions and issues) within or across Company organizations. SDG&E can leverage the insights gained from the assessments and share them across the Company to raise awareness and

visibility of these factors to help strengthen SDG&E's safety-first culture and develop stronger and more effective corrective actions.

**Metric Performance:**

SDG&E's SIF-Potential Rate has remained relatively steady since full-year data assessment began in 2022. Data for the months of March 2021 through December 2024 are provided in the accompanying Excel file (Attachment B) for SDG&E's Employee SIF Potential rate.

**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>57</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

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<sup>57</sup> D.21-11-009, Appendix B at 8 (citation omitted). *See also* Edison Electric Institute, *Safety Classification and Learning (SCL) Model* (Revised September 2024), available at <https://www.eei.org/-/media/Project/EEI/Documents/Issues-and-Policy/Power-to-Prevent-SIF/eeiSCLmodel.pdf?la=en&hash=4E03097C0292F52CB4FA186D0D8CE11876032836>.

(Contractor), all utilities shall provide information about key lessons learned from SIF Potential (Contractor) incidents.

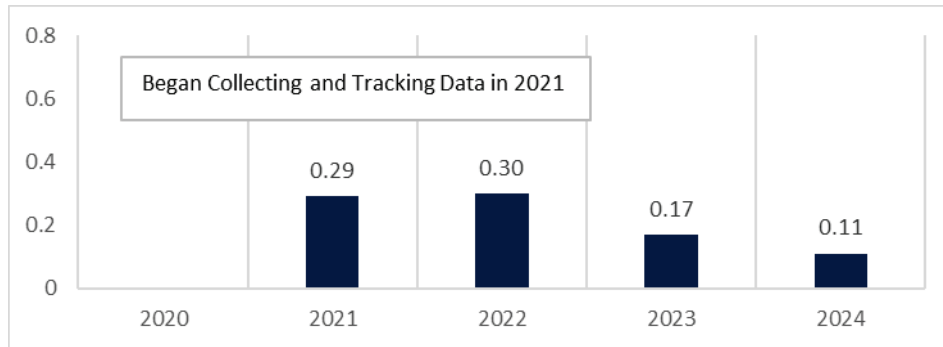
**Risks:** Contractor Safety.

**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:**

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 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 and with Contractors can lead to stronger and more effective corrective actions.

**Metric Performance:**

For 2024, SDG&E contractors reported a decrease in SIF-Potential events, the fewest since

inception of the program and tracking of SIF-Potential events began. This improvement is attributed to the continuous collaboration between SDG&E and its contractor partners, focusing on SIF awareness and prevention, and targeted communication addressing potential hazards and controls.

**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.

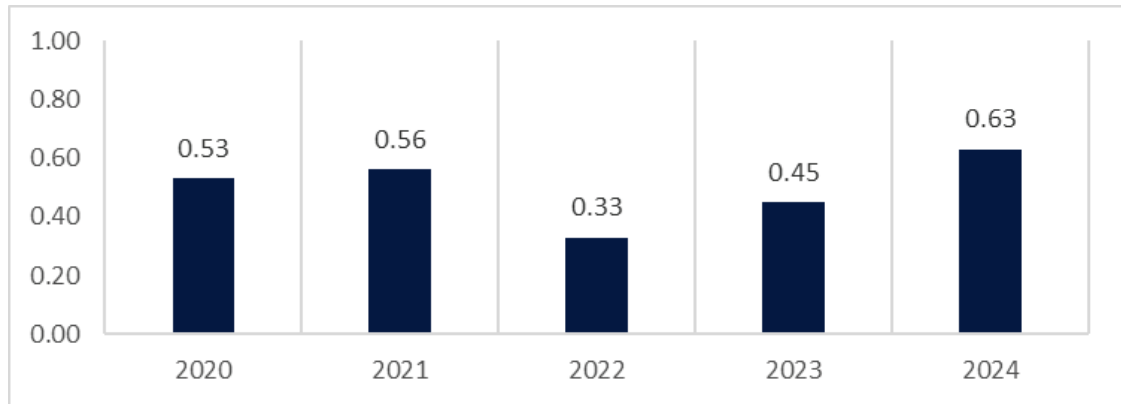
**Risks:** Contractor Safety.

**Category:** Injuries.

**Units:** OSHA DART Rate.

**Summary:**

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



**Metric Background:**

SDG&E has tracked DART Rate for Class 1 contractors since 2018. The DART case rate measures injury and illness severity, representing the number of recordable incidents per 100 full-time workers that result in one or more days away from work, restricted work, or job transfers. It offers insights into the severity of work-related incidents over a calendar year.

**Metric Performance:**

In 2024, SDG&E contractors reported 23 DART incidents, an increase of three compared to the 20 incidents reported in 2023. Using the data collected from these incidents, SDG&E has increased field observations of higher-risk activities with the aim of reducing DART incidents. Additionally, SDG&E has increased timely communications about hazards and incidents to its contractors utilizing numerous channels of communication, including quarterly meetings, monthly newsletter, incident alerts and debriefs, and ad hoc communications, as warranted.

**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.”

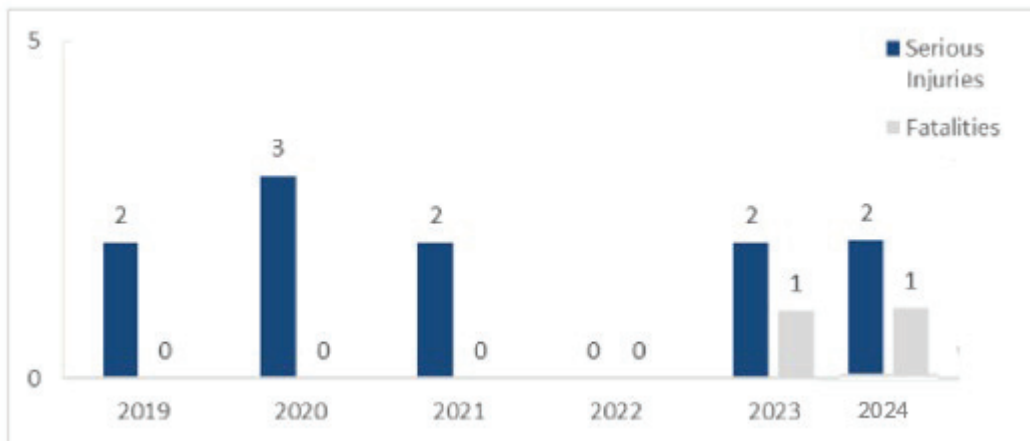
**Risks:** Public Safety.

