

**CPUC WILDFIRE SAFETY AND PERFORMANCE SECTION DATA REQUEST:
SPD_WSPTS_2024_SDG&E_002
SDG&E RESPONSE**

**Date Received: June 10, 2024
Date Submitted: June 21, 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

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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.

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This Data Request (DR) pertains to Question 6 from Energy Safety’s DR sent on April 29, 2024. Energy Safety asked:

SDG&E states that its “projected O&M expenditures for Distribution Overhead System Hardening were increased due [to] historical O&M cost trend indicators” (p. 27, SDG&E 2025 Update). According to SDG&E’s 2025 Update, there is a projected **1,906 percent increase of 2025 O&M expenditure** for this initiative (p. 20, Table 6 “Qualifying Changes in Targets and Expenditures,” SDG&E 2025 Update). Provide further explanation of the “cost trend indicators” leading to this increase.

SDG&E Responded:

The cost trend indicators are based on recent historical actual costs and due to most of the projects forecasted in 2025 being **True-up remediation type projects, which are projects that are remediating issues found during our post construction engineering analysis** and are predominantly O&M in nature”

Based on this question and response answer the following questions.

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QUESTION 1

Provide list of all True-Up Remediation projects related to Distribution Overhead System Hardening (WMP.475)

- a. For each project, provide narrative on original intent of the job, including miles of hardening, and total number of units the project performed (ie, number of poles replaced).
- b. For each project, provide a narrative on the reason remediation was required. The answer should be specific. For instance, “SDG&E identified ‘X’ number of poles were damaged due to poor construction practice where the installer used a chain saw inappropriately and damaged a pole.” If there are multiple issues being remediated, each item should have a similar description.
- c. For each project, provide a narrative of the changes as the result of remediation, which includes a number of units where this remediation was performed.

RESPONSE 1

- a. The original intent of True-Up Remediation jobs is to correct any issues determined through our post-construction True-Up Analysis of the original hardening project. The True-Up Analysis is performed by the engineer of record who uses the as-built document provided by the Construction team and post-construction survey (typically LiDAR survey data) acquired and provided by SDG&E, and re-run pole loading calculations and wire clearances checks to ensure facilities meet or exceed General Order 95 and SDG&E standards. If issues are found, they are remediated via a True-Up Remediation job. For 2025, we cannot specify exactly which true-up remediation jobs will make up the workplan as we have not yet scheduled the jobs, but used historical information and subject matter expertise to make assumptions regarding the volume of work, which is approximately 250 jobs. Since the inception of Distribution Overhead System Hardening program, starting with the Fire Risk Mitigation Program (FiRM) in 2013, over 1,000 projects have been completed and over 14,000 poles and 700 miles of associated conductor have been replaced, removed, or installed. It’s important to note that only a small subset of poles and spans on a given hardening project require follow-up repairs on a True-Up Remediation job and is in the range of 10-20% of locations. For example, a typical job has approximately 30-40 poles and 10 locations will require follow-up repairs. And in some cases, no True-Up Remediation work is required.
- b. See answer 1.c.

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- c. Below is a list of the most common issues discovered during a True-Up Analysis and the remediation methods typically taken to resolve them:

Typical True-Up Analysis Findings	Typical Remediation
Communication to ground vertical clearance	Notify Communication Infrastructure Providers (CIP) to re-tension and/or relocate communication cable.
Secondary to communication vertical clearance	Re-tension conductor, relocate attachment height, notify communication infrastructure providers (CIP) to re-tension and/or relocate communication cable.
Secondary and communication sharing same weatherhead	Notify Communication Infrastructure Providers (CIP) to relocate communication cable off weatherhead
Secondary to ground vertical clearance	Re-tension conductor, relocate attachment height, re-arrange pole top configuration, replace pole with taller pole if re-tensioning or adjustments to pole top configuration are not sufficient
Secondary to building vertical clearance	Re-tension conductor, relocate attachment height, re-arrange pole top configuration, replace pole with taller pole if re-tensioning or adjustments to pole top configuration are not sufficient
Communication to building vertical clearance	Notify Communication Infrastructure Providers (CIP) to re-tension and/or relocate communication cable.

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Typical True-Up Analysis Findings	Typical Remediation
Primary to communication vertical clearance	Re-tension conductor, relocate attachment height, re-arrange pole top configuration, notify communication infrastructure providers (CIP) to re-tension and/or relocate communication cable, replace pole with taller pole if re-tensioning or adjustments to pole top configuration are not sufficient
Primary to ground vertical clearance	Re-tension conductor, relocate attachment height, re-arrange pole top configuration, replace pole with taller pole if re-tensioning or adjustments to pole top configuration are not sufficient
Horizontal conductor spacing on crossarm (aka pin spacing) insufficient	Re-arrange pole top configuration to increase spacing, install wider crossarm
Guy wire not properly sectionalized in barrel of proximity by means of an insulator	Install fiberglass strain insulator
Conductor Over-Tensioned	Retension conductor, re-arrange conductor, replace conductor
Crossarms Overloaded	Install additional crossarm, reframe crossarm, add span guy to back-up arm, replace crossarm
Poles overloaded	Install/Add anchor/guys, replace pole
Pole under-embedded	Reset pole, replace pole
Dampers required	Install dampers

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QUESTION 2

Provide breakdown of the 1906 percent increase in O&M expenditure by project.

- a. Provide project description and projected O&M expenditure. (it should add up to 1906%)
- b. Provide each work order related to the project.
- c. Provide breakdown of the O&M percentage that are engineering analysis and work-related O&M.

RESPONSE 2

- a. The total 2025 forecasted O&M expenditures for True-Up Remediation projects were estimated by escalating costs from 2024 by 3%.
- b. Work orders cannot be provided now as the specific projects have not been scheduled for 2025.
- c. SDG&E generally estimates the O&M percentage of costs to be approximately 30% for non-construction activities (engineering, design, land, environmental, permitting, project management) and approximately 70% to be work related (material, labor, equipment). However, costs will vary depending on the scope and complexity of the remediation job.

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QUESTION 3

Provide the work product of post construction engineering analysis used to justify each True-Up Remediation Project.

- a. Provide support documentations such as photos, details on the project change orders.

RESPONSE 3

- a. See the following attached True-Up analysis reports for two sample projects that illustrate the engineering true-up analysis performed on projects:
 - FiRM-C221-F_TRUE-UP_REPORT_2020-01-09_Redacted.pdf
 - FiRM-C237-O_TRUE-UP_REPORT_2021-07-23_Redacted.pdf

Please note that employee names and other personally identifiable information have been redacted as it is not related to WSPS's request.

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END OF REQUEST