



May 31, 2024

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**SUBJECT: Office of Energy Infrastructure Safety Decision on San Diego Gas & Electric Company's Change Order Request in relation to its 2023-2025 Base Wildfire Mitigation Plan**

Mr. Skopec:

The Office of Energy Infrastructure Safety (Energy Safety) has evaluated San Diego Gas & Electric Company's (SDG&E's) change order request pertaining to its 2023-2025 Base Wildfire Mitigation Plan (WMP) pursuant to the 2023-2025 WMP Process and Evaluation Guidelines (Dec. 6, 2022).<sup>1</sup> Energy Safety approves in part and rejects in part SDG&E's change order request.

On October 13, 2023, Energy Safety approved<sup>2</sup> SDG&E's 2023-2025 Base WMP.<sup>3</sup> SDG&E submitted a change order request on November 1, 2023.<sup>4</sup> SDG&E submitted a revised change

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<sup>1</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Dec. 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true, accessed Jan. 30, 2024).

<sup>2</sup> [Decision on 2023-2025 Wildfire Mitigation Plan San Diego Gas & Electric Company \(Oct. 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55782&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55782&shareable=true, accessed Jan. 31, 2024).

<sup>3</sup> SDG&E originally submitted its 2023-2025 WMP on March 27, 2023. As required by Energy Safety, SDG&E submitted a final version of its 2023-2025 WMP on October 25, 2023, that includes all previously submitted errata: [2023-2025 SDGE WMP with Attachments \(Oct. 23, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (document dated Oct. 23, 2023; document submitted to the docket Oct. 25, 2023) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true, accessed Jan. 31, 2024).

<sup>4</sup> [SDG&E 2023 Change Order Report \(Nov. 1, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55887&shareable=true) and [Attachment](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55888&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55887&shareable=true; https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55888&shareable=true, both accessed Jan. 31, 2024).

order request on December 19, 2023.<sup>5</sup> No stakeholders commented on SDG&E's initial or revised change order request.

Below, Energy Safety provides a summary of its determination for each of the requested changes. Energy Safety evaluated the requested changes pursuant to the criteria set forth in Section 12 of the 2023-2025 WMP Process and Evaluation Guidelines. In executing its WMP, should an electrical corporation deviate from its approved plan, it will have the opportunity to explain or justify such deviations during the compliance process.

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<sup>5</sup> [SDG&E 2023 Change Order Report \(Dec. 19, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56078&shareable=true) and [Attachment](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56079&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56078&shareable=true; https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56079&shareable=true, both accessed Jan. 31, 2024).

Table 1. Determinations for SDG&amp;E’s Requested Changes

SDG&E Initiative ID and Title	Change Requested	Determination	Rationale
<b>Covered Conductor (WMP.455)</b>	SDG&E proposes to reduce its 2024 target from 60 miles to 40 miles.	Rejected	<p>The proposed change does not reduce risk.</p> <p>SDG&amp;E states the target change request is “due to design and engineering delays for approximately 20 miles of work due to various factors.”<sup>6</sup> The reason for the requested change is that the initial target is no longer feasible.</p> <p>This is not an allowable reason to request a change in a target.<sup>7</sup></p>
<b>Strategic Pole Replacement (WMP.1189)</b>	SDG&E proposes to increase its 2024 target from 200 to 267 poles.	Approved	The proposed change responds to an updated understanding of risk and is likely to reduce wildfire risk.

<sup>6</sup> [SDG&E 2023 Change Order Report \(Dec. 19, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56078&shareable=true) p. 5 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56078&shareable=true, accessed Feb. 22, 2024).

<sup>7</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Dec. 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true) 12.2 “Criteria for a Change Order Request” states “Electrical corporations should not request approval for...changes to approach or targets exclusively because full implementation may not be feasible” (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true, accessed Jan. 30, 2024).

SDG&E Initiative ID and Title	Change Requested	Determination	Rationale
<b>Distribution Infrared Inspections (WMP.481)</b>	SDG&E proposes to reduce its 2024 target from 9,532 <sup>8</sup> to 300 structures.	Rejected	The proposed change does not reduce risk.
<b>Wireless Fault Indicators (WMP.449)</b>	SDG&E proposes to reduce its 2024 target from 300 to 0 wireless fault indicators.	Rejected	<p>The proposed change does not reduce risk.</p> <p>SDG&amp;E states that the target change request is because it is “pausing this program due to manufacturer upgrades to the currently used fault indicators.”<sup>9</sup> The reason for the requested change is that the initial target is no longer feasible.</p> <p>This is not an allowable reason to request a change in a target.<sup>10</sup></p>

<sup>8</sup> [2023-2025 SDGE WMP with Attachments \(Oct. 23, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) OEIS Table 8-4 “Asset Inspections Targets by Year,” p. 145 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true, accessed May 24, 2024).

<sup>9</sup> [SDG&E 2023 Change Order Report \(Dec. 19, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56078&shareable=true) p. 6 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56078&shareable=true, accessed Feb. 22, 2024).

