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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 to Energy Safety Draft Decision Approving SDG&E's
2022 WMP
Docket 2022-WMPs**

Dear Director Thomas Jacobs:

San Diego Gas and Electric Company (SDG&E) hereby provides reply comments to the Office of Energy Infrastructure Safety's (Energy Safety) Draft Decision approving SDG&E's 2022 WMP Update (Draft Decision) provided by The Public Advocates Office (Cal Advocates) and The Green Power Institute (GPI) on June 8, 2022. Failure of SDG&E to address any other issue in these reply comments does not indicate agreement or waiver.

I. SUMMARY OF COMMENTS AND GENERAL RECOMMENDATIONS

On May 19, Energy Safety issued its draft decision approving SDG&E's 2022 wildfire mitigation plan submission. Again, SDG&E would like to reiterate its appreciation to Energy Safety's thoughtful review of SDG&E's 2022 WMP Update, and intervenors thoughtful review of the draft decision. SDG&E asks that Energy Safety reject the suggestions by Cal Advocates on the basis that including these recommendations into the final decision on SDG&E's 2022 WMP will be redundant.

II. RESPONSE TO COMMENTS OF THE PUBLIC ADVOCATES OFFICE (CAL ADVOCATES) ON ENERGY SAFETY'S DRAFT DECISION APPROVING SDG&E'S WMP

a. SDG&E's 2022 System Hardening Goals are Realistic and Achievable, and No Additional Reporting Is Necessary

Cal Advocates' recommendations regarding SDG&E's staffing and resources for 2022 system hardening goals and additional related reporting, including the submission of a "detailed workplan" by which SDG&E would "explain how it plans to optimize and reallocate its resources to complete its covered conductor and undergrounding goals" are unnecessary and

overly burdensome. SDG&E's 2022 WMP goals are the product of forecasting and planning by its subject matter experts, and meeting those goals is a company objective. As SDG&E's covered conductor and undergrounding mileage for 2022 were scoped and planned in advance of this year, SDG&E has worked to anticipate and forecast feasible and realistic goals as described in its 2022 WMP Update. This includes a large reallocation of resources from traditional bare hardening efforts to covered conductor and undergrounding for 2022—as noted in Energy Safety's approval of SDG&E's 2022 WMP Update.¹

As with any construction project, SDG&E anticipates that it will encounter foreseeable obstacles or setbacks. SDG&E's planned increase in workload is feasible with respect to areas within its control. Certain obstacles can lead to unforeseen delays, including but not limited to delayed permits and long permit review times, supply chain disruptions, COVID-19 impacts, and construction difficulties caused by terrain that could impact system hardening goals. SDG&E's subject matter experts strive to anticipate some issues and keep potential setbacks in mind when forecasting goals. But creating a “detailed workplan” to provide additional insight on system hardening resources and goals is unnecessary given the clear goals in SDG&E's WMP. Moreover, the work of preparing this workplan is burdensome on the very SDG&E resources that should be devoting their time to completing planned hardening projects. Distracting resources from the ultimate goal of system hardening as San Diego's peak wildfire season approaches deters from the shared goal of continued wildfire mitigation.

Furthermore, SDG&E continues to monitor and report its quarterly progress on all WMP initiatives as required by Energy Safety through the Quarterly Initiative Update and Quarterly Data Report. To the extent Cal Advocates is seeking additional reporting, such a request is again unduly burdensome and redundant. If SDG&E experiences significant delays or setbacks in its system hardening—or any WMP—initiatives, it will inform Energy Safety and stakeholders through the existing reporting, including preparing a change order if necessary.

b. It is Unnecessary to Provide Additional Explanation or Breakdown Regarding the Use of In-House or Contract Vegetation Management Labor

Despite a significant uptick in the demand for vegetation management labor throughout the state, SDG&E has not experienced a significant human resource issue for vegetation management due to its split of in-house versus contract labor. Public Utilities Code Section 8386 requires that the electrical corporations provide “plans for vegetation management” in their respective WMPs, but there is no requirement that those plans include labor descriptions and the WMPs should not be made a venue by which the merits of in-house versus contractor labor should be debated.² SDG&E's vegetation management program—which covers SDG&E's entire service territory—is continually focused on meeting its annual inspection and trimming goals, complying with applicable regulatory requirements, and mitigating the threat of wildfires caused by tree-line contacts. And SDG&E's subject matter experts are in the best position to determine

¹ Draft Decision p. 43.

