OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-04
SDG&E RESPONSE

Date Received: 05-16-2025
Date Submitted: 05-22-2025

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.

Date Received: 05-16-2025
Date Submitted: 05-22-2025

III. RESPONSES

QUESTION 1

Regarding reduction in 2025 targets/expenditure for Lightning Arrestor Removal/Replacement (WMP.550) and Avian Protection (WMP.972)

In its Petition to Amend, SDG&E requests to reduce its 2025 targets for Lightning Arrestor Removal/Replacement (WMP.550) from 1,848 to 90 and for Avian Protection (WMP.972) from 200 to 95 poles.[1]

SDG&E revised its projected 2025 capital expenditure for Lightning Arrestor Removal/Replacement (WMP.550) from $3.483 million to $0, and for Avian Protection (WMP.972) from $1.512 million to $0.[2]

In its General Rate Case (GRC) decision, the California Public Utilities Commission (CPUC) adopted a capital forecast of $3.2 million for SDG&E's lightning arrestor replacement and avian protection programs.[3,4] The CPUC adopted forecast is $0.357 million lower than SDG&E's proposal in the GRC application.

a. Explain why its projected expenditure in its Petition to Amend for the Lightning Arrestor Removal/Replacement (WMP.550) and Avian Protection (WMP.972) initiatives are $0 even though the CPUC adopted a capital forecast of $3.2 million.

b. Provide the unit cost of lightning arrestor removal and replacement in High Fire Threat district (HFTD) Tier 2 and Tier 3 and the number of lightning arrestors SDG&E plans to remove/replace in Tier 2 and Tier 3, respectively.
   i. If the total annual cost is higher than that adopted by the CPUC, provide justification for the higher unit cost.

c. Explain why SDG&E's 2025 Avian Protection (WMP.972) target is reduced even though the category is uncontested in the GRC decision.

RESPONSE 1

As discussed in the Petition to Amend, SDG&E must manage expenditures for the entire portfolio of wildfire mitigation initiatives and across all four years of the TY 2024 GRC cycle, 2024-2027.

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[1] San Diego Gas & Electric Company, San Diego Gas & Electric 2025 Petition to Amend, Published April 10, 2025, page 3; URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58234&shareable=true).
[2] San Diego Gas & Electric Company, San Diego Gas & Electric 2025 Petition to Amend, Published April 10, 2025, Attachment A, page 2; URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58234&shareable=true).
[3] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, pages 483-485, D. 24-12-074, Published December 23, 2024, URL: (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf).
[4] Public Advocates Office, Opening Brief of the Public Advocates Office, page 195, A. 22-05-015, Published August 14, 2023, URL: (https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M517/K407/517407314.PDF.

As stated on page 5 of the Petition to Amend, "To stay within the authorized revenue requirement and because SDG&E exceeded its capital expenditures in 2024, it is necessary to reduce SDG&E's wildfire mitigation spending for 2025, 2026, and 2027." For this reason, SDG&E elected to reduce program scope for some of its uncontested programs, thereby reducing program spend and overall portfolio spend, for the initiatives in question.

SDG&E carefully considered every initiative in its WMP portfolio with specific focus on the impacts on wildfire and PSPS risk reduction to determine the scope and scale of program reductions.

Regarding target changes requested for 2024, the Commission did not issue a final decision in the GRC until the last week of the year. In the absence of that final decision, SDG&E used reasonable judgement at the time to reduce programs in alignment with its proposed Settlement Agreement with CalPA, both to adhere to the terms of that proposed agreement and in an effort to find cost savings and efficiencies while maintaining an appropriate level of risk reduction. For example, SDG&E continued implementation of its grid hardening initiatives, mandatory asset and vegetation management inspections, and maintained situational awareness and emergency preparedness. As a result, SDG&E elected to reduce the uncontested programs that would not achieve as much risk reduction, and further explanations for each are provided below.

Regarding target and expenditure changes for 2025, SDG&E first considered how to implement the explicitly authorized undergrounding and covered conductor initiatives, and then how to make further adjustments to portfolio level spend while not introducing or increasing additional wildfire and PSPS risk. The resulting portfolio includes reductions to uncontested programs in question, and further explanations are provided below and in response to other questions.

a. SDG&E elected to reduce program budgets for Lightning Arrestor Removal/Replacement (WMP.550) and Avian Protection (WMP.972) to $0 and reallocate those budgets to wildfire mitigation activities that are expected to reduce more wildfire risk. As discussed in its Change Order submitted January 27, 2025 and rejected by Energy Safety and again in the Petition to Amend, SDG&E intends to continue replacing and installing these assets alongside covered conductor deployment. For this reason, the program targets have not been completely reduced to zero but instead are aligned with the intended covered conductor mileage planned for 2025. SDG&E also notes that the GRC Decision adopted TURN's recommendation for cost per unit of covered conductor at $800,000/mile, which was a significant reduction from SDG&E's request and reduced available funds for associated asset replacements such as structures, lightning arrestors, fuses, avian protection, etc. Reallocating the costs in the manner described in the authorized spend for lightning arrestors and avian protection to Covered Conductor (WMP.455) is reasonable because it will continue to replace those assets as it deploys covered conductor and to increase its Covered Conductor program budget to account for a more realistic and reasonable unit cost.

b. SDG&E is not calculating a projected cost per unit for lightning arrestors and avian protection as those replacements are included in the cost/mile and projected spend for Covered Conductor. The targeted units for lightning arrestors and avian protection were forecasted based on estimating a number of widgets needed for an average number of structures per circuit mile. This methodology yields 90 lightning arrestors and 95 poles with avian protection, respectively. Applying the percentage of planned miles for covered conductor deployment in Tier 2 and Tier 3 in 2025, SDG&E estimates that it will install the following:

	Tier 2	Tier 3
Lightning arrestors	54	36
Avian protection	57	38

c. See response to part a. above.

