



Shivani Sidhar
Regulatory Case Manager
San Diego Gas and Electric Company
8330 Century Park Court
San Diego, CA 92123-1530

September 29, 2016

Sent Via Electronic Mail

A.15-09-010
Wildfire Expense Memorandum Account

Mr. Don Kelly
Utility Consumers' Action Network
3405 Kenyon Street Suite 401
San Diego, CA 92110

Re: SDG&E Response to UCAN Data Request 04 - WEMA

Dear Mr. Kelly:

Attached please find SDG&E's response to UCAN Data Request 4 (UCAN-SDG&E-A.15-09-010-4), dated September 15, 2016. SDG&E's response includes general objections and narrative responses.

If you have any questions or require additional information, please feel free to contact me by phone at (858) 637-7914 or e-mail: SSidhar@semprautilities.com.

Sincerely,

Signed

Shivani Sidhar
Regulatory Case Manager

Enclosures

cc: Chris Lyons – SDG&E
Stacie Atkinson – SDG&E

UCAN DATA REQUEST
UCAN-SDG&E DR-04, Q1-3
SDG&E WEMA PROCEEDING - A.15-09-010
SDG&E RESPONSE
DATE RECEIVED: September 15, 2016
DATE RESPONDED: September 29, 2016

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, statutory mediation confidentiality (see Cal. Evid. Code §§ 1115-28) 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.

UCAN DATA REQUEST
UCAN-SDG&E DR-04, Q1-3
SDG&E WEMA PROCEEDING - A.15-09-010
SDG&E RESPONSE
DATE RECEIVED: September 15, 2016
DATE RESPONDED: September 29, 2016

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. With respect to the Office of Ratepayer Advocates, however, SDG&E will produce such information subject to the requirements of Public Utilities Code Section 583 and General Order 66-C.

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 (A.15-09-010) and for no other purpose.

**UCAN DATA REQUEST
UCAN-SDG&E DR-04, Q1-3
SDG&E WEMA PROCEEDING - A.15-09-010
SDG&E RESPONSE
DATE RECEIVED: September 15, 2016
DATE RESPONDED: September 29, 2016**

III. RESPONSES

Request 1:

In Mr. Vanderburg's testimony on page two he states:

“The purpose of my testimony is to discuss the weather conditions at the time of the massive wildfire outbreak in Southern California that began in late October 2007”

On page 11 of Mr. Vanderburg's testimony he states:

“I can calculate what the wind speed would have been in the area of the Witch Fire ignition on October 21, 2007. According to my calculations, the peak wind gust at West Santa Ysabel in October 2007 would have been 1.56 times stronger than what was observed at the Julian RAWS. This means that the peak wind gusts at West Santa Ysabel were likely to have been approximately 92 mph at that time.

In Mr. Vanderburg's testimony he notes that the peak winds at the West Santa Ysabel were likely 92 miles per hour “at that time”.

- a. What time period is Mr. Vanderburg referring to when he says “at that time”? Is he referring to the ignition time of the Witch fire? If so, what time did Mr. Vanderburg determine was the ignition time for the Witch fire and from what report or document did Mr. Vanderburg obtain this information?
- b. If Mr. Vanderburg is referring to a time period other than the time of the ignition time of the Witch Fire, please explain what the time refers to.
- c. Does the 92 mph referred to in Mr. Vanderburg's testimony correspond to the wind speed at the time of the ignition or does it refer to the maximum wind speed for the most severe gust of wind during the entire Santa Ana event in the area of the Witch fire ignition?
- d. If the 92 mph refers to the maximum wind gust at the Santa Ysabel weather station during the entire Santa Ana event in October 2007 and not the maximum wind gust speed at the ignition time of the Witch fire, has Mr. Vanderburg estimated what the wind speed was at the ignition time of the Witch fire? If so, please provide that information.

UCAN DATA REQUEST
UCAN-SDG&E DR-04, Q1-3
SDG&E WEMA PROCEEDING - A.15-09-010
SDG&E RESPONSE
DATE RECEIVED: September 15, 2016
DATE RESPONDED: September 29, 2016

Objection: SDG&E objects to this request on the grounds set forth in General Objections 3. Subject to the foregoing objection, SDG&E responds as follows.

Response:

- a. The phrase “at that time” refers to the peak of the event.
- b. See response to subpart (a) above.
- c. The 92 mph estimate refers to the peak 3-second wind gust at WSY for the entire Santa Ana wind event
- d. No.

**UCAN DATA REQUEST
UCAN-SDG&E DR-04, Q1-3
SDG&E WEMA PROCEEDING - A.15-09-010
SDG&E RESPONSE
DATE RECEIVED: September 15, 2016
DATE RESPONDED: September 29, 2016**

Request 2:

How far in distance is the West Santa Ysabel weather station from the ignition point of the Witch fire?

Response:

Approximately 0.6 km.

**UCAN DATA REQUEST
UCAN-SDG&E DR-04, Q1-3
SDG&E WEMA PROCEEDING - A.15-09-010
SDG&E RESPONSE
DATE RECEIVED: September 15, 2016
DATE RESPONDED: September 29, 2016**

Request 3:

As noted above, Mr. Vanderburg's testimony provides a wind speed estimate "in the area of the Witch fire ignition on October 21, 2007". Please provide the longitude and latitude coordinates that Mr. Vanderburg determined was the ignition point for the Witch fire.

Please name and provide the document or report that Mr. Vanderburg relied on for this information.

Please also provide the longitude and latitude coordinates for the "area" of the Witch fire that Mr. Vanderburg examined which he refers to in his testimony.

Response:

The CalFire Report specified coordinates of North 33° 04' 59.1" and West 117° 41' 38.9", although Mr. Vanderburg believes the West 117° was an error and should actually be West 116°. As explained on page 13 of Mr. Vanderburg's direct testimony, the "area" refers to the West Santa Ysabel weather station.