THE UTILITY REFORM NETWORK OFFICE DATA REQUEST:
TURN-SDGE-2023WMP-03
SDG&E RESPONSE

Date Received: May 16, 2023
Date Submitted: May 19, 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

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.

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QUESTION 1

Following up on the response to TURN data request 1-1 and 1-2 and particularly the file WMP_2023_TURN_DR_01_Q1_Q2. xlsx:

a. Comparing the first and second tabs of that Excel file, the RSEs for covered conductor in the first tab show significantly higher values than the RSEs for covered conductor in the second tab. Please explain why this is so, including without limitation any changes in the RSE calculation between the WINGS v1 and v2 methodology that would explain this difference.

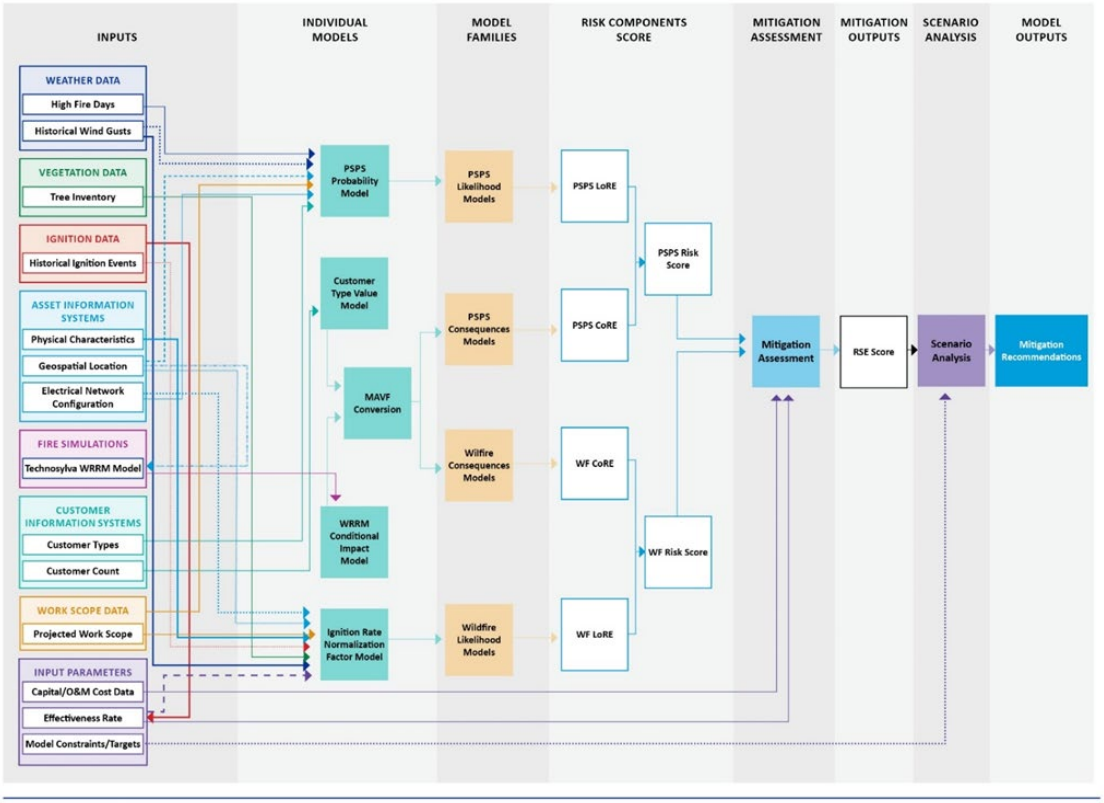
b. Comparing the first and second tabs of that Excel file, the RSEs for covered conductor in the first tab generally significantly exceed the RSEs for undergrounding in the first tab. In contrast, in the second tab, the RSEs for covered conductor generally are fairly close to the RSEs for the undergrounding. Please explain why the relationship between RSEs for covered conductor and undergrounding is so different between the two tabs, including without limitation any changes in the RSE calculation between the WINGS v1 and v2 methodology that would explain this difference.

