

MGRA DATA REQUEST: MGRA-2026-8-05
SDG&E RESPONSE

Date Received: 05-30-2025
Date Submitted: 06-04-2025

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

With regard to SDG&E Data Request Response MGRA-2026-8-03-4 and MGRA-2026-8-04-3:

SDG&E states that it applies its risk aversion function to all attributes related to wildfire, and that the power law correction for wildfire uses an exponent of 1.47.

- a. Under what conditions, if any, will this risk aversion function affect the choice of mitigation set used, and if there are differences how do they come about?
- b. Is cost/benefit ratio used explicitly used as a threshold to make decisions in any wildfire safety process, for spending requests, or in the choice of mitigations? If so state specifically where and how cost/benefit threshold is used. (That comparisons of CBRs is used is clear and need not be discussed.)

RESPONSE 1

- a) Risk aversion is integrated into the assessment of baseline risk, risk reduction potential, residual risk, and cost-benefit evaluations. SDG&E's subject matter experts, including specialists in risk analytics, fire coordination, meteorology, and engineering, utilize these metrics to inform the selection of grid hardening strategies at the feeder-segment level. Final mitigation strategies are determined through detailed, site-specific scoping of each feeder segment.
- b) Cost-benefit ratio (CBR) is not used as a strict threshold or cutoff for decision-making in wildfire safety processes, spending requests, or mitigation selection. Rather, CBR is one of several key metrics used to inform prioritization and comparative evaluation of mitigation options. SDG&E's wildfire mitigation planning process incorporates CBR analyses to assess the relative efficiency of different mitigation strategies, particularly at the feeder-segment level. However, final decisions also consider additional factors such as:
 - Operational feasibility and constructability,
 - Geographic and environmental constraints, and
 - Expert judgment from interdisciplinary teams (including fire science, engineering, and meteorology).

Thus, while CBR comparisons are explicitly used to guide and support decision-making, they are not applied as absolute thresholds that determine whether a mitigation is approved or rejected.

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QUESTION 2

With regard to SDG&E Data Request Response MGR A-2026-8-04-11, CPUC rules ([D.24-05-064](#) at p. 98) state that when a utility uses a convex function to calculate fix, their analysis should be accompanied by a neutral function as well.

a. Has SDG&E prepared a neutral risk analysis and presented in SDG&E_2026-2028_Base WMP_Appendix G Supporting Data_R0.xlsx or elsewhere in public data, and if not please provide one?

RESPONSE 2

SDG&E's neutral risk analysis is presented in the attached file titled "SDGE Response MGR A-2026-8-05_Q2".xlsx.

A revised version of risk aversion cost benefit calculations can be found in SDG&E's substantive and non-substantive errata folder, dated May 16, at the following link:
<https://www.sdge.com/2026-2028-wildfire-mitigation-plan..>

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END OF REQUEST