



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

September 6, 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 04 -WEMA

Dear Ms. Conklin:

Attached please find SDG&E's response to MGRA Data Request 04 (MGRA-SDG&E-A.15-09-010-04), dated August 22, 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-04, Q25-27
SDG&E WEMA PROCEEDING - A.15-09-010
SDG&E RESPONSE
DATE RECEIVED: August 22, 2016
DATE RESPONDED: September 06, 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 25:

Based on SDG&E's knowledge of the wind conditions in the territory covered by its weather stations, would you expect that there will be locations where variations in wind speed of >30% could occur between two locations within ½ mile of each other?

Objection: SDG&E objects to this request on the grounds that MGRA claims that the response to Request MGRA-16 "was incomplete." SDG&E fully responded to that request. Subject to the foregoing objection, SDG&E responds as follows.

Response: Yes.

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Request 26:

Based on SDG&E's knowledge of the wind conditions in the territory covered by its weather stations, would you expect that there will be locations where variations in wind speed of >50% could occur between two locations within ½ mile of each other?

Objection: SDG&E objects to this request on the grounds that MGRA claims that the response to Request MGRA-16 "was incomplete." SDG&E fully responded to that request. Subject to the foregoing objection, SDG&E responds as follows.

Response: Yes.

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Request 27:

The following question is intended to provide general geographic information related to the engineering study performed in preparation for construction of Southwest Powerlink provided in response to MGRA-21. The goal of this request is to provide publicly disclosable information and protect sensitive information.

In reference to SDG&E's response to MGRA-21, a table of expected 50-year wind speeds was provided that references specific tower numbers (pp. SDGE0300538 to SDGE300547). Please provide in response to this data request an excel spreadsheet containing a table of the following form: SWPL mile # Estimated 50 year wind speed at nearest tower SWPL mile number should start at 0 at the San Miguel substation and run to the Imperial Valley substation. The estimated 50 year wind speed should be the from the tower location in the table of wind speeds that is closest to the specified mile marker.

Objection: SDG&E objects to this request on the grounds set forth in General Objections 1, 3, 5, 8 and 9.