



Shivani Sidhar
Regulatory Case Manager
San Diego Gas and Electric Company
8330 Century Park Court
San Diego, CA 92123-1530

July 26, 2016

Sent Via FedEx

A.15-09-010
Wildfire Expense Memorandum Account

Nils Stannik
Office of Ratepayer Advocates
505 Van Ness Avenue, Room 4108
San Francisco, CA 94102

Re: SDG&E First Supplemental Response to ORA Data Request 06 – Wildfire Expense Memorandum Account

Dear Mr. Stannik,

Enclosed please find a thumbdrive containing a complete copy of SDG&E's document production database files, with corrected file compression ratios to enable viewing in Windows. SDG&E is providing these corrected files in response to Request 11 within ORA Data Request 06 (ORA-SDG&E-A.15-09-010-06), dated July 7, 2016.

If you have any questions or require additional information, please feel free to contact me by phone at (858) 637-7914 or e-mail: SSidhar@semprautilities.com.

Sincerely,

Signed

Shivani Sidhar
Regulatory Case Manager

Enclosure

cc: Chris Lyons – SDG&E
Stacie Atkinson – SDG&E
Ed Moldavsky - ORA

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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, statutory mediation confidentiality (see Cal. Evid. Code §§ 1115-28) 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.

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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 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. With respect to the Office of Ratepayer Advocates, however, SDG&E will produce such information subject to the requirements of Public Utilities Code Section 583 and General Order 66-C.

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 (A.15-09-010) and for no other purpose.

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III. RESPONSES

Request 1:

- a. At the time of the 2007 wildfires, did SDG&E's vegetation management program have any scheduling or procedural mechanisms designed to deal with trees that had included bark? If so, please describe and provide appropriate documentation.
- b. At the time of the 2007 wildfires, did SDG&E's vegetation management program have any scheduling or procedural mechanisms designed to deal with trees that had codominant structures? If so, please describe and provide appropriate documentation.
- c. Does SDG&E's current vegetation management program have any scheduling or procedural mechanisms designed to deal with trees that have included bark? If so, please describe and provide appropriate documentation.
- d. Does SDG&E's current vegetation management program have any scheduling or procedural mechanisms designed to deal with trees that have co-dominant structures? If so, please describe and provide appropriate documentation.

Response:

- a. Yes, SDG&E had in place and utilized its "Vegetation Management Tree Pre-Inspection Procedures" to help direct contract inspection personnel on how to identify hazard trees during routine inspections. In section 5 (pages 30 and 31) of the "Vegetation Management Tree Pre-Inspection Procedures", one item on the "Tree Hazard Checklist" asks "*Are there narrow angled branch crotches that may indicate included bark?*". Additionally, the Procedure includes a photo of included bark on page 33, figure 10. The "Vegetation Management Tree Pre-Inspection Procedure" is Appendix 3 to Mr. Akau's prepared direct testimony.
- b. Yes, the checklist referenced in the response to subpart (a) above asks "*Are there multiple vertical branches originating from one point that may indicate weak attachments?*"
- c. Yes, SDG&E continues to utilize the same "Vegetation Management Tree Pre-Inspection Procedure." The practices described above have not changed since 2007. Additionally, SDG&E has made it a requirement for its Pre-inspection and tree trim contractors to provide and document its annual refresher training in hazard tree assessment.

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- d. Yes, SDG&E continues to utilize the same “Vegetation Management Tree Pre-Inspection Procedure.” The practices described above have not changed since 2007. Additionally, SDG&E has made it a requirement for its Pre-inspection and tree trim contractors to provide and document its annual refresher training in hazard tree assessment.

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Request 2:

Prior to the 2007 wildfires, had SDG&E documented complaints, concerns, or doubts concerning the data quality of Remote-Operated Weather Stations (RAWS) as described in Mr. Peterka's testimony? If so, please provide documentation of such concerns.

Objection: SDG&E objects to this request on the grounds set forth in General Objection 2. Subject to the foregoing objection, SDG&E responds as follows.

Response:

SDG&E is unaware of any documented complaints, concerns, or doubts concerning the data quality of RAWS prior to 2007.

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Request 3:

Please describe:

- a. The data sources SDG&E relied on in its weather monitoring and recording practices prior to the 2007 wildfires;
- b. To what extent the weather monitoring and recording practices in part (a) used data provided by the RAWS described in Mr. Peterka's testimony;
- c. How long SDG&E had been relying on data from the RAWS described in Mr. Peterka's testimony; and
- d. What data source(s) SDG&E relied on prior to using RAWS data, if any.

