



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

September 14, 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 14 – Wildfire Expense Memorandum Account**

Dear Mr. Stannik,

Attached please find SDG&E's response to ORA Data Request 14 (ORA-SDG&E-A.15-09-010-14), dated September 6, 2016. SDG&E's response includes general objections, narrative responses and (1) attachment. Due to size, the excel file referenced is being submitted via electronic data transfer.

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-14, Q1-2  
SDG&E WEMA PROCEEDING - A.15-09-010  
SDG&E RESPONSE  
DATE RECEIVED: September 6, 2016  
DATE RESPONDED: September 14, 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.
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.

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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:**

Please provide, in Microsoft Excel spreadsheet format, recorded adjusted O&M expenses and capital expenditures for:

- a. Vegetation Management;
- b. Tree Trimming; and
- c. Pole Brushing;

for the period of January 2003 to August 2016. In the response, identify the specific accounts where the O&M expenses and capital expenditures are recorded.

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

**Response:**

“Vegetation Management” expenditures are comprised of two categories, Tree Trimming and Pole Brushing. SDG&E has previously provided the tree trimming information in response to ORA-SDG&E DR-09. As reflected in those responses, tree trimming expenses are recorded to SDG&E’s Tree Trimming Balancing Account. Pole brushing expenses are not recorded to a balancing account. SDG&E is transmitting a spreadsheet via Sempra EDT showing responsive pole brushing expenses, all of which are O&M; there are no capital expenditures.

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**Request 2:**

Please provide dollar amount requested, dollar amount authorized by the Commission, and recorded adjusted expenses for the last five GRC cycles for Vegetation Management, Tree Trimming, and Pole Brushing. Please see requested response format below:

<b>GRC Year</b>	<b>Program Expense</b>	<b>Requested Amt</b>	<b>CPUC Approved Amt</b>	<b>Recorded Amt</b>	<b>Application Decision#</b>
2002	Veg. Mgmt				
	Tree Trimming				
	Pole Brushing				
2004	Veg. Mgmt				
	Tree Trimming				
	Pole Brushing				
2008	Veg. Mgmt				
	Tree Trimming				
	Pole Brushing				
2012	Veg. Mgmt				
	Tree Trimming				
	Pole Brushing				
2016	Veg. Mgmt				
	Tree Trimming				
	Pole Brushing				

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

**Response:**

See Table below. SDG&E does not have the requested information for 2002 because there was no GRC at that time, and the 2003 GRC was deferred at the request of the Commission due to the California energy crisis.

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**(\$ in Thousands)**

<b>GRC Year</b>	<b>Program Expense</b>	<b>Requested Amt<sup>(2)</sup></b>	<b>CPUC Approved Amt<sup>(2)</sup></b>	<b>Recorded Amt<sup>(4)</sup></b>	<b>Application Decision#</b>
2002	Veg. Mgmt				
	Tree Trimming				
	Pole Brushing				
2004	Veg. Mgmt <sup>(1)</sup>	23.715	23.215	21.32	A.02-12-028 D.04-12-015
	Tree Trimming	20.146	20.146	18.280 <sup>(3)</sup>	
	Pole Brushing	3.069	3.069	3.040	
2008	Veg. Mgmt <sup>(1)</sup>	22.843	22.756	21.239	A.06-12-009 D.08-07-046
	Tree Trimming	19.652	19.652	18.127 <sup>(3)</sup>	
	Pole Brushing	3.191	3.104	3.112	
2012	Veg. Mgmt <sup>(1)</sup>	32.773	29.500	27.66	A.10-12-005 D.13-05-010
	Tree Trimming	27.419	25.500	22.914 <sup>(3)</sup>	
	Pole Brushing	5.354	4.000	4.746	
2016	Veg. Mgmt <sup>(1)</sup>	28.852	28.852	13.248(July YTD)	A.14-11-003 D.16-06-064
	Tree Trimming	24.559	24.559	11.305(July YTD) <sup>(3)</sup>	
	Pole Brushing	4.293	4.293	1.943(July YTD)	

- 1) The SDG&E vegetation management program consists of tree trimming (balanced) and pole brushing (non-balanced) costs. The vegetation management line in the the table above reflects the combined total of these two programs.
- 2) These costs are in base years dollars (2004 GRC=2001\$, 2008 GRC=2005\$, 2012 GRC=2009\$, 2016 GRC=2013\$)
- 3) Data from the tree trimming balancing account (TTBA)
- 4) Recorded data is in nominal \$