

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

**Date Received: March 18, 2021
Date Submitted: March 23, 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:

Regarding covered conductor – initiative 7.3.3.3

- a. Will any of the miles forecast for CC installation in 2020-2022 overlap with circuit miles hardened pursuant to the bare wire Distribution Overhead Hardening Program (initiative 7.3.3.17.1)?
 - i. If yes, please identify how many miles by year.
 - ii. If yes, please explain why SDG&E intends to install CC on hardened circuits.

- b. Will SDG&E conduct all of the activities included in the bare wire hardening program on circuit miles where it will install covered conductor?
 - i. If yes, where are those costs included in Table 12 (in which initiative)?
 - ii. If no, why not?

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 6, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 1:

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

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QUESTION 2:

Regarding the bare wire Distribution Overhead Hardening Program (initiative 7.3.3.17.1) - For each year 2019 and 2020, please provide the actual:

- a. Circuit miles in HFTD addressed by this program and its components (FiRM, PRiME, WiSE).
- b. Number of poles i) removed and ii) installed as part of the program.
- c. Miles of conductor replaced as part of the program.
- d. Number of other assets replaced, by asset type (e.g. transformer, switch, fuse, etc.).

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 6 and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 2:

- a) The total circuit miles in the HFTD addressed by each program and its components include:
FiRM: 2019 = 82 miles
2020 = 81 miles
PRiME: 2019 = 35 miles
2020 = 21 miles
WiSE: 2019 = 0 miles
2020 = 0.35 miles
- b) The following number of poles were removed by the program:
2019: 2,000 poles removed
2020: 1,737 poles removed
The following number of poles were installed by the program:
2019: 2,025 poles installed
2020: 1,667 poles installed
- c) The following circuit miles were hardened by the program:
2019: 122.9 miles
2020: 106 miles
- d) The Distribution OH Hardening Program tracks data at the structure level. The minor units such as transformers, switches, fuses, etc. are not readily available.

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QUESTION 3:

Regarding the bare wire Distribution Overhead Hardening Program (initiative 7.3.3.17.1) – Are the “line miles to be treated” shown in Table 12 all located in HFTD? If not, please disaggregate by HFTD and non-HFTD.

OBJECTION:

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

RESPONSE 3:

Not all of the miles in Table 12 are located in the HFTD. For 2020 approximately 3 miles were treated outside of the HFTD, out of the approximately 100 miles overall. For 2021 SDG&E anticipates approximately 3 miles of line to be treated outside of the HFTD, with approximately 97 miles within the HFTD. For 2022, SDG&E anticipates all line miles of treatment to be within the HFTD.

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QUESTION 4:

Regarding the planned consolidated Distribution Overhead System Hardening Program:

- a. Will SDG&E always replace wood poles with steel poles when conducting pole replacements?
- b. If yes, why? If no, please explain the criteria used to determine whether to install steel poles.
- c. Has SDG&E conducted pole loading studies or any other studies or analyses that show that wood poles would be insufficient in all locations to preclude ignition risk? Please explain.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 3, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 4:

- a) It has generally been SDG&E's practice to replace wood poles with either steel or fiberglass poles. The overwhelming majority of poles replaced in the HFTD have been steel.
- b) Steel and fiberglass poles are built with materials that are heat resistant. Should a pole be exposed to a wildfire, a steel or fiberglass pole will be more likely to withstand the heat, thus increasing SDG&E's ability to bring the services back on in the area with reduced impact. Wood poles have an increased likelihood of being damaged or destroyed during a wildfire. Additionally, steel and fiberglass poles are built in a factory that ensure consistent material properties. The material properties of wood can vary since it is grown and not manufactured. By installing steel or fiberglass poles, SDG&E has more confidence that the pole will be able to withstand the designed environmental events. In addition, pole replacements are often necessary due to different sag and clearance requirements of the new wire being strung. SDG&E often installs new poles that are 5-10ft taller than the existing pole.
- c) SDG&E does not perform pole loading studies on wood poles that will be replaced for fire hardening projects. Please see question 4(b) for an explanation of why wood poles are replaced with steel or fiberglass.