



September 16, 2025

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SUBJECT: Notice on Errata for the San Diego Gas and Electric Company 2026-2028 Base Wildfire Mitigation Plan

Mr. D’Agostino:

San Diego Gas and Electric Company’s (SDG&E) submitted its 2026-2028 Base Wildfire Mitigation Plan (2026-2028 Base WMP) to the Office of Energy Infrastructure Safety’s (Energy Safety) 2026-2028 Base WMPs docket (#2026-2028-Base-WMPs) on May 2, 2025.^{1,2} Energy Safety identified the substantive and non-substantive errors listed in Table 1 of this Notice on Errata for SDG&E to correct.

SDG&E submitted its substantive and non-substantive errata to its 2026-2028 Base WMP on May 16, 2025.³ SDG&E submitted its non-substantive errata to its 2026-2028 Base WMP on June 16, 2025.⁴ SDG&E submitted a revised 2026-2028 Base WMP in response to Energy Safety’s Rejection and Order to Resubmit to the same docket (#2026-2028-Base-WMPs) on

¹ San Diego Gas and Electric Company, [SDG&E 2026-2028 Base-WMP R0](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58389&shareable=true), Published May 2, 2025, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58389&shareable=true>).

² Office of Energy Infrastructure Safety, [2026 - 2028 Electrical Corporation Wildfire Mitigation Plans docket](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2026-2028-Base-WMPs), Accessed April 10, 2025, URL: (<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2026-2028-Base-WMPs>).

³ San Diego Gas and Electric Company, [2025-05-16 SDGE 2026-2028 Base-WMP Errata](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58513&shareable=true), Published May 16, 2025, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58513&shareable=true>).

⁴ San Diego Gas and Electric Company, [2025-06-16 SDGE 2026-2028 Base-WMP Non-substantive Errata](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58700&shareable=true), Published June 16, 2025, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58700&shareable=true>).

July 18, 2025.⁵ Following SDG&E’s resubmission, Energy Safety identified substantive and non-substantive errors that remain for SDG&E to correct.⁶

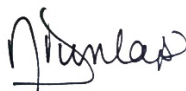
SDG&E must revise its 2026-2028 Base WMP R1 to correct the errors identified in Table 1, herein. SDG&E must submit its revised 2026-2028 Base WMP to Energy Safety’s 2026-2028 Base WMPs docket by September 30, 2025.

If SDG&E, during its review, identifies additional non-substantive errors (spelling, grammar, etc.), it may make corrections to its 2026-2028 Base WMP beyond those listed in Table 1. If SDG&E makes additional corrections, it must provide a list of each correction in its cover letter that will accompany its response to this Notice on Errata.

The schedule for this SDG&E Notice on Errata is as follows:

Revised SDG&E 2026-2028 Base WMP R1	September 30, 2025
Energy Safety Draft Decision or Revision Notice	
Issued No Later Than	November 21, 2025

Sincerely,



Nicole Dunlap
 Program Manager | Electrical Safety Policy Division
 Office of Energy Infrastructure Safety

Encl: Table 1: Errors in the SDG&E 2026-2028 Base WMP.

⁵ San Diego Gas and Electric Company, [SDG&E 2026-2028 Base-WMP R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58946&shareable=true), Published July 18, 2025, URL: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58946&shareable=true>

⁶ Office of Energy Infrastructure Safety, [2026 - 2028 Electrical Corporation Wildfire Mitigation Plans docket](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2026-2028-Base-WMPs), Accessed April 10, 2025, URL: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2026-2028-Base-WMPs>.

Table 1. Errors in the SDG&E 2026-2028 Base WMP R1

Section	WMP Page Number	Correction or Clarification
<p>Section 6 Wildfire Mitigation Strategy</p>	<p>N/A</p>	<p>SDG&E’s grid hardening targets in its 2026-2028 Base WMP R1 do not address its highest risk circuit segments.⁷ In its Reply Comments, SDG&E stated that the grid hardening targets set in its 2026-2028 Base WMP are based on its previous risk model versions - WiNGS 2.0 and 3.0 - whereas the risk scores/ranking provided in OEIS Table 5-5, OEIS Table 6-1, and OEIS Table 6-4 in the WMP are based on its current risk model version - WiNGS 4.0.⁸</p> <p>Additionally, the circuit segments in these tables are for the top 20 percent riskiest circuit segments by number of circuit segments, not by overall risk scores. In a Data Request response, SDG&E clarified that 10 of the 20 top risk circuit segments from WiNGS 3.0 have already had grid hardening implemented or that grid hardening of these circuits is in progress, and included an example of Circuit 1030 which further explained its undergrounding project design process.⁹</p> <p>In a Data Request response, SDG&E demonstrated that it utilized Protective Equipment and Device Settings (PEDS) implementation on its top 20 riskiest circuit segments as</p>

⁷ Mussey Grade Road Alliance, [MGRA Comments on PG&E 2026-2028 Base WMP Revision Notice Response](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59177&shareable=true), Pages 4-12, Published August 4, 2025, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59177&shareable=true>).

⁸ San Diego Gas and Electric Company, [2025_08_14_SDGE_ReplyComments_2026-2028_Base-WMP_R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59197&shareable=true), Pages 2-4, Published August 14, 2025, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59197&shareable=true>).

⁹ San Diego Gas and Electric Company, [SDGE Response OEIS-P-WMP_2025-SDGE-16_Q01-03](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59301&shareable=true), Question 01, Published August 27, 2025, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59301&shareable=true>).

