

**A4NR DATA REQUEST
A4NR-SDG&E-DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: FEBRUARY 19, 2013
DATE RESPONDED: MARCH 14, 2013**

If any of the requested information is withheld or redacted, please provide the specific legal justification for such withholding or redaction.

QUESTION 1: Please provide copies of any portions of minutes of San Onofre Board of Review meetings, held since January 1, 2001 and relating to replacement steam generators, which SDG&E believes were inappropriately redacted from SCE's response to A4NR Question 7 to SCE.

SDG&E Response:

SDG&E has reviewed SCE's redactions of BOR meeting minutes provided to A4NR in SCE Data Response A4NR-SCE-001 Question 7 and identified some material which was redacted in error. SCE agrees, and SCE will be providing corrected versions of the BOR minutes to A4NR. SDG&E agrees with the remainder of redactions as originally provided.

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QUESTION 2: Please provide copies of all documents and electronically stored information relating to SDG&E's request for the Huron and Goodnight consulting findings mentioned on p. 2 of the minutes of the January 29, 2009 meeting of the San Onofre Board of Review.

SDG&E Response:

SDG&E objects to this data request on grounds that seeks information (a) protected by the attorney-client privilege or attorney work-product doctrine or (b) that is beyond the scope of the OII both in terms of subject matter (SONGS staffing levels) and time (2008 and 2009).

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QUESTION 3: Please provide copies of all documents and electronically stored information relating to SDG&E's reaction to any INPO reports since January 1, 2001 relating to the SONGS steam generators.

SDG&E Response:

SDG&E objects to the request as unduly burdensome, overbroad, and is outside the scope of this proceeding and beyond the jurisdiction of the California Public Utilities Commission as it seems to be raising issues involving the nuclear safety of SONGS. Moreover, SDG&E objects to the extent the request seeks information protected by the attorney-client or attorney work-product doctrine.

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QUESTION 4: Please provide copies of all documents and electronically stored information relating to SDG&E's reaction to any EPRI reports since January 1, 2001 relating to the SONGS steam generators.

SDG&E Response:

SDG&E was unable to find documents and electronically stored information relating to SDG&E's reaction to any EPRI reports since January 1, 2001 relating to the SONGS steam generators.

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QUESTION 5: Please provide copies of the portions of minutes of all meetings of the Sempra Board of Directors since January 1, 2001 which relate to the subject of the SONGS steam generators.

SDG&E Response:

SDG&E responds with the attached redacted Sempra Board of Directors meeting minutes involving information relating to the subject of the SONGS steam generators.

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QUESTION 6: Please provide copies of the portions of minutes of all meetings of the SDG&E Board of Directors since January 1, 2001 which relate to the subject of the SONGS steam generators.

SDG&E Response:

SDG&E responds with the attached redacted SDG&E Board of Directors meeting minutes involving information relating to the subject of the SONGS steam generators.

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QUESTION 7: Please provide copies of all documents and electronically stored information relating to the Sargent & Lundy “independent assessment of Steam Generator Replacement quantitative and qualitative results” described on p. 1 of the minutes of the July 21, 2003 special meeting of the San Onofre Board of Review.

SDG&E Response:

SDG&E objects to this data request on grounds that it seeks information (a) protected by the attorney-client privilege or attorney work-product doctrine or (b) that is beyond the scope of the OII (timing of need for steam generator replacement). SDG&E raised this timing issue during the pendency of SCE’s A.04-02-026. The CPUC rejected SDG&E’s position in D.05-12-040 by adopting SCE’s proposal and timing for the replacement of the steam generators. Thus, the timing of need for SG replacement is not at issue in the OII.

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QUESTION 8: Please provide copies of all documents and electronically stored information relating to the decision by SDG&E to not support steam generator replacement reported on p. 1 of the minutes of the July 21, 2003 special meeting of the San Onofre Board of Review.

