

**PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2023WMP-03
SDG&E RESPONSE**

Date Received: February 07, 2023

Date Submitted: March 07, 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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The following questions relate to your 2023-2025 WMP submission and to work that was completed pursuant to previous years' WMPs.

If a full response to a given question will be included in your WMP submission, your response to that question of this data request may consist of a citation to the specific page(s) or table(s) of the WMP where the information may be found, a written response to the question, or both.

Please note that, for this data request, the geographical regions are mutually exclusive (i.e., "Other HFTD" excludes areas that are in either Tier 2 or Tier 3). Therefore, for any given circuit, the following relationships should hold:

- Tier 2 miles + Tier 3 miles + Other HFTD miles = total HFTD miles.
- Tier 2 miles + Tier 3 miles + Other HFTD miles + non-HFTD miles = total circuit miles.

QUESTION 1

Provide an Excel table of all distribution circuits existing as of January 1, 2023 (as rows) that includes the following information in separate columns.

- a) Circuit name
- b) Circuit ID number
- c) Total circuit miles
- d) Circuit miles in Non-HFTD Areas
- e) Circuit miles in Other HFTD
- f) Circuit miles in HFTD Tier 2
- g) Circuit miles in HFTD Tier 3
- h) Circuit voltage
- i) Circuit SAIDI (System Average Interruption Duration Index) for 2021
- j) Circuit SAIDI (System Average Interruption Duration Index) for 2022
- k) Circuit SAIFI (System Average Interruption Frequency Index) for 2021
- l) Circuit SAIFI (System Average Interruption Frequency Index) for 2022
- m) Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2021
- n) Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2022
- o) Total customer-minutes of de-energization on the circuit due to PSPS events in 2021 (sum of customer-minutes across all PSPS events).
- p) Total customer-minutes of de-energization on the circuit due to PSPS events in 2022 (sum of customer-minutes across all PSPS events).
- q) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2021.

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- r) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2022.
- s) Number of trees that were worked on for EVM in Non-HFTD in 2021
- t) Number of trees that were worked on for EVM in Non-HFTD in 2022
- u) Number of trees that were worked on for EVM in Other HFTD in 2021
- v) Number of trees that were worked on for EVM in Other HFTD in 2022
- w) Number of trees that were worked on for EVM in HFTD Tier 2 in 2021
- x) Number of trees that were worked on for EVM in HFTD Tier 2 in 2022
- y) Number of trees that were worked on for EVM in HFTD Tier 3 in 2021
- z) Number of trees that were worked on for EVM in HFTD Tier 3 in 2022
- aa) Miles of covered conductor installed in Non-HFTD in 2021
- bb) Miles of covered conductor installed in Non-HFTD in 2022
- cc) Miles of covered conductor installed in Other HFTD in 2021
- dd) Miles of covered conductor installed in Other HFTD in 2022
- ee) Miles of covered conductor installed in HFTD Tier 2 in 2021
- ff) Miles of covered conductor installed in HFTD Tier 2 in 2022
- gg) Miles of covered conductor installed in HFTD Tier 3 in 2021
- hh) Miles of covered conductor installed in HFTD Tier 3 in 2022
- ii) Number of poles replaced in Non-HFTD in 2021
- jj) Number of poles replaced in Non-HFTD in 2022
- kk) Number of poles replaced in Other HFTD in 2021
- ll) Number of poles replaced in Other HFTD in 2022
- mm) Number of poles replaced in HFTD Tier 2 in 2021
- nn) Number of poles replaced in HFTD Tier 2 in 2022
- oo) Number of poles replaced in HFTD Tier 3 in 2021
- pp) Number of poles replaced in HFTD Tier 3 in 2022
- qq) Miles of underground conductor installation in Non-HFTD in 2021
- rr) Miles of underground conductor installation in Non-HFTD in 2022
- ss) Miles of underground conductor installation in Other HFTD in 2021
- tt) Miles of underground conductor installation in Other HFTD in 2022
- uu) Miles of underground conductor installation in HFTD Tier 2 in 2021
- vv) Miles of underground conductor installation in HFTD Tier 2 in 2022
- ww) Miles of underground conductor installation in HFTD Tier 3 in 2021
- xx) Miles of underground conductor installation in HFTD Tier 3 in 2022
- yy) Miles of LiDAR inspection in Non-HFTD in 2021
- zz) Miles of LiDAR inspection in Non-HFTD in 2022