**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, contractors, 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 2024 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>58</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>59</sup> Pursuant to D.19-04-020, on January 30, 2025, SDG&E submitted a draft of its Public-SIF data to the Commission’s Staff. On March 5, 2025, SPD informed the IOUs<sup>60</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>61</sup> SDG&E’s 2024 Pub-SIF data can be categorized as follows, as further represented in the charts below:

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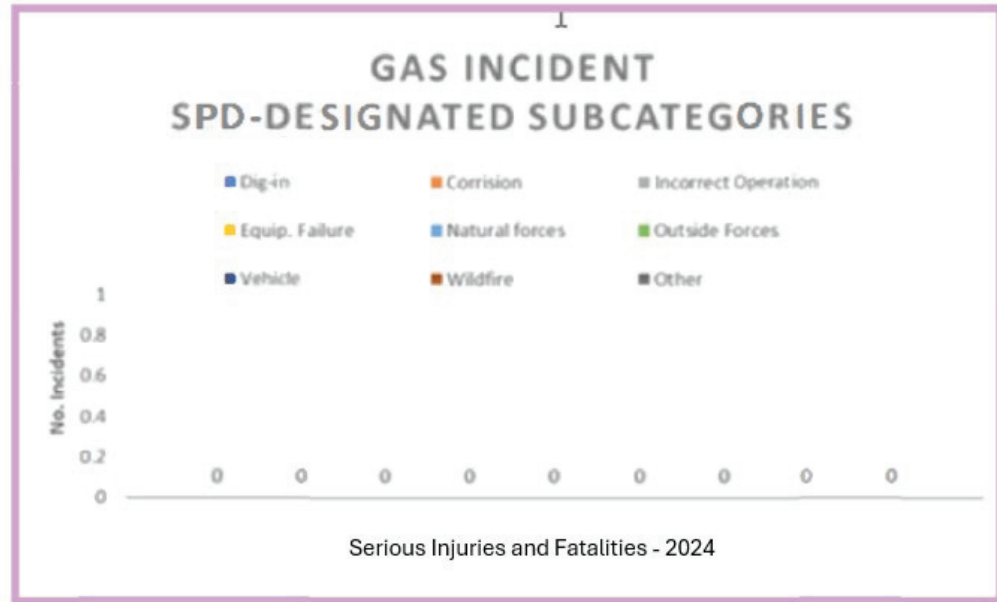
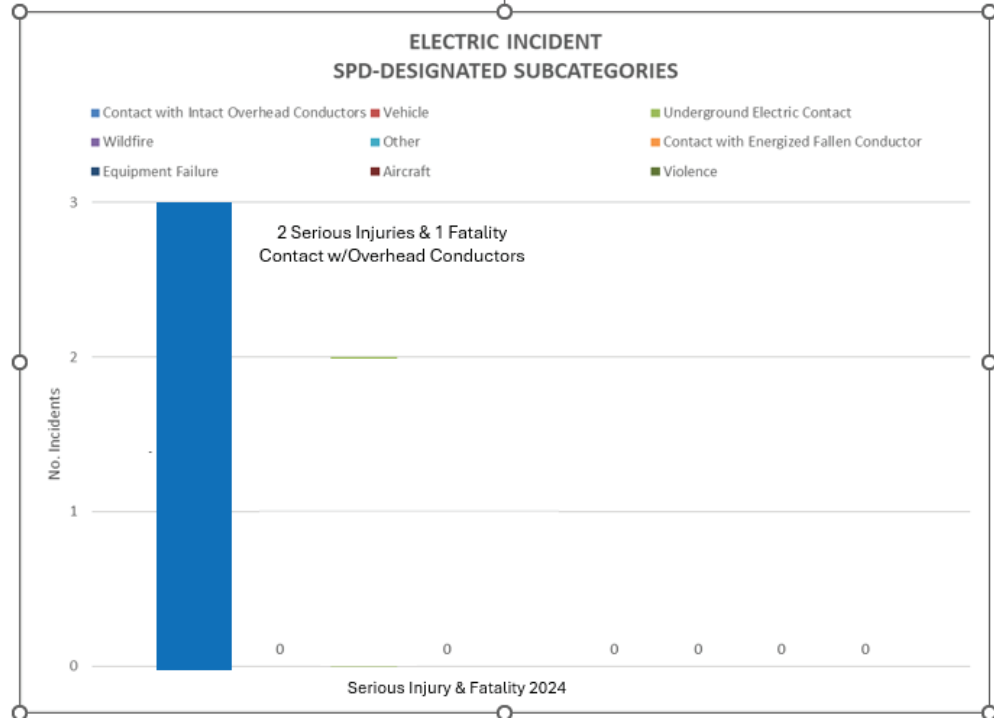
<sup>58</sup> In D.19-04-020, the Public Serious Injuries and Fatalities metric was contained in Metric 22. The modifications contained in D.21-11-009 changed the number of this metric to Metric 20. *See* D.21-11-009, Appendix F at 15.

<sup>59</sup> D.19-04-020 at 26, n.49.

<sup>60</sup> March 5, 2025, e-mail from Anwar Safvi, SPD staff, to SDG&E representative.

<sup>61</sup> SPD designated nine gas incident-related subcategories and nine electric incident-related subcategories, as reflected in the charts accompanying this Metric.

*2024 Charts of Public Serious Injuries and Fatalities Subcategories*



**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 2024 Executive Incentive Compensation Plan and 34% of SDG&E’s non-executive Incentive Compensation Plan is comprised of “Employee

and Public Safety” performance goals. SDG&E’s 2024 Executive and non-executive ICPs include the following employee and public 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)

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 2024 report submission, SDG&E references the incentive compensation plans in place during 2024.

**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 “Employee and Public Safety” category of SDG&E’s 2024 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 2024 non-executive Incentive Compensation Plan.

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

- Yes. SDG&E’s Employee and Public Safety performance measures are linked to all SDG&E director or above positions covered by either the 2024 Executive ICP or 2024 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>62</sup>

**Summary:**

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

Year	2020	2021	2022	2023	2024
Reportable Incidents	0	0	1	0	0

**Metric Background:**

SDG&E’s Aviation Services Department (ASD) is committed to upholding prudent 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 crewed and uncrewed aircraft (drones). Crewed 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. Uncrewed 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 professional services, characteristic of crewed operations, with its

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<sup>62</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.

uncrewed flight operations. ASD's mission for both its crewed and uncrewed 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:**

From 2015 through 2024, SDG&E has flown a total of 22,491 hours, and since 2018 has flown 11,215 Uncrewed Aerial System (UAS) flights. Monthly historical data for years 2015 through 2024 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.

**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)*

	2020	2021	2022	2023	2024
Number of Occurrences	Data collection began in 2022		18	28	27
Percentage of Total Wires Down			18.18%	22.95%	32.14%

**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-deenergize. 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:**

Overall, in 2024, the number of wires down events decreased while the number of wires down events where there was not automatic de-energization remained consistent with 2023 performance. There were no instances of transmission wires down events in 2024.

**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)*

	2020	2021	2022	2023	2024
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	0.00%	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.

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 nor distribution patrols or inspections were missed in 2024.

