

**PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2023WMP-17
SDG&E RESPONSE**

**Date Received: July 27, 2023
Date Submitted: August 10, 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

- (a) Please describe your general process or strategy for developing load forecasts.
- (b) Do you have a written process or procedure for developing load forecasts?
- (c) If the answer to (b) is "yes", provide a copy.
- (d) If the answer to (b) is "no", explain why not.

RESPONSE 1

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

- (a) SDG&E responds to this question assuming the “load forecast” is asked in the context of its annual Distribution Planning Process (DPP). SDG&E provides a description of its load forecast process in its annually submitted Grid Needs Assessment (GNA) report.¹
- (b) Yes, this process is described in the GNA report.
- (c) A link to the GNA report is included in this response.
- (d) N/A

¹ SDG&E’s most recent GNA report is located at:
docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M496/K592/496592463.PDF

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QUESTION 2

- (a) Do you consider load growth projections when you determine which system hardening measures to deploy for wildfire mitigation purposes?
- (b) If the answer to (a) is "yes", explain how load growth projects influence your mitigation selection process.
- (c) If the answer to (a) is "no", explain why not.

RESPONSE 2

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

- (a) SDG&E's WiNGS-Planning tool utilizes wildfire risk to prioritize and recommend system hardening mitigations. Load growth projections are not a factor within the WiNGS-Planning tool.
- (b) N/A
- (c) The primary objective of SDG&E's wildfire mitigation system hardening initiatives is to reduce the risk of catastrophic wildfire by reducing the chance of infrastructure-related ignition. Load growth projections are not a factor in reducing this risk. As part of the planning for implementing these system hardening measures, however, load growth is reviewed and considered as described in responses three through six. Generally, within the HFTD areas as projects are designed for increased wind loading the conductor size will increase leading to additional capacity on these circuits.

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QUESTION 3

- (a) When you plan system hardening projects for wildfire mitigation purposes, do you design projects to accommodate forecasted load growth?
- (b) If yes, what degree of load growth do you design for?
- (c) Describe your process for incorporating forecasted load growth into the design of system hardening projects (for instance, which scenarios of possible load growth are considered).

RESPONSE 3

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

- (a) Yes. Distribution Planning is consulted during the planning stage of hardening projects to ensure current load and anticipated load growth are accounted for, in accordance with the response to Question 1. In addition, for undergrounding projects, distribution transformers are sized higher than current load requires in anticipation of future electrification demand.
- (b) SDG&E does not design its projects to meet a specific load growth amount. Rather, Distribution Planning is consulted to understand the current and future load requirements of the specific circuit being hardened.
- (c) Please see SDG&E's GNA report referenced in question 1.

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QUESTION 4

- (a) In a typical bare conductor to covered conductor conversion project, is the intention to maintain, increase, or decrease the load capacity at peak operating temperatures?
- (b) Explain the reasoning for your response to part (a).

RESPONSE 4

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

- (a) In a typical bare conductor to covered conductor conversion project the intent is to increase load capacity. The covered conductor wire sizes utilized by SDG&E are typically larger than those being replaced.
- (b) Generally, when designing system hardening projects like covered conductor for increased wind loading, the conductor size will increase. This will correspondingly increase the load capacity on the circuit. As described in question three, Distribution Planning is consulted to ensure current and future load growth is considered.

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QUESTION 5

- (a) Are all new covered conductor installation projects designed to accommodate loads greater than current capacity for the same circuit?
- (b) If the answer to (a) is "yes", explain how.
- (c) If the answer to (a) is "no", explain why not.

RESPONSE 5

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

- (a) Yes. See response to Question 3. Tie/Feeder lines are typically designed for 500 amps or more of capacity.
- (b) Distribution Planning is consulted during the planning stage of hardening projects to ensure current load and anticipated load growth are accounted for. The main feeder and ties to other circuits are designed utilizing conductor rated for 500 amps or more of capacity.

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QUESTION 6

- (a) Are all overhead to underground conductor conversion projects designed to accommodate loads greater than current capacity for the same circuit?
- (b) If the answer to (a) is "yes", explain how.
- (c) If the answer to (a) is "no", explain why not.

RESPONSE 6

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

- (a) Yes. See response to Question 3. Tie/Feeder lines are typically designed utilizing conductor capable of 600 amps of capacity.
- (b) Distribution Planning is consulted during the planning stage of hardening projects to ensure current load and anticipated load growth are accounted for. The main feeder and ties to other circuits are designed utilizing conductor rated for 600 amps of capacity.

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QUESTION 7

Describe the challenges or advantages entailed in increasing load capacity on a circuit that has previously been hardened with covered conductor.

RESPONSE 7

SDG&E objects to the request on the grounds set forth in General Objections Nos. 6. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E responds to this question in the context of its annual Distribution Planning Process (DPP). SDG&E plans for load growth the same way regardless of if the circuit has been hardened with covered conductor or not. As previously discussed in prior responses, SDG&E's installation of covered conductor typically involves increased load capacity as a result of the conductor size.

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QUESTION 8

Describe the challenges or advantages entailed in increasing load capacity on a circuit that has previously been hardened with underground conductor.

RESPONSE 8

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

SDG&E responds to this question in the context of its annual Distribution Planning Process (DPP). SDG&E plans for load growth the same way regardless of if the circuit has been hardened with underground conductor or not.

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QUESTION 9

Provide a list of all circuits in your system. For each circuit, provide:

- (a) Circuit ID Number
- (b) Peak load in Amperes observed since January 1, 2014.
- (c) Circuit Capacity in Amperes

RESPONSE 9

SDG&E will provide a response to this question by Thursday, August 17, 2023 as agreed upon.

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QUESTION 10

Provide updated GIS layers of primary distribution, secondary distribution, and transmission lines, with the following attributes:

- (a) Circuit ID Number
- (b) Peak load in Amperes observed since January 1, 2014.
- (c) Circuit Capacity in Amperes

RESPONSE 10

SDG&E will provide a response to this question by Thursday, August 17, 2023 as agreed upon.

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END OF REQUEST

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RESPONSE 9

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 9. Specifically, the information requested in subsection (b) is beyond the scope of data that is available for dissemination. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

(a)(b) Please see attached confidential excel spreadsheet titled “CONFIDENTIAL_CalAdvocates-SDGE-2023WMP-DR_17_Q9_CircuitMaxAmps.xlsx” and associated confidentiality declaration.

(a) (c) SDG&E has previously provided the requested Circuit ID Number and corresponding Circuit Capacity in its response to *Data Request Cal Advocates - SDGE - 04 - R2106017* within the confidential spreadsheet (“*Data Request Cal Advocates - SDGE - 04 - R2106017.xlsx*”) on February 15, 2023.

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RESPONSE 10

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 9. Specifically, the information requested in subsection (b) is beyond the scope of data that is available for dissemination. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

(b) SDG&E objects to this request on the grounds that it is overly broad and unduly burdensome, particularly when weighed against the questionable relevance of this information in assessing SDG&E's Wildfire Mitigation Plan. SDG&E's transmission system collects and stores information every 2 to 4 seconds. To pull, query, and sort this data since 2014 requires an unreasonable amount of resources to not only gather the data but to review the query results and remove anomalies that are inherent in data. Additionally, there are numerous facility ratings for our transmission system that could impact the results that have to be reviewed. SDG&E is unable to perform this work in a reasonable amount of time and believes the information already provided is sufficient to allow Cal Advocates insight into these issues.

(a)(c) Please see attached confidential GIS layers titled "SDG&E_CalPA_SDG&E_2023WMP_17.gdb" and associated confidentiality declaration.

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