

**WILDFIRE SAFETY DIVISION DATA REQUEST: WSD-SDGE-SVM DR01
2020 WMP VEGETATION MANAGEMENT INITIATIVES
SDG&E RESPONSE**

Date Received: April 23, 2021

Date Submitted: May 7, 2021

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

Pursuant to the Wildfire Safety Division’s (WSD) audit of SDG&E’s substantial completion of its 2020 WMP vegetation management initiatives, the WSD requests additional documents and information to validate SDG&E’s completion against 2020 targets for vegetation management initiatives in its 2020 WMP.

Specifically, those initiatives and the associated Request numbers listed below in Table 1:

2020 Initiative Number	Initiative Name	Associated Request #
5.3.5.2	Detailed inspections of vegetation around distribution electric lines and equipment	2
5.3.5.5	Fuel management and reduction of “slash” from VM activities	3
5.3.5.9	Enhanced inspections, patrols and trims	4
5.3.5.16	Removal and remediation of trees with strike potential to electric lines and equipment	5

On December 16, 2020, San Diego Gas & Electric Company (SDG&E) issued a letter notifying the WSD that it had completed a substantial portion of its 2020 Wildfire Mitigation Plan (WMP) vegetation management initiatives. SDG&E stated it has been updating the WSD of its vegetation management progress through its Assembly Bill (AB) 1054 Quarterly Advice Letters on WMP implementation. As of December 31, 2020, SDG&E had completed 99% inspections of its inventory trees.¹

¹ SDG&E’s March 8, 2021 Quarterly Advice Letter Related to Public Utilities Code Section 8389(e)(7), page 7 .

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The following responses were provided by SDG&E subject matter experts with the following titles and departments. Please contact Kellen Gill, Regulatory Business Manager for follow up to ensure your question is routed correctly.

Senior Data Analyst
Wildfire Mitigation & Vegetation Management

Software Component Architect
Utility Ops Applications

Senior Environmental GIS Analyst
Environmental Services

Vegetation Program
Wildfire Mitigation & Vegetation Management

System Forester
Wildfire Mitigation & Vegetation Management

QUESTION 1:

Identify any existing data submissions to the WSD that satisfy any of the Data Requests in this document

SDG&E has provided spatial data to the WSD representing vegetation management inspections and projects completed during 2020. This data includes:

- a) SDG&E's 249,403 unique vegetation management inspections. This number is the sum of unique Vegetation Management Inspection Points reported in the Quarterly Data Reports (QDRs) submitted on September 9, 2020, December 9, 2020, and February 5, 2021.
- b) SDG&E's 40,316 unique vegetation management projects. This number is the sum of unique Vegetation Management Project Points and Vegetation Management Project Polygons reported in the Quarterly Data Reports (QDRs) submitted on September 9, 2020, December 9, 2020, and February 5, 2021.

While this spatial data does not directly correlate to specific initiatives due to the GIS schema SDG&E was provided in 2020, the WSD requests that SDG&E confirm whether the data listed above (and provided to the WSD previously) satisfies completion of any of the initiatives referenced in Table 1 above. If SDG&E has already submitted spatial data to the WSD that can satisfy any of the below Data Requests, SDG&E shall indicate the specific spatial data and WMP initiative combination that the WSD should reference.

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RESPONSE 1:

The GIS data in Quarterly Data Reports (QDRs) submitted by SDG&E to the WSD partially satisfy the below data requests. Differences between the QDRs and initiatives in Table 1 include:

1. The QDR data includes completed **and planned** work in the date range specified for each submission. The data provided for the initiatives referenced in the below requests includes only completed work.
2. The QDR data includes only **routine** work planned or performed as per SDG&E's vegetation management schedule. The data provided for the initiatives below includes both routine and off-cycle work.
3. The QDR data includes **one record** for each group of trees. The numbers provided for the initiatives below are achieved by counting the number of individual tree units [NUMBEROFUNITS] in each record.

The specific spatial data that correlates with the below data as follows:

- a. **5.3.5.2: Detailed inspections of vegetation around distribution electric lines and equipment:** Data for this request is available in the *SDGE_Initiative\SDGE_VegetationManagementInspectionPoint* feature class in the submitted file geodatabase. This feature class contains inspection records for both trees and pole brushes. Tree inspection records include fields specific to trees, such as TreeSpecies, TreeHeight, etc.
- b. **5.3.5.9: Enhanced inspections, patrols, and trims:** Data for this request is available in the *SDGE_Initiative\SDGE_VegetationManagementProjectPoint* feature class in the file geodatabase. This feature class contains tree trimming/removal and pole brushing activity records. Tree trimming and removals can be identified by records that include tree-specific fields such as TreeSpecies, TreeHeight, etc.

