

MUSSEY GRADE ROAD ALLIANCE DATA REQUEST: MGRA-SDGE-06
2021 WILDFIRE MITIGATION PLAN UPDATE
SDG&E RESPONSE

Date Received: March 17, 2021
Date Submitted: March 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.

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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

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

QUESTION 1:

How is the duration of the simulation determined for risk calculations used to prioritize circuit risks for mitigation? Is there a maximum / default duration of simulation for this purpose and if so what is it?

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 6, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 1:

The duration of all wildfire simulations performed by Technosylva and used in WiNGS was 8 hours, in all situations. Future models may have different applications of duration.

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QUESTION 2:

Is there a maximum wildfire size used for simulation determined for risk calculations used to prioritize circuit risks for mitigation and if so what is it?

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 6 and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 2:

No, there is no maximum wildfire size used.

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QUESTION 3:

How are weather and fuel inputs determined for risk calculations used to prioritize circuit risks for mitigation?

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 6, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 3:

The current version of WiNGS, which is used for prioritizing and scoping projects, considers weather and fuel in two places:

- (1) The consequence values of potential wildfires that were calculated by Technosylva contained weather and fuel scenarios. The worst case of fire spread that was derived from those scenarios was used as an input in WiNGS.
- (2) The likelihood of a wildfire was modified to account for the highest recent wind gust measured on each segment. Together, these inputs help shape the overall wildfire risk calculations on each segment.

QUESTION 4:

How is the duration of the simulation determined for risk calculations used to identify circuits for PSPS? Is there a maximum / default duration of simulation for this purpose and if so what is it? Or does the duration of the simulation extend to the projected length of the weather event?

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 6, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 4:

The duration of all wildfire simulations performed by Technosylva and used in WiNGS was 8 hours, in all situations. Future models may have different applications of duration.

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QUESTION 5:

Is there a maximum wildfire size used in simulations to identify circuits for PSPS and if so what is it?

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 6, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 5:

No, there is no maximum wildfire size used.