

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

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

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

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-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

III. RESPONSES

As this data request relates to SDG&E’s Wildfire Mitigation Plan (WMP), which sets forth programs and initiatives that are generally focused in the High Fire Threat District (HFTD), the information and numbers provided in responses are focused on the HFTD.

QUESTION 1

In Attachment D of SDG&E’s 2022 WMP, titled “Detailed Progress Report on Key Areas of Improvement,” SDG&E states on page (p.) 22:

SDG&E has taken additional steps to improve the inspections and testing of SCADA switches to minimize customer impacts of devices being inoperable during PSPS events. SDG&E instituted new processes during the 2020 PSPS season that included identifying bypassed devices and devices out of communication within the HFTD. In 2021 SDG&E has identified 33 such devices and has repaired 30 to date, restoring their remote functionality.

- a) When does SDG&E plan to have the last three remaining SCADA devices that were identified in 2021 restored to full remote functionality?
- b) What are the “additional steps” SDG&E has taken to improve the inspections of SCADA switches to avoid having inoperable switches during PSPS events?
- c) What is SDG&E’s process for identifying and then repairing SCADA devices out of communication within the HFTD?

RESPONSE 1

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

- a) The remaining three SCADA devices have been restored to full remote functionality.
- b) For switches located in the HFTD Tier 3, SDG&E has changed its practice to replace batteries annually instead of every three years.
- c) If a SCADA site shows out-of-comm status in the Distribution SCADA Headend system, the Distribution System Operator toggles the site to attempt to bring the site back in communication. If unsuccessful, an Electronic Control Technologist is contacted to address and repair the issue in the field.

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

QUESTION 2

In Attachment D of SDG&E’s 2022 WMP, titled “Detailed Progress Report on Key Areas of Improvement,” SDG&E states on p. 22 that “after review of these PSPS events, only three items were related to an inoperable SCADA switch and the rest were related to unexpected impacts from weather.”

- (a) Provide an up-to-date count of how many customers experienced an unnoticed de-energization event due to inoperable SCADA switches, in 2020
- (b) Provide the total customer-minutes of de-energization attributable to inoperable SCADA switches in 2020.
- (c) Identify the date and location of each unnoticed de-energization event due to inoperable SCADA switches, in 2020.
- (d) Provide an up-to-date count of how many customers experienced an unnoticed de-energization event due to inoperable SCADA switches, in 2021.
- (e) Provide the total customer-minutes of de-energization attributable to inoperable SCADA switches in 2021.
- (f) Identify the date and location of each unnoticed de-energization event due to inoperable SCADA switches, in 2021.

RESPONSE 2

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

- a) SDG&E experienced two back-to-back PSPS events in December 2020 where a total of 4,604 unique customers experienced unnoticed de-energization due to inoperable SCADA switches. One device was operated during both events, resulting in some customers being impacted twice.
- b) SDG&E had 9,272,636 customer minutes of de-energization attributable to inoperable SCADA switches in 2020.
- c) The table below represents the date and location of each unnoticed de-energization event due to inoperable SCADA switches in 2020.

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

PSPS EVENT	Device Id	District
Dec 2- Dec 4, 2020	450-88R 728-690 920-735AE	NE BC NE
Dec 6- Dec 9, 2020	450-88R	NE

- d) Not applicable: SDG&E did not experience an unnoticed de-energization event due to inoperable SCADA switches in 2021.
- e) Not applicable: SDG&E did not experience an unnoticed de-energization event due to inoperable SCADA switches in 2021.
- f) Not applicable: SDG&E did not experience an unnoticed de-energization event due to inoperable SCADA switches in 2021.

