



General Order 166  
Emergency Response Plan  
Compliance Report for  
2024

April 30, 2025

## **GENERAL ORDER 166**

### **2024 COMPLIANCE REPORT**

**Purpose:** The Annual Report and Emergency Response Plan (“Report”) is to ensure SDG&E’s processes and procedures are established for emergencies and disasters in order to minimize response times and provide for service restoration and communications for the public during those emergencies and disasters. This Report has been developed, updated, and maintained in compliance with CPUC General Order (G.O.) 166 as modified by Decisions (D.) 98-07-097, D.00-05-022, D.12-01-032, D.14-05-020 and D.21-05-019. A proposed decision (PD) in the Grid Reliability Order Instituting Rulemaking (OIR) (R.) 24-05-023 is expected in the third quarter of 2025, which may incorporate updates to GO 166 reporting thresholds. The 2025 compliance report is expected to incorporate revisions to GO 166 reporting thresholds, pursuant to the anticipated R.24-05-023 decision. The period of compliance for this Report is the previous twelve months, ending December 31, 2024.

This Report has been updated and incorporates the requirements of the November 1, 2012, Memorandum of Emergency Reporting Guidelines from the Deputy Director of Safety and Enforcement Division (which revoked the previously applicable October 28, 2009, CPUC Energy Division Memorandum of Emergency Reporting Guidelines).

The Report is provided in compliance with Standard 11 of G.O. 166 and page 7 of D.98-07-097, which states: "We have adopted rules that require the utilities to provide us with general plans for responding to emergencies but do not implicitly require the utilities to present us with detailed procedural manuals."

**GENERAL ORDER 166**  
**STANDARDS 1-14**

**STANDARD 1**

**PREPARE AN EMERGENCY RESPONSE PLAN**

**AND**

**UPDATE THE PLAN ANNUALLY**

## Standard 1. Emergency Response Plan

### SDG&E's Compliance with Standard 1

*SDG&E's Company Emergency and Disaster Preparedness Plan (CEADPP) is provided as a separate document from the GO 166 Annual Compliance Report, as required by the November 1, 2012, Memorandum from the CPUC's Safety and Enforcement Division (SED; formerly Consumer Protection and Safety Division).*

*In compliance with Standard 1, SDG&E's Emergency and Disaster Preparedness Plan has been annually updated; changes from the prior year's Emergency and Disaster Preparedness Plan include updates to contact information and organizational revisions.*

#### A. Internal Coordination:

*When an emergency event occurs, SDG&E's Emergency Management (EM) department is responsible for determining the level of emergency, activating SDG&E's Emergency Operations Center (EOC), and notifying EOC responders of the emergency and EOC activation. Activation of an emergency event at Level IV through I initiates notifications to key departments and personnel that a significant event is forecasted or is in progress that may significantly affect the gas and electric system. At every Event Level, each department has specific responsibilities that allow SDG&E to prepare for and respond to such an event in an organized manner.*

*When an EOC Event Level III is activated for an electric commodity impacted incident, the Department Operations Center – Electric (DOC-E) will also be activated. Its purpose is to help coordinate the tactical response for the movement of crews, equipment, and material between districts, and to provide system-wide information to various groups. It provides electrical resource coordination and prioritization of resources allocated to the event.*

*The Customer Care Center ensures adequate staffing is in place to manage increased call volume.*

#### B. ISO/TO Coordination:

*SDG&E deals directly with the California Independent System Operator (CAISO). This procedure is under the overall jurisdiction of the CAISO. Proper and timely communication with the CAISO is required. See the CAISO's over-arching plan, 4610 – System Restoration, coordinated between the CAISO and its Transmission Owners and the CAISO's 4610D – SDG&E Blackstart and System Restoration Plan.*

#### C. Public Information Coordination (GO 166 says Media Coordination):

*SDG&E's Brand, Marketing & Communications team serves as Public Information Officer (PIO) upon activation of the Emergency Operations Center (EOC) and is responsible for providing timely and accurate information to customers, broadcast media, and employees. Information is disseminated through TV, print, radio news*

*outlets, social media channels, SDG&E's website and mobile app, SDG&E external-facing blog (SDGEtoday.com), stakeholders and community partners, and internal communication platforms. SDG&E uses a "OneVoice" communications strategy for all communications to internal and external stakeholders to ensure consistent messaging.*

**D. External and Government Coordination:**

*Guidelines have been developed for SDG&E's Emergency Management to report major electric and gas outage information for regulatory compliance and to support proactive communication links. Essential Customers, Public Safety Partners, and appropriate state and local government agencies receive updates regarding emergency events and progress of restoration through Emergency Operations Services.*

*SDG&E maintains lists of all partners, which are updated quarterly to ensure accuracy. The updates are internally conducted each quarter and supported through data collected through an annual functional notifications group exercise as well as an annual meeting of the regional partners. Additionally, a live link is provided to partners annually where they can update real-time as changes are made in their organization.*

*Consistent with Standardized Emergency Management System (SEMS) and Federal Emergency Management Agency (FEMA National Incident Management System (NIMS) which includes the Incident Command System (ICS) Framework, SDG&E's Company Emergency and Disaster Preparedness Plan addresses how they are applied to our planning documents to include, but not limited to the following ICS principles:*

- *Common terminology*
- *Establishment and transfer of command*
- *Chain and unity of command*
- *Unified command*
- *Management by objectives*
- *Modular organization*
- *Incident action planning*
- *Manageable span of control*
- *Incident locations and facilities*
- *Comprehensive resource management*
- *Integrated communications*
- *Information and intelligence management*
- *Effective accountability*

- *Dispatch/deployment*

## REPORTING PROCEDURES

*Notification to Emergency Management of an emergency could come from an Operational Department Director or their designee, District Manager, Media Communications, the Customer Care Center, or First Responder Agencies.*

*The 24/7 Emergency On-Duty (EOD) employee is responsible for obtaining accurate incident information and contacting Emergency Management leadership. The designated EOD has an Emergency Management on-duty phone number, text capability, and email that provides the mechanisms for receiving and alerting SDG&E Emergency Management of an incident. The EOD will contact the notifying party within 30 minutes, obtain relevant information, follow incident action requirements in the EOD Binder, and contact the Emergency Operations Services Manager, who will instruct the EOD of any additional notifications and/or actions to take.*

*If the EOC is activated, then each of the emergency contacts on the agency listing below will be notified of the activation and will be provided follow up information at a reasonable frequency throughout the event. The EOD will develop and maintain records of initial contact and each subsequent contact as necessary.*

*The exception is the CPUC, who is contacted by SDG&E's Regulatory compliance/claims departments when reporting criteria are met.*

