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**VIA ELECTRONIC FILING**

**Docket # 2023-WSRR**

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

**SDG&E Wildfire Safety Requirements Recommendations Comments**

Dear Director Thomas Jacobs:

San Diego Gas & Electric (“SDG&E”) hereby provides comments regarding the two-day virtual public workshop held on July 13 and July 14, 2023, on the safety requirements for electrical utility infrastructure to address the increasing wildfire risks from climate change and aging infrastructure. SDG&E’s comments focus on the topics of Asset Replacement and Repair Frequency and Inspection of Assets.<sup>1</sup> The discussion points for these topics addressed (1) hard time (set schedule) vs. condition-based maintenance balancing to reduce wildfire risk, (2) inspection frequency and corrective action timelines, and (3) technology-enhanced inspections.

**I. SDG&E Supports a Data Driven Risk-Informed Inspection Strategy and Risk-Informed Condition-Based Maintenance**

SDG&E supports the recommendation to update CPUC General Order 165 to allow utilities to implement a data driven risk-informed inspection strategy that provides flexibility to incorporate evolving inspection technologies and innovation. We agree that a risk-informed approach to inspections would optimize resources, enhance wildfire safety, and improve inspection quality. We also understand the need to enforce minimum requirements and we would support further workshop discussions with the CPUC and other stakeholders to define requirements that would maintain inspection integrity, while allowing innovation and maintaining cost efficiencies.

SDG&E also supports a regulatory strategy that moves from schedule-based maintenance to risk-informed condition-based maintenance. Further, we support

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<sup>1</sup> Slides from the workshop on July 13 and 14, 2023 regarding "Safety Requirements Addressing Increasing Wildfire Risk" per Public Utilities Code 326(a)(7), slides 104-114.

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modifications to General Order 95, Rule 18 that provides flexibility to consider risk-prioritization of repairs and future projects that would correct the maintenance issue while also contributing to wildfire mitigation, reliability, climate resilience or equity. SDG&E would also support further workshop discussions with the CPUC and other stakeholders on a risk-informed condition-based maintenance strategy.

## **II. Conclusion**

SDG&E appreciates the efforts of Energy Safety in reviewing the safety requirements for electrical utility infrastructure to address the increasing wildfire risks from climate change and aging infrastructure and looks forward to further participating in this effort after Energy Safety provides its recommendations to the CPUC.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for  
San Diego Gas and Electric Company