THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

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.

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.

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

III. RESPONSES

QUESTION 1

In Section 4.1.5 of SDG&E's 2022 WMP, titled "Vegetation Management and Inspections," SDG&E states "The fuels modification involves the mechanical thinning of vegetation in a 50-foot radius surrounding the poles."

a) In context of the above quote, does SDG&E perform any additional vegetation management, if there are trees greater than 50 feet tall that are outside of the 50-foot radius surrounding the poles?

b) If the answer is yes to part a), please explain the additional steps that SDG&E takes to assure that the trees outside of the 50-foot radius do not damage the pole.

RESPONSE 1

SDG&E objects to the question on the grounds stated forth in General Objections Nos. 2, 3, and 7. Subject to the foregoing objections, SDG&E responds as follows:

a) In the context of fuels modification involving mechanical thinning, the scope of the activity is limited to vegetation near ground level. This may include the removal of select lower branches of trees located within the 50-foot radius that could create "ladder fuels" during a fire. Taller trees outside the 50-foot radius are inspected during the routine and "off-cycle" HFTD inspection activities to determine risk to the power lines or poles.

b) N/A

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

QUESTION 2

In Section 4.1.5 of SDG&E's 2022 WMP, titled "Vegetation Management and Inspections," SDG&E states:

> In 2021 … A methodology was created to integrate the CRI and WRRM scores, poles with lower environmental impact, and poles that carry non-exempt hardware as the basis for where the activity would be performed. The initial analysis identified over 1100 poles that met the criteria. The number of actual poles cleared was dependent on customer authorization, site inspection, and environmental constraints.

Please provide the number of actual poles cleared in 2021 as referenced above.

RESPONSE 2

SDG&E objects to the question on the grounds stated forth in General Objections Nos. 2, 3, and 5. Subject to the foregoing objections, SDG&E responds as follows:

The number of poles cleared in 2021 for the fuels modification (thinning) project was 203.

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

QUESTION 3

In Table 1 of the February 11, 2022 non-spatial data (2022 WMP Attachment B), SDG&E provides "Recent performance on progress metrics." Please answer the following questions regarding rows in Table 1.

a. For Row 1.f, please explain the reasons for the increasing trend for the Level 1 findings in HFTD for other inspections in the last three quarters in 2021, compared to the first quarter in 2021?

b. For Row 1.i, please explain the reasons for the increasing trend for the Level 2 findings in HFTD for other inspections in the last two quarters in 2021, compared to the first two quarters in 2021?

c. For Row 1.j-l, please provide the reasons why Level 3 findings in HFTD are N/A.

d. For Row 1.g.ii, please explain the reasons why the Level 2 findings for detailed inspections - Distribution lines have a higher level in the last three quarters in 2021 compared to the previous three quarters (Q3, Q4 of 2020 and Q1 of 2021).

e. For Row 1.h.ii, please explain the reasons why the Level 2 findings for detailed inspections - Distribution lines in 2021 are approximately double the number in 2020.

f. For Row 1.i.ii, please explain the reasons for the increasing trend for the Level 2 findings for other inspections in the last two quarters in 2021.

g. For Row 1.j-l.ii, please provide the reasons why Level 3 findings in HFTD are N/A.

h. For Row 4.i, please explain the reason for the increasing trend for the Level 2 findings in HFTD for other inspections (Drone) - Distribution lines in the last two quarters in 2021.

i. For Row 4.j-l, please provide the reasons why Level 3 findings in HFTD for other inspections are N/A.

RESPONSE 3

SDG&E objects to the question on the grounds stated forth in General Objections Nos. 2, 3, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows:

a. 1.f. is a total of all other inspection level 1 findings, which are listed from 4.d. to 4.f.; this increase in level 1 finding is mainly driven by distribution drone inspections, which began in Q3 of 2021.
b. 1.i is a total of all other inspection level 2 findings, which are listed from 4.f. to 4.i; this increase in level 2 findings is driven by our drone inspections, which began in Q3 of 2021.

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

c. Based on our corrective maintenance timelines, SDG&E assigns infraction repair timelines consistent with the Level 2 timeline definition. SDG&E does not use the Level 3 designation at this time.
d. A calculation error occurred. The table below is the corrected values for 1.g.ii.

Q1 2021	Q2 2021	Q3 2021	Q4 2021
10	88	107	26

e. A calculation error occurred. The table below is the corrected values for 1.i.ii.

