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**VIA ELECTRONIC FILING**

**Docket # 2023-IE**

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

**RE: SDG&E Comments to Independent Evaluator 2022 WMP Annual Report on Compliance**

Dear Director Thomas Jacobs:

SDG&E hereby provides comments to the Independent Evaluator's (IE) Final Independent Evaluator Annual Report on Compliance (IE Report) on SDG&E's 2022 Wildfire Mitigation Plan (WMP) released on July 25, 2023. SDG&E appreciates the IE's conclusion that SDG&E has completed the WMP programs outlined in the SDG&E 2022 approved WMP. SDG&E's comments focus on areas of misunderstanding and aim to correct certain inaccuracies in the IE's findings. SDG&E respectfully requests that Energy Safety consider these comments when assessing SDG&E's compliance with its 2022 WMP.

**I. COMMENTS TO SPECIFIC ITEMS WITHIN THE INDEPENDENT EVALUATOR REPORT**

**A. Large Volume Quantifiable – Not Field Verifiable**

**7.3.4.9.1 – WMP.551: HFTD Distribution Pole Inspections**

The IE notes that it was unable to validate that SDG&E met its goal of 12,268 inspections for HFTD Tier 3 distribution pole inspections. This is due to an inadvertent error in compiling the data initially provided to the IE regarding the initiative. But SDG&E's quarterly reporting and the data viewed in total show that SDG&E completed its target for this initiative. In response to DR-002, SDG&E inadvertently only included 407 inspections completed under one WMP Initiative Tracking ID, but the Distribution Pole Inspections program was actually associated with two WMP Initiative Tracking IDs in 2022. In preparing the initial data for the IE, SDG&E did not include the additional completed pole inspections that were tracked using the second Initiative Tracking ID. The data shows that, in total, SDG&E completed 12,790 inspections, exceeding its 2022 target.

The complete data set of 12,790 inspections was provided to the IE via SDG&E's 2022 QDRs and described in SDG&E's Annual Report on Compliance. SDG&E is also providing as an attachment to these comments a revised version of the data request, noting the complete data set of 12,790 inspections.<sup>1</sup> While it is unfortunate that the complete data set was not provided and the IE could not follow up on the information given the limited timeframe to complete the report, SDG&E affirms that it did meet the stated targets for this initiative.

Relatedly, SDG&E requests a correction to Table 26 (pg. 57) of the Final IE ARC, which currently states that the IE was unable to validate compliance for Additional Transmission Aerial 69kV Tier 3 Visual Inspections. It appears this is an error in the report, as the IE Report notes on page 56 that SDG&E's goal for this initiative was met. As Table 26 indicates that the HFTD Tier 3 Distribution Pole Inspections were completed, SDG&E assumes that the IE may have transposed the findings for these initiatives. As noted above, SDG&E met its targets for both initiatives, and requests that the final IE Report reflect as such.

#### **7.3.5.9 – WMP.501: Other Discretionary Inspections of Vegetation Around Distribution Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations**

With respect to the targets and performance related to WMP.510, SDG&E clarifies that all 12,500 of the targeted trees were inspected for enhanced vegetation management (EVM). SDG&E's EVM program is composed of 1) a pre-inspection during which SDG&E's tree trimming contractors inspect trees within the proximity of the powerlines to ascertain their conditions and risk posed to infrastructure, and 2) trimming trees that pose a threat to infrastructure to clearances in excess of regulatory requirements. Not all trees inspected may require enhanced post-trim clearances. SDG&E inspected all of the targeted trees for this initiative, however, upon inspection, only 10,488 (84%) of the 12,500 targeted trees were determined to require trimming to an enhanced post-trim clearance. The remaining 16% were determined not to require enhanced clearance, however they may have been trimmed to remain compliant with applicable rules and regulations.

The distinction between inspections and trees requiring EVM was addressed in the SDG&E's 2022 ARC, Section 6.5:

*“The pre-inspection activity does not prescribe post-trim clearance, however the determination of whether a tree requires removal or substantial crown reduction due to growth rate or defect is made by the pre-inspector. There is a high degree of variability in forecasting the number of trees that may require enhanced trimming, including but not limited to: species, precipitation, tree growth, location of defect, pruning frequency, and regional tree mortality. The methodology to derive the target for this initiative was modified in 2022 using tree inventory trim frequency data and historical averages. However, since SDG&E only formally began its enhanced trim/removal initiative in 2019, the data is still somewhat limited for forecasting using a trend analysis with a high degree of confidence. Using current trends, a more likely accurate forecast number of*

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<sup>1</sup> A revised version of SDG&E's data request has been concurrently submitted to Docket #2023-IE titled “SDGE Comments to 2022 WMP IE ARC\_Atch\_DR002\_Revised\_WMP551.xlsx.”

