



June 20, 2024

Brian D’Agostino
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Subject: Notice on Errata and Supplemental Reportable Updates for San Diego Gas & Electric Company 2025 Wildfire Mitigation Plan Update

Mr. D’Agostino:

San Diego Gas & Electric Company (SDG&E) submitted its 2025 Wildfire Mitigation Plan Update (2025 WMP Update) and revised 2023-2025 Base Wildfire Mitigation Plan (Revised Base WMP) (redlined and clean versions) to the Office of Energy Infrastructure Safety’s (Energy Safety) 2023-2025 WMP docket on April 2, 2024. SDG&E submitted an update to these documents incorporating errata identified by SDG&E to the same docket on May 14, 2024.¹

Request for Errata

Energy Safety reviewed SDG&E’s submissions and identified additional non-substantive errors for SDG&E to correct, listed in Appendix A.

Supplemental Reportable Updates

SDG&E submitted a Change Order Request for its WMP to Energy Safety’s 2023-2025 WMP docket on November 1, 2023.² Energy Safety issued a decision on SDG&E’s Change Order

¹ SDG&E 2025 WMP Update Non-Substantive Errata ([cover letter](#), [errata](#), [revised Update](#), [revised Base WMP redlined](#), [revised Base WMP clean](#))

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56679&shareable=true>;
<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56680&shareable=true>;
<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56681&shareable=true>;
<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56684&shareable=true>;
<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56683&shareable=true>, accessed June 17, 2024)

² [SDG&E 2023 Change Order Report \(Nov. 1, 2023\)](#) and [Attachment A](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55887&shareable=true>;
<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55888&shareable=true>, both accessed May 29,

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Request approving 1 of SDG&E's requests to change its 2024 targets and rejecting 8 of its requests.³

To account for effects from the Change Order Decision being issued after SDG&E's 2025 WMP Update submission, SDG&E may submit supplemental reportable updates for 2025 for the following:

- WMP.455: Covered Conductor
- WMP.481: Distribution Infrared Inspections
- WMP.449: Wireless Fault Indicators
- WMP.549: Distribution Communications Reliability Improvements
- WMP.970: Air Quality Index
- WMP.468: Standby Power Program (Fixed Backup Power)
- WMP.462: Microgrids
- WMP.447: Weather Station Maintenance and Calibration

SDG&E must provide a list of all supplemental reportable updates in a cover letter, describe the supplemental reportable updates in its newly revised 2025 WMP Update, and show the supplemental reportable updates in redline in its Revised Base WMP. Any reportable updates must comply with the 2025 WMP Update Guidelines.⁴ Energy Safety will separately issue a schedule for public comment on the submission.

SDG&E must revise its 2025 WMP Update and Revised Base WMP (both redlined and clean versions) to correct the non-substantive errors identified in Appendix A and to include supplemental reportable updates, as described above, and submit its newly revised 2025 WMP Update and Revised Base WMP to Energy Safety's 2023-2025 WMP docket by July 5, 2024.

SDG&E must also include in these versions of the 2025 WMP Update and Revised Base WMP the target change approved in Energy Safety's Decision on SDG&E's Change Order Request.

SDG&E must not make any changes to its WMP beyond corrections to the errors listed in Appendix A, the supplemental reportable updates to the initiative targets listed above, and the target change approved in Energy Safety's Decision on SDG&E's Change Order Request.

2024); [SDG&E 2023 Change Order Report \(Dec. 19, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56078&shareable=true) and [Attachment A](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56079&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56078&shareable=true; https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56079&shareable=true, both accessed May 29, 2024).

³ [Decision on San Diego Gas & Electric Company's Change Order Request in relation to its 2023-2025 Base Wildfire Mitigation Plan \(May 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56751&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56751&shareable=true, accessed June 3, 2024).

⁴ [Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines \(adopted Jan. 2024, published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed June 14, 2024).

Notice on Errata and Supplemental Reportable Updates for SDG&E 2025 WMP Update

Sincerely,

A handwritten signature in black ink, appearing to read 'Suzie', with a stylized flourish at the end.