QUESTION 2

Regarding reduction in 2025 targets/expenditure for Detailed Vegetation Inspections (WMP.494)

In its Petition to Amend, SDG&E seeks to reduce its 2025 Detailed Vegetation Inspections (WMP.494) target from 485,400 inspections to 255,000 inspections in the HFTD.[5] Correspondingly, SDG&E requested to reduce its HFTD expenditure from $32.639 million to $30.854 million.[6]

For the category of Vegetation Management and Inspection – Tree Trimming only, the GRC decision authorized $26.612 million for the work in the HFTD, which is $0.62 million lower than SDG&E's proposal ($27.232 million) due to lower unit ($97 in Tier 2 and Tier 3) cost adopted.[7] CPUC also authorized $15.269 million in the non-HFTD for the 2024 test year, which is consistent with SDG&E's proposal.[8] For the category of Vegetation Management and Inspection, the GRC decision authorized $ 12.481 million, which is $3.552 million less than SDG&E's request ($ 16.033 million, post-Update Testimony forecast).[9]

The GRC decision did not discuss the number of inspections for this category.[10]

> a. Provide the number of inspections SDG&E planned in its GRC application that formed the basis for the $41.881 million CPUC authorization in both HFTD and non-HFTD.[11] Include a reference (from its GRC filing, include the URL and page number) for the number of inspections.

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[5] San Diego Gas & Electric Company, San Diego Gas & Electric 2025 Petition to Amend, Published April 10, 2025, page 10; URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58234&shareable=true).

[6] San Diego Gas & Electric Company, San Diego Gas & Electric 2025 Petition to Amend, Published April 10, 2025, Attachment A, page 4; URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58234&shareable=true).

[7] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, pages 491-493, D. 24-12-074, Published December 23, 2024, URL:(https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf).

[8] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, pages 491-493, D. 24-12-074, Published December 23, 2024, URL:(https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf).

[9] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, page 488, D. 24-12-074, Published December 23, 2024, URL:(https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf).

[10] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, pages 491-493, D. 24-12-074, Published December 23, 2024, URL:(https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf) .

[11] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, pages 491-493, D. 24-12-074, Published December 23, 2024, URL:(https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf).

i. If the number of inspections SDG&E plans to conduct in its GRC application is not consistent with the target changes in the Petition to Amend, provide justification for the difference in the scope of work.

b. Explain why inspections are only performed in the HFTD when there is an authorized non-HFTD forecast.

c. Provide unit costs for Detailed Vegetation Inspections (WMP.494) in the HFTD and non-HFTD.
i. If SDG&E's unit cost calculates to a higher total cost than $26.612 million (HFTD) and $15.269 million (non-HFTD) authorized by the CPUC, provide justification for the higher unit costs.

RESPONSE 2

a. In its 2024 GRC, SDG&E anticipated performing 491,822 tree inspections throughout its service territory, with 149,228 trees in Tier 2, 123,772 trees in Tier 3, and 218,822 trees in the non-HFTD. Tree Trimming's number of trees inspected are discussed in 1WM005.001 (pages 106-107) in 2024 GRC Application Exhibit SDG&E-13-WP-2R-E: SDGE-13-WP-2R-E_Jonathan T Woldemariam_EOWM.pdf.

b. SDG&E clarifies that there is no change to its planned vegetation management activities across its entire service territory and it will continue to perform vegetation management inspections and follow up activities throughout its service territory. Rather, to remain consistent with other wildfire mitigation activities that address wildfire risk in the most consequential areas, SDG&E elected to limit the WMP scope of vegetation management activities to the HFTD. This approach is consistent with the approach taken in the GRC Decision authorizing the use of the Vegetation Management Balancing Account (VMBA), and authorizing vegetation management HFTD costs distinctly from non-HFTD costs. In addition, it develops more transparency for vegetation management related activities and costs in the HFTD and not have the data comingled with the non-HFTD work.

c. SDG&E's current projected unit cost for vegetation management inspections and tree trimming activities in the HFTD is ~$121/tree, which totals $30.854 million for 255,000 trees. The unit cost reflected in the GRC Decision for vegetation management inspections and tree trimming activities in the HFTD is ~$97.50/tree.

   The projected cost of $30.854 million is higher than the CPUC authorized HFTD costs of $26.612 million for various reasons. SDG&E developed its 2024 GRC in the latter half of 2021 and early 2022, and at the time forecasted spend for the category of Vegetation Management and Inspection – Tree Trimming only using a base-year forecast that assumed 2021 levels of work and spend and simply escalated to 2024 dollars. The base year forecast was flawed in that it fails to reflect current market conditions and competitive solicitations for contracted workforce performing these activities. There are significant market increases due to union wages and benefits guided by Senate Bill 247, overhead expenses, equipment costs, and contractor liability insurance that influence SDG&E's current cost forecasts. SDG&E continues to manage a safe and compliant vegetation management program to prevent wildfires and tree-caused outages. SDG&E will continue to seek opportunities to reduce program costs through undergrounding projects, leveraging technology and risk modeling, and removing fast-growing tree species to modify the tree inventory near overhead electrical lines.

