

**OFFICE OF ENERGY INFRASTRUCTURE SAFETY DATA REQUEST:
OEIS-P-WMP_2023-SDGE-006
SDG&E RESPONSE**

**Date Received: June 22, 2023
Date Submitted: June 27, 2023**

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

Regarding SDG&E’s Early Fault Detection Device Installations

SDG&E aims to implement 60 node installations of early fault detection (EFD) technology per year in 2023 through 2025. These installations will be prioritized in locations of older circuits that are not expected to be “significantly hardened” in the next few years. Please provide the risk ranking from the latest WiNGS-Planning tool of the circuits, segments, spans that have been prioritized for EFD device installation, as well as any other key metrics SDG&E is using to prioritize locations for EFD device installation.

RESPONSE 1

SDG&E notes that the WiNGS Planning model is not used to scope the installation of Early Fault Detection (EFD). The WiNGS-Planning model was only used to scope covered conductor and undergrounding applications and did not inform the EFD program. For informational purposes only, attached is a spreadsheet that lists the circuits and their corresponding WiNGS-Planning Risk ranking that are planned to have Early Fault Detection (EFD) including both Advanced Radio Frequency Sensors (ARFS) and Power Quality (PQ) meters.

The EFD program takes many considerations into account when selecting the optimal circuits to deploy ARFS or PQ meter EFD.

Major criteria used to scope EFD for 2020-2022:

1. Circuits in HFTD Tier 3 or Tier 2
2. Circuits not scheduled to be rebuilt in the next 2-3 years through alternative grid hardening approaches. Other planned hardening was considered to address the need to use equipment for a reasonable life and promote cost efficiencies. This means some of the EFD circuits are usually not as high on the WiNGS model; those higher circuits are likely to be hardened with alternative methods.
3. Circuits with a history of outages related to potential ignition (i.e. undetermined cause, vegetation, animal or equipment failure)
4. Circuits with a high SAIDI/SAIFI.
5. Circuit length (for ARFS) to minimize excessive number of nodes which could extend the time to construct.
6. Circuits that are mainly overhead. Some underground segments may be considered, but every path has overhead facilities which still present a fire risk.
7. Circuits that have predicted cell reception based on provider maps. Actual cell reception was verified during initial fielding.
8. Circuits that may overlap with Falling Conductor Protection (FCP). The line monitors used for FCP are typically placed in similar locations to the EFD nodes.
9. Existing Power Quality monitors that needed to be added to the network.

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END OF REQUEST