Suzie Rose
Program Manager, Electrical Safety Policy Division
Office of Energy Infrastructure Safety

APPENDIX A

Table 1. Non-Substantive Errors in SDG&E 2025 WMP Update Submitted May 14, 2024⁵

Section	Document page number/ PDF page number	Correction or Clarification
2.2 Targets and Expenditures	p. 22/30 Revised 2025 WMP Update ⁶ p. 3/3 Revised 2025 WMP Update, cover letter	The letter SDG&E provided summarizing non-substantive errata to its 2025 WMP Update states that WMP.442 is not reportable, and that SDG&E deleted WMP.442 from Table 7 in its 2025 WMP Update. However, in the revised version of SDG&E’s 2025 WMP Update provided with this submission, Table 7 still shows initiative WMP.442. SDG&E stated in a data request response that the O&M expenditures change is -14 percent, as reported in Table 7 of its 2025 WMP Update. ⁷ This update therefore does not meet the criteria for reportability. ⁸ SDG&E must delete WMP.442 from Table 7 of its 2025 WMP Update.
2.2.1.11 Distribution Overhead System Hardening 2.2.1.11.3 Change	p. 28/36 Revised 2025 WMP Update	In its Revised 2025 WMP Update, “The 2025 projected O&M expenditures for Distribution Overhead System Hardening were increased due historical O&M cost trend indicators” should be “due to historical O&M cost trend indicators.”

⁵ The version of the 2025 WMP Update referenced in this table is the one submitted May 14, 2024: [2025 Wildfire Mitigation Plan Update San Diego Gas & Electric May 14, 2024 \(Revision 1\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56680&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56680&shareable=true, accessed May 20, 2024).

⁶ All references to “Revised 2025 WMP Update” are to SDG&E’s errata versions of its 2025 Update filings of May 14, 2024.

⁷ “The correct change in O&M expenditures for Risk Assessment and Mapping (WMP.442) is -14%...” per Data Request [OEIS-P-WMP-2024- SDGE-04](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56749&shareable=true), Question 2, p. 4 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56749&shareable=true, accessed May 31, 2024).

⁸ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), “Reportable Updates,” p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid= 56254&shareable=true, accessed June 3, 2024).

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Section	Document page number/ PDF page number	Correction or Clarification
Justification (WMP.475)		SDG&E must add the word “to” after the word “due” in the sentence: “The 2025 projected O&M expenditures for Distribution Overhead System Hardening were increased due historical O&M cost trend indicators.”
Section 3 Quarterly Inspection Targets for 2025	pp. 40-41/48-49 Revised 2025 WMP Update	<p>SDG&E must remove non-reportable 2025 quarterly inspection targets from Table 8: Asset Inspections and Vegetation Management Targets of its Revised 2025 WMP Update for the following initiatives:</p> <ul style="list-style-type: none"> • WMP.497: Vegetation Management Fuels management • WMP.512: Vegetation Management Pole Clearing (Brushing) • WMP.501: Vegetation Management Clearance • WMP.505: Vegetation Management QA/QC Vegetation Management <p>Only targets from Tables 8-4 and 8-15 of its approved 2023-2025 Base WMP are reportable in the 2025 WMP Update.⁹ SDG&E must remove non-reportable initiatives from Table 8 of its Revised 2025 WMP Update.</p> <p>Additionally, SDG&E’s Revised 2025 WMP Update changed the following 2025 targets in Table 8: Asset Inspections and Vegetation Management Targets:</p> <ul style="list-style-type: none"> • Distribution Wood Pole Intrusive Inspections (WMP.483) <ul style="list-style-type: none"> ○ Target End of Q3 2025 & Unit: changed from 344 to 0 ○ End of Year Target 2025 & Unit: changed from 344 to 0 ○ % Risk Impact 2025: changed from 0.03% to 0.00% • Transmission Wood Pole Intrusive Inspections (WMP.1190)

⁹ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), “Reportable Updates,” p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid= 56254&shareable=true, accessed May 6, 2024).

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Section	Document page number/ PDF page number	Correction or Clarification
		<ul style="list-style-type: none"> ○ End of Year Target 2025 & Unit: changed from 114 to 141 ● Transmission Overhead Patrol Inspections (WMP.489) <ul style="list-style-type: none"> ○ Target End of Q2 2025 & Unit: changed from 3,766 to 6,008 ○ Target End of Q3 2025 & Unit: changed from 5,650 to 6,337 ○ End of Year Target 2025 & Unit: changed from 7,533 to 6,337 <p>The above 2025 target changes are substantive changes that cannot be made via a non-substantive errata submission.</p> <p>SDG&E must revert the above targets back to values provided in Table 8 of its 2025 WMP Update filed on April 2, 2024.¹⁰</p>
Appendix B	PDF pp. 255 & 256 Revised 2025 WMP Update	<p>Under “Notes” column: “Calbration performed 1/24” should be “Calibration performed 1/24.”</p> <p>SDG&E must change “Calbration” to “Calibration” in both instances in Appendix B.</p>

¹⁰ [SDG&E 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56412&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56412&shareable=true, accessed June 7, 2024)

