



**Christopher M. Lyons**  
Senior Counsel  
San Diego Gas & Electric Company  
8330 Century Park Court, CP32D  
San Diego, CA 92123  
Tel: 858-654-1559  
Fax: 619-699-5027  
clyons@sdge.com

July 13, 2020

**VIA EMAIL**

Caroline Thomas Jacobs  
Director  
Wildfire Safety Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: San Diego Gas & Electric Company's List of Aggregated Wildfire Mitigation Measures

Dear Ms. Jacobs:

Pursuant to Ordering Paragraph 11 of Resolution WSD-002 (Guidance Resolution), San Diego Gas & Electric Company (SDG&E) submits the attached list of wildfire mitigation measures included in its 2020 Wildfire Mitigation Plan (WMP), identifying which initiatives are part of a combined program that cannot be disaggregated.

On December 16, 2019, the Wildfire Safety Division (WSD) issued its guidelines and templates for the 2020 WMPs. The utilities were required to organize their wildfire mitigation programs and activities into 10 categories and 86 prescriptive initiatives. SDG&E strived to organize its WMP within the categories and initiatives set forth by WSD, but as SDG&E explained to WSD during various meetings, and in its recent comments on the WMP draft resolutions, certain programs do not perfectly align with WSD's requested format.

SDG&E submitted its WMP activities in a consistent manner with how SDG&E submitted its wildfire mitigation activities in its 2019 Risk Assessment Mitigation Phase (RAMP) submittal from activity, cost, and risk spend efficiency (RSE) perspectives. SDG&E fit the wildfire mitigation RAMP activities into the WSD required categories to the extent possible. While some fit very well, others combined activities or others disaggregated even further than requested by WSD.

SDG&E looks forward to a collaborating with WSD on an approach to define the WMP categories and initiatives that would align with the requirements of all filings

including the WMP, RAMP, and general rate case (GRC). It is important to align these proceedings because they are intertwined: RAMP includes a wildfire risk chapter; RAMP precedes and ties directly to the GRC; and cost recovery for WMPs are to occur in the GRC. SDG&E thus requests that WSD consider the following.

For capital programs, given their finite nature, specific budget codes or charge numbers are developed for each program or activity, making it simple to forecast and track those costs. Programs like overhead hardening, covered conductor, undergrounding, and capital equipment replacement programs can easily fit into the required categories; costs can be tracked separately; and RSEs may be calculated. SDG&E has already provided and will continue to provide the required level of detail when it comes to its capital programs.

Operations and maintenance (O&M) programs are more difficult to disaggregate because rates have historically been authorized at a work group or cost center level, and not at an individual activity level. For example, the Electrical Regional Operations department that contains all SDG&E's distribution line crews reports its O&M costs as a total for all activities they perform, which includes both wildfire mitigation activities (*e.g.*, patrolling during Public Safety Power Shutoff (PSPS) events and performing inspections within the high fire threat district (HFTD)) and non-wildfire mitigation activities (*e.g.*, responding to day-to-day outages and performing inspection and maintenance along the coast).

SDG&E does not have the level of granularity requested for O&M activities today, and developing that capability would require additional investments in technology tools, processes and training. With collaboration, the Commission, WSD, and utilities can find agreement on the right level of detail to minimize the level of new investments and work required, while still providing sufficient detail on wildfire mitigation operations and maintenance activities.

SDG&E appreciates the opportunity to further explain why certain wildfire mitigation programs cannot be disaggregated. SDG&E welcomes the opportunity to continuing working with the WSD and stakeholders on this issue.

Respectfully submitted,

/s/ Christopher M. Lyons

Attorney for  
San Diego Gas & Electric Company

cc: Service List for R.18-10-007  
CAL FIRE