CEJA Comments on Wildfire Mitigation Plans, R.18-10-007
<u>Attachment 3</u>: SDG&E Data Request Responses

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QUESTION 1:

California Executive Order N-05-19 requires consideration of "socioeconomic factors and vulnerable populations that exacerbate the human toll of wildfires" when CAL FIRE develops a "[m]ethodology to assess which communities are at the greatest risk from wildfire and the projects within/nearby areas that would reduce the threat of a catastrophic wildfire if completed." When developing your prioritization for hardening the grid, have you considered "socioeconomic factors and vulnerable populations that exacerbate the human toll of wildfires"? If you have, please describe how these factors were considered in the evaluation of how to prioritize projects to harden the grid. If you have not, please describe why these factors have not been considered and any plans you may have to consider these populations in the future.

RESPONSE 1:

In terms of prioritization, of the variety of activities that SDG&E undertakes to reduce wildfire risk, only a handful of activities can be prioritized in the usual sense. Most activities are either: a) universally applied within tiers of the High Fire Threat District (HFTD), or b) are situationally dependent upon conditions, such as weather. Neither a) nor b) consider socioeconomic situations. An example of a) is vegetation management, which is carried out with the same standards across all of Tier 3 of the HFTD. An example of b) is the Public Safety Power Shutoff program (PSPS) where areas of high wind and elevated fire risk are considered and depends on real-time situational awareness.

However, a few capital projects do get prioritized by the order of completion. For example, the Fire Risk Mitigation (FiRM) program is prioritized initially by the usage of the Wildfire Risk Reduction Model (WRRM). The raw output of WRRM is then considered to find efficient groupings of electric infrastructure to upgrade. WRRM creates its priorities by both analyzing the likelihood of equipment failure and estimating fire growth at a location if an ignition were to occur. The fire growth modeling does consider human impacts.

Similarly, the Pole Risk Mitigation and Engineering (PRiME) program and Wire Safety Enhancement (WiSE) program predominately rely on likelihood failure and consequence with no bias toward socioeconomic factors. These programs may utilize the WRRM mentioned above to assist in prioritizations.

Date Received: February 14, 2019
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QUESTION 2:

As described by California Executive Order N-05-19, how do you define populations that are at the greatest risk from wildfires due to socioeconomic factors?

RESPONSE 2:

SDG&E has not created such a definition, however, it is likely that populations at greatest risk are those communities affected by wildfires that ignite in the HFTD. These communities include all those within the HFTD as well as those communities that are adjacent to the HFTD – sometimes referred to the Wildland Urban Interface. Factors that may further differentiate these populations are not necessarily based on socioeconomic factors but on risk concerns such as fire suppression abilities, evacuation routes, communication infrastructure, and the availability of electricity.

CEJA DATA REQUEST: CEJA-SDG&E-01
R.18-10-007 – SB901 WILDFIRE MITIGATION PLAN OIR
SDG&E RESPONSE
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QUESTION 3:

Your plan includes Community Resilience Centers. Do your Community Resilience Centers include: transportation for community members that do not have access to transportation, filtered air if outside air quality is poor, and plans to work with community organizations and translators to ensure that hard-to-reach and linguistically isolated populations are aware of these centers.

RESPONSE 3:

SDG&E's Wildfire Mitigation Plan (WMP or Plan) discusses Community Resource Centers, which are not Community Resilience Centers. SDG&E's Plan at page 62 states: "As a result of community meetings held in the most at-risk communities in SDG&E's service area, SDG&E established Community Resource Centers (CRCs) [to assist] those communities in real time during extreme weather events." These CRCs are powered by portable generation supplied by SDG&E and provide such things as: water, snacks, cell phone charging, and up-to-date information on outages as well as provide the community affected a place to congregate.

While SDG&E does not offer transportation to an activated CRC, these centers were intentionally located within the communities being affected. The CRCs are opened and activated during a PSPS event impacting that specific community but are not open when a wildfire is present and air quality would be an issue. In the event of a wildfire, SDG&E would work with the Red Cross to open emergency evacuation centers located outside an affected area. The intent of a CRC is for temporary support absent an emergency or nearby wildfire.

Further, SDG&E plans to contact community-based organizations it partners with who serve non-English speaking residents. SDG&E will provide these organizations with its translated fire/emergency preparedness information.

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QUESTION 4:

With respect to community outreach, how do you plan to conduct outreach to community members who do not speak one of the languages that the material is available in and do not have ready access to the internet? Do you plan to work with community-based organizations to reach populations that have been hard to reach? Do you plan to host community meetings? Where do you plan to host community meetings in 2019?

RESPONSE 4:

SDG&E is preparing written materials that provide understanding about the dangers of wildfire, how to prepare and become more resilient to the potential of wildfire and the aspects of PSPS in English, Spanish, and the three most prevalent after English and Spanish. English and Spanish versions are currently available and the other three languages are currently being developed.

As stated in response to Question 3 above, SDG&E plans to contact community-based organizations it partners with who serve non-English speaking residents. SDG&E will provide these organizations with its translated fire/emergency preparedness collateral, including information about its PSPS program and CRCs.

