



Shivani Sidhar  
Regulatory Case Manager  
San Diego Gas and Electric Company  
8330 Century Park Court  
San Diego, CA 92123-1530

April 28, 2016

**Sent Via Sempra EDT and FedEx**

A.15-09-010

Mr. Nathaniel Skinner  
Office of Ratepayer Advocates  
505 Van Ness Avenue, Room 4108  
San Francisco, CA 94102

**Re: SDG&E Response to ORA Data Request 03 - Wildfire Expense Memorandum Account Application**

Dear Mr. Skinner:

Attached please find SDG&E's response to ORA Data Request 03 (ORA-SDG&E-A.15-09-010-03), dated April 13, 2016. SDG&E's response includes general objections, narrative responses where applicable, and associated attachments.

If you have any questions or require additional information, please feel free to contact me by phone at (858) 637-7914 or e-mail: [SSidhar@semprautilities.com](mailto:SSidhar@semprautilities.com).

Sincerely,

**Signed**

Shivani Sidhar  
Regulatory Case Manager

Enclosures

cc: Chris Lyons – SDG&E  
Stacie Atkinson – SDG&E  
Nils Stannik - ORA  
Edward Moldavsky - ORA



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**SDG&E WEMA PROCEEDING - A.15-09-010**  
**SDG&E RESPONSE**  
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**I. GENERAL OBJECTIONS**

1. SDG&E objects generally to each request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, statutory mediation confidentiality (see Cal. Evid. Code §§ 1115-28) or any other applicable privilege or evidentiary doctrine. No information protected by such privileges will be knowingly disclosed.
2. SDG&E objects generally to each request that is overly broad and unduly burdensome. As part of this objection, SDG&E objects to discovery requests that seek “all documents” or “each and every document” and similarly worded requests on the grounds that such requests are unreasonably cumulative and duplicative, fail to identify with specificity the information or material sought, and create an unreasonable burden compared to the likelihood of such requests leading to the discovery of admissible evidence. Notwithstanding this objection, SDG&E will produce all relevant, non-privileged information not otherwise objected to that it is able to locate after reasonable inquiry.
3. SDG&E objects generally to each request to the extent that the request is vague, unintelligible, or fails to identify with sufficient particularity the information or documents requested and, thus, is not susceptible to response at this time.
4. SDG&E objects generally to each request that: (1) asks for a legal conclusion to be drawn or legal research to be conducted on the grounds that such requests are not designed to elicit facts and, thus, violate the principles underlying discovery; (2) requires SDG&E to do legal research or perform additional analyses to respond to the request; or (3) seeks access to counsel’s legal research, analyses or theories.
5. SDG&E objects generally to each request to the extent it seeks information or documents that are not reasonably calculated to lead to the discovery of admissible evidence.
6. SDG&E objects generally to each request to the extent that it is unreasonably duplicative or cumulative of other requests.
7. SDG&E objects generally to each request to the extent that it would require SDG&E to search its files for matters of public record such as filings, testimony, transcripts, decisions, orders, reports or other information, whether available in the public domain or through FERC or CPUC sources.
8. SDG&E objects generally to each request to the extent that it seeks information or documents that are not in the possession, custody or control of SDG&E.

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9. SDG&E objects generally to each request to the extent that the request would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

10. SDG&E objects generally to each request that calls for information that contains trade secrets, is privileged or otherwise entitled to confidential protection by reference to statutory protection. SDG&E objects to providing such information absent an appropriate protective order. With respect to the Office of Ratepayer Advocates, however, SDG&E will produce such information subject to the requirements of Public Utilities Code Section 583 and General Order 66-C.

**II. EXPRESS RESERVATIONS**

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.

2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.

3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.

4. These responses are made solely for the purpose of this proceeding (A.15-09-010) and for no other purpose.

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**III. OBJECTIONS AND RESPONSES TO REQUESTS**

**Request 1:**

On page 6, lines 11-14 of Mr. Geier's testimony, SDG&E states:

*"We have seen these conditions worsen in recent years as a result of the effects of the drought and climate change. Approximately two-thirds of SDG&E's service territory now falls within what SDG&E has determined to be a fire threat zone in connection with mapping activities we have undertaken."*

- a. Has SDG&E quantified or otherwise studied to what extent the drought and/or climate change has worsened fire risk? If so, please provide the quantification, study, or similar document.
- b. Please provide the historical proportion (on at least an annual basis) of SDG&E's service territory SDG&E determined to be a fire threat zone since the year 1990. If data is not available back to 1990, please provide all available historical data.

**Objection:** SDG&E objects to this request on the grounds set forth in General Objection 9. Subject to this objection, SDG&E provides the following response.

**Response:**

- a. SDG&E has confirmed an increase in the frequency of high fire risk days through research conducted as part of the Santa Ana Wildfire Threat Index (see "Attachment for Question 1a\_SAWTI"), which is further discussed in the Prepared Direct Testimony of Mr. Steve Vanderburg. Additionally, these findings were included in the Wildfire section of the attached Vulnerability Assessment report submitted to the Department of Energy as a deliverable for its Partnership for Energy Sector Climate Resilience (see "Attachment for Question 1a\_SDGE Potential Climate Change Impacts").
- b. The most recent boundary of the SDG&E Fire Threat Zone (FTZ) constitutes 62.6 % of SDG&E's service territory. In the only previous version of the FTZ, it constituted 62.4% of SDG&E's service territory. This small increase came about after a review of the FTZ boundary that SDG&E undertook following the May 2014 wildfires in San Diego County to determine if there were logical additions that could be made to the FTZ. The SDG&E FTZ was established in 2010 in response to the Fire Safety OIR (R.08-11-005). Prior to establishment of the FTZ, SDG&E used a boundary called the "Wildland Fire Area," which was comprised of lands that were State and Federal Responsibility areas (under CALFIRE and US Forest Service jurisdiction, respectively), for its fire preparedness procedures.

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SDG&E does not have the GIS data necessary to calculate the exact percentage of its service territory that fell within the boundary of the Wildland Fire Area.

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**Request 2:**

Page 28 of SDG&E’s Fire Prevention Plan (included as Appendix 2 to Mr. Geier’s testimony) shows an “FPI Weather Component” table with various wind speeds. It is ORA’s understanding that the values for the 36 dewpoint/wind combinations are a contributing component to SDG&E’s Fire Potential Index (FPI).

- a. Does any component of the FPI take into account non-sustained wind speeds (i.e. gusting or similar)?
- b. Has SDG&E analyzed how often each of the wind speed ranges shown in the FPI Weather Component table occur in its service territory annually? If so, please provide frequency data, studies, or similar documents.

**Response:**

- a. The FPI does not take into account wind gusts.
- b. SDG&E has analyzed the daily FPI back to 2002, which incorporates wind speed as one of its components. On average, there are 243 Normal FPI days, 113 Elevated FPI days, and 9 Extreme FPI days per year in the SDG&E service territory (see “Attachment for Question 2a\_Copy of Historic\_FPI\_2002-2016”). Regarding the wind speed portion of the weather component of the FPI, see the following table for the frequency of occurrence in the SDG&E service territory.

FPI Wind Speed Ranges	Average number of days per year
0 to 4	0
5 to 9	2
10 to 14	67
15 to 19	193
20 to 24	69
25 or greater	34

Please note: this only examines daily maximum sustained wind speeds at Federally-owned ASOS weather stations and does not take into account wind measurements from Federally-owned RAWs or SDG&E weather stations. It was not the intent of the FPI to create a wind climatology (*i.e.*, the known wind patterns) of the SDG&E service territory.

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**Request 3:**

On lines 4-16 of page 7 of Mr. Akau's testimony, SDG&E describes the use of the Master Schedule in its management of trees and poles under the Vegetation Management Program, stating:

*“Within an annual cycle, the pre-inspection is completed within 30 days; the quality assurance audit of the pre-inspection is completed within the first month following the pre-inspection; tree trimming and removal begins two months after the start of pre-inspection, and the contractor has 60 days to complete all assigned work and 5 additional days to certify completion; and the quality assurance audit of the tree trimming and removal is completed within 30 days from that completion and certification – a continuous cycle.”*

- a. What event or timeline triggers the pre-inspection (for example, 365 days since a Vegetation Management Area was last assessed)?
- b. Does SDG&E's description of the Quality Assurance (QA) audit mean that between 30 days (pre-inspection completed on the 31st of a month, so QA audit must be completed within the subsequent calendar month) and 61 days (pre-inspection completed on the 1st of the month, so QA audit must be completed by the end of the following calendar month) can elapse between pre-inspection completion and audit completion, depending on what date the pre-inspection is completed? If not, please describe.
- c. Does the timing of the tree trimming work remain the same if the QA audit finds issues in the pre-inspection? If not, please describe how the timeline changes.
- d. Must the contractor certify completion of work within 65 days of starting work or within 5 days of completing work? For example, if work is completed in 15 days, must work be certified within 20 total days or within 65 total days?

**Response:**

- a. The Master Schedule was designed to manage SDG&E's 133 Vegetation Management Areas (VMA) that comprise the entire service territory. Each of the 133 VMA's are assigned a specific month within the calendar year for the pre-inspection activity (repeated the same month each year, 365 days or fewer). Approximately 10-12 individual VMA's are pre-inspected within each month of the calendar year.
- b. Yes.



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- c. If QA finds issues in the VMA during the Pre-inspection audit, the auditor will make the necessary corrections and provide the final results to SDG&E. Pre-inspection audits do not hold up the release of the tree trimming work.
  
- d. SDG&E's contractors are required to certify the completion of work within 65 days of starting work but are free to certify the completion of work earlier than that.

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**Request 4:**

“Table 1 – Historical Tree-Caused Outages” on page 14 of Mr. Akau’s testimony shows appears to show numerous significant year-over-year changes in tree-caused outages, including, for example a reduction from 446 outages in 1997 to 280 (-37%) in 1998 to 58 (-79%) in 2009.

Please provide dates and descriptions of any years between 1995 and 2015 in which:

- Extreme or unusual weather caused significant numbers of tree-caused outages
- Specific components of SDG&E’s Vegetation Management Program (VMP) were put into place or began to be accounted for
- Specific components of SDG&E’s VMP changed or were ended, discontinued, or paused
- Significant resources were added to the VMP (or a component thereof)
- Significant resources were moved from one VMP program/section to another
- SDG&E changed its definition or categorization of “tree-caused outage” (or related, similar terms)
- SDG&E changed its method of counting “tree-caused outages” or similar statistics

**Objection:** SDG&E objects to this request on the grounds set forth in General Objections 3 and 9. Subject to this objection, SDG&E provides the following response.

**Response:**

- Extreme or unusual weather caused significant numbers of tree-caused outages

Weather contributed to an increase in the total number of tree-related outages in 2004 and 2010. During the winter season of those years a number of storm events (with associated strong winds and saturated soils) caused an increase in tree branch breakouts and whole tree failures which impacted the overhead electric facilities.

- Specific components of SDG&E’s Vegetation Management Program (VMP) were put into place or began to be accounted for

In 1997, General Order 95, Rule 35 established minimum clearance requirements between power lines and vegetation, and SDG&E initiated an annual Vegetation Management cycle of pre-inspection and tree trimming activities to identify and abate tree encroachments into electrical facilities and to comply with the new regulatory requirements. At this time, SDG&E increased post-trim clearances and hazard tree inspection scope to mitigate impacts to overhead facilities. As a result there was a significant reduction in the number of tree-related outages in 1998 and 1999

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compared to 1997. SDG&E reported its compliance with the increased clearance requirements to the CPUC in 1999. As more information was gathered regarding tree growth and tree failures, SDG&E made additional adjustments to post pruning clearances for fast and very fast growing tree species, as well as inspection of palms further away from the overhead lines; 25 feet to as much as 65 feet away depending on the height of the palm. Additionally, SDG&E began an aggressive removal of palms and removal of overhanging branches since 2001 and continues to do so today.

In April 2003, SDG&E supported the Governor's State of Emergency Proclamation (CPUC Resolution E-3824) to remove dead, dying and diseased trees, as part of the "Bark Beetle project," which was completed in early 2005.

In 2009, SDG&E began its participation in the OII workshops and worked closely with contractors to develop an annual hazard tree training program with its workforce.

In 2010, SDG&E implemented a Highest Risk Fire Area map and the vegetation management team began an off-cycle hazard tree patrol to mitigate dead or declining tree concerns arising since a tree's last inspection, before September 1.

In 2012, SDG&E implemented a "Century Plant Patrol" to remove the flowering bloom during its Spring and Summer growing period. Lastly, SDG&E began an effort to apply tree growth regulator to trees that are very fast growing and where customers will not permit heavier pruning.

Today, SDG&E has a strong tree removal program that has resulted in minimizing the number of tree related outages annually.

- Specific components of SDG&E's VMP changed or were ended, discontinued, or paused

Following the implementation of General Order 95, Rule 35 and the subsequent increase in SDG&E VMP scope of work and activities, there have been no singular components that have significantly impacted the number of tree-related outages.

- Significant resources were added to the VMP (or a component thereof)

Following the implementation of General Order 95, Rule 35, SDG&E increased its contractor workforce of pre-inspectors, auditors, and tree trimmers to meet the demand of the annual schedule activities and scope of work.

- Significant resources were moved from one VMP program/section to another

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The change in the number of tree-related outages over time has not been caused by SDG&E moving or allocating significant resources (budgetary or labor) from the VMP program to or from another.

- SDG&E changed its definition or categorization of “tree-caused outage” (or related, similar terms)

SDG&E has not changed its definition of “tree-caused outages” over time.

- SDG&E changed its method of counting “tree-caused outages” or similar statistics.

SDG&E has not changed its methodology of counting “tree-caused outages” over time.

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**Request 5:**

How are tree identifying numbers assigned? In the case of tree FF1090, what do the components “FF” and “1090” stand for, mean, or otherwise indicate?

**Response:**

Each inventory tree is assigned unique alpha-numeric identification. In the example of tree record FF1090, the alpha characters, “FF” identify the Mobil Data Terminal (MDT), which is the portable computer used in recording the tree information. The numeric “1090” is the sequential numbering assigned by the system software to create the unique tree record. This number increases by one digit as new inventory trees are created in the system and prevents duplication of records.

The record remains in service and updated as long as the tree meets the inventory criteria. If the tree no longer meets the criteria for inventory or is removed (cut down entirely), the record is de-activated and the history retained.

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**Request 6:**

On page 11, lines 22-27 of Mr. Walters's testimony, SDG&E states (regarding Communications Infrastructure Provider-related General Order 165 infractions):

*Q. Did SDG&E take any action when it found such infractions?*

*A. Yes. SDG&E routinely provided a detailed notice to CIPs of their infractions, even though not required to do so by GO 165 prior to the 2007 wildfires. The notices detailed the affected pole numbers and addresses or location identifiers and the problem requiring remediation. These notices typically also included photographs of the problem. The preparation of these notices was quite labor intensive.*

- a. Did SDG&E send a notice to Cox Communications regarding Cox's lashing wire infraction between poles P196387 and P196394 prior to the Guejito Fire? If so, please provide the notice, notice date, and any supplemental documents.
- b. Please provide the procedures, protocols, or standards by which SDG&E provided "a detailed notice to CIPs of their infractions" prior to the 2007 wildfires.

**Response:**

- a. As discussed in the direct testimony of Mr. Walters (pages 14-15) and Mr. Weim, (pages 10-11), SDG&E had inspected these facilities but had no notice of the issues that are alleged to have caused the Guejito Fire. Thus, no notice was sent to Cox Communications regarding this lashing wire.
- b. See attachments titled "Attachment for Question 6b\_Deffering CMP Facility and Equipment Repairs\_Mar2003"; "Attachment for Question 6b\_Example of a GO95 Infraction Notification"; and "Attachment for Question 6b\_Visual Inspection of Poles\_Feb2006". See also Appendix 3 to Mr. Walters' direct testimony.

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**Request 7:**

On page 7, lines 4-5 of Mr. Weim's testimony, SDG&E states,

*“Second, the accuracy of our [Corrective Maintenance] program is constantly verified and maintained through regular internal audits.”*

Are there now or have there ever been any equivalent external audits performed on SDG&E's Corrective Maintenance Program? If so, please describe.

**Objection:** SDG&E objects to this request on the grounds set forth in General Objections 3 and 10. Subject to the foregoing objection, SDG&E responds as follows.

**Response:**

The only external party that has audited the CMP is the Safety and Enforcement Division (SED) of the CPUC. It has historically performed several audits per year at SDG&E.

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**Request 8:**

On page 6, lines 15-16 of Mr. Weim's testimony, SDG&E states "*For problems posing immediate safety concerns, the repairs are normally completed that same day.*"

- a. Under what conditions would immediate safety concerns not be completed the same day?
- b. Please provide a historical annual count (since 1990) of immediate safety concern repairs that were not addressed the same day there were discovered. If data is not available back to 1990, please provide all available historical data.

**Objection:** SDG&E objects to this request on the grounds set forth in General Objections 2, 3 and 9. Subject to the foregoing objection, SDG&E responds as follows.

- a. Immediate safety concerns are almost always completed the same day, and in the rare instances where repairs are not made the same day, SDG&E takes steps to make conditions safe until the permanent repairs can be made. There are a few reasons that immediate safety concerns might not be completed on the same day found. The first reason is timing. If a condition is found at the end of a day, repairs could carry over to the following day. In addition, weather could factor into the repair time. Typically, when these types of hazards are identified, the party or parties that identify the hazard stand-by until a make-safe crew or repair crew arrives on scene to begin repairs. Another scenario where repairs might not be completed the same day is if, as noted previously, the conditions can be made safe temporarily until permanent repairs can be made, or if the facilities can be de-energized for a short period of time. Many SDG&E circuits have ties with other circuits. Depending on the nature of the hazard, the load on a circuit with a problem can be transferred to another circuit, and the circuit with the hazard can be deenergized, making same day follow-up unnecessary.
- b. SDG&E does not compile data in the manner suggested by this request. There can be a variety of scenarios in which emergency repairs become necessary.



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**Request 9:**

On page 9, lines 14 through 20 of Mr. Weim's testimony, SDG&E states [internal citation removed]:

*“SDG&E has also received the ‘Top Ten Best North American Utilities’ award for smart grid development from Greentech Media, SDG&E was named “Most Intelligent Utility” for three years in a row by Intelligent Utility magazine, and received POWER Magazine’s prestigious ‘2012 Smart Grid Award’ for the nation’s most advanced smart grid. From SDG&E’s perspective, these awards are the result of a comprehensive approach to improving the quality of the electric system through a myriad of activities, including inspection and maintenance.”*

- a. Do any of the above-mentioned awards specifically relate to safety-related programs and activities? If so, please provide appropriate citations, grading criteria, etc.
- b. Do any of the above-mentioned awards specifically relate to inspection and maintenance programs and activities? If so, please provide appropriate citations, grading criteria, etc.
- c. Do any of the above-mentioned awards specifically relate to wildfire preparedness or response? If so, please provide appropriate citations, grading criteria, etc.

**Response:**

- a. The Smart Grid Awards do relate to safety-related activities. Under the Smart Grid portfolio of projects related to the 2012 awards, advanced sectionalizing devices were installed (*e.g.*, Intellirupters), Supervisor Control and Data Acquisition (SCADA) capacitors were installed, wireless fault indicators were installed, advanced relays were installed, weather stations were installed, and sensitive ground fault settings were applied to relays. In addition, an arc detection system was pursued under the Smart Grid portfolio of projects to increase the capability of identifying arcs on the overhead electric system. Unlike the reliability awards SDG&E has received, where the metrics and grading system are known, the details of the Smart Grid award grading system are not known.
- b. The ‘2012 Smart Grid Award’ was awarded to SDG&E for work done in the Smart Grid area. This does include the work SDG&E has done with Condition Based Maintenance (CBM), which is related to substation inspection and maintenance activities. It also includes the deployment of SCADA capacitors. SCADA capacitors allow SDG&E to get real-time performance and diagnostic information. In the past, capacitors were inspected as part of the normal detailed inspection cycle (done as part of the CMP), as well as annual capacitor

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surveys. These “smart” capacitors are an example of how SDG&E has deployed equipment, and continues to deploy equipment, capable of providing real-time operational status. Unlike the reliability awards SDG&E has received, where the metrics and grading system are known, the details of the Smart Grid award grading system are not known.

c. Under the Smart Grid portfolio of projects related to the 2012 award, advanced sectionalizing devices were installed (e.g. Intellirupters), SCADA Capacitors were installed, wireless fault indicators were installed, advanced relays were installed, weather stations were installed and sensitive ground fault settings were applied to relays. In addition, an arc detection system was pursued under the Smart Grid portfolio of projects to increase the capability of identifying arcs on the overhead electric system. Unlike the reliability awards SDG&E has received, where the metrics and grading system are known, the details of the Smart Grid award grading system are not known.

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**Request 10:**

On page 13, line 14 of Mr. Weim's testimony, SDG&E mentions wood-to-steel construction standards as "*further reduc[ing] fire risk on the transmission system.*"

Do wood-to-steel pole conversion programs primarily reduce risk by preventing or reducing the spread of wildfires, preventing or reducing wildfires' ignition, preventing or reducing wildfire effects on the electrical system, or some other factor? Please explain.

**Objection:** SDG&E objects to this request on the grounds set forth in General Objection 5. Subject to this objection, SDG&E provides the following response.

**Response:**

The wood-to-steel conversion projects are designed to reduce the risk of ignitions as well as reduce the impact of wildfires on the overhead electric system. The design standards that were developed for the steel pole construction in fire prone areas include the use of steel poles designed for wind speeds that exceed GO 95 wind loading criteria, the use of high-strength conductors, increased phase separation, and the use of longer insulators. For distribution wood-to-steel construction, steel poles are also designed for higher wind speeds, and high-strength conductors are used, but additional measures are also within the project scope, including, the use of advanced sectionalizing devices and relays for improved monitoring and detection, use of engineered fiberglass crossarms and in some cases the use of insulated spacer cable. The transmission wood-to-steel projects, and now, the distribution Fire Risk Mitigation (FiRM) capital projects, are designed using the advanced PLS-CADD 3-D modeling software, using Light Detection and Ranging (LiDAR) and/or survey quality data.

Attachment for Question 1a\_SAWTI

1     **The Santa Ana Wildfire Threat Index: Methodology and Operational**  
2   **Implementation**

3   Tom Rolinski\* and Scott B. Capps

4   *University of California, Los Angeles, CA, USA*

5   Robert G. Fovell

6   *University of California, Los Angeles, CA, USA*

7   Yang Cao

8   *University of California, Los Angeles, CA, USA*

9   Brian J. D'Agostino

10    *San Diego Gas & Electric, San Diego, CA, USA*

11    Steve Vanderburg

12    *San Diego Gas & Electric, San Diego, CA, USA*

13    \*Corresponding author address: Tom Rolinski, United States Forest Service, 2524 Mulberry St.,  
14    Riverside, CA 92501.

15    E-mail: thomasrolinski@fs.fed.us

## ABSTRACT

16 Santa Ana winds, common to Southern California during the fall through  
17 early spring, exhibit characteristics similar to katabatic winds and originate  
18 from a direction generally ranging from 360°/0° to 100° and is usually ac-  
19 companied by very low humidity. Since fuel conditions tend to be driest from  
20 late September through the middle of November, Santa Ana winds occur-  
21 ring during this time have the greatest potential to produce large, devastating  
22 fires upon ignition. Such catastrophic fires occurred in 1993, 2003, 2007,  
23 and 2008. Because of the destructive nature of such fires, there has been a  
24 growing desire to categorize Santa Ana wind events in much the same way  
25 that tropical cyclones have been categorized. The Santa Ana Wildfire Threat  
26 Index (SAWTI) is an index that categorizes Santa Ana wind events with re-  
27 spect to anticipated fire potential. The latest version of the index has been a  
28 result of a three and a half year collaboration effort between the USDA Forest  
29 Service, the San Diego Gas and Electric utility (SDG&E), and the University  
30 of California, Los Angeles (UCLA). SAWTI uses several meteorological and  
31 fuel moisture variables at 3 km resolution using the Weather Research and  
32 Forecasting (WRF) model to generate the index out to 6 days. In addition to  
33 the index, a 30 year climatology of weather, fuels and the SAWTI has been  
34 developed to help put current and future events into perspective. This paper  
35 outlines the methodology for developing the SAWTI, including a discussion  
36 on the various datasets employed and its operational implementation.

