

ENERGY SAFETY DATA REQUEST: OEIS-SDGE-22-001
2022 WMP
SDG&E RESPONSE

Date Received: February 22, 2022
Date Submitted: February 25, 2022

I. 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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III. RESPONSES

Regarding the Maturity Survey, specifically question D.I.b “How frequently is the condition assessment updated?”:

QUESTION 1:

- a. Why is SDGE unable to improve on quarterly updates to the condition assessment (e.g., why not more frequent updates)?
- b. What is delaying updates?

RESPONSE 1:

Per 2022 Final WMP Guidance Document, Attachment 4 Maturity Model, ‘Table 2’ for Capability 16, SDG&E is interpreting question D.I.b “How frequently is the condition assessment updated” in the following two parts:

1. How long does it take for the inventory database to be updated on equipment conditions after being collected (Condition Management)?

Based on inspection results, SDG&E updates most condition assessment data in the inventory database within days after a field inspection is completed.

2. How long does it take for the inventory database to be updated on equipment inventory (Inventory Management)?

At SDG&E, reconciling of inventory in the field vs. in database (GIS, TCMDATA/EPOCH) may take up to 90 days based on the type of equipment.

- For any new equipment (design changes) installed in the field, the database gets updated within 15 days;
- Equipment that has a switch plan is updated in the database within 48 hours;
- Equipment with Corrective Maintenance Program (CMP) activities or As-Built work (i.e., changing out poles in the field) will typically get updated in the database in 90 days.

Depending on resources, priority is given to updating the database with equipment that has a switch plan and design changes. Frequency of reconciling inventory in the field vs. in database is a function of how many analysts SDG&E has for data reconciliation and mapping/records updates.

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Even though SDG&E updates condition assessments data in the inventory database within a month (which is option iv on the maturity survey), SDG&E selected 90 days (option iii) as a response to take into account the time it takes to update As-Built conditions in GIS as described in the 2nd bullet above.

Based upon discussions with SCE and PG&E to understand how they were interpreting and approaching the response to this question, SDG&E's answer may not directly align with the other utilities' response and Energy Safety's intention with the question. SDG&E updates conditions after field inspection within days, so a better response may be "monthly."

a. SDG&E updates most condition assessment data in the inventory database within days after field inspection is completed. If the intention of the question is to understand how soon we update the database after the condition is collected from the field, a more accurate response is "monthly."

b. The delay in updates or the reason for selecting 90 days as our response is explained above.

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Regarding the Quarterly Data Report:

QUESTION 2:

- a. Please either identify where the following required information can be found in SDG&E's submission (as it was not found in the QDR), provide the missing information, or provide a detailed explanation of why SDG&E cannot provide the required information:
 - i. In Table 11 (PSPS Table), columns pertaining to 2023 projections (not provided in SDG&E's submission).
 - ii. Units in Table 7.1 (Ignitions Table) were changed from "# risk events (excluding ignitions)" to "# risk events."
 - (1) Were ignitions included in the reported risk event count?
 - (2) If ignitions were included in the reported risk event count, provide an ignitions table that excludes ignitions.
 - iii. In Table 8, state of service territory for 2015-2019 (not reported in SDG&E's Table 8).
 - iv. In Table 9, actual equipment additions/removals for 2020 (not reported in SDG&E's Table 9).
 - v. In Table 7.2, HFTD Zone 1 data (missing from SDG&E's Table 7.2).
 - vi. Table 1 historic data on grid inspections changed from 2021 submission in 2022 (for example, line 1.b.ii in 2015-2017 different in 2021 and 2022 submission).

RESPONSE 2:

- a.
 - i. 2023 projections in Table 11 were populated in the 2022 version of the non-spatial data template. Following OEIS's instruction regarding an updated template for the Q4 submission, on Feb 11, 2022, SDG&E submitted the 2022 version to replace the 2021 version submitted on February 1, 2022. The updated version is titled "Attachment B Tables 1-12".
 - ii. (1) The Non-spatial template provided in the 2022 WMP Guidelines Attachment 3 shows "Number of risk events" (shown below). This column remains as it is. Table 7.1 in 2022 version only includes outage events and wire down events, SDG&E's output in table 7.1 only represents such risk events and does not include ignition events.
 - (2) All ignition events are reported in Table 7.2 based on the updated template per 2022 WMP guidelines. The updated version was submitted on February 11, 2022 and titled "Attachment B Tables 1-12".

