

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.

Date Received: 9/10/2024

Date Responded: 12/20/24

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 request and for no other purpose.

1. Data Request SPD_WSPS_SDG&E_2024_004

Complete tabs 2 through 6 of the attached spreadsheet. For tabs 2 through 5, complete a corresponding data row for each of the 94 mitigation initiatives in the most recent QDR, Table 11 according to the directions in the spreadsheet and the two attached guidance documents listed below:

Guidance for WMP Cost Reporting (applicable to tab 2 through 5)

Guidance for Account Tracking (applicable to tab 6)

SDG&E Response:

Please see the attached file titled: “SDGE WMP Cost Reporting Template 20241220.xlsx”

SDG&E respectfully notes that certain requests within the cost reporting template seek data that is not in the possession of, nor currently known to SDG&E. Of particular note, SDG&E’s Test Year 2019 General Rate Case Decision (D.) 19-09-051 pre-dated many WMP requirements and the testimony in support of that decision and associated forecasts pre-dated the finalization of the HFTD. Thus, D.19-09-051 did not authorize units of work or costs for specific wildfire mitigation initiatives (many of which were unknown and not included in SDG&E’s 2017 GRC forecasts), nor were costs or units of work authorized separately for HFTD and non-HFTD. SDG&E has endeavored to make several assumptions in an effort to respond to the data request, which are further explained below.

Further, SDG&E’s Test Year 2024 General Rate Case, which authorized wildfire mitigation related costs and revenue requirement for 2024 through 2027, was approved by the California Public Utilities Commission on December 19, 2024; SDG&E is still in the process of understanding and calculating authorized revenue related to its wildfire mitigation forecasts. SDG&E will supplement with Authorized data where applicable and possible by January 10. As 2024 is not yet complete, nor have 2024 totals been reflected in SDG&E’s accounting system, SDG&E can provide 2024 actuals consistent with its Fourth Quarter 2024 WMP Quarterly Data Report submission to the Office of Energy Infrastructure Safety on February 1, 2025.

Further, SDG&E’s actual costs for 2024 will not be final as of February 1, 2025 due to ongoing reconciliation and accounting procedures. Final actual values will be reported in SDG&E’s 2024 Annual Report on Compliance, as submitted to the Office of Energy Infrastructure Safety in April 2025. SDG&E is thus reporting currently available information for all categories. This data represents a snapshot in time as of December 20, 2024 and is subject to change as SDG&E incorporates its 2024 GRC decision, prepares its 2023 cost and unit analysis for Track 3 of the General Rate Case, and finalizes 2024 actuals.

A listing of overall assumptions used to compile the data presented in “SDGE WMP Cost Reporting Template 20241220” can be found below. Notes and assumptions related to specific fields within SDG&E’s response are included in the attached files “Guidance for WMP Cost Reporting_SDGE Response” and “Guidance for Accounts Tracking 2024_11_SDGE Response”.

- 2023 WMP Units are actuals, 2024 and 2025 WMP units are planned (consistent with SDG&E’s approved 2025 WMP update). For initiatives with multiple budget codes or

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orders, the WMP units were presented once per initiative tracking ID. For the initiatives with both capital and O&M direct costs, the costs were broken out separately and the WMP units were repeated for each section.

- 2023 cost and unit actuals are subject to change pending ongoing accounting analysis and audits performed in preparation of SDG&E’s Track 3 filing in A.22-05-015/016.
- WMP unit types were based on WMP data; WMP actual units are sourced from reviewing GIS data and the unit assumptions were applied to authorized dollars where RSAR unit types differed from WMP unit types. For all other workpapers included as part of the annual RSAR filings, authorized cost and unit data is sourced from the 2023 RSAR. For additional information regarding SDG&E’s calculation of units and dollars authorized in SDG&E’s Test Year 2019 General Rate Case, please see SDG&E’s Response to Administrative Law Judges’ Ruling, Dated August 6, 2024, submitted August 16, 2024 in Track 2 of A.22-05-016.
- SDG&E does not track spend by geographical location except as noted for certain WMP units. Furthermore, units presented and approved in the WMP are not specified by location (i.e., HFTD, non-HFTD). However, SDG&E provides the breakdown of location based on actual work performed for 2023 and the initiative’s WMP scope for 2024 and 2025. Regarding 2023, in most cases, work units and dollars split by location (i.e., HFTD, non-HFTD) were not presented in SDG&E’s 2019 GRC Application and therefore were not specifically defined or authorized in the Commission’s 2019 GRC Final Decision. Presenting authorized and actual work units and also geographical splits when these data points were not explicitly defined or authorized presents a challenge, further assumptions regarding these splits are discussed below.
- Assumptions and additional discussion regarding HFTD splits:
 - GRC authorized capital costs for the WMP portfolio were allocated as 100% HFTD and actual costs were split based on location consistent with units; there was no HFTD split for programs that support total company operations, as these foundational initiatives are not location specific.
 - For GRC authorized O&M costs for the WMP portfolio, SDG&E used actual units’ HFTD splits and applied to authorized; there was no HFTD split for programs that support total company operations, as these foundational efforts are not location specific.
 - Where possible, SDG&E followed actual HFTD splits, using the same assumptions for capital and O&M.
- SDG&E did not calculate unit cost (where units are available) because there is not a methodology to determine HFTD units compared to non-HFTD units. For example, it may cost more to perform work in the HFTD compared to non-HFTD, but as this analysis was not performed, nor does it relate to SDG&E’s authorized costs, it is not reasonably possible or practical to calculate this work split.
- RSEs provided are the WMP RSEs for the entire 2023-2025 WMP cycle.