May 7, 2024 **Via Electronic Filing**

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Subject: **Comments of the Public Advocates Office on SDG&E's 2025 Wildfire Mitigation Plan Update**

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 2025 Wildfire Mitigation Plan Update of San Diego Gas & Electric Company (SDG&E). Please contact Nathaniel Skinner (Nathaniel.Skinner@cpuc.ca.gov) or Henry Burton (Henry.Burton@cpuc.ca.gov) with any questions relating to these comments.

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

Sincerely yours,

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I. INTRODUCTION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these comments on the 2025 Wildfire Mitigation Plan (WMP) Updates submitted by investor-owned electric utilities (IOUs or utilities).[1] These comments are submitted pursuant to the Office of Energy Infrastructure Safety's (Energy Safety) *Revised 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines* (WMP Process Guidelines)[2] and the *Revised 2025 Wildfire Mitigation Plan Update Schedule*.[3]

The 2025 Wildfire Mitigation Plan Update Guidelines (2025 WMP Update Guidelines)[4] establish substantive requirements for these WMP Update submissions, while the WMP Process Guidelines establish a schedule and review process for WMP submissions. Bear Valley Electric Service (BVES), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE) submitted 2025 WMP Updates on April 2, 2024.

The WMP Process Guidelines and the 2025 WMP Update schedule permit interested persons to file opening comments on the WMP Updates of BVES, PG&E, SDG&E, and SCE by May 7, 2024 and reply comments by May 17, 2024. In these comments, Cal Advocates addresses SDG&E's 2025 WMP Update.

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[1] Many of the Public Utilities Code requirements relating to wildfires apply to "electrical corporations." *See e,g,* Public Utilities Code Section 8386. These comments use the more common term "utilities" and the phrase "electrical corporations" interchangeably to refer to the entities that must comply with the wildfire safety provisions of the Public Utilities Code.

[2] Office of Energy Infrastructure Safety's (Energy Safety), *Revised 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, January 31, 2024, in docket 2023-2025-WMPs.

See also: Energy Safety, *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022.

[3] Energy Safety, *Revised 2025 Wildfire Mitigation Plan Update Schedule*, February 22, 2024, in docket 2023-2025-WMPs.

[4] Energy Safety, *2025 Wildfire Mitigation Plan Update Guidelines*, January 31, 2024, in docket 2023-2025-WMPs.

II. TABLE OF RECOMMENDATIONS

Item	Recommendation	Timeframe	Section of these Comments
1	Energy Safety should require SDG&E to report on findings and analyses related to its efforts to improve its risk models.	2026-2028 WMP	III.A
2	Energy Safety should require SDG&E to report on results and findings of the two risk-model exploratory tracks on a quarterly basis, or in the alternative as part of the 2026-2028 WMP. SDG&E should continue reporting regularly until implementation is complete.	Quarterly Reports or 2026-2028 WMP	III.A.3
3	Energy Safety should require SDG&E to finish estimating the effects of covered conductor on PSPS risk.	Revised 2025 WMP Update	IV.A
4	SDG&E should provide a timeline and the specific steps needed to determine how covered conductor reduces PSPS risk and to revise its wind speed thresholds.	Revised 2025 WMP Update	IV.A
5	Energy Safety should require SDG&E to correct shortcomings related to QA/QC of asset inspections.	Revised 2025 WMP Update	V.A
6	Energy Safety should require SDG&E to explain how it will address the impacts of changing its QA/QC process.	Revised 2025 WMP Update	V.A.2
7	SDG&E should examine the potential consequences and trends that may arise from changes to its QA/QC process. In particular, SDG&E should prepare for a potential increase in maintenance tags.	Revised 2025 WMP Update	V.A.2
8	Energy Safety should require SDG&E to report interim QA/QC pass/fail rates for 2024, based on its current QA/QC procedures.	2024 Quarterly Data Reports	V.A.4
9	Energy Safety should also require SDG&E to report its QA/QC data for 2023.	Revised 2025 WMP Update	V.A.4

III. RISK ASSESSMENT AND MODELING

A. Energy Safety should require SDG&E to report on findings and analyses related to its efforts to improve its risk models.

