

**PUBLIC ADVOCATES OFFICE DATA REQUEST: CALPA-SDGE-05
2021 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

**Date Received: March 1, 2021
Date Submitted: March 4, 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

The following questions relate to SDG&E's 2021 Wildfire Mitigation Plan (WMP).

QUESTION 1:

In response to Public Advocates Office data request CalAdvocates-SDGE-2021WMP-03, question 3, SDG&E provided a bill impact analysis of the increase in electric costs to ratepayers due to wildfire mitigation plan activity. Using the same assumptions as this analysis, please provide a bill impact analysis for a customer living in SDG&E's hot climate zone.

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:

In its 2021 WMP Update, SDG&E provided an average bill impact estimate across Inland and Coastal climate zones. If SDG&E looked at specific bill impacts, assuming by "hot climate zone," CalPA is referring to Desert climate zone, the incremental bill impact due to wildfire mitigation plan activity is still in the same range as what was provided. This is because the rates for various tariffs are the same for customers living across all climate zones. Residential customers on Tiered rates have different baseline allowance based on the climate zone that they are in, as such customers living in desert climate zone are allotted a higher baseline quantity. Customers on Un-tiered rates will have the same bill impact across different climate zone, if evaluated for a typical consumption amount (in this response it is at 500kWh).

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QUESTION 2:

In response to Public Advocates Office data request CalAdvocates-SDGE-2021WMP-03, question 2, SDG&E stated that it does not currently have information on 2020 actual costs or 2021 and 2022 forecast costs. If this is true, state the basis of Tables 3-1 and 3-2 in Section 3 of your WMP.

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:

CalAdvocates-SDGE-2021 WMP-03 Question 2 requested the comparison of 2020 planned vs actual costs and 2021 and 2022 forecasted costs against authorized costs. Planned 2020 costs can be found in Appendix A of SDG&E's 2020 WMP Filing.¹ Actual 2020 and forecasted 2021 and 2022 costs can be found in Table 12 of SDG&E's 2021 WMP Update, as well as summarized in Tables 3-1 and 3-2. As noted in SDG&E's response to CalAdvocates-SDGE-2021 WMP-03 Question 2, SDG&E will file its Risk Spending Accountability Report with the CPUC on March 31, 2021 at which time the 2020 authorized costs will be available. The 2021 and 2022 authorized costs will not be available until March 31, 2022, and March 31, 2023, respectively.

¹ Available here: https://www.sdge.com/sites/default/files/regulatory/Appendix%20A%20-%20WMP%20Tables%201-31%20Revised%2003-02-2020_0.xlsx

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QUESTION 3:

On page (p.) 361 of SDG&E's 2021 WMP, SDG&E states that "During Extreme FPI days, in preparation of PSPS events, many of the first responder agencies including police and fire are active as part of the event. In many of these events, 2019 included, fires began in SDG&E's service territory that were not started by the utility and CAL FIRE may make a request to de-energize a line so they can more safely suppress a fire."

- a) Did CAL FIRE request that SDG&E de-energize any lines in 2020? If so, please state the number of times this occurred in 2020.
- b) Provide the total number of customer-hours in 2020 of de-energization performed at CAL FIRE's request.

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 does not track which agencies requested to de-energize lines due to infrastructure proximity to an active fire. That being said, there was one instance in 2020 where SDG&E de-energized lines due to proximity of a fire to energized lines. During most fire events that resulted in electric outages in 2020, the lines isolated themselves due to protective relay/fuse action and were left de-energized during firefighting efforts.
- b. The one event referenced above created a customer-hour impact of 5.25 customer-hours interrupted.

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QUESTION 4:

On pp. 211-212 of SDG&E’s 2021 WMP, SDG&E states that “Currently, 75 residences are confirmed to have installed generators as of the end of 2020, including one commercial site... For 2021, SDG&E plans on increasing the goal of 2020 from 300 generator installations to 413. SDG&E anticipates the 2021 program year to incorporate a portion of the remaining 2020 sites that will not complete construction by end of year 2020 and the full target of approximately 300 additional sites in 2021.”

