

ABRAMS DATA REQUEST: ABRAMS-SDG&E-01
R.18-10-007 – SB901 WILDFIRE MITIGATION PLAN OIR
SDG&E RESPONSE

Date Received: March 5, 2019
Date Submitted: March 8, 2019

QUESTION 1:

Please, provide the any and all risk assessments, reports, studies and correspondence to your investors, insurers and board of directors related to any and all wildfire mitigation efforts since January, 2015. Of particular importance would be all assessments and correspondence related to effects on utility company insurance premiums.

RESPONSE 1:

SDG&E objects to this request on the grounds that it is overbroad and unduly burdensome and may encompass matters that are protected from disclosure by the attorney client privilege or the attorney work product doctrine. Notwithstanding and without waiving these or any other objections, SDG&E responds as follows:

Each year, SDG&E performs a risk assessment of the risks contained within its Enterprise Risk Registry (ERR). SDG&E subsequently uses that assessment to rank its key risks. The Wildfire risk is the top ranked risk in the ERR. The fact that the Wildfire risk is the number one risk at SDG&E is shared with outside entities, including investors and insurers. SDG&E also communicates that it is taking appropriate measures that reflect the seriousness of the risk, as demonstrated by its recent Wildfire Mitigation Plan.

Attached is a presentation that has been given to insurance companies. See the attached: “Abrams-SDG&E-01 Q1 Attachment.pdf.” The information is similar in nature to the information contained within the Wildfire Mitigation Plan.

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QUESTION 2:

Please, provide risk assessments and risk mitigation plans created, produced or reporting in the years 2015 to 2019 that weigh the relative risks of particular zones, geographies, towns, cities, counties and other standard mappable areas as defined by utility company and it's insurers. Provide rank and provide relative risk ratio for each of these geographic categories.

RESPONSE 2:

SDG&E objects to this request on the grounds that it is vague and ambiguous, overbroad, and unduly burdensome and may encompass matters that are protected from disclosure by the attorney client privilege or the attorney work product doctrine and may encompass matters that are protected from disclosure by the attorney client privilege or the attorney work product doctrine. Notwithstanding and without waiving these or any other objections, SDG&E responds as follows:

Since the creation of the High Risk Fire Area (HRFA) in 2008, and the Fire Threat Zone (FTZ) in 2010, SDG&E has used geographic areas to implement and prioritize certain activities. The HRFA was a subset of higher risk within the FTZ. In 2018, the CPUC approved the High Fire Threat District (HFTD) and SDG&E adopted it as the replacement of the previous maps. The CPUC's HFTD map is available here: <https://ia.cpuc.ca.gov/firemap/>.

HFTD Tier 3 is similar in area as the HRFA, and HFTD Tier 2 is similar to the portion of the FTZ outside of the HRFA. Additionally, the HFTD maps also include a tree mortality area known as HFTD Zone 1. In SDG&E's service territory, all of HFTD Zone 1 is contained in either HFTD Tier 2 or HFTD Tier 3.

In addition to geographic areas mentioned above, SDG&E utilizes its Wildfire Risk Reduction Model (WRRM) to assess wildfire risk at each pole in SDG&E service territory. The WRRM allows for a higher resolution of risk assessment than the HFTD. The higher resolution allows SDG&E to prioritize system hardening projects such as the Fire Risk Mitigation (FiRM) program.

In general, certain activities are prioritized by the HFTD tier level, other activities are prioritized by WRRM output, and several operational activities are prioritized by situational conditions such as high wind.

SDG&E does not have risk ratios between Tiers of the HFTD. The ranking of risk in descending order is: HFTD Tier 3, HFTD Tier 2, non-HFTD.

SDG&E is not aware of additional "standard mappable areas," which might be defined by insurers.

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QUESTION 3:

Please, provide a list of the top 100 most at-risk components or parts related to electric generation and provide ranking and relative risk ratio for each of the following categories (based on most recent data available):

- a. likely/relative contribution to wildfire ignitions
- b. likelihood of being a wildfire ignition source
- c. likely/relative contribution to the propagation/spread of wildfires.

RESPONSE 3:

SDG&E does not have such documents and has not identified a “top 100” component listing.

