

CUE DATA REQUEST
CUE-SDG&E-DR-01
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE
DATE RECEIVED: MARCH 6, 2015
DATE RESPONDED: MARCH 20, 2015

I. POLES

SDG&E indicates planned pole replacements at numerous places in its testimony (e.g., Ex. 9 workpapers, pp. 311, 756, 789, 856, 868, 876, 884, 913, 923, 933, and others). Please provide the following aggregate information:

1. Please identify how many wood distribution poles are on SDG&E's system as of year-end 2014, in total and by date of installation (e.g., 100 poles installed in 1920, 200 poles installed in 1921, etc).

SDG&E Response:

See attached spreadsheet (CUE-SDG&E-DR-01 Supplemental Info).

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2. Please identify how many steel distribution poles are on SDG&E's system as of year-end 2014, in total and by date of installation (e.g., 100 poles installed in 1920, 200 poles installed in 1921, etc).

SDG&E Response:

See attached spreadsheet (CUE-SDG&E-DR-01 Supplemental Info)

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3. Please identify how many other (non-wood, non-steel, e.g. Cellon) distribution poles are on SDG&E's system as of year-end 2014, in total and by date of installation (e.g., 100 poles installed in 1920, 200 poles installed in 1921, etc).

SDG&E Response:

See attached spreadsheet (CUE-SDG&E-DR-01 Supplemental Info)

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4. To the extent the total number of distribution poles identified in the previous three responses is significantly different from the estimated total pole count of 240,000 in SDG&E's GRC filing, please provide an explanation of the discrepancy.

SDG&E Response:

The disparity addressed in Question 4 comes from not counting the number of structures that are classified as towers, stub poles, underground streetlights, etc.

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5. Please identify how many wood transmission poles are on SDG&E's system as of year-end 2014, in total and by date of installation (e.g., 100 poles installed in 1920, 200 poles installed in 1921, etc).

SDG&E Response:

SDG&E is not requesting funding for Electric Transmission expenses in this GRC, those costs are authorized through FERC. FERC jurisdictional costs are not within the scope of this proceeding, SDG&E therefore objects to this request as not reasonably tailored to lead to admissible evidence.

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6. Please identify how many steel transmission poles are on SDG&E's system as of year-end 2014, in total and by date of installation (e.g., 100 poles installed in 1920, 200 poles installed in 1921, etc).

SDG&E Response:

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7. Please identify how many other (non-wood, non-steel, e.g. Cellon) transmission poles are on SDG&E's system as of year-end 2014, in total and by date of installation (e.g., 100 poles installed in 1920, 200 poles installed in 1921, etc).

SDG&E Response:

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8. What percentage of SDG&E's wood transmission poles have distribution underbuild?

SDG&E Response:

There are 5247 wood transmission poles with distribution underbuild, making the percentage with underbuild approximately 59%.

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9. What was the total number of wood distribution poles replaced, for all causes combined, in each of the years 2009-14, inclusive:
- a. Replaced with wood; and
 - b. Replaced with steel. 1011-985cv

SDG&E Response:

See attached spreadsheet (CUE-SDG&E-DR-01 Supplemental Info)

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10. What was the total number of non-wood distribution poles replaced, for all causes combined, in each of the years 2009-14, inclusive.

SDG&E Response:

The requested number is not known. It is not possible to determine precisely the number of non-wood distribution poles replaced without conducting an exhaustive discrete search of several records sources (work orders, field memos, and/or other documents including hardcopy records), that is estimated to require between 1 and 2 months. SDG&E began replacing wood poles with steel for fire risk reduction reasons in the 2007-2008 period, and normally the only reason to replace a non-wood pole would have been due to car-pole contacts (causing damage to a steel pole), due to relocations, or due to equipment additions triggering pole replacement due to pole loading issues. This number is likely very small relative to the total population of poles in the system.

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11. How many, if any, replacements of non-wood distribution poles were wood poles?

SDG&E Response:

The requested number is not known. SDG&E's GIS system can be queried to determine what type of poles (e.g. steel, wood, fiberglass, etc.) are in place currently. It is pretty straight forward to determine how many wood poles have been replaced with steel, as the majority of the pole population was wood up until the 2007-2008 timeframe, at which point SDG&E began replacing wood poles with steel for fire risk reduction reasons. It would be very difficult to determine the number of non-wood distribution poles have been replaced with wood poles, if any. Only in a rare case would an engineered structure (e.g. steel, fiberglass) be replaced with a wood pole. If this has occurred in SDG&E's system, this number is likely very small relative to the total population of poles in the system. In a similar fashion as shown in Question 11, to determine the actual quantity SDG&E would have to perform an exhaustive manual search of work orders, field memos, and/or other documents to determine where non-wood poles were replaced, let alone with a wood pole. At this point, SDG&E is unable to respond to this question in the time allotted. Research of this nature could take 1-2 months.

