



San Diego Gas & Electric 2023 Change Order Report

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OEIS Docket No. 2023-2025-WMPs

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Change Order

The Office of Energy Infrastructure Safety (OEIS or Energy Safety) issued a final decision approving SDG&E's 2023-2025 Base WMP on October 13, 2023. Energy Safety's 2023-2025 WMP Process Guidelines require utilities to submit a change order report if an electrical corporation seeks to change an initiative's risk by an increase or decrease of 25% in specific initiative categories delineated by the guidelines.¹ SDG&E submitted its original change order request on November 1, 2023. Energy Safety subsequently requested that SDG&E resubmit its Change Order Request to better reflect Energy Safety's intended purpose of the change order process.² SDG&E is hereby providing its Revised Change Order Request consistent with Energy Safety's direction.

The guidelines also allow utilities to update quarterly initiative targets for 2024 initiatives to assist in adjusting to the year-ahead approach. At a high level, the objective of the change order process is to ensure the electrical corporations continue to follow the most effective and efficient approach to mitigating its wildfire risk and acknowledged that the approach described in the WMPs could change as electrical corporations gain experience and measures its mitigations' outcomes.

Pursuant to Energy Safety's guidance, SDG&E is updating its 2024 targets across two categories. Section 2 requests approval of updated 2024 targets for eight initiatives that SDG&E considers significant changes per Energy Safety guidelines, and the approval of one new target associated with an Area of Continued Improvement (ACI) issued by Energy Safety in the approval of the base 2023-2025 WMP. Section 3 provides updated information on thirteen initiatives based upon updated information regarding resource and work forecasts that are expected to alter SDG&E's original initiative targets. These updates have been removed from SDG&E's original Change Order Request, and SDG&E provides this information for additional context. SDG&E is not seeking approval to change these targets as they do not meet Energy Safety's criteria required for significant changes.

¹ *Office of Energy Infrastructure Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines* (December 6, 2022) at Pgs. 22-28, OEIS Docket No 2023-2025-WMPs.

² *Energy Safety Response to SDG&E's Request to Resubmit its Change Order Request* (December 14, 2023), OEIS Docket No 2023-2025-WMPs.

1. Changes for 2023 Initiatives

SDG&E requests no changes for 2023 mitigation initiatives.

2. Changes for 2024 Initiatives

SDG&E requests to update 8 of 41 initiative targets for 2024 per Energy Safety's 2023-2025 WMP Process Guidelines.³ In addition, SDG&E seeks to reestablish one initiative in 2024 for Weather Station Maintenance and Calibration (WMP.447, formerly *Advanced Weather Monitoring and Weather Stations*) in response to ACI SDGE-23-19. SDG&E submits an amended Table 12 (Attachment A) as a comprehensive view of its requested target updates (updated targets are designated in red).

2024 Target Update Requested	2024 Original Target	2024 Updated Target
Distribution OH Hardening – Covered Conductor	60 miles	40 miles
Strategic Pole Replacement Program	200 poles	267 poles
Distribution Infrared Inspections	9,500 inspections	300 inspections
Wireless Fault Indicators (WFIs)	300 WFIs	0 WFIs
Distribution Communications Reliability Improvements	60 base stations	15 base stations
Air Quality Index	18 sensors	0 sensors
Standby Power Program (Fixed Backup Power)	300 generators	58 generators
Microgrids	3 microgrids	1 microgrid
Weather Station Maintenance and Calibration	N/A	222 weather stations

[Covered Conductor \(WMP.455\); pg 152, SDG&E 2023-2025 Wildfire Mitigation Plan](#)

The proposed target change for Covered Conductor in 2024 is a reduction from 60 miles to 40 miles due to a change in timing. The target reduction is due to design and engineering delays for approximately 20 miles of work due to various factors. The design delays and subsequent activities in the project schedule forecast, including land rights, permitting, and environmental constraints pushed the forecasted issuance of jobs to construction into fourth quarter 2024. Ultimately, SDG&E is still forecasting to complete its three-year objectives by increasing the target miles in 2025. SDG&E does not anticipate this change will impact expected wildfire risk reduction within the current WMP cycle.