Section	WMP Page Number	Correction or Clarification
		<p>an interim mitigation activity.¹⁰ However, SDG&E did not include any of this information in Section 6 of its Base WMP R1 when explaining why it did not scope the top risk circuits for grid hardening, other than briefly mentioning the Test Year (TY) 2024 General Rate Case (GRC) Decision in its Cover Letter for the 2026-2028 Base WMP R1.¹¹</p> <p>SDG&E must clarify in its WMP how it prioritizes its grid hardening projects in its top risk circuit segments using its older risk models. SDG&E must include the explanations and examples given in response to Data Requests and in Reply Comments to support its mitigation selection process in light of the TY2024 GRC Decision. These explanations must include, but are not limited to:</p> <ul style="list-style-type: none"> • A list of 10 of the 20 top risk circuits that have already had grid hardening implemented, • Updated versions of OEIS Tables 5-5, 6-1, and 6-4 with the top 20 percent riskiest circuit segments based on overall utility risk scores, • Updated versions of OEIS Tables 5-5, 6-1, and 6-4 using the WiNGS 2.0 and 3.0 risk ranking of top risk circuit segments compared to the WiNGS 4.0 risk ranking,

¹⁰ San Diego Gas and Electric Company, [SDGE Response OEIS-P-WMP 2025-SDGE-16 Q01-03](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59301&shareable=true), Question 3, Published August 27, 2025, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59301&shareable=true>).

¹¹ San Diego Gas and Electric Company, [2025-07-18 SDGE 2026-2028 Base-WMP Cover Letter R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58945&shareable=true), Published July 18, 2025, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58945&shareable=true>).

Section	WMP Page Number	Correction or Clarification
		<ul style="list-style-type: none"> • The Circuit 1030 example provided in response to OEIS Data Request 16, and • Discussion of PEDS coverage of its top riskiest circuit segments in Section 8.2.8.1 and Section 8.7.1 (as necessary), as provided in response to OEIS Data Request 16.
<p>Section 8.2.1.3 Impact of the Activity on Wildfire Risk</p>	<p>149</p>	<p>SDG&E stated, “the use of combined covered conductors results in a 46 percent efficacy in risk reduction.”¹² The 46 percent efficacy came from the Joint IOU Grid Hardening Working Group Report and represented a ten-year effectiveness estimate.¹³ This value is not consistent with the Combined Covered Conductor Mitigation Effectiveness reported in other parts of SDG&E’s WMP.</p> <p>SDG&E must update the mitigation effectiveness for combined covered conductors and ensure it is consistent with the value reported in the OEIS Table 6-3 and other sections of the 2026-2028 Base WMP (e.g. Section 6.1.3.3.5 Measuring Effectiveness of Mitigation Initiatives).</p>

¹² San Diego Gas and Electric Company, [SDG&E 2026-2028 Base-WMP R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58946&shareable=true), Page 149, Published July 18, 2025, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58946&shareable=true>).

¹³ San Diego Gas and Electric Company, [SDG&E 2026-2028 Base-WMP R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58946&shareable=true), Attachment A, Page 12, Published July 18, 2025, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58946&shareable=true>).

Section	WMP Page Number	Correction or Clarification
<p>Section 9.1.2 Quantitative Targets</p>	<p>235</p>	<p>SDG&E did not calculate the columns of “% HFTD Covered in 2026” and “% Risk Reduction” in OEIS Table 9-2 correctly, as required in the WMP guidelines.¹⁴</p> <ul style="list-style-type: none"> • The “% HFTD Covered in 2026” column must be calculated to reflect the percentage of assets located in the HFTD that are included in the Cumulative Quarterly Target 2026, Q4. <ul style="list-style-type: none"> ○ For example, if a Vegetation Management program Cumulative Quarterly Target 2026, Q4 includes all circuit miles within the HFTD, the “% HFTD Covered in 2026” would be 100%. Further explanation and an example calculation can be found on page 104 of the WMP Guidelines.¹⁵ • The “% Risk Reduction” columns must reflect the total risk reduced by all Vegetation Management activities included in the Cumulative Quarterly Target, Q4 for that year, regardless of whether the activity occurred inside or outside of the HFTD. An example calculation can be found on page 73 of the WMP Guidelines.¹⁶

¹⁴ Office of Energy Infrastructure Safety, [Wildfire Mitigation Plan Guidelines](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true), Published February 24, 2025, URL: (<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true>).

¹⁵ Office of Energy Infrastructure Safety, [Wildfire Mitigation Plan Guidelines](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true), Published February 24, 2025, URL: (<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true>).

¹⁶ Office of Energy Infrastructure Safety, [Wildfire Mitigation Plan Guidelines](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true), Published February 24, 2025, URL: (<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true>).

Section	WMP Page Number	Correction or Clarification
		<p>SDG&E must update its calculations for the columns "% HFTD Covered in 2026" and "% Risk Reduction" reflecting the correct approach.</p>
<p>Vegetation Management and Inspections</p>	<p>N/A</p>	<p>The names of the vegetation management procedures documents listed in SDG&E’s 2026-2028 Base WMP do not match the names of the documents posted on SDG&E’s website. For example, the WMP lists "Program Overview Guide," which appears to correspond with the "Vegetation Management Overview Guide" posted on SDG&E’s website.</p> <p>SDG&E must update the names of the vegetation management procedures documents to be consistent between its WMP and its website.</p>