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VIA ELECTRONIC FILING

Docket #WMP-Guidelines

Tony Marino
Deputy Director
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Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: SDG&E Comments on Draft WMP Guidelines

Dear Deputy Director Tony Marino:

San Diego Gas & Electric (SDG&E) hereby provides comments on the Office of Energy Infrastructure Safety's (Energy Safety's) Draft Wildfire Mitigation Plan (WMP) Guidelines (Draft Guidelines) issued on September 1, 2026.

I. DATA REQUESTS

A. The response deadline for data requests outside the WMP review period should be based on business days

Regarding data requests outside the WMP review period, the Draft Guidelines state that "Unless a different response period is provided by Energy Safety, an electrical corporation (EC) must respond to all WMP-related data requests outside of the WMP review period by 5:00 p.m. on the tenth day."¹ To ensure consistency with the other sections of the Draft Guidelines related to data requests, SDG&E requests that this requirement be modified to specify that responses are due on the "tenth business day" rather than the "tenth day."

B. Data requests issued to an electrical corporation should include certain information

The Draft Guidelines require that an EC keep a WMP Data Request Log that is cumulative of all WMP data requests it receives and data request responses it provides during the

¹ Section 6.2 of Draft Guidelines at p. II-19

WMP period and prescribes a table template to be used.² The table template included in the Draft Guidelines requires that the EC include, among other information, the WMP Section, category, and subcategory of each data request question received. However, based on data requests SDG&E has received in prior WMP cycles, this information is not always clear in each data request question.

Accordingly, SDG&E requests that Energy Safety modify the Draft Guidelines to require that any data request sent to an EC must identify the (1) WMP Section, (2) Category, and (3) Subcategory for each question in the data request. This modification will provide the EC with the necessary information to accurately and thoroughly complete the required WMP Data Request Log. This will also ensure consistency between the EC and data request issuer and eliminate the need for the EC to make an educated guess as to which section, category, and subcategory the question is related to.

II. REVISIONS FOR GENERAL RATE CASE ALIGNMENT

A. The first column of the GRC-to-WMP crosswalk may need to be corrected, the “GRC Decision Year” should be changed to “GRC Test Year” and a new column should be added titled “Applicable GRC Year”

The Draft Guidelines require the General Rate Case (GRC)-to-WMP crosswalk to include a column titled “WMP Year and GRC Decision Year,” followed by a separate column titled “GRC Decision Year.”³ The instructions for the first column, however, direct the EC to report only the applicable WMP year, while the instructions for the second column direct the EC to report the corresponding GRC decision year, such as Test Year plus one. As drafted, the first column heading is therefore inconsistent with its accompanying instructions and appears to duplicate information required in the second column.

To avoid ambiguity and promote consistent reporting across ECs, SDG&E recommends that Energy Safety revise the first column heading from “WMP Year and GRC Decision Year” to “WMP Year.” The second column should be revised to “GRC Test Year” and a new column should be added titled “Applicable GRC Year.” This revision would clearly distinguish between the year of the approved WMP commitment being revised and the corresponding year reflected in the GRC decision while still showing a clear connection to the relevant GRC test year. For example, if SDG&E proposes an amendment to its 2029 WMP target, the “GRC Test Year” column would state “2028” and the “Applicable GRC Year” would state “2029” and match the “2029” in the “WMP Year” column.

B. GRC to WMP crosswalk granularity needs to be clarified

The Draft Guidelines require each change in a Revised WMP to demonstrate a granular and detailed connection between an approved WMP commitment and the associated revenue authorization in the GRC decision. SDG&E appreciates that the Draft Guidelines recognize that

² Section 6.1.1 of Draft Guidelines at pp. II-17 and II-18

³ Section V.1 of Draft Guidelines at p. V-3

GRC program identifiers do not need to correspond to WMP activities on a one-to-one basis and permit use of the most granular information available. To avoid ambiguity, SDG&E recommends clarifying that where a GRC decision authorizes revenue at a portfolio, program, or cost-category level, an EC is not required to create activity-level revenue allocations that were not adopted by the California Public Utilities Commission (CPUC) and may instead:

- Identify the relevant GRC portfolio, program, cost category, or other authorized funding source.
- Explain the relationship between the authorized revenue and the affected WMP activity or activities.
- Describe any reasonable allocation used by the EC for implementation or tracking purposes.
- Identify limitations where the GRC decision and adopted supporting documents do not provide sufficient information to assign an activity-specific authorized amount.

This clarification would preserve the GRC-to-WMP crosswalk as a transparency and traceability tool while avoiding program-level funding assumptions that could constrain the EC's ability to optimize its wildfire mitigation portfolio based on risk, technology, project conditions, implementation considerations, and portfolio efficiencies. It would also provide flexibility to the CPUC on how GRC decisions for wildfire mitigation activities are authorized in GRCs, allowing for revenue authorization at the activity and/or portfolio level.

C. The Revised WMP process should provide reasonable flexibility when the GRC decision does not contain sufficient implementation detail

The Draft Guidelines require an EC to submit a Revised WMP within 45 days of a GRC decision or any subsequent CPUC order modifying that decision.⁴

SDG&E supports timely alignment of an approved WMP with the CPUC's revenue authorization. However, completing all required implementation and risk analyses within 45 days may not be practicable if the GRC decision does not provide granularity consistent with the WMP expectations (*e.g.*, overall wildfire portfolio revenue requirement; a settlement without activity-level allocations). Depending on the granularity of the GRC decision, the EC may need to determine how the authorized revenue requirement should be allocated across programs before evaluating resulting changes to WMP activities. An EC may then need to evaluate the effects of the authorized funding on the wildfire mitigation portfolio as a whole, including the scope, feasibility, sequencing, and timing of mitigation activities. A reduction or modification in authorized revenue does not necessarily translate proportionally to a specific reduction in an individual WMP activity or target. Instead, the EC may need to evaluate a different mix of

⁴ Section V of Draft Guidelines at p. V-1

mitigations to preserve maximum feasible risk reduction within the overall authorized funding level.

