



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

September 29, 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 15 – Wildfire Expense Memorandum Account

Dear Mr. Stannik,

Attached please find SDG&E's supplemental response to ORA Data Request 15 (ORA-SDG&E-A.15-09-010-15), dated September 13, 2016. SDG&E's response includes an update to Request 1 accompanied by confidential document, TMC1010. CPUC Decision (D.) 16-08-024 requires an officer confidentiality declaration which is provided herewith.

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-15, Q1-3
SDG&E WEMA PROCEEDING - A.15-09-010
SDG&E SUPPLEMENTAL RESPONSE
DATE RECEIVED: September 13, 2016
DATE RESPONDED: September 29, 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:

Please provide SDG&E's policy and guidelines for the use of automatic reclosers as of the time of the 2007 wildfires (October 2007).

Response:

See the version of TMC1320 that was in effect in October 2007, which SDG&E previously produced to ORA.

In addition, please see attached TMC1010 which is confidential. Per CPUC Decision (D.) 16-08-024 an officer declaration of confidentiality is provided herewith signed by David Geier, Vice President of Electric Transmission and System Engineering.

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Request 2:

At the time of the 2007 wildfires (October 2007):

- a. Did SDG&E's policy require or recommend the disabling of automatic reclosing of lines based on the number of phase-to-phase trips within a certain time period? If so, please provide the number of trips and time period.
- b. Did SDG&E's policy require or recommend the disabling of automatic reclosing of lines based on any other factors? If so, please list and describe all potential factors.
- c. Please describe any limitations (technical or otherwise), policies, requirements, or CPUC rules or regulations that precluded SDG&E from disabling automatic reclosing of lines at its discretion.
- d. Please describe any limitations (technical or otherwise), policies, requirements, or CPUC rules or regulations that precluded SDG&E from disabling automatic reclosing of lines given the circumstances and conditions that occurred on October 21, 2007 on Tie Line 637.

Response:

- a. There was no formal policy requiring the disabling of automatic reclosing, but in certain instances, reclosers would be turned off. See also response to subparts (c) and (d) below.
- b. There were no specific factors.
- c./d. In the event of a transmission line fault, the protective relays open the circuit breakers, de-energizing the line, and the circuit breakers remain open for ten seconds before the reclosers attempt to reclose them. Automatic reclosers are important from a safety and reliability perspective because they allow a line to be automatically re-energized following a fault, thereby meeting the need for continuous electric service, which is critical for water pumping services, special needs customers, emergency services, traffic and street lights, communication networks, and many other societal needs. In some areas of SDG&E's service territory, particularly rural areas, there may not be other means for routing power to customers if a line is de-energized.

It is also important to recognize that there were limitations on automatic reclosing in October 2007. As explained in the "Direct Testimony of David L. Geier, San Diego Gas & Electric Company (Witch and Rice Fires)" in I.08-11-006:

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If the circuit breakers do not reclose successfully, which would indicate that the fault has not cleared after 10 seconds, the recloser “locks out” and prevents further automatic reclose attempts. If the circuit breakers reclose successfully, the circuit is restored. As an additional protection, even if the circuit breakers reclose successfully after 10 seconds, the recloser will lockout if the line faults again within 120 seconds of the initial fault. If no additional faults occur in that 120-second period, the recloser resets.

Mr. Geier further explained that “when a line tripped and reclosed successfully and the cause for the trip was unknown, the lines would be patrolled at the discretion of the field supervisor.” Mr. Geier noted that troubleshooters were dispatched to examine the faults on TL 637 on October 21, 2007. SDG&E has the discretion to disable automatic reclosers and did so on TL 637 on October 21, 2007 due to the fire.

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Request 3:

Please describe the technical process required to disable automatic reclosing of lines (for example, button or script in control software, manual switch at a substation, etc.)

Response:

A recloser cutout switch is always provided at the substation protection panel to provide local control; in some stations, SCADA control is also provided. Disabling automatic reclosing of TL637 would have required the device to be locally turned off at the Creelman substation. If SCADA were available at the Santa Ysabel substation, the SCADA system could be used; if not, SDG&E would dispatch a troubleshooter to locally turn off at the Santa Ysabel substation.

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF DAVID L. GEIER
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, David L. Geier, do declare as follows:

1. I am Vice President of Electric Transmission and System Engineering in the Energy Supply division for San Diego Gas & Electric Company (“SDG&E”). I have reviewed Transmission System Fault Testing TMC1010 submitted concurrently herewith (the “TMC1010”). I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) 16-08-024 to demonstrate that the confidential information (“Protected Information”) provided in the TMC1010 submitted concurrently herewith and as described in specificity in Attachment A, within the scope of data protected as confidential under applicable statutory provisions including, but not limited to, Public Utilities Code § 583, Govt. Code § 6254(k), General Order 66-C, and various federal regulations related to critical infrastructure

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 29th day of September, 2016, at San Diego.



Dave Geier

Vice President of Electric Transmission and System Engineering

ATTACHMENT A

SDG&E Request for Confidentiality On the following information in TMC1010

TMC1010 is an SDG&E Electric Grid Operations Standard Operating Procedure that is controlled by the Electric Grid Operations department. Its distribution and use is limited to (North American Electric Reliability Corporation) NERC certified System Operators charged with the responsibility of the safe and reliable operation of the SDG&E Bulk Electric System.

The document contains specific information that provides Transmission Substation and Transmission Line connectivity, construction details, and operating limitations that are considered by SDG&E and NERC to be sensitive information and requires protection from disclosure to non-operations personnel and the public. The document has been assigned and published by SDG&E at a security level of INTERNAL and treated as CONFIDENTIAL under NERC's Rules of Procedure, Section 1500 *et seq.*

There are several laws, regulations, and guides, that seek to protect critical infrastructure information and sensitive security information from public disclosure, for national security reasons. These include, but are not limited to: (i) Homeland Security's regulations related to Protected Critical Infrastructure Information (PCII) Program (6 C.F.R. Part 29) and Sensitive Security Information (49 C.F.R. Part 1520) and (ii) FERC Order No. 630 - Critical Energy Infrastructure Information (CEII) regulations.

