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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, Southern California Edison and Pacific Gas & Electric Company's Comments on Draft 2026-2028 WMP Guidelines Package 2

Dear Acting Deputy Director Marino:

San Diego Gas & Electric ("SDG&E"), Pacific Gas & Electric, (PG&E), and Southern California Edison (SCE) ("Joint Utilities") hereby provide comments addressing the Draft 2026-2028 Wildfire Mitigation Plan ("WMP") Guidelines Package 2 ("Draft Guidelines") issued by the Office of Energy Infrastructure Safety ("Energy Safety") on February 10, 2025. The Joint Utilities generally support the approach of the Draft Guidelines; however, there are certain areas that would benefit from additional clarity and others that require revision to ensure that the 2026-2028 Maturity Model and Survey continue to efficiently and effectively promote the ongoing reduction of utility-related wildfire risk.

I. COMMENTS ON THE MATURITY MODEL AND SURVEY GUIDELINES

A. CLARIFICATION REGARDING MINIMUM REQUIREMENTS

In several cases, maturity levels reference "minimum Energy Safety requirements" or some variation thereof (e.g., minimum reporting requirements of Energy Safety, minimum expectations, etc.). However, there is no clear reference to what those specific requirements entail.¹ Listed below are the capabilities and sub-

¹ Draft WMP Guidelines Package 2 Maturity Model and Survey Guidelines, p. 46-100.

capabilities which reference Energy Safety minimum requirements in the maturity level descriptions:

1. Statistical weather, climate, and wildfire modeling
 - Comprehensiveness
 - IT infrastructure and database management
 - Stability of assumptions
 - Transparency
 - Validation
2. Calculation of wildfire and PSPS hazard and exposure to societal values
 - IT infrastructure and database management
 - Stability of assumptions
 - Transparency
 - Validation
3. Calculation of community vulnerability to wildfire and PSPS
 - IT infrastructure and database management
 - Stability of assumptions
 - Transparency
 - Validation
4. Calculation of risk and risk components
 - Comprehensiveness
 - IT infrastructure and database management
 - Stability of assumptions
 - Transparency
 - Validation
5. Risk event tracking and integration of lessons learned
 - Documentation and disclosures
 - IT infrastructure and database management
6. Risk-informed wildfire mitigation strategy
 - IT infrastructure and database management
 - Stability of assumptions
 - Validation
7. Ignition likelihood estimation
 - IT infrastructure and database management
 - Stability of assumptions
 - Transparency
 - Validation
8. Weather forecasting ability
 - Comprehensive
 - IT infrastructure and database management
 - Stability of assumptions

- Transparency
 - Validation
 - Validation & documentation and disclosures
9. Wildfire spread forecasting
- Automation & frequency
 - Comprehensiveness
 - IT infrastructure and database management
 - Transparency
 - Validation
 - Validation & documentation and disclosures
10. Data collection for near-real-time conditions
- Transparency
 - Validation & documentation and disclosures

The Joint Utilities request clarification as to these minimum requirements to ensure alignment with the expected standards.

B. ISSUES WITH SPECIFIC MATURITY LEVELS IN THE MATURITY SURVEY

The Joint Utilities identify specific sub-capability maturity level descriptions that are unclear or which the Joint Utilities believe do not represent meaningful maturity. Specific examples include:

- Statistical weather, climate, and wildfire modeling: Modularization, Maturity Level four²,
 - Meaningful maturity – Recommend removing “Large eddy scale weather” in order to achieve a maturity level four. There are no plans to run a large eddy scale weather module at this time because it is extremely expensive to run across large service territories.
- Centralized monitoring of real-time conditions: Transparency, Maturity Levels two and above³,
 - Meaningful maturity – Recommend removing “Electrical corporation shares facility guidelines with the public and accepts recommendations for revisions” in order to achieve maturity level two and above. It is not appropriate to seek a public recommendation for the location of critical monitoring assets.
- PSPS operating model: Level of sophistication⁴ and Validation⁵

² Draft_WMP_Guidelines__Package_2_Maturity_Model_and_Survey_Guidelines, p. 48.

³ Draft_WMP_Guidelines__Package_2_Maturity_Model_and_Survey_Guidelines, p. 105.

⁴ Draft_WMP_Guidelines__Package_2_Maturity_Model_and_Survey_Guidelines, p. 144.

⁵ Draft_WMP_Guidelines__Package_2_Maturity_Model_and_Survey_Guidelines, p. 145.

- Unclear – Recommend clarifying how to calculate the average PSPS per customer per year. We cannot measure maturity of PSPS by the amount of time that customers experience PSPS because that is driven by the weather conditions and not by the utility.
- Ignition prevention and suppression: Standardized processes, Maturity Levels three and four⁶
 - Meaningful maturity – Recommend removing “The electrical corporation has fire suppression and safety teams onsite during asset and vegetation management work in HFTD areas” and replacing it with, “The electrical corporation has developed and implemented fire prevention requirements for performing asset and vegetation management work in HFTD areas. These requirements should address wildfire risk and incorporate mitigations based on actual fire weather conditions at the time work is being performed,” in order to achieve maturity level three and four.
- Customer support in wildfire and PSPS emergencies: Comprehensiveness, Maturity Level one and above⁷.
 - Recommend to frame as support provided to customers directly impacted by a wildfire.

We bring this to Energy Safety’s attention as ambiguity and unclear descriptions will make it more difficult to compare scores across utilities. Similarly, detailed maturity level descriptions that do not represent meaningful gains in maturity will cause the Electrical Corporation maturity level scores to be less accurate. The Joint Utilities urge Energy Safety to revise these descriptions to improve the quality of the responses to the maturity survey.

II. CONCLUSION

The Joint Utilities appreciate the opportunity to provide these comments and look forward to continuing to work with Energy Safety on advancing wildfire mitigation maturity.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company

⁶ Draft_WMP_Guidelines__Package_2_Maturity_Model_and_Survey_Guidelines, p. 149.

⁷ Draft_WMP_Guidelines__Package_2_Maturity_Model_and_Survey_Guidelines, p. 163.