OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-02
SDG&E RESPONSE

Date Received: 05-09-2025
Date Submitted: 05-14-2025

I. GENERAL OBJECTIONS

1. SDG&E objects generally to each request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. No information protected by such privileges will be knowingly disclosed.

2. SDG&E objects generally to each request that is overly broad and unduly burdensome. As part of this objection, SDG&E objects to discovery requests that seek "all documents" or "each and every document" and similarly worded requests on the grounds that such requests are unreasonably cumulative and duplicative, fail to identify with specificity the information or material sought, and create an unreasonable burden compared to the likelihood of such requests leading to the discovery of admissible evidence. Notwithstanding this objection, SDG&E will produce all relevant, non-privileged information not otherwise objected to that it is able to locate after reasonable inquiry.

3. SDG&E objects generally to each request to the extent that the request is vague, unintelligible, or fails to identify with sufficient particularity the information or documents requested and, thus, is not susceptible to response at this time.

4. SDG&E objects generally to each request that: (1) asks for a legal conclusion to be drawn or legal research to be conducted on the grounds that such requests are not designed to elicit facts and, thus, violate the principles underlying discovery; (2) requires SDG&E to do legal research or perform additional analyses to respond to the request; or (3) seeks access to counsel's legal research, analyses or theories.

5. SDG&E objects generally to each request to the extent it seeks information or documents that are not reasonably calculated to lead to the discovery of admissible evidence.

6. SDG&E objects generally to each request to the extent that it is unreasonably duplicative or cumulative of other requests.

7. SDG&E objects generally to each request to the extent that it would require SDG&E to search its files for matters of public record such as filings, testimony, transcripts, decisions, orders, reports or other information, whether available in the public domain or through FERC or CPUC sources.

8. SDG&E objects generally to each request to the extent that it seeks information or documents that are not in the possession, custody or control of SDG&E.

9. SDG&E objects generally to each request to the extent that the request would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

10. SDG&E objects generally to each request that calls for information that contains trade

secrets, is privileged or otherwise entitled to confidential protection by reference to statutory protection. SDG&E objects to providing such information absent an appropriate protective order.

II. EXPRESS RESERVATIONS

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.

2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.

3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.

4. These responses are made solely for the purpose of this proceeding and for no other purpose.

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-02
SDG&E RESPONSE

Date Received: 05-09-2025
Date Submitted: 05-14-2025

III. RESPONSES

QUESTION 1

Regarding Vegetation Management Inspections:

On page 209 of its 2026-2028 Base WMP, SDG&E lists the Area Inspected for all Vegetation Management Inspection programs as "HFTD." On pages 57-60 of its 2026-2028 Base WMP, SDG&E describes evaluating high fire areas outside of the HFTD and explains why SDG&E has not proposed adding these areas to the HFTD. SDG&E states that some of these areas are of a lower priority for grid-hardening initiatives but does not mention other WMP activities.

a. Explain SDG&E's decision-making process for excluding the WUI and coastal canyons from SDG&E's 2026-2028 WMP Vegetation Management Inspection Programs and associated targets. Discuss the variables that contributed to this decision (e.g., geography, workforce, resources, effectiveness of other mitigations, etc.).

b. Does SDG&E plan to perform Detailed Inspection (WMP.494) in the WUI and coastal canyons during the 2026-2028 WMP cycle?
    i. If not, provide the estimated risk reduction achieved by performing Detailed Inspections to:
        1. The WUI
        2. Coastal canyons

c. Does SDG&E plan to perform Off-Cycle Patrols (WMP.508) in the WUI and coastal canyons during the 2026-2028 WMP cycle?
    i. If not, provide the estimated risk reduction achieved by adding Off-Cycle Patrols to:
        1. The WUI
        2. Coastal canyons

RESPONSE 1

a. The targets presented for Vegetation Management inspections are limited to the HFTD to remain consistent with the approach taken in SDG&E's Test Year 2024 GRC Decision.[1] SDG&E clarifies that Detailed Inspection (WMP.494) activities and Off-Cycle patrols, such as targeted species patrols, are performed outside the HFTD throughout its entire service territory, but these inspections are no longer in scope for WMP.

b. Yes, as described above, SDG&E plans to perform Detailed Inspection in the WUI and coastal canyons during the 2026-2028 WMP cycle.

