



## **Public Advocates Office Data Request**

**No. CalAdvocates-SDG&E-2022WMP-05**  
**Proceeding: 2022 Wildfire Mitigation Plans**

Date of issuance: Wednesday, February 16, 2022  
Response requested: Tuesday, February 22, 2022  
Objections due (if any): Tuesday, February 22, 2022

To: **Kellen Gill**

San Diego Gas & Electric Company      Email: [kgill@sdge.com](mailto:kgill@sdge.com)

**Maddy Strutner**

San Diego Gas & Electric Company      Email: [mstrutner@sdge.com](mailto:mstrutner@sdge.com)

**Laura Fulton**

San Diego Gas & Electric Company      Email: [lfulton@sdge.com](mailto:lfulton@sdge.com)

**Christopher Lyons**

San Diego Gas & Electric Company      Email: [clyons@sdge.com](mailto:clyons@sdge.com)

From: **Aaron Louie**

Analyst

Public Advocates Office

Phone: (415) 696-7316

Email: [Aaron.Louie@cpuc.ca.gov](mailto:Aaron.Louie@cpuc.ca.gov)

**Carolyn Chen**

Attorney

Public Advocates Office

Phone: (415) 703-1980

Email: [Carolyn.Chen@cpuc.ca.gov](mailto:Carolyn.Chen@cpuc.ca.gov)

**Layla Labagh**

Attorney

Public Advocates Office

Phone: (415) 696-7372

Email: [Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)

**Cal Advocates Wildfire Discovery**

Email: [CalAdvocates.WildfireDiscovery@cpuc.ca.gov](mailto:CalAdvocates.WildfireDiscovery@cpuc.ca.gov)

## INSTRUCTIONS

You are instructed to answer the following Data Request in the aforementioned proceeding, with written, accurate responses pursuant to Public Utilities Code §§ 309.5(e) and 314, Rule 1.1 of the California Public Utilities Commission's (CPUC) Rules of Practice and Procedure, and the Office of Energy Infrastructure Safety's guidelines for Wildfire Mitigation Plan (WMP) discovery.<sup>1</sup>

Restate the text of each data request question prior to providing the response. Provide the name and title of the responding individual (i.e., the person responsible for the content of your answer) for each data request question. If the responding individual is not your employee, please provide their name, title, and employer, as well as the name and title of your employee who is directly responsible for the work of the responding individual.

Please send your responses and inquiries to the originators of this data request (that is, the Public Advocates Office employees and attorneys listed on the cover page), with copies to the following representatives of the Public Advocates Office:

1. [CalAdvocates.WildfireDiscovery@cpuc.ca.gov](mailto:CalAdvocates.WildfireDiscovery@cpuc.ca.gov)
2. [Henry.Burton@cpuc.ca.gov](mailto:Henry.Burton@cpuc.ca.gov)
3. [Natalie.Monroe@cpuc.ca.gov](mailto:Natalie.Monroe@cpuc.ca.gov)
4. [Mina.Botros@cpuc.ca.gov](mailto:Mina.Botros@cpuc.ca.gov)

**Requests for Clarification:** If a request, definition, or an instruction, is unclear, please notify the originators in writing within five business days of receipt of this data request or as soon as feasible, including a specific description of what you find unclear and why. If possible, please provide a proposal for resolving the issue. In any event, unless directed otherwise by the originators, answer the request to the fullest extent possible, explain why you are unable to answer in full, and describe the limitations of your response.

**Incomplete responses:** If you are unable to answer a question completely, accurately, and with the specificity requested, notify the originators as soon as possible. If possible, please provide a proposal for resolving the issue. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

**Timing of responses:** Please respond to each question as soon as your complete response to that specific question is available, and no later than the due date listed on the cover sheet.

**Deadline extension requests:** If you are unable to provide a complete response to each question by the due date noted on the cover page, contact the originators in writing to request a deadline

---

<sup>1</sup> Office of Energy Infrastructure Safety, *Final 2022 Wildfire Mitigation Plan (WMP) Update Guidelines*, December 15, 2021. See Attachment 5: Guidelines for Submission and Review of 2022 Wildfire Mitigation Plan Updates, pp. 10-11.

extension. Please submit your deadline extension request as soon as feasible and preferably *at least* three business days before the data request is due. In your deadline extension request, please (1) specify the questions affected by the delay, (2) propose an alternative response date and (3) provide a written explanation as to why the deadline cannot be met.

