SDGE™

FINAL INDEPENDENT EVALUATOR 2023 ANNUAL REPORT ON COMPLIANCE

JUNE 30, 2024

BUREAU VERITAS

C2 GROUP®

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1. EXECUTIVE SUMMARY

Derived from the devastating wildfires of the past and the present, we continue to learn more about what is our task to ensure the safety of California lands as it relates to the presence of electrical infrastructure within the wildland. California Public Utilities Commission (CPUC) opened Rulemaking 18-10-007 to provide guidance on the Investor-Owned Utilities (IOU) Wildfire Mitigation Plans (WMPs). The WMP's are developed to span three (3) years, with the first cycle of WMP independent evaluation starting in 2020.

The 2023 year of WMP is the 2nd cycle of the three (3) year planning. During the final evaluation of the first 3-year plan which ended in 2022 SDG&E did not experience any ignition events or conditions that would trigger a PSPS situation. SDG&E's 2023 to 2025 plan builds on the previous cycle by focusing on enhancements of data analytics and modeling capabilities, technological advancements with assessment studies for various strategies for mitigating wildfire and PSPS risk, and PSPS events and preparedness. Overall, it was observed from the previous year that reportable ignitions in the High Fire Threat Districts (HFTD) and High Fire Risk Areas (HFRA) within SDG&E's service area was reduced.

This Independent Evaluator (IE) Annual Report of Compliance is an assessment of SDG&E's 2nd cycle plan that began in 2023 and extends to 2025. This report provides a review of the WMP initiatives demonstrated in the 2023 plan and accounting for SDG&E's performance in meeting with their commitment of objective targets including specific quantifiable or qualitative performance goals and targets, verification of QA/QC program implementation, process, and results; and the distribution of funding to initiatives so described within the WMP.

Pursuant to P.U. Code Section 8386.3(c)(2)(B)(i), (ii), (iii), (iv), Bureau Veritas North America, Inc. (BVNA) has been selected as the IE to review and assess SDG&E's 2023 WMP in its entirety. This report will outline BVNA findings and results for review. The Office of Energy Infrastructure and Safety (OEIS) Independent Evaluator List for 2023 Wildfire Mitigation Plans document dated February 27th, 2024, and reference to Public Utilities Code section 8386.3(c)(2)(A) included BVNA in the list of qualified IEs. In conformance with Energy Safety's requirements, SDG&E Electric Service, Inc. executed a contract with BVNA to provide the IE assessment which include the IE responsibilities outlined in the Public Utilities Code section 8386.3(c)(5)(C) for performance of the following tasks:

- Task 1 – Consult with Energy Safety on compliance assurance auditing that will be performed,
- Task 2 – Perform compliance assurance auditing, including field inspections,

- Task 3 – Draft and provide to Energy Safety a report on audit findings, including deficiencies of underfunded WMP activities
- Task 4 – Draft and provide to Energy Safety a report on deficiencies of electrical corporations, and
- Task 5 – Track and report deficiencies of audit findings.

Docket Title: 2023 to 2025 Electrical Corporation Wildfire Mitigation Plans Docket #; 2023-2025-WMPs for SDG&E Electric Service Inc. October 23, 2023, WMP and the requirements of the Public Utilities Code (PU Code); Bureau Veritas North America, Inc. (BVNA), in partnership with C2 Group, have reviewed SDG&E's 2023 WMP.

Key Findings

SDG&E's 2023 WMP underscores a steadfast commitment to advancing wildfire mitigation through strategic innovation, enhanced risk management, and continued stakeholder collaboration through lessons learned from the previous 3-year cycle of the Wildfire Mitigation planning. Building on the successes of previous years, the 2023 WMP focuses on integrating cutting-edge technologies, refining risk assessment methodologies, and reinforcing community and regulatory partnerships. SDG&E continues to lead in wildfire mitigation by implementing comprehensive measures to reduce fire risks and improve system resilience. The utility's proactive approach encompasses extensive system hardening, advanced situational awareness, and an enhanced vegetation management program.

The progress made in wildfire mitigation initiatives aligns with the strategic objectives of the 2023 WMP. Key projects in risk assessment, system hardening, asset management, and emergency planning have been successfully implemented. SDG&E has met or exceeded several large-volume quantifiable goals, demonstrating the effectiveness of its mitigation strategies. SDG&E has also maintained strong partnerships with local stakeholders and regulatory bodies, ensuring a collaborative approach to wildfire mitigation.

This report presents a thorough analysis, drawing on comprehensive research, data reviews, and observations across the initiatives reviewed. The detailed findings in the subsequent sections provide a comprehensive overview of SDG&E's performance in meeting its 2023 WMP objectives. This includes specific quantifiable and qualitative performance goals, verification of QA/QC programs, and funding allocation to targeted initiatives.

The IE has included a few key findings from the IE's review of the 2023 SDG&E WMP initiatives in this section, including examples that exemplify the successes of SDG&E's 2023 to fulfill work exceeding the stated goals as well as initiatives that were in progress but not

met due to various external factors as noted within this report and per SDG&E's **Annual Report on Compliance** (ARC) and **Quarterly Data Report** (QDR) Q4 reporting.

- **8.1.6.5 – WMP.1194 – QA/QC Substations**
  Initiative WMP.1194 under the Wildfire Management Plan (WMP) pertains to the Quality Assurance and Quality Control (QA/QC) of substation inspections, as detailed in Section 8.1.6.5. This section specifies that substation patrol inspections are periodically reviewed by a Construction Supervisor to ensure compliance with regulatory requirements and internal standards. The process involves reviewing a sample of inspections to identify any deficiencies and provide real-time training for inspectors. The total of 23 QA/QC inspections exceeds the target goal of 18 inspections. The initiative aligns with SDG&E's 2023 strategy of providing oversight to programs within their vast list of WMP initiatives.

- **8.1.3.4 – WMP.482 – Transmission Infrared Inspections**
  Data was gathered to assess initiative WMP.482 to section 8.1.3.4 of SDG&E's WMP, describing the use of infrared technology for infrastructure inspections per regulatory requirements. These annual inspections utilize infrared technology to examine the radiation emitted by connections to determine if there are potential issues before failure, reducing the amount of potentially defective equipment on the electric system, minimizing hazards and maintaining system reliability. A spreadsheet of 6,077 Transmission Infrared Inspections was provided, each inspection individually distinguished by Facility ID representing a structure along with insightful interviews with SDG&E SME's. The quantity of 6,077 inspections completed falls short of the 6,179 targeted in the 2023 WMP, but based on the IE findings the initiative is substantially met.

- **8.1.2.2 – WMP.473 – Strategic Undergrounding**
  SDG&E committed to complete 84 miles of strategic undergrounding in 2023, however 70 miles of strategic undergrounding was completed in 2023. In the ARC for the 2023 WMP, SDG&E reports that progress on this initiative was affected by multiple factors including permit approval, easement acquisition, material lead times, weather conditions, customer property access, and design changes due to customer requests and field conditions.

- **8.1.2.5.2 - WMP.545 - Transmission OH Hardening – DUB**
  SDG&E committed to complete 7.1 miles of transmission overhead hardening for distribution underbuild. 17.9 miles of transmission overhead hardening for distribution underbuild was completed in 2023 exceeding the target by 152%. SDG&E identified that availability of resources and favorable weather conditions

contributed to exceeding the target for this initiative. This initiative aligns with SDG&E's 2023 strategy of transmission system hardening.

- **8.1.2.10.2 - WMP.1189 - Strategic Pole Replacement**
  SDG&E committed to replace 60 poles under the strategic pole replacement initiative in 2023. 1 pole was replaced for strategic pole replacement in 2023. In the ARC for the 2023 WMP, SDG&E reports that progress on this initiative was affected by delays with onboarding engineering and design consultants for the 2023 scope of work.

- **8.1.4.4 – WMP.459 – Expulsion Fuse Replacement**
  SDG&E committed to replacing 40 expulsion fuses in 2023. 36 expulsion fuses were replaced in 2023. In the ARC for the 2023 WMP, SDG&E reports that progress on this initiative was affected by material shortages and production delays.

2. INTRODUCTION

In an ongoing process, the Wildfire Safety Division (WSD) of the Wildfire Safety Advisory Board (WSAB) publishes recommendations for Investor-Owned Utilities (IOUs) to be addressed in the three (3) year cycle of WMPs. A review of all documents supporting the implementation of the 2023 WMP strategic initiatives has been conducted. BVNA, in partnership with C2 Group, has provided the following IE evaluation report (Report) describing the technical review and findings.

Founded in 1881 and headquartered in San Diego SDG&E is a regulated public utility that provides energy service. SDG&E is a subsidiary of Sempra Energy, a Fortune 500 Company. SDG&E supplies power across twenty-five communities to more than 3.7 million people through 1.5 million electric meters and 900,000 gas meters in San Diego and part of Orange County, with a service area spanning 4,100 square miles. Of these miles, 69% are located within the HFTD.

SDG&E's vast infrastructures consist of federal-jurisdictional transmission, distribution, substations, and generation. The federal-jurisdictional transmission consists of 1,993 circuit miles. Of this, 1,037 are within the HFTD. The distribution infrastructure consists of 17,467 circuit miles with 6,190 across the HFTD. Included in the substations are 134 distribution and 24 transmissions for a total of 158 electric. Within these SDG&E operates and maintains 7 synchronous condensers, 321 power transformers, 2,443 circuit breakers, and 263 capacitor banks. There are four power generating plants in the territory operating; Palomar Energy Center – 588-megawatt gas-fired combined cycle plant, Miramar Energy Facility – 92-megawatt peaking plant, Cuyamaca Peak Energy Plant – 45-megawatt peaking plant, and Desert Star Energy Center – 480 megawatt combined-cycle plant in Boulder City, NV.

Figure 1: Map of SDG&E's Service Territory

3. INDEPENDENT EVALUATOR REVIEW OF COMPLIANCE

BVNA and the C2 Group have been chosen as SDG&E's IE and is tasked with evaluating SDG&E's 2023-2025 WMP. The following assessment outline is based upon SDG&E's completion of proposed initiatives, distribution of funding, and verification of quality assurance and quality control program depicted during 2023 yearly progress. The overall approach to verify compliance included the review and assessment of the multiple WMP activities through data requests, Subject Matter Expert (SME) interviews, review of publicly available documents, and conducting field assessments within SDG&E's service area to documented and validated aspects detailed and outlined in SDG&E's WMP progress for 2023.

The independent evaluation commenced with an Energy Safety kick-off meeting, where BVNA/C2 staff and assigned Energy Safety Staff were introduced to SDG&E representatives. The meeting focused on establishing communication and documentation processes and protocols, as well as identifying individuals responsible for handling requests from the IE. Following the introductory meeting, the IE initiated a review of SDG&E's 2023 WMP and relevant publicly available documents (listed in the Appendices) to identify and assess SDG&E's stated goals, commitments, initiatives, and metrics outlined in the 2023 WMP, including their fulfillment of QA/QC provisions.

BVNA's understanding of common utility wildfire mitigation strategies employed throughout the state is summarized as follows:

1. **Inspection and maintenance of distribution, transmission, and substation assets,** including conducting system patrols and ground inspections using technological inspection tools, managing predictive and electrical preventative maintenance, conducting vegetation inspections and management, vulnerability detection such as Light Detection and Ranging (LiDAR) inspection, and geospatial and topography identification and geographic information system (GIS) mapping data. A key component is identifying collected data elements through each program and understanding how that data is used and shared to improve utility practices.
2. **Vegetation management,** including routine preventative vegetation maintenance; corrective vegetation management and off-cycle tree work; emergency vegetation clearance, prioritized for portions of the service territory in Tier 2 and 3 HFTD; quality control processes; and resource protection plan, including animal and avian mitigation programs. Enhanced Vegetation Management (EVM) with enhanced inspections, aims to keep all aspects of trees away from power lines and to prescribe minimum clearances that exceed state standards. EVM implements frequencies of inspection beyond the routine patrols to address dead, diseased or dying trees from power lines where they can do no harm.

3. **System hardening** includes pole replacement, non-expulsion equipment, advanced fuses, tree attachment removal, less flammable transformer oil, covered wire and wire wrap, and undergrounding where it is supported by a cost benefit analysis.
4. **Operational practices,** including communications and executing plans under varying degrees of wildfire risk. Plans to deactivate automatic reclosers, de-energization of "at risk" area power lines based on the type of facility (overhead bare conductions, high voltage, etc.), tree and vegetation density, available dry fuel, and other factors that make specific locations vulnerable to wildfire risk.
5. **Situational awareness** includes obtaining information from devices and sensors on the actual system, weather, and other wildfire conductivity conditions and two-way communication with agencies and key personnel. Application of risk informed, and data supported decision making. Programs such as online feeds and websites such as the National Fire Danger Rating System are utilized. Situational awareness should help achieve a shared understanding of actual conditions and serve to improve collaborative planning and decision-making.
6. **De-Energization** actions triggered and prioritized by forecasted extreme fire weather conditions: imminent extreme fire weather conditions; validated extreme fire weather conditions; and plans for re-energization when weather subsides to safe levels. Manual or automatic capabilities exist for implementation.
7. **Advanced Technologies** include Distribution Fault Anticipation technology, tree growth regulators, pulse control fault interrupters, oblique and hyperspectral imagery, advanced transformer fluids, advanced LiDAR, and advanced Supervisory Control and Data Acquisition (SCADA) to reduce electrical ignition while also helping to mitigate power outages and equipment damage.
8. **Emergency Preparedness, Outreach, and Response communications before, during, and after emergencies,** including but not limited to engaging with key stakeholders that include critical facilities and served customers, local governments, critical agencies such as the California Department of Forestry and Fire Protection (CAL FIRE), local law enforcement agencies and other first responders, hospitals, local emergency planning committees, other utility providers, and California Independent System Operators. Coordination agreements such as Mutual Aid or Assistance should be leveraged. A community outreach plan should inform and engage first responders, local leaders, land managers, business owners, and others.

For those activities described in the WMP but not available within the publicly available records, BVNA's team of evaluators submitted data requests and conducted SME interviews to verify activities stated within the 2023 initiative list for the 2023-2025 WMP (See Appendix C for Data Requests Submitted and Responses). Along with the document analysis, data requests, and SME interviews, the IE conducted field assessments within HFTP Tier 2 and Tier 3 areas to collect images and evaluate compliance with the 2023 activities or initiatives identified during the IE initial review. The analysis and key findings for each respective section are detailed further within the following sections.

3.1 WMP Activity Completion

WMP activities outlined in SDG&E's 2023 WMP are demonstrated in tables "SDGE_2023_Q4_Tables1-15_copy.xlsx." Appendix A provides a detail of the WMP activities and their grouping that the IE reviewed per IE categorizations listed in this report. As described above, the WMP activity includes initiatives aligned with compliance metrics developed by WSAB. Given the extensive nature of SDG&E's asset inventory, the IE assessment of activity completion is itemized in this report's following sections. The details in Section 3.1.1, and in conjunction with Appendix A, provide a comprehensive overview of the specific verifications conducted by the IE.

3.1.1 Sampling Methodology and Discussion

BVNA IE random sampling sizing for SDG&E are based upon the ANSI Mil. Std 105E supported by Acceptable Quality Limit (AQL) as the foundational standard. Based on the selective sample sizing, the use of 2.5% defect is the acceptable level of major defective as a tolerance along with an inspection level of II as normally used. Mil-Std-105E (ANSI Z1.4) as a sampling plan begins by determining the lot size, the inspection level and then applying the appropriate table for sample size and the accept/reject criteria.

BVNA was accepted and listed as an approved IE conducting the assessment of SDG&E's yearly WMP for a (3) year cycle from 2023-2025. BVNA has utilized the referenced standard for selection of samples and evaluating acceptable error levels; but has also gained a level of confidence from the provided data and field verifiable state of SDG&E's performance in meeting with their commitment of objective targets including specific quantifiable or qualitative performance goals and targets, verification of QA/QC program implementation, process, and results; and the distribution of funding to initiatives so described within the WMP.

Large Volume Quantifiable Goal/Target – Field Verifiable

The IE applied sampling methodologies and standards to program targets to ensure the sampling quantities were statistically acceptable. When SDG&E's actual quantity of completed work exceeded the amount targeted, the greater and 'actual' number was used when determining the field review sample quantities. According to the standard, general inspection level two should be used and was applied as the default inspection level unless otherwise specified. See Table 1: Program Sampling Methodology Summary for Large Volume Quantifiable Goal/Target Field Verifiable that summarizes the individual program targets, actuals, sampling methodologies/standards, and the IE sample size/target.

The IE conducted field inspections assessing compliance for work completion, work quality, and adherence to applicable protocols and procedures. The IE field sample targets are

minimums, and larger sample numbers were obtained when possible. In addition, the IE has made data requests on these program targets to review, where applicable, standards, as-builts, and relevant QA/QC program documentation. This multi-faceted approach supports verification results extrapolated across sample populations.

The IE assessed the following six (6) items provided as part of SDG&E's 2023 WMP's list of initiatives under section **3.1.2.1 Large Volume Quantifiable Goal/Target - Field Verifiable.**

Table 1: Program Sampling Methodology Summary for, Large Volume Quantifiable Goal/Target – Field Verifiable

Program	Units	Sections	Sampling Standard	SDG&E Target[1]/Actual[2]	IE Field Sample Target
Avian Protection	Poles	8.1.2.10.1 - WMP.972	ANSI/ ASQ Z1.4	200 / 657	80
Hotline Clamps	HLC	8.1.4.5 - WMP.464	ANSI/ ASQ Z1.4	250 / 962	80
Lightning Arrestor Replacement	Arrestors	8.1.4.6 - WMP.550	ANSI/ ASQ Z1.4	1,848 / 2,216	125
Fuels Management Program	Poles Cleared	8.2.3 - WMP.497	ANSI/ ASQ Z1.4	500 / 514	80
Pole Clearing (brushing)	Poles Brushed	8.2.3.1 - WMP.512	ANSI/ ASQ Z1.4	33,010 / 35,258	500
Clearance (enhanced trim or remove)	Trees	8.2.3.3 - WMP.501	ANSI/ ASQ Z1.4	11,200 / 13,419	315

[1] SDG&E's Targets reported per SDG&E's 2023-2025 Wildfire Mitigation Plan Dated October 23, 2023.

[2] SDG&E's Actuals reported per SDG&E's 2023 WMP ARC, dated April 1, 2024, and SDG&E's Quarterly Data Reporting dated February 1, 2024.

Large Volume Quantifiable Goal/Target – Not Field Verifiable

Similar to the Large Volume Quantifiable Goal/Target Field Verifiable noted previously, the IE applied the same sampling methodologies and standards to program targets to ensure the sampling quantities were statistically acceptable. When SDG&E's actual quantity of completed work exceeded the amount targeted, the greater and 'actual' number was used when determining the sample quantities. According to the standard, general inspection level two should be used as indicated above in Section 3.1.1. See Table 2: Program Sampling Methodology Summary for Large Volume Quantifiable Goal/Target Not Field Verifiable that summarizes the individual program targets, actuals, sampling methodologies/standards, and the IE sample size/target.

The IE made initial data requests on these program targets to review the work completed and identify and request completion records for the sample size in conformance with the sampling methodology described herein. The IE has also made data requests on these program targets to review, where applicable, standards, as-builts, and relevant QA/QC program documentation.

The IE assessed the following 18 items provided as part of SDG&E's 2023 WMP's list of initiatives under section **3.1.2.2 Large Volume Quantifiable Goal/Target - Not Field Verifiable.**

Table 2: Program Sampling Methodology Summary, Large Volume Quantifiable Goal/Target – Not Field Verifiable

Program	Units	Sections	Sampling Standard	SDG&E Target[1]/Actual[2]	IE Sample Standard Target/ Reduced Target
Fixed Power Backup	Generators	8.1.2.11.2 - WMP.468	ANSI/ ASQ Z1.4	300/ 362	50
Distribution OH Detailed	Inspections	8.1.3.1 - WMP.478	ANSI/ ASQ Z1.4	11,100/ 11,755	315
Transmission OH Detailed Inspections	Structures	8.1.3.2 - WMP.479	ANSI/ ASQ Z1.4	2,387/ 1,928	125
Distribution Infrared	Inspections	8.1.3.3 - WMP.481	ANSI/ ASQ Z1.4	9,578 / 11,900	315
Transmission Infrared Inspections	Structures	8.1.3.4 - WMP.482	ANSI/ ASQ Z1.4	6,179/ 6,077	200
Distribution Woodpole Intrusive	Inspections	8.1.3.5 - WMP.483	ANSI/ ASQ Z1.4	50/ 1038	8
Distribution Drone Assessments	Poles	8.1.3.7 - WMP.552	ANSI/ ASQ Z1.4	13,692 / 15,311	315
Distribution OH Patrols	Inspections	8.1.3.8 - WMP.488	ANSI/ ASQ Z1.4	86,880/ 85,857	500
Transmission OH Inspections (visual - helo patrol)	Structures	8.1.3.9 - WMP.489	ANSI/ ASQ Z1.4	6,337/ 6,200	200
Additional Inspections (69kV TLs in Tier 3)	Structures	8.1.3.10 - WMP.555	ANSI/ ASQ Z1.4	1,632/ 1,602	125

Substation Inspections	Inspections	8.1.3.11 - WMP.492	ANSI/ ASQ Z1.4	384/ 396	50
Secondary Inspections of Transmission (QA/QC)	Structures	8.1.6.1 - WMP.1191	ANSI/ ASQ Z1.4	100/ 97	20
QA/QC Distribution Detailed	Inspections	8.1.6.2 - WMP.491	ANSI/ ASQ Z1.4	160 / 150	20
QA/QC Distribution Drone	Inspections	8.1.6.3 - WMP.1192	ANSI/ ASQ Z1.4	13,692 / 15,311	315
Detailed Inspections	Trees	8.2.2.1 - WMP.494	ANSI/ ASQ Z1.4	485,400 / 514,626	500
VM Off-Cycle Patrol (strike potential)	VMAs	8.2.2.2 - WMP.508	ANSI/ ASQ Z1.4	106/ 106	20
QA/QC Vegetation Management	Inspections	8.2.5 - WMP.505	ANSI/ ASQ Z1.4	79,441 / 106,041	500
Wireless Fault Indicators	N/A	8.3.3.1 - WMP.449	N/A	N/A	N/A

[1] SDG&E's Targets reported per SDG&E's 2023-2025 Wildfire Mitigation Plan Dated October 23, 2023.
[2] SDG&E's Actuals reported per SDG&E's 2023 WMP Annual Report on Compliance (ARC) dated April 1, 2024 and SDG&E's Quarterly Data Reporting dated February 1, 2024.

Small (less than 100 times) Volume Quantifiable Goal/Target

Similar to the Large Volume Quantifiable Goal/Target Not Field Verifiable noted previously, the IE applied the same sampling methodologies and standards to program targets to ensure the sampling quantities were statistically acceptable. When SDG&E's actual quantity of completed work exceeded the amount targeted, the greater and 'actual' number was used when determining the sample quantities. According to the standard, general inspection level two should be used as indicated above in Section 3.1.1. See Table 3: Program Sampling Methodology Summary for Small (less than 100 times) Volume Quantifiable Goal/Target that summarizes the individual program targets, actuals, sampling methodologies/standards, and the IE sample size/target.

The IE made initial data requests on these program targets to review the work completed and identify and request completion records for the sample size in conformance with the sampling methodology described herein. The IE has also made data requests on these program targets to review, where applicable, standards, as-builts, and relevant QA/QC program documentation.

The IE assessed the following 17 items provided as part of SDG&E's 2023 WMP's list of initiatives under section **3.1.2.3 Large (less than 100 times) Volume Quantifiable Goal/Target.**

Table 3: Program Sampling Methodology Summary for Small (less than 100 times) Volume Quantifiable Goal/Target

Program	Units	Sections	Sampling Standard	SDG&E Target[1]/Actual[2]	IE Sample Target
DIST OH Hardening - Covered Conductor	Miles	8.1.2.1 - WMP.455	ANSI/ ASQ Z1.4	60/ 60	20
Strategic Undergrounding	Miles	8.1.2.2 - WMP.473	ANSI/ ASQ Z1.4	84 / 70	20
DIST OH Hardening - Traditional Hardening	Miles	8.1.2.5.1 - WMP.475	ANSI/ ASQ Z1.4	1.9 / 2.33	2.33
Transmission OH Hardening	Miles	8.1.2.5.2 - WMP.543	ANSI/ ASQ Z1.4	14/ 16	3
Transmission OH Hardening - DUB	Miles	8.1.2.5.2 - WMP.545	ANSI/ ASQ Z1.4	7 / 17	5
Advanced Protection	Circuits	8.1.2.8.1 - WMP.463	ANSI/ ASQ Z1.4	5/ 4	2
Early Fault Detection	Nodes	8.1.2.8.2 - WMP.1195	ANSI/ ASQ Z1.4	60/ 32	20
LTE Communication Network (DCRI)	Base Stations	8.1.2.8.3 - WMP.549	ANSI/ ASQ Z1.4	35/ 11	8
Strategic Pole Replacement	Poles	8.1.2.10.2 - WMP.1189	ANSI/ ASQ Z1.4	60 / 1	1
Sectionalizing Devices	Switches	8.1.2.11.1 - WMP.461	ANSI/ ASQ Z1.4	10/ 10	3
Transmission Wood Pole Intrusive Inspections	Miles	8.1.3.6 - WMP.1190	ANSI/ ASQ Z1.4	73/ 90	20
SCADA Capacitors	Capacitors	8.1.4.3 - WMP.453	ANSI/ ASQ Z1.4	15 / 20	5
Expulsion Fuse Replacement	Fuses	8.1.4.4 - WMP.459	ANSI/ ASQ Z1.4	40 / 36	5
QA/QC Wood Pole Intrusive (Dist & Trans)	Inspections	8.1.6.4 - WMP.1193	ANSI/ ASQ Z1.4	12/ 122	3
QA/QC Substations	Inspections	8.1.6.5 - WMP.1194	ANSI/ ASQ Z1.4	18/ 23	5

Air Quality Index	Sensors	8.3.2.1.3 - WMP.970	ANSI/ ASQ Z1.4	6 / 6	5
Microgrids	N/A	8.1.2.7 - WMP.462	N/A	N/A	N/A

[1] SDG&E's Targets reported per SDG&E's 2023-2025 Wildfire Mitigation Plan Dated October 23, 2023.
[2] SDG&E's Actuals reported per SDG&E's 2023 WMP Annual Report on Compliance (ARC) dated April 1, 2024, and SDG&E's Quarterly Data Reporting dated February 1, 2024.

Sampling Distribution

The IE conducted an independent site selection process to determine sample locations for field verifications taken from the populated data for each initiative and applied Random Sampling across SDG&E's territory. In all cases, sampling was targeted within HFTD Tiers 2 and 3 areas. Further, it targeted high-density areas to improve field inspection efficiency and maximize sampling quantities.

Sample sizes and their analysis were adequate for a general understanding of the reviewed items. The sample sizes over time allotments are insufficient to provide a definite accounting of item qualities or miles stated within SDG&E's 2023 WMP targets. However, as requested in the Final IE Scope of Work document, general and linear extrapolations and deductions were made from the sample size results, which were distributed as defined within this document. These included the actual installation or removal of the item (work completion), general work quality, adherence to protocols, standards, and procedures, and item location or confirming operational outputs.

See Figure 2: Overview of Areas Sampled, which provides a general overview of the locations sampled within Section 3.1.2.1 Large Volume Quantifiable Goal/Target - Field Verifiable.

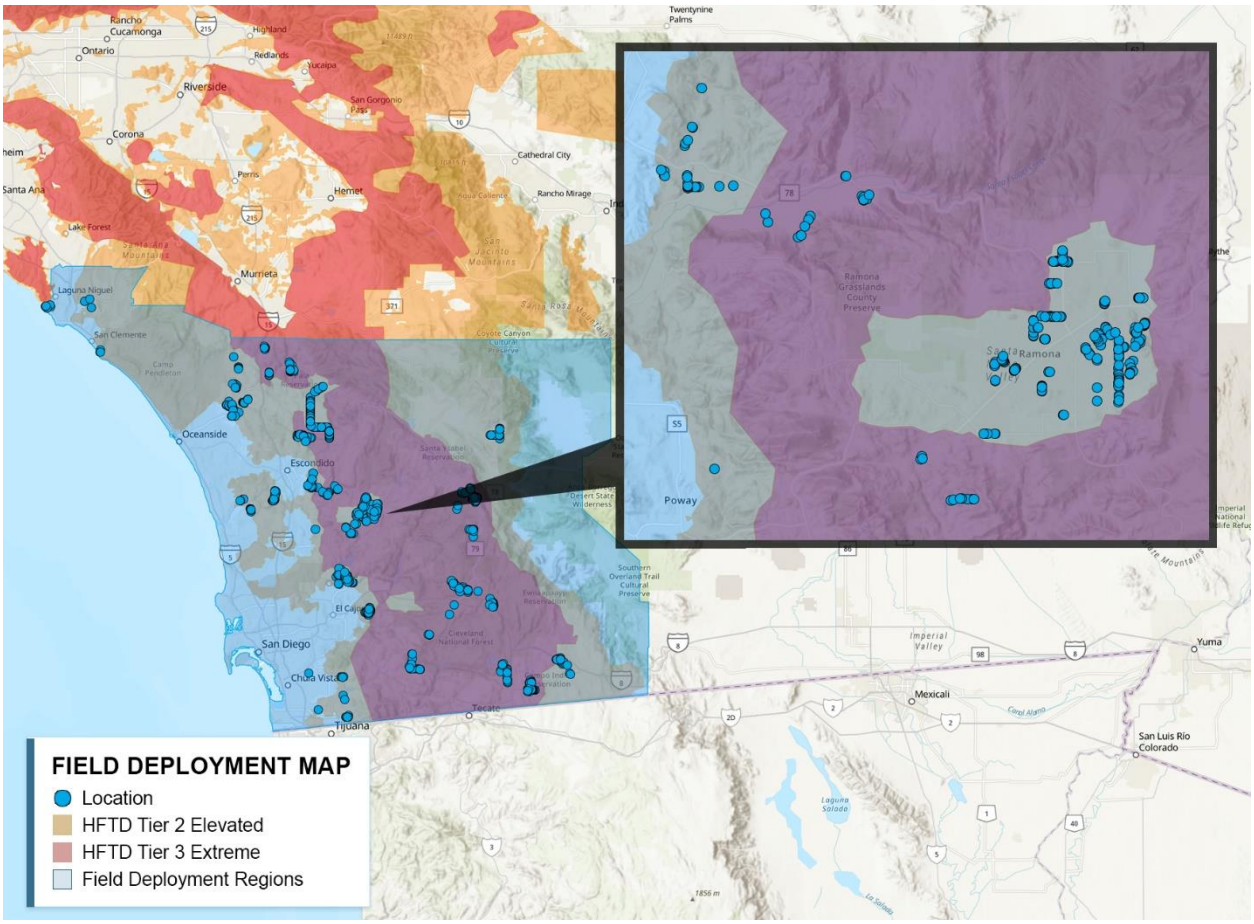


Figure 2: Overview of Field Areas Sampled

3.1.2 Review of Initiatives

3.1.2.1 Large Volume Quantifiable Goal/Target – Field Verifiable

The following information comprises detailed descriptions of the IE's assessments of SDG&E's various initiatives categorized as Large Volume Quantifiable Field Verifiable. The approach to assessing each initiative, along with the IE's findings, are described in this section.

8.1.2.10.1 - WMP.972 - Avian Protection

The Avian Protection Program, which involves installing protective equipment on distribution poles to prevent bird electrocution and adhere to Federal and State laws aims to reduce the risk of faults and wire-down events related to bird contact that could lead to fires and improve reliability. The need for concurrent installation of avian protection with projects like clamp replacements, fuse replacements, and lightning arrestor replacements became apparent due to increased work in the High Fire Threat District (HFTD). Without concurrent installation, the risk of bird contact persists, potentially necessitating future pole visits, causing additional outages or customer impacts. Risk reduction was estimated using historical data and the planned number of Avian Protection installations. With the installation of avian covers, a 90% reduction in wildfire ignitions is anticipated, based on field observations in Tier 3 areas as shown in SDG&E Table 8-8: Risk Reduction Estimation for Avian Covers of the 2023 WMP.

