



September 16, 2026

Dear Stakeholders,

Enclosed is the Office of Energy Infrastructure Safety's (Energy Safety's) Annual Performance Report regarding San Diego Gas & Electric Company's execution of its 2024 Wildfire Mitigation Plan.

This Annual Performance Report is published as of the date of this letter. San Diego Gas & Electric Company may, if it wishes to do so, file a public response to this Annual Performance Report within 14 calendar days of the date of publication. Comments must be submitted to Energy Safety's E-Filing system in the 2024 Annual Performance Report docket.<sup>1</sup>

Sincerely,

/s/ Patrick Doherty

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Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety

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<sup>1</sup> Submit responses to the [2024-APR](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024-APR) docket via the Office of Energy Infrastructure Safety's E-Filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024-APR>



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

# 2024 ANNUAL PERFORMANCE REPORT

**SAN DIEGO GAS & ELECTRIC COMPANY**

September 2026

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## Executive Summary

Energy Safety's primary objective is to ensure that electrical corporations reduce wildfire risk and adhere to their approved Wildfire Mitigation Plans (WMPs), which are annually filed pursuant to Public Utilities Code section 8385 *et seq.* Energy Safety's annual performance evaluation of San Diego Gas & Electric Company (SDG&E) is a comprehensive look at the implementation of its 2024 WMP and its catastrophic wildfire risk reduction initiatives.

SDG&E completed 33 (56%) of 59 2024 WMP initiatives. One of the missed initiatives of note was Distribution Drone Assessments; where 6,529 out of the targeted 13,500 assessments (48%) were conducted, but SDG&E exceeded its budget, spending \$106.3 million, which is \$10.8 million more than the budgeted \$95.5 million (or 111% of the budgeted total).

SDG&E has a year-over-year trend of missing targets for certain initiatives. For initiatives related to strategic undergrounding, transmission overhead hardening, advanced protection, communication reliability improvements, strategic pole replacement, and standby power, targets were missed more than once during the 2020-2023 period in addition to being missed in 2024.

By missing targets for several of its 2024 WMP initiatives, SDG&E failed to reduce risk on its system in the manner committed to its customers and the people of California through its WMP.

The electrical corporation's Annual Report on Compliance (EC ARC) is the mechanism by which an electrical corporation should describe the reasons for its failure to meet its WMP targets or objectives in a given year. This retrospective analysis allows both the electrical corporation and Energy Safety to consider the impact of real-world events on targets set years in the past, and whether a reasonable basis exists for excusing the failure to meet a given target. This approach depends on the transparency and reliability of an electrical corporation's representations in its EC ARC.

SDG&E's 2024 EC ARC set out several rationales for missing its initiative targets, including denied change order requests, permitting issues, and a pending settlement in SDG&E's General Rate Case (GRC), among others. SDG&E's EC ARC did not, however, provide any insight into its process for allocating resources among the various 2024 WMP initiative activities to ensure that some targets were met while others were not. It is not apparent, for example, that SDG&E prioritized initiatives that reduced the greatest amount of risk on its system when determining which initiative targets to focus on in 2024. SDG&E also failed to meet even the reduced targets that SDG&E itself proposed in a change order. Instead, SDG&E unilaterally made changes to its wildfire mitigation strategy that did not reduce risk as much as if it had followed through on its 2024 WMP commitments.

Energy Safety also identified several other observations and areas for improvement:

- SDG&E's ignitions in High Fire Threat District Tier 2 areas increased by 13 events from 2023 to 2024, driven primarily by contact from objects and equipment failure.
- SDG&E's Public Safety Power Shutoff (PSPS) events increased in 2024 with four events compared to prior years with zero recorded events, notwithstanding that SDG&E may have had good reason to call its 2024 PSPS events. This impacted nearly 15,000 customers and more than 500 elements of critical infrastructure, for events as long as one million customer hours (a 100% increase from the previous historic high of around 500,000 million customer hours in 2020).
- Energy Safety issued 19 Notices of Violation for 2024 WMP work and identified 14 instances of inconsistent initiative activity reporting. This level of data accuracy and completion is inadequate and is an area in which SDG&E must continue to improve.
- SDG&E's expenditure in the aggregate was consistently below proposed budgets in 2024. When combined with the large number of missed initiative targets, this suggests that SDG&E could have met more of its 2024 WMP initiative targets while staying within originally planned budgets. This calls into question SDG&E's assertions in its EC ARC that fiscal constraints drove it to reduce work on several of its WMP initiatives in 2024.

Going forward, SDG&E must show, through consistent action, that it will honor its WMP commitments and thus meaningfully reduce wildfire risk in the manner committed to its customers and the people of California through its WMP. Energy Safety will scrutinize SDG&E's future WMP performance and continue to report on any failures by SDG&E to achieve its own objectives to reduce the risk of catastrophic wildfire in California.

## 1. Introduction

Energy Safety's primary objective is to ensure that electrical corporations reduce wildfire risk and adhere to their approved Wildfire Mitigation Plans (WMPs).<sup>1</sup> This Annual Performance Report (APR) presents the Office of Energy Infrastructure Safety's (Energy Safety's) statutorily mandated assessment of San Diego Gas & Electric Company's (SDG&E's) performance relative to its 2024 targets for initiatives and objectives in its 2023-2025 Base Wildfire Mitigation Plan (2023-2025 Base WMP) and approved change order requests.<sup>2</sup> While the 2023-2025 Base WMP considers activities over a three- and 10-year horizon, this report only addresses targets established for initiatives and objectives to be completed in 2024. Therefore, this report uses the term "2024 WMP" to refer to portions of the 2023-2025 Base WMP and partially approved change order requests addressed by this report.

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<sup>1</sup> Government Code Section 15475.1(a).

<sup>2</sup> On December 19, 2023, SDG&E submitted a change order request for nine initiatives. On May 31, 2024, Energy Safety approved one of the changes and denied the remaining eight.

In the sections that follow, Energy Safety describes the statutory basis for this report, the 2024 WMP, the information supplied by SDG&E, the independent evaluation conducted by a third-party independent evaluator that examined SDG&E's implementation of its 2024 WMP, and an assessment of how SDG&E implemented its 2024 WMP. Finally, Energy Safety provides its conclusions and recommendations for further actions by SDG&E.

## 2. Performance Assessment Process

The statutory objective of electrical corporation wildfire mitigation planning efforts is to ensure that electrical corporations are constructing, maintaining, and operating their infrastructure in a manner that will minimize the risk of catastrophic wildfire.<sup>3</sup>

Government Code section 15475(b)(2) directs Energy Safety to develop performance metrics to achieve maximum feasible risk reduction to be used to develop the wildfire mitigation plan and evaluate an electrical corporation's performance relative to the implementation of that plan.

In this report, Energy Safety considers the totality of all performance assessments completed with respect to SDG&E's 2024 WMP. This includes all inspection, audit, investigation, and data analysis work performed by Energy Safety, as well as separate electrical corporation and independent third-party evaluations of implementation.

The following is an overview of the performance areas assessed by Energy Safety:

1. Energy Safety assessed *2024 WMP attainment performance* by determining whether the electrical corporation met the 2024 WMP targets for initiatives and objectives, looking specifically at whether the electrical corporation funded and performed the work stated for each initiative, and by performing field inspections of WMP work claimed to be completed by SDG&E;
2. Energy Safety assessed *ignition risk performance* by tracking ignition rates, wire down rates, and unplanned outage rates, all indicators of ignition risk;
3. Energy Safety assessed *Public Safety Power Shutoff (PSPS) performance* by tracking the frequency, scope, duration, and impact of PSPS events;
4. Energy Safety assessed *outcome metrics performance* by tracking the number of acres burned, number of buildings damaged or destroyed, number of fatalities or injuries, and total value of assets lost due to wildfires ignited by SDG&E's equipment; and

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<sup>3</sup> Pub. Util. Code section 8386(a).

5. Energy Safety assessed *data accuracy and completeness performance* by crosschecking data from various utility reporting mechanisms, assessing the accuracy of data submitted by SDG&E during field auditing of SDG&E's WMP work, reviewing multiple reports, reviewing a formal quality assurance and quality control evaluation, and identifying issues encountered during the performance assessment process.

### 3. SDG&E 2024 Wildfire Mitigation Plan

SDG&E originally submitted a Base WMP on March 27, 2023, covering a three-year term from 2023 through the end of 2025,<sup>4,5</sup> as well as a change order request on December 19, 2023.<sup>6</sup>

Energy Safety approved SDG&E's 2023-2025 Base WMP on October 13, 2023.<sup>7</sup> On May 31, 2024, Energy Safety approved only one of eight requested changes in SDG&E's December 19, 2023, change order request.<sup>8,9</sup> SDG&E also submitted a Petition to Amend its 2023-2025 WMP to Energy Safety on April 10, 2025, for its 2024 and 2025 WMP initiatives. On July 11, 2025, Energy Safety denied all five requests applicable to 2024 because SDG&E did not demonstrate good cause and the 2024 performance period had concluded four months prior to the petition filing.<sup>10</sup> For the purpose of this report, Energy Safety refers to the 2023-2025 Base WMP, any approved change order requests, as well as the 2024 targets and initiatives, collectively as the 2024 WMP.

SDG&E's 2024 WMP highlighted past and ongoing efforts to address wildfire risk and reduce the impacts of PSPS events.<sup>11</sup> The 2024 WMP described 59 initiative activities, which are divided up into six categories and with some highlights identified here:<sup>12</sup>

1. Grid Design, Operations, and Maintenance: SDG&E planned to continue its Covered Conductor Program (WMP.455); implementing new Advanced Radio Frequency Sensors

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<sup>4</sup> According to the 2023-2025 WMP Technical Guidelines.

<sup>5</sup> 2023-2025 Base WMP Decision.

<sup>6</sup> 2024 Change Order Decision.

<sup>7</sup> 2023-2025 Base WMP Decision.

<sup>8</sup> 2024 Change Order Decision.

<sup>9</sup> WMP Process & Evaluation Guidelines, page 22. A change order request allows an EC to request approval for a change or update to mitigation initiatives from its approved WMP prior to submission of a subsequent WMP or Update based on an updated understanding of risk.

<sup>10</sup> WMP Guidelines, page 172. An Energy Safety Petition to Amend allows the EC to submit a petition to amend its approved WMP to align the WMP with a California Public Utilities Commission decision in a general rate case (GRC) proceeding.

<sup>11</sup> 2024 WMP, pages 17-18.

<sup>12</sup> 2024 WMP, pages 17-18.

- (ARFS) technologies; enhancing existing infrared inspections of overhead distribution inspection technologies (WMP.481); and conducting drone assessments (WMP.552).
2. Vegetation Management and Inspections: SDG&E planned enhancements to various programs such as tracking and maintaining its tree and pole database (WMP.511), trimming and removals and enhanced vegetation management (WMP.501), pole brushing (WMP.512), and auditing (WMP.505).
  3. Situational Awareness and Forecasting: SDG&E planned to continue its partnership with academia to further develop fire science through integration of initiatives, such as the Santa Ana Wind Threat Index (SAWTI) (WMP.540) and Fire Potential Index (FPI) (WMP.450).
  4. Emergency Preparedness: SDG&E planned to increase staff allocation in its Emergency Management Operations. The increase in additional staff would be to modify workforce training, streamline processes and documentation management, improve collaboration by developing a software solution allowing third-party access and creating dashboards that incorporate Human Factors Engineering (HFE) into PSPS decision-making tools (WMP.1335).
  5. Community Outreach and Engagement: SDG&E planned to identify gaps in their community outreach and engagement process by regularly soliciting feedback from partners and the communities it serves (WMP.1337). SDG&E also planned to continue refinement of their year-round safety education and communication campaigns, in addition to enhancing mobile application and communication platforms, and leveraging school communication platforms. SDG&E further expanded public education via their Access and Functional Needs (AFN) efforts and by focusing on groups with Limited English Proficiency (LEP) and Tribal communities (WMP.1336).
  6. PSPS Outreach and Engagement: SDG&E planned to expand its education and communication efforts about wildfire safety to PSPS targeted customers (WMP.563). SDG&E planned to continue increasing granularity and accuracy in their PSPS assessments by improving its protective equipment threshold settings (WMP.1338).

The 2024 WMP also contained three- and ten-year objectives.

Selected three-year objectives include:<sup>13</sup>

- Utilize strategic undergrounding to reduce or eliminate the threat of wildfire, and the use of PSPS during extreme weather (WMP.473).
- Install automation equipment on 21 circuits within the HFTD areas, with emphasis on Tier 3 districts to allow for more comprehensive protection and greater situational awareness (WMP.463).

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<sup>13</sup> 2024 WMP, pages 134-135, 295, 336-337, and 441.

- Continue improving existing weather forecasting models by noting and evaluating discrepancies between predictions and observed reality (WMP.540 and WMP.450).
- Enhance HFE into the design of current and future PSPS decision making tools (WMP.1335).

Selected ten-year objectives include:<sup>14</sup>

- Utilize technology such as Asset360 and asset health indices to develop data-driven strategies for risk-informed maintenance and repair efforts (WMP.1332).
- Replace legacy transmission asset management system with industry standard technology (Section 8.1.5.2).
- Install switches in strategic locations improving the ability to isolate high risk areas for potential de-energization (WMP.461).
- Explore and evaluate operationalization of smoke plume modeling technology (WMP.970).
- Develop training environments to better simulate all hazards and allow for more realistic exercises and training (WMP.526).
- Enhance customer communication and ability to reach vulnerable populations during emergencies (WMP.527).
- Continue to explore areas of high risk for additional grid hardening and customer backup resiliency initiatives to mitigate PSPS impacts to customers (Section 8.1.2).

Of particular importance are the following objectives which have targets or goals for 2024, and are therefore assessed by this report:<sup>15</sup>

- Replace hotline clamps connected directly to overhead primary conductors to eliminate wire-down events (WMP.464),
- Complete Tier 3 overhead hardening efforts, while continuing Tier 2 hardening. (Section 8.1.2.5.2),
- Continue hardening the backbone network and expand to new sites when and where broader fire community benefits can be realized (WMP.1343),
- Incorporate and publish air quality index (AQI) data in existing Fire Science and Climate Adaptation (FSCA) application (WMP.970),
- Modernize and enhance workforce training in the areas of storm response, process, and documentation (WMP.526),
- Continued engagement with Human Engineering to develop a dashboard and workflow for wildfire and PSPS notifications (WMP.1335), and

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<sup>14</sup> 2024 WMP, pages, 142, 296, and 334.

<sup>15</sup> 2024 WMP, pages 133-136, 291-292, 334-335.

- Enhance collaboration and engagement with public safety partners and the community utilizing the Wildfire & Climate Resiliency Center (WMP.527).

Descriptions of the activities and objectives of the programs and initiatives contained in SDG&E's 2024 WMP and the approved change order request are listed in the table in Appendix A.

## 4. SDG&E Annual Report on Compliance

Public Utilities Code section 8386.3(b)(1) directs electrical corporations to file a self-evaluation report addressing the electrical corporation's implementation of its approved plan during the prior calendar year. This document is known as the Electrical Corporation Annual Report on Compliance (EC ARC).

Energy Safety's Compliance Guidelines outlined the requirements for an EC ARC prepared to address the 2024 calendar year and filed by the electrical corporation in early 2025. The EC ARC was required to detail the electrical corporation's self-assessment of its performance with the 2024 WMP during 2024.<sup>16</sup>

SDG&E submitted its EC ARC to Energy Safety on April 1, 2025. In summary, the EC ARC reported that SDG&E, "substantially completed or exceeded the target for 30 of 41 quantitative programs in 2024, achieving the overall risk reduction intent as described in the 2023-2025 Base WMP."<sup>17</sup> SDG&E noted accomplishments relating to fire hardening overhead lines, undergrounding lines, completing inspections and corrective actions within required timeframes, and vegetation management inspections and work to exceed minimum quantitative clearance requirements.<sup>18</sup> The EC ARC also reported that SDG&E's WMP implementation was impacted by its 2024 General Rate Case (GRC) application.<sup>19</sup>

The EC ARC is considered by Energy Safety as well as by the independent evaluator in its assessment of SDG&E's WMP performance or evaluation of WMP implementation, respectively. For a summary of the EC ARC information on initiative completion and actual spending, see the table in Appendix A.

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<sup>16</sup> 2024 Compliance Guidelines.

<sup>17</sup> EC ARC, page 1. Energy Safety's total initiative activity count (59) for this APR includes quantitative and qualitative activities, while the 41 activities considered by the EC ARC only accounted for quantitative targets.

<sup>18</sup> EC ARC, pages 1-2.

<sup>19</sup> EC ARC, page 2.

## 5. Independent Evaluator ARC for SDG&E

Energy Safety, in consultation with the Office of the State Fire Marshal, annually publishes a list of entities qualified to serve as independent evaluators of WMP compliance.<sup>20</sup> Each electrical corporation is then required to hire an independent evaluator (IE) from the list of approved evaluators to perform an annual independent WMP compliance evaluation.<sup>21</sup>

The IE reviews and evaluates the electrical corporation's compliance with its approved WMP. As part of its evaluation, the IE must investigate instances of large deviation in actual expenditure greater than 10% as compared to the proposed expenditure amount in the associated WMP.

The 2024 Independent Evaluator Annual Report on Compliance (IE ARC) for SDG&E was prepared by Bureau Veritas North America, Inc. The IE ARC included a review of the wildfire mitigation initiatives and activities implemented in 2024, and an accounting of whether SDG&E met its performance targets, deviated from its budget, and followed its quality assurance and quality control (QA/QC) processes.

The IE utilized a variety of techniques to analyze SDG&E's progress toward meeting its 2024 WMP commitments, such as inspecting a sample of SDG&E's field-verifiable 2024 WMP initiatives, performing desk reviews of non-field verifiable initiatives, interviewing selected utility staff, and reviewing the 2024 WMP and 2024 EC ARC.<sup>22</sup> The IE evaluated a total of 43 initiatives.<sup>23, 24</sup> The IE ARC includes sample verification statistics, an opinion on initiative completions, and actual expenditures for each initiative.<sup>25</sup>

The IE ARC identified 27 of 41 initiatives as complete (66%). Of the 14 initiatives identified as incomplete in the IE ARC, SDG&E had also identified 11 as incomplete in SDG&E's EC ARC. The three reported incomplete by the IE, but not by SDG&E, were: Strategic Undergrounding

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<sup>20</sup> Pub. Util. Code Section 8386.3(b)(2)(A).

<sup>21</sup> Pub. Util. Code Section 8386.3(b)(2)(B)(i).

<sup>22</sup> IE ARC, pages 7-8.

<sup>23</sup> IE ARC, pages 9-12.

<sup>24</sup> The IE's total for 43 initiative activities includes five initiatives that did not have targets in the 2024 WMP (SCADA Capacitors (WMP.453), Distribution Overhead System Hardening (WMP.575), Expulsion Fuse Replacement (WMP.459), Distribution Wood Pole Intrusive Inspections (WMP.483), Transmission Wood Pole Intrusive Inspections (WMP.1190), and QA/QC – Wood Pole Intrusive (WMP.1193)), and did not include several qualitative initiative activities. Because these initiative activities did not have 2024 targets, they were not included in the 59 initiative activities evaluated by Energy Safety in this report.

<sup>25</sup> IE ARC, pages 16-24.

(WMP.473), Lightning Arrestors (WMP.550), and Transmission Overhead Hardening (WMP .543).<sup>26</sup> The IE ARC findings are summarized by initiative in Appendix A.

Finally, the IE reviewed SDG&E's QA/QC processes, assigning scores from 0 to 4 for five QA/QC Maturity Model metrics (Figure 1). For a full description of the QA/QC Maturity Model, see the IE ARC Outline and the IE ARC.<sup>27, 28</sup>

In the IE ARC, the IE did not make a general conclusion regarding SDG&E's overall QA/QC process for WMP initiative completion, but highlighted the following:<sup>29</sup>

- Roles and Responsibilities: The IE reported that SDG&E demonstrated clearly defined and thoroughly implemented roles across various aspects of the QA/QC process.<sup>30</sup>
- Quality Culture: The IE reported that SDG&E demonstrated a strong commitment to QA/QC.<sup>31</sup>
- Quality Management System (QMS): The IE reported that SDG&E utilized various databases that allow for easy tracking and record finding, allowing SDG&E to make risk-based decision making.<sup>32</sup>
- Quality Inspections and Audits: The IE reported that SDG&E conducted regular internal and external inspections and audits for different asset types.<sup>33</sup>
- QA/QC Technology Adoption: The IE reported that SDG&E utilized various databases to compile QA/QC; and that SDG&E implemented two new platforms to the CityWorks program to track the progression of internal audits.<sup>34</sup>

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<sup>26</sup> IE ARC, pages 21-24, 89, and 101.

<sup>27</sup> IE ARC Outline, page 14.

<sup>28</sup> IE ARC, pages 114-118.

<sup>29</sup> IE ARC, pages 114-117.

<sup>30</sup> IE ARC, page 114.

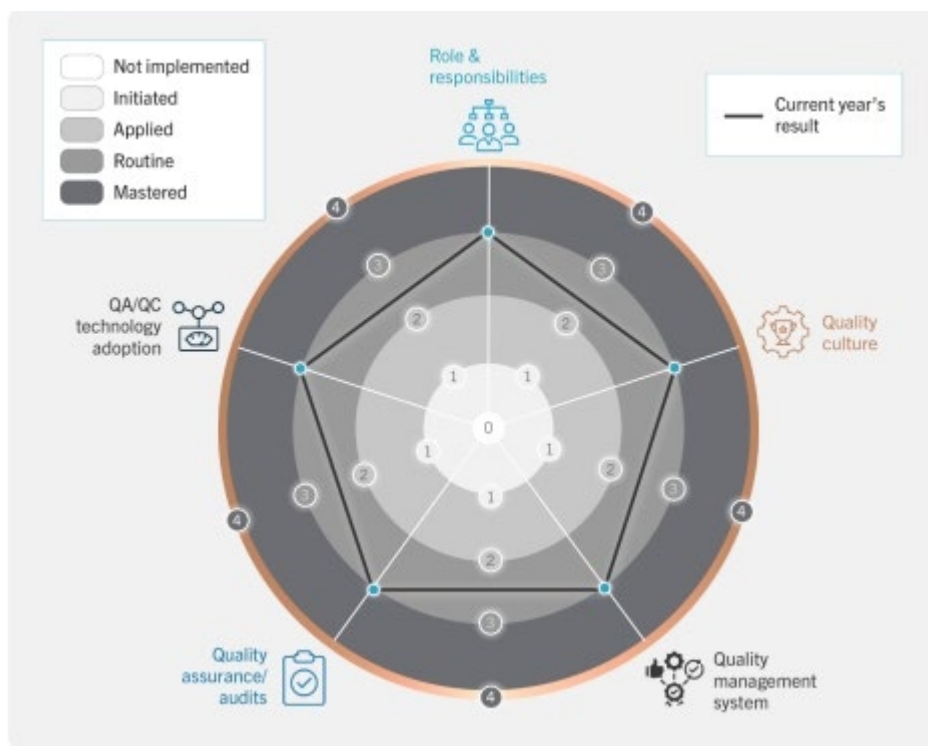
<sup>31</sup> IE ARC, page 115.

<sup>32</sup> IE ARC, page 115.

<sup>33</sup> IE ARC, page 116.

<sup>34</sup> IE ARC, page 117.

Figure 1. Radar Plot of QA/QC Maturity Model for SDG&E from IE ARC<sup>35</sup>



## 6. WMP Initiative Attainment Performance

Energy Safety's assessment of SDG&E's performance in 2024 indicates that SDG&E attained 33 (56%) of its 59 targets for its 2024 WMP initiative activities. The subsections below further describe Energy Safety's assessment of SDG&E's execution of its 2024 WMP.

Section 6.1 provides an overview of the 2024 WMP initiatives assessed for attainment by Energy Safety. Section 6.2 describes the vegetation management assessments performed by Energy Safety. Section 6.3 provides an overview of Energy Safety's field inspection of both grid hardening and vegetation management activities related to SDG&E's 2024 WMP work, including inaccuracies in SDG&E's data regarding completed WMP work. Section 6.4 summarizes the initiatives with missed targets, if any, and provides three perspectives on the impact of SDG&E's failure to meet some of its 2024 WMP targets: percentage of completion, budget impacts, and risk reduction impacts. Section 6.5 provides an overview of the 2024 WMP proposed expenditures and compares them to the actual expenditures. Finally, Section 6.6 summarizes the findings and conclusions of Section 6. Altogether, Section 6 characterizes

<sup>35</sup> IE ARC, page 118.

SDG&E's performance with respect to its 2024 WMP initiative attainment. Additional performance assessments appear in Sections 7 through 10.

## 6.1 SDG&E 2024 WMP Initiative Activities Assessed by Energy Safety

Energy Safety assessed WMP attainment performance on 59 wildfire mitigation initiative activities from the 2024 WMP.<sup>36</sup> The initiatives are grouped into six main categories:

1. Grid Design, Operation, and Maintenance with 28 initiatives assessed and an associated proposed expenditure of approximately \$485.1 million.
2. Vegetation Management and Inspections with 16 initiative activities assessed and a proposed expenditure of approximately \$85.5 million. (Section 6.2).
3. Situational Awareness and Forecasting with three initiatives assessed with no proposed expenditure.
4. Emergency Preparedness with six initiatives assessed and a proposed expenditure of approximately \$22.1 million.
5. Community Outreach and Engagement with one initiative assessed with no proposed expenditure.
6. PSPS Outreach and Engagement with five initiatives assessed and a proposed expenditure of approximately \$6.5 million.

A complete list of initiatives along with expenditure information appears in the table in Appendix A.

The initiative performance assessment process included comparing the actual initiative completion as reported to Energy Safety by SDG&E in its quarterly data report (QDR) and in its EC ARC, and as reported by the IE in the IE ARC.<sup>37</sup> The information from each of these sources is summarized along with the final assessment of performance for each initiative in the table in Appendix A. In some cases, Energy Safety issued data requests to answer specific questions. If data request information is used in the assessment, a citation for the particular instance is provided. Statistics and findings from Energy Safety field audits of 2024 WMP work are also considered. Finally, the Energy Safety Vegetation Management Audit (VMA) Report also contributed to Energy Safety's APR assessment.<sup>38</sup>

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<sup>36</sup> 2024 WMP, pages 131-404.

<sup>37</sup> 2024 Q4 QDR; EC ARC Appendix A, pages 1-5; and IE ARC, pages 21-24.

<sup>38</sup> VMA Report.

## 6.2 Energy Safety Vegetation Management Audit Report

Each performance year Energy Safety completes an audit of the vegetation management work performed by an electrical corporation as described in its approved WMP (the Vegetation Management Audit (VMA)).<sup>39</sup> In the VMA, Energy Safety assesses completeness of each qualitative commitment and quantitative target associated with each initiative from the electrical corporation's approved WMP. The VMA issues findings on the initiative level, as defined in Appendix A of the 2023-2025 Wildfire Mitigation Plan Technical Guidelines.<sup>40</sup>

The VMA is sent to the electrical corporation, which then has the opportunity to provide Energy Safety with a corrective action plan (CAP) to address any deficiency identified in the VMA. Energy Safety analyzes the CAP and issues a VMA Report that documents any outstanding deficiencies and describes the electrical corporation's overall program performance for that year.

