

Company: San Diego Gas & Electric Company (U 902 M)
Proceeding: 2024 General Rate Case – Track 3
Application: A.22-05-016
Exhibit: SDG&E-T3-WPMA-04.1-R

**REVISED APPENDICIES TO THE PREPARED REBUTTAL
TESTIMONY OF JONATHAN WOLDEMARIAM
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY
(TRACK 3 – WILDFIRE)**

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



September 2025

Appendix 1

Rebuttal Testimony of Jonathan Woldemariam
SDG&E-T3-WMPMA-04
Appendix 1

Job Title	In Office Days	Dept	Division	Building	CP3 Floor/Space	Notes/Check-In
Proj Mgr - Wildfire Mit Prgm	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01015	Only Wed=cube
Sr Pub Affrs Mgr		Regional Public Affairs	External & Ops Support		01015	
Sr Pub Affrs Mgr	Tue/Thu	Regional Public Affairs	External & Ops Support	Century Park Bldg 03	01020	
Prin Wildfire Mit Data Analyst	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01020	Only Wed=cube
Regnl Pub Affrs Mgr	Tue/Thu	Regional Public Affairs	External & Ops Support	Century Park Bldg 03	01025	
Wildfire Mit Prgm Compl Tm Ld	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01025	Only Wed=cube
Data Scientist - IT	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01035	Only Wed=cube
Proj Mgr - Wildfire Mit PSPS	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01040	Only Wed=cube
Proj Affrs Advr	Tue/Thu	Regional Public Affairs	External & Ops Support	Century Park Bldg 03	01050	
IT Assoc-R					01050	
Municipal Infra Advr	Tue/Thu	Regional Public Affairs	External & Ops Support	Century Park Bldg 03	01055	
Data Scientist - IT	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01055	Only Wed=cube
Proj Mgr - Wildfire Mit Prgm	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01060	Only Wed=cube
Municipal Infra Advr	Tue/Thu	Regional Public Affairs	External & Ops Support	Century Park Bldg 03	01060	
Municipal Infra Advr	Tue/Thu	Regional Public Affairs	External & Ops Support	Century Park Bldg 03	01065	
Proj Mgr - Wildfire Mit Prgm	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01065	Only Wed=cube
Pub Affrs Mgr	Tue/Thu	Regional Public Affairs	External & Ops Support	Century Park Bldg 03	01070	
Proj Mgr - III	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01070	Only Wed=cube
Administrative Assistant (NSA)	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01075	Only Wed=cube
Pub Affrs Spec	Tue/Thu	Regional Public Affairs	External & Ops Support	Century Park Bldg 03	01075	
Pub Affrs Mgr	Tue/Thu	Regional Public Affairs	External & Ops Support	Century Park Bldg 03	01080	
Prin Wildfire Mit Data Analyst	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01080	Only Wed=cube
Wildfire Reg Anlytcs Tm Ld	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01085	Only Wed=cube
Pub Affrs Mgr	Tue/Thu	Regional Public Affairs	External & Ops Support	Century Park Bldg 03	01085	
Dir - Wildfire Mit & Veg Mgmt	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01105	Only Wed=cube
Wildfire Mit Prgm Mgr	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01110	Only Wed=cube
Regnl Proj Affrs Mgr	Tue/Thu	Regional Public Affairs	External & Ops Support	Century Park Bldg 03	01110	
Regnl Pub Affrs Mgr	Tue/Thu	Regional Public Affairs	External & Ops Support	Century Park Bldg 03	01115	
Wildfire Mit Prgm Strategy Mgr	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01115	Only Wed=cube
Dir - Regional Public Affairs	Tue/Thu	Regional Public Affairs	External & Ops Support	Century Park Bldg 03	01120	
Proj Mgr - II	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01135	
Reg Case Mgr - III	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01140	
Sr Accountant - II	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01145	
Reg Case Mgr - III	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01150	
GRC Prgm Mgr	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01170	
Reg Case Mgr - II	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01175	
Busn Plng & Data Mgr	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01180	
Prin Busn Analyst	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01185	
Reg Case Mgr - III	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01190	
Prin Accountant	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01195	
GRC Prgm Mgr	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01205	
GRC Prgm Mgr	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01210	
Trans Revenue Mgr	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01215	
Dir - GRC & Revenue Reqmts	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01220	
Prin Busn Analyst	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01230	
Proj Mgr - Wildfire Mit Prgm	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01235	Only Wed=cube
Reg Case Analyst	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01270	
Project Manager	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01275	
Reg Case Admtr	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01280	
Wildfire Mit Meas & Metrcs Mgr	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01285	Only Wed=cube
Wildfire Rsk Dta Anlytcs Tm Ld	Tue/Wed	Wildfire Mitigation	Wildfire & Climate Science	Century Park Bldg 03	01290	Only Wed=cube
Reg Case Mgr - III	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01295	
Reg Case Mgr - III	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01300	
Reg Case Mgr - III	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01305	
Reg Case Mgr - II	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01310	
Reg Case Mgr - III	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01315	
Reg Case Mgr - III	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01320	
Regulatory Policy Mgr	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01325	
Reg Busn Mgr	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01330	
Sr Reg Pol Mgr	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01340	
Reg Busn Mgr	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01365	
Reg Busn Mgr	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01370	
Reg Busn Mgr		Policy & Proceedings	Regulatory Affairs SDG&E & SCG		01370	
Reg Tariff Mgr	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01375	
Reg Case Mgr - II	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01380	
Reg Case Mgr - II	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01385	
Reg Case Mgr - I	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01390	
Reg Case Admtr	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01395	
Reg Case Mgr - I	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01400	
Reg Case Mgr - I	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01405	
Proj Mgr		Policy & Proceedings	Regulatory Affairs SDG&E & SCG		01410	
Reg Case Analyst	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01415	
Reg Tariff Admtr	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01420	
Reg Tariff Admtr	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01430	

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SDG&E-T3-WMPMA-04
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Job Title	In Office Days	Dept	Division	Building	CP3 Floor/Space	Notes/Check-In
Reg Tariff Admtr	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01435	
Sr Reg Tariff Admin	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01440	
Sr Strgc Plng Advr	Wed/Thu	Strategic Planning	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01450	
Prin Stgc Plng Advr	Wed/Thu	Strategic Planning	Regulatory Affairs SDG&E & SCG		1455	
Busn Analyst - II	Wed/Thu	Strategic Planning	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01460	
Strgc Plng Advr	Wed/Thu	Strategic Planning	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01465	
Strgc Initiatives Mgr	Wed/Thu	Strategic Planning	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01470	
Dir - CA & Federal Regulatory	Wed/Thu	Policy & Proceedings	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01475	
Dir - Strgc Planning	Wed/Thu	Strategic Planning	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01480	
Strgc Plng & Pol Mgr	Wed/Thu	Strategic Planning	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01485	
Reg Case Analyst	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01200A	
Reg Case Analyst	Wed/Thu	GRC & Revenue Reqmts	Regulatory Affairs SDG&E & SCG	Century Park Bldg 03	01200B	
Reg Case Mrg - III		Policy & Proceedings	Regulatory Affairs SDGE & SCG			

Appendix 2

A.22-05-015 Track 3
SDG&E-T3-WMPMA-04
Appendix 2

WMP Capital Direct Costs and Units				Actual Capital Costs (\$ in 000s)				Actual Capital Units				Authorized Capital Costs (\$ in 000s)				
2023 WMP Category	Initiative	Unit Type	WMP Tracking ID	Non-HFTD	WUJ (Outside HFTD)	HFTD	Total	Non-HFTD	WUJ (Outside HFTD)	HFTD	Total	Non-HFTD	WUJ (Outside HFTD)	HFTD	Total	Non-HFTD
Situational Awareness and Forecasting	Weather Stations and NDVI Cameras	NA	WMP.447	NA	NA	NA	\$ 292.83	NA	NA	NA	NA	NA	NA	NA	\$ 883.45	NA
Situational Awareness and Forecasting	Air Quality Index	Sensors	WMP.970	\$ 13.67	\$ 13.67	\$ 14.67	\$ 82.01	1.00	1.00	4.00	6.00	\$ -	\$ -	\$ -	\$ -	-
Grid Design, Operations, and Maintenance	Wireless Fault Indicators	Wireless fault indicators	WMP.449	NA	NA	NA	\$ 10.67	-	-	0.00	0.00	\$ -	\$ -	\$ 1,876.99	\$ 1,876.99	-
Situational Awareness and Forecasting	Fire Potential Index	NA	WMP.450	NA	NA	NA	\$ 1,330.30	NA	NA	NA	NA	\$ -	\$ -	\$ -	\$ -	NA
Situational Awareness and Forecasting	High Performance Computing Infrastructure	NA	WMP.541	NA	NA	NA	\$ 10.13	NA	NA	NA	NA	\$ -	\$ -	\$ -	\$ -	NA
Grid Design, Operations, and Maintenance	SCADA Capacitors	capacitors	WMP.453	\$ -	\$ 906.00	\$ 388.67	\$ 1,295.67	-	14.00	6.00	20.00	\$ -	\$ -	\$ 1,879.84	\$ 1,879.84	-
Grid Design, Operations, and Maintenance	Covered Conductor	miles	WMP.455	\$ -	\$ -	\$ 39,408.74	\$ 39,408.74	-	-	60.00	60.00	\$ -	\$ -	\$ -	\$ -	-
Grid Design, Operations, and Maintenance	Expulsion Fuse Replacement	fuses	WMP.459	\$ -	\$ -	\$ 42.13	\$ 42.13	-	-	36.00	36.00	\$ -	\$ -	\$ -	\$ -	-
Grid Design, Operations, and Maintenance	PSPS Sectionalizing Enhancements	switches	WMP.461	\$ 206.47	\$ -	\$ 2,477.59	\$ 2,684.05	1.00	-	12.00	13.00	\$ -	\$ -	\$ -	\$ -	-
Grid Design, Operations, and Maintenance	Microgrids	microgrids	WMP.462	\$ -	\$ -	\$ 6,856.74	\$ 6,856.74	NA	NA	NA	NA	\$ -	\$ -	\$ -	\$ -	-
Grid Design, Operations, and Maintenance	Advanced Protection	circuits	WMP.463	\$ -	\$ -	\$ 7,488.39	\$ 7,488.39	-	-	4.00	4.00	\$ -	\$ -	\$ 11,494.28	\$ 11,494.28	-
Grid Design, Operations, and Maintenance	Hotline Clamps	clamps	WMP.464	\$ -	\$ 0.03	\$ 0.03	\$ 0.04	-	229.00	738.00	967.00	\$ -	\$ -	\$ -	\$ -	-
Grid Design, Operations, and Maintenance	Strategic Undergrounding	miles	WMP.473	\$ -	\$ -	\$ 98,300.69	\$ 98,300.69	-	-	72.00	72.00	\$ -	\$ -	\$ -	\$ -	-
Grid Design, Operations, and Maintenance	DIST OH Hardening - Traditional Hardening	miles	WMP.475	\$ -	\$ -	\$ 4,121.82	\$ 4,121.82	-	-	2.33	2.33	\$ -	\$ -	\$ 59,561.41	\$ 59,561.41	-
Grid Design, Operations, and Maintenance	Transmission OH Hardening - DUB	miles	WMP.545	\$ -	\$ -	\$ 16,537.06	\$ 16,537.06	-	-	21.00	21.00	\$ -	\$ -	\$ 537.35	\$ 537.35	-
Grid Design, Operations, and Maintenance	Cleveland National Forest Fire Hardening	miles	WMP.1017	\$ -	\$ -	\$ 1,383.78	\$ 1,383.78	NA	NA	NA	NA	\$ -	\$ -	\$ 13,469.62	\$ 13,469.62	-
Grid Design, Operations, and Maintenance	LTE Communication Network (DCR)	stations	WMP.549	\$ 5,729.08	\$ 2,864.50	\$ 5,729.08	\$ 45,512.27	4.00	2.00	4.00	10.00	\$ -	\$ -	\$ 14,349.44	\$ 14,349.44	-
Grid Design, Operations, and Maintenance	Lightning Arrestor Replacement	arrestors	WMP.550	\$ -	\$ 17.77	\$ 2,155.55	\$ 2,173.32	-	18.00	2,184.00	2,202.00	\$ -	\$ -	\$ -	\$ -	-
Grid Design, Operations, and Maintenance	AJAX Protection	poles	WMP.972	\$ -	\$ 120.21	\$ 1,398.57	\$ 1,518.78	-	52.00	605.00	657.00	\$ -	\$ -	\$ 1,033.84	\$ 1,033.84	-
Grid Design, Operations, and Maintenance	Distribution OH Detailed	inspections	WMP.478	\$ -	\$ -	\$ 1,450.52	\$ 1,450.52	-	-	11,755.00	11,755.00	\$ -	\$ -	\$ 1,397.60	\$ 1,397.60	-
Grid Design, Operations, and Maintenance	Transmission OH Detailed Inspections	inspections	WMP.479	\$ -	\$ -	\$ 1,314.36	\$ 1,314.36	-	-	1,928.00	1,928.00	\$ -	\$ -	\$ 596.43	\$ 596.43	-
Grid Design, Operations, and Maintenance	Distribution Woodpole Intrusive	inspections	WMP.483	\$ -	\$ -	\$ 110.77	\$ 110.77	-	-	1,038.00	1,038.00	\$ -	\$ -	\$ 123.41	\$ 123.41	-
Grid Design, Operations, and Maintenance	Drone Assessments of Distribution Infrastructure	inspections	WMP.552	\$ 219.81	\$ 4,096.46	\$ 39,391.64	\$ 43,707.91	77.00	1,435.00	13,799.00	15,311.00	\$ -	\$ -	\$ -	\$ -	-
Grid Design, Operations, and Maintenance	Distribution OH Patrols	inspections	WMP.488	\$ -	\$ -	\$ 9,162.51	\$ 9,162.51	-	-	85,847.00	85,847.00	\$ -	\$ -	\$ 10,207.91	\$ 10,207.91	-
Emergency Preparedness	Aviation Firefighting Program	NA	WMP.557	NA	NA	NA	\$ 5,056.95	NA	NA	NA	NA	\$ -	\$ -	\$ -	\$ -	NA
Grid Design, Operations, and Maintenance	Centralized Repository for Data	NA	WMP.519	NA	NA	NA	\$ 6,905.32	NA	NA	NA	NA	\$ -	\$ -	\$ -	\$ -	NA
Wildfire Mitigation Strategy Development	Allocation Methodology Development and Application	NA	WMP.523	NA	NA	NA	\$ 6,117.45	NA	NA	NA	NA	\$ -	\$ -	\$ -	\$ -	NA
Emergency Preparedness	Emergency preparedness plan	NA	WMP.1008	NA	NA	NA	\$ 15,686.49	NA	NA	NA	NA	NA	NA	NA	\$ 720.53	NA
Emergency Preparedness	Public emergency communication strategy	NA	WMP.563	NA	NA	NA	\$ 19,407.71	NA	NA	NA	NA	\$ -	\$ -	\$ -	\$ -	NA
Grid Design, Operations, and Maintenance	Strategic Pole Relacement	poles	WMP.1189	\$ -	\$ 59.23	\$ -	\$ 59.23	-	1.00	0.00	1.00	\$ -	\$ -	\$ -	\$ -	-
Grid Design, Operations, and Maintenance	Early fault detection	Nodes	WMP.1195	\$ 369.09	\$ -	\$ 1,559.95	\$ 1,919.94	6.00	-	26.00	32.00	\$ -	\$ -	\$ -	\$ -	-

