

**PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2025WMP-03
SDG&E RESPONSE**

Date Received: March 19, 2024

Date Submitted: April 8, 2024

Date Question 8 Submitted: April 12, 2024

Date Revised Question 8 Submitted: April 17, 2024 and April 19, 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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QUESTION 1

Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports conducted by internal entities that have been completed since January 1, 2023 and that examined any programs, initiatives, or strategies described in your 2023-2025 Base WMP.

RESPONSE 1

SDG&E objects to the request on the grounds stated in General Objections 1, 2, 3, and 5. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See attached zipped folder titled “CalAdvocates-SDGE-2025WMP-03_Q1 Internal QA_QC Reports.zip”.

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QUESTION 2

Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports conducted by external entities that have been completed since January 1, 2023 and that examined any programs, initiatives, or strategies described in your 2023-2025 Base WMP. External entities include, but are not limited to, consultants, contractors, auditors, court-appointed monitors, and Independent Evaluators.

RESPONSE 2

SDG&E objects to the request on the grounds stated in General Objections 1, 2, 3, and 5. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See attached zipped folder titled “CalAdvocates-SDGE-2025WMP-03_Q2 External QA_QC Reports.zip”.

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QUESTION 3

Provide an Excel table of all defects in the year 2023 found by Energy Safety's Compliance Branch (as rows) that includes the following information in separate columns:

- a) Associated circuit name
- b) Defect type
- c) Description of defect
- d) WMP initiative (from your 2023-2025 WMP update) associated with defect
- e) Date that the defect was identified
- f) Date that the defect was corrected
- g) If the defect has not yet been corrected as of the issuance date of this data request, a brief explanation
- h) Priority level of corresponding corrective tag
- i) Geographic latitude of defect in decimal degrees, truncated to seven decimal places
- j) Geographic longitude of defect in decimal degrees, truncated to seven decimal places.

RESPONSE 3

SDG&E objects to the request on the grounds stated in General Objections 1, 2, 3, and 5. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E interprets this question to mean Notices of Violation or Notices of Defect formally issued by Energy Safety's Compliance Branch in 2023. Energy Safety did not issue any Notices of Violation or Notices of Defect to SDG&E in 2023.

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QUESTION 4

For each WMP initiative for which you forecast capital expenditures in 2025 to be at least two times actual capital expenditures in 2023, please provide:

- a) The name of the initiative as it is identified in your 2025 WMP Update
- b) The WMP Initiative number in Table 11 of your 2025 WMP Update
- c) The name of the initiative as it is identified in your 2023-2025 Base WMP
- d) The WMP Initiative number in your 2023-2025 Base WMP
- e) An explanation for the projected increase.

RESPONSE 4

SDG&E objects to the request on the grounds set forth in General Objections numbers 2, 3, and 5. Subject to and without waiving the foregoing objections, SDG&E responds as follows.

1. Strategic Pole Replacement Program (WMP.1189)
 - a. Strategic Pole Replacement Program (WMP.1189)
 - b. SDG&E interprets this question to mean Table 11 of the non-spatial data tables filed in the Quarterly Data Reports. 2025 financial information will be reported in the May 1st Quarterly Data Report. The initiative will retain its initiative number of WMP.1189.
 - c. Strategic Pole Replacement Program (WMP.1189)
 - d. WMP.1189 - Section 8.1.2.10.2
 - e. This program was first introduced in 2023 and one pole was replaced within the year. 2025 expenditures increase to align with a forecast of 291 poles being replaced in 2025.
2. Expulsion Fuse Replacement Program (WMP.459)
 - a. Expulsion Fuse Replacement (WMP.459)
 - b. SDG&E interprets this question to mean Table 11 of the non-spatial data tables filed in the Quarterly Data Reports. 2025 financial information will be reported in the May 1st Quarterly Data Report. The initiative will retain its initiative number of WMP.459.
 - c. Expulsion Fuse Replacement Program (WMP.459)
 - d. WMP.459 - Section 8.1.4.4
 - e. 2025 expenditures increase to align with a forecast of 700 fuse replacements in 2025 versus 36 fuse replacements in 2023.