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

QUESTION 3

In Attachment D of SDG&E's 2022 WMP, titled "Detailed Progress Report on Key Areas of Improvement," SDG&E states on page (p.) 22 "SDG&E takes system-level proactive steps to validate that existing SCADA switches remain fully functional. SDG&E has internal operating procedures that call for testing SCADA switches in the fire area annually." With this context:

- a) Describe the system-level proactive steps you took in 2021 to validate that the SCADA switches are remaining functional from start to finish.
- b) Describe the system-level proactive steps you have taken or plan to take in 2022 to validate that the SCADA switches are remaining functional from start to finish.
- c) What is the expected inspection cycle for SCADA switches in HFTD 3 areas?
- d) What is the expected inspection cycle for SCADA switches in HFTD 2 areas?
- e) What is the expected inspection cycle for SCADA switches in Non-HFTD areas?

RESPONSE 3

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

- a) In 2021, SDG&E performed annual operational testing of the SCADA switches in HFTD Tier 3 along with annual battery replacements. This is the form of routine maintenance that these switches undergo. In addition, commissioning testing is performed at the time when the switch is placed in service as a SCADA device across the entire service territory. This includes relay calibration, trip testing, and point-to-point testing with the control center.
- b) In addition to what is mentioned in part a), SDG&E plans to operate motor actuators for multi-position switches in the HFTD.
- c) The inspection cycle for the SCADA switches in HFTD Tier 3 is annual for operational tests and battery replacement.
- d) The inspection cycle for the SCADA switches in HFTD Tier 2 areas is every six years for operational tests and every three years for battery replacement.
- e) The inspection cycle for the SCADA switches in non-HFTD areas is every six years for operational tests and every three years for battery replacement.

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

QUESTION 4

In Attachment D of SDG&E’s 2022 WMP, titled “Detailed Progress Report on Key Areas of Improvement,” SDG&E references “non-communicative SCADA switches.” With this context:

- a) Has SDG&E identified any additional “non-communicative SCADA switches” (that is, additional to those identified during the 2020 PSPS season) for which it will need to restore remote functionality in 2022?
- b) If yes to part a), how many such additional non-communicative SCADA switches were identified in 2021?
- c) If yes to part a), how many such additional non-communicative SCADA switches were identified in 2022?
- d) If yes to part a), what is SDG&E’s timeline to addresses the identified switches referenced in part a)?

RESPONSE 4

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

- a) No additional switches have been identified.
- b) N/A
- c) N/A
- d) N/A

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

QUESTION 5

In Table 12 of the February 11, 2022 non-spatial data (2022 WMP Attachment B), SDG&E provides “Mitigation initiative financials.” Please answer the following questions regarding Table 12, Row 25, cell BB:

- a) How many of the 33 identified SCADA capacitors are within a Tier 3 HFTD area?
- b) How many of the 33 identified SCADA capacitors are within a Tier 2 HFTD area?
- c) How many of the 33 identified SCADA capacitors are within a Non-HFTD area?

RESPONSE 5

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

- a) None, as SDG&E expects to be completed with all capacitor replacements in Tier 3 in 2022.
- b) None, as SDG&E expects to be completed with all capacitor replacements in Tier 2 in 2022.
- c) All 33 of the 2023 SCADA capacitors are located within the wildland urban interface (WUI) which is a non-HFTD area.

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

QUESTION 6

- a) Has SDG&E set a target date to complete the planned 2022 vegetation management (VM) work in HFTD areas that is described in your 2022 WMP update?
- b) If the answer to part a) is yes, please provide this target date.
- c) If the answer to part a) is no, please explain why you do not have a target date to complete the planned 2022 vegetation management (VM) work in HFTD areas.

RESPONSE 6

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

SDG&E plans to complete its planned 2022 vegetation management work in the HFTD by the end of 2022. VM follows a specific schedule of interrelated activities. Tree trimming and auditing is dependent upon, and follows, the pre-inspection activity. As such, some of the tree trim and audit activities that follow pre-inspection in Q4, 2022 will occur around Q1 of 2023.

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

QUESTION 7

- a) Has SDG&E set a target date to complete the planned 2022 enhanced vegetation management (EVM) work in HFTD areas that is described in your 2022 WMP update?
- b) If the answer to part a) is yes, please provide this target date.
- c) If the answer to part a) is no, please explain why you do not have a target date to complete the planned 2022 enhanced vegetation management (EVM) work in HFTD areas.

