

**THE UTILITY REFORM NETWORK (TURN) DATA REQUEST: TURN-SDGE-02
2021 WILDFIRE MITIGATION PLAN UPDATE
SDG&E RESPONSE**

Date Received: February 25, 2021

Date Submitted: March 2, 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

QUESTION 1:

Please provide in Excel the number of utility distribution wood poles segregated by size class (ANSI O5.1 – 2017) separately for HFTD and non-HFTD areas, as they were at the end of 2018, 2019 and 2020. Please also provide the number of non-wood poles. Please use the following spreadsheet design, with separate sheets for each year. Please contact TURN if a different format would be more appropriate.

Pole	Number of distribution poles at end of 2020			
	HFTD Tier 1	HFTD Tier 2	HFTD Tier 3	non-HFTD
Class				
Wood Poles				
10				
9				
8				
7				
6				
5				
4				
3				
2				
1				
H1				
H2				
H3				
H4				
H5				
H6				
Non-Wood Poles				
Steel				
Composite				
Other **				
Unknown				
** Please identify any other classification				

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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:

SDG&E's GIS system is a live system and does not maintain historical versions. For this reason, SDG&E utilized a historical quarterly GIS report to provide distribution pole counts for end of year 2018 and 2019. The historical report provides summary pole count data by material type but does not include poles identified by classification.

For an approximation of 2020 year end data, SDG&E ran a report on its current system configuration as of February 26, 2021. The queries for this report were written specific to this data request to provide the best data available including pole classification data broken out by High Fire Threat District (HFTD) tier. Please note that within SDG&E's service territory the HFTD Tier 1 falls within the HFTD Tier 2 and Tier 3. To avoid double counting all data is grouped within Tier 2 and Tier 3.

It is important to note that the queries used to generate the historical GIS report do not exactly match the wording of this request. The historical report filters out all poles that do not have a recorded material or voltage. The report also excludes circuits that are identified as neutral, dead, or related to the SDG&E's Skills Training Center. Finally, the historical report includes transmission poles with distribution underbuilt. Due to these differences in queries between the historical reports and the current system report, there is a gap in the total number of poles reported between end of year 2019 and February 26, 2021.

With this in mind, please refer to the tables below for number of distribution poles at the end of 2018, 2019, and as of February 26, 2021:

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Pole Class	Number of distribution poles at end of 2018			
	HFTD Tier 1*	HFTD Tier 2	HFTD Tier 3	Non-HFTD
Grand Total		39382	35010	111523
Wood Poles Total		33828	26923	109335
10				
9				
8				
7				
6				
5				
4				
3				
2				
1				
H1				
H2				
H3				
H4				
H5				
H6				
Unknown				
Non-Wood Poles Total		5554	8087	2188
Steel		5547	8080	2163
Composite (Fiberglass)		7	7	25
Unknown		0	0	0

* SDG&E does not track the HFTD Tier 1.

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Pole Class	Number of distribution poles at end of 2019			
	HFTD Tier 1*	HFTD Tier 2	HFTD Tier 3	Non-HFTD
Grand Total		39386	34962	110763
Wood Poles Total		32745	25367	107995
10				
9				
8				
7				
6				
5				
4				
3				
2				
1				
H1				
H2				
H3				
H4				
H5				
H6				
Unknown				
Non-Wood Poles Total		6641	9595	2768
Steel		6634	9586	2739
Composite (Fiberglass)		7	9	29
Unknown		0	0	0

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Pole Class	Number of distribution poles at 2/26/2021			
	HFTD Tier 1*	HFTD Tier 2	HFTD Tier 3	Non-HFTD
Grand Total		43397	37318	126795
Wood Poles		36292	26398	124879
10		0	0	0
9		0	0	0
8		0	0	0
7		147	166	705
6		320	154	829
5		10998	8064	42926
4		231	189	1467
3		12987	11955	32588
2		207	152	1473
1		6003	3810	37463
H1		0	0	0
H2		0	0	0
H3		0	0	0
H4		0	0	0
H5		0	0	0
H6		0	0	0
Unknown		5399	1908	7428
Non-Wood Poles		7105	10920	1916
Steel		7095	10905	1869
Composite (Fiberglass)		10	14	46
Unknown		0	1	1

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QUESTION 2:

Please provide the total number of distribution poles a) removed and b) installed in Tiers 2 and 3, similarly segregated by size class.