Q1 2021	Q2 2021	Q3 2021	Q4 2021
470	170	19	24

f. 1.i.ii is a total of all level 2 findings including those in the HFTD. This increase in level 2 findings is driven by our drone inspections, which began in Q3 of 2021.
g. Based on our corrective maintenance timelines, SDG&E assigns infraction repair timelines consistent with the Level 2 timeline definition. SDG&E does not use the Level 3 designation at this time.
h. Drone inspection started in Q3 2021 and circuit miles of drone inspection increased in Q4 2021 (see line # 4.c.). As a result, more level 2 findings in Q4 were observed.
i. Based on our corrective maintenance timelines, SDG&E assigns infraction repair timelines consistent with the Level 2 timeline definition. SDG&E does not use the Level 3 designation at this time.

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

QUESTION 4

On page (p.) 352 of SDG&E's 2022 WMP, SDG&E states that "Over 100 miles of overhead lines were hardened in 2021" with the goal to reduce wildfire risk and PSPS impacts. With this context:

(a) What is the expected reduction in number of PSPS events in 2022 because of SDG&E's system hardening in 2021?

(b) What is the expected reduction in customers impacted by PSPS in 2022 because of SDG&E's system hardening in 2021?

RESPONSE 4

SDG&E objects to the question on the grounds stated forth in General Objections Nos. 2, 3, and 7. Subject to the foregoing objections, SDG&E responds as follows:

a) SDG&E's distribution overhead hardening program has the ability to raise the alert speed of a circuit segment from the 95th percentile wind speed, or 35mph, to the 99th percentile wind speed, or 45mph. However, several other factors are also taken into consideration when determining the circuit segment's alert speed, including but not limited to the Vegetation Risk Index, temporary configurations, or pending repairs on poles within the segment. Additionally, the number of PSPS events or the scope of such events in a given year is dependent on weather conditions. Therefore, SDG&E is unable to precisely calculate the reduction in number of PSPS events in 2022 due to distribution overhead hardening.

b) As described in 4.a, SDG&E is unable to directly calculate the reduction in number of PSPS events and the subsequent customers impacted in 2022 due to distribution overhead hardening.

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

QUESTION 5

On page (p.) 352 of SDG&E's 2022 WMP, SDG&E states that "Based on existing electrical system data, every mile of strategic undergrounding completed in the HFTD is anticipated to reduce PSPS impacts for approximately 13 customers and for [sic] every sectionalizing device installed in the HFTD is anticipated to reduce PSPS impacts for approximately 371 customers." With this context:

(a) Has SDG&E conducted a cost-effectiveness analysis of reducing wildfire and PSPS risk via undergrounding lines versus sectionalization?

(b) If the answer to (a) is yes, please provide a copy of the analysis and any associated workpapers.

RESPONSE 5

SDG&E objects to the question on the grounds stated forth in General Objections Nos. 2, 3, and 7. Subject to the foregoing objections, SDG&E responds as follows:

a) The figures provided on page 352 of SDG&E's 2022 WMP were derived from historical figures of work that has been completed. Regarding the analysis of risk reduction, SDG&E looks at the cost-effectiveness for mitigation initiatives as part of the risk spend efficiency (RSE) calculations provided in Table 12 of the WMP. RSEs are calculated as the risk reduced (wildfire risk and/or PSPS risk) times the lifetime of the mitigation benefit divided by the mitigation cost. Risk reduction from undergrounding lines is derived from both a reduction in wildfire risk associated with potential ignitions from operating an overhead system and a reduction in PSPS risk for customers impacted by direct undergrounding. Undergrounding risk reduction is primarily driven by wildfire risk reduction. Risk reduction for sectionalizing devices is derived only from a reduction in PSPS risk, and therefore a direct comparison of these two programs is not applicable and has not been completed.

b) N/A.

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

QUESTION 6

On page (p.) 356 of SDG&E's 2022 WMP, SDG&E states that "After discussions with Southern Orange County stakeholders in 2021, it was determined that a mobile CRC would be adequate to support any future PSPS impacts." With this context:

a) How does SDG&E determine that "mobile CRCs" are appropriate for a situation? Please include criteria used if applicable.

b) What measures does SDG&E take to ensure that it provides all required services at a mobile CRC, per Commission Decision 20-05-051, p. A6?

