

**PUBLIC ADVOCATES OFFICE**  
**DATA REQUEST: CALADVOCATES-SDGE-2025WMP-06**  
**SDG&E RESPONSE**

**Date Received: April 12, 2024**  
**Date Submitted: April 17, 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**

With reference to:

- 2025 WMP Update, Table 10 (Ranking of Planned Mitigation Initiatives), p. 48, and
  - Base WMP, OEIS Table 7-4 (Summary of Risk Reduction for Top-Risk Circuits), p. 128,
- a) Please clarify if the “Total Risk” in Table 10 in the column labeled “Percentage of Total Risk Mitigated in the Final Year”, is the same as the “Overall Risk” used in Base WMP, OEIS Table 7-4.
  - b) Please explain the meaning of “PSPS dependencies” on p. 46-47.
  - c) Please explain which of the circuit-segments in Table 10 were adjusted due to PSPS dependencies.
  - d) If none of the circuit-segments were adjusted due to PSPS dependencies, please explain how PSPS dependencies are used in the WiNGS Planning prioritization of mitigations.

**RESPONSE 1**

- a) Table 10 (Ranking of Planned Mitigation Initiatives) in the 2025 WMP Update displays the top wildfire risk circuit segments with risk reduction milestones. The column labeled “Percentage of Total Risk Mitigated in the Final Year,” refers to only wildfire risk as do all of the mitigation milestone columns as seen in the screenshot below:

| Year Hardening Mitigations Will Begin | Year at which Risk Reduction reaches 50% | Year at which Risk Reduction reaches 75% | Year Hardening Mitigations Will End | Percentage of Total Risk Mitigated in the Final Year |
|---------------------------------------|--|--|-------------------------------------|--|
|---------------------------------------|--|--|-------------------------------------|--|

The column labeled Overall Risk in Table 7-4 of the Base WMP is the sum of wildfire risk and PSPS risk.

- b) “PSPS dependencies” refers to the aspect of the scoping process where PSPS benefits are evaluated for segments, including upstream and downstream segments, when considering proposed grid hardening projects and project order.

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- c) Segment 157-81R, see adjustment explanation column in Table 10: Ranking of Planned Mitigation Initiatives in 2025 WMP Update.
- d) See SDG&E's response to question 1b above.

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**QUESTION 2**

With reference to:

- 2025 WMP Update, Table 10 (Ranking of Planned Mitigation Initiatives), p. 48, and
- Base WMP, OEIS Table 7-4 (Summary of Risk Reduction for Top-Risk Circuits), p. 128,

Your Base WMP at p. 127 states that

*some segments in the list of segments with the highest risk...are currently scoped outside of this WMP cycle for mitigation due to prior hardening, permitting, and/or complexity for these projects, therefore will not be found in OEIS Table 7-4.*

For the circuit segments listed below that were not included in your Base WMP, OEIS Table 7-4, please explain the reason(s) for “No adjustments” in the column “Explanation for Prioritization Adjustment” in your 2025 WMP Update, Table 10:

- a) 909-805R
- b) 79-808R
- c) 237-1765R
- d) 214-1122R
- e) 237-17R
- f) 216-1857.

**RESPONSE 2**

A value of “No adjustments” in the “Explanation for Prioritization Adjustment” column in Table 10 of the WMP Update indicates that scoping and the associated desktop feasibility analysis continued consistent with the Wildfire Risk Ranking and expected scoping year predicted the WiNGsS model.

Clarification on the differences in table ranks: The segments listed in 2025 WMP Update, Table 10 (Ranking of Planned Mitigation Initiatives) are listed in order of wildfire risk, while the segments listed in Base WMP, OEIS Table 7-4 (Summary of Risk Reduction for Top-Risk Circuits) are listed in order of overall risk, which is a combination of wildfire risk and PSPS risk.

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**QUESTION 3**

With reference to:

- 2025 WMP Update, Table 10 (Ranking of Planned Mitigation Initiatives), p. 48, and
- Base WMP, OEIS Table 7-4 (Summary of Risk Reduction for Top-Risk Circuits), p. 128,

Table 1 below shows an excerpt from your 2025 WMP Update, Table 10, with an added column marking the difference that is not explained between the 2025 WMP Update, Table 10, and the Base WMP, OEIS Table 7-4.

