San Diego Gas & Electric
2025 Change Order Request

January 27, 2025

Electronic Filing

OEIS Docket No. 2023-2025-WMP

I. Change Order

a. Introduction and Background

The Office of Energy Infrastructure Safety's (OEIS or Energy Safety) 2023-2025 Wildfire Mitigation Plan (WMP) Process Guidelines require utilities to submit a change order report if an electrical corporation seeks to change an initiative's risk by an increase or decrease of 25% in specific initiative categories delineated by the guidelines.[1] Energy Safety has also previously approved change order requests during the 2023-2025 WMP plan years based on updated understanding of requirements and targets resulting from the electrical corporation's current ratesetting proceeding.[2]

Energy Safety issued a final decision approving San Diego Gas and Electric Company's (SDG&E) 2023-2025 Base WMP on October 13, 2023.[3] SDG&E submitted a change order request on November 1, 2023, requesting revisions to 2024 targets (2024 Change Order Request). Energy Safety subsequently requested that SDG&E resubmit its Change Order Request to better reflect Energy Safety's intended purpose of the change order process.[4] SDG&E submitted a revised Change Order on December 19, 2023.[5] On May 31, 2024 Energy Safety approved in part and rejected in part SDG&E's request to change its 2024 WMP targets.[6] The decision approved the Strategic Pole Replacement request, but rejected eight other requests based on the rational that the proposed changes did not reduce risk.

Consistent with Energy Safety's 2023-2025 WMP Process Guidelines and past decisions addressing change order requests, SDG&E herein requests the below described revisions to its 2024 and 2025 WMP targets. Energy Safety should approve the requested revisions as they reflect alignment with SDG&E's Test Year 2024 General Rate Case (GRC) decision, as further addressed below.[7]

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[1] *Office of Energy Infrastructure Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines* (December 6, 2022) at 22-28.

[2] *Energy Safety Decision on Pacific Gas and Electric Company's (PG&E) Change Order Request in relation to its 2023-2025 Base WMP* (May 31, 2024) (2024 PG&E Change Order Decision), Table 1 at 3-10.

[3] *Decision on SDG&E Change Order Request* (May 31, 2024)

[4] *Energy Safety Response to SDG&E's Request to Resubmit its November 1, 2023 Change Order Request* (December 14, 2023).

[5] *Energy Safety Decision on SDG&E 2023 Change Order Report* (December 19, 2023) and Attachment, available at (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56078&shareable=true;

https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56079&shareable=true), both accessed January 31, 2024.

[6] *Decision on SDG&E's Change Order Request in relation to its 2023-2025 Base WMP* (May 31, 2024).

[7] SDG&E also notes Governor Newsom's recent Executive Order N-5-24, which, among other things, encouraged utilities to consider affordability measures while not compromising safe operations of its grid. The Executive Order urges flexibility to pivot strategies to help find efficiencies that lead to rate payer savings without unnecessarily compromising risk reduction.

b. Summary

Cost recovery for the initiatives described in SDG&E's 2023-2025 WMP, specifically for 2024 and 2025, was addressed by the California Public Utilities Commission (CPUC or Commission) in SDG&E's GRC Application (A.) 22-05-016. SDG&E's requested wildfire mitigation cost forecasts for 2024, filed in 2022, formed the basis for the development of SDG&E's original 2024 and 2025 WMP initiatives and targets. In 2023, SDG&E requested CPUC approval of a Settlement Agreement with California Public Advocates Office on various issues in its GRC (Settlement Agreement), including SDG&Es wildfire mitigation costs. The Settlement Agreement proposed agreed-upon reductions in both capital and O&M requested spend for various WMP initiatives in 2024-2027. SDG&E's 2024 Change Order Request sought Energy Safety's approval to align 2024 WMP targets with the cost reductions outlined in the Settlement Agreement. While Energy Safety did not approve some of the requested changes, SDG&E understands that Energy Safety may reconsider certain requests in light of a final decision in a General Rate Case.[8]

On December 23, 2024, the CPUC issued a final decision in SDG&E's GRC, rejecting the proposed Settlement Agreement with respect to wildfire mitigation costs and adopting several significant cuts to SDG&E's requested wildfire mitigation capital costs. Further, while the CPUC authorized a post-test year mechanism to facilitate the growth of capital costs for some of SDG&E's wildfire mitigation hardening programs, the Commission did not authorize a similar mechanism for all wildfire mitigation costs. Ultimately, the Commission failed to authorize costs in alignment with SDG&E's 2023-2025 WMP, necessitating the requested changes to initiatives and targets described in this request.[9] The GRC Decision also noted "...that SDG&E's current approved WMP may be modified based on this decision, as Energy Safety may authorize WMP changes to align the utility's WMP with a ratesetting proceeding."[10] Based upon this guidance from the Commission as well as past Energy Safety precedent, SDG&E is submitting this Change Order requesting to update its 2024 targets retroactively and its 2025 targets and projected expenditures.

SDG&E acknowledges that this GRC Decision has profound impacts on future years beyond this WMP cycle, which concludes in 2025, and beyond the GRC cycle that concludes in 2027. SDG&E remains steadfast in its commitment to reduce the risk of utility-related wildfire and enhance the safety of its customers, communities, and employees. To the extent possible, this Change Order takes into account an evolving, long-term wildfire mitigation strategy in line with the goals of safe, affordable electric service and preparing the grid for extreme weather and ongoing climate resilience.

