

**PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2023WMP-09
SDG&E RESPONSE**

**Date Received: April 5, 2023
Date Submitted: April 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

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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.

Public Safety Power Shutoff (PSPS)

QUESTION 1

Regarding Appendix F, OEIS Table 9-2 (Frequently De-energized Circuits) on WMP Appendix F p. 12-17:

- a) Please clarify if Entry 9 is missing or if Table 9-2 entries were misnumbered.
- b) If there was an error in OEIS Table 9-2, please provide a corrected version.
- c) Please explain why covered conductor is not considered as a mitigation for these Frequently De-energized Circuits.

RESPONSE 1

- a) Table 9-2 was misnumbered.
- b) See attached updated Appendix F, which includes an updated Table 9-2. This update will also be included in SDG&E's non-substantive errata of the 2023-2025 Wildfire Mitigation Plan to be submitted on April 26, 2023.
- c) The Covered Conductor Program has the potential to raise the threshold for PSPS events to higher wind speeds compared to bare conductor hardening; however, as of the end of 2022 no circuits have been fully hardened with covered conductor and therefore the threshold for PSPS events has not been raised on any circuits with covered conductor installed. Based on benchmarking with other IOUs and SDG&E's testing of covered conductors, the PSPS wind speed threshold for fully covered circuit segments is expected to be set to between 55 and 60 mph. As discussed in the response to Areas for Continued Improvement SDGE-22-11 in Appendix D of the 2023-2025 Wildfire Mitigation Plan, SDG&E expects to complete covered conductor testing and finalize this threshold by December 2023.

QUESTION 2

SDG&E states on p. 418 of its 2023 WMP that, "In advance of an approaching Santa Ana Wind event, the WiNGS-Ops model is utilized as an additional data point to determine if there are areas in the service territory where the wildfire risk could outweigh the risk of PSPS."

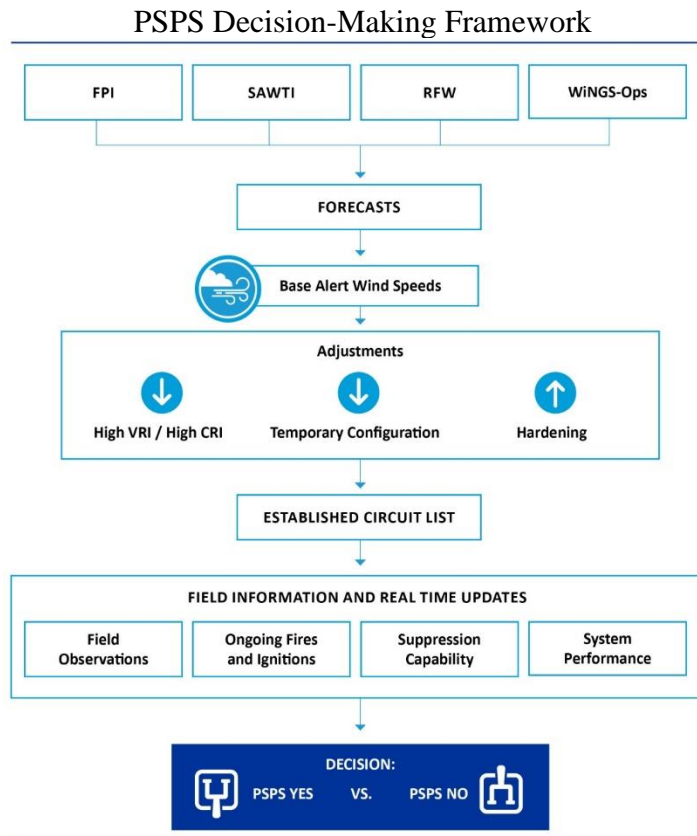
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Please list all additional “data points” that SDG&E uses, besides the WiNGS-Ops model, to determine if the wildfire risk could outweigh the risk of PSPS during an approaching Santa Ana Wind event.

