

**THE UTILITY REFORM NETWORK OFFICE DATA REQUEST:
TURN-SDGE-2023WMP-02
SDG&E RESPONSE**

**Date Received: May 01, 2023
Date Submitted: May 04, 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

Please provide data in SDG&E's possession that indicates the following:

- a. The SAIDI (System Average Interruption Duration Index) for the years 2018-2022 for underground distribution facilities;
- b. The MAIFI (Momentary Average Interruption Frequency Index) for the years 2018-2022 for underground distribution facilities;
- c. The SAIDI (System Average Interruption Duration Index) for the years 2018- 2022 for overhead distribution facilities with covered conductor;
- d. The MAIFI (Momentary Average Interruption Frequency Index) for the years 2018-2022 for overhead distribution facilities with covered conductor;
- e. The SAIDI (System Average Interruption Duration Index) for the years 2018-2022 for overhead distribution facilities without covered conductor;
- f. The MAIFI (Momentary Average Interruption Frequency Index) for the years 2018-2022 for overhead distribution facilities without covered conductor.

RESPONSE 1

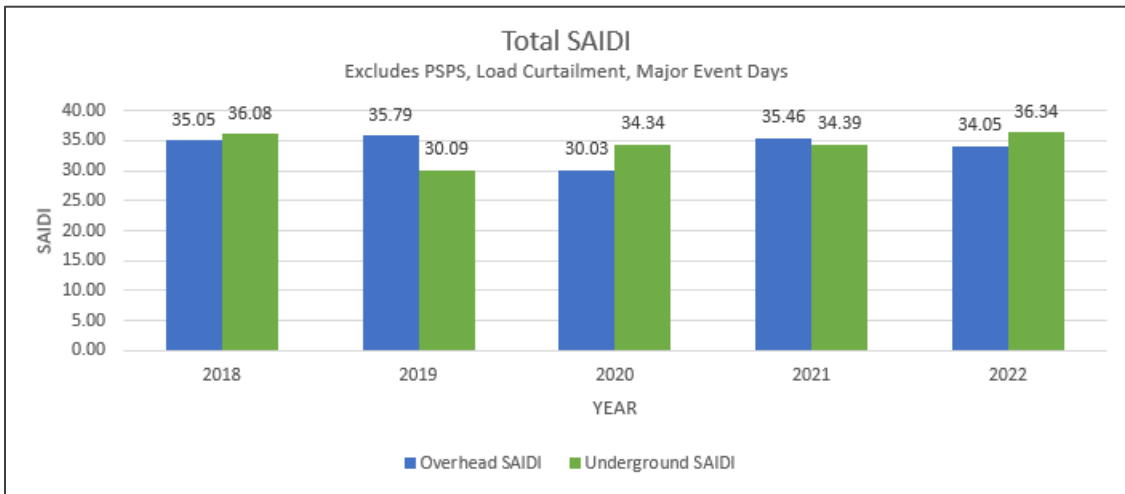
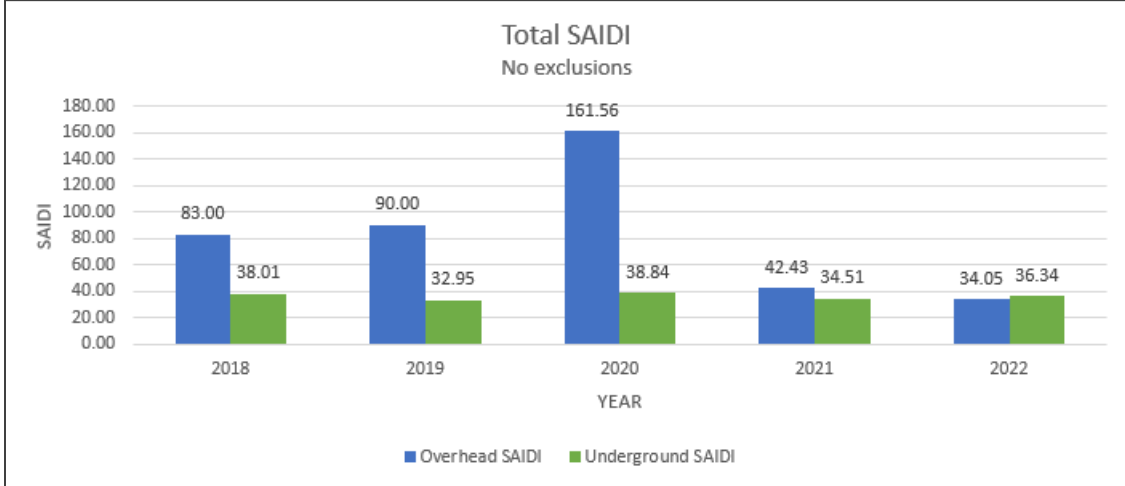
SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 3, 5, and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SAIDI is a systemwide measurement. SDG&E does not calculate SAIDI at a segment level and therefore cannot provide SAIDI or MAIFI for overhead distribution facilities with or without covered conductor separately (c-f). SDG&E has provided SAIDI and MAIFI for underground and overhead facilities in the responses to 1a and 1b below.

