



September 19, 2023

**Via Electronic Filing**

Caroline Thomas Jacobs, Director  
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**Subject: Public Advocates Office's Opening Comments on the Draft Decision Approving San Diego Gas & Electric Company's 2023-2025 Wildfire Mitigation Plan**

**Docket: 2023-2025-WMPs**

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments on the Draft Decision of the Office of Energy Infrastructure Safety (Energy Safety) approving San Diego Gas & Electric Company's (SDG&E) 2023-2025 Wildfire Mitigation Plan. Please contact Nathaniel Skinner ([Nathaniel.Skinner@cpuc.ca.gov](mailto:Nathaniel.Skinner@cpuc.ca.gov)), Program Manager, or Henry Burton ([Henry.Burton@cpuc.ca.gov](mailto:Henry.Burton@cpuc.ca.gov)), Program and Project Supervisor, with any questions relating to these comments.

We respectfully urge the Office of Energy Infrastructure Safety to adopt the recommendations discussed herein.

Respectfully submitted,

/s/ **Marybelle Ang**

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## I. INTRODUCTION

On March 27, 2023, San Diego Gas & Electric Company (SDG&E) filed its *2023-2025 Wildfire Mitigation Plan* (2023-2025 WMP).<sup>1</sup> On May 26, 2023, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) and other stakeholders filed formal comments on the 2023-2025 WMPs submitted by SDG&E and other large utilities.<sup>2</sup> On August 30, 2023, the Office of Energy Infrastructure Safety (Energy Safety) issued its *Draft Decision on 2023-2025 Wildfire Mitigation Plan of San Diego Gas & Electric Company* (Draft Decision).<sup>3</sup> The cover letter of the Draft Decision invites interested persons to file opening comments by September 19, 2023 and reply comments by September 29, 2023.

Cal Advocates submits these comments on the Draft Decision pursuant to the *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines* (2023 WMP Process Guidelines) and the cover letter of the Draft Decision.<sup>4</sup> In these comments, Cal Advocates makes the following principal recommendations:

- Energy Safety should revise its directive in Area for Continued Improvement (ACI) SDGE-23-06 to require an additional reporting requirement be implemented related to underground projects that are being completed on frequently de-energized circuits.
  - In its 2025 WMP update, SDG&E must submit a progress report and workplan for strategic undergrounding work on its frequently de-energized circuits that includes the following.
  - In its 2025 WMP update, SDG&E must explain its decision-making process regarding mitigation selection for frequently de-energized circuits.

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<sup>1</sup> SDG&E, *2023-2025 Wildfire Mitigation Plan*, March 27, 2023 (SDG&E's 2023-2025 WMP).

<sup>2</sup> Cal Advocates, *Comments of the Public Advocates Office on the 2023 to 2025 Wildfire Mitigation Plans of the Large Investor-Owned Utilities*, May 26, 2023 in Docket 2023-2025-WMPs (Cal Advocates Comments on 2023-2025 WMPs).

<sup>3</sup> Energy Safety, *Draft Decision on 2023-2025 Wildfire Mitigation Plan of San Diego Gas & Electric Company*, August 30, 2023 in Docket 2023-2025-WMPs (Draft Decision).

<sup>4</sup> Energy Safety, *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022.

## II. Grid Design and System Hardening

### A. Energy Safety should require SDG&E to report progress on system hardening for frequently de-energized circuits and explain its decision-making in this area (Area for Continued Improvement SDGE-23-06).

Energy Safety’s Draft Decision directs SDG&E to provide an analysis that demonstrates its selection process for undergrounding projects.<sup>5</sup> The Draft Decision requires additional reporting on SDG&E’s decision-making process related to implementing undergrounding over other wildfire system hardening mitigations. ACI SDGE-23-06 (“Demonstration of Proper Decision Making for Selection of Undergrounding Projects”) states that “SDG&E must provide an analysis demonstrating its process for the selection of undergrounding projects.” Location-specific analysis of ignition drivers and the effectiveness of mitigation options must be included in SDG&E’s 2025 WMP Update.<sup>6</sup>

The above requirement appears to be aimed at improving public understanding of SDG&E’s prioritization of undergrounding compared to other wildfire mitigations and to increase transparency on the performance of SDG&E’s WiNGS-Planning modeling tool.<sup>7</sup> Cal Advocates supports the goals of this directive. However, ACI SDGE-23-06 would benefit from the inclusion of an additional requirement.

