

**CEJA DATA REQUEST: CEJA-SDG&E-01**  
**R.18-10-007 – SB901 WILDFIRE MITIGATION PLAN OIR**  
**SDG&E RESPONSE**

**Date Received: February 14, 2019**  
**Date Submitted: February 25, 2019**

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**QUESTION 1:**

California Executive Order N-05-19 requires consideration of “socioeconomic factors and vulnerable populations that exacerbate the human toll of wildfires” when CAL FIRE develops a “[m]ethodology to assess which communities are at the greatest risk from wildfire and the projects within/nearby areas that would reduce the threat of a catastrophic wildfire if completed.” When developing your prioritization for hardening the grid, have you considered “socioeconomic factors and vulnerable populations that exacerbate the human toll of wildfires”? If you have, please describe how these factors were considered in the evaluation of how to prioritize projects to harden the grid. If you have not, please describe why these factors have not been considered and any plans you may have to consider these populations in the future.

**RESPONSE 1:**

In terms of prioritization, of the variety of activities that SDG&E undertakes to reduce wildfire risk, only a handful of activities can be prioritized in the usual sense. Most activities are either: a) universally applied within tiers of the High Fire Threat District (HFTD), or b) are situationally dependent upon conditions, such as weather. Neither a) nor b) consider socioeconomic situations. An example of a) is vegetation management, which is carried out with the same standards across all of Tier 3 of the HFTD. An example of b) is the Public Safety Power Shutoff program (PSPS) where areas of high wind and elevated fire risk are considered and depends on real-time situational awareness.

However, a few capital projects do get prioritized by the order of completion. For example, the Fire Risk Mitigation (FiRM) program is prioritized initially by the usage of the Wildfire Risk Reduction Model (WRRM). The raw output of WRRM is then considered to find efficient groupings of electric infrastructure to upgrade. WRRM creates its priorities by both analyzing the likelihood of equipment failure and estimating fire growth at a location if an ignition were to occur. The fire growth modeling does consider human impacts.

Similarly, the Pole Risk Mitigation and Engineering (PRiME) program and Wire Safety Enhancement (WiSE) program predominately rely on likelihood failure and consequence with no bias toward socioeconomic factors. These programs may utilize the WRRM mentioned above to assist in prioritizations.

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**QUESTION 2:**

As described by California Executive Order N-05-19, how do you define populations that are at the greatest risk from wildfires due to socioeconomic factors?

**RESPONSE 2:**

SDG&E has not created such a definition, however, it is likely that populations at greatest risk are those communities affected by wildfires that ignite in the HFTD. These communities include all those within the HFTD as well as those communities that are adjacent to the HFTD – sometimes referred to the Wildland Urban Interface. Factors that may further differentiate these populations are not necessarily based on socioeconomic factors but on risk concerns such as fire suppression abilities, evacuation routes, communication infrastructure, and the availability of electricity.

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**QUESTION 3:**

Your plan includes Community Resilience Centers. Do your Community Resilience Centers include: transportation for community members that do not have access to transportation, filtered air if outside air quality is poor, and plans to work with community organizations and translators to ensure that hard-to-reach and linguistically isolated populations are aware of these centers.

**RESPONSE 3:**

SDG&E's Wildfire Mitigation Plan (WMP or Plan) discusses Community Resource Centers, which are not Community Resilience Centers. SDG&E's Plan at page 62 states: "As a result of community meetings held in the most at-risk communities in SDG&E's service area, SDG&E established Community Resource Centers (CRCs) [to assist] those communities in real time during extreme weather events." These CRCs are powered by portable generation supplied by SDG&E and provide such things as: water, snacks, cell phone charging, and up-to-date information on outages as well as provide the community affected a place to congregate.

While SDG&E does not offer transportation to an activated CRC, these centers were intentionally located within the communities being affected. The CRCs are opened and activated during a PSPS event impacting that specific community but are not open when a wildfire is present and air quality would be an issue. In the event of a wildfire, SDG&E would work with the Red Cross to open emergency evacuation centers located outside an affected area. The intent of a CRC is for temporary support absent an emergency or nearby wildfire.

