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October 10, 2024

VIA ELECTRONIC FILING

Docket # 2022-ARC

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

RE: SDG&E Response to the Office of Energy Infrastructure Safety’s Annual Report on Compliance Regarding San Diego Gas & Electric Company’s Execution of its 2022 Wildfire Mitigation Plan

Dear Program Manager Doherty:

SDG&E hereby provides this response to the Office of Energy Infrastructure Safety’s (Energy Safety) Annual Report on Compliance (ARC) regarding San Diego Gas & Electric Company’s (SDG&E) execution of its 2022 Wildfire Mitigation Plan (WMP) released on September 26, 2024. SDG&E appreciates Energy Safety’s conclusion that while SDG&E did not meet all targets for its WMP initiatives, the failure to meet certain targets did not significantly hinder SDG&E’s ability to mitigate its wildfire risk. SDG&E’s brief comments aim to provide additional details regarding certain aspects of Energy Safety’s report and reiterate SDG&E’s concerns that overreliance or overemphasis on outcome-based metrics may not accurately reflect SDG&E’s overall compliance with its WMP targets and objectives.

I. Unaccounted Initiatives and Contradictory Reporting

A. Energy Safety’s 12 “Unaccounted Initiatives” were included in SDG&E’s ARC

Energy Safety reports that it “needed to seek more information from SDG&E on 12 initiatives not included in the EC ARC”¹ and lists those initiatives in *Table 1: SDG&E Unaccounted WMP Initiative Activities*. Energy Safety describes that it needed to seek information on *qualitative* aspects of these initiatives— distinct from quantitative progress - noted in SDG&E’s 2022 WMP Update. SDG&E confirms that the 12 initiatives listed in Table 1 were included in its

¹ 2022 Annual Report on Compliance for San Diego Gas & Electric Company (“2022 ARC”), p. 65.

ARC with progress reported on the *quantitative* target for each initiative. In accordance with Wildfire Safety Division's Compliance Operational Protocols, SDG&E included in its 2022 ARC "an assessment of whether [it] met the risk reduction intent by implementing all of [its] approved WMP initiatives" and described in its introduction to the ARC that risk reduction intent relies on quantitative targets. Therefore, SDG&E did not report on qualitative activities associated with quantitative initiatives, because risk reduction is a function of the quantitative goal. SDG&E did, however, provide progress on qualitative activities associated with qualitative initiatives to demonstrate implementation of those initiatives.

B. Energy Safety's 27 initiatives identified as having inconsistent reporting do not impact the overall accuracy of SDG&E's reporting.

There are 3 general areas where Energy Safety identifies inconsistencies in SDG&E's reporting, as detailed below.

First, in six instances, SDG&E mislabeled WMP section numbers in its QDR tabular data. SDG&E acknowledges that it made errors in manual data entry required for tabular reporting but notes that those errors do not impact the integrity or validity of its reporting.

Second, Energy Safety claims that SDG&E did not include three initiatives in Table 12 of its tabular QDR. SDG&E confirms that Air Quality Index and Avian Protection were reported in Table 12 in rows 47 and 24, respectively. Camera Network was not reported in Table 12 as OEIS data guideline v3.2 and subsequent modification to metrics tables was effectively implemented for Q4 2022 QDR reporting. The change in the data guideline template only allowed for targets in the 2023-2025 WMP cycle. Camera Network was documented per v3.2 guidance, reporting 2022 completions in Table 1. No Camera Network targets were declared for 2023-2025 and thus none were reported in Table 12.

