

**MGRA Data Request No. 1**  
**A.08-12-021**  
**SDG&E Response**  
**Date Received: February 9, 2009**  
**Date Responded: February 24, 2009**



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03-27-09  
04:59 PM

MGRA-1 The wind-speed trigger point for de-energization of power lines proposed in the San Diego Gas & Electric Application would be 35 mph sustained winds or 30 mph sustained winds with gusts of 55 mph. Please describe the factual basis, using any calculations or cited references, for the choice of this trigger point.

**SDG&E Response:**

Sustained winds of 35 mph create a condition where fire fighting is not effective. Should a fire start, for any reason, it will likely not be contained.

Per CPUC General Order 95, the structures must be designed to withstand a wind pressure of 8 pounds per square foot (psf). Eight pounds per square foot translates to a wind speed of 55 miles per hour per the following equation in its simplified form:

$8 \text{ Lbs/Sq Ft} = .0026(V^2)$  Where V is the wind velocity in miles per hour

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MGRA-2     The GO-95 Rule 43 specifies wind and ice loadings for light and heavy wind areas in terms of pressure applied to cylindrical and flat components. Please describe SDG&E's interpretation of this rule with respect to whether these loadings describe peak (gust) wind speeds or averaged wind speeds. Describe the wind speeds that SDG&E assumes for design of its facilities both in the heavy and light wind loading areas, and whether these are gust or averaged wind speeds.

**SDG&E Response:**

GO 95 makes no distinction between wind gusts or sustained wind speeds. SDG&E interprets that GO 95 Rule 43 applies to both sustained winds and wind gusts. SDG&E designs its facilities to withstand 8 psf of wind pressure on cylindrical surfaces and 13 psf on flat surfaces in light loading areas. In heavy loading areas SDG&E designs its facilities to withstand 6 psf of wind pressure on cylindrical surfaces and 10 psf on flat surfaces.

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MGRA-3 Please describe the relationship between the GO 95 Rule 43 wind loadings and the trigger point of de-energization in the SDG&E application. Is it SDG&E's plan that equipment designed and maintained as per the Rule 43 design requirements would be de-energized at wind levels lower than, greater than, or equal to the Rule 43 wind loadings.

**SDG&E Response:**

See Response to MGRA-1.

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MGRA-4     In its application, SDG&E describes one of its current activities to reduce fire risk as “Enhanced vegetation management”. Please describe the changes that have been made to SDG&E’s vegetation management program since October 2007.

**SDG&E Response:**

SDG&E Vegetation Management has expanded its hazard tree inspection practices to include tree species known to be subject to branch or root failure, and are positioned close enough to pose a threat to the power lines if the tree were to fail during adverse weather conditions. These trees may not present obvious, observable defects, but based on canopy structure, species type, site conditions, etc., may have a propensity to cause the tree to fail.

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MGRA-5     Please provide an estimate of what fraction of its distribution and transmission facilities in high fire risk areas (as defined by Cal Fire) have had the new enhanced vegetation management program applied since October 2007.

**SDG&E Response:**

SDG&E would like to first clarify that areas defined by CAL Fire should read High Fire Severity Zones and not high fire risk areas.

SDG&E service territory is divided into 133 Vegetation Management Areas (VMA), 117 VMAs are located in the CAL Fire High Fire Severity Zones (HFSZ) High and Very High. Of the 117 Vamps, SDG&E has applied the Enhanced inspection to 90 Vamps or 67 % of the Vamps in the HFSZ since May 2008.

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MGRA-6 SDG&E states in its application that: “One aspect of SDG&E’s Fire Preparedness Plan that is already being implemented is replacing certain wood poles with steel poles. These hardened facilities should be more resistant to damage in a wildfire and also should also reduce the time required to restore power after a large fire.” Please describe how many wooden poles have been replaced with steel poles since October 2007, and how many are planned for replacement over the next five years, on a yearly basis.

**SDG&E Response:**

As of February 19, 2009 SDG&E has replaced 663 wood poles with steel poles.

2009 – Approximately 1,100 wood-to-steel transmission and distribution pole replacements are anticipated under the assessment and evaluation plan

2010 through 2013 – SDG&E has not identified and evaluated specific pole replacements for years 2010 through 2013 to determine the total number, but SDG&E plans to continue the replacements at a rate similar to the years 2008 and 2009.

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MGRA-7 In Mr. Yari's testimony, he discusses hardening of infrastructure by replacement of wooden with steel pole. He states "These hardened facilities would also be designed to withstand extreme wind gusts of 85 mph." Is this design value inclusive of a safety factor? What would the speed be of a gust exceeding design requirements including safety factors?

**SDG&E Response:**

The 85 mph design criteria includes a safety factor. A wind gust exceeding 85 miles per hour would exceed the design requirements.

