

**PUBLIC ADVOCATES OFFICE DATA REQUEST: CALPA-SDGE-07
2021 WILDFIRE MITIGATION PLAN
SDG&E RESPONSE**

**Date Received: March 9, 2021
Date Submitted: March 11, 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 SDG&E's 2021 WMP.

QUESTION 1:

Regarding table 11 of the non-spatial data submission for SDG&E's 2021 WMP filing:

- a) Row *1.b* is described as the measure of "Circuit-events, measured in number of events multiplied by number of circuits de-energized per year." Please provide an additional row of data, defined as "sum over all 2020 events of number of circuits de-energized in each event." This would result in the total instances of circuit de-energization in SDG&E's 2020 Season.
- b) Row *1.c* is described as the "Duration calculated from first device de-energized to last device restored." Please provide an additional row of data, defined as "sum over all 2020 events of (sum over all circuit-segments of [customers affected on the circuit-segment times the circuit-segment's duration from de-energization to restoration])." This would result in the total customer-hours affected in SDG&E's 2020 Season.

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:

- a) Please refer to "Attachment B – WMP Tables 1-12_Revised 03-04-2021" for revised Table 11 metrics.

The de-energized circuit counts in 2020 are as follows:

Q3 2020: 2 circuits de-energized
Q4 2020: 128 circuits de-energized

- b) Please refer to "Attachment B – WMP Tables 1-12_Revised 03-04-2021" for revised metric 1.c. (total customer hours).

QUESTION 2:

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Regarding Table 11 of the non-spatial data submission for SDG&E's 2021 WMP filing:

In 2017 and 2018, SDG&E appears to have notified more people prior the de-energization event (row 4.c) than were later de-energized (row 4.a). This fact leads to a notification percentage greater than 100% for 2017 and 2018 (row 4.c)

- a) Can SDG&E disaggregate the number of customers who were notified prior to the PSPS event and later de-energized (i.e., removing customers who were notified but not actually de-energized)? This value would always be *less than or equal to* the corresponding value provided in row 4.a. If so, please provide this as an additional row of data. If SDG&E cannot disaggregate this measure, please explain why not.
- b) Can SDG&E disaggregate the number of medical baseline customers who were notified prior to the PSPS event and later de-energized (i.e., removing customers who were notified but not actually de-energized)? This value would always be *less than or equal to* the corresponding value provided in row 4.b. If so, please provide this as an additional row of data. If SDG&E cannot disaggregate this measure, please explain why not.

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:

- a) Please refer to "Attachment B – WMP Tables 1-12_Revised 03-04-2021" for revised Table 11 metrics. SDG&E interprets notification metrics in Table 11 to count only those customers who received notification and were de-energized.
- b) Please refer to "Attachment B – WMP Tables 1-12_Revised 03-04-2021" for revised Table 11 metrics. SDG&E interprets notification metrics in Table 11 to count only those MBL customers who received notification and were de-energized.

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QUESTION 3:

For the most recent year currently available, please provide the average electric usage by month in kWh for residential customers residing in SDG&E's mountain climate zone. Please also provide the baseline allowance in place *at the time* for each month. Finally provide reference (AL-#) to each SDG&E consolidated rate filing or other implementation Advice Letter filing in place for Schedule DR during the year provided.

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:

	Advice Letter	Average Electric Usage ²	Baseline Allowance kWh/day ¹
1/1/2020	AL 3487-E	719	12.9
2/1/2020	AL 3500-E	553	12.9
3/1/2020	AL 3500-E	514	12.9
4/1/2020	AL 3514-E	573	12.9
5/1/2020	AL 3514-E	447	12.9
6/1/2020	AL 3536-E-A	456	13.6
7/1/2020	AL 3556-E	542	13.6
8/1/2020	AL 3556-E	663	13.6
9/1/2020	AL 3556-E	828	13.6
10/1/2020	AL 3619-E	612	13.6
11/1/2020	AL 3619-E	532	12.9
12/1/2020	AL 3619-E	567	12.9

- 1) Baseline allowance is for a Mountain customer in Schedule DR using basic service.
- 2) Average electric usage by bill month for Mountain climate zone customers on a single-family residential rate.

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QUESTION 4:

In Table 12 included in SDG&E's 2021 WMP filing, SDG&E reports that actual spend in 2020 capex for "Distribution communications reliability improvements" was \$35.5 million, and forecasts \$50.3 million in 2021, and \$70.9 million in 2022.

SDG&E's 2020 WMP mitigation plan forecasts spending between \$25.2 million and \$37.8 million each in both 2020 and 2021, and between \$33.2 million and \$49.8 million in 2022.

- a) Please provide any available workpapers substantiating the actual and forecast spend from SDG&E's 2021 WMP for the program discussed above.

As shown above, SDG&E's actual spending for 2020 was consistent with the high scenario outlined in SDG&E's 2020 forecasts, but the 2021 WMP forecasts for 2021 and 2022 are significantly higher than what was forecast in 2020. Please explain the variance between the 2020 and 2021 WMP forecasts.

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 4:

The "Distribution communications reliability improvements" mitigation activity consists of two programs, transmission fiber links and the LTE program.

The 2020 WMP forecast included the following components: Spectrum, RF Design, Field Build-out, Core Implementation. The variance in time and cost can be attributed to the following factors:

Cost:

- Change in Field Build-out site type: The Initial plan was based around a typical stand-alone telecom tower type. While this site type will still be utilized, the primary design type will now be an LTE/Distribution site.
 - o The variance in cost for the integrated LTE/Distribution is due to the increased specialized design effort to ensure safety enhancements which require retrofitting adjacent infrastructure due to the location of deployment in the High Fire Threat District. In addition, we have seen COVID-related pressures when it comes to the forecasted lead times and cost for material purchases.
- Variance in Spectrum cost:
 - o The value of Spectrum acquired was higher than forecasted and the payment schedule was shifted forward.

