

**WILDFIRE SAFETY DIVISION DATA REQUEST
SAFETY CULTURE ASSESSMENTS
SDG&E RESPONSE**

Date Received: August 20, 2020

Date Submitted: August 26, 2020

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:

Provide the following documents:

- A copy of your bi-annual employee survey
- A copy of the National Safety Council survey conducted by SDG&E
- A copy of the most recent briefing materials shared with the Executive Safety Council in which results of the NSC safety culture survey and the plan were shared.

For each survey listed above, provide the following:

- Questions or elements which pertain most to safety in general
- Questions or elements which pertain most to wildfire safety
- Summary of most recent results
- The date the last survey was administered
- The date that the next survey is planned to be administered

OBJECTION:

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

RESPONSE 1:

Please see the attached documents:

- SDGE-Barometer-Questions_Summary.xlsx
- SDGE-Results-Report_2018 Safety Barometer.pdf
- SDGE-SB-Results-2018_Exec-Summary.pdf

Within these documents, there are 47 of 58 questions/elements that pertain most to safety. While these 47 questions/elements address safety in general, which includes wildfire safety, no questions/elements are specific to wildfire. The executive summary document provided summarizes the most recent results.

The last survey was administered in August-September 2018 (it is not a single date, rather the survey is available to be taken over a three-week period). SDG&E anticipates administering the next safety survey in October-November 2020.