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Docket # 2024-APR

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RE: SDG&E Response to the Office of Energy Infrastructure Safety's Annual Performance Report for SDG&E's 2024 Wildfire Mitigation Plan

San Diego Gas & Electric ("SDG&E") submits this response to the Office of Energy Infrastructure Safety's ("Energy Safety") Annual Performance Report ("APR") for SDG&E's 2024 Wildfire Mitigation Plan ("WMP"), released on September 16, 2026.

I. Introduction

SDG&E shares Energy Safety's commitment to reducing utility-related wildfire risk in California. SDG&E has carefully evaluated the APR's observations and recognizes opportunities to strengthen execution, forecasting, target-setting, and performance tracking. At the same time, certain conclusions in the APR are inaccurate or do not fully reflect the applicable initiative requirements or information SDG&E previously provided to Energy Safety. Correcting these identified issues would increase SDG&E's overall WMP compliance to approximately 40 out of 59 initiatives, or 68%. SDG&E therefore requests targeted revisions to ensure the APR presents a complete and accurate assessment of SDG&E's 2024 WMP performance. SDG&E also provides additional context regarding initiatives for which the intended risk reduction was achieved or performance was affected by circumstances outside SDG&E's control.

The APR reflects Energy Safety's focus on its core value of utility wildfire safety, consistent with its mandate. Throughout 2024, however, SDG&E operated under significant regulatory uncertainty regarding its Test Year ("TY") 2024 General Rate Case ("GRC"). Many of SDG&E's core wildfire mitigation programs, including strategic hardening initiatives, were highly contested by intervening parties as unnecessary or unreasonable. In late 2023, SDG&E and Cal Advocates proposed a settlement of SDG&E's wildfire mitigation-related requests to the

California Public Utilities Commission (“CPUC”) that reduced the scope of certain programs through a corresponding reduction to SDG&E’s requested revenue requirement. Because the proposed settlement would affect SDG&E’s 2024 WMP initiative targets, SDG&E also submitted a Change Order to Energy Safety that generally aligned those targets with the revenue requirement reflected in the proposed settlement agreement.

The CPUC did not issue its decision in SDG&E’s TY 2024 GRC until December 2024, nearly a full year later than expected. As a result, SDG&E operated for nearly the entire year without an approved revenue requirement or certainty regarding its operating budget. Additionally, Energy Safety did not issue a decision on SDG&E’s Change Order request until May 31, 2024. SDG&E had modified several programs in alignment with the requested Change Order, and the timing of Energy Safety’s decision denying nearly all requested changes limited SDG&E’s ability to return to its original targets during the remainder of 2024.

Ultimately, the TY 2024 GRC decision significantly reduced funding for SDG&E’s wildfire mitigation programs, necessitating additional changes in 2024 and throughout the four-year GRC cycle. The GRC decision also reflected the CPUC’s increasing focus on balancing wildfire mitigation costs with affordability, indicating a shift in regulatory priorities. SDG&E recognizes that these circumstances do not change Energy Safety’s assessment of whether each individual 2024 WMP target was met. They nevertheless provide important context for understanding SDG&E’s 2024 performance and the operational decisions discussed throughout this response.

Senate Bill (“SB”) 254 may alleviate some of these timing and alignment challenges by better coordinating the WMP and GRC cycles and providing electrical corporations a mechanism to align WMP commitments with subsequent GRC decisions. SDG&E appreciates Energy Safety’s consideration of the regulatory context and uncertainty that existed in 2024, as noted at various points throughout the APR.

SDG&E’s comments and response to the APR focus on four key areas:

- Identifying inaccuracies or misstatements in Energy Safety’s assessment of SDG&E’s 2024 WMP;
- Highlighting areas where SDG&E’s failure to meet 2024 WMP targets did not result in additional risk, or where SDG&E’s performance over the WMP cycle achieved the cumulative targeted risk reduction;
- Noting areas where SDG&E did not meet targets due to circumstances outside of its control;
- Discussing initiatives that were impacted by operational constraints and GRC timing.

II. Inaccuracies and Misstatements in the APR

SDG&E requests that Energy Safety review the APR and revise the following inaccuracies and misstatements, many of which relate to qualitative objectives rather than specific initiative targets. These qualitative objectives were not necessarily addressed by SDG&E’s Independent Evaluator (“IE”), thus SDG&E appreciates the opportunity to provide additional information here. Further, SDG&E’s comments clarify certain initiatives that were cross referenced due to

Energy Safety’s WMP and reporting templates. These cross-references illustrate that SDG&E did, in fact, achieve certain objective WMP initiative targets. See Appendix A for a table summarizing SDG&E’s requested revisions to the APR findings.

A. WMP.526 – Emergency Response Wildfire/Power Safety Power Shutoff (“PSPS”) Exercise and Training

Energy Safety determined that Emergency Response to Wildfire/PSPS Exercise and Training (WMP.526) did not meet attainment.¹ However, SDG&E completed the required 2024 summer readiness training and previously provided Energy Safety with documentation demonstrating completion of the applicable annual participation and recertification requirements.

