

APPENDIX A

**SDG&E's Responses to Data Requests (PUBADV-SDGE-008)
related to Additional Information provided by SDG&E on June 30,
2021**

**THE PUBLIC ADVOCATES OFFICE OF THE CPUC (CAL ADVOCATES) DATA
REQUEST: PUBADV-SDGE-008
A.20-07-003 SDG&E Tree Trimming Balancing Account (TTBA)
SDG&E RESPONSE**

**Date Received: July 1, 2021
Date Submitted: July 12, 2021**

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.

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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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III. RESPONSES

QUESTION 1:

Referring to SDG&E's Response to the Administrative Law Judge's Email Ruling Directing SDG&E to Provide Additional Information, Q. 3b, in the first table on p. 6, SDG&E shows a 4-year average of 2015-2018 TTBA costs broken down by Tree Trimming activities.

For each year in 2015-2018, provide the total annual TTBA cost associated with each activity listed in the table that SDG&E relied upon to create the 4-year average.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 1:

Please see the corresponding file titled, "PubAdv_SDG&E_008_RYD_Q1_Response.xlsx," under tab titled Consolidated Activities.

SDG&E notes that, because it does not track TTBA expenditures by activity level, such as those activities requested by and provided for in response to the Administrative Law Judge's Email Ruling Directing SDG&E to Provide Additional Information (ALJ Ruling), SDG&E had to use its best efforts to reconstruct TTBA total costs and to separate and assign costs to the requested categories.¹ To that end, SDG&E used different cost tracking mechanisms, such as fixed rate pricing "Activity Codes, to identify and assign costs to the categories requested in the ALJ Ruling. These tracking mechanisms may include additional items that are not directly tracked to the TTBA for regulatory accounting purposes, such as certain loaders. Thus, the total spend in the corresponding file "PubAdv_SDG&E_008_RYD_Q1_Response.xlsx" does not directly align with the total 2019 TTBA spend for tree trimming activities. While these loaders and other variables may not directly align with the total TTBA spend, the breakdown of costs by activity provided in the ALJ Ruling reflect the increases in spend by activity as described in the testimony of Michael Daleo in support of SDG&E's Application.

QUESTION 2:

Referring to SDG&E's Response to the Administrative Law Judge's Email Ruling Directing SDG&E to Provide Additional Information, Q. 3a, on p. 5, SDG&E provides a table of

¹ See SDG&E Response to the ALJ Ruling at Q3(a).

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“SDG&E’s best efforts to reconstruct the total costs and to separate and assign costs to the requested categories.”

Referring to data request PubAdv-SDG&E-005-RYD, Q. 2, dated September 25, 2020, Cal Advocates requested:

“Referring to “2019 TTBA O&M by categoryDR1Q1.xlsx” from SDG&E’s response to Data Request PUBADV-SDG&E-DR-001-RYD, question 1, provide the following:

- a. In an Excel spreadsheet, further break down the line item “Tree Trimming” (cell A18) by tree trimming activity. Ensure the line-item breakdown includes all tree trimming activities referenced in Exhibit SDG&E-01, including, but not limited to, expanded clearances, hazard tree removal, customer refusals, and enhanced audit.
- b. For each tree trimming category broken down in 2a, list both the total cost of the activity in 2019 and the cost of each activity that is attributed to the \$10.4 million undercollection.
- c. For each tree trimming category broken down in 2a, list the amount of the total cost associated with “Reliability” tree trims, and separate the amount associated with “Routine” tree trims.”

SDG&E’s response to PubAdv-SDG&E-005-RYD, Q. 2, did not provide a complete breakdown of 2019 Tree Trimming costs. SDG&E’s response states, “There is no single, specific tree-trimming activity attributed to the \$10.4 million undercollection.”