For performance year 2024, Energy Safety issued its VMA to SDG&E on October 2, 2025,<sup>41</sup> received the CAP on October 30, 2025<sup>42</sup> and issued the 2024 VMA Report on February 26, 2026.<sup>43</sup>

This APR reproduces the VMA Report conclusions but rather than referencing each vegetation management initiative number it references the Utility Initiative Tracking ID to allow for consistency throughout the APR. Appendix B provides a crosswalk between the 13 Vegetation Management initiative numbers included in the VMA Report to the 16 Utility Initiative Tracking IDs included in this APR.

Energy Safety's VMA Report concluded that SDG&E made year-over-year improvements in its vegetation management programs and successfully achieved the objectives of ten of the 13 vegetation management initiatives in its 2024 WMP. Energy Safety identified outstanding deficiencies in three initiatives within SDG&E's vegetation management program: 8.2.3.2 Wood and Slash Management, 8.2.3.5 Substation Defensible Space, and 8.2.6 Open Work Orders. Energy Safety found that SDG&E did not meet its target to remove fuels around 500 poles (WMP .497) and did not demonstrate that it removed all wood and slash from vegetation management mitigation sites in 2024. SDG&E did not complete all substation inspections on the risk-informed frequencies described in its WMP (WMP.492). Finally, SDG&E did not complete all its routine and priority work orders within the risk-based timeframes

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<sup>39</sup> Pub. Util. Code section 8386.3(b)(5)(A)

<sup>40</sup> WMP Technical Guidelines, pages A-24 to A-26.

<sup>41</sup> VMA Report, Appendix 1.

<sup>42</sup> VMA Report, Appendix 2.

<sup>43</sup> VMA Report.

specified in its WMP (WMP.1329). SDG&E has acknowledged these deficiencies and has planned for or initiated implementation of corrective actions to address them.<sup>44</sup>

The specific findings from Energy Safety's VMA Report are summarized in Appendix B.

## 6.3 Energy Safety Field Inspection Assessment

Energy Safety performs field audits of the WMP work reported as complete by the electrical corporations. Energy Safety's field audits provide empirical verification of the WMP work conducted by the EC. These field audits also act as an audit of the EC's data quality and provide insight regarding the EC's ability to collect and accurately report on work that it has done in the field to implement a WMP.

When performing a field audit, Energy Safety conducts two types of inspections: 1) inspections of grid hardening, vegetation management, and other work related to WMP initiatives, and 2) inspections of general wildfire safety (GWS) conditions at an inspection site. Inspections of general wildfire safety conditions are not strictly related to WMP initiatives.<sup>45</sup>

### Observation

As detailed below, Energy Safety's field inspections determined that SDG&E's initiative completeness data had inconsistencies in some 2024 WMP initiatives, which represent broader data management issues that SDG&E must address going forward.

### 6.3.1 Inspection and Notice of Violation Counts

For field audits of 2024 WMP work, inspections that found instances of non-performance of WMP initiative work resulted in a notice of violation (NOV). An overview of the location counts of inspections and NOVs by initiative name appears in Table 1.

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<sup>44</sup> VMA Report, page 24.

<sup>45</sup> If Energy Safety observes a general wildfire safety concern during an inspection activity, then that is recorded as a "Wildfire Safety Concern." Or as it was known prior to 2024, a "defect." If Energy Safety observes non-performance of a WMP initiative during an inspection activity that an electrical corporation claimed to have occurred at a site, then that is recorded as a "deficiency" and may be the subject of a "Notice of Non-Performance" sent to the electrical corporation. Prior to 2025, this notice was known as a "Notice of Violation."

Table 1. Energy Safety Inspection Counts and Notices of Violation, by Initiative<sup>46</sup>

| 2024 WMP Initiative                                  | Number of Inspections | Notices of Violation (NOVs)               |
|------------------------------------------------------|-----------------------|-------------------------------------------|
| Covered Conductor Installation<br>8.1.2.1<br>WMP.455 | 112                   | 2<br>(2 Completeness)                     |
| Avian Protection<br>8.1.2.10.2<br>WMP.972            | 121                   | 7<br>(3 Data Accuracy,<br>4 Completeness) |
| Lightning Arrestors<br>8.1.4.6<br>WMP.550            | 151                   | 6<br>(6 Completeness)                     |
| Pole Clearing<br>8.2.3.1<br>WMP.512                  | 415                   | 4 <sup>47</sup><br>(4 Completeness)       |

### 6.3.2 Data Accuracy and Completeness Issues Observed by Field Audits

As described above, Energy Safety issued 19 NOVs to SDG&E upon inspection of its 2024 WMP work. Of those 19 NOVs, three were related to data accuracy issues and 16 were related to completeness issues observed in the course of field audits.

Data accuracy issues can vary, but generally there are instances in which either: 1) an electrical corporation reported WMP work completed when work did not occur, or 2) work was completed at a location, but the nature of the work was different than the EC reported.

<sup>46</sup> 2024 NOV Docket (these NOVs may be found by accessing Energy Safety's e-filing docket for 2024 NOVs).

<sup>47</sup> Five NOVs for pole clearing were issued to SDG&E for 2024 WMP work, but one of these was later withdrawn by Energy Safety.

Completeness issues are instances where the WMP work claimed to have been completed at a location was done in an incomplete manner and therefore should not have been counted by the electrical corporation as “complete” WMP work.

The existence of data accuracy or completeness issues in the spatial QDR submissions of an electrical corporation calls into question the reliability of the electrical corporation’s claimed completion of WMP work. For example, if an electrical corporation claims to have completed 100 units of a type of WMP work, but Energy Safety inspectors discover data accuracy and completeness issues with specific instances of the work reported, then the claim that 100 units were completed is unreliable.

In the case of SDG&E’s 2024 WMP work, Energy Safety’s field audits observed data accuracy or completeness issues with work claimed as completed under the following WMP initiatives: Covered Conductor Installation (WMP.455), Lightning Arrestors (WMP.550), Avian Protection (WMP.972), and Pole Clearing (WMP.512).

The table below (Table 2) describes the numbers of points or miles inspected by Energy Safety for the 2024 WMP work reported by SDG&E as completed for each of the relevant WMP initiatives, and the number of points or miles with data accuracy or completeness issues. A percentage of the 2024 WMP work reported by SDG&E as complete with those issues is also described.

Table 2. Energy Safety Inspection Counts and Data Accuracy and Completeness Issues, with Percentage of Inspections Where Issues were Observed

| Initiatives with Data Accuracy and Completeness Issues | Number of Points or Miles Inspected | Total Points or Miles with Issues | Percentage of Points or Miles with Issues |
|--------------------------------------------------------|-------------------------------------|-----------------------------------|-------------------------------------------|
| Covered Conductor Installation<br>8.1.2.1<br>WMP.455   | 112                                 | 2                                 | 1.8%                                      |
| Avian Protection<br>8.1.2.10.2<br>WMP.972              | 121                                 | 7                                 | 5.8%                                      |

| Initiatives with Data Accuracy and Completeness Issues | Number of Points or Miles Inspected | Total Points or Miles with Issues | Percentage of Points or Miles with Issues |
|--------------------------------------------------------|-------------------------------------|-----------------------------------|-------------------------------------------|
| Lightning Arrestors<br>8.1.4.6<br>WMP.550              | 151                                 | 6                                 | 4.0%                                      |
| Pole Clearing<br>8.2.3.1<br>WMP.512                    | 415                                 | 4                                 | 1.0%                                      |

The electrical corporation must demonstrate that it met its WMP targets. Because Energy Safety's field audit of SDG&E's 2024 WMP work observed issues with the data reported by SDG&E on some of its 2024 WMP work, the actual amount of 2024 WMP work reported as completed by SDG&E with respect to the above initiatives is somewhat unreliable as shown in Table 3, below. However, this unreliability did not ultimately affect Energy Safety's determination that SDG&E met, or did not meet, the targets for these initiatives.

*Table 3. Energy Safety Summary of Data Accuracy and Completeness Issues*

| Initiatives with Data Accuracy and Completeness Issues | 2024 WMP Target | Actual Points or Miles Completed as Reported by SDG&E | Percentage of Points or Miles with Issues | Reliable Actual Points or Miles |
|--------------------------------------------------------|-----------------|-------------------------------------------------------|-------------------------------------------|---------------------------------|
| Covered Conductor Installation<br>8.1.2.1<br>WMP.455   | 60 miles        | 35.9 miles                                            | 1.8%                                      | 35.3 miles                      |
| Avian Protection<br>8.1.2.10.2<br>WMP.972              | 200 poles       | 702 points                                            | 5.8%                                      | 661 points                      |

| Initiatives with Data Accuracy and Completeness Issues | 2024 WMP Target | Actual Points or Miles Completed as Reported by SDG&E | Percentage of Points or Miles with Issues | Reliable Actual Points or Miles |
|--------------------------------------------------------|-----------------|-------------------------------------------------------|-------------------------------------------|---------------------------------|
| Lightning Arrestors<br>8.1.4.6<br>WMP.550              | 1,848 arresters | 1,547 points                                          | 4%                                        | 1,485 points                    |
| Pole Clearing<br>8.2.3.1<br>WMP.512                    | 33,010 poles    | 36,500 points                                         | 1%                                        | 36,135 points                   |

## 6.4 SDG&E WMP Objective and Initiative Activity Attainment in 2024

An EC's WMP is assessed on the basis of whether it is feasible, cost efficient, demonstrates continued improvement and forward-looking progress, and reduces wildfire risk.<sup>48</sup> An EC's ability to complete its initiative activities demonstrates its competence and commitment to executing on that plan. Therefore, the findings regarding initiative attainment are at the heart of any WMP evaluation, in that they measure the EC's performance in implementing the wildfire risk reduction activities that the EC itself committed to do for the benefit of its customers and the broader California public.

Energy Safety assessed 59 wildfire mitigation initiatives for 2024 WMP attainment performance and found that SDG&E missed 26 initiative activity targets (44%). A complete list of the initiative activities where SDG&E missed its targets is shown in Table 4, below.

Some of the initiative targets that SDG&E missed were also missed in prior years. SDG&E missed initiative targets related to undergrounding, transmission overhead hardening, advanced protection, strategic pole replacement, standby power, and communication improvements several times during the 2020-2023 period before missing them again in 2024. The recurring missed targets for these initiatives suggest a systemic issue with SDG&E's implementation of its WMP work generally that it must address. Energy Safety will continue

<sup>48</sup> 2023-2025 Process and Evaluation Guidelines, page 9.

to monitor SDG&E’s performance and push SDG&E to consistently meet its targets in these areas.

Section 6.4.2 elaborates on the financial impact of initiatives with missed targets on proposed expenditures, and Section 6.4.3 on the impacts of initiatives with missed targets on risk reduction, to measure the gap between SDG&E’s WMP and its implementation.

Observation

While SDG&E met targets for a majority of its 2024 WMP initiatives, it missed targets for a significant share (44%), as detailed below. Some of the targets that SDG&E missed were related to grid hardening activities and are part of a multi-year trend of missing several different WMP initiatives.

Table 4. SDG&E WMP Initiatives with Missed Targets

| Not Attained SDG&E<br>2024 WMP Initiative | 2024 WMP Initiative<br>Activity Target | Actual Performance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------------------------------------|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Covered Conductor<br>8.1.2.1<br>WMP.455   | Target: 60 miles                       | Actual: 35.2 miles<br><br>SDG&E claimed that many barriers hindered the completion of the covered conductor initiative such as its rejected change order request, its inability to change its 2024 workplan, land right acquisition delays, finalizing engineering and design, permitting, material availability, and weather. <sup>49</sup><br><br>SDG&E’s actual performance failed to meet its own proposed reduced target of 40 miles as proposed in its rejected change order request. <sup>50</sup> SDG&E’s proposed GRC settlement with Public Advocates did not impact the budget for covered conductor work. |

<sup>49</sup> EC ARC, pages 34-35; Section 6.3, Table 3 of this APR.

<sup>50</sup> 2023 SDG&E Change Order, page 5.

| Not Attained SDG&E<br>2024 WMP Initiative               | 2024 WMP Initiative<br>Activity Target | Actual Performance                                                                                                                                                                                                                                                                                                                        |
|---------------------------------------------------------|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Strategic Underground<br>8.1.2.2<br>WMP.473             | Target: 125 miles                      | Actual: 112 miles<br><br>SDG&E reported its ability to acquire land rights, discretionary permitting, and weather conditions as factors that hindered its ability to achieve the target. <sup>51</sup>                                                                                                                                    |
| Transmission Overhead Hardening<br>8.1.2.5.2<br>WMP.543 | Target: 10.2 miles                     | Actual: 9.08 miles<br><br>SDG&E reported that, among other things, extreme weather conditions delayed construction. <sup>52</sup>                                                                                                                                                                                                         |
| Microgrids<br>8.1.2.7<br>WMP.462                        | Target: Four microgrids                | Actual: Zero microgrids<br><br>In its 2023 change order requests, SDG&E proposed to reduce the program to one microgrid due to delays in land right acquisitions and increased material and labor cost. <sup>53</sup><br><br>SDG&E reported in its 2024 EC ARC that the initiative was paused due to the 2024 GRC decision. <sup>54</sup> |
| Advanced Protection<br>8.1.2.8.1<br>WMP.463             | Target: Eight circuits                 | Actual: Five circuits<br><br>SDG&E reported relocating the advanced protection crews in November and December of 2024 to perform undergrounding and covered conductor work instead. <sup>55</sup>                                                                                                                                         |

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<sup>51</sup> EC ARC, page 35.

<sup>52</sup> EC ARC, page 36.

<sup>53</sup> 2023 SDG&E Change Order, page 8.

<sup>54</sup> EC ARC, page 36.

<sup>55</sup> EC ARC, pages 36-37.

| Not Attained SDG&E<br>2024 WMP Initiative                                                                                                                   | 2024 WMP Initiative<br>Activity Target | Actual Performance                                                                                                                                                                                                                                                                                                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Long Term Evolution<br>(LTE) Communication<br>Network [Distribution<br>Communications<br>Reliability Improvement<br>(DCRI)]<br><br>8.1.2.8.3<br><br>WMP.549 | Target: 60 stations                    | Actual: Three stations<br><br>SDG&E reported that the initiative was not completed due to budget reductions made in anticipation of the 2024 GRC decision. <sup>56</sup>                                                                                                                                                    |
| Strategic Pole<br>Replacement<br><br>8.1.2.10.2<br><br>WMP.1189                                                                                             | Target: 267 poles                      | Actual: 40 poles<br><br>SDG&E reported that evaluating and selecting a new design firm impacted the completion of the Strategic Pole Replacements initiative. <sup>57</sup><br><br>SDG&E had asked Energy Safety to increase the original target of 200 poles to 267 poles, and this request was approved by Energy Safety. |
| Standby Power Programs<br><br>8.1.2.11.2<br><br>WMP.468                                                                                                     | Target: 300 generators                 | Actual: 54 generators<br><br>SDG&E claimed funding challenges related to its 2024 GRC decision. <sup>58</sup><br><br>SDG&E's actual performance failed to meet its own reduced target of 58 generators as proposed in its change order request. <sup>59</sup>                                                               |

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<sup>56</sup> EC ARC, page 37.

<sup>57</sup> EC ARC, page 39.

<sup>58</sup> EC ARC, pages 40-41.

<sup>59</sup> 2023 SDG&E Change Order, page 5.

| Not Attained SDG&E<br>2024 WMP Initiative               | 2024 WMP Initiative<br>Activity Target | Actual Performance                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------------------------|----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Distribution Infrared Inspections<br>8.1.3.3<br>WMP.481 | Target: 9,532 inspections              | Actual: 6,398 inspections<br><br>SDG&E reported adopting a risk-informed approach to optimize inspections considering uncertainties with the 2024 GRC decision and the proposed Settlement Agreement. <sup>60, 61</sup><br><br>SDG&E's proposed GRC settlement with Public Advocates did not impact the budget for work on distribution infrared inspections. |
| Distribution Drone Assessments<br>8.1.3.7<br>WMP.552    | Target: 13,500 inspections             | Actual: 6,529 inspections<br><br>SDG&E cited the historical number and severity of findings from 2023, the pending 2024 GRC decision, and the proposed GRC Settlement Agreement as drivers of the missed target. <sup>62</sup><br><br>SDG&E's proposed GRC settlement did not impact the budget for work on distribution drone assessments.                   |
| Lightning Arrestors<br>8.1.4.6<br>WMP.550               | Target: 1,848 lightning arrestors      | Actual: 1,485 points <sup>63</sup><br><br>Energy Safety calculated the reliable actual total for this initiative based on field inspection findings (see Section 6.3, Table 3). SDG&E's EC ARC granted that only 90% of the target was reached. <sup>64</sup>                                                                                                 |

<sup>60</sup> EC ARC, page 42.

<sup>61</sup> Settlement Agreement.

<sup>62</sup> EC ARC, page 43.

<sup>63</sup> Section 6.3, Table 3 of this APR.

<sup>64</sup> EC ARC, page 38.

| Not Attained SDG&E<br>2024 WMP Initiative                                 | 2024 WMP Initiative<br>Activity Target                                                                                           | Actual Performance                                                                                                                                                                                                                                                                                            |
|---------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| QA/QC of Distribution<br>Drone Assessments<br><br>8.1.6.3<br><br>WMP.1192 | Target: 13,500<br>structures                                                                                                     | Actual: 6,529 structures<br><br>As this initiative target is tied to the target for Distribution Drone Assessments (8.1.3.7), SDG&E's rationale that the pending 2024 GRC decision and the proposed GRC Settlement Agreement drove the failure to meet the 8.1.3.7 target applies to this initiative as well. |
| Fuels Management<br><br>8.2.3<br><br>WMP.497                              | Target: 500 poles                                                                                                                | Actual: 147 poles<br><br>SDG&E elected to reduce the target with knowledge that the remaining poles would be addressed in other risk reducing vegetation management measures such as pole clearing. <sup>65</sup>                                                                                             |
| Substation Defensible<br>Space<br><br>8.2.3.5                             | 384 substation<br>inspections.                                                                                                   | SDG&E did not complete all work. <sup>66</sup>                                                                                                                                                                                                                                                                |
| Open Work Orders<br><br>8.2.6                                             | Manage the electrical corporation's open work orders resulting from inspections that prescribe vegetation management activities. | Actual: 83% of routine work in 120 days, and 61% of priority work in 30 days<br><br>SDG&E did not meet its commitment to complete both routine and priority work within targeted time frames. <sup>67</sup>                                                                                                   |

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<sup>65</sup> EC ARC, pages 48-49.

<sup>66</sup> VMA Report, page 4.

<sup>67</sup> VMA Report, page 4.

| Not Attained SDG&E<br>2024 WMP Initiative                         | 2024 WMP Initiative<br>Activity Target                                                                        | Actual Performance                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| AQI Sensor – Installation<br>8.3.2.1.3<br>WMP.970                 | Target: Six sensors                                                                                           | Actual: Zero sensors<br><br>SDG&E reported in its EC ARC that in 2024, 0% of the projected targets for Air Quality Index were completed because all installations were completed in 2023. <sup>68</sup> However, SDG&E's 2024 WMP recorded that six sensors were to be installed in 2023, and six were to be installed in 2024. <sup>69</sup> Energy Safety's 2023 ARC for SDG&E reported that only five AQI sensors were installed in 2023, not 12 sensors as implied by SDG&E in its EC ARC. |
| Air Quality Management Program<br>8.3.2.3<br>WMP.970              | Incorporate and publish AQI data via existing FSCA app                                                        | Actual: Not reported                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Wireless Fault Indicators (WFIs)<br>8.3.3<br>WMP.449              | Target: 300 WFIs                                                                                              | Actual: Zero WFIs<br><br>SDG&E reported the initiative was paused due to a manufacturer upgrade that caused issues with current WFIs. <sup>70</sup>                                                                                                                                                                                                                                                                                                                                            |
| Emergency Response Wildfire/PSPS Exercise and Training<br>WMP.526 | To ensure readiness, Wildfire/ and PSPS response teams will participate and recertify by September 1 annually | Actual: Not reported.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

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<sup>68</sup> EC ARC, page 53.

<sup>69</sup> 2024 WMP, page 297.

<sup>70</sup> EC ARC, page 39.

| Not Attained SDG&E<br>2024 WMP Initiative                                                                                                                   | 2024 WMP Initiative<br>Activity Target                                                                      | Actual Performance                                                                                                                                                                        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Company Emergency and Disaster Preparedness Plan (CEADPP) updated per changes in procedures, conditions, law, or Commission policy<br>8.4.2.1.1<br>WMP.1008 | Submit CEADPP updates by December 30, 2024.                                                                 | Actual: Not reported.                                                                                                                                                                     |
| Emergency Planning<br>8.4.2.1.1<br>WMP.1335                                                                                                                 | Add one new state-of-the-art Tactical Mobile Command Trailer to the emergency fleet                         | The project had been paused to reevaluate funding and will be revisited in 2026. <sup>71</sup>                                                                                            |
| PSPS Stakeholder Education and Awareness<br>8.5.2.4<br>WMP.1337                                                                                             | Target: One functional exercise                                                                             | The IE ARC stated that “[w]hile educational objectives were achieved, delayed survey activities resulted in a negligible overall impact on planned risk reduction efforts.” <sup>72</sup> |
| FPI<br>8.3.3.3<br>WMP.450                                                                                                                                   | Integrate FPI into Outage Management Systems for future protective equipment threshold setting improvements | Actual: Not reported.                                                                                                                                                                     |
| Number of customers impacted<br>WMP.1352                                                                                                                    | 47,857 customers impacted                                                                                   | Actual: 53,190 customers impacted                                                                                                                                                         |

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<sup>71</sup> EC ARC, page 19.

<sup>72</sup> IE ARC, page 113.

| Not Attained SDG&E<br>2024 WMP Initiative         | 2024 WMP Initiative<br>Activity Target | Actual Performance              |
|---------------------------------------------------|----------------------------------------|---------------------------------|
| Number of circuits<br>deenergized<br><br>WMP.1353 | 55.49 circuits<br>deenergized          | Actual: 72 circuits deenergized |
| Number of PSPS events<br><br>WMP.1354             | 3.53 PSPS events                       | Actual: Four PSPS events        |

In some cases, the missed targets described above appear reasonable. For example, SDG&E's missed target with respect to the Private LTE initiative may have been legitimately impacted by its pending settlement agreement in the GRC proceeding, as the settlement agreement proposed a nearly 76% reduction in Private LTE funding.

In many other cases, however, SDG&E missed targets even though the pending settlement agreement did not change budget for those activities, including SDG&E's drone inspection activity for 2024, as discussed further below.

SDG&E started its drone inspection program in 2019.<sup>73</sup> In its 2020 WMP, SDG&E included a 10-year vision to deploy "enhanced inspection technologies such as Infrared inspections of [overhead] distribution and drone assessments."<sup>74</sup> SDG&E was successful in doing so, including through conducting approximately 30,000 drone inspections on distribution infrastructure in 2022.<sup>75</sup> This number dropped to a little more than 15,300 in 2023,<sup>76</sup> and in 2024 SDG&E only conducted 6,529, which as discussed above was far below the 2024 WMP target for drone inspections. Given SDG&E's stated number of structures in HFTD,<sup>77</sup> this drops the percentage of HFTD structures inspected to approximately 9% actually inspected out of the approximately 18% of structures that were targeted.

SDG&E's drone inspections were successful in identifying Level 2 conditions (i.e., those conditions that require repair within one year in HFTD areas), with a find rate of nearly 22% during the 2023-2025 period—almost ten times that of SDG&E's traditional ground detailed inspections during the same period.<sup>78</sup> Energy Safety identifies this in its Decision on SDG&E's 2025 Petition to Amend, in which Energy Safety denies a similar reduction in the drone

<sup>73</sup>2020 WMP, pages ix, 6.

<sup>74</sup> 2020 WMP, page 16.

<sup>75</sup> 2022 ARC, page 75.

<sup>76</sup> 2023 ARC, page 53.

<sup>77</sup> 77,722 structures (2020 WMP, page 26).

<sup>78</sup> 2026-28 WMP, page 180. The information in Condition Find Rate columns in Table 8-2 cover the years 2023-2025, per the WMP Technical Guidelines.

inspection target for 2025, stating that “SDG&E’s find rate for drone inspections is considerably greater than its find rate for detailed [ground-based] inspections. This proposal would likely result in a significant amount of risk left unidentified.”<sup>79</sup>

The difference between find rates for ground and drone inspections also formed the basis of Energy Safety’s Area for Continued Improvement<sup>80</sup> SDGE-26B-13 (Distribution Detailed Inspection Comparative Analysis).<sup>81</sup> Overall, SDG&E’s drone inspection program is an important mitigation measure for reducing wildfire risk.

SDG&E’s EC ARC states the following with respect to its failure to meet its drone inspection target in 2024:

To find cost efficiencies without increasing wildfire risk and consider affordability measures given the pending GRC and to align with the pending Settlement Agreement, SDG&E reevaluated the program to optimize the number of inspections based on further risk assessment. The historical number and severity of findings from the first year of program implementation (2023), along with historical repair and replacement costs, were evaluated against the expected wildfire risk consequences at each asset location. This resulted in a determination to perform 6,500 inspections, which represented a balanced approach that still maximized risk reduction.<sup>82</sup>

As noted previously in this report, the pending settlement agreement in SDG&E’s GRC proceeding did not change the budget for distribution drone inspections. Therefore, SDG&E’s argument to accept the missed target on that basis is unpersuasive.

Further, SDG&E’s argument that it was able to reduce costs (by reducing drone inspections and therefore missing its drone inspection target) without increasing wildfire risk is also unpersuasive. As noted above, SDG&E’s drone inspection program had a find rate for Priority 2 conditions during 2023-2025 that was ten times greater than the equivalent find rate for ground-based detailed inspection of distribution assets. Generally speaking, with a find rate of 22%, a reduction in drone inspections by 7,000 meant a reduction in 1,540 Priority 2 conditions (which must be repaired within 12 months in the HFTD) that would have otherwise been found if SDG&E had stuck to its original 2024 WMP drone inspection target.

In the end, costs were not reduced even though wildfire risk arguably increased due to the avoidance of finding Priority 2 conditions. Even though SDG&E only conducted 48% of the 2024 WMP targeted inspections, it incurred 113% of the projected costs. This is due to the fact that while SDG&E’s 2024 target was for inspections themselves, SDG&E included the cost of

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<sup>79</sup> Petition to Amend Decision, page 7.

<sup>80</sup> An “area for continued improvement,” or ACI, is Energy Safety’s term for specific wildfire mitigation activities flagged by a WMP decision as needing further improvement before the EC’s next WMP submission.

<sup>81</sup> 2026-28 WMP Decision, pages 44-47, 59-60.

<sup>82</sup> EC ARC, page 43.

conducting repairs arising from the inspections in the cost of the initiative.<sup>83</sup> SDG&E stated that the overage in costs for this initiative in 2024, despite the significant reduction in inspections, was driven by “more corrective work orders generated in response to inspection repairs and an increase in the cost of materials and labor in 2024.”<sup>84</sup> This implies that in an effort to manage costs, SDG&E reduced inspections to reduce the amount of work orders created by inspections. This approach leads to a significant amount of risk being left of their system, as estimated in the previous paragraph.

