

PUBLIC UTILITIES COMMISSION

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CPUC-WSD ID: 2020-QR_SDGE-01

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Regulatory Affairs
San Diego Gas & Electric (SDG&E)
8330 Century Park Court
San Diego, CA 92123

SUBJECT: Notice of Non-Compliance (NONC) Identified During 2020 Wildfire Mitigation Plan (WMP) Quarterly Report (QR) Review

Dear Ms. Raagas:

On behalf of the California Public Utilities Commission (CPUC or Commission), Wildfire Safety Division (WSD) staff reviewed SDG&E's QR submitted on September 9, 2020. The QR filing is a requirement of SDG&E's conditionally approved 2020 WMP, pursuant to Ordering Paragraph (OP) 7 of Resolution WSD-002. SDG&E's QR filing must address the Class B Deficiencies identified in Resolutions WSD-002 and WSD-005. Class B Deficiencies are defined as aspects of the WMP that are insufficient in detail or justification.¹

Resolution WSD-002, Section 5.3.2 at p.18 states:

“Class B deficiencies are of moderate concern and require reporting on a quarterly basis by the electrical corporation to provide missing data or update its progress in a quarterly report. Such information shall be submitted either one time in the first quarterly report or on an ongoing basis as specified by each condition. The quarterly reports shall be named “[Name]’s Quarterly Report on 2020 Wildfire Mitigation Plan for [period covered].” Each electrical corporation shall submit its initial quarterly report 90 days after the Commission ratifies the WSD Resolutions, and every three months thereafter. In some cases, individual Resolutions impose other additional reporting requirements, and the Resolutions contain relevant detail for those reports.”

All Class B Deficiencies identified in WSD-002 and WSD-005 are accompanied by corresponding Conditions intended to resolve the deficiencies. On July 17, 2020, the WSD

¹ Resolution WSD-002 at p.17.

issued a letter titled, “Guidance on the Remedial Compliance Plan & Quarterly Report Process Set Forth in Resolution WSD-002” (RCP & QR Guidance Letter).² The RCP & QR Guidance Letter details the WSD’s approach to assessing QRs, and outlines a set of criteria used to evaluate the sufficiency of SDG&E’s QR.

RCP & QR Guidance Letter at p. 5 and 6 states:

“Upon review of an electrical corporation’s QR, the WSD will issue one of the following determinations:

- *Sufficient – The QR is sufficient and no additional action is required;*
- *Insufficient – The QR is insufficient. The WSD may issue further guidance concurrent with a finding of insufficiency.”*

“If a QR is determined to be ‘Insufficient,’ the electrical corporation will be required to include supplementary documentation and clarifications, as provided by WSD guidance, in its subsequent QR. Repeated determinations of insufficiency will require the electrical corporation to remedy the issue in the 2021 WMP Update, and the WSD may recommend that the Commission take further action”

In accordance with WSD-002 OP 6, SDG&E must comply with Class B Conditions for its WMP to be deemed in compliance with Public Utilities Code Section (§) 8386 and the WSD’s WMP Guidelines. In order to remedy any of the insufficiencies identified, SDG&E must supply additional information as part of its 2021 WMP Update or, if not possible to meet this deadline, in a supplemental filing to its 2021 WMP Update submitted no later than February 26, 2021.

California Code, Public Utilities Code - PUC § 8386(c)(22) states that the wildfire mitigation plan shall include:

“Any other information the Wildfire Safety Division may require.”

As detailed in Table 1 below and outlined in WSD-002 and WSD-005, SDG&E is required to resolve the following Class B Deficiencies.

²https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organization/Divisions/WSD/WSD%20Guidance%20Statement%20on%20RCP%20QP%2020200717.pdf

Table 1: Class B Deficiencies from SDG&E's 2020 WMP

#	Deficiency/Condition No.	Deficiency Title	Sufficiency Finding
1	Guidance-1	Lack of risk spend efficiency (RSE) information	Insufficient
2	Guidance-2	Lack of alternatives analysis for chosen initiatives	Insufficient
3	Guidance-4	Lack of discussion on PSPS impacts	Insufficient
4	Guidance-5	Aggregation of initiatives into programs	Insufficient
5	Guidance-6	Failure to disaggregate WMP initiatives from standard operations	Sufficient
6	Guidance-7	Lack of detail on effectiveness of “enhanced” inspection programs	Insufficient
7	Guidance-9	Insufficient discussion of pilot programs	Insufficient
8	Guidance-10	Data issues - general	Deferred ³
9	Guidance-11	Lack of detail on plans to address personnel shortages	Sufficient
10	Guidance-12	Lack of detail on long-term planning	Sufficient
11	SDGE-1	SDG&E reports a high number of ignitions related to balloon contact.	Sufficient
12	SDGE-2	SDG&E reports a high number of ignitions related to vehicle contact.	Sufficient
13	SDGE-3	SDG&E fails to explain how it plans to incorporate lessons learned into updates of its risk models.	Insufficient
14	SDGE-4	SDG&E does not provide sufficient detail on strategic undergrounding pilots.	Insufficient
15	SDGE-5	SDG&E does not provide sufficient detail on need for regulatory assistance.	Sufficient
16	SDGE-6	SDG&E does not provide sufficient detail on plans for reinforcing transmission lines.	Insufficient
17	SDGE-7	Potential redundancies in vegetation management activities.	Insufficient
18	SDGE-8	Consideration of environmental impacts, local community input.	Insufficient

³The WSD is separately assessing the quality of geographic spatial information (GIS) data submissions required by Guidance-10, which will be addressed in GIS data quality control (QC) reports for each respondent electrical corporation.

#	Deficiency/Condition No.	Deficiency Title	Sufficiency Finding
19	SDGE-9	SDG&E does not explain how investments in undergrounding reduce planned vegetation management spend.	Insufficient
20	SDGE-11	Lack of detail on vegetation management around substations.	Sufficient
21	SDGE-12	Details of quality assurance, quality control.	Insufficient
22	SDGE-14	Granularity of “at-risk species.”	Insufficient
23	SDGE-15	Details of centralized data repository.	Insufficient
24	SDGE-16	Details of cooperative fuel reduction work.	Sufficient

While SDG&E timely filed a QR, upon review by the WSD, 15 of its 24 responses to Class B Deficiencies were found to be insufficient, with an additional finding (for Guidance-10) deferred to a separate WSD report, as previously noted. The WSD determined that SDG&E failed to adequately provide the required information needed to properly inform and sufficiently address its Class B Deficiencies. Accordingly, the WSD has determined that SDG&E is out of compliance with California Public Utilities Code PUC § 8386, Resolution WSD-002, and Resolution WSD-005 for failure to adequately meet all of the requirements to address its Class B Deficiencies. The WSD may use this NONC or future such notices to support recommendations of enforcement action to the Commission.

Please refer to the QR Action Statement for more details on the insufficiencies for each individual Class B Condition, as well as guidance on how to respond to the NONC, including Action Items required to meet compliance. If you have any questions concerning this NONC, please contact Sara Moore at (916) 215-6295 or sara.moore@cpuc.ca.gov.

Sincerely,



Koko Tomassian
 Program and Project Supervisor
 Mitigation Branch
 Wildfire Safety Division
 California Public Utilities Commission

Cc: Caroline Thomas Jacobs, Director, Wildfire Safety Division, CPUC
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