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OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-03
SDG&E RESPONSE

Date Received: 05-13-2025
Date Submitted: 05-16-2025

I. GENERAL OBJECTIONS

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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

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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.

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III. RESPONSES

QUESTION 1

Regarding Contractor Employees with Minimum Qualifications

On pages 229 through 231 of its 2026-2028 Base WMP, SDG&E lists the worker titles, qualifications, and training associated with its vegetation management workforce. SDG&E indicates that for several positions (Pre-Inspector, Tree Trim General Foreperson/Supervisor, and Tree Trimmer), the total number of employees with each position is greater than the number of minimally qualified employees. This suggests that some employees holding the Pre-Inspector, Tree Trim General Foreperson/Supervisor, or Tree Trimmer title do not possess minimum qualifications.

a. Are there employees with each of the above worker titles who do not hold the minimum qualifications for their position?

    i. If yes, list other factors associated with each worker title that contribute to a hiring decision for an employee who does not possess minimum qualifications.

    ii. If no, explain why there is a difference between the number of employees with minimum qualifications and the total number of employees.

RESPONSE 1

After further investigation with its contractors, SDG&E has determined that it erred in its initial reporting of the number of contracted employees who possess minimum qualifications compared to the total number of employees. SDG&E can confirm that all contracted employee positions including Pre-Inspector, Tree Trim General Foreperson/Supervisor, and Tree Trimmer possess the minimum qualifications. The error was related to the number of employees who possess specific certifications, which are not a requirement of employment. SDG&E will update the number of contracted employees in Revision 1 of the 2026-2028 WMP.

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QUESTION 2

Regarding Fire Potential Index for Action Initiation

On page 252 of its 2026-2028 Base WMP SDG&E states that, "The FPI reflects key variables such as the state of native grasses across the service territory ('green-up'), fuels (ratio of DFM component to LFM component), and weather (sustained wind speed and dew point depression). Each of these variables is assigned to a numeric value. Those numeric values are summed up to generate a Fire Potential Index value from 0 to 17 that expresses the degree of fire threat expected for each of the seven days in the forecast. The numeric values are grouped as 'Normal', 'Elevated', or 'Extreme'."

a. Provide the following information regarding the Fire Potential Index (FPI) breakpoints and how each is used in the initiation of PSPS events.

      i. A detailed description of the weather conditions associated with each level of the FPI breakpoint (i.e., Normal, Elevated, and Extreme).

      ii. The initiation criteria for PSPS events for FPI breakpoint (i.e., Normal, Elevated, and Extreme).

b. Provide the following information regarding the FPI breakpoints and how they are used for actions taken in the field.

      i. A detailed description of actions taken in the field that are associated with each FPI breakpoint (i.e., Normal, Elevated, and Extreme).

RESPONSE 2

a.i. Please reference the attached document titled "SDGE Response OEIS-P-WMP_2025-SDGE-03_Q2_Fire Potential Index (FPI).pdf." Weather conditions are a function of dewpoint depression and sustained wind speeds. Since each break point is a function of dead fuel moisture, live fuel moisture, grass NDVI, dewpoint depression and sustained wind speeds, no single value of wind or dewpoint depression defines each breakpoint - they are defined by the combination of all variables and are based on a backcast against historical fires as shown in the figures below.
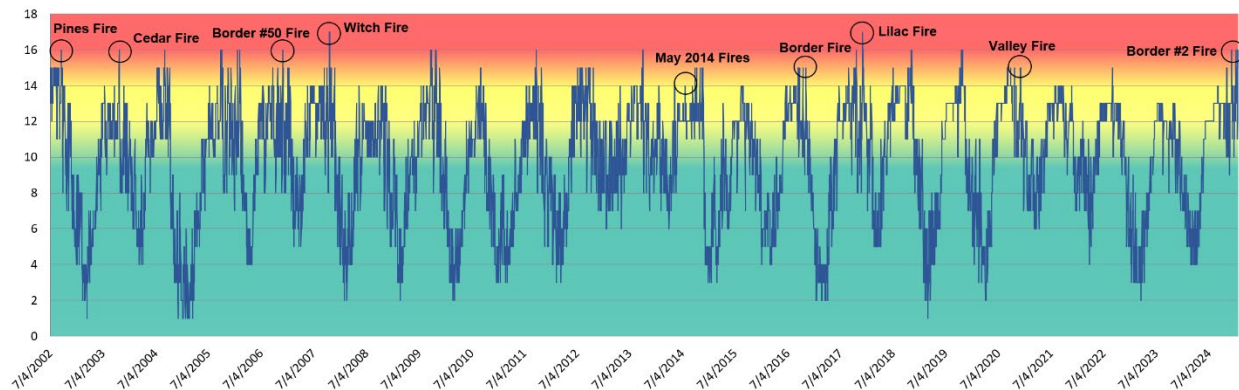
a.ii. The FPI is a consideration for PSPS but not the only one. The following outlines the procedure for initializing a PSPS from a Meteorology perspective:

> 1. Has the National Weather Service (NWS) provided any indication in their forecast discussion, forecast products or social media communications that a Red Flag Warning or critical fire weather conditions may be possible during the forecast period?

> 2. Has the GACC in Riverside, CA given any indication in their forecast discussion/products or social media communications of a "High Risk Day" or any Santa Ana Wildfire Threat Index rating may be issued?

> 3. Does the SDG&E Fire Potential Index show that a combination of fuel dryness and Santa Ana winds may lead to the potential for large wildfire (FPI 14 or above)?

> 4. Do initial wind speed forecasts generated by SDG&E meteorology models (WRF and AI forecasting) indicate a reasonable probability of reaching alert speeds for any of the SDG&E weather stations?

> 5. Do the forecasted weather conditions warrant a convening of executive leadership to discuss the potential for PSPS Protocols?

b.i. SDG&E has several procedures that outline company responsibilities and action required for each breakpoint.

Electric Distribution Operations (EDO) has procedures during SDG&E fire conditions that outline the distribution operating restrictions and notifications required for overhead facilities during various operating condition levels, to include operating under NORMAL conditions (1-11), ELEVATED Conditions (12-14), and EXTREME Conditions (15-17).

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Electric Grid Operations at SDG&E has fire preparedness and transmission restrictions that outline the transmission operating restrictions and notifications required for overhead facilities during various operating condition levels, to include operating under NORMAL conditions (1-11), ELEVATED Conditions (12-14) , and EXTREME Conditions (15-17).

SDG&E operations and maintenance has a wildland fire prevention plan that outlines the minimum wildland fire prevention standards for all system Operations & Maintenance work conducted in wildland areas of our service territory. The plan provides a wildland fire risk and mitigation matrix based on work activity within Fire Potential Index (FPI) or Project Activity Level (PAL) areas to set a level for minimum fire prevention and suppression tools. The Fire Potential Index (FPI) (1-17) is a comprehensive assessment of fire risk, used as a tool for making operation & maintenance decisions related to fire prevention. The tool converts environmental, statistical, and scientific data into an easily understood forecast of short-term fire threat. The 7-day forecast is used for planning purposes, while the daily FPI is used for work activities. The FPI is used to determine the fire potential for each day (Normal, Elevated, or Extreme).

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QUESTION 3

Regarding SDG&E's Response to SDGE-25U-01

In Appendix D, pages 1-2, of SDG&E's 2026-2028 Base WMP, SDG&E provides its response to SDGE-25U-01. Calculating Risk Scores Using Maximum Consequence Values.

a. In its response, SDG&E states that "Moving forward, the new risk event probability distribution outputs, along with statistical distribution metrics such as mean and various percentiles, will be used to inform future optimal mitigation prioritization decisions."

    i. When does SDG&E intend to start using the new outputs?

    ii. If the new outputs have been implemented already, provide a detailed description of how the new risk event probability distributions impacted SDG&E's risk model scores. This must include, at a minimum:

        (1) A list showing any shifts to risk ranking prioritizations.
        (2) Heatmaps of risk distributions across SDG&E's territory showing changes in risk scores.

b. In its response, SDG&E states that "the wildfire risk modeling approach will continue to be updated" and that "assumptions and inputs used in the models will be continuously reviewed and enhanced."

    i. What frequency does SDG&E plan on updating its risk models?

    ii. What frequency does SDG&E plan on reviewing and enhancing assumptions and inputs?

    iii. Provide SDG&E's timeline including concrete milestones and associated dates for future risk modeling updates.

