

**THE UTILITY REFORM NETWORK OFFICE DATA REQUEST:
TURN-SDGE-2023WMP-01
SDG&E RESPONSE**

**Date Received: May 01, 2023
Date Submitted: March 04, 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

**THE UTILITY REFORM NETWORK OFFICE DATA REQUEST:
TURN-SDGE-2023WMP-01
SDG&E RESPONSE**

**Date Received: May 01, 2023
Date Submitted: March 04, 2023**

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.

**THE UTILITY REFORM NETWORK OFFICE DATA REQUEST:
TURN-SDGE-2023WMP-01
SDG&E RESPONSE**

**Date Received: May 01, 2023
Date Submitted: March 04, 2023**

QUESTION 1

For any project included in SDG&E's Strategic Undergrounding program that was completed in 2020-2022, please identify the project by circuit or circuit segment name (the smallest applicable unit) and number of miles, and provide the RSE that SDG&E calculated for the project for:

- a. Undergrounding,
- b. Covered Conductor, and
- c. Any other alternative that SDG&E considered before opting for undergrounding.

Please provide the input data and all calculations for the RSEs in Live Excel workbook(s).

RESPONSE 1

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 3, 5, 9 and 10. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a. SDG&E did not calculate a circuit/segment-specific RSE for undergrounding on the circuits/circuit segments that were undergrounded in 2020 and 2021. Please see SDG&E's respective WMP's for 2020-2022 for the overall undergrounding RSE. SDG&E provides completed undergrounding projects for 2020 – 2022 in the file Strategic Undergrounding Projects Q1A and Q2A.xlsx and provides undergrounding RSEs for year 2022 in the file WMP_2023_TURN_DR_01_Q1_Q2.xlsx
- b. SDG&E did not calculate a circuit/segment-specific RSE for covered conductor on the circuits/circuit segments that were undergrounded in 2020 and 2021. Please see SDG&E's respective WMP's for 2020-2022 for the overall covered conductor RSE. SDG&E provides completed undergrounding projects for 2020 – 2022 in the file Strategic Undergrounding Projects Q1A and Q2A.xlsx and provides covered conductor RSEs for year 2022 in the file WMP_2023_TURN_DR_01_Q1_Q2.xlsx

**THE UTILITY REFORM NETWORK OFFICE DATA REQUEST:
TURN-SDGE-2023WMP-01
SDG&E RESPONSE**

**Date Received: May 01, 2023
Date Submitted: March 04, 2023**

- c. The overall circuit-level alternatives that SDG&E considers when assessing wildfire-mitigation grid hardening efforts are undergrounding, covered conductor, or no mitigation. If no mitigation is selected, SDG&E may still employ other wildfire mitigation strategies, including but not limited to vegetation management, avian mitigation, and advanced protection, as further detailed in SDG&E's WMP initiatives.

**THE UTILITY REFORM NETWORK OFFICE DATA REQUEST:
TURN-SDGE-2023WMP-01
SDG&E RESPONSE**

**Date Received: May 01, 2023
Date Submitted: March 04, 2023**

QUESTION 2

For any project included in SDG&E's planned Strategic Undergrounding program for completion in 2023-2025, please identify the project by circuit or circuit segment name (the smallest applicable unit) and number of miles, and provide the RSE that SDG&E calculated for the project for:

- a. Undergrounding,
- b. Covered Conductor, and
- c. Any other alternative that SDG&E considered before opting for undergrounding

Please provide the input data and all calculations for the RSEs in Live Excel workbook(s).

RESPONSE 2

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 3, 9, and 10. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a. SDG&E provides planned undergrounding projects for 2023 – 2025 in the file Strategic Undergrounding Projects Q1A and Q2A.xlsx and provides undergrounding RSEs in the file WMP_2023_TURN_DR_01_Q1_Q2.xlsx
- b. SDG&E provides planned undergrounding projects for 2023 – 2025 in the file Strategic Undergrounding Projects Q1A and Q2A.xlsx and provides covered conductor RSEs in the file WMP_2023_TURN_DR_01_Q1_Q2.xlsx
- c. The overall circuit-level alternatives that SDG&E considers when assessing wildfire-mitigation grid hardening efforts are undergrounding, covered conductor, or no mitigation. If no mitigation is selected, SDG&E may still employ other wildfire mitigation strategies, including but not limited to vegetation management, avian mitigation, and advanced protection, as further detailed in SDG&E's WMP initiatives.

