OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-05
SDG&E RESPONSE

Date Received: 05-17-2025
Date Submitted: 05-21-2025

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.

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III. RESPONSES

QUESTION 1

Regarding Database(s) Used for Data Storage:

On page 288 of its 2026-2028 Base WMP, SDG&E lists the different databases used for data storage among its various enterprise systems. SDG&E indicates several databases that are in use (Oracle, SAP Hana, Azure, AWS, Proprietary Databases, etc.).

a. Provide an overview of any data governance plan that SDG&E has in place.

b. Provide a description of SDG&E's ability to migrate data across systems, such as between third-party software and internal proprietary databases, if any.

i. If migration of data across systems is not possible, what internal plan does SDG&E have to ensure complete data migration in the future?

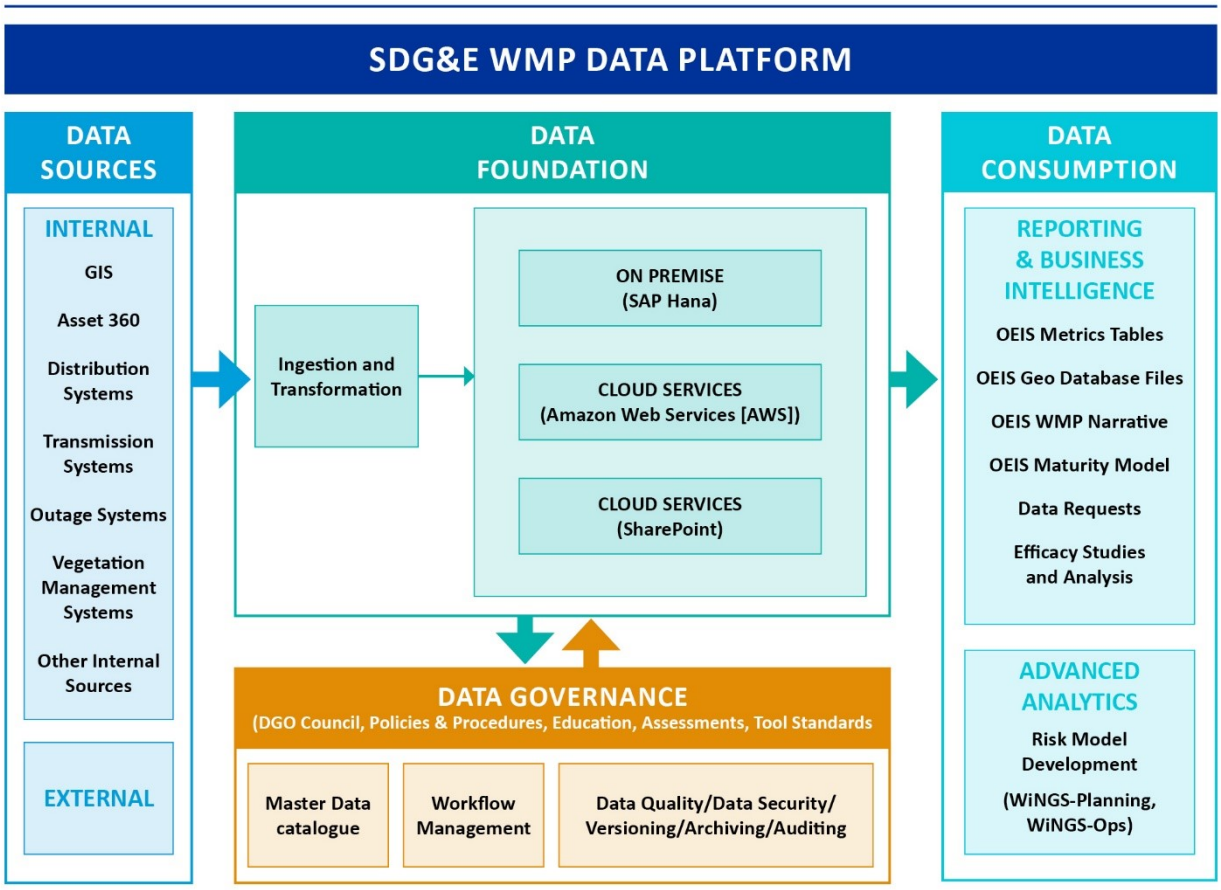
RESPONSE 1

a. The Enterprise Data Governance Office provides strategies to promote clean, organized, and easily accessible data. Data governance processes and controls are documented for the enterprise systems leveraged in the WMP Data Platform. The Enterprise Data Catalog is comprised of two main components, SAP Hana and AWS. Collibra, DataZone, and Glue, are used for creating data asset inventories, data stewardship, metadata capture, and governance.

