

ENERGY SAFETY DATA REQUEST: OEIS-SDGE-2023WMP-07
SDG&E RESPONSE

Date Received: August 7, 2023
Date Submitted: August 10, 2023

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.

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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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III. RESPONSES

QUESTION 1

Regarding the Progression of the Effectiveness of Enhanced Clearances Joint Study

- a. Please indicate whether the database being developed by the third-party contractor includes both outages and ignitions caused by vegetation contact.
- b. Please describe how the third-party contractor and the three large IOUs plan to use the study's data on vegetation-caused outages to assess the effectiveness of enhanced clearances.
- c. Please describe how the third-party contractor and the three large IOUs plan to use the study's data on vegetation-caused ignitions to assess the effectiveness of enhanced clearances.
- d. Please list the attributes of vegetation-caused risk events that the third-party contractor selected for alignment and/or has already aligned in the database.

RESPONSE 1

- a. Yes, the database includes both outages and ignitions caused by vegetation contact.
- b. The IOUs plan to utilize the third-party contractor's analysis to understand whether enhanced clearances (clearances greater than twelve-feet) affect the risk and frequency of outages caused by vegetation contact. The IOUs will review the analysis to draw conclusions including, but not limited to, which locations and what types of tree species should receive enhanced clearances.
- c. Similar to the response to part b, the research will additionally inform the IOUs about the effect of enhanced clearances on ignitions. The IOUs plan to utilize the results of the study to validate or explore enhancements to the current processes for determining which trees receive enhanced clearances. These enhancements could include certain portions of the service territory and certain tree species that should, or should not, receive enhanced clearances.
- d. There are thousands of variables across the different IOU databases, of which a subset are similar in terms of definition and methods of recording. The research team and IOU SMEs discussed the variables, and which might be the most instructive for understanding the effects of enhanced clearances on wildfire mitigation. Variables under discussion for the joint database include radial clearance, horizontal distance to line of tree causing outage, last vegetation maintenance date, latitude, longitude, high fire threat district, date and time of outage, tree species, ignition related to outage, tree inventory, tree growth rate, diameter at breast height of tree, outage cause codes, tree condition, tree height, forester comments, voltage of associated circuit, associated circuit, health/dead/dying tree, slope, wind direction, and terrain. The joint database is still under development, and the final variables to be used in the database will be determined over the next few months.

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END OF REQUEST