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VIA E-MAIL

Timothy Tutt
Advisor, Wildfire Safety Advisory Board
715 P Street, 20th Floor
Sacramento, CA 95814

RE: SDG&E Comments on Wildfire Safety Advisory Board Draft Recommendations to the Office of Energy Infrastructure Safety on Additional Wildfire Mitigation Plan Requirements and Performance Metrics

Dear Mr. Tutt:

SDG&E hereby provides comments regarding the Wildfire Safety Advisory Board's (WSAB) draft recommendations to the Office of Energy Infrastructure Safety (Energy Safety) on Additional Wildfire Mitigation Plan Requirements and Performance Metrics (Recommendations), provided April 18, 2022. At the outset, SDG&E welcomes Energy Safety's efforts to begin a dialogue regarding the development of the 2023 Wildfire Mitigation Plan (WMP) Guidelines (2023 Guidelines) early in the year and looks forward to participating in the process to develop final guidelines. SDG&E also appreciates the WSAB's recognition of its wildfire safety efforts, in particular the observation that "SDG&E continues to set the bar on customer outreach."¹ SDG&E takes pride in its WMP initiatives and its established history as a leader in wildfire mitigation and emergency preparedness efforts.

SDG&E's comments note limited points of concern with the WSAB recommendations as well as some areas of agreement.

I. NOTICES OF VIOLATION ARE OUTSIDE THE SCOPE OF THE WILDFIRE MITIGATION PLANS

The Board suggests that the 2023 Wildfire Mitigation Plan (WMP or Plan) Guidelines include "tracking over time of the number of notices of violation on their systems" with additional detail regarding the violations.² The Board also suggests that utilities track violations

¹ Recommendations at 26.

² Recommendations at 16.

within the high fire threat districts (HFTD) to provide intelligence about the utility's prioritization of system inspection and maintenance, and include in their WMPs a short description of any violations found categorized as "severe."³

Energy Safety has previously declined to require information regarding Notices of Violation in the WMPs and should continue to do so in future guidelines. The Public Utilities Code recognizes the distinct process that address approval of the WMP—which is achieved through the electrical corporations' annual WMP submissions and updates—and compliance with the WMP. Public Utilities Code Section 8386 establishes the various requirements of the WMPs; if a utility files a plan in compliance with those requirements, Energy Safety should approve the Plan. Plan compliance is addressed through a separate process "following approval of [Plan]," and the California Public Utilities Commission (Commission) maintains authority to penalize the electrical corporations for instances of "substantial noncompliance with the plan."⁵ The utilities also report on Plan compliance through their quarterly submissions.

Energy Safety has established a transparent public process by which all stakeholders may review Notices of Violation or Defect, and in instances where an electrical corporation requests a hearing to contest the allegations, that process allows for stakeholder comment.⁶ The WMPs should not be a forum for stakeholders to review instances of potential violations and potentially second guess or re-litigate violations or defects that have already been resolved through the process established by Energy Safety. For these reasons, Energy Safety should continue to oversee WMP compliance through a separate process distinct from review and approval of the WMPs.

II. THE BOARD SHOULD NOT ENCOURAGE ADDITIONAL RISK MODELING WORKSHOPS WHICH RESULT IN REDUNDANCY AND RESOURCE STRAIN

In its recommendations, the Board suggests that Energy Safety "build upon the existing risk modeling working group meetings to hold public workshops and/or create a wildfire modeling expert review panel [including academic research] to review possible biases in risk modeling."⁸ Collaboration between the electrical corporations, stakeholders, and Energy Safety is valuable, but the addition of workshops to the existing risk modeling working group continues to require the dedication of electrical corporation resources and can divert attention from the work of implementing wildfire mitigation efforts. Energy Safety should continue to consider the availability of resources, as well as the need to balance promoting ongoing transparency and collaboration with the important work that the utilities are performing to reduce wildfire risk.

Given the level of stakeholder engagement that is already present in the risk modeling working group meetings, Energy Safety has fostered a collaborative environment where the utilities, experts, and other parties may build upon existing risk modeling efforts. Additionally,

³ Recommendations at 15.

⁵ Pub. Util. Code §8386.3(c); Pub. Util. Code § 8386.1.

⁶ See Ca. Gov. Code §15475.4(b).

⁸ Recommendations at 15.

creation of an expert review panel for modeling approaches is unnecessary and may reduce the likelihood of utility innovation and efforts to develop optimal modeling approaches for each respective (and distinct) service territory. SDG&E seeks peer review and the inclusion of academic efforts to improve its risk models so that it may efficiently reduce wildfire and PSPS risk. Standardized oversight of models, however, may have the perverse effect of decreasing innovation as modeling science and data inputs improve.

SDG&E continually strives to improve its risk modeling with respect to wildfire mitigation efforts and looks forward to additional engagement with the risk modeling working group to build upon those efforts. Additional workshops or oversight, however, may be redundant or unnecessary.

III. SDG&E SUPPORTS EFFORTS REGARDING ENVIRONMENTAL STEWARDSHIP IN VEGETATION MANAGEMENT

Vegetation management is a critical aspect of wildfire mitigation. To preserve the integrity and safety of its electrical system, SDG&E must address the risk of vegetation-line contact and reduce that threat to the extent necessary and possible. But as the WSAB notes, vegetation management practices have a significant impact on local ecosystems and poses concerns regarding environmental stewardship. SDG&E takes pride in its efforts to balance vegetation management for risk mitigation with sustainability. To promote further sustainability efforts and reduce the environmental impacts of tree trimming and removals, SDG&E introduced its vegetation restoration initiative in its 2022 WMP Update. This initiative builds upon SDG&E's existing "Right Tree Right Place" program, which offers customers replacement trees that are compatible with the local environment and utility infrastructure. Through the vegetation restoration initiative, SDG&E will distribute and/or plant a targeted 10,000 trees in its service territory to combat climate change, enhance ecological equity, and promote sustainability.

Conclusion

SDG&E appreciates the WSAB's review and consideration of these comments, and requests that the Board take them into account in the final recommendations regarding the 2023 WMPs.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company