**BEFORE THE PUBLIC UTILITIES COMMISSION**

**OF THE STATE OF CALIFORNIA**

|  |  |
| --- | --- |
| Joint Application of Southern California Edison Company (U338E) and San Diego Gas & Electric Company (U902E) to find the 2014 SONGS Units 2 and 3 Decommissioning Cost Estimate Reasonable and Address Other Related Decommissioning Issues. | Application 14-12-007  (Filed December 10, 2014) |

**DONNA GILMORE'S FIRST SET OF DATA REQUESTS TO SAN DIEGO GAS & ELECTRIC CO.**

**(A1412007 - GILMORE-SDG&E 001)**

To: EMMA SALUSTRO, Attorney for SDG&E, 101 Ash St. – HQ-12B, P.O. Box 1831,

San Diego, CA 92101-3017, ESalustro@SempraUtilities.com

From: David Peffer, Attorney for Donna Gilmore, 3412 Herman Ave. - Unit B, San Diego, CA

David.A.Peffer@gmail.com

Dorah Shuey, Advocate for Donna Gilmore, P.O. Box 162 Davenport, CA 95017

(831) 427-0624, dorahbee@comcast.net

Jean Merrigan, Advocate for Donna Gilmore, P.O. Box 2615, Martinez, CA 94553

(925) 957-6070, jnmwem@gmail.com

Date: May 18, 2015

Subject: DONNA GILMORE'S FIRST SET OF DATA REQUESTS TO SAN DIEGO GAS & ELECTRIC CO. (A1412007 - GILMORE-SDG&E 001)

DONNA GILMORE requests that San Diego Gas & Electric Company provide the information and produce and serve upon her the documents requested below no later than June 1, 2015. Please note General Instructions & Definitions, listed below the data request.

Please deliver responses by e-mail to:

Donna Gilmore,dgilmore@cox.net

Jean Merrigan, jnmwem@gmail.com

David Peffer, david.a.peffer@gmail.com  
Dorah Shuey, dorahbee@comcast.net

A1412007- Gilmore-SDGE 001 – Re: Data Requests

Question 1:

Please provide copies of all materials that SDG&E has provided in response to other parties’ data requests in A.14-12-007.  For purposes of this data request, consider the CPUC’s energy division a party.  Please consider this an ongoing data request and provide additional materials as SDG&E responds to other parties’ additional data requests.

INSTRUCTIONS AND DEFINITIONS:

1. Each Request is intended to elicit discovery of all documents, tangible things, and

knowledge or information of the IOUs, theirs employees and agents, and any person acting on

their behalf.

2. Please notify David Peffer, Attorney for DONNA GILMORE, and Jean Merrigan and Dorah Shuey, Advocates for DONNA GILMORE, within 5 days of receiving this request, if the respondent will not be providing a substantive answer to a particular question.

3. In responding to each Request, please state the text of the request prior to providing

the response, and provide the name of the person or persons answering, the title of such

person(s), the person they work for, and the name of the witness or witnesses who will be

prepared to testify concerning the matters contained in each response or document produced.

4. Each information or production request is continuing in nature. Thus, if the respondent

acquires additional information after any request has been answered initially, it should

supplement their response following the receipt of such additional information, giving the

information to the same extent as originally requested. If the IOUs are unwilling to supplement

its responses, please state in the form of an objection so that DONNA GILMORE may have the

opportunity to seek updated information again at a later date.

5. The terms “document” or “documents” include, but are not limited to, the following

items, whether printed, recorded, or written or reproduced by hand: reports, studies,

statistics, decisions and orders, intra-office and interoffice communications, correspondence,

memoranda, summaries or records of conversations or interviews, diaries, calendars, work

papers, notes, summaries or records of meetings, summaries or reports of investigations,

opinions or reports of consultants, and other documents or tangible things of whatever

description which constitute or contain information within the scope of a Request to produce.

6. Request the following basic tools for navigation and review of all documents: For all

documents provided in response to this request, as well as testimony submitted to date and in

the future, DONNA GILMORE asks that SDG&E provide the following minimum aids for navigation

and review:

• Searchable text (not scanned)

• Table of contents and/or index

• Consecutive page numbering throughout the document

• Spreadsheets in excel format

• Consolidated tables (instead of or in addition to tables dotted throughout the

document)

• Disaggregated data (instead of dissimilar items being lumped together)

• A form of pdf that allows for review & markup – e.g. highlighting & comment balloons