## 37 **1. Introduction**

38 From the fall through early spring, offshore winds, or what are commonly referred to as Santa  
39 Ana winds, occur over Southern California from the coastal mountains westward, from Ventura  
40 County southward to the Mexican border. These synoptically driven wind events vary in frequency,  
41 intensity, and spatial coverage from month to month and from year to year, thus making them  
42 difficult to categorize. Most of these wind events are associated with mild to warm ambient surface  
43 temperatures  $\geq 18^{\circ}\text{C}$  and low surface relative humidity  $\leq 20\%$ . However, during the late fall  
44 and winter months, these events tend to be associated with lower surface temperatures due to  
45 the air mass over the Great Basin originating from higher latitudes and other seasonal effects.  
46 There are a variety of ways to define a Santa Ana event through the analysis of local and synoptic  
47 scale surface pressure and thermal distributions across Southern California (Raphael 2003). We  
48 view these offshore winds from a wildfire potential perspective, taking into consideration both the  
49 fuel characteristics and weather. As we have found, the index discussed herein provides a robust  
50 descriptor of both Santa Ana Winds and the potential for wildfire activity. Used in conjunction  
51 with a Mean Sea Level Pressure (MSLP) map type, this is a powerful method to separate Santa  
52 Ana Wind events from the more typical nocturnal offshore flows that occur throughout the coastal  
53 and valley areas (i.e, land breeze) during the year.

54 From October 21<sup>st</sup> through the 23<sup>rd</sup>, 2007, Santa Ana winds generated multiple large catas-  
55 trophic fires across Southern California (Moritz et al. 2010). Most notable was the Witch Creek  
56 fire in San Diego County, where wind gusts of  $26\text{ m s}^{-1}$  were observed at the Julian weather sta-  
57 tion along with relative humidity values of  $\approx 5\%$ . However, high resolution model simulations at  
58 667 m showed that wind velocities were much higher in unsampled areas (Cao and Fovell 2016).  
59 This event became the catalyst for the development of a comprehensive Santa Ana wildfire poten-

60 tial index to better inform fire agencies, first responders, private industry, and the general public  
61 about the severity of an approaching event. This index could also help augment Fire Weather  
62 Watches and Red Flag Warnings from the National Weather Service by providing value added  
63 information about an impending event.

64 The Predictive Services Unit, functioning out of the Geographic Area Coordination Center  
65 (GACC) in Riverside, California, is comprised of several meteorologists employed by the USDA  
66 Forest Service. In 2009, Predictive Services began working on an index that categorizes Santa Ana  
67 wind events according to the potential for a large fire to occur (Rolinski et al. 2011). This unique  
68 approach addresses the main impact Santa Ana winds can have on the population of Southern  
69 California beyond the causal effects of windy, dry weather. Following on, and improving upon  
70 this work, the Forest Service (through Predictive Services) collaborated during a three and a half  
71 year period with the San Diego Gas and Electric utility (SDG&E) and the University of Califor-  
72 nia, Los Angeles (UCLA) to develop the Santa Ana Wildfire Threat Index (SAWTI). This index  
73 employs a gridded 3 km model to not only assess meteorological conditions, it also incorporates  
74 an estimation of fuel moisture to determine the likelihood of rapid fire growth during Santa Ana  
75 winds.

76 The SAWTI domain covers the coastal, valley, and mountain areas of Southern California from  
77 Point Conception southward to the Mexican border. This area has been divided into 4 zones  
78 based in part on the different offshore flow characteristics that occur across the region (Figure 1).  
79 Zone 4, which covers Santa Barbara County and was the last zone to be included into the index  
80 (thus the reason for the discontinuity within the sequential order of zones going from north to  
81 south), does not typically experience Santa Ana winds in the classic sense. Strong northwest to  
82 north winds in this zone can either precede a Santa Ana wind event or can occur independently  
83 (typically in the summer), which in the latter case are more commonly known as “Sundowners”



84 (Bluer 1998). In both cases, these downsloping winds are common to the south slopes of the Santa  
85 Ynez Mountains, an east-west coastal range which runs parallel to, and a few miles inland from the  
86 shoreline. Although not frequent, significant fire activity associated with these winds in this zone  
87 has occurred in the past which is why this geographic area is now represented in the index. Santa  
88 Ana winds across zones 1 and 2 are primarily a result of offshore surface pressure gradients (locally  
89 and/or synoptically) interacting with the local terrain to produce gap winds through the Soledad  
90 Canyon, the Cajon Pass, and the Banning Pass (Hughes and Hall 2010; Cao and Fovell 2016).  
91 These winds also tend to precede the Santa Ana winds that occur across San Diego County by 12  
92 to 24 hours. Across zone 3, offshore winds take on a more “downslope windstorm” characteristic  
93 driven largely by the tropospheric stability (Cao and Fovell 2016). Other factors that led to the  
94 division of zones were changes in terrain, National Weather Service Forecast Office boundaries,  
95 and local news media market areas. The SAWTI is more than a tool for meteorologists and fire  
96 agency managers to assess the severity of Santa Ana winds; it is also a tool for the general public  
97 to help better prepare for impending events that could lead to catastrophic fires. Therefore, the  
98 idea of displaying the product via zones keeps the index simple and easy to understand for all  
99 user groups. The following discussion centers around the assessment of fire potential related to  
100 Santa Ana winds, the methodology behind the weather and fuel components of the index, and its  
101 operational implementation.

## 102 **2. Methodology**

### 103 *a. Large Fire Potential - Weather Component*

104 We define a large fire within the four SAWTI zones to be 100 hectares. The potential for an igni-  
105 tion to reach or exceed this value depends on a number of components: e.g., various meteorological

106 and fuel conditions, suppression strategy, topography, accessibility, and resource availability. We  
107 achieved this threshold by employing a historical fire database that was constructed by Predictive  
108 Services. This database was assembled by collecting fire occurrence data (1990-2013) from all  
109 state and federal fire agencies within the confines of California. For example, some of the fire  
110 agencies include the USDA Forest Service, the Bureau of Land Management, the National Parks  
111 Service, and CALFIRE to mention a few. This database contains information such as ignition date,  
112 acres burned, containment date, etc., and contains 32,683 records. The value of 100 hectares was  
113 achieved by determining what the largest fire was for each day within the database and then taking  
114 the 95<sup>th</sup> percentile of all daily largest fires. The determination of this semi-empirical threshold was  
115 also guided by decades of experience guiding coordinated attacks on wildfires throughout South-  
116 ern California. Moreover, in most cases when this threshold is exceeded, the GACC becomes  
117 engaged in resource mobilization to assist in fire suppression. Current methods to evaluate fire po-  
118 tential include various indices from the National Fire Danger Rating System (NFDRS, (Bradshaw  
119 et al. 1983)) and from the Canadian Forest Fire Danger Rating System (CFFDRS) (Preisler et al.  
120 2008). The Fosberg Fire Weather Index (FFWI) is one such index which is a function of wind  
121 speed, humidity, and temperature with output values ranging from 0 to 100 (Fosberg 1978). While  
122 the FFWI may show elevated output values for a Santa Ana wind event, it can also show elevated  
123 values for *any* day therefore making it too generic for our purposes.

124 Assuming an aggressive suppression strategy is employed with adequate resource availability in  
125 an easily accessible area; Large Fire Potential (LFP) can be simplified into a function involving  
126 fuel and meteorological conditions preceding, during, and following the time of ignition. From  
127 observation and experience, the two weather variables that contribute most toward fire growth  
128 during a Santa Ana wind event are wind velocity and the amount of dry air present near the  
129 surface. To illustrate this concept, we examined the difference between two Southern California

130 fire regimes (Jin et al. 2015) consisting of fire activity during the summer, versus only during  
131 the fall when Santa Ana winds begin to increase in frequency (Figures 2 and 3). It is easy to  
132 see that most of the fire activity during the summer occurs in low wind situations with varying  
133 dewpoint depression values. However, fires burning in the autumn, are commonly associated  
134 with stronger winds and higher dew point depression values. Therefore, based on operational  
135 experience, observations, and model data, we believe the potential for a new ignition to reach or  
136 exceed 100 hectares based solely on weather conditions during a Santa Ana wind event, is best  
137 expressed by the following equation:

$$\text{LFP}_w = 0.001W_s^2D_d \quad (1)$$

138 where  $W_s$  is the near surface (10 m AGL) sustained wind speed (mph), and  $D_d$  is the near surface  
139 dew point depression ( $^{\circ}\text{F}$ ). It should be noted that this equation was validated by examining  
140 dynamically downscaled reanalysis data across Southern California for the month of October from  
141 1979 to 2010. It has been suggested that wind speed has an exponential effect on the spread  
142 of fire among finer fuels such as grass and brush, and that wind can also have the same effect  
143 on fire spread as a fire burning upslope with little or no wind (Rothermel 1972). Dew point  
144 depression ( $T - T_d$ ) depicts the dryness at the surface well, and affects the moisture content of  
145 vegetation. Also, dew point depression can sometimes differentiate better between warm and cold  
146 offshore events than relative humidity can. In our dataset, it has been noted that larger dew point  
147 depression values ( $D_d \geq 24^{\circ}\text{C}$ ) have mainly been associated with warm events. While this may  
148 seem trivial, cold Santa Ana wind events (surface ambient temperatures  $< 16^{\circ}\text{C}$ ) are usually not  
149 associated with large fires (according to our historical fire database previously mentioned). This  
150 may be due in part to lower fuel temperatures because in those cases more time would be needed  
151 to reach the ignition temperature. Another reason is that colder events are sometimes preceded by

152 precipitation either by a few days or by a few weeks which would cause fuels to be less receptive  
153 to new ignitions. These are the primary reasons why temperature was excluded from (1), although  
154 it has been incorporated indirectly through the use of  $D_d$ , and in the fuels component that will  
155 be discussed in the following section. Finally, we note that while (1) bears some resemblance  
156 to the FFWI, a comparison of daily outputs of FFWI and  $LFP_w$  revealed that  $LFP_w$  provides  
157 significantly greater contrast between Santa Ana days and non-Santa Ana days. Therefore, these  
158 results favored  $LFP_w$  as being the more appropriate equation for our purpose.

### 159 *b. Large Fire Potential - Fuel Moisture Component*

160 In addition to the meteorological conditions, LFP is also highly dependent on the state of the  
161 fuels. Given the complexity of the fuel environment (i.e., fuel type, continuity, loading, etc.), we  
162 decided to focus more specifically on fuel moisture since that aspect plays a critical role in the  
163 spread of wildfires (Chuvieco et al. 2004). For our purpose, we have condensed fuel moisture  
164 into three parameters: 1) dead fuel moisture, 2) live fuel moisture, and 3) the state of green-up of  
165 the annual grasses. Each of these aspects of fuel moisture is complex and will be defined more  
166 specifically later. We combined these moisture variables into one term which we refer to as the  
167 Fuel Moisture Component (FMC). While the variables within FMC often act in concert with each  
168 other, there are times when they are out of phase with one another due to the variability in precip-  
169 itation (frequency and amount) that occurs across Southern California during the winter. Through  
170 a comprehensive empirical investigation, the governing equation for FMC can be expressed as  
171 follows:

$$FMC = \left[ 0.1 \left( \left( \frac{DL}{LFM} - 1 \right) + G_{ag} \right) \right]^{1.7} \quad (2)$$

172 where DL is the Dryness Level consisting of the Energy Release Component (ERC) and the  
173 10 hour dead fuel moisture time lag ( $DFM_{10hr}$ ). Dead fuel refers to non-living plant material

174 whose moisture content responds only to ambient moisture. Dead fuel is typically grouped into  
175 “timelag” classes according to diameter as follows: 0.16 in. (DFM<sub>1hr</sub>), 0.50 in. (DFM<sub>10hr</sub>), 1.57 in.  
176 (DFM<sub>100hr</sub>) and 5.00 in. (DFM<sub>1000hr</sub>). Live Fuel Moisture (LFM) is a sampling of the moisture  
177 content of the live fuels indigenous to the local region, and G<sub>ag</sub> is the degree of green-up of the an-  
178 nual grasses. Currently we are making the assumption that all the terms in (2) have equal weight,  
179 but further study may lead to future modification.

## 180 1) DRYNESS LEVEL

181 The DL is a function of ERC and DFM<sub>10hr</sub> calibrated to historical fire occurrence across South-  
182 ern California with unitless values ranging from 1 to 3. ERC is a relative index of the amount of  
183 heat released per unit area in the flaming zone of an initiating fire and is comprised of live and  
184 dead fuel moisture as well as temperature, humidity, and precipitation (Bradshaw et al. 1983).  
185 While ERC is a measure of potential energy, it also serves to capture the intermediate to long term  
186 dryness of the fuels with unitless values generally ranging from 0–100 (using NFDRS fuel model  
187 G). The DFM<sub>10hr</sub> represents fuels in which the moisture content is exclusively controlled by en-  
188 vironmental conditions (Bradshaw et al. 1983). Output values of DFM<sub>10hr</sub> are in g/g expressed  
189 as a percentage ranging from 0–60. In the case of the DFM<sub>10hr</sub>, this is the time required for dead  
190 fuels (0.64–2.54 cm in diameter) to lose approximately two-thirds of their initial moisture content  
191 (Bradshaw et al. 1983). Thus a DL of 1 indicates that dead fuels are moist, 2 represents average  
192 dead fuel dryness, and a 3 indicates that the dead fuels are drier than normal.

## 193 2) LIVE FUEL MOISTURE (LFM)

194 The observed LFM is the moisture content of live fuels, e.g., grasses, shrubs, and trees, expressed  
195 as a ratio of the weight of water in the fuel sample to the oven dry weight of the fuel sample (Pollet

196 and Brown 2007). Soil moisture as well as soil and air temperature govern the physiological  
197 activity which results in changes in fuel moisture (Pollet and Brown 2007). LFM is a difficult  
198 parameter to evaluate because of the irregularities associated with observed values. For instance,  
199 samples of different species of native shrubs are normally taken twice a month by various fire  
200 agencies across Southern California. However, the sample times often differ between agencies  
201 and the equipment used to dry and weigh the samples may vary from place to place. In addition,  
202 sample site locations are irregular in distribution and observations from these sites may be taken  
203 sporadically. This presents a problem when we attempt to assess LFM over the region shown in  
204 Figure 1.

205 Apart from taking fuel samples, there are several ways of estimating LFM using meteorological  
206 variables, soil water reserve, solar radiation, etc. (Castro et al. 2003). In particular, we devel-  
207 oped an approach to modeling the LFM of chamise or greasewood (*Adenostoma fasciculatum*), a  
208 common shrub that grows within the chaparral biome in Southern California and is particularly  
209 flammable due to its fine, needle-like leaves and other characteristics (Countryman and Philpot  
210 1970). This strategy makes use of historical observed LFM data from 10 sampling sites across  
211 Southern California and soil moisture from the 40–100 cm layer (SMOIS<sub>40–100cm</sub>) from the North  
212 American Land Data Assimilation System, Phase 2 (NLDAS–2). At each sampling site, LFM  
213 deviations from climatology are predicted using SMOIS<sub>40–100cm</sub> departures from its own annual  
214 cycle. A key element of the model is the incorporation of a 22 day lag between SMOIS<sub>40–100cm</sub>  
215 and LFM which improved the model fits. This is because a certain period of time elapses during  
216 which water percolates downward through the soil layers and then is drawn back up through the  
217 root system of the plant. This time can vary between 4 and 43 days depending on the evapora-  
218 tive conditions, soil structure, and site elevation. An average of this time-lag over all the stations

219 equated to 22 days. LFM observed now is relatable to gridded NLDAS-2 soil moisture anomalies  
220 from about three weeks earlier.

221 That approach, although quite skillful, results in site-specific equations not easily generalized  
222 across Southern California. The SAWTI index presently makes use of a simplified version of this  
223 strategy, applied to all grid points in the domain. For a given day, the model can be expressed as  
224 follows:

$$\text{LFM} = (\text{SMOIS}_{40-100\text{cm } 22\text{days}} - \text{SMOIS}_m) + 82, \quad (3)$$

225 where  $\text{SMOIS}_{40-100\text{cm } 22\text{days}}$ , is the soil moisture of the 40–100 cm layer from 22 days earlier,  
226 and  $\text{SMOIS}_m$ , is the mean soil moisture from 2009 to 2012 for that same date. The empirically  
227 selected constant of 82 roughly approximates the annual mean LFM over a large variety of sites.

### 228 3) ANNUAL GRASSES ( $G_{\text{ag}}$ )

229 Following the onset of significant wetting rains, new grasses will begin to emerge in a process  
230 called green-up. While the timing and duration of this process fluctuates from year to year, some  
231 degree of green-up usually occurs by December across Southern California. During the green-up  
232 phase, grasses will begin to act as a heat sink, thereby preventing new ignitions and/or significantly  
233 reducing the rate of spread among new fires. By late spring these grasses begin to cure with the  
234 curing phase normally completed by mid-June. In (2),  $G_{\text{ag}}$  is a value that quantifies the said  
235 green-up and curing cycles of annual grasses.

236  $G_{\text{ag}}$  is derived from the Moderate Resolution Imaging Spectroradiometer (MODIS) NDVI data  
237 at a resolution of 250 meters for select pixels consisting solely of grasslands. NDVI is further  
238 defined by red and near-infrared (NIR) bands in the following equation:

$$\text{NDVI} = \frac{\rho_{\text{NIR}} - \rho_{\text{b}}}{\rho_{\text{NIR}} + \rho_{\text{b}}} \quad (4)$$

239 where  $b$  is the reflectance in band  $b$  (Clinton et al. 2010). It can be shown that NDVI values  
 240 for Southern California grasslands generally range from about 0.25 ( $\pm 0.05$ ) to 0.75 ( $\pm 0.05$ ) for  
 241 an average rainfall year (Figure 4). There is evidence that NDVI is affected by soil color (Elmore  
 242 et al. 2000), which may explain the NDVI differences ( $\pm 0.05$ ) seen among the selected Southern  
 243 California grassland locations.

244  $G_{ag}$  is given a rating of 0 to 5 based on NDVI data, where 0 is green and 5 is fully cured. When  
 245 applying the methodology discussed by White (White et al. 1997) to the general range of Southern  
 246 California grasslands, green-up is estimated to have occurred when NDVI exceeds 0.50. However,  
 247 we have found that this value can be closer to 0.64 for some sites, and therefore NDVI values  
 248 greater than 0.64 are assigned a value of 0, or green. Furthermore, NDVI values less than or equal  
 249 to 0.39 are assigned a value of 5. This is because NDVI values are observed to be below 0.39  
 250 for all grassland sites during the dry season when grasses are known to be fully cured. A linear  
 251 relationship exists between NDVI-derived values of  $G_{ag}$  and fire occurrence in Southern California  
 252 (Figure 5). For this reason, the transition between green and fully cured (or vice versa) was given  
 253 a rating of 1 to 4 in NDVI increments of 0.05 (Table 1).

254 To model NDVI, we used MODIS-derived NDVI biweekly data observed at 21 stations shown  
 255 in Figure 1, interpolated to daily frequency using cubic splines. The data availability period was  
 256 January 2004-June 2012. For the ease of implementation, our goal was to create a simple, yet  
 257 skillful equation to capture the temporal variation of NDVI:

$$\begin{aligned}
 \text{NDVI} = & \alpha + \beta_1 \cos(2\pi \text{DOY} / \text{LOY}) + \beta_2 \text{PRECIP}_{\text{accum}} \\
 & + \beta_3 \text{RH}_{\text{avg}} + \beta_4 \text{VEG}_{\text{frac}} + \beta_5 \text{SMOIS}_{40-100\text{cm}}
 \end{aligned}
 \tag{5}$$

258 where  $\text{DOY} = \text{January } 1^{\text{st}}\text{-based day of year}$  and  $\text{LOY}$  is the length of year in days. The regressor  
 259  $\text{PRECIP}_{\text{accum}}$  is the September  $1^{\text{st}}\text{-based annually accumulated precipitation [mm]}$ ,  $\text{RH}_{\text{avg}}$  is the



260 30-day running averaged to relative humidity,  $VEG_{\text{frac}}$  is the surface vegetation fraction (0 – 1),  
261 and  $SMOIS_{40-100\text{cm}}$  is the soil moisture content of the 40 – 100 cm depth [ $\text{kg}/\text{m}^3$ ]. This equation  
262 was the result of the “random forest” selection and stepwise regression applied to a large number  
263 of meteorological candidate regressors; see Cao (2015) for more information. The  $R^2$  of the model  
264 is 0.73; see Table 2 for coefficient values.

265 We applied this model to the 21 sites in the four zones shown in Figure 1. It is recognized that at  
266 some stations and times, the NDVI predictions are somewhat out of phase (i.e., the up and down  
267 ramps are too early or too late) with the observations, and the peaks are over or under predicted  
268 at different locations and times. The marked drought year of 2007 is clearly a problem at some  
269 locations, especially in zone 2. However, considering the fact that this is a simple universal model  
270 with only 5 regressors applied across Southern California, we believe it has shown adequate skill  
271 overall (Cao 2015).

### 272 *c. Large Fire Potential - Weather and Fuels*

273 Given our derived expression for fuel characteristics we can now predict large fire potential  
274 during Santa Ana wind events taking into consideration both the weather and the fuels. FMC  
275 modifies (1) in cases where fuels have not fully cured and are still inhibiting fire spread. Output  
276 values of FMC range from 0 to 1, where 0 represents wet fuels and 1 denotes dry fuels. This  
277 modifier can become so influential that it will greatly reduce or even eliminate the potential for  
278 large fire occurrence despite favorable meteorological conditions for rapid fire growth. So the final  
279 equation for large fire potential becomes:

$$LFP = 0.001W_s^2D_dFMC \quad (6)$$

280 The value of the incorporation of fuel moisture predictions into the index is illustrated in Figure 6.  
281 For example, examination of the period between September 2008 and May 2009 shows a number  
282 of significant Santa Ana wind events indicated by the spikes in  $LFP_w$ . The difference between  
283  $LFP_w$  and  $LFP$  is small during the fall months attributed to high FMC values. This is confirmed  
284 by viewing the relatively close spatial agreement between  $LFP_w$  and  $LFP$  (Figure 7). In contrast,  
285 large differences occur after significant winter rains commence (Figure 8). Large wildfires had  
286 occurred during each of the spikes noted in the fall while little fire activity was recorded despite  
287 the  $LFP_w$  spikes during January. This is precisely due to low FMC values which illustrates the  
288 critical role that fuels play in this index.

### 289 **3. Operational SAWTI**

#### 290 *a. Model Configuration*

291 The data ingested to compute the four-zone, six-day LFP operational forecasts comes from mul-  
292 tiple sources at different temporal and horizontal resolutions ranging from hourly to daily, and  
293 3 km to 12.5 km, respectively (Figure 9). To reduce the exposure to error in fields with long  
294 accumulation periods, we sourced input variables for LFM and NDVI from the NLDAS-2 data  
295 (constructed using a land surface model in conjunction with assimilated observations and atmo-  
296 spheric model output). In contrast, hourly DFM and ERC values are predicted using offline models  
297 (Nelson (2000), (Carlson et al. 2007) and NFDRS) forced by WRF weather output.

