



Laura M. Fulton  
Senior Counsel  
8330 Century Park Court, CP32F  
San Diego, CA 92123-1548

LFulton@SDGE.com

April 1, 2025

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

**RE: SDG&E's Spatial and Non-Spatial Data Submission Revision of 2024 Filings and Quarterly Notification Attachment A of Q4 2024 Filing**

**Docket #2024-SC and #2024-QDR**

Dear Mr. Mohammed:

San Diego Gas & Electric Company (SDG&E or the Company) is notifying you of the resubmission of the SDG&E's Q1 2024 – Q4 2024 Quarterly Data Report (QDR). Pursuant to the Office of Energy Infrastructure Safety's (Energy Safety) Data Guidelines, when an electrical corporation becomes aware of a need for revisions to previously submitted data, the electrical corporation provide the revisions by the next quarterly submission date.<sup>1</sup>

SDG&E's is also providing revisions to Attachment A of its Q4 2024 Quarterly Notification Letter (QNL), which includes detailed updates on SDG&E's WMP initiative progress consistent with the revisions made to SDG&E's QDRs. This is included as Attachment A.

**I. Revisions to QDR GIS Data:**

Revisions are respective to Grid Hardening Point and Grid Hardening Line in Table 1 for the following activities. See SDGE\_2024\_Q4\_GIS\_RevisionLog\_Rev1, for specific activity updates.

Covered conductor installation, WMP.455, Section 8.1.2.1.

- Q2 and Q3 revisions are due to lingering data between systems.
  - Q2 updated: 12.6 miles to 14.03 miles
  - Q3 updated: 17.09 miles to 18.52 miles

Undergrounding of electric lines and/or equipment, WMP.473, Section 8.1.2.2.

---

<sup>1</sup> See Energy Safety Data Guidelines Version 3.2 (Jan. 30, 2024) page 7 ("Revisions to Previously Submitted Data") and Energy Safety Data Guidelines Version 4.01 (Mar. 21, 2025) page 8 ("Revisions to Previously Submitted Data").

- Q1 through Q4 revisions are due to the CAD measurement used by GIS and the cable pull footage that contractors use in the as-builts and the inclusion of secondary line miles.
  - Q1 updated: 3.22 miles to 4.69 miles
  - Q2 updated: 3.22 miles to 4.69 miles
  - Q3 updated: 18.46 miles to 18.52 miles
  - Q4 updated: 81 miles to 112 miles

Early fault detection, WMP.1195, Section 8.1.2.8.2.

- Q1 through Q4 revisions are due to reporting projects not in alignment with WMP.
  - Q1 updated: 17 nodes to 8 nodes
  - Q2 updated: 20 nodes to 11 nodes
  - Q3 updated: 28 nodes to 39 nodes
  - Q4 updated: 58 nodes to 62 nodes

Expulsion fuse replacement, WMP.459, Section 8.1.4.4.

- Q1 through Q3 revisions are due to lagging completions and erroneously reported completions.
  - Q1 updated: 0 fuses to 1 fuse
  - Q2 updated: 30 fuses to 23 fuses
  - Q3 updated: 39 fuses to 37 fuses

Maintenance, repair, and replacement of connectors, including hotline clamps, WMP.464, Section 8.1.4.5.

- Q1 through Q3 revisions are due to lagging completions and erroneously reported completions.
  - Q1 updated: 130 hotline clamps to 127 hotline clamps
  - Q2 updated: 430 hotline clamps to 436 hotline clamps
  - Q3 updated: 578 hotline clamps to 486 hotline clamps

Lightning arrester removal and replacement, WMP.550, Section 8.1.4.6.

- Q1 through Q3 revisions are due to lagging completions and erroneously reported completions.
  - Q1 updated: 111 arrestors to 121 arrestors
  - Q2 updated: 651 arrestors to 742 arrestors
  - Q3 updated: 1,295 arrestors to 1,311 arrestors

Avian protection, WMP.972, Section 8.1.2.10.1.

- Q1 and Q2 revisions are due to lagging completions and erroneously reported completions.
  - Q1 updated: 64 poles to 71 poles
  - Q2 updated: 301 poles to 373 poles

Strategic pole replacement program, WMP.1189, Section 8.1.2.10.2.

- Q1 revisions due to duplicate reporting.
  - Q1 updated: 16 poles to 11 poles

PSPS sectionalizing enhancements, WMP.461, Section 8.1.2.11.1.

- Q2 and Q3 revisions are due to lagging completions.
  - Q2 updated: 10 switches to 4 switches
  - Q3 updated: 10 switches to 12 switches

Vegetation Management Off-Cycle Patrol, WMP.508, Section 8.2.2.2

- Q4 revision due to inadvertent manual data entry error.
  - Q2 updated: 53 VMAs to 54 VMAs
  - Q4 updated: 105 VMAs to 106 VMAs

**II. Revisions to ODR Tabular Wildfire Mitigation Data**

Revisions to tabular data in Metric Tables are annotated in red and found within the following,

- SDGE\_2024\_Q1\_Tables1-15\_R2
- SDGE\_2024\_Q2\_Tables1-15\_R1
- SDGE\_2024\_Q3\_Tables1-15\_R1
- SDGE\_2024\_Q4\_Tables1-15\_R1

TABLE 1	Q1	Q2	Q3	Q4
Covered Conductor (WMP.455)	NA	Z2	AA2	NA
Undergrounding (WMP.473)	Y3	Z3	AA3	AB3
Early Fault Detection (WMP.1195)	Y8	Z8	AA8	AB8
Expulsion Fuse Replacement (WMP.459)	Y11	Z11	AA11	NA
Hotline Clamps (WMP.464)	Y12	Z12	AA12	NA
Lightening Arrester (WMP.550)	Y13	Z13	AA13	NA
Avian Protection (WMP.972)	Y14	Z14	NA	NA
Strategic Pole Replacements (WMP.1189)	Y16	NA	NA	NA
PSPS Sectionalizing Enhancements (WMP.461)	NA	Z17	AA17	NA
Off-Cycle Patrol (WMP.508)	NA	Z40	NA	AB40

TABLE 9	Q1	Q2	Q3
Number of overhead circuit miles planned for upgrade (1.d.2.a1ii)	I17	NA	NA
Number of overhead circuit miles planned for upgrade (1.d.3.b.i)	NA	I24	NA
Number of overhead circuit miles planned for upgrade (1.d.3.b.ii)	NA	I25	NA
Number of overhead circuit miles planned for upgrade (1.t.2.b.i)	NA	NA	I36

<b>TABLE 11</b>	<b>CAPEX (Territory)</b>	<b>CAPEX (HFTD)</b>	<b>OPEX (Territory)</b>	<b>OPEX (HFTD)</b>
Microgrids (WMP.462)	N32	O32	NA	NA
Distribution Overhead Detailed Inspections (WMP.478)	N48	O48	NA	NA
Distribution Wood Pole Intrusive Inspections (WMP.483)	N52	O52	NA	NA
Distribution Overhead Patrol Inspections (WMP.488)	N54	O54	NA	NA
Fire Potential Index (WMP.450)	N77	O77	P77	Q77
Allocation methodology development and application (WMP.523)	NA	NA	P94	Q94

### **III. Revisions to Q4 QNL Attachment A**

Revisions to the Q4 QNL, consistent with the revisions within Metrics Table 1 above, are provided as Attachment A titled “2025-02-01\_SDGE\_2024\_QNL\_Attachment A\_R1.pdf.”

Respectfully submitted,

*/s/ Laura M. Fulton*

Attorney for  
San Diego Gas and Electric Company