

**MUSSEY GRADE ROAD DATA REQUEST:
MGRA-SDGE-2023WMP-05
SDG&E RESPONSE**

**Date Received: May 15, 2023
Date Submitted: May 18, 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

2022 Outages

Please provide an Excel spreadsheet summarizing outage causes for 2022:

- a. The first column(s) should indicate the outage cause diagnosed by SCE. Following columns should contain:
- b. The fraction (in percentage) of all outages with the specific cause specified in the first column(s).
- c. The fraction (in percentage) of outages on completely bare wire overhead segments with the specific cause specified in the first column(s).
- d. The fraction (in percentage) of outages on completely covered conductor with the specific cause specified in the first column(s).

Each of columns b, c, and d should total to 100%.

RESPONSE 1

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:

- a. Please see attached file, "MGRA-SDGE-2023WMP-05.xlsx." The values in this column are the outage cause reported by SDG&E, and not SCE as stated in the question.
- b. Please see attached file, "MGRA-SDGE-2023WMP-05.xlsx." The values in this column are the fraction of the outages with this cause code across all outages (both underground and overhead.)
- c. Please see attached file, "MGRA-SDGE-2023WMP-05.xlsx." The values in this column are the fraction of overhead outages with this cause code across all overhead outages. For this request, SDG&E assumes all overhead outages are bare wire outages. SDG&E has approximately 98 miles of covered conductor installed on its system, all of which was installed since 2019. SDG&E has approximately 6,380 total miles of overhead distribution infrastructure which has been in place for decades. SDG&E does not currently separate overhead outages by bare wire and covered conductor due to the small sample size.
- d. Please see response to section c above. SDG&E does not currently separate overhead outages by bare wire and covered conductor due to the inadequate sample size.

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END OF REQUEST