However, a brief discussion of ignition data might illuminate the subject further. Each year, SDG&E collects and reports ignitions that meet certain criteria. The report is submitted to the CPUC as part of the requirements of the Fire Safety rulemaking proceeding (Decision (D.) 14-02-015). The CPUC website, which holds the data can be found at <http://cpuc.ca.gov/fireincidentsdata/> and is referred to the Fire Incident Data Collection.

There are no recorded instances in SDG&E’s portion of the Fire Incident Data Collection where electric generation was the source of an ignition.

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QUESTION 4:

Please, provide a list of the top 100 most at-risk components or parts related to electric distribution and provide ranking and relative risk ratio for each of the following categories (based on most recent data available):

- a. likely/relative contribution to wildfire ignitions
- b. likelihood of being a wildfire ignition source
- c. likely/relative contribution to the propagation/spread of wildfires.

RESPONSE 4:

SDG&E does not have such documents and has not identified a “top 100” component listing.

However, as stated in the response to Question 3 above, a brief discussion of ignition data might illuminate the subject further. Each year, SDG&E collects and reports ignitions that meet certain criteria. The report is submitted to the CPUC as part of the requirements of the Fire Safety rulemaking proceeding (D.14-02-015). The CPUC website which holds the data can be found at <http://cpuc.ca.gov/fireincidentsdata/> and is referred to the Fire Incident Data Collection.

The electric distribution system has been associated to 125 entries in SDG&E’s portion of the Fire Incident Data Collection between 2014 and 2018. These ignitions were caused by a variety of sources including vehicle contact, human activity, mylar balloon, animal and vegetation contact, and equipment failure. Of the ignitions that were categorized as being caused by equipment, the types of equipment involved were (in order of descending frequency):

Conductor: 8
Connectors/Splices: 8
Transformer: 4
Lightning Arrestor: 3
Capacitor Bank: 1
Fuse: 1
Guy Wire: 1
Switch: 1

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QUESTION 5:

Please, provide a list of the top 100 most at-risk components or parts related to electric transmission and provide ranking and relative risk ratio for each of the following categories (based on most recent data available):

- a. likely/relative contribution to wildfire ignitions
- b. likelihood of being a wildfire ignition source
- c. likely/relative contribution to the propagation/spread of wildfires.

RESPONSE 5:

SDG&E does not have such documents and has not identified a “top 100” component listing.

However, as discussed in the response to Questions 3 and 4 above, a brief discussion of ignition data might illuminate the subject further. Each year, SDG&E collects and reports ignitions that meet certain criteria. The report is submitted to the CPUC as part of the requirements of the Fire Safety rulemaking proceeding (D.14-02-015). The CPUC website which holds the data can be found at <http://cpuc.ca.gov/fireincidentsdata/> and is referred to the Fire Incident Data Collection.

The electric transmission system has been associated to 16 entries in SDG&E’s portion of the Fire Incident Data Collection between 2014 and 2018. These ignitions were caused by a variety of sources including vehicle contact, human activity, mylar balloon, animal contact, and one instance of equipment failure. In 2015, a connector on the Electric Transmission system failed and led to a fire which was categorized as being less than 0.25 acres in size.

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QUESTION 6:

Please, provide the scheduled inspection date and actual inspection date from January, 2015 through December, 2018 for each part or component listed in 4, 5 and 6 above. Additionally, provide average rate of inspections for each part/component relative to original due date of inspection and manufacturer end-of-life date.

RESPONSE 6:

SDG&E objects to this request on the grounds that it is vague and ambiguous, overbroad, and unduly burdensome. Notwithstanding and without waiving these or any other objections, SDG&E responds as follows:

Please see the responses to Questions 3 through 5 above. SDG&E's inspection cycles are discussed in Section 4.2 of SDG&E's WMP.

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QUESTION 7:

Please, provide actual and forecasted failure rates for each part or component listed in questions 4, 5 and 6 above. Provide the most recently acquired failure rates of each along with date those failure rates were calculated.

RESPONSE 7:

SDG&E objects to this request on the grounds that it is vague and ambiguous, overbroad, and unduly burdensome. Notwithstanding and without waiving these or any other objections, SDG&E responds as follows:

Please see the responses to Questions 3 through 5 above.