SDG&E does not propose any changes to forecasted expenditures at this time. Forecasted capital expenditures remain at a total of \$107,463,000 and forecasted O&M expenditures remain at a total of \$1,184,000 for the 2024-2025 WMP cycle years.

[Strategic Pole Replacement \(WMP.1189\); pg 174, SDG&E 2023-2025 Wildfire Mitigation Plan](#)

The proposed changes to Strategic Pole Replacement in 2024 are due to a change in approach resulting in a target increase from 200 to 267. SDG&E has found approximately 250 poles in the HFTD that require pole loading remediation through various other projects outside of its Corrective Maintenance

³ *Office of Energy Infrastructure Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines* (December 6, 2022) at Pgs. 22-28, OEIS Docket No 2023-2025-WMPs.

Program (CMP) and grid hardening initiatives. As a result, SDG&E plans to increase the scope of Strategic Pole Replacement program by at least 50 poles per year for the next 5 years (2024 – 2028). Additionally, 17 poles scheduled to be completed in 2023 are postponed to 2024 due to delayed design and limited construction resources. SDG&E anticipates an increase in wildfire risk reduction corresponding to the scope increase.

SDG&E does not propose any changes to forecasted expenditures at this time. Forecasted capital expenditures remain at a total of \$13,402,000 and forecasted O&M expenditures remain at a total of \$998,000 for the 2024-2025 WMP cycle years.

[Distribution Infrared Inspections \(WMP.481\); pg 189, SDG&E 2023-2025 Wildfire Mitigation Plan](#)

SDG&E proposes a change in target and approach for Distribution Infrared Inspections for 2024. The target change is a reduction from approximately 9,500 structures to 300 structures as the program transitions to a risk-informed strategy in 2024. In prior years, structures selected for this program were based on previously inspected structures to ensure no repeat inspections were performed in consecutive years and on subject matter experts' (SME) recommendations. SDG&E has found that this inspection program yielded only a 0.2% findings rate to date in 2023. To optimize this program and make it more effective in 2024, the program will target specific areas in the WUI during peak load season and structures will be selected using a risk-informed strategy comprised of SDG&E's Asset 360 models, risk analytics models, and Intelligent Image Processing (IIP). For more information on the models and technology utilized, please refer to SDG&E's 2023 – 2025 WMP. SDG&E does not anticipate these changes will impact expected wildfire risk reduction within the current WMP cycle.

SDG&E does not propose any changes to forecasted expenditures at this time. Forecasted capital expenditures remain at \$0 and forecasted O&M expenditures remain at a total of \$350,000 for the 2024-2025 WMP cycle years.

[Wireless Fault Indicators \(WMP.449\); pg 304, SDG&E 2023-2025 Wildfire Mitigation Plan](#)

SDG&E proposes to reduce its target for Wireless Fault Indicators for 2024 from 300 to zero installations due to a change in approach based on a technology update. SDG&E is pausing this program due to manufacturer upgrades to the currently used fault indicators. The upgraded equipment requires additional communication requirements not currently employed, thus requiring SDG&E to evaluate and assess the feasibility of implementing the equipment. In addition, SDG&E will also evaluate other types of fault indicators from various manufacturers to determine best approach. In the interim, SDG&E will utilize SCADA devices and existing fault indicators to provide situational awareness and guide first responders to the likely location of a fault. SDG&E does not anticipate this change will impact expected wildfire risk reduction within the current WMP cycle.

SDG&E forecasts all capital and O&M expenditures to be reduced to \$0 for the 2024-2025 WMP cycle years.

