

Company: San Diego Gas & Electric Company (U 902 M)
Proceeding: 2024 General Rate Case – Track 3
Application No.: A.22-05-016
Exhibit: SDG&E-T3-WMPMA-10

**SUPPLEMENTAL TESTIMONY OF
JONATHAN WOLDEMARIAM
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY
(TRACK 3 – WILDFIRE)**

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



March 2026

TABLE OF CONTENTS

I. INTRODUCTION AND QUALIFICATIONS1
II. PURPOSE OF TESTIMONY.....2

Appendix A - Track 3 WMP Initiative Cost Breakdown

Appendix B - Track 3 WMP Initiative Risk Spend Efficiencies

1 **SUPPLMENTAL TESTIMONY OF JONATHAN WOLDEMARIAM**
2 **ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**

3
4 **I. INTRODUCTION AND QUALIFICATIONS**

5 **Q. Please state your name, position, and business address.**

6 A. My name is Jonathan T. Woldemariam. I am employed by San Diego Gas & Electric
7 Company (SDG&E) as the Director of Wildfire Mitigation. My business address is 8330
8 Century Park Court, San Diego, California, 92123.

9 **Q. Please describe your current responsibilities.**

10 A. I am responsible for developing and overseeing the execution of the SDG&E's Wildfire
11 Mitigation Plan (WMP), which includes the vegetation management program. I work to
12 optimize a portfolio of initiatives to help decrease wildfire risk.

13 **Q. Please describe your educational and professional background.**

14 A. I have a bachelor's degree in electrical engineering, with a major field of study in
15 Electrical Power and am a licensed Professional Engineer in California. I joined SDG&E in
16 1994 and have served as a director for Transmission and Substation Operations, Electric
17 Transmission and Distribution Engineering, and Construction Services. I have over 28 years of
18 experience in the electric utility industry. I recently transitioned from serving on the Board of
19 Directors for 2-1-1 San Diego to serving on the Board of Directors for the San Diego Fire-
20 Rescue Foundation, a local non-profit which helps provide first responders with the enhanced
21 resources they need to better protect our community.

22 **Q. Have you previously testified before this California Public Utilities Commission**
23 **(Commission or CPUC)?**

24 A. Yes, I have previously testified before the Commission.

25 **Q. Have you previously testified in this proceeding?**

1 A. Yes. I sponsored Chapter 1 (Wildfire) of SDG&E’s Track 3 filing and have also
2 submitted rebuttal testimony addressing intervenor testimony in this Track 3 proceeding.

3 **Q. Can you please provide a brief overview of your previous testimony in this**
4 **proceeding?**

5 A. My direct testimony describes SDG&E’s WMP initiatives implemented in 2023 and
6 presents the direct costs associated with their implementation. My rebuttal testimony responds to
7 intervenors challenges regarding the reasonableness of SDG&E’s direct costs.

8 **II. PURPOSE OF TESTIMONY**

9 **Q. What is the purpose of your supplemental testimony?**

10 A. Pursuant to Administrative Law Judge (ALJ) Larsen’s February 6, 2026 Email Ruling
11 Modifying Schedule for Track 3 (Track 3 Ruling), this supplemental testimony and the
12 associated workpapers present SDG&E’s updates to my direct and rebuttal testimony describing
13 costs incurred to implement SDG&E’s 2023 WMP initiatives to reflect modifications consistent
14 with guidance and requirements reflected in the Track 2 decision.¹ This supplemental testimony
15 and associated workpapers contain two primary updates.

16 First, Consistent with the Track 2 Decision,² SDG&E reviewed its Track 3 request and
17 removed all costs related to projects and programs placed in service and recorded to SDG&E’s
18 Wildfire Mitigation Plan Memorandum Accounts after December 31, 2023. Appendix A to this
19 testimony presents the direct costs associated with SDG&E’s updated Track 3 request, which
20 reflects the removal of all costs related to projects and programs in-serviced after December 31,

¹ Decision (D.) 26-01-021.

² *Id.* at 189, Ordering Paragraph 11. As further discussed in the testimony of Mr. Guidi, SDG&E intends to address the reasonableness of any incremental 2024-2028 costs, to the extent required, through its upcoming Test Year 2028 GRC or a separate application.

1 2023 and/or any trailing costs associated with project in-serviced in 2023 from the request. Jack
2 Guidi's supplemental testimony (Ex. SDG&E-T3-WMPMA-09) contains SDG&E's updated
3 revenue requirement request.

