SPD DATA REQUEST: SPD-SDGE-WMP2026-001
SDG&E RESPONSE

Date Received: 05-28-2025
Date Submitted: 06-06-2025

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

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

Relevant to all questions below and in an effort to offer clarity on costs and any related cost analyses, SDG&E clarifies that costs incurred in any given year do not directly correlate to the number of miles energized in the same year. The installation of covered conductor and deployment of strategic undergrounding is complex work that requires many months, sometimes spanning multiple years, for project initiation through construction and energization. Costs in question in this data request include pre-construction costs planned to be incurred in years prior to the miles being energized, construction costs planned to be incurred primarily in the year of energization, and post-construction costs that may be incurred in the year following energization. The timing for when these costs are incurred relative to time of energization is dependent on project schedules. Specifically for 2026 – 2028 energizations of covered conductor and undergrounding, costs can likely be incurred between 2024 – 2029. Key expenses that influence the cost forecasts include pre-construction activities (project management, scheduling, engineering and design, GIS, surveying, permitting, public relations, etc.) and construction activities (labor, equipment, and materials). These costs can be incurred in multiple years during the life of a project depending on when the project is initiated and the project schedule.

For these reasons, SDG&E asserts that it is inappropriate to derive unit costs by dividing annual/cyclical total costs by number of miles planned for energization. This method fails to consider the fact that pre- and post-construction costs may be included in any given year for previous work completed and planned work to be completed.

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QUESTION 1

Provide SPD with the confidential versions of SDG&E's 2026-2028 Wildfire Mitigation Plan (WMP) and any confidential associated documents or attachments submitted to the Office of Energy Infrastructure and Safety (Energy Safety).

a. Provide SPD with any confidential responses to data requests that SDG&E sent to Energy Safety or any other party since May 2, 2025. Include any attachments, appendices or datasets in the native format that were sent to Energy Safety or any other party with the confidential data requests. Submit all of the materials to Kiteworks packaged in a single zip file and organized according to the following folder structure:

i. Party Name (i.e. Energy Safety, Cal Advocates, MGRA, TURN etc.)

ii. DR Name (i.e. SPD-SDGE-WMP2026-001)
    1. Place the original data request in this folder
    2. Place the confidential data request responses in this folder.

iii. Attachments
    1. Place any confidential attachments to the data request responses in this folder.

RESPONSE 1

SDG&E does not have a confidential version of its 2026-2028 WMP and has not provided any confidential responses to data requests received thus far.

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QUESTION 2

SDG&E submitted an Errata workpaper titled TN15872_20250516T165458_SDGE_20262028_BaseWMP_Appendix_G_Supporting_Data_Errata.xlsx on May 16 2025.

a. Provide SPD with a description of each of the fields found in the following spreadsheets of this workpaper:

i. raw_WiNGS_Planning

ii. TrancheID

iii. FeederSegment miles

iv. SUG&CCC_Lifecycle_cost

v. Capital_Units&Cost

vi. O&M_Units&Cost

b. For each of the fields described in SDG&E's response to Question 2a., SDG&E must explain how each field is calculated.

i. If the data comes from an external dataset, provide SPD with that dataset. For instance, in the SUG&CCC_Lifecycle_cost spreadsheet, the field avg_yearly_if_ug_cost_per_mile records values that appear to have been calculated from another dataset. Provide SPD with that dataset.

RESPONSE 2

a.

i-iv. Please see the attached file titled "*SPD-SDGE-WMP2026-001-Q02.Metadata.xlsx"* for complete information on column outputs for information pertaining to raw_WiNGS_Planning, TrancheID, FeederSegment miles, and SUG&CCC_Lifecycle_cost. Additionally, see attached *WiNGS Planning Consequence Simulation Data Dictionary.docx* for a complete data dictionary on all WiNGS-Planning related simulation outputs.

v-vi. Capital_Units&Cost and O&M_Units&Cost
The capital unit cost represents the capital expense required to perform work each year. It is a combination of Actuals and forecasted cost. Although these costs are documented, the

data in these sheets is not directly used within the work paper formulas. Its inclusion is intended to align the calculations used for SDG&E's 2025 RAMP filing and 2026-2028 WMP cost-benefit ratios; however, it was not used for WMP cost-benefit ratio calculations, and is therefore irrelevant.

b.

