

**PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2023WMP-05
SDG&E RESPONSE**

Date Received: February 10, 2023

Date Submitted: March 10, 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 undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

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10. SDG&E objects generally to each request that calls for information that contains trade secrets, is privileged or otherwise entitled to confidential protection by reference to statutory protection. SDG&E objects to providing such information absent an appropriate protective order.

II. EXPRESS RESERVATIONS

1. No response, objection, limitation, or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.
2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.
3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.
4. These responses are made solely for the purpose of this proceeding and for no other purpose.

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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.

Risk Modeling:

QUESTION 1

- a) Have you identified transportation corridors within your service territory where falling or failing lines or poles could currently limit egress and/or ingress during an emergency?
- b) If the answer to part (a) is yes, please describe how you identify such transportation corridors.
- c) If available, please provide a geospatial data file that contains all current identified transportation corridors with ingress and egress hazards.

RESPONSE 1

SDG&E objects to the request on the grounds set forth in General Objections, 2, 5, and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a) Corridors in SDG&E's service territory where asset failure could limit egress/ingress during an emergency have not been identified. SDG&E is prepared to support the needs of first responders through participation in the County Evacuation Committee, the staffing of 24/7 response staff to respond to incidents, and regular training with first responder agencies. During real world incidents requiring evacuation, SDG&E serves as a cooperator at the incident command post and follows the ICS command structure to ensure life safety is the highest priority.
- b) N/A
- c) N/A

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QUESTION 2

In response to Data Request CalAdvocates-SDG&E-2022WMP-13 on March 30, 2022, SDG&E provided information regarding its Wildfire Risk Reduction Model (WRRM-Ops) and stated “Currently the Technosylva Wildfire Analyst Enterprise software does not incorporate suppression effectiveness into simulations. However, development of a suppression effectiveness model is currently underway and being tested for implementation during the California 2022 fire season.”

- a) What is the current status of the effort to develop a suppression effectiveness model described in the quote above?
- b) Has SDG&E updated its WRRM-Ops model since its response referenced above, to incorporate fire suppression effectiveness?
- c) If the answer to part (b) is yes, when did SDG&E start to incorporate the additional factor of fire suppression effectiveness into its wildfire risk simulations?

RESPONSE 2

SDG&E objects to the request on the grounds set forth in General Objections, 2, 5, and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a) Due to the number of variables that would go into accurate suppression modeling and that these variables would be significantly impacted by human and other factors it has been determined that incorporating suppression into operational models can create issues when applying model outputs to real world outcomes. WFA does model what is named their Initial Attack Index and is referenced in the CalAdvocates-SDG&E-2022WMP-13, from available inputs which may enable a SME to estimate the effectiveness of suppression. Factors that are considered by a SME include but are not limited to staffing levels, location relative to responding resources, other active incidents, and the accessibility of the incident. By excluding suppression, model outputs can more effectively be compared to each other because of consistent assumptions. It is also important to remember that the operational picture may change minute to minute and tactical actions taken in the field are typically based on real world observation.
- b) No, see answer a.
- c) NA

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QUESTION 3

Provide an Excel table of all distribution circuit-segments that traverse HFTD areas (i.e., the segment has greater than 0 circuit-miles in HFTD) existing as of January 1, 2023.

The Excel table should list each such circuit-segment as a row and include the following information in separate columns.

For items (n) and (r), please include all relevant risk scores. For example, include vegetation risk score, conductor risk score, and any other driver-specific risk scores you have developed.

Please insert additional columns as needed to accommodate this:

- a) Circuit name for the circuit that each segment is part of
- b) Circuit ID for the circuit that each segment is part of
- c) Name or ID number of each circuit segment
- d) Nominal voltage
- e) Total circuit-miles on the circuit-segment
- f) Overhead circuit-miles on the circuit-segment in Non-HFTD Areas
- g) Overhead circuit-miles on the circuit-segment in HFTD Tier 2
- h) Overhead circuit-miles on the circuit-segment in HFTD Tier 3
- i) Underground circuit-miles on the circuit-segment in Non-HFTD Areas
- j) Underground circuit-miles on the circuit-segment in HFTD Tier 2
- k) Underground circuit-miles on the circuit-segment in HFTD Tier 3
- l) Probability of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing
- m) Consequence of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing
- n) Total wildfire risk score(s) for the circuit-segment, according to the risk model you used for your 2022 WMP filing. Insert additional columns if needed
- o) Power Safety Power Shutoff (PSPS) risk score for the circuit-segment, according to the risk model you used for your 2022 WMP filing

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- p) Probability of ignition score for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing
- q) Consequence of ignition score for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing
- r) Total wildfire risk score(s) for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing. Insert additional columns if needed
- s) Power Safety Power Shutoff (PSPS) risk score for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing.

RESPONSE 3

SDG&E objects to the request on the grounds set forth in General Objections, 2, 5, and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Please see attachment named “dr_ca_5_q3_nb_output_RDF_2023_03_03.xlsx”

Circuit/segment IDs are reflective of the current state of the system, segment configuration and mileage. Risk scores from the 2023-2025 WMP used WiNGS 3.0 model version and risk scores from the 2022 WMP correlate to WiNGS 1.0 model version. Each risk score field is suffixed with its corresponding model version for clarity. A column header with the requested attributes is provided above the SDG&E report’s column headers to help correlate the results to the original request.

While the risk scores for both model versions have been provided, direct comparison of these risk scores cannot be done effectively due to changing risk in the territory, system configuration changes, and updates between versions. Each model version contains several enhancements to improve risk quantification which adjust the risk scores. The models should be viewed as independent of each other with separate temporal and logical constraints.