The table below presents initiatives for which SDG&E is requesting a target change consistent with authorized funding discussed above. A discussion describing the rationale for each requested target change is provided in Sections 1 and 2 below. Section 3 offers a brief discussion on the impacts of the requested changes on risk reduction. See Attachment A for a complete listing of SDG&E's revised WMP portfolio including initiative targets and projected capital and O&M spend.

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[8] *See*, 2024 PG&E Change Order Decision.

[9] Decision (D.) 24-12-074 Decision Addressing the 2024 Test Year General Rate Cases of Southern California Gas Company and San Diego Gas & Electric Company (GRC Decision).

[10] *Id.* at 468.

WMP Initiative	Unit	Original Target	Requested Target
2024 Requested Changes			
Distribution Communications Reliability Improvements (WMP.549)	base stations	60	5
Standby Power Program (WMP.468)	generators	300	45
Drone Assessments (WMP.552)	inspections	13,500	6,500
Distribution Infrared Inspections (WMP.481)	inspections	9,532	300
Fuels Management (WMP.497)	poles	500	150
2025 Requested Changes			
Strategic Undergrounding (WMP.473)	miles	125	28
Covered Conductor (WMP.455)	miles	40	50
Transmission OH Hardening	Miles	4.64	2
Distribution Communications Reliability Improvements (WMP.549)	base stations	42	5
Drone Assessments (WMP.552)	inspections	13,500	6,500
Lightning Arrester Removal/Replacement (WMP.550)	lightning arresters	1,848	90
Connectors, including hotline clamps (WMP.464)	hotline clamps	950	100
Avian Protection (WMP.972)	poles	200	95
Expulsion Fuse Replacement (WMP.459)	fuses	700	80
Detailed Vegetation Inspections (WMP.494)	inspections	485,400	255,000
Pole Clearing (WMP.512)	poles	33,010	22,000

c. SDG&E's General Rate Case

Regarding SDG&E's GRC Decision, it is important to understand that utilities' requests are based on forecasted ratemaking, and seeking a revenue requirement (comprising O&M and capital-related funding) to become effective on January 1 of the test year. SDG&E typically puts forth these requests in direct (*i.e.*, not including overhead costs), dollars by forecasting values in workpapers, which are groups of organizational-based O&M cost centers and capital budget codes. The forecasts are converted into a

test year revenue requirement.[11] After the submission and thorough review of the evidentiary record, the CPUC authorizes a revenue requirement to recover through rates the reasonable costs forecasted to be incurred in the test year, and a mechanism for adjusting the revenue requirement annually during the years between a utility's GRC test years, referred to as post-test years or attrition years.

SDG&E's test year was 2024, and rates approved in the 2024 GRC Decision were expected to become effective beginning on January 1, 2024. The 2024 GRC Decision was approved by the CPUC on December 19, 2024, at the end of the 2024 financial year. This delay in issuing a final GRC decision resulted in uncertainty in the test year regarding the funding that would be available to implement planned projects and programs.

With respect to wildfire mitigation, the CPUC's 2024 GRC Decision authorizes:

- Direct dollar forecasts and a revenue requirement for test year 2024
- For the system hardening mitigations of covered conductor and strategic undergrounding, direct dollar cost forecasts, unit forecasts, and a revenue requirement for each post-test year
- For all other wildfire mitigations except covered conductor and strategic undergrounding, escalation of the 2024 revenue requirement of about 3% for each post-test year

In addition to the authorizations above, the CPUC continued SDG&E's Wildfire Mitigation Plan Memorandum Account (WMPMA), converts the two-way Tree Trimming Balancing Account to a one-way Vegetation Management Balancing Account, and authorizes a memorandum account to record vegetation management costs exceeding authorized. The memorandum accounts require that any costs exceeding authorized amounts undergo after-the-fact reasonableness reviews prior to authorizing cost recovery.

For capital funding, SDG&E manages its GRC funding over the GRC cycle. This means that while capital spending levels may fluctuate on an annual basis, SDG&E attempts to complete the authorized capital work by the end of the GRC cycle (by the end of 2027). Accordingly, upon final approval of the 2024 GRC Decision, SDG&E has compared the final decision with the work performed in 2024, the costs incurred in 2024, and the results of its risk models. SDG&E may adjust the level of certain wildfire mitigation activities in the remainder of the GRC cycle to balance the work performed in 2024 with the remaining authorized work, funding, and risk through 2027. The CPUC has recognized that such adjustments, or the need to re-prioritize funding, may be needed during the GRC cycle. The CPUC has explicitly recognized that "new programs or projects may come up, others may be cancelled, and there may be reprioritization. This process is expected and is necessary for the utility to manage its operations in a safe and reliable manner."[12]

[11] SDG&E's GRCs direct dollar forecasts are converted into a test year revenue requirement using a ratemaking model, the Results of Operation (RO) model. The process by which the RO model converts the direct dollars into a test year revenue requirement includes the escalation of costs, intercompany billings between Southern California Gas Company and SDG&E, applying overheads (such as employee benefits) to capital projects, and converting the capital forecasts into capital-related costs (depreciation, taxes, and return).

[12] D.11-05-018 at 27.

II. Requested Changes to 2024 Initiatives

a. Distribution Communications Reliability Improvements (WMP.549); pg 175, SDG&E 2023-2025 Wildfire Mitigation Plan

SDG&E requests to reduce the target for this program from 60 base stations to 5 base stations. To find cost efficiencies without increasing wildfire risk and consider affordability measures given the pending General Rate Case, and to align with the pending Settlement Agreement, SDG&E elected to transition from a high-volume deployment of this program to a more targeted deployment, while continuing to assess the benefit of this program and where additional efficiencies could be achieved through refined practices and alternative technology. As further addressed below, in light of SDG&E's final 2024 GRC decision, SDG&E is also requesting changes to this program for 2025.

