

**MUSSEY GRADE ROAD
DATA REQUEST: MGRA-SDGE-2025WMP-04
SDG&E RESPONSE**

Date Received: April 25, 2024

Date Submitted: April 29, 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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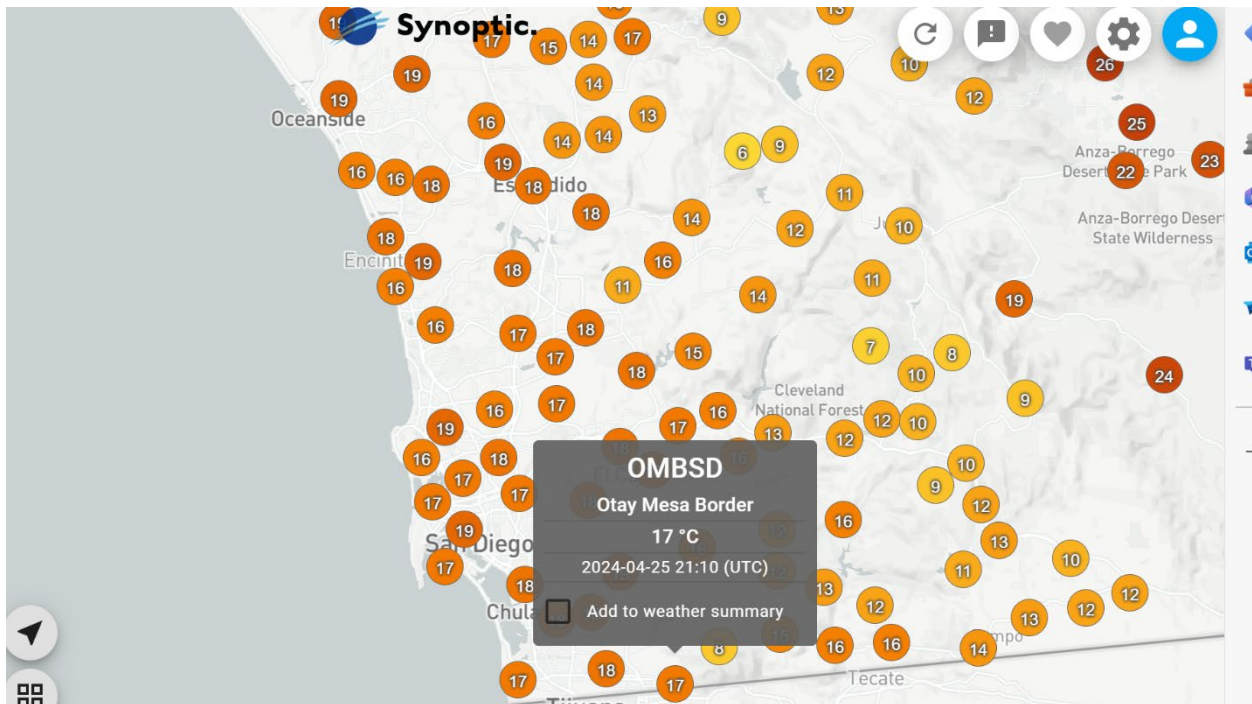
QUESTION 1

Please provide an Excel spreadsheet giving the mapping between SDG&E weather station IDs and IDs used by Synoptic for the SDG&E mesonet if these IDs are different.

RESPONSE 1

SDG&E objects to the request to the extent it is overly broad and unduly burdensome, and seeks information in a format already provided to MGRA through alternative means. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

A spreadsheet is not necessary given that the synoptic viewer aggregates all reporting weather stations. The weather stations owned by SDG&E will be three letters followed by SD. For example, Otay Mesa Border is OMBSD, which is an SDG&E weather station as shown in the screenshot below available at <https://viewer.synopticdata.com/>. The viewer is a paid service provided by Synoptic and as such is password protected. Observations can also be viewed for free at Mesowest at <https://mesowest.utah.edu/>.



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QUESTION 2

Regarding MGRA-SDGE-2025WMP-02-Q10, please provide “*SDG&E’s distribution overhead (OH) hardening study, which utilized the pre- and post-mitigation fault rates per 100 miles within in the HFTD for all risk events, incorporating location-specific data.*”

RESPONSE 2

SDG&E has attached the following two spreadsheets which include SDG&E’s distribution overhead hardening study using two different year ranges.

- “SDGE Response MGRA-SDGE-2025WMP-04_Q2.2.xlsx”, which encompasses data spanning from 2013 to 2019, resulting in an efficacy rate of 44.5%, and
- “SDGE Response MGRA-SDGE-2025WMP-04_Q2.1.xlsx”, which contains data from 2013 to 2022, yielding an efficacy rate of 27.5%.

These files incorporate raw data, from which SDG&E has derived summarized fault rates and fault rates categorized by the cause of risk events. The study focuses on pre- and post-mitigation fault rates per 100 miles within the High Fire Threat District.

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QUESTION 3

If the aforementioned study does not directly contain a breakdown of fault rates per year after installation, please provide such a breakdown in addition.

RESPONSE 3

Not applicable.

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END OF REQUEST