BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018)	R.18-10-007 (Filed October 25, 2018)

REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) ADDRESSING ITS 2021 WILDFIRE MITIGATION PLAN UPDATE

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INTRODUCTION

Pursuant to Rule 11.1 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, San Diego Gas & Electric Company (SDG&E) files its reply comments addressing its 2021 Wildfire Mitigation Plan Update (WMP or Plan).

I. Introduction and Summary

In September 2018, Senate Bill (SB) 901 was signed into law.[1] SB 901 enacted legislation on a range of issues related to catastrophic wildfires in California, including detailed statutory provisions requiring electric utilities to file WMPs.[2] SDG&E filed its Wildfire Mitigation Plan on February 5, 2021. While it is impossible for any WMP to eliminate all risk of wildfires or all risk of ignitions associated with utility infrastructure and/or operations, SDG&E has developed what it considers to be a best-in-class Wildfire Mitigation Plan Update that meets or exceeds industry standards and applicable Commission and statutory requirements. But SDG&E also intends to continually improve its fire safety and wildfire risk mitigation efforts over time through the ongoing WMP process. While rate impacts and cost recovery are separate

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1 SB 901, Stats. 2017-2018, Ch. 626 (Cal. 2018).

2 SB 901, among other things, amended California Public Utilities Code (P.U. Code) § 8386 to require electrical corporations to "annually prepare and submit a wildfire mitigation plan to the commission for review and approval, according to a schedule established by the commission." P.U. Code § 8386(b).

from the WMP Update approval process, SDG&E continues to emphasize that adequate funding is critical to these improvements. While undoubtedly wildfire mitigation comes at a cost, SDG&E's Wildfire Mitigation Plan programs are proposed with an eye toward efficiency and balancing the need to mitigate risk with reasonable cost. But costs associated with the plan should not hinder its ultimate approval and remain subject to a separate cost recovery proceeding, such as a future General Rate Case (GRC).

II. Affordability, Cost Variance and Recovery

The Utility Reform Network (TURN), in its opening comments[3] on the electric utility WMPs states that the Commission must view affordability as a constraint when reviewing the WMPs. (TURN comments at 1.) TURN further argues that final guidance on the WMP should clarify that going forward, the GRC is the venue for recover of wildfire mitigation costs, and requests that the Commission clarify that, in the case of any divergence between an approved WMP and the programs approved in a final GRC Decision, the utility's cost recovery is bound by the program budget and unit costs approved in the GRC Decision. (TURN comments at 7.) SDG&E generally agrees that the GRC, or a proceeding on a separate application, is where costs should be reviewed and approved. Circumstances may arise that warrant seeking cost recovery through a different proceeding, and the Commission should allow utilities the flexibility to pursue appropriate cost recovery mechanisms where necessary.

Catastrophic wildfires continue to threaten communities and the environment. In fact, the scale and scope of California wildfires in 2020 occurred at an unprecedented level, leading to deaths and the destruction of property and natural resources. The California Department of

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[3] Citations to party opening comments filed on March 29, 2021 are cited as follows: [party short form name] comments at [page number(s)].

Forestry and Fire Protection's (CAL FIRE) website reports that the 2020 August Complex Fire burned over one million acres, making it the largest wildfire in California history.[4] In fact, five of the six largest fires in California history occurred in 2020.[5] Even though many of these major fires were not linked to utility equipment, the consequences of these fires reinforce the continued importance of taking dramatic action to mitigate the risk of climate change-driven catastrophic wildfires in California, including potential utility-caused wildfires. SDG&E has several initiatives and continue to innovate more ways to mitigate the risk of such events. These initiatives require investment, resources, and planning. The cost incurred by these wildfire mitigation initiatives are important to keep our communities safe.

Risk Spend Efficiencies (RSE) inherently take the balance of safety and cost into account. SDG&E uses RSEs to inform risk mitigation efforts, precisely to avoid the possibility of unnecessarily high costs that might results from an overly broad approach to mitigation. The RSE analysis allows a targeted mitigation strategy based on the risk reduction per dollar. For that reason, SDG&E uses RSE outputs as a key input in making wildfire mitigation investment decisions.

Similarly, with respect to costs, the Public Advocates Office (Cal Advocates) states that the WSD should require future WMPs to explain any substantial variation in cost forecast between annual WMP filings. (Cal Advocates comments at 25.) SDG&E provides this information in its Annual Compliance Report. Cost forecasts may vary for a number of reasons. Year over year changes sometimes occur based on timing/scheduling of projects. SDG&E also delineates such information at a higher level through its General Rate Case showing.

