

**WILLIAM B. ABRAMS DATA REQUEST: ABRAMS-SDG&E-02**  
**R.18-10-007 – SB901 WILDFIRE MITIGATION PLAN OIR**  
**SDG&E RESPONSE**

**Date Received: November 11, 2019**  
**Date Submitted: November 22, 2019**

---

**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, statutory mediation confidentiality (see Cal. Evid. Code §§ 1115-28) 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.

**WILLIAM B. ABRAMS DATA REQUEST: ABRAMS-SDG&E-02  
R.18-10-007 – SB901 WILDFIRE MITIGATION PLAN OIR  
SDG&E RESPONSE**

**Date Received: November 11, 2019  
Date Submitted: November 22, 2019**

---

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.

**WILLIAM B. ABRAMS DATA REQUEST: ABRAMS-SDG&E-02  
R.18-10-007 – SB901 WILDFIRE MITIGATION PLAN OIR  
SDG&E RESPONSE**

**Date Received: November 11, 2019  
Date Submitted: November 22, 2019**

---

**III. RESPONSES**

**QUESTION 1:**

Percent Contribution of Risk (PCR) for EVERY component part across the transmission and distribution infrastructure – IOUs should refer to their field guides, whitepapers, etc. and list every component from the footing of their utility poles to the jumpers and transformers that stretch across their grid. The average contribution of risk of each and every part across their infrastructure should be indicated.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, 8 and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 1:**

SDG&E has integrated the directives established in Decision (D.) 18-12-014 and the Settlement Agreement adopted therein (SA Decision) into its existing enterprise risk management (ERM) framework for purposes of Risk Assessment Mitigation Phase (RAMP) and General Rate Case filings. The processes and methodologies adopted in D.18-12-014 are now also required for future Wildfire Mitigation Plans pursuant to D.19-05-036 at 29.

SDG&E's Risk Quantification Framework (also referred to as a Multi-Attribute Value Function or MAVF), is a tool for combining all potential consequences of the occurrence of a risk event and creates a single measurement of value. SDG&E performs a risk assessment to determine the single measurement of value, referred to as the pre-mitigation risk score. SDG&E then analyzes various mitigation activities by multiplying their respective Likelihood of Risk Event (LORE) and Consequence of Risk Event (CORE) to determine the post-mitigation risk score. Therefore, rather than assessing every component part across the transmission and distribution infrastructure, the methodology evaluates risks and mitigations in the above stated terms. All this information will be provided in SDG&E's upcoming RAMP, which will be filed by November 30, 2019.

**WILLIAM B. ABRAMS DATA REQUEST: ABRAMS-SDG&E-02  
R.18-10-007 – SB901 WILDFIRE MITIGATION PLAN OIR  
SDG&E RESPONSE**

**Date Received: November 11, 2019  
Date Submitted: November 22, 2019**

---

**QUESTION 2:**

Confidence Interval (CI) for EVERY PCR provided – IOUs should assign a CI based upon an analysis of existing data (historical, field testing, manufacturer testing) and the amount of data at hand to support the PCR concluded. If little or no data exist a CI should still be assigned based upon the subject matter experts (SME) opinion of an assigned PCR (more conclusive data = narrower CI, less conclusive data = wider CI).

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, 8 and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 2:**

Please refer to the response to Question 1 above.

**WILLIAM B. ABRAMS DATA REQUEST: ABRAMS-SDG&E-02  
R.18-10-007 – SB901 WILDFIRE MITIGATION PLAN OIR  
SDG&E RESPONSE**

**Date Received: November 11, 2019  
Date Submitted: November 22, 2019**

---

**QUESTION 3:**

Absolute Risk Reduction Ratio (ARR) and Relative Risk Reduction Ratio (RRR) for Every Proposed WMP Mitigation Tactic – IOUs should provide these measures for every proposed mitigation tactic (undergrounding, covered conductor deployment, pole wrap, etc.). If IOUs are unable or unwilling to provide this information for a particular tactic, it should be stricken from their plan as it will not provide a substantive baseline WMP.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, 8 and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 3:**

Please refer to the response to Question 1 above.

**WILLIAM B. ABRAMS DATA REQUEST: ABRAMS-SDG&E-02  
R.18-10-007 – SB901 WILDFIRE MITIGATION PLAN OIR  
SDG&E RESPONSE**

**Date Received: November 11, 2019  
Date Submitted: November 22, 2019**

---

**QUESTION 4:**

CI for EVERY PCR, ARR and RRR provided - IOUs should assign a CI based upon an analysis of existing data that demonstrates the effectiveness of a particular tactic in reducing the likelihood of utility ignitions and/or utility ignition contribution.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, 8 and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 4:**

Please refer to the response to Question 1 above.

**WILLIAM B. ABRAMS DATA REQUEST: ABRAMS-SDG&E-02  
R.18-10-007 – SB901 WILDFIRE MITIGATION PLAN OIR  
SDG&E RESPONSE**

**Date Received: November 11, 2019  
Date Submitted: November 22, 2019**

---

**QUESTION 5:**

List of Every Factor and/or Combination of Factors that Significantly Contributes to Higher Risk – IOUs should list every external (wind, humidity, fuel dryness, etc.) and internal risk factor (component age, repair timeliness, etc.) or factor combinations that change ARR or PCR by more than 5%. Where more granular scales are leveraged by an IOU to determine impacts (Beaufort Wind Scale, Keetch-Byram Drought Index, etc.) please provide that breakdown. The specific change in ARR and RRR provided by the proposed tactic should be indicated along with a CI for the assigned risk reduction ratio.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, 8 and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 5:**

Please refer to the response to Question 1 above.

**WILLIAM B. ABRAMS DATA REQUEST: ABRAMS-SDG&E-02  
R.18-10-007 – SB901 WILDFIRE MITIGATION PLAN OIR  
SDG&E RESPONSE**

**Date Received: November 11, 2019  
Date Submitted: November 22, 2019**

---

**QUESTION 6:**

List of New Technologies Identified that Significantly Reduce Risks – IOUs should provide a list of new technologies that are currently in the testing/deployment queue that are expected to change ARR or PCR by more than 5%. Please, indicate the expected variance in risk and CI associated with that risk measure described above.

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, 8 and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 6:**

Please refer to the response to Question 1 above.



**WILLIAM B. ABRAMS DATA REQUEST: ABRAMS-SDG&E-02  
R.18-10-007 – SB901 WILDFIRE MITIGATION PLAN OIR  
SDG&E RESPONSE**

**Date Received: November 11, 2019  
Date Submitted: November 22, 2019**

---

**QUESTION 7:**

Level of Effort (LOE) Measure for Tactics and Technology Deployment – IOUs should provide an indication of projected costs, man-hours and cycle/deployment timeframe associated with the implementation of each tactic (#3 above) as well as for the deployment of each new technology (#6 above).

**OBJECTION:**

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, 8 and 9. Subject to the foregoing objections, SDG&E responds as follows.

**RESPONSE 7:**

Please refer to the response to Question 1 above.