² See, Public Advocate Office's Comments at 6 (“Understanding how utilities are using contract and in-house labor will enable intervenors to assess the strengths and weaknesses of vegetation management programs, as well as better understand how SDG&E's vegetation management programs operate and identify which type of labor is most appropriate for each individual program.”)

the type of labor most appropriate to achieve those goals and to do so at the best value for its ratepayers.

With respect to shifts in its vegetation management labor to support the WMP, SDG&E hired four in-house patrollers in early 2021 to augment its off-cycle HFTD inspection activities. The off-cycle activity is an additional inspection performed within the HFTD annually. The SDG&E patrollers are International Society of Arboriculture (ISA) Certified Arborists and specifically trained in hazard tree assessment. The routine pre-inspection activity within the HFTD is performed by contract labor (“pre-inspectors”) in conjunction with the annual schedule. As with the SDG&E patrollers, the contracted pre-inspectors who perform the routine HFTD inspection activity are ISA Certified Arborists.

A comparison of in-house versus contract labor across the utilities seems to be of questionable value provided the electrical corporations are achieving their vegetation management goals and achieving the necessary level of wildfire risk mitigation. With that said SDG&E looks forward to its continued collaboration with the other electrical corporations on matters related to vegetation management both through the formal working group facilitated by Energy Safety and via informal discussions.

c. An Additional Working Group Dedicated to Fast Recloser Settings Would Unnecessarily Burden Resources, But SDG&E Can Provide Additional Reporting on Fast Recloser Use

SDG&E’s System Protection Engineering already collaborates with the three joint California IOUs on a regular basis to discuss best practices around protection settings and technologies, including sensitive (fast) protection settings used for wildfire mitigation. Nevada Energy also participates on this call and others may join as this group continues to engage with the industry regarding system protection for wildfire mitigation. Further the utilities have also had a number of other joint meetings to discuss this topic to better understand one another’s practices, including an in-person meeting already held this year at PG&E’s San Ramon Facility.

Given the existing collaborative efforts, there is no need to change the cadence of these meetings or add additional requirements. Additionally, as stated in SDG&E’s Opening Comments on the Draft 2022 WMP Approval, an extra working group would strain resources that are already spread thin and would not add value since the goals of this recommendation are already accomplished via the cross-collaboration described above.

SDG&E has been tracking operations driven by sensitive settings over the years and going forward can supply information on operations when sensitive settings are activated.

d. Additional Modeling and Reporting Requirements Beyond Those Included in the Draft Decision Are Unnecessary at This Time

In approving SDG&E’s 2022 WMP Update, Energy Safety noted that an area of significant progress was that SDG&E has improved its PSPS modeling capabilities with the development of the WiNGS-Ops to scope and forecast PSPS events.³ SDG&E believes that risk modeling and assessment should be an iterative and evolutionary process that fosters the use of additional

³ Draft Decision at 2.

information where available. The improvements in SDG&E's modeling capabilities are the product of that process and represent continual efforts to improve both data and modeling capabilities. The additional risk-related reporting in Directive SDGE-22-31 requires SDG&E to continue to report on progress regarding modeling PSPS risks and its WiNGS-Ops model. This reporting requirement captures the nature of ongoing improvements to risk modeling and should not be revised to include Cal Advocates' additional recommendations.

Within the 2022 WMP Update, section 4.5.1.7, WiNGS-planning,⁴ documents the sensitivity analysis that is used to validate the risk spend efficiencies (RSE), which ensures that recommended mitigations are accurate and adaptable to changing economic conditions. This section details the validation steps employed for quality checking the input, aggregation, and output in the WiNGS-planning model. In addition to the model validation details in section 4.5.1.7, it is noteworthy to emphasize that functions are being developed to validate various steps of the modeling process in the Python conversion process, which will result in the automation of much of the quality control effort. The validation functions will compare current variable values against prior model runs at various stages in the model and generate reports on discrepancies.

To the extent Energy Safety wishes to make additional modeling recommendations regarding sensitivity analyses and validation methods, those are best discussed by leveraging the ongoing risk modeling working groups and the ongoing development of the 2023 WMP Guidelines.

III. CONCLUSION

SDG&E appreciates Energy Safety's consideration of these reply comments on Energy Safety's draft decision approving SDG&E's 2022 WMP and requests that Energy Safety take these recommendations into account in the final decision.

Respectfully submitted,

/s/ Laura M. Fulton
Attorney for
San Diego Gas and Electric Company

⁴ SDG&E's 2022 WMP Update at 127.