

INDEPENDENT EVALUATOR

Annual Implementation Report for Wildfire Mitigation Plan Implementation Year 2025

July 01, 2026



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DISCLAIMER

This report has been compiled through the process of observation and review of documents provided by the Electrical Corporation named herein. The Office of Energy Infrastructure Safety (“Energy Safety”) instituted the requirement for an independent evaluation of Electric Corporation’s Wildfire Mitigation Plans (“WMP”). Bureau Veritas is not the designer, implementer, or owner of the WMP and is not responsible for its content, implementation and/or any liabilities, obligations or responsibilities arising therefrom.

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1. EXECUTIVE SUMMARY

Background

The devastating wildfires of the past and present have taught us valuable lessons about safeguarding California's lands, particularly in areas where electrical infrastructure coexists with wildland environments. In response to these challenges, the California Public Utilities Commission (CPUC) initiated Rulemaking 18-10-007 to provide guidance on Wildfire Mitigation Plans (WMPs) for Investor-Owned Utilities (IOUs), now referred to as Electrical Corporations (ECs). These WMPs are designed to cover a three-year period, with the first cycle of independent evaluations beginning in 2020.

The 2025 WMP is part of San Diego Gas and Electric's (SDG&E) second three-year planning cycle. SDG&E's 2023-2025 WMP builds on the previous cycle by focusing on enhancements to data analytics and modeling capabilities, technological advancements for mitigating wildfire and PSPS risk, and PSPS awareness events and preparedness. These improvements, combined with existing mitigation measures, are founded on the understanding that effective natural resource management is crucial for maintaining facilities. During the first evaluation of this cycle, which ended in 2023, SDG&E experienced only one PSPS event that did not result in de-energization and overall observed a reduction in wildfire ignition risk. In 2024, SDG&E achieved a reduction in reportable ignitions within the High Fire Threat Districts (HFTD) and High Fire Risk Areas (HFRA) of their service territory. For implementation year 2025, SDG&E's mitigation efforts focused on programs designed to reduce the likelihood of ignitions and mitigations designed to minimize customer impacts associated with PSPS de-energizations.

This Independent Evaluator (IE) Annual Implementation Report (AIR) assesses SDG&E's WMP commitments for implementation year 2025. The IE AIR reviews the WMP initiatives as outlined for 2025 and evaluates SDG&E's performance in meeting their committed objective targets, verification of QA/QC program implementation, processes, and results, as well as the distribution of funding to mitigation efforts described within the WMP.

Pursuant to Public Utilities Code Section 8386.3(c)(2)(B)(i), (ii), (iii), and (iv), Bureau Veritas North America, Inc. (BVNA), in partnership with C2 Group, has been selected as the IE to review and assess SDG&E's 2025 WMP in its entirety. This IE AIR will present BVNA's findings and results for review. BVNA was included in the Office of Energy Infrastructure and Safety (Energy Safety) Independent Evaluator List for 2025 WMPs, dated December 18, 2025, in accordance with Public Utilities Code section 8386.3(c)(2)(A).

In compliance with Energy Safety's requirements, SDG&E has contracted BVNA to provide the IE assessment. This assessment includes the IE responsibilities outlined in Public Utilities Code section 8386.3(c)(5)(C), which involve performing the following tasks:

- Task 1: Consult with Energy Safety on implementation assurance auditing that will be performed
- Task 2: Perform implementation assurance auditing, including field inspections
- Task 3: Draft and provide Energy Safety a report on audit findings, including deficiencies of underfunded WMP activities

- Task 4: Draft and provide Energy Safety a report on deficiencies of electrical corporations
- Task 5: Track and report deficiencies of audit findings

The evaluation process began with an Energy Safety kick-off meeting, which served as an introduction between SDG&E representatives, BVNA staff, and assigned Energy Safety personnel. This introductory meeting established key elements, including communication and documentation protocols, as well as the identification of individuals responsible for receiving requests from the IE. Following this meeting, the IE initiated a review of SDG&E's 2025 WMP and related publicly available documents, as listed in Section 7. This review aimed to identify SDG&E's stated goals within the 2025 WMP.

To evaluate activities described in the WMP that were not available in public records, BVNA's team of evaluators submitted data requests and conducted interviews with Subject Matter Experts (SMEs). These steps helped verify activities stated within the 2023-2025 WMP (see Section 7 for a list of Data Requests/SME Interviews). Detailed analysis and key findings for each respective category are presented in the following sections of this report.

The IE has classified each activity as "Validated," "Not Validated", or "Not Applicable." "Validated" indicates that the EC has clearly demonstrated meeting the stated WMP target for the review year or continues to implement the activity as outlined. "Not Validated" means the EC either failed to provide sufficient documentation to support their claim of implementation or did not meet the WMP target, the individual reviews will elaborate and make the distinction. "Not Applicable" signifies that the EC has determined the activity is not relevant to the current review period.

BVNA's understanding of collected utility strategies demonstrated throughout the state is summarized below:

1. **Inspection and maintenance of distribution, transmission, and substation** includes a comprehensive approach conducting system patrols and ground inspections using advanced technological tools, managing predictive and electrical preventative maintenance, performing vegetation inspections and management, implementing vulnerability detection methods such as Light Detection and Ranging (LiDAR) inspection, and utilizing geospatial and topography identification along with geographic information system (GIS) mapping data. A key aspect of these programs is the identification and collection of data elements through each initiative. Understanding how this data is used and shared is essential for improving utility practices and enhancing overall wildfire mitigation efforts.
2. **System hardening** includes pole replacement, non-expulsion equipment, advanced fuses, tree attachment removal, less flammable transformer oil, covered wire and wire wrap, and undergrounding where it is supported by a cost benefit analysis.
3. **De-energization** actions are triggered and prioritized based on various fire weather conditions such as forecasted, imminent, and validated extreme fire weather conditions. Plans for re-energization when weather conditions subside to safe levels are implemented.

Both manual and automatic capabilities to implement the de-energization and re-energization process exist.

4. **Advanced Technologies** include Distribution Fault Anticipation (DFA) technology, tree growth regulators, pulse control fault interrupters, oblique and hyperspectral imagery, advanced transformer fluids, advanced LiDAR systems, and advanced Supervisory Control and Data Acquisition (SCADA) systems. These technologies help reduce risk of electrical ignition, mitigate power outages, and prevent equipment damage.
5. **Vegetation management**, including routine preventative vegetation maintenance; corrective vegetative management and off-cycle tree work; emergency vegetation clearance, prioritized for portions of the service territory in Tier 2 and 3 HFTD; quality control processes; and resource protection plan, including animal and avian mitigation programs. Enhanced Vegetation Management (EVM) with enhanced inspections, aims to keep all aspects of trees away from power lines and to prescribe minimum clearances that exceed state standards. EVM conducts supplementary inspections in addition to standard patrol routines to identify and address dead, diseased, or declining trees near power lines, ensuring they are removed or managed before they pose a risk to electrical infrastructure.
6. **Situational Awareness** involves gathering real-time information from various sources to create a comprehensive understanding of current conditions. This includes data from devices and sensors on electrical systems, weather monitoring equipment, and other tools that assess wildfire conductivity conditions. Utilization of programs such as online feeds and websites like the National Fire Danger Rating System (NFDRS) help the EC employ risk-informed, data-supported decision-making processes. The goal of these situational awareness efforts is to achieve a shared understanding of actual conditions amongst all stakeholders, thereby improving collaborative planning and decision-making.
7. **Emergency Preparedness, Outreach, and Response** efforts engage a wide range of key stakeholders, including critical facilities, customers, local government, and essential agencies such as CAL FIRE. Strong communication channels are employed with local law enforcement agencies, first responders, hospitals, local emergency planning committees, other utility providers, and the California Independent System Operator. Coordination agreements such as mutual Aid or Assistance, as well as a community outreach plan is in place to inform and engage the various stakeholders.
8. **Operational practices** include communication protocols, and the execution of specific plans designed to minimize fire danger. A key element of this approach is the strategic deactivation of automatic reclosers during high-risk periods. De-energization decisions are based on a multifaceted risk assessment that consider various factors, including the type of facility, tree and vegetation density, the presence of available dry fuel, and other location specific vulnerabilities to wildfire risk.

Introduction to San Diego Gas & Electric

Founded in 1881 and headquartered in San Diego, SDG&E is a regulated public utility providing energy services. As a subsidiary of Sempra Energy, a Fortune 500 company, SDG&E supplies

power to more than 3.7 million people across 25 communities through 1.5 million electric meters and 900,000 gas meters in San Diego and part of Orange County. The service area spans 4,096 square miles, with ~69% located within the HFTD.

SDG&E's distribution infrastructure includes 17,467 circuit miles across 1,056 circuits, and 6,190 of those miles reside within the HFTD. The EC also operates 134 distribution substations and 24 transmission substations. Within these facilities, SDG&E maintains 7 synchronous condensers, 321 power transformers, 2,443 circuit breakers, and 263 capacitor banks. SDG&E's extensive infrastructure also includes federal-jurisdictional transmission lines and equipment. This transmission system comprises 1,993 circuit miles, with 1,037 miles within the HFTD.

The utility operates four power generating plants in its territory. These include the Palomar Energy Center, a 588-megawatt gas-fired combined cycle plant; the Miramar Energy Facility, a 92-megawatt peaking plant; the Cuyamaca Peak Energy Plant, a 45-megawatt peaking plant; and the Desert Star Energy Center, a 480-megawatt combined-cycle plant located in Boulder City, NV.

The service territory encompasses a variety of habitats, such as marsh, coastal sage scrub, chaparral, grassland, riparian, woodlands, forest, and desert. Along the west side of the territory is over 80 miles of coastline and along the east lies mountains greater than 6,500 feet in elevation, due to this variance, a wide range of weather exists in the service territory. The area typically has cooler summers and warmer winters compared to other cities along similar latitudes due to its proximity to the Pacific Ocean and the westerly winds produced.

Throughout the 2023-2025 three-year cycle of the WMP, SDG&E's primary objective is to construct, maintain, and operate its electric line and equipment in a way that minimizes the risk of catastrophic wildfire. This goal is pursued through ongoing initiatives that aim to assess the EC's wildfire risk, develop comprehensive strategies to reduce ignitions, and ensure the reliability of electric systems. Using risk-informed decision making, SG&E aims to minimize ignition risk and outage impacts.

Key Findings

The principal physical and program work was validated, and several initiatives over-delivered against the WMP target. Across the 46 initiatives that received an implementation-verification determination¹, the IE validated 36. Reported completion met or exceeded the 2025 WMP target for the principal hardening and vegetation initiatives, including distribution overhead hardening with covered conductor at 52.03 of 50 circuit miles (WMP.455), strategic undergrounding at 32.57 of 28 circuit miles (WMP.473), strategic pole replacement at 228 of 200 poles (WMP.1189), avian protection at 725 of 200 poles (WMP.972), early fault detection at 125 of 60 nodes (WMP.1195), lightning arrester replacement at 1,015 of 90 arresters (WMP.550), distribution wood pole intrusive inspections at 1,478 of 344 inspections (WMP.483), and

¹ A total of 46 initiatives had a target in the WMP and received an implementation verification determination from the IE.

vegetation detailed inspections at 511,150 of 485,400 inspections (WMP.494). Sample validation was 100 percent on the sampled work for these initiatives.

The principal exceptions are target-completion findings, not workmanship findings. Six of the ten Not Validated initiatives fell below the 95 percent initiative-validation threshold because reported 2025 completion was short of the WMP annual target, while the completed and sampled work was sound at a 100 percent sample validation rate: expulsion fuse replacement at 503 of 700 fuses (WMP.459, program paused from April to July 2025 pending the Petition to Amend), PSPS sectionalizing at 9 of 10 switches (WMP.461, a single device deferred by permitting and installed in February 2026), hotline clamp maintenance at 110 of 950 clamps (WMP.464), transmission overhead detailed inspections at 2,184 of 2,479 inspections (WMP.479), transmission overhead hardening with distribution underbuild at 0 of 2 miles (WMP.545, delayed by environmental restrictions and weather into January 2026), and distribution communications reliability at 4 of 5 stations (WMP.549). For WMP.464, WMP.479, and WMP.545, the 2023 to 2025 cycle target was met or exceeded, including WMP.545 at 24.33 of 9.9 cycle miles, so the exception is the 2025 annual increment rather than the cycle program. A seventh, desk-reviewed item, the Air Quality Index (WMP.970), was Not Validated because the 2025 EC AIR and the 2025 Q4 QDR do not report installation against the 2025 target that remained in effect after SDG&E's requested reduction to zero.

The remaining Not Validated outcomes are records or source-control items rather than broad installation failures. Advanced Protection (WMP.463) was below the annual target at 7 of 8 circuits; the IE does not classify this as a SCADA installation, as noted within the subsequent sections. QA/QC of Distribution Detailed Inspections (WMP.491) and QA/QC of Substation Inspections (WMP.1194) should be described as records/source-control findings where the issue is audit-record consistency rather than field installation quality.

Funding Verification Key Findings:

Thirty-one of the fifty-eight initiatives subject to funding-variance review exceeded the 10 percent absolute percent difference threshold. The IE identified 31 of the 58 initiatives in the confirmed funding-verification scope², or 53 percent, with an absolute percent difference greater than 10 percent between planned and actual 2025 spend. Lightning Arrester Removal and Replacement (WMP.550) is reported separately as a zero-plan, positive-actual exception, with \$0 planned and \$508K actual, because the absolute percent difference formula is not computable on a zero-planned denominator; the item is disclosed rather than omitted from the funding review.

The headline variance overstates implementation effect because many material variances are attributable to reporting basis, timing, denied-amendment baselines, cost reclassification, capital sequencing, and embedded costs rather than reduced delivery. Reconciled to the 2025

² A total of 58 initiatives were determined by the IE to receive funding verification. This includes the 46 initiatives that received an implementation determination and 12 additional initiatives that the IE determined had no implementation target but financial reporting warranting funding verification.

EC AIR Appendix A and to DR004, DR004 Revised Q3, and DR004b, the larger variances are attributable to vegetation cost aggregation, where the \$10,542K of WMP.501 clearance cost was absorbed into the WMP.494 vegetation bucket and produced a 100 percent standalone variance even though 11,921 of 11,200 trees were completed; to FERC funding and cost reclassification, including approximately \$1,425K reclassified across WMP.450 accounting categories; to denied Petition-to-Amend baselines measured against unreduced plans for WMP.459, WMP.464, WMP.972, and WMP.512; to capital resequencing, including approximately \$5.9M deferred from WMP.519 into 2026; and to embedded costs recorded to a parent program, including avian protection (WMP.972) recorded against covered conductor (WMP.455). The IE did not identify evidence that these variances reduced initiative implementation.

The forward-looking observation is that forecast completeness, not funding adequacy, drives several variances. Certain variances trace to forecasts that did not anticipate event-driven response costs or multi-year capital phasing, rather than to insufficient funding. The Emergency Preparedness Plan (WMP.1008) overspent by \$14,386K at 65.0 percent, comprising approximately \$10.7M of direct event-response cost and approximately \$3.3M of post-event information-technology enhancement associated with the two January 2025 PSPS activations per DR004 Q10, measured against the 2025 EC AIR Appendix A actual of \$36,516K. The WMP Data Platform (WMP.519) underspent by \$5,907K at 56.1 percent through capital deferral and resequencing into the 2026 successor program. The IE observes, as context rather than as a formal recommendation, that pairing forecasts with documented event-response and multi-year capital assumptions would reduce headline variance in future cycles.

Initiatives Completed Within 5% of the WMP Targets: 36 Total Number of Initiatives (78% of all SDG&E Initiatives)

Table 1: List of Initiatives that Missed Target or Could Not Be Validated

Initiative Number, WMP Section Number, and Name	Missed Target or Could Not Be Validated
WMP.459, 8.1.4.4, Expulsion Fuse Replacement	Missed Target
WMP.461, 8.1.2.11.1, PSPS Sectionalizing	Could Not Be Validated
WMP.463, 8.1.2.8.1, Advanced Protection	Missed Target
WMP.464, 8.1.4.5, Hotline Clamps	Missed Target
WMP.479, 8.1.3.2, Transmission Overhead Detailed Inspections	Missed Target
WMP.491, 8.1.6.2, QA/QC Detailed Inspections	Could Not Be Validated
WMP.545, 8.1.2.5.2, Distribution Underbuild	Missed Target
WMP.549, 8.1.2.8.3, DCRI	Missed Target
WMP.970, 8.3.2.1.3, AQI – Sensor Installation	Could Not Be Validated
WMP.1194, 8.1.6, QA/QC – Substation Inspections	Could Not Be Validated

Table 2: Initiatives with Absolute % Budget Differences > 10% (Spend in Thousand \$): 31
Total Number of Initiatives (53% of all SDG&E Initiatives)

Initiative Number, WMP Section Number, and Name	Total Budget	Total Expenditure	Total Variance Between Budget and Expenditure
WMP.450, 8.3.6, Fire Potential Index	\$4,538	\$3,013	-33.6%
WMP.455, 8.1.2.1, Covered Conductor	\$83,473	\$92,501.43	10.8%
WMP.459, 8.1.4.4, Expulsion Fuse Replacement	\$1,549.57	\$950.30	-38.7%
WMP.461, 8.1.2.11.1, PSPS Sectionalizing	\$1,485	\$980.51	-34.0%
WMP.462, 8.1.2.7, Microgrids	\$1,236	\$2,158	74.5%
WMP.464, 8.1.4.5, Hotline Clamps	\$1,753.18	\$453.21	-74.1%
WMP.466, 8.1.2.11.3, Generator Grant Program	\$3,953	\$2,180	-44.9%
WMP.467, 8.1.2.11.4, Generator Assistance Program	\$494	\$670.62	35.8%
WMP.468, 8.1.2.11.2, Standby Power Programs	\$1,000	\$1,937	193.7%
WMP.475, 8.1.2.5.1, Traditional Hardening	\$5,950	\$7,655.78	28.7%
WMP.479, 8.1.3.2, Transmission Overhead Detailed Inspections	\$1,957.92	\$1,544.78	-21.1%
WMP.481, 8.1.3.3, Distribution Infrared Inspections	\$5	\$13.58	171.6%
WMP.483, 8.1.3.5, Distribution Wood Pole Intrusive Inspections	\$1,541.42	\$1,345.92	-12.7%
WMP.494, 8.2.2.1, Detailed Inspections	\$61,886.52	\$41,338.62	-33.2%
WMP.497, 8.2.3, Fuels Management	\$5,445	\$3,187.33	-41.5%
WMP.501, 8.2.3.3., Clearance	\$10,542.05	\$0	-100%
WMP.512, 8.2.3.1, Pole Clearing	\$8,129.98	\$4,613.35	-43.3%

Initiative Number, WMP Section Number, and Name	Total Budget	Total Expenditure	Total Variance Between Budget and Expenditure
WMP.519, 8.1.5.4.1, Centralized Repository for Data (WMP Data Platform)	\$10,524	\$4,617	-56.1%
WMP.523, Allocation Methodology	\$5,045	\$2,567	-49.1%
WMP.527, 8.4.2/8.4.3/8.4.4, Public Outreach & Education	\$605	\$535	-11.5%
WMP.545, 8.1.2.5.2, Distribution Underbuild	\$3,501	\$2,734.92	-21.9%
WMP.552, 8.1.3.7, Distribution Drone Assessments	\$86,427.19	\$67,053.48	-22.4%
WMP.557, 8.1.8.3.3, Aviation Firefighting Program	\$8,280	\$5,283	-36.2%
WMP.563, 8.4.4, Public Emergency Communication Strategy	\$17,860	\$15,498	-13.2%
WMP.972, 8.1.2.10.1, Avian Protection	\$1,522.65	\$347.33	-77.2%
WMP.1008, 8.4.2.1.1 CEADPP Updated	\$22,130.42	\$34,477.71	55.8%
WMP.1017, CNF Distribution Overhead	\$879	\$486	-44.7%
WMP.1189, 8.1.2.10.2, Strategic Pole Replacement Program	\$8,226.27	\$9,070.73	10.3%
WMP.1195, 8.1.2.8.2, Early Fault Detection	\$4,419	\$5,887.62	33.2%
WMP.1430, Weather Station Maintenance & Calibration	\$260.69	\$75.13	-71.2%
WMP.1431, Air Quality Station Maintenance	\$84	\$62.19	-26.0%

Recommendations

Clarify the reporting basis behind the funding variances. Some of the larger variances reflect how and where costs were recorded, such as aggregation across programs (WMP.501 within WMP.494), embedding in a parent initiative (WMP.972 within WMP.455), accounting reclassification, or FERC funding, or a baseline measured against a requested target change that

was not adopted (WMP.464), rather than reduced delivery. The IE recommends that SDG&E consider noting these recording and baseline bases in the funding tables, so the variances read as reporting structure rather than under-execution where delivery met or exceeded the target.

Strengthen the consistency between records and source documentation. A small number of outcomes turned on the consistency of audit records, or on whether installed equipment had been commissioned, rather than on the quality of the field work, which the IE found satisfactory. This includes a QA/QC audit review where the records and the audit population did not fully reconcile (WMP.491) and advanced protection counted as complete before the associated equipment was commissioned (WMP.463). The IE recommends that SDG&E consider aligning its audit records with their supporting documentation and reflecting commissioned status in its completion reporting, so these outcomes read as records matters rather than delivery shortfalls.

Build event-response and multi-year assumptions into forecasts. A few variances trace to forecasts that did not anticipate event-driven response costs or the phasing of multi-year capital rather than to funding adequacy, such as the emergency response costs from the January 2025 PSPS activations (WMP.1008) and capital phased into a 2026 successor program (WMP.519). As a forward-looking observation, the IE recommends that SDG&E consider reflecting documented event-response and multi-year capital assumptions in future forecasts, which would reduce headline variance in coming cycles.

For WMP.505, documenting follow-up corrective actions for the three failed vegetation QA/QC audits would complete the audit trail and demonstrate that identified deficiencies were systematically addressed. For WMP.1194, providing unique audit reports for all claimed completions or justifying duplicate Miguel Substation forms would resolve potential double-counting concerns and ensure completion metrics accurately reflect distinct audit activities performed. For WMP.491 and WMP.508, investigating the root cause of incomplete sampling responses (25 of 34 and 19 of 26 records provided respectively) and implementing record management improvements would ensure that all completed activities can be readily documented upon request.

2. FOCUS INITIATIVES AND DISCUSSION

For WMP Implementation Year 2025, Energy Safety instructed the IE to select up to fifteen initiatives for a “focused” more thorough analysis. These “Focus Initiative” were chosen by BVNA based on several key factors.

First, the IE considered the number and nature of “Notice of Violations” (NOVs) and “Notice of Nonperformance” (NONs) received by the EC in 2025, prioritizing initiatives related to these violations to verify implementation efforts. Funding allocation was another crucial consideration, with initiatives receiving the highest planned or actual expenditure being selected. Additionally, initiatives showing significant variance (~20%) between planned and actual spending were generally chosen, especially if target goals were not met. The WMP Risk Impact Percentage was also evaluated to assess each initiative’s potential for fire risk reduction. Historically, grid hardening and vegetation management initiatives have proven most effective in mitigating fire risks and typically comprise the majority of Focus Initiatives. The specific fifteen initiative selected by BVNA for focused analysis are listed in Table 3 below. This approach to initiative selection ensures a thorough evaluation of the EC’s most critical and impactful wildfire mitigation efforts.

Table 3: List of Focus Initiatives

No.	Initiative Number, WMP Section Number, and Name
1	WMP.459, 8.1.4.4, Expulsion Fuse Replacement
2	WMP.461, 8.1.2.11.1 PSPS Sectionalizing
3	WMP.463, 8.1.2.8.1, Advanced Protection
4	WMP.464, 8.1.4.5, Hotline Clamps
5	WMP.468, 8.1.2.11.2, Standby Power Programs
6	WMP.475, 8.1.2.5.1, Traditional Hardening
7	WMP.479, 8.1.3.2, Transmission Overhead Detailed Inspections
8	WMP.482, 8.1.3.4, Transmission Infrared Inspections
9	WMP.494, 8.2.2.1, Detailed Inspections
10	WMP.501, 8.2.3.3, Clearance
11	WMP.545, 8.1.2.5.2, Distribution Underbuild
12	WMP.549, 8.1.2.8.3, DCRI
13	WMP.550, 8.1.4.6, Lightning Arresters
14	WMP.972, 8.1.2.10.1, Avian Protection
15	WMP.1008, 8.4.2.1.1, CEADPP Updated

3. SITE AND SAMPLE SELECTION AND DISCUSSION

Table 4: List of Field Verified Initiatives

No.	Initiative Number, WMP Section Number, and Name
1	WMP.455, 8.1.2.1, Covered Conductor
2	WMP.463, 8.1.2.8.1, Advanced Protection
3	WMP.464, 8.1.4.5, Hotline Clamps
4	WMP.473, 8.1.2.2, Strategic Undergrounding
5	WMP.475, 8.1.2.5.1, Traditional Hardening
6	WMP.543, 8.1.2.5.2, Transmission OH Hardening
7	WMP.545, 8.1.2.5.2, Distribution Underbuild
8	WMP.549, 8.1.2.8.3, DCRI
9	WMP.550, 8.1.4.6, Lightning Arresters
10	WMP.972, 8.1.2.10.1, Avian Protection
11	WMP.1189, 8.1.2.10.2, Strategic Pole Replacement Program
12	WMP.1195, 8.1.2.8.2, Early Fault Detection

Sample Location Methodology

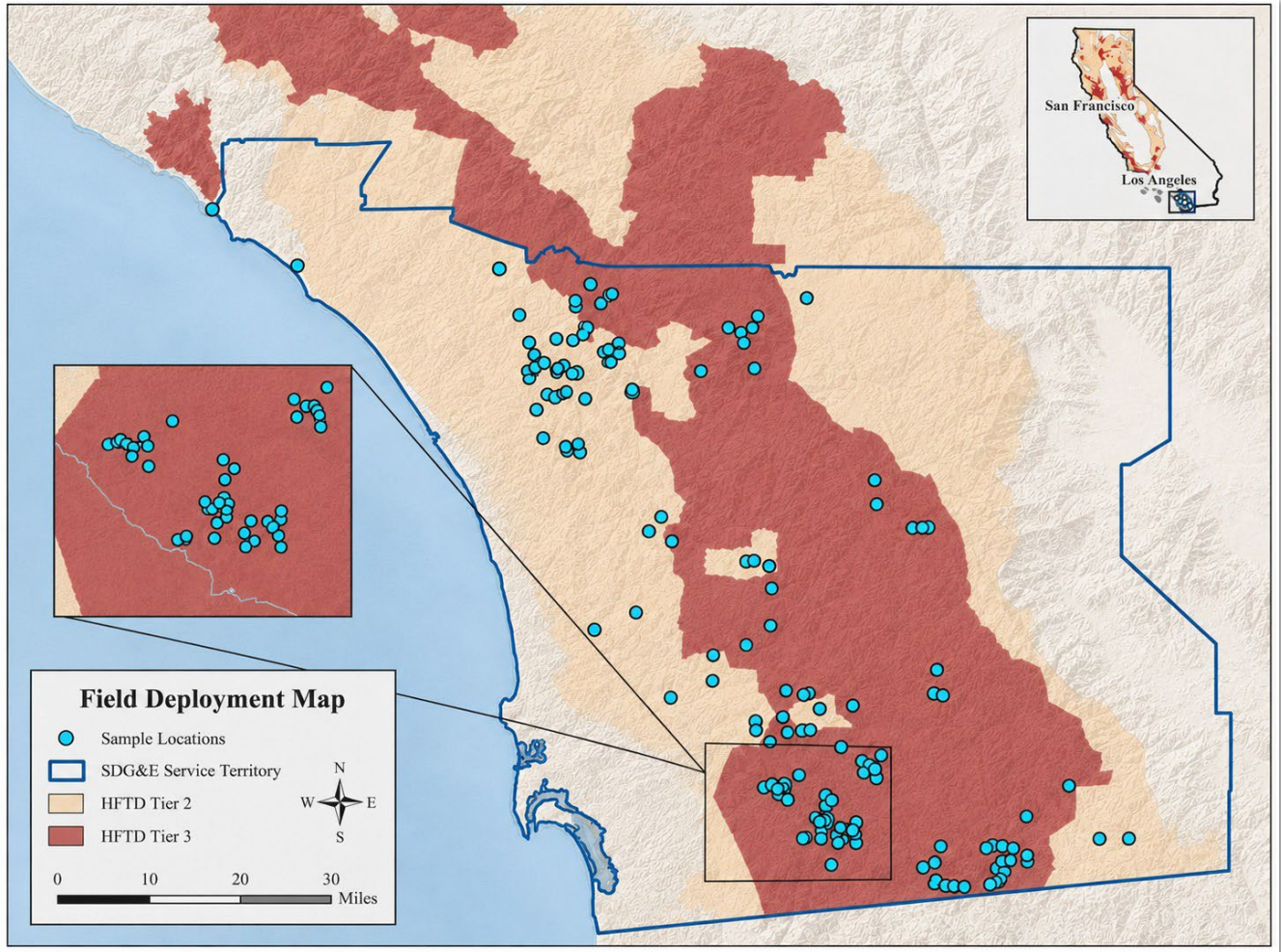
BVNA utilized random sampling for San Diego Gas and Electric based upon a simplified version of Cochran's Sample Size Formula. Utilization of this formula helps determine the appropriate sample size required to achieve a desired level of precision and confidence in the results – this ensures that the sample is representative of the larger population. By specifying a confidence level for the EC's individual initiatives based upon historical trends and data, mainly previous year's validation rates, the conclusions drawn from the sample data have a higher degree of statistical confidence. This confidence rate ranged from 85% and 95%, and if the previous year's validation rate fell outside of this range, the low or high end was utilized. For example, if the prior year sample validation rate was 96%, then 95% was used, if the previous year sample validation rate was 84%, then 85% was used. If no information on the prior year's sample validation rate exists, then 90% was used, unless other factors influenced that determination.