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3. Microgrids (WMP.462)
 - a. Microgrids (WMP.462)
 - b. SDG&E interprets this question to mean Table 11 of the non-spatial data tables filed in the Quarterly Data Reports. 2025 financial information will be reported in the May 1st Quarterly Data Report. The initiative will retain its initiative number of WMP.462.
 - c. Microgrids (WMP.462)
 - d. WMP.462 - Section 8.1.2.7
 - e. 2025 expenditures increased to align with the updated schedule for microgrid completion which shifted work from 2024 into 2025. This change is due to delays in acquiring appropriate land rights, ongoing supply chain issues that resulted in increases to material costs (i.e., battery, solar photovoltaic panels), and increases in labor costs. Completion of the permanent renewable components at the Shelter Valley and Buterfield Ranch microgrids are expected in 2025 and construction of two Remote Grid Standalone Power Systems is expected to begin in 2025.
4. Strategic Undergrounding (WMP.473)
 - a. Strategic Undergrounding (WMP.473)
 - b. SDG&E interprets this question to mean Table 11 of the non-spatial data tables filed in the Quarterly Data Reports. 2025 financial information will be reported in the May 1st Quarterly Data Report. The initiative will retain its initiative number of WMP.473.
 - c. Undergrounding of Electric Lines and/or Equipment (WMP.473)
 - d. WMP.473 - Section 8.1.2.2
 - e. 2025 expenditures increase to align with a forecast of 125 miles of undergrounding and capital expenditures within the 2024 Test Year GRC Settlement Agreement between SDG&E and the California Public Advocates Office.
5. Hotline Clamp Replacement Program (WMP.464)
 - a. Hotline Clamp Replacement Program (WMP.464)
 - b. SDG&E interprets this question to mean Table 11 of the non-spatial data tables filed in the Quarterly Data Reports. 2025 financial information will be reported in the May 1st Quarterly Data Report. The initiative will retain its initiative number of WMP.464.
 - c. Hotline Clamp Replacement Program (WMP.464)
 - d. WMP.464 - Section 8.1.4.5

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- e. 2023 capital expenditures for this program were \$0. This program's spending has previously been captured as operating expenditures, but are now being captured as capital expenditures.

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QUESTION 5

For each WMP initiative for which you forecast operating expenditures in 2025 to be at least two times actual operating expenditures in 2023, please provide:

- a) The name of the initiative as it is identified in your 2025 WMP Update
- b) The WMP Initiative number in Table 11 of your 2025 WMP Update
- c) The name of the initiative as it is identified in your 2023-2025 WMP
- d) The WMP Initiative number in your 2023-2025 WMP
- e) An explanation for the projected increase.

RESPONSE 5

SDG&E objects to the request on the grounds set forth in General Objections numbers 2, 3, and 5. Subject to and without waiving the foregoing objections, SDG&E responds as follows.

1. Strategic Pole Replacement Program (WMP.1189)
 - a. Strategic Pole Replacement Program (WMP.1189)
 - b. SDG&E interprets this question to mean Table 11 of the non-spatial data tables filed in the Quarterly Data Reports. 2025 financial information will be reported in the May 1st Quarterly Data Report. The initiative will retain its initiative number of WMP.1189.
 - c. Strategic Pole Replacement Program (WMP.1189)
 - d. WMP.1189 - Section 8.1.2.10.2
 - e. This program was first introduced in 2023 and one pole was replaced within the year. 2025 expenditures increase to align with a forecast of 291 poles being replaced in 2025.
2. Strategic Undergrounding (WMP.473)
 1. Strategic Undergrounding (WMP.473)
 2. SDG&E interprets this question to mean Table 11 of the non-spatial data tables filed in the Quarterly Data Reports. 2025 financial information will be reported in the May 1st Quarterly Data Report. The initiative will retain its initiative number of WMP.473.
 3. Undergrounding of Electric Lines and/or Equipment (WMP.473)
 4. WMP.473 - Section 8.1.2.2
 5. 2025 expenditures increase to include material yard lease costs recorded as operating expenditures from 2024 onwards.

