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Docket # 2026-IE

Patrick Doherty
Program Manager, Compliance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: SDG&E Comments on Independent Evaluator 2025 WMP Annual Implementation Report

Dear Program Manager Doherty:

SDG&E hereby provides comments to the Independent Evaluator's (IE) Final Independent Evaluator Annual Implementation Report (IE Report) on SDG&E's 2025 Wildfire Mitigation Plan (WMP) released on July 10, 2026. SDG&E appreciates the IE's acknowledgements that the principal physical and program work was validated, that several initiatives overdelivered against the WMP target, and that many material funding variances were attributable to reporting basis, timing, denied-amendment baselines, cost reclassification, capital sequencing, and embedded costs rather than reduced delivery.¹ SDG&E respectfully requests that Energy Safety consider these comments when assessing SDG&E's compliance with its 2025 WMP.

¹ IE Report, pg. 8-13

I. COMMENTS TO SPECIFIC ITEMS WITHIN THE INDEPENDENT EVALUATOR REPORT

A. Expulsion Fuse Replacement, WMP.459

SDG&E requests Energy Safety consider the impact of accelerated work completed in 2024, during which Expulsion Fuse Replacements exceeded target by 88%² on 2025 performance. SDG&E achieved a three-year cycle completion rate of 748 installed fuses against a target of 799, representing a 96% completion rate. Given this demonstrated progress and the validated field work SDG&E requests that Energy Safety evaluate performance at the cycle level rather than relying solely on annual results, which may not accurately reflect overall implementation effectiveness.

B. PSPS Sectionalizing, WMP.461

SDG&E acknowledges that 9 of 10 sectionalizing switches were completed in 2025. However, this program exceeded the total target for the 2023-2025 cycle, completing 37 switches compared to the target of 30 (123% completed) thus the cumulative three year risk reduction is higher than originally forecasted. SDG&E requests that Energy Safety consider this initiative in the context of cycle-level performance and validated field work, rather than treat the annual increment as evidence of deficient implementation.

C. Advanced Protection, WMP.463

SDG&E acknowledges that 7 of 8 circuits were completed in 2025, as reported in the IE Report³, and requests Energy Safety consider that the final circuit was completed in April 2026 as soon as the required permits were obtained. The detailed permitting restraints related to this program were presented in SDG&E's 2025 AIR⁴. Accordingly, SDG&E requests that performance be assessed based on overall completion and validated implementation efforts rather than the annual milestone.

² SDG&E 2024 WMP Annual Report on Compliance, pg. 38

³ IE Report, pg. 28

⁴ SDG&E 2025 WMP AIR, pg. 33

D. Hotline Clamps, WMP.464

SDG&E acknowledges that 110 of 950 clamps were completed in 2025. However, this program exceeded the total target for the 2023-2025 cycle, completing 1,751 clamps compared to the target of 1,450 clamps (121% completed) thus the cumulative three year risk reduction is higher than originally forecasted.. SDG&E requests that Energy Safety consider this initiative in the context of cycle-level performance and validated field work, rather than treating the annual increment as evidence of deficient implementation.

E. Transmission Overhead Detailed Inspections, WMP.479

SDG&E acknowledges that 2,184 of 2,479 inspections were completed in 2025. However, this program exceeded the total target for the 2023-2025 cycle, completing 7,052 inspections compared to the target of 6,826 inspections (103% completed). The Transmission Overhead Detailed Inspection program is managed as a continuous maintenance cycle that supports system reliability, operational needs, and grid fluidity. Accordingly, certain inspections may be completed in the preceding or subsequent year without affecting the program's effectiveness or risk-reduction benefits. Further, SDG&E's maintenance practices have been validated through CAISO and CPUC oversight and are reflected in continued transmission system reliability and asset availability. SDG&E requests that Energy Safety consider this initiative in the context of cycle-level performance and validated field work, rather than treating the annual increment as evidence of deficient implementation.

The IE's conclusion about not satisfying risk reduction goals lacks clarity and context critical to risk methodology and forecasting. For inspection programs, actual risk reduction may also differ from forecast because the AIR calculates achieved risk reduction based on actual findings, including the number and severity of critical issues identified. As a result, even where inspection targets were met, actual risk reduction may be lower where fewer critical findings were found than expected.

F. Distribution Underbuild, WMP.545

SDG&E acknowledges that zero of 1.8 miles were completed in 2025. However, this program exceeded the total target for the 2023-2025 cycle, completing 24.3 miles compared to the target of 9.9 miles (245% completed). SDG&E requests that Energy Safety consider this

initiative in the context of cycle-level performance and validated field work, rather than treating the annual increment as evidence of deficient implementation.

G. Distribution Communications Reliability Improvements (DCRI), WMP.549

As described in the ⁵ AIR⁶, four of five base stations were completed in 2025. The fifth target was not met due to a field change order to avoid existing slurry beneath the original proposed location that prevented scheduled work from proceeding. Once the issue was resolved, the remaining base station was completed in January 2026. Although the annual target was not fully achieved, the shortfall amounted to a single unit (one base station), resulting in an 80% completion rate. Given the small number of planned installations, missing one unit can create the appearance of a significant percentage variance that may not accurately reflect overall implementation performance. SDG&E respectfully requests that Energy Safety consider the underlying circumstances, including the completion of four of the five planned installations within 2025 and the completion of the final base station shortly thereafter in January 2026. Evaluating performance in the context of actual units completed and the minimal delay involved would provide a more representative assessment of implementation success.

H. Air Quality Index Sensor Installation, WMP.970

As the IE report indicates ⁷ Air Quality Index Sensor Installation (WMP.970) was not a program in 2025. As stated in the 2025 WMP Update⁸, “The Air Quality Management Program installed 15 particulate sensors between 2022 and 2023. The last remaining particulate sensor was installed by the end of 2023. Eighteen total sensors have been procured, one of which is used as a master unit for calibration and as an additional spare. Once installed, the 16 sensors will completely cover the HFTD and further installations would not provide additional benefit. Therefore, this program was discontinued at the end of 2023.”

⁶ SDG&E 2025 WMP AIR, pg. 33

⁷ IE Report, pg. 87

⁸ SDG&E 2023-2025 WMP, Rev 5, pg. 307

Air Quality Sensor Maintenance (WMP.1432) was added to the WMP in 2025, targeting maintenance and calibration of the particulate sensors, and in place of Air Quality Index Sensor Installation. Air Quality Sensor Maintenance achieved target in 2025.

I. QA/QC Substation Inspections, WMP.1194

For QA/QC Substation Inspections (WMP.1194), SDG&E respectfully disagrees with the characterization that the Miguel audit was counted twice when only one audit was performed⁹. The two audit records represent separate inspections of two distinct switchyards at the Miguel Substation (230 kV and 500 kV), each requiring its own audit and supporting documentation. Similarly, Glencliff was selected for audit during both the first and second halves of the year through the established random selection process. Accordingly, SDG&E requests that Energy Safety consider this additional context when evaluating the IE's conclusion regarding WMP.1194.

II. CONCLUSION

SDG&E thanks Energy Safety for this opportunity to comment on the IE Report, and respectfully requests that Energy Safety and the IE take these recommendations into account when considering the report.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company

⁹ IE Report, pg. 58