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VIA E-FILING **Docket #2026-2028-Base-WMPs**

Tony Marino, Deputy Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: San Diego Gas & Electric Company's 2026-2028 Base Wildfire Mitigation Plan Non-Substantive Errata

Dear Deputy Director Marino:

Pursuant to Section 7 of the Office of Energy Infrastructure Safety's ("Energy Safety") Process Guidelines, San Diego Gas & Electric's ("SDG&E") hereby submit additional non-substantive errata to its 2026-2028 Base Wildfire Mitigation Plan ("WMP").[1] The table below lists each non-substantive errata and a redline of the relevant pages showing the corrections are included as Attachment A.

Please note that references to pages numbers in other tables throughout SDG&E's WMP have been automatically updated to reflect the errata further described below but will be reflected in SDG&E's final WMP submission.

SDG&E appreciates Energy Safety's inclusion of SDG&E's errata to its WMP submission.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company

[1] SDG&E's 2026-2028 Base WMP is also available at SDG&E's website: https://www.sdge.com/2026-2028-wildfire-mitigation-plan

Table of SDG&E's Non-substantive Errata to its 2026-2028 Base WMP

Item	Location of Issue in the 2026-2028 WMP	Description/Reason for Correction
1	OEIS Table 8-1 (p. 130); Section 8.2.1.3 (p. 135)	Corrected risk reduction for 2028 for Combined Covered Conductor (WMP.455) from 41.73. to 43.89 due to a data transfer error This change also impacts "SDG&E_2026-2028_Base-WMP_OEIS Guideline Tables_R0.xlsx", Table 8-1.
2	Section 8.5.2.2 (p. 183); Section 8.5.2.3 (p. 184); Section 8.5.4.1 (p. 186)	Inserted proper names of procedure documents rather than abbreviated name only
3	Section 8.6.4 (p. 193)	Added full name of TCM 807 procedure document, as well as restructuring sentence slightly
4	Section 8.7.3.1 (p. 201); Section 9.9.3 (p. 223)	Defined acronym ESP as "Electric Standard Practice" in Section 8.7.3 and removed acronym definition in Section 9.9.3
5	Section 9.4.2 (p. 215)	Corrected name of procedure from "Pole Brush Pre-Inspectors/Auditors Procedures" to "Pre-Inspection Activity" to reflect the current name of the procedure rather than the draft name of the procedure.
6	Section 10.5.5 (p. 254)	Removed "table 3" at end of second paragraph as it was a duplicative reference

Attachment A

Redlines of SDG&E's 2026-2028 Base WMP Non-substantive Errata

OEIS Table 8-1: Grid Design, Operations, and Maintenance Targets by Year

Initiative	Quantitative or Qualitative Target	Activity (Tracking ID #)	Previous Tracking ID (if applicable)	Target Unit	2026 Target / Status	% Planned in HFTD for 2026	% Planned in HFRA for 2026	% risk reduction for 2026	2027 Total/ Status	% Planned in HFTD for 2027	% Planned in HFRA for 2027	% risk reduction for 2027	2027 Total/ Status	% Planned in HFTD for 2028	% Planned in HFRA for 2028	% risk reduction for 2028	3-year total	Section; Page number
Work Orders	Qualitative	Corrective Maintenance Program (CMP) (WMP.1433) - Repair wildfire-related conditions within established timeframes	n/a	n/a	By 12/31/2026, complete repairs within required timeframes	n/a	n/a	n/a	By 12/31/2027, complete repairs within required timeframes	n/a	n/a	n/a	By 12/31/2028, complete repairs within required timeframes	n/a	n/a	n/a	n/a	8.6; p. 191~~190~~
Equipment Maintenance and Repair	Qualitative	Transmission Asset Health (WMP.1458) - Analyze asset health for transmission shield wire, insulators, and hardware; explore proactive replacement strategies	n/a	n/a	By 12/31/2026, begin data analysis of asset health, current condition, and outage history of transmission equipment	n/a	n/a	n/a	By 12/31/2027, continue analysis of transmission equipment, and review and adjust replacement strategies	n/a	n/a	n/a	By 12/31/2028, continue analysis of transmission equipment, and review and adjust replacement strategies	n/a	n/a	n/a	n/a	8.4; p. 173
Grid Ops and Procedures	Qualitative	Personnel Training (WMP.1452)- Examine electric line crew training and incorporate updates annually.	n/a	n/a	By 12/31/2026, update electric line crew training.	n/a	n/a	n/a	By 12/31/2027, update electric line crew training.	n/a	n/a	n/a	By 12/31/2028, update electric line crew training.	n/a	n/a	n/a	n/a	8.7; 196
Workforce Planning	Qualitative	Workforce Planning (Asset Mgmt) - Consult with subject	n/a	n/a	By 12/31/2026, update Storm and PSPS	n/a	n/a	n/a	By 12/31/2027, update Storm and	n/a	n/a	n/a	By 12/31/2028, update Storm and	n/a	n/a	n/a	n/a	8.8; p. 203