Whether or not an initiative was classified as Focus or non-Focus also affected the number of samples required for a given initiative. For Focus Initiatives, the margin of error (MOE) was set at 5% and for non-Focus Initiatives, the MOE was set at 10%. Although there is only a 5% difference between these two MOEs, the difference in sample size produced when utilizing these two MOE values is quite significant. As the margin of error *increases*, the required sample size decreases because a larger margin of error allows for *more* variability in the sample, requiring fewer samples to achieve the desired level of precision. As the margin of error *decreases*, the opposite happens because a smaller margin of error allows for *less* variability in the sample, requiring more samples to achieve the desired level of precision. Therefore, Focus Initiatives require more sampling than non-Focus Initiatives.

Once the total number of samples was calculated for each initiative, the IE determined how many samples should come from non-HFTD, HFTD Tier 2, and HFTD Tier 3 areas. Due to HFTD-Tier

3 areas posing the most significant threat to wildfire ignition risk, it was determined that 70% of the sampling would occur in these areas, while 20% of sampling would occur in HFTD Tier 2 areas, and the remaining 10% would occur in non-HFTD areas. If a certain initiative did not reside within a HFTD Tier 3 area, then the sampling number would be drawn from a HFTD Tier 2 area; if an initiative did not reside within either a HFTD Tier 3 or 2 area, then all samples were drawn from the non-HFTD area. An additional 25% of samples were identified to be used in the case that any of the primary samples were unusable or inaccessible.

Figure 1: Overview of Field Areas Sampled



4. REVIEW OF INITIATIVES ACROSS WMP CATEGORIES: IMPLEMENTATION AND FUNDING

Table 5: WMP Initiative Category Initiative Summary

WMP Initiative Category	No. of Focus and Field Verifiable Initiatives	No. of Focus and Non-Field Verifiable Initiatives	No. of Non-Focus and Field Verifiable Initiatives	No. of Non-Focus and Non-Field Verifiable Initiatives
Grid Design, Operations, and Maintenance	7	5	5	16
Vegetation Management and Inspections	0	2	0	4
Situational Awareness and Forecasting	0	0	0	3
Emergency Preparedness	0	1	1	0
Community Outreach and Engagement	0	0	0	2

Funding Evaluation Methodology

The IE employed a comprehensive approach to evaluate funding compliance for each initiative in the WMP. The funding methodology approach included the following:

Budget Baseline Establishment: The IE established a baseline for planned expenditures by thoroughly reviewing budget information documented in SDG&E's approved 2025 WMP filing. These planned budget figures were cross verified against SDG&E's officially reported data, specifically examining the EOY Report 2025 Table 11 which took precedence if any discrepancies were noted.

Actual Expenditure Verification: Actual financial expenditures reported by SDG&E in their April 2026 ARC Appendix A: 2025 EC AIR Summary of Expenditures and Targets for Expense and Capital were compared against established WMP budget baselines.

Variance Analysis: The IE calculated the absolute percent differences for each initiative by applying the formula as required by Energy Safety guidelines. These calculations were conducted for every initiative, generating detailed variance data for further review and analysis.

Threshold Application: A predefined threshold of 10% absolute percent difference was applied to systematically identify initiatives that required deeper review.

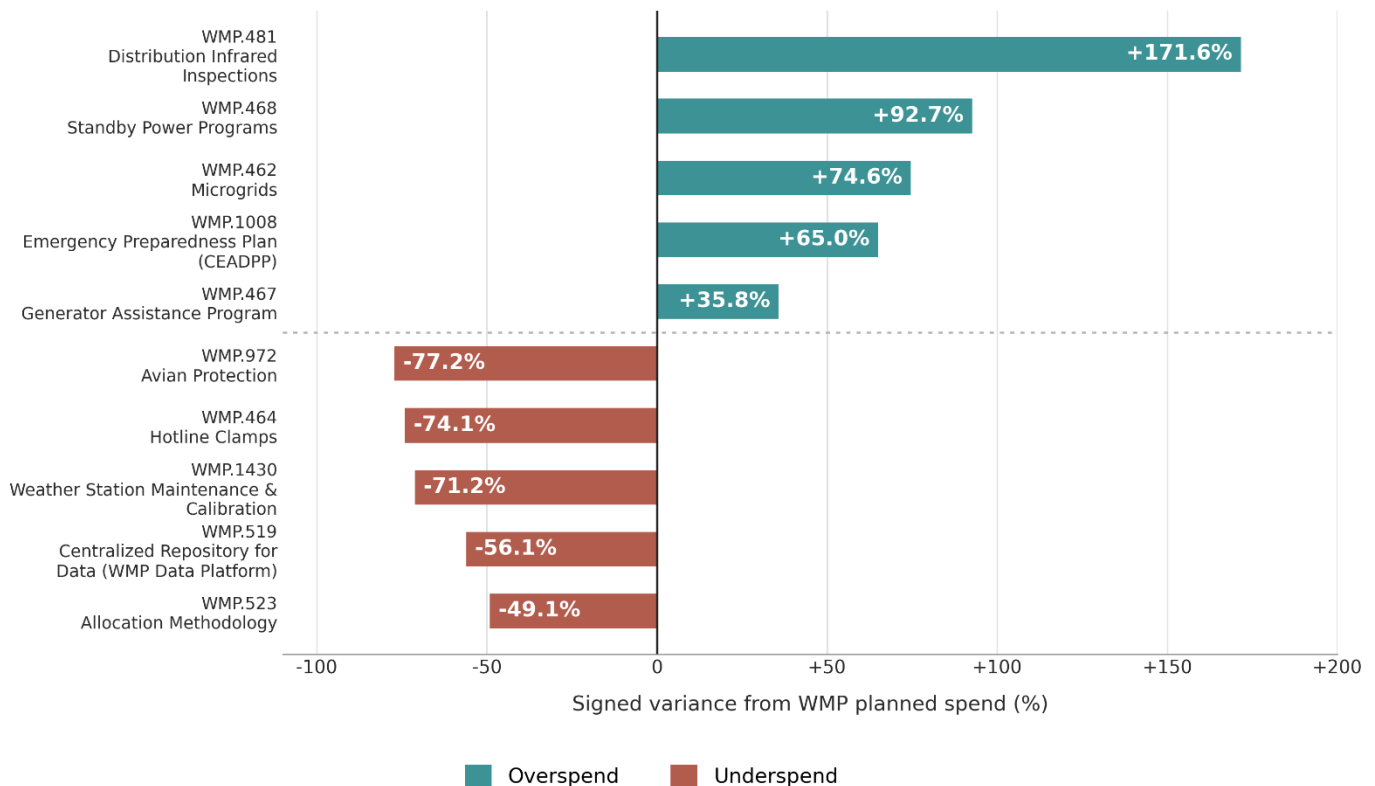
Supporting Documentation Review: For initiatives exceeding the established 10% variance threshold, the IE requested additional supporting documentation and detailed explanations from SDG&E. If SDG&E's rationale provided in the ARC was insufficient or incomplete, the IE explicitly asked for further documentation as necessary to achieve clarity and validate the reasoning behind the variances.

Detailed Analysis and Reporting: The IE documented any funding discrepancies identified during the evaluation, provided accurate corrected values, and analyzed the underlying causes for each variance, as detailed in Section 4 of this report and the top five (5) positive and negative variances as summarized in Figure 2.

Figure 2: Top 5 Positive & Negative Variance by Initiative (%)

Figure 2: Top 5 Positive and Negative Budget Variances by Initiative (%)

Implementation Year 2025 | Signed variance = (actual minus planned) / WMP planned spend



Note: Positive values indicate actual spend above WMP planned spend; negative values indicate actual spend below WMP planned spend. Spend reported in thousands of dollars.

4.1 GRID DESIGN, OPERATIONS, AND MAINTENANCE

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.1.1 Initiative Summary Table

Table 6: Initiative Summary Table (Spend in Thousand \$)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ³	Sample Validation Rate (%) ^{4, 5}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{6, 7}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
WMP.455, 8.1.2.1, Distribution Overhead Hardening (Covered Conductor)	50 Miles	52.03 Miles	Exceeded	21 Miles	100%	Field Inspections Circuit Locations (Frontload Data)	104%	\$83,473	\$92,501.43 (10.8%)	Yes 0.69%
WMP.459, 8.1.4.4, Expulsion Fuse Replacement	700 Fuses	503 Fuses	Delayed	109 Fuses	100%	SDG&E Geodatabase File Expulsion Fuse Replacement List (Frontload Data) 109 Fuse Records (DR018)	72%	\$1,549.57	\$950.30 (-38.7%)	No 6.03%
WMP.461, 8.1.2.11.1, PSPS Sectionalizing	10 Switches	9 Switches	Completed	9 Switches	100%	PSPS Section Enhance List (Frontload Data) SDG&E Written Response 7 Install Records (9 Switches) (DR019)	90%	\$1,485	\$980.51 (-34.0%)	No 16.67%
WMP.462, 8.1.2.7, Microgrids ⁸	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$1,236	\$2,158 (75%)	N/A
WMP.463, 8.1.2.8.1, Advanced Protection	8 Circuits	7 Circuits	Delayed	7 Circuits	88%	Field Inspections Circuit Structure Locations & As-builts (DR020.b) SME Interview (DR020.b)	78%	\$8,155	\$8,452.64 (3.6%)	Yes 0.92%
WMP.464, 8.1.4.5, Maintenance, Repair, and Replacement of Connectors, Including Hotline Clamps	950 Hotline Clamps	110 Hotline Clamps	Delayed	62 Hotline Clamps	100%	Field Inspections Pole Locations (Frontload Data & DR003)	12%	\$1,753.18	\$453.21 (-74.1%)	No 0.13%

³ N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.

⁴ The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.

⁵ N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.

⁶ The Initiative Validation Rate is determined by taking the Sample Validation Rate (%) times the EC-claimed amount and then divided by the WMP Initiative Target.

⁷ Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95%.

⁸ This initiative has no target, but a financial audit was performed. Refer to the financial review under section 4.1.2.2 for more detail.



Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ³	Sample Validation Rate (%) ^{4, 5}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{6, 7}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
WMP.466, 8.1.2.11.3, Generator Grant Program	Continue to provide portable backup power solutions to vulnerable, electricity dependent customers.	The Qualitative Milestones for this Program Were Achieved	Completed	N/A	N/A	SDG&E Written Response (Frontload Data)	100%	\$3,953	\$2,180 (-44.9%)	No Goal Provided
WMP.467, 8.1.2.11.4, Generator Assistance Program	Continue to provide rebates on portable backup power solutions to customers who experience PSPS	The Qualitative Milestones for this Program Were Achieved	Completed	N/A	N/A	SDG&E Written Response 2025 GAP End of Program Report (Frontload Data)	100%	\$494	\$670.62 (35.8%)	No Goal Provided
WMP.468, 8.1.2.11.2, Standby Power Programs	89 Generators	88 Generators	Completed	54 Generators	100%	Fixed Power Backup List (Frontload Data) 54 Work Records (DR024)	99%	\$1,000	\$3,965.25 (296.5%)	No 19.91%
WMP.473, 8.1.2.2, Strategic Undergrounding	28 Miles	32.57 Miles	Exceeded	17 Miles	100%	Field Inspections Circuit Locations (Frontload Data) As-builts (DR025)	116%	\$87,221	\$88,750.98 (1.8%)	Yes 2.36%
WMP.475, 8.1.2.5.1, Distribution Overhead System Hardening	0 Miles	0.11 Miles	Completed	.11 Miles	100%	Field Inspections Pole Locations (Frontload Data)	N/A ⁹	\$5,950	\$7,655.78 (28.7%)	No Goal Provided
WMP.478, 8.1.3.1, Distribution Overhead Detailed Inspections	13,275 Inspections	17,950 Inspections	Exceeded	35 Inspections	100%	SDG&E Asset Inspection Points List (Frontload Data) 35 Inspection Records (DR027)	135%	\$10,056.63	\$9,186.04 (-8.7%)	Yes 1.94%
WMP.479, 8.1.3.2, Transmission Overhead Detailed Inspections	2,479 Inspections	2,184 Inspections	Delayed	130 Inspections	100%	SDG&E Asset Inspection Points List (Frontload Data) 130 Inspection Records (DR028)	88%	\$1,957.92	\$1,544.78 (-21.1%)	No 0.96%
WMP.481, 8.1.3.3, Distribution Infrared Inspections	300 Inspections	302 Inspections	Exceeded	31 Inspections	100%	SDG&E Asset Inspection Points List (Frontload Data) SDG&E Written Response 31 Inspection Records (DR029)	101%	\$5	\$13.58 (171.6%)	N/A
WMP.482, 8.1.3.4, Transmission Infrared Inspections	7,331 Inspections	6,976 Inspections	Completed	136 Inspections	100%	SDG&E Asset Inspection Points List (Frontload Data) SDG&E Written Response 31 Inspection Records (DR030)	95%	\$0	\$0	Yes 0.18%

⁹ Per SDG&E’s 2023-2025 WMP Section 8.1.1.2, the 2025 target for WMP.475 is 0 miles. SDG&E completed 0.11 miles of carryover work in 2025, which the IE validated through field inspection at a 100 percent sample validation rate. Because the target is 0 miles, the IE cannot calculate an initiative validation rate and reports it as N/A.



Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ³	Sample Validation Rate (%) ^{4, 5}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{6, 7}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
WMP.483, 8.1.3.5, Distribution Wood Pole Intrusive Inspections	344 Inspections	1,478 Inspections	Exceeded	34 Inspections	430%	SDG&E Asset Inspection Points List (Frontload Data) 34 Inspection Records (DR031)	430%	\$1,541.42	\$1,345.92 (-12.7%)	Yes 0.03%
WMP.488, 8.1.3.8, Distribution Overhead Patrol Inspections	86,535 Inspections	86,040 Inspections	Completed	35 Inspections	100%	SDG&E Asset Inspection Points List (Frontload Data) 35 Inspection Records (DR032)	99%	\$1,183.95	\$1,165.88 (-1.5%)	No 4.37%
WMP.489, 8.1.3.9, Transmission Overhead Patrol Inspections	7,533 Inspections	7,263 Inspections	Completed	34 Inspections	100%	SDG&E Asset Inspection Points List (Frontload Data) SDG&E Written Response 34 Inspection Records (DR033)	96%	\$0	\$0	No 0.03%
WMP.491, 8.1.6.2, Quality Assurance/Quality Control of Distribution Detailed Inspections	50% of Issues Identified Additional 5% of Inspections (1,104 Audits) ¹⁰	59%	Exceeded	34 Inspection Audits	74%	QA/QC Audit List (Frontload Data) 34 Audit Records (DR034) SDG&E Written Response (DR034.b)	72%	\$0	\$0	No Goal Provided
WMP.492, 8.1.3.11, Substation Patrol Inspections	384 Inspections	391 Inspections	Exceeded	32 Inspections	100%	SDG&E Asset Inspection Points List (Frontload Data) 32 Inspection Records (DR035)	102%	\$0	\$0	N/A
WMP.543, 8.1.2.5.2, Transmission Overhead Hardening	2 Miles	2 Miles	Completed	2 Miles	100%	Field Inspections Circuit Locations (Frontload Data) As-builts (DR044/.b)	100%	\$0	\$0	Yes 0.06%
WMP.545, 8.1.2.5.2, Transmission Overhead Hardening (Distribution Underbuild)	1.8 Miles	The Projected Target Was Not Met	Delayed	0	N/A	SDG&E Written Response (DR045)	0%	\$3,501	\$2,734.92 (-21.9%)	No 0.01%
WMP.549, 8.1.2.8.3, Distribution Communications Reliability Improvements	5 Stations	4 Stations	Delayed	4 Stations	100%	Field Inspections DCRI Locations (Frontload Data)	80%	\$10,987	\$11,989.98 (9.1%)	N/A
WMP.550, 8.1.4.6, Lightning Arrester Removal and Replacement	90 Arresters	1,015 Arresters	Exceeded	122 Arresters	100%	Field Inspections Pole Locations (Frontload Data)	1128%	\$0	\$508.18 (100%)	Yes 0.02%

¹⁰ Refer to Section 4.1.2.1, Initiative Review for WMP.491 for more information on initiative target and validation.



Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ³	Sample Validation Rate (%) ^{4, 5}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{6, 7}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$) and % from budget	Satisfied Risk Reduction Goal?
WMP.552, 8.1.3.7, Drone Assessments	13,500 Inspections	13,500 Inspections	Completed	34 Inspections	100%	SDG&E Asset Inspection Points List (Frontload Data) 34 Inspection Records 2 Findings Inspection Reports (DR048)	100%	\$86,427.19	\$67,053.48 (-22.4%)	No 13.91%
WMP.555, 8.1.3.10, Transmission 69kV Tier 3 Visual Inspections	1,632 Inspections	1,601 Inspections	Completed	34 Inspections	100%	SDG&E Asset Inspection Points List (Frontload Data) SDG&E Written Response 34 Inspection Records (DR049)	98%	\$0	\$0	No 0.02%
WMP.972, 8.1.2.10.1, Avian Protection	200 Poles	725 Poles	Exceeded	116 Poles	100%	Field Inspections Pole Locations (Frontload Data)	363%	\$1,522.65	\$347.33 (-77.2%)	Yes 0.02%
WMP.1189, 8.1.2.10.2, Strategic Pole Replacement Program	200 Poles	228 Poles	Exceeded	30 Poles	100%	Field Inspections Pole Locations (Frontload Data)	114%	\$8,226.27	\$9,070.73 (10.3%)	No 0.21%
WMP.1190, 8.1.3.6, Transmission Wood Pole Intrusive Inspections	141 Inspections	163 Inspections	Exceeded	29 Inspections	100%	SDG&E Asset Inspection Points List (Frontload Data) 29 Inspection Records (DR008)	116%	\$0	\$0	N/A
WMP.1191, 8.1.6 QA/QC – Transmission Inspection	100% of Conditions Identified	100% Internal Audits	Completed	30 Inspection Audits	100%	QA/QC Audit List (Frontload Data) SDG&E Written Response 30 Audit Records (DR009)	100%	\$0	\$0	No Goal Provided
WMP.1192, 8.1.6.3, Quality Assurance/Quality Control of Distribution Drone Assessments	13,500 Internal Inspection Audits	13,500 Audits	Completed	34 Inspection Audits	100%	QA/QC Audit List (Frontload Data) 34 Audit Records (DR010)	100%	\$0	\$0	No Goal Provided
WMP.1193, 8.1.6, QA/QC – Wood Pole Intrusive	10% Internal Inspection Audits ¹¹	31.50% Internal Audits ¹¹	Exceeded	34 Inspection Audits	62%	QA/QC Audit List (Frontload Data) 34 Audit Records (DR011)	195%	\$0	\$0	No Goal Provided
WMP.1194, 8.1.6.5, QA/QC – Substation Inspections	18 Internal Inspection Audits	18 Audits	Completed	12 Inspection Audits	100%	QA/QC Audit List (Frontload Data) 18 Audit Records (DR012)	94% ¹²	\$0	\$0	No Goal Provided

¹¹ Refer to Section 4.1.2.1, Initiative Review for WMP.1193 for more information on initiative target and validation.

¹² Although all sampling data was validated, due to the duplicative nature of the Miguel audit forms, it is determined that the Miguel audit is being captured for completion twice, when only one audit was performed resulting in a 94% initiative validation rate. (17 * 1 / 18 = .9444 * 100 = 9.44%) See Section 4.1.2.1, Initiative Review for WMP.1194.

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ³	Sample Validation Rate (%) ^{4, 5}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{6, 7}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
WMP.1195, 8.1.2.8.2, Early Fault Detection	60 Nodes	125 Nodes	Exceeded	27 Nodes	100%	Field Inspections Pole Locations (Frontload Data)	208%	\$4,419	\$5,887.62 (33.2%)	Yes 3.52%



4.1.2 Written Detail for Initiatives

4.1.2.1 Initiative Review – Findings & Method

WMP.455 – 8.1.2.1 – Distribution Overhead Hardening (Covered Conductor) – Non-Focus & Field Verifiable

Distribution overhead hardening through covered conductor installation reduces the likelihood that contact between energized lines and foreign objects, including vegetation, animals, and debris, results in faults and ignitions on SDG&E's overhead distribution system. The initiative is one of SDG&E's primary grid hardening tools in the High Fire Threat District (HFTD) and is implemented in coordination with adjacent hardening, undergrounding, and protection programs. As described in SDG&E's 2023 to 2025 Wildfire Mitigation Plan (WMP) R5, SDG&E set the 2025 target completion of 50 circuit miles for this initiative with a risk reduction goal 0.68% as noted in SDG&E's 2025 AIR Report. Note that on April 10, 2025, SDG&E filed a Petition to Amend its 2023–2025 Base WMP, requesting an increase from 40 to 50 miles consistent with its General Rate Case decision (D.24-12-074), and Energy Safety approved the amendment on July 11, 2025, establishing 50 circuit miles as the 2025 target.

Per SDG&E's 2025 Q4 Quarterly Data Report (QDR), provided in response to the front-loaded data request, SDG&E reported completing 52.03 circuit miles of covered conductor installation against the 50 circuit mile WMP target. The 2025 EC AIR for the 2025 WMP, dated April 1, 2026, also reports 52.03 circuit miles of covered conductor installation.

The IE relied on the front-loaded data request response, which included the 2025 Combined QDR geodatabase containing circuit-, segment-, and structure-level locations for covered conductor segments completed in 2025. The IE field sampled 26 circuit miles using ground patrols supported by geo-referenced photographs and 360-degree video where roadway access permitted. At each sampled location, the IE confirmed that the covered conductor was installed on the documented circuit and segment, that the conductor length and location matched the spatial records, that hardware, including dead ends, suspension clamps, and splices, was appropriate for the covered conductor, and that structure numbers were visible and matched the records. Sampled installations were complete and aligned with the reported GIS coordinates.

SDG&E reported completing 52.03 circuit miles against the 50-circuit-mile target, a status of Exceeded. Field results were consistent with the reported value, and the IE confirmed that the WMP target was met. Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Figure 3:
Example Covered Conductor Installation Field Images



Table 7: Distribution Overhead Hardening (Covered Conductor)

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
50 circuit miles	52.03 circuit miles	52.03 circuit miles	52.03 circuit miles	104%

WMP.459 – 8.1.4.4 Expulsion Fuse Replacement– Focus and Non-Field Verifiable

Expulsion fuses are designed to create a significant expulsion within the fuse when the system experiences a fault or overcurrent. The resulting open fuse isolates the fault and limits further damage to other equipment. However, the internal expulsion requires the fuse to be equipped with a venting system that discharges energy to the atmosphere; this discharge has the potential to ignite vegetation. This initiative replaces existing fuses with new, more fire-safe expulsion fuses approved by CAL FIRE.

The 2023-2025 WMP set a target of 700 fuse replacements. SDG&E provided a risk reduction goal of 6.03%. In the 2025 EC AIR Table 5-1, SDG&E stated that the risk reduction goal was 0.78% and achieved with an actual risk reduction of 2.97%. SDG&E claimed 503 fuse

replacements in the 2025 AIR. Data provided in the frontload request indicates that 503 fuse replacements were made in 2025.

The IE requested documentation for 77 fuse replacements in HFTD Tier 3, 21 in HFTD Tier 2, and 11 in non-HFTD in DR018. SDG&E responded by providing a spreadsheet with 48 records, some of which represented multiple fuse replacements, which brought the total records to 109. Installation reports and records were provided and verified for all 109 of the fuse replacement samples. This was done by matching the GhID in the spreadsheet with the installation report titles and verifying fuses were included in the work order.

The quantity of installed fuses in 2025 was 72% of the total target and therefore falls outside the 95% initiative validation rate set by Energy Safety. Based on this analysis, the documentation provided, and sampling verification, the IE has not validated this initiative.

Table 8: Expulsion Fuse Replacement

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR018 Response	Initiative Validation Rate
700 fuses	503 fuses	503 fuses	503 fuses	72%

WMP.461 – PSPS Sectionalizing – Focus and Non-Field Verifiable

This initiative installs switches in strategic locations improving the ability to isolate high-risk areas for potential de-energization. By increasing the number of remotely operated sectionalizing devices on higher risk circuits, SDG&E can reduce the number of customers that may be impacted by a potential PSPS event and/or reduce the duration of de-energization based on local wind events.

The 2023-2025 WMP set a target of 10 switch installations. SDG&E provided a risk reduction goal of 16.67% in the 2023-2025 WMP. In the 2025 EC AIR Table 5-1, SDG&E stated that the risk reduction was not achieved, falling short with an actual risk reduction rate of 12.50%. Due to the program's accelerated work strategy in 2023 and 2024, the remaining work for 2025 was reduced. SDG&E claims that the program outperformed the forecasted risk reduction over the 3-year cycle due to over completion of the planned scope with 123% completion. The 2025 EC AIR claimed nine (9) switch installations. Data provided in the frontload request via spreadsheet indicates that nine (9) switches were installed in 2025.

The IE requested documentation for the nine switches installed in DR019. SDG&E responded by providing a spreadsheet with 8 records, some of which represented multiple switch installations, which brought the total records to 9. Installation reports and records were provided and verified for all 9 of the switch installation samples. This was done by matching the GhID in the spreadsheet with the installation report titles and verifying switches were included in the work order. Explanatory material included with DR019 response clarified the field change order from pole P216577 to P296561 which was reflected in the spreadsheet. The response also clarified that two separate design packages consisting of a 4-way switch and two sets of 900 amp disconnects were installed at location H108454.

Although the sampling data was validated and the IE verified that the utility installed nine switches, SDG&E had a shortfall of one resulting in an initiative validation rate of 90%, outside of the 95% threshold set forth by Energy Safety. SDG&E did overcomplete install of switches in 2024, therefore over the 2023-2025 WMP cycle, the cumulative target goal was met. Based on this analysis, the documentation provided, and sampling verification, the IE has not validated this initiative.

Table 9: PSPS Sectionalizing

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR019 Response	Initiative Validation Rate
10 Switches	9 Switches	9 Switches	9 Switches	90%

WMP.463 – 8.1.2.8.1 – Advanced Protection – Focus & Field Verifiable

Advanced protection encompasses technologies, including high-impedance fault detection, sensitive earth-fault relays, and faster-trip schemes, that improve fault detection and shorten clearing times, thereby reducing ignition risk. The 2023 to 2025 WMP set a 2025 completion target of 8 circuits, with a stated risk reduction goal of 0.92 percent. Per SDG&E's 2025 Q4 QDR, provided in response to the front-loaded data request, SDG&E reported completing seven (7) circuits with advanced protection installations against the eight (8) circuit WMP target. The 2025 EC AIR, dated April 1, 2026, also reports seven (7) circuits.

Because reporting is at the circuit level while scope is implemented across multiple poles per circuit, the IE issued DR020 to obtain pole level installation details and conducted a SME interview under DR020.b on May 22, 2026. During the interview, SDG&E described the components of the advanced protection scheme, including line reclosers, line monitors, control cabinets, microprocessor-based relays, and Real-Time Automation Controllers (RTACs) communicating between field devices and substation infrastructure.

Figure 4:
Example of Advanced Protection Field Images



SDG&E provided pole level data for 62 poles across the 7 reported circuits (C67, C79, C214, C356, C448, C973, and C1234), with C221 delayed due to permitting. The IE field sampled 54 installations across all 7 circuits using random sampling and ground inspections, supported by geo-referenced photographs, to confirm pole identification tags and GPS coordinates against the as-built and the DR020 pole list. The IE observed the following exceptions:

Circuit 67: Of the C67 poles sampled by the IE, two (2) poles were observed with the SCADA cross-arm, bracket, and conduit installed, but no SCADA equipment present. The as-built documentation for one (1) of these two (2) poles indicates that installation of the SCADA equipment is pending easement acquisition.