Most of the base stations planned required engineered steel foundation poles that have the telecommunication antennas at the top of the pole above distribution electric conductor connected below. In 2024, SDG&E standardized design and specifications for the poles including workspace, operational, and manufacturing requirements. The base stations were deployed with other grid hardening work, such as covered conductor, that require these poles and at strategic locations. This deployment plan created both design and cost efficiency. The modifications to this workplan results in a delay to some of the communications reliability improvements expected from the SDG&E-owned private LTE network that supports some of SDG&E's Advanced Protection Programs (APP), including Falling Conductor Protection (FCP) and Early Fault Detection (EFD). FCP and EFD work will continue to be deployed on this new network where available, but in the meantime will utilize alternate technologies for support. This program does not provide direct risk reduction and therefore will not change the SDG&E's risk profile.

b. Standby Power Program (Fixed Backup Power) (WMP.468); pg 181, SDG&E 2023-2025 Wildfire Mitigation Plan

SDG&E requests to reduce the target for this program from 300 generators to 45 generators. To find cost efficiencies without increasing wildfire risk and consider affordability measures given the pending General Rate Case, and to align with the pending Settlement Agreement, SDG&E elected to scale back on the scope of this program. Further, since as of mid-2024, SDG&E had experienced zero PSPS events since 2021, no new customers had been added to the scope of the program. SDG&E used the 2024 year to complete outstanding projects pending from prior years and focus on evaluating alternative offerings to address PSPS risk. The revised 2024 target represents completion of areas that have been previously invited to participate in the program, as well as a period of evaluation to determine how individual PSPS mitigation offerings fit into the program and larger vision of the WMP. SDG&E will continue to explore and evaluate additional PSPS mitigation approaches for its customers and expects this program to evolve in its next WMP cycle. SDG&E does not anticipate this change will impact expected PSPS risk reduction within the current 2023-2025 WMP cycle.

c. Drone Assessments (WMP.552); pg 202, SDG&E 2023-2025 Wildfire Mitigation Plan

SDG&E requests to reduce the 2024 target for this program from 13,500 inspections to 6,500 inspections. In 2023, SDG&E shifted to Risk-Informed Drone Inspections (RIDI), which evolved from its 2020-2022 Drone Investigation Assessment and Repair (DIAR) program. Because the DIAR program inspected all distribution structures in the HFTD, the RIDI program transitioned to a risk-informed strategy based on a selection of 15% of the highest risk structures in the HFTD for inspection

In 2024, as SDG&E awaited a final decision in its GRC and in alignment with the pending Settlement Agreement, SDG&E reevaluated the program to optimize the number of inspections based on further risk assessment. This reevaluation aimed to balance expected risk reduction with expected repair and replacement costs and timelines. The historical number and severity of findings from the first year of program implementation (2023), along with historical repair and replacement costs, were evaluated against the expected wildfire risk consequences at each asset location. This comprehensive analysis resulted in a determination to perform 6,500 inspections, which represented a balanced approach that still maximized risk reduction. The number of inspections may be adjusted based on the results of any given year to reduce wildfire risk. SDG&E will provide additional information on program updates in subsequent WMP filings.

d. Distribution Infrared Inspections (WMP.481); pg 195, SDG&E 2023-2025 Wildfire Mitigation Plan

SDG&E requests to reduce the target for this program from 9,532 inspections to 300 inspections. In 2024, in part based on affordability concerns and informed by the Settlement Agreement, SDG&E transitioned this program to a risk-informed approach in an effort to find efficiencies and optimize outcomes. In prior years, structures selected for this program were based on previously inspected structures to ensure no repeat inspections were performed in consecutive years and informed by subject matter expert (SME) recommendations. Upon review of program history, SDG&E found that this inspection program yielded only a 0.2% find rate. To optimize this program and make it more effective in 2024, the program targeted specific areas during peak load season and the structures were selected using a risk-informed strategy comprised of SDG&E's Asset 360 models, risk analytics models, and Intelligent Image Processing (IIP). This program will continue with the risk-informed approach in 2025, and inspections will be performed on 300 structures, as approved in SDG&E's 2025 WMP Update. Given the program find rate, SDG&E does not anticipate these changes will impact risk reduction.

e. Fuels Management (WMP.497); pg 276, SDG&E 2023-2025 Wildfire Mitigation Plan

SDG&E requests to reduce the target for this program from 500 poles to 150 poles. To find cost efficiencies without increasing wildfire risk and consider affordability measures given the pending General Rate Case, and to align with the pending Settlement Agreement, SDG&E elected to reduce the scope of this program in 2024. The election to reduce the scope of the initiative was informed by the

knowledge that the remaining poles in the fuels management initiative would be addressed by other risk-reducing vegetation management measures such as pole brushing. The reduced scope of the program is also supported by the reduction to SDG&E's vegetation management forecasts authorized by SDG&E's GRC Decision.[13] Requested Changes to 2025 Initiatives

SDG&E proposes necessary changes in strategic direction for its 2025 system hardening initiatives that will update the circuit miles and risk impacts for these programs. The driver of this change is the need to align SDG&E's WMP with the system hardening and undergrounding mileage targets, risk reduction targets, and associated cost recovery authorized amounts authorized in SDG&E's final GRC Decision.[14] The changes proposed herein are part of an ongoing effort to refine SDG&E's system hardening and undergrounding plan and optimize risk reduction to align with GRC authorized funding. Updated system hardening miles are based on SDG&E's current business planning estimates, and informed by prior work completed during this GRC cycle. SDG&E continues to explore options regarding ongoing implementation of its 2024 General Rate Case and will provide additional updates in its 2026-2028 WMP, as well as future WMP updates and reporting.

