



Laura M. Fulton
Senior Counsel
8330 Century Park Court, CP32F
San Diego, CA 92123-1548
LFulton@SDGE.com

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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 Draft 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey
Docket #2023-2025 WMPs**

Dear Director Thomas Jacobs:

SDG&E hereby provides comments regarding the Draft 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey, provided by the Office of Energy Infrastructure Safety (Energy Safety) on September 21, 2022.

A. SDG&E Requests an Update to Years Responded for in the Survey

The draft WMP maturity survey asks a very granular group of 1,175 questions for the 4-year timeline from 2023-2026. SDG&E asks that Energy Safety consider requiring responses to the maturity survey for the current year and for year that ends the WMP cycle, instead of requiring forward-looking granular responses for three additional years in between. Similar to the prior WMP cycle, this will provide the utilities the flexibility to mature across the different capabilities over the 3-year WMP cycle.

B. Extension for the Maturity Model Assessment Due Date

In Energy Safety's Draft 2023 Wildfire Mitigation Plan Schedule, it is determined that Energy Safety will distribute the maturity survey on December 16, 2022, and the maturity survey will be due on January 30, 2023.¹ SDG&E asks that Energy Safety provide within the final WMP schedule the date in which the final maturity survey guidelines will be released. The 2022 maturity survey was released by Energy Safety on December 15, 2021, and responses were requested by January 19, 2022. This timeframe allowed electrical corporations 35 days to complete the 247 question survey. For the 2023-2025 WMP, Energy Safety is asking that electrical corporations complete the 1,175 questions in only 45 days, only ten additional days to complete 928 additional

¹ Energy Safety Draft 2023 Wildfire Mitigation Plan Schedule at Attachment 1.

questions compared to 2022. Completing this survey with such a large quantity of questions in such a short timeframe will be difficult for SDG&E to accomplish. Instead, SDG&E asks that Energy Safety extend the timeline in final guidelines and ask for submissions of the maturity survey to be due on March 27, 2023, the same day that the 2023-2025 Large IOU submissions will be due. This would allow electrical corporations a total of 101 days to complete the maturity survey.

This requested additional time is very essential to review the survey, interpret all the questions, respond the questions accurately by gaining alignment across multiple subject matter experts and leadership, and allowing for time to coordinate and benchmark with other IOUs.

C. Additional Documentation to Utilities Requested

SDG&E respectfully requests that in the final 2023-2025 Maturity Survey, Energy Safety provide the survey in an ADA compliant Word or Excel template. Additionally, SDG&E requests a copy of any redlined changes from the draft survey. Additionally, SDG&E requests that Energy Safety provide a template where electrical corporations can select a response for each question and it will populate and calculate maturity levels at the question and scoring philosophy level. This will allow utilities to focus on responding the survey questions and save significant time building a template to score every question and scoring philosophy. By Energy Safety providing these requested documents, it will significantly cut down the time required from the utilities to look for changes and transfer this information into an editable template.

D. Energy Safety Should Reduce the Number of Questions Asked to Minimize Redundancies

SDG&E requests that Energy Safety consider reducing the number of questions in the maturity survey. Currently, there are 1,175 questions in this new cycle of the WMP maturity survey, and much of the information being asked in the survey is already being provided within the WMP narrative. Additionally, some questions in the survey are repetitive. For example, in the question shown below, a selection of maturity level is being asked from the other capabilities that will be answered separately in addition to this question.

Spatial Granularity	1.4.6.Q1	<p>Spatial granularity requirements for model inputs, outputs, calculation steps, and validation basis meet, at a minimum, what maturity level for each of the following capabilities?</p> <ol style="list-style-type: none"> 1. Statistical Weather, Climate, and Fire Modeling 2. Estimation of Wildfire and PSPS Hazard and Exposure 3. Estimation of Community Vulnerability to Wildfire and PSPS 4. Ignition Likelihood Estimation 5. Weather Forecasting Ability 6. Wildfire Forecasting Ability <p>Level 0 or 1 (1); Level 2 (2); Level 3 (3); Level 4 (4)</p>
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E. SDG&E Requests for Clarifications

Throughout the maturity model document, the terms “ignition,” “fire,” “wildfire,” and “catastrophic fire” are used interchangeably.² SDG&E respectfully requests that Energy Safety clarify terms that can have overlapping meanings.

Additionally, SDG&E asks that in the final guidelines, Energy Safety provide clarifications on inconsistencies and mistakes that SDG&E has found on the numbering of questions, scoring philosophies and categories. These clarifications that are requested can be found in Appendix A.