**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	2020	2021	2022	2023	2024
	Data collection began in June 2022		7.90%	7.71%	7.46%

**Metric Background:**

SDG&E’s grid hardening initiatives are intended to replace overhead (OH) conductor in areas of HFTD Tiers 2 and 3 with larger and stronger conductor or to underground the infrastructure to reduce the risk of failure and ignition. The criteria for selecting areas to be mitigated include the type of OH conductor (e.g., #6 copper wire), regions with high wind exposure, areas with dense vegetation, and locations with high potential for significant losses in the event of a fire.

**Metric Performance:**

This metric was introduced in 2021. 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)*

2020 Trans   Dist	2021 Trans   Dist	2022 Trans   Dist	2023 Trans   Dist	2024 Trans   Dist
0%   0%	0%   0%	0%   0%	0%   0%	0%   0%

**Metric Background:**

When SDG&E becomes aware of an instance of non-compliance with 49 CFR or 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.”

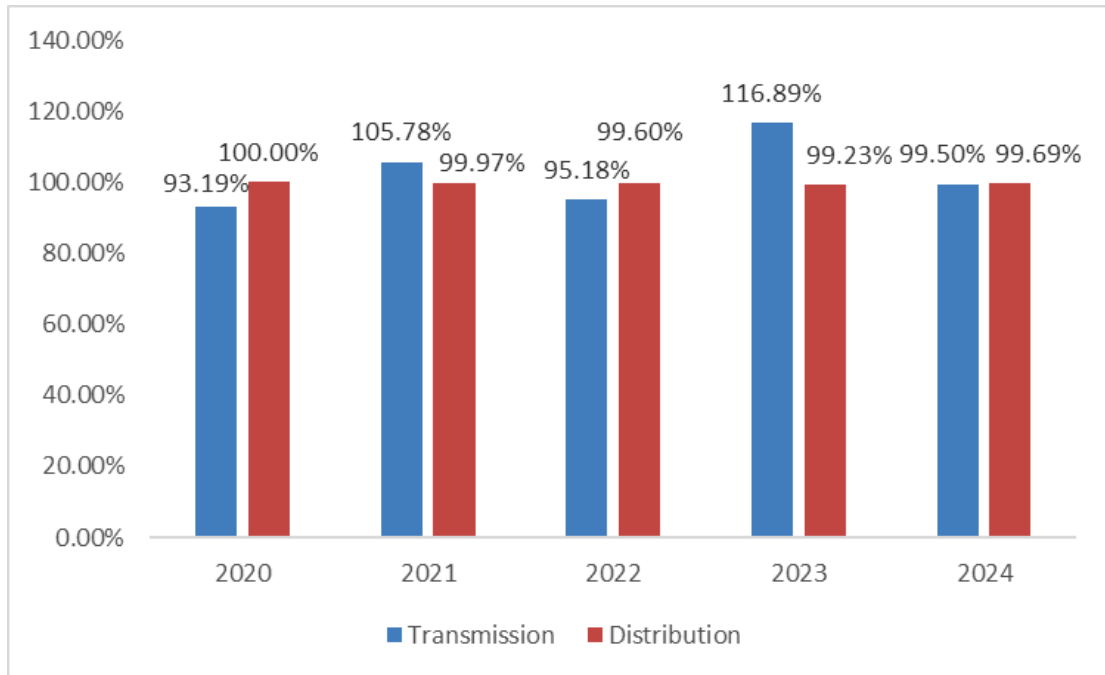
**Risks:** Electric Safety and Wildfire.

**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 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 within the timeframes 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, which allows for corrective action timelines to be extended under reasonable circumstances, such as permitting delays or access issues. 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).

For SDG&E’s distribution system, as described above, there are instances when the corrective action timelines described in GO 95, Rule 18 may be extended; however, there are instances when a deferral was not requested in time or when a job is erroneously cancelled. This occasionally occurs due to administrative errors or may be related to mislabeling a job within the Company’s notification tracking system. SDG&E has a quality control process to identify and monitor for these errors, but such identification may sometimes occur after the established completion deadline 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 GO 112-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	2020	2021	2022	2023	2024
Transmission	0	0	0	0	0
Distribution	0	0	0	1	0

**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.<sup>63</sup> 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.

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<sup>63</sup> In order to further mitigate incidents due to overpressure events, revisions to various company gas standards were made in 2022 to reflect new PHMSA Valve Rules and Regulations effective October 5, 2022 (April 8, 2022) available at <https://www.federalregister.gov/documents/2022/04/08/2022-07133/pipeline-safety-requirement-of-valve-installation-and-minimum-rupture-detection-standards>.

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 with the new reporting requirements.

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

- No.

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

- No.

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

- No.

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

- N/A

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

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

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

**Category:** Gas.

**Units:** Total number of missed inspections.

**Summary:**

Year	2020	2021	2022	2023	2024
Missed Inspections	0	0	0	2	0

**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>64</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 2015 through 2024 in the accompanying Excel file (Attachment B).

**Metric Performance:**

SDG&E completed all required in-line inspections in 2024. Additionally, the data for 2022 has been corrected from two inspections to zero; these inspections previously reported as missed were completed within the 6-month extension period authorized under 49 CFR § 192.939 and were therefore not missed. The data for 2023 has also been corrected to exclude an inspection that was performed through a non-ILI assessment method.

**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.

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<sup>64</sup> 49 CFR §§ 192.710 and 192.939.

**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	2024
Rate: Number of wires down occurrences per circuit mile X 1,000	0.00	0.00	0.00
Total Transmission wires down (excluding MEDs and secondary wires) included in metric #1	0	0	0
Total T&D circuit miles (excludes underground circuit miles)	8,411	8,380	8,332

Overhead Conductor Safety Index - Distribution	2022	2023	2024
Rate: Number of wires down occurrences per circuit mile X 1,000	11.77	14.56	10.08
Total Distribution wires down (excluding MEDs and secondary wires) included in metric #1)	99	122	84
Total T&D circuit miles (excludes underground circuit miles)	8,411	8,380	8,332

**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 tables represents the total transmission and distribution overhead circuit miles as of December 31, for each of the years 2022 through 2024. 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 wires down data presented for Metric #1 in this Report for 2024.

