

ENERGY SAFETY DATA REQUEST: OEIS-P-WMP-2024- SDGE-006
SDG&E RESPONSE

Date Received: June 19, 2024
Date Submitted: June 24, 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 SDG&E’s Distribution Asset Inspection Programs:

- a. Provide the number of inspections performed and find rate of level 1 and 2 conditions from January 1, 2020, to December 31, 2023, for the following inspection programs. If the inspection program began after January 1, 2020, specify the start date of the program.
 - i. Drone Assessments (WMP.552)
 - ii. Distribution Overhead Detailed Inspections (WMP.478)
 - iii. Distribution Wood Pole Intrusive Inspections (WMP.483)
 - iv. Distribution Overhead Patrol Inspections (WMP.488)

- b. For the Drone Assessments inspection program:
 - i. Provide the estimated percentage of conditions that SDG&E would likely not have identified through overhead detailed, patrol, or intrusive pole inspections prior to failure.
 - ii. Describe how SDG&E calculated this estimated percentage.

RESPONSE 1

a. See attached spreadsheet titled “SDGE Response OEIS-P-WMP-2024 SDGE-006.xlsx.”

b.
i. Drone inspections, overhead detailed inspections, patrols, and intrusive inspections are very different types of inspections. Patrols are focused on “catastrophic” type inspections; General Order 165 describes a patrol inspection “as a simple visual inspection, of applicable utility equipment and structures, that is designed to identify *obvious* structural problems and hazards.” (emphasis added). Wood pole intrusive inspections are similarly focused on any degradation to bottom portion of the pole both subsurface and interior.

Drone inspections are focused on inspections of otherwise difficult to see or identify – i.e. non-obvious – potential hazards. Accordingly, the most comparable programs are the drone inspections and the overhead detailed inspections. SDG&E’s analysis of these two programs found that inspections using drone imagery identified approximately 30% more issues than traditional ground-based inspections when the inspections occurred within 60-days of each other.

ii. The 30% estimate was calculated by reviewing data for 7,581 poles inspected via drone and ground by separate and independent inspectors, where the inspections occurred within 60 days of each other. So, while it cannot be 100% confirmed that the issues were present during both types of inspections, there is a high likelihood because of the timeframe that the issues were the same during both inspections.

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QUESTION 2

Regarding SDG&E’s Transmission Asset Inspection Programs:

- a. Provide the number of inspections performed and find rate of level 1 and 2 conditions from January 1, 2020, to December 31, 2023, for the following inspection programs. If the inspection program began after January 1, 2020, specify the start date of the program.
 - i. Transmission Infrared Inspections (WMP.482)
 - ii. Transmission Overhead Detailed Inspections (WMP.479)
 - iii. Transmission Wood Pole Intrusive Inspections (WMP.1190)
 - iv. Transmission Overhead Patrol Inspections (WMP.489)

- b. For the Transmission Infrared Inspections program:
 - i. Provide the estimated percentage of conditions that SDG&E would likely not have identified through overhead detailed, patrol, or intrusive pole inspections prior to failure.
 - ii. Describe how SDG&E calculated this estimated percentage.

RESPONSE 2

- a. See attached spreadsheet titled “SDGE Response OEIS-P-WMP-2024 SDGE-006.xlsx.”

- b.
 - i. Conditions identified through transmission infrared inspections would likely not be found through detailed, patrol, or intrusive inspections because heat anomaly conditions are not visible to the inspector without thermographic equipment.

 - ii. See response to 2(b)(i).

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END OF REQUEST