- a) There are discrepancies between your WMP Update and your Base WMP that are not explained in the “Explanation for Prioritization Adjustments” column of your 2025 WMP Update, Table 10. For each instance, please explain why there is a discrepancy.

| Table 1. Circuit segments with a difference in risk mitigation between the Base WMP and WMP Update. The columns in blue are excerpted directly from your WMP Update, Table 10. The column in yellow shows the change between your WMP Update and Base WMP. |                    |                |  |   |
|--|--------------------|----------------|--|---|
| Segment ID   | Wildfire Risk Rank | PSPS Risk Rank | Explanation for Prioritization Adjustments | Difference between WMP Update and Base WMP  |
| 222-1401R  | 3                  | 246            | No adjustments                             | Update says it will be 100% mitigated in 2025. Base WMP said it would reduce by 22% by the beginning of 2026.         |
| 524-69R  | 4                  | 104            | No adjustments                             | Update says it will reach 100% risk mitigated in 2025. Base WMP said it would reduce 37% by the beginning of 2026.    |
| 222-1364R  | 5                  | 9              | No adjustments                             | Update says it will reach 100% risk mitigation by 2028. Base WMP said it would reduce 100% by the beginning of 2026.  |
| 217-983R   | 7                  | 178            | No adjustments                             | Update says it will reach 100% risk mitigation by 2024. Base WMP said it will reduce 33% by the beginning of 2026     |
| 222-1370R  | 8                  | 13             | No adjustments                             | Update says it will reach 100% risk mitigation by 2024. Base WMP said it would reduce 12% by the beginning of 2026    |
| 73-643R  | 13                 | 65             | No adjustments                             | Update says it will reach 100% risk mitigation by 2026. Base WMP said it would reduce by 23% by the beginning of 2026 |
| 220-298R   | 18                 | 246            | No adjustments                             | Update says it will reach 100% risk mitigation by 2026. Base WMP said it would reduce by 24% by the beginning of 2026 |
| 445-1311R  | 22                 | 246            | No adjustments                             | Update says it will reach 50% risk mitigation by 2024. Base WMP said it would reduce by 43% by the beginning of 2025  |

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**RESPONSE 3**

Differences in construction scoping between the Base WMP and the WMP Update center around updated work scope data used for the WiNGS Planning model referenced in the 2025 WMP Update compared to the work scope data used in the WiNGS Planning model referenced in the Base WMP. With each subsequent model version, work scope data is updated to match the current projected construction plan. Updates to work scope data can consist of cleaned or validated data and/or updated projected construction plans based on reallocated work scope. The work scope data also typically contains over scope information, which helps meet construction targets should an issue arise that prohibits timely construction on a planned segment. The over scope data consists of alternative segments to harden within a year. As the year closes, the over scope data that hasn't commenced construction is moved to another year in the work scope data. The 2025 WMP Update references the current WiNGS Planning Production model. Subsequent model updates will contain work scope updates for the reasons stated above.

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**QUESTION 4**

Your Base WMP at p.155 states

*the PSPS wind speed threshold for fully covered circuit segments is expected to be set between 55 and 60 [miles per hour]...SDG&E expects to complete covered conductor testing and finalize this threshold by December 2023.*

- a) Please explain if you have completed this testing and finalizing of thresholds.
- b) Please explain SDG&E's findings about covered conductor's effects on setting PSPS wind speed thresholds.
- c) Please explain SDG&E's findings about covered conductor's effects on reducing PSPS risk.
- d) Please explain if the aforementioned process ("covered conductor testing and finalize this threshold") changed how PSPS impacts are evaluated in your WiNGS-Planning model.

**RESPONSE 4**

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) Yes, SDG&E has completed the testing.
- b) SDG&E found that covered conductor is effective against minor contact from foreign objects, but is susceptible to failure associated with heavier contacts such as tree fall-in or contacts that can damage the covering. SDG&E is in the process of updating its internal documentation to implement a 58mph wind speed threshold for fully covered circuit segments. SDG&E currently has one circuit segment that is fully covered. SDG&E plans to implement the higher wind speed threshold for this circuit segment prior to September 1, 2024, which is typically the start of the region's peak fire season.
- c) Increasing the covered conductor wind speed threshold is expected to have some effect on PSPS risk reduction, but the exact reduction is unknown at this time.
- d) At this writing, the adoption of a 58 mph covered conductor wind speed threshold is underway but not yet completed. Upon adoption of the 58 mph threshold, the WiNGS Planning model will update the PSPS threshold starting constant variable to reflect this change.