Response:

- a. Any operational measures by SDG&E prior to the 2007 wildfires were based primarily on the National Weather Service (NWS) Red Flag Warning system or other information provided by NWS. CALFIRE disseminated the proclamations, but the source data was from NWS. Within SDG&E, Grid Control had the lead for sharing the information and initiating any proactive measures taken by the company.
- b. Any operational measures by SDG&E were based on NWS data or information which may have included RAWS data within its content, but SDG&E used RAWS specific data only in a cursory or informational way to broaden scope of understanding of a given weather scenario. No proactive measures were based on a pre-determined criteria measured at a RAWS.
- c. SDG&E did not rely on RAWS data.
- d. See responses to subparts (a)-(c).

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Request 4:

Regarding attachment “Peak Wind Gusts,” provided in response to ORA data request DR-02 (dated April 29, 2016):

- a. Please provide similar wind data for the Julian RAWS station.
- b. Please provide similar wind data for the following dates and weather stations:
 - Dates: February 10, 2002; January 8, 2003; June 3 – 12, 2008; and March 29, 2003
 - Weather stations: Julian, Ramona Airport, Pine Hills, Goose Valley, and Valley Center.
- c. Why is the BOC station listed twice? What do the differing data values for the two BOC entries represent?

Objection: SDG&E objects to this request on the grounds set forth in General Objections 2, 5, 7, 8 and 9. Subject to the foregoing objection, SDG&E responds as follows.

Response:

- a. See attachment "JULC1 Peak Wind Gust"
- b. The data ORA requests is not archived at SDG&E but is publicly available through <http://mesowest.utah.edu/>
- c. There was a typo in the original attachment. The station listed as BOC in column D should actually be BMS. The weather data under the column is correct. See corrected attachment provided herewith, entitled “Corrected_Peak Wind Gusts_072116.”

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Request 5:

Regarding attachment “SDGE_170WeatherStations_06152016,” provided in response to ORA data request DR-05 (dated June 24, 2016):

- a. Please explain why the installation dates for the five stations analyzed by Mr. Peterka (Julian, Ramona Airport, Pine Hills, Goose Valley, and Valley Center) are after 2007.
- b. Have the five stations listed in part (a) above been moved, relocated, or replaced at any time since 2007? If so, please explain and provide dates corresponding to any changes made to the stations.
- c. Did any of the other provided wind stations in the attachment exist before the 2007 wildfires? If so, please provide the original installation dates and dates of all subsequent and substantive changes to the wind stations.
- d. Does the listed station “Ramona” (code “RAM”) describe the Ramona Airport, as analyzed within Mr. Peterka’s testimony?

Objection: SDG&E objects to this request on the grounds set forth in General Objections 5 and 8. Subject to the foregoing objection, SDG&E responds as follows.

Response:

- a. The stations listed in the attachment “SDGE_170WeatherStations_06152016” represent SDG&E-owned weather stations that were installed after the 2007 wildfires. In his prepared direct testimony, Mr. Peterka analyzed the pre-existing, federally-owned RAWS stations. NOTE: Ramona Airport is not a RAWS but is actually an ASOS with different instrumentation and installation specifications.
- b. The Federally-owned Goose Valley RAWS was relocated by the USFS sometime in late 2012 or early 2013. ORA should contact the U.S. Forest Service for exact dates. SDG&E is unaware of any other changes to these five federally-owned weather stations. Again, these stations are not owned or operated by SDG&E and are not included in the list of 170 SDG&E weather stations.
- c. None of the weather stations in the attachment existed before the 2007 wildfires.
- d. No.

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Request 6:

Has SDG&E performed any internal investigation into the cause of the Witch, Rice, or Guejito fires? If so, please provide these investigations, including any related documentation.

Objection: SDG&E objects to this request on the grounds set forth in General Objections 1, 2, 3, and 9. Subject to the foregoing objection, SDG&E responds as follows.

Response:

SDG&E's internal investigation into the cause of the Witch, Rice, or Guejito fires is privileged. All non-privileged data collected during the parties various joint inspections of the Witch, Rice or Guejito facilities is contained on a hard-drive previously provided to the ORA in response to ORA-SDG&E DR-02. In addition, information related to the cause of the fires may be found in SDG&E's responses to various CPUC data requests, its OII testimony, litigation discovery, and testimony in this proceeding, which are in the possession of the Commission's Safety Enforcement and Division (formerly Consumer Protection and Safety Division), or ORA.

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Request 7:

In the folder SDGE PRODS\NATIVES\001 on the hard drive provided in response to ORA data request ORA-02, file **SDGE0214266_TRWITCH.mdb** appears to have many blank tables, including those regarding clearance violations and conductors.

Please explain why these tables were left blank. If these tables were left blank in error, please provide the indicated information.

Response:

SDG&E0214266 is a native copy of a database also produced in .pdf at SDGE0214267. The blank tables in SDG&E0214266 are not an error and are representative of the original database.