SDG&E Response:

SDG&E objects to this data request on grounds that it is overbroad and unduly burdensome. SDG&E also objects to the extent (a) it seeks information protected by the attorney-client privilege or attorney work-product doctrine or (b) that is beyond the scope of the OII (SDG&E's decision to not support steam generator replacement was the subject of SDG&E's involvement in SCE's A.04-02-026, although the CPUC in D.05-12-040 rejected SDG&E's position by adopting SCE's proposal and timing for the replacement of the steam generators). Thus, SDG&E's original decision to not support steam generator replacement is not at issue in the OII. Please see SDG&E's Response to Data Request Q.11.

Subject to and without waiving these objections, SDG&E provides as follows:

- SONGS Steam Generator Replacement Decision Analysis, dated June 3, 2003.

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QUESTION 9: Please provide copies of all documents and electronically stored information relating to SDG&E's disapproval of "the 2004 Capital and Operation and Maintenance budgets that SCE presented to the BOR on January 23, 2004," as reported on p. 5 of the minutes of the May 13, 2004 meeting of the San Onofre Board of Review.

SDG&E Response:

SDG&E objects to this data request on grounds that it is overbroad and unduly burdensome. SDG&E also objects to the extent (a) it seeks information protected by the attorney-client privilege or attorney work-product doctrine or (b) that is beyond the scope of the OII (SDG&E's disapproval of the 2004 Capital and Operation and Maintenance budgets is not at issue in the OII). Please see SDG&E's Response to Data Request Q.11.

Subject to and without waiving these objections, SDG&E provides as follows:

- An email, dated August 11, 2004, from SDG&E's Michael Olsen to SCE's Dawn Farrell pertaining to SDG&E's disapproval of the subject budgets;
- An email, dated August 17, 2004, from SCE's Dawn Farrell to SDG&E's Michael Olson pertaining to SDG&E's disapproval of the subject budgets;
- Redacted December 11, 2003 meeting minutes of the SONGS Engineering, Operations, and Budget Committee (EOB) meeting pertaining to SDG&E's disapproval of the subject budgets;
- Redacted SONGS E&O Committee Operations Report, dated December 11, 2003, pertaining to Key Performance Indicators and Budget Update pertaining to the steam generator replacement and Capital Forecast pertaining thereto;
- SDG&E Michael Olson's redacted handwritten notes, dated December 11, 2003, pertaining to the December 11, 2003 EOB meeting;
- SONGS Units 2 & 3 Pre-BOR Update, dated January 22, 2004;
- Letter dated January 30, 2004 SDG&E's Statement of Position;
- Statement Submitted by City of Anaheim;
- SDG&E Notice of Demand for Arbitration Letter, dated April 14, 2004;
- SCE Response to Demand for Arbitration Letter, dated April 23, 2004;
- SDG&E Letter, dated April 29, 2004 regarding selecting an arbitrator;
- Redacted BOR Meeting Presentation – Proposed 2004 Capital Budget for Approval and Five Year Capital Forecast, dated May 13, 2004;
- Letter dated May, 24, 2004 withdrawing the 2004 budgets presented at May 13, 2004 BOR meeting and attaching updated Proposed 2004 Capital Budget for Approval and Five Year Capital Forecast, dated May 13, 2004, excluding SGRP costs.

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QUESTION 10: Please provide copies of all documents and electronically stored information relating to SDG&E's disapproval of "the revised 2004 Capital and Operating Budgets that SCE has presented to the BOR today," as reported on p. 5 of the minutes of the May 13, 2004 meeting of the San Onofre Board of Review.

SDG&E Response:

SDG&E objects to this data request on grounds that it is overbroad and unduly burdensome. SDG&E also objects to the extent that (a) it seeks information protected by the attorney-client privilege or attorney work-product doctrine or (b) is beyond the scope of the OIL.

Subject to and without waiving these objections, please see SDG&E's response to Data Requests Q.9 and Q.11.

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QUESTION 11: Please provide copies of all documents and electronically stored information relating to SDG&E's determination that SCE should "declare an Operating Impairment exists under the terms of the Operating Agreement," as reported on p. 5 of the minutes of the May 13, 2004 meeting of the San Onofre Board of Review.