[Distribution Communications Reliability Improvements \(WMP.549\); pg 171, SDG&E 2023-2025 Wildfire Mitigation Plan](#)

SDG&E proposes to reduce the target for this program from 60 to 15 base stations, due to a change in timing. Most sites planned for base station installation have engineered steel foundation poles that will

have the telecommunication antennas at the top of the pole and electric (12kV and below) attachments in the middle of the pole. The poles are currently undergoing standardization, and it has taken more time than expected to develop the specifications for the poles including workspace, operational, and manufacturing requirements. To complete the pole standardization, three pilot sites were selected and pole orders are expected to be placed by the end of 2023. With construction of these three sites, SDG&E anticipates completing the standardization of these unique pole designs to accelerate the program in 2025 and beyond. In addition, SDG&E is making process improvements with substation and transmission facility engineering and operations groups, to ensure proper site selection and working through design and construction process.

The modifications in our workplan will delay the communications reliability improvements expected from the SDG&E-owned private LTE network backbone that supports some of SDG&E's Advanced Protection Programs (APP), including Falling Conductor Protection (FCP) and Early Fault Detection (EFD). FCP and EFD work can continue to be deployed in the interim and will be enhanced once the LTE backbone is completed. SDG&E does not anticipate this change will impact expected wildfire risk reduction within the current WMP cycle.

SDG&E does not propose any changes to forecasted expenditures at this time. Forecasted capital expenditures remain at a total of \$127,364,000 and forecasted O&M expenditures remain at a total of \$1,758,000 for the 2024-2025 WMP cycle years.

[Air Quality Index \(WMP.970\); pg 301, SDG&E 2023-2025 Wildfire Mitigation Plan](#)

The Air Quality Index Program has installed 15 particulate sensors between 2022 and 2023, with a final particulate sensor to be installed by the end of 2023. SDG&E proposes to change its 2024 target for this program to zero due to decrease in program scale. SDG&E procured 18 total sensors, one of which is used as a master unit used for calibration and on that serves as an additional spare. The HFTD will be 100% covered by the 16 installed sensors and further installations would not provide additional benefit. The Air Quality Program will continue to monitor and maintain the sensors, and it retains the ability to assess for future upgrades as necessary. SDG&E does not anticipate this change will impact expected wildfire risk reduction within the current WMP cycle.

SDG&E forecasts all capital and O&M expenditures to be reduced to \$0 for the 2024-2025 WMP cycle years.

[Standby Power Program \(Fixed Backup Power\) \(WMP.468\); pg 176, SDG&E 2023-2025 Wildfire Mitigation Plan](#)

SDG&E proposes a change in approach to Fixed Backup Power in 2024, reducing the target from 300 to 58. This program continued its success in 2023 and is on track to install over 300 permanent generators for customers that were not otherwise scheduled for mitigation efforts. SDG&E has installed a total of just under 1,200 residences and 16 commercial sites over the life of the program. In 2024, SDG&E will explore and evaluate additional mitigation approaches for its customers and will scale back on providing traditional fossil fuel generators to make room for more diverse offerings. Due to the success of the program historically, as well as the success of other programs within the WMP, SDG&E will use the 2024 year to complete outstanding projects pending from prior years and focus on evaluating alternative offerings. The revised 2024 target represents a period of completion to areas that have been previously invited to participate in the program, as well as a period of evaluation to determine how individual

mitigation offerings fit into the program and larger vision of the WMP. SDG&E does not anticipate this change will impact expected PSPS risk reduction within the current WMP cycle.

SDG&E does not propose any changes to forecasted expenditures at this time. Forecasted capital expenditures remain at \$0 and forecasted O&M expenditures remain at a total of \$21,180,000 for the 2024-2025 WMP cycle years.