In its 2023 approval decision, Energy Safety required SDG&E to provide a plan that details the transition from using maximum consequence values to probability distribution, for its Wildfire Next Generation System (WiNGS) risk models.[5, 6] SDG&E's 2025 WMP Update states that it is researching ways to move towards utilizing probability distribution. To support this transition, SDG&E plans to conduct two parallel, exploratory development tracks during 2024: one which will focus on how to incorporate the WiNGS-Operations (WiNGS-Ops) methodology into the WiNGS-Planning model, and the other which will focus on how to implement probability distribution using the existing annual FireCast model output.[7] As explained below, SDG&E provides insufficient details on these efforts in its WMP Update.

1. SDG&E provides insufficient details on the merger of its operational and planning models.

SDG&E seeks to incorporate the WiNGS-Ops methodology into the WiNGS-Planning model.[8] This may be a challenge, as the purposes of the two models are quite different. SDG&E describes the WiNGS-Ops model as "a real-time decision-making tool built to evaluate and compare wildfire and PSPS risks at the asset level (pole/span) and the sub-circuit/segment level."[9] SDG&E uses the WiNGS-Ops model "to help inform decision makers in real-time about the Wildfire and Public Safety Power Shutoff (PSPS) risks, which will guide risk-based de-energization decisions during risk events."[10] In contrast, SDG&E describes the WiNGS-Planning model tool as a way to help identify the best deployment of undergrounding and covered conductor for the utility's long term mitigation strategy.[11]

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[5] Energy Safety, *Final Decision on San Diego Gas & Electric's 2023-2025 Wildfire Mitigation Plan,* October 13, 2023 (Final Decision on SDG&E's 2023-2025 WMP) at 42.

[6] SDG&E's 2025 WMP Update at 42.

[7] SDG&E's 2025 WMP Update at 43.

[8] SDG&E's 2025 WMP Update at 43.

[9] SDG&E's 2025 WMP Update at 2.

[10] SDG&E 2023-2025 Base WMP Redlined, April 2, 2024, at 427.

[11] Cal Advocates Comments on 2023-2025 WMPs at 66-67, n. 276.

The inclusion of the WiNGS-Ops methodology into the WiNGS-Planning model means that SDG&E will be able to include PSPS risk into its mitigation decision framework.[12] However, SDG&E provides a vague timeline of when this specific enhancement will be fully implemented.[13] In response to discovery, SDG&E claims that the WiNGS-Planning model will be fully transitioned in time for its 2026-2028 comprehensive WMP filing.[14] As a part of this transition, SDG&E plans to "include PSPS de-energizations as part of the RSE score and mitigation selection framework. Development on this feature is expected to commence in 2024."[15] However, SDG&E does not go into further detail or provide a more specific timeline for this commitment.

Further reporting on the development and integration of the WiNGS-Ops methodology into the WiNGS-Planning model is critical because the resulting outputs may change where SDG&E will propose to perform risk reduction work on their system. According to SGD&E, any such changes would first appear in the 2026-2028 WMPs. Energy Safety and intervenors should be able to see and understand how PSPS risk is shaping SDG&E's risk-spend efficiency estimates and mitigation selections.

Energy Safety should direct SDG&E to report regularly on its progress in this transition. As part of the reporting requirement, SDG&E should describe how the inclusion of PSPS risk changes the output of SDG&E's wildfire risk models and the selection of mitigation work.

2. SDG&E provides insufficient details on the incorporation of probability distributions into its risk modeling.

The second track of risk modeling changes is SDG&E's implementation of probability distributions using the existing annual FireCast model output. The FireCast model output functions as a contributing factor towards the consequence portion of SDG&E's wildfire risk

[12] SDG&E's 2025 WMP Update at 45.

[13] SDG&E's 2025 WMP Update at 43 ["A major component of this task will include the development of a probability distribution consequence score built on Technosylva's Wildfire Analyst (WFA) daily model runs. This method has a congenital dependency that requires *a minimum time period of at least 1 year* in order to generate an accurate distribution of weather conditions for the service territory." (emphasis added)].

[14] SDG&E's response to data request CalAdvocates-SDGE-2025WMP-05, question 1(a), April 16, 2024.

