

SAFETY POLICY DIVISION DATA REQUEST SPD-DR 010

SDG&E/SOCALGAS 2021 RAMP REPORTS- A.21-05-011/014

DATE RECEIVED: AUGUST 20, 2021

DATE RESPONDED: SEPTEMBER 1, 2021

Question 01:

In its RAMP filing, SDG&E examines Significant Injuries and Fatalities, or SIFs, due to its equipment. Unlike PG&E and SCE in their prior RAMP filings, SDG&E in examining this risk distinguishes between SIFs that are due to contact with intact equipment and those that are due to contact with failed equipment. In the chapter on Electric Infrastructure Integrity, SIFs are examined for contact with failed equipment outside SDG&E's High Fire Threat Districts.

Please provide SDG&E SIF data that demonstrates which incidents involved 1) intact equipment in the HFTDs, 2) failed equipment in the HFTDs, 3) intact equipment outside the HFTDs and 4) failed equipment outside the HFTDs, providing this information for distribution and transmission assets separately.

SDG&E Response 01:

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence. SDG&E also objects to this request on the grounds that it seeks information that is beyond the scope of the issues raised in the 2021 RAMP proceeding as well as the CPUC's jurisdiction. Specifically, the request appears to seek information regarding programs and/or metrics that are under the jurisdiction of other regulatory bodies, including FERC electric transmission activities or transmission-related SIFs. These non-CPUC regulated activities are not included in the scope of this response. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

As part of replying to the question, SDG&E provides the following clarifications:

- The use of SIF data within SDG&E's 2021 RAMP Report was not as a risk but as a consequence of a risk event occurring;
- SIF data related to SDG&E's intact electrical assets analyzed in the 2021 RAMP is based on system-wide data, *i.e.*, it is indifferent whether the assets are located in HFTD or non-HFTD areas; and
- The quantitative analyses in SDG&E's 2021 RAMP Report focuses on CPUC jurisdictional activities.¹ Accordingly, programs or metrics that are under the jurisdiction of other regulatory bodies, including FERC electric transmission activities or transmission-related SIFs, are not included in this response.

¹ See SDG&E RAMP chapter SDG&E-Risk-2 at page SDG&E-2-27.

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SDG&E Response 01: CONTINUED

Non-wildfire risk related SIF data (Electric Infrastructure Integrity and Customer and Public Safety – Contact with Electric Equipment chapters)

SDG&E considers safety incidents related to intact electric equipment to be in scope of the RAMP risk of Customer and Public Safety – Contact with Electric Equipment (SDG&E-Risk-5), whereas safety incidents related to equipment failure are in scope of the RAMP risk of Electric Infrastructure Integrity (EII) (SDG&E-Risk-2). As reflected in the supplemental workpapers for Electric Infrastructure Integrity (EII) and Customer and Public Safety – Contact with Electric Equipment, there was one (1) SIF attributed to contact with failed equipment and seven (7) SIFs attributed to contact with normally operating equipment during the 2015 – 2020 period. For purposes of this question only, the table below identifies the location of these SIF events relative to whether they occurred in a HFTD vs a non-HFTD and whether the risk was associated with intact equipment or equipment failure, *i.e.*, the SIF data is specific to the consequences associated with either of these risk events occurring and is indifferent to the location of the assets relative to being in a HFTD vs a non-HFTD.

SIFs In Non-Wildfire Risks Involving SDG&E's Electrical Distribution Equipment						
Risk	Non-HFTD		HFTD		Total	
	Intact	Failed	Intact	Failed	Intact	Failed
Customer and Public Safety – Contact with Electric Equipment	5	0	2	0	7 ²	0
Electric Infrastructure Integrity	0	1	0	0	0	1 ³
Total	5	1	2	0	7	1
Total	6		2		8	

Wildfire risk related SIF data (Wildfire chapter)

As reflected in the supplemental workpapers for Wildfire, an expected 10.24 SIF/year⁴ was used in the risk analysis calculations. This value is the result of empirical modeling that analyzed SIF on a holistic level, *i.e.*, this value does not distinguish between fatalities and serious injuries, and

² See reply to SPD DR#03 (July 9, 2021): Supplemental workpaper “Final 2021 Workpaper – SDG&E ContactwithElectric_Level 2.xlsx” ; : Cell “E15” in Tab: Risk Scoring Workpaper (1.17 incidents per year = 7 incidents occurring in the 6 year period 2015 – 2020).

³ See reply to SPD DR#03 (July 9, 2021): Supplemental workpaper “Final 2021 workpaper-SDG&E EII_Level 2.xlsx”: Cell “E50” in Tab: Risk Scoring Workpaper (0.17 incidents per year = 1 incidents occurring in the 6 year period 2015 – 2020).

⁴ See reply to SPD DR#03 (July 9, 2021): Supplemental workpaper “Final 2021 workpaper-SDG&E Wildfire_Level 2.xlsx”: Cell “E71” in Tab: Risk Scoring Workpaper.

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does not distinguish whether the wildfire was caused by equipment that had failed or was operating in a normal configuration. Aligning with the scope of the Wildfire risk focusing on mitigation initiatives that are targeted and prioritized in the Tier 2 and Tier 3 HFTDs, this SIF value is specific to the Tier 2 and Tier 3 HFTDs.