RESPONSE 7

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

SDG&E plans to complete its planned 2022 enhanced vegetation management work in the HFTD by the end of 2022. VM follows a specific schedule of interrelated activities. Tree trimming and auditing is dependent upon, and follows, the pre-inspection activity. As such, some of the tree trim and audit activities that follow pre-inspection in Q4, 2022 will occur around Q1 of 2023.

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

QUESTION 8

Please provide the following:

- a) The average amount of person-hours to perform a single climbing inspection of a transmission tower in 2021.
- b) The minimum amount of person-hours spent on a single climbing inspection of a transmission tower in 2021.
- c) The total amount of person-hours spent on climbing inspections of transmission towers in 2021.
- d) The total number of transmission towers that SDG&E performed climbing inspections on in 2021.
- e) The total number of climbing inspections of transmission towers that SDG&E performed in 2021 (note: this would differ from part (d) if you inspected the same tower more than once)

RESPONSE 8

SDG&E objects to the Question on the grounds set forth in General Objections Nos. 2, 3, 5, and 7. Additionally, as this data request relates to SDG&E's Wildfire Mitigation Plan, which sets forth programs and initiatives generally focused in the HFTD, the information and numbers provided in this response are focused on the HFTD.

Subject to the foregoing objections, SDG&E responds as follows:

- a) 12 hours
- b) 6 hours
- c) 576 hours
- d) 48 towers
- e) 48 towers

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

QUESTION 9

Please provide the following:

- a) The average amount of person-hours to perform a single drone inspection of a transmission tower in 2021.
- b) The minimum amount of person-hours spent on a single drone inspection of a transmission tower in 2021.
- c) The total amount of person-hours spent on drone inspections of transmission towers in 2021.
- d) The total number of transmission towers that SDG&E performed drone inspections on in 2021.
- e) The total number of drone inspections of transmission towers that SDG&E performed in 2021 (note: this would differ from part (d) if you inspected the same tower more than once)

RESPONSE 9

SDG&E objects to the Question on the grounds set forth in General Objections Nos. 2, 3, 5, and 7. Additionally, as this data request relates to SDG&E's Wildfire Mitigation Plan, which sets forth programs and initiatives generally focused in the HFTD, the information and numbers provided in this response are focused on the HFTD.

Subject to the foregoing objections, SDG&E responds as follows:

The information provided is inclusive of all transmission structure types, however not all transmission structures are towers.

- a) Approximately 1.5 hours
- b) Approximately 1 hour
- c) Approximately 2,000 hours
- d) 1,028 transmission structures were fully inspected in 2021.
- e) 1,028 transmission structures were fully inspected in 2021.

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

QUESTION 10

Please provide the following:

- a) The average amount of person-hours to perform a single detailed ground inspection of a transmission tower in 2021.
- b) The minimum amount of person-hours spent on a single detailed ground inspection of a transmission tower in 2021.
- c) The total amount of person-hours spent on detailed ground inspections of transmission towers in 2021.
- d) The total number of transmission towers that SDG&E performed detailed ground inspections on in 2021.
- e) The total number of detailed ground inspections of transmission towers that SDG&E performed in 2021 (note: this would differ from part (d) if you inspected the same tower more than once)

RESPONSE 10

SDG&E objects to the Question on the grounds set forth in General Objections Nos. 2, 3, 5, and 7. Additionally, as this data request relates to SDG&E's Wildfire Mitigation Plan, which sets forth programs and initiatives generally focused in the HFTD, the information and numbers provided in this response are focused on the HFTD.

Subject to the foregoing objections, SDG&E responds as follows:

- a) 35 minutes
- b) 10 minutes
- c) 1,142 hours
- d) 1,957 structures
- e) 1,957 structures

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

QUESTION 11

- a) How many Level 1 corrective tags were issued as a result of transmission tower climbing inspections in 2021?
- b) How many Level 2 corrective tags were issued as a result of transmission tower climbing inspections in 202

RESPONSE 11

SDG&E objects to the Question on the grounds set forth in General Objections Nos. 2, 3, 5, and 7. Additionally, as this data request relates to SDG&E's Wildfire Mitigation Plan, which sets forth programs and initiatives generally focused in the HFTD, the information and numbers provided in this response are focused on the HFTD.