298 DFM and ERC are calculated from meteorological variables predicted using WRF version 3.5  
299 (Skamarock et al. 2008), run at 3 km and 6 km horizontal resolution. We selected a WRF config-  
300 uration which minimized errors with respect to near-surface temperature, winds, and dew point  
301 during Santa Ana Wind events (Cao 2015; Cao and Fovell 2016). This configuration includes

302 the simple WRF Single-Moment 3-class microphysics scheme (Hong et al. 2004), RRTMG short-  
303 wave and longwave radiation schemes (Iacono et al. 2008), the MM5 Monin-Obukhov surface  
304 layer scheme, and the Asymmetrical Convective Model version 2 boundary layer scheme (Pleim  
305 2007). The Noah land-surface model (Tewari et al. 2004) with 4 soil layers was used in conjunc-  
306 tion with the MODIS land use dataset. Each operational WRF forecast dynamically downscales  
307 the 12 km resolution 00Z and 12Z North American Mesoscale Forecast System (NAM) 1-3.5 day  
308 forecasts to 3 km resolution. We use a two-way nested WRF domain configuration consisting of  
309 a 3 km resolution innermost domain nested within a 9 km resolution outermost domain with 51  
310 vertical levels. To extend the forecast out to 6 days, the  $0.25^\circ$  resolution Global Forecast Sys-  
311 tem (GFS) is downscaled using WRF to 6 km resolution. We use a two-way nested WRF domain  
312 configuration consisting of a 6 km resolution innermost domain nested within an 18 km outer and  
313 54 km outermost domain with 46 vertical levels. To help determine bounds and behavior of the  
314 SAWTI equations and place forecasts in historical perspective, we dynamically-downscaled the  
315 32 km resolution North American Regional Reanalysis (NARR, (Mesinger et al. 2006)) data set to  
316 3 km resolution using WRF over the historical period spanning January 1984 through December  
317 2013. We used a two-way nested WRF domain configuration consisting of a 27 km resolution  
318 outer, 9 km resolution inner and 3 km resolution innermost domain with 51 vertical levels. WRF  
319 was integrated across 3.5 day periods with the first 12 hours from each period discarded as spin-up  
320 time.

321 *b. Calculating SAWTI*

322 1) WEATHER

323 Equation 1 is temporally averaged at each WRF grid point across the domain using the following  
324 equation:

$$\text{LFP}_{w,\text{gpx}} = \frac{\text{LFP}_{w\text{hour}1} + \text{LFP}_{w\text{hour}2} + \dots + \text{LFP}_{w\text{hour}8}}{8} \quad (7)$$

325 where  $\text{LFP}_{w,\text{gpx}}$  is an average  $\text{LFP}_w$  value over an eight-hour time period at grid point  $x$ . An  
326 eight hour time period was chosen because that is ample time for the finer fuels (i.e.,  $\text{DFM}_{10\text{hr}}$ )  
327 to respond to the ambient atmospheric conditions. Once an average  $\text{LFP}_w$  had been calculated for  
328 each grid point, the maximum eight hour average  $\text{LFP}_w$  for each day is then spatially averaged  
329 over each zone as follows:

$$\text{LFP}_{w,\text{zone}} = \frac{\text{LFP}_{w\text{gp}1} + \text{LFP}_{w\text{gp}2} + \dots + \text{LFP}_{w\text{gpx}}}{\text{Number of grid points per zone}} \quad (8)$$

330 where  $\text{LFP}_{w,\text{zone}}$  is the maximum 8 hr averages at each grid point within the model domain. It  
331 is important to note that (7) was calculated for five different eight consecutive hour time periods  
332 with the highest value chosen to represent each zone for the day (Figure 10). This is to ensure that  
333 the worst conditions are being captured on a daily basis. For instance while most Santa Ana wind  
334 events peak during the morning hours, some events can peak later in the day or at night depending  
335 on the arrival time of stronger dynamical support. Thus calculating  $\text{LFP}_w$  for only one consecutive  
336 eight-hour time period may fail to capture the worst conditions of the day. This more simplistic  
337 approach was favored compared to using an 8 hr running average.

338 2) FUELS

339 Recall that DL relates ERC and DFM to historical fire activity. To provide a DL forecast,  
340 DFM and ERC are computed across the spun-up WRF forecast period. To avoid the potentially

341 long spin-up times required by DFM, the DFM must be initialized at each grid point across the  
342 WRF domain. Since a publicly-available gridded observed DFM product does not exist, DFM  
343 is initialized using the previous day's DFM forecast valid at the 4<sup>th</sup> hour of the current WRF  
344 forecast. The first four hours of each WRF forecast are removed to allow for model spin-up and  
345 avoid contamination of DFM and ERC due to relatively unrealistic atmospheric inputs. Due to  
346 the need for this continuous spun-up DFM time series, WRF forecasts must be uninterrupted.  
347 However, if any WRF forecasts are missed, DFM forecasts could be initialized using output from  
348 earlier WRF/DFM forecasts which are archived for at least a month.

349 Quasi-observational data (NLDAS-2) is available for estimating LFM and NDVI using equa-  
350 tions 3 and 5, respectively. The 22-day lagged soil moisture required for LFM is provided from  
351 the Noah land surface model output of the NLDAS-2 dataset. For NDVI, the latest NLDAS-2  
352 output is used (typically a five day lag) which provides vegetation fraction, 2 m relative humidity,  
353 and soil moisture. Archived NLDAS-2 data is needed going back to the previous September 1  
354 for cumulative precipitation. Both LFM and NDVI are re-gridded from the NLDAS-2 12.5 km  
355 to the 3 km horizontal resolution matching the WRF domain using bilinear interpolation and held  
356 constant across the 6-day forecast period. In contrast to weather which is calculated hourly, fuel  
357 conditions are calculated only at 1300 LST, representing fuel conditions for the entire day.

### 358 *c. Public Dissemination*

359 Social science was incorporated during the early stages of the developmental process of SAWTI  
360 (Wall, et al. 2014). The Desert Research Institute provided a social scientist to conduct an in-depth  
361 survey of 5 communities across Southern California. Much of the survey centered on questions  
362 regarding how the public obtains weather and fire information, and their associated responses to  
363 that information. The results of the survey were used to help determine the type of information

364 that would be presented in the product. In conjunction with the social science, historical weather  
365 and fuels data were correlated to historical fire occurrence records to develop index threat level  
366 categories. For example, for each SAWTI zone we compared daily FMC values along with daily  
367  $LFP_w$  values from (1) for the historical period (1992–2011) to whether or not a fire had occurred.  
368 We repeated the process this time equating the output to whether or not a 100 hectare fire or greater  
369 occurred (Figure 11). Comparing these two results yielded a conditional probability for an ignition  
370 to reach or exceed 100 hectares based on FMC and LFP values. By assessing and employing these  
371 probabilities, LFP breakpoints could easily be determined (see section e for more details).

372 The SAWTI has 4 threat levels that range from “Marginal” to “Extreme”. When Santa Ana  
373 winds are either not expected or will not contribute to significant fire activity, then a “No Rating”  
374 is issued for that day. For example, it could be possible that if a strong Santa Ana wind event were  
375 to transpire after appreciable rains occurred or when fuels are wet, the event would be categorized  
376 as a “No Rating”. For definitions of other threat levels, see Table 3. Tied to each threat level is  
377 a list of recommended actions suggested to the public to better prepare for an impending event.  
378 Examples include: “Clean debris away from your house, charge your cell phone and make sure  
379 you have plenty of gas”. The list of recommended actions expands as the threat levels increase.  
380 This aspect of the product is critical as it serves to link categories of severity with public awareness.

381 The product consists of an online webpage (<http://sawti.fs.fed.us>) that displays a 6-day  
382 forecast of the above mentioned categories for each of the 4 zones across Southern California  
383 (Figure 12). A map of the region stands as the centerpiece of the page and graphically shows the  
384 categories which are colorized ranging from grey (“No Rating”) to purple (“Extreme”). The prod-  
385 uct is issued once daily but can be updated more frequently if conditions warrant. The webpage  
386 allows users to obtain more information such as viewing the latest weather observation from select  
387 stations when zoomed in on the map. The page will also display active and non-active fires (via

388 icons) on the map when such activity is present. Selecting one of these icons will provide the  
389 user with specific fire information such as acreage burned, percent contained, and links to more  
390 data. SAWTI also has a Twitter feed ([https://twitter.com/sawti\\_forecast](https://twitter.com/sawti_forecast)) where users  
391 are notified about changes in threat levels.

392 The product was beta tested for a year prior to it becoming a public product in the fall of 2014.  
393 During the beta test phase, the index performed well in capturing all events that occurred during the  
394 fall of 2013 through the spring of 2014 which ranged from “No Rating” to “High”. Several notable  
395 events include: 16 January 2014 (Colby fire), 29 April 2014-1 May 2014 (Etiwanda fire), and 13-  
396 14 May 2014 (the San Diego fires). Fire agencies that were granted access to the index during  
397 this time used the product to make critical decisions regarding the allocation and mobilization of  
398 shared fire resources prior to when these fires occurred. Specifically, the event that occurred on 13-  
399 14 May 2014 was especially notable due to the fact that winds were unusually strong during this  
400 period, and that multiple large fires occurred as a result. Figure 13 shows a map of the fires across  
401 San Diego County, while Figure 14 shows the SAWTI in beta test form for this event. The product  
402 was officially released to the public on September 17, 2014 via a press release and an associated  
403 press conference. Since that time, the product has been used by local news media across the San  
404 Diego and Los Angeles metropolitan areas, as well as being shown on The Weather Channel.

#### 405 *d. Validation*

406 Fire potential is very difficult to validate since our model is based on a conditional probability  
407 (i.e., getting an ignition). In addition, once an ignition occurs there are a number of human be-  
408 haviors that cannot be predicted which can influence fire potential. For instance, if the SAWTI  
409 indicates a high likelihood of having a large fire for a particular Santa Ana wind event and one  
410 does not occur, it does not necessarily mean the model performed poorly. There may not have

411 been an ignition during the event, or there may have been an ignition, but adequate fire-fighting  
412 resources were made available to be successful in suppressing the incident before becoming large.  
413 There have been a few times where the index displayed a “No Rating” and a large fire occurred,  
414 but this is very rare.

415 Modeling fuel conditions accurately presents certain challenges. Regarding DFM, validating  
416 WRF DFM and ERC is limited given the sparse observations across this domain. Various Re-  
417 mote Automated Weather Stations (RAWS) calculate DFM using measured atmospheric inputs  
418 including near-surface temperature, relative humidity, precipitation, and solar radiation. We vali-  
419 date WRF DFM and ERC across 2 years of the 30 year historical period at 14 RAWS (Figure 15).  
420 These stations were selected so that at least 3 stations represent zones 1, 2 and 3. Zone 4 has  
421 relatively fewer RAWS reporting DFM and ERC measurements for the time period of interest,  
422 thus only 1 station represents zone 4. At each RAWS location, the closest WRF gridcell with  
423 the smallest elevation difference was selected for validation. We show 2 example timeseries plots  
424 (Figures 16 and 17) for Goose Valley and Claremont RAWS. At the Goose Valley RAWS site  
425 (Figure 16), WRF DFM and ERC output agrees well with RAWS measurements for most of the  
426 2 years examined with only a slightly positive bias of 0.24 and 2.14 for  $DFM_{100hr}$  and  $DFM_{1000hr}$ ,  
427 respectively. At the Claremont RAWS (Figure 17), WRF DFM and ERC output compares less  
428 favorably at certain times over the 2 years and strongly during others. However, we report small  
429 biases at the Claremont RAWS of  $-1.27$  and  $1.30$  for  $DFM_{100hr}$  and  $DFM_{1000hr}$ , respectively, with  
430 RMSEs of 4.22 and 2.65. Table 4 shows WRF error statistics for all 14 RAWS across the 2 year  
431 period. The WRF  $DFM_{100hr}$  bias ranges from  $-1.27$  to 4.00, RMSE ranges from 2.72 to 4.93  
432 with correlation ranging from 0.55 to 0.86. Our WRF  $DFM_{1000hr}$  has a positive bias ranging from  
433 1.30 to 6.00, RMSE spanning 2.50 to 6.15 and correlation from 0.54 to 0.92. Finally, WRF ERC  
434 bias is mostly negative given the positive  $DFM_{1000hr}$  bias ranging from  $-25.09$  to 0.50, RMSE



435 ranging from 9.52 to 27.41 and correlation from 0.53 to 0.90. It is hypothesized that WRF does not  
436 adequately resolve the complex topography at the two RAWS that have the worst error statistics,  
437 Chilao and Palomar.

438 *e. Climatology*

439 The historical dataset described previously provides us with an unprecedented 30 year climatol-  
440 ogy of the fuel and weather variables related to wildfires across the 4 SAWTI zones in Southern  
441 California. Having this dataset has allowed us first to create breakpoints within the raw SAWTI  
442 output necessary for the development of the 4 threat levels which are integral to the final pub-  
443 lic product. To do this, we correlated historical fire occurrence data with historical  $LFP_w$  values  
444 from the dataset to develop breakpoints for the SAWTI. Most of the breakpoints fell naturally but  
445 with some minor adjustments we created breakpoints at the 50<sup>th</sup>, 75<sup>th</sup>, 90<sup>th</sup>, and 97<sup>th</sup> percentiles.  
446 Significant increases in conditional probabilities for each category seemed to confirm our choices.

447 This unique dataset informs us about the historical significance the fuels, weather, and SAWTI  
448 events have had during the past 30 years. Having the ability to put past, but perhaps more im-  
449 portantly, forecasted SAWTI events into historical perspective helps inform the public and first  
450 responders about the nature and the characteristic of an impending event. For example, we can  
451 authoritatively state that the Santa Ana wind event which helped to spawn the Witch Creek Fire  
452 (and served as the catalyst for the development of this index) was ranked the highest event in the  
453 30 year dataset for zones 1 and 2.

454 As we continue to explore this dataset, we hope to gain a better understanding of the climatology  
455 of Santa Ana winds during the past 3 decades, including detecting and understanding inter-annual  
456 trends and cycles in event frequencies and strength. Figure 18 shows the number of days when  
457 Santa Ana winds occurred across zone 3 for the period spanning 1984 to 2013. This figure reveals

458 a noticeable upward trend in the frequency of Santa Ana wind days during approximately the last  
459 10 years ending in 2013. Preliminary research shows that this long-term trend in frequency (pos-  
460 sibly associated with a longer-term inter-annual cycle) coincides with a predominately negative  
461 phase of the Pacific Decadal Oscillation (PDO). Further investigation conducted in a future paper  
462 will seek to explore the causal mechanisms for this trend in frequency, as well as other trends in  
463 Santa Ana wind characteristics.

#### 464 **4. Summary and Conclusions**

465 As the Wildland Urban Interface (WUI) continues to expand across Southern California, the  
466 source of ignitions will increase leading to a greater probability for large and destructive fires  
467 during Santa Ana wind events. This puts the public and firefighter safety at risk, thus the increasing  
468 need to categorize such events in terms of their effect on the fire environment.

469 Predictive Services' initial efforts to categorize Sana Ana winds helped to provide the leadership  
470 and guidance necessary for the development of the SAWTI. Through the successful collaboration  
471 between government, academia, and the private sector, high resolution model data along with  
472 satellite derived variables allowed us to incorporate fuel and weather data into the index on a grid-  
473 ded domain within Southern California. Challenges surrounding the assessment of fuel conditions  
474 include the difficulty in determining different fuel moisture parameters which can sometimes re-  
475 sult in a less accurate evaluation of fuel conditions. Further refinement of the model is needed to  
476 improve the overall output. However, during the beta test process, the index performed very well  
477 with positive responses from the recipients of the preliminary output. Since its public unveiling,  
478 the index has been well received by the media and the fire community.

479 Our 30 year dataset is unprecedented. Not only does it provide us with 30 years of fuel moisture  
480 data across southern California (which is useful in relating fuel conditions with drought), it also

481 gives us quantifiable outputs of average wind velocity, dew point depression, and the SAWTI itself.  
482 This allows us to put past and future Santa Ana events (magnitude, duration, and spatial coverage)  
483 into historical perspective which is significant. Future studies in the climatology of such events  
484 can be conducted leading to a better understanding of why certain trends exist.

485 Fire agencies and first responders, private industry, the general public, and the media now have a  
486 new operational tool that determines the severity of Santa Ana wind events. Furthermore, they will  
487 have a clearer understanding of the severity of an event based on the potential for large fires to oc-  
488 cur. Specifically, a more effective media response will result in the general population (particularly  
489 those living within the WUI) being more proactive in its response to an impending event.

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TABLE 1: Relationship between NDVI and greenness.

NDVI	$G_{ag}$ Number	Description
$NDVI > 0.64$	0	Green
$0.59 < NDVI \leq 0.64$	1	
$0.54 < NDVI \leq 0.59$	2	
$0.49 < NDVI \leq 0.54$	3	
$0.39 < NDVI \leq 0.49$	4	
$0 \leq NDVI \leq 0.39$	5	Cured

TABLE 2: Selected NDVI Regressors.

<i>Coefficient</i>	<i>Value</i>
$\alpha$	-0.314867
$\beta_1$	0.11253592
$\beta_2$	1.44E-05
$\beta_3$	0.00355647
$\beta_4$	0.911360168
$\beta_5$	0.002412815

TABLE 3: Categories of threat levels and their descriptions.

<i>Category</i>	<i>Description</i>
NO RATING	Santa Ana winds are either not expected, <i>or</i> will not contribute to significant fire activity.
MARGINAL	Upon ignition, fires <i>may</i> grow rapidly.
MODERATE	Upon ignition, fires <i>will</i> grow rapidly and <i>will</i> be difficult to control.
HIGH	Upon ignition, fires will grow <i>very</i> rapidly, will burn intensely, and will be <i>very</i> difficult to control.
EXTREME	Upon ignition, fires will have extreme growth, will burn <i>very</i> intensely, and will be uncontrollable.

TABLE 4: WRF error statistics at each RAWS for time spanning January 2012 through December 2013.

Station Name	100hr DFM			1000hr DFM			ERC		
	<i>Bias</i>	<i>RMSE</i>	<i>CORR</i>	<i>Bias</i>	<i>RMSE</i>	<i>CORR</i>	<i>Bias</i>	<i>RMSE</i>	<i>CORR</i>
Camp Elliot	0.17	3.90	0.55	1.75	2.97	0.54	-0.71	11.12	0.53
Cheeseboro	0.99	3.30	0.69	3.89	4.25	0.75	-10.78	14.81	0.74
Chilao	4.00	4.93	0.84	6.00	6.15	0.92	-25.09	27.41	0.89
Claremont	-1.27	4.22	0.66	1.30	2.65	0.76	0.50	13.71	0.79
Clark	-0.06	3.24	0.69	2.80	3.39	0.75	-4.27	11.24	0.76
Descanso	2.45	4.07	0.82	3.93	4.40	0.85	-14.40	18.39	0.84
El Cariso	1.26	3.70	0.73	3.27	3.94	0.81	-9.19	15.02	0.82
Fremont Canyon	-0.03	3.73	0.66	2.21	3.13	0.63	-2.52	11.25	0.73
Goose Valley	0.24	3.96	0.65	2.14	2.90	0.78	-4.82	11.50	0.77
Julian	0.95	3.97	0.80	2.36	3.05	0.90	-4.81	10.54	0.90
Los Prietos	-0.97	2.72	0.74	1.69	2.67	0.72	-3.27	10.45	0.72
Palomar	3.06	4.46	0.86	4.12	4.82	0.88	-14.72	20.12	0.88
Rose Valley	0.74	2.83	0.77	3.06	3.45	0.85	-10.06	14.06	0.82
Valley Center	-0.22	3.80	0.67	1.84	2.50	0.80	-2.32	9.52	0.78

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611 both FMC (bin interval of 0.099) and  $LFP_w$ (bin interval of 5). Bubble size indicates the  
612 conditional probability for an ignition to meet or exceed 100 hectares. For instance, 100%  
613 of fires which ignited during conditions characterized with  $FMC \geq 0.7$  and  $LFP_w \geq 36$  grew  
614 into large fires. . . . . 45

615 **Fig. 12.** Online operational SAWTI product. . . . . 46

616 **Fig. 13.** Map of active fires (icons) on May 14, 2014 across San Diego County. . . . . 47

617 **Fig. 14.** SAWTI (in beta test) during May 14-15, 2014. . . . . 48

618 **Fig. 15.** RAWS used to validate WRF DFM and ERC. . . . . 49

619 **Fig. 16.** RAWS (red line) and closest WRF gridcell (green line) timeseries of 100 (top) and 1000 hr  
620 (middle) dead fuel moisture and ERC (bottom row) spanning January 2012 through Decem-

621	ber 2013 for Goose Valley. WRF output coincides with RAWS 1300 LST measurements.	
622	Each plot is annotated with WRF output bias, RMSE and Spearman correlation. . . . .	50
623	<b>Fig. 17.</b> Same as figure 16 except for Claremont RAWS. . . . .	51
624	<b>Fig. 18.</b> Number of Santa Ana wind days per rain year (July 1 through June 30) for years spanning	
625	1984–2014 (solid black line). Dashed line is a polynomial fit to the data which helps depict	
626	the longer-time period trends. . . . .	52

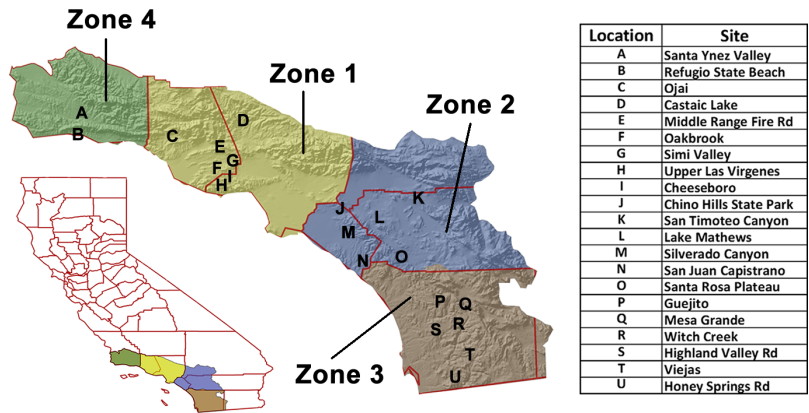


FIG. 1: Map of SAWTI zones. Inset shows SAWTI zones in reference to the state of California. Letters denote location of NDVI grassland sites with underlying topography shaded. Site names are provided in the lookup table to the right. County boundaries shown in red.

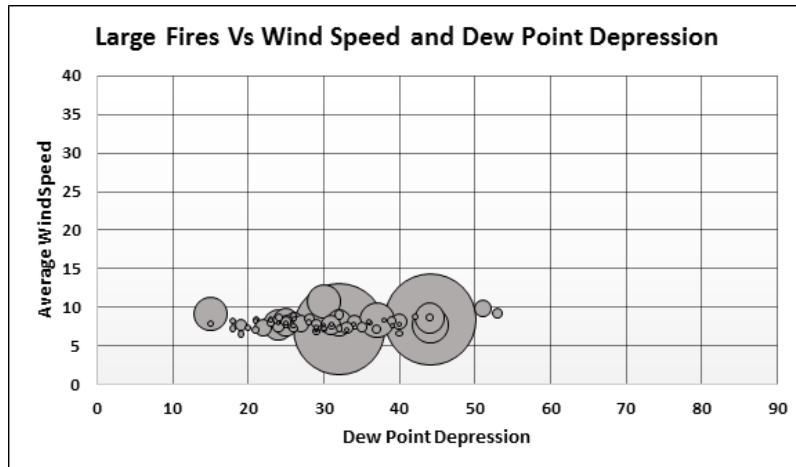


FIG. 2: Relationship of large fire ( $\geq 100$  hectares) occurrence and relative size with respect to average wind speed and dew point depression across zone 1 between June 1st and September 20th from 1992 to 2012. Bubble size represents relative fire size.