Date Received: 05-16-2025
Date Submitted: 05-22-2025

QUESTION 3

Regarding reduction in 2025 targets/expenditure for Pole Clearing (WMP.512)
In its Petition to Amend, SDG&E seeks to reduce its 2025 Pole Clearing (WMP.512) target from 33,010 poles to 22,000 poles.[12] SDG&E requests to reduce its operations expenditure for Pole Clearing (WMP.512) from $8.13 million to $6.427 million.[13]

The GRC decision adopts a 2024 forecast of $5.369 million for Pole Brushing/Clearing with the same number of poles SDG&E stated in its GRC application.[14] CPUC's authorization is $2.524 million less than SDG&E's request ($7.893 million) in its GRC application.[15]

a. From its GRC application, provide the number of poles SDG&E planned to clear that formed the basis for the $7.893 million requested by SDG&E.[16] Include a reference (from its GRC filing, include the URL and page number) for the number of poles.

b. Provide the unit cost for Pole Clearing (WMP.512) in HFTD Tier 2 and Tier 3, and the number of poles SDG&E plans to brush in each tier.

i. If the unit cost amounts to a total cost higher than the $5.369 million authorized by the CPUC, provide justification for the higher unit cost.

c. Provide justification for reduced target request given that the GRC decision does not discuss the scope of pole brushing/clearing. The acceptance of Cal Advocate's recommendation implicitly endorses workloads per year; the workloads forecast by SDGE and recommended by Cal Advocates are equal – it's only the unit cost that differs.[17]

i. If the number of poles SDG&E plans to clear is not consistent with the number provided in its GRC application, provide justification for the difference in the scope of work.

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[12] San Diego Gas & Electric Company, San Diego Gas & Electric 2025 Petition to Amend, Published April 10, 2025, page 10; URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58234&shareable=true).

[13] San Diego Gas & Electric Company, San Diego Gas & Electric 2025 Petition to Amend, Published April 10, 2025, Attachment A, page 4; URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58234&shareable=true).

[14] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, pages 489-490, D. 24-12-074, Published December 23, 2024, URL: (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf).

[15] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, pages 489-490, D. 24-12-074, Published December 23, 2024, URL: (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf).

[16] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, pages 489-490, D. 24-12-074, Published December 23, 2024, URL: (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf).

[17] California Public Advocates Office, Opening Brief of the Public Advocate Office, Published August 14, 2023, page 190; URL:(https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M517/K407/517407314.PDF)

RESPONSE 3

a. In its 2024 GRC, SDG&E anticipated performing pole clearing activities around 34,000 poles.[18] Pole Brushing's number of poles brushed are discussed in 1WM005.000 (pages 93-94) in 2024 GRC Application Exhibit SDG&E-13-WP-2R-E: SDGE-13-WP-2R-E_Jonathan T Woldemariam_EOWM.pdf.

b. SDG&E's current projected unit cost for pole clearing activities is ~$292/pole, which totals $6.427 million for 22,000 poles. The unit cost reflected in the GRC Decision for pole clearing activities is ~$158/pole, which totals $5.369 million for 34,000 poles. SDG&E's requested unit cost in its GRC request is ~$232/pole, which totals the requested $7.893 million for 34,000 poles. SDG&E's current cost projection is higher than both its requested costs and CPUC authorized costs for reasons described in response to question 2c. above.

c. As discussed in its Petition to Amend, consistent with the GRC Decision authorizing $2.54 million less than requested, and in an effort to align program budget with authorized spend, SDG&E elected to reduce the scope of this program, thereby reducing total program costs, by eliminating pole clearing activities around poles with exempt equipment that are not required by Public Resources Code (PRC) § 4292. Although SDG&E's current projected spend of $6.427 million remains $1.058 million higher than authorized, the corresponding change in program scope demonstrates SDG&E's commitment to performing mandatory pole clearing activities in compliance with PRC § 4292 with the ultimate goal of reducing wildfire risk. As stated previously, SDG&E continues to manage a safe and compliant vegetation management program to prevent both likelihood and consequence of ignition. SDG&E will continue to seek opportunities to reduce program costs through undergrounding projects that will eliminate the need for these activities where overhead lines are undergrounded.

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[18] Page 93 of O&M workpapers; https://www.sdge.com/sites/default/files/regulatory/SDG%26E-13-WP-2R-E%20Jonathan%20T%20Woldemariam%20-%20Wildfire%20Mitigation%20and%20Vegetation%20Management.pdf

QUESTION 4

Regarding reduction in 2024 targets for Fuels Management (WMP.497)
In its Petition to Amend, SDG&E seeks to reduce its 2024 Fuel Management (WMP.497) target from 500 poles to 150 poles.[19]

The GRC decision adopts a 2024 forecast of $5.246 million with the same number of structures SDG&E stated in its GRC application. CPUC's authorization is $1.028 million less than SDG&E's request ($6.274 million) in its GRC application.

a. From SDG&E's GRC application, provide the number of structures SDG&E planned to clear in 2024 that formed the basis for the $6.274 million forecast proposed by the SDG&E.[20] SDG&E must include a reference to a GRC filing (including URL and page number) for the number of structures.

b. Provide the unit cost for Fuels Management (WMP.497) in HFTD Tier 2 and Tier 3, , and the number of structures SDG&E cleared in each Tier from its GRC application.

   i. If the unit cost amounts to a total annual cost higher than the $ million authorized by the CPUC, provide justification for the higher unit cost.

c. Provide justification for reducing its 2024 target given that the GRC decision did not reduce the scope of the program.

   i. If the request to reduce its target to 150 poles for 2024 is not consistent with the number provided in the GRC application, provide justification to the difference in the scope of work.

