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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: Submission of San Diego Gas & Electric Company's Final 2023-2025 Wildfire Mitigation Plan

Docket # 2023-2025-WMPs

Dear Director Thomas Jacobs:

It accord with the Office of Energy Infrastructure Safety ("Energy Safety") Determination of Completeness for San Diego Gas & Electric's (SDG&E) 2023-2025 Wildfire Mitigation Plan Pre-Submission, dated March 6, 2023, and Energy Safety's 2023-2025 WMP Wildfire Mitigation Plan Process and Evaluation Guidelines, SDG&E is submitting its final 2023-2025 Wildfire Mitigation Plan (WMP).

As directed by Energy Safety, SDG&E has revised its WMP pre-submission to satisfy the completeness check by including the completed information identified by Appendix A. SDG&E's efforts to address the areas identified as incomplete are described in Section I below. SDG&E's additional, non-substantive corrections to errors will be noted in its red-lined submission of its 2023-2025 WMP. SDG&E notes that in some instances it has also corrected minor typographical errors (*e.g.*, misspellings, punctuation errors) that may not necessarily be reflected in Appendix A but SDG&E does not consider a correction or change to its WMP. A redline version of SDG&E's original pre-submission noting all changes is available to Energy Safety upon request.

I. Incomplete Information Identified by Energy Safety in SDG&E’s 2023-2025 WMP Pre-Submission

Section of SDG&E’s WMP Pre-Submission	WMP pre-submission PDF page number	Information to Make Complete	SDG&E DRAFT Response
Utility Initiative Tracking IDs	Overall	<p>SDG&E does not adequately use initiative tracking IDs throughout its WMP. For example, in Table 8-72 “Emergency Preparedness Initiative Objectives (3-year plan),” SDG&E does not use tracking IDs to tie the objectives to initiatives: instead, it states “n/a” in the column “Applicable Initiative(s), Tracking ID(s),” as it does in Table 8-93 “Community Outreach and Engagement Initiative Objectives (3-year plan).”</p> <p>SDG&E must use initiative tracking IDs to tie objectives, targets, and narratives in Sections 8 and 9 to its WMP initiatives (e.g., inspections, emergency preparedness, etc.). Objectives, targets, activities, and programs may have the same initiative tracking ID if each is under the same “initiative.”</p> <p>SDG&E must use initiative tracking IDs consistently throughout all Energy Safety submissions (e.g., WMP, QDRs) to allow Energy Safety to track progress throughout an initiative’s lifecycle.</p>	<p>Added initiative tracking IDs for all programs, including Section 8.4 and Section 8.5.</p> <p>Added initiative tracking IDs to each program mention throughout the WMP.</p> <p>Initiative tracking IDs will be used consistently throughout all Energy Safety submissions to allow energy Safety to track progress throughout an initiative's lifecycle.</p>
6.1.1 Overview	82	This section is missing an overview of SDG&E’s PSPS process. The response to the prompt states that the process for calculating PSPS is always changing. This is not sufficiently detailed to address the requirement of a process overview. Please provide more information about SDG&E's Public Safety Power Shutoff (PSPS) process.	Added calculation formulas for Wildfire Risk and PSPS Risk. Referenced Section 6.2.1 where the explanation of the risk calculation process is described in detail for Wildfire and PSPS risk.
6.2 Risk Analysis Framework	89	This section is missing and must include a high-level narrative overview of SDG&E’s risk analysis framework.	Referenced Section 4.4 Risk Informed Framework which includes a high-level narrative overview of SDG&E's risk analysis framework.