Reducing inspections to manage the number of repair orders is not an appropriate response to finding more things to repair than anticipated. Energy Safety has consistently accepted the fact that backlogs can exist and can grow with increased finds, so long as the electrical corporation has a reasonable plan in place to reduce that backlog.<sup>85</sup> The choice to reduce drone inspections was inconsistent with the risk reduction goals in SDG&E’s WMP. SDG&E should consider whether tying the cost of repairs to its inspection initiatives creates inappropriate incentives in this and other areas, such as overemphasizing less-effective inspections (such as ground-based detailed inspections, which in 2024 remained at an inspection period of five years) while curtailing effective ones (such as drone inspections, which in 2024 were reduced to an inspection period of more than double ground detailed inspections).

Drone inspection reduction was not the only unsupported choice SDG&E in 2024. For example, SDG&E identifies that it missed its Advanced Protection targets in part due to crews being reallocated in November and December to undergrounding and covered conductor work.<sup>86</sup> While SDG&E was behind in its covered conductor target, it is not clear why crews would be reallocated to undergrounding work in November, as undergrounding work was highly contested during the GRC proceeding in 2024.

### Observation

In general, the EC ARC does not provide sufficient justification for the trade-offs considered by SDG&E in determining which initiatives to scale down and by how much.<sup>87</sup> And in some cases,

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<sup>83</sup> EC ARC, pages 43-44.

<sup>84</sup> EC ARC, page 44.

<sup>85</sup> See, for example, SCE 2023-2025 WMP Decision, October 24, 2023, pages 49-50, 89 (<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55857&docket=2023-2025-WMPs&shareable=true>); PG&E’s 2023 WMP Decision, December 29, 2023, pages 55-58 (<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56134&docket=2023-2025-WMPs&shareable=true>).

<sup>86</sup> EC ARC, pages 36-37.

<sup>87</sup> Or even if such scope reduction was truly necessary, as Energy Safety’s analysis of the settlement agreement shows that for most initiatives the impact claimed by SDG&E was not apparent.

the EC ARC did not provide a reasonable plan to ensure that SDG&E would meet targets in future years for initiatives for which it missed targets in 2024.<sup>88</sup>

### 6.4.1 SDG&E Change Order Request and Petition to Amend

Because of the importance SDG&E places on the impact of its GRC proceeding and the Petition to Amend on its 2024 WMP work, this subsection provides an overview of the timeline of regulatory filings related to SDG&E's proposed 2024 wildfire mitigation work and its proposed changes to that work over time. It also provides a more detailed analysis of the 10 WMP initiatives that SDG&E stated were impacted in 2024 by the GRC and Petition to Amend process.

On May 15, 2021, SDG&E filed its Risk Assessment and Mitigation Phase (RAMP) application with the California Public Utilities Commission (CPUC). This was the first regulatory filing by SDG&E that began to forecast its planned 2024 wildfire mitigation work and was filed with the CPUC one year in advance of its GRC application. The GRC application was ultimately filed with the CPUC on May 16, 2022.

On March 27, 2023, SDG&E filed its 2023-2025 WMP (which included targets for 2024 WMP work) with Energy Safety. Since this filing was subsequent to SDG&E's GRC application, SDG&E would have been aware at the time of its WMP filing of the protests filed in response to the GRC application by other parties, including the Utility Reform Network (TURN).

On October 13, 2023, Energy Safety issued its decision approving SDG&E's 2023-2025 WMP (including 2024 WMP targets). Eleven days later, on October 24, 2023, SDG&E and CalAdvocates jointly filed a settlement motion with the CPUC in SDG&E's GRC proceeding. The CPUC did not adopt the settlement at that time; the filing date is the date it was presented to the CPUC for its consideration.

On December 19, 2023, SDG&E submitted a change order request that sought to update eight initiative targets for 2024.<sup>89</sup> On May 31, 2024, Energy Safety rejected the change order request

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<sup>88</sup> For example, the EC ARC's description of the missed initiative targets for Transmission Overhead Hardening (WMP.543), Advanced Protection (WMP.463), and Lightning Arrestor Removal and Replacement (WMP.550) did not include a description of steps SDG&E planned to take to ensure that future targets for these initiatives would be met. See EC ARC, pages 36-38.

<sup>89</sup> 2023 SDG&E Change Order. The eight initiatives requested to be updated were Covered Conductor (WMP.455), Strategic Pole Replacement (WMP.1189), Distribution Infrared Inspections (WMP.481), Wireless Fault Indicators (WMP.449), Distribution Communications Reliability Improvements (WMP.549), Air Quality Index (WMP.970), Standby Power Program (Fixed Backup Power) (WMP.468), Microgrids (WMP.462).

with respect to seven of the initiatives, but approved one revision to the Strategic Pole Replacement initiative (WMP.1189), increasing the target from 200 to 267 poles.<sup>90</sup>

On December 19, 2024, the CPUC issued its decision in SDG&E's GRC proceeding concerning the authorized funding for SDG&E's 2024 WMP work.<sup>91</sup> This decision adopted some of TURN's proposals regarding undergrounding and covered conductor work instead of SDG&E's proposals, and also rejected the proposed settlement agreement that SDG&E used in its EC ARC as its explanation for reduced wildfire mitigation work.<sup>92</sup> On January 27, 2025, SDG&E submitted a change order request to revise five of its 2024 WMP targets.<sup>93,94</sup> In this change order request, SDG&E cited the CPUC's rejection of SDG&E's proposed settlement agreement as the cause for requesting to reduce five 2024 WMP initiative targets.<sup>95</sup>

SDG&E filed a Change Order request on January 27, 2025.<sup>96</sup> On February 24, 2025, Energy Safety rejected the change order request and instead provided SDG&E with the opportunity to file a Petition to Amend the 2024 and 2025 years of its WMP to align with the GRC decision, in compliance with Energy Safety's WMP Guidelines.

On April 10, 2025, SDG&E submitted a Petition to Amend seeking to reduce several 2024 and 2025 WMP initiative targets. SDG&E cited the CPUC's GRC decision as the basis for reducing five 2024 WMP initiative targets.<sup>97</sup>

On July 11, 2025, Energy Safety denied all five requests for changes to 2024 targets because SDG&E did not demonstrate good cause and because the 2024 performance period concluded prior to the filing of the Petition to Amend.<sup>98</sup>

Returning to the instant report's analysis of SDG&E's 2024 WMP work, SDG&E asserted in its EC ARC that several of the missed initiative targets were related to its GRC-related settlement

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<sup>90</sup> 2024 Change Order Request Approval, page 3. In general, Energy Safety's criteria for granting change order requests at this time in the 2024 Process and Evaluation Guidelines required the electrical corporation to show that the change to an initiative activity's target would lead to a reduction of risk on an electrical corporation's system compared to the original target, and that the change requested was not simply because implementation was infeasible or because the electrical corporation expected fail to meet its targets.

<sup>91</sup> D.24-12-074, available at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf>. Last accessed: August 13, 2026.

<sup>92</sup> EC ARC, page 2-3.

<sup>93</sup> The three initiative targets previously listed in the SDG&E's 2023 change order request were DCRI (WMP.549), Standby Power Program (WMP.468), and Distribution Infrared Inspection (WMP.481). The two additional initiatives were Drone Assessments (WMP.552) and Fuels Management (WMP.497). Notably, undergrounding was not included in this new change order request despite the failure of the CPUC to approve SDG&E's proposals in that area.

<sup>94</sup> 2023 Change Order Request, page 5.

<sup>95</sup> 2025 Change Order Request, page 2.

<sup>96</sup> 2025 Change Order Decision.

<sup>97</sup> SDG&E Petition to Amend, pages 6-7.

<sup>98</sup> Petition to Amend Decision, pages 3-4.

agreement pending in 2024, the CPUC decision issued in late 2024, the denial by Energy Safety of its 2023 change order request, and Energy Safety's denial of its Petition to Amend filed in 2025. In preparing this APR, Energy Safety reviewed SDG&E's December 2023 change order request (which did not mention the GRC-related settlement even though the change order request was filed after the GRC-related settlement was submitted to the CPUC) and SDG&E's 2025 Petition to Amend (which addresses by reference the impact of SDG&E's GRC litigation).<sup>99</sup> Ten of the unmet initiatives were referenced in one or both filings.

Energy Safety identified inconsistencies in SDG&E's stated reasons for not completing certain initiatives. These inconsistencies complicated Energy Safety's ability to evaluate SDG&E's WMP performance in 2024. To avoid creating these sorts of inefficiencies in the future, SDG&E should employ more consistency in its reporting on its WMP attainment progress. Examples of SDG&E's inconsistent reporting are provided below for three 2024 WMP initiatives:

- Covered Conductor (WMP.455)
  - Change Order Request: SDG&E proposed a target change decrease from 60 miles to 40 miles due to design and engineering delays for 20 miles of work.<sup>100</sup> Energy Safety denied this request.
  - EC ARC: SDG&E claimed that the change order request rejection hindered its ability to add an additional 20 miles to its 2024 workplan,<sup>101</sup> although it was not explained why the denial of a change order request would have this impact.
  - Performance Assessment: SDG&E completed 36 miles (60%) of its 60-mile covered conductor installation target. Even if the change order request had been granted, SDG&E would have completed four fewer miles than the amended target. This demonstrates the lack of reliability in SDG&E's assertions in its change order request that the revised target of 40 miles was achievable and demonstrates the need for future requests to revise WMP targets to set achievable goals.
- LTE Communication Network (DCRI) (WMP.549)
  - Change Order Request: SDG&E proposed a target change decrease from 60 base stations to 15 base stations. SDG&E reasoned that its request was justified due to the use of a new strategy transitioning from high volume deployment to

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<sup>99</sup> 2023 SDG&E Change Order and SDG&E 2025 Petition to Amend. SDG&E's 2025 Petition to Amend claims that the 2023 change order request was driven by the GRC-related settlement even as no mention of the settlement appears in the 2023 change order request (SDG&E 2025 Petition to Amend, page 1 ("[m]any of the target revisions contained in SDG&E's change order request were rooted in program adjustments to reflect SDG&E's then-pending Test Year 2024 [GRC], including SDG&E's Settlement Agreement on Wildfire Issues with Cal Advocates, which provided agreed upon reductions to SDG&E's original GRC forecasts").

<sup>100</sup> 2023 SDG&E Change Order, page 5.

<sup>101</sup> EC ARC, pages 33-34.

more targeted deployment, while assessing the current program and alternative technologies.<sup>102</sup> Energy Safety denied this request.

- EC ARC: SDG&E reported that due to uncertainties with the 2024 GRC, budget restrictions were instituted, which then hindered initiative completion.<sup>103</sup> SDG&E reported having only completed three (5%) of the 60 targeted base stations, while having spent \$22.5 million (71%) of the \$31.7 million total budget for this initiative in 2024.<sup>104</sup>
  - Petition to Amend: SDG&E requested a reduction of the 2024 target to find cost efficiencies given the pending GRC and settlement agreement.<sup>105</sup>
  - Performance Assessment: SDG&E completed three base stations (5%) of the 60 base stations targeted. Even if the change order request had been granted, SDG&E would have completed 12 fewer base stations than its proposed, lower target.
- Standby Power Programs (WMP.468)
    - Change order request: SDG&E proposed a target change decrease from 300 generators to 58 generators. SDG&E reported exploration and evaluation of additional alternative mitigation approaches for its customers. SDG&E further reported that it would use the 2024 calendar year to complete outstanding projects from previous years in addition to exploring alternative offerings.<sup>106</sup> Energy Safety denied this request.
    - EC ARC: SDG&E reported that uncertainties with the 2024 GRC created barriers for completing the initiative target.<sup>107</sup> SDG&E also reported that it used calendar year 2024 to complete outstanding projects from prior years and to evaluate alternative offerings.<sup>108</sup> SDG&E further reported having only supplied 54 (18%) of the 300 total generators targeted, while having spent \$5.2 million (97%) of the \$5.4 million total budget for this initiative in 2024.<sup>109</sup>
    - Petition to Amend: SDG&E requested a reduction to its 2024 target to find cost efficiencies given the pending GRC and settlement agreement.<sup>110</sup>

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<sup>102</sup> 2023 SDG&E Change Order, pages 6.

<sup>103</sup> EC ARC, page 37.

<sup>104</sup> EC ARC, page 37.

<sup>105</sup> SDG&E Petition to Amend, page 6.

<sup>106</sup> 2023 SDG&E Change Order, page 7.

<sup>107</sup> EC ARC, pages 40-41.

<sup>108</sup> EC ARC, page 40.

<sup>109</sup> EC ARC, SDG&E 2024 ARC Summary Targets and Expenditures, page 2.

<sup>110</sup> SDG&E Petition to Amend, page 6.

- Performance Assessment: SDG&E supplied 54 generators (18%) of the 300 generators targeted. Even if the change order request had been granted, SDG&E would have supplied four fewer generators than its proposed, lower target.

Table 5 below summarizes the 10 missed 2024 WMP initiative targets that were related to the change order request and Petition to Amend.

*Table 5. SDG&E WMP Initiatives with Missed Targets Related to Change Order Request and Petition to Amend*

| Not Attained<br>SDG&E 2024 WMP<br>Initiative from<br>Change Order<br>Request <sup>111</sup> | Original<br>Target  | Change<br>Order<br>Request <sup>112</sup> | Energy<br>Safety<br>Decision <sup>113</sup> | Petition to<br>Amend<br>Request <sup>114</sup> | Energy<br>Safety's<br>Petition to<br>Amend<br>Decision <sup>115</sup> | Actual<br>Performance |
|---------------------------------------------------------------------------------------------|---------------------|-------------------------------------------|---------------------------------------------|------------------------------------------------|-----------------------------------------------------------------------|-----------------------|
| Covered<br>Conductor<br><br>8.1.2.1<br><br>WMP.455                                          | 60 miles            | 40 miles                                  | Rejected                                    | N/A                                            | N/A                                                                   | 35.91 miles           |
| Microgrids<br><br>8.1.2.7<br><br>WMP.462                                                    | Three<br>microgrids | One<br>microgrid                          | Rejected                                    | N/A                                            | N/A                                                                   | Zero<br>microgrids    |
| LTE<br>Communication<br>Network (DCRI)<br><br>8.1.2.8.3<br><br>WMP.549                      | 60 stations         | 15 stations                               | Rejected                                    | Five stations                                  | Denied                                                                | Three stations        |

<sup>111</sup> 2023 SDG&E Change Order.

<sup>112</sup> 2023 SDG&E Change Order, page 5.

<sup>113</sup> 2024 Change Order Request Approval, pages 3-7.

<sup>114</sup> SDG&E Petition to Amend, page 2.

<sup>115</sup> Petition to Amend Decision, pages 3-4.

| Not Attained<br>SDG&E 2024 WMP<br>Initiative from<br>Change Order<br>Request <sup>111</sup> | Original<br>Target    | Change<br>Order<br>Request <sup>112</sup> | Energy<br>Safety<br>Decision <sup>113</sup> | Petition to<br>Amend<br>Request <sup>114</sup> | Energy<br>Safety's<br>Petition to<br>Amend<br>Decision <sup>115</sup> | Actual<br>Performance |
|---------------------------------------------------------------------------------------------|-----------------------|-------------------------------------------|---------------------------------------------|------------------------------------------------|-----------------------------------------------------------------------|-----------------------|
| Strategic Pole<br>Replacement<br><br>8.1.2.10.2<br><br>WMP.1189                             | 200 poles             | 267 poles                                 | Approved                                    | N/A                                            | N/A                                                                   | 40 poles              |
| Standby Power<br>Programs<br><br>8.1.2.11.2<br><br>WMP.468                                  | 300<br>generators     | 58<br>generators                          | Rejected                                    | 58 generators                                  | Denied                                                                | 54 generators         |
| Distribution<br>Infrared<br>Inspections<br><br>8.1.3.3<br><br>WMP.481                       | 9,500<br>inspections  | 300<br>inspections                        | Rejected                                    | 300<br>inspections                             | Denied                                                                | 6,398<br>inspections  |
| Distribution Drone<br>Assessments<br><br>8.1.3.7<br><br>WMP.552                             | 13,500<br>inspections | N/A                                       | N/A                                         | 6,500<br>inspections                           | Denied                                                                | 6,529<br>structures   |
| Fuels Management<br><br>8.2.3<br><br>WMP.497                                                | 500 poles             | N/A                                       | N/A                                         | 150 poles                                      | Denied                                                                | 147 poles             |

| Not Attained<br>SDG&E 2024 WMP<br>Initiative from<br>Change Order<br>Request <sup>111</sup> | Original<br>Target | Change<br>Order<br>Request <sup>112</sup> | Energy<br>Safety<br>Decision <sup>113</sup> | Petition to<br>Amend<br>Request <sup>114</sup> | Energy<br>Safety's<br>Petition to<br>Amend<br>Decision <sup>115</sup> | Actual<br>Performance |
|---------------------------------------------------------------------------------------------|--------------------|-------------------------------------------|---------------------------------------------|------------------------------------------------|-----------------------------------------------------------------------|-----------------------|
| AQI Sensor –<br>Installation<br><br>8.3.2.1.3<br><br>WMP.970                                | 18 sensors         | Zero<br>sensors                           | Rejected                                    | N/A                                            | N/A                                                                   | Zero sensors          |
| Wireless Fault<br>Indicators (WFIs)<br><br>8.3.3<br><br>WMP.449                             | 300 WFIs           | Zero WFIs                                 | Rejected                                    | N/A                                            | N/A                                                                   | Zero WFIs             |

As demonstrated above, there is a complicated procedural history with respect to SDG&E's proposals for its 2024 WMP, and the interaction between the CPUC and Energy Safety decisions on the matter. However, it is also apparent from the analysis above that SDG&E's simplifications of the procedural history in its EC ARC do not represent a neutral representation of the reasons it did not meet several of its 2024 WMP targets. In some cases, even the lower targets that SDG&E proposed (and that were rejected by Energy Safety) were not met. This demonstrates the lack of reliability in SDG&E's assertions in its filings before Energy Safety to set revised targets and demonstrates the need for future requests to revise WMP targets to set achievable goals in order to preserve the transparency and reliability of SDG&E's filings before Energy Safety.

### Observation

While SDG&E refers to the failure by Energy Safety to grant a change order request as one reason for several missed targets, it is apparent that SDG&E would have failed to meet its revised targets even if the change order request had been granted. Furthermore, SDG&E did not describe the details of the decision-making that went into these portfolio-level decisions. The lack of transparency and reliability in SDG&E's filings before Energy Safety is concerning as it interferes with the ability for Energy Safety and SDG&E to communicate openly and make informed decisions about the wildfire mitigation work planned by SDG&E.

## Observation

SDG&E's EC ARC did not sufficiently explain the reason for its missed targets, or in some cases provide a reasonable plan for ensuring that the same targets are not missed in future years, as required by Energy Safety's Performance Guidelines.

This APR reiterates that an EC ARC is the mechanism by which an electrical corporation should describe the reasons for its failure to meet its WMP targets or objectives in a given year. This retrospective analysis allows both the electrical corporation and Energy Safety to consider the impact of real-world events on targets set years in the past, and whether a reasonable basis exists for excusing the failure to meet a given target. This mechanism balances the importance of the EC's commitment to its customers and the broader California public to reduce the risk of catastrophic wildfire with the reality that some failures to meet targets could not be reasonably avoided. However, this approach depends on the transparency and reliability of an electrical corporation's representations in its EC ARC.

### 6.4.2 Impact of Initiatives with Missed Targets on Proposed Expenditures

Energy Safety uses the magnitude of funding proposed for a given WMP initiative as one way of gauging the impact of a missed initiative relative to the larger suite of WMP work. This analysis proceeds from the assumption that the greater the proposed expenditure for a WMP initiative, the greater importance that initiative has to the EC's overall plan for wildfire risk reduction. Note that this financial analysis does not attempt to quantify the risk reduction impact of a WMP initiative.

Energy Safety quantified the financial importance of 2024 WMP initiatives for which SDG&E missed targets. For this assessment, Energy Safety created three different perspectives of the financial importance:

1. Relative magnitude of proposed expenditures for initiatives with missed targets to the overall 2024 WMP;
2. Percentage of the proposed expenditures for the initiatives with missed targets that was spent; and
3. Of the 10 largest initiatives by proposed expenditures, the number of initiatives that had missed targets.

The total amount budgeted for the 26 initiative activities with missed targets was \$578.4 million, or 84.1% of the approximate \$687.6 million allocated in SDG&E's 2024 WMP budget. Of the \$582.6 million budgeted for the initiatives with missed targets, \$484.7 million was spent (83.8%).

Energy Safety found that of the 10 largest initiatives by proposed expenditure, six missed their targets and represented a budgeted amount of \$542.9 million, or 85.6%, of the

approximate \$633.6 million allocated for these 10 initiatives in 2024. These six initiatives and their proposed budgets appear below:<sup>116</sup>

- Strategic Undergrounding (WMP.473) - \$301.7 million,
- Distribution Drone Assessments (WMP.552) - \$95.5 million,
- Covered Conductor (WMP.455) - \$79.9 million,
- LTE Communication Network (DCRI) (WMP.549) - \$31.7 million,
- Annual CEADPP Update (WMP.1008) – \$18.3 million, and
- Advanced Protection (WMP.463) - \$15.8 million

### Observation

SDG&E spent less than proposed for expenditures on missed initiatives by a substantial amount (16%). This underscores the significance of EC ARC's failure to give reasonable explanations for the failure to miss certain targets as described above.

See the table in Appendix A for a complete list of initiatives and their proposed and actual expenditures.

## 6.4.3 Impact of Initiatives with Missed Targets on Risk Reduction

For the 2024 WMP, Energy Safety's WMP Technical Guidelines (as published on December 7, 2022) required an electrical corporation to estimate the relative risk impact of its mitigation activities by subtracting the remaining risk after the mitigation activity is completed from the risk that existed before the mitigation activity occurred. The electrical corporation was then to divide the risk difference by the risk before the mitigation activity, and finally, multiply by 100.<sup>117</sup>

When accounting for the amount of risk targeted for removal by an initiative, SDG&E's 26 missed initiatives impacted the planned risk to be removed (*Table 6*). The 2024 WMP does not define the total risk that applies to the stated percentage risk reduction. For example, the 2024 WMP does not state if the planned risk reduction of 7% due to undergrounding of electric lines would lead to a 7% reduction of total system-wide risk, a 7% reduction of total risk at a given circuit or region, or a 7% reduction of some other form of spatial or temporal risk.

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<sup>116</sup> 2024 Q4 QDR, Table 11.

<sup>117</sup> WMP Technical Guidelines, page 71.

Table 6. 2024 WMP Initiatives with Missed Targets – Impact on Risk Removed

| Not Attained SDG&E 2024 WMP Initiative                  | % Risk Impact 2024 WMP <sup>118</sup> | % of WMP Initiative Complete | % Planned Risk Removed |
|---------------------------------------------------------|---------------------------------------|------------------------------|------------------------|
| Covered Conductor<br>8.1.2.1<br>WMP.455                 | 0.81%                                 | 60%                          | 0.49%                  |
| Strategic Underground<br>8.1.2.2<br>WMP.473             | 7%                                    | 90%                          | 6.3%                   |
| Transmission Overhead Hardening<br>8.1.2.5.2<br>WMP.543 | 0.29%                                 | 89%                          | 0.26%                  |
| Microgrids<br>8.1.2.7<br>WMP.462                        | 99%                                   | 0%                           | 100% <sup>119</sup>    |
| Advanced Protection<br>8.1.2.8.1<br>WMP.463             | 0.92%                                 | 63%                          | 0.58%                  |

<sup>118</sup> 2024 WMP, pages 143-146, 258, 297, 338, 388, and 412.<sup>119</sup> Energy Safety found that the EC ARC's explanation that the intended risk reduction was achieved, due to the operation of the microgrids without renewable power, was reasonable (see EC ARC, page 36).

| Not Attained SDG&E 2024 WMP Initiative                                                                         | % Risk Impact 2024 WMP <sup>118</sup> | % of WMP Initiative Complete | % Planned Risk Removed |
|----------------------------------------------------------------------------------------------------------------|---------------------------------------|------------------------------|------------------------|
| LTE Communication Network [Distribution Communications Reliability Improvement (DCRI)]<br>8.1.2.8.3<br>WMP.549 | N/A                                   | 5%                           | N/A                    |
| Strategic Pole Replacement<br>8.1.2.10.2<br>WMP.1189                                                           | 0.18%                                 | 15%                          | 0.03%                  |
| Standby Power Programs<br>8.1.2.11.2<br>WMP.468                                                                | 33%                                   | 18%                          | 6%                     |
| Distribution Infrared Inspections<br>8.1.3.3<br>WMP.481                                                        | 1.6%                                  | 67%                          | 1.1% <sup>120</sup>    |

<sup>120</sup> The EC ARC claimed that the risk reduction intended in 2024 was met due to the “low find rate” of the program (see EC ARC, page 42). However, the quantitative target was set by SDG&E and approved by Energy Safety with the intent to reduce risk in accordance with the target itself, without depending on a given find rate. The EC ARC’s argument is therefore not accepted.

| Not Attained SDG&E 2024 WMP Initiative                         | % Risk Impact 2024 WMP <sup>118</sup> | % of WMP Initiative Complete | % Planned Risk Removed   |
|----------------------------------------------------------------|---------------------------------------|------------------------------|--------------------------|
| Distribution Drone Assessments<br>8.1.3.7<br>WMP.552           | 14%                                   | 49%                          | 6.9% <sup>121, 122</sup> |
| Lightning Arrestors<br>8.1.4.6<br>WMP.550                      | 0.51%                                 | 90%                          | 0.46%                    |
| QA/QC of Distribution Drone Assessments<br>8.1.6.3<br>WMP.1192 | N/A                                   | 48%                          | N/A                      |
| Fuels Management<br>8.2.3<br>WMP.497                           | 0.63%                                 | 29%                          | 0.18%                    |
| Substation Defensible Space<br>8.2.3.5                         | N/A                                   | N/A                          | N/A                      |
| Open Work Orders<br>8.2.6                                      | N/A                                   | N/A                          | N/A                      |

<sup>121</sup> The EC ARC claimed that the risk reduction intended in 2024 was “maximized” in spite of the reduction in inspections by more than half (see EC ARC, page 43). Due to the lack of detail in explaining how the risk reduction intent could be achieved while conducting less than half of the targeted inspections, the EC ARC’s argument is not accepted.

