



June 24, 2025

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**SUBJECT: Rejection and Resubmit Order for the San Diego Gas & Electric Company
2026-2028 Base Wildfire Mitigation Plan**

Mr. D’Agostino:

The Office of Energy Infrastructure Safety (Energy Safety) rejects the San Diego Gas & Electric Company (SDG&E) 2026-2028 Base Wildfire Mitigation Plan (2026-2028 Base WMP) submission dated May 2, 2025, and orders SDG&E to resubmit its 2026-2028 Base WMP, pursuant to Public Utilities Code section 8386.3(a). SDG&E’s 2026-2028 Base WMP does not conform to the requirements outlined in Energy Safety Guidelines, and a conforming plan must be submitted before Energy Safety can continue its substantive evaluation.

By July 11, 2025, SDG&E must submit a 2026-2028 Base WMP and revised annual WMP data submission that conform to the requirements in Energy Safety’s WMP and Data Guidelines.

Due dates for opening and reply comments on SDG&E’s resubmitted 2026-2028 Base WMP are set forth in the schedule below. Energy Safety will consider these, and the comments previously submitted for the initial May 2, 2025, version in its evaluation.

Reply comments must be limited to issues raised and representations made in the opening comments of other stakeholders. Opening and reply comments must be submitted to the 2026-2028 Wildfire Mitigation Plan docket (#2026-2028-Base-WMPs). Energy Safety’s Policy Division Process Guidelines provide more information on submitting opening and reply comments.

SDG&E Revised 2026-2028 Base WMP Due
Opening Comments Due

July 11, 2025
July 28, 2025

Energy Safety's Rejection and Order to Resubmit for the SDG&E 2026-2028 Base WMP

Reply Comments Due

August 7, 2025

Energy Safety Draft Decision Issued No Later Than

October 7, 2025

Sincerely,

A handwritten signature in black ink, appearing to read "Dunlap", with a stylized, cursive script.

Nicole Dunlap

Program Manager | Electrical Safety Policy Division

Office of Energy Infrastructure Safety

Encl: Rejection and Order to Resubmit for the SDG&E 2026-2028 Base WMP



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
REJECTION AND ORDER TO
RESUBMIT

SAN DIEGO GAS & ELECTRIC COMPANY
2026-2028 BASE WILDFIRE MITIGATION PLAN

June 24, 2025

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1. Introduction

The Office of Energy Infrastructure Safety (Energy Safety) rejects the San Diego Gas & Electric Company (SDG&E) 2026-2028 Base Wildfire Mitigation Plan (2026-2028 Base WMP) submission dated May 2, 2025. SDG&E's 2026-2028 Base WMP does not conform to the requirements in Energy Safety Guidelines.

SDG&E must provide a 2026-2028 Base WMP submission and revised annual WMP data submissions that conform to the requirements in Energy Safety's WMP and Data Guidelines. Section 5 of this document provides instructions and deadlines for SDG&E's resubmission.

2. Non-Conforming Elements

SDG&E's 2026-2028 Base WMP does not conform to the requirements provided in Energy Safety's WMP Guidelines. The following list outlines the requirements that SDG&E's 2026-2028 Base WMP submission did not follow, with examples of items SDG&E improperly omitted from its 2026-2028 Base WMP. The examples are for reference and are not exclusive.

1. SDG&E must revise its WMP to include accurate and consistent information in future submissions. For example:
 - a. SDG&E reported a target of 50 miles for its Strategic Undergrounding initiative (WMP.473) in its 2026-2028 Base WMP,¹ but provided 181 miles in its response to a data request² and updated it to 213 miles in its errata.³
 - b. SDG&E reported a target of 130 miles for its Combined Covered Conductor initiative (WMP.455) in its 2026-2028 Base WMP,⁴ but provided 45 miles in its response to a data request.⁵
 - c. SDG&E corrected its OEIS Table 9-8 "Number of Past Due Vegetation Management Work Orders Categorized by Age and Priority Levels" in response to a data request⁶ but updated its values again in its errata with switched values in the "High Priority" and "Low Priority" rows.⁷ In response to a data request later, SDG&E indicated the information in the errata was incorrect.⁸

¹ 2026-2028 Base WMP R0, Section 8.1.2, page 128.

² Response to DR 05 Attachment 2.

³ 2026-2028 Base WMP R0 Appendix G Errata.

⁴ 2026-2028 Base WMP R0, Section 8.1.2, page 128.

⁵ Response to DR 05 Attachment 2.

⁶ Response to DR 02, Question 6, page 12.