4 Appendix B presents updated Risk Spend Efficiencies (RSEs) associated with SDG&E's
5 2023 WMP initiatives. The workpapers associated with this testimony present the updated costs
6 and RSEs for each initiative resulting from the removal of costs referenced above, along with
7 updated units, additional cost breakdowns, and expanded narratives in a standard, consistent
8 format.

9 Second, consistent with the Track 2 Decision³ and the Track 3 Ruling,⁴ my supplemental
10 workpapers and testimony provide additional information regarding project-specific costs; full-
11 time equivalent calculations and labor costs; and additional breakdowns of capital and operations
12 and maintenance costs for projects. SDG&E also provides additional details regarding project
13 alternatives considered, cost-efficiencies, and coordination with other programs.

14 **Q. Does this conclude your testimony?**

15 A. Yes.

³ *Id.* at 111 (placing SDG&E "on notice" of the information necessary to assess reasonableness of costs in future cost recovery reasonableness reviews), *id.* at 173-174 ("Capital expenditures require more information to support categorizing costs compared to O&M. O&M expenses that may be similar to existing work also require utilities to provide more information to establish incrementality by demonstrating whether the utility hired additional employees, or used existing resources and replaced them with additional labor.").

⁴ Track 3 Ruling at 6, ("The ALJ finds that it would be reasonable to update the testimony on 2023 costs following the Track 2 decision.").

Appendix A

2024 GRC Track 3 WMP Initiative Cost Breakdown (direct dollars, in thousands)

WMP Initiative	Actual Capital	Actual O&M	Authorized Capital	Authorized O&M	Differential Capital	Differential O&M
Summarized Risk Map (WMP.442)	-	4,057	-	-	-	4,057
Wildfire-Related Data and Algorithms (WMP.521)	-	1,760	-	532	-	1,228
Allocation Methodology Development and Application (WMP.523)	1,161	5,632	-	1,383	1,161	4,249
Wildfire Mitigation Strategy Development	1,161	11,449	-	1,915	1,161	9,534
Covered Conductor Installation (WMP.455)	25,618	3,372	-	-	25,618	3,372
Strategic Undergrounding (WMP.473)	65,873	429	-	-	65,873	429
Distribution Underbuild (WMP.545)	7,072	0	537	-	6,535	0
Distribution Overhead System Hardening (WMP.475)	3,166	1,094	59,561	5,250	(56,395)	(4,156)
Microgrids (WMP.462)	1,350	1,241	-	-	1,350	1,241
Advanced Protection (WMP.463)	3,851	232	11,494	-	(7,643)	232
Early Fault Detection (WMP.1195)	867	4	-	-	867	4
Distribution Communications Reliability Improvements (WMP.549)	42,186	910	14,349	-	27,837	910
Avian Protection Program (WMP.972)	1,484	10	1,034	-	450	10
Strategic Pole Replacement Program (WMP.1189)	59	0	-	-	59	0
Wireless Fault Indicators (WMP.449)	11	-	1,877	-	(1,866)	-
PSPS Sectionalizing Enhancement Program (WMP.461)	1,943	-	-	-	1,943	-
Standby Power Program (WMP.468)	-	12,712	-	-	-	12,712
Generator Grant Program (WMP.466)	-	5,465	-	-	-	5,465
Generator Assistance Program (WMP.467)	-	282	-	-	-	282
Distribution Overhead Detailed Inspections (WMP.478)	-	374	-	13,379	-	(13,005)
Transmission Overhead Detailed Inspections - Distribution Underbuild (WMP.479)	-	-	-	-	-	-
Distribution Infrared Inspections (WMP.481)	-	330	-	-	-	330
Distribution Wood Pole Intrusive (WMP.483)	-	108	-	-	-	108
Drone Assessments - (WMP.552, Tracks 2 and 3)	96,555	190,747	-	-	96,555	190,747
Distribution Overhead Patrol Inspections (WMP.488)	-	331	-	-	-	331
Capacitor Maintenance and Replacement Program (SCADA) (WMP.453)	1,256	-	1,880	-	(624)	-
Expulsion Fuse Replacement Program (WMP.459)	39	-	-	-	39	-
Hotline Clamp Replacement Program (WMP.464)	0	1,662	-	-	0	1,662
Lightning Arrestor Removal and Replacement (WMP.550)	2,054	86	-	-	2,054	86
Cleveland National Forest (CNF Distribution Overhead) (WMP.1017)	1,362	658	13,470	-	(12,108)	658
LiDAR inspections of Distribution Electric Lines and Equipment (WMP.484)	-	873	-	-	-	873
Centralized Repository for Data (WMP.519)	6,905	-	-	-	6,905	-
AM&I Repairs (WMP.478, WMP.479, WMP.483, WMP.488, WMP.551)	10,837	454	12,325	-	(1,488)	454
Grid Design, Operations, and Maintenance	272,490	221,375	116,527	18,629	155,963	202,746