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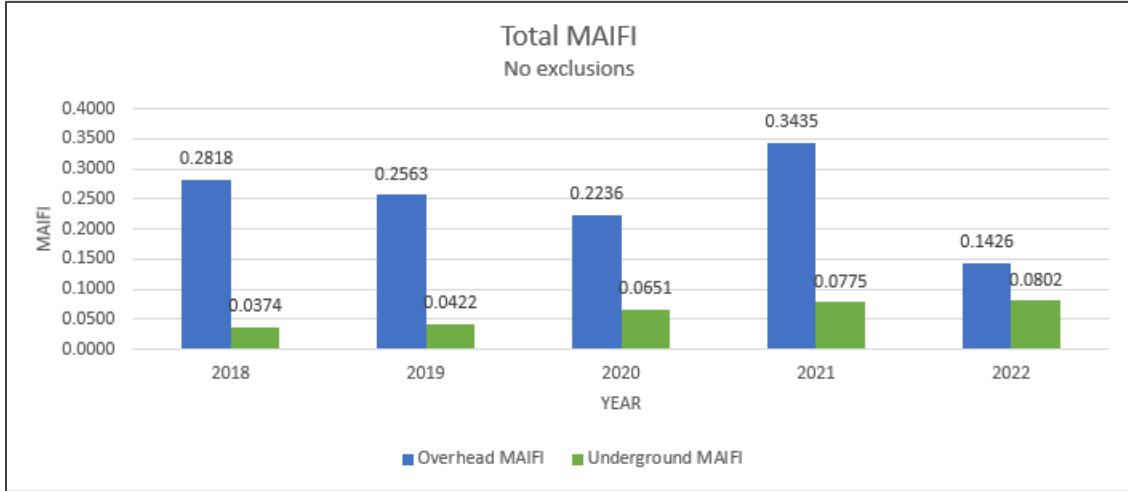
a)



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b)



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QUESTION 2

Please describe any differences, as a general matter, in the reliability of SDG&E's overhead distribution lines without covered conductor, overhead lines with covered conductor, and underground lines, including without limitation a comparison of the frequency of outages and the duration of outages.

RESPONSE 2

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 3, 5, and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

With respect to its WMP initiatives, SDG&E has not performed a reliability analysis of overhead distribution lines without covered conductor, overhead lines with covered conductor, and underground lines. SDG&E's risk analysis to plan wildfire hardening efforts has been focused on risk events (outages that can lead to an ignition) to reduce the risk of wildfire and the impacts of PSPS. As a general matter, as explained in SDG&E's WMP submission, undergrounding electrical infrastructure is the optimal means to reduce PSPS impacts on customers.

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QUESTION 3

Please provide all reports or studies in SDG&E's possession prepared from January 1, 2018 to the present that discuss the reliability of underground distribution facilities, overhead distribution facilities with covered conductor, or overhead distribution facilities without covered conductor, including but not limited to a discussion of frequency of outages, SAIDI data, duration of outages, and MAIFI data.

RESPONSE 3

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 3, 5 and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

With respect to its wildfire mitigation efforts, SDG&E has not performed any studies that discuss the reliability of underground distribution facilities, overhead distribution facilities with covered conductor, or overhead distribution facilities without covered conductor. As a general matter, please see SDG&E's Electric System Reliability Annual Reports located at <https://www.sdge.com/system-reliability> for more information on system reliability.

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END OF REQUEST