



**Dan Skopec**  
Vice President, Regulatory Affairs

8330 Century Park Court, CP33A  
San Diego, CA 92123-1530  
Tel: 858-650-4189  
DSkopec@sdge.com

March 27, 2020

**VIA EMAIL**

President Marybel Batjer  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: San Diego Gas & Electric Company's COVID-19 Policies

Dear President Batjer,

At the March 26, 2020 Commission meeting, Nate Fairman, Business Manager of IBEW Local 465, sent a letter requesting that the Commission stay “non-essential, non-emergency work.” I am writing to clarify the types of work SDG&E is continuing to perform (and why that work is essential to the public health and safety), as well as work that is being deferred and temporarily halted, and to address the additional safety measures SDG&E has implemented to further protect employees during the COVID-19 pandemic.

On March 19, 2020, Governor Newsom issued Executive Order N-33-20 ordering all individuals living in California to stay at home “except as needed to maintain continuity of operations of the federal critical infrastructure sectors.” The federal Cybersecurity and Infrastructure Security Agency (CISA) (within the U.S. Department of Homeland Security) has included the energy infrastructure sector (*e.g.*, electric and gas utilities) in its list of such critical infrastructure sectors. Governor Newsom referenced and adopted CISA’s list of critical infrastructure sectors in the Executive Order, noting that such sectors’ “assets, systems, and networks, whether physical or virtual, are considered so vital to the United States that their incapacitation or destruction would have a debilitating effect on security, economic security, public health or safety, or any combination thereof.” As a result, Governor Newsom ordered “that Californians working in these 16 critical infrastructure sectors may continue their work because of the importance of these sectors to Californian’s health and well-being.”

On March 22, 2020, Governor Newsom published a list of Essential Critical Infrastructure workers to help state, local, tribal, and industry partners ensure continuity of functions critical to public health and safety as well as economic and national security. The list of essential electricity and natural gas industry workforce personnel includes, among others, the following: “Workers who maintain, ensure, or restore the generation, transmission, and distribution of electric power, including call centers, utility workers, reliability engineers and fleet maintenance technicians;” “Vegetation management crews and traffic workers who support;” “Environmental remediation/monitoring technicians;” “Instrumentation, protection,

and control technicians;” “Instrumentation, protection, and control technicians;” “Natural gas transmission and distribution pipelines, including compressor stations;” and “Natural gas security operations centers, natural gas operations dispatch and control rooms/centers natural gas emergency response and customer emergencies, including natural gas leak calls.”

Consistent with Governor Newsom’s Executive Orders and CISA’s guidance – and in accordance with the best judgment of SDG&E’s leadership, including SDG&E’s goal to provide clean, safe, and reliable energy to our customers and our values of ensuring employee and public safety – SDG&E has taken a variety of steps to ensure it fulfills its responsibilities as an essential critical infrastructure provider to California. In that regard, SDG&E has determined that the following work is within its role as an essential critical infrastructure provider and must be continued in furtherance of public health and safety:

- SDG&E’s Corrective Maintenance Program is a public safety program that includes the inspection and maintenance of the electric distribution and transmission system. This program addresses issues such as transformers with wire entry, loose guy wires, and insufficient clearances – all of which are critical to public safety.
- SDG&E’s Customer Service Field employees are ensuring customers can comply with the Governor’s stay-at-home order by responding to orders to light pilot lights and ensure furnaces, stoves and water heaters are operating. This work is particularly important since residents have been ordered to stay home and they need basic services.
- SDG&E’s wildfire mitigation and prevention work is essential to ensure wildfire safety for this fire season, and significant portions of our infrastructure hardening work must be completed sequentially. SDG&E must complete this work in advance of the fall, when fire danger is typically greatest.
- SDG&E’s Vegetation Management Program is a key component of wildfire safety, public safety, and electric reliability.
- Gas locate and mark work is an essential public safety function. SDG&E must continue to patrol and survey for leaks.
- SDG&E is continuing to respond to electric outages and gas leaks to ensure safety.
- SDG&E’s gas system is controlled by a central control center via SCADA telemetry. Maintenance of this system is essential to continuing to provide gas service.
- The CPUC has mandated prescribed maintenance intervals for critical gas equipment. SDG&E is working to maintain compliance with the CPUC requirements and to ensure reliability.
- Infrastructure construction is continuing to occur in the service territory by numerous entities. When this activity is occurring close to a high priority gas facility, SDG&E must monitor that activity on site to ensure the gas system is not damaged.
- Connecting new customers is essential to providing electric and gas supply to other essential services such as hospitals, grocery stores, first responder agencies, as well as to houses.

- Continued operation of customer contact centers is necessary to ensure service is maintained. SDG&E has deployed a “work-at-home” model to allow some service agents to take calls and serve customers from home using remote technology to maintain even greater social distancing. SDG&E branch offices have been closed, however, those employees have been re-assigned to other customer service roles.

To mitigate the risk of COVID-19 exposure, SDG&E has also suspended certain field work and activities, including:

- Non-critical planned electric outages.
- Non-safety related customer requested orders such as appliance adjustments and checkups.
- Electric reliability improvement projects that impact customers. These include pro-active cable replacements, connector replacements, switch replacements, aging infrastructure replacement and adding sectionalizing equipment.
- Electric distribution capacity upgrades that impact customers. These include new distribution circuits and installing larger conductors for capacity.
- Electric maintenance and compliance projects where there is not an identified safety risk and impact to customers.
- Training of employees.

Further, SDG&E is evaluating, on a case-by-case basis, the following field work to ensure customer impacts are minimal:

- Overhead to underground conversions.
- Customer requested upgrade projects.
- New business.

In addition to deferring work that can be deferred, SDG&E has also implemented additional safety measures to keep employees safe while they are performing critical infrastructure work that is essential to public health and safety. Specifically:

- Before performing field work, SDG&E customer service field personnel are pre-screening customers to assess potential COVID-19-related exposure by asking customers and other residents if they have COVID-19, have any symptoms associated with COVID-19, or have been exposed to anyone with COVID-19.
- If a customer or resident answers the pre-screening questions affirmatively, SDG&E is delaying non-safety-related work until the risk of exposure ceases and following enhanced personal protective equipment and social distancing protocols for safety-related and other essential work orders.
- Additional crew reporting locations have been established to reduce the number of employees that report to their individual work locations.
- All daily safety briefings are now being done by each supervisor in groups of less than ten employees.

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- Grid Control split their operations and half of the operators are working from the backup control center.
- Plans are being developed to sequester Grid Control transmission operators in place, if necessary.
- SDG&E is requiring employees to practice social distancing of six feet whenever possible and instructing sick employees to stay home.
- If an employee tests positive for COVID-19, or has symptoms and confirmed exposure, SDG&E has protocols in place to ensure immediate identification of and notification to other employees who have been in close contact with the affected employee to ensure those employees also self-quarantine.
- SDG&E has developed additional protocols to thoroughly deep clean and sanitize the workspaces of the affected employee and those who may have come into close contact with them.
- SDG&E continues to provide guidance to its workforce on proper hygiene and respiratory etiquette.

SDG&E takes the health and safety of its customers and its workforce very seriously. As the COVID-19 pandemic evolves, SDG&E will continue to reevaluate its policies and the types of work it performs to ensure they remain appropriate under the circumstances. SDG&E will also continue to engage with its Union workforce on these and other issues.

Please contact me if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Dan Skoper". The signature is written in a cursive, flowing style.