

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



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Order Instituting Rulemaking to Implement  
Electric Utility Wildfire Mitigation Plans  
Pursuant to Senate Bill 901 (2018)

R.18-10-007  
(Issued October 25, 2018)

**RESPONSE OF SAN DIEGO GAS AND ELECTRIC COMPANY (U 902-E)  
TO ADMINISTRATIVE LAW JUDGE'S RULING SEEKING ADDITIONAL  
INFORMATION ON WILDFIRE MITIGATION PLANS**

Keith W. Melville  
8330 Century Park Court, CP32D  
San Diego, CA 92123  
(858) 654-1642 (telephone)  
(619) 699-5027 (facsimile)  
[kmelville@semprautilities.com](mailto:kmelville@semprautilities.com)

Attorney for  
SAN DIEGO GAS & ELECTRIC COMPANY

February 26, 2019

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OF THE STATE OF CALIFORNIA**

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**I. INTRODUCTION**

Pursuant to the February 21, 2019 Ruling of Administrative Law Judge Thomas seeking additional information on Wildfire Mitigation Plans, San Diego Gas & Electric Company (SDG&E) timely submits this response, which provides the additional information required for SDG&E.<sup>1</sup>

**II. ADDITIONAL INFORMATION ON WILDFIRE MITIGATION PLAN**

**A. Categorize the Objectives consistent with § 8386(a) into the following timeframes: Before upcoming wildfire season, Before next Plan filing, and Within next 5 years.**

SDG&E’s Wildfire Mitigation Plan includes a purpose statement (at 2), which states:

The purpose of this Plan is to provide, in accordance with state law, a plan for wildfire mitigation that will be reviewed and approved by the California Public Utilities Commission (CPUC or Commission) after consultation and review by state fire experts at the California Department of Forestry and Fire Protection (CalFire). Once approved, SDG&E will utilize this Plan as a framework to reasonably manage wildfire risk until the CPUC approves a subsequent Plan (on an approximately annual basis). SDG&E anticipates that this initial Plan cycle will last 18 months, with subsequent Plans on a calendar year period. SDG&E’s Plan and its

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<sup>1</sup> The Ruling (at 2) assigns items 4 through 6 to “Southern California Gas and Electric (SDG&E).” Despite the error in the company name, upon reviewing these items, SDG&E believes that these are items assigned to SDG&E.

implementation need to be flexible to adapt to changing circumstances, weather, funding, and other variables that cannot be known in advance.

As noted in this purpose statement, SDG&E anticipated that (due in part to its mid-year starting point), its initial Wildfire Mitigation Plan might be in place for 18 months. Accordingly, SDG&E provided both 2019 and 2020 program information in its Wildfire Mitigation Plan. Because this question (and the next one) utilize timeframes which are on a non-calendar year, they do not align with some of the discussion in SDG&E's Wildfire Mitigation Plan. For example, although SDG&E's Plan discusses objectives and activities through 2020, the question's timeframe addresses the filing date for SDG&E's next Plan, which for purposes of this response is assumed to be in early February 2020.

SDG&E's Wildfire Mitigation Plan listed the Plan Objectives (at 5):

### **Plan Objectives**

Consistent with state law and objectives, this Plan is founded upon the goal of minimizing the probability that the various components of SDG&E's electric system might become the original or contributing source of ignition for a wildfire. Wildfire safety, prevention, mitigation, and recovery are a central priority for SDG&E. The programs, initiatives, and plans described in this Plan highlight many of the efforts SDG&E has made and will continue to make to mitigate wildfire risk. Building upon its existing Fire Prevention Plan (FPP), SDG&E further examined various improvements and further enhancements that could be made to its Community Fire Safety Program to meet its and the state's wildfire mitigation objectives. While many of SDG&E's strategies and programs are already in place, this Plan is continually evolving and in an effort for continuous improvement, SDG&E expects that additional programs and enhancements will be implemented and refined.

The threat of wildfire has increased throughout California and the region over the past several years, which as discussed in greater detail herein, may be attributed to a variety of factors such as drought, climate change, bark beetle infestations, and development and population growth in fire-prone areas. Over the past ten years, SDG&E has taken significant steps to address wildfire risks and continues to evaluate opportunities to mitigate the risk. To that end, SDG&E has proposed several wildfire risk mitigation programs and activities in its Test Year (TY) 2019 GRC application, which is still awaiting Commission action. Given that devastating wildfires have become a regular occurrence in California, SDG&E needs to begin implementing and accelerating programs that address wildfire risk.

SDG&E addresses the categorization of these objectives as follows:

### **1. Before Upcoming Wildfire Season**

There will be a very short window of time between the date the CPUC approves this Wildfire Mitigation Plan, and the upcoming wildfire season. With that caveat, SDG&E believes that the objectives of its Plan are: 1) already in place, 2) ongoing, and 3) not necessarily determined by a CPUC approval date. Our primary objective is minimizing the probability that the various components of SDG&E's electric system might become the original or contributing source of ignition for a wildfire.