Accordingly, SDG&E recommends that Energy Safety clarify that an EC may request reasonable procedural relief when information necessary to complete the Revised WMP is not available from the GRC decision or when additional analysis is necessary to ensure that the revisions are accurate, risk-informed, and internally consistent.

Energy Safety should recognize that the EC may need to rebalance mitigation activities within the authorized wildfire portfolio. The EC should retain the flexibility to adjust the mix and timing of mitigation activities where changes in risk, project conditions, technology, feasibility, or portfolio efficiency support a different mitigation strategy. The Revised WMP should explain the resulting portfolio and target changes, but it should not require the EC to preserve an activity-level allocation or target that the CPUC did not expressly adopt.

This approach would support timely alignment and transparency while recognizing the multi-year nature of wildfire mitigation programs, avoiding unfounded activity-level allocations and preserving the flexibility necessary to optimize wildfire risk reduction within the CPUC-authorized revenue requirement.

III. PROCESS AND EVALUATION – RAMP AND GRC GUIDELINES

D. The notification period for RAMP or GRC changes should be revised to account for changes made less than 45 days from the WMP submission date.

Section II.2.1 of the Draft Guidelines states that if there are changes to an EC's Risk Assessment Mitigation Phase (RAMP) or GRC application submission date that require an updated WMP submission schedule, the EC "must email the ESPD Program Manager and, when applicable, the assigned ESPD staff lead notifying them of the change no less than 45 days prior to its scheduled WMP submission date."⁵ However, this timeline may not be feasible if an EC becomes aware of changes less than 45 days prior to the scheduled WMP submission date or after a WMP submission.

SDG&E recommends the language be revised to state that the EC will provide notification at least 45 days prior to the scheduled WMP submission date when feasible. If the scheduled WMP submission date is less than 45 days away at the time of the schedule change, the EC should be able to provide notice within five business days of receiving notice of a change to the RAMP or GRC application submission date.

IV. VEGETATION MANAGEMENT

E. Clarification is needed for the intended applicability of "dynamic climate change risks" when establishing clearance distances

SDG&E supports consideration of climate-related vegetation risks as part of wildfire risk management. However, vegetation clearances are established for shorter duration timeframes

⁵ Section 2.1 of Draft Guidelines at p. II-2

based on compliance requirements, ignition prevention, and tree conditions within the annual inspection and pruning cycle.

The “Clearance” subsection of Section 11.2.1 states that “The electrical corporation must also describe how it incorporates dynamic climate change risks (e.g., drought, tree mortality trends, changes in tree growth rates) when establishing or modifying vegetation clearance distances.”⁶ At present, SDG&E is not aware of a validated industry-standard methodology or a commercially available tool capable of translating drought conditions, tree mortality trends, changing growth rates, or other climate-related variables into specific vegetation clearance prescriptions at the asset level. Accordingly, SDG&E recommends that Energy Safety allow utilities to demonstrate consideration of climate-related risks through documented risk-assessments and processes informed by subject matter expertise rather than requiring a climate-adjusted clearance methodology that is not currently supported by established industry standards or technically feasible for implementation.

F. “Technologies and techniques” for measuring clearance distances should be modified

In the “Clearance” subsection of Section 11.2.1, the first sentence states, “The electrical corporation must specify the technologies and techniques it uses to measure clearance distances....”⁷ SDG&E recommends changing “technologies and techniques” to “technologies or techniques,” recognizing that an EC may not utilize a specific technology as a method to measure clearance distances.

G. Clarification is needed on the use of risk analysis to determine an “elevated” probability of ignition and wildfire spread

In Section 11.9.1, the Draft Guidelines state, “The electrical corporation must describe how it assigns or restricts vegetation management activities in advance of an elevated probability of ignition, wildfire spread, or both.”⁸ Regarding “elevated probability of ignition,” Vegetation Management does not use specific modeling outputs to determine probability of ignition in its day-to-day work, nor is it used to determine weather-related restrictions specific to vegetation management activities. Instead, SDG&E recommends the continued use of its daily-generated Fire Potential Index (FPI) within each of its Districts to guide operational decision-making for at-risk activities which could include, for example, ceasing work or redirecting contractor resources to areas of reduced risk. Decisions related to operational mitigations needed to perform activities are based on operational procedures, environmental conditions, fire danger thresholds, safety considerations, and regulatory requirements. SDG&E recommends changing the language to, “The electrical corporation must describe when and how it redirects or restricts vegetation management activities in advance of elevated risk.”

⁶ Section 11.2.1 of Draft Guidelines at p. III-150

⁷ Section 11.2.1 of Draft Guidelines at p. III-150

⁸ Section 11.9.1 of Draft Guidelines at p. III-166

H. SDG&E recommends combining Table 11-5 and Table 11-6

In Section 11.3.5, Table 11-5 requires the utilities to commit to reporting specific timeframes between the number of days the EC identifies and resolves a constraint.⁹ Resolution timeframes for different constraint types are highly variable and dependent on external factors outside the control of SDG&E. Therefore, requiring utilities to establish specific, achievable timeframes may not be feasible. SDG&E contends that an intermediate resolution date is not as illustrative or indicative as the remediation date of an EC's timely management of constraints. SDG&E currently tracks the constraint identification date and remediation date. Additional tracking and recording of the constraint resolution date would require modification of SDG&E's current vegetation database, which would increase costs related to this activity.