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4 CA.gov, CAL Fire, available at https://www.fire.ca.gov/incidents/2020/.
5 *Id.*

The Small Business Utility Advocates (SBUA) requests that SDG&E be required to report on bill impacts for all ratepayer classes, including small commercial customers. (SBUA comments at ii and 2.) SBUA further argues that SDG&E should modify its policy for non-residential customers so that bill adjustments for small commercial customers mirrors the policy for residential customers. (SBUA comments at 4.) As previously addressed, the WMP does not constitute a request for rate recovery and as such, the WMP is not the appropriate place for forecasting or providing illustrative rate impacts. And issues such as bill adjustments are better addressed in venues outside the WMP approval process.

III. Risk Management

Mussy Grade Road Alliance (MGRA) states that the fires being simulated are smaller than typical "catastrophic" wildfires that cause damage. MGRA takes issue with the investor-owned utilities' choice to limit the duration of fire simulations to 8 hours. Specifically, "[t]he net effect of smaller simulated fires is to artificially shift the calculated risk towards utility infrastructure proximate to population centers, and to downplay the risk of ignitions in remote areas that grow into major fires before descending as a broad front into wildland urban interface areas." (MGRA comments at 12.)

SDG&E's election to cap the fire simulation times is due more to technical aspects of wildfire modeling rather than an intentional attempt to shape outcomes. SDG&E understands that a capped duration time does have implications to the data, and that large fires can spread and cause significant damage after the 8 hour window. SDG&E is actively working with fire behavior models to overcome limitations of the duration cap.

MGRA also states that the "utilities and WSD should validate that the wildfire size distribution produced by Technosylva in the run periods defined by the [investor-owned utilities]

IOUs adequately reproduces the wildfire size distribution of real fires. This can be demonstrated with a log-log plot of cumulative fires versus the fire size." (MGRA comments at 47.)

SDG&E agrees that it is important to review wildfire model outputs to understand the accuracy of the modeling. This can be done both by evaluating the general distribution of outputs, as MGRA has described, and also by comparing modeled wildfires to actual wildfires. This comparison is regularly conducted by SDG&E Subject Matter Experts. For example, when there is a potential wildfire on the landscape, SDG&E Fire Coordinators and Fire Scientists examine the wildfire behavior predicted by the model, looking at specific elements of the wildfire environment such as the fuel moistures and weather conditions in the vicinity of the fire. If it is determined that the environmental conditions were not modeled correctly, then the subject matter experts can adjust the environmental conditions in real-time to improve the performance of the model. After close examination of many wildfires, model biases and trends are identified, which help focus and support continuous overall improvements to the model.

To address MGRA's concerns that SDG&E simply selects the "worst case" from multiple fire spread simulations, (MGRA comments at 60-62) SDG&E has plans to incorporate various wind and vegetation conditions more fully into its system hardening models. The "worst case" scenarios are a conservative approach to understanding wildfire risk and are a strong proxy to that risk. But the current usage of the extreme values is temporary and part of the end state of wildfire modeling.

And with respect to MGRA's recommendation that the "WSD start a working group to study ignition and fire spread modeling," (*id.* at 62.) SDG&E is supportive of collaborative efforts to further improve its risk modeling. Such collaborative efforts are already underway in various forms and can be further explored in established proceedings such as the S-MAP.

IV. Conditional Approval

SDG&E disagrees with TURN's position that a utility's WMP should only be deemed approved once it has met all identified conditions in full. (TURN comments at 4.) That position is inconsistent with P.U. Code Section 8386.3, which requires the WSD to "approve or deny each [WMP] within three months of its submission…." Further, WMP approval is a condition to issuance of a Safety Certification under P.U. Code Section 8389(e) – one of the most important features of Assembly Bill 1054 – and it would be detrimental to all stakeholders to create uncertainty around the Safety Certification process. Indeed, in its June 25, 2020 letter regarding the "2020 Safety Certification Process – Stakeholder Comments and Supplemental Guidance," WSD specifically recognized that "Commission ratification of the [WSD]'s approval of an electrical corporation's 2020 [WMP], subject to the conditions specified in Appendix A of the ratifying resolution, constitutes document of an approved WMP pursuant to Pub. Util. Code § 8389(e)(1)."[6] Moreover, the WMP is updated annually, and there are scenarios and valid reasons where work may not be completed in full in one year. For example, work may be deferred or shifted to other programs to achieve the maximum risk reduction. The approval should be based on the reasonableness and completeness of the Plan.

