



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

September 8, 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 13 – Wildfire Expense Memorandum Account**

Dear Mr. Stannik,

Attached please find SDG&E's response to ORA Data Request 13 (ORA-SDG&E-A.15-09-010-13), dated August 24, 2016. SDG&E's response includes general objections, narrative responses and attachments.

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](mailto: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-13, Q1-3  
SDG&E WEMA PROCEEDING - A.15-09-010  
SDG&E RESPONSE  
DATE RECEIVED: August 24, 2016  
DATE RESPONDED: September 8, 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:**

- a. At the time of the 2007 wildfires, what person(s) or department was/were responsible for scheduling the reinstallation of the facilities associated with the ignition of the Rice Fire after repair work was completed?
- b. When was the repair work that was completed on October 24, 2007 and October 31, 2007 on the facilities described in part (a) above scheduled?
- c. When was the re-energization (of the facilities described in part (a) above) scheduled?

**Objection:** SDG&E objects to this request on the grounds set forth in General Objection 5.

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**Request 2:**

- a. Please provide the results (and any associated documents or workpapers) of the preinspection audit of the tree-trimming work that would have included tree FF1090 in October – November 2007.
- b. If not apparent in the documents provided in response to part (a) above, please provide the audit due date according to SDG&E’s vegetation management schedule, including the actual begin date of the audit and the actual end date of the audit.

**Response:**

- a. See attached “Auditor Summary Report and Certification of Audit Performed.pdf.” Also attached is a listing of the 471 record IDs for the VMA 379 audit work release (see attached “Audit Work Release Tree IDs (VMA 379)”. FF1090 (which is within VMA 379) is not included in this spreadsheet because it was not randomly selected for the audit.
- b. As stated within the Auditor Summary Report and Certification of Audit Performed document, the audit start date was August 14, 2007, and the audit end date was August 22, 2007.

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**DATE RECEIVED: August 24, 2016**  
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**Request 3:**

Please provide the most recent version of TMC1320 (AKA: DOP3013, ESP109), or a confirmation of the most recent version number/date if these documents are already in ORA's possession. If TMC1320 has been superseded by another document or set of procedures, please provide:

- a. The date that TMC1320 was replaced by the new document/procedures;
- b. The most recent version of TMC1320 before it was superseded; and
- c. The name and most recent version of the replacing document.

**Response:**

The most recent version of TMC1320 is in ORA's possession. This document was included on the removable hard drive SDG&E produced in response to ORA-SDG&E DR-02 and within SDG&E's Second Supplemental Response to ORA-SDG&E DR-06. The effective date is 04/15/15 and the document number is TMC1320 (AKA: DOP3013, ESP109).

Attachment: Auditor Summary Report and Certification of Audit Performed

## Auditor Summary Report and Certification of Audit Performed

VMA 379 was audited looking at Pre-inspection. This was a random sampling of PI contractors work.  
 I DAVID FRASUA certify this audit to be an accurate representation of the VMA I just surveyed.

Signature: David Frasca Date: 8/1 Contractor Audited: Davey Resource Group

Audit Type:  Pre-inspection;  Routine;  Patrol;  Other;

### VMA Audit Information (This is the entire audit tree counts)

Audit Start	Audit End	Total Audit Hours (this includes write up)	Total Trees	Total Trees Audited	Total Records Failed	# Fails Overturned
8/14/07	8/22/07	52	...	461	2	0

Inspection fails	# of 30 day M/C trims
0	

#### Failed Tree(s) ID's:

NON-AUDIT per Rob Zocco

ON4664 ✓		DY590
QJ1590 ✓		DY616
		DY631
		EP2191
		FF618
		ON4798
		PB1067
		PR5903
		PR5965
		RW863

Time Line Flow	
Certification	_____
To Auditor	8-14-07
Completed	8-22-07
Data Entry	SEP 18 2007
To Contractor	SEP 18 2007

#### Auditor Comments/ Overview of the Vegetation Management Area Audited:

CHECKED PRE-INSPECTION WORK BY CONTRACTOR. OVERALL GOOD JOB BY CONTRACTOR. NO MAJOR TRENDS OR CONCERNS IN VMA. GOOD CALLS MADE ON LC & LT TRIMS. ALSO GOOD INFORMATION OBTAIN ON TREES (CUSTOMERS, POLE, DBH-ETC.) ONLY 2 FAILS FOUND - 1 COMPLIANCE LC → LT, 1 QUALITY - INCORRECT DBH. AS STATED THOUGH - GOOD JOB BY CONTRACTOR.

