

**CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE DATA REQUEST:
CEJA-SDG&E-01
2020 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

Date Received: February 28, 2020

Date Submitted: March 4, 2020

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, 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.

**CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE DATA REQUEST:
CEJA-SDG&E-01
2020 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

Date Received: February 28, 2020

Date Submitted: March 4, 2020

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.

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 and for no other purpose.

**CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE DATA REQUEST:
CEJA-SDG&E-01
2020 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

Date Received: February 28, 2020

Date Submitted: March 4, 2020

III. RESPONSES

QUESTION 1:

SDG&E states in its Feb. 7, 2020 Wildfire Mitigation Plan (hereinafter “WMP”) that it plans to increase undergrounding. See, e.g., WMP, p. 42. SDG&E also has a number of hardening projects. Does SDG&E consider the increased vulnerabilities certain populations face when making decisions about where to conduct hardening such as undergrounding? Has there been a situation where a certain measure was prioritized due to the communities’ increased social and economic vulnerabilities?

OBJECTION:

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

RESPONSE 1:

Generally, SDG&E’s undergrounding and hardening projects are focused on its overarching objective of reducing the wildfire risk and the impacts of Public Safety Power Shutoff (PSPS) to customers. While the needs of vulnerable populations are a critical part of determining which projects to implement, SDG&E considers other factors to determine where the greatest overall fire risk reductions can be achieved. Such factors include weather patterns, vegetation density, fuel moisture and other elements that can contribute to either sparking or spreading wildfires. In addition, when considering strategic undergrounding, SDG&E considers the frequency of PSPS in the area, wind speed, potential fire risks and its effect to communities, egress/ingress, and critical resource facilities. Areas identified as highest risk areas may or may not include vulnerable populations and the ultimate decision depends on where a fire could start and how it could spread and impact communities beyond the starting point of the fire.

That said, as a part of SDG&E’s work to reduce PSPS impacts, SDG&E is identifying solutions specifically targeted towards supporting vulnerable communities. Those solutions may include undergrounding and hardening but, in some cases, may include provisions of backup generation and microgrids.

**CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE DATA REQUEST:
CEJA-SDG&E-01
2020 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

Date Received: February 28, 2020

Date Submitted: March 4, 2020

QUESTION 2:

SDG&E states in its WMP that it randomly selects 1.5% of inspections to assess whether they were properly performed. WMP, p. 44. Why was 1.5% chosen? What does the assessment examine? Does this assessment measure the effectiveness of inspections? Please produce a summary of the results of this assessment that was conducted in conjunction with the 2019 work.

OBJECTION:

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

RESPONSE 2:

Given the amount of time and resources, SDG&E believes 1.5 percent captures a sufficient amount of inspections to audit to determine whether the inspections are effective. Out of the 81,997 of inspections performed per year, 1.5% or approximately 1,541 are audited by SDG&E.

As explained in SDG&E's 2020 WMP at Section 5.3.4.1 (pages 95-97), these assessments are essentially an audit of a completed inspection to ascertain the effectiveness of the inspections. Specifically, an Electric Construction Supervisor visits the previously inspected structures in the following quarter and notes any findings with their field audit with the documented results from the inspectors. If there are any findings, those are entered into an inspection and maintenance database where the additional audit finding can be resolved. Feedback is also provided to the inspector regarding those audit findings to further refine future inspections.

From January 1, 2019 through September 30, 2019, SDG&E audited 1,541 structures which resulted in 51 findings where the original inspection results did not fully match the Electric Construction Supervisor's field audit. Upon re-evaluation of the 51 findings, the Electric Construction Supervisor found that 46 inspections were valid, however, they found additional items not captured by the original inspection. For the remaining 5 findings, the Electric Construction Supervisor determined the original inspection did not match the field audit. The results for the last quarter of 2019 is not yet available.

**CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE DATA REQUEST:
CEJA-SDG&E-01
2020 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

Date Received: February 28, 2020

Date Submitted: March 4, 2020

QUESTION 3:

As related to the infrared inspection program, SDG&E states that: “Given that this is currently a pilot program, repairs resulting from these inspections are not estimated herein.” WMP, p. 99. Has SDG&E examined the effectiveness of this program? If so, how has it been measured, and what are the results?

