

Data Request Number: SPD-SDGE-SB884-001

SB-884 Program: CPUC Guidelines

Publish To: Safety Policy Division – California Public Utilities Commission

Date Received: 4/3/24

Date Responded: 4/17/24

Please provide responses to the items listed below.

1. Provide a list of balancing and memorandum accounts where the costs of wildfire mitigations are currently being recorded as of April 1, 2024.
 - a. In this context wildfire mitigations include any investments in assets, services or O&M that are used to reduce wildfire risk.

SDG&E Response 1a: Currently, wildfire mitigation costs are recorded to the Wildfire Mitigation Plan Memorandum Account (costs other than tree trimming to implement SDG&E’s approved Wildfire Mitigation Plans) and the Tree Trimming Balancing Account (tree trimming costs). To the extent that SDG&E begins to incur costs for new projects that have not yet been approved in WMP, SDG&E currently records such costs to the Fire Risk Mitigation Memorandum Account (FRMMA). For requests pending, please see response to Question 2.

- b. For each balancing and/or memorandum account listed, include which mitigation type the account is used to record the costs for:

- i. Undergrounding (UG)

SDG&E Response 1(b)i: Undergrounding (UG) costs are recorded to the Wildfire Mitigation Plan Memorandum Account.

- ii. Covered conductor (CC)

SDG&E Response 1(b)ii: Covered conductor (CC) costs are recorded to the Wildfire Mitigation Plan Memorandum Account.

- iii. Vegetation management (VM)

SDG&E Response 1(b)iii: Tree Trimming costs are recorded to the SDG&E’s Tree Trimming Balancing Account, as authorized in D.19-09-051. Certain vegetation management costs related to pole brushing and fuels management are recorded to the Wildfire Mitigation Plan Memorandum Account

- iv. Other (describe)

SDG&E Response 1iv: SDG&E is unsure what is meant by term ‘other’ and requests that SPD further clarify any specific initiatives for which it seeks additional information. SDG&E notes that the cost of its approved Wildfire Mitigation Plan initiatives, which fall into ten major categories,¹ are recorded in its Wildfire Mitigation Plan Memorandum account. To the extent

¹ These categories include: (1) Risk Assessment and Mapping, (2) Situational Awareness and forecasting, (3) Grid Design and System Hardening, (4) Asset Management and Inspections, (5) Vegetation Management and Inspections,

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that SDG&E begins to incur costs for new projects that have not yet been approved in WMP, SDG&E currently records such costs to the Fire Risk Mitigation Memorandum Account (FRMMA). All costs associated with the implementation of regulations and requirements adopted in R.15-05-006 that have not been previously authorized for recovery in SDG&E's GRC or any other regulatory proceedings are recorded in the Fire Hazard Prevention Memorandum Account.

- c. Provide a mapping of the linkage between a memorandum account and it's associated balancing account.
 - i. Are there any circumstances where a memorandum account can map to more than one balancing account, or to another memorandum account?

SDG&E Response 1(c)i: There are no linkages between the above discussed Wildfire Mitigation Plan Memo Account and the Tree Trimming Balancing Account. For costs recorded to the FRMMA, once the projects are approved in a WMP, SDG&E transfers such costs to the WMPMA.

- ii. Are there any circumstances where a balancing account can map to more than one memorandum account, or to another balancing account?

SDG&E Response 1(c)ii: No. A balancing account does not map to more than one account.

(6) Grid Operations and Protocols, (7) Data Governance, (8) Resource Allocation Methodology, (9) Emergency Planning and Preparedness, and (10) Stakeholder Cooperation and Community Engagement.

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d. The list of each balancing account should include information in the following tabular format:

Balancing Account Name	CPUC Proceeding Number	CPUC Decision Number	SDGE Accounting Number	Any Other ID Number	Type of Wildfire Mitigation Included in this Account	Current Dollar Value of Wildfire Mitigation Costs Recorded to this Balancing Account

SDG&E Response 1d:

Balancing Account Name	CPUC Proceeding Number	CPUC Decision	SDGE Accounting Number	Any Other ID Number	Type of Wildfire Mitigation	Current Dollar Value of Wildfire Mitigation Costs Recorded as of 2/29/2024
Tree Trimming Balancing Account	A.17-10-007	D.19-09-051	1150400/(2190086)	TTBA - Electric	Vegetation mitigation	\$161,222,325

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- e. The list of each memorandum account should include information in the following tabular format:

Memo Account Name	CPUC Proceeding Number	CPUC Decision Number	SDGE Accounting Number	Any Other ID Number	Type of Wildfire Mitigation Included in this Account	Current Dollar Value of Wildfire Mitigation Costs Recorded to this Memo Account

SDG&E Response 1e:

Memo Acct Name	CPUC Proceeding Number	CPUC Decision	SDGE Accounting Number	Any Other ID Number	Type of Wildfire Mitigation	Current Dollar Value of Wildfire Mitigation Costs Recorded as of 2/29/2024
Wildfire Mitigation Plan Memorandum Account - Electric	R.18-10-007	D.19-05-039	1150744/(2190350)	WMPMA-Electric	Undergrounding, Covered Conductor	\$723,020,367
Wildfire Mitigation Plan Memorandum Account - Gas	R.18-10-007	D.19-05-039	1150745/(2190351)	WMPMA-Gas	Undergrounding, Covered Conductor	\$2,257,417

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- f. The list of each memorandum account and its associated balancing account should include information in the following tabular format:

Memo Account Name	Associated Balancing Account Name

SDG&E Response 1f: N/A

- i. If the accounts listed here are not listed above in d. or e., please provide a narrative explanation for why they are not listed.

SDG&E Response 1(f)i:

FRMMA and FHPMA are not included in part e as the balance in each is \$0.

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2. As of April 1, 2024, does SDGE have any pending applications for balancing and/or memorandum accounts where it intends to record the costs of wildfire mitigations? If so, provide a list of those Application and Decision numbers and the type of mitigation SDGE intends to associate with these pending balancing and/or memorandum accounts.

SDG&E Response 2:

Yes, SDG&E's 2024 Test Year GRC Application A.22-05-016 requests the creation of two balancing accounts to record wildfire mitigation costs, including vegetation management. The request includes the Wildfire Mitigation Balancing Account to include all wildfire mitigation work within the application, and the Vegetation Management Balancing Account (VMBA) to include all vegetation management work within the application. If approved in the 2024 GRC, SDG&E would convert the existing TTBA into the VMBA