RESPONSE 6

SDG&E objects to the question on the grounds stated forth in General Objections Nos. 2, 3, and 7. Subject to the foregoing objections, SDG&E responds as follows:

a) SDG&E coordinates with local jurisdictions or other relevant stakeholders when reviewing a location for a potential CRC. In the specific comments on page 356 of our 2022 WMP, we worked with Southern Orange County's Emergency Manager to discuss the potential need for a Community Resource Center to serve the area. Southern Orange County agreed with SDG&E that due to the infrequent nature of PSPS impact to Southern Orange County, investing in a permanent CRC was not prudent. Set criteria for evaluating if a mobile CRC is required does not exist but instead SDG&E coordinates with the local stakeholders to openly review each unique situation. Some factors we review are frequency of historical PSPS events and location of impacted areas relative to other non-impacted areas (10-15 minute drive for example).

b) SDG&E distributes all required services at mobile CRCs to satisfy the required services identified in Commission Decision 20-05-051. Mobile CRCs operated in a drive-thru format and consequently, we had to adjust the required services to either fit within emergency kits or supply such services via other method. SDG&E representatives offered outage updates in person and handed out bottled water, snacks, ice, and emergency kits. The emergency kits might vary from one event to the next but at a minimum, offer items such as vehicle AC inverters to charge devices (cell phones/medical devices) leveraging the 12V DC power receptacle in vehicles and drinking water. If a customer requires use of a restroom, we offer portable restrooms where they may pull over to use the facilities. Additionally, our mobile CRCs are equipped with wireless access points so that customers may pull over to the designated safe parking area to connect their cell phone, computer, or other wireless device to the internet for email or telephone needs. As a reminder, the drive-thru format was only used as a result of the pandemic to ensure the safety of

the public and employees. SDG&E intends to pivot back to brick and mortar CRCs in 2022 but will maintain three mobile CRCs for any future needs.

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

QUESTION 7

On page (p.) 359 of SDG&E's 2022 WMP, Figure 8-3: Historical FPI from 2022 to 2021, SDG&E highlights the correlation between Fire Potential Index and major wildfires. With this context:

a) How does SDG&E define a "major wildfire"?

b) How does SDG&E define a "catastrophic wildfire"?

c) Is Figure 8-3 based on data from SDG&E's service territory or statewide data?

d) Please identify each of the major wildfires noted with a circle in Figure 8-3, including the name of the fire, ignition date, and the utility service territory in which it ignited.

RESPONSE 7

SDG&E objects to the question on the grounds stated forth in General Objections Nos. 2, 3, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows:

a) A "major wildfire" is not explicitly defined but is based on the probability of fires should an ignition occur as compared to the Fire Potential Index rating. That said, a "major wildfire" is considered to be 250 acres or more.

b) A "catastrophic wildfire" is not explicitly defined but is based on the probability of fires should an ignition occur as compared to the Fire Potential Index rating. That said, a "catastrophic wildfire" is considered to be 5000 acres or more.

c) Figure 8-3 based on data from SDG&E's Service Territory only, based on specific weather and fuels data.

d) Fires depicted as black circles on the Fire Potential Index figure 8-3 are listed below and details on each is publicly available:

- 2003 showing Cedar Fire (slightly off on timeline).
- Border 50 Fire (2005)
- 2007 Firestorm (2007)
- Guiberson Fire (Ventura County, 2009)
- Great Fire (2011)
- De Luz Fire (2013)
- Border Fire (2016)
- Lilac Fire (2017)

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

QUESTION 8

On page (p.) 363 of SDG&E's 2022 WMP, SDG&E describes its new Public Safety Partner Portal. With this context:

a) Did SDG&E receive any feedback from any Public Safety Partners (including first responders, jurisdictions, tribal governments, water, and telecommunications providers, CalOES, and County OES) on the function of the portal?

