2025 Risk Assessment Mitigation Phase

(Chapter SDG&E RAMP-5)

Climate Change Adaptation

May 15, 2025

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CHAPTER V: CLIMATE CHANGE ADAPTATION

I. INTRODUCTION

In 2024, the United States of America experienced 27 weather and climate disasters exceeding $1 billion in losses each, following the record-breaking 28 weather and climate disasters experienced in 2023.[1] Total losses due to extreme weather and climate events have grown since 1980. According to the U.S. Department of Commerce's National Oceanic and Atmospheric Administration, major U.S. loss events now happen every 2.7 weeks versus every 2.7 months a few decades ago.[2] Increased awareness of the importance of planning for these events amongst utilities has been growing, as these climate-driven events can have severe impacts on energy infrastructure. San Diego Gas & Electric Company (SDG&E or Company) accordingly is evaluating adaptive measures to visualize vulnerabilities, minimize impact and build resilience to future extreme events.

Projected climate hazards that will have short- and long-term ramifications in the San Diego region include extreme temperatures, extreme winds and precipitation (such as Santa Ana winds and atmospheric rivers), and sea level rise. SDG&E recognizes the need to adapt to these climate hazards to provide safe and reliable services to its customers and to mitigate the increasing risk through innovative, community-centric approaches.

Climate vulnerability refers to the susceptibility of SDG&E's infrastructure and operations to the change in climate hazards over their multiple dimensions, such as intensity, duration, and frequency. This includes factors such as the sensitivity of power lines to extreme heat, gusty winds, and heavy precipitation events, the exposure of gas pipelines to flooding and landslides, and the capacity of the utility to adapt to changing conditions, all of which are explored in the Climate Adaptation Vulnerability Assessment (CAVA). In contrast, climate risk refers to the consequences to human or ecological systems that results from the vulnerability of infrastructure and operations, as follows:

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1 NOAA, National Centers for Environmental Information, *U.S. Billion-Dollar Weather and Climate Disasters* (2025), *available at:* https://www.ncei.noaa.gov/access/billions/time-series.

2 *Id.* Measured by a change in the number of billion-dollar disasters happening annually. In the past 10 years, there were 19 billion-dollar disasters annually. From 1980-99, there was an average of 4.5 per year.

> In the context of climate change impacts, risks result from dynamic interactions between climate-related hazards with the exposure and vulnerability of the affected human or ecological system to the hazards.[3]

Climate risk integrates both the probability of climate hazard events and the potential consequences of energy delivery disruptions on the utility and the communities served. Understanding both concepts is crucial for developing and prioritizing effective strategies to plan for reliable and resilient energy services in the face of climate change.

The California Public Utilities Commission (CPUC or Commission) has two open proceedings that consider how utilities should incorporate potential climate change impacts in their risk assessment processes: the Risk-Based Decision-Making Framework (RDF) proceeding (Rulemaking (R.) 20-07-013) and the Order Instituting Rulemaking (OIR) to Consider Strategies and Guidance for Climate Change Adaptation (Climate Change Adaptation OIR) (R.18-04-019). In the Climate Change Adaptation OIR, SDG&E is directed to file the Company's first Climate Adaptation Vulnerability Assessment (CAVA) on the same day it files its 2025 Risk Assessment and Mitigation Phase (RAMP) Report.[4] Findings from the CAVA have been used to assist in identifying the types of impacts that future climate events may have across SDG&E's infrastructure, operations, and services. The development of the CAVA has also supported SDG&E's ongoing foundational work that seeks to improve SDG&E's internal capabilities to understand and analyze climate data in decision-making.

This chapter describes how activities related to Climate Adaptation impact the risks described in SDG&E's 2025 RAMP. The purpose of this chapter is to identify how climate change affects SDG&E's system and how the effects can potentially be addressed through adaptive actions. Climate change is recognized as a factor that can drive, trigger, or exacerbate multiple RAMP risks. Implementing climate change adaptation measures and integrating climate vulnerability considerations into RAMP controls and mitigations can enhance system longevity and reduce the severity of long-term negative climate impacts. In this chapter, SDG&E provides an overview of its climate change adaptation culture that examines, anticipates

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[3] *Id.*

[4] Decision (D.) 20-08-046 at 4 and Conclusions of Law (COL) 57 at 117.

and mitigates effects on its assets and operations, details key results from the CAVA, and identifies RAMP controls and mitigations that may address climate impacts.