SDG&E supports Energy Safety's goal of Backlog Elimination and recommends combining Table 11-5 and Table 11-6 and modifying the requirement of this combined table to report the Constraint Timeframe as the Number of Days between Constraint Identification and Constraint Remediation.

V. WMP UPDATES

I. Energy Safety should establish an EC-initiated notice process for potential WMP Update filings

SDG&E supports Energy Safety's adoption of an event-driven approach to WMP updates that allows approved plans to remain responsive to material changes in wildfire risk, new information, program performance, and legislative or regulatory requirements without imposing recurring annual filing obligations. However, the Draft Guidelines place the responsibility for initiating a WMP Update filing exclusively with Energy Safety. As currently drafted, only Energy Safety may require an update, with the notice to the EC defining the scope of the requested changes.¹⁰ An EC may not include changes beyond the defined scope nor initiate an update on its own.

While SDG&E agrees that Energy Safety should retain ultimate authority regarding whether a WMP Update filing is required and the scope of any such filing, the Draft Guidelines do not provide a mechanism for an EC to notify Energy Safety when the EC identifies a material development that may warrant consideration of a WMP Update. Given that ECs are well positioned to identify significant changes in risk conditions, program performance, operational experience, facility and equipment changes, legislative implications, etc., SDG&E recommends that Energy Safety establish an EC-initiated notice process through which an EC may request that Energy Safety evaluate whether a WMP Update Filing is appropriate. Specifically, SDG&E recommends a notice and determination process which would allow an EC to submit a "Electrical Corporation WMP Update Notice" (Notice) when it determines that a material development may warrant an update to its approved WMP. The Notice would describe the changed circumstance, its materiality, the affected WMP provisions and years, and the proposed

⁹ Section 11.3.5 of Draft Guidelines at p. III-155

¹⁰ Section VI of Draft Guidelines at pp. VI-1 and VI-2

scope of the update. Energy Safety would respond within 30 days, determining whether the requested update is indeed required and/or provide modifications to the EC's proposed filing scope. ECs would then have 90 days to file the WMP Update.

This change to the WMP guidelines would not authorize an EC to unilaterally revise an approved WMP, rather it would establish a transparent mechanism through which utilities can promptly bring material developments to Energy Safety's attention. It would also enable Energy Safety to make an informed determination before the EC moves forward with a WMP Update filing. This preserves Energy Safety's regulatory oversight while avoiding the risk that an approved WMP will remain unchanged despite information indicating that a material adjustment should be considered.

J. Energy Safety should establish a three-pronged approach to WMP Update Filing types

In addition to allowing ECs to initiate WMP update filings, the WMP Guidelines should establish three distinct pathways for modifying an approved WMP over the course of a four-year planning cycle. While the Draft Guidelines already recognize the Petition to Amend process and other significant changes processes,¹¹ SDG&E recommends the addition of one supplemental pathway: Ministerial WMP Updates. The addition of this pathway would provide a practical and transparent framework for managing minor changes that arise during implementation while maintaining appropriate regulatory oversight.

A Ministerial WMP Update should be available for routine administrative adjustments that do not materially affect risk reduction outcomes, program scope, strategic intent, or the overall wildfire mitigation strategy reflected in the approved WMP. This pathway would provide a streamlined mechanism for addressing minor implementation changes that commonly arise during execution of a multi-year plan while preserving transparency and oversight.

Proposed criteria for submitting ministerial changes are:

- Targets not met in the performance year but that will be met over the course of the three-or four-year WMP period. These requests could be submitted with updated Annual WMP Tabular Data. Examples of triggering events could include permitting delays, easement constraints, or change in vendor.
- Target changes must be no more than +/-25 percent for 100 or more units, +/-20 percent for less than 100 units and over 10 units, and no more than +/- 2 units for less than 10 units.
- Expenditure changes of less than \$25 million or less than 20 percent of an initiative's planned total expenditure within the performance period.

Ministerial WMP Updates should be submitted directly to the Performance Assurance Division with supporting documentation. Since the changes are ministerial in nature, no Update

¹¹ Section V of Draft Guidelines at pp. V-1 and V-2

Notice would need to be submitted nor would permission from Energy Safety be required prior to submittal.

VI. SUBMISSION REQUIREMENTS

K. Energy Safety should revise submission requirements to recognize ensuring maximum risk reduction in light of a GRC funding reduction may not be feasible

In Section V.1, the Draft Guidelines state that the supporting narrative for a revised WMP submission must “Discuss the EC’s plans to adjust other mitigation activities to ensure maximum overall risk reduction and to address any gaps created in its wildfire mitigation portfolio due to the changes necessary to conform with the CPUC’s revenue authorization in the GRC decision.”¹² However, an EC may or may not be able to offset risk reduction for initiatives that do not receive full funding approval.

SDG&E recommends revising the Draft Guidelines to recognize that, following a reduction or modification in authorized revenue, an electrical corporation should seek to maximize risk reduction within the authorized revenue requirement and explain how it has addressed plans to manage potential gaps in its overall portfolio.

VII. RISK METHODOLOGY AND ASSESSMENT

A. The “Units” column in Table 7-1 should be removed

SDG&E requests clarification regarding the Units column included in Table 7-1.¹³

Individual datasets may contain multiple variables with different units of measure (*e.g.* Historical Wind Weather Dataset could include date, time, miles per hour, weather station name, numerical ID, and humidity percentage). As a result, requiring a single unit designation for each dataset may not accurately represent the underlying data and could create confusion regarding the interpretation of the information presented. In many cases, datasets used as model inputs are comprised of multiple fields with distinct units, making a dataset-level Units column difficult to complete consistently.

