

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

Application of SAN DIEGO GAS & ELECTRIC)
COMPANY for Review of its Proactive De-)
Energization Measures and Approval of Proposed)
Tariff Revisions)
(U 902-E))
_____)

Application No. 08-12-021

**SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
UPDATE TO INFORMATIONAL FILING**

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April 10, 2009

**BEFORE THE PUBLIC UTILITIES COMMISSION
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Application of SAN DIEGO GAS & ELECTRIC)
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**SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
UPDATE TO INFORMATIONAL FILING**

Pursuant to assigned Administrative Law Judge Kenney's Ruling dated April 3, 2009, San Diego Gas & Electric Company (SDG&E) hereby files the requested Update to its prior Informational Filing dated March 13, 2009.¹ In the attached Update, SDG&E provides additional information on the following topics as set forth in the ALJ's Ruling:

- The SANDAG estimate of the population (in 2008) living in (1) all areas subject to de-energization in 2009, and (2) each discrete area subject to de-energization in 2009.
- The estimated average number of people affected by each de-energization event using SANDAG population data for 2008.
- The estimated person-weighted average duration of each de-energization event using SANDAG population data for 2008.
- A breakdown of SDG&E's projected costs for its de-energization program, including startup and recurring costs through 2012. The breakdown shall list and describe each cost or category of cost that exceeds \$500,000 during a single calendar year.
- The following information for each of the 13 power line fires since August 2003 that is associated with a high-wind event: Date the fire started; location; size in acres; extent of any injuries or property damage, if known; how the fire was ignited; why SDG&E believes the

¹ See the April 3, 2009 "Administrative Law Judge's Ruling Granting in Part and Denying in Part the Motion to (1) Postpone Comments and (2) Compel San Diego Gas & Electric Company to Provide Certain Information," p. 16.

fire is associated with a high-wind event; and why SDG&E believes de-energization might have prevented the fire.

Dated at San Diego, California, this 10th day of April, 2009.

Respectfully submitted,

/s/ LISA G. URICK _____

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Question 1:

The SANDAG estimate of the population (in 2009) living in (1) all areas subject to de-energization in 2009, and (2) each discrete area subject to de-energization in 2009.

SDG&E Response:

The San Diego Association of Governments (SANDAG) estimate of the population, based on most recent 2008 data, living in all areas subject to de-energization in 2009 is 129,976 people. Table 1 that follows details the SANDAG estimate of the population of each discrete area in San Diego County subject to de-energization.

Please note that the areas covered by both the Bell Canyon RAWs and the Talega RAWs are not part of SANDAG's total since these people reside in Southern Orange County and are outside of SANDAG's regional responsibility. These two discrete areas in Orange County account for roughly 100² people. Therefore, the fact that SANDAG is unable to provide this data does not materially affect the overall population estimates.

A pdf version of the SANDAG de-energization population study is attached for your reference.



SANDAG_EPSO_Pop
ulation_Study.PDF

² See SDG&E's response to Question 4 of March 13th Informational Filing, A.08-12-021.

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Table 1: SANDAG Estimate of Population Data	
Area (by RAWS name)	SANDAG Estimate of Population Living in Area
Alpine	42205
Ammo Dump	3288
Bell Canyon	N/A
Cameron	7908
Camp Elliott	8199
Descanso	17089
Goose Valley	45580
Julian	4001
Mount Laguna	391
Oak Grove	1272
Palomar	1126
Pine Hills	3706
Potrero	5423
Ranchita	1802
San Miguel	6119
Talega	N/A
Valley Center	29932

Kohls, Norm

From: Gordon, Andrew [ago@sandag.org]
Sent: Friday, April 03, 2009 5:17 PM
To: Kohls, Norm
Cc: Thomas, J C.
Subject: SANDAG EPSO Population Study Complete
Attachments: 2008PopulationEstimates.xls

Norm,

Please find the attached results of the requested population estimates associated with the GIS polygon data provided by SDG&E. It should be noted that SANDAG efforts are limited only to San Diego County, and thus we are not able to provide results for the two Orange County areas. Estimates are based on our January 1, 2008 data.