RESPONSE 4

a. In its 2024 GRC, SDG&E anticipated performing fuels management activities around 550 poles. The total cost for Fuels Management includes the activities of structure clearing, fuels grants program, and fuel abatement within easements. SDG&E's unit target for Fuels Management pertains only to the activity of structure clearing (550 poles). Fuels Management's number of structures cleared are discussed in 1WM005.000 (pages 91-92) in 2024 GRC Application Exhibit SDG&E-13-WP-2R-E: SDGE-13-WP-2R-E_Jonathan T Woldemariam_EOWM.pdf.

b. Embedded in the GRC Decision and the GRC request for Fuels Management are the costs for structure clearing, fuels grants program and fuel abatement program. When separating the cost of these programs by activity, the relative portion for the structure clearing (unit cost) is

[19] San Diego Gas & Electric Company, San Diego Gas & Electric 2025 Petition to Amend, Published April 10, 2025, page 7; URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58234&shareable=true).
[20] San Diego Gas & Electric Company, San Diego Gas & Electric 2025 Petition to Amend, Published April 10, 2025, page 7; URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58234&shareable=true).

determined. In 2024, the total cost for structure clearing was $1.563 million. In 2024, SDG&E cleared 26 poles in Tier 2 and 121 poles in Tier 3. This yields a unit cost of ~$10,631/pole.

The unit cost shown in SDG&E's GRC request and the GRC Decision includes all three Fuels Management activities. The unit cost reflected in SDG&E's GRC request was $11,407/pole. The unit cost reflected in the GRC Decision was $9,538/pole. The approximate annual cost for the fuels grants program and the fuel abatement program is $1.5 million. Removing these costs from the GRC request would modify the unit cost for structural clearing to $8,679/pole.

The higher actual unit cost in 2024 can be attributed to a proportional increase in the number of poles that were cleared for the first time. Initial pole clearing requires additional time to complete the work at each site, requires additional environmental review and on-site monitoring, and increases the costs associated with project management.

c. Given that SDG&E was not issued its GRC Decision until December 23, 2024, it elected to make informed decisions regarding its then-pending GRC Decision earlier in 2024 as it implemented its 2024 WMP initiatives. Absent the GRC Decision, which ultimately authorized some spend for these activities, and in a position to make operational decisions in anticipation of the Decision, SDG&E aligned program budgets with its then-pending Settlement Agreement with CalPA and elected to reduce the scope of this program in 2024. The election to reduce the scope was informed by the knowledge that the remaining poles in the fuels management initiative would be addressed by other risk-reducing vegetation management measures such as pole brushing. Ultimately, the reduced scope of the program is supported by the Decision's reduction to authorized spend for this activity.

Date Received: 05-16-2025
Date Submitted: 05-22-2025

QUESTION 5

Regarding reduction in 2025 targets and expenditures for Distribution Vegetation Inspections (WMP.494) and Pole Clearing (WMP.512)

a. Complete the table below by listing the proposed target in SDG&E's Petition to Amend, unit costs, and total costs in 2021 dollars.

i. If any of the expenditures in the "2025 Total Cost" column are different from the expenditures in the "GRC Authorized Cost" column explain why.

RESPONSE 5

Initiative	Location	Unit	2025 Target in Petition to Amend	2025 Unit Cost (2021 $/unit)	2025 Total Cost (millions of 2021 $)	GRC Authorized Cost (millions of 2021 $)
Distribution Vegetation Inspections (WMP.494)	Non-HFTD	Inspections	0			15.269
Distribution Vegetation Inspections (WMP.494)	HFTD	Inspections	255,000	$121/tree	$30.854	26.612
Pole Clearing (WMP.512)	HFTD + non-HFTD	Poles	22,000	$292/pole	$6.427	5.369

GRC costs are derived from forecasts developed several years in advance of the applicable years and based on estimates and historical costs. Thus, SDG&E's current 2025 projected costs for vegetation management activities are inevitably different from the GRC authorized costs for various reasons. SDG&E's TY 2024 GRC was developed in 2021 with a base-year forecasting methodology that did not account for variations in contracted labor costs per Senate Bill 247, overhead expenses, equipment costs, and contractor liability insurance. The base-year forecasting methodology assumes levels of work and spend to be very close to the previous year's levels of work and spend. These variations in costs are the contributing factors to increased unit costs SDG&E is experiencing with implementing these activities. Second, as discussed in responses to questions 2 and 3, SDG&E is requesting to reduce program targets, thereby reducing program spend, in an effort to align as closely as possible with GRC authorized amounts. However, SDG&E is committed to performing mandatory vegetation management activities, which are reflected with the targets requested, in compliance with PRC § 4292. The mandatory, targeted work at the current unit costs are therefore different from the GRC authorized costs.

Date Received: 05-16-2025
Date Submitted: 05-22-2025

QUESTION 6

Regarding reduction in 2024 targets and expenditure for Fuels Management (WMP.497)

a. Complete the table below by listing the proposed target in SDG&E's Petition to Amend, unit costs, and total costs in 2021 dollars.

i. If any of the expenditures in the "2024 Total Cost" column are different from the expenditures in the "GRC Authorized Cost" column explain why.

RESPONSE 6

Initiative	Location	Unit	2024 Target in Petition to Amend	2024 Unit Cost (2021 $/unit)	2024 Total Cost (millions of 2021 $)	GRC Authorized Cost (millions of 2021 $)
Fuels Management (WMP.497)	HFTD	Poles	150	$21,490/ pole	$3.159	5.264

d. As stated in response to question 4c. above, given that SDG&E was not issued its GRC Decision until December 23, 2024, it elected to make informed decisions regarding its then-pending GRC Decision earlier in 2024 as it implemented its 2024 WMP initiatives. Absent the GRC Decision, which ultimately authorized some spend for this activity, and in a position to make operational decisions in anticipation of the Decision, SDG&E aligned program budgets with its then-pending Settlement Agreement with CalPA and elected to reduce the scope of this program. The election to reduce the scope was informed by the knowledge that the remaining poles in the fuels management initiative would be addressed by other risk-reducing vegetation management measures such as pole brushing. Ultimately, the reduced scope of the program is supported by the Decision's reduction to authorized spend for this activity.