Third, Energy Safety identifies 19 instances where the Independent Evaluator's (IE) ARC contained different actuals than SDG&E's QDR and/or ARC. The differences in actuals reported are insignificant and do not impact the achieved risk reduction. SDG&E's QDR reporting is a snapshot in time of the data it knows to be true at the time of reporting. It is possible and probable that actuals reported in Q4 QDR reporting, due one month following year-end, may change by the time the IE performs its assessment. Because the inconsistencies in reporting are insignificant, SDG&E believes that they are generally due to either lagging completions or unprocessed/unvalidated data unknown to SDG&E at the time of reporting. The one significant inconsistency was due to an inadvertent error that SDG&E explained and corrected in comments to the 2022 IE ARC Report. In that instance, SDG&E provided an incomplete data set in response to a data request from the IE regarding HFDT Tier 3 Distribution Pole Inspections. SDG&E's comments on the 2022 IE ARC Report explaining and correcting the inconsistency were as follows:

The IE notes that it was unable to validate that SDG&E met its goal of 12,268 inspections for HFDT Tier 3 distribution pole inspections. This is due to an inadvertent error in compiling the data initially provided to the IE regarding the initiative. But SDG&E's quarterly reporting and

the data viewed in total show that SDG&E completed its target for this initiative. In response to DR002, SDG&E inadvertently only included 407 inspections completed under one WMP Initiative Tracking ID, but the Distribution Pole Inspections program was actually associated with two WMP Initiative Tracking IDs in 2022. In preparing the initial data for the IE, SDG&E did not include the additional completed pole inspections that were tracked using the second Initiative Tracking ID. The data shows that, in total, SDG&E completed 12,790 inspections, exceeding its 2022 target. The complete data set of 12,790 inspections was provided to the IE via SDG&E's 2022 QDRs and described in SDG&E's Annual Report on Compliance. SDG&E is also providing as an attachment to these comments a revised version of the data request, noting the complete data set of 12,790 inspections. While it is unfortunate that the complete data set was not provided and the IE could not follow up on the information given the limited timeframe to complete the report, SDG&E affirms that it did meet the stated targets for this initiative.

II. Reliance on Outcome Metrics May Not Accurately Reflect WMP Compliance

Energy Safety notes that it accounts for many factors in its assessment of WMP compliance for 2022, including “the ultimate performance of the electrical corporation’s infrastructure relative to its wildfire risk, as measured by changes in the occurrence of events that correlate to wildfire risk.”² As explained in SDG&E’s Comments to Energy Safety’s Draft Annual Report on Compliance for SDG&E’s 2020 Wildfire Mitigation Plan, SDG&E remains concerned that overreliance or overemphasis on outcome-based metrics may not accurately reflect SDG&E’s overall compliance with its Wildfire Mitigation Plan targets and objectives. SDG&E’s overall goal is always to completely prevent utility-related wildfires, but meeting this goal is not necessarily required to meet the WMP compliance standards set forth in Public Utilities Code Section 8386.3.

Consistent with its prior comments on this issue, SDG&E reiterates that Energy Safety should make clear that outcomes, including but not limited to wire down events, unplanned outages, vegetation caused outages, the scope and frequency of public safety power shutoff (PSPS) events, and number of ignitions will be used to inform and enhance the development of future WMP initiatives, not determine whether an electrical corporation has performed according to its past WMP. Over its decade of wildfire mitigation efforts, SDG&E has repeatedly demonstrated its commitment to implementing measurable, effective, and dynamic wildfire mitigation initiatives aimed at reducing the risk of infrastructure-related ignitions and the impacts of PSPS events. Whether SDG&E performed the actions outlined in its WMP forms the basis for the standard of compliance established in Public Utilities Code Section 8386.3(c).³ Application of post-hoc outcome analysis leaves the electrical corporations’ compliance in a state of uncertainty and dependent upon factors far outside the utilities’ control, including weather conditions and fuel moisture.

² 2022 ARC, p. 45.

³ See SDG&E Opening Comments to Energy Safety’s Draft Annual Report on Compliance for SDG&E’s 2020 Wildfire Mitigation Plan, Docket No. 2020-ARC (Dec. 13, 2022).

III. CONCLUSION

SDG&E thanks Energy Safety for this opportunity to respond to its Annual Report on Compliance regarding SDG&E's execution of its 2022 WMP.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company