

**MUSSEY GRADE ROAD ALLIANCE DATA REQUEST:
MGRA-SDGE-2023WMP-03**

**Date Received: April 25, 2023
Date Submitted: April 28, 2022**

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 undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

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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

MGRA-3-1 SDG&E provided as an appendix a report authored by the San Diego Computing Center, which it used as its basis for Area for Continued Improvement SDGE-22-09.

- a. Please provide the definition of “wind gust” used in the SDSC analysis.
- b. Please provide the definition of “wind speed max” used in the SDSC analysis, differentiating it from “wind gust”.
- c. Please provide the definition of “wind speed mean” used in the SDSC analysis.
- d. When SDG&E refers to “deltas between wind speed and wind gust” is it referring to delta between “wind speed max” and “wind gust” or “wind speed mean” and “wind gust”.
- e. Please provide a tabular or spreadsheet form of figure “Outage v/s Non-Outage wind speed %ile - 24h buckets all time”.
- f. Please provide a tabular or spreadsheet form of the figure “Outage v/s Non-Outage wind gust max %ile - 24h buckets all time”.
- g. Please provide a tabular or spreadsheet form of the figure “Outage v/s Non- Outage wind gust mean %ile - 24h buckets all time”.
- h. Please provide a tabular or spreadsheet form of the figure “Outage v/s Non- Outage wind gust delta max %ile - 24h buckets all time”.
- i. Please provide a tabular or spreadsheet form of the figure “Outage v/s Non- Outage wind gust delta mean %ile - 24h buckets all time”.

RESPONSE 1

- a. Wind gust is calculated through the wind speed and the UST variable from the forecast: $\text{wind_gust} = \text{wind_speed} + 7.71 * \text{UST}$, where the value 7.71 was previously discussed with SDGE. Note that the UST variable in the WRF data is updated every hour.
- b. “Wind speed max” is the maximum value of the wind speed in a 24h bucket. For an hourly updated model, there are 24 values corresponding to each hour of the day. “wind speed max” corresponds to the maximum of these 24 values. Please see the complete description of the process for calculating wind speed aggregated values in the

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Methodology section. For each hour of the day, we can calculate the “wind gust”, which is simply another variable.

- c. “Wind speed mean” is the average value of the wind speed in a 24h bucket. It is calculated the same way we calculated “wind speed max”, but we used the “mean” aggregation for the “wind speed mean”. Please see the complete description of the process for calculating wind speed aggregated values in the Methodology section of the attached “Wind Analysis Report for SDG&E – DISTRIBUTED – April 2023.pdf”
- d. Delta(wind speed, wind gust) refers to the delta between the max and mean aggregations (for each 24h bucket) of wind speed and wind gust. In other words, delta max refers to the delta between wind speed max and wind gust max, and delta mean refers to the delta between wind speed mean and wind gust mean. Please see the detailed description in the Delta (wind speed, wind gust) Analysis section of the attached “Wind Analysis Report for SDG&E – DISTRIBUTED – April 2023.pdf.”

For responses e-i, please see “Wind Analysis Report – Supplemental Materials.zip.”

- e. See figure 3 Figure 3 - Outage wind speed max %ile - 24h buckets all time.csv & Figure 3- NonOutage wind speed max %ile - 24h buckets all time.csv
- f. Please see Figure 17 - Outage wind gust max %ile - 24h buckets all time.csv & Figure 17 - NonOutage wind gust max %ile - 24h buckets all time.csv
- g. Please see Figure 19 - Outage wind gust mean %ile - 24h buckets all time.csv & Figure19 - NonOutage wind gust mean %ile - 24h buckets all time.csv
- h. Please see Figure 14 - Outage wind gust delta max %ile - 24h buckets all time.csv & Figure 14 - NonOutage wind gust delta max %ile - 24h buckets all time.csv
- i. Please see Figure 15 - Outage wind gust delta mean %ile - 24h buckets all time.csv & Figure 15 - NonOutage wind gust delta mean %ile - 24h buckets all time.csv. Additionally, please see Please see Figure 5 - Outage wind speed mean %ile - 24h buckets all time.csv & Figure 5 - NonOutage wind speed mean %ile - 24h buckets all time.csv for outage vs non-outage wind speed mean.

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QUESTION 2

What would the overall system PSPS risk reduction be reduced to if the minimum threshold for de-energization was raised to:

- a. 60 mph
- b. 65 mph
- c. 70 mph

RESPONSE 2

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

The PSPS probabilities are currently derived by subject matter experts using their knowledge of local terrain and weather conditions. As a result, bracketing the PSPS threshold cannot be done in an automated and timely manner at this time. Sensitivity analyses are in the WiNGS Planning roadmap available in the 2023 WMP. A programmatic method of determining the PSPS thresholds, which would allow for sensitivity analysis of the PSPS threshold effect on PSPS risk reduction, will be evaluated in conjunction with the sensitivity analyses specified in the roadmap.

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QUESTION 3

On page D-29, SDG&E states that it “is awaiting the final Exponent report to be completed in April 2023 prior to re-evaluating the effectiveness of its Covered Conductor Program.”

- a. Is the Exponent report included in SDG&E’s WMP the “final” Exponent report?
- b. If not, please provide the final Exponent report upon availability.

RESPONSE 3

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 9 and 10. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a. The Exponent report for the study being performed by SDG&E was not included in SDG&E’s WMP.
- b. The report is currently expected to be delivered to SDG&E by the end of May.

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QUESTION 4

On page D-8, SDG&E states that “SDG&E has begun collaborating with RMS, a Moody’s Analytics Company, to model and quantify the impact of long-term duration fires. SDG&E will review RMS’s outputs and will evaluate the inclusion of these outputs in the WiNGS-Planning and WiNGS-Ops models in the 2023 to 2025 WMP cycle.”

When are the results of this analysis expected to be available?

RESPONSE 4

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 9 and 10. Further, the request calls for speculation. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E plans to evaluate the inclusion of these outputs during our 2023 to 2025 WMP cycle and intends to share the progress of the evaluation in the WMP filing each year.

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QUESTION 5

For Ignition Rate Reduction tables (Table 8-29, MGRA-SDGE-2023WMP-02 Response),

- a. when “Ignition Rates” are given are these annual ignition rates or are these ignition rates per the entire measurement period (ex. 2017-2021)?
- b. when “Ignitions Reduced” is given are these annual ignitions or ignitions through the entire measurement period?

RESPONSE 5

- a. Ignition Rates are the average yearly ignitions for the time period between 2017-2021.
- b. Ignitions Reduced represents the number of ignitions that are reduced during the current WMP cycle 2023-2025.

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END OF REQUEST