[15] SDG&E's 2025 WMP Update at 61.

model.[16] As part of the WiNGS-Planning Cost/Benefit Transition Plan, SDG&E expects to complete its exploratory data analysis on wildfire consequence probability distributions during the second quarter of 2024.

As part of this analysis, SDG&E expects to understand the differences between the percentiles in the FireCast attribute outputs and the effects that they have on mitigation selection.[17] However, SDG&E does not explain how the percentile outputs from the FireCast model will affect the mitigation decision framework, which SDG&E uses to determine mitigation type and priority for system hardening projects.[18] While SDG&E provides a development timeline for this risk modeling change, SDG&E fails to explain how the FireCast model will be evaluated and how lessons learned will be incorporated as part of the mitigation selection framework moving forward.[19]

3. Remedies: Energy Safety should require SDG&E to report regularly on the development of its risk models.

Energy Safety should require SDG&E to report regularly on the findings and progress of its two tracks of risk model development on a quarterly basis in tandem with the Quarterly Data Report (QDR) filings. Alternatively, Energy Safety could require reporting of the two tracks in its next WMP filing.

Public reporting by SDG&E is critical because, as Cal Advocates has noted regarding past WMP filings, SDG&E has failed to provide complete updates on efforts or studies done to improve its risk models in subsequent years' WMP.[20] The proposed developments will impact the calculation of the PSPS risk and will include PSPS risk as part of the mitigation selection framework of the model in the next WMP cycle. Quarterly reports will enable Energy Safety and other stakeholders to better understand the inputs that contribute to SDG&E's mitigation selection decision-making.

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[16] SDG&E's 2025 WMP Update at 62.

[17] SDG&E's 2025 WMP Update at 44.

[18] SDG&E's 2025 WMP Update at 42-44.

[19] SDG&E's 2025 WMP Update at 44.

[20] Cal Advocates Comments on 2023 to 2025 WMPs at 66-69. Cal Advocates provided comments related to SDG&E's efforts to incorporate its Vegetation Risk Index into its WiNGS-Operations model.

For these reasons, Energy Safety should require SDG&E to report on the results and findings related to the two exploratory tracks on a quarterly basis, or at least as part of the 2026-2028 comprehensive WMP. Additionally, SDG&E should report on its ability to move forward with the implementation of the developmental tracks if not all research has been concluded by the submission date of the 2026-2028 comprehensive WMP.

SDG&E should submit the findings of these two exploratory tracks in SDG&E's 2026-2028 WMP submission. SDG&E should continue reporting regularly until implementation is complete. SDG&E's reports should include, at a minimum, the following:

- Description of SDG&E's progress toward using the WiNGS-Ops PSPS risk calculation in the WiNGS-Planning mitigation selection framework;
- Explanation of the reasoning, if planned enhancements are discontinued from year to year;
- Explanation of any limitations that prevented SDG&E from moving forward with full-scale implementation (if applicable);
- Explanation of all changes related to the FireCast model percentile attributes; and
- Description of all changes in data related to the risk models outputs, to be included in an appendix to the WMP.[21]

Since wildfire risk models are a fundamental part of SDG&E's wildfire mitigation selection and planning framework, Energy Safety should require public reports on the key developments of SDG&E's wildfire risk models in the next WMP. This will enable Energy Safety and all stakeholders to understand whether SDG&E is making appropriate choices about mitigation selection, timing, and prioritization. The requirements described above will provide timely information to stakeholders, while giving SDG&E adequate time to organize the necessary information.

[21] Cal Advocates recommends that all findings and changes in data related to the two developmental exploratory tracks be reported in two separate appendices in the 2026-2028 comprehensive WMP. Cal Advocates suggests the that appendices be titled accordingly:

- Appendix A: Updates on incorporation of the WiNGS-Operations Methodology into WiNGS-Planning model, and
- Appendix B: Changes to the Annual FireCast model Output.

These appendices will promote clarity on the progress and research findings in 2024 that are specific to each exploratory track.

IV. PUBLIC SAFETY POWER SHUTOFFS (PSPS)

A. Energy Safety should require SDG&E to finish estimating the effects of covered conductor on PSPS risk (ACI SDGE-23-03).

