

WILDFIRE SAFETY DIVISION DATA REQUEST: WSD-SDGE-01
2021 WILDFIRE MITIGATION PLAN UPDATE
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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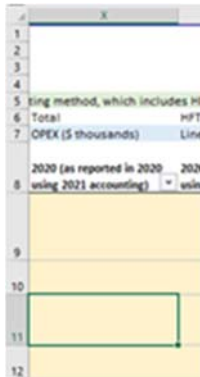
III. RESPONSES

QUESTION 1:

The WSD requests clarification of two (2) overarching issues regarding the 2021 WMP Update Table 12 (initiative spend by WMP activity), as follows:

1. Split reported spend by activity in HFTD and total activity spend (i.e., territory-wide including in non-HFTD)
2. Given changes in WMP activity spending, report planned spend as detailed in the 2020 WMP under the reporting system of the 2021 WMP (i.e., activity spend in HFTD and territory-wide)

The WSD provides the attached MS Excel file and additional clarifications for use in responding to this request. In the attached Excel file, fill out the columns highlighted in tan (see color in row 11 column X below):



Columns U through AR request planned spend “as reported in 2020 using 2021 accounting.” This means to report the spend for each year of the WMP cycle (i.e., 2020-2022) as planned in the 2020 WMP, but reported for both HFTD areas and the total territory (including non-HFTD areas), as was required in the 2021 WMP. Activity spend in HFTD areas should go into the “HFTD” columns (marked in row 6 as “HFTD”), while a territory wide activity spend (non-HFTD and HFTD) should go into the “Total” columns (marked in row 6 as “Total”). If known, provide the value of line miles treated and/or alternative units corresponding to each activity, region scope (i.e., HFTD or Total), and year.

Columns AS through BP request spend (actual in 2020, planned in 2021 and 2022) split by activity in HFTD (columns marked in row 6 as “HFTD”) and territory-wide including HFTD and non-HFTD (columns marked in row 6 as “Total”). The “Total” columns are already populated with the values reported in the 2021 WMP. If known, provide the value of line miles treated and/or alternative units corresponding to each activity and year for the HFTD columns.

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Provide a completed copy of this MS Excel with the columns highlighted in tan populated with accurate information by Tuesday February 23, 2021 at 5 p.m. Keep the title of the file unchanged except for the date, which shall reflect the date of submission in YYYYMMDD format.

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 attachment “Data request SDGE 2021 Table 12_v02 20210223.xlsx.”

Please note SDG&E marked several initiatives that are foundational in nature with an N/A in column T. These initiatives support company initiatives within the HFTD, but cannot be quantified in a way that allows for a split by HFTD and non-HFTD.

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QUESTION 2:

Provide an update to Metric 1.c. in Table 11. In its 2021 WMP SDGE reported hours of PSPS rather than total customer hours in Table 11 Metric 1.c. Accordingly, provide either:

- Confirmation that Metric 2.a. in Table 11 is representative of all customer hours from PSPS, or
- An updated Table 11 Metric 1.c. that reports total customer hours of PSPS.

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 “Attachment B – WMP Tables 1-12_Revised 02-23-2021” for an updated metric in section 1.c., as directed by WSD. The updated value represents total PSPS customer hours.

In addition, SDG&E submits updates to metrics 1.b., 3.a., 4.a., 4.b., 4.c., 4.d., 4.e., 4.f., 5.b., 5.c., 5.e. Due to the ongoing audit process of all system outages, including PSPS, and in reviewing Table 11 in response to this data request, SDG&E discovered one outage was inadvertently omitted from initial calculations when Table 11 was submitted on February 5, 2021, thus under-reporting 753 customers on one circuit segment. The identified outage and switch plan has now correctly been classified as a PSPS event and is being reported in this revised Table 11.

The values provided by SDG&E represent the most current PSPS data available at the time of submission. These values should still be considered preliminary and subject to change upon further audits and analysis.

Upon further review of Table 11, SDG&E discovered inadvertent errors in the historical metrics (4c, 4d, 4e and 4f) for years 2017 and 2018, which are corrected in the attached.

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QUESTION 3:

In Section 6.2, Attachment B, Table 2 (Recent Performance on Outcome Metrics, last 5 years), “6. Acreage burned by utility-ignited wildfire,” there are no data. The 2020 WMP provided these data for 2015-2019, but SDG&E left this row blank in their 2021 WMP update. Are there updated numbers for 2020 acres burned?

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 has included the acreage burned for 2015-2019 in the attached “Attachment B – WMP Tables 1-12_Revised 02-23-2021.” The total 2020 acres burned is 12.57.