A.22-05-015 Track 3
SDG&E-T3-WMPMA-04
Appendix 2

WMP Capital Direct Costs and Units				Authorized Capital Units			Variance Capital Costs (\$ in 000s)				Variance Capital Units				Status	Methodology /Assumptions	Notes	
2023 WMP Category	Initiative	Unit Type	WMP Tracking ID	WUI (Outside HFTD)	HFTD	Total	Non-HFTD	WUI (Outside HFTD)	HFTD	Total	Non-HFTD	WUI (Outside HFTD)	HFTD	Total				
Situational Awareness and Forecasting	Weather Stations and NDM Cameras	NA	WMP.447	NA	NA	NA		NA	NA	NA	\$ (290.62)	NA	NA	NA	NA	Proceeding as Planned	Authorized / Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific.
Situational Awareness and Forecasting	Air Quality Index	Sensors	WMP.970		-	-	\$ 13.67	\$ 13.67	\$ (54.67)	\$ 82.01	1.00	1.00	4.00	6.00	Emergent	HFTD based on actual units and applied to actual costs.		
Grid Design, Operations, and Maintenance	Wireless Fault Indicators	Wireless fault indicators	WMP.449		-	\$16.00		NA	NA	NA	\$ (1,866.32)	-	-	(\$16.00)	(\$16.00)	Deferred	Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.	
Situational Awareness and Forecasting	Fire Potential Index	NA	WMP.450	NA	NA	NA		NA	NA	NA	\$ 1,330.30	NA	NA	NA	NA	Emergent	Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific; nor does it have units of work.
Situational Awareness and Forecasting	High Performance Computing Infrastructure	NA	WMP.541	NA	NA	NA		NA	NA	NA	\$ 10.13	NA	NA	NA	NA	Emergent	Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific; nor does it have units of work.
Grid Design, Operations, and Maintenance	SCADA Capacitors	capacitors	WMP.453		-	\$3.00		\$ 906.90	\$ (1,491.27)	\$ (584.36)	-	-	14.00	(47.00)	(33.00)	Proceeding as Planned	Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.	
Grid Design, Operations, and Maintenance	Covered Conductor	miles	WMP.455		-	-	\$ -	\$ -	\$ 39,408.74	\$ 39,408.74	-	-	-	60.00	60.00	Emergent	Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.	
Grid Design, Operations, and Maintenance	Expulsion Fuse Replacement	fuses	WMP.459		-	-	\$ -	\$ -	\$ 42.13	\$ 42.13	-	-	-	36.00	36.00	Emergent	Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.	
Grid Design, Operations, and Maintenance	PSPS Sectionalizing Enhancements	switches	WMP.461		-	-	\$ 206.47	\$ -	\$ 2,477.59	\$ 2,684.05	1.00	-	12.00	13.00	Emergent	Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.		
Grid Design, Operations, and Maintenance	Microgrids	microgrids	WMP.462		-	-	\$ -	\$ -	\$ 6,856.74	\$ 6,856.74	NA	NA	NA	NA	NA	Emergent	Actual costs all shown in HFTD column.	
Grid Design, Operations, and Maintenance	Advanced Protection	circuits	WMP.463		-	\$4.00		\$ -	\$ -	\$ 14,005.88	\$ (14,005.88)	-	-	-	-	Proceeding as Planned	Authorized costs allocated 100% to HFTD. Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.	
Grid Design, Operations, and Maintenance	Hedline Clamps	clamps	WMP.464		-	-	\$ -	\$ 0.01	\$ 0.03	\$ 0.04	-	-	229.00	738.00	967.00	Emergent	Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.	
Grid Design, Operations, and Maintenance	Strategic Undergrounding	miles	WMP.473		-	-	\$ -	\$ -	\$ 98,300.69	\$ 98,300.69	-	-	-	72.00	72.00	Emergent	Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.	
Grid Design, Operations, and Maintenance	DIST OH Hardening - Traditional Hardening	miles	WMP.475		-	\$2.00		\$ -	\$ -	\$ (55,439.60)	\$ (55,439.60)	-	-	-	(49.67)	(49.67)	Proceeding as Planned	Authorized costs allocated 100% to HFTD. Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.
Grid Design, Operations, and Maintenance	Transmission OH Hardening - DUB	miles	WMP.545		-	\$0.70		\$ -	\$ -	\$ 15,999.71	\$ 15,999.71	-	-	-	20.80	20.80	Mix of projects proceeding as planned or completed, plus emergent projects not requested in the FY 2019 OMC.	Authorized costs allocated 100% to HFTD. Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.
Grid Design, Operations, and Maintenance	Cleveland National Forest Fire Hardening	miles	WMP.1017		-	\$3.00		\$ -	\$ -	\$ (12,085.84)	\$ (12,085.84)	NA	NA	NA	NA	Completed	Authorized / Actual costs all shown in HFTD column.	
Grid Design, Operations, and Maintenance	LTE Communication Network (DCRN)	stations	WMP.549		-	\$10.02		\$ 5,729.00	\$ 2,864.50	\$ (8,620.44)	\$ 32,162.83	4.00	2.00	(6.02)	(0.02)	Expanded	Authorized costs allocated 100% to HFTD. WMP unit type and actual unit cost applied to authorized dollars to derive authorized units.	Program supports Falling Conductor Protection, SCADA switches to support PSPS events and day-to-day operations, and Early Fault Detection (EFD) systems in the HFTD. Non-HFTD/WUI costs reflect isolated cost of building base stations outside the HFTD. Total project costs include one-time collective project costs for spectrum licensing and other IT costs.
Grid Design, Operations, and Maintenance	Lightning Arrestor Replacement	arrestors	WMP.550		-	-	\$ -	\$ 17.77	\$ 2,135.55	\$ 2,173.32	-	-	18.00	2,184.00	2,202.00	Emergent	Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.	
Grid Design, Operations, and Maintenance	Arjan Protection	poles	WMP.972		-	\$478.00		\$ 120.21	\$ 354.73	\$ 484.94	-	-	52.00	127.00	179.00	Proceeding as Planned	Authorized costs allocated 100% to HFTD. Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.	
Grid Design, Operations, and Maintenance	Distribution OH Detailed	inspections	WMP.478		-	\$11,326.13		\$ -	\$ -	\$ 52.92	\$ 52.92	-	-	428.87	428.87	Proceeding as Planned	Authorized costs allocated 100% to HFTD. Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.	
Grid Design, Operations, and Maintenance	Transmission OH Detailed Inspections	inspections	WMP.479		-	\$874.89		\$ -	\$ -	\$ 717.93	\$ 717.93	-	-	1,053.11	1,053.11	Proceeding as Planned	Authorized costs allocated 100% to HFTD. Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.	
Grid Design, Operations, and Maintenance	Distribution Woodpole Intrusive	inspections	WMP.483		-	\$1,156.43		\$ -	\$ -	\$ (12.64)	\$ (12.64)	-	-	(118.43)	(118.43)	Proceeding as Planned	Authorized costs allocated 100% to HFTD. Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.	
Grid Design, Operations, and Maintenance	Drone Assessments of Distribution Infrastructure	inspections	WMP.552		-	-	\$ 219.81	\$ 4,096.46	\$ 39,395.64	\$ 43,707.91	77.00	1,435.00	13,799.00	15,311.00	Emergent	Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.		
Grid Design, Operations, and Maintenance	Distribution OH Patrols	inspections	WMP.488		-	\$95,641.76		\$ -	\$ -	\$ (1,045.40)	\$ (1,045.40)	-	-	(9,794.76)	(9,794.76)	Proceeding as Planned	Authorized costs allocated 100% to HFTD. Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.	
Emergency Preparedness	Aviation Firefighting Program	NA	WMP.557	NA	NA	NA		NA	NA	NA	\$ 5,068.95	NA	NA	NA	NA	Emergent	Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific; nor does it have units of work.
Grid Design, Operations, and Maintenance	Centralized Repository for Data	NA	WMP.519	NA	NA	NA		NA	NA	NA	\$ 6,905.32	NA	NA	NA	NA	Emergent	Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific; nor does it have units of work.
Wildfire Mitigation Strategy Development	Allocation Methodology Development and Application	NA	WMP.523	NA	NA	NA		NA	NA	NA	\$ 6,117.40	NA	NA	NA	NA	Emergent	Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific; nor does it have units of work.
Emergency Preparedness	Emergency preparedness plan	NA	WMP.1008	NA	NA	NA		NA	NA	NA	\$ 15,965.95	NA	NA	NA	NA	Expanded	Authorized / Actual costs and units all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific; nor does it have units of work.
Emergency Preparedness	Public emergency communication strategy	NA	WMP.563	NA	NA	NA		NA	NA	NA	\$ 10,407.71	NA	NA	NA	NA	Emergent	Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific; nor does it have units of work.
Grid Design, Operations, and Maintenance	Strategic Pole Replacement	poles	WMP.1189		-	-	\$ -	\$ 59.23	\$ -	\$ 59.23	-	-	1.00	-	1.00	Emergent	Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.	
Grid Design, Operations, and Maintenance	Early fault detection	Nodes	WMP.1195		-	-	\$ 359.99	\$ -	\$ 1,559.95	\$ 1,519.94	6.00	-	26.00	32.00	Emergent	Actual units were based on GIS data; used unit splits for HFTD based on actual units and applied to actual costs.		

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WMP O&M Direct Costs and Units				Actual O&M Costs (\$)				Actual O&M Units				Authorized O&M				Authorized O&M			
2023 WMP Category	Initiative	Unit Type	WMP Tracking ID	Non-HTD	WUI (Outside HTD)	HTD	Total	Non-HTD	WUI (Outside HTD)	HTD	Total	Non-HTD	WUI (Outside HTD)	HTD	Total	Non-HTD	WUI (Outside HTD)	HTD	Total
Wildfire Mitigation Strategy Development	Summarized Risk Map	NA	WMP 442	NA	NA	NA	\$ 4,056.06	NA	NA	NA	NA	\$ -	\$ -	\$ -	\$ -	NA	NA	NA	NA
Situational Awareness and Forecasting	Air Quality Index	Sensors	WMP 970	\$ 10.95	\$ 10.95	\$ 43.81	\$ 65.71	1.00	1.00	4.00	6.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Situational Awareness and Forecasting	Weather Stations and NDVI Cameras	NA	WMP 447	NA	NA	NA	\$ 4,458.91	NA	NA	NA	NA	NA	NA	NA	\$ 2,395.00	NA	NA	NA	NA
Grid Design, Operations, and Maintenance	Covered Conductor	miles	WMP 455	\$ -	\$ -	\$ 3,372.46	\$ 3,372.46	-	-	60.00	60.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Microgrids	microgrids	WMP 462	\$ 402.06	NA	\$ 839.13	\$ 1,241.19	-	-	-	-	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Advanced Protection	circuits	WMP 463	\$ -	\$ -	\$ 232.35	\$ 232.35	-	-	4.00	4.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Hellfire Clamps	clamps	WMP 464	\$ -	\$ 393.61	\$ 1,268.49	\$ 1,662.10	-	229.00	738.00	967.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Generator Grant Programs	generators	WMP 466	\$ -	\$ 5,464.97	\$ 5,464.97	\$ 5,464.97	-	-	805.00	805.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Standby Power Programs	generators	WMP 468	\$ -	\$ -	\$ 12,711.75	\$ 12,711.75	-	-	362.00	362.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Generator Assistance Programs	generators	WMP 467	\$ -	\$ -	\$ 262.22	\$ 262.22	-	-	250.00	250.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Strategic Undergrounding	miles	WMP 473	\$ -	\$ -	\$ 429.17	\$ 429.17	-	-	72.00	72.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	O&T OH Hardening - Traditional Hardening	miles	WMP 475	\$ -	\$ -	\$ 1,093.74	\$ 1,093.74	-	2.33	2.33	\$ -	\$ -	\$ -	\$ 5,250.00	\$ 5,250.00	-	-	11.18	11.18
Grid Design, Operations, and Maintenance	Transmission OH Hardening - DIB	miles	WMP 545	\$ -	\$ -	\$ 0.41	\$ 0.41	-	-	21.50	21.50	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Cleveland National Forest Fire Hardening	miles	WMP 1017	NA	NA	\$ 657.58	\$ 657.58	-	-	-	-	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	LTE Communication Network (OCN)	stations	WMP 549	\$ 364.09	\$ 182.04	\$ 364.09	\$ 910.22	4.00	2.00	4.00	10.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Lightning Arrestor Replacement	arrestors	WMP 550	\$ -	\$ 0.76	\$ 64.93	\$ 65.69	-	18.00	2,184.00	2,202.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Avian Protection	poles	WMP 972	\$ -	\$ 0.81	\$ 9.42	\$ 10.23	-	52.00	605.00	657.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Distribution OH Detailed	inspections	WMP 478	\$ -	\$ -	\$ 792.22	\$ 792.22	-	-	11,755.00	11,755.00	\$ -	\$ -	\$ 13,379.00	\$ 13,379.00	-	-	198,517.98	198,517.98
Grid Design, Operations, and Maintenance	Transmission OH Detailed Inspections	inspections	WMP 479	\$ -	\$ -	\$ 35.56	\$ 35.56	-	-	1,928.00	1,928.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Enhanced Inspections of Distribution Infrastructure	inspections	WMP 481	\$ -	\$ -	\$ 329.68	\$ 329.68	-	-	11,900.00	11,900.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Distribution Woodpile Initiative	inspections	WMP 483	\$ -	\$ -	\$ 108.12	\$ 108.12	-	-	1,038.00	1,038.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	HTD Tier 3 Distribution Pole Inspections	inspections	WMP 551	NA	NA	NA	\$ -	-	-	-	-	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Drone Assessments of Distribution Infrastructure	inspections	WMP 552	\$ 268.06	\$ 4,995.58	\$ 48,037.58	\$ 53,301.22	77.00	1,435.00	13,799.00	15,311.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Distribution OH Patrols	inspections	WMP 488	\$ -	\$ -	\$ 330.61	\$ 330.61	-	-	85,847.00	85,847.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Vegetation Management and Inspections	Poles Management	poles cleared	WMP 497	\$ -	\$ -	\$ 4,071.34	\$ 4,071.34	-	-	514.00	514.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	LDAR Inspections of Vegetation around Distribution Infrastructure - Enhanced Inspections, Patrols and Trims	NA	WMP 484	NA	NA	NA	\$ 873.07	NA	NA	NA	NA	\$ -	\$ -	\$ -	\$ -	NA	NA	NA	NA
Vegetation Management and Inspections	Right Tree Right Place	NA	WMP 1325	NA	NA	NA	\$ 1,216.29	NA	NA	NA	NA	\$ -	\$ -	\$ -	\$ -	NA	NA	NA	NA
Vegetation Management and Inspections	Pole Brushing	poles brushed	WMP 512	\$ 377.86	\$ 404.76	\$ 7,262.42	\$ 8,045.06	1,656.00	1,774.00	31,828.00	35,258.00	\$ 533.63	\$ -	\$ 3,840.37	\$ 4,374.00	4,171.30	-	30,018.60	34,389.80
Emergency Preparedness	Suspension Resources and Services	NA	WMP 514	NA	NA	NA	\$ 4,640.87	NA	NA	NA	NA	NA	NA	NA	\$ 2,688.00	NA	NA	NA	NA
Emergency Preparedness	Aviation Flightlighting Program	NA	WMP 557	NA	NA	NA	\$ 8,015.51	NA	NA	NA	NA	NA	NA	NA	\$ 7,389.00	NA	NA	NA	NA
Wildfire Mitigation Strategy Development	Documentation and disclosure of wildfire-related data and algorithms	NA	WMP 521	NA	NA	NA	\$ 1,760.18	NA	NA	NA	NA	NA	NA	NA	\$ 532.00	NA	NA	NA	NA
Wildfire Mitigation Strategy Development	Allocation Methodology Development and Application	NA	WMP 523	NA	NA	NA	\$ 5,632.14	NA	NA	NA	NA	NA	NA	NA	\$ 1,383.00	NA	NA	NA	NA
Emergency Preparedness	Emergency preparedness plan	NA	WMP 1008	NA	NA	NA	\$ 19,833.58	NA	NA	NA	NA	NA	NA	NA	\$ 2,043.00	NA	NA	NA	NA
Community Outreach and Engagement	Community Engagement	NA	WMP 1337	NA	NA	NA	\$ 448.93	NA	NA	NA	NA	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Emergency Preparedness	Public emergency communication strategy	NA	WMP 563	NA	NA	NA	\$ 10,397.02	NA	NA	NA	NA	NA	NA	NA	\$ 200.00	NA	NA	NA	NA
Grid Design, Operations, and Maintenance	Early fault detection	nodes	WMP 1185	\$ 0.79	\$ -	\$ 3.24	\$ 3.99	6.00	-	26.00	32.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-
Grid Design, Operations, and Maintenance	Strategic Pole Replacement	poles	WMP 1189	\$ -	\$ 0.30	\$ -	\$ 0.30	-	1.00	-	1.00	\$ -	\$ -	\$ -	\$ -	-	-	-	-