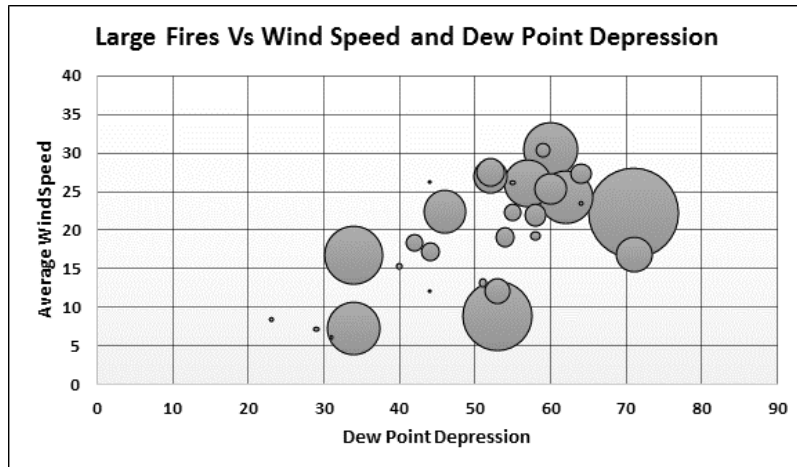


FIG. 3: Same as Figure 2 except between September 21st through December 31st.

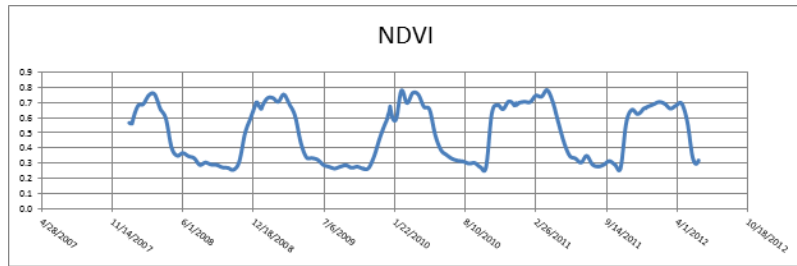


FIG. 4: Sample annual NDVI output.

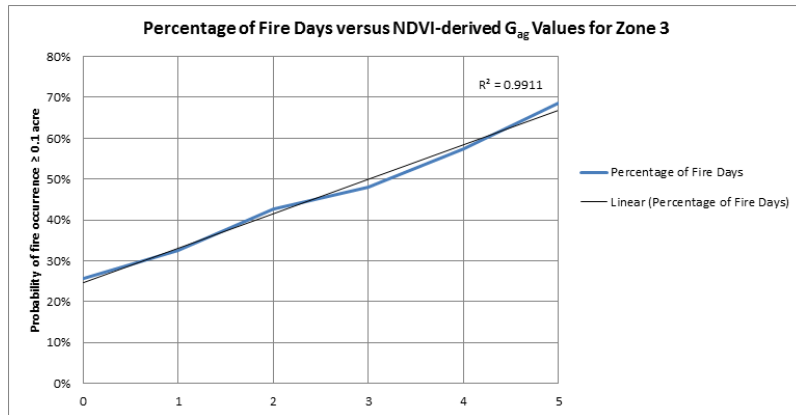


FIG. 5: Probability of fires  $\geq 0.04$  hectares predicted by NDVI-derived  $G_{ag}$  for zone 3.

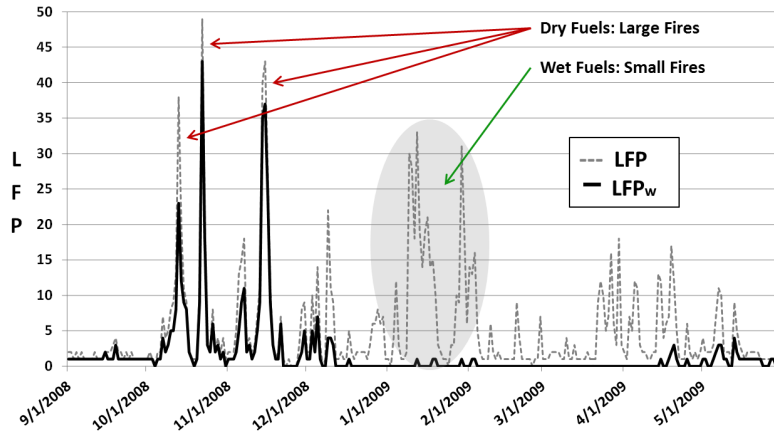


FIG. 6: Comparison of  $LFP_w$  and  $LFP$  timeseries for zone 1 during the period spanning September 2008 through May 2009. For large fires that occurred in October and November of 2008, relatively dry fuels ( $LFP$ , solid black line) accompanied the dry and windy weather ( $LFP_w$ , dashed grey line). In contrast, January through February of 2009, experienced peaks of windy and dry conditions ( $LFP_w$ ) accompanied by moist fuels ( $LFP$ ) and, as a result, no fires grew larger than 100 hectares.

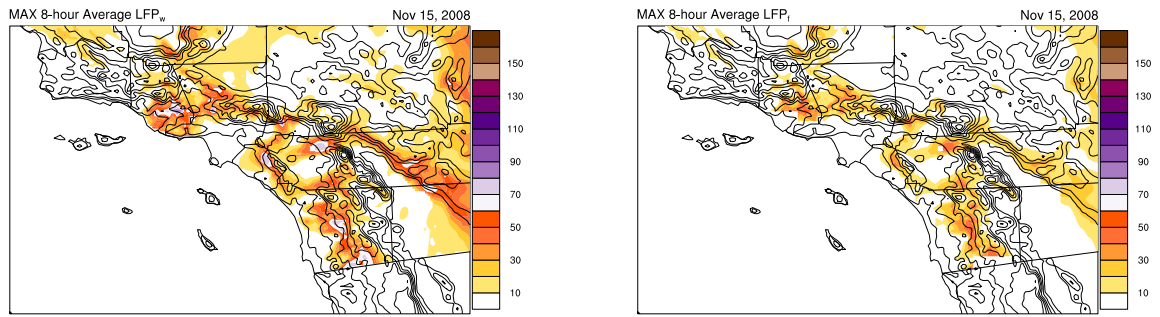


FIG. 7: Average LFP<sub>w</sub> (left) and LFP (right) from 8am to 3pm during a Santa Ana event on November 15, 2008. This offshore event was accompanied by the Freeway Complex Fire which burned over 12,141 hectares while destroying 187 homes and damaging 117 others ([http://cdfdata.fire.ca.gov/incidents/incidents\\_details\\_info?incident\\_id=305](http://cdfdata.fire.ca.gov/incidents/incidents_details_info?incident_id=305)).

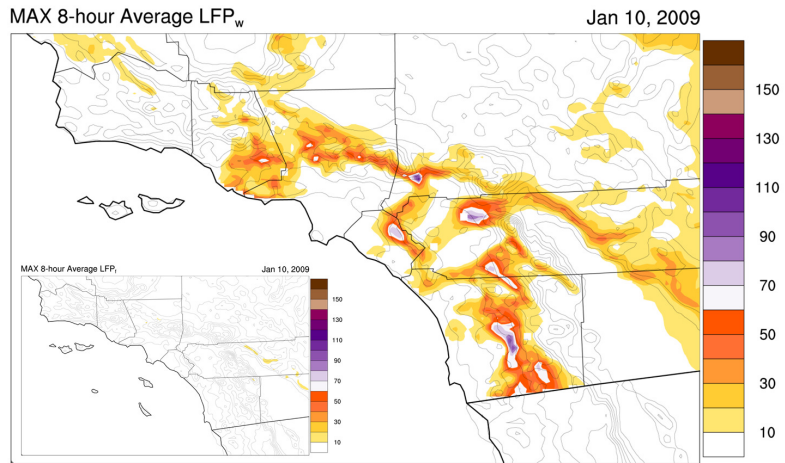


FIG. 8: Average LFP<sub>w</sub> (large) and LFP (lower left) from 8am to 3pm during a Santa Ana event on January 2009.

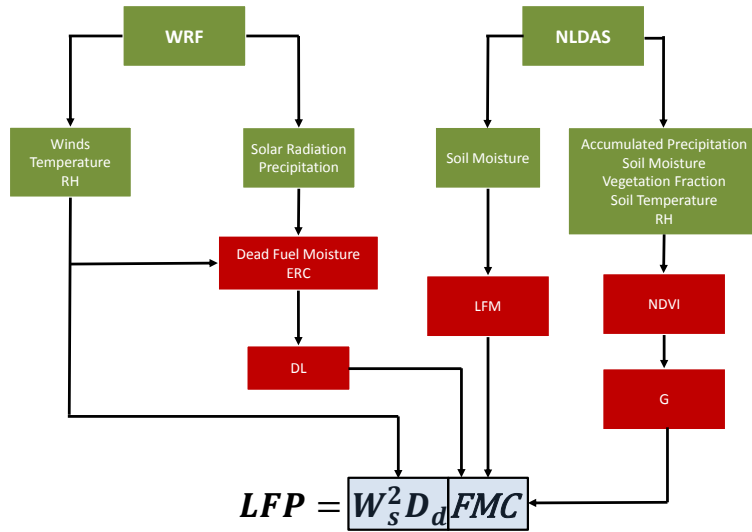


FIG. 9: Flowchart depicting operational LFP input models and datasets, derived variables and final LFP equation.

12 AM	1 AM	2 AM	3 AM	4 AM	5 AM	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	12 PM	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM	11 PM
1								2								3							
4												5											

FIG. 10: Time periods over which  $LFP_w$  is averaged.



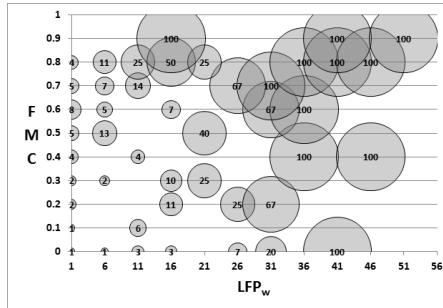


FIG. 11: Using historical fire occurrence data between 1992–2011, we show the relationship between binned FMC,  $LFP_w$  and fire activity for zone 1. Tickmarks indicate starting bin values for both FMC (bin interval of 0.099) and  $LFP_w$  (bin interval of 5). Bubble size indicates the conditional probability for an ignition to meet or exceed 100 hectares. For instance, 100% of fires which ignited during conditions characterized with  $FMC \geq 0.7$  and  $LFP_w \geq 36$  grew into large fires.

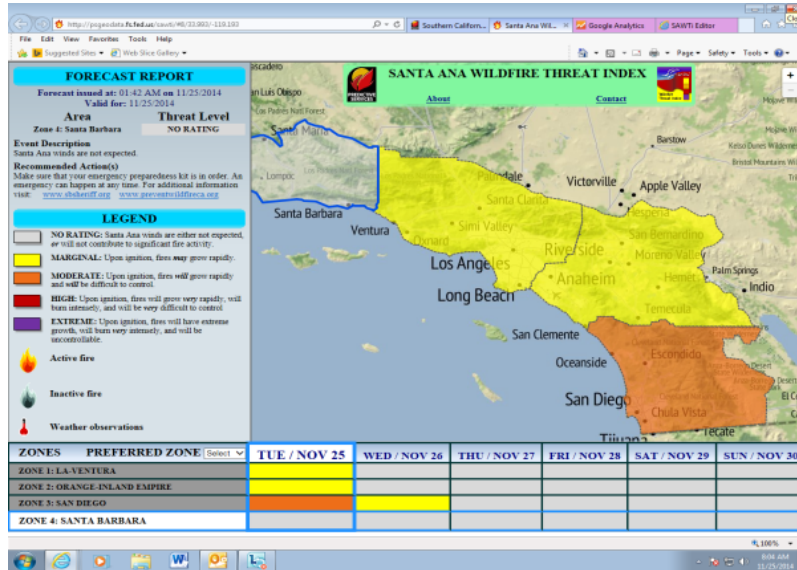


FIG. 12: Online operational SAWTI product.

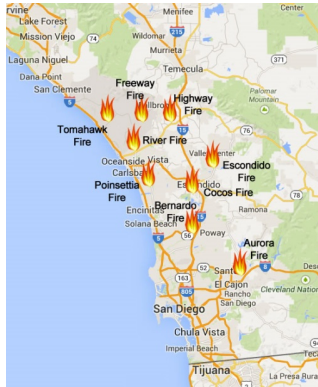


FIG. 13: Map of active fires (icons) on May 14, 2014 across San Diego County.

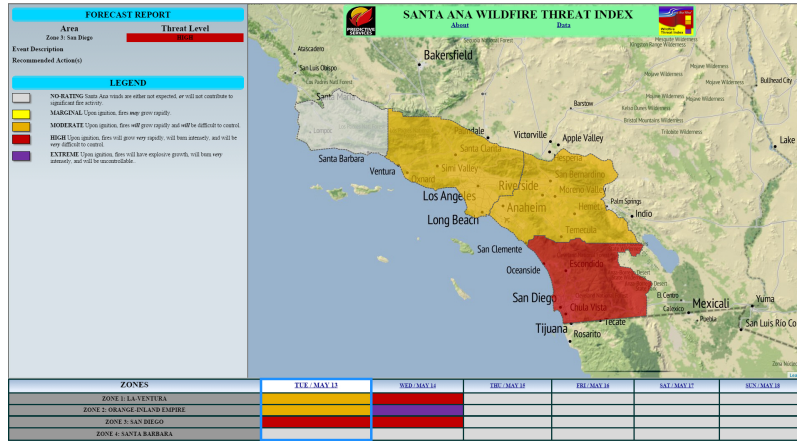


FIG. 14: SAWTI (in beta test) during May 14-15, 2014.

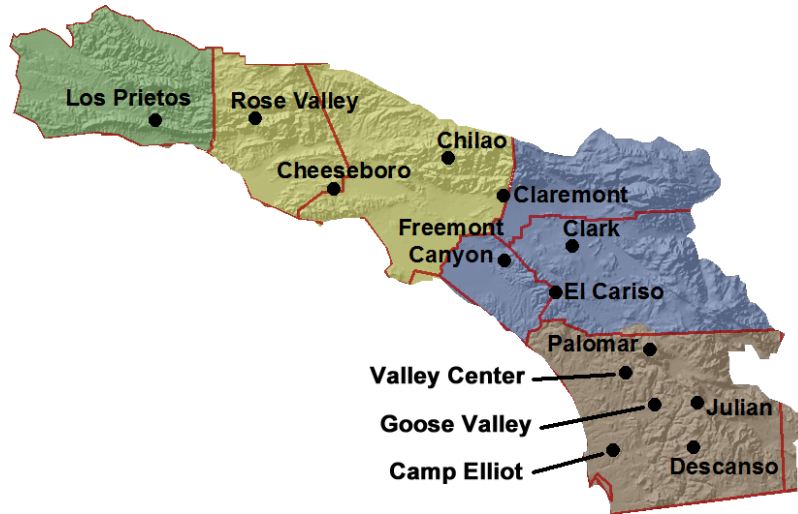


FIG. 15: RAWS used to validate WRF DFM and ERC.

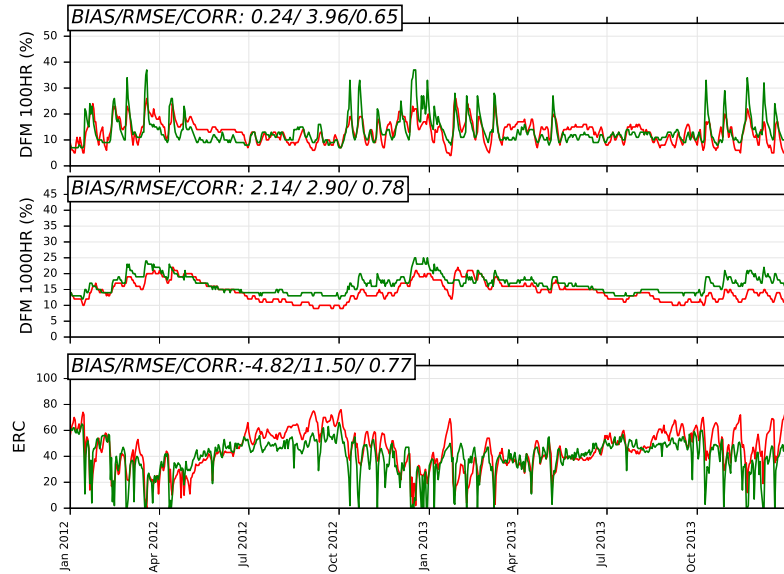


FIG. 16: RAWS (red line) and closest WRF gridcell (green line) timeseries of 100 (top) and 1000 hr (middle) dead fuel moisture and ERC (bottom row) spanning January 2012 through December 2013 for Goose Valley. WRF output coincides with RAWS 1300 LST measurements. Each plot is annotated with WRF output bias, RMSE and Spearman correlation.

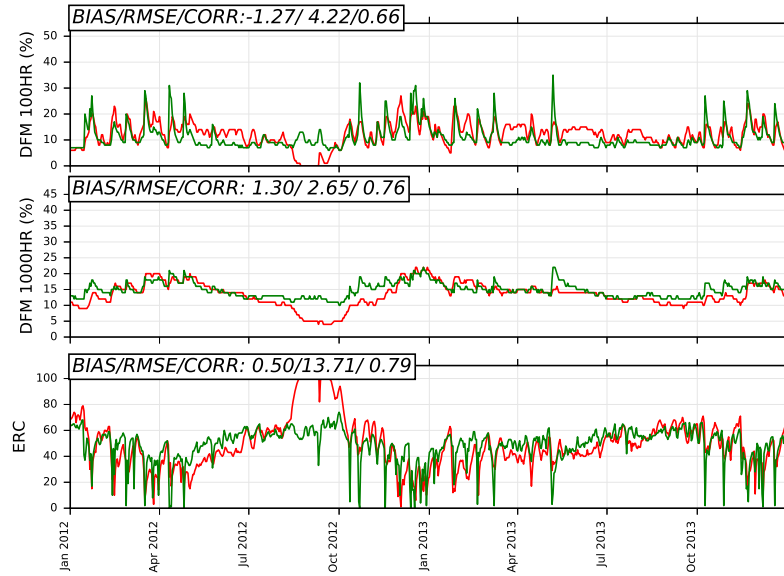


FIG. 17: Same as figure 16 except for Claremont RAWS.

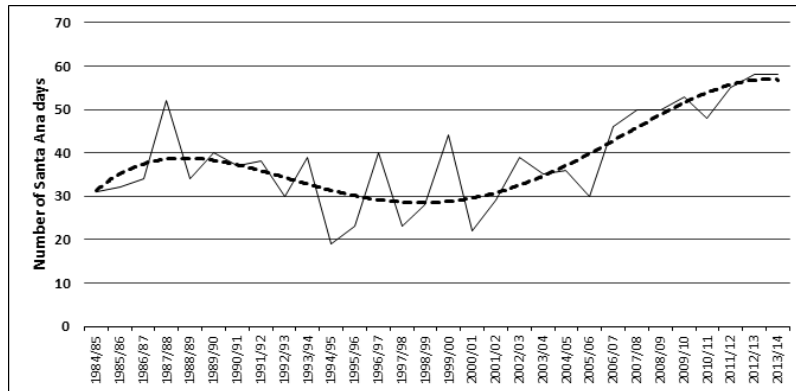


FIG. 18: Number of Santa Ana wind days per rain year (July 1 through June 30) for years spanning 1984–2014 (solid black line). Dashed line is a polynomial fit to the data which helps depict the longer-time period trends.



Attachment for Question 1a\_SDGE Potential Climate Change Impacts

**Climate Change and the Energy Sector**

# **San Diego Gas & Electric**

**Regional Energy Sector Vulnerabilities and Resilience Strategies**

## **Partnership for Energy Sector Climate Resilience**

Part I. Vulnerability Assessment

February 2016

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## Introduction

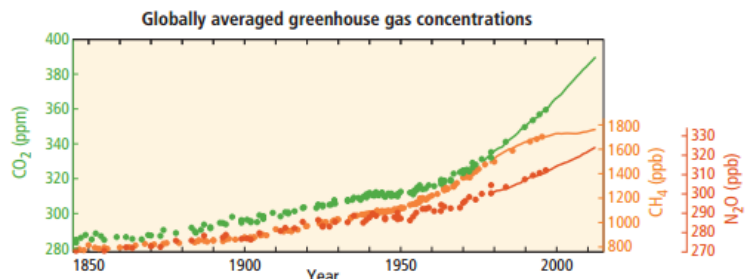
The Southwestern United States is characterized by mild coastal climates, arid inland regions, and mountain ranges that store critical water supplies to feed the growing population through the dry summer months. Historically, this area has been prone to many weather-related impacts that are projected to continue and intensify in the future, including:

- Increasing temperatures.
- Increased susceptibility to drought due to less frequent storm activity.
- Heavier rainfall in storms that do occur.
- Longer and more severe fire seasons.
- Rising sea levels.

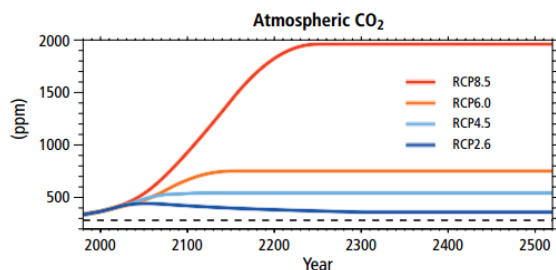
These factors, which are discussed in greater detail below, are projected to have large impacts on the population, including the energy sector. Weather conditions have been noted to play a significant role in the safe and reliable delivery of gas and electricity to customers. As the climate evolves, the changes in temperature, rainfall patterns, wildfire frequency, and sea level rise will bring new challenges to the energy sector that may expose vulnerabilities unseen in past decades. The sections to follow will discuss the projected impacts of climate change on the San Diego region and will identify potential vulnerabilities in the generation and delivery of gas and electricity as described by the Department of Energy (DOE), United States Environmental Protection Agency (EPA), and employees of San Diego Gas & Electric.

### Background Information

According to the Intergovernmental Panel on Climate Change (IPCC), the leading international body for the assessment of climate change composed of thousands of scientists from around the world, concentrations of greenhouse gases in the atmosphere have reached levels that are unprecedented in at least the last 150 years, as shown in Figure 1. The concentrations of carbon dioxide, methane, and nitrous oxide have all increased since 1850, with the greatest growth in carbon dioxide emissions recorded in the last 40 years. While oceans and soils have been noted to absorb some of these emissions, around 40% of the carbon dioxide released through human production is estimated to linger in the atmosphere despite a growing number of mitigation policies across the globe. The IPCC states that it is extremely likely that these emissions, in addition to other anthropogenic, or man-made, causes including urbanization of land, have contributed to more than 50% of the observed increases in global temperatures over the period 1951-2010 (IPCC 2014).



**Figure 1.** Atmospheric concentrations of the greenhouse gases carbon dioxide (green), methane (orange), and nitrous oxide (red) as determined from ice core data (dots) and direct atmospheric measurements (lines). Source: IPCC 2014.



**Figure 2.** Carbon dioxide emissions scenarios (Representative Concentration Pathways; RCPs) defined by the IPCC, including a high emissions scenario (red), a low emissions scenario (dark blue), and two intermediate scenarios (orange, light blue). Source: IPCC 2014.

use these four scenarios as a guide in the projected ranges of severity.

For the purposes of research and forecasting, the IPCC has compiled a series of anthropogenic emissions scenarios driven by population size, economic activity, lifestyle, energy use, land use patterns, technology, and climate policy. These scenarios are broken down into four basic types: one stringent scenario that assumes an eventual decrease in greenhouse gas emissions and keeps future global temperature increases below 3.6°F, one very high emissions scenario that reflects a fivefold increase in greenhouse gases by 2100, and two intermediate scenarios that fall in between the two extremes (IPCC 2014; see Figure 2 above). The results shown in the sections to follow

## Temperature

Global temperatures in each of the last three decades have been successively warmer than any preceding decade since 1850 (IPCC 2014). According to data from the National Climate Data Center (NCDC), the 12-month mean of average temperatures along the Southern California coast has increased at a rate of 0.3°F per decade since the 1890s (see Figure 3), with the most recent year ending in July 2015 soaring to nearly five degrees above the climatic mean.