Please answer the following:

- a. Provide both the calculations and supporting documentation that SDG&E relied upon to construct the breakdown of Tree Trimming costs on p. 5 of its response to the ALJ Ruling.
- b. For each Tree Trimming activity on p. 5 of SDG&E’s response to the ALJ ruling, identify the line-items in SDG&E’s spreadsheet titled “2019 TTBA O&M by categoryDR1Q1.xlsx” (provided by SDG&E in response to data request PubAdv-SDG&E-001-RYD, Q. 1) that add up to each Tree Trimming activity listed on p. 5 of the table.
- c. Explain specifically why SDG&E was unable to provide this breakdown previously in response to Cal Advocates data requests, including PubAdv-SDG&E-005-RYD, Q. 2.

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- d. In the table SDG&E provides in response to the ALJ Ruling on p. 5, SDG&E separately lists “Hazard Tree” from other activities including “Field Memo,” “Removals,” “Pre-inspection,” “Auditing,” and “Refusals.”

Provide supporting documentation demonstrating that SDG&E does not include costs associated with “Hazard Tree” activities in any other activity listed in this table.

- e. Identify each Tree Trimming activity (e.g., inspections, removals, trimming, refusals) that SDG&E includes in its “Hazard Tree” category in the table on p. 5 of SDG&E’s response to the ALJ Ruling.

- f. For each of the following Tree Trimming Activities listed in the table on p. 5 of SDG&E’s response to the ALJ Ruling, provide supporting documentation demonstrating that “Hazard Tree” activities are not included in the listed costs:

Routine Trimming
Field Memo
Removals
Pre-Inspection
Auditing
Refusals
T&E

- g. For each of the Tree Trimming Activities listed on the table on p. 5 of SDG&E’s response to the ALJ Ruling, provide supporting documentation demonstrating whether the activity includes costs associated with the Expanded Clearance Program.

If an Activity includes costs associated with the Expanded Clearance Program, provide the portion of the \$2.948 million in Expanded Clearance Program costs attributed to each Tree Trimming Activity listed.

- h. Explain whether costs associated with outsourced crews are included in any of the Tree Trimming Activities listed on the table on p. 5 of SDG&E’s response to the ALJ Ruling.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 3, 5, 6, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 2:

- a. Please see corresponding file titled, “PubAdv_SDG&E_008_RYD_Q1_Response.xlsx.”

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- b. All of the Tree Trimming activities on p. 5 of SDG&E's response to the ALJ Ruling are rolled into the costs under the line item titled Tree Trimming in SDG&E's spreadsheet titled "2019 TTBA O&M by categoryDR1Q1.xlsx."

SDG&E notes that, because it does not track TTBA expenditures by activity level, such as those activities requested by and provided for in response to the Administrative Law Judge's Email Ruling Directing SDG&E to Provide Additional Information (ALJ Ruling), SDG&E had to use its best efforts to reconstruct TTBA total costs and to separate and assign costs to the requested categories.² To that end, SDG&E used different cost tracking mechanisms, such as fixed rate pricing "Activity Codes, to identify and assign costs to the categories requested in the ALJ Ruling. These tracking mechanisms may include additional items that are not directly tracked to the TTBA for regulatory accounting purposes, such as certain loaders.³ Thus, the total spend in the corresponding file "PubAdv_SDG&E_008_RYD_Q1_Response.xlsx" does not directly align with the total 2019 TTBA spend for tree trimming activities. While these loaders and other variables may not directly align with the total TTBA spend, the breakdown of costs by activity provided in the ALJ Ruling reflect the increases in spend by activity as described in the testimony of Michael Daleo in support of SDG&E's Application.

- c. SDG&E used the data points and sources available at the time for its response to Cal Advocates' data requests. SDG&E's spreadsheet "2019 TTBA O&M by category DR1Q1" includes all expenses tracked to the TTBA by category for regulatory accounting purposes. The expenses were provided in the way that SDG&E tracks TTBA expenditures, including those categorized as "tree trimming." SDG&E does not track tree trimming expenditures by the sub-categories identified in the ALJ Ruling. As such, identifying TTBA expenditures by the categories requested by Cal Advocates in PubAdv-SDG&E-005-RYD, Q. 2 would have required re-creating and reclassifying all tree trimming costs by assigned category—an unduly burdensome process.