Initiative	Quantitative or Qualitative Target	Activity (Tracking ID #)	Previous Tracking ID (if applicable)	Target Unit	2026 Target / Status	% Planned in HFTD for 2026	% Planned in HFRA for 2026	% risk reduction for 2026	2027 Total/ Status	% Planned in HFTD for 2027	% Planned in HFRA for 2027	% risk reduction for 2027	2027 Total/ Status	% Planned in HFTD for 2028	% Planned in HFRA for 2028	% risk reduction for 2028	3-year total	Section; Page number
		matter experts to update the Storm and PSPS curriculum. (WMP.1453)			training with lessons learned.				PSPS training with lessons learned.				PSPS training with lessons learned.					
Other grid topology improvements to mitigate or reduce PSPS events	Qualitative	Standby Power Program: (WMP.468) Assess and enable resiliency and backup power solutions for eligible non-residential customers in the high fire threat district.	n/a	n/a	By 12/31/2026, enable backup power solutions of priority sites.	n/a	n/a	n/a	By 12/31/2027, enable backup power solutions of priority sites.	n/a	n/a	n/a	By 12/31/2028, enable backup power solutions of priority sites.	n/a	n/a	n/a	n/a	8.2.11; p. 147
Other grid topology improvements to mitigate or reduce PSPS events	Qualitative	Customized Resiliency Assessments: (WMP.1432) Assess and enable resiliency and backup power solutions for eligible residential customers in the high fire threat district.	n/a	n/a	By 12/31/2026, offer resiliency support for eligible customers.	n/a	n/a	n/a	By 12/31/2027, offer resiliency support for eligible customers.	n/a	n/a	n/a	By 12/31/2028, offer resiliency support for eligible customers.	n/a	n/a	n/a	n/a	8.2.11; p. 147
Other grid topology improvements to mitigate or reduce PSPS events	Qualitative	Generator Assistance Program: (WMP.467) Provide rebates on backup power	n/a	n/a	By 12/31/2026, enable rebates for backup power	n/a	n/a	n/a	By 12/31/2027, enable rebates for backup power	n/a	n/a	n/a	By 12/31/2028, enable rebates for backup power	n/a	n/a	n/a	n/a	8.2.11; p. 147

Initiative	Quantitative or Qualitative Target	Activity (Tracking ID #)	Previous Tracking ID (if applicable)	Target Unit	2026 Target / Status	% Planned in HFTD for 2026	% Planned in HFRA for 2026	% risk reduction for 2026	2027 Total/ Status	% Planned in HFTD for 2027	% Planned in HFRA for 2027	% risk reduction for 2027	2027 Total/ Status	% Planned in HFTD for 2028	% Planned in HFRA for 2028	% risk reduction for 2028	3-year total	Section; Page number
		solutions for eligible customers in the high fire threat district.			solutions for eligible customers.				solutions for eligible customers.				solutions for eligible customers.					
Grid Design and System Hardening	Quantitative	Combined Covered Conductor (WMP.455)	n/a	Miles	50	100%	n/a	23.82%	50	100%	n/a	34.43%	30	100%	n/a	43.89 ~~41.73~~ %	130	8.2.1; p. 133
Grid Design and System Hardening	Quantitative	PSPS Sectionalizing Enhancements (WMP.461)	n/a	Switches	7	100%	n/a	n/a	6	100%	n/a	n/a	5	100%	n/a	n/a	18	8.2.11; p. 147
Grid Design and System Hardening	Quantitative	Microgrids (WMP.462)	n/a	Microgrids	0	n/a	n/a	n/a	0	n/a	n/a	n/a	1	100%	n/a	100%	1	8.2.7; p. 142
Grid Design and System Hardening	Quantitative	Advanced Protection (WMP.463)	n/a	Nodes	30	100%	n/a	1.81%	30	100%	n/a	1.89%	30	100%	n/a	1.88%	90	8.2.8.1; p. 143
Grid Design and System Hardening	Quantitative	Strategic Undergrounding (WMP.473)	n/a	Miles	0	n/a	n/a	n/a	0	n/a	n/a	n/a	50	100%	n/a	98.38 %	50	Section 8.2.2; p. 134
Grid Design and System Hardening	Quantitative	Distribution Overhead System Hardening (WMP.475)	n/a	Miles	6.53	100%	n/a	3.12%	0	n/a	n/a	n/a	0	n/a	n/a	n/a	6.53	8.2.5.1; p. 139
Grid Design and System Hardening	Quantitative	Transmission Overhead Hardening (WMP.543)	n/a	Miles	6.02	100%	n/a	n/a	11.94	100%	n/a	n/a	3	100%	n/a	n/a	20.96	8.2.5.2; p. 141
Grid Design and System Hardening	Quantitative	Transmission Overhead Hardening (Distribution	n/a	Miles	1.2	100%	n/a	n/a	7.1	100%	n/a	n/a	3	100%	n/a	n/a	11.3	8.2.5.2; p. 141