SDG&E committed to installing 200 units of avian protection equipment in 2023, per OEIS Table 8-3: Grid Design, Operations, and Maintenance Targets by Year from the 2023 WMP. SDG&E's goal to install 200 units of avian protection equipment was met and exceeded by 457 units, installing a total of units of 657 units of avian protection equipment, per SDG&E's self-reporting within the 2023 Q4 QDR, dated February 1, 2024, provided in DR002. The program definition of installation is defined in Section 8.1.2.10.1 Avian Protection Program of the 2023 WMP. The IE field assessment team utilized the California Power Line Fire Prevention Guide, 2021 Edition, as their ruling document to validate equipment installations (Pages 123-127, Figures PLC-15 through PLC-26). For illustrative examples of these observations, please refer to Figure 3: Example Avian Protection Field Images, provided below.

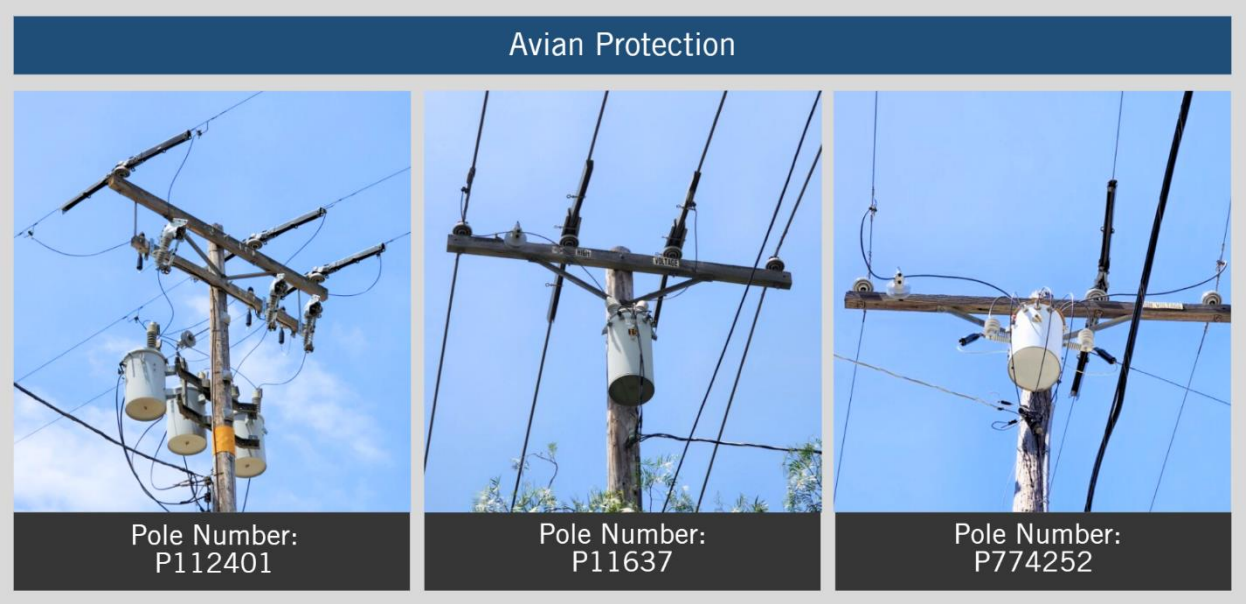


Figure 3: Example Avian Protection Field Images

From the confidential response DR002, the IE randomly sampled and verified 145 avian protection equipment installation locations. The IE's target goal of 80 field verified locations was exceeded by 66, for a total of 145 sampled sites. 143 were found to be in compliance with the initiative, and two (2) of the sampled locations, or 1.4% of the sampled structures, were found to be out of compliance. The following non-compliance issues were identified during the field assessment as shown in Figures 4 and 5.

- One (1) structure had no avian protection installed on pole at time of audit.
- One (1) structure had avian protection that had separated and slid approximately 50-ft down the line.

Figure 4: No Avian Protection Installed

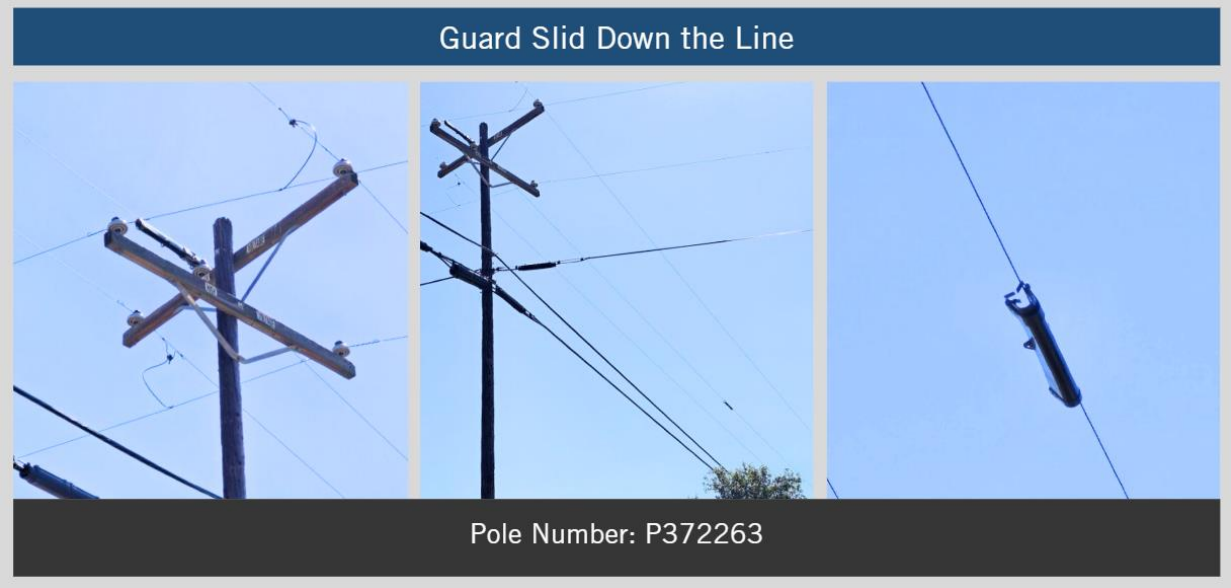


Figure 5: Guard Slid Down the Line

Based on the IE's verification sample and results, it appears likely that SDG&E met its stated commitment to install 200 units of avian protection equipment and exceeded 457 units for a total of 657 units of avian protection equipment being installed, as reported.

8.1.4.5 - WMP.464 - Hotline Clamps

The replacement of hotline clamps with approved, or compliant, connectors eliminate the risk of wire-down failures and the associated ignition risk. Risk reduction was estimated using historical data and the planned number of hotline clamp replacements. With the replacement of hotline clamps, a 90% reduction in wildfire ignitions is anticipated, based on field observations in HFTD areas as shown in SDG&E Table 8-27: Risk Reduction Estimation for the HLC Program of the 2023 WMP.

SDG&E committed to replacing 250 direct connected hotline clamps attached to primary conductor with compression connections & exempt hardware in 2023, per OEIS Table 8-3: Grid Design, Operations, and Maintenance Targets by Year from the 2023 WMP. SDG&E's goal to replace 250 hotline clamps was met and exceeded by 712 units, replacing 962 hotline clamps with exempt compression connectors and hardware, per SDG&E's self-reporting within the 2023 Q4 QDR Dated February 1, 2024, provided in DR002.

The program definition of replacement is defined in Section 8.1.4.5 Hotline Clamp Replacement Program of the 2023 WMP. The IE field assessment team utilized the California Power Line Fire Prevention Guide, 2021 Edition, as their ruling document to validate Exempt equipment installations (Pages 101-108, Figures B-54 through B-74) vs. Non-Exempt (Pages 68-70, Figures NE-29 through NE-37). For illustrative examples of these observations, please refer to Figure 6: Example Hotline Clamp Replacement Field Images, provided below.

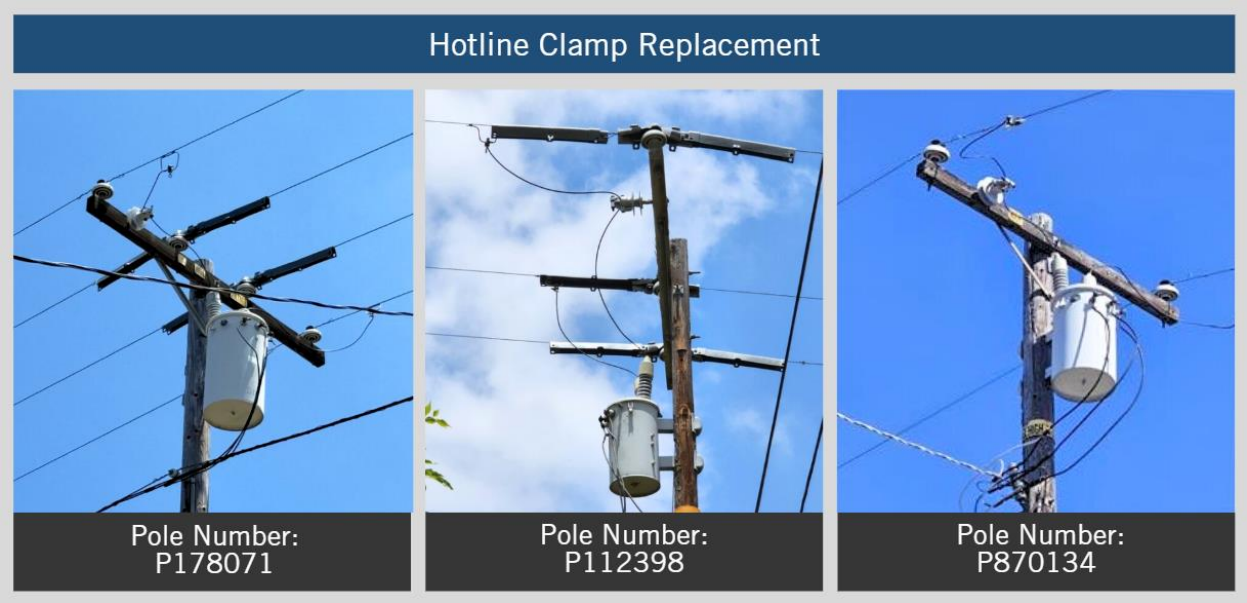


Figure 6: Example Hotline Clamp Replacement Field Images

From the confidential response DR002, the IE verified a sample of 121 direct connected hotline clamp replacement locations to be replaced with exempt equipment. The IE's target goal of 80 was exceeded by 41, for a total of 121 sampled sites. All 121 sampled locations complied with the initiative and completed the removal and replacement of direct connected hotline clamps. Based on the IE's verification sample and results, it appears likely that SDG&E met its stated commitment to remove and replace 250 direct connected hotline clamps with exempt compression connectors and hardware and exceeded 712 units for a total of 962 hotline clamps replaced, as reported.

Field assessments of the hotline clamp replacements were reviewed for workmanship quality and accuracy of information. No issues were identified and based on the assessment of the hotline clamp replacements initiative; the work quality is satisfactory.

8.1.4.6 - WMP.550 - Lightning Arrestor Replacement

Lightning arrestors are electrical devices designed to lessen the impact of transient overvoltage on the electrical system. However, if overloaded, these units can potentially become ignition sources. To mitigate this risk, a new type of lightning arrestor, approved by CAL FIRE, has been introduced. These arrestors have an external device (Spark Prevention Unit or SPU) that operates before overload, significantly lowering the chances of becoming an ignition source. As part of the Lightning Arrestor Replacement Program, these devices started to be installed in 2021, strategically within the High Fire Threat District (HFTD).

The risk reduction was estimated using a variety of data, including past events caused by lightning arrestors, their effectiveness, and the planned number of installations. Based on the technology's design, an estimated 80% reduction in ignitions is expected. As a result, by the end of 2025, a decrease of 0.134 and 0.029 ignitions in Tier 3 and Tier 2 HFTDs, respectively, is anticipated as shown in SDG&E Table 8-28: Risk Reduction Estimation for Lightning Arrestor Program of the 2023 WMP. SDG&E committed to removing or replacing 1,848 lightning arrestors in 2023, per OEIS Table 8-3: Grid Design, Operations, and Maintenance Targets by Year from the 2023 WMP. SDG&E's goal to remove or replace 1,848 lightning arrestors was met and exceeded by 368 units, replacing 2,216 lightning arrestor removal or replacements, per SDG&E's self-reporting within the 2023 Q4 QDR, dated February 1, 2024, provided in DR002.

The program definition of removal is defined in Section 8.1.3.6 Lightning Arrestor Removal and Replacement of the 2023 WMP. The IE field assessment team utilized the California Power Line Fire Prevention Guide, 2021 Edition, as their ruling document to validate Exempt equipment installations (Pages 113-114, Figures B-86 through B-88) vs. Non-Exempt (Pages 63-67, Figures NE-19 through NE-28). For illustrative examples of these observations, please refer to Figure 7: Example Lightning Arrestor Replacement Field Images, provided below.

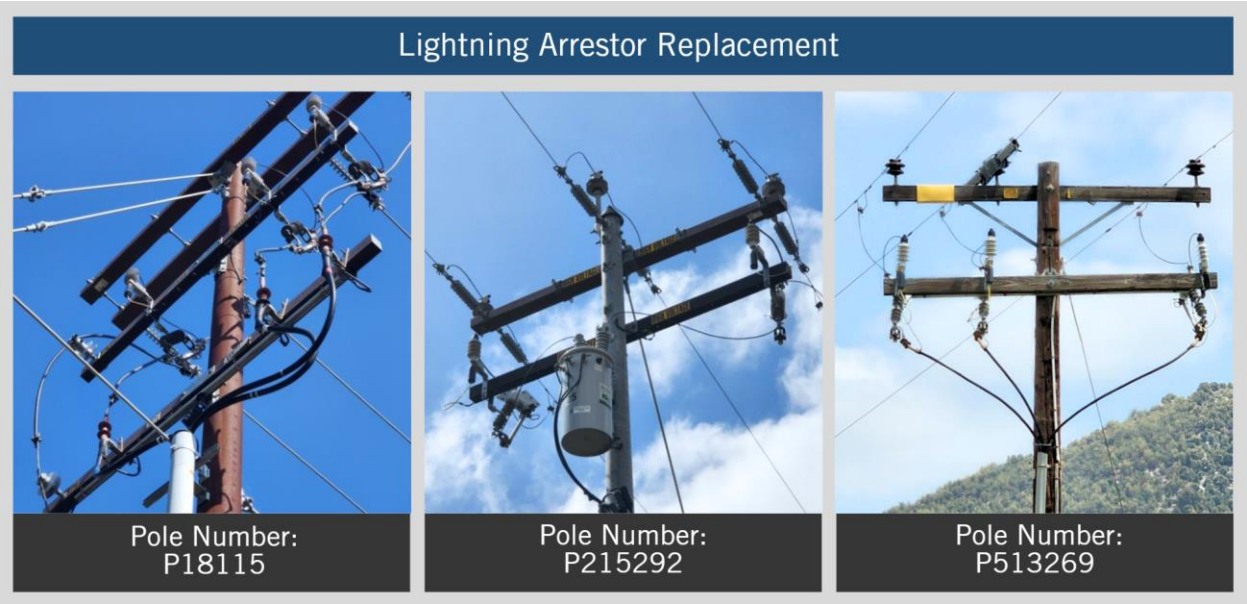


Figure 7: Example Lightning Arrestor Replacement Field Images

The IE verified a sample of 135 lightning arrestor locations to be replaced with exempt equipment. The IE's target goal of 125 was exceeded by 10 for a total 135 sampled sites. All 135 sampled locations complied with the initiative and completed the removal of non-exempt equipment and replacement with exempt equipment. Based on the IE's verification sample and results, it appears likely that SDG&E met its stated commitment to remove and replace 1,848 non-exempt lightning arrestors and exceeded 368 units for a total of 2,216 non-exempt lightning arrestors being replaced, as reported.

Field assessments of the Lightning Arrestor removal and replacements were reviewed for workmanship quality and accuracy of information. No issues were identified and based on the assessment of the Lightning Arrestor replacements initiative; the work quality is satisfactory.

8.2.3 - WMP.497 - Fuels Management Program

The Fuels Management Program is intended to protect electrical infrastructure in the event of a wildfire by thinning the vegetation surrounding structures in HFTD areas. SDG&E committed to managing the vegetation around 500 poles in 2023, per OEIS Table 8-14: Vegetation Management Initiative Targets by Year from the 2023 WMP. SDG&E's goal to manage the vegetation of 500 structures was met and exceeded by 14 structures, managing 514 structures, per SDG&E's self-reporting within the 2023 Q4 QDR, dated February 1, 2024, provided in DR002.

The program definition of fuels management is defined in Section 8.2.3 Vegetation and Fuels Management of the 2023 WMP. The IE field assessment team utilized the California Power

Line Fire Prevention Guide, 2021 Edition, as their ruling document for validation of pole clearances (Pages 21-22, Figures 10 through 12) as well as hazard trees/vegetation clearances (Pages 42-52). For illustrative examples of these observations, please refer to Figure 8: Example Fuels Management Field Images, provided below.

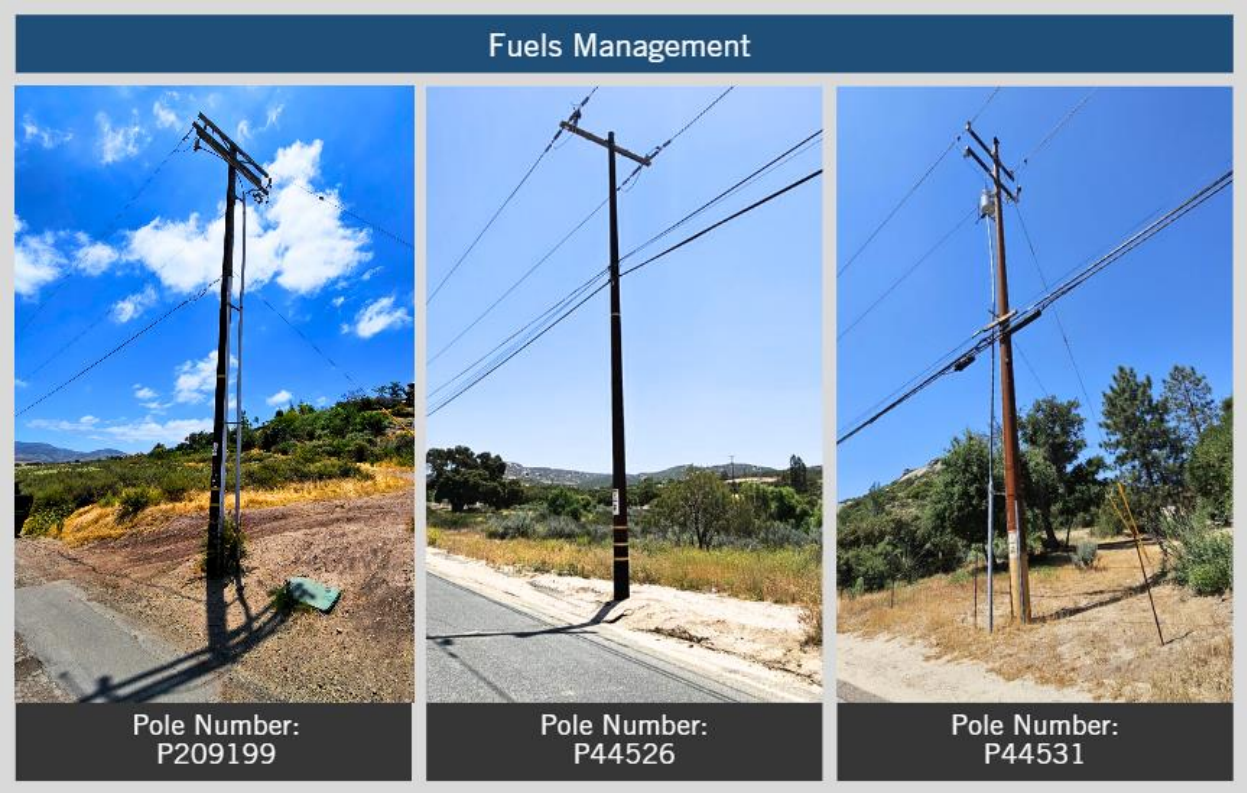


Figure 8: Example Fuels Management Field Images

From the confidential response DR002, the IE verified a sample of 84 structures. The IE's target goal of 80 was exceeded by 4, for a total of 84 sampled sites. All 84 sampled locations complied with the initiative and completed the vegetation and fuels management around the structures. Based on the IE's verification sample and results, it appears likely that SDG&E met its stated commitment to manage the vegetation of 500 structures and exceeded 14 structures for a total of 514 poles cleared, as reported.

Field assessments of the vegetation management were reviewed for workmanship quality and accuracy of information. No issues were identified and based on the assessment of the fuels management program; the work quality is satisfactory.

8.2.3.1 - WMP.512 - Pole Clearing (Brushing)

Pole clearing, or brushing, reduces the risk of ignition by clearing all vegetation around the base of the pole and in a radius around the pole. This initiative includes revisiting, and clearing, the same areas on a specific annual schedule anticipating vegetation regrowth to maintain compliance.

SDG&E committed to 33,010 pole clearings in 2023, per OEIS Table 8-14: Vegetation Management Initiative Targets by Year from the 2023 WMP. SDG&E's goal of 33,010 pole clearings was met and exceeded by 2,248 poles, for a total of 35,258 pole clearings, per SDG&E's self-reporting within the 2023 Q4 QDR Dated February 1, 2024, provided in DR002.

The program definition of pole clearing, and brushing is defined in Section 8.2.3.1 Pole Clearing of the 2023 WMP. The IE field assessment team utilized the California Power Line Fire Prevention Guide, 2021 Edition, as their ruling document for validation of pole clearances (Pages 21-22, Figures 10 through 12) as well as hazard trees/vegetation clearances (Pages 42-52). For illustrative examples of these observations, please refer to Figure 9: Example Pole Clearing Field Images, provided below.

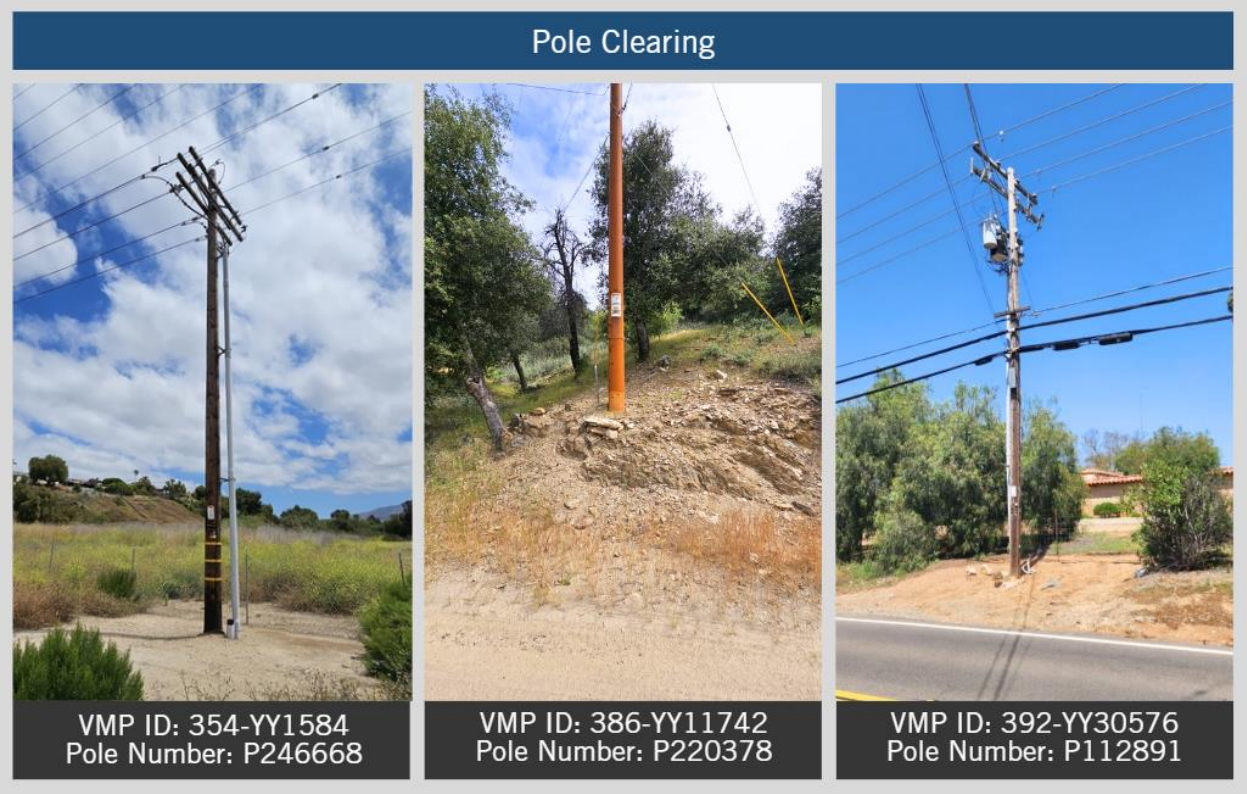


Figure 9: Example Pole Clearing Field Images

From the confidential response DR002, the IE verified a sample of 724 poles. The IE's target goal of 500 was exceeded by 224, for a total of 724 sampled sites. All 724 sampled locations complied with the initiative with the pole clearing. Based on the IE's verification sample and results, it appears likely that SDG&E met its stated commitment of 33,010 pole clearings and exceeded 2,248 poles for a total of 35,258 poles cleared, as reported. Field assessments of the pole clearings were reviewed for workmanship quality and accuracy of information. No issues were identified and based on the assessment of the pole clearings initiative; the work quality is satisfactory.

8.2.3.3 - WMP.501 - Clearance (Enhanced Trim or Remove)

Trees that are identified as higher risk are trimmed to clearances that meet the requirements of GO 95. The goal of the clearance initiative is to trim or remove trees, targeting specific species, to prevent encroachment and contact with the power lines. SDG&E committed to trimming or removing 11,200 trees in 2023, per OEIS Table 8-14: Vegetation Management Initiative Targets by Year from the 2023 WMP. SDG&E's goal to trim 11,200 trees was met and exceeded by 2,219 trees, trimming 13,419 trees, per SDG&E's self-reporting within the 2023 Q4 QDR, dated February 1, 2024, provided in DR002.

The program definition of fuels management is defined in Section 8.2.3.3 Clearance of the 2023 WMP. The IE field assessment team utilized the California Power Line Fire Prevention Guide, 2021 Edition, as their ruling document for validation of hazard tree/vegetation clearances (Pages 42-52). For illustrative examples of these observations, please refer to Figure 10: Example Clearance Field Images, provided below.

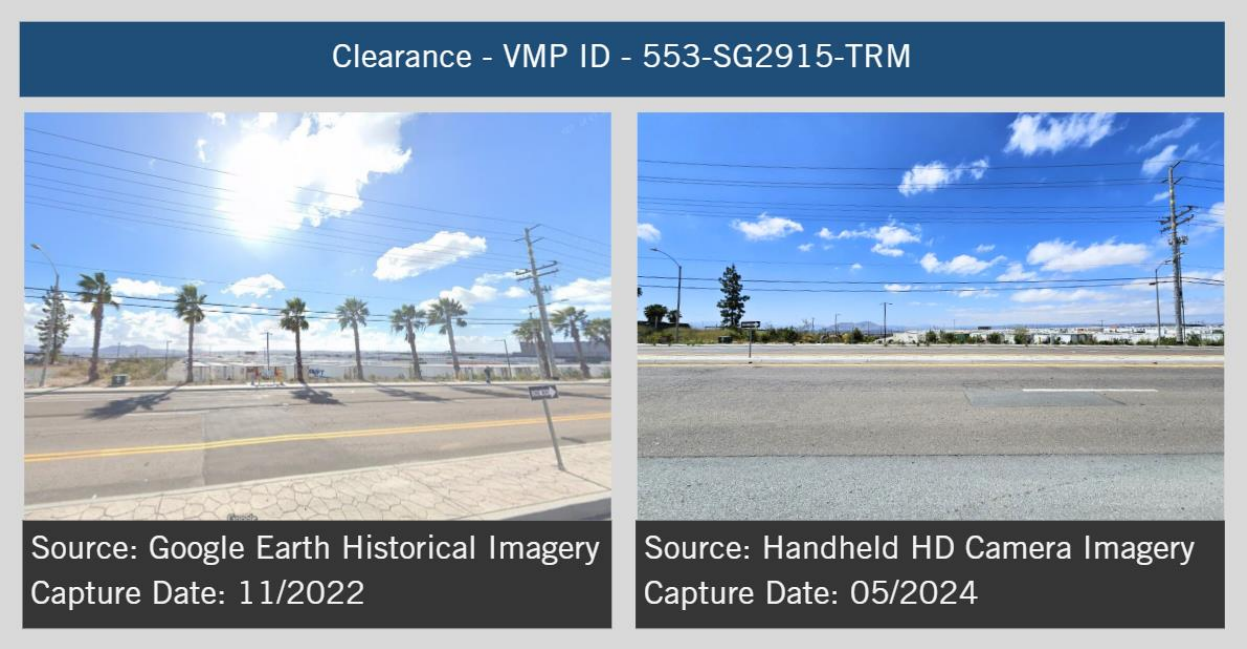


Figure 10: Example Clearance Field Images Palm Tree Removals

From the confidential response DR002, the IE verified a sample of 430 trees. The IE's target goal of 315 was exceeded by 115, for a total of 430 sampled sites. All 430 sampled locations complied with the initiative and completed the tree clearances. Based on the IE's verification sample and results, it appears likely that SDG&E met its stated commitment to trim 11,200 trees and exceeded 2,219 trees for a total of 13,419 trees cleared, as reported.

Field assessments of the tree clearances were reviewed for workmanship quality and accuracy of information. No issues were identified and based on the assessment of the clearance initiative; the work quality is satisfactory.

Summary of Initiative Findings

In addition to the Field Reviews conducted, the IE also reviewed numerous relevant documents, such as WMP-specific initiative life cycle documentation, inspection and audit records, fire rebuild design and guidance standards, design as-builts, maps, and various planning documents along with process flows. SDG&E provided the documentation in confidentiality in response to the IE's various data requests. Table 4 summarizes the IE's findings of SDG&E's program initiatives, as they were identified and reported as part of this evaluation.

Table 4: Large Volume Quantifiable Goal/Target – Field Verifiable Summary Table

Initiative Number/ID	Initiative Name	Population Size/Target	Sample Size	#, % Verified	#, % Verification Failed
WMP.972	Avian Protection	200 EA	145 EA	143, 98.6%	2, 1.4%
WMP.464	Hotline Clamps	250 EA	121 EA	121, 100%	0, 0%
WMP.550	Lightning Arrestor Replacement	1,848 EA	135 EA	135, 100%	0,0%
WMP.497	Fuels Management Program	500 EA	84 EA	84, 100%	0, 0%
WMP.512	Pole Clearing (brushing)	33,010 EA	724 EA	724, 100%	0, 0%
WMP.501	Clearance (enhanced trim or remove)	11,200 EA	430 EA	430, 100%	0, 0%

3.1.2.2 Large Volume Quantifiable Goal/Target – Not Field Verifiable

Pursuant to the Final IE Scope of Work for the Review of Compliance with 2023 WMP, SDG&E provided a complete list of all 2023 WMP activities classified as Large Volume Quantifiable Goal/Target - Not Field Verifiable completed in 2023. The IE's review and evaluation of these initiatives were completed through data request documentation from SDG&E completion of initiatives and publicly available documents, articles, and reports. These 2023 WMP activities identified within the Large Volume Not Field Verifiable list were reviewed and assessed within this section, and the findings are presented below for each initiative.

8.1.2.11.2 - WMP.468 - Fixed Power Backup

This initiative is a program to provide backup power generation during a PSPS event for rural, residential, commercial, mobile home park clubhouses by providing a fixed installation backup generator to keep customers energized during PSPS. The difference between this initiative and others under the Standby Power Program umbrella is focused on customers that do not have other grid hardening initiatives planned in their area.