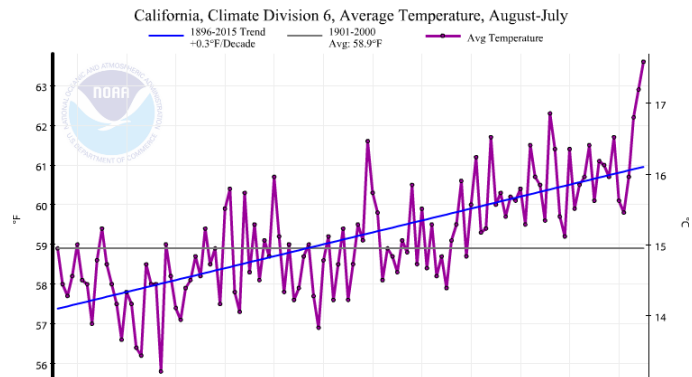


Figure 3. Average annual temperatures (August-July) along the Southern California coast from 1896-2015. Source: NOAA NCEI 2015.

### Maximum Temperature During July

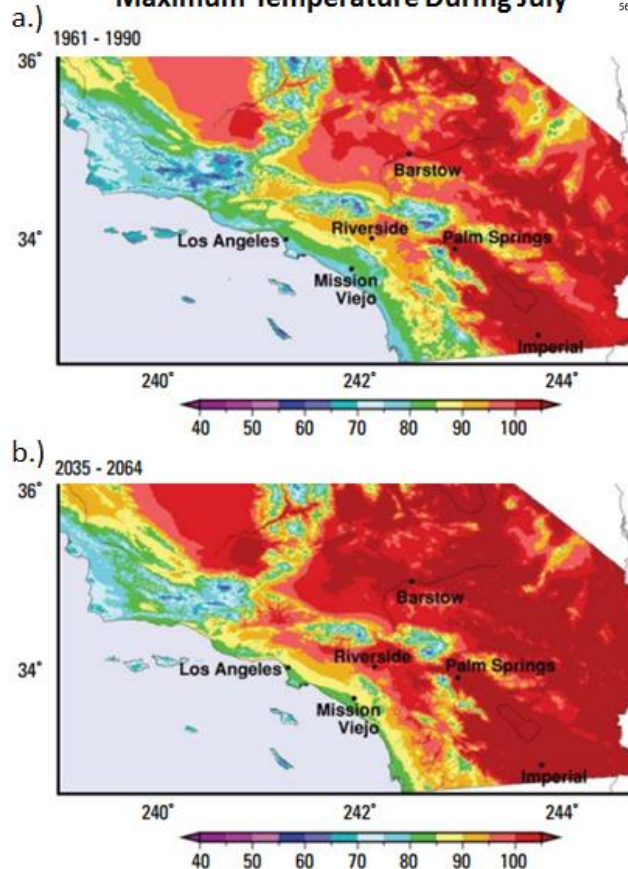


Figure 4. Average maximum July temperatures (a) observed in 1961-1990 baseline and (b) projected for 2035-2064. Source: Cayan 2009.

Confidence is high that temperatures will continue to increase through the next several decades. Most studies indicate that this warming will build over time with average temperatures increasing 2.5-5°F by 2050 and roughly 3-10°F by 2100, as shown in Table 1 below. Figure 4 shows that changes within the immediate coastal zones will be on the lower end of these scales due to their proximity to the ocean, which will be much slower to warm. Inland areas, particularly the foothills and mountains, are projected to experience more pronounced heat by the middle and end of the century (Cayan et al. 2013). Higher humidity across the San Diego region will lead to warmer overnight low temperatures, resulting in an increase in the overall average temperature year-round. However, impacts from heat and humidity are projected to be greatest in summer and fall (EPA 2015, Cayan et al. 2013, DOE 2015) with summertime heatwaves lasting up to two weeks longer than those in recent memory (USDA 2010, DOE 2015). Assuming the worst case emissions scenarios, it is also suggested that the conditions seen in what we currently consider to be the most significant heatwaves will increase in frequency and, by 2100, will become considered normal conditions for nearly a quarter of the year (USDA 2010).

A warming globe is also projected to lead to fewer cold snaps through the winter and spring (IPCC 2014, Cayan et al. 2013). The 21<sup>st</sup> century has already noted an increase in the number of freeze-free days across the Southwest compared to the 1901-2000 average, with 17 fewer days per year measuring temperatures below 32°F between 2001 and 2010 (Cayan et al. 2013). This number is projected to double by mid-century (Cayan et al. 2013).

	2050	2100
<b>Temperature/Heat Wave Projections</b> <ul style="list-style-type: none"> <li>• San Diego Foundation/SCRIPPS</li> <li>• DOE</li> <li>• EPA</li> <li>• USGCRP</li> </ul>	<ul style="list-style-type: none"> <li>• +3.1°F average temperature rise in San Diego, 7 times as many days of extreme heat per year</li> <li>• 10-25 more extremely hot days per year, especially inland</li> <li>• +2.5-5.5°F in Southwest</li> <li>• +2.6-5.5°F in Southwest</li> </ul>	<ul style="list-style-type: none"> <li>• +3-10.5°F with 2-4 times as many heat waves</li> <li>• +3.5-8.5°F in Southwest</li> <li>• +3.8-10.2°F in Southwest</li> <li>• +3.8-10.2°F in Southwest</li> </ul>

**Table 1.** Compilation of temperature and heat wave projections from multiple sources for both 2050 and 2100.

### Temperature: Potential Vulnerabilities

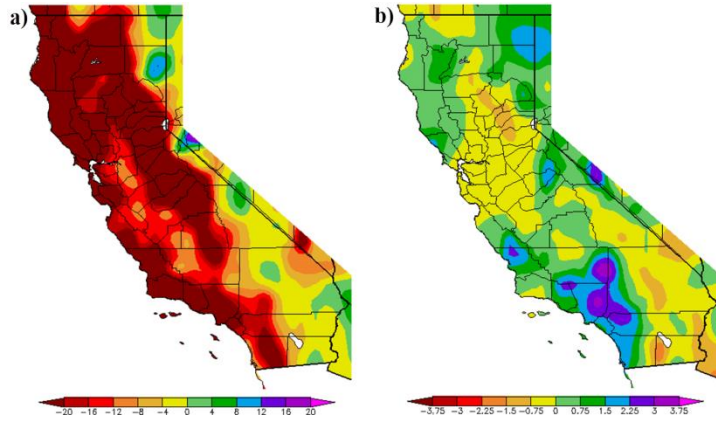
As temperatures rise, demand for energy to cool homes and businesses will likely follow suit, resulting in increases in peak electricity demand during the hotter summer months. Though the growing renewable energy market in the San Diego Gas & Electric service territory may help to dampen some of the impacts from the increased need for electricity, peak solar and wind generation occur at times that are offset from the daily peak in energy demand across the region. To make up for the difference, gas-fired generation would be needed on many days. This link would result in an increased demand for gas resources as well, potentially putting additional stresses on regional gas systems during prolonged heat waves (Kohls 2015).

Projections for increased humidity and warmer overnight temperatures would bolster the need for energy resources, but may also introduce issues with efficiency, capacity, and infrastructure lifetimes. The cooler nights tied to our current climate are necessary, particularly during the summer, to allow the electric infrastructure to cool and recycle itself. Increasing overnight temperatures would derail this process which, when met with the impacts driven by hot daytime temperatures, may lead to less efficient power production and reduced substation capacity (DeJulio 2015). Many transformers also house insulation that breaks down at accelerated rates under hot conditions. This factor, as well as the potential for transformer overloading during heat waves, may contribute to rapid shortening in the lifespan of transformers during the longer stretches of hot days and warm nights (DeJulio 2015). More persistent heat may also lead to thermal expansion of the electric infrastructure, triggering the potential for sagging transmission lines that could lead to damages and a higher number of outages (DOE 2015).

Other factors to consider as temperatures rise will be revisions of current company policies and the need to adapt to evolving regulations and standards set by government entities and the California Public Utilities Commission. Specific to San Diego Gas & Electric, planned outage programs to perform necessary work and infrastructure upgrades may become susceptible to more frequent cancellations during the summer months to avoid putting customers at risk without access to air conditioning and other cooling mechanisms during heat waves (Jones 2015). Statewide emissions regulations and restrictions on water use may also impact the availability of power imports during the hotter summer months (DOE 2015).

### Drought and Rainfall Patterns

The current highly-publicized California drought has been one for the record books. Though this dry stretch is documented to have begun in 2012, the 2001-2010 decade was the warmest and fourth driest on record for the Southwest region dating back to 1900, and the current 2011-2020 decade is on track to be even warmer and drier. Since the start of 2015 alone, California has experienced the fourth driest January-February-March period on record and has shattered records for the lowest Sierra snowpack with snow water levels of only five percent of the historical average on April 1. However, portions of the state have also broken significant rainfall records this year, including in the San Diego region where the second wettest May in 140 years of record keeping was documented



**Figure 5.** Precipitation departure from average in inches for (a) September 2012 through September 2015. (b) Summer 2015. Source: NOAA Western Region Climate Center.

and the measured 1.71 inches of rain in July equaled an accumulation greater than that of the past 100 Julys combined.

According to researchers, trends such as these will become more common across the Southwest into the next century (see Table 2). While many projections include more intense precipitation events with as much as 10-20% more rainfall from individual storms, storm activity is also forecast to become less frequent, leading to an overall decline in annual rainfall for the region (IPCC 2014, Cayan et al. 2010, McAfee et al. 2011, Cayan et al. 2013). The largest shortfalls are predicted to come during the winter months

	2050	2100
<b>Rainfall Pattern Projections</b> <ul style="list-style-type: none"> <li>San Diego Foundation/SCRIPPS</li> <li>DOE</li> <li>EPA</li> <li>USGCRP</li> </ul>	<ul style="list-style-type: none"> <li>8% more rainfall during large storms, 16% fewer rainy days</li> <li>Number of days of &lt;0.03mm rain will increase by 5-25 per year</li> <li>N/A</li> <li>Up to 16% more rain in winter, but as much as a 22% decline in summer rainfall</li> </ul>	<ul style="list-style-type: none"> <li>10-20% more intense rainfall</li> <li>3-12% less precipitation</li> <li>15-35% less precipitation</li> <li>Up to 23% increase in winter precip, but up to 24% decline in summer rainfall</li> </ul>
<b>Drought Projections</b> <ul style="list-style-type: none"> <li>San Diego Foundation/SCRIPPS</li> <li>DOE</li> <li>USGCRP</li> </ul>	<ul style="list-style-type: none"> <li>12% decrease in runoff and streamflow</li> <li>N/A</li> <li>Water volume reduction of up to 34% in Sierra snowpack</li> </ul>	<ul style="list-style-type: none"> <li>50-75% loss of April 1 snowpack and 1.5-2.5 times more critically dry years</li> <li>Snowpack decrease of up to 43% in California</li> <li>Water volume reduction of up to 57% in Sierra snowpack</li> </ul>

**Table 2.** Compilation of rainfall pattern and drought projections from multiple sources for both 2050 and 2100.

when more than 50% of the annual precipitation typically falls in Southern California. Due to the increasing temperatures discussed above, storms that do occur will be warmer, leading to higher snow levels that will, when combined with the projected shortfalls in annual precipitation, result in an overall reduction in the Sierra snowpack that may fuel prolonged periods of drought

across the state. In fact, several projections call for a significant increase in the number and duration of extreme drought events from 2050-2100 with the most severe dry spells extending beyond 5 years and, in the most extreme cases, persisting for more than a decade (Cayan et al. 2010).

More uncertainty exists in predictions of the summer monsoon and tropical activity in the Southwest. The year-to-year variability in summer precipitation generated by these events is dependent on many large and smaller scale processes, including sea surface temperature patterns (i.e. El Niño/La Niña), topography, and daily weather features. However, the global climate models focus on broader scale features and are unable to fully resolve the regional day-to-day processes (Cayan et al. 2013). In addition, more research is needed to be able to fully understand and predict El Niño and La Niña episodes and their influence on the monsoon.

**Drought and Rainfall Patterns: Potential Vulnerabilities**

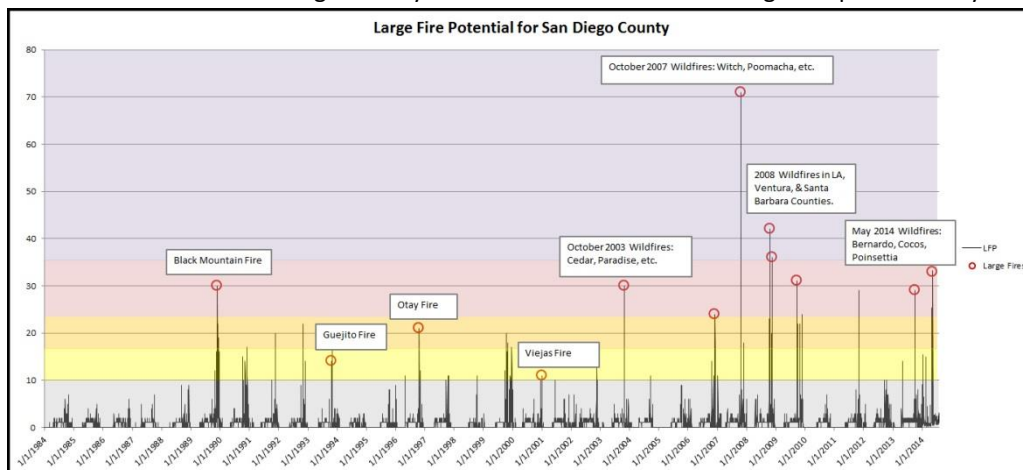
The more intuitive impacts from more severe and longer lasting droughts include less water available for cooling of the electric equipment, which would eventually have impacts on generator efficiency, and limited availability of water resources for the ongoing major projects and construction (DeJulio 2015). However, extensive drought conditions would also impact the underground gas pipelines in the region. Corrosion of the gas lines is prevented

through cathodic protection. In this process, a small charge is introduced to the pipeline and the water in the soil acts as a current conducting material. Without the water to complete the circuit, the cathodic protection is lost and the pipelines become more susceptible to corrosion, thus potentially shortening the lifespan of the gas infrastructure (Kohls 2015). A lack of groundwater in our most recent drought has also caused subsidence of the land in some parts of the state. If drought conditions worsen as projected, subsidence in dry areas may eventually damage pipelines used for import into the San Diego region that would reduce the availability of gas products (Kohls 2015).

Damages may also be incurred on gas and electric infrastructure during heavy precipitation events. When combined with the complex topography across the San Diego Gas & Electric service territory, fast accumulations of heavy rainfall can lead to mudslides and landslides that can scour the soil and potentially expose or damage the gas and electric infrastructure (DOE 2015, Kohls 2015). The increase in heavy rainfall events may also lead to inundation that could produce underground electric outages, while runoff and localized flooding may lead to erosion around electric infrastructure (DeJulio 2015). Also, changes to the frequency and severity of the storms may result in delays in the repair and maintenance of the infrastructure, leaving customers susceptible to longer outages (DeJulio 2015).

## Wildfire

Between January 1<sup>st</sup> and December 1<sup>st</sup> of 2015, 6,227 fires were reported across the state of California with a burn area totaling 307,592 acres. This was an increase of 1,985 fires and 116,321 acres burned during the same period in 2014, and stands at 140% and 281% of the 5-year averages of fires and acres burned, respectively (CAL FIRE 2015). While these numbers are exacerbated by the current four-year stretch of drought conditions, data ranging back to 1984 across San Diego County confirms that the number of high fire potential days each year has increased



**Figure 6.** Large fire potential for San Diego County, calculated using a combination of weather and fuels conditions. Larger values indicate higher fire potential. Labels and red circles indicate observed large fires in San Diego County.

since the early 2000s (see Figure 6). These trends are projected to continue as a combination of factors leads to increases in both fire season duration and severity through the end of the century (Melillo 2014, Kent 2015, CEP 2014).

A 2013 study done by the National Oceanic and Atmospheric Administration (NOAA) National Environmental Satellite, Data, and Information Service (NESDIS) group found that the effects of climate change will not significantly alter the frequency of Santa Ana wind events, which typically occur 2-5 days per month between October and March and have contributed to the growth of several of the largest fires in Southern California history. However, due to overall warming across the region, Santa Ana winds are likely to bring higher temperatures and lower humidity that will increase the fire potential with each event (Kunkel et al. 2013). Because Santa Ana wind events typically deliver the warmest conditions to the coastal communities, increases in fire potential may also extend to the coastal canyons and wildland areas that historically have not been as high of a wildfire concern. The warmer temperatures are also expected to enhance evaporation and transpiration even outside of Santa Ana events, which will deplete fuel moistures at faster rates. When coupled with longer dry



periods, increases in tree mortality due to drought, and increased warmth, this will result in longer fire seasons across the Southwest (Kent 2015, Westerling et al. 2006).

Though the general consensus is that fire seasons will lengthen and become more severe through the coming century, there are still several

	2050	2100
<b>Wildfire Projections</b>		
<ul style="list-style-type: none"> <li>San Diego Foundation/SCRIPPS</li> </ul>	<ul style="list-style-type: none"> <li>Longer and more extreme fire seasons</li> </ul>	<ul style="list-style-type: none"> <li>Probability of large fires in SoCal could increase by 30%</li> </ul>

**Table 3.** Wildfire projections for both 2050 and 2100. Many studies did not focus on wildfire impacts specific to Southern California and, thus, were not included.

unknowns that may alter fire behavior including shifts in vegetation type and the rebound rates of fuels in burned areas (Kent 2015, Westerling et al. 2006). It has been suggested that some vegetation types will be unable to adapt to the temperature increases, which would initially lead to an ample supply of dead fuels to carry fire, but would eventually result in a decline in fuels coverage unless the vegetation was phased out by species more apt to handle the hotter temperatures (Kent 2015). In addition, assuming the fires fully consume the fuels, increases in fire activity will eventually become limited until enough vegetation can grow back to support fire growth (Kent 2015).

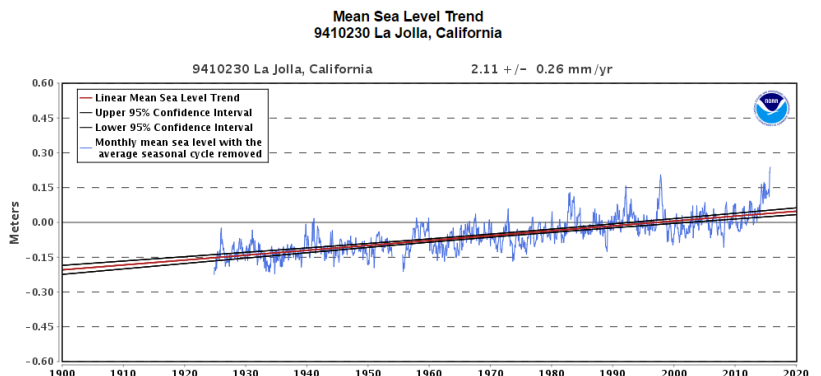
### Wildfire: Potential Vulnerabilities

Wildfire has been identified as one of the greatest weather-related risks to San Diego Gas & Electric, due to the region’s complex topography, lack of summer and early fall rains, and susceptibility to dry Santa Ana winds that can accelerate fire growth. It was this combination of factors that led to the Cedar Fire of 2003 and the Witch Fire of 2007 – both of which rank among the top 10 largest wildfires in California history – that spread across San Diego County and had large impacts to the utility. Because of the known wildfire risk and the potential impacts on utility operations, SDG&E has identified the locations at greatest risk for fire growth within the service territory and instituted a process to make the electric system more resilient to wildfires that includes replacing wooden poles with steel, installing new technologies to make the electric grid more resilient to fire and building upon a robust vegetation management program to keep trees and brush clear of power lines.

Despite the proactive approach to mitigating fire risk, increases in temperature and prolonged periods of drought in the decades to come will likely lead to high risk fire areas expanding from the foothills and mountains into the lower elevation coastal canyons and wildland interfaces that were previously considered at lower risk for fire growth. This would result in the potential for more damaged or destroyed wooden poles with any fires that occur and may even cause household impacts if the fires run up the canyons into densely populated neighborhoods (Kohls 2015). Projections for longer fire seasons also bring the potential for an increased number of planned work cancellations due to high fire concerns, including government-issued restrictions in national forestland.

## Sea Level Rise

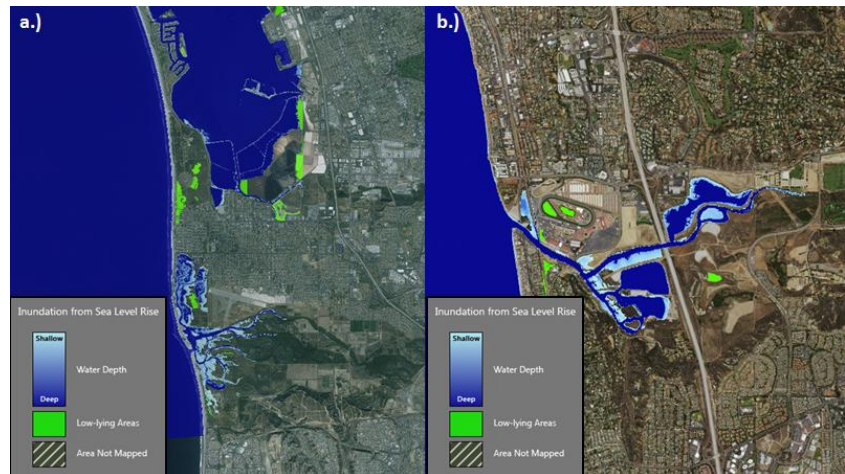
Oceans cover roughly two-thirds of the globe and play a large role in regulating the earth’s temperatures. Recent studies have shown that the oceans are also absorbing 90% of the heat trapped by greenhouse gases in the atmosphere (Melillo et al. 2014). As the water warms, it expands in a process called thermal expansion, resulting in sea level rise for coastal communities. Sea levels are also impacted by the melting of glaciers and ice sheets as global temperatures rise (Melillo et al. 2014, IPCC 2014). Data from tide gauges around the world show that the average global sea level has risen 7-8 inches over the past century



**Figure 7.** Measured monthly mean sea level at Scripps Pier with the normal seasonal cycle removed. Source: NOAA 2013.

(IPCC 2014). However, since measured increases at individual tide gauges are largely dependent on the surface wind direction, location of the warmer water and the direction of the currents carrying the melted ice, sea level rise has not been uniform around the world. Local data from Scripps Pier shown in Figure 7 above indicates that water levels have risen 8.28 inches in the past 100 years with an average increase of 2.11 millimeters per year (NOAA 2013). This is consistent with the eight inch rise in sea level in the last century reported at the San Francisco tide gauge (CCC 2015).

Uncertainties in the levels of greenhouse gas emissions and their impacts on global temperatures through the next century lead to wide ranges of potential sea level rise scenarios. The general consensus is that by 2050 the California coast will see a rise of as few as five inches, assuming a low emissions scenario, to as high as two feet (see Table 4 below) when compared to the similar base state sea levels of 1990 and 2000. Assuming the worst case scenario of two feet, mapping resources indicate that shallow water would cover portions of Imperial Beach and Border Field State Park while low lying areas of the Del Mar Fairgrounds would see some inundation from a daily high tide, as seen in Figure 8a and 8b, respectively. These impacts would be exacerbated by storm surge and King Tides, which would draw water further inland and worsen coastal erosion (Porter et al. 2011). In addition, thermal expansion of the water during strong El Niño events has been known to increase local sea levels, as shown in Figure 7 by spikes in the Scripps Pier mean sea level in 1982-83, 1997-98, and 2015, which may also add to the coastal impacts when such events occur in the future.



