

**PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2023WMP-08
SDG&E RESPONSE**

**Date Received: April 5, 2023
Date Submitted: April 13, 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, unless indicated otherwise.

Vegetation Management (VM)

QUESTION 1

SDG&E states on p. 268 of its 2023 WMP that a change to its off-cycle inspection activity within the next five years is to “Continue to research and modify off-cycle HFTD schedule were necessary to optimize risk reduction” (*sic*).

- a) What are SDG&E’s research needs in regards to the above?
- b) How does SDG&E intend to conduct the abovementioned research?
- c) What data sources or experiments does SDG&E intend to use to support the abovementioned research?
- d) What modifications does SDG&E anticipate making to the off-cycle HFTD schedule? Please describe any such changes.

RESPONSE 1

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 3, 5 and 9. Further, the request calls for speculation. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

a) The original off-cycle inspection schedule was based on the annual, pre-inspection schedule activity to allow a period of time to elapse between the activities. This off-cycle inspection was scheduled as a mid-cycle activity. The mid-cycle activity was a second annual inspection that occurred 6-months after the routine scheduled activity. To explore the use of a risk-informed approach to prioritize the VMAs within the HFTD, SDG&E partnered with *Logic20/20* to develop a predictive model and explore potential model applicaitons.

The first iteration of the model was completed by the end of 2022. This first iteration only includes data variables collected during vegetation management operational activities, such as tree trimming frequency and clearance. SDG&E will continue to explore the benefit of adding additional variables to the model to improve the performance and provide applicable data points.

b) SDG&E partners with a third-party company, *Logic20/20*, who has been developing a machine learning approach to model and predict risk over time, while also assisting in model enhancement research and documentation development.

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c) SDG&E intends to leverage and test both internal and external data sources to (1) enhance the prediction capabilities of the model and (2) assist with operational decision making in the field. Internal data sources to be tested include vegetation activity records. External data sources to be assessed include the Weather and Research Forecasting (WRF) model. In addition to new weather variables, SDG&E is also exploring satellite imagery and other publicly available data sources to identify vegetation and terrain features. This includes assessing digital elevation models (DEMs) derived from the Shuttle Radar Topography Mission (SRTM) to produce topographic variables such as elevation, slope degree, and slope aspect.

d) SDG&E has begun adopting the new eight-month off-cycle activity schedule resulting from the initial model developed by *Logic 20/20* and will continue to refine where modifications may be warranted.

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QUESTION 2

SDG&E states on p. 268 of its 2023 WMP that a change to its off-cycle inspection activity within the next five years is to “Identify proper resource need and allocation to perform the off-cycle HFTD inspection timely and efficiently.”

- a) Why has SDG&E not already accomplished the abovementioned identification of proper resource need and allocation, given that the off-cycle HFTD inspection program is already in place?
- b) Please identify SDG&E's current progress to date on identifying the proper resource need and allocation to perform the off-cycle HFTD inspection timely and efficiently.
- c) Please identify what SDG&E needs to do in order to identify the abovementioned resource need and allocation.
- d) Please provide the number of SDG&E's off-cycle HFTD inspections that were completed on time in 2022 and the total number of off-cycle HFTD inspections.
- e) Were SDG&E's off-cycle HFTD inspections completed timely in 2022?

RESPONSE 2

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 3, 5 and 9. Further, the request mischaracterizes SDG&E's statements in its WMP. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a) The statement in Question 2a inaccurately characterizes SDG&E's off-cycle inspection activity program. SDG&E was able to accomplish the resource needs based on the original mid-cycle pre-inspection VMA schedule. However, a compressed timeframe to complete the patrols in the entire HFTD before September 1 poses challenges. The new off-cycle patrol is an 8-month schedule based on the findings from the *Logic2/020* model and will require resource allocation adjustments.
- b) The SDG&E WMP Lead Forester is responsible for creating the off-cycle VMA schedule and assigning the VMAs to the respective contractors and internal SDG&E Patrollers. The Lead Forester also works with the contractors to determine the required number of resources needed to complete the off-cycle patrols for each VMA each month.
- c) See b) above.
- d) All 105 (VMA) off-cycle HFTD inspection activities were completed on time in 2022.

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e) Yes. See Response to subpart d above.

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QUESTION 3

SDG&E states on p. 268 of its 2023 WMP that a change to its off-cycle inspection activity within the next five years is to “Identify additional and proactive HFTD inspection activity opportunities such as pre-PSPS and adverse weather condition and event patrols.”

- a) Please describe how SDG&E intends to identify the abovementioned opportunities.
- b) What does a pre-PSPS inspection, referenced above, entail?
- c) What do “adverse weather condition and event patrols” referenced above entail?
- d) How will SDG&E assess the effectiveness of “additional and proactive HFTD inspection activity opportunities” referenced above?
- e) At what threshold of effectiveness would SDG&E propose the abovementioned opportunities as permanent programs or WMP initiatives?

