

ENERGY SAFETY DATA REQUEST: OEIS-SDGE-22-009

2022 WMP

SDG&E RESPONSE

Date Received: May 11, 2022

Date Submitted: May 16, 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

QUESTION 1:

Regarding work being performed in the top 20% of risk ranked circuits:

Please provide the percentage of work being performed in the top 20% of risk ranked circuits based on risk model output, broken down annually for 2022, 2023, and 2024, for the following:

- a. All grid hardening initiatives
- b. Covered conductor
- c. Undergrounding

RESPONSE 1:

SDG&E has 186 circuits with a wildfire risk score (non-zero). The top 20% of risk ranked circuits based on their risk model output is the top 37 circuits, including all circuits from 222 (#1) to 1233 (#37). Mileage used in the calculations of work performed in the top 20% of risk ranked circuits is based on scoped mileage. SDG&E generally scopes more work than can be constructed in a specific year to have a backlog of work available to mitigate against permitting and construction delays and maintain work for future years. Thus, some of the miles scoped in a given year and provided on the chart below may ultimately be performed in the following year. See requested annual metrics detailed below.

	2022	2023	2024
ALL GRID HARDENING INITIATIVES			
Mileage in top 20%	175.22	302.41	397.16
Total Mileage	188.57	319.66	431.74
% in Top 20	92.9%	94.6%	92.0%
COVERED CONDUCTOR			
Mileage in top 20%	71.06	153.97	115.53
Total Mileage	71.31	153.97	150.12
% in Top 20	99.7%	100.0%	77.0%
UNDERGROUNDING			
Mileage in top 20%	79.70	143.77	281.62
Total Mileage	86.89	154.27	281.62
% in Top 20	91.7%	93.2%	100.0%
TRADITIONAL HARDENING			
Mileage in top 20%	24.46	4.66	0.00*
Total Mileage	30.37	11.41	0.00*
% in Top 20	80.6%	40.9%	0.0%*

*SDG&E is in the process of phasing out traditional hardening as a WMP initiative in favor of increased deployment of covered conductor and strategic undergrounding, as demonstrated in the chart above

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QUESTION 2:

Regarding Cal Advocates' 2022 WMP DR 03:

- a. Why do the amounts of risk scores provided in “CONFIDENTIAL2021CalPA-SDGE_DR3_WF_Risk_Scores_Segment_Level_FINAL.xlsx” and “CONFIDENTIAL2021CalPA-SDGE DR03.xlsx” differ?
- b. Which number should be in the denominator when calculating the top 20% based on risk ranking?

RESPONSE 2:

a. Upon closer inspection, it was found that a small data error exists in the reported submission of the wildfire risk scores from the reported wildfire risk model used for the 2021 WMP Update specifically, as part of Cal Advocates' 2022 WMP DR 03. This error is present in the column header index 'i' as reported in file “CONFIDENTIAL2021CalPA-SDGE_DR3_WF_Risk_Scores_Segment_Level_FINAL.xlsx” and the same column header index within the 'Distribution- Q1' tab of file “CONFIDENTIAL2021CalPA-SDGE DR03.xlsx”. Please see attached file 'wf_risk_scores_corrected_for_2021_model.xlsx' for the corrected column field values for the fields described.

b. The number utilized is 186, the count of circuits with a wildfire risk score that is non-zero from the header index 'j', namely wildfire risk scores associated to the model used for the 2022 WMP Update submission.

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END OF REQUEST