SDG&E Response:

SDG&E objects to this data request on grounds that it is overbroad and unduly burdensome. SDG&E also objects to the extent it seeks information (a) protected by the attorney-client privilege or attorney work-product doctrine or (b) that is beyond the scope of the OII (SCE declared an Operating Impairment relative to the original steam generators). SDG&E raised this timing issue during the pendency of SCE's A.04-02-026 although the CPUC in D.05-12-040 rejected SDG&E's position by adopting SCE's proposal and timing for the replacement of the steam generators. Thus, the timing of need for SG replacement is not at issue in the OII.

Subject to and without waiving these objections, SDG&E provides as follows:

- Redacted SDG&E Michael Olson's handwritten notes pertaining to the January 23, 2004 Board of Review meeting pertaining to the Operating Impairment matter;
- An undated memo prepared after SCE filed its Application No. 04-02-026, dated February 27, 2004 ("Underlying Dispute Issues");
- February 24, 2004 Letter from SDG&E's Jim Avery to BOR members requesting a special meeting to consider SGRP;
- February 26, 2004 Letter from SCE's Harold Ray to BOR members responding to SDG&E's February 24, 2004 letter;
- March 29, 2004 Letter from SCE's Harold Ray to BOR members (SONGS Plant Output Reductions due to Steam Generator Degradation);
- March 10, 2004 email from SDG&E's Michael Olson to Richard Schaffer and James Walsh involving an SCE submission to the SEC concerning SONGS steam generators;
- Redacted SONGS Units 2 & 3 Pre-BOR Update, dated May 14, 2003;
- SCE BOR presentation paper titled Need for and Timing of Steam Generator Replacement, dated May 16, 2003;
- SDG&E's Verified Complaint for Declaratory Relief, April 14, 2004;
- SDG&E's First Amended Verified Complaint, April 29, 2004;
- SDG&E's Request for Dismissal, June 15, 2004;
- SCE's June 22, 2004 letter declaring an Operating Impairment involving the steam generators;
- SDG&E's July 13, 2004 letter re Notice of SDG&E's Election Not to Participate in Restoration Work and Election of Demand for Arbitration;

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Response to Question 11 (Continued)

- SCE's Motion For An Order To Show Cause Why SDG&E Should Not Participate In The Steam Generator Replacement, April 23, 2004;
- SDG&E's Response to SCE's Motion For An Order To Show Cause Why SDG&E Should Not Participate In The Steam Generator Replacement, May 10, 2004;
- SCE's Reply to SDG&E's Response to SCE's Motion, May 17, 2004
A.04-02-026 First Hearing day transcript excerpts dated January 31, 2005. See pages 6 through 18 pertaining to the subject of SCE's Motion;
- Mike Olsen Handwritten Notes regarding RFPs for Sale and Replacement of SONGS, dated July 20, 2004;
- July 19, 2004 Meeting Notes Regarding SONGS Replacement RFP;
- SGR Regulatory Response prepared September 23, 2003;
- Comparison of SCE's Cost for SONGS 2 & 3 Steam Generator Replacement Under "Operating Impairment" (undated);
- Email dated August 24, 2004 regarding 2003 O&M Expenses Associated with SGRP;
- Incremental Cost of Not Reducing Common Plan Ownership when Unit 2/3 ownership is reduced;
- SCE's Cost of Capacity Increase under Operating Impairment;
- Scenario 1: Operating Impairment;
- Email dated September 8, 2004 re Outside Legal Assistance re SGRP;
- Letter dated October 14, 2004 from City of Riverside re participation in restoration work related to SONGS SGR;
- Draft Talking Points for 9/10/04 Meeting with CPUC President Peevey;
- Letter to CPUC ALJ O'Donnell from SCE stating contractual dispute has been resolved, dated June 25, 2004;
- Summary of SONGS Operating Agreement Section 16 "Operating Impairment" as it Pertains to Steam Generator Replacement, dated June 1, 2004;
- Operating Agreement Excerpts Relevant to Operating Impairment;
- Operating Agreement Definitions Relevant to Operating Impairment;
- For SDG&E's testimony and briefs/comments filed in A.04-02-026, please see SDG&E's responses to Henricks Data Request, HENRICKS-SDG&E-DR-02, at the link:
<http://www.sdge.com/regulatory-filing/4011/songs-investigation>.