

**PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2023WMP-04
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.

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.

QUESTION 1

For any WMP initiative for which you forecast capital expenditures in 2023 to be at least two times actual capital expenditures in 2022, please provide:

- a) The name of the initiative as it is identified in your 2023-2025 WMP
- b) The WMP Initiative number in Table 11 of your 2023-2025 WMP
- c) The name of the initiative as it is identified in your 2022 WMP Update
- d) The WMP Initiative number in Table 12 of your 2022 WMP Update
- e) An explanation for the projected increase.

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:

- 1.
 - a. Emergency preparedness plan
 - b. WMP.1008
 - c. Community outreach, public awareness, and communications efforts
 - d. 7.3.9.2
 - e. The projected increase is related to construction of the Wildfire and Climate Resilience Center (WCRC). The construction costs are a one-time expense that are expected to be mostly spent in 2023. Information on the WCRC will be reported in SDG&E's 2023 WMP in section 8.4.3.4.
- 2.
 - a. Transmission OH Hardening – Distribution Underbuild
 - b. WMP.545
 - c. Overhead transmission fire hardening (Distribution Underbuilt)
 - d. 7.3.3.17.2.3

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e. The expected construction in 2022 experienced permitting delays resulted in lower construction costs. SDG&E only completed 0.6 miles of hardening for this initiative in 2022 which drove the lower than expected spend in 2022.

3.

a. Microgrids

b. WMP.462

c. Microgrids

d. 7.3.3.8.2

e. SDG&E experienced delays acquiring appropriate and sufficient land rights for the microgrid projects and has been delayed in deploying the permanent renewable solutions. This has shifted spend from 2022 into 2023 and 2024.

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QUESTION 2

For any WMP initiative for which you forecast capital expenditures in 2024 to be at least two times actual capital expenditures in 2022, please provide:

- a) The name of the initiative as it is identified in your 2023-2025 WMP
- b) The WMP Initiative number in Table 11 of your 2023-2025 WMP
- c) The name of the initiative as it is identified in your 2022 WMP Update
- d) The WMP Initiative number in Table 12 of your 2022 WMP Update
- e) An explanation for the projected increase.

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:

- 1.
 - a. Strategic Undergrounding
 - b. WMP.473
 - c. Undergrounding of electric lines and/or equipment
 - d. 7.3.3.16
 - e. The number of miles completed for strategic undergrounding is increasing from 65 miles completed in 2022 to 125 miles planned for 2024.

- 2.
 - a. Transmission OH Hardening – Distribution Underbuild
 - b. WMP.545
 - c. Overhead transmission fire hardening (Distribution Underbuild)
 - d. 7.3.3.17.2.3
 - e. The expected construction in 2022 experienced permitting delays and resulted in lower construction costs. SDG&E only completed 0.6 miles of hardening for this initiative in 2022 which drove the lower than expected spend in 2022.

- 3.
 - a. Microgrids
 - b. WMP.462
 - c. Microgrids
 - d. 7.3.3.8.2
 - e. SDG&E experienced delays acquiring appropriate and sufficient land rights for the microgrid projects and has been delayed in deploying the permanent renewable solutions. This has shifted spend from 2022 into 2023 and 2024.

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4.
 - a. Environmental monitoring systems (Advanced weather monitoring)
 - b. WMP.447
 - c. Advanced weather monitoring and weather stations
 - d. 7.3.2.1
 - e. SDG&E plans to continue improvements to the weather station network such as upgrading batteries, charging regulators, and enhancing weather sensor dashboards.

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QUESTION 3

For any WMP initiative for which you forecast operating expenditures in 2023 to be at least two times actual operating expenditures in 2022, please provide:

- a) The name of the initiative as it is identified in your 2023-2025 WMP
- b) The WMP Initiative number in Table 11 of your 2023-2025 WMP
- c) The name of the initiative as it is identified in your 2022 WMP Update
- d) The WMP Initiative number in Table 12 of your 2022 WMP Update
- e) An explanation for the projected increase.