QUESTION 7

Regarding reduction in 2025 target for Covered Conductor (WMP.455)

In its Petition to Amend, SDG&E seeks to increase its 2025 target from 40 miles to 50 miles with the capital expenditure increased from $67.63 million to $81.43 million.[21] SDG&E's petition produces a unit cost of $1.623 million per mile.

In the GRC decision, the CPUC adopted $71.9 million for 100 miles of covered conductor, for an average cost of less than $1 million per mile.[22]

Explain the $1.623 million unit cost for covered conductor. Present the historic unit cost data and itemize the key expenses included when estimating the unit cost for covered conductor.

RESPONSE 7

The Commission adopted TURN's recommendation of $800,000/mile of covered conductor installation, which was informed by average unit costs across California utilities. This unit cost is flawed in that it does not consider SDG&E's full scope of covered conductor deployment, which includes replacing other assets such as structures, crossarms, lightning arrestors and avian protection (as discussed in question 1), fuses, etc. Additionally, SDG&E leverages LiDAR survey pre-construction (design) and post-construction (True-Up Analysis). It engineers and designs facilities using PLS-CADD, not OCalc Pro or SpidaCalc. PLS-CADD is the most robust and accurate way to ensure poles, crossarms, guys, anchors, and wire sag/tension/clearances are built correctly and meet or exceed GO95 or internal SDG&E Standards. OCalc Pro and SpidaCalc are not as accurate when it comes to loading calculation nor do they perform wire sag/tension/clearance analysis. SDG&E also has a robust post-construction QA/QC process where each facility is inspected by a Qualified Electrical Worker. These are all contributing factors to SDG&E's higher unit cost than was authorized in the Decision.

Furthermore, the costs incurred in any given year do not directly correlate to the miles energized in the same year. The installation of covered conductor is complex work that requires many months, sometimes spanning multiple years, for project initiation through construction and energization. Consistent with the Commission's authorization for covered conductor units in the Decision, SDG&E plans to increase its covered conductor deployment in future years, which is reflected in its 2026-2028 WMP. Therefore, the 2025 projected spend of $81.43 million includes costs for work planned to be completed in 2025, 2026, and 2027, and it is inappropriate to unitize these costs across the 50 miles planned in 2025. Key expenses that influence the cost forecast for covered conductor include pre-construction activities (project management, scheduling,

[21] San Diego Gas & Electric Company, San Diego Gas & Electric 2025 Petition to Amend, Published April 10, 2025, Attachment A, page 2; URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58234&shareable=true).
[22] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, pages 471-474, D. 24-12-074, Published December 23, 2024, URL: (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf).

engineering and design, GIS, surveying, permitting, public relations, etc) and construction activities (labor, equipment, and materials). These costs can be incurred in multiple years during the life of a project depending on when the project is initiated and the project schedule.

The table below presents average, historical direct costs, program-to-date for key cost elements:

Direct Costs Category	**$ Amount**
Labor (Internal)	$ 278,000
Materials	$ 197,000
Contractor	$ 260,000
Overhead (division, corporate, etc.)	$ 350,000
Total Direct Cost per Mile 2023 $	**$ 1,085,000**

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-04
SDG&E RESPONSE

Date Received: 05-16-2025
Date Submitted: 05-22-2025

QUESTION 8

Regarding reduction in 2025 targets/expenditure for Strategic Pole Replacement Program (WMP.1189)
In its Petition to Amend, SDG&E seeks to decrease its 2025 target from 291 poles to 200 poles while requesting to increase its capital expenditure from $6.948 million to $7.923 million.

As provided in SDG&E's response to Data Request OEIS-P-WMP_2025-SDGE-01,[23] the Strategic Pole Replacement Program initiative (WMP.1189) is part of the High Risk Pole Replacement Program in the GRC decision, which is an uncontested category in the GRC decision.[24]

a. Provide an explanation for the reduced target and increased expenditure.

b. Provide an explanation for increased unit cost for the initiative, given the increased expenditure and decrease in target.

RESPONSE 8

a. SDG&E increased its target from 200 poles to 291 poles in its 2025 WMP Update (Update) submitted on July 5, 2024. At the time it prepared and submitted the Update, it had limited program experience and cost data to accurately inform an updated cost forecast. Consequently and as filed in the Update, it only increased its forecasted costs from $6.701 million to $6.948 million, a 4% increase inconsistent with the target increase of 46%. This discrepancy is due in large part to the challenges posed by Energy Safety's Process and Evaluation Guidelines requiring the utilities to transition to the year-ahead process for submitting annual WMP updates. SDG&E's annual capital planning process typically occurs in quarter 4 of the year preceding the planning year. In this case, SDG&E developed its 2025 WMP initiative targets in late 2023 in preparation to submit its Update in early 2024, a year in advance of 2025. Because SDG&E's annual planning process did not align with the newly introduced year-ahead WMP process, this cost forecast was likely overlooked.

   Subsequently, the Petition to Amend reflects a target reduction back down to 200 poles, which is a result of SDG&E aligning its capital planning process for the entire WMP portfolio given the GRC Decision. If SDG&E had continued with 291 poles targeted, the forecasted spend would have exceeded authorized and increased overall portfolio spend to levels beyond authorized. The projected 2025 spend of $7.923 million reflects the current cost forecast for the

[23] San Diego Gas & Electric Company, SDGE Response OEIS-P-WMP_2025-SDGE-01_ AttachQ2, Published April 28, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58356&shareable=true).
[24] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, page 485, D. 24-12-074, Published December 23, 2024, URL: (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf).