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WMP O&M Direct Costs and Units				Variance O&M Costs				Variance O&M Units				Status	Methodology / Assumptions	Notes
2023 WMP Category	Initiative	Unit Type	WMP Tracking ID	Non-HFTD	WUI (Outside HFTD)	HFTD	Total	Non-HFTD	WUI (Outside HFTD)	HFTD	Total			
Wildfire Mitigation Strategy Development	Summarized Risk Map	NA	WMP 442	NA	NA	NA	\$ 4,056.06	NA	NA	NA	NA	Emergent	Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific. nor does it have units of work.
Situational Awareness and Forecasting	Air Quality Index	Sensors	WMP 970	\$ 10.95	\$ 10.95	\$ 43.81	\$ 65.71	1.00	1.00	4.00	6.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Situational Awareness and Forecasting	Weather Stations and NDVI Cameras	NA	WMP 447	NA	NA	NA	\$ 2,983.91	NA	NA	NA	NA	Proceeding as Planned	Authorized / Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific.
Grid Design, Operations, and Maintenance	Covered Conductor	miles	WMP 455	\$ -	\$ -	\$ 3,372.46	\$ 3,372.46	-	-	60.00	60.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	Microgrids	microgrids	WMP 462	\$ 402.06	NA	\$ 839.13	\$ 1,241.19	-	-	-	-	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	Advanced Protection	circuits	WMP 463	\$ -	\$ -	\$ 232.15	\$ 232.15	-	-	4.00	4.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	Hedline Clamps	clamps	WMP 464	\$ -	\$ 391.61	\$ 1,268.49	\$ 1,662.10	-	229.00	738.00	967.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	Generator Grant Programs	generators	WMP 466	\$ -	\$ -	\$ 5,464.97	\$ 5,464.97	-	-	805.00	805.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	Standby Power Programs	generators	WMP 468	\$ -	\$ -	\$ 12,711.75	\$ 12,711.75	-	-	362.00	362.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	Generator Assistance Programs	generators	WMP 467	\$ -	\$ -	\$ 262.22	\$ 262.22	-	-	250.00	250.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	Strategic Undergrounding	miles	WMP 473	\$ -	\$ -	\$ 429.17	\$ 429.17	-	-	72.00	72.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	O&M OH Hardening - Traditional Hardening	miles	WMP 475	\$ -	\$ -	\$ (4,156.26)	\$ (4,156.26)	-	-	(8.85)	(8.85)	Proceeding as Planned	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs. authorized costs and authorized units.	
Grid Design, Operations, and Maintenance	Transmission OH Hardening- DUB	miles	WMP 545	\$ -	\$ -	\$ 0.41	\$ 0.41	-	-	21.50	21.50	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	Cleveland National Forest Fire Hardening	miles	WMP 1017	NA	NA	\$ 657.58	\$ 657.58	-	-	-	-	Emergent	Actual costs all shown in HFTD column.	
Grid Design, Operations, and Maintenance	LTE Communication Network (DCN)	stations	WMP 549	\$ 364.09	\$ 182.04	\$ 364.09	\$ 910.22	4.00	2.00	4.00	10.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	Lightning Arrestor Replacement	arrestors	WMP 550	\$ -	\$ 0.70	\$ 84.93	\$ 85.63	-	18.00	2,184.00	2,202.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	Avian Protection	poles	WMP 972	\$ -	\$ 0.81	\$ 9.42	\$ 10.23	-	52.00	605.00	657.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	Distribution OH Detailed	inspections	WMP 478	\$ -	\$ -	\$ (12,586.78)	\$ (12,586.78)	-	-	(186,762.98)	(186,762.98)	Other	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs. authorized costs and authorized units.	The cost and units associated with this line item is for Wildfire Mitigation Plan (WMP) O&M associated with traditional inspection & preventative maintenance (e.g., HFTD Inspections & Repairs, infrared inspections). These costs and efforts have shifted to emergent programs, such as the Drone Inspection Program.
Grid Design, Operations, and Maintenance	Transmission OH Detailed Inspections	inspections	WMP 479	\$ -	\$ -	\$ 35.56	\$ 35.56	-	-	1,928.00	1,928.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	Infrared Inspections of Distribution Infrastructure	inspections	WMP 481	\$ -	\$ -	\$ 329.68	\$ 329.68	-	-	11,900.00	11,900.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	Distribution Woodstock Initiative	inspections	WMP 483	\$ -	\$ -	\$ 108.12	\$ 108.12	-	-	1,038.00	1,038.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	HFTD Tier 3 Distribution Pole Inspections	inspections	WMP 551	NA	NA	NA	\$ -	-	-	-	-			
Grid Design, Operations, and Maintenance	Drone Assessments of Distribution Infrastructure	inspections	WMP 552	\$ 268.06	\$ 4,990.58	\$ 48,037.58	\$ 53,301.22	77.00	1,435.00	13,799.00	15,311.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	Distribution OH Patrols	inspections	WMP 488	\$ -	\$ -	\$ 330.61	\$ 330.61	-	-	85,847.00	85,847.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Vegetation Management and Inspections	Fields Management	poles cleared	WMP 497	\$ -	\$ -	\$ 4,071.34	\$ 4,071.34	-	-	514.00	514.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	LiDAR Inspections of Vegetation around Distribution Infrastructure - Enhanced Inspections, Patrols and Trims	NA	WMP 484	NA	NA	NA	\$ 873.37	NA	NA	NA	NA	Emergent	Actual costs all shown in Total column.	
Vegetation Management and Inspections	Right Tree Right Place	NA	WMP 1325	NA	NA	NA	\$ 1,218.29	NA	NA	NA	NA	Emergent	Actual costs all shown in Total column.	
Vegetation Management and Inspections	Pole Brushing	poles brushed	WMP 512	\$ (155.77)	\$ 404.75	\$ 3,422.05	\$ 3,671.06	(2,515.20)	1,774.00	1,809.40	1,068.20	Proceeding as Planned	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Emergency Preparedness	Suppression Resources and Services	NA	WMP 514	NA	NA	NA	\$ 1,852.87	NA	NA	NA	NA	Proceeding as Planned	Authorized / Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific.
Emergency Preparedness	Aerial firefighting Program	NA	WMP 557	NA	NA	NA	\$ 626.51	NA	NA	NA	NA	Proceeding as Planned	Authorized / Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific.
Wildfire Mitigation Strategy Development	Documentation and disclosure of wildfire-related data and algorithms	NA	WMP 521	NA	NA	NA	\$ 1,228.18	NA	NA	NA	NA	Expanded	Authorized / Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific.
Wildfire Mitigation Strategy Development	Allocation Methodology Development and Application	NA	WMP 523	NA	NA	NA	\$ 4,249.14	NA	NA	NA	NA	Expanded	Authorized / Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific.
Emergency Preparedness	Emergency preparedness plan	NA	WMP 1008	NA	NA	NA	\$ 17,790.58	NA	NA	NA	NA	Proceeding as Planned	Authorized / Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific.
Community Outreach and Engagement	Community Engagement	NA	WMP 1337	NA	NA	NA	\$ 448.55	NA	NA	NA	NA	Emergent	Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific. nor does it have units of work.
Emergency Preparedness	Public emergency communication strategy	NA	WMP 563	NA	NA	NA	\$ 10,107.02	NA	NA	NA	NA	Expanded	Authorized / Actual costs all shown in Total column.	Initiative addresses all wildfire mitigation and PSPS across entire service territory and is not location specific.
Grid Design, Operations, and Maintenance	Early fault detection	Nodes	WMP 1185	\$ 0.75	\$ -	\$ 3.24	\$ 3.99	6.00	-	26.00	32.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	
Grid Design, Operations, and Maintenance	Strategic Pole Replacement	poles	WMP 1189	\$ -	\$ 0.30	\$ -	\$ 0.30	-	1.00	-	1.00	Emergent	Actual Units were based on GIS data, used unit splits for HFTD based on actual units, and applied to actual costs.	

Appendix 3



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na Point

CAPISTRANO BEACH

Capistrano Bight

MARBLEHEAD

RANCHO SAN CLEMENTE

CLEMENTE HILL

San Clemente

San Clemente Pier

San Clemente State Beach

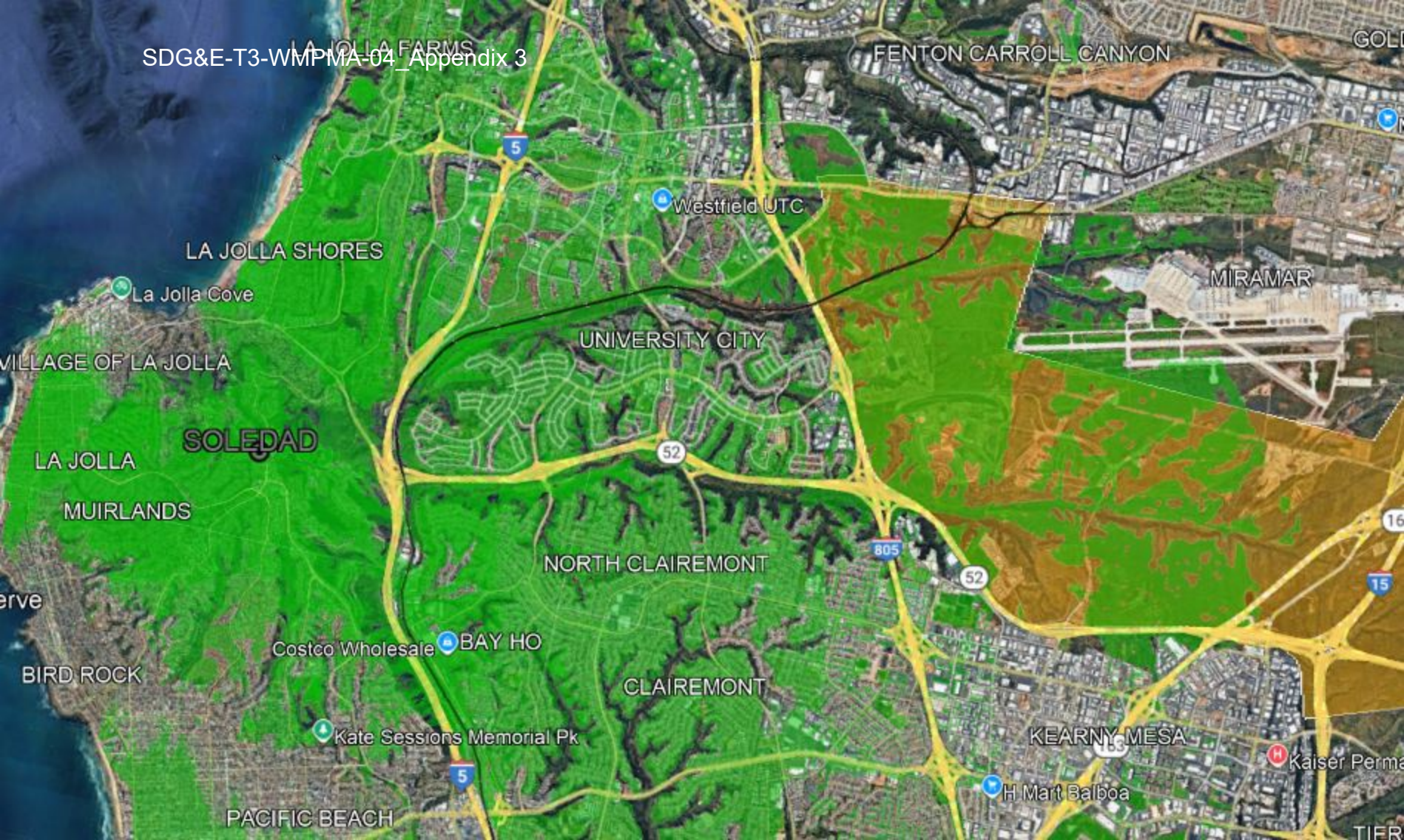
La Casa Pacifica

Talega Golf Club

Combat Town - Bravo 1 (Section 3)

