

OEIS DATA REQUEST: OEIS-P-WMP_2025-SDGE-15
SDG&E RESPONSE

Date Received: 08-15-2025
Date Submitted: 08-20-2025

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 Work Orders Resulting from Asset Inspections:

a. Provide the number of work orders created during asset inspections in 2022, 2023, and 2024.

RESPONSE 1

Year	Number of Distribution Work Orders	Number of Transmission Work Orders
2022	7553	737
2023	4096	677
2024	1499	768

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QUESTION 2

Regarding OEIS Table 5-5 in Appendix F:

a. Provide a revised OEIS Table 5-5 that includes the additional four columns listed below. Include SDG&E's current hardened status for each circuit. Additionally, the revised table should include all circuits, both distribution and transmission, within the HFTD Tier 2 and Tier 3, even if they were previously omitted from OEIS Table 5-5. Submit the revised table in Excel format.

Underground Miles	Miles of Covered Conductor	Miles of Combined Covered Conductor	Miles of Traditional Overhead Hardening (Within the last 20 years)

RESPONSE 2

Please see attached file named "SDGE Response OEIS-P-WMP_2025-SDGE-15_Q2_table_5_5_alt_run_08_19_2025.csv" for revised OEIS Table 5-5 adjusted as requested, and note the following:

- Risk assessed circuit-segments in WiNGS-Planning represent the distribution lines and do not include transmission lines.
- All covered conductor miles are presented as Combined Covered Conductor.
- The 'Total Miles' field as populated in OEIS Table 5-5 represents total overhead HFTD mileage and does not include underground mileage associated with the segment.

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QUESTION 3

Regarding Table 4-1 High-Level Service Territory Components:

- a. Provide the following service territory components broken down by HFTD Tier 2 or Tier 3, and Non-HFTD

Characteristic	HFTD Tier 2	HFTD Tier 3	Non-HFTD	Total
Hardened overhead transmission lines (circuit miles)				
Hardened overhead distribution lines (circuit miles)				
Substations (#)				
Power generation facilities (#)				
Distribution transformers (#)				
Reclosers (#)				
Poles (#)				
Microgrids (#)				

RESPONSE 3

Characteristic	HFTD Tier 2	HFTD Tier 3	Non-HFTD	Total
Hardened overhead transmission lines (circuit miles)	592	268	313	1,173
Hardened overhead distribution lines (circuit miles)	645	860	228	1,733
Substations (#)	32	12	111	155
Power generation facilities (#)	7	1	29	37
Distribution transformers (#)	36,751	16,050	119,868	172,669
Reclosers (#)	147	154	190	491
Poles (#)	38,631	33,092	108,932	180,655
Microgrids (#)	1	1	2	4

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QUESTION 4

Regarding OEIS Table:

- a. Provide an updated version of OEIS Table 6-4 (SDG&E 2026-2028 Base WMP R1, pp. 134-135) via Excel with the following additional columns:
- i. 2026 undergrounding planned miles
 - ii. 2027 undergrounding planned miles
 - iii. 2028 undergrounding planned miles
 - iv. 2026 covered conductor planned miles
 - v. 2027 covered conductor planned miles
 - vi. 2028 covered conductor planned miles
 - vii. WiNGS 3.0 Overall Risk Score
 - viii. Risk Ranking based on WiNGS 3.0 Overall Risk Score

RESPONSE 4

Please see attached file titled “SDGE Response OEIS-P-WMP_2025-SDGE-15_Q4.xlsx.” that includes the additional columns listed above. The WiNGS 3.0 risk and rank are based on a 2023 baseline risk snapshot.

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QUESTION 5

Regarding Evidence of Heat Events:

In SDGE Table 6-10 (SDG&E 2026-2028 Base WMP R1, p. 120), and Figure 6-5 (SDG&E 2026-2028 Base WMP R1, p. 113), SDG&E provided data on evidence of heat events used to evaluate mitigation effectiveness.

- a. How does SDG&E define an “evidence of heat” event?
- b. What threshold/criteria does SDG&E use to determine whether something counts as an “evidence of heat” event? (a) Provide any supporting procedures used during field evaluations to determine if an identified condition counts as an “evidence of heat” event.
- c. Provide a list of all risk drivers that count as an “evidence of heat” event.
- d. Provide an updated version of SDGE Table 6-10 that breaks out the number of “evidence of heat” events for each ignition-related driver.
- e. Provide a breakout of the number of “evidence of heat” events per equipment type for all “Equipment – Non-conductor” events.
- f. Provide a breakout of the number of “evidence of heat” events for all sub-drivers under “Other All” events.