Initiative	Quantitative or Qualitative Target	Activity (Tracking ID #)	Previous Tracking ID (if applicable)	Target Unit	2026 Target / Status	% Planned in HFTD for 2026	% Planned in HFRA for 2026	% risk reduction for 2026	2027 Total/ Status	% Planned in HFTD for 2027	% Planned in HFRA for 2027	% risk reduction for 2027	2027 Total/ Status	% Planned in HFTD for 2028	% Planned in HFRA for 2028	% risk reduction for 2028	3-year total	Section; Page number
		Underbuild) (WMP.545)																
Grid Design and System Hardening	Quantitative	Strategic Pole Replacement (WMP.1189)	n/a	Poles	200	93%	n/a	1.35%	200	86%	n/a	1.50%	200	70%	n/a	1.36%	600	8.2.10; p. 146
Asset Inspections	Quantitative	Distribution Overhead Detailed Inspections (WMP.478)	n/a	Inspections	21,924	100%	n/a	8.10%	17,779	100%	n/a	7.02%	11,537	100%	n/a	7.73%	51,240	8.3.1; p. 155
Asset Inspections	Quantitative	Transmission Overhead Detailed Inspections (WMP.479)	n/a	Inspections	2,447	83%	n/a	n/a	2,524	81%	n/a	n/a	2,545	87%	n/a	n/a	7,516	8.3.2; p. 157
Asset Inspections	Quantitative	Transmission Infrared Inspections (WMP.482)	n/a	Inspections	7,294	84%	n/a	n/a	7,294	84%	n/a	n/a	7,294	84%	n/a	n/a	21,882	8.3.3; p. 159
Asset Inspections	Quantitative	Distribution Wood Pole Intrusive Inspections (WMP.483)	n/a	Inspections	1,214	100%	n/a	2.62%	5,477	100%	n/a	3.94%	11,923	100%	n/a	5.23%	18,614	8.3.4; p. 161
Asset Inspections	Quantitative	Transmission Wood Pole Intrusive Inspections (WMP.1190)	n/a	Inspections	68	100%	n/a	n/a	196	100%	n/a	n/a	24	100%	n/a	n/a	288	8.3.5; p. 163
Asset Inspections	Quantitative	Risk-Informed Drone Inspections (WM.552)	n/a	Inspections	6,500	85%	n/a	1.24%	6,500	96%	n/a	1.54%	6,500	98%	n/a	1.91%	19,500	8.3.6; p. 164
Asset Inspections	Quantitative	Distribution Overhead Patrol Inspections (WMP.488)	n/a	Inspections	84,678	100%	n/a	7.34%	84,678	100%	n/a	7.34%	84,678	100%	n/a	7.34%	254,034	8.3.7; p. 168

Initiative	Quantitative or Qualitative Target	Activity (Tracking ID #)	Previous Tracking ID (if applicable)	Target Unit	2026 Target / Status	% Planned in HFTD for 2026	% Planned in HFRA for 2026	% risk reduction for 2026	2027 Total/ Status	% Planned in HFTD for 2027	% Planned in HFRA for 2027	% risk reduction for 2027	2027 Total/ Status	% Planned in HFTD for 2028	% Planned in HFRA for 2028	% risk reduction for 2028	3-year total	Section; Page number
Asset Inspections	Quantitative	Transmission Overhead Patrol Inspections (WMP.489)	n/a	Inspections	7,454	84%	n/a	n/a	7,454	84%	n/a	n/a	7,454	84%	n/a	n/a	22,362	8.3.8; p. 169
Asset Inspections	Quantitative	Substation Patrol Inspections (WMP.492)	n/a	Inspections	381	100%	n/a	n/a	381	100%	n/a	n/a	381	100%	n/a	n/a	1,143	8.3.9; p. 171

