MUSSEY GRADE ROAD ALLIANCE DATA REQUEST: MGRA-SDGE-03
2021 WILDFIRE MITIGATION PLAN UPDATE
SDG&E RESPONSE

Date Received: February 17, 2021
Date Submitted: February 22, 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.

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 data requests are being issued to PG&E, SCE, and SDG&E.

The first set of data requests refer to the outage, risk event, and ignition data presented in Tables 2, 7.1, and 7.2 of the standard data tables, as well as the weather metrics for high wind warning (HWW) and Red Flag Warnings (RFW) found in Table 6.

IOUs are requested to provide an additional table using these data for the years 2015 through 2020. The following table provides a visual guide as to the format (for 2015 only – other years to be included in equivalent columnar format).

#	Outcome metric name	2015									
		HFTD Tier 2					HFTD Tier 3				
		Total	RFW	HWW	HWW&RFW	HWW&^RFW	Total	RFW	HWW	RFW&HWW	HWW&^RFW
1.a.	Number of all events with probability of ignition, including wires down, contacts with objects, line slap, events with evidence of heat generation, and other events that cause sparking or have the potential to cause ignition										
1.b.	Number of wires down (total)										
1.c.	Number of outage events not caused by contact with vegetation (total)										
1.d.	Number of outage events caused by contact with vegetation (total)										
7.c.ii.	Number of ignitions										

Events are to be classified in the following manner:

RFW: the event occurs within a National Weather Service Red Flag Warning perimeter during the time that the Red Flag Warning is active.

HWW: the event occurs within a National Weather Service High Wind Warning perimeter during the time that the High Wind Warning is active.

HWW&RFW: the event occurs in an area with simultaneously active High Wind Warning and Red Flag Warning.

HWW&^RFW: the event occurs in an area with an active High Wind Warning and NO simultaneous Red Flag Warning

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QUESTION 1:

Provide the "number of all events with probability of ignition, including wires down, contacts with objects, line slap, events with evidence of heat generation, and other events that cause sparking or have the potential to cause ignition", subdivided into the following categories: Year from 2015 to 2020, further subdivided into: High Fire Threat District Tier 2 and Tier 3, further subdivided into: Total, HWW, RFW, HWW and RFW, and HWW without RFW.

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:

Please refer to the attachment "2021 WMP MGRA-SDGE DR3 Q1-Q5.xlsx." SDG&E only provided transmission data within the total columns because transmission point of risk event is not tracked in the transmission outage database. Due to this gap in the data, SDG&E is unable to align with transmission risk event locations with the locations of HWW and RFW events.

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QUESTION 2:

Provide the number of wires down, subdivided into the following categories: Year from 2015 to 2020, further subdivided into: High Fire Threat District Tier 2 and Tier 3, further subdivided into: Total, HWW, RFW, HWW and RFW, and HWW without RFW.

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:

Please refer to the attachment "2021 WMP MGRA-SDGE DR3 Q1-Q5.xlsx." SDG&E only provided transmission data within the total columns because transmission point of risk event is not tracked in the transmission outage database. Due to this gap in the data, SDG&E is unable to align with transmission risk event locations with the locations of HWW and RFW events.

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QUESTION 3:

Provide the number of outages caused by vegetation, subdivided into the following categories: Year from 2015 to 2020, further subdivided into: High Fire Threat District Tier 2 and Tier 3, further subdivided into: Total, HWW, RFW, HWW and RFW, and HWW without RFW.

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:

Please refer to the attachment "2021 WMP MGRA-SDGE DR3 Q1-Q5.xlsx." SDG&E only provided transmission data within the total columns because transmission point of risk event is not tracked in the transmission outage database. Due to this gap in the data, SDG&E is unable to align with transmission risk event locations with the locations of HWW and RFW events.

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QUESTION 4:

Provide the number of outages not caused by vegetation, subdivided into the following categories: Year from 2015 to 2020, further subdivided into: High Fire Threat District Tier 2 and Tier 3, further subdivided into: Total, HWW, RFW, HWW and RFW, and HWW without RFW.

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:

Please refer to the attachment "2021 WMP MGRA-SDGE DR3 Q1-Q5.xlsx." SDG&E only provided transmission data within the total columns because transmission point of risk event is not tracked in the transmission outage database. Due to this gap in the data, SDG&E is unable to align with transmission risk event locations with the locations of HWW and RFW events.

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QUESTION 5:

Provide the number of ignitions, subdivided into the following categories: Year from 2015 to 2020, further subdivided into: High Fire Threat District Tier 2 and Tier 3, further subdivided into: Total, HWW, RFW, HWW and RFW, and HWW without RFW.

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:

Please refer to the attachment "2021 WMP MGRA-SDGE DR3 Q1-Q5.xlsx."

Regarding the use of the Technosylva fire spread model and its used to calculate wildfire consequences:

QUESTION 6:

What is the maximum duration in hours simulated used to model maximal losses using the Technosylva model?

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:

The maximum duration of a simulation using the Technosylva model is 24 hours.

QUESTION 7:

What is the average size of "maximal" wildfire spread in acres when the Technosylva model is run to its maximum duration?

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 model is run daily, and the size of simulated incidents are always variable and are highly dependent upon the weather at the exact location of the ignition. Simulations are run throughout the service territory and those simulation are compiled to inform decisions on fire potential. No average maximum size is created.

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QUESTION 8:

What is the typical computational time for a Technosylva run of "maximum" duration? Include assumptions regarding CPU type, speed and memory consumed.

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:

Typically, the model is run on either a Panasonic Toughbook or a mobile device. The computational time varies depending on the length of the model run and the severity of the burning conditions at the time of ignition. That said, typically the model run time does not exceed 1-2 minutes and usually the model results are available in under a minute. The model also has a feature that utilized the IRWIN database and simulates a fires from the coordinates of a wildland dispatch (this is not always the actual ignition point). These simulations are run for 2 hours and are available in a matter of seconds.

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QUESTION 9:

Have Technosylva fire spread simulations been run for 24 and 48 hour propagation times? If yes, how do the results compare to the results of 8 hour simulations in terms of average acres impacted and in terms of computing resources? If not, why has this not been performed?

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 9:

Through the testing and development of the program, fires were run for all available durations. However, 24 hour simulations are rarely performed as it would be extremely unusual for a fire to burn for 24 hours without some amount of suppressive action. In the instances that SDG&E has run the model for 24 hours, the acres impacted are highly dependent upon the weather conditions.

During SDG&E's normal operational application of the model, the exact length of single model runs is based on expected burning conditions and suppressive resources available at the time of ignition. For general simulation and/or training a 2, 4, or 8 hour simulation is used.