



February 16, 2022

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California Regulatory Affairs
San Diego Gas & Electric Company
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SUBJECT: SDG&E 2021 Q4 Quarterly Data Reports and 2022 Wildfire Mitigation Plan Data

Mr. Gill,

Pursuant to Energy Safety's Final 2022 Wildfire Mitigation Plan (WMP) Update Guidelines,¹ adopted on December 14, 2021,² utilities were required to submit their 2021 Fourth Quarter (Q4) Quarterly Data Reports (QDRs) by February 1, 2022. Attachment 1 of the 2022 WMP Guidelines provides a summary of key changes to the template, including four new guidelines related to non-spatial data reporting, which are reflected in the new non-spatial data template (Attachment 3) and are as follows:

- **New Guideline 2.3a:** Table 2 of Attachment 3 includes additional entries (rows) to delineate the outcome metrics data by HTFD tier and wind condition ("wind warning status") for risk events and utility-related ignitions.
- **New Guideline 2.3b:** Table 7.1 no longer includes ignition data, while Table 7.2 includes ignition data previously reported in Table 7.1.
- **New Guideline 2.3c:** Table 7.2 requires the utility to report on HTFD tier(s) and line type(s) in rows, allowing the use of Excel's filtering tool.
- **New Guideline 2.3d:** Table 12 reflects all mitigation initiatives including the new requirements in Section 7 of the 2022 Guidelines (e.g., new initiative No. 65 on post-fire vegetation management practices).

¹ Energy Safety's Final 2022 WMP Update Guidelines (accessed February 3, 2022):

<https://efiling.energysafety.ca.gov/efiling/Getfile.aspx?fileid=51912&shareable=true>.

² Energy Safety formally adopted the 2022 WMP Update Guidelines on December 14, 2021, during a public meeting held pursuant to Government Code 15475.6. The meeting agenda, slide deck, and a link to the video recording can be found here (accessed February 3, 2022): <https://energysafety.ca.gov/events-and-meetings/events/adoption-of-the-2022-wmp-update-guidelines/>.

The 2022 WMP Guidelines provide a schedule and instructions for QDR submissions (included in Attachment 5), which required that non-spatial data submissions were to follow the schema of *Attachment 3: 2022 Performance Metrics Data Templates*. Further, the final 2022 WMP Guidelines removed the requirement for utilities to submit updated data, including 2022 and 2023 projections, concurrent with submission of a WMP. Instead, Energy Safety intended that the 2021 Q4 QDR submission would include projections and would constitute the utilities' complete WMP data submissions for 2022.

San Diego Gas & Electric Company (SDG&E) timely submitted its 2021 Q4 QDR on February 1, 2022; however, it did not use the updated template required by Energy Safety for reporting its non-spatial data, nor did SDG&E include 2022 and 2023 projections. Upon discussion with SDG&E and other utilities, Energy Safety learned that all utilities, excluding Southern California Edison Company, failed to understand that 2021 Q4 QDR data should be submitted in the 2022 template. Further, the eight utilities required to submit WMPs believed that all projections and updated data would be submitted in a separate filing concurrent with the submission of each electrical corporation's WMP.

After discussion with SDG&E, Energy Safety agreed that SDG&E could submit updated 2021 Q4 QDR data in the 2022 non-spatial data reporting template, along with projections required for WMP evaluation, according to the schedule set forth below.

Table	Submission Date
Table 1	2/11/2022
Table 2	2/11/2022
Table 3	2/11/2022
Table 4	2/11/2022
Table 5	2/11/2022
Table 6	2/11/2022
Table 7.1	2/11/2022
Table 7.2	2/11/2022
Table 8	2/11/2022
Table 9	2/11/2022
Table 10	2/11/2022
Table 11	2/11/2022
Table 12	2/11/2022

Energy Safety appreciates SDG&E's cooperation and strict adherence to the timelines set forth above.

Sincerely,

Melissa Semcer

Melissa Semcer
Deputy Director, Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety