

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of San Diego Gas & Electric Company
(U 902 E) for Recovery of Undercollection
Recorded in the Tree Trimming Balancing
Account.

Application 20-07-003
(Filed July 1, 2020)

**JOINT MOTION OF THE PUBLIC ADVOCATES OFFICE
AT THE CALIFORNIA PUBLIC UTILITIES COMMISSION
AND SAN DIEGO GAS & ELECTRIC COMPANY TO ACCEPT RECORDS INTO
EVIDENCE**

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CALIFORNIA PUBLIC UTILITIES
COMMISSION**

February 12, 2021

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Pursuant to Rules 11.1 and 13.8(c) of the California Public Utilities Commission’s (“Commission” or “CPUC”) Rules of Practice and Procedure, the Joint Case Management Statement filed January 19, 2021, and the Administrative Law Judge’s email, dated January 20, 2021, Taking Evidentiary Hearings Off-Calendar, the Public Advocates Office at the California Public Utilities Commission (“Cal Advocates”) and San Diego Gas & Electric Company (“SDG&E”) (jointly “Parties”) respectfully file this Joint Motion to Accept Records into Evidence (“Motion”).

The Parties hereby move the Commission to receive the following records into evidence in this proceeding:

- Exhibit 01 – SDG&E Prepared Direct Testimony of Don Akau in support of Application, dated July 1, 2020;
- Exhibit 02 – SDG&E Prepared Direct Testimony of Claire F. Olegario in support of Application, dated July 1, 2020;
- Exhibit 03 – Cal Advocates Prepared Testimony of Ryan Andresen (Recovery of 2019 Undercollected Balance in the Tree Trimming Balancing Account), dated December 8, 2020;
- Exhibit 04 – Cal Advocates Prepared Testimony of Tamara Godfrey (Executive Summary), dated December 8, 2020;

- Exhibit 05 – SDG&E Rebuttal Testimony of Michael Daleo, dated January 8, 2021;
- Exhibit 06 – SDG&E Rebuttal Testimony of Tyson Swetek, dated January 8, 2021;
- Exhibit 07 – Data Request (DR): PubAdv-SDG&E-001-RYD, dated July 22, 2020;
- Exhibit 08 – DR: July 22, 2020 Email requesting workpapers;
- Exhibit 09 – SDG&E DR responses. Dated July 27, 2020 email stating no workpapers; August 19, 2020 (Q. 1, 3-12); August 21, 2020 (Q.2); October 2, 2020 (Supplemental Responses);
- Exhibit 10 – DR: PubAdv-SDG&E-003-RYD, dated August 7, 2020;
- Exhibit 11 – SDG&E DR responses dated August 21, 2020; Supplemental responses on October 2, 2020;
- Exhibit 12 – DR: Follow up Emails dated September 3, 11, 15 and 16, 2020;
- Exhibit 13 – DR: PubAdv-SDG&E-004-RYD, dated September 2, 2020;
- Exhibit 14 – SDG&E DR responses dated October 23, 2020 Q.6;
- Exhibit 15 – DR: PubAdv-SDG&E-005-RYD, dated September 25, 2020;
- Exhibit 16 – SDG&E DR responses dated October 23, 2020 Redacted;
- Exhibit 17 – DR: Follow up Emails dated October 27, 28, 2020;
- Exhibit 18 – DR: PubAdv-SDG&E-006-RYD dated October 30, 2020;
- Exhibit 19 – SDG&E DR responses dated November 9, 2020 (Q.3-6) and November 16, 2020 (Q.1-2);
- Exhibit 20 – DR: PubAdv-SDG&E-007-RYD dated January 11, 2021; and
- Exhibit 21 – SDG&E responses dated January 26, 2021.

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Exhibits 01 through 21 are attached to this Joint Motion to Accept Records into Evidence. The Testimony exhibits described above have been served prior to the filing of this Motion on Administrative Law Judge Elaine Lau and the parties to the service lists.

Respectfully submitted,

/s/ John T. Van Geffen

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February 12, 2021

Exhibit 01

SDG&E Prepared Direct Testimony of Don Akau in support
of Application, dated July 1, 2020

Company: San Diego Gas & Electric Company (U 902-E)
Proceeding: 2019 Tree Trimming Balancing Account
Application: A.20-07-____
Exhibit: SDG&E-01

SAN DIEGO GAS & ELECTRIC COMPANY
PREPARED DIRECT TESTIMONY OF
DON AKAU

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



July 1, 2020

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1 **PREPARED DIRECT TESTIMONY OF DON AKAU**
2 **ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**

3
4 **I. INTRODUCTION**

5 My name is Don Akau. I am the Vegetation and Pole Integrity Manager at San Diego
6 Gas & Electric Company (“SDG&E”). My qualifications are attached to this testimony as
7 Section V of this testimony. My business address is 8315 Century Park, San Diego, CA 92123.

8 As Vegetation and Pole Integrity Manager, I am responsible for developing,
9 implementing and managing SDG&E’s Vegetation Management Program (“Program”). As the
10 Program Manager and a certified arborist, I strive to ensure public safety, compliance with all
11 rules and regulations and to preserve the health and safety of our Urban and Rural forested lands.
12 Trees and vegetation are critical to the balance of the ecosystem and I am proud to be an arborist
13 in a position to find positive solutions where trees and the utilities can co-exist in a sustainable
14 manner.

15 The purpose of my testimony is: (1) to describe SDG&E’s Vegetation Management
16 Program; (2) address SDG&E’s 2019 expenditures on vegetation management, specifically
17 spending associated with the Tree Trimming Balancing Account (“TTBA”); and (3) explain
18 why, despite prudent cost-management efforts, SDG&E’s 2019 expenditures recorded to the
19 TTBA exceeded the amount authorized in Decision (“D.”) 19-09-051 (“2019 GRC Decision”),
20 SDG&E’s 2019 General Rate Case (“GRC”).

21 Generally, SDG&E’s TTBA expenditures have increased as a result of enhanced
22 vegetation management practices with respect to wildfire mitigation and reduction of Public
23 Safety Power Shutoff (“PSPS”) events, including the identification and removal of more hazard
24 and reliability trees; enhanced audits in the High Fire Threat District (“HFTD”), resulting in
25 additional workloads and tree removal; and increased labor costs as a result of a surge in demand

1 for certified arborists and tree work statewide. SDG&E addressed the potential for increased
2 costs in its 2019 GRC and requested the two-way balancing account in lieu of forecasting
3 unpredictable cost increases.¹

4 In Section II, I describe SDG&E's Vegetation Management Program, applicable laws and
5 regulations, and changes to the Program as a result of the 2019 Wildfire Mitigation Plan and
6 other risk mitigation efforts. I also note that SDG&E's Vegetation Management Program has
7 successfully reduced tree-caused outages and enhanced reliability. In Section III, I discuss the
8 specific drivers of SDG&E's 2019 expenditures recorded to the TTBA. SDG&E submits that it
9 reasonably incurred the costs at issue in this Application because they arose from enhanced
10 wildfire mitigation activities intended to promote safety, and due to circumstances outside of
11 SDG&E's control, such as labor market changes. Further, SDG&E prudently managed its
12 spending on vegetation management through its use of long-term contracts, competitive pricing
13 for tree-trimming work, and internal audit practices.

14 **II. SDG&E'S VEGETATION MANAGEMENT PROGRAM**

15 The Vegetation Management Program is responsible for inspecting and maintaining an
16 inventory of approximately 460,000 trees that have the potential to encroach within the minimum
17 required compliance distance between vegetation and overhead power lines. The Program also
18 coordinates all vegetation management activities, which are primarily performed by third-party
19 contractors. SDG&E's tree inventory database and work management system are collectively
20 managed through the PowerWorkz system, a web-based application and database. Vegetation
21 management is integral to both reliability as well as wildfire prevention and mitigation efforts.
22 All trees in the database are monitored using known species growth rates, with additional

¹ See A.17-10-007, Second Revised SDG&E Direct Testimony of William H. Speer (May 7, 2018).

1 consideration given to the amount of rainfall occurring during periods affecting overall tree
2 growth, as well as past pruning practices. SDG&E also utilizes its vegetation management data,
3 including the tree inventory database, outage history, and meteorological data, to develop a
4 Vegetation Risk Index of the highest tree-risk areas of its service territory. The goal of this
5 initiative is to leverage data and intelligence to gain additional insights on how atmospheric
6 conditions impact the growth rates of certain species and to identify certain high-risk vegetation
7 areas.

8 Tree trimming work includes pruning healthy trees growing into overhead power lines as
9 well as the pruning or removal of dead, dying, diseased, or structurally unsound trees with the
10 potential to fall into overhead lines. SDG&E’s tree-trimming activities are covered by a two-
11 way balancing account, as approved by the Commission in the 2019 GRC Decision.²

12 SDG&E is responsible for compliance with General Order (“GO”) 95, Rule 35; Public
13 Resources Code, sections 4292 and 4293; and NERC FAC-003. These rules and regulations
14 mandate a minimum clearance between vegetation and SDG&E facilities. SDG&E’s Vegetation
15 Management Department sets the standards, guidelines, and processes for the overall Program to
16 comply with all applicable rules, laws and regulations. Additionally, the Department oversees
17 compliance with SDG&E’s Wildfire Mitigation Plans as approved by the Commission. The
18 Vegetation Management Department includes a staff of Team Leads, Area Foresters, Contract
19 Administrators, Quality Assurance Specialists, Technical Support, and Customer Service
20 Administration Staff.

21 SDG&E strives to be a leader in sustainable vegetation management. SDG&E has
22 routinely been recognized by the National Arbor Day Foundation as a “Tree Line USA” utility

² D.19-09-051 at 266-267.

1 company in recognition of “best practices” combining worker education and training, public
2 outreach, quality tree care, and system reliability. SDG&E’s vegetation management practices
3 have received numerous recognitions over the years from a variety of agencies, cities, schools,
4 and international organizations. The Program strives to engage all stakeholders in raising the bar
5 to promote public and employee safety. And the Program is also focused on sustainability,
6 leveraging its “Right Tree Right Place” program to improve the urban landscape, and using
7 opportunities to repurpose biomass and reduce the Program’s environmental footprint.

8 **A. General Inspection and Pruning Activities**

9 Generally, two types of work drive tree trimming program costs: (1) routine work and (2)
10 field memo and hazard tree work. Routine work includes the annual cycle pruning and removal
11 of trees. Pre-inspection contractors perform the overhead power line patrols which identify trees
12 to be pruned and removed. During pre-inspection activity, trees in proximity to SDG&E’s
13 powerlines are inspected and evaluated and field inspectors update the tree inventory database
14 accordingly. Each Program tree is visited at least once per cycle. The annual inspections include
15 routine maintenance and hazard tree assessments to verify that trees will remain compliant for
16 the duration of the cycle and/or are pruned to standards and clearances. Trees that will not
17 remain compliant or that have the potential to impact powerlines within the annual pruning cycle
18 are identified and assigned to the tree contractor to work. Routine tree pruning and removal is
19 typically done by a contractor and compensated on a contractually negotiated unit price basis.

20 Field memos include reactive and unscheduled tree pruning, including customer refusals,
21 hazard tree pruning and removal, environmentally and culturally sensitive pruning activities,
22 trees which require priority pruning, district requests, and customer safety checks. Emergency
23 pruning occurs when a tree requires immediate attention to clear an infraction or poses an
24 imminent threat to electrical facilities. Due to the varied nature of these orders, this type of work

1 is performed by contractors and compensated on a Time & Equipment (“T&E”) basis. While
2 T&E rates are contractually negotiated, these rates are typically higher than work completed on a
3 unit price basis, due to the complexity and non-routine nature of the projects. Generally, tree-
4 trimming unit price costs can start at approximately \$522 for a reliability trim when larger wood
5 is left onsite at the customer’s premise. With T&E pricing, rates to mitigate and trim larger trees
6 can be several thousand dollars, particularly when all wood is removed from the site. SDG&E
7 field personnel may only perform limited vegetation management activities if they are simple in
8 nature and can be done at the time of identification.

9 Where prudent and achievable, SDG&E prunes trees throughout its service territory to a
10 12-foot (or more) clearance, to remain compliant with all regulatory and internal minimum
11 requirements. The post pruning clearances obtained by the tree contractor are determined by
12 factors such as species, tree growth, wind sway, and proper pruning practices. Fast growing
13 species may require post-pruning clearances of at least 16-20 feet to remain compliant with
14 minimum requirements for the annual cycle.

15 Within the HFTD, SDG&E performs routine and non-routine hazard tree inspections
16 annually. These inspections are performed by International Society of Arboriculture Certified
17 Arborists and include a 360-degree assessment of every tree within the “strike zone” of the
18 conductors. The “strike zone” includes the area adjacent to powerlines both inside and outside of
19 the rights-of-way for trees that are tall enough to potentially strike the overhead facilities. As
20 addressed below, to achieve desired wildfire mitigation, SDG&E now aims to prune identified
21 tree species to a 25-foot clearance within the HFTD. The new clearance is a substantial increase
22 from previously implemented practices. On average, SDG&E prunes approximately 175,000
23 trees each year and removes approximately 8,500 non-compatible trees.

1 **B. Quality Assurance**

2 SDG&E has a quality control program to verify that all tree trimming is completed in
3 accordance with applicable laws, regulations, and the scope of work. Throughout the service
4 territory, an automated random sampling method is used to create audit work packages, and then
5 the auditor field reviews records for adherence to contract specifications, quality and compliance.
6 In conjunction with the post-prune audit, auditing activity includes a patrol of all spans of
7 overhead power lines for any trees that may have encroached the minimum clearance zones since
8 the last pre-inspection activity. This activity provides a higher level of compliance for the
9 duration of the annual cycle. In 2019, as an enhanced wildfire mitigation measure, and to verify
10 compliance in all areas of the HFTD, SDG&E performed 100% audit and patrol in the HFTD
11 areas.

12 SDG&E’s vegetation management activities have greatly reduced tree-caused outages
13 over the years. In the early 1990’s, prior to industry regulation, SDG&E encountered an average
14 of 400-500 tree caused outages annually. After establishing the Program, SDG&E experienced a
15 dramatic reduction in tree-related outages. SDG&E conducts a thorough investigation of all tree-
16 related outages and maintains an investigation database to track and record the events. The
17 information aids in preventing future occurrences and further refining the Program.

18 **III. SDG&E’S 2019 VEGETATION MANAGEMENT EXPENDITURES**

19 The 2019 GRC Decision granted SDG&E modification from a one-way to a two-way
20 balancing account for the TTBA, to account for unpredictable vegetation management costs in
21 response to weather and other conditions, enable SDG&E to respond to and mitigate wildfire

1 risk, and allow SDG&E to return excess funds not utilized to ratepayers.³ The 2019 GRC
2 Decision based the 2019 revenue requirement on a four-year average of historical tree-trimming
3 costs.⁴ The 2019 GRC Decision also required SDG&E to file a Tier 3 advice letter for recovery
4 of undercollections of tree trimming costs up to 35 percent, and to file an application for
5 undercollections in excess of 35% of the authorized revenue requirement.⁵ SDG&E's 2019
6 TTBA year-end balance recorded a \$10.4 million undercollection, which is more than 35% of the
7 authorized revenue requirement.⁶ Several cost drivers contributed to the undercollection, as
8 addressed below.

9 **A. Enhanced Vegetation Management**

10 In its 2019 Wildfire Mitigation Plan, SDG&E proposed enhancements to its current
11 vegetation practices related to inspections, patrols, and trimming in the HFTD. Specifically,
12 during the annually scheduled routine inspections, SDG&E increased the pre-inspection scope to
13 include all trees within the strike zone of transmission and distribution electric facilities.
14 Accordingly, in 2019 SDG&E assessed all trees tall enough to strike overhead lines for
15 hazardous conditions and reduced or removed trees to prevent line strikes from tree failure or
16 limb break outs. SDG&E also expanded mid-cycle patrols and inspection of vegetation in its
17 service area.

³ D.19-09-051 at 266-267 (“Costs were forecast using a four-year average because costs in 2012 were unusually high.”).

⁴ Costs between 2013-2016 formed the basis for the average.

⁵ D.19-09-051, Ordering Paragraph 8.b. at 778.

⁶ See prepared direct testimony of Claire Olegario for additional detail on the TTBA undercollection calculation.

1 Enhancements to the Vegetation Management Program included substantial expansion of
2 the post-prune clearances for trees in the SDG&E service territory. In the HFTD, the tree-trim
3 scope was also increased to achieve a 25-foot clearance post-prune, where feasible, between
4 trees and electric facilities. The 25-foot clearance expanded beyond legal and regulatory
5 requirements and particularly targeted high-risk, fast-growth species in the HFTD, such as
6 eucalyptus, pine, oak and sycamore. Both trees that could grow within the 25-foot clearance of
7 the power line or, alternatively, blow into the clearance area, were coded for trimming where
8 feasible. These expanded reliability trim clearances resulted in additional costs. On average,
9 between 2018 and 2019, costs increased an average of approximately \$64 per reliability tree
10 trim.

11 **B. Hazard Tree Removal**

12 The primary driver of the TTBA cost increases is associated with the removal of hazard
13 trees—trees tall enough to strike overhead electric lines in the event of a whole tree failure or
14 limb break. Historically, the vast majority of tree-related outages and ignitions involving
15 tree/line contact were the result of trees that dropped branches or failed onto power lines.
16 Hazard tree evaluation is a critical component of SDG&E’s Vegetation Management Program
17 operations in efforts to reduce tree-related outages and avoid fire ignitions. SDG&E utilizes
18 International Society of Arboriculture certified arborists to perform its hazard tree inspections.
19 These individuals also receive annual hazard tree inspection training to stay current with best
20 practices. SDG&E actively pursues the removal of non-compatible tree species with known
21 tendencies for branch or trunk failure, and trees that are dead, dying, or structurally defective.

22 In 2019, SDG&E inspectors performed enhanced hazard tree reviews with a particular
23 focus in the HFTD. Inspection activities included a review of hazard trees that presented a
24 reasonable and likely potential to strike power lines as a result of failure. Any tree that could

1 strike a line from a fall at ground level was inspected, with a specific focus on certain fast-
2 growth and high-risk tree species as identified in SDG&E's Vegetation Risk Index. SDG&E
3 also initiated off-cycle, additional patrols of high-risk species to remediate issues before they
4 became a danger. As a result of the enhanced hazard tree assessments, SDG&E identified,
5 removed, or trimmed a significantly larger number of hazard and reliability trees in 2019. In
6 2019, SDG&E identified and remediated approximately 9,538 hazard trees, compared to 5,512
7 trees identified in 2015.

8 Hazard tree removal and trimming presents substantial additional costs, many of which
9 are dependent upon the tree and remediation efforts involved. Costs can start at hundreds of
10 dollars, but typical tree removal costs in the tens of thousands. Removal of trees identified as
11 reliability or hazard trees is usually performed at T&E rates. Generally, tree removal involves a
12 flat removal fee to the contractor, in addition to hourly costs for labor. Large trees can take days
13 to remove and involve expensive specialized heavy equipment for worker safety and efficiencies.
14 Due to the size of most hazard trees, removal and trimming work can include the use of cranes,
15 100/125 aerial lifts for larger crews, whole tree chippers, prentice loaders, loaders, and transport
16 of roll-off bins. The additional equipment requires specialized crews and transportation as well.
17 Additionally, depending on the size or location of the tree, SDG&E contractors must implement
18 protocols to ensure the safety of both contractors and the public. In the HFTD—where the
19 majority of hazard tree work is completed—SDG&E requires third party fire suppression
20 resources on site for emergency and hazard tree work. After the tree is removed, SDG&E must
21 also remove debris and arrange for recycling or composting of wood. As such, costs can range as
22 high as \$30,000 for one tree removal.

1 For one of SDG&E's major contractors, routine tree trim rates for hazard or reliability
2 tree removal/trim increased 11% between 2018 and 2019. That percentage increase excludes
3 costs for lodging, overtime, and outsourced labor, as addressed below. These cost increases,
4 coupled with the larger number of hazard trees removed, resulted in a substantial portion of the
5 increased TTBA spending.

6 SDG&E also focused efforts on an aggressive hazard tree removal program and
7 campaign educating customers regarding "Right Tree-Right Place." This program encourages
8 sustainable tree removal and replacement, with the goal of modifying urban and rural forest areas
9 and reducing customer impact as a result of frequent tree-trimming visits. SDG&E offers free
10 tree replacements when an existing tree cannot be maintained safely near powerlines and should
11 be removed rather than trimmed.

12 As a result of the expanded post-prune clearance and enhanced vegetation management
13 plan, SDG&E has faced additional expenditures related to customer education as well as
14 customer refusal resolution efforts. Currently, there are approximately 1000 customer refusals in
15 the HFTD, resulting in increased costs to achieve resolution and compliance with SDG&E's
16 vegetation management programs.

17 Additionally, enhanced vegetation management programs have resulted in increased
18 biomass and recycling costs. Tree removal operations in sensitive environmental areas must be
19 reviewed in advance to determine protocols to protect species and habitats. With customer
20 consent, SDG&E will leave wood behind after tree removal, but only large pieces in excess of 6-
21 8 inches in diameter. Remaining wood is placed in a way to prevent erosion and maintain soil
22 integrity. In some instances, customers also request removal of all tree debris, which results in
23 additional chipping and recycling costs. SDG&E is working closely with composting and

1 recycling vendors to reduce its landfill footprint and the overall carbon footprint of tree
2 removals. SDG&E supports woodworking vendors through the lumber cycle, including Palomar
3 College, and has retained a vendor, Corona Enterprises, to address sustainability, tree salvage,
4 and wood working issues. SDG&E continues to work to find additional composting vendors to
5 reduce landfill use.

6 **C. Enhanced Audit**

7 Upon completion of the tree pruning and removal activity, a certified arborist performs a
8 quality assurance audit, typically on a random representative sample of the completed work, to
9 ensure compliance with the scoping requirements. During the audit, the certified arborist also
10 performs a cursory inspection of the powerlines within the Vegetation Management Area for any
11 trees that will not remain in compliance with applicable requirements until the next trim cycle.
12 The results are then reviewed with SDG&E and the contractor to determine if any additional
13 work is required. For 2019, SDG&E also enacted a complete line patrol during the audit and
14 100% audit of all hazard and reliability tree work in the HFTD to ensure compliance with all
15 vegetation management requirements. The estimated additional costs of these Off-Cycle Level 2
16 inspections in conjunction with Post-Trim Audits over 2019 were approximately \$197,000. In
17 addition to substantial increases in labor costs, the enhanced audit resulted in the trimming
18 and/or removal of an additional 417 trees, of which 227 were hazard or reliability trees.

19 **D. Labor and Equipment**

20 The implementation of the California utilities' Wildfire Mitigation Plans and increased
21 efforts at wildfire mitigation statewide has resulted in generally increased labor costs related to
22 vegetation management. All major California utilities are simultaneously implementing
23 enhanced vegetation management practices to mitigate fire risk, resulting in substantial increases
24 in demand for certified arborists and vegetation management labor. Due to labor constraints,

1 SDG&E has had to retain, train and ramp-up outside tree crews from other states to support the
2 increased workload in the HFTD. In order for these outsourced crews to work in the field, they
3 must be trained on SDG&E customer engagement protocols, notifications, refusal forms, fire
4 tools necessary to safely perform work, understanding of clearances necessary at time of trim
5 and/or removal, navigation, and use of SDG&E IT hardware and software. Currently SDG&E is
6 averaging 117 tree crews on property, an increase from the historical average of 80 crews. On
7 average, the cost of these outsourced crews, including per-diems, lodging, and overtime is
8 approximately \$60,000 per week. For one of SDG&E's major contractors, the increase in
9 overtime pay—at time and a half rates—over 2018 was approximately \$242,000. SDG&E
10 anticipates that these increased costs will continue and/or escalate as utilities across California
11 address vegetation management programs statewide.

12 For 2019, SDG&E also implemented two new safety positions, the general foreman for
13 safety and the on-site safety representative. While these positions are necessary for continued
14 job safety for vegetation management personnel, they also create cost increases over previous
15 years. The general foreman is paid \$41 hourly and the safety representative receives \$42 per
16 hour.

17 Exigent conditions also constrain vegetation management work and have resulted in cost
18 increases. Except in cases of emergency, all vegetation management work is stopped during Red
19 Flag Warning events. During elevated or extreme weather events that could lead to a designated
20 Red Flag Warning, SDG&E vegetation management contractors are kept informed of the
21 conditions, allowing them time to relocate crews into safe work areas. In instances of emergency
22 tree pruning during extreme fire conditions, additional fire equipment and/or professional fire
23 services are required to assist tree crews, resulting in additional cost. Additionally, SDG&E

1 must prepare and stage tree trimming crews during winter storms for emergency response.
2 During these emergency events, routine tree work is put on hold to attend to immediate needs in
3 SDG&E's service territory. This work must be made up with crews working overtime, with
4 associated costs, to maintain the routine work schedule throughout the service area.

5 **E. Cost Management**

6 SDG&E prioritizes cost-effectiveness and prudent cost management in its tree-trimming
7 and vegetation management activities. As with any work, customer and employee safety are
8 paramount. SDG&E has long-term contracts with reputable tree trimming companies, with
9 whom the company has long-standing relationships. The contracts are competitively negotiated
10 and based on available information. Accordingly, SDG&E believes that its vegetation
11 management contracts are competitive both for per-unit work as well as hourly rates. SDG&E
12 audits every contractor for compliance with negotiated scopes of work. In addition, vegetation
13 management contracts are vetted through internal supply management to evaluate cost-
14 effectiveness. As described in the prepared direct testimony of Ms. Olegario, SDG&E's ongoing
15 prudence in cost management and cost effectiveness has resulted in a history TTBA
16 overcollections over the past several years. These overcollections were returned to ratepayers.

17 The Vegetation Management Program is also routinely audited by its corporate parent,
18 Sempra Energy. Sempra Energy evaluates SDG&E's Vegetation Management Program
19 specifically to verify that the activities are performed in compliance with regulations and
20 SDG&E requirements. These audits make recommendations for improvement on all aspects of
21 the Vegetation Management Program to management when improvement is possible, and
22 monitors compliance with approved changes.

1 **IV. CONCLUSION**

2 In compliance with D.19-09-051, which requires SDG&E to request cost recovery
3 through an Application for TTBA undercollections above 35% of the revenue requirement,
4 SDG&E respectfully requests that the Commission authorize recovery of the 2019
5 undercollected TTBA balance.

1 **V. WITNESS QUALIFICATIONS**

2 My name is Don Akau. I am the Vegetation and Pole Integrity Manager at San Diego Gas
3 and Electric Company (“SDG&E”). I am responsible for developing, implementing and
4 managing SDG&E’s Vegetation Management Program, overseeing pre-inspection, tree
5 trimming, pole brushing, wood pole inspection and quality assurance (audits), to ensure
6 compliance with the various responsible regulatory agencies, SDG&E internal requirements, and
7 applicable law. I have held this position since May 2007.

8 I have been a Certified Arborist and Utility Specialist since 1995. I joined SDG&E’s
9 Vegetation Management department in 1999 as a Forester, and then I became Vegetation
10 Program Manager since 2007. Prior to joining SDG&E, I was employed by Davey Tree for
11 approximately 10 years, and my last position there was as general foreman.

12 I have previously prepared testimony submitted to the California Public Utilities
13 Commission.

Exhibit 02

SDG&E Prepared Direct Testimony of Claire F. Olegario in support
of Application, dated July 1, 2020

Company: San Diego Gas & Electric Company (U 902-E)
Proceeding: 2019 Tree Trimming Balancing Account
Application: A.20-07-____
Exhibit: SDG&E-02

SAN DIEGO GAS & ELECTRIC COMPANY
PREPARED DIRECT TESTIMONY OF
CLAIRE F. OLEGARIO

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



July 1, 2020

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ATTACHMENT A – TTBA BALANCES - ELECTRIC

1 **PREPARED DIRECT TESTIMONY OF CLAIRE F. OLEGARIO**
2 **ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY**

3
4 **I. INTRODUCTION**

5 The purpose of my testimony is to present San Diego Gas & Electric Company’s
6 (“SDG&E”) 2019 undercollection as currently recorded in its Tree Trimming Balancing Account
7 (“TTBA”) and, in accordance with the applicable statutory and regulatory directives indicated
8 below, to request recovery of the undercollection recorded in its TTBA. My testimony is
9 organized as follows:

- 10 • In Section II, I discuss the background of the recovery mechanism generally, as
11 well as its applicability to SDG&E’s TTBA balance.
- 12 • In Section III, I discuss SDG&E’s recorded December 31, 2019 TTBA
13 undercollected balance of \$10.4 million, which is above the 35% threshold,
14 requiring an application to request recovery of the undercollection. I also generally
15 address the cause of that undercollection.
- 16 • In Section IV, I discuss rate recovery and propose that the amortization of the
17 undercollected TTBA balance to be amortized over 12 months with SDG&E’s
18 Electric Rate Consolidated submission on January 1 of the year following approval
19 of this Application, concluding December 31.
- 20 • In Section V, I conclude my testimony.
- 21 • In Section VI, I provide my witness qualifications.

22 **II. BACKGROUND**

23 **Recovery Mechanism and Threshold Amounts**

24 Decision (“D.”) 19-09-051 (“2019 GRC Decision”), SDG&E’s Test Year (“TY”) 2019
25 General Rate Case (“GRC”), authorized the modification of the TTBA from a one-way to a two-

1 way balancing account effective January 1, 2019. The 2019 GRC Decision requires SDG&E to
2 file a Tier 3 Advice Letter for cost recovery of undercollections up to 35% of the revenue
3 requirement, and an Application for undercollections above 35% of the revenue requirement.¹
4 For 2019, the authorized revenue requirement was approximately \$24.2 million. As presented in
5 Table 1, the ending undercollected balance as of December 31, 2019 for the TTBA was
6 approximately \$10.4 million, which is approximately 43% of the revenue requirement.
7 Accordingly, SDG&E is submitting this Application for cost recovery.

8 **III. RECORDED TTBA BALANCES**

9 Table 1 below shows SDG&E's recorded data for January through December 2019.
10 Authorized TTBA revenues are approved in SDG&E's GRC. These authorized revenues are
11 recorded in the TTBA and straight-lined over 12 months. Due to the delay of the approval and
12 implementation of SDG&E's 2019 GRC Decision, the authorized revenues for January 2019 –
13 August 2019 were recorded at the authorized levels for Attrition Year ("AY") 2018, approved in
14 SDG&E's TY2016 GRC.² SDG&E received approval of the 2019 GRC Decision in September
15 2019 and began recording the authorized revenues approved in the 2019 GRC Decision in
16 September 2019. At that time, SDG&E also recorded a true-up of the authorized revenues for
17 the periods January 2019 – August 2019, which nets to a negligible authorized revenue for the
18 month of September 2019.

19 The amortization of the balance is approved in SDG&E's Annual Regulatory Electric
20 Account Update filings. The amortization is recorded in the TTBA and straight-lined over 12
21 months. At the time of filing SDG&E's Annual Regulatory Electric Account Update for rates

¹ D.19-09-051, Ordering Paragraph 8.b. at 778.

² D.16-06-054.

1 effective January 1, 2019, SDG&E forecasted the TTBA 2018 ending balance to be an
 2 overcollection of \$3.2 million.³ This amount was amortized and returned to ratepayers in rates in
 3 2019. The actual 2018 ending balance was an overcollection of \$2.6 million.

4 **TABLE 1: TTBA BALANCES⁴**

(\$ in Millions)					
TTBA Monthly Summary	Beginning Balance	Authorized Revenues	Amortization	Expenses	Ending Balance Under/ (Over) Collection
January 31, 2019	\$(2.6)	\$(2.3)	\$0.3	\$1.0	\$(3.6)
February 28, 2019	\$(3.6)	\$(2.2)	\$0.2	\$1.5	\$(4.1)
March 31, 2019	\$(4.1)	\$(2.3)	\$0.3	\$3.2	\$(2.9)
April 30, 2019	\$(2.9)	\$(2.3)	\$0.3	\$3.3	\$(1.6)
May 31, 2019	\$(1.6)	\$(2.3)	\$0.2	\$3.0	\$(0.7)
June 30, 2019	\$(0.7)	\$(2.3)	\$0.3	\$3.9	\$1.2
July 31, 2019	\$1.2	\$(2.2)	\$0.3	\$1.9	\$1.2
August 31, 2019	\$1.2	\$(2.3)	\$0.3	\$1.5	\$0.7
September 30, 2019	\$0.7	\$(0.0)	\$0.2	\$5.5	\$6.4
October 31, 2019	\$6.4	\$(2.0)	\$0.3	\$0.6	\$5.3
November 30, 2019	\$5.3	\$(2.0)	\$0.3	\$1.9	\$5.5
December 31, 2019	\$5.5	\$(2.0)	\$0.2	\$6.7	\$10.4

5
 6 **Causes of the Current Undercollection**

7 SDG&E's TTBA is comprised of revenues and expenses associated with tree trimming
 8 necessary to comply with all federal and state regulations as well as internal SDG&E standards,
 9 less revenues/expenses for brush management approved in the 2019 GRC Decision. Tree

³ Amortization of the 2018 forecasted overcollected ending balance was approved in Advice Letter ("AL") 3291-E, SDG&E's Annual Electric Regulatory Account Update for Rates Effective January 1, 2019, approved on December 17, 2018.

⁴ Figures can also be found in Attachment A.

1 trimming costs primarily include expenses for crews, equipment, tree removals, mulching and
 2 information systems support, among others, as further described in the prepared direct testimony
 3 of Mr. Don Akau (“SDG&E-1”). When the account is either overcollected or undercollected for
 4 an accounting period, several factors contribute to the ending position. As further addressed by
 5 Mr. Akau, SDG&E’s analysis reveals that the main factor in the 2019 undercollection is the
 6 increase in costs due to enhanced vegetation management practices, including removal of more
 7 hazardous trees; enhanced audits in the High Fire Threat Districts, resulting in additional
 8 workloads and tree removal; and increased labor costs and specialized equipment to help
 9 mitigate the increased volume of tree trim work.

10 As shown in Table 2 below, prior to SDG&E’s implementation of enhanced vegetation
 11 management practices and additional circumstances outside of SDG&E’s control in 2019, such
 12 as labor market changes, SDG&E has typically carried overcollected balances and refunded
 13 unspent funds back to the ratepayers. These overcollections are due in part to SDG&E’s
 14 prioritization of cost-effectiveness and prudent cost management in its tree-trimming and
 15 vegetation management activities. In 2019, despite SDG&E’s continued cost management of
 16 TTBA expenses, contracts, and labor costs, the expansion of tree trimming and increased costs as
 17 described in Mr. Akau’s testimony has driven the undercollection for 2019.

18 **TABLE 2: TTBA BALANCES PRIOR TO 2019**

(\$ in Millions)	
Year End	Ending Balance Under/(Over) Collection
2012	\$6.1
2013	\$(6.8)
2014	\$(13.1)

2015	\$(9.2)
2016	\$(5.5)
2017	\$(5.3)
2018	\$(2.6)

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IV. RATE RECOVERY AND AMORTIZATION PERIOD

As noted above and depicted in Table 1, SDG&E’s undercollected balance is \$10.4 million as of December 31, 2019. SDG&E proposes to amortize in rates the December 31, 2019 undercollection of \$10.4 million over 12 months, with SDG&E’s annual electric rate consolidated advice letter submission on January 1 of the year following approval of this application, concluding December 31.

Assuming this amortization, the average bill for a typical bundled residential customer living in the inland climate zone and using 400 kilowatt-hours would reflect an increase of 0.3%, or \$0.29 (from \$111.69 to \$111.98).

V. CONCLUSION

In compliance with D.19-09-051, which requires SDG&E to request cost recovery through an application for TTBA undercollections above 35% of the revenue requirement, SDG&E:

- requests that the Commission authorize the cost recovery of the undercollected two-way TTBA balance of \$10.4 million as of December 31, 2019; and
- proposes to amortize the balance in rates over 12 months with SDG&E’s Electric Rate Consolidated submission on January 1 of the year following approval of this Application, concluding December 31.

This concludes my prepared direct testimony.

1 **VI. WITNESS QUALIFICATIONS**

2 My name is Claire F. Olegario. I am employed by SDG&E as the Regulatory Accounts
3 Supervisor in the Controller’s Division. My business address is 8330 Century Park Court, San
4 Diego, California 92123. My current responsibilities include managing the process for the
5 development, implementation and analysis for regulatory balancing and memorandum accounts.
6 I assumed my current position in August 2019.

7 I received a Bachelor of Science in Accounting in 2007 from San Diego State University.
8 I am a Certified Public Accountant (“CPA”) licensed in the State of California since 2009.

9 I have been employed with SDG&E since 2016. Before assuming my current position in
10 Regulatory Accounts, I served as a Principal Accountant for Utility Accounting at SoCalGas.
11 Prior to joining SDG&E, I worked for a public accounting firm from 2007–2016 and held
12 various positions with increasing responsibility including an Audit - Supervisor.

13 I have not testified before this Commission.

Attachment A

San Diego Gas & Electric
Tree Trimming Balancing Account (TTBA) - Electric
Under / (Over) Collection

2019

Category	Text	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
	Beginning Balance	(2,590,263)	(3,569,986)	(4,086,811)	(2,943,590)	(1,621,985)	(665,368)	1,208,510	1,179,681	697,938	6,404,384	5,293,195	5,480,883	(2,590,263)
Revenues:	TTBA Electric Authorized Revenue	(2,262,667)	(2,262,667)	(2,262,667)	(2,262,667)	(2,262,667)	(2,262,667)	(2,262,667)	(2,262,667)	(2,262,667)	(2,262,667)	(2,262,667)	(2,262,667)	(24,168,000)
	TTBA Electric Amortization	268,500	268,500	268,500	268,500	268,500	268,500	268,500	268,500	268,500	268,500	268,500	268,500	3,222,000
Total Revenues		(1,994,167)	(1,994,167)	(1,994,167)	(1,994,167)	(1,994,167)	(1,994,167)	(1,994,167)	(1,994,167)	(1,994,167)	(1,994,167)	(1,994,167)	(1,994,167)	(20,946,000)
D&M Costs:	TTBA O&M	1,014,444	1,477,342	3,137,389	3,315,772	2,950,784	3,868,045	1,965,338	1,512,424	5,462,610	634,311	1,933,188	6,685,262	33,956,907
Total Costs		1,014,444	1,477,342	3,137,389	3,315,772	2,950,784	3,868,045	1,965,338	1,512,424	5,462,610	634,311	1,933,188	6,685,262	33,956,907
Net Cost / (Revenue)		(979,723)	(516,825)	1,143,222	1,321,605	956,617	1,873,878	(28,829)	(481,743)	5,706,446	(1,111,189)	187,688	4,939,762	13,010,907
Interest	TTBA Interest													-
	Asset/Liab. Bal. Transfer													-
Net Activity		(979,723)	(516,825)	1,143,222	1,321,605	956,617	1,873,878	(28,829)	(481,743)	5,706,446	(1,111,189)	187,688	4,939,762	13,010,907
Ending Balance		(3,569,986)	(4,086,811)	(2,943,590)	(1,621,985)	(665,368)	1,208,510	1,179,681	697,938	6,404,384	5,293,195	5,480,883	10,420,644	10,420,644

Exhibit 03

Cal Advocates Prepared Testimony of Ryan Andresen (Recovery of 2019 Undercollected Balance in the Tree Trimming Balancing Account), dated December 8, 2020

Docket : A.20-07-003
Exhibit Number : CalAdvocates-02
Commissioner : Randolph
ALJ : Lau
Witness : Andresen



PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION

**Report on the Results of Operations
for
San Diego Gas & Electric Company
Recovery of the 2019 Undercollected
Balance Recorded in the Tree Trimming
Balancing Account**

San Francisco, California
December 8, 2020

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1 **2019 Wildfire Mitigation Costs Recorded in**
2 **SDG&E's Tree Trimming Balancing Account**

3 **I. INTRODUCTION**

4 This exhibit presents the analyses and recommendations of the Public
5 Advocates Office at the California Public Utilities Commission (Cal Advocates)
6 regarding San Diego Gas & Electric Company's (SDG&E) 2019 undercollected
7 balance recorded in its Tree Trimming Balancing Account (TTBA) for enhanced
8 wildfire mitigation activities.

