

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY  
OF THE STATE OF CALIFORNIA**

Office of Energy Infrastructure Safety  
Natural Resources Agency

**COMMENTS OF THE GREEN POWER INSTITUTE ON THE DRAFT  
DECISION ON SDG&E'S 2025 WILDFIRE MITIGATION PLAN UPDATE**

September 10, 2024

Gregory Morris, Director  
Zoe Harrold, Scientist  
The Green Power Institute  
*a program of the Pacific Institute*  
2039 Shattuck Ave., Suite 402  
Berkeley, CA 94704  
ph: (510) 644-2700  
fax: (510) 644-1117  
gmorris@emf.net

## **COMMENTS OF THE GREEN POWER INSTITUTE ON THE DRAFT DECISION ON SDG&E'S 2025 WILDFIRE MITIGATION PLAN UPDATE**

The Green Power Institute (GPI), the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security, provides these *Comments of the Green Power Institute on the Draft Decision on SDG&E's 2025 Wildfire Mitigation Plan Update*.

### **Introduction**

GPI reviewed the OEIS Draft Decision on SDG&E's 2025 WMP Update with a focus on technical revisions as well as opportunities for additional, improved utility guidance. Our comments and recommendations address the following topics:

1. Recommended technical revisions to the Draft Decision on SDG&E's 2025 WMP Update.
2. The Draft Decision misses multiple opportunities to clarify reporting expectations for the forthcoming 2026-2028 WMP filing that could substantially improve WMP quality and efficient review.
3. SDG&E's response to ACI SDGE-23B-14 and its sufficiency suggest that the Maturity Survey should be verified and validated.

### **1. Recommended technical revisions to the Draft Decision on SDG&E's 2025 WMP Update.**

GPI recommends the following technical revisions to the Draft Decision on SDG&E's 2025 WMP Update.

#### **1.1. The Draft Decision Executive Summary should provide a congruent summary of areas that can be further developed or improved.**

The Executive Summary provides a summary of SDG&E's strengths based on the 2025 WMP Update. However, the same section only states that there are areas where SDG&E can improve without providing a summary of what those areas are and why they are critical to cost effective

utility wildfire mitigation according to current best practices.<sup>1</sup> This renders the Executive Summary incongruent in terms of transparent summaries of existing Plan strengths versus weaknesses. We are primarily concerned that this incongruence masks transparency of Plan weaknesses for the public, who's engagement may be more limited to reviewing filing summaries versus the entirety of the 99-page Draft Decision. GPI recommends updating the Executive Summary to include a congruent and more transparent summary of SDG&E's Plan areas for improvement, instead of only highlighting plan strengths.

### **1.2. Provide a record of consultation with CalFIRE and cite CalFire input.**

While the Decision may be the sole action of the OEIS, recommendations from stakeholders serve an important role in the WMP development process by transparently soliciting and integrating external reviews and recommendations. CalFIRE is one such stakeholder. However, CalFIRE consultation has a higher bar compared to other stakeholders in that its consultation is required by law according to Public Utilities Code section 8386.3(a).<sup>2</sup> GPI is appreciative that the OEIS continues to source and integrate feedback from CalFIRE into the WMP review and Decision process in alignment with the statutory requirement. However, since CalFIRE is separate from the OEIS and does not file comments on the WMP review or development process there is no transparent record of CalFIRE input or OEIS integration of CalFIRE input. The delivery method, content, and outcomes of CalFIRE consultation on the WMP process are opaque, and it cannot be confirmed whether, when, or how an information exchange occurred. Comments filed by the California Natural Resources Agency, Department of Fish and Wildlife (CDFW) sets a precedence for state agencies to engage in the WMP review and development process through transparent filings that contain agency-specific recommendations. Similarly, the Wildfire Safety Advisory Board, statutorily created through AB 1054, files formal recommendations on WMP development which OEIS reviews. Subsequent OEIS Decisions inform the public whether the comments and recommendations were included in WMP development and actions (e.g. as plan Decisions, ACI, Revisions Notices, WMP process development, etc.). CalFIRE input and OEIS review and adoption should follow the same transparent, public facing process. GPI strongly recommends that future WMP development,

---

<sup>1</sup> OEIS Draft Decision on SDG&E's 2025 WMP Update, August 21, 2024. p. 1.

<sup>2</sup> Ibid. p. 2.

review, and approval cycles include public CalFIRE comments that create traceable inputs and OEIS adoption decisions. Statutory consultation from CalFIRE on the WMPs should not be exempt from the existing transparent comment, review, and adoption processes guiding WMP development.

