

**PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2025WMP-02
SDG&E RESPONSE**

Date Received: March 19, 2024

Date Submitted: April 5, 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.

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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.

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 2025 WMP Update submission and to work that was completed pursuant to previous years' WMPs. If a full response to a given question will be included in your 2025 WMP Update submission, your response 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.

Please note that, for this data request, the geographical regions are mutually exclusive (i.e., "Other HFTD" excludes areas that are in either Tier 2 or Tier 3). Therefore, for any given circuit, the following relationships should hold:

- Tier 2 miles + Tier 3 miles + Other HFTD miles = total HFTD miles.
- Tier 2 miles + Tier 3 miles + Other HFTD miles + non-HFTD miles = total circuit miles.

QUESTION 1

Provide an Excel table of all distribution circuits existing as of January 1, 2024 (as rows) that includes the following information in separate columns:

- a) Circuit name
- b) Circuit ID number
- c) Total circuit miles
- d) Circuit miles in Non-HFTD Areas
- e) Circuit miles in Other HFTD
- f) Circuit miles in HFTD Tier 2
- g) Circuit miles in HFTD Tier 3
- h) Circuit voltage
- i) Circuit SAIDI (System Average Interruption Duration Index) for 2023
- j) Circuit SAIFI (System Average Interruption Frequency Index) for 2023
- k) Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2023
- l) Total customer-minutes of de-energization on the circuit due to PSPS events in 2023 (sum of customer-minutes across all PSPS events).
- m) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2023
- n) Number of trees that were worked on for EVM in Non-HFTD in 2023
- o) Number of trees that were worked on for EVM in HFTD Tier 2 in 2023
- p) Number of trees that were worked on for EVM in HFTD Tier 3 in 2023
- q) Miles of covered conductor installed in Other HFTD in 2023

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- r) Miles of covered conductor installed in HFTD Tier 2 in 2023
- s) Miles of covered conductor installed in HFTD Tier 3 in 2023
- t) Number of poles replaced in Other HFTD in 2023
- u) Number of poles replaced in HFTD Tier 2 in 2023
- v) Number of poles replaced in HFTD Tier 3 in 2023
- w) Miles of underground conductor installation in Other HFTD in 2023
- x) Miles of underground conductor installation in HFTD Tier 2 in 2023
- y) Miles of underground conductor installation in HFTD Tier 3 in 2023
- z) Miles of LiDAR inspection in Other HFTD in 2023
- aa) Miles of LiDAR inspection in HFTD Tier 2 in 2023
- bb) Miles of LiDAR inspection in HFTD Tier 3 in 2023
- cc) Number of detailed ground-based inspections in Other HFTD in 2023
- dd) Number of detailed ground-based inspections in HFTD Tier 2 in 2023
- ee) Number of detailed ground-based inspections in HFTD Tier 3 in 2023
- ff) Number of detailed aerial inspections in Other HFTD in 2023 (specify units)
- gg) Number of detailed aerial inspections in HFTD Tier 2 in 2023 (specify units)
- hh) Number of detailed aerial inspections in HFTD Tier 3 in 2023 (specify units)
- ii) Number of sectionalization devices installed in Other HFTD in 2023
- jj) Number of sectionalization devices installed in HFTD Tier 2 in 2023
- kk) Number of sectionalization devices installed in HFTD Tier 3 in 2023.

RESPONSE 1

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 7. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See attached spreadsheet titled “SDGE Response CalPA-SDGE-2025WMP-DR02.xlsx.”

With respect to Question 1x and 1y, it should be noted that the geodatabase file served as a source for the data requests is built from Issue for Construction (IFC) design packages, excluding field changes made during construction. Consequently, discrepancies may arise between the mileages and dates in the geodatabase versus actual completed mileage data files. Furthermore, during the conversion of CAD files from IFC design packages to GIS files, inherent data misalignment may occur and should be acknowledged.