9 SDG&E records vegetation management expenses pursuant to its Vegetation
10 Management Program in the TTBA. In 2019, the authorized revenue requirement for
11 the TTBA was approximately \$24.2 million.¹ The decision on SDG&E's 2019 GRC
12 modified the TTBA to a two way balancing account to "enable SDG&E to act more
13 quickly in case further activities to mitigate wildfire risk become necessary and at the
14 same time allow SDG&E to return excess funds not utilized to ratepayers" with an
15 application for recovery of undercollections required when costs exceed 35 percent
16 over the authorized level.² As \$10.4 million is 43% over the authorized revenue
17 requirement, SDG&E submits this application for recovery.³

18 SDG&E's TTBA recovery request includes costs incurred for its expanded
19 vegetation management programs, additional labor for tree trimming crews,
20 increased hazard tree removals, enhanced audits and patrols in High Fire Threat
21 Districts, equipment and information systems support.⁴

¹ Application 20-07-003 at page 1.

² D.19-09-051 at p. 267.

³ SDG&E's 2019 undercollected balance of \$10.4 million includes \$34 million in 2019 expenses, a beginning overcollected balance of \$2.6 million, and amortization of \$3.2 million from the forecasted 2018 overcollected balance.

⁴ SDG&E's Prepared Direct Testimony of Claire F. Olegario in support of Application (Ex. SDG&E-02), p. CFO-4.

1 **II. SUMMARY OF RECOMMENDATIONS**

2 SDG&E proposes cost recovery of \$10.4 million for wildfire mitigation
3 activities incurred in 2019. The requested Operation and Maintenance (O&M) costs
4 are recorded in SDG&E's TTBA.

5 The corresponding Cal Advocates' recommendation for cost recovery of
6 SDG&E's undercollected balance recorded in its TTBA is \$6.3 million. Cal
7 Advocates' recommendation is \$4.1 million lower than SDG&E's request of \$10.4
8 million.

9 The following summarizes the Cal Advocates' recommendations regarding
10 SDG&E's request for recovery of its TTBA undercollected balance:

- 11
- 12 • An adjustment of \$2,948,490 associated with SDG&E's expanded
- 13 clearance program.
- 14
- 15 • An adjustment of \$41,900 associated with SDG&E's customer refusals.
- 16
- 17 • An adjustment of \$979,637 associated with SDG&E's outsourced crews.
- 18
- 19 • An adjustment of \$128,726 associated with SDG&E's administration
- 20 activities.
- 21
- 22 • That the Commission adopt protocols directing SDG&E to include
- 23 workpapers with its future applications that include critical information on
- 24 the costs requested for recovery in its TTBA.
- 25
- 26 • That the Commission adopt protocols directing SDG&E to provide with its
- 27 future applications, specific O&M costs that can be tracked in its
- 28 accounting system and compared to amounts requested for recovery in its
- 29 TTBA.

30 Table 2-1 below shows SDG&E's TTBA undercollected recovery request and
31 Cal Advocates' recommendations.

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Table 2-1
2019 TTBA Undercollected Balance for Wildfire Mitigation Costs
(\$ millions)

Description (a)	SDG&E Proposed (b)	Cal Advocates Recommended (c)	Amount SDG&E>Cal Advocates (d=b-c)	Percentage SDG&E>Cal Advocates (e=d/c)
Tree Trimming Balancing Account	\$10.4	\$6.3	\$4.1	64.8%

4 The following table summarizes Cal Advocates’ recommendations by
5 category.

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Table 2-2
Cal Advocates Adjustments by Category
(In 2019 dollars)

Description (a)	Cal Advocates Adjustment (b)
Expanded Clearance Program	\$2,948,490
Customer Refusals	\$41,900
Outsourced Crews and Exigent Conditions	\$979,637
Admin Expenses	\$128,726
Total	\$4,098,753

9 **III. OVERVIEW OF CAL ADVOCATES’ ANALYSES**

10 Cal Advocates conducted its analysis by reviewing SDG&E’s Testimony and
11 exhibits. Additionally, Cal Advocates issued numerous data requests and analyzed
12 the responses to obtain additional information to clarify its recovery requests. Cal
13 Advocates analyzed the line item detail of 2017-2019 costs recorded in SDG&E’s
14 TTBA and SDG&E’s 2019 Wildfire Mitigation Plan (WMP) to determine which costs
15 were incremental, reasonable, and appropriate for cost recovery.

16 SDG&E did not provide workpapers that discussed the justification for, or the
17 costs associated with, individual O&M costs.⁵ This omission delayed Cal Advocates
18 review and made it difficult to determine the reasonableness of the specific wildfire

⁵ Cal Advocates requested workpapers by email on 07/22/2020 and again on 07/24/2020. In its response on 07/27/2020, SDG&E states, “SDG&E did not prepare workpapers with respect to the TTBA schedule.”

1 mitigation activities include in the TTBA. Cal Advocates recommends that the
2 Commission adopt protocols directing SDG&E to include workpapers with its
3 applications that contain critical information on the costs requested for recovery in
4 the balancing account.

5 Cal Advocates was unable to conduct a more thorough and detailed analysis
6 of various expenses or independently calculate the specific line items that totaled
7 \$10.4 million. SDG&E does not track specific costs or activities attributed to the
8 \$10.4 million undercollection, hindering efforts to identify which costs are
9 incremental.⁶ SDG&E also does not maintain any categorized forecast of 2019
10 TTBA costs to identify which costs were higher than forecasted.⁷ Of the \$10.4
11 million requested, only \$6.2 million is identified as an increase from 2018 costs.⁸ Cal
12 Advocates recommends that the Commission adopt protocols directing SDG&E to
13 provide with its future applications, specific O&M costs that can be tracked in its
14 accounting system and compared to amounts requested for recovery in the
15 balancing account.

16 **IV. DISCUSSION / ANALYSIS OF 2019 WILDFIRE MITIGATION**
17 **EXPENSES**

18 **A. Overview of SDG&E's Request**

19 SDG&E requests a reasonableness review and cost recovery of \$10.4 million
20 for vegetation management expenses recorded in the Tree Trimming Balancing
21 Account deemed to be incremental to routine activities authorized in the 2019 GRC.

⁶ SDG&E's response to data request PubAdv-SDG&E-005-RYD, Q. 1. Cal Advocates requested the cost of each line item in SDG&E's 2019 TTBA that is attributed to the \$10.4 million undercollection. SDG&E's response referenced the spreadsheet of all TTBA costs and replied, "[a]ll line items are attributed to the \$10.4 million undercollection."

⁷ Follow-up question to SDG&E's response to data request PubAdv-SDG&E-005-RYD, by email on October 28, 2020. Cal Advocates questioned, "Referring to the responses to PubAdv-SDG&E-005-RYD, questions 1 and 2b, did SDG&E maintain any categorized forecast of 2019 TTBA costs to see where costs were higher than forecasted?" SDG&E responded, "As to the TTBA forecast, SDG&E does not maintain it by category."

⁸ See Table 2-3, column e.

1 SDG&E does not track or identify which costs are specifically included in the \$10.4
 2 million incremental request and asserts that the entire \$34 million in recorded 2019
 3 TTBA costs are responsible for the undercollection.⁹ Table 2-3 below shows the
 4 breakdown of 2017-2019 TTBA costs provided by SDG&E. Tree trimming comprises
 5 greater than 95% of 2019 TTBA costs. Therefore, Cal Advocates structures its
 6 recommendations by Tree Trimming and by Administrative and Other Employee
 7 Costs. Broken down by category, this amounts to \$32.3 million associated with Tree
 8 Trimming and \$1.7 million associated with Administrative and Other Employee
 9 Costs.

10 **Table 2-3**
 11 **2017-2019 Recorded TTBA Costs**
 12 **(in 2019 Dollars)¹⁰**

Description (a)	2017 (b)	2018 (c)	2019 (d)	Change from 2018 to 2019 (e)
Admin	83,823.93	165,068.21	256,366.45	91,298.24
Cash Discounts	(25,407.02)	(34,398.09)	(57,434.89)	(23,036.80)
Catering	2,823.69	2,935.67	3,176.52	240.85
Consulting	60,060.00	17,001.00	31,390.00	14,389.00
Employee Recognition	15.80	\$0	50.00	50.00
Employee Travel	14,254.29	11,561.31	7,065.08	(4,496.23)
Field Hardware and Software Support	206,691.44	110,596.42	108,209.63	(2,386.79)
Labor	1,087,177.29	1,105,279.58	1,144,274.73	38,995.15
Meals & Entertainment	1,266.34	937.15	1,013.52	76.37
Office Supplies/Office Equipment	11,197.19	14,371.56	8,170.21	(6,201.35)
Tree Trimming	21,590,412.28	26,139,234.07	32,271,592.19	6,132,358.12
Vacation & Sick Overheads	179,043.77	185,175.31	183,034.01	(2,141.30)
Total	23,211,359.00	27,717,762.19	33,956,907.45	6,239,145.26

⁹ SDG&E's response to data request PubAdv-SDG&E-005-RYD, Q. 1 and Q. 2b.

¹⁰ SDG&E's response to data request PubAdv-SDG&E-001-RYD, Q. 1. Costs breakdowns are provided in the spreadsheet, "2017 – 2019 TTBA O&M by categoryDR1Q1 - Supplemental.xlsx."

1 The corresponding Cal Advocates' recommendation for SDG&E's incremental
2 wildfire costs in SDG&E's TTBA is \$6.3 million. Cal Advocates' recommendation is
3 \$4.1 million less than SDG&E's request of \$10.4 million.

4 **B. Tree Trimming Activities**

5 SDG&E recorded \$32,271,592 in Tree Trimming activities in 2019, an
6 increase of approximately \$6.13 million from 2018 and \$10.68 million from 2017.¹¹
7 Tree Trimming costs increased due to alleged enhanced vegetation management
8 practices. SDG&E outlines Tree Trimming activities that are drivers of the
9 undercollection in its application and testimonies, including an expanded tree
10 trimming clearance program, routine and reliability trims, inspections, tree removals,
11 customer refusals, increased biomass and recycling costs, "Level 2" line patrols,
12 outsourced crews, exigent conditions, and the use of specialized equipment.¹²

13 Cal Advocates proposed adjustment for SDG&E's incremental tree trimming
14 costs is \$3,970,027. Cal Advocates analyzed and conducted discovery on each of
15 the tree trimming drivers. Table 2-4 below shows SDG&E's recorded Tree Trimming
16 costs and Cal Advocates' recommendations.

¹¹ See Table 2-3 above.

¹² Drivers are listed in SDG&E's Prepared Direct Testimony of Don Akau in support of Application (Ex. SDG&E-01), pp. DA-6 – DA-13.

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Table 2-4
SDG&E Recorded Tree Trimming Costs, Cal Advocates Recommendation
(In 2019 Dollars)

Description (a)	SDG&E 2019 Recorded Costs (b)	SDG&E 2018 Recorded Costs (c)	SDG&E Incremental Increase from 2018 (d=b-c)	Cal Advocates Adjustment (e)
Expanded Clearance Program ¹³	\$2,948,490	\$0	\$2,948,490	\$2,948,490
Customer Refusals ¹⁴	\$276,500	\$234,600	\$41,900	\$41,900
Outsourced Crews and Exigent Conditions ¹⁵	\$979,637	\$0	\$979,637	\$979,637
Total	\$4,204,627	\$234,600	\$3,970,027	\$3,970,027

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1. Expanded Clearance Program

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SDG&E began an Expanded Clearance Program in 2019 to increase the tree trim scope “to achieve a 25 feet clearance post-trim within the HFTD where feasible between trees and electric facilities.”¹⁶ SDG&E recorded \$2,948,490 in tree trimming costs from this program and trimmed a total of 15,154 routine and reliability trees.¹⁷ The expanded post-trim clearance to 25 feet is more than double the previous standard of 12 feet.¹⁸ SDG&E asserts that “[t]he new clearance is a

¹³ SDG&E’s response to data request PubAdv-SDG&E-001-RYD, Q. 2a.

¹⁴ SDG&E’s response to data request PubAdv-SDG&E-004-RYD, Q. 6c.

¹⁵ SDG&E’s response to data request PubAdv-SDG&E-001-RYD, Q. 12 and Q. 9. SDG&E utilized outsourced crews for 14 weeks with a total lodging and per diem cost of \$150,538.49. According to PubAdv-SDG&E-001-RYD, question 9, the average weekly labor cost for outsourced crews was \$59,221.30. $\$59,221.30 \times 14 + \$150,538.49 = \$979,636.69$.

¹⁶ SDG&E’s 2019 Wildfire Mitigation Plan (WMP) at p. 43.

¹⁷ SDG&E’s response to data request PubAdv-SDG&E-003-RYD, Q. 1g.

¹⁸ SDG&E’s 2019 Wildfire Mitigation Plan (WMP) at p. 43.

1 substantial increase from previously implemented practices” and cites its 2019
2 Wildfire Mitigation Plan as authorization of the expanded clearances.¹⁹

3 Cal Advocates recommends an adjustment of \$2,948,490 to remove costs
4 recorded in SDG&E’s TTBA incurred for expanded clearance activities. The
5 decision on SDG&E’s 2019 WMP states that SDG&E may only implement the
6 program “if such a practice is supported by scientific evidence or other data showing
7 that such clearance will reduce risk under wildfire conditions.”²⁰ In addressing
8 SDG&E’s 2020 WMP, Commission Resolution WSD-005 concluded that this
9 requirement was not met:

10 SDG&E does not detail proposed guidelines for where such a
11 clearance is both feasible and necessary, or scientific evidence or
12 other data showing that such clearance will reduce wildfire risk, as
13 directed in our decision approving SDG&E’s 2019 WMP.²¹

14 Cal Advocates propounded significant discovery to identify the scientific
15 evidence or data required in its 2019 WMP decision. SDG&E’s responses did not
16 include any evidence or data demonstrating that an expanded 25-foot clearance
17 from distribution facilities reduces wildfire risk. Instead, SDG&E provided historical
18 data to show the impact of expanding clearances to 18-inches in 1996 and to 10-feet
19 in 1999, as well as data on expanded clearances in the transmission system where
20 a 25-foot clearance is already maintained.²² SDG&E’s 3rd Quarterly Report on its
21 2020 WMP provided similar historical data that fails to identify the impact of
22 expanded clearances in the distribution system.²³

23 SDG&E’s history of expanded clearances and vegetation contacts further
24 question the reasonableness of this program and whether the costs are incremental.

¹⁹ SDG&E’s response to data request PubAdv-SDG&E-003-RYD, Q. 3a and SDG&E’s Prepared Direct Testimony of Don Akau in support of Application (Ex. SDG&E-01), p. DA-5, lines 21-22.

²⁰ Decision 19-05-039 at p. 29-30, ordering paragraph 5.

²¹ Resolution WSD-005 at p. 38.

²² SDG&E’s response to data request PubAdv-SDG&E-003-RYD, Q. 1i.

²³ SDG&E’s Quarterly Report on 2020 Wildfire Mitigation Plan for Q3 2020, p. 125-129.

1 The following table shows the number of trees trimmed to an expanded clearance
 2 and the number of vegetation contacts each year.

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**Table 2-5
 Expanded Clearances and Vegetation Contacts**

Year (a)	Trees Trimmed to a 20-30' Clearance ²⁴ (b)	Change in Number of Trees Trimmed from Previous Year (%) (c)	Number of Vegetation Contacts ²⁵ (d)	Change in Number of Vegetation Contacts from Previous Year (%) (e)
2010	3,380	18.8%	130	62.5%
2011	2,313	-31.6%	29	-77.7%
2012	1,947	-15.8%	39	34.5%
2013	2,186	12.3%	29	-25.6%
2014	4,024	84.1%	52	79.3%
2015	5,181	28.8%	32	-62.5%
2016	7,784	50.2%	52	62.5%
2017	6,064	-22.1%	39	-25.0%
2018	8,010	32.1%	27	-30.8%
2019	10,463	30.6%	50	85.2%

5 Table 2-5 shows that SDG&E has already been trimming trees to an
 6 expanded clearance in the distribution system before the program began in 2019.
 7 Figure 2-1 below plots the number of vegetation contacts each year. In 2019, the
 8 first year of the program, vegetation contacts increased relative to 2017 and 2018.²⁶

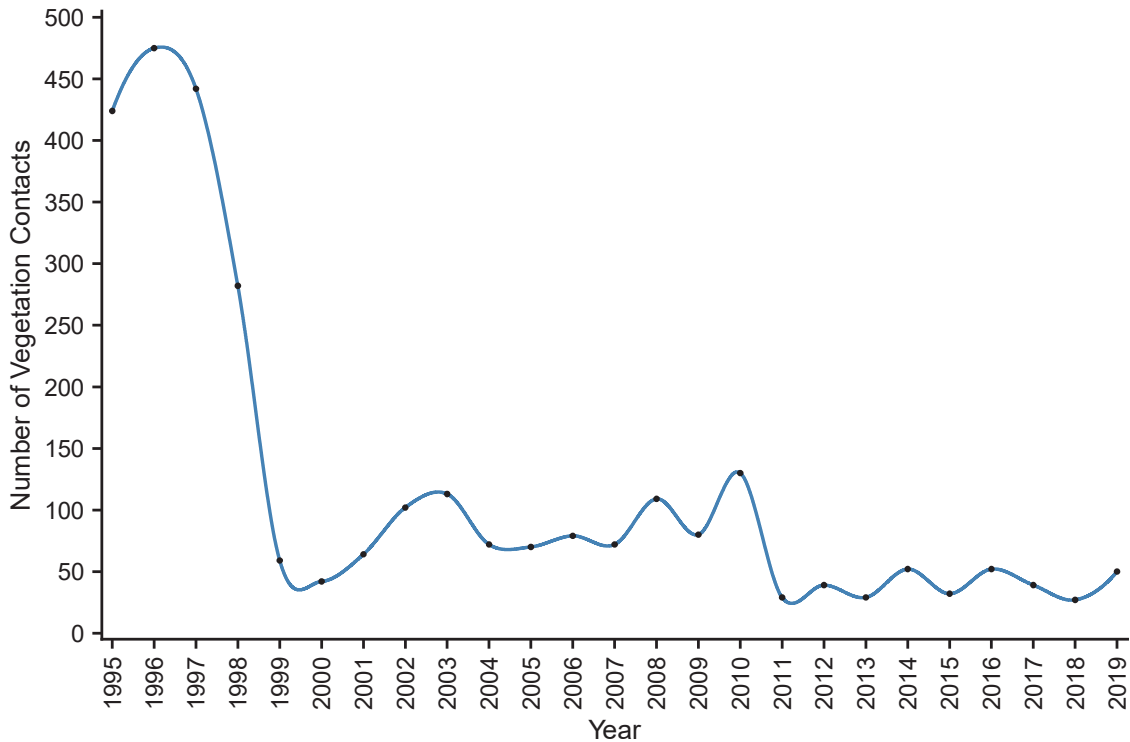
²⁴ SDG&E's follow-up response to data request PubAdv-SDG&E-003-RYD, Q. 1. These are the number of trees that were trimmed to a 20'-30' clearance in the distribution system.

²⁵ SDG&E's follow-up response to data request PubAdv-SDG&E-003-RYD, Q. 3 provides the number of vegetation contacts from all trees within SDG&E's service territory.

²⁶ Table 2-5. The number of vegetation contacts were 39 in 2017, 27 in 2018, and 50 in 2019.

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Figure 2-1
Expanded Clearances and Vegetation Contacts²⁷



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2. Customer Refusals

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SDG&E estimates that 826 Customer Refusals resulted in \$276,500 in 2019 costs, an increase of \$41,900 from 2018.²⁸ SDG&E asserts that it incurred additional expenditures on Customer Refusals due to the expanded clearance program and enhanced vegetation management activities.²⁹ SDG&E does not track or record costs associated with Customer Refusals or provide calculations for its estimates.³⁰

Cal Advocates recommends an adjustment of \$41,900 to remove costs incurred for Customer Refusals. The increase in the number of Customer Refusals

²⁷ SDG&E's follow-up response to data request PubAdv-SDG&E-003-RYD, Q. 3.

²⁸ SDG&E's response to data request PubAdv-SDG&E-005-RYD, Q. 2b.

²⁹ SDG&E's Prepared Direct Testimony of Don Akau in support of Application (Ex. SDG&E-01), p. DA-10, lines 12-16.

³⁰ SDG&E's response to data request PubAdv-SDG&E-004-RYD, Q. 6b.

1 resulted, in part, from the Expanded Clearance Program that was not authorized by
2 SDG&E's 2019 WMP. SDG&E's estimates of the costs associated with Customer
3 Refusals have varied across its responses to data requests and SDG&E does not
4 provide calculations for any of the estimates.³¹ The increase in customer refusals in
5 2019 may have even presented a cost saving when work was not completed and
6 billed.³²

7 **3. Outsourced Crews and Exigent Conditions**

8 SDG&E recorded \$979,636.69 in the TTBA for outsourced crews in 2019.³³
9 SDG&E did not utilize outsourced crews prior to 2019.³⁴ Outsourced crews were
10 utilized "to support the increased workload in the HFTD" and due to delays caused
11 by exigent conditions.³⁵ Exigent conditions refer to days with extreme fire danger
12 such as Red Flag Warning days and days where SDG&E's Fire Potential Index (FPI)
13 is rated as extreme.³⁶ SDG&E did not provide an amount of increased TTBA costs
14 resulting from exigent conditions and instead point to the cost of outsourced crews
15 as illustrative of the total amount spent.³⁷ In 2019, SDG&E experienced the same
16 number of Red Flag Warning days as 2018 and 50% less Red Flag Warning days

³¹ In SDG&E's response to data request PubAdv-SDG&E-004-RYD, Q. 6c, SDG&E estimates \$276,500 in 2019 Customer Refusals. In SDG&E's response to data request PubAdv-SDG&E-005-RYD, Q. 2b, SDG&E's estimate is \$247,800. In SDG&E's response to data request PubAdv-SDG&E-001-RYD, Q. 4d, Cal Advocates requested calculations, which were not provided, and SDG&E insisted that it "does not track and record specific costs, or the costs associated with specific customer refusals."

³² SDG&E's response to data request PubAdv-SDG&E-001-RYD, Q. 4c.

³³ SDG&E's response to data request PubAdv-SDG&E-001-RYD, Q. 12 and Q. 9. SDG&E utilized outsourced crews for 14 weeks with a total lodging and per diem cost of \$150,538.49. According to PubAdv-SDG&E-001-RYD, question 9, the average weekly labor cost for outsourced crews was \$59,221.30. $\$59,221.30 \times 14 + \$150,538.49 = \$979,636.69$.

³⁴ SDG&E's supplemental response to data request PubAdv-SDG&E-001-RYD, Q. 9 and Q. 12.

³⁵ SDG&E's Prepared Direct Testimony of Don Akau in support of Application (Ex. SDG&E-01), p. DA-12, lines 1-2 and SDG&E's response to data request PubAdv-SDG&E-004-RYD, Q. 11.

³⁶ SDG&E's supplemental response to data request PubAdv-SDG&E-001-RYD, Q. 11.

³⁷ SDG&E's response to data request PubAdv-SDG&E-004-RYD, Q. 11.

1 than 2017. SDG&E also experienced fewer FPI days in 2019 than in 2017 or in
2 2018.³⁸

3 SDG&E's explanation of exigent conditions is insufficient to justify beginning
4 to utilize outsourced crews in 2019. While SDG&E states that outsourced crews
5 were utilized as a result of downtime and loss of production due to exigent
6 conditions in 2019, the number of exigent conditions in 2019 did not increase from
7 2017 or 2018 when outsourced crews were not utilized.³⁹

8 SDG&E does not provide sufficient evidence that increased work volume
9 created a need for outsourced crews in 2019. Cal Advocates requested supporting
10 documentation that wildfire cost increases were driven by work volume at the same
11 time SDG&E was hiring outsourced crews. SDG&E's response states that from 2018
12 to 2019, 4,470 less trees were inspected, 14,075 less trees were trimmed, and 903
13 more trees were removed.⁴⁰ The increase in tree removals, however, is almost
14 entirely due to routine work – SDG&E only removed 18 more trees due to hazardous
15 conditions outside the routine cycle than in 2018 and still 31 less hazard trees than
16 in 2017.⁴¹ An increase of only 18 tree removals from the previous year, while tree
17 trimming activities decreased elsewhere, does not support that increased workload
18 is responsible for outsourced crews.

19 Cal Advocates recommends an adjustment of \$979,636.69 to remove costs
20 incurred for Outsourced Crews and Exigent Conditions. Although SDG&E did not
21 utilize outsourced crews prior to 2019, SDG&E does not provide evidence that these
22 costs are reasonable, supported by increased workload, or are a necessary
23 incremental response to increased wildfire mitigation activities.

³⁸ SDG&E's supplemental response to data request PubAdv-SDG&E-001-RYD, Q. 11.

³⁹ SDG&E's supplemental response to data request PubAdv-SDG&E-001-RYD, Q. 9 and Q. 11.

⁴⁰ SDG&E's supplemental response to data request PubAdv-SDG&E-001-RYD, Q. 8.

⁴¹ SDG&E's supplemental response to data request PubAdv-SDG&E-001-RYD, Q. 3a.

1 **C. Administrative and Other Employee Costs**

2 The remaining TTBA costs are categorized as Administrative and Other
3 Employee Costs. These costs represent approximately \$1.69 million, or 5%, of total
4 2019 TTBA spending. SDG&E recorded \$106,787.14 more Administrative and Other
5 Employee costs in 2019 than in 2018. Table 2-6 below shows SDG&E's recorded
6 costs and Cal Advocates' recommendation regarding Administrative and Other
7 Employee Costs.

8 **Table 2-6**
9 **2019 Administrative and Other Employee Costs**
10 **(in 2019 Dollars)⁴²**

Description (a)	SDG&E 2019 Recorded Costs (b)	Cal Advocates Adjustment (c)	Difference (d)
Admin Expenses	256,366.45	\$128,726	\$127,640.45

11 **1. Admin Expenses**

12 SDG&E recorded \$256,366.45 in 2019 Admin Expenses in the TTBA.
13 SDG&E's 2019 Admin Expenses are \$91,298.24 more than 2018 expenses of
14 \$165,068.21 and \$172,542.52 more than 2017 expenses of \$83,823.93. According
15 to SDG&E, "the increase resulted primarily from the purchase of Panasonic
16 Toughbooks."⁴³ Panasonic Toughbooks are field computers that SDG&E provides to
17 its contractors for general work activities.⁴⁴ SDG&E recorded \$128,726 related to
18 Panasonic Toughbooks in 2019.

19 Cal Advocates recommends an adjustment of \$128,726 to remove costs
20 incurred for Admin Expenses associated with Panasonic Toughbooks recorded in
21 the TTBA. The incremental costs of purchasing additional Panasonic Toughbook
22 computers are not consistent with the Commission's directives regarding the TTBA.

⁴² Costs breakdowns are provided in the spreadsheet, "2017 – 2019 TTBA O&M by categoryDR1Q1 - Supplemental.xlsx" in SDG&E's supplemental response to data request PubAdv-SDG&E-001-RYD, Q. 1.

⁴³ SDG&E's response to data request PubAdv-SDG&E-006-RYD, Q. 2a.

⁴⁴ SDG&E's response to data request PubAdv-SDG&E-006-RYD, Q. 1a.

1 According to the Commission, the purpose of the two-way balancing account is to
2 “enable SDG&E to act more quickly in case further activities to mitigate wildfire risk
3 become necessary.”⁴⁵ The purchase of additional field computers was not in
4 response to wildfire risk as they were “not utilized exclusively for wildfire mitigation
5 related activities.”⁴⁶ Instead, SDG&E ordered the majority of these next generation
6 field computers in the final months of 2019 for “office work-related business and
7 computer applications.”⁴⁷
8

⁴⁵ D.19-09-051 at p. 267.

⁴⁶ SDG&E’s response to data request PubAdv-SDG&E-006-RYD, Q. 2a.

⁴⁷ SDG&E’s response to data request PubAdv-SDG&E-004-RYD, Q. 1 and data request PubAdv-SDG&E-006-RYD, Q. 2c. Invoices provided by SDG&E show \$79,005.69 for computers ordered in November and \$31,120.75 for computers ordered in October.

1 **V. WITNESS QUALIFICATIONS**

2 My name is Ryan Andresen. My business address is 505 Van Ness Avenue,
3 San Francisco, California. I am employed by the California Public Utilities
4 Commission as a Public Utilities Regulatory Analyst in the Public Advocates Office,
5 Energy Cost of Service and Natural Gas Branch.

6 I received a Bachelor of Science degree in Environmental Economics and
7 Policy from the University of California, Berkeley in 2020. For the Pacific Gas &
8 Electric Company Securitization proceeding, I conducted joint analysis and assisted
9 in preparation of Cal Advocates testimony.

10 Prior to joining the Public Advocates Office in 2020, I worked on several
11 research projects analyzing the impact of electric utility regulation on ratepayers. My
12 Bachelor's Honors Thesis estimated the burden of public utility pricing schedules on
13 various ratepayer demographics.

14 This completes my prepared testimony.

Exhibit 04

Cal Advocates Prepared Testimony of Tamara Godfrey (Executive Summary),
dated December 8, 2020

Docket : A.20-07-003
Exhibit Number : CalAdvocates-01
Commissioner : Randolph
ALJ : Lau
Witness : Godfrey



PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION

**Report on the Results of Operations
for
San Diego Gas & Electric Company
Recovery of the 2019 Undercollected
Balance Recorded in the Tree Trimming
Balancing Account**

Executive Summary

San Francisco, California
December 8, 2020

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1 **EXECUTIVE SUMMARY**

2 **I. INTRODUCTION**

3 The Public Advocates Office at the California Public Utilities Commission (Cal
4 Advocates) submits its reports and exhibits in response to San Diego Gas & Electric
5 Company’s (SDG&E) Application (A.) 20-07-003, in which it requests recovery of the
6 undercollection recorded in its Tree Trimming Balancing Account (TTBA).

7 This exhibit presents Cal Advocates’ executive summary regarding SDG&E’s
8 2019 Operations and Maintenance (O&M) expenses incurred for wildfire mitigation
9 activities. SDG&E’s 2019 General Rate Case (GRC) Decision (D.19-09-051)
10 modified its Tree Trimming Balancing Account (TTBA) from a one-way to a two-way
11 balancing account.¹ SDG&E was directed to file an application for recovery if the
12 undercollected balance exceeds 35% of its authorized revenue requirement of \$24.2
13 million.²

14 SDG&E requests that the California Public Utilities Commission (Commission
15 or CPUC) review and approve as reasonable its TTBA undercollection of \$10.4
16 million.³ SDG&E seeks authorization to amortize in rates the December 31, 2019
17 undercollection over 12 months.⁴

18 SDG&E’s TTBA undercollection request includes costs incurred for expanded
19 vegetation management programs, including its 25-foot clearance which “expanded
20 beyond legal and regulatory requirements.”⁵ The TTBA also includes costs incurred

¹ D.19-09-051, Ordering Paragraph 8.b. at p. 778 (See Application p. 1).

² Application p. 1.

³ Application p. 1.

⁴ SDG&E’s Prepared Direct Testimony of Claire F. Olegario in support of Application (Ex. SDG&E-02), p. CFO-5.

⁵ SDG&E’s Prepared Direct Testimony of Don Akau in support of Application (Ex. SDG&E-01), p. DA-8. In regard to clearances for fast-growing trees, SDG&E has identified certain fast-growing tree species that required clearances of 16 to 20 feet to achieve desired wildfire mitigation. SDG&E plans to trim those trees to a 25-foot clearance and states the “25-foot clearance is a substantial increase from previously implemented practices” (Application, p. 3).

1 for additional labor for tree trimming crews, increased hazard tree removals,
2 enhanced audits and patrols in High Fire Threat Districts, equipment and information
3 systems support.⁶

4 **II. SUMMARY OF RECOMMENDATIONS**

5 This section provides an overview and summary of SDG&E's request and Cal
6 Advocates' recommendation regarding 2019 undercollected O&M costs associated
7 with enhanced wildfire mitigation activities. SDG&E proposes cost recovery of \$10.4
8 million in revenue requirement associated with the undercollected balance recorded
9 in the TTBA.

10 Cal Advocates recommends recovery of \$6.3 million for SDG&E's
11 undercollected O&M costs recorded in TTBA. Cal Advocates' recommendation is
12 \$4.1 million less than SDG&E's request. The basis for Cal Advocates'
13 recommendations are as follows: SDG&E did not include adequate evidence or data
14 demonstrating that an expanded 25-foot clearance from distribution facilities reduces
15 wildfire risk; SDG&E did not provide adequate documentation demonstrating that it
16 tracked or recorded costs associated with Customer Refusals or provide calculations
17 for its estimates; SDG&E did not provide an amount of increased TTBA costs
18 resulting from exigent conditions; and the cost recovery for the purchase of
19 additional field computers was not in response to wildfire activity and were not
20 utilized exclusively for wildfire mitigation related activities.

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22 Table 1-1 compares Cal Advocates' recommendation and SDG&E's
23 undercollected O&M cost request.

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⁶ SDG&E's Prepared Direct Testimony of Claire F. Olegario in support of Application (Ex. SDG&E-02), p. CFO-4.

Table 1-1
2019 Undercollected O&M Costs
(\$ Million)

Description (a)	SDG&E Proposed ⁷ (b)	Cal Advocates Recommended (c)	Amount SDG&E>Cal Advocates (d=b-c)	Percentage SDG&E>Cal Advocates (e=d/c)
Tree Trimming Balancing Account	\$10.4	\$6.3	\$4.1	64.8%

SDG&E proposes to recover the revenue requirement by amortizing the December 31, 2019 undercollection of \$10.4 million in rates over a 12 month period, with its annual electric rate consolidated advice letter submission on January 1 of the year following approval of its application and ending on December 31.⁸

Cal Advocates recommends that SDG&E recover \$6.3 million for undercollection costs recorded in the TTBA by utilizing SDG&E's proposed rate recovery mechanism and amortization schedule mentioned above.

SDG&E's testimony did not include a Results of Operations (RO) Model for Cal Advocates to review, evaluate and utilize.⁹ Therefore, Cal Advocates was not able to integrate its recommended adjustments to SDG&E's TTBA undercollected O&M costs, and calculate a Revenue Requirement utilizing an RO computer model.

SDG&E did not provide workpapers that discussed the justification for, or the costs associated with, individual O&M costs. This omission delayed Cal Advocates' review and made it difficult to determine the reasonableness of the specific wildfire mitigation activities include in the TTBA.

⁷ Application p. 1.

⁸ SDG&E's Prepared Direct Testimony of Claire F. Olegario in support of Application (Ex. SDG&E-02), p. CFO-5.

⁹ SDG&E's testimony did not include a Results of Operations computer model or supporting workpapers.

1 Cal Advocates recommends that the Commission adopt certain protocols
2 directing SDG&E to include workpapers with its applications that contain critical
3 information on the costs requested for recovery in the balancing account.

4

1 **III. PROCEDURAL BACKGROUND AND SCHEDULE**

2 On July 1, 2020, SDG&E filed its TTBA Application, A.20-07-003, with the
3 Commission. Cal Advocates filed a timely Protest on August 5, 2020. A telephonic
4 Prehearing Conference (PHC) was held on August 18, 2020. An Assigned
5 Commissioner’s Scoping Memo and Ruling (Memo/Ruling) was issued on
6 September 1, 2020. The Memo/Ruling established a TTBA procedural schedule as
7 shown in Table 1-2.

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**Table 1-2
TTBA Procedural Schedule for SDG&E**

Description	Dates
Intervenor Testimony Served	December 8, 2020
SDG&E Rebuttal Testimony	January 8, 2021
Joint Case Management Statement	January 18, 2021
Evidentiary Hearings	January 25, 2021
Concurrent Opening Briefs	February 12, 2021
Concurrent Reply Briefs	February 26, 2021
Proposed Decision	Second Quarter 2021

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The procedural schedule requires intervenors to serve their testimony by December 8, 2020. Cal Advocates fulfills the requirement by serving its testimony today.

15 **IV. ORGANIZATION OF CAL ADVOCATES’ SHOWING / SUMMARY**
16 **OF DIFFERENCES**

17 This section: (1) indicates how Cal Advocates’ exhibits are organized; and (2)
18 briefly highlights the major differences between Cal Advocates and SDG&E with

1 respect to the cost recovery of its undercollected O&M expenses tracked in
2 SDG&E's TTBA.

3 **A. Organization of Cal Advocates' Exhibits**

4

5 Table 1-3 shows the specific exhibits and subject matters for which each Cal
6 Advocates witness is responsible.

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**Table 1-3
Cal Advocates' Exhibits**

Exhibit Number	Subject	Witness
CalAdvocates-01	Executive Summary	Tamera Godfrey
CalAdvocates-02	Recovery of 2019 Undercollected Balance in the Tree Trimming Balancing Account	Ryan Andresen

10

11 **B. Summary of Cal Advocates' Recommendations**

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The following summarizes the recommendations contained within each of Cal
14 Advocates' exhibits that address SDG&E's application.

15

***Exhibit CalAdvocates-01
Executive Summary***

This exhibit provides a brief overview of SDG&E's request; presents the overall organization of Cal Advocates' exhibits; and summarizes the differences between Cal Advocates' and SDG&E's 2019 undercollected O&M expenses recorded in its TTBA.

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***Exhibit CalAdvocates-02
Recovery of the 2019 Undercollected Balance Recorded in the
Tree Trimming Balancing Account***

This exhibit presents the analyses and recommendations of Cal Advocates regarding SDG&E's undercollected O&M expenses recorded in its TTBA for 2019 associated with enhanced wildfire activities.

- Cal Advocates' recommendation of \$6.3 million for SDG&E's undercollected TTBA balance be adopted. Cal Advocates' recommendation of \$6.3 million is \$4.1 million lower than SDG&E's request.
- Cal Advocates recommends an adjustment of \$2,948,490 associated with SDG&E's expanded clearance program.
- Cal Advocates recommends an adjustment of \$41,900 associated with SDG&E's customer refusals.
- Cal Advocates recommends an adjustment of \$979,637 associated with SDG&E's outsourced crews.
- Cal Advocates recommends an adjustment of \$128,726 associated with SDG&E's administration activities.
- Cal Advocates recommends that the Commission adopt certain protocols directing SDG&E to include workpapers with its application that contain critical information on the costs requested for recovery in its TTBA.
- Cal Advocates recommends that the Commission adopt certain protocols directing SDG&E to provide with its application, specific O&M costs that can be tracked in its accounting system and compared to amounts requested for recovery in its TTBA.

1 **V. WITNESS QUALIFICATIONS**

2 My name is Tamera L. Godfrey. My business address is 505 Van Ness
3 Avenue, San Francisco, California. I am employed by the Public Advocates Office
4 (Cal Advocates) as a Program and Project Supervisor in the Energy Cost of Service
5 and Natural Gas Branch.

6 I received a Master’s Degree in Public Administration and a Bachelor of Arts
7 Degree in Political Science from California State University, Hayward. Since joining
8 Cal Advocates in 1998, I have prepared testimony on the following subject matters:

- 9 • Administrative & General expenses and Total Compensation for Southern
10 California Edison Company’s (SCE) 2003 and 2006 General Rate Cases
11 (GRC), Pacific Gas and Electric Company’s (PG&E) 2007 GRC, and
12 Southern California Gas Company’s (SCG) and San Diego Gas & Electric
13 Company’s (SDG&E) 2004 Cost of Service;
14
- 15 • Employee Benefits expenses (excluding Pension and PBOPs) and
16 Incentive Compensation for SDG&E’s and SCG’s 2008 GRC;
17
- 18 • Transmission and Distribution Operations and Maintenance (O&M)
19 expenses in the SCE’s 2009, 2012, and 2015 GRCs, and on O&M
20 expenses and Short-Term Incentive Plan expenses in the PG&E 2011 and
21 2014 GRCs;
22
- 23 • Energy Supply O&M expenses in PG&E’s 2014 GRC;
24
- 25 • Customer Services O&M expenses in SDG&E’s and SCG’s 2016 GRCs;
26 SCE Results Sharing Associated with PBR Performance Incentives and
27 Related Adjustments in Order Instituting Investigation (I).06-06-014;
28
- 29 • Pipeline Records Integration Program Costs for PG&E’s Pipeline Safety
30 Enhancement Plan, in Order Instituting Rulemaking (R.) 11-02-019;
31
- 32 • Shared Services costs in PG&E’s 2017 GRC;
33
- 34 • Transmission and Distribution O&M expenses and associated Other
35 Operating Revenues in SCE’s 2018 GRC;
36
- 37 • Electric Distribution O&M expenses in SDG&E’s 2019 GRC;
38
- 39 • Electric Distribution O&M expenses in PG&E’s 2020 GRC; and
40

- 1 • Transmission and Distribution (Grid Activities) and Wildfire Management
2 O&M expenses in SCE's 2021 GRC Track 1.

3 I participated on the Total Compensation Study associated with SCE's 2006
4 and 2009 GRCs, PG&E's 2007 GRC, and SCG's and SDG&E's 2008 GRC. I have
5 also served as project coordinator and assistant project coordinator and have
6 testified numerous times before the Commission.

7 This completes my prepared testimony.

Exhibit 05

SDG&E Rebuttal Testimony of Michael Daleo, dated January 8, 2021

Company: San Diego Gas & Electric Company (U 902-E)
Proceeding: 2019 Tree Trimming Balancing Account
Application: A.20-07-003
Exhibit: SDG&E-_____

SAN DIEGO GAS & ELECTRIC COMPANY
REBUTTAL TESTIMONY OF
MICHAEL DALEO

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



JANUARY 8, 2021

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**REBUTTAL TESTIMONY OF
MICHAEL DALEO
ON BEHALF OF SDG&E**

I. INTRODUCTION AND BACKGROUND

Q. Please state your name and identify your current position.

A. My name is Michael Daleo. I am the System Forester at San Diego Gas & Electric Company (SDG&E).

Q. Have you previously submitted testimony in this proceeding?

A. No. My qualifications are at the conclusion of my testimony

Q. What is the purpose of your rebuttal testimony?

A. My rebuttal testimony (1) adopts the direct testimony of Don Akau supporting SDG&E's Application for Recovery of Undercollection Recorded in the Tree Trimming Balancing Account;¹ and (2) responds to the "Report on the Results of Operations for San Diego Gas & Electric Company Recovery of the 2019 Undercollected Balance in the Tree Trimming Balancing Account" prepared by Mr. Ryan Andresen on behalf of the Public Advocates Office (Cal Advocates) at the California Public Utilities Commission submitted in this proceeding on December 8, 2020 (Report). More specifically, I respond to Mr. Andresen's discussion of SDG&E's general costs recorded to the Tree Trimming Balancing Account (TTBA) and the Report's conclusions regarding SDG&E's costs associated with customer refusals, outsourced crews, and administrative technology costs.

As a preliminary matter, the absence of a response to any particular issue in this rebuttal testimony does not imply or constitute agreement by SDG&E with the proposals or contentions of Cal Advocates.

¹ SDG&E Prepared Direct Testimony of Don Akau (July 1, 2020) (Exhibit SDG&E-01 (Akau)).

1 Q. How is your testimony organized?

2 A. In Section II, I review the general causes of SDG&E's undercollection in the TTBA. In
3 Section III, I discuss the increase in amount of tree-work performed at Time and Equipment
4 (T&E) rates, which are higher than SDG&E's fixed unit cost tree rates. In Section IV, I discuss
5 how SDG&E tracks TTBA costs and address current systemic limitations to isolate specific tree
6 trim costs. In Section V, I address Cal Advocates' analysis of costs associated with customer
7 refusals and explain that the increase in costs over 2018 is not specifically associated with the
8 EVM program. In Sections VI and VII, I respond to Cal Advocates' analysis of "Outsourced
9 Crews and Exigent Conditions,"² to distinguish the costs associated with emergency weather
10 events and other external conditions, and to explain the necessity of the outsourced crews at the
11 end of 2019. In Section VIII, I respond to Cal Advocates' analysis of SDG&E's increased
12 administrative expenses, including the purchase of additional Toughbook Computers. I explain
13 that that routine information technology expenses are included in SDG&E's GRC forecasts and
14 additional expenses were necessary to support the tree-trimming activities of outsourced crews,
15 and supported SDG&E in meeting both its vegetation management requirements as well as its
16 wildfire mitigation goals.

17 Cal Advocates' analysis of SDG&E's Enhanced Vegetation Management (EVM)
18 program, specifically its target 25-foot clearance for certain species in the High Fire Threat
19 District (HFTD) is addressed by the rebuttal testimony of Mr. Tyson Swetek on behalf of
20 SDG&E, served concurrently herewith.

21

² Report at 11-12.

1 **II. SDG&E'S TTBA UNDERCOLLECTION**

2 Q. Please review the general causes of the TTBA undercollection.

3 A. SDG&E's TTBA expenditures increased in 2019 due to several factors, including: (1)
4 the identification, trimming, and removal of more hazard (also referred to as "reliability") trees;
5 (2) SDG&E's Enhanced Vegetation Management Program, which expanded tree-trim clearances
6 for high-growth species in the HFTD; (3) enhanced 100% vegetation management audits in the
7 HFTD, resulting in additional workloads; and (4) increased labor costs due to contract rate
8 increases as well as a statewide surge in demand for line-qualified tree trimmers and certified
9 arborists, as utilities addressed the urgent wildfire mitigation vegetation management needs
10 across California.³ Due to the nature of the additional work, specifically hazard tree mitigation,
11 trimming, and removal, an increased amount of the tree-trimming I described above was
12 performed at Time and Equipment rates, which are substantially higher than SDG&E's
13 contractual unit cost rates. In addition to these workload increases, SDG&E simultaneously
14 negotiated and implemented an average 11% general increase in rates for its contract tree-
15 trimmers, which impacted costs across the entirety of SDG&E's territory.

16 In general, SDG&E's 2019 vegetation management costs were reasonably incurred
17 because they arose from vegetation management activities intended to promote the safe operation
18 of SDG&E's electric system, and due to circumstances outside of SDG&E's control (or ability to
19 predict in previous General Rate Case (GRC) forecasts), such as labor market changes.

³ Exhibit SDG&E-01 (Akau) at DA-1-DA-2.

1 The chart below provides the general breakdown of SDG&E's TTBA costs for years
 2 2017 through 2019,⁴ in which a majority of the costs are driven by the tree-trimming activities
 3 described above.

4 **TABLE 1**

2017 - 2019 SDG&E's TTBA Costs			
Category	2017	2018	2019
Admin	83,824	165,068	256,366 ⁵
Cash Discounts	(25,407)	(34,398)	(57,435)
Catering	2,824	2,936	3,177
Consulting	60,060	17,001	31,390
Employee Recognition	16	-	50
Employee Travel	14,254	11,561	7,065
Field Hardware and Software Support	206,691	110,596	108,210
Labor	1,087,177	1,105,280	1,144,275
Meals & Entertainment	1,266	937	1,014
Office Supplies/Office Equipment	11,197	14,372	8,170
Tree Trimming	21,590,412	26,139,234	32,271,592
Vacation & Sick Overheads	179,044	185,175	183,034
TOTAL	23,211,359	27,717,762	33,956,907

5
 6 Q. Was the increase in contractual tree-trimming rates anticipated or included in SDG&E's
 7 GRC forecast?

8 A. SDG&E did not anticipate an increase at the level experienced. SDG&E forecasted its
 9 TTBA costs using a four-year average from 2013-2016. The forecast excluded 2012 costs,

⁴ SDG&E Response to PUBADV-SDG&E-DR-001 at q.1 – Supplemental.

⁵ SDG&E's 2019 purchase of additional Toughbook Computers, as discussed by Cal Advocates in the Report and addressed in the testimony below, is included in this category of spend.

1 because SDG&E considered those unusually high.⁶ Labor cost increases were anticipated and
2 factored within the GRC related to an annual contract agreement rate increase, equipment, and
3 fuel cost. Forecasted contractor costs also factor the anticipated volume of planned tree-
4 trimming and removal activities. Typically, labor cost increases are expected to be
5 approximately 3% annually. But SDG&E had previously deferred certain contractual rate
6 increases since 2015, so the 2019 contractual rate increases actually trued-up over a period of
7 several years. The 2019 rate increases averaged approximately 11% over prior years, and went
8 into effect in September 2019. The approximate 11% increase far exceeded the anticipated
9 average increase for contractor costs that SDG&E used in its GRC forecasts.

10 Q. In addition to the contractual rate increases, did wildfire mitigation activities contribute to
11 SDG&E's TTBA undercollection?

12 A. Yes. SDG&E's Test Year 2019 GRC Decision (D.) 19-09-051, anticipated that SDG&E
13 "may find it necessary to conduct enhanced and additional [wildfire] risk mitigation activities,"
14 and granted SDG&E a two-way balancing account to allow SDG&E to enact additional wildfire
15 mitigation activities as necessary.⁷ Some of the undercollected TTBA balance is due to these
16 additional wildfire mitigation activities, as anticipated in the GRC decision and discussed in this
17 application.

18 Some cost increases were due to multiple factors related to routine tree-trimming work as
19 well as vegetation management activities to reduce wildfire risk, including increased inspections
20 and post-trim audits, greater post-trim clearances, and a higher volume of tree work. As a result
21 of the increased vegetation management activities that resulted from some of these initiatives,

⁶ D.19-09-051 at 266-267.

⁷ D.19-09-051 at 267.

1 including the enhanced audits throughout the HFTD, SDG&E required additional outsourced
2 labor, and conversion of unit cost to hourly T&E rates.

3 Q. Did SDG&E perform increased hazard tree removals or trims in 2019?

4 A. Yes. SDG&E removed approximately 903 more trees in 2019 over 2018. The total
5 number of trees inspected, trimmed, and removed across SDG&E's service territory is
6 summarized below:⁸

Overall Trees Worked	2017	2018	2019
Inspected	455,250	457,800	453,330
Trimmed	155,785	175,990	161,915
Removed	7,189	8,105	9,008

7 As previously addressed by Mr. Akau, SDG&E experienced an increase in "hazard" tree
8 volumes in 2019 compared to previous years. Hazard trees are a subset of SDG&E's tree
9 inventory, consisting of trees tall enough to strike overhead electric lines in the event of a whole
10 tree failure or limb break. The following table provides the number of trees inspected, trimmed,
11 and removed between 2017 and 2019:⁹

Hazard Trees	2017	2018	2019
Inspected	6,875	15,361	20,995
Trimmed	8,497	11,863	18,369
Removed	540	491	509

12 The Report notes that in 2019, SDG&E removed only 18 more hazard trees than in 2018 (and
13 less than 2017 removals), however, Cal Advocates fails to provide context and include the fact
14 that SDG&E trimmed approximately 6,506 more hazard trees in 2019 than 2018 (and nearly
15 10,000 more hazard trees than in 2017).

⁸ SDG&E Response to PUBADV-SDG&E-DR-001 at q.8 - Supplement.

⁹ SDG&E Response to PUBADV-SDG&E DR-001 at q.3 - Supplement.

1 Q. Did the cost of hazard tree mitigations, such as trims and removals, increase in 2019?

2 A. Yes, the fixed-unit cost of an average hazard tree removal increased from \$666.45 in
3 2018 to \$810.59 in 2019.¹⁰

4 Many of the hazard tree trims and removals, however, were not performed at standard
5 unit cost rates. For several reasons, including but not limited to employee and contractor safety,
6 reliability, and tree health, these trims and removals were performed at hourly T&E rates, which
7 are higher than unit cost rates, as discussed below. Due to system limitations, SDG&E cannot
8 specifically identify the cost of individual tree trims and removals at T&E rates, and thus cannot
9 identify the average cost of T&E trims or removals.

10 Q. What are some causes of the increase in hazard tree removals and trims in 2019?

11 A. Some of the hazard tree mitigation work is due to SDG&E's EVM Program and added
12 clearances. But a significant portion of the increased hazard tree work is related to SDG&E's
13 increased inspections and audits in 2019. Generally, SDG&E performs "level 1" hazard tree
14 inspections within the entire service territory. These inspections include a visual assessment by
15 SDG&E contractors of trees adjacent to the power lines to identify visible problems such as
16 broken branches, cracks, heavy leans, and lifting soil. Within the HFTD, SDG&E performs
17 more detailed "level 2" hazard tree assessments. The off-cycle patrols are a second inspection
18 activity within the calendar year. The "level 2" inspections are performed by ISA Certified
19 Arborists and include a detailed evaluation of all trees located within the "utility strike zone."
20 The utility strike zone is the area that includes trees tall enough to strike the power lines if failure
21 occurred at ground level. The "level 2" inspection includes a 360-degree assessment of a tree.

¹⁰ See SDG&E Response to PUBADV-SDG&E-DR-001 at q.3(b) – Supplement.

1 These level 2 inspections target indicators not easily identifiable without proper training, such as
2 included bark, disease, infestation, root rot, weak branch attachments, and decay.

3 Prior to 2019, SDG&E performed "level 2" hazard tree inspections twice annually in the
4 areas of the service territory where the routine inspection schedule occurs in the fall. The
5 reasoning for this schedule was to perform the second inspection prior to the onset of the Santa
6 Ana fire season. Beginning in 2019, SDG&E modified the scope of its off-cycle, enhanced
7 inspections to include a second "level 2" inspection throughout the entire HFTD. This
8 modification in scope and schedule resulted in the identification of additional reliability ("hazard
9 tree") work resulting in higher overall costs. Again, the purpose of this work is enhanced safety
10 and wildfire mitigation.

11 Additionally, in 2019, SDG&E enacted a complete line patrol and 100% audit of all
12 hazard and reliability trim work in the HFTD. The "audits resulted in the trimming and/or
13 removal of approximately 417 additional trees, 227 of which were deemed hazard/reliability
14 trees."¹¹

15 Q. Is the increase in "hazard tree removals" limited to only trees that fall within SDG&E's
16 enhanced vegetation management program, and specifically the 25-foot clearance program?

17 A. No, the increased hazard tree removals are not limited to SDG&E's enhanced vegetation
18 management program. Hazard tree work occurs throughout the service territory all year round
19 and may be included in the tree contractor's routine or enhanced work package.

20 SDG&E uses the term "reliability" synonymously with "hazard." A reliability tree is one
21 that poses a potential threat to the power lines because it is dead, dying, and/or has a structural
22 defect. Reliability work is greater in scope than routine trimming. Similar to routine trimming,

¹¹ See Exhibit SDG&E-01 (Akau) at DA-11.

1 reliability trimming has a fixed, unit rate. Contractors get paid higher for a reliability trim than a
 2 routine trim. Routine, fixed unit rate work (trim or removal) may be converted to hourly T&E if
 3 the job requires more work than the unit cost scope.

4 **III. INCREASED T&E WORK**

5 Q. Please discuss the two types of billing used for contractor tree-trim work.

6 A. Most routine tree-trimming and removal costs are performed under a fixed, unit cost
 7 (Unit Cost) rate. Work may be converted to T&E rates if the scope is beyond Unit Cost
 8 specifications as contractually provided, and approved as such. Examples of why work is
 9 converted to hourly may include: safety restrictions, specialized equipment, traffic control,
 10 excessive time to complete work, wood disposal, and need for additional crews.

11 Q. Was there an increase in T&E billed tree work in 2019 over previous years?

12 A. Yes. SDG&E believes that the increased T&E work associated with hazard-tree trims
 13 and removals, as well as outsourced contractor use, was a significant factor in the TTBA
 14 undercollection in 2019. The increases in tree-trimming costs by SDG&E’s primary contractors,
 15 broken down by total amount billed at unit cost, versus total amount billed at T&E rates is as
 16 follows:

17 **Utility Tree Service (“UTS”)**

Row Labels	2017	2018	2019
Units	5,273,291.66	6,704,129.64	8,857,533.90
T&E	3,151,768.84	3,510,619.59	5,608,891.88
Total	8,425,060.50	10,214,749.23	14,466,425.78

18
 19
 20 **Davey Tree**

Row Labels	2017	2018	2019
Units	5,891,710	8,318,533	9,744,994
T&E	2,035,766	1,960,409	4,442,542
Total	7,927,477	10,278,942	14,187,536

1 In addition to the larger amount spent on T&E work from 2018 to 2019, T&E work costs, as a
2 proportion of total overall work grew from 2018 to 2019.

3 **IV. TTBA COST TRACKING**

4 Q. How does SDG&E track and record its TTBA costs?

5 A. All TTBA costs when recorded include a General Ledger (G/L) account as well as an
6 Internal Order (I/O) number. The G/L account designates the nature of the cost and where it will
7 be grouped on SDG&E's financial statements. The I/O number is used to track costs by project
8 and is tagged with a specific operations and maintenance (O&M) Category code (refundable
9 code) related to the TTBA. This tagging allows for accounting to capture the correct costs in the
10 TTBA.

11 Q. Are TTBA costs typically broken down by the categories identified in the Application or
12 by Cal Advocates in their Report?

13 A. No. To assist in the application process, SDG&E attempted to isolate specific cost
14 drivers that contributed to its undercollection. In response to data requests from Cal Advocates,
15 SDG&E further broke down its TTBA costs in the categories listed in Table 1. SDG&E used the
16 General Ledger accounts and I/O codes to break down and identify certain costs to categorize
17 them for the application. For instance, certain "Admin" costs, like computer equipment, could
18 have easily been grouped with "Field Hardware and Software Support."

19 With respect to tree-trimming, SDG&E currently does not have the system capability to
20 isolate specific T&E costs associated with trims versus removals. As noted by Cal Advocates,
21 tree-trimming makes up greater than 95% of TTBA recorded costs. In its application, SDG&E
22 outlined certain areas, such as the EVM Program, customer refusals, enhanced audits, the need
23 for additional labor, and emergency conditions such as red flag warning events, as drivers of the

1 2019 increased costs. But those categories do not necessarily reflect its own G/L account or
2 specific I/O numbers, so many of the costs associated with specific tree-trimming activities
3 represent SDG&E estimates. Additionally, though contractor invoicing includes documentation
4 of hourly work, SDG&E's current invoicing system does not allow for entering the cost of
5 hourly work versus fixed rate on a per-tree basis separately.

6 Q: Is SDG&E in the process of making system improvements that may allow for better
7 tracking of vegetation management and tree-trimming costs?

8 A: Yes, SDG&E is in the process of a system upgrade to EPOCH, scheduled to be
9 implemented in early 2021. SDG&E is working on changes to improve tracking of work in the
10 new system. SDG&E anticipates that the system upgrades should allow for better identification
11 of tree-trimming costs in future applications.

12 **IV. SDG&E'S CUSTOMER REFUSAL COSTS**

13 Q. Does SDG&E specifically track costs associated with customer refusals?

14 A. No. SDG&E does not specifically track costs associated with customer refusals. Refusals
15 are tracked by the contractor as a component of tree-trimming. The cost of each customer
16 refusal will vary considerably based on time spent to resolve the dispute, number of Vegetation
17 Management personnel involved in the process, whether a customer letter is sent, and whether
18 external engagement of legal and/or law enforcement becomes necessary. SDG&E made an
19 estimation of the cost of a refusal using an estimated average time spent per refusal, multiplied
20 by hourly contractor rate.

21 Q. Cal Advocates requests an adjustment of the difference (\$41,900) between 2018 and
22 2019 costs associated with customer refusals. Are SDG&E's increased customer refusal costs
23 solely associated with the expanded clearances in the HFTD?

1 A. No. SDG&E experienced 922 customer refusals in 2019, an increase of 48 over 2018.
2 Customer refusals increased significantly from 2017-2018, as shown below:¹²

Refusals	2017	2018	2019
Properties	528	874	922

3 Though there was an increase in initial customer refusals associated with expanded clearances,
4 some of these refusals that were resolved were not always recorded and therefore not included in
5 incremental cost calculation. SDG&E estimates that some of the incremental increases
6 associated with the customer refusals are the result of the general labor cost increases previously
7 discussed.

8 Q. Is the entirety of SDG&E’s increased customer refusal costs over 2018, as identified by
9 Cal Advocates (\$41,900), associated with the expanded 25-foot clearance in the HFTD?

10 A. No.

11 **V. SDG&E’S COSTS ASSOCIATED WITH “EXIGENT CONDITIONS”**

12 Q. SDG&E identified “exigent conditions,” such as red flag warning events, extreme fire
13 danger, and other extreme weather events, such as Extreme Fire Potential Index days, as one of
14 the drivers contributing to its 2019 undercollection. How do these events impact tree-trimming
15 costs?

16 A. Maintaining a tree-trimming schedule is critical for safety, compliance, and service
17 reliability. Work volume directly impacts the ability of the tree contractor to maintain schedule.
18 These unanticipated emergency events can delay tree-trimming activity, because the extreme fire
19 danger during these events effectively shuts down tree operations in the HFTD, except for
20 emergency work deemed necessary to prevent outage or ignition. These weather conditions are

¹² SDG&E Response to PUBADV-SDG&E-DR-001 at q.4(a) – Supplement.

1 “exigent” events outside of SDG&E’s control that delay necessary tree-trimming work. Catching
2 up on delayed work may necessitate additional overtime costs.

3 Q. Were these extreme weather events a major driver in the increased 2019 TTBA costs?

4 A. No. Some of the 2019 weather events may have resulted in work delays late in 2019,
5 necessitating some overtime crews. Some 2018 weather events may have also led to delays in
6 2019, and may have contributed to the need for additional outsourced crews to catch up on
7 required work. Additionally, any emergency work performed during extreme conditions requires
8 additional fire prevention resources, which adds costs.

9 **VI. OUTSOURCED CREW COSTS**

10 Q. Cal Advocates recommends an adjustment of \$979,636.69 that SDG&E recorded to the
11 TTBA to hire outsourced crews. Mr. Andresen’s report associates the retention of outsourced
12 crews entirely with “exigent conditions” that SDG&E experienced in 2019. Did emergency
13 weather events and exigent conditions in 2019 necessitate SDG&E’s use of outsourced crews?

14 A. No. Cal Advocates inaccurately conflates the cost drivers associated with exigent and
15 emergency conditions with SDG&E’s need to use outsourced crews for tree-trimming work.

16 Q. Please describe the costs associated with the additional outsourced crews.

17 A. Due to the use of the additional outsourced crews, work that might otherwise have been
18 completed at unit cost rates was converted to T&E rates. Other costs included overtime, meals,
19 lodging, and per diem.

20 Q. Why did SDG&E require additional outsourced crews in 2019?

21 A. SDG&E used outsourced crews for the first time in 2019. The need for additional
22 outsourced crews was primarily due to the overall increase in the volume of tree work
23 (inspections, trims and removals) throughout the service territory in 2019, and the amount of

1 hazard/reliability tree work which often takes a much longer time to complete. These increased
2 workloads resulted in the tree contractors falling behind schedule.

3 To make up schedule, tree contractors must either add crew resources and/or work
4 overtime. SDG&E has two tree contractors, Utility Tree Service (UTS), and Davey Tree. Both
5 contractors needed to work overtime throughout most of 2019 to minimize a slip in schedule.
6 This work included both routine and enhanced tree operations. Davey Tree was not able to bring
7 on additional outsourced crews. In the fall of 2019, UTS added several additional tree crew
8 resources to help regain schedule. The additional outsourced UTS crews required lodging and
9 per diem, at significantly increased costs over traditional contract rates.

10 Q. What work did the additional outsourced crews perform?

11 A. The additional outsourced tree crews generally performed work routine tree-trimming
12 work outside the HFTD. The tree-trimming contractors who work year-round on SDG&E
13 property performed work in the HFTD, primarily for insurance-related reasons, and because
14 SDG&E's contractors are already trained to work in the HFTD.

15 Q. Was there substantial demand for tree-trimming crews statewide during 2019?

16 A. Yes, there was a substantial demand for tree crews statewide in 2019 due to the increase
17 in the volume of California tree work (driven by continued drought, insect infestation, fire), fire
18 response, and scope changes. Additional outsourced crews were needed from sources
19 throughout the country. Pacific Gas and Electric demands reduced a significant amount of the
20 available outsourced crews, making it difficult for SDG&E contractors to secure crews.

21 Q. Did the statewide demand for qualified tree-trimmers further drive up the costs associated
22 with the additional outsourced crews?

23 A. Yes.

1 **VII. ADDITIONAL SDG&E ADMINISTRATIVE COSTS**

2 Q. Cal Advocates recommends an adjustment of \$128,726 to remove costs associated with
3 the purchase of Panasonic Toughbook Computers (Toughbooks). Please describe how SDG&E’s
4 Vegetation Management Program uses the Toughbooks?

5 A. All SDG&E internal personnel and contractors use Panasonic Toughbooks as field
6 computers for daily work operations. They are the primary computing devices for SDG&E
7 vegetation management employees and contractors. The Toughbook units are required to
8 perform work. Contractors use the Toughbook units to access SDG&E’s work management
9 system, PowerWorks. PowerWorks is used to enter SDG&E’s tree database, issue work orders,
10 schedule work activities, perform data entry, and to record work completion. In total, 14
11 SDG&E employees and 237 contractors use the Toughbooks.¹³

12 Q. Why did SDG&E purchase additional Toughbooks in 2019?

13 A. Some Toughbook units were also purchased as a function of normal equipment repair and
14 replacement of aged units when needed. Contrary to Cal Advocates’ assertion that the “majority
15 of these” field computers were purchased in 2019 for “office work-related business and
16 computer applications,”¹⁴ the additional computer purchases supported increased contractor
17 personnel for use throughout SDG&E’s service territory, and to support all SDG&E tree-
18 trimming operations, including SDG&E’s wildfire mitigation activities.¹⁵ As noted by Cal

¹³ See SDG&E Response to PUBADV-SDG&E-DR-006 at q.1(b).

¹⁴ See Report at 14.

¹⁵ See SDG&E Response to PUBADV-SDG&E-DR-006 at q.1(a).

1 Advocates, SDG&E purchased several computers in late 2019 to facilitate the additional tree-
2 trimming crews, brought on to meet workload requirements.¹⁶

3 Q. Are computer purchases to support tree-trimming activities, such as the Toughbook units,
4 consistent with the Commission's directives regarding the TTBA?

5 A. Yes, the TTBA Preliminary Statement as approved by the Commission authorizes the
6 recording of all expenses associated with tree-trimming necessary to comply with both existing
7 and new state and regulatory rules. "Tree-trimming costs primarily include expenses for crews,
8 tree removals, mulching, and information systems support, among others."¹⁷ SDG&E forecasts
9 normal Information Technology (IT) expenditures and upkeep, including software updates,
10 reporting enhancements, and replacements, in its GRC. Complete system changes or full
11 replacements are typically covered in IT Capital projects. In this instance, the computer updates
12 and purchases were correctly recorded as O&M because they supported additional tree-trimming
13 personnel as well as normal upkeep and replacements.

14 Q. What vegetation management activities did the Toughbook purchases in 2019 support?

15 A. The computers support all aspects of SDG&E's Vegetation Management activities,
16 including wildfire mitigation.

17 **VIII. CONCLUSION**

18 Q. Do you have remarks in conclusion?

19 A. For the reasons stated above, SDG&E reasonably incurred the costs associated with the
20 TTBA undercollection and sought in this application. SDG&E respectfully requests that the

¹⁶ See SDG&E Response to PUBADV-SDG&E-DR-006 at q.1(e).

¹⁷ See SDG&E Preliminary Statement at Sheet 1, available at
http://regarchive.sdge.com/tm2/pdf/ELEC_ELEC-PRELIM_TTBA.pdf.

1 Commission authorize recovery of the full 2019 undercollected balance of approximately \$10.4
2 million.

3 Q. Does this conclude your prepared rebuttal testimony?

4 A. Yes.

5

1 **IX. QUALIFICATIONS**

2 My name is Michael Daleo. I am employed by San Diego Gas & Electric Company
3 (“SDG&E”) as the System Forester for the Vegetation Management Department. My business
4 address is 8315 Century Park Court, CP22C, San Diego, California, 92123. I received a
5 Bachelors of Science degree in Natural Resources, with a specialization in Forester and
6 Watershed Management, from Humboldt State University in 1995.

7 I am a Certified Arborist and Utilities Specialist as recognized by the International
8 Society of Arboriculture (“ISA”). I have been employed by SDG&E since September 2004. In
9 my current capacity, I am responsible for the day-to-day operations of our Department’s tree
10 pruning and pre-inspection activities throughout SDG&E’s service territory. I supervise four
11 SDG&E Area Foresters in their management of our tree pruning and pre-inspection contractors.
12 Prior to my current position, I served as Southern Area Forester and Pre-inspection Supervisor
13 for the Department. Prior to my employment with SDG&E, I worked for Pacific Gas and Electric
14 for approximately ten years in various capacities in its Vegetation Management Department,
15 including Pre-inspector, Supervisor, Auditor and Forester.

16 I have previously prepared testimony submitted to the California Public Utilities
17 Commission.

Exhibit 06

SDG&E Rebuttal Testimony of Tyson Swetek, dated January 8, 2021

Company: San Diego Gas & Electric Company (U 902-E)
Proceeding: 2019 Tree Trimming Balancing Account
Application: A.20-07-003
Exhibit: SDG&E-_____

SAN DIEGO GAS & ELECTRIC COMPANY
REBUTTAL TESTIMONY OF
TYSON SWETEK

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



JANUARY 8, 2021

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**REBUTTAL TESTIMONY OF
TYSON SWETEK
ON BEHALF OF SDG&E**

I. SUMMARY

My name is Tyson Swetek. I am the Director of Electric Distribution Operations at San Diego Gas & Electric (SDG&E). My qualifications are attached to this testimony as Section IV.

My testimony addresses the *Report on the Results of Operations for San Diego Gas & Electric Company Recovery of the 2019 Undercollected Balance Recorded in the Tree Trimming Balancing Account* (Report) prepared by Mr. Ryan Andresen of the Public Advocates Office at the California Public Utilities Commission (Cal Advocates). In the Report, Cal Advocates recommends recovery of \$6.3 million for San Diego Gas & Electric Company's (SDG&E's) undercollected operations and maintenance (O&M) costs recorded in SDG&E's Tree Trimming Balancing Account (TTBA). Cal Advocates' recommendation is \$4.1 million lower than SDG&E's \$10.4 million TTBA undercollection.

Cal Advocates alleges, amongst other things, that SDG&E's recovery should be reduced because SDG&E did not include adequate evidence or data demonstrating that its expanded 25-foot tree clearance from distribution facilities in the High Fire Threat District (HFTD) reduces wildfire risk. Contrary to Cal Advocates' claim, however, SDG&E has provided clear, empirical, quantitative analysis that demonstrates the wildfire risk reduction benefits of enhanced clearances. SDG&E should thus be authorized to recover related costs recorded in its TTBA and requested in its application, as they are critical to the safe and reliable operation of SDG&E's electric distribution system and the safety of SDG&E's customers. Put another way, a Commission decision that SDG&E's enhanced clearance costs are unreasonable and unrecoverable could send the signal that the Commission does not support vegetation management activities designed to mitigate and prevent the risk of wildfires.

1 **II. SDG&E’S ENHANCED VEGETATION MANAGEMENT PROGRAM**

2 SDG&E presented its Enhanced Vegetation Management (EVM) Program, including the
3 goal of achieving increased 25-foot post-trim tree clearances for trees in certain locations, in its
4 2019 Wildfire Mitigation Plan (WMP) in Rulemaking (R.) 18-10-007.¹ SDG&E established this
5 program with the goal to further reduce vegetation contacts by increasing post-trim clearances,
6 with a specific focus on five of the highest risk tree species in the HFTD, wherever possible.²
7 SDG&E’s 2019 WMP received Commission approval in Decision (D.) 19-05-039.³ In approving
8 the 2019 WMP, the Commission found that “SDG&E may implement a 25-foot post-trim
9 clearance where necessary and feasible if such a practice is supported by scientific evidence or
10 other data showing that such clearance will reduce risk under wildfire conditions.”⁴

11 SDG&E limited the scope of the EVM program, and specifically the 25-foot clearance, to
12 instances where it would have the biggest impact on reducing risk.⁵ These limitations reduced
13 the scope of the enhanced clearance from the over 400,000 trees within SDG&E’s entire tree
14 inventory, to approximately 80,000 trees, or 20%.⁶ SDG&E has continued to update the
15 Commission and Wildfire Safety Division (WSD) – which now oversees WMP activities – on its
16 EVM program, and data supporting the program, in various submissions, including its WMP

¹ See SDG&E Response to PUBADV-SDG&E-DR-003-RYD at q.1(f).

² *Id.* at q.1.

³ The purpose of Wildfire Mitigation Plan submissions is not to address cost recovery and the reasonableness of such costs. That is the purpose of this Application.

⁴ D.19-05-039, Ordering Paragraph 5 at 29-30.

⁵ SDG&E Response to PUBADV-SDG&E-DR-003-RYD at q.1(i).

⁶ *Id.*

1 quarterly updates, one of which included the submission of a comprehensive study to
2 demonstrate the efficacy of post-trim clearances based on SDG&E’s historical data.⁷

3 In the Report, Cal Advocates claims that SDG&E did not provide adequate evidence or
4 data to demonstrate that expanding to a 25-foot clearance for distribution facilities reduces
5 wildfire risk. On page 8 lines 14 through 22 of the Report, Cal Advocates quickly dismisses the
6 evidence and data SDG&E has provided—both to Cal Advocates’ data requests as well as to the
7 Commission and WSD in its WMP quarterly reports—to demonstrate that increasing clearances
8 reduces vegetation contacts. But the extensive data provided fully justifies the enhanced
9 clearances.

10 As noted, SDG&E made the decision to increase post-trim clearances within the HFTD
11 with the goal of reducing vegetation contacts that both can and have historically led to ignitions
12 and catastrophic wildfires in San Diego County and the state of California. This decision was
13 based on historical success SDG&E has experienced when increasing post-trim clearances, and
14 an outstanding performance record on its transmission vegetation contacts (less than one contact
15 per year on average in the last five years) where 20-30 feet of clearance is maintained. SDG&E
16 initially proposed an expansion of minimal clearance requirements to 10-12 feet in R.08-11-005,
17 which examined revisions and clarifications to the Commission’s regulations relating to the
18 safety of electric utility and communications infrastructure provider facilities (specifically
19 General Order 95, Rule 35).⁸ Following the devastating California fires in 2017 and 2018,
20 SDG&E began to consider ways to further improve its existing vegetation management program

⁷ See San Diego Gas & Electric Company Quarterly Report on 2020 Wildfire Mitigation Plan for Q3 2020 (September 9, 2020) (SDG&E’s 2020 WMP Q3 Report), Section III.L at 125-129, attached as Appendix B.

⁸ See SDG&E Response to PUBADV-SDG&E-DR-003-RYD at q.1(f).

1 by increasing its post-trim clearances.⁹ SDG&E finalized the scope of the 25-foot program in
2 March 2019 and began performing the work in April 2019.¹⁰

3 In the Report, Cal Advocates inaccurately claims SDG&E did not provide data to support
4 increasing clearances reduces wildfire risk. In response, SDG&E pointed to the times in history
5 where increasing vegetation clearances beyond regulatory minimum requirements led to
6 dramatic reductions in vegetation contacts and therefore wildfire risk, highlighting data to
7 support the logic behind the decision to seek greater clearances. The chart on page 10 of the
8 Report, Cal Advocates demonstrates the value of increased post-trim clearances and the logic
9 behind SDG&E's premise that greater clearances will lead to less vegetation contacts. The chart
10 specifically demonstrates how increasing the post-trim clearance from six inches to 10 feet
11 reduced tree-related outages from an average of approximately 400 per year (1995-1998), to
12 approximately 80 per year (1999-2010).¹¹ Additional refinements to the program, including
13 slightly increased clearances for fast-growing species such as eucalyptus and palm, resulted in an
14 additional reduction in average contacts from 80 per year (1999-2010) to about 40 per year
15 (2011-2019). In its 2017 revision to General Order 95, Rule 35, which increased post-trim
16 clearance recommendations for trees adjacent to distribution lines from 6 feet to 12 feet, the
17 Commission appears to agree with SDG&E that increasing post-trim clearances in the HFTD is a
18 best practice worth following.¹² SDG&E has maintained a 10-12 foot standard clearance
19 throughout its system since 1999.

⁹ *Id.*

¹⁰ *Id.* at q.1(g).

¹¹ *Id.* at q.1(i).

¹² *See* General Order 95, Rule 35, and Appendix E.

1 While the historical data demonstrates that SDG&E’s expectation that increasing
2 clearances would have some measurable impact on reducing vegetation contacts was reasonable,
3 the data obtained since implementing the EVM program provides further support for the
4 programs’ efficacy. At the time the Commission approved the Wildfire Safety Division’s
5 Resolution WSD-005,¹³ SDG&E had not yet provided sufficient evidence that increasing
6 clearances from their current standard of 10-12 feet to the new enhanced clearances of 20-30 feet
7 actually reduced vegetation contacts. As the Commission noted, this made it “difficult to
8 determine the effectiveness of this measure.” However, the purpose of Wildfire Mitigation Plan
9 submissions is not to provide cost recovery and the reasonableness of such costs. That is the
10 purpose of this Application. Further, SDG&E remedied this issue in SDG&E’s 2020 WMP
11 Third Report.¹⁴ Not only does this report clearly identify the impacts, it calculates the average
12 reduction in vegetation contacts per year by the end of the program utilizing the measured
13 difference in vegetation contact rates at the different post-trim clearance levels.¹⁵

14 While WSD recently found that an SDG&E Remedial Compliance Plan regarding its
15 2020 WMP did not sufficiently address the data requirements,¹⁶ WSD has not yet responded to
16 SDG&E’s 2020 WMP Q3 Report (which SDG&E submitted subsequent to the Remedial
17 Compliance Plan), and the division instructed SDG&E to further address this issue in its 2021
18 WMP Update. In any event, neither the Commission nor the WSD has ever found that

¹³ Resolution WSD-005 (June 11, 2020) at 38.

¹⁴ SDG&E’s 2020 WMP Q3 Report, Section III.L at 125-129, and Appendix B.

¹⁵ While Cal Advocates also received SDG&E’s 2020 WMP Q3 Report, SDG&E also provided (contrary to Cal Advocates’ allegations in its Report) similarly extensive data analysis supporting the EVM program and the conclusion that “as post-trim clearance distance increases, vegetation contact decreases.” *See* SDG&E Response to PUBADV-SDG&E-DR-003-RYD at q.1(k).

¹⁶ *See* Wildfire Safety Division Evaluation of San Diego Gas & Electric Company’s Remedial Compliance Plan (December 30, 2020).

1 SDG&E's enhanced vegetation clearance activities were unreasonable or that they should be
2 stopped or adjusted – nor should they. The data demonstrates that enhanced vegetation
3 clearances reduce the likelihood of vegetation powerline contact, which has all too frequently
4 been the source of catastrophic wildfires in California in the past few years. Mr. Andresen
5 dismisses the extensive analysis provided in SDG&E's 2020 WMP Q3 Report and SDG&E data
6 request responses that clearly, empirically, and quantitatively demonstrates the benefits of
7 increasing clearances from SDG&E's required standard of 10-12 feet to 20-25 feet in the HFTD,
8 for the subset of species that have historically caused the greatest amount of vegetation contacts
9 on SDG&E's electric system in one sentence.¹⁷

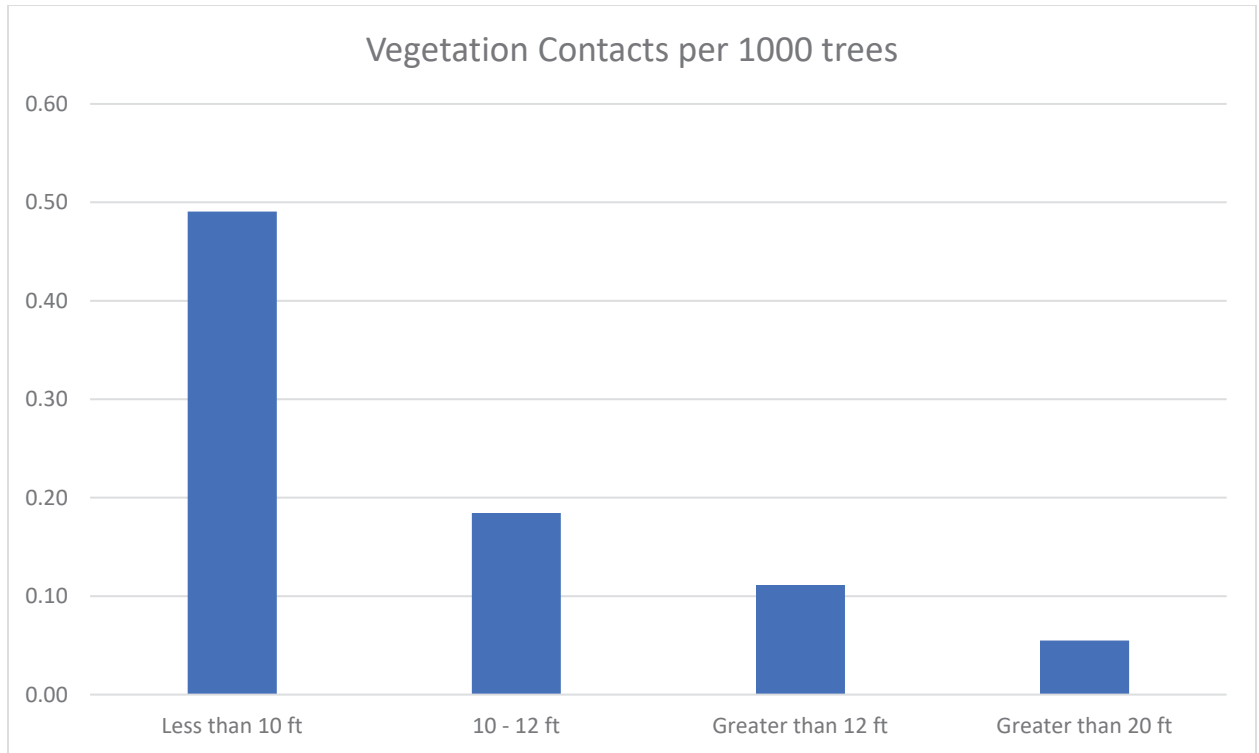
10 Cal Advocates then provides Table 2-5 as alleged evidence that SDG&E's enhanced
11 clearance program has failed to reduce vegetation contacts. But there are a number of flaws with
12 Mr. Andresen's analysis that have led Cal Advocates to draw the wrong conclusions:

- 13 1. In Table 2-5, Cal Advocates questions the reasonableness of the EVM
14 program by demonstrating that trees which were historically trimmed to
15 20-30 foot clearance do not correlate with overall reductions in vegetation
16 contacts. While the table goes back to 2010, SDG&E's enhanced
17 clearance program began in 2019. The trees trimmed before 2019 were
18 already being maintained to this clearance level. In general, these trees
19 were not being trimmed from a lower clearance level to a higher clearance
20 level, they were already located 20-30 feet from the distribution line and
21 were receiving routine maintenance trims. Because the EVM program
22 began in 2019, the benefits of the program would not have been expected
23 to be realized until 2020 and would not be fully realized until all 80,000
24 trees identified were completed.

¹⁷ Report at 8 (emphasis added).

- 1 2. The data set for Table 2-5 includes all vegetation contacts. Enhanced
2 post-trim clearance is a mitigation designed to reduce vegetation contacts
3 from trees blowing into the lines, growing into lines, or trees shedding
4 branches that then fall/glide into the distribution lines. Trimming a tree to
5 nearly any clearance will not prevent vegetation contact from a tree being
6 uprooted in a storm and falling into a line. SDG&E’s analysis in its 2020
7 WMP Q3 Report appropriately truncates the dataset to remove vegetation
8 contacts caused by uprooted trees. SDG&E has a hazard tree program
9 specifically designed to mitigate that type of vegetation contact.
- 10 3. Cal Advocates analysis provides no normalization or context with its data.
11 10,000 trees trimmed in 2019 may seem like a lot, but SDG&E completed
12 203,000 trims in 2019. When SDG&E moved from 8,000 trees in 2018 to
13 10,000 trees in 2019 at the enhanced clearance levels, that 30% increase
14 represents less than 1% of all trims in SDG&E service territory. And
15 again, while 50 contacts occurred in 2019, *zero of them occurred at the*
16 *20-30 foot clearance level*, again highlighting how the analysis in Table 2-
17 5 is misleading without appropriate context. SDG&E’s analysis in its
18 2020 WMP Q3 Report, however, is fair because the data is presented in
19 context. SDG&E could have selected data from its analysis to support a
20 conclusion that from 2010 through 2019, SDG&E has averaged just 0.5
21 vegetation contacts per year on trees trimmed to enhanced levels, While it
22 might be true, such an analysis would be similarly misleading because it
23 failed to take into account the volume of trees in the inventory. A fair
24 analysis should consider the contacts that occur, normalized by the
25 opportunity for the contacts to occur, which is exactly what SDG&E does
26 in its 2020 WMP Q3 Report.

27 Below is the summary table provided in SDG&E’s 2020 WMP Q3 Report that
28 demonstrates through measured average contact rates the reduction in contacts as post-trim
29 clearances are achieved.



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By expanding clearances from SDG&E’s standard of 10-12 feet to the enhanced clearance levels for identified species, annual contacts rates move from 0.18 per thousand trees to 0.05 per thousand trees, a significant reduction. SDG&E encourages the Commission to review SDG&E’s data and analysis on post-trim vegetation clearance provided in its 2020 WMP Q3 Report in assessing the merits of the EVM program and whether it meets SDG&E’s WMP requirements.

III. CONCLUSION

SDG&E has provided the Commission with clear, empirical, quantitative analysis that demonstrates the wildfire risk reduction benefits of enhanced clearances, as required by D.19-05-039. SDG&E should be authorized to recover expenses incurred by this program, as wildfire risk reduction benefits are critical to the safe and reliable operation of the SDG&E’s electric distribution system and the safety of SDG&E’s customers in the communities served.

This concludes my rebuttal testimony.

1 **IV. QUALIFICATIONS**

2 My name is Tyson Swetek. My business address is 8316 Century Park Court, San Diego,
3 California, 92123. I am employed by SDG&E as the Director of Electric Distribution
4 Operations. I have been employed by SDG&E since 2004 and have over 15 years of experience
5 in the utility industry. While with SDG&E, I have held various positions of increasing
6 responsibility in the functional areas of Wildfire Mitigation, Transmission Engineering,
7 Substation Construction and Maintenance, Distribution Construction and Maintenance, and
8 Distribution Operations.

9 My current responsibilities include Electric Distribution Operations and the Enterprise
10 Geographic Information Systems (GIS) services workgroup. Before starting my current position,
11 I was the Wildfire Mitigation Program Manager where, among other things, I oversaw the
12 development and implementation of SDG&E's WMP. Prior to that, I was the Manager of
13 Transmission Engineering, leading the group responsible for the design and project management
14 of SDG&E's capital transmission projects. I have also worked as the Operations and
15 Engineering Manager at SDG&E's Substation Construction and Maintenance group where I was
16 responsible for capital construction and substation inspection and maintenance. Prior to that, I
17 was the Operations and Engineering manager at one of SDG&E's district field offices in charge
18 of engineering, operations, and maintenance tasks.

19 I earned a Bachelor of Science degree in Electrical Engineering from California
20 Polytechnic State University and a Master of Business Administration degree from San Diego
21 State University. I am a registered Professional Engineer (PE) in California.

22 I have not testified previously to this Commission.
23
24

APPENDIX A

General Order 95

Appendix E

Clearance of Poles, Towers and Structures from Railroad Tracks

The following are guidelines to [Rule 35](#) .

The radial clearances shown below are recommended minimum clearances that should be established, at time of trimming, between the vegetation and the energized conductors and associated live parts where practicable. Reasonable vegetation management practices may make it advantageous for the purposes of public safety or service reliability to obtain greater clearances than those listed below to ensure compliance until the next scheduled maintenance. Each utility may determine and apply additional appropriate clearances beyond clearances listed below, which take into consideration various factors, including: line operating voltage, length of span, line sag, planned maintenance cycles, location of vegetation within the span, species type, experience with particular species, vegetation growth rate and characteristics, vegetation management standards and best practices, local climate, elevation, fire risk, and vegetation trimming requirements that are applicable to State Responsibility Area lands pursuant to Public Resource Code Sections 4102 and 4293.

Voltage of Lines	Case 13 of Table 1	Case 14 of Table 1
Radial clearances for any conductor of a line operating at 2,400 or more volts, but less than 72,000 volt	4 feet	12 feet
Radial clearances for any conductor of a line operating at 72,000 or more volts, but less than 110,000 volts	6 feet	20 feet
Radial clearances for any conductor of a line operating at 110,000 or more volts but less than 300,000 volts	10 feet	30 feet
Radial clearance for any conductor of a line operating at 300,000 or more volts	15 feet	30 feet

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Appendix B

L. Update on Condition SDGE-13: Lack of Risk Reduction or Other Supporting Data for Increased Time-or-Trim Clearances

As described in its 2020 WMP Remedial Compliance Plan, SDG&E's plan to measure the performance of enhanced clearances involved trimming trees to the enhanced clearance level, and then measuring the reliability performance of the electric system near those trees before and after the trimming. And while that will measure the effectiveness of this program on a going forward basis, SDG&E does have trees in the system that are trimmed to 20 – 30' clearance and was able to develop a study to measure the impacts of post trim clearance on vegetation contacts and ultimately ignitions.

To begin the study, SDG&E queried the vegetation database for outages caused by individual trees that had a post trim clearance associated with the tree at the time of the outage. At the outset, SDG&E's original goal was to utilize 20 years of data (2000 through 2019), but the data set was incomplete for years 2000 and 2001. While SDG&E has recorded vegetation contacts since 1995, SDG&E started recording outages for specific trees in its vegetation management database starting in the year 2000. There were some process issues in recording the data in the early years, however as this table demonstrates. Accordingly, SDG&E truncated the data set to 2002 – 2019.

**SDGE-13 Table 21
Vegetation Contacts**

	Contacts with post trim clearance	All Outages	% Trees with a trim
2000	4	42	9.5%
2001	21	64	32.8%
2002	46	102	45.1%
2003	58	113	51.3%
2004	37	72	51.4%
2005	32	70	45.7%
2006	62	79	78.5%
2007	43	71	60.6%
2008	52	107	48.6%
2009	40	78	51.3%
2010	55	130	42.3%
2011	18	29	62.1%
2012	25	39	64.1%
2013	21	29	72.4%
2014	36	48	75.0%
2015	21	28	75.0%
2016	39	65	60.0%
2017	38	70	54.3%
2018	30	36	83.3%
2019	21	31	67.7%
Total	699	1303	53.6%

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The study concept involved measuring the amount of historical contacts from trees that had been in SDG&E’s tree inventory and trimmed to a certain measured line clearance by SDG&E certified arborists. As this study is focused on the impact that trimming trees to a certain clearance has on vegetation contacts, contacts from trees that were not in inventory (had never been trimmed) or contacts from fall in trees were excluded from this data set. Below is a table containing the vegetation contact data.

**SDGE-13 Table 22
Outages by Post Trim Clearance**

Outages by Post Trim Clearance											
Year	2.1 to 4.0 ft	4.1 to 5.9 ft	6.0 to 7.9 ft	8.0 to 9.9 ft	10.0 to 11.9 ft	12.0 to 14.9 ft	15.0 to 19.9 ft	20.0 to 30.0 ft	30.1 to 40.0 ft	40.1 to 50.0 ft	50.1 - 60.0 ft
2002	2	8	1	19	15						
2003	0	6	4	20	26						
2004	0	1	3	6	26						
2005	0	1	3	4	24						
2006	0	0	3	4	54	0	0	0			
2007	1	0	3	1	37	1	0	0			
2008	1	1	2	3	41	2	0	1			
2009	0	3	1	0	32	2	1	1			
2010	0	1	2	2	45	0	3	2			
2011	0	0	0	0	17	0	1	0			
2012	0	0	0	0	22	3	0	0			
2013	1	0	0	0	15	2	0	1			
2014	0	2	0	2	26	3	1	1			
2015	2	1	0	0	18	0	0	0	0	0	0
2016	0	0	0	1	32	3	3	1	0	0	0
2017	0	1	1	1	33	2	1	0	0	0	0
2018	0	0	1	0	26	1	2	0	0	0	0
2019	0	0	2	0	17	2	0	0	0	0	0
Average contacts per year	0.4	1.4	1.4	3.5	28.1	1.5	0.9	0.5	0.0	0.0	0.0

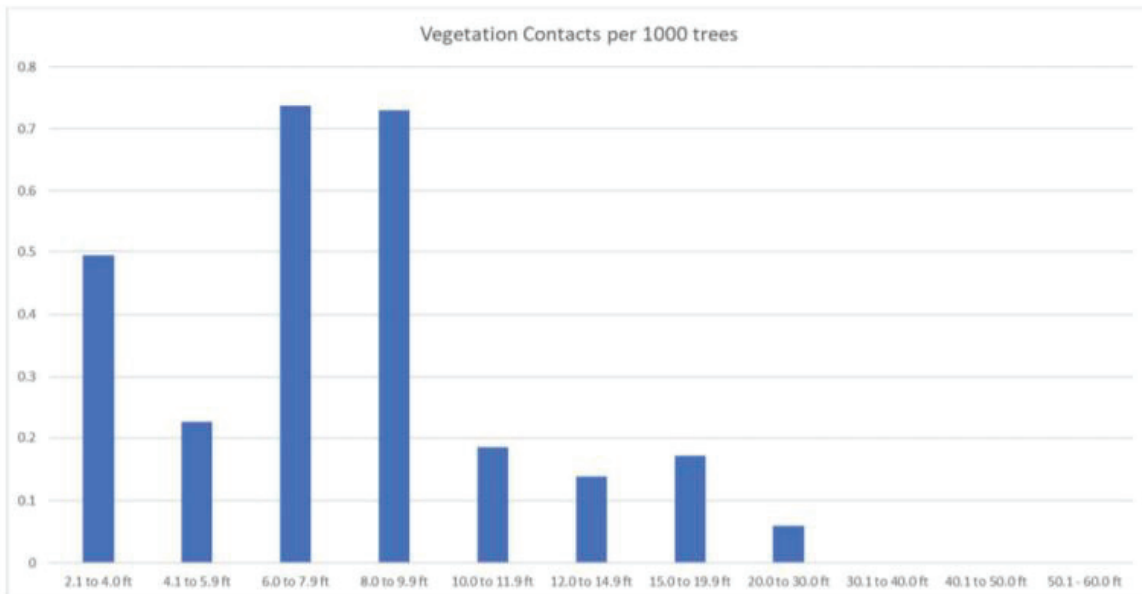
The next part of the study involved understanding the total tree exposure at these same post trim clearance levels so that a vegetation contact rate could be calculated. Ideally, SDG&E would have the entire tree inventory at the end of each year as a snapshot, by post trim clearance, but SDG&E did not record the data in that way. The best available data is the number of trees trimmed in a particular year to a post trim clearance level, which is the best proxy for inventory in this way because even though SDG&E does not trim every tree in the inventory every year, the number of trims are proportional to the inventory levels. Below is a chart showing the number of trims to post trim clearance levels by year.

**SDGE-13 Table 23
Trees Trimmed to Clearance Levels**

Year	Trees Trimmed to Clearance Levels										
	2.1 to 4.0 ft	4.1 to 5.9 ft	6.0 to 7.9 ft	8.0 to 9.9 ft	10.0 to 11.9 ft	12.0 to 14.9 ft	15.0 to 19.9 ft	20.0 to 30.0 ft	30.1 to 40.0 ft	40.1 to 50.0	50.1 - 60.0
2002	910	4898	7787	27024	146098						
2003	768	5643	5254	16409	124730						
2004	359	9170	2787	3012	208161						
2005	329	5288	1922	2010	129322						
2006	430	5197	2052	2338	134801	6651	2222	2242			
2007	398	4708	1258	1627	121886	5545	1916	3203			
2008	403	5452	938	870	119608	2653	2952	6236			
2009	411	6630	872	820	140447	4902	3743	8183			
2010	173	6141	675	708	136307	5325	2747	8181			
2011	149	5779	714	664	144950	13106	2838	7489			
2012	175	5716	531	581	154370	9629	3177	6671			
2013	183	5568	414	398	148557	7716	3385	6099			
2014	1005	7368	1144	3697	203175	14008	6690	8025	2575	201	135
2015	1843	6285	1336	5031	193353	12925	7095	10457	2235	152	42
2016	1327	7311	1542	5080	191138	18308	9008	13770	3621	316	89
2017	1264	6125	1496	3459	145121	14955	7401	9854	2058	238	144
2018	1809	7148	1839	5488	164436	15922	7238	13359	2251	615	174
2019	2229	6484	2701	7067	136322	20096	9808	15154	2664	486	155
Average	787	6162	1955	4794	152376	10839	5016	8495	2567	335	123

SDG&E then divided average vegetation contacts per year at a clearance level by the trees trimmed at clearance level to determine the contact rate. As these numbers are small, SDG&E normalized the data by reporting the contact rate per 1,000 trees. Below is the resulting chart.

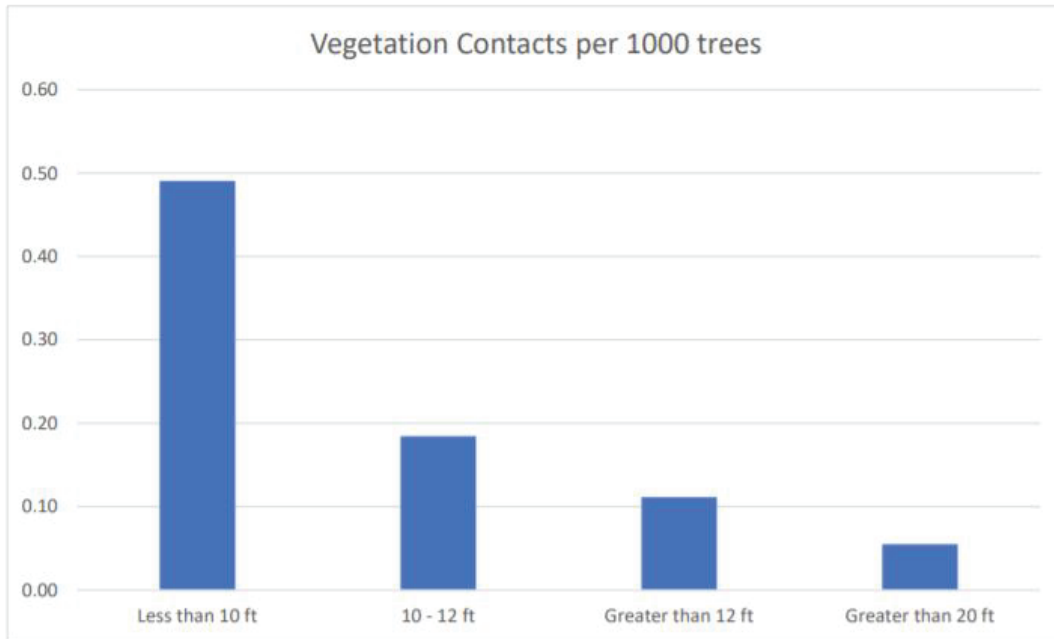
**SDGE-13 Figure 16
Vegetation Contacts per 1,000 Trees**



As shown by the chart, there is a relationship between post trim clearance and contact rates. As post trim clearance increases, the contact rates go down. To further illustrate this conclusion, SDG&E grouped the data into four categories. These groupings follow the same methodology described above. Set forth below are the results of the grouped data. SDG&E

maintained the 10 – 12’ trim level as an individual category because the majority of trees in SDG&E’s inventory are trimmed to this level.

**SDGE-13 Figure 17
Vegetation Contacts per 1,000 Trees – By Group**



This data demonstrates that increased post trim clearances decreases vegetation contacts are valid. It also demonstrates that stakeholder concerns regarding diminishing returns are valid too. Going from less than 10’ to 10’ - 12’ represents a .31 vegetation contact per 1000 trees reduction, while going from 12’ to greater than 20’ represents a .13 vegetation contact reduction per 1000 tree reduction. In fact, SDG&E would estimate that going from less than 10’ to 10 -12’ has an even greater impact than this data demonstrates, as SDG&E has already completed most of the trims to get its inventory to this level prior to 2002. The trees that remain at less than 10’ remain so because SDG&E’s arborist inspections determined that these specific trees were safe at these levels.

Nevertheless, even with diminishing returns, trimming to 20’ represents a 58% reduction in contact rate. For practical purposes, SDG&E’s program has targeted 80,000 trees within the HFTD for this greater level of clearance. $80,000 * .13 / 1000 = 10.4$ vegetation contacts reduced annually. Given that SDG&E currently averages 40 vegetation contacts per year, this would represent a 25% reduction in both vegetation contacts and ignition risk. While this risk

reduction is less than what SDG&E had originally estimated, based on SDG&E's current average cost per trim, this program remains risk spend efficient.

In addition to the information presented on the study, SDG&E would like to clarify the scope of the enhanced vegetation management program. The enhanced vegetation management program is targeting greater clearances on specific high-risk species (described in SDG&E-14 below), that are located in the HFTD. When SDG&E discusses achieving enhanced clearances up to 25' where feasible, it is talking about the high-risk tree species that have tree canopies located above the adjacent power lines, a radial clearance from 0-180 degrees versus 0 – 360 degrees. SDG&E is not trying to achieve a 25' radial clearance from all vegetation including native plants, grasses, shrubs, or trees that are located below the power lines. SDG&E maintains compliant clearances on trees that grow under power lines to ensure a grow in does not occur, but there is no need to increase clearances on these trees, because they are not at risk of shedding branches in wind events that could blow into the power lines. SDG&E agrees that native plants and vegetation can actually help slow the spread of fires and has no intention of clear cutting native vegetation below its power lines, its only objective is to trim back or remove trees with canopies located above the power lines that have the potential shed branches that could contact the power lines and result in a potential ignition.

Exhibit 07

Data Request (DR):PubAdv-SDG&E-001-RYD, dated July 22, 2020



Public Advocates Office
California Public Utilities Commission

505 Van Ness Avenue
San Francisco, CA 94102

<http://publicadvocates.cpuc.ca.gov>

DATA REQUEST
San Diego Gas & Electric Company Tree Trimming Balancing Account
A.20-07-003

Origination Date: 22 July 2020

Responses Due: 05 August 2020

To: Norma G. Jasso, njasso@semprautilities.com
Laura M. Fulton, lfulton@sdge.com

From: Tamera Godfrey, Project Coordinator
Public Advocates Office
505 Van Ness Avenue, Room 4104
San Francisco, CA 94102 tlg@cpuc.ca.gov

Originated by: Ryan Andresen
Phone: 415-703-3089
Email: Ryan.Andresen@cpuc.ca.gov

Data Request No: PubAdv-SDG&E-001-RYD

1. Referring to Exhibit SDG&E-02, Attachment A of the Application of SDG&E for Recovery of Undercollection Recorded in the Tree Trimming Balancing Account, SDG&E requests recovery of the 2019 undercollected balance of \$10,420,644 in the Tree Trimming Balancing Account (TTBA).

In an Excel spreadsheet, provide the line item detail that specifically identifies each recorded cost associated with the programs and activities recorded in the TTBA for each year in 2015-2019 broken down by labor and non-labor (for example, contracts, programs/projects, audits, pre-inspections, etc.).

2. The following refer to Exhibit SDG&E-01:
 - a. On page 8 lines 2-4, the tree-trim scope was increased to a 25-foot clearance in the HFTD where feasible. Provide documentation that explains in detail and demonstrates the amount SDG&E spends per tree to expand clearances to 25 feet.
 - b. Provide documentation that demonstrates the breakdown of the cost per tree based on tree species.
 - c. If the tree species does not impact the cost per tree, please still provide the breakdown of cost per tree in the HFTD and non-HFTD.

3. On page 8, lines 12-13, SDG&E asserts the removal of hazard trees is a primary driver of TTBA cost increases.
 - a. Provide documentation that explains in detail if the number of hazard trees removed in 2019 was higher than the hazard trees removed during 2015-2018.
 - b. Provide the number of hazard trees removed, the number of hazard trees identified, and the number of hazard trees trimmed each year in 2015-2019 and the recorded costs for each activity.
 - c. Provide the average cost per hazard tree removal in each year from 2015-2019.
4. On page 10, lines 14-16, SDG&E asserts there are increased costs due to approximately 1000 customer refusal resolution efforts.
 - a. Provide documentation that explains in detail if during 2014-2018, there were more customer refusals recorded then there were in 2019.
 - b. Provide the number of customer refusals in each year from 2015-2019.
 - c. Provide documentation that explains if customer refusals offer a cost saving or increases costs when SDG&E is unable to perform the work originally forecasted.
 - d. Provide documentation that demonstrates the calculations for costs associated with customer refusals and the recorded adjustments associated with this activity for 2014-2019.
5. On page 10, lines 17-18, SDG&E asserts enhanced vegetation management programs have resulted in increased biomass and recycling costs. Provide documentation that demonstrates the breakdown of biomass, recycling, and composting costs associated with tree removal in each year from 2014-2019.
6. On page 11, lines 13-14, SDG&E enacted a complete line patrol and 100% audit of all hazard and reliability tree work in the HFTD. Provide documentation that demonstrates the costs incurred for this activity.
7. Provide documentation that explains if during 2014-2018, SDG&E enacted a complete line patrol and 100% audit of all hazard and reliability tree work in the HFTD. If no, please explain why not. If yes, please provide a spreadsheet breaking down the costs of these audits in each year they occurred from 2014-2019.
8. On page 11, lines 21-22, SDG&E asserts wildfire plans by other utilities and increased mitigation statewide led to higher labor costs associated with vegetation management in 2019.

Provide documentation that supports SDG&E's assertion and demonstrates specifically that wildfire cost increases were driven by work volume at the same time SDG&E was hiring outsourced crews, including total vegetation management labor costs for each year in 2014-2019. In the response provide an itemized breakdown of each recorded labor cost (for example, audits, trimming, removal, inspections, etc.) in each of these years.
9. On page 12, lines 7-8, please provide the line item detail of each cost in the reported approximately \$60,000 per week cost of outsourced crews. How much did SDG&E spend on outsourced crews in 2014-2018?
10. On page 12, lines 17-18, provide documentation that explains specifically what SDG&E includes in its list of "exigent conditions."

11. Provide documentation that explains if the number of “exigent conditions” were greater in 2019 than in 2014-2018. If not, please explain why this is a driver of higher costs in 2019.
12. In an Excel spreadsheet, provide the line item detail that specifically identifies each recorded cost associated with SDG&E employee and contractor costs incurred for lunches, entertainment, lodging and other employee reimbursable costs recorded in the TTBA for each year in 2014-2019, including the number of employees, date, location, and vendor.

END OF REQUEST

INSTRUCTIONS

You are instructed to answer the Data Requests in the above-captioned proceeding, with written, verified responses pursuant to Public Utilities Code §§ 309.5, 314, 314.5, 581 and 582, and Rules 1.1 and 10.1 of the California Public Utilities Commission’s Rules of Practice and Procedure. Restate the text of each request prior to providing the response. If you have any questions regarding this data request, please contact the Originator at the email address or phone number above.

Each Data Request is continuing in nature such that if any information provided changes, or new information becomes available that is responsive to a request, respondent is required to supplement its response to the Public Advocates Office. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Originator and Project Coordinator(s) as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. All data responses need to have each page numbered, referenced, and indexed so worksheets can be followed. If any numbers are calculated, include a copy of all supporting electronic files, with data and formulas intact and functioning, so that the formula and their sources can be reviewed. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word or Excel format, send the Word document or Excel file and do not send the information only as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible.

Documents produced in response to the data requests should be numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by page numbers.

If a request, definition, or an instruction, is unclear, notify the data request Originator and the Project Coordinator(s) as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Provide two copies of the above information as it becomes available but no later than the due date identified above. Provide electronic responses and set of hard copy responses with your submittal to the data request Originator and the Project Coordinator(s).

Exhibit 08

DR: July 22, 2020 Email requesting workpapers

Jasso, Norma G

From: Godfrey, Tamera <tamera.godfrey@cpuc.ca.gov>
Sent: Wednesday, July 22, 2020 1:46 PM
To: Jasso, Norma G; Fulton, Laura M
Cc: Andresen, Ryan
Subject: [EXTERNAL] A.20-07-003, SDG&E Tree Trimming Balancing Account Workpapers

Follow Up Flag: Follow up
Flag Status: Flagged

*** EXTERNAL EMAIL - Be cautious of attachments, web links, and requests for information ***

Norma,

Please provide SDG&E's workpapers prepared in support of its application for the undercollected balance recorded in its Tree Trimming Balancing Account. Thank you.

Tamera Godfrey

Public Advocates Office/CPUC

tamera.godfrey@cpuc.ca.gov

505 Van Ness Avenue, San Francisco, CA 94102

415-703-1367



This email originated outside of Sempra Energy. Be cautious of attachments, web links, or requests for information.

Exhibit 09

SDG&E DR responses. Dated July 27, 2020 email stating no workpapers; August 19, 2020 (Q. 1, 3-12); August 21, 2020 (Q.2); October 2, 2020 (Supplemental Responses)

Jasso, Norma G

From: Godfrey, Tamera <tamera.godfrey@cpuc.ca.gov>
Sent: Monday, July 27, 2020 9:08 PM
To: Jasso, Norma G; Fulton, Laura M
Cc: Andresen, Ryan
Subject: [EXTERNAL] RE: A.20-07-003, Public Advocates Office Tree Trimming Balancing Account data request PubAdv-SDG&E-001-RYD

*** EXTERNAL EMAIL - Be cautious of attachments, web links, and requests for information ***

Norma,

Thank you for the response regarding SDG&E's workpapers. Please keep me posted regarding completed responses.

Tamera

From: Jasso, Norma G <NJasso@semprautilities.com>
Sent: Monday, July 27, 2020 8:43 PM
To: Godfrey, Tamera <tamera.godfrey@cpuc.ca.gov>; Fulton, Laura M <LFulton@sdge.com>
Cc: Andresen, Ryan <Ryan.Andresen@cpuc.ca.gov>
Subject: RE: A.20-07-003, Public Advocates Office Tree Trimming Balancing Account data request PubAdv-SDG&E-001-RYD

Tamera,

Thank you for the two week extension for our response to DR#1. We're agreeable to providing responses sooner, as they become available.

SDG&E did not prepare workpapers with respect to the TTBA schedule that is provided as Attachment A to Claire Olegario's testimony. The monthly journal entries to record costs in the TTBA are compiled through the use of the company's SAP accounting system so that data requires a good amount of accounting codes translations. The TTBA schedule is a summary of activity recorded in the accounting system. The detail for those accounting entries will be provided in response to DR#1, Question #1.

Regards,
Norma G Jasso

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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.
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create documents that do not currently exist.

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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

Referring to Exhibit SDG&E-02, Attachment A of the Application of SDG&E for Recovery of Undercollection Recorded in the Tree Trimming Balancing Account, SDG&E requests recovery of the 2019 undercollected balance of \$10,420,644 in the Tree Trimming Balancing Account (TTBA).

In an Excel spreadsheet, provide the line item detail that specifically identifies each recorded cost associated with the programs and activities recorded in the TTBA for each year in 2015-2019 broken down by labor and non-labor (for example, contracts, programs/projects, audits, pre-inspections, etc.).

SDG&E Response: 01

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 3, 5, and 9. Subject to the foregoing objections, SDG&E replies as follows:

Please see the attached excel file titled “2019 TTBA O&M by categoryDR1Q1.xlsx”

The excel file shows the total 2019 O&M activity broken down by category and by period. To view further line item details for expenses, please double click on the specific cell and a separate tab within the excel file will generate providing individual line item detail that makes up the total.

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Question 2

The following refer to Exhibit SDG&E-01:

- a. On page 8 lines 2-4, the tree-trim scope was increased to a 25-foot clearance in the HFTD where feasible. Provide documentation that explains in detail and demonstrates the amount SDG&E spends per tree to expand clearances to 25 feet.
- b. Provide documentation that demonstrates the breakdown of the cost per tree based on tree species.
- c. If the tree species does not impact the cost per tree, please still provide the breakdown of cost per tree in the HFTD and non-HFTD.

SDG&E Response: 02

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

SDG&E continues to compile this information and anticipates providing a response to this question by August 21, 2020.

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Question 3

On page 8, lines 12-13, SDG&E asserts the removal of hazard trees is a primary driver of TTBA cost increases.

- a. Provide documentation that explains in detail if the number of hazard trees removed in 2019 was higher than the hazard trees removed during 2015-2018.
- b. Provide the number of hazard trees removed, the number of hazard trees identified, and the number of hazard trees trimmed each year in 2015-2019 and the recorded costs for each activity.
- c. Provide the average cost per hazard tree removal in each year from 2015-2019.

SDG&E Response: 03

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

Hazard trees as described in the 2019 SDG&E WMP are trees tall enough to strike overhead lines in the event of a whole tree failure or limb break. Tree hazards include dead or dying trees, dead parts of live trees, or unstable live trees (due to structural defects or other factors) that are within striking distance of overhead electrical facilities (a target). Hazard trees have the potential to cause property damage, personal injury or fatality in the event of a failure.

- a. The total number of hazard trees removed in 2019 was slightly higher than the number of hazard trees removed in 2018. However, the number of hazard trees trimmed in 2019 was substantially higher than 2018.
- b. The table below provides the number of trees inspected, trimmed, and removed in years 2018 and 2019.

Hazard Trees	2018	2019
Inspected	15,361	20,995
Trimmed	11,863	18,369
Removed	491	509

- c. The average cost per hazard tree removal 2018 was \$666.45.
The average cost per hazard tree removal 2019 was \$810.59.

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Question 4

On page 10, lines 14-16, SDG&E asserts there are increased costs due to approximately 1000 customer refusal resolution efforts.

- a. Provide documentation that explains in detail if during 2014-2018, there were more customer refusals recorded then there were in 2019.
- b. Provide the number of customer refusals in each year from 2015-2019.
- c. Provide documentation that explains if customer refusals offer a cost saving or increases costs when SDG&E is unable to perform the work originally forecasted.
- d. Provide documentation that demonstrates the calculations for costs associated with customer refusals and the recorded adjustments associated with this activity for 2014-2019.

SDG&E Response: 04

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

- a. Customer refusals increased in 2019 primarily as a result in the increased scope and volume of work associated with “reliability” or hazard tree work. This scope increase included trees where greater clearances were pursued than had previously been achieved. The table below provides the total number of refusals in 2019 vs. 2018.

Refusals	2018	2019
Properties	782	826

- b. See a. above
- c. Customer refusals may initially present a cost savings since the work is not being completed and billed. The cost for mitigating a refusal can vary greatly depending on how much time, effort and resources are required to resolve. For example, the refusal process may require the involvement of multiple parties at the contractor level and by internal SDG&E staff. If a refusal becomes protracted and unresolved SDG&E Legal and/or law enforcement may be engaged. SDG&E does not track specific metrics to quantify the actual cost of a refusal. Once a refusal is resolved, the work generally proceeds.
- d. Calculations for cost associated with customer refusals vary and may include: the amount of time and associated cost a contractor spends trying to resolve a refusal, administrative costs for processing certified letters to document refusal, lost production time for the tree contractors, and incremental time needed for the tree

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contractor to return to a refusal property. SDG&E does not track and record specific costs, or the costs associated with specific customer refusals.

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Question 5

On page 10, lines 17-18, SDG&E asserts enhanced vegetation management programs have resulted in increased biomass and recycling costs. Provide documentation that demonstrates the breakdown of biomass, recycling, and composting costs associated with tree removal in each year from 2014-2019.

SDG&E Response: 05

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

The table below represents the total annual tonnage of green waste diverted to biomass landfill and recycle facilities in years 2018 and 2019, and the associated costs. SDG&E does not track and quantify volume and costs of biomass individually between trimming and removal.

Biomass/Landfill	Tonnage	Cost
2018	7962.13	\$209,198
2019	5706.12	\$277,927

Recycle/Compost	Tonnage	Cost
2018	3,536.48	\$159,489
2019	3,564.43	\$149,998

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Question 6

On page 11, lines 13-14, SDG&E enacted a complete line patrol and 100% audit of all hazard and reliability tree work in the HFTD. Provide documentation that demonstrates the costs incurred for this activity.

SDG&E Response: 06

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

In 2019 SDG&E incorporated a “level-2” line patrol to be performed during the post-trim audit activity within the HFTD. This patrol included a detailed inspection of all trees within the utility strike zone to assess for hazards. The table below provides the estimated total hours and costs to complete the off-cycle line patrol in conjunction with the audit activity within the HFTD based on available data.

Total hours to complete	Hourly audit rate	Total
2856	\$69.19	\$197,607

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Question 7

Provide documentation that explains if during 2014-2018, SDG&E enacted a complete line patrol and 100% audit of all hazard and reliability tree work in the HFTD. If no, please explain why not. If yes, please provide a spreadsheet breaking down the costs of these audits in each year they occurred from 2014-2019.

SDG&E Response: 07

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

In 2018 SDG&E performed a line patrol in conjunction with the audit activity within the HFTD. This patrol involved a cursory look at the lines to determine whether any trees may require pruning prior to the next routinely-scheduled pre-inspection activity. In 2019 SDG&E performed an enhanced level-2 inspection. Prior to 2019, audit patrols did not include a detailed, level-2 inspection. Prior to 2019, SDG&E did not track separately the costs associated with the line patrol and the audit activity.

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Question 8

On page 11, lines 21-22, SDG&E asserts wildfire plans by other utilities and increased mitigation statewide led to higher labor costs associated with vegetation management in 2019.

Provide documentation that supports SDG&E’s assertion and demonstrates specifically that wildfire cost increases were driven by work volume at the same time SDG&E was hiring outsourced crews, including total vegetation management labor costs for each year in 2014-2019. In the response provide an itemized breakdown of each recorded labor cost (for example, audits, trimming, removal, inspections, etc.) in each of these years.

SDG&E Response: 08

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

Please see the attached excel file titled
“2019 vs 2018 comparison tree trimming expensesDR1Q8.xlsx”

The excel file shows a comparison of 2018 and 2019 expenses related to tree trimming work. To view further line item details for expenses, please double click on the particular cell and a separate tab within the excel file will generate providing each individual line item that makes up the total.

SDG&E pre-inspection identified a higher volume of hazard work in 2019 vs 2018. The table below lists the increase in volume of work in 2019 vs. 2018. Recorded cost can be found above in Question 1 attached excel file “2019 TTBA O&M by categoryDR1Q1.xlsx”

Hazard Trees	2018	2019
Inspected	15361	20995
Trimmed	11863	18369
Removed	491	509

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Question 9

On page 12, lines 7-8, please provide the line item detail of each cost in the reported approximately \$60,000 per week cost of outsourced crews. How much did SDG&E spend on outsourced crews in 2014-2018?

SDG&E Response: 09

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

In 2019, SDG&E requested its tree contractors to increase available workforce to manage the increased volume of tree work. At that time local crews were not available which required the need to onboard outsourced tree crews. SDG&E tree trim contractors did not utilize outside crew resources prior to 2019.

The table below provides the number of two-man crews and weekly labor costs for outsourced crews.

2019 ESTIMATED WEEKLY COST SUMMARY			
40HRS ST AND 10 OT		Crew Count	Weekly Cost
2-Man Lift Crew:	\$7,336.10	5	\$36,680.50
2-Man Extended Lift Crew:	\$7,513.60	3	\$22,540.80
Total:		8	\$59,221.30

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Question 10

On page 12, lines 17-18, provide documentation that explains specifically what SDG&E includes in its list of “exigent conditions.”

SDG&E Response: 10

SDG&E objects to this request on the grounds set forth in General Objections Nos. 3 and 8. Subject to the foregoing objections, SDG&E responds as follows:

Exigent conditions exist when normal, routine tree operations are disrupted due to circumstances such as extreme weather conditions, including high heat events, wind, and winter storms. Generally these unplanned events are primarily associated with elevated fire concern. Specifically, these are Red Flag Warning events and/or SDG&E-defined extreme fire potential conditions during which most activities cease. During such events tree crews are often staged at the SDG&E operational districts in advance of an event for emergency dispatch and in preparation for electric restoration activities. This results in substantial downtime for the tree crews and the delay of routine-scheduled tree operations.

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Question 11

Provide documentation that explains if the number of “exigent conditions” were greater in 2019 than in 2014-2018. If not, please explain why this is a driver of higher costs in 2019.

SDG&E Response: 11

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

SDG&E experienced ten (10) Red Flag Warning days each year in 2018 and 2019. Extreme fire danger during these events effectively shut down tree operations within the HFTD, with the exception of emergency work perceived as necessary prevent an outage or ignition. The same work restraints apply during days where the SDG&E Fire Potential Index (FPI) is rated as Extreme. SDG&E experienced eleven (11) days of Extreme FPI in 2018 and nine (9) days of Extreme FPI in 2019. Any emergency trimming work performed during these extreme conditions must be performed with professional fire resources on standby. The downtime and loss of production during these events generally increases subsequent costs because when routine tree work recommences, additional overtime and weekend resources may be required to complete delayed work. Higher contractual costs and the onboarding costs associated with the addition of outsourced crews contributed to increased costs associated with these conditions in 2019 over 2018.

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Question 12

In an Excel spreadsheet, provide the line item detail that specifically identifies each recorded cost associated with SDG&E employee and contractor costs incurred for lunches, entertainment, lodging and other employee reimbursable costs recorded in the TTBA for each year in 2014-2019, including the number of employees, date, location, and vendor.

SDG&E Response: 12

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

Please see attached spreadsheet titled, “PubAdv_DR_001_RYD_Q12.xlsx” for costs associated with lodging and per diem for additional, outsourced tree crews in 2019.

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create documents that do not currently exist.

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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.
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4. These responses are made solely for the purpose of this proceeding and for no other purpose.

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PUBADV-SDG&E-DR-001-RYD
SDG&E TREE TRIMMING – A.20-07-003
SDG&E RESPONSE
DATE RECEIVED: JULY 22, 2020
DATE RESPONDED: AUGUST 21, 2020**

III. RESPONSES

Question 2

The following refer to Exhibit SDG&E-01:

- a. On page 8 lines 2-4, the tree-trim scope was increased to a 25-foot clearance in the HFTD where feasible. Provide documentation that explains in detail and demonstrates the amount SDG&E spends per tree to expand clearances to 25 feet.
- b. Provide documentation that demonstrates the breakdown of the cost per tree based on tree species.
- c. If the tree species does not impact the cost per tree, please still provide the breakdown of cost per tree in the HFTD and non-HFTD.

SDG&E Response: 02

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

- a. Each tree contractor negotiates a unit-cost (fixed pricing) and Time & Materials (hourly) cost. Rates are determined by a variety of factors including: complexity of work, traffic control, specialized equipment, etc. Long term contracts also provide a benefit to leverage annual lower rate increase for the term of contracts. In 2019, the average unit cost for a routine tree trim was approximately \$75. SDG&E also has a unit cost rate for trimming that entails more canopy reduction to mitigate hazardous conditions and may entail the use of specialized equipment. SDG&E refers to such tree/work as “Reliability.” In 2019, the average unit cost for Reliability work was approximately \$535. The trees that SDG&E trims to the expanded 25-foot clearance may be performed at the routine trim rate, the Reliability rate, or an hourly rate. The hourly rate is generally much higher than the fixed unit rates. Based on the trim and reliability trim data, SDG&E estimates the cost in the following table:

2019 Expanded Clearance (20-25 feet)				
Routine Trim Units	Reliability Trim Units	\$Cost Routine	\$Cost Reliability	Total Cost
11,215	3,939	\$841,125	\$2,107,365	\$2,948,490

- b. SDG&E does not have a specific cost or rate based on the tree species. The rates are based on the work type such as trim or removal and the complexity of the work.

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- c. SDG&E does not have a specific cost or rate based on the location of the tree. All species share the same rate regardless of location.

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DATE RESPONDED: OCTOBER 2, 2020

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.
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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

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create documents that do not currently exist.

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.
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DATE RECEIVED: JULY 22, 2020
DATE RESPONDED: OCTOBER 2, 2020**

III. RESPONSES

Question 1

Referring to Exhibit SDG&E-02, Attachment A of the Application of SDG&E for Recovery of Undercollection Recorded in the Tree Trimming Balancing Account, SDG&E requests recovery of the 2019 undercollected balance of \$10,420,644 in the Tree Trimming Balancing Account (TTBA).

In an Excel spreadsheet, provide the line item detail that specifically identifies each recorded cost associated with the programs and activities recorded in the TTBA for each year in 2015-2019 broken down by labor and non-labor (for example, contracts, programs/projects, audits, pre-inspections, etc.).

SDG&E Response: 01 Supplement

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 3, 5, and 9. Subject to the foregoing objections, SDG&E replies as follows:

Please see attached excel file titled “2017 - 2019 TTBA O&M by categoryDR1Q1 - Supplemental.xlsx”

The excel file shows the total 2017, 2018 and 2019 O&M activity broken down by category and by period. To view further line item details for expenses, please double click on the specific cell and a separate tab within the excel file will generate providing individual line item detail that makes up the total.

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DATE RECEIVED: JULY 22, 2020
DATE RESPONDED: OCTOBER 2, 2020**

Question 3

On page 8, lines 12-13, SDG&E asserts the removal of hazard trees is a primary driver of TTBA cost increases.

- a. Provide documentation that explains in detail if the number of hazard trees removed in 2019 was higher than the hazard trees removed during 2015-2018.
- b. Provide the number of hazard trees removed, the number of hazard trees identified, and the number of hazard trees trimmed each year in 2015-2019 and the recorded costs for each activity.
- c. Provide the average cost per hazard tree removal in each year from 2015-2019.

SDG&E Response: 03 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

- a. The table below provides the number of hazard trees inspected, trimmed, and removed in years 2017, 2018 and 2019.

Hazard Trees	2017	2018	2019
Inspected	6,875	15,361	20,995
Trimmed	8,497	11,863	18,369
Removed	540	491	509

- b. The average cost per hazard tree removal 2017 was \$639.94
The average cost per hazard tree removal 2018 was \$666.45.
The average cost per hazard tree removal 2019 was \$810.59.

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Question 4

On page 10, lines 14-16, SDG&E asserts there are increased costs due to approximately 1000 customer refusal resolution efforts.

- a. Provide documentation that explains in detail if during 2014-2018, there were more customer refusals recorded then there were in 2019.
- b. Provide the number of customer refusals in each year from 2015-2019.
- c. Provide documentation that explains if customer refusals offer a cost saving or increases costs when SDG&E is unable to perform the work originally forecasted.
- d. Provide documentation that demonstrates the calculations for costs associated with customer refusals and the recorded adjustments associated with this activity for 2014-2019.

SDG&E Response: 04 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

- a. Customer refusals increased in 2019 primarily as a result in the increased scope and volume of work associated with “reliability” or hazard tree work. This scope increase included trees where greater clearances were pursued than had previously been achieved. The table below provides the total number of refusals in 2017, 2018 and 2019.

Refusals	2017	2018	2019
Properties	528	874	922

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DATE RECEIVED: JULY 22, 2020
DATE RESPONDED: OCTOBER 2, 2020**

Question 5

On page 10, lines 17-18, SDG&E asserts enhanced vegetation management programs have resulted in increased biomass and recycling costs. Provide documentation that demonstrates the breakdown of biomass, recycling, and composting costs associated with tree removal in each year from 2014-2019.

SDG&E Response: 05 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

The table below represents the total annual tonnage of green waste diverted to biomass landfill and recycle facilities in years 2017, 2018 and 2019, and the associated costs. SDG&E does not track and quantify volume and costs of biomass individually between trimming and removal.

Biomass/Landfill	Tonnage	Cost
2017	5,755.87	\$239,003
2018	7962.13	\$209,198
2019	5706.12	\$277,927

Recycle/Compost	Tonnage	Cost
2017	2,759.34	\$121,693
2018	3,536.48	\$159,489
2019	3,564.43	\$149,998

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Question 7

Provide documentation that explains if during 2014-2018, SDG&E enacted a complete line patrol and 100% audit of all hazard and reliability tree work in the HFTD. If no, please explain why not. If yes, please provide a spreadsheet breaking down the costs of these audits in each year they occurred from 2014-2019.

SDG&E Response: 07 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

In 2018 and 2017 SDG&E performed a line patrol in conjunction with the audit activity within the HFTD. This patrol involved a cursory look at the lines to determine whether any trees may require pruning prior to the next routinely-scheduled pre-inspection activity. In 2019 SDG&E performed an enhanced level-2 inspection. Prior to 2019, audit patrols did not include a detailed, level-2 inspection. Prior to 2019, SDG&E did not track separately the costs associated with the line patrol and the audit activity.

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Question 8

On page 11, lines 21-22, SDG&E asserts wildfire plans by other utilities and increased mitigation statewide led to higher labor costs associated with vegetation management in 2019.

Provide documentation that supports SDG&E’s assertion and demonstrates specifically that wildfire cost increases were driven by work volume at the same time SDG&E was hiring outsourced crews, including total vegetation management labor costs for each year in 2014-2019. In the response provide an itemized breakdown of each recorded labor cost (for example, audits, trimming, removal, inspections, etc.) in each of these years.

SDG&E Response: 08 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

Please see the attached excel file titled
“2019 vs 2018 vs 2017 comparison tree trimming expensesDR1Q8 - Supplemental.xlsx”

The excel file shows a comparison of 2017, 2018 and 2019 expenses related to tree trimming work. To view further line item details for expenses, please double click on the particular cell and a separate tab within the excel file will generate providing each individual line item that makes up the total.

The table below provides a comparison of the volume of work in 2019 vs. 2017-2018. Though the total number of trees trimmed was less in 2019 vs 2018 the total overall costs in 2019 were higher due to several factors including: higher contractual rates, higher proportion of hazard trees trimmed and removed, increased number of tree crews, and the incorporation of outsourced crews and associated expenses. Additionally, the total number of trees removed in 2019 was markedly higher than in 2018. Refer to Question 1 Supplement response, above, for recorded cost.

Trees Worked	2017	2018	2019
Inspected	455,250	457,800	453,330
Trimmed	155,785	175,990	161,915
Removed	7189	8105	9008

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DATE RECEIVED: JULY 22, 2020
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Question 9

On page 12, lines 7-8, please provide the line item detail of each cost in the reported approximately \$60,000 per week cost of outsourced crews. How much did SDG&E spend on outsourced crews in 2014-2018?

SDG&E Response: 09 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

SDG&E tree trim contractors did not utilize outside crew resources prior to 2019.

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Question 11

Provide documentation that explains if the number of “exigent conditions” were greater in 2019 than in 2014-2018. If not, please explain why this is a driver of higher costs in 2019.

SDG&E Response: 11 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

SDG&E experienced twenty-two (22) Red Flag Warning (RFW) days in 2017, and ten (10) RFW days each in years 2018 and 2019. Extreme fire danger during these events effectively shut down tree operations within the HFTD, with the exception of emergency work perceived as necessary to prevent an outage or ignition. The same work restraints apply during days where the SDG&E Fire Potential Index (FPI) is rated as Extreme. SDG&E experienced sixteen (16) Extreme FPI days in 2017, eleven (11) days of Extreme FPI in 2018, and nine (9) days of Extreme FPI in 2019. Any emergency trimming work performed during these extreme conditions must be performed with professional fire resources on standby. The downtime and loss of production during these events generally increases subsequent costs because when routine tree work recommences, additional overtime and weekend resources may be required to complete delayed work. Higher contractual costs and the onboarding costs associated with the addition of outsourced crews contributed to increased costs associated with these conditions in 2019 over 2018.

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DATE RECEIVED: JULY 22, 2020
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Question 12

In an Excel spreadsheet, provide the line item detail that specifically identifies each recorded cost associated with SDG&E employee and contractor costs incurred for lunches, entertainment, lodging and other employee reimbursable costs recorded in the TTBA for each year in 2014-2019, including the number of employees, date, location, and vendor.

SDG&E Response: 12 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

Please see attached spreadsheet titled, “PubAdv_DR_001_RYD_Q12.xlsx” for costs associated with lodging and per diem for additional, outsourced tree crews in 2019.

SDG&E did not use contractors prior to 2019.....

Exhibit 10

DR: PubAdv-SDG&E-003-RYD, dated August 7, 2020



Public Advocates Office
California Public Utilities Commission

505 Van Ness Avenue
San Francisco, CA 94102

<http://publicadvocates.cpuc.ca.gov>

DATA REQUEST
San Diego Gas & Electric Company Tree Trimming Balancing Account
A.20-07-003

Origination Date: 7 August 2020

Responses Due: 21 August 2020

To: Norma G. Jasso, njasso@semprautilities.com
Laura M. Fulton, lfulton@sdge.com

From: Tamera Godfrey, Project Coordinator
Public Advocates Office
505 Van Ness Avenue, Room 4104
San Francisco, CA 94102 tlg@cpuc.ca.gov

Originated by: Ryan Andresen
Phone: 415-703-3089
Email: Ryan.Andresen@cpuc.ca.gov

Data Request No: PubAdv-SDG&E-003-RYD
Exhibit Reference: SDG&E-01

SDG&E Witness: Don Akau
Subject: Tree Trimming Balancing Account (TTBA)

The following refer to SDG&E's testimony, Exhibit SDG&E-01:

1. Referring to p. 5, lines 21-22, SDG&E asserts, "SDG&E now aims to prune identified tree species to a 25-foot clearance within the HFTD. The new clearance is a substantial increase from previously implemented practices."
 - a. Provide documentation that shows the detailed breakdown of the calculation of costs (years 2014-2019) that is associated with the "substantial increase from previously implement practices."
 - b. Provide documentation that demonstrates SDG&E's established guidelines on how SDG&E identifies tree species to prune to a 25-foot clearance.
 - c. Provide documentation that explains in detail if SDG&E considers other factors than tree species when determining whether a certain tree will be pruned to a 25-foot clearance.

- d. Provide SDG&E's established guidelines that specifically determines whether a certain tree will be pruned to a 25-foot clearance.
 - e. Provide documentation SDG&E's management prepared and relied upon, prior to this data request, that demonstrates the scientific evidence or other data showing that increasing the clearance to 25-feet will reduce wildfire risk.
 - f. Provide documentation that shows the specific dates SDG&E performed and prepared the scientific evidence or other data associated with its 25-foot clearance program.
 - g. Provide documentation that demonstrates specifically when SDG&E implemented its 25-foot clearance program, the specific date SDG&E started performing the work and the costs directly associated with this program.
 - h. Provide documentation that explains and demonstrates if during 2014-2018 SDG&E incurred costs and performed 25-foot clearance activities. If so, provide the recorded cost for the activity for each year.
 - i. Provide documentation SDG&E's management prepared and relied upon that demonstrates that increasing the clearance to 25-feet provides incremental risk reduction benefits. In the response include documentation identifying the incremental risk and that shows the calculation on the reduction benefits.
 - j. Provide SDG&E's established guidelines utilized for determining which wildfire risk reduction measure (for example, expanding clearances, undergrounding) to implement.
 - k. Provide documentation that SDG&E's management prepared, prior to this data request, and relied upon, that demonstrates the results of the effectiveness of expanding clearances to 25-feet in 2019.
 - l. Provide documentation that shows the specific details and demonstrates exactly how SDG&E measures the impact of increasing clearances to 25-feet on the probability of ignitions and outages.
2. Referring to p. 1 of SDG&E's Application, it was directed to file an application for recovery of the undercollected balance exceeded 35% of its authorized revenue requirement of \$24.2 million. In an Excel spreadsheet, provide the line item detail and related costs for activities recorded in SDG&E's TTBA for 2015-2019.
 3. Referring to p. 8, lines 4-8, SDG&E asserts, "The 25-foot clearance expanded beyond legal and regulatory requirements and particularly targeted high-risk, fast-growth species in the HFTD, such as eucalyptus, pine, oak and sycamore. Both trees that could grow within the 25-foot clearance of the power line or, alternatively, blow into the clearance area, were coded for trimming where feasible."
 - a. Provide documentation that demonstrates specifically when SDG&E's 25-foot clearance program that "expanded beyond legal and regulatory requirements" was approved by the Commission.
 - b. Provide documentation that explains in detail if there were other tree species than those listed (eucalyptus, pine, oak, and sycamore) trimmed to 25 feet. Please list all tree species that were trimmed to 25 feet and the recorded cost for this activity.

- c. Provide documentation that demonstrates that each species trimmed to 25 feet specifically is high-risk and fast-growing.
- d. Provide documentation that explains in detail if SDG&E considers all trees in these high-risk, fast-growth species to be high-risk trees.
- e. Provide documentation that explains in detail what is meant by the condition “where feasible.” Provide SDG&E’s guidelines that determine whether a 25-foot trim is feasible.

END OF REQUEST

INSTRUCTIONS

You are instructed to answer the Data Requests in the above-captioned proceeding, with written, verified responses pursuant to Public Utilities Code §§ 309.5, 314, 314.5, 581 and 582, and Rules 1.1 and 10.1 of the California Public Utilities Commission’s Rules of Practice and Procedure. Restate the text of each request prior to providing the response. If you have any questions regarding this data request, please contact the Originator at the email address or phone number above.

Each Data Request is continuing in nature such that if any information provided changes, or new information becomes available that is responsive to a request, respondent is required to supplement its response to the Public Advocates Office. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Originator and Project Coordinator(s) as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. All data responses need to have each page numbered, referenced, and indexed so worksheets can be followed. If any numbers are calculated, include a copy of all supporting electronic files, with data and formulas intact and functioning, so that the formula and their sources can be reviewed. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word or Excel format, send the Word document or Excel file and do not send the information only as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible.

Documents produced in response to the data requests should be numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by page numbers.

If a request, definition, or an instruction, is unclear, notify the data request Originator and the Project Coordinator(s) as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Provide two copies of the above information as it becomes available but no later than the due date identified above. Provide electronic responses and set of hard copy responses with your submittal to the data request Originator and the Project Coordinator(s).

Exhibit 11

SDG&E DR responses dated August 21, 2020; Supplemental responses on October 2, 2020

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DATE RESPONDED: AUGUST 21, 2020

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create documents that do not currently exist.

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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.
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III. RESPONSES

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- a. Provide documentation that shows the detailed breakdown of the calculation of costs (years 2014-2019) that is associated with the “substantial increase from previously implement practices.”
- b. Provide documentation that demonstrates SDG&E’s established guidelines on how SDG&E identifies tree species to prune to a 25-foot clearance.
- c. Provide documentation that explains in detail if SDG&E considers other factors than tree species when determining whether a certain tree will be pruned to a 25-foot clearance.
- d. Provide SDG&E’s established guidelines that specifically determines whether a certain tree will be pruned to a 25-foot clearance.
- e. Provide documentation SDG&E’s management prepared and relied upon, prior to this data request, that demonstrates the scientific evidence or other data showing that increasing the clearance to 25-feet will reduce wildfire risk.
- f. Provide documentation that shows the specific dates SDG&E performed and prepared the scientific evidence or other data associated with its 25-foot clearance program.
- g. Provide documentation that demonstrates specifically when SDG&E implemented its 25-foot clearance program, the specific date SDG&E started performing the work and the costs directly associated with this program.
- h. Provide documentation that explains and demonstrates if during 2014-2018 SDG&E incurred costs and performed 25-foot clearance activities. If so, provide the recorded cost for the activity for each year.
- i. Provide documentation SDG&E’s management prepared and relied upon that demonstrates that increasing the clearance to 25-feet provides incremental risk reduction benefits. In the response include documentation identifying the incremental risk and that shows the calculation on the reduction benefits.

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- j. Provide SDG&E’s established guidelines utilized for determining which wildfire risk reduction measure (for example, expanding clearances, undergrounding) to implement.
- k. Provide documentation that SDG&E’s management prepared, prior to this data request, and relied upon, that demonstrates the results of the effectiveness of expanding clearances to 25-feet in 2019.
- l. Provide documentation that shows the specific details and demonstrates exactly how SDG&E measures the impact of increasing clearances to 25-feet on the probability of ignitions and outages.

SDG&E Response: 01

SDG&E objects to this request on the grounds set forth in General Objections Nos. 1, 2, 4, 5, 6, 7, and 9. Subject to the foregoing objections, SDG&E responds as follows:

a. SDG&E began implementing its enhanced 25-foot clearance program in 2019. As such, data from 2014-2018 related to this program does not exist. The table below provides the estimated calculation of costs that reflect the estimated cost of the expanded 25-foot clearance.

2019 Expanded Clearance	
Reliability Trim Units	\$Cost Reliability
3,939	\$2,107,365

b. SDG&E considers multiple factors in determining whether a tree will be pruned to a clearance of 25-feet. The two overarching considerations are the growth rate of the tree and whether the tree exhibits any reliability or hazard potential. For all trees inspected, if SDG&E determines a tree will not maintain the minimum clearance required for the annual cycle, the tree is listed to be trimmed. The tree contractor is instructed to prune to a clearance that will ensure the tree remains compliant for the cycle. This is not an arbitrary, pre-determined clearance. SDG&E evaluates a variety of factors to determine the appropriate clearance, including: growth, species, tree’s position relative to the lines, proper pruning practices, and potential movement of the tree and lines due to wind. Clearances up to and beyond 25-feet are applied where tree regrowth is very fast, where the proper cut requires it, and/or to completely abate an observed defect within the tree.

c. SDG&E does consider factors other than species when determining whether a tree will be pruned to a 25-foot clearance. A significant determinant is whether there are potential structural integrity issues observed in the tree that may indicate branch or trunk failure; for example, if the

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tree has included bark where two branches join at a narrow angle, or if previous cuts were made improperly where branch regrowth may be weakly attached. Other instances where the increased clearances may be implemented include trees that have an exceptionally fast-growth rate, and where tree canopies are subject to strong prevailing winds which can move it into the conductors.

d. Please see response Question 2(b) above.

e. Please see response to Question 2(i) below.

f. SDG&E initially proposed an expansion of the minimum clearance requirements to 10-12 feet in Rulemaking (R.) 08-11-005, which examined revisions and clarifications to the Commission’s regulations relating to the safety of electric utility and communications infrastructure provider facilities (specifically General Order (GO) 95, Rule 35). The justification and rationale for this proposed increase in clearance was supported by SDG&E’s analysis of its tree-related outage history. Following the devastating California fires in 2017 and 2018, SDG&E began to consider ways to further improve upon its existing vegetation management program. Specifically, SDG&E sought to further reduce vegetation contacts by increasing its post-trim clearances. The data SDG&E used to support that premise was previous vegetation contact history in relation to previous enhanced clearance initiatives, and the vegetation contact performance on its transmission system where greater clearances are obtained. This information is laid out in SDG&E’s response to Question 1(i) below. SDG&E presented its enhanced vegetation management program with the goal of the increased 25-foot post-trim clearance in its 2019 Wildfire Mitigation Plan (WMP) in R.18-10-007.

g. SDG&E finalized the scope of the 25-foot program in March 2019 and began performing the work in April 2019.

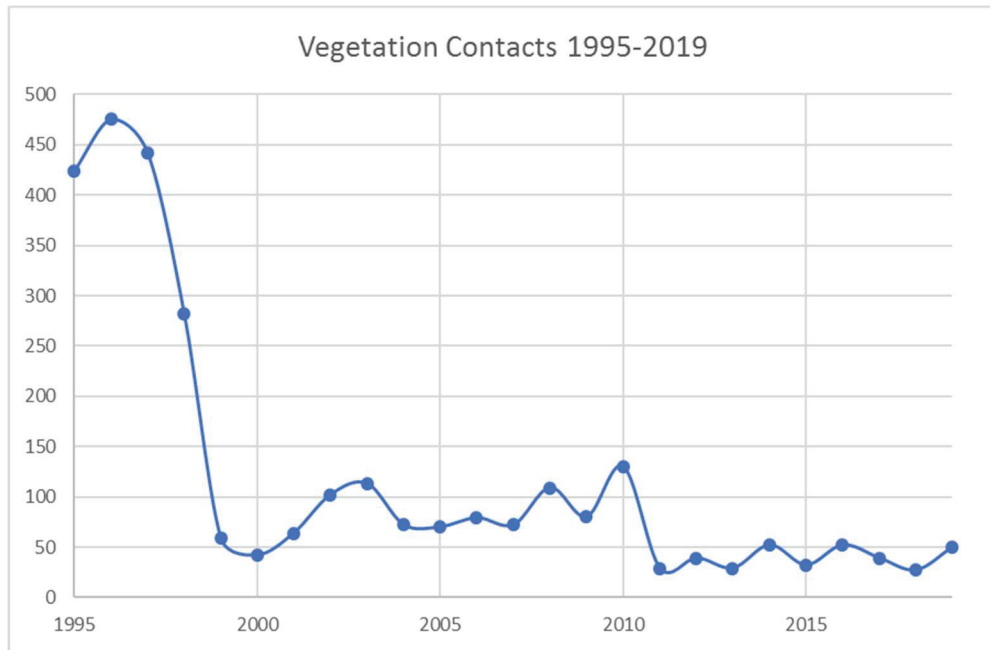
2019 Expanded Clearance (20-25 feet)				
Routine Trim Units	Reliability Trim Units	\$Cost Routine	\$Cost Reliability	Total Cost
11,215	3,939	\$841,125	\$2,107,365	\$2,948,490

h. SDG&E did not implement its current enhanced 25-foot program prior to 2019.

i. The following sets forth SDG&E’s history of decisions and the associated performance of its Vegetation Management Program, and explains SDG&E’s rationale to increase its post-trim vegetation clearance levels to 25’ in the high fire threat district (HFTD), for specific tree species.

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In 1996, California increased its vegetation clearance requirements from 6-inches to 18-inches. The regulations set forth in Commission GO 95, Rule 35 did not explicitly prohibit a company from maintaining greater clearances. Starting in 1999, SDG&E began to achieve and maintain a 10-12 foot post-trim clearance on all trees within its service territory. As depicted in the figure below, the reductions in vegetation contacts were dramatic.



Specifically, increasing the post-trim clearance from 6-inches to 10 feet reduced tree-related outages from an average of approximately 400 per year (1995-1998) to approximately 80 per year (1999-2010). During the 2008-2011 timeframe, SDG&E made two enhancements to its vegetation management program that resulted in a further material reduction in vegetation contacts. These included slightly increased post-trim clearance for high growth rate species including eucalyptus and palm (12-foot), as well as the requirement for off cycle patrols of bamboo and Century plants. The enhancements resulted in a reduction from approximately 80 contacts per year (1999-2010) to about 40 contacts per year (2011-2019). It should be noted that there were more winter storms in the years 1999-2010 than the following years 2011-2019, which also accounts for some of the improved performance.

In 2019, after the devastating California wildfires of 2017 and 2018, SDG&E looked for ways to further improve on its performance through a further reduction in vegetation contacts. SDG&E analyzed the vegetation contact performance on its transmission system, where a minimum of 25-foot post-trim clearance is already maintained. As

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shown in Table 11 of SDG&E’s 2020 WMP,¹ (and pasted below for ease of reference) vegetation contacts are nearly eliminated at this clearance level, averaging less than one contact per year (0.4 contacts/year). Understanding the impacts this type of clearance would have on customers, SDG&E explained in its 2019 WMP that it would increase its tree trim scope to achieve a 25-foot post-trim clearance within the HFTD where feasible (enhanced vegetation management).

TABLE 11b Transmission: Key Recent Drivers of Ignition Probability, Last 5 Years																				
Incident type by ignition probability driver	Contact from object	Near misses tracked	Number of Incidents per year					Avg % probability of ignition per incident					Ignition per year caused by driver							
			2015	2016	2017	2018	2019	Average	2015	2016	2017	2018	2019	Average	2015	2016	2017	2018	2019	Average
	All types of object contact	Yes	35	34	34	32	18	30.6	11.43%	2.94%	2.94%	15.63%	5.56%	7.84%	4	1	1	5	1	2.4
	Animal contact	Yes	15	5	7	1	6	6.8	20.00%	0.00%	0.00%	100.00%	0.00%	11.76%	3	0	0	1	0	0.8
	Balloon contact	Yes	17	24	24	26	10	20.2	5.88%	0.00%	4.17%	0.00%	10.00%	2.97%	1	0	1	0	1	0.6
	Veg. contact	Yes	1	1	0	0	0	0.4	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0	0	0	0	0	0
	Vehicle contact	Yes	1	3	1	4	1	2	0.00%	0.00%	0.00%	75.00%	0.00%	30.00%	0	0	0	3	0	0.6
	Other	Yes	1	1	2	1	1	1.2	0.00%	100.00%	0.00%	100.00%	0.00%	33.33%	0	1	0	1	0	0.4

SDG&E limited the scope of its enhanced vegetation management, and specifically the 25-foot clearance, to instances where it would have the biggest impact on reducing risk. This meant targeting the five highest risk species and only within the HFTD. These limitations reduced the scope of the enhanced clearance from the over 400,000 trees within the entire tree inventory, to only 80,000 trees or 20%.

j. SDG&E utilizes the concept of risk spend efficiency (RSE) to select its fire hardening mitigations. SDG&E estimated the risk reduction values of its core mitigations strategies using historical ignition data. SDG&E evaluated the ignition causes from an equipment and foreign object in lines, and then estimated how much each mitigation would successfully prevent that type of failure. It was forecasted that undergrounding would eliminate nearly 100% of the ignitions, covered conductor was estimated at 90%, and overhead hardening was estimated at 80%. Based on the cost per mile of these activities, bare overhead hardening is the most efficient risk reduction method and SDG&E’s historical hardening efforts reflect this, with SDG&E using this method to harden an average of 145 miles per year over the last 5 years (distribution and transmission) while doing very few miles of underground hardening during this time frame. Going forward, SDG&E is improving its risk modeling on multiple fronts. Specifically, SDG&E is utilizing more abundant reliability data in addition to ignition data to better measure the effectiveness of mitigations; traunching risk at the circuit segment level, which is in line with how SDG&E operates its system at during high risk events; and takes into account the impact of Public Safety Power Shutoff (PSPS) into its hardening analysis. As a result of these changes, SDG&E expects that the use of mitigations like covered conductor and undergrounding will increase, where covered conductor will be the primary mitigation due it being more risk spend efficient than underground, but undergrounding having a strategic use case in areas where there

¹ SDG&E 2020 WMP, Appendix A, Table 11.

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are significant benefits to customers or areas where the risk is so great that a strategy of maximizing risk reduction is more prudent than a strategy of maximizing risk spend efficiency. For the purpose of vegetation management, only undergrounding eliminates the need to perform vegetation management on the inventory trees associated with the hardened electrical assets.

k. Please see the response to Question 1(i) above. In addition to the analysis provided in response to Question 1(i) above, SDG&E has been preparing a study to further demonstrate the efficacy of post trim clearances based on SDG&E’s historical data and is planning to provide that study as part of SDG&E’s 2020 WMP Quarterly Report on September 9, 2020. The study is nearly complete and will be available on September 9. In a preliminary fashion, SDG&E can describe its analysis as follows.

To perform this data study, SDG&E ran two queries. The first was a query of SDG&E’s vegetation management database for outage data, filtered to only include tree IDs with outages associated with trees that had a trim date with a measured post trim clearance. Given the parameters described, outages from non-inventory trees (like fall-in trees) are not included in this study, or if an outage happened before a tree was trimmed, they are not included in this study as they would not have had an associated post trim date. Given those filters, SDG&E found the following outage data by post trim clearance as measured by the certified arborists who perform the trims.

Year	Outages by Post Trim Clearance								
	2.1 to 4.0 ft	4.1 to 5.9 ft	6.0 to 7.9 ft	8.0 to 9.9 ft	10.0 to 11.9 ft	12.0 to 14.9 ft	15.0 to 19.9 ft	20.0 to 30.0 ft	30.1 to 40.0 ft
2002	2	8	1	17	15	0	1	0	0
2003	0	6	3	20	26	1	0	0	0
2004	0	1	3	6	26	0	0	0	1
2005	0	1	3	4	24	0	0	0	0
2006	0	0	3	4	54	0	0	1	0
2007	1	0	3	1	37	1	0	0	0
2008	1	1	2	3	41	2	0	1	0
2009	0	3	1	0	32	2	1	1	0
2010	0	1	2	2	45	0	3	2	0
2011	0	0	0	0	17	0	1	0	0
2012	0	0	0	0	22	3	0	0	0
2013	1	0	0	0	15	2	0	1	0
2014	0	2	0	2	26	3	1	1	0
2015	2	1	0	0	18	0	0	0	0
2016	0	0	0	1	32	3	2	1	0
2017	0	1	1	1	33	1	1	0	0
2018	0	0	1	0	26	1	1	0	0
2019	0	0	2	0	17	1	0	0	0
Average Outage per year	0.4	1.4	1.4	3.4	28.1	1.1	0.6	0.4	0.1

The outage data by itself cannot measure the relative risk, as it only represents the outcome. The available exposure is also needed to calculate the outage rate. Ideally, SDG&E would have the entire tree inventory by post trim clearance for every historical year, however, SDG&E does not

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store the data in that way. The best approximation of tree inventory with the available data is to examine the total number of trees trimmed to those levels on an annual basis. The annual trims are proportional to the trees in inventory and represent a good denominator to use for the rate calculation. The following chart shows the number of trims per year to the post trim clearance value.

Year	Trees Trimmed to Clearance Levels								
	2.1 to 4.0 ft	4.1 to 5.9 ft	6.0 to 7.9 ft	8.0 to 9.9 ft	10.0 to 11.9 ft	12.0 to 14.9 ft	15.0 to 19.9 ft	20.0 to 30.0 ft	30.1 to 40.0 ft
2002	910	4898	7787	27024	146090	4950	2363	3894	2810
2003	768	5643	5254	16409	124730	4950	2363	3894	2810
2004	359	9170	2787	3012	208161	4950	2363	3894	2810
2005	329	5288	1922	2010	129322	4950	2363	3894	2810
2006	430	5197	2052	2338	134801	6651	2222	2242	2810
2007	398	4708	1258	1627	121886	5545	1916	3203	2810
2008	403	5452	938	870	119608	2653	2952	6236	2810
2009	411	6630	872	820	140447	4902	3743	8183	2810
2010	173	6141	675	708	136307	5325	2747	8181	2810
2011	149	5779	714	664	144950	13106	2838	7489	2810
2012	175	5716	531	581	154370	9629	3177	6671	2810
2013	183	5568	414	398	148557	7716	3385	6099	2810
2014	1005	7368	1144	3697	203175	14008	6690	8025	2575
2015	1843	6285	1336	5031	193353	12925	7095	10457	2235
2016	1327	7313	1542	5080	191139	18308	9008	13770	3621
2017	1264	6135	1496	3459	145121	14955	7401	9856	2058
2018	1809	7148	1839	5488	164436	15922	7238	13359	2251
2019	2229	6484	2701	7067	136322	20096	9808	15154	2664

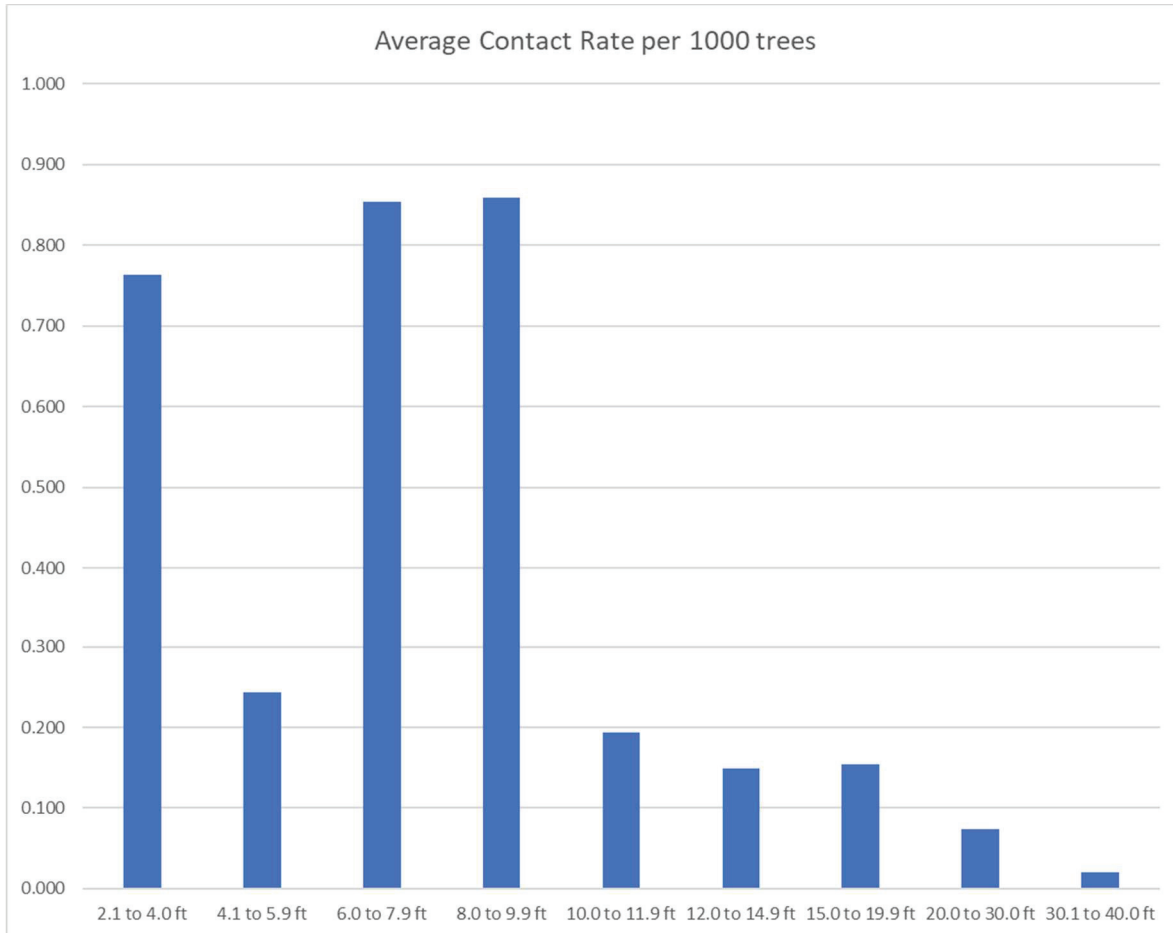
The data highlighted yellow represents data SDG&E did not track on the larger clearances in earlier years. Being that there were some contacts during those times, the amount of trims was estimated (extrapolated) based on the three year average of the earliest available data. With those two queries complete, SDG&E divided outages by trees trimmed to obtain the rates.