RESPONSE 3

- a) In addition to off-cycle inspection activities, these opportunities will be identified as conditions occur via scheduled PSPS events, declared Red Flag Warnings from the National Weather Service, and Meteorology weather forecasts for advancing storms.
- b) A pre-PSPS inspection could entail a targeted field patrol of circuit segments scheduled to be de-energized in advance of the event to identify any hazardous tree conditions.
- c) Adverse weather conditions may include storms, Santa Ana Wind event, declared Red Flag Warning, and event patrols could entail a field assessment in targeted areas of the HFTD in advance of the event in order to prevent a tree/power line conflict.
- d) While the effectiveness may not be specifically quantifiable, it is presumed that these activities would mitigate observable risks.
- e) SDG&E anticipates that these additional activities will remain ad-hoc as conditions occur.

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QUESTION 4

SDG&E states on p. 268 of its 2023 WMP that a change to its off-cycle inspection activity within the next five years is to “Further integrate and operationalize risk and condition-based data such as meteorology and environmental conditions into ground-level decision-making.”

- a) Please describe how SDG&E intends to accomplish the abovementioned integration and operationalization.
- b) How will the process described in your answer to subpart (a) improve ground-level decision-making regarding off-cycle inspections?

RESPONSE 4

- a) The partnership with *Logic20/20* allows SDG&E to evaluate and operationalize the application of the predictive model. The model is trained using logistical regression methods. Features that are informational to inspection activities are identified by vegetation management. They will be aggregated at VMA or segment level. One of the applications identified in 2023 is to support the detailed inspection activities by displaying the key features trained in the model in Epoch. Such data variables would serve as a situational awareness tool to help inspectors to make informed decisions on the follow-up work.
- b) SDG&E plans to further test this first model and display selected variables for filed users in Epoch. These data variables include frequency of hazard trees, memos, and outages, as well as wind gusts and other environmental data points. These data points generated from the predictive model could be used to inform the prioritization of the hazard and memo trees during routine inspections where applicable.

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QUESTION 5

SDG&E states on p. 269 of its 2023 WMP that “SDG&E sponsored a third-party study of its Fuels Treatment activities in 2022 to review the efficacy of the program and potential risk reduction.”

- a) What were the findings of the abovementioned study?
- b) Please identify who performed the abovementioned study.
- c) How has SDG&E integrated the findings of the abovementioned study into its planned fuels treatment activities for 2023-2025?
- d) Please provide any documents that were generated from the abovementioned study (e.g. reports, workpapers, etc.).

RESPONSE 5

- a) Please see report provided in SDG&E’s 2023-2025 Wildfire Mitigate Plan titled “WMS Work Summary” beginning on page 942.
- b) The study was conducted by *Insight Global*.
- c) This was the first study for SDG&E to assess the methodology and efficacy of the fuels management program of using 50 feet vegetation thinning radius as the basis of the activity. SDG&E has a small number of ignitions per year. Additionally, the accuracy of the ignition location prior to the initial WMP cycle does not support spatial analysis, resulting in limited data sample. Although this study does provide a statistical methodology for further analysis, as of now, SDG&E does not find any results that can be operationalized to its fuels treatment activities.
- d) Please see a) above.

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QUESTION 6

SDG&E states on p. 269 of its 2023 WMP that an enhancement to its fuels treatment activity in 2023 will be to “Continue to assess cost/benefit and research alternatives such as fire retardants.”

- a) How does SDG&E intend to accomplish the abovementioned assessment and research?
- b) Please describe SDG&E’s progress to date regarding assessing cost/benefit of its fuels treatment program.
- c) Please describe SDG&E’s progress to date on the abovementioned research of alternatives.

RESPONSE 6

- a) SDG&E has a current plan to perform an assessment of the unit cost of mechanical thinning compared with alternate options such as fire retardant and goat grazing. It further plans to include a comparison of the unit cost per in the preliminary planning phase to collaborate/fund a fire retardant project with San Diego County Fire in 2023. SDG&E is also planning to explore additional use of goat grazing as supplemental activity for fuels management.
- b) SDG&E plans to assess the alternate option of goat grazing by end of the second quarter of 2023, and the alternate option of fire retardant by end of quarter 3. Once data points are available, a cost/benefit assessment will be conducted.
- c) This research will be considered in the future.

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QUESTION 7

SDG&E states on p. 269 of its 2023 WMP that an enhancement to its fuels treatment activity in 2023 will be to “Engage third party to study the methodology and effectiveness of the fuels treatment activity.”