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- aaa) Miles of LiDAR inspection in Other HFTD in 2021
- bbb) Miles of LiDAR inspection in Other HFTD in 2022
- ccc) Miles of LiDAR inspection in HFTD Tier 2 in 2021
- ddd) Miles of LiDAR inspection in HFTD Tier 2 in 2022
- eee) Miles of LiDAR inspection in HFTD Tier 3 in 2021
- fff) Miles of LiDAR inspection in HFTD Tier 3 in 2022
- ggg) Number of detailed overhead inspections in Non-HFTD in 2021
- hhh) Number of detailed overhead inspections in Non-HFTD in 2022
- iii) Number of detailed overhead inspections in Other HFTD in 2021
- jjj) Number of detailed overhead inspections in Other HFTD in 2022
- kkk) Number of detailed overhead inspections in HFTD Tier 2 in 2021
- lll) Number of detailed overhead inspections in HFTD Tier 2 in 2022
- mmm) Number of detailed overhead inspections in HFTD Tier 3 in 2021
- nnn) Number of detailed overhead inspections in HFTD Tier 3 in 2022
- ooo) Number of sectionalization devices installed in Non-HFTD in 2021
- ppp) Number of sectionalization devices installed in Non-HFTD in 2022
- qqq) Number of sectionalization devices installed in Other HFTD in 2021
- rrr) Number of sectionalization devices installed in Other HFTD in 2022
- sss) Number of sectionalization devices installed in HFTD Tier 2 in 2021
- ttt) Number of sectionalization devices installed in HFTD Tier 2 in 2022
- uuu) Number of sectionalization devices installed in HFTD Tier 3 in 2021
- vvv) Number of sectionalization devices installed in HFTD Tier 3 in 2022

RESPONSE 1

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 7. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Please see response provided in “CalPA-SDGE-2023WMP-DR03.xlsx.”

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QUESTION 2

Provide an Excel table of all transmission circuits existing as of January 1, 2023 (as rows) that includes the following information in separate columns.

- a) Circuit name
- b) Circuit ID number
- c) Total circuit miles
- d) Circuit miles in Non-HFTD Areas
- e) Circuit miles in Other HFTD
- f) Circuit miles in HFTD Tier 2
- g) Circuit miles in HFTD Tier 3
- h) Circuit voltage
- i) Total customer-minutes of de-energization on the circuit due to PSPS events in 2021 (sum of customer-minutes across all PSPS events).
- j) Total customer-minutes of de-energization on the circuit due to PSPS events in 2022 (sum of customer-minutes across all PSPS events).
- k) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2021.
- l) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2022.
- m) Number of support structures replaced in Non-HFTD in 2021
- n) Number of support structures replaced in Non-HFTD in 2022
- o) Number of support structures replaced in Other HFTD in 2021
- p) Number of support structures replaced in Other HFTD in 2022
- q) Number of support structures replaced in HFTD Tier 2 in 2021
- r) Number of support structures replaced in HFTD Tier 2 in 2022
- s) Number of support structures replaced in HFTD Tier 3 in 2021
- t) Number of support structures replaced in HFTD Tier 3 in 2022
- u) Miles of LiDAR inspection in Non-HFTD in 2021
- v) Miles of LiDAR inspection in Non-HFTD in 2022
- w) Miles of LiDAR inspection in Other HFTD in 2021
- x) Miles of LiDAR inspection in Other HFTD in 2022
- y) Miles of LiDAR inspection in HFTD Tier 2 in 2021
- z) Miles of LiDAR inspection in HFTD Tier 2 in 2022
- aa) Miles of LiDAR inspection in HFTD Tier 3 in 2021
- bb) Miles of LiDAR inspection in HFTD Tier 3 in 2022
- cc) Number of detailed aerial inspections in Non-HFTD in 2021

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- dd) Number of detailed aerial inspections in Non-HFTD in 2022
- ee) Number of detailed aerial inspections in Other HFTD in 2021
- ff) Number of detailed aerial inspections in Other HFTD in 2022
- gg) Number of detailed aerial inspections in HFTD Tier 2 in 2021
- hh) Number of detailed aerial inspections in HFTD Tier 2 in 2022
- ii) Number of detailed aerial inspections in HFTD Tier 3 in 2021
- jj) Number of detailed aerial inspections in HFTD Tier 3 in 2022
- kk) Number of detailed climbing inspections in Non-HFTD in 2021
- ll) Number of detailed climbing inspections in Non-HFTD in 2022
- mm) Number of detailed climbing inspections in Other HFTD in 2021
- nn) Number of detailed climbing inspections in Other HFTD in 2022
- oo) Number of detailed climbing inspections in HFTD Tier 2 in 2021
- pp) Number of detailed climbing inspections in HFTD Tier 2 in 2022
- qq) Number of detailed climbing inspections in HFTD Tier 3 in 2021
- rr) Number of detailed climbing inspections in HFTD Tier 3 in 2022
- ss) Number of detailed ground inspections in Non-HFTD in 2021
- tt) Number of detailed ground inspections in Non-HFTD in 2022
- uu) Number of detailed ground inspections in Other HFTD in 2021
- vv) Number of detailed ground inspections in Other HFTD in 2022
- ww) Number of detailed ground inspections in HFTD Tier 2 in 2021
- xx) Number of detailed ground inspections in HFTD Tier 2 in 2022
- yy) Number of detailed ground inspections in HFTD Tier 3 in 2021
- zz) Number of detailed ground inspections in HFTD Tier 3 in 2022
- aaa) Number of sectionalization devices installed in Non-HFTD in 2021
- bbb) Number of sectionalization devices installed in Non-HFTD in 2022
- ccc) Number of sectionalization devices installed in Other HFTD in 2021
- ddd) Number of sectionalization devices installed in Other HFTD in 2022
- eee) Number of sectionalization devices installed in HFTD Tier 2 in 2021
- fff) Number of sectionalization devices installed in HFTD Tier 2 in 2022
- ggg) Number of sectionalization devices installed in HFTD Tier 3 in 2021
- hhh) Number of sectionalization devices installed in HFTD Tier 3 in 2022
- iii) Miles of transmission ROW expansion performed in Non-HFTD in 2021
- jjj) Miles of transmission ROW expansion performed in Non-HFTD in 2022
- kkk) Miles of transmission ROW expansion performed in Other HFTD in 2021
- lll) Miles of transmission ROW expansion performed in Other HFTD in 2022