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Request 8:

In the folder SDGE PRODS\IMAGES\004, the SDG&E Fire Conditions document dated 09/03/08 (starting with file SDGE0024129.tif) includes procedures regarding transmission and distribution lines related to tripping that occurs during a Red Flag Warning.

- a. Were these procedures in effect prior to the effective date of September 3, 2008?
- b. Were these procedures in effect during the 2007 wildfires?
- c. If these procedures were not in effect during October 2007, were there any other procedures for dealing with tripping wires during a Red Flag Warning? If so, do these procedures differ from the procedures on a day in which no Red Flag Warning is in effect?

Response:

As set forth in SDG&E's response to Request 2 in ORA-SDG&E DR-05, TMC 1320 and ESP 109 set forth procedures relating to Red Flag Warning periods for transmission and distribution, respectively. The versions of TMC 1320 and ESP 109 in effect at the time of the fires were previously provided in response to Request 2.

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Request 9:

Regarding attachment "TMC1320" (Hazardous Fire Conditions - Red Flag Fire Warning) provided in response to ORA data request DR-05:

- a. Which personnel are currently included on the "Fire Warning" distribution list" (p. 4)? Please provide a list of all persons and their corresponding titles.
- b. Who was included on the "Fire Warning" distribution list" during October 2007? Please provide a list of all persons and their corresponding titles.
- c. Please provide all notifications sent via the SDG&E web-based Pager System related to Red Flag Fire Warnings, including around the time of the 2003 wildfire, the 2007 wildfires, and all dates corresponding to the Santa Ana conditions provided in response to ORA data request DR-05, Question 5.
- d. Who is included in the "Fleet Wide Call" (p. 6)? Who was included during October 2007? Please provide a list of all persons and their corresponding titles.
- e. Please provide any documentation related to any Fleet Wide Calls made regarding the Red Flag Fire Warnings, including around the time of the 2003 wildfire, the 2007 wildfires, and any dates correlating to the Santa Ana conditions provided in response to ORA data request DR-05, Question 5.

Objection: SDG&E objects to this request on the grounds set forth in General Objections 2, 5 and 9. Subject to the foregoing objections, SDG&E responds as follows.

Response:

SDG&E will respond to this request by July 28, 2016 or will indicate by that date when it expects to respond.

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Request 10:

Within various subfolders of SDGE PRODS\IMAGES on the hard drive provided in response to ORA data request ORA-02, the following files appear to be blank:

- In folders 004, 005, and 006, images **SDGE0098983.tif** through **SDGE0109113.tif**
- In folder 007, images **SDGE0109114.tif** to **SDGE0110159.tif**

Please provide non-blank versions of these files. If non-blank versions are not available, please explain why.

Response:

SDGE0098983.tif through SDGE0109113.tif and SDGE0109114.tif to SDGE0110159.tif were placeholders for documents not ultimately produced in the underlying litigation and are not responsive to data requests in this proceeding.

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Request 11:

In the folder **SDGE PRODS\IMAGES** on the hard drive provided in response to ORA data request ORA-02, there are many files that appear to be either corrupt or broken, including, for example, **SDGE0026546** and **SDGE0098834** (subfolder 004) and **SDGE0111922** and **SDGE0112071** (subfolder 007). Please provide uncorrupt versions of these and any additional corrupted files.

Response:

Having investigated this issue, it is SDG&E's understanding that the files identified may appear corrupt when opened outside a specific database. SDG&E has corrected the compression ratio to enable viewing with Windows and is providing them via thumb drive enclosed with this supplemental response.

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Request 12:

Regarding photos **SDGE0247128_DL_IMG_0104_edited-1.jpg** through **SDGE0247139_DL_IMG_0115_edited-1.jpg** in folder SDGE PRODS\NATIVES\001 on the hard drive provided in response to ORA data request ORA-02:

- a. Please describe which part of ORA's second data request these files are in response to (question number, sub-question).
- b. Please provide the location and additional background information regarding these pictures. If none is available, please state as such.
- c. Please describe why ten of the twelve listed files contain "edited-1" in their filename. If unedited versions of these files exist, please provide.

Objection: SDG&E objects to this request on the grounds set forth in General Objection 5. Subject to the foregoing objection, SDG&E responds as follows.

Response:

SDGE0247128_DL_IMG_0104_edited-1.jpg through SDGE0247139_DL_IMG_0115_edited-1.jpg were files produced in the underlying civil litigation related to the Witch, Rice and Guejito Fires. Background information regarding the photographs can be found in the metadata. SDG&E understands the photographs were taken at the alleged area of origin of the Witch fire. SDG&E understands the photos identified were edited by the photographer, Dean LeBrecht. Mr. LeBrecht discussed his practice regarding editing photographs in his deposition dated March 25, 2010 starting at 175:7.