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Google



LA JOLLA SHORES

La Jolla Cove

VILLAGE OF LA JOLLA

SOLEDAD

LA JOLLA

MUIRLANDS

erve

BIRD ROCK

Costco Wholesale

BAY HO

Kate Sessions Memorial Pk

PACIFIC BEACH

UNIVERSITY CITY

NORTH CLAIREMONT

CLAIREMONT

KEARNY MESA

H Mart Balboa

Kaiser Perma

FENTON CARROLL CANYON

Westfield UTC

MIRAMAR

GOLD

TIER



ORANGE COUNTY C&O

Talega Golf Club

Capistrano Bight

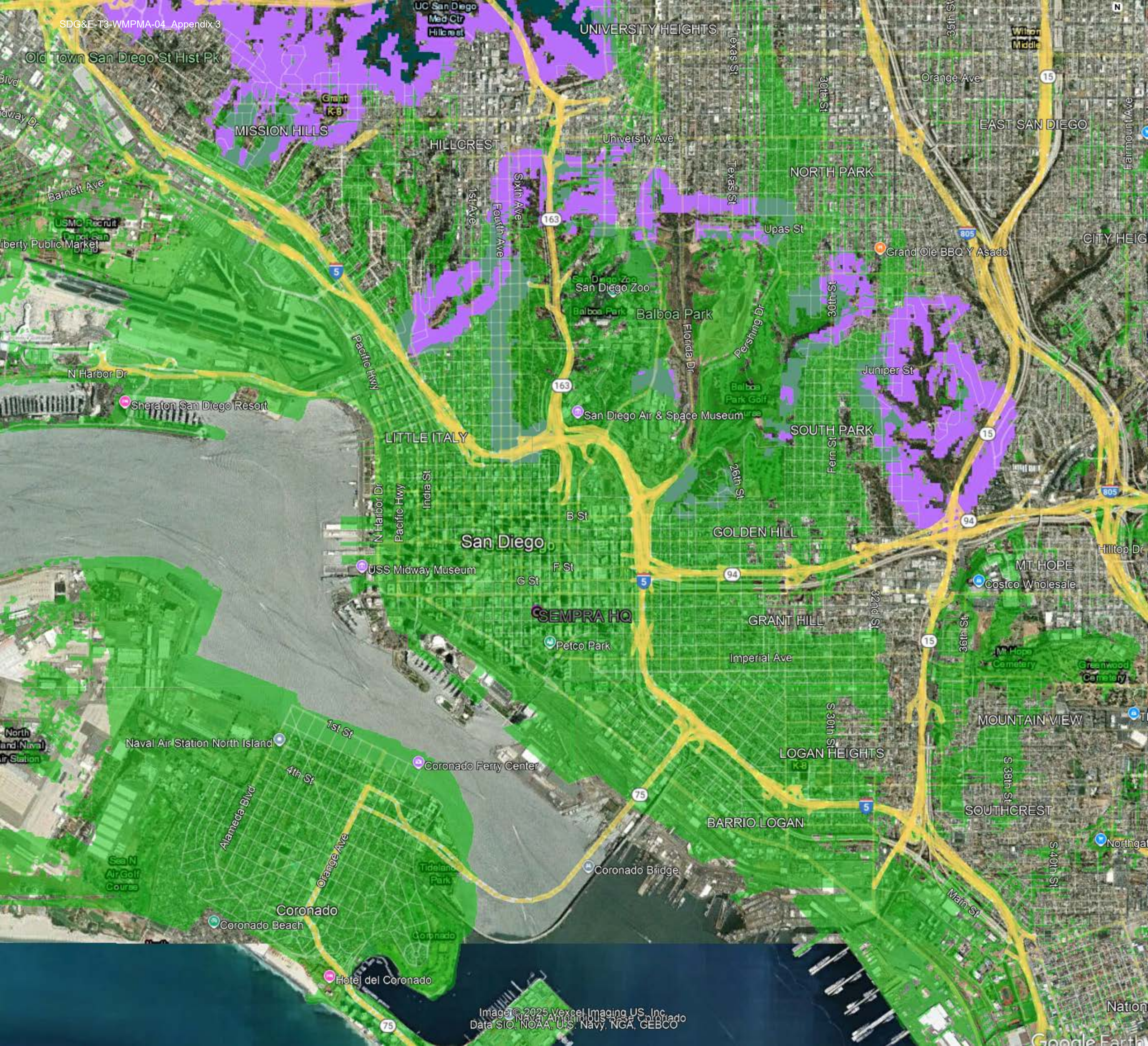
MARBLEHEAD

5

RANCHO SAN CLEMENTE

San Clemente

San Clemente Pier





Camp Pendleton North

STUART

Marine Memorial Golf Course

THE G

NORTH VALLEY

Camp Pendleton South

SAN LUIS REY

Data CSUMB SFML, CA OPC

Mission San Luis Rey

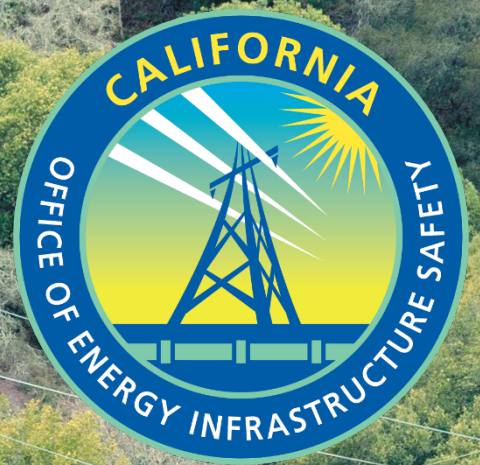
76

Appendix 4

WMP	ACI #	WMP Category	Title	Status	Deficiency Source	Source Link	Page Reference (Addressed in Document)	External Site (Addressed In Document)
WMP 2022	SDGE-22-01	Risk Assessment and Mapping	SDGE-22-01. Prioritized List of Wildfire Risks and Drivers	Resolved	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	Appendix D - Page 1-2	https://www.sdge.com/sites/default/files/regulatory/2024-06-07_SDGE_2023_WMP_R2.1.pdf?
WMP 2022	SDGE-22-02	Risk Assessment and Mapping	SDGE-22-02. Collaboration and Research in Best Practices in Relation to Climate Change Impacts and Wildfire Risk and Consequence Modeling.	Resolved	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	Appendix D - Page 3	https://www.sdge.com/sites/default/files/regulatory/2024-06-07_SDGE_2023_WMP_R2.1.pdf
WMP 2022	SDGE-22-04	Risk Assessment and Mapping	SDGE-22-04. Inclusion of Community Vulnerability in Consequence Modeling.	Resolved	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	Appendix D - Page 6	https://www.sdge.com/sites/default/files/regulatory/2024-06-07_SDGE_2023_WMP_R2.1.pdf?
WMP 2022	SDGE-22-05	Risk Assessment and Mapping	SDGE-22-05. Fire Suppression Considerations.	Resolved	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	Appendix D - Page 7	https://www.sdge.com/sites/default/files/regulatory/2024-06-07_SDGE_2023_WMP_R2.1.pdf?
WMP 2022	SDGE-22-06	Risk Assessment and Mapping	SDGE-22-06. Eight-Hour Fire Spread Simulations.	Resolved	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	Appendix D - Page 8	https://www.sdge.com/sites/default/files/regulatory/2024-06-07_SDGE_2023_WMP_R2.1.pdf?
WMP 2022	SDGE-22-07	Risk Assessment and Mapping	SDGE-22-07. Risk Prioritization for Mitigation Measures.	Resolved	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	Appendix D - Page 9	https://www.sdge.com/sites/default/files/regulatory/2024-06-07_SDGE_2023_WMP_R2.1.pdf?
WMP 2022	SDGE-22-08	Risk Assessment and Mapping	SDGE-22-08. Evaluation of Wildfire Risk Outside of the HFTD.	Resolved	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	Appendix D - Page 10	https://www.sdge.com/sites/default/files/regulatory/2024-06-07_SDGE_2023_WMP_R2.1.pdf?
WMP 2022	SDGE-22-09	Risk Assessment and Mapping	SDGE-22-09. Evaluation of Wind Gust Effects on Vegetation-Related Failures.	Resolved	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	Appendix D - Page 11-12	https://www.sdge.com/sites/default/files/regulatory/2024-06-07_SDGE_2023_WMP_R2.1.pdf?
WMP 2022	SDGE-22-10	Risk Assessment and Mapping	SDGE-22-10. Wildfire Consequence Modeling Improvements.	Resolved	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	Appendix D - Page 13	https://www.sdge.com/sites/default/files/regulatory/2024-06-07_SDGE_2023_WMP_R2.1.pdf?
WMP 2022	SDGE-22-14	Resource Allocation Methodology	SDGE-22-14. Grid Hardening Decision-Making Process Transparency.	Resolved	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	Appendix D - Page 17-19	https://www.sdge.com/sites/default/files/regulatory/2024-06-07_SDGE_2023_WMP_R2.1.pdf?
WMP 2022	SDGE-22-15	Resource Allocation Methodology	SDGE-22-15. Undergrounding Risk-Spend Efficiency Demonstration.	Resolved	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	Appendix D - Page 20-21	https://www.sdge.com/sites/default/files/regulatory/2024-06-07_SDGE_2023_WMP_R2.1.pdf?
WMP 2022	SDGE-22-25	Risk Assessment and Mapping	SDGE-22-25. Validation of Vegetation Risk Index (VRI).	Resolved	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	Appendix D - Page 31	https://www.sdge.com/sites/default/files/regulatory/2024-06-07_SDGE_2023_WMP_R2.1.pdf?
WMP 2022	SDGE-22-26	Risk Assessment and Mapping	SDGE-22-26. Validation of Wildfire Risk Reduction Model (WRRM).	Resolved	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	Appendix D - Page 32	https://www.sdge.com/sites/default/files/regulatory/2024-06-07_SDGE_2023_WMP_R2.1.pdf?
WMP 2022	SDGE-22-27	Resource Allocation Methodology	SDGE-22-27. Improvements to Capital Allocation Methodology.	Resolved	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	Appendix D - Page 33	https://www.sdge.com/sites/default/files/regulatory/2024-06-07_SDGE_2023_WMP_R2.1.pdf?
WMP 2022	SDGE-22-28	Resource Allocation Methodology	SDGE-22-28. Improvements to the RSE Verification Process.	Resolved	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	2025 WMP Update Pg 45-50	https://www.sdge.com/sites/default/files/regulatory/2024-07-05_SDGE_2025_WMP-Update_R2.pdf
WMP 2022	SDGE-22-30	Risk Assessment and Mapping	SDGE-22-30. Improvements to the WINGS-Ops and WINGS-Planning Models.	On Going	SDG&E 2022 WMP Update Decision	https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52635&shareable=true	2025 WMP Update Pg 65-84	https://www.sdge.com/sites/default/files/regulatory/2024-06-07_SDGE_2023_WMP_R2.1.pdf?
WMP 2021	SDGE-21-01	Risk Assessment and Mapping	SDGE-21-01: Inadequate transparency in accounting for ignition sources in risk modelling and mitigation selection	Resolved	WSD-019	https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M401/K606/401606125.pdf0Action St	6	https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2021-WMPs
WMP 2021	SDGE-21-02	Risk Assessment and Mapping	SDGE-21-02: Lack of consistency in approach to wildfire risk modeling across utilities	Resolved	WSD-019	https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M401/K606/401606125.pdf0Action St	7	https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2021-WMPs
WMP 2021	SDGE-21-09	Risk Assessment and Mapping	SDGE-21-09: Inadequate transparency associated with SDG&E's decision-making process	Resolved	WSD-019	https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M401/K606/401606125.pdf0Action St	24	https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2021-WMPs
WMP 2021	SDGE-21-10	Resource Allocation Methodology	SDGE-21-10: Insufficient detail regarding prioritization of HFTD in undergrounding and covered conductor mitigation efforts	Resolved	WSD-019	https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M401/K606/401606125.pdf0Action St	25	https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2021-WMPs
WMP 2021	SDGE-21-11	Resource Allocation Methodology	SDGE-21-11: RSE values vary across utilities	Resolved	WSD-019	https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M401/K606/401606125.pdf0Action St	26	https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2021-WMPs
WMP 2020	SDGE-20-01	Risk Assessment and Mapping	SDGE-1 – Higher number of ignitions related to balloon contact	Resolved	WSD-005	https://energysafety.ca.gov/wp-content/uploads/docs/wmp-2020/docs/340953513.pdf	53	https://www.sdge.com/sites/default/files/regulatory/SDGE%20WMP%20Supplemental%20Filing%202%2026%202021%20%28R.18-10-007%29.pdf
WMP 2020	SDGE-20-02	Risk Assessment and Mapping	SDGE-2 – Higher number of ignitions related to vehicle contact	Resolved	WSD-005	https://energysafety.ca.gov/wp-content/uploads/docs/wmp-2020/docs/340953513.pdf	54-56	https://www.sdge.com/sites/default/files/regulatory/SDGE%20WMP%20Supplemental%20Filing%202%2026%202021%20%28R.18-10-007%29.pdf
WMP 2020	SDGE-20-03	Risk Assessment and Mapping	SDGE-3 – Incorporate lessons learned into updates of its risk models	Resolved	WSD-005	https://energysafety.ca.gov/wp-content/uploads/docs/wmp-2020/docs/340953513.pdf	57-59	https://www.sdge.com/sites/default/files/regulatory/SDGE%20WMP%20Supplemental%20Filing%202%2026%202021%20%28R.18-10-007%29.pdf
WMP 2020	SDGE-GU-01	Resource Allocation Methodology	Guidance 1 – Lack of RSE Information WMPs contain sparse and sporadic detail regarding RSEs of WMP initiatives	Resolved	WSD-002	https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M340/K883/340883294.pdf	2-16	https://www.sdge.com/sites/default/files/regulatory/SDGE%20WMP%20Supplemental%20Filing%202%2026%202021%20%28R.18-10-007%29.pdf
WMP 2020	SDGE-GU-03	Risk Assessment and Mapping	Condition Guidance-3: Lack of Risk Modeling to Inform Decision-making	Resolved	WSD-002	https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M340/K883/340883294.pdf	2-4	https://energysafety.ca.gov/wp-content/uploads/docs/wmp-2020/sdge-wmp-remedial-compliance-plan-07-27-2020-r.18-10-007.pdf
WMP 2020	SDGE-GU-12	Resource Allocation Methodology	Guidance 12 – Lack of detail of long-term planning	Resolved	WSD-002	https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M340/K883/340883294.pdf	49-52	https://www.sdge.com/sites/default/files/regulatory/SDGE%20WMP%20Supplemental%20Filing%202%2026%202021%20%28R.18-10-007%29.pdf
WMP 2019	SDGE-19-12	Risk Analysis and Risk Drivers	SDGE-19-12	Resolved	SDG&E 2019 WMP Decision	https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M298/K908/298908547.PDF	p. 18	https://www.sdge.com/sites/default/files/regulatory/SDG%26%202020%20Wildfire%20Mitigation%20Plan%2002-07-2020_0.pdf

