



Laura M. Fulton
Senior Counsel
8330 Century Park Court, CP32F
San Diego, CA 92123-1548
LFulton@SDGE.com

December 21, 2022

VIA E-MAIL

Caroline Thomas Jacobs
Director, Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: San Diego Gas & Electric's (SDG&E) Notification of Completion of Substantial Vegetation Management in accordance with California Public Utilities Code Section 8386.3.(c)(5)(A)

Dear Director Thomas Jacobs:

In accordance with California Public Utilities Code Section 8386.3(c)(5)(A), SDG&E is providing notification to the Office of Energy Infrastructure Safety that San Diego Gas & Electric (SDG&E) has completed a substantial portion of its 2022 Wildfire Mitigation Plan (WMP) vegetation management initiatives. SDG&E provides the following activities to represent its completion of a substantial portion of its 2022 WMP Vegetation Management Initiatives.

SDG&E's Detailed Inspections activity (SDG&E WMP 7.3.5.2) is the annual inspection of all inventory trees within the service territory. SDG&E's 2022 target for this initiative is 491,822 trees, and thus far, SDG&E has completed inspections on approximately 489,174 trees. SDG&E expects to reach, or exceed, the target by year's end since the inventory tree population fluctuates daily and changes over time as a result of trees removed in the landscape and added to the inventory.

SDG&E's Fuels Management Program (SDG&E WMP initiative 7.3.5.5) consists of the thinning of vegetative fuels around structures subject to pole brushing within a radius greater than required by law in the high fire threat areas. SDG&E's 2022 target for this initiative is 500 poles, and thus far, SDG&E has completed 454 poles and expects to reach the 2022 target by year's end.

SDG&E's Enhanced Trim/Removals activity (SDG&E WMP initiative 7.3.5.9) includes the application of enhanced time-of-trim clearances on targeted species and the removal of trees located within the HFTD. SDG&E's 2022 target for this initiative is 12,500 trees and, thus far,

SDG&E has completed 10,501 units under this initiative. Enhanced clearances are not arbitrary or predetermined, and not performed on all targeted tree species. Rather, those trees that cannot be maintained with routine clearance, and/or present a potential threat to the conductors by branch-break are candidates for enhanced clearance. The determination and application of enhanced clearances is made during the tree trimming activity. The pre-inspection activity does prescribe post-trim clearance, however the determination of whether a tree requires removal or substantial crown reduction due to growth rate or defect is made by the pre-inspector.

There is a high degree of variability in forecasting the number of trees that may require enhanced trimming, including but not limited to: species, precipitation, tree growth, location of defect, pruning frequency, regional tree mortality, etc. The methodology to derive the target for this initiative was modified in 2022 using tree inventory trim frequency data, and historical averages. However, since SDG&E only formally began its enhanced trim/removal initiative in 2019, the data is still somewhat limited for forecasting using a trend analysis with a high degree of confidence. Using current trends, it is likely a more accurate forecast number of trees that will require enhanced clearance annually is 10,000-11,000. SDG&E will continue to review its methodology to derive an appropriate, annual target for this initiative.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company