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VIA ELECTRONIC FILING

Docket # Data Guidelines

Shafi Mohammed
Chief Data Officer, Data Analytics Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: San Diego Gas & Electric, Southern California Edison, Pacific Gas and Electric, PacifiCorp and Bear Valley Joint Comments on Draft Data Guidelines v4.1

Dear Chief Data Officer Mohammed:

San Diego Gas & Electric Company, Southern California Edison Company, Pacific Gas and Electric Company, PacifiCorp, and Bear Valley (the "Joint ECs") provide the following joint comments addressing the Draft Data Guidelines v4.1 ("Draft Guidelines") issued by the Office of Energy Infrastructure Safety ("Energy Safety") on October 27, 2025.

I. COMMENTS

a. Request to Modify Submission Implementation Date and Suggested Report Streamlining

Draft Guidelines state that v4.1 is effective on January 1, 2026, which does not allow adequate time to revise processes and automated data logic from v4.0 Data Guidelines. The Joint ECs request that Energy Safety allow electrical corporations to maintain v4.0 Data Guidelines through Q4 2025 reporting and implement v4.1 effective Q1 2026.

The Joint ECs continue to recommend revising Energy Safety's Data Guidelines to allow quarterly submissions to reflect cumulative, year-to-date reporting of WMP Activity target completion, Risk Event, PSPS Event, and Initiative feature datasets. This approach would streamline reporting of metrics throughout the WMP and calendar year and allow electrical corporations to focus efforts on the current quarter, resulting in improved data quality. The Joint ECs maintain this method would allow for the most

seamless and transparent flow of information to Energy Safety, eliminating an additional revision reporting template and additional report submissions, confusion between multiple report versions, and the need for Energy Safety to issue additional data requests to clarify deltas in data presented.

b. Inclusion of Geographic Information Systems (GIS) Data Fields and GDB template accessibility

To ensure consistency and improve usability of spatial data for field verification and grid reliability, the Joint ECs request inclusion of the following fields:

1. 'FieldNotes' in Other Initiative Feature Class (to align with other WMP section formats).
2. 'ProgramID' in Initiative Audits to identify the auditing program (e.g., VM-22)

The Joint ECs request that Energy Safety review the 4.1 GDB template for accessibility, as certain versions of FME, ESRI, and ARCPRO do not support "date only", "time only", "timestamp offset", and "big integer" data types in the new schema.

II. CONCLUSION

The Joint ECs requests that Energy Safety take these recommendations into account in the Final Data Guidelines v4.1.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company