



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 AND ELECTRONIC FILING

Caroline Thomas Jacobs
Director, Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

**RE: SDG&E Comments to Substantive Revision to 2023 Maturity Survey
Docket # 2023-2025-WMPs**

Dear Director Thomas Jacobs:

San Diego Gas & Electric (“SDG&E”) hereby provides comments to The Office of Energy Infrastructure Safety’s (“Energy Safety”) substantive revision to the 2023 Maturity Survey.

I. DISCUSSION

SDG&E welcomes the efforts and engagement of Energy Safety in pursuing advanced levels of maturity and the agency’s effort to continue to put California’s electrical infrastructure at the leading edge of wildfire science and mitigation. To that end, SDG&E also appreciates Energy Safety’s willingness to revise and improve the Maturity Survey, including the multiple drafts and willingness to re-evaluate means to assess wildfire mitigation maturity. SDG&E supports Energy Safety’s removal of the eighteen identified questions from the Maturity Survey. But SDG&E believes that Energy Safety should go further to improve the Maturity Survey questions and address the numerous questions that SDG&E has identified as needing clarification, removal, or improvement. Reassessing these questions with the input of the electrical corporations and stakeholders would facilitate significant improvements in the Maturity Survey to more accurately reflect the electrical corporations’ overall maturity levels in light of the past and planned wildfire mitigation efforts. Further, SDG&E believes Energy Safety should continue to reevaluate the maturity model in workshops and further comments to address areas of concern.

In the Maturity Survey response, SDG&E included additional issues regarding specific questions in the free-response boxes. While SDG&E understands that Energy Safety may not have anticipated as much discussion in the free-response boxes, SDG&E believes that it is important to promote a record to facilitate general understanding of SDG&E’s approach to the Maturity Survey and the Company’s responses. While it is not our intent to repeat those comments for each and every question in the Maturity Survey, SDG&E provides the below

comments as thematic concerns and recommends that Energy Safety implement process improvements to enhance the Maturity Survey process for future WMP Updates during the 2023-2025 WMP cycle. SDG&E remains open to discuss future changes to the maturity survey in working groups or information sharing to improve the process moving forward.

SDG&E's concerns with the 2023 survey fall into several areas, including:

- The use of binary questions makes it difficult to accurately assess the nuances and complexities of wildfire mitigation activities. Additionally, because binary questions are limiting by nature, at times they are not flexible enough to allow adaptation to the changing wildfire prevention landscape as well as the varying geography and climates of the state.
- While a data-driven approach is important to reflect wildfire maturity, some questions are overly granular, and given the restrictive scoring methodology, limit SDG&E's ability to accurately reflect its maturity in instances where SDG&E has achieved what might otherwise be full maturity.
- In a few instances, the model asks questions that combine maturity of multiple models. For example, sub-capability levels of two or three models together. This doesn't allow for a clear response as to the level of maturity reached by each model.
- Maturity levels are occasionally tied to implementation of measures that are impractical and where SDG&E believes the overall benefit and risk reduction of the action may be significantly outweighed by the cost to perform it. To reflect the need to balance wildfire mitigation and technological investment with affordability concerns, Energy Safety should consult with stakeholders and the electrical corporations in developing technological, situational awareness, and modeling goals that avoid diminishing returns for our customers.
- The model misinterprets existing legal, regulatory, and administrative requirements, which leads in certain instances to SDG&E showing no maturity when it is in fact meeting and exceeding regulatory requirements. In other instances, the model assumes the existence of requirements that are not in place or are not clear to the utilities.
- The model imposes responsibilities upon the electrical corporations that are outside of their control. For instance, SDG&E has a record for extensive and productive collaborations with its emergency response agencies, however the model seeks to impose upon SDG&E responsibility for fire and emergency response that are far better suited to state and local emergency responders and fire agencies given their breadth of scope and capabilities. In some cases, if SDG&E took on responsibility for actions and efforts described in the maturity model, it could potentially conflict with the responsibility of fire and first responder agencies, resulting in potential confusion and negative impacts during an emergency.

- While SDG&E welcomes the transparency and discussion facilitated by Energy Safety regarding risk modeling and emerging technologies and seeks to improve from that collaboration, it is also important that Energy Safety recognize the need for protections regarding intellectual property and proprietary information. Failure to reflect the protection of innovation and investment, including that of third parties, could inadvertently deter information sharing and enhancement.

Conclusion

SDG&E appreciates Energy Safety's consideration of these comments on the substantive revision to the 2023 Maturity Survey, and requests that Energy Safety take these recommendations into account to facilitate further improvements.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company