### ***Agency Listing***

- California Energy Commission (CEC) 916-654-4287
- California Public Utilities Commission (CPUC) 800-235-1076 (reporting hotline, leave message)
- CalOES California State Warning Center (CSWC) 916-845-8911
- California Utilities Emergency Association (CUEA) Executive Director 916-845-8518
- County of San Diego Office of Emergency Services 858-565-3490
- County of Orange Office of Emergency Services 714-628-7050

### **E. Wildfire Mitigation Plan:**

*In October 2018, the CPUC opened R.18-10-007 to implement the provisions of Senate Bill 901 related to electric utility Wildfire Mitigation Plans. Through that proceeding and guidance from the CPUC's Wildfire Safety Division (WSD), SDG&E submits its Wildfire Mitigation Plan (WMP) on a triennial basis, with annual updates on progress and performance. The WSD transitioned from the CPUC to the Office of Energy Infrastructure Safety (OEIS) in July, 2021. In October 2023, OEIS approved SDG&E's 2023-2025 WMP and the CPUC subsequently ratified OEIS's decision in November 2023 per Public Utilities Code Section 8386(a) by Resolution SPD-16. SDG&E's WMP addresses the requirements of the FPP, as prescribed by GO 166, Standard 1.E and Decisions*

*12-01-032 and 14-05-020. As such, SDG&E is attaching its 2023-2025 WMP to this report as Appendix 1.*

F. Safety Considerations:

*SDG&E Construction & Operations (C&O) Centers are responsible for the repair and restoration of service in their district, damage assessment, coordination with the Electric Distribution Emergency Operations Desk, and the management of resources and equipment necessary to restore service as quickly and safely as possible.*

*The C&O Center Manager is responsible for the repair and restoration of service within their district boundary.*

*The District Assessment Coordinator is responsible for:*

- Assessment of overall damage to the district;*
- Call out for primary and secondary assessors (a.k.a. fielders);*
- Assigning personnel to assess damage;*
- Prioritizing emergencies; and*
- Making sure expectations are clear to fielders and ensuring fielders are briefed on safety. Fielders are to understand that wires down or exposed conductors are to be considered energized unless identified, isolated, tested dead, and grounded. They should be informed that downed or exposed conductors could become energized without warning in storm conditions or other emergencies. Fielders should ensure that the public does not go near downed or exposed power lines or equipment.*

*Additionally, SDG&E has developed a Field Safety Officer program which is responsible for safety at field incidents. Those certified as Field Safety Officers must complete training equivalent to FEMA's L0954: NIMS ICS All-Hazards Safety Officer course.*

G. Damage Assessment:

*System-wide damage assessment at the onset of the emergency or disaster is extremely important and the information can be difficult to collect. A network software application called Oracle Utilities Network Management System is being utilized to assist with this process and to provide estimated restoration times. The District Assessment Coordinator is responsible for immediately assigning resources to the damage assessment process. Personnel may include, but are not limited to: Electric Troubleshooter, Working Foremen, Linemen, Construction Supervisor, Project Coordinators, and Planners.*

*Once the assessment is completed, the assessment is updated on either the Oracle Utilities Network Management System or the Service Order Routing Technology (SORT) application. The updated information is passed to the Oracle Storm Management application within the Oracle Utilities Network Management System and Oracle Utility Analytics. The purpose of utilizing these systems is to provide data on current and completed backlog to the Distribution Electric Emergency*



*Operations Desk so that assessment of system-wide damage can be accomplished, and staffing levels can be adjusted accordingly.*

H. Restoration Priority Guidelines:

*Restoration guidelines include consideration of the following:*

- *Emergencies (life threatening);*
- *Special cases and critical facilities (as defined by Operations Manager) to include;*
  - *Critical Customers*
  - *Customers who self-identify as Access and Functional Needs populations*
  - *Essential Customers*
  - *Public Safety Partners*
- *Primary Electric Outages: Generally, set assessment and restoration priorities to restore service first to critical and essential customers, and so the largest number of customers receive service in the shortest amount of time;*
- *Non-Primary Electric Outages: Emergency Agencies standing by and equipment damage not related to primary outages;*
- *Transformer Outages; and*
- *Single-No-Light outages.*

I. Mutual Assistance (inbound to SDGE):

*SDGE's Officer-in-Charge (OIC) will:*

- *Notify Emergency Services that mutual assistance is being considered and request that informal inquiries to other utilities be made;*
- *Determine resource needs from discussions with the districts, the outage forecast data, the weather/storm forecast, and resource shortages; and*
- *Hold discussions with SDG&E's Vice President of Electric System Operations, Senior Vice President of Electric Operations, the Director(s) of Electric Operations, the Director of Construction Management, the Manager of Emergency Services and the Director of Emergency Management to determine the need for mutual assistance and obtain approval to request.*

*Considerations triggering these discussions include, but are not limited to:*

- *Concurrent outage impacts nearing ten percent of SDG&E's electric customers;*
- *When forecasted outage duration exceeds 24 hours, discussion for mutual assistance is initiated and decisions are documented;*
- *Storm impact intensity is forecasted to last another 48 hours;*
- *All SDG&E crew resources have been or will be committed;*
- *All local contract crews have been or will be committed.*

J. Plan Update:

*This general plan has been adjusted for changes made since the last submittal and addresses the requirements of D.98-07-097, D.00-05-022, and D.12-01-032, as well as the latest CPUC reporting guidelines from the November 1, 2012 SED (formerly CPSD) Memorandum. Procedural manuals are updated as required to conform to this general plan.*

*The plan is reviewed annually to meet changes in regulatory requirements and recommendations resulting from training, exercises, organizational revisions, and after-action reports. Every 3 years a full document review with stakeholder input is conducted. The plan development also follows FEMA Comprehensive Guide 101 (CPG 101 v3). As such, SDG&E is attaching its Company Emergency and Disaster Preparedness Plan (Public) to this report as Appendix 2 revised 12/2024.*

**STANDARD 2**

**ENTER INTO  
MUTUAL ASSISTANCE AGREEMENTS  
WITH OTHER UTILITIES**

Standard 2. Mutual Assistance Agreement(s)

SDG&E's Compliance with Standard 2

*SDG&E has three Mutual Assistance Agreements for the following areas/regions:*

- (1) California: See Appendix 4 for Mutual Assistance Agreement Among Members of the California Utilities Emergency Association (CUEA)*
- (2) Western U.S.: See Appendix 5 for Western Region Mutual Assistance Agreement for Electric and Natural Gas Utilities*
- (3) Nationwide: See Appendix 6 for Edison Electric Institute Mutual Assistance Agreement*

*During the reporting period, SDG&E did not request or receive mutual assistance.*

**STANDARD 3**

**CONDUCT ANNUAL EMERGENCY TRAINING  
AND EXERCISES USING THE UTILITY'S  
EMERGENCY RESPONSE PLAN**

### Standard 3. Emergency Training and Exercise

*The utility shall conduct an exercise annually using the procedures set forth in the utility's emergency plan. If the utility uses the plan during the twelve-month period in responding to an event or major outage, the utility is not required to conduct an exercise for that period.*

