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VIA ELECTRONIC FILING

Docket # WMP-Guidelines

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

RE: San Diego Gas & Electric Company's Comments on Draft 2026-2028 WMP Guidelines Package 1

Dear Acting Deputy Director Marino:

San Diego Gas & Electric ("SDG&E") hereby provides comments addressing the Draft 2026-2028 Wildfire Mitigation Plan ("WMP") Guidelines Package 1 ("Draft Guidelines") issued by the Office of Energy Infrastructure Safety ("Energy Safety") on November 12, 2024. SDG&E generally supports the approach of the Draft Guidelines, however, there are areas that would benefit from additional clarity and others that require revision to ensure that the 2026-2028 WMP continues to efficiently and effectively promote the ongoing reduction on utility-related wildfire risk. SDG&E specifically recommends that Energy Safety adopt a filing schedule that accommodates other deliverables as well as a reinstatement of the Change Order Process.

I. COMMENTS

A. TIMING AND SUBMISSION OF THE WMP

To ensure compliance with the guidelines and provide a comprehensive and detailed WMP, SDG&E requests a defined and consistent schedule with adequate deliverable timelines from Energy Safety. To appropriately respond to the multiple reports that are required, particularly the 2026-2028 WMP, fourth Quarter/year-end Quarterly Data Report, and the Annual Report on Compliance, SDG&E encourages Energy Safety to develop a timeline that allows sufficient time to satisfy all.

- SDG&E proposes the below schedule for submitting the 2026 – 2028 Base WMP
- Mid March: WMP pre-submission
 - Early May: Final WMP submission

B. REMOVAL OF THE REQUIREMENT FOR QUANTITATIVE TARGETS IN SECTION 12: ENTERPRISE SYSTEMS

Enterprise systems relating to vegetation management, asset management and inspection, grid monitoring, ignition detection, weather forecasting, and risk assessment are considered foundational to supporting wildfire mitigation efforts. While SDG&E agrees with the concept of establishing qualitative targets for its enterprise systems, quantifying risk reduction for these operational foundations is neither feasible nor beneficial because these systems have no direct impact on risk drivers. Therefore, SDG&E recommends that Energy Safety refrain from requiring quantitative targets related to enterprise systems.

C. REMOVAL OF THE REQUIREMENT OF VEGETATION MANAGEMENT PROCEDURES IN SECTION 9.2.1.2: PROCEDURES

The Draft Guidelines include a new requirement to provide work procedures for vegetation management, however, there have been no issues concerning the management or implementation of vegetation management activities per SDG&E's WMP. Vegetation Management procedures are scrutinized during the Substantial Vegetation Management Audit, and available via data requests as necessary. The requirement to add these procedures to the WMP is thus redundant and increases the burden of the WMP preparation and review overall. SDG&E requests that these new requirements be removed and addressed through alternative means.

D. REMOVAL OF VEGETATION MANAGEMENT TARGET UNIT RESTRICTION IN SECTION 9.1.2

Restricting Vegetation Management target units to circuit miles instead of allowing targets to continue to be reported on by individual asset or inspection count provides less granularity and specificity, thus forcing a backward progression into the understanding and use of data. SDG&E therefore requests the ability to report vegetation management target units by individual asset or inspection, as an alternative to the circuit miles currently envisioned in the Draft Guidelines.

E. PROVISION OF NOTE 1 AND NOTE 2 REFERENCED IN TABLE 8-2

Table 8-2 references Note 1 and Note 2 in columns entitled Frequency or Trigger and Method of Inspection, respectively, but notes are not provided. SDG&E requests clarification or associated notes referenced in Table 8-2.

F. MODIFICATION OF DESIGN BASIS AND EXTREME-EVENT/HIGH UNCERTAINTY SCENARIOS

Section 5.3.1, Design Basis Scenario requires that for weather conditions used in calculating fire behavior the electrical corporation must use probabilistic scenarios based on 30-year history of fire weather. Currently, SDG&E evaluates fire behavior scenarios for 125 days (from 2013 to 2021), representing the worst fire weather days within its service territory. These days are selected and reviewed by subject matter experts from the Meteorology, Fire Science, Engineering, and Risk Analytics groups. The 30-year history of fire weather data is used in multiple data products (i.e., Fire Potential Index (FPI), Santa Ana Wildfire Threat Index (SAWTI), wind gust machine learning models) across SDG&E to support, inform, and enhance decision-making processes related to weather and fire risk management, operational planning, and safety measures. SDG&E suggests modifying this requirement to state: *For weather conditions used in calculating fire behavior, the electrical corporation should use probabilistic scenarios based on either historical fire weather data or a simulated 30-year history of fire weather.*

Section 5.3.2, Extreme-Event/High Uncertainty Scenarios, requires the assessment of the entire service territory, which is expanded from the current assessment of overhead lines in HFTD. SDG&E believes that assessing extremely low-probability events—including those that may be unrelated to wildfire risk and outside the HFTD—offers minimal benefit, as such events are unlikely to provide significant information for mitigation prioritization. Additionally, conducting these types of analyses would require substantial coordination with other agencies to define scenarios, validate inputs, establish credible modeling parameters, model results, and ensure comprehensive evaluation.