V. System Hardening and Undergrounding

With respect to TURN's concerns regarding the difference between the various utilities' use of covered conductor, (TURN comments at 34-35) SDG&E began studying the use of

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[6] Wildfire Safety Division's letter soliciting Stakeholders input to the 2020 Safety Certification request - WSD 2020 Safety Certification Process - Stakeholder Comments and Supplemental Guidance (June 25, 2020), available at https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organization/Divisions/WSD/WSD%202020%20Safety%20Certification%20Process%20-%20Stakeholder%20Comments%20and%20Supplemental%20Guidance.pdf.

covered conductor on its system several years ago to ensure the technology would work with its system and that safe operating procedures and standards were put in place prior to beginning installations. After completing these tasks, SDG&E used an early version of its Wildfire Next Generation System (WiNGS) tool to identify circuit segments where utilizing covered conductor would be most beneficial. In 2020, SDG&E completed its first covered conductor installation, hardening approximately 1.9 miles of line. This installation was a success and SDG&E intends to ramp up its efforts utilizing covered conductor to 20 miles in 2021 and 60 miles in 2022.

TURN also argued that SDG&E should be required to provide detailed data concerning the components and costs of its covered conductor programs, including asset-level data, and to justify the replacement of all wood poles and other useful assets based on valid engineering and risk analyses. (TURN comments at viii and 44-47.)

SDG&E has a practice to replace wood poles in the HFTD with either steel or fiberglass poles. The main driver for using these materials is to mitigate against high winds damaging wood poles and other powerline equipment, which could in turn cause fire risk. Steel and fiberglass poles are built in a factory that ensure consistent material properties. The material properties of wood can vary because it is grown and not manufactured. By installing steel or fiberglass poles, SDG&E has more confidence that the pole will be able to withstand the designed environmental events. In addition, pole replacements are often necessary due to different sag and clearance requirements of the new wire being strung. SDG&E often installs new poles that are 5-10 feet taller than the existing pole. Another benefit is that steel and fiberglass poles are built with materials that are heat resistant. Should a pole be exposed to a wildfire, a steel or fiberglass pole will be more likely to withstand the heat, thus increasing SDG&E's ability to bring the services

back on in the area with reduced impact. Wood poles have an increased likelihood of being damaged or destroyed during a wildfire.

Engineering analysis including pole loading calculations is also conducted for all new covered conductor installations. If SDG&E finds an existing steel or fiberglass pole is adequate to support the new covered conductor (including clearances and pole loading) the pole will not be replaced.

Contrary to Cal Advocates' position that the Commission should further assess the efficiency of SDG&E's hardening mitigations, SDG&E is in fact using its resources appropriately to obtain the greatest feasible reduction in wildfire risk. (Cal Advocates comments at 16.) The greatest feasible reduction in wildfire risk would be achieved if SDG&E deployed an all-underground strategy. While that strategy can offer great risk reductions, it also comes at the highest cost. As such, SDG&E is being thoughtful in its approach and looking for areas where it makes sense to underground and areas where covered conductor provides sufficient risk reduction.

As noted, SDG&E has been using risk-informed methodologies to support its decision-making. In its earlier wildfire mitigation efforts, SDG&E developed and used models such as the wildfire risk reduction model (WRRM) to inform asset hardening projects by targeting highest risk assets in the service territory. This targeted approach to risk mitigation will continue through the lens of its latest WiNGS model which allows for more comprehensive and more advanced alternatives analysis to identify the most optimal solutions from a cost benefit standpoint. The WiNGS model will further improve efficiency of spend because of its ability to inform more targeted mitigation approaches.

Cal Advocates also states that the WSD should direct SDG&E to focus its strategic undergrounding program and covered conductor programs on high-risk circuits. It requests that

WSD direct "SDG&E to submit detailed workplans, with an explanation of how the plan optimizes SDG&E's resources to expeditiously and substantially reduce wildfire risk." (Cal Advocates comments at 17.)