**Objections:** If you object to any of portion of this Data Request, please submit your objections, including the specific legal basis for each objection, to the originators as soon as feasible, and within five business days of the issuance of this data request if possible. *At latest*, submit your objections and legal bases by the objection deadline on the cover sheet.

**Response format:** Responses should be provided in the original electronic format if available, and otherwise, in hard copy. (If available in Word or Excel format, send the Word or Excel document not a PDF file.)

- All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible.
- Each page should be numbered.
- If any of your answers rely on, refer to or reflect calculations that are not shown therein, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel spreadsheets or computer programs, with data and formulas intact and functioning.
- Voluminous documents produced in response to the data request should be Bates-numbered and indexed.
- Responses to the data request that refer to or incorporate documents should clearly identify the particular documents referenced, including the title and page number or, if available, Bates-numbers or Bates-range.

**Other questions:** For any questions, email the originators.

### **DEFINITIONS**

- A. As used herein, the terms “you,” “your(s),” “Company,” and “SDG&E” mean San Diego Gas & Electric Company and any and all of its respective present and former employees, agents, consultants, attorneys, and officials, and any and all other persons acting on its behalf.
- B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of this Data Request any information or documents which might otherwise be considered to be beyond their scope.
- C. Date ranges shall be construed to include the beginning and end dates named. For example, the phrases “from January 1 to January 31,” “January 1-31,” “January 1 to 31,” and “January 1 through January 31” should be understood to include both the 1st of January and the 31st

of January. Likewise, phrases such as “since January 1” and “from January 1 to the present” should be understood to include January 1st, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31st.

- D. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of this Data Request any information or documents which might otherwise be considered to be beyond their scope.
- E. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.
- F. The terms “document,” “documents,” or “documentary material” include, without limitation, the following items, whether in electronic form, printed, recorded, or written or reproduced by hand: reports, studies, statistics, projections, forecasts, decisions, orders, intra-office and interoffice communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, calendars, work papers, graphs, notebooks, notes, charts, computations, plans, drawings, sketches, computer printouts, summaries or records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, bulletins, records or representations or publications of any kind (including microfilm, videotape, and records however produced or reproduced), electronic or mechanical or electrical records of any kind (including, without limitation, tapes, tape cassettes, discs, emails, and records), other data compilations (including, without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, and discs and recordings used in automated data processing, together with the programming instructions and other material necessary to translate, understand, or use the same), and other documents or tangible things of whatever description which constitute or contain information within the scope of this Data Request.
- G. “Relate to,” “concern,” and similar terms and phrases shall mean to consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of this Data Request.
- H. “Identify”:
  - i. When used in reference to a Company employee, “identify” includes stating their full name and title.

- ii. When used in reference to a consultant or contractor for the Company, “identify” includes stating the person’s name, title, and employer, and the name and title of the Company employee who is directly responsible for the work of the consultant.
  - iii. When used in reference to a person who is not a current Company employee, consultant or contractor, “identify” includes stating the person’s name; most recent title and supervisor at the Company; and most recent known employer, title/position, and business address.
  - iv. When used in reference to documents, “identify” includes stating the nature of the document (e.g., letter, memorandum, study), the date (if any), the title of the document, the identity of the author, and the general subject matter of the document. For documents not publicly available, please also provide the location of the document, and identify the person having possession, control or custody of the document.
- I. When requested to “state the basis” for any statement (i.e., any analysis, workpaper, study, proposal, assertion, assumption, description, quantification, or conclusion), please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, report, and analysis available to you which you believe to support the statement, or which you contend to be evidence of the truth or accuracy thereof.
- J. “CPUC” and “Commission” mean the California Public Utilities Commission.
- K. “Cal Advocates” means the Public Advocates Office.
- L. “Energy Safety” and “OEIS” mean the California Office of Energy Infrastructure Safety.
- M. “WMP” means wildfire mitigation plan.
- N. “GIS” means Geographic Information Systems.
- O. “HFTD” means High Fire-Threat District as defined in CPUC General Order 95, Section II, item 21.2(D), and CPUC Decision 17.01.009 (pp. 39-40; Ordering Paragraphs 1 and 1(mm)) (“Fire Map 2”).<sup>2</sup> This term encompasses three areas:
- a. Tree Mortality High Hazard Zone (HHZ) 1 on the U.S. Forest Service - CAL FIRE joint map of Tree Mortality HHZs (see D.17-01-009, pp. 39-40);
  - b. HFTD Tier 2, the elevated wildfire risk area included in Shape C map of the CPUC Fire-Threat Map (“Fire Map 2”) that was adopted in D.17.01.009, pp. 39-40; and
  - c. HFTD Tier 3, the extreme wildfire risk area included in Shape C map of the CPUC Fire-Threat Map (“Fire Map 2”) that was adopted in D.17.01.009, pp. 39-40.