**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.)

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 1**

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

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015	9	7	6	3	0	6	7	3	5	3	7	4	60
2	2016	39	18	9	6	6	10	6	8	8	7	8	11	136
3	2017	52	19	4	6	2	6	7	7	9	6	6	5	129
4	2018	15	10	7	6	4	3	11	10	2	12	5	11	96
5	2019	9	21	14	10	4	4	9	6	9	6	13	7	112
6	2020	7	12	9	8	4	7	6	4	8	3	12	9	89
7	2021	13	9	4	7	12	5	4	9	3	15	3	25	109
8	2022	8	12	7	4	4	8	7	7	8	11	13	10	99
9	2023	16	19	25	9	7	5	8	10	6	7	6	4	122
10	2024	8	8	7	6	6	9	6	12	7	8	4	3	84

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

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 2**

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

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015	9	8	6	3	0	6	7	3	5	3	6	4	60
2	2016	40	19	9	6	5	10	6	11	9	7	8	12	142
3	2017	54	19	4	6	3	6	7	8	9	7	7	5	135
4	2018	15	10	7	6	4	3	11	10	2	12	5	11	96
5	2019	9	21	14	10	4	4	9	6	9	6	13	7	112
6	2020	7	12	9	8	4	7	6	18	32	8	37	31	179
7	2021	68	17	22	20	26	14	18	24	17	39	10	66	341
8	2022	25	30	19	16	19	28	13	20	47	43	55	24	339
9	2023	95	81	76	27	13	16	25	59	15	15	28	12	462
10	2024	31	27	27	19	17	18	25	25	20	24	36	17	286

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 [including Major Event Days; secondary distribution wire not included]

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 3**

**ELECTRIC EMERGENCY RESPONSE TIME**

**2015-2024**

Line No.	Year		January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	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
2	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
3	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
4	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
5	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
6	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
7	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
8	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
9	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
10	2024	avg	52.35	49.76	43.72	45.30	47.67	50.57	48.41	48.18	41.70	49.28	62.45	48.74	49.05
		med	34.83	35.04	32.08	34.41	35.50	36.60	36.68	34.30	31.88	33.29	38.84	32.64	34.53

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 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.

2024 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		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of					
	≥ 05 Min	< 05 Min	≥ 10 Min	< 15 Min	≥ 15 Min	< 20 Min	≥ 20 Min	< 25 Min	≥ 25 Min	< 30 Min	≥ 30 Min	< 35 Min	≥ 35 Min	< 40 Min	≥ 40 Min	< 45 Min	≥ 45 Min	< 50 Min	≥ 50 Min	< 55 Min	≥ 55 Min	< 60 Min
2015	28	39	64	139	147	153	136	116	96	72	72	72	47	691								
1	1	4	10	9	9	17	14	8	9	6	4	2	35									
2	0	2	3	8	12	6	5	7	4	8	4	6	48									
3	5	1	4	9	15	13	11	9	7	4	5	2	48									
4	3	3	5	13	15	14	10	9	6	7	5	9	59									
5	4	3	4	11	11	13	10	11	7	5	3	3	53									
6	4	3	7	6	8	11	20	3	10	6	6	6	54									
7	2	6	5	5	14	6	12	12	5	10	7	1	75									
8	2	5	2	20	15	15	13	11	12	6	9	4	71									
9	1	4	6	24	14	18	11	11	9	4	5	4	72									
10	0	1	3	10	9	12	11	6	12	7	7	4	54									
11	3	3	9	12	11	13	8	14	8	4	11	4	62									
12	3	4	6	12	14	15	11	15	7	5	6	2	60									

Year / Month	Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of					
	≥ 05 Min	< 05 Min	≥ 10 Min	< 15 Min	≥ 15 Min	< 20 Min	≥ 20 Min	< 25 Min	≥ 25 Min	< 30 Min	≥ 30 Min	< 35 Min	≥ 35 Min	< 40 Min	≥ 40 Min	< 45 Min	≥ 45 Min	< 50 Min	≥ 50 Min	< 55 Min	≥ 55 Min	< 60 Min
2016	19	38	103	161	161	185	158	117	105	106	89	78	861									
1	1	3	7	10	17	12	19	10	15	13	10	7	149									
2	2	5	10	12	11	15	7	8	9	8	7	7	94									
3	3	5	6	18	16	21	8	7	7	5	8	9	69									
4	2	1	13	14	11	18	12	10	5	10	3	7	45									
5	2	4	9	6	6	18	11	12	6	12	5	5	43									
6	2	1	10	16	16	16	15	14	7	5	9	5	65									
7	1	3	5	17	9	14	8	8	9	8	8	2	59									
8	0	4	8	18	13	17	21	16	11	8	12	6	64									
9	1	1	9	14	14	13	19	7	8	12	5	6	75									
10	2	6	10	11	21	11	7	10	12	8	6	7	65									
11	2	2	8	10	11	13	16	10	8	9	6	6	66									
12	1	3	8	15	16	17	15	5	8	8	10	11	67									

Year / Month	Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of				
	≥ 05 Min	< 05 Min	≥ 10 Min	< 10 Min	≥ 15 Min	< 20 Min	≥ 20 Min	< 25 Min	≥ 25 Min	< 30 Min	≥ 30 Min	< 35 Min	≥ 35 Min	< 40 Min	≥ 40 Min	< 45 Min	≥ 45 Min	< 50 Min	≥ 50 Min	< 55 Min	≥ 55 Min	< 60 Min	≥ 60 Min
2017	22	33	85	141	176	191	176	191	176	191	176	135	176	135	125	115	115	87	87	65	65	878	878
1	6	1	4	13	13	17	13	17	13	17	21	16	17	16	17	18	18	11	11	8	8	143	143
2	3	4	6	17	17	15	17	15	17	15	17	16	17	16	9	9	9	11	11	5	5	70	70
3	2	5	6	12	16	18	16	18	16	18	8	13	8	13	6	10	10	11	11	8	8	48	48
4	1	6	6	16	15	20	15	20	16	20	10	9	10	9	10	3	3	1	1	6	6	59	59
5	0	5	8	10	19	19	10	19	19	19	19	11	19	11	5	5	9	9	4	4	66	66	
6	0	3	9	19	10	16	10	16	16	13	13	10	13	7	12	12	8	8	5	5	80	80	
7	1	2	3	3	12	11	12	11	11	18	18	7	18	12	8	8	5	5	3	3	60	60	
8	3	3	8	14	16	23	16	23	23	16	16	11	16	11	10	14	14	7	7	4	4	70	70
9	1	0	8	9	10	13	9	13	13	13	12	12	12	7	8	8	4	4	5	5	74	74	
10	1	0	9	5	16	15	16	15	15	15	15	5	15	9	8	8	7	7	7	7	59	59	
11	0	2	10	13	15	13	15	13	13	11	11	11	11	8	7	7	6	6	7	7	62	62	
12	4	2	8	10	17	11	17	11	11	15	15	14	15	16	13	13	7	7	3	3	87	87	