8.2 GRID DESIGN AND SYSTEM HARDENING

8.2.1 COMBINED COVERED CONDUCTOR INSTALLATION (WMP.455)

8.2.1.1 TRACKING ID

WMP.455

8.2.1.2 OVERVIEW OF THE ACTIVITY

The Combined Covered Conductor Program (WMP.455) replaces bare conductors with covered conductors in the HFTD and, as needed, includes additional equipment replacements and installations such as structures, lighting arrestors, fuses, connectors, and avian protection. Covered conductors are manufactured with an internal semiconducting layer and external insulating ultraviolet-resistant layers to provide incidental contact protection. The WiNGS-Planning model is utilized to prioritize installation within the HFTD.

Targets for the 2026 to 2028 WMP cycle are provided in OEIS Table 8-1.

8.2.1.3 IMPACT OF THE ACTIVITY ON WILDFIRE RISK

Trend Analysis

Implementation of the Combined Covered Conductor Program began in 2020. As of the end of 2024, 183 miles were reinforced with covered conductors. Due to the limited extent of implementation and available data, it is not yet feasible to conduct a comprehensive trend analysis of the program.

SDG&E participated in a Joint IOU study that resulted in a detailed assessment of the efficacy of covered conductors by driver. The effectiveness of the Combined Covered Conductor Program varies based on each ignition cause (e.g., the activity reduces ignitions caused by animal contact, balloon contact, and vegetation contact by an estimated 90 percent while it reduces ignitions caused by vehicle contact by an estimated 20 percent). By applying these findings to ignition counts and evidence of heat data, it was determined that the use of combined covered conductors results in a 46 percent efficacy in risk reduction.

Wildfire Risk Reduction

This program reduces the likelihood of ignitions because covered conductors are manufactured with an internal semiconducting layer and external insulating ultraviolet-resistant layers to provide incidental contact protection. All connections are insulated, and any exposed conductor ends are covered with insulation. This program includes installation of additional equipment such as lightning arrestors, transformer bushings, fuses, and other equipment use avian cover-up material that can also provide incidental contact protection. Combined Covered Conductor does not impact the consequence of ignitions.

For the target scoped in the 2026 to 2028 WMP cycle, the expected risk reduction is 23.82 percent for 2026, 34.43 percent in 2027, and 43.89~~41.73~~ percent in 2028.

For an explanation of the calculation, a list of assumptions, and justifications for each assumption see Appendix G.

8.5.2 QA AND QC PROCEDURES

8.5.2.1 GRID DESIGN AND SYSTEM HARDENING

QA/QC of Grid Hardening: Combined Covered Conductor (WMP.455), Strategic Undergrounding (WMP.473), Distribution Overhead System Hardening (WMP.475), Transmission Overhead Hardening (WMP.543), Transmission Overhead Hardening (Distribution Underbuild) (WMP.545), Advanced Protection (WMP.463), Early Fault Detection (WMP.1195), Strategic Pole Replacement Program (WMP.1189), and PSPS Sectionalizing Enhancements (WMP.461)

Quality Assessment/Quality Control (QA/QC) of electric transmission and distribution facilities constructed within the WMP initiatives defined above are conducted by the Portfolio & Project Management (PPM) Quality Assurance & Quality Control team.

Procedures:

- Portfolio & Project Management Quality Assurance & Quality Control Plan, Revision 0, dated December 31, 2023
- ESP 1028: Priority CMP Corrective Action Business Process, Revision 0, dated September 6, 2019
- ESP 1031: Emergency CMP Corrective Action Business Process, Revision 0, dated September 6, 2019

8.5.2.2 ASSET INSPECTIONS

QA/QC of Transmission Inspections (WMP.1191)

QA/QC of transmission inspections is also referred to as secondary assessments for conditions identified during inspection. The process for these secondary assessments is outlined in SDG&E's internal transmission line maintenance practices for the purpose of validating inspection results.

