

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-11
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 Pole Clearing in the Local Responsibility Area (LRA):

On page 281 of its 2023-2025 Base WMP, SDG&E stated “In addition to the approximately 34,000 poles SDG&E clears every year for compliance and fire prevention, approximately 2,475 poles are cleared in the Local Responsibility Area (LRA). This includes poles located in areas of dense and/or highly flammable vegetation and/or located near steep topography.” On page 213 of its 2026–2028 Base WMP, SDG&E explains its decision to stop clearing poles with exempt equipment during the 2026–2028 WMP cycle, but it does not clarify why it decided to stop clearing poles in the LRA.

- a. Explain SDG&E’s decision-making process for no longer clearing poles in the LRA including locations with dense and/or highly flammable vegetation and/or located near steep topography.
- b. Provide details of any risk reduction measures that will compensate for the reduced volume of pole clearing work.

RESPONSE 1

- a. SDG&E breaks its service territory into discrete, geographical Vegetation Management Areas (VMA) for the purpose of performing all its vegetation management activities, including pole clearing. The VMA boundaries may be determined by several factors including but not limited to SDG&E Operational District boundaries, city boundaries, and geographical features. In most instances the VMAs are not delineated by the dividing line between the State Responsibility Area (SRA) and Local Responsibility Area (LRA). Therefore, the SRA/LRA boundary often intersects VMA boundaries resulting in VMAs that are entirely within SRA, LRA, or a blend of the two.

Historically, in VMAs that contain SRA and LRA, SDG&E has also brushed the poles located within the LRA portion of the VMA to be consistent in the scope and application of PRC 4292. SDG&E will continue this approach moving forward. However, where SDG&E plans to halt pole clearing activities are in those VMAs that exist fully within the LRA. The approximate 2,475 poles described in the 2026-2028 WMP cycle are those that are located in VMAs that are entirely within the LRA. SDG&E’s decision to adjust its work practice and halt pole clearing activities in VMAs located entirely within the LRA was to ensure an appropriate balance between risk-mitigation and affordability for SDG&E ratepayers, consistent with the spirit of SDG&E’s applicable General Rate Case.

Based on SDG&E’s ongoing wildfire mitigation work throughout the HFTD, SDG&E concluded that pole clearing within the entire LRA has limited additional risk mitigation value, given that SDG&E already has a robust pole clearing and fuels management program within the HFTD and the SRA. Additional factors contributing to the decision for

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no longer clearing poles within the LRA were the potential for negative environmental impacts caused by pole clearing, and to reduce impacts to customers.

- b. As stated in response to (a) above, SDG&E will continue to perform pole clearing within those VMAs whose boundary includes both LRA and SRA. For those VMAs that are entirely within the LRA, Vegetation Management will continue its annual pre-inspection activity which includes a visual foot patrol of each span to assess the relationship between trees and the overhead conductors. The electronic records that represent the LRA poles will remain visible to the inspectors who can report ground vegetation conditions that may warrant follow-on action. Additionally, through routine maintenance operations, where applicable, SDG&E replaces old pole hardware with Cal Fire-approved equipment. Such action removes the threat of ignition and negates the need to perform vegetation clearing at the base of the pole.

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QUESTION 2

Regarding Public Resource Code section 4292 Non-Exempt and Exempt Pole Clearing:

On page 272 of its 2023-2025 Base WMP, SDG&E stated that “Pole clearing (brushing) (WMP.512) is performed on approximately 34,000 poles located in the [State Responsibility Area (SRA)] of the service territory subject to PRC § 4292.”

a. Complete the table below regarding SDG&E’s pole clearing work in the SRA during its 2023-2025 Base WMP cycle:

State Responsibility Area (SRA) PRC 4292 Exempt/Non-Exempt Pole Statistics

	2023	2024
Total Number of Poles with PRC 4292 Exempt and Non-Exempt Equipment		
Number of Poles with PRC 4292 Exempt Equipment		
Number of Brushed Poles with PRC 4292 Exempt Equipment		
Number of Poles with PRC 4292 Non-Exempt Equipment		
Number of Brushed Poles with PRC 4292 Non-Exempt Equipment		

b. Complete the table below regarding SDG&E’s pole clearing work in the LRA during its 2023-2025 Base WMP cycle:

Local Responsibility Area (LRA) PRC 4292 Exempt/Non-Exempt Pole Statistics

	2023	2024
Total Number of Poles with PRC 4292 Exempt and Non-Exempt Equipment		
Number of Poles with PRC 4292 Exempt Equipment		
Number of Brushed Poles with PRC 4292 Exempt Equipment		
Number of Poles with PRC 4292 Non-Exempt Equipment		
Number of Brushed Poles with PRC 4292 Non-Exempt Equipment		

c. Complete the table below regarding SDG&E’s pole clearing work in the FRA during its 2023-2025 Base WMP cycle:

Federal Responsibility Area (FRA) PRC 4292 Exempt/Non-Exempt Pole Statistics

	2023	2024
Total Number of Poles with PRC 4292 Exempt and Non-Exempt Equipment		
Number of Poles with PRC 4292 Exempt Equipment		
Number of Brushed Poles with PRC 4292 Exempt Equipment		
Number of Poles with PRC 4292 Non-Exempt Equipment		
Number of Brushed Poles with PRC 4292 Non-Exempt Equipment		

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RESPONSE 2

a.

State Responsibility Area (SRA) PRC 4292 Exempt/Non-Exempt Pole Statistics

	2023	2024
Total Number of Poles with PRC 4292 Exempt and Non-Exempt Equipment	35,507	34,826
Number of Poles with PRC 4292 Exempt Equipment	10,162	10,162
Number of Brushed Poles with PRC 4292 Exempt Equipment	8,293	8,361
Number of Poles with PRC 4292 Non-Exempt Equipment	25,345	24,664
Number of Brushed Poles with PRC 4292 Non-Exempt Equipment	21,933	21,856

b.

Local Responsibility Area (LRA) PRC 4292 Exempt/Non-Exempt Pole Statistics

	2023	2024
Total Number of Poles with PRC 4292 Exempt and Non-Exempt Equipment	2,645	3,440
Number of Poles with PRC 4292 Exempt Equipment	1,266	1,266
Number of Brushed Poles with PRC 4292 Exempt Equipment	409	584
Number of Poles with PRC 4292 Non-Exempt Equipment	1,379	2,174
Number of Brushed Poles with PRC 4292 Non-Exempt Equipment	882	1,078

c.

Federal Responsibility Area (FRA) PRC 4292 Exempt/Non-Exempt Pole Statistics

	2023	2024
Total Number of Poles with PRC 4292 Exempt and Non-Exempt Equipment	1,957	1,847
Number of Poles with PRC 4292 Exempt Equipment	328	328
Number of Brushed Poles with PRC 4292 Exempt Equipment	255	261
Number of Poles with PRC 4292 Non-Exempt Equipment	1,629	1,519
Number of Brushed Poles with PRC 4292 Non-Exempt Equipment	1,386	1,500

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END OF REQUEST