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Year	Contact Rate by clearance								
	2.1 to 4.0 ft	4.1 to 5.9 ft	6.0 to 7.9 ft	8.0 to 9.9 ft	10.0 to 11.9 ft	12.0 to 14.9 ft	15.0 to 19.9 ft	20.0 to 30.0 ft	30.1 to 40.0 ft
2002	0.0021978	0.00163332	0.00012842	0.00062907	0.000102676	0	0.000423191	0	0
2003	0	0.00106326	0.00057099	0.00121884	0.00020845	0.00020202	0	0	0
2004	0	0.00010905	0.00107643	0.00199203	0.000124903	0	0	0	0.000355872
2005	0	0.00018911	0.00156087	0.00199005	0.000185583	0	0	0	0
2006	0	0	0.00146199	0.00171086	0.000400591	0	0	0.00044603	0
2007	0.00251256	0	0.00238474	0.00061463	0.000303562	0.000180343	0	0	0
2008	0.00248139	0.00018342	0.0021322	0.00344828	0.000342786	0.000753864	0	0.000160359	0
2009	0	0.00045249	0.00114679	0	0.000227844	0.000407997	0.000267165	0.000122205	0
2010	0	0.00016284	0.00296296	0.00282486	0.000330137	0	0.0010921	0.000244469	0
2011	0	0	0	0	0.000117282	0	0.000352361	0	0
2012	0	0	0	0	0.000142515	0.000311559	0	0	0
2013	0.00546448	0	0	0	0.000100971	0.000259202	0	0.000163961	0
2014	0	0.00027144	0	0.00054098	0.000127969	0.000214163	0.000149477	0.000124611	0
2015	0.00108519	0.00015911	0	0	9.3094E-05	0	0	0	0
2016	0	0	0	0.00019685	0.000167417	0.000163863	0.000222025	7.26216E-05	0
2017	0	0.000163	0.00066845	0.0002891	0.000227396	6.68673E-05	0.000135117	0	0
2018	0	0	0.00054377	0	0.000158116	6.28062E-05	0.00013816	0	0
2019	0	0	0.00074047	0	0.000124705	4.97611E-05	0	0	0
Average Contact Rate	0.00076341	0.00024372	0.00085434	0.00085864	0.000193667	0.000148469	0.000154422	7.41254E-05	1.97707E-05
Average per 1000 trees	0.76341237	0.24372458	0.85433759	0.85864181	0.193666603	0.148469131	0.15442199	0.074125363	0.01977066

Since the contact rates were small, SDG&E normalized them by multiplying by 1,000, creating an average contact rate per 1,000 trees. SDG&E submits that the results clearly demonstrates that as post trim clearance distance increases, vegetation contact rates decreases.

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The data shows that the greatest benefit was achieved when SDG&E trimmed the majority of its inventory to the 10' – 12' level, going from contact rates above 0.8 to contact rates below 0.2. But the data further supports that there are still significant risk reduction benefits to be gained by increasing post-trim vegetation clearances. Going from a clearance of 10' – 12', where SDG&E has the majority of its tree inventory, to 20 – 30' reduces the contact rate from 0.194 contacts per 1,000 trees to a rate of 0.074 contacts per 1,000 trees, or a *62% reduction in risk*. A two tailed t-test of these two sample means confirms the reduction in risk from contact rates is statistically significant at an alpha of 0.05 or a 95% confidence level. As SDG&E continues to trim more trees to the 20' – 30' post-trim clearance level as part of its enhanced vegetation management program, SDG&E will refresh this study annually to continue to measure the results, and will report these updates in future WMPs and/or WMP quarterly reports.

1. As explained in the subparts above, SDG&E has established the historical vegetation contact rates at the respective post-trim clearance levels. To measure the impact on actual faults and ignitions, a few more calculations must be performed. Recall that SDG&E's enhanced

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vegetation management program targets 80,000 trees within the HFTD. Even if it was assumed that all those trees are currently at the 10-12' range where the majority of SDG&E's inventory exists (the results would be even better if some of those trees had less than 10' – 12' clearance), SDG&E estimates that those trees contribute to an average of 15.5 outages per year (80,000 x 0.194/1,000). Using SDG&E's current five-year average ignition, SDG&E estimates the ignition probability from vegetation contacts of 8.5%, that equals 1.32 ignitions per year. Once these 80,000 trees are converted to the enhanced clearance levels, SDG&E anticipates that the probabilities will reduce to 5.9 outages per year and 0.50 ignitions per year. The calculated risk reduction is the difference, or 9.6 less contacts per year and 0.82 ignitions less per year due to vegetation contacts as a direct result of the enhanced vegetation management program.

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Question 2

Referring to p. 1 of SDG&E's Application, it was directed to file an application for recovery of the undercollected balance exceeded 35% of its authorized revenue requirement of \$24.2 million. In an Excel spreadsheet, provide the line item detail and related costs for activities recorded in SDG&E's TTBA for 2015-2019.

SDG&E Response: 02

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 3, 5, 6, and 9. Subject to the foregoing objections, SDG&E replies as follows:

Please see response to PUBADV-SDG&E-DR-001-RYD, Question 1.

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Question 3

Referring to p. 8, lines 4-8, SDG&E asserts, “The 25-foot clearance expanded beyond legal and regulatory requirements and particularly targeted high-risk, fast-growth species in the HFTD, such as eucalyptus, pine, oak and sycamore. Both trees that could grow within the 25-foot clearance of the power line or, alternatively, blow into the clearance area, were coded for trimming where feasible.”

- a. Provide documentation that demonstrates specifically when SDG&E’s 25-foot clearance program that “expanded beyond legal and regulatory requirements” was approved by the Commission.
- b. Provide documentation that explains in detail if there were other tree species than those listed (eucalyptus, pine, oak, and sycamore) trimmed to 25 feet. Please list all tree species that were trimmed to 25 feet and the recorded cost for this activity.
- c. Provide documentation that demonstrates that each species trimmed to 25 feet specifically is high-risk and fast-growing.
- d. Provide documentation that explains in detail if SDG&E considers all trees in these high-risk, fast-growth species to be high-risk trees.
- e. Provide documentation that explains in detail what is meant by the condition “where feasible.” Provide SDG&E’s guidelines that determine whether a 25-foot trim is feasible.

SDG&E Response: 03

SDG&E objects to this request on the grounds set forth in General Objections Nos. 4, 5, 6, 7, and 9. Subject to the foregoing objections, SDG&E responds as follows:

- a. SDG&E’s enhanced vegetation management program was included in its 2019 WMP (see Section 4.4.3). The Commission approved SDG&E’s 2019 WMP in D.19-05-039. The enhanced vegetation management program was also included in SDG&E’s 2020 WMP (see Section 5.3.5.9). The Commission ratified the approval of SDG&E’s 2020 WMP in Resolution WSD-005.
- b. Please see attachment titled DR-003_Q3b.xls
- c. Not all trees trimmed to 25-foot clearance are specifically categorized as high-risk or fast-growing. While SDG&E considers certain species of trees to be of higher risk generally,

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species alone is not the sole determinant of whether an individual tree is considered high-risk or fast-growing. SDG&E may trim a tree of any species to 25-feet if that tree poses a potential risk based on its growth, site-specific conditions, to apply best pruning practices, and/or has a compromised structural condition that may cause a conflict with the power lines.

- d. Not all trees SDG&E considers as targeted species are high-risk or fast-growing. The application of the 25-foot clearance is not performed in every instance of a targeted species. SDG&E applies enhanced clearances where it is feasible to do so based on site-specific and tree-specific conditions. See the response to Question 3(e) below for additional detail.
- e. Twenty-five feet is not applied as an arbitrary, pre-determined clearance at time-of-trim. Many criteria are considered in determining whether obtaining 25-foot clearance is prudent and/or “feasible.” The exact and actual clearance achieved depends on several factors including tree species, growth rate, structure, past pruning practices, wind sway, etc. One of the primary determinants is ensuring that the clearance will not jeopardize the health of the tree or create a negative impact on its structural integrity. Another factor is whether the increased clearances remove previous inter-nodal branch cuts to eliminate rapid resprouting. Additionally, a tree should have sufficient branching architecture that supports applying industry standard “directional pruning” to “train” the tree to grow away from the power lines.

PUBLIC ADVOCATES DATA REQUEST
PUBADV-SDG&E-DR-001-RYD
SDG&E TREE TRIMMING – A.20-07-003
SDG&E RESPONSE - SUPPLEMENT
DATE RECEIVED: JULY 22, 2020
DATE RESPONDED: OCTOBER 2, 2020

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

**PUBLIC ADVOCATES DATA REQUEST
PUBADV-SDG&E-DR-001-RYD
SDG&E TREE TRIMMING – A.20-07-003
SDG&E RESPONSE - SUPPLEMENT
DATE RECEIVED: JULY 22, 2020
DATE RESPONDED: OCTOBER 2, 2020**

create documents that do not currently exist.

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.

**PUBLIC ADVOCATES DATA REQUEST
PUBADV-SDG&E-DR-001-RYD
SDG&E TREE TRIMMING – A.20-07-003
SDG&E RESPONSE - **SUPPLEMENT**
DATE RECEIVED: JULY 22, 2020
DATE RESPONDED: OCTOBER 2, 2020**

III. RESPONSES

Question 1

Referring to Exhibit SDG&E-02, Attachment A of the Application of SDG&E for Recovery of Undercollection Recorded in the Tree Trimming Balancing Account, SDG&E requests recovery of the 2019 undercollected balance of \$10,420,644 in the Tree Trimming Balancing Account (TTBA).

In an Excel spreadsheet, provide the line item detail that specifically identifies each recorded cost associated with the programs and activities recorded in the TTBA for each year in 2015-2019 broken down by labor and non-labor (for example, contracts, programs/projects, audits, pre-inspections, etc.).

SDG&E Response: 01 Supplement

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 3, 5, and 9. Subject to the foregoing objections, SDG&E replies as follows:

Please see attached excel file titled “2017 - 2019 TTBA O&M by categoryDR1Q1 - Supplemental.xlsx”

The excel file shows the total 2017, 2018 and 2019 O&M activity broken down by category and by period. To view further line item details for expenses, please double click on the specific cell and a separate tab within the excel file will generate providing individual line item detail that makes up the total.

**PUBLIC ADVOCATES DATA REQUEST
PUBADV-SDG&E-DR-001-RYD
SDG&E TREE TRIMMING – A.20-07-003
SDG&E RESPONSE - SUPPLEMENT
DATE RECEIVED: JULY 22, 2020
DATE RESPONDED: OCTOBER 2, 2020**

Question 3

On page 8, lines 12-13, SDG&E asserts the removal of hazard trees is a primary driver of TTBA cost increases.

- a. Provide documentation that explains in detail if the number of hazard trees removed in 2019 was higher than the hazard trees removed during 2015-2018.
- b. Provide the number of hazard trees removed, the number of hazard trees identified, and the number of hazard trees trimmed each year in 2015-2019 and the recorded costs for each activity.
- c. Provide the average cost per hazard tree removal in each year from 2015-2019.

SDG&E Response: 03 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

- a. The table below provides the number of hazard trees inspected, trimmed, and removed in years 2017, 2018 and 2019.

Hazard Trees	2017	2018	2019
Inspected	6,875	15,361	20,995
Trimmed	8,497	11,863	18,369
Removed	540	491	509

- b. The average cost per hazard tree removal 2017 was \$639.94
The average cost per hazard tree removal 2018 was \$666.45.
The average cost per hazard tree removal 2019 was \$810.59.

**PUBLIC ADVOCATES DATA REQUEST
PUBADV-SDG&E-DR-001-RYD
SDG&E TREE TRIMMING – A.20-07-003
SDG&E RESPONSE - SUPPLEMENT
DATE RECEIVED: JULY 22, 2020
DATE RESPONDED: OCTOBER 2, 2020**

Question 4

On page 10, lines 14-16, SDG&E asserts there are increased costs due to approximately 1000 customer refusal resolution efforts.

- a. Provide documentation that explains in detail if during 2014-2018, there were more customer refusals recorded then there were in 2019.
- b. Provide the number of customer refusals in each year from 2015-2019.
- c. Provide documentation that explains if customer refusals offer a cost saving or increases costs when SDG&E is unable to perform the work originally forecasted.
- d. Provide documentation that demonstrates the calculations for costs associated with customer refusals and the recorded adjustments associated with this activity for 2014-2019.

SDG&E Response: 04 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

- a. Customer refusals increased in 2019 primarily as a result in the increased scope and volume of work associated with “reliability” or hazard tree work. This scope increase included trees where greater clearances were pursued than had previously been achieved. The table below provides the total number of refusals in 2017, 2018 and 2019.

Refusals	2017	2018	2019
Properties	528	874	922

**PUBLIC ADVOCATES DATA REQUEST
PUBADV-SDG&E-DR-001-RYD
SDG&E TREE TRIMMING – A.20-07-003
SDG&E RESPONSE - SUPPLEMENT
DATE RECEIVED: JULY 22, 2020
DATE RESPONDED: OCTOBER 2, 2020**

Question 5

On page 10, lines 17-18, SDG&E asserts enhanced vegetation management programs have resulted in increased biomass and recycling costs. Provide documentation that demonstrates the breakdown of biomass, recycling, and composting costs associated with tree removal in each year from 2014-2019.

SDG&E Response: 05 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

The table below represents the total annual tonnage of green waste diverted to biomass landfill and recycle facilities in years 2017, 2018 and 2019, and the associated costs. SDG&E does not track and quantify volume and costs of biomass individually between trimming and removal.

Biomass/Landfill	Tonnage	Cost
2017	5,755.87	\$239,003
2018	7962.13	\$209,198
2019	5706.12	\$277,927

Recycle/Compost	Tonnage	Cost
2017	2,759.34	\$121,693
2018	3,536.48	\$159,489
2019	3,564.43	\$149,998

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SDG&E TREE TRIMMING – A.20-07-003
SDG&E RESPONSE - SUPPLEMENT
DATE RECEIVED: JULY 22, 2020
DATE RESPONDED: OCTOBER 2, 2020**

Question 7

Provide documentation that explains if during 2014-2018, SDG&E enacted a complete line patrol and 100% audit of all hazard and reliability tree work in the HFTD. If no, please explain why not. If yes, please provide a spreadsheet breaking down the costs of these audits in each year they occurred from 2014-2019.

SDG&E Response: 07 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

In 2018 and 2017 SDG&E performed a line patrol in conjunction with the audit activity within the HFTD. This patrol involved a cursory look at the lines to determine whether any trees may require pruning prior to the next routinely-scheduled pre-inspection activity. In 2019 SDG&E performed an enhanced level-2 inspection. Prior to 2019, audit patrols did not include a detailed, level-2 inspection. Prior to 2019, SDG&E did not track separately the costs associated with the line patrol and the audit activity.

**PUBLIC ADVOCATES DATA REQUEST
PUBADV-SDG&E-DR-001-RYD
SDG&E TREE TRIMMING – A.20-07-003
SDG&E RESPONSE - SUPPLEMENT
DATE RECEIVED: JULY 22, 2020
DATE RESPONDED: OCTOBER 2, 2020**

Question 8

On page 11, lines 21-22, SDG&E asserts wildfire plans by other utilities and increased mitigation statewide led to higher labor costs associated with vegetation management in 2019.

Provide documentation that supports SDG&E’s assertion and demonstrates specifically that wildfire cost increases were driven by work volume at the same time SDG&E was hiring outsourced crews, including total vegetation management labor costs for each year in 2014-2019. In the response provide an itemized breakdown of each recorded labor cost (for example, audits, trimming, removal, inspections, etc.) in each of these years.

SDG&E Response: 08 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

Please see the attached excel file titled
“2019 vs 2018 vs 2017 comparison tree trimming expensesDR1Q8 - Supplemental.xlsx”

The excel file shows a comparison of 2017, 2018 and 2019 expenses related to tree trimming work. To view further line item details for expenses, please double click on the particular cell and a separate tab within the excel file will generate providing each individual line item that makes up the total.

The table below provides a comparison of the volume of work in 2019 vs. 2017-2018. Though the total number of trees trimmed was less in 2019 vs 2018 the total overall costs in 2019 were higher due to several factors including: higher contractual rates, higher proportion of hazard trees trimmed and removed, increased number of tree crews, and the incorporation of outsourced crews and associated expenses. Additionally, the total number of trees removed in 2019 was markedly higher than in 2018. Refer to Question 1 Supplement response, above, for recorded cost.

Trees Worked	2017	2018	2019
Inspected	455,250	457,800	453,330
Trimmed	155,785	175,990	161,915
Removed	7189	8105	9008

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PUBADV-SDG&E-DR-001-RYD
SDG&E TREE TRIMMING – A.20-07-003
SDG&E RESPONSE - SUPPLEMENT
DATE RECEIVED: JULY 22, 2020
DATE RESPONDED: OCTOBER 2, 2020**

Question 9

On page 12, lines 7-8, please provide the line item detail of each cost in the reported approximately \$60,000 per week cost of outsourced crews. How much did SDG&E spend on outsourced crews in 2014-2018?

SDG&E Response: 09 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

SDG&E tree trim contractors did not utilize outside crew resources prior to 2019.

**PUBLIC ADVOCATES DATA REQUEST
PUBADV-SDG&E-DR-001-RYD
SDG&E TREE TRIMMING – A.20-07-003
SDG&E RESPONSE - SUPPLEMENT
DATE RECEIVED: JULY 22, 2020
DATE RESPONDED: OCTOBER 2, 2020**

Question 11

Provide documentation that explains if the number of “exigent conditions” were greater in 2019 than in 2014-2018. If not, please explain why this is a driver of higher costs in 2019.

SDG&E Response: 11 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

SDG&E experienced twenty-two (22) Red Flag Warning (RFW) days in 2017, and ten (10) RFW days each in years 2018 and 2019. Extreme fire danger during these events effectively shut down tree operations within the HFTD, with the exception of emergency work perceived as necessary to prevent an outage or ignition. The same work restraints apply during days where the SDG&E Fire Potential Index (FPI) is rated as Extreme. SDG&E experienced sixteen (16) Extreme FPI days in 2017, eleven (11) days of Extreme FPI in 2018, and nine (9) days of Extreme FPI in 2019. Any emergency trimming work performed during these extreme conditions must be performed with professional fire resources on standby. The downtime and loss of production during these events generally increases subsequent costs because when routine tree work recommences, additional overtime and weekend resources may be required to complete delayed work. Higher contractual costs and the onboarding costs associated with the addition of outsourced crews contributed to increased costs associated with these conditions in 2019 over 2018.

**PUBLIC ADVOCATES DATA REQUEST
PUBADV-SDG&E-DR-001-RYD
SDG&E TREE TRIMMING – A.20-07-003
SDG&E RESPONSE - **SUPPLEMENT**
DATE RECEIVED: JULY 22, 2020
DATE RESPONDED: OCTOBER 2, 2020**

Question 12

In an Excel spreadsheet, provide the line item detail that specifically identifies each recorded cost associated with SDG&E employee and contractor costs incurred for lunches, entertainment, lodging and other employee reimbursable costs recorded in the TTBA for each year in 2014-2019, including the number of employees, date, location, and vendor.

SDG&E Response: 12 Supplement

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows:

Please see attached spreadsheet titled, “PubAdv_DR_001_RYD_Q12.xlsx” for costs associated with lodging and per diem for additional, outsourced tree crews in 2019.

SDG&E did not use contractors prior to 2019.....

Exhibit 12

DR: Follow up Emails dated September 3, 11, 15 and 16, 2020

Jasso, Norma G

From: Jasso, Norma G
Sent: Wednesday, September 16, 2020 4:34 PM
To: Andresen, Ryan
Cc: Van Geffen, John T.; Godfrey, Tamera; Fulton, Laura M; Central Files
Subject: RE: A.20-07-003, Public Advocates Office Tree Trimming Balancing Account data request PubAdv-SDG&E-003-RYD
Attachments: PubAdv-SDGE-003-RYD_FollowUp2Response.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Hi Ryan,
Attached please find SDG&E's response to yesterday's additional question regarding PubAdv-SDG&E-003-RYD.

Regards,
Norma G Jasso
Regulatory Case Manager

From: Andresen, Ryan <Ryan.Andresen@cpuc.ca.gov>
Sent: Tuesday, September 15, 2020 12:32 PM
To: Jasso, Norma G <NJasso@semprautilities.com>
Cc: Van Geffen, John T. <John.VanGeffen@cpuc.ca.gov>; Godfrey, Tamera <tamera.godfrey@cpuc.ca.gov>; Fulton, Laura M <LFulton@sdge.com>
Subject: [EXTERNAL] Re: A.20-07-003, Public Advocates Office Tree Trimming Balancing Account data request PubAdv-SDG&E-003-RYD

*** EXTERNAL EMAIL - Be cautious of attachments, web links, and requests for information ***

Hi Norma,

I hope you are getting a break from the smoke like I am today.

I have an additional question regarding the table provided in question 1 of this follow up to PubAdv-SDG&E-003-RYD. The number of trees trimmed to a 20-30' clearance of distribution lines has been steadily increasing in most recent years before the 2019 expanded clearances program. Could you please help me understand why so many trees were already being trimmed to this clearance before the program, and also how the expanded clearance program is different from these previous expanded clearances?

Thank you,
Ryan

From: "Andresen, Ryan" <Ryan.Andresen@cpuc.ca.gov>
Date: Friday, September 11, 2020 at 2:50 PM
To: "Jasso, Norma G" <NJasso@semprautilities.com>
Cc: "Van Geffen, John T." <John.VanGeffen@cpuc.ca.gov>, "Godfrey, Tamera"

<tamera.godfrey@cpuc.ca.gov>, "Fulton, Laura M" <LFulton@sdge.com>

Subject: Re: A.20-07-003, Public Advocates Office Tree Trimming Balancing Account data request PubAdv-SDG&E-003-RYD

Hi Norma,

Thank you for providing these responses.

Have a nice weekend,
Ryan

From: "Jasso, Norma G" <NJasso@semprautilities.com>

Date: Friday, September 11, 2020 at 2:47 PM

To: "Andresen, Ryan" <Ryan.Andresen@cpuc.ca.gov>

Cc: "Van Geffen, John T." <John.VanGeffen@cpuc.ca.gov>, "Godfrey, Tamera" <tamera.godfrey@cpuc.ca.gov>, "Fulton, Laura M" <LFulton@sdge.com>, Central Files <CentralFiles@semprautilities.com>

Subject: RE: A.20-07-003, Public Advocates Office Tree Trimming Balancing Account data request PubAdv-SDG&E-003-RYD

Hi Ryan,

Attached please find SDG&E's response to your questions clarifying SDG&E's responses to PubAdv-SDG&E-003-RYD.

Excel file referenced in the response is attached as well.
DR-003_Q3b_FollowUp.xls

Regards,



A Sempra Energy utility®

Norma G Jasso

Regulatory Case Manager

8330 Century Park Ct, CP31E

San Diego, CA 92123

Office 858-654-3535 Cell 619-385-2021

NJasso@semprautilities.com

From: Jasso, Norma G <NJasso@semprautilities.com>
Sent: Thursday, September 03, 2020 6:00 PM
To: Andresen, Ryan <Ryan.Andresen@cpuc.ca.gov>
Cc: Godfrey, Tamera <tamera.godfrey@cpuc.ca.gov>; Fulton, Laura M <LFulton@sdge.com>
Subject: RE: A.20-07-003, Public Advocates Office Tree Trimming Balancing Account data request PubAdv-SDG&E-003-RYD

Hi Ryan.

I'll review your note with the team and will get back to you next week after the holiday. Oh, and please include Laura Fulton in any future communications.

Have a great holiday weekend and stay safe.

Norma

From: Andresen, Ryan <Ryan.Andresen@cpuc.ca.gov>
Sent: Thursday, September 3, 2020 3:16 PM
To: Jasso, Norma G <NJasso@semprautilities.com>
Cc: Godfrey, Tamera <tamera.godfrey@cpuc.ca.gov>
Subject: [EXTERNAL] Re: A.20-07-003, Public Advocates Office Tree Trimming Balancing Account data request PubAdv-SDG&E-003-RYD

*** EXTERNAL EMAIL - Be cautious of attachments, web links, and requests for information ***

Hi Norma,

I have a few questions to clarify SDG&E's responses to PubAdv-SDG&E-003-RYD:

- In the second table provided for question 1k, titled "Trees Trimmed to Clearance Levels," it appears many trees were trimmed to greater than 20-foot clearances prior to 2019. Question 1g states the 25-foot program did not begin until March 2019. Is the table in 1k referring to transmission clearances only?
- In the Excel file provided for Question 3b, "DR-003_Q3b," could you provide the full species names? Many acronyms are duplicates as is. Could you please also let me know what the two reliability codes mean?
- In the chart provided for question 1i, "Vegetation Contacts 1995-2019," could you please provide the specific number of contacts at each of these data points?

Thank you for your help,
Ryan

PUBLIC ADVOCATES OFFICE DATA REQUEST
SDG&E TTBA – A.20-07-003
DATE RECEIVED: SEPTEMBER 3, 2020
DATE RESPONDED: SEPTEMBER 11, 2020
FollowUp: PubAdv-SDG&E-003-RYD

Reference: PubAdv-SDG&E-003-RYD - Follow-up Questions by Email 9/3/2020
Subject: Tree Trimming Balancing Account (TTBA)

1. In the second table provided for question 1k, titled “Trees Trimmed to Clearance Levels,” it appears many trees were trimmed to greater than 20-foot clearances prior to 2019. Question 1g states the 25-foot program did not begin until March 2019. Is the table in 1k referring to transmission clearances only?

SDG&E Response 1:

The referenced table includes clearances for both distribution and transmission. The table below includes the breakout of distribution and transmission.

	20 - 30' Clearance			
	Transmission	Distribution	Total	% Transmission
2006	1829	413	2242	81.6%
2007	2431	772	3203	75.9%
2008	3929	2308	6237	63.0%
2009	5339	2844	8183	65.2%
2010	4801	3380	8181	58.7%
2011	5176	2313	7489	69.1%
2012	4724	1947	6671	70.8%
2013	3913	2186	6099	64.2%
2014	4002	4024	8026	49.9%
2015	5276	5181	10457	50.5%
2016	5986	7784	13770	43.5%
2017	3792	6064	9856	38.5%
2018	5349	8010	13359	40.0%
2019	4691	10463	15154	31.0%

PUBLIC ADVOCATES OFFICE DATA REQUEST

SDG&E TTBA – A.20-07-003

DATE RECEIVED: SEPTEMBER 3, 2020

DATE RESPONDED: SEPTEMBER 11, 2020

FollowUp: PubAdv-SDG&E-003-RYD

2. In the Excel file provided for Question 3b, “DR-003_Q3b,” could you provide the full species names? Many acronyms are duplicates as is. Could you please also let me know what the two reliability codes mean?

SDG&E Response 2:

Please see attached titled, “DR-003_Q3b_FollowUp”.

The term ‘reliability’ is used to describe a tree that poses a potential danger or threat to overhead electrical facilities due to poor health, structural deficiency, and/or site-specific conditions. Reliability tree identification includes risk assessment and is crucial for safety, outage reduction, and fire avoidance. Reliability trees may be located inside or outside of the utility right-of-way, and may additionally require pruning to prevent encroachment into the minimum vegetation clearance distance by growth. Reliability trees are those that may impact the facilities within the annual inspection cycle and, depending upon scope of work, may include overhanging branches and/or dead wood.

The two reliability codes include the following:

- 1) CDRP; Completed Dead Reliability Pruned – pruning completed on a dead/dying tree that posed a threat to the power lines
- 2) CGRP; Completed Green Reliability – pruning completed on portions of a live tree that posed a threat to the power lines (e.g., included bark, diseased, decay, heavy lean, overhangs, structural defects, etc.)

PUBLIC ADVOCATES OFFICE DATA REQUEST

SDG&E TTBA – A.20-07-003

DATE RECEIVED: SEPTEMBER 3, 2020

DATE RESPONDED: SEPTEMBER 11, 2020

FollowUp: PubAdv-SDG&E-003-RYD

3. In the chart provided for question 1i, “Vegetation Contacts 1995-2019,” could you please provide the specific number of contacts at each of these data points?

SDG&E Response 3:

1995	424
1996	475
1997	442
1998	282
1999	59
2000	42
2001	64
2002	102
2003	113
2004	72
2005	70
2006	79
2007	72
2008	109
2009	80
2010	130
2011	29
2012	39
2013	29
2014	52
2015	32
2016	52
2017	39
2018	27
2019	50

PUBLIC ADVOCATES OFFICE DATA REQUEST

SDG&E TTBA – A.20-07-003

DATE RECEIVED: SEPTEMBER 15, 2020

DATE RESPONDED: SEPTEMBER 16, 2020

Second FollowUp: PubAdv-SDG&E-003-RYD

Reference: PubAdv-SDG&E-003-RYD - Follow-up Question by Email 9/15/2020

Subject: Tree Trimming Balancing Account (TTBA)

Question 1

Additional question regarding the table provided in question 1 of this follow up to PubAdv-SDG&E-003-RYD. The number of trees trimmed to a 20-30' clearance of distribution lines has been steadily increasing in most recent years before the 2019 expanded clearances program. Could you please help me understand why so many trees were already being trimmed to this clearance before the program, and also how the expanded clearance program is different from these previous expanded clearances?

SDG&E Response 1:

SDG&E did trim trees throughout its service territory to a 20-30' clearance on its distribution lines prior to establishing its 2019 enhanced vegetation management program. In a majority of instances, these greater clearances were deemed necessary to abate a hazardous tree condition such as dead/dying/diseased branches and/or a structural defect such as included bark or weak branch attachments. To mitigate such hazards requires cutting further into a tree's canopy and may result in trees being trimmed to a greater clearance. The clearance table provided in Question 1 includes all species trimmed to the greater clearances.

SDG&E's enhanced vegetation management program focuses on the five targeted species identified as being the most problematic to manage, and is limited to trees in the HFTD. The scope of the enhanced program also includes greater clearances for any species that may conflict with the lines considering multiple and contributory factors such as growth rate, canopy wind sway, conductor movement (sag, sway), directional pruning standards, growth rate, inspection cycle, tree health, structural defects, etc.

Exhibit 13

DR: PubAdv-SDG&E-004-RYD, dated September 2, 2020



Public Advocates Office
California Public Utilities Commission

505 Van Ness Avenue
San Francisco, CA 94102

<http://publicadvocates.cpuc.ca.gov>

DATA REQUEST
San Diego Gas & Electric Company Tree Trimming Balancing Account
A.20-07-003

Origination Date: September 2, 2020

Responses Due: September 17, 2020

To: Norma G. Jasso, njasso@semprautilities.com
Laura M. Fulton, lfulton@sdge.com

From: Tamera Godfrey, Project Coordinator
Public Advocates Office
505 Van Ness Avenue, Room 4104
San Francisco, CA 94102 tlg@cpuc.ca.gov

Originated by: Ryan Andresen
Phone: 415-703-3089
Email: Ryan.Andresen@cpuc.ca.gov

Data Request No: PubAdv-SDG&E-004-RYD
Exhibit Reference: Exhibit SDG&E-01 & SDG&E Response to PUBADV-SDG&E-DR-001-RYD

SDG&E Witness: Various
Subject: Tree Trimming Balancing Account (TTBA)

1. Referring to “2019 TTBA O&M by categoryDR1Q1.xlsx” from SDG&E’s response to Data Request PUBADV-SDG&E-DR-001-RYD, question 1, please provide an invoice that includes the amount (line item detail for the recorded cost), date, location, number of employees, and vendor for the following:

Cost	Vendor	Range [Ref. document number]
66,124.86	CDCE INCORPORATED	5811527644
28,143.24	CDCE INCORPORATED	5811515976
17,500.00	AECOM TECHNICAL SERVICES INC	11020569
17,500.00	AECOM TECHNICAL SERVICES INC	11020733
12,600.00	AECOM TECHNICAL SERVICES INC	5811443202
10,000.00	CEATI INTERNATIONAL INC	1900417812
8,500.00	CEATI INTERNATIONAL INC	1900406475
1,309.70	RR DONNELLEY	5800794985

2. Referring to Don Akau's testimony, Exhibit SDG&E-01, p. 8 lines 12-13, SDG&E states, "the primary driver of the TTBA cost increases is associated with the removal of hazard trees."

Additionally, in the response to Data Request PUBADV-SDG&E-DR-001-RYD, question 3, SDG&E shows that the number of hazard trees removed increased by only 18 trees, from 491 in 2018 to 509 in 2019. The average cost for a hazard tree removal was \$666.45 in 2018 and \$810.59 in 2019.

- a. These figures represent a total cost of hazard tree removal of \$327,226.95 in 2018 and \$412,590.31 in 2019. Please explain how an increase in cost of \$85,363.36 is "the primary driver" of the \$10.4 million undercollection.
 - b. Provide supporting documentation and invoices demonstrating that the average cost of a hazard tree removal increased by \$144.14 from 2018 to 2019.
 - c. Provide supporting documentation and invoices demonstrating that the number of hazard tree removals increased by 18 trees from 2018 to 2019.
3. Referring to Don Akau's testimony, Exhibit SDG&E-01, p. 9, lines 5-7, SDG&E asserts, "in 2019, SDG&E identified and remediated approximately 9,538 hazard trees, compared to 5,512 trees identified in 2015." SDG&E's statements made in its testimony appear to conflict with information SDG&E provided in its data request responses to Cal Advocates.
 - a. Provide documentation that explains and clarifies the information in SDG&E's testimony regarding the 9,538 hazard trees that were identified and remediated and the statements provided in SDG&E's response to Data Request PUBADV-SDG&E-DR-001-RYD, question 3b, that 20,995 trees were inspected, 18,369 were trimmed, and 509 were removed.
 - b. Please identify and provide specific evidence showing the difference in the number of hazard trees "identified and remediated" and the number of hazard trees inspected, trimmed, or removed.
 - c. Provide documentation that demonstrates the true number of hazard trees identified in each year from 2015-2019.
4. Referring to Don Akau's testimony, Exhibit SDG&E-01, p. 9 lines 9-10, SDG&E states, "costs can start at hundreds of dollars, but typical tree removal costs in the tens of thousands."
 - a. Provide documentation that identifies specifically how a "typical tree removal" costs tens of thousands of dollars, yet in 2019 the average cost for a hazard tree removal was \$810.59 (response to Data Request PUBADV-SDG&E-DR-001-RYD, question 3c).
 - b. In a MS Excel spreadsheet, provide a breakdown of each cost associated with hazard tree removal recorded in the TTBA in 2018 and 2019.
5. Referring to Don Akau's testimony, Exhibit SDG&E-01, p. 10, lines 1-2, SDG&E asserts, "routine tree trim rates for hazard or reliability tree removal/trim increased 11% between 2018 and 2019." Provide the average rate for a hazard tree trim in 2018 and 2019.

6. Referring to SDG&E's response to Data Request PUBADV-SDG&E-DR-001-RYD, question 4, SDG&E replies, "customer refusals increased in 2019 primarily as a result in the increased scope and volume of work associated with "reliability" or hazard tree work. This scope includes trees where greater clearances were pursued than had previously been achieved."

Additionally, in Exhibit SDG&E-01, p. 10 lines 14-16, SDG&E states, "there are approximately 1000 customer refusals in the HFTD, resulting in increased costs to achieve resolution and compliance with SDG&E's vegetation management programs."

- a. Provide the number of customer refusals in 2019 associated with "trees where greater clearances were pursued."
 - b. Provide the calculations that SDG&E relied upon when determining customer refusals are a driver of 2019 TTBA cost increases.
 - c. Provide an estimate of the portion of the 2019 TTBA cost increase that was driven by customer refusals. Provide an estimate of the total cost of customer refusals recorded in the TTBA in 2018.
 - d. Please explain if the 826 refusals recorded in the data request response refer to the "approximately 1000 customer refusals" mentioned above in the testimony.
7. Referring to SDG&E's response to Data Request PUBADV-SDG&E-DR-001-RYD, question 5, the average cost per ton of biomass/landfill increased from approximately \$26.27 in 2018 to \$48.71 in 2019. Provide supporting documentation showing that the cost per ton of biomass/landfill costs increased so significantly between 2018 and 2019.
 8. Referring to SDG&E's response to Data Request PUBADV-SDG&E-DR-001-RYD, question 7, SDG&E replies, "Prior to 2019, SDG&E did not track separately the costs associated with the line patrol and the audit activity." Provide the calculations SDG&E relied upon to determine that a complete line patrol and 100% audit were a driver of increased TTBA costs in 2019.
 9. The following refer to "2019 vs 2018 comparison tree trimming expensesDR1Q8.xlsx" from SDG&E's response to Data Request PUBADV-SDG&E-DR-001-RYD, question 8:
 - a. Please provide the missing information for row 8, where the vendor name is marked "(blank)" (amounts -\$571,399 in 2019 and -\$824,415 in 2018), including vendor name and description.

- b. Please provide an invoice that includes the amount (line item detail for the recorded cost), date, location, number of trees trimmed, number of employees, and vendor for the following 2019 tree trimming activities:

Cost	Vendor	Range [Ref. document number]
928,372.05	DAVEY TREE SURGERY CO	11020210
923,298.39	UTILITY TREE SERVICE LLC	11020210
662,917.63	DAVEY TREE SURGERY CO	11018136
546,185.94	DAVEY TREE SURGERY CO	11019495
528,341.00	DAVEY TREE SURGERY CO	11018744
368,319.78	GIS SURVEYORS INC	5810731451
195,146.25	UTILITY TREE SERVICE LLC	5811142941
175,809.79	UTILITY TREE SERVICE LLC	5810824162
173,120.48	UTILITY TREE SERVICE LLC	5811132497
163,140.03	UTILITY TREE SERVICE LLC	5810809349
149,232.48	UTILITY TREE SERVICE LLC	5810824163
143,725.53	DAVEY TREE SURGERY CO	5810952438
141,134.55	UTILITY TREE SERVICE LLC	5810809355
132,149.66	UTILITY TREE SERVICE LLC	5810929352
131,553.03	UTILITY TREE SERVICE LLC	5810809353
131,447.56	DAVEY TREE SURGERY CO	5810875660
131,291.82	UTILITY TREE SERVICE LLC	5810919932
130,931.20	UTILITY TREE SERVICE LLC	5811034850
124,545.29	UTILITY TREE SERVICE LLC	5810919930
123,907.42	UTILITY TREE SERVICE LLC	5810919931
123,182.81	UTILITY TREE SERVICE LLC	5810998868
121,397.54	DAVEY TREE SURGERY CO	5810875659
120,624.31	UTILITY TREE SERVICE LLC	5810919933
120,206.62	DAVEY TREE SURGERY CO	5811132191
119,976.64	UTILITY TREE SERVICE LLC	5811132494

- c. Please provide an invoice that includes the amount (line item detail for the recorded cost), date, location, number of trees trimmed, number of employees, and vendor for the following 2018 tree trimming activities:

Cost	Vendor	Range [Ref. document number]
568,711.09	UTILITY TREE SERVICE LLC	11020530
293,344.48	UTILITY TREE SERVICE LLC	5811190787
291,879.56	UTILITY TREE SERVICE LLC	5811190788
268,684.22	UTILITY TREE SERVICE LLC	5811538807
258,731.75	UTILITY TREE SERVICE LLC	5811267009
257,422.19	UTILITY TREE SERVICE LLC	11021007
241,713.70	UTILITY TREE SERVICE LLC	5811172596
202,279.00	UTILITY TREE SERVICE LLC	5811538946
189,093.52	UTILITY TREE SERVICE LLC	5811538812
188,919.95	UTILITY TREE SERVICE LLC	5811171327
187,982.39	UTILITY TREE SERVICE LLC	5811235595
181,586.06	DAVEY TREE SURGERY CO	5811190242
176,500.60	DAVEY TREE SURGERY CO	5811333591
173,530.68	DAVEY TREE SURGERY CO	11022519
172,954.10	UTILITY TREE SERVICE LLC	5811235712
169,407.71	UTILITY TREE SERVICE LLC	5811300678
164,654.40	DAVEY TREE SURGERY CO	5811450597
160,349.32	DAVEY TREE SURGERY CO	5811365969
152,678.32	UTILITY TREE SERVICE LLC	5811208195
144,590.28	UTILITY TREE SERVICE LLC	5811334124
142,630.69	DAVEY TREE SURGERY CO	11021729
141,320.70	UTILITY TREE SERVICE LLC	5811538810
140,145.04	DAVEY TREE SURGERY CO	5811283920
138,069.64	UTILITY TREE SERVICE LLC	5811334123
137,181.24	DAVEY TREE SURGERY CO	5811421112

- d. Please update “2019 vs 2018 comparison tree trimming expensesDR1Q8.xlsx” to include a column with the number of trees trimmed for each cost marked “Tree Trimming.”

