

**THE UTILITY REFORM NETWORK (TURN) DATA REQUEST:
TURN-SDGE-03 SUPPLEMENTAL
2021 WILDFIRE MITIGATION PLAN UPDATE
SDG&E RESPONSE**

**Date Received: March 24, 2021
Date Submitted: March 25, 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

QUESTION 1:

TURN requests a response to DR 003-01(b). The questions asked:

"Will SDG&E conduct all of the activities included in the bare wire hardening program on circuit miles where it will install covered conductor? "

SDG&E Responded:

"No, covered conductor has a lower fire risk than bare conductor. SDG&E sees no future need to replace covered conductor with bare conductor."

TURN apologizes if the question was unclear; however, in the context of the subsequent questions concerning FiRM, PRiME and pole replacement, TURN assumed SDG&E would interpret "all of the activities" to include the aspects of bare wire hardening *aside from* conductor replacement, including replacing all wood poles with steel or fiberglass poles. TURN is pleased that SDG&E does not intend to install covered conductor and then turn around and replace it with bare wire.

We would appreciate if SDG&E would provide a supplemental response as soon as possible, explaining the extent to which the new covered conductor program will include activities (asset replacements aside from conductor) previously conducted under the bare wire hardening program.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 3, and 6. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 1:

The costs included in the Covered Conductor program include all activities required to install the covered conductor, which may include the replacement of structures. For instance, in cases where an existing steel or fiberglass pole is adequate to support the new covered conductor (including clearances and pole loading) the pole will not be replaced. These structures and associated conductor being replaced as part of the Covered Conductor program do not overlap with structures/conductor being hardened as part of the Distribution Overhead System Hardening program during the WMP period.