Per your request, I am providing the estimated total number of people living in the in all the polygon areas combined, as well as an estimated number for each of the 15 sub-regional polygons. Populations for each of those are called out by name of Polygon. Additional notes regarding the methodology used are included in the file below the results table.

If you have any questions, please don't hesitate to contact me.

Thank you,

Andrew Gordon
GIS Client Services Analyst
San Diego Association of Governments (SANDAG)
401 B Street, Suite 800
San Diego, CA 92101
Phone: (619) 699-6965
ago@sandag.org

Area	2008 Population Estimates
Alpine	42,205
Ammo Dump	3,288
Cameron	7,908
Camp Elliot	8,199
Descanso	17,089
Goose Valley	45,580
Julian	4,001
Mount Laguna	391
Oak Grove	1,272
Palomar	1,126
Pine Hills	3,706
Potrero	5,423
Ranchita	1,802
San Miguel	6,119
Valley Center	29,932
Total*	129,976

*Note: Due to overlapping areas, the sum of individual areas is greater than the listed total. The figure for total population was computed separately to avoid double counting.

Methodology:

SANDAG maintains a spatial inventory of all housing units and group quarters facilities within the region. This spatial inventory is the basis for a point-in-polygon overlay method using a custom application to tally the number of housing units in a user-defined area.

Once the relevant housing units have been captured, population is calculated using the following formula:

Population = Household Population + Non-Household Population, where Household Population = Housing Units x Occupancy Rate x Persons per Household.

Non-Household Population information is derived from an annual account of group quarters facility (dormitory, barracks, prison, convalescent home, etc...) residents.

Local level occupancy rates and persons per occupied household are applied to the individual housing units based on their location in order to calculate Household Population.

Population figures include residential population only (employees, students, and other visitors are not accounted for).

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Question 2:

The estimated average number of people affected by each de-energization event using SANDAG population data for 2008.

SDG&E Response:

Using the definition of “event” as described in the text of Question 6 of SDG&E’s March 13th Informational Filing, the estimated average number of people affected by each de-energization event using SANDAG population data for 2008 is 18,600.

Using the SDG&E definition of “event” as explained in response to Question 6 of the Informational Filing, the estimated average number of people affected by each de-energization event using SANDAG population data for 2008 is 22,100.

Note that the areas covered by both the Bell Canyon RAWs and the Talega RAWs are not part of SANDAG’s total since these people reside in Southern Orange County, and are outside SANDAG’s regional responsibility.

SDG&E used 81 people and 19 people, respectively, for Bell Canyon and Talega in all calculations of estimated average number of people affected by each de-energization event, which is based on SDG&E’s response to Question 4 from SDG&E’s Informational Filing.

In addition, a limited number of SCE customers (meters) may be subject to the Emergency Power Shut-Off Plan where there are SDG&E "fringe area" circuits, which serve approximately 160 SCE customers pursuant to a contract between SCE and SDG&E. These customers were not included in the calculations of the estimated average number of people affected by each de-energization event.

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Question 3:

The estimated person-weighted average duration of each de-energization event using SANDAG population data for 2008.

SDG&E Response:

Using the definition of “event” as described in Question 6 of SDG&E’s Informational Filing, and the data provided by SANDAG, Table 1 below shows the estimated person-weighted average duration of each event. Duration includes the time the circuits are de-energized due to exceeding the triggers plus the time required for the patrol and restoration process.