10. The following refer to SDG&E’s response to Data Request PUBADV-SDG&E-DR-001-RYD, question 9:

- a. Provide all invoices associated with the weekly labor cost of \$59,221.30 of the 8 outsourced crews, including the number of weeks each crew worked.
- b. Provide the total number of hours each crew spent in training.

- c. On p. 12, line 9, SDG&E states, “for one of SDG&E’s major contractors, the increase in overtime pay – at time and a half rates – over 2018 was approximately \$242,000.” Provide documentation that explains if the overtime pay is in addition to the 10 hours weekly overtime referenced in the table provided in response to Question 9.
 - d. Provide the total amount spent on outsourced crews in 2019 recorded in the TTBA. Provide the total amount which was overtime pay.
11. Referring to SDG&E’s response to Data Request PUBADV-SDG&E-DR-001-RYD, question 11, SDG&E replies, “higher contractual costs and the onboarding costs associated with the addition of outsourced crews contributed to increased costs associated with these conditions in 2019 over 2018.” Provide the total amount spent on the above costs due to exigent conditions in 2018 and in 2019.

END OF REQUEST

INSTRUCTIONS

You are instructed to answer the Data Requests in the above-captioned proceeding, with written, verified responses pursuant to Public Utilities Code §§ 309.5, 314, 314.5, 581 and 582, and Rules 1.1 and 10.1 of the California Public Utilities Commission’s Rules of Practice and Procedure. Restate the text of each request prior to providing the response. If you have any questions regarding this data request, please contact the Originator at the email address or phone number above.

Each Data Request is continuing in nature such that if any information provided changes, or new information becomes available that is responsive to a request, respondent is required to supplement its response to the Public Advocates Office. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Originator and Project Coordinator(s) as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. All data responses need to have each page numbered, referenced, and indexed so worksheets can be followed. If any numbers are calculated, include a copy of all supporting electronic files, with data and formulas intact and functioning, so that the formula and their sources can be reviewed. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word or Excel format, send the Word document or Excel file and do not send the information only as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible.

Documents produced in response to the data requests should be numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by page numbers.

If a request, definition, or an instruction, is unclear, notify the data request Originator and the Project Coordinator(s) as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Provide two copies of the above information as it becomes available but no later than the due date identified above. Provide electronic responses and set of hard copy responses with your submittal to the data request Originator and the Project Coordinator(s).

Exhibit 14

SDG&E DR responses dated October 23, 2020

PUBLIC ADVOCATES OFFICE DATA REQUEST

SDG&E TTBA – A.20-07-003

DATE RECEIVED: SEPTEMBER 2, 2020

DATE RESPONDED: OCTOBER 23, 2020

PubAdv-SDG&E-004-RYD

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

PUBLIC ADVOCATES OFFICE DATA REQUEST

SDG&E TTBA – A.20-07-003

DATE RECEIVED: SEPTEMBER 2, 2020

DATE RESPONDED: OCTOBER 23, 2020

PubAdv-SDG&E-004-RYD

burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

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.

PUBLIC ADVOCATES OFFICE DATA REQUEST

SDG&E TTBA – A.20-07-003

DATE RECEIVED: SEPTEMBER 2, 2020

DATE RESPONDED: OCTOBER 23, 2020

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6. Referring to SDG&E's response to Data Request PUBADV-SDG&E-DR-001-RYD, question 4, SDG&E replies, "customer refusals increased in 2019 primarily as a result in the increased scope and volume of work associated with "reliability" or hazard tree work. This scope includes trees where greater clearances were pursued than had previously been achieved."

Additionally, in Exhibit SDG&E-01, p. 10 lines 14-16, SDG&E states, "there are approximately 1000 customer refusals in the HFTD, resulting in increased costs to achieve resolution and compliance with SDG&E's vegetation management programs."

- a. Provide the number of customer refusals in 2019 associated with "trees where greater clearances were pursued."
- b. Provide the calculations that SDG&E relied upon when determining customer refusals are a driver of 2019 TTBA cost increases.
- c. Provide an estimate of the portion of the 2019 TTBA cost increase that was driven by customer refusals. Provide an estimate of the total cost of customer refusals recorded in the TTBA in 2018.
- d. Please explain if the 826 refusals recorded in the data request response refer to the "approximately 1000 customer refusals" mentioned above in the testimony.

SDG&E Response 6:

SDG&E objects to this request on the grounds set forth in General Objections Nos. 5, 6 and 9. Subject to the foregoing objections, SDG&E responds as follows:

- a. SDG&E estimates the number of refusals in 2019 associated with the pursual of greater clearances was approximately 25% of the total or 206.
- b. Customer refusals are a multi-step process and may include the involvement of multiple individuals including pre-inspection, tree trim, and internal SDG&E staff and require multiple visits and hours spent trying to resolve. The time contractors spend resolving refusals results in added cost because the time spent to resolve customer refusals is billed at an hourly rate. As noted in PubAdv-SDGE-001-RYD Question 4d, calculations for cost associated with customer refusals vary and may include: the amount of time and associated cost a contractor spends trying to resolve a refusal, administrative costs for processing certified letters to document refusal, lost production time for the tree contractors, and incremental time needed for the tree contractor to return to a refusal property. SDG&E does not track and record specific costs, or the costs associated with specific customer refusals.

PUBLIC ADVOCATES OFFICE DATA REQUEST

SDG&E TTBA – A.20-07-003

DATE RECEIVED: SEPTEMBER 2, 2020

DATE RESPONDED: OCTOBER 23, 2020

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- c. SDG&E would estimate the portion of the 2019 TTBA cost increase that was driven by customer refusals is less than one (1) percent. SDG&E estimates the total cost of customer refusals recorded in the TTBA in 2018 to be \$234,600; and the total cost of customer refusals in 2019 to be \$276,500.

- d. The 826 refusals recorded in the data response was the estimated total of refusals that were recorded within the year 2019.

Exhibit 15

DR: PubAdv-SDG&E-005-RYD, dated September 25, 2020



Public Advocates Office
California Public Utilities Commission

505 Van Ness Avenue
San Francisco, CA 94102

<http://publicadvocates.cpuc.ca.gov>

DATA REQUEST
San Diego Gas & Electric Company Tree Trimming Balancing Account
A.20-07-003

Origination Date: September 25, 2020

Responses Due: October 9, 2020

To: Norma G. Jasso, njasso@semprautilities.com
Laura M. Fulton, lfulton@sdge.com

From: Tamera Godfrey, Project Coordinator
Public Advocates Office
505 Van Ness Avenue, Room 4104
San Francisco, CA 94102 tlg@cpuc.ca.gov

Originated by: Ryan Andresen
Phone: 415-703-3089
Email: Ryan.Andresen@cpuc.ca.gov

Data Request No: PubAdv-SDG&E-005-RYD
Exhibit Reference: Exhibit SDG&E-01 & SDG&E Response to PUBADV-SDG&E-DR-001-RYD

SDG&E Witness: Various
Subject: Tree Trimming Balancing Account (TTBA)

1. Referring to "2019 TTBA O&M by categoryDR1Q1.xlsx" from SDG&E's response to Data Request PUBADV-SDG&E-DR-001-RYD, question 1, provide the cost of each line item (column A, row 8-19) that is attributed to the \$10.4 million undercollection.
2. Referring to "2019 TTBA O&M by categoryDR1Q1.xlsx" from SDG&E's response to Data Request PUBADV-SDG&E-DR-001-RYD, question 1, provide the following:
 - a. In an Excel spreadsheet, further break down the line item "Tree Trimming" (cell A18) by tree trimming activity. Ensure the line-item breakdown includes all tree trimming activities referenced in Exhibit SDG&E-01, including, but not limited to, expanded clearances, hazard tree removal, customer refusals, and enhanced audit.
 - b. For each tree trimming category broken down in 2a, list both the total cost of the activity in 2019 and the cost of each activity that is attributed to the \$10.4 million undercollection.

- c. For each tree trimming category broken down in 2a, list the amount of the total cost associated with "Reliability" tree trims, and separate the amount associated with "Routine" tree trims.

END OF REQUEST

INSTRUCTIONS

You are instructed to answer the Data Requests in the above-captioned proceeding, with written, verified responses pursuant to Public Utilities Code §§ 309.5, 314, 314.5, 581 and 582, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. If you have any questions regarding this data request, please contact the Originator at the email address or phone number above.

Each Data Request is continuing in nature such that if any information provided changes, or new information becomes available that is responsive to a request, respondent is required to supplement its response to the Public Advocates Office. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Originator and Project Coordinator(s) as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. All data responses need to have each page numbered, referenced, and indexed so worksheets can be followed. If any numbers are calculated, include a copy of all supporting electronic files, with data and formulas intact and functioning, so that the formula and their sources can be reviewed. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word or Excel format, send the Word document or Excel file and do not send the information only as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible.

Documents produced in response to the data requests should be numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by page numbers.

If a request, definition, or an instruction, is unclear, notify the data request Originator and the Project Coordinator(s) as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Provide two copies of the above information as it becomes available but no later than the due date identified above. Provide electronic responses and set of hard copy responses with your submittal to the data request Originator and the Project Coordinator(s).

Exhibit 16

SDG&E DR responses dated October 23, 2020

PUBLIC ADVOCATES OFFICE DATA REQUEST

SDG&E TTBA – A.20-07-003

DATE RECEIVED: SEPTEMBER 25, 2020

DATE RESPONDED: OCTOBER 23, 2020

PubAdv-SDG&E-005-RYD

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

PUBLIC ADVOCATES OFFICE DATA REQUEST

SDG&E TTBA – A.20-07-003

DATE RECEIVED: SEPTEMBER 25, 2020

DATE RESPONDED: OCTOBER 23, 2020

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burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

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.

PUBLIC ADVOCATES OFFICE DATA REQUEST

SDG&E TTBA – A.20-07-003

DATE RECEIVED: SEPTEMBER 25, 2020

DATE RESPONDED: OCTOBER 23, 2020

PubAdv-SDG&E-005-RYD

III. RESPONSES

SDG&E requests confidential treatment of the documents identified in the files marked CONFIDENTIAL. SDG&E has further identified those files in highlighted text below. Please see the attached declaration of Jonathan Woldemariam.

Data Request No: PubAdv-SDG&E-005-RYD

Exhibit Reference: Exhibit SDG&E-01 & SDG&E Response to PUBADV-SDG&E-DR-001-RYD

1. Referring to “2019 TTBA O&M by categoryDR1Q1.xlsx” from SDG&E’s response to Data Request PUBADV-SDG&E-DR-001-RYD, question 1, provide the cost of each line item (column A, row 8-19) that is attributed to the \$10.4 million undercollection.

SDG&E Response 1:

SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 3, 6, and 9. Subject to the foregoing objections, SDG&E response as follows:

Please see document titled “2017 - 2019 TTBA O&M by categoryDR1Q1-Supplemental.xlsx” provided in SDG&E’s supplemental response to PubAdv-SDGE-001-RYD. All line items are attributed to the \$10.4 million undercollection. SDG&E has provided further descriptions of cost increases and increased workload associated with the 2019 undercollection in prior data request responses. See, e.g. SDG&E’s response to PubAdv-SDG&E-004-RYD Question 2a.

PUBLIC ADVOCATES OFFICE DATA REQUEST

SDG&E TTBA – A.20-07-003

DATE RECEIVED: SEPTEMBER 25, 2020

DATE RESPONDED: OCTOBER 23, 2020

PubAdv-SDG&E-005-RYD

2. Referring to “2019 TTBA O&M by categoryDR1Q1.xlsx” from SDG&E’s response to Data Request PUBADV-SDG&E-DR-001-RYD, question 1, provide the following:
 - a. In an Excel spreadsheet, further break down the line item “Tree Trimming” (cell A18) by tree trimming activity. Ensure the line-item breakdown includes all tree trimming activities referenced in Exhibit SDG&E-01, including, but not limited to, expanded clearances, hazard tree removal, customer refusals, and enhanced audit.
 - b. For each tree trimming category broken down in 2a, list both the total cost of the activity in 2019 and the cost of each activity that is attributed to the \$10.4 million undercollection.
 - c. For each tree trimming category broken down in 2a, list the amount of the total cost associated with “Reliability” tree trims, and separate the amount associated with “Routine” tree trims.

SDG&E Response 2:

SDG&E objections to this question the grounds set forth in General Objections Nos. 2, 3, 6, and 9. Subject to the foregoing objections, SDG&E replies as follows:

- a. Please refer to file titled "2019 TTBA O&M by categoryDR1Q1.xlsx" (provided in SDG&E’s response to PubAdv-SDGE-001-RYD, Question 1) rows 79-100.
- b. There is no single, specific tree-trimming activity attributed to the \$10.4 million undercollection. The 2019 TTBA undercollection is attributed to a number of factors detailed in SDG&E’s application, including increased labor costs; increases in costs related to hazard tree trimming and removals, including both increased workloads due to the number of trees and increased T&E rates; enhanced inspection activities; increased post-trim clearances for high-risk trees in the HFTD; implementation of outsourced tree crews to address labor shortages and meet vegetation management deadlines; cost conversion from fixed unit rates to Time & Equipment; and increased overtime costs and additional need for labor performed at overtime rates. See also, SDG&E’s response to PubAdv-SDG&E-004-RYD Question 2a.

The breakdown of the tree trimming activities in 2a was previously provided in DR3 Q1a and Q1g and DR4 Q4b. Tree trimming costs include costs detailed in the file titled "2019 TTBA O&M by categoryDR1Q1.xlsx" (provided in SDG&E’s response to PubAdv-SDGE-001-RYD, Question 1) includes costs associated with expanded clearances and hazard tree removal.

PUBLIC ADVOCATES OFFICE DATA REQUEST

SDG&E TTBA – A.20-07-003

DATE RECEIVED: SEPTEMBER 25, 2020

DATE RESPONDED: OCTOBER 23, 2020

PubAdv-SDG&E-005-RYD

Customer refusals -

2019 Refusals	Est. Average/Cost/Refusal	Total
826	\$300.00	\$247,800

Enhanced audits/inspections -

Additional Patrol Hours	Hourly Rate	Total
2856	\$69.19	\$197,607

c. Please see attached titled [REDACTED]

Exhibit 17

DR: Follow up Emails dated October 27, 28, 2020

Jasso, Norma G

From: Jasso, Norma G
Sent: Wednesday, October 28, 2020 2:23 PM
To: Andresen, Ryan
Cc: Fulton, Laura M; Van Geffen, John T.; Godfrey, Tamera
Subject: RE: A.20-07-003, Public Advocates Office Tree Trimming Balancing Account data request PubAdv-SDG&E-004-RYD and PubAdv-SDG&E-005-RYD
Attachments: 2019 TTBA O&M by categoryDR1Q1.xlsx

Hi Ryan.

I think you might be looking at the wrong file. The file you provided a screenshot of is titled “2019 TTBA O&M by categoryDR1Q1 - Supplemental.xlsx.” Attached is “2019 TTBA O&M by categoryDR1Q1.xlsx” which SDG&E provided in response to the first data request. If you have further difficulties locating the data referenced in SDG&E’s responses, please let me know.

As to the TTBA forecast, SDG&E does not maintain it by category.

Regards,
Norma

From: Andresen, Ryan <Ryan.Andresen@cpuc.ca.gov>
Sent: Tuesday, October 27, 2020 4:41 PM
To: Jasso, Norma G <NJasso@semprautilities.com>
Cc: Fulton, Laura M <LFulton@sdge.com>; Van Geffen, John T. <John.VanGeffen@cpuc.ca.gov>; Godfrey, Tamera <tamera.godfrey@cpuc.ca.gov>
Subject: [EXTERNAL] Re: A.20-07-003, Public Advocates Office Tree Trimming Balancing Account data request PubAdv-SDG&E-004-RYD and PubAdv-SDG&E-005-RYD

*** EXTERNAL EMAIL - Be cautious of attachments, web links, and requests for information ***

Hi Norma,

Referring to the responses to PubAdv-SDG&E-005-RYD, questions 1 and 2b, did SDG&E maintain any categorized forecast of 2019 TTBA costs to see where costs were higher than forecasted?

Additionally, the response to question 2a references rows 79-100 in “2019 TTBA O&M by categoryDR1Q1.xlsx,” but these rows are below the table and do not have any data. A screenshot of this table is below. Could you please provide the breakdown of tree trimming categories that SDG&E is referencing here?

	A	B	C	D	E	F	G	H	
1	SAN DIEGO GAS & ELECTRIC								
2	TREE TRIMMING BALANCING ACCOUNT (TTBA) - O&M BY CATEGORY								
3	2019								
4									
5									
6	Sum of Val/COArea Crcty	Column Labels ▼							
7	Row Labels ▼	1	2	3	4	5	6	7	
8	Admin	24,047	(2,697)	6,586	10,863	13,398	8,269	7,821	
9	Cash Discounts	(2,544)	(5,234)	(4,886)	(3,323)	(6,490)	(3,148)	(3,972)	
10	Catering	642	214	238	216	250		228	
11	Consulting	24,397	2,916			4,225	8,820	(8,325)	1
12	Employee Recognition								
13	Employee Travel	322			425	3,880		580	
14	Field Hardware and Software Support	1,293	200	64,500	(64,203)	2,037	64,597	2,426	
15	Labor	51,696	95,481	92,744	106,675	116,175	91,495	97,175	11
16	Meals & Entertainment	91				287		220	
17	Office Supplies/Office Equipment	213	551	566	648	891	288	463	
18	Tree Trimming	905,805	1,370,548	2,962,521	3,246,960	2,797,156	3,682,765	1,853,058	1,36
19	Vacation & Sick Overheads	8,481	15,363	15,120	17,510	18,975	14,960	15,662	1
20	Grand Total	1,014,444	1,477,342	3,137,389	3,315,772	2,950,784	3,868,045	1,965,338	1,51
21									
22									
23									
24									
25									
26									
27									
28									

Thank you,
Ryan

Exhibit 18

DR: PubAdv-SDG&E-006-RYD dated October 30, 2020



Public Advocates Office
California Public Utilities Commission

505 Van Ness Avenue
San Francisco, CA 94102

<http://publicadvocates.cpuc.ca.gov>

DATA REQUEST
San Diego Gas & Electric Company Tree Trimming Balancing Account
A.20-07-003

Origination Date: October 30, 2020

Responses Due: November 9, 2020

To: Norma G. Jasso, njasso@semprautilities.com
Laura M. Fulton, lfulton@sdge.com

From: Tamera Godfrey, Project Coordinator
Public Advocates Office
505 Van Ness Avenue, Room 4104
San Francisco, CA 94102 tlg@cpuc.ca.gov

Originated by: Ryan Andresen
Phone: 415-703-3089
Email: Ryan.Andresen@cpuc.ca.gov

Data Request No: PubAdv-SDG&E-006-RYD
Exhibit Reference:

SDG&E Witness: Various
Subject: Tree Trimming Balancing Account (TTBA)

1. Referring to "2017 - 2019 TTBA O&M by categoryDR1Q1 - Supplemental.xlsx" from SDG&E's supplemental response to PUBADV-SDG&E-DR-001-RYD, question 1, and SDG&E's response to PUBADV-SDG&E-DR-004-RYD, SDG&E recorded \$280,652.45 in admin expenses to CDCE Incorporated related to Panasonic Toughbook field computers.
 - a. Provide documentation that explains specifically why SDG&E recorded these field computers as admin expenses instead of recording them under field hardware and software support. Provided documentation that demonstrates if SDG&E's employees utilized these computers in the field for wildfire mitigation activities or if they were used by employees in support of on-going and routine activities.
 - b. Provide documentation that identifies specifically how many of these field computers are used by SDG&E employees and how many are used by contractors. Of the computers used by SDG&E employees, state in the response how many were used by new employees hired in 2019 for wildfire mitigation activities.
 - c. Provide documentation that explains in detail how SDG&E's employees use these field computers.

- d. Provide documentation that explains if SDG&E utilized Panasonic Toughbook field computers prior to 2019. Please explain the need for new field computers due to activities that occurred specifically in 2019. Please identify what technology was utilized for these activities in previous years before the field computers were purchased.
 - e. Provide documentation that SDG&E's management relied upon, prior to this data request, that determined the need for the purchase of Panasonic Toughbook field computers in 2019 and demonstrates that its field computers in use, prior to the purchase, were insufficient to address wildfire mitigation activities in 2019.
 - f. Provide documentation that explains and demonstrates if all the Panasonic Toughbook field computers purchased in 2019 were utilized for wildfire mitigation activities in 2019 or if some of the Panasonic Toughbook field computers purchased in 2019 were not used by SDG&E employees until 2020. Provide verifiable support for the response above.
2. The following refer to "2017 - 2019 TTBA O&M by categoryDR1Q1 - Supplemental.xlsx" from SDG&E's supplemental response to Data Request PUBADV-SDG&E-DR-001-RYD, question 1:
- a. Provide documentation that explains in detail and demonstrates specifically the activities that caused SDG&E's admin costs to increase by 206%, or \$172,542.52, between 2017 and 2019.
 - b. Provide documentation that explains and identifies all line items included in the recorded \$1,144,274.73 of labor costs in 2019. Identify separately the portion of the \$1,144,274.73 that is recorded for overtime (double time, triple time, etc.), vacation, leave, and sick time.
 - c. The line items for labor include the following categories: SAL-CLERICAL/TEC T&H, SAL-CLERICAL/TECH DT, SAL-CLERICAL/TEXG ST, SAL-DEL LUNCH PREM, SALL-MGMT D/T, SAL-MGMT S/T, SAL-MGMT T&1/2, SAL-UNION D/T, SAL-UNION S/T, SAL-UNION T&1/2. Please provide a description of each of these categories.
 - d. Provide documentation that demonstrates the amount directly associated with newly hired employees in 2019 that is included in the labor amount of \$1,144,274.73.
 - e. Provide documentation that explains the purpose of the \$1,014 recorded in Meals & Entertainment and the \$3,177 recorded in Catering.
 - f. Provide documentation that Identifies the portion of the \$183,034 recorded in Vacation & Sick Overheads that is associated with SDG&E existing employees that were included in authorized funding in SDG&E's last GRC.
 - g. Specifically identify each activity associated with the 17 costs recorded as Consulting in 2019. Why did consulting expenses increase by 84.6% from 2018?
3. Referring to "2017 - 2019 TTBA O&M by categoryDR1Q1 - Supplemental.xlsx" from SDG&E's supplemental response to Data Request PUBADV-SDG&E-DR-001-RYD, question 1, SDG&E recorded \$32,271,592 for tree trimming.

- a. Identify the total number of trees trimmed in 2018 and 2019 (including reliability, routine, etc.).
 - b. Identify the total number of trees inspected in 2018 and 2019 (including reliability, routine, etc.).
 - c. Identify the total number of trees removed in 2018 and 2019 (including reliability, routine, etc.).
4. Referring to SDG&E's supplemental response to PUBADV-SDG&E-DR-001-RYD, question 3, 8,497 hazard/reliability trees were trimmed in 2017, 11,863 in 2018, and 18,369 in 2019.
- a. Please provide the number of routine tree trims in each year (2017, 2018, and 2019.)
 - b. Please provide the total cost of trimming 18,369 hazard/reliability trees in 2019 and the total cost of trimming 11,863 hazard/reliability trees in 2018.
 - c. Provide the total cost of trimming routine trees in 2019 and the total cost of trimming routine trees in 2018.
5. Referring to SDG&E's supplemental response to PUBADV-SDG&E-DR-001-RYD, question 3, 6,874 hazard/reliability trees were inspected in 2017, 15,361 in 2018, and 20,995 in 2019.
- a. Please provide the number of routine tree inspections in each year (2017, 2018, and 2019.)
 - b. Please provide the total cost of inspecting 20,995 hazard/reliability trees in 2019 and the total cost of inspecting 15,361 hazard/reliability trees in 2018.
 - c. Provide the total cost of inspecting routine trees in 2019 and the total cost of inspecting routine trees in 2018.
6. Referring to SDG&E's supplemental response to PUBADV-SDG&E-DR-001-RYD, question 3, 540 hazard/reliability trees were removed in 2017, 491 in 2018, and 509 in 2019.
- a. Please provide the number of routine tree removals in each year (2017, 2018, and 2019.)
 - b. Provide the total cost of removing routine trees in 2019 and the total cost of removing routine trees in 2018.

END OF REQUEST

INSTRUCTIONS

You are instructed to answer the Data Requests in the above-captioned proceeding, with written, verified responses pursuant to Public Utilities Code §§ 309.5, 314, 314.5, 581 and 582, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. If you have any questions

regarding this data request, please contact the Originator at the email address or phone number above.

Each Data Request is continuing in nature such that if any information provided changes, or new information becomes available that is responsive to a request, respondent is required to supplement its response to the Public Advocates Office. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Originator and Project Coordinator(s) as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. All data responses need to have each page numbered, referenced, and indexed so worksheets can be followed. If any numbers are calculated, include a copy of all supporting electronic files, with data and formulas intact and functioning, so that the formula and their sources can be reviewed. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word or Excel format, send the Word document or Excel file and do not send the information only as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible.

Documents produced in response to the data requests should be numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by page numbers.

If a request, definition, or an instruction, is unclear, notify the data request Originator and the Project Coordinator(s) as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Provide two copies of the above information as it becomes available but no later than the due date identified above. Provide electronic responses and set of hard copy responses with your submittal to the data request Originator and the Project Coordinator(s).

Exhibit 19

SDG&E DR responses dated November 9, 2020 (Q.3-6) and November 16, 2020 (Q.1-2)

PUBLIC ADVOCATES OFFICE DATA REQUEST

SDG&E TTBA – A.20-07-003

DATE RECEIVED: OCTOBER 30, 2020

DATE RESPONDED: NOVEMBER 9, 2020

PubAdv-SDG&E-006-RYD

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

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burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

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

1. Referring to “2017 - 2019 TTBA O&M by categoryDR1Q1 - Supplemental.xlsx” from SDG&E’s supplemental response to PUBADV-SDG&E-DR-001-RYD, question 1, and SDG&E’s response to PUBADV-SDG&E-DR-004-RYD, SDG&E recorded \$280,652.45 in admin expenses to CDCE Incorporated related to Panasonic Toughbook field computers.
 - a. Provide documentation that explains specifically why SDG&E recorded these field computers as admin expenses instead of recording them under field hardware and software support. Provided documentation that demonstrates if SDG&E’s employees utilized these computers in the field for wildfire mitigation activities or if they were used by employees in support of on-going and routine activities.
 - b. Provide documentation that Identifies specifically how many of these field computers are used by SDG&E employees and how many are used by contractors. Of the computers used by SDG&E employees, state in the response how many were used by new employees hired in 2019 for wildfire mitigation activities.
 - c. Provide documentation that explains in detail how SDG&E’s employees use these field computers.
 - d. Provide documentation that explains if SDG&E utilized Panasonic Toughbook field computers prior to 2019. Please explain the need for new field computers due to activities that occurred specifically in 2019. Please identify what technology was utilized for these activities in previous years before the field computers were purchased.
 - e. Provide documentation that SDG&E’s management relied upon, prior to this data request, that determined the need for the purchase of Panasonic Toughbook field computers in 2019 and demonstrates that its field computers in use, prior to the purchase, were insufficient to address wildfire mitigation activities in 2019.
 - f. Provide documentation that explains and demonstrates if all the Panasonic Toughbook field computers purchased in 2019 were utilized for wildfire mitigation activities in 2019 or if some of the Panasonic Toughbook field computers purchased in 2019 were not used by SDG&E employees until 2020. Provide verifiable support for the response above.

SDG&E Response 1:

Forthcoming.

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2. The following refer to “2017 - 2019 TTBA O&M by categoryDR1Q1 - Supplemental.xlsx” from SDG&E’s supplemental response to Data Request PUBADV-SDG&E-DR-001-RYD, question 1:
 - a. Provide documentation that explains in detail and demonstrates specifically the activities that caused SDG&E’s admin costs to increase by 206%, or \$172,542.52, between 2017 and 2019.
 - b. Provide documentation that explains and identifies all line items included in the recorded \$1,144,274.73 of labor costs in 2019. Identify separately the portion of the \$1,144,274.73 that is recorded for overtime (double time, triple time, etc.), vacation, leave, and sick time.
 - c. The line items for labor include the following categories: SAL-CLERICAL/TEC T&H, SAL-CLERICAL/TECH DT, SAL-CLERICAL/TEXG ST, SAL-DEL LUNCH PREM, SALL-MGMT D/T, SAL-MGMT S/T, SAL-MGMT T&1/2, SAL-UNION D/T, SAL-UNION S/T, SAL-UNION T&1/2. Please provide a description of each of these categories.
 - d. Provide documentation that demonstrates the amount directly associated with newly hired employees in 2019 that is included in the labor amount of \$1,144,274.73
 - e. Provide documentation that explains the purpose of the \$1,014 recorded in Meals & Entertainment and the \$3,177 recorded in Catering.
 - f. Provide documentation that Identifies the portion of the \$183,034 recorded in Vacation & Sick Overheads that is associated with SDG&E existing employees that were included in authorized funding in SDG&E’s last GRC.
 - g. Specifically identify each activity associated with the 17 costs recorded as Consulting in 2019. Why did consulting expenses increase by 84.6% from 2018?

SDG&E Response 2:

Forthcoming.

PUBLIC ADVOCATES OFFICE DATA REQUEST
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3. Referring to “2017 - 2019 TTBA O&M by categoryDR1Q1 - Supplemental.xlsx” from SDG&E’s supplemental response to Data Request PUBADV-SDG&E-DR-001-RYD, question 1, SDG&E recorded \$32,271,592 for tree trimming.
- a. Identify the total number of trees trimmed in 2018 and 2019 (including reliability, routine, etc.).
 - b. Identify the total number of trees inspected in 2018 and 2019 (including reliability, routine, etc.).
 - c. Identify the total number of trees removed in 2018 and 2019 (including reliability, routine, etc.).

SDG&E Response 3:

Please see table below representing the approximate totals in response to questions a-c.

Year	2018	2019
Inspections/Inventory	457,800	453,330
Trims	175,989	161,921
Removals	8,105	9,008

PUBLIC ADVOCATES OFFICE DATA REQUEST

SDG&E TTBA – A.20-07-003

DATE RECEIVED: OCTOBER 30, 2020

DATE RESPONDED: NOVEMBER 9, 2020

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4. Referring to SDG&E’s supplemental response to PUBADV-SDG&E-DR-001-RYD, question 3, 8,497 hazard/reliability trees were trimmed in 2017, 11,863 in 2018, and 18,369 in 2019.
- a. Please provide the number of routine tree trims in each year (2017, 2018, and 2019.)
 - b. Please provide the total cost of trimming 18,369 hazard/reliability trees in 2019 and the total cost of trimming 11,863 hazard/reliability trees in 2018.
 - c. Provide the total cost of trimming routine trees in 2019 and the total cost of trimming routine trees in 2018.

SDG&E Response 4:

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

- a. SDG&E defines routine tree trims as those that were identified to be pruned during pre-inspection but were not coded as hazard/reliability. The following table represents the number of routine trims in years 2017-2019.

Year	2017	2018	2019
Routine Trims	147,284	164,126	143,552

- b. SDG&E defines hazard/reliability tree trims as those that were identified to be pruned for reliability during pre-inspection. The following table represents approximate cost of reliability trims billed at contractual fixed unit cost rates in 2018 and 2019, as invoiced by the tree contractors. These values do not include additional costs for reliability tree trims that were completed and invoiced under the time & equipment (T&E) rate. SDG&E does not separately track T&E costs for hazard/reliability trims from other T&E tree-trimming costs. Please see SDG&E response in DR4, Q2a for additional explanation.

Year	2018	2019
Reliability Trim Cost	2,312,114	4,450,118

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SDG&E TTBA – A.20-07-003
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SDG&E Response 4 (continued):

- c. SDG&E provides the following table reflecting the approximate cost for routine tree trims in years 2018 and 2019. These values reflect the approximate fixed, unit cost invoiced by the tree contractors. These values do not include additional costs for routine tree trims that were completed and invoiced under the time & equipment rate. SDG&E does not separately track T&E costs for hazard/reliability trims from other T&E tree-trimming costs. Please see SDG&E response in DR4, Q2a for additional explanation.

Year	2018	2019
Routine Trim Cost	10,472,970	11,102,047

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5. Referring to SDG&E’s supplemental response to PUBADV-SDG&E-DR-001-RYD, question 3, 6,874 hazard/reliability trees were inspected in 2017, 15,361 in 2018, and 20,995 in 2019.
- a. Please provide the number of routine tree inspections in each year (2017, 2018, and 2019.)
 - b. Please provide the total cost of inspecting 20,995 hazard/reliability trees in 2019 and the total cost of inspecting 15,361 hazard/reliability trees in 2018.
 - c. Provide the total cost of inspecting routine trees in 2019 and the total cost of inspecting routine trees in 2018.

SDG&E Response 5:

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

- a. SDG&E defines routine tree inspections as any inspection activity which occurs during the routine annual cycle. The chart below includes all trees inspected during the routine annual cycle, regardless of whether the inspections resulted in a designation of hazard/reliability or another designation. The value reflects the total estimated number of inventory trees for the year.

Year	2017	2018	2019
Inspections/Inventor	455,250	457,800	453,330

- b. Pre-inspection invoicing is structured under an hourly format and not done on a per-tree basis. SDG&E does not record and track separately the cost of pre-inspection based on the individual tree nor on the results of the inspection. A tree inspection which results in a reliability determination would typically require more time to complete; however, neither SDG&E nor its contractors currently differentiate between the cost of an inspection that results in reliability vs. routine work.

SDG&E provides the following table of the approximate total spend for all tree inspections in years 2018 and 2019.

Year	2018	2019
Pre-Inspection annual cost	\$4,555,892	\$5,243,699

- c. See answer b above.

PUBLIC ADVOCATES OFFICE DATA REQUEST
SDG&E TTBA – A.20-07-003
DATE RECEIVED: OCTOBER 30, 2020
DATE RESPONDED: NOVEMBER 9, 2020
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6. Referring to SDG&E’s supplemental response to PUBADV-SDG&E-DR-001-RYD, question 3, 540 hazard/reliability trees were removed in 2017, 491 in 2018, and 509 in 2019.
- a. Please provide the number of routine tree removals in each year (2017, 2018, and 2019.)
 - b. Provide the total cost of removing routine trees in 2019 and the total cost of removing routine trees in 2018.

SDG&E Response 6:

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

- a. SDG&E defines routine tree removals as those that are not coded during pre-inspection as hazard/reliability. The following table represents the approximate number of routine tree removals in years 2017-2019.

Year	2017	2018	2019
Routine Removals	6,649	7,614	8,499

- b. SDG&E provides the following table representing the approximate total cost for routine tree removals in years 2018 and 2019. These values reflect the total fixed, unit costs invoiced by the tree contractors. These values do not include additional costs for routine tree removals that were completed and invoiced under the T&E rate. SDG&E does not separately track T&E costs for tree removals from other T&E tree-trimming costs. Please see SDG&E response in DR4, Q2a for additional explanation.

Year	2018	2019
Routine Removal Cost	1,739,272	2,013,971

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SDG&E TTBA – A.20-07-003
DATE RECEIVED: OCTOBER 30, 2020
DATE RESPONDED: NOVEMBER 16, 2020
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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.

PUBLIC ADVOCATES OFFICE DATA REQUEST
SDG&E TTBA – A.20-07-003
DATE RECEIVED: OCTOBER 30, 2020
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III. RESPONSES

Question:

1. Referring to “2017 - 2019 TTBA O&M by categoryDR1Q1 - Supplemental.xlsx” from SDG&E’s supplemental response to PUBADV-SDG&E-DR-001-RYD, question 1, and SDG&E’s response to PUBADV-SDG&E-DR-004-RYD, SDG&E recorded \$280,652.45 in admin expenses to CDCE Incorporated related to Panasonic Toughbook field computers.
 - a. Provide documentation that explains specifically why SDG&E recorded these field computers as admin expenses instead of recording them under field hardware and software support. Provided documentation that demonstrates if SDG&E’s employees utilized these computers in the field for wildfire mitigation activities or if they were used by employees in support of on-going and routine activities.
 - b. Provide documentation that Identifies specifically how many of these field computers are used by SDG&E employees and how many are used by contractors. Of the computers used by SDG&E employees, state in the response how many were used by new employees hired in 2019 for wildfire mitigation activities.
 - c. Provide documentation that explains in detail how SDG&E’s employees use these field computers.
 - d. Provide documentation that explains if SDG&E utilized Panasonic Toughbook field computers prior to 2019. Please explain the need for new field computers due to activities that occurred specifically in 2019. Please identify what technology was utilized for these activities in previous years before the field computers were purchased.
 - e. Provide documentation that SDG&E’s management relied upon, prior to this data request, that determined the need for the purchase of Panasonic Toughbook field computers in 2019 and demonstrates that its field computers in use, prior to the purchase, were insufficient to address wildfire mitigation activities in 2019.
 - f. Provide documentation that explains and demonstrates if all the Panasonic Toughbook field computers purchased in 2019 were utilized for wildfire mitigation activities in 2019 or if some of the Panasonic Toughbook field computers purchased in 2019 were not used by SDG&E employees until 2020. Provide verifiable support for the response above.

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DATE RECEIVED: OCTOBER 30, 2020
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SDG&E Response 1:

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

It is not clear to SDG&E how Cal Advocates came about calculating \$280,652.45 as SDG&E's recorded admin expenses related to CDCE Incorporated. SDG&E's payments to CDCE Incorporated during 2019 totaled \$128,726 as shown in the image presented in response to Question 2a below.

- a. The allocation of 2019 field hardware cost was managed and approved by the IT project team and recorded correctly to the TTBA. To respond to Cal Advocates' previous data requests, SDG&E categorized the costs to Admin, however, the expense may have more appropriately been presented under the classification Field Hardware and Software Support in the referenced spreadsheet. SDG&E notes that these classifications were created in response to Cal Advocates' data requests related to this proceeding, and are not internal SDG&E classifications.

SDG&E Vegetation Management performs operations within its work management system called *PowerWorkz*. Both SDG&E contractors and internal staff use *Powerworkz* to schedule, document, and report all work activities. For example, the system is used to assign scheduling work orders, create and issue dispatch work orders, access the tree inventory database, and record data entries within the inventory tree records. The Panasonic Toughbook field computers are also issued to all internal Vegetation Management staff as their primary computing device to perform routine, daily activities and to access and work within the *PowerWorkz* application. SDG&E Vegetation Management provides the field computers to its contractors for the purpose of performing general work activities. The computers are not utilized exclusively for wildfire mitigation related activities.

- b. A total of fourteen (14) SDG&E employees utilize the field computers. A total of 237 contractors utilize field computers.
- c. The Panasonic Toughbook computers are the primary computing devices for SDG&E internal Vegetation Management employees. They are used for office work-related business and computer applications including the *PowerWorkz* work management system.
- d. SDG&E has used Panasonic Toughbook field computers since approximately 1999. Generally, the purchases for new field computers in 2019 were for additional contract crews brought on to support tree trimming operations that year. The computers purchased in 2019 were a next generation of the Panasonic Toughbook. They have a higher performing core processor and longer battery life than the preceding model.