**1.3. Appendix D should credit GPI for the Draft Decision to “concur with and incorporate” our comments relevant to ACI SDGE-25-U-08 “Distribution Infrared Inspections.”**

GPI provided comments stating:

SDG&E is lowering its Distribution Infrared Inspection target by 97 percent on account of a low find rate of 0.2 percent. Their target reduction is based on a new strategy to conduct risk informed IR inspections on distribution assets located in the WUI that experience higher loading and as a pilot on CC. GPI appreciates the updated deployment methods intended to increase distribution IR inspection efficiency and effectiveness. SDG&E should report on its findings for both updated Distribution IR Inspection applications and find rates in its 2026-2028 WMP.<sup>3</sup>

Our summary and recommendation are directly echoed in ACI SDGE-25U-08 which states:

In its 2025 WMP Update, SDG&E provided a decrease to its 2025 target for its Distribution Infrared Inspections initiative from 9,532 to 300 structures, a decrease of 97 percent. SDG&E stated that it is modifying this program to focus on circuits with larger loads during peak season due to the low historical find rate of distribution infrared inspections. SDG&E did not commit to analyzing the find rate of the new inspection regime or reevaluating the distribution infrared inspection target on this basis.<sup>4</sup>

The ACI subsequently requires SDG&E to report on condition find rates among other related reporting requirements, akin to our recommendation. Draft Decision Appendix D should be updated to reflect that “Energy Safety concurred with and incorporated” GPI comments, recommending that “SDG&E should provide an update on the find rates of their CC IR inspection pilot and risk-informed WUI IR inspection method in their 2026-2028 WMP.”<sup>5</sup>

---

<sup>3</sup> GPI Comments on the Group 1 2025 WMP Updates, p. 25.

<sup>4</sup> OEIS Draft Decision on SDG&E’s 2025 WMP Update, August 21, 2024. p. 72.

<sup>5</sup> GPI Comments on the Group 1 2025 WMP Updates, p. 25.

#### 1.4. ACI SDGE-25U-05 “Early Fault Detection Implementation” should be reworded for clarity.

The wording used in ACI SDGE-25U-05 is confusing and does not have the same meaning as the “Energy Safety Evaluation” reported for ACI SDGE-23B-10 (Early Fault Detection Implementation). SDGE-23B-10 required “SDG&E to document the performance of deployed EFD in identifying incipient faults, including the number and accuracy of potential incipient faults detected.”<sup>6</sup> The OEIS evaluation of SDGE-23B-10 determines that SDG&E

... misinterpreted the intent on reporting on the accuracy for identifying incipient faults. As part of its evaluation for the success of EFD, SDG&E must provide analysis on the accuracy in terms of the number of incipient faults correctly identified, the number of false positives identified, and the number of potential incipient faults missed by EFD technology through radio frequency and Power Quality data.<sup>7</sup>

The resulting updated ACI SDGE-25U-05 states:

... SDG&E misinterpreted the accuracy of EFD technology, and plans to continue further development of EFD technology.<sup>8</sup>

This statement suggests that SDG&E misinterpreted data on the accuracy of EDF technology. The language used does not indicate that SDG&E misinterpreted the types of accuracy data desired by the original ACI and expected in the 2025 WMP Update. The Draft Decision should be revised accordingly (additions blue underline, removed in red strikethrough):

##### **SDGE-25U-05. Early Fault Detection Implementation**

o Description: As directed in its 2023-2025 WMP decision, SDG&E provided in its 2025 WMP Update an update on the status of its EFD deployment, including the number of incipient faults identified by EFD technology. However, SDG&E misinterpreted what was expected in terms of reporting on the accuracy of EFD technology; ~~and plans~~ Plans to continue further development of EFD technology must be justified with additional accuracy data.

---

<sup>6</sup> OEIS Draft Decision on SDG&E’s 2025 WMP Update, August 21, 2024. p. 30.

<sup>7</sup> Ibid. p. 31.

<sup>8</sup> Ibid. p. 71.

**1.5. Clarify the source of the statement regarding risk mitigation from a second intrusive transmission pole inspection within three years.**

The Energy Safety Evaluation for Asset Inspection targets, objectives, and projected expenditures (Section 8.1.2.3) on transmission wood pole intrusive inspections in the Draft Decision states:

Performing a second intrusive pole inspection within three years is unlikely to mitigate additional risk.<sup>9</sup>

The Draft Decision does not provide adequate context for this statement regarding SDG&E's changes to its Transmission wood pole intrusive inspection frequency or target. The Draft Decision should provide a reference to the external information that this statement is based on or improve the summary to provide context.

**2. The Draft Decision misses multiple opportunities to provide reporting guidance for SDG&E's 2026-2028 WMP filing that could substantially improve Base WMP quality and review.**

Many party comments on the Group 1 2025 WMP Updates, including but not limited to CalAdvocates, CDFW, GPI, MGRA, and RCRC, provide recommendations that would improve the quality and completeness of the forthcoming 2026-2028 "Base" WMPs. Annual WMP filings for the first 3-year WMP cycle on the new year-ahead filing schedule will come to a close with OEIS Decisions on the 2025 WMP Updates. The initial shift to year-ahead WMP filings required the first 3-year cycle to follow a 2-year truncated filing schedule that is cut short by the next 3-year, 2026-2028 "Base" WMP filing in 2025. The truncated 2023-2025 WMP cycle allowed for a shorter interval between Base WMP filings at a time while Utility planning continues to undergo substantive changes to critical WMP elements such as risk modeling methods, model application, and mitigation approaches. Decisions on the 2025 WMP Updates therefore mark a pivotal opportunity for the OEIS to set clear reporting guidance and expectation for individual Utilities in their 2026-2028 WMPs.

