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VIA EMAIL

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

Re: San Diego Gas & Electric Company's Comments on Draft Resolution WSD-011 Regarding the 2021 Wildfire Mitigation Plans and Safety Culture Assessments

Dear Wildfire Safety Division:

Pursuant to the instructions provided by the Wildfire Safety Division (WSD) in Draft Resolution WSD-011 (Draft Resolution), San Diego Gas & Electric Company (SDG&E) submits these comments on the WSD's guidance on the 2021 Wildfire Mitigation Plan (WMP or Plan) Update and its proposed process for conducting annual safety culture assessments. SDG&E generally supports the Draft Resolution. In these comments, SDG&E offers clarifications and suggested modifications to certain requirements in the attachments to the Draft Resolution for the WSD's consideration.

I. Incorporation of Wildfire Safety Advisory Board Recommendations

SDG&E appreciates the WSD's prioritization of the Wildfire Safety Advisory Board (WSAB) recommendations based on value and feasibility. Of note, SDG&E agrees that the development of new models or metrics, which tie risk to cost, is more appropriately addressed in the Commission's Safety Model Assessment Proceeding (S-MAP) as the implications of such models or metrics go beyond the WMPs. SDG&E is developing its Wildfire Next Generation System (WiNGS) model and is presenting it in the S-MAP proceeding.

II. 2021 Wildfire Mitigation Plan Update Requirements

A. Changes to WMP Guidelines

SDG&E generally supports the changes to the WMP guidelines and appreciates the WSD's incorporation stakeholder comments. In Section II.B below, SDG&E outlines specific comments to clarify or refine certain guidelines.

B. 2021 WMP Guidelines Template

1. Section 4: Lessons Learned and Risk Trends

WMP Section 4.5.2.5 Urban, rural, and highly rural

As stated in its 2020 WMP, SDG&E does not currently separate its service territory or geospatially layer its service territory into urban, rural, and highly rural areas. While the WSD has clearly outlined in the WMP templates how this information should be presented and how to calculate these areas, it is not something SDG&E currently has or does. To create these layers, and the associated summary level reporting, would take yet another significant manual effort. SDG&E submits that there is little value in reporting the information in this format, and urges the WSD to allow the utilities to continue to report and provide summary level data in terms of the high fire threat district (HFTD) tiers (Tier 3 and Tier 2), the Wildland Urban Interface (WUI), and Non-HFTD, which are the geospatial layers most relevant to wildfire risk. Further, this is the terminology and format used by the majority of the utilities, as well as the state.

C. 2021 Performance Metrics Data Template (Non-Spatial Data)

SDG&E appreciates the WSD's efforts in reviewing and streamlining the 2021 performance metrics data templates. Upon its initial review, SDG&E provides the following comments:

In general, SDG&E believes the requirements around reporting all wildfire mitigation tables on a quarterly basis – in addition to the geospatial quarterly requirements – are overly burdensome, exceed what is necessary for appropriate review, and will be difficult to execute in a meaningful way. To be able to execute these requirements in the required level of detail and frequency, SDG&E will need to grow both in the business units that are responsible for executing the work, and in the centralized groups tasked with working across the organization to create the wildfire mitigation plans, tables, and updates. SDG&E will also need to continue to invest in information technology (IT) products to begin to automate and streamline the creation of these tables and quarterly submittals, which are currently all manual.

SDG&E understands the desire to have all this summary information on a more frequent basis but believes that needs to be balanced against the level of effort of all

parties required to create, review, and comment in these condensed intervals. As a compromise solution, SDG&E recommends that utilities report quarterly on all tables, rows, and columns related to historical data or reported actuals, and provide updates on the forecasted values once a year correlating with the February submittals of the WMP updates. This specifically includes WMP Tables 7.1, 7.2, 8, 10, 11, and 12.

WMP Table 7.1 and Table 7.2

In general, SDG&E sees the transition from the previous WMP Table 11 to Tables 7.1 and 7.2 as beneficial. The updated tables provide a more appropriate level of equipment failure categories to utilize and wire downs and fuse operations have been removed from outage types (as they are more results than causes), which led to the double counting of risk events in the prior WMP submittal. SDG&E believes that elements like wire down and fuse operations are still important and relevant as far as measuring the effectiveness of wildfire mitigations targeting those issues. SDG&E also proposes some summary level views of risk events, to see probability of ignition numbers as a whole. SDG&E recommends a distribution section like the following, with changes highlighted in yellow.

Outage - Distribution	Summary Total	Total Risk Events (Equal to table 2 1a) and = 17f +18p + 19a + 20a + 21a + 22a + 23a + 24a
	17. Contact from object - Distribution	17.a. Veg. contact- Distribution
		17.b. Animal contact- Distribution
		17.c. Balloon contact- Distribution
		17.d. Vehicle contact- Distribution
		17.e. Other contact from object - Distribution
	Summary Total	17.f. Total contact from object
	18. Equipment / facility failure - Distribution	18.a. Capacitor bank damage or failure- Distribution
		18.b. Conductor damage or failure — Distribution
		18.c. Fuse damage or failure - Distribution
		18.d. Lightning arrestor damage or failure- Distribution
		18.e. Switch damage or failure- Distribution
		18.f. Pole damage or failure - Distribution
		18.g. Insulator and brushing damage or failure - Distribution
		18.h. Crossarm damage or failure - Distribution
		18.i. Voltage regulator / booster damage or failure - Distribution
		18.j. Recloser damage or failure - Distribution
		18.k. Anchor / guy damage or failure - Distribution
		18.l. Sectionalizer damage or failure - Distribution
		18.m. Connection device damage or failure - Distribution
		18.n. Transformer damage or failure - Distribution
		18.o. Other - Distribution
	Summary Total	18.p. Total Equipment Failure
	19. Wire-to-wire contact - Distribution	19.a. Wire-to-wire contact / contamination- Distribution
	20. Contamination - Distribution	20.a. Contamination - Distribution
	21. Utility work / Operation	21.a. Utility work / Operation
	22. Vandalism / Theft - Distribution	22.a. Vandalism / Theft - Distribution
	23. Other- Distribution	23.a. All Other- Distribution
	24. Unknown- Distribution	24.a. Unknown - Distribution
	Fuse Operations	Total Fuse Operations (of risk events above, how many were isolated by fuses)
	Wire Downs	Total Wire Downs (of risk events above, how many resulted in wire downs)