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Utility	SDG&E	Notes:
Table No.	7.1	Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV.
Date Modified	2022 02 09	Data from 2015 - 2021 Q4 should be actual numbers. 2022 Q1 - 2024 should be projected. In future submissions update projected numbers with actuals

Table 7.1: Key recent and projected drivers of risk events											Q1	Q2	Q3	Q4	Q1
Number of risk events											2020	2020	2020	2020	2021
Risk Event category	Cause category	#	Sub-cause category	Are risk e	2015	2016	2017	2018	2019	2020	2020	2020	2020	2021	

- iii. SDG&E utilizes a live GIS system. Historical GIS data was not archived before the spatial QDR Data Requirement in late 2020. SDG&E is unable to retrieve the status of the system for the years 2015-2019.
- iv. SDG&E utilizes a live GIS system. Historical GIS data was not archived before the spatial QDR Data Requirement in late 2020. Thus, SDG&E is unable to retrieve the status of the system as of year-end 2019 and a comparison between year-end 2019 data and year-end 2020 data is not available to populate the equipment additions/removals for 2020.
- v. The HFTD Zone 1 areas within SDG&E’s service territory are located within SDG&E’s HFTD Tier 2 and Tier 3 boundaries. To avoid double-counting for risk reduction and mitigation planning (i.e. any ignition within Zone 1 would also be counted in the HFTD Tier 2/3 columns, thus potentially over or under-stating impacts depending on the circumstances), SDG&E classifies its ignitions as non-HFTD, HFTD Tier 2, and HFTD Tier 3. These classifications are reflected in Table 7.2.
- vi. As commented for line 1.a.ii “Detailed Inspection-Distribution HFTD”, the same change was made to line 1.b.ii “Detailed Inspection-Distribution Total”. In 2021 submission, the HFTD Tier 3 detailed inspections was placed in the “Other Inspection” category instead of “Detailed Inspection” category. In 2022 submission, SDG&E corrected this grouping error.

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Regarding Vegetation Management:

QUESTION 3:

- a. Table 5-2 provides SDG&E's program metrics including targets and performance. Why did SDG&E fall about 25% short of its 2021 target for “perform enhanced inspections, patrols, and trimming”?
 - i. Additionally, provide a table on the model of the example below, identifying the reasons why SDG&E fell short of this target and the portion of the target affected by that reason.

Constraint Category	Constrained Miles
Land or Environmental Hold	
Customer Refusals or Non-Contacts	
Permitting & Operational Holds	

- b. Under 7.3.5.15, Identification and remediation of “at-risk species,” SDG&E states that during this WMP cycle its enhanced vegetation management program is projected to **reduce** 0.44 ignitions by the end of 2022. Considering projected ignitions in Tier 2 and Tier 3, what is the projected ignition from vegetation contact reduction percentage attributed to enhanced vegetation management? For example: $0.44 / \text{“Projected ignitions caused by veg contact (distribution) for 2020-2022 in Tier 2+3”} = x$.
- c. On page 97, SDG&E says its Vegetation Risk Index (VRI) is instrumental for PSPS decision making. In this Section (4.5.1.2) there is no mention of VRI’s use in informing vegetation management initiatives. On page 189, SDG&E says VRI is a “decision-making regarding enhanced vegetation management work.” There are also several mentions of how SDG&E plans to use VRI in the future. Clarify how VRI is currently used and will be used in executing SDG&E’s WMP in 2022.
 - i. Is VRI currently used to prioritize high-risk areas for VM initiatives, such as inspections and enhanced vegetation management?
 - (1) If so, which VM initiatives?

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RESPONSE 3:

- a. The enhanced vegetation program includes trims and removals of targeted species within the HFTD. SDG&E's original target in 2020 and 2021 for this metric was approximately 17,000 trees annually. That original target was derived based on the known total population of "targeted species" in the HFTD (approximately 85,000) and a 5-year period for initial enhanced vegetation management efforts. In setting the target, SDG&E assumed that all 85,000 trees of the "targeted species" would be subject to enhanced trimming each year over a 5-year period – thus 85,000 trees/5 years would result in 17,000 enhanced trims annually. In putting the program in practice, however, upon performing enhanced inspections of the 17,000 trees for the year, either not all of them required enhanced pruning, or in some cases enhanced pruning was not possible. Thus, SDG&E did complete the necessary inspections, but the number of trims deemed necessary was less than SDG&E forecasted.

In 2022, SDG&E modified the annual target to approximately 12,500 trees, recognizing based on the aforementioned experience that not all trees within the original target would require trimming in any given year. The revised methodology for determining the target number of trees to perform enhanced trimming each year includes those trees that were either:

- trimmed at least 5 of the last 10 years, *or*
- trees which had no previous enhanced trim within the last 10 years, and with a current line clearance < 8 feet

The tree removal forecast was derived using the average number of removals in 2020 and 2021.