   The WMP Data Platform provides a centralized data repository that enables consistent, reliable, and automated reporting of mandated OEIS reporting requirements, along with other data consumption needs.

   Data is ingested into the Data Foundation from multiple Data Sources including asset systems, asset management systems, outage systems, vegetation management systems, and other internal and external systems, enabling one source of truth for the WMP Data Platform. Data Consumption includes regulatory reporting, internal reporting, efficacy studies, and advanced analytics. The Data Governance program ensures WMP data is governed by management oversight, policies and procedures, education, and tool standards. An overview of the WMP Data Platform is in Figure 1 shown below.

Figure 1: WMP Data Platform



b. SDG&E has successfully centralized its data from Oracle to SAP HANA. The data is organized using HANA Views, making it easily accessible. SAP HANA is utilized for producing SDG&E's Quarterly Data Reports and for responding to data requests, demonstrating the system's efficiency and reliability.

   In addition, we have plans for cloud migration as shown by the annual goals below. This initiative is focused on creating high-quality, reusable solutions that support better, faster decision-making across the board.

2026 Goals:

- Establish data migration patterns.
- Successfully migrate data sets, including grid hardening, assets, and PSPS/risk events.
- Implement data validation, integrity, and governance processes.

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2027 Goals:

- Execute data integration from the upgraded SAP S/4 HANA platform for ERP, transitioning from the legacy SAP ECC system.
- Implement data ingestion processes for the new Transmission SAP S/4 HANA system.
- Maintain enterprise data quality standards.

2028 Goals:

- Integrate and ingest critical data from all newly implemented systems across the organization.
- Establish data pipelines, security protocols, and ETL processes.
- Prioritize data quality and system compatibility while maintaining compliance standards.

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QUESTION 2

Regarding SDG&E's response to SDG&E-25U-08:

In response to SDGE-25U-08, SDG&E lists findings resulting from its 2024 IR inspections in Table 9-1. In 2024, thermography findings were created on the structures listed in the table below.

a. For each structure, indicate in the adjacent columns if the structure was observed by continuous monitoring technology as of April 1, 2024. For each structure that was monitored by any continuous monitoring technology (ARFS, PQ, or other) as of April 1, 2024, indicate whether any inspections were triggered as a result of the continuous monitoring technology, provide the type of inspection that was performed, and provide the date the inspection was performed.

Structure ID	Monitored By Advanced Radio Frequency Sensors (ARFS) April 1, 2024 (yes/no)	Monitored By Power Quality (PQ) Sensors April 1, 2024 (yes/no)	Monitored By Other Condition Monitoring Device/Technology as of April 1, 2024 (specify device or technology name)	Inspection(s) Triggered By Continuous Monitoring Technology (yes/no)	Triggered Inspection Date(s)
P192125					
P737707					
P192259					
P479712					
P192287					
P570385					
P11850					
P192306					
P474064					
P201281					
P279981					
P379031					
Z245659					
Z731331					

Structure ID	Monitored By Advanced Radio Frequency Sensors (ARFS) April 1, 2024 (yes/no)	Monitored By Power Quality (PQ) Sensors April 1, 2024 (yes/no)	Monitored By Other Condition Monitoring Device/Technology as of April 1, 2024 (specify device or technology name)	Inspection(s) Triggered By Continuous Monitoring Technology (yes/no)	Triggered Inspection Date(s)
P227944					
Z118778					
Z473088					
Z229374					
P839538					
P734600					
P933220					
P2135672414					
P313295					
P2157171985					
P174771					

RESPONSE 2

Structure ID	Monitored By Advanced Radio Frequency Sensors (ARFS) April 1, 2024 (yes/no)	Monitored By Power Quality (PQ) Sensors April 1, 2024 (yes/no)	Monitored By Other Condition Monitoring Device/Technology as of April 1, 2024 (specify device or technology name)	Inspection(s) Triggered By Continuous Monitoring Technology (yes/no)	Triggered Inspection Date(s)
P192125	No	Yes*	No	No	N/A
P737707	No	Yes*	No	No	N/A
P192259	No	Yes*	No	No	N/A
P479712	No	Yes*	No	No	N/A
P192287	No	Yes*	No	No	N/A
P570385	No	Yes*	No	No	N/A

