

TURN DATA REQUEST: TURN-SDG&E-03
R.18-10-007 – SB901 WILDFIRE MITIGATION PLAN OIR
SDG&E RESPONSE

Date Received: February 27, 2019
Date Submitted: March 4, 2019

QUESTION 1:

Please identify by page number, each part of your company’s WMP that will facilitate the Commission’s discharge of its responsibility under Section 8386(e) to “verify that the plan complies with all applicable rules, regulations, and standards, as appropriate.”

RESPONSE 1:

SDG&E objects on the basis that this question is vague and ambiguous, overly broad and burdensome, and seeks legal conclusions and interpretation. Notwithstanding these or any other objections, and without waiving any objection SDG&E responds as follows: The Commission has neither asked for facilitation of its responsibilities under Public Utilities Code Section 8386 (d) (which contains the phrase cited in the question), nor has it interpreted this section of the Code as to which are appropriate. SDG&E’s entire Wildfire Mitigation Plan should facilitate the Commission’s review and eventual approval of the plan. SDG&E has not performed any analysis of which parts or page(s) of its Plan would facilitate such review. Furthermore, SDG&E’s Plan as submitted may change in response to Commission review. The Commission’s verification will be of the final Wildfire Mitigation Plan in the event of such changes.

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QUESTION 2:

Please identify by page number, each part of your company’s WMP that identifies the “applicable rules, regulations, and standards.”

RESPONSE 2:

SDG&E objects on the basis that this question is vague and ambiguous, overly broad and burdensome, and seeks legal conclusions and interpretation. Notwithstanding these or any other objections, and without waiving any objection SDG&E responds as follows: SDG&E’s Wildfire Mitigation Plan identifies a number of rules, regulations and standards as listed below. However, SDG&E’s Plan did not attempt to identify every applicable rule, regulation, or standard, nor has the Commission yet ruled on which rules, regulations and standards are appropriately applied to such Plans.

The following rules, regulations, standards were mentioned in SDG&E’s Plan:

Rule, Regulation, Standard	Section	Page number(s)
18 CFR 388.113	Section 4.2.4	29-30, n.55
49 CFR 192.615	Section 6.2.3.2	79-80
AL 3177-E	Section 5.3	68-69
AL 3333-E	Section 4	19-20, n.45
California Public Resources Code (PRC) § 4292	Section 4.2.3 Section 4.3.11 Section 4.4 Section 4.4.7 Section 4.4.8 Appendix A Appendix B	28 35-36, n.60 41, n.67 45-46 46 A-12, A-35 – A-40, A-42 B-1 – B-2
California Public Resources Code (PRC) § 4293	Section 4.2.3 Section 4.4 Section 4.4.8 Section 6.2.1.4 Appendix A Appendix B	28 41, n.67 46 77 A-12, A-34 – A-39, A-42 B-1 – B-2
D.10-04-047	Section 4.2.1.2	27, n.54
D.12-04-024	Section 4.7.1 Appendix A Appendix B	54 A-52 – A-55 B-3
D.14-01-002	Section 4.3.7	33, n.57
D.14-02-015	Section 6.3.1	80-81

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Rule, Regulation, Standard	Section	Page number(s)
D.14-12-025	Section 3.1.8 Section 7.1	13, nn.29-31 82-83
D.16-06-054	Section 7.1 Appendix A Appendix B	82-83 A-1 – A-7, A-10 – A-11, A-14 – A-17, A-19, A-21 – A-22, A-30, A-32, A-34 – A-35, A-37 – A-40, A-43, A-50, A-52 – A-54, A-56, A-58 B-1 – B-3
D.16-08-018	Section 3.1 Section 3.1.8	9-10, n.19 13, n.31
D.17-12-024	Section 2.1	6-7, n.15
D.18-12-014	Section 3.1.2 Section 3.1.3 Section 3.1.6 Section 3.1.7 Section 3.1.8	11 11 12 12 13
Electric Standard Practice No. 113.1	Section 5.2.3.1 Section 5.2.3.2	65-66 67
General Order 95	Section 4.2.3 Section 4.2.3.1 Section 4.3.3 Section 4.3.6 Section 4.4 Section 4.7.1 Section 6.2.1.4 Appendix A Appendix B	28 29 30-31 32-33 41-47, n.67 54 77 A-12, A-14, A-19, A-21 – A-23, A-26 – A-27, A-32, A-34 – A-39, A-42 B-1 – B-2
General Order 112-F	Section 6.2.3.2	79-80
General Order 128	Section 4.2.3 Appendix A Appendix B	28 A-12 B-1
General Order 165	Section 4.2.1.1 Section 4.2.1.2 Section 4.3.19 Section 6.2.1.2 Appendix A Appendix B	25-26 27 40 76 A-10, A-16, A-32 B-1

