

THE UTILITY REFORM NETWORK DATA REQUEST
TURN-DR-009
SDG&E/SOCALGAS 2021 RAMP REPORTS- A.21-05-011/014
DATE RECEIVED: AUGUST 13, 2021
DATE RESPONDED: AUGUST 20, 2021

Question 1:

It was mentioned at today's workshop that SDG&E has a more complete WINGS model that assesses all of SDG&E's overhead HFTD miles (around 3,500 miles I believe). Can SDG&E please provide this in Excel with all data and calculations in separate columns as in the response to TURN-5?

SDG&E Response 01:

SDG&E objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is overbroad and 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 further objects to this request on the grounds that it is beyond the scope of the issues to be addressed in the pending RAMP proceeding. SDG&E further objects to this request on the grounds that it seeks the production of confidential, proprietary business information as it pertains to the WiNGS model. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

SDG&E uses the WiNGS model for various applications, one of which is performing analytics to evaluate RAMP-related mitigations. SDG&E's mention during the August 13, 2021 workshop of using WiNGS to model approximately 3,500 miles of overhead conductor was made in a holistic context of using the WiNGS model, i.e., not all the analytics associated with those 3,500 miles falls within the scope of SDG&E's 2021 RAMP. The subset of the WiNGS modeling that is applicable to the 2021 RAMP was provided in the excel spreadsheet titled "2021 RAMP WiNGS Workpaper 7_7_2021 – Table_145" in response to TURN DR#5 Question 1, which has been subsequently updated in TURN DR#6 in excel spreadsheet "TURN DR6 Excel Responses_162.xlsx."