*trees that will require enhanced clearance annually is between 10,000 and 11,000. SDG&E will continue to review its methodology to derive an appropriate, annual target for this initiative.”*

SDG&E further states in the WMP 2022 update under initiative 7.3.5.15:

*“The determination of how much clearance is to be obtained at time of trim is based on several tree factors including minimum clearance requirement, voltage, species, location, branch structure, tree health, proper pruning practices, location of tree defect, etc. The tree contractor makes the determination of post-trim clearances in order to maintain compliance for the annual cycle, and to abate any structural hazard present in the tree.”*

The IE interpreted the target for initiative 7.3.5.9 as relating to the inspection of trees that require EVM. The 12,500 quantitative target for 7.3.5.9 was actually the number of trees that SDG&E forecasted to receive enhanced clearance by year’s end. Because Table 18 in the IE Report represents the target and actual number of trees that were trimmed to enhanced clearances, and is not related to the number of inspections performed as stated in the report, SDG&E requests that Table 18 be edited to reflect “trees trimmed” and not inspections as the Energy Safety consider this distinction in reviewing the Report. Because Table 18 in the IE Report represents the target and actual number of trees that were trimmed to enhanced clearances, and is not related to the number of inspections performed as stated in the report, SDG&E requests that Energy Safety consider this distinction in reviewing the Report.

## **B. Large Volume Quantifiable – Field Verifiable**

### **7.3.3.18.2 – WMP.550: Lightning Arrestor Removal and Replacement**

The IE Report indicates on page 25 that two locations comprising five lightning arrestors still had non-exempt lightning arrestors installed, namely P417678 and P163435. SDG&E performed a review of the two listed locations, and per as-built drawings and SDG&E photos, confirmed that the installed lightning arrestors are CFLA and BKTAMK exempt lightning arrestors. SDG&E requests that Energy Safety note that the lightning arrestors at these two locations are in fact exempt.

### **7.3.3.18.3 – WMP.972: Avian Mitigation**

The IE Report indicates on page 33 that two locations did not have avian protection installed, namely P1100993 and P872843. SDG&E suggests a correction to the report identifying P1100993 correctly as P110993. SDG&E performed a review of these locations and per as-built drawings and photos confirms that covered jumper wire was installed at these locations bringing avian protection up to standard. SDG&E requests that Energy Safety note that these two poles did have avian protection work performed in accordance with SDG&E standards.

The IE Report indicates on page 34 that there are 9 structures with avian protection that had partially failed at the time of assessment with at least one segment of the guard missing or gone. SDG&E is assessing these structures and will initiate corrective work to remediate any issues, if necessary.

### C. Verification of Funding

The identified discrepancy in financial reporting for *7.3.1.1 Summarized Risk Map*<sup>2</sup> in SDG&E's 2022 WMP ARC and Appendix A: ARC Summary is due to different means of reporting costs for various activities of work in the ARC Summary and the 2020 WMP ARC. SDG&E's 2022 WMP ARC accurately reflects the planned and actual costs associated with *7.3.1.1 Summarized Risk Map*. However, the 2022 WMP ARC summary, there are two rows that break out the combined costs associated with 7.3.1.1, namely 7.3.1.1 and *7.3.8.3 Risk spend efficiency analysis*. SDG&E understands the confusion that resulted from this inadvertent discrepancy in reporting and is submitting an amended ARC Summary with these comments.<sup>3</sup>

Regarding the verification of funding for WMP Initiative 7.3.3.17.3 CNF, the IE claims inconsistent spend reported for CNF in the ARC Summary (Appendix A) and in Table 19: Financial Summary for Grid Design and System Hardening Programs. SDG&E clarifies that Table 19 includes aggregated spend for all grid hardening programs, including but not limited to CNF.

## II. CONCLUSION

SDG&E thanks Energy Safety for this opportunity to comment on the Independent Evaluator report, and respectfully requests that Energy Safety and the Independent Evaluator take these recommendations into account when considering the report.

Respectfully submitted,

/s/ Laura M. Fulton  
Attorney for  
San Diego Gas and Electric Company

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<sup>2</sup> Final IE Report at 83.

<sup>3</sup> An amended version of SDG&E's 2022 ARC Summary is attached hereto.