The target for 2023 was 300 generators (Table 8-3, page 143, Table9-5, page 412) with validation by third party data submission. 362 Generator Inspections done in 2023 per Table 9-5 – this initiative is generators installed not generator inspections

SDG&E responses to DR014 and DR014b were –

- SDG&E Response BV DR014.pdf
- DR014_Response_20240517.xlsx
- SME Interview 20240612 via Teams with SDG&E

SDG&E DR014_Response_20240517.xlsx is a list of "generators granted" with further explanation that this list is "generators installed" (Response 1, Page 3 and SME Interview June 12, 2024). The list includes 362 entries representing the generators installed under this initiative in 2023. One of the entries lacks information identifying the asset feature and could not be verified as installed.

This initiative is met with the understanding that there were 361 generators installed.

Table 5: Fixed Power Backup Summary

Description	2023 Target	2023 Q4 QDR	DR0014 Response	Summary
Generator Installs	300 generators	362 generators	362 generators	Target met

8.1.3.1 - WMP.478 - Distribution OH Detailed

Initiative .478 of the Wildfire Management Plan (WMP) aims to ensure thorough and systematic inspections of the electric distribution system, particularly within high fire threat districts (HFTD). This initiative is grounded in Section 8.1.3.1 of the WMP, which mandates a comprehensive inspection cycle and record-keeping for utility distribution equipment, to mitigate wildfire risks by identifying and addressing potential infractions before they escalate into serious issues.

The data collected in response to DR 07 includes a spreadsheet with 11,734 Distribution Overhead Detailed Inspections, all located in HFTD 3. These inspections were categorized as detailed and ground inspections. A subset of 315 sites was randomly selected for inspection report review, resulting in a list of 327 locations with repair codes and status action codes (Cleared, pending, field cleared, or CIP pending).

Section 8.1.3.1 of the WMP specifies the Comprehensive Monitoring Program (CMP) under GO 165, requiring annual patrols and five-year detailed inspections of overhead structures in HFTD. The section outlines a systematic approach to inspections, including risk-informed drone assessments and prioritization before wildfire season. The collected data generally aligns with these requirements, demonstrating that inspections were conducted as per the WMP target. The initiative is found to be substantially met.

Table 6: Distribution OH Detailed Summary

Description	2023 Target	2023 Q4 QDR	DR007 Response	Summary
Distribution Overhead Detailed Inspections	11,100 Inspections	11,755 Inspections	11,734 Inspections	Substantially Met

8.1.3.2 - WMP.479 - Transmission OH Detailed Inspections

Data was gathered to assess initiative WMP.479 to section 8.1.3.2 of SDG&E's WMP, describing detailed overhead inspections of transmission infrastructure per regulatory requirements. SDG&E performs a service territory-wide inspection of its electric transmission system, physically visiting the structures. This allows patrollers to assess each structure for current and future maintenance requirements.

Data collected in response to requests regarding the initiative were made to evaluate progress made towards meeting the initiative targets. The data report was provided for review in utility response 20240517. A spreadsheet of 1,928 Transmission OH Detailed Inspections was provided, each inspection individually distinguished by Facility ID. This

quantity falls short of the target by 459 inspections from the target quantity of 2,387 referenced in the WMP. Based on this list, 125 inspections were randomly selected for review using ANSI Z1.4 sample size, targeting equal numbers in HFTD Tier 2 and HFTD Tier 3 locations distributed across the geographic areas. Because data could not be provided in a sharable format, there was a meeting with a subject matter expert (SME) on June 4, 2024 to review data through screen sharing.

The review covered a comprehensive examination of the report, and the SME described and explained all data points used to corroborate the information. The process to document conditions and flag the asset for repair was also demonstrated. The initial spreadsheet provided in response 20240517 documented the tracking of the inspection, including facility ID, HFTD Class, area, precise location, inspection program name, asset ID and status. The SME provided insight and screen-shared to verify the sample selection data on utility software programs.

Findings:

- 1,928 inspections were performed, conditions were identified, severity codes assigned based on the component identified, location and surrounding terrain, and severity of the condition.
- Justification for failing to meet the inspection target included lack of access, lack of permission, and weather-related complications.

With the available inspection information provided by SDG&E through data requests, the initiative has been determined to be Not Met.

Table 7: Transmission OH Detailed Inspections Summary

Description	2023 Target	2023 Q4 QDR	DR010 Response	Summary
Transmission OH Detailed Inspections	2,387 Inspections	1,928 Inspections	1,928 Inspections	Target not met

8.1.3.3 - WMP.481 - Distribution Infrared

As described within the 2023 - 2025 WMP, SDG&E's target for this initiative was to complete infrared inspections on 9,578 distribution structures to reduce the risk of equipment failure. Per SDG&E's 2023 WMP Annual Report on Compliance (ARC) dated April 1, 2024, SDG&E reported that 11,900 inspections were completed for distribution structures. SDG&E provided an initial collection of data in confidential Data Request DR002 including GIS files identifying 11,987 infrared inspections of distribution structures. In response to confidential

Data Request DR002B, SDG&E confirmed that the information provided in the GIS files is the record of completion. The IE reviewed the sample of the record data for 315 infrared inspections of distribution structures. No issues were identified in the review of the data for the infrared inspections for distribution structures.

Table 8: Distribution Infrared Summary

Description	2023 Target	2023 Q4 QDR	DR002 Response	Summary
Distribution Infrared Inspections	9,578 Inspections	11,900 Inspections	11,987 Inspections	Target Met / Exceeded by 2,409 Inspections

8.1.3.4 - WMP.482 - Transmission Infrared Inspections

Data was gathered to assess initiative WMP.482 to section 8.1.3.4 of SDG&E's WMP, describing the use of infrared technology for infrastructure inspections per regulatory requirements. The objective of this initiative is to perform infrared inspections, as scheduled, to reduce the risk of equipment failure. These annual inspections utilize infrared technology to examine the radiation emitted by connections to determine if there are potential issues before failure, reducing the amount of potentially defective equipment on the electric system, minimizing hazards and maintaining system reliability.

Data collected in response to requests regarding the initiative was made to evaluate progress made towards meeting the initiative targets. The data report was provided for review in utility response 20240517. A spreadsheet of 6,077 Transmission Infrared Inspections was provided, each inspection individually distinguished by Facility ID representing a structure. This quantity falls short of the target by 102 inspections from the target quantity of 6,179 referenced in the WMP. Based on this list, 200 inspections were selected for review using a modified ANSI Z1.4 sample size, and detailed reviews were conducted, targeting equal numbers in HFTD Tier 2 and HFTD Tier 3 locations distributed across the geographic areas. Because data could not be provided in a sharable format, there was a meeting with a subject matter expert (SME) on June 4, 2024 to review data through screen sharing.

The review covered a comprehensive examination of the report, and the SME described and explained all data points used to corroborate the information. The process to document conditions, complete a work order and flag the asset for repair was also demonstrated. The initial spreadsheet provided in response 20240517 documented the tracking of the inspection, including facility ID, HFTD Class, area, precise location, inspection program name, asset ID and status. The SME provided insight and screen-shared to verify the sample selection data on utility software programs.

Findings:

- 6,077 inspections were performed, conditions were identified, severity codes assigned based on the component identified, location and surrounding terrain, and severity of the condition.
- The number of inspections fell short of the target by 102 structures. Justification for failing to meet the target included lack of access, lack of permission, and weather-related complications.

With the available inspection information provided by SDG&E through data requests, the initiative has been determined to be Substantially Met.

Table 9: Transmission Infrared Inspections Summary

Description	2023 Target	2023 Q4 QDR	DR0009 Response	Summary
Transmission Infrared Inspections	6,179 Inspections	6,077 Inspections	6,077 Inspections	Substantially Met

8.1.3.5 - WMP.483 - Distribution Wood Pole Intrusive

Data was gathered to assess initiative WMP.483 to section 8.1.3.5 of SDG&E's WMP, describing the progress toward the testing and treatment of wood poles to look for potential deterioration and degradation over time. Poles that are thoroughly inspected and/or proactively treated to extend the service life of the asset significantly reduces safety risk to the system and public.

Data collected in response to requests regarding the initiative was reviewed to evaluate progress made towards meeting the initiative targets. A spreadsheet of 1053 distribution wood pole intrusive inspections were provided; each inspection was individually distinguished by Facility ID. The actual inspection number far exceeded the target of 50. From this list, 8 inspections were randomly selected for review based on a modified ANSI Z1.4 sample size, and a detailed review of the spreadsheet data was conducted to verify the target to the extent possible based on the data received. Both HFTD Tier 2 and HFTD Tier 3 locations were included and distributed across the geographic areas. Samples were returned in data request DR0012b.

The review covered a detailed examination of the data to ensure consistency and accuracy. The spreadsheet captured a total of 53 data fields in text-only format; images were not included. The spreadsheet documented all information associated with the inspection

through the 53 fields, including precise location (address and parcel number), district, asset ID, asset feature, findings and status.

With the available inspection information provided by SDG&E through data requests, the initiative has been determined to be Met.

Table 10: Distribution Wood Pole Intrusive Summary

Description	2023 Target	2023 Q4 QDR	DR012 Response	Summary
Distribution Wood Pole Intrusive	50 Inspections	50 Inspections	1,053 Inspections	Target met/Exceeded by 1,003 Inspections

8.1.3.7 - WMP.552 - Distribution Drone Assessments

As described within the 2023 - 2025 WMP, SDG&E's target for this initiative was to complete drone assessments of 13,692 distribution structures. Per SDG&E's 2023 WMP Annual Report on Compliance (ARC) dated April 1, 2024, SDG&E reported that 15,311 distribution poles were assessed using drones. SDG&E provided an initial collection of data in confidential Data Request DR002 including GIS files identifying 15,313 drone assessments of distribution structures. In response to confidential Data Request DR002B, SDG&E confirmed that the information provided in the GIS files is the record of completion. The IE reviewed the sample of the record data for 315 drone assessments of distribution structures. No issues were identified in the review of the data for the drone assessments.

Table 11: Distribution Drone Assessments Summary

Description	2023 Target	2023 WMP ARC Report	DR002 Response	Summary
Distribution Drone Assessments	13,692 Assessments	15,311 Assessments	15,313 Assessments	Target Met / Exceeded by 1,621 Assessments

8.1.3.8 - WMP.488 - Distribution OH Patrols

Initiative .488 aims to ensure effective distribution overhead patrol inspections, aligning with Section 8.1.3.8 of the Wildfire Management Plan (WMP). The goal is to enhance wildfire prevention measures through comprehensive patrol inspections in high fire threat districts (HFTD) Tier 2 and Tier 3 areas.

Data collected for initiative .488 included a spreadsheet containing 85,847 Distribution Overhead Patrol Inspections, indicating that all inspections were completed within HFTD 2 or HFTD 3. Detailed timelines for inspection initiation and completion provided the IE in assessing the inspection initiative and the initiative is found "Substantially Met."

Table 12: Distribution OH Patrols Summary

Description	2023 Target	2023 Q4 QDR	DR006 Response	Summary
Distribution Overhead Patrol Inspections	86,880 Inspections	85,857 Inspections	85,847 Inspections	Substantially Met

8.1.3.9 - WMP.489 - Transmission OH Inspections (Visual - Helo Patrol)

Data was gathered to assess initiative WMP.479 to section 8.1.3.9 of SDG&E's WMP, describing transmission visual patrols conducted annually by helicopter on overhead tielines per regulatory requirements. Annual inspections can help identify issues such as cracked pole tops or rust/corrosion and larger issues that can pose a fire risk or risk to public safety.

Data collected in response to requests regarding the initiative was made to evaluate progress made towards meeting the initiative targets. The data report was provided for review in utility response 20240517. A spreadsheet of 6,200 Transmission OH Patrol Inspections was provided, each inspection individually distinguished by Facility ID. This quantity falls short of the target by 137 inspections from the target quantity of 6,337 referenced in the WMP. Based on this list, 200 inspections were randomly selected for review using a modified ANSI Z1.4 sample size, targeting equal numbers in HFTD Tier 2 and HFTD Tier 3 locations distributed across the geographic areas. Because data could not be provided in a sharable format, there was a meeting with a subject matter expert (SME) on June 4, 2024 to review data through screen sharing.

The review covered a comprehensive examination of the report, and the SME described and explained all data points used to corroborate the information. The process to document conditions, complete a work order and flag the asset for repair was also demonstrated. The initial spreadsheet provided in response 20240517 documented the tracking of the inspection, including facility ID, HFTD Class, area, precise location, inspection program name, asset ID and status. The SME provided insight and screen-shared to verify the sample selection data on utility software programs.

Findings:

- 6,200 inspections were performed, conditions were identified, severity codes assigned based on the component identified, location and surrounding terrain, and severity of the condition.
- Justification for failing to meet the inspection target included lack of access, lack of permission, and weather-related complications.

With the available inspection information provided by SDG&E through data requests, the initiative has been determined to be Substantially Met.

Table 13: Transmission OH Inspections (Visual - Helo Patrol) Summary

Description	2023 Target	2023 Q4 QDR	DR008 Response	Summary
Transmission OH Patrol Inspections	6,337 Inspections	6,200 Inspections	6,200 Inspections	Substantially Met

8.1.3.10 - WMP.555 - Additional Inspections (69kV TLs in Tier 3)

Initiative .555 of the Wildfire Management Plan (WMP) mandates rigorous visual inspections of all 69 kV structures located in Tier 3 High Fire Threat Districts (HFTD) to mitigate wildfire risks. Section 8.1.3.10 of the WMP specifies the requirements and targets for these inspections, emphasizing their critical role in identifying and addressing structural issues before fire season. This report compares the data collected from SDG&E to assess compliance with the goals of initiative .555.

The data provided in response to DR 11 included a spreadsheet detailing 1,648 Transmission 69 kV Tier 3 Visual Inspections. All inspections were conducted using aerial methods via helicopter, covering geographic information for each site within HFTD 3.

Despite the alignment of the inspection data with WMP target metrics, the absence of detailed documentation and the QDR report of 1,602 inspections completed with 1,632 targeted led to a classification of compliance as "Substantially Met."

Table 14: Additional Inspections (69kV TLs in Tier 3) Summary

Description	2023 Target	2023 Q4 QDR	DR011 Response	Summary
Transmission 69 kV Tier 3 Visual Inspections	1,632 Inspections	1,602 Inspections	1,648 Inspections	Substantially Met

8.1.3.11 - WMP.492 - Substation Inspections

Initiative .492 of the Wildfire Management Plan (WMP) outlined in Section 8.1.3.11 pertains to the Substation Inspection and Maintenance Program. This program is designed to identify substation equipment deterioration and conduct necessary repairs or replacements before failures occur, thus enhancing reliability and mitigating wildfire risks within High Fire-Threat Districts (HFTD) and Wildland-Urban Interfaces (WUI). The WMP mandates routine inspections at recurring cycles, with corrective work orders generated for identified issues, to maintain operational safety and reliability.

The data provided by the utility in response to DR 13 included a spreadsheet of 396 substation patrol inspections, all conducted in HFTD 2 or HFTD 3 using ground inspection methods. A separate spreadsheet listed 76 work orders, detailing equipment types and repair measures but did not include location identifiers. The 50 PDF files of Maintenance Order Data Sheets were provided, containing field notes, generation dates, location tags, and order numbers matching the spreadsheet data.

The collected data showed that substation patrol inspections were likely conducted as required, with 396 inspections recorded. While the data generally aligned with the WMP's target metrics, the lack of photo documentation hindered full analysis of the target objectives.

Table 15: Substation Inspections Summary

Description	2023 Target	2023 Q4 QDR	DR013 Response	Summary
Substation Patrol Inspections	384 Inspections	396 Inspections	396 Inspections	Target Met

8.1.6.1 - WMP.1191 - Secondary Inspections of Transmission (QA/QC)

Initiative .1191 within the Wildfire Management Plan (WMP) is covered under Section 8.1.6.1, which pertains to Quality Assurance/Quality Control (QA/QC) of transmission inspections. This section, also referred to as secondary assessments, aims to validate the results of initial inspections to ensure accuracy and address any identified conditions. The process involves a construction supervisor performing field assessments on all identified conditions, prioritizing based on severity and High Fire-Threat District (HFTD) regions. The initiative's goal is to ensure that all identified issues are properly validated and addressed to maintain system reliability and mitigate wildfire risks.

The data provided in response to DR 16 included a spreadsheet with 182 transmission inspections, all conducted using the work order method. Each entry contained geographic information indicating locations in HFTD 2 or HFTD 3, completed by utility staff, and listed as asset inspections. The data collection for initiative .1191 shows that transmission inspections were likely conducted in line with WMP requirements, focusing on HFTD 2 and HFTD 3 regions.

Despite the spreadsheet generally aligning with WMP target metrics, the absence of detailed documentation and actual number of units less than the target goal resulted in the classification of compliance as "Substantially Met."

Table 16: Secondary Inspections of Transmission (QA/QC) Summary

Description	2023 Target	2023 Q4 QDR	DR016 Response	Summary
QA/QC of Transmission Inspections	100 Structures	97 Structures	182 locations	Substantially Met

8.1.6.2 - WMP.491 - QA/QC Distribution Detailed

As described within the 2023 - 2025 WMP, SDG&E's target for this initiative was to complete QA/QC for 0.5% - 1.5% of Distribution Overhead Detailed Inspections (WMP.478) with an annual target of 160 inspection QA/QCs listed in the QDR. Per SDG&E's 2023 WMP ARC, dated April 1, 2024, SDG&E reported that 150 QA/QC inspections were completed equivalent to 1.3% of the 11,755 Distribution Overhead Detailed Overhead Inspections completed per WMP.478.

SDG&E provided an initial collection of data in confidential Data Request DR002 including GIS files identifying 150 completed QA/QC inspections as reported in the ARC. In response to confidential Data Request DR002B, SDG&E confirmed that the information provided in the GIS files is the record of completion. The IE reviewed the sample of the record data for 20 QA/QC inspections. No issues were identified in the review of the data for the QA/QC inspections.

Although there is a difference of 10 QA/QC inspections between the 2023 Target identified in the QDR and completions reported both in the QDR and the geospatial QDR, the percentage of reported completions (1.3%) falls within the range (0.5% - 1.5%) that was identified for this initiative. The IE confirms that SDG&E met the target for this initiative for 2023.

Table 17: QA/QC Distribution Detailed Summary

Description	2023 Target	2023 WMP ARC Report	DR002 Response	Summary
QA/QC Distribution Detailed Inspections	160 Inspections	150 Inspections	150 Inspections	Target Met

8.1.6.3 - WMP.1192 - QA/QC Distribution Drone

As described within the 2023 - 2025 WMP, SDG&E's target for this initiative was to complete QA/QC of 13,692 drone assessments. Per SDG&E's 2023 WMP Annual Report on Compliance (ARC) dated April 1, 2024, SDG&E reported that 15,311 QA/QC inspections were completed. SDG&E provided an initial collection of data in confidential Data Request DR002 including GIS files identifying 15,314 completed QA/QC inspections. In response to confidential Data Request DR002B, SDG&E confirmed that the information provided in the GIS files is the record of completion. The IE reviewed the sample of the record data for 315 QA/QC inspections. No issues were identified in the review of the data for the QA/QC inspections.

Table 18: QA/QC Distribution Drone Summary

Description	2023 Target	2023 Q4 QDR	DR002 Response	Summary
QA/QC Distribution Drone	13,692 Inspections	15,311 Inspections	15,314 Inspections	Target Met / Exceeded by 1,622 Inspections

8.2.2.1 - WMP.494 - Detailed Inspections

As described within the 2023 - 2025 WMP, SDG&E's target for this initiative was to complete detailed vegetation inspections of 485,400 trees. Per SDG&E's 2023 WMP Annual Report on Compliance (ARC) dated April 1, 2024, SDG&E reported that detailed vegetation inspections were completed of 514,626 trees. SDG&E provided an initial collection of data in confidential Data Request DR002 including GIS files identifying detailed vegetation inspections of 512,186 trees. In response to confidential Data Request DR002B, SDG&E confirmed that the information provided in the GIS files is the record of completion. The IE reviewed the sample of the record data for 500 detailed vegetation inspections. No issues were identified in the review of the data for the detailed vegetation inspections.

Table 19: Detailed Inspections Summary

Description	2023 Target	2023 WMP ARC Report	DR002 Response	Summary
Detailed Inspections	485,400 Inspections	514,626 Inspections	512,186 Inspections	Target Met / Exceeded by 26,786 Inspections

Although there is a difference of 2,440 inspections between the totals for detailed vegetation inspections as reported in the 2023 WMP ARC Report and the Geospatial QDR, the IE confirms that SDG&E met the target for this initiative for 2023.

8.2.2.2 - WMP.508 - VM Off-Cycle Patrol (Strike Potential)

As described within the 2023 - 2025 WMP, SDG&E's target for this initiative was to complete 106 off-cycle patrol inspections for the Vegetation Management Areas (VMAs). Per SDG&E's 2023 WMP Annual Report on Compliance (ARC) dated April 1, 2024, SDG&E reported that off-cycle patrol inspections were completed for 106 VMAs. SDG&E provided an initial collection of data in confidential Data Request DR002 including GIS files identifying inspections of 106 VMAs. In response to confidential Data Request DR002B, SDG&E confirmed that the information provided in the GIS files is the record of completion. The IE reviewed the sample of the record data for 20 off-cycle patrol inspections. No issues were identified in the review of the data for the off-cycle patrol inspections.

Table 20: VM Off-Cycle Patrol (Strike Potential) Summary

Description	2023 Target	2023 Q4 QDR	DR002 Response	Summary
VM Off-Cycle Patrol (Strike Potential)	106 VMAs	106 VMAs	106 VMAs	Target Met

8.2.5 - WMP.505 - QA/QC Vegetation Management

As described within the 2023 - 2025 WMP, SDG&E's target for this initiative was to complete QA/QC of 15% of the total vegetation management inspections and mitigation efforts in 2023. Per SDG&E's 2023 WMP Annual Report on Compliance (ARC) dated April 1, 2024, SDG&E reported that QA/QC inspections were completed for 18% of the total vegetation management inspections and mitigation initiatives. SDG&E provided a collection of the geospatial QDR for 2023 Q3 – Q4 in Confidential Response to Data Request DR002 and

completion data for 2023 Q1 – Q2 in Confidential Response to Data Request DR026 with data identifying completion of 96,530 QA/QC inspections representing 17.1% of vegetation management total activities of 563,303 (WMP.494 for 514,626 inspections, WMP.512 for 35,258 poles brushed, WMP.501 for 13,419 trees trimmed or removed).

In Confidential Response to Data Request DR002B, SDG&E confirmed that the data and records provided in the geospatial QDR are the record of completion for the respective initiatives. The IE reviewed the sample of the record data for 500 QA/QC inspections. No issues were identified in the review of the data for the QA/QC inspections.

Although there is an 0.9% difference between the totals for vegetation management QA/QC inspections as reported in the 2023 WMP ARC Report and the completion data, the IE confirms that SDG&E met the target for this initiative for 2023.

Table 21: QA/QC Vegetation Management Summary

Description	2023 Target	2023 Q4 QDR	DR002, DR026 Response	Summary
QA/QC Vegetation Management	15%	18%	17.1%	Target Met/ Exceeded by 2.1%

8.3.3.1 - WMP.449 - Wireless Fault Indicators

Per the 2023 WMP OEIS Table 8-3: Grid Design, Operations, and Maintenance Targets by year, WMP.449 Wireless Fault Indicators had no proposed targets in 2023.

Table 22: Wireless Fault Indicators Summary

Description	2023 Target	2023 WMP ARC Report	Summary
Wireless Fault Indicators	0 Wireless Fault Indicators	N/A	N/A

Table 23: Large Volume Quantifiable Goal/Target – Not Field Verifiable Summary Table

Initiative Number/ID	Initiative Name	Population Size/Target	Sample Size	#, % Verified	#, % Verification Failed
WMP.468	Fixed Power Backup	300	50	50, 100%	0, 0%
WMP.478	Distribution OH Detailed	11,100	315	315, 100%	0, 0%
WMP.479	Transmission OH Detailed Inspections	2387	125	125, 100%	0, 0%
WMP.481	Distribution Infrared	9,578	315	315, 100%	0, 0%
WMP.482	Transmission Infrared Inspections	6,179	200	200, 100%	0, 0%
WMP.483	Distribution Wood Pole Intrusive	50	8	8, 100%	0, 0%
WMP.552	Distribution Drone Assessments	13,692	315	315, 100%	0, 0%
WMP.488	Distribution OH Patrols	86,880	500	500, 100%	0, 0%
WMP.489	Transmission OH Inspections (visual - helo patrol)	6,337	200	200, 100%	0, 0%
WMP.555	Additional Inspections (69kV TLs in Tier 3)	384	50	50, 100%	0, 0%
WMP.492	Substation Inspections	1,632	125	125, 100%	0, 0%
WMP.1191	Secondary Inspections of Transmission (QA/QC)	100	20	20, 100%	0, 0%
WMP.491	QA/QC Distribution Detailed	160	20	20, 100%	0, 0%
WMP.1192	QA/QC Distribution Drone	13,692	315	315, 100%	0, 0%
WMP.494	Detailed Inspections	485,400	500	500, 100%	0, 0%
WMP.508	VM Off-Cycle Patrol (strike potential)	106	20	20, 100%	0, 0%
WMP.505	QA/QC Vegetation Management	79,442	500	500, 100%	0, 0%
WMP.449	Wireless Fault Indicators	N/A	N/A	N/A	N/A

3.1.2.3 Small (less than 100 times) Volume Quantifiable Goal/Target

Pursuant to the Final IE Scope of Work for the Review of Compliance with 2023 WMP, SDG&E provided a complete list of all 2023 WMP activities classified as Small (Less than 100 units) Volume Quantifiable Goal/Target that were conducted in 2023. These 2023 WMP activities identified within the Small Volume list were assessed in this section and presented below by each initiative.

8.1.2.1 - WMP.455 - DIST OH Hardening - Covered Conductor

Data was gathered to review SDGE - DIST OH Hardening. The purpose is to minimize the risks inherent in a high fire potential timeframe.

SDGE's goals are the development of Grid Design, Operations, & Maintenance and restoration prioritization is influenced by several factors including safety, accessibility, availability of repair parts, and availability of personnel.

Findings:

- SDGE Installed, removed, or repaired over 2,400 units of OH to meet the initiative goal.
- SDGE accomplished this with the utilization of contractors or Utility staff.
- Inspection reports were selected for review based on a modified sample size and detailed reviews were conducted targeting Tier 2 and Tier 3 areas.
- The review covered a detailed examination of the reports, ensuring consistency and accuracy.

Findings demonstrated consistent formatting and verbiage across all documents, ensuring clarity and ease of understanding. The structure ID, report date, and work order numbers matched the list of 2,448 reports in the spreadsheet reviewed.

Table 24: DIST OH Hardening - Covered Conductor Summary

Description	2023 Target	2023 Q4 QDR	DR018 Response	Summary
DIST OH Hardening - Covered Conductor)	60 Inspections	60 Inspections	2,448 Inspections	Target met

8.1.2.2 - WMP.473 - Strategic Undergrounding

As described within the 2023 – 2025 WMP, SDG&E's target for this initiative was to complete 84 miles of conversion of overhead systems to underground. Per SDG&E's Q4 QDR dated February 1, 2024, provided in Confidential Response to Data Request DR002, SDG&E reported completion of 70.3 miles (83.7% of target) of strategic undergrounding. SDG&E provided a collection of the geospatial QDR for 2023 Q1 – Q4 in Confidential Response to Data Request DR002 with data identifying completion of 70.3 miles of conversion of strategic undergrounding as summarized below in Table 25. In Confidential Response to Data Request DR002B, SDG&E confirmed that the data and records provided in the geospatial QDR are the record of completion for the respective initiatives. The IE reviewed a sample of the record data for 20 miles of strategic undergrounding. No issues were identified in the review of the data for strategic undergrounding.

In the ARC for the 2023 WMP dated April 4, 2024, SDG&E reported that this initiative met 86% of the projected target and 86% of the intended risk reduction. SDG&E reported that "Various factors were involved in preventing the program from meeting its full target, including permitting, easements, materials, weather conditions, customer property access, and design changes due to customer requests and field conditions."

Table 25: Strategic Undergrounding Summary

Description	2023 Target	2023 WMP ARC Report	DR002 Response	Summary
Strategic Undergrounding	84.43 Miles	70.26 Miles	70.26 Miles	Target Not Met

8.1.2.5.1 - WMP.475 - DIST OH Hardening - Traditional Hardening

As described within the 2023 – 2025 WMP, SDG&E's target for this initiative was to complete 1.9 miles of traditional hardening for distribution. Per SDG&E's Q4 QDR dated February 1, 2024, provided in Confidential Response to Data Request 002, SDG&E reported completion of 2.33 miles of traditional hardening for distribution. SDG&E provided a collection of the geospatial QDR for 2023 Q1 – Q4 in Confidential Response to Data Request DR002 with data identifying completion of 2.33 miles of traditional hardening for distribution as summarized below in Table 26. In Confidential Response to Data Request DR002B, SDG&E confirmed that the data and records provided in the geospatial QDR are the record of completion for the respective initiatives. The IE reviewed the record data for 2.33 miles of traditional No issues were identified in the review of the data for traditional overhead hardening for distribution.

Table 26: DIST OH Hardening - Traditional Hardening Summary

Description	2023 Target	2023 Q4 QDR	DR002 Response	Summary
OH Hardening – Traditional Hardening	1.90 Miles	2.33 Miles	2.33 Miles	Target Met/Exceeded by 0.43 Miles

8.1.2.5.2 - WMP.543 - Transmission OH Hardening

Data was gathered to review SDGE-Transmission OH Hardening. The purpose is to minimize the risks inherent in a high fire potential timeframe.

SDGE's goals are the development of Grid Design, Operations, & Maintenance and restoration prioritization is influenced by several factors including safety, accessibility, availability of repair parts, and availability of personnel.

Findings:

- SDGE Installed, removed, or repaired Traditional OH miles to meet the initiative goal.
- SDGE accomplished this with the utilization of contractors in Q1, Q3, and Q4.
- Inspection reports were selected for review based on a modified sample size and detailed reviews were conducted in Tier 2 HFTD area.
- The review covered a detailed examination of the reports, ensuring consistency and accuracy.

Findings demonstrated consistent formatting and verbiage across all documents, ensuring clarity and ease of understanding. The structure ID, report date, and work order numbers matched the list of 188 reports in the spreadsheet.

Table 27: Transmission OH Hardening Summary

Description	2023 Target	2023 Q4 QDR	DR021 Response	Summary
Transmission OH Hardening	14 Miles	16 Miles	188 Installations	Target Met

8.1.2.5.2 - WMP.545 - Transmission OH Hardening – DUB

As described within the 2023 – 2025 WMP, SDG&E's target for this initiative was to complete 7.1 miles of transmission overhead hardening for distribution underbuild. Per

SDG&E's Q4 QDR dated February 1, 2024, provided in Confidential Response to Data Request 002, SDG&E reported completion of 17.3 miles of transmission overhead hardening for distribution underbuild. SDG&E provided a collection of the geospatial QDR for 2023 Q1 – Q4 in Confidential Response to Data Request DR002 with data identifying completion of 17.9 miles of overhead hardening for distribution underbuild as summarized below in Table 28. In Confidential Response to Data Request DR002B, SDG&E confirmed that the data and records provided in the geospatial QDR are the record of completion for the respective initiatives. The IE reviewed the record data for a sample of 5 miles of transmission overhead hardening for distribution underbuild. No issues were identified in the review of the data for transmission overhead hardening for distribution underbuild.

Table 28: Transmission OH Hardening – DUB Summary

Description	2023 Target	2023 WMP ARC Report	DR002 Response	Summary
Transmission OH Hardening – Distribution Underbuild	7.10 Miles	17.3 Miles	17.9 Miles	Target Met/Exceeded by 10.8 Miles

8.1.2.8.1 - WMP.463 - Advanced Protection

Initiative .463, as outlined in Section 8.1.2.8.1 of the Wildfire Management Plan (WMP), focuses on implementing advanced protection technologies within substations and distribution circuits to mitigate wildfire risks. This initiative aims to enhance situational awareness, improve fault detection, and expedite fault isolation in High Fire-Threat Districts (HFTD).

The data collected for initiative .463, as provided in DR 24 Response, included a spreadsheet with detailed information on five circuits. The data points covered geographical areas, circuit identification, HFTD tier classification, Falling Conductor Protection (FCP) status, Sensitive Ground Fault (SGF) Protection status, Sensitive Relay Profile (SRP) settings, and AMI downed conductor status. However, the response appeared to lack data on Wire Down Detection (WDD) tracking and risk reduction estimation as referenced in Table 8-6 of the WMP.