OBJECTION:

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

RESPONSE 3:

The creation of a routine infrared inspection program for distribution is a new program, however, SDG&E currently has routine transmission and substation infrared inspection programs and has in the past performed infrared inspections on distribution circuits on an ad hoc basis. The effectiveness of this program is determined from the finding of conditions that could lead to a potential equipment failure. SDG&E evaluates and documents not only the number of conditions, but the severity of the conditions as well to ensure the appropriate corrections are implemented. SDG&E reviews the results at the end of each year. In 2017, 2018, and 2019, the current infrared inspection programs, including transmission, substation, and ad hoc distribution, resulted in 38, 56, and 49 findings respectively.

**CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE DATA REQUEST:
CEJA-SDG&E-01
2020 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

Date Received: February 28, 2020

Date Submitted: March 4, 2020

QUESTION 4:

SDG&E's WMP has a focus on increasing situational awareness. How does SDG&E measure the effectiveness of situational awareness measures? Does SDG&E track its response time to ignitions? If so, can you provide a summary of the response times for the 2019 and 2018 season, and your assessment of whether the situational awareness impacted these times.

OBJECTION:

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

RESPONSE 4:

While quantifying awareness is challenging, SDG&E endeavors to maintain a high level of situational awareness year-round. SDG&E has developed relationships with the fire agencies within its service territory, which has enabled SDG&E to receive dispatches for vegetation fires directly from emergency dispatch. SDG&E's Fire Science and Coordination Team (discussed in SDG&E's 2020 WMP at Section 5.3.9.2) staffs a 24/7 On-Duty position that monitors these dispatches, fire radio traffic, public information platforms, and internal tools to determine the need for and appropriate level of initial response.

While all vegetation fire dispatches in the SDG&E service territory are monitored, not all ignitions require SDG&E response (all orders by the fire departments are filled immediately). Additionally, in many cases the high level of situation awareness and experience with fire response enables SDG&E to anticipate a request and respond before a formal request has been made by the Incident Commander. Maintaining the relationships with the first responder agencies through regular training and exercise ensures safe and effective response. SDG&E also provides the 24/7 On Duty number to first responder agencies and requests feedback to ensure the effectiveness of the measures the company has in place.

SDG&E does not track the response time to ignitions, but the situational awareness tools enable a more coordinated and efficient emergency response.

**CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE DATA REQUEST:
CEJA-SDG&E-01
2020 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

Date Received: February 28, 2020

Date Submitted: March 4, 2020

QUESTION 5:

SDG&E details its plans for microgrids in its WMP. See, e.g, WMP, pp. 76-79. How did SDG&E prioritize potential locations for microgrids? Were the communities involved in the microgrid solutions?

OBJECTION:

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

RESPONSE 5:

SDG&E's microgrid projects, Cameron Corners, the Ramona Air Attack Base, and Desert Circuit 221 (discussed in its 2020 WMP at 76-79), are prioritized in accordance with SDG&E's wildfire mitigation program prioritization and resource allocation process outlined in WMP Section 5.3.8. Site identification prioritizes communities most impacted by PSPS events and facilities which provide essential services during PSPS events in the traditional backcountry. The criteria that drove these locations to be addressed first in priority is operational history, the low to no undergrounding required to meet project goals, the availability of land, and feasibility from a cost perspective.

- Cameron Corners was selected as a microgrid site due to the de-energization of essential community infrastructure during October 2019 PSPS events. The surrounding community is remote, low income, and heavily impacted by PSPS outages. This crossroads location, including a convenience store, gas station, telecom central office, medical facility, school, library and a CAL FIRE station, was first highlighted during patrols of lines following the 2019 event. Local generation and energy storage are required for Cameron Corners to remain energized in extreme weather conditions because these facilities are beyond the reach of undergrounding projects near the substation.
- The Ramona Air Attack Base (RAAB) is a customer-driven project, prioritized due to the critical infrastructure for wildfire response and safety of San Diego County and surrounding communities. This site is directly adjacent to a low-income community. An on-site fire-retardant mixing station, CAL FIRE Air Support, and United States Forest Service will remain energized, and prevent the need for SDG&E to assume additional risk to keep these resources energized under extreme weather conditions.
- The Desert Circuit 221 (C221) desert community is a low-income community outside the HFTD, however, due to the C221 distribution line crossing through the HFTD, this desert community frequently experiences PSPS during extreme weather events. This dense load

**CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE DATA REQUEST:
CEJA-SDG&E-01
2020 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

Date Received: February 28, 2020

Date Submitted: March 4, 2020

pocket at the end of the circuit does not require undergrounding, allowing the project to deploy more quickly than one requiring underground conversion.

