

**DRA DATA REQUEST  
DRA-SDG&E-DR-002  
SDG&E 2012 COST OF CAPITAL – A.12-04-016  
SDG&E RESPONSE  
DATE RECEIVED: MAY 10, 2012  
DATE RESPONDED: MAY 24, 2012**

1. Please provide copies of the Company's application and chapters/testimonies for all witnesses in Microsoft Word.

**SDG&E Response:**

Please see the CD provided with this response.

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2. For all tables, exhibits, data appendices, charts, figures, and schedules in the Company's application and the testimonies/chapters of all witnesses, please provide copies of the associated data, the data sources, work papers, source documents, and calculations in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.

**SDG&E Response:**

Please refer to SDG&E's response to Question 3, below.

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3. Please provide: (1) copies of all source documents, articles, pages from books, investment reports, credit rating agency reports, regulatory decisions, work papers, and other sources used in the development and preparation of the application and each testimony/chapter; and (2) an index with testimony/chapter page number, the document that is being provided, the file name of the provided document, and page or tab numbers associated with the materials provided in (1).

**SDG&E Response:**

SDG&E objects to this question to the extent it requests copies of all Commission regulatory decisions and other filed Commission documents used in the development and preparation of the application and testimony on the grounds that these documents are publicly available to DRA. SDG&E relied on all relevant law and precedent in the development and preparation of its application, including, but not limited to, the regulatory decisions cited therein. SDG&E will provide all legal arguments and citations in briefs.

SDG&E also objects to this question to the extent it requests documents and information that are copyrighted and proprietary in nature. Website citations have been provided for copyrighted information that is available online. Cited reference materials that are not within SDG&E's control and possession have not been provided.

Credit rating agency reports are copyrighted materials available to paid subscribers and copies therefore cannot be provided to third parties, except in some instances by permission. SDG&E is willing to make the credit reports from the major credit rating agencies published since January 1, 2010 available at its offices for visual examination by requesting third parties to this proceeding.

**SDG&E Response 3(1):**

The responsive documents have been provided in an accompanying CD. The material related to witness Don Widjaja contains a revised Attachment C which corrects data entry error in one row. Both the original and revised spreadsheets are provided. The correction has no material impact on the analysis.

SDG&E submitted workpapers (Excel format) supporting the testimony of witness Sandra Hrna to DRA via overnight Federal Express on April 20, 2012. The workpapers are responsive to this request.

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**Response to Question 3 (Continued)**

**SDG&E Response 3(2):**

Schlax



Testimony Citations  
and References\_Schl

Deremer



Testimony citations  
and references\_Dere

Widjaja



Testimony Citations  
and References\_Widj

Hrna



Testimony Citations  
and References\_Hrna

Morin



Testimony citations  
and references\_Morir