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:

1.
 - a. Strategic Undergrounding
 - b. WMP.473
 - c. Undergrounding of electric lines and/or equipment
 - d. 7.3.3.16
 - e. SDG&E had lower than expected operating expenditures (0.14% of capital expenditure) for undergrounding completed in 2022. SDG&E expects operating expenditures to increase to 0.2% of capital expenditures in 2023.
2.
 - a. Early Fault Detection
 - b. WMP.1195
 - c. N/A (was included within Installation of system automation equipment)
 - d. N/A (was included within 7.3.3.9)
 - e. Early Fault Detection is a relatively new program and only incurred operating expenses of one thousand dollars in 2022. As the program grows and more sensors are installed, and more data is ingested, the operating expenses will increase.
3.
 - a. A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment
 - b. WMP.442

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c. A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment

d. 7.3.1.1

e. The increased costs associated with this initiative are driven by higher expected labor costs in 2023 associated with additional full time employees that started halfway through 2022 and four additional employees with a planned start date in the second quarter of 2023. Non-labor costs also increase for this initiative as there are additional expenses for contractors associated with developing and validating SDG&E's risk modeling.

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QUESTION 4

For any WMP initiative for which you forecast operating expenditures in 2024 to be at least two times actual operating expenditures in 2022, please provide:

- a) The name of the initiative as it is identified in your 2023-2025 WMP
- b) The WMP Initiative number in Table 11 of your 2023-2025 WMP
- c) The name of the initiative as it is identified in your 2022 WMP Update
- d) The WMP Initiative number in Table 12 of your 2022 WMP Update
- e) An explanation for the projected increase.

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:

- 1.
 - a. Avian Protection
 - b. WMP.972
 - c. Avian Mitigation
 - d. 7.3.3.18.3
 - e. SDG&E had lower than expected operating expenditures (0.86% of capital expenditure) for the avian protection work completed in 2022. SDG&E expects operating expenditures to increase to 4% of capital expenditures in 2024.

- 2.
 - a. Generator Grant Program
 - b. WMP.466
 - c. Generator Grant Program
 - d. 7.3.3.11.1
 - e. SDG&E had lower than expected expenditures associated with the Generator Grant Program in 2022 because SDG&E did not experience any PSPS events. The lack of PSPS activations drove participation in SDG&E's resiliency programs down in 2022. Expenditures in 2024 are expected to return to normal levels of participation assuming PSPS activations return to average levels.

- 3.
 - a. Generator Assistance Program

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b. WMP.467

c. Generator Assistance Program

d. 7.3.3.11.3

e. SDG&E had lower than expected expenditures associated with the Generator Assistance Program in 2022 because SDG&E did not experience any PSPS events. The lack of PSPS activations drove participation in SDG&E's resiliency programs down in 2022. Expenditures in 2024 are expected to return to normal levels of participation assuming PSPS activations return to average levels.

4.

a. Strategic Undergrounding

b. WMP.473

c. Undergrounding of electric lines and/or equipment

d. 7.3.3.16

e. SDG&E had lower than expected operating expenditures (0.14% of capital expenditure) for undergrounding completed in 2022. SDG&E expects operating expenditures to increase to approximately 1% of capital expenditures in 2024.

5.

a. Early Fault Detection

b. WMP.1195

c. N/A (was included within Installation of system automation equipment)

d. N/A (was included within 7.3.3.9)

e. Early Fault Detection is a relatively new program and only incurred operating expenses of one thousand dollars in 2022. As the program grows and more sensors are installed, and more data is ingested, the operating expenses will increase.

6.

a. Allocation methodology development and application

b. WMP.523

c. Allocation methodology development and application

d. 7.3.8.1

e. SDG&E had lower than expected operating expenditures for this initiative in 2022 due to lower than planned labor costs. SDG&E expects to hire additional FTEs in 2024 to assist with additional workload including wildfire mitigation personnel, risk management, and PSPS.

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