---

<sup>9</sup> Ibid. p. 45.

These 2026-2028 WMP reporting recommendations may not fall neatly into the category of reportable changes per the 2025 WMP Update or necessarily qualify as ACI at this time. For example, the lack of information in SDG&E’s 2025 WMP Update on plans to complete hotline clamp replacements through 2026-2028 does not technically constitute a plan “deficit” since they are not required to report on work plans for 2026-2028 until the next year in the Base WMP filing. However, their 2025 WMP Update also “significantly” altered this program’s previous completion date, which is now extended from 2024 through 2028, effectively rolling over the expectation to comprehensively address the updated program plan in the 2026-2028 WMP. Available information on this wildfire mitigation program also highlighted additional unknowns such as the accuracy of the planned system-wide assessment method used to identify remaining hot clamps and when the analysis will be completed, all of which is relevant for comprehensive reporting in the 2026-2028 WMP. WMP development is typically ongoing and is not neatly constrained to 3-year WMP cycles. Providing guidance in the 2025 WMP Decision on what to include in the 2026-2028 WMP that is specifically relevant to SDG&E’s WMP and programs therein could improve Plan comprehensiveness and facilitate an efficient review process. It is also in keeping with the objective of supporting continued WMP maturation and would improve the value of the Draft Decision as well as depth of the Energy Safety evaluation.

This type of utility-specific guidance for the 2026-2028 WMP filing cannot be readily supplanted by formulaic Base WMP Guidelines and requirements. WMP reporting Guidelines are generalized and apply to all utilities without regard for Utility-specific programs or stages of development and plan maturity. For example, while the 2023-2025 WMP Decisions find that the IOUs complied with the environmental compliance and permitting section, CDFW finds that these narrations have gaps unique to each utility such as, risks of overlooking existing regulations, risk of misinterpreting lack of data for absence of sensitive environmental resources, or risk of mitigation project delays due to permit seeking timelines.<sup>e.g.10,11</sup> These recommendations do not fall under the purview of what qualifies as a reportable change in the 2025 WMP Updates nor do they fall under the current criteria for creating an ACI Update. However, this and other utility-specific guidance on what to include in the 2026-2028 WMP

---

<sup>10</sup> CDFW Comments on Southern California Edison’s 2025 Wildfire Mitigation Plan Update, May 3, 2024.

<sup>11</sup> CDFW San Diego Gas & Electric’s 2025 Wildfire Mitigation Plan Update, May 3, 2024.

filings as it relates to ongoing WMP programs and development would likely improve the quality of Base WMPs prior to the review phase. It could also help to reduce the number of data requests required to acquire necessary information, reduce the likelihood of a Revision Notice, reduce the number of ACIs, and could overall provide Utilities with helpful guidance that improves the plan review process and efficiency.

GPI recommends that the 2025 WMP Update Decisions be expanded to include additional utility-specific guidance on what to include in the forthcoming 2026-2028 WMPs. These recommendations can be distinct from ACI and can be geared towards guiding Base WMP completeness and quality that will improve the WMP review process for in-development WMP programs and capabilities (e.g. risk modeling). This additional guidance would improve the impact of the Draft Decision by supporting continued WMP development.

### **3. SDG&E's response to ACI SDGE-23B-14 and its sufficiency suggest that the Maturity Survey should be validated.**

SDGE-23B-14. Equipment Maintenance and Repair Maturity Level required SDG&E to either justify its current equipment maintenance and repair approach or improve its maturity level. Specific recommendations included data informed performance assessments and resulting preventative replacement or maintenance based on factors such as usage and environmental conditions. SDG&E is effectively determined to achieve the preferred level of maturity with its existing methodologies per the Energy Safety Evaluation's determination that its response is sufficient, and no further action is required. Based on this determination GPI is predominantly concerned that the Maturity Level did not correctly reflect SDG&E's methodological maturity. This may be another warning sign that the Maturity Survey is limited in its ability to correctly identify WMP development factors such as whether Utilities are applying current best practices. We therefore reiterate our prior recommendations to "Validate, update, and assess the operationalization value of the Maturity Model Survey."<sup>12</sup>

---

<sup>12</sup> GPI Comments on the Next Iteration of WMP Guidelines, April 5, 2024. pp. 5-13.



## Conclusion

We urge the OEIS to adopt our recommendations herein.

Dated September 10, 2024.

Respectfully Submitted,



---

Gregory Morris, Director  
The Green Power Institute  
*a program of the Pacific Institute*  
2039 Shattuck Ave., Suite 402  
Berkeley, CA 94704  
ph: (510) 644-2700  
e-mail: gmorris@emf.net