**THE UTILITY REFORM NETWORK OFFICE DATA REQUEST:
TURN-SDGE-2023WMP-01
SDG&E RESPONSE**

**Date Received: May 01, 2023
Date Submitted: March 04, 2023**

QUESTION 3

For the undergrounding work described in SDG&E's 2023-2025 WMP, please describe SDG&E's policy concerning undergrounding of service connections and the removal of poles on which service connections are attached. To the extent that this determination varies by project, please describe the criteria that SDG&E uses to decide whether SDG&E undergrounds service connections in a given location.

RESPONSE 3

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2 and 3. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E's Strategic Undergrounding Program includes service conversions where primary conductor is scoped and is informed by its WiNGS-Planning risk analysis to mitigate the risk of wildfire and PSPS customer impacts. Hence, poles on which service connections are attached will be removed as part of the underground conversion unless telecommunications equipment that SDG&E does not own or maintain is also attached to the pole. In that case, the pole is topped 12"-18" above telecommunications equipment and all SDG&E electrical facilities are removed. SDG&E then transfers ownership of the pole to the telecommunications provider.

**THE UTILITY REFORM NETWORK OFFICE DATA REQUEST:
TURN-SDGE-2023WMP-01
SDG&E RESPONSE**

**Date Received: May 01, 2023
Date Submitted: March 04, 2023**

QUESTION 4

For the undergrounding work described in SDG&E's 2023-2025 WMP, please describe SDG&E's policy concerning undergrounding of secondary distribution lines (as opposed to primary lines) and the removal of poles on which secondary lines are attached. To the extent that this determination varies by project, please describe the criteria that SDG&E uses to decide whether SDG&E undergrounds secondary lines in a given location.

RESPONSE 4

SDG&E's Strategic Undergrounding Program includes the secondary distribution line conversions where primary conductor is scoped and is informed by its WiNGS-Planning risk analysis to mitigate the risk of wildfire and PSPS customer impacts. Hence, poles on which secondary is attached will be removed as part of the underground conversion unless telecommunications equipment that SDG&E does not own or maintain is also attached to the pole. In that case, the pole is topped 12"-18" above telecommunications equipment and all SDG&E electrical facilities are removed. SDG&E then transfers ownership of the pole to the telecommunications provider.

**THE UTILITY REFORM NETWORK OFFICE DATA REQUEST:
TURN-SDGE-2023WMP-01
SDG&E RESPONSE**

**Date Received: May 01, 2023
Date Submitted: March 04, 2023**

QUESTION 5

For the distribution circuits on which SDG&E has completed undergrounding as a wildfire mitigation in 2020-2022, please provide:

- a. The annual number of overhead miles of conductor removed, broken down by: primary conductor, secondary conductor, and services;
- b. The annual number of miles of underground line installed;
- c. SDG&E's best estimate (which may be a rough approximation, if that is the best estimate) of the percentage of existing poles in the affected circuits (including poles supporting primary lines, secondary lines, and services) that were removed as a result of the undergrounding work in 2020-2022. Please explain how SDG&E made this calculation and provide all inputs and assumptions.

RESPONSE 5

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 3, 5, and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a. SDG&E does not track overhead miles of conductor removed by primary, secondary, and services and therefore does not have this data to distinguish in this category. The table below represents the total miles of overhead wires removed in 2020-2022.

| Year | Total Miles Overhead Wires Removed |
|-------------|---|
| 2020 | 1.32 |
| 2021 | 6.92 |
| 2022 | 23.85 |

**THE UTILITY REFORM NETWORK OFFICE DATA REQUEST:
TURN-SDGE-2023WMP-01
SDG&E RESPONSE**

**Date Received: May 01, 2023
Date Submitted: March 04, 2023**

- b. The table below represents the total miles of underground installed and energized.