Further, SDG&E plans to contact community-based organizations it partners with who serve non-English speaking residents. SDG&E will provide these organizations with its translated fire/emergency preparedness information.

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**QUESTION 4:**

With respect to community outreach, how do you plan to conduct outreach to community members who do not speak one of the languages that the material is available in and do not have ready access to the internet? Do you plan to work with community-based organizations to reach populations that have been hard to reach? Do you plan to host community meetings? Where do you plan to host community meetings in 2019?

**RESPONSE 4:**

SDG&E is preparing written materials that provide understanding about the dangers of wildfire, how to prepare and become more resilient to the potential of wildfire and the aspects of PSPS in English, Spanish, and the three most prevalent after English and Spanish. English and Spanish versions are currently available and the other three languages are currently being developed.

As stated in response to Question 3 above, SDG&E plans to contact community-based organizations it partners with who serve non-English speaking residents. SDG&E will provide these organizations with its translated fire/emergency preparedness collateral, including information about its PSPS program and CRCs.

SDG&E has already begun outreach efforts to communities in the HFTD. These meetings are a follow-up to the meetings where SDG&E developed the CRC concept for use during a PSPS event (see also SDG&E's WMP, page 62). In addition, late in 2018, SDG&E began to develop a more in-depth plan to meet with and develop resiliency plans with the same communities that SDG&E met with and developed the CRC concept from. This plan includes dedicated employees whose focus will be meeting with and joining the various planning groups, fire safe councils, CERTs, and other community groups that provide a basis for SDG&E to reach all customers in the communities affected on a more one-on-one basis. These employees will both host and, as SDG&E has already noted, become part of the organizations it seeks to interact with. Specific communication plans are already underway.

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**QUESTION 5:**

Have you conducted any studies or relied on any studies to determine how effective capital expenditures for hardening the system are in relation to reducing wildfire risk? For example, have you studied or relied on studies that evaluate whether changing pole materials reduces wildfire risk? Please describe and produce any studies that you have relied upon related to the effectiveness of infrastructure studies in relation to reduction of wildfire risks.

**RESPONSE 5:**

In accordance with CPUC requirements set forth in Decision (D.) 14-12-025 and D.16-08-018, SDG&E presented a cost effectiveness calculation, referred to as Risk Spend Efficiency (RSE) or risk reduction per dollar spent, in its Risk Assessment Mitigation Phase (RAMP) Report, filed on November 30, 2016 in Investigation (I.) 16-10-015. RSE is a ratio developed to quantify and compare the effectiveness of a mitigation at reducing risk to other mitigations for the same risk. SDG&E included RSE calculations specifically for the risk of Wildfire in its 2016 RAMP Report. As discussed in SDG&E's Plan at 12, SDG&E will file its next RAMP Report in November 2019 which will include new RSE calculations for SDG&E's wildfire risk mitigations.

A discussion of SDG&E's 2016 RAMP Report can be found in SDG&E's Plan beginning on page 13. SDG&E's Wildfire risk chapter in the 2016 RAMP Report can be accessed using the link below:

[https://www.sdge.com/sites/default/files/SDGE-1\\_RAMP\\_Wildfires\\_Caused\\_by\\_SDG%2526E\\_Equipment\\_FINAL.pdf](https://www.sdge.com/sites/default/files/SDGE-1_RAMP_Wildfires_Caused_by_SDG%2526E_Equipment_FINAL.pdf)

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**QUESTION 6:**

With respect to back-up generators for mitigating the impacts of de-energization, what technologies are you examining for back-up generators?

**RESPONSE 6:**

SDG&E intends to implement Backup Power for Resiliency projects, providing back-up power to critical infrastructure, through the use of one or multiple technologies which are currently under evaluation. Such technologies may include but are not limited to, the use of energy storage, renewable and/or non-renewable power generation, and advanced controllers.

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**QUESTION 7:**

Please provide all copies of all data requests and your responses that you have responded to in the above-referenced proceeding.

**RESPONSE 7:**

Data requests propounded in this proceeding and SDG&E's responses thereto, without confidential information, may be obtained from SDG&E's Wildfire Mitigation Plan website: <https://www.sdge.com/rates-and-regulations/proceedings/wildfire-mitigation-plan-oir>