f. Strategic Undergrounding (WMP.473); pg 158, SDG&E 2023-2025 Wildfire Mitigation Plan

Given the level of funding and discussion provided in the final GRC decision, SDG&E must align this target by reducing the number of miles originally planned for Strategic Undergrounding from 125 miles to 28 miles in 2025. SDG&E undergrounded 112 miles in 2024, which results in 28 miles remaining to complete the amount of work authorized in its GRC decision. SDG&E continues to explore options regarding ongoing implementation of its 2024 General Rate Case and further opportunities for risk reduction, and will provide additional updates in its 2026-2028 WMP, as well as future WMP updates and reporting.

g. Covered Conductor (WMP.455); pg 156, SDG&E 2023-2025 Wildfire Mitigation Plan

SDG&E requests to increase the target for this program from 40 miles to 50 miles for 2025. Consistent with its GRC decision,[15] SDG&E is exploring options to increase ramp up of covered conductor deployment throughout the remainder of its rate case cycle. SDG&E intends to install covered conductor at a faster rate than initially anticipated. SDG&E's current covered conductor scope considers wildfire and PSPS risk at the circuit segment level and the effectiveness of both covered conductor and undergrounding as mitigation alternatives. The current scope for this program in its entirety is

[13] D.24-12-074 at 488-489.

[14] *See* D.24-12-074 at 479-483.

[15] *Id.* at 990, Finding of Fact 173.

comprised of just over 300 miles. Between 2020-2024, SDG&E installed approximately 168 miles and expects to install as much of the remaining scope by 2027 year-end beginning with 50 miles in 2025.

SDG&E further notes that its General Rate Case decision did not authorize cost recovery for covered conductor projects in alignment with SDG&E's program forecasts.[16] SDG&E is in the process of evaluation of its grid hardening strategy, including covered conductor deployment, as it continues to enhance its risk models, develop its methodology for cost/benefit analysis, and understand the effectiveness of its mitigations for both wildfire and PSPS in the context of an evolving climate. In addition, expansion of existing covered conductor scope may be delayed due to the time it takes to expand scoped mileage, including additional work to obtain permits, acquire easements, design, and construction of the work.

h. Lightning Arrester Removal/Replacement (WMP.550), Avian Protection (WMP.972), Expulsion Fuse Replacements (WMP.459), Connectors including Hotline Clamps (WMP.464); pg 222, SDG&E 2023-2025 Wildfire Mitigation Plan

To further align WMP programs with SDG&E's GRC, SDG&E requests to reduce the targets for the aforementioned asset replacement programs to 90 lightning arrestors, 100 hotline clamps, 95 poles with avian protection, and 80 fuses in 2025. The changes are summarized in the table below:

Program	**Units**	**Original Target**	**Requested Target**
Lightning Arrester Removal/Replacement (WMP.550)	lightning arresters	1,848	90
Connectors, including hotline clamps (WMP.464)	hotline clamps	950	100
Avian Protection (WMP.972)	poles	200	95
Expulsion Fuse Replacement (WMP.459)	fuses	700	80

Upon receiving its final GRC decision and aligning its grid hardening strategy accordingly, SDG&E evaluated the remaining WMP portfolio of initiatives to identify where it could realize cost alignment with authorized funding to achieve the optimal risk reduction given the overall reduction to SDG&E's WMP-related GRC request. Going forward, rather than proactive, high-volume deployment of these assets, SDG&E will instead strategically deploy these assets with the deployment of covered conductor and continue to replace them as needed as part of its Corrective Maintenance Program (CMP). This

[16] *Id.* at 990, Finding of Fact 174.

deployment plan will achieve cost efficiencies and prioritize higher risk circuit segments in tandem with covered conductor. [17]

i. Transmission OH Hardening (WMP.543); pg 164, SDG&E 2023-2025 Wildfire Mitigation Plan

SDG&E requests to reduce the target for this program from 4.64 miles to 2 miles. The reduction in target is due to a dependency on distribution underbuild that was previously scoped for strategic undergrounding but will no longer be performed in 2025 due to the undergrounding program reductions described above. Therefore, the transmission hardening work requires either a re-design to account for the distribution underbuilt or will be shifted to future years when the distribution underbuild is undergrounded.

j. Distribution Communications Reliability Improvements (WMP.549); pg 175, SDG&E 2023-2025 Wildfire Mitigation Plan

To further align WMP programs with funding totals authorized by SDG&E's GRC, SDG&E requests to reduce the 2025 target from 42 to 5 base stations in an effort to realize cost efficiencies aligned with its GRC decision. This program has no direct impact to risk reduction, and therefore will not change the SDG&E's risk profile. Additional information on this program is provided in the section addressing 2024 changes to this program.

k. Microgrids (WMP.462); pg 167, SDG&E 2023-2025 Wildfire Mitigation Plan

While SDG&E is not requesting a target change in 2025 for this program, it notes that the renewable generation and battery storage components of its 4 microgrids will be funded through alternative budgets and not through SDG&E's Wildfire Mitigation Plan funding, to align with SDG&E's General Rate Case. The microgrids are operational and capable of serving customers during a Public Safety Power Shutoff (PSPS) and achieve the intent of reducing PSPS impacts on customers, thus, there is no change to risk reduction.

l. Drone Assessments (WMP.552); pg 202, SDG&E 2023-2025 Wildfire Mitigation Plan

As further described above with respect to the 2024 changes to this program, SDG&E requests to reduce the 2025 target from 13,500 inspections to 6,500 inspections in an effort to realize cost efficiencies aligned with its GRC decision.