- a) Will the abovementioned third party study be a continuation of the third party study referred to in Question 5, or a new study?
- b) If your answer to subpart (a) is “a new study,” please identify how the scope of work of the new study will be different from the previous study referenced in Question 5, and how it will add to the findings from the previous study.
- c) If your answer to subpart (a) is “a continuation of the third party study referred to in Question 5,” please identify how SDG&E’s continuation of that study will add to its findings and improve SDG&E’s fuels treatment program.

RESPONSE 7

- a) The initial study on the effectiveness is referred to in Question 5. SDG&E is looking into new approaches to further conduct the study in 2023.
- b) N/A
- c) This new approach may consider leveraging satellite imagery data for effectiveness research purpose, as well as efficiency in identifying the target poles for fuel treatment.

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QUESTION 8

SDG&E states on p. 280 of its 2023 WMP that a change to its Vegetation Management Enterprise System since its last WMP is to add “New mapping capabilities to electronically track and document inspection progression”

- a) Please list and describe the abovementioned new mapping capabilities.
- b) How are the abovementioned new mapping capabilities currently improving SDG&E’s inspection programs?
- c) Does SDG&E intend to add mapping capabilities beyond what it has already?
- d) If your answer to subpart (c) is “yes,” please list and describe the planned future enhancements.

RESPONSE 8

- a) SDG&E developed and implemented a new work order progression tool in both the server side and field application of the PowerWorkz work management system.
- b) This new tool allows the desktop and field user the capability to visualize the progression of the inspection activity via map interface. This will increase efficiency and work production.
- c) Yes.
- d) SDG&E anticipates adding this same work progression tool as needed for other vegetation management activities.

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QUESTION 9

SDG&E states on p. 280 of its 2023 WMP that a change to its Vegetation Management Enterprise System since its last WMP is to add “New data fields to electronically record customer refusals and other deferred work which negates the need for hard copy forms” and the “creation of a refusal/deferred work dashboard to track and manage time-sensitive tree work.”

- a) Please list and describe the abovementioned new data fields.
- b) How are the abovementioned new data fields improving SDG&E’s ability to respond to customer refusals and complete deferred work?

RESPONSE 9

- a) The new electronic data fields include category, reason for refusal/exception, type of contact, contractor, and comments. These new data fields are in addition to all the other information captured within the tree record, and provide a synopsis of the deferred work including why a customer is refusing trimming, why a tree cannot be trimmed on the routine cycle, the method of communication with the customer, date of the communication, and the ability to free-hand additional comments related to the location.
- b) This new electronic data capture helps streamline the deferred work process by eliminating the need for hard-copy documentation and filing, provides standardization and consistency of information, and facilitates reporting and follow-up efforts.

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QUESTION 10

SDG&E states on p. 281 of its 2023 WMP regarding its QA/QC, “A higher sampling percentage is used for some enhanced vegetation management activities in the HFTD, including a 100 percent post-trim audit of all completed trim and removal work generated from the off-cycle HFTD inspection activities.”

- a) Is the abovementioned 100% post-trim audit conducted for *all* trim and removal activities in the HFTD, or just those that result from an off-cycle inspection?
- b) If the answer to subpart (a) is the latter, please explain why SDG&E does not audit 100% of all trim and removal work in the HFTD.

RESPONSE 10

- a) The 100% post-trim audit is limited to all trim and removal activities that result from the *off-cycle* (mid-cycle) HFTD inspection activities.
- b) The number of trees generated from the off-cycle HFTD inspection activity is relatively low. Therefore, a 100% audit of all trees is feasible and manageable without impacting audit resources or the activity schedule. Auditing all trim and removal activities in the HFTD would include tens of thousands of trees, necessitating significant additional workload and associated costs.

SDG&E uses a 15% random rate as the baseline for auditing all other vegetation management activities because it believes this is an acceptable and representative sample of the population of completed work to reflect contractor performance. Vegetation management audit results do not yield a high percentage of fail rates that may otherwise inform of the need for a higher sample percentage rate, therefore, a 15% sample is used. Increasing audit sample size for all activities could require an increase in the number of audit resources at additional rate-payer expense and with limited incremental value and justification.

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QUESTION 11

SDG&E states on p. 282 of its 2023 WMP:

A 100-percent audit of all completed tree trimming and removal work generated during the off-cycle, HFTD patrol activity was performed where feasible. SDG&E is considering the development of compliance-based audits as a measure of system status and reliability. Such audits may be performed across multiple VMAs and create benchmarking for the performance of vegetation management operations.

- a) Please identify where the abovementioned 100 percent audit has not been feasible.
- b) How has SDG&E overcome, or how does SDG&E plan to overcome (as applicable), roadblocks to attaining the 100 percent audit of all completed tree trimming and removal work generated during the off-cycle HFTD patrol activity?
- c) Please describe the scope, goals, methodology, and benchmarks of the abovementioned compliance-based audits.
- d) What statute(s) or General Order(s) would SDG&E's compliance-based audits referenced above be complying with?
- e) How will SDG&E determine which VMAs to conduct the abovementioned compliance-based audits in?
- f) Please describe the benchmarking SDG&E intends to develop and perform for vegetation management operations performance.

