

Company: San Diego Gas & Electric Company (U 902 M)
Proceeding: 2024 General Rate Case – Track 2
Application: A.22-05-016
Exhibit: SDG&E-T2-01R-D

**CHAPTER 1 REVISED PREPARED DIRECT TESTIMONY OF
JONATHAN WOLDEMARIAM ON BEHALF OF
SAN DIEGO GAS & ELECTRIC COMPANY**

(APPENDIX D – WILDFIRE SAFETY DIVISION – COMPLIANCE OPERATIONAL PROTOCOLS)

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



February 9, 2024

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 16, 2021

SUBJECT: Wildfire Safety Division – Compliance Operational Protocols**This letter issues guidance on the contents, format, and timing of the compliance reporting Wildfire Safety Division requires of the electrical corporations****SUMMARY**

Pursuant to Public Utilities Code (PUC) §8386.3(c)(1), electrical corporations (ECs) must file with the Wildfire Safety Division (WSD) annual reports addressing compliance with their approved Wildfire Mitigation Plans (WMP) during the prior calendar year. PUC §8389(e)(7) requires ECs to file Tier 1 advice letters on a quarterly basis that detail the implementation of their approved WMPs. To this end, ECs have been submitting their quarterly §8389(e)(7) reports but have not used a consistent format. To ensure consistency going forward, this letter defines annual and quarterly reporting requirements for all ECs, and provides guidance to ECs on the contents, format, and timing of the annual and quarterly reports¹. The WSD will use the reports to ensure ECs are taking effective actions to reduce EC-related wildfire risk.

The annual compliance period for 2020-2022 WMPs is defined as January 1 to December 31 for each calendar year of the three-year WMP. The annual report will be due no later than three months following the expiration of the previous calendar year². The quarterly reports will be due within approximately one month of the end of each quarter³. Each quarter is defined as January 1 to March 31 (Q1), April 1 to June 30 (Q2), July 1 to September 30 (Q3), October 1 to December 31 (Q4).

In response to the public comments submitted by ECs (regarding the draft Compliance Operational Protocols released on January 8, 2021) requesting further engagement on the reporting requirements set out in this guidance, the WSD plans to engage with ECs to answer any remaining questions that are not addressed in this final Compliance Operational Protocols guidance.

¹ The WSD will consider phasing out Class B ongoing reporting requirements as a separate requirement (Quarterly Reports) as part of the 2021 Wildfire Mitigation Plan review.

² The annual report will be due on March 31 of each calendar year.

³ The quarterly reports for the first three quarters will be due on the 1st of the second month following the completion of the quarter, while the quarterly report for the fourth quarter will be due on the WMP submission date of the following year. Should the 1st fall on a weekend or holiday, quarterly reporting shall be submitted on the following business day.

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DISCUSSION

The WSD requires the following submissions from ECs to support the WSD's compliance reviews:

1. Quarterly reporting, inclusive of three components:
 - a. Quarterly Initiative Updates (EC QIU)
 - b. Quarterly Data Report (EC QDR)⁴
 - c. Quarterly Advice Letters (EC QAL) (also referred to as Tier 1 Advice Letters), pursuant to PUC §8389(e)(7)⁵
2. Annual Report on Compliance (EC ARC), pursuant to PUC §8386.3(c)(1)

Consistent reporting requirements will reduce ad hoc data requests from the WSD to ECs and streamline communications between the WSD and ECs. Going forward, EC submissions are to be submitted to the WSD on a consistent and regular cadence. Figure 1 and the accompanying notes below outline the submission cadence for a given year (see Appendix for in-depth detail on content, format, and logistics for each submission).