<sup>122</sup> Note also that another way to interpret SDG&E’s performance of this initiative is that, because their find rate was higher than expected, they met their risk reduction goal but underestimated the amount of risk on its system. See discussion later in this section.

| Not Attained SDG&E 2024 WMP Initiative                          | % Risk Impact 2024 WMP <sup>118</sup> | % of WMP Initiative Complete | % Planned Risk Removed |
|-----------------------------------------------------------------|---------------------------------------|------------------------------|------------------------|
| AQI Sensor – Installation<br>8.3.2.1.3<br>WMP.970               | N/A                                   | 0%                           | N/A                    |
| Air Quality Management Program<br>8.3.2.3<br>WMP.970            | N/A                                   | 0%                           | N/A                    |
| Wireless Fault Indicators (WFIs)<br>8.3.3<br>WMP.449            | 0.34%                                 | 0%                           | 100% <sup>123</sup>    |
| Emergency Planning<br>8.4.2.1.1<br>WMP.1335                     | N/A                                   | 0%                           | N/A                    |
| PSPS Stakeholder Education and Awareness<br>8.5.2.4<br>WMP.1337 | N/A                                   | 0%                           | N/A                    |
| FPI<br>8.3.3.3<br>WMP.450                                       | N/A                                   | 0%                           | N/A                    |

<sup>123</sup> Energy Safety found that the EC ARC's explanation that the intended risk reduction was achieved, due to the use of existing manual fault indicators to guide first responders to a fault location, was reasonable (see EC ARC, pages 39-40).

| Not Attained SDG&E 2024 WMP Initiative                                             | % Risk Impact 2024 WMP <sup>118</sup> | % of WMP Initiative Complete | % Planned Risk Removed |
|------------------------------------------------------------------------------------|---------------------------------------|------------------------------|------------------------|
| Emergency Response Wildfire/PSPS Exercise and Training- recertification<br>WMP.526 | N/A                                   | 0%                           | N/A                    |
| Emergency Response Wildfire/PSPS Exercise and Training- updates to plan<br>WMP.526 | N/A                                   | 0%                           | N/A                    |
| Number of customers impacted<br>WMP.1352                                           | N/A                                   | 0%                           | N/A                    |
| Number of circuits deenergized<br>WMP.1353                                         | N/A                                   | 0%                           | N/A                    |
| Number of PSPS events<br>WMP.1354                                                  | N/A                                   | 0%                           | N/A                    |

### Observation

Of SDG&E's 26 incomplete initiative activities, 14 were not assigned a respective risk impact target in the 2024 WMP, and of the 12 remaining activities Energy Safety determined that two of them met their risk reduction goals even though the targets were not met. However, 10 of the 26 incomplete initiative activities were assigned a risk impact that SDG&E did not fulfill due to the initiative activity work being incomplete.

This report concludes that for at least 10 of 59 initiatives, SDG&E failure to meet 2024 targets resulted in less risk reduction than SDG&E committed to its customers and the broader public in its 2024 WMP.

## 6.5 SDG&E 2024 WMP Expenditure Assessment

Energy Safety conducted an expenditure assessment to estimate SDG&E's spending alignment with its 2024 WMP. Unlike the assessment of the impact of initiatives with missed

targets on proposed expenditures, this assessment considers all 2024 WMP initiatives and focuses on the gap between proposed and actual spending, as stated in the WMP. In addition, Energy Safety's assessment identifies spending deviations exceeding 10%, assessing how they impact SDG&E's planned spending variance.

This analysis is intended to provide an assessment of the EC's project management capabilities as they relate to financial management, which in turn provides insight into the EC's ability to responsibly utilize ratepayer funds dedicated to its WMP work.<sup>124</sup>

According to SDG&E's Q1 QDR,<sup>125</sup> it budgeted \$760.6 million for 85 2024 WMP initiatives, representing 32% of SDG&E's total budget for wildfire mitigation for the 2023-2025 period. The EC ARC reported \$667.9 million (87.8%) spent of the \$760.3 million proposed.<sup>126</sup> The IE ARC reported \$580.9 million (86.4%) spent of the \$672.1 million proposed.<sup>127</sup> Energy Safety's assessment was largely consistent with these reports and concluded that \$605.5 million (87%) was spent of the \$692.6 million proposed.

### Observation

Energy Safety analyzed SDG&E's expenditures on individual 2024 WMP initiatives and found that 17 of the 59 2024 WMP initiatives (29%) had actual expenditures that deviated more than 10% from those proposed. For several 2024 WMP initiatives – such as strategic undergrounding, advanced protection, and strategic pole replacement – expenditure was at least 10% less than proposed in the WMP, and the targets for these initiatives were also missed.

See the table in Appendix A for a complete list of initiatives and their proposed and actual expenditures.

## 6.6 Initiative Performance Observations and Conclusions

Section 6 of this report demonstrates that SDG&E missed many of its 2024 WMP initiative activity targets, and that this failure resulted in SDG&E reducing less risk on its system in 2024 compared to what it committed to its customers and the California public in its 2024 WMP. SDG&E's explanation in its EC ARC for the failure to meet its 2024 WMP targets in many cases does not provide adequate detail.

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<sup>124</sup> See Pub. Util. Code section 8386.3(c)(1), generally evidencing the importance of ensuring that wildfire mitigation spending is undertaken responsibly.

<sup>125</sup> Q1 QDR, Table 11.

<sup>126</sup> EC ARC, page 29.

<sup>127</sup> IE ARC, pages 21-24, 89, 101, 108, and 112.

Energy Safety made several observations above regarding the impact of SDG&E's 2024 WMP initiative performance, which are:

- Energy Safety's field inspections determined that SDG&E's initiative completeness data had inconsistencies in some 2024 WMP initiatives, which represent broader data management issues that SDG&E must address going forward.
- SDG&E met targets for a majority of its 2024 WMP initiatives, but it missed targets for a significant amount (44%) of its 2024 WMP initiatives. Some of those missed targets were related to grid hardening activities that would have otherwise reduced risk on SDG&E's system in the manner SDG&E committed to its customers and the broader California public and are part of a multi-year trend of missing several different WMP initiatives.
- SDG&E's EC ARC states that "it was necessary for SDG&E to reduce the scope of its WMP initiatives in 2024 to achieve the anticipated cost reductions;" but SDG&E's EC ARC does not provide an adequate justification for the trade-offs considered by SDG&E in determining which initiatives to scale down and by how much. And in some cases, the EC ARC did not provide a reasonable plan to ensure that initiative targets that it missed in 2024 wouldn't be missed again in future years.
- Although SDG&E did request target changes, SDG&E would have failed to meet its revised targets even if Energy Safety had granted SDG&E's requests. In other cases, SDG&E claimed that its pending GRC settlement agreement impacted the budgets for WMP work, but the settlement agreement did not impact the budgets for most of the initiatives claimed by SDG&E. Furthermore, SDG&E did not describe the details of the decision-making that went into these portfolio-level decisions.
- SDG&E's EC ARC did not sufficiently explain the reason for its missed targets, or in some cases provide a reasonable plan for ensuring that the same targets are not missed in future years, as required by Energy Safety's Performance Guidelines.
- SDG&E underspent its proposed expenditure on missed initiatives by a significant amount (16%). This underscores the importance of EC ARC's failure to give reasonable explanations for the failure to miss certain targets.
- Ten of SDG&E's 26 incomplete 2024 WMP initiative activities were assigned a risk impact that SDG&E did not fulfill due to the initiative activity work being incomplete. Therefore, this report concludes that 10 of SDG&E's missed 2024 WMP targets led to less risk reduction than SDG&E committed to its customers and the broader public in its 2024 WMP
- Seventeen of SDG&E's 2024 WMP initiatives had actual expenditures that deviated more than 10% from those proposed. For several 2024 WMP initiatives – such as strategic undergrounding, advanced protection, and strategic pole replacement – expenditure was at least 10% less than proposed in the WMP, and the targets for these initiatives were also missed.

Energy Safety remains committed to an open and collaborative approach to reducing wildfire risk in California. In order to achieve this goal, it is important that SDG&E effectively implement its own plan for wildfire risk reduction.

## 7. Ignition Risk Performance

Energy Safety requires electrical corporations to report data, such as ignitions, that help Energy Safety assess whether an electrical corporation is reducing its wildfire risk over time while also reducing its reliance on PSPS events. In order to consistently analyze these data between years and between ECs, Energy Safety uses a set of quantitative ignition risk performance metrics, as follows:<sup>128</sup>

- **Direct Metric - Ignition Rates:** This report defines ignitions as incidents in which electrical corporation infrastructure contributed to an ignition. SDG&E reports its total number of ignitions to Energy Safety on a quarterly basis.<sup>129</sup>
- **Proxy Metric - Wire Down Event Rate:** This report defines wire down events as incidents in which overhead electrical lines fall to the ground, land on objects, or become disconnected from their moors. SDG&E reports its total number of wire down events to Energy Safety on a quarterly basis.
- **Proxy Metric – Outage Event Rate:** This report defines outages as all unplanned outages experienced in SDG&E’s territory. PSPS outages are not included. SDG&E reports its total amount of outages to Energy Safety on a quarterly basis.

For this report, Energy Safety estimates SDG&E’s ignition risk performance metrics for the calendar years 2017 through 2024.

For direct and proxy performance metrics, Energy Safety converts the metric counts into rates by dividing them by SDG&E’s Overhead Circuit Miles (OCM). These rates for ignition risk events add nuance to the assessment and allow for comparisons across the ECs.

To see the raw counts of all ignition risk events and OCM values for each year used, see Appendix C.

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<sup>128</sup> Data for all figures in this section utilize a combination of SDG&E’s response to DR-280 and SDG&E data from the QDRs. Priority is given to the data request if both are available. Otherwise, 2015-2021 data are sourced from Q3 2022 QDR, 2022-2023 data are sourced from the Q4 2023 QDR, and 2024 data are sourced from the relevant quarter’s QDR (e.g., Q1 2024 data sourced from the Q1 2024 submission, Q2 2024 data sourced from the Q2 2024 submission, etc...).

<sup>129</sup> The term “ignition,” utilized by Energy Safety, is an ignition that meets all of the following criteria: 1) a self-propagating fire of material other than electrical and/or communication facilities, 2) the resulting fire traveled greater than one linear meter from the ignition point, and 3) the utility has knowledge that the fire occurred.

## 7.1 Ignition Rates

Ignition rates are the most direct measure of wildfire risk performance. There are limitations to only using ignition rates, however, due to the relatively small size of the dataset relative to other indications of risk, such as wires down and unplanned outages. As a result, this analysis of SDG&E's ignitions over time should be read in concert with the other metrics to give a full picture of an EC's performance over time.

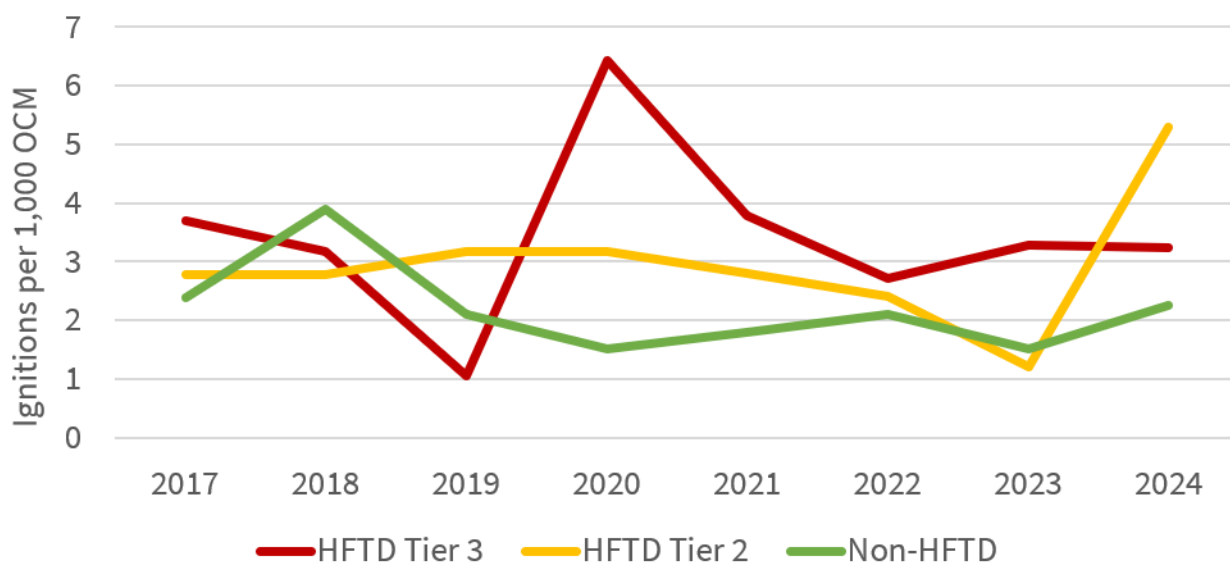
### Ignition Rates per Overhead Circuit Mile

To account for concurrent overhead grid expansion within SDG&E's territory and allow for comparisons with other utilities, ignitions normalized by OCM are provided as a rate of ignitions per 1,000 miles and delineated by HFTD Tier 3, HFTD Tier 2, and non-HFTD areas.

The normalized ignition rates per OCM have generally decreased between 2020 to 2023, followed by an increase in 2024. HFTD Tier 2 exhibited a large increase in 2024, while non-HFTD areas exhibited a more moderate increase in 2024 (Figure 2).

For a plot of ignition event raw counts, see Appendix C.

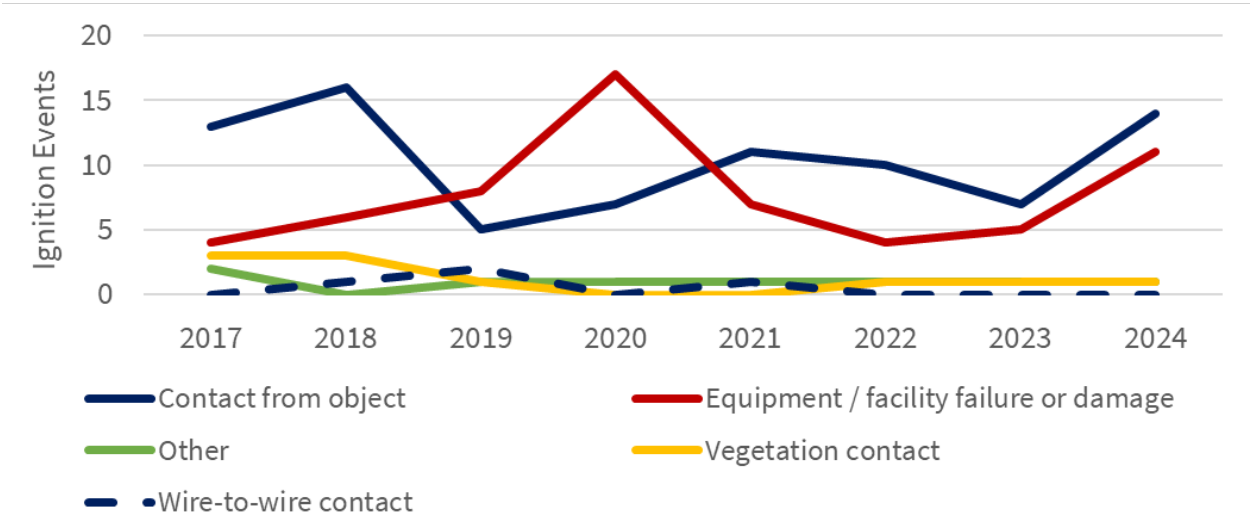
Figure 2. SDG&E Ignitions per OCM (2017-2024) by HFTD Tier



Raw Ignitions by Risk Driver

SDG&E’s ignition counts are shown to be delineated by risk drivers to indicate which causes are the most common. SDG&E ignition events are primarily caused by equipment or facility failure and contact from objects. Both of these main drivers showed increases in ignitions in 2024 compared to 2023 (Figure 3).

Figure 3. SDG&E Ignition Events Delineated by Risk Driver

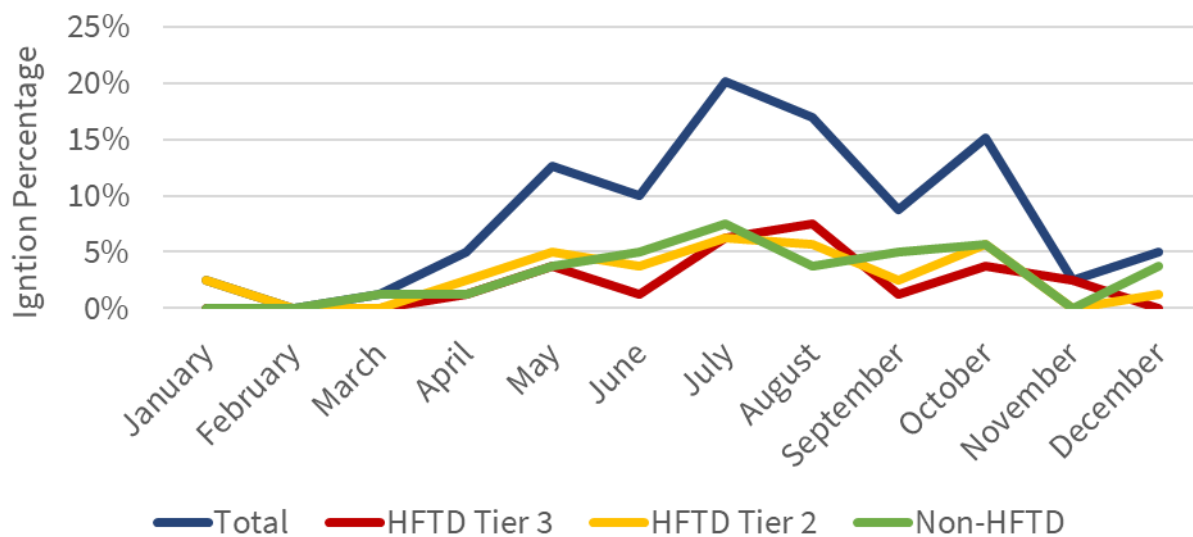


### Ignition Events Organized by Month and HFTD Tier for the 2022-2024 Period

Energy Safety estimated where, by HFTD tier, and when, by month of the year, ignition events recently occurred. The last three years (2022-2024) of events are averaged to account for noise in the sparse event data. In order to show the relative contribution of each HFTD tier, Energy Safety divided the 3-year average number of events for each month within each HFTD tier by the 3-year average number of all events for the year.

According to the assessment conducted, total ignition percentages are highest from May through October, with no discernible influence from any particular HFTD tier (Figure 4).

Figure 4. SDG&E 3-Year Average (2022-2024) of Monthly Ignition Events by HFTD Tier



## 7.2 Wire Down Event Rates

Wire down events are wildfire risks where a wire is touching the ground, touching an object, or has become disconnected from its mooring. This type of event poses a risk of ignition or a danger to people if that wire is also energized and therefore is tracked by Energy Safety in its Annual Performance Reports as a proxy metric for ignition risk.

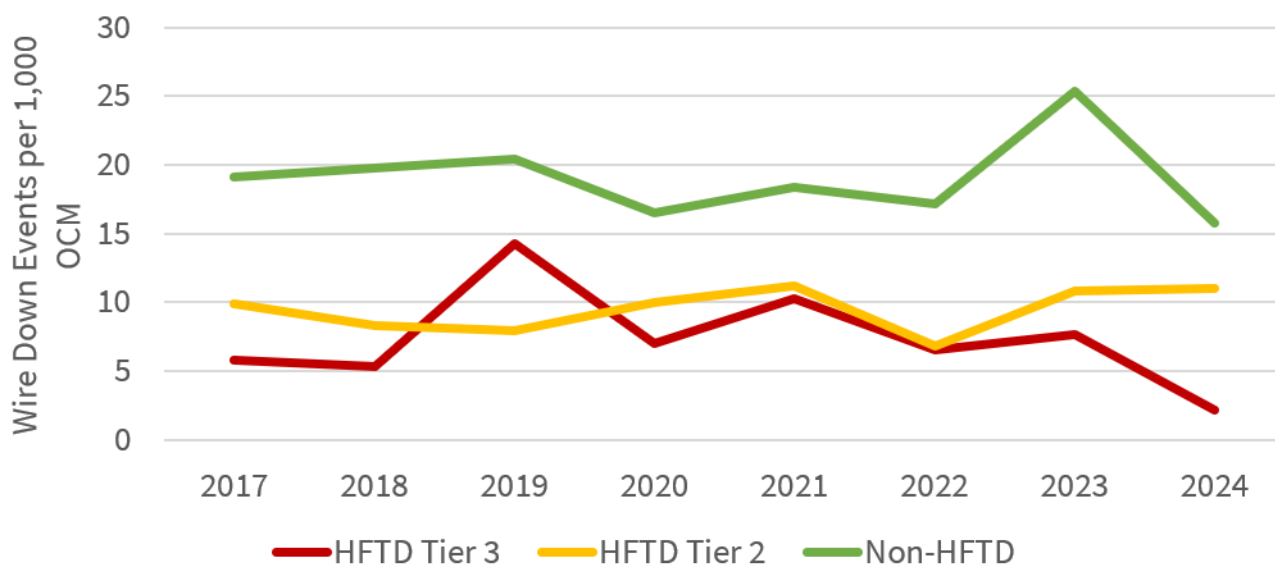
### Wire Down Events per Overhead Circuit Mile

To account for concurrent overhead grid expansion within SDG&E's territory and allow for comparisons with other utilities, wire down events normalized by OCM are provided as a rate of wire down events per 1,000 miles and delineated by HFTD Tier 3, HFTD Tier 2, and non-HFTD areas.

When accounting for OCMs, the wire down rates for HFTD Tier 3 and non-HFTD areas decreased from 2023 to 2024, resulting in an overall total decline in wire down rates when normalized by OCM (Figure 5).

For raw wire down event counts, see Appendix C.

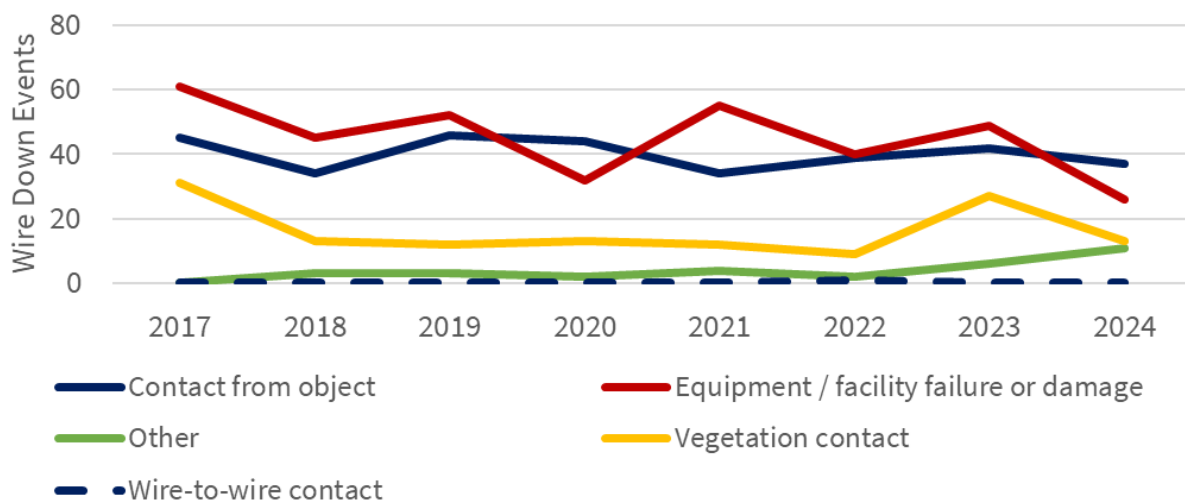
Figure 5. SDG&E Wire Down Events per OCM (2017-2024) by HFTD Tier



### Raw Wire Down Events by Risk Driver

SDG&E wire down event counts are shown delineated by risk drivers to indicate which causes are the most common (Figure 6). SDG&E's wire down events are primarily driven by contact from object and equipment/facility failure or damage. Equipment/facility failure or damage and vegetation-contact events decreased from 2023 to 2024, while wire-down events attributed to "other" have increased since 2022.

Figure 6. SDG&E Wire Down Events Delineated by Risk Driver

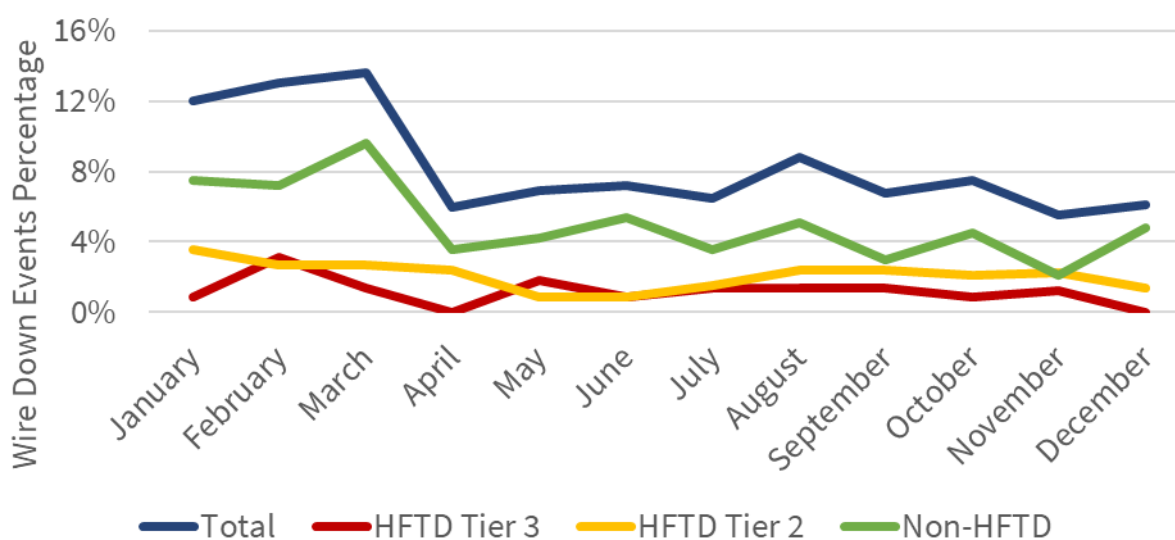


### Wire Down Events Organized by Month and HFTD Tier for the 2022-2024 Period

Energy Safety estimated where, by HFTD tier, and when, by month of the year, wire down events recently occurred. The last three years (2022-2024) of events are averaged to account for noise in the sparse event data. In order to show the relative contribution of each HFTD tier, Energy Safety divided the 3-year average number of events for each month within each HFTD tier by the 3-year average number of all events for the year.

According to the assessment conducted, the three-year monthly average percentage of wire down events is the highest between January through March, decreases in April, and generally remained at the decreased amount through December (Figure 7).

Figure 7. SDG&E 3-Year Average (2022-2024) of Monthly Wire Down Events by HFTD Tier



## 7.3 Outage Event Rates

Power outages (outages) are unplanned power outage events (i.e., do not include PSPS events) tabulated by circuits and not by number of customers impacted. Outage events are tracked as outcomes that may both cause ignitions and impact on a customer's quality of life.

