

**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALPA-SDGE-2025WMP-09  
SDG&E RESPONSE**

**Date Received: May 29, 2024  
Date Submitted: June 10, 2024**

**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

**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALPA-SDGE-2025WMP-09  
SDG&E RESPONSE**

**Date Received: May 29, 2024  
Date Submitted: June 10, 2024**

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.

**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALPA-SDGE-2025WMP-09  
SDG&E RESPONSE**

**Date Received: May 29, 2024  
Date Submitted: June 10, 2024**

**QUESTION 1**

SDG&E's three-wire uni-grounded primary circuits at or below 35 kV (nominal) please describe, with references to SDG&E's procedures:

- a) SDG&E's fast-trip (known as Sensitive Relay Profile, or SRP) line-current thresholds;
- b) How SDG&E's fast-trip line-current thresholds are calculated from measured circuit values;
- c) The intentional delays assigned to those line-current thresholds;
- d) SDG&E's fast-trip ground-current thresholds;
- e) How SDG&E's fast-trip ground-current thresholds are calculated from measured circuit values;
- f) The intentional delays assigned to those ground-current thresholds; and
- g) How the current (both line and ground) and delay thresholds differ from non fast-trip settings.

**RESPONSE 1**

- a) SRP phase settings are derived from a five-year SCADA data analysis for each device and are specific to the device.
- b) The phase setpoint is determined by applying a 150% factor to the historical peak load.
- c) Phase setpoints are instantaneous elements with a half-cycle delay.
- d) SRP residual ground settings are derived from a five-year SCADA data analysis for each device.
- e) The ground setpoint is established by rounding the highest recorded ground current to the nearest 5 amps and adding 15 amps of margin to prevent mis-operations.
- f) Residual ground setpoints are instantaneous elements with a half-cycle delay.
- g) SRP settings are designed to be highly sensitive and very fast to trip using instantaneous setpoints calibrated as explained in a-f. Normal profile settings (non fast-trip settings) incorporate inverse time overcurrent elements in addition to instantaneous overcurrent elements. The setpoints for these elements are higher to allow for coordination with downstream fuses and other protective devices.

**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALPA-SDGE-2025WMP-09  
SDG&E RESPONSE**

**Date Received: May 29, 2024  
Date Submitted: June 10, 2024**

**QUESTION 2**

For SDG&E's four-wire multi-grounded primary circuits at or below 35 kV please describe, with references to SDG&E's procedures:

- a) SDG&E's fast-trip line-current thresholds;
- b) How SDG&E's fast-trip line-current thresholds are calculated from measured circuit values;
- c) The intentional delays assigned to those line-current thresholds;
- d) SDG&E's fast-trip ground-current thresholds;
- e) How SDG&E's fast-trip ground-current thresholds are calculated from measured circuit values;
- f) The intentional delays assigned to those ground-current thresholds; and
- g) How the current and delay thresholds differ from non fast-trip settings.

**RESPONSE 2**

See SDG&E's response to question 1.

**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALPA-SDGE-2025WMP-09  
SDG&E RESPONSE**

**Date Received: May 29, 2024  
Date Submitted: June 10, 2024**

**QUESTION 3**

For SDG&E's circuits above 35 kV, but not classified as part of the NERC bulk electric system, please describe, with references to SDG&E's procedures:

- a) SDG&E's fast-trip line-current thresholds;
- b) How SDG&E's fast-trip line-current thresholds are calculated from measured circuit values;
- c) The intentional delays assigned to those line-current thresholds;
- d) SDG&E's fast-trip ground-current thresholds;
- e) How SDG&E's fast-trip ground-current thresholds are calculated from measured circuit values;
- f) The intentional delays assigned to those ground-current thresholds; and
- g) How the current and delay thresholds differ from non fast-trip settings.

**RESPONSE 3**

SDG&E does not use fast-trip settings on lines greater than 35kV. All lines greater than 35kV are considered transmission and are part of a loop system which allows fast protection methods without implementing fast-trip settings similar to the distribution system.

**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALPA-SDGE-2025WMP-09  
SDG&E RESPONSE**

**Date Received: May 29, 2024  
Date Submitted: June 10, 2024**

**QUESTION 4**

For SDG&E's circuits above 35 kV and classified as part of the NERC bulk electric system please describe, with references to SDG&E's procedures:

- a) SDG&E's fast-trip line-current thresholds;
- b) How SDG&E's fast-trip line-current thresholds are calculated from measured circuit values;
- c) The intentional delays assigned to those line-current thresholds;
- d) SDG&E's fast-trip ground-current thresholds;
- e) How SDG&E's fast-trip ground-current thresholds are calculated from measured circuit values;
- f) The intentional delays assigned to those ground-current thresholds; and
- g) How the current and delay thresholds differ from non fast-trip settings.

**RESPONSE 4**

See SDG&E's response to question 3.

**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALPA-SDGE-2025WMP-09  
SDG&E RESPONSE**

**Date Received: May 29, 2024  
Date Submitted: June 10, 2024**

**QUESTION 5**

Please provide the list of circuits that are directly upstream of SDG&E's distribution lines, including the following information:

- a) Circuit name;
- b) Voltage; and
- c) Whether the circuit is part of the NERC bulk electric system.

**RESPONSE 5**

SDG&E has provided "SDG&E Response CalAdvocates-SDGE-2025WMP-DR 09\_Q5.xlsx" which includes a column for the distribution circuit, the associated transmission lines that feed those circuits, and whether at least 1 of the transmission lines are BES. The voltage of the transmission line is part of the name, TL6XX are 69kV and TL138XX are 138kV lines.

**PUBLIC ADVOCATES OFFICE DATA REQUEST:  
CALPA-SDGE-2025WMP-09  
SDG&E RESPONSE**

**Date Received: May 29, 2024  
Date Submitted: June 10, 2024**

**END OF REQUEST**