

**PUBLIC ADVOCATES OFFICE DATA REQUEST: CALPA-SDGE-FIRE  
RETARDANTS-01  
SDG&E RESPONSE**

**Date Received: April 21, 2021**

**Date Submitted: May 5, 2021**

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**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.

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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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**III. RESPONSES**

**Background:** This Data Request is in relation to SDG&E's use of fire-retardants sprays.

**QUESTION 1:**

Do you currently use, or plan to use in 2021, fire retardant sprays for wildfire mitigation purposes?

- a. If so, please describe whether and how you apply these products to vegetation.
- b. If so, please describe whether and how you apply these products to distribution infrastructure.
- c. If so, please describe whether and how you apply these products to transmission infrastructure.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2 and 7. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 1:**

- a. Yes, SDG&E uses fire-retardant solutions that are applied to vegetation. This strategy was piloted in 2020. The fire retardant was applied to a two-mile long and 100-foot wide right of way (25.26 acres) in October of 2020.
- b. SDG&E has the capability to use resources to perform pole protection activities using foam for pole protection. The last time this tactic was used was during the Border fire in 2016, and it is only done with the cooperation of the agency having jurisdiction. This strategy is rarely implemented due to various factors, including but not limited to the safety of personnel, effectiveness of the products, and expected fire behavior. The application of the product is performed by SDG&E Qualified firefighters using a pump and hose with the proper mixing ratio to apply the product.
- c. SDG&E has the capability to use resources to perform pole protection activities using foam for pole protection. The last time this tactic was used was during the Border fire in 2016 and it is only done with the cooperation of the agency having jurisdiction. This strategy is rarely implemented due to various factors, including but not limited to the safety of personnel, effectiveness of the products, and expected fire behavior. The application of the product is performed by SDG&E Qualified firefighters using a pump and hose with the proper mixing ratio to apply the product.

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**QUESTION 2:**

Please describe your protocols for:

- a. The administration of fire-retardant sprays to vegetation.
- b. The administration of fire-retardant sprays to distribution infrastructure.
- c. The administration of fire-retardant sprays to transmission infrastructure.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2 and 6. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 2:**

- a. SDG&E's Fuels Management program has piloted the use of a fire-retardant solution across an approximate 25-acre section of its territory in 2020. Results are still being evaluated and will be used to develop future protocols for application.
- b. The application of the product is performed by SDG&E Qualified firefighters using a pump and hose with the proper mixing ratio to apply the product. Application is only performed in coordination with fire response agencies.
- c. The application of the product is performed by SDG&E Qualified firefighters using a pump and hose with the proper mixing ratio to apply the product. Application is only performed in coordination with fire response agencies.

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**QUESTION 3:**

Please describe your protocol for choosing what type of fire-retardant spray is used on vegetation. For example, does certain type of vegetation require different fire retardation strategies than others.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2 and 6. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 3:**

For the 2020 fire retardant pilot referenced in Question 1, SDG&E selected Phos-Chek Fortify for all vegetation types. This product can be applied by almost any standard equipment that sprays, only needs to be applied annually, and is on the Qualified Products List (QPL) by the United States Department of Agriculture and United States Forest Service.

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**QUESTION 4:**

Dating back to 2018, please list all types of fire retardants you have used.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 4, 5, and 7. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 4:**

Since 2018, Phos-Chek Fortify has been the only fire retardant used by SDG&E.

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**QUESTION 5:**

Do you currently use, or plan to use in 2021, herbicides or growth retardants on vegetation for wildfire mitigation purposes?

- a. If so, please describe how you use these products.
- b. If so, please list each such product you are using or expect to use in 2021.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2 and 6. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 5:**

- a. SDG&E Vegetation Management uses both herbicide and tree growth regulators. SDG&E's pole brush activities involve the use of a liquid blend or a granular herbicide. The granular product is applied using a handheld shaker container. The liquid blend is applied using a backpack sprayer. Both herbicides are applied on top of the cleared soil prior to the rain season. Water activates the products to reduce vegetation regrowth within the radius of the cleared poles to help maintain regulatory compliance. Tree growth regulators are applied to fast growing species to slow the regrowth. The application helps to maintain vegetation clearance from conductors for an annual cycle. The application is done at the root zone via soil injection. Where applicable, all applications require customer approval.
- b. Herbicides include:
  - a. Vastlan with MSO is applied to eradicate Century Plant
  - b. Garlon 4 and Hasten 50/50 blend is applied to prevent stump regrowth on removed trees and other woody vegetation.
  - c. SK26 (granular) and an Eco-Pak Blend (mix of Esplanade 200 SC, Portfolio 4F CA, Milestone (spot treatment label), Lifeline Herbicide (glufosinate), In-Place Deposition-Retention Agent, Syl-Tac-EA Silicone/ESO Surfactant) are used for pole brush activities
  - d. ArborLoc2sc (paclobutazol) is used as a tree growth regulator

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**QUESTION 6:**

Have you conducted any studies on the environmental impacts of using fire retardants, herbicides, or growth retardants?

- a. If so, please list the title and date of each such study.
- b. If so, please provide a copy of each such study.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, 8, and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 6:**

SDG&E has not performed any studies but has relied upon manufacturer information as well as any applicable agency qualified products, such as the USDA or United States Forest Service Qualified Products List, to determine potential environmental impacts from products used.