- i. The reason for not reaching the target was not due to constraints to perform the work. Per the response above, the forecast target was modified downward in 2022 from the original 17,000/year based on experience implementing the program. The 25% reduction in the actual number was not a result of constraints to perform the work, but rather the determination that the inspected trees did not require enhanced trims. SDG&E did not experience an unusual number of land constraints or customer refusals related to its enhanced vegetation management program in 2021 – the constraints described in the table were proportional to SDG&E's regular vegetation management efforts.

Using the table below

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Constraint Category	Constrained Miles
Land or Environmental Hold	
Customer Refusals or Non-Contacts	
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- b. Table 7-31 on page 298 details the calculation for the ignitions reduced due to the enhanced vegetation management program. The 0.44 ignitions number is a cumulative total for the three-year WMP period (2020-2022). The projected ignitions for the vegetation contact driver (distribution) is 1.53 ignitions between 2020-2022. Using the equation provided in the question, that would result in $0.44/1.53 = 28.8\%$ reduction percentage attributed to enhanced vegetation management.
- c. As indicated in the 2022 WMP Update, the VRI is currently a qualitative tool that can be used to focus vegetation management operations, however, is not a predictive model. The VRI is currently used in vegetation management to identify which specific circuit line segments have a low, medium, or high VRI rating. This information is displayed visually as a map layer within SDG&E's work management tool. Pre-inspectors can utilize the map layer as an added element to aid in assessing relative risk (qualitatively) during routine inspection activities. Additionally, SDG&E may use the VRI to perform targeted, off-cycle inspections to identify where additional abatement measures may be warranted. SDG&E hopes to refine the VRI model by integrating LiDAR information to provide a more complete data set of strike potential trees.

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Regarding PSPS Lessons Learned:

QUESTION 4:

- a. In Section 8.1 “Directional Vision for Necessity of PSPS,” the 2022 Wildfire Mitigation Plan Update Guidelines Template directs utilities to “[d]escribe any lessons learned from PSPS since the last WMP submission and describe expectations for how the utility’s PSPS program will evolve over the coming 1, 3, and 10 years” (p. 79). While SDG&E describes recent progress in its 2022 WMP Update with a significant focus on the past year, it doesn’t describe its expectations for the future. There is some relevant information in Table 8.1-1 “Anticipated Characteristics of PSPS Use Over Next 10 Years” (p. 353), however, Energy Safety is seeking to understand the broad, organization-wide vision for the future. Where can this information be found in the WMP Update?
 - i. If this information can’t be found in the WMP Update, please provide it.

RESPONSE 4:

To further elaborate on the efforts and vision described in the 2022 WMP Update including Section 8 and Attachment A – Long Term Visison, SDG&E is continuously exploring ways to improve its PSPS programs across the enterprise – from meteorology to customer programs to grid hardening. SDG&E has outlined several initiatives in the 2022 WMP Update designed to reduce the number customers impacted by PSPS and mitigate the impacts of PSPS for those who may continue to experience them. SDG&E uses PSPS as a last-resort tool to reduce wildfire risk in extreme circumstances. But it may be impossible to eliminate the use of PSPS as a result of ongoing changes to the climate and the cost-efficiencies of hardening efforts such as undergrounding, as discussed in SDG&E’s 2022 WMP Update.

In an effort to maintain the safety of our customers while mitigating future wildfire risk, some examples of our evolution over the next ten years based on our current trajectory are:

- Strategic undergrounding – average of 90 miles per year, 13 customers per mile will reduce customer impacts by approximately 1,170 customers per year and 11,170 customers over the next ten years.
- PSPS Sectionalizing – average of 10 devices installed per year, 371 customers per device will reduce customer impacts by approximately 3,710 per year. SDG&E will continue to investigate the locations with the largest impact to deploy these sectionalizing devices as more PSPS data is gathered over the next ten years.
- Customer Generation Programs – continuing to offer programs to our customers for backup generation or battery storage will reduce PSPS impacts to approximately 2,000 customers per year. Knowing that the rate of participation in these programs will reduce

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over time, we can anticipate a maximum of 20,000 customers seeing reduced PSPS impacts over ten years.

Having one of the leading Meteorology teams in the nation has put SDG&E at the forefront of predictive weather and fire risk modeling. In addition to all of the technological advances the Meteorology team has made and continues to make, SDG&E has been rebuilding existing weather stations to provide 30-second reads on wind speed data and adding particulate sensors to provide additional information around air quality. This will allow SDG&E to more strategically pinpoint fire weather impacts and execute PSPS events with increased precision.

SDG&E continues to focus on the safety and comfort of our customers. In order to limit the impacts of PSPS events to our customers, we have participated in customer generation programs that provide portable or fixed generators and backup batteries to our most vulnerable customers. In recent years, SDG&E has increased customer engagement and communications surrounding PSPS events. Looking forward, SDG&E will continue to engage the community and make enhancements to the PSPS notification process based on community feedback.

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