Accordingly, SDG&E recommends that Energy Safety remove the Units column from Table 7-1. Alternatively, if Energy Safety determines that unit information is necessary, SDG&E recommends providing flexibility to identify multiple units or to document unit information elsewhere, where appropriate, rather than requiring a single unit designation for each dataset. SDG&E also recommends that where standard work units and unit costs are not available, the utilities would include an explanation as to why they are not available, similar to Risk Spending Accountability Reports (RSAR) and the reporting rules.¹⁴

¹² Section V.1 of Draft Guidelines at p.V-2-V-3

¹³ Section 7.3.1 of Draft Guidelines at p. III-34

¹⁴ Decision (D.) 22-10-002

VIII. MITIGATION STRATEGY

A. Consideration of overhead costs should be removed from the mitigation activity selection process

In Section 8.1.3, the Draft Guidelines state that the calculation of the cost of a mitigation activity must include “An overarching narrative... [that] must include a discussion of direct costs and overhead costs for its mitigation activities, and if and how those costs are incorporated into its mitigation activity selection process.”¹⁵

SDG&E’s mitigation prioritization is grounded in the Commission’s Risk-Based Decision-Making Framework (RDF) and associated Benefit-Cost Ratio (BCR) methodology as described in the current RAMP filing. Mitigation alternatives are evaluated using projected risk reduction and lifecycle costs to support risk-informed investment decisions. Consistent with this approach, SDG&E evaluates costs that are directly attributable to mitigation implementation and long-term operation aligned with the RAMP and GRC filings, which do not include indirect costs such as overhead costs.

For example, when evaluating lifecycle costs, SDG&E evaluates costs such as implementation costs, ongoing operations and maintenance (O&M) costs, long-term foundational costs, and net O&M savings over the life of a mitigation. For grid hardening implementations, these costs are incorporated into lifecycle cost assessments and BCR analyses used to evaluate and prioritize wildfire mitigation investments. Operational mitigations are similarly evaluated based on the costs associated with implementing and sustaining those hardened assets. Company overhead costs are not included.

Accordingly, SDG&E recommends that Section 8.1.3 focus on the cost elements currently used to support mitigation selection and cost-effectiveness evaluations, including:

- Implementation (capital and O&M) costs
- Ongoing O&M costs
- Lifecycle cost considerations
- Net O&M savings or avoided future costs, where applicable

If the intent is to require overhead costs to be incorporated into mitigation selection methodologies, SDG&E recommends that such a requirement be considered through a future RAMP and/or GRC proceeding, where standardized methodologies and implementation expectations can be developed collaboratively.

SDG&E proposes the following revision, “The EC should provide a narrative description of how cost considerations are incorporated into its wildfire mitigation activity selection process, including implementation costs, operations and maintenance costs, lifecycle cost considerations, and net O&M savings or avoided costs, where applicable.”

¹⁵ Section 8.1.3 of Draft Guidelines at p. III-63

B. Clarification is needed for the scope of activities to be included in the Cost Impact Analysis

SDG&E requests clarification regarding the scope of the cost information required under Section 8.1.3 of the Draft Guidelines.¹⁶ SDG&E interprets the objective of this section to be the evaluation of costs that are directly associated with the wildfire mitigation activity selection process, specifically those costs used to compare, prioritize, and select mitigation alternatives.

By contrast, foundational activities and supporting operational capabilities, such as situational awareness, weather monitoring, data systems, analytics platforms, and model development, are generally not evaluated as discrete mitigation alternatives within the mitigation selection process. These activities support wildfire mitigation and operational decision-making but are not typically compared or prioritized using the same cost-effectiveness frameworks applied to mitigation activities. Applying cost analysis requirements described in Section 8.1.3 to these activities could therefore result in inconsistent and potentially misleading comparisons.

Accordingly, SDG&E recommends that Energy Safety clarify that Section 8.1.3 applies only to mitigation activities that are directly evaluated through the wildfire mitigation activity selection process, including grid hardening investments and operational mitigation activities such as inspections, maintenance, repairs, and vegetation management, and does not apply to foundational activities or supporting operational capabilities.

C. The methodology used for the cost per avoided ignition portion of the cost impact analysis should be revised

SDG&E appreciates Energy Safety's objective of developing a standardized cost-per-avoided ignition metric to improve transparency and support comparisons across wildfire mitigation activities.¹⁷ However, SDG&E recommends clarifying that cost-per-avoided ignition is intended as a supplemental reporting metric and not as a required decision-making criterion for mitigation selection.

SDG&E's mitigation selection framework is grounded in the CPUC's RDF, which prioritizes mitigation activities based on expected risk reduction and cost-effectiveness. Under this framework, mitigation alternatives are evaluated using risk model outputs, mitigation effectiveness, lifecycle costs, and BCR analyses to identify the portfolio of investments that provides the greatest overall risk reduction for customers and communities.

While SDG&E can calculate and report cost-per-avoided ignition as required in Section 8.1.3, cost-per-avoided ignition is not currently a component of SDG&E's RDF-based mitigation selection methodology. Unlike BCR and risk reduction metrics, the cost-per-avoided ignition only measures changes in ignition frequency and does not account for differences in wildfire consequences or overall risk reduction. As a result, cost-per-avoided ignition may provide useful

¹⁶ Section 8.1.3 of Draft Guidelines at p. III-63

¹⁷ Section 8.1.3 of Draft Guidelines at pp. III-65 and III-66

supplemental information, but it does not serve the same decision-making function as the risk reduction and cost-effectiveness metrics already used within the RDF framework.

In addition, SDG&E recommends that Energy Safety clarify several aspects of the proposed methodology to ensure that cost-per-avoided ignition produces meaningful, comparable, and actionable results.