II. CLIMATE CHANGE ADAPTATION CULTURE AT SDG&E

SDG&E's Fire Science and Climate Adaptation (FSCA) department was established in 2018 to respond to and strategize for increasing wildfire and climate-related risks. The department consists of meteorologists, fire coordinators, climate advisors, and project management personnel. SDG&E's FSCA group leads the CAVA efforts and climate adaptation-related activities within the company. SDG&E also established an inter-disciplinary and cross-departmental climate advisory group in 2019 that meets quarterly to act as a forum in which company leaders and decision-makers can discuss the expected impacts of climate change hazards on operations and develop innovative solutions to address them. SDG&E uses these meetings to promote climate change expertise in SDG&E leadership and better incorporate climate change information to maintain safe and resilient operations. In addition, the FSCA regularly engages with internal subject matter experts to determine if there are gaps in existing data for vulnerability assessment and adaptation planning. SDG&E also actively engages in partnerships with academic and research institutions to leverage cutting-edge expertise and further advance climate resilience initiatives.

III. CLIMATE ADAPTATION VULNERABILITY ASSESSMENT

SDG&E has a long history as a leader in understanding extreme weather and its impact on energy utilities. The Commission has taken targeted action in recent years to adequately respond to the threat of climate hazards and support energy utilities in their effort to become more resilient to those events. On May 7, 2018, the CPUC issued the Climate Change Adaptation OIR, which defined climate change adaptation for energy utilities and promoted efforts "to address climate change adaptation issues in Commission proceedings and activities to ensure safety and reliability of utility operations."[5] Building on this effort, the Commission issued D.20-08-046 on Energy Utility Climate Change Vulnerability Assessments and Climate Adaptation in Disadvantaged Communities in September 2020, to promote the use of the "best available climate science" to make informed decisions towards building resilient infrastructure

[5] R.18-04-019, Order Instituting Rulemaking to Consider Strategies and Guidance For Climate Change Adaptation (May 7, 2018) at 2.

and services to tackle climate change.[6] Furthermore, acknowledging the profound and unequal burden climate change places on Disadvantaged and Vulnerable Communities (DVCs) across the state, the CPUC defines DVCs within the decision and mandates robust utility engagement to empower and support these communities in building resilience. California investor-owned utilities (IOUs) are required to conduct a CAVA every four years, at a minimum, and their analyses must reflect the best available science. Additionally, IOUs are required to submit a Community Engagement Plan (CEP) and a Disadvantaged Survey Report.

On August 12, 2024, the CPUC issued D.24-08-005 to update climate change adaptation modeling requirements and refine the climate adaptation and vulnerability assessments.[7] This decision established the Shared Socioeconomic Pathway (SSP) 3-7.0 emissions scenario as the reference for energy utility use in the CAVA, adopted the Global Warming Level approach as the basis of CAVA planning in lieu of the targeted years approach, and updated the timing of CAVA submittal, requiring the assessment be filed a year prior to each utility's RAMP application, starting with PG&E's next CAVA in 2027.[8] SDG&E submitted its CEP in 2024 and is submitting its first CAVA concurrently with this RAMP filing, on May 15, 2025. The SDG&E CAVA addresses the requirements of the CPUC Climate Change Adaptation OIR and industry best practices for assessing physical climate risks.

This chapter provides an overview of the concurrently filed SDG&E CAVA, highlighting the methodology and key findings as they relate to the risks detailed in the following chapters. The results of CAVA serve primarily to identify assets at moderate- to high-vulnerability to climate hazards that could impact safe and reliable service and identify adaptation options for consideration.

Methodology

The CAVA aims to identify asset and operational vulnerabilities across the SDG&E system. The analysis focused on three key future years—2030, 2050, and 2070—and explored different possible climate futures, known as SSP scenarios. These scenarios, labeled SSP2-4.5, SSP3-7.0, and SSP5-8.5, represent varying levels of greenhouse gas emissions and their potential

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6 D.20-08-046 at 2.

7 D.24-08-005.

8 *Id*., COL 12 at 81.

impacts on the climate. The climate hazards of extreme heat, flooding (coastal and inland), and wildfire are considered for each electrical asset class. SDG&E electrical assets were grouped into five asset families: distribution, transmission, substations, communication, and facilities. [9] For gas asset classes, flooding (coastal and inland), wildfire, coastal erosion, and landslides are considered. Land subsidence has been determined to be of low consequence within the SDG&E service territory. SDG&E's analysis also examines cascading impacts. These are multifaceted compound weather and climate events that occur in succession and can lead to more significant impacts. Climate hazards listed as part of the CAVA analysis were determined by the CPUC in its Climate Change Adaptation OIR.