### **2. Before Next Plan Filing**

As noted above, SDG&E has identified activities (to support the Plan's objective) through 2020, in contrast to the timeframe of this question which asks about the next Plan filing date (very early in 2020). With that caveat, in support of SDG&E's Wildfire Mitigation Plan objectives, are several programs which SDG&E proposes should be accelerated or initiated, as identified in the Plan itself and summarized in the table "SDG&E Wildfire Mitigation Plan Strategies and Program Timeframes" (provided in response to item 2, below). Our objective before the next Plan filing is that these programs would be undertaken or accelerated by the date of the new Plan's filing.

### **3. Within Next 5 Years**

SDG&E's objectives are ongoing and although they may be adjusted over time based on experience, feedback, and legal requirements, we do not expect our primary objective to change within a five-year time frame.

#### **B. Categorize the Description of preventive strategies and programs into the following timeframes: Before upcoming wildfire season, Before next Plan filing, and Within next 5 years.**

SDG&E's Wildfire Mitigation Plan provided the categorization of its wildfire preventative strategies and programs in the workpapers attached as Appendix A to the Plan. SDG&E summarizes those categorizations in the table below. It is important to note, as explained above, that SDG&E anticipates its initial Wildfire Mitigation Plan may be in place for 18 months (compliance period of Plan), which is why it provided both 2019 and 2020 strategy and program information. The wildfire preventative strategies and programs set forth in SDG&E's initial plan are either already in place or SDG&E proposes should be accelerated or

initiated. Generally, SDG&E believes its Plan strategies and programs would be continued, undertaken, or accelerated by the next Plan filing.

### **SDG&E Wildfire Mitigation Plan Strategies and Program Timeframes**

<b>Plan Section</b>	<b>Title</b>	<b>Timeframe</b>
4.1.1	Response to Change in Operating Conditions	Ongoing strategy that will continue over the compliance period of Plan
4.1.2	Recloser Protocols	Ongoing strategy that will continue over the compliance period of Plan
4.1.3	Other Special Work Procedures	Ongoing strategy that will continue over the compliance period of Plan
4.1.4.1	Wildfire Infrastructure Protection Teams (Contract Fire Resources)	Ongoing program that will continue over the compliance period of Plan
4.1.4.2	Aviation Firefighting Program	Program that will continue over the compliance period of Plan
4.1.4.3	Industrial Fire Brigade	Program that will continue over the compliance period of Plan
4.1.4.5	Ignition Management Program	Program that will continue over the compliance period of Plan
4.1.4.6	Fuel Management Program	Program that will continue over the compliance period of Plan
4.2.1	Distribution System Inspection	Ongoing program that will continue over the compliance period of Plan
4.2.2	Substation System Inspection	Ongoing program that will continue over the compliance period of Plan
4.2.3	Transmission System Inspection	Ongoing program that will continue over the compliance period of Plan
4.2.4	Geographic Information Systems Data	Program that will continue over the compliance period of Plan
4.3.1	Design and Construction Standards	Ongoing strategy that will continue over the compliance period of Plan
4.3.2	Testing and Deploying Emerging Technologies	Ongoing strategy that will continue over the compliance period of Plan
4.3.3	Facility Analysis	Ongoing program that will continue over the compliance period of Plan
4.3.4	Oversight of Activities in the Rural Areas	Ongoing strategy that will continue over the compliance period of Plan
4.3.5	Asset Management	New program that will continue over the compliance period of Plan

<b>Plan Section</b>	<b>Title</b>	<b>Timeframe</b>
4.3.6	Overhead Transmission and Distribution Fire Hardening	Ongoing program that will continue over the compliance period of Plan; At the current rate, SDG&E plans to complete the wood to steel program by 2025
4.3.7	Underground Circuit Line Segments	New program that will continue over the compliance period of Plan; SDG&E plan to continue the 20D program as well as strategic undergrounding on an ongoing annual basis
4.3.8	Cleveland National Forest Fire Hardening	Ongoing program that will continue over the compliance period of Plan; Program is planned to be completed by 2021
4.3.9	Fire Risk Mitigation Program (FiRM)	Existing program that will continue over the compliance period of Plan; SDG&E plans to accelerate the amount of circuit mileage hardened per year to complete the program in seven years (2019-2025) from the originally planned 12 years
4.3.10	Pole Risk Mitigation and Engineering Program (PRiME)	New program that will continue over the compliance period of Plan
4.3.11	Expulsion Fuse Replacement Program	New program that will continue over the compliance period of Plan; Program is planned to be completed in three years (2021)
4.3.12	Hotline Clamps	New program that will continue over the compliance period of Plan; Program is planned to be completed in six years (2024)
4.3.13	Wire Safety Enhancement Program (WiSE)	New program that will continue over the compliance period of Plan; SDG&E plans to continue this program into 2021 and will continue to monitor weather and wind conditions in areas outside the HFTD for wildfire risk mitigation in future years
4.3.14	Covered Conductor	New program that will continue over the compliance period of Plan
4.3.15	Fire Threat Zone Advanced Protection	New program that will continue over the compliance period of Plan