SDG&E defines "PSPS risk" as the total expected annualized impacts from PSPS at a specific location.[22] This risk is highly dependent on the topology of each circuit.[23] SDG&E's WiNGS-Planning model estimates a PSPS risk score based on the likelihood and consequence of a PSPS event.[24, 25] While a PSPS event can be beneficial in that it may mitigate wildfire risk, it creates challenges and potential harms to customers because the outage may last several hours to several days.

ACI SDGE-2023-03 requires SDG&E to describe how it prioritizes PSPS risk in its risk-based decisions, including trade-offs between wildfire risk and PSPS risk.[26] SDG&E states that it does not utilize PSPS risk estimates for the selection of appropriate mitigations because wildfire risk is typically much greater than PSPS risk.[27]

SDG&E provides a plan to address each circuit segment that is in the riskiest five percent (ranked by wildfire risk) by 2031.[28] However, for the comparable list of riskiest circuit segments in terms of PSPS risk, SDG&E does not identify any specific mitigations for PSPS risk.[29]

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[22] SDG&E's 2023 WMP at 61

[23] SDG&E's 2023 WMP at 61.

[24] PSPS Likelihood of Risk Event (PSPS LoRE) "is estimated as the annual frequency of a risk event in a given year." SDG&E's 2025 WMP Update at 45.

[25] PSPS Consequence of Risk Event (PSPS CoRE) "is estimated based on the Multi-Attribute Value Function (MAVF) and is based on the consequence of a PSPS de-energization occurring with respect to the expected duration of the de-energization and the number and types of customers that would be affected." SDG&E's 2025 WMP Update at 63.

[26] Energy Safety's Decision on SDG&E's 2023-2025 Wildfire Mitigation Plan, October 13, 2023, at 81:

> In the required Area for Continued Improvement (ACI) SDGE-23-03 (PSPS and Wildfire Risk Trade-Off Transparency), SDG&E must describe: (1) How it prioritizes PSPS risk in its risk-based decisions, including trade-offs between wildfire risk and PSPS risk; and (2) How the rank order of its planned mitigation initiatives compares to the rank order of mitigation initiatives ranked by risk buy-down estimate, along with an explanation for any instances where the order differs.

[27] SDG&E's response to DR CalAdvocates-SDGE-2025WMP-06, question 6a, April 17, 2024.

[28] SDG&E's 2025 WMP Update at 48-49. Table 10 (Ranking of Planned Mitigation Initiatives) shows the circuit segments in SDG&E's top 5% wildfire risk and their planned mitigation measures.

[29] SDG&E's 2025 WMP Update at 6-7. Table 2 shows SDG&E's Top 5% PSPS Risk Circuits/Segments/Spans.

SDG&E states only that wildfire risk mitigation is the primary driver in its grid hardening efforts, though it tries to reduce PSPS impacts and maximize PSPS benefits.[30]

Further, SDG&E only considers sectionalizing devices[31] and strategic undergrounding[32] as mitigations for PSPS risk.[33] SDG&E remains noncommittal on how covered conductor could reduce PSPS risk.[34] In its 2023-2025 WMP, SDG&E states that covered conductor "has the potential to raise the threshold for PSPS events to higher wind speeds compared to bare conductor hardening" and that it expected "to complete covered conductor testing and finalize this threshold by December 2023."[35] SDG&E has completed its covered conductor testing but still has not updated its internal documentation to implement higher wind speed thresholds for fully covered circuit segments.[36]

Energy Safety should require SDG&E to revise and resubmit its 2025 WMP Update, specifically the response to ACI SDGE-23-03. SDG&E should provide a timeline and the specific steps needed to determine how covered conductor reduces PSPS risk. SDG&E should also revise its wind speed thresholds for circuits with covered conductor. Thus, when SDG&E does incorporate PSPS risk into its WiNGS-Planning model (as discussed in section III of these comments), SDG&E's mitigation selection process will appropriately consider covered conductor also as an option for PSPS risk mitigation.

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[30] SDG&E's response to DR CalAdvocates-SDGE-2025WMP-06, question 6b, April 17, 2024.

