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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

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 SDG&E's Pole Clearing Target WMP.512:

SDG&E's annual pole clearing target (WMP.512) in Revision 1 of its 2026–2028 Base WMP has decreased by 11,010 poles compared to its 2023–2025 Base WMP. However, Table 9-2 of the 2026–2028 Base WMP Revision 1 shows an increased estimated risk reduction benefit from this activity, increasing from 2.84%, as shown in the "x% Risk Impact" column of Table 8-14 in SDG&E's 2023–2025 Base WMP, to 4.59% in the "% Risk Reduction" column of Table 9-2 in SDG&E's 2026–2028 Base WMP Revision 1.

a. Explain why the estimated risk reduction benefit from SDG&E's pole clearing target (WMP.512) has increased in the 2026–2028 WMP cycle, despite the overall volume of work decreasing by 11,010 poles.

RESPONSE 1

The difference of 11,010 poles in total targets between the 2023–2025 Base WMP and the 2026–2028 Base WMP is due to the exclusion of poles that are exempt from the vegetation clearance requirements of Public Resources Code 4292. The exemption is based on the presence of attached hardware defined as exempt by Cal Fire. Therefore, these poles are deemed to pose minimal fire risk.

Additionally, note that the 2023–2025 Base WMP risk reductions are calculated using the Multi-Attribute Value Function (MAVF)[1], while the 2026–2028 Base WMP Revision 1 risk reductions are based on a cost-benefit approach.[2] These calculations are performed at different levels of granularity: the 2023–2025 WMP reductions are assessed at the Tier 2, Tier 3, and Non-HFTD levels, whereas the 2026–2028 WMP reductions are evaluated at the feeder-segment level. This shift in methodology and granularity resulted in a higher estimated risk reduction per unit of mitigation, with the effectiveness of pole clearing increasing by approximately 2.5 times in the 2026–2028 Base WMP Revision 1 compared to the earlier plan.

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[1] https://www.sdge.com/sites/default/files/regulatory/SCG_SDGE_RAMP-C_Risk_Quantification_Framework_and_Risk_Spend_Efficiency_5-17-21.pdf
[2] https://www.sdge.com/sites/default/files/regulatory/Vol1_Ch3_Joint_ERM_Risk_Quantification.pdf

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QUESTION 2

Regarding Enhanced Clearances Joint Effectiveness Study:

The Joint Study analyzed the effect of enhanced clearance distances using outages as a proxy for wildfire ignitions. This approach was used because the number of ignitions in the database is too small to draw robust conclusions.

a. How many ignition datapoints are needed to conduct an analysis of the effect of enhanced clearances on the probability of ignition? i. Explain how this number was calculated.

b. What data attributes are needed to perform this analysis?

c. Does SDG&E already collect these attributes? i. If not, what attributes does SDG&E need to begin collecting?
        ii. If not, is SDG&E planning to collect these attributes?
                (1) If yes, when will SDG&E start collecting these attributes?
                (2) If not, why not?

RESPONSE 2

a. SDG&E disagrees with the interpretation, "This approach was used because the number of ignitions in the database is too small to draw robust conclusions." This data request does not include the citation from the White Paper or the third party's assessment. As stated in the White Paper of the enhanced clearance study, the research results demonstrate that greater clearance reduces the probability of outages by a measurable amount. The study evaluates the impact of clearance on causing vegetation-bare conductor contacts and treats every vegetation-bare conductor contact as a heat event. The heat generated by such contact is one of the three factors that contribute to the probability of fire, as shown in the fire triangle figure.
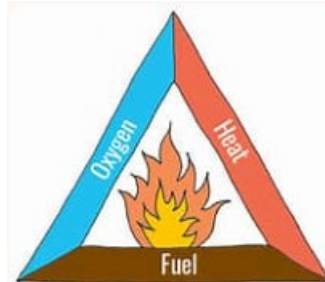
Because the purpose of the study is to evaluate the effectiveness of tree trimming clearance, measuring and modeling probability of vegetation contact is the correct method, whereas probability of ignition is not. Modeling probability of vegetation contact is equivalent to modeling probability of heat events caused by vegetation contact. When holding the other two factors (Oxygen and Fuel) consistent, a reduction in probability of heat event is a reduction in probability

of fire or ignition. Such modeling in the study is the crucial part of modeling probability of fire or ignition caused by vegetation contact. Again, clearance is not the direct cause of fire.

Therefore, the vegetation-caused ignition data points are not the data inputs needed for evaluating the effectiveness of tree trimming clearance.

b. If the goal is to model the probability of fire or ignition caused by vegetation-bare conductor contact, the other two components required are the probability of fire due to the fuels condition (P_{fire}), and probability of oxygen. Since it can be assumed that the probability of oxygen is 100% (=1), based on probability theorem, the probability of ignition given vegetation-bare conductor contact ($P_{fire \mid veg\ contact}$) is explained as follows:

$P_{(fire \mid veg\ contact)}$: Probability of fire given vegetation contact
$P_{(veg\ contact \mid fire)}$: Probability of vegetation contact given fire
$P_{(fire)}$: Prior probability of fire due to fuels condition, regardless of the cause of the heat
$P_{(veg\ contact)}$: Probability of vegetation contact

$$P(\text{fire} \mid \text{veg contact}) = \frac{P(\text{veg contact} \mid \text{fire}) \cdot P(\text{fire})}{P(\text{veg contact})}$$

The CPUC reportable ignition data are sufficient to calculate $P_{(veg\ contact \mid fire)}$. The additional component left to evaluate is the probability of fire due to the fuels condition.
This again confirms that the probability of ignition is not the right model for evaluating effectiveness of tree trimming since fuels conditions can change the probability of fire regardless of tree trimming. They are independent events.

c.ii

1. SDG&E does not directly track or model fuels data internally. Instead, SDG&E partners with Technosylva, which provides annual updates to fuels maps and integrates fuel conditions into its fire behavior simulations. These maps incorporate surface and canopy fuel characteristics and are refreshed to reflect seasonal changes, disturbances, and regrowth. Technosylva uses this fuel layer, alongside weather, topography, and asset data to estimate site-specific fire spread conditions, which supports SDG&E's operational and planning decision

2. SDG&E is not planning to collect data attributes because SDG&E receives fuels data from Technosylva.

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END OF REQUEST