<sup>10</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Dec. 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true) 12.2 “Criteria for a Change Order Request” states “Electrical corporations should not request approval for...changes to approach or targets exclusively because full implementation may not be feasible” (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true, accessed Jan. 30, 2024).

SDG&E Initiative ID and Title	Change Requested	Determination	Rationale
<b>Distribution Communications Reliability Improvements (WMP.549)</b>	SDG&E proposes to reduce its 2024 target from 60 to 15 base stations.	Rejected	The proposed change does not reduce risk.  SDG&E states that the target change request is “due to a change in timing.” <sup>11</sup> The reason for the requested change is that the initial target is no longer feasible.  This is not an allowable reason to request a change in a target. <sup>12</sup>
<b>Air Quality Index (WMP.970)</b>	SDG&E proposes to reduce its 2024 target from 6 <sup>13</sup> to 0 sensors.	Rejected	This request falls outside the initiative categories to which change orders apply. <sup>14</sup>

<sup>11</sup> [SDG&E 2023 Change Order Report \(Dec. 19, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56078&shareable=true) p. 6 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56078&shareable=true, accessed Feb. 22, 2024).

<sup>12</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Dec. 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true) 12.2 “Criteria for a Change Order Request” states “Electrical corporations should not request approval for...changes to approach or targets exclusively because full implementation may not be feasible” (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true, accessed Jan. 30, 2024).

<sup>13</sup> [2023-2025 SDGE WMP with Attachments \(Oct. 23, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) OEIS Table 8-23 “Situational Awareness Initiative Targets by Year,” p. 297 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true, accessed May 24, 2024).

<sup>14</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Dec. 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true) 12.2 “Criteria for a Change Order Request” pp. 22-23 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true, accessed Feb. 22, 2024).

SDG&E Initiative ID and Title	Change Requested	Determination	Rationale
<b>Standby Power Program (Fixed Backup Power) (WMP.468)</b>	SDG&E proposes to reduce its 2024 target from 300 to 58 generators.	Rejected	The proposed change does not reduce risk. The change in implementation approach (regarding the generator type) is not a significant strategic change.
<b>Microgrids (WMP.462)</b>	SDG&E proposes to reduce its 2024 target from 4 <sup>15</sup> to 1 microgrid.	Rejected	<p>The proposed change does not reduce risk.</p> <p>SDG&amp;E states that the target change request is “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.”<sup>16</sup> The reason for the requested change is that the initial target is no longer feasible.</p> <p>This is not an allowable reason to request a change in a target.<sup>17</sup></p>

<sup>15</sup> [2023-2025 SDGE WMP with Attachments \(Oct. 23, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) OEIS Table 8-3 “Grid Design, Operations, and Maintenance Targets by Year,” p. 143 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true, accessed May 24, 2024).

<sup>16</sup> [SDG&E 2023 Change Order Report \(Dec. 19, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56078&shareable=true) p. 8 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56078&shareable=true, accessed Feb. 22, 2024).

<sup>17</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Dec. 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true) 12.2 “Criteria for a Change Order Request” states “Electrical corporations should not request approval for...changes to approach or targets exclusively because full implementation may not be feasible” (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true, accessed Jan. 30, 2024).

SDG&E Initiative ID and Title	Change Requested	Determination	Rationale
<b>Weather Station Maintenance and Calibration (WMP.447)</b>	SDG&E proposes to reestablish this initiative.	Rejected	This request falls outside the initiative categories to which change orders apply. <sup>18</sup>  Additionally, this is not a significant change to a mitigation initiative described in SDG&E’s WMP. <sup>19</sup>

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<sup>18</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Dec. 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true) 12.2 “Criteria for a Change Order Request” pp. 22-23 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true, accessed Feb. 22, 2024).

<sup>19</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Dec. 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true) 12.2 “Criteria for a Change Order Request” states “An electrical corporation must request approval from Energy Safety if it is making any significant change to a mitigation initiative described in its WMP or WMP Update...” (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true, accessed Jan. 30, 2024).

### **Summary and Next Steps**

Energy Safety approves one of SDG&E's nine requests, affecting the following initiative:

- Strategic Pole Replacement (WMP.1189)

In accordance with the 2023-2025 WMP Process and Evaluation Guidelines, SDG&E must include the approved change to this target in future submissions to Energy Safety, including quarterly data reports.

Additionally, SDG&E must revise its 2023-2025 Base WMP to reflect the approved change to the Strategic Pole Replacement target for 2024 and submit the revised WMP to the 2023-2025 WMP docket no later than Friday June 7, 2024. This revised 2023-2025 Base WMP must represent the WMP approved by Energy Safety on October 13, 2023, with only the Strategic Pole Replacement target for 2024 changed. It must not include the updates provided in SDG&E's 2025 WMP Update submitted to Energy Safety on April 2, 2024, or any other changes not approved by this Change Order Decision.

Sincerely,



Suzie Rose  
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Office of Energy Infrastructure Safety