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mmm) Miles of transmission ROW expansion performed in HFTD Tier 2 in 2021

nnn) Miles of transmission ROW expansion performed in HFTD Tier 2 in 2022

ooo) Miles of transmission ROW expansion performed in HFTD Tier 3 in 2021

ppp) Miles of transmission ROW expansion performed in HFTD Tier 3 in 2022

RESPONSE 2

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 7. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Please see response provided in “CalPA-SDGE-2023WMP-DR03.xlsx.”

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QUESTION 3

Provide an Excel table of all distribution circuits existing as of January 1, 2022 (as rows) that were removed or decommissioned in 2022, either partially or entirely. This includes permanent removal, removal of overhead lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Include the following information in separate columns.

- a) Circuit name
- b) Circuit ID number
- c) Circuit miles removed or decommissioned in Non-HFTD Areas
- d) Circuit miles removed or decommissioned in Other HFTD
- e) Circuit miles removed or decommissioned in HFTD Tier 2
- f) Circuit miles removed or decommissioned in HFTD Tier 3
- g) Reason(s) for removal or decommissioning

RESPONSE 3

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 7. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Please see response provided in “CalPA-SDGE-2023WMP-DR03.xlsx.”

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QUESTION 4

Provide an Excel table of all transmission circuits existing as of January 1, 2022 (as rows) that were removed or decommissioned in 2022, either partially or entirely. This includes permanent removal, removal of overhead lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Include the following information in separate columns.

- a) Circuit name
- b) Circuit ID number
- c) Circuit miles removed or decommissioned in Non-HFTD Areas
- d) Circuit miles removed or decommissioned in Other HFTD
- e) Circuit miles removed or decommissioned in HFTD Tier 2
- f) Circuit miles removed or decommissioned in HFTD Tier 3
- g) Reason(s) for removal or decommissioning

RESPONSE 4

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 7. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Please see response provided in “CalPA-SDGE-2023WMP-DR03.xlsx.”

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QUESTION 5

For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influenced where you performed work in 2022.

- a) EVM
- b) Covered conductor installation
- c) Undergrounding
- d) Distribution pole replacement
- e) Grid sectionalization
- f) Detailed inspections of distribution assets
- g) Detailed inspections of transmission assets
- h) Aerial inspections of distribution assets
- i) Aerial inspections of transmission assets
- j) LiDAR inspections of distribution assets
- k) LiDAR inspections of transmission assets

RESPONSE 5

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 7. SDG&E further objects to the request on the grounds that it misstates facts or assumes facts that do not exist. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

a) SDG&E Vegetation Management (VM) does not utilize the modeled Wildfire Risk Scores to plan EVM (greater trim clearances) work within specific circuits or circuit segments. VM performs EVM as a component of its routine and off-cycle tree trim activities at the Vegetation Management Area (VMA) level throughout the HFTD. SDG&E follows a static, annual Master Schedule of VM activities for pre-inspection and tree trimming. Work may be prioritized as required if observed conditions warrant during the pre-inspection activity.

While SDG&E's EVM program does not scope work prioritizing circuit risk scores, it does focus on applying expanded post-trim clearances on targeted species identified as higher risk due to growth potential, failure characteristics, and relative outage frequency. The criteria for determining post-trim clearances included multiple factors such as species, height, growth rate, health, location of defect, site conditions, pruning schedule, and proper pruning cuts. In 2022, SDG&E continued to perform required clearing activities on subject poles located within the SRA as required by Public Resources Code Section 4292. The SRA does not align completely with the HFTD boundary, so as an extra precautionary measure, SDG&E will consider additional poles located outside SRA where Public

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Resources Code Section 4292 does not apply, including on poles located within the Local Responsibility Areas.