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Schedule:

- Variance in coverage expansion: The LTE/Distribution site has longer and more complex pre-build tasks (multiple design reviews and lead-times for engineered poles, and RF analysis); the deployment time-line is projected to have higher ramp up rates later than initially anticipated.
- The schedule of field build-out has to align within the overall efforts planned for the WMP program to lessen impacts to the community.

The attached file, “2021 WMP CalPA – DR7_Q4” has the spend breakout for the two programs for 2020-2022.

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QUESTION 5:

On pages (pp.) 270-274 of SDG&E's 2020 WMP, SDG&E discusses "Fuels management and reduction of 'slash' from vegetation management programs." On p. 273, SDG&E states that for the years 2019-2020, it granted "\$424k to eight (8) fuels treatment projects within the service territory including five (5) Native American reservations, two (2) community fire safe councils, and one (1) roadside fuel treatment test project."

SDG&E further states that for the years 2020-2021, "a \$500K fuels treatment grant was awarded to Fire Safe Council of San Diego County."

For the 2019-2020 fire season, SDG&E awarded grants to eight organizations summing to \$424,000. For the 2020-2021 fire season, SDG&E awarded a single \$500,000 grant. What was SDG&E's reasoning for changing course from providing several smaller grants to providing a single large grant?

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 5:

While the projects were all successfully completed, SDG&E found that the administration and oversight of the projects associated with the 2019 grants had the potential to become inefficient. SDG&E worked to find more efficient ways for the grant funds to benefit our customers. As opposed to changing course completely, SDG&E awarded the one larger grant to the Fire Safe Council of San Diego County which has experience working with small Fire Safe Councils and community groups within the service territory. The grant was awarded with the direction that the amount will be redistributed into smaller groups that are performing Fuels Management activities in areas associated with utility infrastructure.

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QUESTION 6:

On pp. 276-279 of SDG&E's 2021 WMP, SDG&E discusses "Other discretionary inspection of vegetation around distribution electric lines and equipment, beyond inspections mandated by rules and regulations." SDG&E states on p. 278 that program costs "were expanded as compared to what was estimated in the 2020 WMP."

- a) Please indicate to which program in the 2020 WMP the program referenced above corresponds.
- b) Did SDG&E provide a cost forecast in its 2020 WMP that is comparable in scope to the "other discretionary inspection..." program discussed at pp. 276-279 of the 2021 WMP? If so, please provide a page reference.
- c) If the program noted above does not have a direct precedent in the 2020 WMP, please state the basis of the statement that program costs expanded relative to the estimate in the 2020 WMP, and reference any available forecast from the 2020 WMP cycle which substantiates this.

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 6:

- a) The referenced programs include enhanced patrols and enhanced tree trimming activities within the HFTD.
- b) SDG&E provided a cost forecast to the referenced scope within its 2020 WMP in Appendix A, Tables 25 & 25A, pages 58-60. The scope defined in the 2021 WMP, however, was expanded to include clearances greater than 12 feet.
- c) The basis for the statement that program costs expanded above what was estimated in the 2020 WMP include:
 - In 2020 SDG&E began performing a second annual level-2 hazard tree patrol within the entire HFTD. Prior to 2020 this second annual hazard patrol was performed only in those VMAs where the routine-scheduled inspection activity occurs in the Fall in advance of the Santa Ana wind season.

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- Tree trim rates increased significantly beginning in 2020 in response to Senate Bill No. 247 enacted to bring wage parity between qualified line clearance tree trimmers and electrical utility linemen.
 - The total number of trees worked (trimmed and removed) within the HFTD increased significantly in 2020 versus 2019.

QUESTION 7:

In response to data request CalAdvocates-SDGE-2021WMP-01, question 4, SDG&E provided an attachment including column H, “Wildfire Risk Level.” This column provides an ordinal risk ranking of certain distribution circuits, according to SDG&E’s wildfire risk model.

Please provide a revised version of this spreadsheet with a new column that includes the raw wildfire risk score (i.e, the numerical output from the model) for each distribution circuit that is evaluated in SDG&E’s WiNGS risk model.

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 7:

The attached file, “2021 WMP - CalPA DR7 - Q7.xlsx” is a revised version of the spreadsheet previously provided in response to data request CalAdvocates-SDGE-2021WMP-01 question 4 with the addition of column I titled ‘Raw Wildfire Risk Score’. This column includes a numerical output from SDG&E’s WiNGS risk model for the evaluated 190 distribution circuits.

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QUESTION 8:

To what extent do SDG&E's HFTD tiers (non-HFTD, HFTD Tier 2, HFTD Tier 3) align with SDG&E's climate zones (coastal, inland, mountain)?

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 8:

SDG&E's climate zones and the HFTD tiers do not correlate as demonstrated in the attachment labelled "HFTD vs NWS".

The National Weather Service (NWS) issues forecasts and some watches and warnings for public zones which usually are the same as counties but in many cases are subsets of counties. Counties are subset into zones to allow for more accurate forecasts because of the differences in weather within a county due to such things as elevation or proximity to large bodies of water. In the case of SD county, SDG&E certainly has marked weather differences between coastal, inland, mountains, and deserts, especially in the summer. These zones are entirely based on the climate experienced in each location whereas the HFTD has more to do with the dead (sticks) and live (vegetation) fuels and the respective weather in the tiers.

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QUESTION 9:

Please provide a GIS layer showing labeled polygons for SDG&E's climate zones (coastal, inland, mountain).

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 9:

Please refer to the responsive GIS layer files labelled: "SDGE_ClimateZones.zip"