[17] Given the limited period of time between issuance of SDG&E's final GRC Decision and submission of this change order, SDG&E has not been able to perform a comprehensive assessment of new targets for these initiatives. There are several variations in covered conductor deployment that must be accounted for in forming targets; SDG&E has made its best effort to estimate targets based on an average number of poles per circuit mile.

m. Detailed Vegetation Inspections (WMP.494); pg 268, SDG&E 2023-2025 Wildfire Mitigation Plan

SDG&E requests to reduce the target for this program from 485,400 inspections to 255,000 inspections, to reflect inspections performed in the High Fire Threat District (HFTD) of its territory, consistent with the approach taken in SDG&E's GRC Decision.[18] Further, as SDG&E's WMP reporting is otherwise largely dedicated to work performed in the HFTD, this revision brings the target in line with other WMP programs and initiatives. The proposed change does not result in any reductions to SDG&E's vegetation management program.

n. Pole Clearing (WMP.512); pg 278, SDG&E 2023-2025 Wildfire Mitigation Plan

To further align WMP initiatives with approved GRC funding, SDG&E requests to reduce the target for this program from 33,010 poles to 22,000 poles. Beginning in 2025, SDG&E will no longer include poles that are exempt from Public Resources Code (PRC) § 4292 in this program, as these poles include hardware on Cal Fire's list of equipment exempt from pole clearing requirements in PRC 4292. Based on this approach, discontinuing these discretionary pole clearing efforts should not result in a significant increase in wildfire risk.

[18] *Id.* at 991, Finding of Fact 179.

III. Risk Reduction Impact

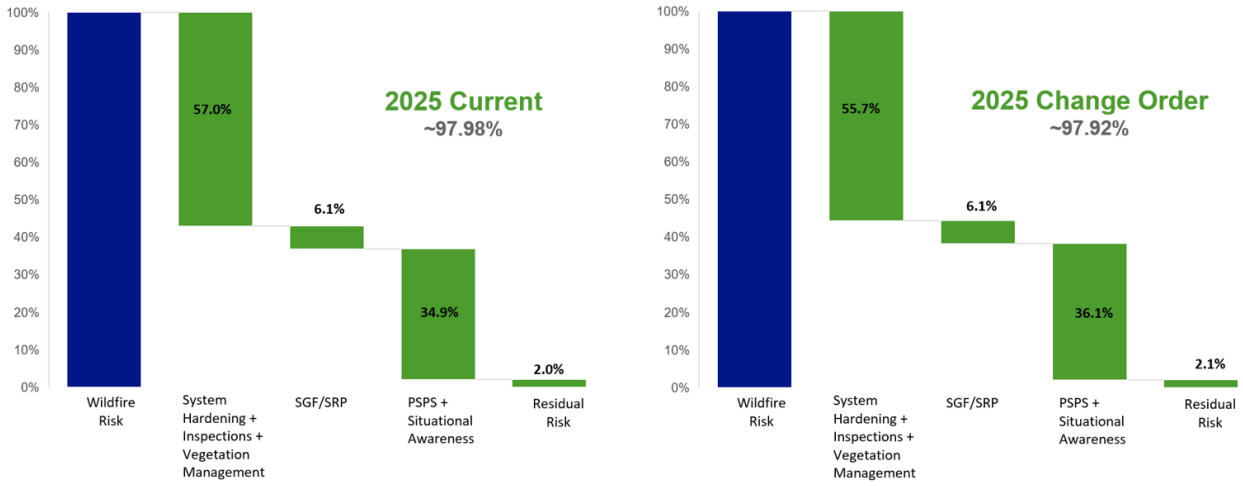
Figure 1 below shows SDG&E's risk reduction achieved through implementation of its 2023-2025 WMP portfolio of mitigations prior to (left) and after (right) the changes requested in this Change Order. The impact of the changes requested on risk reduction achieved appears to be negligible due to large scale grid hardening changes – namely strategic undergrounding - only impacting one year of the 3-year cycle (2025).

Figure 1 below illustrates the expected risk reduction achieved by SDG&E through the implementation of its 2023-2025 Wildfire Mitigation Plan (WMP) portfolio of hardening mitigations, both before (left) and after (right) the update in miles requested in this Change Order.

The requested changes have a minimal impact on the overall risk reduction achieved by the end of the three-year cycle, primarily due to the relatively small update to the covered conductor miles target for 2025. However, an increase in Public Safety Power Shutoff (PSPS) risk is anticipated, as deploying Covered Conductors without operational mitigations like PSPS or PEDS does not fully eliminate the need to de-energize feeder segments during extreme fire weather conditions, such as those recently experienced in Southern California.

SDG&E remains confident that it will achieve its long-term wildfire risk reduction goals - which includes minimal utilization of PSPS over time – through ongoing deployment of grid hardening initiatives. Further discussion of these programs will be addressed in SDG&E's 2026-2028 WMP.