Additionally in 2022, SDG&E continued to perform vegetation fuels reduction activities surrounding poles located within the HFTD. For this activity, SDG&E does use the Circuit Risk Index and WiNGS modeling to determine areas to perform this work.

b) Covered conductor installation

The Wildfire Risk Scores are an output from the WiNGS-Planning Model and support with the prioritization of hardening. Currently, Risk Spend Efficiencies (RSEs) in the WiNGS-Planning are used to inform how to invest in mitigations that reduce risk. The WiNGS-Planning analyzes each circuit-segment to recommend strategic undergrounding (UG), covered conductor (CC) or no UG / CC. Although the risk reduction targets are often aimed at cost effectiveness, annual performance objectives, mileage targets, and other limitations and constraints are also considered to inform investment decisions.

c) Undergrounding

Please see response 5 (b).

d) SDG&E did not complete any work for the Distribution Pole Replacement program in 2022. The future planned work for this program will have multiple risk categories and will be prioritized based on these categories.

- Phase 1 (approximately 85 poles): Pole set in concrete and steel reinforced or pole set in concrete and not steel reinforced
- Phase 2 (approximately 58 poles): Pole set in soil and steel reinforced
- Phase 3 (approximately 1,379 poles): Pole set in soil and not steel reinforced

e) SDG&E Grid Sectionalization program receives feedback from meteorology for PSPS opportunities based on new grid hardening projects such as Covered Conductor and Strategic Undergrounding in addition to stand-alone switch installations. SDG&E District Engineers also perform evaluations on the value of new switches by prioritizing customer impacts; they provide recommendations based on historical events and submit work order requests for new installations.

f) Detailed inspections of distribution assets are mandated by GO 165, which determines the timeframe and cycle for performing inspections. Per GO 165, detailed inspections of overhead facilities are currently completed on a 5-year cycle for all overhead structures, including those in the HFTD. Although the modeled wildfire risk scores for each circuit are not explicitly used to determine where inspections are performed, non-routine ad hoc inspections may be conducted for operational or reliability purposes and consider various factors such as location and risk. Additionally, SDG&E

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prioritizes detailed inspections in the HFTD prior to fire season. Detailed inspections are also supplemented by risk-informed drone inspections.

g) SDG&E does not currently model wildfire risk scores for transmission tielines; therefore, modeled wildfire risk scores did not influence where detailed inspections of transmission assets in 2022 were performed.

h) The drone inspection program began in 2019, and its scope included all distribution structures in Tier 2 and Tier 3 of the HFTD and coastal canyon areas within the WUI. SDG&E successfully completed this program in 2022 inspecting every structure in the aforementioned regions. Circuit risk ranking in combination with a list of circuits that had previously been subject to a Public Safety Power Shutoff (PSPS) event was used to prioritize which circuits were inspected prior to others within that HFTD. For Tier 2 HFTD circuits, the circuit risk ranking was provided in response to CALPA DR5 Q9.

i) SDG&E does not currently model wildfire risk scores for transmission tielines; therefore, modeled wildfire risk scores did not influence where aerial inspections of transmission assets in 2022 were performed. Aerial inspections were instead prioritized based on historical outage or fault data.

j) In 2022, all distribution circuits within the HFTD had Light Detection and Ranging (LiDAR) data captured and processed. SDG&E did not utilize modeled wildfire risk scores to determine the scope of this program because all distribution circuits in the HFTD were included.

k) SDG&E did not perform LiDAR inspections of transmission assets in 2022 except where there was distribution underbuilt on the structure.

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QUESTION 6

For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influenced how work in 2022 was sequenced.

- a) EVM
- b) Covered conductor installation
- c) Undergrounding
- d) Distribution pole replacement
- e) Grid sectionalization
- f) Detailed inspections of distribution assets
- g) Detailed inspections of transmission assets
- h) Aerial inspections of distribution assets
- i) Aerial inspections of transmission assets
- j) LiDAR inspections of distribution assets
- k) LiDAR inspections of transmission assets

RESPONSE 6

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 7. SDG&E further objects to the request to the extent it misstates facts and/or assumes facts that do not exist. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

a) SDG&E Vegetation Management (VM) does not utilize the modeled Wildfire Risk Scores to plan EVM (greater trim clearances) work within specific circuits or circuit segments. VM performs EVM as part of its routine and off-cycle tree trim activities at the Vegetation Management Area (VMA) level throughout the HFTD. SDG&E follows a static, annual Master Schedule of VM activities for pre-inspection and tree trimming. Work may be prioritized as required if observed conditions warrant during the pre-inspection activity.

b) Covered conductor installation

The Wildfire Risk Scores are an output from the WiNGS-Planning Model and support with the prioritization of hardening. Additional considerations such as efficiencies that can reduce the resource burden are considered. Limiting projects to geographically proximate locations can optimize survey time (reducing travel times for teams fielding the fire hardening scope), limit mobilization/demobilization for construction crews, and optimize use of existing laydown yards. Long-term planning is also considered to ensure that year-over-year mileage targets are met. After the circuit-segment mitigation projects have been selected and prioritized, a desktop scoping and feasibility study is performed which includes geography, prior hardening, loading,

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standards, land/environmental, operational improvements, easement constraints, reliability improvements, and construction cost savings all help to dictate the sequence of projects.

c) Undergrounding

Please see response 6 (b).

