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Docket # 2021-ARC

Patrick Doherty  
Program Manager, Compliance Assurance Division  
Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**RE: SDG&E Comments on the Office of Energy Infrastructure Safety's Annual Report on Compliance Regarding San Diego Gas & Electric Company's Execution of its 2021 Wildfire Mitigation Plan**

Dear Program Manager Doherty:

SDG&E hereby provides comments to the Office of Energy Infrastructure Safety's (Energy Safety) Annual Report on Compliance (ARC) regarding San Diego Gas & Electric Company's (SDG&E) execution of its 2021 Wildfire Mitigation Plan (WMP) released on March 29, 2024. SDG&E appreciates Energy Safety's conclusion that while SDG&E did not meet all targets for its WMP initiatives, the failure to meet certain targets did not materially hinder SDG&E's ability to mitigate its wildfire risk. SDG&E's brief comments aim to provide additional details regarding certain aspects of Energy Safety's report and reiterate SDG&E's concerns that overreliance or overemphasis on outcome-based metrics may not accurately reflect SDG&E's overall compliance with its WMP targets and objectives.

**I. 5.1.1 Completion of 2021 WMP Quantitative and Qualitative Targets**

**A. Asset Management and Inspections: Detailed Inspections of Transmission Electric Lines and Equipment (7.3.4.2)**

Energy Safety reports that SDG&E completed 73% of its targeted inspections in 2021. While Energy Safety accurately reports 2,715 inspections as SDG&E's established target for the program and 1,975 completed inspections, SDG&E affirms that it performed all inspections that were required in 2021 per its CAISO-approved transmission maintenance practice, thus achieving its intended risk reduction. SDG&E's methodology for developing the 2021 program target was to consider the count of transmission overhead structures and divide that count by three, as transmission overhead structures are inspected on a 3-year cycle. The target of 2,715 structures

was higher than the actual structures due to be inspected in 2021. SDG&E has since evolved its methodology to more accurately forecast structures due for inspection in any given year.

## II. Appendix D – 4.1.3 Outcome Metrics

Energy Safety states that SDG&E reported one structure damaged or destroyed by SDG&E-ignited wildfire within the short-term patterns and one critical infrastructure damaged or destroyed by SDG&E-ignited wildfire within the long-term patterns. Within SDG&E's QDR Table 2 there were erroneous small numbers that rounded to zero located within the critical infrastructure damaged or destroyed by utility-ignited wildfire row (metric 5.b.) These erroneous numbers added up to approximately 0.4 and were rounded up by Energy Safety as 1 within the report. SDG&E clarifies that these numbers were entered erroneously and were not captured in QA/QC by SDG&E as the numbers show as a zero within the report. SDG&E confirms that no structures or critical infrastructure were damaged or destroyed by SDG&E-ignited wildfires in 2021.

## III. Reliance on Outcome Metrics May Not Accurately Reflect WMP Compliance

Energy Safety notes that it accounts for many factors in its assessment of WMP compliance for 2023, including “wildfire risk reduction, including the performance of the electrical corporation's infrastructure relative to its wildfire risk, as measured by changes in the occurrence of events that correlate to wildfire risk.”<sup>1</sup> As explained in SDG&E's Comments to Energy Safety's Draft Annual Report on Compliance for SDG&E's 2020 Wildfire Mitigation Plan, SDG&E remains concerned that overreliance or overemphasis on outcome based metrics may not accurately reflect SDG&E's overall compliance with its Wildfire Mitigation Plan targets and objectives. SDG&E's overall goal is always to completely prevent utility-related wildfires, however, this goal is not necessarily consistent with the WMP compliance standards set forth in Public Utilities Code Section 8386.3.

Consistent with its prior comments on this issue, SDG&E reiterates that Energy Safety should make clear that outcomes, including but not limited to wire down events, unplanned outages, vegetation caused outages, the scope and frequency of public safety power shutoff (PSPS) events, and number of ignitions will be used to inform and enhance the development of future WMP initiatives, not determine whether an electrical corporation has performed according to its past WMP. Over its decade of wildfire mitigation efforts, SDG&E has repeatedly demonstrated its commitment to implementing measurable, effective, and dynamic wildfire mitigation initiatives aimed at reducing the risk of infrastructure-related ignitions and the impacts of PSPS events. Whether SDG&E performed the actions outlined in its WMP forms the basis for the standard of compliance established in Public Utilities Code Section 8386.3(c).<sup>2</sup> Application of post-hoc outcome analysis leaves the electrical corporations' compliance in a state of uncertainty and dependent upon a number of factors far outside the utilities' control, including weather conditions and fuel moisture.

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<sup>1</sup> 2021 ARC at 5.

<sup>2</sup> See, *SDG&E Opening Comments to Energy Safety's Draft Annual Report on Compliance for SDG&E's 2020 Wildfire Mitigation Plan*, Docket No. 2020-ARC (Dec. 13, 2022).

**IV. CONCLUSION**

SDG&E thanks Energy Safety for this opportunity to comment on its Annual Report on Compliance regarding SDG&E's execution of its 2021 WMP.

Respectfully submitted,

/s/ Laura M. Fulton

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San Diego Gas and Electric Company