Date	Aircraft	Time of dispatch	Cancelled Time	Lift-Off	Resp. Time	Return time	Reason for Flight	Flight Hrs	Unavailable - Repair / Maint	Number of Dips	Number of Drops	Gallons of Water Dropped	Fuel Cycles	Landing Cycles	Fire Name/Comments
1/21/23	729	11:32:00					Fire								Cougar IC
1/22/23	729	15:07:00					Fire								Lyons IC
1/27/23	139	12:23:00		12:31:00	0:08	12:55:00	Fire	0.2		0	0	-	0	1	Elevator Fire
1/27/23	729	12:23:00													Elevator Fire
4/15/23	729	13:15:00					Fire								Japatul
4/15/23	129	13:15:00		13:30:00	0:15	13:37:00	Fire	0.1		0	0	-	0	1	Japatul
4/22/23	729	11:04:00					Fire								San Felipe Rd
4/22/23	129	11:04:00					Fire								San Felipe Rd
4/22/23	729	17:34:00		17:51:00	0:17	18:08:00	Fire	0.5		0	0	-	0	1	Otay Mountain
4/22/23	129	17:40:00		17:51:00	0:11	18:10:00	Fire	0.3		0	0		0	1	Otay Mountain
5/9/23	729	15:11:00													Jamul
5/9/23	129	15:20:00		15:35:00	0:15	15:50:00	Fire	0.2		0	0		0	1	Deer Springs
5/15/23	729	13:10:00					Fire								Valley Center
5/15/23	129	13:10:00													Valley Center
5/15/23	729	14:09:00													Ramona
5/15/23	129	14:09:00		14:16:00	0:07	14:30:00	Fire	0.1		0	0		0	1	Ramona
5/16/23	129	12:12:00													Valley Center
5/16/23	729	12:12:00													Valley Center
5/21/23	129	12:51:00		13:05:00	0:14	13:14:00	Fire	0.1		0	0		0	1	Carrizo Creek Rd
5/28/23	729	11:05:00		11:23:00	0:18	11:47:00	Fire								Shelter Valley
5/28/23	129	11:05:00		11:16:00	0:11	11:44:00	Fire	0.4		0	0	-	0	1	Shelter Valley
6/17/23	729	17:33:00		17:48:00	0:15	17:58:00	Fire	0.2		0	0	-	0	1	Montezuma
6/20/23	129	12:21:00		12:35:00	0:14	13:30:00	Fire	0.9		0	1	450	0	1	Campo
6/20/23	729	12:55:00		13:15:00	0:20	13:56:00	Fire	0.5		0	0	-	0	1	Rainbow
6/20/23	729	15:58:00		16:16:00	0:18	17:13:00	Fire	0.9		5	6	6,000	0	1	Wildland
6/22/23	729	11:02:00													
6/22/23	129	14:20:00		14:30:00	0:10	14:40:00	Fire	0.1		0	0	-	0	1	Lilac Rd
6/23/23	729	10:33:00		10:59:00	0:26	11:26:00	Fire	1.5		3	5	4,000	0	1	Wildland
6/24/23	729	14:59:00		15:14:00	0:15	15:19:00	Fire	0.1		0	0	-	0	1	Lawson Valley
6/24/23	729	17:53:00		18:07:00	0:14	18:44:00	Fire	0.5		2	2	2,400	0	1	Jamul
6/28/23	129	11:05:00		11:16:00	0:11	11:44:00	Fire	0.4		0		-			
6/28/23	729	11:05:00		11:23:00	0:18	11:47:00	Fire	0.4		0		-			
7/2/23	729	17:59:00					Fire								
7/2/23	729	18:45:00		19:00:00	0:15	19:29:00	Fire	0.3		0	0	-			Kuutpat Rd
7/2/23	129	16:01:00		16:13:00	0:12	19:05:00	Fire	2.4		21	22	13,200			Volcan Mtn Radio Tower
7/5/23	729	11:05:00					Fire								Monument Rd
7/6/23	729	15:42:00		16:00:00	0:18	16:19:00	Fire	0.3		0	0	-			Buena Creek Sugarbush
7/9/23	129	16:16:00		16:27:00	0:11	17:09:00	Fire	0.7		0	0	-			Vesper Rd
7/9/23	729	16:05:00		16:22:00	0:17	17:13:00	Fire	0.8		0	0				Lawson
7/10/23	729	14:56:00		15:10:00	0:14	15:25:00	Fire	0.2		0	0				Lawson
7/11/23	729	11:07:00					Fire			0	0	-			E Sierra Alta Wy
7/11/23	729	9:50:00					Fire			0	0				Jefferson Rd
7/12/23	729	17:05:00		17:21:00	0:16	18:29:00	Fire	1.1		9	9	11,200			I8 Hwy/Tavern Rd 6
7/12/23	729	12:04:00					Fire								Stonebridge Pkw
7/15/23	129	10:04:00		10:17:00	0:13	10:35:00	Fire	0.3		0	0	-			I-15N/Deer Springs Rd 15
7/15/23	729	10:04:00		10:22:00	0:18	10:27:00	Fire	0.1		0	0	-			Chariot 2
7/16/23	729	10:50:00		11:05:00	0:15	11:52:00	Fire	0.7		2	2	2,000			Chariot 2
7/18/23	129	13:47:00		13:58:00	0:11	14:34:00	Fire	0.6		0	1	500			Lilac Rd Valley_Center 57
7/18/23	729	13:14:00		13:33:00	0:19	14:51:00	Fire	1.3		5	7	7,000			Couser 2
7/21/23	729	14:22:00		14:32:00	0:10		Fire					-			Couser 2
7/25/23	129	16:21:00		16:28:00	0:07	19:56:00	Fire	3.2		9	10	5,000			Queens
7/25/23	729	16:08:00		16:24:00	0:16	17:25:00	Fire	1.1		8	12	10,350			Shadow
7/26/23	129	16:01:00		16:19:00	0:18	19:41:00	Fire	3.0		15	15	9,000			Wildland
7/26/23	729	15:44:00		15:53:00	0:09	16:15:00	Fire	0.2		0	0	-			Potrero
7/26/23	729	12:08:00					Fire					-			Mesa IC
7/30/23	729	13:34:00		13:43:00	0:09	14:08:00	Fire					-			Ramona
8/1/23	729	11:28:00		11:47:00	0:19	12:12:00	Fire					-			Ranch
8/2/23	129	19:27:00		19:38:00	0:11	20:25:00	Fire	0.7		1	2	1,150			Windsong
8/2/23	729	19:20:00		19:32:00	0:12	20:17:00	Fire	0.7		2	3	1,950			Calle Oro Verde
8/3/23	729	11:45:00		11:55:00	0:10	12:22:00	Fire	0.4		0	0	-			Calle Oro Verde
8/6/23	729	11:29:00					Fire					-			Cole Fire
8/7/23	729	14:11:00					Fire					-			Slaughterhouse Canyon
8/7/23	729	13:02:00		13:14:00	0:12	13:33:00	Fire	0.3		0	0	-			San Pasqual Valley Rd
8/7/23	729	11:23:00		11:39:00	0:16	12:03:00	Fire	0.3		0	0	-			Airway IC
8/7/23	729	18:35:00		18:45:00	0:10	20:03:00	Fire	1.3		5	5	4,900			Border 23
8/8/23	729	12:47:00													Border 24
8/9/23	729	11:20:00		11:37:00	0:17	15:30:00	Fire	3.1		18	20	25,650	1	1	Faraway
8/11/23	729	14:31:00		14:45:00	0:14	15:04:00	Fire	0.3		0	0	-			San Vicente Rd / Bunnie King Ln
8/15/23	729	10:50:00					Fire								I 15S / Old Hwy 395
8/16/23	729	11:14:00					Fire								Rice
8/17/23	729	13:32:00		13:47:00	0:15	18:33:00	Fire	2.2		31	37	59,100			Willow
8/17/23	129	15:13:00		15:21:00	0:08	19:47:00	Fire	4.0		40	41	20,500			Coyote
8/18/23	729	9:05:00		9:25:00	0:20	11:12:00	Fire	2.1		19	32	28,000			Coyote
8/18/23	729	12:31:00		12:48:00	0:17	15:08:00	Fire	2.2		24	34	35,150			Coyote
8/25/23	729	16:00:00		16:14:00	0:14	16:52:00	Fire	0.6		1	1	800			Coyote
9/1/23	729	16:15:00	16:27:00				Fire								Oaks Fire
9/1/23	729	13:47:00	14:02:00				Fire								Stonefield Dr San Miguel
9/3/23	729	14:43:00	14:53:00	14:53:00	0:10	14:53:00	Fire								Running Creek LN Deer Springs 3
9/7/23	729	9:25:00		9:48:00	0:23	9:53:00	Fire	0.1		0	0	-			Wilgen Dr/ Harmony Grove Rd
9/7/23	129	9:25:00		9:41:00	0:16	9:57:00	Fire	0.2		0	0	-			Chocolate Summit Dr. Fire
9/7/23	729	10:58:00	11:08:00				Fire								Potrero Valley Rd. Fire
9/24/23	729	12:50:00	13:00:00				Fire								Hw 78 / Magnolia Av 6
9/29/23	729	17:04:00	17:19:00				Fire								1611 Wood Valley Road
10/5/23	729	13:19:00	13:29:00				Fire								Escondido
10/6/23	729	15:33:00	15:46:00				Fire								15000 Old Milky Way
10/13/23	729	12:35:00	12:48:00				Fire								
10/27/23	729	11:36:00	11:40:00				Fire								
10/28/23	729	14:18:00	14:30:00				Fire								
10/29/23	729	15:31:00		15:44:00	0:13	17:47:00	Fire	2.0		18	20	26,500			Border 34/Olay IC
11/1/23	129	16:54:00		17:06:00	0:12	17:24:00	Fire	0.2		0	0	-			White Wing Dr. Deerhorn
11/1/23	729	16:54:00		17:10:00	0:16	17:15:00	Fire	0.1		0	0	-			White Wing Dr. Deerhorn
11/3/23	729	14:01:00	14:16:00				Fire								Heritage Rd
11/8/23	729	10:30:00	10:35:00				Fire								S Santa Fe Ave
11/9/23	729	15:34:00		15:50:00	0:16	16:52:00	Fire	1.0		5	7	5,900			Marron Rd
11/10/23	729	11:30:00		11:45:00	0:15	12:58:00	Fire	1.2		6	6	7,100			Olay Brush Fire
11/11/23	729	12:22:00	12:30:00				Fire								Chula Vista
11/15/23	729	11:00:00	11:00:00				Fire								Lake Jennings Rd
11/20/23	729	9:23:00	9:30:00				Fire								Ramona
11/23/23	129	8:23:00	8:30:00				Fire								Shelter Valley
11/23/23	729	13:16:00	13:20:00				Fire								Rancho Santa Fe
11/23/23	129	13:47:00		14:01:00	0:14	16:15:00	Fire	1.9		16	17	9,899			Sage Fire
11/23/23	729	13:47:00		14:00:00	0:13	16:10:00	Fire	2.0		21	30	31,100			Sage Fire
11/26/23	129	13:59:00	14:09:00												

Appendix 6



OFFICE OF ENERGY INFRASTRUCTURE SAFETY COMPLIANCE GUIDELINES

SEPTEMBER 2023

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1.0 EXECUTIVE SUMMARY

This document sets forth the Office of Energy Infrastructure Safety's Compliance Guidelines.

1.1 Authority

The Office of Energy Infrastructure Safety (Energy Safety) has authority under Government Code section 15475.6 to “adopt guidelines setting forth the requirements, format, timing, and any other matters required to exercise its powers, perform its duties, and meet its responsibilities described in Sections 326, 326.1, and 326.2 and Chapter 6 (commencing with Section 8385) of Division 4.1 of the Public Utilities Code....”

1.2 Purpose and Scope

Pursuant to Public Utilities Code section 8386(b), electrical corporations must annually prepare and submit a Wildfire Mitigation Plan (WMP) to Energy Safety for review and approval. Subsequently, pursuant to section 8386.3(c), Energy Safety is charged with overseeing the electrical corporations' compliance with the WMP. Energy Safety's Compliance Guidelines set forth substantive and procedural requirements for electrical corporations both during and after the annual compliance period.

2.0 DEFINITIONS

“Budget” – The amount of money the electrical corporation estimated, in its WMP or in its change orders, that it would spend on an initiative.

“Change Order” – An electrical corporation's request for Energy Safety approval to change or update mitigation initiatives from its approved WMP prior to submission of a subsequent WMP or Update based on an updated understanding of risk.

“Commitment” – Within the WMP, an action that the electrical corporation states it will or plans to accomplish within the compliance period. The commitment may be quantitative or qualitative in nature. Commitments include targets.

“Compliance period” – January 1 to December 31 of e each calendar year.

“Defect” – Deficiencies, errors, or conditions that increase the risk of ignition posed by electrical lines and equipment requiring correction.

“Expenditure” – The amount of money spent by the electrical corporation on a WMP initiative within the compliance period.

“Goals” – The electrical corporation’s general intentions and ambitions.

“Initiative” – Measure or activity, either proposed or in process, designed to reduce the consequences and/or probability of wildfire or PSPS.

“Notice” – A formal notification to an electrical corporation in which Energy Safety identifies and communicates the existence of one or more violations or defects.

“Objective” – Specific, measurable, achievable, realistic, and timely outcomes for the overall WMP strategy, or mitigation initiatives and activities that a utility can implement to satisfy the primary goals and subgoals of the WMP program.

“Target” – A forward-looking, quantifiable measurement of work to which an electrical corporation commits to in its WMP. Electrical corporations will show progress toward completing targets in subsequent reports, including QDRs and WMP Updates.

“Violation” – Noncompliance with an electrical corporation’s approved WMP or any law, regulation, or guideline within Energy Safety’s authority.

3.0 NOTICES OF VIOLATION OR DEFECT

The requirements, standards, and protocols stated in this section apply to all notices issued after the effective date of these Guidelines.

3.1 Notice

Energy Safety may determine that a regulated entity is not in compliance with any matter under the authority of the office.¹ Energy Safety may issue a notice of violation (NOV) when it identifies instances of noncompliance with the WMP or any law, regulation, or guideline within the authority of the Office or a notice of defect (NOD) when it identifies deficiencies, errors, or conditions that increase the risk of ignition posed by electrical lines and equipment.² Within the NOV or NOD, Energy Safety may direct the electrical corporation to correct any defect or noncompliance.³ The corrective action directed by Energy Safety may consist of a requirement to inspect, assess, or repair subject electrical corporation lines and equipment or records, and report the results of such inspection, assessment, or repair, including resultant planned or completed corrective actions.

Energy Safety may prescribe a timeframe for resolution of a violation or defect. If Energy Safety assigns a risk category to a violation or defect, then Energy Safety directs electrical corporations to correct the violations and defects discovered under the timelines provided in Table 1.⁴

Table 1: Energy Safety Violation and Defect Correction Timeline by Risk Category

Risk Category	Violation and Defect Correction Timeline
Severe	<ul style="list-style-type: none">• Immediate resolution
Moderate	<ul style="list-style-type: none">• 2 months (in HFTD Tier 3)• 6 months (in HFTD Tier 2)

¹ Gov. Code § 15475.1.

² Gov. Code § 15475.2; Gov. Code § 15475.4; Cal. Code Regs., tit. 14, § 29302.

³ Gov. Code § 15475.2.

⁴ CPUC Resolution SPD-7, Attachment 1, § 2.5.2, page 9.

Risk Category	Violation and Defect Correction Timeline
	<ul style="list-style-type: none"> 6 months (if relevant to worker safety and not in HFTD Tiers 2 or 3)
Minor	<ul style="list-style-type: none"> 12 months or resolution scheduled in WMP update

3.2 Informal Conference

Electrical corporations may request an informal conference with Energy Safety’s Compliance Assurance Division for the purpose of disputing any issues raised in an NOV or NOD no later than five (5) business days before the response deadline identified in Section 3.3. When scheduling such a conference, an electrical corporation must clearly identify the following:

- (1) The NOV or NOD number.
- (2) Which violation(s) or defect(s) within the NOV or NOD identified in (1) are to be discussed.
- (3) The factual, substantive basis for the conference.
- (4) Materials the electrical corporation plans to present or cover in the conference, including copies of such materials.
- (5) Electrical corporation personnel expected to attend the conference, including their titles or roles within the organization.
- (6) The requested duration of the conference.
- (7) Dates and times the electrical corporation is available to hold the conference.

Requests for informal conferences with Energy Safety must be e-mailed to Compliance@energysafety.ca.gov, with a copy sent to all Energy Safety’s Compliance Assurance Division staff identified in the subject NOV or NOD. Electrical corporations are encouraged to schedule a conference at the earliest possible time to assure an expeditious resolution of any issues. Electrical corporations may submit supplemental information no later than 2 business days before the informal conference occurs. An informal conference does not extend the response deadline.

3.3 Response

Upon receipt of an NOV or NOD the electrical corporation must:

(a) Within 30 calendar days,⁵ for each violation or defect identified, provide a written response to Energy Safety that states either:

- (1) The electrical corporation corrected or plans to correct the violation or defect, including a description of all corrective actions taken or planned and the timeline for completing those actions, or
- (2) The electrical corporation will not correct the violation or defect, including the electrical corporation's reasoning or justification for inaction and all supporting documentation.

(b) If the electrical corporation either has corrected or plans to correct the violation or defect, the electrical corporation must send Energy Safety documentation that provides sufficient assurance of the correction within 30 calendar days of correcting the violation or defect. If the electrical corporation corrected the violation or defect before Energy Safety served the NOV or NOD, then the electrical corporation must provide documentation of the correction within 30 days of receiving the NOV or NOD. Examples of documentation that may provide assurance of completion of corrective action include, but are not limited to:

- (1) Before and after photographs demonstrating that the violation or defect has been corrected.
- (2) A corrected version of a dataset, record, or document identified in an NOV or NOD as erroneous or deficient.
- (3) Work orders or other records documenting the action taken, the date that action was taken, and a point of contact who can provide additional information regarding the action taken.

All files submitted by electrical corporations in accordance with (a) and (b) above must be named and submitted as required in Section 8 below.

⁵ Any deadline that falls on a Saturday, Sunday, or holiday as defined in Government Code section 6700 shall be moved to the following business day.

4.0 ELECTRICAL CORPORATION ANNUAL REPORT ON COMPLIANCE

The requirements, standards, and protocols outlined in this section are applicable to the 2023 Compliance Period and subsequent Compliance Periods.

The Electrical Corporation Annual Report on Compliance (EC ARC) must be submitted to Energy Safety via e-filing three months after the end of the compliance period.⁶ Accordingly, the EC ARC is annually due on the State business day following March 31.⁷ See Section 8 for instructions on file submission and naming convention. The EC ARC is an electrical corporation's annual self-assessment of compliance with its approved WMP during the recently completed compliance period. The EC ARC must include:

1. A written narrative including:
 - a. A clear description of the electrical corporation's progress towards achieving the objectives for the three-year WMP plan cycle, as identified in its most recently approved WMP.⁸ Progress must be discussed individually for each stated objective.
 - b. A clear description of the electrical corporation's progress towards achieving the three-year objectives⁹ listed in the tables in Section 8 of its WMP, including all subsections, with completion dates¹⁰ within the recently completed compliance period. Each objective must be discussed individually and, at a minimum, include the following:
 - i. A listing of the initiative(s) and associated tracking identification numbers the electrical corporation is implementing to achieve the objective.