[31] SDG&E 2023 WMP at 177. "SDG&E installs PSPS Sectionalizing Devices to break up a circuit to reduce the scope of a PSPS de-energization (e.g., number of customers affected or duration of de-energization event)."

[32] SDG&E 2023 WMP at 155-157. "SDG&E performs Strategic Undergrounding by converting overhead systems to underground systems. SDG&E considers circuit segments that are fully undergrounded back to the substation to no longer have a PSPS risk."

[33] SDG&E's response to DR CalAdvocates-SDGE-2025WMP-06, question 6b, April 17, 2024. "SDG&E considers some programs (Microgrids, Standby Power Program, Generator Grant Program, and Generator Assistance Program) as able to reduce PSPS impacts to customers but not to reduce PSPS risk."

[34] SDG&E's response to DR CalAdvocates-SDGE-2025WMP-06, question 4c, April 17, 2024. "Increasing the covered conductor wind speed threshold is expected to have some effect on PSPS risk reduction, but the exact reduction is unknown at this time."

[35] SDG&E's 2023 WMP at 155.

[36] SDG&E's response to DR CalAdvocates-SDGE-2025WMP-06, question 4b and 4c, April 17, 2024. SDG&E states that it has one fully covered circuit segment and plans to implement higher wind speed thresholds for this circuit segment before its peak fire season but does not know what the exact reduction to PSPS risk will be.

V. ASSET MANAGEMENT AND INSPECTIONS

A. Energy Safety should require SDG&E to correct shortcomings related to QA/QC of asset inspections (ACI SDGE-23-13).

SDG&E's QA/QC program serves as a "secondary assessment for conditions identified during inspection" to validate the results of an inspection performed.[37] SDG&E's methodology reflected a perfect 100 percent pass rate for its distribution overhead detailed inspections, because SDG&E assumed any observed discrepancies had arisen during the time period between the original inspection and the QC check.[38] In comments submitted in 2023, Cal Advocates identified concerns related to SDG&E's Quality Assurance and Quality Control (QA/QC) program on its asset inspections.[39]

In its final decision on SDG&E's 2023-2025 WMP, Energy Safety found that SDG&E did not adequately capture findings when determining QA/QC pass rates for inspections.[40] In ACI SDGE-23-13, Energy Safety required SDG&E to conduct an analysis and explain how it planned to augment its current QA/QC audit program in its 2025 WMP Update.[41]

SDG&E's WMP Update does not comply with ACI SDGE-23-13 in two areas. First, SDG&E discusses how it has augmented its QA/QC program but not how its findings during QA/QC audits inform SDG&E's inspections moving forward.[42] SDG&E should have addressed "feedback loops, analysis of potential trends, and updates needed for training or procedures."[43]

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[37] SDG&E 2023-2025 Base WMP Redlined, April 2, 2024 at 231.

[38] Cal Advocates Comments on 2023 to 2025 WMPs at 70-72.

[39] *Comments of the Public Advocates Office on the 2023 to 2025 Wildfire Mitigation Plans of the Large Investor-Owned Utilities*, May 26, 2023, (Cal Advocates Comments on 2023 to 2025 WMPs) at 70.

[40] Final Decision on SDG&E's 2023-2025 WMP at 87.

[41] Final Decision on SDG&E's 2023-2025 WMP at 87. As part of ACI SDGE-23-13, SDG&E's required progress included "Describe how it has augmented its current QA/QC program to include desktop and direct field review and/or demonstrate that drone inspections adequately cover QA/QC for detailed inspections."

[42] SDG&E's 2025 WMP Update at 99-100.

[43] SDG&E's 2025 WMP Update at 99.

Second, SDG&E fails to provide QA/QC pass/fail rates for 2021 through 2023, as directed by Energy Safety's final decision on SDG&E's 2023-2025 WMP.[44, 45]

As explained in greater detail below, Energy Safety should require SDG&E to correct these two deficiencies.