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QUESTION 8:

Please, provide any and all weather-based or wildfire-based risk assessments, reports or studies specific to any parts or components answered in questions 4, 5 or 6 above that could significantly or substantially contribute to additional risk of failure, wildfire ignition or wildfire propagation (conducted or completed at any time within the January, 2008 to December, 2018 time-period).

RESPONSE 8:

SDG&E objects to this request on the grounds that it calls for speculation, is vague and ambiguous, overbroad, and unduly burdensome and may encompass matters that are protected from disclosure by the attorney client privilege or the attorney work product doctrine. Notwithstanding and without waiving these or any other objections, SDG&E responds as follows:

Please see the responses to Questions 3 through 5 above.

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QUESTION 9:

Please, provide all reports, studies, assessments and internal correspondence related to reportable ignition data including the modeling of different combinations and permutations of programs produced or completed from January 2015 to today. Similarly, provide all correspondence related to these topics with investors, contractors, vendors, insurers and board members during this same time period.

RESPONSE 9:

SDG&E objects to this request on the grounds that it is vague and ambiguous, overbroad, and unduly burdensome and may encompass matters that are protected from disclosure by the attorney client privilege or the attorney work product doctrine. Notwithstanding and without waiving these or any other objections, SDG&E responds as follows:

Please refer to the attached: “Abrams-SDG&E-01 Q9 Attachment.pdf” which contains information regarding SDG&E’s CPUC Reportable Fires from 2015-2018.

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QUESTION 10:

Please, provide all reports, studies and correspondence related to circuit prioritization based on asset wildfire risk from January 2015 to today. Similarly, provide all correspondence related to these topics with investors, contractors, vendors, insurers and board members during this same time period.

RESPONSE 10:

SDG&E objects to this request on the grounds that it is vague and ambiguous, overbroad, and unduly burdensome and may encompass matters that are protected from disclosure by the attorney client privilege or the attorney work product doctrine. Notwithstanding and without waiving these or any other objections, SDG&E responds as follows:

As part of the normal course of designing and maintaining its overhead electric system, SDG&E's engineers and designers endeavor to regularly analyze circuits to determine and offer hardening and rebuilding projects in order to reduce fire risk and increase reliability. These risk reduction projects vary widely in cost, complexity, duration, and distance. Each project is reviewed by a team of individuals and scheduled to be completed based on available capital as well as perceived risk that is based on a variety of factors and the associated ranking. However, through all this evaluation and risk perception SDG&E's engineers are unable to associate a specific percentage of fire related risk reduction gained by completing these projects. As such, SDG&E developed a risk reduction computer-based modeling program, the Wildfire Risk Reduction Model (WRRM) that allows its engineers to evaluate and rank each project to determine the amount of fire risk reduction it would obtain as a result of completing any particular project. This software model deliverable integrates leading edge fire science modeling to derive known and perceived risk measures that will provide a rank of proposed electric overhead distribution hardening and re-build projects. The modeling outputs provides a relative ranking of projects and quantify the amount of risk reduction expected for each project.

A range of different risk factors, inputs and values will be incorporated into the model including:

- vegetation and fuels data,
- weather and predictive services data,
- historical fire occurrence and outage history,
- fire behavior analysis and simulation models, distribution network assets, conditions and characteristics,
- subjective values-at-risk parameters, and
- risk reduction projects.

These parameters allow SDG&E engineers to refine the model to match priorities at any time, as well as historical or current weather conditions.

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SDG&E's FiRM program utilized the results of this risk model to prioritize fire hardening efforts.

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QUESTION 11:

Please, provide all reports and available correspondence related to egress risk scores from January 1, 2000 to today.

RESPONSE 11:

SDG&E is not in possession of documents regarding egress risk scores.

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QUESTION 12:

Please, describe the collaboration currently underway with County and local government agencies around evacuations and risk mitigation. Please, provide agendas, meeting minutes and and/all other documentation from those types of meetings from January 2015 to today. Provide dates and topics of future meetings with these same agencies.

RESPONSE 12:

Regarding the subject of risk mitigation, SDG&E maximizes engagement by utilizing collaboration channels already in existence for stakeholder agency and regional expert interaction with County and local government agencies. SDG&E works in close partnership with the County of San Diego's Office of Emergency Services (OES), local government agencies, regional organizations, and civilian/military working groups in assessments that focus on infrastructure systems and address a range of hazards that could have regionally significant consequences.

