

**PUBLIC ADVOCATES OFFICE DATA REQUEST: CALPA-SDGE-02
2021 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

**Date Received: January 22, 2021
Date Submitted: February 15, 2021**

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

As this data request relates to SDG&E's Wildfire Mitigation Plan (WMP), which sets forth programs and initiatives that are generally focused in the High Fire Threat District (HFTD), the information and numbers provided in response are focused on the HFTD.

QUESTION 1:

- a) How many SDG&E employees were qualified to perform climbing inspections of transmission towers as of January 1, 2021?
- b) How many SDG&E contractors were qualified to perform climbing inspections of transmission towers as of January 1, 2021?
- c) How frequently are SDG&E employee climbing inspectors of transmission towers requalified?
- d) How frequently are SDG&E contractor climbing inspectors of transmission towers requalified?
- e) Please respond to questions 1(a) and 1(b) with the appropriate numbers that correspond to January 1 of:
 - a. 2018.
 - b. 2019.
 - c. 2020.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 1:

- a. SDG&E had the following number of employees qualified to perform climbing inspections of transmission towers as of January 1 of each year.

Year	Number of Employees
2021	15
2020	10
2019	13
2018	15

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- b. From January 1, 2018 through January 1, 2021, no SDG&E contractors were qualified to perform climbing inspections of transmission towers.
- c. SDG&E employees are requalified to perform climbing inspections of transmission towers annually.
- d. SDG&E does not utilize contractors to perform climbing inspections of transmission towers.
- e. Please refer to the response to Questions 1(a) and 1(b) above.

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QUESTION 2:

- a) How many SDG&E employees were qualified to perform drone inspections of transmission towers as of January 1, 2021?
- b) How many SDG&E contractors were qualified to perform drone inspections of transmission towers as of January 1, 2021?
- c) How frequently are SDG&E employee drone inspectors of transmission towers requalified?
- d) How frequently are SDG&E contractor drone inspectors of transmission towers requalified?
- e) Please respond to questions 2(a) and 2(b) with the appropriate numbers that correspond to January 1 of:
 - i. 2018.
 - ii. 2019.
 - iii. 2020.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 2:

- a. SDG&E had the following number of employees qualified to perform drone inspections of transmission towers as of January 1 of each year. The actual inspections were completed by a Qualified Electrical Worker (QEW). Please note that SDG&E did not have drone inspections in 2018 and 2019.

Year	Number of Employees
2021	6
2020	6
2019	N/A
2018	N/A

- b. SDG&E had the following number of contractor crews (Remote Pilot in Command (RPIC) and visual observer) qualified to perform drone inspections of transmission towers as of January 1 of each year. The actual inspections were completed by a QEW.

Year	Number of Employees
2021	19
2020	19
2019	N/A

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2018	N/A
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- c. Drone pilots have to requalify annually and fly every 60 days to stay active.
- d. Under Federal Aviation Administration (FAA) regulations (14 Code of Federal Regulations part 107), drone pilots need to take a recurrent knowledge test every two years. SDG&E requires its drone pilots to have Transmission & Distribution (T&D) flight hours within the past 90 days or be requalified.

With each new phase, QEW inspectors need to go through new qualification process. Tier 3 HFTD inspections were Phase 1. Transmission inspections required requalification. Inspectors will need to go through new qualification process for Tier 2 HFTD inspections.

- e. Please refer to the response to Questions 2(a) and 2(b) above.

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QUESTION 3:

- a) How many SDG&E employees were qualified to perform detailed ground inspections of transmission towers as of January 1, 2021?
- b) How many SDG&E contractors were qualified to perform detailed ground inspections of transmission towers as of January 1, 2021?
- c) How frequently are SDG&E employee detailed ground inspectors of transmission towers requalified?
- d) How frequently are SDG&E contractor detailed ground inspectors of transmission towers requalified?
- e) Please respond to questions 3(a) and 3(b) with the appropriate numbers that correspond to January 1 of:
 - i. 2018.
 - ii. 2019.
 - iii. 2020.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 3:

- a. SDG&E had the following number of employees qualified to perform detailed ground inspections of transmission towers as of January 1 of each year.