Table 2A. Non-Substantive Individual Errors in SDG&E Revised Base WMP (Redlined and Clean Versions) Submitted May 14, 2024:¹¹

Section	Document page number/ PDF page number	Correction or Clarification
<p>6.4.2 Top Risk-Contributing Circuits/Segments/Spans</p>	<p>p. 85/115 Revised Base WMP redlined</p> <p>p. 84/114 Revised Base WMP clean</p> <p>p. 6/14 Revised 2025 WMP Update</p>	<p>In its Revised Base WMP, “OEIS Table 6-5 Summary of Top-Risk Circuits, Segments, or Spans” the changes to ranking shown in the 2025 WMP Update are not reflected in the Revised Base WMP (redlined and clean). Comparing Table 6-5 to Table 1 in the 2025 WMP Update, “Top 5% Wildfire Risk Circuits/Segments/Spans,” ranks 17-20, the following segment IDs are different:</p> <ul style="list-style-type: none"> • Approved Base WMP & Revised Base WMP (redlined and clean): <ul style="list-style-type: none"> ○ 17 Segment ID: 220-298R ○ 18 Segment ID: 237-17R ○ 19 Segment ID: 448-47R ○ 20 Segment ID: 217-837R • 2025 WMP Update (p. 6): <ul style="list-style-type: none"> ○ 17 Segment ID: 237-17R ○ 18 Segment ID: 220-298R ○ 19 Segment ID: 217-837R ○ 20 Segment ID: 73-683R <p>SDG&E must include in its Revised Base WMP (redlined and clean) both the original top 5 percent risk circuit table “OEIS Table 6-5 Summary of Top-Risk Circuits, Segments, or Spans” from its approved Base WMP and an</p>

¹¹ The version of the 2023-2025 WMP referenced in this table is the one submitted May 14, 2024: [2023-2025 Wildfire Mitigation Plan San Diego Gas & Electric, October 23, 2023 \[Redline Non-Substantive Errata Version May 14, 2024\]](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56684&shareable=true) (Redacted version) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56684&shareable=true>, accessed May 20, 2024).

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Section	Document page number/ PDF page number	Correction or Clarification
		<p>updated table showing the top 5 percent risk circuit tables titled “OEIS Table 6-5.B Summary of Top-Risk Circuits, Segments, or Spans – Updated” showing the updated segment ranking provided in SDG&E’s 2025 WMP Update (p. 6). In the redlined version, Table 6-5.B must be shown as a tracked addition. OEIS Table 6-5 must be included unchanged from SDG&E’s approved Base WMP.</p>
<p>8.1.1.1 Objectives</p>	<p>p. 141/171 Revised Base WMP redlined</p>	<p>In “OEIS Table 8-1 Grid Design, Operations, and Maintenance Objectives (3-year plan)” of SDG&E’s Revised Base WMP redlined version, for Objective number 8.1.29 under “Applicable Initiative(s), Tracking ID(s),” there are numerous struck-out words in black instead of red.</p> <p>SDG&E must show all changes from the approved Base WMP redlined in “OEIS Table 8-1 Grid Design, Operations, and Maintenance Objectives (3-year plan)” in its Revised Base WMP redlined version.</p>
<p>8.1.1.2 Targets</p>	<p>p. 147-148/ 177-178 Revised Base WMP redlined</p> <p>p. 146-147/ 176-177 Revised Base WMP clean</p> <p>p. 143-144/ 173-174</p>	<p>In “OEIS Table 8-3 Grid Design, Operations, and Maintenance Targets by Year” of SDG&E’s approved Base WMP, the initiative activity Lightning Arresters (WMP.550) has unit “Las” under 2023 Target & Unit, 2024 Target & Unit, and 2025 Target & Unit. In the Revised Base WMP redlined version, the unit is changed to “Arrestors.” In the first two columns of OEIS Table 8-3, the changed unit is not redlined. In the third column (2025 Target & Unit) “Arrestors” is in red, but the original unit is not redlined with strikethrough.</p> <p>SDG&E must show every change from the approved Base WMP redlined (i.e., original in red with strikethrough and update entry in red) in OEIS Table 8-3 Grid Design, Operations, and Maintenance Targets by Year.</p>

