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VIA E-FILING

**Docket #2026-2028-Base-WMPs**  
**Docket #2025 Data Submissions**

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

**RE: San Diego Gas & Electric Company's Resubmittal of its 2026-2028 Base Wildfire Mitigation Plan and WMP Tabular Wildfire Mitigation Data**

Dear Deputy Director Marino:

Enclosed please find San Diego Gas & Electric's ("SDG&E") Resubmittal of its 2026-2028 Base Wildfire Mitigation Plan ("WMP") and WMP Tabular Wildfire Mitigation Data<sup>1</sup> as directed by the Office of Energy Infrastructure Safety's ("Energy Safety") Rejection and Resubmit Order for the San Diego Gas & Electric Company 2026-2028 Base Wildfire Mitigation Plan ("Order") issued on June 24, 2025.<sup>2</sup> As permitted by Energy Safety, SDG&E also made additional revisions to its WMP as noted in the table below. As instructed by the Order, SDG&E's resubmission is named "R1."

Upon receipt of the Order, SDG&E met with Energy Safety to further understand concerns related to the Non-Conforming Elements and Additional Concerns and to share additional insight on items raised by the Order. Based in part upon those discussions, SDG&E's WMP Resubmittal incorporates modifications to address Non-Conforming Elements, Additional Concerns, and non-substantive errata identified by Energy Safety as well as additional substantive and non-substantive changes identified by SDG&E. SDG&E's 2026-2028 WMP demonstrates the company's ongoing commitment to continuous innovation, enhanced understanding of risk, and cost-effective strategies to keep our customers, communities and employees safe from the risk of

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<sup>1</sup> SDG&E's revised 2026-2028 Base WMP (R1) and WMP Tabular Wildfire Mitigation Data (R1) are also available at SDG&E's website: <https://www.sdge.com/2026-2028-wildfire-mitigation-plan>

<sup>2</sup> Letter from Office of Energy Infrastructure Electrical Safety Policy Division Program Manager Nicole Dunlap to Brian D'Agostino, *Rejection and Resubmit Order for the San Diego Gas & Electric Company 2026-2028 Base Wildfire Mitigation Plan*, June 24, 2025. Available at <https://efiling.energysafety.ca.gov/Search.aspx?docket=2026-2028-Base-WMPs>

ignition or catastrophic wildfire. Safety is SDG&E's core value, and the tragic fires in Los Angeles earlier this year serve as a reminder to remain vigilant in the face of increased risk posed by an evolving climate.

SDG&E's grid hardening strategy is aimed at sustained and cost-effective reduction of wildfire risk through a risk-informed implementation of covered conductor and strategic undergrounding. Energy Safety has lauded SDG&E for its efforts to understand the risk on its system<sup>3</sup> and SDG&E thus wishes to clarify any misunderstanding that it is not targeting grid-hardening at its highest risk areas.<sup>4</sup> It is important to understand that two-thirds of the 2026-2028 WMP cycle is funded by SDG&E's Test Year (TY) 2024 General Rate Case (GRC) Decision,<sup>5</sup> which did not authorize SDG&E's requested grid hardening costs, resulting in a significant reduction of the scope of many mitigations across the WMP portfolio. The Decision is the primary driver for the lack of grid hardening mileage targets presented in the 2026-2028 Base WMP.

SDG&E's comprehensive approach to risk mitigation includes alignment of its risk assessment and strategy across multiple proceedings, including but not limited to the Risk Assessment and Mitigation Phase (RAMP) proceeding, SDG&E's TY 2024 GRC, the 2026-2028 WMP, and a potential SB 884 Electric Underground Plan (EUP) filing. For instance, in SDG&E's 2025 RAMP, recently filed in preparation for the upcoming TY 2028 GRC submission, the Company presented its risk assessment and future hardening strategy beginning in 2028. While future hardening efforts are included in this WMP cycle for the 2028 year, SDG&E notes that these targets remain subject to change based on the Commission's authorization of SDG&E's grid hardening forecasts in the GRC or another proceeding, such as the EUP filing, if applicable.