SDG&E conducted an analysis using data retrieved from Cal-Adapt, a tool provided by the state of California to visualize climate data and access a central repository of information. The primary dataset employed for this analysis was Localized Constructed Analogs, Version 2 (LOCA2), developed by the University of California San Diego Scripps Institution of Oceanography. LOCA2 is a high-resolution climate dataset specifically tailored to California. It enables detailed climate projections by downscaling global climate models to a finer resolution—approximately 3 kilometers (or 1/16th of a degree). This high level of detail is particularly valuable for understanding climate impacts in areas with complex terrain, such as mountains or valleys in the SDG&E service territory, and makes LOCA2 an indispensable resource for developing local-level strategies for climate adaptation and resilience.

As part of its exposure analysis, SDG&E examined the 90^{th}, 95^{th}, and 99^{th} percentiles of climate variables relative to the observed baseline period (1995-2014). These percentiles were analyzed to identify events with conditions far more severe than typical historical patterns. In the context of climate adaptation planning and the vulnerability assessment, SDG&E is analyzing events with outsized impacts and magnitudes relative to historical values rather than to pre-defined thresholds.

The methodology used in this analysis is aligned with the CPUC's guidance to consider asset exposure, sensitivity, and adaptive capacity to determine vulnerability. Forward-looking climate science information and subject matter expert input is applied to determine each of these components for individual assets. Exposure and sensitivity scores between 0-5 are determined

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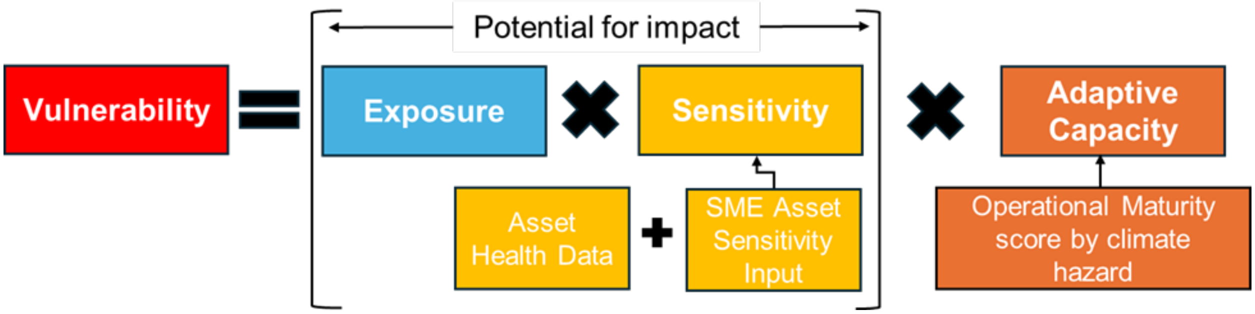
9 SDG&E's electric transmission assets are under the jurisdiction of the Federal Energy Regulatory Commission (FERC) and thus will not be addressed in SDG&E's Test Year 2028 General Rate Case.

for each asset based on the raw data. In turn, these scores serve to derive vulnerability scores from 0-25 that help identify the asset-hazard combinations that are considered priority vulnerabilities across SDG&E's system. This approach is shown below in Figure 1.

The key components of Figure 1 are defined as follows:

- Vulnerability: the susceptibility of SDG&E's infrastructure and operations to the change in frequency and/or magnitude of climate hazards.
- Exposure: the degree to which assets or regions may experience climate hazards based on their physical locations.
- Sensitivity: the degree to which an asset's integrity or operation could be adversely impacted in the event of hazard exposure.
- Adaptive Capacity: the degree to which the vulnerability of an asset is reduced due to the ability to mitigate climate hazards' negative outcomes based on the organization's operational maturity.