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MGRA-8 How many wooden poles are in Cal Fire high risk areas (threat level equal to 'High' or greater)? How many steel poles are in Cal Fire high risk areas.

**SDG&E Response:**

SDG&E facilities are attached to approximately 75,600 wooden poles and 2,000 steel poles within areas defined as "high" and "very high" fire risk by Cal Fire.

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MGRA-9 SDG&E's Application states that "SDG&E has undertaken an extensive communication and outreach effort regarding its Fire Preparedness Plan, including direct mail to potentially impacted customers, convening numerous customer meetings, participating in over 40 local community events and organization meetings, and extensive contact with Special Needs (low-income and medical baseline) and Essential customers." Please list the location, dates, times and invitees of the 40 community events mentioned in the Application.

**SDG&E Response:**

**Organization meetings/local community events held or attend to discuss SDG&E's Fire Preparedness Plan:**

<b>Date</b>	<b>Time</b>	<b>Organization</b>	<b>Location</b>	<b>Invitees/Comments</b>
09/02/08	3:00 pm	Emergency Services	County OES Office 5555 Overland Avenue Suite 1911 San Diego, CA 92123-1294	San Miguel Fire District Fire Chief Augie Ghio; Undersheriff Bill Gore County Office of Emergency Services Director Ron Lane
09/03/08	11:00 am	SD County Police Chiefs Monthly Meeting	Town and Country Hotel 500 Hotel Circle North San Diego, CA 92108	Monthly meeting which consisted of local police chiefs
09/04/08	9:30 am	SD County Fire Chiefs Monthly Meeting	Burn Institute 8825 Aero Dr # 200 San Diego, CA 92123	Monthly meeting which consisted of local fire chiefs
10/02/08	9:00 am	SD County Fire Chiefs Monthly Meeting	Burn Institute 8825 Aero Dr # 200 San Diego, CA 92123	Monthly meeting which consisted of local fire chiefs
10/02/08	11:30 am	City/County Management Association	Double Tree 11915 El Camino Real, San Diego, California, United States 92130-2539	Monthly meeting. Please contact them for list of invitees
10/06/08	10:00 am	Alpine Chamber of Commerce	Alpine Chamber 2707 Alpine Blvd Alpine CA 91901	Presentation to CEO Pat Cannon
10/09/08	10:00 am	Border Agency Fire Council Meeting	CDF Headquarters 2249 Jamacha Rd El Cajon, CA 92019	Fire Council Meeting. Please contact them for list of invitees
10/10/08	10:00 am	Fire Safe Council – South County Meeting	Crest Community Building 113 North Park Drive Crest, CA 92021	Fire Council Meeting. Please contact them for list of invitees
10/11/08	9:30 am	Alpine Fire Dept Open House	Alpine Fire Department 1364 Tavern Road Alpine, Ca 91901	Community Open House. Please contact them for list of invitees
10/11/08	8:00 am	Fallbrook Fire Protection District Open House	North County Fire Protection District 315 E. Ivy Street Fallbrook, CA 92028	Community Open House. Please contact them for list of invitees

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<b>Date</b>	<b>Time</b>	<b>Organization</b>	<b>Location</b>	<b>Invitees/Comments</b>
10/14/08	7:30 pm	County of San Diego Jamul Dulzura Community Planning Group	Oak Grove Middle School Library 14344 Olive Vista Dr Jamul, CA 91935	Community Planning Group Board – Meeting open to general public
10/14/08	9:00 am	Quarterly Disaster Prep Council	Campo Community Center 976 Sheridan Rd Campo, CA 91906	Quarterly meeting. Please contact them for list of invitees
10/14/08	11:00 am	San Diego County Water Authority	<a href="#">4677 Overland Avenue San Diego, CA 92123</a>	General Managers Meeting
10/15/08		San Diego County Office of Education	6401 Linda Vista Road, San Diego, CA	Meeting with the County Office Education including Superintendent of Schools Dr. Ward
10/16/08	9:00 am	San Diego County Water Authority	201 Vallecitos de Oro San Marcos, CA	Operations Directors Meeting
10/18/08	9:00 am	San Miguel Fire Station Regional Fire Safe Council Open House	Fire Station 22 11501 Via Rancho El Cajon, CA 92019	Community Open House. Please contact them for list of invitees
10/18/08	10:00 am	Ramona Fire Open House	Ramona Fire Department 829 San Vicente Rd Ramona, CA 92065	Community Open House. Please contact them for list of invitees
10/19/08	10:00 am	Escondido Street Fair	Corner of Broadway and South Valley Parkway (near City Hall at 201 N. Broadway)	Public Event. Please contact event organizer for list of invitees
10/21/08	7:00 pm	Crest Community Association	Crest Community Building 113 North Park Drive Crest, CA 92021	Community meeting. Please contact them for list of invitees
10/23/08	10:00 am	Forest Area Safety Taskforce	Palomar Ranger District 1634 Black Star Canyon Rd Ramona, CA 92065	Safety Taskforce meeting. Please contact them for list of invitees
10/25/08	11:00 am	Rebuild Escondido – Wildfire Commemoration Celebration	Kit Carson Park Amphitheatre 3333 Bear Valley Parkway Escondido, CA 92025	Community Event. Please contact event organizer for list of invitees
10/25/08	1:00 pm	Performing Arts and Fall Festival	Alpine Community Center 1830 Alpine Blvd Alpine, Ca 91901	Community Event. Please contact event organizer for list of invitees
10/28/08	6:00 pm	County of San Diego Jacumba Community Sponsor Group	Jacumba Branch 44605 Old Hwy 80 Jacumba, CA 91934	Community Sponsor Group Board – Meeting open to general public

