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VIA EMAIL

Wildfire Safety Division
California Public Utilities Commission
300 Capitol Mall
Sacramento, CA 95814

Re: Comments on Wildfire Safety Division Staff Proposal and Related Workshop on Wildfire Mitigation Plan Compliance Process

Dear Wildfire Safety Division,

Pursuant to the guidance provided by the Wildfire Safety Division (WSD),¹ San Diego Gas & Electric Company (SDG&E or Company) submits these comments on the WSD's proposal (Staff Proposal) and workshop related to Wildfire Mitigation Plan (WMP) compliance process. SDG&E appreciates the WSD's Staff Proposal, and it also appreciates the information presented in the workshop and the opportunity to provide these comments. SDG&E generally agrees with the WSD's proposed compliance process and provides the following comments on recommendations or issues that could be further improved, modified or clarified.

Staff Proposal and Workshop on Wildfire Mitigation Plan Compliance Process

The Staff Proposal defines the WSD's annual compliance period as one year from the approval date of the WMP.² The WSD also contemplates ongoing compliance assessments that occur throughout the compliance period. For WSD to perform compliance assessments, the utilities must provide completed work and locations to WSD inspectors. SDG&E proposes that the WSD align the compliance period with the definition of the WSD quarterly report submittals, and utilize the completed work submittals required by the GIS taxonomy document as the quarterly completed work submittals to perform the audits. If these submittals could be aligned, this would streamline the required information necessary to perform the audits, and remove duplicative work required by utilities to submit the same information (*e.g.*, completed

¹ Wildfire Safety Division email, "Wildfire Safety Division Compliance Workshop – September 29, 2020 – Update" (September 18, 2020).

² Staff Proposal at p. 4.

work) in different formats. If inspectors need the data in a different format or need slightly different information, then WSD could revise the GIS taxonomy document to include these needs. SDG&E believes it would benefit the WSD and utilities to align quarterly report submittals and compliance timeframes and streamline the process by having WSD compliance inspectors utilize existing data submittals to perform their audits.

The WSD describes compliance findings as severe, moderate, and minor.³ While SDG&E does not take issue with the prioritization criteria or repair time frames (as this is very close to how SDG&E currently performs its maintenance inspections and repairs), SDG&E recommends that the WSD provide additional definitions, as well as example photos in order to train WSD inspectors on what constitutes a severe, moderate, or minor designation. While SDG&E has significant amounts of training in an effort to ensure consistency in evaluation of structures among its own inspectors, assessments by nature are somewhat subjective to the experience of the individual inspector. SDG&E would, to the extent possible, like to build alignment with the WSD on what merits these severity levels, so that SDG&E can align its inspection workforce with these expectations.

SDG&E appreciates the opportunity to provide these comments and looks forward to working with the WSD and stakeholders on these issues.

Respectfully submitted,

/s/ Laura M. Fulton

Laura M. Fulton

Attorney for

San Diego Gas & Electric Company

³ Staff Proposal at p. 5.