Figure 1



Attachment A

Attachment A- Revised Initiative Targets and Projected Capital and O&M Expenditures

				Projected 2025 WMP Update					Projected 2025 Revised				
				CAPEX ($000)		OPEX ($000)		Target	CAPEX ($000)		OPEX ($000)		Target
WMP Initiative Category	WMP Initiative Activity	Tracking ID	Initiative Name	Territory	HFTD	Territory	HFTD		Territory	HFTD	Territory	HFTD	
Community Outreach and Engagement	Public outreach and education awareness program	WMP.527		$ -	$ -	$4,004	$4,004	NA	$ -	$ -	$180	$180	NA
Community Outreach and Engagement	Engagement with access and functional needs populations	WMP.532		$ -	$ -	$ -	$ -	NA	$ -	$ -	$1,775	$1,775	NA
Emergency Preparedness	Public emergency communication strategy	WMP.1198		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Community Outreach and Engagement	Collaboration on local wildfire mitigation planning	WMP.1199		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Community Outreach and Engagement	Best practice sharing with other utilities	WMP.1200		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Community Outreach and Engagement	Collaboration on local wildfire mitigation planning	WMP.1337	Community Engagement	$ -	$ -	$641	$641	NA	$ -	$ -	$671	$671	NA
Emergency Preparedness	Other	WMP.514	Crew-accompanying ignition prevention and suppression resources and services	$ -	$ -	$3,836	$3,836	NA	$ -	$ -	$4,500	$4,500	NA
Grid Design, Operations, and Maintenance	Personnel Work Procedures and Training in Elevated Fire Risk (Grid Ops)	WMP.557	Aviation Firefighting Program	$689	$689	$8,366	$8,366	NA	$3,109	$689	$5,171	$5,171	NA

				Projected 2025 WMP Update					Projected 2025 Revised				
				CAPEX ($000)		OPEX ($000)		Target	CAPEX ($000)		OPEX ($000)		Target
WMP Initiative Category	WMP Initiative Activity	Tracking ID	Initiative Name	Territory	HFTD	Territory	HFTD		Territory	HFTD	Territory	HFTD	
Emergency Preparedness	Public emergency communication strategy	WMP.563		$7,757	$7,757	$5,219	$5,219	NA	$9,154	$7,757	$8,072	$8,072	NA
Emergency Preparedness	Customer support in wildfire and PSPS emergencies	WMP.1007		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Emergency Preparedness	Emergency preparedness plan	WMP.1008		$315	$315	$16,148	$16,148	NA	$410	$315	$18,148	$18,148	NA
Emergency Preparedness	Preparedness and planning for service restoration	WMP.1009		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Emergency Preparedness	External collaboration and coordination	WMP.1201		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Grid Design, Operations, and Maintenance	Grid Response Procedures and Notifications (Grid Ops)	WMP.449	Wireless Fault Indicators	$ -	$ -	$ -	$ -	-	$ -	$ -	$ -	$ -	-
Grid Design, Operations, and Maintenance	Other grid topology improvements to minimize risk of ignitions	WMP.453	Capacitor Maintenance and replacement program (SCADA)	$ -	$ -	$ -	$ -	-	$ -	$ -	$ -	$ -	-
Grid Design, Operations, and Maintenance	Covered conductor installation	WMP.455	Covered Conductor	$67,632	$67,632	$3,090	$3,090	40	$81,431	$81,431	$3,214	$3,214	50
Grid Design, Operations, and Maintenance	Equipment inspections, maintenance, and repair	WMP.459	Expulsion fuse replacement	$1,550	$1,550	$ -	$ -	700	$ -	$ -	$ -	$ -	80

				Projected 2025 WMP Update					Projected 2025 Revised				
				CAPEX ($000)		OPEX ($000)		Target	CAPEX ($000)		OPEX ($000)		Target
WMP Initiative Category	WMP Initiative Activity	Tracking ID	Initiative Name	Territory	HFTD	Territory	HFTD		Territory	HFTD	Territory	HFTD	
Grid Design, Operations, and Maintenance	Equipment inspections, maintenance, and repair	WMP.464	Maintenance, repair, and replacement of connectors, including hotline clamps	$1,702	$1,451	$52	$44	950	$ -	$ -	$ -	$ -	100
Grid Design, Operations, and Maintenance	Equipment inspections, maintenance, and repair	WMP.550	Lightning arrester removal and replacement	$3,483	$3,483	$ -	$ -	1,848	$ -	$ -	$ -	$ -	90
Grid Design, Operations, and Maintenance	Other grid topology improvements to minimize risk of ignitions	WMP.972	Avian Protection	$1,512	$1,210	$10	$8	200	$ -	$ -	$ -	$ -	95
Grid Design, Operations, and Maintenance	Other grid topology improvements to minimize risk of ignitions	WMP.1189	Strategic Pole Replacement Program	$6,948	$6,948	$4	$4	291	$7,923	$7,923	$305	$305	291
Grid Design, Operations, and Maintenance	Other technologies and systems not listed above	WMP.461	PSPS Sectionalizing Enhancements	$1,881	$1,881	$ -	$ -	10	$1,485	$1,485	$ -	$ -	10
Grid Design, Operations, and Maintenance	Microgrids	WMP.462	Microgrids	$14,127	$ -	$1,445	$ -	-	$ -	$ -	$1,236	$ -	-
Grid Design, Operations, and Maintenance	Other technologies and systems not listed above	WMP.466	Generator Grant Program	$ -	$ -	$3,233	$3,233	NA	$ -	$ -	$3,981	$3,981	NA
Grid Design, Operations, and Maintenance	Other technologies and systems not listed above	WMP.467	Generator Assistance Program	$ -	$ -	$501	$501	NA	$ -	$ -	$494	$494	NA

