

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.

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.

III. RESPONSES

QUESTION 1

Please provide a spreadsheet listing (as rows) each undergrounding project completed from January 1, 2020 through March 1, 2022. For each such project, include the following information (as columns):

- a) Grid hardening project ID number (matching OEIS' GIS Data Standard)¹
- b) Circuit ID
- c) ID number of each circuit-segment that was entirely undergrounded in the project
- d) ID number of each circuit-segment that was partially undergrounded in the project
- e) Circuit voltage
- f) Project start date
- g) Project completion date
- h) Number of months to complete the project planning
- i) Number of months to complete the design
- j) Number of months to complete the permitting
- k) Number of months to complete the construction
- l) An explanation of any additional project time not included in parts (h) through (k) above
- m) Total circuit-miles undergrounded
- n) Total miles of trenching required
- o) Total start-to-finish electric costs of the project (i.e., costs attributed to SDG&E's electric facilities), including costs for planning, design, permitting, and construction.
- p) Total start-to-finish costs of the project, including costs attributed to non-electric utilities, including costs for planning, design, permitting, and construction.
- q) Whether this was a Rule 20 project (yes/no)
- r) Whether this was a WMP project (yes/no)
- s) Whether this was a post-wildfire rebuilding project (yes/no)
- t) Whether SDG&E shared trenches for this project with any telecommunications utilities (yes/no)
- u) Whether SDG&E shared trenches for this project with gas facilities (yes/no)
- v) The expected useful life of the project

RESPONSE 1

SDG&E objects to the Question on the grounds set forth in General Objections Nos. 2, 3, 5, and 9. SDG&E notes that the review of costs, including costs associated with its WMP initiatives, are not relevant to approval of its WMP and are more appropriately addressed during proceedings at the CPUC addressing cost recovery. The costs contained herein may therefore be subject to change. Subject to the foregoing objections, SDG&E responds as follows:

See attachment "CalPA WMP-11 Question 1 and 6d.xls."

QUESTION 2

Please provide a geodatabase file with a polyline feature for each undergrounding project completed from January 1, 2020 through March 1, 2022. In addition to the spatial location, please provide the following attributes for each project:

- a) Grid hardening project ID number (matching OEIS' GIS Data Standard)²
- b) Circuit ID
- c) Project completion date

RESPONSE 2

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

See attachments "CalPA WMP-11.kmz," and "CalPA WMP-11 Question 2.xlsx."

QUESTION 3

In section 7.3.4.14 of SDG&E’s 2022 WMP, titled “Quality assurance/quality control of inspections,” SDG&E states that, To mitigate this risk, CMP inspections are audited. Inspection audits are managed by Operation and Engineering managers who are responsible for audits in each of the operating districts. This process also allows field supervisors to evaluate the inspectors and ensure they are all aligned with SDG&E’s protocols and procedures.

a) Please provide the number of inspection audits performed by Operation and Engineering managers in 2021.

b) Please provide five samples of the inspection audits performed by Operation and Engineering managers in 2021.

RESPONSE 3

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

a)


District	Audits	Total Audits
EA	Q1 2021	36
EA	Q2 2021	60
EA	Q3 2021	62
MTE	Q1 2021	13
MTE	Q2 2021	4
MTE	Q3 2021	46
NRE	Q1 2021	75
NRE	Q2 2021	49
NRE	Q3 2021	2
RAM	Q1 2021	70
RAM	Q2 2021	8
RAM	Q3 2021	0
Grand Totals	----	425

b)


EA - 3rd Qtr 2021
OH Scan.pdf


EA - 2nd Qtr 2021
OH Scan.pdf


NE - CMP QA
Audit_NE_OH_Q2-20


RA - Q1 2021 OH
Internal Audits.pdf


ME - QTR3 2021
Audit 101.pdf

QUESTION 4

In section 7.3.4.9.2 of SDG&E's 2022 WMP, titled "Drone assessments of distribution infrastructure," SDG&E provides Figure 7-8: Intelligent Image Processing Improves. With this context:

- a. a) How long does it take for SDG&E to complete the entire process from Step 1 to Step 4 in Figure 7-8?
- b. b) Please provide five samples of the inspection reports performed by Qualified Electrical Workers (QEWs) in 2021.