SDG&E has discussed in detail its risk reduction modeling and how segments are chosen for hardening. SDG&E also provided workpapers to Cal Advocates to demonstrate the circuits that are in scope for strategic undergrounding and provide detailed cost estimates.[7] SDG&E has also stated that by incorporating the new WiNGS model, the impacts of both wildfire and Public Safety Power Shutoff (PSPS) will be taken into account when selecting projects moving forward, which should lead to a significant ramp-up with strategic undergrounding. It is not feasible for SDG&E to forecast specific circuits out beyond the next few years. SDG&E will continue to evaluate the highest-risk circuits and areas where strategic undergrounding provides the most impact, but it remains important to maintain flexibility so that SDG&E may shift focus should conditions change. Additionally, SDG&E's prior hardening efforts have largely focused on the highest risk circuits and as such, many of the top circuits from a fire risk standpoint have largely been hardened to some extent. SDG&E's models take the current level of hardening into account when evaluating additional mitigations for those high-risk areas. As SDG&E continues to develop its models and refresh its analysis, it will continue to evaluate additional needs to further mitigate those areas.

Cal Advocates also observes that the cost forecasts in SDG&E's 2021 WMP Update vary substantially from those provided in SDG&E's 2020 WMP for some system hardening programs (Cal Advocates comments at 20.). In the 2021 WMP SDG&E discussed the WiNGS model

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[7] Cal Advocates Data Request: CALPA-SDGE-04 (submitted March 4, 2021) at 5 and workpaper CalPA-SDGE DR4 Q3 and Q4.

which was developed in 2020. The WiNGS model takes into account both wildfire risk reduction and PSPS impact reduction when analyzing project alternatives. The inclusion of PSPS impact was new for SDG&E in 2020. The previous model, WRRM, only looked at the wildfire risk reduction when analyzing projects. This change in scope to address the impacts of PSPS on our communities led to the introduction of more covered conductor and undergrounding projects being scoped moving forward.

SDG&E also provided Cal Advocates a full explanation of the changes to the scope of its covered conductor program and forecast costs.[8] As explained in its data request responses, the unit costs for covered conductor are not varying. It is not as simple as dividing the costs by the mileage completed that year. The perceived variance in unit cost between 2020, 2021, and 2022 is due to the variation in the volume of construction costs and engineering and design costs. The engineering and design required for the underground jobs occurs months before construction and may be reflected in the costs of the year prior to when it is energized. In addition, to the extent pre-construction activities begin in a year prior to the year it is forecasted to be energized, those costs would also show up in the year prior to energization. For example, in 2021, SDG&E forecasts 25 miles of energized lines, however, the forecasted costs of $120.26M in 2021 reflects the design and engineering for the increase in scope for 2022.

For 2020, the $38.83M value is based on actual spend. This value is more refined compared to the rough estimates considered for 2021 and 2022 because it is based on actual design, engineering, and project specific conditions and requirements. But for 2021 and 2022, the estimates are based on unit cost value and fixed mileage target rather than actual project specific conditions and requirements. In addition, the overall forecast budget value is not solely

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[8] *Id.* at 7, and workpaper CalPA-SDGE DR4 Q3.

related to the target miles to be energized for the year. Rather it also includes remaining mileage design, mileage to be energized, mileage design for next year, and early construction for next year's mileage goal. Other factors that resulted in cost variation from the 2020 actual values versus the 2021 and 2022 estimates are due to scopes being high level and still subject to change depending on field conditions encountered during surveys, field walks, as-builts verifications, potholing and Geotech explorations, and actual construction.

Cal Advocates also suggests that The WSD should require the large IOUs to provide specific workplans showing where and when mitigation work will take place. (Cal Advocates comments at 27.)

It is redundant and burdensome to require SDG&E to provide specific workplans for where and when mitigation work will take place for all programs. SDG&E and the other large IOUs already file the Quarterly Data Report (QDR) to show what work was completed, and where it was completed in a geodatabase.

VI. Standby Power Program and PSPS

SDG&E disagrees with Cal Advocates argument that the WSD should direct SDG&E to phase out the Standby Power Program, which it claims does not effectively reduce wildfire risk. (Cal Advocates comments at 18.) The Standby Power Program reduces the impacts of PSPS to customers. It is important to maintain a diverse set of solutions to optimize risk reduction (Wildfire and PSPS) in the near term and long term. SDG&E's strategies aim to mitigate both wildfire and PSPS risks and require the consideration of backup power options where grid hardening strategies may take longer or are not cost-effective for certain areas that may still be impacted by shutoffs.

