

PUBLIC ADVOCATES OFFICE DATA REQUEST: CALPA-SDGE-03
2020 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE

Date Received: March 20, 2020

Date Submitted: March 25, 2020

Date Amended: April 3, 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

SDG&E amends its response to this data request based on a request for clarification received from CalPA on March 26, 2020. CalPA clarified that they are interested in data for existing overhead to underground conversion as opposed to new installations. SDG&E's original response provided the mileage and costs of both new undergrounding and overhead to underground conversions. The amended data provided in redline below is specific to SDG&E's Rule 20A conversion program, where the undergrounding takes place in urban settings.

As discussed in SDG&E's 2020 WMP at Section 5.3.3.16, SDG&E has established a Strategic Undergrounding program to target areas of the high fire threat district and where feasible, convert overhead to underground. Infrastructure feasibility assessment is ongoing, and pilot projects are in progress to provide a baseline for scope, cost, and schedule for the overall program. Assessment of cost savings and types of construction methods to determine the appropriate design approach to environmentally sensitive locations and potentially non-advantageous terrain (e.g., granite rock, equipment up a hillside) are also being considered. SDG&E has experience undergrounding lines in urban settings where franchise agreements with the cities and counties are in place to help expedite these projects. In the more rural settings, there are challenges associated with undergrounding overhead lines. SDG&E cannot simply follow the existing overhead lines but must go through existing roads. Other cost considerations would include the potential need to acquire underground easements on private roads, tribal lands, and other jurisdictional territory.

QUESTION 1:

Please provide five years of historical data (2015-2019) regarding:

- a) the total mileage of undergrounding of existing circuits that SDG&E completed, and
- b) the average cost per mile by year.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2 and 5. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 1:

- a) Using SDG&E's largest conversion program (Rule 20A), the total mileage of undergrounding of existing circuits that SDG&E has completed from 2015-2019 is as follows:

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Year	Underground Mileage
2015	205 <u>5.4</u>
2016	177 <u>10.9</u>
2017	185 <u>9.3</u>
2018	244 <u>1.8</u>
2019	192 <u>11.3</u>

The average cost per mile by year is as follows:

Year	Average Cost per Underground Mile
2015	\$2,203,000 <u>\$2,811,129</u>
2016	\$2,074,000 <u>\$2,418,084</u>
2017	\$2,212,000 <u>\$2,663,996</u>
2018	\$2,080,000 <u>\$2,212,731</u>
2019	\$2,541,000 <u>\$2,385,576</u>