

**GREEN POWER INSTITUTE DATA REQUEST:
GREENPOWER-SDGE-2023WMP-02
SDG&E RESPONSE**

**Date Received: March 7, 2023
Date Submitted: March 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 undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

**GREEN POWER INSTITUTE DATA REQUEST:
GREENPOWER-SDGE-2023WMP-02
SDG&E RESPONSE**

**Date Received: March 7, 2023
Date Submitted: March 10, 2023**

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.

**GREEN POWER INSTITUTE DATA REQUEST:
GREENPOWER-SDGE-2023WMP-02
SDG&E RESPONSE**

**Date Received: March 7, 2023
Date Submitted: March 10, 2023**

QUESTION 1

Please confirm and report on the accuracy of Table 15 “Ignition Likelihood” (Column J), “Ignition Risk” (Column H), and “Overall Utility Risk” (Column G) values, in the 2022 Quarter 4 Data Report (QDR) filed on February 1, 2023.

GPI has identified a potential calculation error in the 2022 Quarter 4 Data Report (QDR) filed on February 1, 2023. The “Ignition Likelihood” field in Table 15, Column J does not equal the sum of the “Equipment Likelihood of Ignition” (Column K), “Contact from Vegetation Likelihood of Ignition” (Column L), and “Contact from Object Likelihood of Ignition” (Column M). An example is provided in Table 1. This is contrary to SCE’s Table 15 calculation method where:

$$\text{Ignition Likelihood (Column J)} = \text{SUM (Equipment Likelihood of Ignition (Column K), Contact from Vegetation Likelihood of Ignition (Column L), Contact from Object Likelihood of Ignition (Column M))}$$

An error in the “Ignition Likelihood” variable will also affect the accuracy of the “Ignition Risk” (Column H) and “Overall Utility Risk (Column G)” calculations (Table 1):

$$\text{Ignition Risk (Column H)} = \text{Ignition Likelihood (Column J)} \times \text{Wildfire Consequence (Column P)}$$

$$\text{Overall Utility Risk (Column G)} = \text{Ignition Risk (Column H)} + \text{PSPS Risk (Column I)}$$

Table 1. From SDG&E Table 15 with proposed correction in red.

Column A	Column E	Column F	Column G	Column H	Column I	Column J	Column K	Column L	Column M	Column N	Column P
Top- Risk Circuit/ Segment/ Span ID	Inclusion Reason	HFTD Area	Overall Utility Risk	Ignition Risk	PSPS Risk	Ignition Likelihood	Equipment Likelihood of Ignition	Contact from Vegetation Likelihood of Ignition	Contact from Object Likelihood of Ignition	Burn Probability	Wildfire Consequence
1215-32R	Top 5% highest risk	Tier-3	0.00220494	0.00220494	0.000000	0.00078127	0.02629638	0	0.0087678	0.017686	2.822238255
Correction			0.098959	0.09895945	0.000000	0.03506417	0.02629638	0	0.0087678		2.822238255

An error in Column J “Ignition Likelihood” can also alter circuit/segment risk ranking, the top 5% risk segment list, and resulting risk mitigation work locations.

In your response, please provide the following:

(1) The equation used to calculate “Ignition Likelihood” in the original Quarter 4 QDR filing submission (Table 15, Column J);

(2) Any necessary corrections to the “Ignition Likelihood” metric calculation including the equation used and output;

**GREEN POWER INSTITUTE DATA REQUEST:
GREENPOWER-SDGE-2023WMP-02
SDG&E RESPONSE**

**Date Received: March 7, 2023
Date Submitted: March 10, 2023**

- (3) Any corrections to the “Ignition Risk” and “Overall Utility Risk” metrics, including equations used and output;
- (4) An explanation of whether corrections from 1-3 alter the ranking of the top 5 % risk-ranked circuits/segment spans or the circuits/segments that are included in Table 15;
- (5) An updated 2022 QDR Excel workbook that includes any corrections necessary for Table 15;

RESPONSE 1

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, and 9. SDG&E further notes that, pursuant to the 2023 Wildfire Mitigation Plan Guidelines, the three business day data request turnaround does not go into effect for stakeholders until the submission of SDG&E’s Final Wildfire Mitigation Plan on March 27, 2023. SDG&E reserves the right to continue processing data request responses within the normal, 10-day turnaround, prior to March 27 and again subsequent to a decision on SDG&E’s 2023 WMP submission. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

In response to the data request for QDR Table 15 filed on February 1, 2023, SDG&E confirms the accuracy of the table as-is and, likewise, the methodology and formulas used to calculate “Ignition Likelihood” (Column J), “Ignition Risk” (Column H), and “Overall Utility Risk” (Column G).