**Figure 8.** Projections of two feet of sea level rise at (a) Imperial Beach and Border Field State Park and (b) Del Mar Fairgrounds. Projections are base state and do not include inundation due to high tide or storm surge. Source: NOAA 2015.

Uncertainty is high in projections for 2100, when the range of sea level rise possibilities extends from increases of six to 79 inches (see Table 4 below) depending on the emissions scenario. Recent studies indicate that using the lowest emissions scenarios, melting small mountain glaciers, and accounting for thermal expansion of the oceans results in 11 inches of global sea level rise without taking into account the melting of the Greenland and Antarctica ice sheets (Melillo et al. 2014). Therefore, these studies suggest that the lowest reasonable estimate will be one foot of global sea level rise by 2100. As discussed before, this will not be a uniform rise around the world, though it is suggested that about 70% of coastlines will experience sea level change within  $\pm 20\%$  of the global mean (IPCC 2014). The greatest impacts to this rise will, again, be witnessed during high tides and storm events.

	2050	2100	Comments
<b>Sea Level Rise Projections</b> <ul style="list-style-type: none"> <li>San Diego Foundation/SCRIPPS</li> <li>DOE</li> <li>EPA</li> <li>USGCRP</li> <li>NRC</li> <li>IPCC</li> </ul>	<ul style="list-style-type: none"> <li>5-24 inches</li> <li>N/A</li> <li>10-22 inches</li> <li>N/A</li> <li>5-24 inches</li> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>6-30 inches</li> <li>17-66 inches</li> <li>30-74 inches</li> <li>7-79 inches</li> <li>16-66 inches</li> <li>15-28 inches</li> </ul>	<ul style="list-style-type: none"> <li>Relative to 2000 sea level</li> <li>Relative to 2000 sea level</li> <li>Relative to 1990 sea level</li> <li>Relative to 1990 sea level</li> <li>Relative to 2000 sea level</li> <li>Relative to 1985-2005 baseline</li> </ul>

**Table 4.** Compilation of sea level rise projections for the Southern California coast from multiple sources for both 2050 and 2100.

**Sea Level Rise: Potential Vulnerabilities**

The San Diego Gas & Electric service territory spans more than 80 miles of coastline that, according to the projections outlined above, will become susceptible to the rising oceans in the years to come. While research of increasing sea levels has been included in the planning process for new coastal facilities, including the South Bay Substation along the San Diego Bay that was built as high as 21 feet above sea level in some areas to account for the rising seas, low-lying substations and underground facilities built before sea level rise specifications were taken into account would remain at risk of flooding, particularly during storm surges and high astronomical tides (DeJulio 2015). These areas would become more susceptible to outages due to flooding, and accessibility issues caused by the inundation may result in crews being unable to make quick repairs, leading to the potential for prolonged outages (DeJulio 2015). Similar issues arise with the underground gas facilities in coastal regions that the rising sea levels may eventually completely cover. Additional concerns are that the inundation of salt water will increase corrosion of the gas pipelines that run parallel to the coast (Kohls 2015).

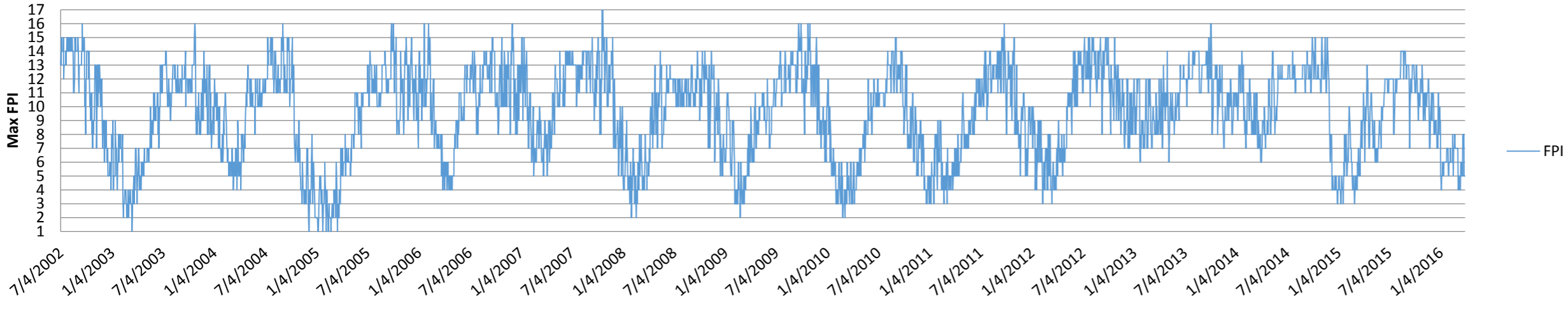
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Attachment for Question 2a\_Copy of Historic\_FPI\_2002-2016

### Daily Max Fire Potential Index for the SDG&E Service Territory



For the period July 4, 2002 - July 4, 2015

FPI	Total Days	Days/year
Normal (1-11)	3167	244
Elevated (12-14)	1469	113
Extreme (15-17)	113	9

Date	ME	RA	EA	NE	OC	NC	BC	CM	MAX
7/4/2002	13	13	9	9	8	8	8	7	13
7/5/2002	14	14	11	11	9	9	10	10	14
7/6/2002	13	13	9	9	7	7	8	8	13
7/7/2002	15	15	9	9	8	8	7	8	15
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Wind Scale	Average number of days per year
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5 to 9	2
10 to 14	67
15 to 19	193
20 to 24	69
25+	34

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3/27/2013	10	10	10	10	12	12	16	16	16
3/28/2013	10	10	10	10	12	12	15	15	15
3/29/2013	9	9	9	9	12	12	15	15	15
3/30/2013	14	14	14	14	14	14	15	15	15
3/31/2013	13	13	13	13	18	18	17	17	18
4/1/2013	16	16	16	16	17	17	18	18	18
4/2/2013	10	10	10	10	12	12	14	14	14
4/3/2013	13	13	13	13	16	16	18	18	18
4/4/2013	12	12	12	12	15	15	14	14	15
4/5/2013	10	10	10	10	13	13	17	17	17
4/6/2013	10	10	10	10	12	12	18	18	18
4/7/2013	9	9	9	9	14	14	17	17	17
4/8/2013	18	18	18	18	15	15	24	24	24
4/9/2013	12	12	12	12	14	14	20	20	20
4/10/2013	13	13	13	13	18	18	16	16	18
4/11/2013	15	15	15	15	13	13	18	18	18
4/12/2013	12	12	12	12	13	13	14	14	14
4/13/2013	9	9	9	9	10	10	21	21	21
4/14/2013	10	10	10	10	9	9	18	18	18
4/15/2013	14	14	14	14	13	13	15	15	15
4/16/2013	14	14	14	14	14	14	20	20	20
4/17/2013	18	18	18	18	21	21	18	18	21
4/18/2013	17	17	17	17	18	18	25	25	25
4/19/2013	17	17	17	17	15	15	21	21	21

4/20/2013	12	12	12	12	13	13	15	15	15
4/21/2013	9	9	9	9	13	13	16	16	16
4/22/2013	10	10	10	10	14	14	16	16	16
4/23/2013	10	10	10	10	12	12	20	20	20
4/24/2013	8	8	8	8	12	12	22	22	22
4/25/2013	12	12	12	12	14	14	15	15	15
4/26/2013	15	15	15	15	14	14	17	17	17
4/27/2013	10	10	10	10	12	12	22	22	22
4/28/2013	10	10	10	10	12	12	22	22	22
4/29/2013	8	8	8	8	13	13	20	20	20
4/30/2013	12	12	12	12	13	13	15	15	15
5/1/2013	13	13	13	13	12	12	24	24	24
5/2/2013	9	9	10	10	16	16	34	34	34
5/3/2013	9	7	8	8	10	10	15	15	15
5/4/2013	8	9	8	8	10	10	17	17	17
5/5/2013	7	8	11	12	12	12	17	17	17
5/6/2013	8	9	12	11	14	14	16	16	16
5/7/2013	9	9	12	11	13	13	17	17	17
5/8/2013	8	10	9	9	11	11	11	11	11
5/9/2013	9	7	9	9	11	11	12	12	12
5/10/2013	8	7	9	9	11	11	13	13	13
5/11/2013	9	8	9	8	11	11	13	13	13
5/12/2013	10	8	9	8	12	12	13	13	13
5/13/2013	11	7	10	10	12	12	12	12	12
5/14/2013	8	8	10	9	11	11	16	16	16
5/15/2013	7	7	8	9	9	9	14	14	14
5/16/2013	7	8	8	9	10	10	15	15	15
5/17/2013	9	8	9	11	9	9	16	16	16
5/18/2013	8	8	9	9	10	10	16	16	16
5/19/2013	8	8	8	9	10	10	12	12	12

Attachment to Question 6b\_Visual Inspection of Poles\_Feb2006



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<small>SUBJECT TITLE</small> VISUAL INSPECTION OF POLES AND EQUIPMENT		

**REVISION HISTORY**

Complete revision to bring Standard Practice up to current standards.

**1.0 PURPOSE**

1.1 This procedure provides guidelines for performing uniform detailed overhead visual inspection and corrective maintenance of the overhead distribution system.

**2.0 APPLICABILITY**

2.1 This standard applies to all qualified electric personnel performing scheduled inspections of equipment and installations on the electric distribution system. This standard is also applicable to Electric Supervisor and department Engineers directing inspection and maintenance work activity.

**3.0 DEFINITIONS**

- 3.1 **GFMS** -- Geographical Facilities Management System
- 3.2 **DIMS** -- Distribution Inspection & Management System
- 3.3 **DIMS/Online** -- Distribution Inspection & Management System, Online
- 3.4 **DIMS/MDT** -- Distribution Inspection & Maintenance System, Mobile Data Terminal
- 3.5 **C&O** -- Construction & Operation
- 3.6 **OCMP** -- Overhead Corrective Maintenance Program
- 3.7 **GMDT** -- Geographical Mapping Discrepancy Transmittal
- 3.8 **EGIM** -- Electric Geographic Information Management

**4.0 PROCEDURE**

4.1 POLICY STATEMENTS

- 4.1.1 Pursuant to GO 165, the overhead distribution system shall be inspected on a 5 year cycle. The detailed overhead visual inspection is necessary to verify condition of poles, equipment, conductors, and line hardware. This inspection is required in addition to other patrols that are made to identify system abnormalities. Qualified persons shall perform inspections.
- 4.1.2 Abnormal conditions found during the detailed overhead visual inspection shall be recorded in DIMS/MDT. See Attachment A "Definition of Overhead Condition Codes". Any conditions that could cause a failure, jeopardize service, or pose a safety hazard to the public or workers shall be repaired immediately.
  - 4.1.2.1 Make comments in the MDT comments field with any information that will further describe an abnormal condition and that will be useful for follow-up repairs.
  - 4.1.2.2 Abnormal conditions that are not repaired at the time of inspection will be recorded and assigned a pending condition in DIMS/MDT.

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4.1.3 Repairs should be made at the time of inspection whenever practical, or within the period of time specified by the CMP manual. Abnormal conditions that are repaired at the time of inspection will be recorded and assigned as a field-cleared condition in DIMS/MDT.

4.1.4 Once follow-up repairs are completed, the pending condition code will be changed and recorded as cleared in DIMS/Online by District personnel.

4.2 SPECIAL INSTRUCTIONS

4.2.1 Remove the old cal-grid pole number or other non-standard pole number on the pole. Replace the old cal-grid number on the pole with the number shown on the MDT/MAP. If the number is not shown in the MDT/Map or unknown, submit a GMDT form to Electric Geographic Information Management (EGIM). Do not remove temporary tagging on transmission poles.

4.2.2 Record in DIMS/MDT infractions caused by a foreign utility. If the District is not able to have the condition corrected, report the infraction for follow-up to Distribution Asset Management via an Investigation Order (I/O) form with the following information:

- Indicate problem
- What foreign utility is causing the problem? (Telephone, cable TV, etc)
- Location of pole (T.B. & street address) and pole number
- Was the foreign utility contacted? If so, when?

4.2.3 Report damaged non-SDG&E poles for follow-up to Distribution Asset Management via an investigating order (I/O) with the following information:

- Indicate problem
- Pole owner
- Location of pole (T.B. & street address) and pole number
- Was the owner contacted? If so, when?

**NOTE:** Do not record damaged non-SDG&E poles in DIMS/MDT.

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- 4.2.4 Inspect distribution equipment on transmission poles and record abnormal distribution equipment conditions, in the DIMS/MDT. (Intrusive wood pole inspections for Transmission poles will come into DIMS only if Distribution equipment is on the pole. Notify Transmission. For intrusive inspections only, put a note in the comment field "Transmission notified" and clear in DIMS as per Section 4.2.5). The infractions related to the OH visual inspections on the distribution equipment must remain pending until the repairs are completed, then cleared in DIMS/MDT. (See Figure 1)
- 4.2.5 Transmission poles are not required to be intrusively inspected by GO 165- only distribution poles. Hence, we do not need to record the intrusive inspections in DIMS. This applies only to the Z poles itself under PO IN by Osmose (not OHVI which is the distribution equipment on the pole). However, DIMS shows Transmission poles with distribution underbuild to notify Distribution personnel if a transmission pole with distribution underbuild is in need of repair. For intrusive inspections of transmission poles (PO-IN by Osmose only), notify transmission via e-mail that this came into DIMS, put in the comments that the Transmission Department was notified, date and clear in DIMS (see Figure 1).

**Figure 1**

Insp Dt	Insp Sub Typ	Insp Typ	Equip Desc	Map ID	District	ID:	Thom Bro	Cond	Location	Condition	Cond Stat	Insp ID	Purp	Clear Date	Clear By
19990823	OH	VI	Pole	162-1749	Metro	Z102022	1330D3	227	KENNEDY ST W/O	DAMAGED	F	39578	G	19990823	
19990823	OH	VI	Pole	162-1749	Metro	Z102022	1330D3	283	KENNEDY ST W/O	DAMAGED	F	39578	G	19990823	
20010613	PO	IN	Pole	162-1749	Metro	Z102022	1330D3	699	KENNEDY ST W/O	NO REPAIR	F	OSMOSE	G	20010613	OSMOS
20020806	PO	IN	Pole	162-1749	Metro	Z102022	1330D3	662	KENNEDY ST W/O	SOUND & EP	F	OSMOSE	G		
20020806	PO	IN	Pole	162-1749	Metro	Z102022	1330D3	626	KENNEDY ST W/O	DECAY, BE R	F	OSMOSE	G		
20010613	PO	IN	Pole	162-1749	Metro	Z102022	1330D3	632	KENNEDY ST W/O	TREATME	F	OSMOSE	G	20010613	

See 4.2.4 Distribution Equipment (OH VI)

See 4.2.5 Intrusive Inspection of Transmission Pole

ISSUED BY

**JAKE CARDENEZ /DARREN WEIM**

APPROVED BY

**J. D. JENKINS**



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4.2.6 Do not record damaged transmission poles or transmission equipment in DIMS/MDT when inspecting distribution equipment on transmission poles. Instead, report it to Electric Construction and Maintenance (Kearny) via an investigation order (I/O).

4.2.7 When the District cannot resolve an access problem, send a request for follow-up to Distribution Asset Management if access to our facilities is obstructed by a private property owner or foreign utility.

**4.3 INSPECTION PROCEDURES**

4.3.1 The detailed overhead visual inspection activities shall be scheduled by District Engineering and conducted by facility map in accordance with local needs.

4.3.2 All conditions found during the inspections that require follow-up repairs shall be recorded in DIMS/MDT. Corrective maintenance shall be performed when conditions can be repaired on site and recorded as field cleared in the DIMS/MDT. Preventive or corrective maintenance shall be performed for conditions that require follow-up repairs and recorded as pending conditions in DIMS/MDT.

4.3.3 Details regarding pending conditions should be clearly listed in the comment field.

4.3.4 The detailed overhead inspection requires all inspectors to walk-around the pole. The inspectors shall inspect for the condition of pole, hardware, equipment, clearances, conductors, and other general conditions.

4.3.4.1 Conditions of Pole. Check for:

- 4.3.4.1.1 Leaning pole
- 4.3.4.1.2 Broken, cracked, or rotten crossarms
- 4.3.4.1.3 Broken, cracked, or rotten poles (sound pole)
- 4.3.4.1.4 Unauthorized attachments
- 4.3.4.1.5 Washout or excavation around pole or anchor
- 4.3.4.1.6 Evidence of fire or other structural damage
- 4.3.4.1.7 Indication of excessive vehicle contact
- 4.3.4.1.8 Damaged stub poles

4.3.4.2 Conditions of Hardware and Equipment. Check for:

- 4.3.4.2.1 Broken, chipped or contaminated insulators
- 4.3.4.2.2 Pole switch indicating need for adjustment, grounds or repair
- 4.3.4.2.3 Indication of excessive transformer oil leakage or discoloration
- 4.3.4.2.4 Bulged or discolored capacitor units

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- 4.3.4.2.5 Broken or cracked bushing or fuse holder
- 4.3.4.2.6 Broken or cracked arrestor
- 4.3.4.2.7 Evidence of tracking or burning
- 4.3.4.2.8 Loose hardware or missing nuts
- 4.3.4.2.9 Guys missing or not installed properly
- 4.3.4.3 Condition of conductors. Check for:
  - 4.3.4.3.1 Slack conductors or unequal sag
  - 4.3.4.3.2 Indication of bullet nicks or vandalism
  - 4.3.4.3.3 Conductors not properly attached to insulator, including broken tie wires
  - 4.3.4.3.4 Damaged or burned connectors or jumpers
  - 4.3.4.3.5 Bare or wrapped services
- 4.3.4.4 Clearance and climbing space violations. Check for:
  - 4.3.4.4.1 Crane or other excessive height equipment operating in close proximity to lines
  - 4.3.4.4.2 Hazardous structures in close proximity to lines (i.e. television or radio antennas, campers, scaffolding etc)
  - 4.3.4.4.3 Inadequate ground clearance for primary, secondary and service wires
  - 4.3.4.4.4 Improper conductor clearances
- 4.3.4.5 General conditions. Check for:
  - 4.3.4.5.1 Damaged or missing keep off warning signs
  - 4.3.4.5.2 Missing high-voltage signs
  - 4.3.4.5.3 Damaged or missing visibility strips (State highways only)
  - 4.3.4.5.4 Damaged, missing or incorrect transformer station or pole identification
  - 4.3.4.5.5 Foreign objects in line (i.e. kites, palm fronds, balloons, etc.)
  - 4.3.4.5.6 Damaged, missing or poorly secured moldings or conduits
  - 4.3.4.5.7 Slack guys
  - 4.3.4.5.8 Damaged or missing guy markers (guards)
  - 4.3.4.5.9 Exposed grounds or neutrals on risers

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4.3.4.5.10 Pole steps below 8 ft (height).

4.3.4.5.11 Oil or compound leaks or contaminated potheads.

4.3.4.5.12 Broken or separated risers.

4.4 Report Tree Trim/Conditions

4.4.1 Primary, open wire secondary – send IO to vegetation management

4.4.2 SSC trees in secondary, service - record in MDT (heavy, immediate strain or abrasion)

4.4.3 Climbing space – Send IO to Vegetation Management where no bucket truck access

4.4.4 Guy grounded - record in MDT

4.5 Primary Metering Stations

4.5.1 Check ID tags, pole number, Primary metering station number

4.5.2 Meter number

4.5.3 High sign

4.5.4 With binoculars check all equipment for damage

4.5.5 Check conductors for damage

4.5.6 Check pole and crossarms for cracks and damage

4.6 ADDITIONAL CONSIDERATIONS and Constructions

4.6.1 All materials used in the repairs shall comply with the Overhead Construction Standards (Latest Edition).

4.6.2 A set of binoculars shall be used to inspect suspect equipment where necessary.

4.7 RECORDKEEPING

4.7.1 Districts are responsible for uploading and downloading electronic facility maps and inspection records daily into and from the DIMS/MDT.

4.7.2 Electric Distribution Standards will prepare monthly reports to assist Districts to monitor inspection and backlog goals, and distribution expenses.

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4.8 Quality Assurance

4.8.1 District supervision is responsible for auditing CMP inspections and follow up repairs to ensure quality. Each quarter, Overhead Visual (OHVI) cycle inspections shall be audited at a rate of 1% or a minimum of 5 poles, whichever is greater. Follow up repairs shall be audited at a rate of 1% of OHVI total infractions cleared each quarter.

4.8.2 Deficiencies should be noted on the quality assurance report form and discussed with employees. The district shall keep a copy of the quarterly report form for one year.

**5.0 ACCOUNTING**

- 5.1 OCMP OH Detail Inspection (Account 593.942)
- 5.2 OCMP OH Detail Follow-up Repairs (Account 593.943)
- 5.3 OCMP CPUC OH Inspection (Account 593.9421)
- 5.4 OCMP CPUC OH Follow-up Repairs (Account 593.944)
- 5.5 OCMP Intrusive Wood Pole Inspection (Account 593.945)

**6.0 REFERENCES**

- 6.1 Overhead Construction Standards Book (latest edition)
- 6.2 State of California General Order (G.O.) 95 - Rules for Overhead Electric Line Construction (latest revision)
- 6.3 DIMS - DIMS Manual (latest edition)
- 6.4 GO 165 – (CPUC Rule for Maintenance of Electric Distribution Facilities)

**7.0 ATTACHMENTS**

- 7.1 Attachment A - Definitions of Overhead Condition Codes
- 7.2 Attachment B – Quality Report Form

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**ATTACHMENT A**

Definitions of Overhead Condition Codes

The following tables are divided into three sections:

- 1.1 GO conditions (Infractions)
  - 1.1.1 These are conditions which must be corrected in the ten-month internal repair period, not to exceed the twelve month repair period governed by GO95.
- 1.2 Reliability conditions
  - 1.2.1 These are conditions which do not fall within the General Order, but are determined to affect system reliability and are repaired based on engineering evaluation or experience.
- 1.3 Discretionary conditions
  - 1.3.1 These are conditions, which are neither governed by General Order, nor are determined to have a significant impact on system reliability, and may be corrected at the discretion of the District.