An example of such a partnership is the San Diego County Unified Disaster Council, comprised of the San Diego County Board of Supervisors, and representatives from the 18 incorporated cities. The collaboration among the various disciplines helps ensure to regional risks are identified, risk mitigation strategies are developed; planning, training and exercise is coordinated, and interdependencies and resources are recognized all in effort to enhance the resilience and protection of facilities, surrounding communities, and the entire San Diego region.

As a participating Stakeholder Agency, SDG&E does not own or have oversight of meeting agendas or meeting minutes. A representative sample of agendas have been provided where available. See attached "Abrams-SDG&E-01 Q12 Attachments.zip." The collaboration channels specifically related to emergency planning and risk mitigation which SDG&E utilizes, along with meeting frequency, are outlined below:

- Civil Military Emergency Planners Meeting. Frequency: Quarterly
- San Diego County Unified Disaster Council. Frequency: Quarterly
- Regional Critical Lifelines Work Group. Frequency: Quarterly
- Regional Emergency Planning Workshops. Frequency: Annually
- San Diego County Resilience Program. Frequency: Annually
- SDG&E Emergency Plans Brief to County and local government agencies. Frequency: Bi-Annually

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Finally, SDG&E’s collaboration with County and local governments is further evidenced in a Staff Report issued by ALJ Kelly on March 5, 2019, on Workshop 2 in Phase 2 of the Physical Security OIR – Utility Disaster and Emergency Preparedness Plans. The Report provides an overview of comments made by Holly Crawford, Director of San Diego County OES, who stated that the county developed a close working relationship with SDG&E and met “face to face” with SDG&E throughout the year to ensure familiarity and dialogue during typical emergency operations. SDG&E offers a liaison to the county emergency operations center (EOC) and engages OES staff when they activate to address an emergency. She complimented SDG&E for promoting an open dialogue regarding anticipated extreme weather events and their emergency plans drafting process. “They keep us informed of planned outages, e.g., high wind events - planning calls with San Diego staff.”

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QUESTION 13:

Please, provide a risk assessment (probability ratio, relative impact of risk) associated with each execution risk related to personnel, labor or staffing. In each case where “personnel” or “staffing” or “workforce” or like resources is an execution risk indicate number of personnel estimated to achieve target and provide any internal correspondence related to these staffing issues.

RESPONSE 13:

SDG&E is not in possession of such an assessment.

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QUESTION 14:

Please, indicate all ongoing collaborative teams associated with external firefighter organizations and provide all correspondence and meeting minutes associated with those discussions from January, 2015 to today.

RESPONSE 14:

SDG&E's Fire Coordination department is in constant communication with the external firefighting organizations within its service territory. These collaborative efforts include formal and informal meetings and communications. Topics of discussion include, but are not limited to, fire prevention and mitigation relating to new/ongoing construction projects, incident response, fuels management, energy storage entering the service territory, local fire codes, and the planning/implementation of training for first responders. With that said, SDG&E does not have a repository for correspondence and much of this communication is informal.

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QUESTION 15:

Please indicate the percentage of “property owner objections” relative to the overall size of effort for vegetation management (e.g. number of objections/number of trees in total program). Similarly, please indicate the number of property owner objections/total for poles/towers in the HFTD areas. Please, also similarly size these “property owner objections” with every other mitigation where this has been listed as a risk or area of jeopardy.

RESPONSE 15:

SDG&E does not track the requested information in the format requested.

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QUESTION 16:

Please, provide all contracts, Service Level Agreements (SLAs) and related correspondence with all contracted vegetation management organizations under contract in the years 2015-2019. Please, provide all correspondences with these contractors. Similarly, please provide all correspondence and reports regarding vegetation management to and from insurers and reinsurers during same time period.

RESPONSE 16:

SDG&E objects to this request insofar as it is overbroad, compound and unduly burdensome and may encompass matters that are protected from disclosure by the attorney client privilege or the attorney work product doctrine. Notwithstanding and without waiving these or any other objections, SDG&E responds as follows:

Please refer to “Abrams-SDG&E-01 Q16 Attachments CONFIDENTIAL.zip,” which contains confidential and protected material.

