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VIA E-MAIL

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

No. 2021-IE

**RE: COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) IN  
RESPONSE TO THE FINAL INDEPENDENT EVALUATOR ANNUAL REPORT  
ON COMPLIANCE**

Dear Director Thomas Jacobs:

San Diego Gas & Electric Company (SDG&E) files its comments addressing the Independent Evaluator's Final Annual Report on Compliance (Report) regarding SDG&E's Wildfire Mitigation Plan (WMP) filed on June 30, 2021.<sup>1</sup>

**I. Introduction**

SDG&E appreciates the opportunity to provide responses to the Independent Evaluator Report as well as the stakeholder comments filed on August 6, 2021. SDG&E's comments focus on proving clarity regarding misunderstandings or inaccuracies contained in the Report, specifically with respect to the status of SDG&E's vegetation management program and Enhanced Vegetation Management efforts, distribution asset locations, and program spending. Like others, SDG&E also appreciates that the compressed schedule made it difficult for the Independent Evaluator to clarify areas of misunderstanding and believes that certain findings in the Report might have been refined or revised if SDG&E had the opportunity to provide additional detail. To that end, SDG&E agrees with the general sentiment expressed in previous comments that improvements to the Independent Evaluator review process will foster increased insight and accuracy in future years.

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<sup>1</sup> *Final Independent Evaluator Report on Compliance*, 4LEAF, Inc., and AerialZeus, LLC (June 30, 2021) (Report); available at [https://energysafety.ca.gov/wp-content/uploads/docs/misc/wsd/independent-evaluators/sdge-ie-arc\\_final.pdf](https://energysafety.ca.gov/wp-content/uploads/docs/misc/wsd/independent-evaluators/sdge-ie-arc_final.pdf).

## II. General Recommendations

The Report repeatedly notes the impacts of the short timeframe allowed for evaluation of SDG&E's WMP compliance as well as preparation of the Report. As noted in Cal Advocates' comments, the Independent Evaluator had less than two months to gather documentation, conduct field surveys, perform staff interviews, analyze the information, and prepare a report.<sup>2</sup> As further discussed below, this timeframe increased the difficulty for both the production of data and well as its review. Correspondingly, certain aspects of SDG&E's Report reflect inaccuracies that could have been corrected or clarified with additional time. In preparing for future reports, SDG&E recommends that OEIS allow additional time for both production of the Independent Evaluator Reports as well as a timeframe for review and correction of those reports. These process enhancements would facilitate greater accuracy and allow all stakeholders to gain a more thorough understanding of electrical corporations' WMP compliance efforts. SDG&E specifically recommends that future Independent Evaluator Guidelines include a period during which the electrical corporation may, in concert with OEIS, review the initial Independent Evaluator Reports and correct any identifiable factual inaccuracies or clarify reporting errors. This enhancement would foster a better understanding of compliance and allow stakeholder comments to more comprehensively address any areas of concern.

While SDG&E agrees with Cal Advocates on the need for additional time for future reviews by the Independent Evaluator, SDG&E does not believe that its 2020 Report requires further investigation by OEIS.<sup>3</sup> SDG&E's Report did not note any significant concerns regarding its WMP compliance efforts. Any areas of concern noted in SDG&E's Report are primarily the product of insufficient time for compilation and review, as further addressed below. None of these areas require any further investigation by OEIS.<sup>4</sup>

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<sup>2</sup> *Comments of the Public Advocates Office on the Final Independent Evaluator Annual Reports on Compliance*, August 6, 2021 (Comments of Cal Advocates) at 2-3.

<sup>3</sup> Cal Advocates Comments at 3.

<sup>4</sup> SDG&E also notes that its Report did not include any indication that the Independent Evaluator was not able to obtain sufficient records for review. SDG&E believes that again, the record access issues identified in Cal Advocates' Comments may primarily be the product of the timeframe at issue for the 2020 Reports. As SDG&E remains committed to providing its Independent Evaluator all information necessary for it to perform its review, it is unnecessary to specifically establish a process to address any instances where the Independent Evaluator believes it is not receiving responsive data. See Comments of Cal Advocates at 2, 4.

### **III. The Location Records for SDG&E's Distribution Assets Are Accurate**

The Report states that eight assets, constituting 2.1% of the selected population, could not be found due to wrong or imprecise GPS-coordinates provided by SDG&E<sup>5</sup>. SDG&E has accurate location records for all assets. Some of these assets are located off the main road or may be located on private property, which could have led to difficulty locating the assets; but SDG&E maintains that the GPS coordinates provided for these assets are accurate. During any future inspections, SDG&E will make field personnel available to assist with providing access to and assistance with locating its assets.

### **IV. SDG&E's Financial Spend Focuses on Best Practices and Supporting Safety**

SDG&E would like to clarify the circumstances of the underspend reported in the Report related to initiative 5.3.5.9, Vegetation Management and Inspections Trim/Remove.<sup>6</sup> As reported in the SDG&E Annual Report on Compliance filed April 1, 2021, there was a collective overspend on all SDG&E WMP vegetation management initiatives of approximately seventeen million dollars. The Report correctly notes that SDG&E was underspent for its Enhanced Vegetation Management initiative, which is SDG&E's program directed at obtaining tree clearances above and beyond regulatory requirements and up to 25 feet where achievable. But even though SDG&E's Enhanced Vegetation Management costs did not meet its 2020 forecast, SDG&E would like to clarify that it achieved 100% of the target units for Enhanced Vegetation Management efforts and met the risk reduction intent for the WMP year. The underspend can be attributed to this being a new program where the spend required for enhanced trims can be difficult to forecast as trees identified for enhanced clearances are found as a result of SDG&E's inspections based on tree health, species, and circumstances.