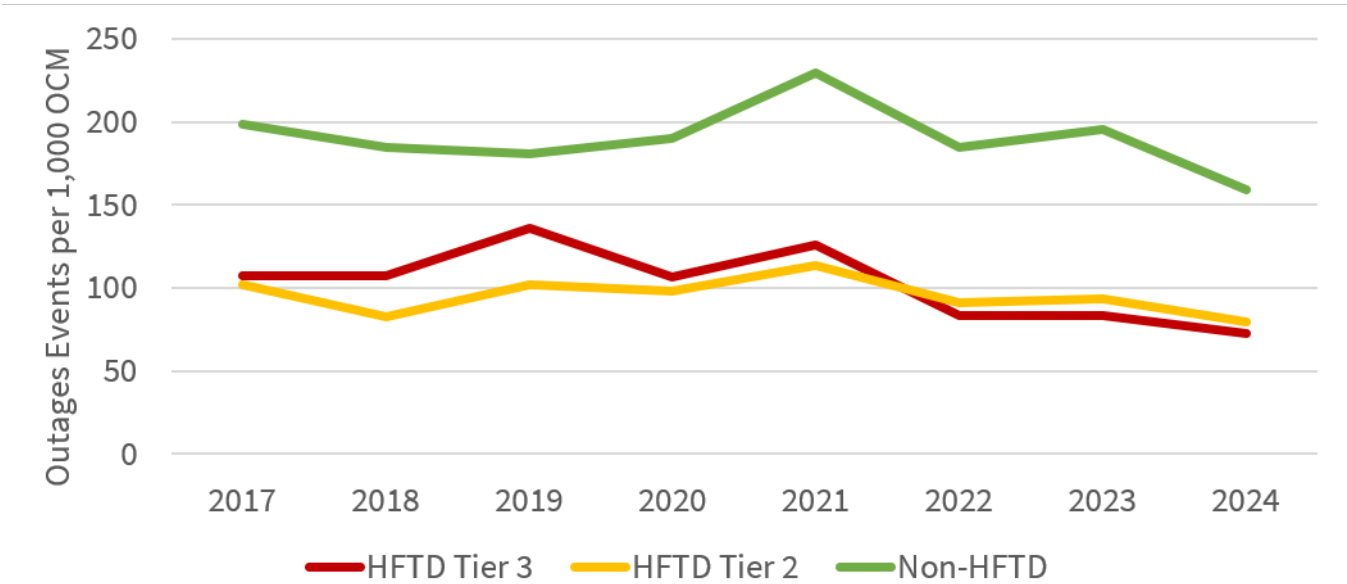
### Outage Events per Overhead Circuit Mile

To account for concurrent overhead grid expansion within SDG&E's territory and allow for comparisons with other utilities, outages normalized by OCM are provided as a rate of outages per 1,000 miles and delineated by HFTD Tier 3, HFTD Tier 2, and non-HFTD areas.

To see if the high rate of outage events in non-HFTD areas is explained by the larger number of line miles there, the events are normalized by OCM (Figure 8). When accounting for the number of line-miles in each area, the lower wildfire risk areas (i.e., non-HFTD) continue to have a higher rate of outages.

For raw outage event counts, see Appendix C.

Figure 8. SDG&E Outages per OCM (2017-2024) by HFTD Tier

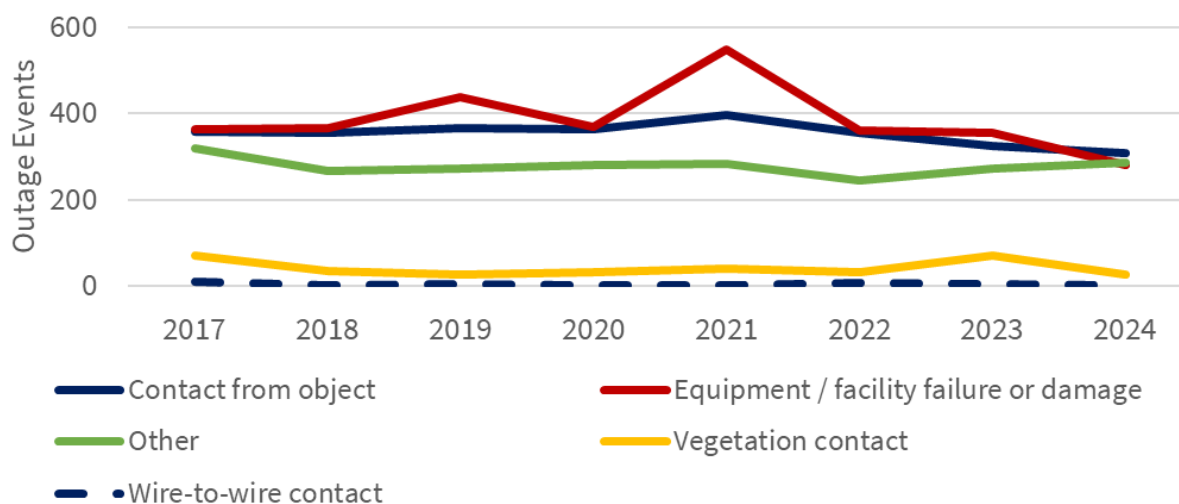


### Raw Outage Events by Risk Driver

SDG&E outages are shown delineated by risk drivers to indicate which causes are the most common (Figure 9).

SDG&E outage events are primarily caused by equipment or facility failure, contact from object, and “other.” Comparatively, vegetation and wire-to-wire contact outages occur at much lower frequencies.<sup>130</sup> Counts of outage events by each risk driver remain consistent from 2017 to 2024, with the exception of equipment/facility failure or damage, which experienced an increase in 2021.

Figure 9. SDG&E Outage Events Delineated by Risk Driver



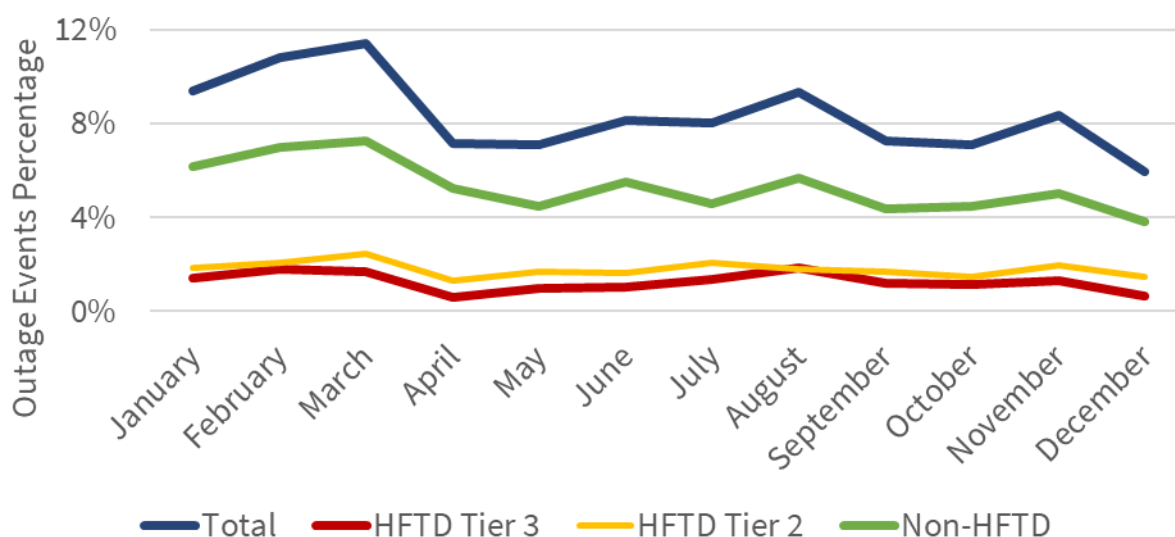
<sup>130</sup> “Other” risk drivers for outages include, but are not limited to, vandalism, theft, lightning, contamination, and emergency repairs.

### Outage Events Organized by Month and HFTD Tier for the 2022-2024 Period

Energy Safety estimated where, by HFTD tier, and when, by month of the year, outage events recently occurred. The last three years (2022-2024) of events are averaged to account for noise in the sparse event data. In order to show the relative contribution of each HFTD tier, Energy Safety divided the 3-year average number of events for each month within each HFTD tier by the 3-year average number of all outage events for the year.

According to the assessment conducted, the three-year monthly average percentage of outage events peaked in March, before exhibiting fluctuations through November and decreasing in December (Figure 10).

Figure 10. SDG&E 3-Year Average (2022-2024) of Monthly Outage Events by HFTD Tier



## 8. Public Safety Power Shutoff Event Performance

PSPS events are planned outages that are used as a wildfire mitigation tool during extreme fire conditions, particularly hot, dry, and windy days. While useful as a wildfire mitigation measure, PSPS events carry their own risks and adverse impacts on customers – particularly vulnerable customers who rely on electricity. As such, electrical corporations take mitigating actions to reduce the frequency, scope, duration, and impacts of PSPS events.

Energy Safety collects data from the ECs on their PSPS events and tracks their PSPS performance on a year-over-year basis. The purpose of this analysis is to monitor and publicize the impacts of an EC's PSPS performance. This analysis does not make any judgment about the reasonableness of the decision to employ PSPS.

The following four PSPS event parameters are presented by year and comprise the main components of the PSPS event performance assessment:

- *Scope* is measured as the total number of utility circuits impacted because of PSPS events;
- *Duration – Customer* is measured by the total number of customer-hours because of PSPS events;
- *Duration – Critical Infrastructure* is measured as the total number of critical infrastructure hours affected by PSPS events;<sup>131</sup> and
- *Impact* - is measured as the total number of customers affected by PSPS events.

Energy Safety converted the event parameters into rates by dividing them by SDG&E's PSPS frequency, measured as the count of all PSPS events. These rates for PSPS event parameters measure performance of EC PSPS event management and account for year-to-year variances in weather. They reflect the performance of the PSPS events once they have occurred.

To estimate when PSPS events typically occur throughout the year, the PSPS events by month for the last three years (2022 – 2024) have been averaged.

The data source for PSPS event parameters information is the QDRs.<sup>132</sup>

To see the raw counts of all PSPS event parameters and PSPS frequency for each year used, see Appendix C.

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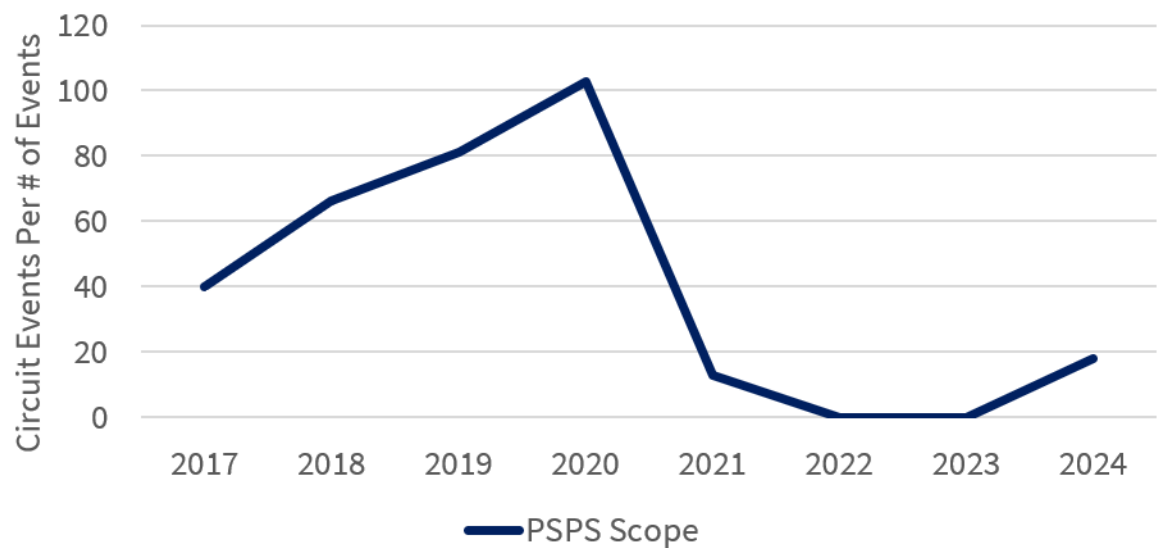
<sup>131</sup> The term “critical infrastructure hours” means the total number of hours that critical infrastructure was impacted by PSPS events. Energy Safety’s 2024 Compliance Guidelines (which were effective during the 2024 performance period) defines critical infrastructure as structures that are: chemical, communication, educational, emergency services, energy, government facilities, healthcare and public health, public safety answering points, transportation, water and wastewater systems, and other.

<sup>132</sup> 2022 Q3 QDR, Table 11; 2023 Q4 QDR, Table 10.

Scope of PSPS Events

Based on information provided by SDG&E, the rate of circuits impacted by PSPS events reached its highest point in 2020 before declining to zero in 2022 and 2023 and then increasing in 2024 (Figure 11).

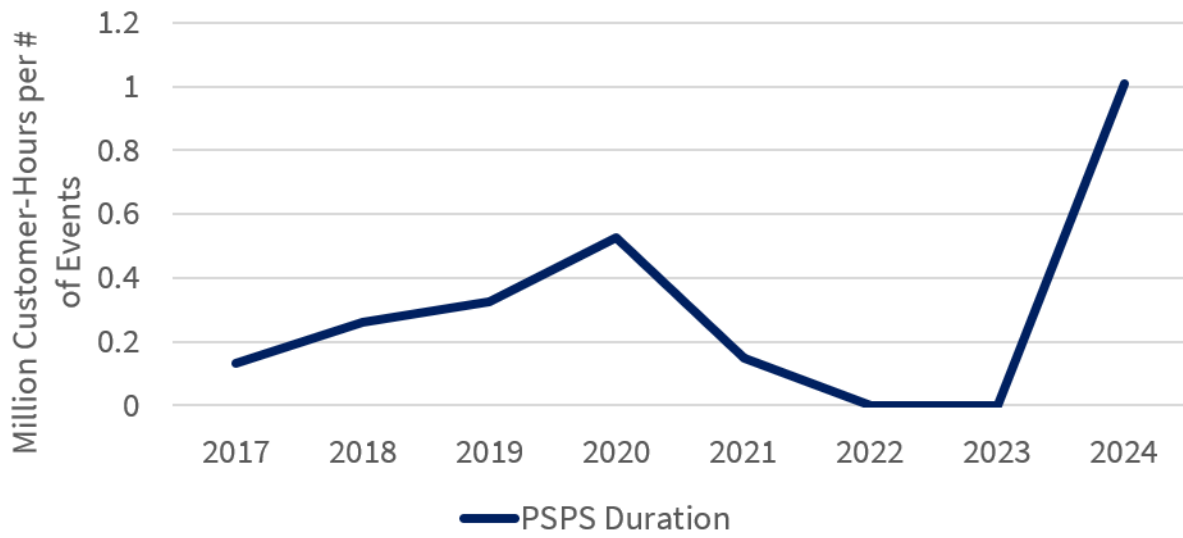
Figure 11. SDG&E PSPS Event Scope per Event (2017-2024)



### Duration-Customers of PSPS Events

Based on information provided by SDG&E, the rate of customer-hours impacted per event decreased to zero in 2022 and 2023 before reaching an all-time high in 2024 (Figure 12).

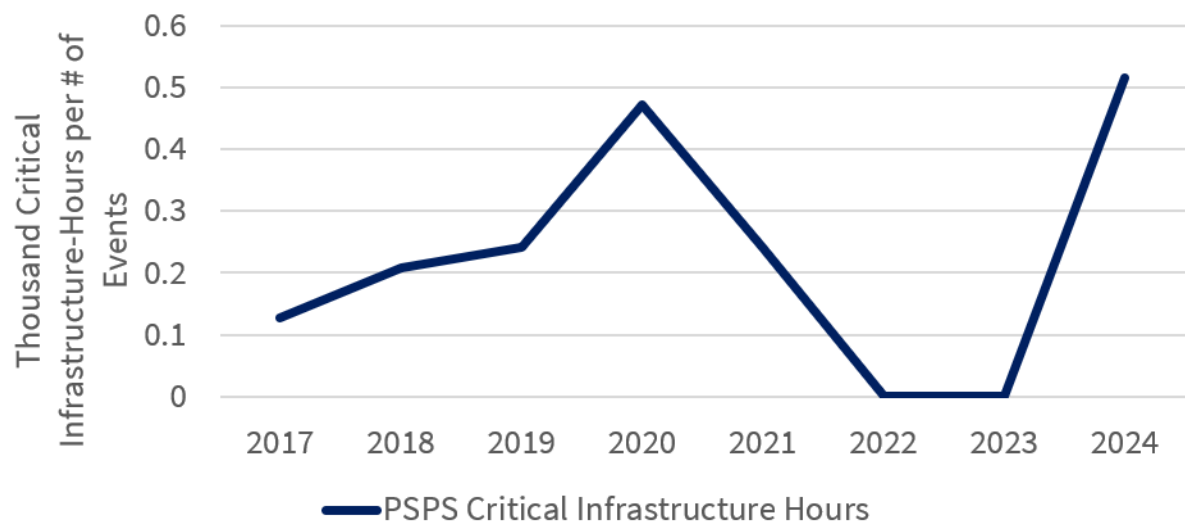
Figure 12. SDG&E PSPS Event Duration per Event (2017-2024)



Duration-Critical Infrastructure of PSPS Events

Based on information provided by SDG&E, the duration of PSPS events on critical infrastructure-hours per event peaked in 2020, declined to zero in 2022 and 2023, and then increased in 2024.

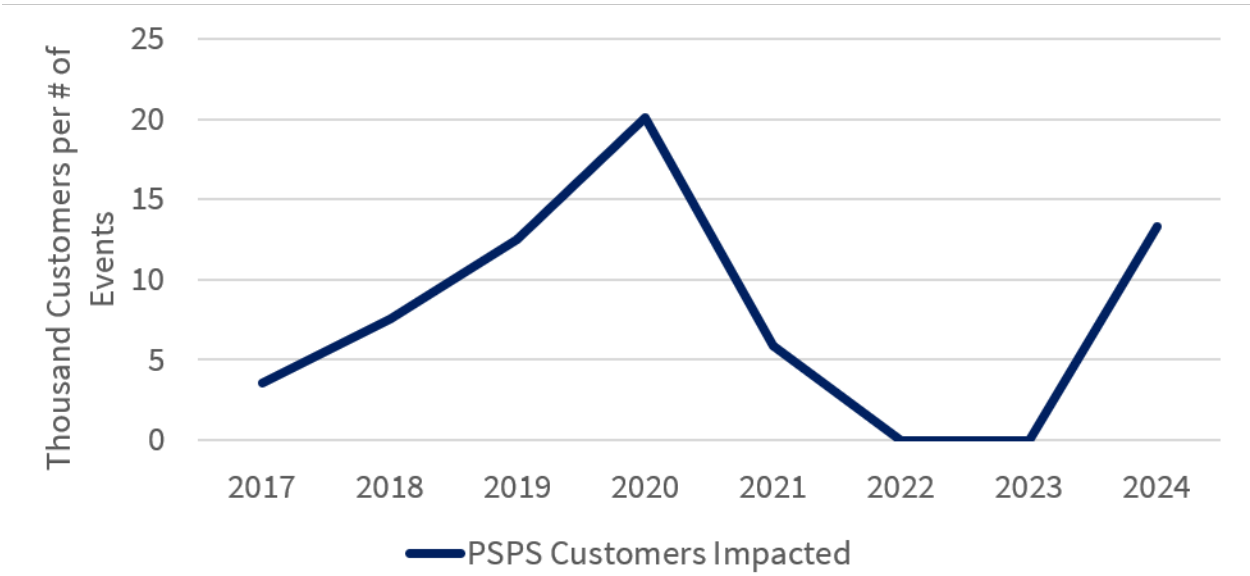
Figure 13. SDG&E PSPS Event Duration - Critical Infrastructure per Event (2017-2024)



Customers Impacted by PSPS Events

Based on information provided by SDG&E, the impact of PSPS events on customers increased through 2020 before declining to zero in 2022 and 2023 and then increasing notably in 2024 (Figure 14).

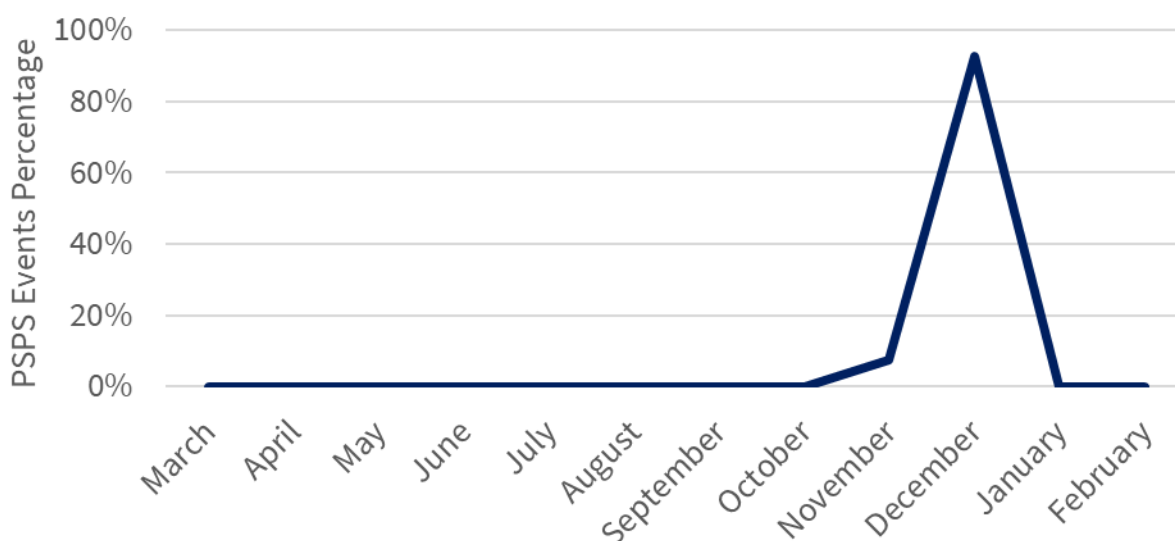
Figure 14. SDG&E PSPS Event Impacts on Number of Customer per Event (2017-2024)



### PSPS Events Organized by Month for the 2022-2024 Period

Energy Safety conducted a separate assessment to identify when PSPS events have occurred during the last three years. To do so, Energy Safety estimated SDG&E's monthly 3-year average count of PSPS event percentages for the 2022-2024 period (Figure 15). According to the assessment conducted, 92% of SDG&E's 3-year average for monthly PSPS events occur in December with just a few in November (Figure 15).

Figure 15. SDG&E 3-Year Average (2022-2024) Monthly PSPS Event Percentages



## 9. Outcome Metric Performance

Energy Safety collects data from the ECs regarding the consequences, or outcomes, of the ignitions caused by their equipment each year. Tracking this data over time allows for year-to-year assessment of the risk presented to the public by ignitions caused by the EC.

This section presents outcome performance metrics on EC-related wildfires including:

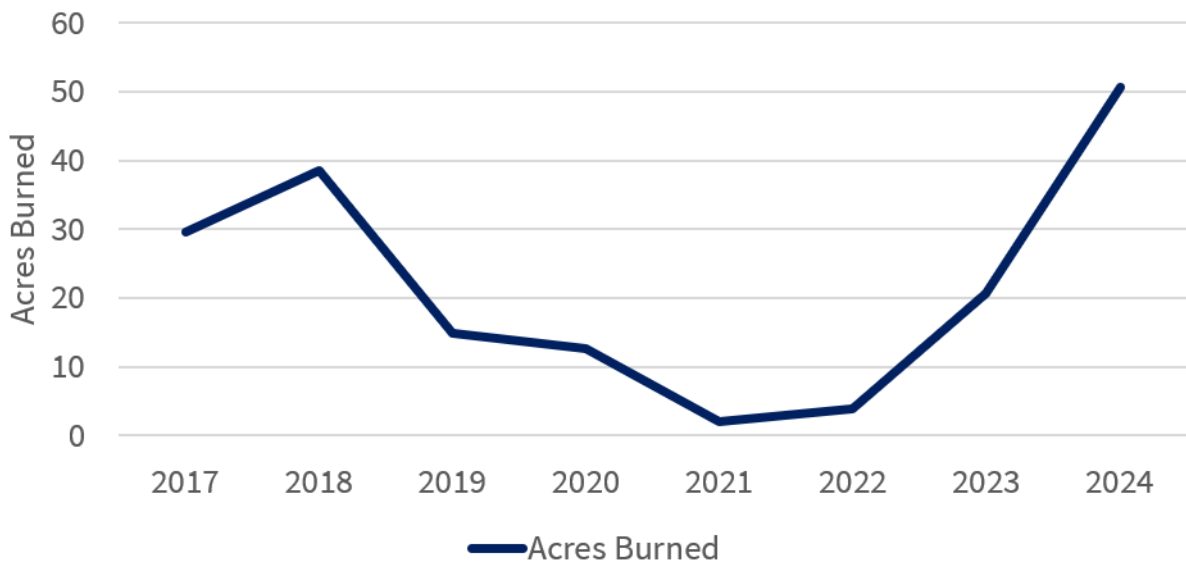
1. *Acres burned* – The total number of acres burned due to electrical corporation caused fires;
2. *Structures damaged/destroyed* - The total number of structures damaged or destroyed due to electrical corporation caused fires;
3. *Injuries/fatalities* - The total number of injuries and fatalities due to electrical corporation caused fires; and
4. *Value of assets destroyed* - The total value of assets destroyed due to electrical corporation caused fires.

The data source for outcomes performance metrics information is the QDRs.<sup>133</sup>

Acres Burned

This figure presents total acres burned associated with SDG&E-caused ignitions for the 2017–2024 period. The total number of acres burned by SDG&E-ignited wildfires was highest in 2024 and lowest in 2021 (Figure 16).

Figure 16. SDG&E Total Acres Burned (2017-2024)

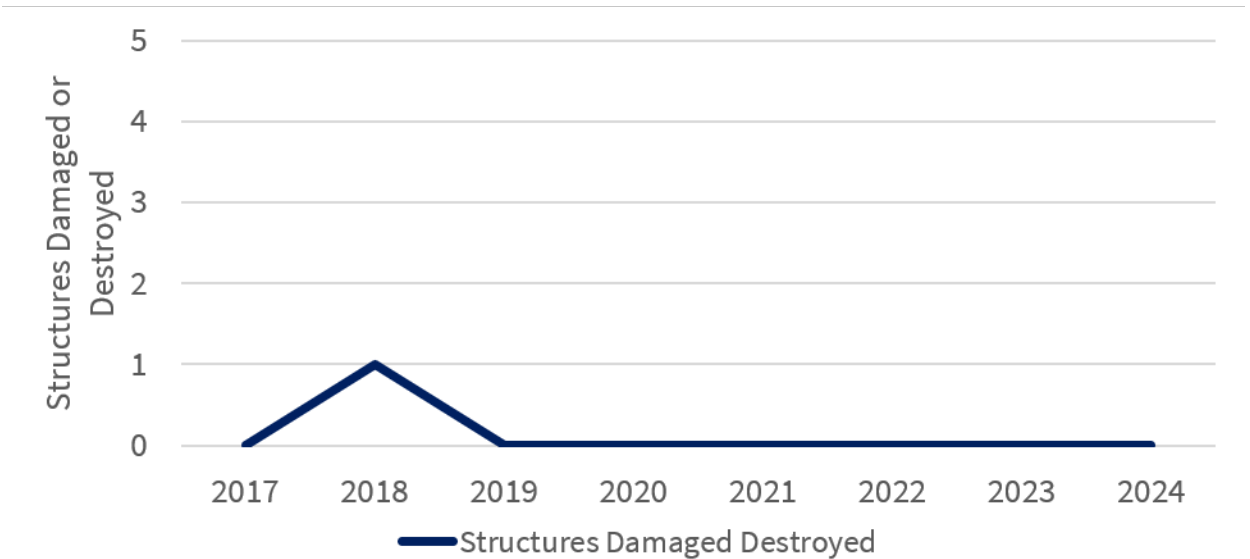


<sup>133</sup> 2023 Q3 QDR, Table 2; 2024 Q4 QDR, Table 2.

