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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 Data Guidelines
Docket #Data Guidelines**

Dear Director Thomas Jacobs:

SDG&E hereby provides comments regarding the Draft Data Guidelines (Guidelines), provided by the Office of Energy Infrastructure Safety (Energy Safety) on October 14, 2022.

A. Implementation of the Data Reporting Structures Should be Aligned for Consistency

SDG&E has concerns on the timing requirements within these guidelines, which state that reporting standards within the guidelines will become effective in the fourth quarter of 2022 for wildfire mitigation data, and first quarter 2023 for GIS data.¹ The non-spatial wildfire mitigation data tables have many dependencies on the spatial GIS data and utilize the same automated querying capabilities. To implement the non-spatial wildfire mitigation data tables requires a concurrent implementation with the spatial GIS data. As stakeholders and Energy Safety noted in the public workshop held on November 17, 2022 enhancements and changes made to the GIS data schema is time consuming and unreasonable to implement prior to early 2023. Therefore, SDG&E asks that the implementation of both reporting structures be aligned and effective in first quarter 2023.

The Guidelines state that when an electrical corporation corrects/revises previously submitted actuals or targets, the electrical corporation must submit the corrected data in a separate file.² SDG&E asks that Energy Safety provide an acceptable variance for revision submittals. As the year progresses, cumulative year-to-date progress reported in Table 1 (QIU) will likely not align with the summation of quarterly progress on initiatives due to normal business operations and the timing of completions being recorded in the system(s) of record. The requirement to submit

¹ Energy Safety Draft Data Guidelines at p. 1.

² Energy Safety Draft Data Guidelines Section 2.4.1 at p. 6.

revisions to previously reported actuals would be overly burdensome and confusing due to the rolling nature of incoming completions.

B. The Process Should Allow Clarity When Changes are Incorporated

SDG&E asks that Energy Safety provide all components of the QDR when releasing a new version of the guidelines in order to efficiently and accurately review and provide comprehensive feedback. The expectation is that the following are included: 1) the Data Guideline (pdf), 2) the entity-relationship diagram (ERD), 3) the Geodatabase (gdb) template, 4) the Tabular data template(s) and 5) the Change Log. The change log is helpful to direct attention to the areas that have changes as opposed to trying to find them. SDG&E has implemented a process to compare two versions of the geodatabase; however, the direction within each field, changes to intended domain values, and changes to process can be difficult to find when embedded within the pdf. SDG&E understands these components will be provided; however, it would be more beneficial to have all documentation available to assist with the analysis and thorough feedback.

C. The Following Clarifications Should be Added to the GIS Requirements

- a. SDG&E understands from Energy Safety's workshop that all domains were intentionally removed from the geodatabase. SDG&E feels the domains enforce consistency and alignment between common fields. SDG&E suggests having all possible values (domains) from each of the fields removed and put into an excel document that can be better utilized. This would help with data integrity and reduce data errors in the documentation. SDG&E asks Energy Safety to consider the impact of all changes to domain values, small changes I.e. change in case can be labor intensive.
- b. SDG&E asks Energy Safety to change the naming of all database objects and field names to uppercase for consistency. For example, the PSPSEvent objects recently changes from "PspS" to "PSPS" which can impact automation.
- c. SDG&E asks Energy Safety to consider revising the Status Report template and consolidating all tabs into a single tab. SDG&E has submitted this format in previous submissions where all datasets and feature classes are combined to allow for filtering by dataset, feature class, and/or field. This will allow for more sufficient analysis on common fields and alignment of interdependencies.
- d. SDG&E asks Energy Safety to consider removing the ChangeOrder fields from spatial GIS data. Instead, SDG&E asks that submitted change orders be reported in Table 1 (QIU) where targets and actuals are identified.
- e. SDG&E seeks further clarification and definition for the InitiativeAudit feature class. Does this feature class include internal, external, or both types of audits? In some cases, it's not feasible to associate an audit to a specific initiative. Does this feature class intend to capture the QA/QC activities for asset inspections, grid hardening, and vegetation management? (Section 3.7.5.6)

- f. SDG&E asks Energy Safety to review the following potential discrepancies or misalignment between the GIS and Tabular QDR's:
- i. RFWStatus and RFWDay seem to represent the same outcome. Inconsistency in the naming between UnplannedOutages and Ignition.
 - ii. Alignment between Tabular QDR Table 5 metric 5.a.[d/t].# and the GIS QDR. "Utility work / Operation" value is missing from the Cause field in Wire Down Event feature class - no domains provided to validate.
 - iii. Alignment between Tabular QDR Table 6 metric 5.a.[d/t].# and the GIS QDR. "Utility work / Operation" value is missing from the SuspectedInitiatingCause field in Ignition feature class - no domains provided to validate.
 - iv. Please confirm the correct section is referenced in the new ProgramName/InspectionProgramNames in the Initiative FeatureClasses. Looking at the WMP Guidelines this is likely meant to be section 8.1, 8.2 or 8.3
 - v. The WireDown feature class name in the fgdb template is not consistent with the other feature class names. i.e. Suffix is YYYY_X vs YYYY_QX
 - vi. There are some metrics in Tabular QDR Table 2 that are not consistently numbered. Metrics 16.b.#.X.# should likely be renamed to d to align with distribution metrics.
 - vii. InspectionType was previously in the Initiative Log tables. Most fields were moved over to the feature class; however, InspectionType was not added to the feature class and it is required to report by this field in the Tabular QDR Table #2 metrics 15-17. Was this fields intentionally not added to the feature class?

D. Wildfire Mitigation Data

SDG&E asks Energy Safety to consider consolidating Tables 1 and 12. Each of these tables include targets/projections and actuals, so consolidating them would reduce duplicative reporting. Additionally, SDG&E asks Energy Safety to further define "open work orders" for Table 13. Are "open work orders" defined as corrective work orders that result from inspection and are associated with findings presented in Table 2? Furthermore, SDG&E seeks clarification on the reporting frequency for Table 5. The guidelines state year and quarter are required (Section 4.3.5); however, the template includes only annual headers.

Conclusion

SDG&E appreciates Energy Safety's consideration of these comments on the Draft Data 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