



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

August 9, 2016

**Sent Via Electronic Mail and FedEx**

A.15-09-010  
Wildfire Expense Memorandum Account

Mr. Don Kelly  
Utility Consumers' Action Network  
3405 Kenyon Street Suite 401  
San Diego, CA 92110

**Re: SDG&E Response to UCAN Data Request 02 - WEMA**

Dear Mr. Kelly:

Attached please find SDG&E's response to UCAN Data Request 02 dated July 26, 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](mailto:SSidhar@semprautilities.com).

Sincerely,

**Signed**

Shivani Sidhar  
Regulatory Case Manager

Enclosures

cc: Chris Lyons – SDG&E  
Stacie Atkinson – SDG&E

**UCAN DATA REQUEST**  
**UCAN-SDG&E DR-02, Q1-6**  
**SDG&E WEMA PROCEEDING - A.15-09-010**  
**SDG&E RESPONSE**  
**DATE RECEIVED: July 26, 2016**  
**DATE RESPONDED: August 9, 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:**

In establishing the “Santa Ana Wildfire Threat Index” Mr. Vanderburg notes on page 10 of his testimony that:

*“The Large Fire Potential output is then compared to climatological and historical fire occurrence data extending back to January 1, 1984 to establish the index rating.”*

*“We looked back 31 years because in order to understand fire potential in the present you have to compare the current conditions with the conditions that existed on prior days. Past time periods in which there actually were wildfire outbreaks are particularly important in this regard; if we have a present fire potential on our index that matches the fire potential of a previous instance in which wildfires occurred, this confirms there is a strong likelihood of a wildfire outbreak.”*

1. In the 31 years of data looked at did SDG&E obtain wind speed data from the 30 weather stations owned by the federal government and other entities in SDG&E’s service territory that were in operation prior to the start of the 2007 wildfires?

a. If so, please provide that data.

**Response:** No. For further information please see *Santa Ana Wildfire Threat Index: Methodology and Operational Implementation* paper which was previously submitted by SDG&E in response to ORA-SDG&E DR-03, Request 1 on April 28, 2016.

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**Request #2:**

On Page 3 of Mr. Vanderburg's testimony he says:

*"I place the 2007 Wildfires in historical context and provide support for my conclusion that this was the most severe fire weather event on record in San Diego County. I also explain that the wind gusts at the time of the 2007 wildfires were extreme."*

2. The methodology in establishing the Santa Ana Wildfire Threat Index considers, among other data inputs, weather data and fuel moisture data (which includes examining dryness levels, live fuel moisture and annual grasses).

In Mr. Vanderburg's assessment that the 2007 wildfires were the most severe wildfire event on record, did he have access to all the weather and fuel moisture data used by the index before making this conclusion or were there some data unavailable? Please explain.

**Response:** Yes, this conclusion was based on an analysis of the weather and fuel moisture data used to create the Santa Ana Wildfire Threat Index. Note: Mr. Vanderburg's conclusion is that October 2007 was "the most severe fire weather event on record for San Diego County," not "the most severe wildfire event," as mentioned by UCAN in the question.

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**Request #3:**

In the 31 years of data looked in establishing the Large Fire Potential Output for Santa Ana Wildfire Threat Index did SDG&E obtain fuel moisture data for all 31 years? If so, please provide that data. If not, please describe what data was available and please provide that data.

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

**Response:** The fuels data was calculated through historical reanalysis using the Weather Research Forecasting (WRF) model as part of the creation of the Santa Ana Wildfire Threat Index. Much of the fuel moisture data is embedded within a much larger dataset consisting of terabytes of gridded NetCDF files.

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**Request #4:**

Mr. Vanderburg states on page 13 of his testimony:

*“Based on the known relationship between those two weather stations (Julian RAWs and the SDG&E weather station at West Santa Ysabel) collected over the past several years, I can calculate what the wind speed would have been in the area of the Witch Fire ignition on October 21, 2007”*

*“According to my calculations, the peak wind gust at West Santa Ysabel in October 2007 would have been 1.56 times stronger than what was observed at the Julian RAWs.”*

4. Is the “known relationship” of wind speeds observed between Julian RAWs and SDG&E’s West Santa Ysabel stations always 1.56 times stronger at West Santa Ysabel? If not, please explain and also describe why 1.56 times was used for the calculations in testimony.

- a. Please describe how the “known relationship” was derived.
- b. Does the “known relationship” vary in any way depending on the time of day, the time of year, or other factors or is it always constant? Please explain.
- c. How many years of historical wind speed data does SDG&E have from Julian RAWs? Please provide that data.