SDG&E's Resubmission includes revisions to Section 6 of the WMP that reflect SDG&E's sustainable long-term grid hardening strategy and further discusses elements of risk analysis and modeling that inform the strategy. This strategy prioritizes the riskiest circuit segments for hardening mitigations that are appropriate to the risk presented, even if they are not planned for implementation in the 2026-2028 WMP cycle. Precisely because these are the riskiest areas of the service territory, these segments are included in SDG&E's strategic undergrounding strategy. Based on SDG&E's risk modeling, alternative hardening approaches would leave an unreasonable amount of the risk on the system, and is not cost-effective or efficient because it could result in the potential need to revisit or re-harden these areas in the future. Appendix G of the WMP presents quantified elements of risk analysis including cost-benefit ratios, lifecycle costs, mitigation effectiveness, and expected risk reduction at the circuit-segment and system-wide levels.

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<sup>3</sup> Office of Energy Infrastructure Safety Decision San Diego Gas & Electric Company 2025 Wildfire Mitigation Plan Update October 2024 pages 17-20. Available at: <https://efiling.energysafety.ca.gov/Search.aspx?docket=2023-2025-WMPs>

<sup>4</sup> Order at 5.

<sup>5</sup> D.24-12-074.

SDG&E appreciates Energy Safety's thorough review of SDG&E's WMP and the opportunity to submit a revised version.

Respectfully submitted,

/s/ Laura M. Fulton  
Laura M. Fulton

Attorney for  
San Diego Gas and Electric Company

**Table of Rejection and Resubmit Order Non-Conforming Elements, Additional Concerns,  
and Non-substantive Errata**

<b>Item</b>	<b>Location of Issue and WMP Page Number</b>	<b>Nature and Reason for Change</b>
Non-conforming Element 1.a	OEIS Table 8-1; p.145, Appendix G	Revised Appendix G to reflect targets presented in OEIS Table 8-1
Non-conforming Element 1.b	OEIS Table 8-1; p. 145 Appendix G	Revised Appendix G to reflect targets presented in OEIS Table 8-1
Non-conforming Element 1.c	OEIS Table 9-8, p. 257	Corrected “Number of Past Due Vegetation Management Work Orders Categorized by Age and Priority Levels”
Non-conforming Element 1.d	OEIS Table 6-1; p. 89, Annual-WMP Data Submission Table 15	Corrected length in miles and risk scores of circuit segments
Non-conforming Element 2	OEIS Table 5-5; p. 62, OEIS Table 6-4, p. 134,	Presented consistent circuit segments in both OEIS tables
Non-conforming Element 3	OEIS Table 8-1, p. 145	Presented <i>system-wide</i> risk reduction
Non-conforming Element 4	OEIS Table 9-2; p. 235	Presented vegetation management targets for detailed inspections and pole clearing activities in the entire service territory
Non-conforming Element 5	OEIS Table 9-2, p. 235	Presented quantitative target unit for vegetation management activities as circuit miles
Non-conforming Element 6	OEIS Table 9-6, p. 252	Separated QA/QC initiatives for vegetation management activities
Non-conforming Element 7	OEIS Table 13-2, p. 329	Added discontinuation of Community Tree Rebate Program
Non-conforming Element 8	Figure 11-2, p. 293,	Created Figure 11-2 (separate from Figure 11-3) to specifically reflect Wildfire Emergency Response Phases

<b>Item</b>	<b>Location of Issue and WMP Page Number</b>	<b>Nature and Reason for Change</b>
Non-conforming Element 9	OEIS Table 11-4, p. 296,	Added target timelines to remedial action plans
Additional Concern 1.a	Section 6.1.1; p. 85, Section 6.1.3.1.1, p. 91, (including all tables and figures); Appendix G	Included additional explanation of lifecycle costs components and provided supplemental materials demonstrating assumptions and calculations.
Additional Concern 1.b	Section 6.1.3.3.5, p. 112, (including all tables and figures)	Revised to substantiate mitigation effectiveness for Combined Covered Conductor and Strategic Undergrounding.
Additional Concern 2	Section 1; p. 1, Section 6.1.1; p. 85, Section 6.2.1.3, p. 133	Included additional explanation for addressing highest risk areas in the 2026-2028 WMP cycle and in SDG&E's long-term hardening strategy
Additional Concern 3	Section 8.3.11, p. 192	Revised to substantiate discontinuation of Distribution Infrared Inspections
Additional Concern 4	Section 8.3.6; p. 180 OEIS Table 8-1, p. 145	Increased Risk-Informed Drone Inspections target
Non-substantive Errata 1	OEIS Table 8-1, p. 145	Updated title row to reflect "2028 Total/Status"
Non-substantive Errata 2	OEIS Table 9-5, p. 252	Separated QA/QC initiatives for vegetation management activities
Non-substantive Errata 3	Appendix D ACI SDGE-25U-06, p. 34	Reflected current status of Petition to Amend