For future WMP Independent Evaluator Reports, SDG&E also notes that while using WMP actual spend compared to forecasts may be one factor for measuring compliance, the mere fact that an electrical corporation under (or over) spent on a program may not necessarily provide an accurate metric to fully assess compliance. If SDG&E achieves the forecasted risk reduction or number of units but does so at a lower cost due to increasing efficiencies, that is both a good outcome for safety as well as ratepayers. In future years, OEIS should clarify that the Independent Evaluator may note any variances in spend from WMP forecasts, but any variance should not be identified as a deficiency.

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<sup>5</sup> Report at 21.

<sup>6</sup> Report at 42.

## **V. SDG&E's Vegetation Management Efforts**

### **a. SDG&E's Enhanced Vegetation Management Program Assesses Tree Risk Based on Several Factors, Not Solely Tree Species**

SDG&E appreciates the comments submitted by Mussey Grade Road Association (MGRA) regarding the trimming of specific tree types. SDG&E maintains the vegetation in its service territory to mitigate the risk of wildfire. SDG&E reiterates that tree trims and removals, including Enhanced Vegetation Management activities, are performed after SDG&E inspects and assesses trees based on numerous factors, including the tree genus/species, tree health, structural deficiencies, and location. SDG&E focuses its Enhanced Vegetation Management activities at certain types of trees that are known to cause increased risk to electrical infrastructure. But the fact that a certain tree genus may be trimmed more frequently than another is more a function of the tree's growth pattern and relative risk to SDG&E's system than it is a focus on trimming targeted at that genus.

### **b. SDG&E Is In Compliance With Its Vegetation Management Requirements**

The Report noted that twelve field reports observed "significant vegetation encroachment."<sup>7</sup> While the observers may have noted vegetation present, SDG&E would like to clarify that it is in compliance with all applicable vegetation management requirements. Upon review of the reports identified by the Independent Evaluator, SDG&E found that the twelve reports address three separate locations where the vegetation encroachment was noted. The first location, P114613, has vegetation near the base of the pole. SDG&E would like to note that the vegetation did not encroach upon the required clearances from energized conductor and is thus in compliance with all regulatory requirements. The second location, P510076, again has vegetation near the base of the pole. The vegetation did not encroach upon the required clearances from energized conductor and is therefore again in compliance with all regulatory requirements as well as SDG&E's WMP. The third location, D142979, was at an enclosed padmounted SCADA capacitor. The vegetation near the equipment is not in violation of the WMP and meets all regulatory requirements. By complying with all requirements as well as SDG&E's WMP, SDG&E does not believe that any of the vegetation noted in the Report poses a risk of causing a vegetation related outage or ignition. But out of an abundance of caution, SDG&E recently performed pole brushing on the poles identified in the Report and performed additional vegetation management trimming near the identified padmounted SCADA capacitor.

On July 15, 2021, SDG&E met with representatives of the Independent Evaluator as well as OEIS to discuss the findings of the Report and to gather further information

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<sup>7</sup> Report at 28.

about some of the vegetation issues noted therein. During the meeting, the Independent Evaluator also confirmed that, while noting the presence of vegetation, the Independent Evaluator did not observe any instances where the vegetation was out of compliance with either SDG&E's WMP or other regulatory requirements.

The IE report also noted seven inspection reports that found "old wooden poles that need replacement."<sup>8</sup> During the July 15 meeting, SDG&E also clarified with the Independent Evaluator that these poles did not have any visible defects or pose a safety hazard. The report only noted the poles because SDG&E's current standards use steel poles when installing new equipment in the HFTD.

**c. The Duplication In Work Orders Is The Product of SDG&E's Method of Data Extraction To Facilitate a Timely Review**

The Report discussed issues with duplicate work orders that caused some confusion in relation to vegetation management activities<sup>9</sup> and expulsion fuse replacements.<sup>10</sup> These findings are the result of confusion arising from SDG&E's efforts to quickly extract data to facilitate the Independent Evaluator's review. In order to enable a quick turnaround of the data to allow the Independent Evaluator to begin field inspections, SDG&E extracted all data from existing sources and it was not audited prior to submission. Due to the method of data extraction from SDG&E's systems, some work orders appeared more than once. The duplicate work orders noted by the Independent Evaluator are solely an error in the way the data was pulled. Had SDG&E had more time to audit and refine the data presentation, it would have eliminated these duplications in the dataset, because they were not meant to represent multiple work items in the same location.

SDG&E believes that these data extraction issues, as well as the other issues identified above, could have been rectified or clarified if the Independent Evaluator had more time to collect information and perform its review. SDG&E thus asks OEIS to consider supplying time for the IOUs to review future Independent Evaluator reports and to clarify any misunderstandings or correct factual errors prior to final submission. These sorts of data issues can be addressed up-front to reduce confusion for both the Independent Evaluator, OEIS, and other stakeholders reviewing the reports. Because most of the issues identified are the result of the compressed timeframe for review, SDG&E does not believe Cal Advocates' request for any further investigation is merited.<sup>11</sup>

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<sup>8</sup> Report at 21.

<sup>9</sup> Report at 26.

<sup>10</sup> Report at 21.

<sup>11</sup> Comments of Cal Advocates at 12-13.

Caroline Thomas Jacobs  
Office of Energy Infrastructure Safety  
August 16, 2021  
Page 6

## **VI. Conclusion**

SDG&E appreciates the work undertaken by its Independent Evaluator as well as the effort to provide accurate review of SDG&E's compliance with its 2020 WMP. SDG&E respectfully requests that OEIS consider these comments to better understand the findings contained in the Independent Evaluator Report, and to improve the process in future years.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company

cc: Service List in R.18-10-007