



San Diego Gas & Electric 2023 Change Order Report

November 1, 2023

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OEIS Docket No. 2023-2025-WMPs

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Change Order

The Office of Energy Infrastructure Safety (OEIS or Energy Safety) issued a final decision approving SDG&E's 2023-2025 Base WMP on October 13, 2023. In its 2023-2025 WMP Process Guidelines, Energy Safety requires utilities to submit a change order report if it seeks to change an initiative's risk by an increase or decrease of 25% in specific initiative categories delineated by the guidelines.¹ The guidelines also allow utilities to update quarterly initiative targets for 2024 initiatives to assist in adjusting to the year-ahead approach.

Energy Safety further stated that at a high level, the objective of the change order process is to ensure the electrical corporation continues to follow the most effective and efficient approach to mitigating its wildfire risk and acknowledged that the approach described in the WMPs could change as electrical corporations gain experience and measures its mitigations' outcomes.

Pursuant to Energy Safety's direction, SDG&E provides the following updates that meet the change order requirements.

¹ *Office of Energy Infrastructure Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines* (December 6, 2022) at Pgs. 22-28, OEIS Docket No 2023-2025-WMPs.

1. Changes for 2023 Initiatives

SDG&E requests no changes for 2023 mitigation initiatives.

2. Updates to 2024 Quarterly Initiative Targets

SDG&E requests to update 21 of 41 quarterly initiative targets for the year 2024 per Energy Safety's 2023-2025 WMP Process Guidelines.² In addition, SDG&E seeks to reestablish one initiative in 2024 for Weather Station Maintenance and Calibration (WMP.447, formerly *Advanced Weather Monitoring and Weather Stations*) in response to ACI SDGE-23-19.

SDG&E submits an amended Table 12 (Attachment A) as a comprehensive view of its requested target updates (updated targets are designated in red). In summary, SDG&E seeks to update the strategic scope of 8 initiatives with target updates and reestablish one initiative, as described in more detail below. The remaining 13 initiatives with target updates are updated 2024 work forecasts due to information that was not available at the time of SDG&E's 2023 – 2025 WMP submission, and require no further explanation.

A summary of SDG&E's 42 initiatives is presented in the table below.

Initiative	Target Update Requested	Strategic Scope Change
Distribution OH Hardening – Covered Conductor	Yes	Yes – described below
Strategic Undergrounding	No	No
Distribution OH System Hardening	Yes	No
Transmission OH Hardening	Yes	No
Transmission OH Hardening - Distribution Underbuild	Yes	No
Microgrids	Yes	Yes – described below
Advanced Protection	No	No
Early Fault Detection	No	No
Distribution Communications Reliability Improvements	Yes	Yes – described below
Capacitor Maintenance and replacement program (SCADA)	No	No
Expulsion fuse replacement	No	No
Maintenance, repair, and replacement of connectors, including hotline clamps	No	No
Lightning arrester removal and replacement	No	No
Avian Protection	No	No
Strategic Pole Replacement Program	Yes	Yes – described below
Wireless Fault Indicators	Yes	Yes – described below
PSPS Sectionalizing Enhancements	No	No
Fixed Backup Power	Yes	Yes – described below
Distribution Overhead Detailed Inspections	Yes	No

² Office of Energy Infrastructure Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines (December 6, 2022) at Pgs. 22-28, OEIS Docket No 2023-2025-WMPs.

Initiative	Target Update Requested	Strategic Scope Change
Transmission Overhead Detailed Inspections	Yes	No
Distribution Infrared Inspections	Yes	Yes – described below
Transmission Infrared Inspections	Yes	No
Distribution Wood Pole Intrusive Inspections	No	No
Transmission Wood Pole Intrusive Inspections	Yes	No
Drone Assessments	No	No
Distribution Overhead Patrol Inspections	Yes	No
Transmission Overhead Patrol Inspections	Yes	No
Transmission 69kV Tier 3 Visual Inspections	Yes	No
Substation Patrol inspections	Yes	No
QA/QC of Transmission Inspections	No	No
QA/QC of Distribution Detailed Inspections	Yes	No
QA/QC of Distribution Drone Assessments	No	No
QA/QC of Wood Pole Intrusive (Transmission & Distribution)	Yes	No
QA/QC of Substation Inspections	No	No
Air Quality Index	Yes	Yes – described below
Weather Station Maintenance and Calibration	New initiative	New initiative
Detailed Inspections (Vegetation Mgmt)	No	No
Off-Cycle Patrol	No	No
Fuels management	No	No
Pole Clearing (Brushing)	No	No
Clearance	No	No
QA/QC Vegetation Management	No	No

Covered Conductor (WMP.455)

The 2024 target for Covered Conductor is reduced from 60 miles to 40 miles. The target reduction is due to design and engineering delays for approximately 20 miles of work due to various factors. The design delays and subsequent activities in the project schedule forecast, including land rights, permitting, and environmental constraints pushed the forecasted issuance of jobs to construction into fourth quarter 2024. Ultimately, SDG&E is still forecasting to complete its three-year objectives by increasing the target miles in 2025.

Strategic Pole Replacement (WMP.1189)

SDG&E identified an additional driver increasing the scope and target for this program in 2024 from 200 to 267. SDG&E has found approximately 250 poles in the HFTD that require pole loading remediation through various other projects outside of its Corrective Maintenance Program (CMP) and grid hardening initiatives. As a result, SDG&E plans to increase the scope of Strategic Pole Replacement program by

approximately 50 poles per year for the next 5 years (2024 – 2028). Additionally, 17 poles scheduled to be completed in 2023 are postponed to 2024 due to delayed design and limited construction resources.