RESPONSE 2

Multiple factors inform the decision to de-energize. These factors are quantified into infrastructure and environmental risk factors. Infrastructure risk includes information in the field based on unresolved damage found during inspections, active temporary construction/configuration of the electrical system that may cause equipment to have de-rated mechanical strength, and a CRI that identifies locations in the electrical system with a potential of having higher failure rates. Field environment issues may also include real-time observations from QEWs, local fire authority response and fire suppression ability at the time of an event, and wind conditions. These factors are compiled and summarized by circuit section to assist with decisions to de-energize parts of the electrical system (see PSPS Decision-Making Framework).



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Baseline alert wind speeds are used to quantify infrastructure risk into actionable criteria. They are determined separately for each device tied to a weather station and are based on a variety of factors such as wind speeds, the VRI, and the CRI. Alert wind speed thresholds are lowered if the VRI or the CRI rating is high (see PSPS Decision-Making Framework). Other factors such as maintenance issues, existing construction, other real time observations, ongoing fires and/or ignitions, suppression capabilities, and/or system protection could lower the thresholds for specific events.

Grid Operations and Procedures – Protective equipment and device settings

QUESTION 3

Regarding PSPS and its relationship to Sensitive Relay Profile (SRP) settings:

- a) Please describe in detail the decision-making process for a scenario in which SDG&E anticipates PSPS conditions but decides to use SRP settings instead.
- b) Please list all dates in 2021 and 2022 when SDG&E anticipated PSPS conditions but utilized SRP settings instead, if this occurred.
- c) Please provide a narrative of the decision-making process for any instances listed in part (b) above.
- d) Please describe how SDG&E utilizes SRP during a PSPS event period.

RESPONSE 3

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

- a) SDG&E does not use SRP instead of PSPS as these two mitigations are not treated the same or used as substitutes for one another. SDG&E will utilize SRP if PSPS de-energizations are predicted or if the FPI is Extreme. These settings are implemented only during the at-risk period, not seasonally, and only in regions impacted by extreme weather. The following bullet points summarize the conditions which would warrant SRP enablement:
 - If the FPI is Extreme in Mountain Empire and/or Ramona, Tier 3 should have Sensitive Relay Settings enabled.
 - If the FPI is Extreme in Eastern and/or Northeast, the entire HFTD (Tier 2 and Tier 3) should have Sensitive Relay Settings enabled.

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- If the FPI is Extreme in Orange County, then the HFTD in Orange County should have Sensitive Relay Settings enabled.
 - If the FPI is Extreme in any of the San Diego County coastal districts (North Coast, Beach Cities, Metro) all the Coastal Circuits with Fire Risk should have Sensitive Relay Settings enabled.
 - If any circuits are identified for potential PSPS in Mountain Empire and/or Ramona in the Tier 3 HFTD, all circuits in the Tier 3 HFTD should have Sensitive Relay Settings enabled for the predicted PSPS district(s).
 - If any circuits are identified for potential PSPS in Eastern and/or Northeast or Tier 2 in Mountain Empire and Ramona, the HFTD (Tier 2 and Tier 3) should have Sensitive Relay Settings enabled for the predicted PSPS district(s).
 - If any circuits are identified for potential PSPS in Orange County, then the HFTD in Orange County should have Sensitive Relay Settings enabled.
 - If any circuits are identified for potential PSPS that are on the Coastal Circuits with Fire Risk list, then all the Coastal Circuits with Fire Risk should have Sensitive Relay Settings enabled for the predicted district(s).
- b) As stated above, SDG&E does not use SRP instead of PSPS as these two mitigations are not treated the same or used as substitutes for one another.
- c) As stated in parts a and b, SDG&E does not use SRP instead of PSPS as these two mitigations are not treated the same or used as substitutes for one another.
- d) SRP settings are enabled when the FPI is Extreme or PSPS de-energizations are predicted. These settings are implemented only during the at-risk period, not seasonally, and only in regions impacted by extreme weather.

