MGRA DATA REQUEST: MGRA-2026-8-07
SDG&E RESPONSE

Date Received: 07-24-2025
Date Submitted: 07-29-2025

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

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.

MGRA DATA REQUEST: MGRA-2026-8-07
SDG&E RESPONSE

Date Received: 07-24-2025
Date Submitted: 07-29-2025

III. RESPONSES

QUESTION 1

A comparison of SDG&E's Table 8-1 estimated risk reduction in WMP R0 and R1 for its CCC and SUG programs, ostensibly showing per circuit and system wide risk reduction, is as follows:

WMP R0	2026	2027	2028	Total	Risk Reduction per Mile
SUG Miles	0	0	50	50	
CC Miles	50	50	30	130	
SUG Risk Reduction	0	0	93.38%		
CCC Risk Reduction	23.8%	34.4%	43.9%		
WMP R1					
SUG Miles	0	0	50	50	
CC Miles	50	50	30	130	
SUG Risk Reduction	0	0	4.05%	4.05%	.081%
CCC Risk Reduction	0.13%	0.40%	0.27%	0.80%	.0062%

a. Does this table accurately calculated SDG&E's Table 8-1 estimations and results of Appendix G? If not please provide any corrections.

b. In light of OEIS Additional Concern 1.b, how does SDG&E estimate that the amount of risk reduced per mile of SUG is 12X more than the amount of risk reduced by CCC? Please provide supporting technical documentation calculations, and examples.

RESPONSE 1

a. This table is accurately calculated in Appendix G for both WMP R0 and WMP R1. The key difference in the reported risk reductions lies in the scope of the baseline used. In WMP R0, risk reduction was calculated based on the feeder-segments included in the mitigation scope (tab CBR Summary by Risk, column H). In contrast, WMP R1 calculates risk reduction relative to the total service territory baseline risk (tab CBR Summary by Risk, column V), in alignment with the latest guidance from the OEIS.[1]

[1] Letter from Office of Energy Infrastructure Electrical Safety Policy Division Program Manager Nicole Dunlap to Brian D'Agostino, *Rejection and Resubmit Order for the San Diego Gas & Electric Company 2026-2028 Base Wildfire Mitigation Plan*, June 24, 2025. See Non-Conforming Element 3. Available at https://efiling.energysafety.ca.gov/Search.aspx?docket=2026-2028-Base-WMPs

b. Risk reduction is driven by both baseline risk and mitigation effectiveness. SUG is modeled with a 98% mitigation effectiveness, making it generally more cost-effective on the riskiest portions of the system. In contrast, CCC, with a 61.7% effectiveness, is implemented on segments with comparatively lower risk. While the difference in mitigation effectiveness is close to 40%, SUG's application to higher-risk areas results in a greater risk reduction per mile.

MGRA DATA REQUEST: MGRA-2026-8-07
SDG&E RESPONSE

Date Received: 07-24-2025
Date Submitted: 07-29-2025

QUESTION 2

Using neutral risk scaling rather than risk averse scaling, please provide:

a. Table 8-1 entries for SUG and CCC hardening

b. Appendix G with additional tabs showing neutral risk scaling for at least SUG and CCC hardening.

RESPONSE 2

a. Neutral risk scaling only affects the "% Risk Reduction <YEAR>" columns in table 8-1, as such, only these columns have been included. Neutral risk scaling is referred to as "NoAversion":

	% Risk Reduction 2026 (NoAversion)	% Risk Reduction 2027 (NoAversion)	% Risk Reduction 2028 (NoAversion)
Combined Covered Conductor	0.20%	0.37%	0.26%
Strategic Undergrounding	n/a (none scoped)	n/a (none scoped)	2.52%

b. See attached file titled "SDGE Response MGRA-2026-8-07_Q2_Appendix_G_WMP_BCR_NoAversion_2025_07_17_v4_Q2&Q3.xlsx." This is a version of appendix G with NoAversion risk attitude.

MGRA DATA REQUEST: MGRA-2026-8-07
SDG&E RESPONSE

Date Received: 07-24-2025
Date Submitted: 07-29-2025

QUESTION 3

Assuming that SDG&E entries for 2026, 2027, and 2028 assume a certain set of proposed circuits for mitigation using SUG and CCC, swap the 50 miles of circuits planned for CCC mitigation in 2026 (CCC tab 17-20) with the 50 miles of circuits planned for undergrounding in 2028 (SUG tab 17-23). This is to test the sensitivity of the risk reduction result to the circuits being selected. Provide both Appendix G tabs for CCC and SUG and Table 8-1 entries for SUG and CCC:

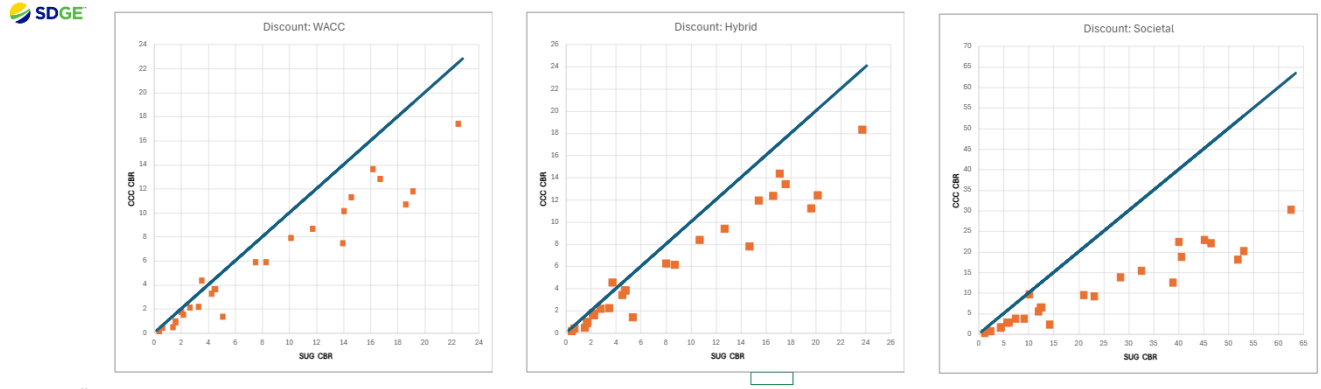
a. Using SDG&E's risk averse scaling function

b. Using risk neutral scaling

RESPONSE 3

These comparisons are available in Appendix G available at https://www.sdge.com/2026-2028-wildfire-mitigation-plan. The raw comparison between the two at the feeder segment level can be found in the tab "SUG_vs_CCC," as well as tabs "SUG_comp" and "CCC_comp." Visual representations of the compared CBRs can be found in the "SUG_vs_CCC_plot" tab. There is one plot for each discount rate. Each orange square represents a feeder segment. The x axis measures the SUG CBR for the feeder segment, and the y axis measures the CCC CBR. The blue line denotes the point at which the SUG & CCC CBRs are equal. Points below the line indicate a higher SUG CBR and points above the line indicate a higher CCC CBR. These same resources can be found in the attached version of Appendix G that uses "NoAversion" risk attitude – as denoted in question 2. The plots can also be found below:

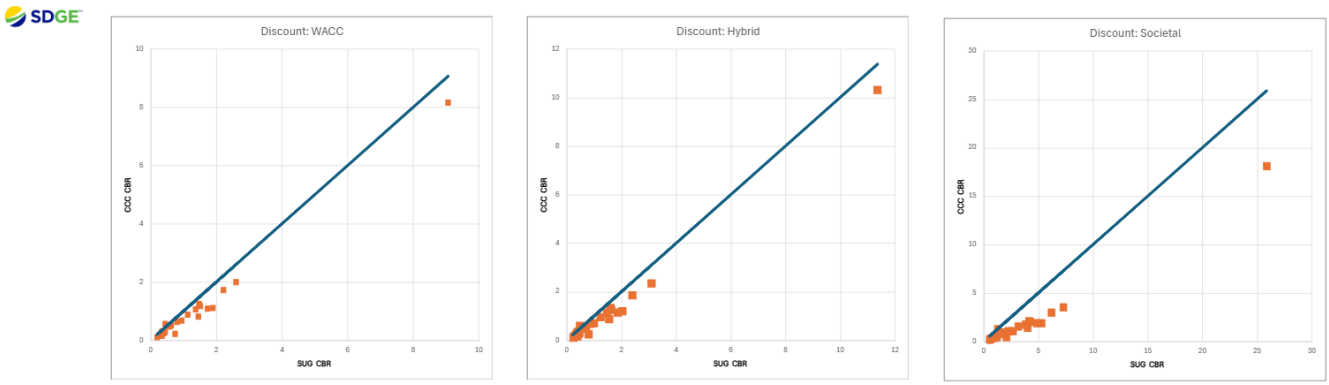
Aversion:



MGRA DATA REQUEST: MGRA-2026-8-07
SDG&E RESPONSE

Date Received: 07-24-2025
Date Submitted: 07-29-2025

NoAversion:



Note:

Each orange dot represents a Feeder-Segment CBR. Dots below the 1:1 ratio (blue line) indicate that the SUG CB
greater than the CCC CBR. Conversely, orange dots above the blue line indicate that the CCC CBR is greater thai
SUG CBR.

MGRA DATA REQUEST: MGRA-2026-8-07
SDG&E RESPONSE

Date Received: 07-24-2025
Date Submitted: 07-29-2025

END OF REQUEST