⁷ 2026-2028 Base WMP R0 Errata, page 232.

⁸ Response to DR 08, Question 3, page 5

- d. SDG&E provides inconsistent data between OEIS Table 6-1 and the Annual-WMP Data Submission Table 15. This includes differences in the circuit mileage length and respective risk scores of circuit segments.
2. SDG&E did not report “the same circuits, segments, or span IDs presented in Section 5.5.2” as in its “OEIS Table 6-4: Summary of Risk Reduction for Top-Risk Circuits.”⁹ SDG&E must report consistent circuits, segments, and span ID in both Section 5.5.2 and OEIS Table 6-4. SDG&E should also prioritize its overall utility risk in OEIS Table 6-4.¹⁰
3. SDG&E did not report the *risk reduction on the system* for its grid hardening activity correctly. Reporting risk reduction on a service territory-level, rather than circuit/segment level, is generally considered the best practice for electrical corporations. Throughout Section 8, SDG&E should report on the *risk reduction on the system* as a service territory-level risk reduction for its hardening activities.
4. SDG&E did not capture the complete scope of its Vegetation Management and Inspection programs. An electrical corporation must include all the activities “...addressing the risks that exist in the electrical corporation’s service territory.”¹¹ SDG&E must report all its Vegetation Management and Inspection programs within its service territory in the WMP.
 - a. In “OEIS Table 9-2: Vegetation Inspections and Pole Clearing Targets by Year,”¹² SDG&E provided a target for Detailed Inspection (WMP.494) within the High Fire Threat District (HFTD) only and indicated that the “Area Inspected” by Detailed Inspection in “OEIS Table 9-3: Vegetation Management Inspection Frequency, Method, and Criteria,” covered work within the HFTD only.¹³ SDG&E also discussed that the HFTD as the only area covered by Detailed Inspection in Section 9.2.1.1.¹⁴ However, SDG&E confirmed that Detailed Inspections occur in SDG&E’s self-designated Wildland-Urban Interface (WUI) and Coastal Canyon areas¹⁵ and its procedure document indicates that SDG&E performs Detailed Inspections on all circuits within its territory.¹⁶ SDG&E must include activities of Detailed Inspection outside HFTD in the discussion of Section 9.2 and update Table 9-3 to reflect all areas inspected by Detailed Inspection.

⁹ WMP Guidelines, Chapter III, Section 6.2.1.3, page 76.

¹⁰ 2026-2028 Base WMP R0, Section 6.2.1.3, page 116; Appendix F, pages 14-55.

¹¹ WMP Guidelines, Chapter II, Section 4.2.1, page 11.

¹² 2026-2028 Base WMP R0, Section 9.1.2, page 208.

¹³ 2026-2028 Base WMP R0, Section 9.2, page 209.

¹⁴ 2026-2028 Base WMP R0, Section 9.2.1.1, page 210.

¹⁵ Response to DR 02, Question 1, page 3.

¹⁶ SDG&E Vegetation Management Pre-Inspection Activity, pages 7-8.

- b. SDG&E reported a target for Off-Cycle Patrols (WMP.508) within the HFTD only.¹⁷ SDG&E indicated the “Area Inspected” during Off-Cycle Patrols is in the HFTD only in “OEIS Table 9-3: Vegetation Management Inspection Frequency, Method, and Criteria.”¹⁸ However, in response to a data request, SDG&E confirmed that Off-Cycle Patrols occur in its self-designated WUI and Coastal Canyon areas.¹⁹ SDG&E must include activities of Off-Cycle Patrols outside HFTD in the discussion of Section 9.2 and update Table 9-3 to reflect all areas inspected by Off-Cycle Patrols .
5. SDG&E did not use a unit of circuit miles for reporting quantitative inspections targets in “OEIS Table 9-2: Vegetation Inspections and Pole Clearing Targets by Year”²⁰ as required: “(t)argets for inspection activities (programs) of overhead electrical assets must use circuit miles as the unit.”²¹ SDG&E provided circuit miles in response to a data request.²² SDG&E must update its WMP to reflect the targets in circuit miles.
6. SDG&E must report activity-specific quantitative values for each activity in “OEIS Table 9-6: Vegetation Management QA and QC Activity Targets,” in separate rows.²³ SDG&E provided the required information in response to a data request and must update this information in its WMP.²⁴
7. SDG&E claimed that it discontinued the Community Tree Rebate Program (WMP.1326) in the response to a data request,²⁵ but did not discuss the reason in Section 9.7.4 of its WMP. As the Guidelines require that “the electrical corporation must describe changes to its integrated vegetation management activities since the last WMP submission and a brief explanation as to why those changes were made,”²⁶ SDG&E must discuss the elimination of the Community Tree Rebate Program with a brief explanation.
8. The WMP Guidelines require electrical corporations to include “separate overviews and operational flow diagrams for wildfires and PSPS events.”²⁷ SDG&E’s “Figure 11-2: Wildfire and PSPS Emergency Response Phases,” only covers an operational flow diagram for Public Safety Power Shutoffs (PSPS) events even though it labeled for

¹⁷ 2026-2028 Base WMP R0, Section 9.1.2, page 208.