Specifically, in response to Energy Safety Data Request OEIS-C-WMP-2023-SDGE-E01 (dated April 28, 2025), SDG&E provided participant rosters, completion dates, training curricula, and after-action reports. SDG&E submitted this documentation on May 9, 2025, and its 2024 APR on Compliance likewise confirms that, “(i)n 2024, Summer Readiness training was conducted.”² The information previously provided demonstrates completion of the applicable requirement, and as such, SDG&E requests that Energy Safety revise its determination and include WMP.526 in SDG&E’s compliance score.

B. WMP.1354 – Number of PSPS Events

Energy Safety’s account of the number of PSPS events provided in the APR is factually incorrect. It appears that Energy Safety combined events from 2024 and 2025, resulting in an erroneous total of four events.³ SDG&E initiated two PSPS events in 2024, one in November and one in December, as documented in the publicly available post-event reports on SDG&E’s and Energy Safety’s websites.⁴

SDG&E further notes its concern with using the number of PSPS events as a WMP initiative target or objective because the conditions that may necessitate a PSPS, including drought, high winds, and dry vegetation, are outside of SDG&E’s control. Although system hardening and undergrounding electrical lines can reduce PSPS impacts over time, the CPUC significantly reduced funding for strategic undergrounding in SDG&E’s TY 2024 GRC, cutting SDG&E’s request for \$1.6075 billion to underground 605 miles to \$370 million to underground 140 miles.⁵ Thus, PSPS remains an important wildfire mitigation tool that SDG&E uses as a mitigation measure of last resort. The high-risk conditions present in late 2024 necessitated the two PSPS events to reduce wildfire risk. SDG&E respectfully requests that Energy Safety correct the number of 2024 events identified in the APR and recognize that the two 2024 PSPS events were

¹ Energy Safety, *2024 Annual Performance Report San Diego Gas & Electric Company* (September 2026) (“2024 APR”), Appendix A at p. 111.

² SDG&E, *2024 WMP Annual Report on Compliance* (April 1, 2025), Table 3-4 at p. 18.

³ 2024 APR, Table 4 at p. 25.

⁴ SDG&E PSPS Reports, available at: <https://www.sdge.com/public-safety-power-shutoff-psps-reports>, and CPUC PSPS Reports, available at: <https://www.cpuc.ca.gov/consumer-support/psps/utility-company-psps-reports-post-event-and-post-season>.

⁵ Decision (“D.”) 24-12-074 at pp. 472, 481.

warranted to reduce wildfire risk and that the occurrence of a PSPS event does not, standing alone, indicate deficient WMP performance.

C. WMP.492 – Substation Defensible Space

Energy Safety’s assessment that SDG&E did not achieve a separate Substation Defensible Space target is factually inaccurate.⁶ SDG&E did not establish a distinct target for Substation Defensible Space; rather, it was a required section of Energy Safety’s WMP template. Consistent with that template, SDG&E’s 2023-2025 WMP⁷ cross-references Substation Defensible Space to the Substation Patrol Inspection program (WMP.492), under Section 8.1.3.11. SDG&E completed 379 of 384 Substation Patrol Inspections in 2024, achieving a 99% completion rate that Energy Safety determined met attainment. Because SDG&E did not identify any separate initiative or target for Substation Defensible Space, SDG&E requests that Energy Safety either recognize the applicable cross-referenced initiative as complete or exclude it from the compliance calculation as a separate target.

D. WMP.970 – Air Quality Management Program

Energy Safety incorrectly determined that the Air Quality Management Program (WMP.970) did not meet attainment.⁸ The applicable target was to “incorporate and publish AQI [air quality index] data via existing FSCA app.”⁹ SDG&E incorporated and published the AQI data through the publicly available SDG&E Weather app (previously called FSCA Weather app), thereby completing the stated target. While an update of this three-year objective was not included in SDG&E’s 2024 Annual Report on Compliance, SDG&E’s 2023 Annual Report on Compliance¹⁰ reported the air quality index information became available through the app in 2023. Accordingly, SDG&E requests that Energy Safety revise its determination and include the Air Quality Management Program (WMP.970) in SDG&E’s compliance score.

E. WMP.1008 – Company Emergency and Disaster Preparedness Plan

Energy Safety determined that the Company Emergency and Disaster Preparedness Plan (“CEADPP”) (WMP.1008) did not meet attainment and was missing from SDG&E’s Quarterly Data Reports (“QDR”), EC Annual Report on Compliance (“ARC”), and IE ARC.¹¹ However, SDG&E did submit an updated CEADPP effective for calendar year 2024 as Appendix 2 of SDG&E’s 2023 General Order (“GO”) 166 Annual Report and Emergency Response Plan Compliance Report, which was submitted on April 30, 2024.¹² While the GO 166 report does not expressly state that the attached CEADPP applies to calendar year 2024, the CEADPP is a

⁶ 2024 APR, Appendix A at p. 97.

