

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

Order Instituting Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities.	R.20-07-013 (Filed July 16, 2020)
(Not Consolidated)	
Application of San Diego Gas & Electric Company (U 902 M) to Submit Its 2021 Risk Assessment and Mitigation Phase Report.	A.21-05-011 (Filed May 17, 2021)
And Related Matter.	A.21-05-014 (Consolidated)
Application of Southern California Gas Company (U 904 G) for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2024.	A.22-05-015 (Filed May 16, 2022)
And Related Matter.	A.22-05-016 (Consolidated)

**2024 SAFETY PERFORMANCE METRICS REPORT OF
SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)**

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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), Southern California Gas Company (SoCalGas) timely submits its annual Safety Performance Metrics Report (2024 SPMR).¹ This 2024 SPMR reports on the applicable 32 safety performance

¹ 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



2024 Safety Performance Metrics Report

March 28, 2025

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2024 Safety Performance Metrics Report
March 29, 2025

I. INTRODUCTION/OVERVIEW

Southern California Gas Company (SoCalGas 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).¹ The S-MAP Phase Two Decision requires the California investor-owned utilities (IOUs), including SoCalGas, 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 initial SPMs, and adopted new metrics. The Risk OIR Phase One Decision directed the IOUs to adhere to the guidance on the submittal of SPMs adopted in the S-MAP Phase Two Decision when making the annual SPM report

¹ 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. SoCalGas will also concurrently email the Safety Performance Metric report to RASA_Email@cpuc.ca.gov.

submissions. This means the IOUs will report on the applicable original SPMs, as modified by the Risk OIR Phase One Decision.² In accordance with both D.19-04-020 and D.21-11-009, SoCalGas reports herein on the 20 applicable SPMs³ 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).⁴

SoCalGas defines safety as the presence of controls for known hazards, actions to anticipate and guard against unknown hazards, and the commitment to continuously improve its ability to recognize and mitigate hazards. Safety requires strong, ongoing leadership commitment, and active engagement and ownership from all employees. SoCalGas focuses on safety through the lens of public safety,⁵ infrastructure safety,⁶ employee safety,⁷ and contractor safety.⁸ SoCalGas uses safety-related metrics as part of its risk-informed decision-making and continuous improvement processes. Tracking and analyzing both leading and lagging indicators

² Not all metrics adopted in D.19-04-020 and D.21-11-009 are applicable to SoCalGas.

³ D.21-11-009 at Appendix B.

⁴ 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. SoCalGas'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 SoCalGas's Safety Performance Metrics Reports containing the revised metrics.

⁵ Safety systems and processes focused on protection of our customers and the public (*i.e.*, Emergency Management, Environmental Safety, Customer Data Privacy, Accessibility, and protection of the public from harm caused by our operations or our assets, and the safety of vulnerable populations).

⁶ Safety systems and processes associated with the design, construction, operation, inspection, and maintenance of SoCalGas's infrastructure.

⁷ Safety systems and processes focused on the health and safety of our employees. This includes safety policies, programs, and training.

⁸ Safety systems and processes focused on the safety and protection of our contractors and subcontractors who provide services to support SoCalGas assets and operations.

and comparing historical results provides a point of reference for safety processes and helps identify opportunities for continuous improvement.

While SoCalGas has been tracking many leading and lagging safety-related metrics for numerous years, 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, differs 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. SoCalGas notes these instances within each metric narrative included in Section V below. SoCalGas tracks the Safety Performance Metrics adopted by the Commission and will 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 on an ongoing basis.⁹

A. Compliance with S-MAP Phase Two Decision and Risk OIR Phase One Decision Directives

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 enhanced training, and (2) explain whether any linkage to financial incentives creates a potential for bias in individual metrics. Sections II.B. and II.C. below provide additional detail on these requirements.

For the Public Serious Injuries and Fatalities (Pub-SIF), Metric No. 20, the S-MAP Phase Two Decision requires the IOUs to provide Commission staff with their Pub-SIF data 60 days

⁹ While the Safety Performance Metrics Report requires SoCalGas 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, SoCalGas will note the modification in succeeding Safety Performance Metric Reports.

prior to the due date for each annual Safety Performance Metrics Report.¹⁰ Accordingly, SoCalGas provided the SPD with a preview of its Pub-SIF data on January 30, 2025. After review of SoCalGas’s draft Pub-SIF data, SPD informed SoCalGas on March 5, 2025, that there were no changes to the Pub-SIF subcategories for final reporting in this Safety Performance Metrics Report.¹¹

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, 20 apply to SoCalGas and are included in this Report. In addition to the data for the 20 metrics included in Attachment B, SoCalGas 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 Safety Metrics Adopted in D.19-04-020 and D.21-11-009¹²

Category	Risk(s)	Metric Name	Units	2024
Gas	Transmission Pipeline Failure - Rupture with Ignition; Distribution Pipeline Rupture with Ignition (non-Cross Bore); Catastrophic Damage involving Gas Infrastructure (Dig-	5. Gas Dig-in	The number of 3rd party gas dig-ins per 1,000 USA tags/tickets	2.09

¹⁰ D.19-04-020 at 19.

¹¹ E-mail from Anwar Safvi, SPD staff, to SoCalGas representative (March 5, 2025).

¹² 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, 20 are applicable to SoCalGas and are included herein. Ten years of monthly historical data, where available, is provided in the accompanying Excel file labeled Attachment B.

Category	Risk(s)	Metric Name	Units	2024
	Ins)			
	Catastrophic Damage Involving High-Pressure Pipeline Failure	6. Gas In-Line Inspection (“ILI”)	Miles Inspected ¹³ and percentage inspected by ILI.	348 (10%)
	Catastrophic Damage Involving High-Pressure Pipeline Failure	7. Gas In-Line Inspection Upgrade	Miles of gas transmission lines upgraded annually to permit inline inspections.	15.48
	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	442
	Distribution Pipeline Rupture with Ignition (non-Cross Bore)	9. Gas Shut-In Time – Services	(Median) response time in minutes required to stop the flow of gas for Distribution Services	194.30
	Catastrophic Damage Involving Medium Pressure Pipeline Failure	10. Cross Bore Intrusions	Number of cross bore intrusions per 1,000 inspections	1.03
	Distribution Pipeline Rupture with Ignition	11. Gas Emergency Response	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.	26.91/20
	Gas Storage	12. Natural Gas Storage Baseline	Percentage (Number of Assessments	100%

¹³ 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
		Inspections Performed	completed/Number scheduled or targeted)	
	Catastrophic Damage Involving High-Pressure Pipeline Failure	13. Gas Pipelines That Can Be Internally Inspected ¹⁴	Total Miles and Percentage	2342 (70%)
Injuries	Employee Safety	14. Employee Days Away, Restricted and Transfer (DART) Rate	DART Cases times 200,000 divided by employee hours worked	1.90
	Employee Safety	15. Employee Serious Injuries and Fatalities Rate	Number of SIF- Actual cases among employees x 200,000/employee hours worked	0.01
	Contractor Safety	16. Rate of SIF - Actual (Contractor)	Number of SIF- Actual cases among contractors x 200,000/contractor hours worked	0
	Employee Safety	17. Rate of SIF - Potential (Employee)	Number of SIF- Potential cases among employees x 200,000/employee hours worked	0.08
	Contractor Safety	18. Rate of SIF - Potential (Contractor)	Number of SIF- Potential cases among contractors x 200,000/contractor hours worked	0.08
	Contractor Safety	19. Contractor Day Away, Restricted Transfer (DART)	DART Cases times 200,000 divided by contractor hours worked.	0.08
	Public Safety	20. Public Serious Injuries and Fatalities	Number of Serious Injuries/ Fatalities	0/0

¹⁴ SoCalGas and San Diego Gas & Electric Company (SDG&E) own and operate an integrated natural gas system. This metric represents the percentage of the gas system that can be internally inspected, otherwise known as in-line inspection or “pigging.” All of SoCalGas’ transmission pipeline is inspected in accordance with 49 Code of Federal Regulations (CFR) Section (§) 192, Subpart O, which identifies in-line inspection, pressure test, and direct assessment.

Category	Risk(s)	Metric Name	Units	2024
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
Gas	Gas safety	28. Gas Operation Corrective Actions Backlog	Percentage of work orders past due for completion in the past calendar year (Distribution/ Transmission)	0%/0%
	Gas Transmission and Distribution	30. Overpressure Events	Number of occurrences (Distribution/Transmission)	3/1
	Gas Transmission	31. Gas In-Line Inspections Missed	Number of Missed Inspections	0

B. Examples of Efforts to Improve Safety Performance

According to the Commission, “a key objective in adopting S-MAP safety metrics is not just tracking but improving [the] utilities’ safety performance.”¹⁵ As part of achieving this objective, the S-MAP Phase Two Decision requires the IOUs to “Provide three to five examples of how the utility has used Safety Performance Metrics (metrics) data to improve staff and/or contractor training, and/or to take corrective actions to minimize top risks or risk drivers.”¹⁶ Below are four examples of recent initiatives to enhance safety and further reduce risk.

1. Example 1: Leveraging Gas Dig-in Data (Metric 5)

SoCalGas leverages gas dig-in data to understand the root causes of dig-ins. With that information, the team managing outreach can determine how to better educate and train excavators to improve safe practices. Dig-in data is collected and reviewed to determine primary

¹⁵ D.19-04-020 at 28.

¹⁶ *Id.* at 63 (OP 6D).

locations, the type of work being performed, who is performing the work, and for whom the work is being performed. With this data, SoCalGas narrows the focus of outreach efforts, community awareness, and programs to assist in reducing the lack of 811 notifications. SoCalGas works directly with city officials involved with construction activities within their jurisdiction to raise public awareness in an effort to (1) educate city personnel on the specific requirements of the California safe excavation laws, (2) help officials understand their role in enforcing the laws by promoting the use of 811 USA for excavation tickets (through their project review and permitting activities and through field inspection their employees perform), and (3) explain potential cost savings to the city. Beginning in July 2023, SoCalGas began a collaborative partnership with California's Underground Safety Board to develop a streamlined process to report dig-ins that occur with no 811 notifications. In 2024 and continued this year, the Underground Safety Board now reviews and assesses safety training and fines as deemed appropriate.

Dig-in data shows excavation damages still occurring even following an 811 notification in some instances. Through investigation, root causes are identified, and there is communication with damaging parties to offer safety outreach. In addition, the data gathered through his process is used to focus resources and efforts toward work types and areas where an increase in outreach and communication is anticipated to have greater potential risk mitigation benefits.

2. Example 2: Gas Shut-in Time – Mains Metric Used to Determine Corrective Actions (Metric 8)

SoCalGas leverages Metric No. 8: Gas Shut-In Time-Mains to analyze data and drive improvements. This metric measures the duration it takes to shut off gas mains during incidents, which is crucial for safety and operational efficiency.

By analyzing shut-in times, SoCalGas's Gas Distribution, Dispatch, and other

departments can pinpoint areas where response times are lagging. This allows for targeted coaching and training to enhance overall performance and ensure quicker shut-in times in future incidents. The metric has been instrumental in refining SoCalGas's new Off-Hour Shift district deployment. By comparing shut-in times before and after the implementation of this shift, SoCalGas can demonstrate improved response times, leading to better gas control and safety during off-hours.

The data from this metric informs decisions on resource allocation. For example, if certain areas consistently show longer shut-in times, additional resources can be allocated to those areas to improve response times. This strategic allocation helps in optimizing overall operational efficiency and safety. Trends identified through this metric provide valuable insights into recurring issues or patterns. These insights are then used to inform SoCalGas's decision-making process for gas control. For instance, if a trend shows that certain types of incidents result in longer shut-in times, SoCalGas can develop specific protocols to address these scenarios more effectively.

3. Example 3: Learning Team Informed by Employee DART Rate Metric (Metric 14)

Learning Teams is a process consisting of discovery, reflection, problem solving, identifying opportunities, and implementation. One of the Learning Teams conducted in 2024 was on SoCalGas's Winning 7 program, which was a 2023 initiative launching seven safety habits aimed at preventing employee injuries while working. Metric No. 14 Employee Days Away, Restricted Transfer (DART) is calculated by employee recordable injuries resulting in Days Away from work and/or Days on Restricted Duty or Job Transfer. The DART-related Learning Team provided an opportunity for employees to engage in the learning process and foster a deeper understanding of the issue at hand by going above and beyond, for instance, what

a traditional incident evaluation might provide. This Learning Team resulted in various recommendations to enhance processes and procedures, such as leveraging the input and feedback from Safety Committees across SoCalGas districts; providing safety orientation efforts around the Winning 7; collaborating with local management on the Winning 7; rebranding suggestions; building time into the morning for Winning 7; providing education about metrics and awareness of tools; and rethinking the ongoing rollout of the Winning 7 to reinforce, teach, encourage, and educate. SoCalGas plans to continue deploying Learning Teams to engage employee feedback, continuously improve and identify opportunities to enhance safety management practices. The safety performance metrics will continue to inform the selection and prioritization of Learning Teams in the future.

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

The S-MAP Phase Two Decision requires each IOU to summarize and provide three to five examples of how the IOU uses Safety Performance Metrics Report data to support risk-based decision making.

1. Example 1: Cross Bore Intrusion Data Used to Inform Mitigation (Metric 10)

The Cross Bore Intrusion metric confirms, through continued identification and remediation of cross bores, that this continues to be an integrity risk to the SoCalGas distribution system. A “cross bore” can occur if the installation of gas pipe inadvertently crosses a sewer line (or “lateral”) and penetrates, or bores, through the sewer line. To identify potential areas where cross bores may have occurred, a comprehensive review of construction documents is performed. Through this review of records, SoCalGas identifies areas to be inspected and schedules and prioritizes those inspections. The consistent rate of cross bores identified in the preceding years of this project supports the continued level of resource allocation and demonstrates the

effectiveness of this activity and its contribution to safety.