[1] D.24-12-074 at 991, Finding of Facts 177, 178, 179.

b.i. N/A

c. Yes, as described above, SDG&E plans to perform Off-Cycle Patrols in the WUI and coastal canyons during the 2026-2028 WMP cycle.

c.i. N/A

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-02
SDG&E RESPONSE

Date Received: 05-09-2025
Date Submitted: 05-14-2025

QUESTION 2

Regarding Integrated Vegetation Management Activities:

In SDG&E's 2023-2025 Base WMP (pages 284-286), sections 8.2.3.6 High-Risk Species and 8.2.3.7 Fire-Resilient Right-of-Ways SDG&E includes four integrated vegetation management activities: Right Tree, Right Place (WMP.1325), Community Tree Rebate Program (WMP.1326), Land Services Vegetation Abatement (WMP.1327) and Fire Coordination Fuels Reduction MOU & Grant (WMP.1328). On page 215 of its 2026-2028 Base WMP, SDG&E lists Fuels Management (WMP.497) as its only IVM activity. SDG&E states that "because of the relative lack of vegetation density along its major transmission corridors, SDG&E does not engage in these traditional integrated vegetation management activities."

a. Does SDG&E plan to perform all or some of the activities that its 2023-2025 Base WMP describes for WMP.1325, WMP.1326, WMP.1327, and WMP.1328 during the 2026-2028 WMP cycle?

i. If yes, describe which activities SDG&E plans to perform and which it will discontinue during the 2026-2028 Base WMP cycle.

ii. For each of these activities its plans to perform during the 2026-2028 WMP cycle, explain why SDG&E excludes these activities from its 2026-2028 Base WMP.

iii. For each of these activities it will not perform during the 2026-2028 WMP cycle, explain SDG&E's decision-making process for discontinuing the activity. Discuss the variables that contributed to this decision (e.g., geography, workforce, resources, effectiveness of other mitigations, etc.).

RESPONSE 2

a. SDG&E does plan to perform some of the activities described for WMP.1325, WMP.1326, WMP.1327, and WMP.1328 during its 2023-2025 Base WMP during the 2026-2028 Base WMP cycle.

   i. SDG&E plans to perform Right Tree, Right Place; Land Services Vegetation Management Abatement; and Fire Coordination Fuels Reduction & Grant activities during the 2026-2028 Base WMP. SDG&E plans to discontinue the Community Tree Rebate Program during the 2026-2026 Base WMP cycle.

   ii. As stated in its 2023-2025 Base WMP, SDG&E's Right Tree, Right Place (WMP.1325) is part of its tree removal program (see page 277). SDG&E primarily engages customers with the option to remove incompatible trees during the inspection activity or during the tree pruning activity. In its 2026-2028 Base WMP Guidelines, Energy Safety created two new initiatives for Vegetation Management: IVM and Pruning and

Removal. For its Base 2026-2028 WMP, SDG&E opted not to categorize Right Tree, Right Place within IVM, and instead to reserve IVM solely for the activity of Fuels Management. SDG&E will continue to engage customers on the option to remove incompatible trees using the concept of Right Tree, Right Place during the inspection and tree pruning and removal activities during the 2026-2028 Base WMP.

Land Services Vegetation Management Abatement, and Fire Coordination Fuels Reduction & Grant are not categorized as activities within IVM in the 2026-2026 Base WMP. However, both activities are described under the new WMP section titled Partnerships 9.8 and will continue during the 2026-2028 Base WMP.

iii. SDG&E's Community Tree Rebate Program (WMP.1326) has been discontinued in 2025 to promote customer affordability and reflect SDG&E's authorized revenue requirements. SDG&E also believes it has substantively met the overall goal of the program to engage those customers eligible to participate in the program. The cessation of the program does not negatively impact the company's risk mitigation measures as the program is not primarily aimed at risk reduction.