⁷ SDG&E, *2023-2025 Wildfire Mitigation Plan, (Revision 5)* (July 25, 2025) (“2023-2025 WMP”), Section 8.2.3.5 at p. 284.

⁸ 2024 APR, Appendix A at p. 107.

⁹ 2023-2025 WMP, OEIS Table 8-21 at p. 298.

¹⁰ SDG&E, *2023 WMP Annual Report on Compliance* (April 1, 2024), at p. 31.

¹¹ 2024 APR, Appendix A at p. 111.

¹² SDG&E, 2023 GO 166 Emergency Response Plan Compliance Report, (April 30, 2024), *available at*: <https://www.sdge.com/GO-166>.

forward-looking plan submitted in accordance with GO 166 requirements. Specifically, Standard 1 of GO 166 which requires utilities to “prepare an emergency and disaster preparedness plan (“plan”) setting forth anticipated responses to emergencies and major outages.”¹³ Accordingly, the CEADPP submitted with SDG&E’s 2023 GO 166 report was the operative plan for 2024 and satisfied the 2024 WMP target to “[s]ubmit CEADPP updates as part of the annual report required by Standard 11 by 12/30.”¹⁴

Accordingly, SDG&E requests that Energy Safety revise its determination and include the CEADPP (WMP.1008) in SDG&E’s compliance score.

F. WMP.1337 – PSPS Stakeholder Education and Awareness

Energy Safety’s Annual Report on Compliance indicates that the 2024 WMP initiative activity of PSPS Stakeholder Education and Awareness, with an activity target of “One Functional Exercise,” was not met.¹⁵ However, this is factually incorrect because the functional exercise was completed. As stated in SDG&E’s Annual Report on Compliance, “SDG&E conducted its largest and longest PSPS Functional Exercise in 2024, leading to both system improvements and enhanced responder readiness ahead of the 2024/2025 season.”¹⁶ Further, GO 166, Standard 3 requires the reporting of annual training using the procedures set forth in utility emergency plans. SDG&E conducted this training May 13 – 16, 2024, as reported in General Order 166 Emergency Response Plan Compliance Report for 2024, submitted on April 30, 2025.¹⁷

In Table 4 of Energy Safety’s Annual Report on Compliance, it summarizes initiatives Energy Safety considers as missed targets and indicates that the activity target is “One functional exercise.” Energy Safety then cites a quote from the IE ARC as the basis for SDG&E’s performance not meeting attainment: “The IE ARC stated that “while educational objectives were achieved, delayed survey activities resulted in a negligible overall impact on planned risk reduction efforts.””¹⁸ This statement conflates the PSPS Functional Exercise with the Resiliency Survey, which was a component of a separate activity under WMP.1337 that did not have a specific metric. Accordingly, SDG&E respectfully requests that Energy Safety revise its determination and update SDG&E’s compliance score to include attainment of this initiative.

G. WMP.1192 – QA/QC of Distribution Drone Assessments

Energy Safety determined that QA/QC of Distribution Drone Assessments (WMP.1192) did not meet attainment because SDG&E completed 6,529 of the 13,500 pole assessments targeted under the separate Distribution Drone Assessments (WMP.552) initiative.¹⁹ This determination

¹³ CPUC, General Order 166, Standard 1 at p. 5, available at: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/safety-policy-division/reports/general-order-no-166.pdf>

¹⁴ 2023-2025 WMP, OEIS Table 8-35 at p. 346.

¹⁵ 2024 APR, Appendix A at p. 115.

¹⁶ SDG&E, *2024 WMP Annual Report on Compliance* (April 1, 2025) at p.6.

¹⁷ GO 166 Emergency Response Plan Compliance Report (April 30, 2024), Standard 3 at p. 14, available at: <https://www.sdge.com/GO-166>.

¹⁸ 2024 APR, Table 4 at p. 24.

¹⁹ *Id.*, Appendix A at p. 93.

conflates two distinct targets. WMP.552 measures the number of poles assessed, while WMP.1192 measures whether all completed assessments received the required quality review.

WMP.1192 required SDG&E to quality-check “100 percent of assessments and images processed through the machine learning models in production.”²⁰ SDG&E completed 6,529 assessments and quality-checked all 6,529, thereby completing QA/QC for 100% of work subject to review. Applying the 13,500 pole assessment target from WMP.552 to both initiatives would, in essence, result in double counting incomplete drone assessments. Accordingly, SDG&E requests Energy Safety find that the applicable target was met, and revise its determination to include WMP.1192 in SDG&E’s compliance score.

H. Comparison of Spatial and Tabular QDR Data Inaccuracies

Energy Safety’s summary in Table 7 of the APR²¹ contains several factual inaccuracies regarding its comparison of SDG&E’s spatial and tabular data. In particular, the summary incorrectly suggests that SDG&E’s spatial and tabular submissions do not correlate.