⁶ Pub. Util. Code, § 8386.3

⁷ March 31 is a State holiday. EC ARC submissions are due on the subsequent State business day.

⁸ See Section 4.2 of the 2023-2025 WMP Technical Guidelines available at: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>.

⁹ See section 8 of the 2023-2025 WMP Technical Guidelines, as further defined in tables for each subsection (i.e., 8.1, 8.2, etc.) in the column titled "Objectives for Three Years" (see exemplar Table 8-1 on page 77 of 2023-2025 WMP Technical Guidelines).

¹⁰ The date listed in the "Completion Date" column in the associated tables in Section 8 of the WMP.

- ii. Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective are documented and substantiated.
 - iii. The completion date listed in the approved WMP.
 - iv. A summary of the electrical corporation's progress made during the most recently completed compliance period.
- c. A detailed assessment of the electrical corporation's completion of the three-year objectives⁹ listed in the tables in Section 8 of its WMP, including all subsections, with completion dates¹¹ within the most recently completed compliance period. Each stated objective must be discussed individually and, at a minimum, include the following information:
 - i. A listing of the initiatives and associated tracking identification numbers the electrical corporation is implementing to achieve the objective.
 - ii. Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective are documented and substantiated.
 - iii. The completion date listed in the approved WMP.
 - iv. The date the electrical corporation actually completed the objective.
 - v. An explanation of how the electrical corporation utilized the identified "Method of Verification"¹² to assess the completion of the objective.
 - vi. A summary of the electrical corporation's assessment of progress towards completing the objective following use of the verification method identified in v above, including a listing of all evidence relied upon in the electrical corporation's assessment.
 - vii. For each objective that the electrical corporation failed to complete, a detailed explanation of what was incomplete, the reason the initiative was not completed, and associated corrective actions the electrical corporation has taken to prevent recurrence of such failures.

¹¹ The date listed in the "Completion Date" column in the associated tables in Section 8 of the WMP.

¹² The value listed in the "Method of Verification" column in the associated tables in Section 8 of the WMP. See 2023-2025 WMP Technical Guidelines, pages 75-77.

1. If the electrical corporation did not take corrective action to prevent recurrence of such failures, it must explain its justification for such inaction.
- d. An assessment of the electrical corporation's completion of all targets¹³ identified for each initiative listed in the tables in Section 8 of its WMP, including all subsections, with target completion dates within the most recently completed compliance period.¹⁴ The assessment of each target must be discussed individually and, at a minimum, include the following information:
- i. A complete listing of all applicable targets.
 - ii. The target value and associated target units.
 - iii. The target completion date (i.e., year-end, Q2, Q3, etc.) listed in the WMP.
 - iv. The date the electrical corporation actually completed the target.
 - v. An explanation of how the electrical corporation utilized the identified "Method of Verification"¹⁵ to assess the completion of the target.
 - vi. A summary of the electrical corporation's assessment of completing the target following use of the verification method identified in v above, including a listing of all evidence relied upon in the electrical corporation's assessment.
 - vii. For each target that the electrical corporation failed to complete, a detailed explanation of what was incomplete, why, and associated corrective actions the electrical corporation has taken to prevent recurrence of such failures.
 1. If the electrical corporation did not take corrective action to prevent recurrence of such failures, it must explain its justification for such inaction.

¹³ See section 8 of the 2023-2025 WMP Technical Guidelines, as further defined in tables for each subsection (i.e., 8.1, 8.2, etc.) in columns containing the terms "Target" and "Unit" (see exemplar Tables 8-3 and 8-4 on page 79 of 2023-2025 WMP Technical Guidelines).

¹⁴ For example, for the 2023 WMP compliance period, the pertinent columns from exemplar Tables 8-3 and 8-4 in the 2023-2025 WMP Technical Guidelines would include those titled: "2023 Target & Unit," "Target End of Q2 2023 & Unit," "Target End of Q2 2023 & Unit," and "End of Year Target 2023 & Unit."

¹⁵ The value listed in the "Method of Verification" column in the associated tables in Section 8 of the most recently approved WMP. See 2023-2025 WMP Technical Guidelines, pages 75-79.

- viii. An explanation of whether the expected percentage risk reduction,¹⁶ as listed in the WMP, was achieved during the most recently completed compliance period.
 - 1. If the expected percentage risk reduction was not achieved, the electrical corporation must explain why and discuss any corrective actions it has taken as a result.
 - 2. If the electrical corporation did not take corrective action, it must explain its justification for such inaction.
 - ix. An assessment of quality of implementation for initiatives that have a quality control/quality assurance component.
- 2. A complete listing of all change orders requested by the electrical corporation that were approved by Energy Safety. For each change order, the electrical corporation must include a description of the change requested, the date the electrical corporation requested the change order, and the date that Energy Safety approved the requested change order.
- 3. A list that includes the following information for each WMP initiative identified in the WMP:
 - a. Utility Initiative Tracking ID, per WMP Guidelines.
 - b. Initiative name.
 - c. Planned budget (as reported in the WMP or approved Change Order) for the compliance period.
 - d. Actual expenditure for the most recently completed compliance period.
 - e. If the difference between the actual expenditure and the planned budget is more than 10%, provide a detailed explanation of the reason or reasons for the discrepancy.

¹⁶ The value listed in the columns titled “x% Risk Impact” in the associated tables in Section 8 of the WMP, and correlated to the respective compliance period, for the identified target. See 2023-2025 WMP Technical Guidelines, pages 78-79.

5.0 INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE

The requirements, standards, and protocols outlined in this section are applicable to the 2023 Compliance Period and subsequent Compliance Periods.

In consultation with the Office of the State Fire Marshall (OSFM), Energy Safety must annually publish a list of independent evaluators with experience assessing the safe operation of electrical infrastructure before March 1. After Energy Safety publishes the list of independent evaluators, each electrical corporation must hire an independent evaluator from that list. The independent evaluator must review and assess the electrical corporation's compliance with its WMP and issue an independent evaluator annual report on compliance (IE ARC) by July 1.¹⁷ Each independent evaluator that is engaged in a contract with an electrical corporation to assess WMP compliance works under the direction of Energy Safety.

The following requirements apply to each electrical corporation:

- (a) Within five (5) business days following acceptance of a bid from an independent evaluator, each electrical corporation must disclose via email (compliance@energysafety.ca.gov) the following information for all contracts with the independent evaluator within the last three (3) years: date of contract execution, duration of the contract, scope of work, compensation rates, and total contract value.
- (b) Within three (3) business days following the execution of a contract with an approved independent evaluator, the electrical corporation must provide its contracted independent evaluator with a complete listing of all commitments within its most recently approved WMP.
- (c) Unless otherwise specified by the independent evaluator, within three (3) business days following receipt of a data request from the contracted independent evaluator, the electrical corporation must provide the information requested.

¹⁷ Pub. Util. Code § 8386.3(c)(2).

- (d) The electrical corporation must copy Energy Safety (compliance@energysafety.ca.gov) on all written communications between the electrical corporation and its contracted independent evaluator.
- (e) The electrical corporation must invite Energy Safety (compliance@energysafety.ca.gov) to all meetings between the electrical corporation and the respective contracted independent evaluator.
- (f) Electrical corporations are prohibited from viewing the independent evaluators' reports or related work products prior to Energy Safety receiving the reports. Energy Safety may allow electrical corporations to conduct a limited review before reports are published to ensure that confidential information has been appropriately redacted.

The following requirements apply to each selected independent evaluators throughout the IE ARC evaluations:

- (a) The independent evaluator must copy Energy Safety (compliance@energysafety.ca.gov) on all written communications between the independent evaluator and the electrical corporations with which it has a contract.
- (b) The independent evaluator must follow the directions of Energy Safety, including the terms in the Energy Safety developed RFQ scope of work and other direction regarding the form and contents of the report.
- (c) The independent evaluator must schedule and attend weekly meetings with Energy Safety.
- (d) For each meeting with Energy Safety, the independent evaluator must send a meeting agenda to the Energy Safety Compliance inbox (compliance@energysafetey.ca.gov) at least one business day prior to the meeting, and must send meeting minutes and presentation materials to the Compliance inbox within two business days after the meeting.
- (e) The independent evaluator must produce meeting minutes and interview notes for all interactions with the electrical corporations. The independent evaluator must then provide these materials to Energy Safety upon final delivery of its IE ARC.
- (f) Upon submission of its IE ARC, the independent evaluator must provide Energy Safety all files, documents, and evidence that the independent evaluator relied upon in reaching the conclusions in its IE ARC.
- (g) The IE ARC must clearly state the following dates:
 - a. Date of execution of the contract between the independent evaluator and electrical corporation; and

- b. Date of commencement of the independent evaluator's evaluation.

6.0 AUDITS

6.1 Substantial Vegetation Management Audit

The requirements, standards, and protocols outlined in this section are applicable to the 2021 Compliance Period and subsequent Compliance Periods.

Energy Safety annually conducts an audit of an electrical corporation's compliance with the vegetation management requirements in its approved WMP.¹⁸ Energy Safety refers to this audit as the Substantial Vegetation Management (SVM) audit.

Upon receipt of an electrical corporation's notice that its vegetation management work has been completed, Energy Safety will initiate an audit of the electrical corporation's vegetation management activities for the compliance period. Following completion of its audit, Energy Safety will provide the electrical corporation its findings, including any identified deficiencies. The electrical corporation must provide Energy Safety its Corrective Action Plan within 30 days of receipt of the audit, unless another date is specified by Energy Safety at the time of issuance. The electrical corporation's response must:

1. Include a description of the corrective actions the electrical corporation has taken or plans to take to correct or eliminate each deficiency identified in the audit, including supporting documentation; and
2. Be titled "[ELECTRICAL CORPORATION]'s [YEAR] SVM Audit Corrective Action Plan_MMDDYYYY."

Following receipt and review of the electrical corporation's response, Energy Safety will issue an audit report to the electrical corporation. The audit report will identify whether the electrical corporation substantially complied with the substantial portion of the vegetation management requirements in the applicable year.

¹⁸ Pub. Util. Code § 8386.3(c)(5)

For purposes of the SVM audit report, substantial compliance with the substantial portion of vegetation management requirements means that:

- 1) The electrical corporation's deficiencies, after considering its planned corrective actions, have not detracted from the electrical corporation's ability to achieve the objectives of its vegetation management programs;
- 2) The electrical corporation's effort to fulfill the vegetation management requirement constituted a good faith effort to comply with the vegetation management requirements in the approved WMP; and
- 3) The electrical corporation completed the large majority of the vegetation management requirements in its approved WMP.

6.2 Other Audits

Energy Safety may conduct other audits as necessary to evaluate electrical corporation performance to its WMP. Energy Safety will give notice of audits, including requirements for data submissions, to electrical corporations prior to commencement. Submission deadlines will be contained in the notice of audit.

7.0 ENERGY SAFETY ANNUAL REPORTS ON COMPLIANCE

The requirements, standards, and protocols outlined in this section are applicable to the 2021 Compliance Period and subsequent Compliance Periods.

Energy Safety presents the findings of its review of each electrical corporation's compliance with its WMP in its Annual Reports on Compliance (ARCs).¹⁹ The scope of Energy Safety's review in the ARCs is limited to the electrical corporations' performance during the applicable compliance period. Energy Safety will issue each electrical corporation's ARC no later than 18 months after receipt of the respective EC ARC.¹⁹

7.1 Elements of Analysis

¹⁹ Pub. Util. Code § 8386.3(c)(4)

In performing its review, Energy Safety considers the totality of all compliance evaluations and assessments for the compliance period. This includes all inspection, audit, investigation, and data analysis work performed by Energy Safety, as well as the EC ARC and the IE ARC for the compliance period. Energy Safety also reviews and considers information (1) provided by the electrical corporation and related to compliance with its WMP, (2) documented in Energy Safety's field inspections, (3) developed through Energy Safety's analysis of data provided by the electrical corporation, and (4) provided by the electrical corporation in response to information requests or during meetings with Energy Safety.

7.1 Evaluation Criteria

Energy Safety's ARCs evaluate whether the electrical corporation complied with its WMP. Energy Safety assesses an electrical corporation's compliance with discrete WMP commitments for each initiative and wholistically evaluates the electrical corporation's execution of the WMP. Energy Safety's evaluation considers the following:

- 1) Whether the electrical corporation implemented the wildfire mitigation initiatives in its approved WMP, including evaluating whether the electrical corporation funded and performed the commitments stated for each initiative.²⁰ Further, whether the electrical corporation prioritized completion of work with the highest potential for reducing wildfire risk.
- 2) Whether the electrical corporation achieved or sufficiently progressed its WMP objectives.
- 3) Wildfire risk reduction, including the performance of the electrical corporation's infrastructure relative to its wildfire risk, as measured by changes in the occurrence of events that correlate to wildfire risk.
- 4) Whether the electrical corporation made a good faith attempt to achieve its goals and comply with its WMP.
- 5) Whether the electrical corporation exhibited issues related to its execution, management, or documentation in the implementation of its WMP. This analysis may expand beyond the scope of any single WMP initiative.

²⁰ Energy Safety evaluates funding data to ensure electrical corporations are dedicating resources to their initiative commitments. Energy Safety does not evaluate whether the cost of implementing each electrical corporation's plan was just and reasonable.

8.0 FILE SUBMISSION & NAMING CONVENTION

The requirements, standards, and protocols stated in this section apply to all file submissions received after the effective date of these Guidelines.

All documents must be submitted to the relevant year's docket (e.g. documents related to the 2021 substantial vegetation management audit must be submitted to the docket titled 2021_SVM or to the compliance inbox).

Electronic file names submitted for the above processes and associated document/data submissions must follow the standardized electronic naming convention with an underscore between the character string as follows: "<name of electrical corporation_document name_YYYYMMDD [date of submission]_document type>." Electrical corporation names may be abbreviated as follows:

- "BVES" (Bear Valley Electrical Services)
- "LU" (Liberty Utilities)
- "HWT" (Horizon West Transmission)
- "LS" (LS Power Grid California)
- "PC" (PacifiCorp)
- "PGE" (Pacific Gas and Electric Company)
- "SCE" (Southern California Edison)
- "SDGE" (San Diego Gas and Electric)
- "TBC" (Trans Bay Cable)

See examples of electronic file names below.

Examples:

- Response to an NOV: "PGE_NOV-CAC5-2023-08-10-1159_20230905_Response", which refers to PG&E's response submitted on September 5, 2023 to NOV_CAC5_20230810_1159.
- EC ARC: "SCE_2023ARC_20240331", which refers to SCE's 2023 Annual Report on Compliance submitted on March 31, 2024.
- IE ARC: "PC_2023-WMP-IE-ARC_20230711", which refers to PacifiCorp's IE's ARC on the 2023 WMP submitted on July 11, 2023.

- Response to an SVM audit: “BVES_2021 SVM Audit Response_20230904”, which refers to BVES’ response submitted on September 4, 2023 to Energy Safety’s 2021 SVM Audit.

Table 2: Expected Electronic File Submission Locations

Document Type	Submission Location
“NOV Response” (Response to Notice of Violation)	Applicable NOV docket within Energy Safety’s E-Filing system
“NOD Response” (Response to Notice of Defect)	Applicable NOD docket within Energy Safety’s E-Filing system
“NOV Corrective Action” (Documentation supporting corrective action)	Email to compliance@energysafety.ca.gov or wIRe (Wildfire Information & Reporting Application for Energy Safety) as directed by Energy Safety.
“NOD Corrective Action” (Documentation supporting corrective action)	Email to compliance@energysafety.ca.gov or wIRe (Wildfire Information & Reporting Application for Energy Safety) as directed by Energy Safety.
“[ELECTRICAL CORPORATION NAME]’s [APPLICABLE WMP YEAR] ARC” (Annual Report on Compliance)	Applicable EC ARC docket within Energy Safety’s E-Filing system
“SVM Notice” (Notice from the electrical corporation that it completed a substantial portion of its vegetation management requirements)	Applicable SVM docket within Energy Safety’s E-Filing system
“[ELECTRICAL CORPORATION]’S SVM Audit Corrective Action Plan”	Applicable SVM docket within Energy Safety’s E-Filing system

Document Type	Submission Location
(Substantial Vegetation Management Audit Response)	
Data Request Responses	Email to compliance@energysafety.ca.gov or wIRe (Wildfire Information & Reporting Application for Energy Safety) as directed by Energy Safety.