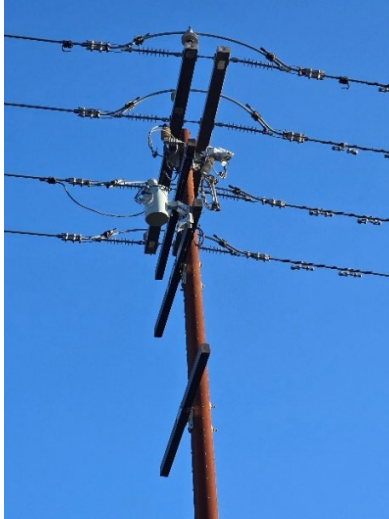
Circuit 448: Of the C448 poles sampled by the IE, four (4) poles were observed with incomplete SCADA installation as follows:

- 2 poles: SCADA cross-arm, bracket, and conduit installed; no SCADA equipment present.
- 1 pole: SCADA cross-arm installed; no SCADA equipment present.
- 1 pole: As-built drawings indicate the previously designed SCADA equipment was to be replaced with a repeater in its place RFI #27. No repeater was observed on the pole at the time of field verification.

Under DR020.b, SDG&E stated that a circuit is considered complete for WMP.463 reporting when all line-side construction at every pole is complete, that SCADA equipment is installed by a separate work group, and that the project team was not aware at the 2025 EC AIR submission that SCADA equipment remained outstanding. At all other sampled poles, the IE observed completed

pole top construction with SCADA equipment installed, consistent with the as-built. Consistent with Energy Safety methodology, installation without commissioning does not satisfy the risk-reduction requirement, so the six poles are treated as not validated at the installation level.

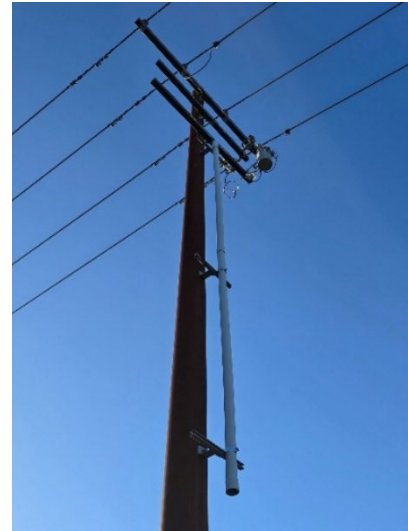
Figure 5:
Example of Advanced Protection Partial Installation on C448
Field Images



P43595 C448 – Cross-Arm
Installed without SCADA
Equipment



**P43751 C448 – Cross-Arm,
Brackets, and Conduit Installed**
without SCADA Equipment



**P43927 C448 – Cross-Arm,
Brackets, and Conduit Installed**
without SCADA equipment

SDG&E reported completing 7 of the 8 targeted circuits, with a status of Delayed. The reported total is below the WMP target, and IE field verification additionally identified six sampled installation points where line-side construction was complete, but the associated SCADA equipment was not present or commissioned. On both bases, the IE has not validated this initiative. The IE recomputed the Sample Validation Rate at the installation level at 89 percent (48 of 54 sampled installation points fully verified) and the Initiative Validation Rate at 78 percent. Because reported progress is stated at the circuit level while each reported complete circuit depends on completed and commissioned installation points along it, the installation level Sample Validation Rate is applied to the circuit level progress claim, so the 78 percent rate reflects both the seven of eight circuit completion and the installation level shortfall on the circuits counted as complete.

Table 10: Advanced Protection

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR020 Response	Initiative Validation Rate
8 circuits	7 circuits	7 circuits	7 Circuits	88%

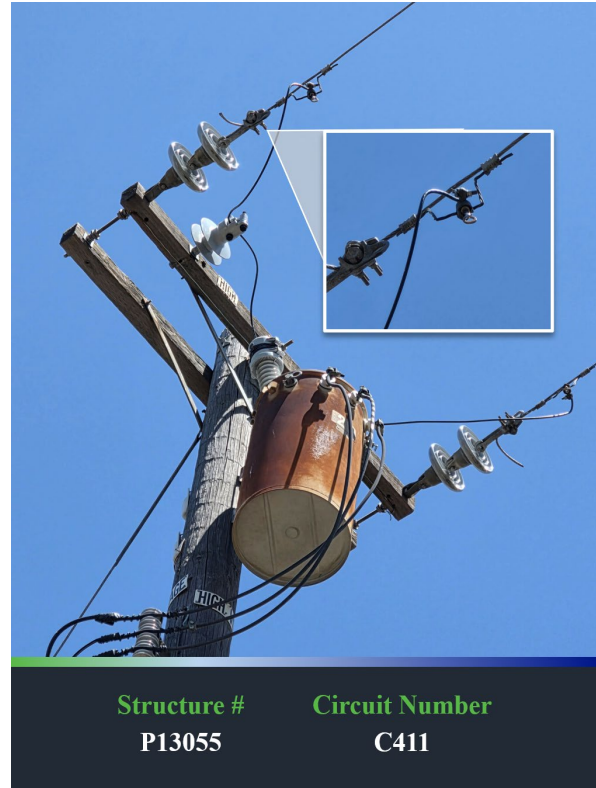
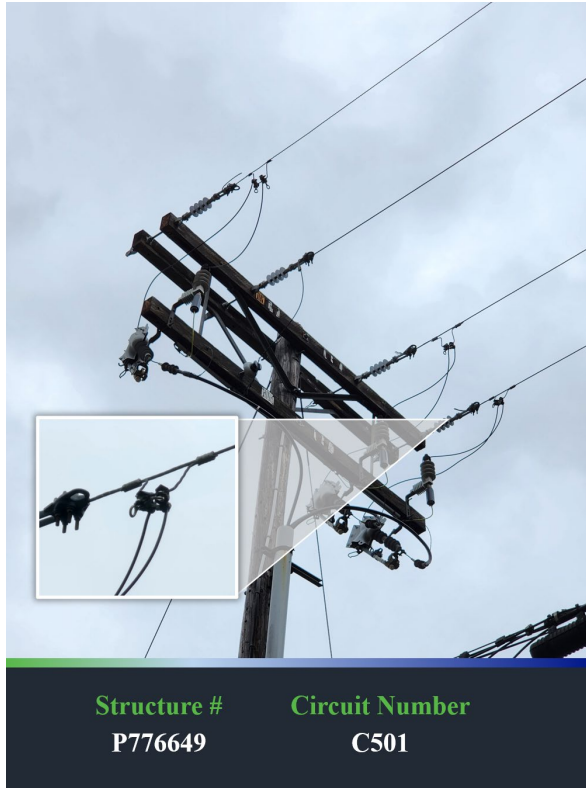
WMP.464 – 8.1.4.5 – Hotline Clamps Maintenance, Repair, and Replacement – Focus & Field Verifiable

This initiative reduces the risk of ignition from connector failures by maintaining, repairing, or replacing connectors, including hotline clamps, on overhead structures in the HFTD. The 2023 to 2025 WMP set a 2025 target of 950 hotline clamps, with a stated risk reduction goal of 0.13 percent. SDG&E filed a Petition to Amend requesting a reduction of this target; Energy Safety denied the reduction, so the 950-unit target stands.

Per SDG&E's 2025 Q4 QDR, provided in response to the front-loaded data request and DR003, SDG&E reported replacing 110 hotline clamps against the 950 hotline clamp WMP target. The 2025 EC AIR, dated April 1, 2026, also reports 110 hotline clamps and classifies the initiative as Delayed.

The IE conducted field verification on a random sample of 78 of the 110 reported hotline clamp replacement locations using GIS data submitted in response to the front-loaded data request, capturing geo-referenced photographs at each site. Field assessments were performed using guidance from the California Power Line Fire Prevention Guide, 2021 Edition, distinguishing exempt equipment installations (Pages 101–108, Figures B-54 through B-74) from non-exempt installations (Pages 68–70, Figures NE-29 through NE-37). For illustrative examples, please refer to Figure X: Example Hotline Clamp Replacement Field Images.

Figure 6:
Example of Hotline Clamp Replacement Field Images



During field verification, the IE confirmed:

- Hotline clamps were properly removed and replaced with compliant connectors.
- Structure locations aligned accurately with the reported coordinates.

Field assessments of this initiative were reviewed for workmanship and accuracy of the records provided. While the sample validation rate meets the 100% threshold on the work SDG&E reported as completed, SDG&E's 2025 AIR classifies this initiative as Delayed, reflecting that only 110 of the 950 targeted hotline clamps were replaced in 2025. Because the Initiative Validation Rate falls below the 95% threshold and SDG&E did not meet the 2025 WMP target, the IE has not validated this initiative.

Table 11: Hotline Clamps Maintenance, Repair, and Replacement

2025 Target	2025 EC AIR	2025 Q4 QDR	DR003 Response	Initiative Validation Rate
950 Hotline Clamps	110 Hotline Clamps	110 Hotline Clamps	110 Hotline Clamps	12%

WMP.466 – 8.1.2.11.3 Generator Grant Program – Non-Focus and Non-Field Verifiable

WMP.466 outlines SDG&E’s objective to continue to provide portable backup power to focus on enhancing resiliencies for all customers who reside in Tiers 2 and 3 to enable access to electricity for medical devices and critical appliances during a PSPS event. These portable backup battery units provide solar charging capacity to customers which leverages cleaner, renewable generator options. In reference to table 8-1 and section 8.1.2.11.3, SDG&E does not provide a specific target for 2025, but rather a broader objective to continue to provide this program to customers. SDG&E did not set a risk reduction goal for this initiative.

According to the 2025 Q4 QDR, SDG&E stated that customer eligibility lists are updated and provided to vendors on a monthly basis. In addition, their contractor conducted scheduling, delivery, and product training to all eligible customers who were enrolled in the program. According to the 2025 EC AIR, SDG&E stated that the qualitative milestones for this program were achieved in 2025 and that there is no QA/QC associated with this program.

In support of WMP 466, SDG&E was asked to provide program verification documentation. The utility responded with a document titled “IE DATA REQUEST: IE-2026-DR003, SDG&E RESPONSE”. This document outlines annual targets as well as actual progress for all quarters of 2025. The document concluded with the following statement: *“SDG&E’s Generator Grant Program retired in 2025, and the third-party implementer is currently preparing the final GGP Annual Report, which is due no later than April 15, 2026. A copy of the GGP Annual Report will be provided upon receipt.”*

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 12: Generator Grant Program

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Continue to provide portable backup power solutions to vulnerable, electricity dependent customers.	Qualitative Milestones Achieved	Eligibility List Updates/ Customer Training	Portable Backup Power Solutions Provided	100%

WMP.467 – 8.1.2.11.4 Generator Assistance Program – Non-Focus and Non-Field Verifiable

WMP.467 outlines SDG&E’s objective to continue rebates on portable backup power solutions to customers. SDG&E did not set a risk reduction goal for this initiative. As outlined in section 8.1.2.11.4, the program focuses on customers who reside in HFTD Tier 2 and 3 areas. Eligible customers receive program materials where they are directed to an online portal to verify account information and learn more about the program. If verified, the program offers a \$300 rebate to

customers for a portable generator. Customers who are enrolled in the California Alternate Rates for Energy (CARE) program are eligible for a rebate of \$450 for a portable generator. In reference to table 8-1 and section 8.1.2.11.4, SDG&E does not provide a specific target for 2025, but rather a broader objective to continue to provide this program to customers.

According to the 2025 Q4 QDR, SDG&E stated that customer eligibility lists are updated and provided to vendors on a monthly basis. In addition, final year-end marketing communications were distributed on December 16, 2025. According to the 2025 AIR, SDG&E stated that the qualitative milestones for this program were achieved in 2025 and that there is no QA/QC associated with this program.

In support of WMP 466, SDG&E was asked to provide program verification documentation. The utility responded with a document titled “IE DATA REQUEST: IE-2026-DR003, SDG&E RESPONSE” as well as a document titled “2025 GAP End of Program Report.pdf”. The first document outlines annual targets as well as actual progress for all quarters of 2025. The second document outlines and summarizes the program’s achievements.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 13: Generator Assistance Program

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Continue to provide rebates on portable backup power solutions to customers who experience PSPS.	Qualitative Milestones Achieved	Eligibility List Updates/ Marketing Communications Distributed	Rebate Support Provided	100%

WMP.468 – 8.1.2.11.2 Standby Power (Fixed Power Backup) – Non-Focus and Non-Field Verifiable

WMP.468 outlines SDG&E’s Standby Power Program, which is an umbrella program that includes several other programs, targets customers and communities that will not directly benefit from other grid hardening programs. These customers typically reside in the backcountry and are generally distanced from one another. Due to these factors, traditional grid hardening initiatives will not reduce PSPS exposure. Several programs exist under this initiative such as the Fixed Back Power (FBP) Program which targets residential customers, an FBP Program targeting commercial customers, and the Mobile Home Park Resilience Program (MHRP) which targets mobile home park clubhouses. SDG&E provided a 19.9105% risk reduction goal for this initiative. In the 2025 EC AIR Table 5-1, SDG&E stated that the risk reduction was not achieved, falling short with an actual risk reduction rate of 17.46%. SDG&E stated that since the 2025 risk reduction is calculated

as the ratio of the 2025 work completed to the 3-year total, the lower 3-year denominator results in a lower calculated risk reduction for 2025.

According to the 2025 Q4 QDR, SDG&E stated that 88 generators were provided and stated a “completed” status for this initiative. According to the 2025 AIR, SDG&E stated that the projected target of 89 generators “was substantially met” and that installation of the remaining project has been completed, but that projects are waiting for third party final inspection and interconnection agreements for generators to be considered used and useful.

In support of WMP 468, SDG&E was asked to provide a list of all the generators provided to customers in 2025. The utility responded by submitting an Excel spreadsheet titled “FixedBackupPower_Confidential” which shows 88 assets with all associated details (i.e., Asset ID, Grid Hardening Location or Address, Status, etc.). Upon review of this data, the IE confirmed that 88 of these assets had an end date in 2025, confirming installation in the applicable implementation year.

The IE reviewed a sample of 54 battery installation work orders which consisted of 42 from Tier 2-HFTD and 12 from Tier 3-HFTD. These work orders contained redacted personal information but contained pertinent data regarding the asset being installed; however, the reports did not contain a reference to the HFTD. The IE cross referenced the GhID number in the reports to the one provided in the frontload data and verified that the proper HFTD reports were provided.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 14: Standby Power (Fixed Power Backup)

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR024 Response	Initiative Validation Rate
89 Generators	88 Generators	88 Generators	88 Generators	99%

WMP.473 – 8.1.2.2 – Strategic Undergrounding – Non-Focus & Field Verifiable

Strategic undergrounding relocates overhead distribution to underground in the highest-risk segments, removing exposure to overhead ignition. The 2023 to 2025 WMP set a 2025 target of 28 circuit miles and a stated risk-reduction goal of 2.86 percent. SDG&E filed a Petition to Amend requesting a reduction from 125 to 28 miles; Energy Safety approved the amendment, establishing 28 circuit miles as the controlling target.

Per SDG&E's 2025 Q4 QDR, provided in response to the front-loaded data request, SDG&E reported completing 32.56 circuit miles of strategic undergrounding against the 28 circuit mile WMP target. The 2025 EC AIR, dated April 1, 2026, reports 32.57 circuit miles of strategic undergrounding.

The IE conducted field verification for a random sample of 21 circuit miles from the completed undergrounding projects. Field assessments included foot patrols with GPS-enabled, high-

resolution handheld cameras and vehicle-mounted 360° cameras with GPS data-logging capabilities to verify installations against historical Google Streetview imagery (2019–2025) and as-built construction drawings. For illustrative examples, please refer to Figure 7: Example Strategic Undergrounding Field Images.

Figure 7:
Example of Strategic Undergrounding Field Images



SDG&E reported completing 32.57 circuit miles against the 28-mile target, resulting in an Exceeded status. Field results were consistent with the reported value, and the IE confirmed that the WMP target was met. Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 15: Strategic Undergrounding

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR025 Response	Initiative Validation Rate
28 Circuit Miles	32.57 Circuit Miles	32.56 Circuit Miles	32.57 Circuit Miles	116%

WMP.475 – 8.1.2.5.1 – Distribution Overhead System Hardening (Traditional) – Focus & Field Verifiable

Traditional distribution overhead system hardening, distinct from covered conductor, includes pole class upgrades, hardware replacements such as cross arms, insulators, and dead ends, and structural reinforcement to improve resilience to weather and contact events. The 2023 to 2025 WMP set a 2025 completion target of 0 circuit miles for this initiative. SDG&E did not provide a quantified risk reduction goal.

Per SDG&E's 2025 Q4 QDR, provided in response to the front-loaded data request, SDG&E reported completing 0.11 circuit miles of traditional distribution overhead hardening against the 0 circuit mile WMP target. The 2025 EC AIR, dated April 1, 2026, also reports 0.11 circuit miles.

The IE assessed the full 0.11 miles using GIS data and as-built construction documents, with field assessments conducted on foot using GPS-enabled, high-resolution handheld cameras and comparisons against historical Google Street View imagery from 2019 to 2025. The IE confirmed that hardening was complete and that the installation spans aligned with the reported GIS coordinates.

Figure 8:
Example of Traditional Distribution Hardening Field Images



P112295 – Pole Tag



P112295 – Pole Hardening

SDG&E reported completing 0.11 circuit miles against the 0-mile target, a status of Completed. The observed work was consistent with the reviewed records and applicable verification criteria. Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 16: Distribution Overhead System Hardening (Traditional)

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
0 Circuit Miles	0.11 Circuit Miles	0.11 Circuit Miles	0.11 Circuit Miles	N/A

WMP.478 – 8.1.3.1 Distribution Overhead Detailed Inspections – Non-Focus and Non-Field Verifiable

GO 165 establishes inspection cycles and record-keeping requirements for utility distribution equipment. In general, utilities must patrol once a year in urban areas, and HFTD Tier 2 and Tier 3. In addition to patrols, utilities must conduct detailed inspections at a minimum of every 5 years for overhead structures and sub-equipment. The corrective work resulting from detailed inspections enables the infractions to be addressed before developing into issues.

The 2023-2025 WMP set a target of 13,275 inspections completed. SDG&E provided a risk reduction goal of 1.94%. In the 2025 EC AIR Table 5-1, SDG&E stated that the risk reduction was achieved. SDG&E claimed 17,950 detailed inspections were completed in their 2025 AIR. Data provided in the frontload request indicates that 17,950 inspections were completed.

The IE requested documentation of completion for a sample of these detailed inspections in DR027, 28 detailed inspections in HFTD Tier 3 and seven (7) in HFTD Tier 2. SDG&E responded by providing a spreadsheet with 38 records. These records include all the information from inspection reports including Facility ID, HFTD, Description, Condition Code, and WMP Finding.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 17: Distribution Overhead Detailed Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR027 Response	Initiative Validation Rate
13,275 inspections completed	17,950 inspections completed	17,950 inspections completed	17,950 inspections completed	135%

WMP.479 – 8.1.3.2 Transmission Overhead Detailed Inspections – Focus and Non-Field Verifiable

WMP.479 outlines SDG&E's program to perform territory-wide inspections of its electrical transmission system. Internal linemen visit every structure scheduled for the year, looking at all components of the structure and conductor. An assessment of the assets' current and future maintenance requirements is made and an internal severity code is assigned to ensure that the condition is properly prioritized.

The 2023-2025 WMP set a target of 2,479 inspections with a 0.9580% risk reduction goal. In the 2025 EC AIR Table 5-1, SDG&E stated that the risk reduction was not achieved, falling short with an actual risk reduction rate of 0.81%. Although SDG&E met the target for this initiative, the number of findings, particularly critical issues, was lower than anticipated. Critical findings are the primary driver of risk reduction, resulting in a lower risk reduction number. According to the 2025 Q4 QDR and 2025 AIR, SDG&E claimed 2,184 inspections were completed and noted a status of “delayed” with the following statement: *“No corrective actions required. 3 year target scope exceeded by 210 inspections. 3 year scope completion is 103%. All remaining inspections remain current under CAISO’s 3 year inspection cycle requirement.”*

In support of WMP.479, SDG&E was asked to provide a list of all completed transmission overhead detailed inspections completed in 2025. The utility responded by submitting an Excel spreadsheet entitled “SDGE_AssetInspectionPoint_2025_Combined” which shows 137,849 points with associated details. This spreadsheet was further filtered to capture only WMP section 8.1.3.2, which then showed 2,184 inspections.

The IE reviewed a sample of 130 inspection reports which consisted of 13 from non-HFTD, 26 from Tier 2-HFTD and 91 from Tier 3-HFTD. The IE was able to cross reference the inspection data from the sampling attachment to the frontload data received and all pertinent data of conditions found and remediation performed was clearly documented. Although the documentation reviewed was complete, SDG&E did not meet the 2025 goal set forth in the 2023-2025 WMP.

Based on this analysis, the documentation provided, and sampling verification, the IE has not validated this initiative.

Table 18: Transmission Overhead Detailed Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR028 Response	Initiative Validation Rate
2,479 Inspections	2,184 Inspections – “Projected Target Not Met”	2,184 Inspections	2,184 Inspections	88%

WMP.481 – 8.1.3.3 Distribution Infrared Inspections – Non-Focus and Non-Field Verifiable

Per section 8.1.3.1 of the WMP, the WMP.481 initiative utilizes infrared technology to examine the radiation emitted by connections to determine if there are potential issues with a connection before failure. Thermographers perform the ground inspection to capture and assess thermal imagery that may indicate an abnormality on the system. Findings are documented and required repair work is tracked through completion. SDG&E did not provide a risk reduction goal in the 2023-2025 WMP, however, a risk reduction target of 0.4% was outlined in the 2025 EC AIR. In the 2025 EC AIR Table 5-1, SDG&E stated that the risk reduction was achieved.

The initiative target for 2025 was 300 inspections. According to SDG&E's 2025 EC AIR, the utility performed 302 inspections. For the frontload data request, the utility provided an Asset Inspection Point spreadsheet recording the 302 inspections performed for the year. This document contained inspection details such as inspection date, recorded findings, HFTD classification, and asset ID.

The IE requested 31 sampling items to validate this initiative. SDG&E provided a written response stating that *“Inspection reports are only generated when conditions are found. As no thermal anomalies were found in the sample requested, no reports were generated”*. In the sampling spreadsheet provided, a total of three-line items displayed a “Condition Code” indicating damage. Each item had an associated finding notification number and findings notification type. Based on SDG&E's written response, all other 28 samples requested identified no findings as no report was generated.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 19: Distribution Infrared Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR029 Response	Initiative Validation Rate
300 Inspections	302 Inspections	302 Inspections	302 Inspections	101%

WMP.482 – 8.1.3.4 Transmission Infrared Inspections – Focus and Non-Field Verifiable

WMP.482 outlines SDG&E's program to utilize infrared technology to examine radiation emitted by connections to determine if there are potential issues with a connection before failure. Infrared patrols on transmission lines are most effective during higher loading conditions; therefore, they typically begin in the warmer months prior to San Diego's wildfire season. As corrosion, rust, and other structural impacts may cause hotspots on structures and equipment, all energized transmission lines are included in the scope of this program. Transmission infrared inspections are currently completed on an annual basis for all energized tielines, including those in the HFTD. Non-routine infrared inspections may be performed prior to weather events based on meteorological data.

The 2023-2025 WMP set a target of 7,331 inspections with a 0.1848% risk reduction goal. In the 2025 EC AIR Table 5-1, SDG&E stated that the risk reduction was achieved. According to the 2025 Q4 QDR and 2025 AIR, SDG&E claimed 6,976 inspections were completed.

In support of WMP.482, SDG&E was asked to provide a list of all completed transmission infrared inspections completed in 2025. The utility responded by submitting an Excel spreadsheet titled “SDGE_AssetInspectionPoint_2025_Combined” which shows 137,849 points with associated details. This spreadsheet was further filtered to capture only WMP section 8.1.3.4, which then showed 6,976 inspections.

The IE reviewed a sample of 136 inspection reports which consisted of 13 from non-HFTD, 27 from Tier 2-HFTD and 96 from Tier 3-HFTD. In data request DR030, the utility was asked to provide PDF reports for the 136 inspections. The utility provided an Excel spreadsheet entitled “WMP.482 Sampling Attachment” which contained inspection information for 136 inspections. The IE was able to cross reference the inspection data from the sampling attachment to the frontload data received and all pertinent data of conditions found and remediation performed was clearly documented. Although SDG&E did not achieve the 2025 target of 7,331 inspections, the 6,976 completed inspections in conjunction with all samples being validated resulted in a 95% initiative validation rate, which is within the Energy Safety threshold for initiative validation.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 20: Transmission Infrared Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR030 Response	Initiative Validation Rate
7,331 Inspections	6,976 Inspections	6,976 Inspections	6,976 Inspections	95%

WMP.483 – 8.1.3.5 Distribution Wood Pole Intrusive Inspections – Non-Focus and Non-Field Verifiable

WMP.483 addresses GO 165 which requires all wood poles over 15 years of age to be intrusively inspected within 10 years and all poles which previously passed intrusive inspection to be inspected intrusively again on a 20-year cycle. Distribution wood pole intrusive inspections are performed on a 10-year cycle. An intrusive inspection typically involves an excavation around the pole base and/or a sound and bore of the pole at groundline. Depending on the cavities found or the amount of rot observed, an estimate of the remaining pole strength is determined utilizing industry-wide standards. Depending on the severity of the deterioration, the pole either passes inspection with greater than 80 percent strength remaining or is replaced. The WMP has a risk reduction goal of 0.03% for this initiative. In the 2025 EC AIR Table 5-1, SDG&E stated that the risk reduction was achieved.

The initiative target for 2025 was 344 inspections. According to SDG&E's 2025 annual EC AIR, the utility completed 1,478 inspections. For the frontload data request, the utility provided an Asset Inspection Point spreadsheet recording 1,478 inspections performed for the year. This document contained inspection details such as inspection date, recorded findings, HFTD classification, and pole ID.

The IE requested 34 sampling items to validate this initiative. SDG&E provided a spreadsheet recording with 42-line items recorded across 34 unique pole IDs. The sampling data included entries for inspection date, pole details such as material, height, and species, pole status such as leaning, insect damage, chipped, and a pole status.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 21: Distribution Wood Pole Intrusive Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR031 Response	Initiative Validation Rate
344 Inspections	1,478 Inspections	1,478 Inspections	1,478 Inspections	430%

WMP.488 – 8.1.3.8 Distribution Overhead Patrol Inspections – Non-Focus and Non-Field Verifiable

WMP.488 outlines SDG&E's program to patrol their systems annually in HFTD Tier 2 and Tier 3 and in urban areas. Patrol inspections in rural areas outside of the HFTD are required once every 2 years; however, as a long-standing practice, SDG&E claims to perform patrol in sections in all areas on an annual basis.

The 2023-2025 WMP set a target of 86,535 inspections with a 4.3679% risk reduction goal. In the 2025 EC AIR Table 5-1, SDG&E stated that the risk reduction was not achieved, falling short with an actual risk reduction rate of 0.82%. Although SDG&E met the target for this initiative, the number of findings, particularly critical issues, was lower than anticipated. Critical findings are the primary driver of risk reduction, resulting in a lower risk reduction number. According to the 2025 Q4 QDR and 2025 AIR, SDG&E claimed 86,040 inspections were completed, stating a 99% completion rate.

In support of WMP.488, SDG&E was asked to provide a list of all distribution overhead patrol inspections completed in 2025. The utility responded by submitting an Excel spreadsheet entitled "SDGE_AssetInspectionPoint_2025_Combined" which shows 137,849 points with associated details. This spreadsheet was further filtered to capture only WMP section 8.1.3.8, which then showed 86,040 inspections.

The IE reviewed a sample of 35 inspection reports which consisted of 6 from Tier 2-HFTD and 27 from Tier 3-HFTD. In data request DR032, the utility was asked to provide PDF reports for the 35 sample inspections. The utility provided an Excel spreadsheet entitled "SDGE DR Response_IE-

SDG&E_DR032_WMP.488” which contained inspection information for 35 inspections. The IE was able to cross reference the inspection data from the sampling attachment to the frontload data received and all pertinent data of conditions found, and remediation performed was clearly documented. Although SDG&E did not achieve the 2025 target of 86,535 inspections, the 86,040 completed inspections in conjunction with all samples being validated resulted in a 99% initiative validation rate, which is within the Energy Safety threshold for initiative validation.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 22: Distribution Overhead Patrol Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR032 Response	Initiative Validation Rate
86,535 Inspections	86,040 Inspections	86,040 Inspections	86,040 Inspections	99%

WMP.489 – 8.1.3.9 Transmission Overhead Patrol inspections – Non-Focus and Non-Field Verifiable

WMP.489 outlines SDG&E’s program to conduct visual patrols by helicopter on overhead tielines, including those in HFTD. These patrols provide an overhead view of structures and components to identify issues such as cracked pole tops or rust/corrosion and large issues that can pose a fire risk.

The 2023-2025 WMP set a target of 7,533 inspections with a .0298% risk reduction goal. In the 2025 EC AIR Table 5-1, SDG&E stated the goal was 0.01% and was achieved with a 0.01% reduction rate. According to the 2025 Q4 QDR and 2025 AIR, SDG&E claimed 7,263 inspections were completed, stating a 96% completion rate.