2. Example 2: Gas Overpressure Event Metric Informs Potential Mitigation (Metric 30)

SoCalGas uses advanced over-pressure event monitoring systems to promote pipeline safety by detecting and responding to pressure anomalies in real-time. These systems employ pressure sensors and automated controls to activate safety mechanisms like automated shut-off and remote-control valves, preventing potential failures. Additional sites monitor pressure for abnormal conditions and send alarms for field response. Data from these systems informs comprehensive risk mitigation strategies, including regular maintenance, risk assessments, and emergency response training. By integrating these technologies and adhering to regulatory standards, SoCalGas effectively manages over-pressure risks, safeguarding both the public and the environment. SoCalGas, through its Control Center Modernization program is further digitalizing its pipeline infrastructure to enhance system safety. By expanding remote monitoring and control capabilities across its service territory, including the identification of overpressure events in real-time, SoCalGas can respond to system events more quickly. For select district regulator stations on the Distribution pipeline network, infrastructure enhancements provide pressure sensor and control technology. This technology can activate safety mechanisms like remote-control valves and/or automatic slam-shut valves, preventing potential failures.

In addition, SoCalGas is integrating more than 2,000 existing electronic pressure monitors (EPMs) with Gas Control to provide a more comprehensive view of the overall gas system, further enabling centralized and integrated system monitoring to identify and respond to abnormal operating conditions. Data from these systems will also inform comprehensive risk assessments and mitigation strategies, planning for regular maintenance, and emergency

response training. By integrating these technologies, SoCalGas can more effectively manage overpressure risks, safeguarding its infrastructure, its employees, the public, and the environment.

3. Example 3: Well Assessment Intervals (Metric 12)

SoCalGas uses the data associated with Metric 12 to evaluate the progress of implementing risk-based decision making for well assessment intervals. In alignment with a Pipeline and Hazardous Materials Safety Administration (PHMSA)-funded study focused on well entry risk, SoCalGas has identified well intervention as an applicable threat to gas storage wells, with safety and environmental consequences. Intervention, in this context, refers to activities, such as monitoring, inspection, and repairs, that involve entering the well with tools or equipment and often require temporary removal or reconfiguration of well barriers. SoCalGas attempts to balance the threats of active downhole metal loss (which can be identified and mitigated through inspections) and well entry by proposing well-specific inspection frequencies that are based on an understanding of the extent of any metal loss gathered from inspections and the rate of degradation estimated by comparing the size of matched anomalies at different points in time.

Current California Geologic Energy Management Division (CalGEM) regulations for California operators require wall thickness inspections on well casings “at least once every 24 months to determine if there are possible issues with casing integrity,” with the stipulation that CalGEM “may approve a less frequent casing wall thickness inspection schedule for a well if the operator demonstrates that the well’s corrosion rate is low enough that biennial inspection is not necessary.” To mitigate the risk associated with prescriptive, frequent well intervention, but also recognizing that downhole conditions may warrant inspection, SoCalGas submits well specific inspection interval requests, which CalGEM can either approve, approve at an interval different

from SoCalGas' proposal, or deny.

III. EXECUTIVE COMPENSATION AND BIAS CONTROLS – OVERVIEW (D.19-04-020, ORDERING PARAGRAPH 6A-C)

A. Executive Incentive Compensation

SoCalGas uses compensation metrics and key performance indicators to promote its safety culture and 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.”¹⁷ Benefits programs that support employee health and welfare also contribute to SoCalGas’s safety performance and culture.

In SoCalGas’s TY 2024 GRC testimony, Compensation and Benefits witness Debbie Robinson explained how SoCalGas’s compensation and benefits programs are designed to focus employees on safety and that SoCalGas continues to emphasize employee and operational safety measures in their variable pay plans, commonly referred to as the Incentive Compensation Plans (ICP).¹⁸ Providing continued alignment between SoCalGas’s safety programs and the ICP strengthens the Company’s safety culture and reinforces to employees that safety is a core value of SoCalGas.

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.”¹⁹ In the narrative accompanying each Safety Performance Metric, SoCalGas indicates whether that specific metric is linked to or used to determine executive compensation levels and/or incentives (*see* Section V, below). For this 2024 Safety Performance Metrics Report, SoCalGas references

¹⁷ D.16-06-054 at 153.

¹⁸ A.22-05-015/016 (cons.), Ex. SCG-25-R-E/SDG&E-29-R-E (Robinson) at DSR-11.

¹⁹ D.19-04-020 at 63 (OP 6A).

its 2024 Executive ICP²⁰ and 2024 non-executive ICP and indicates whether each metric was tied to these incentive plans in 2024. Since this is an annual submission, SoCalGas 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.

SoCalGas's executive compensation structure is intended to focus executives on SoCalGas's key objectives and priorities, for which safety is foundational. The primary components of SoCalGas'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 SoCalGas'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 each executive officer's base salary. SoCalGas has increased the weighting of safety measures in variable pay plans over the past years such that safety-related measures currently comprise 60% of SoCalGas's 2024 Executive Incentive Compensation Plan. These safety-related measures broadly include factors related to contractor, public, employee, and infrastructure or pipeline safety, as further detailed in the Bias Controls section of each applicable metric. Performance measures are reviewed and updated annually.

The SoCalGas compensation component that comprises “executive incentive compensation” is Variable Pay. Safety measures or goals are an important focus of SoCalGas's

²⁰ For purposes of the SPMR 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.

Variable Pay, as reflected in the safety performance goals falling under the “Safety Management System” category in SoCalGas’s 2024 Executive and non-executive Incentive Compensation Plans. These performance goals and measures, as further described in each applicable metric in Section V below, are designed to incentivize employees and executives to meet specified safety targets. Safety measures in Variable Pay plans apply to all non-represented employees. The ICP targets for goals within the Safety Management System category are the same for every non-represented employee, regardless of their role in the Company.

SoCalGas’s Board of Directors determines safety performance measures and the targets to be included in each year’s incentive plan and reviews and approves the results. The SoCalGas 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 in the event of a serious incident.

There are no guaranteed monetary incentives in SoCalGas’s Executive and non-executive ICPs. In years in which performance goals such as safety goals are not met, Variable Pay is reduced or not paid at all.

B. Bias Controls

Regularly scheduled internal audits are also 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 consulting with SoCalGas 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 SoCalGas management and 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 SoCalGas's processes and business controls, as designed and maintained by SoCalGas management, are adequate and functioning in a manner to help confirm 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. SoCalGas 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 of SoCalGas's management and the Board of Directors as to the adequacy of the Company's overall system of business control. SoCalGas management addresses identified deficiencies by Audit Services and develops 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.”²¹ SoCalGas’s 2024 Executive ICP and 2024 non-executive ICP each include 12 separate safety-related performance measures.²² These safety-related performance measures comprise a mixture of leading and lagging measures and span all lines of business – thus covering employee, customer, public, and infrastructure safety – to prevent bias. Bias controls for specific metrics included in this Safety Performance Metrics Report with an ICP component are discussed in each metric section below. Moreover, SoCalGas’s inclusion of 12 separate safety-related performance metrics within the ICP generally serves as its own control because the achievement of a metric, according to a pre-established definition subject to an 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 SoCalGas’s annual ICP results and calculations prior to SoCalGas Board approval, which includes examining whether financial and operational goal results included in the ICP calculations are approved by the responsible officer and supported with documentation. Each safety-related performance metric is well defined in the approved annual ICP plan. The annual ICP plan further specifies 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 SoCalGas’s RAMP and GRC Safety Goals

As described in SoCalGas’s TY 2024 GRC testimony, the Company’s comprehensive

²¹ D.19-04-020 at 63 (OP 6C).

²² For the period of January 1, 2024, to December 31, 2024, SoCalGas 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.” SoCalGas directors are covered by SoCalGas’s Incentive Compensation Plan (*i.e.*, the “2024 non-executive Incentive Compensation Plan”). Therefore, SoCalGas refers to both the 2024 Executive Incentive Compensation Plan and the 2024 Incentive Compensation Plan herein.

approach to enterprise risk management is an integral part of SoCalGas's SMS and supports and informs the Commission's Risk-Based Decision-Making Framework, a key component of which is the GRC.²³ In its TY 2019 GRC testimony, SoCalGas stated that it would continue to expand the use of probabilistic models, data and quantification and explore areas where further quantification will be helpful in addressing other enterprise-level risks.²⁴ SoCalGas has progressed on that trajectory, further integrating risk, asset, and investment management into the Company's safety culture.

Consistent with this progression, SoCalGas described its RAMP process to identify top risks, inventory current controls, and then influence and drive continuous learning and improvement for each identified risk to improve safety and risk mitigation.²⁵ This overarching goal and approach is best described as an ongoing process whereby the Company identifies top risks and then uses data to identify controls and mitigations to improve SoCalGas's public, infrastructure, employee and contractor safety. The metrics identified in this report demonstrate progress, learnings, and ongoing challenges in these areas by documenting leading and lagging metrics that show progress in: (1) identifying, implementing, and maintaining effective safety controls for known hazards (*e.g.*, reducing lagging metrics related to incidents); (2) anticipating and guarding against potential and unknown hazards (*e.g.*, increasing leading indicators that demonstrate action to validate safety and respond to and learn from potential incidents); and (3) enhancing the Company's capability to recognize and mitigate hazards (*e.g.*, focusing on enhancing learning and continuous improvement capabilities).

²³ A.22-05-015/016 (cons.), Ex. SCG-03, Chapter 1 (Ng) at DMN-3.

²⁴ A.17-10-007/008 (cons.), Ex. SCG-02-R/SDG&E-02-R, Chapter 1 (Day) at DD-26.

²⁵ See A.21-05-014, RAMP Overview and Approach Chapter (SCG/SDG&E-RAMP-A) at A-4.

B. High-level Summary of SoCalGas’s Total Estimated Risk Mitigation Spending Level as Approved in the TY 2024 GRC

D.14-12-025 directs IOU to explain how IOU risk mitigation activities and spending are meeting the goals for managing and minimizing the risks identified in the utility’s RAMP and GRC submissions.²⁶ 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,”²⁷ 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.”²⁸ At this time, RMAR is within the scope of Phase 4, Track 1 of the RDF Proceeding.²⁹

SoCalGas filed its TY 2024 GRC Application on May 16, 2022.³⁰ Among other things, SoCalGas’s GRC Application included requests related to mitigating its key safety risks and integrated the results from its RAMP filed on May 17, 2021 (2021 RAMP).³¹ SoCalGas’s 2021 RAMP filing significantly informed the TY 2024 General Rate Case results.³² The below tables provide a high-level summary of SoCalGas’s total estimated risk mitigation spending as presented in the 2021 RAMP filing and approved in the TY 2024 GRC, D. 24-12-074 (2024 GRC Decision).

²⁶ D.14-12-025 at 46.

²⁷ D.19-04-020 at 32.

²⁸ *Id.*

²⁹ See R.20-07-013, Assigned Commissioner’s Phase 4 Scoping Memo and Ruling (September 13, 2024) at 7-8.

³⁰ A.22-05-015, Application of Southern California Gas Company (U904G) for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2024 (May 16, 2022).

³¹ A.21-05-014, Application of Southern California Gas Company (U904G) to Submit Its 2021 Risk Assessment and Mitigation Phase Report (May 17, 2021).

³² Similarly, pursuant to D.20-01-002, Appendix B at B-1, SoCalGas filed its 2021 RAMP application on May 17, 2021, informing of its TY 2024 GRC, which was filed on May 16, 2022.

The TY 2024 GRC Decision was approved by the Commission on December 19, 2024.³³ The TY 2024 GRC Decision did not explicitly distinguish between authorized funding of RAMP activities versus non-RAMP activities. Therefore, for purposes of determining TY 2024 GRC authorized amounts (based on SoCalGas’s 2021 RAMP submission), it was necessary for SoCalGas to impute authorized amounts for some RAMP mitigation activities. Similarly, internal cost tracking mechanisms at SoCalGas do not necessarily track costs by RAMP mitigation activity or risk. Rather, SoCalGas records costs to operations and maintenance (O&M) cost centers and to various capital budget codes, aligned with its GRC presentations. This SPMR reflects SoCalGas’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 SoCalGas and SDG&E can maintain the safety, reliability, and efficiency of their natural gas transmission, distribution, and storage systems and electrical distribution systems. This will enable them to continue providing their customers with safe and reliable energy services while maintaining reasonable rates.”³⁴ 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.”³⁵

D.19-04-020 directs the IOUs to include a “high-level summary of their total estimated risk mitigation spending level as approved in their most recent GRC.”³⁶ SoCalGas 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

³³ D.24-12-074.

³⁴ *Id.* at 5.

³⁵ *Id.* at 52.