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-02
SDG&E RESPONSE

Date Received: 05-09-2025
Date Submitted: 05-14-2025

QUESTION 3

Regarding Vegetation Management Quality Assurance and Quality Control:

On page 224 of its 2026-2028 WMP, SDG&E combines Detailed Inspections (WMP.494), Prune and Removal (Clearance)(WMP.501), and Pole Clearing (WMP.512) into a single quality check activity/row in Table 9-6: Vegetation Management QA and QC Activity Targets.

a. Complete the table below with a separate row for each activity containing activity-specific quantitative values for population/sample unit, annual population size, annual sample size, confidence level, and margin of error (MOE).

i. In the "Annual Sample Size" column, list the number of individual sample units that make up the sample rather than listing a percentage of the population.

Initiative/Activity Being Audited	Population / Sample Unit	Annual Population Size	Annual Sample Size	Confidence Level	Margin of Error (MOE)
Detailed Inspections (WMP.494)					
Prune and Removal (Clearance) (WMP.501)					
Pole Clearing (WMP.512)					

RESPONSE 3

SDG&E performs QA/QC throughout the calendar year following the completion of the scheduled vegetation management activities (Detailed Inspections; Pruning and Removal; Pole Clearing). SDG&E strives to complete a 15% audit for each activity. The sample population for each audit is dependent on the number of units completed for each respective activity, thus calculated based on historical averages. Note that Prune and Removal is dependent on the Detailed Inspection, therefore, an accurate method to calculate annual population size or sample size is not available. SDG&E includes in the table provided above an approximate value of the Annual Sample Size for each of the three activities.

Initiative/Activity Being Audited	Population / Sample Unit	Annual Population Size	Annual Sample Size	Confidence Level	Margin of Error (MOE)
Detailed Inspections (WMP.494)	Number of Trees Inspected	255,000	38,250	99%	3%

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-02
SDG&E RESPONSE

Date Received: 05-09-2025
Date Submitted: 05-14-2025

Initiative/Activity Being Audited	Population / Sample Unit	Annual Population Size	Annual Sample Size	Confidence Level	Margin of Error (MOE)
Prune and Removal (Clearance) (WMP.501)	Number of Trees Pruned/Removed	N/A	N/A	N/A	N/A
Pole Clearing (WMP.512)	Number of Poles Brushed	22,000	3,300	99%	3%

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-02
SDG&E RESPONSE

Date Received: 05-09-2025
Date Submitted: 05-14-2025

QUESTION 4

Regarding Larger QA/QC Sample Sizes for Enhanced Vegetation Management Activities in the HFTD:

On page 289 of its 2023-2025 WMP, SDG&E indicates that "a higher sampling percentage is used for some enhanced vegetation management activities in the HFTD, including a 100 percent post-trim audit of all completed trim and removal work generated from the off-cycle patrol (WMP.508) activities… Additionally, audits are performed on 100 percent of all work completed on tree trim "Memo" work orders." SDG&E's audit of a higher percentage of "some enhanced vegetation management activities in the HFTD" is absent from its 2026-2028 Base WMP.

a. Does SDG&E plan to perform a post-trim audit of completed trim and removal work generated from off-cycle patrol activities during the 2026-2028 WMP cycle?

i. If so, explain why SDG&E excludes this audit from its 2026-2028 Base WMP.

ii. If not, explain SDG&E's decision-making process for discontinuing this audit. Discuss the variables that contributed to this decision (e.g., geography, workforce, resources, effectiveness of other mitigations, etc.).

b. Does SDG&E plan to audit work completed on tree trim "Memo" work orders during the 2026-2028 WMP cycle?

i. If so, explain why SDG&E excludes this audit from its 2026-2028 Base WMP.

ii. If not, explain SDG&E's decision-making process for discontinuing this audit. Discuss the variables that contributed to this decision (e.g., geography, workforce, resources, effectiveness of other mitigations, etc.).

