

**PUBLIC ADVOCATES OFFICE DATA REQUEST: CALPA-SDGE-08  
2021 WILDFIRE MITIGATION PLAN  
SDG&E RESPONSE**

**Date Received: May 10, 2021  
Date Submitted: May 24, 2021**

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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**

The following questions relate to SDG&E's 2021 WMP.

**QUESTION 1:**

Please provide a list of undergrounding projects completed in 2020 for wildfire risk mitigation purposes. Please include only projects performed in HFTDs. For each such project, include the following:

- a) The project start date.
- b) The project completion date.
- c) The approximate number of months to complete the project planning.
- d) The approximate number of months to complete the design.
- e) The approximate number of months to complete the construction.
- f) An explanation of any additional project time not included in part (c) through (e).
- g) The number of circuit miles undergrounded.
- h) Whether the project was performed in HFTD Tier 3, Tier 2, or Zone 1.
- i) The expected useful life of the project.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 3, and 7. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 1:**

See attached file "CalPA DR8 Q1.4".

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**QUESTION 2:**

Please respond to Question 1 above for the following years, sorting projects by *completion* date:

- a) 2018.
- b) 2019.
- c) 2021 – actual information for projects completed to date.
- d) 2021 – projected information for projects not yet completed but expected to be completed this year.
- e) Projected for 2022.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 3, and 7. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 2:**

See attached file “CalPA DR8 Q1.4”.

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**QUESTION 3:**

Please provide a list of covered conductor projects completed in 2020 for wildfire risk mitigation purposes. Please include only projects performed in HFTDs. For each such project, include the following:

- a) The project start date.
- b) The project completion date.
- c) The approximate number of months to complete the project planning.
- d) The approximate number of months to complete the design.
- e) The approximate number of months to complete the construction.
- f) An explanation of any additional project time not included in part (c) through (e).
- g) The number of circuit miles of covered conductor installed.
- h) Whether the project was performed in HFTD Tier 3, Tier 2, or Zone 1.
- i) The expected useful life of the project.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 3, and 7. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 3:**

See attached file "CalPA DR8 Q1.4".

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**QUESTION 4:**

Please respond to Question 3 above for the following years, sorting projects by *completion* date:

- a) 2018.
- b) 2019.
- c) 2021 – actual information for projects completed to date.
- d) 2021 – projected information for projects not yet completed but expected to be completed this year.
- e) Projected for 2022.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 3, and 7. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 4:**

See attached file “CalPA DR8 Q1.4”.

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**QUESTION 5:**

In SDG&E’s November 26 – December 9, 2020 PSPS post-event report, and in SDG&E’s December 23-24, 2020 PSPS post-event report, SDG&E states that some customers were not provided with required notifications and that the “missed notifications may be attributed to non-communicative SCADA switches.”

In response to a March 1, 2021 Public Advocates Office data request, SDG&E stated that “devices 450-88R, 728-690, and 920-735AE were not operated remotely, leading to customers being de-energized without notification.”<sup>1</sup>

- a) SDG&E’s post-event reports state that missed notification “may” be attributable to non-communicative SCADA switches. Is SDG&E unsure whether these non-notified de-energizations were attributable to non-communicative SCADA switches? Has SDG&E’s understanding of the cause of these missed notifications changed since the post event reports were filed? Please explain.
- b) SDG&E’s data request response indicates that three switches “were not operated remotely.” Has SDG&E determined the cause of the failure of these switches to operate? Please explain.
- c) In the past 5 years, has SDG&E experienced other instances of a SCADA switch failing to operate? If so, please provide the date of each failure, the cause of the failure, and the number of customers impacted.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 3, 7, and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 5:**

- a) In the November 26-December 9, 2020 PSPS post-event report, SDG&E used the term “may” because SDG&E had not concluded a complete investigation and repair of the devices listed at the time that the post-event report was issued. Although communication infrastructure issues are a common cause that could prevent SCADA device operation, they are not the only cause. Other potential causes may be attributed to issues with the local switch controller, equipment issues with the switch itself, or issues with the SCADA system managing the control process. See part (b) for an explanation of the devices that did not operate remotely.  
SDG&E is confident in the information provided in the previous post-event reports. SDG&E’s understanding of the cause of these missed notifications has not changed.

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<sup>1</sup> Data Request CALPA-SDGE-04, 2021 WMP, Q 11. March 4, 2021.

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- b) Since submitting its November 26-December 9, 2020 PSPS post-event report, SDG&E has determined the cause of the failure of the three referenced switches to operate:
- i. 450-88R: Open command showed failure, however field personnel confirmed the switch was opened when they arrived on scene. As a result of the failed command, upstream device 450-88R was also opened. Further information confirmed that communication to the device was 25% at the time control was sent. Since then, average communications have been between 98-100%.
  - ii. 728-690: As communications on 728-688AE were at a reduced level, the site was running on DC backup power. The battery voltage was below the level required to operate the RTU and the device could not be operated. As a result, upstream device 728-690 was used to de-energize load.
  - iii. 920-735AE: SDG&E intended to operate manual switch 920-812, but it was deemed unsafe due to high winds and brush in the area. As a result, the upstream SCADA device 920-735AE was opened.
- c. In the past 5 years, SDG&E has experienced other instances of a SCADA switch failing to operate. However, this information is not readily available without doing exhaustive sorting through multiple systems of record. For these reasons, the information sought over such an extensive period of time is overly broad and unduly burdensome. SDG&E provided corrective maintenance orders from 2020 in the de-energization OIR data request, CalPA DR19. However, the corrective maintenance orders do not always correspond to a failure to operate a SCADA switch.