Figure 1: Vulnerability Assessment Approach



Extreme events linked with climate change also have a disproportionate impact on vulnerable communities, requiring utilities to understand and identify community vulnerability alongside asset vulnerability. Constructing a representative community vulnerability and adaptive capacity measurement that considers the nuances of DVCs requires a multi-layered approach. SDG&E built upon the DVC definition to address this challenge and created the Community Vulnerability Index (CVI). The CVI process starts with improving the default DVC indicators by increasing their granularity, enhancing data recency, and expanding coverage to include socioeconomic and tribal land metrics tailored to the SDG&E service area. Next, additional SDG&E-specific indicators, including Access and Functional Needs (AFN) customers and critical facilities, are added to reflect service area specific population needs and infrastructure readiness. The indicator set is also designed with future scalability in mind, anticipating the inclusion of San Diego region-specific factors. By focusing on temporal advancements, geospatial precision, expanded dimensions of vulnerability, and improved environmental metrics, the CVI can continue to evolve as a pioneering tool in resilience planning. These enhancements, coupled with meaningful community collaboration, will position the CVI and allow SDG&E to prioritize resilience measures and actions while aligning with industry best practices.

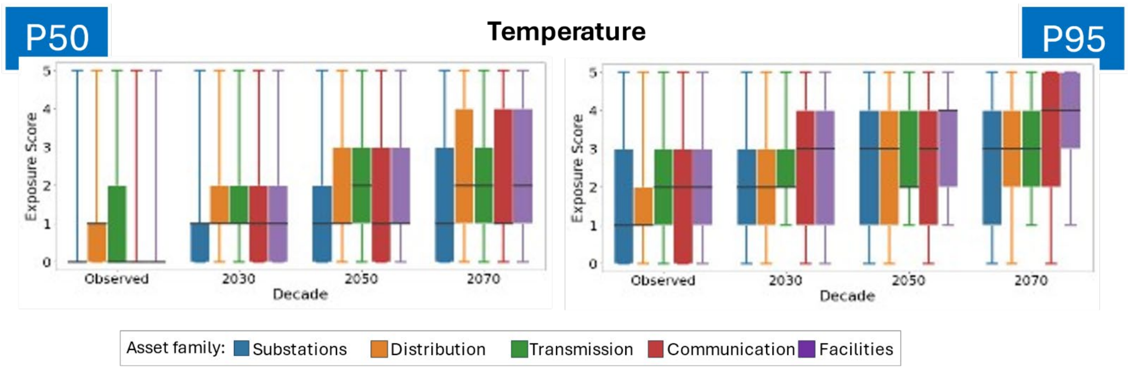
The Climate Change Adaptation OIR requires SDG&E and the other California energy utilities to conduct robust community outreach throughout the CAVA process. This stakeholder engagement includes interactions with local governments, community-based organizations, local tribal governments, and customers, among others, to corroborate the findings of the CAVA and facilitate a regional approach to climate adaptation. SDG&E's outreach efforts include holding workshops, conducting interviews, convening information sessions, and deploying surveys to provide ample opportunity for engagement and collaboration throughout the CAVA process, as appropriate.

Key Findings

Climate model projections across the service territory reveal how climate hazards may impact the SDG&E system. The following findings present an overview of exposure score distributions and vulnerability metrics to illustrate how different asset families may be affected over time. The following exposure plots in Figures 2-4 show the hazard-specific exposure scores for electrical assets for the observed baseline (1995-2014), 2030, 2050, and 2070 using the median model within the SSP3-7.0 scenario. Exposure score distributions are shown for the 50th percentile median-year case (P50) and 95th percentile extreme-year case (P95) for each time horizon.

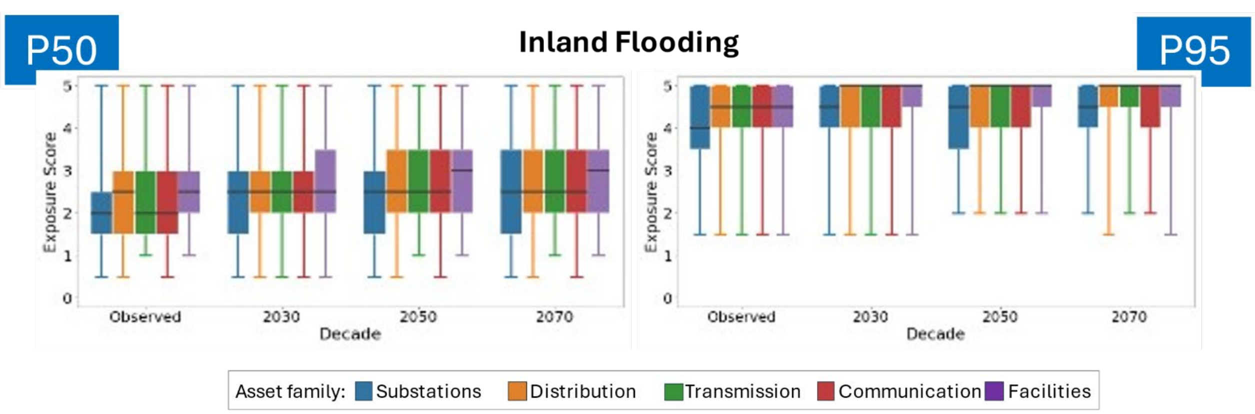
As temperatures warm, exposure to extreme heat is projected to increase steadily through the 21st century across the SDG&E service territory, with the greatest increase in the Inland and Mountain regions. The cooler Coastal region is projected to have the lowest exposure scores with the smallest increase, while the hotter Desert region is also projected to experience a small increase in exposure due to historically high exposure scores. Across all electrical asset families, temperature exposure scores are projected to increase over time. Using median-year (P50) temperature exposure scores, the communications and facilities asset families are projected to experience the greatest change in exposure magnitudes, while distribution and facilities are projected to experience the greatest change in extreme-year (P95) exposure magnitudes, as shown in Figure 2.