F. Future Alignment on the Scoring Methodology Should be Considered by Energy Safety

After the WMPs for the Large IOUs are filed, SDG&E would like to continue to collaborate with the other Large IOU’s to review the existing scoring methodology of the maturity model. This review would include the existing criteria for what is assumed to be the “industry standard” as well as a feasibility assessment for implementing an improvement in order to achieve a higher score. This feasibility assessment would include additional costs, personnel, equipment, and other factors which might limit the utility’s ability to improve to the next maturity level as it exists today. SDG&E plans to continue to work with the Large IOUs and Energy Safety alike to continue to provide feedback on how to determine the “industry standard.”

G. Request for Utilizing Average Scoring Versus Lowest Scoring at Capability Level

SDG&E requests that the maturity level determination for each capability be made by averaging all the scoring philosophies within that capability instead of using the minimum of all scoring philosophies for one capability.³ This would allow the electrical corporations to get credit of the criteria that’s met within that scoring philosophy.

H. Request for Utilizing Average Scoring Versus multiple scoring schemes at Scoring Philosophy Level

SDG&E requests that the maturity level determination for each scoring philosophy be made by averaging or aggregating all the questions within that scoring philosophy instead of using multiple scoring schemes one scoring philosophy. This would allow the electrical corporations to eliminate error likely situation and complexity of scoring each of the 196 philosophies. For example, in Scoring Philosophy 1.1.2 there are 2 subsections, and each subsection is scored independently, and the maturity score for the scoring philosophy is the minimum of the subsection score. Maturity in subsection 1 utilizes ‘Ascending’ approach

² 2023 WMP Maturity Survey at p.408-415.

³ Energy Safety Draft Maturity Survey at p. 1.

whereas subsection 2 utilizes 'Tiered response' approach and the maturity level for the scoring philosophy is the minimum of the subsection (1 and 2) score.

Conclusion

SDG&E appreciates Energy Safety's consideration of these comments on the Draft 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey, and requests that Energy Safety take these recommendations into account in the final survey.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company

Appendix A

I. Capability 1:

1. Page 10: Scoring Philosophy 1.1.3, Learning and continuous improvement is numbered incorrectly. The correct number should be 1.1.4
 - a. All questions (1 through 4) within this scoring philosophy should be corrected to refer to scoring philosophy 1.1.4
2. Page 11: Scoring Philosophy 1.1.4, is numbered incorrectly. The correct number should be 1.1.5
 - a. All questions (1 through 10) within this scoring philosophy should be corrected to refer to scoring philosophy 1.1.5
3. Page 14: Scoring Philosophy 1.1.5, Spatial granularity is numbered incorrectly. The correct number should be 1.1.6
 - a. All questions (1 through 3) within this scoring philosophy should be corrected to refer to scoring philosophy 1.1.6
4. Page 15: Scoring Philosophy 1.1.6, Stability of assumptions is numbered incorrectly. The correct number should be 1.1.7
 - a. All questions (1 through 10) within this scoring philosophy should be corrected to refer to scoring philosophy 1.1.7
5. Page 18: Scoring Philosophy 1.1.7, Transparency is numbered incorrectly. The correct number should be 1.1.8
 - a. All questions (1 through 6) within this scoring philosophy should be corrected to refer to scoring philosophy 1.1.8
6. Page 20: Scoring Philosophy 1.1.8, Validation is numbered incorrectly. The correct number should be 1.1.9
 - a. All questions (1 through 8) within this scoring philosophy should be corrected to refer to scoring philosophy 1.1.9
7. Page 23: Scoring Philosophy 1.1.9, Validation, documentation, and disclosures is numbered incorrectly. The correct number should be 1.1.10
 - a. All questions (1 through 9) within this scoring philosophy should be corrected to refer to scoring philosophy 1.1.10
8. Page 27: 'Capability scoring table 1.1.10' is numbered incorrectly. The correct number should be 1.1.11
9. Page 27: Scoring philosophy 'QA / QC' shown in the capability scoring table is incorrect. Based on the questions starting on page 7, the correct scoring philosophy is 'Modularization'.

II. Capability 2:

10. Page 29: Scoring Philosophy 1.2.10, Comprehensiveness is numbered incorrectly. The correct number should be 1.2.2
 - a. All questions (1 through 14) within this scoring philosophy should be corrected to refer to scoring philosophy 1.2.2
11. Page 33: Scoring Philosophy 1.2.2, IT infrastructure and database management is numbered incorrectly. The correct number should be 1.2.3