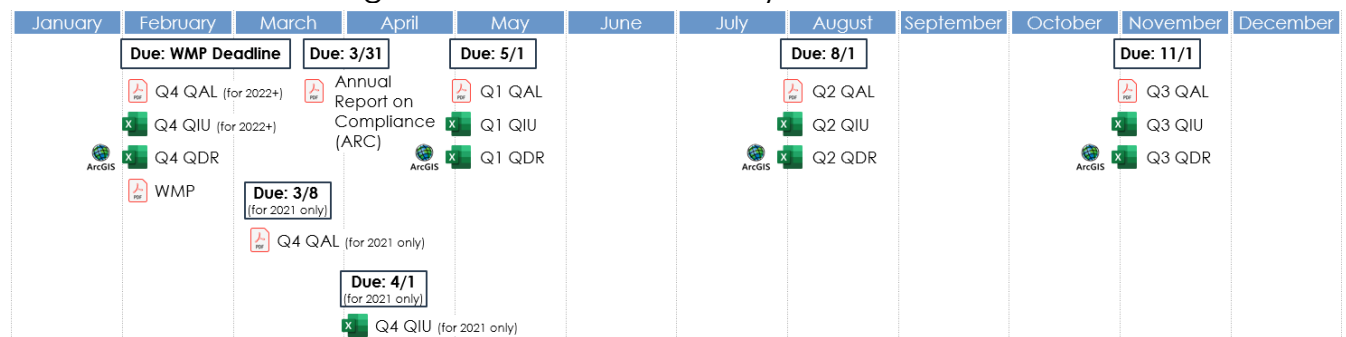


Figure 1. Annual Cadence of Electrical Corporation Submissions to WSD

Figure 1 Notes:

- The compliance period is defined as January 1 to December 31 of each calendar year. For the Annual Report on Compliance (EC ARC) due March 31, 2021, the EC shall report on the prior compliance period, defined as January 1, 2020 to December 31, 2020.
- Quarterly reporting shall be submitted on a quarterly basis on the 1st of the second month following the completion of the quarter for the first three quarters, e.g. Q1 report covering January 1 to March 31 shall be due May

⁴ The Quarterly Data Report is an ongoing Class B condition (Guidance-10, WSD-002) of which ECs have already been informed.

⁵ Quarterly Advice Letters are not required from ECs that have not applied for a Safety Certificate, as PUC §8389(e)(7), the Tier 1 advice letter quarterly reporting requirement, appears in the section of the statute that lays out the safety certificate requirements.

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1, Q2 due August 1, Q3 due November 1. Should the 1st fall on a weekend or holiday, quarterly reporting shall be submitted on the following business day. For the fourth quarter, Q4 quarterly reporting shall be submitted on the WMP submission date of the following year.⁶

The first set of quarterly compliance reporting due to WSD following this letter, covering Q4 2020, would typically be due on February 5, 2021 or March 5, 2021 based on the designated WMP submission date. However, to provide ECs with sufficient time to prepare their quarterly reporting, WSD will extend the deadline for the Q4 2020 QAL March 8, 2021 for all ECs, and the deadline for the Q4 2020 QIU to April 1, 2021. The Q4 2020 QDR submission, however, is still due on the designated WMP submission date. For 2021 Q1 submissions onwards, ECs shall submit all quarterly reporting by the deadlines set out in this letter.

Figure 2 below lays out the contents of the submissions at a high level; see the Appendix for in-depth detail on the content, format, and submission logistics for each submission.

