

**GREEN POWER INSITITUTE DATA REQUEST:  
GPI-SDGE-2023WMP-03  
SDG&E RESPONSE**

**Date Received: May 11, 2023  
Date Submitted: May 16, 2023**

**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**

Please provide:

- The number of trees removed in 2019, 2020, 2021, and 2022 and the program under which the removals occurred (e.g. Fall-in Mitigation Program)
- The number of planned tree removals for 2023, 2024, and 2025, and the program under which the removals will occur (e.g. Fall-in Mitigation Program)
- The number of remaining trees in SDG&Es tree inventory listed for removal

**RESPONSE 1**

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2 and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E’s fall-in mitigation is integrated within the detailed inspection and off-cycle HFTD patrol activities as provided in the 2023 WMP. SDG&E removes trees to prevent power line contact that may result from branch breakout or trunk failure (e.g., hazard tree), and/or to mitigate fast-growing trees or those that cannot be maintained by continued pruning. SDG&E does not plan in advance exactly how many trees will be removed in a calendar year. That determination is made at time of inspection taking into account current tree-specific and site-specific conditions.

Please see attachment titled, “GPI\_SDGE\_2023WMP\_03\_Q1”. The worksheet includes all trees removed 2019-2022, and split out in a pivot table by hazard condition code (CDRRM; CGRRM), and those removed based on other criteria (CRM). The completed removal condition codes are:

- CDRRM – Completed, dead, reliability removal
- CGRRM – Completed, green, reliability removal
- CRM – Completed removal

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**QUESTION 2**

Please provide the number of distribution line miles SDG&E will perform trimming on to achieve enhanced clearances (> 12').

**RESPONSE 2**

SDG&E objects to the request on the grounds set forth in General Objections Nos. 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E does not plan or forecast in advance the number of miles it will perform enhanced clearance. This work is not planned in advance to occur on specific circuits or circuit segments within the HFTD. The determination of whether an individual tree will receive enhanced clearance is made at the time of trim based on the appropriate clearance needed for that tree considering variables such as species, growth rate, location of defect, proper pruning, and tree health.

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**QUESTION 3**

Please provide any existing quantitative metrics (e.g. kg, truckloads, etc.) on the total amount of vegetation management “waste” (or residues) produced each year from 2020 – 2022, and the annual amounts that are disposed of at recycling facilities, landfills, biomass facilities, or other facilities.

**RESPONSE 3**

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 3, and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

The table below provides the annual amount (tonnage) of green waste disposal associated with vegetation management in years 2020-2022.

<b>Year</b>	<b>Landfill</b>	<b>Recycling Facility</b>	<b>Total</b>
2020	9704	4541	14245
2021	5753	5387	11140
2022	5449	5715	11164
Total	20906	15643	36549

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**QUESTION 4**

Please provide the number of customer requests to retain woody biomass resulting from vegetation management activities on private property, state property, and federal property.

**RESPONSE 4**

As standard operating practice, SDG&E leaves large woody debris associated with tree pruning and removal activities on site, cut into manageable lengths. Large woody debris is considered material approximately greater than six (6) inches diameter. On public lands such as state and federal properties, wood debris is lopped and scattered or removed from site upon agency request.

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**QUESTION 5**

Please describe current agreements and any recent (2021-Present) communications with state and federal agencies regarding fuels and slash management practices on state and federal lands, respectively.

**RESPONSE 5**

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

SDG&E and the US Forester Service completed an updated Master Special Use Permit which describes utility protocols for activities occurring on the Cleveland National Forest. The permit includes protocols and requirements related to vegetation management activities such as tree trimming and fuels modification. As part of its Natural Communities Conservation Plan (NCCP), SDG&E performs pre-activity environmental reviews where activities are planned on public lands such as state parks, tribal lands, BLM, and US Forest Service. These environmental reviews identify protected species and define specific NCCP protocols and constraints for preventing negative impact to protected species. In conjunction with required notification protocols for these same agencies, SDG&E provides scoping details and schedules for annual vegetation management activities.

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**QUESTION 6**

Please provide the number of tree rebates provided in the Community Tree Rebate Program (WMP.1326) for each year from 2019-2022 and the projected number of rebates for years 2023-2025.

**RESPONSE 6**

The Community Tree Rebate Program was initiated in 2022. A total of 2,047 rebates were provided in 2022. SDG&E forecasts approximately 3,000 rebates annually for the next few years. The exact end date for this program has not been finalized.



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**END OF REQUEST**