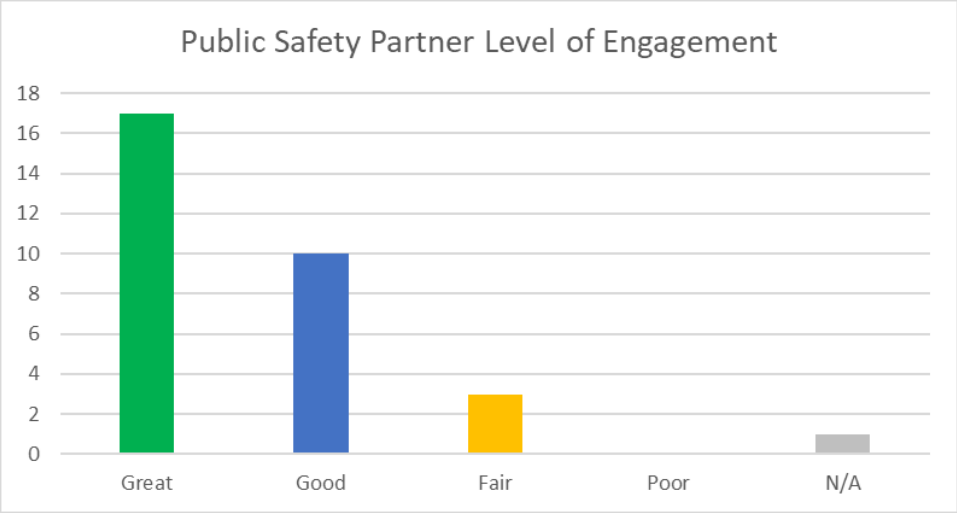
b) If the answer to part (a) is yes, please list each partner who provided feedback and the nature of their feedback.

c) Please provide example screenshots or other demonstrations of the function of new public safety partner portal.

RESPONSE 8

SDG&E objects to the question on the grounds stated forth in General Objections Nos. 2, 3, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows:

a) Yes, SDG&E conducted a post event online survey for public safety partners which included questions specifically related to the portal. The results of the engagement are captured below:



b) Many of the comments were a generic "thank you" or "no comment". The following comments were more specific:

- *"It's great. Could be improved if life support customers were broken down out of MBL."* ~ San Diego Office of Emergency Services
- *"Thank you for the portal. It has helped me to improve communication about PSPS events to our community."* ~ Pala Band of Mission Indians
- *"While a great product, it seemed very duplicative of what was in our emails and public facing information. The only difference the portal offered was notification of the communities being re-energized, and what time that occurred. That was nice, but not extremely important if it was not my community. I would also recommend being able to click on a community and have it automatically link to the outage map so we can click on the icons to determine which circuits are affected. While we can scroll down and view the map, this makes it a "one stop shopping" of clicking on the community while we're there."* ~ City of Poway Fire Dept

c) Based on some constructive feedback we received from our public safety partners, we have worked with our portal vendor to add the following functionality:

1. Added a color-coded status bar by community so the partners can see at a quick glance the status of their community.
2. Ability to click community name to expand and see the status by sectionalizing device.

Additionally, SDG&E is in the process of distinguishing between Medical Baseline Customer count and Life Support Customer count.

For the 2022 season, SDG&E will continue to refine and improve functionality of the current portal but is also re-engaging the original partner focus group to add on a PSPS Partner Mobile App which will include push notifications. The Mobile App release is anticipated for Q3.

Please see attached "Q8_Public Safety Partner Portal Enhancements Screenshots.PDF" for screenshots.

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

QUESTION 9

In section 8.4 of SDG&E's 2022 WMP, titled "Engaging Vulnerable communities", on page (p.) 366 SDG&E describes its engagement with Community Based Organizations (CBOs) to help prepare Access and Functional Needs (AFN) customers for PSPS events. With this context:

a) Please identify each CBO that provided feedback to SDG&E on this topic in 2021.

b) For each CBO that provided feedback SDG&E's efforts to mitigate the impacts of PSPS in 2021, please describe the feedback.

c) Please provide one example each of a communication from each of SDG&E's partner CBOs regarding managing PSPS impacts on AFN and/or medical baseline customers.

d) Please describe the feedback that SDG&E received from AFN customers on SDG&E's efforts to mitigate the impacts of PSPS in 2021.

RESPONSE 9

SDG&E objects to the question on the grounds stated forth in General Objections Nos. 2, 3, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows:

a) SDG&E has not received formal feedback from CBOs related to this topic outside of Regional Working Groups.

b) Not applicable.

c) All CBO partners were provided with an AFN toolkit and flyer with information to share with their constituents. However, not all individual communications from CBOs to their constituents are readily available to SDG&E. Additionally, SDG&E provides a daily brief throughout PSPS to CBOs with updates to pass along to their constituents. For examples of the tool kit and flyer provided to CBOs and individual communications sent by CBOs, please see attachment "Q9c_Data Request 9C Examples.docx." The full SDG&E toolkit is available via a Dropbox if interested.

d) SDG&E solicited feedback via its Pre-Season Survey and its 2021 Post-Incident Report Survey following the one PSPS that occurred in November. The results are summarized below:

- An average of 60% of individuals with AFN were aware that their utility may de-energize their system as a wildfire mitigation measure
- An average of 57% of individuals with AFN were aware of what support and resources were available to them during de-energization

- 95% of individuals with AFN confirmed they received notifications of a possible de-energization event
- 78% of those who rely on electric equipment to maintain necessary life functions were able to utilize such equipment, or were otherwise able to maintain necessary life functions, for the duration of any de-energization event
- 81% of individuals with AFN who sought support for a PSPS-related issue reported they were “Satisfied or Very Satisfied” with SDG&E’s performance.