In support of WMP.489, SDG&E was asked to provide a list of all transmission overhead patrol inspections completed in 2025. The utility responded by submitting an Excel spreadsheet entitled “SDGE_AssetInspectionPoint_2025_Combined” which shows 137,849 points with associated details. This spreadsheet was further filtered to capture only WMP section 8.1.3.9, which then showed 7,263 inspections.

The IE reviewed a sample of 34 inspection reports which consisted of 4 from non-HFTD, 6 from Tier 2-HFTD and 24 from Tier 3-HFTD. In data request DR033, the utility was asked to provide PDF reports for the 34 sample inspections. The utility provided an Excel spreadsheet entitled “WMP.489 Sampling Attachment” which contained inspection information for 34 inspections. The IE was able to cross reference the inspection data from the sampling attachment to the frontload data received and all pertinent data of conditions found and remediation performed was clearly documented. Although SDG&E did not achieve the 2025 target of 7,533 inspections, the 7,263 completed inspections in conjunction with all samples being validated resulted in a 96% initiative validation rate, which is within the Energy Safety criteria for initiative validation.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 23: Transmission Overhead Patrol inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR033 Response	Initiative Validation Rate
7,533 Inspections	7,263 Inspections	7,263 Inspections	7,263 Inspections	96%

WMP.491 – 8.1.6.2 Quality Assurance/Quality Control of Distribution Detailed Inspections – Non-Focus and Non-Field Verifiable

QA/QC audits for distribution overhead detailed inspections enhance reliability by verifying inspection accuracy and ensuring compliance with established standards. In the 2023-2025 WMP, Section 8.1.6.2, SDG&E committed to assessing 50% of findings identified during inspections and 5% of total inspections completed under initiative WMP.478. In response to DR034.b, SDG&E confirmed this target methodology. In the frontload data, a spreadsheet was provided that listed all 17,950 inspections completed by SDG&E under initiative WMP.478. 413 findings were identified across three levels. Based on this data, SDG&E’s numerical target for WMP.491 should be 1,104 QA/QC audits (5% of 17,950 & 50% of 413).

In support of WMP.491, SDG&E was asked to provide a list of all detailed inspections targeted for QA/QC audits in 2025. The utility responded by submitting an Excel spreadsheet titled “QA/QC_491_032526” which contains 1,078 records with associated details (i.e., Asset ID, HFTD Class, etc.).

The IE requested a sample of 34 QA/QC reports which consisted of 6 from Tier 2-HFTD and 28 from Tier 3-HFTD. In data request DR034, the utility was asked to provide PDF reports for the 34 QA/QC activities. The utility provided an Excel spreadsheet entitled “SDGE DR Response_IE-SDG&E_DR034_WMP.491” which contained information for 25 inspections with QA Auditor, Date Fielded, and Field Audit Results. The IE was able to cross reference the inspection data from the sampling attachment to the frontload data received; however, the sampling data appears to be incomplete as it only contains 25 inspection records as reports for the remaining 8 were noted to not be available.

SDGE’s completion of 1,078 QA/QC audits fell 26 audits short of the outlined target goal (1,104) based on the methodology provided in the WMP. Further, the IE was only able to verify 25 inspection records of the 34 requested from SDG&E. The sample validation rate for this initiative is 74% resulting in a 72% initiative validation rate, outside of the Energy Safety threshold of 95%.

Based on this analysis, the documentation provided, and sampling verification, the IE has not validated this initiative.

Table 24: Quality Assurance/Quality Control of Distribution Detailed Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR034/.b Response	Initiative Validation Rate
5% of WMP.478 Inspections/ Findings 50% of total WMP.478 inspections 1,104 Inspections	59%	1,078	1,078 Inspection Records	72%

WMP.492 – 8.1.3.11 Substation Patrol Inspections – Non-Focus and Non-Field Verifiable

WMP.492 identifies substation equipment deterioration to make repairs or replacements before a failure occurs, as mandated by GO 174. The program is conducted primarily for reliability; however, it also provides incidental wildfire mitigation benefits within the HFTD and the WUI. The Substation Inspection and Maintenance Program schedules routine inspections at recurring cycles. These inspections consist of a monthly or bimonthly patrol inspection where equipment is inspected and problems, such as oil leaks, are identified. When issues are identified during an inspection, corrective work orders are opened with a severity level of either immediate (within 7 days) or within the next 12 months. SDG&E did not provide a risk reduction goal for this initiative.

The initiative target for 2025 was 384 inspections. According to SDG&E's 2025 EC AIR, the utility performed 391 inspections. For the frontload data request, the utility provided an Asset Inspection Point spreadsheet recording the inspections performed for the year. This document contained inspection details such as inspection date, recorded findings, HFTD classification, and asset ID.

The IE requested 32 sampling items to validate this initiative. SDG&E provided 31 patrol inspection records. The inspection records focused on substation equipment such as VacBreakers, GasBreakers, Batteries, StationGeneral, and ReactorAirCoreOpenRack. Each piece of equipment contained general information such as location, equipment number, location, type, and model, as well as inspection parameters with the new value and last value recorded, and the date recorded.

The IE identified no issues or discrepancies during this review. Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 25: Substation Patrol Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR035 Response	Initiative Validation Rate
384 Inspections	391 Inspections	391 Inspections	391 Inspections	102%

WMP.543 – 8.1.2.5.2 – Transmission Overhead Hardening – Non-Focus & Field Verifiable

Transmission overhead system hardening covers tower or pole upgrades, insulator replacements, and hardware refits to reduce the risk of transmission ignition and improve resilience. The 2023 to 2025 WMP set a 2025 completion target of 2 miles and a stated risk-reduction goal of 0.06 percent. SDG&E filed a Petition to Amend, reducing the target from 4.64 to 2 miles, which Energy Safety approved, establishing 2 miles as the controlling target.

Per SDG&E's 2025 Q4 QDR, provided in response to the front-loaded data request, SDG&E reported completing 2 miles of Transmission Overhead hardening work against the 2 mile WMP target. The 2025 EC AIR, dated April 1, 2026, also reports 2 miles.

To verify completion of the initiative, the IE relied on the front-loaded data request response, which included the SDG&E 2025 Combined QDR Geodatabase containing spatial data for the Transmission Overhead Hardening. In addition, the response to DR044.b provided corresponding as-built information for this initiative.

The IE field sampled all 2 miles of the Transmission Overhead Hardening work included in the 2025 hardening scope. Field verification was conducted using ground inspections supported by geo-referenced photographs and as-builts provided by SDG&E. For each sample location, the IE confirmed structure identification, insulator string replacement consistent with design, conductor attachment hardware and dampers, foundation integrity, and workmanship consistent with industry standards.

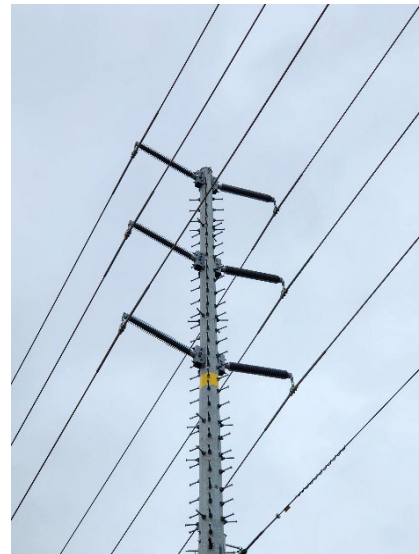
Figure 9:
Example of Transmission Overhead Hardening Field Images



Z138154 C675



Z296224 C675



Z296218 C675

SDG&E reported completing 2-miles against the 2-mile target, a status of Completed. The IE field sampled the full 2-mile scope and confirmed completion consistent with the as-built. Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 26: Transmission Overhead Hardening

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
2 Miles	2 Miles	2 Miles	2 Miles	100%

WMP.545, 8.1.2.5.2, Distribution Underbuild – Focus & Field Verifiable

Hardening of transmission structures that carry distribution underbuild addresses dual-voltage exposure on shared structures and replaces or reinforces structures to support both circuits. The 2023 to 2025 WMP set a 2025 completion target of 2 miles, with a stated risk reduction goal of 0.01 percent. Per SDG&E's 2025 Q4 QDR, provided in response to the front-loaded data request, SDG&E reported completing zero miles of hardening work against the 2-mile hardening WMP target. The 2025 EC AIR, dated April 1, 2026, also reports zero miles.

In response to DR045, SDG&E confirmed that construction was planned at the identified underbuild locations, but environmental restrictions and adverse weather in 2025 delayed the underbuild work (setting of pole bases and tops) until January 2026. Based on this analysis and the documentation provided, the IE has not validated this initiative.

The IE notes for context that the 2023 to 2025 cycle target was exceeded, with 17.33 miles in 2023 and 7.00 miles in 2024, totaling 24.33 miles against a cycle target of 9.9 miles; the 2025 annual increment was not completed.

Table 27: Transmission Overhead Hardening (Distribution Underbuild)

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR045 Response	Initiative Validation Rate
2 Miles	0 Miles	0 Miles	0 Miles	0%

WMP.549 – 8.1.2.8.3 – Distribution Communications Reliability Improvements (DCRI) – Focus & Field Verifiable

The Distribution Communications Reliability Improvements (DCRI) program enhances communication network reliability to support wildfire mitigation initiatives requiring continuous and reliable communication, including SCADA, advanced protection, and grid monitoring systems. SDG&E filed a Petition to Amend, reducing the target from 42 to 5 stations, which

Energy Safety approved, establishing 5 stations as the controlling target. SDG&E did not provide a quantified risk reduction goal.

Per SDG&E's 2025 Q4 QDR, provided in response to the front-loaded data request, SDG&E reported installing 4 base stations against the 5 base station WMP target. The 2025 EC AIR, dated April 1, 2026, also reports 4 base stations and classifies the initiative as Delayed.

The IE conducted field verification at all 4 completed base station installations using GIS data submitted in response to the front-loaded data request. Field assessments were conducted using ground inspections supported by geo-referenced photographs to verify installations against the records provided. For each location, the IE confirmed structure identification, antenna and equipment mounting consistent with design, communication cabinet placement, and workmanship consistent with industry standards. For illustrative examples, please refer to Figure 10: Example Distribution Communications Reliability Improvements Field Images.

Figure 10:
Example of Distribution Communication Reliability
Improvements Field Images



Creelman Substation



P295239

SDG&E reported completing 4 of the 5 targeted stations, with the status set to Delayed. All 4 completed stations were field verified, but the reported total is below the WMP target, resulting in an Initiative Validation Rate of 80 percent. Based on this analysis and the documentation provided, the IE has not validated this initiative

Table 28: Distribution Communications Reliability Improvements (DCRI)

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
5 Base Stations	4 Base Stations	4 Base Stations	4 Base Stations	80%

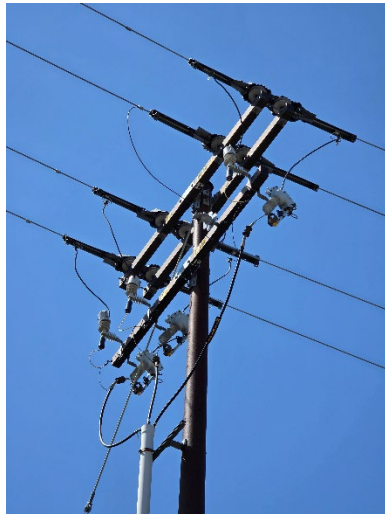
WMP.550 – 8.1.4.6 – Lightning Arrester Removal and Replacement – Focus & Field Verifiable

The Lightning Arrester Replacement program reduces ignition risk by installing CAL FIRE-approved lightning arresters equipped with external devices designed to operate before an arrester overload occurs. As described in the 2023–2025 WMP, SDG&E's 2025 target for this initiative was to replace 90 lightning arresters, with a risk reduction goal of 0.02%. Note that on April 10, 2025, SDG&E filed a Petition to Amend its 2023–2025 Base WMP, and Energy Safety approved the amendment on July 11, 2025, establishing 90 lightning arresters as the 2025 target.

According to SDG&E's 2025 Q4 QDR dated February 1, 2026, the utility replaced 1,015 lightning arresters. In response to the front-loaded data request, SDG&E provided consolidated yearly GIS data identifying the replacement of 1,001 lightning arresters. The 2025 EC AIR, dated April 1, 2026, reports 1,015 lightning arresters and classifies the initiative as Exceeded.

The IE field assessment team utilized the California Power Line Fire Prevention Guide (2021 Edition) to verify exempt equipment installations (Pages 113–114, Figures B-86 through B-88) compared to non-exempt equipment (Pages 63–67, Figures NE-19 through NE-28). For illustrative examples, see Figure 11: Example Lightning Arrester Replacement Field Images.

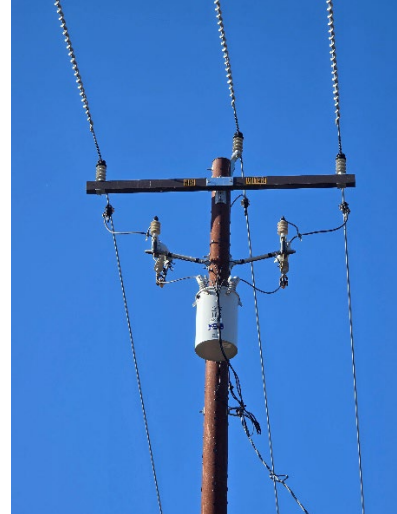
Figure 11:
Example of Lightning Arrester Replacement Field Images



P109254 C35



P101584 C350



P170091 C73

The IE randomly sampled 153 lightning arrester replacement locations from the provided GIS data. Field verification confirmed that all sampled locations complied with the initiative by successfully removing non-exempt equipment and installing exempt equipment.

Field assessments verified workmanship quality and the accuracy of reported information consistent with SDG&E's 2023–2025 WMP descriptions. SDG&E exceeded the 2025 target of 90 lightning arresters. Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 29: Lightning Arrester Removal and Replacement

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
90 Arresters	1,015 Arresters	1,019 Arresters	1,001 Arresters	1128%

WMP.552 – 8.1.3.7 Drone Assessments – Non-Focus and Non-Field Verifiable

Drone assessments support wildfire risk mitigation by efficiently identifying potential issues on distribution structures.

The 2023-2025 WMP set a target of 13,500 inspections. SDG&E provided a risk reduction goal of 13.91% in the WMP. In the 2025 EC AIR Table 5-1, SDG&E stated that the risk reduction was not achieved, falling short with an actual risk reduction rate of 9.47%. Although SDG&E met the target for this initiative, the number of findings, particularly critical issues, was lower than anticipated. Critical findings are the primary driver of risk reduction, resulting in a lower risk

reduction number. Based upon documentation provided in the frontload request, 13,500 drone assessments were completed. This was verified by filtering the WMPActivity column in the data spreadsheet by “Drone assessments”. Data necessary to confirm completion of this initiative was provided in the frontload request.

Sample verification was requested for four (4) non-HFTD, six (6) HFTD Tier 2, and 24 HFTD Tier 3 drone assessments in DR048. The spreadsheet provided in response contains 33 individual records with Facility ID, Audit Results, and Inspection Approved Date. SDG&E also provided two (2) inspection reports for audits that resulted in findings. These reports include latitude and longitude of the asset, date inspected, date approved, material, issues, overhead satellite imagery, details, and comments.

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 30: Distribution Drone Assessments

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR048 Response	Initiative Validation Rate
13,500 Inspections	13,500 Inspections	13,500 Inspections	13,500 Inspections	100%

WMP.555 – 8.1.3.10 Transmission 69kV Tier 3 Visual Inspections – Non-Focus and Non-Field Verifiable

A patrol of all 69 kV structures located in HFTD Tier 3 is performed prior to September 1 each year. These inspections are designed to identify obvious structure problems and hazards prior to fire season. For existing programs, a 5-year historical average of issues found at a given priority level divided by total inspections is calculated. This value is utilized to forecast future years.

The 2023-2025 WMP set a target of 1,632 inspections in 2025. SDG&E provided a risk reduction goal for this initiative of 0.02%. In the 2025 EC AIR Table 5-1, SDG&E stated that the risk reduction was not achieved, falling short with an actual risk reduction rate of 0.00%. Although SDG&E met the target for this initiative, the number of findings, particularly critical issues, was lower than anticipated. Critical findings are the primary driver of risk reduction, resulting in a lower risk reduction number. A total of 1,601 inspections were claimed in the 2025 EC AIR. Data provided in the frontload request as spreadsheets was used to verify these claims. By filtering the UMATID column for this initiative, a total of 1,601 records were returned. This confirms the amount claimed in the 2025 EC AIR.

Sample verification was requested in DR049 and was to consist of 34 inspection reports in HFTD Tier 3. SDG&E does not retain individual inspection reports, only documenting inspection completion date and conditions identified. The spreadsheet provided contained 34 individual records with Asset ID, Segment ID, Inspection Start and End Date, and HFTD Class.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 31: Transmission 69kV Tier 3 Visual Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload and DR049 Response	Initiative Validation Rate
1,632 Inspections	1,601 Inspections	1,601 Inspections	1,601 Inspections	98%

WMP.972 – 8.1.2.10.1 – Avian Protection Program – Focus & Field Verifiable

The Avian Protection Program reduces ignition risks associated with avian-related faults by installing avian guards, perch deterrents, and other protective equipment on overhead distribution structures within the High Fire Threat District (HFTD). As described in the 2023–2025 WMP, SDG&E's 2025 target for this initiative was to install avian protection on 200 poles, with a risk reduction goal of 0.02%. Note that on April 10, 2025, SDG&E filed a Petition to Amend its 2023–2025 Base WMP requesting a reduction in the 2025 avian protection target; Energy Safety denied the requested target reduction in its July 11, 2025 Decision, and the 2025 target remained at 200 poles.

Per SDG&E's 2025 Q4 QDR, provided in response to the front-loaded data request, SDG&E reported installing avian protection on 725 poles against the 200-pole WMP target. The 2025 EC AIR, dated April 1, 2026, also reports 725 poles and classifies the initiative as Exceeded. The front-loaded data request response included GIS data covering 709 structures.

The IE conducted field verification on a random sample of 145 avian protection locations using GIS data submitted in response to the front-loaded data request, capturing geo-referenced photographs at each site. For each sample location, the IE confirmed structure identification, avian protection equipment installation consistent with design, and workmanship consistent with industry standards. For illustrative examples, please refer to Figure 12: Example Avian Protection Field Images.

Figure 12:
Example of Avian Protection Program Field Images



SDG&E reported completing 725 poles against the 200-pole target, indicating Exceeded. The IE confirmed that the WMP target was met. Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 32: Avian Protection Program

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
200 Poles	725 Poles	725 Poles	709 Poles	363%

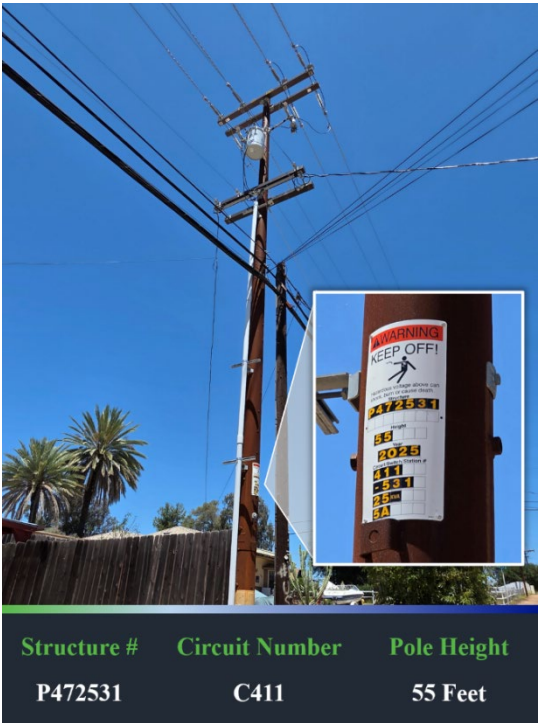
WMP.1189 – 8.1.2.10.2 – Strategic Pole Replacement Program – Non-Focus & Field Verifiable

The Strategic Pole Replacement Program reduces wildfire ignition risk by replacing high-risk, gas-treated poles with a higher potential for failure. As described in the 2023–2025 WMP, SDG&E's 2025 target was to replace 200 poles, with a risk reduction goal of 0.18 percent. Note that on April 10, 2025, SDG&E filed a Petition to Amend its 2023–2025 Base WMP, and Energy Safety approved the amendment on July 11, 2025, establishing 200 poles as the 2025 target.

Per SDG&E's 2025 Q4 QDR, provided in response to the front-loaded data request, SDG&E reported replacing 228 poles against the 200-pole WMP target. The 2025 EC AIR, dated April 1, 2026, also reports 228 poles and classifies the initiative as Exceeded. The front-loaded data request response included GIS data covering 224 structures.

The IE conducted field verification on a random sample of 38 strategic pole replacement locations using GIS data submitted in response to the front-loaded data request, capturing geo-referenced photographs at each site. For each sample location, the IE confirmed structure identification, pole replacement consistent with design, and workmanship consistent with industry standards. For illustrative examples, please refer to Figure 13: Example Strategic Pole Replacement Program Field Images.

Figure 13:
Example of Strategic Pole Replacement Field Images



During field verification, the IE confirmed:

- Strategic pole replacements were completed.
- Structure locations aligned accurately with the reported GIS coordinates.

Field assessments of this initiative were reviewed for workmanship and accuracy of the records provided. SDG&E exceeded the 2025 target of 200 poles. Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 33: Strategic Pole Replacement Program

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
200 Poles	228 Poles	228 Poles	224 Poles	114%

WMP.1190 – 8.1.3.6 Transmission Wood Pole Intrusive Inspections – Non-Focus and Non-Field Verifiable

An intrusive inspection typically involves an excavation around the pole base and/or a sound and bore of the pole at ground-line. Depending on the cavities or rot observed, an estimate of remaining pole strength is determined using industry-wide standards. The pole either passes, is reinforced with a steel truss, or is replaced. Intrusive inspections of transmission wood poles are completed on an 8-year cycle. Beginning in 2025, inspections performed in the WUI will be incorporated into the WMP reporting.

The 2023-2025 WMP set a target of 141 inspections in 2025. SDG&E did not provide a risk reduction goal for this initiative. In the 2025 AIR, SDG&E claimed 163 inspections. Based on data provided in the frontload request, SDG&E completed 163 inspections.

Sample verification was requested in DR008 and consisted of a spreadsheet with inspection results for three (3) non-HFTD and 26 HFTD Tier 2 intrusive inspections. This spreadsheet contains 29 individual records including Asset ID, Inspection location, Date, Status, and HFTD Class. All inspections are marked complete and no deficiencies were noted.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 34: Transmission Wood Pole Intrusive Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload and DR008 Response	Initiative Validation Rate
141 Inspections	163 Inspections	163 Inspections	163 Inspections	116%

WMP.1191 – 8.1.6.1 QA/QC of Transmission Inspections – Non-Focus and Non-Field Verifiable

QA/QC of transmission inspections is also referred to as secondary assessments for conditions identified during inspection. A construction supervisor performs a field assessment for 100% of conditions identified during an inspection. Secondary assessments are prioritized based on severity level of conditions and HFTD region.

The 2023-2025 WMP set a target of QA/QC 100% of transmission inspections. Across WMP.479, WMP.482, WMP.489, WMP.555, and WMP.1190, a total of 197 findings were recorded. SDG&E did not provide a risk reduction goal for this initiative. The 2025 EC AIR claimed 212 inspections

were completed in 2025. Data provided as part of the frontload request in spreadsheet format substantiates completion of 212 transmission inspections.

The IE requested QA/QC reports for items included in the frontload data with three (3) from non-HFTD, six (6) from HFTD Tier 2, and 21 from HFTD Tier 3 in DR009. In response, SDG&E clarified that individual inspection reports are not generated for QA/QC Transmission Inspection. If the supervisor detects an issue while fielding the patroller's work, feedback is provided during biweekly departmental meetings. This feedback is not formally documented. However, SDG&E provided another spreadsheet documenting Audit Date, HFTD Class, Asset ID, and other features of interest for the items requested in DR009.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 35: QA/QC Transmission Inspection

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload and DR009 Response	Initiative Validation Rate
100%	212 Inspections	100%	212 Inspections	100%

WMP.1192 – 8.1.6.3 QA/QC of Distribution Drone Assessments – Non-Focus and Non-Field Verifiable

Construction Supervisors review 100% of assessments and images processed through the machine learning models in production. If any discrepancies are identified, the Construction Supervisor will provide feedback to the Inspector during regular team meetings, and the inspection findings will be updated prior to finalization. Similarly, if there are any variations between the results of the machine learning model findings and the Inspector's findings, that information will be reviewed and validated by the Construction Supervisor.

The 2023-2025 WMP set a target of 13,500 QA/QC inspections of Distribution Drone Assessments. SDG&E did not provide a risk reduction goal for this initiative. The 2025 AIR claimed 13,500 internal audits were completed. Data provided in the frontload request as a spreadsheet contains 13,500 records.

The IE requested QA/QC reports for the items listed in the frontload data spreadsheet in DR010. Of these reports, three (3) from non-HFTD, six (6) from HFTD Tier 2, and 24 from HFTD Tier 3 were requested. The spreadsheet provided in response contains Facility ID, Date Reviewed by Supervisor, Audit Results, and Inspection Approved Date. HFTD of items in this spreadsheet was not included. Of the 30 records in this spreadsheet, three (3) had additional information in the audit results and the remainder had no further findings. This data substantiates that SDG&E performs QA/QC of inspections.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 36: QA/QC Distribution Drone Assessments

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload and DR010 Response	Initiative Validation Rate
13,500 Internal Audits	13,500 Internal Audits	13,500 Internal Audits	13,500 Internal Audits	100%

WMP.1193 – 8.1.6.4 QA/QC of Transmission & Distribution Wood Pole Intrusive Inspections – Non-Focus and Non-Field Verifiable

This program targets 10% of completed inspections to audit monthly and uses a randomizer to select the structures. Sample size is based on feasibility of performing the audits on a monthly basis. A third party is contracted to perform field audits. Audit findings are recorded in the wood pole inspection management system and shared with program administrators. Results are reviewed and shared at routing monthly meetings with the intrusive inspectors and leadership. Work is reissued to intrusive inspectors when discrepancies are identified, and corrections are performed within 2 weeks of the finding.

The 2023-2025 WMP set a target of 10% of QA/QC wood pole inspections monthly completed under WMP.483 and WMP.1190. SDG&E did not provide a risk reduction goal for this initiative. The amount claimed in the 2025 EC AIR was 31.5%. Data provided in the frontload request contained 1,381 records of pole inspections.

The IE requested QA/QC reports for the items listed in the frontload data spreadsheet in DR011. Of these reports, three (3) from non-HFTD, six (6) from HFTD Tier 2, and 24 from HFTD Tier 3 were requested. The spreadsheet provided in response contains Structure ID, Work Type, Status, Audit Date, Audit Result, and Audit Comments. HFTD of records in this spreadsheet was not included. Of the 33 records, 13 were not audited and one (1) failed. Reasons provided for not performing an audit included: “did not attempt: tribal,” backyard, “TE not approved,” or access constraints such as locked gates or not drivable roads. The “audit date” column includes a date for when the audit “was performed,” however, based on the additional “no audit” comments, it can be determined that these 13 audits were not completed, therefore the IE has invalidated these samples.

Based on this analysis and the invalidation of sampling data, this initiative’s sample validation rate is 62%, resulting in an initiative validation rate of 195% due to the over completion of the initiative target by 21.50%. However, it should be noted that SDG&E appears to be claiming audit completion toward this initiative for audits that were not conducted due to access restrictions.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 37: QA/QC Wood Pole Intrusive

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR011 Response	Initiative Validation Rate
10%	31.5%	1,381 Internal Audits	1,381 Internal Audits	195%

WMP.1194 – 8.1.6.5 QA/QC of Substation Inspections – Non-Focus and Non-Field Verifiable

Completed substation patrol inspections are periodically reviewed by a Construction Supervisor for quality control of regulatory requirements, relevancy, and internal considerations. The Construction Supervisor documents the completion of the review and any noted deficiencies in a maintenance order for the relevant substation. The documentation includes the route, date, substation name, inspector name, and a checklist of items reviewed. Should any discrepancies be found, the Construction Supervisor will conduct a near real-time training with all inspectors including an example of the deficiency followed by a display of the correct course of action.

The 2023-2025 WMP set a target of 18 QA/QC of substation inspections. SDG&E did not provide a risk reduction goal for this initiative. The 2025 EC AIR claimed 18 substation inspections were QA/QC'ed. Data provided in the frontload request contains 18 records and substantiates this claim.