SDG&E’s review identified several instances in which the Spatial Quarterly Data Reports (“QDR”) values reported in Table 7 do not align with the data SDG&E submitted in its QDRs. Many of the reported spatial actuals in Table 7 appear to have been calculated using a methodology that differs from the requirements in the applicable Energy Safety Data Guidelines. When the submitted records are evaluated using the fields and methodology prescribed in the Guidelines, the spatial and tabular data reconcile. Accordingly, the discrepancies identified for several initiatives reflect differences in methodology, rather than inconsistencies in SDG&E’s underlying data. See Appendix B for a detailed comparative analysis.

III. Initiatives that Achieved Full Risk Reduction, Despite Missed 2024 Targets

SDG&E acknowledges that the initiatives discussed in this section did not meet their 2024 targets, however, consideration of work performed earlier in the WMP cycle demonstrates they nonetheless achieved the cumulative work or intended risk reduction contemplated through 2024. SDG&E provides this information as important context for Energy Safety’s assessment of overall WMP performance.

A. WMP.481 – Distribution Infrared Inspections

SDG&E acknowledges that 6,398 of the targeted 9,532 inspections of Distribution Infrared Inspections were completed in 2024, representing 67 percent attainment.²² Although annual targets are evaluated independently, consideration of performance across 2023 and 2024 provides important context regarding the work completed. SDG&E achieved 124 percent attainment in 2023,²³ yielding a combined performance for the first two years of the base plan at 96 percent.

²⁰ 2023-2025 WMP, Section 8.1.6.3 at p. 235.

²¹ 2024 APR, Table 7 at pp. 66-68.

²² *Id.*, Appendix A at p. 87.

²³ SDG&E, *2023 WMP Annual Report on Compliance* (April 1, 2024), Appendix A at p. 2.

B. WMP.543 – Transmission Overhead Hardening

Energy Safety’s acknowledgement of the completion of 9.08 miles of the targeted 10.2 miles of Transmission Overhead Hardening in 2024 represents 89 percent attainment.²⁴ Although annual targets are evaluated independently, consideration of performance across 2023 and 2024 provides important context regarding the work completed. SDG&E achieved 114 percent attainment in 2023,²⁵ yielding a combined performance for the first two years of the base plan at 104 percent.

C. WMP.550 – Lightning Arrestor Removal and Replacement

Although annual targets are evaluated independently, consideration of performance across 2023 and 2024 provides important context regarding the work completed. SDG&E achieved 120 percent attainment in 2023,²⁶ yielding a combined performance for the two years at 105 percent.

D. WMP.462 – Microgrids

While the intended target of four microgrids for 2024 included the completion of battery storage and thus was not met, all four microgrids were installed and operational. As the absence of battery storage does not impact the PSPS risk reduction to customers, “(a)ll PSPS risk reduction was met in 2024 with the operation of permanent and/or temporary microgrid deployments.”²⁷ Indeed, despite finding that SDG&E did not meet this target, the APR states that “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.”²⁸

E. WMP.970 –Air Quality Sensor Installation (AQI) Activity Complete

As stated on page 7 of SDG&E’s December 19, 2023 Change Order, 16 AQI sensor installations were completed in 2022 and 2023, achieving 100% coverage of the High Fire Threat District (“HFTD”). SDG&E completed these installations ahead of schedule by installing more sensors in 2022 and 2023 than originally planned. Although Energy Safety denied SDG&E’s request to revise the 2024 target, by 2024 SDG&E had already achieved the program’s objective by achieving 100% coverage of the HFTD. Additional installations would not have expanded HFTD coverage or provided additional program benefits and would have imposed unnecessary costs on customers. SDG&E provides this information as important context for Energy Safety’s assessment of the missed 2024 target.

IV. Programs that Failed to Meet Targets Due to Circumstances Outside of SDG&E’s Control

The initiatives discussed in this section were affected by external circumstances that limited SDG&E’s ability to meet the applicable 2024 targets. These circumstances included permitting

²⁴ 2024 APR, Appendix A at p. 81.

²⁵ SDG&E, *2023 WMP Annual Report on Compliance* (April 1, 2024), Appendix A at p. 1.

²⁶ SDG&E, *2023 WMP Annual Report on Compliance* (April 1, 2024), Appendix A at p. 1.

²⁷ *Id.*, Section 5.2.6 at p. 36.

²⁸ 2024 APR, n. 119 at 37.

and property-access constraints, vendor technology limitations, customer participation, weather conditions, and other factors outside of SDG&E's control. SDG&E provides this information for Energy Safety's consideration in evaluating the circumstances surrounding the missed targets and the reasonableness of SDG&E's performance.