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Section	Document page number/ PDF page number	Correction or Clarification
	Approved Base WMP	<p>Additionally, in the approved Base WMP, OEIS Table 8-3, under 2024 Target & Unit, the target for Microgrids (WMP.462) was 4 microgrids. The Revised Base WMP redlined version was changed to 3 microgrids and not redlined. The 2024 targets cannot be changed in the Revised Base WMP.</p> <p>SDG&E must revert the 2024 target for Microgrids (WMP.462) to the approved target of 4 microgrids.</p>
8.1.1.2 Targets	<p>pp. 149-150/ 179-180 Revised Base WMP redlined</p> <p>p. 20/28 Revised 2025 WMP Update</p>	<p>Updated targets for 2025 must be redlined in the Revised Base WMP redlined version. For the initiatives below, SDG&E changed targets in Table 6 of its 2025 WMP Update,¹² however these changes are not reflected in OEIS Table 8-4 of SDG&E’s Revised Base WMP.¹³</p> <ul style="list-style-type: none"> • Transmission Overhead Detailed Inspections (WMP.479) <ul style="list-style-type: none"> ○ Revised WMP end of 2025 target: “1,979” (p. 149) ○ 2025 WMP Update end of 2025 target (new): “2479” (p. 20) • Distribution Infrared Inspections (WMP.481) <ul style="list-style-type: none"> ○ Revised WMP end of 2025 target: “9,532” (p. 149) ○ 2025 WMP Update end of 2025 target (new): “300” (p. 20) • Transmission Infrared Inspections (WMP.482) <ul style="list-style-type: none"> ○ Revised WMP end of 2025 target: “6,179” (p. 149) ○ 2025 WMP Update end of 2025 target (new): “7331” (p. 20)

¹² SDG&E’s 2025 WMP Update (May 14, 2024), Table 6 “Qualifying Changes in Targets and Expenditures (in Thousands),” pp. 20-21.

¹³ [2023-2025 Wildfire Mitigation Plan San Diego Gas & Electric, October 23, 2023 \[Redline Non-Substantive Errata Version May 14, 2024\]](#) (Redacted version), OEIS Table 8-4 “Asset Inspections Targets by Year,” pp. 149-150 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56684&shareable=true>, accessed May 20, 2024).

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Section	Document page number/ PDF page number	Correction or Clarification
		<ul style="list-style-type: none"> • Distribution Wood Pole Intrusive Inspections (WMP.483) <ul style="list-style-type: none"> ○ Revised WMP end of 2025 target: “0” (p. 149) ○ 2025 WMP Update end of 2025 target (new): “344” (p. 20) • Transmission Overhead Patrol Inspections (WMP.489) <ul style="list-style-type: none"> ○ Revised WMP end of 2025 target: “6,337” (p. 150) ○ 2025 WMP Update end of 2025 target (new): “7533” (p. 20) • Transmission Wood Pole Intrusive Inspections (WMP.1190) <ul style="list-style-type: none"> ○ Revised WMP end of 2025 target: “141” (p. 149) ○ 2025 WMP Update end of 2025 target (new): “114” (p. 21) <p>In OEIS Table 8-4 of its Revised Base WMP redlined version, SDG&E must provide updated 2025 targets properly redlined.</p>
<p>8.1.1.2 Targets</p>	<p>pp. 149-150/ 179-180 Revised Base WMP redlined</p> <p>pp. 147-148/ 177-178 Revised Base WMP clean</p>	<p>In its Revised Base WMP redlined version, under “OEIS Table 8-4 Asset Inspections Targets by Year,” there is a note redlined next to a single asterisk “*Values are subject to change pending OEIS approval of the 2023 change order.” There is no redlined asterisk in the table, so it appears that this asterisk pertains to the seven non-redlined asterisks in the header row next to the word “unit.” The asterisk also appears in the Revised Base WMP clean version.</p> <p>In SDG&E’s April 2, 2024, submission of its Revised Base WMP, there was a red asterisk next to the End of Year Target 2024 (9,532) for Distribution Infrared Inspections (WMP.481).</p> <p>SDG&E must correct the reference to its Change Order Request. SDG&E must clarify its use of asterisks with notes in OEIS Table 8-4.</p>

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Section	Document page number/ PDF page number	Correction or Clarification
		<p>Additionally, under OEIS Table 8-4 there is a note redlined next to two asterisks “**See Section 8.1.3.3 for information on the revised scope and risk reduction for this program.” There are no double asterisks in the table.</p> <p>In the April 2, 2024, submission of its Revised Base WMP, there were double asterisks next to the % Risk Impact 2025 (“n/a”) for Distribution Infrared Inspections (WMP.481).</p> <p>SDG&E must clarify its use of asterisks with notes in OEIS Table 8-4.</p>
<p>8.1.2.10.2 Strategic Pole Replacement Program (WMP.1189)</p>	<p>p. 179/209 Revised Base WMP redlined</p> <p>p. 177/207 Revised Base WMP clean</p>	<p>There appears to be a word or words missing from the sentence: “Beginning in 2024, the program a second category of high-risk poles to be replaced.”</p> <p>SDG&E must revise this sentence to include missing words.</p>
<p>8.1.4.5 Hotline Clamp Replacement Program (WMP.464)</p>	<p>p. 224/254 Revised Base WMP redlined</p> <p>p. 222/252 Revised Base WMP clean</p>	<p>SDG&E changed the data gathering period for initiative WMP.464 from ending “by the end of 2022” to “by the end of 2025” (“Data from historical wire downs associated with connection failures, ignition percentages within the HFTD, and the number of replacements expected by the end of 2025 2022 were gathered”). The sentence following that speaks of the data gathering period in the past tense: “Ignitions were shown to be reduced by 0.008 0.0265 ignitions per year over the 3-year WMP cycle,” presumably referring to the WMP cycle that ended in 2022, the original end of the data gathering period.</p>