SDG&E's Standby Power Programs target customers and communities that will not directly benefit from other current grid hardening programs. Since these customers reside in the backcountry and are so widely distanced from one another, SDG&E's grid hardening initiatives are unlikely to reduce the PSPS impacts to this subset of customers. The intention of this program is to help certain customers (who have experienced a PSPS event in the past and reside in the HFTD) in becoming more resilient to PSPS events.

Furthermore, with respect to the Standby Power Program, SBUA states that SDG&E should be required to streamline the permitting process for commercial customers, in collaboration with local jurisdictions, and to address the extended permitting and installation processes involved. (SBUA comments at 3.) SDG&E understands the importance of operationalizing back up energy solutions for all its customers as expeditiously as possible, while maintaining existing safety standards and protocols. As such, during 2020, SDG&E did in fact streamline the permitting process for SPP through a collaborative process directly with the County of San Diego. Through the creation of standardized installation packages, the permitting process was reduced, on average, from six weeks to two weeks. Understanding some commercial sites will fall outside of the standard scope, thus requiring a customized solution and likely longer permitting times, SDG&E will continue to work with the County on enhancements to the overall process.

SBUA further argues that SDG&E should propose how generators using renewable resources will provide reliable service during wildfires and power outages. (SBUA comments at 6.) SDG&E remains committed to exploring all feasible options when considering back up power options for customers. When sized appropriately, renewable options can be just as effective as those powered by gasoline/propane sources. SDG&E remains committed to

balancing solutions that are both cost effective and environmentally conscious, understanding that limitations may occur. All sites that are considered for green alternatives will undergo a fully customized design to ensure the solution is adequately sized to keep critical loads operational during a PSPS event. SDG&E will also offer education to these customers, helping them understand how to get the most out of the system capacity through proper energy conservation measures.

PSPS remains an important tool in mitigating the risk of catastrophic wildfires. Because the scope of the WMP is only through 2022, the WMP Update is not aimed at eliminating public impacts of PSPS, as noted in MGRA's comments. (MGRA comments at 71.) Rather, during the WMP timeframe, SDG&E is employing several mitigations to reduce the impacts of PSPS in addition to our grid hardening efforts. SDG&E still has over 2,800 miles of unhardened overhead distribution infrastructure that will need to be prioritized for hardening.

MGRA also takes the position that WSD should investigate the use of de-energization for mitigation against catastrophic fire growth potential alone (without respect to ignition potential). (MGRA comments at 72-73.) SDG&E utilizes its Fire Potential Index (FPI) to understand when PSPS events may take place. PSPS events typically occur during extreme FPI conditions, and SDG&E has established through our data that the chance of an ignition during extreme FPI is 4.3 times greater than during normal conditions. SDG&E is considering the elevated probability of ignition along with the impact of the ignition when these decisions are made. The wind speed data and Vegetation Risk Index help drive the real time decision making in an effort to limit the scope of the PSPS only to those areas that see the highest risks.

Moreover, SBUA states that SDG&E should provide information on safety inspections done prior to restoring service and how circuits are prioritized for power restoration, like Southern California Edison Company's (SCE) WMP does. (SBUA comments at 5.)

SDG&E's 2021 WMP Update Section 8.2 describes the process for prioritizing and restoring service during PSPS events as follows:

> *High winds, low relative humidity, and other unfavorable weather conditions can increase the risk of wildfire in some of the communities that SDG&E serves. As explained in the preceding sections, SDG&E has spent more than a decade enhancing its wildfire safety program, which includes hardening its infrastructure, and building a fire science and meteorology department to better forecast and prepare for wildfires. Even with all of the investments to reduce the risk of wildfire, there may be times when SDG&E still has to shut off power to electrical circuits to protect public safety, which is a decision that SDG&E's does not take lightly. During windy conditions, flying debris can damage power lines and create sparks that could cause ignition. Depending on the severity of the weather and other factors, PSPS-related outages can last between a few hours to multiple days. Thus, restoring power to customers can be a long process.*
>
> *During the course of the event, SDG&E has a dedicated PSPS prioritization team. The goal of this team is to evaluate the current operating conditions to establish priorities during the event to ensure proper order of operations and resource alignment. The prioritization team in conjunction with Meteorology team, the Emergency Operations Center and other operational units determines the orders-of-priority for inspection of circuits and re-energizing those circuits to restore power to SDG&E customers. The prioritization team considers many data elements during the development of the prioritization plan, such as the weather conditions, critical customers and facilities, field resource availability, impacts to SDG&E electric infrastructure, and the duration of outage. The prioritization team in partnership with the Resource Coordination team ensures appropriate resources are planned to support inspections, to make critical repairs and restore customers in a safe manner.*
>
> *Re-energization takes place after the SDG&E weather network shows that wind speeds have decreased, and the forecast does not indicate that the wind speeds will re-accelerate above certain thresholds. SDG&E requires 4–8 hours of daylight for SDG&E field crews to inspect lines to determine whether there is any damage and deem it safe to restore power. When the crews are inspecting, they are looking for safety hazards such as debris,*

