

**PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2023WMP-01
SDG&E RESPONSE**

**Date Received: February 07, 2023
Date Submitted: February 15, 2023**

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

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undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

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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QUESTION 1

Please provide a copy of each WMP-related document, submission, or report you submit to the Office of Energy Infrastructure Safety (Energy Safety) in 2023 that is related to your WMP. Provide the copy to Cal Advocates within one business day of the document's submittal to Energy Safety. (If you have submitted the document to Energy Safety in 2023 prior to this data request, please provide a copy as soon as possible and no later than 10 business days from the issuance of this data request.)

This request is limited to materials or documents that (1) are related to work plans, initiative targets, risk models, risk spend efficiency (RSE) calculations, or WMP change orders; and (2) are provided to Energy Safety to provide additional details or context concerning information or statements in your WMP (and any subsequent revisions or change orders affecting your WMP).

RESPONSE 1

SDG&E generally objects to the request on the grounds set forth in General Objections Nos. 1, 2, 3, 5, and 7. Subject to the foregoing objections, SDG&E will address the request in Question 1 as reports are submitted to Energy Safety.

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QUESTION 2

Please provide a copy of your WMP pre-submission within two business days of its submission to Energy Safety.

RESPONSE 2

SDG&E objects to the request on the grounds set forth in General Objections Nos. 1, 5, and 6. SDG&E further objects to the request on the grounds that it is not consistent with the 2023-2025 WMP Process and Evaluation Guidelines (2023 Guidelines) issued by Energy Safety. Per the 2023 Guidelines, the WMP pre-submission is not a public document and does not commence the WMP Review Process (2023 Guidelines at 3). “The completeness check is not a substantive review of WMP content; a substantive review occurs during the WMP evaluation process.” (Id.) Through public dissemination of the WMP pre-submission beyond Energy Safety’s completeness check, Cal Advocates attempts to further extend the WMP review period established by Public Utilities Code Section 8386.3(a) by an additional six weeks. This is both inconsistent with Section 8386.3(a) but also the spirit of the 2023 Guidelines, which establish that the pre-submission process occurs “prior to commencing evaluation.” (2023 Guidelines at 3). SDG&E respectfully requests that, to preserve the three-month review period, Cal Advocates refrain from any public dissemination of the pre-submission. SDG&E further notes that, due to the nature of the pre-submission completeness check process, there may be potential changes to the WMP pre-submission that may occur between now and the actual WMP submission date on March 27, either as required by Energy Safety or as made by SDG&E.

Subject to the foregoing objections, SDG&E responds as follows: SDG&E’s 2023-2025 WMP Pre-submission is attached.

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QUESTION 3

Provide a copy of all documents or files that are referenced in your WMP Quarterly Data Reports and submitted to Energy Safety (including but not limited to all PDFs, spatial data files, non-spatial data files, and confidential attachments) on the same business day that the document is sent to Energy Safety.

RESPONSE 3

SDG&E generally objects to the request on the grounds set forth in General Objections Nos. 1, 2, 3, 5, and 7. Subject to the foregoing objections, SDG&E will address the request as documents and files are made available.

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QUESTION 4

Provide a copy to Cal Advocates of all your confidential responses to WMP discovery requests, on the same business day that you send the documents to the issuer of the discovery request. This includes:

- a) Confidential responses to WMP discovery requests issued by Energy Safety.
- b) Confidential responses to WMP discovery requests issued by other entities.

RESPONSE 4

SDG&E generally objects to the request on the grounds set forth in General Objections Nos. 1, 2, 3, 5, and 7. Subject to the foregoing objections, SDG&E will address the request as documents and files are made available.

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END OF REQUEST