Energy Safety’s Draft Decision does not address the limited progress of undergrounding work on SDG&E’s top fifteen frequently de-energized circuits.<sup>8</sup> It is important to ensure that SDG&E’s undergrounding efforts are appropriately targeting circuits that have been frequently de-energized and serve as repeat threats to customer safety. As Cal Advocates discussed in comments on the 2023 WMP, SDG&E has identified undergrounding as the primary system hardening mitigation planned for all frequently de-energized circuits.<sup>9</sup> However, SDG&E forecasts slow progress in undergrounding these circuits and has not committed to annual work

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<sup>5</sup> Draft Decision at 30.

<sup>6</sup> Draft Decision at 80.

<sup>7</sup> Draft Decision at 30.

<sup>8</sup> Cal Advocates Comments on 2023-2025 WMPs at 77-82.

<sup>9</sup> Cal Advocates Comments on 2023-2025 WMPs) at 78-79.

schedules for 2023 and 2024.<sup>10</sup> Undergrounding may not be the best mitigation strategy for all fifteen of these circuits: SDG&E could likely deliver benefits to customers most effectively if it considered a balanced mitigation strategy that includes covered conductor and operational mitigation measures.<sup>11</sup>

In its 2025 WMP submission, SDG&E should report on its progress toward reducing the risk of de-energization for customers. Energy Safety should require SDG&E to submit a table of the fifteen most frequently deenergized circuits that shows how much system hardening work has been completed and how much is planned for each of the next three calendar years. Energy Safety should require the proposed table be completed with data at the circuit-segment level since SDG&E has this level of granularity in its' WiNGS-Planning model. This data should be submitted as part of a workplan that will allow Energy Safety to determine if these circuits are being addressed in a timely manner and how the annual risk score is changing for each frequently de-energized circuit as a result of undergrounding work that is completed.

Energy Safety should also require SDG&E to sufficiently explain the decision-making that supports its reliance on undergrounding as the main mitigation measure for circuits that are the most at risk of being de-energized. It is crucial that Energy Safety require full transparency from SDG&E regarding its undergrounding decision-making as it remains SDG&E's most expensive system hardening initiative on a per mile basis and requires a substantially longer deployment timeframe than other mitigations.<sup>12</sup> <sup>13</sup>

Energy Safety should revise Area for Continued Improvement SDGE-23-06 in the Draft Decision, to include the following requirements:

- In its 2025 WMP update, SDG&E must submit a progress report and workplan for strategic undergrounding work on its frequently de-energized circuits that includes the following:
  - A table of frequently de-energized circuits. For *each circuit*, the table must show the mileage of undergrounding work that has been completed or is planned in each year from 2022 through 2026.

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<sup>10</sup> Cal Advocates Comments on 2023-2025 WMPs) at 79.

<sup>11</sup> Cal Advocates Comments on 2023-2025 WMPs at 79-80.

<sup>12</sup> Cal Advocates Comments on 2023-2025 WMPs at 80.

<sup>13</sup> Office of Energy Infrastructure Safety, Draft Decision on San Diego Gas & Electric Company's 2023-2025 WMP, August 31, 2023, at 30.

- A workplan with a list of the undergrounding *projects* affecting frequently de-energized circuits. The workplan must include circuit-segment name/ID, length that is being replaced, and the associated risk score for the circuit before and after the undergrounding project has been completed.
- In its 2025 WMP update, SDG&E must explain its decision-making process regarding mitigation selection for frequently de-energized circuits.
  - SDG&E must demonstrate that it has considered alternatives to undergrounding and show that it has selected the most appropriate mitigation measures for each frequently de-energized circuit.
  - SDG&E must show that its decision-making process for these circuits takes location-specific ignition drivers into account and uses location-specific analysis of mitigation effectiveness.

In sum, Energy Safety should strengthen directive SDGE-23-06 by including additional reporting requirements related to system hardening on frequently de-energized circuits. SDG&E should address these requirements within its 2025 WMP Update. SDG&E should have this information available, since its risk model has scoped strategic undergrounding work through 2032.<sup>14</sup> Therefore, the added requirements should not be unduly burdensome.

With these additional requirements, Energy Safety can achieve better insight into SDG&E's undergrounding decision-making process on riskier circuits. It will also provide Energy Safety with the ability to track the progress of projects on circuits that pose as repeat threats to public safety.

### **III. CONCLUSION**

Cal Advocates respectfully requests that Energy Safety adopt the recommendations discussed herein.

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<sup>14</sup> SDG&E's WMP 2023-2025 WMP, Appendix F at 12-17, March 27, 2023.

Respectfully submitted,

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