Subject to the foregoing objections, SDG&E responds as follows:

- a) 0
- b) 2

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

QUESTION 12

- a) How many Level 1 corrective tags were issued as a result of transmission tower drone inspections in 2021?
- b) How many Level 2 corrective tags were issued as a result of transmission tower drone inspections in 2021?

RESPONSE 12

SDG&E objects to the Question on the grounds set forth in General Objections Nos. 2, 3, 5, and 7. Additionally, as this data request relates to SDG&E's Wildfire Mitigation Plan, which sets forth programs and initiatives generally focused in the HFTD, the information and numbers provided in this response are focused on the HFTD.

Subject to the foregoing objections, SDG&E responds as follows:

- a) No emergency issues (Level 1) were identified in 2021
- b) 28

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

QUESTION 13

- a) How many Level 1 corrective tags were issued as a result of transmission tower detailed ground inspections in 2021?
- b) How many Level 2 corrective tags were issued as a result of transmission tower detailed ground inspections in 2021?

RESPONSE 13

SDG&E objects to the Question on the grounds set forth in General Objections Nos. 2, 3, 5, and 7. Additionally, as this data request relates to SDG&E's Wildfire Mitigation Plan, which sets forth programs and initiatives generally focused in the HFTD, the information and numbers provided in this response are focused on the HFTD.

Subject to the foregoing objections, SDG&E responds as follows:

- a) 0
- b) 235

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

QUESTION 14

- a) How many Level 1 corrective tags were issued as a result of work verification or quality control of transmission tower climbing inspections in 2021?
- b) How many Level 2 corrective tags were issued as a result of work verification or quality control of transmission tower climbing inspections in 2021?

RESPONSE 14

SDG&E objects to the Question on the grounds set forth in General Objections Nos. 2, 3, 5, and 7. Additionally, as this data request relates to SDG&E's Wildfire Mitigation Plan, which sets forth programs and initiatives generally focused in the HFTD, the information and numbers provided in this response are focused on the HFTD.

Subject to the foregoing objections, SDG&E responds as follows:

No corrective tags were issued as a result of work verification or quality control.

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

QUESTION 15

- a) How many Level 1 corrective tags were issued as a result of work verification or quality control of transmission tower drone inspections in 2021?
- b) How many Level 2 corrective tags were issued as a result of work verification or quality control of transmission tower drone inspections in 2021?

RESPONSE 15

SDG&E objects to the Question on the grounds set forth in General Objections Nos. 2, 3, 5, and 7. Additionally, as this data request relates to SDG&E's Wildfire Mitigation Plan, which sets forth programs and initiatives generally focused in the HFTD, the information and numbers provided in this response are focused on the HFTD.

Subject to the foregoing objections, SDG&E responds as follows:

No additional corrective tags were issued as a result of work verification or quality control.

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

QUESTION 16

- a) How many Level 1 corrective tags were issued as a result of work verification or quality control of transmission tower detailed ground inspections in 2021?
- b) How many Level 2 corrective tags were issued as a result of work verification or quality control of transmission tower detailed ground inspections in 2021?

RESPONSE 16

SDG&E objects to the Question on the grounds set forth in General Objections Nos. 2, 3, 5, and 7. Additionally, as this data request relates to SDG&E's Wildfire Mitigation Plan, which sets forth programs and initiatives generally focused in the HFTD, the information and numbers provided in this response are focused on the HFTD.

Subject to the foregoing objections, SDG&E responds as follows:

No corrective tags were issued as a result of work verification or quality control.

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-09
SDG&E RESPONSE**

**Date Received: March 3, 2022
Date Submitted: March 8, 2022**

END OF REQUEST