**Response:**

- a. See SDG&E’s response to MGRA DR-01, Request 10.
- b. There is always some variability in this relationship based on the strength of the event and the extent of the winds. Standard deviation calculations have been provided in the document attached to MGRA DR-01, Request 10.
- c. SDG&E does not archive wind speed data from the Julian RAWs. That data can be obtained online through various sources including [mesowest.utah.edu](http://mesowest.utah.edu).

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**Request #5:**

Questions related to Dr. Jon Peterka's testimony:

In reviewing the appendices served with Mr. Peterka's testimony it does not seem possible to recreate his work with the information provided. For example, Dr. Peterka indicates that he determined wind gust factors at various RAWs sites, but the appendices do not provide the raw wind speed data that he relied on for his determinations on wind speed profiles and wind direction profiles. Please confirm if all of Mr. Peterka's work papers are included with his filed testimony. If not, please provide his work papers that are not included.

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

**Response:** Per the July 29, 2016 meet and confer between counsel for SDG&E and counsel for UCAN, SDG&E will provide UCAN with a flash drive containing several GB of data generated in connection with Dr. Peterka's testimony. SDG&E expects to make that data available by August 12, 2016. As discussed during the meet and confer, SDG&E is also providing the explanation of the additional 1.5 TB of data that it believes would not be useful to UCAN:

These files are related to WRF (Weather Research and Forecasting computer program) runs grouped by fire under directory headings SUB1, SUB2, ... SUB5 containing files for Witch Creek fire, Rice Canyon fire, Guejito fire, plus a sensitivity study at Albuquerque, NM. Some files contain fluctuating wind speed data from hot-wire (which are actually 5-hole probe data) measurements of three fluctuating velocity vector components on scale models of terrain in the wind tunnel for the three fires. The sensitivity studies (SUB4 and SUB5) were used to determine the approximate time duration (averaging time) of WRF output velocities, based on program inputs, such as the grid spacing. Under the SUB directories, there are RUN directories for typically four separate runs in which the sensitivity of WRF outputs to changes in selected inputs were determined.

Many of the files are WRFOUT files containing gridded WRF data that is intended only for WRF to read and write (files are in binary). Each WRFOUT file is for a fire, a calculation domain (there were three 3 domains), and a point in time (6 hour intervals for almost a week of total run time for each run for each fire). There are input namelist files in ASCII format for each case, a listing of WRF parameters selected for each fire in DOC format, gridded WRF output files in CSV format (each is typically several GB in size and so needs software that can read large files), some GIF movie files of WRF output variables, and a number of input/output files used by WRF or written by WRF in ASCII or other formats (probably binary). Someone experienced in running the WRF program might recognize these files.



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**Request #6:**

Seeking clarification for SDG&E's answer to UCAN DR-01, question #5.

In UCAN DR-01 question #5 we asked:

**Request #5:**

Did SDG&E or its attorneys in any of the 2,500 settled lawsuits related to the Witch, Guejito or Rice 2007 wildfires obtain any report or document during the course of litigating the 2,500 claims mentioned above that contains an evaluation on whether SDG&E was negligent, failed to perform a duty, or deviated from the minimum standard of care necessary for the safe and prudent operation of its utility such that it led to the ignition and/or contributed to the severity of the 2007 Witch, Guejito and/or Rice wildfires?

- a. If so, please explain.
- b. If SDG&E obtained any report or documents (including interrogatories and/or deposition transcripts) from Plaintiff experts, please provide those as well.

**SDG&E answered:**

**Objection:** SDG&E objects to this request on the grounds set forth in General Objections 1, 2, 3, 4 and 8. Subject to the foregoing objections, SDG&E will respond to this request by July 13, 2016 or will indicate on that date when it expects to be able to provide a response.

**Response:** Subject to the foregoing objections, SDG&E responds as follows. The only non-privileged reports or documents of which SDG&E is aware are the California Department of Forestry and Fire Protection Investigation Reports into each of the three fires, and the materials prepared by the CPUC Consumer Protection and Safety Division materials from I.08-11-006 and I.08-11-007 previously made available by SDG&E to all parties in this proceeding.

6. Does SDG&E have any reports or documents for which a claim of privilege is being made that contains any evaluation (either positive or negative) on whether SDG&E was negligent, failed to perform a duty, or deviated from the minimum standard of care necessary for the safe and prudent operation of its utility whether from its own experts or others? If so, please identify the privilege and facts supporting the assertion of the privilege.

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**Objection:** SDG&E incorporates by reference herein its objection to UCAN DR-01, Request 5 (as reproduced above). Subject to the foregoing objection, SDG&E responds as follows.

**Response:** In connection with the 2007 Wildfire Litigation, SDG&E's lawyers undertook various analyses to assess issues of liability, and SDG&E may have reviewed or received reports from wildfire plaintiffs in connection with mediations. All such analyses were undertaken under the Attorney-Client Privilege, the Attorney Work Product Privilege and/or Mediation Privilege.