

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of San Diego Gas & Electric Company (U902M) for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2016.

Application 14-11-003
(Filed November 14, 2014)

And Related Matter

Application 14-11-004

**FIRST SET OF DATA REQUESTS BY
THE COALITION OF CALIFORNIA UTILITY EMPLOYEES**

The following data requests are submitted by the Coalition of California Utility Employees. Please provide your responses, via email if available, by March 16, 2015 to each of the following people:

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Please identify the person who prepared your responses to each data request. If you have any questions concerning the meaning of any data requests, please let us know.

I. POLES

SDG&E indicates planned pole replacements at numerous places in its testimony (e.g., Ex. 9 workpapers, pp. 311, 756, 789, 856, 868, 876, 884, 913, 923, 933, and others). Please provide the following aggregate information:

1. Please identify how many wood distribution poles are on SDG&E's system as of year-end 2014, in total and by date of installation (e.g., 100 poles installed in 1920, 200 poles installed in 1921, etc).

2. Please identify how many steel distribution poles are on SDG&E's system as of year-end 2014, in total and by date of installation (e.g., 100 poles installed in 1920, 200 poles installed in 1921, etc).

3. Please identify how many other (non-wood, non-steel, e.g. Cellon) distribution poles are on SDG&E's system as of year-end 2014, in total and by date of installation (e.g., 100 poles installed in 1920, 200 poles installed in 1921, etc).

4. To the extent the total number of distribution poles identified in the previous three responses is significantly different from the estimated total pole count of 240,000 in SDG&E's GRC filing, please provide an explanation of the discrepancy.

5. Please identify how many wood transmission poles are on SDG&E's system as of year-end 2014, in total and by date of installation (e.g., 100 poles installed in 1920, 200 poles installed in 1921, etc).

6. Please identify how many steel transmission poles are on SDG&E's system as of year-end 2014, in total and by date of installation (e.g., 100 poles installed in 1920, 200 poles installed in 1921, etc).

7. Please identify how many other (non-wood, non-steel, e.g. Cellon) transmission poles are on SDG&E's system as of year-end 2014, in total and by date of installation (e.g., 100 poles installed in 1920, 200 poles installed in 1921, etc).

8. What percentage of SDG&E's wood transmission poles have distribution underbuild?

9. What was the total number of wood distribution poles replaced, for all causes combined, in each of the years 2009-14, inclusive:

- a. Replaced with wood; and
- b. Replaced with steel.

10. What was the total number of non-wood distribution poles replaced, for all causes combined, in each of the years 2009-14, inclusive.

11. How many, if any, replacements of non-wood distribution poles were wood poles?

12. What was the total number of wood transmission poles replaced, for all causes combined, in each of the years 2009-14, inclusive:

- a. Replaced with wood; and
- b. Replaced with steel.

13. What was the total number of non-wood transmission poles replaced, for all causes combined, in each of the years 2009-14, inclusive.

14. For 2015, how many of each of the following kinds of pole replacements does SDG&E plan, from all causes combined:

- a. Wood distribution poles replaced with wood;
- b. Wood distribution poles replaced with steel;
- c. Steel distribution poles;
- d. Non-wood, non-steel distribution poles;
- e. Wood transmission poles replaced with wood;
- f. Wood transmission poles replaced with steel;
- g. Steel transmission poles; and
- h. Other (please specify).

15. For 2016, how many of each of the following kinds of pole replacements does SDG&E plan, from all causes combined:

- a. Wood distribution poles replaced with wood;
- b. Wood distribution poles replaced with steel;
- c. Steel distribution poles;
- d. Non-wood, non-steel distribution poles;
- e. Wood transmission poles replaced with wood;
- f. Wood transmission poles replaced with steel;
- g. Steel transmission poles; and
- h. Other (please specify).

17. For distribution poles, SDG&E projects an average service life of 47 years (Ex. 28, p. 38). In 2015, to replace 1/47 of its distribution poles, how many poles would SDG&E have to replace that year?

18. For distribution poles, SDG&E projects an average service life of 47 years (Ex. 28, p. 38). In 2015, to replace 1/47 of its distribution poles, how many poles would SDG&E have to replace that year?

19. For distribution poles, SDG&E projects an average service life of 47 years (Ex. 28, p. 38). Please provide, if available, the expected service lives which in the aggregate produce that 47 year life expectation:

- a. Service life for wood poles;
- b. Service life for steel poles; and
- c. Service life for non-wood, non-steel poles.

Dated: March 6, 2015

Respectfully submitted,

/s/

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