200 poles initially planned and reasonably aligns with overall WMP portfolio authorized levels.

b. Unit costs for this initiative did not increase. Rather, there was an inadvertent and discrepant units to costs ratio presented in SDG&E's 2025 WMP Update as described above.

QUESTION 9

Regarding reduction in targets for uncontested initiatives and for initiatives that the GRC decision adopted SDG&E's proposal

In its Petition to Amend, SDG&E requested target changes for nine initiatives and accompanying expenditure reductions for initiatives that were not contested in the GRC.[25]

- 2024 target changes
  - Distribution Communications Reliability Improvements (WMP.549)
  - Distribution Infrared Inspections (WMP.481)
  - Standby Power Program (WMP.468)
    - The GRC decision adopted SDG&E's proposal.[26]

- 2024 and 2025 target changes
  - Drone Assessments (WMP.552)

- 2025 target changes
  - Strategic Pole Replacement Program (WMP.1189)
  - Transmission OH Hardening (WMP.543)
  - Distribution Communications Reliability Improvements (WMP.549)
  - Connectors, including hotline clamps (WMP.464)
  - Expulsion Fuse Replacement (WMP.459)

Provide explanations for each of the target and expenditure reductions for the above initiatives.

RESPONSE 9

2024 Target Changes
Distribution Communications Reliability Improvements (WMP.549)
SDG&E elected to transition from a high-volume deployment of this program to a more targeted deployment while continuing to assess the benefit of this program and where additional efficiencies could be achieved through refined practices and alternative technology. This change will result in a delay to some of the communications reliability improvements expected from the SDG&E-owned private LTE network that supports some of SDG&E's Advanced Protection Programs (APP), including Falling Conductor Protection (FCP) and Early Fault Detection (EFD). FCP and EFD work will continue to be deployed on this new network where available, and will utilize alternate technologies for support when necessary.

Distribution Infrared Inspections (WMP.481)
SDG&E transitioned this program to a risk-informed approach in an effort to optimize outcomes. In prior years, structures selected for this program were based on previous inspections, to ensure

[25] San Diego Gas & Electric Company, San Diego Gas & Electric 2025 Petition to Amend, Published April 10, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58234&shareable=true).
[26] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, page 487, D. 24-12-074, Published December 23, 2024, URL: (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf).

inspections were not repeated in consecutive years, and were informed by subject matter expert recommendations. However, SDG&E found that this inspection program yielded only a 0.2 percent find rate. To optimize the program for 2024, specific areas were targeted during peak load season and structures were selected using a risk-informed strategy comprised of SDG&E's Asset 360 models, risk analytics models, and Intelligent Image Processing (IIP). This program will continue with the risk-informed approach in 2025, and inspections will be performed on 300 structures, as approved in SDG&E's 2025 WMP Update.

Standby Power Program (WMP.468)
SDG&E elected to scale back on the scope of this program because no new customers had been identified to include in scope of the program due to the lack of PSPS de-energizations from 2021 to mid-2024. SDG&E will continue to explore additional PSPS mitigation approaches for its customers and expects this program to evolve in the 2026-2028 WMP cycle.

Drone Assessments (WMP.552)
SDG&E reevaluated the program to optimize the number of inspections based on further risk assessment. This reevaluation aimed to balance expected risk reduction with expected repair and replacement costs and timelines. The historical number and severity of findings from the first year of program implementation (2023), along with historical repair and replacement costs, were evaluated against the expected wildfire risk consequences at each asset location. This resulted in a determination to perform 6,500 inspections, which represented a balanced approach that still maximized risk reduction.

2025 Target Changes
Drone Assessments (WMP.552)
SDG&E reevaluated the program to optimize the number of inspections based on further risk assessment. This reevaluation aimed to balance expected risk reduction with expected repair and replacement costs and timelines. The historical number and severity of findings from the first year of program implementation (2023), along with historical repair and replacement costs, were evaluated against the expected wildfire risk consequences at each asset location. This resulted in a determination to perform 6,500 inspections, which represented a balanced approach that still maximized risk reduction.

Strategic Pole Replacement Program (WMP.1189)
SDG&E is not descoping work for this program; rather, it is extending the timeframe for which it will complete the scoped work to achieve cost relief in 2025. There is no impact to expected risk reduction as these poles will continue to be maintained with routine inspections, including wood pole intrusive inspections, which determine the integrity of the pole. Findings will be corrected in timeframes determined by the severity and in compliance with GO 95.

Transmission OH Hardening (WMP.543)
This reduction is due to a dependency on distribution underbuild that was previously scoped for strategic undergrounding but will no longer be performed in 2025 due to the undergrounding program reductions. Therefore, the transmission hardening work requires either a re-design to account for the distribution underbuild or will be shifted to future years when the distribution underbuild is undergrounded.

Distribution Communications Reliability Improvements (WMP.549)

SDG&E elected to continue projects in construction, and then pause this program. This program has no direct impact to risk reduction and therefore will not change SDG&E's risk profile.

