

**PUBLIC ADVOCATES OFFICE**  
**DATA REQUEST: CALADVOCATES-SDGE-2025WMP-05**  
**SDG&E RESPONSE**

**Date Received: April 11, 2024**  
**Date Submitted: April 16, 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**

SDG&E provides on p. 44 of its 2025 WMP Update, in response to Area of Continued Improvement SDGE-23-02 (Calculating Risk Scores Using Maximum Consequence Values), Table 9: WiNGS-Planning Cost/Benefit Transition Plan.

- a) Does SDG&E expect the WiNGS-Planning model to be fully transitioned and utilizing probability distribution in time for its Comprehensive 2026-2028 WMP?
- b) If yes, does SDG&E expect the updated model to influence SDG&E's selection and scoping of mitigation work in its Comprehensive 2026-2028 WMP?

**RESPONSE 1**

SDG&E objects to the request to the extent it is overly broad, vague, and ambiguous. Further, SDG&E objects to the request to the extent it calls for speculation. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a) Yes
- b) Yes, as indicated in Section 1.1 of SDG&E's 2025 Wildfire Mitigation Plan Update the WiNGS-Planning model aids in the scoping and planning of grid hardening initiatives.

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**QUESTION 2**

SDG&E provides on p. 57 of its 2025 WMP Update, Figure 5: WiNGS-Planning Mitigation Decision Tree, in response to Area of Continued Improvement SDGE-23-06 (Demonstration of Proper Decision Making for Selection of Undergrounding Project).

Cal Advocates' understanding is that Figure 5 shows that the WiNGS-Planning model first provides an output of whether to perform undergrounding, before other mitigations like covered conductor are even considered. Is this correct?

**RESPONSE 2**

The WiNGS model employs a decision tree to select mitigations. The decision tree does not compare covered conductor RSE to underground RSE. The first branch on the decision tree is to measure whether it meets the RSE for undergrounding by segment. If the segment meets or exceeds the undergrounding RSE, the model recommends undergrounding as the proposed mitigation. Segments that do not meet the undergrounding RSE, are then evaluated for covered conductor mitigations. If the RSE for covered conductor is met or exceeded, the proposed mitigation is covered conductor. When neither condition is met, no mitigation is recommended. SDG&E reviews model outputs and conducts additional feasibility analyses to understand additional factors, including but not limited to land rights, environmental concerns, etc.

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**QUESTION 3**

SDG&E states on p. 99 of its 2025 WMP Update, in response to Area of Continued Improvement SDGE-23-12 (Covered Conductor Inspection and Maintenance), “The SAP CMP initial and annual training curriculum will also be updated to include a description of what potential issues qualified inspectors should be looking for during Distribution Overhead Patrol Inspections (WMP.488.)”

- a) Please provide a copy or excerpt of SDG&E's updated training curriculum that shows how SDG&E's qualified inspectors will identify and report the new potential issues unique to covered conductor.
- b) When does SDG&E expect to have all qualified inspectors certified to identify the new issues related to covered conductor?
- c) When will SDG&E be implementing the updated training?

**RESPONSE 3**

SDG&E objects to the request to the extent it is overly broad, vague, and ambiguous. Further, SDG&E objects to the request to the extent it calls for speculation. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a) SDG&E is still in the process of updating training curriculum to include new condition “codes” that will allow qualified inspectors to specify a potential damage observation related to covered conductor. SDG&E has already provided training to qualified inspectors related to proper construction and installation of covered conductor. Therefore, qualified inspectors that have already received that training would be capable of identifying deviations to properly installed covered conductor.
- b) Qualified inspectors are required to attend and pass an initial training course and attend annual refresher training. New issues related to covered conductor, as well as any other new and emerging issues, would be added to the initial and refresher training courses. Qualified inspectors are currently qualified to identify surface damages to the cover and its connections, such as corrosion, bulging, cracking or other imperfections to the conductor. The identification of imperfections to the conductor is very similar to how traditional bare conductor is inspected. If anomalies are visually observed, they are reported to supervisory personnel for further analysis.
- c) SDG&E will implement the updated training in Q1 2025.

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**QUESTION 4**

SDG&E states on p. 99 of its 2025 WMP Update, in response to Area of Continued Improvement SDGE-23-12 (Covered Conductor Inspection and Maintenance), “Finally a limited number of Distribution Infrared Inspections (WMP.481) will be performed on existing covered conductor circuit segments to determine whether thermography may be useful in identifying any potential damage conditions to the covered conductor.”

- a) Please describe the scope of the thermography study in the abovementioned inspections on existing covered conductor circuit segments.
- b) Please provide the schedule of when SDG&E will conduct the abovementioned inspections on existing covered conductor circuit segments.
- c) Please describe the describe the methodology that SDG&E will be using in the inspections on existing covered conductor circuit segments.
- d) How can infrared inspections help identify the different potential damage conditions to a covered conductor?
- e) When does SDG&E expect to make any updates to its procedures for infrared inspections, if the thermography proves to be useful for identifying damage on a covered conductor?

**RESPONSE 4**

SDG&E objects to the request to the extent it is overly broad, vague, and ambiguous. Further, SDG&E objects to the request to the extent it calls for speculation. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a) The scope of the thermography study will include the selection of 3 to 4 circuit segments that have been reconstructed with covered conductor. We will then use the thermography equipment to determine whether it can help identify heat anomalies, especially at the connection points, that could indicate an issue that could lead to a potential failure.
- b) The infrared inspections will be done in quarter three of this year.
- c) The thermographers will use infrared cameras and equipment to identify issues that cannot or can be difficult be see through visual observation, such as water intrusion, corrosion, or minor damage to splice covers.

