ENERGY SAFETY DATA REQUEST: OEIS-SDGE-22-008
2022 WMP
SDG&E RESPONSE

Date Received: March 30, 2022
Date Submitted: April 4, 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.

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.

III. RESPONSES

QUESTION 1:

Regarding Technosylva's Risk Associated with Value Exposure (RAVE) module:

a. Please provide a list of the community factors evaluated, including the weights assigned to each factor when added to the model.

b. What is the current status of SDG&E's implementation of the RAVE module?

c. What are SDG&E's conclusions from its analysis of the RAVE module?

d. What is SDG&E's timeline for implementation of the RAVE module?

e. If the RAVE module is not currently in use, how is SDG&E accounting for community factors in the meantime? In particular, what factors are SDG&E considering regarding vulnerable communities, and how are these factors accounted for in its risk analysis and modeling, including weights?

RESPONSE 1:

a. N/A

b. SDG&E received the RAVE data in December of 2021 and is currently evaluating the incorporation of this data into current and future models.

c. N/A

d. To be determined

e. Vulnerable communities are accounted for in the PSPS risk section of the WiNGS Planning model. See Page 120, Section 4.5.1.7 Wildfire Next Generation System-Planning for details of this model. The vulnerable customers accounted for are categorized as Medical Baseline, Essential, Urgent, and Sensitive.

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QUESTION 2:

Regarding SDG&E's future undergrounding plans:

In SDG&E's 2022 WMP Update, SDG&E states that it is planning to "Significantly increase strategic undergrounding and implementation of covered conductor" (p.146) in the next 10 years.

a. Describe what SDG&E means by "significantly."

b. Provide an annual estimate of circuit miles planned for undergrounding over the next 10 years.

c. Provide an annual estimate of circuit miles planned for covered conductor installation over the next 10 years.

RESPONSE 2:

a. SDG&E plans to ramp up the Covered Conductor and Undergrounding programs to harden 100 circuit miles and underground 150 circuit miles per year beginning in 2024. Several factors may impact the ultimate feasibility of these targets, including but not limited to land (easement, rights-of-way acquisition), environmental and cultural (permitting), and construction (availability of materials and labor) constraints. SDG&E will continue to revisit and revise these estimated annual targets to reflect the latest outputs from the Wildfire Next Generation System (WiNGS) Planning Model as well as engineering, design, and construction conditions.

b/c. An annual estimate of circuit miles planned for undergrounding and covered conductor over the next 10 years are provided below. Covered conductor and undergrounding scope are based on the results of SDG&E's WiNGS-Planning Model; therefore, as the WiNGS-Planning Model is updated to account for new data (e.g., system hardening and reconfiguration, sectionalizing devices, mitigation unit costs), the scope of circuit miles for covered conductor and undergrounding will most likely change and impact the annual estimates over the next 10 years. Currently, we do not have additional mileage scoped for future mitigation. However, as SDG&E continues to advance the WiNGS-Planning Model, additional or different circuit segment mileage may be scoped.

Mitigation	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
Undergrounding	65	125	150	150	150	150	150	150	50	
Covered Conductor	60	100	100	80						

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QUESTION 3:

In SDG&E's 2022 WMP Update, SDG&E states, "Similarly, the determination of asset installation date for older assets, which is critical for failure rate calculations, requires heavy investigation into documents that are often difficult to manage or access. The PoI models rely on this foundational data infrastructure and are limited by the quality of this data" (p.90).

a. What percentage of assets are missing age installation dates within SDG&E's asset inventory?

b. Describe how SDG&E's EAMP helps to increase data quality, including in relation to missing asset installation data.

c. Describe SDG&E's additional plans and execution timelines for addressing data quality issues, including missing asset installation dates.

RESPONSE 3:

a. Of the distribution assets (poles and wires) that have been analyzed for installation dates, 0.18% of poles and 0.46% of wires are missing this value.

b. One of the current priorities of EAMP is to analyze and measure data accuracy of critical data attributes of each electric distribution asset. These baseline measurements determine which records need further investigation and remediation. Installation dates are considered critical attributes and have been the focus of current remediation activities.

c. SDG&E is undergoing an effort to measure the accuracy of data quality for each distribution asset. This will be an iterative, on-going process throughout the year to capture the accuracy percentages for each critical data attribute of each distribution asset. Poles and wires have been analyzed; switches and capacitors will be assessed within the next few months. This process will also facilitate any remediations that may be necessary based on the findings.