- a. All questions (1 through 5) within this scoring philosophy should be corrected to refer to scoring philosophy 1.2.3
- 12. Page 35: Scoring Philosophy 1.2.3, QA / QC is numbered incorrectly. The correct number should be 1.2.4
 - a. All questions (1 through 3) within this scoring philosophy should be corrected to refer to scoring philosophy 1.2.4
- 13. Page 36: Scoring Philosophy 1.2.4, Spatial granularity is numbered incorrectly. The correct number should be 1.2.5
 - a. All questions (1) within this scoring philosophy should be corrected to refer to scoring philosophy 1.2.5
- 14. Page 37: Scoring Philosophy 1.2.5, Stability of assumptions is numbered incorrectly. The correct number should be 1.2.6
 - a. All questions (1 through 10) within this scoring philosophy should be corrected to refer to scoring philosophy 1.2.6
- 15. Page 40: Scoring Philosophy 1.2.6, Transparency is numbered incorrectly. The correct number should be 1.2.7
 - a. All questions (1 through 6) within this scoring philosophy should be corrected to refer to scoring philosophy 1.2.7
- 16. Page 41: Scoring Philosophy 1.2.7, Validation is numbered incorrectly. The correct number should be 1.2.8
 - a. All questions (1 through 10) within this scoring philosophy should be corrected to refer to scoring philosophy 1.2.8
- 17. Page 46: 'Capability scoring table 1.2.8' is numbered incorrectly. The correct number should be 1.2.9

III. Capability 3

- 18. Page 61: Question 1.3.8.Q8 does not state a question but provides a scoring scheme for the subsection. Reference to question number should be removed.

IV. Capability 4

- 19. Page 77: Scoring Philosophy 1.4.5, Spatial granularity is numbered incorrectly. The correct number should be 1.4.6
 - a. All question(s) (1) within this scoring philosophy should be corrected to refer to scoring philosophy 1.4.6
- 20. Page 78: Scoring Philosophy 1.4.6, Stability of assumptions is numbered incorrectly. The correct number should be 1.4.7
 - a. All question(s) (1 through 10) within this scoring philosophy should be corrected to refer to scoring philosophy 1.4.7
- 21. Page 81: Scoring Philosophy 1.4.7, Transparency is numbered incorrectly. The correct number should be 1.4.8
 - a. All question(s) (1 through 6) within this scoring philosophy should be corrected to refer to scoring philosophy 1.4.8
- 22. Page 83: Scoring Philosophy 1.4.8, 'Validation' is numbered incorrectly. The correct number should be 1.4.9
 - a. All question(s) (1 through 10) within this scoring philosophy should be corrected to refer to scoring philosophy 1.4.9

23. Page 86: Scoring Philosophy 1.4.9, ‘Validation and documentation and disclosures’ is numbered incorrectly. The correct number should be 1.4.10
- a. All question(s) (1 through 10) within this scoring philosophy should be corrected to refer to scoring philosophy 1.4.10
24. Page 68: Question 1.4.9.Q8 does not state a question but provides a scoring scheme for the subsection. Reference to question number should be removed.
25. Page 90: ‘Capability scoring table 1.4.10’ is numbered incorrectly. The correct number should be 1.4.11
26. Page 90: Scoring philosophy ‘QA / QC’ shown in the capability scoring table is incorrect. Based on the questions starting on page 73, the correct scoring philosophy is ‘Modularization’.

V. Capability 6

27. Page 105: Question 1.6.2.Q8 does not state a question but provides a scoring scheme for the subsection. Reference to question number should be removed.
28. Page 116: Question 1.6.8.Q8 does not state a question but provides a scoring scheme for the subsection. Reference to question number should be removed.

VI. Capability 7

29. Page 143: Question 2.1.10.Q8 does not state a question but provides a scoring scheme for the subsection. Reference to question number should be removed.
30. Page 145: Scoring philosophy ‘QA / QC’ shown in the capability scoring table is incorrect. Based on the questions starting on page 130, the correct scoring philosophy is ‘Modularization’. Additionally, questions for scoring philosophy QA/QC is missing in the survey.

VII. Capability 8

31. Page 174: Scoring philosophy ‘QA / QC’ shown in the capability scoring table 2.2.12 is incorrect. Based on the questions starting on page 156, the correct scoring philosophy is ‘Modularization’.

VIII. Capability 9

32. Page 197: Question 2.3.9.Q8 does not state a question but provides a scoring scheme for the subsection. Reference to question number should be removed.
33. Page 200: Scoring philosophy ‘QA / QC’ shown in the capability scoring table 2.3.10 is incorrect. Based on the questions starting on page 186, the correct scoring philosophy is ‘Modularization’. Additionally, questions for scoring philosophy QA/QC is missing in the survey.

IX. Capability 12

34. Page 228: IN Question 2.6.5.Q5, provide guidance for response ‘yes, contracts.’ If the response is ‘yes’ or ‘no’ only, please fix the error to remove the word ‘contract’ in the ‘yes’ response.