- a) How many sites began construction in 2020 but were not complete by the end of the year?
- b) Please provide a table with the following information on each of the 75 sites installed as of the end of 2020:
 - 1. Total cost of installation;
 - 2. Size of the generators installed in kW;
 - 3. Brand or model of the generator installed;
 - 4. Type(s) of fuel that the generator uses;
 - 5. Whether the site is residential or commercial.
- c) Please describe the steps SDG&E is taking to modify the program to ensure that the program backlog does not grow in 2021.

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. In 2020, construction was completed for 75 sites; In-home consultations were completed for 97 sites and were in the pre-construction phase by the end of 2020.
- b. Please refer to the table below:

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Generator	Total Cost	Size (kW)	Brand/Model	Fuel Type	Residential or Commercial
1	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Commercial
2	\$16,325.86	22kW	Generac: Response 22kW Hero 2	Propane	Residential
3	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
4	\$15,080.04	22kW	Generac: Response 22kW Hero 2	Propane	Residential
5	\$15,068.90	22kW	Generac: Response 22kW Hero 2	Propane	Residential
6	\$15,756.80	22kW	Generac: Response 22kW Hero 2	Propane	Residential
7	\$15,749.52	22kW	Generac: Response 22kW Hero 2	Propane	Residential
8	\$15,426.87	22kW	Generac: Response 22kW Hero 2	Propane	Residential
9	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
10	\$15,403.88	22kW	Generac: Response 22kW Hero 2	Propane	Residential
11	\$14,901.41	22kW	Generac: Response 22kW Hero 2	Propane	Residential
12	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
13	\$16,217.51	22kW	Generac: Response 22kW Hero 2	Propane	Residential
14	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
15	\$15,328.69	22kW	Generac: Response 22kW Hero 2	Propane	Residential
16	\$15,042.32	22kW	Generac: Response 22kW Hero 2	Propane	Residential
17	\$18,513.24	22kW	Generac: Response 22kW Hero 2	Propane	Residential
18	\$15,719.82	22kW	Generac: Response 22kW Hero 2	Propane	Residential
19	\$15,544.80	22kW	Generac: Response 22kW Hero 2	Propane	Residential
20	\$16,182.68	22kW	Generac: Response 22kW Hero 2	Propane	Residential
21	\$15,306.31	22kW	Generac: Response 22kW Hero 2	Propane	Residential

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Generator	Total Cost	Size (kW)	Brand/Model	Fuel Type	Residential or Commercial
22	\$14,936.36	22kW	Generac: Response 22kW Hero 2	Propane	Residential
23	\$15,247.34	22kW	Generac: Response 22kW Hero 2	Propane	Residential
24	\$14,936.36	22kW	Generac: Response 22kW Hero 2	Propane	Residential
25	\$16,182.68	22kW	Generac: Response 22kW Hero 2	Propane	Residential
26	\$15,894.26	22kW	Generac: Response 22kW Hero 2	Propane	Residential
27	\$15,374.55	22kW	Generac: Response 22kW Hero 2	Propane	Residential
28	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
29	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
30	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
31	\$14,985.45	22kW	Generac: Response 22kW Hero 2	Propane	Residential
32	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
33	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
34	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
35	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
36	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
37	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
38	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
39	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
40	\$15,152.65	22kW	Generac: Response 22kW Hero 2	Propane	Residential
41	\$15,652.31	22kW	Generac: Response 22kW Hero 2	Propane	Residential
42	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential

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Generator	Total Cost	Size (kW)	Brand/Model	Fuel Type	Residential or Commercial
43	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
44	\$15,068.90	22kW	Generac: Response 22kW Hero 2	Propane	Residential
45	\$17,393.99	22kW	Generac: Response 22kW Hero 2	Propane	Residential
46	\$15,080.04	22kW	Generac: Response 22kW Hero 2	Propane	Residential
47	\$14,985.45	22kW	Generac: Response 22kW Hero 2	Propane	Residential
48	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
49	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
50	\$16,601.40	22kW	Generac: Response 22kW Hero 2	Propane	Residential
51	\$14,949.54	22kW	Generac: Response 22kW Hero 2	Propane	Residential
52	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
53	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
54	\$15,014.85	22kW	Generac: Response 22kW Hero 2	Propane	Residential
55	\$17,393.99	22kW	Generac: Response 22kW Hero 2	Propane	Residential
56	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
57	\$16,325.86	22kW	Generac: Response 22kW Hero 2	Propane	Residential
58	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
59	\$17,680.37	22kW	Generac: Response 22kW Hero 2	Propane	Residential
60	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
61	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
62	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
63	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential

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Generator	Total Cost	Size (kW)	Brand/Model	Fuel Type	Residential or Commercial
64	\$15,404.48	22kW	Generac: Response 22kW Hero 2	Propane	Residential
65	\$15,165.04	22kW	Generac: Response 22kW Hero 2	Propane	Residential
66	\$15,068.90	22kW	Generac: Response 22kW Hero 2	Propane	Residential
67	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
68	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
69	\$15,425.55	22kW	Generac: Response 22kW Hero 2	Propane	Residential
70	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
71	\$15,522.59	22kW	Generac: Response 22kW Hero 2	Propane	Residential
72	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
73	\$15,738.86	22kW	Generac: Response 22kW Hero 2	Propane	Residential
74	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential
75	\$14,566.43	22kW	Generac: Response 22kW Hero 2	Propane	Residential

- c. While it is important to maintain a lean backlog of candidates, SDG&E must also acknowledge the importance of managing an adequate pool of eligible customers in order to minimize crew downtime and maximize efficiency. To effectively manage a reasonable backlog, SDG&E has implemented the following procedural enhancements: the Fixed Backup Power (FBP) program has been able to streamline the permitting process with the County of San Diego for residential customers, which used to take anywhere from 4-8 weeks, but now takes 2 weeks. SDG&E continues to improve the entire FBP process by tightening areas of the process “funnel.” For example, another part of this process funnel is the final safety inspection, which is the very last step of this program. SDG&E is working on collaborating with the County of San Diego to perform a virtual inspection for the final safety inspection that occurs after the permitting and the generator installation. This will help speed up the final close out of the process funnel. SDG&E will continue to tighten various areas of the process funnel in 2021, with plans of increasing our weekly finalized installations.

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QUESTION 5:

Has SDG&E set a target date to complete the planned 2021 vegetation management (VM) work in HFTD areas?

- a) If yes, please provide the target date.
- b) If no, please explain why not.

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. SDG&E follows an annual master schedule for all activities. All routine work located within the HFTD will be completed in 2021 following the monthly schedule of activities.
- b. n/a

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QUESTION 6:

Has SDG&E set a target date to complete the planned 2021 enhanced vegetation management (EVM) work in HFTD areas?

- a) If yes, please provide the target date.
- b) If no, please explain why not.

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. SDG&E follows an annual master schedule for all activities. All enhanced vegetation management (EVM) work located within the HFTD will be completed in 2021 following the monthly schedule of activities.
- b. n/a

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QUESTION 7:

- a) Please describe the pay structure for vegetation management (VM) pre-inspection contractors. For example, are these contractors paid by a fixed monthly retainer, by the hour, by the mile of work completed, etc.?
- b) Is the answer to part (a) different for contractors who perform routine VM pre-inspection work and contractors who perform EVM pre-inspection work?
- c) If the answer to part (b) is yes, please explain the differences.

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 SDG&E pre-inspection contract is structured on fixed hourly rates and are typically three to five years in duration with the utility's discretion to extend. The contract takes into consideration an agreed annual escalator based on cost of living increases, contractor insurance, and fuel adjustments. The contract pay structure is further based on specific roles, worker qualification, time of service, and certifications.
- b. No.
- c. n/a

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QUESTION 8:

- a) Please describe the pay structure for vegetation management (VM) tree crew contractors. For example, are these contractors paid by a fixed monthly retainer, by the hour, by the mile of work completed, etc.?
- b) Is the answer to part (a) different for contractors who perform routine VM work and contractors who perform EVM work?
- c) If the answer to part (b) is yes, please explain the differences.
- d) Does the incentive structure for VM contractors include provisions for nonpayment or other penalties for work that fails quality control?
- e) If the answer to part (d) is yes, please explain all such provisions.

