

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-018
SDG&E RESPONSE

Date Received: 10-08-2025
Date Submitted: 10-13-2025

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 Vegetation Management QA/QC Compliance-Specific Pass Rate:

On pages 265 and 266 of its 2026-2028 Base WMP R2, SDG&E listed criteria for its audits of vegetation management activities. SDG&E indicated that “[t]here is no weighting of these criteria. A failure of one criterion results in the failure of the audit sample unit.” Several of SDG&E’s audit criteria are unrelated to regulatory compliance (e.g., “incorrect city”). Thus, SDG&E may fail an audit even if all vegetation is compliant with regulations (e.g., distance requirements pursuant to GO 95, Rule 35).

a. Is SDG&E able to calculate a pass rate to estimate the percentage of its system’s circuit miles that are in compliance with regulatory clearance distance requirements?

i. If yes, describe how SDG&E uses its enterprise system (e.g., PowerWorkz) to review compliance-specific pass rates.

ii. If yes, indicate at what level of granularity SDG&E reviews compliance-specific pass rates (e.g., vegetation management area, circuit, circuit protection zone, etc.).

iii. If no, describe how SDG&E monitors its system’s state-of-compliance with regulatory clearance distance requirements.

RESPONSE 1

a. Yes.

i. Though it is possible to infer compliance with regulatory clearances using the enterprise system (e.g., PowerWorkz), SDG&E does not use the QA/QC activity to calculate a compliance-specific pass rate. SDG&E can derive compliance at a point-in-time for a specific area (e.g., VMA) using the clearance values that are recorded as an attribute within the tree records. For example, reviewing pass rates obtained during the pre-inspection audit, can provide a statistical basis for determining a compliance pass rate for the VMA prior to trimming. However, that pass rate would no longer be applicable at the time of the post-trim audit because at the time of that activity the trees have already been trimmed. SDG&E does not currently perform a specific audit to monitor its system’s state-of-compliance with regulatory distance requirements.

ii. Please see response to “i.” above.

iii. Please see response to “i.” above.

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QUESTION 2

Regarding SDG&E's Vegetation Management QA/QC Sample Units:

On page 263 of its 2026-2028 Base WMP R2 in "OEIS Table 9-6: Vegetation Management QA and QC Activity Targets," SDG&E indicated that the "Population / Sample Unit" for its audit of Detailed Inspections activity is both "Circuit Miles" (WMP.1502) and "Inspections" (WMP.494). On page 264 of its 2026-2028 Base WMP R2, SDG&E indicated that the "Population / Sample Unit" of its Prune and Removal activity is both "Circuit Miles" (WMP.1511) and "Trees trimmed/removed" (WMP.1492). It is unclear whether SDG&E audits the entire length of a randomly-selected circuit mile, or if it only audits infrastructure directly around where specific inspections and prune/removal activities took place.

- a. For SDG&E's audit of its Detailed Inspections activity:
 - i. If SDG&E randomly selects inspections, how does it audit to meet the circuit miles target in OEIS Table 9-6?
 - ii. If SDG&E randomly selects circuit miles, how does it audit to obtain the inspection target in OEIS Table 9-6?
- b. For SDG&E's audit of its Prune and Removal activity:
 - i. If SDG&E randomly selects trees trimmed/removed, how does it audit to meet the circuit miles target in OEIS Table 9-6?
 - ii. If SDG&E randomly selects circuit miles, how does it audit to obtain the trees trimmed/removed target in OIES Table 9-6?

RESPONSE 2

a.i. SDG&E does not audit the entire length of a randomly selected circuit mile. The circuit mile target represents the aggregate miles where the Detailed Inspection audits and the Prune and Removal audits occur.

During the Detailed Inspection activity, all inventory units are field-assessed, and the associated tree records are updated. For the Detailed Inspections audit activity, SDG&E selects a randomized, representative sample of completed work units (tree inspections) within each individual VMA. The sample population in each VMA is dependent on the total population of inventory trees within the VMA. SDG&E audits approximately 15% of all completed tree inspection units.

To derive the circuit miles audited, SDG&E geospatially links the sampled tree locations to the associated electric assets. This spatial linkage allows SDG&E to calculate the circuit mileage

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represented by the audited inspection units (trees). On average, the circuit mileage resulting from this geospatial association aligns with the circuit-mile sample size targets in OEIS Table 9-6.

In summary, while the Detailed Inspection audit sample is selected on a tree-unit basis, the geospatial association of those trees to their overheard infrastructure provides the circuit-mile target, ensuring alignment with both tree-unit and circuit mileage targets.

a.ii. Please see response to a.i above.

b.i. SDG&E does not audit the entire length of a randomly selected circuit mile. The circuit mile target represents the aggregate miles where the Prune and Removal audit occurs.

During the Prune and Removal activity, the trees identified during the Detailed Inspection activity as requiring work for the annual cycle are completed. For the Prune and Removal activity audit, SDG&E selects a randomized, representative sample of completed work units (pruned and removed) within each individual Vegetation Management Area (VMA). SDG&E audits approximately 15% of all completed tree pruned and removed units.

To derive the circuit miles audited, SDG&E geospatially links the sampled tree locations to the associated electric assets. This spatial linkage allows SDG&E to calculate the circuit mileage represented by the audited Pruned and Removed units (trees). On average, the circuit mileage resulting from this geospatial association aligns with the circuit-mile sample size targets in OEIS Table 9-6.

In summary, while the Prune and Removal audit sample is selected on a tree-unit basis, the geospatial association of those trees to their overheard infrastructure provides the circuit-mile target, ensuring alignment with both tree-unit and circuit mileage targets.

b.ii. See response to b.i. above.

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END OF REQUEST