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QUESTION 2:

5.3.5.2: Detailed inspections of vegetation around distribution electric lines and equipment

In SDG&E's Q4 2020 Quarterly Advice Letter filed on March 8, 2021, SDG&E reports 99% completion (451,207 of ~455,000 trees) of its 2020 inventory tree inspections, as it pertains to SDG&E's 2020 WMP initiative 5.3.5.2: Detailed inspections of vegetation around distribution electric lines and equipment (initiative 7.3.5.2 in SDG&E's 2021 WMP Update). In this Quarterly Advice Letter, SDG&E stated that the program was complete regarding 2020 program targets.²

In SDG&E's 2021 WMP update, SDG&E reports that 221,500 trees were pruned, and 12,985 trees were removed as it pertains to this initiative.³

- a) Provide the raw data in Microsoft Excel format showing 1 row for each inspection, pruning or tree removal, which supports SDG&E's statements regarding the completion of the following in 2020 for WMP initiative 5.3.5.2:
 - i. 451,207 tree inspections
 - ii. 221,500 tree prunings
 - iii. 12,985 tree removals
- b) Provide a list of all data inputs used to calculate initiative completion, including the source of such data.
- c) Explain what steps SDG&E took to validate the data identified in response to 2(b).
- d) Explain the methodology, including any formulas and assumptions, SDG&E used to calculate initiative completion from the data inputs identified in response to 2(b).

RESPONSE 2:

To be provided Monday, May 10.

² SDG&E's March 8, 2021 Quarterly Advice Letter Related to Public Utilities Code Section 8389(e)(7), page 267.

³ SDG&E's 2021 WMP Update, page 269

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QUESTION 3:

5.3.5.5: Fuel management and reduction of “slash” from vegetation management activities

In SDG&E’s Q4 2020 Quarterly Advice Letter, SDG&E stated that 324/500 (65%) pole vegetation had been thinned, as it pertains to SDG&E’s 2020 WMP initiative 5.3.5.5: Fuels management and reduction of “slash” from vegetation management activities (initiative 7.3.5.5 in SDG&E’s 2021 WMP Update)⁴. In this Quarterly Advice Letter, SDG&E stated that the program was off track for completion of 2020 program targets.⁵ Additionally, in SDG&E’s 2021 WMP update, SDG&E reports that 614 total poles were treated in 2020 with the Fuels Treatment activity for pole brushing and fire-retardant activities, as it pertains to this initiative.⁶

- a) Provide the raw data in Microsoft Excel format showing 1 row for each pole or pole vegetation activity, which supports SDG&E’s statements regarding the completion of the following in 2020 for WMP initiative 5.3.5.5:
 - i. 324 pole vegetation thinned
 - ii. 614 poles treated with Fuels Treatment activity

- b) Provide a list of all data inputs used to calculate initiative completion and the source of such data.

- c) Explain what steps SDG&E took to validate the data identified in response to 3(b).

- d) Explain the methodology, including any formulas and assumptions, SDG&E used to calculate initiative completion from the data inputs identified in response to 3(b).

⁴ SDG&E’s 2021 WMP Update, page 270

⁵ SDG&E’s March 8, 2021 Quarterly Advice Letter Related to Public Utilities Code Section 8389(e)(7)

⁶ SDG&E’s 2021 WMP Update, page 273

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RESPONSE 3:

a) Please see attached Excel file titled, WSD_SDGE_R3 for updated counts of the completion of WMP initiatives 5.3.5.5 and 7.3.5.5.

- i. 328 poles vegetation thinned (poles initially treated in 2020).
- ii. 651 poles treated (poles initially treated in 2020, and poles initially treated in 2019 that were retreated in 2020)

b) FuelsMod_2020_TreatPoles:

[FACID]: Pole IDs
[Work Type]
[DATE_TRTMT_START]
[DATE_TRTMT_COMPL]
[TREAT]: Yes, No

FuelsMod_2020_MaintPoles:

[FACID]: Pole IDs
[Work Type]
[NOTES]: Completed, Do Not Treat, No Work Needed, Unsafe Access

Planned 2020 CPUC:

[FacID]: Pole ID
[Status]: Planned

Fuels modification treatment/maintenance areas were completed each workday. Work completion occurred the same day treatment/maintenance was begun. The completion date for all areas worked was logged.

For the 328 poles initially treated in 2020, the unique Pole ID count of all poles recorded as “Yes” under [TREAT] was used to calculate the total completion count. 323 unique poles were initially treated in 2019 and retreated in 2020. The records of the work activities are in FuelsMod_2020_MaintPoles. Therefore, the total number of poles treated in 2020 is 651. The unique Pole ID count was used to calculate the completion count.

c) Baseline surveys were conducted prior to scheduling treatment/maintenance work to determine accessibility and necessity of vegetation thinning. If poles were not accessible by crews or vegetation thinning was not necessary, the information was logged, and those poles were not treated. After Baseline surveys verified a pole could be worked, the pole was scheduled for treatment/maintenance work. Post surveys were then conducted a few days after treatment/maintenance work to verify and delineate actual treatment/maintenance areas using GPS.