Figure 2: Temperature Exposure Score Distributions for Electrical Asset Families



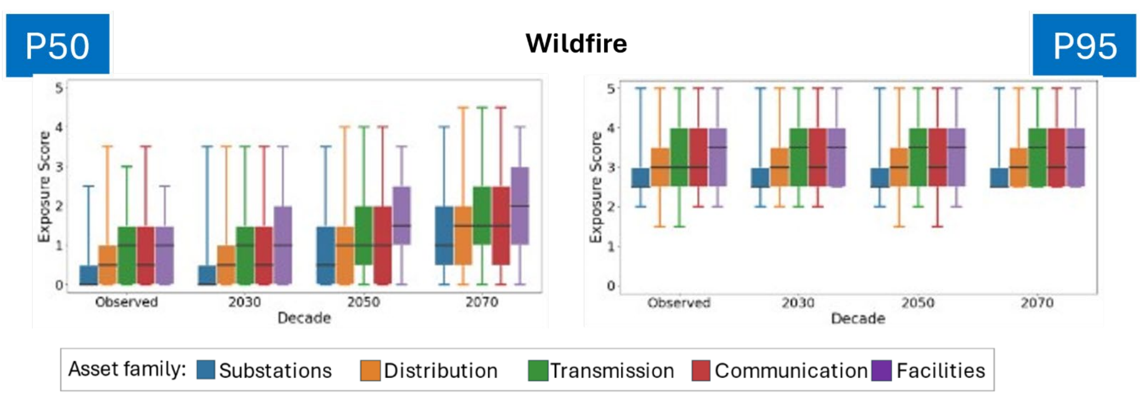
Exposure to inland flooding is projected to increase across SDG&E's service territory in the Coastal, Inland, and Mountain regions throughout the 21st century, with the highest exposure scores in the Mountain and Inland regions. Increases in exposure are projected to be lower-magnitude relative to increases in exposure to temperature and wildfire, with consistent increases across all regions except the Desert region. The Desert region is projected to experience minimal change in exposure to inland flooding. The projected inland flooding exposure scores for each electrical asset family are shown in Figure 3. Using median-year (P50) inland flood exposure scores, the communications and facilities asset families are projected to experience the greatest change in exposure magnitudes, with transmission and substations experiencing the greatest change in extreme-year (P95) exposure magnitudes.

Figure 3: Inland Flooding Exposure Score Distributions for Electrical Asset Families



Conditions that are conducive to large wildfires (sometimes referred to as elevated fire danger days) – which are closely related to temperature and precipitation, as well as humidity – are expected to worsen over the years, with a greater rate of change to be more likely during the latter half of the 21st century. Exposure to wildfire is projected to increase across the service territory through the 21st century, particularly in the Mountain and Inland regions where exposure scores are projected to be highest. The wildfire exposure scores for each electrical asset family are shown in Figure 4. Using the annual number of days above the historical 95th percentile Canadian Forest Fire Weather Index (FWI) and historical wildfire probability, the CAVA analysis aims to identify assets in SDG&E's service territory that are most exposed to wildfire. The analysis is intended to evaluate how the exposure of individual assets and asset classes to wildfire will change over time, examining median changes as well as extreme changes in exposure magnitude. Using median-year (P50) wildfire exposure scores, the communications asset class and the facilities asset class are projected to experience the greatest change in exposure magnitudes, with the transmission asset class and facilities asset class experiencing the greatest change in extreme-year (P95) exposure magnitudes.