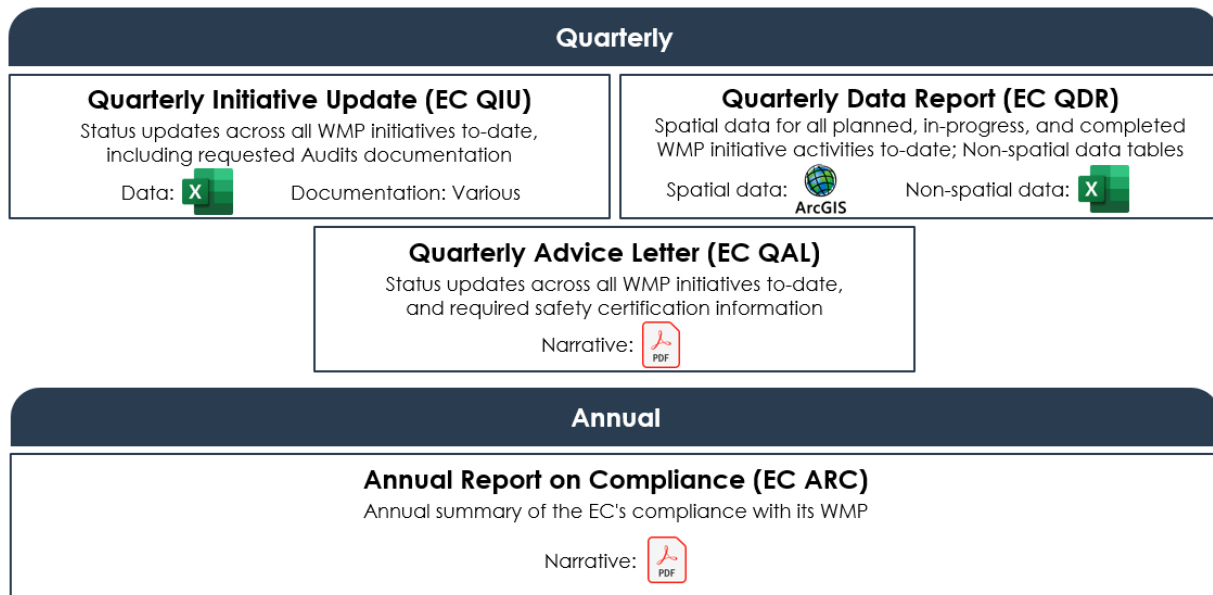


Figure 2. Electrical Corporation Submissions to WSD

The scope of the WSD's authority is set forth in Resolution WSD-012. Under the Resolution, the WSD will conduct inspections and audits pursuant to PUC §§326(a)(1) (requiring the WSD to oversee and enforce ECs' compliance with wildfire safety pursuant to §8385 et seq.) and §8386.3(c) (requiring WSD to oversee compliance with the WMPs).

⁶ Q4 quarterly reporting is due on the same date that WMP submissions are due.

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Should defective conditions, or defects, be identified through these inspections and audits, Resolution WSD-012 provides that WSD will work with the ECs to minimize and/or resolve wildfire safety issues and noncompliance with WMP initiatives. Specific consequences resulting from the compliance assessment will include notices of non-compliance resulting from a failure to timely correct defects. The WSD may recommend that the Commission pursue an enforcement action against the electrical corporation for noncompliance with its approved plan, pursuant to PUC §8389(g).

The WSD will share Inspection and Audit Reports, including its findings, with ECs. ECs shall respond and remediate identified defects in accordance with timelines for corrective action established in Resolution WSD-012, adopted by the Commission on November 19, 2020 (see Appendix for in-depth detail on all EC submissions and defect response and corrective action timing).

The final guidance issued herein will remain in place when WSD transitions into the Office of Energy Infrastructure Safety (OEIS) under the California Natural Resources Agency (CNRA) by July 1, 2021. Additional guidance may be provided at that time.

For questions regarding the guidance provided in this letter, please contact MaryBeth Farley in the Wildfire Safety Division, at Marybeth.Farley@cpuc.ca.gov and Ed Chavez in the Wildfire Safety Division, at Edward.Chavez@cpuc.ca.gov, with a copy to wildfiresafetydivision@cpuc.ca.gov.

