

**MUSSEY GRADE ROAD ALLIANCE DATA REQUEST: MGRA-SDGE-02**  
**2020 WILDFIRE MITIGATION PLAN**  
**SDG&E RESPONSE**

**Date Received: March 18, 2020**  
**Date Submitted: March 23, 2020**

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**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 provide a full definition of the Fire Potential Index (FPI) used by your utility or provide relevant citations.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 1:**

A full and comprehensive definition of the Fire Potential Index is included in SDG&E's 2020 Wildfire Mitigation Plan in Section 4.2 under the headline *Monitoring Contribution of Weather to Ignition Probability and Estimated Wildfire Consequence*, beginning on page 20.

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**QUESTION 2:**

Provide a quantitative description how estimated peak wind gust speed (determined through either modelling or measurement) affects the Fire Potential Index.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 2:**

Peak wind gust speed is not taken into consideration when calculating the Fire Potential Index. The Fire Potential Index is calculated using a spatial average of the sustained winds across our operating districts.

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**QUESTION 3:**

Does your utility track multiple wildfire risk prioritizations per circuit, broken into individual risk, or calculate an aggregate risk score?

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 3:**

SDG&E's Wildfire Risk Reduction Model (WRRM) model breaks down risk to the asset class level. Asset class includes conductors by size and type, poles, equipment such as fuses, capacitors and transformers etc. The risk calculation is broken down into many subfactors.

$$\text{Risk} = \text{Ignition Likelihood} * \text{Impact}$$

$$\text{Ignition Likelihood} = \text{Asset Failure Rate} * \text{Ignition Ratio}$$

The asset failure rates are broken down by asset specific information such asset type, age, condition, historical failure rates, and weather impacts. Ignition ratio is calculated through asset specific ignition history based on the fault that caused the ignition, as well as an approximation of the grid surface fuels in the area. The impact side is calculated by the individual fire spread simulations at the asset where the ignition occurs and quantified by the acreage and structures (dwellings and SDG&E assets) burned.

To get the circuit level risk, all circuit asset risk is aggregated to the circuit level and then normalized by the miles of circuit.

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**QUESTION 4:**

For your vegetation management program, please list the following summary data for customer refusals between 2015 and 2019:

- a) Total number of refusals
- b) Number of refusals resolved by customer outreach
- c) Number of refusals resolved by forced action, such as court orders
- d) Number of refusals resolved by other means
- e) Number of refusals unresolved (or no trim)
- f) Average time between customer refusal and final trim

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 4:**

The following data pertains to customer refusals between 2015 and 2019:

- a) There were approximately 520 customer refusals.
- b) There were approximately 120 refusals, which were resolved directly by SDG&E's contractor through customer outreach.
- c) One refusal was resolved by forced action.
- d) Approximately 300 refusals were escalated from SDG&E's contractor and resolved by an SDG&E Area Forester.
- e) Approximately 100 of refusals were unresolved.
- f) The average time between a customer refusal and final trim was approximately one month.

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**QUESTION 5:**

Please provide a list of outages including circuit identifier, including cause information, as per Section 5.3.7.4.2. If georeferenced outage information is available, please provide this as a GIS layer. Note that PG&E has provided outage information as a non-confidential GIS layer.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9.

**RESPONSE 5:**

Location of asset faults for 2015-2019 is provided in the attached: "MGRA-SDGE DR 2 Q5.gdb.7z."

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**QUESTION 6:**

Regarding Table 17: When SDG&E discusses “hardening” does this refer to covered conductor?

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9.

**RESPONSE 6:**

Hardening refers to SDG&E’s major system hardening programs, including all the work being performed by the Cleveland National Forest (CNF) project, the overhead hardening program (which includes covered conductor), and the underground hardening program. For specifics of how much of each type SDG&E plans to perform each year, please see SDG&E’s 2020 WMP, Appendix A at Table 23 which breaks down the mileage for each specific mitigation.



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**QUESTION 7:**

Please provide Chapter 4, Figure 1 “SDG&E Known Local Wind Conditions Map” as a GIS file.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 7:**

Please see attachment: “MGRA-SDGE DR 2 Q7.gdb.”

