



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

August 18, 2016

Sent Via Electronic Mail and 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 Response to ORA Data Request 08 – Wildfire Expense Memorandum Account

Dear Mr. Stannik,

Attached please find SDG&E's response to ORA Data Request 08 (ORA-SDG&E-A.15-09-010-08), dated August 4, 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
Ed Moldavsky - ORA

ORA DATA REQUEST
ORA-SDG&E DR-08, Q1-6
SDG&E WEMA PROCEEDING - A.15-09-010
SDG&E RESPONSE
DATE RECEIVED: August 4, 2016
DATE RESPONDED: August 18, 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 1:

Question 3 of ORA data request ORA-SDG&E-A.15-09-010-03 (DR-03) contained 4 components asking about SDG&E's vegetation management practices.

- a. It is ORA's understanding that the quoted section of Mr. Akau's testimony and SDG&E's responses describe SDG&E's current practices. Is this understanding correct?
- b. Are there any differences between SDG&E's description (in Mr. Akau's testimony, Section III, pages 3-16) of current practices and the practices in place in October 2007? If so, please describe.
- c. Are there any differences between SDG&E's description (in response to DR-03, Question 3) of current practices and the practices in place in October 2007? If so, please describe.

Response:

- a. Yes.
- b. No.
- c. The practices described in the referenced response remain in place. Additionally, SDG&E performs off-cycle inspections in the company's defined highest risk fire areas (HFRA), as well as off-cycle patrols of certain vegetation species (bamboo, century plants). To the extent unsafe clearances may exist, as determined in the off-cycle inspection, an order to clear vegetation is issued and trimming is completed prior to September 1 of each year. See also SDG&E's response to ORA-SDG&E DR-09, Request 4.

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Request 2:

In response to ORA DR-03, Question 3, part (c), SDG&E stated:

“If QA finds issues in the VMA during the Pre-inspection audit, the auditor will make the necessary corrections and provide the final results to SDG&E. Pre-inspection audits do not hold up the release of the tree trimming work.”

- a. It is ORA’s understanding that “hold up the release of tree trimming work” is given to mean causing a delaying beyond normal practices/schedules if discrepancies are found during the course of the audit. Is this understanding correct?
- b. Under SDG&E’s current practices, do tree trims happen concurrently with or following the quality assurance audit of the pre-trim inspection?
- c. Prior to the 2007 wildfires, did tree trims happen concurrently with or following the quality assurance audit of the pre-trim inspection?
- d. Under SDG&E’s current practices, under what conditions could a tree recommended for trimming be trimmed prior to or concurrent with the pre-trim quality assurance audit?
- e. Prior to the 2007 wildfires, under what conditions could a tree recommended for trimming be trimmed prior to or concurrent with the pre-trim quality assurance audit?

Response:

- a. Yes. The audit does not hold up the release of the tree trimming work. If an auditor finds compliance issues, contractors are dispatched to perform the work, and the VMA is then completed and released.
- b. Following.
- c. Following.
- d. If an auditor finds compliance issues, or a hazard condition is observed, a memo is issued to the contractor to immediately correct the condition.
- e. The response to this subpart is the same as the response to subpart (d) above.

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Request 3:

Please provide the precise time that of the trim of tree FF1090 occurred on October 22, 2007.

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:

SDG&E does not know the precise time that the trim occurred on October 22, 2007, but it believes that the tree trim contractor arrived at the site to begin timming work at approximately 11:30 am and undertook the work thereafter.

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Request 4:

At the time of the trim of tree FF1090 on October 22, 2007:

- a. Was a Red Flag Warning in effect?
- b. Was the area considered at risk for further ignition or re-ignition?
- c. Were any firefighting actions taking place in the immediate vicinity?
- d. Were any CPUC representatives present?
- e. Were any CalFire representatives present?

Response:

- a. Yes.
- b. Yes. The downed power lines were de-energized, but there was existing vegetation in the area that had not burned, and a shift in winds thus could have brought additional fire to that area. In addition, as described on pp. 15-16 of the June 5, 2009 "Direct Testimony of Don Akau, San Diego Gas & Electric Company (Rice Fire)" in I.08-11-006, tree FF1090 was trimmed to make the area safe for fire crews, residents in the area, and for electrical crews that would begin restoration of service.
- c. Yes.
- d. SDG&E does not believe that there were CPUC representatives present.
- e. SDG&E does not know whether any CalFire representatives were present at this time.

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Request 5:

When were the 12kV conductors between pole #112340 and pole #213072:

- a. First de-energized on October 22, 2007?
- b. Last de-energized on October 22, 2007 (if more than one occurrence)?
- c. Re-energized after reinstallation?

Response:

- a. 4:17 am.
- b. See response to subpart (a) above.
- c. 1:43 pm on November 5, 2007.

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Request 6:

When were the conductors between pole #112340 and pole #213072 re-installed after the Rice Fire? When were the conductors between pole #112340 and pole #213072 put back into service after the Rice Fire?

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: Records indicate that repairs were made on October 24 and October 31, 2007. The line was re-energized on November 5, 2007.