RESPONSE 4

a. Yes, SDG&E plans to perform post-trim audits of completed pruning and removal work generated from off-cycle patrol activities during the 2026-2028 WMP cycle.

   i. For the 2026-2028 Base WMP, SDG&E will integrate a post-trim audit of work generated from the off-cycle patrols into its standard auditing processes. Doing so will align overall audit practices and provide procedural consistency. Upon further evaluation of its audit scope, SDG&E believes that utilizing a representative sample population to perform its audits is effective in determining contractor compliance and work quality. SDG&E may elect to conduct a higher percentage of audits on work generated from the off cycle HFTD patrol than the standard 15%. However, this may be

influenced by other vegetation management activities concurrently in process within the same VMA, and the most efficient and effective utilization of contractor resources.

ii. Please see the response to i. above.

b. Yes, SDG&E plans to audit work completed on tree trim "Memo" work orders during the 2026-2028 WMP cycle.

i. For the 2026-2028 Base WMP, SDG&E will integrate a post-trim audit of work generated from the off-cycle patrols into its standard auditing processes. Doing so will align overall audit practices and provide procedural consistency. Upon further evaluation of its audit scope, SDG&E believes that utilizing a representative sample population to perform its audits is effective in determining contractor compliance and work quality. SDG&E may elect to conduct a higher percentage of audits on work generated from the off cycle HFTD patrol than the standard 15%. However, this may be influenced by other vegetation management activities concurrently in process within the same VMA, and the most efficient and effective utilization of contractor resources.

ii. Please see the response to i. above.

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-02
SDG&E RESPONSE

Date Received: 05-09-2025
Date Submitted: 05-14-2025

QUESTION 5

Regarding Benchmarking Performance of Vegetation Management Operations Across Multiple VMAs:

On page 290 of its 2023-2025 Base WMP, SDG&E states it "is considering the development of compliance-based audits as a measure of system status and reliability. Such audits may be performed across multiple VMAs and create benchmarking for the performance of vegetation management operations. The anticipated timeline to implement compliance-based audits is 2 to 3 years."

a. Provide an update on the progress of using audits to benchmark the performance of vegetation management operations across multiple VMAs.

b. Provide a summary of findings, lessons learned, and improvements to vegetation operations that SDG&E has implemented as a result of considering compliance-based audits as a measure of system status and reliability.

RESPONSE 5

a. SDG&E continues to explore the possibility of expanding its audit program to include a compliance-based component for the activity of tree pruning. In its current state the post-trim audit program is scaled and scoped to occur at the individual Vegetation Management Area (VMA) level focusing on contractor performance and work quality. A compliance-based audit would target instances of non-compliant tree clearances and incorporate root-cause analysis as part of the procedure. Compliance-based audits could be conducted throughout the year exclusive of the schedule for routine tree trimming activities.

b. Developing a compliance audit would require enhancements to SDG&E's current work management system (Cityworks) including the design, development, and testing of integrating multiple VMAs into the system's randomization tool, creation of new electronic forms to support data entry, and back-end reporting to track audit results, among others. Other considerations in expanding the audit scope include the required increase in contractor staffing resources and additional costs for the program. SDG&E has also considered employing the use of remote sensing technology as a potential tool in a compliance-driven audit. For example, LiDAR could be used on a broad scale and as a mechanism in accurately identifying non-compliant trees. Cost and frequency of LiDAR capture and the timeliness of data processing are additional considerations for viability. SDG&E will continue to explore this issue and currently continues to anticipate a timeline of 2 to 3 years to complete its evaluation of possible implementation of a compliance-based audits in its vegetation management program.

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-02
SDG&E RESPONSE

Date Received: 05-09-2025
Date Submitted: 05-14-2025

QUESTION 6

Regarding Past Due Work Order Quantities and Constraint Types: On page 228 of its 2026-2028 Base WMP, SDG&E lists 9,916 past due work orders in Tables 9-7 and 9-8. On page 292 of its 2023-2025 Base WMP, SDG&E lists 981 past due work orders. a. Describe the factors that have primarily led to an approximately 900 percent increase in past due work orders from the time of 2023-2025 Base WMP submission to the time of the 2026-2028 Base WMP submission.