³⁶ D.19-04-020 at 32.

were accounted for which may not align with its GRC presentation.³⁷ SoCalGas provides preliminary values in the table below, as efforts to compile and finalize SoCalGas’s 2024 Risk Spending Accountability Report (RSAR) are currently underway. Once finalized and filed, SoCalGas’s 2024 RSAR will provide comprehensive detail on O&M spending activities presented in SoCalGas’s 2021 RAMP Report and TY 2024 GRC proceeding, including variance explanations for those activities/programs that meet the CPUC’s variance criteria threshold.³⁸

Table 2 - SoCalGas Preliminary Total Risk Mitigation Spending: O&M

SoCalGas O&M Details (2024 Direct \$000)					
RAMP Chapter	RAMP Risk Description	2024 Actuals	2024 Imputed Authorized	\$ Variance	% Variance
SCG-01	Incident Related to the High-Pressure System (Excluding Dig-in)	232,362	192,624	39,738	21%
SCG-02	Excavation Damage (Dig-In) on the Gas System	32,330	31,682	648	2%
SCG-03	Incident Related to the Medium-Pressure System (Excluding Dig-in)	209,406	237,043	(27,637)	-12%
SCG-04	Incident Related to the Storage System (Excluding Dig-in)	69,816	71,253	(1,437)	-2%
SCG-05	Incident Involving an Employee	9,019	8,146	874	11%
SCG-06	Cybersecurity	8,586	4,392	4,194	95%
SCG-07	Incident Involving a Contractor	326	586	(260)	-44%
CFF-1	Asset and Records Management	11,407	12,752	(1,345)	-11%

³⁷ For this reason, Tables 2 and 3 of this 2024 SPMR should be read in conjunction with SoCalGas’s 2024 Risk Spending Accountability Report, which will be filed on May 30, 2025.

³⁸ On February 21, 2025, Energy Division's Director approved an extension request from SoCalGas & SDG&E. The RSAR filing date was extended to May 30, 2025. As a result, the authorized and recorded O&M spending activities for SoCalGas’s 2024 RSAR are preliminary and may change as the costs are finalized in the 2024 RSAR.

SoCalGas O&M Details (2024 Direct \$000)					
RAMP Chapter	RAMP Risk Description	2024 Actuals	2024 Imputed Authorized	\$ Variance	% Variance
CFF-2	Energy Resilience	8,387	11,391	(3,004)	-26%
CFF-3	Emergency Preparedness and Response and Pandemic	2,388	2,594	(206)	-8%
CFF-4	Foundational Technology Systems	13,980	10,938	3,042	28%
CFF-5	Physical Security	3,754	1,514	2,240	148%
CFF-6	Safety Management System	7,483	9,024	(1,541)	-17%
CFF-7	Workforce Planning / Qualified Workforce	853	2,665	(1,812)	-68%
	Total SoCalGas RAMP	610,097	596,604	13,493	2%

SoCalGas’s 2021 RAMP Report forecasted RAMP activities for years 2022 through 2024.

SoCalGas’s TY 2024 GRC presented capital forecasts for the GRC cycle (*i.e.*, 2022-2024).³⁹

SoCalGas manages its capital projects over the GRC cycle, rather than on a year-by-year basis.

Further, D.20-01-002 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.”⁴⁰ Reprioritizing spending allows utilities to “[r]espond to immediate or short-term crises outside of the RAMP and GRC process,”⁴¹ in accordance with Commission directives. As the Commission has stated: “RAMP and GRCs...are not designed to address immediate needs; the utilities have responsibility for addressing safety regardless of the GRC cycle.”⁴² With the TY 2024 GRC Decision, SoCalGas

³⁹ In January 2020, D.20-01-002 (Rate Case Plan Decision) at 52, extended the GRC cycle for each large California IOU from three to four years.

⁴⁰ D.20-01-002 at 38.

⁴¹ D.18-04-016 at 6 (citing D.16-08-018 at 151-152).

⁴² D.16-08-018 at 152.

began executing new and/or incremental programs presented during the TY 2024 GRC proceeding (and emergent activities that were not identified in the TY 2024 GRC).

Table 3 - SoCalGas Preliminary Total Risk Mitigation Spending: Capital

SoCalGas Capital Details (2024 Direct \$000)					
RAMP Chapter	RAMP Risk Description	2024 Actuals	2024 Imputed Authorized	\$ Variance	% Variance
SCG-01	Incident Related to the High-Pressure System (Excluding Dig-in)	444,188	402,623	41,565	10%
SCG-02	Excavation Damage (Dig-In) on the Gas System	6,304	3,129	3,175	101%
SCG-03	Incident Related to the Medium-Pressure System (Excluding Dig-in)	288,076	189,952	98,124	52%
SCG-04	Incident Related to the Storage System (Excluding Dig-in)	176,055	110,240	65,815	60%
SCG-05	Incident Involving an Employee	12,379	5,605	6,774	121%
SCG-06	Cybersecurity	26,096	47,075	(20,979)	-45%
CFF-1	Asset and Records Management	22,030	15,986	6,044	38%
CFF-2	Energy Resilience	3,913	4,189	(276)	-7%
CFF-4	Foundational Technology Systems	178,504	108,473	70,031	65%
CFF-5	Physical Security	0	2,210	(2,210)	-100%
	Total SoCalGas RAMP	1,157,547	889,482	268,065	30%

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.⁴³ 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, SoCalGas provides an explanation and is collecting such data on a prospective basis for inclusion in future Safety Performance Metrics Reports.

A. Metric No. 5: Gas Dig-In

Metric Name and Description per D.21-11-009:⁴⁴ “Gas Dig-in: The number of 3rd party gas dig-ins per 1,000 Underground Service Alert (USA) tags/tickets for gas. A gas dig-in refers to any damage (impact or exposure) that results in a repair or replacement of underground gas facility as a result of an excavation. Excludes fiber and electric tickets. A third-party dig-in is damage caused by someone other than the utility or a utility contractor.”

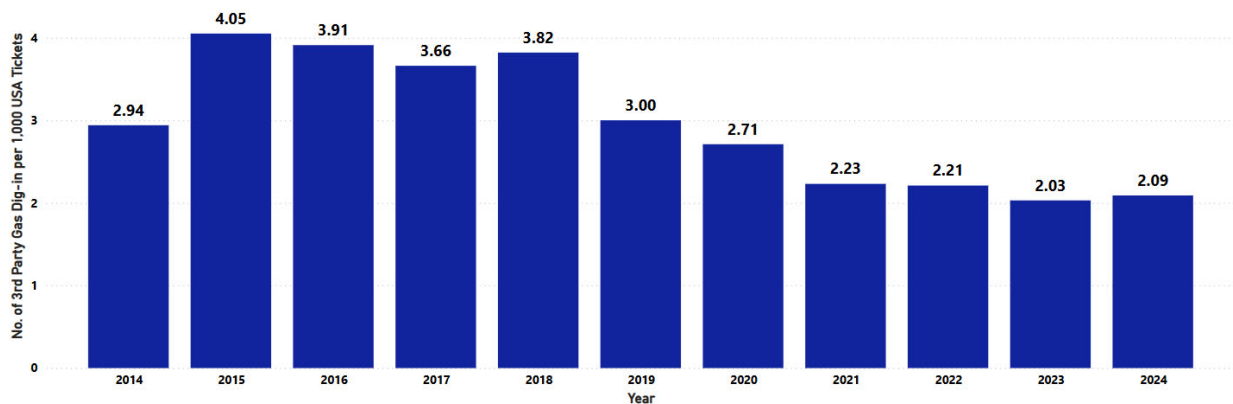
Risk(s): (1) Transmission Pipeline Failure - Rupture with Ignition, (2) Distribution Pipeline Rupture with Ignition (non-Cross Bore), (3) Catastrophic Damage involving Gas Infrastructure (Dig-Ins).

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)



⁴³ As discussed *supra* at 1, SoCalGas 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.

⁴⁴ The metric name and description, risks, category, and units for each metric comes directly from the language in D.21-11-009, Appendix B.

Metric Background:

Under California law,⁴⁵ a third-party planning excavation work is required to contact the Regional Notification Center for their area, also known as 811 or Underground Service Alert (USA), at least two (2) full working days prior to the start of their construction excavation activities, not including the day of the notification. Once a third party makes the contact, the Regional Notification Center will issue a USA (Underground Service Alert) Ticket notifying local utilities and other operators of the location and areas to be inspected for potential conflicts of underground infrastructure with the pending planned excavation work. Operators are then required to indicate that there are no facilities in conflict or to mark their underground facilities via aboveground identifiers (*e.g.*, paint, chalk, flags, whiskers) to designate where underground utilities are positioned, thus enabling third parties, like contractors and homeowners, to know where these substructures are located. The law also requires third-party excavators to use careful, manual (hand digging) methods to expose substructures prior to using mechanical excavation tools.

Metric Performance:

For the 3-year period of 2022-2024, SoCalGas has seen a -11.4% decrease in third party dig-in damages, which also contributes to a decrease of -5.4% in the overall damage rate. 811 tickets for 2024 were relatively flat compared to 2023. This was seen from both Regional Notification Centers, DigAlert and USA North 811.

Is Metric Used for the Purposes of Determining Executive (Director Level or Higher) Compensation Levels and/or Incentives? (Ordering Paragraph 6A.)–

- Yes. SoCalGas’s 2024 Executive Incentive Compensation Plan (ICP) and non-executive ICP include a gas safety metric for “Damage Prevention - Damages per USA Ticket Rate.” For ICP purposes, this metric consists of the number of damages that cause a gas leak to SoCalGas’s below ground facilities and the total number of received USA Ticket

⁴⁵ California Government Code § 4216.2(b).

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 of the success of risk reduction activities.

As stated in Section III above, SoCalGas's Executive and non-executive Incentive Compensation Plans are reviewed and updated on an annual basis. For purposes of this 2024 report submission, SoCalGas 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. As described above, SoCalGas's 2024 Executive ICP and non-executive ICP include a gas safety metric for "Damage Prevention - Damages per USA Ticket Rate." This metric is weighted at 6% of the 60% safety weighting for SoCalGas's 2024 Executive ICP and 3% of the 40% safety weighting for SoCalGas's 2024 non-executive ICP.

Is Metric Linked to Executive (Director Level or Higher) Positions? (Ordering Paragraph 6B.)–

- Yes. SoCalGas's "Damage Prevention - Damages per USA Ticket Rate" metric is linked to all SoCalGas 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 SoCalGas's annual Executive ICP and non-executive ICP results and calculations as a bias control. 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. SoCalGas's ICP performance results are reviewed by the Sempra Audit Services department prior to SoCalGas Board approval.

B. 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."

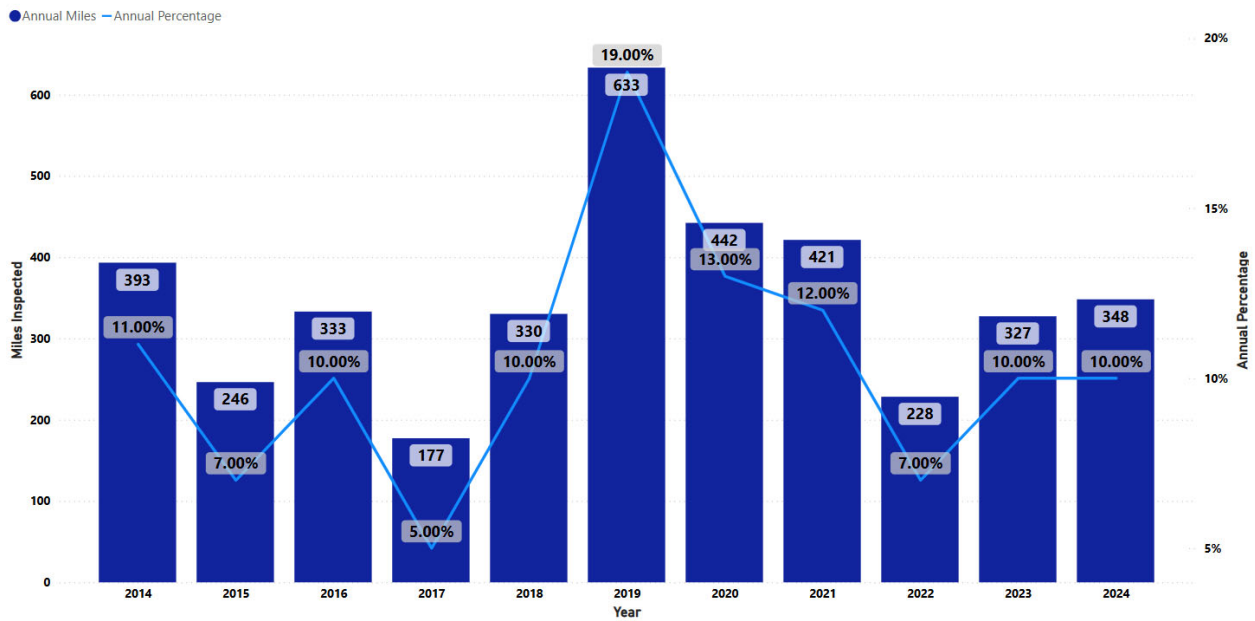
Risk(s): Catastrophic Damage Involving High-Pressure Pipeline Failure.

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)



Metric Background:

SoCalGas’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,⁴⁶ 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. The numbers and types of TIMP activities vary from year to year and are primarily based on baseline assessment schedules, findings from assessments, and interval of reassessments. 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 the scope of the TIMP are assessed using ILI, Direct Assessment, Pressure Test, or other appropriate methods

⁴⁶ 49 CFR § 192, Subpart O and § 192.710.

identified in 49 CFR §§ 192.710, 192.921 & 192.937 and remediated as needed. ILI is the primary assessment method used by SoCalGas, but other methods are employed as well.

The TIMP reduces the risk of failure to the pipeline transmission system and SoCalGas evaluates and enhances the program on a continual basis. One of the recent enhancements to SoCalGas'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 (*e.g.*, Electromagnetic Acoustic Transducer or EMAT) as a complementary inspection tool to traditional ILI tools (*e.g.*, Magnetic Flux Leakage or 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.