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<b>Date</b>	<b>Time</b>	<b>Organization</b>	<b>Location</b>	<b>Invitees/Comments</b>
10/29/08	7:30 am	Poway Chamber of Commerce Governmental Affairs Committee Meeting	Poway Chamber of Commerce 13381 Poway Rd Poway, CA 92064	4J's Owner John McIver, Design Aide Owners Howard and Kathy Auten, Donald A Nunn Attorney at Law, Center for Health Care Marketing Officer Beth Schermer, Retired Chamber Member Vern Marston, Linda Perri, Hamburger Factory Restaurant Owner Phil Spear, Poway Sr. Mgmt Analyst Tony Winney, Poway Asst City Manager Penny Riley, and Poway Unified School District Board Member Linda Vanderveen
10/29/08	9:00 am	SD North Chamber of Commerce	SD North Chamber of Commerce 11650 Iberia Place Suite 220 San Diego, CA 92128	Met with CEO Michael Robinson
11/04/08	7:00 pm	County of San Diego Bonsall Community Sponsor Group	Bonsall Community Center 31505 Old River Rd Bonsall, Ca 92003	Community Sponsor Group Board – Meeting open to general public
11/06/08	10:00 am	SD County Farm Bureau	SD County Farm Bureau 1670 E Valley Parkway Escondido, CA 92027	Farm Bureau meeting.
11/06/08	7:00 pm	County of San Diego Ramona Community Planning Group	Ramona Community Center 434 Agua Lane Ramona, CA 92065	Community Planning Group Board – Meeting open to general public
11/06/08	7:00 pm	County of San Diego Boulevard Community Planning Group	Boulevard Fire Station 39919 Highway 94 Boulevard, CA 91905	Community Planning Group Board – Meeting open to general public
11/10/08	7:00 pm	County of San Diego Crest, Dehesa, Granite Hills, Harbison Canyon Community Planning Group	Harbison Canyon Ironside Park 326 Harbison Canyon El Cajon, CA 92019	Community Planning Group Board – Meeting open to general public
11/10/08	7:00 pm	County of San Diego Valley Center Community Planning Group	Valley Center Community Hall Basement 28246 Lilac Rd Valley Center, CA 92082	Community Planning Group Board – Meeting open to general public
11/12/08	7:00 pm	Emergency Fire Plan Presentation – Spring Valley Kiwanis Club	San Miguel Fire District 2850 Via Orange Way Spring Valley, CA 91978	Association meeting. Please contact them for list of invitees

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11/17/08	6:00 pm	SDG&E Hosted Fire Preparedness Community Open House – Valley Center	Valley Center High School Maxine Theater 31332 Cole Grade Valley Center, Ca 92082	Newspaper inserts of the Open House Fliers in the following community newspapers: Valley Roadrunner (11/12), and the Alpine Sun (11/13). Letter sent out to affected residents. Local High Schools received 300 copies for distribution.
11/18/08	6:00 pm	SDG&E Hosted Fire Preparedness Community Center Open House – Alpine  SDG&E Event	Alpine Community Center 1830 Alpine Blvd Alpine, Ca 91901	Newspaper inserts of the Open House Fliers in the following community newspapers: Valley Roadrunner (11/12), and the Alpine Sun (11/13) Fliers were left at the Potrero and Campo Libraries, Potrero Store, Alpine-Mtn Empire Chamber, and mailed to the Pine Valley CPG Chair for the Pine Valley Library. Local High Schools received 300 copies for distribution
11/19/08	6:00 pm	SDG&E Hosted Fire Preparedness Community Center Open House – Campo  SDG&E Event	Mountain Empire Senior High School 3305 Buckman Springs Rd Pine Valley, CA 91962	Newspaper inserts of the Open House Fliers in the following community newspapers: Valley Roadrunner (11/12), and the Alpine Sun (11/13) Fliers were left at the Potrero and Campo Libraries, Potrero Store, Alpine-Mtn Empire Chamber, and mailed to the Pine Valley CPG Chair for the Pine Valley Library. Local High Schools received 300 copies for distribution.
11/19/08	6:30 pm	County of San Diego Twin Oaks Community Sponsor Group	Twin Oaks High School 158 Cassou Rd San Marcos 92069	Community Sponsor Group Board – Meeting open to general public
11/20/08	7:00 pm	County of San Diego Descanso Community Planning Group	Descanso Town Hall 24536 Viejas Grade Descanso, CA 91916	Community Planning Group Board – Meeting open to general public