First, the cost-per-avoided ignition metric measures changes in ignition frequency but does not account for differences in ignition consequences. As a result, the metric treats all avoided ignitions as equivalent regardless of their size, severity, location, or resulting wildfire risk. While cost-per-avoided ignition may provide insight into changes in ignition frequency, it does not directly capture differences in overall risk reduction and should therefore be interpreted accordingly.

SDG&E also requests clarification regarding how the cost-per-avoided ignition metric should be applied to mitigation activities whose primary objective is to reduce wildfire consequences rather than prevent ignitions. For example, fuels management activities are intended to reduce fire spread, intensity, and overall wildfire impacts following an ignition event, regardless of ignition source. As a result, these activities may produce significant wildfire risk reduction while having little or no measurable impact on ignition frequency. Under the proposed methodology, such activities could appear to provide limited or no value because the metric is based solely on avoided ignitions. SDG&E recommends that Energy Safety clarify how consequence-reduction activities should be evaluated and reported and clarify that cost-per-avoided ignition is not intended to apply to mitigation activities that do not directly target ignition prevention.

Second, the proposed methodology does not adequately address differences in mitigation lifecycles, benefit periods, and planning horizons. Wildfire mitigation activities vary significantly in terms of cost structure, useful life, and duration of benefits. Many operational mitigation programs consist of recurring inspection, maintenance, and repair activities whose benefits may only persist until the next inspection cycle, while repair and replacement activities may provide benefits for several decades and grid-hardening investments such as Combined Covered Conductor and Strategic Undergrounding may provide benefits for 50 years or longer. The useful life associated with mitigation costs may therefore differ substantially from the period over which ignition reductions are realized.

As currently proposed, the cost-per-avoided ignition methodology appears to calculate costs and avoided ignitions over the full useful life of a mitigation activity. While this approach may be appropriate for long-term grid hardening mitigations, it can create comparability challenges when applied across mitigation strategies with fundamentally different service lives and benefit durations.

Finally, SDG&E recommends clarification regarding implementation and reporting expectations. Many wildfire mitigation activities address multiple ignition-risk drivers simultaneously, and associated costs generally cannot be reasonably or reliably allocated to individual risk drivers. Utilities should therefore be permitted to account for all applicable risk drivers without being required to disaggregate costs or calculate separate cost-per-avoided

ignition values for each driver. In addition, given the diversity of mitigation activities, the scale and complexity of EC systems, and the substantial analytical effort required to estimate baseline ignition rates and mitigation-specific reductions in ignition probability, SDG&E recommends that cost-per-avoided ignition be calculated and reported at the mitigation program level. Program-level reporting provides a more practical, consistent, and transparent basis for comparison while avoiding significant analytical uncertainty and administrative burden.

Accordingly, SDG&E recommends that Energy Safety:

1. Clarify that cost-per-avoided ignition is intended as a supplemental reporting metric and not a required mitigation selection criterion.
2. Clarify that utilities may continue to use established RDF-based risk reduction and cost-effectiveness methodologies as the primary basis for mitigation selection and prioritization.
3. Clarify that cost-per-avoided-ignition applies only to mitigation activities whose primary objective is to reduce wildfire ignition frequency and is not intended to apply to activities that primarily reduce wildfire consequences or impacts after an ignition occurs..
4. Limit cost-per-avoided ignition reporting to long-duration grid-hardening investments, such as Combined Covered Conductor, Strategic Undergrounding, and associated ongoing O&M costs, where lifetime-based comparisons are most meaningful.
5. Allow utilities to clearly identify and disclose the limitations, assumptions, and uncertainties associated with cost-per-avoided ignition calculations.
6. Permit cost-per-avoided ignition to be calculated and reported at the mitigation program level.
7. Allow utilities to account for all relevant ignition-risk drivers without requiring separate cost-per-avoided ignition calculations for each individual risk driver.
8. Permit utilities to align mitigation costs and avoided ignition benefits to a common evaluation horizon, such as the applicable WMP period, and then scale results as appropriate. Aligning costs and benefits over a consistent timeframe would improve comparability across mitigation strategies with substantially different useful lives and provide a more meaningful representation of mitigation effectiveness and affordability.

Without these clarifications, the proposed cost-per-avoided ignition metric may inadvertently create ambiguity regarding its role within established RDF-based mitigation selection frameworks and produce comparisons that are driven more by mitigation lifespan and mathematical scaling effects than by the underlying effectiveness, affordability, and wildfire risk reduction value of the mitigation activity.

D. Energy Safety should explicitly distinguish between metrics that are calculated at the project or circuit segment level and metrics that are reported at the program level in Table 8-5: Risk Impact of Activities

As currently structured, Table 8-5¹⁸ requires reporting of Activity Effectiveness, BCR, Cost-Per-Avoided Ignition, and Expected Risk Reduction at the mitigation activity level. However, these metrics are not typically developed at the same analytical scale. Specifically, SDG&E's existing wildfire risk modeling and BCR framework evaluates cost-effectiveness at the circuit-segment-level, where mitigation alternatives are compared and investment decisions are made. BCRs of mitigation programs are calculated at the circuit-segment-level because results vary across locations, risk profiles, costs, and mitigation alternatives. Accordingly, a program-level BCR may not be representative of the individual investment decisions that support mitigation selection.

Conversely, the proposed cost-per-avoided ignition metric is more appropriately calculated and reported at the mitigation program level. Estimating avoided ignitions at the project- or circuit-segment-level would introduce significant uncertainty and administrative burden, particularly for operational mitigation programs and activities implemented across broad portions of the system. Program-level reporting provides a more meaningful representation of the overall effectiveness and cost of a mitigation strategy while avoiding the appearance of precision that may not be supported by the underlying data.

