PUBLIC ADVOCATES OFFICE DATA REQUEST: CALPA-SDG&E-02
2020 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE

Date Received: March 4, 2020
Date Submitted: March 9, 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.

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.

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III. RESPONSES

QUESTION 1:

On p. 83 of SDG&E's 2020 WMP, SDG&E states that it "anticipates installing approximately 300 whole home [generator] units in 2020 and expects that to continue in future years of the plan."

a) What type of generators does SDG&E propose to install?
b) Does SDG&E intend to maintain ownership of the generators? Does SDG&E intend to service and maintain them?
c) Where does SDG&E propose to install whole home generator units? Has SDG&E identified specific circuits where it intends to install the units?
d) Will each generator unit serve a single home?
e) Will SDG&E provide the generator equipment and installation at no cost to the customers, or will customer contribute a portion of the costs?

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:

As discussed in its 2020 WMP, Section 5.3.311.3, the Whole House Generator program is amongst the numerous Public Safety Power Shutoff (PSPS) mitigation options SDG&E's PSPS Mitigation Engineering team is currently evaluating. As such, there is still a lot of detail that remains to be developed regarding the mitigation options. Until the PSPS Mitigation Engineering team completes its analysis, the following responses are preliminary and subject to change.

a) SDG&E is currently evaluating a broad range of generators from fossil fuel generators to renewable resources.

b) Currently, SDG&E intends to provide the funds for the whole home generators and customers would own and maintain the generators.

c) At this time, SDG&E has not identified specific circuits yet but is targeting customers who have been de-energized for safety at least one time in 2019.

d) At this time, SDG&E has not yet determined whether a generator will only serve a single home.

e) Currently, SDG&E plans to provide the generator and installation at no cost to the customers.

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QUESTION 2:

On p. 103 of SDG&E's 2020 WMP, SDG&E states that when inspections locate issues related to third party communication equipment, "SDG&E has provided notification to those companies." SDG&E states that 36 such issues were found in 2019.

a) Has SDG&E confirmed with the third party communications providers that these issues have been resolved?
b) Does SDG&E perform follow-up inspections to ensure that adequate mitigation of the issue has been performed?
c) If so, after what period of time does SDG&E perform follow-up inspections?

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:

a) SDG&E reviews all known fire-related communication infrastructure provider (CIP) infractions in preparation for each fire season and communicates updates on their status to the CIPs several times prior to fire season. In 2019, SDG&E implemented a program to field verify whether the CIPs resolved the issues SDG&E identified. SDG&E does not have authority to require the CIPs to resolve issues. SDG&E follows up with the CIPs and if safety issues are not resolved by the CIP, SDG&E, to the extent it can depending on what the issue is, will perform work to make it safe and/or take the condition into consideration when faced with extreme operating conditions.
b) See response to Question 2(a) above.
c) In addition to a seasonal field verification, SDG&E performs ad hoc inspections as required depending on CIP responsiveness.

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QUESTION 3:

On p. 120 of SDG&E's 2020 WMP, SDG&E states: In 2019 SDG&E entered into contract with a vendor that developed a mobile phone app which utilizes LiDAR data and PLS-CADD modeling for field verification of tree clearances, line movement, and position relative to electric infrastructure. Thus far, data modeling and acquisition has been somewhat inconsistent, but SDG&E continues to pilot the use of the app within its routine tree inspection activity.

a) What does SDG&E mean what it states that data modeling and acquisition has been "somewhat inconsistent?"
b) For how long does SDG&E intend to pilot this app?
c) Has SDG&E defined a timeline and criteria for determining whether this pilot is successful and should be adopted more broadly or permanently?

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:

a) SDG&E implemented a pilot for the mobile app specifically for inspections of its transmission voltage lines. The inconsistencies in data modeling and acquisition refer to the lengthy conversion process of the PLS-CADD data into the proper format for integration with the mobile app. The processing time can take several weeks to months, which does not allow for timely use of the app within our routine inspection schedule.
b) At this time, SDG&E is still considering the value and feasibility of this app and has not determined the duration of scope.
c) For the reasons explained in response to Question 3(a) above, SDG&E will determine toward the end of 2020 whether the use of this app can be efficiently integrated into its routine transmission inspections and whether it can be expanded into its distribution inspections.

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QUESTION 4:

On p. 121 of SDG&E's 2020 WMP, SDG&E states that "SDG&E's tree-trim scope will be increased to achieve a 25-foot clearance post-prune, where feasible, between trees and electric facilities within the HFTD." In D. 19-05-039, the Commission states that "In SDG&E's next WMP, it shall propose, in detail, guidelines for where a 25-footpost-trim clearance for vegetation management is both feasible and necessary."

a) How did SDG&E determine that a 25 ft. post trim clearance is necessary for the HTFD? Did SDG&E consider other clearance distances?
b) What evidence does SDG&E have available that supports a 25 ft. clearance over the 12 ft. minimum clearance recommended in General Order 95?
c) SDG&E proposes to achieve a 25 ft. clearance "where feasible." How does SDG&E determine where a 25 ft. clearance is feasible?
d) In what fraction of the right-of-way miles in SDG&E's HTFD does SDG&E believe it will be "feasible" to increase post-trim clearances to 25 ft. in the 2020-2022 period?
e) What is the incremental cost of trimming to a 25 ft. clearance over a 12 ft. clearance?
f) Does trimming to a 25 ft. clearance provide additional risk reduction over a 12 ft. clearance? Please quantify the risk reduction of trimming to a 12 ft. vs. a 25 ft. clearance.
g) Why does SDG&E propose to trim *all* trees in the HTFD to achieve a 25 ft. clearance rather than trimming identified hazard trees and hazardous tree species[1] to achieve a 25 ft. clearance?