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

QUESTION 10

In subsection 4 of section 4.5.1.1 of SDG&E's 2022 WMP, titled "PoI Model," SDG&E acknowledges gaps in "ground truth" data sources. SDG&E states:
To address gaps in "ground truth" data sources, such as GIS asset information, the Enterprise Asset Management Platform (EAMP) provides users with the technology to make better informed decisions on maintenance, inspection, risk identification, and prioritizing electric asset. investments."

a) Does SDG&E dispatch field observers to areas with expected gaps in "ground truth" information to validate PSPS decision-making?

b) If the answer to (a) is yes, how influential on the final decision on whether to de-energize are the opinions of the field observers discussed in part (a)?

c) If the answer to (a) is yes, when did SDG&E start the practice discussed in part (a)?

RESPONSE 10

SDG&E objects to the question on the grounds stated forth in General Objections Nos. 2, 3, and 7. Subject to the foregoing objections, SDG&E responds as follows:

a) No. During the model creation phase, sometimes data gaps, incorrect values, or conflicting information is identified in the systems "ground truth". When this happens, these findings are notified to the Enterprise Asset Management Platform (EAMP) team and a process of data validation and correction is initiated.

b) N/A

c) N/A

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

QUESTION 11

In section 4.5.1.1 of SDG&E's 2022 WMP, titled "PoI Model," SDG&E states that

> Similarly, the determination of asset installation date for older assets, which is critical for failure rate calculations, requires heavy investigation into documents that are often difficult to manage or access. The POI models rely on this foundational data infrastructure and are limited by the quality of this data.

a) When the installation date of an asset is unknown, how does SDG&E determine the installation date to use for purposes of failure rate calculations? Does SDG&E estimate or assume asset installation dates?

b) If SDG&E uses estimated or assumed installation dates for purposes of failure rate calculations, how does SDG&E determine these dates?

c) To what extent does the failure rate calculation impact PSPS decision-making?

RESPONSE 11

SDG&E objects to the question on the grounds stated forth in General Objections Nos. 2, 3, and 7. Subject to the foregoing objections, SDG&E responds as follows:

For the purposes of POI modeling, SDG&E did not determine or assume installation dates since this data point (corresponding to asset age) was not included as an input for the reported models. The provided excerpt refers to the use of the *data infrastructure* established by the Enterprise Asset Management Platform (EAMP); the mention of installation date and failure rates was only to provide an example of ongoing EAMP activities, albeit unrelated to POI modeling. SDG&E expects to revisit the applicability of using installation date in updated POI models and will disclose all processes for filling data gaps should the variable ultimately be used in models.

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

QUESTION 12

In section 4.5.1 of SDG&E's 2022 WMP, SDG&E provides Table 4-17 titled, "Risk Drivers for POI Models."

a. Does SDG&E consider contact risks (such as balloon contact, vehicle strike, or animal contact) when making PSPS decisions?

b. If so, how?

RESPONSE 12

SDG&E objects to the question on the grounds stated forth in General Objections Nos. 2, 3, and 7. Subject to the foregoing objections, SDG&E responds as follows:

Contact risks (e.g., balloon contact, vehicle strike, or animal contact) shown in Table 4-17 of SDG&E's 2022 WMP are each modeled separately and then aggregated into an overall POI model as depicted in Figure 4-19 of the report. The overall POI model outputs are provided to PSPS decision-makers via the WiNGS Ops tool for situational awareness during PSPS events.

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

QUESTION 13

In section 4.5.1 of SDG&E's 2022 WMP, SDG&E describes how it distills complex POI model outputs into a "high-medium-low" scale for use in PSPS decision-making. SDG&E states, "Since the amount of detail contained in the model may overwhelm decision-makers during activation, key information was distilled into a 'high-medium-low' CRI to match the format, simplicity, and familiarity of the VRI."

a) Describe how SDG&E determined which value thresholds to use for the "high" POI category.

b) Please state the thresholds for the "high" PoI category.

c) Describe how SDG&E determined which value thresholds to use for the "medium" POI category.

d) Please state the thresholds for the "medium" PoI category.

e) Describe how SDG&E determined which value thresholds to use for the "low" POI category.

f) Please state the thresholds for the "low" PoI category.