[Microgrids \(WMP.462\); pg 162, SDG&E 2023-2025 Wildfire Mitigation Plan](#)

SDG&E proposes a target change to the Microgrid program in 2024 from 3 to 1 due to delays in acquiring appropriate and sufficient land rights, on-going supply chain issues resulting in an increase to material costs (i.e., battery, solar photovoltaic panels), and increased labor costs. SDG&E now anticipates completing the Shelter Valley and Butterfield microgrids in 2025. Both microgrids are commissioned and capable of serving customers using fossil fuels, therefore meeting the risk reduction intent, but SDG&E does not consider the projects complete until renewable configuration is in place.

SDG&E does not propose any changes to forecasted expenditures at this time. Forecasted capital expenditures remain at a total of \$23,440,000 and forecasted O&M expenditures remain at a total of \$3,576,000 for the 2024-2025 WMP cycle years.

[Weather Station Maintenance and Calibration \(WMP.447\); pg 300, SDG&E 2023-2025 Wildfire Mitigation Plan](#)

SDG&E is reinstating WMP.447 (formerly *Advanced Weather Monitoring and Weather Stations*) as Weather Station Maintenance and Calibration in 2024 and proposes a target change that increases its target to 222 weather stations due to the increased scale and change in nature of work. The primary purpose of the SDGE weather network is to monitor dangerous fire weather conditions to include air temperature, wind speed, wind gust, wind direction, and relative humidity. Highly accurate measurements and reliable reporting are critical to understand fire risk and system safety. Station instruments are calibrated annually in alignment with National Weather Service (NWS) procedures and maintenance includes routine replacement of aging sensors. Each station transmits data every 10 minutes both via cellular and spread spectrum radio. The Weather Station Network increases situational awareness and obtains foundational data for operational and mission critical activities.

Calibration and maintenance of weather stations is crucial for ensuring accurate, reliable, and high-quality data. The DGE Weather Station Network standard covers the general purpose, installation, maintenance and access to the weather data. The Weather Station Inspection, Testing and Maintenance standard defines the procedure for performing maintenance and calibration of every weather station in the network at least once annually. SDG&E successfully completed maintenance and calibration activities on 219 of the 222 weather stations year to date in 2023 and will begin reporting on these activities in 2024 via the Quarterly Data Report (QDR) process. SDG&E does not anticipate this change will impact expected wildfire risk reduction within the current WMP cycle.

SDG&E does not propose any changes to forecasted expenditures at this time. Forecasted capital expenditures remain at a total of \$866,000 and forecasted O&M expenditures remain at \$0 for the 2024-2025 WMP cycle years.

3. Expected 2024 Target Changes

SDG&E expects minor target changes for the year 2024 for the following 13 initiatives due to an updated understanding of work forecasts obtained within the past year. However, SDG&E is not submitting these target updates for change order approval as Energy Safety determined they do not meet the criteria set forth in Energy Safety's 2023-2025 WMP Process Guidelines.⁴

Expected 2024 Target Change	2024 Original Target	2024 Expected Target
Distribution OH System Hardening	0 miles	1 mile
Transmission OH Hardening	10.2 miles	16.6 miles
Transmission OH Hardening – Distribution Underbuild	1 mile	4.2 miles
Distribution OH Detailed Inspections	15,450 inspections	16,394 inspections
Transmission OH Detailed Inspections	1,960 inspections	2,005 inspections
Transmission Infrared	6,179 inspections	6,190 inspections
Transmission Wood Pole Intrusive	0 inspections	33 inspections
Distribution OH Patrol Inspections	86,197 inspections	86,229 inspections
Transmission OH Patrol Inspections	6,337 inspections	6,321 inspections
Transmission 69kV Tier 3 Inspections	1,632 inspections	1,602 inspections
Substation Patrol Inspections	384 inspections	378 inspections
QA/QC of Distribution Detailed Inspections	77 inspections	261 inspections
QA/QC of Wood Pole Intrusive Inspections	0 inspections	4 inspections

⁴ Office of Energy Infrastructure Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines (December 6, 2022) at Pgs. 22-28, OEIS Docket No 2023-2025-WMPs.