d) For the Distribution Pole Replacement Program, Phase 1 poles would be addressed first, followed by Phase 2 then Phase 3. However, permitting, land rights, environmental mitigation, customer concerns, or a combination of these factors will drive the ultimate schedule on each pole's replacement. Where feasible, poles will be bundled together in a single work package to minimize the impact to the community and gain efficiency in the design, environmental, permitting, land rights, and construction process. In most cases a single work order package will bundle poles that are adjacent or within a few spans of each other and will require similar land rights, permitting, and/or land rights.

e) SDG&E Grid Sectionalization program is sequenced based on input from multiple stakeholders who determine where the greatest customer impacts can be realized. When this evaluation is performed in association with work being performed associated with hardening initiatives such as Covered Conductor or Strategic Undergrounding, it is sequenced according to that program.

f) Detailed inspections of distribution assets are mandated by GO 165, which determines the timeframe and cycle for performing inspections. GO 165 also prescribes the acceptable interval, a 4-month period within the calendar year, which dictates the sequencing of inspections throughout the year. Although the modeled wildfire risk scores for each circuit are not explicitly used to determine the sequencing of inspections, SDG&E prioritizes detailed inspections in the HFTD prior to fire season and has shifted inspections into earlier intervals to address risk. Non-routine, ad hoc inspections may be conducted for operational or reliability purposes and consider various factors such as location and risk. Additionally, detailed inspections are also supplemented by risk-informed drone inspections.

g) SDG&E does not currently model wildfire risk scores for transmission tielines; therefore, modeled wildfire risk scores did not influence how detailed inspections of transmission assets in 2022 were sequenced.

h) The drone inspection program began in 2019, and its scope included all distribution structures in Tier 2 and Tier 3 of the HFTD and coastal canyon areas within the WUI. SDG&E successfully completed this program in 2022 inspecting every structure in aforementioned regions. Circuit risk ranking in combination with a list of circuits that had previously been subject to a Public Safety Power Shutoff (PSPS) event was used to prioritize which circuits were inspected prior to others within that HFTD. For Tier 2 HFTD circuits, the circuit risk ranking was provided CALPA DR5 Q9.

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i) SDG&E does not currently model wildfire risk scores for transmission tielines; therefore, modeled wildfire risk scores did not influence how aerial inspections of transmission assets in 2022 were sequenced.

j) LiDAR inspections of distribution assets were captured for the entire HFTD. The sequencing of the work was not based on risk scores. The LiDAR data was captured by capturing all the circuits in a certain region to minimize the number of flights required to complete the data capture.

k) SDG&E did not perform LiDAR inspections of transmission assets in 2022 except where there was distribution underbuilt on the structure.

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QUESTION 7

For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence where you plan to perform work in 2023.

- a) EVM
- b) Covered conductor installation
- c) Undergrounding
- d) Distribution pole replacement
- e) Grid sectionalization
- f) Detailed inspections of distribution assets
- g) Detailed inspections of transmission assets
- h) Aerial inspections of distribution assets
- i) Aerial inspections of transmission assets
- j) LiDAR inspections of distribution assets
- k) LiDAR inspections of transmission assets

RESPONSE 7

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 7. SDG&E further objects to the request to the extent it misstates facts and/or assumes facts that do not exist. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

a) SDG&E Vegetation Management (VM) does not utilize the modeled Wildfire Risk Scores to plan EVM (greater trim clearances) work within specific circuits or circuit segments. VM performs EVM as part of its routine and off-cycle tree trim activities at the Vegetation Management Area (VMA) level throughout the HFTD. SDG&E follows a static, annual Master Schedule of VM activities for pre-inspection and tree trimming. Work may be prioritized as required if observed conditions warrant during the pre-inspection activity.

While SDG&E's EVM program does not scope work prioritizing circuit risk scores, it does focus on applying expanded post-trim clearances on targeted species identified as higher risk due to growth potential, failure characteristics, and relative outage frequency. The criteria for determining post-trim clearances included multiple factors such as species, height, growth rate, health, location of defect, site conditions, pruning schedule, and proper pruning cuts. In 2023, SDG&E will continue to perform required clearing activities on subject poles located within the SRA as required by Public Resources Code Section 4292. The SRA does not align completely with the HFTD boundary, so as an extra precautionary measure, SDG&E will consider additional poles located outside SRA where Public Resources Code Section 4292 does not apply, including on poles located within the Local Responsibility Areas.

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Additionally in 2023, SDG&E will continue to perform vegetation fuels reduction activities surrounding poles located within the HFTD. For this activity, SDG&E does use the Circuit Risk Index and WiNGS modeling to determine areas to perform this work.

b) Covered conductor installation

Please see response 5 (b).

c) Undergrounding

Please see response 5 (b).

d) SDG&E Distribution Pole Replacement does not utilize the modeled Wildfire Risk Scores to plan pole replacement work within specific circuits or circuit segments. The program will have multiple risk categories and will be prioritized based on these categories.