Connectors, including hotline clamps (WMP.464)
Rather than proactive, high-volume deployment of these assets, SDG&E will strategically deploy these assets with the deployment of covered conductor and continue to replace them as needed as part of its Corrective Maintenance Program (CMP). This deployment plan will achieve cost efficiencies and prioritize higher risk circuit segments in tandem with covered conductor. The program target has not been completely reduced to zero but instead is aligned with the intended covered conductor mileage planned for 2025. SDG&E also notes that the GRC Decision adopted TURN's recommendation for cost per unit of covered conductor at $800,000/mile, which SDG&E finds unreasonable and rebuts given its historical cost per unit that incorporates not only reconductor work, but also associated asset replacements such as structures, connectors, lightning arrestors, fuses, avian protection, etc. SDG&E finds it reasonable to reallocate the authorized spend for this program to Covered Conductor (WMP.455) because it will continue to replace those assets as it deploys covered conductor and to increase its Covered Conductor program budget to account for a more realistic and reasonable unit cost.

Expulsion Fuse Replacement (WMP.459)
Rather than proactive, high-volume deployment of these assets, SDG&E will strategically deploy these assets with the deployment of covered conductor and continue to replace them as needed as part of its Corrective Maintenance Program (CMP). This deployment plan will achieve cost efficiencies and prioritize higher risk circuit segments in tandem with covered conductor. The program target has not been completely reduced to zero but instead is aligned with the intended covered conductor mileage planned for 2025. SDG&E also notes that the GRC Decision adopted TURN's recommendation for cost per unit of covered conductor at $800,000/mile, which SDG&E finds unreasonable and rebuts given its historical cost per unit that incorporates not only reconductor work, but also associated asset replacements such as structures, connectors, lightning arrestors, fuses, avian protection, etc. SDG&E finds it reasonable to reallocate the authorized spend for this program to Covered Conductor (WMP.455) because it will continue to replace those assets as it deploys covered conductor and to increase its Covered Conductor program budget to account for a more realistic and reasonable unit cost.

QUESTION 10

Regarding revenue requirement and capital expenditure

In its Petition to Amend, SDG&E indicated that there is a "Revenue Requirement Shortfall" of $0.148 billion to complete the GRC-authorized capital expenditure (Capex).[27] In addition, SDG&E stated the total "Actual/Forecasted Capex" is $1.045 billion while the total "Adjusted Capex Target" is $1.086 billion.[28]

The GRC decision stated that the CPUC adopted "…a base margin revenue (O&M and capital revenue requirement) increase of 3 percent each year for 2025, 2026, and 2027 plus certain wildfire mitigations, including undergrounding and covered conductor" which allows SDG&E to "fund incremental capital additions for wildfire mitigation programs that are important for infrastructure safety."[29] The GRC decision goes on to state that it provides "… both just and reasonable returns for the utilities and affordable rates for ratepayers."[30]

a. Provide a reference from the GRC decision (include a URL and page number) for the in the "Authorized Capital Expenditures (Capex)" values SDG&E provides in its Petition to Amend.[31]

b. Provide explanations for the "Revenue Requirement Shortfall".

c. Provide high-level explanation on the calculation of "Adjusted Capex Target".

d. Provide explanations to the $41 million difference between the total "Actual/Forecasted Capex" and "Adjusted Capex." [32]

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[27] San Diego Gas & Electric Company, San Diego Gas & Electric 2025 Petition to Amend, Published April 10, 2025, page 5; URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58234&shareable=true).
[28] San Diego Gas & Electric Company, San Diego Gas & Electric 2025 Petition to Amend, Published April 10, 2025, page 5; URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58234&shareable=true).
[29] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, pages 895-902, D. 24-12-074, Published December 23, 2024, URL: (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf).
[30] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, pages 895-902, D. 24-12-074, Published December 23, 2024, URL: (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf).
[31] San Diego Gas & Electric Company, San Diego Gas & Electric 2025 Petition to Amend, Published April 10, 2025, page 5; URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58234&shareable=true).
[32] San Diego Gas & Electric Company, San Diego Gas & Electric 2025 Petition to Amend, Published April 10, 2025, page 5; URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58234&shareable=true).

RESPONSE 10

a. Capital expenditures for Wildfire Mitigation are discussed in Section 19.3.5 (pages 471-486) in 2024 GRC Decision: https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf.

The "Authorized Capital Expenditures (Capex)" values denote direct dollar amounts that include escalation. Conversely, the data presented in our 2024 General Rate Case (2024 GRC) decision reflects direct dollar amounts in 2021 base year dollars (excludes escalation). For instance, the 2024 Authorized Capital Expenditures value of $396 million, as indicated in the table, corresponds to the $321 million total for WMVM Capital Costs for the 2024 Test Year, found in Table 19.18 on page 495 of SDG&E's 2024 GRC Final Decision. The $396 million in capital for 2024, is escalated directly in SDG&E's RO Model, that supports the 2024 GRC Final Decision revenue requirement. The 2025-2027 capital values are imputed for the purposes of the RSAR and are consistent with the adopted post-test year mechanism.

b. The 2024 GRC Decision does not calculate revenue requirement separately for all of Wildfire Mitigation. Thus, SDG&E performed the revenue requirement calculations noted below for purposes of the Petition to Amend. To calculate the revenue requirement shortfall, SDG&E calculated the revenue requirement, using a combination of the Results of Operations Model adopted in the 2024 GRC Decision and the Project Evaluation Tool (SDG&E's internal financial model used to calculate revenue requirements) for two scenarios:

Scenario No. 1 ("Authorized Revenue Requirement"): The "Authorized Revenue Requirement" represents what was approved in the 2024 GRC and adopted PTY mechanism, which implemented several substantial reductions to SDG&E's requested wildfire mitigation costs. This "Authorized Revenue Requirement" encompasses: 1) the revenue requirements for covered conductor and strategic undergrounding for each year of the GRC cycle, as explicitly authorized by the CPUC, and 2) an approximate 3 percent annual revenue requirement increase for all other wildfire mitigation programs.