Distribution Infrared Inspections (WMP.481)

SDG&E is reducing the 2024 target for this program from approximately 9,500 structures to 300 structures. The selection of structures for Distribution Infrared Inspections is evolving into a risk-informed strategy beginning in 2024. In prior years, structures selected for this program were based on previously inspected structures to ensure no repeat inspections were performed in consecutive years and on subject matter experts' (SME) recommendations. SDG&E has found that this inspection program yielded only a 0.2% findings rate to date in 2023. To optimize this program and make it more effective in 2024, the program will target specific areas in the WUI during peak load season and structures will be selected using a risk-informed strategy comprised of Asset 360 models, risk analytics models, and Intelligent Image Processing (IIP). For more information on the models and technology utilized, please refer to SDG&E's 2023 – 2025 WMP.

Wireless Fault Indicators (WMP.449)

SDG&E has installed wireless fault indicators (WFIs) at 763 locations since its inception in 2011. With advancements made from implementing SCADA devices (WMP.453) and the future work planned for the SCADA program, there is no longer a need for additional grid monitoring from WFI installations. Thus, SDG&E has determined no additional work is required nor planned and considers the program complete. The 2024 target is reduced from 300 to zero installations.

Distribution Communications Reliability Improvements (WMP.549)

SDG&E is reducing the 2024 target for this program from 60 to 15 base stations. Most sites planned for base station installation have engineered steel foundation poles that will have the telecommunication antennas at the top of the pole and electric (12kV and below) attachments in the middle of the pole. The poles are currently undergoing standardization, and it has taken more time than expected to develop the specifications for the poles including workspace, operational, and manufacturing requirements. To complete the pole standardization, three pilot sites were selected and pole orders are expected to be placed by the end of 2023. With construction of these three sites, SDG&E anticipates completing the standardization of these unique pole designs with all internal stakeholders to accelerate the program in 2025 and beyond. In addition, SDG&E is making process improvements with substation and transmission facility engineering and operations groups, to ensure proper site selection and working through design and construction process.

The modifications in our workplan will delay the communications reliability improvements expected with the SDG&E owned private LTE network backbone needed for some of SDG&E's Advanced Protection Programs (APP) including Falling Conductor Protection (FCP) and Early Fault Detection (EFD). FCP and EFD work can continue to be deployed in the interim and will be enhanced once the LTE backbone is completed.

Air Quality Index (WMP.970)

The Air Quality Index Program has sufficiently installed 15 particulate sensors between 2022 and 2023. The last remaining particulate sensor will be installed by the end of 2023. SDG&E procured 18 total sensors, one of which is used as a master unit used for calibration and an additional spare. The HFTD will be 100% covered by the 16 installed sensors and further installations would not provide additional

benefit. The Air Quality Index Program's target for 2024 has been reduced to zero installations. The Air Quality Program will continue to monitor and maintain the sensors, and it retains the ability to assess for future upgrades as necessary.

Standby Power Program (Fixed Backup Power) (WMP.468)

The Fixed Backup Power program continues its success in 2023 and is on track to install over 300 permanent generators for customers that were not otherwise scheduled for mitigation efforts. This brings the total installations over the lifetime of the program to just under 1,200 residences serviced. Due to the success of the program historically, as well as the success of other programs within the WMP, SDG&E will use the 2024 year to complete outstanding projects pending from prior years. The revised 2024 target is reduced from 300 generators to 58 generators. This effort represents a period of completion to areas that have been previously invited to participate in the program, as well as a period of evaluation to determine how individual mitigation offerings fit into the larger vision of the WMP.

Microgrids (WMP.462)

Due to delays in acquiring appropriate and sufficient land rights, on-going supply chain issues resulting in an increase to material costs (i.e. battery, solar photovoltaic panels), and increased labor costs, the Microgrids target for 2024 is reduced from 3 to 1. Completions of Shelter Valley and Butterfield microgrids have shifted to 2025. Both microgrids are commissioned and capable of serving customers, therefore meeting the risk reduction intention, but the projects are not considered complete until renewable configuration is completed.

Weather Station Maintenance and Calibration (WMP.447)

SDG&E is reinstating WMP.447 (formerly *Advanced Weather Monitoring and Weather Stations*) as Weather Station Maintenance and Calibration in 2024 and is targeting 222 weather stations. The primary purpose of the SDGE weather network is to monitor dangerous fire weather conditions to include air temperature, wind speed, wind gust, wind direction, and relative humidity. Highly accurate measurements and reliable reporting are critical. Station instruments are calibrated annually in alignment with National Weather Service (NWS) procedures and maintenance includes routine replacement of aging sensors. Each station transmits data every 10 minutes both via cellular and spread spectrum radio. The Weather Station Network increases situational awareness and obtains foundational data for operational and mission critical activities. Calibration and maintenance of weather stations is crucial for ensuring accurate, reliable, and high-quality data. SDGE Weather Station Network (Document Number 4506) covers the general purpose, installation, maintenance and access to the weather data. The Weather Station Inspection, Testing and Maintenance (Document Number 532.075) defines the procedure for performing maintenance and calibration of every weather station in the network at least once annually. SDG&E successfully completed maintenance and calibration activities on 219 of the 222 weather stations year to date in 2023 and will begin reporting on these activities in 2024 via the Quarterly Data Report (QDR) process.