Year / Month	Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of	
	≥ 05 Min	< 05 Min	≥ 10 Min	< 10 Min	≥ 15 Min	< 20 Min	≥ 20 Min	< 25 Min	≥ 25 Min	< 30 Min	≥ 30 Min	< 35 Min	≥ 35 Min	< 40 Min	≥ 40 Min	< 45 Min	≥ 45 Min	< 50 Min	≥ 50 Min	< 55 Min	≥ 55 Min	< 60 Min	≥ 60 Min	
2018	17	33	99	142	173	217	173	217	173	217	172	159	172	141	114	114	91	91	80	80	870	870		
1	0	2	10	7	12	23	12	23	23	16	16	7	16	14	8	8	4	4	7	7	86	86		
2	2	1	12	9	6	21	6	21	21	15	15	8	15	15	11	11	5	5	5	5	73	73		
3	6	9	9	10	15	17	15	17	17	15	13	13	14	14	6	6	12	12	4	4	79	79		
4	2	3	5	9	18	16	18	16	16	18	11	11	8	8	12	12	6	6	4	4	56	56		
5	0	1	7	13	14	23	14	23	23	15	17	17	8	8	12	12	7	7	4	4	56	56		
6	0	1	6	17	17	20	17	20	20	19	14	14	11	11	12	12	8	8	13	13	81	81		
7	2	2	7	18	14	14	14	14	14	14	8	8	11	11	11	11	8	8	7	7	78	78		
8	0	2	5	14	12	13	12	13	13	7	23	23	10	10	9	9	8	8	11	11	82	82		
9	0	2	8	11	11	10	11	10	10	10	11	11	9	9	13	13	7	7	2	2	61	61		
10	2	4	8	8	20	19	20	19	19	14	10	10	15	15	4	4	11	11	12	12	66	66		
11	0	4	10	13	18	23	18	23	23	16	24	24	15	15	5	5	10	10	6	6	73	73		
12	3	2	12	13	16	18	16	18	18	13	13	13	11	11	11	11	5	5	5	5	79	79		

Year / Month	Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of								
	< 05 Min	≥ 05 Min	< 10 Min	≥ 10 Min	< 15 Min	≥ 15 Min	< 20 Min	≥ 20 Min	< 25 Min	≥ 25 Min	< 30 Min	≥ 30 Min	< 35 Min	≥ 35 Min	< 40 Min	≥ 40 Min	< 45 Min	≥ 45 Min	< 50 Min	≥ 50 Min	< 55 Min	≥ 55 Min	< 60 Min	≥ 60 Min	
2019	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		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of	
	< 05 Min	≥ 05 Min	< 10 Min	≥ 10 Min	< 15 Min	≥ 15 Min	< 20 Min	≥ 20 Min	< 25 Min	≥ 25 Min	< 30 Min	≥ 30 Min	< 35 Min	≥ 35 Min	< 40 Min	≥ 40 Min	< 45 Min	≥ 45 Min	< 50 Min	≥ 50 Min	< 55 Min	≥ 55 Min	< 60 Min	≥ 60 Min	< 60 Min	≥ 60 Min
2020	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		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of					
	≥ 05 Min	< 05 Min	≥ 10 Min	< 10 Min	≥ 15 Min	< 15 Min	≥ 20 Min	< 20 Min	≥ 25 Min	< 25 Min	≥ 30 Min	< 30 Min	≥ 35 Min	< 35 Min	≥ 40 Min	< 40 Min	≥ 45 Min	< 45 Min	≥ 50 Min	< 50 Min	≥ 55 Min	< 60 Min
2021	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	10	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		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of			
	≥ 05 Min	< 05 Min	≥ 10 Min	< 10 Min	≥ 15 Min	< 15 Min	≥ 20 Min	< 20 Min	≥ 25 Min	< 25 Min	≥ 30 Min	< 30 Min	≥ 35 Min	< 35 Min	≥ 40 Min	< 40 Min	≥ 45 Min	< 45 Min	≥ 50 Min	< 55 Min
2022	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		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of			
	≥ 05 Min	< 05 Min	≥ 10 Min	< 10 Min	≥ 15 Min	< 20 Min	≥ 20 Min	< 25 Min	≥ 25 Min	< 30 Min	≥ 30 Min	< 35 Min	≥ 35 Min	< 40 Min	≥ 40 Min	< 45 Min	≥ 45 Min	< 50 Min	≥ 50 Min	< 55 Min	≥ 55 Min	< 60 Min
2023	46	42	128	225	260	234	207	165	123	111	101	76	532									
1	6	5	15	18	27	22	25	14	8	19	10	17	64									
2	1	1	16	22	23	23	14	10	15	11	7	6	64									
3	3	4	9	30	31	23	31	17	9	11	15	7	57									
4	9	0	7	18	21	24	13	9	11	9	12	7	30									
5	5	3	9	12	23	24	9	13	13	5	11	3	29									
6	3	4	11	19	27	22	12	18	8	7	10	7	28									
7	5	6	16	19	22	14	16	9	10	11	4	3	41									
8	6	8	9	25	22	20	22	20	15	12	10	14	68									
9	0	1	8	10	12	14	16	17	5	5	5	3	45									
10	4	3	7	13	16	15	23	12	9	5	6	4	34									
11	4	4	12	24	17	20	12	13	12	8	4	2	43									
12	0	3	9	15	19	13	14	13	8	8	7	3	29									

Year / Month	Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of		Count of			
	≥ 05 Min	< 05 Min	≥ 10 Min	< 10 Min	≥ 15 Min	< 20 Min	≥ 20 Min	< 25 Min	≥ 25 Min	< 30 Min	≥ 30 Min	< 35 Min	≥ 35 Min	< 40 Min	≥ 40 Min	< 45 Min	≥ 45 Min	< 50 Min	≥ 50 Min	< 55 Min	≥ 55 Min	< 60 Min
2024	50	70	110	244	260	266	242	197	165	128	120	84	1206									
1	4	7	9	23	20	16	12	19	9	8	3	5	46									
2	2	1	20	12	19	16	14	17	9	8	10	9	38									
3	4	3	3	28	22	28	9	10	11	8	10	9	39									
4	4	2	14	12	19	19	11	8	13	10	5	1	42									
5	1	5	10	15	14	20	12	7	13	6	7	2	44									
6	5	5	6	15	29	22	16	15	12	10	6	6	56									
7	2	3	11	20	16	22	18	16	11	14	4	10	48									
8	2	5	5	19	20	11	26	17	12	9	6	6	36									
9	3	4	14	28	25	23	24	9	12	13	5	13	39									
10	1	4	7	20	23	29	16	6	12	7	13	8	47									
11	1	6	12	19	15	21	19	7	8	12	10	2	63									
12	2	2	6	21	19	20	17	13	10	11	3	4	39									

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 4**

**FIRE IGNITIONS (MONTHLY)**

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015	0	2	1	7	2	1	4	4	6	4	0	1	32
2	2016	4	3	2	2	0	4	6	1	4	2	2	0	30
3	2017	1	0	0	0	0	6	3	2	4	5	0	2	23
4	2018	0	2	0	4	2	5	4	2	2	3	1	1	26
5	2019	1	0	0	1	0	1	5	2	4	4	3	0	21
6	2020	1	2	0	0	2	3	4	4	8	2	2	1	29
7	2021	0	1	2	0	5	4	6	3	0	1	1	2	25
8	2022	1	0	1	0	4	3	5	2	2	2	0	0	20
9	2023	0	0	0	3	1	1	4	3	0	2	1	1	16
10	2024	1	0	0	1	1	5	7	3	5	4	1	3	31

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

**2024 SAFETY PERFORMANCE METRICS**

**TABLE 5  
GAS DIG-INS  
2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	YTD
1	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
2	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
3	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
4	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
5	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
6	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
7	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
8	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
9	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
10	2024	1.19	1.06	0.97	1.11	1.05	1.17	1.65	1.11	1.16	1.51	0.91	0.79	1.10

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

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 6  
GAS IN-LINE INSPECTION  
2015-2024  
"Miles Inspected"**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual Miles	Annual Percentage
1	2015													5	2%
2	2016													50	22%
3	2017													30	13%
4	2018													0.6	0%
5	2019													25	11%
6	2020													31	14%
7	2021													43	20%
8	2022													0.5	0%
9	2023													31	14%
10	2024													5.5	3%

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.

