

PUBLIC ADOVCATES OFFICE DATA REQUEST: CALPA-SDG&E-01
2020 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE

Date Received: February 20, 2020
Date Submitted: February 24, 2020

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, 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.
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.

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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.

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 and for no other purpose.

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III. RESPONSES

QUESTION 1:

Please clarify how SDG&E uses the terms “ignition” and “near miss” in SDG&E’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division).

- a. Does SDG&E use the term “ignition” as synonymous with “CPUC-Reportable Event”?¹
- b. If the answers to question 1a is no, please provide SDG&E’s definition of “ignition” as used in SDG&E’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division).

RESPONSE 1:

- a. Yes.
- b. Not applicable, please refer to the response to Q1(a) above.

¹ D.14-02-015, *Decision Adopting Regulations to Reduce the Fire Hazards Associated with Overhead Electric Utility Facilities and Aerial Communications Facilities*, issued February 5, 2014 in R.08-11-005, p. C-3:

“CPUC-Reportable Event” means “any event where utility facilities are associated with the following conditions: (a) A self-propagating fire of material other than electrical and/or communication facilities, and (b) The resulting fire traveled greater than one linear meter from the ignition point, and (c) The utility has knowledge that the fire occurred. Ignition Point is the location, excluding utilities facilities, where a rapid, exothermic reaction was initiated that propagated and caused the material involved to undergo change, producing temperatures greatly in excess of ambient temperature.”

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QUESTION 2:

Please clarify how SDG&E uses the term “near miss” in SDG&E’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division),

- a. Does SDG&E use “near miss” as defined in the December 16, 2019 WMP Guidelines?²
- b. If the answer to question 2a is yes, please explain how SDG&E determines whether an event entails “significant probability of ignition.”
- c. If the answer to question 2a is no, please provide SDG&E’s definition of “near miss” as used in SDG&E’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division).

RESPONSE 2:

- a. Yes.
- b. The definition of near miss is broader than “significant probability of ignition,” the complete definition from the WMP Guidelines (at 11) states:

“An event with significant probability of ignition, including wires down, contacts with objects, line slaps, events with evidence of heat generation, and other events that cause sparking or have the potential to cause ignition”

Given this broad definition, SDG&E interpreted near miss to be any electrical fault on the system, as every electrical fault on the overhead transmission and distribution system has the potential to cause an ignition. This is in alignment with SDG&E’s WMP Table 11 which breaks out electrical faults by causes (such as balloon contact) and in the same table asks how many of those near misses led to ignitions.

- c. Not applicable, please see the response to Q2(a) above.

² *Administrative Law Judge’s Ruling on Wildfire Mitigation Plan Templates and Related Material and Allowing Comment*, R.18-10-007 December 16, 2019, Attachment 1, WMP Guidelines, (December 16, 2019 WMP Guidelines) p. 11.

“Near miss” means “An event with significant probability of ignition, including wires down, contacts with objects, line slap, events with evidence of significant heat generation, and other events that cause sparking or have the potential to cause ignition.”

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QUESTION 3:

Please explain how SDG&E distinguishes between an ignition and a near miss.

RESPONSE 3:

SDG&E defines an ignition consistent with a CPUC Reportable Event as outlined in D.14-02-015. See n.1 in Q1 above. A near miss is an electrical fault on the overhead transmission or distribution system that did not result in a CPUC Reportable Event.