**Table of SDG&E's Additional Revisions**

<b>Item</b>	<b>Location of Issue and WMP Page Number</b>	<b>Nature and Reason for Change</b>
1	OEIS Table 8-4, p.203	Created separate QA/QC targets for each Grid Hardening activity (similar to the separate QA/QC targets for Vegetation Management) as per Non-conforming Element #6)
2	Section 9.3, p. 238	Additional narrative provided for Right Tree Right Place activity (WMP.1325), which was omitted in error initially
3	Section 9.7, p. 242	Additional narrative provided for Land Services Vegetation Abatement activity (WMP.1327), which was omitted in error initially
4	Section 9.8, p. 243	Additional narrative provided for Fire Coordination Fuels Reduction activity (WMP.1328), which was omitted in error initially
5	OEIS Table 4-3, p. 24	Corrected “Number of Customers Hours of PSPS per Outage” and “Estimated Annual Decline in PSPS Events and PSPS Impact on Customers” (per Data Request MGRA-2026-8-04.Q04 and MGRA-2025-03.Q06)
6	OEIS Table 5-4, p. 55	Corrected OEIS Table 5-4, per DR OEIS-P-WMP_2025-SDGE-06: The data presented in OEIS Table 5-4 was incorrect and was revised to align with the information provided in SDG&E Table 5-4. In previous versions, Technosylva outputs included only estimates of acres burned and structures impacted. However, the latest model output now provides estimates for both acres burned and structures destroyed. Estimates of structures destroyed are used to estimate the number of serious injuries and fatalities.
7	Section 5.2.2.3, p. 41	Updated narrative on risk aversion
8	OEIS Table 6-3, p. 129	Updated mitigation effectiveness to align with changes in Appendix G
9	Section 6.1.3.1.4 (p. 98); SDGE Table 6-5 (p.99)	Reformatted table for improved clarity; updated costs also

<b>Item</b>	<b>Location of Issue and WMP Page Number</b>	<b>Nature and Reason for Change</b>
10	OEIS Table 8-1 (p. 145); OEIS Table 9-2 (p. 235); OEIS Table 10-1 (p. 264);	Updated risk reduction %'s in changes per Appendix G
11	Section 1, p. 1	Updated Executive Summary to emphasize the importance of adhering to the required regulatory process of risk assessment and the impact of the GRC decision on the implementation of our long-term gird hardening strategy.
12	Section 9.3, p. 238	Added activity narrative on Right Tree Right Place (WMP.1325) which was originally excluded due to elimination of a 2023-2025 Base WMP heading (High-Risk Species) in the 2026-2028 Base WMP guidelines. Activity now included in Section 9.3.
13	Section 9.7, p. 242	Added activity narrative on Land Services Vegetation Abatement (WMP.1327) which was originally excluded due to elimination of a 2023-2025 Base WMP heading (Fire-Resilient Right-of-Ways) in the 2026-2028 Base WMP guidelines. Activity now included in Section 9.7.
14	Section 9.8, p. 243	Added activity narrative on Fire Coordination Fuels Reduction Activities (WMP.1328) which was originally excluded due to elimination of a 2023-2025 Base WMP heading (Fire-Resilient Right-of-Ways) in the 2026-2028 Base WMP guidelines. Activity now included in Section 9.8.
15	Section 8.2.3.(p. 152); and related tables and narratives throughout the WMP	Edited narrative to reflect program name change from Strategic Pole Replacement Program to the Strategic Pole Remediation Program.
16	Section 8.7.3.2.2, p. 226	Edited activity narrative for Aviation Firefighting Program (WMP.557) to reflect the potential sale of the Sikorsky S-70M in 2026.
17	OEIS Table 3-3 (p. 17); Figure 3-1 (p. 17)	Edited table and figure to reflect updates in the financial costs for inclusion of non-

