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August 30, 2024

**VIA ELECTRONIC FILING**

**Docket # 2024-IE**

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

**RE: SDG&E Comments to Independent Evaluator 2023 WMP Annual Report on Compliance**

Dear Program Manager Doherty:

SDG&E hereby provides comments to the Independent Evaluator's (IE) Final Independent Evaluator Annual Report on Compliance (IE Report) on SDG&E's 2023 Wildfire Mitigation Plan (WMP) released on July 30, 2024. SDG&E appreciates the IE's conclusion that "SDG&E has significantly met their 2023 WMP goals of reducing the risk of wildfires in the communities it serves." SDG&E's comments focus on areas of misunderstanding and aim to correct certain inaccuracies in the IE's findings. SDG&E respectfully requests that Energy Safety consider these comments when assessing SDG&E's compliance with its 2023 WMP.

**I. COMMENTS TO SPECIFIC ITEMS WITHIN THE INDEPENDENT EVALATOR REPORT**

**A. 8.1.3.2 Transmission OH Detailed Inspections (WMP.479)**

The IE report incorrectly claims that SDG&E failed to meet the inspection target for transmission overhead detailed inspections due to lack of access, lack of permission, and weather-related complications. As reported in SDG&E's 2023 Annual Report on Compliance, the target for this program was substantially met and the shortcomings in reaching 100% of target are due to the allowable 6-month compliance timeframe for completing transmission detailed inspections. SDG&E uses the midpoint of the 6-month timeframe to forecast when an inspection might occur. In 2023, there were 13 tielines comprising 459 structures with midpoint forecasted completion dates in Q4 2023. Due to the allowable 6-month timeframe, these inspections occurred in Q1 2024 in compliance with SDG&E's CAISO-approved transmission maintenance practice. Therefore, SDG&E substantially met its 2023 target and achieved its intended risk reduction.

## **B. Funding Verification Misused to Determine Whether Risk Reduction Goals Were Met**

The IE determined that SDG&E did not meet risk reduction goals for eight programs due to underspend. However, the determination of whether risk reduction goals are met should be based on substantial completion of the initiative’s target or interim mitigation measures and cannot be determined solely on spend. Based on this understanding, SDG&E states in its 2023 Annual Report on Compliance (ARC) that it did not meet risk reduction goals for only 3 programs – Strategic Undergrounding, Strategic Pole Replacement Program, and Early Fault Detection – and did meet risk reduction goals for the five remaining programs listed below:

- Wireless Fault Indicators
- Expulsion Fuse Replacements
- Microgrids
- Advanced Protection
- Distribution Communications Reliability Improvements

SDG&E urges Energy Safety to reconsider the IE’s determination that SDG&E did not meet risk reduction goals for the five programs noted above, which was based on SDG&E’s underspend. Details on underspend for these programs is provided in SDG&E’s 2023 ARC.

## **C. IE Finding Related to Verification of Funding**

The IE found that SDG&E lacked 2023 planned budget information in its Q4 2023 Quarterly Data Report (QDR) Table 11. While this is true, SDG&E clarifies that it did not provide planned budget information in Table 11 of its Q4 2023 QDR because version 3.2 data template issued by Energy Safety removed the columns that previously contained planned budget information. SDG&E provided its 2023 planned budget information in its 2023 ARC.

## **D. Incorrect Units Reported for 7 Initiatives**

SDG&E notes that the IE report used incorrect units for the following initiatives and provides the correct units in the table below.

Initiative	Incorrect Unit Reported	Correct Unit	Page #
Transmission Wood Pole Intrusive Inspections	Miles	Structures	15
Microgrids	NA	Microgrids	16
QA/QC of Transmission Inspections	Structures	% of Findings	37
Covered Conductor	Inspections	Miles	42
Advanced Protection	No unit specified	Circuits	46
Early Fault Detection	Installations	Nodes	46
Distribution Communications Reliability Improvements (DCRI)	[Detailed Ground] Inspections	Base Stations	47

## II. CONCLUSION

SDG&E thanks Energy Safety for this opportunity to comment on the Independent Evaluator report, and respectfully requests that Energy Safety and the Independent Evaluator take these recommendations into account when considering the report.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for  
San Diego Gas and Electric Company