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VIA E-MAIL

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

**RE: SDG&E Comments on Energy Safety Risk Modeling Workshop  
Docket # Risk-Model-Group**

Dear Director Thomas Jacobs:

San Diego Gas & Electric Company (SDG&E) submits its comments to the Office of Energy Infrastructure Safety (Energy Safety) Risk Modeling Workshop held on October 5 and 6, 2021.

**A. WORKING GROUPS SHOULD FACILITATE CONSTRUCTIVE DISCUSSIONS REGARDING MODEL IMPROVEMENTS**

The Risk Modeling Workshop on October 5-6 included presentations from Pacific Gas & Electric (PG&E), Southern California Edison (SCE), San Diego Gas & Electric (SDG&E), PacifiCorp, Liberty, and Bear Valley Electric Service (BVES). While the workshop presentations prepared by the electrical corporations were informative, the workshop also demonstrated that productive, facilitated conversations are a more effective tool to understand each electrical corporation's risk modeling method and the benefits thereof. Assembling extensive workshop presentations takes significant time and effort on behalf of the utility and multiple departments within. On top of the work required to participate in the workshop, the utilities also were required to submit a detailed workplan to Energy Safety, with only two weeks to create this comprehensive workplan while preparing presentations for the workshop. In light of the productive post-presentation discussions during the workshop, later working groups addressing risk modeling should be in the form of a discussions, without the need for additional detailed presentations and workplans that put additional strain on the staff. SDG&E asks Energy Safety to ensure that working group meetings facilitate discussion that can help utilities better improve their models by facilitating conversations that foster helpful insights and ideas.

SDG&E supports the workshops and working groups assembled by Energy Safety to promote continued coordination regarding risk modeling. SDG&E agrees with Energy Safety's proposed Risk Modeling Group meeting cadence of meeting every three weeks in 2021 and

meeting monthly in 2022, with February being skipped. However, SDG&E does want to reiterate that it has a limited number of staff working on all wildfire mitigation efforts. These new meetings will put an increased strain on this limited staff, especially during San Diego's peak wind and fire season. The same team that will support the risk modeling working sessions is also actively updating models and is on SDG&E's PSPS activation team, so availability to attend workshops throughout the 2021 fire season could be limited depending on weather conditions. The wildfire risk models are also continuously evolving and updated in real time. Staff is working to ensure that SDG&E's risk models are working properly and up to date. Adding this large time commitment of working group attendance in addition to follow-up tasks outside of the working sessions may diminish the team's ability to refine the existing models as necessary. Because of these reasons, SDG&E staff may not be able to have updated content or provide follow-up items for the following meeting, especially in 2021 when the meetings occur within three weeks of one another.

While SDG&E looks forward to the conversations among utilities that will be facilitated by Energy Safety in the working group, it is imperative that utilities have the opportunity to discuss and learn together about risk modeling before qualified parties weigh in on the models. SDG&E has concerns that qualified interested parties will be allowed to attend each of these working groups prior to the utilities understanding their respective approaches. The electrical corporations designing and implementing the models should have the opportunity to first discuss and learn together about risk modeling before the qualified parties provide additional input on the models. There are concerns that the working groups will not be as effective if other qualified parties are involved in each meeting, as models continue through the development and discussion process. Instead, SDG&E suggests that the qualified members join every other working group session, so in total one two-hour working group a month. This way the utilities have greater opportunity to create content that is discussed and reviewed before receiving additional qualified party input in response.

## **B. ENERGY SAFETY SHOULD ALLOW FOR AND FOSTER DIVERSITY OF UTILITY RISK MODELS**

The workshop facilitated conversation around the standardization of utility risk models. Risk modeling is different for each utility. The conversations surrounding the risk models of each of the participating utilities at the workshop displayed that a model best suited for one territory is not likely to be best for another. Risk models may maintain some of the same inputs, but each model from each utility should be looked at individually and not so quantifiably compared to one another. Modeling is also heavily dependent on the data maturity of the respective electrical corporation. That data also varies across each utility. Changes in data storage or data availability can make some model iterations impossible for one utility and possible for another. SDG&E suggests that Energy Safety be cautious of direct comparisons between utility models, and objects to universal standardization of risk modeling. Additionally, because standardization can potentially result in the selection of less mature frameworks that can work across various companies, it's important to ensure that the focus on standardization does not take away from the overall objective of innovation and continuous improvement. Flexibility is key to continuing risk modeling improvements and utilities should have the flexibility to explore new methodologies and

share learnings as they arise. This ongoing development best promotes continued improvements in risk modeling.

The updated proposed schedule for the working group states an end date on September 7, 2022, with the topic of “finalize risk modeling guide.” SDG&E wants to ensure that this finalization of a guide does not mean that utility models must be finalized, but instead that a finalized gathering of inputs are completed. SDG&E reiterates that utility risk models are always being updated and continually evolving, and guidance for these models should support the continual update and improvement of models. SDG&E recommends that the final guidance is not so specific or regimented so as to render it outdated soon after approval.

**C. SPECIFIC DETAIL REGARDING S-MAP SHOULD NOT BE APART OF RISK MODELING WORKSHOP DISCUSSIONS**

The various risk modeling workshops and efforts facilitated by Energy Safety and the California Public Utilities Commission should be complementary to each other, and certain topics should remain within the scope of the ongoing S-MAP proceeding at the Commission. Namely, the topic of Risk Spend Efficiencies and the use of Multi Attribute Value Frameworks should remain the province of the S-MAP proceeding because of the broad nature of these frameworks and their applicability to other risks and proceedings that go beyond wildfire safety and are outside the jurisdiction of Energy Safety. SDG&E is open to future discussions on S-MAP related issues and is willing to work with Energy Safety to define proper alignment with S-MAP detail and Energy Safety risk modeling actions.

**Conclusion**

SDG&E appreciates Energy Safety’s consideration of these comments on the Risk Modeling Workshop and requests that Energy Safety take these recommendations into account during the development of the risk modeling framework.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company