RESPONSE 3

a.

  i.   SDG&E has begun adopting risk event probability distribution outputs from its WiNGS-Planning model as of Q1 2025 and first reported on them in the 2026-2028 WMP base filing.

  ii.   The new risk event probability distributions, derived from the WiNGS-Planning model, have been implemented in alignment with the Cost-Benefit Ratio (CBR) framework outlined in SDG&E's forthcoming 2025 Risk Assessment and Mitigation Phase (RAMP)

filing. This represents a significant methodological shift from the Risk Spend Efficiency (RSE) framework used in the 2021 RAMP filing—as required by the CPUC.

Under the new framework, risk is quantified in monetary terms, replacing the Multi-Attribute Value Framework (MAVF) previously used. The updated model outputs include comprehensive statistical distribution metrics—such as mean, P95, P99, and maximum values—providing a probabilistic view of risk events. This contrasts with the earlier approach, which relied on a single deterministic risk score per asset.

Key impacts of this upgrade include:
- The probabilistic modeling approach offers greater transparency into the range and likelihood of potential risk events, rather than a single-point estimate.
- The use of trained predictive models to estimate ignition events introduces a more data-driven and forward-looking risk assessment capability.
- Technosylva simulation data used in the old model uses a 8 hour run simulation, whereas the new model uses a 24 hour run simulation

Due to the change in risk units and modeling methodology, direct comparisons of risk scores between the old and new frameworks are not feasible. Instead, changes in risk rankings could provide a lens through which to assess the impact of the new model. However, comparing ranking outputs from the two models is further complicated due to differences in GIS data snapshots associated with the official model runs dates, which reflect changes in the electric infrastructure over time, such as installation of new sectionalizing devices, undergrounding of overhead lines, covered conductor of existing bare wires, thereby introducing variability unrelated to the modeling framework change itself.

For a list of segment ranking comparisons, please see attached file titled "SDGE Response OEIS-P-WMP_2025-SDGE-03__Q3_rank_summary.xlsx."

(2) SDG&E does not currently have a comparison between risk scores generated under the previous MAVF methodology and those produced using the new Cost-Benefit framework. Developing a meaningful comparison would require substantial resources and the application of several assumptions. However, SDG&E could generate heatmaps illustrating shifts in risk rankings across feeder segments within its service territory, but it would take several weeks to complete. SDG&E can begin this work, once OEIS confirms that it would like SDG&E to spend weeks creating these heatmaps.

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b.

i. SDG&E's risk models are continuously in the process of development and review for potential enhancements and currently follow a minimum yearly cadence of release of new production versions.

ii. SDG&E's review and enhancement of assumptions and inputs for its risk models coincide with the release of each new production version.

iii. SDG&E maintains a proactive and iterative approach to enhancing its risk modeling capabilities. As part of our commitment to continuous improvement, SDG&E reviews its risk models annually. This process includes a thorough evaluation of model performance, integration of new data, and consideration of feedback from both intervenors and the Office of Energy Infrastructure Safety (OEIS). SDG&E prioritizes and execute updates based on this feedback to ensure our models remain robust, transparent, and aligned with evolving risk landscapes.

Looking ahead, SDG&E's roadmap for future risk modeling enhancements is guided by the Risk Modeling Improvement Plan outlined in the 2026–2028 WMP, Section 5, OEIS Table 5-6: Utility Risk Assessment Improvement Plan, as well as any feedback collected in the Risk Modeling Working Groups where SDG&E is actively participating

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QUESTION 4

Regarding SDG&E's Response to SDGE-23B-04

In Appendix D, pages 3-4, of SDG&E's 2026-2028 Base WMP, SDG&E provides its response to SDGE-23B-04. Incorporation of Extreme Weather Scenarios into Planning Models.

a. In SDG&E's response, SDG&E states that its latest model methodology estimates "upper tail risk, which includes rare and extreme scenarios." On page 51 of SDG&E's 2026-2028 Base WMP, SDG&E states that it "does not currently analyze extreme events or highly uncertain scenarios" and that "the WiNGS-Planning model is designed to incorporate historical weather conditions experienced within the service territory."

