

**OFFICE OF ENERGY INFRASTRUCTURE SAFETY DATA REQUEST:
OEIS-P-WMP_2023-SDGE-005
SDG&E RESPONSE**

Date Received: June 19, 2023

Date Submitted: June 22, 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

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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

Regarding SDG&E’s Air Quality Management Program

In Section 8.3.2.4.3 “Air Quality Management Program (WMP.970)” (SDG&E’s WMP page 302), SDG&E states, “The goal of the Air Quality Management Program (WMP.970) is to protect employees from PM2.5 exposure by quickly notifying employees when PM2.5 AQI thresholds are exceeded.” Will SDGE use this program to notify its customers that PM2.5 AQI thresholds are being exceeded as well? If yes, will SDGE place this critical information in a place where customers can get real time alerts?

RESPONSE 1

The goal of SDG&E’s Air Quality Management Program is to protect employees from PM2.5 (particulate matter 2.5 microns or smaller in diameter) by quickly notifying employees when PM2.5 Air Quality Index thresholds are exceeded so they may take appropriate work precautions. Air quality conditions may be the result of wildfire smoke or other, non-wildfire related environmental conditions, however, given that smoke often impacts air quality for SDG&E emergency personnel and responders, this safety initiative was included in SDG&E’s 2023-2025 WMP. SDG&E does not currently plan to issue similar air quality warnings to the public, given the other available services that are more appropriate sources of public air quality warnings. The public can continue to obtain air quality information from the [EPA AirNow](#) or [San Diego Air Pollution Control District](#).

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END OF REQUEST