



Laura M. Fulton
Senior Counsel
8330 Century Park Court, CP32F
San Diego, CA 92123-1548
(858) 654-1759
LFulton@SDGE.com

April 9, 2021

VIA E-MAIL

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

RE: Wildfire Safety Advisory Board Recommendations on 2021 Wildfire Mitigation Plan Guidelines, Performance Metrics, and Safety Culture

Dear Wildfire Safety Advisory Board:

Pursuant to the guidance provided by the Wildfire Safety Advisory Board (WSAB or Board), San Diego Gas & Electric Company (SDG&E) submits these comments on the Board's Recommendations on the 2021 Wildfire Mitigation Plan Updates (WMP or Plan). SDG&E generally supports the Board's recommendations. In these comments, SDG&E offers clarifications and suggested modifications to certain recommendations for the Board's consideration.

A. Risk Assessment, Mapping & Resource Allocation

Board Recommendation: The Wildfire Safety Division (WSD) should establish a peer review process from the scientific community to evaluate the accuracy of the data, assumptions, methods, results, and interpretations for the different models. Alternatively, the WSD could direct the IOUs to establish a peer review process that WSD could monitor as part of its compliance activities. The WSAB is available for collaboration on how this recommendation can be implemented to safely ensure that confidential data remain confidential.

SDG&E Comment: SDG&E supports the integration of peer-reviewed information into utility operations where applicable. In certain respects, SDG&E has already implemented this practice through partnerships with academia and vendors in the scientific community by encouraging and supporting peer-reviewed publications on the advancements that are being implemented. Moving forward, SDG&E intends to continue the practice of partnering with academia and vendors backed by peer-reviewed publications.

B. Vegetation Management: Inspections, Strategies and Pilots

Board Recommendation: The WSD should consider the environmental impacts of the IOUs vegetation management and tree removal practices. The WSD should further consider whether the IOUs consulted with ecologists to plan vegetation management practices to reduce environmental impact.

SDG&E Comment: SDG&E appreciates the WSAB's recognition of SDG&E's tree replacement efforts through the Right Tree Right Place Program, and its work to remove tree debris to reduce environmental impacts. SDG&E intends to continue its focus on sustainability in vegetation management practices and concurs that sustainable vegetation management practices should be encouraged in the Wildfire Mitigation Plans. SDG&E believes that its expanded tree planting efforts increase its sustainability goals, reduce fire risk, and enhance compliance and reliability. Further, SDG&E will continue to engage its Environmental Service Department in advance of Vegetation Management activities as part of its Natural Communities Conservation Plan (NCCP) to assess activities for the protection of species and environmental stewardship. SDG&E also seeks to continue to expand its efforts of diverting a higher volume of green waste debris associated with vegetation management activities from landfills to 100% recycling options, in addition to repurposing materials for alternative, private use.

Board Recommendation: The WSD should evaluate whether the IOUs need to improve their training programs for vegetation management contractors and increase the auditing and monitoring of vegetation contractors.

SDG&E Comment: SDG&E appreciates the Board's emphasis on training for vegetation management contractors but notes that it already requires all contractors to maintain industry required safety standards through the ISNet System. In addition to internal contractor-training, all Vegetation Management contractors are required to perform annual training to cover hazard tree inspections, environmental/cultural stewardship, customer service, and fire prevention/awareness. All tree contractors are required to have a dedicated, local field safety advisor to oversee work operations. SDG&E employs a third-party contractor to perform job safety observations of tree operations. Additionally, SDG&E performs an audit of a minimum of 10% of all work completed by the contractors.

Board Recommendation: The WSD should request that the IOUs WMPs explain how their vegetation management practices use Utility Defensible Space under utility right of ways. The WSD should direct the IOUs to perform a cost-benefit analysis to compare the benefits of low-growing shrubs versus clearance and chemicals.

SDG&E Comment: SDG&E agrees that there may be synergies with integrating Utility Defensible Space (UDS) practices with vegetation management activities within utility rights of ways where there is a commonality of space. SDG&E can work with property owners to identify and remove incompatible or problematic trees that are located where powerlines intersect UDS. Regarding a cost-benefit analysis of low-growing shrubs versus clearance, SDG&E would need to consider multiple factors in the relative value of each. SDG&E already pursues the advantage of replacing incompatible trees that require pruning with lower-growing vegetation. In some situations, replanting with shrubs may not be beneficial or may actually increase the fuel base, which could defeat wildfire mitigation goals.

C. System Design and Management: Grid Hardening, Operations, Inspections, and Emerging Technology

Board Recommendation: The WSD should request the IOUs evaluate the risk involved in keeping idle lines or equipment energized versus disconnecting completely when not in use. The WSD should request that the IOUs to identify any equipment or lines that may still be energized and not in service and require the IOUS to remove or de-energize lines and equipment from service, which would lower the risk of those assets failing and causing a fire. If the IOUs have adopted the practice of deenergizing idle lines, then the WSD should request that they explain this in their WMPs.