RESPONSE 6

The difference in the number of past due work orders provided in the 2023-2025 Base WMP compared with the numbers of past due work orders provided in the 2026-2028 Base WMP can be attributed to the differences in the methodology of deriving the data, and not the result of a substantial increase in past due work orders. In its 2026-2028 Base WMP, SDG&E reported the total number of open work orders, not past due work orders. SDG&E makes the correction in tables provided below. SDG&E will additionally provide these corrected tables in its forthcoming errata.

OEIS Table 9-7: Number of Past Due Vegetation Management Work Orders Categorized by Age and HFTD Tier

HFTD Area	**0-30 days**	**31-90 days**	**91-180 days**	**181+ days**
HFTD Tier 2	75	225	5	1
HFTD Tier 3	300	29	1	0

OEIS Table 9-8: Number of Past Due Vegetation Management Work Orders Categorized by Age and Priority Levels

Priority Level	**0-30 days**	**31-90 days**	**91-180 days**	**181+ days**
High Priority	40	12	2	0
Low Priority	335	242	4	1

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-02
SDG&E RESPONSE

Date Received: 05-09-2025
Date Submitted: 05-14-2025

QUESTION 7

Regarding Financial Attribute Components:

On page 29 of SDG&E's 2026-2028 Base WMP, SDG&E discusses two general components of the financial attribute: societal damage and utility repair costs.

a. Provide information on the magnitude of these two components in comparison to one another, including the following individual portions for each component:

i. Physical damage, lost wages, and relocation costs for societal damage

ii. Labor and materials for utility repair

b. Provide an example of how total cost is calculated showing the various societal damage and utility repair monetization components.

RESPONSE 7

In accordance with CPUC Decision (D.) 22-12-027, SDG&E is shifting from its previous reliance on the Multi-Attribute Value Framework (MAVF) to a Cost-Benefit Analysis (CBA) approach. Section 5.1 introduces this new methodology, offering an initial outline that will be further developed in SDG&E's upcoming 2025 Risk Assessment Mitigation Phase (RAMP) filing. This section serves to bridge the Wildfire Mitigation Plan (WMP) with broader enterprise risk management efforts.

This section introduces the financial attribute and explains how it can be used to capture two general categories of costs: societal damage (e.g., including physical damages, lost wages, and relocation costs) and utility repair costs (e.g., labor, materials). This approach is intended to reflect how financial impacts may be consistently calculated and applied across SDG&E.

Specifically for this WMP, SDG&E's wildfire consequence model estimates societal damages by assigning monetary values to projected structure losses and acres burned, based on outputs from Technosylva wildfire simulations. SDG&E's wildfire consequence model does not estimate utility repair costs, because of the difficulty of estimating the number of assets impacted and the severity of the impact and because the high-level dollar estimates for utility repairs would be relatively insignificant when compared to the more substantial costs associated with structural losses and acres burned.

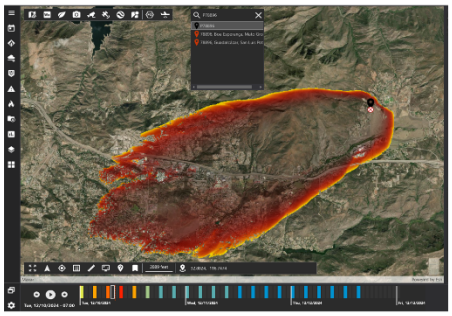
In the PSPS Risk Model, the financial impact of a de-energization event is estimated based on several key factors: the assumed duration of the PSPS event, the number and types of customers

affected, and cost proxies informed by the federal per diem rates for lodging, meals, and incidentals applicable to San Diego County.

a) Not applicable – see explanation above.
b) The following is an example of how SDG&E quantifies wildfire risk. This example was originally shared during the Risk Modeling Working Group session held on March 26, 2025.