The IE requested QA/QC reports for all 18 of the Substation Audits performed along with any associated photos or work/repair orders. SDG&E provided 18 PDF files of Substation Inspection Quality Reports. When the dates of the reports were compared with the Audit Date of the frontload spreadsheet there was complete agreement. Deficiencies or deviations from normal conditions, such as construction, were noted in the comments section of the appropriate item. Report forms for Miguel Substation appear to be duplicates; everything on the form, including audit dates, and completed information are identical. In the frontload data, the two Miguel Substation audits are reported for the same day, however, they contain unique OBJECTIDs and IaIDs, however, due to the duplicative nature of the submitted reports, it appears that SDG&E is counting one completed inspection audit as two with no additional context provided. Glenclyff substation was inspected twice, once in February and once in September. The reasoning for reinspection was not provided.

Based on this analysis, the documentation provided, and sampling verification, the IE has not validated this initiative. Due to the duplicative nature of the Miguel audit forms, it is determined that the Miguel audit is being captured for completion twice, when only one audit was performed. SDG&E should provide additional context to warrant one audit being recorded for two completions or provide unique audit reports for all claimed completed audits.

Table 38: QA/QC Substation Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR012 Response	Initiative Validation Rate
18 Internal Audits	18 Internal Audits	18 Internal Audits	17 Internal Audits	94%

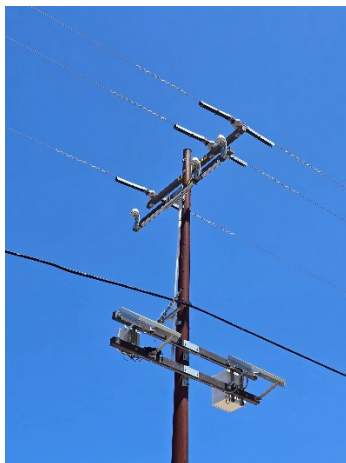
WMP.1195 – 8.1.2.8.2 – Early Fault Detection – Non-Focus & Field Verifiable

The Early Fault Detection initiative utilizes Advanced Radio Frequency Sensors (ARFS) and PQ Meters to proactively identify and mitigate equipment failures on the electric system, reducing the risk of wildfire ignition. As described in the 2023–2025 WMP, SDG&E's 2025 target for this initiative was to install 60 early fault detection nodes, with a risk reduction goal of 3.52 percent.

Per SDG&E's 2025 Q4 QDR, provided in response to the front-loaded data request, SDG&E reported installing 125 early fault detection nodes against the 60-node WMP target. The 2025 AIR, dated April 1, 2026, also reports 125 nodes and classifies the initiative as Exceeded. The front-loaded data request response included GIS data covering 86 structures.

The IE conducted field verification on a random sample of 34 early fault detection installation locations using GIS data submitted in response to the front-loaded data request, capturing geo-referenced photographs at each site. For each sample location, the IE confirmed structure identification, node installation consistent with design, and workmanship consistent with industry. For illustrative examples, please refer to Figure 14: Example Early Fault Detection Field Images.

Figure 14:
Example of Early Fault Detection Field Images



P774261



P33862



P219002

During field verification, the IE confirmed:

- Early fault detection nodes were properly installed.
- Structure locations aligned accurately with the reported coordinates.

Field assessments of this initiative were reviewed for workmanship and accuracy of the records provided. SDG&E exceeded the 2025 target of 60 nodes. Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 39: Early Fault Detection

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR012 Response	Initiative Validation Rate
60 Sensor Nodes	125 Sensor Nodes	125 Sensor Nodes	86 Sensor Nodes	208%

4.1.2.2 Funding Verification – Findings

Findings are presented in WMP ID order. Nineteen initiatives in this category have positive planned spend and exceed the 10 percent absolute difference threshold. WMP.550 is presented separately as a zero-plan, nonzero-actual exception because the standard APD formula is not computable when planned spend equals zero. Sub-threshold, FERC-funded, and embedded initiatives are recorded in the Initiative Summary Table.

WMP.455, 8.1.2.1, Distribution Overhead Hardening (Covered Conductor)

Initiative Overview: This initiative funds the installation of covered conductors on distribution overhead lines in the High Fire Threat District to reduce the probability of ignition from line contact with vegetation, animals, and debris. The controlling 2025 target is 50 circuit miles, as amended and approved under SDG&E's 2025 Petition to Amend on July 11, 2025.

Financial Performance Analysis

- **Planned Spend:** \$83,473K
- **Actual Expenditure:** \$92,501K
- **Variance:** +\$9,028K overspend, 10.8 percent absolute percent difference

Variance Justification: Per SDG&E's DR004 Q2 response, the variance is approximately 36 percent unit volume and 64 percent unit cost, consistent with implementation against the amended higher mileage target. The 2025 AIR attributes the overspend to additional miles constructed and a higher proportion of O&M costs relative to a 2024 baseline forecast.

Operational Impact and Risk Reduction: SDG&E reported completing 52.03 circuit miles against the 50-mile amended target, a status of Exceeded. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The overspend is implementation-driven against the increased target approved through the 2025 Petition to Amend, with both volume and unit cost contributing per DR004 Q2. Because avian protection costs performed in combination with covered conductor

work are recorded to the WMP.455 budget, this finding should be read together with WMP.972, whose standalone variance reflects that embedded cost basis.

WMP.459, 8.1.4.4, Expulsion Fuse Replacement

Initiative Overview: This initiative funds the replacement of standard expulsion fuses with CAL FIRE-approved fire-safe fuses in the HFTD, reducing ignition risk. The controlling 2025 target is 700 fuses, measured against the original plan because Energy Safety denied SDG&E's requested reduction to 80 fuses.

Financial Performance Analysis

- **Planned Spend:** \$1,550K
- **Actual Expenditure:** \$950K
- **Variance:** -\$600K underspend, 38.7 percent absolute percent difference

Variance Justification: Per the 2025 AIR, the program was paused in April 2025 pending the Petition to Amend, and it was restarted after the amendment was denied in July 2025. SDG&E attributes the expenditure shortfall to the program pause.

Operational Impact and Risk Reduction: SDG&E reported completing 503 of 700 fuses, a status of Delayed against the 2025 annual target. The 2023 to 2025 cycle target was substantially met at 93 percent per the 2025 AIR Table 5-1. The IE did not identify evidence that the variance reduced initiative implementation in the cycle aggregate.

Assessment and Conclusion: The underspend reflects a documented program pause between April and July 2025, measured against the unreduced 700-fuse plan that Energy Safety upheld in denying SDG&E's requested reduction. The denied-amendment baseline should remain visible in the Funding Executive Summary, so the variance is not misread as discretionary under-execution.

WMP.461, 8.1.2.11.1, PSPS Sectionalizing Enhancements

Initiative Overview: This initiative funds the installation of sectionalizing switches that narrow the footprint of Public Safety Power Shutoff events. The 2025 target is 10 switches.

Financial Performance Analysis

- **Planned Spend:** \$1,485K
- **Actual Expenditure:** \$981K
- **Variance:** -\$504K underspend, 34.0 percent absolute percent difference

Variance Justification: Per the 2025 AIR, SDG&E completed 9 of 10 sectionalizing devices. The final device was delayed by municipal and agency permitting and was approved in January 2026 and installed in February 2026. The underspend reflects the deferral of the single delayed device rather than a reduced scope.

Operational Impact and Risk Reduction: SDG&E reported the 2025 target as substantially met, with the cumulative cycle target met per the 2025 AIR. The IE did not identify evidence that the variance reduced the initiative implementation.

Assessment and Conclusion: The underspend reflects the deferral of a single sectionalizing device due to municipal and agency permitting, not a reduction in scope; the device was approved in January 2026 and installed in February 2026. The IE did not identify any reconciliation item for this initiative, other than confirming AIR Appendix A as the controlling source for the standalone actual amount.

WMP.462, 8.1.2.7, Microgrids

Initiative Overview: This initiative funds microgrid infrastructure to support community resilience and mitigate the impacts of Public Safety Power Shutoffs in backcountry areas not served by traditional hardening. The 2025 AIR does not identify a 2025 unit target for this initiative.

Financial Performance Analysis

- **Planned Spend:** \$1,236K
- **Actual Expenditure:** \$2,158K
- **Variance:** +\$922K overspend, 74.6 percent absolute percent difference

Variance Justification: Per the 2025 AIR, SDG&E attributes the overspend to a full battery replacement at the Cameron Corners microgrid. SDG&E reports that the originally installed battery storage assets failed to meet minimum performance guarantees, including power output, energy capacity, and round-trip efficiency, and required replacement. The replacement cost is asset-specific and was not contemplated in the 2025 plan.

Operational Impact and Risk Reduction: There is no 2025 unit target against which to assess progression. The 2025 AIR records the spend as associated with the replacement of existing microgrid battery assets rather than incremental capacity addition. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The overspend reflects a single asset-specific replacement event at the Cameron Corners microgrid that was not contemplated in the 2025 plan, rather than a change in program scope or unit cost. Because the planned base is small, the \$922K variance is the material measure for this finding, and summaries should pair the percentage with the dollar figure to avoid overstating routine program drift.

WMP.464, 8.1.4.5, Maintenance, Repair, and Replacement of Connectors, Including Hotline Clamps

Initiative Overview: This initiative funds the maintenance, repair, and replacement of connectors, including hotline clamps, on overhead distribution structures in the HFTD, to reduce the risk of ignition caused by connector failure. The controlling 2025 target is 950 hotline clamps, measured against the original plan because Energy Safety denied SDG&E's requested reduction to 100 hotline clamps.

Financial Performance Analysis

- **Planned Spend:** \$1,753K
- **Actual Expenditure:** \$453K
- **Variance:** -\$1,300K underspend, 74.1 percent absolute percent difference

Variance Justification: Per the 2025 AIR, the 2023 and 2024 programs over-delivered scope, so the 2025 scope was reduced. Fewer clamps were installed in 2025 while the 2023 to 2025 cycle target was completed. SDG&E attributes the expenditure shortfall to prior-year over-delivery.

Operational Impact and Risk Reduction: SDG&E reported completing 110 of 950 clamps for 2025, a status of Delayed against the annual target. The three-year cycle target was met per the 2025 AIR. The IE did not identify evidence that the variance reduced initiative implementation in the cycle aggregate.

Assessment and Conclusion: The underspend reflects front-loaded delivery in 2023 and 2024, measured against the unreduced 950-clamp 2025 baseline that Energy Safety upheld when it denied SDG&E's request for a reduction. The three-year cycle target was met in aggregate; the denied-amendment baseline should remain visible in the Funding Executive Summary, so the single-year variance is not misread as missed work.

WMP.466, 8.1.2.11.3, Generator Grant Program

Initiative Overview: This initiative funds grant-supported portable backup power for eligible Tier 2 and Tier 3 customers supporting PSPS resilience. The 2025 objective is program continuation rather than a unit-count target.

Financial Performance Analysis

- **Planned Spend:** \$3,953K
- **Actual Expenditure:** \$2,180K
- **Variance:** -\$1,773K underspend, 44.9 percent absolute percent difference

Variance Justification: Per the 2025 AIR, 2025 was a transitional year in which residential customer offerings and funding were partially redirected to support Fixed Backup Power installations under WMP.468 and preparatory efforts for the Customized Resiliency Assessment Program. SDG&E attributes the lower count of portable propane generators and backup battery units deployed under the Generator Grant Program to this planned realignment.

Operational Impact and Risk Reduction: SDG&E reported that qualitative milestones for this program were achieved. The Generator Grant Program retired in 2025 as part of the transition. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The underspend reflects a documented programmatic realignment in a planned transition year, with funds redirected to WMP.468 Fixed Backup Power and prepared for the 2026 Customized Resiliency Assessment Program. WMP.466 and WMP.468 should be read together, as the realignment redistributes spend between the two lines without changing the underlying customer support intent.

WMP.467, 8.1.2.11.4, Generator Assistance Program

Initiative Overview: This initiative funds rebates for portable backup power solutions for Tier 2 and Tier 3 HFTD customers. The 2025 objective is program continuation rather than a unit-count target.

Financial Performance Analysis

- **Planned Spend:** \$494K
- **Actual Expenditure:** \$671K
- **Variance:** +\$177K overspend, 35.8 percent absolute percent difference

Variance Justification: Per the 2025 AIR, SDG&E attributes the increase in spend to increased customer participation, driven by PSPS de-energizations in late 2024 and early 2025. The PSPS activity increased demand for portable backup power among eligible HFTD customers, increasing rebate uptake and associated program support costs.

Operational Impact and Risk Reduction: SDG&E reported that qualitative milestones for this program were achieved. The IE did not identify evidence that the variance reduced initiative implementation; the overspend remained within the program's approved purpose of mitigating customer impacts associated with PSPS de-energizations.

Assessment and Conclusion: The overspend is event-driven, with rebate uptake increasing in response to the January 2025 PSPS de-energizations rather than from a change in program design. The \$177K variance is the material measure for this finding, given the small planned base, and the spend remained within the program's approved purpose of mitigating PSPS customer impacts.

WMP.468, 8.1.2.11.2, Standby Power Program (Fixed Backup Power)

Initiative Overview: This initiative funds the umbrella backup power program, including Fixed Backup Power for residential and commercial customers and the Mobile Home Park Resilience Program, for backcountry customers not served by traditional hardening. The 2025 target is 89 units.

Financial Performance Analysis

- **Planned Spend:** \$1,000K
- **Actual Expenditure:** \$1,927K
- **Variance:** +\$927K overspend, 92.7 percent absolute percent difference

Variance Justification: Per the 2025 AIR, SDG&E attributes the overspend to reallocation of funding and accelerated deployment of higher-cost permanent resiliency solutions during a planned transition year. In 2025, the residential component of Fixed Backup Power transitioned to the Customized Resiliency Assessment Program, increasing installations of permanent backup battery systems, which carry higher per-unit costs than originally forecast.

Operational Impact and Risk Reduction: SDG&E reported completing 88 of 89 units, a status of Completed at substantially met. The remaining project was awaiting third-party final inspection

and interconnection agreements. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The overspend reflects a documented reallocation toward higher-cost permanent resiliency solutions in a planned transition year, with funds redirected from WMP.466 to support installations under the umbrella backup power program. AIR Appendix A is the controlling source for the standalone actual amount of \$1,927K.

WMP.475, 8.1.2.5.1, Distribution Overhead System Hardening (Traditional)

Initiative Overview: This initiative funds traditional overhead hardening, including pole class upgrades, hardware replacement, and structural reinforcement in high fire-threat areas, which are reported within the grouped traditional overhead hardening cost bucket.

Financial Performance Analysis

- **Planned Spend:** \$5,950K
- **Actual Expenditure:** \$7,656K
- **Variance:** +\$1,706K overspend, 28.7 percent absolute percent difference

Variance Justification: Per SDG&E's DR004 Q2 response, the variance is approximately 91 percent unit volume and 9 percent unit cost. The 2025 AIR attributes the overspend to increased O&M costs that depend on true-up activities, remediation efforts, and final design packages that are difficult to estimate at planning.

Operational Impact and Risk Reduction: The 2025 AIR reports that the target was exceeded; the volume-driven overspend indicates that more hardening was delivered within the grouped bucket than forecast. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The overspend is implementation-driven, with the variance approximately 91 percent volume and 9 percent unit cost per DR004 Q2, indicating that more hardening was delivered within the grouped traditional overhead hardening bucket than forecast. The Initiative Summary Table should disclose the 0-mile 2025 target paired with planned spend and reported completion of 0.11 miles, so the reader understands why a non-zero spend is tied to a zero-target line.

WMP.479, 8.1.3.2, Transmission Overhead Detailed Inspections

Initiative Overview: This initiative funds detailed inspection of transmission overhead structures under GO 165 and the CAISO-approved transmission maintenance cycle to identify ignition-risk conditions before failure. The 2025 target is 2,479 structures.

Financial Performance Analysis

- **Planned Spend:** \$1,958K
- **Actual Expenditure:** \$1,545K
- **Variance:** -\$413K underspend, 21.1 percent absolute percent difference

Variance Justification: Per the 2025 AIR, SDG&E attributes the variance to forecast variability on active structures on energized tielines and to the CAISO-approved six-month completion timeframe, which shifts anticipated completion timing across the boundary of the reporting year. SDG&E reported completing 2,184 of 2,479 structures, a status of Delayed.

Operational Impact and Risk Reduction: The 2025 AIR Table 5-1 records an expected risk reduction of 0.98 percent and an actual risk reduction of 0.81 percent, with the difference attributed to fewer critical findings rather than missed inspections. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The underspend is associated with documented timing drivers and the CAISO six-month completion window, not with reduced inspection scope. The IE identifies a reporting classification reconciliation item: AIR Section 5.2.22 states that expenditures are FERC funded and not reported within the WMP, while AIR Appendix A records planned spend of \$1,958K and actual spend of \$1,545K. Under the source-precedence rule, AIR Appendix A figures are used here unless SDG&E issues a correction or clarification before final publication.

WMP.481, 8.1.3.3, Distribution Infrared Inspections

Initiative Overview: This initiative funds infrared inspection of distribution assets to detect thermal anomalies before failure. The 2025 target is 300 inspections.

Financial Performance Analysis

- **Planned Spend:** \$5K
- **Actual Expenditure:** \$14K
- **Variance:** +\$9K overspend, 171.6 percent absolute percent difference

Variance Justification: Per the 2025 AIR, SDG&E attributes the overspend to increased labor costs. The planned base is very small, so a modest dollar movement is magnified.

Operational Impact and Risk Reduction: SDG&E reported completing 302 of 300 inspections, indicating Exceeded status. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The percentage is high because the planned base is very small; the \$9K dollar variance is the material measure, and the target was exceeded. Summaries should pair the percentage with the dollar figure to avoid overstating the materiality of this item in the category aggregate.

WMP.483, 8.1.3.5, Distribution Wood Pole Intrusive Inspections

Initiative Overview: This initiative funds intrusive below-grade inspection of distribution wood poles under GO 165 to detect internal decay. The 2025 target is 344 inspections.

Financial Performance Analysis

- **Planned Spend:** \$1,541K
- **Actual Expenditure:** \$1,346K
- **Variance:** -\$195K underspend, 12.7 percent absolute percent difference

Variance Justification: Per the 2025 AIR, SDG&E attributes the variance to the cost recording basis. Additional inspections beyond the 344 target were performed under GO 95, Rule 44, and charged to the requesting project rather than being recorded as O&M, so the WMP O&M expenditure was less than planned despite a higher inspection volume.

Operational Impact and Risk Reduction: SDG&E reported completing 1,478 of 344 inspections, indicating Exceeded status. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The underspend is a documented cost recording outcome rather than under-delivery; additional inspections beyond the 344 target were performed under GO 95 Rule 44 and charged to the requesting project rather than to the WMP O&M line. The IE recommends a brief footnote in the Initiative Summary Table identifying the GO 95 Rule 44 charging basis so the apparent underspend paired with an exceeded inspection count is not misread.

WMP.519, 8.1.5.4.1, Centralized Repository for Data (WMP Data Platform)

Initiative Overview: This initiative funds the development of the WMP data platform, including cloud-native QDR data products and the supporting legacy SAP HANA transition that underpins wildfire mitigation analytics and reporting. The initiative is funding and objective-based and does not carry a 2025 unit target.

Financial Performance Analysis

- **Planned Spend:** \$10,524K
- **Actual Expenditure:** \$4,617K
- **Variance:** -\$5,907K underspend, 56.1 percent absolute percent difference

Variance Justification: Per SDG&E's DR004 Q8 response, approximately \$5.9M in capital scoped for 2025 was deferred and resequenced into 2026 across the cloud-native QDR data products workstream and the legacy SAP HANA transition. SDG&E reports that the work is phased rather than eliminated, with the deferred capital programmed to begin in 2026 under the WMP.519 Enterprise Data Foundation successor program.

Operational Impact and Risk Reduction: The platform work was resequenced rather than canceled, and the underspend reflects the timing of multi-year capital rather than abandoned scope. There is no 2025 unit target against which to assess progression. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The variance reflects a documented capital deferral and resequencing into the Enterprise Data Foundation 2026 successor program, not abandoned scope. Because this is multi-year capital, carryover should be tracked across the 2026 to 2028 cycle rather than read as a single-year reduction.

WMP.545, 8.1.2.5.2, Distribution Underbuild

Initiative Overview: This initiative funds hardening of distribution facilities underbuilt on transmission structures, reported within the grouped traditional overhead hardening cost bucket.

The controlling 2025 target is 2 miles as noted in the AIR Appendix A; the initiative is delayed under either basis because SDG&E reported 0 miles completed in 2025.

Financial Performance Analysis

- **Planned Spend:** \$3,501K
- **Actual Expenditure:** \$2,735K
- **Variance:** -\$766K underspend, 21.9 percent absolute percent difference

Variance Justification: Per SDG&E's DR004 Revised Q3 response, the program was underspent in 2025. Approximately \$97K was erroneously charged to O&M rather than capital in 2024 and was corrected in 2025. The original 2025 AIR statement that the erroneous charges would be reversed and recorded in 2026 actuals was a misstatement and is not controlling. The 2025 AIR also indicates that work completed in 2023 and 2024, along with delays due to environmental and permitting reviews, reduced the available completed scope in 2025.

Operational Impact and Risk Reduction: SDG&E reported completing 0 of 2 miles for 2025, a status of Delayed. For context, the 2023 to 2025 cycle target was exceeded, with 24.33 miles completed against a cycle target of 9.9 miles. The IE did not identify evidence that the variance reduced initiative implementation in the cycle aggregate.

Assessment and Conclusion: The variance reflects scheduling, prior-year over-delivery, and a \$97K O&M-to-capital correction, not insufficient funding; the three-year cycle target was exceeded at 24.33 miles against a 9.9-mile cycle plan. The IE relies on DR004 Revised Q3 rather than the original AIR narrative for the controlling classification of this variance.

Zero-Plan Nonzero-Actual Exception

WMP.550, 8.1.4.6, Lightning Arrester Removal and Replacement

Initiative Overview: This initiative funds the replacement and installation of lightning arresters in the HFTD to reduce the risk of ignition from arrester failure. The controlling 2025 target is 90 arresters, as amended and approved under SDG&E's 2025 Petition to Amend on July 11, 2025.

Financial Performance Analysis

- **Planned Spend:** \$0K
- **Actual Expenditure:** \$508K
- **Variance:** +\$508K positive actual spend against a zero planned baseline; the standard absolute percent difference formula is not computable

Variance Justification: Per the 2025 AIR, SDG&E attributes the spend to the timing of the Petition to Amend approval. The Petition to Amend reduced the planned target and planned expenditures to align with the GRC decision; however, projects already in flight continued between petition submission and approval, resulting in completion above the amended target and associated actual spend.

Operational Impact and Risk Reduction: SDG&E reported completing 1,015 arresters against the amended 90-arrester target, resulting in an Exceeded status. The variance reflects amended-

baseline timing rather than reduced implementation. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: This initiative is presented as a zero-plan positive-actual exception because the standard APD formula is not computable on a zero denominator, not because the variance is immaterial. The IE discloses the \$508K actual spend, so the item is not omitted from the funding review, and notes that the spend reflects projects already in flight between the Petition to Amend submission and the July 2025 approval, rather than work outside the amended plan.

WMP.552, 8.1.3.7, Drone Assessments

Initiative Overview: This initiative funds drone-based assessment of distribution assets to identify ignition-risk conditions. The controlling 2025 target is 13,500 inspections, measured against the original plan, because Energy Safety denied SDG&E's requested reduction to 6,500 inspections.

Financial Performance Analysis

- **Planned Spend:** \$86,427K
- **Actual Expenditure:** \$67,053K
- **Variance:** -\$19,374K underspend, 22.4 percent absolute percent difference

Variance Justification: Per SDG&E's DR004 Q4 response, SDG&E attributes the variance to three drivers: program maturation, a shift to desktop review by qualified internal inspectors, and completion of the 2021 to 2022 Drone Inspection Annual Report backlog repairs, which accounted for approximately \$17M of the \$18.8M in O&M repair costs. DR004 records O&M planned and actual spend of \$31,490K and \$20,262K, and capital planned and actual spend of \$54,937K and \$46,792K.

Operational Impact and Risk Reduction: SDG&E reported completing 13,500 of 13,500 inspections, a status of Completed at the full target. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The category's single largest dollar underspend is explained by three documented drivers in DR004 Q4 (program maturation, a shift to internal desktop review, and completion of the 2021 to 2022 DIAR backlog repairs, accounting for approximately \$17M of \$18.8M in O&M repairs), not by reduced inspection activity; the 100 percent target was met. The IE relies on DR004 Q4 rather than the earlier January 2025 Change Order Report R0 as the controlling source for the variance driver.

WMP.972, 8.1.2.10.1, Avian Protection

Initiative Overview: This initiative funds avian-protection installations on overhead distribution structures in the HFTD that also reduce the risk of contact-related ignition. The controlling 2025 target is 200 poles, measured against the original plan because Energy Safety denied SDG&E's requested reduction to 95 poles.

Financial Performance Analysis

- **Planned Spend:** \$1,523K
- **Actual Expenditure:** \$347K
- **Variance:** -\$1,176K underspend, 77.2 percent absolute percent difference

Variance Justification: Per SDG&E's DR004b response and the 2025 AIR, avian protection installations completed in combination with covered conductor installations were recorded in the WMP.455 Covered Conductor budget rather than the avian protection budget. SDG&E attributes the standalone underspend to this embedded cost reporting basis.

Operational Impact and Risk Reduction: SDG&E reported delivery exceeding the 200-pole target. AIR Appendix A and Q4 QDR report 725 poles inclusive of avian work performed within the WMP.455 Covered Conductor program, while DR004b Q2 reports 137 standalone poles independent of covered conductor. The IE did not identify evidence that the variance-reduced implementation of the initiative; the percentage underspend is an embedded cost artifact.

Assessment and Conclusion: The standalone underspend is not a meaningful measure of delivery because avian protection costs are recorded against WMP.455 when the work is performed in combination with covered conductor installation.

WMP.1017, 8.1.2.5, CNF Distribution Overhead

Initiative Overview: This initiative funds distribution overhead work in the Cleveland National Forest, reported within the grouped traditional overhead hardening cost bucket. No discrete unit target is stated in the 2025 AIR.

Financial Performance Analysis

- **Planned Spend:** \$879K
- **Actual Expenditure:** \$486K
- **Variance:** -\$393K underspend, 44.7 percent absolute percent difference

Variance Justification: Per the 2025 AIR, SDG&E attributes the variance primarily to permitting constraints. The work requires a Forest Service cultural resource permit that has lapsed; efforts to reinstate it are ongoing. The underspend reflects deferral of work pending permit reinstatement rather than reduced scope.

Operational Impact and Risk Reduction: No discrete unit target is reported in the AIR. The initiative sits within the grouped traditional overhead hardening bucket, so standalone progression cannot be assessed in isolation. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The underspend reflects a documented deferral of permitting, not a reduction in scope; the work is expected to resume once the Forest Service cultural resource permit is reinstated. Because the initiative is reported within the grouped traditional overhead hardening bucket and the AIR records no discrete 2025 unit target, standalone progression cannot be assessed in isolation.

WMP.1189, 8.1.2.10.2, Strategic Pole Replacement Program

Initiative Overview: This initiative funds the replacement of high-risk gas-treated poles in the HFTD to improve resiliency. The controlling 2025 target is 200 poles, as amended and approved under SDG&E's 2025 Petition to Amend on July 11, 2025.

Financial Performance Analysis

- **Planned Spend:** \$8,226K
- **Actual Expenditure:** \$9,071K
- **Variance:** +\$845K overspend, 10.3 percent absolute percent difference

Variance Justification: Per the 2025 AIR, SDG&E attributes the variance to over-delivery, with 228 poles replaced against the amended 200-pole target. The overspend reflects unit overdelivery relative to the approved amended plan rather than a change in cost basis.

Operational Impact and Risk Reduction: SDG&E reported completing 228 of 200 poles, indicating an Exceeded status. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The overspend accompanies documented unit over-delivery against the amended 200-pole baseline, with 228 poles replaced, and is not a cost-basis change. Because the 10.3 percent APD is just above the 10 percent threshold, summaries should pair the percentage with the \$845K dollar figure to convey magnitude accurately.

WMP.1195, 8.1.2.8.2, Early Fault Detection

Initiative Overview: This initiative funds the deployment of Advanced Radio Frequency Sensors and power quality meters to identify incipient faults before ignition. The 2025 target is 60 nodes.

Financial Performance Analysis

- **Planned Spend:** \$4,419K
- **Actual Expenditure:** \$5,888K
- **Variance:** +\$1,469K overspend, 33.2 percent absolute percent difference

Variance Justification: Per the 2025 AIR, SDG&E attributes the variance to over-delivery. Additional optimal installation locations were identified after the 2023 to 2025 Base WMP submission, and 125 nodes were completed against the 60-node target. The overspend reflects unit overdelivery rather than a change in the cost basis.

Operational Impact and Risk Reduction: SDG&E reported completing 125 of 60 nodes, a status of Exceeded. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The overspend accompanies documented unit over-delivery, with 125 nodes completed against the 60-node target after additional optimal installation locations were identified following the Base WMP submission. AIR Appendix A is the controlling source for the standalone actual amount of \$5,888K; Q4 QDR reported a higher grouped total that does not represent the single-year WMP actual for this finding.