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3. Clearance (WMP.501)
 - a. N/A - This initiative is not reported on within the 2025 WMP Update.
 - b. SDG&E interprets this question to mean Table 11 of the non-spatial data tables filed in the Quarterly Data Reports. 2025 financial information will be reported in the May 1st Quarterly Data Report. The initiative will retain its initiative number of WMP.501.
 - c. Clearance (WMP.501)
 - d. WMP.501 - Section 8.2.3.3
 - e. SDG&E included 2023 actual costs for this program within Detailed Vegetation Inspections (WMP.494) and show no actual expenditures associated with this program in Table 11 of the 2023 Q4 Non-Spatial Quarterly Data Report filed on February 1, 2024. SDG&E is implementing improvements to track the costs specific to trees which receive enhanced clearances and forecasts approximately \$10.5 million in expenditures in 2025.
4. Transmission Overhead Hardening – Distribution Underbuild (WMP.545)
 - a. Transmission Overhead Hardening – Distribution Underbuild (WMP.545)
 - b. SDG&E interprets this question to mean Table 11 of the non-spatial data tables filed in the Quarterly Data Reports. 2025 financial information will be reported in the May 1st Quarterly Data Report. The initiative will retain its initiative number of WMP.545.
 - c. Transmission System Hardening Program (WMP.543, WMP.544, WMP.545)
 - d. WMP.545 - Section 8.1.2.5.2
 - e. The 2025 projected capital expenditures for transmission overhead hardening – distribution underbuild were increased due to additional projects beginning in 2025 that will be completed in the 2026-2028 WMP cycle. The 2025 projected O&M expenditures were increased to align 2025 expenditures with historical O&M spend rates associated with these capital projects.

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QUESTION 6

Please fill out the attached spreadsheet, CalAdvocates-SDGE-2025WMP-03 Attachment 1, requesting information regarding your asset inspections in 2023.

RESPONSE 6

SDG&E objects to the request on the grounds set forth in General Objections numbers 2, 3, and 5. Subject to and without waiving the foregoing objections, SDG&E responds as follows.

See attached spreadsheet titled “SDG&E Response CalAdvocates-SDGE-2025WMP-03 Attachment 1.xlsx”

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QUESTION 7

Please provide a list of any incidents in 2023 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 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.

RESPONSE 7

SDG&E objects to the request on the grounds set forth in General Objections numbers 2, 3, and 5. Subject to and without waiving the foregoing objections, SDG&E responds as follows.

SDG&E did not have a safety incident in 2023 that meets the definition provided.

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QUESTION 8

Provide your workplan that describes where and when you will perform system hardening on distribution circuits in 2025. For projects that you expect to partially complete in 2025 (i.e., projects that started before 2025 and are expected to continue in 2025, or projects that are expected to be completed after 2025), please include the project and describe the work that you forecast will actually be performed in calendar year 2025.

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 2025 WMP Update 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 2025
- i) Length (in circuit miles) of underground conductor to be installed in 2025
- j) Length (in circuit miles) of overhead conductor to be permanently removed in 2025 and replaced by underground conductor (note that this may differ slightly from the previous section due to differing overhead and underground routes)
- k) Length (in circuit miles) of overhead conductor to be permanently removed in 2025 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 2025 (if this is greater than zero, please describe the type of system hardening project).

RESPONSE 8

SDG&E objects to the request to the extent it is overly broad and unduly burdensome, and to the extent it calls upon SDG&E to perform analyses or studies that do not exist, or requests

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information in a format not maintained by SDG&E. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Please see attached revised spreadsheet titled “SDG&E Response CalAdvocates-SDGE-2025WMP-03_Q08_Revised 4.19.24.xlsx.” Revisions include the addition of one project (0441-DUG-A-SUG) that was inadvertently excluded in SDG&E’s original submission, which is highlighted in yellow in this revised spreadsheet, and certain wildfire risk scores that were incorrect for some projects with multiple circuit segments. In addition, SDG&E added an additional column for its pre-mitigation wildfire risk scores, as further described in note 4 below.