Please see the attached file titled "*SPD-SDGE-WMP2026-001-Q02.Metadata.xlsx"* for information pertaining to the calculation of column data.

i. The dataset used to generate Columns A-Q in SUG&CCC_Lifecycle_cost has been provided in the attached file titled "SDGE Response SPD-SDGE-WMP2026-001-Q02.b.Lifecycle Cost Dataset.xlsx".

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QUESTION 3

During the 2026-2028 Base Wildfire Mitigation Plan Workshop hosted by Energy Safety on May 21, 2025, SDG&E presented a series of slides (slides 81-114 of the Workshop Slides). Provide SPD with all of the SDG&E slides in its native ppt format.

a. All figures and textboxes should remain editable

b. Any workbooks that were embedded in the ppt should remain embedded in the ppt.

RESPONSE 3

See attached slide deck titled "SDGE WMP 2026-2028_Presentation.pptx."

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Date Received: 05-28-2025
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QUESTION 4

During the 2026-2028 Base Wildfire Mitigation Plan Workshop hosted by Energy Safety on May 21 2025, SDG&E presented the unit cost of covered conductor as approximately $1.44 million ($1M for Installation and $.44M for Foundational) on slide 96 of the Workshop Slides. In SDG&E's 2026- 2028 Base WMP Table 6-1 presents Combined Covered Conductor (WMP.455) as having an Expected Implementation Cost of $212,401,000. Table 8-1 presents the 3-year total for Combined Covered Conductor (WMP.455) miles as 130. This amounts to a unit cost of $1,633,853.

a. Provide all workpapers that support how SDG&E arrived at the Expected Implementation Cost of Combined Covered Conductor of $212,401,000.

i. If an incorrect value was input into Table 6-1, provide the correct value and explain why the value was incorrectly recorded in Table 6-1.

b. Confirm that the 3-year total for Combined Covered Conductor (WMP.455) presented in Table 8-1 is 130 miles.

i. If it is not, provide the correct value and explain why the value was incorrectly recorded in Table 8-1.

c. Provide all workpapers that support how SDG&E arrived at the unit cost for covered conductor as presented in the May 21 2025 2026-2028 Base Wildfire Mitigation Plan Workshop on slide 96.

i. The workpaper(s) must explain how each of the five components (Installation, Inspections+, Vegetation Management, PSPS and Foundational) were calculated.

ii. Explain if the Installation costs included estimates for replacing cross arms and poles.

iii. Provide a detailed description of the PSPS costs.

iv. Provide a detailed description of the Inspections+ costs.

v. How might the PSPS and Inspections+ costs overlap? If they do not overlap, explain why.

vi. Do any of the five categories include the cost for replacement of the asset after its55 year use life is complete?

1.If yes, explain how that was calculated.

2.If not, explain why not.

3.If not, provide an estimate of the replacement cost/mile of covered conductor

vii. Do any of the five categories include the cost for decommissioning or disposing(i.e.net negative salvage) of the asset after its 55 year use life is complete?

1.If yes, explain how that was calculated.

2.If not, explain why not.

3.If not, provide an estimate of the decommissioning cost/mile of covered conductor

viii. Explain the discrepancy between the unit cost of $1,633,853 in the WMP and what was presented at the Workshop.

d. In SDGE's Response to Question 15 of the data request SPD-SDGE-SB884-07, SDG&E provided the SDGE Response SPD-SDGE-SB884-07_Q15_CC.xlsx workbook. The total cost per mile presented in this workbook presents SDG&E's unit cost for covered conductor as $1,551,882.

i. Explain the discrepancy between the unit cost of $1,633,853 in the WMP and what was presented in the SDGE Response SPD-SDGE-SB884-07_Q15_CC.xlsxworkbook.