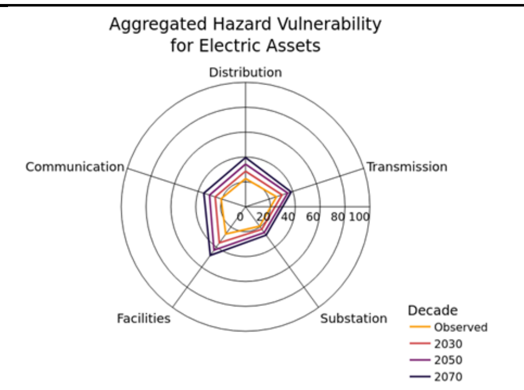
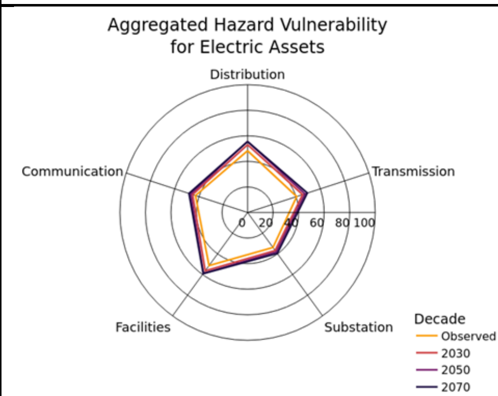
Figure 4: Wildfire Exposure Score Distributions for Electrical Asset Families



Beyond extreme heat, inland flooding, and wildfire impacts, the sea level is expected to rise gradually over the upcoming decades, with faster rates projected in the latter half of the 21st century, which could lead to potential flooding in isolated coastal locations around Mission Bay, San Diego Bay, and San Luis Rey River estuary. Changes to landslide exposure of gas assets is not projected to be significant, with modest impact to isolated areas expected.

An all-hazards view, shown through the radar plots in Table 1, illustrates how overall vulnerability across climate hazards shifts over time, highlighting the changes in both the median (P50) and extreme case (P95) for each major asset class through the end of the century. These values are calculated using the median of available climate models using the SSP3-7.0 scenario. To assess the vulnerability of the entirety of SDG&E's asset portfolio across all climate hazards, an aggregated vulnerability score was calculated for each asset class (or family) and asset type (or component). To calculate these aggregated scores, the 95th percentile vulnerability score for each asset-hazard combination was selected and summed, resulting in one vulnerability score for each asset type to all hazards. This score was normalized to a scale of 100.

Table 1: 95th Percentile of Aggregate Vulnerability for Electrical and Gas Assets

<table>
<tr><th></th><th>Median (P50)</th><th>Extreme (P95)</th></tr>
<tr><td>Electrical</td><td>
</td><td>
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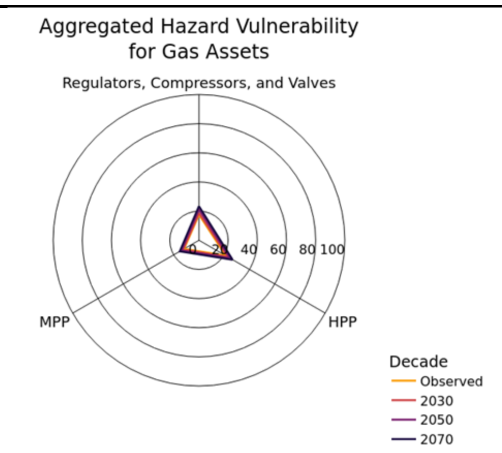
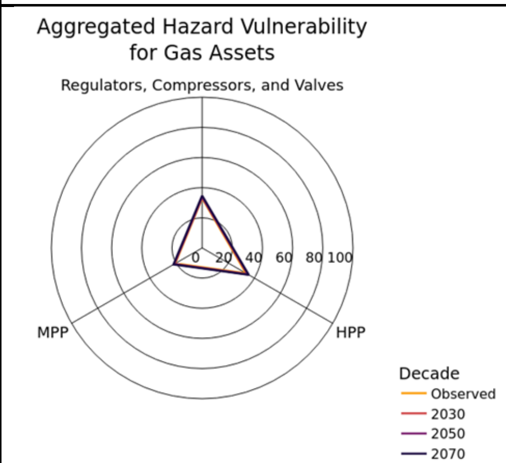
<tr><td>Gas</td><td>
</td><td>
</td></tr>
</table>