Note: The historical data provided for this metric has been updated to reflect the number of miles that were assessed through ILI, regardless of the number of tools used for the inspection. In previous reports, the miles reported were a sum of the total miles inspected by each tool type.

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 7**

**GAS IN-LINE UPGRADE**

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual Miles
1	2015													4.71
2	2016													0.99
3	2017													0.00
4	2018													0.04
5	2019													0.83
6	2020													1.26
7	2021													0.03
8	2022													0.00
9	2023													8.00
10	2024													5.50

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.

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 8**

**SHUT IN THE GAS MEDIAN TIME - MAINS**

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	YTD
1	2015													
2	2016													
3	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
4	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
5	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
6	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
7	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
8	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
9	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
10	2024	156.94	596.50	270.64	100.21	421.96	216.65	153.20	182.72	435.53	469.00	630.13	0.00	399.25

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 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
2024	Main	2	0	0	0	2	1	2	3	1	8	77
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

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 9**

**SHUT IN THE GAS MEDIAN TIME - SERVICES**

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													
2	2016													
3	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
4	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
5	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
6	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
7	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
8	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
9	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
10	2024	170.00	127.53	116.13	57.65	88.41	85.47	73.00	104.48	69.38	87.50	100.99	65.03	90.50

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 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
2024	Services	1	1	0	2	8	16	21	15	21	55	282
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

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 10**

**CROSS BORE INTRUSIONS**

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	EOY
1	2015													
4	2016													
7	2017													
10	2018													
13	2019													
16	2020													
19	2021													
22	2022													
25	2023													
28	2024													

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

SDG&E completed its Sewer Lateral Inspection project in 2012.

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 11A**

**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	2015													
2	2016													
3	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
4	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
5	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
6	2020	28.80	27.35	25.80	25.90	27.50	26.25	26.50	26.70	27.10	27.10	28.20	27.20	27.10
7	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
8	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
9	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
10	2024	27.50	25.70	25.20	25.45	25.35	26.35	23.10	25.70	25.45	26.36	25.45	27.20	25.90

**TABLE 11B**

**GAS EMERGENCY RESPONSE TIME**

**2015-2024**

**AVERAGES**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													
2	2016													
3	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
4	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
5	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
6	2020	30.83	30.26	29.15	27.79	30.73	28.04	28.34	28.79	29.38	28.93	30.38	30.19	29.56
7	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
8	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
9	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
10	2024	30.10	28.20	27.00	27.70	27.90	29.00	26.40	26.70	28.00	28.30	27.60	28.70	28.10

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 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.

Please note, during a quality review of the data in the table above, an error was found in the reported data for 2020 in all prior SPMR reports (2020 – 2023). The monthly and annual data in the above tables for 2020 reflects the corrected results.



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 15 minutes	Response time more 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 Gas	SAN DIEGO	1st Operator's Responder On Scene	4578	121	151	344	690	816	754	556	407	276	364	99
		SDG&E	17	0	3	1	3	3	1	2	2	1	0	1
<b>After Business Hours (M-F 1701-0759)</b>														
San Diego Gas	SAN DIEGO	1st Operator's Responder On Scene	1750	47	43	120	225	291	311	210	178	124	163	38
		SDG&E	7	0	0	0	3	3	0	0	0	0	1	0
<b>Weekends/Holidays</b>														
San Diego Gas	SAN DIEGO	1st Operator's Responder On Scene	1626	30	32	104	201	258	225	221	146	117	200	92
		SDG&E	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 15 minutes	Response time more 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 Gas	SAN DIEGO	1st Operator's Responder On Scene	5557	124	151	467	828	932	872	715	489	352	525	102
		SDG&E	32	2	1	5	6	6	3	2	2	3	2	0
<b>After Business Hours (M-F 1701-0759)</b>														
San Diego Gas	SAN DIEGO	1st Operator's Responder On Scene	2117	47	41	142	238	361	300	311	183	160	244	80
		SDG&E	11	0	0	0	1	3	1	3	0	2	1	0
<b>Weekends/Holidays</b>														
San Diego Gas	SAN DIEGO	1st Operator's Responder On Scene	1968	49	36	104	230	315	309	224	207	146	215	133
		SDG&E	7	0	0	1	1	2	1	1	0	0	0	1

**2024 SAFETY PERFORMANCE METRICS REPORT**  
**TABLE 12**  
**NATURAL GAS STORAGE BASELINE INSPECTIONS PERFORMED**  
**2015-2024**

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	2015														
2	2016														
3	2017														
4	2018														
5	2019														
6	2020														
7	2021														
8	2022														
9	2023														
10	2024														

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

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 13**

**GAS SYSTEM INTERNAL INSPECTION STATUS**

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual Miles	Annual Percentage
1	2015													144	63%
2	2016													44	64%
3	2017													143	61%
4	2018													144	62%
5	2019													142	64%
6	2020													142	65%
7	2021													147	68%
8	2022													147	69%
9	2023													157	72%
10	2024													162.5	74%

Metric Description	Total miles of transmission pipelines inspected annually by inline inspection (ILI) and percentage of transmission pipelines inspected annually by inline inspections.
Units	Miles and percentage that can be ILI'd

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 14**

**EMPLOYEE DART RATE**

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	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
2	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
3	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
4	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
5	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
6	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
7	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
8	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
9	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
10	2024	0.56	2.90	0.52	0.76	0.68	0.86	0.75	0.48	0.85	0.23	0.26	0.74	0.80

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.