downed lines, broken hardware, tree branches caught on the line, or issues related to communication wires. If there is any damage to the power lines or poles, repairs must be made first before power can be restored.

It is difficult to predict the time needed to conduct an inspection, given the terrain and varied length of each power line, access to SDG&E facilities may hinder inspection by foot and whether aerial inspections are required. Some circuits are located in rural, mountainous areas that require a helicopter to inspect. In those cases, wind speeds need to be below 35 mph in order for the helicopter to fly safely. In other cases, patrol can be made by foot or vehicle. The amount and severity of damage found during inspections may also affect restoration times. Once a line has been inspected and all damage has been repaired, the lines are then safely re-energized.

SBUA supports SDG&E's proposal to utilize microgrids as a cost-effective means to reduce the need for PSPS events. SDG&E should report on the number of non-residential customers that will be served by each microgrid, like SCE. (SBUA comments at 2.)

SDG&E is supportive of including this information in future filings.

VII. Asset and Vegetation Management Inspections

Cal Advocates states that utilities should strive to complete asset inspections and vegetation management inspections before fire season begins around August 1st of each year, and that if it is not feasible to complete 100 percent of the work by this date, utilities should be required to target at least 75 percent completion, prioritizing the highest-risk areas of their systems. (Cal Advocates comments at 28.)

SDG&E Vegetation Management performs its annual work following a master schedule of activities within the Hight Fire Threat District (HFTD) and non-HFTD. Each activity (inspection, trim, audit) is performed within its respective monthly schedule. The service territory is sub-divided into 133 Vegetation Management Areas (VMA). All trees located within the HFTD are inspected twice annually. The second inspection within the HFTD occurs

approximately 6 months following the routine inspection schedule. As an example, a VMA whose routine inspection occurs in September each year received its off-cycle inspection the following March. The twice-annual inspection frequency allows for a prioritization of required work within the HFTD prior to the fall/winter Santa Ana fire season.

SDG&E disagrees with MGRA's suggestion that the utilities should be required to complete and circulate common definitions, methodologies, timelines, data standards and assumptions regarding "at-risk" species and criteria for Enhanced Vegetation Management (EVM), and to circulate it for public comment. (MGRA comments at 42.) SDG&E developed its "at-risk" species list based on several components including known growth rates, tree failure characteristics and outage history. Growth rates are determined at the species level but are also based on site-specific and environmental conditions. Similarly, common tree failure characteristics are generally known by species, but are also informed by assessing each specific tree's health, pruning history, location, etc. Tree species located in different parts of the state may share similar attributes. But there are many local and environmental variables such as soil type, moisture, slope, altitude, weather, insects, fire history, cultural practices etc., that impact a tree's growth and overall health. Each utility within the state will likely have unique species and conditions that determine their "at-risk" classification. Because vegetation management is subject to nature and the conditions listed above, uniform definitions as suggested by MGRA may not ultimately be helpful. SDG&E also notes that most of the tree inspections which occur during the routine activity are performed by International Society of Arboriculture (ISA) Certified Arborists. All the off-cycle, enhanced inspections of trees located within the HFTD are performed by ISA Certified Arborists.

VIII. Outreach and Communications

SBUA states that for the Generator Assistance Program (GAP), SDG&E should be required to (1) provide incentives to residential and small business customers who experienced a power outage in HFTD zones, (2) continue targeting low income customers with enhanced rebates, and (3) in addition to CARE customers, SDG&E should offer enhanced rebates to customers for "hard-to-reach" customers, both residential and small commercial. (SBUA comments at 3.) Consistent with these recommendations, SDG&E offers incentives in the form of rebates for individuals who have experienced a recent PSPS outage. SDG&E also offers an enhanced rebate to CARE customers because SDG&E is able to determine its CARE customers based on their account information. SDG&E will continue offering small business and residential customers a basic rebate that can cover up to 60-75% of the cost of a generator. But SDG&E does not have the information necessary to identify whether a business owns or leases their property, and thus an enhanced rebate offer is not feasible for that situation.