A. WMP.473 - Strategic Undergrounding

Of the strategic undergrounding targeted miles, 90 percent were completed, with the remaining 10 percent delayed as a result of factors outside of SDG&E's control. As stated in SDG&E's 2024 Wildfire Mitigation Plan Annual Report on Compliance, "(r)isk reduction intent was met in 2024 with substantial completion of this program," and "(f)actors impacting the ability to achieve the targeted mileage included land rights acquisition from private property owners, discretionary permitting from Caltrans and the U.S. Forest Service, and weather conditions."²⁹

B. WMP.1329 - Open Work Orders for Vegetation Management

The Annual Performance Report states that Open Work Orders (WMP.1329) did not meet attainment, treating the timeframes provided in SDG&E's WMP narrative as mandatory targets.³⁰ SDG&E's Wildfire Mitigation Plan states, "routine work is generally scheduled to be completed within 120 days of inspection, whereas priority work is generally scheduled to be completed within 30 days of inspection."³¹ The use of the term "generally" reflects that these are planning targets rather than mandatory requirements, and that completion timelines may vary based on operational and field conditions. As stated in SDG&E's 2024 Corrective Action Plan in response to the Vegetation Management Audit, "SDG&E submits that it has met both the spirit and technical statements in its WMP,"³² which provides generalized, rather than mandatory, timelines since there are several external variables that impact SDG&E's ability to complete the work. These variables include customer refusals, environmental review and restrictions, property access limitations, external agency review, permit requirements and contractor resource availability. As noted in SDG&E's Corrective Action Plan,³³ SDG&E will continue to actively work to anticipate and minimize these delays through internal planning, proactive customer engagement, coordination with contractors and external stakeholders, early permit initiation, and prioritization of urgent conditions, which are typically addressed the same day or within 24 hours of inspection.

C. WMP.449 - Wireless Fault Indicators

SDG&E acknowledges that none of the 300 targeted Wireless Fault Indicators were installed in 2024. As explained on page 39 of SDG&E's 2024 ARC, SDG&E paused the program in line with its December 19, 2023 Change Order proposing to reduce the installation target to zero.³⁴ The Change Order was prompted by manufacturer technology upgrades that introduced

²⁹ SDG&E, *2024 WMP Annual Report on Compliance* (April 1, 2025), Section 5.2.2 at p. 35.

³⁰ 2024 APR, Appendix A at p. 105.

³¹ 2023-2025 WMP, Section 8.2.6.4 at p. 292.

³² SDG&E, *SDG&E 2024 WMP Vegetation Management Audit Corrective Action Plan* (October 30, 2025), Section 8.2.6 at p. 9.

³³ *Id.* at p. 10.

³⁴ SDG&E, *2024 WMP Annual Report on Compliance* (April 1, 2025), at p.39

communication requirements incompatible with SDG&E's existing systems, a circumstances that was beyond SDG&E's control.

D. WMP.450 – Fire Potential Index

Energy Safety determined that the Fire Potential Index ("FPI") initiative (WMP.450) did not meet attainment.³⁵ The applicable activity was to "integrate FPI into Outage Management Systems (OMS) for future protective equipment threshold setting improvements."³⁶ In 2023, SDG&E deployed FPI functionality, including a forecast table and circuit map overlay, into production within its Outage Management System. Since this activity was completed in 2023, SDG&E reported its completion in the 3-Year objective update table of its 2023 ARC as follows: "In 2023, SDG&E enabled an FPI layer in its Outage Management System as a visual representation of FPI values."³⁷ SDG&E additionally noted that "[i]n 2024, automation of the FPI layer will be explored, building in rules to support operations during elevated and extreme FPI."³⁸ In line with this, SDG&E explored automation in 2024. In working with the vendor, however, it was discovered that there are technical limitations preventing the automation and thus preventing full completion of this objective.

V. Initiatives Affected by Operational Constraints, Strategic Decisions and GRC Timing

The initiatives discussed in this section were affected by operational constraints, strategic decisions, and the timing and uncertainty of SDG&E's TY 2024 GRC. These circumstances required SDG&E to adjust or pause certain activities based on anticipated funding, evolving program needs, and available resources. SDG&E provides this context for Energy Safety's consideration in evaluating the circumstances supporting the reasonableness of SDG&E's performance.

A. WMP .549 - LTE Communication Network – Distribution Communications Reliability Improvement (DCRI)

The Annual Performance Report appropriately recognized that DCRI was affected by the pending settlement agreement stating, "(i)n some cases, the missed targets described above appear reasonable."³⁹ 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."⁴⁰ As a result, the program was notably slowed down. The combined uncertainty and timing of SDG&E's Change Order, GRC settlement, and Petition to Amend resulted in significant operational challenges that prevented SDG&E from achieving this target.

³⁵ 2024 APR, Appendix A at p.115.

³⁶ 2023-2025 WMP, OEIS Table 9-3 at p. 418.

³⁷ SDG&E, *2023 WMP Annual Report on Compliance* (April 1, 2024), Table 3-6 at p. 27.