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		HFTD for Vegetation Management and the increase in Drone Inspection targets.
18	Section 9.3 (p. 238); OEIS Table 9-6 (p. 252)	Assigned Prune and Removal activity with ID WMP.1492 (as Enhanced Clearance has ID WMP.501)
19	Appendix D, ACI-25U-03, Table 4-1, p. 10	Corrected typo as the sentence in the table was inadvertently cut off when transferred to the document
20	Section 8.3.10 (p.190) and related tables and narratives throughout the WMP	Added new Transmission Switch Inspections activity(WMP.1509)
21	OEIS Table 9-1, p. 233	Revised qualitative target for Workforce Planning (Vegetation Management) (WMP.506) to be a more specific target
22	Appendix G – tab: README	Added README tab that will help the reader understand the process of calculating risk and mitigation cost, as well as provide mappings and locations of where to find important data and values. Removed color coding from tabs
23	Appendix G – tabs: SUG_vs_CCC, SUG_comp, CCC_comp	Renamed SUG_vs_CCC_2028 to SUG_vs_CCC and added all feeder segments to the comparison. Renamed SUG_2028_comp and CCC_2028_comp to align with this change.
24	Appendix G – tabs: SUG_comp, CCC_comp, SUG, CCC	Aligned units in cell L8 for long-term ongoing costs in cell K8 – all units for cell K8 now read M\$/mile-year.
25	Appendix G – tabs: SUG_vs_CCC_Plot	Added plots of CBRs by mitigation (SUG vs CCC) in order to visually represent the difference between the CBRs for SUG and CCC
26	Appendix G – tabs: SUG, SUG_comp, CCC_comp, SUG_vs_CCC	feeder segment scope to align with expected number of total OH miles planned to be SUG hardened in the 2006 –2008 cycle.  Reduced feeder segment scope to align with expected number of total OH miles planned to be SUG hardened in 2028. Specific change can be found in SUG tab in columns D (feeder segment) & H (OH miles). Change carries over to SUG_comp,

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		CCC_comp, SUG_vs_CCC, and SUG_vs_CCC_Plot tabs.
27	Appendix G – tabs: SUG&CCC_long_term_om_costs	Renamed tab SUG&CCC_Lifecycle_Cost to SUG&CCC_long_term_om_costs to better represent purpose of tab as dataset of long term operational mitigation costs. Renaming also reflected in index tab.
28	Appendix G	Changed the Last Update date in array M5:M11 in all mitigation tabs to reflect the actual date of the last update to workbook.
29	Appendix G	Renamed PV Risk Reduced Year 55 and PV Total Cost Capital + O&M Year 55 columns to PV Risk Reduced Year N and Total Cost Capital + O&M Year N to reflect differences in the number of years in the lifecycle estimates across all mitigation tabs. Columns in question commonly found in excel columns R, S, U, V, X, Y (2 per each discount rate) and may be shifted one left or one right for certain mitigations.
30	Appendix G – tab: CBR Summary By Risk	Expanded mitigation acronyms in excel columns A & C to better align with mitigation names in OEIS table 6-3.
31	Appendix G – tab: raw_WiNGS_Planning	Updated raw data from WiNGS to align with refined measurements of mitigation effectiveness.
32	Appendix G – tab: FeederSegment miles	Update recorded overhead secondary feeder segment miles to align with WiNGS planning model and OEIS tables 5-5, 6-1, and WMP annual table 15.
33	Appendix G – tab: RIDI	Edited poles in scope in excel column H to align with 9000 pole inspection target for 2026-2028.
34	Appendix G – tabs: Pole_Clearing, Off_Cycle_Patrol, Veg_Detail_Inspection	These vegetation management mitigations have been updated to include scoped circuit mileage, and their unit scopes have been adjusted to align with yearly targets.
35	Appendix G – tabs: Distribution_Underbuilt, OH Hardening, FCP	Modified yearly scopes to align with the target scopes as displayed in OEIS table 8-1.
36	Appendix G – tabs: SUG&CCC_long_term_om_costs	Updated long term mitigation operational costs to align with cost estimations.

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37	Appendix G – tabs: OH Detail Inspection	Updated pole counts in mitigation scope.