When SRP is enabled, SDG&E has dedicated crews staffed for restoration and readiness response. Line SCADA crews are staffed 24/7, ready to respond to collect relay event records. Once collected, the records are sent to System Protection Engineering for review, who are also on 24/7 standby whenever SRP is enabled. These records help determine proper operation and aid in determining fault location. Feedback is then provided to the operations teams for better situational awareness.

Protocols for testing/reclosing/restoration are no different between SRP and non-SRP conditions when under Extreme FPI or PSPS conditions. Automatic testing is not performed, and reclosing is disabled. A complete patrol is required, and step restore is performed for all outages.

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QUESTION 4

Regarding OneVoice communication to customers for SRP:

- a) In what circumstances does SDG&E plan to use OneVoice communication while SRP is enabled.
- b) Please list each type of situation for which SDG&E plans to use OneVoice to communicate with a customer regarding SRP.
- c) Please provide an example of the message SDG&E will send to a customer for each situation in which SDG&E uses OneVoice to communicate with a customer regarding SRP.
- d) When did SDG&E start using OneVoice to inform customers regarding SRP?
- e) At what point (i.e., or number of hours) prior to enabling SRP does SDG&E use OneVoice to notify customers?
- f) At what point (i.e., number of hours) after an SRP caused outage does SDG&E use OneVoice to notify customers?
- g) At what point (i.e., number of hours) after the line is restored does SDG&E use OneVoice to notify customers?

RESPONSE 4

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

SDG&E does not alter communications to customers when SRP is enabled. Outage response is no different for SRP outages versus non-SRP outages during an event. Outages are mapped on SDG&E's public outage website with an estimated restoration time and information on outage cause. SDG&E staffs 24/7 System Protection support to review all SRP outages in real time to provide situational awareness to our operations teams in support of faster restorations.

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Emergency Preparedness

QUESTION 5

WMP p. 375, OEIS Table 8-50 (Key Gaps and Limitations in Public Emergency Communication Strategy), states in part that “SDG&E has not been able to test notifications and messaging that were updated for the 2022 season. This messaging will be reviewed for any improvements in 2023...”

Regarding SDG&E’s notifications and messaging for emergencies:

- a) Please provide a list of the improvements or enhancements that SDG&E made for the 2022 season.
- b) Please provide a list of the improvements or enhancements that SDG&E has made for the 2023 season (since the 2022 season).
- c) Does SDG&E conduct tests on its emergency communication processes to ensure customers are being appropriately notified?
- d) If the answer to part c) above is yes, when did SDG&E most recently conduct such testing? SDG&E is creating a program to test the notification system bi-annually.
- e) If the answer to part c) above is yes, please provide the results of SDG&E’s testing on its emergency communication processes.

RESPONSE 5

- a) A number of enhancements were made in 2022 to Enterprise Notification System (ENS) to improve data consistency across reporting and dashboards specific to PSPS events. The enhanced ENS data capabilities will support improved accuracy and consistency of data reporting in the post-event reports. Enhancements include:
 - Direct sync between the PSPS Dashboard and the ENS Dashboard to ensure customer counts and device lists match;
 - ENS data directly syncs with mobile platforms such as the Public Safety Partner Portal and mobile app to indicate customers who are de-energized and re-energized;
 - Enhanced notification reporting section of the ENS dashboard that allows for pre-incident, end of day, post-incident, and ad hoc reporting data to be readily available. Access opened to other key EOC positions to encourage more self-service and wider ability to cross reference and QA/QC data for post-event and post-season reporting.

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- b) Enhancements for 2023 include Notification System Testing (NST) and streamlining data processes. Several solutions use the same data through different processes. Efforts will be made to streamline the data feeds which will lead to the eventual creation of “Enterprise Services”, a service to provide a single source of truth for data relating to PSPS de-energizations.
- c) SDG&E is creating a Notification System Testing (NST) program to test the notification system on a bi-annual basis. Pending internal approval, SDG&E anticipates testing will begin in Q2 2023.
- d) N/A - Testing has not yet been implemented.
- e) N/A - Testing has not yet been implemented.

END OF REQUEST