

**GREEN POWER INSITITUTE DATA REQUEST:
GPI-SDGE-2025WMP-01
SDG&E RESPONSE**

Date Received: April 26, 2024

Date Submitted: May 1, 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

Please provide any SDG&E slides, meeting materials, and meeting minutes generated for and/or presented at the two Joint IOU working sessions held in 2023 to “discuss the different types of programs and practices each IOU has in place for disposing and recycling woody debris and vegetation.”¹

RESPONSE 1

SDG&E objects to the request to the extent it seeks information that is not in the custody or control of SDG&E, and is irrelevant to SDG&E’s Wildfire Mitigation Plan. SDG&E’s response is limited to SDG&E’s materials and participation in the Joint IOU working sessions. Any materials pertaining to PG&E or SCE should be separately requested and obtained from the respective custodian. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Please see attached folder titled, GPI-SDGE-2025 WMP-01_Q1.

SDG&E is providing the meeting minutes and Outlook calendar invite for the meeting which took place June 20, 2023; 12:30pm -1:00pm, and was attended by SDG&E, PG&E, and SCE. The host utility was SCE. The purpose of the meeting was to have an initial working session to discuss the different types of programs and practices each IOU has in place for disposing and recycling woody debris associated with utility line clearance operations.

SDG&E is also providing the meeting minutes and Outlook calendar invite for the meeting which took place August 11, 2023; 12:00pm -1:00pm, and was attended by SDG&E, PG&E, and SCE. The host utility was PG&E. The purpose of this meeting was to continue the discussion from the initial meeting in June, and was centered on issues including: applicable safety standards, agency requirements, customer engagement, etc.

¹ SDG&E 2025 WMP Update, April 2, 2024, pp. 52-53

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QUESTION 2

Please provide any SDG&E slides, meeting materials, and meeting minutes generated for and/or presented at the Joint IOU meeting held in 2023 to “discuss each utility’s respective fuels management programs and began initial collaboration on a possible scoping study on best practices and efficacy of fuels management.”²

RESPONSE 2

SDG&E objects to the request to the extent it seeks information that is not in the custody or control of SDG&E, and is irrelevant to SDG&E’s Wildfire Mitigation Plan. SDG&E’s response is limited to SDG&E’s materials and participation in the Joint IOU working sessions. Any materials pertaining to PG&E or SCE should be separately requested and obtained from the respective custodian. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Please see attached folder titled, GPI-SDGE-2025 WMP-01_Q2. SDG&E is providing the Outlook calendar invite for this meeting which took place November 9, 2023; 1:00pm – 2:00pm, and was attended by SDG&E, PG&E, and SCE. The host utility was SDG&E. The Outlook calendar screenshot includes the minutes and agenda for the meeting. During the meeting an initial study proposal was developed along with a questionnaire to be completed by each utility describing their current practices related to fuels management. The study proposal and questionnaire are also provided.

² SDG&E 2025 WMP Update, April 2, 2024, pp. 52-53

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QUESTION 3

Please provide a summary of any developments since the 2023 meeting and working sessions towards initiating a Joint IOU scoping study on best practices and efficacy of fuels management, including but not limited to planned topics for inclusion in the scoping study.

RESPONSE 3

SDG&E objects to the request to the extent it seeks information that is not in the custody or control of SDG&E, and is irrelevant to SDG&E's Wildfire Mitigation Plan. SDG&E's response is limited to SDG&E's materials and participation in the Joint IOU working sessions. Any materials pertaining to PG&E or SCE should be separately requested and obtained from the respective custodian. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Please see attached folder titled, GPI-SDGE-2025 WMP-01_Q3. SDG&E is providing the Outlook calendar invites for meetings that have taken place in 2024 subsequent to the initial meeting in November, 2023. These meetings were held on 2/20/24, 3/5/24, 3/25/24 and 4/29/24, and were attended by SDG&E, SCE, and PG&E.

SDG&E held several meetings with the joint IOUs in the first quarter of 2024 to continue discussion on the development of the scope of the fuels management study, and the engagement of the third-party to lead the initiative. In 2024 Cal Poly Wildland Urban Interface (WUI) Fire Institute was brought in to lead the joint IOU fuels management study. In April, the final research proposal was agreed upon by the group. SDG&E is providing this scoping document for the fuels management study resulting from the meetings referenced above. Meetings will continue through 2024, and the study is currently expected to be completed sometime in 2025.

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END OF REQUEST