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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 to Energy Safety's Draft 2020 Annual Report on Compliance for SDG&E's 2020 Wildfire Mitigation Plan
Docket #2020-ARC**

Dear Director Thomas Jacobs:

SDG&E hereby provides comments regarding the Draft 2020 Annual Report on Compliance (ARC) for San Diego Gas & Electric's (SDG&E) 2020 Wildfire Mitigation Plan (WMP), provided by the Office of Energy Infrastructure Safety (Energy Safety) on November 23, 2022.

A. INTRODUCTION

First and foremost, SDG&E appreciates and agrees with Energy Safety's final conclusion that "SDG&E substantially complied with its 2020 WMP during the compliance period."¹ As noted, SDG&E completed the "vast majority"² of its key 2020 WMP initiatives and successfully met its wildfire risk mitigation goals for the January 1 – December 31, 2020 compliance year. Given SDG&E's success in "executing an actionable and adaptive plan for wildfire risk mitigation," SDG&E is concerned regarding some of the language and findings in the ARC. Namely, SDG&E is concerned by the following trends that fall outside of a traditional compliance review:

- Energy Safety overly emphasized outcome metrics in assessing whether SDG&E achieved its WMP initiative targets. Given that 2020 was an early year of WMP implementation, use of outcome metrics was misplaced to measure WMP compliance and risked overreliance on circumstances outside of SDG&E's control, including a prolonged wind event.

¹ Office of Energy Infrastructure Safety Draft Annual Report on Compliance, San Diego Gas & Electric's 2020 Wildfire Mitigation Plan (Draft SDG&E ARC) (November 23, 2022) at 1.

² *Id.*

- Energy Safety assessed SDG&E’s risk reduction and deployment of mitigation efforts using a retrospective standard and risk understanding that was not in place when SDG&E scoped its wildfire hardening work included in the 2020 WMP. While SDG&E understands the desire and usefulness of assessing and enhancing the effectiveness of *future* WMPs, it is unreasonable to impute knowledge obtained after the fact when making a determination of whether an electrical corporation performed the actions and completed the initiatives described in its WMP.³

B. ENERGY SAFETY SHOULD NOT CONTINUE TO MONITOR SDG&E’S 2020 WMP IMPLEMENTATION

In its draft ARC, Energy Safety states, in regard to SDG&E’s system hardening, that “additional analysis is required to determine whether SDG&E is effectively prioritizing the deployment of its mitigation efforts in areas of highest risk. Energy Safety plans to monitor this issue and continue assessing SDG&E’s progress in this regard through the 2020-2022 plan cycle compliance reviews.”⁴

Energy Safety does not need to review past progress of SDG&E in order to appropriately assess SDG&E’s compliance efforts in 2020. As stated within the ARC, “Energy Safety finds that SDG&E substantially complied with its 2020 WMP during the compliance period, January 1 to December 31, 2020.”⁵ SDG&E does not find it necessary that Energy Safety spend any additional time in monitoring or assessing SDG&E’s compliance with effective prioritization of mitigation efforts in areas of highest risk. Energy Safety has already agreed that SDG&E substantially complied, as stated above and additionally stated in Joint IOU comments to SPD-7.⁶ SDG&E did its mitigation work in areas that Energy Safety agreed upon, and compliance with that standard should not be determined by metrics that were driven by a standard that did not exist at the time of implementation.

C. RISK ASSESSMENT OF SDG&E’S INFRASTRUCTURE

SDG&E disagrees with the approach taken to review where SDG&E’s completed work falls in relation to risk. Energy Safety is utilizing circuit risk scores created by the Wildfire Risk Reduction Model (WRRM) tool as of 2020. However, hardening work completed in 2020 was scoped 18-24 months prior to construction to allow for engineering, design, and construction. It would not be appropriate to compare risk scores that are generated in 2020 to work that was scoped for completion two years earlier. As discussed in SDG&E’s 2020 WMP, SDG&E’s hardening

³ See, e.g. Wildfire Safety Division Wildfire Mitigation Plan Compliance Process (WSD-012) at 7. (use of outcome metrics “will inform [Energy Safety’s] future evaluations – with the intent to drive electrical corporations future WMPs to prioritize efforts that most effectively mitigate wildfire risk.”)

⁴ Energy Safety ARC for SD&GE’s 2020 WMP at 67.

⁵ Energy Safety ARC for SD&GE’s 2020 WMP at p. 1.