Metric Performance:

In 2024, SoCalGas maintained consistent inspection miles and pipeline inspection percentages compared to previous years. 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

C. 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.”

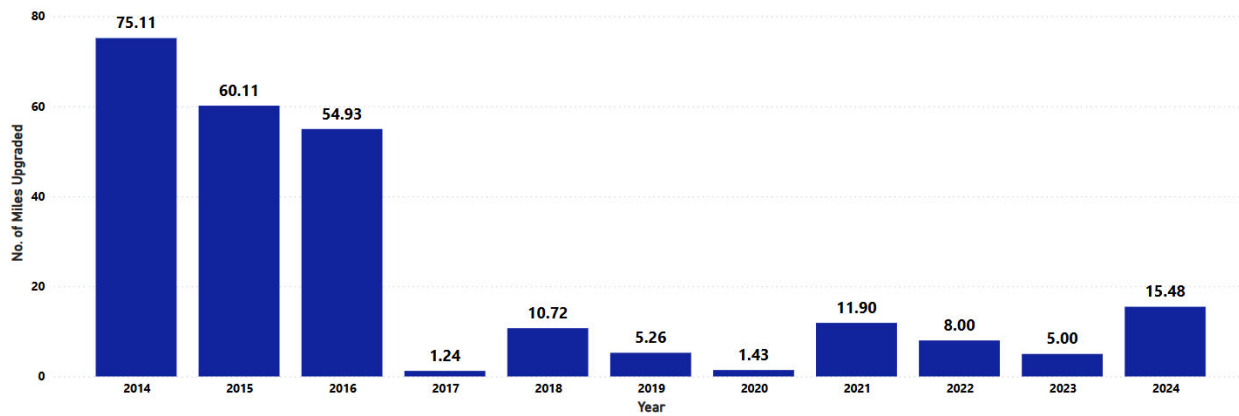
Risk(s): Catastrophic Damage Involving High-Pressure Pipeline Failure.

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. SoCalGas has generally prioritized assessing pipelines using ILI; approximately 86% of total transmission pipeline miles operating in HCAs and approximately 70% of the entire transmission system is 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, SoCalGas 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, SoCalGas 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.

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 7100.2-1.⁴⁷

Metric Performance:

The 2024 inline inspection upgrade miles have increased compared to the average of the past seven years. This can be attributed to the expansion of ILI usage to assess for threats newly added to pipelines, as a result of evolving federal requirements stemming from advisory bulletins and new regulations.⁴⁸ SoCalGas continues to evaluate opportunities to retrofit the transmission system for ILIs.

⁴⁷ 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>.

⁴⁸ Advisory bulletin titled *Pipeline Safety: Deactivation of Threats* (FR Doc. 2017-05262, available at: <https://www.federalregister.gov/documents/2017/03/16/2017-05262/pipeline-safety-deactivation-of-threats>) and final rule titled *Pipeline Safety: Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments* (84 FR 52180).

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. 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.”

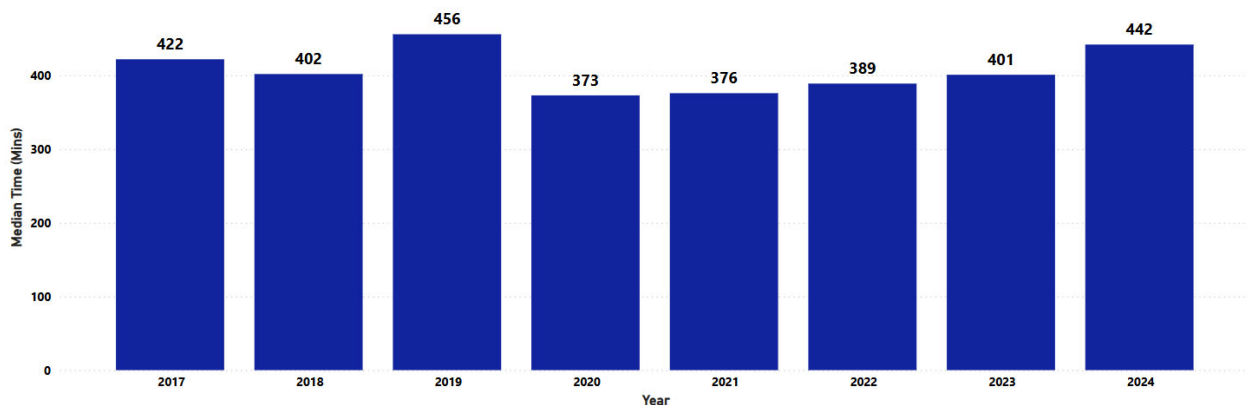
Risk(s): Distribution Pipeline Rupture with Ignition (non-Cross Bore).

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 timing for calculating this response starts when the utility first receives the report of a leak and ends when the utility's qualified representative determines, per the utility's emergency standards, that the reported leak is not hazardous or the utility's representative completes actions to mitigate a hazardous leak and render it as being non-hazardous (*i.e.*, by shutting off gas supply, eliminating subsurface leak mitigation, repair, etc.) per the utility's standards.

Metric Performance:

SoCalGas began tracking this metric in 2017. This data is also reported externally per GO 112-F. The accompanying Excel file in Attachment B provides monthly historical data for 2017 through 2024 for the median time (minutes) that a Gas Service Representative (GSR) or qualified first responder (e.g., Gas Crew, etc.) takes to respond and stop gas flow during incidents involving mains. SoCalGas will continue to track this metric and include it in future annual reports until a full ten years of historical data is provided. This metric includes all activities leading to the mitigation of the hazardous condition, including mobilizing resources to the incident, locating gas facilities, engineering evaluations, establishing traffic control, centering the leak, excavating, clamping or welding. Shut-in times may vary depending on the complexity of the incident. In 2024, SoCalGas continued to implement enhanced data collection methods to better capture response timelines for emergencies where multiple departments respond or for instances where responsibilities are transferred from one department to another. These enhancements help to synchronize reporting across the various applications used by SoCalGas qualified first responders.

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

E. Metric No. 9: Gas Shut-In Time - Services

Metric Name and Description per D.21-11-009: “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.”

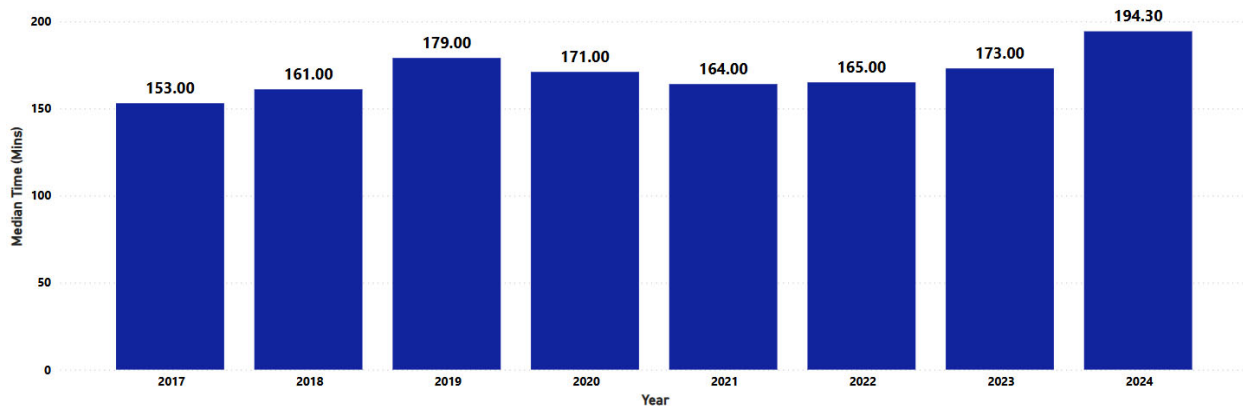
Risk(s): Distribution Pipeline Rupture with Ignition (non-Cross Bore).

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)⁴⁹



⁴⁹ Metric data provided in historical years may be modified due to rounding or reclassification of data.

Metric Background:

The timing for this response starts when the utility first receives the report of a leak and ends when the utility's qualified representative determines, per the utility's emergency standards, that the reported leak is not hazardous or the utility's representative completes actions to mitigate a hazardous leak and render it as being non-hazardous (e.g., by shutting off gas supply, eliminating subsurface leak mitigation, and repair) per the utility's standards.

Metric Performance:

Similar to Metric No. 8, SoCalGas began tracking this metric in 2017. This data is also reported externally per GO 112-F. The accompanying Excel file in Attachment B provides monthly historical data for 2017 through 2024 for the median time (minutes) that a Gas Service Representative (GSR) or qualified first responder (e.g., Gas Crew) takes to respond and stop gas flow during incidents involving services. SoCalGas will continue to track this metric and include it in future annual reports until a full ten years of historical data is provided. This metric includes all activities leading to the mitigation of the hazardous condition, including mobilizing resources to the incident, locating gas facilities, engineering evaluations, establishing traffic control, centering the leak, excavating, clamping or welding. Shut-in times may vary depending on the complexity of the incident. Additionally, in 2024 SoCalGas continued to implement enhanced data collection methods to better capture response timelines for emergencies where multiple departments respond or for instances where responsibilities are transferred from one department to another. These enhancements help to synchronize reporting across the various applications used by SoCalGas qualified first responders.

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

F. Metric No. 10: Cross Bore Intrusions

Metric Name and Description per D.19-04-020: “Cross Bore Intrusions: Cross bore intrusions found per 1,000 inspections.”

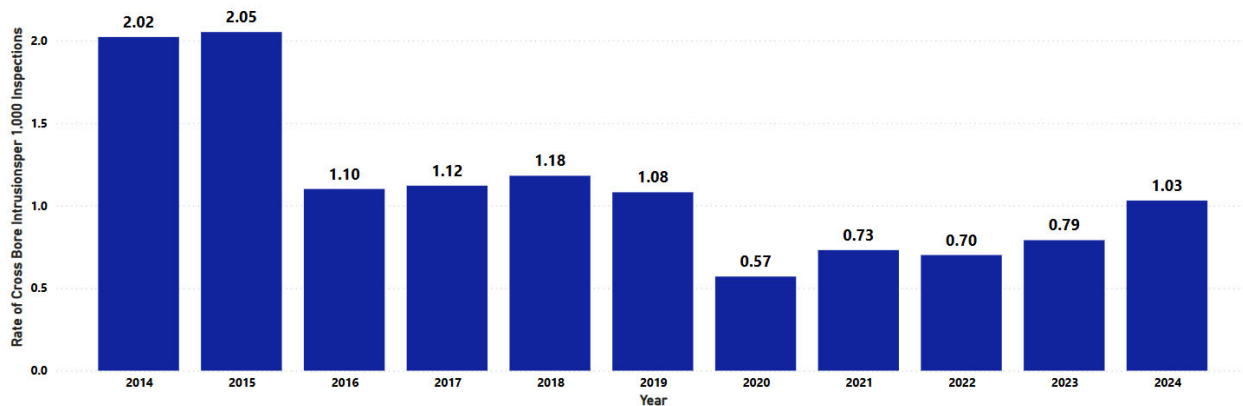
Risk(s): Catastrophic Damage Involving Medium Pressure Pipeline Failure.

Category: Gas.

Units: Number of cross bore intrusions per 1,000 inspections.

Summary:

Summary Chart of Cross Bore Intrusions Metric Data



Metric Background:

SoCalGas’s Sewer Lateral Inspection Project (SLIP) is a risk mitigation activity developed and managed as part of SoCalGas’s Distribution Integrity Management Program (DIMP). SLIP addresses 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.” Through the SLIP, SoCalGas is inspecting the confluence of natural gas and sewer lines to verify that there is no cross bore. Should a cross bore be found, it is remediated, which mitigates the potential of an incident due to a homeowner or plumber attempting to clear a sewer line when a clog is present.

Metric Performance:

In 2024, 1.03 cross bore intrusions were found for every 1,000 inspections. The number of field inspections completed and the number of cross bore intrusions found are collected internally and used to calculate this metric. The number of cross bores intrusions found varies from year to year; therefore, year-to-year data is not an indicator of project performance.

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. 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.”

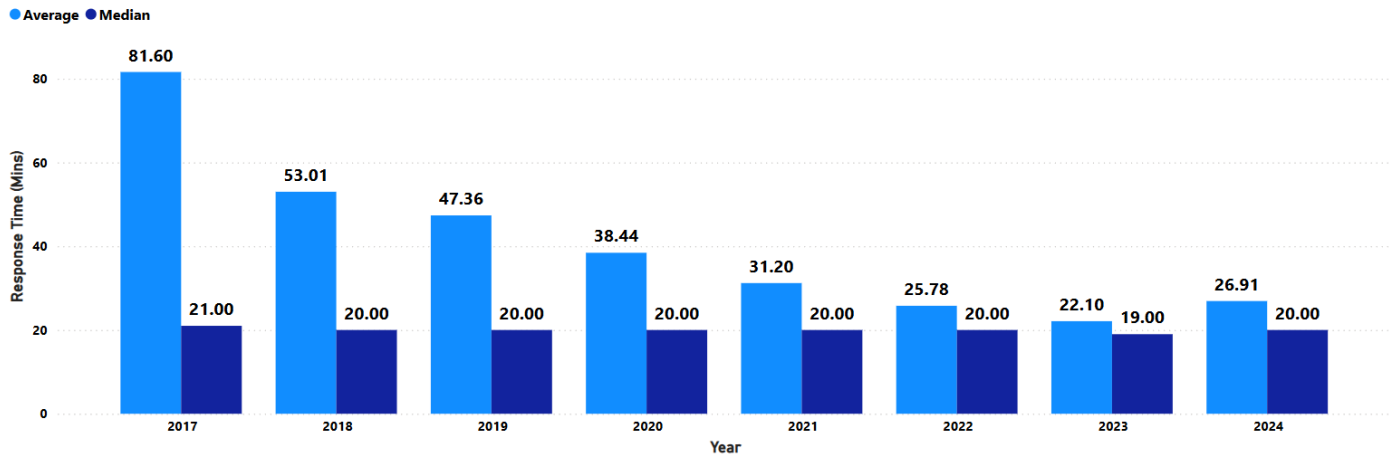
Risk(s): Distribution Pipeline Rupture with Ignition.