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WMP Initiative Category	WMP Initiative Activity	Tracking ID	Initiative Name	Territory	HFTD	Territory	HFTD		Territory	HFTD	Territory	HFTD	
Grid Design, Operations, and Maintenance	Other technologies and systems not listed above	WMP.468	Standby Power Programs	$ -	$ -	$5,539	$5,539	89	$ -	$ -	$3,081	$3,081	89
Grid Design, Operations, and Maintenance	Traditional overhead hardening	WMP.1016	CNF (Distribution Underground)	$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Grid Design, Operations, and Maintenance	Traditional overhead hardening	WMP.1017	CNF (Distribution Overhead)	$648	$648	$155	$155	NA	$648	$648	$216	$216	NA
Grid Design, Operations, and Maintenance	Distribution pole replacements and reinforcements	WMP.458		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Grid Design, Operations, and Maintenance	Transmission pole/tower replacements and reinforcements	WMP.472		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Grid Design, Operations, and Maintenance	Undergrounding of electric lines and/or equipment	WMP.473	Strategic Undergrounding	$358,877	$358,877	$1,709	$1,709	125	$77,136	$77,136	$1,332	$1,332	28
Grid Design, Operations, and Maintenance	Traditional overhead hardening	WMP.475	Distribution OH System Hardening	$1,078	$1,078	$963	$963	-	$4,065	$4,065	$3,181	$3,181	-
Grid Design, Operations, and Maintenance	Traditional overhead hardening	WMP.543	Transmission OH Hardening	$ -	$ -	$ -	$ -	4.64	$ -	$ -	$ -	$ -	2
Grid Design, Operations,	Traditional overhead hardening	WMP.545	Transmission OH Hardening -	$14,694	$14,694	$4	$4	1.8	$14,362	$14,362	$24	$24	1.8

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WMP Initiative Category	WMP Initiative Activity	Tracking ID	Initiative Name	Territory	HFTD	Territory	HFTD		Territory	HFTD	Territory	HFTD	
and Maintenance			Distribution Underbuild										
Grid Design, Operations, and Maintenance	Installation of system automation equipment	WMP.463	Advanced Protection	$3,383	$3,383	$207	$207	8	$10,667	$10,667	$145	$145	8
Grid Design, Operations, and Maintenance	Installation of system automation equipment	WMP.1195	Early Fault Detection	$3,410	$3,410	$4	$4	60	$3,410	$3,410	$144	$144	60
Grid Design, Operations, and Maintenance	Installation of system automation equipment	WMP.549	Distribution Communications Reliability Improvements	$43,213	$42,184	$999	$975	42	$8,700	$8,700	$2,329	$2,329	5
Grid Design, Operations, and Maintenance	Line removals (in HFTD)	WMP.1202		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Grid Design, Operations, and Maintenance	Asset inspections	WMP.478	Distribution overhead detailed inspections	$9,563	$9,563	$824	$824	13,275	$9,563	$9,563	$540	$540	13,275
Grid Design, Operations, and Maintenance	Asset inspections	WMP.479	Transmission overhead detailed inspections	$1,943	$1,943	$38	$38	2,479	$1,943	$1,943	$24	$24	2,479
Grid Design, Operations, and Maintenance	Asset inspections	WMP.481	Distribution infrared inspections	$ -	$ -	$10	$ -	300	$ -	$ -	$8	$8	300
Grid Design, Operations, and Maintenance	Asset inspections	WMP.482	Transmission infrared inspections	$ -	$ -	$ -	$ -	7,331	$ -	$ -	$ -	$ -	7,331

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WMP Initiative Category	WMP Initiative Activity	Tracking ID	Initiative Name	Territory	HFTD	Territory	HFTD		Territory	HFTD	Territory	HFTD	
Grid Design, Operations, and Maintenance	Asset inspections	WMP.483	Distribution wood pole intrusive inspections	$1,462	$1,462	$104	$104	344	$1,462	$1,462	$79	$79	344
Grid Design, Operations, and Maintenance	Asset inspections	WMP.484		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Grid Design, Operations, and Maintenance	Asset inspections	WMP.488	Distribution overhead patrol inspections	$875	$875	$313	$313	86,535	$875	$875	$420	$420	86,535
Grid Design, Operations, and Maintenance	Asset inspections	WMP.489	Transmission overhead patrol inspections	$ -	$ -	$ -	$ -	7,533	$ -	$ -	$ -	$ -	7,533
Grid Design, Operations, and Maintenance	Asset inspections	WMP.492	Substation patrol inspections	$ -	$ -	$ -	$ -	384	$ -	$ -	$ -	$ -	384
Grid Design, Operations, and Maintenance	Asset inspections	WMP.551		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Grid Design, Operations, and Maintenance	Asset inspections	WMP.552	Drone assessments	$54,937	$53,289	$31,490	$30,545	13,500	$42,936	$42,936	$14,750	$14,750	6,500
Grid Design, Operations, and Maintenance	Asset inspections	WMP.555	Transmission 69kV tier 3 visual inspections	$ -	$ -	$ -	$ -	1,632	$ -	$ -	$ -	$ -	1,632
Grid Design, Operations, and Maintenance	Asset inspections	WMP.1190	Transmission wood pole intrusive inspections	$ -	$ -	$ -	$ -	114	$ -	$ -	$ -	$ -	114

