

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-12
SDG&E RESPONSE

Date Received: 07-16-2025
Date Submitted: 07-18-2025

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 Public Resource Code Section 4292 Non-Exempt and Exempt Pole Clearing:

a. Complete the table below regarding SDG&E's pole clearing work in State Responsibility Areas (SRAs) located within the HFTD from 2022 to 2024:

SRA within the HFTD PRC 4292 Exempt/Non-Exempt Pole Statistics

	2022	2023	2024
Total Number of Poles with PRC 4292 Exempt and Non-Exempt Equipment			
Number of Poles with PRC 4292 Exempt Equipment			
Number of Cleared Poles with PRC 4292 Exempt Equipment			
Number of Poles with PRC 4292 Non-Exempt Equipment			
Number of Cleared Poles with PRC 4292 Non-Exempt Equipment			

b. Complete the table below regarding SDG&E's pole clearing work in Local Responsibility Areas (LRAs) located within the HFTD from 2022 to 2024:

LRA within the HFTD PRC 4292 Exempt/Non-Exempt Pole Statistics

	2022	2023	2024
Total Number of Poles with PRC 4292 Exempt and Non-Exempt Equipment			
Number of Poles with PRC 4292 Exempt Equipment			
Number of Cleared Poles with PRC 4292 Exempt Equipment			
Number of Poles with PRC 4292 Non-Exempt Equipment			
Number of Cleared Poles with PRC 4292 Non-Exempt Equipment			

c. Complete the table below regarding SDG&E's pole clearing work in Federal Responsibility Areas (FRAs) located within the HFTD from 2022 to 2024:

FRA within the HFTD PRC 4292 Exempt/Non-Exempt Pole Statistics

	2022	2023	2024
Total Number of Poles with PRC 4292 Exempt and Non-Exempt Equipment			
Number of Poles with PRC 4292 Exempt Equipment			
Number of Cleared Poles with PRC 4292 Exempt Equipment			
Number of Poles with PRC 4292 Non-Exempt Equipment			
Number of Cleared Poles with PRC 4292 Non-Exempt Equipment			

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RESPONSE 1

SDG&E is providing to the best of its ability the geographical location of its pole assets where clearing activities have occurred based on geospatial data and activity history. SDG&E notes that, for this data request, OEIS uses the term, “Cleared Poles”, while in a similar request for “OEIS-P-WMP_2025SDGE-11”, OEIS uses the term, “Brushed Poles”. For clarity, SDG&E notes that these terms are interchangeable and identify the same activity.

a.

SRA within the HFTD PRC 4292 Exempt/Non-Exempt Pole Statistics

	2022	2023	2024
Total Number of Poles with PRC 4292 Exempt and Non-Exempt Equipment	32,561	32,568	32,097
Number of Poles with PRC 4292 Exempt Equipment	8,960	8,960	8,960
Number of Cleared Poles with PRC 4292 Exempt Equipment	7,475	7,561	7,621
Number of Poles with PRC 4292 Non-Exempt Equipment	23,601	23,608	23,137
Number of Cleared Poles with PRC 4292 Non-Exempt Equipment	20,917	20,867	20,781

b.

LRA within the HFTD PRC 4292 Exempt/Non-Exempt Pole Statistics

	2022	2023	2024
Total Number of Poles with PRC 4292 Exempt and Non-Exempt Equipment	1,523	1,364	1,601
Number of Poles with PRC 4292 Exempt Equipment	624	624	624
Number of Cleared Poles with PRC 4292 Exempt Equipment	527	195	287
Number of Poles with PRC 4292 Non-Exempt Equipment	899	740	977
Number of Cleared Poles with PRC 4292 Non-Exempt Equipment	750	396	501

c.

FRA within the HFTD PRC 4292 Exempt/Non-Exempt Pole Statistics

	2022	2023	2024
Total Number of Poles with PRC 4292 Exempt and Non-Exempt Equipment	1,847	1,918	1,806
Number of Poles with PRC 4292 Exempt Equipment	321	321	321
Number of Cleared Poles with PRC 4292 Exempt Equipment	259	252	259
Number of Poles with PRC 4292 Non-Exempt Equipment	1,526	1,597	1,485
Number of Cleared Poles with PRC 4292 Non-Exempt Equipment	1,517	1372	1,485

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END OF REQUEST