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 15**

**Rate of EMPLOYEE SIF Actual using CALOSHA Model**

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	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
2	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
3	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
4	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
5	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
6	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
7	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
8	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
9	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
10	2024	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.25	0.02

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 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**

Year	Employee Serious Injuries												Annual	
	January	February	March	April	May	June	July	August	September	October	November	December		
2015	0	0	1	0	0	0	1	0	0	0	0	0	0	2
2016	0	0	0	0	0	0	0	1	0	0	0	0	0	1
2017	0	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	0
2019	1	0	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	0
2021	0	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	0	2
2023	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2024	0	0	0	0	0	0	0	0	0	0	0	1	0	1

Year	Employee Fatalities												Annual	
	January	February	March	April	May	June	July	August	September	October	November	December		
2015	0	0	0	0	0	0	0	1	0	0	0	0	0	1
2016	0	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	0
2018	0	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	0
2020	0	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	0	1
2022	0	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	0
2024	0	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
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
2024	0	0	0	0	0	0	0	0	0	0	0	1	1

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 16**

**Rate of EMPLOYEE SIF Actual using CALOSHA Model**

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													
2	2016													
3	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
4	2018	0.00	0.00	0.00	0.00	0.39	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03
5	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
6	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
7	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
8	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
9	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
10	2024	0.35	0.36	0.00	0.33	0.00	0.00	0.00	0.00	0.00	0.33	0.00	0.00	0.11

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**

Year	Contractor Serious Injuries												Annual	
	January	February	March	April	May	June	July	August	September	October	November	December		
2015	0	0	0	1	0	1	0	0	0	0	0	0	0	2
2016	0	0	0	0	0	0	0	0	1	1	0	0	0	2
2017	0	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	0	1
2019	0	0	0	0	1	0	1	0	0	0	0	0	0	2
2020	0	0	0	0	0	0	0	1	0	1	0	1	0	3
2021	0	0	0	0	0	0	0	0	0	0	1	0	0	1
2022	1	0	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	0	2
2024	1	1	0	1	0	0	0	0	0	0	0	0	0	3

Year	Contractor Fatalities												Annual	
	January	February	March	April	May	June	July	August	September	October	November	December		
2015	0	0	0	0	0	0	0	0	0	0	1	0	0	1
2016	0	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	0
2018	0	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	0
2020	0	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	0
2022	0	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	0
2024	0	0	0	0	0	0	0	0	0	1	0	0	0	1

Contractor SIF Totals													
Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
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
2024	1	1	0	1	0	0	0	0	0	1	0	0	4

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 17**

**RATE OF SIF POTENTIAL - EMPLOYEE**

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													
2	2016													
3	2017													
4	2018													
5	2019													
6	2020													
7	2021			0.46	0.25	0.00	0.00	0.50	0.00	0.82	0.25	0.25	0.36	0.24
8	2022	0.00	0.00	0.00	0.77	0.00	0.00	0.24	0.26	0.24	0.25	0.00	0.00	0.15
9	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
10	2024	0.00	0.00	0.26	0.00	0.23	0.29	0.25	0.24	0.28	0.23	0.00	0.50	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

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 18**

**RATE OF SIF POTENTIAL - CONTRACTOR**

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													
2	2016													
3	2017													
4	2018													
5	2019													
6	2020													
7	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
8	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
9	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
10	2024	0.00	0.00	0.00	0.33	0.00	0.00	0.35	0.29	0.00	0.33	0.00	0.00	0.11

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

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 19**

**CONTRACTOR DART CASE RATE**

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													
2	2016													
3	2017													
4	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
5	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
6	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
7	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
8	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
9	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
10	2024	0.71	0.72	0.60	1.30	0.00	0.31	0.69	0.59	0.67	1.30	0.00	0.85	0.63

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

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 20A**

**PUBLIC SIF**

**2015-2024**

**A) Serious Injuries**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015	0	1	0	0	0	3	0	1	1	0	0	0	6
2	2016	0	0	1	1	0	0	0	0	0	0	0	0	2
3	2017	0	0	0	0	0	0	0	3	0	0	0	1	4
4	2018	0	0	0	0	0	0	2	0	0	0	0	0	2
5	2019	0	0	0	0	0	1	1	0	0	0	0	0	2
6	2020	0	0	0	0	0	1	0	0	1	0	0	1	3
7	2021	0	0	0	0	0	1	0	0	0	1	0	0	2
8	2022	0	0	0	0	0	0	0	0	0	0	0	0	0
9	2023	0	0	0	0	0	0	0	1	0	1	0	0	2
10	2024	1	1	0	0	0	0	0	0	0	0	0	0	2

**TABLE 20B**

**PUBLIC SIF**

**2015-2024**

**B) Fatalities**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015	0	0	0	0	0	0	0	0	0	0	0	0	0
2	2016	1	0	0	0	0	0	0	1	0	0	0	0	2
3	2017	0	0	0	0	0	0	0	0	1	0	0	0	1
4	2018	0	0	0	0	0	0	0	1	0	0	0	0	1
5	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2021	0	0	0	0	0	0	0	0	0	0	0	0	0
8	2022	0	0	0	0	0	0	0	0	0	0	0	0	0
9	2023	0	0	0	0	0	0	0	1	0	0	0	0	1
10	2024	0	0	0	0	0	0	0	0	0	0	1	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 and Fatalities

**2024 SAFETY PERFORMANCE METRICS REPORT**  
**METRIC 21**  
**HELICOPTER/FLIGHT ACCIDENT OR INCIDENT**  
**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													
2	2016	0	0	0	0	0	0	0	0	0	0	0	0	0
3	2017	0	0	1	0	0	0	0	0	0	0	0	0	1
4	2018	0	0	0	0	0	0	0	0	0	0	0	0	0
5	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2021	0	0	0	0	0	0	0	0	0	0	0	0	0
8	2022	0	0	0	0	0	0	0	0	0	0	1	0	1
9	2023	0	0	0	0	0	0	0	0	0	0	0	0	0
10	2024	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 the 49 CFR Section 830.5 "Immediate Notification") per 10,000 flight hours [number of reportable accidents or incidents include here]

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 25A**

**DISTRIBUTION WIRES-DOWN NOT RESULTING IN AUTOMATIC DE-ENERGIZATION**

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015	0	0	0	0	0	0	0	0	0	0	0	0	0
2	2016	0	0	0	0	0	0	0	0	0	0	0	0	0
3	2017	0	0	0	0	0	0	0	0	0	0	0	0	0
4	2018	0	0	0	0	0	0	0	0	0	0	0	0	0
5	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2021	0	0	0	0	0	0	0	0	0	0	0	0	0
8	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%
9	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%
10	2024	0.00%	0.00%	28.57%	33.33%	16.67%	33.33%	50.00%	66.67%	42.86%	37.50%	0.00%	66.67%	32.14%

Metric Description	Distribution System: This metric is defined as the number of occurrences of wires 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

**TABLE 25B**

**TRANSMISSION WIRES-DOWN NOT RESULTING IN AUTOMATIC DE-ENERGIZATION**

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015	0	0	0	0	0	0	0	0	0	0	0	0	0
2	2016	0	0	0	0	0	0	0	0	0	0	0	0	0
3	2017	0	0	0	0	0	0	0	0	0	0	0	0	0
4	2018	0	0	0	0	0	0	0	0	0	0	0	0	0
5	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2021	0	0	0	0	0	0	0	0	0	0	0	0	0
8	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%
9	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%
10	2024	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 wires 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

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 26A  
MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS  
2015-2024**

**Transmission Patrols**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													0.00%
2	2016													0.00%
3	2017													0.00%
4	2018													0.00%
5	2019													0.00%
6	2020													0.00%
7	2021													0.00%
8	2022													0.00%
9	2023													0.00%
10	2024													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.

**TABLE 26B  
MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS  
2015-2024**

**Transmission Inspections**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													0.00%
2	2016													0.00%
3	2017													0.00%
4	2018													0.00%
5	2019													0.00%
6	2020													0.00%
7	2021													0.00%
8	2022													0.00%
9	2023													0.00%
10	2024													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.