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WMP Initiative Category	WMP Initiative Activity	Tracking ID	Initiative Name	Territory	HFTD	Territory	HFTD		Territory	HFTD	Territory	HFTD	
Grid Design, Operations, and Maintenance	Quality assurance / quality control	WMP.491	QA/QC of Distribution Detailed Inspections	$ -	$ -	$ -	$ -	50%	$ -	$ -	$ -	$ -	50%
Grid Design, Operations, and Maintenance	Quality assurance / quality control	WMP.1191	QA/QC of Transmission Inspections	$ -	$ -	$ -	$ -	100%	$ -	$ -	$ -	$ -	100%
Grid Design, Operations, and Maintenance	Quality assurance / quality control	WMP.1192	QA/QC of Distribution Drone Assessments	$ -	$ -	$ -	$ -	100%	$ -	$ -	$ -	$ -	100%
Grid Design, Operations, and Maintenance	Quality assurance / quality control	WMP.1193	QA/QC of Wood Pole Intrusive (Transmission & Distribution)	$ -	$ -	$ -	$ -	10%	$ -	$ -	$ -	$ -	10%
Grid Design, Operations, and Maintenance	Quality assurance / quality control	WMP.1194	QA/QC of Substation Inspections	$ -	$ -	$ -	$ -	18	$ -	$ -	$ -	$ -	18
Grid Design, Operations, and Maintenance	Open work orders	WMP.1203		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Grid Design, Operations, and Maintenance	Equipment Settings to Reduce Wildfire Risk (Grid Ops)	WMP.1204		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Grid Design, Operations, and Maintenance	Grid Response Procedures and Notifications (Grid Ops)	WMP.1205		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Grid Design, Operations, and Maintenance	Workforce Planning	WMP.1206		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA

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WMP Initiative Category	WMP Initiative Activity	Tracking ID	Initiative Name	Territory	HFTD	Territory	HFTD		Territory	HFTD	Territory	HFTD	
Grid Design, Operations, and Maintenance	Personnel Work Procedures and Training in Conditions of Elevated Fire Risk (Grid Ops)	WMP.515		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Overview of the Service Territory	Environmental compliance and permitting	WMP.493		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Situational Awareness and Forecasting	Environmental monitoring systems	WMP.447		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Situational Awareness and Forecasting	Environmental monitoring systems	WMP.970		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Situational Awareness and Forecasting	Environmental monitoring systems	WMP.1431	Air Quality Station Maintenance	$ -	$ -	$74	$74	16	$ -	$ -	$84	$84	16
Situational Awareness and Forecasting	Environmental monitoring systems	WMP.1430	Weather Station Maintenance and Calibration	$140	$140	$ -	$ -	216	$261	$261	$ -	$ -	216
Situational Awareness and Forecasting	Weather forecasting	WMP.443		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Situational Awareness and Forecasting	Fire potential index	WMP.450		$1,477	$1,477	$4,366	$4,366	NA	$1,538	$1,538	$3,000	$3,000	NA
Grid Design, Operations,	Other technologies and	WMP.558		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA

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WMP Initiative Category	WMP Initiative Activity	Tracking ID	Initiative Name	Territory	HFTD	Territory	HFTD		Territory	HFTD	Territory	HFTD	
and Maintenance	systems not listed above												
Vegetation Management and Inspection	Vegetation Inspections	WMP.494		$ -	$ -	$61,887	$32,639	485,400	$ -	$ -	$58,503	$30,696	255,000
Vegetation Management and Inspection	Emergency response vegetation management	WMP.496		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Vegetation Management and Inspection	Wood and slash management	WMP.497	Fuels Management	$ -	$ -	$6,008	$6,008	500	$ -	$ -	$6,150	$6,150	500
Vegetation Management and Inspection	Clearance	WMP.501		$ -	$ -	$10,542	$10,542	11,200	$ -	$ -	$10,542	$10,542	11,200
Vegetation Management and Inspection	Quality assurance / quality control	WMP.505		$ -	$ -	$ -	$ -	15%	$ -	$ -	$ -	$ -	15%
Vegetation Management and Inspection	Vegetation management enterprise system	WMP.511		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Vegetation Management and Inspection	Pole clearing	WMP.512		$ -	$ -	$8,130	$7,145	33,010	$ -	$ -	$6,427	$5,648	22,000
Grid Design, Operations, and Maintenance	Open work orders	WMP.1207		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Grid Design, Operations, and Maintenance	Workforce Planning	WMP.1208		$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA

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WMP Initiative Category	**WMP Initiative Activity**	**Tracking ID**	**Initiative Name**	**Territory**	**HFTD**	**Territory**	**HFTD**		**Territory**	**HFTD**	**Territory**	**HFTD**	
Vegetation Management and Inspection	High-risk species	WMP.1325	Right Tree Right Place	$ -	$ -	$1,030	$1,030	NA	$ -	$ -	$ -	$ -	NA
Vegetation Management and Inspection	High-risk species	WMP.1326	Community Tree Rebate Program	$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Grid Design, Operations, and Maintenance	Asset management and inspection enterprise system(s)	WMP.519	Centralized repository for data	$15,331	$15,331	$1,688	$1,688	NA	$15,642	$15,642	$1,600	$1,600	NA
Risk Methodology and Assessment	Risk Methodology and Assessment	WMP.442	A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment (WiNGS)	$ -	$ -	$3,436	$3,436	NA	$ -	$ -	$5,152	$5,152	NA
Wildfire Mitigation Strategy Development	Other	WMP.521	Documentation and disclosure of wildfire-related data and algorithms	$ -	$ -	$ -	$ -	NA	$ -	$ -	$ -	$ -	NA
Wildfire Mitigation Strategy Development	Other	WMP.523	Allocation methodology development and application	$1,106	$1,106	$5,524	$5,524	NA	$1,201	$1,106	$4,110	$4,110	NA
TOTAL				**$619,734**	**$602,376**	**$191,590**	**$158,924**		**$297,920**	**$293,913**	**$169,588**	**$139,766**	
TOTAL OPEX + CAPEX			**$ 811,323**										