

SB-884 Program: CPUC Guidelines

Publish To: Safety Policy Division – California Public Utilities Commission

Date Received: 6/6/24

Date Responded: 7/26/24

Updated Date Responded: 8/21/24

Please provide responses to the items listed below.

1. Please review, correct and complete all fields listed in the attached excel file (20240604 SDGE Balancing and Memo Accounts for Wildfire Mitigations.xlsx).
 - a. Please use the date of the response to this data request to change the file name following format the “yyyymmdd SDGE Balancing and Memo Accounts for Wildfire Mitigations.xlsx”.
 - b. Please add the date the table was completed in Cell A2
 - c. Please correct any of the names of the wildfire mitigation programs (Column A) implemented by SDG&E. If a wildfire mitigation program is missing from Column A, please add that to the table. If a wildfire mitigation program in Column A is duplicative or not deployed by SDG&E please remove that from the table.
 - i. If this wildfire mitigation program is part of SDG&E’s wildfire mitigation plan, in Column Z, please record the appropriate Utility Initiative Tracking ID for that mitigation.¹
 - d. Please add any missing balancing or memorandum accounts (Column B) for the wildfire mitigation program (Column A). If the authorized revenue from a GRC has an account with a unique name, please add that account name to Column B.
 - e. Please complete Columns G-Y according to the following methods:
 - i. Column G-H: This should include the GRC authorized revenue requirement dollar amount for the wildfire mitigation (Column A) that has already entered rates as of June 1st 2024. CapEx should be recorded in Column G and OpEx should be recorded in Column H.
 - ii. Column I-J: This should include the GRC authorized revenue requirement dollar amount for the wildfire mitigation (Column A) that as of June 1st 2024 has yet to enter rates but is expected to do so. CapEx should be recorded in Column I and OpEx should be recorded in Column J.
 - iii. Column K-L: This should include any recorded costs for the wildfire mitigation (Column A) that go beyond the GRC authorized revenue requirement and has already entered rates as of June 1st 2024 through the Commission authorized Balancing or Memorandum Account (Column B). CapEx should be recorded in Column K and OpEx should be recorded in Column L.
 - iv. Column M-N: This should include any recorded costs for the wildfire mitigation (Column A) that go beyond the GRC authorized revenue requirement and has yet to enter rates as of June 1st 2024 but is expected to do so through the Commission authorized Balancing or Memorandum Account (Column B). CapEx should be recorded in Column M and OpEx should be recorded in Column N.
 - v. Column O-P: This should include any recorded costs that have not otherwise been recovered in revenue requirements approved in the GRC or any other proceeding for the wildfire mitigation (Column A) that has already entered rates

¹ This should be the same designation that is included in the Office of Energy Infrastructure Safety’s Quarterly Data Reports Template, Table 1, Column N. See also Office of Energy Infrastructure Safety Energy Safety Data Guidelines v3.2 pg. 48.

SB-884 Program: CPUC Guidelines

Publish To: Safety Policy Division – California Public Utilities Commission

Date Received: 6/6/24

Date Responded: 7/26/24

Updated Date Responded: 8/21/24

as of June 1st 2024 through the Commission authorized Balancing or Memorandum Account (Column B). CapEx should be recorded in Column O and OpEx should be recorded in Column P.

- vi. Column Q-R: This should include any recorded costs that have not otherwise been recovered in revenue requirements approved in the GRC or any other proceeding for the wildfire mitigation (Column A) that has yet to enter rates as of June 1st 2024 but is expected to do so through the Commission authorized Balancing or Memorandum Account (Column B). CapEx should be recorded in Column Q and OpEx should be recorded in Column R.
- vii. Column S-T: This should include any forecasted revenue requirements that have been submitted to an open GRC proceeding for the wildfire mitigation (Column A) and would be expected to enter rates through the Commission authorized Balancing or Memorandum Account (Column B). CapEx should be recorded in Column S and OpEx should be recorded in Column T.
- viii. Column U-V: This should include any forecasted revenue requirements that have been submitted to an open Non-GRC proceeding for the wildfire mitigation (Column A) and would be expected to enter rates through the Commission authorized Balancing or Memorandum Account (Column B). CapEx should be recorded in Column U and OpEx should be recorded in Column V.
- ix. Column W: Total for Columns G-V for the authorized revenue, the balancing account or the memorandum account (Column B)
- x. Column X: Please provide the total of any Third-Party or Other funding sources for the wildfire mitigation (Column A).
- xi. Column Y: Total of all Account Totals (Column W) plus the Third-Party or Other Funding Sources (Column X) for the wildfire mitigation (Column A).
- xii. Columns G-V should include any authorized revenue, recorded costs or pending revenue requests from when the authorized revenue, the balancing account or memorandum account (Column B) was established or when the pending revenue request application was filed up to the present (i.e. approximately 2017-June 1st, 2024).
- xiii. Please report Columns G-V and Column X in 2024 dollars.

SB-884 Program: CPUC Guidelines

Publish To: Safety Policy Division – California Public Utilities Commission

Date Received: 6/6/24

Date Responded: 7/26/24

Updated Date Responded: 8/21/24

Updated SDG&E Response 1:

Please see the attached Excel file titled “20240805 SDGE Balancing and Memo Accounts for Wildfire Mitigations.xlsx”.

Please note:

1. The “Wildfire Mitigation” categories are consistent with OEIS 2022 WMP guidelines.
2. The 2024 GRC revenue requirements are based on the 2024 GRC O&M and capital forecasts as of July 2023. These are subject to change once a final decision is approved and issued.
3. 2019-2022 WMP incremental costs are currently being addressed in the Track 2 of the 2024 GRC.
 - a. Currently, SDG&E does not have the ability to calculate the authorized and recorded revenue requirements for each individual Wildfire Mitigation category.
 - b. At the direction of SPD, SDG&E created a high-level proportion to impute the WMP mitigation category revenue requirements.
 - c. The authorized and actual O&M and capital expenditure direct costs are the basis for these revenue requirement proportions.
 - d. The resulting imputed revenue requirements included in this schedule are illustrative and do not imply accuracy.
 - e. SDG&E’s Track 2 request does not include tree trimming costs; the Track 2 vegetation management-related request is limited to SDG&E’s pole brushing activities, which are currently recorded to the WMPMA.
4. SDG&E does not calculate a FERC revenue requirement specific to WMP.
5. SDG&E does not collect any WMP revenue outside of GRC proceedings or FERC process.
6. The current draft schedule that is attached to this response does not include gas related detail.

Data Request Number: SPD-SDGE-SB884-003

SB-884 Program: CPUC Guidelines

Publish To: Safety Policy Division – California Public Utilities Commission

Date Received: 6/6/24

Date Responded: 7/26/24

Updated Date Responded: 8/21/24

2. Please provide a narrative explanation for the existence of the Wildfire Mitigation Plan Memorandum Account-Gas. What is the purpose of this account? How are the costs recorded in this account related to SDG&E's Wildfire Mitigation Plan?

SDG&E Response 2:

The WMP program is a program focused on how to reduce wildfire risk for which all activities and projects are focused on the electric system. However, the accounts adopted by the CPUC include Administrative & General common O&M accounts and General/Common Plant accounts where IT and Facilities costs are recorded. These common and general accounts have a required allocation to the electric and gas businesses. The Wildfire Mitigation Plan Memorandum Account-Gas captures the Administrative and General, IT and Facilities costs that were incurred to benefit wildfire risk reduction on the electric system but were required to be allocated to gas.