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Docket # 2025-IE

Patrick Doherty
Program Manager, Compliance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: SDG&E Comments on Independent Evaluator 2024 WMP Annual Report on Compliance

Dear Program Manager Doherty:

SDG&E hereby provides comments to the Independent Evaluator's (IE) Final Independent Evaluator Annual Report on Compliance (IE Report) on SDG&E's 2024 Wildfire Mitigation Plan (WMP) released on July 23, 2025. SDG&E appreciates the IE's conclusion that "SDG&E demonstrated a strong commitment to the WMP and has made significant progress in achieving the objectives and goals outlined for 2024" and acknowledgement that "unmet objectives were not simply failures but rather reflected a conscious decision to reallocate resources."¹ SDG&E respectfully requests that Energy Safety consider these comments when assessing SDG&E's compliance with its 2024 WMP.

I. COMMENTS TO SPECIFIC ITEMS WITHIN THE INDEPENDENT EVALUATOR REPORT

A. WMP.543, 8.1.2.5.2, Transmission Overhead Hardening

SDG&E disagrees with the conclusion that Transmission Overhead Hardening did not meet the risk reduction goal.² As stated in Section 5 of its 2024 ARC, SDG&E maintains that programs achieving 90% completion are considered substantially complete and met the intended risk reduction.³

¹ IE Report at p.119

² IE Report at p.23

³ SDG&E 2024 ARC at p.28

B. WMP.481, 8.1.3.3, Distribution Infrared Inspections

SDG&E disagrees with the IE's conclusion that the risk reduction goal was not met.⁴ SDG&E identified in its 2024 ARC that a review of program history determined that this inspection program yielded only a 0.2% find rate.⁵ Therefore, in 2024 the program targeted specific areas during peak load season, selecting structures based on a risk-informed strategy. This analysis lowered the number of inspections needed, while achieving comparable risk reduction.

C. WMP.552, 8.1.3.7, Drone Assessments

SDG&E disagrees with the IE's conclusion that the shortfall in reaching operational targets negatively impacted overall risk reduction.⁶ SDG&E identified in its 2024 ARC that the target was reevaluated to optimize the number of inspections based on further risk assessment.⁷ 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. The result of the evaluation optimized the target to achieve the intended risk reduction.

D. WMP.550, 8.1.4.6, Lightning Arresters

SDG&E disagrees with the conclusion that Lightning Arresters did not meet the risk Reduction.⁸ As stated in Section 5 of its 2024 ARC, SDG&E maintains that programs achieving 90% completion are considered substantially complete and met the intended risk reduction.⁹

II. CONCLUSION

SDG&E thanks Energy Safety for this opportunity to comment on the IE Report, and respectfully requests that Energy Safety and the IE take these recommendations into account when considering the report.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company

⁴ IE Repot at p. 22

⁵ SDG&E 2024 ARC at p.42

⁶ IE Report at p.86

⁷ SDG&E 2024 ARC at p.43

⁸ IE Report at p.24

⁹ SDG&E 2024 ARC at p.28