

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-02
SDG&E RESPONSE

Date Received: 05-09-2025

Date Submitted: 05-14-2025

Date Amended Response to Question 1 Submitted: 07-21-2025

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.

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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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III. RESPONSES

QUESTION 1

Regarding Vegetation Management Inspections:

On page 209 of its 2026-2028 Base WMP, SDG&E lists the Area Inspected for all Vegetation Management Inspection programs as “HFTD.” On pages 57-60 of its 2026-2028 Base WMP, SDG&E describes evaluating high fire areas outside of the HFTD and explains why SDG&E has not proposed adding these areas to the HFTD. SDG&E states that some of these areas are of a lower priority for grid-hardening initiatives but does not mention other WMP activities.

a. Explain SDG&E’s decision-making process for excluding the WUI and coastal canyons from SDG&E’s 2026-2028 WMP Vegetation Management Inspection Programs and associated targets. Discuss the variables that contributed to this decision (e.g., geography, workforce, resources, effectiveness of other mitigations, etc.).

b. Does SDG&E plan to perform Detailed Inspection (WMP.494) in the WUI and coastal canyons during the 2026-2028 WMP cycle?

i. If not, provide the estimated risk reduction achieved by performing Detailed Inspections to:

1. The WUI
2. Coastal canyons

c. Does SDG&E plan to perform Off-Cycle Patrols (WMP.508) in the WUI and coastal canyons during the 2026-2028 WMP cycle?

i. If not, provide the estimated risk reduction achieved by adding Off-Cycle Patrols to:

1. The WUI
2. Coastal canyons

RESPONSE 1

- a. In response to OEIS Rejection and Order to Submit of SDG&E’s 2026-2028 Base WMP, SDG&E clarifies that Detailed Inspection (WMP.494) activities are performed annually throughout the entire service territory. SDG&E further clarifies that species inspections (Century plant and bamboo) are an additional, associated activity of Detailed Inspections. Species inspections (Century plant and bamboo) are performed throughout the entire service territory. Therefore, holistically, Detailed Inspections and species inspections occur in the HFTD and non-HFTD as well as the WUI and coastal canyons.

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- b. Yes, as described in response to “a.” above, SDG&E plans to perform Detailed Inspection in the WUI and coastal canyons during the 2026-2028 WMP cycle.

b.i. N/A

- c. In response to OEIS Rejection and Order to Submit of SDG&E’s 2026-2028 Base WMP, SDG&E clarifies that Off Cycle Patrols (WMP.508) are performed in the HFTD only. Therefore, the Off Cycle Patrol would occur only in the portions of the WUI and/or coastal canyons where they intersect with the HFTD and where overhead electrical infrastructure is present..

c.i. N/A