Furthermore, SDG&E will submit its Climate Adaptation and Vulnerability Assessment (CAVA) to the California Public Utilities Commission alongside the Risk Assessment and Mitigation Phase (RAMP) report in May 2025. SDG&E's CAVA will include an in-depth discussion of future climate scenarios and their implications for wildfire risk. SDG&E believes the CAVA, which covers comprehensive climate risk issues, is the more optimal venue for his analysis.

Therefore, SDG&E requests modifying this requirement to allow electrical corporations discretion as to whether to incorporate these extreme scenarios. Specifically, SDG&E proposes modifying the first sentence of this section to state: "In this section, if the electrical corporation chooses to incorporate Extreme-Event/High Uncertainty Scenarios, it should identify the scenarios considered in its risk analysis."

G. CHANGES TO THE WMP BASED ON NEW CIRCUMSTANCES AND INFORMATION SHOULD BE INCLUDED

SDG&E is appreciative of the addition of the new Petition to Amend process that will help address alignment with WMP submittals and California Public Utilities Commission (CPUC) decisions in General Rate Cases (GRCs)¹. The Petition to Amend is an important and necessary process to allow for alignment between the WMP and GRC, given the bilateral regulatory oversight processes for wildfire safety and cost recovery for wildfire mitigation initiatives. But, as Energy Safety has previously recognized through the existing change order process, there may be circumstances outside of a GRC decision that merit a change to WMP initiatives or targets. In eliminating the change order approach, the Draft Guidelines fail to address all instances where an electrical corporation, ratepayers, or other stakeholders might benefit from changes to an approved WMP. These could include changes to risk analyses, new data or information, or changes to regulatory requirements.

The objectives of the current change order process is to facilitate the continued reduction of wildfire risk in an efficient and effective manner. Energy Safety acknowledges that the approach described in the originally filed Base WMPs can change as electrical corporations gain experience and measure mitigations' outcomes.² To achieve the overall benefit of cost-effective and efficient wildfire mitigation, Energy Safety should continue to allow for submission of change order requests consistent with the 2023-2025 WMP Guidelines. It is unreasonable to overly restrict changes to the approved WMP over a three-year cycle to only those initiatives impacted by a GRC decision, given the likelihood of new information coming to light regarding climate impacts, wildfire risk, and cost benefit analyses. Further, SDG&E is concerned that the uncertainty arising from deferring these issues to an after-the-fact compliance analysis would disincentivize changes to WMP programs that might result in additional risk reduction and savings to ratepayers.

A change order process is also consistent with the recent Executive Order from Governor Newsom that directs Energy Safety, in conjunction with the CPUC, to work towards "adjustments to utility wildfire safety oversight processes, procedures, and practices that would yield administrative efficiencies and focus utility investments and activities on cost-effective wildfire mitigation measures that reduce wildfire ignition risk while managing costs to electric ratepayers."³ Reinstating the Change Order process would align with the guidance of this Executive Order by allowing ECs the flexibility to pivot strategies, without impacting risk reduction, for various reasons, including finding efficiencies that can lead to ratepayer savings.

¹ *Office of Energy Infrastructure Safety's Draft Mitigation Plan Guidelines (Package 1)* (November 12, 2024) at Pgs. 158-159, OEIS Docket No WMP-Guidelines

² *Office of Energy Infrastructure Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines* (December 6, 2022) at Pgs. 22-28, OEIS Docket No 2023-2025-WMPs

³ EXECUTIVE ORDER N-5-24, October 30, 2024 <https://www.gov.ca.gov/wp-content/uploads/2024/10/energy-EO-10-30-24.pdf>

SDG&E respectfully requests a reinstatement of the Change Order Process, and an expansion of those guidelines to allow ECs to request changes to targets that account for shifts in work between years within a WMP cycle. SDG&E also requests that change order decisions be subject to traditional due process rules which allow for issuance of a draft decision, party comments and then a final decision.

II. CONCLUSION

SDG&E requests that Energy Safety take these recommendations into account in the Final 2026-2028 WMP Guidelines.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company