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 Response Times Metric Data (Annual)



Metric Background:

SoCalGas responds to emergency calls 24 hours per day, 365 days per year from any of its residential, commercial, industrial, and agriculture customers. SoCalGas’s technicians/gas service representatives respond to gas leaks or gas odors and take appropriate action. SoCalGas has a pipeline safety campaign, which is mandated by federal pipeline safety regulation.⁵⁰ SoCalGas’s campaign includes bill inserts, mailings to residential and business customers,

⁵⁰ 49 CFR § 192.

mailings to excavators, businesses, land developers, and farmers, and communications to schools and universities, public officials, and emergency officials. Pipeline safety efforts provide customers with information about natural gas pipeline locations; what to do if you sense a leak/smell gas; and messaging to direct the public to call 811 (*i.e.*, DigAlert) and other actions to take prior to digging.

The accompanying Excel file in Attachment B provides monthly historical data for 2017 through 2024 for the average time that a Gas Service Representative or a qualified first responder takes to respond after receiving a call that results in an emergency order. Per the unit description, the data has been segregated in the accompanying Excel file by: (1) business hours (0800 – 1700 hours), (2) after business hours, and (3) weekends/legal state holidays. SoCalGas began tracking this metric in 2017 when GO 112-F went into effect. The data included herein aligns with that reported in SoCalGas’s annual GO 112-F submission.

Metric Performance:

SoCalGas attributes the significant decrease in average response times seen since 2017 in part to data collection improvements implemented in 2018. In February 2018, SoCalGas implemented a Real Time Monitoring data collection effort to capture arrival times more accurately. SoCalGas notes, however, that a singular event, such as a mass gas odor notification, can skew the average results and show slower average response times due to multiple calls and resource constraints. For instance, if a nearby landfill emits a methane-like smell on a hot day, SoCalGas can receive numerous calls. Since all emergency calls are captured in this metric data, response times may be skewed as this data does not exclude events that may be characterized as an outlier. In 2024, SoCalGas continues to implement enhanced data collection methods to better capture response timelines for emergencies where multiple departments respond or for instances

where responsibilities are transferred from one department to another. These enhancements help to synchronize reporting across the various applications used by SoCalGas qualified first responders.

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

- Yes. SoCalGas’s 2024 Executive ICP and non-executive ICP include the following customer, public and system safety performance measure:
 - A1 Gas Leak Order Response Time⁵¹ – This metric is to measure the effectiveness of response time for Customer Services Field A1 gas leak orders. The operational goal is for Customer Services Field Technicians to respond to A1 gas leak orders within 30 minutes during regular business hours and within 45 minutes outside of regular business hours (regular business hours are defined at 7am to 5pm Monday to Saturday, excluding holidays). This goal measures the percentage of time that Customer Services Field Technicians meet these criteria. A1 gas leak orders used for this measure excludes area odor orders.
 - As stated in Section III, above, SoCalGas’s Executive and non-executive Incentive Compensation Plans are reviewed and updated on an annual basis. For purposes of this 2024 report submission, SoCalGas 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, SoCalGas’s 2024 Executive ICP and non-executive ICP include a gas safety metric for “A1 Gas Leak Order Response Time.” This metric is weighted at 6% of the 60% safety weighting for SoCalGas’s 2024 Executive ICP and 4% of the 40% safety weighting for SoCalGas’s 2024 non-executive ICP.

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

- Yes. SoCalGas’s A1 Gas Leak Order Response Time performance measure is linked to all SoCalGas 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.

⁵¹ Gas Emergency Response includes A1 Gas Leak Order Response Time plus leaks discovered during leak surveys that do not come through the customer call center.

- Sempra’s Audit Services department reviews SoCalGas’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. SoCalGas’s ICP performance results are reviewed by the Sempra Audit Services department prior to SoCalGas Board approval.

H. Metric No. 12: Natural Gas Storage Baseline Inspections Performed

Metric Name and Description per D.21-11-009: “Natural Gas Storage Baseline Assessments Performed: 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 and reassessment inspections 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.”

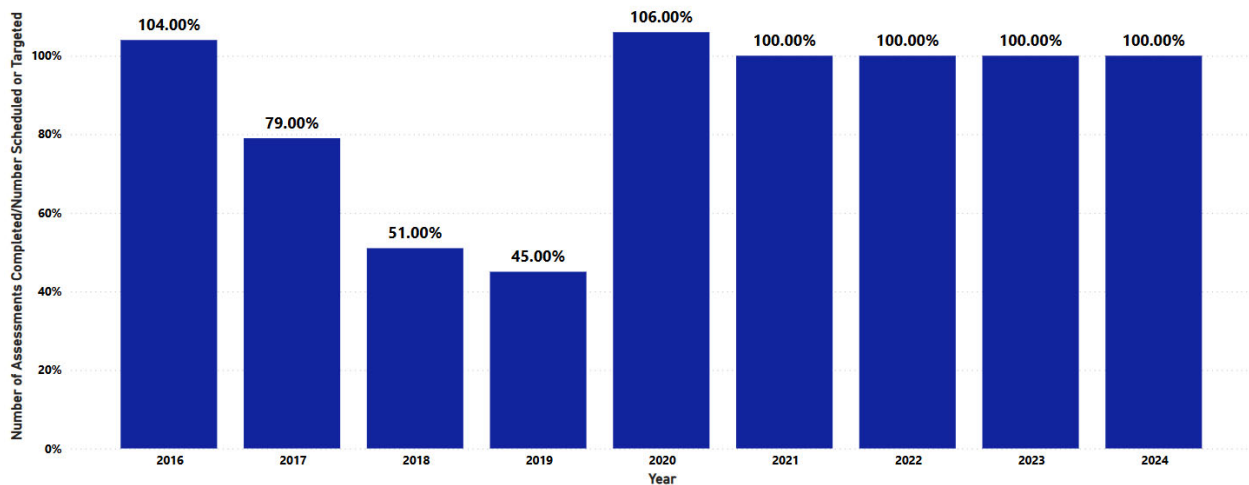
Risk(s): Gas Storage.

Category – Gas.

Units – Number of Assessments completed/Number scheduled or targeted.

Summary:

*Summary Chart of Natural Gas Storage Baseline and Reassessment Inspections Performed
Metric Data (Annual)*



Metric Background:

Historically, SoCalGas has conducted periodic inspections on its storage wells, including – but not limited to – pressure tests, casing inspection logs, temperature surveys, and noise surveys. However, Metric No. 12: Natural Gas Storage Baseline Inspections Performed, is

defined specifically to represent a suite of tests that are conducted on every storage well within an established assessment period, compliant with federal and state regulations. These inspections started in 2016 and are managed through SoCalGas's Storage Integrity Management Program (SIMP).

SIMP uses inspection technologies such as ultrasonic thickness and magnetic flux leakage inspection tools, along with risk management disciplines to identify and mitigate potential storage well safety and/or integrity issues. SIMP is driven by federal PHMSA regulations,⁵² which adopt requirements of API RP 1171, including provisions for well integrity evaluation. California Geologic Energy Management Division (CalGEM) regulations⁵³ further define mechanical integrity testing of a well to include, at a minimum:

- A temperature and noise log
- A casing wall thickness inspection
- Pressure testing of the production casing

SoCalGas completed its baseline inspections and initiated reassessments of existing storage wells in 2019 and 2020. Since 2022, baseline assessments have been conducted for newly drilled replacement wells and reassessments continued for existing wells.

Regulations and research also continue to evolve regarding the recommended frequency of well re-inspections, with CalGEM regulations currently requiring a 24-month inspection frequency on most wells and CalGEM authorizing extensions beyond 24 months on a well-by-well basis. In September 2024, CalGEM began requiring one-time assessment interval extensions contingent upon SoCalGas meeting the following conditions: conducting through-

⁵² 49 CFR § 192.12.

⁵³ CalGEM, *Statutes & Regulations* (January 2022) at 245 (citing 14 CCR § 1726), available at <https://www.conservation.ca.gov/index/Documents/CALGEM-SR-1%20Web%20Copy.pdf>.

tubing logging (TTL) and a modified pressure test and/or Standard Annual Pressure Test (SAPT) approximately half-way through the approved interval. Per CalGEM’s guidance, “through-tubing logging can provide qualitative data about gas storage well condition when other data is limited, and as a supplemental tool to support alternative mechanical integrity testing (MIT) interval schedules.”⁵⁴ As a result of CalGEM’s requirement to conduct the TTL rigless assessments and the SAPT midway through the assessment interval, SoCalGas is including these assessments in the official metric counts for 2024. This modification falls under the original metric language, “The number scheduled will depend on any regulatory required inspections as well as any initiated by the utility.”

SoCalGas is currently defining completed well assessment inspections and reassessment inspections based on CalGEM’s approval of logs and tests. The same applies to TTL assessments and SAPT for which SoCalGas is required to submit logs to CalGEM for review. The data provided is based on the best available information at the time this report is compiled and SoCalGas reserves the right to supplement, amend, or correct this report.

Metric Performance:

SoCalGas’s inspection performance trend remained steady year over year, reflecting the Company's effort to complete baseline and reassessment inspections that were scheduled in each given year. CalGEM has approved well assessment interval extensions since 2022, which has decreased the number of assessments scheduled each year. Beginning in 2024, CalGEM is requiring rigless through-tubing logging and SAPTs midway through the extended interval assessment period. Since these logs are considered regulatory required alternative mechanical

⁵⁴ Letter from Jeanette Hand, Underground Gas Storage Program Manager of CalGEM – Underground Gas Storage Program (June 19, 2024), Subject: Through-Tubing Logging Criteria, *available upon request*.

integrity testing to support the new interval schedules, TTL assessments and SAPTs are being counted as part of Metric 12 as of 2024. Even with the inclusion of these new logging activities, SoCalGas continued to achieve 100% of scheduled and targeted assessments.

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. 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.”

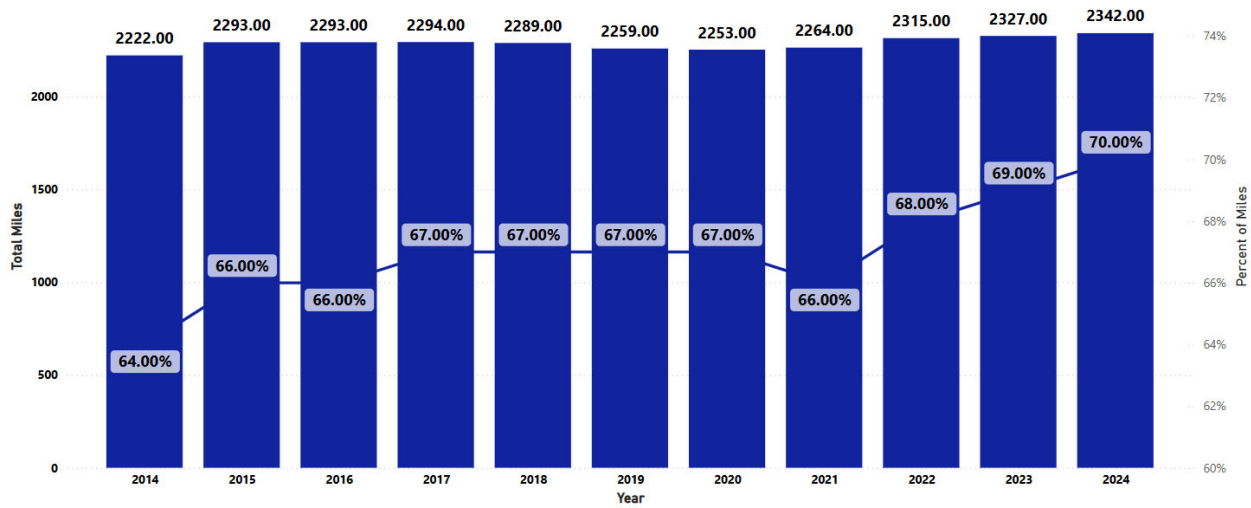
Risk(s): Catastrophic Damage Involving High-Pressure Pipeline Failure.

Category: Gas.

Units: Percentage and Miles.

Summary:

Summary Chart of Gas Pipelines That Can Be Internally Inspected Metric Data (Annual)



Metric Background:

As described above for Metric No. 6, SoCalGas’s TIMP is federally mandated to identify threats to transmission pipelines in HCAs or particular areas outside of HCAs (covered non-HCAs),⁵⁵ 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 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, 921 & 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 SoCalGas transmission system that

⁵⁵ 49 CFR § 192, Subpart O and § 192.710.

have been internally inspected in the past. Annual data is included in the accompanying Excel file (Attachment B) for 2015 through 2024.

As stated above for Metric No. 7, SoCalGas prioritizes assessing pipelines using ILI. As of year-end 2024, approximately 70% of SoCalGas’s transmission pipeline system has been confirmed to accommodate ILI tools. SoCalGas continues to evaluate ILI retrofit opportunities through the TIMP threat and risk analysis process.

Metric Performance:

This metric has remained relatively constant since 2015 at 66%-70% because not all transmission pipelines can accommodate ILI tools and, depending on the threats and risks associated with pipeline segments, not all transmission pipelines need to be assessed by ILI tools. Retrofitting may take place depending on the factors discussed under Metric No. 7 and SoCalGas continues to evaluate these opportunities. Overall, SoCalGas’s total piggable miles continue to increase, reflecting the company’s commitment to enhancing integrity assessments and the safety of its gas transmission system through the use of inline inspections.