Sincerely,



Caroline Thomas Jacobs
Director, Wildfire Safety Division
California Public Utilities Commission

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APPENDIX

Part 1. Electrical Corporation Submissions

The Wildfire Safety Division provides the following guidance regarding the required EC submissions for:

1. Quarterly reporting, inclusive of three components:
 - a. Quarterly Initiative Updates (EC QIU)
 - b. Quarterly Data Report (EC QDR)⁴
 - c. Quarterly Advice Letters (EC QAL) (also referred to as Tier 1 Advice Letters), pursuant to PUC §8389(e)(7)⁵
2. Annual Report on Compliance (EC ARC), pursuant to PUC §8386.3(c)(1)

1a. Quarterly Initiative Update (EC QIU)

The purpose of the QIU is for both the EC and WSD to have a holistic understanding of the EC’s annual targets and projected quarterly progress for each initiative at the beginning of each reporting year. This information will enable WSD to track the EC’s compliance to its initiative targets throughout the year, leveraging the information contained in both the QIU and the QDR (see appendix item 1b below for details).

Table 1 below lays out the contents, format, and submission timing and logistics for the Quarterly Initiative Update that ECs shall submit on a quarterly basis.

<u>Contents</u>	The Quarterly Initiative Update shall include: <ol style="list-style-type: none">1) Annual targets and projected quarterly progress for all initiatives (both quantitative and qualitative) laid out in the EC's Wildfire Mitigation Plan, with each quarterly submission including status updates for each initiative for the prior calendar quarter; supplements EC QAL information in Excel format.2) Supplemental file requirements, as needed. The WSD may use, but are not limited to, the supplemental files to conduct audits against stated progress in the EC's Initiative Update. Audit Reports will be filed to notify the EC of defects where necessary.
<u>Format</u>	1) Item 1 above shall be submitted in excel format, with file name formatted as such: '[Electrical Corporation Name]_202X QX QIU_[YYYYMMDD Submission Date]', e.g., 'EC_2021 Q1 QIU_20210501'. The submission template for the QIU will be provided as an attachment to this letter; each initiative shall be provided as a line item with the following fields: <ul style="list-style-type: none">o Utility ID

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	<ul style="list-style-type: none">○ Submission Date○ WMP Initiative Category⁷○ WMP Initiative Activity⁸○ Utility Initiative Name⁹○ Initiative Activity ID⁹○ WMP Initiative Code¹⁰○ WMP Page Number○ Measurement units for quantitative targets○ Annual Target (for quantitative initiatives)○ Quantitative Projected Quarterly Progress (by quarter, cumulative)¹¹○ QX – Quantitative Actual Progress (for designated quarter, cumulative)¹¹○ Annual Target (for qualitative initiatives)○ QX – Qualitative Progress (for designated quarter, cumulative)¹¹○ Status (Completed, In Progress, Planned, Delayed, Cancelled)○ Corrective Actions for Behind Schedule / Off Track Initiatives <p>2) Item 2 above shall be submitted in excel format, on an as-requested basis when the WSD conducts audits. WSD will request supplemental files by returning to the EC a modified/updated version of the QIU (Excel file submitted in Item 1). The EC shall then submit, within 5-10 business days of receiving the supplemental file request from WSD, a further modified version of the Excel file that includes links to Kiteworks folders containing the required supplemental files.</p>
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⁷ WMP Initiative Category refers to the 10 categories outlined in Section 7.3.2 of the 2021 WMP Guidelines (see details here:

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organization/Divisions/WSD/Attachment%202.2%20to%20WSD-011%20-%202021%20WMP%20Guidelines%20Template.pdf). The EC shall provide the WMP Initiative Category Name, and the Number will auto-generate.

⁸ WMP Initiative Activity refers to the 87 activities outlined in Section 7.3.2 of the 2021 WMP Guidelines (see link in footnote 7). The EC shall provide the WMP Initiative Activity Name, and the Number will auto-generate. If the Activity Name is "Other," EC shall provide an Activity Name that aligns with the Activity in its WMP.

⁹ Utility Initiative Name and Initiative Activity ID shall reflect the EC's internal nomenclature and code for each initiative. The Initiative Activity ID should align with the "LogID" fields submitted in the EC QDR (i.e., "GhLogID", "AiLogID", "VmiLogID", "VmpLogID", or other "LogID" fields in future spatial schema).