¹⁸ 2026-2028 Base WMP R0, Section 9.2, page 209.

¹⁹ Response to DR 02, Question 2, pages 3-4.

²⁰ WMP Guidelines, Chapter III, Section 9.1.2, page 104.

²¹ WMP Guidelines, Chapter III, Section 9.1.2, page 104.

²² Response to DR 05, Question 7, page 14.

²³ WMP Guidelines, Chapter III, Section 9.11.1, page 118.

²⁴ Response to DR 02, Question 3, pages 7-8.

²⁵ Response to DR 02, Question 2, page 6.

²⁶ WMP Guidelines, Chapter III, Section 9.7.4, page 112.

²⁷ WMP Guidelines, Chapter III, Section 11.2.1, page 143.

both Wildfire and PSPS.²⁸ SDG&E must correct its Figure 11-2 to include both wildfire and PSPS, or provide a figure specific to wildfire.

9. SDG&E did not include the “Target Timeline” in “OEIS Table 11-4: Gaps and Limitations in Communication Coordination with Public Safety Partners.” As required by the WMP Guidelines, SDG&E must report the “Target Timeline” in the column of “Remedial Action Plan” in OEIS Table 11-4.²⁹

In addition, SDG&E’s WMP submission was due May 2, 2025. SDG&E was required to post its WMP, all documents cited and referenced in its WMP and include the website address of the postings in the cover letter of its WMP submission.³⁰ SDG&E did not complete posting of all documents cited and referenced in its WMP until June 6, 2025. SDG&E must ensure its future submissions and related website postings comply with the WMP Guidelines.

3. Additional Concerns

In its initial review and with the information provided in the current version of the WMP, Energy Safety identified some potential concerns in SDG&E’s 2026-2028 Base WMP. SDG&E should address these concerns according to the parameters provided herein.

1. The representations of costs and effectiveness used in SDG&E’s calculation where SDG&E is choosing and prioritizing undergrounding as a mitigation compared to alternatives is unsupported. SDG&E should adjust its assumptions to be more realistic, when compared to other electric corporations, or explain and provide support for its representations of costs and effectiveness. SDG&E should also use consistent approaches when measuring effectiveness between covered conductor and undergrounding.
 - a. SDG&E provided in a data request response that the average total cost per mile for covered conductor used for its cost benefit ratio assumptions was around \$2.7 million, while the total cost per mile for undergrounding used was around \$350 thousand.³¹ Typically, these costs are reversed.
 - b. SDG&E used an effectiveness for reducing overall risk of 58% for combined covered conductor, which includes additional equipment replacements and

²⁸ 2026-2028 Base WMP R0, Section 11.2.1.1, page 260.

²⁹ WMP Guidelines, Chapter III, Section 11.3.1, page 150.

³⁰ WMP Guidelines, Chapter II, Section 1.2, page 4.

³¹ SDGE DR Summary 20250612, SPD Data Request 1, Question 2, Attachment Q2b, sheet “lifecycle cost all territory”, averaging the values in Column N for covered conductor, Column O for undergrounding.

installations,³² compared to 99% for strategic undergrounding.³³ Previously, SDG&E estimated covered conductor alone to have an effectiveness of 64.5%,³⁴ which did not include the benefits of additional mitigations. Additionally, when considering benefits from early fault detection (EFD), falling conductor protection (FCP), and PSPS, SDG&E estimated a 97.78% reduction in risk.³⁵ SDG&E did not provide justification as to why it decreased its effectiveness estimates for covered conductor despite including additional mitigations. SDG&E also stated that it calculates the effectiveness for combined covered conductor based on the baseline condition of the asset,³⁶ but did not use the same methodology for undergrounding.