The data collected for initiative .463 aligns with the WMP Section 8.1.2.8.1 in several ways. The collected information on advanced protection technologies such as FCP, SGF, and SRP is consistent with the WMP's requirements. The presence of extensive documentation and imagery indicates substantial efforts in implementing and tracking these technologies. Overall, the data shows substantial implementation of advanced protection technologies in HFTD areas. The target is assessed to be "not met" as 4 locations were reported completed

with 5 circuits targeted for 2023 in the WMP. The SDG&E QA QDR indicates a delay on the 5th circuit "due to planned undergrounding of a substantial portion of the circuit."

Table 29: Advanced Protection Summary

Description	2023 Target	2023 Q4 QDR	DR024 Response	Summary
Advanced Protection	5	4	5	Target Not Met

8.1.2.8.2 - WMP.1195 - Early Fault Detection

Data was gathered to review SDGE WMP.1195 - Early Fault Detection. The purpose is to minimize the risks inherent in a high fire potential timeframe.

SDGE's goals are the development of Grid Design, Operations, & Maintenance and restoration prioritization is influenced by several factors including safety, accessibility, availability of repair parts, and availability of personnel.

Findings:

- SDGE Installed 32 System automation units for Early fault detection in 32 areas SDGE target of 60 was not met.
- SDGE Accomplished 32 with the utilization of contractors or Utility staff in Tier 2 Tier 3 and Non-HFTD areas.
- Asset features were both support structures and substations.
- Inspection reports were selected for review based on a modified sample size and detailed reviews were conducted.
- The review covered a detailed examination of the reports, ensuring consistency and accuracy.

Findings demonstrated consistent formatting and verbiage across all documents, ensuring clarity and ease of understanding.

Table 30: Early Fault Detection Summary

Description	2023 Target	2023 Q4 QDR	DR019 Response	Summary
Early Fault Detection	60 Installations	32 Installations	32 Installations	Target not Met

8.1.2.8.3 - WMP.549 - LTE Communication Network (DCRI)

Data was gathered to review SDGE WMP.549 -8.1.2.8.3 - WMP.549 - LTE Communication Network (DCRI). The purpose is to minimize the risks inherent in a high fire potential timeframe. SDGE's goals are the development of Grid Design, Operations, & Maintenance and restoration.

The Distribution Communications Reliability Improvement (DCRI) program enables APP and EFD technologies as a reliable communication network is necessary for initiatives that require continuous communication.

Findings:

- SDGE Installed 11 base station units of the 35 SDGE target.
- SDGE Accomplished 11 base station units with documentation. including closeout reports.
- Asset features were base stations for LTE.
- Inspection reports were selected for review based on a modified sample size and detailed reviews were conducted.
- The review covered a detailed examination of the reports, ensuring consistency and accuracy.

Findings demonstrated consistent formatting and verbiage across all documents, ensuring clarity and ease of understanding.

Table 31: LTE Communication Network (DCRI) Summary

Description	2023 Target	2023 Q4 QDR	DR022 Response	Summary
Detailed ground inspections of LTE communication sites	35 Inspections	11 Inspections	11 Inspections	Target not met

8.1.2.10.2 - WMP.1189 - Strategic Pole Replacement

As described within the 2023 – 2025 WMP, SDG&E's target for this initiative was to complete strategic pole replacement for 60 poles. Per SDG&E's Q4 QDR dated February 1, 2024, provided in Confidential Response to Data Request DR002, SDG&E reported replacement of 1 pole for strategic pole replacement. SDG&E provided a collection of the geospatial QDR for 2023 Q1 – Q4 in Confidential Response to Data Request DR002 with data identifying replacement of 1 pole for strategic pole replacement as summarized below in Table 32. In Confidential Response to Data Request DR002B, SDG&E confirmed that the

data and records provided in the geospatial QDR are the record of completion for the respective initiatives. The IE reviewed the record data for 1 pole replacement for strategic pole replacement. No issues were identified in the review of the data for strategic pole replacement.

In the ARC for the 2023 WMP dated April 4, 2024, SDG&E reported that this initiative met 2% of the projected target for this initiative. SDG&E reported that the initiative "experienced delays with onboarding the engineering and design consultants for the 2023 scope of work.". Additionally, the 2023 ARC reports mitigation measures taken by SDG&E which includes creating an RFP for work under this initiative which was awarded to two (2) engineering and design consultants with experience designing SDG&E's overhead system.

Table 32: Strategic Pole Replacement Summary

Description	2023 Target	2023 Q4 QDR	DR002 Response	Summary
Strategic Pole Replacement	60 Poles	1 Pole	1 Pole	Target Not Met

8.1.2.11.1 - WMP.461 - Sectionalizing Devices

A list of completed PSPS Sectionalizing Switches the purpose of which is to improve the ability to isolate high risk areas for potential de-energization. The target for this initiative was met for 2023.

In response to this data request SDG&E provided the following documents:

- SDG&E Response BV DR023.pdf
- DR023_Response_20240517.xlsx

SDG&E DR023_Response_20240517.xlsx is a list of sectionalizing switches installed. Per this list there were 10 total switches installed which matches the Q4 report. The target/goal identified in 3-year, 10-year and Interim Initiative Measures for 2023 was to install ten switches to be validated by completed work orders, GIS data submissions. This target is considered met for 2023. [Section 8.1.1.2 - OEIS Table 8-3; Section 9.1.4 Targets – OEIS Table 9-5: PSPS Targets]

Table 33: Sectionalizing Devices Summary

Description	2023 Target	2023 Q4 QDR	DR023 Response	Summary
Sectionalizing Devices	10 Switches	10 Switches	10 Installations	Target met

8.1.3.6 - WMP.1190 - Transmission Wood Pole Intrusive Inspections

Initiative .1190 in the Wildfire Management Plan (WMP) is addressed under Section 8.1.3.6, which outlines the requirements for Transmission Wood Pole Intrusive Inspections. This initiative mandates that all wood poles over 15 years old undergo intrusive inspections every 10 years, with SDG&E adopting an 8-year cycle for these inspections to enhance reliability and safety. The process involves excavating around the pole base and evaluating the pole's integrity to determine whether it requires reinforcement or replacement. The goal is to ensure that aging infrastructure does not pose a risk of failure, especially in High Fire-Threat Districts (HFTD).

The data provided in response to DR 17 included a spreadsheet listing 81 Transmission Wood Pole Intrusive Inspections, all located in HFTD 2. The inspections were conducted on the ground, with four performed by contractors and the remainder by utility staff. The second response to the request for 20 specific report locations included both a document with general legal objections and also a 20-page document containing Pole Inspection and Detail Reports. These reports detailed the manufacturer, dimensions, capacity, inspection type ("Partial Excavate - Decay" or "Full Excavate - No Decay"), and the history of treatments. While the locations matched the specific report requests, no photos were provided for further confirmation.

The collected data shows that SDG&E adhered to the requirements outlined in Section 8.1.3.6 of the WMP, conducting intrusive inspections of transmission wood poles in HFTD 2. These inspections involved ground-level evaluations, consistent with the specified methods. The detail in the reports, including excavation type and treatment history, aligns with the WMP's focus on assessing and maintaining pole integrity.

The initiative .1190 data was found to generally align with the goals and requirements of WMP Section 8.1.3.6, as inspections were conducted within the specified HFTD region and documented the prescribed methodologies.

Table 34: Transmission Wood Pole Intrusive Inspections Summary

Description	2023 Target	2023 Q4 QDR	DR017 Response	Summary
Transmission Wood Pole Intrusive Inspections	73 Inspections	90 Inspections	81 Inspections	Target Met

8.1.4.3 - WMP.453 - SCADA Capacitors

As described within the 2023 – 2025 WMP, SDG&E's target for this initiative was to replace 15 non-SCADA capacitors with SCADA capacitors. Per SDG&E's Q4 QDR dated February 1, 2024, provided in Confidential Response to Data Request 002, SDG&E reported replacement of 20 capacitors with SCADA capacitors. SDG&E provided a collection of the geospatial QDR for 2023 Q1 – Q4 in Confidential Response to Data Request DR002 with data identifying completion replacement of 20 capacitors with SCADA capacitors as summarized below in Table 35. In Confidential Response to Data Request DR002B, SDG&E confirmed that the data and records provided in the geospatial QDR are the record of completion for the respective initiatives. The IE reviewed the record data for a sample of 5 SCADA capacitors. No issues were identified in the review of the data for the replacement of capacitors with SCADA capacitors.

Table 35: SCADA Capacitors Summary

Description	2023 Target	2023 Q4 QDR	DR002 Response	Summary
SCADA Capacitors	15 Capacitors	20 Capacitors	20 Capacitors	Target Met/Exceeded by 5 Capacitors

8.1.4.4 - WMP.459 - Expulsion Fuse Replacement

As described within the 2023 – 2025 WMP, SDG&E's target for this initiative was to replace 40 existing expulsion fuses with new, more fire safe expulsion fuses that are approved by CAL FIRE. Per SDG&E's Q4 QDR dated February 1, 2024, provided in Confidential Response to Data Request 002, SDG&E reported replacement of 36 expulsion fuses. SDG&E provided a collection of the geospatial QDR for 2023 Q1 – Q4 in Confidential Response to Data Request DR002 with data identifying replacement of 36 expulsion fuses as summarized below in Table 36. In Confidential Response to Data Request DR002B, SDG&E confirmed that the data and records provided in the geospatial QDR are the record of completion for

the respective initiatives. The IE reviewed the record data for a sample of 7 expulsion fuse replacements. No issues were identified in the review of the data for the replacement of expulsion fuses.

In the ARC for the 2023 WMP dated April 4, 2024, SDG&E reported this initiative met 90% of the projected target. SDG&E reported that "The remaining fuses were not installed due to production delay and shortage of fuse inventory," and the remaining expulsion fuse replacements for this initiative will be completed in 2024.

Table 36: Expulsion Fuse Replacement Summary

Description	2023 Target	2023 Q4 QDR	DR002 Response	Summary
Expulsion Fuse Replacement	40 Fuses	36 Fuses	36 Fuses	Target Not Met

8.1.6.4 - WMP.1193 - QA/QC Wood Pole Intrusive (Dist & Trans)

Data was gathered to assess initiative WMP.1193 to section 8.1.6.4 of SDG&E's WMP, describing the QA/QC process of the distribution and transmission wood pole intrusive inspection program per an Internal wood pole inspection audit procedure. This program randomly targets 10 percent of completed inspections to audit monthly. Trending discrepancies are identified and addressed with root cause and field visits to ensure high levels of inspection practices are maintained, safeguarding system reliability.

Data collected in response to requests regarding the initiative was made to evaluate progress made towards meeting the initiative targets. The data report was provided for review in utility response 20240517. A spreadsheet of 122 QA/QCs of distribution and transmission wood pole intrusive inspections was provided, each inspection individually distinguished by Facility ID. This quantity far exceeds the target of 12 inspections referenced in the WMP. Based on this list, 3 inspections were randomly selected for review using an ANSI Z1.4 sample size of the target, and detailed review of the spreadsheet data was conducted to verify to the extent possible based on the data received, targeting both HFTD Tier 2 and HFTD Tier 3 locations distributed across the geographic areas. This data was received in utility response DR_0015b.

The review covered a comprehensive examination of the report. Each report captured a total of 96 data fields in text-only format; images were not included in these reports. The report documented all information associated with the inspection through the 96 fields, including object ID, manufacturer, material, height, inspection type, decay type, year installed, and audit result.

Findings:

- The sample report spreadsheet contained additional information for the 3 poles reviewed. Data that was contained on both spreadsheets did not seem consistent. Spreadsheet containing all QA/QC poles in response 20240517 showed result for each pole selected for review was “no issues” and the status was “completed”. However, the follow-up data request spreadsheet DR0015b, showed only 2 poles received audits, 1 pole was not able to be accessed for audit.
- One (1) pole received a full excavation, 2 received partial excavation.
- Reports documented issues such as termites, heart rot, and exposed pocket for the three (3) sampled.

The sample size percentage of inspections reviewed and confirmed meets and exceeds the target.

Table 37: QA/QC Wood Pole Intrusive (Dist & Trans) Summary

Description	2023 Target	2023 Q4 QDR	DR015 Response	Summary
QA/QC Wood Pole Intrusive (Distribution & Transmission)	12 Inspections	12 Inspections	122 Inspections	Target Met

8.1.6.5 - WMP.1194 - QA/QC Substations

Initiative .1194 under the Wildfire Management Plan (WMP) pertains to the Quality Assurance and Quality Control (QA/QC) of substation inspections, as detailed in Section 8.1.6.5. This section specifies that substation patrol inspections are periodically reviewed by a Construction Supervisor to ensure compliance with regulatory requirements and internal standards. The process involves reviewing a sample of inspections to identify any deficiencies and provide real-time training for inspectors.

The data provided in response to DR 20 included a spreadsheet listing 23 QA/QC substation inspections, all conducted in High Fire-Threat Districts (HFTD) 2 or 3. Each inspection was recorded as a "Work Order" and marked as "no issues" by utility staff. Upon request for specific location reports, the utility supplied 5 single-page Substation Inspection Quality Reports. These reports included a checklist of 10 items with pass or fail checkboxes, covering aspects such as wire/grounding, vegetation, and oil levels. Each report was dated and included the substation name and route letter designation. All items for the 5 locations were marked as passed, with no additional information or photos provided.

The data collected aligns with the requirements of Section 8.1.6.5 in key areas. The inspections were conducted in the specified HFTD regions, and the completion of these inspections by utility staff aligns with the WMP's protocols. The provided reports followed the structure outlined in the WMP, with checkboxes for various inspection criteria and fields for necessary documentation.

The data collected for initiative .1194 generally meets the goals of WMP Section 8.1.6.5, as the inspections were conducted in the required HFTD areas and followed a structured checklist format.

Table 3: QA/QC Substations Summary

Description	2023 Target	2023 Q4 QDR	DR020 Response	Summary
QA/QC of Substation Inspections	18 Inspections	23 Inspections	23 Inspections	Target Met

8.3.2.1.3 - WMP.970 - Air Quality Index

As described within the 2023 - 2025 WMP, SDG&E's target for this initiative was to complete installation of six (6) sensors to detect particulate matter 2.5 microns or smaller in diameter (PM2.5). Per SDG&E's Q4 QDR dated February 1, 2024, provided in Confidential Response to Data Request DR002, SDG&E reported installation of five (5) PM2.5 sensors. SDG&E provided an initial collection of data in confidential Data Request DR002 including GIS files identifying installation of five (5) PM2.5 sensors. In response to confidential Data Request DR002B, SDG&E confirmed that the information provided in the GIS files is the record of completion. The IE reviewed the sample of the record data for five (5) sensors. No issues were identified in the review of the data for the sensors.

Per SDG&E's 2023 WMP Annual Report on Compliance (ARC) dated April 1, 2024, SDG&E reported that six (6) PM2.5 sensors were installed. No updates to completion data were available to validate the installation of the final sensor.

Table 39: Air Quality Index Summary

Description	2023 Target	2023 Q4 QDR and QNL	2023 WMP ARC Report	DR002 Response	Summary
Air Quality Index	6 Sensors	5 Sensors	6 Sensors	5 Sensors	Target Not Met

8.1.2.7 - WMP.462 – Microgrids

Per the 2023 WMP OEIS Table 8-3: Grid Design, Operations, and Maintenance Targets by year, WMP.462 Microgrids had no proposed targets in 2023.

Table 40: Microgrids Summary

Description	2023 Target	2023 WMP ARC Report	Summary
Microgrids	0 Microgrids	N/A	N/A

Table 41: Small Volume Quantifiable Goal/Target Summary Table

Initiative Number/ID	Initiative Name	Population Size/Target	Sample Size	#, % Verified	#, % Verification Failed
WMP.455	DIST OH Hardening - Covered Conductor	60	20	20,100%	0,0%
WMP.473	Strategic Undergrounding	84.4	20	20, 100%	0, 0%
WMP.475	DIST OH Hardening - Traditional Hardening	1.9	2.3	2.3, 100%	0, 0%
WMP.543	Transmission OH Hardening	14	3	3,100%	0,0%
WMP.545	Transmission OH Hardening – Distribution Underbuild	7.1	5	5, 100%	0, 0%
WMP.463	Advanced Protection	5	2	2,100%	0,0%
WMP.1195	Early Fault Detection	6	20	20,100%	0,0%
WMP.549	LTE Communication Network (DCRI)	35	8	8,100%	0,0%
WMP.1189	Strategic Pole Replacement	60	1	1, 100%	0, 0%
WMP.461	Sectionalizing Devices	10	3	3,100%	0,0%
WMP.1190	Transmission Wood Pole Intrusive Inspections	73	20	20,100%	0,0%
WMP.453	SCADA Capacitors	15	5	5, 100%	0, 0%
WMP.459	Expulsion Fuse Replacement	40	5	5, 100%	0, 0%
WMP.1193	QA/QC Wood Pole Intrusive (Dist & Trans)	12	3	2,67%	1,33%
WMP.1194	QA/QC Substations	18	5	5,100%	0,0%
WMP.970	Air Quality Index	6	5	5, 100%	0, 0%
WMP.462	Microgrids	N/A	N/A	N/A	N/A

3.1.2.4 Qualitative Goal/Target

Pursuant to the Final IE Scope of Work for the Review of Compliance with 2023 WMP, SDG&E provided a complete list of all 2023 WMP activities classified as Qualitative Goal/Target that were conducted in 2023. These 2023 WMP activities identified within the Qualitative list were assessed within this section and are presented below in tables grouped by the associated initiative category. The IE findings are defined as follows:

- Activity Validated – Qualitative work on the initiative began and ended in 2023.
- Activity in Progress – Qualitative work on the initiative began in 2023 and continues into 2024.
- Activity Ongoing – Qualitative work on the initiative is incorporated into operations to be repeated annually.
- Activity Discontinued – Per DR003 Response, qualitative work on the initiative that was identified as "discontinued prior to 2023 but had incurred trailing costs in 2023."

Table 42: Community Values at Risk Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
5.4.5 - WMP.493 - Environmental compliance and permitting	Environmental compliance and permitting	▪ SDG&E's confidential DR060 response with release process narrative in attachment SDG&E Response BV DR060.pdf ▪ Amendment to SDGE Subregional Natural Community Conservation Plan in confidential response DR060 attachment OVERHEAD_StatEx Attachments 1-3 FINAL VERSION_072822.pdf ▪ SDGE Dirt Disturbance Exemptions for Utility Operations Activities in confidential response DR060 attachment Envtl Review EXEMPT List_02052024 ▪ SDG&E Best Management Practices Manual for Water Quality Construction in confidential response DR060	Activity Ongoing

		attachment SDGE SW Construction BMP Manual, 2024.pdf Environment Protection Fact Sheets in confidential response DR060: ▪ Hazardous Materials Business Plan attachment FSDGE-B003.pdf ▪ Spill Prevention Control and Countermeasure Plan (SPCC) FSDGE-S0005.pdf SDG&E's Company Operations Standards for in confidential response DR060: ▪ Water Quality Certifications for Construction Projects attachment G8720.pdf ▪ Section 404 Federal Clean Water Act and Section 10 Rivers/Harbors Act compliance attachment G8721.pdf ▪ Section 1600 of Fish and Game Code Lake or Streambed Alteration Agreements attachment G8722.pdf ▪ Hazardous Materials / Waste Management attachment G8724.pdf ▪ Import Fill Materials for Large Projects (>100 Cubic Yards), Projects within Coast Zone, and Environmental Sensitive Areas attachment G8755.pdf ▪ Excavation Dewatering Management attachment G8763.pdf ▪ Mandatory Environmental Training attachment G8704.pdf ▪ Regulations concerning stationary sources as	

		established by local air pollution control districts in attachment G8707.pdf ▪ Construction projects disturbing one or more acres of soil for NDPES attachment G8714.pdf ▪ Facility Compliance with Municipal Storm Water Requirements attachment G8715.pdf ▪ Industrial Waste Discharges to the Sanitary Sewer attachment G8717.pdf	

Table 43: Grid Design, Operations, & Maintenance Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
8.1.2.11.3 - WMP.466 - Generator Grant Program	Generator Grant Program provides portable battery units with solar charging capacity to customers to keep small devices and appliances charged and powered during PSPS events.	▪ Review of document SDG&E Response BV DR005.pdf ▪ Review of document SDG&E_2023-2025_Wildfire_Mitigation_Plan_20231023.pdf ▪ Generator Grant Program – Final 2023.pdf ▪ SDG&E Quarterly Data Report (QDR) Q4, 2023 provided in SDG&E_2023_Q4_Tables1-15	Activity In Progress
8.1.2.11.4 - WMP.467 - Generator Assistance Program	The Generator Assistance Programs focus on enhancing resiliency for customers who	▪ SDG&E Response BV DR004.pdf ▪ SDG&E_2023-2025_Wildfire_Mitigation_Plan_20231023.pdf 1	Activity In Progress

	reside in the HFTD and may be impacted by PSPS events. The program offers a rebate to customers providing a 70-to-90 percent discount on average portable generator models to mitigate the impacts of PSPS.	▪ Generator Assistance Program – Final 2023.pdf ▪ SDG&E Quarterly Data Report (QDR) Q4, 2023 provided in SDG&E_2023_Q4_Tables1-15	
8.1.3.12.1 - WMP.484 - LiDAR inspections of distribution electric lines and equipment		▪ N/A. Per DR003 Response, Initiative identified as discontinued prior to 2023 but had incurred trailing costs in 2023. ▪ SDG&E 2023 WMP ARC Report Dated April 1,2024.	Activity Discontinued
8.1.3.12.2 - WMP.551 - HFTD Tier 3 Distribution Pole Inspections		▪ N/A. Per DR003 Response, Initiative identified as discontinued prior to 2023 but had incurred trailing costs in 2023.	Activity Discontinued
8.1.5.4.1 - WMP.519 - Centralized repository for data	Centralized repository for data	▪ Per SME Interview in Appendix D Item No. 1. ▪ SDG&E 2023 WMP ARC Report Dated April 1,2024.	Activity Ongoing
WMP.1016 – CNF (Distribution Underground)		▪ N/A. Per DR003 Response, Initiative identified as discontinued prior to 2023 but had incurred trailing costs in 2023.	Activity Discontinued

		▪ SDG&E 2023 WMP ARC Report Dated April 1,2024.	
WMP.1017 – CNF (Distribution Overhead)		▪ N/A. Per DR003 Response, Initiative identified as discontinued prior to 2023 but had incurred trailing costs in 2023. ▪ SDG&E 2023 WMP ARC Report Dated April 1,2024.	Activity Discontinued

Table 44: Situational Awareness & Forecasting Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
6.4.3.1 - WMP.450 - Fire potential index	FPI considers weather and fuel conditions to ascertain whether the environment supports fire growth.	▪ SDG&E Response BV DR059.pdf ▪ SDG&E_2023-2025_Wildfire_Mitigation_Plan_20231023.pdf ▪ OEIS Table 8-21 pages 293-295 ▪ OEIS Table 8-22 pages 295 ▪ Table 8-31 page 320 ▪ OEIS Table 9-3 page 410 ▪ Weather Research and Forecasting Model, 1.5 km resolution ▪ SDG&E Quarterly Data Report (QDR) Q4, 2023 provided in SDG&E_2023_Q4_Tables1-15	Activity in Progress
8.3.2.1.1 - WMP.447 - Environmental monitoring systems (Advanced weather monitoring)	Environmental monitoring systems (Advanced weather monitoring)	▪ Per Review of the SDG&E Weather Awareness System Website that shows updates every 10 minutes for wind speed, wind direction, wind gust, temperature, and humidity. See Appendix B, Item 1.	Activity Ongoing
8.3.5 - WMP.541 - High-	High-performance	▪ Per Review of the SDG&E Daily Weather Station Wind Gust Forecast that provides daily updates of circuit forecast for each circuit-associated	Activity Ongoing

performance computing infrastructure	computing infrastructure	weather station, delineating max gust and time for each day. See Appendix B, Item 3. ▪ Sample output from confidential response DR064 attachment station_level_daily_gusts_2024053100.xslc	

Table 45: Vegetation Management & Inspection Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
8.2.4 - WMP.511 - Vegetation management enterprise system	Vegetation management enterprise system	▪ Per screenshots showing two examples of the Epoch Tree Metrics attribute field in the inventory record of a tree associated with an outage and a tree with memo history in confidential response to DR061 in Attachment Tree_Metrics_attribute_field.pdf ▪ Per screenshot illustrating the design/story documentation for the system enhancement in CityWorks/Epoch to automatically populate the Actual Start Date and Actual Finish Date for dispatch work orders associated with the Vegetation Management activities in confidential response to DR061 in Attachment Design_Criteria.pdf ▪ Per screenshots illustrating the process of migrating the Epoch/Vegetation Management datasets into the AWS data lake in confidential response to DR061 in Attachment Epoch_Migration_AWS.pdf	Activity Ongoing

Table 46: Wildfire Mitigation Strategy Development Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
5.1.2 - WMP.521 - Documentation and disclosure of wildfire-related data and algorithms	Documentation and disclosure of wildfire-related data and algorithms	▪ Per user video providing an overview of WiNGS-Ops visualization platform provided in confidential response DR063 in Attachment WiNGS Ops Overview.mp4 ▪ Per user video providing an overview of WiNGS-Planning visualization platform in confidential response DR063 as Attachment WiNGS Planning Video Overview.mp4 ▪ Per user guide for WiNGS-Ops provided in confidential response to DR063 as Attachment wings-ops-user-guide-v2-valid as of June 2024.pdf	Activity Ongoing
4.4.2 - WMP.442 - A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment	A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment	▪ SDG&E Response BV DR054.pdf ▪ SDG&E_2023-2025_Wildfire_Mitigation_Plan_20231023.pdf ▪ WiNGS-Ops Technical Documentation.pdf ▪ WiNGS-Planning Technical Documentation.pdf ▪ 2025 Wildfire Mitigation Plan Update Guidelines Section 1 Updates to Risk Models 2 ▪ R.20-07-013 proceeding currently in CPUC 2 ▪ SDG&E Quarterly Data Report (QDR) Q4, 2023 provided in SDG&E_2023_Q4_Tables1-15	Activity in Progress
WMP.523 - Allocation methodology development and application	Allocation methodology development and application	▪ 2023-2025 Wildfire Mitigation Plan, Section6, Risk Methodology and Assessment and Section 7, Wildfire Mitigation Strategy Development ▪ SDG&E Quarterly Data Report (QDR) Q4, 2023 provided in SDG&E_2023_Q4_Tables1-15	Activity Validated

Table 47: Community Outreach and Engagement Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
8.5.2.4 - WMP.1337 - Community engagement	Community engagement	▪ Review of data request documents 2023 ARK WFS END OF YEAR RECAP 3-8-24.pdf, 2023 PSPS & PSPS AFN EOC REPORTS – ARK.pdf, WMP DR_048_SDGE Mini-Wildfire Safety Fair 6.24.23 Outreach Event Summary.pdf, WMP DR_048_SDGE Mini-Wildfire Safety Fair 9.18.23 Outreach Event Summary.pdf, WMP DR_048_SDGE Resiliency Audit 2023.pdf, WMP DR_048_SDGE Wildfire Safety Fair (Valley Center) 8.26.23 2023 Outreach Event Summary.pdf, WMP DR_048_SDGE Wildfire Safety Presentation_American Red Cross.pdf, WMP DR_048_SDGE Wildfire Safety Presentation_La Maestra (Spanish).pdf, WMP DR_048_SDGE Wildfire Safety Presentation_La Maestra (Spanish).xlsx, WMP_DR048_Sample Social Posts.pdf, WMP_DR048_WSF Flyer 2023.pdf ▪ SDG&E Quarterly Data Report (QDR) Q4, 2023 provided in SDG&E_2023_Q4_Tables1-15	Activity Validated
8.4.4.1 - WMP.527 - Public outreach and education awareness program	Public outreach and education awareness program	▪ Review of data request documents: 2023 ARK WFS END OF YEAR RECAP 3-8-24.pdf, 2023 PSPS & PSPS AFN EOC REPORTS – ARK.pdf, PSPS Workshop - 22June23.pdf, SDRGPSPSWGQ1_Presentation_Mar222023.pdf, SDRGPSPSWGQ2_Presentation_Jun072023.pdf, SDRGPSPSWGQ3_Presentation_Sep202023.pdf, SDRGPSPSWGQ4_Presentation_Dec062023.pdf, Wildfire Safety & PSPS Preparedness Workshop 6-22-23.pdf, WMP DR053_2023 RPSPSWG Summaries.pdf, WMP_DR053_AB 1650 Submittal_2023 File Year.pdf,	Activity Validated

		WMP_DR053_AFN Campaigns and Support Partners.pdf ▪ SDG&E Quarterly Data Report (QDR) Q4, 2023 provided in SDG&E_2023_Q4_Tables1-15	

Table 48: Emergency Preparedness Summary Table

Initiative Name	Initiative Description	Initiative Validation	Finding
8.4.2.1 - WMP.1008 - Emergency preparedness plan	Emergency preparedness plan	▪ Review SDGE-CPUC Brief – 2023 GO 166 Annual Report.pptx ▪ SDG&E Quarterly Data Report (QDR) Q4, 2023 provided in SDG&E_2023_Q4_Tables1-15	Activity Validated
WMP.514 - Crew-accompanying ignition prevention and suppression resources and services	Section 8.1.8.3.2 Identify work related to contract fire resources (CFR's) used during extreme or RFW (red flag warning) days in areas where at risk work in being performed adjacent to wildland fuels during periods of time that have elevated fire risk.	▪ Review of document SDG&E Response BV DR052.pdf ▪ Review of SDG&E_2023-2025_Wildfire_Mitigation_Plan_20231023.pdf ▪ Review of ESP 113.1 SDG&E Wildland Fire Prevention & Fire Safety Plan ▪ SDG&E Quarterly Data Report (QDR) Q4, 2023 provided in SDG&E_2023_Q4_Tables1-15	Activity in Progress
8.1.8.3.3 - WMP.557 - Aviation Firefighting Program	Section 8.1.8.3.3 Aviation Firefighting Program reduces the consequences of wildfires through immediate availability and	▪ Review of document SDG&E Response BV DR062.pdf ▪ Review of document SDG&E_2023-2025_Wildfire_Mitigation_Plan_20231023.pdf ▪ Review of document Review of document FAA for SDG&E.docx ▪ Review of document SDG&E AOM.pdf	Activity in Progress

	containing fire spread within the service territory.	▪ Review of document SDG&E UAS AOM.pdf ▪ Review of document Flight Operations Staff.docx ▪ Review of document Aerial Firefighting Assets.docx ▪ SDG&E Quarterly Data Report (QDR) Q4, 2023 provided in SDG&E_2023_Q4_Tables1-15	
8.4.4 - WMP.563 - Public emergency communication strategy	Public emergency communication strategy	▪ Review of data request response documents 2023 SDGE Crisis Communications Plan _Public.doc and WMP_DR055_ESP Network ▪ SDG&E Quarterly Data Report (QDR) Q4, 2023 provided in SDG&E_2023_Q4_Tables1-15	Activity Validated

3.1.3 Trends and Themes

The 2023 SDG&E WMP reflects ongoing efforts to mitigate wildfire risks through comprehensive strategies, technological advancements, and stakeholder engagement. Within this section, the IE has included key aspects of SDG&E's 2023 WMP initiatives that stand out as a trend or theme of the WMP, specifically to quantifiable, field-verifiable, and qualitative initiatives presented. SDG&E focused on ensuring compliance through rigorous structure and vegetation inspection and quality assurance processes for large volume field-verifiable initiatives. These initiatives included vegetation management and clearance, installation of avian protection, and other grid hardening activities. A total of six (6) initiatives were reviewed in this category.

SDG&E effectively utilized data-driven approaches for managing and verifying large volume not field verifiable initiatives. A total of eighteen initiatives were reviewed in this category. Detailed records and documentation, such as GIS-based tracking systems and SAP databases, were instrumental in validating the completion of various initiatives. Programs like Fixed Power Backup, which installed 362 generators against a target of 300, showed SDG&E's capability to handle and execute large-scale projects efficiently. Integrating lessons learned from previous years into the 2023 WMP underscores SDG&E's commitment to continuous improvement and adaptive management.