ii. Explain the discrepancy between the unit cost of approximately $1.44M presented in the May 21 2025 2026-2028 Base Wildfire Mitigation Plan Workshop on slide 96 and what was presented in the SDGE Response SPD-SDGE-SB884-07_Q15_CC.xlsxworkbook.

iii. Explain why in the SDGE Response SPD-SDGE-SB884-07_Q15_CC.xlsx workbook three Project IDs 0157-A-C1C,0157-P-CC, and0157-S-CC along with all of their associated data are duplicated.

iv. If there is an update to the SDGE ResponseSPD-SDGE-SB884-07_Q15_CC.xlsx workbook that was used in the WMP, provide SPD with a copy of that workbook.

v. If there is an update to the SDGE Response SPD-SDGE-SB884-07_Q15_CC.xlsx workbook that was used to prepare slide 96 2026-2028 Base Wildfire Mitigation Plan Workshop slide deck, provide SPD with a copy of that workbook.

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RESPONSE 4

a. In responding to this data request, SDG&E found that the cost estimates presented in Table 6-1 were erroneously derived from its 2025 RAMP workpapers, encompassing both Capital and O&M expenses. SDG&E will correct Table 6-1 in its WMP at the next available opportunity provided by Energy Safety guidelines. Expected Implementation Cost of Covered Conductor for the 3-year WMP cycle $183.10 million. The workpaper supporting this cost forecast is provided in the attached spreadsheet titled "SDGE Response SPD-SDGE-WMP2026-001-Q04a_Q05a.xlsx"

b. Yes, the 3-year target for Combined Covered Conductor (WMP.455) presented in Table 8-1 is 130 miles.

c. [Regarding unit costs presented at Workshop → Lifecycle costs]

i. The dataset used to generate the average cost per mile used in the workshop is included in the attached file titled "SDGE Response SPD-SDGE-WMP2026-001-Q04.c.Lifecycle Cost Dataset hftd only.xlsx".

ii. The estimated installation cost of $1M/mile includes estimates for replacing all associated equipment, including, but not limited to, cross arms and poles, as needed and determined in design.

iii. **Lifecycle PSPS Cost** = **PSPS Activation Cost + PSPS Comm. Cust Outreach Cost**
PSPS Activation Cost = (baseline cost/mile + activation cost/mile × simulated frequency) × Overhead HFTD miles × 55 years
PSPS Comm. Cust Outreach Cost = baseline cost/mile × Overhead HFTD miles × 55 years

iv. **[Overhead] Inspections +** = **Asset Inspection Costs + Asset Repair/Replacement Costs**
Overhead Asset Inspection Costs = (Detailed Inspection Cost per pole + Patrol Inspection Cost per pole + Wood Pole Intrusive Cost per pole + Drone Inspection Cost per pole) × ∫ frequency per year [1] × 55 years

Overhead Asset Repair/Replacement Cost **= (**Replacement Capital cost + Repair Capital + Repair and Replacement O&M) × frequency × 55 years

Veg Management Lifecycle Cost = **tree related costs + pole related costs + fuel management**

[1] It represents the function used in python code to apply the math equation for activity-specific frequency rate. The frequency rate per activity is defined as a variable.

Tree related costs = (inspections + trim/removal + audit) × ∫ frequency per year × 55 years

Pole related costs = (inspections + clearing + audit) × ∫ frequency per year × 55 years

Fuel management costs = cost per year × 55 years

When assets are undergrounded, the cost for community outreach and emergency management costs are estimated to be reduced, 50% reduction is used in the current lifecycle model.

v. There is no overlap between Inspections + and PSPS costs because the activities included in each are unique activities.

vi. [Cost of replacement after 55 yrs. for five categories]
1. The current version 2.0 of the lifecycle model assumes that the life of the covered conductor and undergrounding asset is 55 years, therefore the replacement cost of these installations is not included in the 55-year lifecycle analysis. However, the replacement cost of existing equipment as a result of asset inspection corrective action is included. The purpose of the lifecycle model is to compare the cost difference in the next 55 years between covered conductor and underground mitigation alternatives.
2. N/A.
3. SDG&E has not replaced any covered conductor and therefore has no cost estimation at this time. However, replacing bare conductor with covered conductor is estimated at $1M/mile.