| Year | Total Miles Underground Line Installed |
|-------------|---|
| 2020 | 15.95 |
| 2021 | 26.24 |
| 2022 | 65.11 |

- c. SDG&E does not track the question as asked. To provide an estimation, SDG&E used the total number of poles removed from the design package divided by the approximate total number of poles in the circuit before these poles were removed from service.

| Circuit Number | 2020 | 2021 | 2022 |
|----------------|-------|-------|--------|
| C1030 | 0.50% | 7.38% | 17.06% |
| C1458 | | | 10.28% |
| C216 | | | 1.88% |
| C221 | 0.18% | | 0.27% |
| C358 | | | 5.30% |
| C445 | | | 0.30% |
| C448 | | 0.45% | |
| C75 | | | 2.16% |
| C79 | | 0.05% | |
| C908 | | | 0.73% |
| C972 | | | 9.98% |
| CSL1 | | | 6.18% |

**THE UTILITY REFORM NETWORK OFFICE DATA REQUEST:
TURN-SDGE-2023WMP-01
SDG&E RESPONSE**

**Date Received: May 01, 2023
Date Submitted: March 04, 2023**

QUESTION 6

For the distribution circuits on which SDG&E plans undergrounding as a wildfire mitigation in 2023-2025, please provide:

- a. The annual number of overhead miles of conductor planned to be removed, broken down by: primary conductor, secondary conductor, and services;
- b. The annual number of miles of underground line planned to be installed;
- c. SDG&E’s best estimate (which may be a rough approximation, if that is the best estimate) of the percentage of existing poles in the affected circuits (including poles supporting primary lines, secondary lines, and services) planned to be removed as a result of the planned undergrounding mileage in 2023-2025. Please explain how SDG&E made this calculation and provide all inputs and assumptions.

RESPONSE 6

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 3, 5 and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a. See response for 5a for tracking of primary, secondary and services. SUG projects are scoped by underground cable mileage to be installed, and not by overhead mileage to be removed. The overhead removal mileage will become available as design progresses. SDG&E does not currently have this information for projects scoped in 2024 and 2025. The table below represents removal miles for 2023 based solely on projects where design is complete.

| Year | Total Miles Planned Overhead Wires Removed |
|-------------|---|
| 2023 | 55.66 |
| 2024 | NA |
| 2025 | NA |

**THE UTILITY REFORM NETWORK OFFICE DATA REQUEST:
TURN-SDGE-2023WMP-01
SDG&E RESPONSE**

**Date Received: May 01, 2023
Date Submitted: March 04, 2023**

b. Provided below is total miles of underground line planned to be installed and energized.

| Year | Total Miles Planned Underground |
|-------------|--|
| 2023 | 80 |
| 2024 | 125 |
| 2025 | 150 |

c. SUG projects are scoped by underground cable mileage to be installed, and not by overhead poles to be removed. The overhead removal of poles and not yet available and will become available as design progresses. SDG&E do not currently have this information for projects scoped in 2023-2025.

**THE UTILITY REFORM NETWORK OFFICE DATA REQUEST:
TURN-SDGE-2023WMP-01
SDG&E RESPONSE**

**Date Received: May 01, 2023
Date Submitted: March 04, 2023**

QUESTION 7

With respect to the targets for 2023-2025 in the row for Strategic Undergrounding in Table 8-3 of SDG&E's 2023-2025 WMP:

- a. For each year, please provide SDG&E's estimate of the overhead circuit miles that will be replaced and explain how this estimate was determined; and
- b. For the figures provided in response to subpart "a", please provide an estimated breakdown of the overhead circuit miles planned to be replaced by: primary lines, secondary lines, and services.

RESPONSE 7

SDG&E objects to the request on the grounds set forth in General Objections Nos. 2, 3, 5, 6 and 9. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a. See response for question 6a.
- b. See response for question 5a and 6a.

**THE UTILITY REFORM NETWORK OFFICE DATA REQUEST:
TURN-SDGE-2023WMP-01
SDG&E RESPONSE**

**Date Received: May 01, 2023
Date Submitted: March 04, 2023**

END OF REQUEST