These aggregated scores for each asset type and hazard were plotted together in spider charts in Table 1 with separate lines for each time horizon, visualizing the rise in vulnerability over all time frames for all hazards and asset types. For electrical assets, facilities exhibit the highest aggregated vulnerability, followed by distribution and transmission assets. The plots in Table 1 illustrate the vulnerability based on the median (50th percentile) and extreme (95th percentile) climate exposure values. Using median values, the increase in aggregate vulnerability happens in relatively even intervals throughout all timeframes. Using the extreme values, high vulnerability for assets is reached in the observed baseline (1995-2014) period and persists through 2070. This highlights the importance of preparing for extreme climate events, as they are likely to have a disproportionately large impact on the most vulnerable assets in the near-term.

For gas assets, high pressure pipes have the highest observed baseline (1995-2014) aggregated vulnerability and are projected to have the most significant rise in vulnerability, followed closely by regulator, compressor, and valve assets. Under P50, the vulnerability scores are very close throughout time horizons. Under P95, there is an increase in aggregated vulnerability in all asset classes by 2030, before remaining relatively stable through 2050 and 2070.

While the CAVA is designed to inform medium- to long-term planning, the focus in RAMP is on identifying asset classes with high vulnerability in the near-term (*i.e.*, within the Test Year 2028 General Rate Case (GRC) cycle). Vulnerability, however, does not equate to risk. Some of the assets identified as vulnerable in CAVA may not appear in risk chapters due to RAMP asset prioritization criteria set forth in the RDF, but their identification remains critical to informing adaptation planning. For a detailed methodology of the framework used to determine risks included in RAMP through the cost-benefit approach, please refer to Chapter RAMP-3: ERM Risk Quantification Framework. To explore further information on asset types more prone to specific climate hazards and examine how their vulnerability evolves through 2030, 2050, and 2070, please refer to Section 4 of the CAVA, titled "Vulnerability Analysis." As described below, SDG&E is actively exploring ways to incorporate climate exposure data and vulnerability analysis into future RAMP reporting.

IV. CLIMATE CHANGE ADAPTATION IN THE RISK-BASED DECISION-MAKING FRAMEWORK

Effective climate adaptation requires the identification and evaluation of actions that can be taken to address vulnerabilities associated with climate change impacts. SDG&E will continue to explore ways to integrate climate exposure data and vulnerability analysis into its quantitative risk models. Translating climate vulnerability into risk presents several challenges, as the translation of one concept into the other involves nonlinear relationships, interdependencies, and uncertainties. Climate hazards do not necessarily impact every risk directly, and additional analyses are required to understand the specific pathways and interactions involved. Addressing these challenges will require ongoing research and collaboration across the industry to establish best practices for integrating climate data into risk considerations. SDG&E is actively working to refine methodologies and conduct the critical analyses needed to create a robust approach to climate risk that captures the intricate dynamics linking hazards, system responses, and potential outcomes.

The table below summarizes the controls and mitigations listed in individual RAMP chapters that pertain to climate adaptation options listed in CAVA or which increase climate resiliency. This list includes options to harden assets to climate hazards and modify SDG&E's operational practices.

Table 2: Controls and Mitigations that Align with Increasing Resilience to Climate Hazards

Risk Chapter	Relevant ID	Relevant Control/Mitigation	Potential Climate Hazard(s)
Wildfire and PSPS	C501	Wireless Fault Indicators	Wildfires
	C502	Capacitor Maintenance and Replacement Program (SCADA)	Wildfires
	C504	Standby Power Program (Fixed Backup Commercial)	Wildfires
	C506	Microgrids	Wildfires
	C507	CMP Repairs	Wildfires
	C508	Advanced Protection	Wildfires
	C510	Hotline Clamps	Wildfires
	C512	Customized Resiliency Assessments	Wildfires
	C516	Generator Assistance Program	Wildfires
	C518	Strategic Undergrounding	Wildfires
	C520	Distribution Overhead System Hardening	Wildfires
	C522	Transmission Overhead Hardening (Distribution Underbuild)	Wildfires
	C524	Lightning Arrestor Removal/Replacement Program	Wildfires
	C526	Distribution Overhead Detailed Inspections	Wildfires
	C528	Distribution Infrared Inspections	Wildfires
	C530	Distribution Wood Pole Intrusive Inspections	Wildfires
	C534	Risk-Informed Drone Inspections	Wildfires
	C536	Distribution Overhead Pole Inspections	Wildfires
	C550	Combined Covered Conductor	Wildfires
	C552	PSPS Sectionalizing Enhancements	Wildfires
	C559	LiDAR Flights	Wildfires