    i. Describe how "rare and extreme scenarios" differ from "extreme events or highly uncertain scenarios" in these two instances.

b. On page 51 of SDG&E's 2026-2028 Base WMP, SDG&E states that "the potential incorporation of climate change scenarios based on the latest climate modeling projection datasets that are being produced with the support from California Energy Commission are currently being evaluated."

    i. Provide a timeline with concrete milestones and dates for SDG&E's evaluation for integration of climate change scenarios.

c. In SDG&E's response, SDG&E states that the framework allows SDG&E to "generate statistical estimates of potential wind events over the maximum asset life of its system."

    i. What estimates did SDG&E use for maximum asset life, given that the fire behavior scenarios used span the years 2013 to 2021?

    ii. Describe how SDG&E integrated and estimated the maximum asset life into risk modeling.

RESPONSE 4

  a)
      i.   In the context of the reference on page 3 of Appendix D, SDGE-23B-04. Incorporation of Extreme Weather Scenarios into Planning Models, "rare and extreme scenarios" is referring to the upper tail risk interval of the probabilistic distribution that accounts for rare but catastrophic risk events. The full probabilistic distribution of risk events leveraging Technosylva's outputs calculated under extreme fire weather days are currently accounted for in SDG&E's risk modeling framework. The reference on page 51 of the 2026-2028 Base WMP, from Section

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5.3.2 Extreme-Event/High Uncertainty Scenarios, is in the context of rare and extreme risk event hazards that are not accounted for in SDG&E's current risk modeling, including black swan events such as acts of terrorism, multi-hazard scenarios such as ignitions from another source during a PSPS, extended drought, etc.

b)

   i.   SDG&E is 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 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 aim to reflect 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).

c)

   i.   A 5 million simulation run was performed leveraging Probability of Ignition (POI) model outputs and fire behavior scenarios from Technosylva's WRRM model that include weather conditions observed from 2013 to 2021 to simulate annual wildfire risk event scenarios, effectively equating 5 million years being simulated. The maximum asset life is modeled for Combined Covered Conductor and Undergrounding with an assumed lifespan of 55 years in alignment with guidance from the with the Electric Undergrounding Program (EUP) risk modeling reporting requirements established by Energy Safety pursuant to Senate Bill 884.

   ii.   Maximum asset life is utilized to estimate projected risk reduction benefits over the life of the asset as part of the calculation of Cost Benefit Ratio (CBR) metrics for each mitigation type, which account for annual inflation and various benefit discount rates scenarios over that lifetime. For further details on how CBR metrics are calculated, see Section 6.2.1.2 Risk Impact of Activities in SDG&E's 2026-2028 WMP report.

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QUESTION 5

Regarding SDG&E's response to SDGE-25U-02

In Appendix D, pages 5-6, of SDG&E's 2026-2028 Base WMP, SDG&E provides its response to SDGE-25U-02 Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety.

In SDG&E's response, SDG&E describes monthly meetings held focusing on WMP activities and topics. Provide the dates and topics associated with each meeting held.

RESPONSE 5

Please see attached document titled, "SDGE Response OEIS-P-WMP_2025-SDGE-03_Q5.pdf."

QUESTION 6

Regarding SDG&E's response to SDGE-25U-03 In Appendix D, pages 7-29, of SDG&E's 2026 2028 Base WMP, SDG&E provides its response to SDGE-25U-03. Third-Party Recommendations for Model Improvements.   In Table 4-1: WiNGS-Planning Risk Model Updates, SDG&E provides a status of "Not Applicable" for the following recommendations: CHI Update and Mean Value Assessment. Explain why these recommendations are listed as "Not Applicable."

RESPONSE 6

In Table 4-1: WiNGS-Planning Risk Model Updates, SDG&E initially marked the CHI Update and Mean Value Assessment recommendations as "Not Applicable" incorrectly. These entries will be corrected to reflect their true status:

- The CHI update has been completed and subsequently removed from the WiNGS-Planning model, as the integration of WiNGS-Ops into WiNGS-Planning now captures this information.
- The Mean Value Assessment is currently underway, with completion anticipated before 2027. With the transition to a probabilistic risk assessment framework, SDG&E considers this requirement to be almost completed through the enhanced modeling approach.

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END OF REQUEST