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QUESTION 17:

Provide all contracts and SLAs associated with weather station and HD camera contractors/vendors under contract in part or all of the years 2015-2019. Provide all correspondence with these same vendors. Please, provide all correspondences with these contractors. Please, provide all correspondences related to this topic with investors, board members, executives, insurers and reinsurers during same time period.

RESPONSE 17:

SDG&E objects to this request insofar as it is overbroad, compound and unduly burdensome and may encompass matters that are protected from disclosure by the attorney client privilege or the attorney work product doctrine. Notwithstanding and without waiving these or any other objections, SDG&E responds as follows:

Please refer to “Abrams-SDG&E-01 Q17 Attachments CONFIDENTIAL.zip,” which contains confidential and protected material.

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QUESTION 18:

Provide all contracts and SLAs associated with Geostationary Operational Environmental Satellite (GOES) contractors/vendors under contract in part or throughout all years 2015-2019. Please, provide all correspondences with these contractors. Please, provide all correspondences related to these topics with insurers and reinsurers during this same time period.

RESPONSE 18:

SDG&E does not have contracts associated with Geostationary Operational Environmental Satellite.

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QUESTION 19:

Provide all drafts, plans and correspondence relative to resilience zones. Please, provide all correspondences related to these topics between Utility executives and contractors, insurers or reinsurers at any time from 2015 – 2019.

RESPONSE 19:

SDG&E has not classified portions of its service territory as “resilience zones” and therefore does not have any correspondence related to these such zones.

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QUESTION 20:

Please, provide any data that indicates the relative effectiveness of PSPS Notification Strategies or communication tactics including but not limited to IVR, texts, emails, mailers, door knockers, and advertisements from January 2015 to today. Please, provide a record of all customer complaints relative to these communications.

RESPONSE 20:

SDG&E objects to this request on the grounds that it is overbroad and unduly burdensome. Notwithstanding and without waiving these or any other objections, SDG&E responds as follows:

2018 was the initial year we implemented PSPS notification and communication tactics. Below are the 2018 results:

- IVR/ENS message distribution (text, phone call, email) – 800,000 records
- High Fire Threat District Newsletter mailers – 18,000 customers
- High Fire Threat District direct communications (email/letter) asking customers to update contact information/sign up for outage notifications – 18,000 customers
- Newspaper ads asking customers to update contact information/sign up for outage notifications ran in back-country newspapers servicing the High Fire Threat District. Estimated total impressions for the ad campaign were about 472,000.

Eleven customer complaints were recorded by the Customer Contact Center in 2018.

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QUESTION 21:

Please, provide records of all internal communications including meeting minutes and transcripts relative to the re-energization strategy after a de-energization event from January, 2015 to today. Also, include communications with all related contractors during the same time period.

RESPONSE 21:

SDG&E objects to this request on the grounds that it is overbroad and unduly burdensome and may encompass matters that are protected from disclosure by the attorney client privilege or the attorney work product doctrine. Notwithstanding and without waiving these or any other objections, SDG&E responds as follows:

SDG&E developed a re-energization strategy in 2010, which has been used in each instance that SDG&E has de-energized power for public safety. Following a de-energization, SDG&E's team of meteorologists will forecast when weather conditions will improve on the affected portion of the electric system. Patrol crews are pro-actively scheduled to anticipate the forecasted reduction in wind speeds and are positioned in the field to minimize delays. Once the weather station assigned to a circuit indicates that wind speeds have subsided along an entire circuit and winds are not forecast to re-strengthen, then patrols of that circuit are initiated by air and ground. Assuming there is no damage found on the circuit, the lines are re-energized in segments with contract firefighting resources in the area. If damage is found, then all repairs are made before any re-energization occurs.

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QUESTION 22:

Please, provide all reports and correspondence with contractors, vendors, insurers, reinsurers and company investors relative to the need or planned execution of the wires down detection projects from January, 2015 to today.

RESPONSE 22:

SDG&E objects to this request on the grounds that it is overbroad and unduly burdensome and may encompass matters that are protected from disclosure by the attorney client privilege or the attorney work product doctrine. Notwithstanding and without waiving these or any other objections, SDG&E responds as follows:

Please see attached “Abrams-SDG&E-01 Q22 Attachment.”