

**OFFICE OF ENERGY INFRASTRUCTURE SAFETY
DATA REQUEST: OEIS-P-CO_2024-SDGE-001
SDG&E RESPONSE**

**Date Received: January 10, 2024
Date Submitted: January 24, 2024**

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 Request to Change its 2024 Strategic Pole Replacement (WMP.1189) Target.

- a. By increasing the target for this initiative, would SDG&E increase its risk reduction value more than 25 percent?
- b. Please provide an update to the Strategic Pole Replacement row in Table 8-3, updating in particular “2024 Target & Unit” and “x% Risk Impact 2024” per SDG&E’s requested increased target.

RESPONSE 1

- a. Yes, the risk reduction value increases by 28.1%
- b.

Initiative Activity	Tracking ID	2024 Target and Unit	x% Risk Impact 2024	Comments
Strategic Pole Replacement Program	WMP.1189 (8.1.2.10.2)	200	0.1794%	Old Units
Strategic Pole Replacement Program	WMP.1189 (8.1.2.10.2)	267	0.2298%	Updated Units
Increase (%)		33.5%	28.1%	

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QUESTION 2

Regarding SDG&E's Request to Change its 2024 Distribution Infrared Inspections (WMP.481) Target

- a. Please provide the number of level 1, 2, and 3 findings from this inspection program since its inception.
- b. Provide the find rate during peak load times versus off-peak load times.
- c. Describe the barriers to testing structures during peak load times and/or explain why only 300 structures are planned for inspection during peak load times (i.e., why not more?).

RESPONSE 2

- a. The number of level 1, 2 and 3 infrared findings from the distribution infrared inspection program from 2020-2023 are provided in the table below:

	Level 1	Level 2	Level 3
Total # of Findings	1	36	15

- b. SDG&E has shifted the timeline for distribution infrared inspections to the peak load season, typically August through October, as these months will generally have more load on the circuit, allowing for the infrared inspection to more easily identify issues. It is not possible for SDG&E to provide find rates during peak load times of day versus off-peak load times because while SCADA data for distribution circuits records load data every 15 minutes, the inspection records do not include the exact time that the inspection was performed. Therefore, the inspection result cannot be correlated with peak and off-peak load data as the load fluctuates frequently throughout the day and the exact time of the inspection cannot be linked to the load at that time.
- c. Of the approximately 12,000 inspections performed on an annual basis over the last 4 years that the Distribution Infrared Program has been in effect, less than 0.5% of those annual inspections have yielded a heat anomaly related finding. Upon review of the data, we have determined that this is due in part to the rural nature of the high fire threat districts where these routine inspections have been performed. In rural areas, the number of customers served off each transformer is low, which translates to lower overall load rates even at peak times. This then leads to a lower likelihood of detecting heat anomalies that can help detect potential issues with the electrical components.

Accordingly, routine infrared inspections on distribution infrastructure in lower population dense areas does not appear to yield the highest value use of resources. In

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2024, SDG&E plans to target higher density areas within the HFTD and WUI areas to determine whether infrared inspections may provide more valuable insights. If the results of the 2024 inspections demonstrate a higher value use of infrared in higher population areas, then we may expand the number of inspections in future years. If not, then we will continue to invest resources in other enhanced routine inspection programs, such as drones, that have demonstrated value.

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END OF REQUEST