

**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALADVOCATES-SDGE-2025WMP-08  
SDG&E RESPONSE**

**Date Received: May 6, 2024**

**Date Submitted: May 9, 2024**

**Date Question 2 Submitted: May 14, 2024**

**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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**QUESTION 1**

For the time period from January 1, 2015 to present, please state:

- a) How many alarms SDG&E has had on fast-trip enabled protective devices;
- b) How many outages SDG&E has had on fast-trip enabled circuits;
- c) How many ignitions SDG&E has had on fast-trip enabled circuits;
- d) How many momentary outages SDG&E has had on non-fast-trip enabled circuits; and
- e) How many ignitions SDG&E has had on non-fast-trip enabled circuits.

**RESPONSE 1**

SDG&E objects to the request to the extent it is vague and ambiguous, particularly with respect to the term “alarms.” SDG&E does not use or define a fast trip “alarm,” the device either trips or does not. SDG&E further objects to the request to the extent it seeks information in a format not maintained by SDG&E and is overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Please see the table below and note that SDG&E does not define a sensitive relay profile (SRP) trip alarm. Accordingly, SDG&E’s response to item “a” is not applicable (N/A).

<b>Year</b>	<b>(a) Fast Trip Alarms</b>	<b>(b) Fast Trip Outages</b>	<b>(c) Ignitions with SRP Outages</b>	<b>(d) Momentary Outages with Non-Fast Trip Circuits</b>	<b>(e) Ignitions with Non-Fast Trip Circuits</b>
2015	N/A	1	0	249	32
2016	N/A	0	0	289	30
2017	N/A	14	0	298	23
2018	N/A	15	0	265	26
2019	N/A	14	0	274	21
2020	N/A	34	0	237	29
2021	N/A	11	0	296	25
2022	N/A	13	0	174	20
2023	N/A	5	0	147	16

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**QUESTION 2**

For the most recent 50 outages associated with a fast-trip enabled device, please provide:

- a) Protective device latitude;
- b) Protective device longitude;
- c) Circuit name;
- d) Date and time of operation;
- e) Current that tripped the protective device;
- f) Duration of current that tripped the protective device;
- g) Whether line or ground current tripped the protective device;
- h) Whether the affected circuit is 3-wire or 4-wire;
- i) Minimum to trip line current setting on device;
- j) Minimum to trip line current intentional time delay setting on device;
- k) Minimum to trip ground current setting on device;
- l) Minimum to trip ground current intentional time delay setting on device;
- m) Maximum line current from five year history;
- n) Maximum ground current from five year history;
- o) Whether or not SDG&E did a settings review after the outage; and
- p) Whether or not the fault from the outage produced an ignition.

**RESPONSE 2**

SDG&E objects to the request to the extent it is overly broad and unduly burdensome, and seeks information not relevant to SDG&E's 2025 WMP Update. SDG&E further objects to the request to the extent it calls for SDG&E to perform additional studies or analyses that do not exist, and seeks information in a manner not maintained by SDG&E. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See attached spreadsheet titled "CONFIDENTIAL\_SDG&E Response CalPA-SDGE-2025WMP-08-Q2.xlsx." A redacted version is also being provided titled "PUBLIC\_SDG&E Response CalPA-SDGE-2025WMP-08-Q2.xlsx."

Please note that:

- entries marked as "unavailable" indicate the absence of essential data required for analysis, such as relay event records, SCADA data, or email records. This designation suggests that the information needed to address specific queries is not accessible.

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- entries labeled "N/A" denote instances where SRP trips have been investigated by the system protection team and attributed to load factors. These classifications are critical for understanding the data's integrity and the operational insights they provide.

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**QUESTION 3**

For the most recent 50 outages on circuits that are 100% covered conductor:

- a) Date and time the outage started;
- b) What the determined cause of the outage was;
- c) Whether the determined cause of the outage is located at the substation;
- d) Whether the protective device that tripped the circuit off was at the substation; and
- e) Whether the fault from the outage produced an ignition.

**RESPONSE 3**

SDG&E objects to the request to the extent it seeks information not maintained or available to SDG&E, and it is overly broad and unduly burdensome. Subject to the foregoing, SDG&E responds as follows:

Not applicable. SDG&E does not have any circuits that are 100% covered conductor.

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**END OF REQUEST**