2024 GRC Track 3 WMP Initiative Cost Breakdown (direct dollars, in thousands)

WMP Initiative	Actual Capital	Actual O&M	Authorized Capital	Authorized O&M	Differential Capital	Differential O&M
Fuels Management (WMP.497)	-	4,071	-	-	-	4,071
Pole Clearing (Brushing) (WMP.512)	-	8,045	-	4,374	-	3,671
Tree Planting - Right Tree Right Place (WMP.1325)	-	873	-	-	-	873
Vegetation Management and Inspections	-	12,989	-	4,374	-	8,615
Weather Stations and NDVI Cameras (WMP.447)	6	4,459	583	2,395	(577)	2,064
Air Quality Management Program (WMP.970)	82	66	-	-	82	66
Fire Potential Index (WMP.450)	1,330	-	-	-	1,330	-
High-Performance Computing Infrastructure (WMP.541)	10	-	-	-	10	-
Situational Awareness and Forecasting	1,429	4,525	583	2,395	846	2,130
Public Emergency Communications Strategy (WMP.563)	10,408	10,397	-	290	10,408	10,107
Aviation (WMP.557)	11,452	7,397	-	7,389	11,452	8
Suppression Resources and Services (WMP.514)	-	4,641	-	2,688	-	1,953
Emergency Preparedness Plan (WMP.1008)	7	19,834	721	2,043	(714)	17,791
Emergency Preparedness	21,867	42,268	721	12,410	21,146	29,858
Community Engagement (WMP.1337)	-	448	-	-	-	448
Community Outreach and Engagement	-	448	-	-	-	448
Total	296,946	293,054	117,831	39,723	179,115	253,331

Appendix B

2024 GRC Track 3 WMP Initiative Risk Spend Efficiencies (RSE)

Category	HFTD	2023 Actual Units	Ignitions Avoided	Risk Reduction	Risk Reduction (%)	RSE (per million)
Covered Conductor Installation (WMP.455)	Tier 3	39.2	0.065	101.23	1.04%	102.13
	Tier 2	10.4	0.014	13.24	0.24%	50.33
	Non-HFTD / WUI	-	---	---	---	---
Strategic Undergrounding (WMP.473)	Tier 3	41.0	0.103	527.76	4.25%	206.43
	Tier 2	5.0	0.01	43.51	0.65%	139.56
	Non-HFTD / WUI	-	---	---	---	---
Distribution Underbuild (WMP.545)	Tier 3	2.8	0.0006	0.88	0.01%	7.90
	Tier 2	7.8	0.009	8.57	0.15%	28.02
	Non-HFTD / WUI	-	---	---	---	---
Distribution Overhead System Hardening (WMP.475)	Tier 3	1.8	0.00023	0.36	0.00%	2.45
	Tier 2	0.5	0.00036	0.34	0.01%	8.87
	Non-HFTD / WUI	-	---	---	---	---
Advanced Protection (WMP.463)	Tier 3	4.0	0.054	84.72	0.87%	479.63
	Tier 2	-	0	-	0.00%	-
	Non - HFTD / WUI	-	---	---	---	---
Early Fault Detection (WMP.1195)	Tier 3	12.0	0.062	97.23	1.00%	6,450.48
	Tier 2	12.0	0.031	29.83	0.54%	1,978.98
	Non-HFTD / WUI	6.0	---	---	---	---
Avian Protection Program (WMP.972)	Tier 3	171.0	0.003	4.86	0.05%	364.31
	Tier 2	434.0	0.005	4.77	0.09%	140.74
	Non-HFTD / WUI	52.0	---	---	---	---
Strategic Pole Replacement Program (WMP.1189)	Tier 3	-	0	0	0.00%	-
	Tier 2	-	0	0	0.00%	-
	Non-HFTD / WUI	1.0	---	---	---	---
Wireless Fault Indicators (WMP.449)	Tier 3	-	0	0	0.00%	-
	Tier 2	-	0	0	0.00%	-
	Non-HFTD / WUI	9.0	---	---	---	---