¹⁰ WMP Initiative Code will auto-generate.

¹¹ Projected Quarterly Progress and Actual Quarterly Progress shall be provided as cumulative by quarter, i.e., Q1 projected/progress shall cover January 1-March 31, cumulative Q2 projected/progress shall cover January 1-June 30, cumulative Q3 projected/progress shall cover January 1-September 30, and cumulative Q4 projected/progress shall cover January 1-December 31 (total annual target/progress). Note that all Projected Quarterly Progress columns shall be completed in the Q1 submission.

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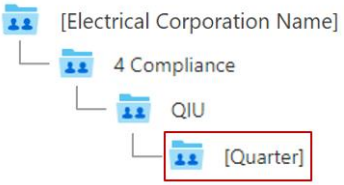

<p><u>Submission timing and logistics</u></p>	<p>EC QIU shall be submitted on a quarterly basis on the 1st of the second month following the completion of the quarter, e.g., Q1 report covering January 1-March 31 is due May 1 (should the 1st fall on a weekend or holiday, quarterly reporting shall be submitted on the following business day). The one exception is Q4, which shall be submitted at the same time as the Wildfire Mitigation Plan in early February of the following year. Submissions shall be uploaded to each EC's folder in Kiteworks according to the following folder structure:¹²</p>  <pre>graph TD; EC["[Electrical Corporation Name]"] --> C4["4 Compliance"]; C4 --> QIU["QIU"]; QIU --> Q["[Quarter]"]</pre> <p>If supplemental files are requested by WSD, each EC shall upload any required supplemental files to its folder in Kiteworks, according to the following folder structure:</p>  <pre>graph TD; EC["[Electrical Corporation Name]"] --> C4["4 Compliance"]; C4 --> Audits["Audits"]; Audits --> IC["[Initiative Category]"]; IC --> WMP["[WMP Initiative Code]"]</pre> <p>ECs shall specify the Initiative Category and Initiative folder names using WMP terminology.^{7,8}Error! Bookmark not defined. All file names must be formatted as such: '[<i>Electrical Corporation Name</i>][<i>Initiative Activity ID</i>][<i>YYYYMMDD Submission date</i>]'.⁹ If multiple JPEG or PNG photo files are provided in the same Kiteworks folder, those file names must also include a geotag (e.g., include District ID in file name) and be appended with a 3-digit number (e.g., _001, _002). Provision of supplemental files is required within 5-10 business days of receiving the supplemental file request. If the EC believes that any documents submitted pursuant to this letter are confidential, then it shall follow the steps detailed in General Order 66-D.</p>
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Table 1. Quarterly Initiative Updates: Contents, Format, and Submission Logistics and Timing

1b. Quarterly Data Report (EC QDR)

The purpose of the spatial data submitted in the QDR is to provide WSD with the locations of projects associated with utility initiatives. This data, along with the annual targets and quarterly progress provided in the QIU, will enable WSD to effectively assess EC compliance throughout the year.

¹² Quarter-level folder names shall be formatted as such: '[YYYYQX]', e.g., '2021Q1'.

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Table 2 below lays out the contents, format, and submission timing and logistics for the Quarterly Data Report that ECs shall submit on a quarterly basis.

