

**MUSSEY GRADE ROAD ALLIANCE DATA REQUEST: MGRA-SDGE-01
2021 WILDFIRE MITIGATION PLAN UPDATE
SDG&E RESPONSE**

**Date Received: January 7, 2021
Date Submitted: January 12, 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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Utilities are required to provide data upon request to stakeholders under WSD-001. At the request of the Wildfire Safety Division, utilities have begun to provide GIS data to WSD in geodatabase format via a secure Commission website, with updates provided as part of quarterly reports. As per WSD-011, utility data is provided in quarterly reports so that analysis can be “frontloaded” prior to the issuance of the Wildfire Mitigation Plans.¹ IOUs provided GIS data to WSD in September and December 2020.

This data request is being issued to SCE, PG&E, and SDG&E. Response time specified in WSD-01 is three business days, with exceptions requiring notification of the Wildfire Safety Division director.

III. RESPONSES

QUESTION 1:

Please provide the most recent available geodatabase comprised of the non-confidential portion of the GIS data uploaded to the WSD website. This should contain the least the version of GIS data provided to WSD in September pursuant to the Draft WSD GIS Data Reporting Requirements and Schema for California Electric Corporations (Draft GIS Data Schema) along with any updates provided in December. Where confidential data is intermixed in tables with non-confidential data, fields containing confidential data should be left blank or removed. Confidentiality should not be applied at the feature class level.

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:

SDG&E is required to submit spatial data related to its Wildfire Mitigation Plan (WMP) consistent with the Wildfire Safety Division’s *Geographic Information System (GIS) Data Reporting Requirements and Schema for California Electrical Corporations* issued on August 5, 2020 (WSD schema). Due to the design limitations of the WSD’s current schema, there is no process to separate confidential and non-confidential data within attributes of certain feature classes. Additional attributes stored within SDG&E’s GIS data which allow for identification of confidential information (i.e., voltages of 230kV and above) are not tracked in all feature classes where transmission equipment information is tracked within the WSD schema. In these cases, once the data is loaded into the WSD schema, SDG&E can no longer distinguish between

¹ WSD-011; Attachment 2.1; p. 1 – “Accordingly, the WSD will consider these four key elements for the 2021 WMP Update submission and review process: 1. Frontload data collection. This would extend the timeframe for WSD and stakeholder review of relevant utility data in advance of the WMP submission and review period, in addition to reducing the need for follow-up data requests. This means some data is collected prior to the annual WMP through Quarterly Reports...”

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confidential and non-confidential data. The WSD has requested that utilities track confidentiality in a separate excel status report, which does not connect back to the geodatabase submission and therefore does not allow for filtering of confidential data within the geodatabase submission. To respond to this data request and as discussed with MGRA on January 11, 2021, SDG&E has removed all feature classes that contain confidential data, which is not able to be separated from non-confidential data.

SDG&E plans to work with the WSD on a solution to this constraint. SDG&E recommends that a confidentiality attribute be added to each feature class to allow for future filtering of confidential data from non-confidential data. This will allow the utilities to filter out confidential data without affecting non-confidential data.

Please see the attached document: MusseyGradeGIS.gdb, which is being sent via SDG&E's electronic data transfer system.

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QUESTION 2:

If updates to the GIS database are to be released to WSD contemporaneously with the Wildfire Mitigation Plans, the IOUs shall make non-confidential versions of the GIS data available to MGRA and other interested stakeholders at the same time that they are released to WSD. Deadline for this request is therefore the same as that for GIS data release to WSD.

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:

Please see the response to Question 1 above. SDG&E will work with MGRA and other parties to provide non-confidential versions of its geodatabase files.