³⁸ *Id.*

³⁹ 2024 APR, Section 6.4 at 25.

⁴⁰ *Id.*

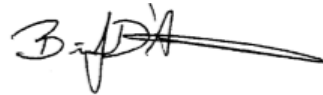
B. WMP.1335 - Emergency Planning

Energy Safety is accurate in stating that SDG&E did not purchase an additional tactical mobile command vehicle. That outcome reflects a deliberate decision to pause the program to re-evaluate funding. However, this shift in strategic direction related to one of several components of Emergency Planning (WMP.1335) does not reflect a deficiency in emergency planning or preparedness. The decision does not diminish SDG&E's operational capability or increase wildfire risk as existing tactical mobile command trailers remain fully available to support emergency response. Ultimately, as stated in SDG&E's 2025 AIR, the decision was made to not purchase an additional tactical mobile command vehicle to reprioritize available funding.⁴¹

VI. CONCLUSION

SDG&E respectfully requests that Energy Safety consider the information provided in this response, correct the identified factual and methodological errors, and revise the APR and SDG&E's compliance determination accordingly. These revisions are necessary to ensure that the APR accurately reflects SDG&E's 2024 WMP performance, including initiatives for which SDG&E satisfied the applicable requirements or achieved the intended risk reduction. SDG&E appreciates Energy Safety's continued engagement and its efforts to promote effective wildfire risk reduction and looks forward to working collaboratively to address the matters identified in this response.

Respectfully submitted,



/s/

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⁴¹ SDG&E, *2025 WMP Annual Implementation Report* (April 1, 2026), at Table 4-1 at p. 22.

Appendix A

Summary of SDG&E's Requested Revisions to the APR Findings

Table 1: Summary of SDG&E's Requested Revisions to the APR Findings

Initiative	2024 Target	SDG&E Position	Requested Revision
WMP.526 Emergency Response Wildfire/PSPS Exercise and Training	Wildfire and PSPS response teams participate and re- certify annually by Sept 1	Required training and recertification were completed and documented	Revise to met
WMP.1354 Number of PSPS Events	3.53 events	SDG&E conducted two PSPS events in 2024; the APR appears to include 2025 events	Correct event count and attainment determination
WMP.492 Substation Defensible Space	Reduce ignition probability and wildfire consequence due to contact with substation equipment	No separate target existed; the cross- referenced inspection program achieved 99% completion	Revise to met or remove separate target
WMP.970 Quality Management Program	Incorporate and publish AQI data via existing FSCA app	AQI data was published through the publicly available SDG&E's Weather App	Revise to met
WMP.1008 CEADPP updated per changes in procedures, conditions, law, or Commission policy	Submit CEADPP through the annual reporting process required by General Order 166, Standard 11 by Dec 30	The 2024 CEADPP was submitted through the General Order 166 annual reporting process	Revise to met
WMP.1337 PSPS Stakeholder Education and Awareness	Conduct one functional exercise	The required functional exercise was completed in 2024	Revise to met
WMP.1192 QA/QC of Distribution Drone Assessments	100%	All 6,529 completed assessments received QA/QC review	Revise to met

Appendix B

Spatial and Tabular QDR Data Comparative Analysis

Appendix B

SDG&E's Spatial and Tabular QDR Data Comparative Analysis

SDG&E reviewed the findings presented in *Table 7: Energy Safety Summary of Initiatives with Inconsistent QDR Reporting* included in Energy Safety's Annual Performance Report ("APR") for SDG&E's 2024 WMP and identified several instances where the reported Spatial QDR values do not align with the data submitted by SDG&E in its Quarterly Data Reports ("QDRs").

Based on SDG&E's review, many of the reported spatial actuals appear to have been derived using a methodology that differs from the requirements specified in the Energy Safety Data Guidelines ("Guidelines"). As a result, several initiatives were identified as having discrepancies between spatial and tabular reporting when, in fact, the submitted records reconcile when evaluated using the fields and methodology prescribed in the Guidelines.

The Energy Safety Data Guidelines v3.2, issued on January 30, 2024, defines the **QuarterlyProgress** field as follows:

"The amount of the Initiative Target that was completed in the reporting period, if any. This will be in the same units as the Initiative Target. Progress must match what is reported in the Tabular Wildfire Mitigation Data. This field is required."

Consistent with Energy Safety's Data Guidelines v3.2, initiative progress is calculated using the **QuarterlyProgress** field in the geodatabase, which is intended to represent completed work in the same unit of measure as the corresponding initiative target. Therefore, validation of spatial progress should be based on aggregation of the QuarterlyProgress field for completed records associated with the applicable Utility Initiative Tracking ID.

Table 1 below provides initiative-specific clarifications and corrected values. In reviewing the table, the column titled "Spatial Quarterly Progress Total Submitted in Latest GDBs" is the corrected value for what was provided in the "Energy Safety Reported Actual Recorded in Spatial QDR" column. The "Correct Deviation %" column is calculated with the corrected spatial data information and should be compared against the Energy Safety reported "Deviation %" column in Table 7 of the APR.