RESPONSE 4

- a) Approximately 5 days.
- b) See attached "DIAR 2021 Assessment Reports" 1-5.

QUESTION 5

In section 7.3.4.9.2 of SDG&E's 2022 WMP, titled "Drone assessments of distribution infrastructure," SDG&E explains and details its Drone Investigation, Assessment and Repair (DIAR) Program and work that has been completed within SDG&E's territory. With this context:

- a) In 2021, did SDG&E complete inspections of all the Tier 3 distribution poles that were not completed in 2020?
- b) If no to part (a), please state when SDG&E plans to complete inspection of all of its Tier 3 distribution poles.
- c) Does SDG&E plan on completing drone inspections of all the Tier 2 distribution poles in 2022?
- d) If no to part c), please state when SDG&E plans to have finished inspecting all the Tier 2 distribution poles as part of its DIAR program.

RESPONSE 5

- a) No, only with regard to poles that were (i) replaced or constructed within the last 24 months, (ii) that were scheduled for construction or replacement in 2021 (iii) where flight operations could not safely be conducted (iv) where the pole could not be accessed or (v) where an agency will not permit drone flights (i.e. State parks land).
- b) SDG&E will complete inspections of poles within State Parks jurisdiction once authorization is obtained from California State Parks.
- c) Yes, except for poles that were (i) replaced or constructed within the last 24 months, (ii) that are scheduled for construction or replacement in 2022, (iii) where flight operations could not safely be conducted (iv) where the pole could not be accessed or (v) where an agency will not permit drone flights.
- d) N/A

QUESTION 6

In section 4.1.3 of SDG&E's 2022 WMP, titled "Grid Design and System Hardening," SDG&E states that, "Undergrounding can be implemented effectively at shallower depths, resulting in improved cost effectiveness." With this context:

- a) Please state the total number of undergrounding circuit-miles that SDG&E plans to complete at "shallower depths" in 2022.
- b) What is SDG&E's current estimate of the cost per circuit-mile for the projects addressed in part
(a) of this project?
- c) What is SDG&E's estimate of the cost per circuit-mile for the projects addressed in part (a), if these undergrounding projects were constructed with the traditional trench depths instead of the "shallower depths" noted in the quote above.
- d) Please provide any workpapers that SDG&E used to develop the cost estimates addressed in parts (b) and (c) of this question.

RESPONSE 6

SDG&E objects to the Question on the grounds set forth in General Objections Nos. 2, 3, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows:

- a) Approximately 79 Miles; Total mileage to be completed in 2022 is subject to change depending on permit, easement acquisition, environmental, field conditions, and other factors outside of SDG&E's control.
- b) Currently it is approximately \$2.42 million per mile. This amount is subject to change depending on permit requirements, easement acquisition, environmental constraints, field conditions, and other factors outside of SDG&E's control.
- c) The Strategic Undergrounding Program has implemented shallow cover depth since mid-2020, therefore, the program does not currently have enough data for cost per mile calculation of traditional trench depth of 30" cover.
- d) Cost per mile provided for Question 6b is based on the excel worksheet provided titled "CalPA WMP-11 Question 1 and 6d."

*Based on current actuals to date + remaining forecast

	Cost/Mile	Notes
Civil	\$ 1,600,000.00	Based on 2020 and 2021 projects.
Electrical	\$ 200,000.00	Based on 2020 and 2021 projects.
Material	\$ 120,000.00	Based on 2020 and 2021 projects.
Construction	\$ 1,920,000.00	
Engineering & Design	\$ 350,000.00	
Project Support	\$ 122,600.00	Based on 2021 Forecasted Spend
Internal Labor	\$ 26,000.00	Based on 2021 Forecasted Spend
Total Directs	\$ 2,418,600.00	

END OF REQUEST