SDG&E agrees with SBUA's recommendations regarding "hard-to-reach" customers (SBUA comments at 4) and plans to continue to prioritize providing outreach and communications to customers who are "hard-to-reach." SDG&E will also continuously evaluate the effectiveness of various channels and messaging to reach these customers. Effective and frequent communication with "hard-to-reach" populations and customers, including those with access and functional needs (AFN), tribal, and non-English speaking communities continues to be a priority for the Company. In 2021, SDG&E will be enhancing and expanding its outreach and communications efforts as part of its wildfire safety public education campaign to help inform and prepare customers for the upcoming wildfire season. SDG&E will solicit feedback from these targeted groups in 2021 and will use the findings to refine and improve

communications, messaging and outreach. Additionally, SDG&E plans to utilize its partnerships with community-based organizations to connect with "hard-to-reach" customers.

Also consistent with SBUA's recommendation that SDG&E should also utilize mobile resource centers to reach impacted customers as not all customers may have the capacity to travel to resource centers, (SBUA comments at 6-7) SDG&E's community resource center (CRC) program uses Tactical Command Trailers to support any additional needs beyond the stationary locations. In the event of a widespread weather event where the need surpasses internal ability to support, SDG&E will procure additional resources such as trailers. The Tactical Command Trailers and supplemental resources are staged at strategic locations near impacted areas.

While SBUA argues that the Division should require all the IOUs to explore the need for 24/7 centers and how they can safely operate them, (*id*. at 11) SDG&E has consistently filed comments in post event reports showing data that clearly supports consideration of reducing operating hours, not an expansion. The intent of a Community Resource Center is not 24/7 customer support but, rather temporary support. Thus 24/7 CRC support is unnecessary. Given safety and health concerns, having residents seeking refuge outside their homes in a facility that is not conducive to overnight stays, is not practical.

Furthermore, CRCs are intended to provide temporary resources to PSPS impacted communities. As such, SDG&E recommends that strategies to reasonably support medical baseline and access and functional needs (AFN) populations should be incorporated into CRC planning, but should not be a substitute for personal comprehensive preparedness plans. SDG&E reiterates that while CRCs provide temporary support resources, all customers with AFN or medical-related needs should have a preparedness plan in place in advance of a de-energization

event or any other disruption of service. It is not realistic to expect a CRC to provide all necessary resources for these populations, considering the temporary and dynamic nature of PSPS events, coupled with the variety of AFN or medical-related needs that may occur. SDG&E has partnered with 2-1-1 San Diego and 2-1-1 Orange County to refine its CRC program and to identify additional means of providing assistance to those who identify as AFN and are registered Medical Baseline customers. SDG&E also works with the AFN Statewide Council and regional PSPS Working Groups to identify and implement new CRC strategies to support AFN customers. For example, as a result of feedback received in the AFN Statewide Council, SDG&E has added privacy screens at all CRCs and is conducting AFN and Americans with Disabilities Act (ADA) surveys of each CRC location to identify enhancements to better serve the access and functional needs community.

Moreover, SDG&E recognizes the importance of ensuring CRCs are equipped with resources to address the needs of the customers that visit CRCs during de-energization events, but it is not reasonable to require electric utilities to provide any and all services at CRCs that are deemed necessary by local and tribal governments. The Joint Community Choice Aggregators (CCAs) offer a list of potential CRC services that includes, among others, beds with electric power for medical equipment, transportation to medical care, and showers. SDG&E submits that CRCs are not the appropriate place for these offerings. Through its partnerships with community-based organizations (CBOs) and support models with local 2-1-1 organizations, Jewish Family Services, and Facilitating Access and Coordinated Transportation (FACT), SDG&E is able to provide more appropriate resources (e.g., hotel vouchers, accessible transportation) to address needs for items such as showers, transportation, and sleeping accommodations.