Structures Damaged or Destroyed

The total number of structures damaged or destroyed by SDG&E-ignited wildfires was highest in 2018 with no other structures that were damaged or destroyed through 2024 (Figure 17).

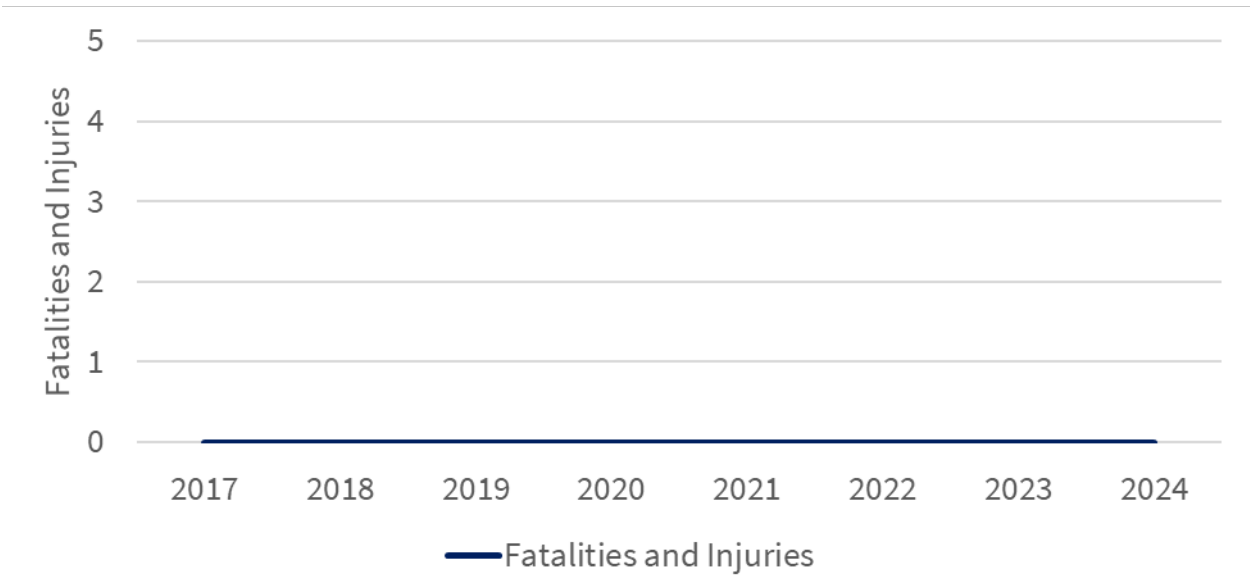
Figure 17. SDG&E Structures Damaged or Destroyed (2017-2024)



Injuries and Fatalities

SDG&E did not report any injuries or fatalities associated with SDG&E-caused wildfires from 2017 through 2024 (Figure 18).

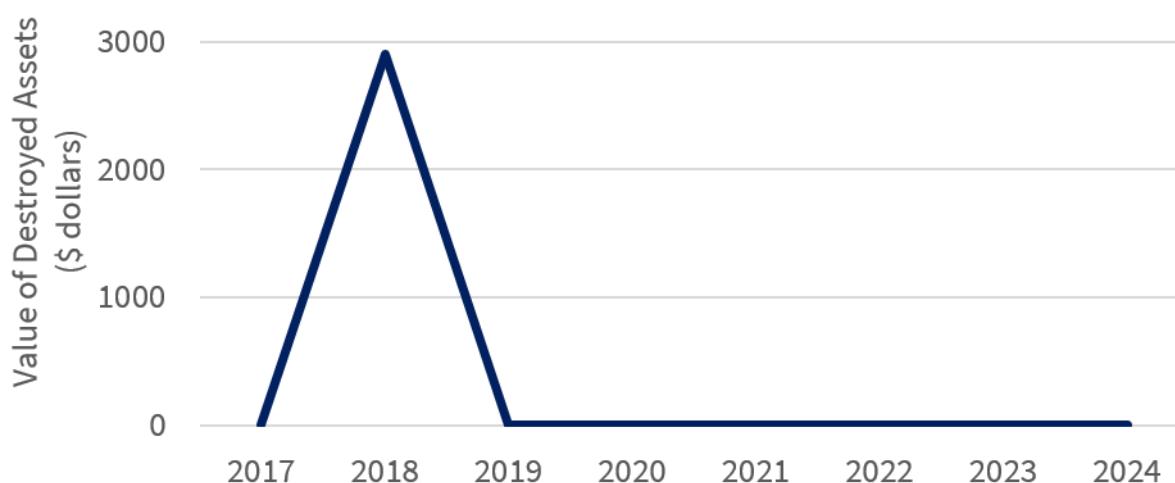
Figure 18. SDG&E Injuries and Fatalities (2017-2024)



### Value of Destroyed Assets

The value of assets destroyed by SDG&E-caused wildfires remained near zero for the period except for one asset destroyed in 2018 with a value of \$2,900 (Figure 19).

Figure 19. SDG&E Value of Destroyed Assets (2017-2024)



## 10. Reporting Accuracy and Completeness Performance

This section considers SDG&E's performance related to its documentation of its 2024 WMP implementation. To accomplish this, Energy Safety assessed a wide range of relevant information sources, including inspection field verifications, for signs of systemic weaknesses that may have hindered SDG&E's ability to understand the true status of its 2024 WMP implementation, and therefore to manage and accurately report on it.

Reporting accuracy and completeness is an important indicator of an electrical corporation's overall performance. If an electrical corporation cannot accurately track WMP work and report on progress toward its WMP targets, this calls into question 1) the situational awareness of the electrical corporation and therefore its ability to achieve its WMP risk reduction goals through planned wildfire safety mitigation activities, and 2) the validity of reporting WMP progress. This section of the report summarizes Energy Safety's assessment of five sources of reporting accuracy and completeness issues to provide an overall performance assessment. Energy Safety reviewed the following:

1. The consistency of data reporting between the QDR and the EC ARC is assessed for issues beyond routine data value updates;

2. VM Audit Reports are reviewed for issues identified;
3. Findings from the IE ARC QA/QC program maturity model evaluations are summarized along with other IE ARC data issues observed;
4. Consistency between QDR tabular and QDR spatial reporting is reviewed; and
5. Data accuracy issues identified by the inspections team are reviewed.

## 10.1 QDR as Compared to EC ARC

Energy Safety's analysis found two minor differences between the EC ARC and the Q4 QDR.<sup>134</sup> This indicates that SDG&E has maintained accuracy and alignment in their reported information across both reporting formats.

## 10.2 VM Audit Report Identified Issues

Energy Safety's 2024 VM Audit Report identified some data accuracy and completeness issues. SDG&E submitted incomplete data indicating it had not completed all prescribed mitigations for detailed and off-cycle inspections, resulting in a deficient finding for its Fall-In Mitigations (WMP.494) program.<sup>135</sup> In its CAP, SDG&E provided complete data indicating that all work was either completed, no longer required work, or was otherwise constrained.<sup>136</sup> As a continuing corrective action, SDG&E stated that it will ensure requisite detail and descriptions are included in future data request responses.

Additionally, SDG&E provided inconsistent data, within its program supporting documentation, regarding the total number of poles cleared for Pole Clearing (WMP.512) and Quality Assurance and Quality Control (WMP.505). According to the data provided for the Pole Clearing initiative (WMP.512), SDG&E cleared 36,001 poles; however, the data provided for the QA/QC (WMP.505) demonstrated that SDG&E cleared 36,457 poles.<sup>137</sup> Energy Safety expects SDG&E to further ensure accuracy, consistency, and completeness among data files submitted to support completion of work.

## 10.3 IE ARC Evaluation

The IE did not report any data accuracy or completeness issues in its IE ARC. With respect to the IE's evaluations of SDG&E's QA/QC program maturity model, SDG&E was described to be at the "routine" level for all maturity model metrics (see Section 5 of this report for more information).

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<sup>134</sup> For WMP.455 (Covered Conductor), SDG&E reported 35.91 miles in the QDR compared to 35.9 miles in the EC ARC. For WMP.543 (Transmission OH Hardening), SDG&E reported 9.08 miles in the QDR compared to 9.2 miles in the EC ARC.

<sup>135</sup> VM Audit Report, pages A-26 to A-27.

<sup>136</sup> VM Audit Report, pages 6-7.

<sup>137</sup> VM Audit Report, pages A-19 and A-36 to A-37.

## 10.4 Comparison of Spatial and Tabular QDR Data

Pursuant to Energy Safety's Data Guidelines, electrical corporations must submit quarterly data reports in both spatial and non-spatial (i.e., tabular) formats. Each of these quarterly reports must contain accurate information about the progress in meeting WMP targets throughout a compliance period.<sup>138</sup>

Energy Safety assessed the data submitted by SDG&E regarding the WMP work it completed in 2024, in both the spatial and tabular QDR submissions. Energy Safety found the following inconsistencies between spatial and tabular QDR submissions for 16 initiatives, which may call into question SDG&E's data reporting practices and initiative attainment (Table 7).<sup>139</sup>

*Table 7. Energy Safety Summary of Initiatives with Inconsistent QDR Reporting*

| Initiatives with Inconsistent QDR Reporting     | 2024 WMP Target <sup>140</sup> | Actual Recorded in Tabular QDR | Actual Recorded in Spatial QDR | Deviation (%) <sup>141</sup> |
|-------------------------------------------------|--------------------------------|--------------------------------|--------------------------------|------------------------------|
| Covered Conductor<br>8.1.2.1<br>WMP.455         | Target: 60 miles               | 35.91 miles                    | 72.7 miles                     | 102.5%                       |
| Strategic Undergrounding<br>8.1.2.2<br>WMP.473  | Target: 125 miles              | 112 miles                      | 171 miles                      | 52.7%                        |
| Distribution Underbuild<br>8.1.2.5.2<br>WMP.545 | Target: One mile               | 7 miles                        | 7.5 miles                      | 7.1%                         |

<sup>138</sup> Data Guidelines, page 1, pages 47-105, and pages 151-156.

<sup>139</sup> For more information regarding the unmet initiatives, see Appendix A.

<sup>140</sup> 2024 WMP, pages 131-404.

<sup>141</sup> When units of measure were comparable, such as with points and poles, Energy Safety proceeded to note the percent deviation between tabular and spatial data. When units of measure were not comparable such as with miles and points, Energy Safety did not attempt to present a percent deviation.

| Initiatives with Inconsistent QDR Reporting                  | 2024 WMP Target <sup>140</sup> | Actual Recorded in Tabular QDR | Actual Recorded in Spatial QDR | Deviation (%) <sup>141</sup>                                                    |
|--------------------------------------------------------------|--------------------------------|--------------------------------|--------------------------------|---------------------------------------------------------------------------------|
| Advanced Protection<br>8.1.2.8.1<br>WMP.463                  | Target: Eight circuits         | Five circuits                  | 396.9 miles                    | N/A<br><br>Units of measure differ between the Spatial QDR and the Tabular QDR. |
| Early Fault Detection<br>8.1.2.8.2<br>WMP.1195               | Target: 60 nodes               | 62 nodes                       | 27 points                      | 56.5%                                                                           |
| LTE Communication Network (DCRI)<br>8.1.2.8.3<br>WMP.549     | Target: 60 stations            | Three stations                 | 7 points                       | 133.3%                                                                          |
| Avian Protection<br>8.1.2.10.1<br>WMP.972                    | Target: 200 poles              | 774 poles                      | 702 points                     | 9.3%                                                                            |
| Strategic Pole Replacement Program<br>8.1.2.10.2<br>WMP.1189 | Target: 200 poles              | 40 poles                       | 34 points                      | 15%                                                                             |

| Initiatives with Inconsistent QDR Reporting                      | 2024 WMP Target <sup>140</sup>          | Actual Recorded in Tabular QDR  | Actual Recorded in Spatial QDR | Deviation (%) <sup>141</sup>                                                |
|------------------------------------------------------------------|-----------------------------------------|---------------------------------|--------------------------------|-----------------------------------------------------------------------------|
| PSPS Sectionalizing<br>8.1.2.11.1<br>WMP.461                     | Target: Ten switches                    | 18 switches                     | 14 points                      | 22.2%                                                                       |
| Transmission Overhead Detailed Inspections<br>8.1.3.2<br>WMP.479 | Target: 1,960 inspections               | 2,940 inspections               | 2,935 points                   | 0.17%                                                                       |
| Hotline Clamps<br>8.1.4.5<br>WMP.464                             | Target: 250 hotline clamps              | 678 hotline clamps              | 661 points                     | 56.3%                                                                       |
| Lightning Arrestors<br>8.1.4.6<br>WMP.550                        | Target: 1,848 arresters                 | 1,654 arrestors                 | 1,547 points                   | 59.7%                                                                       |
| Off-Cycle Patrol<br>8.2.1.2.1<br>WMP.508                         | Target: 106 Vegetation Management Areas | 106 Vegetation Management Areas | Zero                           | 100%<br><br>Recorded spatial QDR data results in the initiative as not met. |

Table 8. Energy Safety Summary of Ignition Risk Metrics with Inconsistent QDR Reporting

| Risk Metrics with Inconsistent QDR Reporting | Actual Recorded in Tabular QDR | Actual Recorded in Spatial QDR | Deviation (%) |
|----------------------------------------------|--------------------------------|--------------------------------|---------------|
| 2024 Total Ignitions                         | 27                             | 31                             | 15%           |
| 2024 Total Wire Down Events                  | 87                             | 87                             | 0%            |
| 2024 Total Unplanned Outage Events           | 899                            | 899                            | 0%            |

10.5 Data Accuracy and Completeness Conclusions

Energy Safety’s field inspections of SDG&E’s 2024 WMP work identified data accuracy issues regarding several initiatives. Energy Safety’s assessment identified three NOV’s for data accuracy and 17 NOV’s for completeness issues. Additionally, Energy Safety’s VMA Report identified initiatives with insufficient reporting of work completion. Continuing with the completeness issues, five WMP initiatives with targets for 2024 were not reported in the QDR or EC ARC. Finally, the variance in spatial and tabular initiative completion reported in its QDR was significant. Energy Safety’s assessment of all the initiatives by data source can be found in Appendix A.

SDG&E’s inadequate performance in this area is follows previous Energy Safety findings that SDG&E needed to improve its data accuracy and reporting on WMP initiative activities (see, e.g., the 2020 and 2022 Energy Safety Annual Reports on Compliance for SDG&E).

Taken together, this analysis shows that SDG&E must continue to improve the accuracy of its WMP implementation documentation practices. Energy Safety will monitor SDG&E’s reporting and expects improvements regarding the accuracy of SDG&E’s documentation and tracking processes going forward.

11. Conclusion

Energy Safety makes the following observations and recommendations regarding SDG&E’s execution of its WMP initiative activities and the performance of its infrastructure relative to its wildfire risk in 2024.

WMP Initiative Attainment Performance

SDG&E completed only 33 (56%) of 59 initiatives, including six of the 10 initiatives with the largest proposed expenditure. SDG&E’s justification for this low completion rate was

inadequate, and this meant SDG&E did not reduce wildfire risk in the manner committed to its customers and the people of California through its WMP.

In its EC ARC, SDG&E asserted that its GRC-related settlement agreement before the California Public Utilities Commission, which was pending in 2024, and Energy Safety's denial of a related Petition to Amend and change order request, were the reasons for several of the missed initiative targets. In other cases, SDG&E simply did not report the reasons for the missed initiative targets.

These rationales did not provide adequate justification for the missed targets. Moreover, in several cases, SDG&E failed to meet even the revised targets it proposed in its change order request that was denied by Energy Safety. In other cases, the initiatives that SDG&E claimed were impacted by the GRC settlement were not affected by the settlement's terms.

SDG&E's performance with respect to its 2024 WMP initiative targets is part of a continuing trend. No fewer than eight initiative activity targets were missed in 2020, 10 were missed in 2021, six were missed in 2022, and 10 were missed in 2023. SDG&E's failure to meet nearly half of its WMP initiative targets in 2024 is a worse performance than observed in previous years and is part of a troubling trend that SDG&E should reverse. Furthermore, several initiatives that missed targets in 2024 (such as undergrounding and strategic pole replacement) also missed their targets at least twice during the 2020-2023 period.

The recurrence of missed targets suggests a systemic issue with SDG&E's implementation of its WMP work that it must address. Energy Safety will continue to monitor SDG&E's performance and push SDG&E to consistently meet its targets in these areas.

### **Ignition Risk Performance**

Regarding ignition risk, Energy Safety identified that ignitions increased by 13 events from 2023 to 2024 in HFTD Tier 2 areas, driven primarily by contact from objects and equipment or facility failure or damage. SDG&E did not report any structural losses, injuries, or fatalities due to SDG&E-caused wildfires in 2024.

### **Public Safety Power Shutoff Performance**

The impact of SDG&E's PSPS events increased in 2024 with four events compared to previous years. SDG&E's PSPS events impacted nearly 15,000 customers and more than 500 elements of critical infrastructure, for events as long as one million customer hours (a 100% increase from the previous historic high of around 500,000 million customer hours in 2020). Energy Safety's analysis of the impacts of SDG&E's 2024 PSPS performance does not include a judgment about whether the decision by SDG&E to employ PSPS in a given circumstance was reasonable.

### **Data Reporting Accuracy and Completeness Performance**

SDG&E's reporting accuracy and completeness requires improvement. Energy Safety identified 19 NOV's for 2024 WMP work and discrepancies between spatial and tabular data for

14 (24%) of SDG&E's initiatives, including incomplete vegetation management data. SDG&E's issues with the accuracy of its data accuracy and completeness were noted in previous annual reports by Energy Safety.

Given the ongoing issues with SDG&E's data reporting accuracy and completeness, this APR amplifies Energy Safety's previous expectation that SDG&E improve its data collection and reporting practices. Future performance reporting will continue to focus on this issue to ensure that SDG&E improves.

### **Conclusion**

Going forward, SDG&E must show, through consistent action, that it will honor its WMP commitments and thus meaningfully reduce wildfire risk in the manner committed to its customers and the people of California through its WMP. Energy Safety will continue to monitor SDG&E's implementation of its WMP so that SDG&E improves its ability to eliminate utility-caused catastrophic wildfires in California.

## 12. References

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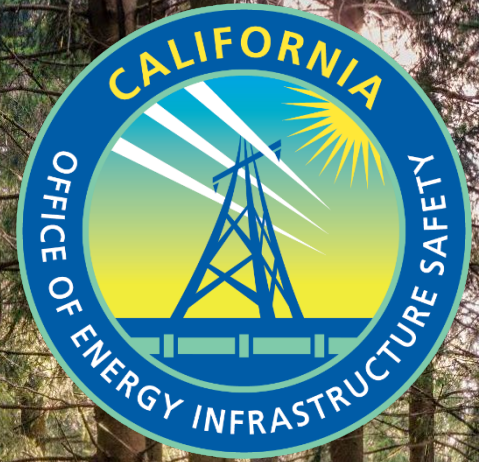
# DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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# APPENDICES

## 13. Appendices

### Appendix A: SDG&E Information on WMP Initiative Activity Attainment

Table 10 summarizes each of SDG&E's 59 initiative activity targets from its 2024 WMP, SDG&E's self-reporting on performance contained in its QDR, SDG&E's EC ARC, the IE ARC, and the VM Audit Report.<sup>142</sup>

*Table 10. WMP Initiative Activity Attainment Information*

| 2024 WMP Initiative Activity            | 2024 WMP Activity Target | QDR                                                | EC ARC                                            | IE ARC                                            | Attainment Status      | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|-----------------------------------------|--------------------------|----------------------------------------------------|---------------------------------------------------|---------------------------------------------------|------------------------|------------------------------------|----------------------------------|
| Covered Conductor<br>8.1.2.1<br>WMP.455 | 60 miles                 | Not met<br>Target: 60 miles<br>Actual: 35.91 miles | Not met<br>Target: 60 miles<br>Actual: 35.9 miles | Not met<br>Target: 60 miles<br>Actual: 35.9 miles | Not met <sup>143</sup> | \$79,890                           | \$78,642                         |

<sup>142</sup> 2024 Q4 QDR, EC ARC, IE ARC, and VMA Report.

<sup>143</sup> Energy Safety's field inspection findings and analysis (Section 6.3, Table 3) notes a reliable actual accounting of 35.2 miles as opposed to 35.9 miles recorded in other annual reporting sources. Alternatively, SDG&E's geospatial data reported 72.7 miles complete. This conflict is noted in Section 10.4.

| 2024 WMP Initiative Activity                            | 2024 WMP Activity Target | QDR                                                 | EC ARC                                             | IE ARC                                              | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|---------------------------------------------------------|--------------------------|-----------------------------------------------------|----------------------------------------------------|-----------------------------------------------------|-------------------|------------------------------------|----------------------------------|
| Strategic Undergrounding<br>8.1.2.2<br>WMP.473          | 125 miles                | Not met<br>Target: 125 miles<br>Actual: 112 miles   | Not met<br>Target: 125 miles<br>Actual: 112 miles  | Not met<br>Target: 125 miles<br>Actual: 112 miles   | Not met           | \$301,729                          | \$217,140                        |
| Transmission Overhead Hardening<br>8.1.2.5.2<br>WMP.543 | 10.2 miles               | Not met<br>Target: 10.2 miles<br>Actual: 9.08 miles | Not met<br>Target: 10.2 miles<br>Actual: 9.2 miles | Not met<br>Target: 10.2 miles<br>Actual: 9.08 miles | Not met           | \$0                                | \$0 <sup>144</sup>               |

<sup>144</sup> EC ARC, page 36. SDG&E noted that expenditures for this program were Federal Energy Regulatory Commission (FERC)-funded and are not reported in the WMP.

| 2024 WMP Initiative Activity                    | 2024 WMP Activity Target | QDR                                                                   | EC ARC                                                                | IE ARC                                                                | Attainment Status  | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|-------------------------------------------------|--------------------------|-----------------------------------------------------------------------|-----------------------------------------------------------------------|-----------------------------------------------------------------------|--------------------|------------------------------------|----------------------------------|
| Distribution Underbuild<br>8.1.2.5.2<br>WMP.545 | One mile                 | Met<br><br>Target: One mile<br><br>Actual: Seven miles                | Met<br><br>Target: One mile<br><br>Actual: Seven miles                | Met<br><br>Target: One mile<br><br>Actual: Seven miles                | Met <sup>145</sup> | \$12,464                           | \$12,039                         |
| Microgrids<br>8.1.2.7<br>WMP.462                | Four microgrids          | Not met<br><br>Target: Four microgrids<br><br>Actual: Zero microgrids | Not met<br><br>Target: Four microgrids<br><br>Actual: Zero microgrids | Not met<br><br>Target: Four microgrids<br><br>Actual: Zero microgrids | Not met            | \$7,715                            | \$7,396                          |

<sup>145</sup> Energy Safety's audit of WMP.545 identified 7.5 miles reported in SDG&E's spatial data as shown in Table 7.

| 2024 WMP Initiative Activity                   | 2024 WMP Activity Target | QDR                                                                | EC ARC                                                             | IE ARC                                                             | Attainment Status      | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|------------------------------------------------|--------------------------|--------------------------------------------------------------------|--------------------------------------------------------------------|--------------------------------------------------------------------|------------------------|------------------------------------|----------------------------------|
| Advanced Protection<br>8.1.2.8.1<br>WMP.463    | Eight circuits           | Not met<br><br>Target: Eight circuits<br><br>Actual: Five circuits | Not met<br><br>Target: Eight circuits<br><br>Actual: Five circuits | Not met<br><br>Target: Eight circuits<br><br>Actual: Five circuits | Not met <sup>146</sup> | \$15,810                           | \$11,130                         |
| Early Fault Detection<br>8.1.2.8.2<br>WMP.1195 | 60 nodes                 | Met<br><br>Target: 60 nodes<br><br>Actual: 62 nodes                | Met<br><br>Target: 60 nodes<br><br>Actual: 62 nodes                | Met<br><br>Target: 60 nodes<br><br>Actual: 62 nodes                | Met                    | \$4,170                            | \$3,600                          |

<sup>146</sup> Energy Safety's audit of WMP.463 identified 396.9 miles reported in SDG&E's spatial data as shown in Table 7.

| 2024 WMP Initiative Activity                                                                                   | 2024 WMP Activity Target | QDR                                                              | EC ARC                                                           | IE ARC                                                           | Attainment Status      | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|----------------------------------------------------------------------------------------------------------------|--------------------------|------------------------------------------------------------------|------------------------------------------------------------------|------------------------------------------------------------------|------------------------|------------------------------------|----------------------------------|
| LTE Communication Network (Distribution Communications Reliability Improvement [DCRI])<br>8.1.2.8.3<br>WMP.549 | 60 stations              | Not met<br><br>Target: 60 stations<br><br>Actual: Three stations | Not met<br><br>Target: 60 stations<br><br>Actual: Three stations | Not met<br><br>Target: 60 stations<br><br>Actual: Three stations | Not met <sup>147</sup> | \$31,686                           | \$22,506                         |
| Avian Protection<br>8.1.2.10.1<br>WMP.972                                                                      | 200 poles                | Met<br><br>Target: 200 poles<br><br>Actual: 774 poles            | Met<br><br>Target: 200 poles<br><br>Actual: 774 poles            | Met<br><br>Target: 200 poles<br><br>Actual: 774 poles            | Met <sup>148</sup>     | \$1,113                            | \$1,108                          |

<sup>147</sup> Energy Safety's audit of WMP.549 identified 7 points reported in SDG&E's spatial data as shown in Table 7.

<sup>148</sup> Although SDG&E met the target for its avian protection initiative, Energy Safety's inspection findings and analysis (Section 6.3) notes a reliable actual accounting of 661 poles as opposed to 774 poles recorded in other annual reporting sources.

| 2024 WMP Initiative Activity                                 | 2024 WMP Activity Target | QDR                                                | EC ARC                                             | IE ARC                                             | Attainment Status      | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|--------------------------------------------------------------|--------------------------|----------------------------------------------------|----------------------------------------------------|----------------------------------------------------|------------------------|------------------------------------|----------------------------------|
| Strategic Pole Replacement Program<br>8.1.2.10.2<br>WMP.1189 | 267 poles                | Not met<br>Target: 267 poles<br>Actual: 40 poles   | Not met<br>Target: 267 poles<br>Actual: 40 poles   | Not met<br>Target: 267 poles<br>Actual: 40 poles   | Not met <sup>149</sup> | \$7,019                            | \$2,605                          |
| PSPS Sectionalizing<br>8.1.2.11.1<br>WMP.461                 | Ten switches             | Met<br>Target: Ten switches<br>Actual: 18 switches | Met<br>Target: Ten switches<br>Actual: 18 switches | Met<br>Target: Ten switches<br>Actual: 18 switches | Met <sup>150</sup>     | \$1,786                            | \$2,135                          |

<sup>149</sup> Energy Safety's audit of WMP.1189 identified 34 points reported in SDG&E's spatial data as shown in Table 7.