#### SDG&E's Compliance with Standard 3

*SDG&E activated its plan for the following incidents in 2024*

- *CEMA Rain Storm 02/03/2024-XXX*
- *November PSPS Event 11/3/2024-11/8/2024*
- *December PSPS Event 12/6/2024-12/11/2024*

*SDG&E activated its plan for the following exercises in 2024*

- *2024 PSPS Exercise Series TTX 4/11/2024*
- *2024 PSPS Exercise Series FE 5/13/2024-5/16/2024*
- *Leadership Cyber TTX 5/23/2024*
- *DOC-G TTX 6/6/2024*
- *Cyber OT TTX 8/14/2024*
- *Earthquake TTX 9/5/2024*
- *Earthquake FE 11/13/2024*
- *San Diego City WUI TTX 9/6/2024*
- *Navy Blackstart TTX 9/25/2024*
- *PSPS CBC and PIO TTX 10/14/2024*
- *PSPS Meteorology and Notification TTX 10/11&21/2024*

*SDG&E conducted PSPS Tabletop and Full-Scale training exercises on 4/11/2024, and 5/13/2023-5/16/2023 which were attended by representatives from the San Diego County Office of Emergency Services (SD County OES), CalOES, and the CPUC.*

*SDG&E conducted an earthquake tabletop and functional exercise series on 9/5/2025 and 11/13/2025 which was attended by representatives from SDG&E and SoCal Gas.*

*SDG&E requires all EOC responders to complete basic ICS, NIMS, and SEMS training and has set a target to have EOC Command and General staff achieve Utility Representative EOC Position Credentialing from CalOES. See table below for training requirements. Additionally, SDG&E trains all responders in Summer Readiness (including review of PSPS and Load Curtailment protocols), and in company-specific courses and briefings.*

EOC Role Type	Required G Series & SEMS Training	Required ICS Training	Required NIMS Training
All Responders	SEMS G606	IS Intro to ICS IS 200 Basic ICS for Initial Response	IS 700 NIMS
EOC Command & General Staff	SEMS 606 G 611 EOC Section Overview (L,M,O,P,F) G 626E EOC Action Planning G 775 EOC Mgmt & Ops	IS 100 Intro to ICS IS 200 Basic ICS for Initial Response G 191 ICS/EOC Interface	IS 230 Fundamentals of Emergency Management G 197 Integrating AFN into Emergency Management (or IS 368) IS 700 NIMS IS 706 NIMS Intrastate MA IS 800 National Response Framework, an Intro.

**STANDARD 4**

**DEVELOP A STRATEGY  
FOR INFORMING THE PUBLIC  
AND RELEVANT AGENCIES  
OF A MAJOR OUTAGE**



#### Standard 4. Communications Strategy

##### SDG&E's Compliance with Standard 4

*SDG&E's Communications Strategy is set forth below:*

A. Customer Communications: Public Information Office (PIO) and Customer Care Center

*SDG&E's Public Information Office owns and manages a Crisis Communications Plan, outlining public-facing communications strategies before, during and after a major outage or emergency. Some tactics are listed below; however, for additional information, please see Appendix 3 for the Crisis Communication Plan.*

*The Customer Care Center starts to obtain emergency damage data during the Event Level III alert and continues through the completion of the emergency.*

*During Events Level II or I, the Customer Care Center will dispatch a representative to the Electric Distribution Emergency Operations Desk to coordinate outage data for the Care Center.*

*SDG&E has several communications tools to expedite the delivery of emergency information to media and customers, including:*

- SDG&E partners with the local emergency broadcast radio station, KOGO-AM, to place emergency ads, which can air within 2–3 hours of a request. Additionally, the radio station is prepared to provide news coverage, as merited by the situation.*
- The PIO will issue media advisories and/or press releases, as appropriate, post situation updates on SDGE Today, the external-facing blog website, and respond to media inquiries, including any received through SDG&E's 24-hour media hotline. Additionally, when appropriate, proactive calls will be made to local television, radio, and print news outlets with situation updates.*
- The PIO Section provides situation updates on SDG&E social media channels, including X (formerly known as Twitter), Facebook, Instagram, and Nextdoor.*
- An outage map is accessible via SDGE.com. The outage map provides information related to active outages on SDG&E's electric system. The outage map includes details on the affected communities, outage cause, number of impacted customers, and estimated time of restoration. The outage map and similar information can also be accessed through SDG&E's mobile app, Alerts by SDGE.*

- *SDG&E partners with the network of local government agencies responsible for alert and warning in communities and coordinates with Public Safety Partners to maximize outreach efforts.*
- *SDG&E contacts critical customers, medical baseline customers, and customers with Access and Functional Needs (AFN), at least annually, to ensure customers have provided SDG&E with up-to-date emergency contact information.*
- *SDG&E partners with Public Safety Partners, local jurisdictions, tribes, and Community-Based Organizations (CBOs) to identify and support individuals with Access and Functional Needs (AFN) before, during, and after an emergency or disaster.*

*SDG&E's communication strategy leverages the Public Safety Power Shut-off (PSPS) Guidelines where it is feasible and appropriate. For example, in a major outage caused by an earthquake or other no-notice disaster or emergency type, it is not possible to provide advanced notice per the PSPS Guidelines.*

#### **B. External and Government:**

*Guidelines for Emergency Operations Services exist to report major electric and gas outage information for regulatory compliance and to support proactive communication links. Local and state agencies may initiate the California Standardized Emergency Management System (SEMS) during an emergency, which will coordinate the agencies' activities.*

#### **REPORTING PROCEDURES**

*Notification to Emergency Management of an emergency could come from an Operational Department Director or their designee, District Manager, Media Communications, the Customer Care Center, or First Responder Agencies.*

*The 24/7 Emergency On-Duty (EOD) employee is responsible for obtaining accurate incident information and contacting Emergency Management leadership. The designated EOD has an Emergency Management on-duty phone number, text capability, and email that provides the mechanisms for receiving and alerting SDG&E Emergency Management of an incident. The EOD will contact the notifying party within 30 minutes, obtain relevant information, follow incident action requirements in the EOD Binder, and contact the Emergency Operations Services Manager, who will instruct the EOD of any additional notifications and/or actions to take.*

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- *County of San Diego Office of Emergency Services 858-565-3490*
- *County of Orange Office of Emergency Services 714-628-7050*

**C. Independent System Operator (ISO) / Transmission Owner:**

*SDG&E deals directly with the California ISO (CAISO). This procedure is under the overall jurisdiction of the CAISO. Proper and timely communication with the CAISO is required. See ISO Operating Procedure 5110.*

**STANDARD 5**

**COORDINATE INTERNAL ACTIVITIES**

**DURING A MAJOR OUTAGE**

**IN A TIMELY MANNER**

## Standard 5. Activation Standard

### SDG&E's Compliance with Standard 5

*SDG&E's Activation Standard is set forth below for the Emergency Operations Center (EOC) to be activated within one hour.*

