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VIA ELECTRONIC FILING

Docket # 2026-2028-Base-WMPs

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

RE: Comments on Energy Safety's Draft Decision for SDG&E's 2026-2028 Base Wildfire Mitigation Plan

Dear Director Thomas Jacobs:

San Diego Gas & Electric ("SDG&E" or "Company") hereby provides opening comments on the Office of Energy Infrastructure Safety's ("Energy Safety") Draft Decision approving SDG&E's 2026-2028 Base Wildfire Mitigation Plan ("WMP" or "Plan") issued on November 25, 2025. SDG&E appreciates Energy Safety's thoughtful and thorough review of SDG&E's 2026-2028 Base WMP and requests that Energy Safety incorporate the requested revisions and modifications listed below.

I. COMMENTS

A. SDGE-26B-02. Quantification of Wildfire Consequence Scaling Factors

SDG&E would like to clarify that its consequence modeling does consider social and physical vulnerability aspects. For PSPS risk, this includes a categorization of customers at risk for PSPS, including Critical Facilities, AFN, Medical Baseline, Essential, and Sensitive customers. For wildfire risk, the estimated acres burned and buildings destroyed as simulated by Technosylva's model are utilized to estimate the number of people at risk based on the historical ratio of equivalent fatalities per structure destroyed derived from the CAL FIRE dataset. Safety impacts are estimated by the number of customers expected to be affected by a wildfire or PSPS de-energization. Scaling factors are then added, where customer information is available, to more accurately capture impacts on customers that are more vulnerable to either event.

SDG&E requests that the requirement to account for suppression impacts be removed from SDGE-26B-02. SDG&E does not currently include fire suppression analysis in its wildfire-

related models and provides its rationale for selecting Technosylva's unsuppressed wildfire simulations with a 24-hour duration¹. Briefly, the transition from an 8-hour to a 24-hour simulation period is supported by the observed alignment between SDG&E's Generalized Pareto Distribution (GPD) model, which incorporates suppression based on historical wildfire events, and Technosylva's 24-hour monetized consequence estimates. SDG&E demonstrated that Technosylva's unsuppressed 24-hour simulations align closely, even conservatively, with two of the most catastrophic fires in SDG&E's service territory: the Cedar Fire (2003) and the Witch Fire (2007). These comparisons validate the robustness of the 24-hour modeling approach for extreme fire weather scenarios.

SDG&E believes that electric utilities should not be responsible for developing fire suppression models, as they lack the necessary expertise, operational influence, and direct involvement in suppression activities. Instead, the exploration and development of such models should be a collaborative effort led by first responders, academic institutions, and other relevant stakeholders. This approach will help ensure accuracy, credibility, and practical value before any consideration of integrating these models into utility planning or operational frameworks. Incorporating suppression into Technosylva's 8-hour or 24-hour models would be highly complex due to numerous unpredictable variables such as terrain, resource availability, human decision-making, and weather conditions. Attempting to model fire suppression could therefore lead to inaccurate assumptions, potentially underestimating risk.

SDG&E remains committed to continuously improving its modeling assumptions and methodologies to more accurately reflect wildfire risk within its service territory. As part of this commitment, SDG&E is actively working with Technosylva to update its consequence model for the upcoming GRC filing. Full documentation and detailed explanations of all updates will be provided to ensure transparency and maintain stakeholder confidence.

B. SDGE-26B-03. Further Evaluation of Climate Change Impact on Extreme Scenarios

SDGE-26B-03 instructs SDG&E to work with other IOUs to evaluate potential climate change impacts, including evaluating variables such as extreme wind events, extreme drought impacts, and vegetation pattern changes. However, in-depth analyses of climate-driven factors, including these variables, are best conducted by climate scientists, academic institutions, and specialized risk experts as they have the expertise, resources, and advanced modeling capabilities required for this highly specialized and technically complex work. Therefore, SDG&E asks that this Area of Continued Improvement be removed.

SDG&E will collaborate with experts to understand how long-term climate trends may influence the likelihood of ignition from electrical assets. This collaboration will help SDG&E

¹SDG&E. (2025). *SDG&E Ramp Report*, Chapter SDGE-Risk-4 Wildfire and PSPS, pp. 25 to 30. Available at: https://www.sdge.com/sites/default/files/regulatory/SDGE%202025%20RAMP%20Report_PDF%200.pdf

design and implement grid-hardening strategies that are both effective and cost-efficient, ensuring public safety while meeting regulatory expectations.

Cal-Adapt's most recent wildfire projection dataset is based on the outdated CMIP5-based work by Westerling (2018)². Efforts are currently underway by the UC Merced research team to update wildfire projections using the latest CMIP6 simulation results, which will be used for the upcoming Fifth Climate Change Assessment, a multi-year research effort with reports, data, and key findings. This data is expected to be released in Q1 2026; however, this deadline may not be met based on the inability to meet prior deadlines. Once the Fifth Climate Change Assessment is complete, SDG&E intends to incorporate updated climate change projections in its risk models.

C. SDGE-26B-06: Development of Substantive Model Documentation

In response to OEIS Data Request OEIS-P-WMP_2025-SDGE-06, Question 4, SDG&E provided Appendix B Table – Detailed Model Documentation_5_23_25.xlsx, which included:

- A detailed description of each risk model, including assumptions and statistical approaches used.
- Information on datasets used for modeling probability of ignition, consequence, weather, and fuels, including data sources and rationale for inclusion.
- A description of verification and validation approaches for each model.

SDG&E would like clarification on whether the documentation provided in the Appendix B Table satisfies the requirements outlined in this Area of Continued Improvement or if additional detail or format adjustments are needed for the next WMP Update.

