

**PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2023WMP-15
SDG&E RESPONSE**

**Date Received: May 03, 2023
Date Submitted: May 08, 2023**

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

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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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QUESTION 1

Regarding SDG&E's Underground (UG) Switches:

- a) List the types of UG switches that SDG&E uses in vaults.
- b) For each type of switch in the part (a), state whether it is manually operated or SCADA-capable.

RESPONSE 1

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 3, and 5. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E has many types of subsurface structures in which switches may be installed, including handholes, manholes, and dry underground vaults. Of those switches, the electrical insulation types and their configurations for vault installations include:

- Air
 - In-Out (Manual)
- Oil
 - In-Out (Manual)
 - 4-Way (Manual & SCADA)
 - 5-Way (Manual & SCADA)
- SF-6 Gas
 - 4-Way (Manual & SCADA)
 - 6-Way (Manual & SCADA)
- Solid Di-Electric
 - In-Out (Manual)
 - 4-Way (Manual & SCADA)
 - 6-Way (SCADA)

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QUESTION 2

Regarding SDG&E's Underground (UG) Switches:

How far apart are the UG switches on a typical UG circuit segment in the HFTD?

RESPONSE 2

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 3, and 5. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Underground sectionalizing is not based on distance alone, but on multiple criteria. Below are some of the criteria that are outlined in SDG&E's Electric Distribution Design Manual:

1. No more than one mile of overhead or underground feeder should exist between switches
2. An underground switch should be placed every 100A of actual 12kV peak load or 4000kVA of connected line transformer nameplate load, whichever comes first.
3. No more than 1000 metered customers shall be connected between switches
4. Dedicated switch positions for all 3000kVA transformer connections
5. All primary metered service connections to the feeder system shall be made through fuses, switches, or switch positions capable of fault interruption

This list is not all-inclusive.

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QUESTION 3

Please explain the purpose of the riser installations in the WMP underground projects.

RESPONSE 3

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 3, and 5. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Riser installations are used in WMP underground projects as transition points from overhead conductors to underground cables and vice versa. The “riser”, or conduit, will be attached to a pole which is then identified as a “riser pole”.

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END OF REQUEST