9.0 ACCESSIBILITY

It is the policy of the State of California that electronic information be accessible to people with disabilities. Each person who submits information through Energy Safety’s e-filing system must ensure that the information complies with the accessibility requirements set forth in Government Code section 7405. Energy Safety will not accept any information submitted through the e-filing system that does not comply with these requirements.²¹

²¹ References to laws and regulations related to digital accessibility are available on the Department of Rehabilitation’s website [here](https://dor.ca.gov/Home/DisabilityLawsandRegulations) (<https://dor.ca.gov/Home/DisabilityLawsandRegulations>, accessed May 2, 2023). Also see the Department of Rehabilitation’s [resources on constructing digitally accessible content](https://www.dor.ca.gov/Home/ConstructingAccessibleContent) (<https://www.dor.ca.gov/Home/ConstructingAccessibleContent>, accessed May 2, 2023).

Appendix 7

Data Request Number: PAO-SDGE-408-WY2

Proceeding Name: A2205015_016-SoCalGas and SDGE 2024 GRC_Track 3

Publish To: Public Advocates Office

Date Received: 5/16/2025

Date Responded: 06/2/2025

Continued-Question 5

g. Please explain how the actual capital and O&M expenditures for the Emergency Preparedness Plan is allocated to the Wildfire and Climate Resilience Center, and provide a cost breakdown by HFTD and other applicable areas.

SDG&E Response 5g:

Of the \$16.686 million reported as “actual capital,” \$14.435 million was spent on the Wildfire and Climate Resilience Center. As the Wildfire & Climate Science organization expanded to accommodate the evolving need for wildfire and PSPS risk mitigation and new legislative and regulatory requirements, SDG&E responded to new demands for physical space and technology enhancements to support emergency operations, wildfire risk assessment, and community collaboration efforts to promote PSPS and wildfire resiliency. The Wildfire and Climate Resilience Center included a renovation of existing office space to house 65 full-time employees (FTE) directly supporting Wildfire Mitigation, Fire Science and Climate Adaptation, and Emergency Management, which is an increase from 30 FTEs in May 2019. The Center also includes SDG&E’s state-of-the-art Emergency Operations Center (EOC), where it implements its CEADPP and conducts all-hazard emergency operations including Public Safety Power Shutoffs. Additional information about the WCRC and its need and uses are found in Mr. Woldemariam’s testimony on pages JW-79 and JW-80.

Costs cannot be broken down by HFTD because they are not associated with physical units of work by location. They are, instead, directly related to SDG&E’s operations to build, maintain, and operate a grid in a manner that minimizes the risk of catastrophic wildfire posed by its electric power lines and equipment and foster innovation and collaboration to grow a community that is resilient and prepared.

Data Request Number: PAO-SDGE-408-WY2

Proceeding Name: A2205015_016-SoCalGas and SDGE 2024 GRC_Track 3

Publish To: Public Advocates Office

Date Received: 5/16/2025

Date Responded: 06/2/2025

Continued-Question 5

i. Please explain why the actual capital and O&M costs should be recoverable in this proceeding and why it is beneficial to ratepayers.

SDG&E Response 5i:

As the Wildfire & Climate Science organization expanded to accommodate the evolving need for wildfire and PSPS risk mitigation and new legislative and regulatory requirements, SDG&E responded to new demands for physical space and technology enhancements to support emergency operations, wildfire risk assessment, and community collaboration efforts to promote PSPS and wildfire resiliency. The Wildfire and Climate Resilience Center included a renovation of existing office space to house 65 full-time employees (FTE) – as of 12/31/2023 - directly supporting Wildfire Mitigation, Fire Science and Climate Adaptation, and Emergency Management, which is an increase from 30 FTEs in May 2019. The Center also includes SDG&E's state-of-the-art Emergency Operations Center (EOC), where it implements its CEADPP and conducts all-hazard emergency operations including Public Safety Power Shutoffs.

The WCRC also serves as a hub for collaborative research, development, and implementation of innovative solutions to build an energy system that can withstand the intensifying effects of climate change while supporting community safety and resiliency. For example, partnerships that influence the development of industry-leading situational awareness expertise and tools, like advanced weather modeling, and sophisticated risk modeling capabilities, like the WiNGS-Planning model, are fostered within the WCRC. The space has welcomed over 240 industry partners including academia, 89 community-based organizations, and more than 80 government agencies all with the goal of collaborating, sharing best practices and lessons learned, and enhancing wildfire mitigation tactics across the globe. Some examples of innovations include:

- Advanced weather monitoring through SDG&E's weather stations, which offer real-time data to better anticipate and address weather-related threats. The Company's systems use millions of historical weather data points dating back to 2010 to assist in training AI-based wind forecasting models, including one of the first AI-trained Santa Ana Wind Gust forecast models in the industry.
- AI and machine learning to help predict and mitigate wildfire impacts on the energy grid. For example, SDG&E conducts more than 10 million virtual wildfire simulations daily to inform operational wildfire risk models, and uses more than 3.8 million drone images of company infrastructure to train AI-based inspection models.

Data Request Number: PAO-SDGE-411-WY2

Proceeding Name: A2205015_016-SoCalGas and SDGE 2024 GRC_Track 3

Publish To: Public Advocates Office

Date Received: 5/20/2025

Date Responded: 06/05/2025

2. Regarding Chapter 1, p. JW-40, the Early Fault Protection shows that the Actual Capital was \$1.920 million, and the Actual O&M was \$4,000 with no Authorized Capital or Authorized O&M. The following questions refer to information found on pp. JW-40 through JW-42.

f. Please explain the reason for performing a portion of work outside of Tier 2 HFTD and Tier 3 HFTD.

SDG&E Response 2f:

Six of the installed units are located outside the High Fire-Threat District (HFTD). These units are linked to substation transformer Power Quality (PQ) monitors, which are physically installed at substations that may or may not be within the HFTD. However, each PQ monitor oversees all circuits connected to its associated transformer. Importantly, the circuits monitored by these six PQ units include circuits that pass through Tier 2 and Tier 3 areas. Therefore, while the monitors themselves are located outside the HFTD, they are specifically intended to monitor circuits with HFTD exposure, and the wildfire risk reduction benefits are tied to the HFTD.

Data Request Number: PAO-SDGE-412-WY2

Proceeding Name: A2205015_016-SoCalGas and SDGE 2024 GRC_Track 3

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Date Received: 5/20/2025

Date Responded: 6/5/2025

3. Referring to “Sites constructed outside the HFTD were scoped because they provide communications coverage for circuits in the HFTD” on pp. JW-43, and “The current communication system within the HFTD does not have the bandwidth to support some of the technologies deployed as wildfire mitigations, including APP (WMP.463) and FCP. In addition, there are gaps in coverage of third-party communication providers in the rural areas of eastern San Diego County that limit the ability to communicate with field personnel during RFW crew deployments and EOC activations. To mitigate this risk, the DCRI Program (WMP.549) was developed to deploy a privately-owned LTE network using licensed radio frequency spectrum, enhancing the reliability of the communication network” on PDF pg. 291, please explain the following:

c. Please explain why SDG&E chose not to install more base stations in Tier 2 HFTD and Tier 3 HFTD to provide communications coverage for circuits in HFTD. Instead, the company chose to install new base stations outside of HFTD despite knowing that the current communication system within HFTD does not have the bandwidth to support some of the technologies deployed as wildfire mitigation.

SDG&E Response 3c:

The deployment of base stations throughout the HFTD for SDG&E is carefully evaluated through radio frequency studies and topology studies. For communications to be available within the HFTD, a communication pathway that necessitated base stations outside the HFTD was needed to provide expanded coverage within the HFTD and/or a pathway for communications that would be built within the HFTD. More base stations will be built within the HFTD, but a carefully planned roll-out of base stations is needed to ensure that each base station can be immediately made useful and provide communications upon installation.

Data Request Number: PAO-SDGE-413-WY2

Proceeding Name: A2205015_016-SoCalGas and SDGE 2024 GRC_Track 3

Publish To: Public Advocates Office

Date Received: 5/29/2025

Date Responded: 06/12/2025

1. Please provide documentation regarding whether any new positions were created or new employees were hired to perform the work performed for each WMP initiative in Chapter 1. If yes, please provide the dates those employees were hired.

SDG&E Response 1:

SDG&E hired an additional thirty-five full-time employees between 2019 and 2022 and maintained those positions in 2023 within the Wildfire & Climate Science division. In addition, SDG&E hired an additional three employees in its Access and Functional Needs (AFN) department, largely to comply with regulatory requirements within the De-energization OIR.¹ Dates these employees were hired and the WMP initiatives they support are provided in PAO-SDGE-413_Attach_Q1.

Additionally, SDG&E employee time spend on wildfire mitigation increased, resulting in incremental hours and additional hires of employees not allocated 100% to wildfire mitigation. Outside of the aforementioned new hires in the Wildfire & Climate Science division and the AFN department, SDG&E is not able to identify the hiring dates of additional employees charging labor to WMP-related activities, as they do so on an allocation basis and are not hired specifically for this purpose. The labor costs are a portion of the time that employee was working on WMP-related activities and does not provide for tracing the individual employee's name, hired date, and whether this position was a backfill or a new position.

Rulemaking 18-12-005, Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions (December 13, 2018); see D.21-06-034, Conclusions of Law 49 and 50 at 169.

Data Request Number: PAO-SDGE-413-WY2

Proceeding Name: A2205015_016-SoCalGas and SDGE 2024 GRC_Track 3

Publish To: Public Advocates Office

Date Received: 5/29/2025

Date Responded: 06/12/2025

8. Regarding Microgrid, please explain the following:

- b. Please explain the \$402,000 in non-HFTD areas and provide supporting documentation, including maps clearly marking lines serving communities in Tier 2 and Tier 3 HFTD areas with defined and highlighted boundaries.

SDG&E Response 8b:

The \$402,000 O&M spend was used to mitigate the impacts of Public Safety Power Shutoff (PSPS) events, with extended support to communities bordering the HFTD, who are susceptible to de-energization during PSPS events due to service lines traversing the Julian Tier 3 and Tier 2 HFTD areas. These communities are just outside of Tier 2 and include Shelter Valley, and Butterfield Ranch.

In Shelter Valley and Butterfield Ranch, In Front of the Meter (IFM) generation supported two branch-end microgrids. These microgrids delivered power to essential services including a gas station, a market, over 300 customers (including low-income, medical baseline, and CARE customers), a community center, and a state park.

Maps outlining the boundaries of the Shelter Valley and Butterfield Ranch microgrids are provided in PAO-SDGE-413_Attach_Q8b.

Data Request Number: PAO-SDGE-417-WY2

Proceeding Name: A2205015_016-SoCalGas and SDGE 2024 GRC_Track 3

Publish To: Public Advocates Office

Date Received: 6/13/2025

Date Responded: 6/27/2025

1. Referring to SDG&E's response to the Data Request PubAdv-SDGE-408-WY2, Q5g and Q5i, please answer the following:

a. Please provide the address for the current (and previous, if applicable) office building(s) location(s) used by the Wildfire and Climate Resilience Center. If any address is not a distinct building, please outline its precise current (and previous, if applicable) location on a map.

SDG&E Response 1a:

The Wildfire and Climate Resilience Center (WCRC or Center) is currently located on the first floor in Building 2 of SDG&E's Century Park (CP) campus at the address below. This location existed prior to the Center's construction and was renovated to accommodate the expansion of the Wildfire & Climate Science (WCS) organization.

There is no previous location for the WCRC as it did not exist prior to its construction in 2023. However, the departments that comprise the WCS organization – namely, Wildfire Mitigation, Fire Science & Climate Adaptation, and Emergency Management – were located in CP Building 3 and CP Building 6 at the following addresses. SDG&E's Emergency Operations Center, now in the WCRC, was also previously located in CP Building 6.

CP Building 2: 8315 Century Park Court, San Diego CA 92123

CP Building 3: 8330 Century Park Court, San Diego, CA 92123

CP Building 6: 8326 Century Park Court, San Diego CA 92123

Data Request Number: PAO-SDGE-417-WY2

Proceeding Name: A2205015_016-SoCalGas and SDGE 2024 GRC_Track 3

Publish To: Public Advocates Office

Date Received: 6/13/2025

Date Responded: 6/27/2025

1. Referring to SDG&E's response to the Data Request PubAdv-SDGE-408-WY2, Q5g and Q5i, please answer the following:

b. Please outline or highlight the current (and previous, if applicable) office building(s) location(s) for Wildfire Mitigation, Fire Science and Climate Adaptation, Emergency Preparedness Plan, Public Emergency Communication Strategy, and Emergency Management on a map or floorplan, including the floor number(s).

SDG&E Response 1b:

SDG&E clarifies that *Emergency Preparedness Plan* and *Public Emergency Communication Strategy* are WMP initiatives and not SDG&E departments. There is no physical location for these initiatives, although the personnel contributing work towards those initiatives are part of the WCS organization.

The entire WCS organization – including Wildfire Mitigation, Fire Science & Climate Adaptation, and Emergency Management – are located in the WCRC (exact location provided in part a. above. The floorplan shown below outlines where the WCRC is located withing Building 2 of SDG&E's CP campus. A detailed floorplan of where each department is located within the WCRC is provided in PAO-SDGE-417_Attach_Q1c_Floor_Plan (page 2).

Please see the attached file PAO-SDGE-417_Attach_Q1b for locations of the Wildfire Mitigation, Fire Science & Climate Adaptation, and Emergency Management departments prior to the WCRC opening. Wildfire Mitigation was located in Century Park Building 3 and Fire Science & Climate Adaptation and Emergency Management were located in Building 6.

Data Request Number: PAO-SDGE-417-WY2

Proceeding Name: A2205015_016-SoCalGas and SDGE 2024 GRC_Track 3

Publish To: Public Advocates Office

Date Received: 6/13/2025

Date Responded: 6/27/2025

SDG&E Response 1b: Continued



Data Request Number: PAO-SDGE-417-WY2

Proceeding Name: A2205015_016-SoCalGas and SDGE 2024 GRC_Track 3

Publish To: Public Advocates Office

Date Received: 6/13/2025

Date Responded: 6/27/2025

1. Referring to SDG&E's response to the Data Request PubAdv-SDGE-408-WY2, Q5g and Q5i, please answer the following:

c. Please explain whether \$14.435 million is the cost for renovating the entire building, or the portion occupied by the Wildfire and Climate Resilience Center, and provide all supporting documentation to support the total cost and the allocation of costs. The response should include:

- Project timeline and duration
- Invoices for construction or renovation work performed by contractors
- Documentation for any internal labor expenses
- A comparison between the original and the new floor plans for the entire building

SDG&E Response 1c:

The \$14.435 million is the cost for renovating the portion of the Building 2 occupied by the WCRC.

Project Timeline and Duration

Site Selection: December 2021 – March 2022

Architectural Firm Bid and Selection: March 2022 – April 2022

Programming: April 2022 – June 2022

Design: June 2022 – November 2022

Permitting: November 2022 – April 2023

General Contractor Firm Bid and Selection: March 2023 – May 2023

Construction: June 2023 – January 2024

For documentation of internal labor expenses, please see the attached file PAO-SDGE-417_Attach_Q1c_Internal_Labor.