---

<sup>2</sup> As modified by Commission Decision 20-12-030.

- P. “Non-HFTD” means areas that are not designated as HFTD according to the definition above.
- Q. “Tier 2” means HFTD Tier 2, as defined in D.17.01.009, pp. 25, 39-40 and Ordering Paragraph 1(v).
- R. “Tier 3” means HFTD Tier 3, as defined in D.17.01.009, pp. 25, 39-40 and Ordering Paragraph 1(v).
- S. “Other HFTD” means areas outside of Tier 2 and Tier 3 that are designated as HFTD because they are included in Tree Mortality High Hazard Zone 1.
- T. “Notification” or “corrective notification” refers to a maintenance tag.

### **DATA REQUEST**

The following questions relate to your 2022 WMP Update submission.

Please note that the geographical regions are mutually exclusive (i.e., “Other HFTD” excludes areas that are in either Tier 2 or Tier 3).

#### **Question 1**

Provide an Excel table listing (as rows) all corrective notifications on electric distribution circuits that were open as of February 1, 2022, and located in HFTD areas. The table should include the following information in separate columns.

- a. Notification identification (ID) number
- b. Name of the associated circuit
- c. ID number of the associated circuit
- d. HFTD tier
- e. Geographic latitude in decimal degrees, truncated to seven decimal places
- f. Geographic longitude in decimal degrees, truncated to seven decimal places
- g. Date the notification was originally opened
- h. Priority of the original notification
- i. Due date of the original notification
- j. Date(s) the notification was reinspected or modified, if any
- k. Priority of the notification after it was reinspected or modified, if applicable
- l. Due date of the notification after it was reinspected or modified, if applicable

#### **Question 2**

Provide an Excel table listing (as rows) all corrective notifications on electric transmission circuits that were open as of February 1, 2022, and located in HFTD areas. The table should include the following information in separate columns.

- a. Notification identification (ID) number
- b. Name of the associated circuit
- c. ID number of the associated circuit
- d. HFTD tier
- e. Geographic latitude in decimal degrees, truncated to seven decimal places
- f. Geographic longitude in decimal degrees, truncated to seven decimal places
- g. Date the notification was originally opened
- h. Priority of the original notification
- i. Due date of the original notification
- j. Date(s) the notification was reinspected or modified, if any
- k. Priority of the notification after it was reinspected or modified, if applicable
- l. Due date of the notification after it was reinspected or modified, if applicable

### **Question 3**

Provide an Excel table listing (as rows) all corrective notifications on electric substations that were open as of February 1, 2022, and located in HFTD areas. The table should include the following information in separate columns.

- a. Notification identification (ID) number
- b. Name of the associated substation
- c. ID number of the associated substation
- d. HFTD tier
- e. Geographic latitude in decimal degrees, truncated to seven decimal places
- f. Geographic longitude in decimal degrees, truncated to seven decimal places
- g. Date the notification was originally opened
- h. Priority of the original notification
- i. Due date of the original notification
- j. Date(s) the notification was reinspected or modified, if any
- k. Priority of the notification after it was reinspected or modified, if applicable
- l. Due date of the notification after it was reinspected or modified, if applicable

**END OF REQUEST**

**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALADVOCATES-SDGE-2022 WMP-05  
SDG&E RESPONSE**

**Date Received: February 16, 2022  
Date Submitted: February 22, 2022**

**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



**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALADVOCATES-SDGE-2022 WMP-05  
SDG&E RESPONSE**

**Date Received: February 16, 2022**

**Date Submitted: February 22, 2022**

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.