*The criteria used to define the Level of EOC activation for an incident for SDG&E includes hazard-specific conditions and business impacts such as:*

- *Number of customers affected*
- *Resources deployed to address the incident*
- *Estimated time of restoration (ETR)*
- *Facilities or systems impacted*
- *Workforce impact*
- *Financial impact*
- *The extent of media and political external interest*
- *Company reputational issues*

*The incident types and the descriptors for each are intended to be used as guidelines for preparedness and response planning. There is a difference in how we classify an incident or event type based on its impact to the company and the EOC activation, staffing and subject matter experts in work areas required to resolve the situation.*

*The incident or event is assessed to determine its impact on the company's ability to safely deliver commodity services to customers, maintain a proper workforce environment, manage company facilities and resources, and fulfill regulatory obligations. The larger the negative impact to these functions or disruption of services, the greater the resources required to repair or restore those services. The company response may range from a simple executive notification about the incident, which usually can be accommodated within a couple of days by field crews, to an EOC activation Level 1 which is catastrophic and may need external mutual assistance and months to restore.*

*In other words, a Level 1 incident classification has the potential to exceed SDG&E's authority and/or financial capability to resolve. As the severity of an incident increases, the financial impact to the company expands accordingly and can extend to the Sempra stakeholders where we would coordinate with the Sempra Headquarters Incident Center through the SDG&E Executive Management Team (EMT) leadership decision process.*

*The EOC activation levels are determined by the authority, skill level, and company resources required to effectively manage the incidents or events impacting the company. It is how the Emergency Management leadership group (EM Advisor, EM Director, and Officer in Charge), and its staff, will expand to*

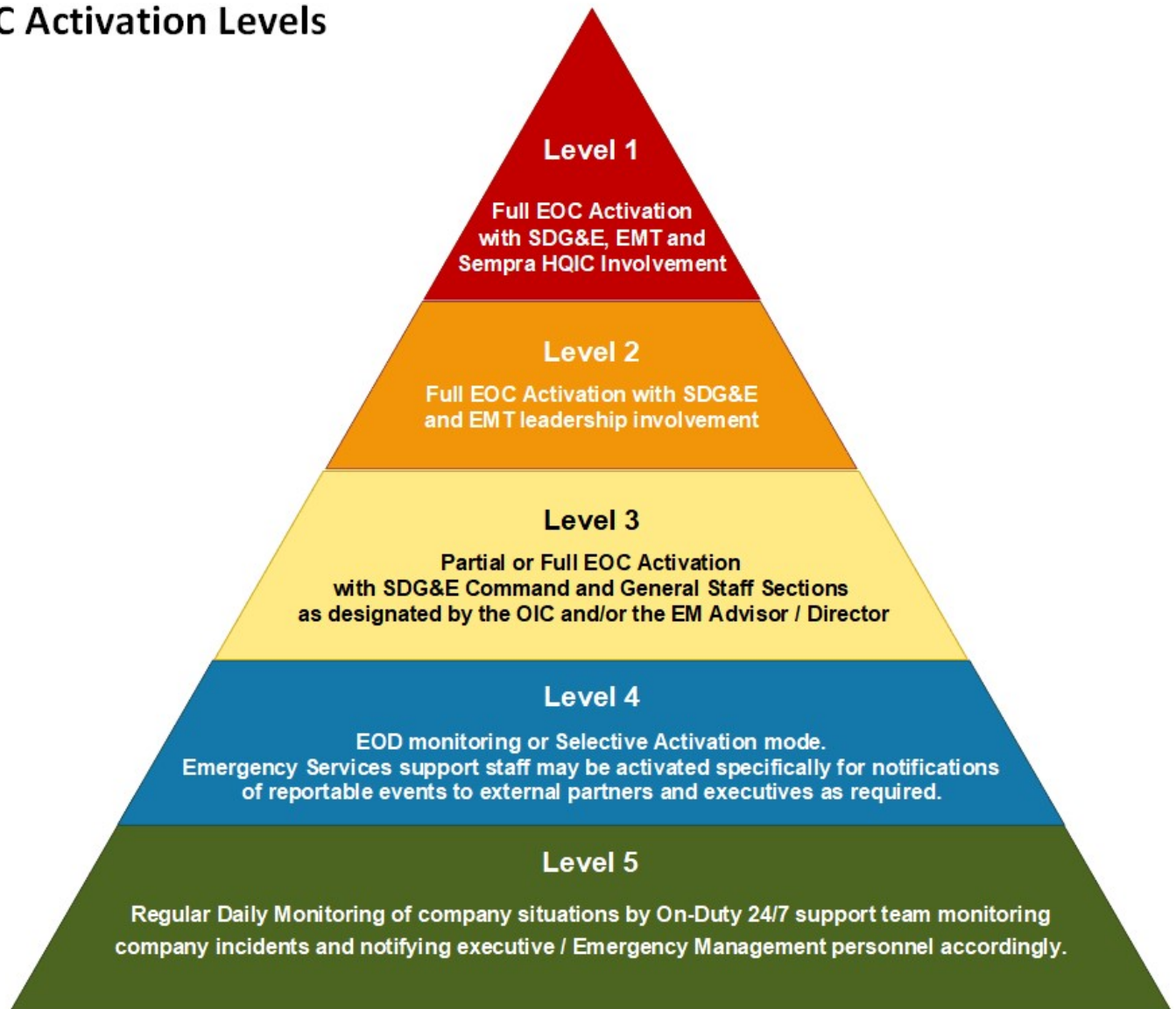
meet the response situation as follows:

