OFFICE OF ENERGY INFRASTRUCTURE SAFETY DATA REQUEST:
DR-EUP-24-01
SDG&E RESPONSE

Date Received: January 30, 2024
Date Submitted: February 13, 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

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

Undergrounding Project Phases

- How do you define an undergrounding project?
- What are the specific phases of an undergrounding project that you track? Are they aligned with the five phases listed in the CPUC SB 884 staff proposal (Scoping, Designing/Estimating, Permitting/Dependency, Ready for Construction, and Construction)?
- At what phase are you able to make comparisons with other mitigation types? How do you determine which alternative mitigations to include in the comparison?
- At what phase can you develop firm cost estimates?
- At what phase do you consider the project to be a scoped undergrounding project?
- At what phase are project ID numbers assigned? At what phase are sub-project/job ID numbers assigned?
- At what phase are precise GIS data available for the undergrounded line? What types of organizations/community partners is this information shared with and when?

RESPONSE 1

- SDG&E defines an undergrounding project as the conversion of existing overhead electric infrastructure to underground infrastructure.

- The phases of an undergrounding project tracked by SDG&E are:
  1. Project initiation
  2. Preliminary engineering and design
  3. Final design
  4. Pre-construction
  5. Construction
  6. Close out

  These phases tracked by SDG&E currently do not directly align with the five phases listed in the CPUC SB 884 staff proposal, but phases one through five tracked by SDG&E would loosely correspond to the five phases listed in the CPUC SB 884 staff proposal.

- Comparisons with other mitigation types are performed in SDG&E's Wildfire Next Generation System (WiNGS) risk analysis tool prior to phase one, project initiation. The mitigations considered in WiNGS are currently undergrounding, covered conductor, or no mitigation. These mitigations were selected as the most effective long-term solutions to reduce the risk of wildfire and PSPS. Future plans to understand the combination of mitigations, such as covered conductor combined with advanced protection initiatives, are under consideration and are planned to be included in SDG&E's 2025 WMP Update.

- Firm cost estimates are developed at the end of phase three, after civil and electrical contractors have been selected. Prior to that, SDG&E uses assumptions based on prior projects to develop cost estimates for the purposes of comparison.

- SDG&E considers the project scoped at the end of phase one. This means the project boundaries and scope of work have been determined and the project will proceed to engineering and design.

- Project ID numbers, including sub-project job ID numbers, are developed in phase one.

- Precise GIS data for the proposed undergrounded line is available at the end of phase three. The precise GIS data for the completed underground line is available at the end of phase six. Completed undergrounding project data is shared via the Quarterly Data Reports required by the Office of Energy Infrastructure Safety.

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QUESTION 2

Current Projects

- How many undergrounding projects do you currently have in each of the project phases described in Q01?
- How many project miles fall under each category?
- Are some projects comprised of multiple circuit segments or all they all individual segments? If projects are comprised of multiple segments, must those segments be continuous?

RESPONSE 2

As of February 7, 2024, the undergrounding projects and project miles in each category are:

- Phase 1 = 70 Projects;146 Miles
- Phase 2 = 59 Projects; 200 Miles
- Phase 3 = 49 Projects; 88 Miles
- Phase 4 = 0 Projects; 0 Miles
- Phase 5 = 31 Projects; 71 Miles
- Phase 6 = 43 Projects; 124 Miles

SDG&E defines a circuit segment as a contiguous portion of a circuit between two SCADA-enabled sectionalizing devices. SDG&E's scoping for undergrounding projects takes place at the circuit segment level. Full circuit segments are chosen for scoping to increase the efficiency of performing the undergrounding work across a contiguous segment, as well as achieving PSPS benefits associated with undergrounding the full segment. During design and construction, these projects will be further broken down into smaller sections. Section sizes, including scoping continuous segments, may vary depending on permitting, environmental, construction constraints, and other factors.

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QUESTION 3

Project Timeline

- Please provide an estimate of the time needed to complete an undergrounding project and approximate time needed for each phase of the project.

RESPONSE 3

The median duration of an undergrounding project from the start of design to energization is 22 months. Undergrounding project timeframes can be highly variable, however, based on complexities due to—among other things—environmental and land use sensitivities, land rights acquisitions, and permitting. Many of these variables involve issues outside of SDG&E's control, although SDG&E endeavors to plan project timelines incorporating forecasted complexities. The program has developed a standard template and timeline for each phase of a project based on historical durations. Provided below are estimates which may vary for specific projects based on complexity. Please note the sum of the times for each activity will not add up to the project time as many activities can, at least partially, be performed in parallel.

Total project time:	22 months
Design:	18 months
Procurement:	8 months
Permitting/Land Acquisition:	18 months
Bid award:	3 months
Pre-Construction:	2 months
Construction:	4 months

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QUESTION 4

Rebuild Areas

- How do you define a wildfire rebuild area?
- What is your process for determining when to underground lines in these areas?

RESPONSE 4

SDG&E defines a wildfire rebuild area as an area of electric infrastructure destroyed in a wildfire. SDG&E's current process is to rebuild overhead infrastructure with overhead, however, SDG&E would consider the impact of the wildfire and extent of rebuild, as well as the location of the rebuild area, risk factors, and input from its WiNGS planning model in any rebuild decisions.

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END OF REQUEST