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Rule, Regulation, Standard	Section	Page number(s)
General Order 166	Section 1.2	5, n.10
General Order 174	Section 4.2.2 Appendix A Appendix B	27-28 A-11 B-1
ISO 31000	Section 3.1 Section 3.1.1 Section 3.1.2	9-10, n.18 11 11
ISO 55000	Section 4.3.5 Section 7.2 Appendix A	32 83-85 A-18
North American Electric Reliability Corporation Standard FAC-003-4	Section 4.4 Appendix A Appendix B	41, n.67 A-34 – A-39, A-42 B-2
P.U. Code § 399.2(a)	Section 4.7.1 Appendix A Appendix B	54 A-52 – A-55 B-3
P.U. Code § 451	Section 4.7.1 Appendix A Appendix B	54 A-2 – A-9, A-13 – A-15, A-17 – A-18, A-22, A-24, A-25, A-28 – A-31, A-33 – A-34, A-37 – A-39, A-41, A-43, A-44 – A-57 B-1 – B-3
P.U. Code § 956.5	Section 6.2.3.2	79-80
P.U. Code § 8386(a)	Section 3.1	9-10
P.U. Code § 8386(c)	Section 1.2 Section 2 Section 3.2 Section 3.3 Section 3.4 Section 4 Section 4.1.2 Section 4.2 Section 4.3 Section 4.4 Section 4.7 Section 4.7.3 Section 5.2 Section 5.2.3 Section 5.3.1 Section 6.1	5 6 14-18 18 19 19-20 21-22 25-30 30-41 41 54 55 59 65 68-71 71-74

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Rule, Regulation, Standard	Section	Page number(s)
	Section 6.2 Section 6.3 Section 6.4 Appendix A	75 80 81 A-43
P.U. Code § 8386(c)(4)	Section 6.2	75
P.U. Code § 8386(c)(14)	Section 3.4	19, n.44
P.U. Code § 8386(e)	Section 4	19-20, n.45
P.U. Code § 8386(j)	Section 4 Section 7.1 Appendix A	19-20, n.45 82-83 A-1
Resolution ESRB-8	Section 4.7.1 Section 5.2.2.5 Appendix A Appendix B	54 63 A-52 – A-55 B-3
Resolution M-4835	Section 5.3 Section 5.3.1.2 Section 5.3.1.4 Appendix A	68, n.79 68 69 A-58
Senate Bill 901	Section 1.1 Section 7.1 Section 7.2 Appendix A	2-5, n.3 82-83 83-85 A-59
Senate Bill 1028	Section 1.2	5, n.10
Tariff Rule 20D	Section 4.3.7 Appendix A Appendix B	33, n.57 A-20 B-1

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QUESTION 3:

Please identify by page number, each part of your company’s WMP that is intended to show compliance with “applicable rules, regulations, and standards.”

RESPONSE 3:

SDG&E objects on the basis that this question is vague and ambiguous, overly broad and burdensome, and seeks legal conclusions and interpretation. Notwithstanding these or any other objections, and without waiving any objection SDG&E responds as follows:
SDG&E’s Wildfire Mitigation Plan is a forward-looking actionable plan as opposed to a document addressing an unspecified list of regulations and rules. It is also subject to change in response to Commission direction and guidance, as provided in SB 901.