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

- No.

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

- No.

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

- No.

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

- N/A

J. 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.”

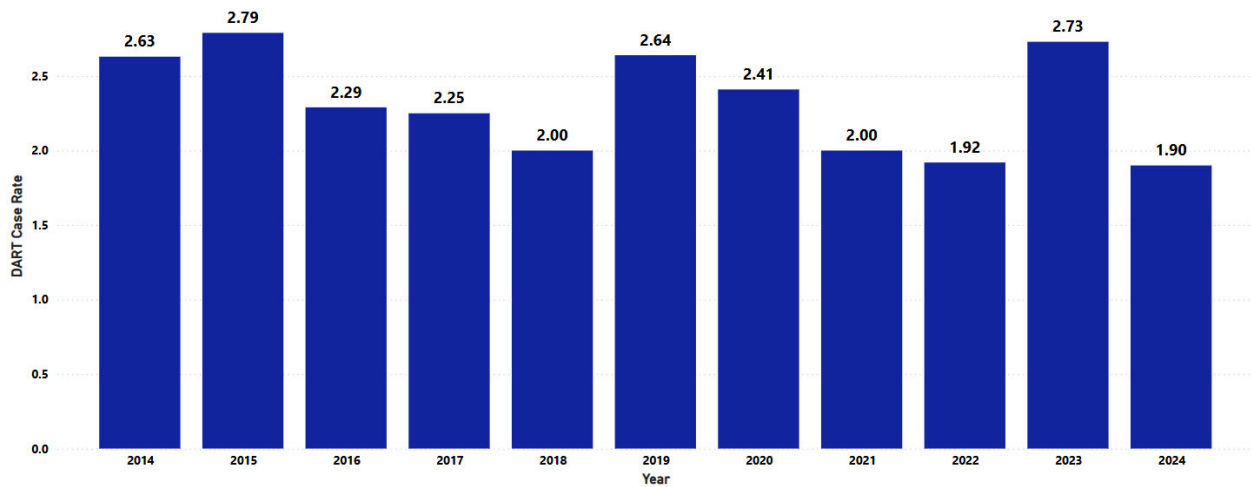
Risk(s): Employee Safety.

Category: Injuries.

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

Summary:

Summary Chart of Employee DART Rate Metric Data (Year-end)



Metric Background:

The DART rate is a key indicator of employee safety and is calculated based on the number of OSHA-recordable injuries resulting in Days Away from work and/or Days on Restricted Duty or Job Transfer, and hours worked. The DART case rate is a lagging metric of injury severity, reflecting how employees are kept away from their normal duties due to an injury or illness.

SoCalGas consistently assesses and implements initiatives to further reduce its DART case rate.

These initiatives include enhancements in the Occupational Health Nurse Program and collaborating with Employee Care Services to facilitate the return of employees from restricted duties or absences due to occupational injuries. In addition, the Safety and Health team lead

various programs aimed at reducing office and field injuries and illnesses, including enhancements to our current job safety observation and coaching programs. These programs include The Winning 7, Enhanced Safety Observations, the Safety in Motion field and office ergonomics program, and other safety training to include incident evaluations, all of which provide valuable insights for injury and illness prevention.

Metric Performance:

In 2024, SoCalGas achieved the lowest DART Rate level in the past decade. Since 2014, trends have shown a general decrease in the DART rate. The most significant year-over-year change occurred between 2023 and 2024, with a 30% reduction.

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

- Yes. SoCalGas’s 2024 Executive ICP and non-executive ICP include the following employee safety performance measure:
 - Lost Time Incident Rate (LTI)⁵⁶ -LTI is expressed as “the number of OSHA recordable incident cases resulting in lost time per 100 employees.” This measure is calculated using the number of OSHA recordable incidents with lost time per 200,000 hours worked.⁵⁷ As DART cases are defined as any OSHA incident with Days Away/Restricted/Transfer, this measurement includes LTIs. As stated in Section III, above, SoCalGas’s Executive, and non-executive Incentive Compensation Plans are reviewed and updated on an annual basis. For purposes of this 2024 report submission, SoCalGas 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 SoCalGas’s LTI is included in SoCalGas’s 2024 Executive and non-executive ICP. This specific performance measure is weighted at 4% of the overall 60% safety management systems measures of the 2024 Executive ICP and 4% of the overall 40% safety management systems measures of the 2024 non-executive ICP.

⁵⁶ Note: OSHA recordable incidents related to COVID-19 are to be excluded from this measurement and shall not impact the LTI rate for purposes of this goal.

⁵⁷ DART includes LTI plus Days on Restricted Duty or Job Transfer.

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

- Yes. SoCalGas’s LTI performance measures are linked to all SoCalGas 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 SoCalGas’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. SoCalGas’s ICP performance results are reviewed by the Sempra Audit Services department prior to SoCalGas Board approval.

K. Metric No. 15: Rate of Serious Injuries or Fatalities (SIF) Actual (Employee)

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

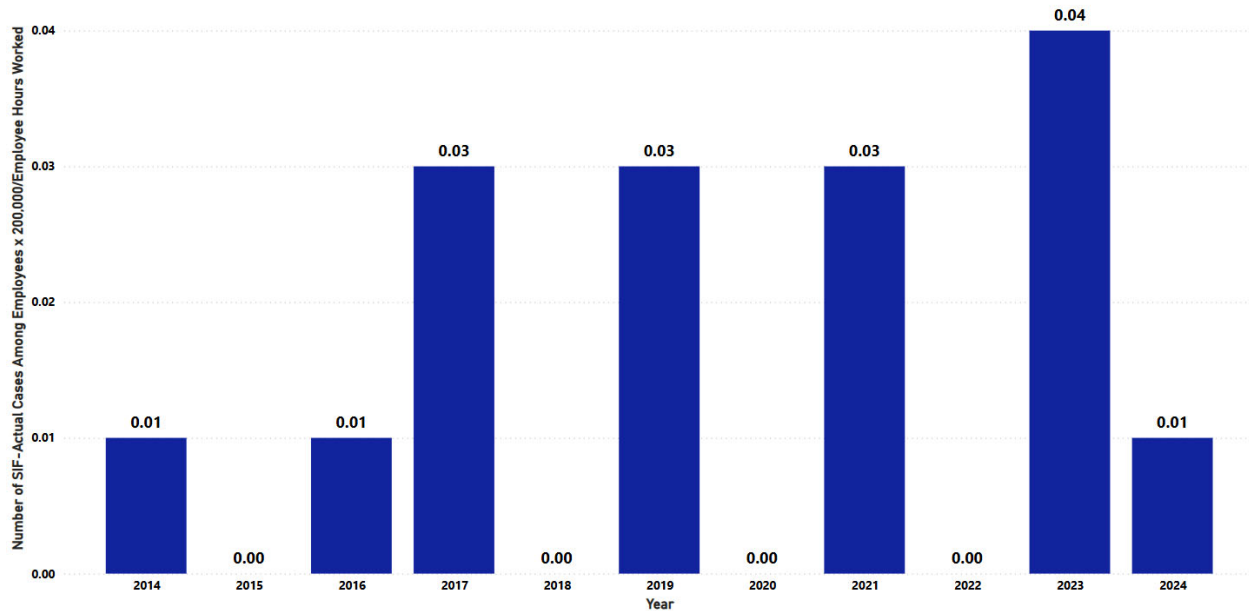
Risk(s): Employee Safety.

Category: Injuries.

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

Summary:

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



Metric Background:

To determine the rate of SIF Actual (Employee), SoCalGas uses the Cal/OSHA definition of “serious injury” defined in CCR, Title 8, § 330(h) to be consistent with the California reporting requirements. SoCalGas notes that the 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.”⁵⁸ SoCalGas 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. SoCalGas also notes that a new definition

⁵⁸ 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>.

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:

In 2024, the number of Serious Injury and Fatality (SIF) incidents was significantly lower compared to 2023. Ten years of monthly historical data are provided in the accompanying Excel file (Attachment B) for SoCalGas’s Employee Serious Injury and Fatality rate. The Cal/OSHA definition is the one used by California employers for mandatory reporting of work connected serious injuries to Cal/OSHA and is more conservative when compared with the classification methodology espoused in the EEI criteria for “serious injury.” SoCalGas's use of the Cal/OSHA definition not only is consistent with the California reporting requirements, but it also avoids the confusion that could occur if different criteria were applied for different reporting objectives. **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. SoCalGas’s 2024 Executive ICP and non-executive ICP include the following employee safety performance measure:
 - Lost Time Incident Rate (LTI)⁵⁹ - LTI is expressed as “the number of OSHA Recordable Incident Cases resulting in Lost Time per 100 employees.” This measure is calculated using the number of OSHA recordable incidents with lost time per 200,000 hours worked. As DART cases are defined as any OSHA incident with Days Away/Restricted/Transfer, this measurement includes LTIs. As stated in Section III, above, SoCalGas’s Executive, and non-executive Incentive Compensation Plans are reviewed and updated on an annual basis. For purposes of this 2024 report submission, SoCalGas 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 SoCalGas’s LTI is included in SoCalGas’ 2024 Executive and non-executive ICP. This specific performance measure is weighted at 4% of the overall 60% safety management systems measures of the 2024 Executive ICP and 4% of the overall 40% safety management systems measures of the 2024 non-executive ICP.

⁵⁹ Note: OSHA recordable incidents related to COVID-19 are to be excluded from this measurement and shall not impact the LTI rate for purposes.

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

- Yes. SoCalGas’s LTI performance measures are linked to all SoCalGas 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 SoCalGas’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. SoCalGas’s ICP performance results are reviewed by the Sempra Audit Services department prior to SoCalGas Board approval.

L. 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.”

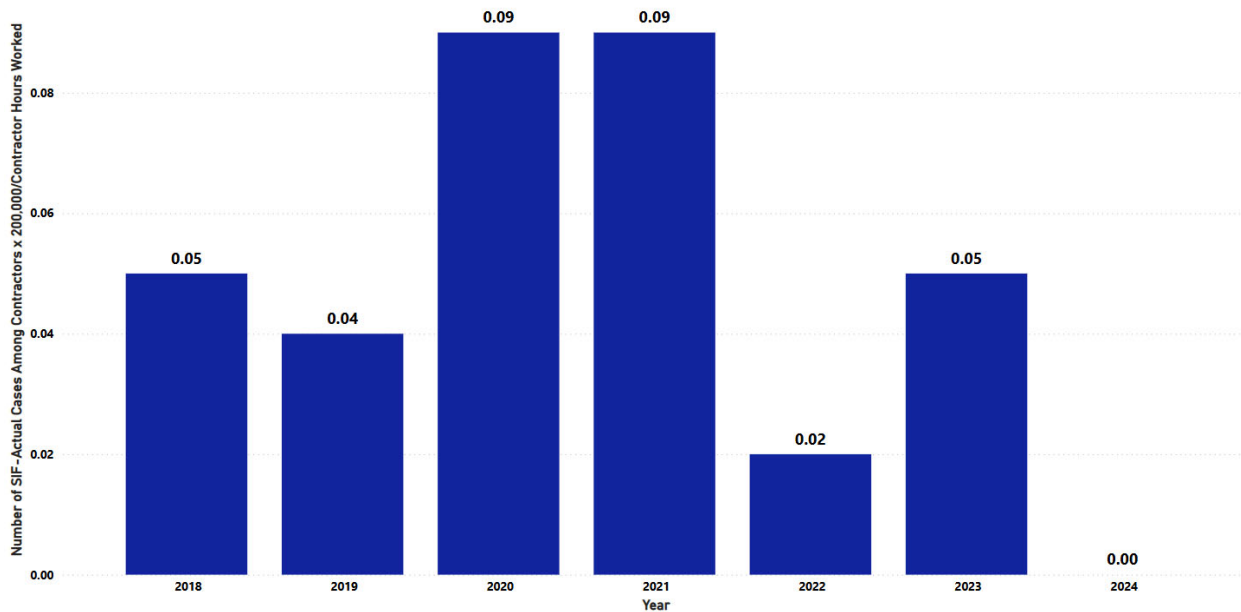
Risk(s): Contractor Safety.

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:

SoCalGas has tracked Serious Injury and Fatality (SIF) rate for Class 1⁶⁰ contractors since 2018 and utilizes the Cal/OSHA definition of “serious injury” defined in CCR, Title 8, § 330(h). The Cal/OSHA definition is the one used by California employers for mandatory reporting of work connected serious injuries to Cal/OSHA and is more conservative when compared with the classification methodology espoused in the EEI criteria for "serious injury." SoCalGas’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. On January 1st, 2020, a new definition of “serious injury” went into effect in California, which impacted the incidents that were considered reportable from 2020

⁶⁰ Class 2 Contractors do not fall within the enhanced SoCalGas Contractor Safety Program. Class 2 Contractors are defined as: a contractor engaged to perform any other work than work defined as Class 1. Examples of Class 2 Contractors include contractors engaged to perform administrative tasks or information technology (IT) work.

to 2024. In the previous definition, hospitalizations greater than 24 hours for other than observation were reportable to Cal/OSHA whereas the new definition considers reportable as any hospitalization for any duration other than observation.

SoCalGas uses third-party administration tools to manage various aspects of its contractor safety program. For example, ISNetwork (ISN) is an online contractor and supplier management platform of data-driven products and services that help manage risk through data collected across the contractors' operations nationally.⁶¹ All Class 1 contractors are required to report SIF cases and hours worked related to SoCalGas projects in ISN.