Procedure: Transmission Construction & Maintenance (TCM) 807: Transmission Line Maintenance Practices, Section 5.2 Condition Assessment; Version 8G, effective December 16, 2024

QA/QC of Distribution Detailed Inspections (WMP.491)

QA/QC of distribution detailed inspections documents whether any additional fire or safety issues were identified or whether any fire or safety issues were misidentified (i.e. modification or cancellation of the finding). Additionally, randomly selected audits are also conducted to document whether any potential fire or safety issues were observed that were not identified during the inspection.

Procedure: ESP 612: CMP Quality Assurance Audits; effective January 1, 2025

QA/QC of Risk-Informed Drone Inspections (WMP.1192)

QA/QC of risk-informed drone inspections focuses solely on identifying potential fire and safety related hazards and is performed by an Inspection Supervisor.

Procedure: ESP 612: CMP Quality Assurance Audits; effective January 1, 2025

QA/QC of Wood Pole Intrusive Inspections (Transmission and Distribution) (WMP.1193)

For QA/QC of wood pole intrusive inspections, auditors are required to perform a field visit to visually verify inspector's documented results, evaluating the following: drill holes and plugs are recent and in good condition, inspection tags and reject tags are in place, pole data and identification tags are installed, severe damage is identified, trusses on reinforced poles are in good condition, and pole data consistency is maintained.

Additionally, the auditor uses a hammer to sound the pole and confirm that the pole does not exhibit an obvious hollow sound.

Procedure: Procedures are developed and maintained by third-party contractors that perform these inspections.

QA/QC of Substation Inspections (WMP.1194)

QA/QC of substation inspections is performed as outlined in SDG&E's internal procedures. Completed substation patrol inspections are periodically reviewed by a Construction Supervisor for quality control of regulatory requirements, relevancy, and internal considerations.

Procedure: 510.040 Substation Inspector Maintenance Order Reporting and Tracking; effective July 11, 2023

8.5.2.3 EQUIPMENT MAINTENANCE AND REPAIR

QA/QC of Corrective Maintenance Program (WMP. 1434)

Procedure: ESP 612: CMP Quality Assurance Audits; effective January 1, 2025

8.5.3 SAMPLING PLAN

8.5.3.1 GRID DESIGN AND SYSTEM HARDENING

QA/QC of Grid Hardening: Combined Covered Conductor (WMP.455), Strategic Undergrounding (WMP.473), Distribution Overhead System Hardening (WMP.475), Transmission Overhead Hardening (WMP.543), Transmission Overhead Hardening (Distribution Underbuild) (WMP.545), Advanced Protection (WMP.463), Early Fault Detection (WMP.1195), Strategic Pole Replacement Program (WMP.1189), and PSPS Sectionalizing Enhancements (WMP.461)

QA/QC measures are employed to provide assurances that WMP work is built in accordance with applicable codes, contracts, standards, and specifications, and complete a key milestone within the construction process. Therefore, a sampling rate of at least 95 percent is implemented for initiatives with substantive scopes of work in the HFTD to achieve satisfactory pass rates when incorporating calculated margins of error. These selected sampling rates in tandem with historical sample proportions produce satisfactory compliance rates for the risk profile associated with the facilities impacted by these WMP initiatives.

Applicable Electric Standard Practices (ESPs) are used to categorize the severity of observations identified during quality control processes. A 'passing' facility is characterized as a facility that is constructed without any priority or emergency observations, as defined in ESP 1028: Priority CMP Corrective Action Business Process (Level 4) and ESP 1031: Emergency CMP Corrective Action Business Process (Level 4).

The sample units used to generate pass rates are:

- For overhead facilities, the sample unit is defined as each pole within a job package that is impacted by the scope of the job, which typically features a single pole or structure (tower).
- For underground facilities, the sample unit is defined as each location within a job package that is impacted by the scope of the job (i.e., padmount facility [e.g., transformer, fuse cabinet, switch, etc.] or subsurface facility [e.g., manhole or handhole])

8.5.4.2 ASSET INSPECTIONS

For all asset inspection audit programs, the failure rate (if applicable to the program) and the types of issues missed are reviewed by the Program Management team and discussed with Inspection Supervision or Construction Supervision (for corrective action repairs). If the pass rate for the program is less than the targeted pass rate, further analysis is performed to determine whether it is a systemic concern or more focused on specific individuals. Subsequently, an appropriate corrective action plan is developed to provide additional training to the larger qualified inspector group or just on an individual basis.