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Section	Document page number/ PDF page number	Correction or Clarification
		<p>SDG&E must clarify the sentence reporting the annual reduction in ignitions to specify that it is referencing the 2020-2022 WMP cycle or rewrite it to indicate which historical period it is referencing.</p>
<p>8.2.1.2 Targets</p>	<p>p. 258/288 Approved Base WMP</p> <p>p. 265/295 Revised Base WMP redlined</p> <p>p. 262/292 Revised Base WMP clean</p>	<p>In SDG&E’s approved Base WMP, “OEIS Table 8-15: Vegetation Inspections Targets by Year,” the quarterly inspection target for Detailed Inspection (WMP.494) has the following value:</p> <ul style="list-style-type: none"> • x% Risk Impact 2025: 24.85% <p>The Revised Base WMP (redlined and clean) has the following new/changed header row text and value not redlined:</p> <ul style="list-style-type: none"> • % Risk Impact 2025: 24.8484% <p>In OEIS Table 8-15 of its Revised Base WMP, SDG&E must show updated 2025 risk impact estimates properly redlined.</p> <p>Additionally, in SDG&E’s approved Base WMP, the quarterly inspection target for Off-Cycle Patrol (WMP.508) has the following value:</p> <ul style="list-style-type: none"> • Target End of Q2 2024 & Unit: 9 VMAs <p>The Revised Base WMP (redlined and clean) has the following new/changed value:</p> <ul style="list-style-type: none"> • Target End of Q2 2024 & Unit: 106 VMAs <p>The 2024 targets cannot be changed in the Revised Base WMP.</p>

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Section	Document page number/ PDF page number	Correction or Clarification
		<p>SDG&E must revert the Q2 2024 target for WMP.508 to the approved target of 9 VMAs in OEIS Table 8-15.</p> <p>Additionally, updated targets for 2025 must be redlined in the Revised Base WMP.</p> <p>SDG&E’s change to the end of its Q2 2025 target for Off-Cycle Patrol (WMP.508) is not reflected in the Revised Base WMP.</p> <ul style="list-style-type: none"> • Revised Base WMP end of Q2 2025 target: “106 VMAs” (p. 265) • 2025 WMP Update end of Q2 2025 target (new): “9” (p. 41) <p>SDG&E must show updated 2025 targets from its approved Base WMP in the Revised Base WMP redlined version for OEIS Table 8-15 redlined.</p>
<p>8.2.3 Vegetation and Fuels Management (WMP.497)</p>	<p>pp. 276-277/ 306-307 Revised Base WMP redlined</p> <p>pp. 273-274/ 303-304 Revised Base WMP clean</p>	<p>In the Revised Base WMP redlined version, “Figure 8-29: Fuels Modification Sites Using CRI and WRRM,” p. 276, “CRI” was struck out in a sentence that cites Figure 8-29 “(see Figure 8-29).” However, on p. 277, the title of Figure 8-29 retains “CRI.” It is unclear if the title of Figure 8-29 was supposed to be changed to “Risk Assessment and Mapping” as shown on p. 276.</p> <p>SDG&E must reconcile as redlined the two references to Figure 8-29 on pages 276 and 277.</p>
<p>8.3.1.1 Objectives</p>	<p>p. 298/328 Revised Base WMP redlined</p>	<p>In the Revised Base WMP (redlined version only), “OEIS Table 8-21 Situational Awareness Initiative Objectives (3-year plan)” – Objective number “.8.303” should be 8.3.03.</p>