<sup>150</sup> Energy Safety's audit of WMP.461 identified 14 points reported in SDG&E's spatial data as shown in Table 7.

| 2024 WMP Initiative Activity                                     | 2024 WMP Activity Target | QDR                                                             | EC ARC                                                          | IE ARC                                                          | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|------------------------------------------------------------------|--------------------------|-----------------------------------------------------------------|-----------------------------------------------------------------|-----------------------------------------------------------------|-------------------|------------------------------------|----------------------------------|
| Standby Power Program<br>8.1.2.11.2<br>WMP.468                   | 300 generators           | Not met<br>Target: 300 generators<br>Actual: 54 generators      | Not met<br>Target: 300 generators<br>Actual: 54 generators      | Not met<br>Target: 300 generators<br>Actual: 54 generators      | Not met           | \$5,377                            | \$5,207                          |
| Distribution Overhead Detailed Inspections<br>8.1.3.1<br>WMP.478 | 15,450 inspections       | Met<br>Target: 15,450 inspections<br>Actual: 16,503 inspections | Met<br>Target: 15,450 inspections<br>Actual: 16,503 inspections | Met<br>Target: 15,450 inspections<br>Actual: 16,503 inspections | Met               | \$6,841                            | \$8,550                          |

| 2024 WMP Initiative Activity                                     | 2024 WMP Activity Target | QDR                                                               | EC ARC                                                            | IE ARC                                                            | Attainment Status  | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|------------------------------------------------------------------|--------------------------|-------------------------------------------------------------------|-------------------------------------------------------------------|-------------------------------------------------------------------|--------------------|------------------------------------|----------------------------------|
| Transmission Overhead Detailed Inspections<br>8.1.3.2<br>WMP.479 | 1,960 inspections        | Met<br>Target: 1,960 inspections<br>Actual: 2,940 inspections     | Met<br>Target: 1,960 inspections<br>Actual: 2,940 inspections     | Met<br>Target: 1,960 inspections<br>Actual: 2,940 inspections     | Met <sup>151</sup> | \$1,743                            | \$1,030                          |
| Distribution Infrared Inspections<br>8.1.3.3<br>WMP.481          | 9,532 inspections        | Not met<br>Target: 9,532 inspections<br>Actual: 6,398 inspections | Not met<br>Target: 9,532 inspections<br>Actual: 6,398 inspections | Not met<br>Target: 9,532 inspections<br>Actual: 6,398 inspections | Not met            | \$10                               | \$145                            |

<sup>151</sup> Energy Safety's audit of WMP.479 identified 2,935 points reported in SDG&E's spatial data as shown in Table 7.

| 2024 WMP Initiative Activity                            | 2024 WMP Activity Target | QDR                                                                | EC ARC                                                             | IE ARC                                                             | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|---------------------------------------------------------|--------------------------|--------------------------------------------------------------------|--------------------------------------------------------------------|--------------------------------------------------------------------|-------------------|------------------------------------|----------------------------------|
| Transmission Infrared Inspections<br>8.1.3.4<br>WMP.482 | 6,179 inspections        | Met<br>Target: 6,179 inspections<br>Actual: 7,161 inspections      | Met<br>Target: 6,179 inspections<br>Actual: 7,161 inspections      | Met<br>Target: 6,179 inspections<br>Actual: 7,161 inspections      | Met               | \$0                                | \$0 <sup>152</sup>               |
| Distribution Drone Assessments<br>8.1.3.7<br>WMP.552    | 13,500 inspections       | Not met<br>Target: 13,500 inspections<br>Actual: 6,529 inspections | Not met<br>Target: 13,500 inspections<br>Actual: 6,529 inspections | Not met<br>Target: 13,500 inspections<br>Actual: 6,529 inspections | Not met           | \$95,493                           | \$106,265                        |

<sup>152</sup> EC ARC, page 42. SDG&E noted that expenditures for this program were FERC-funded and are not reported in the WMP.

| 2024 WMP Initiative Activity                                   | 2024 WMP Activity Target | QDR                                     | EC ARC                                  | IE ARC                                  | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|----------------------------------------------------------------|--------------------------|-----------------------------------------|-----------------------------------------|-----------------------------------------|-------------------|------------------------------------|----------------------------------|
| Distribution Overhead Patrol Inspections<br>8.1.3.8<br>WMP.488 | 86,197 inspections       | Met<br>Target: 86,197<br>Actual: 86,140 | Met<br>Target: 86,197<br>Actual: 86,140 | Met<br>Target: 86,197<br>Actual: 86,140 | Met               | \$857                              | \$2,708                          |
| Transmission Overhead Patrol Inspections<br>8.1.3.9<br>WMP.489 | 6,337 inspections        | Met<br>Target: 6,337<br>Actual: 7,336   | Met<br>Target: 6,337<br>Actual: 7,336   | Met<br>Target: 6,337<br>Actual: 7,336   | Met               | \$0                                | \$0 <sup>153</sup>               |

<sup>153</sup> EC ARC, page 44. SDG&E noted that expenditures for this program were FERC-funded and are not reported in the WMP.

| 2024 WMP Initiative Activity                                          | 2024 WMP Activity Target | QDR                                                                   | EC ARC                                                                | IE ARC                                                                | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|-----------------------------------------------------------------------|--------------------------|-----------------------------------------------------------------------|-----------------------------------------------------------------------|-----------------------------------------------------------------------|-------------------|------------------------------------|----------------------------------|
| Transmission<br>69kV Tier 3 Visual Inspections<br>8.1.3.10<br>WMP.555 | 1,632 inspections        | Met<br><br>Target: 1,632 inspections<br><br>Actual: 1,605 inspections | Met<br><br>Target: 1,632 inspections<br><br>Actual: 1,605 inspections | Met<br><br>Target: 1,632 inspections<br><br>Actual: 1,605 inspections | Met               | \$0                                | \$0 <sup>154</sup>               |
| Substation Patrol Inspections<br>8.1.3.11<br>WMP.492                  | 384 inspections          | Met<br><br>Target: 384 inspections<br><br>Actual: 379 inspections     | Met<br><br>Target: 384 inspections<br><br>Actual: 379 inspections     | Met<br><br>Target: 384 inspections<br><br>Actual: 379 inspections     | Met               | \$0                                | \$0 <sup>155</sup>               |

<sup>154</sup> EC ARC, page 44. SDG&E noted that expenditures for this program were FERC-funded and are not reported in the WMP.

<sup>155</sup> EC ARC, page 45. SDG&E noted that expenditures for this program were FERC-funded and are not reported in the WMP.

| 2024 WMP Initiative Activity              | 2024 WMP Activity Target  | QDR                                                                                       | EC ARC                                                                                    | IE ARC                                                                                    | Attainment Status      | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|-------------------------------------------|---------------------------|-------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|------------------------|------------------------------------|----------------------------------|
| Hotline Clamps<br>8.1.4.5<br>WMP.464      | 250 hotline clamps        | Met<br><br>Target: 250 hotline clamps<br><br>Actual: 678 hotline clamps                   | Met<br><br>Target: 250 hotline clamps<br><br>Actual: 678 hotline clamps                   | Met<br><br>Target: 250 hotline clamps<br><br>Actual: 678 hotline clamps                   | Met <sup>156</sup>     | \$1,702                            | \$802                            |
| Lightning Arrestors<br>8.1.4.6<br>WMP.550 | 1,848 lightning arrestors | Not met<br><br>Target: 1,848 lightning arrestors<br><br>Actual: 1,654 lightning arrestors | Not met<br><br>Target: 1,848 lightning arrestors<br><br>Actual: 1,654 lightning arrestors | Not met<br><br>Target: 1,848 lightning arrestors<br><br>Actual: 1,654 lightning arrestors | Not met <sup>157</sup> | \$2,983                            | \$2,719                          |

<sup>156</sup> Although SDG&E met its target for the hotline clamp program initiative, spatial data reported to Energy Safety reports actual completion of 661 units replaced as opposed to 678 units reported in the other annual reporting sources for this initiative (Section 6.3, Table 3).

<sup>157</sup> Energy Safety's field audit of WMP.550 identified 1,485 reliable data points, as opposed to 1,654 lighting arrestors recorded in other annual reporting sources (Section 6.3, Table 3).

| 2024 WMP Initiative Activity                                     | 2024 WMP Activity Target                         | QDR                                                    | EC ARC                                                   | IE ARC                                                              | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|------------------------------------------------------------------|--------------------------------------------------|--------------------------------------------------------|----------------------------------------------------------|---------------------------------------------------------------------|-------------------|------------------------------------|----------------------------------|
| QA/QC – Transmission Inspection<br>8.1.6<br>WMP.1191             | 100% of conditions identified during inspection  | Met<br>Target: 100% findings<br>Actual: 100% findings  | Met<br>Target: 100% findings<br>Actual: 100% findings    | Met<br>Target: 100% internal audits<br>Actual: 100% internal audits | Met               | \$0                                | \$0 <sup>158</sup>               |
| QA/QC of Distribution Detailed Inspections<br>8.1.6.2<br>WMP.491 | 0.5%-1.5% of completed inspections per inspector | Met<br>Target: 77 structures<br>Actual: 440 structures | Met<br>Target: 77 inspections<br>Actual: 440 inspections | Met<br>Target: 77 structures<br>Actual: 440 structures              | Met               | \$0                                | \$0 <sup>159</sup>               |

<sup>158</sup> EC ARC, page 45. SDG&E noted that expenditures for this program were FERC-funded and are not reported in the WMP.

<sup>159</sup> EC ARC, page 45. SDG&E noted that expenditures for this program were embedded within Detailed Distribution Inspections (WMP.478).

| 2024 WMP Initiative Activity                                   | 2024 WMP Activity Target | QDR                                                                      | EC ARC                                                                     | IE ARC                                                                     | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|----------------------------------------------------------------|--------------------------|--------------------------------------------------------------------------|----------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------|------------------------------------|----------------------------------|
| QA/QC of Distribution Drone Assessments<br>8.1.6.3<br>WMP.1192 | 100%                     | Not met<br><br>Target: 13,500 structures<br><br>Actual: 6,529 structures | Not met<br><br>Target: 13,500 Inspections<br><br>Actual: 6,529 Inspections | Not met<br><br>Target: 13,500 Inspections<br><br>Actual: 6,529 Inspections | Not met           | \$0                                | \$0 <sup>160</sup>               |
| QA/QC – Transmission Inspection<br>8.1.6<br>WMP.1194           | 18 inspections           | Met<br><br>Target: 18 structures<br><br>Actual: 22 structures            | Met<br><br>Target: 18 inspections<br><br>Actual: 22 inspections            | Met<br><br>Target: 18 inspections<br><br>Actual: 22 inspections            | Met               | \$0                                | \$0 <sup>161</sup>               |

<sup>160</sup> EC ARC, page 45. SDG&E noted that expenditures for this program were embedded within Distribution Drone Assessments (WMP.552).

<sup>161</sup> EC ARC, page 46. SDG&E noted that expenditures for this program were FERC-funded and are not reported in the WMP.

| 2024 WMP Initiative Activity              | 2024 WMP Activity Target        | QDR                                                                                               | EC ARC                                                                                            | IE ARC                                                                                            | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|-------------------------------------------|---------------------------------|---------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|-------------------|------------------------------------|----------------------------------|
| Detailed Inspection<br>8.2.2.1<br>WMP.494 | 485,400 inspections             | Met<br><br>Target: 485,400 inspections<br><br>Actual: 523,949 inspections                         | Met<br><br>Target: 485,400 inspections<br><br>Actual: 523,949 inspections                         | Met<br><br>Target: 485,400 inspections<br><br>Actual: 523,949 inspections                         | Met               | \$60,084                           | \$76,305                         |
| Off-Cycle Patrol<br>8.2.2.2<br>WMP.508    | 106 Vegetation Management Areas | Met<br><br>Target: 106 Vegetation Management Areas<br><br>Actual: 106 Vegetation Management Areas | Met<br><br>Target: 106 Vegetation Management Areas<br><br>Actual: 106 Vegetation Management Areas | Met<br><br>Target: 106 Vegetation Management Areas<br><br>Actual: 106 Vegetation Management Areas | Met               | \$0                                | \$0 <sup>162</sup>               |

<sup>162</sup> EC ARC, page 45. SDG&E noted that expenditures for this program were embedded within Detailed Inspections (WMP.494).

| 2024 WMP Initiative Activity         | 2024 WMP Activity Target | QDR                                                         | EC ARC                                                      | IE ARC                                                      | Attainment Status  | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|--------------------------------------|--------------------------|-------------------------------------------------------------|-------------------------------------------------------------|-------------------------------------------------------------|--------------------|------------------------------------|----------------------------------|
| Fuels Management<br>8.2.3<br>WMP.497 | 500 poles                | Not met<br><br>Target: 500 poles<br><br>Actual: 147 poles   | Not met<br><br>Target: 500 poles<br><br>Actual: 147 poles   | Not met<br><br>Target: 500 poles<br><br>Actual: 147 poles   | Not met            | \$5,833                            | \$3,159                          |
| Pole Clearing<br>8.2.3.1<br>WMP.512  | 33,010 poles             | Met<br><br>Target: 33,010 poles<br><br>Actual: 36,500 poles | Met<br><br>Target: 33,010 poles<br><br>Actual: 36,500 poles | Met<br><br>Target: 33,010 poles<br><br>Actual: 36,500 poles | Met <sup>163</sup> | \$7,893                            | \$7,097                          |

<sup>163</sup> Although SDG&E met the target for its pole clearing initiative, Energy Safety's inspection findings and analysis note a reliable actual accounting of 36,062 poles as opposed to 36,500 poles (section 6.3, Table 3).

| 2024 WMP Initiative Activity             | 2024 WMP Activity Target                                                                                                                                 | QDR                                                            | EC ARC                                                         | IE ARC                                                         | Attainment Status  | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|----------------------------------------------------------------|----------------------------------------------------------------|--------------------|------------------------------------|----------------------------------|
| Clearance<br>8.2.3.3<br>WMP.501          | 11,200 trees                                                                                                                                             | Met<br><br>Target:<br>11,200 trees<br><br>Actual: 11,788 trees | Met<br><br>Target:<br>11,200 trees<br><br>Actual: 11,788 trees | Met<br><br>Target:<br>11,200 trees<br><br>Actual: 11,788 trees | Met                | \$10,235                           | \$0                              |
| Fall-In Mitigation<br>8.2.3.4<br>WMP.494 | Identification and removal or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment. | Missing                                                        | Missing                                                        | Missing                                                        | Met <sup>164</sup> | \$0                                | \$0 <sup>165</sup>               |

<sup>164</sup> VMA Report, pages 10-13.

<sup>165</sup> 2024 WMP, page 277. SDG&E noted that this program is part of Detailed Inspections (WMP.494).

| 2024 WMP Initiative Activity                      | 2024 WMP Activity Target                                                                       | QDR     | EC ARC  | IE ARC  | Attainment Status      | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|---------------------------------------------------|------------------------------------------------------------------------------------------------|---------|---------|---------|------------------------|------------------------------------|----------------------------------|
| Substation Defensible Space<br>8.2.3.5<br>WMP.492 | Reduce ignition probability and wildfire consequence due to contact with substation equipment. | Missing | Missing | Missing | Not met <sup>166</sup> | \$0                                | \$0 <sup>167</sup>               |

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<sup>166</sup> VMA Report, pages 13-17.

<sup>167</sup> EC ARC, page 45. SDG&E noted that expenditures for this program were FERC-funded and are not reported in the WMP.

| 2024 WMP Initiative Activity                                                    | 2024 WMP Activity Target                                                                                                                                           | QDR     | EC ARC  | IE ARC  | Attainment Status  | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|---------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------|---------|--------------------|------------------------------------|----------------------------------|
| High-Risk Species- “Right Tree, Right Place” initiative<br>8.2.3.6<br>WMP .1325 | Provide customer incentives to remove incompatible trees growing near power lines and continues to provide replacement trees compatible to plant near power lines. | Missing | Missing | Missing | Met <sup>168</sup> | \$1,000                            | \$922                            |

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<sup>168</sup> VMA Report, page A-8.

| 2024 WMP Initiative Activity                                            | 2024 WMP Activity Target                                                    | QDR     | EC ARC  | IE ARC  | Attainment Status  | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|-------------------------------------------------------------------------|-----------------------------------------------------------------------------|---------|---------|---------|--------------------|------------------------------------|----------------------------------|
| High Risk Species-Community Tree Rebate Program<br>8.2.3.6<br>WMP .1326 | Offer underserved communities a rebate on the purchase of up to five trees. | Missing | Missing | Missing | Met <sup>169</sup> | \$0                                | \$0 <sup>170</sup>               |

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<sup>169</sup> VMA Report, page A-8.

<sup>170</sup> No proposed and actual expenditure was reported for this initiative.

| 2024 WMP Initiative Activity                                              | 2024 WMP Activity Target                                                                                                                         | QDR     | EC ARC  | IE ARC  | Attainment Status  | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|---------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------|---------|--------------------|------------------------------------|----------------------------------|
| Fire Resilient Right-of-Ways-Vegetation Abatement<br>8.2.3.7<br>WMP .1327 | Reduce the fuel loading from overgrown vegetation that may propagate a fire if an ignition on SDG&E-owned properties and right-of-way corridors. | Missing | Missing | Missing | Met <sup>171</sup> | \$0                                | \$0 <sup>172</sup>               |

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<sup>171</sup> VMA Report, pages A-8.

<sup>172</sup> No proposed and actual expenditure was reported for this initiative.

| 2024 WMP Initiative Activity                                                                      | 2024 WMP Activity Target                                                                                                                                      | QDR     | EC ARC  | IE ARC  | Attainment Status  | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|---------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------|---------|--------------------|------------------------------------|----------------------------------|
| Fire Resilient Right-of-Ways-Fire Coordination Fuels Reduction MOU & Grant<br>8.2.3.7<br>WMP.1328 | Provide grants to external partners for the purpose of reducing fuels near electrical infrastructure and to enhance community wildfire prevention and safety. | Missing | Missing | Missing | Met <sup>173</sup> | \$0                                | \$0 <sup>174</sup>               |

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<sup>173</sup> VMA Report, pages A-8.

<sup>174</sup> No proposed and actual expenditure was reported for this initiative.

| 2024 WMP Initiative Activity                                   | 2024 WMP Activity Target                                                                                                                                                             | QDR     | EC ARC  | IE ARC  | Attainment Status  | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------|---------|--------------------|------------------------------------|----------------------------------|
| Emergency Response Vegetation Management<br>8.2.3.8<br>WMP.496 | Plan and execute vegetation activities in response to emergency situations including weather conditions that indicate an elevated fire threat and post-wildfire service restoration. | Missing | Missing | Missing | Met <sup>175</sup> | \$0                                | \$0 <sup>176</sup>               |

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<sup>175</sup> VMA Report, pages A-33 to A-34.

<sup>176</sup> No proposed and actual expenditure was reported for this initiative.

| 2024 WMP Initiative Activity                                | 2024 WMP Activity Target                                                                                                                                                                             | QDR     | EC ARC  | IE ARC  | Attainment Status  | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|-------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------|---------|--------------------|------------------------------------|----------------------------------|
| Vegetation Management Enterprise System<br>8.2.4<br>WMP.511 | Operate and support of centralized vegetation management and inspection enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work. | Missing | Missing | Missing | Met <sup>177</sup> | \$353                              | \$488                            |

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<sup>177</sup> VMA Report, pages A-35 to A-36.

| 2024 WMP Initiative Activity                              | 2024 WMP Activity Target                                                                                                                                                                                                            | QDR     | EC ARC  | IE ARC  | Attainment Status  | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|-----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------|---------|--------------------|------------------------------------|----------------------------------|
| Quality Assurance and Quality Control<br>8.2.5<br>WMP.505 | Establish and perform the audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes. | Missing | Missing | Missing | Met <sup>178</sup> | \$0                                | \$0 <sup>179</sup>               |

<sup>178</sup> VMA Report, pages 14-17.

<sup>179</sup> EC ARC, pages 49-50. SDG&E noted that expenditures for this program were embedded within Detailed Inspections (WMP.494), Off-Cycle Patrol (WMP.508) and Clearance (WMP.501).

| 2024 WMP Initiative Activity          | 2024 WMP Activity Target                                                                                                         | QDR     | EC ARC  | IE ARC  | Attainment Status      | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|---------|---------|---------|------------------------|------------------------------------|----------------------------------|
| Open Work Orders<br>8.2.6<br>WMP.1329 | Manage the electrical corporation's open work orders resulting from inspections that prescribe vegetation management activities. | Missing | Missing | Missing | Not met <sup>180</sup> | \$0                                | \$0 <sup>181</sup>               |

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<sup>180</sup> VMA Report, pages 18-20.

<sup>181</sup> No proposed and actual expenditure was reported for this initiative.

| 2024 WMP Initiative Activity           | 2024 WMP Activity Target                                                                                                                                                                                                                   | QDR     | EC ARC  | IE ARC  | Attainment Status  | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------|---------|--------------------|------------------------------------|----------------------------------|
| Workforce Planning<br>8.2.7<br>WMP.506 | Ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work. | Missing | Missing | Missing | Met <sup>182</sup> | \$0                                | \$0 <sup>183</sup>               |

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<sup>182</sup> VMA Report, pages A-43 to A-45.

<sup>183</sup> No proposed and actual expenditure was reported for this initiative.

| 2024 WMP Initiative Activity                         | 2024 WMP Activity Target                                       | QDR                                                    | EC ARC                                                 | IE ARC                                                 | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|------------------------------------------------------|----------------------------------------------------------------|--------------------------------------------------------|--------------------------------------------------------|--------------------------------------------------------|-------------------|------------------------------------|----------------------------------|
| AQI Sensor – Installation<br>8.3.2.1.3<br>WMP.970    | Six sensors                                                    | Not met<br>Target: Six sensors<br>Actual: Zero sensors | Not met<br>Target: Six sensors<br>Actual: Zero sensors | Not met<br>Target: Six sensors<br>Actual: Zero sensors | Not met           | \$0                                | \$45                             |
| Air Quality Management Program<br>8.3.2.3<br>WMP.970 | Incorporate and publish AQI data via existing FSCA Application | Missing                                                | Missing                                                | Missing                                                | Not met           | \$0                                | \$0 <sup>184</sup>               |

<sup>184</sup> No proposed and actual expenditure was reported for this initiative.

| 2024 WMP Initiative Activity                  | 2024 WMP Activity Target      | QDR                                                                                                | EC ARC                                                                                             | IE ARC                                                                                             | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|-----------------------------------------------|-------------------------------|----------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|-------------------|------------------------------------|----------------------------------|
| Wireless Fault Indicators<br>8.3.3<br>WMP.449 | 300 wireless fault indicators | Not met<br><br>Target: 300 wireless fault indicators<br><br>Actual: Zero wireless fault indicators | Not met<br><br>Target: 300 wireless fault indicators<br><br>Actual: Zero wireless fault indicators | Not met<br><br>Target: 300 wireless fault indicators<br><br>Actual: Zero wireless fault indicators | Not met           | \$0                                | \$0 <sup>185</sup>               |

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<sup>185</sup> No proposed and actual expenditure was reported for this initiative.

| 2024 WMP Initiative Activity     | 2024 WMP Activity Target                                                                                                                                                    | QDR     | EC ARC                                                                                          | IE ARC  | Attainment Status  | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|-------------------------------------------------------------------------------------------------|---------|--------------------|------------------------------------|----------------------------------|
| Cameras<br>8.3.4.1.2<br>WMP.1343 | Continue hardening network and expand new sites where broader fire community benefit can be realized.<br><br>Automate smoke detection notifications leveraging AI software. | Missing | Continued upkeep through formal agreement with University of California Regents. <sup>186</sup> | Missing | Met <sup>187</sup> | \$0                                | \$0 <sup>188</sup>               |

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<sup>186</sup> EC ARC, page 16.

<sup>187</sup> Attainment status is supported by SDG&E's response to Data Request OEIS-C-GEN-2024-SDG&E-041, Questions 11–13.

<sup>188</sup> No proposed and actual expenditure was reported for this initiative.

| 2024 WMP Initiative Activity                                        | 2024 WMP Activity Target                                                                             | QDR     | EC ARC                                                                                                                                                                                    | IE ARC  | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|---------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|-------------------|------------------------------------|----------------------------------|
| Key Personnel, Qualifications, and Training<br>8.4.2.1.3<br>WMP.526 | Modernize and enhance workforce training in the areas of storm response, process, and documentation. | Missing | Summer Readiness training was conducted and training and tabletop exercises, DOC-G, and an Earthquake Exercise series were developed in collaboration with Gas Operations. <sup>189</sup> | Missing | Met               | \$0                                | \$0 <sup>190</sup>               |

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<sup>189</sup> EC ARC, page 18.

<sup>190</sup> No proposed and actual expenditure was reported for this initiative.

| 2024 WMP Initiative Activity                                                                             | 2024 WMP Activity Target                                                                                     | QDR     | EC ARC  | IE ARC  | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|----------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|---------|---------|---------|-------------------|------------------------------------|----------------------------------|
| Emergency Response Wildfire/PSPS Exercise and Training<br>WMP.526                                        | To ensure readiness, Wildfire and PSPS response teams will participate and recertify by September 1 annually | Missing | Missing | Missing | Not met           | \$0                                | \$0 <sup>191</sup>               |
| CEADPP updated per changes in procedures, conditions, law, or Commission policy<br>8.4.2.1.1<br>WMP.1008 | Submit CEADPP updates as part of the annual report required by Standard 11 by December 30                    | Missing | Missing | Missing | Not met           | \$18,306                           | \$21,738                         |

<sup>191</sup> No proposed and actual expenditure was reported for this initiative.

| 2024 WMP Initiative Activity                | 2024 WMP Activity Target                                                                                | QDR     | EC ARC                                                                                               | IE ARC  | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|---------------------------------------------|---------------------------------------------------------------------------------------------------------|---------|------------------------------------------------------------------------------------------------------|---------|-------------------|------------------------------------|----------------------------------|
| Emergency Planning<br>8.4.2.1.1<br>WMP.1335 | Add one new state-of-the-art Tactical Mobile Command Trailer to the emergency fleet                     | Missing | The project had been paused to reevaluate funding and will be re-visited in 2026. <sup>192</sup>     | Missing | Not met           | \$0                                | \$0 <sup>193</sup>               |
| Emergency Planning<br>8.4.3.1<br>WMP.1335   | Continue engaging Human Engineering to develop a dashboard and workflow for wildfire/PSPS notifications | Missing | Development of a dashboard and workflow for wildfire and PSPS notifications continued <sup>194</sup> | Missing | Met               | \$0                                | \$0 <sup>195</sup>               |

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<sup>192</sup> EC ARC, page 19.

<sup>193</sup> No proposed and actual expenditure was reported for this initiative.

<sup>194</sup> EC ARC, page 19.