QA/QC of Transmission Inspections (WMP.1191)

SDG&E does not define pass/fail of inspections due to the time between the initial inspection and the secondary assessment (QA/QC) activity, which can be a few days to several months depending on severity. Thus, the QA/QC is not determinative of whether an inspector passed or failed the initial inspection as conditions found during the secondary assessment may not have been present at the time of initial inspection.

QA/QC of Distribution Detailed Inspections (WMP.491)

For detailed distribution inspections and drone inspections, any changes made by the auditor to fire or safety issues (such as additions, modifications, or cancellations) result in an inspection failure. The number of failures in each process category is divided by the total number of inspections within the category to determine the failure rate for that audit process. The target pass rate for these inspection programs is 95 percent.

For additional, randomly selected audits, any potential fire or safety findings identified and validated during the audit are classified as an inspection fail.

QA/QC of Risk-Informed Drone Inspections (WMP.1192)

The audit sampling percentage for the Inspection Supervisor is 15 percent. If the success rate falls below 98%, the audit sample size will be reevaluated to consider a higher audit sample.

QA/QC of Wood Pole Intrusive Inspections (Transmission and Distribution) (WMP.1193)

8.6.2 PLAN FOR CORRECTING PAST DUE WORK ORDERS, IF APPLICABLE

Past due work orders as of December 31, 2024, are all are non-emergency or deferred work under reasonable circumstances per GO 95, primarily due to permitting delays and access issues. Open work orders are reviewed and prioritized monthly to minimize the need for deferrals. When necessary, deferred work in the HFTD is reassessed to determine if any issues have worsened or pose an imminent threat that requires immediate action.

8.6.3 PRIORITIZATION OF WORK ORDERS

Several factors are considered when prioritizing work orders including the severity of the damage, whether the issue is a potential safety or fire hazard, and the region the work is in (i.e. Tier 3, Tier 2, non-HFTD) Severity levels are determined at the time of the inspection, which corresponds to GO 95, Rule 18 priority levels that dictate the timeframe for remediation. See Section 8.4.2 Timeframe for Remediation.

In 2025, SDG&E will begin to assess open work orders with a risk-based approach to determine the impact that open conditions may have on customers impacted by potential PSPS de-energizations. Wind speed thresholds during a PSPS de-energization are influenced by open conditions on the grid, and in some cases may be reduced if warranted. For example, where the wind speed threshold for a healthy asset might be 45 miles per hour, it could be reduced to 35 miles per hour if there is damage present. Thus, SDG&E will begin to assess whether accelerating open work orders will decrease the number of potential customers impacted by PSPS de-energizations. See Section 13.3 Discontinued Activities and OEIS Table 13-1 for additional discussion.

8.6.4 PROCEDURE FOR MONITORING/REINSPECTING OPEN WORK ORDERS

For transmission inspection programs, Sections 5, 6.1 and 6.2 of~~TCM Maintenance Practice~~ TCM 807: Transmission Line Maintenance Practices ~~vG; Sections 5, 6.1 and 6.2~~ provide procedures for monitoring and/or re-inspecting open work orders. Additionally, patrollers reference previously submitted conditions in their mobile application and are provided with an open condition report when inspecting a tieline.

For distribution inspection programs with deferred work orders, reassessments may be performed in the HFTD to identify whether any issues have worsened or present an imminent threat that requires additional action. In addition, open corrective work orders may be reviewed prior to a weather event, such as a RFW, to reevaluate the severity of the issue and determine if the repair should be prioritized for completion prior to the event.

In some cases, the work order completion may be deferred due to factors such as permitting or environmental compliance. For example, Caltrans permit approvals typically take 6 to 12 months. If a deferral is needed, findings are reassessed to determine whether the severity of the issue does not support a delay in completion of the work order. Supervisors then monitor these locations and collaborate with Caltrans or other entities to expedite work order completion through an emergency process to mitigate any potential safety issues.

given the highest priority, after which resources are deployed to the incidents with the largest customer impacts.

SDG&E has multiple channels for detecting wildfire ignitions. Fire Coordination notifies appropriate personnel of incidents that may impact them in the service territory and Electric Troubleshooters are dispatched to any outage on the system detected through customer calls or advanced metering alarms.

The camera network is used to monitor the service territory and provide situational awareness year-round, with cameras panning to specific areas of interest during PSPS de-energizations or extreme weather events (see Section 10.4.1.2 Cameras (WMP.1343)). During the PSPS restoration phase, Contract Fire Resources (CFRs) are coupled with SDG&E crews as each circuit segment is restored to prevent ignitions and mitigate any ignition that occurs. All fire activities are coordinated with first responders and training is performed throughout the year to make sure there is efficient coordination during real world incidents.

