

WILDFIRE SAFETY DIVISION FOLLOW UP REQUEST: WSD-SDGE-01
2021 WILDFIRE MITIGATION PLAN UPDATE
SDG&E RESPONSE

Date Received: February 9, 2021
Date Submitted: February 16, 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:

Identify where in the WMP Update we can find how target metrics and performance metrics for 2020 compared, and how this comparison informed the current wildfire mitigation plan.

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:

Target metrics and performance metrics were not directly compared in SDG&E's 2021 WMP Update. In response to data request from the Public Advocates Office, SDG&E recently prepared an expanded WMP Table 5.3 to directly compare its 2020 targets and performance. Please refer to the attached "2021WMP CalPA-SDGE DR1 Q10."

As discussed with the Wildfire Safety Division (WSD) on February 10, 2021, comparing target metrics and performance can inform the Wildfire Mitigation Plan in a few ways. Some targets, such as SDG&E's Corrective Maintenance Program (CMP) inspections, are cyclical in nature and will not change based on performance. Other targets are based upon completing a certain amount of work during the three-year WMP cycle. For these targets, the past performance will inform whether the program needs to be accelerated or decelerated in future years to meet the goal of the full three-year cycle. Lastly, some targets are created for new programs that require time to ramp up. The performance related to these targets will inform the plan moving forward as SDG&E has the opportunity to get these programs in place, understand obstacles that arise, and see how quickly these targets can accelerate.

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QUESTION 2:

Identify where in the WMP Update we can find a prioritized list of wildfire risks with accompanying descriptions of these risks, including their main drivers.

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 list of wildfire risks is included in WMP Table 7.1. The overall ranking of those risks across transmission and distribution is provided below. It is important to note that SDG&E's mitigation initiatives attempt to address overall ignition risks regardless of how the causes are prioritized year-to-year. This is due to the fact that ignition causes could vary year-to-year which would make it challenging and inefficient to shift programs frequently. Additionally, the consequences of ignitions could be as catastrophic regardless of whether an ignition cause is ranked at the top or at the bottom of a list in any given year. SDG&E's goal is to lower the overall ignition potential across all cause categories. When looking at the top causes of ignitions at SDG&E, it's important to consider factors that could be influencing those types of ignitions. For example, while vehicle and balloon contacts are at the top of the list for SDG&E, however, both are customer driven contacts and are not a result of equipment failure, a lack of maintenance, high winds, animal contacts or vegetation contacts. More specifically, balloon contacts result from customers releasing conductive metallic foil balloons into the air ("foil" balloons, and often referred to as Mylar® balloons) while vehicle contacts are typically a result of human error that leads to a crash into a facility. This means that these two types of ignitions are adversely impacted by having a large population density.

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Cause category (final)	Sub-cause category (final)	Average Outage (2015 - 2019)	Average Ignition rate (Sum of Ignitions / Sum of Outages)	Adjusted Risk (Avg. Outage x Ignition Rate)	Risk Ranking
Contact from object	Vehicle contact	97.8	3.58%	3.50	1
Contact from object	Balloon contact	97.7	3.41%	3.33	2
Contact from object	Veg. contact	40.8	6.12%	2.50	3
Equipment / facility failure	Other	12.0	13.89%	1.67	4
Equipment / facility failure	Connection device damage or failure	50.3	2.98%	1.50	5
Contact from object	Other contact from object	33.5	4.48%	1.50	6
Equipment / facility failure	Lightning arrestor damage or failure	24.3	5.48%	1.33	7
Contact from object	Animal contact	80.0	1.46%	1.17	8
Equipment / facility failure	Conductor damage or failure	41.0	2.44%	1.00	9
Equipment / facility failure	Transformer damage or failure	53.8	1.55%	0.83	10
Equipment / facility failure	Switch damage or failure	13.5	4.94%	0.67	11
Unknown	Unknown	329.7	0.15%	0.50	12
Equipment / facility failure	Fuse damage or failure	73.2	0.68%	0.50	13
Wire-to-wire contact	Wire-to-wire contact / contamination	4.2	12.00%	0.50	14
Equipment / facility failure	Anchor / guy damage or failure	1.7	30.00%	0.50	15
Equipment / facility failure	Capacitor bank damage or failure	9.0	3.70%	0.33	16
Vandalism / Theft	Vandalism / Theft	1.2	28.57%	0.33	17
Equipment / facility failure	Crossarm damage or failure	21.7	0.77%	0.17	18
Equipment / facility failure	Pole damage or failure	35.2	0.47%	0.17	19
Equipment / facility failure	Insulator and brushing damage or failure	6.3	0.00%	0.00	20
Utility work / Operation	Utility work	5.2	0.00%	0.00	21
Equipment / facility failure	Recloser damage or failure	1.5	0.00%	0.00	22
Contamination	Contamination	0.5	0.00%	0.00	23
Equipment / facility failure	Voltage regulator / booster damage or failure	0.5	0.00%	0.00	24
Other	All Other	0.0	0.00%	0.00	25
Equipment / facility failure	Sectionalizer damage or failure	0.0	0.00%	0.00	26