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QUESTION 2

Provide an Excel table of all transmission circuits existing as of January 1, 2024 (as rows) that includes the following information in separate columns:

- a) Circuit name
- b) Circuit ID number
- c) Total circuit miles
- d) Circuit miles in Non-HFTD Areas
- e) Circuit miles in Other HFTD
- f) Circuit miles in HFTD Tier 2
- g) Circuit miles in HFTD Tier 3
- h) Circuit voltage
- i) Total customer-minutes of de-energization on the circuit due to PSPS events in 2023 (sum of customer-minutes across all PSPS events).
- j) Total customer-minutes of de-energization on the circuit due to fast-trip settings in 2023.
- k) Number of support structures replaced in Non-HFTD in 2023
- l) Number of support structures replaced in HFTD Tier 2 in 2023
- m) Number of support structures replaced in HFTD Tier 3 in 2023
- n) Miles of LiDAR inspection in Non-HFTD in 2023
- o) Miles of LiDAR inspection in HFTD Tier 2 in 2023
- p) Miles of LiDAR inspection in HFTD Tier 3 in 2023
- q) Number of detailed aerial inspections in Other HFTD in 2023
- r) Number of detailed aerial inspections in HFTD Tier 2 in 2023
- s) Number of detailed aerial inspections in HFTD Tier 3 in 2023
- t) Number of detailed climbing inspections in Other HFTD in 2023
- u) Number of detailed climbing inspections in HFTD Tier 2 in 2023
- v) Number of detailed climbing inspections in HFTD Tier 3 in 2023
- w) Number of detailed ground-based inspections in Other HFTD in 2023
- x) Number of detailed ground-based inspections in HFTD Tier 2 in 2023
- y) Number of detailed ground-based inspections in HFTD Tier 3 in 2023
- z) Number of sectionalization devices installed in Other HFTD in 2023

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- aa) Number of sectionalization devices installed in HFTD Tier 2 in 2023
- bb) Number of sectionalization devices installed in HFTD Tier 3 in 2023
- cc) Miles of transmission ROW expansion performed in Other HFTD in 2023
- dd) Miles of transmission ROW expansion performed in HFTD Tier 2 in 2023
- ee) Miles of transmission ROW expansion performed in HFTD Tier 3 in 2023.

RESPONSE 2

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 7. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See attached spreadsheet titled “SDGE Response CalPA-SDGE-2025WMP-DR02.xlsx.”

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QUESTION 3

Please note that the geographical regions are mutually exclusive (i.e., “Other HFTD” excludes areas that are in either Tier 2 or Tier 3). Therefore, for any given circuit, the following relationships should hold:

- Tier 2 miles + Tier 3 miles + Other HFTD miles = total HFTD miles.
- Tier 2 miles + Tier 3 miles + Other HFTD miles + non-HFTD miles = total circuit miles.

Provide an Excel table of all distribution circuits existing as of January 1, 2023 (as rows) that were removed or decommissioned in 2023, either partially or entirely. This includes permanent removal, removal of overhead lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Include the following information in separate columns:

- a) Circuit name
- b) Circuit ID number
- c) Circuit miles removed or decommissioned in Non-HFTD Areas
- d) Circuit miles removed or decommissioned in Other HFTD
- e) Circuit miles removed or decommissioned in HFTD Tier 2
- f) Circuit miles removed or decommissioned in HFTD Tier 3
- g) Reason(s) for removal or decommissioning.

RESPONSE 3

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 7. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See attached spreadsheet titled “SDGE Response CalPA-SDGE-2025WMP-DR02.xlsx.”

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QUESTION 4

Provide an Excel table of all transmission circuits existing as of January 1, 2023 (as rows) that were removed or decommissioned in 2023, either partially or entirely. This includes permanent removal, removal of overhead lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Include the following information in separate column:

- a) Circuit name
- b) Circuit ID number
- c) Circuit miles removed or decommissioned in Non-HFTD Areas
- d) Circuit miles removed or decommissioned in Other HFTD
- e) Circuit miles removed or decommissioned in HFTD Tier 2
- f) Circuit miles removed or decommissioned in HFTD Tier 3
- g) Reason(s) for removal or decommissioning

RESPONSE 4

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 7. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See attached spreadsheet titled “SDGE Response CalPA-SDGE-2025WMP-DR02.xlsx.”

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END OF REQUEST