To avoid ambiguity and improve consistency across EC filings, SDG&E recommends that Energy Safety explicitly distinguish between metrics that are calculated at the project or segment level and metrics that are reported at the program level. Specifically:

- BCR: Utilities should be permitted to report project-, circuit-, or segment-level BCR results, consistent with existing RDF and EC cost-effectiveness frameworks.
- Cost-per-avoided ignition: Utilities should be permitted to calculate and report this metric at the mitigation program level.
- Expected Risk Reduction and Activity Effectiveness: Utilities should be allowed to report program-level summaries derived from their underlying risk assessment methodologies.

This clarification would better align Table 8-5 with existing risk-informed decision-making frameworks and ensure that the reported metrics remain both meaningful and analytically supportable.

E. Projected overall risk reduction needs clarification

In Section 8.2.1, Figure 8-2 is incorrectly referenced as Figure 8-3.¹⁹

¹⁸ Section 8.1.4 of Draft Guidelines at p. III-73

¹⁹ Section 8.2.1 of Draft Guidelines at pp. III-77 and III-78

In addition, SDG&E recommends clarification that Figure 8-2 is illustrative and that utilities may modify the categories displayed on the x-axis, as appropriate, to align with their risk models, mitigation portfolios, and risk-reduction methodologies.

SDG&E proposes the following language: “Figure 8-2 is provided as an illustrative example only. ECs may modify the categories and presentation of the figure as necessary to align with their risk models, mitigation portfolios, and risk-reduction methodologies, provided the figure clearly depicts projected overall EC risk reduction over the WMP period.”

F. Clarification is needed regarding the extent to which interim activities are expected to be evaluated and documented

Section 8.2.3 of the Draft Guidelines requires the evaluation of interim mitigations for “each capital mitigation activity that will require more than one year to implement.”²⁰ However, many interim activities are operational controls or short-term risk management measures that are not typically evaluated in the same manner as long-term capital investments.

In particular, some interim activities are implemented adaptively in response to evolving system conditions, weather forecasts, inspection results, implementation schedules/progress, or emerging risk conditions. For these activities, specific deployment locations, scope, and duration may not be known at the time of WMP preparation, making location-specific cost estimates difficult to develop and potentially reducing the informational value of a detailed Cost Impact Analysis. As a result, requiring the same level of project-specific cost documentation used for permanent mitigation projects may create substantial uncertainty in the reported results.

SDG&E therefore requests clarification that utilities may satisfy the Interim Activities requirements through a programmatic description of the processes used to evaluate, select, implement, prioritize, and assess interim measures, and that qualitative or high-level cost considerations may be used where project-specific location, scope, or deployment information is not yet available. Such clarification would better align the reporting requirements with the practical role of interim measures while still providing Energy Safety with transparency regarding how utilities manage risk during implementation of long-term mitigation projects.

IX. GRID DESIGN & OPERATIONS

G. Update the list of circuits requirement to be limited to larger programs and to be for the full WMP period

Section 9.2 states that each EC must state the impact of each mitigation activity on overall EC risk, “with level of granularity including a list of circuits the activity will be implemented on.”²¹

While an overall list of circuits and high-level activity scope could be generated for some mitigation activities (e.g. combined covered conductor, strategic undergrounding), forecasting

²⁰ Section 8.2.3 of Draft Guidelines at p. III-83

²¹ Section 9.2 of Draft Guidelines at p. III-95

project locations for shorter duration activities, which are typically more widget based than mileage based, is challenging. An example of this is Public Safety Power Shutoff (PSPS) sectionalizing switches, as program scoping is dependent on first setting the scope of larger programs such as combined covered conductor and strategic undergrounding to help prevent unnecessarily installing or replacing equipment in an area that will soon be redone as part of a larger activity.

For activities on which an overall list of circuits are provided, there should be flexibility to shuffle projects from year to year. This would allow for accelerating a project to still meet an activity target if another project within the activity encounters delays.

SDG&E therefore recommends updating the Draft Guidelines to limit the requirement of providing a list of circuits to activities with larger projects and to allow the list to be for the full WMP period, as opposed to requiring it by year. For other activities, a unit target and a general discussion as to how the activity will be executed on circuits could be provided, instead of listing specific project locations.

X. ASSET MANAGEMENT

H. Note 1 and Note 2 in Table 10-2 need to be defined

In Section 10.2, Table 10-2 references Note 1 and Note 2; however, there is no definition for these notes.²² SDG&E recommends these notes be defined as a table note or footnote or be removed from the table.

I. Clarification is needed on what procedures must be included in Asset Inspections and Quality Management System

Table 10-2²³ and Section 10.5.6²⁴ include requirements to provide procedures; however, it is unclear whether utilities are expected to identify only those procedures necessary to understand and implement the activity, or all governing, supporting, and related procedures. Requiring all associated procedures could result in extensive documentation with limited value to the WMP.

SDG&E recommends clarifying that utilities are only required to identify procedures necessary to understand and support the activity being described.

J. Names of the contractor or group that performs asset inspections should not be required

Table 10-2 asks for contractor specificity, which potentially results in confidentiality issues and mid-cycle changes. SDG&E recommends that the guidelines be changed to specify if an activity is performed by an internal or external (contractor) group.

²² Section 10.2 of Draft Guidelines at p. III-123

²³ Section 10.2 of Draft Guidelines at p. III-123

²⁴ Section 10.5.6 of Draft Guidelines at p. III-136

K. There should be distinct frequency/trigger reporting requirements for routine and non-routine, event-driven inspections

In Section 10.2, frequency and trigger reporting requirements appear to apply the same reporting framework to both routine inspection programs and non-routine, event-driven inspection activities.²⁵ This creates a practical challenge because event-driven inspections are initiated by unpredictable circumstances, such as faults, ignitions, storms, or other triggering events, and therefore cannot be forecasted in advance. As a result, utilities cannot reasonably provide predefined inspection frequencies, inspection volumes, geographic coverage, or other reporting elements that assume a predictable scope of work. Additionally, excluding these inspections from reporting could create the inaccurate impression that such inspections are not being performed.