**TABLE 26C  
MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS  
2015-2024**

**Distribution Patrols**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													0.00%
2	2016													0.00%
3	2017													0.00%
4	2018													0.07%
5	2019													0.01%
6	2020													0.00%
7	2021													0.00%
8	2022													0.00%
9	2023													0.00%
10	2024													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.

**TABLE 26D  
MISSED INSPECTIONS AND PATROLS FOR ELECTRIC CIRCUITS  
2015-2024**

**Distribution Inspections**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													0.00%
2	2016													0.00%
3	2017													0.00%
4	2018													0.00%
5	2019													0.00%
6	2020													0.00%
7	2021													0.00%
8	2022													0.00%
9	2023													0.00%
10	2024													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.

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 27**

**OVERHEAD CONDUCTOR SIZE IN HIGH FIRE THREAT DISTRICT, TIERS 2 AND 3, (HFTD)**

**2015-2024**

**Percentage of #6 Copper in HFTD**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													
2	2016													
3	2017													
4	2018													
5	2019													
6	2020													
7	2021													
8	2022						8.14%	8.11%	8.06%	8.05%	8.02%	7.98%	7.90%	7.90%
9	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%
10	2024	Note 1	7.68%	7.67%	Note 1	7.66%	7.49%	7.49%	Note 1	7.50%	7.50%	7.48%	7.46%	7.46%

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

Note 1 - SDG&E's Geographical Information System (GIS) system is a live "as-built" system. The total conductor miles and conductor miles of #6 copper in Tier 2 and Tier 3 were inadvertently not retained for the noted 3 months.

**2024 SAFETY PERFORMANCE METRICS REPORT**  
**TABLE 28A**  
**GAS OPERATION CORRECTIVE ACTIONS BACKLOG**  
**2015-2024**  
**GAS DISTRIBUTION**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2	2016	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3	2017	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4	2018	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
5	2019	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
6	2020	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
7	2021	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
8	2022	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
9	2023	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	2024	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

**TABLE 28B**  
**GAS OPERATION CORRECTIVE ACTIONS BACKLOG**  
**2015-2024**  
**GAS TRANSMISSION**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2	2016	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
3	2017	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
4	2018	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
5	2019	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
6	2020	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
7	2021	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
8	2022	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
9	2023	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	2024	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

**2024 SAFETY PERFORMANCE METRICS REPORT**  
**TABLE 29A**  
**GO-95 CORRECTIVE ACTIONS (TIERS 2 AND 3, HFTD)**  
**2015-2024**  
**TRANSMISSION**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													
2	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%
3	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%
4	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%
5	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%
6	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%
7	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%
8	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%
9	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%
10	2024	6.48%	13.43%	1.39%	9.72%	6.48%	4.16%	6.94%	12.04%	10.65%	14.81%	3.70%	9.70%	99.50%

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

**TABLE 29A**  
**GO-95 CORRECTIVE ACTIONS (TIERS 2 AND 3, HFTD)**  
**2015-2024**  
**DISTRIBUTION**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	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%
2	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%
3	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%
4	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%
5	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%
6	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%
7	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%
8	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%
9	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%
10	2024	35.93%	3.54%	7.15%	12.66%	8.33%	3.46%	8.65%	4.01%	4.09%	5.42%	5.66%	0.79%	99.69%

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

**2024 SAFETY PERFORMANCE METRICS REPORT  
TABLE 30A  
GAS TRANSMISSION LARGE OVERPRESSURE EVENTS  
2015-2024**

**Number of Large OP Events**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													
2	2016													
3	2017	0	0	0	0	1	0	0	0	0	0	0	0	1
4	2018	0	0	0	0	0	0	0	0	0	0	0	0	0
5	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2021	0	0	0	0	0	0	0	0	0	0	0	0	0
8	2022	0	0	0	0	0	0	0	0	0	0	0	0	0
9	2023	0	0	0	0	0	0	0	0	0	0	0	0	0
10	2024	0	0	0	0	0	0	0	0	0	0	0	0	0

**2022 SAFETY PERFORMANCE METRICS REPORT  
TABLE 30B  
GAS DISTRIBUTION LARGE OVERPRESSURE EVENTS  
2015-2024**

**Number of Large OP Events**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													
2	2016													
3	2017	0	0	0	0	1	0	0	0	0	0	0	0	1
4	2018	0	0	1	0	1	0	0	0	0	0	0	0	2
5	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2021	0	0	0	0	0	0	0	0	0	0	0	0	0
8	2022	0	0	0	0	0	0	0	0	0	0	0	0	0
9	2023	0	0	1	0	0	0	0	0	0	0	0	0	1
10	2024	0	0	0	0	0	0	0	0	0	0	0	0	0

Metric Description	CPUC-reportable overpressure events are those that met the conditions specified in GO112-F, 122.2(d)(5), but reported on same frequency as the other SPMs. Separate metrics are provided for distribution and transmission systems. The metric measures both gas operational performance and the integrity of gas pipelines.
Units	Number of occurrences

**2024 SAFETY PERFORMANCE METRICS REPORT**

**TABLE 31**

**GAS IN-LINE INSPECTIONS MISSED**

**2015-2024**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015	0	0	0	0	0	0	0	0	0	0	0	0	0
2	2016	0	0	0	0	0	0	0	0	0	0	0	0	0
3	2017	0	0	0	0	0	0	0	0	0	0	0	0	0
4	2018	0	0	0	0	0	0	0	0	0	0	0	0	0
5	2019	0	0	0	0	0	0	0	0	0	0	0	0	0
6	2020	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2021	0	0	0	0	0	0	0	0	0	0	0	0	0
8	2022	0	0	0	0	0	0	0	0	0	0	0	0	0
9	2023	0	0	0	0	0	0	0	0	0	0	0	2	2
10	2024	0	0	0	0	0	0	0	0	0	0	0	0	0

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

The data for 2022 has been corrected from two inspections to zero; these inspections were previously reported as missed but were completed within the 6-month extension period authorized under 49 CFR § 192.939.  
 The data for 2023 has been corrected to exclude an inspection that was performed through a non-ILI assessment method.

**2024 SAFETY PERFORMANCE METRICS REPORT**  
**TABLE 32**  
**OVERHEAD CONDUCTOR SAFETY INDEX (ANNUAL)**  
**2015-2024**

**A) TRANSMISSION**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													
2	2016													
3	2017													
4	2018													
5	2019													
6	2020													
7	2021													
8	2022													0.00
9	2023													0.00
10	2024													0.00

**B) DISTRIBUTION**

Line No.	Year	January	February	March	April	May	June	July	August	September	October	November	December	Annual
1	2015													
2	2016													
3	2017													
4	2018													
5	2019													
6	2020													
7	2021													
8	2022													11.77
9	2023													14.56
10	2024													10.08

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
Units	Number of occurrences per circuit mile per circuit mile