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 SDG&E contracted tree trim workforce is paid primarily by unit fixed pricing and some fixed hourly rates to perform routine tree trimming, tree removals, hazard and reliability, and emergency work. Whether work is charged by unit fixed pricing or hourly rates is determined by the scope of work as outlined in the contract. The contracts are typically three to five years with the utility's discretion to extend. Union labor agreements are factored into the contractors' annual rate increases for the duration of the contract.
- b. No.
- c. n/a
- d. There are no provisions for non-payment unless work fails quality. Work that fails quality control is corrected by the contractor at no cost to SDG&E.
- e. n/a

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QUESTION 9:

In response to Public Advocates Office DR-02, questions 4 and 5, SDG&E provided the spreadsheet “2021WMP CalPA-SDGE DR1 Q4 and Q5.xls” which includes the Wildfire Risk Level for each of SDG&E’s circuits.

The data provided by SDG&E shows that 27 circuits account for approximately 25% of SDG&E’s total wildfire risk on the distribution system, and that 56 circuits account for about 50%. The circuit names included within these quartiles are provided in attachment 1.

For each system hardening program identified in SDG&E’s 2021 WMP, please indicate:

- a) The percentage of actual 2020 program capex that was spent on each of the identified circuits.
- b) The percentage of actual 2020 program opex that was spent on each of the identified circuits.
- c) The percentage of forecast 2021 program capex that will be spent on each of the identified circuits, assuming that actual spending matches SDG&E’s forecast.
- d) The percentage of forecast 2021 program opex that will be spent on each of the identified circuits, assuming that actual spending matches SDG&E’s forecast.

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:

SDG&E noted a discrepancy in the way CalPA interpreted the data provided in “2021 WMP CalPA-SDGE DR1 Q4 and Q5.xls.” The column titled “Wildfire Risk Level” is a ranking where 1 is the riskiest circuit. SDG&E has updated the top quartile and top half of riskiest circuits to include the top 25% and top 50% ranked circuits and reported results according to this updated table, “CalPA-SDGE DR5 Q9 Circuit Risk List.”

SDG&E does not capture costs on a circuit-by-circuit basis. In order to compile this data some assumptions had to be made such as assuming that unit costs remained constant across a program. Some programs did not have this data available by circuit as they track their work using different methods such as by customer or by tree. Some programs had this data available for 2020 but not for 2021 as the completed work has been entered into our GIS system to allow for reporting by circuit.

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For responses to a-d, see attached “CalPA-SDGE DR5 Q9 Costs.”

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Topic: Non-spatial data tables: distribution inspections in HFTD areas

The following questions relate to Table 1 of the non-spatial WMP data tables. All questions specifically concern inspections of distribution facilities in HFTD areas. For purposes of this data request, “high-priority findings” mean Level 1 and Level 2 inspection findings.

QUESTION 10:

SDG&E’s Table 1 does not identify types of other distribution inspections. For each type of “other” inspection that you perform on distribution facilities in HFTD areas, please answer the following questions. Please provide separate answers for each type of “other” inspection.

- a) Describe the inspection process from start to finish.
- b) What is the expected inspection cycle for distribution facilities in HFTD areas?
- c) Please list the five most common types of high-priority findings identified in these inspections.
- d) How many personnel are involved in each inspection?
- e) In 2020, how many person-hours were typically required to complete an inspection of one distribution pole and the equipment on it?
- f) In 2020, how many person-hours were typically required to inspect one circuit-mile?
- g) How many qualified personnel do you currently have to perform these inspections?
- h) Of the personnel identified in part (g), how many are direct employees and how many are contractors?

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:

- a. The inspector will visually check for the proper signage and the condition of the pole starting at the base, then to the top. As the inspector is visually checking the pole, the inspector will then visually check the different levels on the pole, such as CIP, secondary, any attached equipment, through the primary level. The inspector will also visually check all wires that is attached to the pole to the next structure. The inspector will also utilize a hammer to sound the base of the pole and attempt to identify any structural

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issues. Also, the inspector will also physically check all guying attached from the ground to the pole and identify any issue with tensions. The inspector will then document their findings onto the electronic inspection order.

If the inspector identifies any issues that require immediate follow up, the inspector will notify their respective dispatcher and proceed with the necessary follow up action.

