

**PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2025WMP-07
SDG&E RESPONSE**

**Date Received: April 19, 2024
Date Submitted: April 24, 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 states in response to Question 6(d) of data request CalAdvocates-SDGE-2025WMP-05,

“SDG&E will begin reporting a pass/fail rate resulting from new QA/QC process for overhead detailed inspection beginning in Q1 2025.”

- a) Please explain why SDG&E is unable to start reporting a pass/fail rate for its overhead detailed inspections for any portion of the 2024 calendar year.
- b) Cal Advocates’ understanding is that SDG&E will not proceed with updating the timing of QA/QC audit processes of its overhead detailed inspections (moving from a 3-month time period for audit inspection to a 1-month audit inspection) during the 2024 calendar year, and that the change in timing will occur starting in 2025. Is this correct? If not, please explain.

RESPONSE 1

- a) SDG&E is unable to report a pass/fail rate for overhead detailed inspections for 2024 because it will not transition to performing audits within 1 month following the month the inspection was performed until 2025. Currently the audits for our overhead detailed inspections occur within the subsequent three-month quarter after the inspection. Because there is a potential that infractions or issues arise during the three-month period between the inspection and audit, assigning using a pass/fail designation could be inaccurate. Thus, the new reporting will begin when the period between audit and inspection is shorter to promote accuracy in the initiative.
- b) Yes, SDG&E is anticipating implementing the change from the 3-month time period to the 1-month time period in 2025. This period will allow for the development of staffing, technology, and process changes to implement the change.

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END OF REQUEST