Table 1: SDG&E Comparison of Energy Safety's Reported Tabular vs Spatial Inconsistencies

Initiative	Energy Safety Reported Actual Recorded in Tabular QDR	Energy Safety Reported Actual Recorded in Spatial QDR	Energy Safety Reported Deviation %	Spatial ¹ Quarterly Progress Total Submitted in Latest GDBs	Correct Deviation %	Most Recent GDB File Names	Most Recent GDB Submission Dates
Strategic Pole Replacement Program WMP.1189	40 poles	34 points	15%	40 poles	0%	Q1: SDGE_2024_Q1_Confidential_Rev20250324.gdb Q2: SDGE_2024_Q2_Confidential_Rev20250324.gdb Q3: SDGE_2024_Q3_Confidential_Rev20250324.gdb Q4: SDGE_2024_Q4_NonConfidential_R2.gdb	Q1: April 1, 2025 Q2: April 1, 2025 Q3: April 1, 2025 Q4: Aug 1, 2025
Early Fault Detection WMP.1195	62 nodes	27 points	56.50%	62 nodes	0%	Q1: SDGE_2024_Q1_Confidential_Rev20250324.gdb Q2: SDGE_2024_Q2_Confidential_Rev20250324.gdb Q3: SDGE_2024_Q3_Confidential_Rev20250324.gdb Q4: SDGE_2024_Q4_NonConfidential_R2.gdb	Q1: April 1, 2025 Q2: April 1, 2025 Q3: April 1, 2025 Q4: Aug 1, 2025
Covered Conductor WMP.455	35.91 miles	72.7 miles	102.5%	34.47 miles	4% ²	Q1: SDGE_2024_Q1_Confidential_Rev20250324.gdb Q2: SDGE_2024_Q2.gdb Q3: SDGE_2024_Q3_Confidential_Rev20250324.gdb Q4: SDGE_2024_Q4_Confidential_Rev20250324.gdb	Q1: April 1, 2025 Q2: Aug 1, 2024 Q3: April 1, 2025 Q4: April 1, 2025
PSPS Sectionalizing WMP.461	18 switches	14 points	22.20%	18 switches	0%	Q1: SDGE_2024_Q1_Confidential_Rev20250324.gdb Q2: SDGE_2024_Q2_Confidential_Rev20250324.gdb Q3: SDGE_2024_Q3_Confidential_Rev20250324.gdb Q4: SDGE_2024_Q4_NonConfidential_R2.gdb	Q1: April 1, 2025 Q2: April 1, 2025 Q3: April 1, 2025 Q4: Aug 1, 2025
Advanced Protection WMP.463	Five circuits	396.9 miles	N/A Units of measure differ between the Spatial QDR and the Tabular QDR.	4.95 circuits	0% ³ (SDG&E rounds to whole circuits)	Q1: N/A Q2: N/A Q3: SDGE_2024_Q3_Confidential_Rev20250324.gdb Q4: SDGE_2024_Q4_Confidential_Rev20250324.gdb	Q1: N/A Q2: N/A Q3: April 1, 2025 Q4: April 1, 2025

¹ To correctly calculate initiative progress, according to Energy Safety's v3.2 Data Guidelines, Sum the QuarterlyProgress field where the UtilityInitiativeTrackingID field equals the respective WMP Initiative ID and the respective Initiative Status field equals Complete.

² Covered Conductor variance occurred because an updated Grid Hardening Line feature class was inadvertently omitted from a revised geodatabase submission.

³ Advanced Protection circuits are broken down by individual line segment records in the gdb and the estimated portion of the whole circuit is populated into that records' QuarterlyProgress. Summation of the QuarterlyProgress field yields 4.95 circuits, which rounds to 5 completed circuits, consistent with SDG&E's tabular reporting. Because Advanced Protection is implemented at the circuit level, rounding to whole circuits is consistent with the manner in which the initiative is implemented and reported.