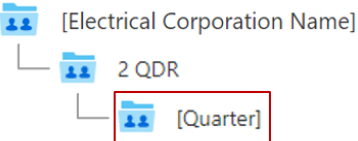
<u>Contents</u> ¹³ :	The Quarterly Data Report is an ongoing Class B condition (Guidance-10, WSD-002) of which ECs have already been informed. It includes performance, progress, and outcome metrics (see footnote 13 for link to detailed QDR guidance). The Quarterly Data Report shall include: 1) A geospatial (GIS) database providing quarterly updates on planned, in-progress, and completed initiative activity points, lines, and polygons, based on the last day of the calendar quarter of the report. The QDR will provide unique Initiative Activity IDs for each activity point, and each activity point will tie to a specific WMP Initiative Code. 2) A non-spatial Excel file that includes all requested data within the provided template.
<u>Format</u>	1) Item 1 above shall be submitted in geodatabase form, formatted in accordance to previously provided guidance from the Wildfire Mitigation branch, with file name formatted as such: '[<i>Electrical Corporation Name</i>] _{QX} [YYYYMMDD Submission date]', e.g., 'EC_Q1_20210501'. 2) Item 2 above shall be submitted in Excel file form, formatted in accordance to previously provided guidance from the Wildfire Mitigation branch, with file name formatted as such: '[<i>Electrical Corporation Name</i>] _{QX} [YYYYMMDD Submission date]', e.g., 'EC_Q1_20210501'.
<u>Submission timing and logistics</u>	EC QDR shall be submitted on a quarterly basis on the 1 st of the second month following the completion of the quarter, e.g., Q1 report covering January 1-March 31 is due May 1 (should the 1 st fall on a weekend or holiday, quarterly reporting shall be submitted on the following business day). The one exception is Q4, which shall be submitted at the same time as the Wildfire Mitigation Plan in early February of the following year. Submissions shall be uploaded to each EC's folder in Kiteworks according to the following folder structure: ¹² 

Table 2. Quarterly Data Report: Contents, Format, and Submission Logistics and Timing

¹³ Non-exhaustive description of contents required in spatial and non-spatial Quarterly Data Report. Full scope of requested QDR data can be found by referencing the latest QDR non-spatial template and QDR spatial data schema (for details, copy and paste the following download link into a browser:

<ftp://ftp.cpuc.ca.gov/WMP/2021/GIS/WSD%20GIS%20Data%20Reporting%20Standard.pdf>)

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1c. Quarterly Advice Letters (EC QAL), also referred to as Tier 1 Advice Letters (see § 8389(e)(7))

Pursuant to § 8389(e)(7), the purpose of the QAL is to detail the implementation of the EC's approved wildfire mitigation plan and recommendations of the most recent safety culture assessment, and provide a statement of the recommendations of the board of directors safety committee meetings that occurred during the quarter. The QAL also summarizes the implementation of the safety committee recommendations from the electrical corporation's previous QAL filing.

Table 3 below lays out the contents, format, and submission timing and logistics for the Quarterly Advice Letters that ECs shall submit on a quarterly basis.⁵

Contents	The Quarterly Advice Letter submitted by each EC shall include: 1) Status updates for the prior calendar quarter of all initiatives laid out in the EC's Wildfire Mitigation Plan. 2) All requirements per statute (§ 8389(e)(7)), i.e., the recommendations of the most recent safety culture assessment, a statement of the recommendations of the board of directors safety committee meetings that occurred during the quarter, and a summary of the implementation of the safety committee recommendations from the previous QAL filing.
Format	1) Item 1 above shall be submitted in pdf format, with file name formatted as such: '[<i>Electrical Corporation Name</i>]_202X QX QAL_[YYYYMMDD Submission date]', e.g., 'EC_2021 Q1 QAL_20210501'. Consistent with December 19, 2019 Administrative Law Judge Ruling ALJ/SRT/jt2, the format shall be the same, including using the same colors, as Southern California Edison Company's July 2019 report . Each initiative update shall include the following information: <ul style="list-style-type: none">o Section and Page number of the EC's Wildfire Mitigation Plan where the initiative is applicableo Status (Completed, In Progress, Planned, Delayed, Cancelled)
Submission timing and logistics	EC QALs shall be submitted on a quarterly basis on the 1 st of the second month following the completion of the quarter, e.g., Q1 report covering January 1-March 31 is due May 1 (should the 1 st fall on a weekend or holiday, quarterly reporting shall be submitted on the following business day). The one exception is Q4, which shall be submitted at the same time as the Wildfire Mitigation Plan in early February of the following year. Submissions shall be uploaded to each EC's folder in Kiteworks according to the following folder structure: ¹²