RESPONSE 13

SDG&E objects to the question on the grounds stated forth in General Objections Nos. 2, 3, and 7. Subject to the foregoing objections, SDG&E responds as follows:

The "high-medium-low" index (CRI) used for PSPS decision-making rank the "relative riskiness" of segments based on cubic functions of wind gust. The nature of this function is such that at normal wind speeds, all segments have similar risk, but at elevated wind speeds, the riskiest segments will have an exponentially higher probability of ignition (POI). Therefore, the CRI reflects the rate at which POI increases with wind gust, where the highest rates (i.e., the "riskiest" segments) are indexed as "high" and the lowest rates as "low".

As noted in SDG&E's 2022 WMP, SDG&E consulted with emergency operators and "found it favorable and intuitive to define the CRI based on the wind gust at which a certain probability threshold is surpassed", which is indirectly a quantification of the rate of POI increase defined by the cubic function. The wind gust thresholds for indexing are shown in the table below. These values were determined by internal subject matter experts to be intuitive, loosely based on engineering design, and reasonably spaced so to differentiate the segments risks.

Index	Range

Low	> 55 mph
Medium	45 – 55 mph
High	< 45 mph

With this approach, the probability threshold to which the wind gust ranges correspond is the key variable for differentiating the segments. This value is estimated such that the resulting high-risk segments are reasonably aligned with feedback from internal subject matter experts, increase in amount of force applied to equipment at different wind speeds and past PSPS events. For example, an ignition probability threshold of one in ten thousand was used in initial operations. These estimates provide emergency operators with additional situational awareness for PSPS decision-making.

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

QUESTION 14

In SDG&E's 2022 WMP, Figure 4-22: Wildfire Growth Simulation Example, provides an example of simulated wildfire growth over the span of 15 hours, with associated impact on structures.

a) When using wildfire growth simulations, like that provided in Figure 4-22 of your WMP update, for PSPS event scoping, does SDG&E modify the assumption of 15 hours of unchecked wildfire growth depending on the location of the ignition? (For example, ignitions in more densely populated areas are typically closer to firefighting resources.)

b) When using wildfire growth simulations for PSPS event scoping, does SDG&E modify its assumptions of fire spread based on the contemporaneous availability of firefighting resources?

c) Are there any circumstances other than those discussed in parts (a) and (b), where you modify the assumption of 15 hours of fire spread when using wildfire growth simulations?

RESPONSE 14

SDG&E objects to the question on the grounds stated forth in General Objections Nos. 2, 3, and 7. Subject to the foregoing objections, SDG&E responds as follows:

a) Figure 4-22 graphically depicting a wildfire growth simulation over the span of 15 hours, with associated impact on structures, was provided as an example. SDG&E fire coordination and meteorology teams normally use a standard 8-hour simulation for wildfire growth simulations.

b) Wildfire simulations assume that firefighting resources are unavailable.

c) As indicated, SDG&E fire coordination and meteorology teams normally use a standard 8-hour simulation for wildfire growth simulations. The simulation time can be adjusted as necessary.

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

QUESTION 15

In SDG&E's 2022 WMP, Table 4-19: Model Assumptions for PSPS and Wildfire Consequence, one of the values used by SDG&E is "Serious Injuries and Fatalities (SIF) per customer minutes." Please explain how SDG&E calculates SIF and provide any relevant supporting documentation.

RESPONSE 15

SDG&E objects to the question on the grounds stated forth in General Objections Nos. 2, 3, and 7. Subject to the foregoing objections, SDG&E responds as follows:

The values of the model inputs shown in Table 4-19 of SDG&E's 2022 WMP are continually undergoing review and revision. SDG&E therefore provides the latest estimates that were used in its post-PSPS reporting (https://www.sdge.com/sites/default/files/2021-12/R1812005%20SDGE%20PSPS%20Post-Event%20Report%20Nov.%2024-26.pdf). In the case of the "SIF per customer-minutes", SDG&E relied on feedback from internal subject matter experts to determine a reasonable starting point after analyzing historical PSPS events. This value, along with others noted in Table 4-19, will be reviewed prior to any 2022 PSPS event.

THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-08
SDG&E RESPONSE

Date Received: February 28, 2022
Date Submitted: March 3, 2022

END OF REQUEST