

**MUSSEY GRADE ROAD ALLIANCE DATA REQUEST:
MGRA-SDGE-2023WMP-01**

Date Received: March 29, 2023

Date Submitted: April 3, 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 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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GIS Data:

Please provide the GIS data set provided to the Office of Energy Infrastructure Safety. This should be a complete and not incremental set, provided in geodatabase format. As per the WILDFIRE SAFETY DIVISION GEOGRAPHIC INFORMATION SYSTEM (GIS) DATA REPORTING STANDARD FOR CALIFORNIA ELECTRICAL CORPORATIONS – V2, February 4, 2021. Data should be current as of the last release prior to the WMP submission date.

Please remove any confidential attributes that may have been added to the requested records.

QUESTION 1

Please provide for Asset Point data for Camera, Fuse, Support Structure, and Weather Station.

RESPONSE 1

SDG&E has provided a compiled database inclusive of all 2022 data provided to Energy Safety. Please see “SDGE_MGRA_OEIS_2022.gdb.zip”

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QUESTION 2

Provide Asset Line data for Transmission Line (as permitted as non-confidential), Primary Distribution Line, and Secondary Distribution Line.

RESPONSE 2

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QUESTION 3

Provide PSPS Event data. Include Event Log, Event Line, Event Polygon data. Please exclude customer meter data. Provide all PSPS Event Asset Damage data including photos.

RESPONSE 3

SDG&E objects to the request on the grounds set forth in General Objections Nos. 1, 2, 5, 8 and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E did not have any PSPS events in 2022.

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QUESTION 4

Provide Risk Event Point data, including Wire Down, Ignition, Transmission unplanned outage (as classified non-confidential), Distribution Unplanned Outage data, Distribution Vegetation Caused Unplanned Outage, Risk Event Asset Log.

RESPONSE 4

Please see “SDGE_MGRA_OEIS_2022.gdb.zip”

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QUESTION 5

Provide photo data for Risk Events.

RESPONSE 5

SDG&E objects to the request on the grounds set forth in General Objections Nos. 1, 2, 5, 8 and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E does not currently have or provide photo data for risk events to Energy Safety.

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QUESTION 6

Under Initiatives, please provide Grid Hardening data, including Hardening Log, Hardening Point, and Hardening Line data. Inspection data is not requested at this time.

RESPONSE 6

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QUESTION 7

Under Initiatives, please provide Other Initiative data for point, line, polygon features and the Other Initiative Log.

RESPONSE 7

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QUESTION 8

Under Other Required Data, please provide Red Flag Warning Day polygon data.

RESPONSE 8

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QUESTION 9

Please provide a layer indicating calculated circuit-level risk using the methodology presented in the WMP.

- a. If independent probability and consequence layers exist, please provide these independently as well.

RESPONSE 9

Objection

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 5, 8 and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E does not currently have or provide circuit-level risk information in a geodatabase format to Energy Safety as it has not yet fully developed this capability for its quarterly submissions. SDG&E currently plans to include this data with the next QDR submission to Energy Safety.

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END OF REQUEST