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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 Reply 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 reply 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 focuses on the comments submitted by Mussey Grade Road Alliance ("MGRA").

**I. SDG&E's Undergrounding Program Provides a Comprehensive Approach to Wildfire Safety and Reduces Overall Wildfire and PSPS Risk**

While submitting comments on Energy Safety's draft decision approving SDG&E's 2025 Wildfire Mitigation Plan Update, MGRA seems to ignore most, if not all, of SDG&E's reply comments to the 2025 Wildfire Mitigation Plan Update filing. MGRA's overly simplistic misinterpretation is clear with respect to SDG&E's undergrounding mitigation strategy. MGRA states: "SDG&E is reducing only 2% residual wildfire risk with its undergrounding program"<sup>1</sup>

As explained in SDG&E's 2025 WMP Update and SDG&E's Reply Comments to the 2025 Update filing,<sup>2</sup> MGRA's ill-informed conclusion is misleading, inaccurate, and erroneous statement. SDG&E provides comprehensive evidence with supporting analysis demonstrating that its current strategy is designed to significantly and permanently mitigate wildfire risk, achieving a risk reduction closer to 98%, and not a 100% risk reduction by focusing on the 2%

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<sup>1</sup> MGRA Comments at 7.

<sup>2</sup> *Reply Comments of San Diego Gas & Electric Company on the 2025 Wildfire Mitigation Plan Updates* (SDG&E Reply Comments) OEIS Docket#2023-2025-WMPs at pages 8-9.

residual risk after applying operational mitigations like PSPS and System Settings (Sensitive Relay Profile or Sensitive Ground Fault).<sup>3</sup>

While MGRA seems to accept that leaving nearly 49% risk reduction through System Settings and PSPS is sufficient and acceptable, SDG&E aims to minimize reliance on these measures due to their negative impacts on reliability and risks associated with de-energization. These operational mitigations do not offer a permanent reduction in risk to SDG&E's customers, communities, and the environment, especially during extreme fire weather days when the threat of a catastrophic wildfire is highest.

Furthermore, MGRA references the Lawrence Berkeley National Laboratory ICE Calculator tool to estimate costs from power shutoffs. MGRA suggests that by using this tool, the estimates of potential outages due to PSPS de-energizations and system settings will increase significantly, especially when industrial customers are affected.<sup>4</sup> This point effectively refutes MGRA's claims against SDG&E's undergrounding strategy and underscores the necessity of limiting the use of PSPS and system settings as viable and reasonable methods for reducing wildfire risk.

## **II. Conclusion**

SDG&E appreciates Energy Safety's consideration of these reply comments on Energy Safety's draft decision approving SDG&E's 2025 WMP Update. SDG&E requests that Energy Safety dismiss the claims of MGRA and approve SDG&E's 2025 WMP Update in its current state.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for  
San Diego Gas and Electric Company

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<sup>3</sup> SDG&E's 2025 Wildfire Mitigation Plan Update (May 14,2024 (Revision 1)) (SDG&E's WMP Update) at page 56.

<sup>4</sup> MGRA Comments at 6