While the rows have been improved, SDG&E thinks that the original WMP Table 11 columns that looked at risk events, ignitions, and ignition percentages is the appropriate way to continue to view these tables. SDG&E also agrees with the addition of HFTD in WMP Table 7.2, but believes it also needs to exist in WMP Table 7.1 as well. Outages and ignitions are related and setting up the table in that way can lead to some interesting insights. For example, it can provide the overall ignition percentages in

the HFTD Tier 3 versus Tier 2 versus outside the HFTD. Certainty consequences are higher in the HFTD should an ignition occur, but the environmental conditions play a role in ignition probability as well. To capture ignition percentage, both the risk event and the ignition event, broken out by HFTD are needed. SDG&E also believes it would be interesting to look at fuse operations and wire downs in this way. Based on experience, SDG&E believes wire downs would have a higher ignition percentage than other types of failures due to the arc flash happening near the fuel source. Presenting the data in this way would provide insight into the validity of that assumption. For the fuses, as SDG&E executes its expulsion fuse replacement program, SDG&E expects to see ignition percentage of fuse operations (not necessarily fuse operations) decrease as part of this mitigation.

WMP Tables 8 and 9

SDG&E seeks clarification on the difference between WMP Tables 8 and 9. SDG&E assumes that Table 8 is additions and removals, which would essentially only pertain to undergrounding projects, whereas Table 9 contains upgrades, including all overhead hardening programs. SDG&E also recommends the WUI should be moved from rows to columns as it is another geospatial layer, just like HFTD Tiers or Non-HFTD.

WMP Table 12

SDG&E recommends the addition of a free hand units column, like column AB of WMP Table 7.1 so that per unit targets, actuals, and costs can actually be reported. For example, SDG&E would prefer to say it replaced 3,000 fuses vs. N/A line miles.

D. Changes to WMP Process

In Draft Resolution WSD-011, Attachment 3 (at page 4, Section A), the WSD asserts continued approval of the WMPs will be contingent upon complete and adequate filings along with data from Quarterly Reports and other relevant filings. SDG&E contends that approval of the WMPs should continue to occur on an annual basis and approval should last at least until the following year with the WMP update submittals. If WMP approval could be revoked on a quarterly evaluation, it would make it difficult for utilities to execute the work associated with the annual plans with confidence, and it could also create uncertainties with respect to the annual Safety Certification Process, which is a key statutory element of Assembly Bill 1054 (2019). Much of the hardening work discussed in the WMPs requires long term planning, engineering, and design and are more aligned with annual versus quarterly approvals. SDG&E intends to comply with all reporting requirements, quarterly or otherwise, with the best data and information available to SDG&E at the time of submittal, but the approvals should remain at least on an annual frequency.

E. 2021 Maturity Model

SDG&E generally supports the WSD's guiding vision provided in the Utility Wildfire Mitigation Maturity Model (Maturity Model). SDG&E appreciates the WSD's decision to refrain from making any foundational changes to the Maturity Model and related utility survey for the 2021 WMP update in order to maintain consistency over the current three-year WMP cycle. This will ensure the utilities track their wildfire mitigation progress against the 2020 baseline. However, when foundational changes are considered for the next WMP cycle for 2023-2025, SDG&E urges the WSD to collaborate with the utilities and stakeholders through a series of workshops to refine and provide input for the Maturity Model.

SDG&E understands the intent of the Maturity Model and utility survey is to assess utility capabilities in reducing wildfire risk and track improvements and progress in a three-year cycle. While a significant amount of work and effort is underway across all the Maturity Model categories, more time is needed in certain areas to move the needle.

III. Annual Safety Culture Assessment Process

SDG&E supports the WSD's proposal for an annual Safety Culture Assessment pursuant to Cal. Pub. Util. Code §8389. As stated in its comments on the Staff Proposals, SDG&E is currently developing and implementing an enterprise-wide Safety Management System (SMS) that would encompass its electric operations and wildfire mitigation activities. The SMS is a continuous improvement framework designed to continually enhance SDG&E's safety culture.

SDG&E shares the WSD's aspirations to "ground its safety culture assessment in data-driven insight, and connect the results to known outcome metrics," "ground its assessment in cultural drivers of wildfire risk," and "foster continuous and collaborative improvement," as outlined in Attachment 4 (p. 3).

Attachment 4 further states that "[e]ach electrical corporation may conduct its own internal safety culture assessment in addition to the WSD's assessment." SDG&E issues a safety culture barometer survey every two years which is administered by a third party, the National Safety Council. Based on initial input from the WSD, SDG&E included additional questions in this year's 2020 safety culture barometer survey.

IV. CONCLUSION

SDG&E appreciates the opportunity to provide these comments on the draft resolutions and requests that the WSD resolve the errors identified herein.

Respectfully submitted,

/s/ Christopher M. Lyons

Attorney for
San Diego Gas & Electric Company

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