

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

Date Received: February 10, 2023

Date Submitted: March 29, 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.

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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.

Vegetation Management (VM)

QUESTION 1

Provide your workplan that describes where you will undertake EVM projects in 2023. This workplan should be in an Excel format, with circuit-segments as rows. Please include the following information in separate columns in the Excel spreadsheet at a minimum:

- a) Circuit name
- b) Circuit ID number
- c) Circuit-segment name
- d) Circuit-segment ID number
- e) EVM miles to be completed in 2023
- f) Risk ranking of the circuit-segment.

OBJECTION

SDG&E objects to this request on the grounds set forth in General Objection No. 9. Subject to the foregoing objection, SDG&E responds as follows.

RESPONSE 1

SDG&E does not annually forecast where specific EVM projects will occur. The pre-inspection and tree trim activities follow an annual master schedule based on the Vegetation Management Area (VMA). The exact locations where EVM tree trim clearances will be performed are unknown until after the pre-inspection activity occurs and the trimming is completed. The tree trimmer determines which trees will require greater clearances based on multiple criteria including species, growth rate, tree health, and proper pruning practices.

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QUESTION 2

Provide your workplan that describes where you will undertake EVM projects in 2024. This workplan should be in an Excel format, with circuit-segments as rows. Please include the following information in separate columns in the Excel spreadsheet at a minimum:.

- a) Circuit name
- b) Circuit ID number
- c) Circuit-segment name
- d) Circuit-segment ID number
- e) EVM miles to be completed in 2024
- f) Risk ranking of the circuit-segment.

RESPONSE 2

Please see response to Question 1.

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QUESTION 3

Please provide a list of any incidents in 2022 where the actions of a VM contractor posed a safety risk to workers and/or the public. “Safety risk” here is defined as any occurrence on a worksite where the contractor’s actions created a safety hazard for either workers or the general public.

For each instance, please provide:

- a) The date you were informed of the safety issue
- b) The date that the original work that created the safety issue was performed
- c) Whether the safety issue concerned a transmission or distribution circuit
- d) The vegetation management initiative involved in the original work
- e) A brief description of the safety issue involved.

OBJECTION

SDG&E objects to this request on the grounds set forth in General Objection No. 9. Subject to the foregoing objection, SDG&E responds as follows.

RESPONSE 3

Please see attachment titled, “SDGEResponse_CalAdvocates_DR-06.xlsx” at the tab for response 3.

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System Hardening:

QUESTION 4

Provide your workplan that describes where and when you will perform system hardening on distribution circuits in 2023. For projects that you expect to partially complete in 2023 (i.e., projects that started before 2023 and are expected to continue in 2023, or projects that are expected to be completed after 2023), please include the project and report the work what you forecast will actually be performed in calendar year 2023.

For each project, include the following information in separate columns, at a minimum:

- a) Order number
- b) Program
- c) Circuit ID number
- d) Circuit-segment name or ID number (if the project affects more than one circuit-segment, please identify each one)
- e) Relevant wildfire risk score(s) from the wildfire risk model that you are using to estimate distribution risk in your 2023-2025 WMP filing
- f) The expected or actual start date of the project
- g) The expected completion date of the project
- h) Length (in circuit miles) of covered conductor to be installed in 2023
- i) Length (in circuit miles) of underground conductor to be installed in 2023
- j) Length (in circuit miles) of overhead conductor to be permanently removed in 2023 and replaced by underground conductor (note that this may differ slightly from the previous item due to differing overhead and underground routes)
- k) Length (in circuit miles) of overhead conductor to be permanently removed in 2023 and *not replaced* with covered conductor or undergrounded)
- l) Length (in circuit miles) of any bare-wire overhead system hardening project to be installed in 2023 (if this is greater than zero, please describe the type of system hardening project)
- m) Length (in circuit miles) of any other type of system hardening project to be installed in 2023 (if this is greater than zero, please describe the type of system hardening project).

OBJECTION

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SDG&E objects to this request on the grounds set forth in General Objection No. 9. Subject to the foregoing objection, SDG&E responds as follows.

RESPONSE 4

Please see attachment titled, "SDGEResponse_CalAdvocates_DR-06.xlsx" at the tab for response 4.

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QUESTION 5

Provide your workplan that describes where and when you will perform system hardening on distribution circuits in 2024. For projects that you expect to partially complete in 2024 (i.e., projects that are expected to start before 2024 and are expected to continue in 2024, or projects that are expected to be completed after 2024), please include the project and report the work that you forecast will actually be performed in calendar year 2024.

