WILDFIRE SAFETY DIVISION DATA REQUEST: WSD-SDGE-06
2021 WILDFIRE MITIGATION PLAN UPDATE
SDG&E RESPONSE
Date Received: March 29, 2021
Date Submitted: April 1, 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

Resubmitting this question not answered in the written response received March 17 (WSD-SDGE-03 Q2[d])

QUESTION 1:

How many inflight projects (by circuit mile) did not have redesign costs, and were those shifted to either covered conductor or strategic undergrounding projects?

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:

Redesigning inflight projects inherently results in redesign costs. In 2020, SDG&E reevaluated current bare conductor projects and began the redesign of 2 miles for 2020, 23 miles for 2021, and 17 miles for 2022. Those redesigns had costs associated with them. At present, no further redesigns of bare conductor projects are expected in our 2021 and 2022 workplans and as such no costs for redesigns are anticipated for those years.

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QUESTION 2:

SDG&E states in response to WSD-SDGE-03 Q12(b) that "[t]he first version of WiNGS model only uses the financial consequence from Technosylva." Please clarify:

   2(a). Why does SDG&E only use financial consequence from the Technosylva model?

   2(b). What other outputs are available for SDG&E to use from the Technosylva model?

   2(c). When does SDG&E intend to implement additional consequence from Technosylva within the WiNGS model? Which consequences does this include?

   2(d). How does SDG&E account for other consequences of wildfires besides the financial consequences (e.g., property, life, environmental, etc.) in its risk quantification framework?

   2(e). How does SDG&E use the other consequences described in Q2(d) (above) in its decision making?

   2(f). How are the other consequences described in Q2(d) reflected within the WiNGS model?

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:

2(a) The original Technosylva WRRM model only outputted financial consequences. As described further in 2(c), updates to the model that will be undertaken this year will provide more attributes in the consequence analysis.

2(b) As described in 2(a), the original Technosylva WRRM model only provided financial consequence outputs.

2(c) SDG&E is working with Technosylva this year to update the model to provide additional consequence data points; these will likely include acres burned, population at risk, structures at risk among other variables that will be further discussed as the project evolves.

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2(d) SDG&E's risk quantification framework (RQF) includes the attributes of safety, reliability, financial, and stakeholder satisfaction. The WiNGS model addresses each of these attributes. The values used for the safety, reliability, and stakeholder satisfaction attributes are based on the financial values from the WRRM. The logic for using the financial attribute is because the financial value in the WRRM output specifically measures aspects of structures being destroyed. The logic follows that as more structures are destroyed there will also be an increase in the consequences of safety, reliability, and stakeholder satisfaction. Future versions of WiNGS will include improved modeling for each RQF attribute.

2(e) SDG&E's wildfire risk evaluation considers all the attributes in SDG&E's RQF as described above in the Response to 2(d). The RQF allows SDG&E to create a risk score which is then used to estimate RSEs, which are then used to inform decision-making.

2(f) SDG&E's wildfire risk evaluation considers all the attributes in SDG&E's RQF as described above in the Response to 2(d). Consequences from both wildfire risk and PSPS risk for each segment are evaluated. In the WiNGS model, each segments' RQF attributes are estimated and displayed for inquiry. The RQF is then used to compile an "inherent" risk score which considers both the wildfire and PSPS aspects of risk. Inherent risk can be thought of as the existing risk with current assets and current operating protocols in place. Next, WiNGS considers various mitigations for each segment, and a new set of consequences are estimated, resulting in a post-mitigation risk score. With that data available, various analysis can be performed including the estimation of RSE scores per segment per mitigation.

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QUESTION 3:

In SDG&E's presentation at the 2/22/21 workshop and in follow-up conversations, SDG&E indicated that its WiNGS model builds on its WRRM model. Specifically, SDG&E stated that the WRRM asset risk analysis is integrated into WiNGS' segment risk analysis. Please explain specifically what aspects of the WRRM model are integrated into the WiNGS model, including, but not limited to, the following questions:

   3(a). What specific outputs from the WRRM model are integrated into the WiNGS model?

   3(b). How are the outputs from the WRRM model used in the WiNGS model?

   3(c). At the 2/22/21 workshop, SDG&E indicated that the WiNGS model uses the WRRM model consequences at every pole/asset and aggregates that data for circuit segments. Are the WRRM model consequences at every pole determined by the Technosylva consequence model? If not, how does the WRRM model determine consequence at each pole/asset?

   3(d). Does the WiNGS model use the WRRM's probability of ignitions models or probability of ignitions models' outputs in any way?

       3(d)i.   If so, describe how.

       3(d)ii. If not, describe how the WiNGS model assesses the probability of ignition, including all inputs and assumptions, for:

           3(d)ii.1. Vegetation-related ignitions

           3(d)ii.2. Equipment-related ignitions

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.

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RESPONSE 3:

3(a) Currently, SDG&E integrates the WRRM conditional impact (consequence value) into the WiNGS model.

3(b) Conditional impacts from WRRM are provided for every pole on any given segment in WiNGS. In the current version of the model, the pole that has the highest conditional impact score (highest consequence) on that segment is used as a proxy to estimate the potential consequence for the whole segment. The conditional impact value is then converted into the risk point calculation using the RQF attributes described above.

3(c) Yes, the WRRM model consequences at every pole are determined by the Technosylva consequence model. However, to clarify how this data is being used, the current version of WiNGS does not aggregate individual asset consequence scores but rather takes the maximum consequence score across all the poles on a given segment. Future versions of WiNGS will further refine this methodology.

3(d) Yes, the current version of WiNGS utilizes the conductor failure rate from WRRM to assist in the estimate of the likelihood of an ignition occurring on each segment. Regarding vegetation-ignitions, SDG&E also uses data from its vegetation management program (specifically tree strike potential data) on every segment to estimate the likelihood of ignition due to vegetation risk. Regarding equipment-related outages, SDG&E estimates the likelihood of faults occurring by considering the amount of OH system, and the level of hardening of that system, for each segment.