WMP.449, Wireless Fault Indicators. This initiative had \$0 planned spend and a -\$2K actual adjustment in AIR Appendix A. Per the 2025 AIR, the negative actual reflects a prior-year cost allocation correction. Because planned spend is zero, the standard absolute percent difference formula is not computable.

WMP.453, SCADA Capacitor Maintenance and Replacement Program. This initiative had \$0 planned spend and a -\$34K actual adjustment in AIR Appendix A. Per the 2025 AIR, the negative actual reflects a prior-year cost allocation correction. Because planned spend is zero, the standard absolute percent difference formula is not computable. Please refer to Table 6.

WMP.463, Advanced Protection. Since the absolute percent difference between planned and actual spend for this initiative is 3.7 percent, less than the 10 percent threshold, please refer to Table 6.

WMP.473, Strategic Undergrounding Program. Since the absolute percent difference between planned and actual spend for this initiative is 1.8 percent, less than the 10 percent threshold, please refer to the Initiative Summary Table. The controlling 2025 target was amended under the Petition to Amend from 125 to 28 circuit miles.

WMP.478, Distribution Overhead Detailed Inspections. Since the absolute percent difference between planned and actual spend for this initiative is 8.7 percent, less than the 10 percent threshold, please refer to Table 6.

WMP.482, Transmission Infrared Inspections. This initiative is FERC-funded and is not reported within WMP-tracked spend. Per DR004 Q11, transmission infrared inspection costs are approximately \$91K. Please refer to Table 6.

WMP.488, Distribution Overhead Patrol Inspections. Since the absolute percent difference between planned and actual spend for this initiative is 1.5 percent, less than the 10 percent threshold, please refer to Table 6.

WMP.489, Transmission Overhead Patrol Inspections. This initiative is FERC-funded and is not reported within WMP-tracked spend. Per DR004 Q11, transmission patrol inspection costs are approximately \$61K. Please refer to Table 6.

WMP.491, QA/QC of Distribution Detailed Inspections. This initiative is embedded in the Distribution Overhead Detailed Inspections program and is not reported separately in WMP-tracked spend; please refer to Table 6.

WMP.492, Substation Patrol Inspections. This initiative carried no planned or actual 2025 WMP-tracked spend; please refer to Table 6.

WMP.543, Transmission Overhead Hardening. Expenditures for this initiative are FERC-funded and are not reported within WMP-tracked spend. AIR Appendix A records \$0 planned and \$0 actual; DR004 Q11 identifies approximately \$16.2M of FERC-funded costs. The controlling 2025 target was amended from 4.64 to 2 circuit miles.

WMP.549, Distribution Communications Reliability Improvements. Since the absolute percent difference between planned and actual spend for this initiative is 9.1 percent, less than the

10 percent threshold, please refer to Table 6. The controlling 2025 target was amended from 42 to 5 base stations.

WMP.555, Transmission 69kV Tier 3 Visual Inspections. This initiative is FERC-funded and is not reported within WMP-tracked spend. Per DR004 Q11, costs are approximately \$16K. Please refer to Table 6.

WMP.1190, Transmission Wood Pole Intrusive Inspections. This initiative is FERC-funded and is not reported within WMP-tracked spend. Per DR004 Q11, costs are approximately \$4,300K. Please refer to Table 6.

WMP.1191, QA/QC of Transmission Inspections. This initiative is FERC-funded per AIR Section 5.2.32 and is not reported within WMP-tracked spend; please refer to Table 6.

WMP.1192, QA/QC of Distribution Drone Assessments. This initiative is embedded within Drone Assessments, WMP.552, and is not separately reported within WMP-tracked spend; please refer to Table 6.

WMP.1193, QA/QC of Wood Pole Intrusive Inspections (Distribution and Transmission). This initiative is embedded within the Distribution and Transmission Wood Pole Intrusive Inspection programs and is not reported separately in WMP-tracked spend; please refer to Table 6.

WMP.1194, QA/QC of Substation Inspections. Distribution-related costs are included in the base business and are not recorded in WMP-tracked spend; please refer to Table 6.

4.1.3 Synthesis of Findings

4.1.3.1 Initiative Review

SDG&E's 2025 wildfire mitigation performance across the Grid Design, Operations, and Maintenance category demonstrates a pattern of overperformance in infrastructure initiatives while experiencing targeted shortfalls in several inspection programs. Of the initiatives assessed, SDG&E exceeded targets in nine programs, including covered conductor installation (104%), strategic undergrounding (116%), avian protection (363%), and lightning arrester replacement (1,128%), while falling short in seven initiatives. The most significant target misses occurred in hotline clamp replacement (12% completion), expulsion fuse replacement (72%), advanced protection (78%), and PSPS sectionalizing (90%). These shortfalls reflect a combination of resource allocation challenges, permitting delays, and interdependencies between construction and commissioning activities. Across the category, SDG&E's risk reduction achievements varied. Several initiatives met or exceeded projected risk reduction goals and others, particularly transmission overhead detailed inspections, PSPS sectionalizing, and standby power programs, fell short of risk reduction targets despite completing substantial work volumes, primarily due to lower-than-anticipated identification of critical findings that drive risk reduction calculations.

Field verification confirmed alignment between reported completion data and physical installations for initiatives with GIS coordinates, as-built documentation, and structure identification consistently matching field observations. However, the IE identified data

management concerns in several areas. WMP.463 reported circuits as complete despite incomplete SCADA equipment installation at multiple poles, indicating a disconnect between construction tracking and commissioning verification systems; WMP.491 provided incomplete sampling documentation with only 25 of 34 requested records available; and WMP.1194 submitted duplicate audit forms for the Miguel Substation, suggesting potential double-counting in completion metrics.

4.1.3.2 Funding Verification

For the Grid Design, Operations, and Maintenance category, the funding review covered 38 initiatives. Nineteen positive planned-spend findings exceeded the 10 percent absolute percent difference threshold, and WMP.550 is disclosed separately as a zero-plan positive-actual exception. The category includes the principal grid-hardening, inspection, PSPS mitigation, backup power, communications, data platform, and equipment replacement funding lines in the confirmed 58-initiative scope.

Where 2025 annual targets were not met, the record attributes the shortfall to schedule timing, program pause, permitting, or prior-year over-delivery rather than to an identified funding constraint. Several findings require source transparency because financial reporting and implementation reporting use different aggregation or accounting bases. These include WMP.479, where AIR Appendix A reports positive planned and actual spend while narrative text identifies FERC-funded treatment; WMP.519, where capital was deferred and sequenced into the 2026 to 2028 cycle; and WMP.972, where avian protection costs are embedded in WMP.455 covered-conductor work.

The IE did not identify evidence that the variances reduced initiative implementation. The principal reporting considerations for this category are baseline transparency for denied Petition-to-Amend items, disclosure of embedded avian costs, treatment of FERC-funded transmission work, and the separate zero-plan exception for WMP.550.

4.2 VEGETATION MANAGEMENT AND INSPECTIONS

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.2.1 Initiative Summary Table

Table 40: Initiative Summary Table (Spend in Thousand \$)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ¹³	Sample Validation Rate (%) ^{14, 15}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{16, 17}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
WMP.494, 8.2.2.1, Detailed Inspections	485,400 Inspections	511,150 Inspections	Exceeded	138 Inspections	100%	SDG&E Vegetation Inspection Point List (Frontload Data) 138 Inspection Records (DR036)	105%	\$61,886.52	\$41,338.62 (-33.2%)	Yes 24.85%
WMP.497, 8.2.3, Fuels Management	500 Poles	500 Poles	Completed	32 Poles	100%	SDG&E Geodatabase Files (Frontload Data) 32 Pole Records (DR037)	100%	\$5,445	\$3,187.33 (-41.5%)	Yes 0.63%
WMP.501, 8.2.3.3, Clearance	11,200 Poles	11,921 Poles	Exceeded	137 Poles	100%	SDG&E Geodatabase Files (Frontload Data) 137 Pole Records (DR038)	107% ¹⁸	\$10,542.05	\$0 (-100%)	Yes 0.10%
WMP.505, 8.2.5.1 QA/QC Vegetation Management	15% Internal Inspection Audits ¹⁹	96,217 Internal Inspection Audits	Exceeded	35 Inspection Audits	100%	QA/QC Audit List (Frontload Data) 35 Audit Records (DR039)	100% ²⁰	\$0	\$0	No Goal Provided
WMP.508, 8.2.2.1.1, Off-Cycle Patrol	106 VMAs	106 VMAs	Completed	26 VMAs	100%	Vegetation Off-Cycle Patrol List (Frontload Data) 26 Inspection Records (DR040)	100%	\$0	\$0	N/A

¹³ N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.

¹⁴ The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.

¹⁵ N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.

¹⁶ The Initiative Validation Rate is determined by taking the Sample Validation Rate (%) times the EC-claimed amount and then divided by the WMP Initiative Target.

¹⁷ Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95%.

¹⁸ Data provided by SDG&E indicates that clearance pertaining to 11,983 trees occurred in 2025 resulting in an initiative validation rate of 107%. (11,983 * 1 / 11,200 = 1.069 * 100 = 106.9%) See Section 4.2.2.1, Initiative Review for WMP.501.

¹⁹ Refer to Section 4.2.2.1, Initiative Review for WMP.505 for more information on the initiative target.

²⁰ Although all sampling data was validated, documentation provided by SDG&E indicates that 79,205 internal audits occurred in 2025, resulting in a 99.70% initiative validation rate. (79205 * 1 / 79441 = .9970 * 100 = 99.70%) See Section 4.2.2.1, Initiative Review for WMP.505.



Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ¹³	Sample Validation Rate (%) ^{14, 15}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{16, 17}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
WMP.512, 8.2.3.1, Pole Clearing	33,010 Poles	33,250 Poles	Exceeded	35 Poles	100%	SDG&E Geodatabase File (Frontload Data) 35 Pole Records (DR041)	100% ²¹	\$8,129.98	\$4,613.35 (-43.3%)	Yes 2.84%

²¹ Although all sampling data was validated, documentation provided by SDG&E indicates that 33,002 poles underwent clearing in 2025, resulting in a 99.97% initiative validation rate. $(33,002 * 1 / 33,010 = .9997 * 100 = 99.97\%)$ See Section 4.2.2.1, Initiative Review for WMP.512.



4.2.2 Written Detail for Initiatives

4.2.2.1 Initiative Review – Findings & Method

WMP.494 – 8.2.2.1 Detailed Inspections – Focus and Non-Field Verifiable

Detailed vegetation inspections proactively identify and address vegetation risks near SDG&E assets. The 2023-2025 WMP set a target of 485,400 with a 24.85% risk reduction goal. In the 2025 EC AIR Table 5-1, SDG&E stated that the risk reduction was achieved with an actual rate of 25.08%. According to the 2025 Q4 QDR, SDG&E claimed 511,362 inspections were completed and according to the 2025 AIR, SDG&E claimed 511,150 inspections were completed, stating a 105% completion rate.

In support of WMP.494, SDG&E was asked to provide a list of all detailed inspections completed in 2025. The utility responded by submitting an Excel spreadsheet titled “SDGE_VegetationInspectionPoint_2025_Combined” which contained an itemized list of all inspections conducted under WMP.494, displaying 511,150 total inspections under the “units represented” column.

The IE reviewed a sample of 138 inspection reports which consisted of 14 from non-HFTD, 27 from Tier 2-HFTD and 97 from Tier 3-HFTD. In data request DR036, the utility was asked to provide PDF inspections reports for the 138 sample inspections. The utility provided an Excel spreadsheet entitled “IE-2026-DR036_Base” which contained inspection information for 138 inspections. The IE was able to cross reference the inspection data from the sampling attachment to the frontload data received.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 41: Detailed Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR036 Response	Initiative Validation Rate
485,400 Inspections	511,150 Inspections	511,362 Inspections	511,150 Inspections	105%

WMP.497 – 8.2.3 & Fuels Management – Non- Focus and Non- Field Verifiable

WMP.497 objective focuses on the thinning of ground vegetation surrounding structures located in the HFTD where the risk of ignition and propagation is present. Vegetation is thinned in a 50-foot radius from the outside circumference of the structures down to an approximate 30 percent vegetation cover where achievable. Non-native vegetation is prioritized for thinning. The WMP has a risk reduction goal of 0.63% for this initiative. In the 2025 EC AIR Table 5-1, SDG&E stated that the risk reduction was achieved.

The initiative target for 2025 was 500 poles. According to SDG&E’s 2025 annual EC AIR, the utility completed 500 poles. For the frontload data request, the utility provided 2025 Geospatial

Data recording 500 inspections. The spreadsheet recorded data such as a description of work, date of work completion, pole ID, environmental information, how debris was handled, and radial clearance distance.

The IE requested 32 items of sampling data to review and verify completeness of WMP.497. SDG&E provided a spreadsheet with requested pole ID and associated work completion date. Work details were reviewed on the frontload data spreadsheet for completeness.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 42: Fuels Management

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR037 Response	Initiative Validation Rate
500 Poles	500 Poles	500 Poles	500 Poles	100%

WMP.501 – 8.2.3.3 Clearance – Focus and Non-Field Verifiable

WMP .501 outlines SDG&E’s program related to trees and required clearance based upon regulatory minimums outlined in GO95. This program continues to focus on applying expanded post-trim clearances on targeted species identified as higher risk due to growth potential, failure characteristics, and relative outage frequency. The criteria for determining these clearances are based upon several factors as outlined in WMP Section 8.2.3.3 and the compliance goal is to trim an appropriate clearance to prevent a tree from encroaching on power lines. The WMP has a risk reduction goal of 0.10% for this initiative. In the 2025 EC AIR Table 5-1, SDG&E stated that the risk reduction was achieved.

The initiative target for 2025 was 11,200 trees. According to SDG&E’s 2025 annual EC AIR, the utility completed 11,921 trees which exceeded the projected target by 6.2%. For the Frontload Data request, the utility provided 2025 GIS data recording 11,983 trees recorded. This data includes work completion date, circuit, VMP ID, address, species and tree information, and debris removal.

The IE requested 137 items of sampling data to review and verify completeness for WMP.501. SDG&E provided a spreadsheet containing 140-line items with 137 unique VMP-IDs and TreeIDs. This data included the type of work activity, HFTD classification, completion date, condition code, and associated work order ID. The IE cross referenced the requested sampling data to the frontload data for further analysis on tree and species detail. The IE identified no discrepancies or issues.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 43: Clearance

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR038 Response	Initiative Validation Rate
11,200 Trees	11,921 Trees	11,983 Trees	11,983 Trees	107%

WMP.505 – 8.2.5 Quality Assurance/Quality Control Vegetation Management – Non-Focus and Non-Field Verifiable

Quality Assurance/Quality Control (QA/QC) for vegetation management activities, including pre-inspection, clearance (tree trimming), and pole clearing, verifies inspection and mitigation activities. This ensures consistent and accurate vegetation management practices.

SDG&E's 2023-2025 WMP set a target of completing QA/QC for 15% of total vegetation management inspections and mitigation efforts. No risk reduction goal was provided for this initiative. The target claimed in the 2025 EC AIR was 79,441 QA/QC of vegetation management. This target number is 15% of the sum of enhanced clearance (WMP.501), pole clearing (WMP.512), and detailed inspection (WMP.494) initiative targets as detailed in the 2025 EC AIR Appendix A. SDG&E claimed QA/QC was completed for 96,217 inspections in the same 2025 EC AIR.

Based upon documentation provided as a spreadsheet in the frontload request, SDG&E completed QA/QC for 79,205 inspections. The IE requested QA/QC reports and any associated work/repair orders generated in DR039 for three (3) inspections in non-HFTD, seven (7) inspections in HFTD Tier 2, and 25 inspections in HFTD Tier 3. Subsequent sampling data provided in response to this data request includes 35 inspection results. Information such as Initiative ID, Audit Date, HFTD Class, QA/QC work order id, and QA/QC results were included for each record. Three (3) of these inspections did not pass QA/QC due to contractor faults and no follow-up inspections, work orders, or documentation was provided to demonstrate the issue was resolved. The remaining 32 inspections passed QA/QC.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 44: QA/QC Vegetation Management

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR039 Response	Initiative Validation Rate
15% 79,441 Internal Audits	96,217 Internal Audits	96,217 Internal Audits	79,205 Internal Audits	99%

WMP.508 – 8.2.2.2 Off-Cycle Patrol Inspections – Non-Focus and Non-Field Verifiable

Vegetation Management performs a second annual tree inspection activity within the HFTD referred to as the “off-cycle” patrol (WMP.508). Of the 133 VMAs in the service territory, 106 are either partially or wholly within the HFTD. Approximately 240,000 of the 485,000 inventory trees are located within the HFTD. SDG&E did not provide a risk reduction goal for this initiative.

The initiative target for 2025 was 106 VMAs. According to SDG&E’s 2025 EC AIR, the utility performed inspections on 106 VMAs. For the frontload data request, the utility provided a 2025 Off Cycle Patrol spreadsheet indicating a total of 106 VMA inspections completed. The spreadsheet recorded data such as the VmiID, inspection method, inspection date, HFTD classification, and notes on issues identified.

The IE requested 26 items of sampling data to review and verify completeness of WMP.508. The utility provided a spreadsheet containing the sampling data. A discrepancy was noted with the sampling data, the IE requested 26 unique VmiIDs and in return received 19 unique VmiIDs, resulting in 7 missing sampling pieces. The IE opted to review the alternative sampling data provided and validated the remaining 7 samples. The data recorded information such as HFTD classification, VMA location, work completion date, condition code, and work order ID. The IE identified no issues or discrepancies with the data.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 45: Off-Cycle Patrol Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR040 Response	Initiative Validation Rate
106 VMAs	106 VMAs	106 VMAs	106 VMAs	100%

WMP.512 – 8.2.3.1 Pole Clearing – Non-Focus and Non-Field Verifiable

Pole clearing is a fire prevention measure involving the removal of vegetation at the base of poles that carry specific types of electrical hardware. The clearance requirements in PRC § 4292 require the removal of all vegetation down to bare mineral soil within a 10-foot radius from the outer circumference of subject poles. The requirement also includes the removal of live vegetation up to 8 vertical feet and the removal of dead vegetation up to conductor level.

The 2023-2025 WMP set a target of 33,010 poles cleared in 2025. SDG&E provided a risk reduction goal of 2.84%. In the 2025 EC AIR Table 5-1, SDG&E stated that the risk reduction was achieved. According to the 2025 AIR, SDG&E claimed 33,250 poles were cleared. Based upon documentation provided in GIS format as part of the frontload request, 33,002 poles were cleared.

The IE requested documentation for a total of 30 pole clearing completions in DR041. This documentation was to include three (3) non-HFTD, two (2) HFTD Tier 2, and 25 HFTD Tier 3.

The spreadsheet provided in response contains 35 records, all of which include information about Asset ID, Start and End Dates, HFTD Class, location, and pole clearing work order id. The sample data provided substantiates completion of pole clearing.

Two notices of non-performance (NON) were issued to SDG&E in relation to this initiative by the Office of Energy Infrastructure Safety (OEIS). The first, NON 1144, was issued March 10, 2026, documenting a eucalyptus stump within the 10-foot pole clearing radius required for poles with non-exempt equipment according to PRC 4292. SDG&E responded on April 3, 2026, including the work order request and before and after photos of the stump. OEIS determined that SDG&E has adequately addressed the concern, and no further action was required on April 10, 2026.

The second, NON 1149, was issued March 11, 2026, documenting two (2) eucalyptus stumps within the 10-foot pole clearing radius required for poles with non-exempt equipment according to PRC 4292. SDG&E responded on April 3, 2026, including the request form and before and after photos of the stumps. OEIS determined that SDG&E had adequately addressed the concern and no further action was required on April 10, 2026.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 46: Pole Clearing

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR041 Response	Initiative Validation Rate
33,010 poles	33,250 poles	33,250 poles	33,002 poles	100%

4.2.2.2 Funding Verification – Findings

Findings are presented in WMP ID order. Four initiatives in this category exceed the 10 percent absolute difference threshold. Embedded and zero-plan initiatives are recorded in the Initiative Summary Table.

WMP.494, 8.2.2.1, Detailed Inspections

Initiative Overview: This initiative funds detailed vegetation inspections of distribution and transmission rights-of-way to identify and prioritize ignition-risk vegetation. The controlling 2025 target is 485,400 inspections, measured against the original plan, because Energy Safety denied SDG&E's requested reduction to 255,000 inspections.

Financial Performance Analysis

- **Planned Spend:** \$61,887K
- **Actual Expenditure:** \$41,339K
- **Variance:** -\$20,548K underspend, 33.2 percent absolute percent difference

Variance Justification: Per SDG&E's DR004 Q5 response, vegetation costs are reported in an aggregated Tree Trimming bucket covering trimming, pre-inspection, and auditing, with WMP.501 clearance costs also absorbed into this bucket. SDG&E reports that the Detailed

Inspection component accounts for only 1.9 percent of the standalone underrun; the remainder is a pre-inspection scope adjustment tied to affordability measures. The Petition to Amend decision states that the GRC authorized a lower cost rather than a reduced scope.

Operational Impact and Risk Reduction: SDG&E reported completing 511,150 of 485,400 inspections, indicating Exceeded status. The underspend reflects cost aggregation and a lower authorized cost basis rather than reduced inspection activity. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The dollar underspend is an aggregation and authorization outcome rather than a reduction in inspection activity, with the WMP.494 Detailed Inspection component accounting for only 1.9 percent of the underrun per DR004 Q5, and the remainder reflecting a discretionary pre-inspection scope adjustment tied to affordability. WMP.494 should be read together with WMP.501 because WMP.501 clearance costs are absorbed into this aggregated bucket, and the aggregation basis should be disclosed in the Initiative Summary Table for transparency.

WMP.497, 8.2.3, Fuels Management Program

Initiative Overview: This initiative funds the management of ground fuels around poles and facilities in the HFTD to reduce ignition and spread potential. The 2025 target is 500 poles.

Financial Performance Analysis

- **Planned Spend:** \$5,445K
- **Actual Expenditure:** \$3,187K
- **Variance:** -\$2,258K underspend, 41.5 percent absolute percent difference

Variance Justification: Per SDG&E's DR004 Q7 response, the underrun is approximately 17 percent attributable to vendor transition savings, approximately \$536K, and 83 percent attributable to program maturation and reduced scope. The 2025 EC AIR attributes the underspend to the program's ability to target previously treated areas, a vendor transition that resulted in cost savings, and the number of community grants completed through fire safe councils and Tribal Nations.

Operational Impact and Risk Reduction: SDG&E reported completing 500 of 500 poles, a status of Completed at the full target. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The underspend reflects approximately 17 percent vendor transition savings (\$536K) and 83 percent program-maturation scope reduction per DR004 Q7, with the 500-pole target met. The IE did not identify a reconciliation item for this initiative; the variance is driven by documented unit costs and scope drivers rather than the reporting basis.

WMP.501, 8.2.3.3, Clearance (Enhanced)

Initiative Overview: This initiative funds vegetation clearance around energized facilities that exceeds regulatory minimums to reduce the risk of contact ignition. The 2025 target is 11,200 trees.

Financial Performance Analysis

- **Planned Spend:** \$10,542K
- **Actual Expenditure:** \$0K
- **Variance:** -\$10,542K underspend, 100.0 percent absolute percent difference

Variance Justification: Per SDG&E's DR004 Q6 response, the \$10,542K of clearance costs were absorbed within the WMP.494 Detailed Inspections aggregated cost bucket and not charged separately to this initiative. The 2025 EC AIR corroborates that costs were absorbed by other vegetation management programs. The 100 percent standalone underspend is an allocation outcome rather than unperformed work.

Operational Impact and Risk Reduction: SDG&E reported completing 11,921 of 11,200 trees, a status of Exceeded despite the \$0 standalone spend, because the underlying work was funded under WMP.494. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The 100 percent standalone variance is a documented cost absorption outcome, not unperformed work; the \$10,542K of clearance costs were charged to WMP.494 per DR004 Q6, and SDG&E reported completion of 11,921 of 11,200 trees. The Initiative Summary Table should explicitly disclose the absorption basis so the zero standalone spend is not misread as program abandonment.

WMP.512, 8.2.3.1, Pole Clearing

Initiative Overview: This initiative funds the clearing of vegetation around poles to meet the obligations under Public Resources Code Section 4292. The controlling 2025 target is 33,010 poles, measured against the original plan because Energy Safety denied SDG&E's requested reduction to 22,000 poles.

Financial Performance Analysis

- **Planned Spend:** \$8,130K
- **Actual Expenditure:** \$4,613K
- **Variance:** -\$3,517K underspend, 43.3 percent absolute percent difference

Variance Justification: Per SDG&E's DR004 Q7 response, 33,250 poles met Public Resources Code Section 4292 obligations in 2025, while approximately 16,672 previously forecast poles were exempt, reducing the work scope against the planned cost. The Petition to Amend decision states that the GRC authorized a lower cost rather than a reduced scope.

Operational Impact and Risk Reduction: SDG&E reported completing 33,250 of 33,010 poles, indicating Exceeded status. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: Public Resources Code Section 4292 obligations were met at a lower cost, with 33,250 poles cleared against the 33,010-pole target after approximately 16,672 previously forecast poles were determined exempt per DR004 Q7. The denied-amendment

baseline should remain visible in the Funding Executive Summary, so the underspend is read as a documented scope refinement rather than reduced PRC 4292 compliance.

WMP.505, QA/QC of Vegetation Management. This initiative is embedded within Detailed Inspections, WMP.494, at approximately \$6,187K per DR004 Q11; please refer to Table 40.

WMP.508, Off-Cycle Patrol. This initiative is embedded within Detailed Inspections, WMP.494, at approximately \$1,279K per DR004 Q11; please refer to Table 40.

WMP.1325, Right Tree, Right Place. This initiative had \$0 planned spend and \$17K actual spend in EC AIR Appendix A. The 2025 EC AIR attributes the actual spend to final invoicing and close-out activities during Q1 2025, including the system transition of the program database. Because planned spend is zero, the standard APD formula is not computable.

4.2.3 Synthesis of Findings

4.2.3.1 Initiative Review

SDG&E's 2025 vegetation management performance demonstrates consistent execution across all assessed initiatives, with the utility meeting or exceeding targets in every program within this category. The portfolio achieved completion rates ranging from 99.98% to 107%, with four of six initiatives surpassing their established targets: detailed inspections delivered 511,150 inspections against a 485,400 target (105%), enhanced clearance completed 11,983 trees against an 11,200 target (107%), QA/QC vegetation management audited 79,205 activities against a 79,441 target (99%), and pole clearing addressed 33,002 poles against a 33,010 target (99.98%). Fuels management and off-cycle patrol inspections both achieved exactly 100% of their respective targets of 500 poles and 106 Vegetation Management Areas (VMAs). Risk reduction achievements aligned closely with projections across the category: detailed inspections exceeded the 24.85% risk reduction goal with an actual rate of 25.08%, enhanced clearance and pole clearing both achieved their stated risk reduction targets of 0.10% and 2.84% respectively, and fuels management met its 0.63% goal.

The IE confirmed alignment between reported completion data and supporting records across all initiatives: detailed inspection data (WMP.494) provided tracking of 511,150 inspections with complete data including HFTD classification, asset identification, and finding details; enhanced clearance records (WMP.501) documented tree-level information including species, growth characteristics, and post-trim clearance distances for 11,983 trees; and pole clearing documentation (WMP.512) captured geospatial data, work order linkages, and debris removal methods for 33,002 poles. However, the IE identified two specific data management concerns: WMP.508 (Off-Cycle Patrol Inspections) sampling revealed a discrepancy where only 19 of 26 requested unique VmiIDs were provided, suggesting potential gaps in record retrieval systems or data organization protocols, though alternative sampling validated the missing records; and WMP.505 (QA/QC Vegetation Management) sampling identified three inspections that failed QA/QC due to contractor faults, with no follow-up documentation provided to demonstrate issue resolution, indicating incomplete audit trail closure for non-conformances. Additionally, two Notices of Non-Performance (NON 1144 and NON 1149) issued by the Office of Energy Infrastructure Safety documented eucalyptus

stumps remaining within the 10-foot pole clearing radius at multiple locations, though SDG&E promptly remediated these findings and provided photographic evidence of corrective action.

4.2.3.2 Funding Verification

For the Vegetation Management and Inspections category, the funding review covered seven initiatives, of which four exceeded the 10 percent absolute difference threshold. All four full findings are underspends. The category variance is primarily driven by cost aggregation, authorized cost-basis changes, and scope refinement, rather than by unperformed work.

The largest reporting item is the interaction between WMP.494 and WMP.501. WMP.501 reports zero standalone spend because its clearance costs were absorbed into the WMP.494 vegetation cost bucket. Without that disclosure, WMP.501 could be misread as unperformed work even though SDG&E reported exceeding the clearance target. WMP.494, WMP.497, and WMP.512 each report target completion or exceedance with documented cost drivers.