**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALADVOCATES-SDGE-2022 WMP-05  
SDG&E RESPONSE**

**Date Received: February 16, 2022  
Date Submitted: February 22, 2022**

The following questions relate to your 2022 WMP Update submission.

Please note that the geographical regions are mutually exclusive (i.e., “Other HFTD” excludes areas that are in either Tier 2 or Tier 3).

**QUESTION 1**

Provide an Excel table listing (as rows) all corrective notifications on electric distribution circuits that were open as of February 1, 2022, and located in HFTD areas. The table should include the following information in separate columns.

- a. Notification identification (ID) number
- b. Name of the associated circuit
- c. ID number of the associated circuit
- d. HFTD tier
- e. Geographic latitude in decimal degrees, truncated to seven decimal places
- f. Geographic longitude in decimal degrees, truncated to seven decimal places
- g. Date the notification was originally opened
- h. Priority of the original notification
- i. Due date of the original notification
- j. Date(s) the notification was reinspected or modified, if any
- k. Priority of the notification after it was reinspected or modified, if applicable
- l. Due date of the notification after it was reinspected or modified, if applicable

**RESPONSE 1**

SDG&E objects to Question 1 on the grounds set forth in General Objections 2, 3, and 5. Subject to the foregoing objections, SDG&E responds as follows:

See attached file “SDGE DR05\_2022CalPA.xlsx”. The first seven items were a result of Energy Safety field inspections and were open as of February 1, 2022, but they have all been remediated and were closed by Energy Safety on February 17, 2022.

**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALADVOCATES-SDGE-2022 WMP-05  
SDG&E RESPONSE**

**Date Received: February 16, 2022  
Date Submitted: February 22, 2022**

**QUESTION 2**

Provide an Excel table listing (as rows) all corrective notifications on electric transmission circuits that were open as of February 1, 2022, and located in HFTD areas. The table should include the following information in separate columns.

- a. Notification identification (ID) number
- b. Name of the associated circuit
- c. ID number of the associated circuit
- d. HFTD tier
- e. Geographic latitude in decimal degrees, truncated to seven decimal places
- f. Geographic longitude in decimal degrees, truncated to seven decimal places
- g. Date the notification was originally opened
- h. Priority of the original notification
- i. Due date of the original notification
- j. Date(s) the notification was reinspected or modified, if any
- k. Priority of the notification after it was reinspected or modified, if applicable
- l. Due date of the notification after it was reinspected or modified, if applicable

**RESPONSE 2**

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

See attached file “SDGE DR05\_2022CalPA.xlsx”. The data provided is an export of all corrective notifications on electric transmission circuits, including for non-fire conditions. These include conditions involving equipment such as communication wires, aerial lights, and other similar components. The majority of past-due items indicated on the spreadsheet pertain to communication wire, which do not pose a fire condition. SDG&E tracks these communication related corrective notifications until the correction is completed, but the communication infrastructure providers are responsible for performing this work. Similarly, SDG&E has several pole removals that are pending communication wire transfer. The poles have been topped above the communication equipment, and SDG&E is waiting for the communication infrastructure provider to transfer or remove equipment before SDG&E can remove the structure.

**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALADVOCATES-SDGE-2022 WMP-05  
SDG&E RESPONSE**

**Date Received: February 16, 2022  
Date Submitted: February 22, 2022**

**QUESTION 3**

Provide an Excel table listing (as rows) all corrective notifications on electric substations that were open as of February 1, 2022, and located in HFTD areas. The table should include the following information in separate columns.

- a. Notification identification (ID) number
- b. Name of the associated substation
- c. ID number of the associated substation
- d. HFTD tier
- e. Geographic latitude in decimal degrees, truncated to seven decimal places
- f. Geographic longitude in decimal degrees, truncated to seven decimal places
- g. Date the notification was originally opened
- h. Priority of the original notification
- i. Due date of the original notification
- j. Date(s) the notification was reinspected or modified, if any
- k. Priority of the notification after it was reinspected or modified, if applicable
- l. Due date of the notification after it was reinspected or modified, if applicable

**RESPONSE 3**

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

See attached file “SDGE DR05\_2022CalPA.xlsx”.

**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALADVOCATES-SDGE-2022 WMP-05  
SDG&E RESPONSE**

**Date Received: February 16, 2022  
Date Submitted: February 22, 2022**

**END OF REQUEST**