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Section	Document page number/ PDF page number	Correction or Clarification
		SDG&E must correct its reference to “8.3.03.”
8.3.1.2 Targets	<p>p. 297/327 Approved Base WMP</p> <p>p. 305/335 Revised Base WMP redlined</p> <p>p. 302/332 Revised Base WMP clean</p>	<p>In its approved Base WMP, “OEIS Table 8-23 Situational Awareness Initiative Targets by Year,” for WMP.970 (AQI Sensor – Installation) SDG&E has the following values:</p> <ul style="list-style-type: none"> • 2023 Target & Unit: 6 sensors • 2024 Target & Unit: 6 sensors <p>The Revised Base WMP (redlined and clean) has the following values redlined:</p> <ul style="list-style-type: none"> • 2023 Target & Unit: 5 sensors • 2024 Target & Unit: 0 sensors <p>2023 and 2024 targets cannot be changed in the Revised Base WMP.</p> <p>SDG&E must remove redlined text and revert the 2023 and 2024 targets for WMP.970 to the approved targets of 6 sensors for 2023 and 6 sensors for 2024.</p>
8.3.2.1.2 Fuel Moisture (WMP.1334)	<p>p. 308 /338 Revised Base WMP redlined</p> <p>p. 305/335 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), “U.S. Forrest service” should be U.S. Forest Service</p> <p>SDG&E must correct its spelling of U.S. Forest Service.</p>

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Section	Document page number/ PDF page number	Correction or Clarification
<p>8.3.2.3 Planned Improvements: 8.3.2.3.2 Fuel Moisture (WMP.1334)</p>	<p>p. 310/340 Revised Base WMP redlined</p> <p>p. 307/337 Revised Base WMP clean</p>	<p>In Revised Base WMP (redlined and clean), “U.S. Forrest Service” should be U.S. Forest Service.</p> <p>SDG&E must correct its spelling of U.S. Forest Service.</p>
<p>8.3.5.5.5 Internal Processes for Updating Enterprise System Including Database(s)</p>	<p>p. 337/367 Revised Base WMP redlined</p> <p>p. 334/364 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E’s text in the body and in the text for footnote 38 refers to Twitter. “Twitter” became “X” on July 23, 2023. The reference should be updated in the body and footnote [e.g., “X (formerly Twitter)” or “X.com (formerly Twitter.com).”]</p> <p>SDG&E must update its reference to Twitter.</p>
<p>8.5.1.2 Targets</p>	<p>pp. 399-400/ 429-430 Revised Base WMP redlined</p> <p>pp. 395-396/ 425-426 Revised Base WMP clean</p>	<p>In its approved Base WMP, in “OEIS Table 8-56 PSPS Outreach and Engagement Initiative Targets by Year,” for PSPS Stakeholder Education and Awareness (WMP.1337), the End of Year Target 2023 & Unit were:</p> <ul style="list-style-type: none"> • "Host at least one functional PSPS exercise annually including relevant stakeholders." <p>The End of Year Target 2023 & Unit in SDG&E’s Revised Base WMP is:</p> <ul style="list-style-type: none"> • "Host functional PSPS exercise including relevant stakeholders."

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Section	Document page number/ PDF page number	Correction or Clarification
		<p>SDG&E must revert the text of its End of Year Target 2023 & Unit for WMP.1337 in its Revised Base WMP (redlined and clean) to the text of its End of Year Target 2023 & Unit in its approved Base WMP.</p>
<p>Appendix F “Tables”</p>	<p>pp. 1-2/ 979-980 Revised Base WMP redlined</p>	<p>In its Revised Base WMP (redlined version) “OEIS Table 8-44 State and Local Agency Collaboration(s)” the text in the table under Point of Contact and Information (“(Contact information is confidential in Accordance with California Law and Regulations)”) is struck out in black.</p> <p>SDG&E must correctly reflect changes to its approved Base WMP properly redlined.</p>

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The 2025 Wildfire Mitigation Plan Update Guidelines require that the 2025 WMP Update document “describes the electrical corporation's proposed updates” and that the Redlined 2023-2025 Base WMP “[shows] proposed updates to the approved 2023-2025 Base WMP.”¹⁴ There are 37 instances in SDG&E’s Revised Base WMP (in the redlined version and nearly always replicated in the clean version) where SDG&E inappropriately references its 2025 WMP Update instead of updating the text in its Revised Base WMP.

SDG&E must delete all language in its Revised Base WMP (redlined and clean versions) that references its 2025 WMP Update document and replace those references with text that appropriately reflects the changes described in its 2025 WMP Update document.

Table 2B. Non-Substantive Errors in SDG&E Revised Base WMP (Redlined Version) Submitted May 14, 2024:¹⁵ References to SDG&E 2025 WMP Update

Section	Document page number/ PDF page number	Text Improperly Citing 2025 WMP Update
6.2.1 Risk and Risk Component Identification	p. 62/92 Revised Base WMP (redlined and clean)	In Revised Base WMP (redlined and clean versions), SDG&E states, “See Section 1 of the 2025 WMP Update for details on version 4.0 model enhancements.”