However, this authorized revenue requirement falls significantly short of the revenue requirement necessary to fulfill the authorized capital expenditures indicated in the first row of the table.

Scenario No. 2 ("Revenue Requirement necessary to complete Authorized Capex"): In accordance with the CPUC's 2024 GRC Final Decision, SDG&E was authorized capital expenditure forecasts for wildfire mitigation initiatives for Test Year 2024. This level of 2024 spending, and the corresponding imputed figures for the post-test years (2025-2027), are presented in the first row of the table, "Authorized Capital Expenditures (Capex)". The calculated revenue requirement tied to this level of expenditure is reflected in the "Revenue Requirement necessary to complete Authorized Capex" row of the table.

The difference between the two scenarios represents the "Revenue Requirement Shortfall".

To reiterate, given that the GRC Decision was issued at the conclusion of Test Year 2024, SDG&E had essentially completed its WMP-related activities for 2024 without definitive funding guidance. As previously mentioned, in the absence of such guidance, SDG&E relied on the Settlement Agreement with Cal Advocates to inform its wildfire mitigation expenditures for 2024. However, this agreement was ultimately rejected by the CPUC, who further reduced the authorized funding for WMP-related activities.

The resulting 3 percent annual revenue requirement increase authorized by the CPUC for all other wildfire mitigation programs outside of covered conductor and undergrounding results in SDG&E not being able to invest in new capital. Instead, it allows SDG&E to continue servicing the assets placed into service in 2024. Consequently, if SDG&E were to spend its authorized O&M and capital expenditures each year of the GRC cycle, SDG&E would exceed its authorized revenue requirement. This situation arises because the capital funding required to perform the necessary work exceeds the approximately 3 percent annual revenue requirement increase approved in the 2024 GRC.

c. The "Adjusted Capex Target" represents the level of spending required to adhere to the revenue requirement authorized for the overall wildfire mitigation program in accordance with the 2024 GRC Final Decision. To remain within the authorized revenue requirement and because SDG&E exceeded its capital expenditures in 2024, it is necessary to reduce SDG&E's wildfire mitigation spending for 2025, 2026, and 2027.

d. As noted above, the "Adjusted Capex Target" represents the level of spending required to adhere to the revenue requirement authorized for the overall wildfire mitigation program in accordance with SDG&E's 2024 GRC Final Decision. The "Actual/Forecasted Capex" represents the revised forecasted spending outlined in SDG&E's Petition to Amend, aimed at ensuring alignment with the costs authorized with SDG&E's 2024 GRC Final Decision. Ideally, the total for these two rows are identical. However, the $41M delta represents less than a four percent difference relative to the "Adjusted Capex Target" total.

   It should be noted that the "Adjusted Capex Target" was derived based on a number of financial assumptions. Any deviations from these assumptions in practice may result in the revenue requirement being subject to change.

Date Received: 05-16-2025
Date Submitted: 05-22-2025

QUESTION 11

In the GRC decision, the CPUC decided not to modify the Wildfire Mitigation Plan Memorandum Account (WMPMA).[33],[34] The decision also converted the existing two-way Tree Trimming Balancing Account into a one-way Vegetation Management Balancing Account (VMBA) with an accompanying Vegetation Management Memorandum Account (VMMA) for spend above the VMBA authorization.

Provide the table from pages 2 and 3 of the Petition to Amend listing the initiatives. For each, identify whether the initiative is eligible to be booked in the WMPMA, the VMBA, or the VMMA.

RESPONSE 11

WMP Initiative	Unit	Original Target	Requested Target	WMPMA, VMBA or VMMA
2024 Requested Changes				
Distribution Communications Reliability Improvements (WMP.549)	base stations	60	5	WMPMA
Standby Power Program (WMP.468)	generators	300	58	WMPMA
Drone Assessments (WMP.552)	inspections	13,500	6,500	WMPMA
Distribution Infrared Inspections (WMP.481)	inspections	9,532	300	WMPMA
Fuels Management (WMP.497)	poles	500	150	VMBA/VMMA
2025 Requested Changes				
Strategic Undergrounding (WMP.473)	miles	125	28	WMPMA

[33] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, pages 495-496, D. 24-12-074, Published December 23, 2024, URL:(https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf).
[34] California Public Utilities Commission, Decision addressing the 2024 test year general rate cases of Southern California Gas Company and San Diego Gas & Electric Company, pages 496-497, 1090-1091, D. 24-12-074, Published December 23, 2024, URL:(https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf).

Date Received: 05-16-2025
Date Submitted: 05-22-2025

WMP Initiative	Unit	Original Target	Requested Target	WMPMA, VMBA or VMMA
Covered Conductor (WMP.455)	miles	40	50	WMPMA
Strategic Pole Replacement Program (WMP.1189)	Poles	291	200	WMPMA
Transmission OH Hardening	Miles	4.64	2	WMPMA
Distribution Communications Reliability Improvements (WMP.549)	base stations	42	5	WMPMA
Drone Assessments (WMP.552)	inspections	13,500	6,500	WMPMA
Lightning Arrester Removal/Replacement (WMP.550)	lightning arresters	1,848	90	WMPMA
Connectors, including hotline clamps (WMP.464)	hotline clamps	950	100	WMPMA
Avian Protection (WMP.972)	poles	200	95	WMPMA
Expulsion Fuse Replacement (WMP.459)	fuses	700	80	WMPMA
Detailed Vegetation Inspections (WMP.494)	inspections	485,400	255,000	VMBA/VMMA
Pole Clearing (WMP.512)	poles	33,010	22,000	VMBA/VMMA

Date Received: 05-16-2025
Date Submitted: 05-22-2025

END OF REQUEST