SDG&E recommends distinguishing between routine inspection programs and non-routine event-driven inspection activities. For routine inspections, frequency-based reporting remains appropriate. For non-routine inspections, utilities should be allowed to describe the triggering criteria and response expectations rather than be required to provide fixed frequencies, coverage metrics, or other reporting elements that cannot be reasonably established in advance. This would improve the practicality of the reporting requirements while preserving transparency regarding how utilities monitor and respond to emerging wildfire risks.

L. Clarification is needed on required reporting for open work orders

Section 10.3 appears to require reporting on all asset management open work orders, regardless of how they were generated.²⁶ Because utilities create work orders through a variety of operational, maintenance, construction, and customer service processes, including all open work orders would not provide a meaningful measure of inspection program performance or corrective action effectiveness. It could also create inconsistent results across utilities and introduce significant administrative burden to identify and maintain work order data from multiple systems and business processes.

SDG&E recommends limiting required reporting to work orders generated as a result of inspection programs included in Section 10. Alternatively, Energy Safety should clearly distinguish between inspection-generated corrective action work orders and work orders created through other EC processes, with reporting requirements focused on those work orders intended to remediate identified asset conditions. This would provide more meaningful and comparable information regarding asset condition management and inspection program effectiveness while reducing unnecessary reporting complexity and administrative burden.

²⁵ Section 10.2 of Draft Guidelines at p. III-121

²⁶ Section 10.3 of Draft Guidelines at p. III-126

M. The requirement to describe how ignitions associated with open work orders affect condition prioritization should be modified

The requirement to describe “how ignitions associated with open work orders inform the priority level the EC assigns to conditions”²⁷ may not be practical because utilities often cannot determine whether an ignition was directly associated with an open work order. Establishing such a relationship typically requires detailed investigation and may not be supported by available evidence.

SDG&E recommends revising the requirement to focus on how utilities incorporate lessons learned from ignition investigations into their condition prioritization and corrective action frameworks, rather than requiring a determination of whether ignitions were associated with open work orders. This approach would provide more meaningful insight into how ignition-related findings influence risk management decisions while avoiding causal determinations that may not be supported by available evidence.

N. Equipment failure and ignition trends should be revised to focus on high-level strategies

For equipment maintenance and repair, the required discussion on equipment failure and ignition trends²⁸ appears overly prescriptive and would create a significant reporting burden without providing commensurate value. The requested level of detail would require utilities to document equipment-specific maintenance strategies, condition assessment methods, failure mechanisms, and remediation practices across numerous asset types. Much of this information is already maintained in technical standards, procedures, and asset management documentation and is more detailed than is appropriate for a high-level planning document such as the WMP.

SDG&E recommends the requirements for equipment failure and ignition trends be revised to focus on high-level descriptions of maintenance and replacement strategies and how those strategies support wildfire risk reduction, rather than requiring detailed descriptions for every equipment type and failure mechanism. Utilities should be permitted to reference existing standards, procedures, and asset management programs for equipment-specific details. This approach would provide transparency regarding wildfire risk mitigation practices while avoiding the need to effectively recreate large portions of an EC’s engineering and construction standards within the WMP.

O. The section references in Table 10-6 should be corrected

The instructions for the first column of Table 10-6 “Activity Subject to QC Inspection” reference Sections 9.2 through 9.4.²⁹ However, those sections are part of Grid Design and

²⁷ Section 10.3 of Draft Guidelines at p. III-127

²⁸ Section 10.4 of Draft Guidelines at p. III-130

²⁹ Section 10.5.1 of Draft Guidelines at p. III-132 and III-134

Operations. SDG&E recommends updating the sections to reference the appropriate sections in Asset Management.

P. Instructions for reporting the number of internal and contracted FTEs in Table 10-7 should be revised

Table 10-7 requires ECs to provide the number of qualified internal and contracted full-time equivalent (FTEs) for various roles.³⁰ However, staffing levels fluctuate and can vary by activity. In addition, ECs may not have complete visibility into contractor staffing plans, as contractors are responsible for allocating resources to fulfill established scopes of work including using sub-contractors. Additionally, not all contracts are time and materials and therefore, may not be invoiced at that level of detail.

Mandating reporting at the contractor FTE level would require a significant amount of manual labor and resources. Contractors do not use a standard invoice template and thus each invoice is unique. SDG&E does not currently have a system to track invoice hours. The wildfire area processes thousands of invoices each year that would all need to be manually tracked.

Q. SDG&E recommends revising the instructions for Table 10-7 to allow ECs to report only the number of qualified internal FTEs as of a specified reporting date. Sections 10.6.1 and 11.11.1 should be revised to discuss staffing and competency at a high level

Workforce planning is a continuous and adaptive process that responds to changing operational priorities, regulatory requirements, workload forecasts, workforce availability, and emerging risks, and is managed through ongoing business operations. The level of detail requested in Sections 10.6.1³¹ and 11.11.1³² would create a significant reporting burden while providing limited additional insight into wildfire mitigation activities.

SDG&E recommends Sections 10.6.1 and 11.11.1 be revised to require only a high-level description of how utilities assess and maintain workforce capacity to support WMP initiatives during the WMP period. Workforce projections should be recognized as forward-looking planning assumptions, not binding staffing commitments, and utilities should retain the flexibility to adjust resource allocations as needed to support WMP activities.

