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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 Reply Comments on 2022 WMP Update Draft Guidelines
Docket 2022-WMPs**

Dear Director Thomas Jacobs:

SDG&E hereby provides reply comments in response to comments to the Draft 2022 Wildfire Mitigation Plan (WMP) Update Guidelines (Draft Guidelines) filed by San Diego Gas & Electric (SDG&E), Pacific Gas & Electric (PG&E), Southern California Edison (SCE), California Association of Small and Multi-Jurisdictional Utilities (CASMU), and Joint Stakeholders comments of Public Advocates Office (Cal Advocates), Mussey Grade Road Alliance (MGRA), and The Utility Reform Network (TURN) on December 2, 2021.

**A. SDG&E AGREES WITH JOINT STAKEHOLDER COMMENTS THAT
THERE SHOULD NOT BE OVERLAP BETWEEN WMP AND
QUARTERLY DATA REPORTS**

The Joint Stakeholder¹ comments urge Energy Safety to avoid establishing requirements that duplicate requirements of the Quarterly Data Reports (QDR).² The Draft Guidelines call for inclusion of information that is already in the geospatial requirements for the QDR, such as inclusion of maps on grid design and system hardening.³ SDG&E agrees with Joint Stakeholders that maps should only be required in the utilities' QDRs. The maps requested that are already provided in the QDR would be best served by the geospatial nature of the QDR instead of requiring these submissions as PDF files in the WMP update.

¹ Joint Stakeholder comments are joint comments from Cal Advocates, MGRA, and TURN.

² Joint Stakeholder comments, p 15.

³ Joint Stakeholder comments, p 15.

B. ENERGY SAFETY SHOULD NOT INCLUDE THE TIMING UPDATES SUGGESTED BY JOINT STAKEHOLDER COMMENTS

The Joint Stakeholders discussed their concerns with the draft schedule proposed by Energy Safety in the 2022 WMP Update Draft Guidelines, including Energy Safety's proposed reduction of stakeholder and public comment from a 52-day review period in 2021 to a 27-day review period in 2022.⁴ Comments argue that the proposed reduction in public comment period will not give stakeholders adequate time to review the WMP updates, and thus will reduce the meaningfulness of stakeholder comments.⁵ Joint Stakeholders thus urge Energy Safety to move the stakeholder comment deadline to later in the WMP review process, and provides five alternatives to mitigate their scheduling concern.⁶ First, SDG&E supports the review period as proposed by Energy Safety, as 27 days is sufficient for stakeholder input on the 2022 WMP Update. Second, the public comment period should align with and maintain the 90-day deadline for approval of utilities' WMPs established in the Public Utilities Code.⁷ SDG&E relies on receiving a timely approval of its WMP Update so that initiatives can be implemented in a timely manner. Consistent with the statute, there should be no delay to the existing WMP approval timeline. SDG&E requests that Energy Safety dismiss the suggested changes in updating stakeholder comment review period.

Joint Stakeholders also suggest that Energy Safety should "revert to the model used in 2021 with simultaneous issuance and review of WMPs."⁸ SDG&E finds this request misplaced. Energy Safety has already set the timeline for WMP update in the draft 2022 WMP guidelines, and SDG&E's WMP update is due Friday March 4, 2022.⁹ WMP update processes have already begun in internal business units in order to meet this established deadline. Revisiting this timeline would create unnecessary uncertainty which adds extreme difficulty to create internal timelines and deadlines. SDG&E suggests that Energy Safety maintain the due dates as proposed in the 2022 WMP Update Draft Guidelines to allow utilities to appropriately plan their work, which involves multiple internal teams, for the WMP cycle.

Conclusion

SDG&E appreciates Energy Safety's consideration of these reply comments on the 2022 WMP Update Draft Guidelines and requests that Energy Safety take these recommendations into account in the Final Guidelines.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company

⁴ Joint Stakeholder comments, p 3.

⁵ Joint Stakeholder comments, p 3.

⁶ Joint Stakeholder comments, p. 9-13.

⁷ Public Utilities Code 8386.3(a).

⁸ Joint Stakeholder comments, p 13.

⁹ Energy Safety 2022 WMP Guidelines, Attachment 5, p. 7.