

**ENERGY SAFETY DATA REQUEST: OEIS-P-WMP-2024- SDGE-008**  
**SDG&E RESPONSE**

**Date Received: July 23, 2024**  
**Date Submitted: June 26, 2024**

**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.
10. SDG&E objects generally to each request that calls for information that contains trade

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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 Covered Conductor Expenditures (WMP.455):**

In its revised 2025 WMP Update, SDG&E removed its request to increase its 2025 target from 40 to 60 miles for its covered conductor initiative (WMP.455). However, SDG&E still requested the same increase to expenditures for this initiative (capital expenditures increased from \$48,246,000 to \$67,632,000; operations and maintenance expenditures increased from \$592,000 to \$3,090,000).<sup>1</sup> SDG&E justified this change with the same language it used to justify the now removed target change, “expenditures were increased due to a shift in work from 2024 to 2025.”<sup>2</sup> Explain why these expenditures are increasing despite the target returning to its approved number (40). Include explanations for increased expenditures apart from delays in 2024.

**RESPONSE 1**

Following Energy Safety’s change order decision rejecting the 2024 target change from 60 miles to 40 miles, SDG&E attempted to realign the 2025 target to accurately reflect the 3-year cycle target totaling 160 miles of covered conductor. SDG&E reverted the 2025 target back to 40 miles as initially filed and approved in its base WMP to avoid presenting an inflated 3-year target of 180 miles – 60 miles per year for each year of the cycle.

SDG&E expects the covered conductor program to be off track in 2024 and will therefore shift approximately 20 miles of work into 2025 to meet the three-year WMP target. The increase in expenditures reflects this change.

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<sup>1</sup> SDG&E 2025 WMP Update (R2) (redline version, July 5, 2024) Table 6 “Qualifying Changes in Targets and Expenditures (in Thousands),” pp. 20; Table 7 “Qualifying Changes in Expenditures only (in Thousands),” p. 22 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56956&shareable=true>, accessed July 15, 2024).

<sup>2</sup> SDG&E 2025 WMP Update (R2) (redline version, July 5, 2024) p. 24 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56956&shareable=true>, accessed July 15, 2024).

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**QUESTION 2**

**Regarding SDG&E’s Microgrids Expenditures (WMP.462):** In its revised 2025 WMP Update, SDG&E removed its request to increase its 2025 target from 0 to 2 microgrids for its microgrids initiative (WMP.462). However, SDG&E still requested the same increase to expenditures for this initiative (capital expenditures increased from \$0 to \$14,127,000).<sup>3</sup> SDG&E justified this change with the same language it used to justify the now removed target change, “capital expenditures were increased due to a shift in work from 2024 to 2025.”<sup>4</sup> Explain why these expenditures are increasing despite the target returning to its approved number (0). Include explanations for increased expenditures apart from delays in 2024.

**RESPONSE 2**

Following Energy Safety’s change order decision rejecting the 2024 target change from 4 microgrids to 1 microgrid, SDG&E attempted to realign the 2025 target to accurately reflect the 3-year cycle target totaling 4 microgrids. SDG&E reverted the 2025 target back to 0 microgrids as initially filed and approved in its base WMP to avoid presenting an inflated 3-year target of 6 microgrids – 4 microgrids in 2024 and 2 microgrids in 2025. SDG&E has no intention of building 6 microgrids over the 3 years.

The microgrids in place serve to meet PSPS reduction needs. SDG&E expects to complete the renewable generation and energy storage component for one microgrid in 2024 and will therefore shift the remaining microgrids into 2025. The increase in expenditures reflects this change.

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<sup>3</sup> SDG&E 2025 WMP Update (R2) (redline version, July 5, 2024) Table 6 “Qualifying Changes in Targets and Expenditures (in Thousands),” pp. 201; Table 7 “Qualifying Changes in Expenditures only (in Thousands),” p. 22 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56956&shareable=true>, accessed July 15, 2024).

<sup>4</sup> SDG&E 2025 WMP Update (R2) (redline version, July 5, 2024) p. 25 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56956&shareable=true>, accessed July 15, 2024).

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**END OF REQUEST**