2. An electrical corporation must prioritize wildfire mitigation activities addressing the highest-risk circuits, segments, or spans within its service territory and design its risk evaluation process and wildfire mitigation strategies “to achieve maximum feasible risk reduction.”³⁷ SDG&E should plan its grid hardening targets to address the highest risk areas.
3. SDG&E discontinued its Distribution Infrared Inspection initiative (WMP. 481) and replaced it with other continuous monitoring technologies.³⁸ However, in 2024, no inspection was triggered by continuous monitoring technology for the 25 structures where conditions were identified by thermal technology, even though 23 out of the 25 structures are monitored by continuous monitoring technology (e.g., Power Quality sensors) at least at the substation or bus level.³⁹ Considering about one third of the structures in SDG&E’s HFTD are not covered by continuous monitoring technologies⁴⁰ and SDG&E lacks formal documented processes for initiating inspections triggered by continuous monitoring programs,⁴¹ SDG&E has not explained or provided support for the discontinuation of its Distribution Infrared Inspection program. SDG&E should demonstrate other technologies that can consistently identify thermal findings and comprehensively cover SDG&E’s HFTD or provide a plan to continue its Distribution Infrared initiative and set corresponding targets for Distribution Infrared Inspection.
4. SDG&E reduced its Risk Informed Drone Inspection initiative (WMP.552) targets to 6,500 annually in 2026-2028 Base WMP, which is a 52 percent reduction from its 2023

³² 2026-2028 Base WMP R0, page 131.

³³ 2026-2028 Base WMP, Section 6.2.1.2, page 111.

³⁴ 2023-2025 Base WMP, Section 8.1.1.3, page 152.

³⁵ MGRA Comments, SDGE Response MGRA-2026-8-04, Question 13.

³⁶ MGRA Comments, SDGE Response MGRA-2026-8-04, Question 9.

³⁷ WMP Guidelines, Chapter III, Section 6, page 60.

³⁸ 2026-2028 Base WMP R0, Section 8.3.10.1, page 171; Appendix D, pages 38-41.

³⁹ Response to DR 05, Question 2, pages 6-8.

⁴⁰ Response to DR 05, Question 3, page 9.

⁴¹ Response to DR 05, Question 4, pages 10-11.

and 2024 targets.⁴² The Risk Informed Drone Inspection initiative now covers only 7 percent of its HFTD/HFRA annually.⁴³ Given the Risk Informed Drone Inspections demonstrate the highest level 2 find rates among all inspection types,⁴⁴ and that level 2 conditions must be remediated within at least 6 months in the HFTD Tier 3 and 12 months in the HFTD Tier 2,⁴⁵ SDG&E should increase the targets to avoid level 2 conditions remaining unidentified and uncorrected in the HFTD by other inspection types.

4. Non-substantive Errata

On May 16, 2025, SDG&E submitted substantive and non-substantive errata to its 2026-2028 Base WMP.⁴⁶ On June 16, 2025, SDG&E submitted non-substantive errata to its 2026-2028 Base WMP.⁴⁷ SDG&E must include the following corrections, in addition to those provided in its May 16, 2025, errata, and June 16, 2025, errata, in the revised 2026-2028 Base WMP that SDG&E will file in response to this Rejection and Order to Resubmit.

Below are examples of non-substantive errata that SDG&E must correct in its 2026-2028 Base WMP. This is not a comprehensive list.

1. SDG&E must update the title row of “OEIS Table 8-1: Grid Design, Operations, and Maintenance Targets by Year” to reflect “2028 Total/Status.”⁴⁸
2. SDG&E must separate initiatives/activities into individual rows in “OEIS Table 9-5: Vegetation Management QA and QC Program Objectives.”⁴⁹
3. SDG&E must update footnote 3 in Appendix D to note the status of its Petition to Amend.⁵⁰

⁴² 2026-2028 Base WMP R0, Section 8.1.2, page 129.

⁴³ 2026-2028 Base WMP R0, Section 8.1.2, page 129.

⁴⁴ 2026-2028 Base WMP R0, Section 8.1.2, pages 124-130.

⁴⁵ 2026-2028 Base WMP R0, Section 8.4.2, pages 174-175.

⁴⁶ 2026-2028 Base WMP R0 Errata.

⁴⁷ 2026-2028 Base WMP R0 Non-substantive Errata.

⁴⁸ 2026-2028 Base WMP R0, Section 8.1.2, page 126-130.

⁴⁹ 2026-2028 Base WMP R0, Section 9.11.1, page 224.

⁵⁰ 2026-2028 Base WMP R0, Appendix D, page 34.