vii. [Decommissioning costs for five categories]
1. The current version 2.0 of the lifecycle model assumes that the life of the covered conductor and underground asset is 55 years, therefore decommissioning cost is not included in the 55-year lifecycle analysis. The purpose of the lifecycle model is to compare the cost difference in the next 55 years between covered conductor and undergrounding mitigation alternatives.
2. N/A
3. The purpose of the lifecycle model is to compare the cost difference between covered conductor and underground mitigation options. Decommission related cost would be part of the project that grants the action of decommissioning after 55 years should better energy solution become available.

viii. As explained in part a. above, the total 3-year cost to implement covered conductor in the 2026-2028 WMP cycle is $183.10 million. Furthermore, and as discussed prior, the total costs for the 3-year cycle also include costs for work potentially

completed in years ahead of the cycle and years following the cycle. Therefore, it is inappropriate to derive unit costs using annual/cyclical costs and only the miles energized in that year/cycle.

Additionally, the unit costs presented during the workshop of $1.44M in direct costs comprise $1M/mile for installation and $0.44M/mile for foundational elements, whereas the total cost to implement in the 3-year cycle is for installation only. These two costs are not comparable in that one includes lifecycle foundational costs and the other does not.

d. Relevant to all responses below, SDG&E clarifies that the *direct* unit cost for covered conductor provided in response SPD-SDGE-SB884-07_Q15_CC.xlsx workbook is $1,037,000.

   i. As discussed in part a. above, the correct Table 6-1 Expected Implementation Cost of covered conductor for the 3-year cycle is $183.10 million. Again, it is inappropriate to derive a unit cost based on total cyclical costs.

   ii. The unit costs presented during the workshop of $1.44M/mile in direct costs comprise $1M/mile for installation and $0.44M/mile for foundational elements, whereas the cost of $1.037 million presented in SPD-SDGE-SB884-07_Q15_CC.xlsx is for installation only. These two costs are not comparable in that one includes lifecycle foundational costs and the other does not. However, SDG&E points out that the installation cost of $1M/mile in both the workshop slides and SPD-SDGE-SB884-07_Q15_CC.xlsx is comparable.

   iii. The three Project IDs – 0157-A-CC, 0157-P-CC, and 0157-S-CC along with their associated data, were inadvertently duplicated in the originally provided SPD-SDGE-SB884-07_Q15_CC.xlsx workbook. The duplicates have been removed, and the file was reuploaded with no further changes to SDG&E's 884 website at https://www.sdge.com/rates-and-regulations/proceedings/SB-884-Expedited-Undergrounding-Program-Discovery-Data-Requests.

   iv. SDGE did not use SPD-SDGE-SB884-07_Q15_CC.xlsx workbook for the WMP.

   v. SDGE did not use SPD-SDGE-SB884-07_Q15_CC.xlsx workbook for the 2026-2028 Base Wildfire Mitigation Plan Workshop slide deck.

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QUESTION 5

During the 2026-2028 Base Wildfire Mitigation Plan Workshop hosted by Energy Safety on May 21 2025, SDG&E presented slides describing the unit cost of undergrounding as approximately $2.18 million. In SDG&E's 2026-2028 Base WMP Table 6-1 presents Strategic Undergrounding (WMP.473) as having an Expected Implementation Cost of $435,575,000. Table 8-1 presents the 3-year total for Strategic Undergrounding (WMP.473) miles as 50. This amounts to a unit cost of $8,711,500.

a. Provide all workpapers that support how SDG&E arrived at the Expected Implementation Cost of Strategic Undergrounding of $435,575,000.

i. If an incorrect value was input into Table 6-1, provide the correct value and explain why the value was incorrectly recorded in Table 6-1.

b. Confirm that the 3-year total for Strategic Undergrounding (WMP.473) is 130 miles.

i. If it is not, provide the correct value and explain why the value was incorrectly recorded in Table 8-1.

c. Provide all workpapers that support how SDG&E arrived at the unit cost for strategic undergrounding as presented in the May 21 2025 2026-2028 Base Wildfire Mitigation Plan Workshop on slide 96.

i. The workpaper(s) must explain how each of the four components (Installation, Inspections+, PSPS and Foundational) were calculated.

ii. Provide a detailed description of the PSPS costs.

iii. Provide a detailed description of the Inspections+ costs.

iv. How might the PSPS and Inspections+ costs overlap? If they do not overlap, explain why.

v. Do any of the five categories include the cost for replacement of the asset after its 55 year use life is complete?