1. SDG&E proposes significant changes to its QA/QC process for asset inspections.

In 2023, Cal Advocates noted that SDG&E's 100 percent accuracy rate appeared to be a byproduct of its recordkeeping procedure rather than flawless performance by SDG&E's personnel and contractors.[46] To comply with ACI SDGE-23-13, SDG&E's 2025 WMP Update proposes two changes. First, SDG&E updates the frequency for QA/QC of distribution detailed inspections. Second, SDG&E plans to change the type of targets for QA/QC audit inspections. SDG&E initially reported data from QA/QC audit inspections in the form of an inspection count (the total number of structures that SDG&E conducted QC inspections on) but will be transitioning to report a pass/fail rate (a percentage of issues identified during QC audit inspections).[47]

To accompany this change in targets, SDG&E also plans to modify the timing of when it conducts its QA/QC audits of the distribution detailed inspection program and its sampling procedure:

> In the current QA/QC of the Distribution Inspection program (WMP .491) audits typically occur within 3 months of the inspection. … Going forward, the program will be enhanced by having supervisors assess 50% of the issues identified during inspection within 1 month and document the results of those assessments. In addition, 5% of inspections will be audited by quality control personnel via field visits and desktop review… within 1 month of the completed section.[48]

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[44] Final Decision on SDG&E's 2023-2025 WMP, at 87. Energy Safety required SDG&E to "Provide data analysis on work orders found during QA/QC audits of asset inspections from 2021 to 2023, including the total number of findings and the rate of these findings."

[45] SDG&E's 2025 WMP Update at 100.

[46] Cal Advocates Comments on 2023 to 2025 WMPs at 70-72.

[47] SDG&E's 2025 WMP Update at 29.

[48] SDG&E's 2025 WMP Update at 100.

Shortening the audit period from three months to one month is a positive step. Additionally, SDG&E plans to audit a 5 percent sample of inspections, which is an improvement from the 0.5 percent – 1.5 percent sample under SDG&E current practices.[49] However, SDG&E fails to consider the potential unintended consequences of these changes. A shorter audit period could lead to SDG&E conducting more audit inspections over a period of the year and could increase the number of new maintenance issues SDG&E needs to address. It is also possible that prompt audits will result in fewer audit findings, which would mean the number of maintenance issues stays on par with past years. Additionally, increasing the size of the QC sample is likely to result in more findings and increased maintenance work. Other utilities have failed to appropriately plan for increased maintenance as a result of inspection changes, resulting in growing backlogs of overdue maintenance.[50]

The significant changes in QA/QC timing, scope and targets may create a sudden influx of inspection findings and associated new work orders, and Cal Advocates is concerned that SDG&E has not planned for such an occurrence.

2. Remedy: Energy Safety should require SDG&E to explain how it will address the impacts of changing its QA/QC process.

Energy Safety should direct SDG&E to revise its 2025 WMP Update to more fully address changes in its asset inspection QA/QC process. In its revised WMP, SDG&E should examine the potential consequences and trends that may arise from the proposed changes to its QA/QC process. In particular, SDG&E should detail its actions to prepare for a potential increase in maintenance tags. SDG&E should provide the following information:

- Once the new QA/QC processes have been implemented, whether SDG&E has observed an increase in the number of inspection findings and associated new work orders due to its new QA/QC audit practices; and

[49] SDG&E 2023-2025 Base WMP Redlined, April 2, 2024 at 232.

[50] For example, SCE states that its total number of asset work orders has increased due to changes in its inspection practices:

> The overall number of notifications due between 2020-2022 increased by 14% from the years 2017-2019 due to changes in SCE's inspection processes, such as inclusion of aerial inspections, increased inspections in HFRA, and enhanced detailed inspections.

SCE 2025 Wildfire Mitigation Plan Update at 72.

- If there is an increase in the number of inspection findings, how SDG&E plans to address the increased maintenance workload.

While SDG&E does explain how it will augment the QA/QC of the distribution detailed inspections program moving forward, SDG&E fails to provide any analysis of potential trends due to the change in its QA/QC process. It is essential to require SDG&E to provide an analysis of the potential impacts of its changing QA/QC process, as that will allow Energy Safety and stakeholders to review and provide feedback on areas that could have been overlooked by the utility.

