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VIA EMAIL

Wildfire Safety Division
California Public Utilities Commission
300 Capitol Mall
Sacramento, CA 95814

Re: Comments on Wildfire Safety Division Staff Proposals and Related Workshops

Dear Wildfire Safety Division,

Pursuant to the guidance provided by the Wildfire Safety Division (WSD),¹ San Diego Gas & Electric Company (SDG&E or Company) submits these comments on the WSD's proposals and workshops related to: guidelines and metrics for the 2021 Wildfire Mitigation Plan (WMP) update; system hardening for electric utility resiliency; an annual safety culture assessment process; and 2021 WMP geographic information systems (GIS) data reporting standards.

SDG&E appreciates the WSD's well-reasoned and detailed proposals, and it also appreciates the opportunity to participate in the workshops and offer these comments. In large part, SDG&E agrees with the WSD's various proposals. Set forth below are SDG&E's comments on recommendations or issues that could be further improved, modified or clarified.

Staff Proposal on Wildfire Mitigation Plan Guidance and Metrics

The WSD's proposal on the WMP requirements and metrics table is a step in the right direction. SDG&E appreciates that the WSD has incorporated feedback throughout the WMP process, and that it has streamlined certain requirements where appropriate. Specifically, removing the requirement of the standard data request due to its redundancy with the quarterly reports, the removal of tables with redundant information, and the removal of columns regarding normalization (which led to a lot of confusion in 2020),

¹ Wildfire Safety Division email, "Wildfire Safety Division staff proposals - comments due August 26" (August 12, 2020).

represent substantial improvements. The WSD could further build upon these improvements in several ways, as discussed below.

First, SDG&E remains concerned about the timing of the WMP process, as noted at the workshops. The WSD proposes that it will issue a Draft Resolution containing the proposed updated Guidelines for the 2021 WMPs by October 31, 2020 for approval by the Commission by December 1, 2020. SDG&E appreciates that the WSD shared the first changes or recommendation documents with utilities in August 2020, which allows time to enhance the WMP template in a collaborative way. Compared to the 2020 WMP, the utilities now have an earlier, general knowledge of what the expectations and requirements will be for the 2021 WMP update, and utilities should know even more by October 31 and December 1.

But SDG&E remains concerned with finalization of the WMP requirements by December 1. In order to prepare and submit a WMP that meets the expectations of customers and regulators, SDG&E needs to have a firm, concrete understanding of what those expectations are, as well as time to prepare and draft a comprehensive WMP. Despite the WSD's observations (shared during the workshops) that changes in the 2021 WMP updated guidelines between October and December would be limited, SDG&E's experience has been that the WMP requirements change and evolve quickly, and that material changes will arise during this period. Accordingly, SDG&E respectfully requests that the WSD finalize requirements for approval by the Commission sooner than December 1, and recommends that the WSD change that date to November 1.

Second, the WSD recommends that utilities should identify program owners within the WMP and provide names and contact information. SDG&E submits that this is not the appropriate place to provide the names, email addresses, and phone numbers of the front-line employees who are working to execute the mitigations within the WMP. Even with the confidential and redacted filing options, it puts their privacy at risk. SDG&E understands that the WSD may need to contact project managers to schedule audits or to have access to subject matter experts closest to the work. That said, this can be accomplished by going through the normal single point of contact process. Like other utilities, SDG&E has an established Regulatory Affairs Department, and one of the main purposes of this department is to coordinate communications and information requests between the Commission and its divisions and SDG&E employees and subject matter experts. Not only does the Regulatory Affairs Department have substantial experience in coordinating between the Commission and SDG&E, but it has a better understanding of the WSD's mission than do field employees. The WSD should work with SDG&E's Regulatory Affairs single point of contact to facilitate communication and requests, which would be far more efficient and would avoid the concerns raised above.

Further, to the extent this request for contact information is part of efficiently conducting the plan audits, then this type of document with names and contact information, as well as specific areas and map books of the facilities the WSD would like

to audit can be provided in a separate document specifically for the WSD, and not for the general public.