Prompt 1-b: Wildfire: From Simulated Ignitions to Monetized Risk

For every pole in SDG&E's service territory:



SDG&E 2025 Assumptions:
- $2,350/acre burned
- $1M/structure destroyed
- 0.00618 Fatalities/structure destroyed
- 2025-VSL: $15.97M/fatality
- 4 Serious Injuries per fatality

Variable	Impact
Acres Burned	7,738
Buildings Destroyed	1,416

Variable	M$
Acres Burned	$18
Buildings Destroyed	$1,416
Fatalities	$140
Total	$1,574

Attribute	Sub-Attribute	M$
Safety	Fatality	$140
	Serious Injury	$140
Reliability	---	$0.00
Financial	---	$1,434

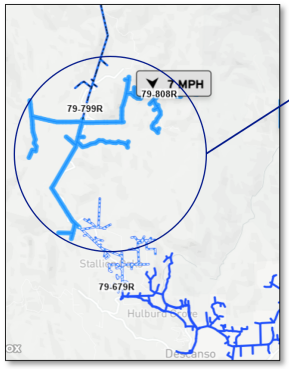
Example:

Post-PSPS Patrol finding (Dec 2024) in Tier 3.
Pole P78896: Broken down guy.

SDGE 7

Prompt 1-c: PSPS de-energization example (24hours)

Example: 79-808R Recloser



	Residential	C&I	PSPS Critical	AFN	Urgent	Essential	Sensitive	Total
Number of Customers	47	23	1	20	0	0	0	91
SME Safety Scaling factor	1	1	20	5	10	10	10	---

Attribute	Total Safety Customers	Fatalities per CMI	Fatalities	Sub-Attribute	K$
Safety	169	169e-10	2.43e-5	Fatality	$0.387
				Serious Injury	$0.387

Attribute	Total Customers	2025-$/CMI	K$
Reliability	70	$3.85	$388.08

Attribute	Customer Type	Total Customers	2025-$	K$
Financial	Residential	47	$482	$22.60
	C&I	23	$1,446	$33.26

Summary:
- Safety: $0.774k (0.17%)
- Reliability: $388.1k (87.3%)
- Financial: $55.86k (12.6%)
- Total: $444.7k

Assumptions:
- 1 Fatality per 10 billion customer minutes de-energized
- For Residential customers a $482 cost per event is calculated using the per diem rates applicable to San Diego, CA in Q4-2024, with the assumption of accommodating 4 family members per customer meter.
- C&I customers, a $1,446 cost per event is estimated4

SDGE

Safety Customers = (47-20)*1 Resi + (23-1) * 1 C&I + 1*20 PSPS Critical +20*5 AFN = 169
Reliability Customers = 47 Resi +23 C&I = 70

9

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-02
SDG&E RESPONSE

Date Received: 05-09-2025
Date Submitted: 05-14-2025

QUESTION 8

Regarding Climate Change Projections:

On page 30 of SDG&E's 2026-2028 Base WMP, SDG&E notes that a system-wide climate adaptation vulnerability assessment (CAVA) is being analyzed to examine mid- and end-century climate change projections. SDG&E notes that it plans to update its risk modeling methodology when new data becomes available.

a. Provide a timeline for the completion of this examination and its implementation into the risk modeling methodology. This timeline must include:

i. Discreet steps within the timeline for implementation

ii. Expected completion dates for each step, down to quarter granularity (i.e., Q4 2025)

RESPONSE 8

SDG&E is actively exploring multiple methodologies to model future wildfire risk, with particular emphasis on projecting potential increases in acres burned relative to historical baseline. A key objective is to align these projections as closely as possible with the latest climate science, specifically the CMIP6 (Coupled Model Intercomparison Project Phase 6) simulation outputs, which will inform California's upcoming Fifth Climate Change Assessment, scheduled for release in 2026.