Metric Performance:

In 2024, SoCalGas contractors reported no SIFs for All Class 1 Contractors, which is the basis of this metric. SoCalGas's Contractor Safety Oversight consists of contractor safety program policies and procedures, Contractor Safety Manual for Class 1 Contractors, field safety and performance inspections and oversight, post-job safety evaluations, stop-the-job, near-miss and good catch reporting, internal audits, enforcement actions, and management of the pipeline safety risk by the SoCalGas Pipeline Safety Oversight organization. These activities enhance the safety of SoCalGas construction projects from inception to completion.

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.

⁶¹ ISNetwork, available at: <https://www.isnetwork.com/>.

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. 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.”

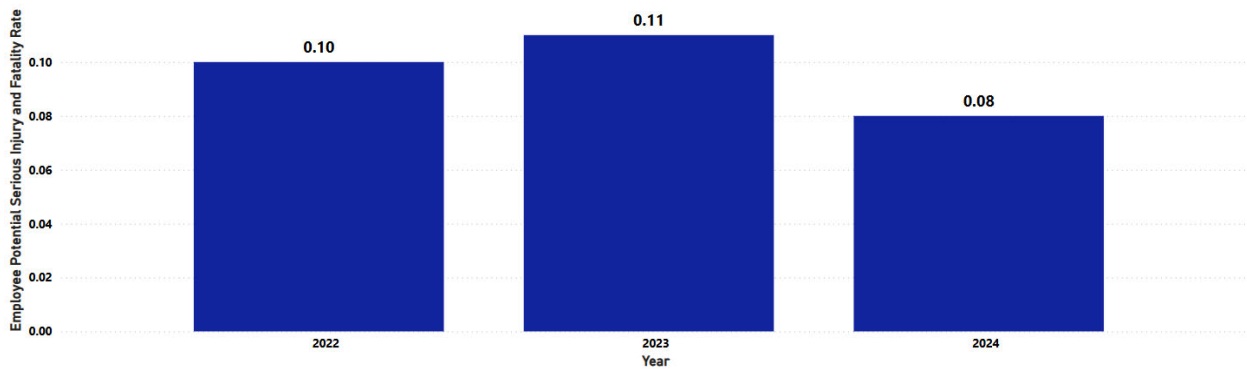
Risk(s): Employee Safety.

Category: Injuries.

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

Summary:

Summary Chart of Rate of SIF Potential (Employee) Metric Data (Annual)



Metric Background:

The Rate of Serious Injuries and Fatalities (SIF) Potential (Employee) metric was introduced in D.21-11-009 in 2021. SoCalGas had not tracked SIF Potential (Employee) data before 2022. In 2022, SoCalGas adopted the Edison Electric Institute (EEI) Safety Classification and Learning (SCL) Model to classify and track SIF Potential (Employee). This classification

and tracking continued through 2024. This framework provides a valuable process to identify PSIFs, turning them into opportunities to enhance our ability to recognize and mitigate hazards. By analyzing SIF Potential, we can determine if current safeguards need strengthening, offering valuable lessons for proactive corrective actions and continuous improvements.

A key lesson from the assessments is that the methodology is a powerful tool for hazard recognition, providing a hierarchical understanding of risk severity and revealing common high-risk factors within and across multiple organizations within the Company. Sharing these insights can lead to stronger and more effective corrective actions. In support of our commitment to safety excellence and continuous improvement, we enhance our EEI framework by applying and sharing insights across the organization.

Metric Performance:

SoCalGas has maintained a consistently low PSIFs over the past 3 years since tracking this metric began.

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

N. 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.”⁶² If a utility has implemented a replicable, substantially similar evaluation methodology for assessing SIF Potential, the utility may use that method for reporting this metric. If a utility opts to report the rate of SIF Potential using a method other than the EEI Safety Classification Model, it must explain how its methodology for counting SIF Potential differs and why it chose to use it. As a supplemental reporting requirement to the Potential SIF Rate (Contractor), all utilities shall provide information about key lessons learned from SIF Potential (Contractor) incidents.

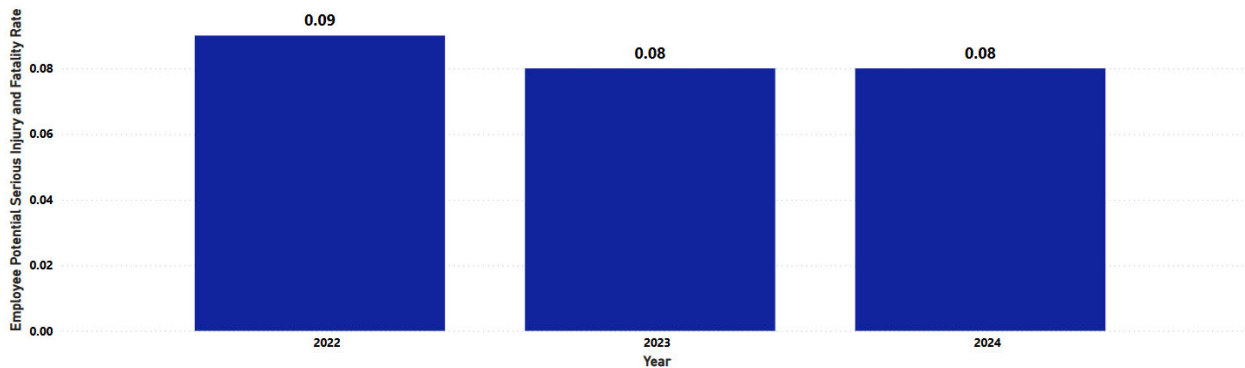
Risk(s): Contractor Safety.

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 (Contractor) Metric was adopted in D.21-11-009. SoCalGas had not tracked potential SIF data prior to 2022. In 2022, SoCalGas developed and implemented

⁶² 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>.

a framework to utilize the Edison Electric Institute (EEI) Safety Classification and Learning (SCL) Model required by this Metric to track SIF Potential (Contractor). SoCalGas has retained a technical advisor who is the principal author of the EEI Model to support SoCalGas in the implementation and assist in developing a roadmap and training for the SIF Potential classification. Analysis of SIF Potential will lead to lessons learned or new approaches to corrective actions.

Metric Performance:

SoCalGas SIF Potential has been consistently low in the past 3 years the metric has been tracked.

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

O. 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.”

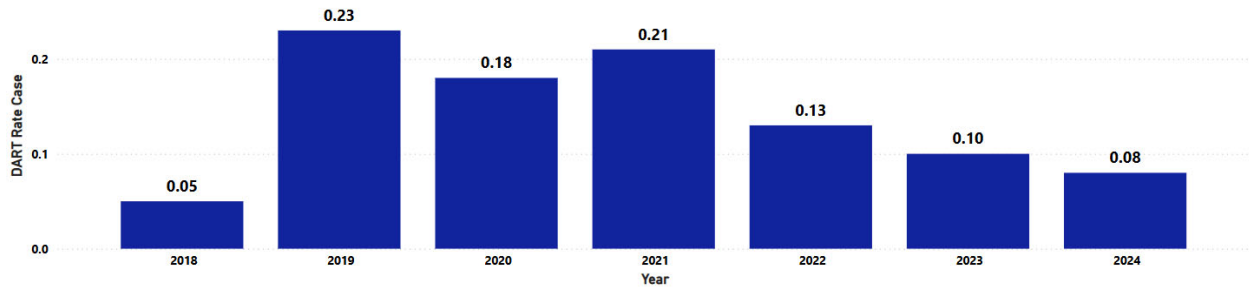
Risk(s): Contractor Safety.

Category: Injuries.

Units: OSHA DART Rate.

Summary:

Summary Chart of Contractor DART Rate Metric Data (Year-end)



Metric Background:

SoCalGas has tracked DART Rate for Class 1 contractors since 2018. A DART Rate is calculated based on the number of OSHA-recordable injuries resulting in Days Away from work and/or Days on Restricted Duty or Job Transfer, and hours worked. All Class 1 contractors are required to report DART cases and hours worked related to SoCalGas projects in ISN.

Metric Performance:

SoCalGas contractor DART rate has consistently decreased every year since 2021. All Class 1 Contractors are included in this metric. As described above for Metric No. 16, Rate of SIF Actual (Contractor), SoCalGas’s comprehensive contractor safety program consists of the pre-qualification, oversight, observations, pre-work safety meetings and efforts all aimed to reduce risk of a safety event caused by Class 1 Contractors while conducting work on behalf of SoCalGas. SoCalGas aims to reinforce its strong safety culture by engaging with contractors in a variety of ways, including hosting an annual Contractor Safety Congress and three Quarterly Meetings with its Class 1 Contractors. Additionally, SoCalGas requires all its Class 1 Contractors to develop and implement a Stop the Job policy on SoCalGas projects. SoCalGas also encourages its contractors to report near miss or close calls or good catch incidents so that everyone can learn from these incidents and prevent injuries and/or reduce/eliminate safety risks

on the job and to the Company’s pipeline delivery system.

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. 20: Public Serious Injuries and Fatalities

Metric Name and Description per D.19-04-020: “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.”

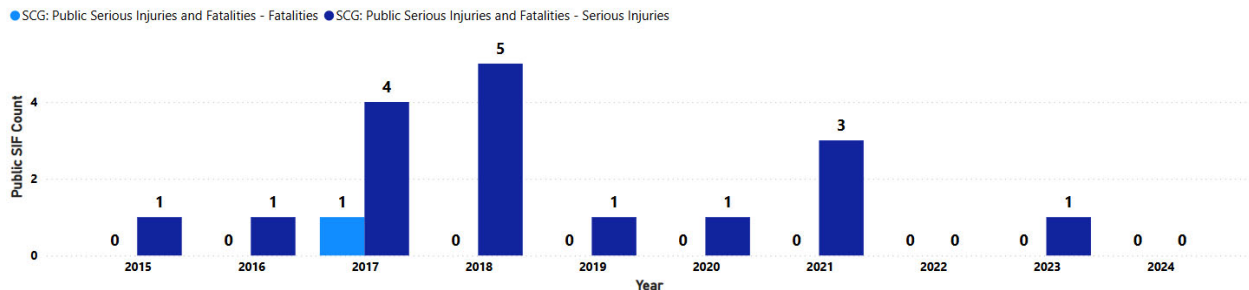
Risk(s): Public Safety.

Category: Injuries.

Units: Number of Serious Injuries and Fatalities.

Summary:

Summary Chart of Public Serious Injuries and Fatalities Metric Data (Annual)⁶³



⁶³ The data is based on the date the event occurred.

Metric Background:

SoCalGas conducts public awareness efforts in the form of outreach meetings, to enhance the safety of its customers and the public. These efforts are designed to engage with the Company's customers and the public to inform them about our shared safety responsibilities. When possible, meetings are held prior to the start of planned public projects, to give hands-on instruction for the contractors performing the work. In some cases, meetings are held after damage has occurred, in order to educate the public on what went wrong and how damage may be avoided in the future. Communication with the public promotes safety on a wide array of topics including, but not limited to, information about gas line locations and safe practices. Without adequate communication and education programs, the public may not know how to safely dig into 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.

An integrated approach to safety is taken by SoCalGas, and there are a multitude of safety practices included in operational work undertaken by the company from its design and construction of facilities to the continuous evaluation and improvement of operation and maintenance activities. SoCalGas addresses safety concerns through public communication and awareness, emergency response, safety programs and practices, and fosters a workplace that encourages continual open and informal discussion of safety-related issues. For example, SoCalGas has meetings and campaigns that are founded on safety training and workforce education.

Metric Performance:

SoCalGas includes public serious injuries and fatalities data for 2015 through 2024 in the accompanying Excel file, Attachment B. Per the metric description, reportable data includes “a fatality or personal injury requiring in-patient hospitalization involving utility facilities or equipment. Equipment includes utility vehicles used during the course of business.” SoCalGas's internal database captures historical data beginning in 2015. SoCalGas submitted a draft of its Public-SIF data to the Commission’s SPD staff on January 30, 2025, as directed by D.19-04-020.⁶⁴ On March 5, 2025, SPD informed SoCalGas that there were no changes to the Pub-SIF subcategories for the Public Serious Injuries and Fatalities metric.⁶⁵ D.19-04-020 states, “[f]or Metric 22,⁶⁶ 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.”⁶⁷ Therefore, using the subcategories designated by SPD, SoCalGas’s 2024 Pub-SIF data can be categorized as follows, and should a Pub-SIF event occur in the future, the data would be depicted in the format below:

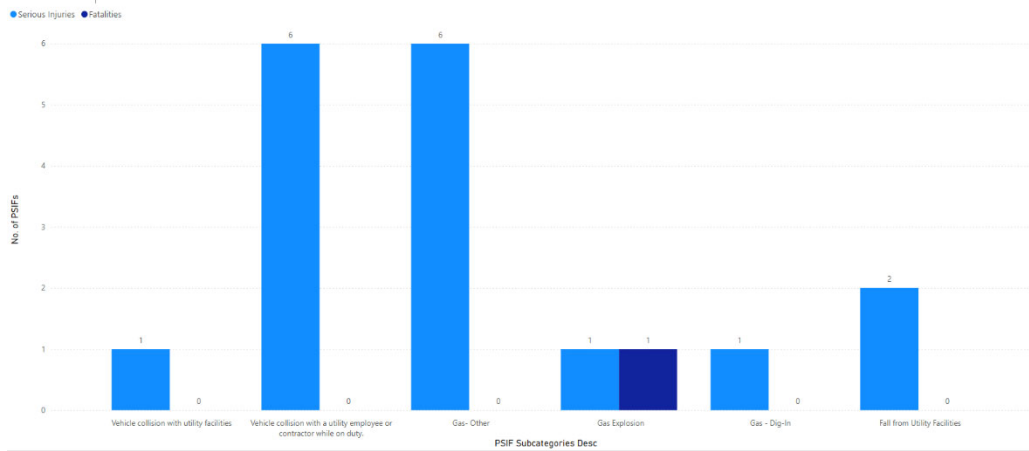
⁶⁴ The data included in this final report supersedes that included in the January 28 draft submission as the draft data included injuries beyond those required to be reported here per the metric description.

