

MGRA DATA REQUEST: MGRA-SDG&E-02
R.18-10-007 – SB901 WILDFIRE MITIGATION PLAN OIR
SDG&E RESPONSE

Date Received: March 4, 2019
Date Submitted: March 7, 2019

QUESTION 1:

What is the internal enforcement mechanism that the utility will use to ensure that all goals set in the Wildfire Mitigation Plans are met?

RESPONSE 1:

Please refer to SDG&E's Wildfire Mitigation Plan's at page 72, Section 6.1, which states:

...SDG&E's Director of the Fire Science & Climate Adaptation department (the wildfire risk manager) and the Vice President (VP) of Electric System Operations (the wildfire risk owner) have primary responsibility for owning, executing, and auditing this Plan. Wildfire mitigation at SDG&E is a Company-wide, inter-departmental effort involving resources and programs across utility functions. As such, SDG&E has developed a cross-functional organization to govern the development and implementation of its wildfire mitigation strategy, program prioritization, resourcing, implementation, and tracking which is governed by the Company's cross-functional organizations.

SDG&E's wildfire mitigation governance organization involves three teams and one functional department, each with specific responsibility to the successful development and implementation of the Company's wildfire mitigation strategy. Members of each team represent functions across the organization and range from executive-level to individual process or program owners and subject matter experts. The governance bodies include: Executive Wildfire Council, Fire Directors Steering Committee, Community Fire Safety Plan, and the Fire Science & Climate Adaption Department.

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QUESTION 2:

Provide three realistic scenarios in which a utility might start a wildfire and then be held to be imprudent for purposes of cost recovery and in which that imprudence would be tied back to lack of compliance with the Wildfire Mitigation Plan. These scenarios would assume the absence of any other Prudent Manager Standard.

RESPONSE 2:

SDG&E objects to the question on the grounds that it is vague, calls for speculation, and seeks legal conclusions. Without waiving these or any other objection SDG&E responds as follows: To the extent this question asks for the production of a study or document meeting the criteria in the question, SDG&E has no such studies or documents. However, a utility could be denied cost recovery, in full or in part, if it failed to substantially comply with its Wildfire Mitigation Plan, and that failure directly caused a catastrophic wildfire. If failure to substantially comply with its CPUC-approved Wildfire Mitigation Plan could be tied to intentional misconduct by the utility, reckless conduct by the utility, or where the failure was part of a pattern of consistent violations in an area, cost recovery would be jeopardized.