R. Tracking IDs for QA and QC activities should not be modified

Section 9.4.1 and 11.10.1 state that Tracking IDs for QA and QC activities must be an ‘extension’ of the original activity.³³ This would require SDG&E to change Tracking ID

³⁰ Section 10.6 of Draft Guidelines at pp. III-137 to III-139

³¹ Section 10.6.1 of Draft Guidelines at p. III-140

³² Section 11.11.1 of Draft Guidelines at p. III-176

³³ Section 9.4.1 of Draft Guidelines at p. III-106; Section 11.10.1 of Draft Guidelines at p. III-167

numbers, which would result in new Tracking IDs that do not match historical Tracking IDs, leading to data governance challenges.

SDG&E recommends utilities be allowed to continue to use the same Tracking IDs as have been used in the past and not require an ‘extension’ of the original activity. This will support clearer data governance and facilitate more timely and accurate data reporting.

S. Clarification is needed for Table 14-4

Table 14-4 has a column named “# of Unplanned Level 1 conditions on structures with open work order.”³⁴ SDG&E requests that Energy Safety clarify if this column is intended to capture unplanned risk events resulting from worsening open level 2 or 3 conditions, or level 1 conditions resulting from worsening open level 2 or 3 conditions. The use of “unplanned” in this context is confusing as conditions are never planned.

XI. COMMUNITY OUTREACH & PUBLIC AWARENESS

A. The requirement to communicate in the “top three primary languages used in California” should be revised

Section 12.2.4 requires multilingual capabilities for customer communication, including “top three primary languages used in California.”³⁵ However, this requirement could result in communications in languages that are not prevalent within an EC’s service territory and could exclude languages that are commonly spoken in the EC’s service territory. Such an approach would be inconsistent with the Commission’s existing PSPS communication requirements, which are designed to ensure that critical safety communications are targeted to the populations most likely to be affected.

SDG&E recommends revising this language to align with the Commission’s existing PSPS communication framework and basing customer notification language requirements on service-territory demographics to better ensure that emergency communications reach Limited English Proficient customers who are located within the potentially affected area and to avoid creating conflicting language standards across Commission proceedings.

Accordingly, SDG&E recommends revising the requirement as follows:

“Multilingual communication capabilities, including notifications in the prevalent languages spoken within the EC’s service territory, consistent with applicable Commission decisions and PSPS communication requirements.”

³⁴ Section 14.4.4 of Draft Guidelines at p. III-226

³⁵ Section 12.2.4 of Draft Guidelines at p. III-182

XII. ENTERPRISE SYSTEMS

B. Clarification is needed regarding enterprise system architecture section

The Draft Guidelines require ECs to “describe the architecture of its enterprise systems supporting wildfire mitigation, including: A diagram or flowchart that illustrates how key enterprise systems and databases are interconnected and the end-to-end data flow from data sources through these systems.”³⁶

SDG&E recommends the logical enterprise architecture be limited to business applications, databases, data sources, integrations, and data flows supporting wildfire mitigation activities and not the physical infrastructure architecture, such as servers, network configurations, cloud environments, storage architecture, and other underlying technology components.

XIII. WMP FORMATTING, ADA COMPLIANCE

A. The naming convention for Section 14 should be changed to standalone Appendices A, B, C, D, E, F.

Putting the appendices under a “Section 14” will create significant formatting difficulties, as some of these appendices are standalone documents that are required to have their own table of contents and will also have their own attachments. Continuing sequential page numbering for a Section 14 that has distinct attachments will also be very difficult and will most likely need to be done manually. For example, Appendix A (Areas for Continuing Improvement) will have distinct attachments (*i.e.* joint IOU reports) and Appendix C (supporting documents) will have distinct attachments and must include a table of contents.

SDG&E recommends creating all appendices using the caption “appendices” feature, naming each appendix A, B, C, etc., and attaching each appendix as a distinct attachment with its own linked Table of Contents and page numbering. Adopting this structure will avoid formatting difficulties for the WMP report publishing.

B. Some tables need to be formatted for ADA compliance

Several tables throughout the Draft Guidelines (*e.g.* Table 9-2, Table 9-3, Table 10-3, and 10-4) have merged cells, which is not Americans with Disabilities Act (ADA) compliant.³⁷

SDG&E recommends restructuring tables to remove merged cells so assistive technologies, such as screen readers, can navigate them logically.

³⁶ Section 13.3 of Draft Guidelines at p. III-187

³⁷ General Services Administration, *Microsoft Word 365 Basic Authoring and Testing Guide*, pp. 13 and 14, available at: <https://www.section508.gov/~assets/files/ms-word-365-basic-authoring-and-testing-guide.pdf>

C. Broken links referenced as ‘Section 0’ should be corrected

Sections 10.1.1: Quantitative Targets, 10.5.1: Overview, and 10.5.5: QA and QC Exclusions have a broken link, ‘Section 0’, which needs to be corrected for proper referencing.

XIV. LESSONS LEARNED

D. The requirement to include lessons learned for incident investigations should be limited to the prior five years

The “Catastrophic Wildfires” lessons learned section of the draft guidelines explicitly states that the timeframe is “within 20 years,” however, a timeframe is missing from the “Incident Investigations” sub-section.³⁸

SDG&E recommends that any lessons learned related to incident investigations be limited to the previous five years (*e.g.*, if the WMP is submitted in 2027, this would encompass 2022 through 2026). Limiting the lessons learned for incident investigations from the prior five years would provide clarity and consistency for the electrical corporations. In addition, any lessons learned from more than five years ago may no longer be relevant to current operations, an issue that will be more likely the further back in time you go.

XV. CONCLUSION

SDG&E respectfully requests that Energy Safety take these recommendations into consideration as the final guidelines are developed.

Respectfully submitted,

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³⁸ Sections 5.1 and 5.2 of Draft Guidelines at pp. III-8 and III-9