ENERGY SAFETY DATA REQUEST: OEIS-SDGE-2023WMP-08
SDG&E RESPONSE

Date Received: August 9, 2023
Date Submitted: August 14, 2023

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 SDG&E's Risk Score Calculations

It is unclear from statements in its 2023-2025 WMP whether SDG&E uses expected or maximum value in its risk score calculations—likelihood (LoRE) multiplied by consequences (CoRE). SDG&E indicates on page 52 that "averages or expected values are used for LoRE and CoRE estimations," while it indicates on page 67 (in the WINGS-Ops Calculation Schematic) that maximum values are being used to calculate risk in two places: "Max for each asset due to fire damage" and "Outages due to max fire at asset." Please indicate whether the consequence component of SDG&E's risk score calculations (CoRE) uses expected or maximum values.

   a. If SDG&E uses maximum values in the consequence component of its risk score calculations, please indicate which maximum values it uses and explain why maximum values are used instead of expected values.

RESPONSE 1

SDG&E objects to the request on the grounds set forth in General Objections Nos. 3. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E quantifies risk consequence scores based on its Enterprise MAVF (page 52) outlined in the "RAMP – C Risk Quantification Framework and Risk Spend Efficiency" chapter.[1] This methodology is followed to calculate Risk Spend Efficiencies (RSE) for the proposed mitigations.

The WiNGS-Planning (page 66) and WiNGS-Ops (page 67) models are targeted for scenarios of weather conditions where the consequence of a potential ignition could be catastrophic. The models are designed to identify and recommend mitigations (grid hardening or PSPS, respectively between the models) to avoid a potential worst case scenario event. Consequently, the calculations incorporate maximum consequence values derived from the Technosylva modeling software, assuming unsuppressed 8-hour fire simulations during Santa Ana weather conditions.

Technosylva estimates are included in:
   - For WiNGS-Ops, the maximum number of Acres and maximum number of Buildings Destroyed estimates are used in the "Max for each asset due to fire damage" calculation steps, while maximum Rate of Spread (ROS) estimates are included in the "Outages due to max fire at asset" calculation steps.

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[1] https://www.sdge.com/sites/default/files/regulatory/SCG_SDGE_RAMP-C_Risk_Quantification_Framework_and_Risk_Spend_Efficiency_5-17-21.pdf

- For WiNGS-Planning, the maximum number of Acres and maximum number of Buildings Destroyed estimates are used in the "WRRM Conditional Impact Model."

END OF REQUEST