Currently, the most recent wildfire projection dataset available on Cal-Adapt is based on earlier CMIP5 simulations, specifically the work by Westerling (2018). However, this dataset is now considered outdated. In response, the UC Merced research team is actively working to update wildfire projections using CMIP6 data. These updated projections will provide a more accurate and forward-looking foundation for assessing wildfire risk under future climate scenarios and will be incorporated into the 2026 Assessment.

Once the CMIP6-based wildfire projections are made available, SDG&E will review, validate, and incorporate the data into its risk modeling framework, pending approval by its internal subject matter experts (SMEs).

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-02
SDG&E RESPONSE

Date Received: 05-09-2025
Date Submitted: 05-14-2025

QUESTION 9

Regarding Consequence Models:

On page 36 of SDG&E's 2026-2028 Base WMP, Figure 5-6 depicts the differences between the WiNGS-Ops and WiNGS-Planning consequence models.

a. Provide a description of any additional differences between the two models not captured within Figure 5-6.

b. Explain why egress is only included as a part of the WiNGS-Planning model.

c. Explain how the egress factor is calculated.

RESPONSE 9

a) Figure 5-6 depicts all major model source and process step differences between the consequence models across both the operational and planning versions of the WiNGS model. Additional differences of each model exist and are summarized within the model technical documentation. For more details, please refer to Appendix B: Supporting Documentation For Risk Methodology and Assessment, Section 2: Summary Documentation. The notable difference related to the consequence models not captured directly in Figure 5-6 between the two versions of the WiNGS is the risk unit utilized. WiNGS-Planning uses a cost-benefit ratio (CBR) framework unit as described in the up-coming filing for the 2025 Risk Assessment and Mitigation Phase (RAMP) report for its risk score, whereas WiNGS-Ops will upgrade to leverage the same framework in the future and currently uses a weighted risk score approach using a risk spend efficient (RSE) framework as described by SDGE's 2021 Risk Assessment and Mitigation Phase (RAMP) report. WiNGS-Ops is expected to align with the cost-benefit framework by end of Q3-2025.

b) As the WiNGS-Ops model is focused on PSPS and emergency decision making, SDG&E does not incorporate egress modeling into its WINGS-Ops model, based on the operational roles and responsibilities defined during wildfire and PSPS de-energization events. This decision reflects both the utility's limited authority in evacuation matters and the established structure of emergency response coordination within California.

Primarily, SDG&E does not intend to use egress model outputs during PSPS activations or active wildfire incidents. This is because utility personnel do not have the authority to initiate or request evacuations, nor are they part of the formal decision-making process regarding evacuation orders. These decisions are made by the Incident Commander, who operates within a Unified Command structure composed of first responder agencies, most notably fire and law enforcement authorities.

Utilities, including SDG&E, typically serve as cooperators in these incidents, providing support with utility knowledge but not directing public safety actions.

The decision to evacuate is multifaceted and considers a range of dynamic factors such as fire behavior, weather conditions, terrain, and population density. Utilities are generally not a significant factor in this analysis. Law enforcement agencies are the primary leads for executing evacuations, and their decisions are informed by real-time situational awareness and public safety priorities.

While SDG&E recognizes the value of egress modeling as a tool for understanding potential evacuation challenges, it does not currently view it as a best practice for utility-led operational platforms. Instead, SDG&E focuses on strengthening partnerships with fire and law enforcement agencies to enhance coordination and public safety. This includes participating in joint training exercises, leveraging shared communication platforms, and supporting public messaging during emergencies.

By maintaining clear boundaries around its operational role and deferring evacuation decisions to the appropriate authorities, SDG&E ensures that its wildfire and PSPS response efforts remain aligned with the broader emergency management framework in California.

c) The Egress model is intended to be included in the wildfire consequence model (safety attribute) of WiNGS-Planning. The egress model is a relative ranking model that helps in identifying areas in SDG&E service territory that are most vulnerable to evacuation constraints during a wildfire event. SDG&E completed the first iteration of the model by the end of 2022 and adoption in WiNGS-Planning was completed in 2023.