- Phase 1 (approximately 85 poles): Pole set in concrete and steel reinforced or pole set in concrete and not steel reinforced
- Phase 2 (approximately 58 poles): Pole set in soil and steel reinforced
- Phase 3 (approximately 1,379 poles): Pole set in soil and not steel reinforced

e) SDG&E Grid Sectionalization program receives feedback from meteorology for PSPS opportunities based on new grid hardening projects such as Covered Conductor and Strategic Undergrounding in addition to stand-alone switch installations. SDG&E District Engineers also perform evaluations on the value of new switches by prioritizing customer impacts; they provide recommendations based on historical events and submit work order requests for new installations.

f) Detailed inspections of distribution assets are mandated by GO 165, which determines the timeframe and cycle for performing inspections. Per GO 165, detailed inspections of overhead facilities are currently completed on a 5-year cycle for all overhead structures, including those in the HFTD, and is not expected to change in 2023. Although the modeled wildfire risk scores for each circuit are not explicitly used to determine where inspections are performed, non-routine, ad hoc inspections may be conducted for operational or reliability purposes and consider various factors such as location and risk. Additionally, SDG&E prioritizes detailed inspections in the HFTD prior to fire season. Detailed inspections are also supplemented by risk-informed drone inspections.

g) SDG&E does not currently model wildfire risk scores for transmission tielines; therefore, modeled wildfire risk scores will not influence where detailed inspections of transmission assets in 2023 are performed.

h) The structures selected for SDG&E's 2023 aerial drone inspections are identified by using a semiautomated Inspection Prioritization Model that combines PoF and consequence of failure (CoF) to determine structure risk and account for navigation efficiency. The program considers the riskiest

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15 percent of overhead distribution structures within the HFTD and WUI. The model aligns with existing methods considering MAVF to identify and quantify risk and is easily modified to account for new attributes or changes in scope.

i) SDG&E does not currently model wildfire risk scores for transmission tielines; therefore, modeled wildfire risk scores will not influence where aerial inspections of transmission assets in 2023 are performed.

j) Because the entire HFTD was captured in 2022, a large-scale LiDAR collection initiative will not be implemented again for several years. However, LiDAR will continue to be captured to support pole loading calculations as needed for system hardening projects such as covered conductor and traditional overhead hardening, which are scoped in part utilizing modeled wildfire risk scores. LiDAR is needed to complete PLS-CADD during pre-construction and post-construction to verify compliance with GO95 and SDG&E standards and specifications.

k) SDG&E will not perform LiDAR inspections of transmission assets in 2023.

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QUESTION 8

For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence how work in 2023 will be sequenced.

- a) EVM
- b) Covered conductor installation
- c) Undergrounding
- d) Distribution pole replacement
- e) Grid sectionalization
- f) Detailed inspections of distribution assets
- g) Detailed inspections of transmission assets
- h) Aerial inspections of distribution assets
- i) Aerial inspections of transmission assets
- j) LiDAR inspections of distribution assets
- k) LiDAR inspections of transmission assets

RESPONSE 8

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 7. SDG&E further objects to the request to the extent it misstates facts and/or assumes facts that do not exist. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

a) SDG&E Vegetation Management (VM) does not utilize the modeled Wildfire Risk Scores to plan EVM (greater trim clearances) work within specific circuits or circuit segments. VM performs EVM as part of its routine and off-cycle tree trim activities at the Vegetation Management Area (VMA) level throughout the HFTD. SDG&E follows a static, annual Master Schedule of VM activities for pre-inspection and tree trimming. Work may be prioritized as required if observed conditions warrant during the pre-inspection activity.

b) Covered conductor installation
Please see response 6 (b).

c) Undergrounding
Please see response 6 (b).

d) For the Distribution Pole Replacement Program, Phase 1 poles would be addressed first, followed by Phase 2 then Phase 3. However, permitting, land rights, environmental mitigation, customer

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concerns, or a combination of these factors will drive the ultimate schedule on each pole's replacement. Where feasible, poles will be bundled together in a single work package to minimize the impact to the community and gain efficiency in the design, environmental, permitting, land rights, and construction process. In most cases a single work order package will bundle poles that are adjacent or within a few spans of each other and will require similar land rights, permitting, and/or land rights.

e) SDG&E Grid Sectionalization program is sequenced based on input from multiple stakeholders who determine where the greatest customer impacts can be realized. When this evaluation is performed in association with work being performed associated with hardening initiatives such as Covered Conductor or Strategic Undergrounding it is sequenced according to that program.

f) Detailed inspections of distribution assets are mandated by GO 165, which determines the timeframe and cycle for performing inspections. GO 165 also prescribes the acceptable interval, a 4-month period within the calendar year, which dictates the sequencing of inspections throughout the year and is not expected to change in 2023. Although the modeled wildfire risk scores for each circuit are not explicitly used to determine the sequencing of inspections, SDG&E prioritizes detailed inspections in the HFTD prior to fire season and has shifted inspections into earlier intervals to address risk. Non-routine, ad hoc inspections may be conducted for operational or reliability purposes and consider various factors such as location and risk. Additionally, detailed inspections are also supplemented by risk-informed drone inspections.