SDG&E has already begun outreach efforts to communities in the HFTD. These meetings are a follow-up to the meetings where SDG&E developed the CRC concept for use during a PSPS event (see also SDG&E's WMP, page 62). In addition, late in 2018, SDG&E began to develop a more in-depth plan to meet with and develop resiliency plans with the same communities that SDG&E met with and developed the CRC concept from. This plan includes dedicated employees whose focus will be meeting with and joining the various planning groups, fire safe councils, CERTs, and other community groups that provide a basis for SDG&E to reach all customers in the communities affected on a more one-on-one basis. These employees will both host and, as SDG&E has already noted, become part of the organizations it seeks to interact with. Specific communication plans are already underway.

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QUESTION 6:

With respect to back-up generators for mitigating the impacts of de-energization, what technologies are you examining for back-up generators?

RESPONSE 6:

SDG&E intends to implement Backup Power for Resiliency projects, providing back-up power to critical infrastructure, through the use of one or multiple technologies which are currently under evaluation. Such technologies may include but are not limited to, the use of energy storage, renewable and/or non-renewable power generation, and advanced controllers.

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QUESTION 1:

What percentage of your customers in Tier 2 or Tier 3 areas do not speak on of the five languages into which you plan to translate your outreach material?

RESPONSE 1:

SDG&E does not have records related to the exact languages that its customers prefer. SDG&E uses Claritas data rankings to identify the primary languages people speak in its region, which is then applied to SDG&E's outreach communications.

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QUESTION 3:

In the event of a wildfire, what plans do you have to ensure that customers impacted by the wildfire are aware of it? Do you have plans for linguistically isolated community members? Do you have plans if the cell-phone tower goes down?

RESPONSE 3:

During wildfires, SDG&E uses its Emergency Notification System (ENS) that activates outbound communications to impacted customers based on their communications preference (email, phone, and/or text). Email accounts we have on file will be used in situations when cell-phone towers go down. SDG&E has a library of pre-recorded messages (verbal and written) used to communicate with customers, and SDG&E also creates custom messages during an event when needed. SDG&E uses its social media channels and website to keep customers informed. Important messages are amplified through proactive communication with local TV, radio, and print media outlets.

SDG&E's in-language safety communications will be part of our education efforts before an event happens. Currently, SDG&E does not have the ability to send out multiple language messages during a wildfire event.

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QUESTION 5:

With relation to ignitions caused by equipment failure that are discussed in your plan, have you done any analysis of how effective inspections have been in identifying equipment that may fail? For example, was any of the equipment that caused an ignition identified in an inspection before the ignition as needing replacement? If so, please identify the percentage of equipment that was identified as needing replacement before the ignition. Do you expect the ability of inspections to identify problematic equipment to change with the inspection plans described in your Plan?

RESPONSE 5:

Visual and intrusive inspections are an important component of SDG&E's wildfire risk mitigation efforts. SDG&E's inspection programs are effective as they identify thousands of condition codes each year, which generate work orders to repair or replace the damaged equipment. An example of this would be a cracked cross arm. As cross arms age, they occasionally begin to crack at or through the bolt connection to the pole, or at the bolt connections to dead ends or insulators. When these cracks get larger, the bolts which are under tension from the line could get loose leading to a wire down failure. Visual inspections find these conditions so that needed repairs, such as the cross arm in this case, are performed before equipment fails, which reduces the risk of an ignition. Another example is the wood pole intrusive inspections that bore into the base of poles to check for pole deterioration at and below grade. If poles are found with decaying condition, they are identified for replacement or reinforcement. SDG&E's plan includes QA/QC inspections for the Tier 3 HFTD in addition to its General Order 165 compliance inspections. This increased inspection frequency will allow SDG&E to identify physical deterioration of equipment earlier in the areas of highest risk.

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QUESTION 15:

Are all trees of "at risk" or "reliability" species within the "strike zone" of utility equipment planned for trimming or removal? If arborist discretion is to be used, what factors will be used to determine which trees will be trimmed or removed, and what approximate fraction of "at risk" or "reliability" tree species will be trimmed or removed as enhanced vegetation management is implemented?

RESPONSE 15:

All trees that SDG&E has identified to be "at risk" or "reliability" that fit the criteria of dead, diseased, dying or structurally defective during the most recent inspection are planned to be trimmed or removed within the scheduled tree operations. The discretionary factors that are applied to determine whether a tree is trimmed or removed may include: 1) where the defect is located on the tree; 2) how much of the tree requires work to abate the hazard; 3) the remaining structural integrity of the tree; 4) safety of the tree worker; 5) customer preference; 6) environmental impact. It is estimated that approximately 90% of enhanced vegetation management will involve trimming and 10% will involve removals.

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QUESTION 17:

How many instances of outages due to vegetation contact or fall-in occurred over the last five years for circuits using covered conductor or "tree wire"? How many ignitions? What is the rate per deployed mile of vegetation-caused outages and vegetation-caused ignitions for covered conductor? How does this compare to bare conductor?

RESPONSE 17:

Currently, SDG&E has over 5 miles of covered conductor installed in its service territory and 5 miles of tree wire installations. SDG&E is not aware of any instances of tree-related outages or ignitions involving covered conductor or "tree wire" over the last five years.