6.6.1 Independent Review	118	<p>This section is missing an explanation for the following items: (1) independent review triggers, (2) additional review, (3) results, recommendations, and disposition, and (4) routine review schedule.</p> <p>Currently in this section SDG&E reviews its WiNGS planning and operation models and the results. This does not address the prompt, which asks for processes, procedures, protocols, and standard operating procedures (SOPs) for the 4 items above.</p> <p>SDG&E must fully respond to the prompt, including an explanation for the four items above. This can be addressed with a narrative explanation and supporting schematic.</p>	Documented independent review process in Section 6.6.1, including a schematic.
7.1.4.2 Mitigation Initiative Prioritization	138-139	<p>This section is missing a prioritized list of initiatives for specific geographical areas. It is also missing a breakdown of mitigation initiatives by geographic area. Currently there is discussion of two mitigations, covered conductor and undergrounding; however, there is no mention of mitigation initiatives classified by geographic area.</p> <p>SDG&E must include in this section a breakdown and prioritized list of initiatives by geographic area.</p>	Section 7.1.4.2 updated to include additional mitigation initiatives by geographic area.
8.1.2.10.1 SCADA Capacitors Maintenance and Replacement Program	200-202	SDG&E provides information on its SCADA Capacitors Maintenance and Replacement Program in Section 8.1.2.10.1 (PDF page 200) under Section 8.1.2.10 “Other Grid Topology Improvements to Minimize Risk of Ignitions.” SDG&E must move the information pertaining to this initiative to Section 8.1.4 “Equipment Maintenance and Repair” (PDF page 247).	WMP narrative moved from Section 8.1.2.10.1 to 8.1.4, as requested by OEIS.
8.1.2.10.2 Expulsion Fuse Replacement Program	202-204	SDG&E provides information on its Expulsion Fuse Replacement Program in Section 8.1.2.10.2 (PDF page 202) under Section 8.1.2.10 “Other Grid Topology Improvements to Minimize Risk of Ignitions.” SDG&E must move the information pertaining to this initiative to	WMP narrative moved from Section 8.1.2.10.2 to 8.1.4, as requested by OEIS.

		Section 8.1.4 “Equipment Maintenance and Repair” (PDF page 247).	
8.1.2.10.3 Hotline Clamp Replacement Program	204-205	SDG&E provides information on its Hotline Clamp Replacement Program in Section 8.1.2.10.3 (PDF page 204) under Section 8.1.2.10 “Other Grid Topology Improvements to Minimize Risk of Ignitions.” SDG&E must move the information pertaining to this initiative to Section 8.1.4 “Equipment Maintenance and Repair” (PDF page 247).	WMP narrative moved from Section 8.1.2.10.3 to 8.1.4, as requested by OEIS.
8.1.2.10.4 Lightning Arrestor Removal and Replacement	205-207	SDG&E provides information on its Lightning Arrestor Removal and Replacement in Section 8.1.2.10.4 (PDF page 205) under Section 8.1.2.10 “Other Grid Topology Improvements to Minimize Risk of Ignitions.” SDG&E must move the information pertaining to this initiative to Section 8.1.4 “Equipment Maintenance and Repair” (PDF page 247).	WMP narrative moved from Section 8.1.2.10.4 to 8.1.4, as requested by OEIS.
8.1.2.10.7 Wireless Fault Indicators (WFIs)	210-211	SDG&E provides information on its Wireless Fault Indicators initiative in Section 8.1.2.10.7 (PDF page 210) under Section 8.1.2.10 “Other Grid Topology Improvements to Minimize Risk of Ignitions.” SDG&E must move the information pertaining to this initiative to Section 8.3.3 “Grid Monitoring Systems” (PDF page 337) under 8.3 “Situational Awareness and Forecasting.”	WMP narrative moved from Section 8.1.2.10.7 (with edits) to 8.3.3, as requested by OEIS.
8.1.6 Quality Assurance and Quality Control: Qualifications of the auditors	257-259	Table 8-26 is missing auditor qualifications for each of the QA/QC programs. Please revise the table to provide auditor qualifications.	Table 8-26 (renamed OEIS Table 8-7) updated to include auditor qualifications.
8.2.3.1 Pole Clearing	303	SDG&E provides pole clearing-related information in Section 8.2.3 under the heading “Vegetation Management Fuels Activity Treatment” (PDF page 301). SDG&E must place all pole clearing-related information under Section 8.2.3.1 “Pole Clearing” (PDF page 303).	Pole clearing narrative moved from Section 8.2.3 (Vegetation Management Activity Treatment) to Section 8.2.3.1 (Pole Clearing).
8.2.3.7 Fire-Resilient Right-of-Ways	310	For the description of this initiative, SDG&E refers to Section 8.2.3 “Vegetation and Fuels Management,” the introductory section which includes	Fire-resilient right-of-way WMP narrative moved from 8.2.3 to 8.2.3.7 Fire-Resilient