\* 10 UNVISITED TREES - 870 STEWART CYN RD. - SENSITIVE CUSTOMER - OK PER ROB ZOLLO NOT TO AUDIT PROPERTY.

#### Supplemental Auditor information found during audit: (Use if Needed)

Memos Called In	Number of Non Compliant Trees	Lister F/U's:	Reliability Trees:

<p>(For Audit Supervisor Only)</p> <p>Field Issued: _____</p> <p>Field Returned: _____</p> <p>Supervisor Field Date(s): _____</p> <p>Fails Verified by/Date: _____</p>	<p>(For Audit Team Lead Only)</p> <p>Audit: _____</p> <p>AF: Michael Daleo</p> <p>Special Requests: _____</p> <p>Issued into Field: TO DRG Lead 8/23/07</p>
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# PRE-INSPECTION AUDIT RESULTS FOR VMA 379 - Rainbow 1

RANDOM AUDIT SAMPLE POPULATION: 471 SAMPLE PERCENTAGE: 15.01% COMPLIANCE PERCENTAGE: 100.00% QUALITY PERCENTAGE: 99.79%

CONTRACTOR: Davey Resource Group AUDIT COMPLETION DATE: 08/24/2007

AUDIT	PIC CODES			PIQ CODES														ADDED	REMARKS	LISTER				
TREE ID #	1	2	3	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	TREE		
QJ1590						3																	Incorrect DBH	Fiss, Carl
ON4664		2																					Missed Tree LC Should be LT	Fiss, Carl

**PRE INSPECTION COMPLIANCE CODES:**

- 1: MISSED TREE NON-INVENTORY
- 2: MISSED TREE LC SHOULD BE LT
- 3: MISSED TREE: MEMO

**PRE INSPECTION QUALITY ASSURANCE CODES:**

- 1: INCORRECT SPECIES
- 2: INCORRECT HEIGHT
- 3: INCORRECT DBH
- 4: INCORRECT GROWTH RATE
- 5: INCORRECT NUMBER OF UNITS
- 6: INCORRECT STATUS OF LT
- 7: INCORRECT CLEARANCE
- 8: INCORRECT MONTH NEXT TRIM
- 9: INCORRECT ACCESS
- 10: INCORRECT VOLTAGE
- 11: INCORRECT TREE-POLE NOTES
- 12: INCORRECT ADDRESS-STREET
- 13: INCORRECT CITY-ZIP
- 14: INCORRECT PROPERTY OWNERSHIP
- 15: INCORRECT POLE NUMBERS
- 16: INCORRECT LOCATION NOTES
- 17: INCORRECT CUSTOMER INFORMATIO
- 18: NON INVENTORY LC