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Structure ID	Monitored By Advanced Radio Frequency Sensors (ARFS) April 1, 2024 (yes/no)	Monitored By Power Quality (PQ) Sensors April 1, 2024 (yes/no)	Monitored By Other Condition Monitoring Device/Technology as of April 1, 2024 (specify device or technology name)	Inspection(s) Triggered By Continuous Monitoring Technology (yes/no)	Triggered Inspection Date(s)
P11850	No	Yes*	No	No	N/A
P192306	No	No	No	N/A	N/A
P474064	No	Yes*	No	No	N/A
P201281	No	Yes*	No	No	N/A
P279981	No	Yes*	No	No	N/A
P379031	No	Yes*	No	No	N/A
Z245659	No	Yes*	No	No	N/A
Z731331	No	Yes	No	No	N/A
P227944	No	Yes	No	No	N/A
Z118778	No	Yes*	No	No	N/A
Z473088	No	Yes*	No	No	N/A
Z229374	No	Yes*	No	No	N/A
P839538	No	Yes*	No	No	N/A
P734600	No	Yes*	No	No	N/A
P933220	No	No	No	N/A	N/A
P2135672414	No	Yes	No	No	N/A
P313295	No	Yes*	No	No	N/A
P2157171985	No	Yes*	No	No	N/A
P174771	No	Yes*	No	No	N/A

* Monitor is at the substation bank or bus level and does not distinguish between circuits

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QUESTION 3

Regarding Continuous Monitoring Technology Deployment:

a. Provide the total number of structures in SDG&E's HFTD/HFRA.

b. Provide the number of structures in SDG&E's HFTD/HRA continuously monitored by both PQ sensors and ARFS as of Jan 1, 2025.

c. Provide the number of structures in SDG&E's HFTD/HFRA continuously monitored by PQ sensors but not ARFS as of Jan 1, 2025.

d. Provide the number of structures in SDG&E's HFTD/HFRA continuously monitored by ARFS but not PQ sensors as of Jan 1, 2025.

e. List any other continuous monitoring sensors or technologies deployed by SDG&E that have been used or are planned for use to inform grid inspections and/or corrective grid work.

RESPONSE 3

a. 85,639 distribution structures in the HFTD

b. 6,932 distribution structures in the HFTD monitored by both PQ and ARFS

c. 59,445 distribution structures in the HFTD monitored by PQ but not ARFS

d. 7,649 distribution structures in the HFTD monitored by ARFS but not PQ

e. The EFD Program aims to utilize the PQ and ARFS monitoring technologies to detect and prevent significant equipment failures in order to address fire risk while also gaining the benefits of reducing customer forced outages. Sensors that are a part of this program have the potential to be used to inform grid inspections and/or corrective grid work. To accomplish this SDG&E is looking at the process changes needed to integrate the two processes that are currently separate. At this time the integration is still in its early stages.

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QUESTION 4

Regarding Inspections Trigged by Continuous Monitoring Technology:

a. Describe the process for initiating an inspection due to ARFS data. Include how assets are flagged for potential inspection, confirmed for inspection, the type of inspection is determined (i.e. patrol, infrared, detailed), and the inspection due date is determined.

i. Provide supporting documentation including written processes, guidance, and/or job aids related to initiating and performing inspections as a result of ARFS data.

b. Describe the process for initiating an inspection due to PQ sensor data. Include how assets are flagged for potential inspection, confirmed for inspection, the type of inspection is determined (i.e. patrol, infrared, detailed), and the inspection due date is determined.

i. Provide supporting documentation including written processes, guidance, and/or job aids related to initiating and performing inspections as a result of PQ sensor data.

c. Provide the total number of inspections initiated in 2024 as a result of ARFS data.

i. Provide the number of such inspections that resulted in level 1 findings.

ii. Provide the number of such inspections that resulted in level 2 findings.

d. Provide the total number of inspections initiated in 2024 as a result of PQ sensor data.

i. Provide the number of such inspections that resulted in level 1 findings.

ii. Provide the number of such inspections that resulted in level 2 findings.