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:

a) SDG&E's historic data shows that a majority of tree-related outages on distribution voltages are caused by branch failure or trunk failure. These outages typically occur where the pre-outage clearances were well outside the minimum clearance requirement. SDG&E traditionally obtains a 20-35 feet clearance or greater on transmission voltages. Statistically, SDG&E experiences very few tree-related transmission outages -- less than a contact a year over the last five years, compared to an average of 40 vegetation contacts a year on the distribution system where the clearance requirements are reduced. To reduce the risk of vegetation line strike, SDG&E has established greater time-of-trim clearances to prevent instances where long branches adjacent to and above the line could detach and fall into the lines. This clearance will be performed on targeted species within the HFTD, which comprise roughly 80,000 of over 400,000 trees in SDG&E's inventory.

The clearances will not be applied arbitrarily, but will factor site-specific clearances, industry directional pruning standards (e.g., ANSI A-300), and proper techniques.

b) Please see the response to Question 4(a) above.

c) Please see the response to Question 4(a) above.

d) SDG&E does not intend to achieve a 25 feet clearance in a consistent, linear fashion. The clearance will be applied where applicable, primarily on targeted species and where site-specific conditions warrant.

e) SDG&E tree work is performed on a unit cost basis. Whether there are additional costs to achieve greater clearances will depend on factors including scope of work, equipment, crew makeup, time, etc. Additional cost may be incurred if unit work is converted to hourly-cost work.

f) As described in its response to Question 4(a) above, SDG&E believes that by achieving post-trim clearances on the distribution system that are in alignment with the transmission system clearances, vegetation contact performance on the distribution system will begin to improve from approximately 40 contacts per year (current distribution average) to a number closer to the transmission average of less than one contact per year. SDG&E recognizes there are many more miles of exposure on the distribution system and matching the transmission performance would be a difficult task, however, SDG&E expects vegetation contacts in the HFTD to drop significantly due to this program.

g) Please see the response to Question 4(a) above.

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QUESTION 5:

On p. 85 of SDG&E's 2020 WMP, SDG&E states that in 2020, SDG&E plans to install a total of 25 miles of underground distribution lines. Table 23 on p. 40 of Appendix A forecasts a low scenario with 8 miles of electric lines undergrounded, and a high scenario with 12 miles of electric lines undergrounded.

a) Please explain the discrepancy. How many line miles is SDG&E proposing to underground in 2020?
b) Where is SDG&E planning to underground electric lines in 2020?

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:

a) As outlined in SDG&E's 2020 WMP at page 85, SDG&E plans to install a total of 25 miles of underground distribution lines in 2020, which includes a combination of Cleveland National Forest (CNF) (discussed in 2020 WMP at Section 5.3.3.17.2, page 88) and Strategic Undergrounding Programs. Through the CNF project, SDG&E plans to install 14 miles and Strategic Undergrounding will undertake the remaining 11 miles. Table 23, Row "Undergrounding of Electric Lines and/or Equipment" reflects a range of miles (8 to 12 miles) to be treated by Strategic Undergrounding. A few rows down in Table 23, Row "CNF Fire Hardening (Distribution UG)" reflects a range of miles (11.2 to 16.8 miles) to be treated by CNF.

b) The 14 miles of CNF undergrounding is located on Circuit 440 near Mount Laguna, which is located within Tier 3 of the HFTD. For its Strategic Undergrounding program, SDG&E has over 50 miles of underground distribution projects currently in the design phase. These projects are targeting critical infrastructure such as commercial centers, gas stations, fire departments, and schools all located areas within the HFTD. These include the communities of Downtown Julian, Valley Center, and Santa Ysabel. The projects with the fewest constraints will be the first miles constructed.

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QUESTION 6:

SDG&E states on p. 84 of the 2020 WMP that strategic undergrounding is taking place "on a pilot basis." How will SDG&E judge the outcome of the pilot program? What are the parameters for success or failure of the pilot program?

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 has significant experience undergrounding distribution lines in the urban areas of its service territory, however, to date SDG&E has not yet installed many of these underground projects in a rural setting. In rural areas, there are unknown terrain, environmental, and cultural considerations, which may impact the schedule and costs of these projects. Furthermore, these rural undergrounding projects would require SDG&E to utilize non-standard trench configurations and potentially non-standard cables in an attempt to reduce the cost per mile of its standard underground projects.

With this in mind, the markers of success for the first installations of these strategic undergrounding projects would include the on-schedule completion of the project (demonstrating the ability to work through the stated challenges) with a cost per mile at or below SDG&E's current average underground cost per mile. In addition, after the pilot undergrounding is complete, SDG&E will evaluate how the area that was undergrounded was impacted during the fire season. At this time, SDG&E believes that success will result in a significant reduction of PSPS after undergrounding and that the communities/customers benefited by remaining energized during extreme weather conditions. It is important to note that large-scale wind events might still result in a PSPS for an underground circuit if a location or substation upstream is de-energized.

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QUESTION 7:

SDG&E states on p. 72 of the 2020 WMP that it is "piloting the use of covered conductor." How will SDG&E judge the outcome of the pilot program? What are the parameters for success or failure of the pilot program?

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:

The focus of SDG&E's pilot covered conductor program is on work methods related to covered conductor. SDG&E plans to evaluate the outcome of this pilot based upon input from the crews constructing the job, with the goal of identifying: any equipment concerns, work methods, specific tools to assist in future jobs, required design changes and/or modifications to standards. SDG&E will also be adhering to existing processes for post-construction evaluation to align with existing construction in HFTD. In addition, success of the covered conductor pilot will consist of zero major concerns from the construction crews requiring significant changes to equipment or design, and infrared of all connection points reporting typical values.