⁶ Joint Comments of SCE, SDG&E, and PG&E on Draft Resolution SPD-7 at p. 5.

programs were scoped to, “target specific assets with the highest probability of failure in the areas with the greatest impact prioritized through the WRRM model.”⁷ The hardening was targeting the highest risk assets which included small pockets of the overall circuit. Reviewing this work which was targeting specific assets on a circuit and comparing to a circuit-wide risk score would not be appropriate. Additionally, as noted by Energy Safety in the ARC, SDG&E had been hardening its distribution infrastructure since approximately 2013 and had already completed approximately 600 miles of hardening. Without reviewing all the work completed by SDG&E over the timeframe the risk-prioritization of this one year can be taken out of context.

SDG&E also disagrees with the use of the circuit risk scores to review vegetation management work. SDG&E’s vegetation management initiatives do not use the WRRM tool to prioritize the work and using these scores to review where SDG&E’s vegetation management work was completed is not appropriate. SDG&E’s vegetation management program inspects every tree at least once in the service territory, and performs trimming or removal as needed based on those inspections. SDG&E’s 2020 WMP describes these programs and does not mention utilizing these risk scores to scope where the work will occur. Therefore, these scores should not be utilized to assess compliance with the 2020 WMP.

The method of creating risk bins found in “Table 9: Total Length (in miles) of All Risk Segments in Each Risk Segment Quintile” does not accurately represent the wildfire risk on the distribution system. The analysis completed by OEIS would infer that 20% of the top risk falls within 61 miles of the entire territory. That accounts for less than 1% of the total OH mileage in the entire territory. This method to bin by risk score misrepresents the wildfire risk and limits the ability to address risk. With the enhancement of risk modeling SDG&E created the WiNGS-Planning model to prioritize hardening efforts by wildfire risk. The implementation of WiNGS-Planning only began to influence the scope of work in 2022. SDG&E took a segment approach to executing mitigations and scoping the whole circuit segment, this technique not only addresses wildfire risk but reduces the impact of PSPS. To accurately identify areas for mitigation SDG&E creates bins by riskiest overhead circuit segment in HFTD and ranks these segments by top risk. This method shows the distribution of risk across the HFTD and allows for the deployment of mitigation in our high-risk areas. The influence of WiNGS-Planning on hardening efforts is evident in the figure below.

Riskiest Overhead Circuit Segments in HFTDs (Ranked by Decreasing Per-Segment Risk)	Total Distribution Circuit Miles Scoped for Hardening 2022 - 2024	Total Distribution Circuit Miles Scoped for Hardening 2025-2027
Top 10%	437.9	377.9
Top 20%	161.9	148.2
Top 30%	27.9	77.4

⁷ SDG&E 2020 Wildfire Mitigation Plan p.65

Top 40%	1.7	0.0
Top 50%	0.3	11.6
Top 60%	2.8	0.0
Top 70%	9.1	0.0
Top 80%	0.0	0.0
Top 90%	0.0	0.0
Top 100%	0.0	0.0
Total	641.6	615.1

D. NORMALIZATION OF DATA

SDG&E appreciates Energy Safety's analysis of risk and ignition trends provided in the ARC and agrees that normalization of the data is important. When looking at this data, even when normalized, it is also important to also consider the raw data. The ARC noted an increase in normalized wire down events and ignitions on its transmission infrastructure. It should be noted that the raw data for these events are very small, and any fluctuation can appear to be a large increase. For example, in 2020 SDG&E had one transmission wire down event, which equated to a 50% increase over the five-year average. SDG&E has only had three transmission wire down events since 2015 and thus any event can appear to have an outsized impact when normalized and compared to the average.

While normalization by red flag warning circuit mile days (RFWCMD) is a useful tool, it is also important to understand that it does not capture all drivers that could impact outcomes. The ARC notes that there is an increase in Tier 3 equipment/facility failures and ignitions in 2020 when normalized to RFWCMD. Red Flag Warnings are issued when there is a combination of warm temperatures, low humidity, and strong winds. This does not accurately capture drivers that are not wind related. For example, in 2020 SDG&E experienced significant heatwaves in August and September. The prolonged heat events drove higher loads across the system and contributed to equipment failures, especially transformers, which can contribute to increased ignitions. It is important to understand these types of events and their impact on outcomes when considering trends in the data.

Conclusion

SDG&E appreciates Energy Safety's consideration of these comments on the Draft 2020 ARC for SDG&E, and requests that Energy Safety take these recommendations into account in the Final ARC.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company