Table 1: Based on Question 6 "event" definition		
Event and Date	Weather Station Triggered	Estimated Person-Weighted Average Duration for Event (Hours)
<u>Event 1</u>		
February 9 th through 10 th 2002	Cameron RAWS	34
	Descanso RAWS	
<u>Event 2</u>		
February 10 th 2002	Alpine RAWS	26
	Potrero RAWS	
<u>Event 3</u>		
November 25 th 2002	Ammo Dump RAWS	16
<u>Event 4</u>		
January 5 th through 6 th 2002	Ammo Dump RAWS	24
<u>Event 5</u>		
January 6 th 2003	Bell Canyon RAWS	9
	Talega RAWS	
<u>Event 6</u>		
January 7 th 2003	Bell Canyon RAWS	5
<u>Event 7</u>		
October 26 th 2003	Descanso RAWS	21
<u>Event 8</u>		
December 16 th through 17 th 2004	Ammo Dump RAWS	19
	Cameron RAWS	

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<u>Event 9</u>		
December 24 th 2004	Cameron RAWS	18
<u>Event 10</u>		
February 8 th 2006	Bell Canyon RAWS	19
<u>Event 11</u>		
November 30 th 2006	Ammo Dump RAWS	16
<u>Event 12</u>		
October 21 st through 23 rd 2007	Ammo Dump RAWS	33
	Cameron RAWS	
	Descanso RAWS	
	Goose Valley RAWS	
	Potrero RAWS	
<u>Event 13</u>		
October 22 nd through 23 rd 2007	Alpine RAWS	21
	Julian RAWS	
	Valley Center RAWS	
<u>Event 14</u>		
October 14 th 2008	Cameron RAWS	20

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SDG&E defines an event as a continuous period of extreme fire conditions as stated in Question 6 of SDG&E’s March 13th Informational Filing. Table 2 below shows the estimated person-weighted average duration of each event. Once again, duration includes the time the circuits are de-energized due to exceeding the triggers plus the time required for the patrol and restoration process.

Table 2: Based on SDG&E "event" definition		
Event and Date	Weather Station Triggered	Estimated Person-Weighted Average Duration for Event (Hours)
<u>Event 1</u>		
February 9 th through 10 th 2002	Cameron RAWS	29
	Descanso RAWS	
	Alpine RAWS	
	Potrero RAWS	
<u>Event 2</u>		
November 25 th 2002	Ammo Dump RAWS	16
<u>Event 3</u>		
January 5 th through 6 th 2003	Ammo Dump RAWS	24
	Bell Canyon RAWS	
	Talega RAWS	
January 7 th 2003	Bell Canyon RAWS	
<u>Event 4</u>		
October 26 th 2003	Descanso RAWS	21
<u>Event 5</u>		
December 16 th through 17 th 2004	Ammo Dump RAWS	19
	Cameron RAWS	
<u>Event 6</u>		
December 24 th 2004	Cameron RAWS	18
<u>Event 7</u>		
February 8 th 2006	Bell Canyon RAWS	19
<u>Event 8</u>		
November 30 th 2006	Ammo Dump RAWS	16

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<u>Event 9</u>		
October 21 st through 23 rd 2007	Ammo Dump RAWS	28
	Cameron RAWS	
	Descanso RAWS	
	Goose Valley RAWS	
	Potrero RAWS	
	Alpine RAWS	
	Julian RAWS	
	Valley Center RAWS	
<u>Event 10</u>		
October 14 th 2008	Cameron RAWS	20

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Question 4:

A breakdown of SDG&E's projected costs for its de-energization program, including start-up and recurring costs through 2012. The breakdown shall list and describe each cost or category of cost that exceeds \$500,000 during a single calendar year.

SDG&E Response:

The estimated costs for SDG&E's Emergency Power Shut-Off Plan (EPSO) will be dependent on the frequency and scope of de-energization events, the criteria utilized and the rate at which start-up efforts are implemented. Assuming two shut-off events each year, the costs are estimated to range from approximately \$7 million to \$11 million annually, with start-up costs of between \$15 million and \$26 million.

The costs for the EPSO are incremental to normal operating and maintenance costs and do not include non-EPSO expenses for SDG&E's Community Fire Safety Program for system hardening, such as the wood-to-steel pole replacement program and system hardening efforts outside the scope of the EPSO. EPSO costs are those that are related to, in preparation of, or triggered by an EPSO event.