<b>Plan Section</b>	<b>Title</b>	<b>Timeframe</b>
4.3.16	LTE Communication Network	New program that will continue over the compliance period of Plan; Program is planned to finish deployment in the HFTD by 2021
4.3.17	Automated Reclosers	Completed program that will remain in effect over the compliance period of Plan
4.3.18	Public Safety Power Shutoff Engineering Enhancements	New program that will continue over the compliance period of Plan
4.3.19	Pole Replacement and Reinforcement	Ongoing strategy that will continue over the compliance period of Plan
4.3.20	Backup Power for Resilience	New program that will continue over the compliance period of Plan
4.4.1	Tree Database	Program will continue over the compliance period of Plan
4.4.2	Patrol and Pruning	Program will continue over the compliance period of Plan
4.4.3	Enhanced Inspections, Patrols, and Trimming	Program will continue over the compliance period of Plan
4.4.4	Technology (Vegetation Management)	Program will continue over the compliance period of Plan
4.4.5	Quality Assurance	Program will continue over the compliance period of Plan
4.4.6	Hazard Tree Removal and Right Tree-Right Place	Program will continue over the compliance period of Plan
4.4.7	Pole Brushing	Ongoing program that will continue over the compliance period of Plan
4.4.8	Electric Equipment Training	Program will continue over the compliance period of Plan
4.4.9	Red Flag Operations (Vegetation Management)	Program will continue over the compliance period of Plan; Program has high variability as the utilization will depend on the number of red flag events, and the amount of circuits forecasted to be impacted by red flag events
4.5.1	Fire Science and Climate Adaption Department	Strategy that will continue over the compliance period of Plan
4.5.2	Meteorological Capabilities and Technologies	Ongoing strategy that will continue over the compliance period of Plan
4.5.3	Fire Potential Index	Ongoing strategy that will continue over the compliance period of Plan
4.5.4	Santa Ana Wildfire Threat Index	Ongoing strategy that will continue over the compliance period of Plan

<b>Plan Section</b>	<b>Title</b>	<b>Timeframe</b>
4.5.5	Wildfire Risk Reduction Model – Operational System	Ongoing program that will continue over the compliance period of Plan
4.5.6	Camera Networks and Fire Detection	Ongoing strategy that will continue over the compliance period of Plan
4.6	Climate Adaptation	Ongoing strategy that will continue over the compliance period of Plan
4.6.2	Wireless Fault Indicators	Program will continue over the compliance period of Plan; Program planned for completion in 2021
4.6.3	Advanced Weather Station Integration and Forecast	Program will continue over the compliance period of Plan
4.7.1	Strategy for Minimizing Public Safety Risk During High Wildfire Conditions	Ongoing strategy that will continue over the compliance period of Plan
4.7.2	Public Safety Power Shutoff Protocols	Ongoing strategy that will continue over the compliance period of Plan
4.7.4	Communication Practices (Public Safety Power Shutoff)	Ongoing program that will continue over the compliance period of Plan
4.7.5	Mitigating the Public Safety Impact of PSPS Protocols	Ongoing strategy that will continue over the compliance period of Plan
4.1.4.2 4.1.4.3 5.1	Emergency Management Operations	Ongoing program that will continue over the compliance period of Plan
5.2	Disaster and Emergency Preparedness Plan	Ongoing program that will continue over the compliance period of Plan
5.3	Customer Support in Emergencies	Ongoing program that will continue over the compliance period of Plan
6.4.1	Monitoring and Correcting Deficiencies	Strategy will continue over the compliance period of Plan

**C. Regarding the Performance Metrics and Monitoring, indicate the processes and procedures for monitoring and auditing the effectiveness of equipment and line inspections.**

SDG&E’s Wildfire Mitigation Plan contains information in Section 4.2.1.3 – Monitoring and Auditing regarding the processes and procedures for monitoring and auditing the effectiveness of equipment and line inspections. Please see the section excerpt below:

**4.2.1.3 Monitoring and Auditing**

SDG&E utilizes various reports to monitor its CMP [Corrective Maintenance Program] progress, for both inspections and repairs. In



addition, regular monthly meetings are held with various internal construction and operations centers to discuss detailed CMP progress.

Upon completion of prescribed actions necessitated by the CMP and the QA/QC [Quality Assurance/Quality Control] inspections, SDG&E conducts an audit to ascertain the effectiveness of the inspections. This audit is run by SDG&E's operational and engineering managers, who are responsible for certain districts. They typically select about 1.5% of the combined (overhead and underground) territories and assess their conditions to see if the appropriate improvements have been properly carried out.

### III. CONCLUSION

SDG&E timely submits the additional information on its Wildfire Mitigation Plan as required by the Ruling.

Respectfully submitted,

/s/ Keith W. Melville

Keith W. Melville

Attorney for  
San Diego Gas & Electric Company  
8330 Century Park Court, CP-32D  
San Diego, CA 92123-1530  
Telephone: (858) 654-1642  
E mail: [KMelville@semprautilities.com](mailto:KMelville@semprautilities.com)

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