1.If yes, explain how that was calculated.

2.If not, explain why not.

3.If not, provide an estimate of the replacement cost/mile of covered conductor

vi. Do any of the five categories include the cost for decommissioning or disposing (i.e. net negative salvage) of the asset after its 55 year use life is complete?

1.If yes, explain how that was calculated.

2.If not, explain why not.

3.If not, provide an estimate of the decommissioning cost/mile of covered conductor

vii. Explain the discrepancy between the unit cost of $8,711,500 in the WMP and what was presented at the Workshop.

d. In SDGE's Response to Question 15 of the data request SPD-SDGE-SB884-07, SDG&E provided the SDGE Response SPD-SDGE-SB884-07_Q15_UG.xlsx workbook. The total cost per energized mile and total cost per trench mile presented in this workbook presents SDG&E's unit cost for strategic undergrounding as $2,300,569 and $2,834,747 respectively.

i. Explain the distinction between energized mile and trench mile as presented in the SDGE Response SPD-SDGE-SB884-07_Q15_UG.xlsx workbook.

ii. Does the unit cost of $8,711,500 included in the WMP represent a cost per energized mile or a cost per trench mile? Explain.

iii. Does the unit cost of approximately $2.18M that was included in the May 21 2025 2026-2028 Base Wildfire Mitigation Plan Workshop on slide 96 represent a cost per energized mile or a cost per trench mile? Explain.

iv. Explain the discrepancy between the unit cost of $8,711,500 in the WMP and what was presented in the SDGE Response SPD-SDGE-SB884-07_Q15_UG.xlsx.

v. Explain the discrepancy between the unit cost of approximately $2.18M presented in the May 21 2025 2026-2028 Base Wildfire Mitigation Plan Workshop on slide 96 and what was presented in the SDGE Response SPD-SDGE-SB884-07_Q15_UG.xlsx.

vi. If there is an update to the SDGE Response SPD-SDGE-SB884-07_Q15_UG.xlsx workbook that was used in the WMP, provide SPD with a copy of that workbook.

vii. If there is an update to the SDGE Response SPD-SDGE-SB884-07_Q15_UG.xlsx workbook that was used to prepare slide 96 2026-2028 Base Wildfire Mitigation Plan Workshop slidedeck, provide SPD with a copy of that workbook.

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RESPONSE 5

a. In responding to this data request, SDG&E found that the cost estimates presented in Table 6-1 were erroneously derived from its 2025 RAMP workpapers, encompassing both Capital and O&M expenses. SDG&E will correct Table 6-1 in its WMP at the next available opportunity provided by Energy Safety guidelines. Expected Implementation Cost of Strategic Undergrounding (SUG) for the 3-year WMP cycle is $150.824 million. The workpaper supporting this cost forecast is provided in the attached spreadsheet titled "SDGE Response SPD-SDGE-WMP2026-001-Q04a_Q05a.xlsx."

b. The 3-year SUG target is 50 miles and is correctly presented in WMP Table 8-1.