2024 GRC Track 3 WMP Initiative Risk Spend Efficiencies (RSE)

Category	HFTD	2023 Actual Units	Ignitions Avoided	Risk Reduction	Risk Reduction (%)	RSE (per million)
PSPS Sectionalizing Enhancement Program (WMP.461)	Tier 3	2.0	0	412.1	15.07%	20,510.36
	Tier 2	10.0	0	404.23	34.48%	4,023.75
	Non-HFTD / WUI	1.0	---	---	---	---
Standby Power Program (WMP.468)	Tier 3	262.0	0	349.7	12.78%	453.75
	Tier 2	100.0	0	126.71	10.81%	430.77
	Non-HFTD / WUI	-	---	---	---	---
Generator Grant Program (WMP.466)	Tier 3	395.0	0	118.55	4.33%	377.64
	Tier 2	410.0	0	23.85	2.03%	72.98
	Non-HFTD / WUI	-	---	---	---	---
Generator Assistance Program (WMP.467)	Tier 3	140.0	0	27.32	1.00%	25.33
	Tier 2	110.0	0	4.16	0.36%	10.12
	Non-HFTD / WUI	-	---	---	---	---
Distribution Overhead Detailed Inspections (WMP.478)	Tier 3	4,001.0	0.171	267.4	2.76%	2,039.39
	Tier 2	7,754.0	0.096	91.98	1.66%	361.98
	Non-HFTD / WUI	-	---	---	---	---
Distribution Infrared Inspections (WMP.481)	Tier 3	6,215.0	0	-	0.00%	-
	Tier 2	5,685.0	0.102	97.44	1.76%	600.03
	Non-HFTD / WUI	-	---	---	---	---
Distribution Wood Pole Intrusive (WMP.483)	Tier 3	153.0	0	0.18	0.00%	11.08
	Tier 2	885.0	0.001	0.58	0.01%	6.16
	Non-HFTD / WUI	-	---	---	---	---
Drone Assessments (WMP.552)	Tier 3	5,408.0	0.345	539.88	5.57%	18.39
	Tier 2	8,391.0	3.568	3407.82	61.52%	74.79
	Non-HFTD / WUI	1,435.0	---	---	---	---
Distribution Overhead Patrol Inspections (WMP.488)	Tier 3	39,212.0	0.018	848.01	8.75%	5,446.16
	Tier 2	46,635.0	0.035	540.66	9.76%	2,919.61
	Non-HFTD / WUI	-	---	---	---	---

2024 GRC Track 3 WMP Initiative Risk Spend Efficiencies (RSE)

Category	HFTD	2023 Actual Units	Ignitions Avoided	Risk Reduction	Risk Reduction (%)	RSE (per million)
Capacitor Maintenance and Replacement Program (SCADA) (WMP.453)	Tier 3	2.0	0.0003	0.44	0.00%	58.24
	Tier 2	4.0	0.0013	1.27	0.02%	83.69
	Non-HFTD / WUI	13.0	---	---	---	---
Expulsion Fuse Replacement Program (WMP.459)	Tier 3	-	0	-	0.00%	-
	Tier 2	36.0	0.012	11.63	0.21%	5,190.99
	Non-HFTD / WUI	-	---	---	---	---
Hotline Clamp Replacement Program (WMP.464)	Tier 3	107.0	0	3.89	0.04%	368.31
	Tier 2	631.0	0.001	7.65	0.14%	122.80
	Non-HFTD / WUI	229.0	---	---	---	---
Lightning Arrestor Removal and Replacement (WMP.550)	Tier 3	1,780.0	0.064	100.2	0.0103	1,007.30
	Tier 2	401.0	0.008	7.45	0.0013	332.63
	Non-HFTD / WUI	18.0	---	---	---	---
Fuels Management (WMP.497)	Tier 3	308.0	0.002	73.53	0.76%	29.26
	Tier 2	206.0	0.001	24.67	0.45%	14.68
	Non-HFTD / WUI	-	---	---	---	---
Pole Clearing (Brushing) (WMP.512)	Tier 3	15,754.0	0.029	276.28	2.85%	81.88
	Tier 2	16,074.0	0.037	202.57	3.66%	58.84
	Non-HFTD / WUI	3,430.0	---	---	---	---