These costs are approximate and do not include any as-yet undetermined expenses, including system projects being developed or under consideration. The following cost estimates are categorized according to various activities as follows (rounded to nearest \$100,000):

Customer Contact, a recurring annual range of approximately \$1.6 to \$2.8 million and a start-up cost of approximately \$2.4 million consisting of:

- Financial support to medical baseline, life support and low-income customers for the procurement of materials and supplies, approximately \$0.5 to \$1.7 million annually. This range is dependent on the number of baseline, life support and low-income customers on circuits that would experience an EPSO event (at \$250 each per customer per EPSO event and the number of EPSO events per year). The range maximum is derived from 900 Medical Baseline and Life Support customers and 5700 low-income customers receiving assistance per year.
- Customer communications in the form of brochures, mailings, community meetings and Web tools, approximately \$0.5 million annually, and \$0.3 million start-up. This estimate is based on similar customer communications activities.
- Survey, information and safety efforts, including the use of the 2-1-1 telephone information system and provision of safety devices and information videos for the proper installation and use of customer-owned backup generators, approximately \$0.3 million annually, \$0.1 start-up. This estimate includes costs based on contract discussions with the 2-1-1 provider and similar activities, and up to 100 sites fitted

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with safety equipment for customer-owned backup generators at \$1000 each for equipment, installation and training.

- Customer Care Centers, including the mobilization of Red Cross Care Centers, transportation of life-support customers, provision of backup generators and safety equipment to those Customer Care centers, approximately \$0.3 million annually, \$2.1 million start-up. This estimate includes activation of up to 12 center-days (12 centers for one day, 4 centers for 3 days, or similar combinations), with 200 persons in attendance at each at \$25 per person. Round trip transportation of life-support customers is estimated at \$1,000 per person for up to 100 customers (approximately 10% of the Medical Baseline customer count).

Electric Operations, a recurring annual range of approximately \$5.3 to \$7.7 million and a start-up cost of \$12.9 to \$24.0 million consisting of:

- Field operations, including electric crew standby and circuit patrolling, Distribution Operations Center incremental manning and Emergency Operations Center preparations, approximately \$2.4 to \$4.8 million annually. This range is dependent on the scope of red flag weather conditions preceding an EPSO event and the number, placement and duration of personnel throughout the potential EPSO service territory.
- Weather monitoring, including additional weather stations and annual costs for licensing and maintenance of weather monitoring software, approximately \$0.1 million annually, \$0.6 to \$1.1 million start-up. This estimate includes the addition and annual maintenance of 13 weather stations, and the subscription to specialized weather service reporting.
- Electric system configuration, including re-routing and equipment costs to increase the sectionalizing of distribution circuits, development of additional mapping data for operational use and on the SDG&E Web site, improved sectionalizing of the system using pulse closer devices, added SCADA equipment and service restorers, approximately \$2.8 million annually, \$12.3 to \$22.9 million start-up. This range is dependent on the speed of acquisition and installation of new sectionalizing devices and circuit hardening, whether completed primarily during 2009 or over the course of several years.

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Question 5:

The following information for each of the 13 power line fires since August 2003 that is associated with a high-wind event: (a) Date the fire started; (b) location; (c) size in acres; (d) extent of any injuries or property damage, if known; (e) how the fire was ignited; (f) why SDG&E believes the fire is associated with a high-wind event; and (g) why SDG&E believes de-energization might have prevented the fire.

SDG&E Response:

The information for (a) – (f) is provided in the Table that follows. For (f), SDG&E does not have quantifiable criteria as wind speeds have not been tracked in the reporting system in the past. The rationale for consideration as a “high-wind event” comes from incident reports for each fire.

