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VIA E-FILING

Docket #2026-2028-Base-WMPs

Tony Marino, Deputy Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: San Diego Gas & Electric Company's Revised 2026-2028 Base Wildfire Mitigation Plan in Response to Energy Safety Notice on Errata

Dear Deputy Director Marino:

Enclosed please find San Diego Gas & Electric's ("SDG&E") revised 2026-2028 Base Wildfire Mitigation Plan R2 ("WMP")¹ as directed by the Office of Energy Infrastructure Safety's ("Energy Safety") Notice on Errata for the San Diego Gas and Electric Company 2026-2028 Base Wildfire Mitigation Plan ("Notice") issued on September 16, 2025.² As permitted by Energy Safety, SDG&E also made additional non-substantive corrections as shown in the second table below.

SDG&E appreciates Energy Safety's thorough review of SDG&E's WMP and the opportunity to submit a revised version.

Respectfully submitted,

/s/ Laura M. Fulton
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Attorney for
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¹ SDG&E's revised 2026-2028 Base WMP R2 is also available at SDG&E's website: <https://www.sdge.com/2026-2028-wildfire-mitigation-plan>

² Letter from Office of Energy Infrastructure Electrical Safety Policy Division Program Manager Nicole Dunlap to Brian D'Agostino, *Notice on Errata for the San Diego Gas and Electric Company 2026-2028 Base Wildfire Mitigation Plan*, September 16, 2025. Available at <https://efiling.energysafety.ca.gov/Search.aspx?docket=2026-2028-Base-WMPs>

Table of Substantive and Non-substantive Errata Identified in Energy Safety's Notice

Section and WMP Page Number	Energy Safety Correction or Clarification	SDG&E Revisions in Response to Correction or Clarification
Section 6 Wildfire Mitigation Strategy, Page N/A	<p>SDG&E must clarify in its WMP how it prioritizes its grid hardening projects in its top risk circuit segments using its older risk models. SDG&E must include the explanations and examples given in response to Data Requests and in Reply Comments to support its mitigation selection process in light of the TY2024 GRC Decision. These explanations must include, but are not limited to:</p> <ul style="list-style-type: none"> • A list of 10 of the 20 top risk circuits that have already had grid hardening implemented, • Updated versions of OEIS Tables 5-5, 6-1, and 6-4 with the top 20 percent riskiest circuit segments based on overall utility risk scores, • Updated versions of OEIS Tables 5-5, 6-1, and 6-4 using the WiNGS 2.0 and 3.0 risk ranking of top risk circuit segments compared to the WiNGS 4.0 risk ranking, • The Circuit 1030 example provided in response to OEIS Data Request 16, and • Discussion of PEDS coverage of its top riskiest circuit segments in Section 8.2.8.1 and Section 8.7.1 (as necessary), as provided in response to OEIS Data Request 16. 	<ul style="list-style-type: none"> • Added a column to OEIS Table 6-4 to indicate where grid hardening is already implemented. • Revised OEIS Tables 5-5 and 6-4 to show top 20 percent circuit/circuit segments based on overall utility risk scores. Appendix F for OEIS Table 6-4 also includes the top 20% top risk circuit segments based on count. • Per additional guidance from OEIS, presentation of WiNGS 2.0, 3.0, and 4.0 are provided in OEIS Table 6-4 and related OEIS Table in Appendix F. • Revised Section 6.2.1.3 to include Circuit 1030 example. • Revised OEIS Tables 8-7 and 8-8 with an "*" to indicate PEDS coverage of the top riskiest circuits segments. In Section 6.1.3.3.2, 6.2.2, and 8.7.1, added sentence

Section and WMP Page Number	Energy Safety Correction or Clarification	SDG&E Revisions in Response to Correction or Clarification
		clarifying that SRP is deployed on every circuit in the HFTD including the highest-risk circuits.
Section 8.2.1.3 Impact of the Activity on Wildfire Risk, Page 149	SDG&E must update the mitigation effectiveness for combined covered conductors and ensure it is consistent with the value reported in the OEIS Table 6-3 and other sections of the 2026-2028 Base WMP (e.g. Section 6.1.3.3.5 Measuring Effectiveness of Mitigation Initiatives).	<ul style="list-style-type: none"> Revised OEIS Table 6-3 for columns “Activity Effectiveness – Overall” and “Activity Effectiveness – Wildfire” for Combined Covered Conductor (WMP.455) from 62% to 61.71% Revised Combined Covered Conductor Effectiveness from 46% to 61.71% in Section 8.2.1.3.
Section 9.1.2 Quantitative Targets, Page 235	SDG&E must update its calculations for the columns “% HFTD Covered in 2026” and “% Risk Reduction” reflecting the correct approach.	<ul style="list-style-type: none"> Revised OEIS Table 6-3 and OEIS Table 9-2 to reflect 100% coverage of the HFTD. “% Risk Reduction” values are not impacted.
Vegetation Management and Inspections, Page N/A	SDG&E must update the names of the vegetation management procedures documents to be consistent between its WMP and its website.	<ul style="list-style-type: none"> Revised names of vegetation management procedures to be consistent with the SDGE website under “Documents Cited and Referenced in the 2026-2028 WMP”;

Table of SDG&E's Additional Non-Substantive Errata

Item	Location of Issue and WMP Page Number (R1)	Nature and Reason for Change
1	OEIS Table 6-1; p. 89	Corrected typo in column heading from “Overall Utility” to “Overall Utility Risk”.
2	SDGE Table 6-5; p. 100	Corrected typo in the Service Territory Risk Reduction column for Strategic Undergrounding from 4.17% to 4.05%, for consistency throughout the Base WMP.
3	OEIS Table 8-1; p. 145-148	Corrected typo WM.552 to WMP.552; added commas to numbers in table for improved readability.
4	Section 8.4.1; p. 196	Corrected typo from "transition lines" to be "transmission lines".
5	Section 8.5.1; OEIS Table 8-4; p. 203	Corrected typo in population size columns for Risk-Informed Drone Inspections (WMP.552) from 6,500 to 9,000 to be consistent with OEIS Table 8-1.
6	Appendix G	Clarified the name of the file for Appendix G posted on the SDG&E website.