RESPONSE 4

a. SDG&E receives a bi-monthly report from the manufacturer of ARFS equipment containing locations of interest with data showing RF energy dispersion signal groupings. After analyzing that data, SDG&E will issue a patrol for any locations with a concerning amount of disturbance energy. The patrol is performed by SDG&E's drone pilots, who capture high-resolution images from all angles of the location in question. Additionally, the drone pilot may capture infrared images of the location in question. Images are reviewed, then the asset is field verified by an engineer and a qualified electrical worker to determine severity and remediation work needed. Drone inspections are typically completed within two weeks of issuance, depending on resource availability. Currently there is no formal

documentation of this process as this is still in the R&D space and SDG&E is continually improving and altering the process.

b. SDG&E received a weekly report of all new precursor events captured by PQ sensors. This data is then reviewed by engineers to determine severity and if a known location can be identified. For overhead-related assets, the same process described in item 4a is followed. For underground-related assets, the engineer will issue an underground patrol request to be completed by a qualified electrical worker. Underground patrols involve a visual inspection as well as an infrared camera to locate hot connections. Depending on findings, remediation work is determined by the field personnel. Underground patrols are requested to be completed within three days. Currently there is no formal documentation of this process as this is still in the R&D space and SDG&E is continually improving and altering the process.

c. 40 inspections initiated in 2024 as a result of ARFS data
    i. Due to the focus of the EFD program not being compliance, SDG&E currently does not track level 1 findings.
    ii. Due to the focus of the EFD program not being compliance, SDG&E currently does not track level 2 findings.

d. 20 inspections initiated in 2024 as a result of PQ data
    i. Due to the focus of the EFD program not being compliance, SDG&E currently does not track level 1 findings.
    ii. Due to the focus of the EFD program not being compliance, SDG&E currently does not track level 2 findings.

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QUESTION 5

Regarding Transmission Inspection QA/QC

a. Provide a copy of SDG&E document TCM 807, Section 5.2: Condition Assessment, Version 8G.

RESPONSE 5

See attached document titled "TCM807 Version 8G Section 5.2-Condition Assessment.pdf."

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QUESTION 6

Regarding Weather Station Maintenance and Calibration in section 10.5.5 of the Wildfire Mitigation Plan Guidelines on page 136, the utility companies must provide an "acceptable percentage of weather station outages as defined by the electric corporation." Page 252 of the 2026-2028 Base SDG&E WMP Submission states, "although SDG&E does not have a set acceptable outage percentage, the stations have consistently maintained a 99 percent communication rate."

a. Provide an acceptable percentage of weather station outages in which SDG&E will still be able to operate without an increase in risk or impact to the PSPS decision making as outlined in the Wildfire Mitigation Plan Guidelines.

> i. If SDG&E cannot provide what percentage of weather station outages is defined as acceptable, provide an explanation why it cannot.

RESPONSE 6

SDGE weather stations have consistently maintained a 99 percent communication rate. SDG&E does not have a set acceptable outage percentage because it is nearly impossible to ascertain an acceptable percentage. All weather stations operate independently of distribution circuits and are powered by batteries that are recharged by solar panels. Each high-risk circuit has a weather station associated with that circuit. However, some circuits are very long and have multiple weather stations associated with that circuit. Additionally, not all areas of the HFTD are affected the same way during Santa Ana wind events. Thus, picking weather stations that are inconsequential because other circuit associated stations that could be used as a proxy is event and weather dependent and cannot be answered in a holistic manner.

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QUESTION 7

Regarding Vegetation Inspections and Pole Clearing Targets:

Page 104 of the Wildfire Mitigation Plan Guidelines states "Targets for inspection activities (programs) of overhead electrical assets must use circuit miles as the unit."

a. Provide all quarterly and year-end targets from Table 9-2 for the following programs in circuit miles:

i. Detailed Inspection (WMP.494)

ii. Off-Cycle Patrol (WMP.508)

RESPONSE 7

Targets by circuit mile are provided below. Historically, Detailed Inspections have been reported by inspections complete, and Off-Cycle Patrol by Vegetation Management Area (VMA) complete. While able to pivot and report by circuit line mile, this unit of measure provides a less granular understanding of the work completed. SDG&E will comply with updating to the new unit requirement in the 2026-2028 WMP and associated QDR data tables when OEIS allows a mechanism to do so.

