

**OEIS DATA REQUEST: OEIS-P-WMP\_2025-SDGE-08**  
**SDG&E RESPONSE**

**Date Received: 06-02-2025**  
**Date Submitted: 06-04-2025**

a. **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

**OEIS DATA REQUEST: OEIS-P-WMP\_2025-SDGE-08**  
**SDG&E RESPONSE**

**Date Received: 06-02-2025**  
**Date Submitted: 06-04-2025**

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.

**OEIS DATA REQUEST: OEIS-P-WMP\_2025-SDGE-08  
SDG&E RESPONSE**

**Date Received: 06-02-2025  
Date Submitted: 06-04-2025**

**III. RESPONSES**

**QUESTION 1**

Regarding Weather Station Outage Procedures

SDG&E states on page 252 of its 2026-2028 Base WMP that the weather stations, "...have consistently maintained a 99 percent communication rate."

a. Provide the procedures utilized for the emergency repair and maintenance of the 217 weather stations owned and operated by SDG&E. Include the following:

i. Average time from repair ticket initiation to completed repair and device back "in service."

ii. Procedure for maintenance/repair for other than communication rate issues.

iii. Procedure for maintenance/repair for communication rate issues.

iv. Acceptable percentage of stations "out of service" for other than communication rate issues that allow SDG&E to develop the daily/hourly weather forecasts and FPI values for the service area.

**RESPONSE 1**

a.

i. SDG&E does not have a formalized emergency repair procedure for its 217 weather stations; however, emergency maintenance is addressed through regular coordination with its contracted repair and calibration crews based out of the Kearny Maintenance & Operations District. Weather station issues are prioritized during weekly communications, and in the event of an emergency, the Kearny manager is contacted directly to initiate repair efforts. Additional meetings may be convened as needed to expedite resolution. Repair timelines are dependent on crew availability and the specific nature of the issue. As such, SDG&E does not maintain a standardized average repair time. Based on recent experience, emergency repairs have been completed within approximately one week from issue identification to the station being returned to service.

ii. Maintenance and repairs follow a required maintenance schedule managed by Kearny Maintenance & Operations personnel. See attached document titled: OEIS-P\_2025-08\_Q1\_532.075 Weather Station Inspection, Testing, Maintenance.

**OEIS DATA REQUEST: OEIS-P-WMP\_2025-SDGE-08**  
**SDG&E RESPONSE**

**Date Received: 06-02-2025**

**Date Submitted: 06-04-2025**

iii. When communication rate issues arise, the first step is to contact the weather station and data vendor, Western Weather Group (WWG), for remote troubleshooting. If additional support is needed, Kearny Maintenance & Operations personnel are contacted. WWG and Kearny work collaboratively to diagnose and resolve communication rate problems. If the issue cannot be resolved remotely, WWG will coordinate with a field technician to perform on-site maintenance or repairs.

iv. SDG&E Meteorology does not use weather station observations to make weather forecasts or to produce the FPI. Model output is used for those tasks.

**QUESTION 2**

Regarding SDG&E's Right Tree, Right Place Mitigation Activity

On page 285 of its 2023-2025 Base WMP, SDG&E sets a "target goal" to distribute 10,000 trees each year as a part of its Right Tree, Right Place (RTRP) mitigation activity. RTRP may encourage customers to replace powerline incompatible tree species with powerline compatible tree species. SDG&E did not include its RTRP mitigation activity in its 2026-2028 Base WMP, but did indicate in OEIS-P-WMP\_2025\_SDGE-002, question 02, that it "will continue to engage customers on the option to remove incompatible trees using the concept of Right Tree, Right Place during the inspection and tree pruning and removal activities during the 2026-2028 Base WMP."

a. Discuss how SDG&E will continue to promote incompatible tree replacement during the 2026-2028 Base WMP cycle. In doing so, address: i. How SDG&E encourages customer participation in its RTRP program (e.g., through pamphlets, information booths, vegetation management workers actively offering tree replacement, etc.).

ii. How SDG&E considers which tree species to offer RTRP program participants and aims to replace non-native trees with native trees (e.g., through consultation with nurseries, arborists, master gardeners, etc.).

iii. How SDG&E ensures its RTRP program retains its scope from year-to-year.

**RESPONSE 2**

a.

i. SDG&E encourages customer participation in the RTRP program in multiple ways, beginning with the Pre-Inspection activity. When an inspector identifies a tree that is incompatible with the power lines based on species, growth rate or other characteristics, they will contact the customer to discuss the benefits of tree removal and replacement. This discussion usually involves safety, compliance and reliability benefits of compatible trees near power lines. SDG&E also engages customers and the community on the RTRP

**OEIS DATA REQUEST: OEIS-P-WMP\_2025-SDGE-08**  
**SDG&E RESPONSE**

**Date Received: 06-02-2025**

**Date Submitted: 06-04-2025**

concept and program during tree planting events, wildfire safety fairs, and other outreach venues and collateral. Additionally, SDG&E's Vegetation Management website provides information, links, and appropriate suggested species for planting near powerlines.