5. Conclusion and Next Steps

SDG&E must submit a 2026-2028 Base WMP to Energy Safety's 2026-2028 Base WMP docket (#2026-2028-Base-WMPs) that conforms to Energy Safety's WMP Guidelines, pursuant to the schedule below. SDG&E's resubmitted 2026-2028 Base WMP will be the subsequent version of its 2026-2028 Base WMP submission and must be named accordingly, e.g., SDG&E 2026-2028 Base WMP R1.⁵¹

Opening and reply comments regarding SDG&E's resubmitted 2026-2028 Base WMP must be provided in accordance with Energy Safety's Policy Division Process Guidelines. For SDG&E only (not for other electrical corporations), the schedule below supersedes the schedule published by Energy Safety on May 14, 2025.⁵²

The schedule for this Rejection and Order to Resubmit is as follows:

SDG&E Revised 2026-2028 Base WMP Due	July 11, 2025
Opening Comments Due	July 28, 2025
Reply Comments Due	August 7, 2025
Energy Safety Draft Decision Issued No Later than	October 7, 2025

SDG&E's submission of a 2026-2028 Base WMP that conforms with the submission instructions in Energy Safety's WMP Guidelines does not guarantee the approval of SDG&E's 2026-2028 Base WMP.

⁵¹ Policy Division Process Guidelines, pages 9-10.

⁵² 2026-2028 Base WMP Schedule.

APPENDIX A: Reference Table

Citation	Reference
#2026-2028-Base-WMPs.	Office of Energy Infrastructure Safety, 2026 - 2028 Electrical Corporation Wildfire Mitigation Plans docket , Accessed April 10, 2025, URL:(https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2026-2028-Base-WMPs).
2023-2025 Base WMP.	San Diego Gas & Electric Company, 2024-07-05 SDGE 2023 WMP R5 redacted , Published July 5, 2024, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56957&shareable=true)
2026-2028 Base WMP R0 Appendix G Errata.	San Diego Gas & Electric Company, SDG&E 2026-2028 Base-WMP Appendix G Supporting Data R0 , Published May 16, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58392&shareable=true)
2026-2028 Base WMP R0 Errata.	San Diego Gas & Electric Company, 2025-05-16 SDGE 2026-2028 Base-WMP Errata , Published May 16, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58513&shareable=true).
2026-2028 Base WMP R0 Non-substantive Errata.	San Diego Gas & Electric Company, 2025-06-16 SDGE 2026-2028 Base-WMP Non-substantive Errata , Published June 16, 2026, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58700&shareable=true)
2026-2028 Base WMP R0.	San Diego Gas & Electric Company, SDG&E 2026-2028 Base-WMP R0 , Published May 2, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58389&shareable=true).
2026-2028 Base WMP Schedule.	Office of Energy Infrastructure Safety, Second Revised 2026-2028 Base WMP Schedule , Published May 14, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58453&shareable=true)

Citation	Reference
Data Guidelines.	Office of Energy Infrastructure Safety, Data Guidelines , Published March 21, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58132&shareable=true).
MGRA comments.	Mussey Grade Road Alliance, MGRA Comments on SDGE 2026-2028 Base WMP R0 , Published June 13, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58684&shareable=true)
Policy Division Process Guidelines.	Office of Energy Infrastructure Safety, Policy Division Process Guidelines , Published February 24, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58025&shareable=true).
Response to DR 02.	San Diego Gas & Electric Company, SDGE Response OEIS-P-WMP 2025-SDGE-02 Q01-10 , Published May 21, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58457&shareable=true).
Response to DR 05.	San Diego Gas & Electric Company, SDGE Response OEIS-P-WMP 2025-SDGE-05 , Published May 21, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58520&shareable=true).
Response to DR 05 Attachment 2.	San Diego Gas & Electric Company, SDGE Response OEIS-P-WMP 2025-SDGE-05 Attachment 2 , Published May 21, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58518&shareable=true).
Response to DR 08.	San Diego Gas & Electric Company, SDGE Response OEIS-P-WMP 2025-SDGE-08 Q01-05 , Published June 4, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58590&shareable=true)
SDG&E Vegetation Management	San Diego Gas & Electric Company, SDG&E Vegetation Management Pre-Inspection Activity , Published November 1, 2024, URL:(https://www.sdge.com/sites/default/files/regulatory/Vegetation%20Management%20Pre%20Inspection%20Activity.pdf)

Citation	Reference
Pre-Inspection Activity.	
SDGE DR Summary 20250612	San Diego Gas & Electric Company, SDGE_DR Summary_20250612 , Published June 12, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58677&shareable=true)
WMP Guidelines.	Office of Energy Infrastructure Safety, Wildfire Mitigation Plan Guidelines , Published February 24, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true).

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