X. Capability 15

35. Page 250: Scoring Philosophy 3.2.1, 'Frequency' is numbered incorrectly. The correct number should be 3.3.1
- a. All question(s) (1 through 7) within this scoring philosophy should be corrected to refer to scoring philosophy 3.3.1
36. Page 251: Question 3.2.1.Q7 does not state a question but provides a scoring scheme for the subsection. Reference to question number should be removed.
37. Page 252: Scoring Philosophy 3.2.1, 'Level of sophistication' is numbered incorrectly. The correct number should be 3.3.2
- a. All question(s) (1 through 6) within this scoring philosophy should be corrected to refer to scoring philosophy 3.3.2
38. Page 254: Scoring Philosophy 3.2.2, 'QA/QC' is numbered incorrectly. The correct number should be 3.3.3
- a. All question(s) (1 through 6) within this scoring philosophy should be corrected to refer to scoring philosophy 3.3.3
39. Page 256: Scoring Philosophy 3.2.1, 'Risk Spend Efficiency' is numbered incorrectly. The correct number should be 3.3.4
- a. All question(s) (1 through 6) within this scoring philosophy should be corrected to refer to scoring philosophy 3.3.4
40. Page 259: 'Capability scoring table 3.2.4' is numbered incorrectly. The correct number should be 3.3.5

XI. Capability 16

41. Page 260: 'Capability 16' section 3.3 is numbered incorrectly. The correct number should be 3.4
42. Page 260: Scoring Philosophy 3.3.1, 'Frequency' is numbered incorrectly. The correct number should be 3.4.1
- a. All question(s) (1 through 2) within this scoring philosophy should be corrected to refer to scoring philosophy 3.4.1
43. Page 261: Scoring Philosophy 3.3.2, 'Learning and continuous improvement' is numbered incorrectly. The correct number should be 3.4.2
- a. All question(s) (1 through 9) within this scoring philosophy should be corrected to refer to scoring philosophy 3.4.2
44. Page 264: Scoring Philosophy 3.3.3, 'Level of sophistication is numbered incorrectly. The correct number should be 3.4.3
- a. All question(s) (1 through 6) within this scoring philosophy should be corrected to refer to scoring philosophy 3.4.3
45. Page 266: Scoring Philosophy 3.3.4, 'Risk spend efficiency (RSE) is numbered incorrectly. The correct number should be 3.4.4
- a. All question(s) (1 through 5) within this scoring philosophy should be corrected to refer to scoring philosophy 3.4.4
46. Page 268: Scoring Philosophy 3.3.5, 'Spatial granularity' is numbered incorrectly. The correct number should be 3.4.5
- a. All question(s) (1 through 6) within this scoring philosophy should be corrected to refer to scoring philosophy 3.4.5
47. Page 270: Scoring Philosophy 3.3.6, 'Subject matter expert (SME) verification' is numbered incorrectly. The correct number should be 3.4.6

- a. All question(s) (1 through 9) within this scoring philosophy should be corrected to refer to scoring philosophy 3.4.6

48. Page 274: Capability scoring table 3.3.7' is numbered incorrectly. The correct number should be 3.4.7

XII. Capability 17

49. Page 275: 'Capability 17' section 3.4 is numbered incorrectly. The correct number should be 3.5

50. Page 275: Scoring Philosophy 3.4.1, 'Documentation and disclosures' is numbered incorrectly. The correct number should be 3.5.1

- a. All question(s) (1 through 5) within this scoring philosophy should be corrected to refer to scoring philosophy 3.5.1

51. Page 277: Scoring Philosophy 3.4.2, 'Frequency' is numbered incorrectly. The correct number should be 3.5.2

- a. All question(s) (1 through 4) within this scoring philosophy should be corrected to refer to scoring philosophy 3.5.2

52. Page 278: Scoring Philosophy 3.4.3, 'Level of sophistication' is numbered incorrectly. The correct number should be 3.5.3

- a. All question(s) (1 through 7) within this scoring philosophy should be corrected to refer to scoring philosophy 3.5.3

53. Page 281: Scoring Philosophy 3.4.4, 'QA/QC' is numbered incorrectly. The correct number should be 3.5.4

- a. All question(s) (1 through 11) within this scoring philosophy should be corrected to refer to scoring philosophy 3.5.4

54. Page 284: Capability scoring table 3.3.7' is numbered incorrectly. The correct number should be 3.5.5

55. Page 285: 'Category scoring table 3.5' is numbered incorrectly. The correct number should be 3.6

XIII. Capability 26

56. Page 367: In 'Capability scoring table 5.54', there are 4 scoring philosophies listed however, the questions provided in the survey are only for 3 scoring philosophies. Please either remove scoring philosophy 'Learning and Improvement' or provide questions related to it.