

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-14
SDG&E RESPONSE

Date Received: 08-12-2025
Date Submitted: 08-15-2025

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 Lines:

In Data Request OEIS-P-WMP_2025-SDGE-10, Question 1, Energy Safety requested information on SDG&E's idle transmission lines.

- a. Provide the definition of "idle transmission lines" SDG&E used to respond to this request.
- b. Explain what criteria differentiates "deenergized transmission lines," "idle transmission lines," and "abandoned transmission lines."

RESPONSE 1

- A. In response to Data Request OEIS-P-WMP_2025-SDGE-10, Question 1, SDG&E defined "idle transmission lines" as deenergized transmission lines currently not in service but that are retained for future use.
- B. The definitions are as follows:
 - **Deenergized transmission lines** are lines that are currently in service that have been electrically disconnected from the Grid for a short period of time.
 - **Idle transmission lines** are deenergized transmission lines that are not currently in service but that are retained for future use.
 - **Abandoned transmission lines** are deenergized transmission lines that have been permanently removed from service and are not retained for future use.

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QUESTION 2

Regarding Design Scenarios:

In SDG&E's response to Data Request OEIS-P-WMP_2025-SDGE-06, Question 5, and on page 51 of SDG&E's 2026-2028 Base WMP R1, SDG&E described using a 2-year historical period for weather and fuel data, and a set of 125 extreme fire weather days spanning 2013-2022.

- a. What two years are used for the historical period (i.e., 20XX-20XX)?
- b. Why was the period of 2013 - 2022 used to determine extreme fire weather days, and not a longer period of time?

RESPONSE 2

- A. The 2-year historical period for weather and fuel data were 2020 and 2024.
- B. The decision to use the 2013-2022 period for identifying extreme fire weather days was based on several key factors:
 - 2013 marks the first year SDG&E implemented a Public Safety Power Shutoff (PSPS), providing a reliable operational record of severe fire weather conditions.
 - The 2023 calendar year was reviewed by SDG&E's Meteorology and Risk Analytics subject matter experts, who determined that none of the days met the criteria for inclusion in the simulation.
 - The process for identifying and validating extreme fire weather days is conducted annually, with final selections typically completed by the end of Q1 and shared with Technosylva for consequence modeling. Technosylva's outputs are generally returned by the end of Q3, making it infeasible to incorporate 2024 data into the current WMP Base 2026-2028 and RAMP 2025 planning cycle.

Note that SDG&E has completed its annual review and is actively working with Technosylva to incorporate fire weather conditions observed in December 2024 and January 2025 within its service territory. These updates will inform future iterations of the WiNGS-Planning model and support ongoing refinement of SDG&E's grid hardening strategy for wildfire risk mitigation.

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END OF REQUEST