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VIA ELECTRONIC FILING

Docket # Data Guidelines

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

SDG&E Comments on Draft Data Guidelines v3.2

Dear Director Thomas Jacobs:

San Diego Gas & Electric (“SDG&E”) hereby provides comments addressing the Draft Data Guidelines v3.2 (“Draft Guidelines”) issued by the Office of Energy Infrastructure Safety (“Energy Safety”) on December 15, 2023.

1. Data Filing Requirements

SDG&E asks Energy Safety to provide all components of the Quarterly Data Report (“QDR”) when releasing an updated version of guidelines so there is adequate time to review, address remaining questions, and adhere to new requirements. The Geodatabase (“GDB”) templates, spatial status report spreadsheet and domain extract have not yet been developed by Energy Safety. The absence of these required forms in early guideline development places a potential burden on SDG&E to make sudden shifts and may result in a delay in reporting.

SDG&E also asks Energy Safety to keep the previous year's historical data in the QDR tables, to account for the potential true up of lingering data that may not be accounted for within the previous quarters. This request does not pertain to corrected data.

2. Added and Changed Values

A. Removal of Default Values

SDG&E would like to emphasize the impact of removing all default values (i.e. -99, Unknown, N/A). Due to the high volume (over 100) and SDG&E’s continuous efforts towards automation of the quarterly deliverable, this change poses significant time and

effort to complete. SDG&E requests that Energy Safety take additional time to thoroughly review and vet future changes in this area to minimize the duplication of efforts. This will allow the utilities to focus on value-add areas of the QDR.

In addition, most default values have been removed within the Guidelines; however, the following were not modified. SDG&E seeks clarification if the following default values remain applicable:

- PSPSEventConductorDamageDetail.LikelyArchiving (Unknown)
- Ignition.FireSize (Unknown)
- Ignition.SuppressedBy (Unknown)
- WireDown.Energized (Unknown and N/A)

B. Tree Count Criteria

SDG&E asks Energy Safety to adjust the qualifier for Tree Count fields within Vegetation Management Project and Vegetation Inspection feature classes as follows:

From - Trees counted must be over 6” Diameter Breast Height (“DBH”) and outside a 4’ radius of the conductor.

To - Trees over 6” DBH and outside a 4’ radius of the conductor must be counted.

This provides a clear standard and will allow the Utilities to exceed Energy Safety’s requirements while aligning with the internal requirements and/or regulations. SDG&E classifies a tree as having a diameter of at least 3”, and vegetation < 3” diameter as “brush”. Both trees and brush are combined as units of SDG&E’s tree inventory. Furthermore, this conflicts with the GO 95 requirement of a minimum of 4’ clearance in High Fire Transmission District (“HFTD”).

C. Asset Location

SDG&E acknowledges the change to Switchgear from Asset Overhead or Underground (“OHUG”) to Asset Location and the addition of Surface (Padmount) domain value. This now aligns with Transformer Site Asset Location. The following fields remain as OHUG:

- Connection Device – Asset OHUG
- Grid Hardening Point – Asset OHUG

After further review, Grid Hardening Point allows for the initiative to be mapped to Switchgear and Transformer Site; however, the Asset OHUG does not align with the equivalent field Asset Location. SDG&E requests to modify both Connection Device and

Grid Hardening Point for consistency and continuity within the data model. Additionally, the addition of Asset Location to Support Structure. This field does not exist as it is only required to provide overhead structures; however, to properly represent the Grid Hardening initiatives (Strategic Undergrounding) and to populate Support Structure Detail, it is required to include Overhead, Underground and Surface structures.

D. Initiative Audit

As per the August 2023 Energy Safety QDR Meeting, SDG&E proposed changes to Initiative Audit. Upon request, these changes were sent to Energy Safety. SDG&E would like to request the following fields to be added to the feature class in the final data guidelines:

- AuditUtilityInitiativeActivityID – the ID of the audit program
- UtilityInitiativeActivityID – the ID of the program being audited
- AuditDate – date the audit was performed
- ActivityDate – date of the original activity being audited (this can go back to the prior year)
- AssetType – What type of asset is being audited
- BusinessID – What asset is being audited
- InitiativeTarget – Consistency with other Initiative feature classes
- QuarterlyProgress – Track the number of units for each record and consistency with other Initiative feature classes
- CumulativeProgress – Consistency with other Initiative feature classes and ties to Table 1 Actuals for the reporting quarter

These changes allow for consistency with the other Initiative feature classes, details on when the audit occurred and details on what is being audited.

SDG&E suggests a workshop to review this feature class and how it relates to other objects within the model amongst all Utilities.

E. Ignition Latitude and Longitude

In version 3.0, all latitude and longitude fields were removed from the file geodatabase template, except the Ignition feature class. Although SDG&E continues to maintain this data outside of the GDB, to promote consistency, the latitude and longitude for Ignition feature class should also be removed.

F. Risk Field Data Type

As per the August 2023 Energy Safety QDR Meeting, SDG&E is requesting to have the data type changed from string to numeric for the following fields in all Asset Line feature classes:

- Overall Utility Risk

- Ignition Risk
- PSPS Risk

This will allow for analysis to be conducted on the risk scores within GIS.

G. Field Data Type/Length

As requested by Energy Safety in the November 2023 QDR meeting, below is a summary of the suggested changes to data types and/or lengths within the geodatabase. SDG&E is requesting the following be incorporated into these guidelines:

- SCADAEnabled – String (10) - request to keep the length at 3 as the default value “Unknown” was removed from the domain value list and Yes/No has a max of 3 characters
- HasAnemometer – String (10) - same as SCADAEnabled
- HasFuelMoistureSensor – String (10) - Same as SCADAEnabled
- Substation Operating Voltage – String (10) - request to increase the length from 10 characters to a minimum of 20 characters to satisfy the requirement to “Include all applicable voltages separated by slashes (e.g., “230/139/69/12”)”
- Substation Nominal Voltage – String (10) - same as Substation Operating Voltage
- Overall Utility Risk – String – request to change data type to numeric to allow for analysis to be conducted on risk scores within GIS
- Ignition Risk – String – same as Overall Utility Risk
- PSPS Risk – String – same as Overall Utility Risk

H. Program Name

SDG&E requests to have the Program Name added to all Initiative Feature classes. Currently, it only exists for Asset Inspection and Veg Inspection feature classes. Applying the same Wildfire Mitigation Plan (“WMP”) Initiative Activity to multiple initiatives in the same feature class makes it challenging to understand what the initiative is without knowing the Utility Initiative Activity ID for each.

I. Metric field value formatting

SDG&E asks Energy Safety to consider the highly burdensome and time-consuming effort it takes to update logic for field values that have been modified when data is in an automated state (e.g.: abc/123 versus abc / 123) and requests that Energy Safety require modifications only where reasonable and necessary.

J. Metric field value formatting

SDG&E requests Energy Safety keep Metric Order columns as it is written into the data logic and needed for proper tracking of historical datasets.

3. Conclusion

SDG&E requests that Energy Safety take these recommendations into account in the Final Data Guidelines v3.2.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company