- **Level 5: Green, EOC not activated** – Regular Daily Monitoring of company situations by the Emergency On-Duty (24/7) support team monitoring company incidents and notifying executive / Emergency Management personnel accordingly. Does not require activation of the EOC. There is no expectation of reputational or financial exposure from this incident.
- **Level 4: Active Monitoring, Blue, EOC monitoring or Partial Activation mode.** – An incident or operating condition that could limit the company's ability to meet customer demand, damage company assets, or disrupt business processes. The number of affected customers or systems issues can be managed within company resources. Emergency Service support staff may be activated to notify external partners and executives of reportable events as required.
- **Level 3: Serious, Yellow, Partial or Full EOC activation with SDGE Command and General Staff sections as designated by the OIC and/or EM Advisor.** – An incident that decreases the ability to meet customer demand or carry-out critical business processes. An area-wide or higher profile incident involving a significant number of customers, affecting multiple company businesses, and/or resolution may require more resources than available within the company. The incident may draw media, regulatory and governmental interest, and questions. Reputational damage could occur if the response is not addressed effectively and timely. Financial exposure will be limited. SDG&E Command and General Staff sections as designated by the Officer in Charge and/or the EM Advisor. EOC positions can be partially or fully staffed, (virtually or physically) as necessary to support the incident.
- **Level 2: Severe, Orange, Full SDG&E EOC Activation including the Executive Management Team - EMT** – A Level 2 incident significantly impacts the company, requiring resources from across the organization to restore services and maintain operations. Additional non-company resources may also be needed to support recovery efforts. This level of incident may affect a large number of customers, leading to a high volume of customer inquiries. Employees' families may be impacted, and facilities may need to be evacuated. There will be increased and ongoing media attention, and government entities and regulators will require continuous updates on the company's preparedness, response, and recovery status. The incident may pose reputational and financial risks. The EOC response positions are fully staffed (in person or virtually), and appropriate DOCs are activated. EMT or mutual aid assistance may be necessary. This level of activation is typically required when multiple companywide departments are affected or when there are significant disruptions to commodity services, but it does not meet the criteria for catastrophic loss or damage to company assets. The EOC staff is fully engaged with senior leadership, and the severity of the events is within the company's area of responsibility and resources to resolve.
- **Level 1: Catastrophic, Red, Full SDG&E EOC activation and Sempra Headquarters Incident Center (HQIC) coordination** – A Level 1 incident is highly disruptive to a wide range of operational and business processes, both

*within the company and the communities it serves. Resources may need to be drawn from outside the region, including from other states. Coordinating the company's response across the service territory will be essential. This incident will involve significant financial exposure and potential reputational damage. It will attract national media attention and scrutiny from state and federal agencies, regulators, and political leaders. The EOC will be fully staffed, and appropriate DOCs will be activated. EMT involvement and coordination with Sempra HQIC may be required.*

*The following EOC activation level diagram in this section illustrates the criteria that SDG&E will use to characterize the response management requirements.*

## EOC Activation Levels





**STANDARD 6**

**NOTIFY RELEVANT INDIVIDUALS  
AND AGENCIES  
OF AN EMERGENCY OR MAJOR OUTAGE  
IN A TIMELY MANNER**

## Standard 6. Initial Notification Standard

### SDG&E's Compliance with Standard 6

*SDG&E's Initial Notification Standard is set forth below:*

*Guidelines for Emergency Services exist to report major electric and gas outages for regulatory compliance and to support proactive communication links. Within one hour of the identification of a major outage or other newsworthy event, SDG&E shall notify the CPUC, affected Essential Customers, and the CalOES Warning Center of the location, possible cause, and expected duration of the outage. The CalOES Warning Center is expected to notify other state agencies of the outage. SDG&E will notify San Diego County OES, who will notify other local agencies and affected Public Safety Partners. Later contacts between state and local agencies and SDG&E shall be conducted between personnel identified in advance, as set forth in Standard 4.B. Sometimes, the CPUC staff may issue instructions or guidelines regarding reporting.*

### REPORTING PROCEDURES

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- *CalOES California State Warning Center Warning Center (CSWC) 916-845-8911*
- *California Utilities Emergency Association (CUEA) Executive Director 916-845-8517*
- *County of San Diego Office of Emergency Services 858-688-9970*
- *County of Orange Office of Emergency Services 714-628-7054*

### ***Guidelines for Notification to the CPUC of Emergency or Urgent Events***

#### **I. References**

*G.O. 166: Standards for Operation, Reliability, and Safety during (Electric) Emergencies and Disasters.*

*Per General Order No. 166*

*PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA*

*Standards for Operation, Reliability, and Safety*

*During Emergencies and Disasters*

*Adopted July 23, 1998. Effective July 23, 1998.*

*(D.98-07-097 in R.96-11-004)*

*Revised May 4, 2000 Effective May 4, 2000*

*(D.00-05-022 in R.96-11-004)*

*Revised January 12, 2012 Effective by January 12, 2012*

*(D.12-01-032 in R.08-11-005)*

*Revised May 15, 2014 by D.14-05-020 in R.08-11-005*

*Revised December 14, 2017 by D.17-12-024 in R.15-05-006*

*Revised May 20, 2021 by D.21-05-019 in R.15-06-009*

*This Report has been developed, updated, and maintained in compliance with CPUC General Order (G.O.) 166 as modified by Decisions (D.) 98-07-097, D.00-05-022, D.12-01-032, D.14-05-020 and D.21-05-019.*

*This Plan is to ensure SDG&E's processes and procedures for emergencies and disasters are established to minimize response times and provide for service restoration and communications for the public. This report has been developed, updated, and maintained in compliance with G.O. 166 and the November 1, 2012 SED Memorandum. The period for this report is the previous twelve months ending December 31, 2024.*

## II. How to Report Emergency Reporting

*Electric and gas incidents, emergencies, and power plant safety-related incidents are reported via the CPUC online form:*

- <https://ia.cpuc.ca.gov/safetysafetyevents/>

*Electric utilities report major electric outages via the CPUC online form:*

- <https://ia.cpuc.ca.gov/electricincidents/>

*If the online form is unavailable, but internet access is available, electric and gas incidents, emergencies, and major outages should be reported via email to the following CPUC staff:*

- Safety Enforcement and Policy Division Deputy Executive Director, (vacant at the time of this filing)
- SED Director, Leslie “Lee” Palmer, at [leslie.palmer@cpuc.ca.gov](mailto:leslie.palmer@cpuc.ca.gov)
- SED Program and Project Supervisor, Fadi Daye, at [fadi.daye@cpuc.ca.gov](mailto:fadi.daye@cpuc.ca.gov)

*If internet access is unavailable, notify the CPUC via the telephone hotlines:*

- Gas or Electric Incidents: 800-235-1076
- Power Plants: 415-355-5503

*If the hotlines’ voicemail systems are not in service, notification will be made to the following SED personnel:*

- Lee Palmer at 415-703-2369, or Fadi Daye at 213-598-7439

### Notification of Significant Grid Events

*The CAISO will continue its current practice to notify CPUC Offices, Directors and key staff of significant grid events (Alerts, Warnings, and Emergencies) by email.*

*If SDG&E is directed by CAISO to shed load due to an Emergency event, SDG&E will provide notification via the online form and by email to the following general mailbox and CPUC Energy Division (ED) personnel:*

- Electric Safety & Reliability Branch at [ESRB\\_ComplianceFilings@cpuc.ca.gov](mailto:ESRB_ComplianceFilings@cpuc.ca.gov)
- Executive Director, Rachel Peterson, at [rachel.peterson@cpuc.ca.gov](mailto:rachel.peterson@cpuc.ca.gov)
- Interim Director for Procurement, Efficiency, and Electrification, Molly Sterkel, at [merideth.sterkel@cpuc.ca.gov](mailto:merideth.sterkel@cpuc.ca.gov)
- Interim Program Manager, Electric Planning and Market Design Branch, Nathan Barcic, at [nathan.barcic@cpuc.ca.gov](mailto:nathan.barcic@cpuc.ca.gov)