RESPONSE 5

- a. Evidence of Heat refers to observed signs of arching, charring, or ignition, such as a char mark on a cross arm, that may not always meet the definition of CPUC reportable ignitions but may indicate a potential ignition risk.
- b. The criteria for an Evidence of Heat event is any event observed that involves an electric asset where arching, charring or an ignition occurred regardless of outage status.
(a) Troubleshooters dispatched to an electric event provide data indicating an Evidence of Heat event in a report page within the Service Order Routing Technology (SORT) order that must be completed during the order completion documentation process.
- c. Every record collected through SDG&E’s Ignition Management Program (IMP) is classified using subject matter expertise from Fire Coordination, Risk Analytics, and Reliability Engineering teams. This collaborative approach ensures that each event is categorized based on its characteristics and potential driver. The following is a list of all risk drivers that count as an “evidence of heat” event:

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- Animal
- Balloon
- Conductor
- Non-Conductor
- OH to UG
- Other All
- Other Contact
- Undetermined
- Vegetation
- Vehicle contact

d. In response to the recent data request, SDG&E has provided an updated version of Table 6-10, which breaks out the number of “evidence of heat” events by ignition-related driver.

Please note the following classification details:

- Some instances of observed evidence of heat attributed to circuit breaker activity have been categorized under the “Other (Equipment)” driver to align with ignition drivers.
- Similarly, events caused by external forces impacting the SDG&E system and fires initiated by non-SDG&E equipment have been categorized under the “Other (Other – All)” driver for the same reason.
- This classification approach ensures consistency with the ignition data framework while capturing the nuances of each event.

SDG&E Table 6-10

Overhead Distribution Ignition-Related Drivers	2024/2025 Subject Matter Expert Ignition-Related Reduction (%)	Total Number of CPUC Reportable Ignitions and Evidence of Heat Events [2019 - 2024]	Estimated Number of Ignition-Related Events Reduced
Animal	90%	20	18
Balloon	90%	27	24.3
Vegetation	90%	72	64.8
Vehicle	80%	20	16
Other (Contact)	50%	47	23.5
Conductor	90%	123	110.7
Connector	39%	1	0.39
Fuse	39%	52	20.28
Recloser	39%	17	6.63
Switch	39%	12	4.68
Transformer	39%	308	120.12

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Overhead Distribution Ignition-Related Drivers	2024/2025 Subject Matter Expert Ignition-Related Reduction (%)	Total Number of CPUC Reportable Ignitions and Evidence of Heat Events [2019 - 2024]	Estimated Number of Ignition-Related Events Reduced
Other (Equipment)	39%	22	8.58
OH to UG	75%	20	15
Contamination	10%	6	0.6
Vandalism	10%	16	1.6
Lightning	10%	10	1
Other (Other All)	10%	119	11.9
Undetermined	70%	10	7
Total		902	455.08

- e. SDG&E has not conducted its initial analysis for Non-conductor driver using the detailed sub-drivers. However, in response to this data request, SDG&E has identified the following sub-drivers for each record in the Evidence of Heat dataset

Sub Driver	Evidence of Heat
Connector	1
Fuse	52
Recloser	17
Switch	12
Transformer	308
Circuit Breaker	18
Other Equipment	4

- f. SDG&E has not conducted its initial analysis for “Other All” driver using the detailed sub-drivers. However, in response to this data request, SDG&E has identified the following sub-drivers for each instance of evidence of heat.

Sub Driver	Evidence of Heat
Contamination	6
External Force Impacted SDG&E System	28
Lightning	10
Other	5
Vandalism	12
Fire Cause by Non SDGE Equipment	90

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QUESTION 6

Regarding Utility Repair Costs:

In the Response to Data Request OEIS-P-WMP_2025-SDGE-02, Question 7, SDG&E noted that utility repair costs are neglected as relatively insignificant for wildfire financial consequence.

- a. Provide the percentage of costs that are due to utility repair costs within the overall wildfire financial consequence.
- b. Clarify if utility repair costs are factored into PSPS/PEDS financial consequence, and if they are, provide a detailed description of how they are factored in.

RESPONSE 6

- a. SDG&E's wildfire consequence model does not estimate utility repair costs, because of the difficulty of estimating the number of assets impacted and the severity of the impact and because the high-level dollar estimates for utility repairs would be relatively insignificant when compared to the more substantial costs associated with structural losses and acres burned.

Technosylva simulations, whether based on daily forecasted weather scenarios or worst-case fire day conditions derived from a reduced sample set within SDG&E's service territory, do not inherently provide estimates of SDG&E assets impacted or destroyed within the fire perimeter. However, asset-level impact assessments can be performed manually through the Wildfire Analyst (WFA) user interface. Based on the last three PSPS de-energization events where manual fire simulations were conducted using post-patrol damage locations as potential ignition points, SDG&E determined that asset-level impact estimates can be derived using conservative assumptions. Specifically, assuming a repair and replacement cost of \$1 million per mile, reflecting replacement with covered conductor, and a destruction ratio calculated from the number of structures destroyed versus those impacted, the resulting weighted average increase in estimated impact is approximately 2.1%.

Given the relatively minor increase in estimated wildfire consequences (approximately 2.1%) derived from manual simulations and the current limitations in Technosylva's ability to provide asset-level impact data, SDG&E opted not to incorporate these estimates into its wildfire consequence model at this time. SDG&E may continue to evaluate the availability and applicability of such data. Future updates to the consequence model may include these estimates if further analysis supports their integration.

- b. Utility repair costs are not currently factored into the financial consequence estimates for PSPS or PEDS.

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END OF REQUEST