For each project, include the following information in separate columns, at a minimum:

- a) Order number
- b) Program
- c) Circuit ID number
- d) Circuit-segment name or ID number (if the project affects more than one circuit-segment, please identify each one)
- e) Relevant wildfire risk score(s) from the wildfire risk model that you are using to estimate distribution risk in your 2023-2025 WMP filing
- f) The expected or actual start date of the project
- g) The expected completion date of the project.
- h) Length (in circuit miles) of covered conductor to be installed in 2024
- i) Length (in circuit miles) of underground conductor to be installed in 2024
- j) Length (in circuit miles) of overhead conductor to be permanently removed in 2024 and replaced by underground conductor (note that this may differ slightly from the previous item due to differing overhead and underground routes)
- k) Length (in circuit miles) of overhead conductor to be permanently removed in 2024 and *not replaced* with covered conductor or undergrounded)
- l) Length (in circuit miles) of any bare-wire overhead system hardening project to be installed in 2024 (if this is greater than zero, please describe the type of system hardening project)
- m) Length (in circuit miles) of any other type of system hardening project to be installed in 2024 (if this is greater than zero, please describe the type of system hardening project).

OBJECTION

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RESPONSE 5

Please see attachment titled, “SDGEResponse_CalAdvocates_DR-06.xlsx” at the tab for response 5.

QUESTION 6

For each of your 2023-2025 WMP system hardening initiatives, please provide disaggregated information related to expenditures and circuit miles treated in the attached table, *CalAdvocates-SDGE-2023WMP-06 Attachment, Tab 1*. Add columns as needed.

OBJECTION

SDG&E objects to this request on the grounds set forth in General Objection No. 9. Subject to the foregoing objection, SDG&E responds as follows.

RESPONSE 6

Relocation of Overhead to Underground (refer to cost break-out for WMP.473 of Table 11 submitted to OEIS and Table 8-3 of 2023 WMP Filing) – The combined expenditures for both Capital and Operating expense for the 2022-2024 timeframe are as follows: \$126.9M for 2022 (\$126.7M capital, \$0.2M Opex), \$196.6M for 2023 (\$196.2M Capital, \$0.4M Opex), and \$295M for 2024 (\$292M Capital, \$3M Opex). These expenditures will support the completion of 65 miles in 2022, 84 miles in 2023, and 125 miles in 2024.

Covered Conductor (refer to cost break-out for WMP.455 of Table 11 submitted to OEIS and Table 8-3 of 2023 WMP Filing) – The combined expenditures for both Capital and Operating expense for the 2022-2024 timeframe are as follows: \$93M for 2022 (\$90M capital, \$3M Opex), \$79M for 2023 (\$76.8M Capital, \$2.2M Opex), and \$59.8M for 2024 (\$59.2M Capital, \$0.6M Opex). These expenditures will support the completion of 63 miles for the 2022 and 60 miles each for the 2023-2024 timeframe.

Traditional Hardening (refer to cost break-out for WMP.475 of Table 11 submitted to OEIS and Table 8-3 of 2023 WMP Filing) – The combined expenditures for both Capital and Operating expense for the 2022-2024 timeframe are as follows: \$26.5M for 2022 (\$23.3M capital, \$3.2M Opex), \$3.8M for 2023 (\$2M Capital, \$1.8M Opex), and \$0.9M for 2024 (\$0.8M Capital, \$0.1M Opex). These expenditures will support the completion of 27 miles in 2022, and 2 miles in 2023.

Distribution Underbuild (refer to cost break-out for WMP.545 of Table 11 submitted to OEIS and Table 8-3 of 2023 WMP Filing) – This initiative is capital only. The total expenditures for

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the 2022-2024 timeframe are as follows: \$3.2M for 2022, \$11.4M for 2023, and \$14.8M for 2024. These expenditures will support the completion of 0.6 miles in 2022, 7 miles in 2023, and 1 mile in 2024.

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QUESTION 7

Please provide a spreadsheet listing (as rows) each undergrounding project completed during the period of January 1, 2022, through December 31, 2022. For each project, please provide the following information (as columns):

- a) Project ID number or other identifier
- b) Circuit ID
- c) ID of each circuit segment that was entirely undergrounded in the project
- d) ID of each circuit segment that was partially undergrounded in the project
- e) County or counties where undergrounding took place
- f) Project start date
- g) Project completion date
- h) Total circuit-miles undergrounded
- i) Total miles of trenching required
- j) Total life-cycle electric costs⁵ of the project (i.e., costs attributed to your electric facilities), including costs for planning, design, permitting, and construction
- k) Total life-cycle costs of the project, including costs attributed to non-electric utilities, including costs for planning, design, permitting, and construction
- l) Whether this was a Rule 20 project (yes/no)
- m) Whether this was a WMP project (yes/no)
- n) Whether this was a post-wildfire rebuild project (yes/no)
- o) Whether you shared trenches for this project with any telecommunications utilities (yes/no)
- p) Whether you shared trenches for this project with gas facilities (yes/no).

OBJECTION

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RESPONSE 7

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QUESTION 8

Please provide a geodatabase file with a polyline feature for each undergrounding project completed during the period of January 1, 2022 through December 31, 2022. In addition to the spatial location, please provide the following attributes for each project:

- a) Project ID number or other identifier, matching part (a) of the previous question
- b) Circuit ID
- c) Project completion date

OBJECTION

SDG&E objects to this request on the grounds set forth in General Objection No. 9. Subject to the foregoing objection, SDG&E responds as follows.

RESPONSE 8

Please see “CalPA_DR06_Question7.zip.”

