

**ENERGY SAFETY DATA REQUEST: OEIS-SDGE-22-010**

**2022 WMP**

**SDG&E RESPONSE**

**Date Received: May 31, 2022**

**Date Submitted: June 8, 2022**

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**I. 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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**III. RESPONSES**

**QUESTION 1:**

Regarding SDG&E's repair backlog:

- a. Please provide an Excel table with the following information in new columns added to the Excel table SDG&E submitted in response to CALADVOCATES-SDGE-2022 WMP-05<sup>1</sup> Questions 1, 2, and 3:
  - i. Reason for reinspection (if applicable)
  - ii. New due date post-reinspection (if applicable)
  - iii. New prioritization of work order (if it changed)
  - iv. Equipment type
- b. Also provide a process flow chart illustrating the inspection process or a description of the inspection process from identification of an issue through to resolving it, including the typical timescale.
  - i. Include the length of time between identification to initiation of repair and what triggers initiation of the repair.
- c. Additionally, identify any interactions with external agencies, including for permitting, including the following for each agency:
  - i. Any barriers to completing work orders due to permitting.
  - ii. A list of all work orders that have been initiated but have been delayed due to permitting.
  - iii. A list of all work orders for which repair has not been initiated due to permitting concerns.
  - iv. A list of all work orders dated in the past year that have been marked as urgent for which a permit was required.
    - (1) Provide the amount of time that elapsed from the identification of the issue to when it became urgent.
    - (2) Note whether the repair was initiated prior to it being marked as urgent.

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<sup>1</sup> CALADVOCATES-SDGE-2022 WMP-05:  
[https://www.sdge.com/sites/default/files/regulatory/SDGE%20DR05\\_2022CalPA.pdf](https://www.sdge.com/sites/default/files/regulatory/SDGE%20DR05_2022CalPA.pdf) (accessed May 25, 2022).

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**RESPONSE 1:**

***Distribution***

a. See Excel table



1020.A1 - Electric  
Corrective Maintenance

b. Please refer to attached PDF chart ESP 1020.A.1

- i. In sequential sequence, average timelines
  - i. Initiation – 0-1 months
  - ii. Planning – 1-8 months
  - iii. Pre-construction – 8-9 months
  - iv. Construction – 9-12 months

c.

- i. Yes, some projects are delayed to permitting issues.
- ii. List of jobs delayed due to permitting
  - i. 100019077693 – Caltrans permit
  - ii. 100019653641 – Caltrans permit
  - iii. 100019978061 – County of San Diego
  - iv. 100020017673 – Caltrans permit
  - v. 100020241328 – County of San Diego
  - vi. 100020569725 – Caltrans permit
  - vii. 100020569726 – Caltrans permit
  - viii. 100020569727 – Caltrans permit
- iii. List of repairs not initiated due to permitting concerns
  - i. 100019077693 – Caltrans permit
  - ii. 100019653641 – Caltrans permit
  - iii. 100019978061 – County of San Diego
  - iv. 100020017673 – Caltrans permit
  - v. 100020241328 – County of San Diego
  - vi. 100020569725 – Caltrans permit
  - vii. 100020569726 – Caltrans permit
  - viii. 100020569727 – Caltrans permit
- iv. none

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***Transmission***

- a. See excel table and refer to Transmission “Standard\_Practice\_Version\_8d\_12102021” for procedural details also noted in section b of this request.
- b. Please refer to Transmission “Standard\_Practice\_Version\_8d\_12102021” in particular sections 4.3, 5 and 6.5 for procedural details
- c. At various times, transmission projects will require interactions with agencies including but not limited to CalTrans, San Diego County, CAISO, and state and federal environmental agencies. At this time, SDG&E is not experiencing delays to any WMP *transmission* projects due to permitting.

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*Substation*

- a. See Excel table
- b. This process is explained in our standard operating procedure 810.006 - Substation Inspector Maintenance Order Reporting & Tracking.
  - i. 4.1. Procedure for recording corrective maintenance order (CMxO) on Patrol Inspection
    - 4.1.1. The inspector that finds a corrective maintenance item during inspection will open a corrective maintenance ticket in the Substation Maintenance management System (SMMS) (e.g.CASCADE) system. The inspector will record the corrective item and assign a priority code per SOP 510.003 of either Severity 1, restoration within 7 days or Severity 2, restore within 12 months.
    - 4.1.2. The inspector will assign the corrective ticket to the Substation Construction Maintenance (SCM) Scheduler assigned to the equipment.
    - 4.1.3. The inspector will select the Project ID: dropdown CMxO Patrolinsp
    - 4.1.4. The SCM Scheduler assigned the CMxO will schedule the applicable crew to fix the CMxO, the SCM Scheduler will schedule an outage if needed. The SCM Scheduler will schedule the CMxO within the Severity Code time resolution period assigned by the inspector.
    - 4.1.5. The crew will correct the item during the scheduled job. The crew will input any applicable notes in SMMS and close the CMxO
    - 4.1.6. The SCM Scheduler will do a SMMS query every two weeks, just prior to the SCM Compliance and Trouble check meeting, to pull all open CMxO Patrolinsp orders.
    - 4.1.7. Management will review open orders to ensure they are being completed prior to their severity code resolution time period.
- c. Does not apply to substations

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**END OF REQUEST**