At any given location, the model simulates different (stochastic) potential scenarios of movements of people considering road capacity constraints during the evacuation process. Each scenario is triggered by a simulated match-drop ignition (spread, direction, duration), predefined evacuation routes, and evacuation travel times. Random scenarios are created based on a set of Subject Matter Expert assumptions, 8-hour unsuppressed wildfire simulations created by Technosylva, historical weather conditions, population information, and road-street networks and geometries.

SDG&E's egress model is predominantly influenced by these two papers:

- Grajdura, Sarah, Sachraa Borjigin, and Deb Niemeier. "Fast-moving dire wildfire evacuation simulation." Transportation research part D: transport and environment 104 (2022): 103190.

- Kim, Sangho, Betsy George, and Shashi Shekhar. "Evacuation route planning: scalable heuristics." Proceedings of the 15th annual ACM international symposium on Advances in geographic information systems. 2007.

SDG&E emphasizes that this model is for mitigation planning and scoping only and is not intended to be used during an evacuation planning or during an active real-evacuation event. This model is not used to create a set of strategies or define best practices to ensure the safe and efficient evacuation of communities in the path of an advancing wildfire. In the event of a wildfire evacuation event, SDG&E will work closely with local authorities, emergency responders, law enforcement, and other stakeholders to assist with evacuation efforts based on known real time conditions and available information.

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-02
SDG&E RESPONSE

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QUESTION 10

Regarding Attributes for Wildfire Consequence:

a. On page 38 of SDG&E's 2026-2028 Base WMP, SDG&E Table 5-4 provides estimates used to calculate various risk components.

i. For the safety component, SDG&E states that it is using an assumption of a 0.00617 factor to estimate the total number of equivalent fatalities per structure destroyed. Provide documentation justifying the basis for this assumption, including the analysis conducted on the CAL FIRE data set as discussed within SDG&E Table 5-4.

ii. For the financial component, SDG&E states that it is using an assumption of $2,350 per acre burned for suppression and restoration cost. Provide documentation justifying the basis for this assumption, including any analysis performed.

b. On pages 39 and 40 of SDG&E's 2026-2028 Base WMP, the financial attributes for PSPS and PEDS consequences are discussed in SDG&E Table 5-5 and SDG&E Table 5-6, respectively. Provide additional discussion and justification on the motivation and basis for the differences in financial attribute assumptions used for PSPS and PEDS. Include any supporting documentation and analysis that led to the financial attribute assumptions used.

RESPONSE 10

a) i) Refer to "SDGE_Wildfire_Fatality_Structures_ratios_2025_05_12.xlsx" for details on how this assumption is calculated

a) ii) Refer to "SDGE_Cost_per_acre_2025_05_09.xlsx" for details on how this assumption is calculated

b) The differences in how financial estimates are calculated for PSPS and PEDS events are based on the assumption that PSPS events typically involve longer restoration times, with an assumed duration of approximately 24 hours per event. Due to this extended duration, a per-diem cost estimation method is applied. This approach accounts for additional customer impacts, including the need for meals and lodging during the de-energization period.

In contrast, PEDS events are typically shorter in duration and occur with less predictability, often being characterized as "random" in nature. Due to their limited duration, it is assumed that these events are less likely to necessitate extended accommodations or meal provisions. As a result, the financial estimates for PEDS events do not include per-diem costs for meals and lodging, leading to lower overall cost assumptions.

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-02
SDG&E RESPONSE

Date Received: 05-09-2025
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To estimate the financial impact of a PEDS event, SDG&E applies a simplified cost assumption equivalent to 10% of the expected reliability impact. This percentage is derived from a high-level approximation of post-patrol costs associated with overhead line inspections conducted during elevated or extreme fire weather conditions. While this estimate is not event-specific, SDG&E subject matter experts consider it as a reasonable proxy to reflect the variability in financial impacts across different PEDS events. This approach acknowledges that not all PEDS events incur the same level of cost. With this approach, the financial estimate is intended to scale proportionally with the simulated PEDS event duration and the number of customers affected by a given PEDS outage, providing a consistent approach for estimating financial impact in the absence of detailed event-level data.

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-02
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END OF REQUEST