Please note the following:

1. When there are multiple segments in one record, the wildfire risk score is the maximum value of those segments.
2. Some segments have N/A values for wildfire risk score. This does not necessarily reflect the wildfire risk score of the segments at the time of project scoping. Rather, SDG&E’s wildfire risk score data, as included in the attachment, is based upon an asset snapshot date of 1/1/23, whereas the segment IDs provided are based on the current system configuration. SDG&E endeavored to merge available data in a format responsive to Cal Advocates complete request, but in doing so, some current segment ID’s do not exist in the production model referenced in the 2024 update of the WMP.
3. As requested, the wildfire risk scores provided for this data request are referenced from the current WiNGS Planning production model that was used to estimate distribution risk in the 2025 WMP Update filing. But a previous version of the WiNGS Planning model (Version 2) was used to scope 2025 projects in process and risk scores may vary between model versions.
4. Revised 4/19/2024: To provide more clarity on the wildfire risk score, column e2) “Wildfire Risk Score” has been added to show the pre-mitigation score compared to the post-mitigation score. The original column e) Wildfire Risk Score originally indicated a post-mitigation score; in an effort to avoid confusion, the column has been explicitly renamed to “e) Wildfire Risk Score Post-mitigation”. The additional column named “e2) Wildfire Risk Score Pre-mitigation” has been added to the table to allow for understanding of the pre-mitigation wildfire risk score.

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QUESTION 9

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-03 Attachment 2. Add columns as needed.

RESPONSE 9

SDG&E objects to the request on the grounds set forth in General Objections numbers 2, 3, and 5. Subject to and without waiving the foregoing objections, SDG&E responds as follows.

See attached spreadsheet titled “SDG&E Response CalAdvocates-SDGE-2025WMP-03 Attachment 2.xlsx.”

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QUESTION 10

Please provide a spreadsheet listing (as rows) of every undergrounding project completed¹ during the period of January 1, 2023, through December 31, 2023, including non-WMP projects. 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 overhead circuit-miles removed
- i) Total circuit-miles of underground conductor installed
- j) Total miles of trenching required
- k) Total electric costs² of the project (i.e., costs attributed to your electric facilities), including costs for planning, design, permitting, and construction
- l) Total costs of the project, including costs attributed to non-electric utilities, including costs for planning, design, permitting, and construction
- m) Whether this was a Rule 20 project³ (yes/no)
- n) Whether this was a WMP project (yes/no)
- o) Whether this was a post-wildfire rebuild project (yes/no)
- p) Whether you shared trenches for this project with any telecommunications utilities (yes/no)
- q) Whether you shared trenches for this project with gas facilities (yes/no).

¹ For the purposes of this question and the following question, “completed” means a project has fully completed the construction phase.

² For the purposes of this question and the following question, “total costs” refers to the start-to-finish costs to complete the capital project, from planning to the end of construction. This does **not** include maintenance or operational costs *after* the underground infrastructure is complete and in use.

³ Constructed in accordance with the CPUC’s Electric Tariff Rule 20.

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RESPONSE 10

SDG&E objects to the request on the grounds set forth in General Objections numbers 2, 3, and 5. SDG&E specifically objects to any request seeking information outside the scope of SDG&E's WMP and thus not relevant to SDG&E's wildfire mitigation efforts or within the jurisdiction of the Office of Energy Infrastructure Safety. SDG&E's response is limited to WMP initiatives. Subject to and without waiving the foregoing objections, SDG&E responds as follows.

See attached spreadsheet titled "SDG&E Response CalAdvocates-SDGE-2025WMP-03_Q10.xlsx".

It should be noted that the geodatabase file serving as backup 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 11

Please provide a geodatabase file with a polyline feature for each undergrounding project completed during the period of January 1, 2023 through December 31, 2023. 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, matching part (b) of the previous question
- c) Project completion date, matching part (g) of the previous question.

RESPONSE 11

SDG&E objects to the request on the grounds set forth in General Objections numbers 2, 3, and 5. SDG&E specifically objects to any request seeking information outside the scope of SDG&E's WMP and thus not relevant to SDG&E's wildfire mitigation efforts or within the jurisdiction of the Office of Energy Infrastructure Safety. SDG&E's response is limited to WMP initiatives. Subject to and without waiving the foregoing objections, SDG&E responds as follows.

See attached zipped geodatabase file titled "CalAdvocates_SDGE_2025WMP_03_Q11.gdb."

It should be noted that the geodatabase file serving as backup 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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END OF REQUEST