In its response to the ALJ Ruling SDG&E used its best efforts to recategorize SDG&E's tree-trimming expenditures as requested by the Administrative Law Judge. To do so, SDG&E utilized multiple accounting sources to identify and quantify the specific activities under the broad Tree Trimming category. As previously noted, while the spend noted in "PubAdv_SDG&E_008_RYD_Q1_Response.xlsx" may not directly align with the costs recorded in "2019 TTBA O&M by category DR1Q1," it does reflect the increases in TTBA spend by activity as described in the testimony of Michael Daleo in support of SDG&E's Application.

² See SDG&E Response to the ALJ Ruling at Q3(a).

³ Because these other costs are not tracked to the TTBA, they may be reviewed and recovered through different mechanisms. But they are not a subject of this application and are not included in the costs sought to be recovered by SDG&E's Application to recover the 2019 TTBA undercollection.

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- d. Please see the corresponding file “PubAdv_SDG&E_008_RYD_Q1_Response.xlsx” in the tab titled, TREE ACTIVITY SPEND wherein the specific cost related to hazard trims performed at unit cost rates is provided at line 189. The work related to hazard trims at unit cost rates is denoted using a unique and specific activity code. This code is different than the activity codes used for all other activities. SDG&E is unable to identify any hazard tree work performed at T&E rates due to its current invoicing and tracking processes. As such, all hazard tree work billed at T&E rates is included in the “T&E” row in response to Question 3(a) of the ALJ Ruling.
 - e. SDG&E’s costs related to “Hazard tree” as shown in response to Question 3 of the ALJ Ruling reflects the costs of hazard tree trimming performed at unit cost rates. As previously noted, any hazard tree work (trims or removals) billed at T&E rates is included in the “T&E” of SDG&E’s response to Question 3 of the ALJ Ruling. Costs associated with hazard tree removals are included in the “Removals” rows of SDG&E’s response to the ALJ Ruling.
 - f. Please see the response to Question 2(e) and the corresponding file “PubAdv_SDG&E_008_RYD_Q1_Response.xlsx”. The costs identified as “Hazard Tree” in response to Question 3 of the ALJ Ruling reflect the costs associated with hazard tree trims performed at unit cost rates. These costs are not associated with any other category identified in the table, however, other costs in the table, such as T&E or removal costs, may be associated with mitigation of hazard trees.
 - g. The Tree Trimming Activity costs associated with the Enhanced Clearance Program are contained within Routine Trimming, Field Memo, Hazard Tree, Pre-inspection, Auditing, and T&E. The costs related to the Program are included within each activity’s total cost reflected in the table on p. 5 of SDG&E’s response to the ALJ Ruling. SDG&E does not specifically track and record these associated costs within each activity, however, SDG&E’s response in “PubAdv-DR-003-RYD Q1-3 Final” provides additional detail regarding SDG&E’s estimate of costs associated with the Enhanced Clearance Program.
 - h. Costs associated with outsourced crews are included in the T&E activity. This includes cost for trimming and removal of trees at T&E rates, as well as hotel/lodging, meals, and per-diem.

QUESTION 3:

Referring to SDG&E’s response to data request PubAdv-SDG&E-001-RYD, Q. 3, SDG&E shows that the number of hazard trees removed in 2019 increased by only 18 trees from 2018. SDG&E states that the average cost per tree removal was \$666.45 in 2018 and \$810.59 in 2019. These figures represent a total cost of \$312,226.95 in 2018 and \$412,590.31 in 2019, a \$85,363.36 increase.

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Referring to SDG&E's Response to the Administrative Law Judge's Email Ruling Directing SDG&E to Provide Additional Information, Q. 3b, on the first table provided on p. 6, SDG&E shows that "Hazard Tree" increased by 57%, or \$2,550,286.74, from the 4-year average. The table shows that "Removals" increased by 32%, or \$643,334.33, from the 4-year average.