RESPONSE 11

- a) Audits are performed by Vegetation Management Area (VMA). Instances where a 100% audit has not been feasible in an individual VMA include where there is an inability to physically reach a tree due to an access constraint, or an ongoing customer refusal.
- b) Instances of a less than 100% audit are infrequent and do not result in a significant impact to the overall results of an audit. SDG&E does have a process to track and follow-up with audit trees that are customer refusals.
- c) As stated in the quoted language above, SD&GE is considering this approach and has not yet begun the development of a compliance-based audit and the specific methodology.
- d) General Order 95, Rule 35, Public Resources Code 4292, and Public Resources Code 4293

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e) SD&GE has not yet begun the development of a compliance-based audit and the specific methodology. One option may be a randomized sample of VMAs located within a specific SDG&E Operations & Maintenance District.

f) See c) above.

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QUESTION 12

SDG&E states on p. 252 of its 2023 WMP, “Contractors are required to provide the necessary training to their workforce on the technical capabilities to perform the work.”

- a) Please identify what necessary training is required for contractors to perform SDG&E’s vegetation management work.
- b) Does SDG&E inform VM contractors what training is necessary to perform SDG&E’s VM work?
- c) Does SDG&E review the training or certifications that its contractors provide to their workforces?
- d) Does SDG&E verify that contractors’ workforces are properly trained to perform SDG&E’s vegetation management work?
- e) Please describe SDG&E’s process, if any, that is currently in place to review contractor workforce qualifications and/or ability to perform SDG&E’s VM work?

RESPONSE 12

- a) For tree trimming, the necessary training includes electrical and safety awareness, proper use of equipment, and proper pruning practices. For pre-inspection the necessary training includes electrical and safety awareness, species identification and growth characteristics, and hazard tree assessment.
- b) In addition to the abovementioned training, SDG&E requires the contractors to perform customer service, environmental, and fire preparedness training.
- c) Yes.
- d) Yes.
- e) Vegetation Management contractors are required to attain certain certifications for specific positions. SDG&E periodically reviews contractor adherence to these requirements on a periodic basis. VM contractors also provide annually the content and sign-in logs for each of the training modules SDG&E requires.

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QUESTION 13

SDG&E states on p. 266 of its 2023 WMP, “Any priority tree work identified during the off-cycle HFTD patrol is expedited as needed via the “Memo” process to mitigate the risk.”

- a) Please state how many “Memo” processes were initiated related to priority tree work identified in HFTD 2 areas during 2022.
- b) Please state how many “Memo” processes were initiated related to priority tree work identified in HFTD 3 areas during 2022.

RESPONSE 13

- a) 27 units were initiated in HFTD 2 during 2022 off-cycle inspections
- b) 60 units were initiated in HFTD 3 during 2022 off-cycle inspections

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QUESTION 14

SDG&E states on p. 266 of its 2023 WMP:

In early 2022, a third-party vendor was engaged to conduct an efficacy study of the off-cycle HFTD patrol schedule to determine the optimum schedule based on historical tree risk within each HFTD VMA... The study also considered increasing the 3-month off-cycle HFTD schedule to an 8-month schedule (January to August) and prioritizing the patrol activity for the riskiest VMAs closer to the month of September. This risk-based approach generates a machine learning model that scores trees based on descriptive features, historical growth patterns, and historical priority “Memo” trims.

- a) Please identify who conducted the abovementioned third-party study? Please provide name of individual or business and address if available.
- b) Has the above-mentioned study been completed, as of the 2023 WMP submission date?
- c) If the answer to subpart (b) is “yes,” please provide the results of the study.
- d) If the answer to subpart (b) is “yes,” please any documents generated by the study (e.g. reports, workpapers, etc.).
- e) If the answer to subpart (b) is “no,” please state when SDG&E expects the study to be complete.
- f) After the abovementioned third-party study is complete, does SDG&E plan on using the abovementioned risk-based approach and “machine learning model that scores trees” as an enhancement to its WiNGS-Planning model?
- g) Does SDG&E have additional plans to refine the abovementioned risk-based approach to improve SDG&E’s off-cycle inspections process?
- h) For this 2023-2025 WMP cycle, does SDG&E plan on continuing with an 8-month off-cycle inspection schedule?

RESPONSE 14

- a) The study was performed by *Logic 20/20*.
- b) The first iteration of this data model was completed in late 2022.
- c) See attachment “SDGE-WMP2023-08_Q.14.pdf”
- d) See attachment “SDGE-WMP2023-08_Q.14.pdf”

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e) N/A

f) No

g) Yes.

h) Yes.

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