Year	Number of Employees
2021	15
2020	10
2019	13
2018	15

- b. From January 1, 2018 through January 1, 2021, no SDG&E contractors were qualified to perform detailed ground inspections of transmission towers.
- c. SDG&E employees are requalified to perform detailed ground inspections of transmission towers annually.
- d. SDG&E does not utilize contractors to perform detailed ground inspections of transmission towers.

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- e. Please refer to the response to Questions 3(a) and 3(b) above.

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QUESTION 4:

Please provide the following:

- a) The average amount of person-hours to perform a single climbing inspection of a transmission tower in 2020.
- b) The minimum amount of person-hours spent on a single climbing inspection of a transmission tower in 2020.
- c) The total amount of person-hours spent on climbing inspections of transmission towers in 2020.
- d) The total number of transmission towers that SDG&E performed climbing inspections on in 2020.
- e) The total number of climbing inspections of transmission towers performed in 2020.
- f) Please respond to questions 4(a) through 4(e) for:
 - i. 2018.
 - ii. 2019.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 4:

- a. The following summarizes the average amount of person-hours to perform a single climbing inspection of a transmission tower:

Year	Number of Hours
2020	12
2019	12
2018	12

- b. The following summarizes the minimum amount of person-hours spent on a single climbing inspection of a transmission tower:

Year	Number of Hours
2020	6
2019	6
2018	6

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- c. The following summarizes the total amount of person-hours spent on climbing inspections of transmission towers:

Year	Number of Hours
2020	576
2019	564
2018	528

- d. The following summarizes the total number of transmission towers that SDG&E performed climbing inspections on:

Year	Number of Transmission Towers
2020	48
2019	47
2018	44

- e. The following summarizes the total number of climbing inspections of transmission towers:

Year	Number of Inspections
2020	48
2019	47
2018	44

- f. Please refer to the response to Questions 4(a) and 4(e) above.

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QUESTION 5:

Please provide the following:

- a) The average amount of person-hours to perform a single drone inspection of a transmission tower in 2020.
- b) The minimum amount of person-hours spent on a single drone inspection of a transmission tower in 2020.
- c) The total amount of person-hours spent on drone inspections of transmission towers in 2020.
- d) The total number of transmission towers that SDG&E performed drone inspections on in 2020.
- e) The total number of drone inspections of transmission towers performed in 2020.
- f) Please respond to questions 5(a) through 5(e) for:
 - i. 2018.
 - ii. 2019.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 5:

- a. The following summarizes the average amount of person-hours to perform a single drone inspection of a transmission tower:

Year	Number of Hours
2020	1-1.5
2019	N/A
2018	N/A

- b. The following summarizes the minimum amount of person-hours spent on a single drone inspection of a transmission tower:

Year	Number of Hours
2020	30-45 minutes
2019	N/A
2018	N/A

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- c. The following summarizes the total amount of person-hours spent on drone inspections of transmission towers (for RPIC and visual observer):

Year	Number of Hours
2020	4,641
2019	N/A
2018	N/A

- d. The following summarizes the total number of transmission towers that SDG&E performed climbing inspections on:

Year	Number of Transmission Towers
2020	1,460
2019	N/A
2018	N/A

- e. The following summarizes the total number of climbing inspections of transmission towers:

Year	Number of Inspections
2020	1,460
2019	N/A
2018	N/A

- f. Please refer to the response to Questions 5(a) and 5(e) above.