The IE did not identify evidence that the variances reduced initiative implementation. The principal reporting consideration is clear disclosure of vegetation cost aggregation and denied-amendment baseline treatment for WMP.494 and WMP.512.

4.3 SITUATIONAL AWARENESS AND FORECASTING

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.3.1 Initiative Summary Table

Table 47: Initiative Summary Table (Spend in Thousand \$)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ²²	Sample Validation Rate (%) ^{23, 24}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{25, 26}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
WMP.450, 8.3.6, Fire Potential Index ²⁷	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$4,538	\$3,013 (-34%)	N/A
WMP.970, 8.3.2.1.3, AQI – Sensor Installation	6 Sensors	N/A ²⁸	N/A	N/A	N/A	SDG&E 2025 WMP Update 04/02/24 Energy Safety Decision for WMP Update 10/30/24 (Frontload Data) SDG&E Extension Request 11/13/24 SDG&E Change Order Request 01/27/25 Energy Safety Extension/COR Response 02/24/25 SDG&E Petition to Amend 04/10/25 Energy Safety Petition to Amend Response 07/11/25	0%	\$0	\$0	N/A
WMP.1430, Weather Station Maintenance and Calibration	216 Inspections	216 Inspections	Completed	30 Inspections	100%	Weather Station Maintenance Log (Frontload Data) 30 Inspection Records (DR015)	100%	\$260.69	\$75.13 (-71.2%)	No Goal Provided
WMP.1431, Air Quality Station Maintenance	192 Inspections	194 Inspections	Exceeded	29 Inspections	100%	Air Quality Station Maintenance Log (Frontload Data) 29 Inspection Records (DR016)	101%	\$84	\$62.19 (-26.0%)	No Goal Provided

²² N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.

²³ The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.

²⁴ N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.

²⁵ The Initiative Validation Rate is determined by taking the Sample Validation Rate (%) times the EC-claimed amount and then divided by the WMP Initiative Target.

²⁶ Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95%.

²⁷ This initiative has no target, but a financial audit was performed. Refer to the financial review under section 4.3.2.2 for more detail.

²⁸ SDG&E submitted a WMP update to Energy Safety requesting change to this initiative’s target. Based on publicly available documentation, the IE determined that Energy Safety did not explicitly approve this update and therefore the target of 6 sensors for 2025 remained in effect. SDG&E claimed no progress toward this initiative on the 2025 EC AIR.



4.3.2 Written Detail for Initiatives

4.3.2.1 Initiative Review – Findings & Method

WMP.970 – 4.1.2 Air Quality Index – Non-Focus and Non-Field Verifiable

Installation of air quality index sensors supports wildfire risk mitigation by detecting particulate matter (PM2.5) to enhance situational awareness and response capabilities. The 2023-2025 WMP set a target to install six (6) sensors capable of detecting PM2.5 but did not set a risk reduction goal.

WMP.970 was not mentioned in the 2025 Q4 QDR and the 2025 EC AIR does not mention the installation of the targeted 6 sensors. On April 2, 2024, SDG&E submitted an update to their 2023-2025 WMP. This update included a statement requesting to adjust the 2025 target goal for this initiative to zero (formally requested the target to be “reduced by 100%”). On October 30, 2024, Energy Safety issued a letter to SDG&E to formally submit a change order within 10 days of the date of their letter. On November 13, 2024, SDG&E requested an extension to submit the change order until after the GRC decision was finalized. On January 27, 2025, SDG&E submitted their change order. In the table listed under the change order summary, initiative WMP.970 was not listed and its only mention was under “Attachment A Revised Initiative Targets.” On February 24, 2025, Energy Safety denied the extension request and denied the change order and instructed SDG&E to file a petition to amend by April 10, 2025. On April 10, 2025, SDG&E filed a petition to amend; however, under Section 3 requested changes, initiative WMP.970 was not listed and its only mention was in “Attachment A Revised Initiative Targets.” On July 11, 2025, Energy Safety approved 6 amendments and denied 11 amendments with no mention of approval or denial of any initiative listed under Attachment A, initiative WMP.970 was not listed under the approved or denied initiatives. Energy Safety stated “SDG&E must revise its last approved base WMP to reflect only the approved target amendments for 2025, as noted above,” WMP.970 was not one of the target amendments approved.

Based upon this analysis and the documentation provided, the IE has not validated this initiative.

Table 48: Air Quality Index

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
6 Sensors	N/A	N/A	0 Sensors	0%

WMP.1430 – 8.3.2.1.1 Weather Station Maintenance & Calibration – Non-Focus and Non-Field Verifiable

WMP.1430 objective is ongoing Weather Station Maintenance & Calibration. According to the WMP, the Weather Station Network and NDVI Cameras, initiative WMP.447, is being discontinued and evolving this initiative, WMP.1430. SDG&E did not provide a risk reduction goal for this initiative.

The initiative target for 2025 was to perform 216 inspections. According to SDG&E's 2025 EC AIR, the utility completed 216 inspections. For the Frontload data response, SDG&E provided a spreadsheet recording 216 inspections performed for 2025. This data included detail such as inspection completion date, location or address, HFTD classification, and asset feature such as substation or weather station.

The IE requested 30 items of sampling data to review and verify completeness for WMP.1430. SDG&E provided a combined PDF file with inspection & calibration records. The inspection/calibration records included information such as the station name, calibration date, the technicians' name, SCADA ID, and findings information.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 49: Weather Station Maintenance & Calibration Summary

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR015 Response	Initiative Validation Rate
216 Inspections	216 Inspections	216 Inspections	216 Inspections	100%

WMP.1431 – 8.3.2.1.3 Air Quality Station Maintenance – Non-Focus and Non- Field Verifiable

Per section 8.3.2.1.3 of the WMP, the WMP.1431 objective is to maintain and upgrade sensors as necessary. In 2025, the new program will target maintenance and calibration of the particulate sensors. Maintenance of the particulate sensors will include a scheduled monthly, quarterly, and annual inspection. SDG&E did not provide a risk reduction goal for this initiative.

The initiative target for 2025 was to perform 192 inspections. According to SDG&E's 2025 EC AIR, the utility completed 192 inspections. For the Frontload Data response, the utility provided a spreadsheet recording 194 inspections performed for 2025. The data included information such as OIID, location or address, and inspection completion date.

The IE requested 29 items of sampling data to review and verify completeness for WMP.1431. SDG&E provided a spreadsheet recording 16 items, the stations inspected included Cameron-CN, Avocado-AV, and Valley Center-VC. The utility also provided 15 Air Quality Station Maintenance Logs. Stations inspected included Miramar, S. Bay Branch, Mountain Empire, and Metro.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 50: Air Quality Station Maintenance

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR016 Response	Initiative Validation Rate
192 Inspections	194 Inspections	194 Inspections	194 Inspections	101%

4.3.2.2 Funding Verification – Findings

Findings are presented with the three forecasting initiatives first, in WMP ID order, followed by WMP.523, the risk-spend allocation methodology initiative aligned to this category in the confirmed 58-initiative scope. Four initiatives in this category exceed the 10 percent absolute difference threshold. WMP.970 is recorded by reference because it is included in the confirmed scope list but is not reported as a standalone 2025 EC AIR Appendix A funding line.

WMP.450, 8.3.6, Fire Potential Index

Initiative Overview: This initiative funds the maintenance and operation of the Fire Potential Index, a forecasting tool that informs situational awareness and operational decision-making during fire weather. The initiative is funding and objective-based and does not carry a 2025 unit target.

Financial Performance Analysis

- **Planned Spend:** \$4,538K
- **Actual Expenditure:** \$3,013K
- **Variance:** -\$1,525K underspend, 33.6 percent absolute percent difference

Variance Justification: Per SDG&E's DR004 Revised Q3 response, approximately \$1.425M was reclassified across accounting categories: \$827K was recorded as WMPMA O&M for the Fire Potential Index, and \$599K was recorded as FERC O&M outside WMPMA. The 2025 EC AIR attributes the underspend to an accounting adjustment based on updated information and a clearer understanding of how the costs were incurred and used, noting that the adjustment changed presentation but not the nature, timing, or amount of costs recovered.

Operational Impact and Risk Reduction: Forecasting activity continued throughout 2025 as documented in the EC AIR narrative. The variance is a classification of where costs were recorded rather than a reduction in situational awareness capability. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The variance reflects an accounting reclassification of approximately \$1,425K between WMPMA O&M, FPI, and FERC O&M per DR004 Revised Q3, not a reduction in forecasting capability; the underlying activity continued throughout 2025. The IE relies on DR004 Revised Q3 as the controlling source for this reclassification, superseding the earlier May 6 response figures.

WMP.1430, 8.3.2.4.1, Weather Station Maintenance and Calibration

Initiative Overview: This initiative funds maintenance and calibration of the weather station network that supports fire weather forecasting. The 2025 target is 216 stations.

Financial Performance Analysis

- **Planned Spend:** \$261K
- **Actual Expenditure:** \$75K
- **Variance:** -\$186K underspend, 71.3 percent absolute percent difference

Variance Justification: Per the 2025 EC AIR, expenditures were less than projected because installations are performed on an as-needed basis and only one weather station was installed in 2025. The budget is forecast before peak Santa Ana weather, when network gaps may require additional weather station installations; 2024 and 2025 observation data did not substantiate additional installations.

Operational Impact and Risk Reduction: SDG&E reported completing all 216 stations, with a status of Completed at the full maintenance target. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The percentage is high because the planned base is small and assumes additional weather station installations during peak Santa Ana weather; the \$186K variance is the material measure, and the 216-station maintenance target was fully met. The forecast methodology should be expected to produce similar percentage variances in years when network gaps do not require additional installations.

WMP.1431, 8.3.2.1.3, Air Quality Station Maintenance

Initiative Overview: This initiative funds scheduled maintenance and calibration of particulate air quality sensors that support situational awareness during smoke events. The 2025 target is 192 sensors.

Financial Performance Analysis

- **Planned Spend:** \$84K
- **Actual Expenditure:** \$62K
- **Variance:** -\$22K underspend, 26.2 percent absolute percent difference

Variance Justification: Per the 2025 EC AIR, expenditures were less than projected because maintenance costs were less than expected. The planned base is small, so a modest dollar movement is magnified as a percentage.

Operational Impact and Risk Reduction: SDG&E reported completing 194 of 192 sensors, a status of Exceeded. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The dollar variance is minor at \$22K, and the 192-sensor target was exceeded at 194 sensors. Summaries should pair the 26.2 percent with the dollar figure so the small denominator is not read as a material variance.

WMP.523, 8.1.5.4.4, Allocation Methodology Development and Application

Initiative Overview: This initiative funds the development and application of the risk-spend allocation methodology to prioritize wildfire mitigation investment. The initiative is funding and objective-based and does not carry a 2025 unit target.

Financial Performance Analysis

- **Planned Spend:** \$5,045K
- **Actual Expenditure:** \$2,567K
- **Variance:** -\$2,478K underspend, 49.1 percent absolute percent difference

Variance Justification: Per the 2025 EC AIR, the underspend reflects the reallocation of certain costs to the centralized data repository, WMP.519, and increased reliance on internal subject matter experts and technical staff in place of external consultants and vendors. SDG&E reports that the underlying analytics, methodology, and operational support work continued under this internal resourcing model.

Operational Impact and Risk Reduction: As an objective-based methodology initiative, there is no 2025 unit target against which to measure progression. The variance reflects a documented cost transfer and an internal resourcing decision rather than a reduction in methodology effort. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The variance reflects a documented reallocation of costs to WMP.519 and a shift from external consultants to internal subject matter experts, not reduced methodology effort. WMP.523 should be read together with WMP.519 because the findings are linked by the cost-transfer pattern, and the combined variance should be assessed at the program-of-record level rather than line-by-line.

WMP.970, Air Quality Management Program. This initiative is included in the confirmed 58-initiative scope list and is recorded in this section by reference; it is not reported in the 2025 EC AIR Appendix A and carries no 2025 WMP-tracked spend. Please refer to the Initiative Summary Table.

4.3.3 Synthesis of Findings

4.3.3.1 Initiative Review

Of the three initiatives assessed within this category, weather station maintenance and calibration (WMP.1430) and air quality station maintenance (WMP.1431) both met or exceeded their targets, completing 216 inspections (100%) and 194 inspections (101%) respectively. However, the air quality index sensor installation program (WMP.970) recorded zero completions against a six-sensor target, reflecting not an execution failure but rather an unresolved regulatory amendment process that left SDG&E operating under conflicting guidance throughout 2025. The two maintenance-focused initiatives did not include quantified risk reduction goals.

WMP.1430 provided inspection and calibration documentation including station identifiers, SCADA integration details, technician assignments, calibration dates, and findings, enabling full

traceability of maintenance activities across SDG&E's network. WMP.1431 similarly captured inspection completion dates, station locations, and HFTD classifications, with sampling verification confirming monthly, quarterly, and annual inspection cycles were executed as planned across facilities including Miramar, South Bay Branch, Mountain Empire, and Metro stations. However, the sampling response for WMP.1431 revealed a documentation inconsistency: the IE requested 29 sampling items but received only 16 spreadsheet records plus 15 maintenance logs, totaling 31 items across different documentation formats, suggesting potential variation in how maintenance activities are recorded depending on station type or inspection scope. For WMP.970, the absence of installation activity meant no field-level data quality assessment was possible, though the IE's review of the regulatory correspondence trail spanning SDG&E's April 2024 WMP update, October 2024 Energy Safety letter, November 2024 extension request, January 2025 change order, February 2025 denial, April 2025 petition to amend, and July 2025 partial approval, revealed significant administrative complexity.

4.3.3.2 Funding Verification

For the Situational Awareness and Forecasting category, the funding review covered four initiatives, all of which exceeded the 10 percent absolute difference threshold, together with WMP.970 by reference. All four findings are underspends. The largest dollar underspend is WMP.523, which SDG&E attributes to a reallocation of costs to the centralized data repository, WMP.519, and a shift from external consultants to internal subject matter experts; the underlying methodology and analytics work continued under that internal resourcing model. WMP.450 reflects an accounting reclassification between WMPMA O&M and FERC O&M identified through DR004 Revised Q3, while WMP.1430 and WMP.1431 are small-base maintenance underspends, with SDG&E reporting target completion or exceedance. WMP.970 carries no 2025 WMP-tracked spend and is recorded by reference.

The IE did not identify evidence that the variances reduced initiative implementation. The principal reporting considerations for this category are disclosure of the WMP.450 reclassification basis, so the underspend is not read as a reduction in forecasting activity, and the WMP.523–WMP.519 cost-transfer linkage, so the combined variance is assessed at the program-of-record level rather than line-by-line. WMP.519 is reported in the Grid Design, Operations, and Maintenance category in this 58-scope document, consistent with the confirmed scope list.

4.4 EMERGENCY PREPAREDNESS

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.4.1 Initiative Summary Table

Table 51: Initiative Summary Table (Spend in Thousand \$)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ²⁹	Sample Validation Rate (%) ^{30, 31}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{32, 33}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
WMP.526, 8.4.2.1.3, Emergency Response Wildfire/PSPS Exercise & Training	To ensure readiness, Wildfire/PSPS response teams will participate and recertify by 9/1 annually	Not Provided	Not Provided	N/A	N/A	Training Attendance Log Summer Readiness Training Materials (Frontload Data)	100%	\$0	\$0	No Goal Provided
WMP.1008, 5.4.2.1.1, CEADPP Updated	Submit CEADPP updates as part of the annual report required by Standard 11 by 12/30	There is no target to present	Not Provided	N/A	N/A	Kiteworks Submission ScrnSht (Frontload Data) CPUC GO166 Annual Reports Website	100%	\$22,130.42	\$34,477.71 (55.8%)	No Goal Provided

²⁹ N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.

³⁰ The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.

³¹ N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.

³² The Initiative Validation Rate is determined by taking the Sample Validation Rate (%) times the EC-claimed amount and then divided by the WMP Initiative Target.

³³ Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95%.



4.4.2 Written Detail for Initiatives

4.4.2.1 Initiative Review – Findings & Method

WMP .526 – 8.4.15 & Emergency Response Wildfire/PSPS Exercise & Training– Non- Focus and Non- Field Verifiable

WMP.526 objective is to develop training environments to better simulate all hazards and allow for more realistic exercises and training. SDG&E did not provide a risk reduction goal for this initiative.

The initiative target for 2025 was to ensure overall readiness and have the Wildfire/PSPS response teams participate and recertify by 9/1 annually. For the frontload data request, the utility provided the 2025 Summer Readiness Training presentation, and the associated training attendance sheet. There were four training sessions held throughout the month of July. Between all 4 training sessions and filtering out personnel marked as “no shows” there was a total of 386 training attendees in 2025. The training agenda and objectives addressed preparedness including training exercises, response protocols including EOC roles and responsibilities, and recovery which included levels of emergency and customer protection.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 52: Emergency Response Wildfire/PSPS Exercise & Training

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
To ensure readiness, Wildfire/PSPS response teams will participate and recertify by 9/1 annually	N/A	N/A	2025 Training and Attendance Record	100%

WMP.1008 – 8.4.2 Emergency Preparedness Plan – Focus and Non-Field Verifiable

This initiative focuses on comprehensive emergency preparedness planning and enhancing response capability, crucial for managing wildfire emergencies and minimizing their impacts. The 2025 WMP set a target to submit the CEADPP updates as part of the annual report required by GO166, Standard 11 by December 30, 2025.

WMP.1008 was not mentioned in the 2025 Q4 QDR, but according to the 2025 EC AIR, SDG&E claimed that in 2025, “emergency response plans were maintained and updated consistent with ICS principles. In total, 52 emergency management plans were reviewed and 17 plans were updated as scheduled.”

SDG&E provided a screenshot of their Kiteworks submission to CPUC, verified by the email domains in the address line, and included 13 attachments on June 29, 2025. SDG&E did not provide a copy of these attachments or the CERP to the IE; however, the IE was able to access the GO166 Report and associated CERP via the CPUC GO166 Annual Reports domain. The CERP included revisions made in March and December 2024 and were signed by the SDG&E Emergency Management Director and VP of Wildfire and Climate Science, verifying that the plan had been reviewed, accepted, and recommended to senior executive leadership for approval, dated April 25, 2025.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 53: Emergency Preparedness Plan

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Submit CEADPP updates as part of the annual report required by Standard 11 by 12/30.	52 Plans Reviewed/ 17 Plans Updated	N/A	CEADPP Updates Submitted on June 29, 2025	100%

4.4.2.2 Funding Verification – Findings

Findings are presented in WMP ID order. Three initiatives in this category exceed the 10 percent absolute difference threshold. Sub-threshold and master-list-only initiatives are recorded in the Initiative Summary Table.

WMP.557, 8.1.8.3.3, Aviation Firefighting Program

Initiative Overview: This initiative funds aviation firefighting and suppression resources, including aircraft and supporting contracts, that support rapid wildfire response. The initiative is funding and objective-based and does not carry a 2025 unit target.

Financial Performance Analysis

- **Planned Spend:** \$8,280K
- **Actual Expenditure:** \$5,283K
- **Variance:** -\$2,997K underspend, 36.2 percent absolute percent difference

Variance Justification: Per SDG&E's DR004 Q9 response, approximately \$848K had been recorded against Emergency Management and was reclassified to Aviation. The remaining approximately \$1.8M reflects the end of the Air Crane contract, less than a full year of Blackhawk helitanker costs, and other operational and contract savings. The 2025 EC AIR does not provide a rationale for this variance; the IE relies on DR004 Q9 as the controlling source.

Operational Impact and Risk Reduction: Aviation firefighting capability was maintained throughout 2025 as documented in the EC AIR. The underspend reflects a recording correction, plus contract and aircraft cost savings, as documented in DR004 Q9. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The variance is attributable to an \$848K recording correction reclassifying spend from Emergency Management to Aviation, the end of the Air Crane contract, and less than a full year of Blackhawk helitanker costs per DR004 Q9. The absence of a rationale in the 2025 EC AIR section text should be carried as a reporting observation; the underlying drivers are documented through DR004 rather than being absent.

WMP.563, 8.4.4, Public Emergency Communication Strategy

Initiative Overview: This initiative funds the development and delivery of the public emergency communication strategy that supports PSPS and wildfire event readiness. The initiative is funding and objective-based and does not carry a 2025 unit target.

Financial Performance Analysis

- **Planned Spend:** \$17,860K
- **Actual Expenditure:** \$15,498K
- **Variance:** -\$2,362K underspend, 13.2 percent absolute percent difference

Variance Justification: Per the 2025 EC AIR, the underspend reflects reprioritization of work and deferral of non-critical enhancements, combined with lower-than-anticipated emergency communications activity because no PSPS activations occurred toward the end of 2025. The annual budget assumes a level of PSPS-related activity that did not fully materialize.

Operational Impact and Risk Reduction: Readiness is not assessed against a unit target for this initiative. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The materiality of this finding is the dollar magnitude, approximately \$2.4M on a \$17.86M base, rather than the 13.2 percent; the variance reflects documented reprioritization and lower late-2025 PSPS-related activity. Summaries should pair the dollar figure with the percentage to convey scale accurately, and the finding should be read alongside WMP.527, which exhibits a similar PSPS-activity-dependent underspend pattern.

WMP.1008, 8.4.2.1.1, Emergency Preparedness Plan (CEADPP)

Initiative Overview: This initiative funds the maintenance of the Community and Emergency Affairs Disaster Preparedness Plan, including event-response capabilities and supporting tools. The 2025 requirement is an annual submission of the CEADPP update; there is no quantitative unit target.

Financial Performance Analysis

- **Planned Spend:** \$22,130K
- **Actual Expenditure:** \$36,516K
- **Variance:** +\$14,386K overspend, 65.0 percent absolute percent difference

Variance Justification: Per SDG&E's DR004 Q10 response, the overrun comprises approximately \$10.7M of direct event-response costs and approximately \$3.3M of post-event IT and tool enhancements. The 2025 EC AIR attributes the overspend to two unplanned PSPS activations in January 2025, each requiring Emergency Operations Center activation, extended staffing, overtime labor, contractor support, field patrols, damage inspections, re-energization activities, customer and community support, and incremental IT staffing.

Operational Impact and Risk Reduction: The CEADPP submission requirement was met for 2025. SDG&E attributes the overspend to event-response activity and follow-on system investment associated with the two January 2025 PSPS activations. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: The IE uses the EC AIR Appendix A actual spend of \$36,516K as the controlling figure under source precedence. The variance driver is documented in DR004 Q10 as approximately \$10.7M of direct event-response costs and approximately \$3.3M of post-event IT and tool enhancements associated with the two January 2025 PSPS activations, not expanded program delivery.

WMP.514, Crew Accompanying Ignition Prevention and Suppression. Since the absolute percent difference between planned and actual spend for this initiative is 3.5 percent, less than the 10 percent threshold.

WMP.526, Emergency Response Wildfire and PSPS Exercises. This initiative is not reported in the 2025 EC AIR Appendix A and carries no 2025 WMP-tracked spend; please refer to Table 51.

4.4.3 Synthesis of Findings

4.4.3.1 Initiative Review

SDG&E's 2025 performance in emergency planning and preparedness initiatives demonstrates full compliance with both training execution and regulatory reporting requirements, reflecting organizational commitment to maintaining response readiness for wildfire and PSPS events. Both assessed initiatives within this category, Emergency Response Wildfire/PSPS Exercise & Training (WMP.526) and Emergency Preparedness Plan (WMP.1008), achieved 100% completion of their respective targets. WMP.526 successfully conducted summer readiness training with 386 personnel completing recertification across four sessions held in July 2025, meeting the annual September 1st deadline established in the 2023-2025 WMP. WMP.1008 fulfilled its regulatory obligation by submitting the Catastrophic Event and Disaster Preparedness Plan (CEADPP) updates to the CPUC on June 29, 2025, well ahead of the December 30, 2025 deadline required under GO 166 Standard 11, while also maintaining 52 emergency management plans and updating 17 plans as scheduled throughout the year. Neither initiative included quantified risk reduction goals, appropriately reflecting their function as foundational preparedness capabilities that enable effective response when ignition events or PSPS activations occur rather than directly preventing ignitions. The successful execution of both training and planning requirements demonstrates

SDG&E's operational maturity in emergency management functions and investment in organizational readiness.

4.4.3.2 Funding Verification

For the Emergency Preparedness category, the funding review covered five initiatives, of which three exceeded the 10 percent absolute difference threshold. The category includes one event-driven overspend and two underspends. WMP.1008 accounts for the net overspend and is attributed by SDG&E to direct event-response costs and post-event IT and tool enhancements associated with two January 2025 PSPS activations. WMP.557 reflects a recording correction and aircraft contract savings identified through DR004. WMP.563 reflects reprioritization and lower late-year emergency communications activity.

The IE did not identify evidence that the variances reduced initiative implementation. The principal reporting considerations are the WMP.1008 actual-spend reconciliation to EC AIR Appendix A and DR004, and the WMP.557 documentation gap in the EC AIR narrative that was clarified through DR004.

4.5 COMMUNITY OUTREACH AND ENGAGEMENT

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.5.1 Initiative Summary Table

Table 54: Initiative Summary Table (Spend in Thousand \$)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ³⁴	Sample Validation Rate (%) ^{35 36}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{37 38}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
WMP.532, 8.5.2.1, Customer Feedback Outreach Surveys	Continue soliciting large scale customer/stakeholder feedback at least twice annually to incorporate into future plans	There is no target to present	Not Provided	N/A	N/A	2025 PSPS Pre- & Post-Season List Pre- & Post-Season Survey Overview (Frontload Data)	100%	\$0	\$0	N/A
WMP.1337, 8.5.2.4, PSPS Stakeholder Education & Awareness	Host at least one functional PSPS exercise annually including relevant stakeholders	Collaboration with California IOUs continued through regular strategy sessions aimed at refining wildfire and PSPS mitigation approaches and identifying new alignment opportunities. The EOC continued to host visits from utilities, trade associations, and government agencies.	Not Provided	N/A	N/A	PSPS Functional Exercise Attendance Log PSPS Tabletop Exercise Attendance Log Exercise Training Materials (Frontload Data)	100%	\$0	\$0	N/A

³⁴ N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.

³⁵ The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.

³⁶ N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.

³⁷ The Initiative Validation Rate is determined by taking the Sample Validation Rate (%) times the EC-claimed amount and then divided by the WMP Initiative Target.

³⁸ Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95%.



4.5.2 Written Detail for Initiatives

4.5.2.1 Initiative Review – Findings & Method

WMP.532 – 8.3.5.1.1 Customer Feedback Outreach Surveys – Non-Focus and Non-Field Verifiable

WMP.532 objective is continued community outreach and public awareness efforts. The initiative includes tasks such as refine and augment campaign and notifications for Annual Public education, expand reach based on customer/stakeholder feedback, expand public education to AFN, LEP populations and Tribal communities and solicit large-scale customer/ stakeholder feedback (campaign/notifications) for public education campaigns. SDG&E did not provide a risk reduction goal for this initiative.

The initiative target for 2025 was to solicit large-scale customer/ stakeholder feedback at least twice annually to incorporate into future plans. According to SDG&E’s 2025 EC AIR, the utility completed 2 feedback surveys in 2025. The utility provided a PDF which provided an overview of the 2025 pre- and post-season surveys. The preseason survey was conducted in September 2025, and the post season survey was conducted between January and February 2026; both surveys had a total of 902 responses each. SDG&E also provided a spreadsheet that included customer information, last survey completion date, and language information.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 55: Customer Feedback Outreach Surveys

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
2 Feedback Surveys	N/A	N/A	2 Feedback Surveys	100%

WMP.1337 – 8.5.2.4 PSPS Stakeholder Education & Awareness– Non-Focus and Non-Field Verifiable

WMP.1337 emphasizes collaboration with local stakeholders on wildfire mitigation planning and educational outreach efforts. The objective is to expand the exercise program via exercises of increasing complexity to include external stakeholders. SDG&E did not provide a risk reduction goal for this initiative.

The initiative target for 2025 was to host at least one functional PSPS exercise annually including relevant stakeholders. In response to the frontload data request, SDG&E provided two attendance lists for a PSPS Tabletop Exercise and a PSPS Functional Exercise. The lists included attendee information such as role in the exercise and associated agency/company. Event materials such as briefing slides, exercise plan, player brief, and various PPT slides was included. There was a total of 66 attendees for the Functional Exercise and 101 attendees for the Tabletop Exercise.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 56: PSPS Stakeholder Education & Awareness

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Host at least one functional PSPS exercise annually including relevant stakeholders	N/A	N/A	1 PSPS Functional Exercise & 1 PSPS Tabletop Exercise	100%

4.5.2.2 Funding Verification – Findings

Findings are presented in WMP ID order. One initiative in this category exceeds the 10 percent absolute difference threshold under EC AIR Appendix A source precedence. Sub-threshold and embedded initiatives are recorded by reference to the Initiative Summary Table.