Significant progress was made in the small-volume initiatives for 2023, with 17 initiatives reviewed in this category. Transmission OH Hardening—DUB, Transmission Wood Pole Intrusive Inspections, and Sectionalizing Devices were some key initiatives successfully completed. These smaller-scale projects are crucial in reducing ignition risks and enhancing the overall safety of the electric grid.

The qualitative goals and targets of the 2023 WMP emphasized the importance of stakeholder cooperation, data governance, and emergency planning. A total of 21 initiatives were reviewed in this category. SDG&E maintained strong partnerships with local communities and regulatory bodies, enhancing its ability to respond effectively to wildfire risks. Initiatives such as the centralized data repository, ignition management programs, and public communication strategies played pivotal roles in improving situational awareness and preparedness.

Information reviewed during the initiative evaluation demonstrates the ongoing nature of SDG&E's efforts to improve the initiatives associated with the quantitative and qualitative goals/targets. SDG&E has approached these goals systematically, relying on established processes where appropriate, developing new strategies to fill gaps, monitoring outcomes, and refining the approach to incorporate feedback for future wildfire mitigation efforts. The detailed findings in the 2023 WMP provide valuable insights into the utility's progress and ongoing commitment to wildfire safety.

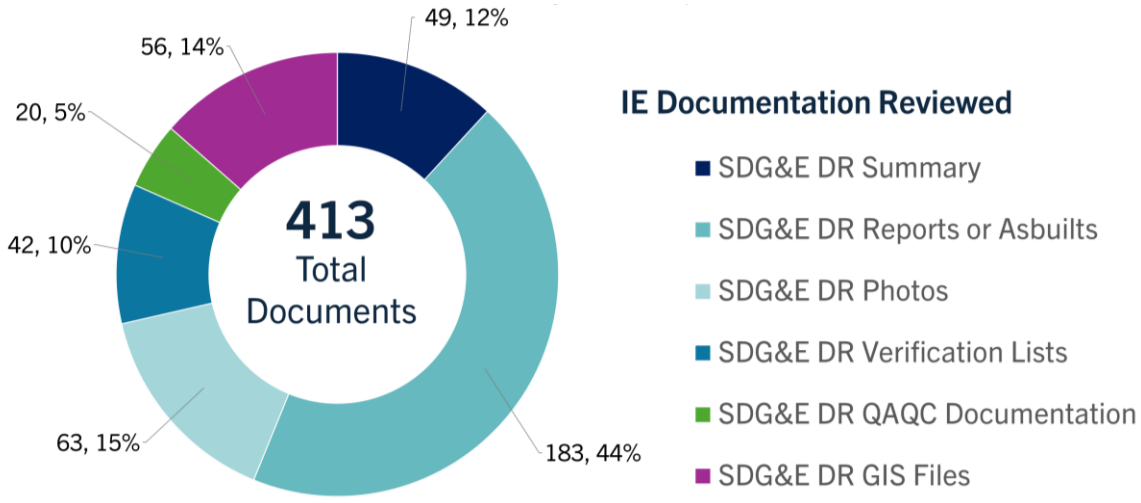


Figure 11: IE Documentation Reviewed for Large Volume Field, Large Volume Not Field, Small Volume, and Qualitative

Note: SDG&E-provided documentation included in the corresponding initiative DRs to IE Data Requests are noted as confidential.

3.2 Verification of Funding

The IE team conducted a comprehensive review of the funding for each initiative of the 2023 WMP to evaluate and verify alignment with planned expenditures. This year, the IE assessed the public data and augmented its assessment with a data request to obtain clarification on some discrepancies found during the review process and get detailed explanations for initiatives with a total spend of less than 100 percent of planned budgets. This enhanced approach facilitated a more precise evaluation of discrepancies between actual and planned financials across the various documents and records reviewed.

The initial assessment involved a comparative analysis of public records issued by SDG&E (from February 2023 to date), which the IE compared to information SDG&E provided in response to the IE's data request for financials. The review included an analysis of actual and planned spend, separated into Expense (OPEX) and Capital (CAPEX) costs, to provide a comprehensive understanding of spending trends. Table 49 - 2023 WMP Funding Verification Summary includes the details of the type of expenditure, whether Capital or Expense, the amount planned, the actual spend amount, and the explanation provided by SDG&E associated with each documented underspend instance.

3.2.1 Summary of Underspend Instances

To evaluate SDG&E's 2023 WMP, dated October 23, 2023, the IE team evaluated financial data for 62 initiatives. The IE reviewed publicly available documents and related attachments listed as Items No. 4 and No. 5 as detailed in Appendix B, List of Supplemental Documents Reviewed. Concurrently, the IE submitted a data request and reviewed the responses SDG&E provided to DR066. Following OEIS's direction, the IE documented all instances, a total of 41, where SDG&E provided less than 100% of the funding for WMP activities and verified SDG&E's explanations for these underspent amounts.

Concurrently, the IE conducted a comparative analysis to identify discrepancies between the different data documents/data sets and identified a few records that needed SDG&E's verification and detailed explanations, which the IE received on June 6, 2024.

Table 49: 2023 WMP Funding Verification Summary
(Thousands of Dollars)

Initiative Category	2023 Initiative Number/ ID	Initiative Name	Expense or Capital	2023 WMP Proposed Spend Amt.	Actual Spend Amt.	Detail on Funding Discrepancy	Satisfied Risk Reduction Goal
Wildfire Mitigation Strategy Development	WMP.442	A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment	Capital	$319	$0	In 2023, capital expenditures were less than planned by 100%. Work related to this initiative has evolved from SDG&E's Circuit Risk Index (CRI) model to the WiNGS cloud-based risk models and WiNGS-Planning and WiNGS-Ops Visualization Platforms, and actual costs are now embedded within Wildfire-Related Data and Algorithms (WMP.521) (see Section 5.1.2). Therefore, there are no associated costs with this initiative.	Yes
Grid Design, Operations, & Maintenance	WMP.449	Wireless Fault Indicators	Capital	$51	$10	There was no target for this program in 2023. Capital expenditures were less than planned by 81% due to no completed work in 2023. All spend was associated with trailing costs from 2022.	No
Grid Design, Operations, & Maintenance	WMP.453	SCADA Capacitors	Capital	$1,885	$1,557	Capital expenditures were less than planned by 17% due to overall reduced unit costs.	Yes
Grid Design, Operations, & Maintenance	WMP.459	Expulsion Fuse Replacement	Capital	$93	$50	Capital expenditures were less than planned by 46% due to two factors. First, costs associated with the remaining 10% of work were not realized. Second, the direct costs for completed work were much less than previous years, which resulted in an imperfect	No

Initiative Category	2023 Initiative Number/ ID	Initiative Name	Expense or Capital	2023 WMP Proposed Spend Amt.	Actual Spend Amt.	Detail on Funding Discrepancy	Satisfied Risk Reduction Goal
						forecast. This is a result of efficiencies realized with high volume jobs being worked at a single structure.	
Grid Design, Operations, & Maintenance	WMP.462	Microgrids	Expense	$1,652	$1,105	O&M was underspent due to a lack of de-energizations in 2023.	No
Grid Design, Operations, & Maintenance	WMP.462	Microgrids	Capital	$16,576	$3,197	Capital spend was decreased due to a change in battery manufacturer, which shifted milestone payments and construction costs to 2024.	No
Grid Design, Operations, & Maintenance	WMP.463	Advanced Protection	Expense	$300	$194	O&M expenditures were less than planned by 35% because O&M forecasting is based on a percentage of capital work and a substantial amount of capital expenditures in 2023 were attributed to engineering, design, and construction activities. O&M expenditures are not typically realized until assets are placed into service and become used and useful. For this reason, O&M expenditures are expected to increase in future years.	No
Grid Design, Operations, & Maintenance	WMP.466	Generator Grant Program	Expense	$7,060	$5,407	In 2023, the GGP shifted from a quantitative to a qualitative target. As this program matures and high risk qualifying customers are mitigated, the remaining pool of eligible customers decreases. Demand is also driven by customer anticipation of PSPS de-energizations, which was not realized in 2023, resulting in	Yes

Initiative Category	2023 Initiative Number/ ID	Initiative Name	Expense or Capital	2023 WMP Proposed Spend Amt.	Actual Spend Amt.	Detail on Funding Discrepancy	Satisfied Risk Reduction Goal
						lower-than-planned customer participation. For this reason, O&M expenditures were less than planned by 23%.	
Grid Design, Operations, & Maintenance	WMP.1195	Early Fault Detection	Expense	$9	$4	O&M expenditures were less than planned by 60% due to the design delay and inability to complete planned work.	No
Grid Design, Operations, & Maintenance	WMP.467	Generator Assistance Program	Expense	$1,000	$547	In 2023, the GAP shifted from a quantitative to a qualitative target. The program is developed based on the expectation that customers will participate in anticipation of PSPS de-energizations. In 2023, customers experienced only one PSPS activation without de-energization, resulting in lower-than planned customer participation. For this reason, O&M expenditures were less than planned by 45%	Yes
Grid Design, Operations, & Maintenance	WMP.473	Strategic Undergrounding	Expense	$436	$429	An explanation of Expense underspend was not provided by the utility.	No
Grid Design, Operations, & Maintenance	WMP.473	Strategic Undergrounding	Capital	$196,200	$174,778	Capital expenditures were less than planned by 11% due to the postponement of construction and energization to 2024 due to the aforementioned challenges. Cost savings were realized through various means including materials, civil construction, and cash discounts for timely invoicing. Savings were partially offset by the increased project support	No

Initiative Category	2023 Initiative Number/ ID	Initiative Name	Expense or Capital	2023 WMP Proposed Spend Amt.	Actual Spend Amt.	Detail on Funding Discrepancy	Satisfied Risk Reduction Goal
						required to establish the SDG&E and AECOM Portfolio Management Office (PMO) support team. AECOM was contracted to provide program execution management and preconstruction support capabilities at the scale necessary to achieve future strategic undergrounding efforts	
Grid Design, Operations, & Maintenance	WMP.475	DIST OH Hardening - Traditional Hardening	Expense	$1,800	$1,168	O&M expenditures were less than planned by 35% due to estimates being derived from past actuals as a percentage of capital expenditures. However, unlike Covered Conductor hardening, higher O&M costs were anticipated because of the type of projects that were planned to be issued to construction. These non-typical projects were expected to have higher O&M costs than typical reconductor projects, but those additional O&M costs were not realized.	Yes
Grid Design, Operations, & Maintenance	WMP.478	Distribution OH Detailed	Expense	$940	$773	O&M expenditures were less than planned by 18% due to more than 1,000 overhead detailed inspections that were satisfied through risk-informed drone inspections and funded through the Drone Assessments program (WMP.552). See Section 5.2.27 for more information on Drone Assessments.	Yes

Initiative Category	2023 Initiative Number/ ID	Initiative Name	Expense or Capital	2023 WMP Proposed Spend Amt.	Actual Spend Amt.	Detail on Funding Discrepancy	Satisfied Risk Reduction Goal
Grid Design, Operations, & Maintenance	WMP.478	Distribution OH Detailed	Capital	$10,408	$8,687	Capital expenditures were less than planned by 17% due to a reduced number of inspection findings that required a capital repair and delays in completing capital work due to material shortages.	Yes
Grid Design, Operations, & Maintenance	WMP.483	Distribution Wood Pole Intrusive	Capital	$1,592	$1,328	Capital expenditures were less than planned by 17% due to lower than anticipated pole replacements needed resulting from a wood pole intrusive inspection.	Yes
Grid Design, Operations, & Maintenance	WMP.484	LiDAR inspections of distribution electric lines and equipment	Expense	$1,388	$873	O&M expenditures were less than planned by 37% due to the reactive nature of these projects. LiDAR inspections of distribution lines and equipment are performed as part of the QA/QC process for completed overhead activities. Forecasting this work can be difficult due to the reactive nature of the project and the many variables including location and terrain for which projects require these inspections each year. Required LiDAR inspections were completed in 2023 with lower-than-expected costs.	Yes
Grid Design, Operations, & Maintenance	WMP.488	Distribution OH Patrols	Capital	$952	$795	Capital expenditures were less than planned by 17% due to lower than anticipated pole replacements needed resulting from patrols.	Yes

Initiative Category	2023 Initiative Number/ ID	Initiative Name	Expense or Capital	2023 WMP Proposed Spend Amt.	Actual Spend Amt.	Detail on Funding Discrepancy	Satisfied Risk Reduction Goal
Grid Design, Operations, & Maintenance	WMP.519	Centralized repository for data	Expense	$1,944	$1,657	Capital and O&M expenditures were less than planned by 15% and 15%, respectively, due to reassignment of project work from external, contractor resources to internal, full-time employees and descoping and deferral of advanced analytics projects to 2024.	Yes
Grid Design, Operations, & Maintenance	WMP.519	Centralized repository for data	Capital	$11,819	$10,047	Capital and O&M expenditures were less than planned by 15% and 15%, respectively, due to reassignment of project work from external, contractor resources to internal, full-time employees and descoping and deferral of advanced analytics projects to 2024.	Yes
Grid Design, Operations, & Maintenance	WMP.549	LTE Communication Network (DCRI)	Expense	$1,122	$910	Capital and O&M expenditures were less than planned by 26% and 19%, respectively, due to less-than planned volume of work completed in 2023	No
Grid Design, Operations, & Maintenance	WMP.549	LTE Communication Network (DCRI)	Capital	$81,274	$75,714	Capital and O&M expenditures were less than planned by 26% and 19%, respectively, due to less-than planned volume of work completed in 2023	No
Grid Design, Operations, & Maintenance	WMP.552	Distribution Drone Assessments	Expense	$53,171	$52,915	An explanation of Expense underspend was not provided to the IE by the utility.	Yes
Grid Design, Operations, & Maintenance	WMP.552	Distribution Drone Assessments	Capital	$80,740	$75,131	Capital spend for WMP.552 Distribution Drone Assessments is allocated for	Yes

Initiative Category	2023 Initiative Number/ ID	Initiative Name	Expense or Capital	2023 WMP Proposed Spend Amt.	Actual Spend Amt.	Detail on Funding Discrepancy	Satisfied Risk Reduction Goal
						corrective, follow up work that results from a drone inspection. In 2023, this program was underspent on capital by 7% due to corrective pole replacement design delays impacting start of construction expected in 2023 but pushed to 2024.	
Grid Design, Operations, & Maintenance	WMP.972	Avian Protection	Expense	$19	$9	Capital and O&M expenditures were less than planned by 43% and 54% respectively due to a decrease in direct costs for all the jobs listed compared to 2022. Efficiencies were also gained due to a high volume of jobs being performed alongside lightning arrestor replacements and hotline clamp removals at a single structure.	Yes
Grid Design, Operations, & Maintenance	WMP.972	Avian Protection	Capital	$2,507	$1,435	Capital and O&M expenditures were less than planned by 43% and 54% respectively due to a decrease in direct costs for all the jobs listed compared to 2022. Efficiencies were also gained due to a high volume of jobs being performed alongside lightning arrestor replacements and hotline clamp removals at a single structure.	Yes
Grid Design, Operations, & Maintenance	WMP.1016	CNF(Distribution Underground)	Expense	$2,070	$672	This is a retired program that had associated costs in 2023. Capital and O&M expenditures were less than	Yes

Initiative Category	2023 Initiative Number/ ID	Initiative Name	Expense or Capital	2023 WMP Proposed Spend Amt.	Actual Spend Amt.	Detail on Funding Discrepancy	Satisfied Risk Reduction Goal
						planned by 48% and 68% respectively. Electric infrastructure hardening work within the Cleveland National Forest (CNF) was completed, however environmental restoration work is ongoing. Restoration activities are dependent on many factors, including weather, which can make forecasting difficult. This program remains compliant with its Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) as required by the project	
Grid Design, Operations, & Maintenance	WMP.1016	CNF(Distribution Underground)	Capital	$1,183	$620	This is a retired program that had associated costs in 2023. Capital and O&M expenditures were less than planned by 48% and 68% respectively. Electric infrastructure hardening work within the Cleveland National Forest (CNF) was completed, however environmental restoration work is ongoing. Restoration activities are dependent on many factors, including weather, which can make forecasting difficult. This program remains compliant with its Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) as required by the project	Yes

Initiative Category	2023 Initiative Number/ ID	Initiative Name	Expense or Capital	2023 WMP Proposed Spend Amt.	Actual Spend Amt.	Detail on Funding Discrepancy	Satisfied Risk Reduction Goal
Grid Design, Operations, & Maintenance	WMP.1017	CNF(Distribution Overhead)	Capital	$1,471	$756	This is a retired program that had associated costs in 2023. Capital expenditures were less than planned by 49%. Electric infrastructure hardening work within the CNF was completed, however environmental restoration work is ongoing. Restoration activities are dependent on many factors, including weather, which can make forecasting difficult. This program remains compliant with its MMCRP as required by the project.	Yes
Grid Design, Operations, & Maintenance	WMP.1189	Strategic Pole Replacement	Expense	$130	$0	Capital and O&M expenditures were less than planned by 96% and 100%, respectively, due to the 98% of remaining work to be completed.	No
Grid Design, Operations, & Maintenance	WMP.1189	Strategic Pole Replacement	Capital	$1,710	$67	Capital and O&M expenditures were less than planned by 96% and 100%, respectively, due to the 98% of remaining work to be completed.	No
Vegetation Management & Inspection	WMP.497	Fuels Management Program	Expense	$7,011	$5,455	O&M actual expenditures for this initiative were less than planned by 22% due to a restructure of the service agreements and changeout of vendors performing the work. In 2023, Vegetation Management completed a sourcing initiative to restructure all its contracted service agreements, including Fuels Management. With the goal	Yes

Initiative Category	2023 Initiative Number/ ID	Initiative Name	Expense or Capital	2023 WMP Proposed Spend Amt.	Actual Spend Amt.	Detail on Funding Discrepancy	Satisfied Risk Reduction Goal
						of aligning existing vendors and creating synergies in contractor insurance, the mechanical thinning activity of the Fuels Management program was awarded to an existing tree trim contractor, reducing the overall cost of performing this activity	
Vegetation Management & Inspection	WMP.501	Clearance (enhanced trim or remove)	Expense	$10,235	$0	O&M expenditures were less than planned by 100% because actual costs for this program are embedded within overall O&M costs for Detailed Inspections (WMP.494), which include the activities of tree trimming, pre-inspection, and auditing. Currently, there is no ability to specifically isolate the costs associated with enhanced tree clearances.	Yes
Vegetation Management & Inspection	WMP.511	Vegetation management enterprise system	Capital	$2,096	$880	An explanation of Capital underspend was not provided to the IE by the utility.	Yes
Situational Awareness & Forecasting	WMP.447	Environmental monitoring systems (Advanced weather monitoring)	Capital	$416	$206	Capital expenditures were less than planned by 50% due to fewer weather network upgrades than initially planned. The service territory is well saturated with weather stations and there is currently no demand for additional stations.	Yes

Initiative Category	2023 Initiative Number/ ID	Initiative Name	Expense or Capital	2023 WMP Proposed Spend Amt.	Actual Spend Amt.	Detail on Funding Discrepancy	Satisfied Risk Reduction Goal
Situational Awareness & Forecasting	WMP.450	Fire potential index	Capital	$2,426	$1,279	Capital expenditures were less than planned by 47% and O&M expenditures exceeded planned by 13%. FPI capital expenditures decreased due to a change in accounting treatment for the software data subscriptions. Fire behavior modeling software can no longer be capitalized as the costs have almost completely transitioned to data subscriptions, which resulted in the additional O&M spend.	Yes
Emergency Preparedness	WMP.557	Aviation Firefighting Program	Expense	$9,326	$8,014	O&M expenditures were less than planned by 14% due to restructuring Blackhawk contracts, lowering monthly costs, and fewer fires than previous years requiring response. O&M expenditures were forecasted based on historical spend and did not account for a decrease in fires flown.	Yes
Emergency Preparedness	WMP.557	Aviation Firefighting Program	Capital	$7,960	$3,553	Capital expenditures were less than planned by 55% due to the delay of some helicopter enhancements, now planned for 2024.	Yes
Emergency Preparedness	WMP.563	Public emergency communication strategy	Expense	$10,168	$10,128	An explanation of Expense underspend was not provided to the IE by the utility.	Yes

Initiative Category	2023 Initiative Number/ ID	Initiative Name	Expense or Capital	2023 WMP Proposed Spend Amt.	Actual Spend Amt.	Detail on Funding Discrepancy	Satisfied Risk Reduction Goal
Emergency Preparedness	WMP.1008	Emergency preparedness plan	Capital	$20,286	$16,243	Capital expenditures were less than planned by 20% due to the discontinuation of Noggin phase 4/5 and the EOC mobile app. Microsoft Teams is being used in the interim while a replacement for the EOC activation functionality, including notifications, communications, and decision-making tools, is being evaluated.	Yes
Community Outreach and Engagement	WMP.1337	Community engagement	Expense	$505	$435	O&M expenditures were less than planned by 14% due to a lack of PSPS de-energizations, resulting in no activations of CRCs.	Yes

Figure 12: Breakdown of Expense for IE Underspend Categories (Thousands of Dollars)

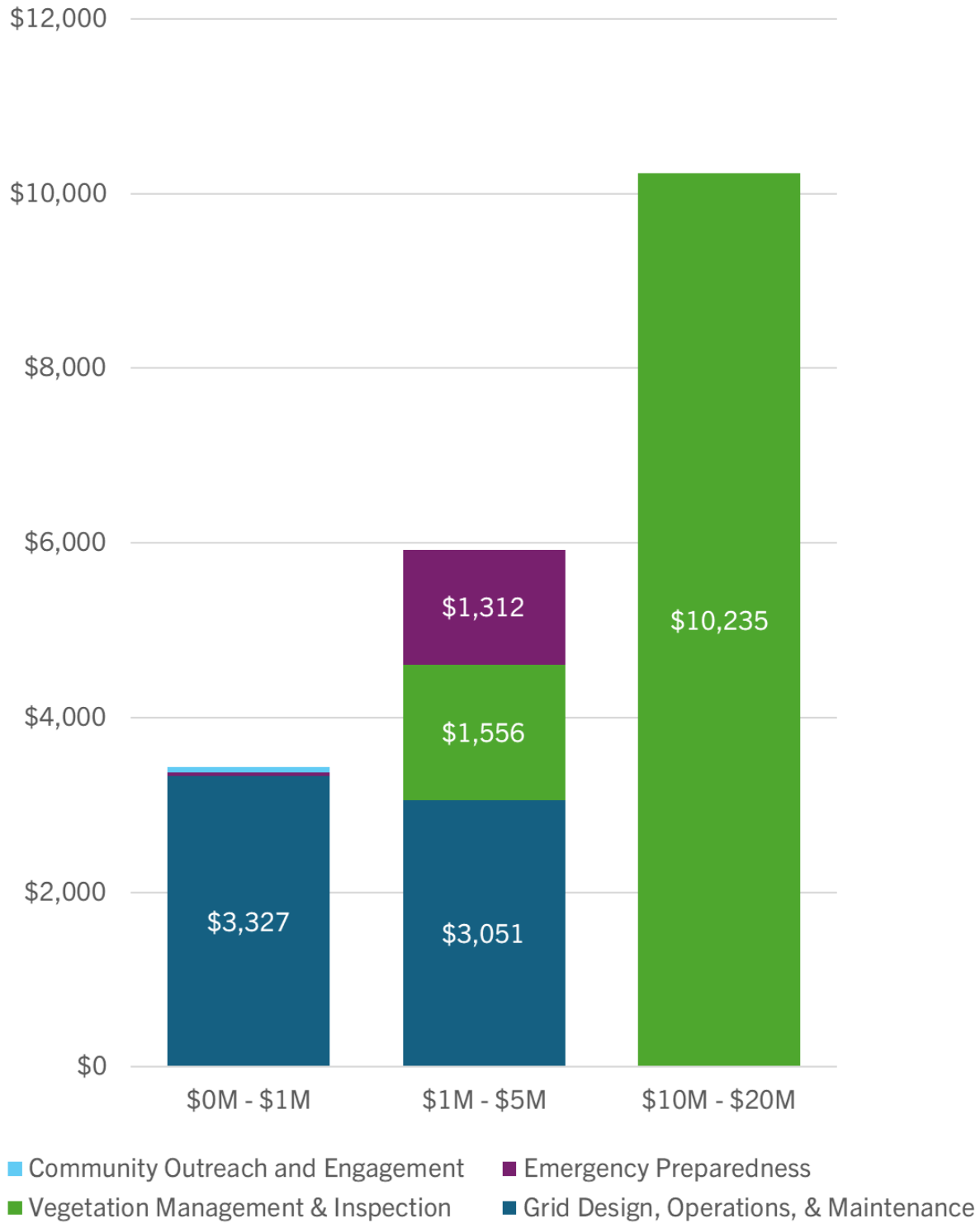
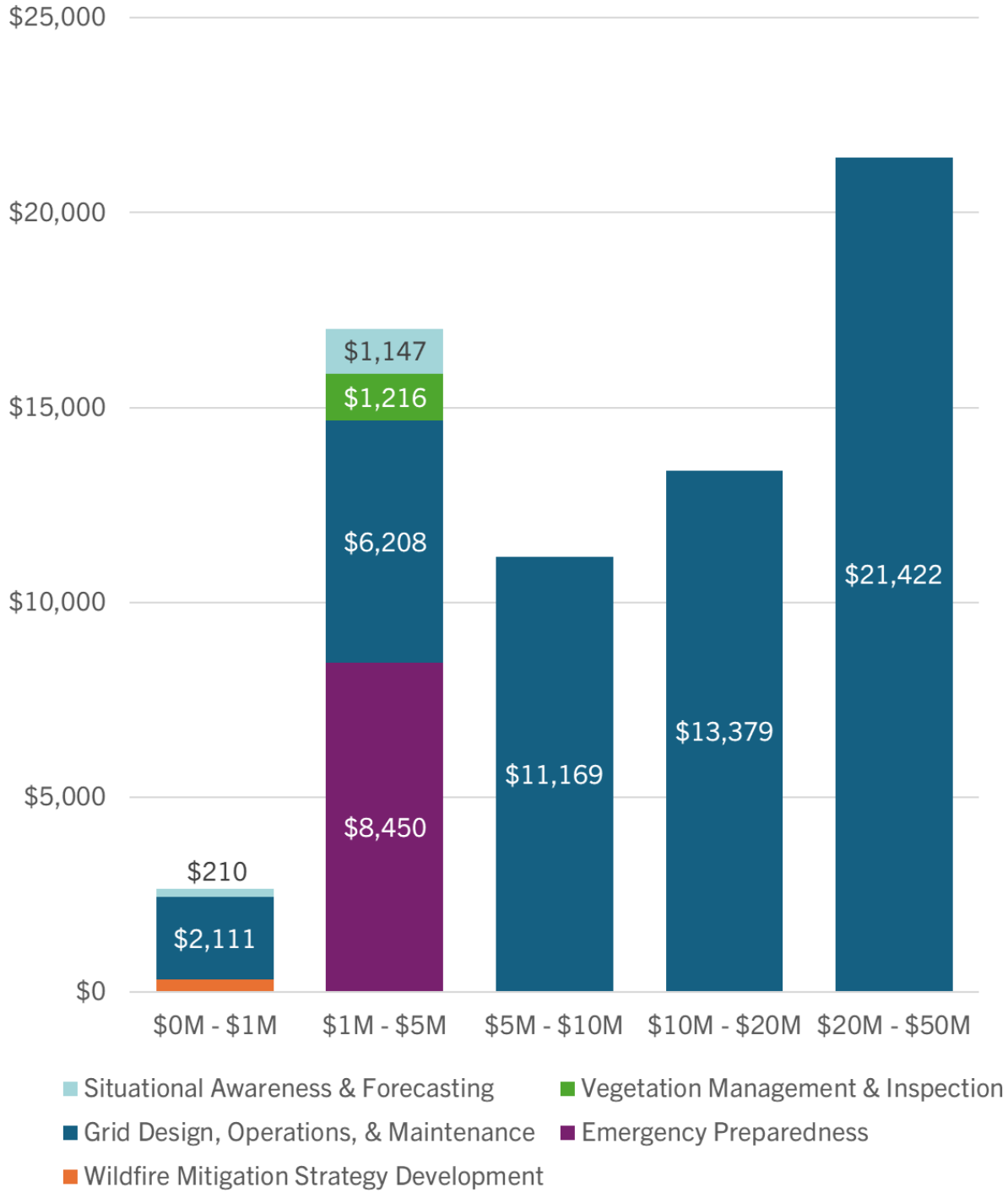


Figure 13: Breakdown of Capital for IE Underspend Categories (Thousands of Dollars)



Upon reviewing the documentation and considering the explanations provided by SDG&E, the IE noted the following findings:

1. SDG&E's Q4 Quarterly Data Report (QDR) on Non-Spatial Data, dated February 1, 2024, Table 11: Mitigation Initiative Financials, available on both SDG&E's website and the OEIS Docket, lacked planned budget information for 2023 financials across all listed initiatives, including OPEX, CAPEX, Territory, and HFTD categories. The IE carefully compared the financial data for various initiatives in the 2023 WMP Annual Report on Compliance (ARC) dated April 1, 2024, utilizing all available information to identify discrepancies, then the IE requested missing information, clarification on discrepancies, and explanations for all underspend instances from SDG&E.

2. Initially, the IE could not determine if certain initiatives were underspent due to the absence of planned budget amounts during the document review. However, after receiving SDG&E's response to the data request and determining that some initiatives were not underspent, the IE included the following information provided by SDG&E as a record of the changes and reallocations made to the planned and actual costs of the inquired initiatives:

    - <u>WMP.511 Vegetation Management enterprise system:</u>
      In response to the IE inquiry for clarification, SDG&E provided the following response: "The original $2.096M capital planned for this initiative was restructured and reduced to $1.8M after SDG&E submitted its initial 2023 WMP Plan, and was shifted to cover two years, 2023 and 2024. The corresponding, reduced budget for 2023 was $1.155M, and the reduced budget for 2024 was $0.645M. The 15% reduction ($2.096 vs. $1.8M) was accomplished in the reduction of scoped activities."

    - <u>WMP.523 Allocation Methodology Development and Application</u>:
      For reference, the 2023 WMP ARC, dated April 1, 2024, shows the following amounts for WMP.523 and WMP.521 Documentation and Disclosure of Wildfire-related Data and Algorithms.

Initiative	Capital Planned	Capital Actual	% Variance
WMP.523	$5.277M	$5.155M	-2%
WMP.521	-	$2.434M	100%

      SDG&E provided a corrected table of costs, shifting planned costs of $1.503M for WiNGS enhancements from WMP.523 to WMP.521. In response to the IE inquiry for clarification, SDG&E provided the following response: "As detailed below, the actual capital spend for this initiative exceeded the planned budget

once planned costs are shifted into the appropriate initiative. Planned costs for WiNGS enhancements and the visualization platform were initially allocated under WMP.523 Allocation Methodology Development and Application, but actual costs were captured under WMP.521 Documentation and Disclosure of Wildfire-related Data and Algorithms. Planned and actual costs for WMP.523 also included Asset 360 enhancements and project work for the Investment Portfolio Optimization (IPO) tool, a tool used to prioritize enterprise capital investments. WMP.523 in the Annual Report on Compliance (ARC) reflects planned costs for WiNGS enhancements, Asset 360, and IPO, but only reflects actuals for Asset 360 and IPO.

A corrected table of costs for WMP.523 and WMP.521 is shown below, shifting planned costs of $1.503M for WiNGS enhancements to WMP.521:

Initiative	Capital Planned	Capital Actual	% Variance
WMP.523	$3.775M	$5.215M	38%
WMP.521	$1.503M	$2.434M	62%

WMP.523 is overspent by 38% due to Asset 360 increasing the scope of work to implement Optical Character Recognition (OCR) technology. This technology enables deeper analysis of data integrity and completeness by comparing existing asset attributes in the system of record with attributes available in text documents such as as-builts.

WMP.521 is overspent by 62% because additional scope was added to the WiNGS visualization platform including disaster recovery, architectural, performance enhancements, and front-end usability features."