Please answer the following:

- a. Explain specifically how 2019 "Hazard Tree" costs increased by \$2.55 million from the 4-year average while the cost of 2019 Hazard Tree Removals increased by only \$0.085 million from 2018.
- b. Explain specifically how 2019 "Removals" costs increased by \$0.643 million from the 4-year average while the cost of 2019 Hazard Tree Removals increased by only \$0.085 million from 2018.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 6, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 3:

- a. The "Hazard Tree" activity noted in SDG&E's response to the ALJ Ruling includes costs associated with the **trimming** of hazard trees at unit cost rates. Due to the method by which SDG&E tracks costs, this method represented the best possible method of consistently identifying costs associated specifically with hazard tree trimming. The cost of hazard tree trimming increased substantially in 2019 versus the 4-year average because of the increase in units and contractual rate increases. As SDG&E noted in response to PUBADV-SDG&E-DR-001, Question 8, SDG&E trimmed approximately 6,500 more hazard trees in 2019 than in 2018, a nearly 50% increase over 2018.

The cost of Hazard Tree Removals at unit cost rates is recorded independent of costs associated with unit cost hazard trimming. The Removals activity provided in the table on p. 6 of SDG&E's response to the ALJ Ruling includes costs associated with both routine removals and Hazard Tree Removals.

Additionally, hazard tree trims and removals that were completed under the T&E cost structure are included in the T&E activity in the table on p. 6 of SDG&E's response to the ALJ Ruling. As previously noted, SDG&E is unable to track or identify T&E costs by activity.

- b. The Removals activity in SDG&E's response to the ALJ Ruling includes the costs of all removals performed at unit cost rates and is not limited to only hazard tree removals. The

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increase in the costs associated with the “Removals” activity reflects the increase in both hazard tree removals as well as overall tree removal activity at unit cost rates, in addition to contractual rate increases. As shown in SDG&E’s response to PUBADV-SDG&E-DR-001-RYD, Question 8 (October 2, 2020 Supplement), SDG&E removed approximately 900 more trees in 2019 than 2018.

QUESTION 4:

Referring to SDG&E’s Response to the Administrative Law Judge’s Email Ruling Directing SDG&E to Provide Additional Information, Q. 3b, in the first table on p. 6, SDG&E shows that it recorded \$1,811,281 for “Auditing” in the TTBA in 2019.

Referring to SDG&E’s response to data request PubAdv-SDG&E-005-RYD, Q. 2c, auditing and inspections represented \$197,607 of 2019 TTBA costs.

Explain the discrepancy in SDG&E’s data request responses and the information SDG&E provided in response to the ALJ Ruling.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 6, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 4:

The cost provided in the Auditing activity in response to the ALJ Ruling represents the total cost of all auditing services in 2019. As noted in SDG&E’s response to data request PubAdv-SDG&E-005-RYD, Q. 2c, the \$197,607 reflected in the table represents costs associated with “enhanced audits/inspections” performed in accordance with SDG&E’s wildfire mitigation plan. These enhanced activity costs are associated with the off-cycle tree inspections in the High Fire Threat District performed in conjunction with the routine post-trim audit activity. This cost for the enhanced off-cycle activity is included within the total cost of the audit activity in the response to the ALJ Ruling.

QUESTION 5:

Referring to SDG&E’s Response to the Administrative Law Judge’s Email Ruling Directing SDG&E to Provide Additional Information, Q. 3b, in the first table on p. 6, SDG&E shows that it recorded \$276,600 for “Refusals” in the TTBA in 2019.

Referring to SDG&E’s response to data request PubAdv-SDG&E-005-RYD, Q. 2c, Customer Refusals represented \$247,800 of 2019 TTBA costs.

