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**VIA ELECTRONIC FILING**

**Docket # Data Guidelines**

Shafi Mohammed  
Chief Data Officer, Data Analytics Division  
Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**RE: SDG&E Comments on Draft Data Guidelines v4.0**

Dear Chief Data Officer Mohammed:

San Diego Gas & Electric (“SDG&E”) hereby provides comments addressing the Draft Data Guidelines v4.0 (“Draft Guidelines”) issued by the Office of Energy Infrastructure Safety (“Energy Safety”) on November 19, 2024.

### **I. Data Guideline Review Requirements**

SDG&E asks Energy Safety to provide all components of the Quarterly Data Report (“QDR”) when releasing an updated version of guidelines so there is adequate time to review, address remaining questions, and adhere to new requirements. The Geodatabase (“GDB”) templates and spatial status report spreadsheet have not yet been provided. The absence of these required forms in early guideline development may cause additional iterations resulting in a delay of final guideline approval.

### **II. Revisions to Previously Submitted Data**

SDG&E strongly urges Energy Safety not to require the revision process as it is currently written in v4.0 of the Draft Data Guidelines. Found in section 2.4 *Revisions to Previously Submitted Data*, the Data Guidelines instruct that, when an electrical corporation becomes aware of a need for revisions to previously submitted data, the electrical corporation shall provide the revisions by the next quarterly submission date.<sup>1</sup>

SDG&E has concerns regarding the guidelines as operations are dynamic and changes to the grid are constant and inevitable. Consequently, the data included in quarterly

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<sup>1</sup> See Energy Safety Data Guidelines Version 3.2 (Jan. 30, 2024) page 7 (“Revisions to Previously Submitted Data.”); Energy Safety Draft Data Guidelines Version 4.0 (Nov. 19, 2024) at 8.

reports represents a snapshot in time and is subject to change as part of normal operations. These changes may occur for several reasons, including:

- Ongoing mapping or data being added into systems of record
- Incidents still under investigation receiving more up-to-date data inputs
- Finding and correcting grid conditions
- Additional reviews, quality control checks, or field verification for newly completed work
- Continuous changes to the grid, such as the addition or removal of customers and assets

Under the current guidelines, electrical corporations would need to resubmit revised Risk Event feature datasets for all previous submissions with every new quarterly submission. This process would require recreating and resubmitting data repeatedly, even for historical reports, which is neither practical nor feasible within the timeframe allocated to produce Quarterly Data Reports.

For example, in the *Unplanned Outages* dataset, the field *Customer Count* seeks the total number of customers impacted by an outage. This figure is derived dynamically from the customers tied to the assets involved in the outage. If, later in the year, new customers are added to the affected assets, recreating a historical report would yield a higher customer count for that outage. Thus, the quarterly snapshots Joint Utilities produce and share with Energy Safety represent an accurate reflection of outages at the time of the report's preparation. Recreating and resubmitting these reports due to ongoing data evolution would result in an endless cycle of revisions, with no practical way to meet reporting deadlines.

Since the inception of quarterly WMP reporting, there have been 18 submissions, and this number will continue to grow. Recreating and resubmitting such a volume of data each quarter would be unmanageable and would likely lead to diminished utility for Energy Safety, which would be inundated with cumulative submissions.

### **An Alternative Proposal to Provide Accurate and Up-to-Date Data**

To address the challenge of providing Energy Safety with the most accurate and up-to-date information, SDG&E proposes that Energy Safety revise its guidelines to adopt cumulative reporting for Risk Event data. Under this approach:

- The Q1 submission would cover data from January to March.
- The Q2 submission would include data from January to June.
- The Q3 submission would cover January to September.
- The Q4 submission would encompass the entire calendar year (January to December).
- In the following year, the Q1 submission would span October through March, and this cycle would repeat.