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**Overhead GO Conditions**

Code	Description	GO 95 Requirements and Overhead Standards	Reactive Maintenance	Follow-up Maintenance	Ref.
26	Ground rods or studs missing	GO 128 Rule 36.5-C(2) allows conductors and equipment to be effectively grounded by connections at one or more locations to driven ground rods or other suitable grounding electrodes.		Follow-up fix if missing or corroded out; install new rod	SP602 OH 1002.1
096	Conduit damaged	Use this code if cable pole conduit is damaged		Follow-up fix by crew	
098	Conduit not strapped down	Use this code if conduit is not strapped down	Strap conduit	Follow-up fix by crew	
201	Pole steps too low	SDG&E Electric Standard sets minimum height at 7.5 feet.	Remove step(s) below 7.5 feet		OH363
203	Damaged/missing visibility strips	Delineators are required on all poles on state highways, within 12 feet of traveled roadway.	Install/replace visibility strips on state highways only.		OH208 OH217
206	Damaged/Missing Pole Hardware	GO 95 Rule 49.8 requires all pole line hardware to be galvanized, otherwise protected by a corrosion, resisting treatment or composed of corrosion resistant material. Use this code when hardware is damaged or missing or to replace damaged or depleted galvanized hardware.	If corrosion effects serviceability now or within cycle length or it is not built to standard, record as infraction.	Follow-up fix by crew; replace damaged hardware	OH390- OH396
207	Pole leaning badly	GO 95 Rule 47.3 & 48 require that loads imposed on poles be balanced. Pole being pulled over and leaning more than 10 degree from the vertical position shall be considered leaning badly. 10 degrees is equal to 7 feet off center for a 45' pole; however, this is adequate for all poles.		Follow-up fix by crew; install guy(s).	OH901

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**Overhead GO Conditions**

Code	Description	GO 95 Requirements and Overhead Standards	Reactive Maintenance	Follow-up Maintenance	Ref.
209	Foreign attachment/ unauthorized equipment	GO 95 Rule 34 prohibits antenna, signs, posters, banners, decorations, wires, lighting fixtures, guys, rope or any other equipment foreign to the purpose of OH electric line construction. Temporary attachments older than one year old are also prohibited	Remove foreign attachment if practicable and field clear	Follow-up by crew if truck is required to remove foreign attachments	OH225
219	Pole inaccessible	GO 95 Rule 31.2 requires that all supply system be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements." Inaccessible" occurs where there is a locked gate, animal, material stacked around pole or vegetation that prevent access to the pole. <u>Inspect after the cause of the inaccessibility is cleared.</u> For trees, record as 219 in MDT and send IO to Veg. Management	Fix on site if object causing this condition is removable	Record in DIMS as 219. Code 219 will <u>remain pending</u> until inspected. For trees/veg, use street address, leave door hanger for effected customers, for vegetation removal obtain signed removal card, quantity of trees, use abbreviation key.	SP602
228	Exposed conductor	GO 95 Rule 54.6. Use this code whenever there is uncovered vertical and lateral runs, broken or missing PVC conduit.		Follow-up fix by crew; replace PVC conduit	OH225
229	No Climbing / Working Space	GO 95 Rule 54.7 & OH Standard 251-261 require that there be no conflict or encroachment on the climbing and working space; however, GO 95 allows quadrant climbing space up through the communications level. For maintenance only, do not enter this code where there is quadrant-climbing space available below secondary and communications lines are attached to pole. Use this code only when climbing and working space infractions are caused by SDG&E. If caused by foreign utility use code 402. Refer to "climbing space diagrams".		Follow-up fix by crew. If caused by vegetation and no bucket truck access is available, send an IO to Vegetation Management or call the VM help desk when trimming is needed urgently.	OH225 OH251 OH255 OH261
230	Damaged ground molding	GO 95 Rule 54.6B requires that ground wires attached on the surface of wood poles and structures to be covered throughout their length by a suitable protective covering. Use this code if ground molding is broken and ground conductor is exposed.	Replace damaged ground molding.	Follow-up to electric supervisor for molding above conductors energized over 750V	OH393 OH 1002

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**Overhead GO Conditions**

Code	Description	GO 95 Requirements and Overhead Standards	Reactive Maintenance	Follow-up Maintenance	Ref.
231	Open/Damaged Ground	GO 95 Rule 52.7F requires equipment grounding. Use this code whenever the pole ground has been broken, burned through or cut.		Follow-up fix by crew	OH1002
234	Damaged/missing high voltage signs - 2 man	GO 95 Rule 51.6A requires marking the pole to no more than 40" below the lowest conductor of circuit(s) 750 volts or more for poles with no equipment or 6" below equipment. Place high signs on cross-arms on cable poles. Use this condition code where 2 or more linemen are needed to clear the condition.		Follow-up fix by crew	OH208
235	Damaged arrestor/insulator/ dead-end	Use this code if there is broken or chipped arrestor and insulator and if there is evidence of burning or flashover. Make further comments in the MDT comment box.		Follow-up fix by crew	OH1251 OH750 OH1247
236	Damaged/missing high voltage sign - 1 man	GO 95 Rule 51.6A requires marking the pole to no more than 40" below the lowest conductor of each circuit 750 volts or more for poles with no equipment or 6" below equipment. Use this code where a 1-man crew can be used to clear the condition.		Follow-up fix by crew	OH208
237	Oil leak	Use this code if there is visible oil leaking from any pole mounted electrical equipment. Refer to SP122 on follow-up requirements.		Follow-up fix by crew	SP122
238	Abandoned Facilities	GO 95 Rule31.6 requires that lines or portions of lines permanently abandoned shall be removed by their owners so that such lines do not become a hazard. Applies to pole and conductors or UG structures.		Follow SPM 200	GO95 Rule31.6
239	Idle Equipment	Use this code if equipment or hardware is no longer in use		Follow-up by electric supervisor	GO95 Rule31.6
240	Damaged cutout	Use this code if there is broken or chipped cutouts and if there is evidence of burning or flashover. Make further comments in the MDT.		Follow-up fix by crew	OH1240 OH1212
241	Damaged crossarm	Use this code if the crossarm is broken, if there is severe cracking, evidence of charring, burning, or severe tracking. Make further comments in the MDT.		Follow-up fix by crew	OH380 OH384
243	Damaged switch	Use this code if any part of the switch is damaged or broken, insulators, switch blades etc.		Follow-up fix by crew	OH1442 OH1444 OH1451 OH1220 OH1222 OH1228 OH1230

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DIVISION <b>DISTRIBUTION OPERATIONS</b>	DEPARTMENT <b>ELECT. DISTRIBUTION SERVICES</b>	1/26 <b>FEBRUARY 27,2006</b>
SECTION <b>OVERHEAD CORRECTIVE MAINTENANCE</b>		
SUBJECT TITLE <b>VISUAL INSPECTION OF POLES AND EQUIPMENT</b>		

**Overhead GO Conditions**

Code	Description	GO 95 Requirements and Overhead Standards	Reactive Maintenance	Follow-up Maintenance	Ref.
244	Damaged switch gang operator mechanism	Use this code if the switch gang operator mechanism is broken, bent or missing.		Follow-up fix by crew	OH 1228 OH 1271 OH 1230
246	Damaged SDG&E pole	Use this code if the pole is broken, or if the strength of the pole is questionable due to vehicular contact, severe cracking, shell rot, top rot, evidence at the ground line of butt rot, charred wood or severe tracking. Make further comments in the MDT. Do not turn in to Osmose for damage 8 feet above ground line. If already red or yellow tagged, contact Osmose contract administrator for follow-up.	For severe damage, contact Electric Supervisor for immediate temporary shoring	For SDG&E-owned pole, follow-up fix-notify Electric Supervisor. For foreign utility own poles, send IO to Joint Facilities (Do not record in DIMS).	SP601 OH225
254	Insufficient Clearance	GO 95 sets clearance requirements for various subjects. Refer to OH Standard for review of these requirements. Use this code when there is not adequate clearance or ground to conductor clearances caused by SDG&E except for low service drops (code 262). If caused by foreign utility use code 403.		Follow-up fix by crew	OH221 OH224 OH228 OH262 OH236 OH264 OH908 OH 1406 OH 1509 OH 1530 OH 1533
262	Low service drops	GO 95 rule 54.8B requires service drops above ground, buildings, etc., shall not be less than the following minimum clearances: <ul style="list-style-type: none"> <li>• over fences -2' (non-walkable), 8' (walkable)</li> <li>• over pedestrian walkways - 10' (residential), 12' (commercial)</li> <li>• over driveways - 12' (residential), 16' (commercial)</li> <li>• over thoroughfares - 18' (centerline), 16' (at curb)</li> </ul>		Follow-up fix by crew; notify customers affected	OH241 OH645 OH646

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**Overhead GO Conditions**

Code	Description	GO 95 Requirements and Overhead Standards	Reactive Maintenance	Follow-up Maintenance	Ref.
264	Bare/wrapped service	Use this code if the service conductor has evidence of fraying, or its insulation or weatherproofing is missing. Use this code also for open wire service that is wrapped or touching. Make further comments in the MDT.		Follow-up fix by crew;	OH225
266	Foreign objects	Use this code when kites, palm frond, balloons, tennis shoes, etc. are on the conductors.		Follow-up fix by crew; remove foreign objects	OH225
267	Damaged capacitor	Use this code when bushings show sign of damage, and cases are swollen or damaged due to foreign contacts.		Follow-up fix by crew	OH1301
268	Slack conductors	Use this code when overbuild has greater sag than the lower wires on the same span or when there's unequal sag of conductor(s) on the same span. Use this code also when lower (secondary) conductors sag. Make further comments in the MDT.		Follow-up fix by crew	OH225
269	Damaged conductors	Use this code if conductors are bent, or severely corroded. Make further comments in the MDT.	Notify electric supervisor for immediate repair for critical condition	Follow-up fix by crew	OH225
270	Damaged/ Missing Guy Marker	GO 95 Rule 56.9 requires guy guard to be securely attached to all anchor guys. Use this code when guy guard is twisted, bent, cut, unsecured or missing.	Replace damaged or install new guy marker		OH225 OH975 OH927
274	Guy grounded above insulator	GO 95 Rule 56.7B requires insulator to be installed in each anchor guy. Use this code when portion of guys above the insulator are grounded by trees, building, messenger, metal-sheathed cables or other similar objects. If condition is caused by trees, use code 328.		Follow-up fix by crew	OH909
276	Slack anchor guy	GO 95 Rule 56.2 requires where mechanical loads imposed on poles are greater than can be supported; additional strength shall be provided by the use of guys or other suitable condition. Use this code when an anchor guy is loose.		Follow-up fix by crew	OH225 OH920

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**Overhead GO Conditions**

Code	Description	GO 95 Requirements and Overhead Standards	Reactive Maintenance	Follow-up Maintenance	Ref.
277	Damaged guying	Use this code when strands are missing, broken, severely bent or corroded, when there's evidence of vehicular contact, when there's corrosion or damage to guy grips, anchors or hardware. Make comments in the MDT.		Follow-up fix by crew	OH925 OH928 OH961 OH966
278	Slack span guy	Use this code when any guy other than an anchor guy is loose.		Follow-up fix by crew	OH908
280	Damaged SDG&E stub poles	Use this code if the stub pole is broken, or if the strength of the pole is questionable due to vehicular contact, severe cracking, shell rot, top rot, evidence at the groundline of butt rot, etc.		Follow-up fix by crew	SP601 OH225
282	Bolt Covers Missing	Use this code whenever bolt covers are missing.		Follow-up fix by crew.	OH1145
283	Damaged/ Missing/ Incorrect Station Pole ID	Per SDG&E standards, use this code whenever the station identification, size, or pole number is damaged, missing or incorrect. Make further comments in the MDT.	Fix on site if damage. Replace old Cal-grid or other non-standard pole number. Use pole number shown on the map.	If pole number is unknown or missing, submit GMDT to EGIM. Follow-up fix	OH211 OH208
298	Infraction, No Applicable Code	Use this code to identify infraction conditions that do not have an existing code, but need immediate repairs. Provide comments in DIMS/MDT.		Follow-up fix by crew.	CMP manual
318	Trees/Veg in Primary 18" or closer	Use this code when trees are 18 inches or closer to primary conductors	For trees/ veg., use street address, leave door hanger for effected customers, for vegetation removal obtain signed removal card, quantity of trees, use abbreviation key.	Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk.	

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DIVISION <b>DISTRIBUTION OPERATIONS</b>	DEPARTMENT <b>ELECT. DISTRIBUTION SERVICES</b>	1/26 <b>FEBRUARY 27,2006</b>
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**Overhead GO Conditions**

Code	Description	GO 95 Requirements and Overhead Standards	Reactive Maintenance	Follow-up Maintenance	Ref.
319	Trees/Veg. Contacting Open wire secondary	Use this code when trees/veg is contacting open wire secondary pole to pole.	For trees/veg, use street address, leave door hanger for effected customers, for vegetation removal obtain signed removal card, quantity of trees, use abbreviation key.	Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk– 858-654-8608.	
320	Trim-Veg in 2ndry-SSC/Aerial Cable (P/P) Hvy /Immediate Strain or Abrasion	Use this code for Secondary SSC/Aerial Cable (Pole to Pole) with only immediate heavy strain or abrasion for which tree trim is recommended. Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk – 858-654-8608.	For trees/veg, use street address, leave door hanger for effected customers, for vegetation removal obtain signed removal card, quantity of trees, use abbreviation key.	Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk– 858-654-8608.	
321	Guard-Veg in 2ndry-SSC/Aerial Cable (P/P) Hvy /Immediate Strain or Abrasion	Use this code for Secondary SSC/Aerial Cable (Pole to Pole) with only immediate heavy strain or abrasion for which tree guard is recommended. Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk– 858-654-8608.	For trees/veg, use street address, leave door hanger for effected customers, for vegetation removal obtain signed removal card, quantity of trees, use abbreviation key.	Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk– 858-654-8608.	
322	Reroute-Veg in 2ndry-SSC/Aerial Cable (P/P) Hvy /Immediate Strain or Abrasion	Use this code for Secondary SSC/Aerial Cable (Pole to Pole) with only immediate heavy strain or abrasion for which a reroute is recommended. Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk– 858-654-8608.	For trees/veg, use street address, leave door hanger for effected customers, for vegetation removal obtain signed removal card, quantity of trees, use abbreviation key.	Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk– 858-654-8608.	
323	Guard-Veg in Service-(P/HSE) HVY/Immediate Strain or Abrasion	Use this code for Services (Pole to House) with only immediate heavy strain or abrasion for which tree guard is recommended. Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk– 858-654-8608.	For trees/veg, use street address, leave door hanger for effected customers, for vegetation removal obtain signed removal card, quantity of trees, use abbreviation key.	Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk– 858-654-8608.	

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DIVISION <b>DISTRIBUTION OPERATIONS</b>	DEPARTMENT <b>ELECT. DISTRIBUTION SERVICES</b>	1/26 <b>FEBRUARY 27,2006</b>
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**Overhead GO Conditions**

Code	Description	GO 95 Requirements and Overhead Standards	Reactive Maintenance	Follow-up Maintenance	Ref.
324	Slack-Veg in Service-(P/HSE) HVY/ Immediate Strain or Abrasion	Use this code for Services (Pole to House) with only immediate heavy strain or abrasion for which slacking the line is recommended. Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk- 858-654-654-8608.	For trees/veg, use street address, leave door hanger for effected customers, for vegetation removal obtain signed removal card, quantity of trees, use abbreviation key.	Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk- 858-654-8608.	
325	Reroute-Veg in Service-(P/HSE) HVY/ Immediate Strain or Abrasion	Use this code for Services (Pole to House) with only immediate heavy strain or abrasion for which reroute is recommended. Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk- 858-654-8608.	For trees/veg, use street address, leave door hanger for effected customers, for vegetation removal obtain signed removal card, quantity of trees, use abbreviation key.	Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk- 858-654-8608.	
326	Trim-Veg in Service-(P/HSE) HVY/ Immediate Strain or Abrasion	Use this code for Services (Pole to House) with only immediate heavy strain or abrasion for which tree trim is recommended. Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk- 858-654-8608.	For trees/veg, use street address, leave door hanger for effected customers, for vegetation removal obtain signed removal card, quantity of trees, use abbreviation key.	Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk- 858-654-8608.	
328	Guy Grounded By Trees/ Vegetation	GO 95 Rule 56.7B requires insulator to be installed in each anchor guy. Use this code when portion of guys above the insulator are grounded by tree or vegetation. Use code 274 if grounded by building, messenger, metal-sheathed cables or other similar objects. If vegetation below insulator causes heavy strain on down guy, send IO to Vegetation Management.	For trees/veg, use street address, leave door hanger for effected customers, for vegetation removal obtain signed removal card, quantity of trees, use abbreviation key.	Record in the MDT. Do not send in an IO. Call in emergencies to Vegetation Management Help Desk- 858-654-8608.	

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### Overhead GO Conditions

Code	Description	GO 95 Requirements and Overhead Standards	Reactive Maintenance	Follow-up Maintenance	Ref.
402	No Climbing Space Caused By Foreign Utility/Private Property Owner	GO 95 Rule 54.7 & OH Standard 251-261 require that there be no conflict or encroachment on the climbing and working space; however, GO 95 allows quadrant climbing space up through the communications level. For maintenance only, do not enter this code where there is quadrant-climbing space available below secondary and communications lines are attached to pole. Refer to "climbing space diagram". Use this code only when climbing and working space infractions are caused by Foreign Utility.		If caused by vegetation and no bucket truck access is available, send an IO to Vegetation Management or call the VM help desk when trimming is needed urgently. Record in DIMS and send an IO to Joint Facilities. Clear after IO sent. Do Not field clear.	OH 225 OH 51 OH 255 OH 261
403	Insufficient Clearance Due To Foreign Utility	GO 95 sets clearance requirements for various subjects. Refer to OH Standard for review of these requirements. Use this code when there is not adequate clearance or ground to conductor clearances caused by foreign utility. Service poles with two or more services with foreign utilities attached must have four feet separation. Poles with Only one service and foreign utility attached may have two feet separation. Use code 274 if not caused by foreign utility.		Record in MDT and send IO to Compliance Management. Do Not field clear.	OH221 OH224 OH228 OH262 OH236 OH264 OH908 OH1406 OH1509 OH1530 OH1533
481	Pole replacement from POIN	Use this code when a pole coded 682 or 683 for c-truss or fiber-wrap repair is determined by the Electric Supervisor to need replacement.		Use DIMS On-line Condition Entry tab, Follow-Up type, and enter as pending. The original date of the 682 or 683 code shall be the effective date for the new code 481. Add comments referring to the Osmose inspection code and then clear the Osmose POIN in the Clear Inspection screen.	

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**Overhead Reliability Conditions**

Code	Description	Overhead Standards	Reactive Maintenance	Follow Maintenance -up	Ref.
32	Pothead leaking	Use this code where the insulating gel is leaking from the pothead.		Turn in follow-up to electric supervisor	SP602
33	Pothead chipped/broken	Use this code where the pothead shows signs of cracks, chips or are broken.		Turn in follow-up to electric supervisor	SP602
150	No applicable code	Use this code to identify reliability conditions that do not have existing codes. Provide comments in DIMS/MDT.		Follow-up as required	
208	Tags missing (P/N sign)	SDG&E Electric Standards requires that when the primary phase and primary neutral cannot be distinguished, the primary neutral shall be identified by a "PN" sign.		Follow-up fix by crew; install 'PN' sign on primary neutral.	OH208
220	Guy Buried	Use this code when the anchor rod eye is buried or less than six inches above the ground. Install an anchor rod extension.		Follow-up fix by crew	OH927.1
227	Damaged/ Missing Warning Signs	OH Standards requires warning sign (Item 10) on poles with energized electrical facilities (secondary and above).		Fix on site	OH208.4
233	Standoff pin missing or damaged	Use this code when the standoff is damaged or missing.		Follow-up fix by crew	OH1145
438	Foreign utility not transferred to new pole	Use this code where SDG&E has installed a new pole and the communications utilities have not transferred off the old pole. Use code 238 where the communications facilities have been transferred.		Send an IO to Joint facilities and identify which communication utility has not transferred.	
600 Series	Intrusive Wood Pole Inspection (contractor)	Refer Intrusive Wood Pole Inspection Codes 601-699 in DIMS. To be entered only by Wood Pole Inspection Contractor.			

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<small>DIVISION</small> DISTRIBUTION OPERATIONS	<small>DEPARTMENT</small> ELECT. DISTRIBUTION SERVICES	<small>1/26</small> FEBRUARY 27,2006
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**Overhead Discretionary Conditions**

Code	Description	Overhead Standards	Reactive Maintenance	Follow-up Maintenance	Ref
006	Cable pole tag missing	Equipment requires labeling	Fix on site		
299	No repairs needed				SP601 OH208

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JAKE CARDENEZ /DARREN WEIM

APPROVED BY  
J. D. JENKINS



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**ATTACHMENT B**

<b>Quality Assurance Report Form</b>						
<b>CMP Internal Audit for the _____ Quarter of 200__</b>						
<b>Type of Inspection</b>	<b>Cycle</b>	<b>Total Facilities Inspected</b>	<b>1% Audited (minimum 5)</b>	<b># of Infractions Reported by Inspector</b>	<b># of Infractions Confirmed by GF</b>	<b>% SCORE reported/ confirmed</b>
Overhead Visual (Poles)	5 year					
Above Ground External	3 year					
Above Ground Internal	3 year					
Switches	3 year					
Sub Surface	10 year					
Sub Surface	3 year					
<b>Type of Infraction</b>	<b>Cycle</b>	<b>Total Infractions Repaired</b>	<b>1% Audited (minimum 5)</b>	<b># Cleared &amp; Confirmed by GF</b>	<b># To be Cleared in DIMS</b>	<b>% SCORE confirmed/to be cleared</b>
Overhead Visual (Poles)	5 year					
Underground	3 or 5 year					

ISSUED BY <b>JAKE CARDENEZ /DARREN WEIM</b>	APPROVED BY <b>J. D. JENKINS</b>
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Attachment for Question 6b\_Deferring CMP Facility And Equipment Repairs\_Mar2003



DIVISION <b>DISTRIBUTION OPERATIONS</b>	DEPARTMENT <b>ELECT. DISTRIBUTION SERVICES</b>	EFFECTIVE DATE <b>MARCH 15, 2003</b>
SECTION <b>CORRECTIVE MAINTENANCE</b>		
SUBJECT TITLE <b>DEFERRING CMP FACILITY AND EQUIPMENT REPAIRS</b>		

**REVISION HISTORY**

This revision provides further clarification related to the deferral process

**1.0 PURPOSE**

- 1.1 Under certain circumstances, facility and equipment repairs resulting from a maintenance inspection cannot be accomplished within the internal company backlog repair period policy. These occurrences will be evaluated for a deferred status on an individual basis. This policy sets conditions under which a facility or equipment repair may be deferred and the procedure to complete the deferral.
- 1.2 The internal company backlog repair period is shorter than the CPUC required repair period to ensure that the CPUC repair period is not exceeded. The current internal company backlog repair period policy is 10 months.

**2.0 GENERAL PROCESS FOR REQUESTING CMP FACILITY REPAIR DEFERMENTS**

- 2.1 Deferrals must meet one of the six deferment reasons and criteria outlined in Section 3.0.
- 2.2 The District should attempt to resolve all unusual material ordering, third party caused infractions or permit issues in a manner to meet the internal company backlog repair period. When the issue is unable to be resolved, the District shall contact the appropriate agency or SDG&E Department for resolution. If the issue does not appear capable of being resolved within the internal company backlog repair period and the deferral criteria is met, then a Deferral Request Form must be submitted. See attached example. This form is to be submitted to Compliance Management no later than typically one month before the internal company backlog repair period is complete. All Deferral Request Forms must include an anticipated "Date Certain" (or ETA) which is the date that the infraction is expected to be cleared.
- 2.3 Repairs must be made within the internal company backlog repair period to the month. For example, if a facility was inspected on 1/18/01 and the internal company backlog repair period is 10 months, then the repair must be made by 11/31/01 or be deferred.
- 2.4 If Compliance Management refuses a deferral request because it does not meet the criteria in this Standard Practice, then the infraction must be cleared within the internal company backlog repair period.
- 2.5 Every attempt should be made to correct a deferred infraction ASAP.

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DIVISION <b>DISTRIBUTION OPERATIONS</b>	DEPARTMENT <b>ELECT. DISTRIBUTION SERVICES</b>	EFFECTIVE DATE <b>MARCH 15, 2003</b>
SECTION <b>CORRECTIVE MAINTENANCE</b>		
SUBJECT TITLE <b>DEFERRING CMP FACILITY AND EQUIPMENT REPAIRS</b>		

**3.0 ACCEPTABLE DEFERRMENT REASONS AND GENERAL PROCEDURES**

**(Refer to Section 4 for treatment of specific codes)**

The following are the six reasons for which an infraction can be deferred:

**3.1 Foreign Utility**

3.1.1 **Underground** working space encroachments – Applies when foreign utilities encroach upon SDG&E underground workspaces, causing operation and safety concerns, or preventing access for inspecting and maintaining SDGE facilities and equipment.

