

**OEIS DATA REQUEST: OEIS-P-WMP\_2025-SDGE-17**  
**SDG&E RESPONSE**

**Date Received: 08-27-2025**  
**Date Submitted: 08-29-2025**

**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 SDG&E's Wood and Slash Management Procedures:

On page 241 of its 2026-2028 Base WMP R1, SDG&E directed readers to Section 9.3.2 for procedures related to wood and slash management. In Section 9.3.2, SDG&E listed two procedures "Program Overview Guide; Version November 1, 2024," and "Tree Pruning and Removal Activity; Version November 1, 2024." Upon review of these documents, Energy Safety did not find any language specifically addressing the management of wood and slash resulting from SDG&E's vegetation management activities.

- a. Provide SDG&E's procedure document(s) for managing wood and slash resulting from its vegetation management activities as described in its 2026–2028 Base WMP.
  - i. If no such procedures exist:
    1. Explain why SDG&E does not have procedure document(s) for these activities.
    2. Provide any plans SDG&E has to create procedure document(s) for these activities.
- b. Describe how SDG&E mitigates health and safety risks associated with leaving wood and slash on customer properties, including:
  - i. Maintaining defensible space, in accordance with state and local laws or ordinances such as PRC Section 4291 and Government Code Section 51182.
  - ii. Blocking, hindering, or potentially blocking (e.g., wood/debris rolling or blowing into) ingress or egress (roads, driveways, walkways, etc.).
- c. Provide procedure document(s) that describe how SDG&E mitigates the health and safety impacts identified in item (b).
  - i. If no such procedures exist:
    1. Explain why SDG&E does not have procedure document(s) for these activities.
    2. Provide any plans SDG&E has to create procedure document(s) for these activities.

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**RESPONSE 1**

a. SDG&E currently does not have a formal procedural document containing language specifically addressing the management of wood and slash resulting from SDG&E's vegetation management activities. SDG&E's service agreement with its tree contractors does provide criteria for proper disposal of large wood left on site associated with tree removal operations to address any health and safety risks, to the extent they exist. See screenshot below of the excerpted language in the agreement.

A tree is considered removed if the trunk has been cut down to ground level and the remaining stump has been effectively treated to eliminate future re-growth. Any wood left on site shall be cut into manageable size pieces unless requested otherwise in writing. "Manageable" pieces are not to exceed fifty (50) pounds in weight or four (4) feet in length. Contractor will warrant all Removed Trees against re-growth for a period of two (2) years from the date of removal and/or treatment.

a.i.1. SDG&E relies on its professionally trained workforce of utility line clearance arborists to follow applicable OSHA-related requirements and American National Standards Institute (ANSI) Z133 standards and best management practices as they relate to safety practices and job-site cleanup. SDG&E also engages its SDG&E Area Foresters who are Certified Arborists to provide operational oversight of trimming and removal activities by attending job briefings and worksites, and Field Safety Observers who perform jobsite safety reviews, to check for adherence to operational procedures including wood and debris management.

a.i.2. SDG&E plans to develop a formalized and specific procedure document that addresses wood and slash management procedures for inclusion in its next WMP.

b.i. SDG&E does not currently provide specific guidance procedures specifically for maintaining defensible space in accordance with state and local laws or ordinances such as PRC Section 4291 and Government Code Section 51182. SDG&E notes that it has no influence and cannot control customers' compliance with any applicable requirements, ordinances, or local laws pertaining to defensible space on private property.

b.ii. Please see response to a. above. SDG&E contractors are instructed to leave wood in a safe and manageable condition and, where applicable, to orient wood perpendicular to steep slopes to prevent material from moving.

c. Please see response to a. above.

c.i.1. Please see response to a.i.1, and b.ii. above.

c.i.2. Please see response to a.i.2. above.

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**END OF REQUEST**