SDG&E stages resources to minimize response times based on wildfire risk levels. During days with an FPI rating of Extreme or conditions that generally warrant a PSPS de-energization, staffing of emergency responders is increased around the clock and staff is placed in the areas of highest risk to minimize response times.

8.7.3 PERSONNEL WORK PROCEDURES AND TRAINING IN CONDITIONS OF ELEVATED FIRE RISK

8.7.3.1 WORK PROCEDURES DURING DIFFERENT LEVELS OF WILDFIRE RISK

Work activities and associated fire mitigations throughout the service territory are designated for specific FPI ratings (e.g., Normal, Elevated, Extreme, or RFW) as defined in Electric Standard Practice (ESP) 113.1 SDG&E Operations and Maintenance Wildland Fire Prevention Plan. As the fire potential increases in severity, activities that present an increased risk of ignition have additional mitigation requirements. Where risk cannot be mitigated, work activity might cease. All field personnel are required to be trained on SDG&E's fire prevention procedures annually. Fire prevention and safety are also discussed at pre-job briefings and are built into standard work practices. These standard practices are not exclusive to the HFTD and are implemented in all areas of the service territory where at-risk activities are performed adjacent to wildland fuels. The current and predicted FPI are publicly available on the SDG&E Weather app and through daily communications.

8.7.3.2 PROCEDURES FOR DEPLOYMENT OF FIRE PREVENTION AND IGNITION MITIGATION RESOURCES AND EQUIPMENT

Procedures and routine practices for working in areas adjacent to wildland fuels are detailed in ESP 113.1. Risk levels are determined by the FPI rating for that zone of the service territory.

The following summarizes the work activity guidelines for each Operating Condition:

- Normal Condition: Normal operating procedures are followed with baseline tools present at work sites, appropriate buffers between heat sources and flammable fuels, and equipment meeting appropriate standards.

up to the height of the conductors. Poles with exempt equipment are not subject to the pole clearing activity.

At its discretion, SDG&E may elect to retain certain vegetation within the required clearance area for pole clearing that is deemed to be exempt[52] from PRC §4292.

9.4.2 PROCEDURES

- Program Overview Guide; Version November 1, 2024
- Pole Clearing Activity, Version November 1, 2024
- Pre-Inspection Activity~~Pole Brush Pre-Inspectors/Auditors Procedures~~; Version November 1, 2024
- Pole Clearing Activity Vegetation Clearance Exemptions; Version January 3, 2025

9.4.3 SCHEDULING

Pole Clearing SWOs are generated within the PowerWorkz work management system according to the Pole Clearing Master Schedule, which identifies all utility poles to be cleared within each VMA and the scheduled start and finish dates. The SWO is the assigned work activity to the pole clearing contractor and includes all related pole assets in the VMA identified as requiring work. "Child" dispatch work orders (DWO) are created within the "parent" SWO and are assigned to the pole crew(s) working in the VMA. In aggregate, multiple DWOs comprise all the assigned assets within the SWO. After a pole is cleared, the pole clearance record is updated as complete in the database. After assigned work within a DWO is completed and records are updated, the contractor completes the DWO. Once assigned DWOs are completed, the contractor completes the SWO in the database. A pole may require multiple clearing activities within an annual cycle to maintain compliance.

The general pole clearing activities and timeframes to complete the assigned work are as follows:

- Herbicide assessment and customer notification: 2 to 3 months
- Herbicide application: 2 to 3 months
- Mechanical pole clearing: 4 to 5 months
- Re-clear pole clearing: 4 months

9.4.4 UPDATES

Since the 2023-2025 Base WMP, SDG&E has ceased performing pole clearing on poles with exempt equipment, such as hotline clamps (HLC). Previously, these poles were cleared as a discretionary measure, however, they are not required to be cleared under PRC §4292 and HLCs are on CAL FIRE's list of equipment exempt from pole clearing requirements. 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.

For a list of updated targets and a timeline for the 2026 to 2028 WMP cycle, refer to OEIS Table 9-2.

[52] See California Code of Regulations, Title 14, Section §1255.

9.8.6.2 PARTNERSHIP HISTORY

SDGE Table 9-4 details the history of the relationship with San Diego County Fire. Projects include the purchase of fire retardant. The poles/towers are the electric infrastructure included in the projects, and the miles are the length of roadway treated with retardant.