Aside from an additional door added to the 2nd floor, the entirety of the 2nd floor of Building 2 was not renovated in conjunction with the WCRC project implementation. Accordingly, the 2nd level floor plan is not included with this response.

For a comparison between the original floorplan and the new WCRC floorplan, please see the attached file PAO-SDGE-417_Attach_Q1c_Floor_Plan.

Data Request Number: PAO-SDGE-417-WY2

Proceeding Name: A2205015_016-SoCalGas and SDGE 2024 GRC_Track 3

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Date Received: 6/13/2025

Date Responded: 6/27/2025

SDG&E Response 1c: Continued

For construction or renovation work performed by contractors, please see the following files which have been designated confidential.

Confidential and Protected Materials Pursuant to PUC Section 583, GO66-D Revision 2, and D.21-09-020 the accompanying declaration.

PAO-SDGE-417_Attach_Q1c_1_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_31_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_61_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_2_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_32_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_62_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_3_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_33_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_63_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_4_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_34_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_64_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_5_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_35_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_65_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_6_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_36_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_66_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_7_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_37_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_67_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_8_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_38_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_68_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_9_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_39_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_69_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_10_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_40_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_70_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_11_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_41_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_71_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_12_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_42_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_72_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_13_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_43_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_73_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_14_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_44_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_74_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_15_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_45_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_75_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_16_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_46_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_76_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_17_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_47_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_77_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_18_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_48_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_78_CONFIDENTIAL
PAO-SDGE-417_Attach_Q1c_19_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_49_CONFIDENTIAL	
PAO-SDGE-417_Attach_Q1c_20_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_50_CONFIDENTIAL	
PAO-SDGE-417_Attach_Q1c_21_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_51_CONFIDENTIAL	
PAO-SDGE-417_Attach_Q1c_22_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_52_CONFIDENTIAL	
PAO-SDGE-417_Attach_Q1c_23_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_53_CONFIDENTIAL	
PAO-SDGE-417_Attach_Q1c_24_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_54_CONFIDENTIAL	
PAO-SDGE-417_Attach_Q1c_25_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_55_CONFIDENTIAL	
PAO-SDGE-417_Attach_Q1c_26_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_56_CONFIDENTIAL	
PAO-SDGE-417_Attach_Q1c_27_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_57_CONFIDENTIAL	
PAO-SDGE-417_Attach_Q1c_28_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_58_CONFIDENTIAL	
PAO-SDGE-417_Attach_Q1c_29_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_59_CONFIDENTIAL	
PAO-SDGE-417_Attach_Q1c_30_CONFIDENTIAL	PAO-SDGE-417_Attach_Q1c_60_CONFIDENTIAL	

Data Request Number: PAO-SDGE-417-WY2

Proceeding Name: A2205015_016-SoCalGas and SDGE 2024 GRC_Track 3

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Date Received: 6/13/2025

Date Responded: 6/27/2025

1. Referring to SDG&E's response to the Data Request PubAdv-SDGE-408-WY2, Q5g and Q5i, please answer the following:

d. Please provide the justification for SDG&E's decision that maintaining the previous office arrangement for Wildfire Mitigation, Fire Science and Climate Adaptation, and Emergency Management was operationally insufficient or detrimental, along with all supporting documentation including any internal assessments, memos, or company decisions leading to decision.

SDG&E Response 1d:

SDG&E objects to the request to the extent it is overly broad and unduly burdensome, particularly with respect to the request for "any" and "all" documentation. SDG&E further objects to the request to the extent it seeks information that is cumulative and already publicly available in prior submissions or provided to Cal Advocates. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

The primary driver for renovating the existing CP 2 space to accommodate the WCS organization and the EOC was expansion of these departments by 35 employees and the need to modernize the EOC to incorporate industry standards and best practices for emergency management. One primary objective of bringing the three departments within WCS together was to gain synergies, find efficiencies, and promote collaboration in risk and emergency management utilizing situational awareness and risk analytics. The business justification for building the WCRC is provided below:

SDG&E Business Justification:

There are multiple purposes and benefits with the development of the Wildfire and Climate Resilience Center (WCRC), which will also serve as the organization's primary Emergency Operation Center (EOC). Rapidly changing climate conditions are changing the way we maintain and operate the electric system, and the WCRC will be a physical space that is committed to the climate resilience of our organization and communities we serve. This includes housing the Wildfire Science and Innovation Lab which collaborates with academia to advance climate science, and this will also be a resilience center focused on fostering community partnerships and educating stakeholders in the wildfire and climate community. This facility will also serve as a great venue to train SDG&E employees on the importance of wildfire safety and emergency preparedness.

Importantly, this space will also house the primary EOC for the organization and will be the central response hub for the organization when emergencies occur. Lastly, this will serve as a centralized workspace for all employees working in Wildfire Mitigation, Emergency Management, Fire Science and Climate Adaptation, increasing employee collaboration and innovation in this space.

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SDG&E Response 1d: Continued

Justification for Building the New Wildfire and Climate Resilience Center

San Diego Gas & Electric (SDG&E) has made the strategic decision to build a new Wildfire and Climate Resilience Center to replace the outdated Emergency Operation Center (EOC) that was originally constructed for Y2K back in 1999. This decision was driven by several critical factors that necessitated a modern and more capable facility to address the evolving challenges posed by climate change and the increasing frequency of extreme wildfire events impacting our electric system.

- **Outdated Technology and Space Constraints**

The original EOC, built over two decades ago, was designed to meet the technological needs of the time. However, the rapid advancements in technology have rendered the space outdated and inadequate for current operational requirements. The outdated technology hindered our ability to effectively manage and respond to emergencies, compromising the safety and reliability of our electric system. Additionally, the space constraints of the old EOC made it impossible to accommodate the growing number of personnel and equipment needed to handle the increasing complexity of emergency operations.

- **Increased Frequency of Extreme Wildfire Events**

One of the most significant changes since the construction of the original EOC has been the dramatic increase in the frequency and intensity of extreme wildfire events across California. These events have had a profound impact on our electric system, necessitating a more robust and specialized response capability. The new Wildfire and Climate Resilience Center is designed to address these challenges by providing state-of-the-art facilities and technology to enhance our situational awareness, forecasting, and coordination efforts.

- **Development of New Departments**

In response to the evolving regulatory landscape and the need for specialized expertise, SDG&E has established two new departments, and a new division: Wildfire and Climate Science. These organizations play a crucial role in leading our situational awareness and forecasting efforts, wildfire monitoring and coordination, Public Safety Power Shutoff (PSPS) resilience programs, and climate adaptation initiatives. The new center was needed to provide the necessary infrastructure and resources to support these departments in their mission to enhance our resilience to wildfires and climate-related events and keep our communities safe.

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SDG&E Response 1d: Continued

- **Compliance with Wildfire Mitigation Plans**

To meet the stringent regulations set forth in the Wildfire Mitigation Plans, SDG&E has also created a new Wildfire Mitigation Department. This department is dedicated to implementing and overseeing measures to reduce the risk of wildfires and ensure compliance with regulatory requirements. The new Wildfire and Climate Resilience Center will serve as the hub for these critical activities, providing a centralized location for coordination and collaboration.

- **Conclusion**

The decision to build the new Wildfire and Climate Resilience Center was a proactive and necessary step to ensure the safety, reliability, and resilience of our electric system in the face of evolving challenges. By addressing the limitations of the outdated EOC and providing state-of-the-art facilities and technology, SDG&E is better equipped to respond to emergencies, mitigate wildfire risks, and adapt to the impacts of climate change.

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Proceeding Name: A2205015_016-SoCalGas and SDGE 2024 GRC_Track 3

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Date Responded: 6/27/2025

1. Referring to SDG&E's response to the Data Request PubAdv-SDGE-408-WY2, Q5g and Q5i, please answer the following:

e. Please explain the cost-efficiency of the \$14.435 million renovation expenditure and provide all supporting documentation, including any internal reviews, benchmarks, or external evaluations of cost-efficiency.

SDG&E Response 1e:

Please see attached file labelled PAO-SDGE-417_Atach_Q1e¹.

Confidential and Protected Materials Pursuant to PUC Section 583, GO66-D Revision 2, and D.21-09-020 the accompanying declaration.

Also, please see the attached file marked for confidentiality: PAO-SDGE-417_Attach_Q1e_WCRC_RFP_CONFIDENTIAL.

As the Wildfire & Climate Science organization expanded to accommodate the urgent and evolving need for wildfire and PSPS risk mitigation and new legislative and regulatory requirements,² SDG&E responded to new demands for space and technology enhancements to support emergency operations, wildfire risk assessment, and community collaboration efforts to promote PSPS and wildfire resiliency. In 2023, SDG&E commenced construction of its Wildfire and Climate Resilience Center (WCRC), which brought together three distinct departments committed to fulfilling the goal to construct, maintain, and operate the electric system in a manner that minimizes the risk of catastrophic wildfire posed by its electric power lines and equipment.³ The WCRC included a renovation of existing office space to house 65 full-time employees (FTE) – as of 12/31/2023 - directly supporting Wildfire Mitigation, Fire Science and Climate Adaptation, and Emergency Management departments, which is an increase from 30 FTEs in 2019. The Center also includes SDG&E's state of the art Emergency Operations Center (EOC) where it conducts all-hazard emergency operations including Public Safety Power Shutoffs. SDG&E competitively bid the General Contractor for design and build of the WCRC and ultimately selected the most cost-competitive bidder based on multiple factors, of which the highest weighted factor was cost.

Generally speaking, SDG&E launches competitive bidding for Master Construction Service Agreements on an approximate 3-4 year cycle. Master Service Agreements are awarded to successful general contractors based on a variety of metrics, including fee

¹ Note, this attachment was also provided in response to Question 13a in TURN data request TURN-SEU-001.

² See Pub. Util. Code § 8386(c)(3).

³ See Pub. Util. Code § 8386(a)

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SDG&E Response 1e: Continued

percentages, labor rates, staff experience, safety record. Once these agreements are in place, SDG&E selects from this general contractor pool for the implementation of projects and in some cases will conduct competitive bidding amongst these general contractors for award of specific projects. The general contractors are required to competitively bid subcontractor trades whose estimated work value exceeds \$25K. SDG&E has also entered into Master Service Agreements for architectural and engineering design services, also awarded through a competitive bidding process. SDG&E selects from this design professional pool based on several factors including existing knowledge and familiarity with our facilities and associated design standards. Through these agreements and the competitive service cost structures contained therein, combined with competitive bidding of subcontracted building trades on a per project basis, SDG&E obtains a real time, best market value for the primary design and construction vendors involved in a project of this or comparable significance. In the case of the WCRC project, both General Contractor construction and Architectural/Engineering professional design services were competitively bid.

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Date Received: 6/13/2025

Date Responded: 6/27/2025

1. Referring to SDG&E's response to the Data Request PubAdv-SDGE-408-WY2, Q5g and Q5i, please answer the following:

f. Please explain how the original office buildings previously used for Wildfire Mitigation, Fire Science and Climate Adaptation, and Emergency Management were managed following the renovation of the Wildfire and Climate Resilience Center (WCRC). This should include details on whether the facilities were vacated, repurposed, reassigned, sold, or otherwise disposed of, along with any supporting documentation.

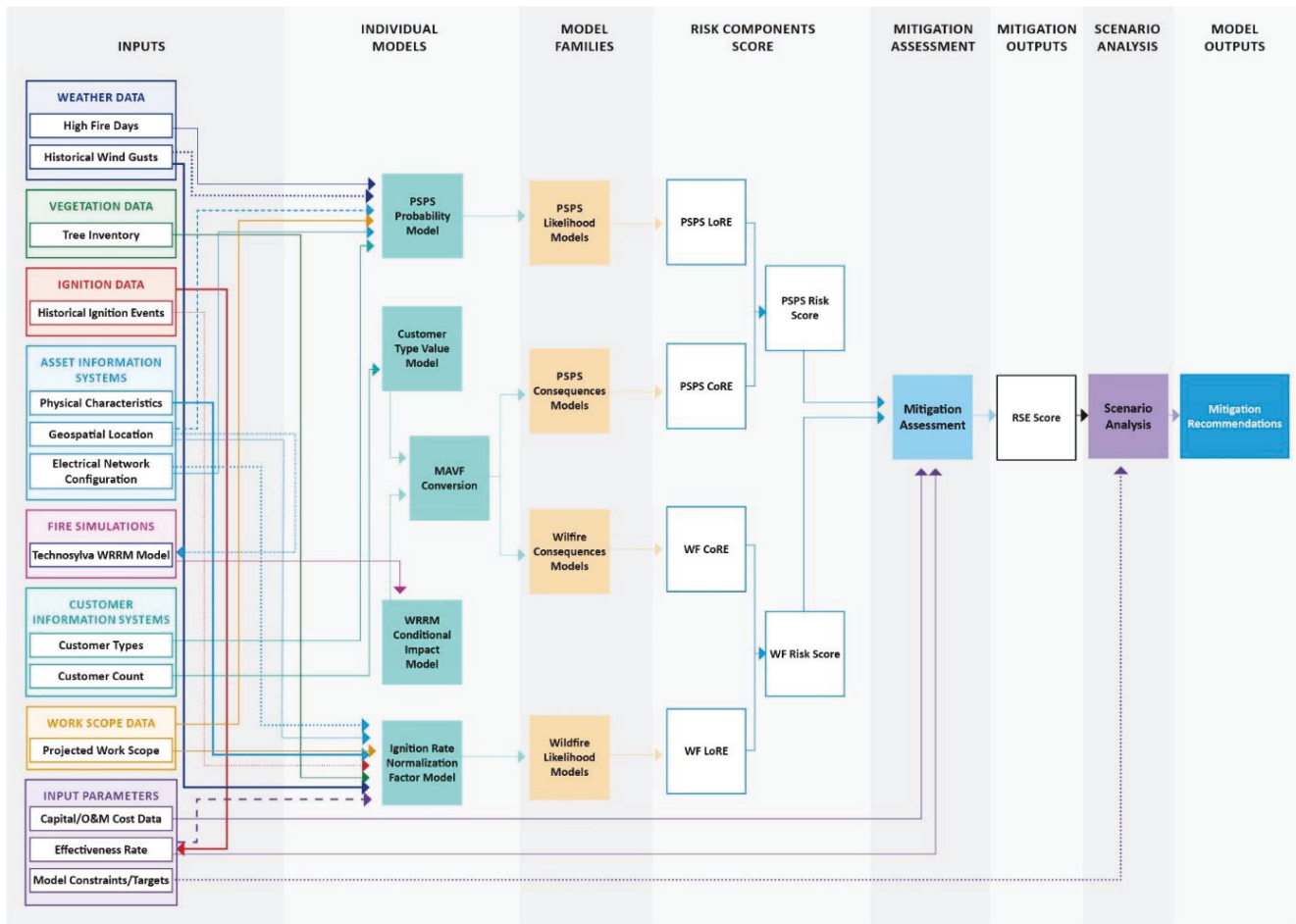
SDG&E Response 1f:

SDG&E objects to the request to the extent it seeks information outside the scope of this proceeding and not relevant nor reasonably likely to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

The current space within Building 6, Floor 1, where the Emergency Management and Fire Science and Climate Adaptation teams were previously located is subject to general office improvements that have been designed for beneficial use by other possible replacement groups. Competitive bidding for related construction services has not commenced and is pending a final determination on the disposition of the space. The current space within Building 3, Floor 1, where Wildfire Mitigation team members previously occupied was backfilled with other company employees. The costs associated with these subsequent moves were not recorded to SDG&E's WMPMAs.

Appendix 8

WINGS MODEL PROCESS



Source: SDG&E 2023-2025 Wildfire Mitigation Plan