



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

January 9, 2017

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 21 – Wildfire Expense Memorandum Account

Dear Mr. Stannik,

Attached please find SDG&E's response to ORA Data Request 21 (ORA-SDG&E-A.15-09-010-21), dated December 22, 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.

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-21, Q1-4
SDG&E WEMA PROCEEDING - A.15-09-010
SDG&E RESPONSE
DATE RECEIVED: December 22, 2016
DATE RESPONDED: January 9, 2017**

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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Request 1:

In response to ORA data request 05, question 07, SDG&E provided attachment “WEMA_WSYcalcs,” which shows r-squared values of 0.7197 (SULC1 vs SIL) and 0.7288 (WSY vs SIL).

- a. Please provide the adjusted r-squared value for each of the two datasets shown in attachment “WEMA_WSYcalcs.”
- b. Please provide the standard error value for each of the two datasets shown in attachment “WEMA_WSYcalcs.”

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

Response:

Mr. Vanderburg did not calculate adjusted r-squared values or standard error values for the two datasets shown in the attachment.

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Request 2:

On lines 22 and 1-2 on pages 2-3 (respectively) of Mr. Vanderburg's rebuttal testimony, SDG&E states:

“The SAWTI’s assessment is verified by the actual events – over a dozen wildfires broke out in October 2007, from a variety of ignition sources, at multiple locations across Southern California and were driven by the intense winds.”

Did the Santa Ana Wildfire Threat Index predict the October 2007 wildfires before they occurred? Please explain.

Response:

The SAWTI does not predict wildfires, but instead rates the Santa Ana Wind event based on the potential that an ignition will become a large wildfire. That being said, the historical SAWTI timeseries constructed from reputable reanalysis data dynamically downscaled using WRF across the period 1981-present indicates that the October 2007 event was the most extreme in the period for San Diego County.

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Request 3:

Please provide all Google Earth files, layers, and other data related to the creation of Figure 1 in Mr. Vanderburg's rebuttal testimony and all of the images in Appendix 2 of Mr. Yari's rebuttal testimony.

The file(s) should be in native KML or KMZ format and contain all overlays, placemarks, paths, labels, references, markings, and other objects shown in and used to create Figure 1 in Mr. Vanderburg's rebuttal testimony and all images in Appendix 2 of Mr. Yari's rebuttal testimony.

Response:

Attached please find associated KMZ files titled 20130627_WS_149.kmz and Tieline.kmz. Mr. Vanderburg did not create a KMZ file for the two transmission poles, but manually plotted them in Google Earth using the known latitude and longitude of the poles.

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Request 4:

Please provide all underlying data, the adjusted r-squared value, and the standard error for the equation listed on lines 3-4 on page 11 of Mr. Vanderburg's rebuttal testimony.

Response:

The underlying data for the calculations on page 11, lines 3-4 are a large set of records. Those records were utilized by a process that aggregated certain data to daily values, scrubbed a number of anomalous data points, then performed statistical analysis with software called R. Attached are two files. The file named rawData.csv are all records from the two weather stations in question. The file named maxData.csv is the scrubbed data representing the maximum wind gust on each day that met the criteria of having a relative humidity of 30% or lower, and the direction of the wind between a 0 and 90 degree compass heading. The data in maxData.csv is what was used for statistical computations.

SDG&E has not calculated the adjusted r-squared value because the function is non-linear. Academic research typically suggests to not use adjusted r-squared values for non-linear regressions due to the underlying assumptions in how adjusted r-squared values are calculated. The data contained in the file maxData.csv should be satisfactory to understand the relationships between the two weather stations.

Because there are two terms in the non-linear regression, there are two standard errors available. The standard error for the linear component is 0.045637, and the standard error for the exponential component is 0.001747.