c. [Regarding workshop slides cost of $2.18M/mile, installation + foundational] SDG&E clarifies that the lifecycle unit cost of SUG presented in the workshop slides to which this question pertains is $2.59M/mile, which includes installation costs, inspections and maintenance costs, PSPS costs, and foundational costs over 55 years.
   i. The dataset used to generate the average cost per mile used in the workshop has been provided in the attached file titled "SDGE Response SPD-SDGE-WMP2026-001-Q04.c.Lifecycle Cost Dataset hftd only.xlsx".
   ii. **Lifecycle PSPS Cost = PSPS Activation Cost + PSPS Comm. Cust Outreach Cost**
   PSPS Activation Cost = (baseline cost/mile + activation cost/mile × simulated frequency) × Overhead HFTD miles × 55 years
   PSPS Comm. Cust Outreach Cost = baseline cost/mile × Overhead HFTD miles × 55 years
   iii. **Underground Asset Lifecycle Cost = Underground Asset Inspection Costs + Underground Repair and Replacement Costs**
   Underground Asset Inspection Costs = (SS10 Inspection (Subsurface) + AGI/E Inspection (Padmount)) × ∫ frequency per year × 55 years
   Underground Repair and Replacement Costs = (Replacement Capital + Repair Capital + Repair and Replacement O&M) × ∫ frequency per year × 55 years
   iv. There is no overlap between Inspections + and PSPS costs because the activities included in each are unique activities.
   v. [Cost of replacement after 55 yrs. for five categories]
      1. The current version 2.0 of the lifecycle model assumes that the life of the covered conductor and undergrounding asset is 55 years, therefore the replacement cost of these installations is not included in the 55-year lifecycle analysis. However, the replacement cost of existing equipment as a result of asset inspections corrective action is included. The purpose of the lifecycle model is to compare the cost difference in the next 55 years between covered conductor and underground mitigation alternatives.
      2. N/A.
      3. SDG&E has not replaced any newly installed, WMP-related undergrounded cable and therefore has no cost estimation at this time.

vi. [Decommissioning costs for five categories]
   1. The current version 2.0 of the lifecycle model assumes that the life of the covered conductor and underground asset is 55 years, therefore decommissioning cost is not included in the 55-year lifecycle analysis. However, the repair/replace/decommission cost of existing equipment as a result of asset inspections corrective action is included. The purpose of the lifecycle model is to compare the cost difference in the next 55 years between covered conductor and undergrounding mitigation alternatives.
   2. N/A
   3. The purpose of the lifecycle model is to compare the cost difference between covered conductor and underground mitigation alternatives. SDG&E does not have an estimate for decommissioning costs for undergrounded cable.

vii. As explained in part a. above, the total 3-year cost to implement undergrounding in the 2026-2028 WMP cycle is $150.824 million. Furthermore, and as discussed prior, the total costs for the 3-year cycle also include costs for work potentially completed in years ahead of the cycle and years following the cycle. Therefore, it is inappropriate to derive unit costs using annual/cyclical costs and only the miles energized in that year/cycle.

Additionally, the unit costs presented during the workshop of $2.18 million in direct costs comprise $2 million/mile for installation and $0.18 million/mile for foundational elements, whereas the total cost to implement in the 3-year cycle is for installation only. These two costs are not comparable in that one includes lifecycle foundational costs and the other does not.

d. SDG&E clarifies that the *direct* unit cost for undergrounding provided in Response SPD-SDGE-SB884-07_Q15_UG.xlsx workbook is $1.930 million for energized miles and $2.379 million for trench miles.
   i. Trench mile is a unit of measure which includes civil construction (digging the trench & sub-structure locations, placement of conduit, etc.) required to complete a project(s), whereas Energized Mile is a unit of measure that includes the use of existing underground facilities (spare conduit) that were cabled as part of the project(s).
   ii. SDG&E clarifies that the unit cost of $8,711,500 is incorrect for two reasons. First, it was calculated with an erroneous Expected Implementation Cost in Table 6-1, and second, it is inappropriate to calculate unit costs using total annual/cyclical costs and annual/cyclical miles. That said, all costs presented by SDG&E refer to energized mile costs.
   iii. The unit cost of approximately $2.18M that was included in the May 21, 2025 2026-2028 Base Wildfire Mitigation Plan Workshop on slide 96 represents a cost per energized mile.
   iv. SDG&E clarifies that the unit cost of $8,711,500 is incorrect for two reasons. First, it was calculated with an erroneous Expected Implementation Cost in Table 6-1, and

second, it is inappropriate to calculate unit costs using total annual/cyclical costs and annual/cyclical miles. Therefore, the costs in question are not comparable.