*SDG&E will notify CPUC Offices, Directors and key staff of imminent or planned curtailment of interruptible customer load and rotating outages of firm load, whether ordered by the CAISO (Emergency Stages 2 or 3) or made necessary by other emergencies. Notification will be made via the online form and by email to the following:*

- *Electric Safety & Reliability Branch at [ESRB\\_ComplianceFilings@cpuc.ca.gov](mailto:ESRB_ComplianceFilings@cpuc.ca.gov)*
- *Executive Director, Rachel Peterson, at [rachel.peterson@cpuc.ca.gov](mailto:rachel.peterson@cpuc.ca.gov) Interim Director for Procurement, Efficiency, and Electrification, Molly Sterkel, at [merideth.sterkel@cpuc.ca.gov](mailto:merideth.sterkel@cpuc.ca.gov)*

*Notifications should specify the start time, anticipated duration, and impacted areas (city/county or community).*

### III. What to Report and When

#### **Major Utility Reporting Requirements (GO 166) Definitions:**

*Emergency or Disaster: An event which is the proximate cause of a major outage, including but not limited to storms, lightning strikes, fires, floods, hurricanes, volcanic activity, landslides, earthquakes, windstorms, tidal waves, terrorist attacks, riots, civil disobedience, wars, chemical spills, explosions, and airplane or train wrecks.*

*Major Outage: Consistent with Public Utilities Code Section 364, a major outage occurs when 10 percent of the electric utility's serviceable customers experience a simultaneous, non-momentary interruption of service. For utilities with less than 150,000 customers within California, a major outage occurs when 50 percent of the electric utility's serviceable customers experience a simultaneous, non-momentary interruption of service.*

*Follow the guidelines below for initial reports of Electric System Emergencies and Urgent Events. For emergencies that last more than 24 hours, please provide an update by 9 am each business day until the emergency is resolved. For reports required within one hour, please provide follow up reports as practicable, but at least once every four hours, during the business day.*

#### **ELECTRIC EMERGENCIES AND URGENT EVENTS**

- 1. Imminent or planned implementation of interruptible electric load curtailments or rotating outages of firm electric load by your utility, either ordered by the CAISO (Stage 2 or 3 Alert) or necessitated by other emergencies.*

*Notify the CPUC as soon as possible every time you interrupt new blocks of circuits. Notification should include:*

- Start time and anticipated duration of curtailments or rotating outages;*
  - Interruptible load or firm load rotating outage blocks/groups and sub blocks/groups to be interrupted;*
  - Total amount of interruptible load curtailments or firm load outages and major locations (counties and cities) of firm load to be interrupted;*
  - Contact person for the emergency, with contact numbers.*
- 2. Outage of electric service expected to accrue to over 300,000 customer hours, or exceeding 300 megawatts of interrupted load, or affecting more than 10% of your electric customers. (For utilities with fewer than 150,000 customers in California (small utilities), report when 50% of your customers are affected or 30,000 customer hours of interruption are expected to accrue.)*

*Notify us within one hour. Please report:*

- Possible cause of the outage, time and location of the initiating event;*
- Approximate number and location (by county/city) of customers affected;*

- *Work necessary to restore service;*
  - *Estimated time of service restoration;*
  - *Your contact person for this emergency, with contact numbers.*
3. *An emergency, involving your facilities or personnel, likely to be reported statewide or in more than one major media market.*

*Notify the CPUC within one hour. Notification should include:*

- *What happened, where, when, and how;*
  - *Any impacts on electric service;*
  - *Any injuries, hospitalizations, or casualties;*
  - *Any property damage;*
  - *Steps being taken to resolve the emergency;*
  - *Time the situation is expected to return to normal;*
  - *Your contact person for this emergency, with contact numbers.*
4. *Interruptions to bulk power supply (generators, transmission lines, or other equipment controlled by you) that are likely to lead to a CAISO declared Stage 2 or 3 Alert on or before the next business day.*

*Notify the CPUC within one hour. Notification should include:*

- *The cause of the interruption, time and location of initiating event;*
  - *Factors that would mitigate or worsen the emergency;*
  - *Location and number of customers potentially affected;*
  - *The expected duration of the low capacity situation;*
  - *Your contact person for this event, with contact numbers.*
5. *An electric outage affecting more than 30,000 customers, or lasting over 24 hours for 2,500 customers, or expected to total over 60,000 customer hours, or a situation (such as floodwaters threatening a substation) likely to lead to such an outage. (Small utilities shall report outages affecting 3,000 customers or lasting over 24 hours for more than 250 customers or are expected to accrue to more than 6,000 customer hours.)*

*Notify the CPUC by 9 a.m. the next business day. Notification should include:*

- *The cause and time of the interruption;*
- *Name and location of facilities affected;*
- *Starting and end times of the outage;*
- *Location (by county and city) and number of customers affected;*
- *Number of customers for whom the outage exceeded four hours;*
- *If the outage is ongoing, when service will be restored;*
- *Your contact person for this event, with contact numbers.*

6. *Electric outages associated with OES declared states of emergency, not otherwise reportable under above criteria.*

*Notify the CPUC as soon as possible. Notification should include:*

- *Cause of the outage;*
- *Starting and end times of the outage;*
- *Location (by county and city) and number of customers affected;*
- *Number of customers for whom the outage exceeded four hours;*
- *If the outage is ongoing, when service will be restored;*
- *Movements of emergency crews between regions;*
- *Mutual assistance requests to other utilities;*
- *Your contact person for this event, with contact numbers.*



**STANDARD 7**

**EVALUATE THE NEED  
FOR MUTUAL ASSISTANCE  
DURING A MAJOR OUTAGE**

## Standard 7. Mutual Assistance Evaluation

### SDG&E's Compliance with Standard 7

*No more than 4 hours after the onset of a major outage, SDG&E will begin the process of evaluating and documenting the need for mutual assistance.*

*The SDG&E Officer in Charge (OIC) will, with the EOC support:*

- *Notify Emergency Operations Services that mutual assistance is being considered and request informal inquiries to other utilities be made;*
- *Determine resource needs from discussions with the districts, the outage forecast data, the storm forecast and resource shortages;*
- *Hold discussions with the Vice President of Electric System Operations, the Senior Vice President of Electric Operations, Director of Electric Operations, Director of Construction Services, Manager of Emergency Services and the Emergency Operations Services' Representative regarding the need for mutual assistance and obtain approval to request.*

*Considerations triggering these discussions include, but are not limited to:*

- *All SDG&E crew resources have been or will be committed;*
- *All local contract crews have been or will be committed;*
- *The restoration times for primary outages are forecast for 24 to 36 hours;*
- *Storm intensity is forecast to last another 48 hours;*
- *Concurrent outage impacts nearing ten percent of SDG&E's electric customers;*

*It is the standard procedure during an EOC activation for a major event to evaluate as soon as possible if there would be a need for mutual assistance.*