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**QUESTION 5**

Your Base WMP at p. 165 states

*the WiNGS-Planning model is utilized to explore the potential use of segment-level risk analysis to inform the identification of additional microgrid sites as a potential alternative to other initiatives such as grid hardening.*

- a) Please explain how your WiNGS-Planning model evaluates siting of microgrids.
- b) Please explain whether during the evaluation of siting microgrids, there is greater consideration given to PSPS or wildfire risk.

**RESPONSE 5**

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) The WiNGS Planning model does not utilize or recommend the siting of microgrids as a mitigation type; however, the WiNGS Planning model is used to reference wildfire and PSPS risk when scoping microgrid projects. As stated in the 2025 WMP Update (section 5.6.2 Use of Risk Model to Inform Mitigation Work Outside of Grid Hardening), the WiNGS Planning model currently only recommends grid hardening projects in the form of covered conductor and undergrounding. While microgrids are not considered in the WiNGS-Planning mitigation framework, the detailed data contained in the WiNGS-Planning model such as asset information, customer information and counts, as well as Wildfire and PSPS risk scores, serve as a valuable reference when planning alternative mitigations, such as microgrids. If a location is not a subject for grid hardening through covered conductor or undergrounding, the data from WiNGS Planning can assist in targeting additional mitigation measures such as microgrids.
- b) While PSPS risk is considered in microgrid siting, the main driver is the reduction of wildfire risk.

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**QUESTION 6**

Your WMP Update at p. 45 states that PSPS risk

*is not integrated into the circuit segment RSE score, which is utilized for the selection of appropriate mitigations. Instead, PSPS risk estimates are leveraged during the scoping process to determine where PPS benefits can be achieved while prioritizing wildfire mitigations.*

You also provide Table 10 (Ranking of Planned Mitigation Initiatives) which only addresses your top 5% wildfire risk circuits/segments/spans.

- a) For the circuits listed in Table 2 (Top 5% PPS Risk Circuits/Segments/Spans), p. 6-7, please explain how SDG&E evaluates and selects risk mitigations.
- b) Please explain if SDG&E is considering any specific PPS risk mitigations for the circuit segments in Table 2.

**RESPONSE 6**

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 evaluates all HFTD circuit segments, including the circuits listed in Table 2 (Top 5% PPS Risk Circuits/Segments/Spans), using the WiNGS Planning model. As stated in SDG&E's 2025 WMP Update, (section 5.3.1 PPS Risk Prioritization in Risk-Based Decisions), wildfire RSE's are utilized in the WiNGS Planning model. Wildfire risk is perceived as greatly exceeding PPS risk and generally drives grid hardening strategy. The column titled "Wildfire / PPS Ratio in Table's 1 and 2 of the 2025 WMP Update shows the proportion of risk between wildfire and PPS. As evidenced by the column values in the highest ranked wildfire risk circuit segments (Table 1), wildfire risk values typically far exceed PPS risk values. This situation also occurs in many of the highest ranked PPS risk circuit segments (Table 2).

PPS risk reduction is quantified in the model output; however, it is not used in the mitigation selection framework. A model enhancement to integrate PPS risk into the mitigation selection framework has been generated with development expected to commence this year.

- b) While wildfire risk mitigation is the primary driver for grid hardening efforts, SDG&E maintains focus on reducing PPS impacts during the scoping process, and maximizing PPS benefits in conjunction with wildfire mitigation is a top priority for scoping engineers. PPS risk mitigations may be achieved through grid hardening projects such

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as PSPS Sectionalizing Devices and Strategic Undergrounding. See section 9.1.2, table 9-2 of the 2023-2025 WMP for mitigation efforts on Frequently De-energized Circuits. PSPS impact reductions are achieved through programs such as Microgrids (see section 8.1.2.7 of the 2023-2025 WMP), Standby Power Program, Generator Grant Program, and Generator Assistance Program.

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**END OF REQUEST**