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12. What was the total number of wood transmission poles replaced, for all causes combined, in each of the years 2009-14, inclusive:
- a. Replaced with wood; and
 - b. Replaced with steel.

SDG&E Response:

SDG&E is not requesting funding for Electric Transmission expenses in this GRC, those costs are authorized through FERC. FERC jurisdictional costs are not within the scope of this proceeding; SDG&E therefore objects to this request as not reasonably tailored to lead to admissible evidence.

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13. What was the total number of non-wood transmission poles replaced, for all causes combined, in each of the years 2009-14, inclusive.

SDG&E Response:

SDG&E is not requesting funding for Electric Transmission expenses in this GRC, those costs are authorized through FERC. FERC jurisdictional costs are not within the scope of this proceeding; SDG&E therefore objects to this request as not reasonably tailored to lead to admissible evidence.

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14. For 2015, how many of each of the following kinds of pole replacements does SDG&E plan, from all causes combined:
- a. Wood distribution poles replaced with wood;
 - b. Wood distribution poles replaced with steel;
 - c. Steel distribution poles;
 - d. Non-wood, non-steel distribution poles;
 - e. Wood transmission poles replaced with wood;
 - f. Wood transmission poles replaced with steel;
 - g. Steel transmission poles; and
 - h. Other (please specify).

SDG&E Response:

For parts a-d, the answers are as follows:

- a. 330
- b. 3,552
- c. This number will likely be very small, since the only time a steel pole would be replaced is due to car-pole contact, pole replacements due to additional load being added, or other unforeseen event. A number cannot be provided at this time.
- d. None at this time.

For parts e-g, the answer is as follows:

SDG&E is not requesting funding for Electric Transmission expenses in this GRC, those costs are authorized through FERC. FERC jurisdictional costs are not within the scope of this proceeding, SDG&E therefore objects to this request as not reasonably tailored to lead to admissible evidence.

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15. For 2016, how many of each of the following kinds of pole replacements does SDG&E plan, from all causes combined:
- a. Wood distribution poles replaced with wood;
 - b. Wood distribution poles replaced with steel;
 - c. Steel distribution poles;
 - d. Non-wood, non-steel distribution poles;
 - e. Wood transmission poles replaced with wood;
 - f. Wood transmission poles replaced with steel;
 - g. Steel transmission poles; and
 - h. Other (please specify).

SDG&E Response:

For parts a-d, the answers are as follows:

- a. 470
- b. 4,362
- c. This number will likely be very small, since the only time a steel pole would be replaced is due to car-pole contact, pole replacements due to additional load being added, or other unforecasted event. A number cannot be provided at this time.
- d. None at this time.

For parts e-g, the answer is as follows:

SDG&E is not requesting funding for Electric Transmission expenses in this GRC, those costs are authorized through FERC. FERC jurisdictional costs are not within the scope of this proceeding, SDG&E therefore objects to this request as not reasonably tailored to lead to admissible evidence.

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17. For distribution poles, SDG&E projects an average service life of 47 years (Ex. 28, p. 38). In 2015, to replace 1/47 of its distribution poles, how many poles would SDG&E have to replace that year? 1011-985cv

SDG&E Response:

LIFE studies are completed using historical data. Depreciation studies are not a forecast nor do they portend to forecast future activity. As implied on page 38 (Ex. 28 Depreciation), as additional historic recorded plant activity is recorded beyond 2013, that detail will be included in developing future LIFE studies. LIFE studies are not a tool in developing planned replacement activity.

Account E364 includes “the cost to install poles, towers, and appurtenant fixtures used for supporting overhead distribution conductors and service wires. Fixture components included items such as anchors, head arms, and other guys, including guy guards, guy clamps, strain insulators, pole plates, brackets, cross-arms and braces.” The LIFE study for FERC E364 is historically influenced by all these assets.

Simply put, the 47 R0.5 (Life and Iowa Curve) does not dictate future activity for this FERC account. Ongoing LIFE studies will continue to capture future historical activity eventually influencing the ASL and Iowa curve going forward.

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18. For distribution poles, SDG&E projects an average service life of 47 years (Ex. 28, p. 38). In 2015, to replace 1/47 of its distribution poles, how many poles would SDG&E have to replace that year?

SDG&E Response:

See the response to Question 17.

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19. For distribution poles, SDG&E projects an average service life of 47 years (Ex. 28, p. 38). Please provide, if available, the expected service lives which in the aggregate produce that 47 year life expectation:
- a. Service life for wood poles;
 - b. Service life for steel poles; and
 - c. Service life for non-wood, non-steel poles.

SDG&E Response:

Life studies completed for E364 do not categorize nor differentiate this detail.