g) SDG&E does not currently model wildfire risk scores for transmission tielines; therefore, modeled wildfire risk scores will not influence how detailed inspections of transmission assets in 2023 are sequenced.

h) In 2023, the aerial drone inspection program considers the riskiest 15 percent of overhead distribution structures within the HFTD and WUI as described in Response 7h. The sequencing of these inspections is determined by navigation efficiencies and obtaining necessary landowner authorizations. For example, inspections within Department of Defense areas require waiver approval by the board and permission by the base depending on the area within the based that flights are requested. In addition, we have specific authorization to perform inspections on State Parks lands and need to provide advance notification with U.S. Forest Service, Bureau of Land Management, Tribal Governments and other entities, such as water districts.

i) SDG&E does not currently model wildfire risk scores for transmission tielines; therefore, modeled wildfire risk scores will not influence how aerial inspections of transmission assets in 2023 are sequenced.

j) Because the entire HFTD was captured in 2022, a large-scale LiDAR collection initiative will not be implemented again for several years. However, LiDAR will continue to be captured to support pole loading calculations as needed for system hardening projects such as covered conductor and traditional overhead hardening, which are scoped in part utilizing modeled wildfire risk scores.

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LiDAR is needed to complete PLS-CADD during pre-construction and post-construction to verify compliance with GO95 and SDG&E standards and specifications.

k) SDG&E will not perform LiDAR inspections of transmission assets in 2023.

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QUESTION 9

For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence where you plan to perform work in 2024.

- a) EVM
- b) Covered conductor installation
- c) Undergrounding
- d) Distribution pole replacement
- e) Grid sectionalization
- f) Detailed inspections of distribution assets
- g) Detailed inspections of transmission assets
- h) Aerial inspections of distribution assets
- i) Aerial inspections of transmission assets
- j) LiDAR inspections of distribution assets
- k) LiDAR inspections of transmission assets

RESPONSE 9

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 7. SDG&E further objects to the request to the extent it misstates facts and/or assumes facts that do not exist. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

a) SDG&E Vegetation Management (VM) does not utilize the modeled Wildfire Risk Scores to plan EVM (greater trim clearances) work within specific circuits or circuit segments. VM performs EVM as part of its routine and off-cycle tree trim activities at the Vegetation Management Area (VMA) level throughout the HFTD. SDG&E follows a static, annual Master Schedule of VM activities for pre-inspection and tree trimming. Work may be prioritized as required if observed conditions warrant during the pre-inspection activity.

While SDG&E's EVM program does not scope work prioritizing circuit risk scores, it does focus on applying expanded post-trim clearances on targeted species identified as higher risk due to growth potential, failure characteristics, and relative outage frequency. The criteria for determining post-trim clearances included multiple factors such as species, height, growth rate, health, location of defect, site conditions, pruning schedule, and proper pruning cuts. In 2024, SDG&E will continue to perform required clearing activities on subject poles located within the SRA as required by Public Resources Code Section 4292. The SRA does not align completely with the HFTD boundary, so as an extra precautionary measure, SDG&E will consider additional poles located outside SRA where Public Resources Code Section 4292 does not apply, including on poles located within the Local Responsibility Areas.

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Additionally in 2024, SDG&E will continue to perform vegetation fuels reduction activities surrounding poles located within the HFTD. For this activity, SDG&E does use the Circuit Risk Index and WiNGS modeling to determine areas to perform this work.

b) Covered conductor installation

Please see response 5 (b).

c) Undergrounding

Please see response 5 (b).

d) SDG&E Distribution Pole Replacement does not utilize the modeled Wildfire Risk Scores to plan pole replacement work within specific circuits or circuit segments. The program will have multiple risk categories and will be prioritized based on these categories.

- Phase 1 (approximately 85 poles): Pole set in concrete and steel reinforced or pole set in concrete and not steel reinforced
- Phase 2 (approximately 58 poles): Pole set in soil and steel reinforced
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e) SDG&E Grid Sectionalization program receives feedback from meteorology for PSPS opportunities based on new grid hardening projects such as Covered Conductor and Strategic Undergrounding in addition to stand-alone switch installations. SDG&E District Engineers also perform evaluations on the value of new switches by prioritizing customer impacts; they provide recommendations based on historical events and submit work order requests for new installations.

f) Detailed inspections of distribution assets are mandated by GO 165, which determines the timeframe and cycle for performing inspections. Per GO 165, detailed inspections of overhead facilities are currently completed on a 5-year cycle for all overhead structures, including those in the HFTD, and is not expected to change in 2024. Although the modeled wildfire risk scores for each circuit are not explicitly used to determine where inspections are performed, non-routine, ad hoc inspections may be conducted for operational or reliability purposes and consider various factors such as location and risk. Additionally, SDG&E prioritizes detailed inspections in the HFTD prior to fire season. Detailed inspections are also supplemented by risk-informed drone inspections.

g) SDG&E does not currently model wildfire risk scores for transmission tielines; therefore, modeled wildfire risk scores will not influence where detailed inspections of transmission assets in 2024 are performed.