Activity	Tracking ID	Target Unit	Cumulative Quarterly Target 2026_Q1	Cumulative Quarterly Target 2026_Q2	Cumulative Quarterly Target 2026_Q3	Cumulative Quarterly Target 2026_Q4	Cumulative Quarterly Target 2027_Q1	Cumulative Quarterly Target 2027_Q2	Cumulative Quarterly Target2027_Q3	Cumulative Quarterly Target 2027_Q4	Cumulative Quarterly Target 2028_Q1	Cumulative Quarterly Target 2028_Q2	Cumulative Quarterly Target 2028_Q3	Cumulative Quarterly Target 2028_Q4
Detailed Inspection	WMP.494	Circuit Miles	1215	2430	3645	4860	1215	2430	3645	4860	1215	2430	3645	4860
Off-Cycle Patrol	WMP.508	Circuit Miles	1620	3240	4860	4860	1620	3240	4860	4860	1620	3240	4860	4860

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QUESTION 8

Regarding Vegetation Management QA/QC Pass Rate Targets:

On page 224 of its 2026-2028 Base WMP, SDG&E targets a 90% pass rate for its "Quality assurance/quality control of Vegetation Management" (WMP.505) initiative. On page 290 of its 2023-2025 Base WMP, SDG&E targets a pass rate of 95% for all three of its QA/QC audits. SDG&E states that in 2022 it achieved a pass rate of 94% for pre-inspection, 99% for tree trimming, and 97% for pole clearing activities.

a. Explain why SDG&E has lowered its pass rate target for QA/QC in its 2026-2028 Base WMP.

b. Describe any obstacles to SDG&E increasing the QA/QC pass rate target each year from 2026-2028 (e.g., need for additional training, longer time to complete vegetation management work, human error, etc.).

RESPONSE 8

a. After further review of historical QA/QC findings and pass rates, SDG&E determined that a 90% pass rate is a reasonable and representative target and threshold for work quality performance of the vegetation management contractors.

b. SDG&E anticipates no obstacles to potentially increasing its QA/QC pass rate target in the future.

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QUESTION 9

Regarding the Granularity of Priority Levels in Past Due Vegetation Management Work Orders:

On page 228 of its 2026-2028 Base WMP, SDG&E categorizes past due work orders by "Low Priority" and "High Priority." On page 227 of its 2026-2028 WMP, SDG&E sets work completion timelines for routine pruning and removal of "60 to 120 days following inspections," and "Memo" work order timelines of "the same day the condition is observed, the next day, or within 30 days."

a. Complete the table below, in the format of Table 9-8, to disaggregate low and high priority past due pruning and removal work into the following priority levels: 60-120 days, within 30 days, next day, same day.

Priority Level	0-30 Days	31-90 Days	91-180 Days	181+ Days
60-120 Days				
Within 30 Days				
Next Day				
Same Day				

RESPONSE 9

Priority Level	0-30 Days	31-90 Days	91-180 Days	181+ Days
60-120 Days	335	242	4	1
Within 30 Days	40	12	2	0
Next Day	0	0	0	0
Same Day	0	0	0	0

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QUESTION 10

Regarding SDG&E's Pole Clearing Program:

On page 213 of its 2026-2028 Base WMP, SDG&E states, "The determination to stop clearing poles with exempt equipment was made due to the evaluation of cost efficiencies, environmental impacts, impacts to customers, and the general absence of ignition data associated with exempt equipment."

a. Did SDG&E consult with other electrical corporations before deciding to stop clearing vegetation around poles with Public Resource Code (PRC) 4292 exempt equipment?

i. List all electrical corporations that SDG&E consulted in making this decision.

ii. Provide summaries of any discussions with these electrical corporations that informed SDG&E's evaluation and decision-making process.

iii. Did SDG&E request ignition data associate with PRC 4292 exempt equipment from other electrical corporations?

