San Diego Gas & Electric Company's Quarterly Data Report on WMP Spatial and Non-Spatial Data (QDR)

February 1, 2023



Pursuant to the California Public Utilities Commission (Commission or CPUC) Resolution WSD-011, and Wildfire Safety Division's Compliance Operational Protocols, issued February 16, 2021, SDG&E hereby submits its Quarterly Data Report (QDR) for the period October 1, 2022 through December 31, 2022 (Q4). A copy of this report is being provided to the California Office of Energy Infrastructure Safety (OEIS) docket and the service list of Rulemaking (R.) 18-10-007.

Specifically, this QDR provides the following:

- Non-Spatial Data Tables in the format provided by OEIS ("2023-02-01_SDGE_2022_QDR Non-Spatial Data_R0.xlsx")
- A geodatabase file containing SDG&E's currently available WMP reportable data in the schema provided by WSD (confidential file "SDGE_2022_Q4.gdb.zip") based on version 2.2 of the OEIS GIS schema. SDG&E is also providing an accompanying confidentiality declaration.
- The QDR Status Report, which in accordance with previously provided guidance, is an excel spreadsheet "2022-02-01_SDGE_QDR Spatial Data Status Report_R0.xlsx" which provides line by line accounting of the data included within this QDR, as well as an explanation of data gaps and timelines for gathering data not currently included in the confidential geodatabase file.
- The "SDGE_InitiativePhotoLog_2022_Q4 Feature Class" contains an additional field called Hyperlink that contains a URL to the photos that relate to the compliance findings in the Asset Inspection Point for the DIAR Program. SDG&E will provide access to OEIS staff that will be reviewing the photos.

As directed by OEIS, SDG&E is submitting its complete QDR, including all confidential information and supporting declarations via SharePoint.¹ SDG&E also includes two appendices that explain updates to the data.

SDG&E's Quarterly Data Report: Non-Spatial

SDG&E has worked through the new information required within the non-spatial data tables and has some comments, explanations, and interpretations of the requested data to submit to Energy Safety to paint a full picture of the data provided. These items are grouped by table and discussed in further detail in this section.

Within Table 2, SDG&E has reported only the vegetation management and asset management open work orders and past due work orders located within the HFTD. SDG&E felt this was most appropriate given that the vast majority of wildfire risk within SDG&E's service territory lies within the HFTD> Additionally, SDG&E notes that vegetation management past due work orders are determined by SDG&E-defined priority levels and are not driven by state regulation. Asset management past due work orders exclude orders resulting from drone inspections because these inspections are not required per CPUC General Orders and are thus not assigned a due date. These drone inspections are, however, included in SDG&E's open work orders and processed according to priority level. In addition, open work orders assigned to third party communication infrastructure providers are also excluded from asset management past due work orders because these are not under the responsibility of SDG&E to complete.

¹ California Office of Energy Infrastructure Safety – Data Submission Procedures (July 27, 2021).

Tables 5 and 6 introduce new risk event and ignition drivers not previously reported. SDG&E is reporting on drivers that are internally categorized and defined as risk event drivers, and all other risk/ignition drivers will be included in "Other." There are several OEIS-defined risk/ignition event drivers that are *not* considered by SDG&E to be risk event drivers. A risk event, as defined by OEIS, is an event with a probability of ignition. SDG&E believes several of the provided risk event drivers do not pose a risk of ignition. These drivers are reported as blank in Table 5 and Table 6 and include the following:

- Fire a fire burning in the area does not carry the risk of an additional ignition from SDG&E infrastructure.
- Dig in a dig in to gas or electric infrastructure by definition must occur on undergrounded infrastructure. Underground infrastructure does not carry the risk of sparks or ignition from a contact that overhead infrastructure does.
- Government agency request a government agency request will typically occur when an unsafe condition is found, or a risk event has already occurred. SDG&E will then de-energize the affected portion of the system to make necessary repairs.
- Customer request a customer request will typically occur when an unsafe condition is found, or a risk event has already occurred. SDG&E will then de-energize the affected portion of the system to make necessary repairs.
- Emergency repairs emergency repairs occur after the risk event has taken place. SDG&E will then de-energize the affected portion of the system to make necessary repairs.

Table 6 no longer has a category for secondary ignitions. SDG&E believes that ignitions on secondary voltage level equipment should continue to be separated from ignitions on primary voltage distribution level equipment as these ignitions are used to inform different mitigations and the forecasting for these ignitions is done separately. SDG&E is currently reporting secondary ignitions as an additional metric in Table 3 and recommends these be split into their own category in Table 6.

