



September 10, 2024

Via Electronic Filing

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Subject: Public Advocates Office's Opening Comments on the Draft Decision Approving San Diego Gas & Electric Company's 2023-2025 Wildfire Mitigation Plan

Docket: 2023-2025-WMPs

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments on the Draft Decision of the Office of Energy Infrastructure Safety (Energy Safety) approving San Diego Gas & Electric Company's (SDG&E) 2023-2025 Wildfire Mitigation Plan. Please contact Nathaniel Skinner (Nathaniel.Skinner@cpuc.ca.gov), Program Manager, or Henry Burton (Henry.Burton@cpuc.ca.gov), Program and Project Supervisor, with any questions relating to these comments.

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

Sincerely,

/s/*Marybelle Ang*

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I. INTRODUCTION

On April 2, 2024, San Diego Gas & Electric Company (SDG&E) filed its *2025 Wildfire Mitigation Plan Update* (2025 WMP Update).¹ On May 7, 2024, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) and other stakeholders filed formal comments on the 2025 WMP Updates of SDG&E and other large utilities.²

On August 21, 2024, the Office of Energy Infrastructure Safety (Energy Safety) issued its *Draft Decision for San Diego Gas & Electric Company 2025 Wildfire Mitigation Plan Update* (Draft Decision).³ The cover letter of the Draft Decision invites interested persons to file opening comments by September 10, 2024 and reply comments by September 20, 2024.

Pursuant to the *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines* (2023 WMP Process Guidelines) and the cover letter of the Draft Decision,⁴ Cal Advocates submits these comments on the Draft Decision. In these comments, Cal Advocates makes the following principal recommendations:

- Energy Safety should revise its directive in Areas for Continued Improvement (ACI) SDGE-25U-01 to require additional reporting related to SDG&E's transition towards utilizing probability distribution within its risk models.
 - Energy Safety should require SDG&E to include a timeline or plan with key milestones and dates for the transition.
 - Energy Safety should require SDG&E to report any changes to the risk models' outputs as a result of using probability distributions.

¹ SDG&E, *2025 Wildfire Mitigation Plan Update*, April 2, 2024 (SDG&E's 2025 WMP Update).

² Cal Advocates, *Comments of the Public Advocates Office on SDG&E's 2025 Wildfire Mitigation Plan Update*, May 7, 2024 in docket 2023-2025-WMPs (Cal Advocates Comments on SDG&E's 2025 WMP Updates).

³ Energy Safety, *Draft Decision for San Diego Gas & Electric Company 2025 Wildfire Mitigation Plan Update*, August 21, 2024 in docket 2023-2025-WMPs (Draft Decision).

⁴ Energy Safety, *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022, (2023-2025 WMP Technical Guidelines).

II. Risk Methodology and Assessment

A. Energy Safety should revise its directive in Areas for Continued Improvement (ACI) SDGE-25U-01 to require additional reporting requirements be implemented.

1. The Draft Decision's current requirements regarding risk model improvements

Energy Safety's Draft Decision directs SDG&E to continue to report on its progress in calculating risk scores as it transitions from the use of maximum consequence values to probability distributions within its Wildfire Next Generation System (WiNGS) risk model.⁵ ACI SDGE-25U-01 states that "In its 2026-2028 Base WMP, SDG&E must continue to report on its progress transitioning to using probability distributions, as outlined in its 2025 WMP Update."⁶ SDG&E must include an overarching roadmap of its wildfire risk planning model updates, including where SDG&E is planning on trialing and implementing probability distributions, any changes to the transition plan, and updates on target implementation dates.⁷

The above requirements aim to improve Energy Safety's understanding of SDG&E's transition towards the use of probability distribution as part of its aggregate risk scores.⁸ Cal Advocates supports the goals of this directive, however, ACI SDGE-25U-01 would benefit from additional reporting requirements.

2. Integration of Wings-Planning and Wings-Operations risk models

Energy Safety's Draft Decision does not address other concerns that relate to vague reported information on risk modeling updates.^{9, 10} In particular, risk modeling updates, such as the incorporation of the WiNGS-Operations methodology into the WiNGS-Planning model

⁵ Draft Decision at 67.

⁶ Draft Decision at 67: ACI SDGE-25U-01, "Calculating Risk Scores using Maximum Consequence Values."

⁷ Draft Decision at 67.

⁸ Draft Decision at 67.

⁹ Cal Advocates, *Comments of the Public Advocates Office on SDG&E's 2025 Wildfire Mitigation Plan Update*, May 7, 2024, (Cal Advocates Comments on 2025 WMP Update) at 3-6.

