

**OEIS DATA REQUEST: OEIS-P-WMP\_2025-SDGE-10**  
**SDG&E RESPONSE**

**Date Received: 06-24-2025**  
**Date Submitted: 07-03-2025**

**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**

Regarding Idle Transmission Power Lines:

- a. How many circuit miles of idle transmission lines does SDG&E currently have located within the HFTD and HFRA?
- b. Do any of these idle, deenergized transmission lines run parallel to and in close proximity (within 1,000 feet) with energized transmission lines?
  - i. If so, provide the number of circuit miles, and describe the spacing characteristics and location of each instance.
- c. Provide a preliminary estimate of idle transmission line miles planned for removal between 2026 and 2028.
- d. Provide SDG&E's latest findings or studies on whether idle transmission lines present a potential induction risk that could result in unintended energization.
- e. Describe any procedures, policies, or future planned projects to mitigate the ignition risk of idle transmission lines that SDG&E is considering.

**RESPONSE 1**

SDG&E objects to the request to the extent it seeks information that is protected by the attorney-client privilege and/or constitutes attorney work product. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

- a. SDG&E currently maintains 14.69 circuit miles of idle transmission lines within Tier 2 and Tier 3 HFTD.
- b. Yes. SDG&E maintains 3 idle transmission lines within HFTD that share structures with or parallel (within 1,000 feet) existing energized transmission lines.
  - b.i. - TL99925 shares structures with (1) transmission line and parallels (4) existing energized transmission lines across its entirety of 0.32 circuit miles. TL99925 parallel separation distances range from being on a shared structure to 280 feet apart.

	Distance Between (feet)	Parallel Length (Circuit Miles)
Same Structure – 230kV	Same Structure	0.32
Parallel 1 - 138kV	100	0.32

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Parallel 2 - 138kV	100	0.32
Parallel 3 - 69kV	180	0.32
Parallel 4 - 230kV	280	0.32

- TL99901 parallels (4) existing energized transmission lines. TL99901 totals 7.63 idle circuit miles. A breakdown of distances and parallel lengths is included below:

	Distance Between (feet)	Parallel Length (Circuit Miles)
Parallel 1 - 69kV	77	0.24
Parallel 2 - 69kV	60	5.54
Parallel 3 - 69kV	280	0.55
Parallel 4 - 230kV	60	5.53

- TL99904 parallels (4) existing energized transmission lines and also briefly parallels various non-SDGE lines. TL99904 totals 6.74 idle circuit miles. A breakdown of distances and parallel lengths is included below:

	Distance Between (feet)	Parallel Length (Circuit Miles)
Parallel 1 - 69kV	278	0.76
Parallel 2 - 230kV	55	0.03
Parallel 3 - 230kV	175	3.90
Parallel 4 - 230kV	175	3.91
Various Non - SDGE	130	3.27

c. SDG&E does not have any proposed plans to remove existing idle transmission lines within the HFTD. Portions of these lines are currently identified in future projects to be reused for new energized transmission lines. Approximately 4.7 miles of the existing idle TL99901 and 2.6 miles of the existing idle TL99904 are being evaluated for reuse or replacement as new energized transmission lines.

d. See attached documents titled “OutOfServiceSummary.pdf” and “OOServiceCircuitSummary-AppendixA.pdf.”

e. SDGE maintains a limited number of transmission lines that are currently out of service. The idle transmission lines are isolated and not grounded. These lines undergo regular inspections and are maintained in accordance with all applicable standards and requirements, as if they were energized.

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**END OF REQUEST**