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QUESTION 4

Provide a geodatabase file containing the outputs from your current wildfire risk model (i.e., the model you are using for your 2023-2025 WMP filing), at the circuit-segment level. (This data should be equivalent to the previous question, but in GIS format.)

Please provide, as line features, the most recent spatial data for all circuit segments for which your current risk model calculates circuit segment-level expected risk (i.e., probability of ignition multiplied by the consequence of ignition). Include the following attributes for each circuit segment:

- a) Items (a) through (c) of the previous question
- b) Items (p) through (s) of the previous question.

RESPONSE 4

SDG&E objects to the request on the grounds set forth in General Objections, 2, 5, and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Please see “WMP_DR_CA_05_Q4.gdb.7z.”

The attached zipped gdb file is encrypted according to SDG&E’s GIS electric data policy. The cypher for this gdb is WmPwMpWMPwmp1!

This gdb contains records from question 3 joined to the segments in the wings_circuit_segment feature class. A single record in the table from question 3 will typically join to two records in the feature class because the feature class contains two records per segment, one for overhead and one for underground.

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Asset inspections and maintenance:

QUESTION 5

Please fill out the attached spreadsheet, *CalAdvocates-SDGE-2023WMP 05_Attachment, Tab 1*, requesting information regarding your asset inspections in 2022.

RESPONSE 5

Please see “CalAdvocates-SDGE-2023WMP-05_Q5.xlsx”

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QUESTION 6

Please augment Table 13 of the non-spatial data tables in your WMP Quarterly Data Report for Q4 of 2022, which reports asset-related corrective notifications on electric circuits that were open at the end of the quarter. Add the following information in separate columns:

- a) Name of the associated circuit
- b) ID number of the associated circuit
- c) Geographic latitude in decimal degrees, truncated to seven decimal places
- d) Geographic longitude in decimal degrees, truncated to seven decimal places
- e) Object/damage code or other internal SDG&E description of defect.

RESPONSE 6

SDG&E objects to the request on the grounds set forth in General Objections, 2, 5, and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Additional columns were added in the file “ Copy of Table 13 Q4 2022 QDR Submission_Q6.xlsx” and can be found in the orange columns “M-Q.”

It should be noted that circuit information on structures that are not associated to a primary distribution circuit are shown as “N/A”. Where circuit name is “Stub Pole” the corresponding structure does not have an associated circuit. Additionally, the locations (latitude and longitude) of assets that are 230 kV or above are not included due to confidentiality.

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QUESTION 7

Regarding Table 13 of the non-spatial data tables in your WMP Quarterly Data Report for Q4 of 2022:

- a) In column “f. Due date of the original work order,” there are four rows with a due date of “#”. Please explain what this means or correct those entries.
- b) In column “f. Due date of the original work order,” the majority of the rows list the due date as “N/A.” Please explain why these work orders have no due date.
- c) In column “g. GO 95 rule 18 priority level of the original work order,” the majority of the rows list the priority level as “N/A.” Please explain why these work orders have no priority level.
- d) Does SDG&E have an internal system of priority levels for corrective notifications that differs from the system of priority levels specified in GO 95 Rule 18?
- e) If the answer to part (d) is yes, please explain SDG&E’s internal priority system.
- f) Does SDG&E ever re-inspect corrective notifications before they are resolved?
- g) If the answer to part (f) is yes, under what circumstances does SDG&E conduct re- inspections?

RESPONSE 7

SDG&E objects to the request on the grounds set forth in General Objections, 2, 5, and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a) Three of the four entries were inadvertently included in Table 13. Work order numbers 101797, 126966, and 90774 are work orders assigned to third party communications infrastructure providers to perform corrective work and are not work orders for which SDG&E is responsible. The fourth work order, 129910, was also inadvertently included at the time of reporting due to timing of the business process. The order was in the process of being evaluated to assign a due date, and thus should not have been included in Table 13. Table 13 will be amended to exclude these four work orders and will be submitted to Energy Safety per revision guidelines.
- b) The 8,581 work orders with “N/A” as the due date of the original work order are work orders that resulted from drone inspections. Because drone inspections are supplemental inspections to routine detailed and patrol inspections mandated under GO 165 and part of

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our auditable corrective maintenance program, there is no mandatory due date associated. However, SDG&E evaluates drone inspection findings, generates corrective work orders, and prioritizes the work with the remaining backlog of corrective work.

- c) The 8,581 work orders with N/A as the GO 95 rule 18 priority level are work orders that resulted from drone inspections. Because drone inspections are supplemental inspections to routine detailed and patrol inspections mandated under GO 165 and part of our auditable corrective maintenance program, there is no associated GO 95 rule 18 priority level. However, SDG&E evaluates drone inspection findings, generates corrective work orders, and prioritizes the work with the remaining backlog of corrective work.
- d) Yes, SDG&E utilizes internal severity levels for distribution drone inspections. Work orders resulting from distribution drone inspections are prioritized based on severity using the following designations at the time of inspection: Emergency, Priority, and Non-Critical. Emergency work orders are completed immediately (typically within 1-3 days) and Priority work orders are prioritized over Non-Critical work orders during both engineering/design and construction phases.
- e) Yes.
- f) Work orders resulting from routine inspections are subject to a deferral approval process with management personnel if warranted under reasonable circumstances. Each deferral request is reviewed, and various factors are considered prior to approval, such as the reason for the delay and any potential safety concerns including anticipated weather conditions and current condition of the underlying issue. As part of that review, the issue may be re-assessed for safety to ensure the priority level of the corrective work remains appropriately assigned since the issue was first identified. In addition, SDG&E performs pre-event patrols and may review the condition of facilities associated with open work orders prior to and after certain weather events. Again, this is dependent on the type of work order and whether that work order is associated with a condition (e.g. crossarm damage versus missing signage) that could pose a safety risk.

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END OF REQUEST