WMP.527, 8.5.2, Public Outreach and Education Awareness Program

Initiative Overview: This initiative funds the public outreach and education program supporting customer preparedness for wildfires and Public Safety Power Shutoff events through year-round outreach, partnerships with community-based organizations, multilingual and access-and-functional-needs messaging, and the Public Safety Partner Portal. The initiative is funding and objective-based and does not carry a 2025 unit target.

Financial Performance Analysis

- **Planned Spend:** \$605K
- **Actual Expenditure:** \$535K
- **Variance:** -\$70K underspend, 11.6 percent absolute percent difference

Variance Justification: Per the 2025 EC AIR, the underspend reflects the reprioritization of outreach activities and the deferral of discretionary outreach enhancements, while maintaining core program objectives. SDG&E reports that planned outreach efforts and related expenditures were reviewed throughout the year to confirm continued alignment with program goals and applicable regulatory requirements. The annual budget assumed a level of PSPS-related public education and outreach activity that did not materialize toward the end of 2025.

Operational Impact and Risk Reduction: The 2025 EC AIR documents continued community outreach and public awareness through year-round wildfire safety education; partnerships with community-based organizations, expanded to coastal areas in addition to the HFTD; five wildfire safety fairs; and 131 mini-fairs. The IE did not identify evidence that the variance reduced initiative implementation.

Assessment and Conclusion: EC AIR Appendix A is the controlling source for planned and actual spend, producing an 11.6 percent APD.

WMP.532, Engagement with Access and Functional Needs Populations. Since the absolute percent difference between planned and actual spend for this initiative is 7.0 percent, less than the 10 percent threshold, please refer to Table 54.

WMP.1337, Community Engagement. This initiative carries no WMP-tracked 2025 spend on a standalone basis. Per DR004 Q11, WMP.1337 activity is embedded within WMP.527; please refer to Table 54.

4.5.3 Synthesis of Findings

4.5.3.1 Initiative Review

Both assessed initiatives within this category, Customer Feedback Outreach Surveys (WMP.532) and PSPS Stakeholder Education & Awareness (WMP.1337), achieved 100% completion of their respective qualitative targets. WMP.532 successfully conducted two large-scale customer feedback surveys as required, with pre-season surveys administered in September 2025 and post-season surveys conducted between January and February 2026, each garnering 902 responses and capturing input to inform future public education campaigns, notification strategies, and targeted outreach to Access and Functional Needs (AFN) populations, Limited English Proficiency (LEP) communities, and Tribal stakeholders. WMP.1337 exceeded its minimum requirement by hosting two PSPS exercises in 2025, a functional exercise with 66 participants and a tabletop exercise with 101 participants, engaging relevant external stakeholders including local government agencies, emergency management organizations, and community partners in collaborative scenario-based planning. Neither initiative included quantified risk reduction goals, appropriately reflecting their function as stakeholder engagement and communication capabilities that support broader wildfire mitigation and PSPS program effectiveness rather than directly preventing ignitions. The successful execution of both survey and exercise programs demonstrates SDG&E's operational capacity to maintain customer-facing and stakeholder coordination activities.

4.5.3.2 Funding Verification

For the Community Outreach and Engagement category, the funding review covered three initiatives. WMP.527 exceeds the 10 percent absolute difference threshold under EC AIR Appendix A source precedence, while WMP.532 and WMP.1337 are recorded by reference. The category aggregate remains below the 10 percent threshold, but WMP.527 receives a full finding because its standalone EC AIR Appendix A values exceed the threshold. The IE did not identify evidence that the variance reduced initiative implementation.

5. EVALUATION OF QA/QC PROGRAMS

Quality Assurance and Quality Control (QA/QC) are essential in ensuring the thoroughness and reliability of an EC's operations. This section presents a comprehensive assessment of SDG&E's QA/QC program, utilizing a structured approach based on five key dimensions:

- Roles and Responsibilities
- Quality Culture
- Quality Management System (QMS)
- Quality Inspections and Audits
- QA/QC Technology Adoption

By examining these critical areas, the IE aims to provide a holistic view of the EC's quality practices, highlighting areas of strength, identifying industry-leading best practices, and pinpointing opportunities for enhancement. Each category was scored on a scale ranging from 0-4 and the score demonstrated the EC's maturity in QA/QC implementation: 0 – Not Implemented; 1 – Initiated; 2 – Applied; 3 – Routine; 4 – Mastered. The evaluation framework allows a thorough analysis of how quality is integrated into the EC's structure, culture, systems, and processes.

Roles and Responsibilities – 3 Routine

SDG&E's Roles & Responsibilities dimension achieves Level 3 - Routine maturity level. QA/QC responsibilities are formally defined and documented in standard operating procedures across all programs. Transmission inspection responsibilities are codified in procedure TCM807, which assigns condition assessment duties to Foremen/Supervisors who evaluate components using electronic inspection data and digital photos or conduct field assessments. Distribution QA/QC operates through three distinct programs, Distribution Drone Assessments, Distribution Detailed Inspections, and Transmission & Distribution Wood Pole Intrusive Inspections, each implemented through a shared responsibility model documented in ESP612. The shared responsibility model spans Electric Assets and Compliance (program management, supervision, inspection implementation, governance, and quality assurance advisors), Digital Innovation (scoping, technology enablement, intelligent image processing), SAP/GIS (maintenance plans, record-keeping, traceability, mapping/data quality, reporting), and District operations (field verification, corrective action validation, field oversight). Vegetation Management QA/QC responsibilities are defined in the "Vegetation Management Auditing Activity" procedural document outlining scope and process flow diagrams, with third-party vendor responsibilities defined in service-level agreements. Substation QA/QC responsibilities are documented in procedure 510.004, which assigns inspection duties to qualified electric workers and audit responsibilities to construction supervisors.

Transmission QA/QC accountability operates through supervisory fielding tracked in compliance databases reviewed against CPUC General Order 165 requirements. Distribution programs enforce accountability through ESP612, which governs audit requirements and tracking procedures, with audit results tracked in applicable databases and work management systems documenting

conditions through resolution in accordance with GO 95 and GO 165 timeframes. Vegetation Management maintains accountability through PowerWorkz/Cityworks electronic work management systems where QA/QC work orders are generated, distributed to third-party audit contractors, and tracked with pass/fail rates and historic quality performance metrics shared with contractors on a recurring basis, with repeated fail findings escalated to contractor management. Substation programs enforce accountability through SMMS where supervisors document deficiencies, open maintenance orders with specific mitigation timelines, and possess authority to remove inspection responsibilities from individuals with repeat failures.

Regular communication regarding QA/QC occurs vertically and horizontally throughout the organization. Transmission conducts biweekly inspector meetings reviewing quality concerns and lessons learned from outage investigations, with weekly management meetings providing leadership visibility and monthly meetings with engineering/construction teams reviewing unplanned outages and equipment failures. Distribution communicates audit results to supervisors monthly with quarterly updates to district managers, while severe issues trigger immediate communication protocols. Vegetation Management employs electronic reporting where audit findings are documented at asset level in EpochField, with summary reports tracking contractor trends shared via email upon audit completion and recurring updates provided to internal stakeholders. Substation supervisors conduct periodic team meetings where qualified electric workers discuss lessons learned, safety items, and equipment challenges.

Strong leadership support for QA/QC roles and responsibilities is evident through regular reviews and active oversight. Construction Managers and Senior-level personnel maintain direct QA/QC oversight positions with responsibility for program governance. Transmission leadership participates in monthly meetings with engineering/construction teams where outcomes potentially drive procedural updates to inspection and maintenance practices. Distribution leadership receives quarterly audit summaries and oversees the shared responsibility model across three distinct programs. Vegetation Management leadership engages with annual Sempra Internal Audit Services audits and maintains oversight of third-party vendor performance. Substation Construction Manager authority includes removing inspection responsibilities based on QA/QC performance. Annual procedure review cycles (TCM807 reviewed annually, ESPs updated to reflect programmatic changes, substation procedures reviewed on five-year cycles) indicate systematic leadership review of QA/QC role effectiveness and alignment with changing requirements.

SDG&E's demonstrates integrated QA/QC roles within organizational WMP processes aligned to objectives, accountability mechanisms including systematic tracking and consequences, effective regular communication operating vertically and horizontally, and strong leadership support through regular reviews and active oversight.

Quality Culture – 3 Routine

SDG&E's Quality Culture dimension achieves Level 3 - Routine maturity level. SDG&E provides formal QA/QC training programs across multiple programs. Substation programs require multi-year qualified electric worker (QEW) training where employees learn substation-related technical

tasks and perform operations and maintenance under experienced qualified electric worker (QEW) supervision before qualifying to perform inspections independently. Distribution programs require field crews to complete Corrective Maintenance Program (CMP) refresher training on a biennial basis, with audit trends incorporated into training content. Transmission programs conduct biweekly inspector meetings reviewing quality concerns and lessons learned from outage investigations, with procedural updates communicated during these sessions. These training structures demonstrate that SDG&E provides QA/QC onboarding training to employees conducting QA/QC activities, moving beyond basic awareness to formalized skill development.

Problem reporting mechanisms are established across programs with structured feedback channels. Distribution programs communicate audit results to supervisors monthly with quarterly updates to district managers, while severe issues trigger immediate communication protocols. When QA/QC audits identify findings, supervisors review issues with field crews and provide feedback. Vegetation Management documents audit findings electronically at the asset level in EpochField, with summary reports tracking contractor trends shared via email upon completion and recurring updates provided to internal stakeholders. Repeated fail findings are escalated to contractor management. Substation supervisors document deficiencies in SMMS, open maintenance orders triggering appropriate parties, and meet with inspectors to identify why deficiencies occurred. Transmission programs address QA/QC failures through supervisory review and feedback during biweekly meetings, with additional oversight or training provided for repeat issues.

Quality expectations are known by employees performing QA/QC activities. Substation QEWs understand inspection requirements through multi-year training programs and periodic team meetings where supervisors discuss lessons learned, safety items, and equipment challenges. Distribution field crews receive quality feedback through supervisors monthly and participate in biennial CMP refresher training incorporating audit trends. Transmission inspectors participate in biweekly meetings reviewing quality concerns and lessons learned, with weekly management meetings providing leadership visibility. Vegetation Management contractors receive pass/fail rates and historic quality performance metrics on a recurring basis.

Lessons learned from QA/QC findings are communicated back to field teams through established channels. Distribution supervisors review quality-related concerns with field crews as they arise, with programmatic trends incorporated into biennial refresher training. Transmission programs communicate lessons learned through biweekly inspector meetings and weekly management meetings, with monthly engineering/construction meetings reviewing unplanned outages and equipment failures that may drive procedural updates. Vegetation Management shares QA/QC findings with contractors upon audit completion via email reports, with summary reports tracking performance trends. Substation supervisors conduct periodic team meetings where QEWs discuss lessons learned and findings.

SDG&E's Quality Culture is integrated as an inherent part of company vision, with QA/QC onboarding training provided to employees and contractors conducting QA/QC activities, proactive employee reporting of failures and problems to managers with improvement suggestions, appreciation of employee quality management suggestions, and QA/QC refresher training conducted for employees and contractors involved in QA/QC activities.

Quality Management Systems (QMS) – 3 Routine

SDG&E's Quality Management System (QMS) dimension achieves Level 3 - Routine maturity level. SDG&E has implemented fully digitized QMS platforms with standard formats for documentation across all programs. Transmission QA/QC documentation is maintained in compliance databases tracking supervisory fielding of conditions against CPUC General Order 165 requirements, with inspection results and corrective actions recorded electronically. Distribution programs utilize multiple integrated systems including SAP/GIS for maintenance plans, record-keeping, traceability, mapping/data quality, and reporting, with conditions documented through resolution in work management systems. The Distribution Drone Assessments program processes 100 percent of images through damage detection machine learning models with Inspection Supervisor desktop review of discrepancies. Vegetation Management operates through PowerWorkz electronic work management system with Cityworks server application for creation and issuance of schedule and dispatch work orders, and EpochField field application serving as the electronic database tracking work via GIS mapping platform with activity records for all inventory tree/pole assets maintained with attribute fields and work history. Substation programs document inspections and audits through the Substation Maintenance Management System (SMMS) where supervisors document deficiencies and open maintenance orders.

Processes are standardized and procedures are enforced through documented standard operating procedures. Transmission QA/QC processes are standardized in procedure TCM807, which is reviewed annually, with monthly meetings with engineering/construction teams reviewing unplanned outages and equipment failures potentially driving procedural updates. Distribution QA/QC processes are standardized in ESP612, which governs audit requirements and tracking procedures and is reviewed and updated to reflect programmatic changes as they occur. The three distribution programs (Distribution Drone Assessments, Distribution Detailed Inspections, and Wood Pole Intrusive Inspections) each follow standardized workflows with mandatory checkpoints defined in ESP612 Sections 3.1 and 3.2. Vegetation Management maintains standardized processes documented in the "Vegetation Management Auditing Activity" procedural document outlining scope and process flow diagrams, with processes reviewed annually and updates made accordingly. The QA/QC workflow spans parent Scheduling Work Order creation in Cityworks, contractor creation of child Dispatch Work Orders, field audit execution with findings recorded in EpochField, summary reporting to contractors, retrim DWO issuance for failures, contractor completion, and final summary reporting. Substation QA/QC processes are standardized in procedure 510.004 (Substation Inspector Maintenance Order Reporting and Tracking), reviewed on five-year cycles aligning with standard operating procedure guidelines.

SDG&E maintains centralized digital data repositories enabling easy access and retrieval across programs. Transmission QA/QC data is maintained in compliance databases accessible to appropriate reporting departments, with fielding activity and status tracked and reviewed for consistency with regulatory requirements. Distribution programs maintain data across multiple integrated repositories including SAP/GIS systems for maintenance plans and record-keeping, work management systems documenting conditions through resolution in accordance with GO 95

and GO 165 timeframes, and EPOCH system for wood pole intrusive inspection audits with recent enhancements to develop random samples and consolidate audit findings. Vegetation Management maintains centralized data in PowerWorkz/Cityworks where QA/QC work orders are generated and distributed, with audit findings recorded at individual asset (tree/pole) level in EpochField electronic database using multiple criteria, and summary reports tracking trends in contractor performance shared with contractors and internal stakeholders. All contract workforce personnel access EpochField application loaded onto Panasonic Toughbook hardware. Substation programs maintain data in SMMS where supervisors document deficiencies, open maintenance orders, and issue reports listing inspector, substation, and noted deficiencies, with quarterly totals for inspections and audits captured and reported through SMMS. Documentation states that QA/QC data is accessible and can be shared across all internal SDG&E departments upon request, review, and demand.

SDG&E's Quality Management System indicates advanced digital documentation systems demonstrating integration capabilities across the utility through multiple platforms, optimized processes integrating continuous improvement mechanisms through annual reviews and systematic incorporation of lessons learned, and data management systems with analytical capabilities enabling performance monitoring and metrics including trend analysis, pass/fail tracking, and quarterly reporting across all programs.

Quality Inspections and Audits – 3 Routine

SDG&E's Quality Inspections and Audits dimension achieves Level 3 - Routine maturity level. SDG&E conducts inspections based on up-to-date information to determine high-risk areas with risk-informed targeting. Distribution Detailed Inspections audit 50 percent of potential safety and fire hazard issues in the HFTD identified during inspection. These audits are performed by the District Supervisor within one month following inspection completion, demonstrating immediate response to identified risks. Distribution Drone Assessments process 100 percent of images through damage detection machine learning models with Inspection Supervisor review of discrepancies to validate results, enabling real-time identification of potential fire and safety hazards. Wood Pole Intrusive Inspections require field audits within 1-3 months after inspection to visually verify documented results including drill holes, inspection tags, reject tags, pole data consistency, and severe damage identification. Vegetation Management conducts third-party field audits on approximately 15 percent of all completed VM activities occurring 1-3 months following completion, with representative sample populations created using the randomizer tool in Cityworks. Substation QA/QC performs nine substation audits within the HFTD over a six-month period for a total of 18 audits annually, demonstrating focused targeting of high-risk geographic areas. These inspection approaches demonstrate use of current information including HFTD designation, identified hazards, and machine learning insights to determine high-risk areas requiring audit focus.

Results from inspections and audits are used to identify deficiencies and weaknesses in processes beyond immediate corrective actions. Distribution programs document conditions in applicable systems of record and track these conditions through resolution in accordance with GO 95 and GO 165 timeframes, with supervisors reviewing quality-related concerns with field crews as they arise

and affected teams required to complete CMP refresher training on a biennial basis where trends observed from audits are incorporated into training content. Transmission programs conduct monthly engineering/construction meetings reviewing unplanned outages and equipment failures, with outcomes potentially driving procedural updates to inspection and maintenance procedures. Vegetation Management contractors use audit findings to increase performance, enhance worker knowledge, identify safety issues, and promote compliance, with repeated fail findings tracked and escalated to contractor management. Substation supervisors meet with inspectors to identify why deficiencies occurred when QA/QC audits fail, with authority to remove inspection responsibilities from individuals with repeat failures. Distribution programs reference ESP612 that allows desktop reviews when sufficient photographic documentation exists to perform complete audits per Section 3.3.3, demonstrating process refinement based on audit insights. Wood Pole Intrusive Inspections implemented EPOCH system enhancements to develop random samples and consolidate potential audit findings into succinct drop-down lists, demonstrating systematic process improvement based on operational experience.

Quality of inspection is assessed through SME reviews at least twice per year across programs. Transmission conducts biweekly inspector meetings reviewing quality concerns and lessons learned from outage investigations, with weekly management meetings providing leadership visibility and monthly engineering/construction meetings reviewing unplanned outages and equipment failures, resulting in multiple SME reviews throughout the year. Distribution communicates audit results to supervisors monthly with quarterly updates to district managers, providing at minimum quarterly SME review cycles. Vegetation Management reviews standardized processes annually with updates made accordingly, and Sempra's Internal Audit Services Department conducts annual audits of the Vegetation Management Department with scope potentially including operational processes, financial compliance, regulatory compliance, and contract management. Substation supervisors conduct periodic team meetings where QEWS discuss lessons learned, safety items, and equipment challenges, with QA/QC performing 18 audits annually (nine substations audited twice per year within HFTD). External reviews by CPUC and OEIS include record reviews for conformance with maintenance requirements and field audits to verify system conditions, with ad hoc field investigations in response to specific incidents.

SDG&E's Quality Inspections & Audits demonstrate inspections conducted based on up-to-date information including HFTD designation, identified hazards, and machine learning insights to determine high-risk areas, systematic use of results from inspections and audits to identify deficiencies and weaknesses in processes with incorporation into training and procedural improvements, and quality of inspection assessed through SME review at least twice per year through biweekly/monthly internal reviews, quarterly reporting cycles, annual internal audits, and external regulatory reviews across all programs.

QA/QC Technology Adoption – 2 Applied

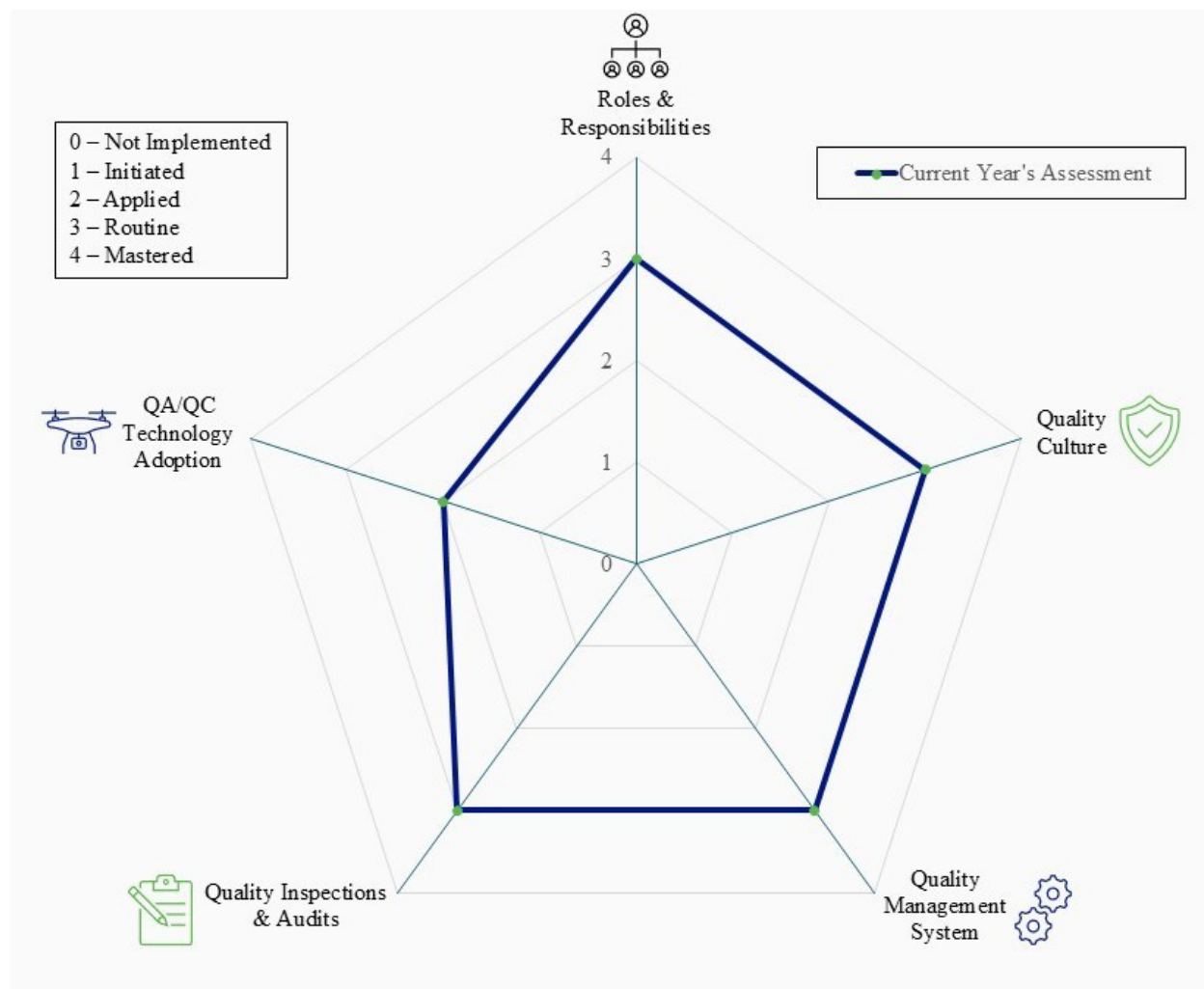
SDG&E's Technology Adoption dimension achieves Level 2 - Applied maturity level. SDG&E utilizes drones for inspections with automated data collection capabilities that enhance efficiency and accuracy. Distribution Drone Assessments process 100 percent of images collected during inspections through damage detection machine learning models, with Inspection Supervisors

reviewing discrepancies identified by the models to validate results. This technology reduces the need to travel to remote field locations for initial hazard identification and enables high-resolution imagery collection for desktop review. The drone inspection program focuses solely on identifying potential fire and safety related hazards in the HFTD, demonstrating targeted application of technology to high-risk areas. Distribution programs reference ESP612 Section 3.3.3 that allows desktop reviews when sufficient photographic documentation exists to perform complete audits, stating "A structure does not require a field visit if it is not required because there is sufficient photographic documentation to perform a complete audit of the inspection or repair result." SDG&E employs LiDAR technology for vegetation management quality verification. Vegetation Management uses LiDAR validation as part of its QA/QC approach to verify compliance with clearance requirements. The utility is considering expanded use of LiDAR as an augmentation to its QA/QC program for widely applicable compliance audits, with evaluation considerations including regulatory funding, scope, and scaling operations. Vegetation Management has also begun designing and developing a QA/QC procedure using photo documentation for validation and auditing post-pole clearing activity as an alternative or replacement for field visits to audit pole clearing activities.

Digital platforms support data collection and management across programs. Transmission QA/QC documentation is maintained in compliance databases tracking supervisory fielding of conditions. Distribution programs utilize SAP/GIS systems for maintenance plans, record-keeping, traceability, mapping/data quality, and reporting, with work management systems documenting conditions through resolution. Vegetation Management operates through PowerWorkz electronic work management system with Cityworks server application for creation and issuance of schedule and dispatch work orders, and EpochField field application serving as the electronic database tracking work via GIS mapping platform with activity records for all inventory tree/pole assets maintained with attribute fields and work history. All contract workforce personnel use the EpochField application loaded onto Panasonic Toughbook hardware, demonstrating deployment of handheld technology to improve efficiency in data collection. Substation programs document inspections and audits through SMMS with employees using assigned Mobile Data Terminals (laptops) for data entry and tracking.

SDG&E's QA/QC Technology Adoption utilizes drones for Distribution Drone Assessments processing 100 percent of images through machine learning models, LiDAR technology employed for vegetation management compliance verification, enhanced efficiency through automated data collection and desktop review capabilities reducing field visit requirements, and improved accuracy leveraging high-resolution imagery and precise measurements.

Figure 15: QA/QC Maturity Sunburst Chart



6. CONCLUSION

The IE has completed a comprehensive validation of San Diego Gas & Electric Company's 2025 Wildfire Mitigation Plan initiatives across five categories: Grid Design, Operations, and Maintenance; Vegetation Management and Inspections; Situational Awareness and Forecasting; Emergency Preparedness; and Community Outreach and Engagement. This assessment evaluated a total of 46 initiatives through detailed review of frontload data, quarterly data reports, annual reports, field verification activities, and targeted data requests. Of the 46 initiatives reviewed, the IE validated 36 initiatives, representing a 78 percent overall validation rate. Ten initiatives did not meet the Energy Safety 95 percent initiative validation threshold and were not validated by the IE.

The validated initiatives demonstrate SDG&E's commitment to wildfire risk mitigation across multiple wildfire categories. In Grid Design, Operations, and Maintenance, 24 of 33 initiatives achieved validation, with notable successes including Distribution Overhead Hardening (Covered Conductor) at 104 percent, Strategic Undergrounding at 116 percent, and Lightning Arrester Removal and Replacement at 1,128 percent of target. Vegetation Management and Inspections showed particularly strong performance, with all six initiatives validated, including Detailed Inspections at 105 percent and Clearance activities at 107 percent of target. Situational Awareness and Forecasting contributed two validated initiatives, while Emergency Preparedness and Community Outreach and Engagement each contributed two validated initiatives, all achieving 100 percent validation rates. These validated initiatives demonstrate effective execution, accurate reporting, and appropriate workmanship across SDG&E's wildfire mitigation portfolio.

The ten non-validated initiatives fell below the 95 percent threshold for various reasons, primarily related to target shortfalls rather than quality deficiencies in completed work. Notable examples include Expulsion Fuse Replacement at 72 percent, PSPS Sectionalizing at 90 percent, Advanced Protection at 88 percent, and Hotline Clamps Maintenance at 12 percent of target. Additionally, WMP.545 (Distribution Underbuild) reported zero completions in 2025 due to environmental and weather delays, though the three-year cycle target was exceeded. Where field verification was conducted on non-validated initiatives, the IE confirmed that completed work met applicable standards and specifications; the validation shortfalls reflect incomplete annual scope rather than deficient workmanship or documentation quality.

The IE's funding-variance review identified 31 of 58 initiatives (53 percent) with absolute percent differences exceeding 10 percent between planned and actual 2025 spend. However, the headline variance overstates implementation impact, as many material variances are attributable to reporting basis, cost reclassification, capital sequencing, denied-amendment baselines, and embedded costs rather than reduced delivery. Notable examples include vegetation cost aggregation under WMP.494, FERC funding reclassifications, capital resequencing of approximately \$5.9M from WMP.519 into 2026, and event-driven response costs associated with January 2025 PSPS activations totaling approximately \$10.7M. The IE did not identify evidence that these variances reduced initiative implementation. Forecast completeness, rather than funding adequacy, drives several variances, suggesting that pairing future forecasts with documented event-response and multi-year capital assumptions would reduce headline variance in subsequent WMP cycles.

SDG&E's 2025 WMP implementation demonstrates consistent execution of approved mitigation strategies with validated completion of 36 of 46 initiatives. The IE's field verification activities confirmed alignment between reported data and actual installations across multiple hardening, inspection, and operational initiatives. While ten initiatives require attention to meet 2025 targets in future reporting cycles, the overall implementation reflects meaningful progress toward wildfire risk reduction objectives. Non-validated outcomes are primarily records or source-control items rather than broad installation failures. Advanced Protection (WMP.463) fell short at 7 of 8 circuits due to incomplete SCADA equipment commissioning; QA/QC of Distribution Detailed Inspections (WMP.491) and QA/QC of Substation Inspections (WMP.1194) reflect audit-record consistency issues rather than quality deficiencies. SDG&E should prioritize addressing the root causes of target shortfalls, including resource constraints, permitting delays, and scope adjustments, to enhance implementation rates in subsequent WMP cycles and strengthen overall wildfire mitigation effectiveness.

7. ATTACHMENTS

- 7.1 CATALOG OF INITIATIVES**
- 7.2 DATA REQUESTS**
- 7.3 SME INTERVIEWS**
- 7.4 PICTURES OF NON-CONFORMANCE**