Initiative	Energy Safety Reported Actual Recorded in Tabular QDR	Energy Safety Reported Actual Recorded in Spatial QDR	Energy Safety Reported Deviation %	Spatial Quarterly Progress Total Submitted in Latest GDBs	Correct Deviation %	Most Recent GDB File Names	Most Recent GDB Submission Dates
Hotline Clamps WMP.464	678 hotline clamps	661 points	56.3% ⁴	678 hotline clamps	0%	Q1: SDGE_2024_Q1_Confidential_Rev20250324.gdb Q2: SDGE_2024_Q2_Confidential_Rev20250324.gdb Q3: SDGE_2024_Q3_Confidential_Rev20250324.gdb Q4: SDGE_2024_Q4_NonConfidential_R2.gdb	Q1: April 1, 2025 Q2: April 1, 2025 Q3: April 1, 2025 Q4: Aug 1, 2025
Strategic Undergrounding WMP.473	112 miles	171 miles	52.70%	108.05 miles	3.53%	Q1: SDGE_2024_Q1_Confidential_Rev20250324.gdb Q2: N/A Q3: SDGE_2024_Q3_Confidential_Rev20250324.gdb Q4: SDGE_2024_Q4_Confidential_Rev20250324.gdb	Q1: April 1, 2025 Q2: N/A Q3: April 1, 2025 Q4: April 1, 2025
Distribution Underbuild WMP.545	7 miles	7.5 miles	7.10%	7 miles	0%	Q1: SDGE_2024_Q1_Confidential_Rev20250324.gdb Q2: SDGE_2024_Q2.gdb Q3: SDGE_2024_Q3_Confidential_Rev20250324.gdb Q4: SDGE_2024_Q4_Confidential_Rev20250324.gdb	Q1: April 1, 2025 Q2: Aug 1, 2024 Q3: April 1, 2025 Q4: April 1, 2025
LTE Communication Network (DCRI) WMP.549	Three stations	7 points	133.30%	3 stations	0%	Q1: N/A Q2: SDGE_2024_Q2_Confidential_Rev20250324.gdb Q3: SDGE_2024_Q3_Confidential_Rev20250324.gdb Q4: N/A	Q1: N/A Q2: April 1, 2025 Q3: April 1, 2025 Q4: N/A
Avian Protection WMP.972	774 poles	702 points	9.30%	774 poles	0%	Q1: SDGE_2024_Q1_Confidential_Rev20250324.gdb Q2: SDGE_2024_Q2_Confidential_Rev20250324.gdb Q3: SDGE_2024_Q3_Confidential_Rev20250324.gdb Q4: SDGE_2024_Q4_NonConfidential_R2.gdb	Q1: April 1, 2025 Q2: April 1, 2025 Q3: April 1, 2025 Q4: Aug 1, 2025

⁴ Hotline Clamps - Unclear how this deviation % was calculated. All other rows seem to use the formula of: =ABS(Tabular_Actual - Spatial_Actual) / Tabular_Actual. So the % here would have been 2.51%, not 56.3%

Initiative	Energy Safety Reported Actual Recorded in Tabular QDR	Energy Safety Reported Actual Recorded in Spatial QDR	Energy Safety Reported Deviation %	Spatial Quarterly Progress Total Submitted in Latest GDBs	Correct Deviation %	Most Recent GDB File Names	Most Recent GDB Submission Dates
Transmission Overhead Detailed Inspections WMP.479	2,940 inspections	2,935 points	0.17%	2,940 inspections	0%	Q1: SDGE_2024_Q1.gdb Q2: SDGE_2024_Q2.gdb Q3: SDGE_2024_Q3.gdb Q4: SDGE_2024_Q4.gdb	Q1: May 1, 2024 Q2: Aug 1, 2024 Q3: Nov 1, 2024 Q4: Feb 1, 2025
Off-Cycle Patrol WMP.508	106 Vegetation Management Areas	Zero ⁵	100% Recorded spatial QDR data results in the initiative as not met.	106 Vegetation Management Areas	0%	Q1: SDGE_2024_Q1.gdb Q2: SDGE_2024_Q2_Confidential_Rev20250324.gdb Q3: SDGE_2024_Q3.gdb Q4: SDGE_2024_Q4.gdb	Q1: May 1, 2024 Q2: April 1, 2025 Q3: Nov 1, 2024 Q4: Feb 1, 2025
Lightning Arrestors WMP.550	1,654 arrestors ⁶	1,547 points	59.7% ⁷	1,652 arrestors	0.06%	Q1: SDGE_2024_Q1_Confidential_Rev20250324.gdb Q2: SDGE_2024_Q2_Confidential_Rev20250324.gdb Q3: SDGE_2024_Q3_Confidential_Rev20250324.gdb Q4: SDGE_2024_Q4_NonConfidential_R2.gdb	Q1: April 1, 2025 Q2: April 1, 2025 Q3: April 1, 2025 Q4: Aug 1, 2025

⁵ Unclear why actuals could not be calculated. All spatial data for WMP.508 can be found in the submitted VegetationInspectionPolygon feature classes.

⁶ Tabular QDR was revised to 1,653 arrestors (SDGE_2024_Q4_Tables1-15_R2.xlsx, submitted August 1, 2025). Spatial was revised to 1,652 arrestors. Difference is due to the revision removing the lightning arrestor record from the gdb, however the record had 2 lightning arrestors associated with that point (2 Units of QuarterlyProgress), but the tabular data revision only removed one unit in error. Tabular should have been revised to 1,652.

⁷ Unclear how this deviation % was calculated. All other rows seem to use the formula of: =ABS(Tabular_Actual - Spatial_Actual) / Tabular_Actual. The % here would have been 6.47%, not 59.7%.