Risk Chapter	Relevant ID	Relevant Control/Mitigation	Potential Climate Hazard(s)
	C564	Distribution Communications Reliability Improvements (DCRI)	Wildfires
	C565	Transmission Overhead Detailed Inspections	Wildfires
	C568	Strategic Pole Replacement	Wildfires
	C569	Cleveland National Forest Fire Hardening	Wildfires
	C570	Expulsion Fuse Replacements	Wildfires
	C573	Early Fault Detection	Wildfires
	C576	Avian Protection	Wildfires
	C537	Off-Cycle Patrol	Wildfires
	C540	Fuels Management	Wildfires
	C544	Pole Clearing	Wildfires
	C551	Prune and Removal (Clearance)	Wildfires
	C554	Detailed Inspections	Wildfires
	C578	QA/QC of Veg Management	Wildfires
	C562	Weather Station Maintenance and Calibration	Wildfires
	C572	Situational Awareness and Forecasting	Wildfires
	C546	Aviation Firefighting Program	Wildfires
	C548	Wildfire Infrastructure Protection Teams	Wildfires
	C556	Engagement with AFN Populations	Wildfires
	C557	Public Outreach and Education Awareness	Wildfires
	C567	Public Emergency Communication Strategy	Wildfires
	C571	Emergency Preparedness and Recovery Plan	Wildfires
	C566	Enterprise Data Foundation	Wildfires
	C575	Vegetation Management Enterprise System	Wildfires
	C563	Wildfire Mitigation Strategy Development	Wildfires
	C558	Risk Methodology and Assessment	Wildfires
	M503	Grounding Banks	Wildfires
Electric Infrastructure Integrity	C202	Underground Cable Replacement Program - (Proactive)	Wildfires
	C250	Substation Reliability for Distribution Components	Extreme Temperatures, Inland Flooding, and Coastal Flooding
	C253	Restoration of Service	Extreme Temperatures, Wildfires, Inland Flooding, and Coastal Flooding
	C254	Underground Cable Replacement Program – Reactive	Wildfires

Risk Chapter	Relevant ID	Relevant Control/Mitigation	Potential Climate Hazard(s)
	C262	Distribution Substation SCADA Expansion	Wildfires
	C263	Wireless Fault Indicator	Extreme Temperatures
	C269	Distribution Circuit Reliability	Extreme Temperatures
	C270	SCADA Capacitors	Wildfires
	C551	Prune & Removal (Clearance)	Wildfires
	C554	Detailed Inspections	Wildfires
	C578	QA/QC of Veg Management	Wildfires
	M1	Transformer Load Monitoring Driven Transformer Replacement	Extreme Temperatures
Employee Safety	C317	Employee Safety Training & Field Oversight Programs	Extreme Temperatures
	C328	Safety Compliance & Industrial Hygiene Program	Extreme Temperatures, Wildfires
	M303	Enhanced, Risk Informed, Employee Safety Training & Field Safety Oversight Programs	Extreme Temperatures
Contractor Safety	M307	Risk Informed Class 1 Contractor Safety Program Management	Extreme Temperatures
High-Pressure Gas System	C010	Pipeline Monitoring Technologies	Inland Flooding and Landslides
	C013	Gas Transmission Safety Rule – Maximum Allowable Operating Pressure (MAOP) Reconfirmation	Inland Flooding and Landslides
	C104	Cathodic Protection - Capital	Inland Flooding and Landslides
	C113	Leak Repair	Inland Flooding and Landslides
	C125	Pipeline Relocation/Replacement	Inland Flooding and Landslides
	C126	Shallow/Exposed Pipe Remediations	Inland Flooding and Landslides
	C171	Integrity Assessments & Remediation	Inland Flooding and Landslides
Medium-Pressure Gas System	C134	Pipeline Monitoring	Inland Flooding and Landslides
	C139	Gas Distribution Safety Relocations	Inland Flooding and Landslides

SDG&E will continue efforts to align regulatory proceedings, such as RAMP and the GRC, with efforts to address climate risk mitigation activities. SDG&E supports the

Commission's decision in D.24-08-005 to move the timing of the CAVA filing to one year prior to the RAMP report.[10] This change will promote further integration of results and climate adaptation options into mitigation and control programs.

[10] *See* D.24-08-005, Ordering Paragraph 1 at 83.