		information related to this initiative under the headings “Land Services Vegetation Abatement” and “Fire Coordination Fuels Reduction MOU & Grant.” SDG&E must move the fire-resilient right-of-way- related information from these sections to Section 8.2.3.7 “Fire-Resilient Right-of-Ways.” SDG&E must also provide a tracking ID for this initiative.	Right-of-Ways and tracking IDs WMP.1327 and WMP.1328.
8.4.1.2 Targets	369	<p>SDG&E must identify objectives for the next 3- and 10-year periods, targets, and performance metrics related to the following emergency preparedness programmatic areas: wildfire and PSPS emergency preparedness plan; collaboration and coordination with public safety partners; public notification and communication strategy; preparedness and planning for service restoration; customer support in wildfire and PSPS emergencies; and learning after wildfire and PSPS events.</p> <p>After identifying targets related to these emergency preparedness programmatic areas, SDG&E must include all targets it will use to track progress from 2023 to 2025 on the above emergency preparedness programmatic areas in its Table 8-74 “Emergency Preparedness Initiative Targets by Year.”</p>	Objectives for the next 3- and 10-year periods, targets, and performance metrics identified and added to Table 8-74 (renamed OEIS Table 8-35) the table.
8.4.1.3 Performance Metrics Identified by the Electrical Corporation	370	In Table 8-75 “Emergency Preparedness Performance Metrics Results by Year,” SDG&E must include all metrics it will use to track progress from 2023 to 2025 on the abovementioned emergency preparedness programmatic areas.	Emergency Preparedness Performance Metrics added to Section 8.4.1.3.
8.4.3.1 Emergency Planning	396 (Table in full on 679)	<p>In Table 8-83 “State and Local Agency Collaboration(s),” SDG&E must submit required information it lists as “redacted” for each public safety partner under “Point of Contact and Information” (name, position, and email). SDG&E may submit this information confidentially.</p> <p>SDG&E must correct its Table 8-83, replacing the verbatim text from the</p>	Table 8-83 (renamed OEIS table 8-44) (in Appendix F) submitted confidentially to OEIS.

		2023-2025 WMP Technical Guidelines with SDG&E-specific information.	
8.4.3.2 Communication Strategy with Public Safety Partners	399 (Table in full on 681)	In Table 8-85 “High-Level Communication Protocols, Procedures, and Systems with Public Safety Partners,” SDG&E must submit the required information listed as “redacted” for each public safety partner under “Point of Contact and Information” (name, position, and email). SDG&E may submit this information confidentially.	Table 8-85 (renamed OEIS Table 8-46) (in Appendix F) submitted confidentially to OEIS.
8.5.1.2 Targets	421	<p>SDG&E must identify objectives for the next 3- and 10-year periods, targets, and performance metrics related to the following community outreach and engagement initiatives: public outreach and education awareness for wildfires, PSPS, outages from protective equipment and device settings, and vegetation management; public engagement in the WMP decision-making process; engagement with Access and Functional Needs (AFN) populations, local governments, and tribal communities; collaboration on local wildfire mitigation and planning; and best practice sharing with other electrical corporations from within and outside of California.</p> <p>After identifying targets related to these community outreach and engagement initiatives, SDG&E must include all targets it will use to track progress from 2023 to 2025 on these initiatives in its Tables 8-95 “Community Outreach and Engagement Initiative Targets by Year” and 8-96 “PSPS Outreach and Engagement Initiative Targets by Year.”</p>	Community Outreach and Engagement Targets added to Table 8-95 (renamed OEIS table 8-55).
8.5.1.3 Performance Metrics Identified by the Electrical Corporation	421	After identifying metrics related to the abovementioned community outreach and engagement initiatives, SDG&E must include all metrics it will use to track progress from 2023 to 2025 on these initiatives in its Table 8-97 “Community Outreach and Engagement Performance Metrics Results by Year.”	Community Outreach and Engagement Performance Metrics added to Section 8.5.1.3 Table 8-97 (renamed OEIS Table 8-57).

8.5.3.2 Summary of Key AFN Demographics	431-432	SDG&E must include “percentage of total customer base” in its summary of key AFN demographics.	Added AFN Plan as Appendix G. Key AFN demographics referenced on Page 8 Figure 2.
8.5.3.3 Evaluation of Challenges and Needs during a Wildfire or PSPS Event	432	SDG&E must describe the challenges and needs it has identified during a wildfire or PSPS event. If they are described in another document (e.g., “the AFN plan”) then that plan must either be appended or a link to the document must be included.	AFN Plan attached as Appendix G.
8.5.3.4 Plans to Address Needs of the AFN Customer Base	432	SDG&E must describe its plans to address the needs of its AFN customer base. If they are described in another document (e.g., “the AFN plan”) then that plan must either be appended or a link to the document must be included.	AFN Plan attached as Appendix G.
9.1.4 Targets	444	SDG&E must set targets specific to reducing scale, scope, and frequency of PSPS events and report them in Table 9-5 “PSPS Targets by Year.”	PSPS targets added to Section 9.1.4 (renamed OEIS Table 9-5) specific to reducing scale, scope, and frequency of PSPS events.

Conclusion

SDG&E appreciates Energy Safety’s review and feedback on its 2023-2025 WMP Pre-Submission.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company