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July 18, 2019

VIA EMAIL

Ms. Alice Stebbins
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: San Diego Gas & Electric Company's Request for Expedited Issuance of an Initial Safety Certification Pursuant to Public Utilities Code § 8389

Dear Ms. Stebbins,

On behalf of San Diego Gas & Electric Company ("SDG&E"), I request that you expeditiously issue an Initial Safety Certification to SDG&E pursuant to Public Utilities Code § 8389. While Public Utilities Code Section § 8389(f) provides that you "shall issue an initial safety certification within 30 days of receipt of a request for that certification" if the electrical corporation provides the required documentation, SDG&E requests that you provide the Initial Safety Certification as soon as possible. We request expedition because the availability of several important provisions of the recently-enacted Assembly Bill 1054 – which added Section 8389 to the Public Utilities Code – are conditioned upon the electrical corporation's receipt of a valid safety certification. *See, e.g.*, Public Utilities Code §§ 451.1(c); 3292(h)(3)(B).

Section 8389(f)(1) requires an electrical corporation to provide "documentation that it is meeting the requirements set forth in paragraphs (1), (2), (3) and (5) of subdivision (e)." Those requirements are as follows:

- (1) The electrical corporation has an approved wildfire mitigation plan.
- (2) The electrical corporation is in good standing, which can be satisfied by the electrical corporation having agreed to implement the findings of its most recent safety culture assessment, if applicable.
- (3) The electrical corporation has established a safety committee of its board of directors composed of members with relevant safety experience.
- (5) The electrical corporation has established board-of-director-level reporting to the commission on safety issues.

Through this letter, SDG&E documents that it is meeting those requirements as follows:

- (1) Decision 19-05-039 approved SDG&E's Wildfire Mitigation Plan, which is publicly available at:
<https://www.sdge.com/rates-and-regulations/proceedings/wildfire-mitigation-plan-oir>.
- (2) Safety culture assessments are a requirement of Public Utilities Code § 8386.2, which was added to the code by Senate Bill 901, effective January 1, 2019. Section 8386.2 provides:

The commission shall require a safety culture assessment of each electrical corporation to be conducted by an independent third-party evaluator. The commission shall set the schedule for each assessment, including updates to the assessment at least every five years. The electrical corporation shall not seek reimbursement for the costs of the assessment from ratepayers.

The Commission has not yet initiated a safety culture assessment for SDG&E. Accordingly, the requirement to provide documentation of SDG&E's agreement to implement safety culture assessment findings is inapplicable. In any event, SDG&E believes it is in good standing.

- (3) SDG&E has established a safety committee of its Board of Directors composed of members with relevant safety experience. The committee members are Robert J. Borthwick, Erbin B. Keith, and Trevor I. Mihalik. SDG&E will also establish a Community Wildfire Safety Advisory Council comprised of independent community members who possess extensive public safety and wildfire experience. This council will advise the safety committee of SDG&E's Board of Directors. SDG&E believes this council exceeds the requirements of § 8389(f).
- (5) SDG&E has established board-of-director-level reporting to the Commission on safety issues. SDG&E identifies Kevin C. Sagara, Chairman of the Board of Directors, as its liaison from its Board of Directors to the Commission, and we look forward to establishing periodic communications with the Commission.

SDG&E has posted this letter to its public website at <https://www.sdge.com/rates-and-regulations>.

SDG&E meets the requirements of § 8389(f). Accordingly, SDG&E respectfully requests that you expeditiously issue it an Initial Safety Certification. Please contact me if you have any questions about this request.

Respectfully submitted,



Attachment

cc: Elizaveta Malashenko, CPUC Deputy Director for Safety and Enforcement

ATTACHMENT 1

AFFIDAVIT

AFFIDAVIT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA

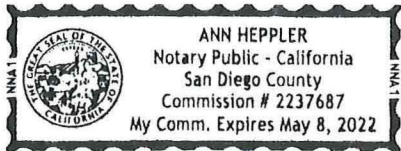
COUNTY OF SAN DIEGO

My name is Dan Skopec. I am an officer of San Diego Gas & Electric Company (“SDG&E”) and am authorized to make this affidavit on behalf of SDG&E. The matters stated in the foregoing letter are true and correct to my own knowledge, except as to matters that are stated therein on information and belief, and as to those matters, I believe them to be true.

I certify under penalty of perjury of the laws of the State of California that the foregoing is true and correct.

Executed this 18th day of July 2019 at San Diego, California.


Dan Skopec
Vice President, Regulatory Affairs
SAN DIEGO GAS & ELECTRIC COMPANY



 7/18/19