1. If ignition data was requested, provide a summary of the ignition data received from each electrical corporation SDG&E consulted.

iv. If SDG&E did not consult with other electrical corporations, explain why.

b. Provide the ignition data that was used to support SDG&E's claim that there is a general absence of ignition data associated with PRC 4292 exempt equipment.

i. What time period did the ignition data cover?

ii. How many ignitions, if any, were identified as being associated with PRC 4292 exempt equipment?

c. Were customer opinions solicited or considered when evaluating the customer impacts of clearing vegetation around poles with PRC 4292 exempt equipment?

i. If so, provide a summary of the customer feedback received regarding this activity.

ii. If customer input was not solicited, explain the basis of SDG&E's determination that clearing vegetation around PRC 4292 exempt equipment has customer impacts.

d. Were environmental experts or formal assessments used in evaluating the environmental impacts of clearing vegetation around poles with PRC 4292 exempt equipment?

i. If so, provide a summary of the findings from those environmental assessments regarding this activity.

ii. If environmental experts or assessments were not used, explain SDG&E's decision-making process for determining that clearing around PRC 4292 exempt poles has environmental impacts.

RESPONSE 10

a. SDG&E did not directly consult with other electrical corporations before deciding to stop clearing vegetation around poles with exempt PRC 4292 equipment.

   i. NA

   ii. NA

   iii. NA

      1. NA

   iv. SDG&E did not consult with other electrical corporations on this decision based on the differences in the geography, topography and vegetation types between the service territories, and the internal considerations specific to SDG&E (e.g., cost efficiencies, no known prior ignitions associated with exempt hardware, additional environmental review). A primary driver for SDG&E stopping the clearing of vegetation around poles is based on Cal Fire's classification of the equipment as exempt which was determined through field testing.

b. As required by the CPUC, utilities must report ignitions involving their equipment that meet the criteria per D.14-02-015. Please see https://www.cpuc.ca.gov/industries-and-topics/wildfires for the ignition data related to SDG&E.

   i. The time-period the data ignition covers is 2014-2024.

   ii. There were no ignitions that were directly associated with PRC 4292 exempt equipment.

c. Customers were not separately and specifically solicited when SDG&E evaluated the impacts of clearing vegetation around poles with PRC 4292 exempt equipment. However, customer impacts are derived through historical, anecdotal interactions with Vegetation Management, and are described further below in response to Question ii.

   i. NA

ii. Customers can be impacted by vegetation clearing for PRC 4292 in multiple ways. 1) Customers often must provide physical access to a property for the contractor to perform pole clearing; 2) Pole clearing often requires two or more visits annually to a property for mechanical, herbicide, and/or re-clear activities; 3) Post-clearing audit activities may necessitate additional property visits by the contractor; 4) Pole clearing requires removal of vegetation down to bare mineral soil within a 10 foot radius, and the removal of tree branches within the radius up to the height of the conductors. Ground clearing could promote soil erosion at the base of the pole and would require the removal of healthy landscaping maintained by the customer. These impacts are a necessary result of pole clearing where required by law, however, they can be seen as an unnecessary burden to customers where it's not required by law.

d. Yes. All poles that receive pole brushing for PRC 4292 are annually screened for environmental and cultural review.

   i. Please see attached document titled, "OEIS-2025-05_Q10(d)(i)_Redacted.pdf". SDG&E is providing an example of an annual environmental release for poles that are scheduled for pole brushing. SDG&E is providing a redacted version that contains personal names and phone numbers that are not directly relevant to the question.

   ii. N/A

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QUESTION 11

Regarding SDG&E's Pole Clearing Target (WMP.512):

On page 208 of its 2026-2028 Base WMP, SDG&E sets annual targets in 2026, 2027, and 2028 of 22,000 poles. On page 257 of its 2023-2025 Base WMP, SDG&E set annual targets for 2023, 2024, and 2025 of 33,010 poles. The delta between SDG&E's targets in the 2026-2028 Base WMP and SDG&E's 2023-2025 Base WMP is 11,010 poles. On page 211 of its 2026-2028 Base WMP, SDG&E states that "Since the 2023-2025 Base WMP, SDG&E has ceased performing pole clearing on poles with exempt equipment, such as hotline clamps (HLC)."

a. Of the 11,010 poles that SDG&E no longer plans to clear, provide the number of those poles that hold exempt equipment and do not hold any non-exempt equipment.

b. If some of the 11,010 poles that SDG&E no longer plans to clear hold non-exempt equipment, describe the other operational decisions that led to SDG&E's plan to no longer clear these poles.

c. Provide details of any risk reduction measures that will compensate for the reduced volume of pole clearing work.