- ii. SDG&E considers compatible trees for the RTRP program those whose mature canopy height does not require pruning for power line safety. RTRP is a mature concept and program within the utility vegetation management industry including multiple resources for identifying proper species selection. Additional components of the program include the utilization of native species where applicable and appropriate. The application of the program within SDG&E is made by Certified Arborists whose education and background provide the necessary knowledge to apply RTRP.
- iii. The scope of the RTRP fluctuates year to year and is based directly on the number of incompatible trees that are removed. This program is also an element of SDG&E's sustainability initiative which includes targeted goals over multiple years.

**QUESTION 3**

Regarding Past Due Vegetation Management Work Orders

On page 232 of its 2026-2028 Base WMP Substantive and Non-substantive Errata, SDG&E includes an updated version of OEIS Table 9-8. The errata version of OEIS Table 9-8 switches low priority and high priority row values relative to the version of OEIS Table 9-8 that SDG&E included in its response to OEIS-P-WMP\_2025-SDGE-002, question 06. Thus, it is not clear which table is accurate.

- a. Provide the correct version of OEIS Table 9-8: Number of Past Due Vegetation Management Work Orders Categorized by Age and Priority Levels.

**RESPONSE 3**

OEIS Table 9-8 is accurate as presented in the response to OEIS-P-WMP\_2025-SDGE-002, submitted on 14 May 2025, and as provided in the 2026-2028 Substantive and Non-substantive Errata, submitted on 16 May 2025.

OEIS Table 9-8: Number of Past Due Vegetation Management Work Orders Categorized by Age and Priority Levels.

Priority Level	0-30 days	31-90 days	91-180 days	181+ days
High Priority	40	12	2	0
Low Priority	335	242	4	1

**OEIS DATA REQUEST: OEIS-P-WMP\_2025-SDGE-08**  
**SDG&E RESPONSE**

**Date Received: 06-02-2025**  
**Date Submitted: 06-04-2025**

**OEIS DATA REQUEST: OEIS-P-WMP\_2025-SDGE-08**  
**SDG&E RESPONSE**

**Date Received: 06-02-2025**  
**Date Submitted: 06-04-2025**

**QUESTION 4**

Regarding Top Risk Circuits

a. On page 60 of SDG&E's 2026-2028 Base WMP, SDG&E states that OEIS Table 5-5 "also includes segments that contribute to more than 1 percent of the Overall Utility risk". Provide a list of these circuit segments, including the overall utility risk score and risk-per-mile score associated with those circuit segments.

b. On page 116 of SDG&E's 2026-2028 Base WMP, SDG&E presents OEIS Table 6-4 showing the top-risk circuits. Describe how these top risk circuits were determined (i.e., top percentage, overall risk, or risk per mile).

i. If not already the case, provide an updated version of OEIS Table 6-4 sorted using the same risk-per-mile methodology as OEIS Table 5-5, with the following additional columns:

- 1) Undergrounding planned for 2026 (circuit mileage)
- 2) Undergrounding planned for 2027 (circuit mileage)
- 3) Undergrounding planned for 2028 (circuit mileage)
- 4) Covered conductor planned for 2026 (circuit mileage)
- 5) Covered conductor planned for 2027 (circuit mileage)
- 6) Covered conductor planned for 2028 (circuit mileage)

**RESPONSE 4**

a) See table below showing circuit-segments that exceed top 1% of the total risk across all circuit-segments

<b>upstreamardfacility id</b>	<b>overall_utility_risk_per_mile</b>
222-1986R	\$ 3,725,802
222-1990R	\$ 3,168,165
358-682F	\$ 3,006,265
909-451	\$ 2,682,718
909-805R	\$ 2,408,131
1458-601R	\$ 2,400,175
908-2038R	\$ 2,301,533
1021-1748F	\$ 1,983,191

**OEIS DATA REQUEST: OEIS-P-WMP\_2025-SDGE-08  
SDG&E RESPONSE**

**Date Received: 06-02-2025  
Date Submitted: 06-04-2025**

<b>upstreamardfacility id</b>	<b>overall_utility_risk_per_mile</b>
237-30R	\$ 1,957,370
237-2R	\$ 1,847,268
524-69R	\$ 1,181,539

b) Refer to the following excel file with updated OEIS Table 6-4 sorted using the same risk-per-mile methodology as OEIS Table 5-5. This list is unfiltered and includes all segments in the territory.

SDGE Response OEIS-P-WMP\_2025-SDGE-08\_Q4.xlsx

**QUESTION 5**

Regarding Cost Benefit Ratio (CBR)

In response to Energy Safety Data Request OEIS-P-WMP\_2025-SDGE-07 Question 3, Energy Safety requested that SDG&E provide the CBR and risk reduction for both undergrounding and covered conductor for each project as used for decision-making, as specified by including columns (vi)-(ix). However, SDG&E only provided the CBR and risk reduction of the chosen hardening methodology for each project.

- a. Provide an updated response via Excel that includes two additional columns for each project provided for the CBR and risk reduction so that each project has values for both covered conductor and undergrounding.

**RESPONSE 5**

The response is updated in the attached file “SDGE Response OEIS-P-WMP\_2025-SDGE-08\_Q5.xlsx.”

**END OF REQUEST**



**OEIS DATA REQUEST: OEIS-P-WMP\_2025-SDGE-08**  
**SDG&E RESPONSE**

**Date Received: 06-02-2025**  
**Date Submitted: 06-04-2025**