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11/24/08	7:00 pm	County of San Diego Campo/Lake Morena Community Planning Group	Campo Community Center 976 Sheridan Rd Campo, Ca 91906	Community Planning Group Board – Meeting open to general public
12/02/08	7:00 pm	County of San Diego Pala-Pauma Community Sponsor Group	Pauma Valley Community Center 16650 Hwy 76 Pauma Valley, CA 92061	Community Sponsor Group Board – Meeting open to general public
12/04/08	7:00 pm	County of San Diego San Dieguito Community Planning Group	Fire Station 1 16936 El Fuego Rancho Santa Fe, CA 92067	Community Planning Group Board – Meeting open to general public
12/08/08	7:00 pm	County of San Diego Julian Community Planning Group	Julian Town Hall 2129 Main Street Julian, CA 92036	Community Planning Group Board – Meeting open to general public
12/09/08	6:30 pm	County of San Diego Cuyamaca Community Sponsor Group	Cuyamaca Fire Station 34560 Engineers Rd Julian, CA 92036	Community Sponsor Group Board – Meeting open to general public
12/15/08	7:00 pm	County of San Diego Fallbrook Community Planning Group	Live Oak Elementary School 1978 Reche Rd Fallbrook, CA 92028	Community Planning Group Board – Meeting open to general public

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MGRA-10 Also list the location, dates, times and invitees of the customer meetings mentioned in the Application.

**SDG&E Response:**

<b>Date</b>	<b>Time</b>	<b>Organization</b>	<b>Location</b>	<b>Invitees/Comments</b>
11/17/08	6:00 pm	SDG&E Hosted Fire Preparedness Community Open House – Valley Center	Valley Center High School Maxine Theater 31332 Cole Grade Valley Center, Ca 92082	Newspaper inserts of the Open House Fliers in the following community newspapers: Valley Roadrunner (11/12), and the Alpine Sun (11/13). Local High Schools received 300 copies for distribution
11/18/08	6:00 pm	SDG&E Hosted Fire Preparedness Community Center Open House – Alpine	Alpine Community Center 1830 Alpine Blvd Alpine, Ca 91901	Newspaper inserts of the Open House Fliers in the following community newspapers: Valley Roadrunner (11/12), and the Alpine Sun (11/13) Fliers were left at the Potrero and Campo Libraries, Potrero Store, Alpine-Mtn Empire Chamber, and mailed to the Pine Valley CPG Chair for the Pine Valley Library. Local High Schools received 300 copies for distribution
11/19/08	6:00 pm	SDG&E Hosted Fire Preparedness Community Center Open House – Campo	Mountain Empire Senior High School 3305 Buckman Springs Rd Pine Valley, CA 91962	Newspaper inserts of the Open House Fliers in the following community newspapers: Valley Roadrunner (11/12), and the Alpine Sun (11/13) Fliers were left at the Potrero and Campo Libraries, Potrero Store, Alpine-Mtn Empire Chamber, and mailed to the Pine Valley CPG Chair for the Pine Valley Library. Local High Schools received 300 copies for distribution

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MGRA-11 Describe the extensive contact initiated by the company with special needs person, including how the contact was made, how many persons were contacted/identified and the geographical distribution of the special needs persons in the potential shut off regions of the county.

**SDG&E Response:**

Special needs/medically sensitive persons were identified by being enrolled in SDG&E's Medical Baseline program (MBL). Six hundred eighty seven (687) MBL customers living within the area identified as impacted areas were contacted through direct mail, telephone survey, and door-to-door outreach.

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MGRA-12 Please describe how many independently sectionalized service areas comprise the area proposed for potential de-energization.

**SDG&E Response:**

SDG&E has identified 17 service areas that are independently subject to potential de-energization should conditions of extreme fire risk develop. Each area is comprised of a grouping of electric facilities that are in or adjacent to the SDG&E highest risk fire areas, and have been associated with a nearby Remote Automatic Weather Station (RAWS).

It is extremely unlikely that an event would occur that requires all of the 17 areas to be de-energized at the same time. Should the need to de-energize occur, it is much more likely that it will be limited to only a few areas at most.