The District will send the IO Report and Follow-up Request Form (example attached) to Compliance Management typically within 90 days of the initial CMP inspection date. The District should note in the DIMS's on-line comments "IO sent to Compliance Management on XX /XX /XX date- Foreign Utility". Upon receipt of the IO, Compliance Management will send a notification letter to the foreign utility to correct the infraction. Compliance Management will notify the Districts via a monthly IO status report when an UG infraction has been cleared by a foreign utility. The District will clear the infraction in DIMS. If in the course of running their backlog, a District finds a foreign utility infraction has not been cleared, the District will submit a Deferral Request Form to Compliance Management typically one month before the internal company backlog repair period is complete. Compliance Management will forward the approved deferral form, typically two weeks prior to the internal company backlog repair period is complete, to the Standard's CMP Team to defer the infraction in DIMS.

3.1.2 **Overhead** General Order (GO) 95 infractions caused by foreign utilities- For overhead infractions caused by foreign utilities, the District will submit an IO Report and Follow-up Form (example attached) to Compliance Management typically within 90 days of the initial CMP inspection date. The District should note in the DIMS's on-line comments "IO sent to Compliance Management on XX /XX /XX date- Foreign Utility". The District will clear in DIMS once the IO has been sent. Compliance Management will send a notification letter to the foreign utility causing the infraction. Compliance Management will inform the Districts that the letter has been sent or the infraction corrected via a monthly IO status report.

For codes 19, 47, 95, 228, 229, 246, 681 and 300 series, refer to section 4.0 for specific procedures and treatment in DIMS.

**3.2 Private Property**

3.2.1 **Underground** work space encroachments- Applies when obstructions or encroachments in SDG&E UG workspaces are caused by private property and result in operational and safety concerns, or prevent access for inspecting and maintaining SDGE facilities and equipment.

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<small>DIVISION</small> <b>DISTRIBUTION OPERATIONS</b>	<small>DEPARTMENT</small> <b>ELECT. DISTRIBUTION SERVICES</b>	<small>EFFECTIVE DATE</small> <b>MARCH 15, 2003</b>
<small>SECTION</small> <b>CORRECTIVE MAINTENANCE</b>		
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The Districts will attempt to resolve private property conflicts. If unable to resolve, the District will send the IO Report and Follow-up Request Form (example attached) to Compliance Management. The District should note in the DIMS's on-line comments "IO sent to Compliance Management on XX /XX /XX date- Private Property". Compliance Management will coordinate corrective action with Land Management. If Land Management is unable to resolve within the internal company backlog repair period, then Land Management will notify Compliance Management no longer than 9 months after the initial CMP inspection date. Compliance Management will notify the Districts via a monthly IO status report when the infraction has been cleared. The District will clear the infraction in DIMS. If in the course of running their backlog, a District finds one of these infractions has not been cleared, the District will submit a Deferral Request Form to Compliance Management typically one month before the internal company backlog repair period is complete. Compliance Management will forward the approved deferral form, two weeks prior to the internal company backlog repair period is complete, to the Standard's CMP Team to defer the infraction in DIMS.

**3.2.2 Customer Owned Facilities-** For customer owned equipment, for example, vent fans in customer vaults, if there is an abnormal condition, the inspectors will use the appropriate condition code and record in field comments, "customer owned". The Districts will resolve the infraction with the customer. If unable to be resolved with the customer, the District will send an IO to Compliance Management. Compliance Management will coordinate corrective action with Land Management. If Land Management is unable to resolve within the internal company backlog repair period, then Land Management will notify Compliance Management no longer than 9 months after the initial CMP inspection date. Compliance Management will notify the Districts via a monthly IO status report when the infraction has been cleared. The District will clear the infraction in DIMS. If in the course of running their backlog, a District finds one of these infractions has not been cleared, the District will submit a Deferral Request Form to Compliance Management typically one month before the internal company backlog repair period is complete. Compliance Management will forward the approved deferral form, two weeks prior to the internal company backlog repair period is complete, to the Standard's CMP Team to defer the infraction in DIMS.

For codes 19, 47, 95, 238, 229, 246, 681 and series 600, refer to section 4.0 for specific procedures and treatment in DIMS.

**3.3 Estimated repair period of an SDGE facility exceeds the internal company backlog repair period:**

**3.3.1 Engineering**

The District will submit a request for resolution of the infraction within the internal company backlog repair period and as soon as possible after the initial inspection. If correction of the infraction due to engineering will exceed the internal company backlog repair period, then the District will submit a Deferral Request to Compliance Management. Applicable examples include follow-up to be done by Civil/Structural Engineering, Planning, or Distribution Workflow. The District must request the engineering review in a manner to complete the work within the internal company backlog repair period. If the work cannot

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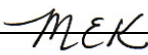
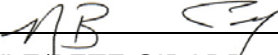
be completed within the internal company backlog repair period, the District will submit a Deferral Request Form to Compliance Management for approval within typically one month of the completion of the internal company backlog repair period. Compliance Management will forward the approved Deferral Request Form to the Standards CMP Team within two weeks of the internal company backlog repair period. The District will monitor the progress of the deferred infraction resolution and clear in DIMS when the infraction is corrected.

A deferral may be requested when the CMP repairs are to be incorporated into other planned work on the same or adjacent facilities that was scheduled prior to the initial CMP inspection, such as a conversion, line extension or re-conductor work. In general, this other work must pre-exist the CMP inspection and have a completion date no later than 6 months past the internal company backlog repair period. An extension, by means of a deferral, may be requested from Compliance Management if this criteria has been met.

**3.3.2 Municipal/Environmental Permit Issues**

This applies when municipal, county or environmental permits (trenching, street closure, sensitive habitat, etc.) can not be issued by the controlling jurisdiction within the internal company backlog repair period. The District must have contacted the municipality, county or SDG&E Environmental Department for permitting within a timeframe that would allow completion within the internal company backlog repair period. If unable to resolve within the internal company backlog repair period, the District will submit a Deferral Request Form to Compliance Management within typically one month of the completion of the internal company backlog repair period. Compliance Management will forward the approved Deferral Request Form to the Standards CMP Team within two weeks of the internal company backlog repair period. The District will monitor the progress of the infraction resolution and clear in DIMS when the deferred infraction is corrected.

For pole replacement candidates found through the CMP Program (codes 246 and 681), in some cases, the Districts may need to submit requests for shell thickness verification by SDG&E's Wood Pole Integrity Inspection Contractor to Vegetation Management. In addition, all pole replacements need to be evaluated to determine if they are in an Environmentally Sensitive Area (ESA). If they are in an ESA, then the appropriate permitting will need to be completed prior to construction. Due to the inherently long process, potential pole replacements should be addressed/reconciled as soon as possible after the initial CMP inspection. If the Environmental or other requirements will exceed the internal company backlog repair period, then the District should submit a Deferral Request Form to Compliance Management no longer than two weeks prior to the completion of internal company backlog repair period. Compliance Management will forward the approved Deferral Request Form to the Standards CMP Team no longer than one week prior to the completion of the internal company backlog repair period so that the CMP Team can defer in DIMS. The District will monitor the progress of the infraction and clear in DIMS when the deferred infraction is corrected.

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**3.3.3 Right-of- Way Acquisition Issues**

The Districts will submit right-of-way acquisition problems to the Land Department (Right of Way) in a timeframe consistent with meeting the internal company backlog repair period. As part of the normal backlog review, the District will ensure that the necessary infractions have been deferred prior to typically one month of the completion of the internal backlog repair period. The District is responsible for monitoring the backlog as it approaches the internal company backlog repair period and contacting Right of Way to determine the status. When required, due to exceeding the internal company backlog repair period, the District will submit a Deferral Request Form to Compliance Management within typically one month of the completion of the internal company backlog repair period. The Deferral Request Form will include the specific issue that prohibits the repairs within the internal company backlog repair period and an anticipated "date certain" when the infraction will be corrected. Compliance Management will forward the approved Deferral Request Form to the Standards CMP Team prior to two weeks of the completion of the internal company backlog repair period. The Standard's CMP Team will defer in DIMS. The District will monitor the progress of the infraction and clear in DIMS when the deferred infraction is corrected.

**3.3.4 Legal Requirements**

There may be rare occasions where planned repairs on facilities, triggered by CMP inspections, cannot be completed for legal reasons, such as, for incident investigation, litigation or investigation of property rights. The District will submit legal problems to the Land Department in a timeframe consistent with meeting the internal company backlog repair period. When required, due to exceeding the internal company backlog repair period, the District will submit a Deferral Request Form to Compliance Management for approval prior to typically one month of completion of the internal company backlog repair period. Compliance Management will forward the approved form to the Standards CMP Team prior to two weeks of the completion of the internal company backlog repair period. The Deferral Request Form must include the specific action that prohibits the repairs within the internal company backlog repair period and an anticipated date certain when the infraction will be corrected. The District will monitor the progress of the deferred infraction and clear in DIMS when the infraction is corrected.

**Note:** For codes 19, 47, 95, 238, 229, 246, 681 and series 600, refer to section 4.0 for specific procedures and treatment in DIMS

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**4.0 SPECIFIC CMP CODES, ASSOCIATED PROCEDURES AND TREATMENT IN DIMS**

Specific treatment of some codes is described below.

4.1 **Code 19 (GO Infraction)-** "Cannot open, locate or inspect, inaccessible". Foreign Utility Infractions- Foreign utility infractions should be resolved at the District, if at all possible. If not possible to resolve at the District and this is due to a foreign utility, then an I/O should be sent to Compliance Management typically within 90 days after the initial CMP inspection date. The District should note in the DIMS's on-line comments "IO sent to Compliance Management on XX /XX /XX date-Foreign Utility". Upon receipt of the IO, Compliance Management will send a notification letter to the foreign utility to correct the infraction. Compliance Management will notify the Districts via a monthly IO status report when an infraction has been cleared by a foreign utility. The District will clear the infraction in DIMS. If in the course of running their backlog, a District finds a foreign utility infraction has not been cleared, the District will submit a Deferral Request Form to Compliance Management typically one month before the internal company backlog repair period is complete. Compliance Management will forward the approved deferral form, typically two weeks prior to the internal company backlog repair period is complete, to the Standard's CMP Team to defer the infraction in DIMS.

This infraction will remain deferred in DIMS until resolution by Compliance Management and **until the District has inspected the facility**. The District will inspect the facility as per 4.1.1 below. Code 19 should be distinguished as SDG&E, Private Property or Foreign Utility in the DIMS comment field for managing, tracking and reporting purposes. SDG&E caused infractions should not be submitted to Compliance Management and a deferral will typically not be necessary since these are within SDG&E control.

For Code 19, Private Property Infractions- The Districts will attempt to resolve private property conflicts within a timeframe consistent with meeting the internal company repair period. If unable to resolve, the District will send the IO Report and Follow-up Request Form (example attached) to Compliance Management. The District should note in the DIMS's on-line comments "IO sent to Compliance Management on XX/ XX/ XX date". "Private Property" should be specified in the comments. Compliance Management will coordinate corrective action with Land Management. Compliance Management will notify the Districts via a monthly IO status report when the infraction has been cleared by the private property owner. The District will clear the infraction in DIMS. If in the course of running their backlog, a District finds a private property infraction has not been cleared, the District will submit a Deferral Request Form to Compliance Management typically one month before the internal company backlog repair period is complete. Compliance Management will forward the approved deferral form, typically two weeks prior to the internal company backlog repair period is complete, to the Standard's CMP Team to defer the infraction in DIMS.

This infraction will remain deferred in DIMS until resolution by Compliance Management and **until the District has inspected the facility**. The District will inspect the facility as per 4.1.1 below. Code 19 should be distinguished as SDG&E, Private Property or Foreign Utility in the DIMS comment field for managing, tracking and reporting purposes. SDG&E caused infractions should not be submitted to Compliance Management and a deferral will typically not be necessary since these are within SDG&E control.

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4.1.1 If the ‘no access’ infraction is caused by other than Foreign Utility or Private Property and the internal repair period will be exceeded for one of the six reasons described above, the District will submit a Deferral Request Form (see example attached) to Compliance Management typically one month prior to completion of the internal repair period. Compliance Management will forward the approved Deferral Request Form to the Standard’s CMP Team prior to two weeks of completion of the internal company backlog repair period. The Standard’s CMP Team will defer the infraction in DIMS prior to the internal company backlog repair period. The District will clear the infraction in DIMS when it is corrected.

**Revisit of facility for inspection to clear a Code 19 infraction:**

**Code 19s will remain pending or deferred until after the cause of the inaccessibility is cleared and until the facility is inspected.** Once the facility is inspected, the inspection results should be entered into DIMS via the MDT. After the inspection results are entered, the code 19 should be cleared. This process allows the Districts to manage Code 19 required re-inspections.

4.2 **Code 47 (UG Discretionary Condition) “Weeds, trees, brush, dirt or obstacle”.** Condition can be corrected on site. If the obstruction cannot be corrected on site, it should be as coded 19 or 95. Since Code 47s are corrected on site, deferrals do not apply.

4.3 **Code 95 (UG GO Infraction)- “No working space”** – Condition cannot be corrected on site but unit can be inspected.

4.3.1 If a “no working space” infraction is caused by a foreign utility, the District will forward an IO Report and Follow-up Request Form (example attached) to Compliance Management. The District should note in the DIMS’s comments field “IO sent to Compliance Management on XX /XX /XX date- Foreign Utility”. Upon receipt of the IO, Compliance Management will send a notification letter to the foreign utility to correct the infraction. Compliance Management will notify the Districts via a monthly IO status report when the infraction has been cleared by the foreign utility. The District will clear the infraction in DIMS. If in the course of running their backlog, a District finds a foreign utility infraction has not been cleared, the District will submit a Deferral Request Form to Compliance Management typically one month before the internal company backlog repair period is complete. Compliance Management will forward the approved deferral form, typically two weeks prior to the internal company backlog repair period is complete, to the Standard’s CMP Team to defer the infraction in DIMS.

4.3.2 If a “no working space” infraction is caused by private property, the Districts will attempt to resolve private property conflicts within a timeframe consistent of meeting the internal company backlog repair period. If unable to resolve, the District will send the IO Report and Follow-up Request Form (example attached) to Compliance Management. The District should note in the DIMS comment field “IO sent to Compliance Management on XXXX date- Private Property”. Upon receipt of the IO, Compliance Management will send a notification letter to the foreign utility to correct the infraction. Compliance Management will notify the Districts via a monthly IO status report when the infraction has been cleared by a private property owner.

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The District will clear the infraction in DIMS. If in the course of running their backlog, a District finds the private property infraction has not been cleared, the District will submit a Deferral Request Form to Compliance Management typically one month before the internal company backlog repair period is complete. Compliance Management will forward the approved deferral form, typically two weeks prior to the internal company backlog repair period is complete, to the Standard's CMP Team to defer the infraction in DIMS.

4.3.3 If the 'no work space' infraction is caused by other than Private Property or Foreign Utility and the internal repair period will be exceeded for one of the six reasons described above, the District will submit a Deferral Request Form (see example attached) to Compliance Management typically one month prior to completion of the internal repair period. Compliance Management will forward the approved Deferral Request Form to the Standard's CMP Team prior to two weeks of completion of the internal company backlog repair period. The Standard's CMP Team will defer the infraction in DIMS prior to the internal company backlog repair period. The District will monitor the progress of the deferred infraction and clear in DIMS when corrected.

4.3.4 Code 95 should always be distinguished as SDG&E or foreign utility for managing, reporting and tracking purposes.

4.4 **Code 229 (OH GO Infraction)-"Climbing Space"**- For overhead infractions caused by foreign utilities - the District will submit an IO Report and Follow-up Form (example attached) to Compliance Management typically within 90 days of the initial CMP inspection date. The District should note in the DIMS's on-line comments "IO sent to Compliance Management on XX/ XX/ XX date- Foreign Utility". The District will clear in DIMS after the IO has been submitted to Compliance Management. Upon receipt of the IO, Compliance Management will send a notification letter to the foreign utility and log that the letter was sent in a monthly IO status report. Compliance Management will notify the Districts via the monthly status report when the deferred infraction is corrected so that the District can clear it in DIMS.

Note in DIMS comment field whether SDGE or Foreign Utility caused.

Code 229 caused by SDG&E does not require an IO or typically a deferral because they are within SDG&E's control.

4.5 **Code 238 (OH GO Infraction)- "Abandoned Facilities"**- The District will send an I/O to Compliance Management and Land Department as per SPM 200. Compliance Management and Land will resolve the infraction as per SPM 200. This code may need to be accompanied by Code 239- "Idle Facilities" when SDGE equipment needs to be removed. Deferrals would not typically apply to Code 239, since these are within SDG&E's control. Should the Code 238 take longer to resolve than the internal company backlog repair period, then the District will submit a Deferral Request Form to Compliance Management for approval prior to typically one month of the completion of the internal company backlog repair period. Compliance Management will approve and forward to the Standards CMP Team prior to two weeks of the completion of the internal company backlog repair period. The Districts will monitor the progress of the deferred infraction and clear in DIMS when the infraction is corrected.

ISSUED BY	APPROVED BY
ME KOLEHOUSE <i>MEK</i>	NEIL BOYLE/PETE GIRARD <i>AB EG</i>

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4.6 **Codes 300 Series-** Code 300 series are used to manage tree/vegetation infractions. In cases where an infraction is going to exceed the internal company backlog repair period, the District will submit a Deferral Request Form (see example attached) to Compliance Management typically one month prior to completion of the internal repair period. Compliance Management will forward the approved Deferral Request Form to the Standard's CMP Team prior to two weeks of completion of the internal company backlog repair period. The Standard's CMP Team will defer the infraction in DIMS prior to the internal company backlog repair period. Vegetation Management will issue weekly status reports to the Districts via e-mail. The Districts will use these reports to clear the corrected infractions in DIMS.

**5.0 APPROVAL AND RECORDING OF DEFERALS**

- 5.1 Compliance Management will make the determination if a deferral request meets the stated criteria and is acceptable. Compliance Management will notify the District and the CMP Team of their decision. If approved, the Standards CMP team will defer in DIMS.
- 5.2 Compliance Management will forward the approved Deferral Request Forms to the Standards CMP Team prior to two weeks of the completion of the internal company backlog repair period. The Standards CMP Team will maintain a hard copy notebook of all approved Deferral Request Forms.
- 5.3 The Standards CMP team will change the record status to "D" (deferred) in DIMS and code in first position in the on-line comment field the reason for the deferral (PP= Private Property, PR= Permits, EN= Engineering, LG= Legal, FU= Foreign Utilities, RW=Right of Way) with the anticipated "date certain" that the infraction will be completed as provided on the approved Deferral Request Form. The Standard's CMP Team will provide internal monthly deferral reports to the Districts and Compliance Management. The Standard's CMP Team will provide deferral data to Compliance Management for the annual reporting to the CPUC.

**6.0 REFERENCES**

6.1 None

**7.0 ATTACHMENTS**

- 7.1 **ATTACHMENT A:** Deferral Request Form
- 7.2 **ATTACHMENT B:** IO Report and Follow-up Request Form (for all IOs sent to Compliance Management)
- 7.3 **ATTACHMENT C:** Instructions For Filling out the IO Report and Follow-up Request Form


ISSUED BY <b>ME KOLEHOUSE</b>	APPROVED BY <i>MEK</i> <b>NEIL BOYLE/PETE GIRARD</b>
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**ATTACHMENT B**



**I/O REPORT AND FOLLOW UP REQUEST**  
San Diego Gas & Electric Company

DATE \_\_\_\_\_

LOCATION \_\_\_\_\_ DISTRICT \_\_\_\_\_

THOMAS BROS \_\_\_\_\_ LINE CHECKER \_\_\_\_\_

MAP NUMBER \_\_\_\_\_  OVERHEAD

UNDERGROUND

CIRCUIT # \_\_\_\_\_  RBO/LAND

POLE/CAL GRID NUMBER \_\_\_\_\_  CABLE TV

\_\_\_\_\_  TELCO

\_\_\_\_\_  OTHERS \_\_\_\_\_

INFRACTION CODE \_\_\_\_\_

DEVIATION FROM STANDARD REQUESTED, NO FOLLOW-UP REQUIRED

Completed order - Return To: \_\_\_\_\_

ISSUED BY <b>ME KOLEHOUSE</b>	APPROVED BY <b>NEIL BOYLE/PETE GIRARD</b>
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**ATTACHMENT C****7.3 Instructions For Filling Out IO Report and Follow-up Form**

List of items needed to properly complete IO Report and Follow-up Request:

- Facility Number
- Picture
- Condition code(s)
- Correct address
- Map
- Correct utility- cable, telephone, etc. (Example: Pedestal in front of station/fusing cabinet, can not be opened. Telephone is causing the problem).

If IO is not filled out with the required information it will be returned to the District.

For questions regarding this form, please contact Compliance Management.

ISSUED BY	<i>MEK</i>	APPROVED BY	<i>AB</i> <i>EG</i>
ME KOLEHOUSE		NEIL BOYLE/PETE GIRARD	

Attachment for Question 6b\_Example of a GO95 infraction notification



A Sempra Energy company

REQUEST FOR CORRECTION OF GENERAL ORDERS.  95  128  
INFRACTION

<input type="checkbox"/> TELCO	<input type="checkbox"/> REO	SAN DIEGO GAS AND ELECTRIC	REQUEST NO. <b>901315</b>
<input checked="" type="checkbox"/> CATV	<input type="checkbox"/>	ORIGINATED BY - [REDACTED]	TITLE - [REDACTED]
		DISTRICT --NE	TEL NO. EXT. [REDACTED]
LOCATION <b>3102 OLIVEHILL RD-FALLBROOK</b>			
FACILITY ID NUMBER(S) <b>P112567</b>		THOM. BROS. <b>1047-G2</b>	DATE 6-28-07
INFRACTION			<b>G.O. 95 RULE NO.</b>
	RUN-RISER NOT SUITABLY COVERED IN CLIMBING SPACE		22.2 - 84.6 E
	GROUND NOT SUITABLY COVERED IN CLIMBING SPACE		22.2 - 84.6 B
	TERMINATION IN CLIMBING SPACE GROUND RUN-RISER		54.7 - 84.7 - 93
	EQUIPMENT AND/OR SERVICE OBSTRUCTING CLIMBING SPACE		54.7 - 84.7 E - 93
	IMPAIRED VERTICAL CLEARANCE COMMUNICATION TO SUPPLY		38 TABLE 2 - 84.8 D - 92.1
	GUARD ARM REQUIRED OR IMPROPERLY INSTALLED		20.9 D - 87.4 C-3 - 87.7 B
	IMPAIRED CLEARANCE COMMUNICATION CABLE TO SUPPLY GUY		86.4
	POLE STEPS REQUIRED		91.3 A
	CLIMBING SPACE NOT MAINTAINED 4' ABOVE AND BELOW LEVELS		84.7
	WOOD POLE STRENGTH REQUIREMENTS		44, 44.1, 91.2
INFRACTION			<b>G.O. 128 RULE NO.</b>
	EQUIPMENT INOPERABLE OR NOT REASONABLY ACCESSIBLE		<b>17.1 - 34.1</b>
	CLEARANCE BETWEEN TWO OR MORE SYSTEMS		<b>17.3 17.5</b>
ADDITIONAL INFORMATION <b>SERVICE DROP: Service drop blocking climbing space at communications level. Relocate outside climbing space.</b> <b>MID-SPAN:Mid-span separation inadequate. Re-sag cable/messenger.</b>  <b>Underground cable riser inside climbing space. Relocate riser outside the climbing space.</b> <b>PEDESTAL: Pedestal prevents opening/operating electric equipment. Relocate communication pedestal.</b>		[REDACTED]	
[REDACTED]		NOTIFY SDG&E Compliance Management	TEL NO [REDACTED]
PROCESSED BY [REDACTED]		WHEN CORRECTIONS COMPLETED, SIGN FORM AT LEFT, FOLD AND RETURN TO ADDRESS ON THE BACK	

RECEIVED BY

USE REQUEST NUMBER IN ALL COMMUNICATIONS