**AUDITOR COMMENTS:**

# SDGE POST Pre-Inspection AUDIT / Inspection Fails

VMA # 3179  
 Inspector DAVID FAASUA  
 Date 8/17/07

Tree ID	TB PG #	Street Address	Species	Poles	Clear	Trim Type	Owner	Crew Type	# of Trees	Comments
DN4664	1029 B6	35062 RICE CANYON RD.	WILLOW	P714024 P714025	8'	S	P	L	1	TREE 8' TO SIDE OF PRIMARY LIMBS GROWING TOWARDS LINE. LC SHOULD BE LT.
PI Compliance		PI Quality								
1) Missed Tree; Non Inventory 2) Missed Tree; LC Should be LT 3) Missed Tree; Memo		1) Incorrect Species; 2) Incorrect Height; 3) Incorrect DBH; 4) Incorrect Growth Rate; 5) Incorrect Number of Units; 6) Incorrect Status of LT;			7) Incorrect Clearance; 8) Incorrect Months Next Trim; 9) Incorrect Access; 10) Incorrect Voltage; 11) Incorrect Tree-pole Notes; 12) Incorrect Address; Street;			13) Incorrect City-Zip; 14) Incorrect Property Ownership; 15) Incorrect Pole Numbers; 16) Incorrect Location Notes; 17) Incorrect Customer Information; 18) Missed Tree; Non Inv; LC		
Audit Tree		Inspection Tree								
QS1596	1029 A1	890 RICE CANYON	MULL	P213084 P213085	8'	C	P	L	1	INCORRECT DBH. TREE LISTED AS BRUSH FAST. MULTIPLE TRUNKS - 2 DBH RANGE 3.0 TO 7.9 IN.
PI Compliance		PI Quality								
1) Missed Tree; Non Inventory 2) Missed Tree; LC Should be LT 3) Missed Tree; Memo		1) Incorrect Species; 2) Incorrect Height; 3) Incorrect DBH; 4) Incorrect Growth Rate; 5) Incorrect Number of Units; 6) Incorrect Status of LT;			7) Incorrect Clearance; 8) Incorrect Months Next Trim; 9) Incorrect Access; 10) Incorrect Voltage; 11) Incorrect Tree-pole Notes; 12) Incorrect Address; Street;			13) Incorrect City-Zip; 14) Incorrect Property Ownership; 15) Incorrect Pole Numbers; 16) Incorrect Location Notes; 17) Incorrect Customer Information; 18) Missed Tree; Non Inv; LC		
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PI Compliance		PI Quality								
1) Missed Tree; Non Inventory 2) Missed Tree; LC Should be LT 3) Missed Tree; Memo		1) Incorrect Species; 2) Incorrect Height; 3) Incorrect DBH; 4) Incorrect Growth Rate; 5) Incorrect Number of Units; 6) Incorrect Status of LT;			7) Incorrect Clearance; 8) Incorrect Months Next Trim; 9) Incorrect Access; 10) Incorrect Voltage; 11) Incorrect Tree-pole Notes; 12) Incorrect Address; Street;			13) Incorrect City-Zip; 14) Incorrect Property Ownership; 15) Incorrect Pole Numbers; 16) Incorrect Location Notes; 17) Incorrect Customer Information; 18) Missed Tree; Non Inv; LC		
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Audit Tree		Inspection Tree								

Attachment: Audit Work Release Tree IDs (VMA 379)

FACILITYID

DT371  
DT322  
DT325  
DT171  
DT253  
DT312  
CV120  
DS2716  
DT235  
DS2726  
DS2728  
DT68  
DT100  
DT122  
DT367  
DT190  
DT188  
DT225  
DT259  
DT297  
DT300  
DT380  
DS2722  
DT50  
DT79  
DT111  
DT77  
DT80  
DT106  
DT127  
DT146  
DT156  
DT193  
DS2712  
DS2725  
DT59  
DT133  
DT134  
DT150  
DT480  
DT481  
DY535  
DY525  
DY590  
DY616  
DY583  
DT472  
DY486  
DY631  
DY708  
DY685

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DY702  
DY674  
DY667  
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DY690  
DY691  
DT404  
DT394  
DT393  
DY675  
DT443  
DT444  
DT446  
DT447  
DT396  
DT405  
DT451  
DT459  
DT461  
DT401  
DT402  
EK2899  
EK2877  
ED3539  
EK2833  
EK2852  
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EK2892  
EK2830  
EK2824  
EK2811  
EK2826  
EK2847  
EK2862  
EK2893  
EK2916  
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EP2198  
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EK2871  
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FF520  
FF522  
EK2927  
EP2138  
EP2136  
EP2132

EP2191  
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EP2170  
EP2171  
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FD823  
FB394  
FB369  
FB370  
FB385  
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FP5279  
GX1346  
GX1363

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ON4779  
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PB781  
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PB867  
PB854  
PB883  
PB885

PB910  
PB1019  
PB1020  
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PB1026  
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PB937  
PB959  
PB1011  
PB912  
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QJ1590  
QJ1594  
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QJ3543  
QJ3569  
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RW867  
RW870  
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