

ENERGY SAFETY DATA REQUEST: OEIS-P-WMP-2024- SDGE-04
SDG&E RESPONSE

Date Received: May 24, 2024
Date Submitted: May 30, 2024

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 the Discrepancy Between Targets in the 2025 WMP Update (Table 6) and Errata Version of the 2023-2025 WMP:

There is a discrepancy between the projected targets in the 2025 WMP Update (Table 6, pp. 20-21) and 2023-2025 WMP Redline Non-Substantive Errata Version (OEIS Table 8-4, pp. 149-150) from May 14, 2024, for several initiatives (WMP.479, WMP.481, WMP.482, WMP.483, WMP.489, WMP.1190). Where can Energy Safety find the correct projected targets for these initiatives?

RESPONSE 1

The correct 2025 updated targets are reflected in SDG&E's 2025 WMP Update Table 6: Qualifying Changes in Targets and Expenditures.

SDG&E notes that Table 8 of the 2025 WMP Update also contains discrepancies in year-end targets for WMP.483, WMP.489, and WMP.1190 and requests to submit a non-substantive errata reflecting the corrections. Additionally, SDG&E requests to submit another errata for its 2023-2025 WMP Redline to correct OEIS Table 8-4.

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QUESTION 2

Regarding the Projected O&M Expenditures for Risk Assessment and Mapping (WMP.442) in the 2025 WMP Update (Table 7):

Comparing submissions from SDG&E, SDG&E reported a change in 2025 projected O&M expenditures for Risk Assessment and Mapping (WMP.442) of -14% in Table 7 (p. 21) of its initial, April 2, 2024, submission of its 2025 WMP Update. In the same document, SDG&E reported a change in O&M expenditures in the narrative for that initiative of +100% (“increased by 100%,” p. 36). In the subsequent May 14, 2024, submission of the 2025 WMP Update, SDG&E indicates in its cover letter (p. 3, Items 11-12) that the narrative Section 2.2.7.1, “Risk Assessment and Mapping (WMP.442)” was deleted from the document and the line pertaining to WMP.442 was deleted from Table 7 since the change was not reportable. Energy Safety presumes this refers to the -14% change, which falls below the threshold for reportability (more than \$10 million or more than a 20 percent change in planned total expenditure). However, the percent change in expenditures reported in the narrative was above the reportability threshold. What is the correct change in 2025 projected O&M expenditures for Risk Assessment and Mapping (WMP.442)?

RESPONSE 2

The correct change in O&M expenditures for Risk Assessment and Mapping (WMP.442) is -14% as reflected in Table 7 of SDG&E’s 2025 WMP Update. SDG&E’s errata 2025 WMP Update submitted on May 14, 2024 removed the corresponding narrative section for WMP.442 because the expenditure change did not meet the criteria for reportable updates. However, it failed to remove WMP.442 from Table 7. SDG&E requests to submit a non-substantive errata to correct this and will remove WMP.442 from Table 7.

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QUESTION 3

Regarding the Change in Quarterly Asset Inspection Targets in the 2025 WMP Update (Table 8):

In the May 14, 2024, submission of the 2025 WMP Update, SDG&E indicates in its cover letter (p.3, Item 14) that “Inspection targets [were] updated” in Table 8 (p. 40) because “2025 Inspection Targets changed.” In Table 8, SDG&E changed the targets it had given in the initial, April 2, 2024, for two initiatives as follows:

- Distribution Wood Pole Intrusive Inspections (WMP.483)
 - Target End of Q3 2025 & Unit: changed from 344 to 0
 - End of Year Target 2025 & Unit: changed from 344 to 0
 - % Risk Impact 2025: changed from 0.03% to 0.00%

- Transmission Wood Pole Intrusive Inspections (WMP.1190)
 - End of Year Target 2025 & Unit: changed from 114 to 141

- Transmission Overhead Patrol Inspections (WMP.489)
 - Target End of Q2 2025 & Unit: changed from 3,766 to 6,008
 - Target End of Q3 2025 & Unit: changed from 5,650 to 6,337
 - End of Year Target 2025 & Unit: changed from 7,533 to 6,337

a. Were these targets changed in error?

- i. If not, were these changes correcting typos in the original submission from April 2, 2024?
- ii. If these changes were not correcting typos, on what basis is SDG&E changing these targets in a non-substantive errata version of its 2025 WMP Update?

RESPONSE 3

The changes to year-end targets in Table 8 of the 2025 WMP Update errata submission on May 14, 2024 were made in error. SDG&E requests to submit a non-substantive errata correcting these changes and reverting back to its initial April 2, 2024 target values for the initiatives listed above.

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END OF REQUEST