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QUESTION 6:

Please provide the following:

- a) The average amount of person-hours to perform a single detailed ground inspection of a transmission tower in 2020.
- b) The minimum amount of person-hours spent on a single detailed ground inspection of a transmission tower in 2020.
- c) The total amount of person-hours spent on detailed ground inspections of transmission towers in 2020.
- d) The total number of transmission towers that SDG&E performed detailed ground inspections on in 2020.
- e) The total number of detailed ground inspections of transmission towers performed in 2020.
- f) Please respond to questions 6(a) through 6(e) for:
 - i. 2018.
 - ii. 2019.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 6:

- a. The following summarizes the average amount of person-hours to perform a single detailed ground inspection of a transmission tower:

Year	Number of Hours
2020	35 minutes
2019	30 minutes
2018	30 minutes

- b. The following summarizes the minimum amount of person-hours spent on a single detailed ground inspection of a transmission tower:

Year	Number of Hours
2020	10 minutes
2019	10 minutes
2018	10 minutes

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- c. The following summarizes the total amount of person-hours spent on detailed ground inspections of transmission towers:

Year	Number of Hours
2020	1,262
2019	1,188
2018	1,024

- d. The following summarizes the total number of transmission towers that SDG&E performed detailed ground inspections on:

Year	Number of Structures
2020	2,163
2019	2,376
2018	2,047

- e. The following summarizes the total number of detailed ground inspections of transmission towers:

Year	Number of Structures
2020	2,163
2019	2,376
2018	2,047

- f. Please refer to the response to Questions 6(a) and 6(e) above.

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QUESTION 7:

- a) How many Level 1 corrective tags were issued as a result of transmission tower climbing inspections in 2020?
- b) How many Level 2 corrective tags were issued as a result of transmission tower climbing inspections in 2020?
- c) Please respond to questions 7(a) through 7(b) for:
 - i. 2018.
 - ii. 2019.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 7:

- a. The following summarizes the number of Level 1 corrective tags issued as a result of transmission tower climbing inspections:

Year	Number of Tags
2020	0
2019	0
2018	0

- b. The following summarizes the number of Level 2 corrective tags issued as a result of transmission tower climbing inspections:

Year	Number of Tags
2020	8
2019	7
2018	9

- c. Please refer to the response to Questions 7(a) and 7(b) above.

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QUESTION 8:

- a) How many Level 1 corrective tags were issued as a result of transmission tower drone inspections in 2020?
- b) How many Level 2 corrective tags were issued as a result of transmission tower drone inspections in 2020?
- c) Please respond to questions 8(a) through 8(b) for:
 - i. 2018.
 - ii. 2019.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 8:

- a. The following summarizes the number of Level 1 corrective tags issued as a result of transmission tower drone inspections:

Year	Number of Tags
2020	2
2019	0
2018	0

- b. The following summarizes the number of Level 2 corrective tags issued as a result of transmission tower drone inspections:

Year	Number of Tags
2020	19
2019	0
2018	0

- c. Please refer to the response to Questions 8(a) and 8(b) above.

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QUESTION 9:

- a) How many Level 1 corrective tags were issued as a result of transmission tower detailed ground inspections in 2020?
- b) How many Level 2 corrective tags were issued as a result of transmission tower detailed ground inspections in 2020?
- c) Please respond to questions 9(a) through 9(b) for:
 - i. 2018.
 - ii. 2019.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 9:

- a. The following summarizes the number of Level 1 corrective tags issued as a result of transmission tower detailed ground inspections:

Year	Number of Tags
2020	0
2019	0
2018	2

- b. The following summarizes the number of Level 2 corrective tags issued as a result of transmission tower detailed ground inspections:

Year	Number of Tags
2020	344
2019	216
2018	433

- c. Please refer to the response to Questions 9(a) and 9(b) above.

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QUESTION 10:

- a) How many Level 1 corrective tags were issued as a result of work verification or quality control of transmission tower climbing inspections in 2020?
- b) How many Level 2 corrective tags were issued as a result of work verification or quality control of transmission tower climbing inspections in 2020?
- c) Please respond to questions 10(a) through 10(b) for:
 - i. 2018.
 - ii. 2019.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 10:

Between 2018 and 2020, no corrective tags were issued as a result of work verification or quality control.