- <u>WMP.527 Public outreach and awareness:</u>
  In response to the IE inquiry for clarification, SDG&E provided the following response: "Regarding WMP.527 Public outreach and awareness and WMP.563 Public emergency communication strategy, planned and actual costs for various activities related to PSPS communications and emergency communications were initially captured under WMP.527 and reported as such in Table 11. In developing the ARC, SDG&E identified that these costs are more appropriately reported under WMP.563 because the work is related to public communications. Therefore, SDG&E reallocated the planned and actual capital and O&M spend to WMP.563 for ARC reporting. Thus, the total planned and actual capital and O&M spend for WMP.527 and WMP.563 is reported accurately in the ARC. These changes were made to ensure that

spend under the respective initiatives is accurate and continues through the remainder of the WMP cycle."

- WMP.478 Distribution OH Detailed:
  In response to the IE inquiry for clarification, SDG&E provided the following response: "WMP.478 Distribution OH Detailed inspections costs reported in the ARC include costs that were captured in Table 11 under WMP.551 HFTD Tier 3 Distribution Pole inspections, which was discontinued in 2023 (last effective year was 2022). In developing the ARC, SDG&E identified that WMP.551 costs are more appropriately allocated under WMP.478. Thus, the total planned and actual costs for WMP.478 are reported accurately in the ARC. This change was made to ensure that spend under the respective initiatives is accurate and continues through the remainder of the WMP cycle."

3.3 Verification of QA/QC Programs

Pursuant to the Final IE Scope of Work for the Review of Compliance with 2023 WMP, SDG&E provided a complete list of all 2023 WMP activities with corresponding quality assurance and quality control (QA/QC) programs per Confidential Response to DR003 and assessed herein.

Table 50: 2023 QA/QC Initiative Verification Summary Table

Initiative Name	Initiative Validation	Finding
8.1.2.1 - WMP.455 - DIST OH Hardening - Covered Conductor	▪ Documented in SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs Section G. QA/QC of Overhead Transmission and Distribution WMP Initiatives are performed post-construction inspection (PCI) ▪ SME Interview conducted per Appendix D Item No. 3	Activity Validated
8.1.2.2 - WMP.473 - Strategic Undergrounding	▪ Documented per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf SDG&E performs post-construction inspection diligence	Activity Validated
8.1.2.10.1 - WMP.972 - Avian Protection	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
8.1.2.10.2 - WMP.1189 - Strategic Pole Replacement	▪ Documented per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf SDG&E performs post-construction inspection diligence	Activity Validated
8.1.2.11.1 - WMP.461 - Sectionalizing Devices	▪ Documented in SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC	Activity Validated

	Programs Section G. QA/QC of Overhead Transmission and Distribution WMP Initiatives are performed post-construction inspection (PCI) ▪ SME Interview conducted per Appendix D Item No. 3	
8.1.2.11.2 - WMP.468 - Fixed Power Backup	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed.	NA
8.1.2.11.3 - WMP.466 - Generator Grant Program	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed.	NA
8.1.2.11.4 - WMP.467 - Generator Assistance Program	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed.	NA
8.1.2.5.1 - WMP.475 - DIST OH Hardening - Traditional Hardening	▪ Documented per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf SDG&E performs post-construction inspection diligence	Activity Validated
8.1.2.5.2 - WMP.543 - Transmission OH Hardening	▪ Documented in SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs Section G. QA/QC of Overhead Transmission and Distribution WMP Initiatives are performed post-construction inspection (PCI) ▪ SME Interview conducted per Appendix D Item No. 3	Activity Validated
8.1.2.5.2 - WMP.545 - Transmission OH Hardening - DUB	▪ Documented per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf SDG&E performs	Activity Validated

	post-construction inspection diligence	
8.1.2.8.1 - WMP.463 - Advanced Protection	▪ Documented in SDGE's confidential response DR003 SDGE Response_DR003-BV-QA and QC Programs Section G. QA/QC of Overhead Transmission and Distribution WMP Initiatives are performed post-construction inspection (PCI) ▪ SME Interview conducted per Appendix D Item No. 3	Activity Validated
8.1.2.8.2 - WMP.1195 - Early Fault Detection	▪ Documented in SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs Section B. QA/QC of Distribution Detailed Inspections (WMP.491) as applicable to (WMP.478) as well discussed. ▪ SME Interview conducted per Appendix D Item No. 3	Activity Validated
8.1.2.8.3 - WMP.549 - LTE Communication Network (DCRI)	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed.	NA
8.1.3.1 - WMP.478 - Distribution OH Detailed	▪ Documented in SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs Section B. QA/QC of Distribution Detailed Inspections (WMP.491) as applicable to (WMP.478) as well discussed. ▪ SME Interview conducted per Appendix D Item No. 3	Activity Validated
8.1.3.2 - WMP.479 - Transmission OH Detailed Inspections	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed. ▪ SME Interview conducted per Appendix D Item No. 4	NA

8.1.3.3 - WMP.481 - Distribution Infrared	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
8.1.3.4 - WMP.482 - Transmission Infrared Inspections	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed.	NA
8.1.3.5 - WMP.483 - Distribution Woodpole Intrusive	▪ Documented in SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs Section D. QA/QC of Transmission and Distribution Wood Pole Intrusive Inspections (WMP.1193) as applicable to (WMP.483 and WMP.1190) also. ▪ SME Interview conducted per Appendix D Item No. 3	Activity Validated
8.1.3.6 - WMP.1190 - Transmission Wood Pole Intrusive Inspections	▪ Documented in SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs Section D. QA/QC of Transmission and Distribution Wood Pole Intrusive Inspections (WMP.1193) as applicable to (WMP.483 and WMP.1190) also. ▪ SME Interview conducted per Appendix D Item No. 3	Activity Validated
8.1.3.7 - WMP.552 - Distribution Drone Assessments	▪ Documented per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf QA/QC for this initiative is completed under initiative WMP.1192 ▪ Documented per SDG&E's Confidential Response to DR002 in Q1-Q4 Spatial QDR	Activity Validated
8.1.3.8 - WMP.488 - Distribution OH Patrols	▪ Per SDGE's confidential response in attachment DR003 SDGE	NA

	Response_DR003-BV-QA and QC Programs, this was not listed.	
8.1.3.9 - WMP.489 - Transmission OH Inspections (visual - helo patrol)	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed.	NA
8.1.3.10 - WMP.555 - Additional Inspections (69kV TLs in Tier 3)	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed.	NA
8.1.3.11 - WMP.492 - Substation Inspections	▪ Documented in SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs Section E. QA/QC of Substation Inspections (WMP.1194) as applicable (WMP.492) also. ▪ SME Interview conducted per Appendix D Item No. 3	Activity Validated
8.1.4.3 - WMP.453 - SCADA Capacitors	▪ Documented per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf SDG&E performs post-construction inspection diligence	Activity Validated
8.1.4.4 - WMP.459 - Expulsion Fuse Replacement	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
8.1.4.5 - WMP.464 - Hotline Clamps	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
8.1.4.6 - WMP.550 - Lightning Arrestor Replacement	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A

8.1.6.1 - WMP.1191 - Secondary Inspections of Transmission (QA/QC)	▪ Documented in SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs Section A. QA/QC of Transmission Inspections (WMP.1191) ▪ SME Interview conducted per Appendix D Item No. 3	Activity Validated
8.1.6.2 - WMP.491 - QA/QC Distribution Detailed	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf	Activity Validated
8.1.6.3 - WMP.1192 - QA/QC Distribution Drone	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf	N/A
8.1.6.4 - WMP.1193 - QA/QC Wood Pole Intrusive (Dist & Trans)	▪ Documented in SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs Section D. QA/QC of Transmission and Distribution Wood Pole Intrusive Inspections (WMP.1193) as applicable to (WMP.483 and WMP.1190) also. ▪ SME Interview conducted per Appendix D Item No. 3	Activity Validated
8.1.6.5 - WMP.1194 - QA/QC Substations	▪ Documented in SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs Section E. QA/QC of Substation Inspections (WMP.1194) as applicable to (WMP.492) ▪ SME Interview conducted per Appendix D Item No. 3	Activity Validated
8.2.2.1 - WMP.494 - Detailed Inspections	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A

8.2.2.2 - WMP.508 - VM Off-Cycle Patrol (strike potential)	▪ Documented per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf QA/QC for this initiative is completed under initiative WMP.505 ▪ Documented per SDG&E's Confidential Response to DR002 in Q1-Q4 Spatial QDR	Activity Validated
8.2.3 - WMP.497 - Fuels Management Program	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
8.2.3.1 - WMP.512 - Pole Clearing (brushing)	▪ Documented per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf QA/QC for this initiative is completed under initiative WMP.505 ▪ Documented per SDG&E's Confidential Response to DR002 in Q1-Q4 Spatial QDR	Activity Validated
8.2.3.3 - WMP.501 - Clearance (enhanced trim or remove)	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
8.2.5 - WMP.505 - QA/QC Vegetation Management	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
8.3.2.1.3 - WMP.970 - Air Quality Index	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
8.3.3.1 - WMP.449 - Wireless Fault Indicators	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA	N/A

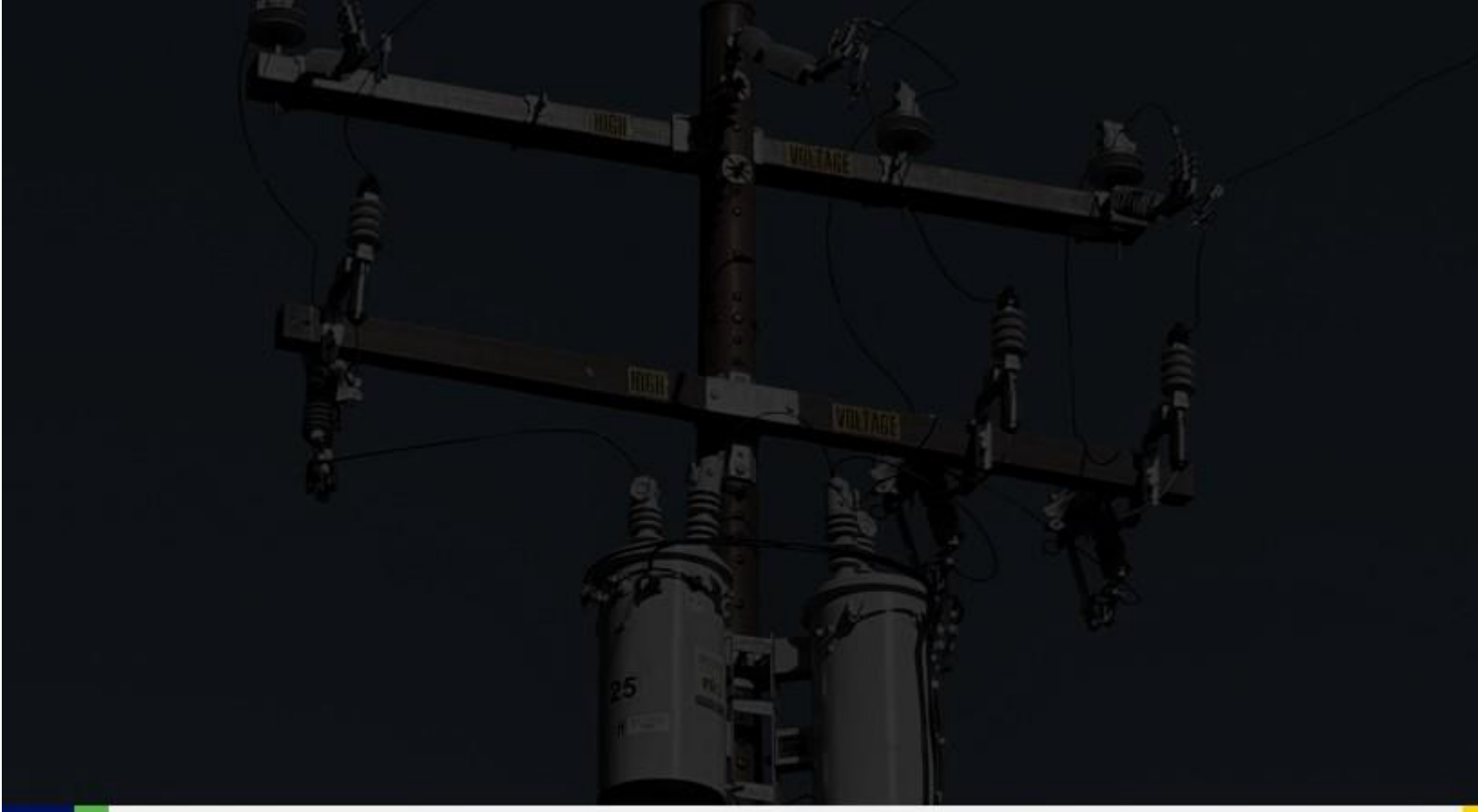
	and QC Programs.pdf, this was not listed.	
8.1.2.7 - WMP.462 - Microgrids	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
8.4.2.1 - WMP.1008 - Emergency preparedness plan	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed.	NA
8.5.2.4 - WMP.1337 - Community engagement	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed.	NA
4.4.2 - WMP.442 - A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed.	NA
6.4.3.1 - WMP.450 - Fire potential index	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed.	NA
WMP.514 - Crew-accompanying ignition prevention and suppression resources and services	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed.	NA
WMP.523 - Allocation methodology development and application	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed.	NA
8.4.4.1 - WMP.527 - Public outreach and education awareness program	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed.	NA
8.1.8.3.3 - WMP.557 - Aviation Firefighting Program	▪ Per SDGE's confidential response in attachment DR003 SDGE	NA

	Response_DR003-BV-QA and QC Programs, this was not listed.	
8.4.4 - WMP.563 - Public emergency communication strategy	▪ Per SDGE's confidential response in attachment DR003 SDGE Response_DR003-BV-QA and QC Programs, this was not listed.	NA
WMP.1016 - CNF(Distribution Underground)	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
WMP.1017 - CNF(Distribution Overhead)	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
8.3.2.1.1 - WMP.447 - Environmental monitoring systems (Advanced weather monitoring)	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
8.1.3.12.1 - WMP.484 - LiDAR inspections of distribution electric lines and equipment	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
5.4.5 - WMP.493 - Environmental compliance and permitting	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
8.2.4 - WMP.511 - Vegetation management enterprise system	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
8.1.5.4.1 - WMP.519 - Centralized repository for data	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
5.1.2 - WMP.521 - Documentation and	▪ Per SDG&E's Confidential Response to DR003 in Attachment	N/A

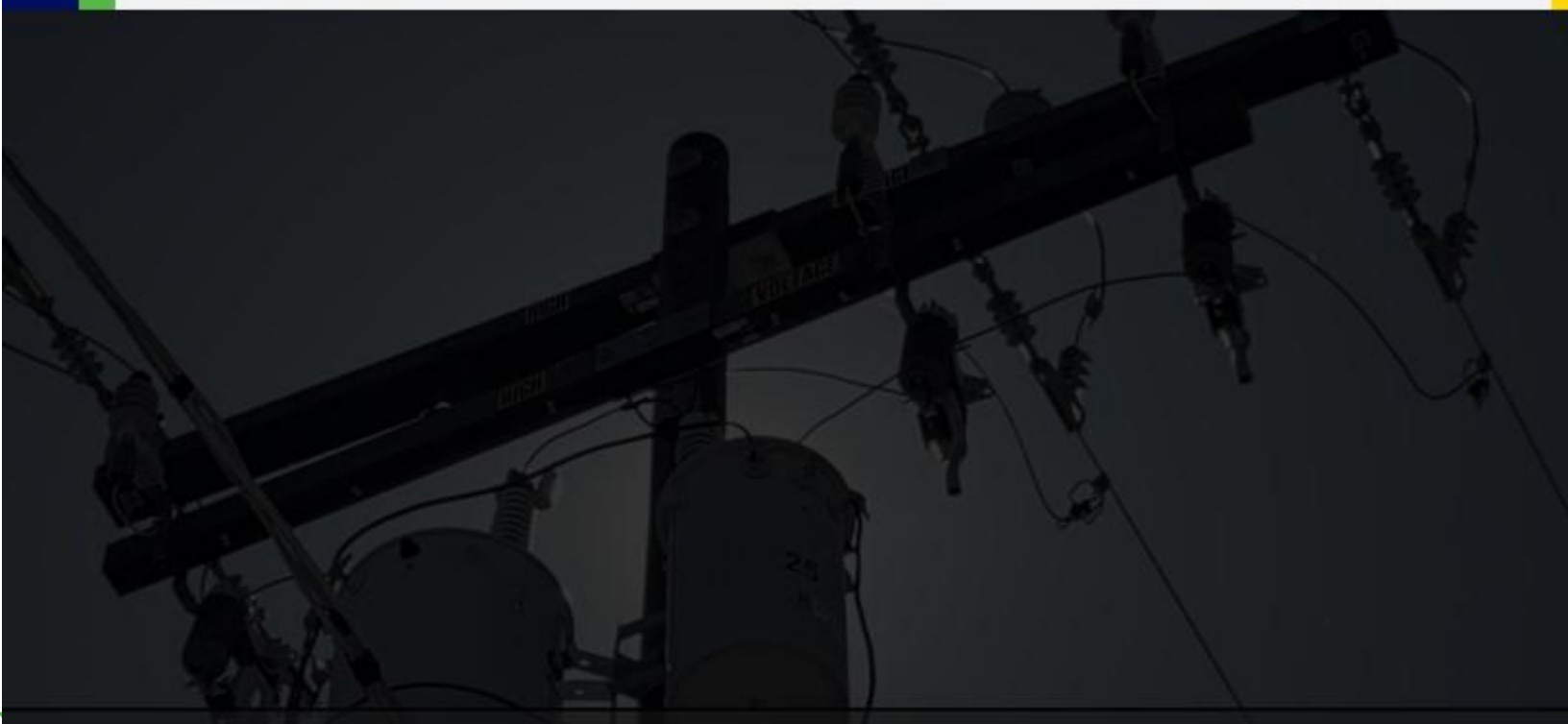
disclosure of wildfire-related data and algorithms	SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	
8.3.5 - WMP.541 - High-performance computing infrastructure	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A
8.1.3.12.2 - WMP.551 - HFTD Tier 3 Distribution Pole Inspections	▪ Per SDG&E's Confidential Response to DR003 in Attachment SDGE Response_DR003-BV-QA and QC Programs.pdf, this was not listed.	N/A

4. CONCLUSION

SDG&E's 2023 to 2025 WMP builds on the previous cycle by focusing efforts to improve risk modeling programs, grid hardening initiatives, and collaboration with the community it serves by promoting outreach and education. Throughout the 2024 Independent Evaluator process, SDG&E participated professionally with punctual and complete responses to IE data requests, SME interviewing processes, and regularly conducted meetings with the IE staff. Based on the evaluation of random samples, SME interviews, and financial review of SDG&E's 2023 WMP list of initiatives, it is the opinion of this IE that SDG&E has significantly met their 2023 WMP goals of reducing the risk of wildfires in the communities it serves.



APPENDICES



BUREAU VERITAS

C2 GROUP

APPENDICES

Appendix A – List of 2023 WMP Activities

SOW Category	2023 WMP Activities	WMP Category	2023 Initiative No.	Initiative Tracking ID	Utility Initiative Name	Initiative Activity
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Grid Design, Operations, & Maintenance	8.1.2.10.1	WMP.972	Avian Protection	Other grid topology improvements to minimize risk of ignitions
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Grid Design, Operations, & Maintenance	8.1.4.5	WMP.464	Hotline Clamps	Other grid topology improvements to minimize risk of ignitions
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Grid Design, Operations, & Maintenance	8.1.4.6	WMP.550	Lightning Arrestor Replacement	Other grid topology improvements to minimize risk of ignitions
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Vegetation Management & Inspection	8.2.3	WMP.497	Fuels Management Program	Fuels management (including slash management)
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Vegetation Management & Inspection	8.2.3.1	WMP.512	Pole Clearing (brushing)	Pole clearing
WMP Activity Completion	a. Large Volume Quantifiable Goal/Target - Field Verifiable	Vegetation Management & Inspection	8.2.3.3	WMP.501	Clearance (enhanced trim or remove)	Clearance
WMP Activity	b. Large Volume Quantifiable	Grid Design, Operations, &	8.1.2.11.2	WMP.468	Fixed Power Backup	Other grid topology improvements to mitigate or

Completion	Goal/Target – Not Field Verifiable	Maintenance				reduce PSPS events
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, & Maintenance	8.1.3.1	WMP.478	Distribution OH Detailed	Asset Inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, & Maintenance	8.1.3.2	WMP.479	Transmission OH Detailed Inspections	Asset Inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, & Maintenance	8.1.3.3	WMP.481	Distribution Infrared	Asset Inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, & Maintenance	8.1.3.4	WMP.482	Transmission Infrared Inspections	Asset Inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, & Maintenance	8.1.3.5	WMP.483	Distribution Woodpole Intrusive	Asset Inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field	Grid Design, Operations, & Maintenance	8.1.3.7	WMP.552	Distribution Drone Assessments	Asset Inspections

	Verifiable					
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, & Maintenance	8.1.3.8	WMP.488	Distribution OH Patrols	Asset Inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, & Maintenance	8.1.3.9	WMP.489	Transmission OH Inspections (visual - helo patrol)	Asset Inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, & Maintenance	8.1.3.10	WMP.555	Additional Inspections (69kV TLs in Tier 3)	Asset Inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, & Maintenance	8.1.3.11	WMP.492	Substation Inspections	Asset Inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, & Maintenance	8.1.6.1	WMP.1191	Secondary Inspections of Transmission (QA/QC)	Secondary Assessment of Transmission Inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, & Maintenance	8.1.6.2	WMP.491	QA/QC Distribution Detailed	Other
WMP	b. Large Volume	Grid Design,	8.1.6.3	WMP.1192	QA/QC Distribution Drone	Other

Activity Completion	Quantifiable Goal/Target – Not Field Verifiable	Operations, & Maintenance				
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Vegetation Management & Inspection	8.2.2.1	WMP.494	Detailed Inspections	Vegetation Inspections
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Vegetation Management & Inspection	8.2.2.2	WMP.508	VM Off-Cycle Patrol (strike potential)	Vegetation Management Inspection Program
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Vegetation Management & Inspection	8.2.5	WMP.505	QA/QC Vegetation Management	Quality assurance / quality control
WMP Activity Completion	b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	Grid Design, Operations, & Maintenance	8.3.3.1	WMP.449	Wireless Fault Indicators	Other grid topology improvements to minimize risk of ignitions
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, & Maintenance	8.1.2.1	WMP.455	DIST OH Hardening - Covered Conductor	Other grid topology improvements to minimize risk of ignitions
WMP Activity Completion	c. Small (less than 100 items) Volume	Grid Design, Operations, & Maintenance	8.1.2.2	WMP.473	Strategic Undergrounding	Undergrounding of electric lines and/or equipment

	Quantifiable Goal/Target					
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, & Maintenance	8.1.2.5.1	WMP.475	DIST OH Hardening - Traditional Hardening	Traditional overhead hardening
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, & Maintenance	8.1.2.5.2	WMP.543	Transmission OH Hardening	Traditional overhead hardening
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, & Maintenance	8.1.2.5.2	WMP.545	Transmission OH Hardening - DUB	Traditional overhead hardening
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, & Maintenance	8.1.2.8.1	WMP.463	Advanced Protection	Installation of system automation equipment
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, & Maintenance	8.1.2.8.2	WMP.1195	Early Fault Detection	Installation of system automation equipment
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, & Maintenance	8.1.2.8.3	WMP.549	LTE Communication Network (DCRI)	Installation of system automation equipment

WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, & Maintenance	8.1.2.10.2	WMP.1189	Strategic Pole Replacement	Other grid topology improvements to minimize risk of ignitions
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, & Maintenance	8.1.2.11.1	WMP.461	Sectionalizing Devices	Other grid topology improvements to mitigate or reduce PSPS events
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, & Maintenance	8.1.3.6	WMP.1190	Transmission Wood Pole Intrusive Inspections	Asset Inspections
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, & Maintenance	8.1.4.3	WMP.453	SCADA Capacitors	Other grid topology improvements to minimize risk of ignitions
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, & Maintenance	8.1.4.4	WMP.459	Expulsion Fuse Replacement	Other grid topology improvements to minimize risk of ignitions
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, & Maintenance	8.1.6.4	WMP.1193	QA/QC Wood Pole Intrusive (Dist & Trans)	Other
WMP Activity	c. Small (less than 100 items)	Grid Design, Operations, &	8.1.6.5	WMP.1194	QA/QC Substations	Other

Completion	Volume Quantifiable Goal/Target	Maintenance				
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Situational Awareness & Forecasting	8.3.2.1.3	WMP.970	Air Quality Index	Air Quality Index
WMP Activity Completion	c. Small (less than 100 items) Volume Quantifiable Goal/Target	Grid Design, Operations, & Maintenance	8.1.2.7	WMP.462	Microgrids	Microgrids
WMP Activity Completion	d. Qualitative	Grid Design, Operations, & Maintenance	8.1.2.11.3	WMP.466	Generator Grant Program	Other grid topology improvements to mitigate or reduce PSPS events
WMP Activity Completion	d. Qualitative	Grid Design, Operations, & Maintenance	8.1.2.11.4	WMP.467	Generator Assistance Program	Other grid topology improvements to mitigate or reduce PSPS events
WMP Activity Completion	d. Qualitative	Community Outreach and Engagement	8.5.2.4	WMP.1337	Community engagement	Other
WMP Activity Completion	d. Qualitative	Community Outreach and Engagement	8.4.4.1	WMP.527	Public outreach and education awareness program	Public outreach and education awareness program
WMP Activity Completion	d. Qualitative	Community Values at Risk	5.4.5	WMP.493	Environmental compliance and permitting	Environmental compliance and permitting
WMP Activity Completion	d. Qualitative	Emergency Preparedness	8.4.2.1	WMP.1008	Emergency preparedness plan	Emergency preparedness plan

WMP Activity Completion	d. Qualitative	Emergency Preparedness		WMP.514	Crew-accompanying ignition prevention and suppression resources and services	Other
WMP Activity Completion	d. Qualitative	Emergency Preparedness	8.1.8.3.3	WMP.557	Aviation Firefighting Program	Other
WMP Activity Completion	d. Qualitative	Emergency Preparedness	8.4.4	WMP.563	Public emergency communication strategy	Public emergency communication strategy
WMP Activity Completion	d. Qualitative	Grid Design, Operations, & Maintenance		WMP.1016	CNF(Distribution Underground)	Other
WMP Activity Completion	d. Qualitative	Grid Design, Operations, & Maintenance		WMP.1017	CNF(Distribution Overhead)	Other
WMP Activity Completion	d. Qualitative	Grid Design, Operations, & Maintenance	8.1.3.12.2	WMP.551	HFTD Tier 3 Distribution Pole Inspections	Asset Inspections
WMP Activity Completion	d. Qualitative	Grid Design, Operations, & Maintenance	8.1.5.4.1	WMP.519	Centralized repository for data	Other
WMP Activity Completion	d. Qualitative	Grid Design, Operations, & Maintenance	8.1.3.12.1	WMP.484	LiDAR inspections of distribution electric lines and equipment	Asset Inspections
WMP Activity Completion	d. Qualitative	Situational Awareness & Forecasting	6.4.3.1	WMP.450	Fire potential index	Fire potential index
WMP Activity Completion	d. Qualitative	Situational Awareness & Forecasting	8.3.2.1.1	WMP.447	Environmental monitoring systems (Advanced weather monitoring)	Environmental monitoring systems (Advanced weather monitoring)
WMP	d. Qualitative	Situational	8.3.5	WMP.541	High-performance computing	High-performance computing

Activity Completion		Awareness & Forecasting			infrastructure	infrastructure
WMP Activity Completion	d. Qualitative	Vegetation Management & Inspection	8.2.4	WMP.511	Vegetation management enterprise system	Vegetation management enterprise system
WMP Activity Completion	d. Qualitative	Wildfire Mitigation Strategy Development	4.4.2	WMP.442	A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment	Other
WMP Activity Completion	d. Qualitative	Wildfire Mitigation Strategy Development		WMP.523	Allocation methodology development and application	Other
WMP Activity Completion	d. Qualitative	Wildfire Mitigation Strategy Development	5.1.2	WMP.521	Documentation and disclosure of wildfire-related data and algorithms	Other

Appendix B – List of Documents Reviewed

Item No.	Documents Reviewed - Public	Document Date
1	SDG&E Weather Awareness System Website, https://weather.sdgeweather.com/ (Accessed May 2024)	25-May-24
2	SDG&E Fire Forecast Data Models Website, https://wifire-data.sdsc.edu/organization/sdge (Accessed May 2024)	25-May-24
3	SDG&E Daily Weather Station Wind Gust Forecast, https://wifire-data.sdsc.edu/dataset/sdge-daily-weather-station-wind-gust-forecast	9-Jun-24
4	SDG&E Quarterly Data Report on Non-Spatial Data 02-01-2024_0	1-Feb-24
5	SDG&E 2023 WMP Annual Report on Compliance	1-Apr-24
6	SDG&E's ESP 113.1 SDG&E Wildland Fire Prevention & Fire Safety Plan	25-Feb-22
7	SDG&E Quarterly Notification Letter (QNL)	01-Feb-24
8	SDG&E Quarterly Data Report on WMP GIS and Tabular Data (QDR) Q4	01-Feb-24

Appendix C – Data Log, Data and Interview Requests

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
DR001	4/26/2024	BV	NA	4/29/2024	NA	DR001	SDGE Response_DR001-BV SDGE_2023-2025 Wildfire Mitigation Plan_20231023
DR002	4/26/2024	BV	NA	4/29/2024	NA	DR002	SDGE Response_DR002-BV SDGE_2023_ARC_20240402 SDGE_2023_Q1NonConfidential.gdb (ZIP File) SDGE_2023_Q2NonConfidential.gdb (ZIP File) SDGE_2023_Q3_NonConfidential.gdb (ZIP File) SDGE_2023_Q4_NonConfidential (ZIP File) SDGE_2023_Q4_Tables1-15_copy WMP Initiatives Categorized
DR002.b	6/13/2024	BV	NA	6/13/2024	NA	DR002.b	SDGE Response_DR002.B-BV
DR003	4/26/2024	BV	NA	4/29/2024	NA	DR003	SDGE Response_DR003-BV-QA and QC Programs
DR004	5/30/2024	BV	8.1.2.11.4 - WMP.467 - Generator Assistance Program	6/3/2024	8.1.2.11.4 - WMP.467	DR 04	Generator Assistance Program-Final_2023 SDG&E Response BV DR004
DR005	5/30/2024	BV	8.1.2.11.3 - WMP.466 - Generator Grant Program	6/3/2024	8.1.2.11.3 - WMP.466	DR 05	Generator Grant Program - Final_2023 SDG&E Response BV DR005
DR006	5/10/2024	BV	8.1.3.8 - WMP.488 -	5/15/2024	8.1.3.8 - WMP.488	DR 06	DR006_Response_20240515 SDG&E Response BV DR006

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
			Distribution OH Patrols				
DR006.b	5/20/2024	BV	8.1.3.8 - WMP.488 - Distribution OH Patrols	5/23/2024	8.1.3.8 - WMP.488	DR 06.b	DRO06b_Response_20240523 SDG&E Response BV DRO06.b
DR007	5/10/2024	BV	8.1.3.1 - WMP.478 - Distribution OH Detailed	5/15/2024	8.1.3.1 - WMP.478	DR 07	DR007_Response_20240515 SDG&E Response BV DR007
DR007.b	5/20/2024	BV	8.1.3.1 - WMP.478 - Distribution OH Detailed	5/23/2024	8.1.3.1 - WMP.478	DR 07.b	DRO07b_Response_20240523 SDG&E Response BV DRO07.b
DR008	5/14/2024	BV	8.1.3.9 - WMP.489 - Transmission OH Inspections (visual - helo patrol)	5/17/2024	8.1.3.9 - WMP.489	DR 08	DR008_Response_20240517 SDG&E Response BV DR008
DR008.b	6/3/2024	BV	8.1.3.9 - WMP.489 - Transmission OH Inspections (visual - helo patrol)	6/4/2024	8.3.1.9 - WMP.489	DR 08.B	SDG&E Response BV DR008b