Tables 7, 8, and 9 require reporting on net new, upgraded, and decommissioned electric infrastructure on a quarterly basis. Quarterly changes do not reflect work that is completed in the field due to timing of digitization in the source system. Large projects require true-up analysis before digitizing, which could take up to months to complete. Actual completion of work is reported in Table 1 and the spatial QDR. SDG&E recommends Tables 7, 8, and 9 be required annually, which will better reflect true net changes to electric infrastructure.

SDG&E is continuously reviewing and improving its logic for the automation of linear measurements and overlay calculations required in Table 7. In addition, these new requirements will be thoroughly reviewed to ensure alignment with SDG&E's internal GIS quarterly reporting. In particular, the review will include GIS functions that are utilized to select and manipulate linear geometry as conductor intersects various boundaries. Going forward, SDG&E plans to benchmark and standardize these reporting requirements, and as such, expects continuous improvements in Tables 7, 8, and 9 as well as in its internal GIS quarterly reporting.

Furthermore, SDG&E is not reporting historical (Q1 2022 – Q3 2022) numbers of residential, commercial, and AFN customers broken out by various geographical boundaries in Table 7 because the snapshot of historical data is not available. However, SDG&E is reporting current Q4 2022 data on customer types and will continue to report this data going forward.

Table 13 requires reporting of all transmission and distribution open work orders resulting from inspection. While SDG&E provides accurate data reflecting the open date and due date of all work orders, it is unable to provide the following data points at this time due to challenges with obtaining the data manually from various work management systems. These data points are utilized in SDG&E's process to manage work between multiple departments; thus this data resides in multiple systems. SDG&E is evaluating how the data can be more readily available and obtained for future QDR submissions. The inability to report on this data does not impact the remaining data reported.

- i. Date(s) the work order was reinspected or modified (if applicable)
- j. Due date of the work order after it was reinspected or modified (if applicable)
- k. Priority of the work order after it was reinspected or modified (if applicable)
- I. Reason for reinspection (if applicable)

Table 14 and 15 require SDG&E to report overall utility risk by region and top risk circuits/segments/spans, respectively. SDG&E is reporting only for distribution in the HFTD. Overall utility risk for transmission is not calculated at this time. Transmission infrastructure in the HFTD Tier 3 hardening is near complete and a high percentage of Tier 2 is hardened. Transmission performance metrics indicate that ignition rates are very low relative to distribution, thus SDG&E focuses its risk analysis on distribution infrastructure.

Additionally, *Wildfire Vulnerability* and *Vulnerability of Community to PSPS* is not reported at this time due to lack of external data regarding community vulnerabilities. However, SDG&E is evaluating how to best account for and calculate these metrics and a discussion of this information is included in SDG&E's 2023-2025 WMP, Section 6.7 Risk Assessment Improvement Plan.

SDG&E's Quarterly Data Report: Spatial

SDG&E has implemented several improvements to the logic that supports the data within the file geodatabase. The improvements include:

- Tabular automation of 10 Asset Inspection Programs
- Tabular automation of 4 Vegetation Management Programs
- Tabular automation of 6 Grid Hardening Programs
- Tabular automation of 1 Other Initiative Program
- Tabular automation of 12 out of 14 Asset Point/Line Feature Classes/Relate Tables utilizing SDG&E's central repository increasing the accuracy and attribute completeness of the schema requirements
- Tabular automation of 3 Feature Class in Other Required Data
- Tabular automation of 3 Risk Event Feature Classes

SDG&E's focus is on continuous improvement and therefore would like to highlight the areas that have been identified and will be a focus for future submissions:

• Completion of Circuit 176 for Vegetation LiDAR inspections was reported in Q2. While the vegetation clearance report was completed and finalized, SDG&E found minor issues with the processed LiDAR data and the data was reviewed and corrected in Q4. This mileage has been removed from the Q2 cumulative completions and is reported as completed in Q4.

- Completion of the Microgrid site Cameron Corners was reported as completed in Q1 in error. The correct Microgrid site that was completed in Q1 is Ramona. SDG&E is resubmitting its Q1 Grid Hardening Point and Log point to accurately reflect the completion of the Ramona Microgrid site.
- SUG has been reporting completed mileage including primary, secondary, and service miles installed. Q4 spatial data now captures the additional mileage of secondary and service that has been completed this quarter. Further alignment will be discussed around the approach to the reporting of OH and UG mileage.