QUESTION 4:

Regarding SDG&E's asset inspections:

a. What percentage of inspections are completed by contractors vs. internally by SDG&E?

b. Provide a list of contractors used for asset inspections.

c. How does training for contractors performing asset inspections differ from the training for internal SDG&E personnel?

d. Provide the find rate for QA/QC of asset inspections performed by contractors.

e. Provide documentation and procedures for SDG&E's QA/QC process for asset inspections.

f. Provide the number of inspectors that performed detailed asset inspections in 2021.

g. Provide the number of detailed asset inspections performed by inspectors in 2021.

h. Provide the average circuit mile per inspector per day completed for detailed asset inspections in 2021.

RESPONSE 4:

For Substation Inspections:

a. 0% (All substation inspections are performed internally by SDG&E)

b. N/A

c. N/A

d. N/A

e. The following excerpt comes from *SOP 810.006 Substation Inspector Maintenance Order Reporting and Tracking*, and relates specifically to QA/QC.

4.1. Procedure for recording CMxO on Patrol Inspection

4.1.6. The SCM Scheduler will do a SMMS query every two weeks, just prior to the SCM Compliance and Trouble check meeting, to pull all open CMxO Patrolinsp orders.

4.1.7. Management will review open orders to ensure they are being completed prior to their severity code resolution time period.

4.3 Periodic Review Process

4.3.1. The patrol checklist shall be reviewed by the Construction Supervisor in charge of the inspectors on an annual basis.

4.3.1.1. The checklist will be reviewed for relevancy, regulatory requirements and company-specific considerations.

4.3.1.2. A CMxO will be automatically triggered for the checklist review. Any changes made to the inspection checklist will be included in the notes of the CMxO.
4.3.1.3. The Construction Supervisor will select the Project ID: dropdown CMxO Patrolinsp for the annual review CMxOReview Process.
4.3.2. The Construction Supervisor will review 10 inspections, at different substations, for each inspector. This review shall be conducted every 6 months.
4.3.2.1. The Construction Supervisor will look for all deficiencies noted and check in SMMS to ensure CMxO were opened.
SUBSTATION INSPECTOR MAINTENANCE ORDER REPORTING AND TRACKING 810.006
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4.3.2.2. The Construction Supervisor will issue a report listing the inspector, the substations, all noted deficiencies
4.3.2.3. A CMxO will be automatically triggered for the inspections review. The report will be included in the notes of the CMxO.

f. 9

g. 405

h. N/A

For Electric Distribution Inspections:

a. 18%
b. Wood pole intrusive inspections – Davey Tree
Drone inspections – HiLine Nation and its subcontractors
c. For wood pole intrusive inspections, the contractor is specifically skilled for this activity. There are no internal skilled inspectors for this type of inspection. For drone inspections, contractor Qualified Electrical Workers (QEWs) and pilots are used for capturing the drone pictures and performing the assessment in the field and using the photographs.
d. 1.2%

ESP 612 -
Distribution QA Aud

e.
f. 71
g. 38,410 poles
h. 1.7 average miles per day / per inspector

For Electric Transmission Inspections:

a. SDG&E QEW's perform 100% of detailed inspections on the transmission system. Contractors perform wood pole intrusive inspections and Drone inspections of SDG&E's transmission system.
b. HiLine Nation and its subcontractors perform the drone inspections for distribution and transmission
c. For wood pole intrusive inspections, the contractor is specifically skilled for this activity. There are no internal skilled inspectors for this type of inspection.
d. For DIAR, SDG&E has had minimal items found during QA/QC (either through review by the supervisor or by IIP) at a rate of approximately 20 items over 30,000 inspections.
e. Per TCM's maintenance practice, when an Inspector/Patrolman identifies a condition, a severity rating is assigned, which triggers the secondary assessment date by a Foreman or Supervisor. The Foreman/Supervisor may either evaluate the component/condition utilizing electronic inspection data and digital photos or conducting a field assessment. Once the component/condition has been assessed, the Foreman/Supervisor will determine appropriate follow up actions required, including feedback to Patrollers should there be findings regarding the quality of the asset inspection.
f. 5
g. 3,528 detailed asset inspections were performed in 2021.
h. Inspectors averaged 0.94 miles per day while performing detailed asset inspections in 2021.

END OF REQUEST