⁶⁵ E-mail from Anwar Safvi, SPD staff, to SoCalGas representative (March 5, 2024).

⁶⁶ 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.

⁶⁷ D.19-04-020 at 26, n.49.

2024 Chart 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. SoCalGas’s 2024 Executive ICP and non-executive ICP include a category of “Customer, Public & System Safety” performance goals. The performance goals within the Customer, Public & System Safety category include: A1 Gas Leak Order Response Time, Damage Prevention – Damages per USA Ticket Rate, Distribution Integrity Management Program (DIMP) – Vintage Integrity Program – Miles of Vintage Mains and Services Replaced, and Gas Transmission Safety – Number of Pipeline Valve Retrofit Projects.

As stated in Section III, above, SoCalGas’s Executive and non-executive Incentive Compensation Plans are reviewed and updated on an annual basis. For purposes of this 2024 report submission, SoCalGas 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, SoCalGas’s 2024 Executive Incentive Compensation Plan and non-executive Incentive Compensation Plan include a category of “Customer, Public & System Safety” performance goals. The performance goals within this category are weighted as follows as part of SoCalGas’s 60% safety weighting in its 2024 Executive ICP and 40% safety weighting in its 2024 non-executive ICP.

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

- Yes. The above listed performance goals within the Customer, Public & System Safety category are linked to all Executive (Director level or higher) positions covered by either the SoCalGas 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 SoCalGas’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. SoCalGas’s ICP performance results are reviewed by the Sempra Energy Audit Services department prior to SoCalGas Board approval.

Q. Metric No. 21: Helicopter/Flight Accident or Incident

Metric Name and Description per D.19-04-020: “Helicopter/Flight Accident or Incident. Defined by Federal Aviation Regulations (FARs), reportable to FAA per 49-CFR-830.”

Risk(s): 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.

Summary:

Summary Chart of Helicopter/Flight Accident or Incident (Annual)

Year	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Reportable Incidents	0	0	0	0	0	0	0	0	0	0

Metric Background:

SoCalGas’s Aviation Services Department (ASD) was formally established in January 2019 and is committed to upholding prudent safety practices and procedures for each aviation-related mission. ASD services include aerial methane mapping, aerial leak survey, pipeline patrol, aerial Light Detection And Ranging (LiDAR) and imagery, pole setting, Human External Cargo (HEC), and other construction-related activities in support of Gas Storage, Transmission,

and Distribution operations with crewed and uncrewed aircraft (drones). Crewed operations are primarily flown with rotary-wing aircraft and include scheduled regulatory compliance leak surveys, pipeline patrols, bridge and span inspections, aerial imagery, LiDAR data collections, and other aerial assessments; plus occasional external slung-load and human-external cargo.

SoCalGas's Aviation Operations Manual was developed to create a standard approach and language for SoCalGas flight personnel and all contractors who may conduct operations on behalf of SoCalGas. It contains information and instructions, such as how flight operations are to be conducted and the priorities and approaches to those operations. SoCalGas ASD's uncrewed flight operations are fully committed to continuing the same level of professional services, characteristic of crewed operations. ASD's mission for both its crewed and uncrewed flight operations is to coordinate safe and effective aviation services to internal Company departments and organizations requiring the use of aviation assets within the SoCalGas service territory. ASD carefully reviews subcontracted aviation asset service providers and verifies they meet SoCalGas ASD safety requirements for safe and professional aviation operations. When work in the SoCalGas service territory commences, ASD supports coordination and communication in planning and execution.

In addition, SoCalGas 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 for operational personnel directly involved in flight or ground support activities, periodic review of safety policies and objectives to verify they remain relevant and appropriate. Other important initiatives for ASD include random onsite safety observations of helicopter/field personnel, briefings by all contracted

service providers to pilots and ground support crew, and on-going hazard identification targeted at mitigating the risk created by increased numbers of drone and helicopter flights.

Federal Aviation Regulations (FARs) require reporting of accidents or incidents involving manned aircraft per 49-CFR-830. This data is incorporated in national aviation safety metrics compiled and reported by the Federal Aviation Administration (FAA). For reference, the national fatality rate for all helicopter operations (as of Oct 2023) was 0.73 deaths per 100,000 flight hours, with an FAA national goal to be below 0.55 fatal accidents per 100,000 flight hours for 2025.

Metric Performance:

In 2024 SoCalGas flew 1,697 crewed hours and 164 uncrewed (UAV) hours with no reportable incidents. From 2015 through 2024 SoCalGas has flown a total of 5,116 crewed hours and 457 uncrewed (UAV) hours without FAA-reportable incidents.⁶⁸

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

⁶⁸ 10-year total flight hours based on available records prior to 2019.

R. 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 requirement in 49 CFR Part 192, or the utility’s internal standards. Separate metrics are provided for gas distribution and gas transmission.”

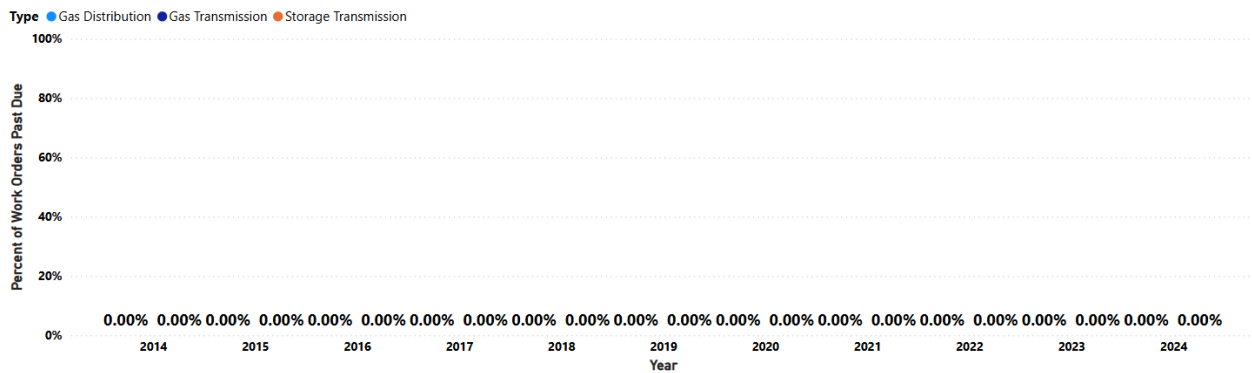
Risk(s): Gas Safety.

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)



Metric Background:

When SoCalGas becomes aware of an instance of non-compliance with Code of Federal Regulations, Title 49 or CPUC General Orders, the Company acts to investigate, rectify, and learn from, the matter as expeditiously as possible. 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 SoCalGas’s internal standards) as a percentage of total non-compliance corrective work orders in

a given calendar year. SoCalGas includes corrective actions resulting from various drivers, such as the Commission's Safety and Enforcement Division (SED) Notice of Probable Violations (NOPVs), SoCalGas Exception Self-Reports and Gas Safety Citation Program SoCalGas self-reports and provides such notifications in the calculation of this metric. 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 or self-reports were made to the SED.

Metric Performance:

SoCalGas continued to monitor and track completion of corrective actions within the scheduled and required timeframes through 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

S. 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 meet the conditions specified in GO 112-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.”

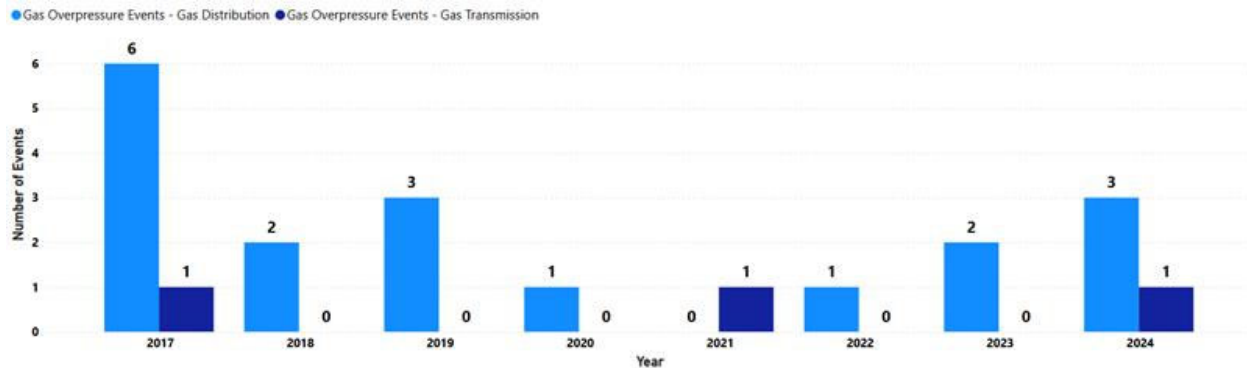
Risk(s): Gas Transmission and Distribution.

Category: Gas.

Units: Number of occurrences.

Summary:

Summary Chart of Gas Overpressure Events Metric Data (Annual)



Metric Background:

A key safety component for all pipelines is the establishment 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 (also referred to as “System MAOP”) cannot be greater than the lowest MAOP of any pipe segment operating within that system. Operating over the MAOP can lead to equipment damage, leaks, and hazardous conditions.⁶⁹ Each piping component and segment of the gas transmission and distribution systems are designed and operated based on this concept. The MAOP for a component or segment of piping is determined by its design and characteristics, and it is verified by testing. The component with the lowest Segment MAOP limits the MAOP for an entire

⁶⁹ 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>.

section of the gas system. 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. SoCalGas Gas Control’s real-time monitoring of the transmission system offers an additional critical level of control to ensure our pipelines do not exceed MAOP.

A CPUC-reportable overpressure condition is any event where the failure of a pressure relieving and limiting station, or any other unplanned event, results in pipeline system pressure exceeding its established MAOP plus the allowable build up set forth in 49 CFR § 192.201.

If the system’s MAOP is:	The 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

The overpressure reporting criteria went into effect in 2015 when GO 112-F was published. However, regulations were not enacted requiring external reporting of this data until 2017. SoCalGas began tracking this data in 2017 to comply with the new reporting requirements.

Metric Performance:

In 2024, SoCalGas recorded four reportable overpressure conditions (three in gas distribution and one in gas transmission) compared to two reportable overpressure conditions recorded in 2023.

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

A. 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.”

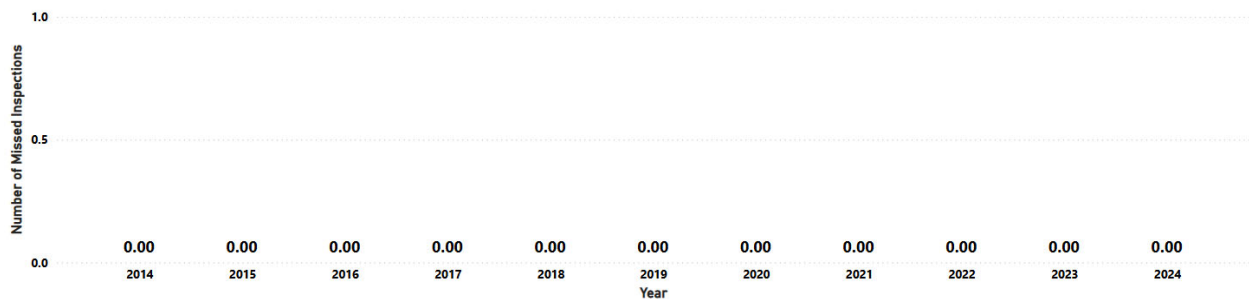
Risk(s): Catastrophic Damage Involving High-Pressure Pipeline Failure.

Category: Gas.

Units: Total number of missed inspections.

Summary:

Summary Chart of Gas In-Line Inspections Missed (Annual)



Metric Background:

As discussed for Metric No. 6 – Gas In-Line Inspection, 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.⁷⁰ 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. SoCalGas provides annual data for years 2015 through 2024 in the accompanying Excel file (Attachment B).

Metric Performance:

SoCalGas continues to manage inspections in accordance with federal regulations and has timely performed needed in-line inspections through 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

⁷⁰ 49 CFR §§ 192.710 and 192.939.

Attachment B

[Native/Excel file of 10 years of monthly historical data, where available, for all applicable metrics.]

Year	OH Transmission Conductor miles (M1, M2, M32)	OH Distribution Conductor miles (M1, M2, M32)	OH Conductor miles in HFTD (M4, M27)	OH Conductor miles in non- HFTD (M4)	Total miles of OH Conductor (M4)	Miles of gas Transmission Line (M6, M7, M13, M30)	Miles of gas Distribution Line (M30)	Total gas miles of Transmission with in- line upgrade (M7)	No of gas storage facilities (M12)	No of gas customer accounts (M20)	No of electric customer accounts (M20)	No. SCADA points in gas system monitoring for large OP events (M 30)
2015						3,485	99,586	60.11	4			-
2016						3,455	99,872	54.93	4			-
2017						3,448	101,317	1.24	4			-
2018						3,433	101,042	10.72	4			-
2019						3,385	99,600	5.26	4			-
2020						3,341	100,328	1.4	4			-
2021						3,440	101,625	11.9	4			-
2022						3,385	101,924	8	4			-
2023						3,381	103,454	5	4			-
2024						3,357	103,682	15.5	4			-