*During the 2024 reporting period SDG&E did not provide Mutual Assistance to other utilities.*

**STANDARD 8**

**INFORM THE PUBLIC**

**AND**

**RELEVANT PUBLIC SAFETY AGENCIES**

**OF THE ESTIMATED TIME**

**FOR RESTORING POWER**

**DURING A MAJOR OUTAGE**

## Standard 8. Major Outage and Restoration Estimate Communication Standard

### SDG&E's Compliance with Standard 8

*SDG&E's major outage and restoration estimate communication plan is set forth below.*

- A. *During regular operations, SDG&E leverages automated estimated restoration times based on historical restoration averages on a per circuit basis. During storms, PSPS or any other major event, automated restoration times are disabled and a manual estimated restoration time is created based on the best information available at the start of the event. This includes, but is not limited to, size, scope and type of event, meteorological forecasts, and any other relevant information obtained from community partners and/or first responder agencies.*

*System-wide damage assessment at the onset of the emergency is extremely important and the information can be difficult to collect. The Damage Assessment program has been developed to assist this process and provide estimated restoration times.*

*The Customer Care Center (CCC) starts to obtain emergency damage data during the Event Level II and continues through the completion of the emergency. During Event Level III or IV, the CCC will work with Electric Distribution Emergency Operations to coordinate outage data for the CCC. This ensures data availability well in advance of the G.O. 166 requirement of within four hours of the identification of the major outage.*

*SDG&E has several communications tools to expedite the delivery of emergency information to media, affected essential customers, and state and local public agencies, including:*

- SDG&E partners with the local emergency broadcast radio station, KOGO-AM, to place emergency ads, which can air within 2–3 hours of a request. Additionally, the radio station is prepared to provide news coverage, as merited by the situation.*
- The PIO Section will issue media advisories and/or press releases, as appropriate, posts situation updates on the SDGE Today website and respond to media inquiries, including any received through SDG&E's 24-hour media hotline. Additionally, when appropriate, proactive calls will be made to local television, radio, and print news outlets with situation updates.*
- The PIO Section provides multimedia situation updates on SDG&E digital/social media channels, including X (formerly Twitter), Facebook, Instagram, and Nextdoor. All outages and estimated restoration times are communicated through SDG&E's website and the Alerts by SDG&E mobile app. An outage map is accessible via SDGE.com. The outage map provides information related to active outages on SDG&E's electric system. The outage map includes details on the affected communities, outage cause,*

*number of impacted customers, and estimated time of restoration. The outage map and similar information can also be accessed on the Alerts by SDG&E mobile app. All estimated restoration times are updated when new relevant information is obtained, such as the determination of the outage cause, or the repair crews arriving on scene.*

- SDG&E partners with the network of local government agencies responsible for alert and warning in communities and coordinates with Public Safety Partners to maximize outreach efforts.*

- B. The Customer Care Center starts to obtain emergency damage data, including restoration estimates, during the Event Level III and continues through the completion of the emergency. During Event Levels II or I, the Customer Care Center will work closely with Electric Distribution Emergency Operations to coordinate outage data, including estimated restoration times. This ensures data availability well in advance of the GO 166 requirement of within four hours of the initial damage assessment and the establishment of priorities for restoring service.*
- C. As restoration estimates are updated based on repair work in the field, those updates are communicated with the customers primarily on the SDG&E outage website.*
- D. SDG&E leverages different methodologies for creating initial estimated restoration time estimates based on the size, scope and type of event, meteorological forecasts, and any other relevant information obtained from community partners and/or first responder agencies. In storms and PSPS, given these are both weather related, meteorological forecasts are leveraged for the initial estimated restoration time. If there is a fire or earthquake, SDG&E would leverage its partnerships with first responders to know when it was safe to begin assessment in the impacted areas and build ERTs from that information. For PSPS specifically, initial ERTs are created by taking the estimated weather event end time plus 12 hours of daylight patrol and restoration time.*

*To evaluate the accuracy of the estimated restoration times, SDG&E measures the accuracy as the absolute value of (actual restoration time – estimated restoration time) divided by actual restoration time.*

- E. SDG&E's communication strategy leverages the Public Safety Power Shut-off (PSPS) Guidelines where it is feasible and appropriate. For example, in a major outage caused by an earthquake or other no-notice disaster or emergency type, it is not possible to provide advanced notice per the PSPS Guidelines.*

**STANDARD 9**

**TRAIN ADDITIONAL PERSONNEL  
TO ASSIST WITH  
EMERGENCY ACTIVITIES**

Standard 9. Personnel Redeployment Planning Standard

SDG&E's Compliance with Standard 9

*SDG&E's Training and Redeployment Plans for performing safety standby activities and assessing damage during a major outage are as follows:*

*Redeployment Plan: The District Operations and Engineering Manager is responsible for immediately assigning resources to the damage assessment process. Personnel may include, but is not limited to electric troubleshooter, working foremen, linemen, helpers, general foremen, project coordinators, and planners. In a major event, it may become necessary to draw on additional company personnel. Each district not yet involved in the emergency (storm) should be prepared to assist other districts. Requests for additional personnel should go through the Resource Coordination Team Lead so that effective control and allocation of resources is assured. Resource Coordination will contact the Trouble Dispatch department if assistance is needed to recruit personnel. Trouble Dispatch will provide a callout list similar to the district callout lists for this purpose.*

*Training: Assessor and safety standby training is performed on an annual basis with refresher courses delivered if needed. Formal classes are provided to ensure public and worker safety. Exercises for specific areas of the plan are performed during the year as practical training and a formal exercise, using the entire plan is performed yearly. In addition, the O&E Manager in each district is to brief assessors and safety stand-by personnel prior to their deployment. Fielders are to understand that wires down or exposed conductors are to be considered energized unless identified, isolated, tested dead, and grounded. They are to be aware that downed or exposed conductors could become energized without warning in storm conditions.*

*During the 2024 reporting period, SDG&E successfully activated its Personnel Redeployment Planning Standard during Q1 winter storms and in the November and December PSPS events.*

**STANDARD 10**

**COORDINATE EMERGENCY PLANS**

**WITH**

**STATE AND LOCAL PUBLIC SAFETY AGENCIES**



Standard 10. Annual Pre-Event Coordination Standard

SDG&E's Compliance with Standard 10

*During the reporting period, SDG&E hosted agencies for training exercises focused on PSPS. Representatives from SD County OES, CalOES and the CPUC attended the exercises on April 11, 2024, and May 13-16, 2024.*

*Additionally, SDG&E follows all PSPS regulations for pre-event coordination which includes:*

- Meeting with public safety partners several times throughout the year*
- Updating partner contact information*
- Participating in joint training & exercises*
- Briefing local Senior and elected officials*
- Coordination with local tribal partners*
- Coordination with critical infrastructure partners*

