



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

August 9, 2016

Sent Via Electronic Mail

A.15-09-010
Wildfire Expense Memorandum Account

Ms. Diane Conklin
Mussey Grade Road Alliance
PO Box 683
Ramona, CA 92065

Re: SDG&E Response to MGRA Data Request 02 - WEMA

Dear Ms. Conklin:

Attached please find SDG&E's response to MGRA Data Request 02 (MGRA-SDG&E-A.15-09-010-02), dated July 26, 2016. SDG&E's response includes general objections and narrative responses.

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

Enclosures

cc: Chris Lyons – SDG&E
Stacie Atkinson – SDG&E

MGRA DATA REQUEST
MGRA-SDG&E DR-02, Q14-20
SDG&E WEMA PROCEEDING - A.15-09-010
SDG&E RESPONSE
DATE RECEIVED: July 26, 2016
DATE RESPONDED: August 9, 2016

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 14:

Related to the testimony of Steve Vanderberg;

Please provide a full description of the characteristics of the anemometers making up the SDG&E mesonet, including make and model. Specifically include a description of the algorithms used to calculate both gust and average wind speeds, including sampling frequency, length of sample, and frequency of data transmission.

Response:

SDG&E uses an RM Young anemometer model 05103 mounted at a height of 20 feet above ground level. Data is transmitted every 10 minutes. Wind speed is measured every 3 seconds. The reported sustained wind speed is the average of all 200 wind speed measurements during the previous 10 minutes. The reported wind gust is the highest measured 3-second wind speed during the previous 10 minutes.

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Request 15:

Related to the testimony of Steve Vanderberg;

Please provide the exact geographic coordinates for the SDG&E weather station at West Santa Ysabel (WSY).

Response:

See SDG&E's response to ORA-SDG&E DR-05, Request 3.

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Request 16:

Related to the testimony of Steve Vanderberg;

[a] In reference to SDG&E's response to question MGRA-3, elaborate on the finest scale over which SDG&E expects geographic and topographical features to influence wind speed measurements during Santa Ana wind events. [b] Does SDG&E observe significantly different wind measurements from weather stations that are close to each other during Santa Ana events? [c] Based on SDG&E's analysis of wind data in Eastern San Diego County, what is the largest distance scale over which variations between wind measurements at two points can be expected to vary significantly? [d] How close do measurement points need to be to each other in order to guarantee that wind speed measurements at those points will be approximately equal to each other, and how much would they be expected to vary from each other?

Objection: SDG&E objects to this request on the grounds set forth in General Objections 2, 3, 5 and 9. Please note that SDG&E has separated the original request into subparts (a) through (d) since the request contained multiple, separate questions. Subject to the foregoing objections, SDG&E responds as follows.

Response:

- a. The answer to this question depends on the location where the wind speed measurements are being made, and could vary from location to location.
- b. The answer to this question depends on which weather station(s) MGRA is referring to, which are not specified in the question, nor is the term "significantly" explained.
- c. See responses to subparts (a) and (b).
- d. See responses to subparts (a) and (b). In addition, SDG&E does not understand what MGRA means by "approximately equal" and does not know how to answer the second part of the question.

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Request 17:

Related to the testimony of Steve Vanderberg;

In regard to the SDG&E response to MGRA-11, which states: “The Santa Ana Wildfire Threat Index measures the probability that an ignition will go beyond initial attack and become a large fire (250+ acres).”: Please give the calibration between the Santa Ana Wildfire Threat Index that demonstrates the relationship between the index and ignition probability for 250+ acre fires, where probability is defined by a standard probability scale of 0-100%. Provide all calculations and references required to support this calibration.

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

Response:

Below is a summary of the results for San Diego County, using data provided by the U.S. Forest Service.

Zone 3	No Rating	Marginal	Moderate	High	Extreme
LFP - Final	< 10	10-16	17-24	25-35	> 36
Number of Fire Days	3777	35	14	4	5
Number of Large Fire Days	118	5	4	1	3
	3%	14%	29%	25%	60%

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Request 18:

Related to the testimony of Gerry Akin in the proceeding I.08-11-006;

The June 9, 2009 testimony of Gerry Akin in the proceeding I.08-11-006 states that the transmission span between Z4616675 and Z416676 was built to withstand wind speeds of 56 mph. Prior to 2007, did SDG&E conduct a failure analysis on conductors or rely on any third party analysis to estimate the pole, conductor, or cross-arm failure rates at wind speeds higher than 56 mph?

Response:

Prior to 2007 SDG&E conducted a structural analysis that was performed using a deterministic analysis as dictated by General Order 95 (GO 95) Section IV, Rule 44. The deterministic analysis takes the breaking strength of a material as provided by a manufacturer, divided by load being imparted by wind and other factors, and checks that the value is greater than the minimum safety factor as dictated in GO 95. Based on this deterministic analysis, the pole, conductor or cross-arm either passes or fails the calculation.

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Request 19:

Related to the testimony of Gerry Akin in the proceeding I.08-11-006;

Using methods applicable at the time of the 2007 fires, please calculate the expected failure rates of conductors, poles and crossarms using the configuration of Z4616675 and Z416676 and its spanning conductors as it was in October 2007, using peak wind speeds of 60 mph, 70 mph, 80 mph and 90 mph.

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

Response:

See response to Request 18 above.

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Request 20:

Related to the testimony of Gerry Akin in the proceeding I.08-11-006;

Please calculate the approximate number of SDG&E transmission and distribution poles that are within 10 miles east of a line determined by the maximum elevation of San Diego County on a north-south axis, and additionally lie within SDG&E's Fire Threat Zone.

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

Response:

6811 poles with distribution and 636 poles with transmission.