

**MUSSEY GRADE ROAD
DATA REQUEST: MGRA-SDGE-2025WMP-03
SDG&E RESPONSE**

**Date Received: April 12, 2024
Date Submitted: April 17, 2024
Date Revised Question 1 and 2 Submitted: April 19, 2024**

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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SDG&E Hardening Plans 2023-2025

Cal Advocates have submitted two data requests to SDG&E, one concerning hardening activities completed in 2023 (CalPA-3.10) and once concerning planned hardening activity in 2025. (CALPA-3.8).

Please provide a version of the tables provided to Cal Advocates with the following additional information, with the following caveats:

- SDG&E may change the type and scope of its hardening during the course of the project due to unanticipated cost or technical factors
- SDG&E may remove any field which is confidential.
- The term “customers” refers to all customers served by or downstream of the circuit segment.

QUESTION 1

Provide an additional table identical to that in CalPA-3.8, but providing the additional separate columns:

- a) Number of customers served by each segment listed
- b) Total number of minutes of PSPS outage experienced by each circuit/segment since 2017.

RESPONSE 1

Please see attached spreadsheet titled “SDGE Response MGRA-SDGE-2025WMP-03_Q1.xlsx.”

Please note that SDG&E identified one project (0441-DUG-A-SUG) that was not included in its response to CALPA-3.8. SDG&E also corrected certain wildfire risk scores that were incorrect for some projects with multiple circuit segments. SDG&E has provided a revised response to Cal Advocates. The one missing project and updated wildfire risk scores are included in SDG&E’s response here.

REVISED RESPONSE 1

Please see attached spreadsheet titled “SDGE Response MGRA-SDGE-2025WMP-03_Q1_Revised 4.19.24.xlsx.”

To provide more clarity on the wildfire risk score, column e2) “Wildfire Risk Score” has been added to show the pre-mitigation score compared to the post-mitigation score. The original column e) Wildfire Risk Score originally indicated a post-mitigation score; in an effort to avoid

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confusion, the column has been explicitly renamed to “e) Wildfire Risk Score Post-mitigation”. The additional column named “e2) Wildfire Risk Score Pre-mitigation” has been added to the table to allow for understanding of the pre-mitigation wildfire risk score.

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QUESTION 2

Provide an additional table identical to that in CalPA-3.8 and containing the additional fields listed in MGRA-3-1, but for projects expected to be partially completed in 2024.

RESPONSE 2

Please see attached spreadsheet titled “SDGE Response MGRA-SDGE-2025WMP-03_Q2.xlsx.” This is a subset of the projects included in SDG&E’s response to question 1 above.

Please note that SDG&E identified one project (0441-DUG-A-SUG) that was not included in its response to CALPA-3.8. SDG&E also corrected certain wildfire risk scores that were incorrect for some projects with multiple circuit segments. SDG&E has provided a revised response to Cal Advocates. The one missing project and updated wildfire risk scores are included in SDG&E’s response here.

REVISED RESPONSE 2

Please see attached spreadsheet titled “SDGE Response MGRA-SDGE-2025WMP-03_Q2_Revised 4.19.24.xlsx.”

To provide more clarity on the wildfire risk score, column e2) “Wildfire Risk Score” has been added to show the pre-mitigation score compared to the post-mitigation score. The original column e) Wildfire Risk Score originally indicated a post-mitigation score; in an effort to avoid confusion, the column has been explicitly renamed to “e) Wildfire Risk Score Post-mitigation”. The additional column named “e2) Wildfire Risk Score Pre-mitigation” has been added to the table to allow for understanding of the pre-mitigation wildfire risk score.

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QUESTION 3

Provide an additional table identical to that in CalPA-3.10, but providing the additional separate columns:

- a) Number of customers served by each segment listed
- b) Total number of minutes of PSPS outage experienced by each circuit/segment since 2017.

RESPONSE 3

Please see attached spreadsheet titled “SDGE Response MGRA-SDGE-2025WMP-03_Q3.xlsx.”

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END OF REQUEST