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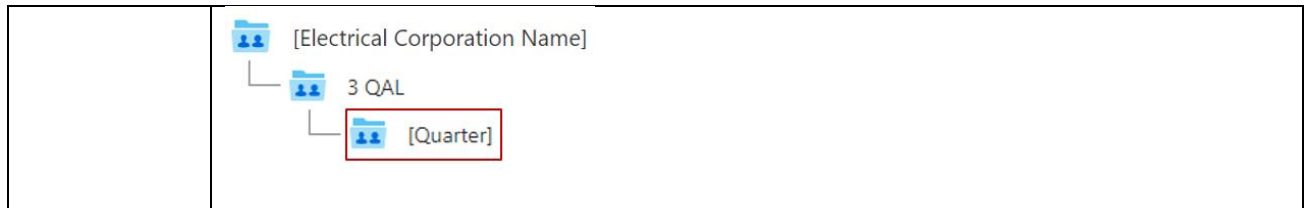


Table 3. Quarterly Advice Letters: Contents, Format, and Submission Logistics and Timing

2. Annual Report on Compliance (EC ARC) (see §8386.3(c)(1))

Pursuant to §8386.3(c)(1), the purpose of the ARC is to detail the EC’s compliance with its WMP during the prior calendar year.

Table 4 below lays out the contents, format, and submission timing and logistics for the Annual Report on Compliance that ECs shall submit by March 31 of each year.

<u>Contents</u>	The Annual Report on Compliance submitted by each EC shall include: 1) A written narrative including: a. An assessment of whether the EC met the risk reduction intent by implementing all of their approved WMP initiatives, i.e., the degree to which initiative activities have reduced ignition probabilities; ¹⁴ i. If the EC fails to achieve the intended risk reduction, EC shall provide a detailed explanation of why and a reference to where associated corrective actions are incorporated into their most recently submitted WMP. b. A full and complete listing of all change orders and any other operational changes, such as initiative location changes, made to WMP initiatives, with an explanation of why the changes were necessary, and an assessment of whether the changes achieved the same risk reduction intent; c. Descriptions of all planned WMP initiative spend vs actual WMP initiative spend and an explanation of any differentials between the planned and actual spends; d. A description of whether the implementation of WMP initiatives changed the threshold(s) for triggering a PSPS event and/or reduced the frequency, scale, scope and duration of PSPS events;
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¹⁴ Explanation of how ignition probabilities and estimated wildfire consequences have been reduced during the compliance period as a result of WMP initiative implementation (i.e., for the EC ARC due March 31, 2021, the EC shall report on the prior compliance period, defined as January 1, 2020 to December 31, 2020).

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	e. A summary of all defects identified by the WSD within the annual compliance period, the corrective actions taken and the completion and/or estimated completion date ¹⁵ .
<u>Format</u>	1) Items 1a. through 1e. above shall be submitted in pdf format, with file name formatted as such: '[Electrical Corporation Name]_202X ARC_[YYYYMMDD Submission date] ', e.g., 'EC_2020 ARC_20210331'.
<u>Submission timing and logistics</u>	EC ARCs shall be submitted no later than March 31. Submissions shall be uploaded to each EC's folder in Kiteworks according to the following folder structure: ¹⁶  <pre>graph TD; EC["[Electrical Corporation Name]"] --> C["4 Compliance"]; C --> ARC["ARC"]; ARC --> Y["[Year]"]; style Y stroke:#f00</pre>

Table 4. Annual Report on Compliance: Contents, Format, and Submission Logistics and Timing

Table 5 below provides a summary of all EC Reports referenced in this Appendix tagged by submission file type and upload folder location.

