

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-07
SDG&E RESPONSE

Date Received: 05-24-2025
Date Submitted: 05-29-2025

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 Worse Weather Days:

a. In response to MGRA Data Request 3 Question 5, SDG&E provided a list of the 125 worst fire weather days. Provide an updated list of these weather days with the following information for each day:

- i. Wind speed (mph)
- ii. Wind gust (mph)
- iii. Temperature (F)
- iv. Humidity levels (%)
- v. FPI rating

RESPONSE 1

Refer to the attached spreadsheet titled “SDGE Response OEIS-P-WMP_2025-SDGE-07_Q1&Q4.xlsx” for daily FPI data and hourly wind gust measurements across the SDG&E service territory, Tier-2 and Tier-3 areas. The slicer allows toggling between mean and maximum hourly values.

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QUESTION 2

Regarding OEIS Table 6-4:

a. In response to OEIS-P-WMP_2025-SDGE-05, Question 14, SDG&E provided an updated “OEIS Table 6-4: Summary of Risk Reduction for Top-Risk Circuits,” that included additional columns for completed and planned hardening. Provide an expanded version of OEIS Table 6-4 with the following additional columns:

- i. 2026 planned undergrounding (circuit mileage)
- ii. 2027 planned undergrounding (circuit mileage)
- iii. 2028 planned undergrounding (circuit mileage)
- iv. 2026 planned covered conductor (circuit mileage)
- v. 2027 planned covered conductor (circuit mileage)
- vi. 2028 planned covered conductor (circuit mileage)
- vii. 2026 planned traditional hardening (circuit mileage)
- viii. 2027 planned traditional hardening (circuit mileage)
- ix. 2028 planned traditional hardening (circuit mileage)

RESPONSE 2

Please refer to the tab titled “Question 2” in the attached spreadsheet titled “SDGE Response OEIS-P-WMP_2025-SDGE-07_Q2&Q3.xlsx” for the requested table 6-4 in the Question 2 tab.

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QUESTION 3

Regarding Cost Benefit Ratios (CBR):

a. Provide a list via Excel of all undergrounding and combined covered conductor projects planned for 2026-2028 with the following columns:

- i. Circuit/circuit segment ID
- ii. Type of hardening (undergrounding or combined covered conductor)
- iii. Year for planned project (2026, 2027, or 2028)
- iv. Circuit mileage of project
- v. Overall utility risk score
- vi. CBR for undergrounding used for decision-making
- vii. Risk reduction for undergrounding used for decision-making
- viii. CBR for combined covered conductor used for decision-making
- ix. Risk reduction for covered conductor used for decision-making

RESPONSE 3

Please refer to the tab titled “Question 3” in the attached spreadsheet titled “SDGE Response OEIS-P-WMP_2025-SDGE-07_Q2&Q3.xlsx.”

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QUESTION 4

Regarding Financial Risk:

a. In response to OEIS-P-WMP_2025-SDGE-05, Question 15, SDG&E provided an updated version of “OEIS Table 6-1: List of Prioritized Areas in an Electrical Corporations Service Territory Based on Overall Utility Risk,” breaking out risk score components. Building upon the updated table provided in the response, provide an updated version of OEIS Table 6-1 via Excel with the following additional columns:

- i. Financial Risk Score Component of Wildfire Risk Score attributed to buildings burned.
- ii. Financial Risk Score Component of Wildfire Risk Score attributed to acres burned.

RESPONSE 4

Refer to the "Acres-Structure %" tab in the attached spreadsheet titled “SDGE Response OEIS-P-WMP_2025-SDGE-07_Q1&Q4.xlsx” to review the risk distribution for approximately 164,000 structures, based on SDG&E’s assumptions of \$1 million per structure lost and \$2,350 per acre burned.

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END OF REQUEST