¹⁰ Green Power Institute (GPI), *Comments of the Green Power Institute on the Group 1 2025 Wildfire Mitigation Plan Updates*, May 7, 2024 (GPI Comments on 2025 WMP Updates) at 12.

should also be accurately reported. The purposes of these two models are quite different.¹¹ The inclusion of the WiNGS-Ops methodology into the WiNGS-Planning model represents how SDG&E will be able to include PSPS risk within the mitigation-selection decision framework. The integration of these two models and the resulting outputs may affect the prioritization of where SDG&E will propose to perform long-term risk reduction work. SDG&E states that its transition to including the WiNGS-Ops methodology into the WiNGS-Planning model will occur sometime during 2024, with any proposed changes to proposed mitigation work appearing during the 2026-2028 WMP cycle.¹² However, SDG&E fails to provide a more specific timeline of key milestones for when this commitment would be fully implemented. Finally, in its 2026-2028 comprehensive WMP submission, SDG&E should report its progress towards incorporating the WiNGS-Ops methodology into the WiNGS-Planning model.

3. Transition to using probability distributions

Energy Safety should require SDG&E to sufficiently explain the progress that it has made, as SDG&E moves towards utilizing probability distribution over maximum consequence to aggregate risk scores. It is crucial that Energy Safety continue to require full transparency from SDG&E on the progress of all changes to its risk models. The transition from maximum consequence towards probability distribution, and how it affects the calculated risk modeling scores for the utilities, remains a complex topic and continues to be a point of concern for Energy Safety and interested stakeholders.^{13, 14, 15, 16} Understanding the transition towards utilizing probability distribution and how it affects SDG&E's risk model and risk scores for a circuit

¹¹ Cal Advocates Comments on 2025 WMP Update at 3:

SDG&E uses the WiNGS-Ops model “to help inform decision makers in real-time about the Wildfire and Public Safety Power Shutoff (PSPS) risks, which will guide risk-based de-energization decisions during risk events.” In contrast, SDG&E describes the WiNGS-Planning model tool as a way to help identify the best deployment of undergrounding and covered conductor for the utility's long term mitigation strategy.

¹² Cal Advocates Comments on 2025 WMP Update at 4.

¹³ Energy Safety, *Decision on 2023-2025 Wildfire Mitigation Plans for San Diego Gas & Electric Company*, October 13, 2023 in docket 2023-2025-WMPs (Final Decision on SDG&E's 2023-2025 WMP) at 80, Areas of Continued Improvement: SDGE-23-02.

¹⁴ Energy Safety's Draft Decision at 67, Areas of Continued Improvement SDGE-25U-01.

¹⁵ Cal Advocates Comments on 2025 WMP Update at 3-6.

¹⁶ GPI Comments on the 2025 WMP Updates at 11-12.

segment, is crucial to understanding and verifying that SDG&E is making the best mitigation prioritization decision.

Energy Safety should require SDG&E to provide updates that detail key milestones and dates related to the probability distribution transition for each of the next three years. These updates should include any changes in model outputs and should be submitted as part of the overarching roadmap, which will allow Energy Safety to determine if the transition has occurred in a timely manner. Including the proposed updates will allow Energy Safety to better track the improvements of SDG&E's operational and planning models and ensure transparency on how SDG&E's integrated risk model is maturing, which is currently missing from Energy Safety's Draft Decision language.

4. Remedies: Energy Safety should revise ACI SDG&E-25U-01.

Energy Safety should revise ACI SDGE-25U-01 as shown below. The proposed additions have been italicized for clarity:

Required Progress: In its 2026-2028 Base WMP, SDG&E must continue to report on its progress transitioning to using probability distributions, as outlined in its 2025 WMP Update. This must include:

- An overarching roadmap of its wildfire risk planning model updates, including where SDG&E is planning on trialing and implementing probability distributions.
 - *As part of this overarching roadmap, SDG&E must include a timeline or plan with key milestones and dates by which implementation of probability distributions as part of its wildfire risk planning model will be achieved.*
 - *These updates should include, at the minimum, reporting on the following two concepts: (1) the incorporation of the WiNGS-Operations Methodology into the WiNGS-Planning model and (2) changes to the Annual FireCast model output.*
- *A description and explanation of any changes in the risk model outputs as a result of the transition to probability distribution (either in the body or in an appendix to the 2026-2028 Base WMP).¹⁷*

¹⁷ Cal Advocates recommends that all findings and changes in data related to the risk model outputs be reported in two appendices in the 2026-2028 WMP. Cal Advocates proposes that the following appendices be included:

- Appendix A: Updates/changes to data related to the incorporation of the WiNGS-Operations Methodology into the WiNGS-Planning model; and

- Any changes to the transition plan.

The proposed additions would strengthen SDGE-25U-01. The additional requirements would provide clarity on SDG&E’s progression on the creation of its one comprehensive risk assessment model. SDG&E should make this information available, since any discussion of updates to its risk model would fall under Section 6, “Risk Methodology and Assessment.”^{18, 19} Therefore, the requirements proposed by Cal Advocates would not be unduly burdensome.

With the additional requirements, Energy Safety can achieve better insight into SDG&E’s risk modeling and will be able to understand changes related to modeling outputs. It will also provide Energy Safety with the ability to better track updates to wildfire risk planning models.

III. CONCLUSION

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

Respectfully submitted,

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- Appendix B: Updates/changes to data related to the Annual FireCast model output.

¹⁸ Draft Decision at 67.

¹⁹ 2023-2025 WMP Technical Guidelines at 30-58.