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**QUESTION 8:**

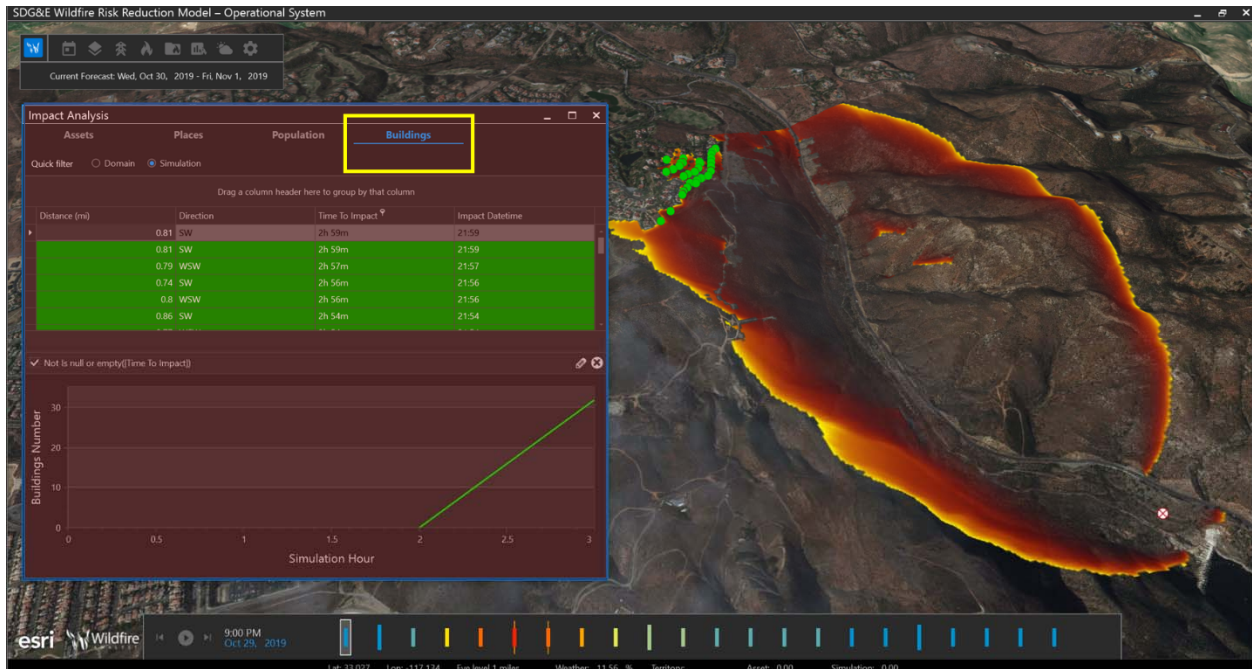
In Chapter 5, Figure 5 appears identical to Figure 6. Is this supposed to be the case and if not please provide a corrected figure.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 8:**

Regarding Figure 5 and Figure 6 in SDG&E's 2020 WMP, Figure 5 was inadvertently duplicated in Figure 6. The correct Figure 6 is provided below. SDG&E will inform Wildfire Safety Division and parties of this errata in its WMP weekly update email and will coordinate with the Wildfire Safety Division on when to formally incorporate this corrected figure into its WMP.



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**QUESTION 9:**

Regarding SDG&E's undergrounding program discussed in 5.3.3.16, of the 120 miles of planned underground cabling, how much is planned in the HFTD? In Tier 2? In Tier 3?

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 9:**

SDG&E initiated its Strategic Undergrounding Program approximately eight months ago. While SDG&E anticipates installing 120 miles of planned undergrounding/cabling, not all of the projects have been scoped. Below is an estimate of where SDG&E plans to install the 120 miles of undergrounding/cabling.

- Mileage scoped in HFTD: 85 miles
- Mileage scoped in Tier 3: 63 miles
- Mileage scoped in Tier 2: 22 miles

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**QUESTION 10:**

Provide the data indicating showing the relationship between outages and trim distance that forms the basis of SDG&E's 25-foot trim distance: Provide a table of vegetation-related outages, including where available columns for:

- a) tree species
- b) distance of trunk from impacted conductor/asset
- c) estimated distance of contacting branch from conductor/asset prior to outage.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 10:**

Please see attachment "MGRA-SDGE DR 2 Q10.xlsx," which provides the requested information for 2015-2019.