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Ignitions

QUESTION 9

Identify any ignitions in 2022 associated with assets where you had an existing corrective notification at the time of the ignition. Please provide a spreadsheet listing each such ignition (as rows) with the following information in separate columns:

- a) Unique ignition ID
- b) Date of ignition
- c) Cause of ignition
- d) Type of asset associated with the ignition
- e) Acres burned
- f) Number of structures burned, if any
- g) Number of injuries associated with ignition, if any
- h) Asset ID of asset associated with ignition
- i) Circuit ID number of circuit associated with ignition
- j) Notification number(s) for the existing maintenance tag on the asset in question.

OBJECTION

SDG&E objects to this request on the grounds set forth in General Objection No. 9. Subject to the foregoing objection, SDG&E responds as follows.

RESPONSE 9

SDG&E did not experience any ignitions in 2022 associated with assets with an existing corrective notification at the time of ignition.

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Public Safety Power Shutoffs (PSPS):

QUESTION 10

Regarding your PSPS circuit modeling capabilities:

- a) Please describe your present circuit modeling capabilities with regard to PSPS decision-making (“PSPS circuit modeling capabilities”), including with what level of granularity they are able to determine how circuit hardening efforts or other changes to a line segment will affect PSPS thresholds.
- b) Please describe any improvements to the present PSPS circuit modeling capabilities that you expect to implement in 2023.
- c) Please describe any improvements to the present PSPS circuit modeling capabilities that you expect to implement in 2024.
- d) Please describe the expected state of your PSPS circuit modeling capabilities at the conclusion of the 2023-2025 WMP cycle.

RESPONSE 10

a) For the WiNGS-Planning Model, the PSPS risk is calculated at the segment level and is influenced by the maximum upstream segment PSPS probability. Mitigations that occur upstream of segments will also influence the risk of PSPS on downstream segments. Thus, the PSPS impact on a segment cannot be viewed in isolation and must be considered in the context of the electric network (other segments on the same circuit with their respective mitigations). When a segment is fully undergrounded back to the substation, the model would consider the risk of PSPS to be removed. When a segment is mitigated with covered conductor, we consider the PSPS threshold to be reduced based on associated wind alert speed updates.

For WiNGS-Ops, models are developed at the segment level and take as inputs the circuit characteristics at the time that the model is run, which can be as granular as daily. Therefore, circuit hardening or other changes to a line segment, once recorded in SDG&E’s analytical data warehouses, are immediately reflected in WiNGS-Ops model outputs, which influences the decision to de-energize. Segments that have been hardened will show a lower quantified risk score, thereby lowering PSPS thresholds.

b) The following updates are expected in 2023 for WiNGS-Planning:

The current PSPS likelihood assessment is relatively new and is expected to be revamped in the current WMP cycle. Future enhancements already identified will include how weather conditions and ignition risk affect the annual likelihood of implementing PSPS. Although in the WiNGS-Planning Model the PSPS consequence

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assessment considers type of customers, it can be improved with further development of social vulnerability or availability of redundant back-up power systems that could reduce the impacts of a PSPS.

The following updates are expected in 2023 for WiNGS-Ops :

- Create PSPS scenarios with different event durations.
- Revisit Subject Matter Expert AFN customer scaling factors in the Safety component.
- Revisit Safety assumption of fatalities per customer minutes de-energized.
- Review and update existing Financial assumptions.
- Review and update existing Reliability assumptions.

c) The following updates are expected in 2024 for WiNGS-Planning:

- SDG&E will develop a model to estimate PSPS duration for all customer segments.
- SDGE& will develop an egress model to capture PSPS hazard and exposure potential
- SDG&E will incorporate community vulnerability into its models
- SDGE& will incorporate an economic impact measurement into its model to capture PSPS hazard and exposure potential

The following updates are expected in 2024 for WiNGS-Ops:

- Revisit Subject Matter Expert AFN customer scaling factors in the Safety component.
- Revisit Safety assumption of fatalities per customer minutes de-energized.
- Review and update existing Financial assumptions.
- Review and update existing Reliability assumptions. If ICE 2.0 model results are available and considered appropriate, update PSPS model assumptions with ICE 2.0 model estimates

d) SDG&E plans to explore and evaluate the addition of missing model factors based on the assessment of data and resource availability as well as incremental value added. In the 2023 to 2025 WMP cycle, factors will be integrated where data is available and resources will be engaged to incorporate those factors into the models. Factors to be evaluated include PSPS likelihood and wildfire and PSPS consequence. Factors such as social vulnerability and the potential impact of long-term-duration fires will be evaluated to see if PSPS likelihood, and PSPS consequence can be improved. SDG&E also plans to identify opportunities for additional factors and initiate data gathering in the current WMP cycle to work towards integrating those

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factors in future WMP cycles. This will be a continuous process of evaluating what can be integrated meaningfully and what may need to be considered in future years to enhance quality and quantity of data over time. Where possible, proxies may be leveraged, and assumptions will be tracked and documented to fulfill the requirements.

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END OF REQUEST