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- d) Similar to performing infrared inspections on uncovered conductor and connections, infrared inspections can help identify heat anomalies that can indicate potential damage that cannot be seen or be difficult to see through visual observation. Those heat anomalies then allow a more focused analysis of that particular piece of equipment or connection to identify any damages that could lead to a failure.
  
- e) If the thermography proves to be productive in identifying damage to the covered conductors in quarter three, SDG&E will look to potentially update its procedures to include covered conductors the following year, 2025.

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**QUESTION 5**

SDG&E provides, on p. 21 of its 2025 WMP Update, Table 6: Qualifying Changes in Targets and Expenditures (in Thousands), where SDG&E provides an updated 2025 WMP target of 300 total inspections for WMP Initiative 481: Distribution Infrared Inspections.

- a) How many of the projected 300 inspections for 2025 will be part of the thermography study referenced above in the previous question.
- b) How did SDG&E's risk-informed strategy determine a nearly 97% reduction in structures targeted for inspection?
- c) Does SDG&E's new risk-informed strategy still consider the entire service territory of SDG&E or is it only focused on the HFTD areas of SDG&E's service territory?

**RESPONSE 5**

SDG&E objects to the request to the extent it is overly broad, vague, and ambiguous. Further, SDG&E objects to the request to the extent it calls for speculation. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a) Zero of the projected 300 inspections for 2024 are going to be part of the thermography study for covered conductor circuit segments. Covered conductor infrared inspections will be in addition to the 300 inspection target. Depending on the results of the infrared inspections, SDG&E will determine whether to continue performing infrared inspections in 2025.
- b) The reduction in the number of infrared inspections was based on an evaluation of the results of infrared inspection results over the past four years which yielded an annual average of a 0.2% findings rate. This extremely low find rate prompted SDG&E to work on developing a new approach to provide more value. That modified approach will target higher usage areas in the WUI during peak load season.
- c) The risk-informed strategy considers structures in the HFTD and higher wildfire risk areas in the WUI within SDG&E's service territory. Non-HFTD and low wildfire risk areas are not considered in this scope. However, it is important to note that SDG&E uses infrared equipment to investigate undetermined outages/faults and potential early fault warning areas. Because these infrared inspections are reactive in nature, they are not currently tracked and reported as part of WMP reporting.



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**QUESTION 6**

SDG&E provides, on p. 99-100 of its 2025 WMP Update, a response to Area of Continued Improvement SDGE-23-13 (QA/QC Inspections). With this understanding, please provide an answer to the questions below:

- a) Does SDG&E plan on incorporating drone inspections as part of the future QA/QC for detailed inspections?
- b) If the answer to part (a) above is yes, when does SDG&E plan on incorporating drones as part of detailed inspections?
- c) If the answer to part (a) above is no, please explain why not.
- d) Will SDG&E start to report a pass/fail rate for QA/QC inspections during the first quarter of 2024?
- e) Cal Advocates' understanding is that SDG&E is moving from a 3-month timed audit inspection to a 1-month timed audit inspection. Is this correct?

**RESPONSE 6**

SDG&E objects to the request to the extent it is overly broad, vague, and ambiguous. Further, SDG&E objects to the request to the extent it calls for speculation. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a) No. Beginning in 2023, drone inspections replaced the discontinued QA/QC Inspection Program, which is different from QA/QC for detailed inspections.
- b) N/A
- c) As stated in response to ACI SDGE-23-13, drone inspections are not used to conduct QA/QC for detailed inspections. Beginning in 2025, QA/QC for detailed inspections (WMP.491) will consist of supervisors assessing 50% of issues identified within one month beginning in the first calendar month that the inspection occurred. In addition, 5% of completed inspections will be audited by quality control personnel via field visits.
- d) SDG&E will begin reporting a pass/fail rate resulting from its new QA/QC process for overhead detailed inspections beginning in Q1 2025.
- e) Yes, in 2025, SDG&E will transition to performing a QA/QC audit of its overhead detailed inspections within 30 days beginning in the first full calendar month after the inspection was performed.

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**QUESTION 7**

SDG&E states, on p. 101 of its 2025 WMP Update, in response to Area of Continued Improvement SDGE-23-15 (Evaluation of Sensitive Relay Profile in Highest Risk Areas):

*An analysis was performed utilizing GIS data to understand the coverage provided by SRP-enabled devices within the HFTD. The number of overhead circuit miles downstream of SRP capable devices within the HTD and thus protected by SRP, was compared against the total overhead circuit miles within the HFTD.*

- a) How did SDG&E identify an overhead circuit that is “downstream” and SRP-protected during the GIS analysis that SDG&E conducted?
- b) What is the total circuit-miles of SRP program coverage that SDG&E has in non- HFTD areas of its service territory?

**RESPONSE 7**

SDG&E objects to the request to the extent it is overly broad, vague, and ambiguous. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a) SDG&E identified all SRP capable devices on the distribution system that had primary overhead HFTD circuit miles downstream (towards the load) of the device. SDG&E defined these overhead miles downstream of SRP capable devices as being protected by SRP when enabled.
- b) SDG&E has not performed any similar analysis on non-HFTD circuit-miles equipped with SRP functionality.

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**END OF REQUEST**