Section 5.3.10. in the WMP describes in detail the stakeholder cooperation and community engagement for projects. For these microgrids, the critical facilities' management, impacted customers, and surrounding community are engaged in the solution. Upon selecting a site, the first step in the WMP microgrid process is to conduct a site visit where initial conversations begin and contacts are established. This allows for engagement on solution location, discussion on what facilities are considered essential to the community, and general opinions on the solution leading to iterative project review. As with existing sites, such as SDG&E's Borrego Springs Microgrid, customer and county engagement continue throughout the development and operation of the project.

**CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE DATA REQUEST:
CEJA-SDG&E-01
2020 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

Date Received: February 28, 2020

Date Submitted: March 4, 2020

QUESTION 6:

SDG&E's WMP states that it is looking at renewable portable generator options. See WMP, p. 81. What type of options is SDG&E examining?

OBJECTION:

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

RESPONSE 6:

SDG&E is exploring different portable battery solutions that leverage portable solar panels, often referred to as "brief case" solar panels. SDG&E is also evaluating battery technologies such as Lead-Acid, however, the vast majority of its focus is on Lithium-Ion, high density battery technologies.

**CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE DATA REQUEST:
CEJA-SDG&E-01
2020 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

Date Received: February 28, 2020

Date Submitted: March 4, 2020

QUESTION 7:

SDG&E states that it is “developing its customer engagement activities via a centralized team of associated departments...” WMP, p. 115. It further states that feedback helped SDG&E establish its Community Resource Centers. WMP, p. 115. Has SDG&E taken into account whether its CRCs are accessible by public transportation? Does SDG&E offer filtered air at its resource centers? Can you give examples of how the feedback received has changed the design of the CRCs?

OBJECTION:

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

RESPONSE 7:

In determining where to site its Community Resource Centers (CRCs), SDG&E considered various locations. While SDG&E did take into account these locations’ proximity to available modes of public transportation, the challenge is that many modes of public transportation simply do not exist in these areas as they are far removed from metropolitan areas. CRCs provide resources to those near or around the impacted area and if customers live in remote areas without access to public transportation, SDG&E believes that customers should already have incorporated transportation arrangements into their individual emergency preparedness plans. SDG&E continues to explore enhancements to program offerings where cost effective.

SDG&E does not own the physical locations of where the CRCs are located. The air is provided by the facility owner. Since establishing its CRC program, SDG&E has continued to incorporate customer and community feedback in the overall program design. SDG&E’s initial CRC program did not offer ice or water trucks as a standard service but through direct customer feedback, SDG&E incorporated both ice and water trucks as standard offerings for the program. Additional customer feedback was received, which resulted in SDG&E relocating CRC locations in the community of Descanso to a more accessible location.

**CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE DATA REQUEST:
CEJA-SDG&E-01
2020 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

Date Received: February 28, 2020

Date Submitted: March 4, 2020

QUESTION 8:

Has SDG&E determined what percentage of total customers in areas impacted by PSPS events are reached by and understand their outreach? How is understanding of outreach communications measured?

OBJECTION:

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

RESPONSE 8:

SDG&E conducts customer education and outreach through a variety of methods. Though PSPS messaging and materials are distributed throughout the region, special emphasis is placed on communications to the most at-risk customers in the High Fire Threat District (about 182,000 customers). SDG&E's public education campaign employs a multi-pronged approach that targets communities most likely to be impacted by PSPS events, such as community open houses and wildfire safety fairs, customer bill inserts and community newspaper advertising. SDG&E conducts annual customer research to measure recall and understanding of educational materials and messaging before and after the campaign is in market. Research results are then used to refine and improve customer communications.

PSPS notifications also go out to customers and other stakeholders impacted by adverse-weather events using SDG&E's Enterprise Notification System (ENS) via email, text and/or voice messaging. Last year SDG&E sent 51,046 PPS notifications to 48,741 impacted customers in the company's service territory. The ENS system can track these communications and verify delivery of messaging (88% of customer notifications were delivered in 2019). More than 400,000 visits were also recorded for the dedicated PPS page on sdge.com during adverse-weather events that resulted in PPS activations last year. Customer research is also conducted annually with customers impacted by PPS events. Research results provide insight into customer recall, sentiment and understanding about the PPS notifications that were delivered.