¹⁴ [2025 Wildfire Mitigation Plan Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), Required Components of 2025 WMP Update, pp 3-4 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed May 6, 2024).

¹⁵ The version of the 2023-2025 WMP referenced in this table is the one submitted May 14, 2024: [2023-2025 Wildfire Mitigation Plan San Diego Gas & Electric, October 23, 2023 \[Redline Non-Substantive Errata Version May 14, 2024\]](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56684&shareable=true) (Redacted version) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56684&shareable=true, accessed May 20, 2024).

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Section	Document page number/ PDF page number	Text Improperly Citing 2025 WMP Update
7.2.2.1 Projected Overall Risk Reduction	<p>p. 125/155 Revised Base WMP redlined</p> <p>p. 124/154 Revised Base WMP clean</p>	<p>In Revised Base WMP (redlined and clean), SDG&E states, “See the 2025 WMP Update (Section 5, ACI 23-06 Figure 9) for an updated graph displaying expected risk reduction, and Section 1 for qualitative updates to the WiNGS-Planning model.”</p>
7.2.2.3 Projected Risk Reduction on Highest-Risk Circuits Over the Three-Year WMP Cycle	<p>p. 130/160 Revised Base WMP redlined</p> <p>p. 129/159 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “Refer Section 1 of the 2025 WMP Update for a revised ranking of circuit segments) [sic].”</p>
8.1.2.1 Covered Conductor Installation (WMP.455)	<p>p. 156/186 Revised Base WMP (redlined and clean)</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
8.1.2.2 Undergrounding of Electric Lines and/or Equipment (WMP.473)	<p>p. 156/186 Revised Base WMP (redlined and clean)</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>

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Section	Document page number/ PDF page number	Text Improperly Citing 2025 WMP Update
<p>8.1.2.5.1 Distribution Overhead System Hardening (Traditional) (WMP.475)</p>	<p>p. 162/192 Revised Base WMP redlined</p> <p>p. 160/190 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
<p>8.1.2.5.2 Transmission System Hardening Program (WMP.543, WMP.544, WMP.545)</p>	<p>p. 164/194 Revised Base WMP redlined</p> <p>p. 162/192 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “These initiatives were updated for 2025 and can be found in the 2025 WMP Update.”</p>
<p>8.1.2.7 Microgrids (WMP.462)</p>	<p>p. 166/196 Revised Base WMP redlined</p> <p>p. 164/194 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025. Updates can be found in the 2025 WMP Update.”</p>

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Section	Document page number/ PDF page number	Text Improperly Citing 2025 WMP Update
<p>8.1.2.8.1 Advanced Protection (WMP.463)</p>	<p>p. 168/198 Revised Base WMP redlined</p> <p>p. 166/196 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
<p>8.1.2.8.2 Early Fault Detection (WMP.1195)</p>	<p>p. 172/202 Revised Base WMP redlined</p> <p>p. 169/199 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
<p>8.1.2.8.3 Distribution Communications Reliability Improvements (WMP.549)</p>	<p>p. 175/205 Revised Base WMP redlined</p> <p>p. 173/203 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>

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Section	Document page number/ PDF page number	Text Improperly Citing 2025 WMP Update
<p>8.1.2.10.1 Avian Protection Program (WMP.972)</p>	<p>p. 177/207 Revised Base WMP redlined</p> <p>p. 174/204 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
<p>8.1.2.10.2 Strategic Pole Replacement Program (WMP.1189)</p>	<p>p. 178/208 Revised Base WMP redlined</p> <p>p. 176/206 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
<p>8.1.2.11.2 Standby Power Program (Fixed Backup Power: Residential/Commercial) (WMP.468)</p>	<p>p. 181/211 Revised Base WMP redlined</p> <p>p. 178/208 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>

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Section	Document page number/ PDF page number	Text Improperly Citing 2025 WMP Update
<p>8.1.2.11.3 Generator Grant Program (WMP.466)</p>	<p>p. 183/213 Revised Base WMP redlined</p> <p>p. 181/211 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
<p>8.1.2.11.4 Generator Assistance Program (WMP.467)</p>	<p>p. 185/215 Revised Base WMP redlined</p> <p>p. 182/212 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
<p>8.1.3.1 Distribution Overhead Detailed Inspections (WMP.478)</p>	<p>p. 188/218 Revised Base WMP redlined</p> <p>p. 186/216 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>