In summary, the approach used to calculate “Ignition Likelihood” will not equal the sum of the “Equipment Likelihood of Ignition” (Column K), “Contact from Vegetation Likelihood of Ignition” (Column L), and “Contact from Object Likelihood of Ignition” (Column M) due to the disparate approaches for calculating columns L and M. Columns A, E, F, G, H, and P, are derived from the WiNGS Planning model, which has an embedded ignition adjustment process separate from the values presented in columns K, L, M, N.

More specifically, “Contact from Vegetation Likelihood of Ignition” (Column L) , “Contact from Object Likelihood of Ignition” (Column M) and “Equipment Likelihood of Ignition” are separate modules containing calculations not directly tied to “Ignition Likelihood”. Subsequently, “Ignition Risk”, the “Overall Utility Risk”, and the top 5% of risk segments will not be affected.

(1) The equation used to calculate “Ignition Likelihood” in the original Quarter 4 QDR filing submission (Table 15, Column J):

The equation used to calculate “Ignition Likelihood” (Table 15, Column J) is derived from the WiNGS Planning Ignition Rate Normalization Factor model that leverages the Likelihood of Risk Event by segment (this will be included in SDG&E’s forthcoming 2023 WMP 2023, in

**GREEN POWER INSTITUTE DATA REQUEST:
GREENPOWER-SDGE-2023WMP-02
SDG&E RESPONSE**

**Date Received: March 7, 2023
Date Submitted: March 10, 2023**

section 6.2.2.1). Ignition Likelihood is calculated using an annual ignition rate for the HFTD. The annual ignition rate is adjusted to account for local conditions including wind speed, historical tree strikes, vegetation density, asset hardening, and asset health. The normalization factor model used to leverage the ignition likelihood metric used in Table 15 is as follows:

$$\text{Adj. Ignition Rate} = \text{Initial Ignition Rate} \times \text{Ignition Adj. Factor}_i \times \text{Normalization Factor}_i$$

Where, Initial Ignition Rate is the initial ignition rate prior to implementation of adjustment factor i , Ignition Adj. Factor $_i$ is the adjustment factor metric tied to the adjustment factor i , Normalization Factor $_i$ is the normalization factor tied to adjustment factor i , Adj. Ignition Rate is the adjusted ignition rate after implementation of adjustment factor i and i is the specific adjustment factor (e.g., wind speed, tree strikes, etc.). The normalization part of the process implementation is performed to maintain the same global annual ignition rate after each adjustment step. Thereby, the ignition rate is adjusted relatively among each circuit-segment according to each individual risk factor, while the global ignition rate across the full scope of circuit-segments remains constant.

(2) Any necessary corrections to the “Ignition Likelihood” metric calculation including the equation used and output;

Due to the unassociated approaches for calculating “Ignition Risk” vs. “Contact from Vegetation Likelihood of Ignition” and “Contact from Object Likelihood of Ignition”, SDG&E does not report any corrections to the Ignition Likelihood metric, including the equation used and final output.

(3) Any corrections to the “Ignition Risk” and “Overall Utility Risk” metrics, including equations used and output;

SDG&E does not report any corrections necessary for the Ignition Risk and Overall Utility Risk metrics, including the equations used and final outputs.

(4) An explanation of whether corrections from 1-3 alter the ranking of the top 5 % risk-ranked circuits/segment spans or the circuits/segments that are included in Table 15;

(5) An updated 2022 QDR Excel workbook that includes any corrections necessary for Table 15;

SDG&E does not report a change in the top 5% of risk-ranked circuit segments and will not currently submit an updated 2022 QDR Excel workbook for Table 15.

END OF REQUEST