

**PUBLIC ADVOCATES OFFICE DATA REQUEST: CAL ADVOCATES-SDGE-06
2021 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

**Date Received: March 8, 2021
Date Submitted: March 10, 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:

Under the program "centralized repository for data," SDG&E's 2021 WMP table 12 includes actual opex spending of \$5.27 million for 2020, and forecast opex of \$19 million for 2021, and \$12.9 million for 2022.

Please provide the following information regarding this program:

- a) What is the overall scope of the program?
- b) Is SDG&E building out the program using internal staff and server resources?
- c) Did SDG&E incur opex related to this initiative in 2020?
- d) Does SDG&E expect to incur opex for this initiative in the years 2021 and 2022?
- e) If the answer to parts c) and d) is yes, where are those costs located within the 2021 WMP filing?
- f) Does SDG&E expect to incur continuing capex on this program after 2022? If so, please provide forecast spending for the years 2023-2026.

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:

SDGE reads the above question as "...actual ~~opex~~ capex spending..." and "...forecast ~~opex~~ capex of..."

- a) The overall scope of program is to create a centralized repository for all wildfire related data including electric assets, risk events, weather, vegetation, and metrics in accordance with the CPUC and WSD Data Schema requirements. This program is one of multiple that are running in parallel for the central data repository effort.
- b) SDG&E is using internal resources and vendor services.
- c) Yes, SDG&E did incur capex spending related to this initiative in 2020
- d) Yes, SDG&E expects to incur capex spending for this initiative in the years 2021 and 2022.

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- e) For SDG&E's WMP 2021 Filing, Table 12 under Initiative activity states "Wildfire mitigation personnel" with \$555 thousand for 2021 and \$1.77 million for 2022 allocated for Data Governance
 - f) SDG&E plans to continue these activities after 2022 and anticipates spending \$4.6M in 2023, and \$4.6M in 2024. Forecasting for 2025-2026 has not yet been performed.

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QUESTION 2:

Under the program “documentation and disclosure of wildfire-related data and algorithms,” table 12 includes actual opex spending of \$2.2 million for 2020, and forecast opex of \$3.7 million for 2021, and \$3.7 million for 2022.

Please provide the following information regarding this program:

- a) What is the overall scope of the program?
- b) Is SDG&E building out the program using internal staff and server resources?
- c) Did SDG&E incur opex related to this initiative in 2020?
- d) Does SDG&E expect to incur opex for this initiative in the years 2021 and 2022?
- e) If the answer to parts c) and d) is yes, where are those costs located within the 2021 WMP filing?
- f) Does SDG&E expect to incur continuing capex on this program after 2022? If so, please provide forecast spending for the years 2023-2026.

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:

SDGE reads the above question as "...actual ~~opex~~ capex spending..." and "...forecast ~~opex~~ capex of..."

- a) The overall scope of program is to create a centralized repository for all wildfire related data with focus on automated calculation of WMP Performance Metrics (Resolution WSD-011 Attachment 2.3). This program is one of multiple that are running in parallel for the central data repository effort.
- b) SDG&E is using internal resources and vendor services.
- c) No, Did SDG&E did not incur capex spending related to this initiative in 2020
- d) Yes, SDG&E expects to incur capex spending for this initiative in the years 2021 and 2022
- e) In SDG&E’s WMP 2021 Filing, Table 12 under Initiative activity states “Wildfire mitigation personnel” with \$555 thousand for 2021 and \$1.77 million for 2022 allocated for Data Governance

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- f) No, at this time SDG&E does not anticipate capex spending to continue after 2022 for this program, unless there are requirement changes introduced to the WMP Performance Metrics (Resolution WSD-011 Attachment 2.3)

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QUESTION 3:

The following table, taken from SDG&E's table 1 data, shows the total miles of detailed inspections completed in HFTD areas.

Miles of detailed inspections						
	2015	2016	2017	2018	2019	2020
SDG&E	756	880	692	510	680	760

- a) How does SDG&E determine how many miles of detailed inspections to perform each year on distribution facilities in HFTD areas? Please include specific factors considered.
- b) What factors contributed to SDG&E performing significantly fewer miles of detailed inspections in 2018 than in the other years between 2015 and 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) All of SDG&E's poles have a 5-cycle date (month and year) in our inspection and maintenance database. SDG&E endeavors to schedule inspections of these poles in an efficient manner, and tend to group them close by proximity, regardless of the HFTD boundaries.
- b) The fewer miles of detailed inspections in 2018 is the by-product of how SDG&E grouped and scheduled the inspections of poles.

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QUESTION 4:

In table 11 at line 1.c, SDG&E provides the “Duration of PSPS events (total),” and states that this is calculated through “Customer hours per year.” SDG&E reports that customers experienced a total of 197 hours in 2020, and forecast a total of 183 hours in 2021.

- a) How did SDG&E calculate these figures? Are the figures provided on an average per customer basis? Does this include customers outside of the HFTD?
- b) Please provide the total number of customer-hours of PSPS events per year for each column of table 1, calculated on a total basis and consistent with SDG&E’s calculations for “Customer hours of planned outages including PSPS (total)” and “Customer hours of unplanned outages, not including PSPS (total).”