RESPONSE 1

a. Accompanying notes provided in the third tab of the original Excel file 'WMP_2023_TURN_DR_01_Q1_Q2.xlsx' labeled 'notes' for TURN DR 1-1 and 1-2 state that "Comparison assessment between WiNGS 1.0 & 2.0 outputs cannot be performed across the board with every shared metric in the models, due to model updates and refinements made from 1.0 to 2.0. Metrics are best compared within the same model version, for most accurate comparison assessment". The explanation for specific metric differences across models that are separated by a span of over two years of model refinement and development involve a myriad of individual data points that go into the WiNGS-Planning model framework, consisting of inputs, individual sub-models, model-families, risk component scores, and mitigation assessment functions.

   See below for a brief overview of the interconnections between the components of the model that include +200 fields that go into the calculation of the various model outputs, including the WF RSE values listed in the model output.

Figure 1. WiNGS-Planning Model Process Flow Diagram



See file 'TURN-SDGE-2023_WMP-03_Question 1.xlsx' for a complete list of all substantial model feature changes between the older model version and the latest WiNGS-Planning model.

Though a myriad of factors influences the calculation of the mitigation specific WF RSE values of each circuit-segment, the following factors listed in 'TURN-SDGE-2023_WMP-03_Question 1.xlsx' play a key-role in the observed difference between the WF RSE values of going from old to the latest model:

- Update to latest average annual HFTD ignition rate
- Removal of legacy fixed project cost
- Update of Ignition-to-Wildfire Rate (SigWF) factor
- Implementation of building destroyed factor in WRRM Conditional Impact calculation for improved WF Consequence assessment

See ''TURN-SDGE-2023_WMP-03_Question 1.xlsx' for more details on these and other model differences.

b. Accompanying notes provided in the third tab of the original Excel file 'WMP_2023_TURN_DR_01_Q1_Q2.xlsx' labeled 'notes' for TURN DR 1-1 and 1-2 state that "Comparison assessment between WiNGS 1.0 & 2.0 outputs cannot be performed across the board with every shared metric in the models, due to model updates and refinements made from 1.0 to 2.0. Metrics are best compared within the same model version, for most accurate comparison assessment". The explanation for specific metric differences across models that are separated by a span of over two years model refinement and development involve a myriad of individual data points that go into the WiNGS-Planning model framework, consisting of inputs, individual sub-models, model-families, risk component scores, and mitigation assessment functions.

See Figure 1 displayed in Response 1 for a brief overview of the interconnections between the components of the model that include +200 fields that go into the calculation of the various model outputs, including the WF RSE values listed in the model output.

Though a myriad of factors influences the calculation of the mitigation specific WF RSE values of each circuit-segment, the following factors listed in 'TURN-SDGE-2023_WMP-03_Question 1.xlsx' play a key-role in the observed differences between the WF RSE values of going from old to the latest model:

- Cost-per-mile updates to Covered Conductor, Undergrounding, Traditional Hardening Conversion to Covered Conductor
- Improved implementation of UG Contingency Factor
- Implementation of Lifecycle Cost Savings in the Total Undergrounding Cost

See 'TURN-SDGE-2023_WMP-03_Question 1.xlsx' for more details on these and other model differences.

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QUESTION 2

Comparing the wildfire mitigation work proposed in SDG&E's WMP with the wildfire mitigation work proposed in SDG&E's test year 2024 GRC (A.22-05-015 et al):

a. Please describe any differences in wildfire mitigation programs proposed or volume of wildfire mitigation work proposed between the WMP and GRC for the years 2023-2025; and

RESPONSE 2

a. SDG&E has performed this analysis across its vegetation management and certain grid hardening initiatives. This analysis is found in the respective spreadsheets, "TURN_SDGE_2023WMP_03_Grid Hardening Q2_Q3.xlsx." and "TURN_SDGE_2023WMP_03_VM Q2_Q3.xlsx."

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QUESTION 3

For any differences (as described in subpart "a"), please provide a table that shows, on a program by program basis, the WMP proposal, the GRC proposal, and a description of the difference(s) between the two, including without limitation differences in volume or units of work. The table should include any wildfire mitigation programs that are proposed in one of the proceedings but not in the other.

RESPONSE 3

a. SDG&E has performed this analysis across its vegetation management and certain grid hardening initiatives. This analysis is found in the respective spreadsheets, "TURN_SDGE_2023WMP_03_Grid Hardening Q2_Q3.xlsx." and "TURN_SDGE_2023WMP_03_VM Q2_Q3.xlsx."

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END OF REQUEST