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
DR009	5/14/2024	BV	8.1.3.4 - WMP.482 - Transmission Infrared Inspections	5/17/2024	8.1.3.4 - WMP.482	DR 09	DR009_Response_20240517 SDG&E Response BV DR009
DR009.b	6/3/2024	BV	8.1.3.4 - WMP.482 - Transmission Infrared Inspections	6/4/2024	8.1.3.4 - WMP.482	DR 09.B	SDG&E Response BV DR009b
DR010	5/14/2024	BV	8.1.3.2 - WMP.479 - Transmisson OH Detailed Inspections	5/17/2024	8.1.3.2 - WMP.479	DR 10	DR010_Response_20240517 SDG&E Response BV DR010
DR010	6/3/2024	BV	8.1.3.2 - WMP.479 - Transmisson OH Detailed Inspections	6/4/2024	8.1.3.2 - WMP.479	DR 10.B	SDG&E Response BV DR010b
DR011	5/10/2024	BV	8.1.3.10 - WMP.555 - Additional Inspections (69kV TLs in Tier 3)	5/15/2024	8.1.3.10 - WMP.555	DR 11	DR011_Response_20240515 SDG&E Response BV DR011

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
DR011.b	5/20/2024	BV	8.1.3.10 - WMP.555 - Additional Inspections (69kV TLs in Tier 3)	5/23/2024	8.1.3.10 - WMP.555	DR 11.b	SDG&E Response BV DR011.b
DR012	5/10/2024	BV	8.1.3.5 - WMP.483 - Distribution Woodpole Intrusive	5/17/2024	8.1.3.5 - WMP.483	DR 12	DR012_Response_20240517 SDG&E Response BV DR012
DR012.b	6/3/2024	BV	8.1.3.5 - WMP.483 - Distribution Woodpole Intrusive	6/6/2024	8.1.3.5 - WMP.483	DR 12.b	SDG&E Response BV DR012b SDG&E Response BV DR012b_8_poles
DR013	5/10/2024	BV	8.1.3.11 - WMP.492 - Substation Inspections	5/15/2024	8.1.3.11 - WMP.492	DR 13	DR013_Response_20240515 DR013_Response_WorkOrders_20240515 SDG&E Response BV DR013
DR013.b	5/20/2024	BV	8.1.3.11 - WMP.492 - Substation Inspections	5/23/2024	8.1.3.11 - WMP.492	DR 13.b	SDG&E Response BV DR013.b Attachments (ZIP File) SDG&E Response BV DR013.b
DR014	5/14/2024	BV	8.1.2.11.2 - WMP.468 -	5/17/2024	8.1.2.11.2 - WMP.468	DR 14	DR014_Response_20240517 SDG&E Response BV DR014

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
			Fixed Power Backup				
DR014.b	6/12/2024	BV	8.1.2.11.2 - WMP.468 - Fixed Power Backup	6/12/2024	8.1.2.11.2 - WMP.468	DR 14b	SDG&E Response BV DR014b
DR015	5/14/2024	BV	8.1.6.4 - WMP.1193 - QA/QC Wood Pole Intrusive (Dist & Trans)	5/17/2024	8.1.6.4 - WMP.1193	DR 15	DR015_Response_20240517 SDG&E Response BV DR015
DR015.b	6/3/2024	BV	8.1.6.4 - WMP.1193 - QA/QC Wood Pole Intrusive (Dist & Trans)	6/6/2024	8.1.6.4 - WMP.1193	DR 15b	Intrusive Audit Results_DR0015b SDG&E Response BV DR015b
DR016	5/10/2024	BV	8.1.6.1 - WMP.1191 - Secondary Inspections of Transmission (QA/QC)	5/15/2024	8.1.6.1 - WMP.1191	DR 16	DR016_Response_20240515 SDG&E Response BV DR016
DR016.b	5/20/2024	BV	8.1.6.1 - WMP.1191 - Secondary Inspections of	5/23/2024	8.1.6.1 - WMP.1191	DR 16.b	SDG&E Response BV DR016.b

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
			Transmission (QA/QC)				
DR017	5/10/2024	BV	8.1.3.6 - WMP.1190 - Transmission Wood Pole Intrusive Inspections	5/15/2024	8.1.3.6 - WMP.1190	DR 17	DR017_Response_20240515 SDG&E Response BV DR017
DR017.b	5/20/2024	BV	8.1.3.6 - WMP.1190 - Transmission Wood Pole Intrusive Inspections	5/23/2024	8.1.3.6 - WMP.1190	DR 17.b	SDG&E Response BV DR017.b SDG&E Response BV DR017.b_Redacted
DR018	5/14/2024	BV	8.1.2.1 - WMP.455 - DIST OH Hardening - Covered Conductor	5/17/2024	8.1.2.1 - WMP.455	DR 18	DR018_Response_20240517 SDG&E Response BV DR018
DR019	5/14/2024	BV	8.1.2.8.2 - WMP.1195 - Early Fault Detection	5/17/2024	8.1.2.8.2 - WMP.1195	DR 19	DR019_Response_20240517 SDG&E Response BV DR019
DR020	5/10/2024	BV	8.1.6.5 - WMP.1194 -	5/15/2024	8.1.6.5 - WMP.1194	DR 20	DR020_Response_20240515 SDG&E Response BV DR020

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
			QA/QC Substations				
DR020.b	5/20/2024	BV	8.1.6.5 - WMP.1194 - QA/QC Substations	5/23/2024	8.1.6.5 - WMP.1194	DR 20.b	SDG&E Response BV DR020.b Attachments (ZIP File) SDG&E Response BV DR020.b
DR021	5/14/2024	BV	8.1.2.5.2 - WMP.543 - Transmission OH Hardening	5/17/2024	8.1.2.5.2 - WMP.543	DR 21	DR021_Response_20240517 SDG&E Response BV DR021
DR022	5/20/2024	BV	8.1.2.8.3 - WMP.549 - LTE Communication Network (DCRI)	5/28/2024	8.1.2.8.3 - WMP.549	DR 22	SDG&E Response BV DR022 Attachments_CONFIDENTIAL (ZIP File) SDG&E Response BV DR022 SDGE Response BV DR022 Confidentiality Declaration Will Speer 5-28-24
DR023	5/14/2024	BV	8.1.2.11.1 - WMP.461 - Sectionalizing Devices	5/17/2024	8.1.2.11.1 - WMP.461	DR 23	DR023_Response_20240517 SDG&E Response BV DR023
DR024	5/10/2024	BV	8.1.2.8.1 - WMP.463 - Advanced Protection	5/15/2024	8.1.2.8.1 - WMP.463	DR 24	SDG&E Response BV DR024 SDG&E Response BV DR024
DR024.b	5/20/2024	BV	8.1.2.8.1 - WMP.463 -	5/31/2024	8.1.2.8.1 - WMP.463	DR 24.b	SDG&E Response BV DR024.b Attachments (ZIP File) SDG&E Response BV DR024.b

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
			Advanced Protection				SDGE Response BV DR024.b Confidentiality Declaration Will Speer
DR025	Not Used	C2	8.2.2.1 - WMP.494 - Detailed Inspections	NA	8.2.2.1 - WMP.494	NA	Per DR002 and DR002.b Responses
DR026	5/31/2024	C2	8.2.5 - WMP.505 - QA/QC Vegetation Management	6/4/2024	8.2.5 - WMP.505	DR 26	SDG&E Response BV DR026 SDGE_DR026_InitiativeAuditPoint_VegQAQC_2023
DR027	Not Used	C2	8.2.3.1 - WMP.512 - Pole Clearing (brushing)	NA	8.2.3.1 - WMP.512	NA	Per DR002 and DR002.b Responses
DR028	Not Used	C2	8.1.3.7 - WMP.552 - Distribution Drone Assessments	NA	8.1.3.7 - WMP.552	NA	Per DR002 and DR002.b Responses
DR029	Not Used	C2	8.1.6.3 - WMP.1192 - QA/QC Distribution Drone	NA	8.1.6.3 - WMP.1192	NA	Per DR002 and DR002.b Responses

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
DR030	Not Used	C2	8.2.3.3 - WMP.501 - Clearance (enhanced trim or remove)	NA	8.2.3.3 - WMP.501	NA	Per DR002 and DR002.b Responses
DR031	Not Used	C2	8.1.3.3 - WMP.481 - Distribution Infrared	NA	8.1.3.3 - WMP.481	NA	Per DR002 and DR002.b Responses
DR032	Not Used	C2	8.1.4.6 - WMP.550 - Lightning Arrestor Replacement	NA	8.1.4.6 - WMP.550	NA	Per DR002 and DR002.b Responses
DR033	Not Used	C2	8.1.4.5 - WMP.464 - Hotline Clamps	NA	8.1.4.5 - WMP.464	NA	Per DR002 and DR002.b Responses
DR034	Not Used	C2	8.1.2.10.1 - WMP.972 - Avian Protection	NA	8.1.2.10.1 - WMP.972	NA	Per DR002 and DR002.b Responses
DR035	Not Used	C2	8.2.3 - WMP.497 - Fuels Management Program	NA	8.2.3 - WMP.497	NA	Per DR002 and DR002.b Responses

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
DR036	Not Used	C2	8.1.6.2 - WMP.491 - QA/QC Distribution Detailed	NA	8.1.6.2 - WMP.491	NA	Per DR002 and DR002.b Responses
DR037	Not Used	C2	8.2.2.2 - WMP.508 - VM Off-Cycle Patrol (strike potential)	NA	8.2.2.2 - WMP.508	NA	Per DR002 and DR002.b Responses
DR038	Not Used	C2	8.1.2.2 - WMP.473 - Strategic Undergrounding	NA	8.1.2.2 - WMP.473	NA	Per DR002 and DR002.b Responses
DR039	Not Used	C2	8.1.4.4 - WMP.459 - Expulsion Fuse Replacement	NA	8.1.4.4 - WMP.459	NA	Per DR002 and DR002.b Responses
DR040	Not Used	C2	8.1.4.3 - WMP.453 - SCADA Capacitors	NA	8.1.4.3 - WMP.453	NA	Per DR002 and DR002.b Responses
DR041	Not Used	C2	8.1.2.5.2 - WMP.545 - Transmission OH Hardening - DUB	NA	8.1.2.5.2 - WMP.545	NA	Per DR002 and DR002.b Responses

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
DR042	Not Used	C2	8.3.2.1.3 - WMP.970 - Air Quality Index	NA	8.3.2.1.3 - WMP.970	NA	Per DR002 and DR002.b Responses
DR043	Not Used	C2	8.1.2.5.1 - WMP.475 - DIST OH Hardening - Traditional Hardening	NA	8.1.2.5.1 - WMP.475	NA	Per DR002 and DR002.b Responses
DR044	Not Used	C2	8.1.2.10.2 - WMP.1189 - Strategic Pole Replacement	NA	8.1.2.10.2 - WMP.1189	NA	Per DR002 and DR002.b Responses
DR045	5/15/2024	C2	8.3.3.1 - WMP.449 - Wireless Fault Indicators	5/17/2024	8.3.3.1 - WMP.449	DR 45	SDG&E Response BV DR045 WMP Initiatives Categorized
DR046	Not Used	C2	8.1.2.7 - WMP.462 - Microgrids	NA	8.1.2.7 - WMP.462	NA	Per DR002 and DR002.b Responses
DR047	5/31/2024	BV	8.4.2.1 - WMP.1008 - Emergency preparedness plan	6/4/2024	8.4.2.1 - WMP.1008	DR 47	SDG&E Response BV DR047 SDGE-CPUC Brief - 2023 GO 166 Annual Report
DR048	5/31/2024	BV	8.5.2.4 - WMP.1337 -	6/5/2024	8.5.2.4 - WMP.1337	DR 48	SDG&E Response BV DR048 Attachments SDG&E Response BV DR048

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
			Community engagement				
DR049	5/30/2024	BV	4.4.2 - WMP.442 - A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment	6/3/2024	4.4.2 - WMP.442	DR 49	SDG&E Response BV DR049 WiNGS-Ops Technical Documentation WiNGS-Planning Technical Documentation
DR050	5/31/2024	BV	6.4.3.1 - WMP.450 - Fire potential index	6/4/2024	6.4.3.1 - WMP.450	DR 50	SDG&E Response BV DR050
DR051	5/31/2024	BV	5.1.4 - WMP.514 - Crew-accompanying ignition prevention and suppression	6/4/2024	WMP.514	DR 51	SDG&E Response BV DR051

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
			resources and services				
DR052	5/31/2024	BV	WMP.523 - Allocation methodology development and application	6/4/2024	WMP.523	DR 52	SDG&E Response BV DR052
DR053	5/31/2024	BV	WMP.527 - Public outreach and education awareness program	6/5/2024	WMP.527	DR 53	SDG&E Response BV DR053 Attachments (ZIP File) SDG&E Response BV DR053
DR054	5/31/2024	BV	WMP.557 - Aviation Firefighting Program	6/5/2024	WMP.557	DR 54	SDG&E Response BV DR054 Attachments (ZIP File) SDG&E Response BV DR054
DR055	5/31/2024	BV	WMP.563 - Public emergency communication strategy	6/5/2024	WMP.563	DR 55	SDG&E Response BV DR055 Attachments (ZIP File) SDG&E Response BV DR055
DR056	NA	C2	WMP.1016 - CNF(Distribution Underground)	NA	WMP.1016	NA	NA

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
DR057	NA	C2	WMP.1017 - CNF(Distribution Overhead)	NA	WMP.1017	NA	NA
DR058	N	C2	8.3.2.1.1 - WMP.447 - Environmental monitoring systems (Advanced weather monitoring)	NA	8.3.2.1.1 - WMP.447	NA	NA
DR059	Not Used	C2	8.3.12.1 - WMP.484 - LiDAR inspections of distribution electric lines and equipment	NA	8.1.3.12.1 - WMP.484	NA	Per DR002 and DR002.b Responses
DR060	5/31/2024	C2	5.4.5 - WMP.493 - Environmental compliance and permitting	6/5/2024	5.4.5 - WMP.493	DR 60	SDG&E Response BV DR060 SDG&E Response BV DR060 Attachments (ZIP File)
DR061	5/31/2024	C2	8.2.4 - WMP.511 - Vegetation	6/4/2024	8.2.4 - WMP.511	DR 61	SDG&E Response BV DR061 SDG&E Response BV DR061 Attachments (ZIP File)

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
			management enterprise system				
DR062	5/31/2024	C2	8.1.5.4.1 - WMP.519 - Centralized repository for data	6/4/2024	8.1.5.4.1 - WMP.519	DR 62	SDG&E Response BV DR062
DR063	5/31/2024	C2	5.1.2 - WMP.521 - Documentation and disclosure of wildfire-related data and algorithms	6/4/2024	5.1.2 - WMP.521	DR 63	SDG&E Response BV DR063 WiNGS Ops Overview WiNGS Planning Video Overview wings-ops-user-guide-v2-valid as of June 2024
DR064	5/31/2024	C2	8.3.5 - WMP.541 - High-performance computing infrastructure	5/31/2024	8.3.5 - WMP.541	DR 64	SDG&E Response BV DR064 station_level_daily_gusts_2024053100
DR065	Not Used	C2	8.1.3.12.2 - WMP.551 - HFTD Tier 3 Distribution Pole Inspections	NA	8.1.3.12.2 - WMP.551	NA	Per DR002 and DR002.b Responses

SDG&E Data Req. # Tracking Number	Date Sent	From	Subject	Date Response Received	Section	SDG&E DR No.	File Name
DR066	6/3/2024	C2	8.1.3.7 - WMP.551 - HFTD Tier 3 Distribution Pole Inspections	6/6/2024	8.1.3.7 - WMP.552	DR 66	SDG&E Response BV DR066 SDG&E Response BV DR066_Revised

DATA REQUEST

Data Request Number: SDGE_DR001

Data Request Date: 04/26/24
Due Date: 05/01/24

Name: Barbara Tomajic
Email: barbara.tomajic@bureauveritas.com
Phone #: (916)514-4511
Company: BVNA

WMP Category: WMP Report

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
NA	NA	2023 Wildfire Mitigation Plan	NA	NA	Document Review	Please provide the official and approved 2023 WMP

DATA REQUEST

Data Request Number: SDGE_DR002

Name: Barbara Tomajic
WMP Category: Initiative List and Goals
Company: BVNA

Data Request Date: 04/12/24
Due Date: 4/17/24

Email: barbara.tomajic@bureauveritas.com
Phone #: (916)514-4511
Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
NA	NA	2023 Wildfire Mitigation Plan	NA	NA	Document Review	Please provide the official and approved 2023 Initiative List in an Excel format including the categorizations.

DATA REQUEST

Data Request Number: SDGE_DR002.b

Name: Barbara Tomajic

WMP Category: Geospatial QDRs

Company: BVNA

Data Request Date: 06/13/24
Due Date: 06/18/24

Email:

Phone #:

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
NA	NA	Geospatial QDRs	NA	NA	Documentation or SME Interview	Please provide confirmation that the data contained in the geospatial QDRs provided in DR002 represents the record of completion for the respective initiatives. **If documentation is not available or easily transmittable, please schedule a SME interview to review and discuss.**

DATA REQUEST

Data Request Number: SDGE_DR003

Name: Barbara Tomajic
WMP Category: QA and QC Programs
Company: BVNA

Data Request Date: 04/26/24
Due Date: 05/01/24

Email: barbara.tomajic@bureauveritas.com
Phone #: (916)514-4511
Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
NA	NA	2023 Wildfire Mitigation Plan	NA	NA	Document Review	Please provide a complete list of existing QA and QC programs with detailed descriptions for each program.

DATA REQUEST

Data Request Number: SDG&E DR004

Data Request Date: 5/30/24
Due Date: 6/4/24

Name: Dave Stoddard
WMP Category: Grid Design, Operations and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	Portable backup power solutions	8.1.2.11.4 - WMP.467 - Generator Assistance Program	Not identified		Document Review	Please provide verification of the program with appropriate documentation that may include but not be limited to project milestones, work orders, quarterly reports, or third-party submissions. Focus on enhancements and activities within the 2023 WMP planning cycle. These should be in PDF, Word, and or Excel format.

DATA REQUEST

Data Request Number: SDG&E DR005

Data Request Date: 5/30/24
Due Date: 6/4/24

Name: Dave Stoddard
WMP Category: Grid Design, Operations and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	Backup power solutions	8.1.2.11.3 - WMP.466 - Generator Grant Program	Not identified		Document Review	Please provide verification of the program with appropriate documentation that may include but not be limited to project milestones, work orders, quarterly reports, or third-party submissions. Focus on enhancements and activities within the 2023 WMP planning cycle. These should be in PDF, Word, and or Excel format.

DATA REQUEST

Data Request Number: SDGE_DR006

Data Request Date: 05/10/2024
Due Date: 05/15/2024

Name: 8.1.3.8 Distribution Overhead Patrol Inspections (WMP.488)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Target - Not Field Verifiable	Inspections	8.1.3.8 Distribution Overhead Patrol Inspections (WMP.488)	86,880	85,857	Document Review	Please provide list of 86,880 Distribution Overhead Patrol Inspections targeted in 2023. To ensure compliance with this target and to verify the effectiveness of the patrol inspections, please include for each inspection listed if completed, area, if any issues were identified during the inspections, and HFTD Tier.

DATA REQUEST

Data Request Number: SDGE_DR006.b

Data Request Date: 05/20/2024
Due Date: 05/23/2024

Name: 8.1.3.8 Distribution Overhead Patrol Inspections (WMP.488)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Target - Not Field Verifiable	Inspections	8.1.3.8 Distribution Overhead Patrol Inspections (WMP.488)	86,880	85,857	Document Review	Please provide the 500 Distribution Overhead Patrol Inspections identified in the attachment spreadsheet file named "SDGE - Data Request_DR006.b - attach - WMP-488" as individual PDF documents for review.

DATA REQUEST

Data Request Number: SDGE_DR007

Data Request Date: 05/10/2024
Due Date: 05/15/2024

Name: 8.1.3.1 Distribution Overhead Detailed Inspections (WMP.478)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Target - Not Field Verifiable	Inspections	8.1.3.1 Distribution Overhead Detailed Inspections (WMP.478)	11,100	11,755	Document Review	Please provide a comprehensive list of the 11,100 (or more) Distribution Overhead Detailed Inspections targeted in 2023. For each inspection listed, indicate whether it was completed, Geographical Area,Identification of Issues, HFTD Tier Classification, and if an open work order was generated.

DATA REQUEST

Data Request Number: SDGE_DR007.b

Data Request Date: 05/20/2024
Due Date: 05/23/2024

Name: 8.1.3.1 Distribution Overhead Detailed Inspections (WMP.478)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Targe - Not Field Verifiable	Inspections	8.1.3.1 Distribution Overhead Detailed Inspections (WMP.478)	11,100	11,755	Document Review	Please provide the 315 Distribution Overhead Detailed Inspections identified in the attachment spreadsheet file named "SDGE - Data Request_DR007.b - attach - WMP-478" as individual PDF documents for review. Please also clarify in a written response why all locations in the data response to DR 07 were located in HFTD 3 with no exceptions.

DATA REQUEST

Data Request Number: SDGE_DR008

Data Request Date: 05/14/24
Due Date: 5/17/24

Name: John Sniegoski
WMP Category: Grid Design, Operations and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Target – Not Field Verifiable	Structures	WMP Section: 8.1.3.9 Initiative: WMP.489	6,337	6,200	Document Review	Please provide list of 6200 aerial patrol inspection reports (as referenced in the SDGE_WMP_OEIS Table 8-6, Section WMP.489 (8.1.3.9) available for review in excel format with threat district, risk area, utility region for each report line.

DATA REQUEST

Data Request Number: SDGE_DR008.b

Data Request Date: 06/03/2024
Due Date: 06/06/2024

Name: Angie Shook
WMP Category: 8.1 Grid Design, Operations, and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of structures	8.1.3.9 - WMP.489 - Transmission OH Inspections (visual - helo patrol)	6,337	6,200	Document review	Please provide 200 Transmission OH Inspection reports for inspections performed in 2023 as specified in attachment SAMPLE REQUEST DR008 Response_20240517

DATA REQUEST

Data Request Number: SDGE_DR009.b

Data Request Date: 06/03/2024
Due Date: 06/06/2024

Name: Angie Shook
WMP Category: 8.1 Grid Design, Operations, and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of structures	8.1.3.4 - WMP.482 - Transmission Infrared Inspections	6,179	6,077	Document review	Please provide 200 Transmission Infrared Inspections reports for inspections performed in 2023 as specified in attachment SAMPLE REQUEST DR009 Response_20240517

DATA REQUEST

Data Request Number: SDGE_DR010

Data Request Date: 05/14/24
Due Date: 5/17/24

Name: John Sniegoski
WMP Category: Grid Design, Operations and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Target – Not Field Verifiable	OH Structures Transmission Detailed Inspections	WMP Section: 8.1.3.2 Initiative: WMP.479	2,387	1,928	Document Review	Please provide list of 1928 detailed inspection reports (as referenced in the SDGE_WMP_OEIS Table 8-6, Section WMP.479 (8.1.3.2) available for review in excel format with threat district, risk area, utility region for each report line.

DATA REQUEST

Data Request Number: SDGE_DR010.b

Data Request Date: 06/03/2024
Due Date: 06/06/2024

Name: Angie Shook
WMP Category: 8.1 Grid Design, Operations, and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of structures	8.1.3.2 - WMP.479 - Transmission OH Detailed Inspections	2,387	1,928	Document review	Please provide 125 Transmission OH Detailed Inspections reports for inspections performed in 2023 as specified in attachment SAMPLE REQUEST DR010 Response_20240517

DATA REQUEST

Data Request Number: SDGE_DR011

Data Request Date: 05/10/2024
Due Date: 05/15/2024

Name: 8.1.3.10 Transmission 69 kV Tier 3 Visual Inspections (WMP.555)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Target - Not Field Verifiable	Structures	8.1.3.10 Transmission 69 kV Tier 3 Visual Inspections (WMP.555)	1,632	1,602	Document Review	Please provide a comprehensive list of the 1632 Transmission 69 kV Tier 3 Visual Inspections targeted in 2023. For each inspection listed, indicate whether it was completed, Geographical Area, Identification of Issues, HFTD Tier (3) Classification, and if an open work order was generated.

DATA REQUEST

Data Request Number: SDGE_DR011.b

Data Request Date: 05/20/2024
Due Date: 05/23/2024

Name: 8.1.3.10 Transmission 69 kV Tier 3 Visual Inspections (WMP.555)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Targe - Not Field Verifiable	Structures	8.1.3.10 Transmission 69 kV Tier 3 Visual Inspections (WMP.555)	1,632	1,602	Document Review	Please provide the 125 Transmission 69 kV Tier 3 Visual Inspections identified in the attachment spreadsheet file named "SDGE - Data Request_DR011.b - attach - WMP-555" as individual PDF documents for review.

DATA REQUEST

Data Request Number: SDGE_DR012

Data Request Date: 05/10/24
Due Date: 5/17/24

Name: John Sniegoski
WMP Category: Grid Design, Operations and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Target – Not Field Verifiable	Distribution Woodpole Intrusive Inspections	WMP Section: 8.1.3.5 Initiative: WMP.483	50	1,038	Document Review	Please provide list of the 1038 matrixed inspections done (as referenced in the SDGE_WMP_OEIS Table 8-6, Section WMP.483 (8.1.3.5) available for review in excel format with threat district, risk area, utility region for each report line.

DATA REQUEST

Data Request Number: SDGE_DR012.b

Data Request Date: 06/03/2024
Due Date: 06/06/2024

Name: Angie Shook
WMP Category: 8.1 Grid Design, Operations, and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of inspections	8.1.3.5 - WMP.483 - Distribution Woodpole Intrusive	50	1,038	Document review	Please provide 8 Distribution Woodpole Intrusive Inspection reports for inspections performed in 2023 as specified in attachment SAMPLE REQUEST DR012 Response_20240517

DATA REQUEST

Data Request Number: SDGE_DR013

Data Request Date: 05/10/2024
Due Date: 05/15/2024

8.1.3.11 Substation Patrol Inspections (WMP.492)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Target - Not Field Verifiable	Inspections	8.1.3.11 Substation Patrol Inspections (WMP.492)	384	396	Document Review	Please provide a comprehensive list of the 384 or more Substation Patrol Inspections targeted in 2023. For each inspection listed, indicate whether it was completed, Geographical Area, Identification of Issues, HFTD Tier Classification, field repair and/or severity level, autogenerated corrective maintenance orders, and if an open work order was generated.

DATA REQUEST

Data Request Number: SDGE_DR013.b

Data Request Date: 05/20/2024
Due Date: 05/23/2024

8.1.3.11 Substation Patrol Inspections (WMP.492)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Target - Not Field Verifiable	Inspections	8.1.3.11 Substation Patrol Inspections (WMP.492)	384	396	Document Review	Please provide the 50 Substation Patrol Inspections identified in the attachment spreadsheet file named "SDGE - Data Request_DR013.b - attach - WMP-492" as individual PDF documents for review. Please also clarify in a written response how all of the 76 work order locations in the data response to DR 13 are referenced to a substation patrol inspection.

DATA REQUEST

Data Request Number: SDGE_DR014

Data Request Date: 05/14/24
Due Date: 5/17/24

Name: John Sniegoski
WMP Category: Grid Design, Operations and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Target – Not Field Verifiable	Generators	WMP Section: 8.1.2.11.2 Initiative: WMP.468	300	362	Document Review	Please provide list of the 362 Generator inspections done as referenced in the SDGE_WMP_OEIS Table 9-5, PSPS Targets - Section WMP.468 (8.1.2.11.2) available for review in excel format with threat district, risk area, utility region for each report line for audit review.

DATA REQUEST

Data Request Number: SDGE_DR014.b

Data Request Date: 06/12/24
Due Date: 6/17/24

Name: Dave Stoddard
WMP Category: Grid Design, Operations and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Target – Not Field Verifiable	Generators	WMP Section: 8.1.2.11.2 Initiative: WMP.468	300	362	Document Review	In regards to the response for DR014 for the 362 Generator inspections done as referenced in the SDGE_WMP_OEIS Table 9-5, PSPS Targets - Section WMP.468 (8.1.2.11.2) available for review in excel format with threat district, risk area, utility region for each report line for audit review, we would like a SME interview ASAP please.

DATA REQUEST

Data Request Number: SDGE_DR015

Data Request Date: 05/14/24
Due Date: 5/17/24

Name: John Sniegoski
WMP Category: Grid Design, Operations and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small (less than 100 items) Volume Quantifiable Goal/Target	Inspections QA/QC Wood Pole Intrusive (Dist & Trans)	WMP Section: 8.1.6.4 Initiative: WMP.1193	12	111	Document Review	Please provide list of the (111) QA/QC inspections done as referenced in the SDGE_WMP_OEIS Table 8-1, Section (8.1.6) and Table 8-7 (WMP.1193) available for review in excel format with threat district, risk area, utility region for each report line for audit review.

DATA REQUEST

Data Request Number: SDGE_DR015.b

Data Request Date: 06/03/2024
Due Date: 06/06/2024

Name: Angie Shook
WMP Category: 8.1 Grid Design, Operations, and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
b. Large Volume Quantifiable Goal/Target – Not Field Verifiable	# of inspections	8.1.6.4 - WMP.1193 - QA/QC Wood Pole Intrusive (Dist & Trans)	12	111	Document review	Please provide 3 QA/QC Wood Pole Intrusive reports for inspections performed in 2023 as specified in attachment SAMPLE REQUEST DR015 Response_20240517

DATA REQUEST

Data Request Number: SDGE_DR016

Data Request Date: 05/10/2024
Due Date: 05/15/2024

8.1.6.1 QA/QC of Transmission Inspections (WMP.1191)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Targe - Not Field Verifiable	Structures	8.1.6.1 QA/QC of Transmission Inspections (WMP.1191)	100	97	Document Review	Please provide a comprehensive list of the 100% Transmission Inspections targeted for QA/QC in 2023. For each, indicate method of field verification, and method of desktop verification. Also, indicate the severity level of condition identified

DATA REQUEST

Data Request Number: SDGE_DR016.b

Data Request Date: 05/20/2024
Due Date: 05/23/2024

8.1.6.1 QA/QC of Transmission Inspections (WMP.1191)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Large Volume Quantifiable Goal/Targe - Not Field Verifiable	Structures	8.1.6.1 QA/QC of Transmission Inspections (WMP.1191)	100	97	Document Review	Please provide the 20 QA/QC Transmission Inspections identified in the attachment spreadsheet file named "SDGE - Data Request_DR016.b - attach - WMP-1191" as individual PDF documents for review. Please also clarify in a written response how all of the locations in the data response to DR 16 use work orders as a method of verification per Column H of the spreadsheet.

DATA REQUEST

Data Request Number: SDGE_DR017

Data Request Date: 05/10/2024
Due Date: 05/15/2024

8.1.3.6 Transmission Wood Pole Intrusive Inspections (WMP.1190)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small Volume Quantifiable Goal/Target	Structures	8.1.3.6 Transmission Wood Pole Intrusive Inspections (WMP.1190)	73	90	Document Review	Please provide a comprehensive list of the 73 or more Transmission Wood Pole Intrusive Inspections targeted in 2023. For each inspection listed, indicate whether it was completed, Geographical Area, Identification of Issues, and HFTD Tier Classification.

DATA REQUEST

Data Request Number: SDGE_DR017.b

Data Request Date: 05/20/2024
Due Date: 05/23/2024

8.1.3.6 Transmission Wood Pole Intrusive Inspections (WMP.1190)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small Volume Quantifiable Goal/Target	Structures	8.1.3.6 Transmission Wood Pole Intrusive Inspections (WMP.1190)	73	90	Document Review	Please provide the 20 Transmission Wood Pole Intrusive Inspections identified in the attachment spreadsheet file named "SDGE - Data Request_DR017.b - attach - WMP-1190" as individual PDF documents for review. Please also clarify in a written response why all locations in the data response to DR 17 were located in HFTD 2 with no exceptions.

DATA REQUEST

Data Request Number: SDGE_DR018

Data Request Date: 05/14/24
Due Date: 5/17/24

Name: John Sniegoski
WMP Category: Grid Design, Operations and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small (less than 100 items) Volume Quantifiable Goal/Target	DIST OH Hardening - Covered Conductor (Miles)	WMP Section: 8.1.2.1 Initiative: WMP.455	60	60	Document Review	Please provide list of the completed area inspections done as referenced in the SDGE_WMP_Section (8.1.2.1) as per Initiative (WMP.455) available for review in excel format with threat district, risk area, utility region for each report line for audit review.