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) Originally filed in Table 11, metric 1.c. represented the total duration (in hours) of all PSPS events, not customer hours. On February 23, 2021, in response to WSD - SDGE DR1, SDG&E submitted revisions to Table 11. These revisions included a correction of metric 1.c to represent the total outage customer hours for all customers. These values include all PSPS outages regardless of HFTD boundaries. Subsequent to the 2/23/21 Table 11 revisions, SDG&E submitted a comprehensive Table 11 with additional changes to other tables on March 4, 2021. That document should be referenced moving forward.
- b) Please refer to “Attachment B – WMP Tables 1-12_Revised 03-04-2021” for the requested metrics, “Customer hours of planned outages including PSPS (total)” and “Customer hours of unplanned outages, not including PSPS (total).”

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QUESTION 5:

Regarding SDG&E's standby power program, described on pages 210-212 of SDG&E's 2021 WMP:

- a) Did SDG&E incur any operating expenses related to the Standby Power Program in 2020?
- b) Does SDG&E expect to incur any operating expenses related to the Standby Power Program in future years? If so, please provide your forecasts for 2021 and 2022.

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. Yes, Standby Power Program incurred \$1.754M in operating expenses for 2020.
- b. Yes, SDGE forecasts to incur \$10.35M for 2021 and an additional \$10.35M for 2022 for the Standby Power Program.

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QUESTION 6:

Regarding table 1 of the non-spatial data submission for SDG&E’s 2021 WMP filing:

SDG&E reports level 1 findings for “other” inspections in the HFTD area only that are greater than the service territory total for both Distribution and Transmission assets in all quarters of 2020. In other words, figure *1.f* is larger than *1.f.ii* across 2020, and figure *1.f.iii* is larger than *1.f.iv* across 2020.

- a) Please confirm the accuracy of these figures. If the figures are accurate, please explain how (i.e., how there are more “other” inspections in the HFTD territory than in SDG&E’s total service territory).
- b) If the figures are incorrect, please provide the accurate figures for lines *1.f*, *1.f.ii*, *1.f.iii*, and *1.f.iv* of WMP Table 1.

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:

6a – Transmission – The figures provided in the table are accurate for the transmission statistics. All finding counts provided in table 1 row 1.f.iii (HFTD) are less than or equal to the finding counts provided in table 1 row 1.f.iv (Total). See table below summarizing the findings provided in Table 1 for 2020.

	Q1 2020	Q2 2020	Q3 2020	Q4 2020
Row 1.f.iii (HFTD)	0.0	0.0	0.0	1.0
Row 1.f.iv (Total)	0.0	0.0	1.0	1.0

6b – Transmission – N/A

6a & b – Distribution – The table should be updated with the numbers below.

#	Progress metric name	2015	2016	2017	2018	2019	2020
1.f.ii.	Level 1 findings for other inspections (list types of "other" inspections in comments) - Distribution lines	50.0	2.0	19.0	60.0	2.0	5.0

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QUESTION 7:

Regarding table 1 of the non-spatial data submission for SDG&E’s 2021 WMP filing:

SDG&E reports level 2 findings for “other” inspections in the HFTD area only greater than in the total service territory for both Distribution and Transmission assets in all quarters of 2020. In other words, figure 1.i is larger than 1.i.ii across 2020, and figure 1.i.iii is larger than 1.i.iv across 2020.

- a) Please confirm the accuracy of these figures. If the figures are accurate, please explain how (i.e., how there are more “other” inspections in the HFTD territory than in SDG&E’s total service territory).
- b) If this is incorrect, please provide the accurate figures for 1.i, 1.i.ii, 1.i.iii, and 1.i.iv.

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:

7a – Transmission – The figures provided in the table are accurate for the transmission statistics. All finding counts provided in table 1 row 1.i.iii (HFTD) are less than or equal to the finding counts provided in table 1 row 1.i.iv (Total). See table below summarizing the findings provided in Table 1 for 2020.

	Q1 2020	Q2 2020	Q3 2020	Q4 2020
Row 1.i.iii (HFTD)	0.0	0.0	10.0	4.0
Row 1.i.iv (Total)	0.0	2.0	13.0	8.0

7b – Transmission – N/A

7a & b – The table should be updated with the numbers below.

#	Progress metric name	2015	2016	2017	2018	2019	2020
1.i.ii.	Level 2 findings for other inspections (list types of "other" inspections in comments) - Distribution lines	438.0	612.0	449.0	313.0	409.0	451.0

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QUESTION 8:

Question 8

Regarding table 1 of the non-spatial data submission for SDG&E's 2021 WMP filing:

Figure 1.1.iii on row 43 of SDG&E's table 1 is currently titled "Level 3 findings in HFTD for other inspections (list types of "other" inspections in comments) - Distribution lines". However, this figure is included under the "Grid condition findings from inspection - Transmission lines in HFTD" section of the data.

- a) Please confirm that the data in row 43 is correct. If it is not, please provide a corrected table.
- b) Please explain what types of inspections fall under "Level 3 findings in HFTD for other inspections" in row 43 of Table 1.

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 data provided in row 43 is correct. Row label should read "Level 3 findings in HFTD for other inspections (list types of "other" inspections in comments) - Transmission lines"
- b) Inspection types that fall under other inspections in row 43 include infrared and special inspections and patrols. Infrared inspections are discussed in section 7.3.4.5. There are a variety of special inspections/patrols that occur on a non-routine, but planned or prearranged basis. Special inspections/patrols of particular tielines and/or structures are sometimes required when preparing for planned outages associated with construction and/or maintenance projects. Special inspections/patrols may also be conducted before a line is initially energized after construction or re-energized after an extended outage. Special security patrols on critical tielines are conducted during or after major holidays or events in areas frequented by off road enthusiasts or as needed for security reasons.