

ENERGY SAFETY DATA REQUEST: OEIS-P-WMP-2024- SDGE-05
SDG&E RESPONSE

Date Received: June 5, 2024
Date Submitted: June 10, 2024

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.
10. SDG&E objects generally to each request that calls for information that contains trade

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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 SDG&E’s Emergency Preparedness Plan (WMP.1008) Projected Expenditures:

In SDG&E’s 2025 WMP Update, SDG&E stated that its projected capital expenditures for its Emergency Preparedness Plan (WMP.1008) were decreased “due to the retirement of the Noggin program within Emergency Management [...] and the consideration of other technology solutions.”¹

- a. Describe the “Noggin program.”
- b. Why was this program retired?
- c. What other “technology solutions” are being considered? Provide a list with descriptions.
 - i. What technology solutions does SDG&E currently use in place of the Noggin program?

RESPONSE 1

- a. Noggin 2.0 provides an integrated resilient workspace that combines various critical functions for risk management, business continuity, operational resilience, incident and crisis management, and security and safety operations. It provides a unified solution to enhance resilience through cloud based customizable forms intended to integrate various data sources, mapping and collection of data from responders across the organization that would include reporting and secure external data access.
- b. SDG&E has elected to rely primarily on MS Teams for communications and operations for efficiency. In preliminary exploration and use of the Noggin tool for emergency management, SDG&E discovered that using an existing system that users were familiar with (such as Teams) would promote efficiency and be more streamlined in documentation development and organization. The Noggin tool has not been completely retired but remains as a backup solution intended for use when the primary resource MS Teams is not available. The updated projected capital expenditures is a result of scaling back the scope of expanding and updating the tool as it is positioned to be a backup tool for Emergency Management
- c. Because SDG&E has elected to rely primarily on MS Teams for these capabilities, additional technology solutions are not currently under consideration. The existing technology solution of MS Teams was what SDG&E was referencing in its WMP Update. Other similar tools include:
 - Juvare's WebEOC, a secure, Internet-based emergency information management application used by various government and public safety groups. Facilitating real-time

¹ SDG&E’s 2025 WMP Update (May 14, 2024), p. 38.

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information sharing during critical activations, emergencies, or disasters. With WebEOC we can maintain a unified operating picture, collaborate effectively, and simplify routine tasks. The platform offers flexible data and process workflows, robust mapping capabilities, and streamlined navigation.

- Noggin platform as described as above.
- i. Other technology SDG&E currently uses in place of the Noggin Program include:
- MS Teams
 - Excel
 - Word

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QUESTION 2

Regarding SDG&E’s Public Emergency Communication Strategy (WMP.563) Projected Expenditures:

SDG&E’s 2025 WMP Update shows an increase in projected capital expenditures and a decrease in projected O&M expenditures for SDG&E’s Public Emergency Communication Strategy initiative (WMP.563).² SDG&E explained that the increase in projected capital expenditures is “due to an increase in scope of the Public Safety Partner Portal.”³ However, SDG&E does not provide an explanation for the decrease in projected O&M expenditures for this initiative from \$6,381,000 to \$5,219,000.

- a. Provide SDG&E’s justification for the decrease in O&M expenditures for this initiative.

RESPONSE 2

SDG&E IT based the projections on what, at the time, was their current process. In 2024, IT transitioned to an Agile work process, which promotes efficiencies and aided in achieving cost savings. The updated projections using the Agile process forecast a decrease in the O&M expenditure.

² SDG&E’s 2025 WMP Update (May 14, 2024), Table 7 “Qualifying Changes in Expenditures only (in Thousands),” p. 22.

³ SDG&E’s 2025 WMP Update (May 14, 2024), p. 38.

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END OF REQUEST