Third, SDG&E seeks clarification regarding the statement that “information should also be provided on the percentage of electrical workers that have attained status as “Qualified Electrical Worker (QEW).” SDG&E has no issues reporting this as far as electric facilities inspections are concerned, but it is unclear whether or not the WSD also plans to apply this criteria to vegetation management inspections. SDG&E uses the qualification of “Certified Arborist” for these inspections and trimming activities, which is a more appropriate qualification metric for tree trimming. SDG&E thus requests that WSD clarify that the QEW status is not applicable to vegetation management inspections.

Fourth, recommendation 1d states that utilities should report on the number of customers in evacuation zones, and the number of customers notified of evacuation orders. SDG&E has met with its local first responder agencies, the police and fire departments, and they have made it clear that they have ownership of the planning and execution of evacuation orders, including taking responsibility for notifying customers of the need to evacuate in emergency situations. SDG&E has played a support role in evacuation planning and will continue to support its first responder partners. Thus, utility reporting on these metrics exceeds appropriate bounds of utility functions.

Fifth, recommendation 2a proposes a much narrower definition of “near miss” than is appropriate. That proposed definition would only include events that show significant visual evidence of heat including charring, melting, and heavy smoke deposits. As explained during the workshops and supported by other parties, SDG&E believes this type of information – how many faults almost led to a CPUC reportable definition of an ignition – is valuable to collect, and it created a dedicated team as part of its WMP efforts to investigate and document these exact types of events. But SDG&E does not think it is appropriate to narrow the near miss definition to just these events. A near miss should include events that could have led to an ignition. Such events include all faults on the electric system, as well damage found on post Public Safety Power Shutoff (PSPS) event patrols. The goal of many of the utility mitigations is to reduce fault events of the electric system, thereby reducing the opportunities for ignitions. SDG&E is using the reduction in electrical faults as near miss events to measure the effectiveness of its mitigations. One possible solution would be for utilities to use the WSD’s recommendation for the near miss definition while also using “Risk Event” for the other situations described above which we be consistent with the WSD requirements for electrical fault reporting in the quarterly report. In any event, SDG&E is less concerned with the definition, and more concerned that electrical faults should continue to be a driving metric in measuring the effectiveness of applicable mitigations.

Lastly, regarding table 11 a and b, SDG&E recommends that fuse operations be isolated from the rest of equipment failures into its own subcategory. Table 11 is appropriately organized into foreign object in line contacts and equipment failures. The

electrical faults reported in these areas add up to the total electrical faults on the system and can be used to calculate a system level ignition rate. The fuse operations, while important, are not equipment failures and overstate the number of equipment failures on the electrical system. Fuse operations represent an appropriate function of a piece of equipment to isolate a fault on the electric system caused by something else (*e.g.*, foreign object in line or equipment failure). When fuse operations are classified as equipment failures, it inappropriately double counts the number of faults on the electric system. Fuse operations can and have caused fires and are important for documenting the effectiveness of SDG&E's fuse replacement program, which replaces old expulsion fuses with new CAL FIRE-approved fuses. The nuance here is that CAL FIRE approved fuses have no impact on the number of fuse operations; their impact will be measured on the reduction in ignitions caused by fuse operations.

Staff Proposal on Process for Annual Safety Culture Assessment

Generally, SDG&E supports and agrees with the WSD's August 12, 2020 Draft Recommendations for Developing a Safety Culture Assessment Process (Draft Safety Culture Recommendations), which are thorough and well-reasoned. SDG&E also offers certain comments for the WSD's consideration. For instance, SDG&E agrees that the WSD's safety culture assessment process should focus on wildfire safety, given that the Commission already conducts broader Safety Culture Assessments.² That said, SDG&E's own emphasis on safety is not limited to wildfire, nor should it be. Rather, SDG&E's safety culture encompasses all aspects of its operation. Thus, the WSD should not promote Guidelines or other principles – *e.g.*, with respect to corporate governance or executive incentive compensation – that focus exclusively on wildfire safety while minimizing the importance of other safety issues.

With respect to the WSD's "Proposed Approach to Assessing Safety Culture,"³ SDG&E opposes the WSD's proposal to "generalize" requirements the Commission imposed on Pacific Gas and Electric Company (PG&E) in its Chapter 11 Reorganization Plan Decision (D.20-05-053) to other utilities. The Commission's heightened regulation of PG&E's corporate organization, for instance, should serve as the exception (appropriate for instances where a regulated utility has encountered issues of the scope and magnitude PG&E has encountered) and not the general rule. The WSD's suggestion that selection of Safety Committee members would "incorporate consultation with, or approval of, the State and Commission staff" is particularly beyond the scope of what should be required. SDG&E's conduct with respect to wildfire mitigation and prevention (and safety more broadly) should be assessed independently from that of other utilities. Moreover, Assembly Bill (AB) 1054 could have authorized the WSD or the Commission to approve Safety Committee members, but it contains no such authorization. Generally, in California, corporations appoint their own board members.