SDG&E Comment: SDG&E identifies idle equipment through detailed inspections performed on its equipment in accordance with CPUC General Orders. When equipment is identified as idle, SDG&E begins the process for removal. To ensure the equipment will not be used again in the near future, SDG&E contacts the landowner to check for future service requirements. If no future service is required, the equipment will be removed within 12 months.

Board Recommendation: The WSD should request that the IOUs explain their protocols to ensure the safety of its workforce during the removal, installation, and repair of equipment, especially when introducing new technologies or equipment, and implementing new work practices.

SDG&E Comment: SDG&E has a robust process for evaluating new equipment and developing standards for equipment installation and maintenance. Training and work methods are key to ensuring worker safety, and SDG&E emphasizes this as part of initial training, refresher training, safety meetings, and on-the-job tailgates.

Board Recommendation: The WSD should request the IOUs provide more detail about how they will ensure the workforce will become qualified, their training plans, including start, length of the training, etc.

SDG&E Comment: SDG&E has established and maintained training programs for vegetation management and qualified electrical workers to ensure they are able to identify potential issues and respond appropriately. These field personnel receive specific training related to SDG&E's fire plan annually. These training programs are detailed in section 5.4 and section 7.3.9.1 of the 2021 WMP Update.

Board Recommendation: The WSD should request information from the IOUs about G.O. 95 exempt equipment so that it can track and monitor this equipment. The WSD should evaluate the sufficiency of the IOUs' plans or lack thereof to mitigate the increased risk this equipment poses, especially any equipment located in the high fire threat districts.

SDG&E Comment: While generally SDG&E does not have any equipment exempt from G.O. 95, all equipment within the HFTD is reviewed to understand the risk and appropriate mitigations.

D. Public Safety Power Shutoffs: Reducing the Scale, Scope and Frequency

Board Recommendation: The WSD should consider how the IOUs utilize data collected when investigating near misses during and after a PSPS event and request that the IOUs describe how they use data collected to evaluate their mitigation efforts.

SDG&E Comment: Prior to restoring power after a Public Safety Power Shutoff, SDG&E crews patrol overhead lines for damages. This information – including structure ID, description of damage, and photos – are recorded in the PSPS Post-Event Report. Building upon this documentation, SDG&E will continue to be thoughtful in its assessment methodologies and will strive to provide more granularity and greater transparency into its mitigation proposals.

Board Recommendation: The WSD should request that the IOUs conduct independent short and long-term studies that evaluate mitigation practices, including Enhanced Vegetation Management and grid hardening, to assess their effectiveness in mitigating wildfires. The studies should focus on areas where mitigation efforts have taken place and evaluate the data collected during patrols after a PSPS event.

SDG&E Comment: SDG&E appreciates WSAB's acknowledgement of its "well-organized and adaptable" WiNGS program and risk modeling as it relates to PSPS consequences. SDG&E is amenable to the Board's suggestion for the IOUs to conduct short- and long-term studies to evaluate efficacy of mitigation activities. However, understanding the importance of transparency and continual improvement, SDG&E urges WSD and WSAB to be cognizant of introducing new reporting and evaluation processes—beyond those already in place—that can be overly burdensome and taxing on resources.

Additionally, SDG&E contends it has already begun some in-house analysis similar to WSAB's recommendation. In section 4.4.2 of its 2021 WMP Update, SDG&E included the results of nine research studies conducted to better understand best practices for mitigating faults on its system. One study in particular (discussed in Section 4.4.2.3) specifically focused on the effectiveness of overhead distribution hardening at reducing the occurrence of overhead faults. SDG&E plans to

conduct further analysis and expand the scope of its studies to better understand optimal mitigations to limit faults and subsequent ignitions.

E. Emergency Planning and Communication: Emergency Preparedness, Stakeholder Cooperation, and Community Engagement

Board Recommendation: The WSD should request as part of its review that the IOUs explain what metrics were used in the 2021 WMP Updates to evaluate the effectiveness of their stakeholder engagement efforts and inform what changes were made between 2020 and 2021.

SDG&E Response: In 2020 key stakeholders were asked to provide feedback via an online survey on their level of engagement immediately following every PSPS event. In 2021, SDG&E will continue the practice of the post-event engagement survey. SDG&E has also added post-season meetings to solicit feedback in a discussion-based setting to ensure an increased level of participation and to follow-up on any questions or comments that were included in the online survey.

SDG&E appreciates the opportunity to provide these comments on the Board's recommendations and looks forward to working with the Commission and interested stakeholders on these issues.

Respectfully submitted,

/s/ Laura M. Fulton
Attorney for
San Diego Gas and Electric Company

cc: R.18-10-007 Service List