

MGRA DATA REQUEST: MGRA-2026-8-08

SDG&E RESPONSE

Date Received: 07-25-2025

Date Submitted: 07-30-2025

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

Please provide an Excel spreadsheet showing the circuit segments that were hardened as part of the SDG&E undergrounding program in the 2023-2025 period, including those planned but not completed in 2025, showing:

- a. Circuit feeder segment
- b. Number of miles mitigated
- c. Year(s) that mitigation was performed
- d. Quintile tranche ID assignment of circuit segment.
- e. HTM tranche ID assignment of circuit segment (if available)

RESPONSE 1

SDG&E objects to the request to the extent it requires SDG&E to perform additional analyses and/or studies that do not currently exist, and is thus overly broad and unduly burdensome. SDG&E further objects to the request to the extent the request lacks relevance with respect to SDG&E's pending 2026-2028 WMP and is not reasonably calculated to lead the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See attached spreadsheet titled:

"SDGE Response MGR A-2026-8-08_Q1and2_nb_output_TU_2025_07_30.xlsx" containing the circuit segments that were undergrounded as part of SDG&E's Strategic Undergrounding program between January 1, 2023 and March 31, 2025.

With respect to requests 1d and 1e, SDG&E is unable to provide tranche information (Quintile Tranche ID or HTM Tranche ID) for feeder segments in the 2023–2025 period. Tranche IDs are calculated based on baseline risk at the start of a planning period (i.e., 2023), and such calculations were not required for these segments at that time. However, as noted in Appendix G of SDG&E's 2026-2028 WMP submission, each feeder segment is associated with a Tranche ID based on the updated 2025 baseline risk.

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QUESTION 2

Please provide an Excel spreadsheet showing the circuit segments that were hardened as part of the SDG&E covered conductor program in the 2023-2025 period, including those planned but not completed in 2025, showing:

- a. Circuit feeder segment
- b. Number of miles mitigated
- c. Year(s) that mitigation was performed
- d. Quintile tranche ID assignment of circuit segment.
- e. HTM tranche ID assignment of circuit segment (if available)

RESPONSE 2

SDG&E objects to the request to the extent it requires SDG&E to perform additional analyses and/or studies that do not currently exist, and is thus overly broad and unduly burdensome. SDG&E further objects to the request to the extent the request lacks relevance with respect to SDG&E's pending 2026-2028 WMP and is not reasonably calculated to lead the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

See attached spreadsheet titled "SDGE Response MGRA-2026-8-08_Q1and2_nb_output_TU_2025_07_30.xlsx" containing the circuit segments that were hardened as part of SDG&E's Covered Conductor program between January 1, 2023 and March 31, 2025.

With respect to requests 2d and 2e, SDG&E is unable to provide tranche information (Quintile Tranche ID or HTM Tranche ID) for feeder segments in the 2023–2025 period. Tranche IDs are calculated based on baseline risk at the start of a planning period (i.e., 2023), and such calculations were not required for these segments at that time. However, as noted in Appendix G of SDG&E's 2026-2028 WMP, each feeder segment is associated with a Tranche ID based on the updated 2025 baseline risk.

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END OF REQUEST