

**OEIS DATA REQUEST: OEIS-P-WMP\_2025-SDGE-01**  
**SDG&E RESPONSE**

**Date Received: 04-23-2025**  
**Date Submitted: 04-28-2025**

**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 Petition to Amend Requirements

Energy Safety’s WMP Guidelines, Chapter IV - Petition to Amend, require that the electrical corporation provide, “For each amendment, the page number(s) of the GRC decision where the decision is in conflict with the approved WMP.”

Of SDG&E’s 17 amendment requests, it provided GRC decision page numbers for 3 requests to the following initiatives: Fuel Management (WMP.497) Covered Conductor (WMP.455), and Detailed Vegetation Inspection (WMP.494). For each of the remaining 14 amendment requests, SDG&E must provide the page number from its GRC decision where the decision conflicts with its approved 2023-2025 Base WMP.

SDG&E may also include information in response to this question to provide additional explanation as to how the GRC decision conflicts with the approved WMP.

**RESPONSE 1**

SDG&E’s pending Petition to Amend requests changes for 2024 to the following programs:

- Distribution Communications Reliability Improvements (WMP.549)
- Standby Power Program (WMP.468)
- Drone Assessments (WMP.552)
- Distribution Infrared Inspections (WMP.481)
- Fuels Management (WMP.497)

SDG&E’s 2024 General Rate Case Decision, D.24-12-074, was approved by the CPUC on December 19, 2024. Given the timing of the CPUC’s approval, for 2024, operational decision-making for SDG&E’s WMP programs was not based on the 2024 GRC Decision. As discussed in the Summary of its Petition to Amend on page 2, “...without such guidance, SDG&E based its wildfire-mitigation spending for 2024 on the Settlement Agreement with Cal Advocates, which was ultimately rejected by the CPUC.” SDG&E relied upon the agreed-upon cost forecasts put forth in the Settlement Agreement because this was the best information available at the time on the potential GRC outcome and, as the CPUC itself states, “[t]he Commission has long favored the settlement of disputes.”<sup>1</sup> The Settlement Agreement is discussed in the 2024 GRC Decision on

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<sup>1</sup> D.24-12-074 at 910.

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pages 924-928. Additional details of the agreed-upon cost forecasts in the Settlement Agreement are provided in the Motion for Adoption of Settlement, Attachment C on pages 2, 6, and 7.<sup>2</sup>

For 2025, SDG&E's Petition to Amend requests changes to the following programs:

- Strategic Pole Replacement Program (WMP.1189)
- Transmission OH Hardening (WMP.543)
- Distribution Communications Reliability Improvements (WMP.549)
- Drone Assessments (WMP.552)
- Lightning Arrester Removal/Replacement (WMP.550) à Also point to Finding of Fact 175 at 990
- Connectors, including hotline clamps (WMP.464)
- Avian Protection (WMP.972)
- Expulsion Fuse Replacement (WMP.459)

GRC authorized funding for the above programs are subject to the adopted post-test year ratemaking company-wide percentage.

To establish funding in GRCs, the CPUC generally performs a detailed review of the test year and determines the post-test years (the remaining years of the GRC cycle) based on an escalation-based mechanism, as the CPUC explains:

“The Commission’s decision is based on its extensive review of the test year forecasts. The post-test year revenue requirements are typically determined by (1) escalating the test year O&M expenses, and (2) authorizing capital expenditures at a level determined by either (i) applying additional escalation factors, or (ii) further review of the applicant utility’s actual capital budgets for those years.”<sup>3</sup>

SDG&E's 2024 GRC Decision determined funding consistent with the above description. For the post-test years of 2025-2027, the 2024 GRC Decision “adopts a base margin revenue (O&M and capital revenue requirement) increase of 3 percent each year for 2025, 2026, and 2027 plus certain wildfire mitigations, including undergrounding and covered conductor.”<sup>4</sup> Because of the CPUC's adopted post-test year treatment, the only programs in the 2024 GRC Decision that have explicit funding are undergrounding and covered conductor.

For undergrounding and covered conductor, the CPUC authorized capital expenditures and miles based on TURN's position, as shown below.<sup>5</sup>

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<sup>2</sup> Available here: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M520/K647/520647938.PDF>.

<sup>3</sup> D.20-01-002 at 8.

<sup>4</sup> D.24-12-074 at 895-896.

<sup>5</sup> D.24-12-074 at 472.

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**Table 19.13  
All Hardening Miles and Costs: TURN vs. SDG&E<sup>1520</sup>**

	2024	2025	2026	2027	Total
	<b>Total Miles - Hardening (UG + CC)</b>				
TURN	135	135	135	135	540
SDG&E	185	190	200	210	785
	<b>Total Costs - Hardening (Millions of 2021 Dollars)</b>				
TURN	\$154.5	\$166.5	\$167.4	\$168.6	\$657.0
SDG&E	\$354.8	\$466.1	\$500.1	\$537.3	\$1,858.3

The 2025-2027 funding for all other programs, including all other wildfire mitigation programs, are determined by taking the total company base margin revenue (revenue requirement) and adding 3% escalation. The revenue requirements authorized for 2025-2027 are shown in Table 47.4 in the 2024 GRC Decision, provided for reference below.<sup>6</sup> Table 47.4 also includes the revenue requirement associated with TURN's undergrounding and covered conductor position.

SDG&E	2024	2025	2026	2027
<b>3% Revenue Requirement increase + cap exception for WMP (\$ million)</b>				
\$ increase 3%		\$ 114.5	\$ 84.5	\$ 87.0
Grid Design & System Hardening		\$ 32.5	\$ 66.6	\$ 101.2
Total Revenue Requirement	\$ 2,698.9	\$ 2,845.9	\$ 2,964.5	\$ 3,086.2
<b>Total Increase (\$)</b>		<b>\$ 147.0</b>	<b>\$ 118.6</b>	<b>\$ 121.7</b>
<b>Total Increase (%)</b>		<b>5.45%</b>	<b>4.17%</b>	<b>4.11%</b>

A detailed breakdown of the authorized operations and maintenance costs and capital expenditures for 2025 in the GRC Decision for all programs (except undergrounding and covered conductor) does not exist. Please refer to the discussion in the 2024 GRC Decision on pages 891-909.

See D.24-12-074, Finding of Fact 173 at 990 for Strategic Undergrounding (WMP.473). The Decision authorizes 35 miles/year for the test year 2024 and each post-test year 2025-2027, which totals 140 miles of undergrounding. SDG&E completed 112 miles in 2024, and therefore is authorized to underground the remaining 28 miles in 2025.

See D.24-12-074, Finding of Fact 178 at 991 for Pole Clearing (WMP.512).

<sup>6</sup> D.24-12-074 at 909.

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**QUESTION 2**

Regarding WMP Initiatives and Nomenclature in the CPUC's GRC Decision

For each WMP "category" or "program" discussed in Section 19.3 Wildfire Mitigation and Vegetation Management of the CPUC's GRC decision, SDG&E must provide the corresponding 2023-2025 Base WMP initiative titles and utility mitigation activity tracking IDs. If there is no corresponding ID, provide the section(s) and page number(s) where the corresponding WMP initiative is described in SDG&E's WMP.

**RESPONSE 2**

See attached Excel spreadsheet titled, "SDGE Response OEIS-P-WMP\_2025-SDGE-01\_Q2.xlsx."

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**END OF REQUEST**