RESPONSE 11

a. All 11,010 of the poles SDG&E no longer plans to clear hold exempt equipment.

b. N/A. See response to a. above.

c. The risk reduction measures that compensate for the reduced volume of pole clearing work include locations where non-exempt hardware is replaced by exempt hardware.

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QUESTION 12

Regarding SDG&E's Early Fault Detection Third Party Evaluation:

In its response to the Early Fault Detection Implementation (SDGE-25U-05) ACI on page 32 of Appendix D in SDG&E's 2026-2028 WMP, SDG&E stated: "A third party was engaged to evaluate its effectiveness, and based on their analysis, several changes were implemented to accommodate system tracing and ensure the accurate coverage of the installed devices."

a. Provide a copy of this third-party evaluation and analysis.

b. Provide a summary of the types of issues missed that resulted in the ten false negatives.

RESPONSE 12

A. See attached PDF document titled "EFD Study Document.pdf" for the early fault detection third-party evaluation and analysis.

b. SDGE found the below 10 false negative with EFD devices.

Issue#	Outage ID	Circuit	Cause
1	220223E253449	211	Wire slap/pole down/wire down (severe weather)
2	230601E286128	350	Pole - contact/damage/broke/rotted/on fire
3	230316E280845	445	Arrester failure
4	230113E276229	448	Crossarm failure/contact
5	230111E276108	448	Hardware failure
6	230731E290189	448	Transformer (station) failure/contact
7	230607E286603	524	OH connector failure (jumper/splice/squeeze-on)
8	240613E313709	211	Pole - contact/damage/broke/rotted/on fire
9	240319E307337	350	Transformer (station) failure/contact
10	240109E301776	217	Cutout failure

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QUESTION 13

Regarding SDG&E's Risk Reduction in OEIS Table 8-1:

Energy Safety's understanding of the expected risk reduction for the activities is Section 8 Grid Design & System Hardening and Grid Operations reported in OEIS Table 8-1 of SDG&E's 2026-2028 WMP is currently calculated at a segment/circuit level in which work is being completed. However, the expected risk reduction to be reported in Table 8-1 should reflect the reduction in SDG&E's overall wildfire and PSPS risk – in other words, the impact of each activity on the enterprise-wide risk.

a. Is the expected risk reduction for activities reported in OEIS Table 8-1 calculated at a segment/circuit level in which work is being completed? If not, explain how SDG&E calculated the expected risk reduction values in Table 8-1.

b. Provide the updated risk reduction percentages for each activity reported in OEIS Table 8-1 for the years 2026, 2027, and 2028, calculated at the overall enterprise level.

c. Provide the updated expected risk reduction percentages for each activity reported in OEIS Table 6-3 using the same update to the calculation as Table 8-1 in part (b).

RESPONSE 13

a) The expected risk reduction for activities reported in OEIS Table 8-1 are calculated at a segment level on which activity is going to be completed in the WMP years 2026-2028.

b) Please refer to the attached spreadsheet titled "2026_OEIS Guideline Tables.xlsx" for updated table 8-1 risk reduction.

c) Please refer to the attached spreadsheet titled "2026_OEIS Guideline Tables.xlsx" for updated table 6-3 risk reduction.

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QUESTION 14

Regarding OEIS Table 6-4:

a. Provide an updated version of OEIS Table 6-4 (SDG&E's 2026-2028 Base WMP, p. 116; and Appendix F, pp. 58-73) via Excel with the following additional columns for each circuit/circuit segment:

i. Total Circuit Mileage Undergrounded as of EOY 2025

ii. Total Circuit Mileage of Covered Conductor as of EOY 2025

iii. Total Circuit Mileage Planned for Undergrounding (for 2026, 2027, and 2028, respectively)

iv. Total Circuit Mileage Planned for Covered Conductor (for 2026, 2027, and 2028, respectively)

RESPONSE 14

Please refer to the attached spreadsheet titled "2026_OEIS Guideline Table 6-4.xlsx" for the updated OEIS 6-4 Table with the additional requested columns included.