SDGE Table 9-4: San Diego County Fire Project History

Year	Amount	Projects	Miles	Poles/Towers
2019	$50K	1	3.5	47
2021	$50K	1	23.4	270
2022	$80K	1	3.5	47
2023	$60K	1	3.5	47
2024	$0	0	0	0
2025	$0	0	0	0

9.8.6.3 FUTURE PROJECTS

This is an ongoing partnership with no current projects but with the potential for future collaboration.

9.9 ACTIVITIES BASED ON WEATHER CONDITIONS

9.9.1 OVERVIEW

Vegetation Management internal staff and contractors receive daily weather reports including a weather forecast, current FPI rating, and other related information. This information is used to inform which activities are allowed to continue in the near term. For example, if a RFW, conditions warranting a PSPS de-energization, or extreme FPI is forecasted, Vegetation Management will cease most tree pruning and removal and pole clearing activities in the affected area(s). Inspection activities generally continue under these conditions as they do not carry the same risk and provide greater situational awareness and the ability to observe conditions that may warrant priority or emergency remediation. During Emergency Operations, Vegetation Management participates in contractor resource coordination, strategic staging of crews, and support of restoration activities.

9.9.2 PROCEDURES

- ESP 113.1 (SDG&E Operations & Maintenance Wildland Fire Prevention Plan); Version June 21, 2024

9.9.3 SCHEDULING

Planned, scheduled Vegetation Management activities generally cease during a RFW or other forecasted weather conditions that indicate an elevated fire risk. Work is scheduled based on allowable activities referenced in ~~Electric Standard Practice (~~ESP~~)~~ 113.1.

As a forecasted RFW or PSPS de-energization approaches, contracted tree crew resources may be proactively staged for dispatch at one or more of SDG&E's Construction & Operation Centers (Districts)

10.5.5 WEATHER STATION MAINTENANCE AND CALIBRATION

The Weather Station Maintenance and Calibration (WMP.1430) Program is dedicated to the maintenance and calibration of weather stations.

The Weather Station Network strategically positions weather stations to transmit data on sustained wind speed, wind gust, wind direction, temperature, and humidity every 10 minutes using cellular and spread spectrum communications. Although SDG&E does not have a set acceptable outage percentage, the stations have consistently maintained a 99 percent communication rate (data on weather station communication rates is reported in Table 3 of the QDR ~~table 3~~).

Reduced coverage does not increase risk due to the dense network of multiple stations on HFTD circuits and the presence of field observers in extreme circumstances.

SDG&E's challenging terrain can hinder maintenance visits and access to certain sites. In 2024, two stations were inaccessible for maintenance and calibration.

The network is essentially complete, representing every circuit within HFTD Tier 2-3. A few circuits in urban or coastal areas do not have weather stations due to a lack of practical need.

10.6 FIRE POTENTIAL INDEX (WMP.450)

10.6.1 EXISTING CALCULATION APPROACH AND USE

The FPI was developed to communicate the wildfire potential on any given day to promote safe and reliable operations. This 7-day forecast product, produced daily, classifies the fire potential based on weather and fuels conditions and historical fire occurrences.

The FPI reflects key variables such as the state of native grasses across the service territory ("green-up"), fuels (ratio of DFM component to LFM component), and weather (sustained wind speed and dew point depression). Each of these variables is assigned a numeric value and those individual numeric values are summed to generate a Fire Potential value from 0 to 17 that expresses the degree of fire threat expected for each of the 7 days included in the forecast. The numeric values are grouped into "Normal", "Elevated", and "Extreme".

The FPI first assumes that an ignition takes place and attempts to predict the susceptibility of the environment to support fire growth from that presumed ignition. There is a necessary assumption that the weather and fuels forecast will be accurate and that the fuel types and terrain characteristics are homogeneous. The result is a blanket FPI applied over a spatially diverse district.

Extreme FPI ratings are associated with an increase in the probability of the environment supporting large wildfires. To mitigate this risk, standard operating procedures may be modified or even cancelled during days with Elevated or Extreme FPI ratings.

FPI improvements have been realized with the recent implementation of a 1.5-kilometer WRF model, which is a significant improvement from the previous 2-kilometer gridded solution. This improvement resulted in a higher resolution of model inputs such as wind speeds, dryness of the air and the condition of grasses, dead fuels and live fuels.