This approach would ensure that Energy Safety receives a single, comprehensive GDB file each quarter with the most current information while eliminating the need for multiple resubmissions. Such a streamlined process would improve efficiency for both electrical corporations and Energy Safety while maintaining the accuracy and integrity of the data.

Given that data produced each quarter represents a snapshot in time, the only way to ensure all changes are known and communicated later under the current Data Guidelines would be to recreate and compare every previous submission for all electrical corporations every quarter. Energy Safety would receive hundreds of GDB files covering 18 and counting different submission dates every quarter. SDG&E suggests Energy Safety revise their Data Guidelines to allow the quarterly submissions to reflect cumulative, year-to-date quarterly reporting for the Risk Event, PSPS Event, and Initiative feature datasets. This will prevent the need to resubmit last quarter's submission every quarter and allow electrical corporations to focus efforts on the current report.

### **III. Submission Schedule**

As per Section 2.1, there is a discrepancy in the timing of the Annual WMP deliverable. Table 3 indicates "3 days prior to Base WMP or WMP Update submission"; however following the table states "The electrical corporation must submit the annual-WMP data 30 days prior to the submission of the corresponding Base WMP or a WMP Update." SDG&E requests confirmation that the Annual WMP data tables will be submitted 3 days prior to the Base WMP or WMP Update.

### **IV. Geodatabase Changes**

#### **A. Section 3.6.3.2 - Camera**

SDG&E requests to correct the spelling mistake to on the modified field from "SupportAssetID" to "SupportAssetID" and to ensure the geodatabase reflects the same naming.

#### **B. Section 3.6.3 - Initiatives**

SDG&E requests to have "UnitsRepresented" added to all Initiative Feature Classes given the "QuarterlyProgress" field has been removed. It was only added to GridHardeningPoint and AssetInspectionPoint; however, SDG&E uses the QuarterlyProgress field for all Initiative Feature Classes to identify the units as per previous guidance from OEIS. SDG&E uses the sum of the QuarterlyProgress (future UnitsRepresented) to create totals (i.e. by quarter, year) for all feature classes. The total by Quarter YTD is how the Table 1 Cumulative Actuals are calculated. This is performed for all unit types whether it be by miles (Grid Hardening Line), or by tree inspected

(Vegetation Inspections) and is a key field in the data model to have the ability to specify units on any type of initiative.

#### **C. Section 3.6.3.6.2 - Vegetation Management Project Line**

The ChangeOrder field was removed from all Initiative Feature Classes with the exception of Vegetation Management Project Line. SDG&E requests to have this field removed as it does not align with the Change Log provided.

#### **D. Section 3.6.6.3 - Unplanned Outage**

SDG&E requests clarification on the new value of "N/A" added to the "IsolationDeviceType" field for Unplanned Outage as there should always be an isolation device and this value would not be applicable.

### **V. Non-Spatial Changes**

#### **A. Annual WMP**

The template provided has incorrect metric numbers. As it is the Annual WMP, the first character should be changed from 1 to 2.

### **VI. Previously Requested Changes**

The following items have been previously brought up to OEIS in the August 26, 2024 meeting. SDG&E reiterates its request for the below changes.

#### **A. Section 3.6.4.3 - High Wind Warning Day**

SDG&E requests to have the field "FireWeatherZoneID" added to align with RedFlagWarningDay attributes. It is required to map the HWW records to the FireWeatherZone Polygon; however, there is no ID associated with it in the record.

#### **B. Section 3.6.3.2 - Grid Hardening Line**

SDG&E requests to have the field "AssetLocation" changed back to "AssetOHUG" and the associated values to align with the parent feature class: Primary, Secondary and Transmission Line. All these feature classes have the field "AssetOHUG" and have 2 domain values: Overhead, Underground. In this case, AssetLocation will never have the value of "Surface (Padmount)" as it is not applicable to line features.

### **VII. Conclusion**

SDG&E requests that Energy Safety take these recommendations into account in the Final Data Guidelines v4.0.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for  
San Diego Gas and Electric Company