² Draft Safety Culture Recommendations, p. 6.

³ *Id.*, pp. 7-8.

Lastly, SDG&E requests that WSD carefully consider its proposal to evaluate outcome metrics and culture-specific performance metrics in its Safety Culture Assessment.⁴ SDG&E is not suggesting that such metrics are not important – they are. Rather, SDG&E is concerned that such metrics are already evaluated in several proceedings, as noted by the WSD, and adding them into the Safety Culture Assessment process would mean that there are multiple evaluations, by multiple evaluators, of the same information, which has the potential to lead to conflicting, confusing or inconsistent results or guidance. Given that an approved WMP is a condition to an annual Safety Certification, and that such metrics are within the WMP evaluation process, SDG&E believes that such metrics need not be added to the Safety Culture Assessment.

GIS Data Reporting Standards

SDG&E is concerned that the amount of data requested with respect to GIS reporting standards is significant, and that information is currently located in many different databases across the Company. The effort to pull together such a quarterly report in the requested taxonomy is manual, time and resource intensive, and burdensome. Nevertheless, SDG&E intends to deliver as much of the requested data as possible and to provide it in the format requested. To the extent SDG&E does not have the data, or cannot format the data according to the taxonomy, SDG&E will complete the Excel table that discusses the data gaps and when and if SDG&E will be able to fill them. Due to this request, and similar (but somewhat different) requests from different organizations within the Commission in the context of other proceedings, including the Microgrid rulemaking (R.19-09-009) and the Distributed Resources Proceeding, SDG&E is investigating an investment in a technical data solution that would automate some of this manual consolidation of data from different sources. This data project is expected to be a longer-term solution however, and SDG&E expects to continue to perform this manual data gathering approach for this quarterly report and subsequent quarterly reports in the near future.

System Hardening for Electric Utility Resiliency Threshold

SDG&E viewed with interest the presentation at the August 11 workshop related to system hardening for electric utility resiliency (SHEUR), which proposed a method to further the quantification of wildfire risk. But SDG&E submits that it is (and should remain) the Safety Model Assessment Proceeding (S-MAP) that establishes the risk-based decision-making framework for all risks, including the risk of wildfire, not WMP proceedings. As explained in the joint comments that Southern California Gas Company and SDG&E submitted in the recently initiated CPUC Rulemaking (R.) 20-07-013, “S-MAP is the proceeding ‘to allow the Commission and parties to examine, understand, and comment on the models that the energy utilities plan to use to prioritize risks and to

⁴ *Id.*, p. 11.

mitigate risks.”⁵ The framework and methodologies adopted in the S-MAP are then implemented in other applicable proceedings including each utility’s Risk Assessment Mitigation Phase (RAMP) and WMP filings. This is consistent with statute that requires WMPs to include “[a] methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk that is consistent with the methodology used by other electrical corporations unless the commission determines otherwise”⁶ and specifically references the need to coordinate WMPs with S-MAP and RAMP.⁷ Accordingly, SDG&E submits that this or a similar proposed methodology be further examined in R.20-07-013 and “the appropriate forum for developing wildfire models is the S-MAP, and the result can be applied in Wildfire Safety Division workshops and utility-specific RAMP and GRC filings.”⁸

SDG&E appreciates the opportunity to provide these comments and looks forward to working with the WSD and stakeholders on these issues.

Respectfully submitted,

/s/ Christopher M. Lyons

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⁵ R.20-07-013, Joint Comments of Southern California Gas Company and San Diego Gas & Electric Company to Proposed Decision For Order Instituting Rulemaking To Further Develop A Risk-Based Decision-Making Framework For Electric And Gas Utilities (August 17, 2020) at 4, quoting D.14-12-025 at 21.

⁶ Public Utilities Code Section 8386(c)(15).

⁷ *Id.*, 8386(c)(10) and (c)(11).

⁸ R.20-07-013, Joint Comments at 4.