DATA REQUEST

Data Request Number: SDGE_DR019

Data Request Date: 5/14/2024
Due Date: 5/17/24

Name: John Sniegoski
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small (less than 100 items) Volume Quantifiable Goal/Target	Nodes	8.1.2.8.2 WMP.1195	60	32	Document Review	Please provide list of the 32 Early Fault Detection sensor unit inspection reports (as referenced in the SDGE_Table 7-2) available for review in excel format with threat district, risk area, utility region for each report line.

DATA REQUEST

Data Request Number: SDGE_DR020

Data Request Date: 05/10/2024
Due Date: 05/15/2024

Name: 8.1.6.5 QA/QC of Substation Inspections (WMP.1194)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small Volume Quantifiable Goal/Target	Inspections	8.1.6.5 QA/QC of Substation Inspections (WMP.1194)	18	23	Document Review	Please provide a comprehensive list of the 18 or more Transmission Wood Pole Intrusive Inspections targeted in 2023. For each inspection listed, indicate Geographical Area, Identification of Issues, and HFTD Tier Classification.

DATA REQUEST

Data Request Number: SDGE_DR020.b

Data Request Date: 05/20/2024
Due Date: 05/23/2024

Name: 8.1.6.5 QA/QC of Substation Inspections (WMP.1194)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small Volume Quantifiable Goal/Target	Inspections	8.1.6.5 QA/QC of Substation Inspections (WMP.1194)	18	23	Document Review	Please provide the 5 QA/QC of Substation Inspections identified in the attachment spreadsheet file named "SDGE - Data Request_DR020.b - attach - WMP-1194" as individual PDF documents for review.

DATA REQUEST

Data Request Number: SDGE_DR021

Data Request Date: 05/14/24
Due Date: 5/17/24

Name: John Sniegoski
WMP Category: Grid Design, Operations and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small (less than 100 items) Volume Quantifiable Goal/Target	Trans OH Hardening - Covered Conductor (Miles)	WMP Section: 8.1.2.5.2 Initiative: WMP.543	14	16	Document Review	Please provide list of the completed area inspections done as referenced in the SDGE_Table 7.2 / WMP_Section (8.1.2.5.2) as per Initiative (WMP.543) available for review in excel format with threat district, risk area, utility region for each report line for audit review.

DATA REQUEST

Data Request Number: SDGE DR022

Data Request Date: 05/20/24
Due Date: 05/23/24

Name: Trampas Shook
WMP Category: Grid Design, Operations, and Maintenance (.549)
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small (less than 100 items) Quntifiable Goal/target	Base stations	8.1.2.8.3	35	11	Document Review	Please provide documentation and information in regards to (DCRI) program and QA/QC process. Be specific as possible.

DATA REQUEST

Data Request Number: SDGE_DR023

Data Request Date: 05/14/24
Due Date: 5/17/24

Name: John Sniegoski
WMP Category: Grid Design, Operations and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small (less than 100 items) Volume Quantifiable Goal/Target	Switches	WMP Section: 8.1.2.11.1 Initiative: WMP.461	10	10	Document Review	Please provide list of the completed PSPS Sectionalizing Switches installed as referenced in the OEIS_Table 9-5 and WMP.461_Section (8.1.2.11.1) as per Initiative available for review in excel format with threat district, risk area, utility region for each report line for audit review.

DATA REQUEST

Data Request Number: SDGE_DR024

Data Request Date: 05/10/2024
Due Date: 05/15/2024

Name: 8.1.2.8.1 Advanced Protection (WMP.463)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small Volume Quantifiable Goal/Target	Circuits	8.1.2.8.1 Advanced Protection (WMP.463)	5	4	Document Review	Please provide documentation of the 5 circuits targeted in 2023 for advanced protection. For each circuit document(s), indicate Geographical Area, Identification of Circuit, HFTD Tier Classification, Falling Conductor Protection (FCP) status, Sensitive Ground Fault (SGF) Protection status, Sensitive Relay Profile (SRP) Settings, WDD data tracking, and AMI data tracking. Include a document or written response referencing any data from these circuits that was used to calculate risk reduction estimation for advance protection from Table 8-6 of the WMP.

DATA REQUEST

Data Request Number: SDGE_DR024.b

Name: 8.1.2.8.1 Advanced Protection (WMP.463)
WMP Category: Grid Design, Operations, & Maintenance
Company: BVNA

Data Request Date: 05/20/2024
Due Date: 05/23/2024

Program Target	Units	Sections	Target	Actual	Method	Data Request
Small Volume Quantifiable Goal/Target	Circuits	8.1.2.8.1 Advanced Protection (WMP.463)	5	4	Document Review	The list of five locations and their statuses was recieved, however more detailed documentation is required for evaluation of this initiative. Please provide any of the following documents that are available for review at each location: 1. Inspection Reports: Detailed inspection reports for the five specified locations, including the dates of inspection, findings, and any corrective actions taken. 2. Maintenance Records: Records of maintenance activities performed at these locations, particularly those related to the installation and functionality of advanced protection technologies such as Falling

						Conductor Protection (FCP) and Sensitive Ground Fault (SGF) Protection. 3. Technical Documentation: Any relevant technical documentation or field reports that demonstrate the implementation and operational status of the advanced protection technologies mentioned in the WMP. 4. Photographic Evidence: Photographs or videos documenting the current state of the infrastructure and the installed protection devices at each of the five locations. If any of these 4 types of documents are not available, please provide a written response describing why this information is not available.

DATA REQUEST

Data Request Number: SDGE_DR026

Data Request Date: 05/31/2024
Due Date: 06/5/2024

Name: Tatiana Friesen
Email: tatianaf@c2group.us
Phone #: (858) 231-1961
Company: C2 Group

WMP Category: Large Volume Quantifiable Goal/Target - Not Field Verifiable

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management & Inspection	Inspections	8.2.5 - WMP.505 - QA/QC Vegetation Management	79,441	106,041	Documentation	1. Please provide completion data for vegetation management QA/QC for Q1 2023 and Q2 2023 including the "Quarterly Progress" column for completed QAQC. (Quarterly progress for completed QAQC was found in the spatial data for Q3 2023 and Q4 2024.)

DATA REQUEST

Data Request Number: SDGE_DR045

Name: Barbara Tomajic
WMP Category: Initiative List - N/A Targets
Company: BVNA

Data Request Date: 05/15/24
Due Date: 05/20/24

Email: barbara.tomajic@bureauveritas.com
Phone #: (916)514-4511
Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
NA	NA	2023 WMP Initiative List: Target	NA	NA	Revised Excel Spreadsheet	Please provide an updated initiative list and provide direction and/or explanation of those initiatives with Target Goals listed as "N/A". This will assist reviewers in developing future data requests.

DATA REQUEST

Data Request Number: SDGE DR047

Data Request Date: 05/31/24
Due Date: 06/05/24

Name: Trampas Shook
WMP Category: Emergency Preparedness
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Not Categorized by SDG&E Qualitative Review	NA	WMP initiative .1008 Emergency Preparedness plan	N/A	N/A	Document Review	Please provide documentation and information regarding 2023 proposed improvements to the SDGE Emergency Preparedness Plan. Please provide records or standards for program improvements such as regularly scheduled testing, drills or communications in a PDF format.

DATA REQUEST

Data Request Number: SDGE DR048

Data Request Date: 05/31/24
Due Date: 06/05/24

Name: Trampas Shook
WMP Category: Community Outreach and Engagement
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Not Categorized by SDG&E Qualitative Review	NA	WMP.1337 Community Engagement	N/A	N/A	Document Review	Please provide documentation and information regarding Community outreach and education program including statistics for outreach attendance. Please provide in PDF or excel spreadsheet.

DATA REQUEST

Data Request Number: SDG&E DR049

Data Request Date: 5/30/24
Due Date: 6/4/24

Name: Dave Stoddard
WMP Category: Grid Design, Operations and Maintenance
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	NA	Section 4.4.2; 6.7; & 7 - WMP.442 - Wildland Mitigation Strategy Development	Not identified		Document Review	Provide supporting documentation that identifies the summarized risk map with overall ignition probability and estimated wildfire consequence along electric lines and equipment. Documentation may include but is not limited to project milestones, equipment failure reporting, weather stations, Circuit Risk Index, WiNGS-Ops Model documentation, and Probability of Failure and Ignition model. These should be in PDF, Word, and or Excel format.

DATA REQUEST

Data Request Number: SDG&E DR050

Data Request Date: 5/31/24
Due Date: 6/5/24

Name: Dave Stoddard
WMP Category: Situational Awareness & Forecasting
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	WRF Modeling and Situational Awareness Forecasting	.450 - Fire Potential Index Situational Awareness and Forecasting, Section 8.3.6, page 327			Document Review	Provide supporting documentation of the status of the FPI aspects of the Situational Awareness Forecasting and WRF modeling program(s). These documents may include but are not limited to examples of FPI forecast model, examples of comparative analysis of predicted versus observed conditions, etc. Provide a status report on the integration of FPI into OMS for future protective equipment threshold setting improvements. See Table 7-28 on Page 307. These should be in PDF, Word, and or Excel format.

DATA REQUEST

Data Request Number: SDG&E DR051

Data Request Date: 5/31/24
Due Date: 6/5/24

Name: Dave Stoddard
WMP Category: Emergency Preparedness
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	Aviation helicopter(s) and drone(s)	Unidentified section(s); WMP.514 – crew accompanying ignition prevention and suppression resources and services			Document Review	Provide a program or initiative description to confirm this initiative is within the scope of the 2023 WMP Planning Cycle with supporting information, documents and or completed work orders or GIS data submissions. These should be in PDF, Word, and or Excel format.

DATA REQUEST

Data Request Number: SDGE DR052

Data Request Date: 05/31/24
Due Date: 06/05/24

Name: Trampas Shook
WMP Category: Wildfire Mitigation Strategy Development
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Not Categorized by SDG&E Qualitative Review	NA	WMP initiative .523 Allocation methodology development and application.	N/A	N/A	Document Review	Please provide an explanation of the initiative activity and whether the activity is focused on a particular initiative or the overall SDG&E wildfire mitigation strategy.

DATA REQUEST

Data Request Number: SDGE DR053

Data Request Date: 05/31/24
Due Date: 06/05/24

Name: Trampas Shook
WMP Category: Community Outreach and Engagement
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Community Outreach and Engagement	NA	WMP.527 - Public outreach and education awareness program	N/A	N/A	Document Review	Please provide documentation and information regarding the Public outreach and education awareness program in PDF format and include a full description statistics for community outreach.

DATA REQUEST

Data Request Number: SDG&E DR054

Data Request Date: 5/31/24
Due Date: 6/5/24

Name: Dave Stoddard
WMP Category: Emergency Preparedness
Company: BVNA

Program Target	Units	Sections	Target	Actual	Method	Data Request
Qualitative Goal/Target	Aviation helicopter(s) and drone(s)	.557 - Section 8.1.8.3.3 – Aviation Firefighting Program, Page 238			Document Review	Provide supporting documents for the aviation program to include but not limited to verification of FAA certification of resources, SDG&E procedures, readiness of flight operations staff, their roles, training, clarification of the role of unmanned aircraft system(s) within the aviation program, SDG&E analysis of the Aviation Firefighting Program. These should be in PDF, Word, and or Excel format.

DATA REQUEST

Data Request Number: SDGE DR055

Name: Trampas Shook
WMP Category: Emergency Preparedness
Company: BVNA

Data Request Date: 5/31/24
Due Date: 06/5/24

Program Target	Units	Sections	Target	Actual	Method	Data Request
Not Categorized by SDG&E Qualitative Review	NA	WMP.563 - Public emergency communication strategy	N/A	N/A	Document Review	Please provide documentation and information regarding Public emergency communication strategy and preparedness Be as specific as possible

DATA REQUEST

Data Request Number: SDGE_DR060

Name: Tatiana Friesen
WMP Category: Qualitative Goal/Target
Company: C2 Group

Data Request Date: 05/31/2024
Due Date: 06/5/2024
Email: tatianaf@c2group.us
Phone #: (858) 231-1961
Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Community Values at Risk	N/A	5.4.5 - WMP.493 - Environmental compliance and permitting	N/A	N/A	Documentation or SME Interview	Please provide documentation, such as process flows, manuals, or standards, for the environmental review process that ensures all activities that may impact the environment are appropriately reviewed prior to construction and that activities maintain compliance with applicable ordinances, regulations, and laws. **If detailed documentation is not available or easily transmittable, please schedule a SME interview to review and discuss the progress on this initiative.**

DATA REQUEST

Data Request Number: SDGE_DR061

Name: Tatiana Friesen
WMP Category: Qualitative Goal/Target
Company: C2 Group

Data Request Date: 05/31/2024
Due Date: 06/5/2024
Email: tatianaf@c2group.us
Phone #: (858) 231-1961
Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Vegetation Management & Inspection	N/A	8.2.4 - WMP.511 - Vegetation management enterprise system	N/A	N/A	Documentation or SME Interview	Provide a screenshot sample of the new 'Tree Metrics' attribute field created in the tree record level within Epoch, provide the design criteria utilized to implement the auto close Dispatch Work Orders in CityWorks, and any screenshot examples showing the successful migration of the Epoch/Vegetation Management datasets into the AWS data lake. If detailed documentation is not available or easily transmittable, please schedule a SME interview for a live demonstration of the noted systems.

DATA REQUEST

Data Request Number: SDGE_DR062

Name: Tatiana Friesen
WMP Category: Qualitative Goal/Target
Company: C2 Group

Data Request Date: 05/31/2024
Due Date: 06/5/2024
Email: tatianaf@c2group.us
Phone #: (858) 231-1961
Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Grid Design, Operations, & Maintenance	N/A	8.1.5.4.1 - WMP.519 - Centralized repository for data	N/A	N/A	SME Interview	Please schedule a SME interview for a live demonstration of the WMP Data Platform, as described in Section 8.1.5.4.1 WMP.519 of the 2023 WMP.

DATA REQUEST

Data Request Number: SDGE_DR063

Name: Tatiana Friesen
WMP Category: Qualitative Goal/Target
Company: C2 Group

Data Request Date: 05/31/2024
Due Date: 06/5/2024
Email: tatianaf@c2group.us
Phone #: (858) 231-1961
Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Wildfire Mitigation Strategy Development	N/A	5.1.2 - WMP.521 - Documentation and disclosure of wildfire-related data and algorithms	N/A	N/A	Documentation or SME Interview	Please provide screenshot samples of the interface of the WiNGS-Planning and WiNGS-Ops visualization platforms utilized to prioritize grid hardening and support operational decision making during extreme fire weather conditions. **If detailed documentation is not available or easily transmittable, please schedule a SME interview for a live demonstration of the noted systems.**

DATA REQUEST

Data Request Number: SDGE_DR064

Data Request Date: 05/31/2024
Due Date: 06/5/2024

Name: Tatiana Friesen
Email: tatianaf@c2group.us
Phone #: (858) 231-1961
Company: C2 Group

WMP Category: Qualitative Goal/Target

Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Situational Awareness & Forecasting	N/A	8.3.5 - WMP.541 - High-performance computing infrastructure	N/A	N/A	Documentation or SME Interview	Provide sample outputs of the 3-day circuit forecast for each circuit-associated weather station, delineating max gust and time for each day that is issued 72 hours prior to a dangerous fire event. **If detailed documentation is not available or easily transmittable, please schedule a SME interview to review associated documents relating to the ongoing progress of this initiative.**

DATA REQUEST

Data Request Number: SDGE_DR066

Name: Tatiana Friesen
WMP Category: Verification of Funding
Company: C2 Group

Data Request Date: 06/03/2024
Due Date: 6/6/2024
Email: tatianaf@c2group.us
Phone #: (858) 231-1961
Preferred Point of Contact: Email

Program Target	Units	Sections	Target	Actual	Method	Data Request
Verification of Funding	N/A	All WMP Initiatives	N/A	N/A	Document	**IE is requesting additional information from SDG&E for the initiatives listed below and shown in the attached document named SDG&E - Data Request SDGE_DR066_Attach - C2. The IE requests that the response to the following itemized requests 1-4 is included in one detailed file, as shown in the attached document.**
						1. IE is requesting a detailed explanation for the following initiatives, which show the **Expense Actual and Capital Actual** spending being less than 100 percent of the planned budget. A separate explanation is requested for Expense underspend and Capital underspend. - WMP.552 Distribution Drone Assessments

						2. IE is requesting a detailed explanation for the following initiatives, which show the **Capital Actual** spending being less than 100 percent of the planned budget. - WMP.511 Vegetation management enterprise system - WMP.523 Allocation methodology development and application
						3a. Please provide the Planned Capital, Actual Capital, Planned Expense, and Actual Expense for the 25 initiatives listed in rows 8 through 32 (with text highlighted in yellow stating "Not Provided in ARC dated April 1, 2024" in columns D and H) of SDG&E - Data Request SDGE_DR066_Attach - C2. These initiatives that were were listed in the SDG&E Quarterly Data Report Table 11, dated February 1, 2024 but were missing financial data in the SDG&E 2023 WMP Annual Report on Compliance dated April 1st, 2024. **Initiatives:** WMP.443 / WMP.458 / WMP.472 / WMP.493 / WMP.496 / WMP.515 Personnel work procedures and training in conditions of elevated fire risk / WMP.515 Personnel Work Procedures and Training in Conditions of Elevated Fire Risk (Grid Ops) / WMP.553 / WMP.558 / WMP.971 / WMP.1007 / WMP.1009 / WMP.1198 / WMP.1199 / WMP.1200 / WMP.1201 / WMP.1202 / WMP.1203 / WMP.1204 / WMP.1205 / WMP.1206 / WMP.1207 / WMP.1208 / WMP.1209 / WMP.1337 3b. Please provide a detailed explanation for the above initiatives if the Expense Actual and/or the Capital Actual spending is less than 100% of the planned budget.
						4a. IE is requesting clarification on the planned and actual

						spend for several initiatives, as there were noted discrepancies between the SDG&E 2023 WMP Annual Report on Compliance dated April 1st, 2024 and the SDG&E Quarterly Data Report Table 11, dated February 1, 2024. Please provide the planned Capital, actual Capital, planned Expense, and actual Expense for the following initiatives (noted by the red text): - WMP.527 Public outreach and awareness - WMP.563 Public emergency communication strategy - WMP.549 LTE Communication Network (DCRI) - WMP.478 Distribution OH Detailed 4b. Please provide a detailed explanation for the above initiatives if the Expense Actual and/or the Capital Actual spending is less than 100% of the planned budget. A separate explanation is requested for Expense underspend and Capital underspend.

Appendix D – SME Interview Summary

Item No.	2023 WMP Activities	Initiative Category	Initiative Name	SME Name, Title	Interview Date	Summary
1	Qualitative Goal/Target	Grid Design, Operations, & Maintenance	8.1.5.4.1 - WMP.519 - Centralized repository for data	Crystal Bertolini, Business Lead Vikrant Kamble, Data Foundation Team Lead Abhinav Chaturvedi, Data Foundation Team Member Casey Cook, Product Owner GIS	06/04/24	SDG&E walk through of the central repository of the WMP Data Platform that encompassed the data schema and architectural data flow from data collection through WMP reporting with process flows, presentations, and a live demonstration of the data bases, SAP Hana, GIS, and Queries. The information provide showed the input from multiple systems across SDG&E's organization to a centralized platform for consolidation and reporting of WMP targets.
2	Large Volume Quantifiable Goal/Target - Not Field Verifiable	Grid Design, Operations, & Maintenance	8.1.3.9 WMP.489 Transmission OH Inspections (visual - helo patrol) 8.1.3.2 WMP.479 Transmission OH Detailed Inspections	Bernard Sullivan; Team Lead, Transmission Construction Services David Delgado; Senior Anaylst, Transmission and Substation	06/04/24	Based on Data Request DR008.b and Data Request DR010.b to clarify and interpret responses for reports and inspections performed for OH transmissions as pdf reports were not available. Discussion of targets falling short and system changing configurations, work orders deployed, no thermoimaging but examples given, demonstrated EpochField Solution platform and processes and applications. BV understood and

						found satisfactory based on explanation and examples.
3	QA/QC Programs	N/A	8.1.6 Quality Assurance and Quality Control	Lena McMillin, Team Lead, Wildfire Mitigation Program Compliance Kyle Marshall, QAQC Electric Construction Supervisor	06/07/24	Based on DR003.b QAQC overview, Lena mentions that Wings Plannings confirms is the risk modeling tools used. The table in section 66 of the WMP refers to the 3 year program, specific milestones exist for 2023 but require other SME's for detailed discussion. Construction reports and data are given to an inspector for verification with timelines for corrections and audits. Sampling is based on statistical standards and circumstances.
4	Large Volume Quantifiable Goal/Target - Not Field Verifiable	Grid Design, Operations, & Maintenance	8.1.2.11.2 - WMP.468 - Fixed Power Backup	Dylan Gorham, Customer Programs Adviser	06/12/24	Based on DR014 fixed power backup generators for .468 this program is similar to .467 for generator assistance program and clarifications were needed for differences. SME Dylan mentioned that no other hardening initiatives are in place for areas that are planned for underground and will stay away from those locations. Also discussed were topics of medical eligibility not a part of the program, all generators are installed by a certified contractors, goals were exceeded and asset ID's vs meter ID's.

Appendix E – 2023 WMP Funding Verification Summary

Initiative Category	2023 Initiative Number	Initiative Name	2023 O&M Planned	2023 O&M Actual	2023 O&M Variance	2023 O&M Change (%)	2023 Cap. Planned	2023 Cap. Actual	2023 Cap. Variance	2023 Cap. Change (%)	2023 Total Planned	2023 Total Actual	2023 Total Change (%)
Wildfire Mitigation Strategy Development	WMP.442	A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment	$3,597	$3,872	$275	8%	$319	$0	-$319	-100%	$3,916	$3,872	-$44
Wildfire Mitigation Strategy Development	WMP.521	Documentation and disclosure of wildfire-related data and algorithms					$1,503	$2,434	$931	62%	$1,503	$2,434	$931
Wildfire Mitigation Strategy Development	WMP.523	Allocation methodology development and application	$5,291	$5,432	$141	3%	$3,775	$5,215	$1,440	38%	$9,066	$10,647	$1,581
Grid Design, Operations, & Maintenance	WMP.449	Wireless Fault Indicators					$51	$10	-$41	-81%	$51	$10	-$41
Grid Design, Operations, & Maintenance	WMP.453	SCADA Capacitors			$0		$1,885	$1,557	-$328	-17%	$1,885	$1,557	-$328
Grid Design, Operations, & Maintenance	WMP.455	DIST OH Hardening - Covered Conductor	$2,220	$3,319	$1,099	50%	$76,806	$81,553	$4,747	6%	$79,026	$84,872	$5,846
Grid Design, Operations, & Maintenance	WMP.459	Expulsion Fuse Replacement			$0		$93	$50	-$43	-46%	$93	$50	-$43
Grid Design, Operations, & Maintenance	WMP.461	Sectionalizing Devices			$0		$1,837	$2,035	$198	11%	$1,837	$2,035	$198
Grid Design, Operations, & Maintenance	WMP.462	Microgrids	$1,652	$1,105	-$547	-33%	$16,576	$3,197	-$13,379	-81%	$18,228	$4,302	-$13,926
Grid Design, Operations, & Maintenance	WMP.463	Advanced Protection	$300	$194	-$106	-35%	$9,706	$16,298	$6,592	68%	$10,006	$16,492	$6,486
Grid Design, Operations, & Maintenance	WMP.464	Hotline Clamps	$486	$1,642	$1,156	238%					$486	$1,642	$1,156

Initiative Category	2023 Initiative Number	Initiative Name	2023 O&M Planned	2023 O&M Actual	2023 O&M Variance	2023 O&M Change (%)	2023 Cap. Planned	2023 Cap. Actual	2023 Cap. Variance	2023 Cap. Change (%)	2023 Total Planned	2023 Total Actual	2023 Total Change (%)
Grid Design, Operations, & Maintenance	WMP.466	Generator Grant Program	$7,060	$5,407	-$1,653	-23%					$7,060	$5,407	-$1,653
Grid Design, Operations, & Maintenance	WMP.1195	Early Fault Detection	$9	$4	-$5	-60%	$5,612	$6,061	$449	8%	$5,621	$6,065	$444
Grid Design, Operations, & Maintenance	WMP.467	Generator Assistance Program	$1,000	$547	-$453	-45%					$1,000	$547	-$453
Grid Design, Operations, & Maintenance	WMP.468	Fixed Power Backup	$10,350	$12,680	$2,330	23%					$10,350	$12,680	$2,330
Grid Design, Operations, & Maintenance	WMP.473	Strategic Undergrounding	$436	$429	-$7	-2%	$196,200	$174,778	-$21,422	-11%	$196,636	$175,207	-$21,429
Grid Design, Operations, & Maintenance	WMP.475	DIST OH Hardening - Traditional Hardening	$1,800	$1,168	-$632	-35%	$1,985	$6,069	$4,084	206%	$3,785	$7,237	$3,452
Grid Design, Operations, & Maintenance	WMP.478	Distribution OH Detailed	$940	$773	-$167	-18%	$10,408	$8,687	-$1,721	-17%	$11,348	$9,460	-$1,888
Grid Design, Operations, & Maintenance	WMP.479	Transmisson OH Detailed Inspections	$9	$35	$26	294%	$842	$1,537	$695	83%	$851	$1,572	$721
Grid Design, Operations, & Maintenance	WMP.481	Distribution Infrared	$175	$305	$130	74%					$175	$305	$130
Grid Design, Operations, & Maintenance	WMP.482	Transmission Infrared Inspections											
Grid Design, Operations, & Maintenance	WMP.483	Distribution Wood Pole Intrusive	$24	$97	$73	305%	$1,592	$1,328	-$264	-17%	$1,616	$1,425	-$191
Grid Design, Operations, & Maintenance	WMP.484	LiDAR inspections of distribution electric lines and equipment	$1,388	$873	-$515	-37%					$1,388	$873	-$515
Grid Design, Operations, & Maintenance	WMP.488	Distribution OH Patrols	$285	$297	$12	4%	$952	$795	-$157	-17%	$1,237	$1,092	-$145

Initiative Category	2023 Initiative Number	Initiative Name	2023 O&M Planned	2023 O&M Actual	2023 O&M Variance	2023 O&M Change (%)	2023 Cap. Planned	2023 Cap. Actual	2023 Cap. Variance	2023 Cap. Change (%)	2023 Total Planned	2023 Total Actual	2023 Total Change (%)
Grid Design, Operations, & Maintenance	WMP.489	Transmission OH Inspections (visual - helo patrol)											
Grid Design, Operations, & Maintenance	WMP.491	QA/QC Distribution Detailed											
Grid Design, Operations, & Maintenance	WMP.492	Substation Inspections											
Grid Design, Operations, & Maintenance	WMP.519	Centralized repository for data	$1,944	$1,657	-$287	-15%	$11,819	$10,047	-$1,772	-15%	$13,763	$11,704	-$2,059
Grid Design, Operations, & Maintenance	WMP.543	Transmission OH Hardening											
Grid Design, Operations, & Maintenance	WMP.545	Transmission OH Hardening - DUB	$0	$0	$0	0%	$11,397	$14,326	$2,929	26%	$11,397	$14,326	$2,929
Grid Design, Operations, & Maintenance	WMP.549	LTE Communication Network (DCRI)	$1,122	$910	-$212	-19%	$81,274	$75,714	-$5,560	-7%	$82,396	$76,624	-$5,772
Grid Design, Operations, & Maintenance	WMP.550	Lightning Arrestor Replacement			$0		$3,407	$3,432	$25	1%	$3,407	$3,432	$25
Grid Design, Operations, & Maintenance	WMP.551	HFTD Tier 3 Distribution Pole Inspections											
Grid Design, Operations, & Maintenance	WMP.552	Distribution Drone Assessments	$53,171	$52,915	-$256	0%	$80,740	$75,131	-$5,609	-7%	$133,911	$128,046	-$5,865
Grid Design, Operations, & Maintenance	WMP.555	Additional Inspections (69kV TLs in Tier 3)											
Grid Design, Operations, & Maintenance	WMP.972	Avian Protection	$19	$9	-$10	-54%	$2,507	$1,435	-$1,072	-43%	$2,526	$1,444	-$1,082

Initiative Category	2023 Initiative Number	Initiative Name	2023 O&M Planned	2023 O&M Actual	2023 O&M Variance	2023 O&M Change (%)	2023 Cap. Planned	2023 Cap. Actual	2023 Cap. Variance	2023 Cap. Change (%)	2023 Total Planned	2023 Total Actual	2023 Total Change (%)
Grid Design, Operations, & Maintenance	WMP.1016	CNF(Distribution Underground)	$2,070	$672	-$1,398	-68%	$1,183	$620	-$563	-48%	$3,253	$1,292	-$1,961
Grid Design, Operations, & Maintenance	WMP.1017	CNF(Distribution Overhead)			$0		$1,471	$756	-$715	-49%	$1,471	$756	-$715
Grid Design, Operations, & Maintenance	WMP.1189	Strategic Pole Replacement	$130	$0	-$130	-100%	$1,710	$67	-$1,643	-96%	$1,840	$67	-$1,773
Grid Design, Operations, & Maintenance	WMP.1190	Transmission Wood Pole Intrusive Inspections											
Grid Design, Operations, & Maintenance	WMP.1193	QA/QC Wood Pole Intrusive (Dist & Trans)											
Grid Design, Operations, & Maintenance	WMP.1194	QA/QC Substations											
Grid Design, Operations, & Maintenance	WMP.1191	Secondary Inspections of Transmission (QA/QC)											
Grid Design, Operations, & Maintenance	WMP.1192	QA/QC Distribution Drone											
Vegetation Management & Inspection	WMP.494	Detailed Inspections	$44,559	$67,765	$23,206	52%					$44,559	$67,765	$23,206
Vegetation Management & Inspection	WMP.497	Fuels Management Program	$7,011	$5,455	-$1,556	-22%					$7,011	$5,455	-$1,556
Vegetation Management & Inspection	WMP.501	Clearance (enhanced trim or remove)	$10,235	$0	-$10,235	-100%					$10,235	$0	-$10,235
Vegetation Management & Inspection	WMP.505	QA/QC Vegetation Management											
Vegetation Management & Inspection	WMP.508	VM Off-Cycle Patrol (strike potential)											

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Vegetation Management & Inspection	WMP.511	Vegetation management enterprise system					$2,096	$880	-$1,216	-58%	$2,096	$880	-$1,216
Vegetation Management & Inspection	WMP.512	Pole Clearing (brushing)	$6,411	$8,004	$1,593	25%					$6,411	$8,004	$1,593
Vegetation Management & Inspection	WMP.1325	Right Tree Right Place	$1,000	$1,208	$208	21%					$1,000	$1,208	$208
Situational Awareness & Forecasting	WMP.447	Environmental monitoring systems (Advanced weather monitoring)					$416	$206	-$210	-50%	$416	$206	-$210
Situational Awareness & Forecasting	WMP.450	Fire potential index	$3,781	$4,268	$487	13%	$2,426	$1,279	-$1,147	-47%	$6,207	$5,547	-$660
Situational Awareness & Forecasting	WMP.541	High-performance computing infrastructure					$0	$10	$10	100%	$0	$10	$10
Situational Awareness & Forecasting	WMP.970	Air Quality Index	$28	$66	$38	134%	$58	$82	$24	41%	$86	$148	$62
Emergency Preparedness	WMP.514	Crew-accompanying ignition prevention and suppression resources and services	$3,844	$4,639	$795	21%					$3,844	$4,639	$795
Emergency Preparedness	WMP.557	Aviation Firefighting Program	$9,326	$8,014	-$1,312	-14%	$7,960	$3,553	-$4,407	-55%	$17,286	$11,567	-$5,719
Emergency Preparedness	WMP.563	Public emergency communication strategy	$10,168	$10,128	-$40	0%	$3,453	$10,375	$6,922	200%	$13,621	$20,503	$6,882
Emergency Preparedness	WMP.1008	Emergency preparedness plan	$15,052	$19,459	$4,407	29%	$20,286	$16,243	-$4,043	-20%	$35,338	$35,702	$364
Community Outreach and Engagement	WMP.527	Public outreach and education awareness program											
Community Outreach and Engagement	WMP.1337	Community engagement	$505	$435	-$70	-14%					$505	$435	-$70