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d)Methods:

FuelsMod_2020_TreatPoles:

Count unique [FACID] when [[TREAT]=Yes

FuelsMod_2020_MaintPoles:

Count unique [FACID] when [NOTES]= Completed

Poles ID from both files were validated to be unique Pole IDs, no duplicates were found.

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QUESTION 4:

5.3.5.9: Enhanced inspections, patrols, and trims

In SDG&E's Q4 2020 Quarterly Advice Letter, SDG&E stated that 17,075/17,000 (100%) of trees had been trimmed or removed, as it pertains to SDG&E's 2020 WMP initiative 5.3.5.9: Enhanced inspections, patrols, and trims (initiative 7.3.5.9 in SDG&E's 2021 WMP Update). In this Quarterly Advice Letter, SDG&E stated that the program was complete regarding 2020 program targets.⁷ Additionally, in SDG&E's 2021 WMP Update, SDG&E reports that approximately 13,000 targeted trees were trimmed to the expanded 20–30-foot clearance range.⁸

- a) Provide the raw data in Microsoft Excel format showing 1 row for each tree, which supports SDG&E's statements regarding the completion of the following in 2020 for WMP initiative 5.3.5.9:
 - i. 17,000 trees trimmed or removed
 - ii. 13,000 trees trimmed to the expanded 20-30 foot clearance range

- b) Provide a list of all data inputs used to calculate initiative completion and the source of such data.

- c) Explain what steps SDG&E took to validate the data identified in response to 4(b).

- d) Explain the methodology, including any formulas and assumptions, SDG&E used to calculate initiative completion from the data inputs identified in response to 4(b).

- e) Confirm whether the 13,000 trees trimmed to the expanded 20-30 foot clearance range are included as part of the 17,000 trees trimmed or in addition to them, as it pertains to 2020 WMP initiative 5.3.5.9.

RESPONSE 4:

To be provided Monday, May 10.

⁷ SDG&E's March 8, 2021 Quarterly Advice Letter Related to Public Utilities Code Section 8389(e)(7), page 276 .

⁸ SDG&E's 2021 WMP Update, page 278

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QUESTION 5:

5.3.5.16: Removal and remediation of trees with strike potential to electric lines and equipment

In SDG&E's 2021 WMP Update, SDG&E stated that it performs hazard tree inspections and abatement in all areas of its service territory where trees pose a potential threat to power lines, as it pertains to SDG&E's 2020 WMP initiative 5.3.5.16: Removal and remediation of trees with strike potential to electric lines and equipment (initiative 7.3.5.16 in SDG&E's 2021 WMP Update). SDG&E also stated that it performs a hazard assessment twice annually of all trees located within the utility strike zone within HFTDs. SDG&E stated it will continue its robust hazard tree inspection and trimming operations in 2021.⁹

- a) Provide the raw data in Microsoft Excel format, supporting SDG&E's statements regarding the completion of 2020 targets for WMP initiative 5.3.5.16.
 - i. Did SDG&E have quantitative targets for 2020 WMP initiative 5.3.5.16? If so, provide those targets. If not, explain what qualitative targets SDG&E used for determining the completion of this initiative.

- b) Provide a list of all data inputs used to calculate initiative completion and the source of such data.

- c) Explain what steps SDG&E took to validate the data identified in response to 5(b).

- d) Explain the methodology, including any formulas and assumptions, SDG&E used to calculate initiative completion from the data inputs identified in response to 5(b). If qualitative targets were used, explain how SDG&E calculated progress and completion of such qualitative targets.

⁹ SDG&E's 2021 WMP Update, pages 282-284

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RESPONSE 5:

a) SDG&E did not have quantitative targets for the hazard tree inspection initiative. Hazard tree assessments are based on factors such as tree condition and status, which cannot be determined until the trees are visually inspected in the field during the scheduled routine and enhanced inspection activities. Completion of the initiative may be determined by confirmation of the scheduled tree inspection activities.

b) Please see attached Excel spreadsheets titled Off Cycle Patrol.xlsx and Scheduling Work Order.xlsx.

c) For 2020, SDG&E tracked completion of the off-cycle hazard tree patrol activity via the contractor's status report; and tracked progress of the routine pre-inspection activity via the Scheduling Work Order completion report in the CityWorks database.

d) SDG&E determines completion of the inspection work activities via completion of the Scheduling Work Order activities. Hazard trees are identified and recorded using specific pre-inspection condition codes and/or using specific work restriction notes within the tree record. During the routine tree inspection activity every inventory tree record is updated. During the off-cycle patrols in the HFTD, only those tree records that require work prior to the next scheduled inspection activity are updated. Any tree coded as a hazard (reliability) tree either by condition code or by work restriction is trimmed and recorded as completed during the routine tree trim activity or the off-cycle trim activity.