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QUESTION 15

Regarding OEIS Table 6-1:

a. Provide the total overall utility risk value used to calculate the percentage of overall utility risk percentages shown in OEIS Table 6-1 (SDG&E's 2026-2028 Base WMP, p. 84 Appendix F, pp. 12-55).

b. Provide an updated version of OEIS Table 6-1 via Excel with the following additional columns for each circuit/circuit segment:

i. Safety Risk Score Component of Wildfire Risk Score

ii. Reliability Risk Score Component of Wildfire Risk Score

iii. Financial Risk Score Component of Wildfire Risk Score

iv. PSPS Risk Score

v. PEDS Risk Score

RESPONSE 15

a) The percentage of overall utility risk is calculated from the total overall utility risk across the full territory, which includes circuit-segments that do not have overhead in the HFTD territory. These were not included in the OEIS 6-1 Table, since SDG&E's risk prioritization is focused primarily in the HFTD territory. The total overall utility risk value calculated from the full list of circuit-segments in the territory is $3,032,480,966.

b) Please refer to the attached spreadsheet titled "2026_OEIS Guideline Table 6-1.xlsx" for the updated OEIS 6-1 Table with the additional requested columns included.

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QUESTION 16

Regarding OEIS Table 6-3:

a. Provide a detailed explanation of the analysis used to calculate the activity effectiveness for each activity in OEIS Table 6-3 (SDG&E's 2026-2028 Base WMP, pp. 111-112). Include copies of any relevant workpapers and supporting documentation used for this analysis.

b. Provide a detailed explanation of the analysis used to calculate expected % risk reduction for each activity in OEIS Table 6-3. Include copies of any relevant workpapers (i.e. the "CCC Risk & Cost Benefit" Excel sheet) and supporting documentation used for this analysis.

RESPONSE 16

a) Please see attached PDF titled "SDG&E Efficacy Study Documentation.pdf" for effectiveness calculation explanation.

b) Please refer to Appendix G of WMP 2026-2028 for detail % risk reduction calculation, which is available on SDG&E's 2026-2028 WMP website at: https://www.sdge.com/2026-2028-wildfire-mitigation-plan.

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QUESTION 17

Regarding SDG&E's Mitigation Initiative Prioritization On page 100 of SDG&E's 2026-2028 Base WMP, in Figure 6-2, SDG&E depicts a flowchart showing its high-level mitigation prioritization.

a. As part of the "develop draft hardening scope" portion, SDG&E includes a bullet point to "Optimize survey." Describe what is included in this step of prioritization and provide any supporting documentation and procedures outlining this step.

b. SDG&E includes a step to "prioritize Wildfire Risk reduction benefit" as part of developing its draft hardening scope. Describe what factors and thresholds are used as part SDG&E's measuring and determining reduction benefit and provide any supporting documentation and procedures.

c. SDG&E includes a step to determine whether "hardening scoping plan ready for release." Describe what instances would lead to a "no" at this step and therefore run through development of a draft hardening scope and review again.

RESPONSE 17

See updated Figure 6-2: High-Level Mitigation Prioritization to Reduce Wildfire and PSPS Risk as submitted in the WMP substantive and non-substantive errata, which is available on the OEIS docket as well as SDG&E's website at https://www.sdge.com/2026-2028-wildfire-mitigation-plan.

a. "Optimize survey" was removed from the figure as it is not a primary consideration in this step of prioritization. Rather, SDG&E evaluates the advantages of "bundling" the hardening of upstream feeder segments to optimize PSPS risk reduction and leverage economies of scale by reducing permitting and mobilization costs

b. "Prioritize Wildfire Risk reduction benefit" was modified to be "Analyze Wildfire, PSPS, and PEDS risk reduction benefit." The primary drivers for selecting a circuit-segment mitigation project are wildfire risk (a direct output from WiNGS-Planning) and the PSPS de-energization history and risk of the circuit. The PSPS review considers both upstream and downstream topography, wind speeds, and recommended mitigations to optimize the overall mitigation plan for the circuit.

   The WiNGS-Planning model is used to calculate wildfire, PSPS, and PEDS risk used in the aggregated overall wildfire and overall outage program risk components. The model estimates the baseline risk and quantifies the expected risk reduction for both Combined Covered Conductor and Strategic Undergrounding for each feeder segment. For more

details around prioritization analysis and ranking of circuit-segments, see Section 6.1.2 Risk-Informed Prioritization.

c. Subject matter expertise review may identify projects or components of projects that are infeasible. For example, covered conductor installation is not permitted above certain elevations due to the negative impacts of ice loading. Another example may include property ownership, land access, or environmental constraints that require significant revisions to the routing of a proposed SUG project.

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END OF REQUEST