*SDG&E also participates in regional planning efforts such as:*

- Critical Lifelines*
- Southern California Catastrophic Earthquake Plan*
- Southern Region Mutual Aid Regional Advisory Council Meetings*
- California Emergency Services Association membership*
- Regional Emergency Managers Working Group*
- Regional AFN Working Group*

**STANDARD 11**

**FILE AN ANNUAL REPORT  
DESCRIBING COMPLIANCE  
WITH THESE STANDARDS**

Standard 11. Annual Report

SDG&E's Compliance with Standard 11

*This document includes SDG&E's annual report for the 12-month period ending December 31, 2024 and describes SDG&E's compliance with the GO 166 standards. In addition, SDG&E's repair and maintenance personnel are listed below (by county) for 2023 and 2024.*

2023 REPAIR AND MAINTENANCE PERSONNEL  
BY CLASSIFICATION IN EACH COUNTY

Personnel Classification	San Diego County	Orange County
Electric Supervisor (General & Administrative)	34	3
Working Foreman	30	4
Fault Finding Specialist	5	1
Lineman	153	17
Apprentice Lineman	50	4
Line Checker	1	0
Troubleshooter	40	3
Line Assistant	32	0
Total	345	32

2024 REPAIR AND MAINTENANCE PERSONNEL  
BY CLASSIFICATION IN EACH COUNTY

Personnel Classification	San Diego County	Orange County
Electric Supervisor (General & Administrative)	42	4
Working Foreman	36	3
Fault Finding Specialist	5	1
Lineman	169	14
Apprentice Lineman	45	5
Line Checker	1	0
Troubleshooter	38	3
Line Assistant	27	3
Total	363	33

**STANDARD 12**

**RESTORATION PERFORMANCE BENCHMARK  
FOR A MEASURED EVENT**

Standard 12. Restoration Performance Benchmark for a Measured Event

SDG&E's Compliance with Standard 12

*SDG&E did not have any Measured Events during the twelve-month time period ending December 31, 2024, that caused SDG&E to implement Standard 12. SDG&E's benchmarks are set forth below.*

*A. Benchmark*

*The CPUC will review SDG&E's restoration performance following a Measured Event<sup>1</sup> based on the Customer Average Interruption Duration Index (CAIDI).*

*B. CAIDI*

*A CAIDI of 570 or below is presumed reasonable. A CAIDI above 570 is presumed unreasonable; however, the presumptions are rebuttable. Each sustained interruption experienced by a single customer shall count as a separate customer interruption. CAIDI will be measured from the beginning of the Measured Event until all customers experiencing interruptions during the Measured Event have been restored.*

*C. Transmission Outages*

*Customer minutes of interruption caused by outages on the transmission system are included in the calculation of CAIDI. Transmission outage minutes attributable to compliance with ISO directives that preclude SDG&E from restoring service are excluded from the CAIDI calculation.*

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<sup>1</sup> Measured Event: A Measured Event is a Major Outage (as defined herein), resulting from non-earthquake, weather- related causes, affecting between 10% (simultaneous) and 40% (cumulative) of a utility's electric customer base. A Measured Event is deemed to begin at 12:00 a.m. on the day when more than one percent (simultaneous) of the utility's electric customers experience sustained interruptions. A Measured Event is deemed to end when fewer than one percent (simultaneous) of the utility's customers experience sustained interruptions in two consecutive 24-hour periods (12:00 a.m. to 11:59 p.m.); and the end of the Measured Event in 11:59 p.m. of that 48-hour period.

**STANDARD 13**

**CUSTOMER CARE CENTER**

**BENCHMARK FOR A MEASURED EVENT**

Standard 13. Customer CARE Center Benchmark for a Measured Event

SDG&E's Compliance with Standard 13

*SDG&E did not have any Measured Events during the twelve-month time period ending December 31, 2024 that caused SDG&E to implement Standard 13. SDG&E's benchmarks are set forth below.*

A. Benchmark:

*The CPUC will perform a review of SDG&E's Customer Care Center performance following a Measured Event based on percent busies.*

B. Percent Busies:

*SDG&E's CARE-Center performance will be presumed reasonable if the percent busies calculation is lower than Level-1 and presumed to be unreasonable if the percent busies calculation is greater than Level-2. The presumptions are rebuttable. Performance equal to or between Level-1 and Level-2 is subject to no presumption.*

*Percent busies calculation measures the levels of busy signals encountered by customers at SDG&E's switch and that of its contractors. Percent busies indicator is measured on a 24-hour basis for outage-related calls (on energy outage and general call lines) from the time the Measured Event begins (12:00 a.m. to 11:59 p.m.) and separately for each 24-hour period until the Measured Event ends.*

*Percent busies may be calculated as either:*

- a. Percent of call attempts reaching the Customer Care Center that receive a busy signal.*
- b. Percent of time that trunk line capacity is exhausted.*

*Level-1 and Level-2 are defined as follows:*

- Level-1 is defined as 30% busies over the day of the outage (12:00 a.m. to 11:59 p.m.);*
- Level-2 is defined as 50% busies over the day of the outage plus at least 50% busies in each of six one-hour increments (increments need not be consecutive).*

C. Other Care Center Metrics:

*SDGE tracks metrics which measure the availability of agents, to provide customers with information during an emergency or disaster. These metrics are reviewed and managed with a focus on continuous improvement. Additionally, the company's external website, SDGE.com is hosted on "The Cloud" via Amazon Web Services (AWS). The company has a 99.99999 uptime service level agreement (SLA) which includes auto-scaling of web servers and regions, as well as advanced Disaster Recovery plans to mitigate downtime. The company also upgraded their infrastructure to the Acquia Cloud Next for enhanced performance, self-healing*

*capabilities to ensure high availability and dedicated service isolation for enhanced security.*



**STANDARD 14**

**PLAN DEVELOPMENT COORDINATION  
AND PUBLIC MEETING**

Standard 14. Plan Development Coordination and Public Meeting

SDG&E's Compliance with Standard 14

*SDG&E invites every city, county, state, and tribal partners to an annual meeting to review and provide input to the Company Emergency and Disaster Preparedness Plan (CEADPP).*

- *Orange County: May 28, 2024*
- *San Diego County: May 22, 2024*
- *Tribal Partners: May 29, 2024*
- *AFN Partners: May 30, 2024*

*In addition to the agencies listed above, SDG&E also provides opportunities to provide input at the following regional stakeholder meetings:*

- *Public Safety Partners*
- *San Diego County Unified Disaster Council*
- *Regional AFN Working Group*
- *SDG&E Wildfire Advisory Council*
- *SDG&E Community Advisory Council*
- *Regional Emergency Managers Working Group*
- *Regional Tribal Leaders Group*

*In accordance with the standard, every two years the meetings are publicly noticed. All documentation for the biennial meetings is submitted to the appropriate persons of contact at the commission.*