3. SDG&E does not plan to report pass/fail rates for QA/QC until 2025.

ACI SDGE-23-13 directs SDG&E to "provide data analysis on work orders found during QA/QC audits of asset inspections from 2021 to 2023, including the total number of findings and the rate of these findings."[51] SDG&E does not provide calculated pass/fail rates for 2021 to 2023. Instead, the 2025 WMP Update reiterates that "due to the time between inspections and audit activity, there is no way to determine whether results of the audit were present at the time of inspection."[52] In response to discovery, SDG&E also states that it will not report a pass/fail rate for overhead detailed inspections for 2024 because it will not transition to performing audits within 1 month following the inspection until 2025.[53, 54] While SDG&E could report a pass/fail rate using its current 3-month window in 2024, SDG&E states "because there is a potential that infractions or issues arise during the three-month period between the inspection and audit, assigning using a pass/fail designation could be inaccurate."[55]

SDG&E's proposal to begin reporting a pass/fail rate in 2025 raises several concerns. First, it does not comply with ACI SDGE-23-13. Second, although SDG&E recognizes the basic

[51] Final Decision on SDG&E's 2023-2025 WMP at 87.

[52] SDG&E's 2025 WMP Update at 100.

[53] SDG&E's response to data request CalAdvocates-SDGE-2025WMP-07, question 1(a), April 24, 2024.

[54] SDG&E's response to data request CalAdvocates-SDGE-2025WMP-07, question 1(b), April 24, 2024. SDG&E states that it will use the 2024 calendar year to allow for the development of staffing, technology, and process changes to implement the change.

[55] SDG&E's response to data request CalAdvocates-SDGE-2025WMP-07, question 1(a), April 24, 2024.

invalidity of its QA/QC results, it does not intend to change its practices until 2025.[56], [57] Third, SDG&E's failure to report any data for 2024 will leave Energy Safety and the Commission with insufficient information to evaluate the efficacy of SDG&E's current inspection efforts or to analyze trends over time.

4. Remedy: Energy Safety should require SDG&E to report interim pass/fail rates for QA/QC in 2024.

To rectify this issue, Energy Safety should require SDG&E to report interim pass/fail rates for asset inspection QA/QC in 2024. Energy Safety should also require SDG&E to report its data for 2023, as directed in ACI SDGE-23-13.[58] Although SDG&E may not fully phase-in the new one-month audit window in 2024, SDG&E should report the data that it currently has based on its current QA/QC process. SDG&E should report its pass/fail rates for each quarter, via the QDR filings. This data will provide a baseline to compare future years' data and help track trends. Cal Advocates has included an example table to illustrate how SDG&E should report data, which can be found in Appendix A.

These reports on pass/fail rates would allow intervenors and regulators to analyze the data that SDG&E has presently and track SDG&E's efforts to improve its QA/QC inspections. SDG&E's "interim" pass/fail rate will likely have limitations, due to the current timing of SDG&E's QC audits. Nonetheless, the recommendations above will improve transparency regarding SDG&E's QA/QC programs and will allow Energy Safety and stakeholders to track progress.

VI. CONCLUSION

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

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[56] SDG&E's response to data request CalAdvocates-SDGE-2025WMP-05, question 6(d), April 17, 2024.

[57] SDG&E's response to data request CalAdvocates-SDGE-2025WMP-07, question 1(b), April 24, 2024. "SDG&E is anticipating implementing he change from the 3-month time period to the 1-month time period in 2025."

[58] Final Decision on SDG&E's 2023-2025 WMP at 87. "Provide data analysis on *work orders found during QA/QC audits of asset inspections from 2021 to 2023*, including the total number of findings and the rate of these findings (i.e., percentage of structures that had work orders opened during QA/QC audit)." (emphasis added)

Respectfully submitted,

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Appendix A: Proposed QA/QC Pass/Fail Rate Reporting Table

Results of QC Audits on Asset Inspections				
	Q1	Q2	Q3	Q4
Number of inspection QC audits completed within 1 month window				
Audits completed within 1 month window that passed				
Audits completed within 1 month window that failed				
Pass rate in 1-month window (%)				
Number of inspection QC audits completed between 1 and 3 months				
Audits completed between 1 and 3 months that passed				
Audits completed between 1 and 3 months that failed				
Pass rate between 1 and 3 months (%)				