<sup>195</sup> No proposed and actual expenditure was reported for this initiative.

| 2024 WMP Initiative Activity                                             | 2024 WMP Activity Target                                                                                                                                  | QDR     | EC ARC                                                                                                                                                   | IE ARC  | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|--------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------|-------------------|------------------------------------|----------------------------------|
| Communication Strategy with Public Safety Partners<br>8.4.3.2<br>WMP.527 | Enhance collaboration and engagement with public safety partners and the community through the use of the new Wildfire & Climate Resiliency Center (WCRC) | Missing | The WCRC improved workforce training and fostered community engagement to develop a more inclusive and effective climate resilience plan. <sup>196</sup> | Missing | Met               | \$3,887                            | \$3,958                          |

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<sup>196</sup> EC ARC, page 20.

| 2024 WMP Initiative Activity                             | 2024 WMP Activity Target                                                                                                   | QDR     | EC ARC                                                                                                                                                                                  | IE ARC  | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|-------------------|------------------------------------|----------------------------------|
| Customer Feedback Outreach Surveys<br>8.5.2.4<br>WMP.532 | Continue soliciting largescale customer and stakeholder feedback at least twice annually to incorporate into future plans. | Missing | Outreach continued utilizing partnerships with Community Based Organizations located in the HFTD or serving individuals with AFN to amplify PSPS and wildfire messaging. <sup>197</sup> | Missing | Met               | \$0                                | \$0 <sup>198</sup>               |

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<sup>197</sup> EC ARC, page 20.

<sup>198</sup> No proposed and actual expenditure was reported for this initiative.

| 2024 WMP Initiative Activity                                    | 2024 WMP Activity Target                                                                                        | QDR                                           | EC ARC                                        | IE ARC                                        | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------|-----------------------------------------------|-------------------|------------------------------------|----------------------------------|
| PSPS Stakeholder Education and Awareness<br>8.5.2.4<br>WMP.1337 | One Functional Exercise                                                                                         | Not met<br>Target: Missing<br>Actual: Missing | Not met<br>Target: Missing<br>Actual: Missing | Not met<br>Target: Missing<br>Actual: Missing | Not met           | \$622                              | \$450                            |
| FPI<br>8.3.3.3<br>WMP.450                                       | Integrate FPI into the Outage Management System for future protective equipment threshold setting improvement . | Missing                                       | Missing                                       | Missing                                       | Not met           | \$5,916                            | \$5,646                          |

| 2024 WMP Initiative Activity               | 2024 WMP Activity Target                 | QDR                       | EC ARC  | IE ARC  | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|--------------------------------------------|------------------------------------------|---------------------------|---------|---------|-------------------|------------------------------------|----------------------------------|
| Number of Customers Impacted<br>WMP.1352   | 47,857 customers impacted <sup>199</sup> | 53,190 customers impacted | Missing | Missing | Not met           | \$0                                | \$0 <sup>200</sup>               |
| Number of Circuits Deenergized<br>WMP.1353 | 55.49 circuits <sup>201</sup>            | 72 circuit events         | Missing | Missing | Not met           | \$0                                | \$0 <sup>202</sup>               |

<sup>199</sup> 2024 WMP, page 415. SDG&E noted performing mitigation plans to reduce the scale, scope, and frequency of PSPS events.

<sup>200</sup> No proposed and actual expenditure was reported for this initiative.

<sup>201</sup> 2024 WMP, page 415. SDG&E noted performing mitigation plans to reduce the scale, scope, and frequency of PSPS events.

<sup>202</sup> No proposed and actual expenditure was reported for this initiative.

| 2024 WMP Initiative Activity      | 2024 WMP Activity Target   | QDR         | EC ARC  | IE ARC  | Attainment Status | Proposed Expenditure (\$ thousand) | Actual Expenditure (\$ thousand) |
|-----------------------------------|----------------------------|-------------|---------|---------|-------------------|------------------------------------|----------------------------------|
| Number of PSPS Events<br>WMP.1354 | 3.53 events <sup>203</sup> | Four events | Missing | Missing | Not met           | \$0                                | \$0 <sup>204</sup>               |

<sup>203</sup> 2024 WMP, page 415. SDG&E noted performing mitigation plans to reduce the scale, scope, and frequency of PSPS events.

<sup>204</sup> No proposed and actual expenditure was reported for this initiative.

## Appendix B: SDG&E Vegetation Management Audit Report

On February 26, 2026, Energy Safety issued its Vegetation Management Audit (VMA) Report for SDG&E. The VM Audit Report concluded that SDG&E achieved the objective of 10 of its 13 vegetation management initiatives, and completed all work associated with 12 vegetation management utility initiative activities described in its WMP.<sup>205</sup> Energy Safety also concluded that SDG&E had outstanding deficiencies in three initiatives. The deficient initiatives are noted with an attainment status of “not met.”

The findings from Energy Safety’s VM Audit Report are detailed in Table 11.

Table 11. Energy Safety Findings from SDG&E 2024 VM Audit Report of WMP Vegetation Management Initiatives

| Vegetation Management Initiative        | Utility Initiative Activity<br>Tracking ID            | VMA Report Finding |
|-----------------------------------------|-------------------------------------------------------|--------------------|
| 8.2.2 Vegetation Management Inspections | Detailed Vegetation Management Inspections (WMP .494) | Achieved Objective |
| 8.2.2 Vegetation Management Inspections | Off-Cycle HFTD Patrol Inspections (WMP .508)          | Achieved Objective |
| 8.2.3.1 Pole Clearing                   | Pole Clearing (WMP .512)                              | Achieved Objective |
| 8.2.3.2 Wood and Slash Management       | Fuels Management (WMP .497)                           | Deficient          |
| 8.2.3.3 Clearance                       | Enhanced Clearance (WMP .501)                         | Achieved Objective |
| 8.2.3.4 Fall-In Mitigation              | Fall-In Mitigation (WMP .494)                         | Achieved Objective |
| 8.2.3.5 Substation Defensible Space     | Substation Patrol Inspections (WMP.492)               | Deficient          |
| 8.2.3.6 High-Risk Species               | “Right Tree, Right Place” initiative (WMP .1325)      | Achieved Objective |

<sup>205</sup> Although SDG&E’s 2024 WMP contained 13 vegetation management initiatives, Energy Safety assessed performance to a total of 16 vegetation management targets and commitments. Of these 16, 13 had Utility Initiative Tracking IDs. Two initiatives did not have Utility Tracking IDs; Targeted Species Patrols and Open Work Orders.

| Vegetation Management Initiative                 | Utility Initiative Activity<br>Tracking ID                                     | VMA Report Finding |
|--------------------------------------------------|--------------------------------------------------------------------------------|--------------------|
| 8.2.3.6 High-Risk Species                        | Community Tree Rebate Program (WMP .1326)                                      | Achieved Objective |
| 8.2.3.7 Fire Resilient Right-of-Ways             | Vegetation Abatement (WMP .1327)                                               | Achieved Objective |
| 8.2.3.7 Fire Resilient Right-of-Ways             | Fire Coordination Fuels Reduction MOU & Grant (WMP.1328)                       | Achieved Objective |
| 8.2.3.8 Emergency Response Vegetation Management | Hazard Tree Assessment After Fires (WMP. 496)                                  | Achieved Objective |
| 8.2.4. Vegetation Management Enterprise System   | Vegetation Management Enterprise System upgrades and implementation (WMP .511) | Achieved Objective |
| 8.2.5. Quality Assurance and Quality Control     | QA/QC audit activities (WMP .505)                                              | Achieved Objective |
| 8.2.6 Open Work Orders                           | Open Work Orders (WMP.1329)                                                    | Deficient          |
| 8.2.7 Workforce Planning                         | Workforce qualifications and training (WMP .506)                               | Achieved Objective |

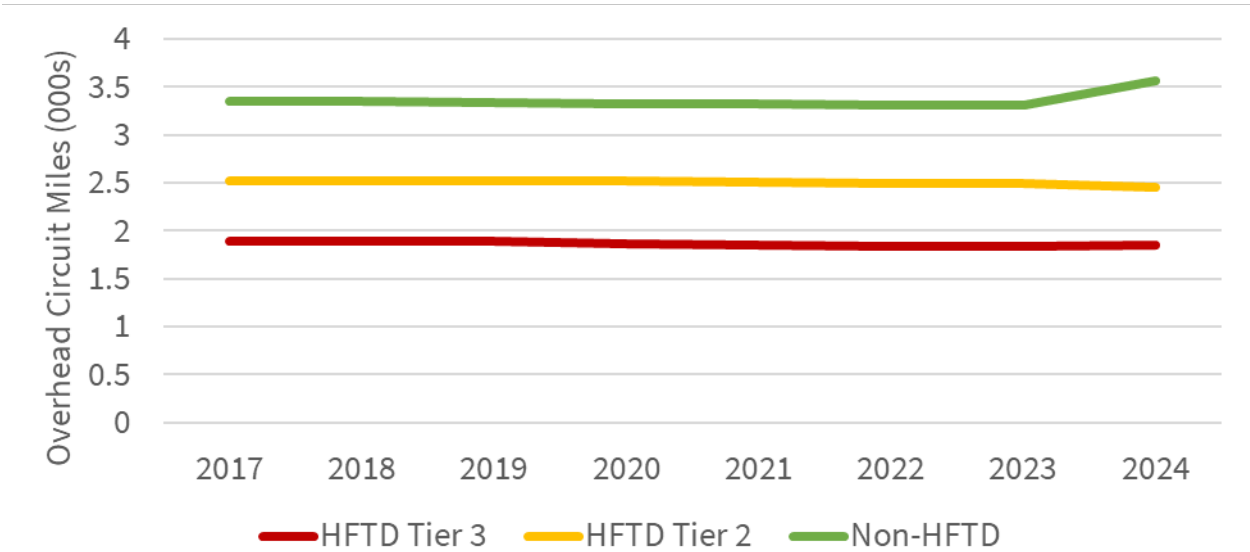
## Appendix C: Normalizing Metrics and Raw Count Data

Data for this appendix comes from the QDRs and the DR-280 Response, as reported by SDG&E.<sup>206</sup> Overhead circuit miles are used to estimate rates for ignition risk metrics. Raw counts of ignition risk metrics are also presented in this appendix.

### Overhead Circuit Miles

The number of overhead circuit miles (OCM) has generally stayed the same between 2017 and 2024 (Figure 20).

Figure 20. SDG&E Overhead Circuit Miles (2017-2024) by HFTD Tier

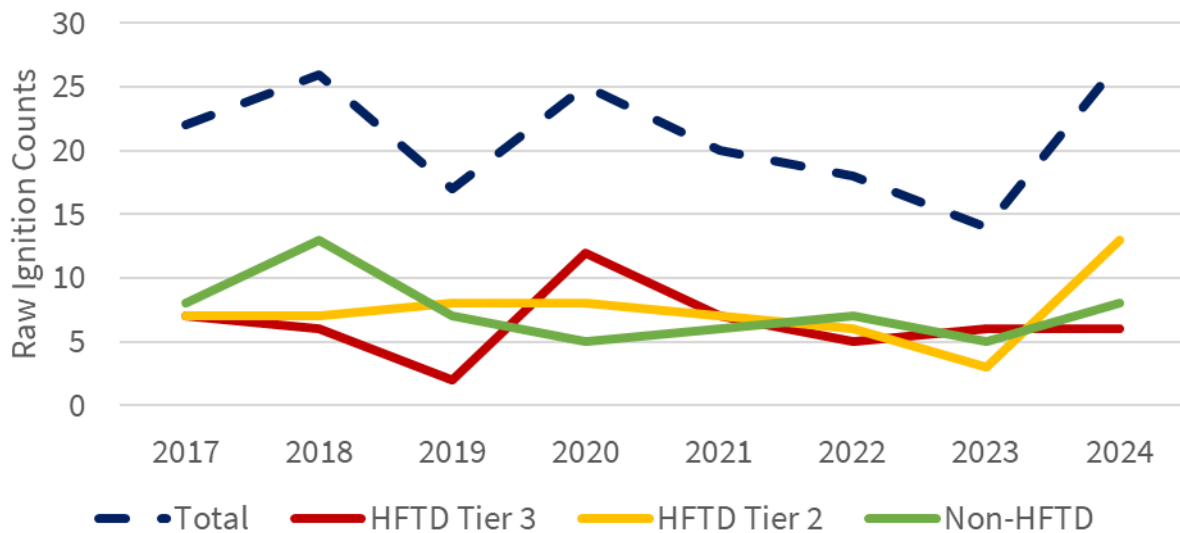


### Raw Ignition Event Counts

SDG&E’s ignition events per HFTD Tier fluctuated between 2017 and 2024 (Figure 21).

<sup>206</sup> 2022 Q3 QDR, 2023 Q4 QDR, 2024 Q4 QDR, and DR-280 Response.

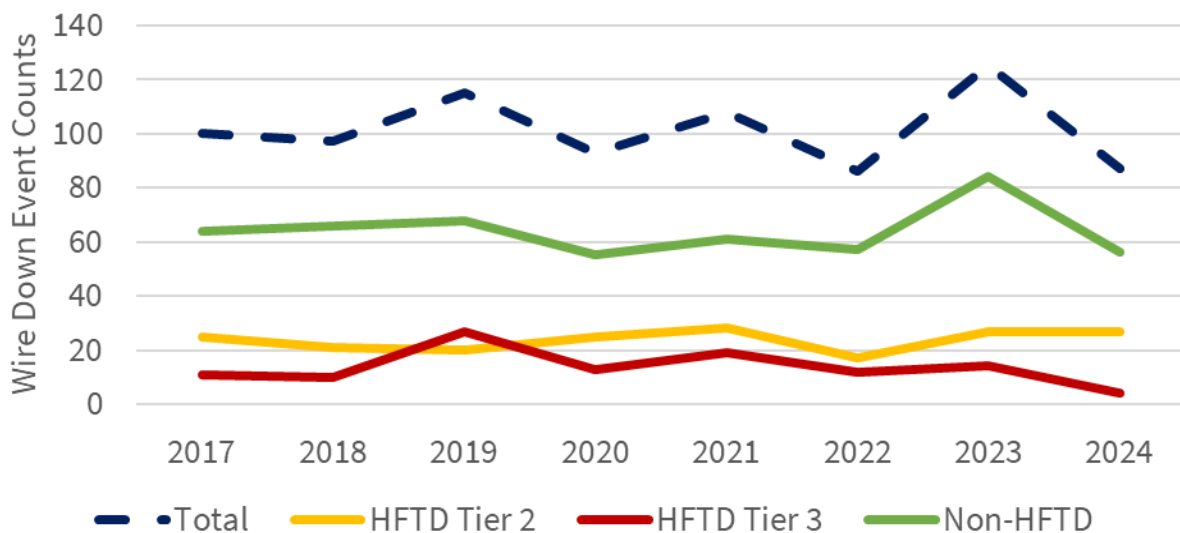
Figure 21. SDG&amp;E Ignition Event Counts (2017-2024) by HFTD Tier



### Raw Wire Down Event Counts

SDG&E's wire down event counts were generally stable between 2017 and 2022, before increasing in 2023 and decreasing in 2024. Non-HFTD wire down events occurred more frequently than HFTD Tier 2 and HFTD Tier 3 wire down events between 2017 and 2024 (Figure 22).

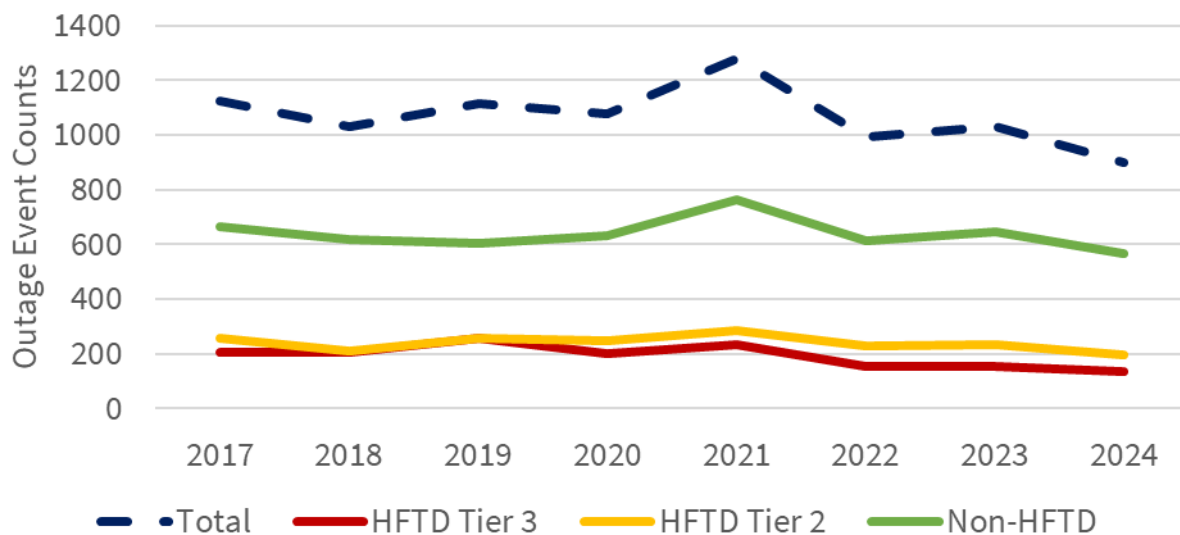
Figure 22. SDG&amp;E Wire Down Event Counts (2017-2024) by HFTD Tier



### Raw Outage Event Counts

SDG&E's outage event counts were generally stable between 2017 and 2020, before increasing in 2021. Non-HFTD outage events occurred more frequently than HFTD Tier 2 and HFTD Tier 3 outage events between 2017 and 2024 (Figure 23).

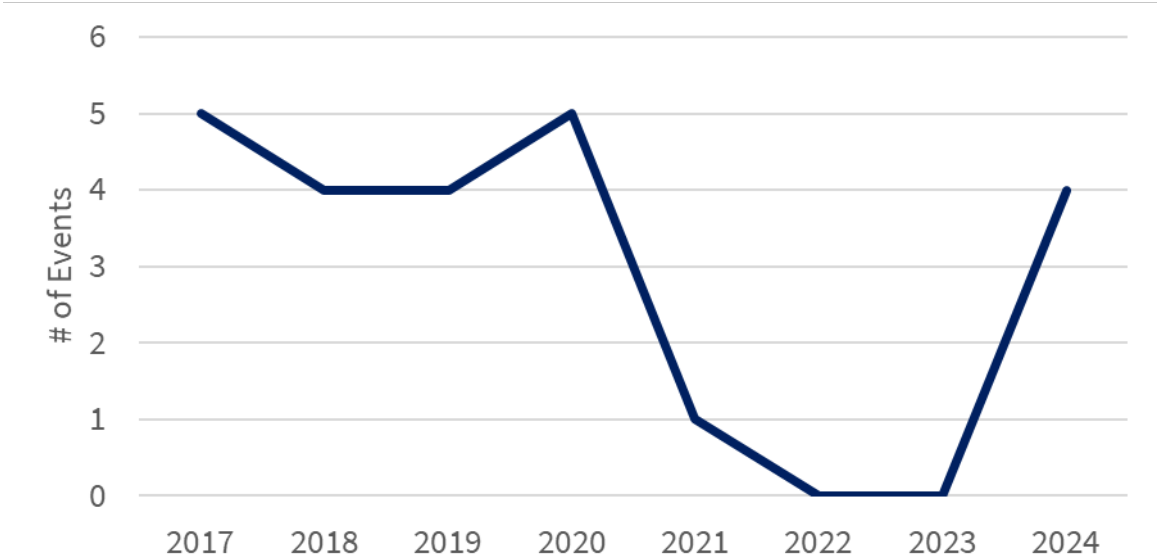
Figure 23. SDG&E Outage Event Counts (2017-2024) by HFTD Tier



Frequency of PSPS Events

The number of PSPS events on SDG&E’s system increased in 2024 from zero in 2022 and 2023 (Figure 24).

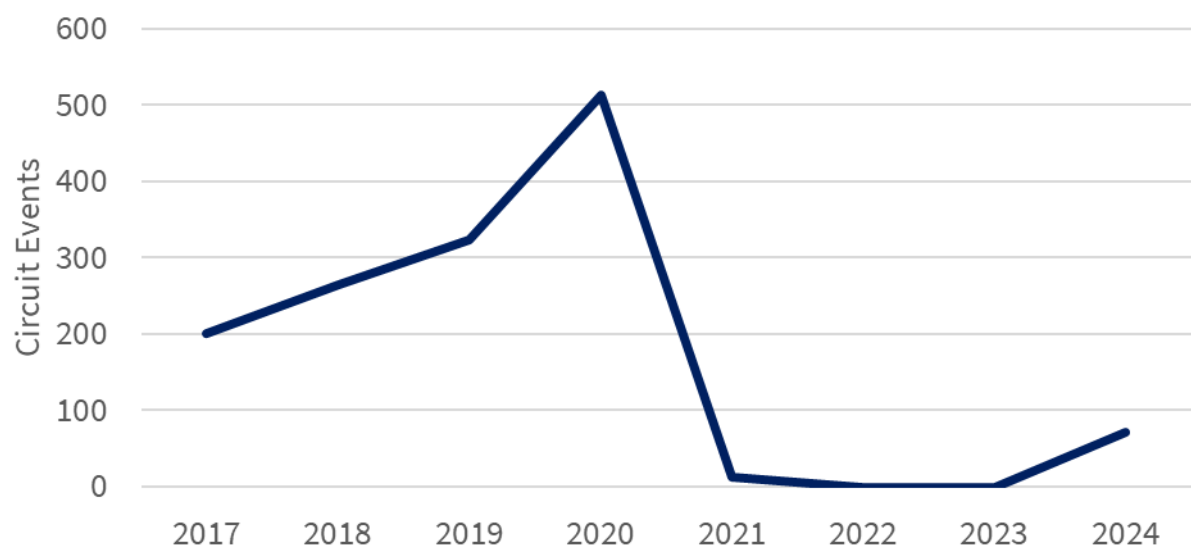
Figure 24. SDG&E PSPS Events Frequency (2017-2024)



Scope of PSPS Events

The number of utility circuits impacted by PSPS events sharply decreased in 2021 to zero in 2022 and 2023 before exhibiting a moderate increase in 2024 (Figure 25).

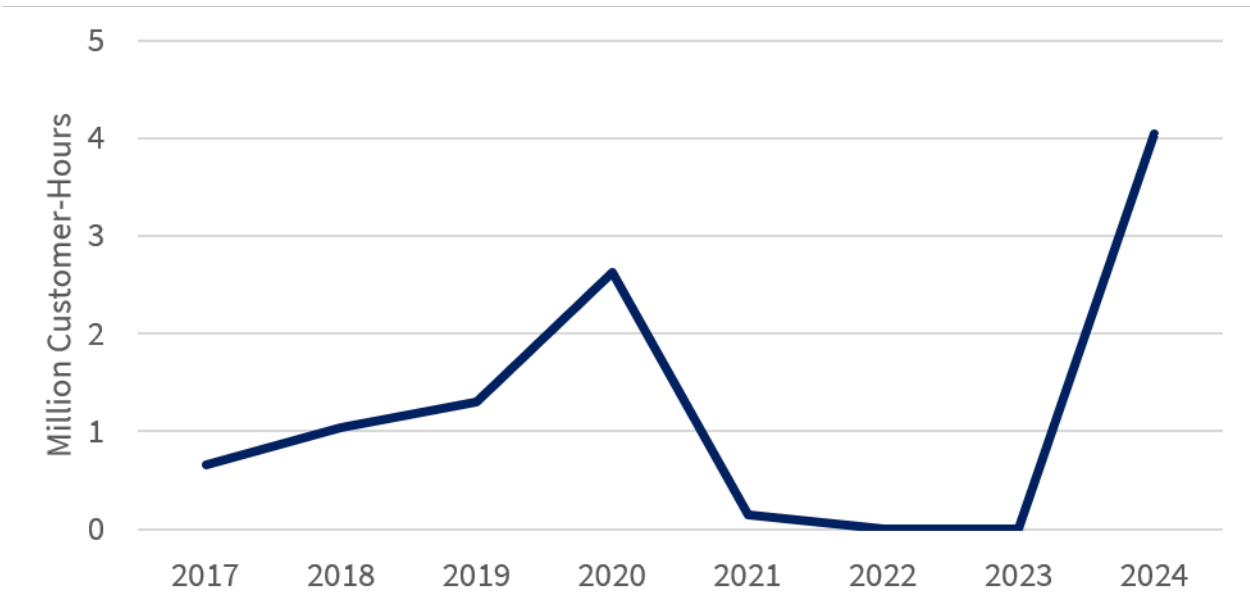
Figure 25. SDG&E PSPS Event Scope (2017-2024)



Duration – Customers of PSPS Events

The total number of customer hours impacted by all PSPS events increased to its highest point in 2024 after dropping to zero in 2022 and 2023 (Figure 26).

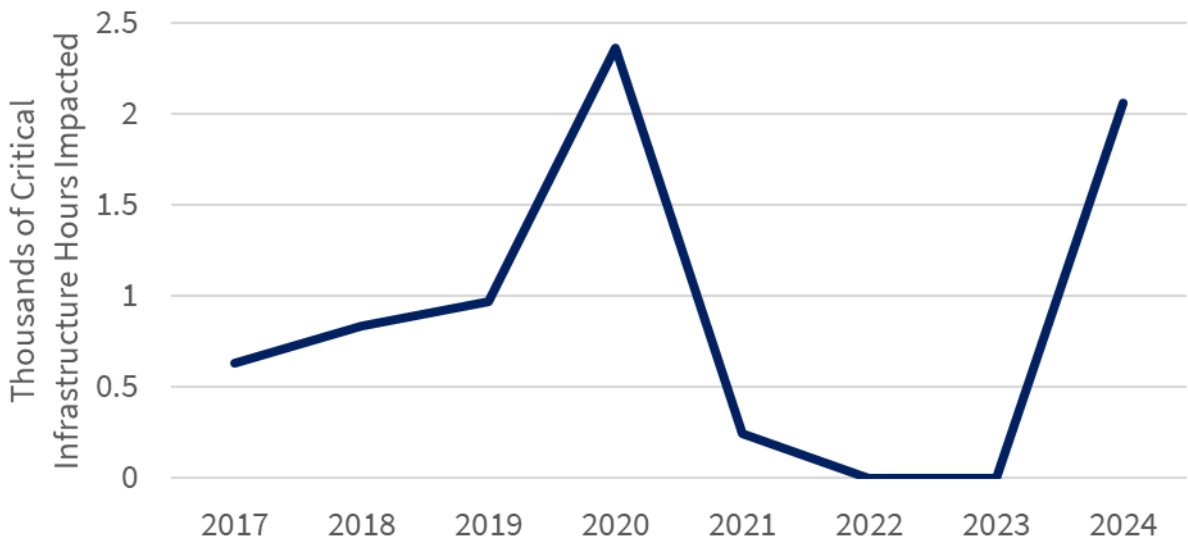
Figure 26. SDG&E PSPS Event Duration-Customers (2017-2024)



Duration – Critical Infrastructure of PSPS Events

PSPS event impacts on critical infrastructure, similar to PSPS event impacts on customers, reached its peak in 2020 then subsequently decreased thereafter with zero events in 2022 and 2023 before sharply increasing in 2024 (Figure 27).

Figure 27. SDG&E PSPS Event Duration on Critical Infrastructure (2017-2024)



Impacts of PSPS Events

The impacts of PSPS events on customers reached its peak in 2020 then subsequently decreased thereafter with zero events in 2022 and 2023 before increasing in 2024.

Figure 28. SDG&E PSPS Event Impacts (2017-2024)

