

SPD DATA REQUEST: SPD-SDGE-WMP2026-03
SDG&E RESPONSE

Date Received: 10-06-2025
Date Submitted: 10-30-2025

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

Provide an update to Data Request SPD_WSPS_SDG&E_2024_004 that was submitted to Safety Policy Division on February 4 2025. This update to the WMP Cost Reporting Template should represent values associated with the 2023-2025 Base WMP.

- a. Complete tabs 2 through 4 of the attached spreadsheet IOU WMP Cost Reporting and Account Tracking Template 2025_09.xlsx.
- b. For tabs 2 and 4, complete a data row corresponding for each of the utility mitigation tracking IDs in Table 1 of the QDRs, according to the directions in the spreadsheet and the two attached guidance documents listed below:
 - i. Guidance for WMP Cost Reporting 2025.docx (applicable to tabs 2 and 3)
 - ii. Guidance for Account Tracking 2025.docx (applicable to tab 4)
 - a) When SDG&E completes Step 7 (Column F), it must include the authorized amount in addition to balancing accounts and memorandum accounts. SDG&E must include authorized amounts as is required by Guidance for Account Tracking 2025.docx¹
- c. For each entry in Tab 2, 4 entries will automatically populate into Tab 3, which break out the mitigation initiative by HFTD/non-HFTD, CapEx/OpEx expenditures

RESPONSE 1

SDG&E will provide a response on November 6, excluding Columns S through V and AE through AL of the Accounts Tracking tab. These columns will be provided on December 5.

¹ For additional reference, see the approach used in the SDGE tab of 20240805 SDGE Balancing and Memo Accounts for Wildfire Mitigations Update.xlsx found in SDG&E's response to SPD-SDGE-SB884-003 on August 21 2024.

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QUESTION 2

Complete the WMP Cost Reporting Template with values associated with the 2026-2028 Base WMP.

- a. Complete tabs 2 through 4 of the attached spreadsheet IOU WMP Cost Reporting and Account Tracking Template 2026_09.xlsx.
- b. For tabs 2 and 4, complete a data row corresponding for each of the utility mitigation tracking IDs in Table 1 of the QDRs according to the directions in the spreadsheet and the two attached guidance documents listed below:
 - i. Guidance for WMP Cost Reporting 2026.docx (applicable to tabs 2 and 3)
 - ii. Guidance for Account Tracking 2025.docx (applicable to tab 4)
 - a) When SDG&E completes Step 7 (Column F), it must include the authorized amount in addition to balancing accounts and memorandum accounts. SDG&E must include authorized amounts as is required by Guidance for Account Tracking 2025.docx.²
- c. For each entry in Tab 2, 4 entries will automatically populate into Tab 3, which break out the mitigation initiative by HFTD/non-HFTD, CapEx/OpEx expenditures.
- d. The response to tab 4 should be identical to the response to tab 4 found in the completion of Question 1 of this data request.

RESPONSE 2

SDG&E will provide a response on November 6, excluding Columns S through V and AE through AL of the Accounts Tracking tab. These columns will be provided on December 5.

² For additional reference, see the approach used in the SDGE tab of 20240805 SDGE Balancing and Memo Accounts for Wildfire Mitigations Update.xlsx found in SDG&E's response to SPD-SDGE-SB884-003 on August 21 2024.

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QUESTION 3

When submitting the response to Questions 1 and 2 in this data request, do not manipulate the template provided in the attached Excel files in anyway. This includes, but is not limited to, the following:

- a. Within the Excel files do not hide any rows or make the data in any way difficult for the user to access, view or otherwise utilize.
- b. Do not adjust the formatting.
- c. Do not remove formulas.
- d. Unless otherwise specified above, where information is not available the cell must be left blank and the utility must provide an explanation for the blank in the narrative response to this data request; do not fill in with N/A or any other figure to designate that the information is not available

RESPONSE 3

SDG&E will provide a response on November 6, excluding Columns S through V and AE through AL of the Accounts Tracking tab. These columns will be provided on December 5.

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QUESTION 4

Provide the following summarized WMP cost data for each calendar year from 2020 through 2025. This should be based on logic used in Table 11 of the OEIS Tabular Quarterly Data Report (QDR), and should include any adjustments as reported in the final OEIS annual report on compliance. If a calendar year is not yet reconciled, provide estimates as they would have been provided in Table 11 of the OEIS QDR:

WMP Year	WMP Category ³	Territory Type (HFTD/non-HFTD)	Expense Type (CapEx/OpEx)	Total Expense	Type (Actual/Projected)

RESPONSE 4

See attached spreadsheet titled “SDGE Response SPD-SDGE-WMP2026-03_Q4.xlsx.”

³ The name of the WMP mitigation category, as defined by Energy Safety.

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END OF REQUEST