

**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALADVOCATES-SDGE-2022 WMP-05  
SDG&E RESPONSE**

**Date Received: February 16, 2022  
Date Submitted: February 22, 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

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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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The following questions relate to your 2022 WMP Update submission.

Please note that the geographical regions are mutually exclusive (i.e., “Other HFTD” excludes areas that are in either Tier 2 or Tier 3).

**QUESTION 1**

Provide an Excel table listing (as rows) all corrective notifications on electric distribution circuits that were open as of February 1, 2022, and located in HFTD areas. The table should include the following information in separate columns.

- a. Notification identification (ID) number
- b. Name of the associated circuit
- c. ID number of the associated circuit
- d. HFTD tier
- e. Geographic latitude in decimal degrees, truncated to seven decimal places
- f. Geographic longitude in decimal degrees, truncated to seven decimal places
- g. Date the notification was originally opened
- h. Priority of the original notification
- i. Due date of the original notification
- j. Date(s) the notification was reinspected or modified, if any
- k. Priority of the notification after it was reinspected or modified, if applicable
- l. Due date of the notification after it was reinspected or modified, if applicable

**RESPONSE 1**

SDG&E objects to Question 1 on the grounds set forth in General Objections 2, 3, and 5. Subject to the foregoing objections, SDG&E responds as follows:

See attached file “SDGE DR05\_2022CalPA.xlsx”. The first seven items were a result of Energy Safety field inspections and were open as of February 1, 2022, but they have all been remediated and were closed by Energy Safety on February 17, 2022.

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**QUESTION 2**

Provide an Excel table listing (as rows) all corrective notifications on electric transmission circuits that were open as of February 1, 2022, and located in HFTD areas. The table should include the following information in separate columns.

- a. Notification identification (ID) number
- b. Name of the associated circuit
- c. ID number of the associated circuit
- d. HFTD tier
- e. Geographic latitude in decimal degrees, truncated to seven decimal places
- f. Geographic longitude in decimal degrees, truncated to seven decimal places
- g. Date the notification was originally opened
- h. Priority of the original notification
- i. Due date of the original notification
- j. Date(s) the notification was reinspected or modified, if any
- k. Priority of the notification after it was reinspected or modified, if applicable
- l. Due date of the notification after it was reinspected or modified, if applicable

**RESPONSE 2**

SDG&E objects to Question 2 on the grounds set forth in General Objections 2, 3, and 5. Subject to the foregoing objections, SDG&E responds as follows:

See attached file “SDGE DR05\_2022CalPA.xlsx”. The data provided is an export of all corrective notifications on electric transmission circuits, including for non-fire conditions. These include conditions involving equipment such as communication wires, aerial lights, and other similar components. The majority of past-due items indicated on the spreadsheet pertain to communication wire, which do not pose a fire condition. SDG&E tracks these communication related corrective notifications until the correction is completed, but the communication infrastructure providers are responsible for performing this work. Similarly, SDG&E has several pole removals that are pending communication wire transfer. The poles have been topped above the communication equipment, and SDG&E is waiting for the communication infrastructure provider to transfer or remove equipment before SDG&E can remove the structure.

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**QUESTION 3**

Provide an Excel table listing (as rows) all corrective notifications on electric substations that were open as of February 1, 2022, and located in HFTD areas. The table should include the following information in separate columns.

- a. Notification identification (ID) number
- b. Name of the associated substation
- c. ID number of the associated substation
- d. HFTD tier
- e. Geographic latitude in decimal degrees, truncated to seven decimal places
- f. Geographic longitude in decimal degrees, truncated to seven decimal places
- g. Date the notification was originally opened
- h. Priority of the original notification
- i. Due date of the original notification
- j. Date(s) the notification was reinspected or modified, if any
- k. Priority of the notification after it was reinspected or modified, if applicable
- l. Due date of the notification after it was reinspected or modified, if applicable

**RESPONSE 3**

SDG&E objects to Question 3 on the grounds set forth in General Objections 2, 3, and 5. Subject to the foregoing objections, SDG&E responds as follows:

See attached file “SDGE DR05\_2022CalPA.xlsx”.

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**END OF REQUEST**