

**PUBLIC ADVOCATES OFFICE DATA REQUEST: CALPA-SDGE-03
2021 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

**Date Received: February 18, 2021
Date Submitted: February 23, 2021**

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.

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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

The following questions relate to the cost estimates in Section 3 of SDG&E's 2021 Wildfire Mitigation Plan (WMP).

QUESTION 1:

Please provide the data requested in attachment A regarding the annual revenue requirements associated with your WMP. State revenue requirements based on the year when you expect costs to be recovered (not the year when costs are incurred).

- a) In tab 1 of attachment A ("Q1A Revenue Req 2020"), state the annual revenue requirements associated with actual WMP spending that occurred in 2020.
- b) In tab 2 of attachment A ("Q1B Revenue Req 2021"), state the annual revenue requirements associated with WMP spending that occurs in 2021.
- c) In tab 3 of attachment A ("Q1C Revenue Req 2022"), state the annual revenue requirements associated with WMP spending that occurs in 2022.

For purposes of parts (b) and (c), please assume that (1) you will spend exactly the amounts forecast in section 3 of your 2021 WMP Update and (2) you will seek cost recovery of all costs incurred pursuant to your WMP.

Note: The tables provided in attachment A are intended to provide an exhaustive summary of WMP costs. If you are unable to match any costs to the categories in the table, please contact the Public Advocates Office for clarification.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 1:

SDG&E does not currently have a revenue requirement available for its 2021 Wildfire Mitigation Plan (WMP). However, SDG&E provides the following table with an illustrative revenue requirement below, from an analysis that SDG&E conducted in 2020. This table sets forth an illustrative revenue requirement based upon: recorded costs for 2019 through third quarter 2020 (i.e., September 2020); a forecast for the last quarter of 2020; forecasted costs for 2021 and 2022 as stated in SDG&E's 2020 WMP; and a proxy for 2023 based on the 2022 forecasts. Please note that SDG&E's WMP annual revenue requirements are based on fully loaded and escalated costs, which the table below reflects. The revenue requirement is also inclusive of both capital and O&M spend. SDG&E has not calculated revenue requirement for

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years beyond 2023.

**Illustrative Incremental Forecasted Revenue Requirement Summary
(In Millions)**

	2019	2020	2021	2022¹	2023²
CPUC WMP Revenue Requirement	\$45.3	\$139.6	\$172.6	\$215.3	\$269.7
WMP GRC Revenue Requirement³	(\$23.6)	(\$68.5)	(\$73.5)	(\$79.1)	(\$84.7)
Incremental WMP Revenue Requirement	\$21.7	\$71.1	\$99.1	\$136.2	\$185.0
Regulatory Interest⁴	\$0.0	\$0.1	\$1.0	\$1.8	\$2.9
Total Incremental WMP Revenue Requirement	\$21.7	\$71.2	\$100.1	\$138.0	\$187.9

¹ Amounts shown for 2022 and 2023 are consistent with Application 17-10-007/008, SDG&E's Petition for Modification of Test Year 2019 General Rate Case Decision 19-09-051 (April 9, 2020).

² *Id.*

³ Amount shown for 2019 is the revenue requirement based upon the implementation of Wildfire Mitigation Plan Memorandum Account, which took effect on May 30, 2019. The full year WMP GRC revenue requirement is \$38.8 million.

⁴ Based on SDG&E's average regulatory interest rate of 0.70% for 2020 (Commercial Paper Rate).

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QUESTION 2:

Please provide the data requested in tab 4 of attachment A (“Q2 Spending”) by stating the costs associated with your 2020 WMP and 2021 WMP Update. For purposes of this question, please assume that (1) in 2021 and 2022 you will spend exactly the amounts forecast in section 3 of your 2021 WMP Update and (2) you will seek cost recovery of all costs incurred pursuant to your WMP. State costs based on the year when costs are incurred, not the year when they are recovered.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 2:

The requested information for 2020 will not be available until March 31, 2021, when SDG&E submits its Risk Spending Accountability Report to the CPUC. The information for 2021 and 2022 will not be available until March 31, 2022, and March 31, 2023, respectively.

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QUESTION 3:

Provide a narrative explanation of the calculation and any workpapers supporting the calculation of Table 3-3 on p. 9 of SDG&E's 2020-2022 Wildfire Mitigation Plan Update.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 3:

In order to calculate the increase in electric costs to ratepayers due to wildfire mitigation plan activity, SDG&E isolated the revenue requirements associated with those activities from the total GRC base margin and calculated the rate and bill impact for the increase. Based on the incremental residential average rate calculated for these activities, the residential average bills were forecasted assuming the monthly consumption to be 500kWh/month. Please refer to "2021 WMP CalPA-SDGE DR3 Q3.xlsx" as the workpaper supporting the calculations in Table 3-3 of SDG&E's 2021 WMP Update.