h) The structures selected for SDG&E's 2024 aerial drone inspections will be identified using a semiautomated Inspection Prioritization Model that combines PoF and consequence of failure (CoF) to determine structure risk and account for navigation efficiency. The program considers the riskiest

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15 percent of overhead distribution structures within the HFTD and WUI. The model aligns with existing methods considering MAVF to identify and quantify risk and is easily modified to account for new attributes or changes in scope.

i) SDG&E does not currently model wildfire risk scores for transmission tielines; therefore, modeled wildfire risk scores will not influence where aerial inspections of transmission assets in 2024 are performed.

j) Because the entire HFTD was captured in 2022, a large-scale LiDAR collection initiative will not be implemented again for several years. However, LiDAR will continue to be captured to support pole loading calculations as needed for system hardening projects such as covered conductor and traditional overhead hardening, which are scoped in part utilizing modeled wildfire risk scores. LiDAR is needed to complete PLS-CADD during pre-construction and post-construction to verify compliance with GO95 and SDG&E standards and specifications.

k) SDG&E will not perform LiDAR inspections of transmission assets in 2024.

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QUESTION 10

For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit-segment influence how work in 2024 will be sequenced.

- a) EVM
- b) Covered conductor installation
- c) Undergrounding
- d) Distribution pole replacement
- e) Grid sectionalization
- f) Detailed inspections of distribution assets
- g) Detailed inspections of transmission assets
- h) Aerial inspections of distribution assets
- i) Aerial inspections of transmission assets
- j) LiDAR inspections of distribution assets
- k) LiDAR inspections of transmission assets

RESPONSE 10

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 7. SDG&E further objects to the request to the extent it misstates facts and/or assumes facts that do not exist. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

a) SDG&E Vegetation Management (VM) does not utilize the modeled Wildfire Risk Scores to plan EVM (greater trim clearances) work within specific circuits or circuit segments. VM performs EVM as part of its routine and off-cycle tree trim activities at the Vegetation Management Area (VMA) level throughout the HFTD. SDG&E follows a static, annual Master Schedule of VM activities for pre-inspection and tree trimming. Work may be prioritized as required if observed conditions warrant during the pre-inspection activity.

b) Covered conductor installation
Please see response 6 (b).

c) Undergrounding
Please see response 6 (b).

d) For the Distribution Pole Replacement Program, Phase 1 poles would be addressed first, followed by Phase 2 then Phase 3. However, permitting, land rights, environmental mitigation, customer

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concerns, or a combination of these factors will drive the ultimate schedule on each pole's replacement. Where feasible, poles will be bundled together in a single work package to minimize the impact to the community and gain efficiency in the design, environmental, permitting, land rights, and construction process. In most cases a single work order package will bundle poles that are adjacent or within a few spans of each other and will require similar land rights, permitting, and/or land rights.

e) SDG&E Grid Sectionalization program is sequenced based on input from multiple stakeholders who determine where the greatest customer impacts can be realized. When this evaluation is performed in association with work being performed associated with hardening initiatives such as Covered Conductor or Strategic Undergrounding it is sequenced according to that program.

f) Detailed inspections of distribution assets are mandated by GO 165, which determines the timeframe and cycle for performing inspections. GO 165 also prescribes the acceptable interval, a 4-month period within the calendar year, which dictates the sequencing of inspections throughout the year and is not expected to change in 2024. Although the modeled wildfire risk scores for each circuit are not explicitly used to determine the sequencing of inspections, SDG&E prioritizes detailed inspections in the HFTD prior to fire season and has shifted inspections into earlier intervals to address risk. Non-routine, ad hoc inspections may be conducted for operational or reliability purposes and consider various factors such as location and risk. Additionally, detailed inspections are also supplemented by risk-informed drone inspections.

g) SDG&E does not currently model wildfire risk scores for transmission tielines; therefore, modeled wildfire risk scores will not influence how detailed inspections of transmission assets in 2024 are sequenced.

h) In 2024, the aerial drone inspection program will consider the riskiest 15 percent of overhead distribution structures within the HFTD and WUI as described in Response 9h. The sequencing of the work will be performed as described in response in 8h, the sequencing of these inspections will be determined by navigation efficiencies and obtaining necessary landowner authorizations.

i) SDG&E does not currently model wildfire risk scores for transmission tielines; therefore, modeled wildfire risk scores will not influence how aerial inspections of transmission assets in 2023 are sequenced.

j) Because the entire HFTD was captured in 2022, a large-scale LiDAR collection initiative will not be implemented again for several years. However, LiDAR will continue to be captured to support pole loading calculations as needed for system hardening projects such as covered conductor and traditional overhead hardening, which are scoped in part utilizing modeled wildfire risk scores. LiDAR is needed to complete PLS-CADD during pre-construction and post-construction to verify compliance with GO95 and SDG&E standards and specifications.

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k) SDG&E will not perform LiDAR inspections of transmission assets in 2024.

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END OF REQUEST