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QUESTION 11:

- a) How many Level 1 corrective tags were issued as a result of work verification or quality control of transmission tower drone inspections in 2020?
- b) How many Level 2 corrective tags were issued as a result of work verification or quality control of transmission tower drone inspections in 2020?
- c) Please respond to questions 11(a) through 11(b) for:
 - i. 2018.
 - ii. 2019.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 11:

Between 2018 and 2020, no corrective tags were issued as a result of work verification or quality control.

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QUESTION 12:

- a) How many Level 1 corrective tags were issued as a result of work verification or quality control of transmission tower detailed ground inspections in 2020?
- b) How many Level 2 corrective tags were issued as a result of work verification or quality control of transmission tower detailed ground inspections in 2020?
- c) Please respond to questions 12(a) through 12(b) for:
 - i. 2018.
 - ii. 2019.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 12:

Between 2018 and 2020, no corrective tags were issued as a result of work verification or quality control.

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QUESTION 13:

Please provide:

- a) All current training materials that SDG&E uses to train inspectors¹ for transmission tower inspections.²
- b) All current guidelines, protocols, and checklists that SDG&E directs its inspectors to use for transmission tower inspections.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 13:

- a. Please refer to “2021WMP CalPA-SDGE DR2 Q13.zip.”

For detailed transmission inspections and climbing inspections, SDG&E currently uses internal transmission lineman as opposed to contractors to perform these inspections. Those who are qualified to perform these inspections are all journeyman lineman who undergo trainings throughout the year to maintain their skill set as a lineman. Trainings for these detailed and climbing inspections all occur through field training. Inspectors are trained by construction supervisors, leads, and foreman with the assistance of highly experienced inspectors to ensure all inspectors fully understand the role and the expectations. During this training, the transmission patrol components and conditions tables are reviewed in detail to ensure all inspectors understand what they are to look for. High severity issues identified in the field are discussed in biweekly safety meetings so all lineman and inspectors are aware for any inspection work they may be completing but also to act as a second set of eyes when performing routine maintenance work.

For climbing inspections, the climbing inspection notebook is utilized for documenting the key inspection items looked at as well as completion for each structure. Prior to the beginning of each inspection, the crew’s working foreman will have a tailgate to review the scope of the inspection, safety, and all crew members responsibilities. The discussed scope includes climbers’ responsibilities to verify bolts have been tightened as well as complete a full, detailed inspection of the tower. All bolts that were noted as loose and all conditions identified that can be repaired in the field with material brought to the site

¹ “Inspectors” include employees and contractors that perform climbing, drone, or detailed ground inspectors.

² “Inspections” include climbing, drone, and detailed ground inspections.

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are completed in the field by these crews as part of the inspection. All other conditions which may require hot-end work or an outage are entered into the maintenance program to be completed in accordance with GO requirements.

- b. Please refer to “2021WMP CalPA-SDGE DR2 Q13.zip.”

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QUESTION 14:

Provide an Excel table of all Level 1 and Level 2 corrective tags issued from January 1, 2018 to December 31, 2020 (as rows) that includes the following information in separate columns:

- a) Corrective Tag ID.
- b) Circuit Name.
- c) Priority Level (1 or 2).
- d) Date corrective tag was issued.
- e) Required completion date of corrective tag.
- f) Date corrective tag was completed or resolved.³

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 14:

Please refer to “2021WMP CalPA-SDGE DR2 Q14.xlsx.”

The information provided in the provided table is based SDG&E’s transmission maintenance practice filed with CAISO. In this practice, an inspector or patrolman identifies conditions in the field and applies a severity rating based on their assessment of the condition. This rating triggers a timeline for a secondary assessment to be performed by a Foreman or Supervisor with higher severity ratings requiring a quicker secondary assessment up to and including immediate secondary assessment for critical items. When the foreman or supervisor completes the secondary inspection of the condition, they will also include a required completion date for the condition requiring repair and this is the date listed in the provided table. Based on this process, the required completion dates are labeled as “Pending Secondary Assessment” for those which have been identified for secondary assessment but have not yet been assessed.

³ For a row in which a corrective tag is not yet completed or resolved, fill in the cell associated with this column with “N/A.”