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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 Reply Comments on Draft 2026-2028 WMP Guidelines Package 1**

Dear Acting Deputy Director Marino:

San Diego Gas & Electric ("SDG&E") hereby provides reply 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.

**I. REPLY COMMENTS**

**A. Cal Advocates recommendation for the six California utilities to stagger submissions for comprehensive WMPs and WMP Updates should be considered more thoughtfully.**

The Public Advocates Office at the California Public Utilities Commission ("Cal Advocates") recommends changes to the anticipated scheduling timeframe and asks that three utilities submit comprehensive base WMPs and the other three submit WMP Updates in 2026. While SDG&E generally supports consideration of changes to WMP submission schedules to promote efficiencies, Cal Advocates' proposal is not reasonably tailored to achieve those efficiencies and align with the RAMP and GRC proceedings. SDG&E supports changes to the schedule to better harmonize review of both the WMP and associated costs at Energy Safety and the California Public Utilities Commission ("CPUC") but believes that these changes should be made within a legislative framework and not through the annual WMP Guideline process. Thus, SDG&E asks that Energy Safety consider Cal Advocates' recommendation in

collaboration with the CPUC and the utilities and to reserve scheduling changes for future legislation.

**B. Cal Advocates' recommendation for additional cost reporting<sup>1</sup> is not feasible and unreasonably extends the scope of the WMP review.**

Given the timeframe for submitting the 2026-2028 Base WMP, it is not feasible for utilities to report actual recorded costs for the previous WMP cycle – in this case 2023-2025 cycle - because the cycle has not ended. Utilities do report actual historical costs associated with each plan year in their year-end Quarterly Data Report (“QDR”) and Annual Report on Compliance. Therefore, SDG&E asserts that this recommendation is not feasible for the WMP cycle in its entirety and is duplicative year by year.

Moreover, Cal Advocates' request for actual cost data alongside prior GRC authorized levels unreasonably expands the scope of the WMP review process by Energy Safety and is duplicative of reporting that exists at the CPUC. SDG&E and other investor-owned utilities already report this data in the annual Risk Spend Accountability Reporting (RSAR) process, and Cal Advocates has access to these reports. Further, due to the current lack of alignment between the GRC and WMP cycles for the IOUs, reporting this in the WMP process may lead to unnecessary confusion. Given the already significant size of the Base WMPs, Energy Safety should decline to further expand reporting on matters where existing reporting is sufficient.

**C. Cal Advocates' recommendation to include smaller, non-catastrophic ignitions in Table 4-2<sup>2</sup> is misplaced and duplicative.**

The intent of Table 4-2 and Section 4.2 altogether is to discuss catastrophic wildfire history in the utility's service territory. Cal Advocates' request to present smaller, non-catastrophic ignition data is already covered by Table 3-1 in Section 3.4 as it relates to wildfire risk drivers and presents a comprehensive understanding of wildfire risk. Furthermore, these smaller reportable ignitions are provided spatially and tabularly in utilities' QDRs consistent with the data guidelines and would not have associated data that is required in Table 4-2 such as fire name, fatalities, structures destroyed, and financial loss. SDG&E notes that the utilities also report on smaller fires annually to the CPUC, and addition of this information to Table 4-2 and Section 4.2 is again duplicative of existing reporting.

Furthermore, the utilities are not the arbiter of the cause of a fire, which is the province of fire agencies such as CAL FIRE. Since fire investigations may take years, or the cause of small fires may remain undetermined, cause determination should come from the fire agency having jurisdiction and not be requested from the utility on an annual basis. The utility's understanding of what may have caused an ignition might

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<sup>1</sup> Cal Advocates Comments at 7.

<sup>2</sup> Cal Advocates Comments at 12.

contradict the agencies with authority or be viewed as an attempt to influence an investigation on larger fires. Therefore, SDG&E recommends that causal data be sought from or provided by appropriate jurisdictional agencies.

## **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