For (g) regarding “Why SDG&E believes de-energization might have prevented the fire” in relation to the 13 high-wind events, one must consider that de-energization (now referred to as the Emergency Power Shut-Off Plan) is only one part of SDG&E’s broader Community Fire Safety Program. Emergency Power Shut-Off is the final measure triggered only under limited circumstances of high fire risk conditions depending upon whether the five fire and weather criteria have been met. Therefore, a backcast analysis limited exclusively to de-energization criteria would yield an incomplete picture as to whether a line might have been de-energized and a potential ignition source possibly eliminated. The progressive process that comprises the broader Community Fire Safety Program is intended to continually reduce the risk of a power line ignition source as weather conditions move towards the extreme. A backcast analysis also fails to consider that in the future, the Emergency Power Shut-Off Plan will also benefit from additional RAWs (weather station) sites. Therefore, the additional weather information, had it been available in the past, might also mean that emergency shut-off could have been triggered and a power line ignition source potentially eliminated had that information been available then. Recognizing the limitations of this backcast review, in three cases (#5200, #5327, and #5325) all five of the current triggers in the de-energization plan could have been met.

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Inc. Number	Date Started	Location	Size in Acres	Injuries or property damage from fire	How the fire was ignited	Why it is considered a wind event (source of information)
5199	12/16/2004	Wynola	5	No injuries or damage noted	Power line down	Power line down from heavy winds (fire details)
5200	12/16/2004	Descanso	1	No injuries or damage noted	Power line down	Line down from high winds (fire details)
5201	12/17/2004	Ramona	1	No injuries or damage noted	Power line down	High winds (fire details)
5069	2/19/2005	Fallbrook	1	No injuries or damage noted	Tree branch into power line	Wire down from wind storm (fire details)
5048	2/7/2006	Laguna Niguel	1	No injuries or damage noted	Tree branch into power line	High wind tree caused outage (fire details)
5185	6/27/2006	Fallbrook	1	No injuries or damage noted	Tree branch into power line	Broken limb from heavy winds (cause details)
5242	10/27/2006	Boulder Creek	2	No injuries or damage noted	Power line down	Strong winds in area (fire details)
5250	11/30/2006	San Ysabel	130	Damage to bridge and loss of pasture land	Power line down	High winds 40 mph w/gusts to 60 mph (fire details)
5251	12/27/2006	Camp Pendleton	3	No injuries or damage noted	Power line down	Static line down result of high winds (fire details)
5261	3/3/2007	Jamul	0.1	No injuries or damage noted	Tree branch into power line	Eucalyptus failed in high winds (fire details)
5327	10/21/2007	Guejito, San Pasqual	197990*	Extensive property damage and injuries*	Alleged contact w/ conductor	Very high winds observed in area (observations & reports)
5322	10/21/2007	Witch, Ramona	197990*	Extensive property damage and injuries*	Alleged arcing power lines	Heavy Santa Ana winds (fire details)
5325	10/22/2007	Rice, Rainbow	9472	Extensive property damage and injuries	Alleged tree branch into power line	Tree break-out due to heavy winds (fire details)
				*Witch and Guejito acreage, injuries, and damage are aggregated based on estimates of the areas involved in the two fires pursuant to the current information available from Cal Fire.		

VERIFICATION

I, David L. Geier, am an officer of the applicant corporation herein, to wit: Vice President – Electric Transmission & Distribution – San Diego Gas & Electric Company, and am authorized to make this verification on its behalf. The content of this document is true, except as to matters that are stated on information and belief. As to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 10, 2009 at San Diego, California.

/s/ DAVID L. GEIER _____

David L. Geier
Vice President –
Electric Transmission & Distribution

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the attached **SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) UPDATE TO INFORMATIONAL FILING** to each party of record on the service list in A.08-12-021 via electronic mail.

Copies of the Reply Comments were sent via Federal Express to the Administrative Law Judge in this proceeding.

Dated at San Diego, California, this 10th day of April, 2009.

/s/ JOEL DELLOSA

Joel Dellosa