IX. Technical Workshops

TURN states that the WSD/Commission should require that the utilities and staff, in collaboration with all stakeholders, hold technical workshops over the course of 2021 in order to improve and standardize the risk analyses for covered conductor so as to better understand the significant differences in the risk spend efficiency results for covered conductor installation among the utilities, and the differences in the program activities and costs of the covered conductor installation programs among the utilities. (TURN comments at 36.) Cal Advocates also suggests that in the summer (after approving or denying the current WMPs), the WSD should convene a technical working group to examine the risk models discussed below and others that the utilities rely on. (Cal Advocates comments at 29.)

While SDG&E generally agrees that workshops and working groups often provide an important forum for educational awareness and a place to discuss opportunities for improvement, SDG&E notes that workshops are held to demonstrate the risk models after the WMP is filed each year. To the extent additional workshops would provide additional value, SDG&E supports them. With respect to covered conductor specifically, SDG&E provides detail in its 2021 WMP update on how the risk reduction for covered conductor is calculated. Covered conductor is a relatively new program for SDG&E and will continue to evaluate the program to get more detailed information on the costs and benefits. The costs and benefits of covered conductor may vary across IOUs based on the terrain of the system, and the amount of pole changeouts required to install covered conductor.

X. Other

Protect Our Communities Foundation's (PCF) assertion that the Commission should either limit the scope or term of SDG&E's 2021 WMP update because of San Diego's pending

franchise agreement choices is outside the scope of the WMP approval and should not be considered at this time. (PCF comments at 16-17.)

Moreover, Cal Advocates concerns regarding SDG&E's SCADA switches are misplaced. (Cal Advocates comments at 25-26.) As stated in SDG&E's response to CalPA DR4 (SDG&E response to question 11), SDG&E's SCADA system is 98% reliable.[9]

Additionally, Cal Advocates suggestions that in future non-spatial data filings, SDG&E should provide a comprehensive accounting of the number of inspections performed in the HFTD across all inspection programs, and the number of findings by type from each inspection, in order to provide a complete picture of the effectiveness of SDG&E's inspection portfolio, is redundant. (Cal Advocates comments at 27.) SDG&E already provides a detailed account of HFTD inspections on a quarterly basis within the spatial Quarterly Data Report. The initiative – asset inspection log related table contains a field to identify if a compliance finding was identified as part of the inspection. SDG&E provides a line-by-line accounting of each inspection performed within the HFTD during the previous quarter as part of the QDR. Providing this information in multiple reports on the same reporting cadence is overly burdensome and could ultimately result in confusion.

MGRA states that SDG&E should ensure that its use of 30 second weather station data to provide alerts for PSPS accounts for and triggers alerts for potential periodic wind gusts with a period greater than a few minutes. (MGRA comments at 78.) SDG&E Meteorologists have been able to leverage the 30 second weather station data to further enhance the overall understanding of Santa Ana Wind behavior and how the winds impact our communities on a sub-circuit level. SDG&E does not have specific thresholds that are used as a PSPS trigger, rather, there are alert

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[9] Cal Advocates Data Request: CALPA-SDGE-04 (submitted March 4, 2021) at 20.

speeds that are established based upon historical wind speeds that establish the climatological extremes for each weather station and corresponding circuit segment. On several occasions, 30 second weather station data has been a major contributing factor to powerlines not being de-energized because of the short-lived natures of the strong winds, which previously were undetectable. For example, during a PSPS in December of 2020, post event analysis determined that there were over 20,000 customers that reached the climatological alert speeds for PSPS, though 30 second weather station reads indicated that wind gusts in these areas were short-lived and isolated, preventing PSPS for these customers.

Moreover, MGRA states that the WSD should work with utilities and stakeholders to identify which elements of its Geographic Information Systems (GIS) templates are confidential and which can be released to the public. Utilities should be required to release public GIS data along with quarterly updates. (*Id.* at 85.)

SDG&E provided a comprehensive mapping of each of the fields that are confidential within its GIS Quarterly Data Status Report. In addition, SDG&E submitted a request to the WSD along with its quarterly data report on WMP-spatial and non-spatial data (QDR) submitted on February 5, 2021 covering October 1 to December 31, 2020 to modify the file geodatabase structure to include a confidentiality flag in each feature class of the reporting requirements. SDG&E believes that this structural modification to the reporting criteria will enable the IOU's and WSD to differentiate between confidential and non-confidential information once data has been input into the WSD file geodatabase template.

XI. Conclusion

SDG&E urges the WSD to approve its 2021 Wildfire Mitigation Plan Update as soon as possible.

Respectfully submitted,

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