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Section	Document page number/ PDF page number	Text Improperly Citing 2025 WMP Update
<p>8.1.3.2 Transmission Overhead Detailed Inspections (WMP.479)</p>	<p>p. 191/221 Revised Base WMP redlined</p> <p>p. 188/218 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
<p>8.1.3.3 Distribution Infrared Inspections (WMP.481)</p>	<p>p. 194/224 Revised Base WMP redlined</p> <p>p. 192/222 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
<p>8.1.3.4 Transmission Infrared Inspections (WMP.482)</p>	<p>p. 196/226 Revised Base WMP redlined</p> <p>p. 194/224 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>

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Section	Document page number/ PDF page number	Text Improperly Citing 2025 WMP Update
<p>8.1.3.5 Distribution Wood Pole Intrusive Inspections (WMP.483)</p>	<p>p. 198/228 Revised Base WMP redlined</p> <p>p. 196/226 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
<p>8.1.3.6 Transmission Wood Pole Intrusive Inspections (WMP.1190)</p>	<p>p. 201/231 Revised Base WMP redlined</p> <p>p. 199/209 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
<p>8.1.3.7 Drone Assessments (WMP.552)</p>	<p>p. 201/231 Revised Base WMP redlined</p> <p>p. 199/209 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>

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Section	Document page number/ PDF page number	Text Improperly Citing 2025 WMP Update
<p>8.1.3.9 Transmission Overhead Patrol Inspections (WMP.489)</p>	<p>p. 209/239 Revised Base WMP redlined</p> <p>p. 207/237 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
<p>8.1.3.12.1 LiDAR Inspections of Transmission and Distribution Electric Lines and Equipment</p>	<p>p. 216/246 Revised Base WMP redlined</p> <p>p. 214/244 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
<p>8.1.4.4 Expulsion Fuse Replacement Program (WMP.459)</p>	<p>p. 221/251 Revised Base WMP redlined</p> <p>p. 219/249 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>

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Section	Document page number/ PDF page number	Text Improperly Citing 2025 WMP Update
8.1.4.5 Hotline Clamp Replacement Program (WMP.464)	<p>p. 223/253 Revised Base WMP redlined</p> <p>p. 221/251 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
8.1.6.2 QA/QC of Distribution Detailed Inspections (WMP.491)	<p>p. 235/265 Revised Base WMP redlined</p> <p>p. 232/262 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states:</p> <ul style="list-style-type: none"> • “This initiative was updated for 2025 and can be found in the 2025 WMP Update.” • “See ACI SDGE-23-13 (2025 WMP Update) for details on the enhancement of QA/QC for distribution detailed inspections.”
8.1.6.4 QA/QC of Transmission & Distribution Wood Pole Intrusive Inspections (WMP.1193)	<p>p. 235/265 Revised Base WMP redlined</p> <p>p. 232/262 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>

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Section	Document page number/ PDF page number	Text Improperly Citing 2025 WMP Update
8.1.8.3.3 Aviation Firefighting Program (WMP.557)	p. 245/275 Revised Base WMP redlined	In its Revised Base WMP (redlined version only), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”
8.2.2.1 Detailed Vegetation Inspections (WMP.494)	p. 268/298 Revised Base WMP redlined p. 265/295 Revised Base WMP clean	In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”
8.3.2.1.1 Weather Stations and Normalized Difference Vegetation Index (NDVI) Cameras (WMP.447)	p. 307/337 Revised Base WMP redlined p. 304/334 Revised Base WMP clean	In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”

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Section	Document page number/ PDF page number	Text Improperly Citing 2025 WMP Update
8.3.2.1.3 Air Quality Management Program (WMP.970)	<p>p. 308/338 Revised Base WMP redlined</p> <p>p. 305/335 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
8.3.3.1 Existing Systems, Technologies, and Procedures	<p>p. 314/344 Revised Base WMP redlined</p> <p>p. 311/341 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>
8.3.6 Fire Potential Index (WMP.450)	<p>p. 337/367 Revised Base WMP redlined</p> <p>p. 334/364 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>

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Section	Document page number/ PDF page number	Text Improperly Citing 2025 WMP Update
<p>8.4.2 Emergency Preparedness Plan</p>	<p>p. 349/379 Revised Base WMP redlined</p> <p>p. 346/376 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative (WMP.1008) was updated for 2025 and can be found in the 2025 WMP Update.”</p>
<p>8.4.4 Public Emergency Communication Strategy (WMP.563)</p>	<p>p. 383/413 Revised Base WMP redlined</p> <p>p. 379/409 Revised Base WMP clean</p>	<p>In its Revised Base WMP (redlined and clean), SDG&E states, “This initiative was updated for 2025 and can be found in the 2025 WMP Update.”</p>