OBJECTION:

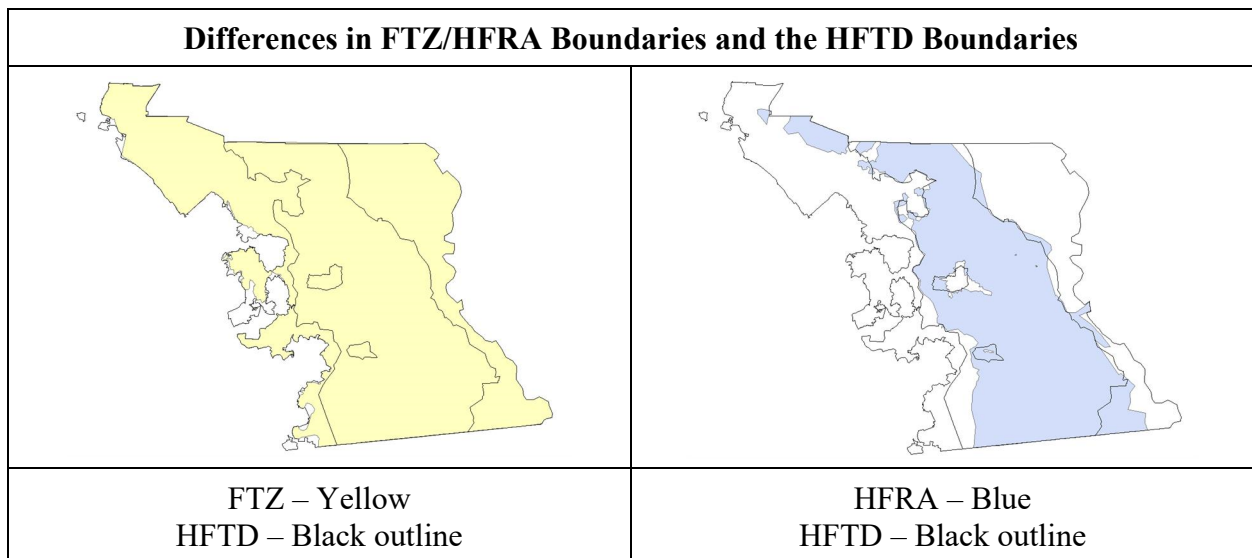
SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 2:

SDG&E’s GIS system is a live system and does not maintain historical versions. Although SDG&E has a list of structures that were removed as part of wildfire mitigation projects, because the structures no longer exist in GIS, spatial queries cannot be run against these structures.

For this reason, SDG&E has utilized a historical quarterly GIS report to provide distribution pole counts for 2017 YE – 2020 YE. The historical report does not include removal or installation data but does provide summary pole count data. The historical report also does not include poles by classification. For this response, SDG&E compared pole totals year to year to show net addition/removal per HFTD tier per year.

Due to differences in reporting between 2017 and 2018, namely the shift from Fire Threat Zones (FTZ)/High Fire Risk Area (HFRA) classifications to HFTD Tiers, 2017 YE and 2018 YE distribution pole numbers are provided. These two summary pole counts represent distinct areas and are not comparable for net addition/removal calculation for 2018 YE. Please refer to the images below for an FTZ/HFRA and HFTD boundary comparison.



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Pole	Number of distribution poles at year end			
		FTZ	HFRA	Non-FTZ
2017 YE Total		72481	34921	114178
	HFTD Tier 1*	HFTD Tier 2	HFTD Tier 3	Non-HFTD
2018 YE Total		39382	35010	111523
2019 YE Total		39386	34962	110763
2019 Net Addition/Removal		-4	48	760
2020 YE Total		39299	34750	110405
2020 Net Addition/Removal		87	212	358

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QUESTION 3:

Please provide the number of overhead distribution circuit miles located in Tiers 1, 2 and 3 and non-HFTD areas, at the end of each year 2018, 2019 and 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 3:

SDG&E's GIS system is a live system and does not maintain historical versions. For this reason, SDG&E has utilized a historical quarterly GIS report to provide OH distribution circuit miles for the end of each year 2018, 2019, and 2020.

Miles	Number of distribution OH circuit miles at year end			
	HFTD Tier 1*	HFTD Tier 2	HFTD Tier 3	Non-HFTD
2018		1825	1664	3013
2019		1826	1659	2993
2020		1818	1648	2984

* SDG&E does not track the HFTD Tier 1.