¹⁵ The defect summary component of the ARC contents does not supplant detailed defect correction responses, which shall be filed with WSD throughout the year as needed (see Appendix Part 2. Response and Corrective Action Timeline for details).

¹⁶ Year-level folder names shall denote the year of the report being submitted, i.e., for the 2020 ARC submitted March 31, 2021, the folder shall be named as such: '2020'.

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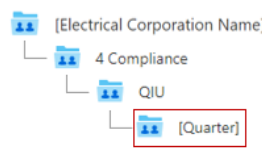

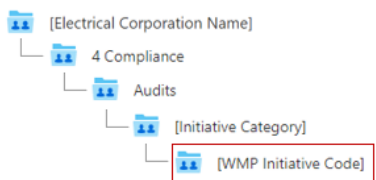




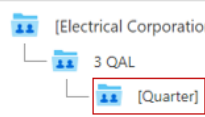

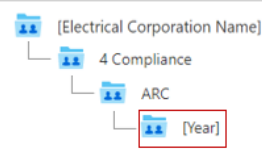
EC Report	Submissions	Submission Location
Quarterly Initiative Update (EC QIU)	Data: 	
	Documentation: 	
Quarterly Data Report (EC QDR)	Spatial data: 	
	Non-spatial data: 	
Quarterly Advice Letter (EC QAL)	Narrative: 	
Annual Report on Compliance (EC ARC)	Narrative: 	

Table 5. Summary of EC Report Submissions

Part 2. Response and Corrective Action Timeline

Following an inspection or audit, the WSD will prepare an Inspection Report or Audit Report. If a defect¹⁷ is identified, a timeline of corrective action will be included in the Audit/Inspection Report. This Inspection Report or Audit Report will be shared with the EC via email. ECs shall adhere to the following timelines as stated in The WSD Wildfire Mitigation Plan Compliance Process (Resolution WSD-012 – Attachment 1):

1. Response time: ECs shall respond to Inspection Reports and Audit Reports with a confirmed plan and timeline for corrective action within 10 calendar days of receiving the report. If an EC is notified of a defect in the

¹⁷ Per WSD-012, the Wildfire Mitigation Plan Compliance Process defines a defect as ‘any condition noted that is inconsistent with the WMP initiatives or CPUC General Orders’.

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Severe Category, the EC must make immediate confirmed contact with the inspector by phone to provide the EC's plan of action to remediate the Severe defect, and confirm the timeline with the inspector. The EC must provide this plan of action and timeline to the WSD in writing within 3 calendar days of being initially notified of the Severe defect. If the EC does not agree with the categorization of the Severe defect the WSD has identified, the EC shall provide the WSD Inspector with a written explanation within 3 calendar days of being initially notified of the Severe defect.

2. Timeline for corrective actions: Depending on the level of defect severity, the WSD requires ECs to correct defects within a prescribed deadline, as shown in the timelines in Table 6 below:

Category	Correction
Category 1 – Severe	Immediate resolution
Category 2 – Moderate	1-2 months (in HFTD Tier 3) 3-6 months (in HFTD Tier 2) 6 months (if relevant to worker safety) 12 months or scheduled in WMP update (other)
Category 3 – Minor	12 months or resolution schedule included in WMP update

Table 6. Defect correction timelines

Under Resolution WSD-012, the WSD will work with the ECs to minimize and/or resolve wildfire safety issues and noncompliance with WMP initiatives. Specific consequences resulting from the compliance assessment will include notices of non-compliance resulting from a failure to timely correct defects. The WSD may also recommend that the Commission pursue an enforcement action against the EC for noncompliance with its approved plan, pursuant to PUC §8389(g). WSD anticipates posting Notices of Noncompliance on the WSD website as they occur.

In cases where the EC does not agree with the categorization of the defect WSD has identified, the EC shall provide the WSD Inspector who identified the issue with a written explanation within 3 calendar days for Category 1 defects and within 10 calendar days for Category 2 and 3 defects.