D. SDGE-26B-08: Prioritization of Riskiest Areas

This Area of Continued Improvement requests an update of planned grid hardening projects from 2027 to 2029. SDG&E seeks clarification on the timeframe requested, as the WMP cycle spans through 2028.

SDG&E additionally requests clarification on the scope of information requested compared to the information SDG&E provided in the 2026-2028 Base WMP (Version R2). As mentioned in Section 6.2.1.3 of the 2026-2028 Base WMP (Version R2), OEIS Table 6-4: Summary of Risk Reduction for Top-Risk Circuits represents the top 15 highest-risk circuit segments comprising the top 20 percent Overall Utility Risk and shows projected annual Overall Utility Risk estimates from mitigations planned for the 2026 to 2028 WMP cycle. It also presents circuit segment risk-rankings from previous versions of WiNGS-Planning, which were the

² Westerling, A.L. (University of California, Merced). 2018. *Wildfire Simulations for California's Fourth Climate Change Assessment: Projecting Changes in Extreme Wildfire Events with a Warming Climate*. California's Fourth Climate Change Assessment, California Energy Commission. Publication Number: CCA4-CEC-2018-014. Available at: https://www.energy.ca.gov/sites/default/files/2019-11/Projections_CCA4-CEC-2018-014_ADA.pdf

versions that informed the hardening scope for 2026 through 2028. Interim mitigation activities such as PSPS, SRP, and advanced protection will be utilized on the highest-risk segments. The complete work scope for Strategic Undergrounding and Combined Covered Conductor for the 2026 to 2028 WMP cycle is provided in Appendix G and in OEIS Table 6-4 (full table is provided in Appendix F of the 2026-2028 Base WMP).

For clarity, the table below cross-references the information provided in OEIS Table 6-4 (Version R2) with the requirements outlined in SDGE-26B-08:

SDGE-26B-08 Requirement	Provided in OEIS Table 6-4 (Version R2)
Circuit Segment ID	Included
Type of hardening	Included
Status of the project	Not Included in R2
WiNGS 2.0 Risk Score	Not Included in R2
WiNGS 2.0 Risk Rank	Included
WiNGS 3.0 Risk Score	Not Included in R2
WiNGS 3.0 Risk Rank	Included
WiNGS 4.0 Risk Score	Included
WiNGS 4.0 Risk Rank	Included
Risk model version used for prioritization	Not Included in R2
Expected year for implementation	Included
Planned length	Not Included in R2

As SDG&E does not anticipate any updates to the circuit segments listed in OEIS Table 6-4 for the 2026 to 2028 WMP cycle, SDG&E is seeking clarification that submitting the same list of circuit segments with the additional columns identified as “Not Included in R2” above will satisfy the requirement for this Area of Continued Improvement.

E. SDGE-26B-12. De-energized Transmission Line Assessment and Removal

In response to OEIS Data Request OEIS-P-WMP_2025-SDGE-10, SDG&E provided a response in addition to documents “OutOfServiceSummary.pdf” and “OOSServiceCircuitSummary-AppendixA.pdf”, which included:

- A review of potential ignition hazards such as electrostatic and electromagnetic induction
- A comparative summary of potential grounding alternatives and associated potential risks including different types of inductions
- An evaluation of fault current magnitudes for the three out-of-service transmission lines SDG&E maintains within the HFTD that included multiple

factors such as site-specific line length, geometry, and impedance values to evaluate at multiple potential fault locations.

- A complete breakdown of parallel lines adjacent to current idle transmission lines including distance between lines, length the lines parallel, and voltage class of parallel lines

SDG&E would like clarification on whether the documentation provided in the previous data request and cited in SDGE-26B-12 as “Corridor Induction Risk Assessment of Out-of-Service Transmission Lines in SDG&E HFTD” satisfies the requirements outlined in the second and third major bulleted areas of this Area of Continued Improvement or if additional detail or format adjustments are needed.

F. SDGE-26B-17. Detailed Distribution Inspection Audits

SDGE-26B-17 states that SDG&E did not set targets for Detailed Distribution Audits, however, the targets were set but were not included in Table 8-4 of the 2026-2028 Base WMP. As stated in the 2026-2028 Base WMP Section 8.5.4.2 Pass Rate Calculation, “additionally, 5 percent of inspections in the HFTD that have no findings are randomly selected for audit by a quality assurance advisor. This audit, which occurs within 1 month following the end of the month the inspection was completed, can involve either a field visit or a desktop review of images collected during the inspection.”

In addition, SDG&E stated in SDGE-25U-07 Progress On Inspection QA/QC Program Change, beginning in 2025, “a random sampling of 5 percent of inspections performed within the HFTD with no findings will be audited by a quality assurance advisor via a field visit or a desktop review of images collected during the inspection within 1 month following the end of the month the inspection was completed.”

In lieu of this Area of Continued Improvement, SDG&E proposes to add the 5 percent target in Table 8-4 during the 2027 WMP Update process.

G. SDGE-26B-19. Implementing Proactive HFTD Inspections

SDG&E recommends removing all references to the High Fire-Threat District (HFTD) related to this mitigation and adopting language that reflects a risk-based, modeled prioritization approach. Because Off-Cycle Patrols are prioritized through a risk-based approach, references to the HFTD are inaccurate and should be removed from this ACI. SDG&E is tasked with identifying risk and leveraging various tools to determine inspection locations across the entire service territory. Areas with the potential for immediate fire impact have become an increasing focus for mitigation. Therefore, SDG&E seeks to avoid committing to limiting these activities exclusively to the HFTD.

II. CONCLUSION

SDG&E thanks Energy Safety for their thoughtful review and requests that Energy Safety take these recommendations into account in the process of issuing a final approval of SDG&E's 2026-2028 Base WMP.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company