- b. For the HFTD Tier 2, the inspection cycle is 5 years. For the HFTD Tier 3, the inspection cycle is 5 years, with an overlapping 3-year cycle.
- c. The following are the top five conditions found for this type of inspection
 - 1. R257 Overhead connectors Directly on Line
 - 2. I246 SDGE/Cust Pole or Stub Pole Damaged
 - 3. I241 Damaged Cross-Arm
 - 4. I218 Private Prop Caused Pole Inaccessible
 - 5. I298 Other - Infraction - No Applicable
- d. Typically, 1-2 employee(s).
- e. 0.33 man-hours
- f. Assuming span lengths between poles is 250 feet, that equates to approximately 21 poles. The resulting estimated time would be approximately 416 minutes.
- g. 147 employees
- h. 147 direct employees

**PUBLIC ADVOCATES OFFICE DATA REQUEST: CALPA-SDGE-05
2021 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

**Date Received: March 1, 2021
Date Submitted: March 4, 2021**

QUESTION 11:

For each type of detailed inspection that you perform on distribution facilities in HFTD areas, please answer the following questions:

- a) Describe the inspection process from start to finish.
- b) What is the expected inspection cycle for distribution facilities in HFTD areas?
- c) Please list the five most common types of high-priority findings identified in these inspections.
- d) How many personnel are involved in each inspection?
- e) In 2020, how many person-hours were typically required to complete an inspection of one distribution pole and the equipment on it?
- f) In 2020, how many person-hours were typically required to inspect one circuit-mile?
- g) How many qualified personnel do you currently have to perform these inspections?
- h) Of the personnel identified in part (g), how many are direct employees and how many are contractors?

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:

- a. The inspector will visually check for the proper signage and the condition of the pole starting at the base, then to the top. As the inspector is visually checking the pole, the inspector will then visually check the different levels on the pole, such as CIP, secondary, any attached equipment, through the primary level. The inspector will also visually check all wires that is attached to the pole to the next structure. The inspector will also utilize a hammer to sound the base of the pole and attempt to identify any structural issues. Also, the inspector will also physically check all guying attached from the ground to the pole and identify any issue with tensions. The inspector will then document their findings onto the electronic inspection order.

If the inspector identifies any issues that require immediate follow up, the inspector will notify their respective dispatcher and proceed with the necessary follow up action.

- b. For the detailed GO 165 inspections, the cycle in the HFTD is 5 years.

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- c. The following are the top five conditions found in this inspection type:
 - 1. I246 SDGE/Cust Pole or Stub Pole Damaged
 - 2. I241 Damaged Cross-Arm
 - 3. I298 Other - Infraction - No Applicable
 - 4. I332 Veg in Guy - Heavy Strain or Abrasion
 - 5. I274 Guy Grounded
- d. Typically, 1-2 employees.
- e. 0.43 man-hours
- f. Assuming span lengths between poles is 250 feet, that equates to approximately 21 poles. The resulting estimated time would be approximately 542 minutes.
- g. 147 employees
- h. 147 direct employees

**PUBLIC ADVOCATES OFFICE DATA REQUEST: CALPA-SDGE-05
2021 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

**Date Received: March 1, 2021
Date Submitted: March 4, 2021**

QUESTION 12:

In Table 1, SDG&E reports no Level 3 findings for any type of inspection in HFTD areas. Explain why.

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:

SDG&E only utilizes Level 1 and Level 2 findings in its Corrective Maintenance Program for electric distribution.

**PUBLIC ADVOCATES OFFICE DATA REQUEST: CALPA-SDGE-05
2021 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

**Date Received: March 1, 2021
Date Submitted: March 4, 2021**

QUESTION 13:

This table shows rates of high-priority findings per mile of detailed inspections in HFTD areas. Explain why SDG&E reports a significant decrease in high-priority findings per mile on detailed inspections in 2020, compared to prior years.

Level 1 & 2 findings per mile of detailed inspections						
	2015	2016	2017	2018	2019	2020
SDG&E	0.11	0.11	0.07	0.08	0.07	0.02

RESPONSE 13:

This question was withdrawn by CalPA on March 2, 2021 on the basis that the data provided in this question resulted from a formula error in Excel.