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VIA ELECTRONIC FILING

Docket # 2023-2025-WMPs

Tony Marino
Acting Deputy Director, Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: SDG&E Comments on the Energy Safety Draft Decision Approving SDG&E's 2025 Wildfire Mitigation Plan Update (Draft Decision)

Dear Acting Deputy Director Tony Marino:

San Diego Gas & Electric ("SDG&E") hereby provides opening comments to the Office of Energy Infrastructure Safety's ("Energy Safety") August 21, 2024, Draft Decision approving SDG&E's 2025 Wildfire Mitigation Plan Update ("WMP Update" or "Plan"). SDG&E greatly appreciates Energy Safety's thoughtful and thorough review of SDG&E's 2025 WMP Update. SDG&E's limited comments focus on one clarification and one request for adjustment of an Area for Continued Improvement ("ACI").

I. COMMENTS ON SPECIFIC AREAS FOR CONTINUED IMPROVEMENT IDENTIFIED BY ENERGY SAFETY

A. SDGE-25U-05 Early Fault Detection Implementation

SDG&E asks Energy Safety to clarify the reference to "SDGE-25B-08" in the required progress section of this ACI. "SDGE-25B-08" is not an existing ACI, and SDG&E assumes this reference should be "SDG&E-25U-04 Continuation of Grid Hardening Joint Studies."

B. SDGE-25U-07 Progress on Inspection QA/QC Program Change

SDG&E requests that Energy Safety consider removing two requirements in ACI SDGE-25U-07. This ACI requires SDG&E to report on progress of program changes for the 2024 year, including tracking of pass/fail rates, description of findings, and modifications to procedures or training. However, SDG&E is currently in the process of modifying its QA/QC program for distribution detailed inspections for implementation in 2025. Accordingly, SDG&E will not have data to provide for QA/QC activities in 2024. SDG&E remains in compliance with Energy

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Safety's reporting requirements per version 3.2 data guidelines and is providing the results of its current QA/QC audits of distribution detailed inspections as described in its approved 2023 - 2025 Base WMP.

In its 2026-2028 WMP, SDG&E can provide an update on the first requirement of this ACI, which is to provide "any modifications made to its QA/QC procedures to properly capture findings, including changes made to how SDG&E defines pass/fail criteria," and a description of how it will track pass/fail rates beginning in 2025. Additionally, SDG&E will routinely report progress made on this program in its four Quarterly Data Report (QDR) submissions in 2025.

II. Conclusion

SDG&E thanks Energy Safety for their thoughtful review and requests that Energy Safety take these recommendations into account in the process of issuing a final approval of SDG&E's 2025 WMP Update.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company