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Explain the discrepancy in SDG&E's data request responses and the information SDG&E provided in response to the ALJ Ruling.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, and 6. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 5:

In calculating its response to data request PubAdv-SDG&E-005-RYD, Q. 2c, SDG&E inadvertently used the count of 2018 customer refusals, rather than the 2019 refusal count. In its response to data request PubAdv-SDG&E-004-RYD, Q. 6c SDG&E estimated the cost of refusals in 2019 to be \$276,500. Table 2-4 of Mr. Andresen's Report on behalf of Cal Advocates also includes the more accurate estimated cost of refusals as \$276,500. SDG&E notes that, as previously discussed, it does not specifically track the costs associated with customer refusals, and thus any amount provided by SDG&E represents an estimate.

QUESTION 6:

Referring to SDG&E's Response to the Administrative Law Judge's Email Ruling Directing SDG&E to Provide Additional Information, Q. 3b, in the first table on p. 6, SDG&E shows that it recorded \$10,432,745.57 for "Routine Trimming" in the TTBA in 2019.

Referring to SDG&E's response to data request PubAdv-SDG&E-006-RYD, Q. 4c, Routine Trimming represented \$11,102,047 of 2019 TTBA costs, an increase of 6% from 2018.

Explain the discrepancy in SDG&E's data request responses and the information SDG&E provided in response to the ALJ Ruling.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2 and 6. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 6:

As requested by the ALJ Ruling, SDG&E's response to Question 3b separated the costs for Routine Trimming and Field Memos. Field memos include prioritized tree trimming activities. SDG&E's response to data request PubAdv-SDG&E-006-RYD, Q. 4c included the cost of Field Memos in the Routine Trimming category.

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As previously stated, SDG&E notes that because it does not track TTBA expenditures by activity level, including those activities requested by and provided for in response to the Administrative Law Judge’s Email Ruling Directing SDG&E to Provide Additional Information (ALJ Ruling), SDG&E had to use its best efforts to reconstruct TTBA total costs and to separate and assign costs to the requested categories.⁴ To that end, SDG&E used different cost tracking mechanisms, such as fixed rate pricing , to identify and assign costs to the categories requested in the ALJ Ruling. These tracking mechanisms may include additional items that are not directly tracked to the TTBA for regulatory accounting purposes, such as certain loaders. Thus, the spend identified in the tables identified in the ALJ Ruling may not directly align with the total 2019 TTBA spend for tree trimming activities. While these loaders and other variables may not exactly align with the total TTBA spend, the breakdown of costs by activity provided in the ALJ Ruling reflect the increases in spend by activity as described in the testimony of Michael Daleo in support of SDG&E’s TTBA Application.

QUESTION 7:

Referring to SDG&E’s Response to the Administrative Law Judge’s Email Ruling Directing SDG&E to Provide Additional Information, Q. 3b, in the first table on p. 6, SDG&E shows that it recorded \$4,747,525 in 2019 for “Pre-inspection” in the TTBA in 2019.

Referring to SDG&E’s response to data request PubAdv-SDG&E-005-RYD, Q. 5b, Pre-inspections represented \$5,243,699 of 2019 TTBA costs.

Explain the discrepancy in SDG&E’s data request responses and the information SDG&E provided in response to the ALJ Ruling.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 6, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 7:

The amount SDG&E provided in response to data request PubAdv-SDG&E-005-RYD, Q. 5b, where Pre-inspections represented \$5,243,699 of TTBA 2019 costs did not separate out the costs for the non-TTBA pre-inspection activities related to pole brushing and transmission.⁵ In response to PubAdv-SDG&E-005-RYD, in the excel file, “2019 TTBA O&M_Category_Detail_DR5_FollowUp,” SDG&E provides the total TTBA pre-inspection costs of \$4,747,525 (see line 82).

⁴ See SDG&E Response to the ALJ Ruling at Q3(a).

⁵ SDG&E tracks pole brushing and transmission related costs in separate accounts and is not seeking recovery of those costs through this application. SDG&E is seeking recovery of the \$4,747,525 associated with the TTBA in the instant application.