v. The unit costs presented during the workshop of $2.18M/mile in direct costs comprise $2M/mile for installation and $0.18M/mile for foundational elements, whereas the cost of $1.93 million presented in SPD-SDGE-SB884-07_Q15_CC.xlsx is for installation only. These two costs are not comparable in that one includes lifecycle foundational costs and the other does not. However, SDG&E points out that the installation cost of $2M/mile in the workshop slides is comparable to $1.93M/mile in SPD-SDGE-SB884-07_Q15_CC.xlsx.

vi. SDGE Response SPD-SDGE-SB884-07_Q15_UG.xlsx workbook was not used in the WMP.

vii. SDGE Response SPD-SDGE-SB884-07_Q15_UG.xlsx workbook was not used in the workshop.

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QUESTION 6

Did SDG&E incorporate the "savings" of operational mitigations like vegetation management when it calculated the cost-benefit ratio of strategic undergrounding in its 2026-2028 Base Wildfire Mitigation Plan?

a. If so, provide a step-by-step explanation of how "savings" were integrated into the formula or calculating a CBR in the WMP.

RESPONSE 6

a. No. SDG&E does not incorporate the savings of operational mitigations not performed.

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QUESTION 7

Did SDG&E incorporate the "savings" of operational mitigations like vegetation management when it calculated the cost-benefit ratio of undergrounding in its RAMP Application filed on May 15 2025?

a. If so, is it synonymous with what was done in the WMP?
    i. If it is not synonymous, provide a step-by-step explanation of how "savings" were integrated into the formula for calculating a CBR in the RAMP.

RESPONSE 7

No. SDG&E does not incorporate the savings of operational mitigations not performed.

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SDG&E RESPONSE

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QUESTION 8

On page 83 of SDG&E's 2026-2028 Base Wildfire Mitigation Plan, it is mentioned that an optimization algorithm is being developed that "selects feeder segment bundles that, when upgraded, would minimize the anticipated residual wildfire and PSPS risks while maintaining a cost-benefit ratio greater than 1 (i.e., a net benefit) for the upgraded bundle". Provide any documentation related to this optimization algorithm that currently exists.

a. If the optimization algorithm is still being developed, explain how mitigations were selected for feeder segments presented in SDG&E's 2026-2028 Base Wildfire Mitigation Plan.

b. According to the SUG_2028_comp and CC_2028_comp spreadsheets within the SDGE_20262028_BaseWMP_Appendix_G_Supporting_Data_Errata.xlsx workpaper, the 211-312R feeder segment currently exhibits a CBR of below 1 for the WACC and Hybrid Discount Scenarios for undergrounding and for covered conductor for all of the discount scenarios. Does that mean the optimization algorithm would not recommend hardening the 211-312R feeder segment?

i. If the algorithm would not recommend hardening, what other mitigations would SDG&E employ to address the risk on this feeder segment?

ii. If would still recommend hardening, explain why.

RESPONSE 8

a. Yes, the algorithm used to support mitigation selection is still under development and thus no documentation exists at this time. In the interim, SDG&E's subject matter experts manually selected feeder segments by reviewing baseline risk, risk reduction potential, residual risk, and cost-benefit analysis across consecutive upstream and downstream segments.

b. No, the algorithm does not automatically exclude feeder segments with a cost-benefit ratio (CBR) below 1. Instead, it is designed to optimize mitigation selection by evaluating combinations or "bundles" of consecutive upstream and downstream feeder segments. The goal of this bundling process is to minimize anticipated residual wildfire PSPS risks while ensuring that the overall bundled mitigation maintains a CBR greater than 1.

Feeder segments with individual CBRs below 1 are still within the scope of the optimization algorithm. These segments may be included in a bundled mitigation package if their inclusion contributes to a net risk reduction that justifies the investment when considered alongside adjacent segments with higher CBRs. This approach allows the

algorithm to account for system-level benefits and interdependencies that may not be realized when evaluating segments in isolation.

i. The algorithm is designed solely to calculate bundled mitigation metrics and does not generate recommendations on whether to harden or not harden individual feeder segments.

ii. Refer to response "i" above.

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END OF REQUEST