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SDG&E Response 1 (continued):

- e. The cost of the purchase of new field computers in 2019 was related to the additional outsourced tree crews brought in to support vegetation management operations. These same computers will be used to support the increase in tree crews who remain on SDG&E property. A small percentage of the associated computer costs in 2019 were for repair and equipment replacement, but generally the computer purchases did not replace existing computers already in use. The computers are not utilized exclusively for wildfire mitigation related activities and support general tree trimming operations.
- f. All the field computers purchased in 2019 were utilized for both routine and wildfire mitigation activities.

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Question:

2. The following refer to “2017 - 2019 TTBA O&M by categoryDR1Q1 - Supplemental.xlsx” from SDG&E’s supplemental response to Data Request PUBADV-SDG&E-DR-001-RYD, question 1:
 - a. Provide documentation that explains in detail and demonstrates specifically the activities that caused SDG&E’s admin costs to increase by 206%, or \$172,542.52, between 2017 and 2019.
 - b. Provide documentation that explains and identifies all line items included in the recorded \$1,144,274.73 of labor costs in 2019. Identify separately the portion of the \$1,144,274.73 that is recorded for overtime (double time, triple time, etc.), vacation, leave, and sick time.
 - c. The line items for labor include the following categories: SAL-CLERICAL/TEC T&H, SAL-CLERICAL/TECH DT, SAL-CLERICAL/TEXG ST, SAL-DEL LUNCH PREM, SALL-MGMT D/T, SAL-MGMT S/T, SAL-MGMT T&1/2, SAL-UNION D/T, SAL-UNION S/T, SAL-UNION T&1/2. Please provide a description of each of these categories.
 - d. Provide documentation that demonstrates the amount directly associated with newly hired employees in 2019 that is included in the labor amount of \$1,144,274.73.
 - e. Provide documentation that explains the purpose of the \$1,014 recorded in Meals & Entertainment and the \$3,177 recorded in Catering.
 - f. Provide documentation that Identifies the portion of the \$183,034 recorded in Vacation & Sick Overheads that is associated with SDG&E existing employees that were included in authorized funding in SDG&E’s last GRC.
 - g. Specifically identify each activity associated with the 17 costs recorded as Consulting in 2019. Why did consulting expenses increase by 84.6% from 2018?

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SDG&E Response 2:

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

- a. The increase resulted primarily from the purchase of Panasonic Toughbooks. Refer to line 13 titled CDCE INCORPORATED of file "2019 TTBA O&M_ Category_ Detail_DR5_FollowUp.xlsx" (provided on November 2, 2020). SDG&E notes that the increase from 2018 to 2019 in the admin cost category—including the expenses related to CDCE Incorporated—is \$91,298 or 55%.

Following is partial image of file "2019 TTBA O&M_ Category_ Detail_DR5_FollowUp.xlsx"

1	SAN DIEGO GAS & ELECTRIC																
2	TREE TRIMMING BALANCING ACCOUNT (TTBA) - O&M BY CATEGORY																
3	2019																
4																	
5																	
6	Sum of Val/COArea Crcy	Color															
7	Row Labels		1	2	3	4	5	6	7	8	9	10	11	12	Total		
8	Admin		24,047	(2,697)	6,586	10,863	13,398	8,269	7,821	2,327	14,013	31,757	9,353	130,628	256,366		
9			3,279	1,123	7,699	5,541	6,985	5,141	2,919	621	8,622	10,455	343	7,514	60,243		
10	AECOM TECHNICAL SERVICES INC		4,736	(4,181)	(17,500)		191	170	149			18,612	688	892	3,757		
11	ANDERSON												1,560		1,560		
12	ANDERSON DIRECT & DIGITAL						1,023								1,023		
13	CDCE INCORPORATED		1,646	136	9,277			556		808		2,060	2,020	112,222	128,726		
14	CEATI INTERNATIONAL INC		8,500											10,000	18,500		

- b. Please see summary below:

SAL-MGMT S/T Total	932,098.42
SAL-MGMT T&1/2 Total	4,228.34
SAL-MGMT D/T Total	867.79
SAL-CLERICAL/TECH ST Total	72,036.98
SAL-CLERICAL/TEC T&H Total	6,351.56
SAL-CLERICAL/TECH DT Total	97.74
SAL-UNION S/T Total	73,990.09
SAL-UNION T&1/2 Total	7,902.26
SAL-UNION D/T Total	46,544.03
SAL-DEL LUNCH PREM Total	<u>157.52</u>
Grand Total	1,144,274.73

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SDG&E Response 2 (continued):

- c. **SAL-CLERICAL/TEC T&H** – Salaries – Clerical and Technical Time and One Half
SAL-CLERICAL/TECH DT – Salaries – Clerical and Technical Double Time
SAL-CLERICAL/TECH ST – Salaries – Clerical and Technical Straight-Time
SAL-DEL LUNCH PREM – Salaries – Delayed Lunch Premium
SAL-MGMT D/T – Salaries – Management Double Time
SAL-MGMT S/T – Salaries – Management Straight-Time
SAL-MGMT T&1/2 – Salaries Management Time and One Half
SAL-UNION D/T – Salaries – Union Double Time
SAL-UNION S/T – Salaries – Union Straight-Time
SAL-UNION T&1/2 – Salaries – Union Time and One Half

- d. Of the \$1,144,274.70, there was a total of \$76,760.41 of amounts charged relating to new employees that started in 2019.

Values	
Start Date	Sum of Val/COArea Crcy
1/14/2019	8327.26
1/7/2019	143.68
7/29/2019	18060.32
3/11/2019	49327.36
1/28/2019	119.04
9/23/2019	782.75
	76760.41

- e. SDG&E holds business meetings with its contractors to review schedule, work status, and processes. Some of these meetings may be held during meal times and are considered business expenses recorded under Meals & Entertainment. Vegetation Management holds monthly department staff meetings with internal personnel to discuss company business and Vegetation Management operations. These monthly meetings typically include food, and associated these expenses are recorded under Catering.

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SDG&E Response 2 (continued):

- f. The authorized vacation & sick funding in SDG&E's TY 2019 is \$183K. The amount is derived using a 4-year (2013 - 2016) average forecast methodology, escalated to 2016 dollars then to 2019 dollars. See details below.

TY 2019 Authorized Tree Trimming - Total O&M (In Thousands of Dollars)								
	2019 Base Forecast ^{1/}							
	Adjusted Recorded	V&S	Escalation	Total w V&S (2016 \$)	2019 Forecast Adjustment (2016 \$)	2019 Authorized (2016 \$) ^{2/}	2019 Authorized Esc rates ^{3/}	2019 Authorized (2019 \$)
	(a)	(b)	(c)	(d) = (a)+(b)+(c)	(e)	(f) = (d)+(e)	(g)	(h) = (f)*(g)
Labor	1,022	163	39	1,224	(84)	1,140	108.69%	1,239
Non-Labor	21,470		64	21,534		21,534	106.48%	22,929
Total	22,492	163	103	22,758	(84)	22,674		24,168
TY 2019 Authorized Tree Trimming - Labor (In Thousands of Dollars)								
	Labor	%	Escalation	Total Labor (2016\$)	2019 Forecast Adjustment (2016 \$)	2019 Authorized Labor (2016\$)	2019 Authorized Labor Esc Rate	2019 Authorized Labor (2019\$)
Adjusted Recorded	1,022	86%	34	1,055	(84)	971	108.69%	1,056
V&S	163	14%	5	168		168	108.69%	183
Total	1,185	100%	39	1,224	(84)	1,140		1,239
Notes:								
1/ Base forecast used a 4-Yr Average forecast methodology.								
2/ D. 19-09-051 Findings of Fact #115 at 738-739. Also see Exh. SDG&E-15-WP - Workpapers Of William H. Speer at 220-225.								
3/ Adopted escalation rates per D. 19-09-051 Findings of Fact #298 at 760. Also see Update Testimony III.A filed on August 2018.								

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SDG&E Response 2 (continued):

- g. Please see table below for consulting activities associated with Vegetation Management in 2019. Consulting services provided by FORENSIC ENTOMOLOGY and INSIGNIA ENVIRONMENTAL include biological review of work activities and on-site monitoring during work. ICON provides third-party tree crew safety observations in the field. OSCEOLA and UTILITY DATA CONTRACTORS provide GIS data services. Consulting expenses increased by 54.2% in 2019 due to the need for additional environmental and GIS services.

Fiscal Year	Cost element name	Val/COArea Crcy	Vendor Name
2019	SRV-CONSULTING-OTHER	3,000.00	FORENSIC ENTOMOLOGY
2019	SRV-CONSULTING-OTHER	4,000.00	FORENSIC ENTOMOLOGY
2019	SRV-CONSULTING-OTHER	8,721.00	INSIGNIA ENVIRONMENTAL
2019	SRV-CONSULTING-OTHER	8,676.00	INSIGNIA ENVIRONMENTAL
2019	SRV-CONSULTING-OTHER	2,916.00	INSIGNIA ENVIRONMENTAL
2019	SRV-CONSULTING-OTHER	4,000.00	FORENSIC ENTOMOLOGY
2019	SRV-CONSULTING-OTHER	90.00	INSIGNIA ENVIRONMENTAL
2019	SRV-CONSULTING-OTHER	135.00	INSIGNIA ENVIRONMENTAL
2019	SRV-CONSULTING	8,820.00	OSCEOLA CONSULTING LLC
2019	SRV-CONSULTING	(8,820.00)	OSCEOLA CONSULTING LLC UTILITY DATA CONTRACTORS INC
2019	SRV-CONSULTING	495.00	OSCEOLA CONSULTING LLC
2019	SRV-CONSULTING	8,820.00	OSCEOLA CONSULTING LLC
2019	SRV-CONSULTING	3,885.00	OSCEOLA CONSULTING LLC ICON BUILDING SUPPLIES, INC
2019	SRV-CONSULTING-OTHER	(1,950.00)	ICON BUILDING SUPPLIES, INC
2019	SRV-CONSULTING-OTHER	(4,658.00)	ICON BUILDING SUPPLIES, INC
2019	SRV-CONSULTING-OTHER	(9,680.00)	ICON BUILDING SUPPLIES, INC
2019	SRV-SOFTWR MAINT&LSE	2,940.00	OSCEOLA CONSULTING LLC
		31,390.00	

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Question:

3. Referring to “2017 - 2019 TTBA O&M by categoryDR1Q1 - Supplemental.xlsx” from SDG&E’s supplemental response to Data Request PUBADV-SDG&E-DR-001-RYD, question 1, SDG&E recorded \$32,271,592 for tree trimming.
 - b. Identify the total number of trees trimmed in 2018 and 2019 (including reliability, routine, etc.).
 - c. Identify the total number of trees inspected in 2018 and 2019 (including reliability, routine, etc.).
 - d. Identify the total number of trees removed in 2018 and 2019 (including reliability, routine, etc.).

SDG&E Response 3:

Provided November 9, 2020.

PUBLIC ADVOCATES OFFICE DATA REQUEST
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DATE RECEIVED: OCTOBER 30, 2020
DATE RESPONDED: NOVEMBER 16, 2020
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Question:

4. Referring to SDG&E's supplemental response to PUBADV-SDG&E-DR-001-RYD, question 3, 8,497 hazard/reliability trees were trimmed in 2017, 11,863 in 2018, and 18,369 in 2019.
 - a. Please provide the number of routine tree trims in each year (2017, 2018, and 2019.)
 - b. Please provide the total cost of trimming 18,369 hazard/reliability trees in 2019 and the total cost of trimming 11,863 hazard/reliability trees in 2018.
 - c. Provide the total cost of trimming routine trees in 2019 and the total cost of trimming routine trees in 2018.

SDG&E Response 4:

Provided November 9, 2020.

PUBLIC ADVOCATES OFFICE DATA REQUEST
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DATE RECEIVED: OCTOBER 30, 2020
DATE RESPONDED: NOVEMBER 16, 2020
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Question:

5. Referring to SDG&E's supplemental response to PUBADV-SDG&E-DR-001-RYD, question 3, 6,874 hazard/reliability trees were inspected in 2017, 15,361 in 2018, and 20,995 in 2019.
 - a. Please provide the number of routine tree inspections in each year (2017, 2018, and 2019.)
 - b. Please provide the total cost of inspecting 20,995 hazard/reliability trees in 2019 and the total cost of inspecting 15,361 hazard/reliability trees in 2018.
 - c. Provide the total cost of inspecting routine trees in 2019 and the total cost of inspecting routine trees in 2018.

SDG&E Response 5:

Provided November 9, 2020.

PUBLIC ADVOCATES OFFICE DATA REQUEST
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DATE RECEIVED: OCTOBER 30, 2020
DATE RESPONDED: NOVEMBER 16, 2020
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Question:

6. Referring to SDG&E's supplemental response to PUBADV-SDG&E-DR-001-RYD, question 3, 540 hazard/reliability trees were removed in 2017, 491 in 2018, and 509 in 2019.
 - a. Please provide the number of routine tree removals in each year (2017, 2018, and 2019.)
 - b. Provide the total cost of removing routine trees in 2019 and the total cost of removing routine trees in 2018.

SDG&E Response 6:

Provided November 9, 2020.

Exhibit 20

DR: PubAdv-SDG&E-007-RYD dated January 11, 2021



Public Advocates Office
California Public Utilities Commission

505 Van Ness Avenue
San Francisco, CA 94102

<http://publicadvocates.cpuc.ca.gov>

DATA REQUEST
San Diego Gas & Electric Company Tree Trimming Balancing Account
A.20-07-003

Origination Date: 11 January 2021

Responses Due: 26 January 2021

To: Norma G. Jasso, njasso@semprautilities.com
Laura M. Fulton, lfulton@sdge.com

From: Tamera Godfrey, Project Coordinator
Public Advocates Office
505 Van Ness Avenue, Room 4104
San Francisco, CA 94102
tamera.godfrey@cpuc.ca.gov

Originated by: Ryan Andresen
Phone: 415-703-3089
Email: Ryan.Andresen@cpuc.ca.gov

Data Request No: PubAdv-SDG&E-007-RYD
Exhibit Reference: SDG&E Rebuttal Testimony of Tyson Swetek

SDG&E Witness: Tyson Swetek
Subject: Tree Trimming Balancing Account (TTBA)

1. Referring to SDG&E's Rebuttal Testimony of Tyson Swetek, p. TS-3, line 2, SDG&E states, "SDG&E has continued to update the Commission and Wildfire Safety Division (WSD) – which now oversees WMP activities – on its EVM program, and data supporting the program, in various submissions, including its WMP quarterly updates, one of which included the submission of a comprehensive study to demonstrate the efficacy of post-trim clearances based on SDG&E's historical data."

Provide supporting documentation that SDG&E relied upon to determine that historical clearance expansions demonstrate the effectiveness of expanding clearances to 25-foot between certain trees in the HFTD and distribution facilities. Provide calculations and models utilized by SDG&E showing that the impacts of these smaller, historical clearance increases can be correlated with, and indicative of, expanding clearances to 25-foot for trees targeted by SDG&E's 2019 expanded clearance program.

2. Referring to SDG&E's Rebuttal Testimony of Tyson Swetek, p. TS-6, lines 4-7, SDG&E states, "Mr. Andresen dismisses the extensive analysis provided in SDG&E's 2020 WMP

Q3 Report and SDG&E data request responses that clearly, empirically, and quantitatively demonstrates the benefits of increasing clearances from SDG&E's required standard of 10-12 feet to 20-25 feet in the HFTD."

- a. Provide documentation that identifies and cites references in SDG&E's testimony, application, or data request responses provided to Cal Advocates (provided prior to SDG&E's rebuttal testimony), that specifically demonstrates and isolates the impact of expanding clearances to 25 feet from distribution facilities.
 - b. Provide documentation that identified data specifically isolating the impact of expanding clearances to 25 feet for trees targeted by the expanded clearance program; that is, trees within 25-feet of distribution lines in the HFTD that meet SDG&E's growth, pruning, and species criteria for expanded clearances.
3. Referring to SDG&E's Rebuttal Testimony of Tyson Swetek, p. TS-6, lines 21-24, SDG&E states, "Because the EVM program began in 2019, the benefits of the program would not have been expected to be realized until 2020 and would not be fully realized until all 80,000 trees identified were completed." Provide the following:
- a. Documentation identifying and referencing SDG&E's testimony, application, or data request responses to Cal Advocates (prior to SDG&E's rebuttal testimony) where SDG&E specifically discussed and supported its assertion that benefits of the expanded clearance program would not be realized until 2020.
 - b. Referring to SDG&E's Rebuttal Testimony of Tyson Swetek, p. TS-4, line 2, SDG&E began performing the work of the expanded clearance program in April 2019. Provide documentation that explains in detail why the benefits of expanding clearances to 25 feet, which began in April before the fire season, would not even be partially realized in 2019. Provide supporting documentation that demonstrates that SDG&E's 2019 expanded clearance program work did not result in any benefits in 2019.
 - c. The Cal Advocates tables referenced by SDG&E, Table 2-5, was created utilizing data provided by SDG&E in response to PubAdv-SDG&E-003-RYD, Question 1i, which asked, "Provide documentation SDG&E's management prepared and relied upon that demonstrates that increasing the clearance to 25-feet provides incremental risk reduction benefits. In the response include documentation identifying the incremental risk and that shows the calculation on the reduction benefits," and in response to Question 1k, which asked, "Provide documentation that SDG&E's management prepared, prior to this data request, and relied upon, that demonstrates the results of the effectiveness of expanding clearances to 25-feet in 2019."

Provide documentation that explains in detail why SDG&E utilized this data in response to a request for documentation demonstrating the effectiveness of expanding clearances to 25-feet, yet now claims the data on 2019 vegetation contacts reported by SDG&E does not demonstrate the effect of the program.

- d. Identify in SDG&E's response to Question 1i or 1k where SDG&E states that the provided 2019 vegetation contacts data does not demonstrate the effectiveness of the expanded clearance program.

4. Referring to SDG&E's Rebuttal Testimony of Tyson Swetek, p. TS-8, in the table titled, "Vegetation Contacts per 1000 Trees," SDG&E provides numbers of vegetation contacts without specifying whether the data isolates trees targeted by the expanded clearance program.

Provide documentation that explains in detail whether vegetation contacts in this table specifically relate to vegetation contacts from distribution facilities in the HFTD for trees targeted by the expanded clearance program. In the response explain why SDG&E uses "Greater than 20 ft" in its table when the expanded clearance program relates to clearances of 25-feet. Explain if any trees under the "Greater than 20 ft" data were not trees targeted by the expanded clearance program.

END OF REQUEST

INSTRUCTIONS

You are instructed to answer the Data Requests in the above-captioned proceeding, with written, verified responses pursuant to Public Utilities Code §§ 309.5, 314, 314.5, 581 and 582, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. If you have any questions regarding this data request, please contact the Originator at the email address or phone number above.

Each Data Request is continuing in nature such that if any information provided changes, or new information becomes available that is responsive to a request, respondent is required to supplement its response to the Public Advocates Office. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Originator and Project Coordinator(s) as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. All data responses need to have each page numbered, referenced, and indexed so worksheets can be followed. If any numbers are calculated, include a copy of all supporting electronic files, with data and formulas intact and functioning, so that the formula and their sources can be reviewed. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word or Excel format, send the Word document or Excel file and do not send the information only as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible.

Documents produced in response to the data requests should be numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by page numbers.

If a request, definition, or an instruction, is unclear, notify the data request Originator and the Project Coordinator(s) as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

Provide two copies of the above information as it becomes available but no later than the due date identified above. Provide electronic responses and set of hard copy responses with your submittal to the data request Originator and the Project Coordinator(s).

Exhibit 21

SDG&E responses dated January 26, 2021

PUBLIC ADVOCATES OFFICE DATA REQUEST

SDG&E TTBA – A.20-07-003

DATE RECEIVED: JANUARY 11, 2021

DATE RESPONDED: JANUARY 26, 2021

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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.

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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.

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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Exhibit Reference: SDG&E Rebuttal Testimony of Tyson Swetek

SDG&E Witness: Tyson Swetek

Subject: Tree Trimming Balancing Account (TTBA)

1. Referring to SDG&E’s Rebuttal Testimony of Tyson Swetek, p. TS-3, line 2, SDG&E states, “SDG&E has continued to update the Commission and Wildfire Safety Division (WSD) – which now oversees WMP activities – on its EVM program, and data supporting the program, in various submissions, including its WMP quarterly updates, one of which included the submission of a comprehensive study to demonstrate the efficacy of post-trim clearances based on SDG&E’s historical data.”

Provide supporting documentation that SDG&E relied upon to determine that historical clearance expansions demonstrate the effectiveness of expanding clearances to 25-feet between certain trees in the HFTD and distribution facilities. Provide calculations and models utilized by SDG&E showing that the impacts of these smaller, historical clearance increases can be correlated with, and indicative of, expanding clearances to 25-feet for trees targeted by SDG&E’s 2019 expanded clearance program.

SDG&E Response 1:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 5 and 6. Subject to the foregoing objections, SDG&E replies as follows:

The supporting documentation relied upon to produce the study was provided in Appendix B of SDG&E’s Rebuttal Testimony of Tyson Swetek (“Appendix B”). Appendix B is an excerpt of SDG&E’s Third Quarterly Report provided to the Wildfire Safety Division (“WSD”), addressing many of the same issues that Cal Advocates addresses in this data request. Cal Advocates, as an active participant in the WMP proceedings, commented on SDG&E’s Quarterly Report, and made recommendations specific to SDG&E’s enhanced vegetation management program and the 25-foot clearance for targeted species in the HFTD.

SDG&E’s Third Quarterly Report demonstrates that using historical data that without any filtering, increasing the clearance distance between electric conductors and vegetation of any species, in any area, reduces vegetation contact rates. As explained in the Report, the data was truncated to only capture vegetation contacts that had been trimmed prior to the outage, avoiding “fall in” trees or trees otherwise not in SDG&E’s inventory. That outage data was then broken up into contacts by post trim clearance distance. The next step was to capture the number of trees trimmed to the various clearance levels to understand the volume of trees at each clearance. Finally the average contacts are divided by the average completed trims to determine contact rates per 1000 trees. To better show the trend, the data was then grouped by clearances of less than 10’, 10’ – 12’, greater than 12’, and greater than 20’. This study was system wide and included all species.

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SDG&E did not filter this study for the specific species (Eucalyptus, Oak, Palm, Pine and Sycamore) or limit the area to the HFTD, which is the target of the enhanced vegetation management program. Again, the species were targeted as “high risk,” because they account for over 80% of all historical vegetation contacts. The enhanced vegetation management program targets the HFTD because should an ignition occur, the consequence of a fire is greater in the HFTD than the non HFTD.

SDG&E has been in the process of further refining its data to filter the study in Appendix B to only include the high risk species, and to only include contacts and completed trims located in the HFTD. The tables and graphs from the more targeted study have been provided in Attachment A at the end of this data request. Attachment A represents a preliminary draft of the study that SDG&E will provide to the WSD as part of its next Quarterly update in February 2021. SDG&E notes that from 2002-2020 there has not been a vegetation contact in the HFTD caused by one of the high risk species when the trees have been trimmed to 20’ clearance or greater.

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2. Referring to SDG&E’s Rebuttal Testimony of Tyson Swetek, p. TS-6, lines 4-7, SDG&E states, “Mr. Andresen dismisses the extensive analysis provided in SDG&E’s 2020 WMP Q3 Report and SDG&E data request responses that clearly, empirically, and quantitatively demonstrates the benefits of increasing clearances from SDG&E’s required standard of 10-12 feet to 20-25 feet in the HFTD.”
 - a. Provide documentation that identifies and cites references in SDG&E’s testimony, application, or data request responses provided to Cal Advocates (provided prior to SDG&E’s rebuttal testimony), that specifically demonstrates and isolates the impact of expanding clearances to 25 feet from distribution facilities.
 - b. Provide documentation that identified data specifically isolating the impact of expanding clearances to 25 feet for trees targeted by the expanded clearance program; that is, trees within 25-feet of distribution lines in the HFTD that meet SDG&E’s growth, pruning, and species criteria for expanded clearances.

SDG&E Response 2:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 5 and 6. Subject to the foregoing objections, SDG&E replies as follows:

- a. SDG&E’s responses to PUBADV – SDG&E-DR-003-RYD, questions i-k address SDG&E’s study to demonstrate the impact of expanded clearances. In those data request responses, SDG&E further noted that it planned to provide its study to “further demonstrate the efficacy of post trim clearances based on SDG&E’s historical data ... as part of SDG&E’s 2020 WMP Quarterly Report on September 9, 2020. As noted, SDG&E’s response to PUBADV – SDG&E-DR-003-RYD, question k, provided a preliminary description of its analysis. SDG&E also notes that Cal Advocates has actively participated in the ongoing WMP proceedings prior to this application, and continues to comment on the enhanced vegetation management program and other aspects of SDG&E’s WMP.
- b. As described in the response to Q1, the study provided in the quarterly report (and preliminarily addressed in PUBADV – SDG&E-DR-003 RYD) demonstrates the effectiveness for all trees in all areas. SDG&E has been in the process of further data refinements as part of its WMP update process, and intends to address the specificity sought by Cal Advocates in its February update. A preliminary version of the specific study being requested is provided in Attachment A at the end of this data request.

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3. Referring to SDG&E’s Rebuttal Testimony of Tyson Swetek, p. TS-6, lines 21-24, SDG&E states, “Because the EVM program began in 2019, the benefits of the program would not have been expected to be realized until 2020 and would not be fully realized until all 80,000 trees identified were completed.” Provide the following:

a. Documentation identifying and referencing SDG&E’s testimony, application, or data request responses to Cal Advocates (prior to SDG&E’s rebuttal testimony) where SDG&E specifically discussed and supported its assertion that benefits of the expanded clearance program would not be realized until 2020.

b. Referring to SDG&E’s Rebuttal Testimony of Tyson Swetek, p. TS-4, line 2, SDG&E began performing the work of the expanded clearance program in April 2019. Provide documentation that explains in detail why the benefits of expanding clearances to 25 feet, which began in April before the fire season, would not even be partially realized in 2019. Provide supporting documentation that demonstrates that SDG&E’s 2019 expanded clearance program work did not result in any benefits in 2019.

c. The Cal Advocates tables referenced by SDG&E, Table 2-5, was created utilizing data provided by SDG&E in response to PubAdv-SDG&E-003-RYD, Question 1i, which asked, “Provide documentation SDG&E’s management prepared and relied upon that demonstrates that increasing the clearance to 25-feet provides incremental risk reduction benefits. In the response include documentation identifying the incremental risk and that shows the calculation on the reduction benefits,” and in response to Question 1k, which asked, “Provide documentation that SDG&E’s management prepared, prior to this data request, and relied upon, that demonstrates the results of the effectiveness of expanding clearances to 25-feet in 2019.”

Provide documentation that explains in detail why SDG&E utilized this data in response to a request for documentation demonstrating the effectiveness of expanding clearances to 25-feet, yet now claims the data on 2019 vegetation contacts reported by SDG&E does not demonstrate the effect of the program.

d. Identify in SDG&E’s response to Question 1i or 1k where SDG&E states that the provided 2019 vegetation contacts data does not demonstrate the effectiveness of the expanded clearance program.

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SDG&E Response 3:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 3, 5, and 6. Subject to the foregoing objections, SDG&E replies as follows:

- a. Logically, the benefits of a program will not be “fully realized” until a program is in effect and can be measured over prior years (years when the program is not in effect). Cal Advocates, in their testimony, point to the annual total contacts in 2019 and the total trees trimmed that year to 20-30’ and infer the program was ineffective. SDG&E’s rebuttal testimony addresses the fact that because the trees are trimmed throughout the year, and since the program didn’t start until April, and there is a ramp up period to the activity, the majority of trees would be trimmed later in the year. Using only data that encompasses all trees trimmed in 2019 and pointing to the total outages for the year is misleading as to the program’s efficacy, because it dilutes the program impact. SDG&E anticipates that the total trees trimmed (last trees trimmed in December) value wouldn’t have its full risk reduction effect until 2020, meaning all trees have been trimmed to that level by December 31st 2019 so in 2020 SDG&E would see the full benefits from those trims.
- b. As each tree is trimmed, those incremental benefits are realized for the rest of the duration of 2019, so that 2019 outage number did include partial benefits from the program. But since we are using the resolution of a full year and not month by month data, it is difficult to say without the benefit of more data how effective the trees trimmed in 2019 were at impacting the 2019 total contact data.
- c. SDG&E provided the graph in PUBADV – SDG&E-003-RYD, Question 1.i to demonstrate the past success SDG&E experienced in reduced vegetation contacts when it increased post trim clearance from 18” to 10-12’. The success was dramatic, which is why SDG&E believed that additionally increased clearances (particularly for high risk species) could once again reduce vegetation contacts from the current averages.

SDG&E is not claiming that the work completed in 2019 to increase clearances does not increase effectiveness. Quite the contrary, SDG&E believes its data, when properly analyzed, demonstrates that increased clearances reduce vegetation contacts. SDG&E addresses the issues with Cal Advocates’ analysis of the data in the Rebuttal Testimony of Tyson Swetek, specifically at TS-6 – TS-7. SDG&E is claiming that if 15,000 trees are trimmed by year end 2019, the full cumulative impact of all those trims cannot be realized or accurately measured until 2020. With the clearances fully in place for those hypothetical 15,000 trees, SDG&E now has a full dataset to measure whether, over the course of a full year, contacts on those previously trimmed trees are reduced.

- d. SDG&E believes the responses in i and k do demonstrate the effectiveness of enhanced clearances. See above.

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4. Referring to SDG&E's Rebuttal Testimony of Tyson Swetek, p. TS-8, in the table titled, "Vegetation Contacts per 1000 Trees," SDG&E provides numbers of vegetation contacts without specifying whether the data isolates trees targeted by the expanded clearance program.

Provide documentation that explains in detail whether vegetation contacts in this table specifically relate to vegetation contacts from distribution facilities in the HFTD for trees targeted by the expanded clearance program. In the response explain why SDG&E uses "Greater than 20 ft" in its table when the expanded clearance program relates to clearances of 25-feet. Explain if any trees under the "Greater than 20 ft" data were not trees targeted by the expanded clearance program.

SDG&E Response 4:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 5 and 6. Subject to the foregoing objections, SDG&E replies as follows:

Please see the response from Q1 and Q2.

SDG&E uses greater than 20' instead of 25' because that's the granularity with which it measures post trim clearance. Please see table SDGE-13 Table 22 in Appendix B. The column names capture the granularity in which SDG&E captures post trim clearance data. The enhanced clearance level would be the column 20' to 30'. SDG&E has been using the midpoint of this clearance level to describe the enhanced program as trimming to 25'.

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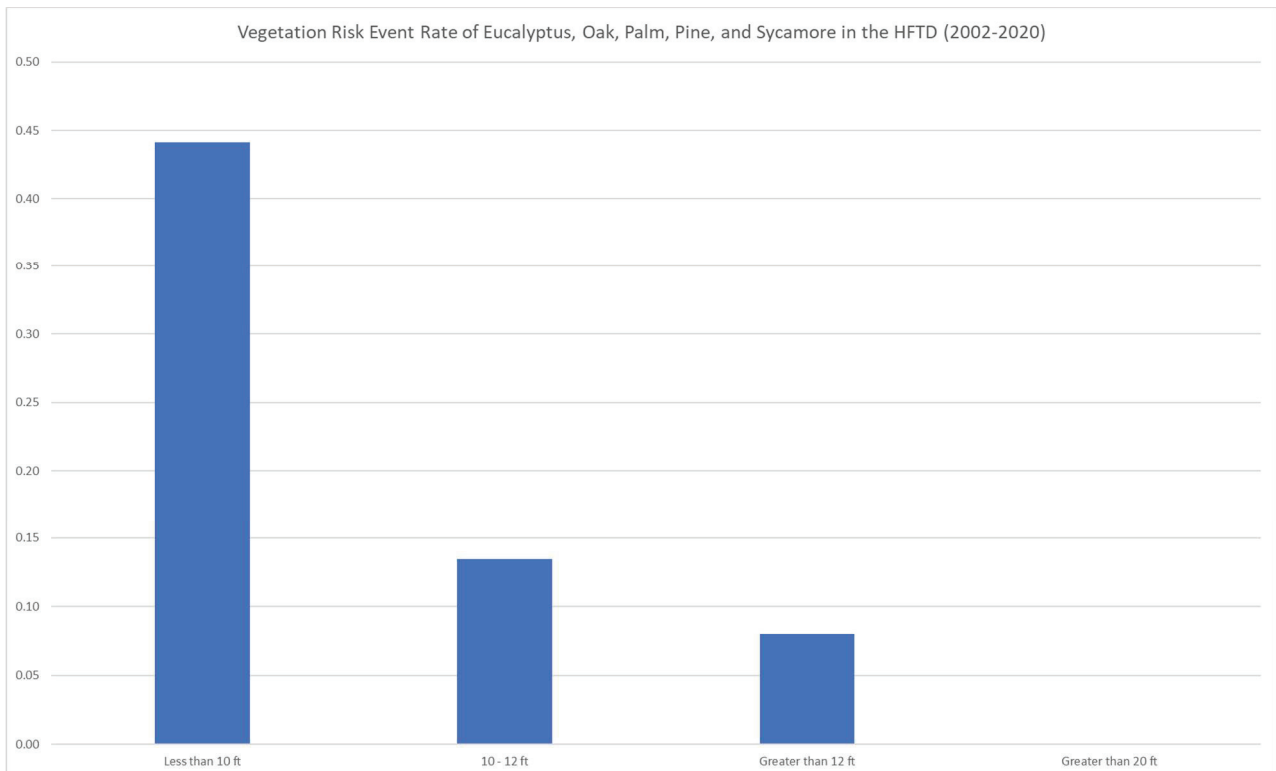
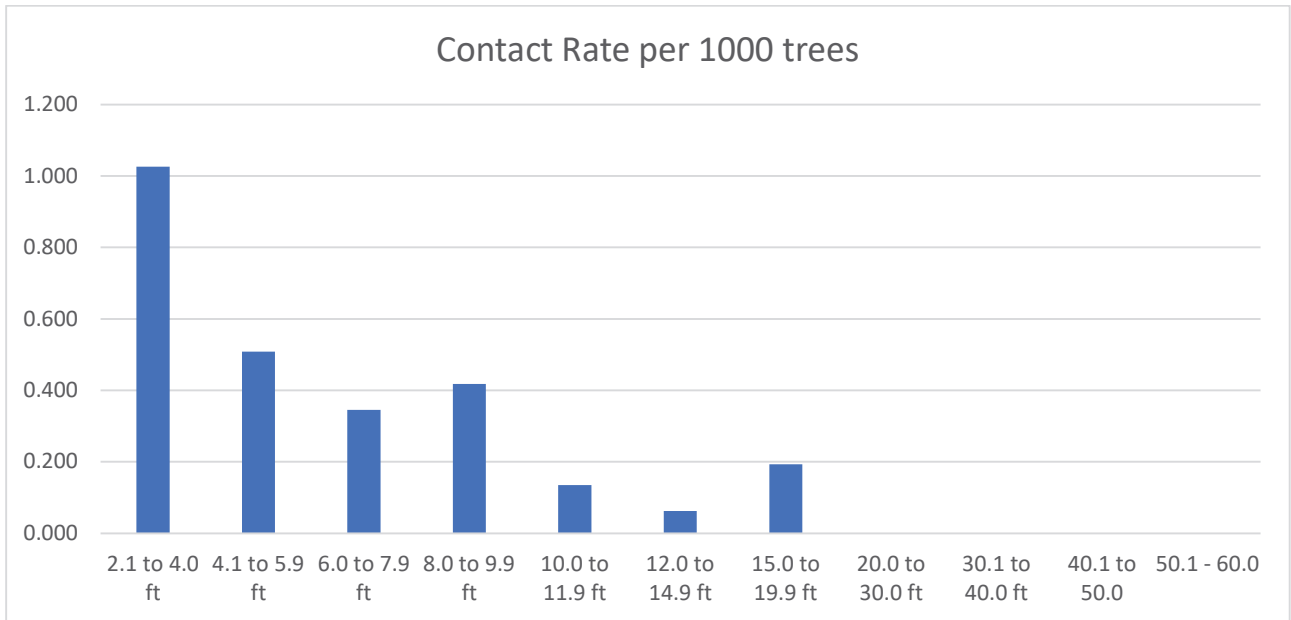
ATTACHMENT A

SDG&E Clearance study, updated to include 2020 data and filtered by Eucalyptus, Oak, Palm, Pine, and Sycamore located within the HFTD.

Outages by Post Trim Clearance											
Year	2.1 to 4.0	4.1 to 5.9	6.0 to 7.9	8.0 to 9.9	10.0 to 11.1	12.0 to 14.1	15.0 to 19.1	20.0 to 30.0	30.1 to 40.0	40.1 to 50.0	50.1 - 60.0
2002	1	2	0	4	4						
2003	0	2	2	3	5						
2004	0	0	1	2	3						
2005	0	1	0	1	4						
2006	0	0	0	1	19	0	0	0			
2007	0	0	0	0	11	1	0	0			
2008	1	0	0	1	5	0	0	0			
2009	0	0	0	0	10	0	1	0			
2010	0	0	0	0	11	0	2	0			
2011	0	0	0	0	5	0	0	0			
2012	0	0	0	0	3	1	0	0			
2013	0	0	0	0	1	1	0	0			
2014	0	0	0	0	6	0	0	0	0	0	0
2015	0	0	0	0	3	0	0	0	0	0	0
2016	0	0	0	0	5	0	2	0	0	0	0
2017	0	0	0	0	10	0	1	0	0	0	0
2018	0	0	0	0	5	0	0	0	0	0	0
2019	0	0	0	0	3	1	0	0	0	0	0
2020	0	0	0	0	3	0	0	0	0	0	0
Average c	0.1	0.3	0.2	0.6	6.3	0.3	0.4	0.0	0.0	0.0	0.0

Trees Trimmed to Clearance Levels											
Year	2.1 to 4.0	4.1 to 5.9	6.0 to 7.9	8.0 to 9.9	10.0 to 11.1	12.0 to 14.1	15.0 to 19.1	20.0 to 30.0	30.1 to 40.0	40.1 to 50.0	50.1 - 60.0
2002	88	576	2397	8869	41893						
2003	48	554	1221	4413	38687						
2004	41	889	779	884	67158						
2005	30	407	429	493	34340						
2006	39	471	454	605	40847	2052	556	308			
2007	27	330	230	479	36691	1745	429	671			
2008	21	354	227	213	34836	1110	1250	1993			
2009	21	434	152	234	43627	2089	1819	1999			
2010	16	337	103	203	43578	1808	849	2269			
2011	13	353	113	154	49252	4827	958	1939			
2012	13	340	87	144	51133	3797	1154	1312			
2013	8	278	57	77	44684	2685	1177	1188			
2014	19	352	205	1333	58786	4199	2250	1544	436	13	25
2015	47	279	171	1020	54440	4592	2363	1930	293	29	6
2016	38	348	141	1087	52806	5965	2995	2333	623	81	22
2017	30	300	158	1013	44494	4795	2565	1889	523	101	65
2018	503	1264	408	1895	54725	5951	2828	2912	633	181	25
2019	592	1342	679	2449	44410	8324	4357	5194	829	184	58
2020	464	1183	676	3138	50863	10751	5555	4908	820	215	84
Average	108.3158	546.8947	457.2105	1510.684	46697.37	4312.667	2073.667	2159.267	593.8571	114.8571	40.71429

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As SDG&E is moving from 10-12' clearances to 20' -30' clearances, SDG&E is reducing moving from .134 contacts per 1000 trees to 0 contacts per 1000 trees. Completing this program would reduce an estimated 6.3 vegetation caused risk events per year in the HFTD.